National Park Service
U.S. Department of the Interior
Ala Kahakai National Historic Trail

Ala Kahakai
National Historic Trail

Abbreviated Final Comprehensive Management Plan & Environmental Impact Statement

October 2008

Photo Credits

Front cover: Top: Pu‘u Kohola Heiau; bottom left: Trail to Luahinewai, Kīholo, North Kona; bottom center: Manini‘owali, N. Kona; bottom right: Ka‘awaloa, S. Kona; NPS photos.

Back cover: Top left: Ka‘awaloa Road, S. Kona; center left: Petroglyphs, Anaehoomalu, bottom left: jeep trail, N. Kohala; right: Mamalahoa trail. NPS photos.

ABBREVIATED FINAL ENVIRONMENTAL IMPACT STATEMENT
and
Comprehensive Management Plan
For the

Ala Kahakai National Historic Trail

Pacific West Region

National Park Service

United States Department of the Interior

October 2008

1800 Lava Flow, Kalae Mano, N. Kona, NPS photo

Abbreviated Final Environmental Impact Statement
& Comprehensive Management Plan
(These pages replace pages iii-iv of the Draft CMP/EIS)

Ala Kahakai National Historic Trail

U.S. Department of the Interior ■ National Park Service

October 2008

The Ala Kahakai[1] National Historic Trail (NHT) was added to the National Trails System on November 13, 2000. The legislation authorizing the trail identifies an approximately 175-mile portion of prehistoric *ala loa* (long trail) on or parallel to the seacoast extending from ʻUpolu Point on the north tip of Hawaiʻi Island down the west coast of the island around Ka Lae (South Point) to the east boundary of Hawaiʻi Volcanoes National Park. As authorized by Congress, the Ala Kahakai NHT, combines surviving elements of the ancient and historic coastal *ala loa* with segments of later *alanui aupuni* (government trails), that developed on top of or parallel to the traditional trails, and more recent pathways and roads that create links between the historic segments. To comply with the National Trails System Act (16USC 1241-1251), the National Park Service (NPS) is required to prepare a comprehensive management plan for the trail that will outline how the national trail would be administered and managed for approximately 15 years.

Because changes to the draft document were minor and confined primarily to factual corrections which do not modify the analysis, an abbreviated format has been selected. Use of this format complies with the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (40 CFR 1503.4[c]). The abbreviated format requires that the material in this document be integrated with the draft CMP/EIS to describe the final plan, significant environmental impacts, and public comments that have been received and evaluated. Additional copies of the draft are available upon request.

This document is the final comprehensive management plan and environmental impact statement (CMP/EIS) for the Ala Kahakai NHT. The plan is intended to be a useful long-term decision-making tool, providing NPS administrators with a logical and trackable rationale for decisions about the protection and public use of the national historic trail. The CMP examines three possible management strategies, called "alternatives," and the impact on the national trail resources of implementing these alternatives. These alternatives respond to the National Trails System Act, NPS planning requirements, and the issues identified during public scoping. One of these alternatives, Alternative C: Ahupuaʻa Trail System, constitutes the Proposed Action and the Preferred Alternative by the NPS.

Alternative C, the environmentally preferred alternative, is based on the traditional Hawaiian trail system in which multiple trail alignments within the *ahupuaʻa* (mountain to sea land division) are integral to land use and stewardship. Under the proposed action, a continuous trail parallel to the shoreline would be protected; however, on public lands and where landowners wish it, the Ala Kahakai NHT could include inland portions of the *ala loa* or other historic trails that run lateral to the shoreline, and the shoreline *ala loa* would be connected to ancient or historic *mauka-makai* (mountain to sea) trails that would have traditionally been part of the *ahupuaʻa* system. During the 15-year planning period, the priority zone from Kawaihae through Puʻuhonua o Hōnaunau National Park to Hoʻokena would be the focus for developing a continuous publicly accessible trail, but trail administration and management would protect and preserve trail sections outside of that zone as feasible.

Through an agreement, the state of Hawaii could convey to the NPS a less-than-fee management interest in trail segments that are state-owned under the Highways Act of 1892 within the Ala Kahakai NHT corridor. The NPS would then be responsible for managing these segments and federal law would fully apply. However, in cooperation with the NPS, local communities of the *ahupuaʻa* would be encouraged to take responsibility

[1] A term coined by a planner in 1973 from *ala* (path, trail) *kaha* (by the) *kai* (sea). *Kahakai* means beach, seashore.

for trail management using the traditional Hawaiian principles of land management and stewardship. The Ala Kahakai Trail Association would be expected to be robust enough to play a major part in trail management, promotion, and funding. An auto tour would be completed. The environmental consequences of the alternatives are examined in the EIS.

The plan identifies the necessity of community partnerships to protect trail resources and provide appropriate trail user services. As a partnership endeavor, the success of this plan is not solely determined by the NPS; rather its success rests with the will and perseverance of other local government agencies, communities, organizations, neighborhood associations, and individuals who have the capacity and desire to implement actions within this plan.

This document is online at the NPS Planning and Public comment System at http://parkplanning.nps.gov/alka. A limited number of copies of this report are available from the mailing address below. In addition, the final CMP/EIS is available at the following public libraries on the island of Hawaiʻi and in Honolulu:

Hawaiʻi State Library
Bond Memorial Public Library
Hilo Public Library
Honokaʻa Public Library
Kailua-Kona Public Library
Keaʻau Public Library
Kealakekua Public Library
Laupahoehoe Public Library
Mountain View Public Library
Naʻalehu Public Library
Pahala Public Library
Thelma Parker Public Library

The release of this final CMP/EIS and published Notice of Availability in the Federal Register will be followed by a 30-day no-action period after which time the alternative or actions constituting the approved comprehensive management plan will be documented in a Record of Decision. For further information, contact the Superintendent, Ala Kahakai NHT, 73-4786 Kanalani Street, #14, Kailua-Kona, HI 96740 or by telephone at 808-326-6012.

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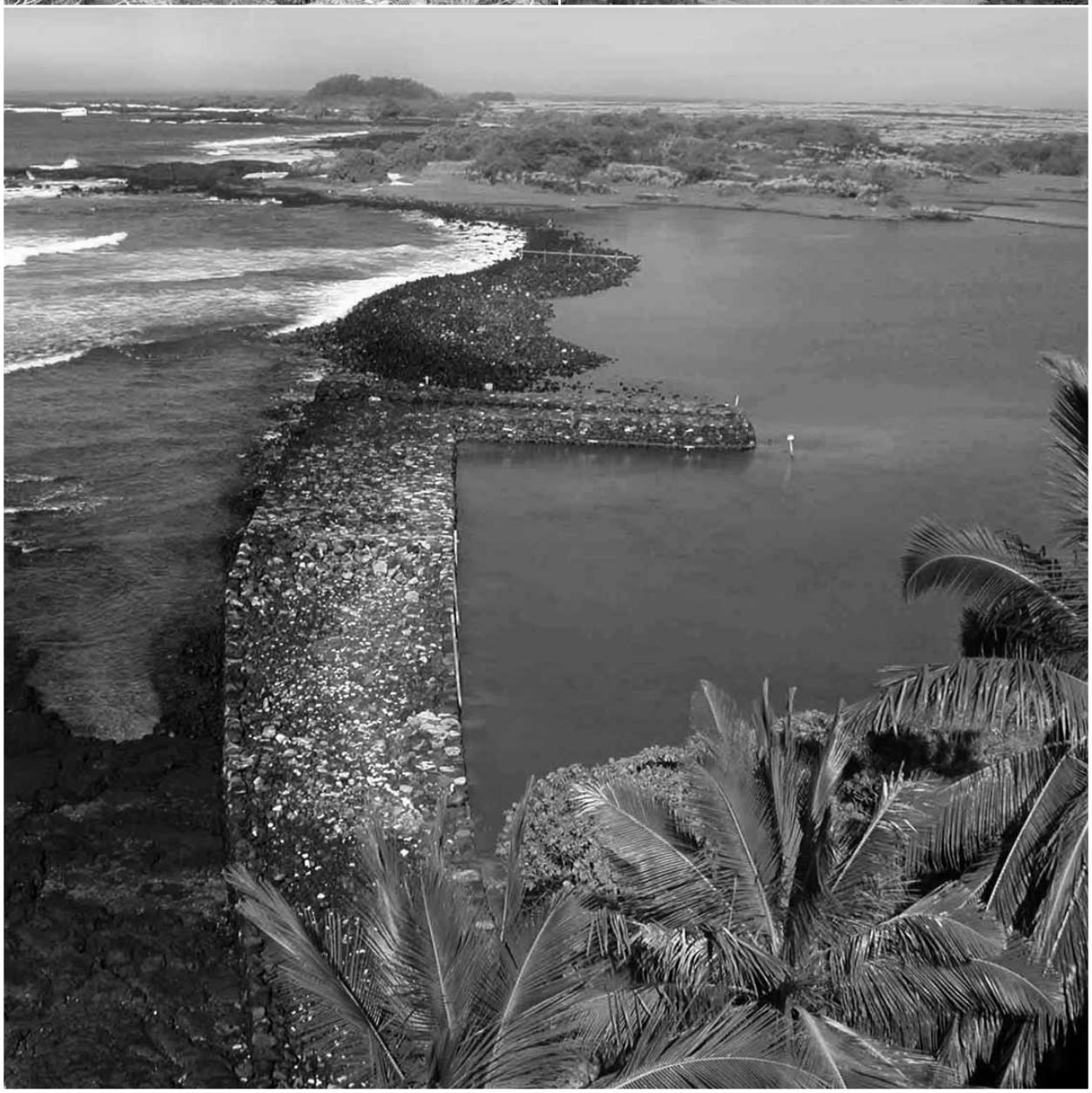


Introduction

Section 1: Introduction

Organization of This Document

This final comprehensive management plan and abbreviated final environmental impact statement is organized into four sections: 1) Introduction; 2) Errata; 3) NPS Responses to Substantive Comments from Meetings and Correspondence; 4) Copies of Agency, Organization, and Individual Correspondence

Section 1, Introduction
This section summarizes the public participation in developing and reviewing the draft CMP/EIS and provides a summary of public comments on the plan.

Section 2, Errata
This section contains the corrections and revisions to the draft CMP/EIS that are incorporated into the final plan, which includes the proposed action. Reading of this section is best done with a copy of the Draft CMP/EIS at hand. The plan is available at **http://parkplanning.nps.gov/alka**. Once at the site, select "comprehensive management plan," then "document list", then "draft comprehensive management plan/environmental impact statement." Compact disks and a limited number of printed copies are available through the superintendent's office.

Section 3, NPS Responses to Substantive Comments from Meetings and Correspondence
Consistent with the requirements of 40 CFR 1503, the NPS planning team provided written responses to those pieces of correspondence that have either substantive comments or comments that the team felt needed clarifying.

Substantive comments are defined by Director's Order 12, "Conservation Planning, Environmental Impact Analysis, and Decision-Making" (NPS 2006) as those comments that

- Question, with reasonable basis, the accuracy of information in the EIS
- Question, with reasonable basis, the adequacy of environmental analysis
- Present reasonable alternatives other than those presented in the EIS
- Cause changes or revision in the proposal

Substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the preferred alternative or other alternatives, or those that only agree or disagree with NPS policy, are not considered substantive.

In this section, comments and their responses are organized by topic heading to help guide the reader. Individual substantive comments are responded to directly. For subjects that received more than one substantive comment, the issue is summarized and then representative quotes are provided. The agency's response follows comments on each topic.

Section 4, Copies of Agency, Organization, and Individual Comment Letters
As required by 40 CFR 1503, copies of all letters from agencies are included. Because they offer substantive comments, offer information, or express the range of concerns expressed by the public, copies of all letters from organizations and a representative sample of letters from individuals are also included. All substantive comments from these letters are responded to in Section 3, NPS Responses to Substantive Comments from Meetings and Correspondence. All letters, emails, and comments submitted through the Planning, Environment, and Public Comment (PEPC) web site will be available to the public as part of the administrative record for the project after the Record of Decision is signed.

Development of the Draft Plan/EIS

The April 4, 2003, publication of the Notice of Intent to prepare an environmental impact statement for the comprehensive management plan for the Ala Kahakai NHT initiated the public scoping period. During the three-month period, the NPS conducted nine open house meetings attended by 200 people representing the general public, private landowners, trail advocacy groups, Native Hawaiian organizations, and state, county, and federal agencies. In addition, the planning team met with numerous individuals, community groups, private landowners, and government agency representatives to understand their concerns and visions for the Ala Kahakai NHT.

Using the information from all of these sources, the NPS planning team developed five alternatives for management of the trail: Alternative A, No Action; Alternative B, Single Ala Kahakai Trail; Alternative C, Ahupuaʻa Trail Systems; Alternative D, Historic Trail Clusters; Alternative E, Public Lands. The public was invited to comment on these alternatives by using a printed booklet or by attending one of nine public meetings conducted in April and June of 2004. A draft alternatives document was then

prepared that eliminated alternative E because it appeared to be the initial step in completing an entire trail and therefore would be incorporated into the other alternatives. During development of the draft plan and environmental impact statement, the planning team eliminated alternative D from further consideration because it had been considered and rejected in the *Feasibility Study* for the trail, Congress had designated a continuous linear trail, and the public did not support it as a stand-alone alternative, suggesting that historic segments are a place to start to develop a continuous trail.

Distribution of the Draft Plan/EIS, Public Outreach, and Response

The *Ala Kahakai NHT Draft Comprehensive Management Plan and Environmental Impact Statement* and EIS (CMP/EIS) was printed during the month of September 2007, during which time a newsletter including the executive summary of the draft was sent to a mailing list of over 1000 persons. On October 4, 2007, the draft was made available on the NPS Planning, Environment and Public Comment website (http://parkplanning.nps.gov/alka). Over two hundred copies of the printed draft and ten in compact disk (CD) format were distributed in late October to agencies, organizations, and the public who had participated in the planning process, requested a copy, or were identified by the NPS as potentially having an interest in the project. Another approximate 150 copies and several CDs were handed out at public meetings or through requests to the superintendent. The 60-day public review and comment period began with publication of a Notice of Availability in the *Federal Register* on October 26, 2007. The public review and comment period ended on December 31, 2007, but the NPS continued to receive and accept comments for an additional two weeks.

In addition to the solicitation of written comments, a series of six public meetings and open houses were held in the following six communities on the island of Hawaii from November 5 through November 10, 2007: Kailua-Kona, Captain Cook, Pāhala, Waimea, Hilo, and Kapaʻau. These meetings were advertised through the September trail newsletter mailed to approximately 1000 individuals, flyers distributed throughout the trail corridor, and articles that appeared in *West Hawaii Today* and the *Kaʻū Calendar* in late October and early November.

Ninety people signed in at the public meetings, 30 of whom were not on the NPS mailing list, suggesting that meeting announcements and publicity were successful. Aside from approximately 83 individual statements recorded on the meeting flip charts and 21 comment sheets completed at the meetings, the NPS received 40 responses via the Planning, Environment, and Public Comment website or other written communication. Many of the written comments came from people who had attended and commented at the public meetings.

The preponderance of public comment indicated that NPS is pursuing the correct path for the national trail in Alternative C: Ahupua'a Trail Systems, the selected and environmentally preferred alternative. The extent of the combined oral or written comments received were not substantive to the point of requiring the development of an entire new alternative, making major changes or revisions to an existing alternative, or requiring major modifications to the proposed action.

After conducting the public comment period on the draft *CMP/EIS*, the planning team concluded that the changes to the draft document were minor and confined primarily to factual corrections that do not modify the analysis; therefore, an abbreviated format was selected. Use of this format complies with the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (40 CFR 1503.4[c]). The abbreviated format requires that the material in this document be integrated with the draft CMP/EIS to describe the final plan, significant environmental impacts, and public comments that have been

Public Meeting in Kona, NPS photo

received and evaluated. Additional copies of the draft are available upon request.

Summary of Public Comments

Following is a brief summary of the topics receiving the most focus from both written and oral comments. The NPS staff reviewed and considered all comments received in preparation of this final plan and environmental impact statement. Summarized below are agency comments; comments from the public follow.

Comment topics and concerns expressed by agencies:

- The EPA rated the draft EIS as LO—Lack of Objections, with recommendations that we work closely with state and county agencies to ensure protection of watersheds and marine areas in the trail vicinity. Specific text regarding watersheds and marine areas is included in the Errata section and thereby incorporated into the proposed action.
- The U. S. Coast Guard listed 13 Aids to Navigation along the trail route that need to be accessible. These are named in the Errata section.
- The U.S. Fish and Wildlife Service agreed with the conclusions of the draft that the project is not likely to have a negative impact on listed species and that it has much potential for positive impacts to native ecosystems and listed species. Two suggestions, made to assist the NPS in avoiding negative impacts to the endangered Hawaiian Hoary bats, are included in the Errata section.
- The Hawaii State Department of Land and Natural Resources Nā Ala Hele Trails and Access Program, while preferring Alternative B: Single Trail as simpler to manage, deferred to the NPS on our choice of alternative C based on the input of the Hawaii Island community. The Program Manager recommended several clarifications of the draft statements regarding state law and these are included in the Errata section. In addition, Nā Ala Hele raised concerns that the public may attempt to link sections of trail regardless of the degree of sustained management and that reliance on community organizations should not usurp NPS efforts to obtain sustainable staffing and funding base.
- The Hawaii Department of Transportation reserved the right to review NPS plans as they relate to their facilities. The management plan expresses the intention to provide advance consultation and to coordinate with all involved landowners and state agencies, which would include DOT. Specific mention of DOT is made in the Errata section under the roles of the state of Hawaii, thereby incorporating it into the proposed action.
- Hawaii State Parks foresees challenges for trail implementation regarding funding, agreements with landowners, camping, security at trailheads, accessibility to medical attention, illegal commercial activity on government lands, and issues of carrying capacity. These comments are addressed in the "Response to Comments" section.

Major comment topics and concerns expressed by the public:

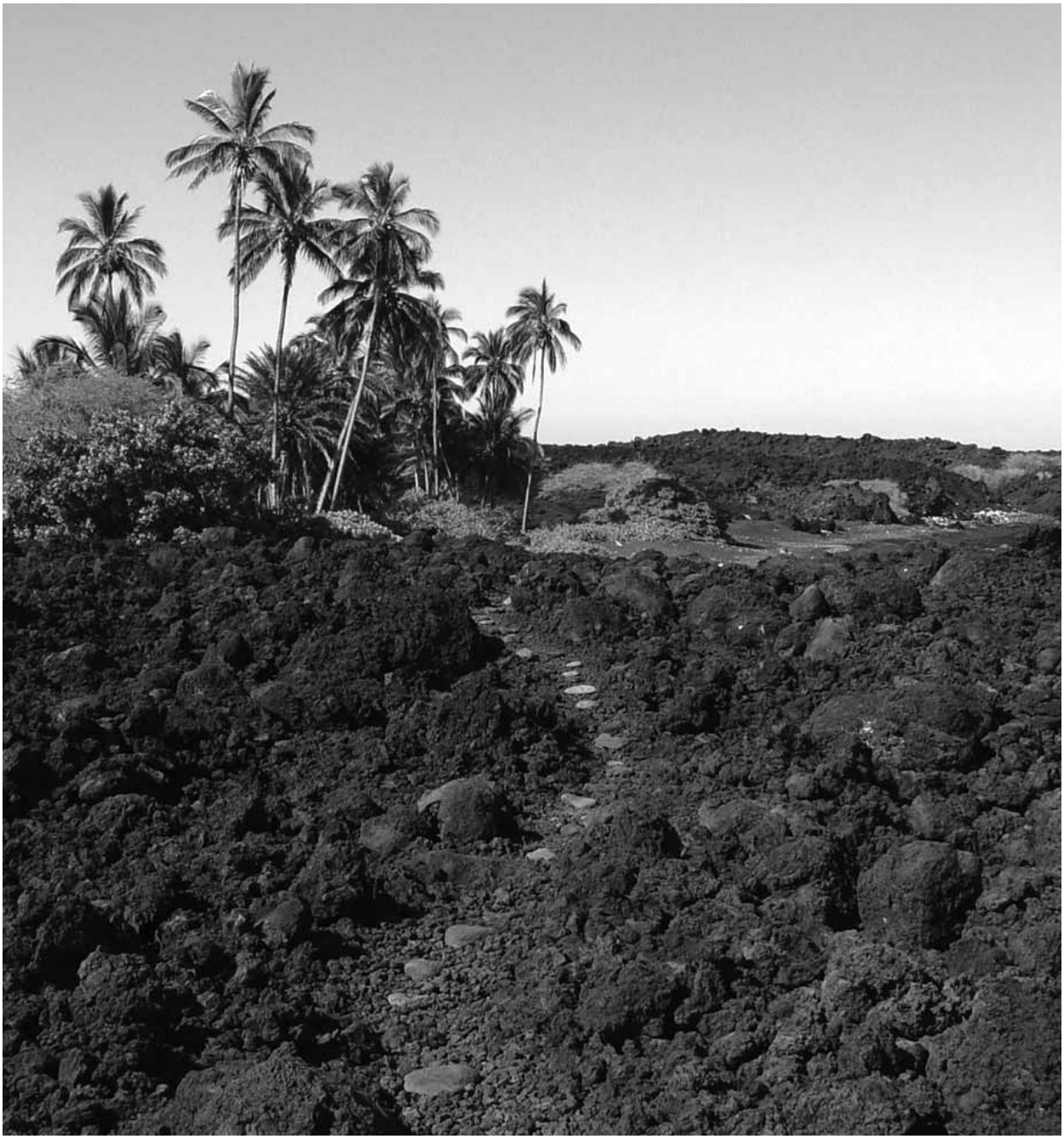
- **Impacts of increased public access, especially on cultural resources:** Twenty-four separate statements reflected concerns that increased public access enabled by the national trail would have negative effects on sacred and historic Hawaiian sites and other cultural and natural resources, especially in currently remote areas along the trail route.
- **Capacity for Management:** Even though supporting alternative C, 11 commenters expressed concerns about the capacity of the NPS to effectively develop and support community-based management or to take on such a project at all. In addition, eight commenters specifically questioned the capacity of the Ala Kahakai Trail Association to fulfill the management role outlined for it.
- **Priorities:** Seventeen comments focused on priorities. Some suggested expanding the priority area for developing a continuous trail. The planning team agreed with one of these suggestions that the priority area for trail use should extend beyond Puʻuhonua o Hōnaunau NHP for about two miles to Hoʻokena Beach. This change is noted several places in the Errata and incorporated in the proposed action.

Several commenters suggested that the priority area be extended to more remote areas, extended on either end, extended around the island, or extended to include more *mauka-makai* trails and other recreational trails. Also, several suggested there should be a priority placed on getting the trail on the ground, marked, and mapped.

- **Trail Operations:** Several commenters felt that funding, staff, and budget were inadequate to the tasks outlined in the plan. Some wondered what the NPS would do in the event that fund raising by community-based organizations, especially the Ala Kahakai Trail Association, falls short of expectations.
- **Preference for Alternatives Other than Alternative C:** Three landowners and one botanist preferred Alternative D: Historic Trail Clusters and a fourth preferred either alternative D or failing that, Alternative A: No Action. In general, they argued that developing non-historic connector trails to tie together historic segments is not historically accurate.
- **Natural Resources:** Individual comments suggested restoring dryland forests and preserving native trees, standardizing resource management measures for special ecosystems along the trail route, considering the effects of erosion and soil run-off when clearing trails, and using environmentally responsible methods for weed removal.
- **Coordination with Others:** Several statements suggested agencies and organizations with whom the NPS could coordinate in implementing the plan. Since the draft plan states that the NPS intends to coordinate with all affected or interested organizations, agencies, and individuals, these comments provide helpful reminders.
- **Other Comments:** Comments supported non-motorized uses, a centerline survey of the trail, and recreational uses such as camping water catchment. In addition, offers of help came from individuals, private landowners, and organizations.

Ali‘i Drive, Kailua, N. Kona, NPS photo

Shoreline Trails, Makalawena, N. Kona, NPS photo



Trail to Luahinewai, Kīholo, North Kona, NPS photo

Errata

Section 2: Errata

This section contains the corrections and revisions to the draft CMP/EIS that are incorporated into the final plan, which is the proposed action. Reading of this section is best done with a copy of the Draft CMP/EIS at hand. The plan is available at **http://parkplanning.nps.gov/alka.** Once at the site, select "comprehensive management plan," then "document list", then "draft comprehensive management plan/environmental impact statement." The plan is also available at local libraries on the island of Hawaii and at the main library in Honolulu. Compact disks and a limited number of printed copies are available through the superintendent's office.

Changes to the document have been handled in the following way:

- Chapter titles relating to the draft CMP/EIS are identified first for ease of reference.
- Page numbers refer to the page numbers in the *Ala Kahakai NHT Draft Comprehensive Management Plan and Environmental Impact Statement*.
- Paragraphs cited are counted beginning with first full paragraph on the page or are counted after the specific section cited.
- Text to be removed from the draft document appears as ~~remove~~.
- Text to be added appears underlined.

General Edits

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Page vi, under Alternative C and after Alternative C: Costs 95

> Alternative C: Funding 98

Page vi, Chapter 3 The Affected Environment, after land Use 111

> The Affected Environment 115 placed at left margin and aligned with the word "Introduction"

Page vi, Chapter 3 The Affected Environment, after Natural Resources and Values

> Scenic and Visual Resources 127

Executive Summary

Page xiii, column 2, under **Actions Common to All Alternatives**, paragraph 5

> An initial administrative focus on the ~~73~~ 75-mile corridor from Kawaihae through Pu'uhonua o Hōnaunau NHP to Ho'okena (see map 1) for development of trail segment management agreements.

Page xiv. column 2, under **Alternative B: Single Trail**, paragraph 1, line 4

> Within the planning period of 15 years, the goal would be to complete the linear trail within the priority zone from Kawaihae ~~though~~ through Pu'uhonua o Hōnaunau National Historical Park to Ho'okena and to protect other segments outside of that area as feasible.

Page xv, column 1, paragraph 3, line 1

> Costs for this alternative are based on incorporating ~~73~~ 75 miles of trail roughly from Kawaihae through Pu'uhonua o Hōnaunau NHP to Ho'okena into the Ala Kahakai NHT by the end of the planning period of approximately 15 years.

Page xvi, column 1, top paragraph, line 1

> ~~In order to better support interpretation of the Hawaiian trails as a system, focus of this alternative would lie in those areas containing multiple alignments, and a~~ Priority would be placed on developing a continuous linear trail, completion of which would be a long-term goal. To support interpretation of Hawaiian trails as a system, there will be selective focus on a few areas containing multiple alignments, both lateral and *mauka-makai*.

Page xvi, column 2, paragraph 2, line 1

> Costs for this alternative are based on incorporating ~~88~~ 90 miles of trail roughly from Kawaihae through Pu'uhonua o Hōnaunau NHP to Ho'okena into the Ala Kahakai NHT during the planning period of approximately 15 years by adding 15 miles of *mauka-makai* trails to the ~~73~~ 75 miles of trail in alternative B.

Chapter 1: Introduction

Page 12, column 2, beginning at line 10 (editorial correction suggested by Curt Cottrell, Nā Ala Hele

Program Manager)

However, the research used to document the claim by the ~~government~~ state may be legally challenged for a variety of reasons if the claim is adverse to the landowner. The trail ownership may ultimately be adjudicated in court. Until such time that a quitclaim deed is executed between the state and the adjacent private landowner, and it is recorded with the Bureau of Conveyances, the title to a specific trail feature may be subject to challenge over time by future landowners.

~~Opening~~ Restoring managed public access to a ~~state trail to the public~~ trail that has been confirmed to be state owned via a quitclaim deed or access has been negotiated through other forms of documentation, may require~~s~~ a cultural survey and potential preservation or re-construction, management, maintenance, and vehicular access, parking and signage plans that consider the perpetual commitment of staff time and funding resources. ~~If resources are lacking to open them to public use, often the trails may be "land banked" that is held by the state without a management entity and not open to the public.~~ In most cases for these segments of coastal *ala loa*, there is currently insufficient state staff and funding for the pertinent planning and management. Therefore, the abstract data collected by Nā Ala Hele is documented on a database and, if a segment of the *ala loa* is still physically intact, may remain subject to unmanaged public use based on its location and its potential to provide shoreline access.

~~Several state-owned segments with potential to be components of the Ala Kahakai NHT are land banked at this time~~. The Feasibility Study identified 35 miles of ~~potential state trail~~ trails crossing private lands as being subject to the Highways Act and that may be eligible ~~for inclusion~~ to include as ~~part~~ authorized segments of the Ala Kahakai NHT.

Page 33, column 2, paragraph 3, line 9 (editorial correction suggested by Curt Cottrell, Nā Ala Hele Program Manager)

~~Trails included in the Na Aka Hele system must be determined to have a functional value to be included in the system.~~ Currently, trails that are determined to have value for managed public access in a manner that would not inadvertently jeopardize sensitive cultural features, and that have a capacity for management by either Program staff or through an agreement with a private landowner, may be added to the legal jurisdiction of the Program and subject to Chapter 13-130, Hawaii Administrative Rules.

Page 35, column 2, paragraph 2 (editorial correction suggested by Peter Young, ʻOʻoma Development)

ʻOʻoma Development: Planning continues for this private development. Adjacent and north of Kohanaiki, it includes residential uses, ~~an 18 hole golf course,~~ a public shoreline park with facilities and camping, and an alignment of the Ala Kahakai NHT as the existing shoreline trail. The proposed plans for ʻOʻoma preserve the Māmalahoa Trail in place with a buffer on both sides. The historic Māmalahoa Trail is approximately 10 feet wide within a 30-foot wide easement and runs north-south through the property. A buffer of 50 feet on both sides of the trail will remain undisturbed. Therefore, the Māmalahoa Trail with the buffer will provide a 110-foot wide open space corridor, which is approximately 2,520 feet long, and includes approximately seven acres. There will also be an additional 60-foot building setback from the buffer on both sides. The Ala Kahakai National Historic Trail is located within the property area designated as shoreline park and coastal preserve. The 18 acres along the shoreline will be designated as a public shoreline park and will be an extension of the beach parks planned at The Shores at Kohanaiki and NELHA [National Energy Laboratory of Hawaii]. The shoreline park will include parking, comfort station, and a cultural public-use facility. These park buildings will be located approximately 330 feet away from the shoreline and outside of the shoreline setback area. The 57 acres *mauka* of the shoreline park will be designated as coastal preserve because this area contains known archeological and cultural sites, including burials. To protect

the integrity of these sites, the coastal preserve will remain generally undisturbed and development will be prohibited, with the exception of trails between the community and the shoreline.

Chapter 2: Alternatives for Management

Page 42, column 2, paragraph 1, **Compliance with state preservation laws**, add at end of paragraph

The NPS will seek a memorandum of understanding with the SHPD to encourage consistency in the preservation, development, management and marking of the trail through various jurisdictions.

Page 45, Column 1, paragraph 2, line 12

If a trail segment requires construction, it will be located so as to avoid trampling or removal of native plants and adverse effects on sea turtle or Hawaiian monk seal resting areas.

Page 46, column 1, paragraph 1, line 6

Once a baseline is established, a monitoring program will determine the significance of the impacts. Should it be found that the Ala Kahakai NHT provides opportunities for outsiders or even local individuals to overfish or loot an area of nearshore or reef resources, trail use in the area will be closely monitored and closed if necessary and the individuals will be prosecuted to the limits of the state and federal law. The goal would be to prevent these incidents from happening through close oversight of sensitive areas and enforcement of the law.

Page 46, column 2, after paragraph 1, **Endangered Plant and Animal Species**, insert the following:

Specific suggestions for Endangered Hawaiian Hoary bats *(Lasiurus cinereus semotus)* and endangered Hawaiian hawks *(Buteo solitarius)*, which nest in both exotic and native woody vegetation, include the following. To avoid impacts to the bats, no woody plants suitable for bat roosting should be removed or trimmed during the bat birthing and pup rearing season (April to August). In addition, if the project involves fencing, the use of barbed wired will be minimized to avoid impacts to bats. To avoid negative impacts to hawks, brush and tree clearing or trimming should not occur during the hawk nesting and breeding season (March through September), if hawk nests are present. Thus, surveys for hawk nests should occur prior to trimming or clearing activities.

Page 46, column 1, after paragraph 1, insert the following heading and paragraph

Watersheds and Marine Areas

Due to the sensitive nature of the watersheds and marine areas in the trail vicinity, the NPS will work closely with state and county agencies to ensure protection of these areas from soil erosion and other negative effects during construction or maintenance projects and during operations. The NPS will consult with the Big Island Soil and Water Conservation District office, County of Hawaii, and with the Hawaii State Department of Health regarding best management practices and appropriate permits for these activities.

Page 50, column 2, after bulleted statement

Landowner participation in the Ala Kahakai NHT is voluntary, though encouraged, and requires an agreement between the willing landowner and the NPS. Land would be acquired, if at all, only from willing sellers and donors. If a proven state-owned trail that is eligible for the Ala Kahakai NHT passes over private land, federal laws would apply only to the trail right-of-way and agreed upon adjacent areas and not to the rest of the landowner's property. State and county laws that apply to landowners now would continue to do so. If a linking trail opportunity exists on private property that is not required through some state or county provision, it would be at the landowner's discretion to participate. Landowners may wish to protect for public use and enjoyment resources adjacent to and associated with the trail. Experience on other national trails indicates that many landowners take pride in preserving trail resources. Recognition of trail sites provides a positive way for landowners to help preserve resources without giving up ownership rights. Interested landowners could be encouraged to incorporate their resources into the Ala Kahakai NHT so that they would receive the benefits of NPS

technical and possible financial assistance in protecting those resources. Easements and partial interests in land can sometimes provide significant tax relief under the National Trails System Act, as amended, section 7(k).

Page 51, column 2, paragraph 2, line 4

. . . the Ala Kahakai NHT administrative staff will initially focus on the ~~73~~ 75-mile corridor from Kawaihae through Pu'uhonuna o Hōnaunau NHP to Ho'okena. . . .

Page 61, column 1, after the first five lines, add

- Numbers of fires and numbers of injuries as indicators of overuse

Management actions that may be considered to avoid or minimize these impacts include: educate users on the potential for fire and injury and the ways to avoid them, limit or disallow fires; reduce use levels in areas where fires or injury are frequent.

Page 61, column 2, end of last paragraph, add

. . . reduce use levels, schedule visits by large groups.

Page 70, column 1, paragraph 2, line 5

Within the planning period of 15 years, the goal would be to complete the linear trail within the priority zone from Kawaihae through Pu'uhonua o Hōnaunau National Historical Park to Ho'okena and to protect other segments outside of that area as feasible.

Page 73, column 1, paragraph 2, line 5 (editorial correction suggested by Curt Cottrell, Nā Ala Hele Program Manager

Some of these segments are land-banked~~, with the Department of Land and Natural Resources~~ via documentation that may include, but is not limited to, both the Nā Ala Hele abstract database, documents filed with the State Historic Preservation Division, or approved Conservation District Use Applications that may technically be considered under the jurisdiction of the State Land Division. The jurisdiction is challenged when an affected private landowner disputes the claim of state ownership and there is pending litigation. Such trail segments and associated features would remain in an unmanaged condition until such time as either the NPS or Nā Ala Hele has resolved the ownership issue and has the capacity to manage them.

Page 73, column 2, after the bullets insert the following

Trail alignment will not interfere with the access of the U.S. Coast Guard to its 13 aids to navigation, one each at 'Upolu Point, Māhukona, Keahole Point, Keawekāheka Point, Keauhou Bay, Ho'opuloa, Kamaoa Point, and Honokōhau; two in the vicinity of Kailua Bay; and three in the vicinity of Kawaihae.

Page 78, column 1, paragraph 2, Line 1

This cost estimate is based on completing the ~~73~~ 75-mile section of trail from Kawaihae (Pu'ukoholā Heiau NHS) through Pu'uhonua o Hōnaunau NHP to Ho'okena by the end of the approximate 15-year life of the CMP.

Page 78, column 1, paragraph 3 line 7

Other needed disciplines (administrative assistant, archeologist, ethnographer, cultural landscape specialist, GIS specialist, trail management/maintenance coordinator, title researcher/abstractor) would be shared with other federal or state parks or provided through the Ala Kahakai Trail Association.

Page 78, column 2, **Table 6: Alternative B, Staffing Goals** add under "Other Needed Disciplines"

Title Researcher/Abstractor

Page 80, column 1, paragraph 2, line 1

Table 8 estimates the funds needed to complete the ~~73~~-75mile portion of the Ala Kahakai NHT within the 15-year period of this plan in FY 2007 dollars.

Page 86, column 1, paragraph 2, line 6

A continuous linear trail would be ~~included~~ a priority in this alternative as in alternatives A and B. Initial focus ~~would lie in those public lands containing~~ for incorporating multiple trail alignments, both lateral and *mauka-makai*, would lie in selected public lands.

Page 87, column 1, after paragraph one, insert

> The NPS will consult and coordinate with the State Department of Transportation (DOT) and its divisions (airports, harbors, and highways) regarding those locations where the trail may affect the lands, easements, or rights-of-way under its jurisdiction. Details of responsibilities related to implementing the trail will be worked out collaboratively, and the DOT will be asked to review and comment on plans by the NPS when they relate to locations where the trail affects or enters its facilities.

Page 88, column 1, after paragraph 2, **The State of Hawaii,** insert the following paragraphs

> Proposed land uses within the Conservation District shall be reviewed by the Department of Land and Natural Resources to determine what type of authorization may be required prior to implementation. The NPS may apply for a blanket authorization Conservation District Use Permit to implement minor land uses such as signage and trail identification markers for areas within the Conservation District for the entire trail length to insure consistency of trail indicators.

Page 88, column 1, paragraph 3, **The County of Hawaii**, line 13

> ~~County Planning would include the NPS in the mailing list for the Planning Commission to alert the NPS to possible development affecting the Ala Kahakai NHT.~~ The County Planning Department will work with the NPS to develop a system whereby project applications determined to have potential impacts on historic trails within the Ala Kahakai corridor are sent to the Ala Kahakai NHT administration for review and comment. The notification system will provide approving agencies and applicants clear guidelines on when the Ala Kahakai NHT should be included in the review process. Such applications include Subdivisions, Special Management Area Assessments and Use Permits, Special Permits, Grading, Project Districts, Rezoning, State Land Use District Boundary Amendments, Leases of State-owned lands, Environmental Assessments, and Environmental Impact Statements.

Page 89, column 2, paragraph 2, line 5 (editorial correction suggested on a Kona Outdoor Circle meeting comment sheet, 11/5/2007)

> These trusts include such groups as the Trust for Public Land, Nature Conservancy of Hawaii, ~~Kona Land Trust~~ Hawai‘i Island Land Trust, and the “kingdom trusts” of Kamehameha Schools, Queen Emma Foundation, and the Liliuokalani Trust.

Page 90, column 1, after paragraph 1 insert the following

> Trail alignment will not interfere with the access of the U.S. Coast Guard to its 13 aids to navigation, one each at ‘Upolu Point, Māhukona, Keahole Point, Keawekāheka Point, Keauhou Bay, Ho‘opuloa, Kamaoa Point, and Honokōhau; two in the vicinity of Kailua Bay; and three in the vicinity of Kawaihae.

Page 95, column 2, paragraph 2, line 1

> This cost estimate is based on completing, by the end of the approximately 15-year life of this CMP, ~~88~~ 90 miles of trail: the ~~73~~- 75-mile linear section from Kawaihae (Pu‘ukoholā Heiau NHS) through Pu‘uhonua o Hōnaunau NHP to Ho’okena and 15 miles of *mauka makai* trails on federal or state lands.

Page 96, column 1, paragraph 1, line 9

> Other needed disciplines (administrative assistant, GIS specialist, trail management/ maintenance coordinator, archeologist, anthropologist/ethnographer, cultural landscape specialist, ecologist, title researcher/abstractor), and trail crew would be shared . . . .

Page 96, column 1, **Table 9: Alternative C Staffing Goals** add under “Other Needed Disciplines”

> Title Researcher/Abstractor

Page 97, column 1, paragraph 1, line 5 (editorial correction suggested by Curt Cottrell, Nā Ala Hele Program Manager)

> Within the ~~73~~- 75-mile sections of trail, Nā Ala Hele ~~owns 21 miles~~ has documented that approximately 21 miles may be subject to the Highways Act and qualify as state owned.

Page 98, column 1, paragraph 2, last line

If this anticipation is not met, the projects and programs projected under alternative ~~B~~ C may be only partially met.

Page 166, column 1, paragraph 2, **Analysis**

Completion of the ahupuaʻa trail system for the Ala Kahakai NHT would provide some additional access to fisher trails and coastal resources for traditional gatherers and other visitors. Although local fishers may enjoy having better access to nearshore fish resources, they fear that it would allow outsiders access to denude an area of nearshore resources to sell commercially. Should it be found that the Ala Kahakai NHT provides opportunities for outsiders or even local individuals to overfish or loot an area of nearshore or reef resources, trail use in the area will be closely monitored and closed if necessary and the individuals will be prosecuted to the limits of the state and federal law. The goal would be to prevent these incidents from happening through close oversight of sensitive areas (recommended by local fishers and gatherers) and enforcement of the law.

Page 186, column 2, paragraph 2 heading

Landowners~~hip~~

Page 192, column 1, paragraph 2, line 3 (editorial correction suggested by Curt Cottrell, Nā Ala Hele Program Manager)

NPS management of confirmed state owned segments of trail could have long-term beneficial effects ~~on trail management and~~ on the ~~relationship between Na Ala Hele and the NPS.~~ ability of both the state and the NPS to preserve and sustainably manage intact segments of *ala loa* within the Ala Kahakai NHT corridor.

Appendices

Appendix F: Draft Memorandum of Understanding Between the National Park Service Department of Land and Natural Resources—State of Hawaii and the County of Hawaii for the Implementation, Management, Protection and Public Use of the Ala Kahakai National Historic Trail

Page 257, Article II: Authority, line 3 (editorial correction suggested by Samuel J. Lemmo, State Office of Conservation and Coastal Lands)

B. Hawaii Revised Statutes (HRS) Chapters 6E, 115, 171,183C, 184, 198D, 205, 205A, 264-1, and section 46-6.5

C. Hawaii Administrative Rules (HAR) 13-5, 13-275-284, 13-300, 13-221, 13-146, 13-130

Page 259, under Key Officials and "For DLNR" (editorial correction suggested by Curt Cottrell, Nā Ala Hele Program Manager)

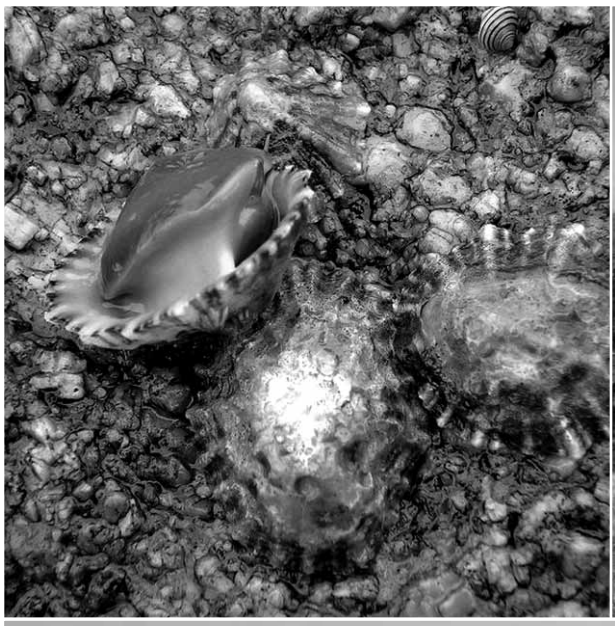
Curt Cottrell, Program Manager, Nā ala Hele

Page 259, under "The appropriate County Departments agree to:" line 7

7. ~~Include the Ala Kahakai NHT administrative office on the mailing list for the Planning Commission.~~

Work with the NPS to develop a system whereby project applications determined to have potential impacts on historic trails within the Ala Kahakai corridor are sent to the Ala Kahakai NHT administration for review and comment. The notification system will provide approving agencies and applicants clear guidelines on when the Ala Kahakai NHT should be included in the review process. Such applications include Subdivisions, Special Management Area Assessments and Use Permits, Special Permits, Grading, Project Districts, Rezoning, State Land Use District Boundary Amendments, Leases of State-owned lands, Environmental Assessments, and Environmental Impact Statements. The County agrees to contact the NPS regarding these reviews in a timely manner.

Above: Monk Seal, below: Pohuehue Beach Morning Glory, NPS photos



Responses to Comments

Section 3: NPS Responses to Substantive Comments from Meetings and Correspondence

Comments and responses are organized according to the order of the alternatives presentation in the draft CMP/EIS. Beneath each heading, specific topics are addressed. All responses to written comments are made in this section. Letters from agencies and organizations are printed in their entirety in Section 4.

Hawaiian names and spellings are as they appeared in the correspondence. All comments are taken directly from the correspondence or from the flip charts or comment sheets recorded in the public meetings. Comments from public meetings are identified by the location and date of the meeting and noted in brackets [ ]. All other comments are taken from letters. Within quotations of written comments, the editor has inserted comments in brackets for clarity.

Administration, Management, and Partnerships

Topic: Capacity for Management

Even though supporting alternative C, eleven commenters expressed concerns about the capacity of the NPS to effectively develop and support community-based management or to take on such a project at all. In addition, several commenters questioned the capacity of the Ala Kahakai Trail Association to fulfill the management role outlined for it.

Comments

- How can we propose to manage 175 miles when we can't manage what we already have (e.g. in Hawaii Volcanoes NP)? [Yano Hall 11/6/2007 public meeting]
- It is challenging, if not impossible, to accurately assess the adequate degree of funding and necessary staffing associated with implementing either Alternative B or C. However, NPS should consider that the public expectation that may be fostered by the current and future publicity associated with the development of Ala Kahakai will make protecting unfunded and unmanaged sections of intact ala loa (and ancillary cultural features) very challenging and may also exacerbate trespass issues.
- Alternative C is my first choice, although I have concerns that the "devil will be in the details." The DCMP/EIS contains many good intentions, but is short on contingency plans should the NPS encounter great difficulty in developing a "viable and highly effective" Trail Association, lack of stable and consistent support from community partnerships, and/or insufficient landowner and non-federal agency participation.

Response: Staffing costs for Alternatives B and C are stated in the CMP. In anticipation of the adoption of the CMP, a request for federal funding for staff has been submitted via the NPS Pacific West Regional Office. In addition, in fiscal year 2008, the U.S. Congress increased the annual base funding for the Ala Kahakai NHT from $260,000 to $420,000. In May of 2008, a full-time archeologist was hired and an Interpreter/volunteer coordinator will be hired in 2009 subject to availability of funds.

Managing trails within the Ala Kahakai corridor is dependent on the development of partnerships with state and county agencies, landowners, and communities. The initiative for federal designation of the trail came from the community, and we believe that this plan is a reflection of the will of the community to participate in the management of a viable trail system. Ala Kahakai NHT administration and Ala Kahakai Trail Association and other partners will focus on building the capacity of communities to plan and sustain management of the trail. We are aware of the increased interest in the Ala Kahakai NHT and those who inquire are directed to managed segments of the trail located within the three NPS units in West Hawaii and to the existing Ala Kahakai State Trail located in South Kohala. No segment of the trail shall be open to the public marked as the "Ala Kahakai NHT" without active, on-the-ground management in place, and the trail will not be opened all at once but in segments. Trespassing is already occurring and, with the population ever-growing, trespassing, whether conscious or not, will increase as demand for shoreline access increases. Government and private landowners cannot manage these lands alone. Hence the need for partnering and community involvement in educating the public and in sustained management of trail segments.

Comments:

- Very little is stated about AKTA (Ala Kahakai Trail Association). The public needs to be included. More discussion, public forums need to be held. [Kohala Intergenerational Center 11/10/2007 Public Meeting]
- P. 88 of the DCMP/EIS openly states that if this Association's "capacity does not develop as anticipated," projects and programs may not be realized. The DCMP/EIS describes substantial reliance by NPS upon state, county and private entities to assume 50% - 60% of the costs and other responsibilities for trail segments. To achieve this, stable and committed partnerships must be formed. I saw little detail in the DCMP/EIS about the Ala Kahakai Trail Association. Since other NHTs rely upon "a variety of partners ... to help with planning, constructing, managing, monitoring, and interpreting the trail with funds and in-kind services," (pp. 80 & 98), there must be lessons learned from the experiences of other existing NHT associations? How are NHT partnerships encouraged? How are the partners represented in the Association?
- The management plan clearly states that to make Alternative C come to fruition, a very robust non-profit trail partner will be required. This is a major concern of E Mau Na Ala Hele.
- Inclusion of the stake holders such as private landowners, resort management and community groups is vitally important; but the plan seems to assume greater participation than may be possible currently. For example although the community has been very involved in the national historic designation of the trail, a viable Ala Kahakai Trail Association does not currently exist. Na Ala Hele (State of Hawaii) has a dedicated trail crew but only funding for a couple of employees to maintain many miles of trails across the island.
- Involving local communities in any economic activity relating to the trail is a good idea, but there will need to be substantial assistance provided to these communities to establish sustainable organizations
- The capabilities of this program to ensure the preservation of cultural resources, cultural sites, natural resources, and burials is of utmost importance. The draft makes laudable acknowledgement of Hawaiian family engagement; however, there are no plans identified or developed to build community capacity and empower Hawaiian families to undertake the responsibility. With no clear funding support, the families will have all the responsibility without the means to fully realize the management needs. [Kona Outdoor Circle 11/5/2007 Comment Sheet]

Response: The Ala Kahakai Trail Association is established and registered with the State of Hawaii with an active four-person board in place. Board members include descendant/family representatives from three Districts in which the trail corridor is located. Board expansion will include a diverse range of members who can bring skills and connections to the effort. The board developed a strategic plan that includes goals, priorities, and strategies for communications and youth engagement and that is being implemented. Capacity building of this organization is taking place. For instance, in May 2008, board members attended a workshop on historic trails sponsored by the Partnership for the National Trails System. The trail association and the Ala Kahakai Trail office are currently working with a number of family groups at specific areas within the trail corridor on management planning, organizational capacity-building, and trail clearing projects. In this way, descendant-led, community-based management models, inclusive of the community-at-large, are being created. Cooperators in these efforts include other community-based non-profits, Hawaii Island National Park Service units and their supporting friends groups, the University of Hawaii, state, and county agencies.

Topic: Priorities

Seventeen comments focused on priorities for administration and management of the trail. A few of these comments are relevant to the plan and are responded to below. Many of the suggestions were either beyond the scope of the national trail legislation or beyond the scope of what can be accomplished in the 15-year planning period and are not incorporated here. These include suggestions to extend the trail to more remote areas, extend it on either end, extend it around the island, or extend it to include more *mauka-makai* trails and other recreational trails. These suggestions are not addressed here as substantive comments.

Comment

- I would encourage the inclusion of Hoʻokena as the initial southerly terminus. This would allow the remnant of the 1871 trail to actually "go somewhere" a characteristic that should be inherent in all trails. Hoʻokena Beach Park becomes a logical trailhead. Hoʻokena is also the southern terminus of the 60-mile Kona Heritage Corridor (along the Mamalahoa Highway from Puʻuwaʻawaʻa).

  Response: This suggestion, made by others, is now included in the plan for the reasons suggested. The trail is historic with visible evidence on the ground, is in the Nā Ala Hele inventory, connects to a national park, includes a campsite, and could be one of the first segments to become an official component of the Ala Kahakai NHT. This change adds two miles to the assessment of miles included in the alternatives. The Errata section incorporates several revisions required by this change.

Comments

- In addition, please consider expanding the "priority area" of the 15 year trail plan to encompass other areas along the trail path that may be threatened or in need of management. The current "priority area" only encompasses the areas of population density in the Kona and South Kohala areas; other trail corridor areas such as Mahukona, Miloli'i or South Point have significant use by locals and visitors and should be considered as a priority for management.
- … prioritize the most northerly segment of the trail corridor between Upolu Point and Lapakahi for several reasons:
  - It is significant to the history of not just the island of Hawaiʻi, but is unique in the role it played in the history of all the islands, as well.
  - It will integrate North Kohala into the trail development at an early stage, along with the other five districts that are traversed by the trail.
  - Inclusion of the historic transportation corridor of the Hawaiian Railroad Company reveals the role played by later transportation modes in the Kingdom of Hawaiʻi.
  - The Railroad corridor from Mahukona to Upolu would offer opportunities for alternative modes such as bicyclists to experience the corridor and provide a loop for hiking.
  - Extending protection and development initially may be more valuable in the long run than redeveloping the urban (Aliʻi Drive) and resort (Na Ala Hele) segments. Protecting and acquiring access rights for other sections outside of the priority area should remain high on the list of objectives. Opportunities due to local developments or property transactions should be seized to secure these other segments.

  Response: The trail corridor is defined by its enabling legislation. The National Trails System Act allows for trails that connect with the national historic trail to be designated and marked as components of the trail. Thus, other lateral and *mauka-makai* trails within the corridor may be included. While a priority trail segment is described in the CMP, Ala Kahakai staff continues to work with communities located outside of the priority area in providing information and technical assistance on trail protection, management planning, and related activities. The priority area is targeted because growing population within this area has resulted in increasing visitation, adverse impacts to the resources, and the inadequacy of facilities designed for smaller populations. (Page 51 in the plan contains the rationale for defining this area.) The aim is to develop well managed trail segments with suitable infrastructure improvements within the priority area. Management will be designed to protect and perpetuate the lifestyles of Native Hawaiian families and long-time residents of the area and to accommodate recreational demands of a growing population in the Kailua environs and the South Kohala resort communities. Providing for cultural and recreational opportunities for the growing population within the priority area will serve to relieve pressure and potential negative impacts on the more difficult to manage areas outside of the priority area.

Comment

- We would, however, like to caution that developing of the mauka-makai and other connecting trails should not overshadow identifying, preparing, and opening the main lateral shoreline trail. If resources are limited,

we advise selecting and concentrating on a few important trail hubs with the major mauka-makai trails, keeping the priority highest on the linear shoreline trail.

Response: The intent of the plan is to emphasize the development of the lateral shoreline or near shoreline trail but to recognize that this is a long-term project. The approach recommended in the comment is the one that is proposed; that is, maintaining the priority on the linear trail but also finding hubs on public lands where the lateral trails intersect *mauka-makai* trails. The errata for pages xvi and 86 include changes made to the text to clarify the emphasis.

Topic: Landowner concerns

Landowners expressed concerns that public access will lead to trespass, impacts to cultural and natural resources, vandalism, theft, and looting, that trail use is not compatible with ranching or farming, and that the plan does not provide adequate resources to address these issues. Landowners also have concerns for their liability.

Comments

- As land managers, we know that undirected and anonymous public access will lead to a number of potential adverse impacts to these land areas. The inability to account for human activities will result in undesirable trail behavior which will lead to compounded problems for landowners that include: the criminal trespassing into adjacent private properties, impacts on the integrity of associated cultural resources (such as modification or destruction of sites) as well as rare and endangered natural resources, vandalism, and theft (or looting). Greater access will require larger community support and more funds by State and Federal agencies towards enforcement and protection. The current plan does not provide adequate resources to address these issues.
- All of our land is leased to agricultural enterprises. I think your management budget is woefully inadequate to cover fencing, signage, and insurance necessary in order to indemnify landowners, farmers, and particularly ranchers. Who will pay for the miles of fencing, and maintenance of that fencing, that will be required to keep livestock separated from hikers? Who will bear the burden of liability on a trail, which is open to the public, and may be potentially unsafe due to underfunded management?

Response: The plan does not propose "undirected and anonymous" public access, but rather, several strategies are proposed pages 42-44 for limiting and evaluating public use. Management actions for disruptions to private property owners are addressed on page 61. Landowner participation in the Ala Kahakai NHT is voluntary. This was stated in the environmental impact statement on a page 186, but was only implied in the plan. For clarity, it is now included in the plan (see Errata for page 50). Agreements for incorporating a trail segment into the Ala Kahakai NHT are always between the NPS and the landowner or land manager (p. 50) and adjacent landowners are included in planning and management teams (p. 51). As the plan states, trail segments will be included in the Ala Kahakai NHT incrementally when there is the staff, funding, and community commitment sufficient to develop and manage each segment according to its resource needs. Fencing may or may not be required and would be decided upon during management planning. For instance, many public trails in the San Francisco Bay Area openly cross fenced cattle pastures but the trails themselves are not fenced. Trail liability is addressed through state recreation laws. In the state of Hawaii, landowners are not liable for recreational use (pages 223-224 of the plan discuss landowner issues).

Comment letter from Hawaii State Parks

- We favor the development of a comprehensive Ahupuaʻa Trail System for the Ala Kahakai National Historic Trail. The challenges we foresee include, but are not limited to the following:

  1. Funding for infrastructure development, including compliance with ADA guidelines;

  2. Agreement with private land owners/ developers and State and County governments;

  3. Camping, especially on private property and culturally sensitive areas;

  4. Security at the starting points where vehicles may be parked for long periods of time and at designated camp sites that may be easily accessible;

  5. Accessibility to medical attention;

6. Illegal commercial activity on government lands; and

7. Issues of carrying capacity.

Response: Approaches to these challenges are discussed in the plan as follows. Funding for the proposed action is discussed on page 98. Agreements with the state, county, and landowners are addressed throughout the document and are a key method of protecting specific sites and segments. According to the resource protection measures described on pages 40-44, camping would not be proposed on private property or in culturally sensitive areas. Security and medical attention would be addressed in specific trail segment agreements. Of course, illegal activity on government lands—county, state, or federal—would not be condoned. The approach to carrying capacity is addressed on pages 58-62.

State Parks is identified as a key partner with the NPS in development of the trail under the proposed action (p.88). The memorandum of understanding between the NPS, the state, and the county of Hawaii will provide the basis for our work together in ensuring that these challenges are addressed appropriately.

Comment

- Please note Queen Emma Land Company's comments numbered below. The common thread to our comments is the actions and responsibilities of the various stakeholders, to natural and man-created events, as guided by the trail management action plan.

1. In natural disasters such as an earthquake, tidal wave, erosion, and fire, what would be the trail management actions immediately prior, during, and after the disaster to protect life and property? If the disaster results in a trail section disappearing in a fully developed area, would a new trail be created in the developed area or would that section of trail cease to exist?

Response: The approach to natural disasters is addressed on the first paragraph on page 48 of the CMP/EIS. Responding to the loss of trail sections due to natural events, as with everything along the trail, will be segment by segment. The plan notes that "the Hawaiian trail system was and will remain dynamic (p. 6)."Depending upon what "fully developed" means, the trail could be rerouted along sidewalks or through parks or other available open space. Any rerouting would follow the management procedures outlined on pages 50-51.

2. What would trail management do should man-created events result in damage to life and property? For example, what actions would the trail management take should people use the trail to access and desecrate caves located off the trail? Who is responsible to repair the cave damage and what would the various stakeholders be able to do to prevent future cave desecration?

Response: After defining a trail segment alignment, management planning will include an inventory of all cultural and natural resources located within the area of potential effect of that segment. Protection measures begin with trail user education on laws, proper behavior on the trail, and the legal consequences if laws are broken. Trail routing, interpretation and promotion can highlight certain features and destinations thereby diverting visitors from sensitive areas and providing a destination which the user would seek (e.g. a great swimming area or a restroom and other amenities). If cave desecration is discovered, the NPS and partners have resources and professionals who can make assessments of the damage based on the resource inventory information gathered during the management planning phase. Cost figures can be determined and a plan to fund or receive assistance for repairs would be developed. The key to prevention of negative impacts on trail resources is education and active management, achieving a level of presence on the trail to effectively enforce laws and regulations.

3. Is there a timetable and benchmarks to achieve the purposes of the management plan? How will the people involved with trail management know if the management plan purposes are being achieved in an efficient manner? Will there be enough flexibility and financial resources to more efficiently achieve the purposes of the management plan?

Response: The CMP/EIS proposes an approximate 15-year plan during which a trail from Kawaihae to Hoʻokena would be completed for public use and other segments and resources protected subject to available funding. Although no metric is suggested in the plan, one would suppose that miles of

Kawaihae Harbor, S. Kohala, NPS photo

trail either completed or protected might be a way to measure progress. Cost estimates and funding sources are suggested, but as the plan states, there is no guarantee that the proposed plan can be implemented within the timeframe.

Comment

- I think you need to actively and directly seek out and engage ALL affected landowners. My suggestion is that you involve them directly in this process, particularly when you are planning a project on their land.

  Response: The plan specifically states on page 51 that adjacent landowners will be included on segment planning and management teams.

Comment

- …does the DCMP/EIS discuss incentives that exist in Hawai'i and/or other states to encourage private landowners to designate historic trails on their property as part of a NHT? P. 88 mentions encouragement of private landowners who have public access requirements in land use approvals to include those easements in the NHT. What would be the possible benefits or disincentives to the landowner? P. 89 says that landowners, etc. "would be encouraged to involve the local community in managing their segment of the trail." Again, what advantages would there be to the landowner or land manager? What kind of liability protection will there be? Without adequate incentives, it seems quite unrealistic to expect landowners to enter into trail management agreements, educate trail users, solicit funds for technical assistance, undertake activities that support the objectives of the NHT, etc. (p. 71).

  Response: Incentives for landowner participation in the Ala Kahakai NHT are discussed on page 188 in the environmental impact statement. These ideas are now also expressed in the plan. See page 50 of the Errata.

Comment

- Bishop Estate seems to be concerned about pillaging of sites, liability, and upkeep. Their current preservation strategy consists of heavy gates across vehicular access points, and signage along the highway warning against the removal of rocks from the area. These signs have been vandalized. We would encourage the Bishop Estate to see the development of these shoreline trails as a wonderful opportunity rather than a burden. We would suggest that, in fulfilling their purpose in executing the will of the Princess, they consider returning to Hawaiian values of place.

  Response: This paragraph is taken from a much longer letter proposing a means by which Bishop Estate could support community-based management of trails on its land. The letter has been forwarded to Bishop Estate.

Comment

- In the long haul, probably the biggest impediment will be gaining access through private land in order to finish the trail. Where possible, after trying reasoning, you should be prepared to use the 1892 Highways legislation to force access where it applies. Beyond that about all you can do is publish where the trail goes and where on whose land you are unable to gain access. Perhaps public pressure will be effective in some cases.

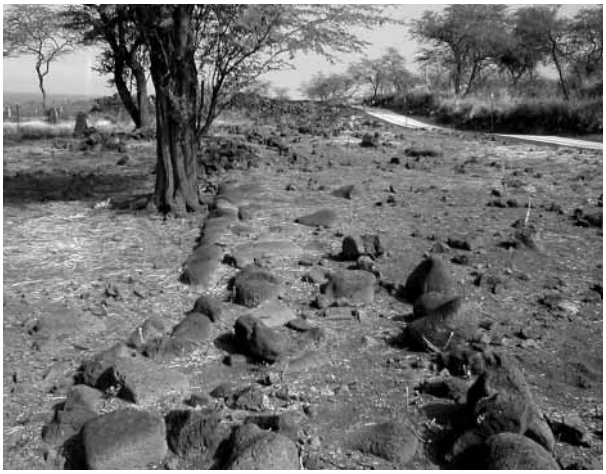
  Response: Influencing landowners through either use of the law or public pressure is not a part of the proposed action or of the NPS approach to trail administration and management. The process of determining state of Hawaii use of the Highways Act of 1892 serves to clarify ownership of a trail segment and therefore should not be viewed as a threat of force but rather as a clarification of title. We plan to work with landowners to help them protect valuable trail segments and resources. We will support the state in its management of those areas over private land that have a quitclaim deed or negotiated access.

Topic: Management Entity

Comments

- Ahupua'a management can lead to conflict if agencies are uninformed. We must conduct responsible research into families. Define what we mean by lineal descendent. Some archeologists and anthropologists are contracted by landowners and hold no validity to communities. [Kohala Intergenerational Center 11/10/2007 Public Meeting]
- We also believe trail management through partnership with local communities and families with traditional ties to the land, is vital. Where families or local community groups cannot be identified, the NPS should partner with other organizations interested in stewardship of the trail.
- The concept of a community-based management model that includes a sustainable, traditional and culturally-sensitive approach to reclaiming of the trail by the local community is also very exciting. While it promises to be challenging at times, this management model is important to community-building.

  Response: The draft MOU contained in this CMP is anticipated to be executed in a timely fashion following approval of this plan. This will provide the basis for NPS, state and county agencies to work together in the implementation of the CMP. We purposely did not refer to family and descendant groups in the CMP as "lineal descendants" since this term is used in other legal forums such as the Burial Council and judicial proceedings related to title claims and could cause confusion in this plan.



Ancient trail remnant, S. Kona, NPS photo

Topic: Coordination with Others

We received several suggestions for coordination with others. The first five statements below are from the identified agencies and each is responded to individually. Others are responded to or simply listed as recommendations since the CMP/EIS states that administration and management will be conducted in collaboration with other agencies and individuals.

Comment from the Environmental Protection Agency

- It appears from the Draft EIS that coordination between government agencies, Native Hawaiian groups, trail organizations, land owners, and other individuals has been ongoing and will continue throughout the life of this plan. In light of the sensitive nature of the watersheds and marine areas in the trail vicinity, we recommend the National Park Service work closely with State and County agencies to ensure protection of these areas during construction or maintenance projects and during operations. The Big Island Soil and Water Conservation District office, County of Hawaii, and Hawaii State Department of Health should be consulted regarding best management practices and appropriate permits for these activities.

  Response: Consultation with The Big Island Soil and Water Conservation District office, County of Hawaii, and Hawaii State Department of Health has been added to the plan to specify this coordination. See page 46 of the Errata.

Comment from the U.S. Coast Guard

- Along the Ala Kahakai NHT Corridor there are approximately thirteen Aids to Navigation. One aid in each of the following locations, Upolu Point, Mahukona, Keahole Point, Keawekaheka Point, Keauhou bay, Hoopuloa, Kamaoa Point, and Honokohau. Two aids in the vicinity of Kailua Bay, and three in the vicinity of Kawaihae. All of the mentioned aids to navigation will need to be accessible at all times by Coast Guard personnel for general maintenance and emergency repairs to ensure the safety of mariners.

  Response: These aids to navigation are now listed in the plan. Errata for pages 73 and 90 reflect these changes.

Comment from the Hawaii State Office of Conservation and Coastal Lands

- Proposed land uses within the Conservation District shall be reviewed by the Department to determine what type of authorization may be required prior to implementation. We request that our Conservation District rules and regulations noted as the Hawaii Administrative Rules, Chapter 13-5 be included in Article II: AUTHORITY of the Draft Memorandum of Understanding located in Appendix F.

  Response: These changes are reflected in the errata for pages 88 and 257.

Comment from the Hawaii State Historic Preservation Division

- …the multiple jurisdictions and management authorities must be well planned and thoroughly thought through in order to avoid conflict or confusion over responsibilities on lands not owned by the National Park Service but potentially administered by them under this plan. As the plan states, consistency in the preservation, development, management and marking of the trail through various jurisdictions will be a challenge. The SHPD awaits further details in this regard and looks forward to the development of an appropriate Memorandum of Understanding with the National Park Service should this alternative be pursued.

  Response: The plan now includes reference to a Memorandum of Understanding with SHPD. See errata for page 42.

Comment from the Hawaii State Department of Transportation

- 1. We understand the path of the trail will need to be further researched and surveyed to determine actual conditions along the trail, path size and alignment/direction for the trail.

  2. Locations where the trail path will or may cross or abut any of the lands, easements or right-of-way under our jurisdiction will need to be identified. Advance consultations with our Department and the respective affected division (airports, harbors and highways) should be done so that any impacts, conditions or requirements of use, and necessary documentations can be addressed. This would include responsibilities for work, construction, and funding of any tasks associated with implementing the path of the trail.

  3. While the possibility of additional locations exist, locations where possible impacts on our transportation facilities could occur are: Kona International Airport at Keahole (KOA), State Route 160 (Ke-ala-o-Keawe Road to the City of Refuge), and Kawaihae Harbor. Specific sites at the airport and harbor will have to be identified and delineated by the National Park Service. The Draft EIS made general statements related to the trail at or around Kawaihae Harbor. Our Harbors staff looks forward to getting clarifications from the National Park Service regarding the trail going through our harbor facility. Our Airports staff noted that the trail might have been affected by construction work of certain portions of KOA Airport.

  4. Since further work and details associated with the trail will need to be done by the National Park Service, we will need to reserve the right to examine, evaluate and comment on these plans by the National Park Service when they relate to locations where the trail affects or enters our facilities.

  Response: Thank you for the information. Since NPS plans to work with all stakeholders on each segment of trail, the Department of Transportation will be consulted on those segments of trail within its jurisdiction. Specific reference to coordination with DOT is included in the Errata page 87. During its current survey of the 15 miles from Kawaihae to ‘Anaeho‘omalu, the NPS will coordinate with the DOT regarding the trail around Kawaihae Harbor.

Comment:

- I urge that the MOUs with the state and county include more than just applications involving the Conservation District and Planning Commission! A system needs to be worked out whereby applications determined to have potential impacts on historic trails within the Ala Kahakai corridor are sent to the Ala Kahakai NHT for review and comment. All of these reviews must be done in a timely manner, and approving agencies and applicants will need clear guidelines on when the Ala Kahakai should be included in the review process. Such applications include: Subdivisions, Special Management Area Assessments and Use Permits, Special Permits, Grading, Project Districts, Rezoning, State Land Use District Boundary Amendments, Leases of State-owned lands, Environmental Assessments,

and Environmental Impact Statements. A few of the forenamed applications require Planning Commission approval, but several of them do not.

Response: This suggestion has been incorporated into the draft MOU. See errata for page 259. Once the MOU is signed by all parties, the NPS will work immediately with the County Planning Department to set up a strategy for addressing notification of all projects that might affect historic trails that could be included in the Ala Kahakai NHT. The suggestion is also incorporated into the body of the plan. See errata for page 88.

Comments

- NPS needs to work with the county on Community Development Plans immediately.
- Planning for the trail should be coordinated with the Hawaii County Planning Department's effort to prepare the Community Development Plans for North and South Kona, South Kohala and North Kohala. Coastal and mauka-makai trails are part of these plans. Please contact County Planning Director Chris Yuen for information on these plans.
- Since the plan includes environmental management measures relating to anchialine pools and nearshore waters such as resource management and water quality monitoring programs, these should be coordinated with the West Hawaii Regional Fishery Management Area, which already has numerous marine protected areas along the coast, as well as the Hawaii County Planning Department and their effort to standardize the water quality monitoring programs along the coast as part of the Special Management Area permits. Please contact Dr. Bill Walsh of DLNR regarding the West Hawaii Regional Fishery Management Area, and County Planning Director Chris Yuen regarding the water quality monitoring programs.
- Ask the County of HI to stop selling segments of trails, territorial roads, and other connections that may help develop this trail. Currently the County continues to try to sell trail segments for pennies. All sales should be suspended until the Ala Kahakai is in the final form.
- Any economic activity relating to the trail should be carefully coordinated with the Hawaii DLNR since much of the trail is in Conservation District, in which there are specific restrictions on commercial activity.
- Explore the state management mechanisms of the state fisher councils. [Tutu's House 11/8/2007 Public Meeting]

Response: Thank you for your suggestions. In response to comments made in letters and public meetings regarding coordination with Community Development Plans, relevant language from this CMP is now incorporated by county planners into the County Community Development Plans being developed for the districts within the trail corridor. Ala Kahakai NHT administration will take into consideration all comments offered at the public meetings and in letters regarding the draft plan in implementing the plan.

Topic: Offers of Support

Comments

- In pursuit of our mission. PATH is willing and able to be a partner in the need to educate the public on the proper use of this trail system. We recognize the significant public demand for access must be properly balance with management and stewardship of the land. If we can be of assistance in this way, please let us know.
- As the CMP states, it is acknowledged that the success of the Initiative rests in the hands of our local communities with support from government and private organizations. Working within a broad range of community interests, the Ala Kahakai Trail Association will play a pivotal role in acquisition and coordination of the delivery of funding support and resources to the NPS and to the many communities involved with trail use and management.
- The management plan clearly states that to make Alternative C come to fruition, a very robust non-profit trail partner will be required. This is a major concern of E Mau Na Ala Hele. We offer our continuing strong support as a trail partner. With our large and interested membership, we feel we have great potential to fill this very critical need.
- Ala Kahakai trails extend throughout Ka'u so you are already aware of these treasures. I would like to lend my voice to all efforts to protect and learn from them. Like me, thousands of people treasure the historic, biological and recreational values of these areas

and support conservation efforts here.

Response: Thank you for your support. Trail administration will need these partners and more in order to accomplish the goals of the plan.

Comment

- Private landowners along the trails, including some of my own clients, such as Jacoby Development at the Kealakehe ahupua`a, and Earl Bakken at the Kiholo ahupuaa, have clearly expressed their interest in participating with the AKNHT system. But, this will require carefully crafted agreements for public access and limiting liability. The trail should not further restrict land use in the parcels through which it passes, since state and county planning systems provide for this land use management.

  Response: Thank you for your support. Management of trail segments will be the result of agreements between landowners or land managers with input from a community management team (as described on page 51of the draft CMP/EIS). Public access will be one issue addressed in these agreements. Trail liability is addressed through state recreation laws. In the state of Hawaii, landowners are not liable for recreational use (as discussed pages 223-224 of the draft CMP/EIS). On other national historic trails, landowners have sought to officially include their trail segments and associated resources in the national trail, thereby relieving them of liability for use of the trail by uninvited users. As noted on page 111 of the draft CMP/EIS, last paragraph, "Land use zoning and permitted uses will not change as a result of any of the alternatives for management of the Ala Kahakai NHT …."

Topic: Inventory

Comments

- Encourage an inventory of all public accesses in existence prior to the 1892 highways act, so these accesses can continue to be owned in fee simple by the state of Hawaii. [Kohala Intergeneration Center 11/10/2007 Comment Sheet]
- The early stages of trail development should include a GPS centerline survey. This should be applied to the core route and all mauka-makai trails as well. There are many benefits to executing this as soon as practical.
  - This will be of great assistance to increase accuracy and meld all subsequent studies.
  - It will more accurately link trail information to existing GIS data bases and other resources.
  - Can automatically generate precise centerline profiles and detailed alignment charts and maps.
  - It will facilitate references to existing property boundaries and adjacent parcel ownership.
  - It will benefit project review and analysis as well as future meets and bounds surveys.

  Response: An updated inventory of public shoreline access is underway by the county. The Ala Kahakai NHT is working with the University of Hawaii in researching maps and other information to assist in locating pre-1892 trails for the entire trail route. A centerline survey is a good idea for the reasons noted; however, given the complexities of locating historic trail segments, this will necessarily be done on a segment by segment basis as trail segments become potential to include in the Ala Kahakai NHT.

Resource Protection

Topic: Impacts of increased public access, especially on cultural resources

Twenty-four separate statements reflected concerns that increased public access enabled by the national trail would have negative effects on sacred and historic Hawaiian sites and other cultural and natural resources, especially in currently remote areas along the trail route, and that management proposals are not adequate to mitigate impacts.

Comments

- Because there are many sacred and historical areas along the coastline (especially where I live in North Kohala) that are remote and not readily accessible, I feel that they are somewhat protected right now. But when the trail opens, that means that strangers and tourists who might not care about the sanctity of an area could be a threat to these sacred sites.
- Trails open up access to larger community and increase impacts on the trail itself (for its informational value of archeological record) as well as adjacent cultural sites (looting, movement of rocks, insensitivity) on other

properties.

- I am particularly concerned with the impacts these actions will have on the remote coastline and resources of Kapalilua, South Kona and Ka‘ū. Past cases have shown that once access is opened to such places, it will be impossible to halt or control.
- While some areas offer recreational opportunities to many people (such as Punalu‘u), the best preserved remain the areas remote from paved roads. Pohue Bay, Waioahukini, Kamilo, Waikapuna and other better-known areas all should be placed under secure protective status.
- I am very concerned about the impact the increased usage of this trail will have on currently remote, fragile, and relatively inaccessible resources (anchialine ponds, ‘opihi, coastal landscapes, wahi kupuna, etc)
- While I support the intention of the National Park Service to protect and preserve the ancient and historic trails within the corridor from increased pressures of population growth and urbanization, I am concerned that the management actions and strategies proposed in the Draft CMP/EIS are not sufficient to mitigate the deleterious impacts of increased access on natural and cultural resources.

Response: The NPS understands and appreciates these concerns. The management proposals in the plan are aimed at preventing the kinds of impacts described in these comments in the following ways. 1) The CMP/EIS is a 15-year planning document that describes a priority area for completing a publicly-accessed, continuous trail that encompasses urban and threatened areas from Kawaihae through Pu‘uhonua o Hōnaunau to Ho‘okena Beach. The more remote areas such as North Kohala, South Kona, and Ka‘ū would be priorities for protection and preservation of trail segments, alignments, and resources, but protected trail sections in these areas would most probably not be opened for public use as part of the Ala Kahakai NHT within this timeframe. 2) The plan states that no section of trail will be opened to public use as part of the Ala Kahakai NHT until adequate inventory and assessment of resources, a management plan and management entity, and a monitoring plan are in place. Each management plan will require additional environmental compliance. 3) Community-based management described on pages 50-51 of the plan provides a means of protecting resources. Trail administration will rely on a network of *kūpuna*, *kama‘āina*, landowners, trail users, agency representatives, organizations, and others to inform it of activities in each district that may threaten potential trail segments or their resources. Administration would act quickly to address threats to all areas of the trail within the limits of the laws and resources available. 4) Although the NPS does not own most of the trail, it can use a variety of methods to protect resources on nonfederal land. These are described on pages 40-44 of the draft CMP/EIS.

Keolonahihi, N. Kona, NPS photo

Comment

- Many of the vast archaeological and environmental resources that have been preserved for centuries have survived due to managed access by landowners. When you interpolate a trail, that does not now exist, publish maps, and invite the public to tour these sites, with an inadequately defined and underfunded management plan for protection of these resources, you put the resources in jeopardy. This, I believe, would be counterproductive to your goals.

Response: Some landowners have protected resources admirably; however, some resources have been damaged despite their management of their land or resulting from their development of it. Protecting resources is not just a matter of keeping the public out, but it requires

knowing what resources are present, evaluating them, and preserving them in place without disturbance from farming, resort, residential or other development. Participation of landowners in the NHT is voluntary.

The plan does not propose to interpolate a trail but rather to identify historic trail segments through methods defined by state and federal law and then to prepare management plans for those trail segments using planning and management teams on which the adjacent landowners would participate. This approach is described in the Resource Protection section of the draft CMP/EIS, pages 40-44 and the Management Approach section, pages 50-51. Trail segments will be available to the public as part of the Ala Kahakai NHT only when adequate planning has been completed and the requisite management and monitoring are in place.

Topic: Natural Resources

Individual comments suggested protection measures for Hawaiian hoary bats and Hawaiian hawks, restoring dryland forests and preserving native trees, standardizing resource management measures for special ecosystems along the trail route, considering the effects of erosion and soil run-off when clearing trails, and using environmentally responsible methods for weed removal.

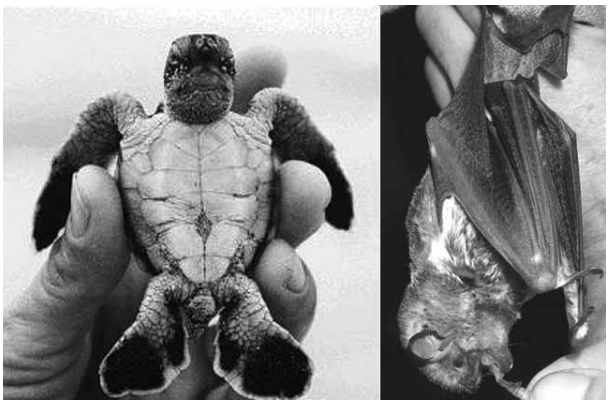
Comment

- 1) Endangered Hawaiian hoary bats (*Lasiurus cinereus semotus*) and endangered Hawaiian hawks (*Buteo solitarius*) nest in both exotic and native woody vegetation. To avoid impacts to the bats, no woody plants suitable for bat roosting should be removed or trimmed during the bat birthing and pup rearing season (April to August). To avoid impacting hawks, brush and tree clearing or trimming should not occur during the hawk nesting and breeding season (March through September), if hawk nests are present. Thus surveys for hawk nests should occur prior to trimming or clearing activities.

  2) If the project involves fencing, the use of barbed wire should be minimized to avoid impacts to bats.

  Response: This information provided by the U.S. Fish and Wildlife Service has been incorporated in the plan. See errata for page 46, column 2.

Comment



Hawksbill turtle and hoary bat, NPS photos.

- Resource management measures for special ecosystems along the trail, such as anchialine pools, dryland coastal forests, rocky shorelines, and beaches, should be standardized and consistent with the DLNR measures already in place.

  Response: The Ala Kahakai NHT plans to include all relevant state agencies including the Division of Forestry and Wildlife, DOCARE, Aquatics, Conservation Lands, etc, in the management planning. The NPS Inventory and Monitoring Program team will be consulted to assure that natural resource monitoring protocols are consistent.

Comment

- I was alarmed when you said [at the Kapa‘au public meeting] that when working with the community to clear portions of the Ala Kahakai Trail (in the Kona area I believe) you were providing them with poison to kill the plants. I am hoping these people know the difference between native and non-native plants. In any case, even if the plants are invasive, I feel that it is environmentally irresponsible to apply poison to a trail so close to the ocean. It could potentially damage our reefs and contaminate the groundwater. In an ecosystem as fragile as the Hawaiian Islands, there is no place for synthetic herbicides. Please consider clearing the trail in a more environmentally responsible way.

  Response: The Ala Kahakai NHT is working with communities on clearing certain state- or NPS-owned trails and applies the same state and federal environmental and historic preservation compliance standards that are used within the national parks. Community

managers will be offered training on safety and best management practices including the proper and environmentally safe approaches to invasive plant management. We agree that the use of pesticides and herbicides should be limited as much as possible.

Comment

- I am also concerned about over-gathering. As our coastlines become more accessible by this trail, I'm worried that people will be tempted to gather too much fish, opihi, limu, rocks, etc., from these areas. Is there room in your plan to hire workers to monitor the amount of natural resources being taken from the area? Maybe you could work with the DLNR and/ or community volunteers to facilitate this.

  Response: Marine resources related to traditional coastal harvesting are addressed on page 46 of the Draft CMP/EIS. Actions recommended are consulting local fishers and gatherers, assembling baseline data, developing a monitoring program, collecting ethnographic data, and encouraging appropriate activities through interpretive media and informational materials. The errata for page 46 cites additional actions recommended and incorporated into the proposed action.

Comment

- Please also consider the effects of erosion and soil run-off when clearing the trails

  Response: Although an unstated value of the National Park Service, prevention of erosion and runoff are now specifically mentioned in the plan. See page 46, Watersheds and Marine Areas, in the Errata section.

Comment

- Also remember that the coastal and dryland forest areas are almost gone. Please try to preserve what is left. If there are endemic and/ or native trees on the trail, consider moving the trail if possible.

  Response: Native plant communities, including dry forest, are discussed on page 45 of the plan. In general, invasive (non-native) species would be removed from the trail tread, as possible. New construction would be located to avoid trampling or removal of native plants. See errata for page 45 in which "removal of native plants" has been added.

Topic: Native Hawaiian User and Uses

Comment

- I am writing this on behalf of my family, ancestors and all that we have talked about of the controversy surrounding the Ala Kahakai "fictitious" trail that does not exist in the history of my ancestors. [My family has] written protests against this "make-believe" trail that is more insulting to Native families that know this is more damaging to the true history and protection of sites belonging to Hawaiians that lived and died in places next to this proposed "fictitious trail." Historical fact cannot be revised as a matter of convenience to change what really is the truth. Whether it be the sacred heiau, burial, kapu laws and more, the fact is the Ala Kahakai doesn't exist as the proof is because of the old Kapu laws that forbid the free travel from ahupua'a. Under penalty of death, to go into another ahupua'a was unheard of unless there was specific permission given by each chief because no one would want others to come into their places to take kalo, manini, akule, limu, etc.

  Response: The plan immediately notes that the trail name "Ala Kahakai" was used by a planner in 1973 to describe a "trail by the sea" (p. iii; p. 14) that includes the prehistoric and historic shoreline *ala loa* and other trails on or parallel to the shoreline. While the name of the trail was coined, the segments of which it is comprised are real prehistoric and historic trails or routes: "The Ala Kahakai NHT combines surviving elements of the ancient *ala loa* with segments of later *alanui aupuni*, which developed on or parallel to the traditional routes, and more recent pathways and roads that created links between the historic segments" (p. xi). While it was generally true that travel occurred within the *ahupua'a*, it is also true that travel around the island was ensured by Kingdom laws that allow for free travel on trails. These laws were incorporated into state laws. Page 6 of the draft CMP/EIS, notes the limits of access to resources, field plots, and house lots, stating "Travelers, thus, could pass through *ahupua'a* on the *ala loa*, which circumscribed the entire island, but they did not have open access to the resources of the *ahupua'a*."

Comment

- I am also concerned about the impact that increased malihini [one unfamiliar with a place or custom] access and usage will have on the

local and Hawaiian folks that currently utilize resources and practice in these areas.

- Sacred ceremony such as that which occurs at sacred sites should not be forced to be open to those who are there only in curiosity. I am a Kahu of Keolonahihi which is part of Kaluaokalani and the care of that area will not follow a national park plan, it will follow the traditional plan determined by those people who have inherited the care of this place. "Pono" is the condition that will guide the outcomes.

  Response: As stated in the plan, "The goal of the trail protection program in alternative C, the proposed action, is the preservation of cultural features and landscapes that sustain the practice of Hawaiian Values" (p. 90). The entire protection program is outlined on pages 90-91. As each segment of trail is planned, traditional users will sit on or advise the planning and management team "to assure resource protection and sustainability, access timing and other protocols" (p. 91). In addition, page 59 recognizes the potential for impacts on Native Hawaiian use of the trail and their ability to practice their cultural traditions and page 60 describes potential actions that might be taken to avoid or minimize the impacts.

- One of the problems you will encounter is access to "cultural" sites. As was brought up at the hearing, Polynesian Hawaiians will be very concerned about this and can be expected to oppose building the trail near at least some of these sites. Although these sites could be a valuable educational venue, if opposition occurs, in the interest of making progress, you should just relocate the trail away from close proximity to these sites. Otherwise, you will just get bogged down.

  Response: The plan allows for "strategic routing of the trail" as a means of protecting sensitive natural and cultural areas (p. 44).

- You stated that you intend to use ohana kuleana as a basis for setting up and managing the trail. I think that could work if the goals and interests of the ohana are compatible with the needs of the trail and the multitude of interests of the public at large. In one case for example, an ohana has done a wonderful job (with a lot of help from the community at large) in clearing out Kamoa Point. But there is now a real effort to keep non ohana people out even though it is state land - they appear to want to use it only themselves.

  Response: The ohana clearing vegetation and caring for Kamoa Point is implementing a State Parks management plan for the area which includes managing access due to the sensitive nature of the site. Public involvement in the activities of this ohana is inclusive of all ethnicities and includes the international community as well.

Trail User Experience

Topic: Trail on the Ground

Eight comments specifically mentioned getting trail on the ground, marked, and interpreted as the Ala Kahakai NHT as a priority.

Comments

- I urge you - you must, as soon as is possible, show some progress on the ground. Focusing on the Puukohala - Hookena stretch, do some signage and upgrade some of the trail areas that already exist, declare victory, have a big grand opening and make it a press and politician event. You will gain support locally and this will lead to budgetary and other support nationally.

- We hope this process can move forward expeditiously so there will be feet on the ground on approved and accessible trail sections as soon as possible. We urge the timely preparation of infrastructure necessary to open the planned 15-year targeted area of Kawaihae to Pu'uhonua o Honaunau.

- Make a successful trail [segment] that will encourage others to follow. Have a map. Mark the trail. [comment at Tutu's House 11/8/2007 public meeting]

- We also want to emphasize that with the significant timeline it is important to open smaller sections of trail for people to access.

  Response: Existing segments located in the priority area of the CMP are now available to the public. These include the 15-mile state of Hawaii's Ala Kahakai Trail and segments of shoreline and near shoreline trails currently being managed at the three NPS units in West Hawaii. NPS trail administration has targeted the state of Hawaii's Ala Kahakai Trail as the first trail segment, outside of the existing NPS units,

to be consistently marked and interpreted as the Ala Kahakai National Historic Trail.

Topic: Trail Use

Comments concerned keeping the trail for walking only and making the Auto Route accessible for bicyclists.

Comments

- Development of the Auto Route and access points should also readily accommodate access for bicyclists, as well.
- The proposed Auto Route should also include bicycling accommodations as an alternative to the automobile.
- Keep the trail free of vehicular access. Anything on wheels especially when propelled by noxious fuels can only advance the destruction of a beautiful historic trail. Let's keep it to foot traffic only.

  Response: Thank you for your comments. The auto route is a separate route that uses pre-existing roads to connect key trail resources. Trail use is described for walkers only in the trail prescriptions pages 52-55 of the plan. Trail administration will take into consideration promoting bicycle use along the auto route as feasible and practical.

Topic: Trail User Capacity

Comments

- To the final indicator on page 61, we suggest that scheduling visits by large groups may help with crowding around important sites along the trail. Tour companies could voluntarily work with the park staff to schedule tour buses along the auto tour route or the park rules could require companies to schedule bus tours. Both the Arizona memorial and Hanauma Bay Nature Preserve require some form of group scheduling.
- In the list indicators of user capacity is the number of fires along the trails and the number of injuries. As more people hike the trails, the likelihood of more fires started by accident and more people getting injured could be indicators of over use.

  Response: These suggestions have been incorporated into the plan. See both references to page 61 in the Errata section.

Comment

- Overcrowding by outsiders will affect the local communities' ability to "recharge." [Kohala Intergenerational Center 11/10/2007 Public Meeting]

  Response: An approach to user capacity to avoid issues of overcrowding and diminution of the user experience is addressed on pages 58-62 of the plan.

Trail Clearing, Kealakehe HighSchool, O'oma, N. Kona, NPS photo

Topic: Education

Comment

- Identify trail by era of development prior to 1778, 1882-1892, after 1892. Could use a background color to depict each era. Cultural features should be indicated in the same way. [Kohala Intergenerational Center 11/10/2007 Comment Sheet]

  Response: Comment noted. Ideas such as these can be included in the proposed sign plan for the trail.

Comment

- An additional aspect of the trail we feel should not be overlooked is the history of other ethnic immigrant groups such as the Japanese, Chinese, Portuguese, Koreans, Puerto Ricans, and Filipinos as well as explorers, missionaries, whalers, and others who have contributed to the rich history of Hawaii. Their stories, too, are important at different places along the trail, and, where applicable, should be recorded and celebrated.

  Response: Comment noted.

Comment

- Standardized signage and interpretive programs should be developed and shared with the landowners along the route so that there is a consistent system used throughout the trail system.

  Response: Use of the trail marker and development of a sign plan are addressed on page 63 of the plan. Some examples of possible signs are offered in Appendix E, pages 253-255. As they are developed, the sign plan and interpretive materials will be shared with landowners along the route as appropriate.

Topic: Recreation

Comment

- I do note that the discussion of Alternative C focuses mainly on the preservation and enhancement of cultural sites. There is nothing wrong with that, but you must keep in mind that the broader community is going to be more interested in the trail as a historical, educational, and recreational venue - don't forget us.

  Response: Aside from preservation of historic trail fabric and routes, national trail administration is specifically charged through the National Trails System Act to recognize the educational and recreational value of the historic trail (See the footnote on page 2 of the final plan.). The 15-year planning period includes the goal of completion of a publicly accessible trail from Kawaihae to Hoʻokena that is well-marked and its historic and cultural value interpreted.

Comment

- There are people who would like to walk the entire trail. The area between Anaehoʻomalu to Spencer Beach offers little to no camping. To make the trail user friendly to people that want to walk its length over a period of day or weeks there needs to be designated campsites every few miles. There needs to be more camping available in North/South Kohala. Presently, the only camping available is these areas are Spencer Beach Park, Mahukona, Kapaʻa. [Tutu's House 11/8/2007 Comment Sheet]

  Response: The plan recognizes the need for campsites: "As sufficient continuous trail is managed and marked, strategically place campsites and water sources would accommodate long-distance hiking. (p. 91)" Cost estimates for the trail from Kawaihae to Hoʻokena are based on having four walk-in campsites. Two approved campsites exist within this area at Spencer Beach and Hoʻokena. Hapuna Beach State Park also offers cabins for camping. The cost estimates include adding two more, although the sites for these are not yet selected.

Facility Development

Topic: Facilities

Comment

- One component of the development plan that has not been fully addressed is the availability of adequate facilities for the development, management and operation of the trail system. A consolidated headquarters (possibly in the area of Kaloko-Honokohau) that could house all needed National Parks Service functions for the trail, as well as other NPS facilities on the island. Such a facility could also accommodate the State Department of Natural Resources (specifically the Division of Forestry and Wildlife, Historic Preservation Division, Division of State Parks, and perhaps even the Divisions of Aquatic resources and Boating and Ocean Recreation.

Space could also be made available for the County Department of Parks and Recreation. This would create a single complex that could more closely link all levels of government that will be involved in the trail development, as well as the operation and maintenance of related facilities. Communal space for meeting and resource sharing could also be arranged for community based organizations involved in trail development such as E Mau Na Ala Hele and People's Advocacy for Trails Hawai'i (PATH). The unifying effect from all of the applicable resources would create a unique opportunity in the future development of the trail.

Response: Comment noted.

Comment

- When do you envision that the West Hawaii Parks Museum will be built, designated or otherwise implemented? Do you foresee the National Park Service as the prime mover to get the facility built? Are you contemplating involving commercial firms as part of a partnership?

  Response: The museum is currently listed in the 2012 Line Item Construction program as part of the NPS Five Year Plan published in FY 2009. While the NPS recognizes the need for a facility for proper preservation, management, and access to cultural collections on the island of Hawaii, it also recognizes the need for the support of other state and non-governmental groups. The NPS is working with all interested parties to preserve and make available to Native Hawaiians native culture on its island of origin.

Trail Operations

Several commenters felt that funding, staff, and budget were inadequate to the tasks outlined in the plan. Some wondered what the NPS would do in the event that fund raising by community-based organizations, especially the Ala Kahakai Trail Association, falls short of expectations.

Topic: Staff

Comment

- I believe a Law Enforcement/Interpretive Ranger should be "Core Staff' for Alternative B as well as for Alternative C.

  Response: The Law Enforcement/Interpretive Ranger position was included in alternative C because the NPS has the potential to actually manage trail segments under that alternative. Page 96 of the plan states, "A law enforcement/interpretive ranger would be added in the event that the NPS takes over management of a significant number of state-owned trail segments." Under alternative B, the law enforcement function would be filled by state rangers or other law officers.

Comment

- P. 87 offers NPS assistance in reviewing land title records (a significant need when determining ownership status of historic trails), but Land Title Researcher/Abstractor does not appear on the "Other Needed Disciplines" list for Alternatives B and C.

  Response: The oversight is corrected in the final plan. See pages 78 and 96 in the Errata section.

Comment

- More access needs more protection and enforcement. 4-5 staff is not enough for half the island. [Kona Outdoor Circle 11/5/2007 Comment Sheet]

  Response: The plan projects the need for five full-time staff and nine other part-time staff positions that would be needed to fulfill the goals of the approximately 15-year planning period. During that time, the NPS will have oversight responsibility for the entire trail, but the focus for planning, management, interpretation, marking, and thus for staff time, would be the trail from Kawaihae to Hoʻokena. The NPS staff would work to protect and preserve historic trails outside of the priority area that might be included as part of the Ala Kahakai NHT, but these most likely would not be managed for public access during the period projected for this plan.

Topic: Costs

Comment

- The estimate for the cost of developing two campsites (p. 97) seems low, considering the State Division of Forestry & Wildlife's cost-estimate for one composting toilet (including unit, shipping, transportation to site by helicopter, labor) in 2001 was $14,000 - $16,000.

  Response: The two campsites estimated are considered to be walk-in sites related to trailheads, the costs for which (road improvements, parking, etc.) are not included

in the campsite costs. Costs for campsites were estimated as follows: clearing and grubbing @$4,000 each, a catchment system for gray water uses @$5,000 each, and a large, handicapped accessible composting toilet @ $75,000 each. Nā Ala Hele staff provided the cost estimate for the composting toilet.

Comment

- Is the cost of installing water catchment systems included somewhere in the One-Time Costs?

  Response: As noted above, the costs for gray water catchment are included. Due to the dryness of the west side of the island, catchment for drinking water would not be feasible. Hikers would be expected to carry drinking water or water could be provided in another manner.

Topic: Funding

Comment

- Our concern is that this is also the most expensive alternative and we wonder whether sufficient funds will be available to implement this alternative. We note that part of the funding effort will include monies raised by community-based organizations. Many community-based organizations are capable of raising large sums of money in support of public facilities, the Friends of Public Television and Friends of Waikiki Aquarium are just two examples. There is no guarantee that sufficient funds will be raised to fully implement the plan described in Alternative C. We wonder what the Park Service will do in the event that fund raising efforts fall short of expectations.

  Response: The plan notes in several places that funding and staffing may not be forthcoming and that implementation of the plan could by many years in the future. The NPS will take an incremental approach to implementation of the plan so that only those segments of trail for which there are funds and management capacity will become official parts of the Ala Kahakai NHT.

Comment

- Funding for the trail and all its associated resource management and interpretive programs should come from the federal government. This will supplement the existing (but entirely inadequate) state funding.

  Response: The federal government is committed to funding the Ala Kahakai NHT, along with all national trails. In fact, base funds for the Ala Kahakai NHT have been increased this year to $420,000 from $260,000. But as with all national trails, there is the expectation that there will be significant participation from partners in terms of volunteer hours, donations in kind, and fundraising.

Topic: Planning

Comment

- It is not clear from the narrative in this section

Trail at Pu‘uhonua O Honaunau, NPS photo

Holua Slide, Keauhou, NPS photo

how the community was involved in developing the community vision. Was there a series of meetings with the community or did it occur only at one time during the scoping process?

Response: The community vision was originally developed during the public involvement process of the *Feasibility Study* (1998) for the Ala Kahakai that resulted in the trail's authorization as a national historic trail. This vision was then further developed during the scoping process for the comprehensive management plan and presented as a poster during the alternatives development public meetings.

Comment

- How long do you estimate it will take to research the trail and surrounding areas? Do you foresee the information being obtained within the life span of the management or is this a long-term project that may be completed at some time in the distant future?

  Response: We anticipate that researching the entire trail and surrounding areas will continue when the plan is updated. The proposed action recommends completing research on the trail and immediately surrounding areas from Kawaihae to Hoʻokena and other areas to be targeted outside of the priority area.

Community meeting, NPS photo

Alternatives

Three landowners and one botanist preferred Alternative D: Historic Trail Clusters and a fourth landowner preferred either alternative D or failing that, Alternative A: No Action. They argued that developing non-historic connector trails to tie together historic segments is not historically accurate.

Comments

- Alternative D: "Historic Trail Clusters" calls for the restoration and certification of authentic historic trail segments only. This alternative does not include the construction of non-historic connector trails that would result in a continuous coastal trail. This option honors and protects actual historical trail segments built by our ancestors and supports the continued local usage of trail clusters by living descendents. We feel this option would help discourage irresponsible behavior associated with unaccounted transient movement from one area to another.
- I ask you to reconsider the option of Alternative D: Historic Trail Clusters, as proposed in the 2004 Management Plan/EIS Planning Update http://www.nps.gov/alkaJupload/ACF23FD.pdf (see page 11), which calls for the restoration and certification of authentic historic trail segments only. This alternative does not include the construction of non-historic connector trails that would result in a continuous coastal trail. This option honors and protects actual historical trail segments, and supports continued local usage of trail clusters, while not creating the malihini attraction of a continuous coastal trail.
- The project is designated as a National Historic Trail. The definition of historic implies that the trail exists or has existed in history. While it is documented that this trail does, or did, exist in many places, the trail corridor you have outlined in the Draft Management Plan does not accurately follow the existing trail. It is misleading to designate a Historic trail corridor that is interpolated and does not follow the documented or physical trail alignment. If we are to preserve a Historic trail, it should follow the trail as it exists, or existed, on the ground and should be- supported by historical documents and field surveys

  Response: The CMP/EIS eliminated alternative D from further consideration because 1) it had been considered and rejected in the *Feasibility*

Study for the trail, 2) Congress had designated a continuous linear trail, and 3) the public did not support it as a stand-alone alternative, suggesting that historic segments are a place to start to develop a continuous trail. The plan calls for the interpretation of modern connector trails as such.

Comment

- Protection of the 80-mile trail against the traffic that it is likely to generate after it is developed with picnic tables, toilets, camping areas, interpretation, signage, parking, shelters and other development would be impossible with the tiny budget alternatives that the Plan projects. Furthermore, the Plan calls for financial participation of the community. Kau and much of the Big Island is economically depressed with no prospect for employment opportunities or change in this status. Local community funds for protection of the resource cannot be forthcoming in the foreseeable future. The Department of Interior's reluctance to fund adequately the parks already in the system clearly indicates that this unit will not get the future funding it needs. Until there is a viable plan for the present and reason to believe that future Park needs in the system will be funded so that they can be preserved for posterity, Alternative A is the only reasonable course that can presently be taken.

  Response: Alternative A could be considered the starting point of the plan as it describes what the trail might become with a static budget. The proposed action anticipates that these conditions will change over time with increases in federal funding and partner capacity. The proposed action has a broader vision than simply maintaining current conditions and will be implemented incrementally as segments of trail become official parts of the national trail and specific management plans are in place. Since the draft plan was released for comment, the NPS base budget for the Ala Kahakai NHT has been increased to $420,000 by the U.S. Congress, already allowing for staff hiring and other support for the proposed action. Budget increases for all of the national trails are due in large part to the advocacy of the Partnership for the National Trails of which both the Ala Kahakai Trail Association and Ē Mau Nā Ala Hele are a part.

Environmental Impact Statement

Comment

- The EIS needs to address:
  - Archeological protection is major concern
  - Coastal harvesting [section of the EIS] is woefully lacking
  - "Education is expected to encourage appropriate activities" is inadequate
  - Fishing resources need to be protected; talk about impact of visitors on local fishing.

  [Kohala Intergenerational Center 11/10/2007 Public Meeting]

  Response: With or without the Ala Kahakai NHT, archeological protection is a major concern on Hawai'i Island. The plan incorporates a variety of protection measures that might be used to protect archeological sites (pp. 40-44). Education is but one of the protections for traditional coastal harvesting. Protection measures discussed in the plan (p. 46) include developing baseline data, including fishers and gatherers in trail planning to provide recommendations for fishery protection and sustainable gathering, and monitoring to determine impacts as well as using interpretive media and informational materials to encourage appropriate activities. After listening to concerns at the Kapa'au public meeting in particular, we have strengthened the language in the plan regarding protections of traditional coastal harvesting resources. See page 46, column 1, of the Errata section. See also, page 166 of the Errata section for changes to the EIS.

Comment

- Impacts of increased public access into remote areas of South Kona and Ka'ū are not adequately addressed by the current plan: impacts to natural and cultural resources; impacts to cultural practice and cultural practitioners.

  Response: The proposed action offers procedures and processes to protect natural and cultural resources and impacts to cultural practice and cultural practitioners on pages 40-46 and pages 90-91. The NPS believes that, if these procedures are followed, resources and cultural traditions as related to the Ala Kahakai NHT will be adequately protected.

Suggestions for Editorial Corrections Not Changed in the Final Plan

- Page 97, first paragraph

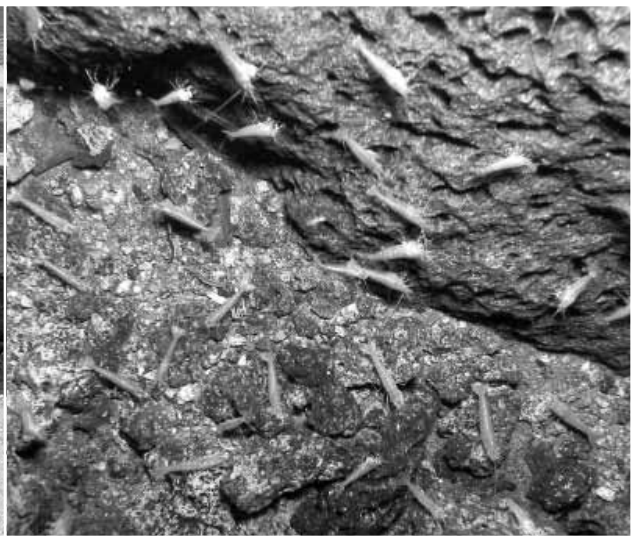
  "Within the 73 mile sections of trail, Na Ala Hele ~~owns 21 miles~~ has documented that approximately 21 miles may be subject to the Highways Act and qualify as state owned. ***However, this mileage data conflicts with the 35 miles referred to in the Feasibility Study and previously mentioned on page 12.***

  Response: The state trail mileage given here refers to mileage within the priority zone (21 miles). The mileage mentioned on page 12 refers to state trail mileage within the entire 175-mile corridor (35 miles).

- We would like to amend the alignment of the trail as shown on the working map dated 12/21/06 on page 101 in this area to reflect the existence of prehistoric and historic trails along the shoreline in the corridor area. The current map shows only the Auto Tour Route in red, which is the current paved government road between Kealakekua Bay and Honaunau Bay. The alignment of the trail needs to be amended to include both the shoreline trails, type A or prehistoric (circa 1750) and type AB (1820-1840) for foot and horse traffic as documented in Trails: From Steppingstones to Kerbstones by Russell A. Apple (Bishop Museum Press, 1965). The current working map on page 101 of your report shows only the historic cart trail, type B, which in modern times has been paved by the government and is the current "Auto Tour Route." Diana Keffer, Dennis Hart, Roy Santana

  Response: The map on page 101 shows historic trails in Nā Ala Hele jurisdiction between Kealakekua Bay and the Mokuʻohai Battleground site as well as another possible lateral trail and another trail in the Nā ala Hele inventory. Although footpaths may exist between Mokuʻohai Battleground Hōnaunau Bay, our data bases did not reveal them. Should you have accurate maps showing type A trails within this area, please share them with trail administration. The plan maps provide only a starting point for developing a Geographic Information System database for the entire trail and will be augmented over time as we get more accurate and detailed information.

Kaʻawaloa Road, S. Kona, NPS photo



Copies of Comment Letters

Section 4:Copies of Agency, Organization, and Individual Comment Letters

All letters from federal, state, and local agencies and organizations are included in full on the following pages. All other substantive comments from individuals, both written and offered at public meetings, are quoted and responded to in Section 3 of this document. Of the 20 letters, emails, and PEPC comments received from individuals, a representative sample of four letters is included. These letters convey the range of the concerns expressed by the public in written form. All public comment, both in the form of letters and of meeting flip charts, are part of the administrative record of the plan which will be available to the public after the Record of Decision is signed.

The letters included are as follows:

Federal

Environmental Protection Agency
U.S. Coast Guard
USFWS

State

Na Ala Hele Trails and Access Program
State Historic Preservation Division
Division of State Parks
Office of Conservation and Coastal Lands
Department of Transportation

County

Hawaii County Council, County of Hawaii (Bob Jacobson)

Organizations

Ala Kahakai Trail Association (Roy Broggini)
E Mau Na Ala Hele (Barbara Schaffer)
Historic Hawaii Foundation (Kiersten Faulkner)
Hoʻokuleana LLC [Oʻoma Development] (Peter T. Young)
Kamehameha Schools (Kehuewa Kikoloi)
Kaʻū Farm and Ranch Company (Chris Manfredi)
Kūlana Huli Honua (Mikahala Roy)
Peoples Advocacy for Trails Hawaiʻi—PATH (Laura Dierenfield)
Queen Emma Land Company (Stuart Lau)
University of Hawaii Environmental Center (Peter Rappa)
Wailea Property Owner's Association (William T. White III)

Individual

Deborah L. Chang
Benjamin Konshak
David Tarnas
Amber Nakamura Whitehead

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 21, 2007

Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, HI 96740

Subject: Draft Environmental Impact Statement (EIS)/Comprehensive Management Plan for the Ala Kahakai National Historic Trail, County of Hawaii, Hawaii [CEQ #20070437]

Dear Sir or Madam:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

The Draft EIS evaluates alternatives for administering, preserving, protecting, developing, managing, and maintaining the 175-mile Ala Kahakai trail over the next 15 years. EPA has no objections to this project and has, therefore, rated this Draft EIS as LO – Lack of Objections (see enclosed "Summary of Rating Definitions"). It appears from the Draft EIS that coordination between government agencies, Native Hawaiian groups, trail organizations, land owners, and other individuals has been ongoing and will continue throughout the life of this plan. In light of the sensitive nature of the watersheds and marine areas in the trail vicinity, we recommend the National Park Service work closely with State and County agencies to ensure protection of these areas during construction or maintenance projects and during operations. The Big Island Soil and Water Conservation District office, County of Hawaii, and Hawaii State Department of Health should be consulted regarding best management practices and appropriate permits for these activities.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is officially filed with our Washington, D.C., office. If you have any

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questions, please call me at (415) 972-3846, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

Nova Blazej, Manager
Environmental Review Office

002081

Enclosure: Summary of Rating Definitions

U.S. Department of Homeland Security
United States Coast Guard

Commander
Fourteenth Coast Guard District

PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850
Staff Symbol: dl
Phone: (808) 541-2320
Fax: (808) 541-2309

16500

NOV 27

Superintendent, Ala Kahakai NHT
73-4786 Kanalani Street, #14
Kailua-Kona HI, 96740

Dear Aric Arakaki:

Along the Ala Kahakai NHT Corridor there are approximately thirteen Aids to Navigation. One aid in each of the following locations, Upolu Point, Mahukona, Keahole Point, Keawekaheka Point, Keauhou bay, Hoopuloa, Kamaoa Point, and Honokohau. Two aids in the vicinity of Kailua Bay, and three in the vicinity of Kawaihae. All of the mentioned aids to navigation will need to be accessible at all times by Coast Guard personnel for general maintenance and emergency repairs to ensure the safety of mariners.

Sincerely,

D. V. SHEPARDSON
Chief Waterway Management Branch
U.S. Coast Guard
By direction

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850

FEB 12 2008

In Reply Refer To:
2008-TA-0102

Mr. Aric Arakaki
Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, Hawaii 96740

Subject: Comments on the Draft Comprehensive Management Plan and Environmental Impact Statement for the Ala Kahakai National Historic Trail on the Island of Hawaii

Dear Mr. Arakaki,

The U. S. Fish and Wildlife Service reviewed Draft Comprehensive Management Plan and Environmental Impact Statement (EIS) for the Ala Kahakai National Historic Trail. This draft plan presents proposed management alternatives for the 175-mile corridor along the western and southeastern shorelines of Hawaii Island. We have reviewed pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program and the Hawaii Geographic Analysis Program.

This Draft Management Plan and EIS are well written and comprehensive. We agree with your conclusions, this project is not likely to have a negative impact on listed species and there is much potential for positive impacts to native ecosystems and listed species. To assist you in avoiding negative to listed species, below are a couple of suggestions that may be useful when planning the project.

1) Endangered Hawaiian Hoary bats (*Lasiurus cinereus semotus*) and endangered Hawaiian hawks (*Buteo solitarius*) nest in both exotic and native woody vegetation. To avoid impacts to the bats, no woody plants suitable for bat roosting should be removed or trimmed during the bat birthing and pup rearing season (April to August). To avoid impacting hawks, brush and tree clearing or trimming should not occur during the hawk nesting and breeding season (March through September), if hawk nets are present. Thus surveys for hawk nests should occur prior to trimming or clearing activities.

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2) If the project involves fencing, the use of barbed wire should be minimized to avoid impacts to bats.

We hope this information is useful for completing the Management Plan and EIS. If you have questions, please contact Dr. Jeff Zimpfer, Consultation and Technical Assistance Program (phone: 808/792-9431; fax: 808/792-9581).

Sincerely,

Russell R. Holden for

Patrick Leonard
Field Supervisor

Department of Land and Natural Resources
Division of Forestry and Wildlife
Na Ala Hele Trail and Access Program
www.hawaiitrails.org

Mr. Aric Arakaki, Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani Street #14
Kailua-Kona, HI. 96740

December 20, 2007

Subject: Division of Forestry and Wildlife – Na Ala Hele Trail and Access Program; Comments on the Draft Ala Kahakai National Historic Trail Comprehensive Management Plan and Environmental Impact Statement (DCMPEIS)

Aloha Mr. ~~Arakaki~~: ARIC

Na Ala Hele deeply appreciates the effort put forth by NPS on the DCMPEIS and offers the following comments. For clarification purposes, I have underlined proposed revised language and have struck-out language suggested for deletion. I have italicized relevant comments. I commend NPS on the design of the Ala Kahakai logo – in my opinion the image captures the spirit of the coastal ala loa concept, and is very clear and attractive for signage to designate authorized trails.

1. Page 12, Effects of the Highways Act of 1892 (Chapter 264-1 HRS) on the Ala Kahakai NHT

This section needs further clarification:

"However, the research used to document the claim by the ~~government~~ state may be legally challenged for a variety of reasons if the claim is adverse to the landowner. The trail ownership may ultimately be adjudicated in court. Until such time that a Quitclaim Deed is executed between the state and the adjacent private landowner, and it is recorded with the Bureau of Conveyances, the title to a specific trail feature may be subject to challenge over time by future landowners.

~~Opening~~ Restoring managed public access to a ~~state trail to the public~~ trail that has been confirmed to be state owned via a Quitclaim Deed or access has been negotiated through other forms of documentation, may requires a cultural survey and potential preservation or re-construction, management, maintenance, and vehicular access & parking and signage plans that consider the perpetual commitment of staff time and funding resources."

~~If resources are lacking to open them to public use, often the trails may be "land banked" that is held by the state without a management entity and not open to the public.~~ In most cases for these segments of coastal ala loa, there is currently insufficient state staff and funding for the pertinent planning and management, therefore the abstract data collected by NAH is documented on a data base and, if a trail cooridoor or ala loa is still physically intact, may remain subject to unmanaged public use based on its location and relevant function relating to access.

"The Feasibility Study identified 35 miles of ~~potential state trail~~ trails that have been identified as being subject to the Highways Act, cross~~ing~~ private lands and may be eligible ~~for inclusion as part~~ to include as ~~part~~ authorized segments of the Ala Kahakai NHT.

2. Page 33, *reference to Chapter 198D, HRS and Na Ala Hele policy on incorporating a trail into the legal jurisdiction of Na Ala Hele. Recommend revised language:*

~~"Trails included in the Na Aka Hele system must be determined to have a functional value to be included in the system"~~

"Currently, trails that are determined to have value for managed public access in a manner that would not inadvertently jeopardize sensitive cultural features and there is a capacity for management by either Program staff or through an agreement with a private landowner, may be added to the legal jurisdiction of the Program and subject to Chapter 13-130, Hawaii Administrative Rules"

3. Page 73, second paragraph - Trail Alignment

"Some of these segments are land-banked, ~~with the Department of Land and Natural Resources~~ via documentation that may include, but is not limited to, both the NAH Abstract data base, documents filed with the Historic Preservation Division, or approved Conservation District Use Applications, may technically be considered under the jurisdiction of the Land Division. The jurisdiction is challenged affected private landowner disputes the claim of state ownership and there is pending litigation. These features would remain in this condition until such time as either the NPS or NAH has resolved the ownership issue and has the capacity to manage them.

4. Page 97, first paragraph

"Within the 73 mile sections of trail, Na Ala Hele ~~owns 21 miles~~ has documented that approximately 21 miles bay be subject to the Highways Act and qualify as state owned. ***However, this mileage data conflicts with the 35 miles referred to in the Feasibility Study and previously mentioned on page 12.***

5. Page 192, Cumulative Impacts

"NPS management of confirmed state owned segments of trail could have long-term beneficial effects ~~on trail managmnet and~~ on the ~~relationship between Na Ala Hele and the NPS.~~ ability of both the state and the NPS to preserve and sustain ably manage intact segments of ala loa throughout the Big Island.

6. Page 206, Appendices – Appendix A: Relevant Legislation

In addition to HRS Chapters 520, 198D and 343, please add the additional HRS sections we had previously included in the Draft MOU as having application to regulatory aspects of Ala Kahakai NHT) 6E, 46-6.5, 171, 183C, 184, 205, 205A)

***There are two additional HRS Chapters that are also pertinent*: 115, Public Access to Coastal and Inland Recreational Area, and 264-1, Public highways and trails** (264-1 subsumed and codifies the Highways Act)

7. Page 259, draft MOU, "for DLNR" *add "Program Manger" next to "Na Ala Hele"*

8. General Comments

NAH defers to the DLNR Historic Preservation Division and State Park archeologists on details contained in the EIS relating to historic features and appurtenant regulatory and managmnet issues – and has intentionally directed comments only relating to the NAH Program and the specific issues associated with application of the Chapters 264-1 HRS (Highways Act).

It is challenging, if not impossible, to accurately assess the adequate degree of funding and necessary staffing associated with implementing either Alternative B or C. However, NPS should consider that the public expectation that may be fostered by the current and future publicity associated with the development of Ala Kahakai will make protecting un-funded and unmanaged sections of intact ala loa (and ancillary cultural features) very challenging and may also exacerbate trespass issues.

It has been the experience of NAH that once an initial trail corridor (in this case potential sections) is established, that the public may in specific locations attempt to link the sections via usage regardless of the degree of sustained management. This is partially why NAH has advocated Alternative B, concentrate efforts on a single authorized alignment – with the potential to phase in mauka-makai or parallel ala loa over time to recognize and manage features in a manner consistent with the traditional ahupua'a model. However, as stated before, NAH defers to NPS on the preferred Alternative based on the input solicited from the Big Island community.

While a community organization(s) will certainly be very valuable in the management and protection of various sections of ala loa that are incorporated into the project – this approach should not usurp NPS effort to obtain a sustainable staffing and funding base that can insure the perpetual management, once the aforementioned ownership issues are resolved and the alignment(s) is selected and open for public use.

One of the most important next steps is the formal adoption of the Draft MOU between the County of Hawaii, the State of Hawaii and NPS in order to initiate the working arrangement necessary to initiate the implementation of Ala Kahakai.

Mahalo for the opportunity to comment on the DCMPEIS.

Best Regards,

Curt A. Cottrell
Na Ala Hele Program Manager

c: Laura Thielen, DLNR Chair
Chris Yuen, Hawaii County Planning Director
Paul Conry, DOFAW Administrator
Brian Flower, HP
Holly McEldowney, SP Archeologist
Marianne Maigret, SP Archeologist
Tiger Mills, OCCL Planner
Roger Imoto, Branch Manager, DOFAW
Irv Kawashima Hawaii NAH Specialist
Clement Chang Hawaii NAH Specialist
Hawaii NAH Advisory Council

LINDA LINGLE
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LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI
FIRST DEPUTY

KEN C. KAWAHARA
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESEERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

January 15, 2008

Aric Arakaki
Superintendent, Ala Kahakai NHT
73-4786 Kanalani Str., #14
Kailua-Kona, 96740

LOG NO: 2008.3810
DOC NO: 0801TS06
Archaeology

Dear Mr. Arakaki:

SUBJECT: National Historic Preservation Review – Section 106.
Ala Kahakai National Historic Trail, Draft Comprehensive Management Plan & Environmental Impact Statement
Island of Hawai'i

Thank you for the opportunity to comment on the aforementioned project. The management of the Ala Kahakai NHT is an ambitious and complex undertaking and will require the cooperation of many agencies in order to succeed. Thank you for considering our views on the Draft EIS. This Draft EIS evaluates the impacts of three alternatives of management for the NHT.

We concur, in general terms, that Alternative C is the preferred action alternative. Alternative A, no action, is not proactive enough to promote the long-term preservation or interpretation of the important cultural features along the trail, especially along those segments of trail not on NPS land. Alternative B, is limited in scope, and while it may accomplish the stated goals of preservation and interpretation, it does so only for a narrowly defined linear corridor. Alternative C, in contrast, places the values and world-view of the Hawaiians themselves at the center of the trail's management philosophy. Managing the multidimensional trail system within the paradigm of the Ahupua`a land use system is, first and foremost, culturally appropriate. In addition, treating the NHT more holistically and including broader elements of environmental and cultural stewardship will engage the public in the trial's development.

That said, the multiple jurisdictions and management authorities must be well planned and thoroughly thought through in order to avoid conflict or confusion over responsibilities on lands not owned by the National Park Service but potentially administered by them under this plan. As the plan states, consistency in the preservation, development, management and marking of the trail through various jurisdictions will be a challenge. The SHPD awaits further details in this regard and looks forward to the development of an appropriate Memorandum of Understanding with the National Park Service should this alternative be pursued. *Imua ka kou!*

Aloha,

Nancy McMahon, Acting Archaeology Branch Chief
State Historic Preservation Division
TS

LINDA LINGLE
GOVERNOR OF HAWAII

LAURA H. THIELEN
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BOARD OF LAND AND NATURAL RESOURCES
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
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DIVISION OF STATE PARKS
POST OFFICE BOX 936
HILO, HAWAII 96721-0936

November 13, 2007

TO: Morris M. Atta
Land Division Acting Administrator

FROM: Glenn Y. Taguchi
Hawaii Parks District Supt.

SUBJECT: Draft Ala Kahakai National Historic Trail Comprehensive Management Plan and Environmental Impact Statement

We favor the development of a comprehensive Ahupua'a Trail System for the Ala Kahakai National Historic Trail. The challenges we foresee include, but are not limited to the following:

1. Funding for infrastructure development, including compliance with ADA guidelines;
2. Agreement with private land owners/developers and State and County governments;
3. Camping, especially on private property and culturally sensitive areas;
4. Security at the starting points where vehicles may be parked for long periods of time and at designated camp sites that may be easily accessible;
5. Accessibility to medical attention;
6. Illegal commercial activity on government lands; and
7. Issues of carrying capacity.

c: SP Administration

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LAND DIVISION
2007 NOV 15 A 10: 19
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

LINDA LINGLE
GOVERNOR OF HAWAII

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DEPUTY DIRECTOR - WATER

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OFFICE OF CONSERVATION AND COASTAL LAND
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

REF:OCCL:TM

Correspondence: HA 08-82

DEC 10 2007

MEMORANDUM

TO: Morris Atta, Acting Administrator
Land Division

FROM: Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

SUBJECT: Draft Ala Kahakai National Historic Trail Comprehensive Management Plan and Environmental Impact Statement Located on the Island of Hawaii from Upolu Point, North Kohala to Hakuma Point, Puna

The Office of Conservation and Coastal Lands (OCCL) has reviewed the subject document and supports the rejuvenation of the Ala Loa. Proposed land uses within the Conservation District shall be reviewed by the Department to determine what type of authorization may be required prior to implementation. We request that our Conservation District rules and regulations noted as the Hawaii Administrative Rules, Chapter 13-5 be included in Article II: AUTHORITY of the Draft Memorandum of Understanding located in Appendix F.

The National Park Services may wish to apply for a blanket authorization Conservation District Use Permit to implement minor land uses such as signage and trail identification markers for areas within the Conservation District for the entire trail length to insure consistency of trail indicators.

LINDA LINGLE
GOVERNOR

BRENNON T. MORIOKA
ACTING DIRECTOR

Deputy Directors
MICHAEL D. FORMBY
FRANCIS PAUL KEENO
BRIAN H. SEKIGUCHI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:

STP 8.2742

January 9, 2008

Superintendent
National Park Service
U.S. Department of the Interior
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, Hawaii 96740

Dear Superintendent:

Subject: Draft Comprehensive Management Plan and Environmental Impact Statement
Ala Kahakai National Historic Trail, Island of Hawaii

We have the following comments on the proposed plans for the subject trail:

1. We understand the path of the trail will need to be further researched and surveyed to determine actual conditions along the trail, path size and alignment/direction for the trail.

2. Locations where the trail path will or may cross or abut any of the lands, easements or right-of-way under our jurisdiction will need to be identified. Advance consultations with our Department and the respective affected division (airports, harbors and highways) should be done so that any impacts, conditions or requirements of use, and necessary documentations can be addressed. This would include responsibilities for work, construction, and funding of any tasks associated with implementing the path of the trail.

3. While the possibility of additional locations exist, locations where possible impacts on our transportation facilities could occur are: Kona International Airport at Keahole (KOA), State Route 160 (Ke-ala-o-Keawe Road to the City of Refuge), and Kawaihae Harbor. Specific sites at the airport and harbor will have to be identified and delineated by the National Park Service. The Draft EIS made general statements related to the trail at or around Kawaihae Harbor. Our Harbors staff looks forward to getting clarifications from the National Park Service regarding the trail going through our harbor facility. Our Airports staff noted that the trail might have been affected by construction work of certain portions of KOA Airport.

STP 8.2742

4. Since further work and details associated with the trail will need to be done by the National Park Service, we will need to reserve the right to examine, evaluate and comment on these plans by the National Park Service when they relate to locations where the trail affects or enters our facilities.

We appreciate the opportunity to provide our comments.

Very truly yours,

Francis Paul Keno

for BRENNON T. MORIOKA, PH.D., P.E.
Acting Director of Transportation

BOB JACOBSON
Councilmember

Chair, Environmental Management Committee
Vice-Chair, Finance Committee

333 Kīlauea Avenue, Second Floor
Ben Franklin Building, Hilo, Hawai'i 96720

Mailing Address: 25 Aupuni Street, Suite 200
Phone: (808) 961-8263
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E-Mail: bjacobson@co.hawaii.hi.us

HAWAI'I COUNTY COUNCIL

County of Hawai'i

December 4, 2007

Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, Hawai'i 96740

Re: Comments in Response to the Draft Comprehensive Management Plan & Environmental Impact Statement for the Ala Kahakai National Historic Trail

Aloha:

Upon reviewing the draft management plan and EIS relating to the Ala Kahakai National Historic Trail, I deem Alternative C the most sensible. It is important to ensure access remains open from the mauka end to the makai end of the trail, as the trail was a traditional means of communication for native Hawaiians in ancient times. Ke Kānāwai Māmalahoe, The Law of the Splintered Paddle, allows all travelers safe passage on public roadways and trails, not only from being assaulted by our fellow man, but also from any attempt to prevent free passage on an established trail. This historic law has laid the foundation for modern public safety in the State of Hawai'i; thus, it must be honored.

The Ala Kahakai is a treasure that must be preserved for all to enjoy. I will be introducing legislation to support the prohibition of sales of trail remnants until the management plan is finalized. Please contact me should you feel the need for further clarification on my opinions expressed here.

Mahalo,

Bob Jacobson, Member
Hawai'i County Council

BJ/mf

District 6 ~ Upper Puna, Ka'ū, and South Kona
Hawai'i County Is An Equal Opportunity Provider And Employer

Ray Broggini
Ala Kahakai Trail Association
PO Box 6030
Kamuela, HI 96743

Aric Arakaki, Superintendent
National Park Service
Ala Kahakai National Historical Trail
73-4786 Kanalani Street, #14
Kailua-Kona, HI 96740

December 30, 2007

Dear Superintendent Arakaki,

What a pleasure to receive the CMP/EIS for the Ala Kahakai Historical Trail and to hear your informative presentations at the public gatherings for comments in November.

The request period will I hope bring further clear and useful ideas on board. Mahalo to you and your entire staff for making a reality out of ideas. We have so many people and organizations to thank for the progress so far and are humbled and grateful at the results we have seen.

The Ala Kahakai Trail Association is currently being organized specifically to support the NPS in the implementation of the trail plan. It recognizes the public purpose of the legislation that established the Trail and will appropriately and actively support the NPS with historical trail preservation, management, and public use as currently cited in all of the proposed management alternatives of the CMP.

As the CMP states, it is acknowledged that the success of the initiative rests in the hands of our local communities with support from government and private organizations. Working within a broad range of community interests, the Ala Kahakai Trail Association will play a pivotal role in acquisition and coordination of the delivery of funding support and resources to the NPS and to the many communities involved with Trail use and management.

We look forward with much Aloha and Gratitude to working with all involved organizations now and in the future as we build our capacity to bring the Trail both "back" from its history and forward into the future. Mahalo a nui loa for allowing us to be of service on this most important part of Hawaiian culture.

With gratitude,

Ray Broggini (MD)
Board Member
Ala Kahakai Trail Association

cc. Yvonne Yarber Carter
Keoki Carter

E MAU
NA ALA HELE
P.O. BOX 6384
KAMUELA, HAWAII 96743

"To perpetuate Hawaii's Trails for Hawaii's People"

30 December 2007

Mr. Aric Arakaki
Superintendent
Ala Kahakai Nation Historic Trail
73-4786 Kanalani St. #14
Kailua – Kona, HI 96740

Dear Superintendent Arakaki:

We, E Mau Na Ala Hele, wish to comment on the Ala Kahakai National Historic Trail Draft Comprehensive Management Plan. Our non-profit trails advocacy group was instrumental in helping achieve official recognition of the Ala Kahakai as a National Historic Trail. We have been actively hiking, documenting, and working to protect ancient and historic Hawaiian trails for almost thirty years, and wish to continue our involvement in planning, managing, and protecting this trail.

In agreement with the management plan, we prefer Alternative C: the ahupua'a approach for a system of trails. Including certain selected mauka-makai, parallel, and connecting trails will provide a richer and more realistic interpretation of Hawaii's trails and history. It is commendable the planners wish to include canoe water routes as an integral part of the coastal trail system. We would, however, like to caution that developing of the mauka-makai and other connecting trails should not overshadow identifying, preparing, and opening the main lateral shoreline trail. If resources are limited, we advise selecting and concentrating on a few important trail hubs with the major mauka-makai trails, keeping the priority highest on the linear shoreline trail.

The management plan clearly states that to make Alternative C come to fruition, a very robust non-profit trail partner will be required. This is a major concern of E Mau Na Ala Hele. We offer our continuing strong support as a trail partner. With our large and interested membership, we feel we have great potential to fill this very critical need.

We also believe trail management through partnership with local communities and families with traditional ties to the land, is vital. Where families or local community groups cannot be identified, the NPS should partner with other organizations interested in stewardship of the trail.

We are very pleased the Comprehensive Management Plan is nearing completion so work identifying, and opening the various trail segments to the public, can begin. We hope this process can move forward expeditiously so there will be feet on the ground on approved and accessible trail sections as soon as possible. We urge the timely preparation of

infrastructure necessary to open the planned 15-year targeted area of Kawaihae to Pu'uhonua o Honaunau. We also urge as much protection and preservation as possible for areas of the trail outside of the initial targeted area. Being present on the trail through volunteer projects, hiking, education, and outreach, is one method of preserving and perpetuating the trail.

An additional aspect of the trail we feel should not be overlooked is the history of other ethnic immigrant groups such as the Japanese, Chinese, Portuguese, Koreans, Puerto Ricans, and Filipinos as well as explorers, missionaries, whalers, and others who have contributed to the rich history of Hawaii. Their stories, too, are important at different places along the trail, and, where applicable, should be recorded and celebrated.

E Mau Na Ala Hele concurs the CMP is an excellent working plan, and now, before more of the trails are lost, is the time to move forward. We offer our full support to the Superintendent and the NPS in volunteering as a 501 (C)(3) non-profit partner to help realize the goals of this management plan.

Sincerely and with aloha,

Barbara Schaefer

Barbara Schaefer
President,
For the Board of Directors
E Mau Na Ala Hele

cc: Meredith Kaplan, Project Manager
Jon Jarvis, Pacific West Regional Director
Board of Directors, E Mau Na Ala Hele

HISTORIC HAWAI'I FOUNDATION

November 9, 2007

Arik Arakaki
Superintendent
Ala Kahakai National Historic Trail
Kaloko-Honokōhau National Historic Park
74-4786 Kanalani Street, #14
Kailua-Kona, HI 96740

RE: Draft Comprehensive Management Plan for Ala Kahakai National Historic Trail

Dear Mr. Arakaki:

Thank you for providing the opportunity to comment on the Draft Comprehensive Management Plan for Ala Kahakai National Historic Trail.

Since 1974, Historic Hawai'i Foundation (HHF) has been a statewide leader for historic preservation. HHF's mission is to preserve and encourage the preservation of the historic buildings, places, objects and communities of Hawai'i.

Historic Hawai'i Foundation congratulates you and the planning team on the thoroughness and thoughtfulness of the alternatives included in the draft Comprehensive Management Plan. This kind of long-range planning is critical to understanding the vision, goals, strategies and opportunities available to the Historic Trail and the community. While we recognize that the hard work of identifying resources and making shorter-term management decisions remains, the plan itself will help to guide and focus those efforts.

I would like to reinforce the comments made during the public outreach: the physical preservation of the historic places and resources is critical; and that the associated perpetuation of native Hawaiian history, culture, beliefs and stories is as necessary as protection of the land and historic sites.

Historic Hawai'i Foundation concurs with the preferred alternative set forth in the draft CMP. By broadening the concept of the trail from a linear transportation corridor to an important link in the ma uka-ma kai and ahupua'a systems, a more complete understanding and commitment to the cultural landscape is possible.

The concept of a community-based management model that includes a sustainable, traditional and culturally-sensitive approach to reclaiming of the trail by the local community is also very exciting. While it promises to be challenging at times, this management model is important to community-building. It recognizes the role of the National Park Service as a partner in protecting resources and managing the natural and cultural resources of the Trail.

680 Iwilei Road, Suite 690 / Honolulu, Hawai'i 96817 / Tel (808) 523-2900 / Fax (808)523-0800
Email preservation@historichawaii.org / Web www.historichawaii.org

Please let me know if you need any additional information. We look forward to the completion of the planning process and the successful implementation of the final Comprehensive Management Plan.

Very truly yours,

Kiersten Faulkner

Kiersten Faulkner, AICP
Executive Director

Ho`okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu`u Drive
Kailua, Hawai`i 96734
(808) 226-3567
PeterYoung@hawaii.rr.com

December 24, 2007

Superintendent, Ala Kahakai NHT
73-4786 Kanalani Street, #14
Kailua-Kona, HI 96740

Subject: Ala Kahakai National Historic Trail Draft Comprehensive Management Plan & Environmental Impact Statement

Dear Superintendent:

As a consultant on behalf of North Kona Village, LLC, I offer the following comments regarding the Ala Kahakai National Historic Trail (NHT) Draft Comprehensive Management Plan and Environmental Impact Statement (EIS).

We want to note a correction to the information provided on page 35 of the EIS:

> *O'oma Development: Planning continues for this private development. Adjacent and north of Kohanaiki, it includes residential uses, an 18 hole golf course, a public shoreline park with facilities and camping, and an alignment of the Ala Kahakai NHT as the existing shoreline trail.*

The private development planned for 'O'oma no longer includes plans for an 18-hole golf course.

North Kona Village, LLC owns approximately 301 acres at 'O'oma:

- 217.56-acre parcel identified by Tax Map Key (3) 7-3-09:04.
- 83-acre parcel identified by Tax Map Key (3) 7-3-09:22.

Two historic trails run through the 'O'oma property: the Mämalahoa Trail/Old Government Road and a shoreline trail, which is proposed to be part of the Ala Kahakai National Historic Trail system.

We understand that your preferred alternative "C" (ahupua'a trail system) includes these two trails to be part of the Ala Kahakai National Historic Trail system, as shown in Map 12 on page 100 of the EIS.

The proposed plans for 'O'oma will preserve the Mämalahoa Trail in place with a buffer on both sides. The historic Mämalahoa Trail is approximately 10 feet wide within a 30-foot wide easement and runs north-south through the property. A buffer of 50 feet on both sides of the Trail will remain undisturbed. Therefore, the Mämalahoa Trail with the buffer will provide a 110-foot wide open space corridor, which is approximately 2,520 feet long, and includes approximately seven acres. There will also be an additional 60-foot building setback from the buffer on both sides.

Do well by doing good.

The Ala Kahakai National Historic Trail is located within the property area designated as shoreline park and coastal preserve. The 18 acres along the shoreline will be designated as a public shoreline park, and will be an extension of the beach parks planned at The Shores at Kohanaiki and NELHA. The shoreline park will include parking, comfort station, and a cultural public-use facility. These park building improvements will be located approximately 330 feet away from the shoreline and outside of the shoreline setback area.

The 57 acres mauka of the shoreline park will be designated as coastal preserve. The coastal preserve contains known archaeological and cultural sites, including burials. Therefore, to protect the integrity of these sites, the coastal preserve will remain generally undisturbed and development will be prohibited, with the exception of trails between the community and the shoreline.

As demonstrated in our proposed plans for 'O'oma, we support the idea of preserving and improving the trails and allowing public access over them, and therefore, we would like to work with the National Park Service in this effort.

We look forward to discussing future trail plans with you. Should you have any questions, please do not hesitate to contact me at 226-3567.

Sincerely,

Peter T. Young

CC: Dennis Moresco, North Kona Village, LLC
Steven Lim, Carlsmith Ball LLP
Thomas S. Witten, PBR HAWAII

KAMEHAMEHA SCHOOLS

Superintendent, Ala Kahakai NHT
73-4786 Kanalani Street, #14
Kailua-Kona, 96740

December 20, 2007

Dear Superintendent of the Ala Kahakai,

The Kamehameha Schools Land Assets Division would like to take this opportunity to provide public comment on the Ala Kahakai Comprehensive Draft Management Plan and Environmental Impact Statement. The proposed trail corridor that extends from Hawī to Volcanoes National Park along the coast of Hawai'i Island has a number of important trail systems that were built by Native Hawaiian ancestors in both pre-contact and early historic times. Within this corridor are a number of important landholdings that are part of the land legacy passed down to Ke Ali'i Bernice Pauahi and tracable to the lineages of Kohala and Kona chiefs that aided Kamehameha I in the unification of the Hawaiian Islands. These landholdings include:

District	Ahupua'a
Kohala:	Pu'uepa, 'Upolu, Puanui,
N. Kona:	Ka'ūpūlehu, Makalawena, Pua'a, Kahalu'u, Keauhou 1, Keauhou 2
S. Kona:	Kahauloa, Ke'ei 1, Ke'ei 2, Hōnaunau, Keōkea, Keālia 1
Ka'ū:	Pākini Nui, Pākini Iki, Kawela, Punalu'u, Hionamoa, Pā'au'au.

The Kamehameha Schools supports the National Park Service's efforts protect and preserve the ancient and historic trails within the corridor from increased pressures of population growth and urbanization. These trails provide critical paths and connections to resources and places for Native Hawaiians to practice and maintain traditional lifestyles. We are concerned however that the proposal to build a continuous trail system that extends from Hawī in to Volcanoes National Park would result in serious adverse impacts and problems for landowners. We feel that any alternative that links historical properties by modern connectors violates the history and spirit in which these trail systems were originally constructed. These alternatives serve and promote the interest of recreational activities over the maintenance of traditional lifestyles and stewardship.

As land managers, we know that undirected and anonymous public access will lead to a number of potential adverse impacts to these land areas. The inability to account for human activities will result in undesirable trail behavior which will lead to compounded problems for landowners that include: the criminal trespassing into adjacent private properties, impacts on the integrity of associated cultural resources (such as modification or destruction of sites) as well as rare and endangered natural resources, vandalism, and theft (or looting). Greater access will require

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KAMEHAMEHA SCHOOLS

larger community support and more funds by State and Federal agencies towards enforcement and protection. The current plan does not provide adequate resources to address these issues.

Kamehameha Schools Land Assets Division would like to you to consider an older alternative that was put forth as an option. **Alternative D: "Historic Trail Clusters"** calls for the restoration and certification of authentic historic trail segments only. This alternative does not include the construction of non-historic connector trails that would result in a continuous coastal trail. This option honors and protects actual historical trail segments built by our ancestors and supports the continued local usage of trail clusters by living descendents. We feel this option would help discourage irresponsible behavior associated with unaccounted transient movement from one area to another.

In the event that the Alternative D: Historic Trail Clusters could not be revisited, we would then advocate for **Alternative A**: **"No Action"** that assumes that existing programs, facilities, staffing and funding would generally continue at current levels. The Ala Kahakai NHT would consist of trail segments within the four national parks through which it passes and only a few other segments, likely on state lands.

Mahalo for your time and the opportunity to comment,

Kekuewa Kikiloi

Kekuewa Kikiloi

Cultural Assets Manager
Kamehameha Schools
Land Assets Division

567 SOUTH KING STREET HONOLULU, HAWAI'I 96813 TELEPHONE (808) 523-6200 FAX (808) 523-6374

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Ka'u
FARM & RANCH COMPANY

January 17, 2008

Aric Arakaki
Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, Hawai'I 96740

Dear Aric:

I have had the opportunity to review the Ala Kahakai National Historic Trail Draft Management Plan and Environmental Impact Statement dated August 2007.

As a landowner within the project area I have some concerns:

First: The project is designated as a National *Historic* Trail. The definition of historic implies that the trail exists or has existed in history. While it is documented that this trail does, or did, exist in many places, the trail corridor you have outlined in the Draft Management Plan does not accurately follow the existing trail. It is misleading to designate a *Historic* trail corridor that is interpolated and does not follow the documented or physical trail alignment. If we are to preserve a *Historic* trail, it should follow the trail as it exists, or existed, on the ground and should be supported by historical documents and field surveys.

Second: All of our land is leased to agricultural enterprises. I think your management budget is woefully inadequate to cover fencing, signage, and insurance necessary in order to indemnify landowners, farmers, and particularly ranchers. Who will pay for the miles of fencing, and maintenance of that fencing, that will be required to keep livestock separated from hikers? Who will bear the burden of liability on a trail, which is open to the public, and may be potentially unsafe due to underfunded management?

Third: Many of the vast archaeological and environmental resources that have been preserved for centuries have survived due to managed access by landowners. When you interpolate a trail, that does not now exist, publish maps, and invite the public to tour these sites, with an inadequately defined and underfunded management plan for protection of these resources, you put the resources in jeopardy. This, I believe, would be counterproductive to your goals.

Fourth: I think you need to actively and directly seek out and engage ALL affected landowners. My suggestion is that you involve them directly in this process, particularly when you are planning a project on their land. What is most troubling to me is that at a public meeting that I attended, in Pahala, on November 7, 2007, the spokesman told the group that the Ala Kahakai National Historic Trail Project is a vehicle to use Federal funding to stop development. This is clearly a taking of property rights without just compensation, which raises multiple legal

95-4968 Mamalahoa Highway • Box 1109 • Naalehu, HI 96772 • Phone: 808-929-9550 • Fax: 808-929-9555

questions. If you are seeking voluntary landowner participation in this project, this certainly is not the right approach and is not pono.

While I believe the Ala Kahakai National Historic Trail is a worthy and honorable project, and I believe it would be a valuable and important amenity for the community, I think is should follow the existing *Historic* trail alignment, its management should be adequately funded and you should actively engage ALL stakeholders, particularly landowners, whose properties would be directly affected.

I would be happy to participate in further discussions on this project. Please let me know of any future events or opportunities to participate.

Mahalo for this opportunity to comment.

Sincerely,

Chris Manfredi

Pahualiikoaokaawaloa

Kūlana Huli Honua
Foundation of the Search for Wisdom
a Non-Profit, 501-C3 Organization
Mikahala Roy, Executive Director

Aric Arakaki, Superintendant
National Park Service
Ala Kahakai National Historic Trail
Kaloko-Honokohau NHP
74-4786 Kanalani St. #14
Kailua-Kona, Hawaii 96740

November 5, 2007

Dear Superintendant Arakaki:

Probably the most important aspect discussed at the public meetings regarding the Ala Kahakai National Historic Trail is the statement made by former President William Clinton that has became a lawful instrument now referred to readily as the Apology Bill. In this bill, former President Clinton acknowledges the unlawful acts perpetrated by the United States related to an attempted overthrow of the lawful Hawaiian Kingdom government of these Hawaiian Islands.

As such, it is acknowledged that the United States is a government that occupies Hawaii; that the Hawaiian Kingdom still exists with all laws governing the well being of the lands of the pae 'aina standing intact.

The programs and plans that you work hard to create with the people of these islands will find success, Ric, not because of the government you represent, but because of the nature of you, their man in charge and your relationship with the people. I am President of Kulana Huli Honua, Foundation of the Search for Wisdom at Kamakahonu, Kona. We are among many people and organizations who will work with you because we know your commitment to the aspect of life, to the word 'Oiwi know well as "pono".

We work gladly with you and the people of our communities toward a healthy and happy future in Hawaii. What happens when the laws of the Kingdom of Hawaii and those that govern the U.S. differ in semantics when it comes to the care of sacred lands? We find ourselves in court over such differences at this time. Hawaiians are not in comfort as they participate in meetings such as this.

All lands in Hawaii are sacred. Kulana Huli Honua feels that all truths of the past that are part of an oral society must be respected and supported by the occupying government. Sacred ceremony such as that which occurs at sacred sites should not be forced to be open to those who are there only in curiosity. I am a Kahu of Keolonahihi which is part of Kaluaokalani also and the care of that area will not follow a national park plan, it will follow the traditional plan determined by

P.O. Box 596 • Kailua-Kona, HI 96745-0596
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those people who have inherited the care of this place. "Pono" is the condition that will guide the outcomes.

I, as President of this organization and a Kahu of Ahu'ena Heiau, will submit another letter to you giving more testimony related to this Draft Comprehensive Management Plan & EIS. I have not had the time to sufficiently review and comment on this draft although my father, the late David K. Roy, Jr. and I were at more than one of the community meetings and welcomed you to use our Kulana Room office for one of your meetings held on our island. Presently, my organization is a party to a lawsuit so as you can see, the need to defend sacredness is and continues to be the order of the day in Hawaii.

I am also vice-president of Na Kokua Kaloko Honokohau, I know that this organization will wish to make full comment on this Draft and we will be pleased to do so. As you know, kupa, or natives to Kona created the opportunity and then helped pass the law to enable the creation of the Kaloko-Honokohau National Cultural Park. The name was changed to become the Kaloko-Honokohau National Historical Park without the consent of those persons who formed the park. Culture speaks to a living thing that needs care and funding to go toward the flourishing of cultural activities. Historical refers to something that can be reduced, and I do mean reduced, to writing. The bible will never take the place of the words, practices and historical movements of Jesus, a Master.

People who are not among the established families of the land of Hawaii may not guide or be sole decision makers regarding the future of these lands. The concepts you hold in your purview I believe have the makings of sure footing for footsteps to be taken on our path. Namely, the federal occupying government should place resources to help to support and identify the way of life of the first people of these islands, posthaste, such that we lose no more of the traditions that only Hawaiians can give the world.

After this fashion, Kulana Huli Honua is a group that appreciates your good time and expertise. Mahalo to you for your special kokua to me as a traditional guardian of Kamakahonu and to your support to those who support Kamakahonu on a daily basis. I might say here that on page 8 your failure to name Kamakahonu as the land place it is is somewhere that I may start to make comment. However, I do believe you quote Mr. Ross Cordy who was reprimanded for using work time toward writing a publication, "Exalted Sits the Chief" sharing the wealth of historical information he was privy to as a SHPD worker for the state of Hawaii for his own gain in this publication he gains royalties on. "Royal Centers", "royalties" – the use of the words are similar. Why not stay with the Hawaiian words such as Pa alii (enclosures of the alii) as they've been called for generations before us.

We are pleased that Ahu'ena Heiau is depicted upon the cover of this publication not because we look forward to help from the United States with its past history of harm to Hawaiians and to these islands, but because many people will gaze upon this report and they will behold my father's and many other's work – the work of the chiefs before him – the work that was meant to be "felt" by all human beings. The feeling for this and all sacred sites is the presence of Divine Creator.

Sincerely,

Mikahala Roy

Mikahala Roy, President
Kulana Huli Honua

2

PATH ~ PEOPLES ADVOCACY FOR TRAILS HAWAI`I

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Ann C. Peterson

Mission
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December 31, 2007

Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, HI 96740
(808) 326-6012

Aloha Kakou:

We wish to respond to the request for public comment on the Ala Kahakai National Historic Trail (NEPA Comprehensive Management Plan/DEIS) as published in the OEQC November 8th, 2007 issues (12/31/07 comment deadline).

We had the opportunity to hear about the various alternatives for the trail system at a meeting in Waimea and strongly support Alternate C as the best option for preserving and managing the rich cultural heritage of the Ka'u-Kona-Kohala coasts.

First and foremost, it is clear that Alternative C will require the most resources in terms of time, funding and coordination with other agencies. PATH, a 21 year old bicycle and pedestrian advocacy organization, has a mission to help connect the people and places on Hawaii Island with pathways and roadways. In pursuit of our mission, PATH is willing and able to be a partner in the need to educate the public on the proper use of this trail system. We recognize the significant public demand for access must be properly balance with management and stewardship of the land. If we can be of assistance in this way, please let us know.

Secondly, we also want to emphasize that with the significant timeline it is important to open smaller sections of trail for people to access. This is especially important for the *kupuna* of our community, many of whom once knew these lands though fishing, ranching or other subsistence means, and still harbor a desire to experience these lands with their families. One way to do this is to look at smaller, looped sections of the trail system which use the existing mauka-makai connections to create hikes for a variety of users. The looped sections would add value by reaching established trailheads and providing greater connectivity to biking and hiking circulation routes. Two such loops are:

1) Kohala Bay Trail – extend mauka to connect with Mamalahoa Highway
2) Mamalahoa Trail – extend south to Makala Blvd. to connect with Shared-use path under contruction from Henry St.

Regarding the end points of the Ala Kahakai trail system, we strongly urge the National Park Service to:

1) Maintain connectivity to the historic fishing village of Ho`okena by making this the initial southerly terminus of the trail. Ho`okena Beach Park is a very logical trailhead. Ho`okena is also the southern terminus of the 60-mile Kona Heritage Corridor (along the Mamalahoa Highway from Pu`uwa`awa`a).
2) Make development of the north section from Lapakahi to Upolu Point a priority area due to the current open space afforded now that will become more and more difficult to preserve as demand for development spreads to this region.

In addition to the coastal routes, there are many other historic trails that the community development plan process has illuminated as important cultural and natural resources. These trails provide important connectivity to major places of education, commerce, and residential neighborhoods. It's critical to make them a part of the trail system to create destinations within the trails system. These include:

- Judd Trail (between Ali`i Drive and Mamalahoa Highway)
- Hawai`ian Railroad Company (between Mahukona and Upolu Point)
- Kona and Kau Railway (Honuaula to Onouli)
- Kau Sugar Company (Honuapo to Na`alehu)
- Kau Sugar Company (Pahala to Punalu`u)

The proposed Auto Route should also include bicycling accommodations as an alternative to the automobile. The potential as a destination for eco-tourism is enormous but more importantly, this will become a backbone to viable and safe transportation alternatives for residents wishing to use a bicycle as their primary means of transportation.

As a next step, we strongly urge the National Park Service to conduct a GPS centerline survey as soon as possible to begin to generate trail alignment, adjacent property ownership and jump start the future meets and bound survey process.

PATH remains a willing partner in the execution of this ambitious and important trail system for Hawaii Island.

Mahalo Nui Loa,

QUEEN EMMA LAND COMPANY

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November 26, 2007

Mr. Aric Arakaki
Superintendent
Ala Kahakai National Historic Trail
74-4786 Kanalani St. #14
Kailua-Kona, HI 96740

Re: Comments on Ala Kahakai Trail Draft Comprehensive Management Plan and EIS

Dear Mr. Arakaki:

As requested in your October 1, 2007 letter, Queen Emma Land Company comments to the *Ala Kahakai National Historic Trail Draft Comprehensive Management Plan and EIS* are provided in this letter.

As quoted below, the purpose of the trail is admirable, and serves as a desired end product of the management plan.

> -- Preserve, protect, reestablish as necessary, and maintain a substantial portion of the ancient *ala loa* and associated resources and values;
>
> -- Provide for a high quality experience, enjoyment and education -- guided by Native Hawaiian protocol and etiquette -- while protecting the trail's natural and cultural heritage and respecting private and community interests. (pg. 15)

Please note Queen Emma Land Company's comments numbered below. The common thread to our comments is the actions and responsibilities of the various stakeholders, to natural and man-created events, as guided by the trail management action plan

1. In natural disasters such as an earthquake, tidal wave, erosion, and fire, what would be the trail management actions immediately prior, during, and after the disaster to protect life and property. If the disaster results in a trail section disappearing in a fully developed area, would a new trail be created in the developed area or would that section of trail cease to exist?

2. What would trail management do should man-created events result in damage to life and property. For example, what actions would the trail management take should people use the trail to access and desecrate caves located off the trail? Who is responsible to repair the cave damage and what would the various stakeholders be able to do to prevent future cave desecration?

3. Is there a timetable and benchmarks to achieve the purposes of the management plan? How will the people involved with trail management know if the management plan purposes are being achieved in an efficient manner? Will there be enough flexibility and financial resources to more efficiently achieve the purposes of the management plan?

Thank you for considering Queen Emma Land Company comments on the draft management plan. We commend you and the National Park Service in attempting to bring together the Ala Kahakai Trail.

Please contact us if there are any questions.

Sincerely,

Stuart C. Lau

Stuart C. Lau

Water Resources Research Center
Environmental Center

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MĀNOA

December 21, 2007
RE:0770

Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, HI 96740

Dear Superintendent:

Draft Comprehensive Management Plan and
Environmental Impact Statement
Ala Kahakai National Historic Trail
West Hawaii

The Comprehensive Management Plan/Environmental Impact Statement (CMP/DEIS) provides long-term direction for resource preservation and visitor use of the Ala Kahakai National Historic Trail. It was developed in consultation with National Park Service park and program managers; interested parties including landowners, native Hawaiian and trail groups; and the general public, and is based on an analysis of existing and projected natural and cultural resource conditions, visitor experiences, and environmental impacts, and costs. It primarily provides a framework for community management system and a vision to be fulfilled through future actions. The legislation authorizing the national trail identifies an approximately 175-mile portion of prehistoric *ala loa* (long trail) and other trails on or parallel to the seacoast extending from 'Upolu Point on the north tip of the Big Island down the west coast of the island around Ka Lae (South Point) to the east boundary of Hawai'i Volcanoes National Park.

General Comments

Alternative C as described in the draft management plan and environmental impact statement seems to be the most desirable one from a management standpoint. Alternative C involves state, county, public interest and private land owners in a meaningful way in managing the National Historic Trail. This alternative offers resources to those entities involved in helping manage the trials and adjacent areas. It helps the county fulfill its requirement to provide lateral easements to the shoreline insuring access to residents and visitors. Our concern is that this is also the most expensive alternative and we wonder whether sufficient funds will be available to implement this alternative. We note that part of the funding effort will include monies raised by community-based organizations. Many

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community-based organizations are capable of raising large sums of money in support of public facilities, the Friends of Public Television and Friends of Waikiki Aquarium are just two examples. There is no guarantee that sufficient funds will be raised to fully implement the plan described in Alternative C. We wonder what the Park Service will do in the event that fund raising efforts fall short of expectations.

Community Vision for the Trail (p. 15)

It is not clear from the narrative in this section how the community was involved in developing the community vision. Was there a series of meetings with the community or did it occur only at one time during the scoping process?

Gaps in Information and Research Needs (p. 29)

How long do you estimate it will take to research the trail and surrounding areas? Do you foresee the information being obtained within the life span of the management or is this a long-term project that may be completed at some time in the distant future?

Resource Protection (p. 40)

The use of volunteer docents along the trail will not only help with public education, but is another way to get visitors to comply with park rules. The experience at the Hanauma Bay Nature Preserve is that compliance with park rules is enhanced by the presence of volunteer docents.

Participation in Planning and Implementation of a Joint West Hawaii Parks Museum Facility (p. 43)

When do you envision that the West Hawaii Parks Museum will be built, designated or otherwise implemented? Do you foresee the National Park Service as the prime mover to get the facility built? Are you contemplating involving commercial firms as part of a partnership?

Potential User Capacity Indicators and Related Management Actions (p. 60-61)

In the list indicators of user capacity is the number of fires along the trails and the number of injuries. As more people hike the trails, the likelihood of more fires started by accident and more people getting injured could be indicators of over use. To the final indicator on page 61, we suggest that scheduling visit by large groups may help with crowding around important sites along the trail. Tour companies could voluntarily work with the park staff to schedule tour buses along the auto tour route or the park rules could require companies to schedule bus tours. Both the Arizona memorial and Hanauma Bay Nature Preserve require some form of group scheduling.

Alternative C: Funding--Administration (p. 98)

The reference to Alternative B in the second paragraph of this section should be Alternative C.

Alternatives Considered But Eliminated From Detailed Study (p. 104)

We believe the place name Hoyokena in the last paragraph on this page is misspelled. It should be Ho'okena.

Impact Terminology (p.141)

Although many documents of this type list impacts as adverse or beneficial, we would like to point out that these are value laden terms. Impacts that may be beneficial to one group may be adverse to another group. One example is the filling of a valley when a dam is built. Recreational boaters and fishers enjoy the benefit of the use of an artificially created lake while the people who may have inhabited the valley lose their place to live. We would rather see the impacts listed for each alternative and leave it to the reader to determine whether the impact is beneficial or adverse.

Effects on Special Status Species From Alternative A: No Action (p. 171-172)

In addition to the impacts to rare, threatened and endangered species (RTE) listed in Alternative A (the no action alternative), we believe another threat exists. If private parcels are sold and developed, we believe that the potential for major impacts to RTE could occur.

Final Comment

We understand the need to move the plan along, but we believe that public participation in the review of the draft CMP and the EIS would have been greater if it did not coincide with the holidays.

Sincerely,

Peter Rappa
Environmental Review Coordinator

cc: OEQC
James Moncur, Water Resources Research Center

Wailea Property Owner's Association

PO BOX 1537 • Kamuela, HI 96743 • TELPHONE (808) 885-7053 • FAX (808) 885-4716

October 04, 2007

Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, Hawaii 96740

Dear Sir:

As a 30 year resident who lives on the Ala Kahakai Trail, I understand the importance and historical significance of the trail.

In a recent article in the West Hawaii Today newspaper, it indicated that you are accepting suggestions for various uses over the trail.

I only have one, and that is to keep the trail free of vehicular access. Anything on wheels especially when propelled by noxious fuels can only advance the destruction of a beautiful historic trail. Let's keep it to foot traffic only.

Sincerely,

William T. White, III
President
Wailea Property Owners Association

Deborah L. Chang
P.O. Box 202
Pa`auilo, HI 96776
December 30, 2007

Mr. Aric Arakaki
Superintendent
Ala Kahakai National Historic Trail
73-4786 Kanalani St., # 14
Kailua-Kona, HI 96740

Dear Mr. Arakaki:

SUBJECT: Ala Kahakai National Historic Trail (NHT)
Draft Comprehensive Management Plan (DCMP) & Environmental Impact Statement (EIS)

As one of the founders of the E Mau Nā Ala Hele nonprofit organization, I have advocated for the protection and perpetuation of historic Hawaiian trails and the natural and cultural sites adjacent to these trails since 1979. I see the Ala Kahakai NHT as essentially sharing and implementing that vision. Over the relatively short time that I've been watching, many historic trails and cultural sites have been damaged or lost. As a member of the State's Nā Ala Hele Hawai`i Island Advisory Council, I see that program's limited resources, wide spectrum of responsibilities under its enabling legislation, and its subsequent inability to focus on the historic Hawaiian trails and the cultural richness of that unique resource. As such, I welcome the additional resources that the Ala Kahakai NHT brings to what needs to be a team effort.

I support Alternative C which treats the Ala Kahakai as a trail system and seeks to protect and restore the native Hawaiian network of trails, rather than a single trail. It is a more authentically Hawaiian model than was originally proposed. My comments and questions in this letter are primarily related to Alternative C. Under Alternative C, it will be a challenge to hold steadfast to priorities, while being flexible and opportunistic when trail acquisition potentials present themselves. There will be many pressures to change priorities, as everyone views their particular ahupua`a as most important. I hope that the priority under Alternative C will be to assemble a continuous lateral shoreline trail route while working on opportunities for mauka-makai connectors.

Funding and Staffing

Alternative C will require more human effort and agency resources than the other alternatives. However, the staffing needs, one-time project needs, reliance on public-private partnerships and cost-shares, etc. for a 15-year time frame do not appear to be substantially different for Alternative C compared to Alternative B. Much of the same work will need to be done (i.e., land title research, environmental, archaeological and cultural assessments, etc.) and the same disciplines needed, whether it is for a single trail or an ahupua`a trail network.

- I believe a Law Enforcement/Interpretive Ranger should be "Core Staff" for Alternative B as well as for Alternative C.

- P. 87 offers NPS assistance in reviewing land title records (a significant need when determining ownership status of historic trails), but Land Title Researcher/Abstractor does not appear on the "Other Needed Disciplines" list for Alternatives B and C.
- The estimate for the cost of developing two campsites (p. 97) seems low, considering the State Division of Forestry & Wildlife's cost-estimate for one composting toilet (including unit, shipping, transportation to site by helicopter, labor) in 2001 was $14,000 - $16,000.
- Is the cost of installing water catchment systems included somewhere in the One-Time Costs?

Historic Trail Ownership

The DCMP/EIS oversimplifies the state's "ownership" of historic Hawaiian trails. It is important to note that when land developments occur that contain ancient and historic trails, the common practice is for the state to "quitclaim" its ownership under the Highways Act of 1892 over the subject trails. The trails then become perpetual easements for public access and subject to varying levels of protection (or neglect) by the state and/or the private landowner(s). This is a legal process that can be quite controversial, especially if realignment of a traditional trail route is proposed. Sometimes in that process the private landowner does not acknowledge the state's ownership over the trail, but both parties agree that the end result will be the same, whether the trail is owned by the state or becomes a perpetual easement for public access. The Ala Kahakai DCMP/EIS inadequately discusses what the federal perspective and role might be in such deliberations.

Private Landowner Incentives

Pardon me if I missed it, but does the DCMP/EIS discuss incentives that exist in Hawai`i and/or other states to encourage private landowners to designate historic trails on their property as part of a NHT? P. 88 mentions encouragement of private landowners who have public access requirements in land use approvals to include those easements in the NHT. What would be the possible benefits or disincentives to the landowner? P. 89 says that landowners, etc. "would be encouraged to involve the local community in managing their segment of the trail." Again, what advantages would there be to the landowner or land manager? What kind of liability protection will there be? Without adequate incentives, it seems quite unrealistic to expect landowners to enter into trail management agreements, educate trail users, solicit funds for technical assistance, undertake activities that support the objectives of the NHT, etc. (p. 71).

Permit Reviews

The importance of permit reviews cannot be overstated. It is often because of those reviews that agencies are made aware of the presence of historic trails. I urge that the MOUs with the state and county include more than just applications involving the Conservation District and Planning Commission! A system needs to be worked out whereby applications determined to have potential impacts on historic trails within the Ala Kahakai corridor are sent to the Ala Kahakai NHT for review and comment. All of these reviews must be done in a timely manner, and approving agencies and applicants will need clear guidelines on when the Ala Kahakai should be included in the review process. Such applications include: Subdivisions, Special Management Area Assessments and Use Permits, Special Permits, Grading, Project Districts, Rezoning, State Land Use District Boundary Amendments, Leases of State-owned lands,

Environmental Assessments, and Environmental Impact Statements. A few of the forenamed applications require Planning Commission approval, but several of them do not.

The Ala Kahakai Trail Association

P. 88 of the DCMP/EIS openly states that if this Association's "capacity does not develop as anticipated," projects and programs may not be realized. The DCMP/EIS describes substantial reliance by NPS upon state, county and private entities to assume 50% - 60% of the costs and other responsibilities for trail segments. To achieve this, stable and committed partnerships must be formed. I saw little detail in the DCMP/EIS about the Ala Kahakai Trail Association. Since other NHTs rely upon "a variety of partners… to help with planning, constructing, managing, monitoring, and interpreting the trail with funds and in-kind services," (pp. 80 & 98), there must be lessons learned from the experiences of other existing NHT associations? How are NHT partnerships encouraged? How are the partners represented in the Association?

In summary, I support the establishment of the Ala Kahakai NHT. Alternative C is my first choice, although I have concerns that the "devil will be in the details." The DCMP/EIS contains many good intentions, but is short on contingency plans should the NPS encounter great difficulty in developing a "viable and highly effective" Trail Association, lack of stable and consistent support from community partnerships, and/or insufficient landowner and non-federal agency participation. Mahalo for your consideration of these questions and comments.

Sincerely,

Deborah L. Chang

Deborah L. Chang

c: Curt Cottrell, Nā Ala Hele
Barbara Schaefer, E Mau Nā Ala Hele
Christopher Yuen, County Planning Department

November 28, 2007

Aric Arakaki, Superintendent
National Park Service
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, #14
Kailua-Kona, HI 96740

Aloha Aric,

I am writing in support of Alternative C of the draft Comprehensive Management Plan and programmatic Environmental Impact Statement for the Ala Kahakai National Historic Trail. I urge the National Park Service (NPS) to proceed with this preferred alternative and provide as much funding as possible to protect and maintain these very important public trail corridors.

The island of Hawaii has undergone many major changes in recent years with a large increase in population and development. Preserving, protecting and ensuring access to historical public right of way are of key importance for the future enjoyment of the shoreline that we share. The time is now to take action to protect the Ala Kahakai trail; as I write sections of the trail in South Kohala are threatened between makai cliff erosion and walls of private residences to the mauka. Overall, the trail condition currently ranges from clearly defined to unmarked, overgrown and lost to natural erosion or development. In areas where the trail passes through resort development complexes, the path is confusing among golf course, hotel and residential infrastructure.

The responsibility for maintaining and protecting the physical trail and legal easements defining the path are currently spread among many different parties including the County of Hawaii, various State of Hawaii agencies, and resort associations. Determining the party to address access issues or problems on the trail corridor can be difficult to accomplish. I suggest that the plan include provisions for the NPS to do more to coordinate management of the trail. I fully support the NPS management of state owned trail segments through conveyances of less-than-fee ownership interest. Inclusion of the stake holders such as private landowners, resort management and community groups is vitally important; but the plan seems to assume greater participation than may be possible currently. For example although the community has been very involved in the national historic designation of the trail, a viable Ala Kahakai Trail Association does not currently exist. Na Ala Hele (State of Hawaii) has a dedicated trail crew but only funding for a couple employees to maintain many miles of trails across the island.

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Please consider increasing the fiscal projections to provide funding for the infrastructure and staff to support community participation, manage as many trail miles as possible and act as a central coordinator and repository of information for the whole trail corridor. The NPS has the experience, expertise and most important the ability to find the stories of the land and people and provide the interpretive programs, signs and guides to share these with all.

In addition, please consider expanding the "priority area" of the 15 year trail plan to encompass other areas along the trail path that may be threatened or in need of management. The current "priority area" only encompasses the areas of population density in the Kona and South Kohala areas; other trail corridor areas such as Mahukona, Miloli'i or South Point have significant use by locals and visitors and should be considered as a priority for management.

The Ala Kahakai trail corridor represents a great opportunity for the future of the Island of Hawaii. We have a chance amid rapid development and urbanization of the island to protect and enhance a resource for residents and visitors. A well marked, maintained and protected trail provides an attraction for visitors to enjoy the cultural and natural resources of the island. Funding for staff and infrastructure will help to guide appropriate use, keep the paths open amid development and share the stories of the land. Many of these areas are now being overused or damaged by uncontrolled use or development pressures. I urge the NPS to dedicate as many resources as possible and accelerate plans for the protection of the Ala Kahakai Trail.

Mahalo Nui Loa,

Benjamin Konshak
PO Box 44576
Kamuela, HI 96743

Cc:
Representative Mazie Hirono
Director Pacific Islands Support Office
Superintendent Kaloko-Honokohau National Historical Park
Superintendent Pu'uhonua o Honaunau

- **From:** “David Tarnas” [davidtarnas@hawaii.rr.com]

Sent: 12/29/2007 10:56 AM PST

To: Aric Arakaki

Subject: comment on Ala Kahakai NHT Draft Comprehensive Management Plan and EIS

TO: Aric Arakaki, Superintendent
FR: David Tarnas
RE: Comment on the Ala Kahakai NHT Draft Comprehensive Management Plan and EIS

Hi Aric ~

I am an environmental planning and project management consultant working for both public and private sector clients in the area of the Ala Kahakai Trail. At the public meeting in Waimea seeking comment on the Ala Kahakai NHT Draft Comprehensive Management Plan and EIS, I made the following comments in person. But, I thought I had better provide some written form of these comments as well.

1) Overall, I recommend the Alternative C, the ahupua`a system of trails. The mauka makai connection in the ahupua`a and the connections across the ahupua`a in the moku are important culturally and environmentally.
2) Planning for the trail should be coordinated with the Hawaii County Planning Department’s effort to prepare the Community Development Plans for North and South Kona, South Kohala and North Kohala. Coastal and mauka-makai trails are part of these plans. Please contact County Planning Director Chris Yuen for information on these plans.
3) Since the plan includes environmental management measures relating to anchialine pools and nearshore waters such as resource management and water quality monitoring programs, these should be coordinated with the West Hawaii Regional Fishery Management Area, which already has numerous marine protected areas along the coast, as well as the Hawaii County Planning Department and their effort to standardize the water quality monitoring programs along the coast as part of the Special Management Area permits. Please contact Dr. Bill Walsh of DLNR regarding the West Hawaii Regional Fishery Management Area, and County Planning Director Chris Yuen regarding the water quality monitoring programs.
4) Private landowners along the trails, including some of my own clients, such as Jacoby Development at the Kealakehe ahupua`a, and Earl Bakken at the Kiholo ahupuaa, have clearly expressed their interest in participating with the AKNHT system. But, this will require carefullly crafted agreements for public access and limiting liability. The trail should not further restrict land use in the parcels through which it passes, since state and county planning systems provide for this land use management.
5) Resource management measures for special ecosystems along the trail, such as anchialine pools, dryland coastal forests, rocky shorelines, and beaches, should be standardized and consistent with the DLNR measures already in place.
6) Standardized signage and interpretive programs should be developed and shared with the landowners along the route so that there is a consistent system used throughout the trail system.
7) Involving local communities in any economic activity relating to the trail is a good idea, but there will need to be substantial assistance provided to these communities to establish sustainable organizations.
8) Any economic activity relating to the trail should be carefully coordinated with the Hawaii DLNR since much of the trail is in Conservation District, in which there are specific restrictions on commercial activity.
9) Funding for the trail and all its associated resource management and interpretive programs should come from the federal government. This will supplement the existing (but entirely inadequate) state funding.
10) Construction of new sections of the trail should follow a standardized design that should be shared with all the landowners along the trail to provide a consistent appearance and resource protection along the trail.

Best wishes on the implementation of the plan.

Aloha,
David

David Tarnas
Marine and Coastal Solutions International, Inc.
P.O. Box 6882
Kamuela, HI 96743

Superintendent, Ala Kahakai NHT
73-4786 Kanalani Street, #14
Kailua-Kona, 96740

Aloha mai,

My name is Amber Nāmaka Whitehead. I am a resident of Hawai'i Island, born and raised in Pāpā, South Kona. These comments are submitted in opposition to the completion of a single continuous trail as proposed in Alternatives B and C in the Ala Kahakai Draft Comprehensive Management Plan and Environmental Impact Statement (Draft CMP/EIS).

I work in the field of Conservation and Natural Resources Management here on Hawai'i Island, and am currently a PhD student in the Botany Department at the University of Hawai'i at Mānoa. As such, I have seen firsthand the impacts of invasive species, population growth, and increased access on the natural and cultural resources of Hawai'i Island.

While I support the intention of the National Park Service to protect and preserve the ancient and historic trails within the corridor from increased pressures of population growth and urbanization, I am concerned that the management actions and strategies proposed in the Draft CMP/EIS are not sufficient to mitigate the deleterious impacts of increased access on natural and cultural resources. I am very concerned about the impact the increased usage of this trail will have on currently remote, fragile, and relatively inaccessible resources (anchialine ponds, 'opihi, coastal landscapes, wahi kūpuna, etc). I am also concerned about the impact that increased malihini access and usuage will have on the local and Hawaiian folks that currently utilize resources and practice in these areas. I am particularly concerned with the impacts these actions will have on the remote coastline and resources of Kapalilua, South Kona and Ka'ū. Past cases have shown that once access is opened to such places, it will be impossible to halt or control.

I ask you to reconsider the option of Alternative D: Historic Trail Clusters, as proposed in the 2004 Mangement Plan/EIS Planning Update http://www.nps.gov/alka/upload/ACF23FD.pdf (see page 11), which calls for the restoration and certification of authentic historic trail segments only. This alternative does not include the construction of non-historic connector trails that would result in a continuous coastal trail. This option honors and protects actual historical trail segments, and supports continued local usage of trail clusters, while not creating the malihini attraction of a continuous coastal trail.

Mahalo,

Amber Nāmaka Whitehead, Botanist
Pāpā, Kona Hema, Hawai'i Island
88-1489 B Mamalahoa Hwy. Captain Cook, Hawai'i 96704

Manini‘owali, N. Kona, NPS photo

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

D-13/October 2008

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