

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



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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 Kahakai¹ 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 'Upolu Point on the north tip of Hawai'i Island down the west coast of the island around Ka Lae (South Point) to the east boundary of Hawai'i 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: Ahupua'a 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 *ahupua'a* (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 *ahupua'a* system. During the 15-year planning period, the priority zone from Kawaihae through Pu'uuhonua o Hōnaunau National Park to Ho'okena 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 *ahupua'a* 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 Hawai'i and in Honolulu:

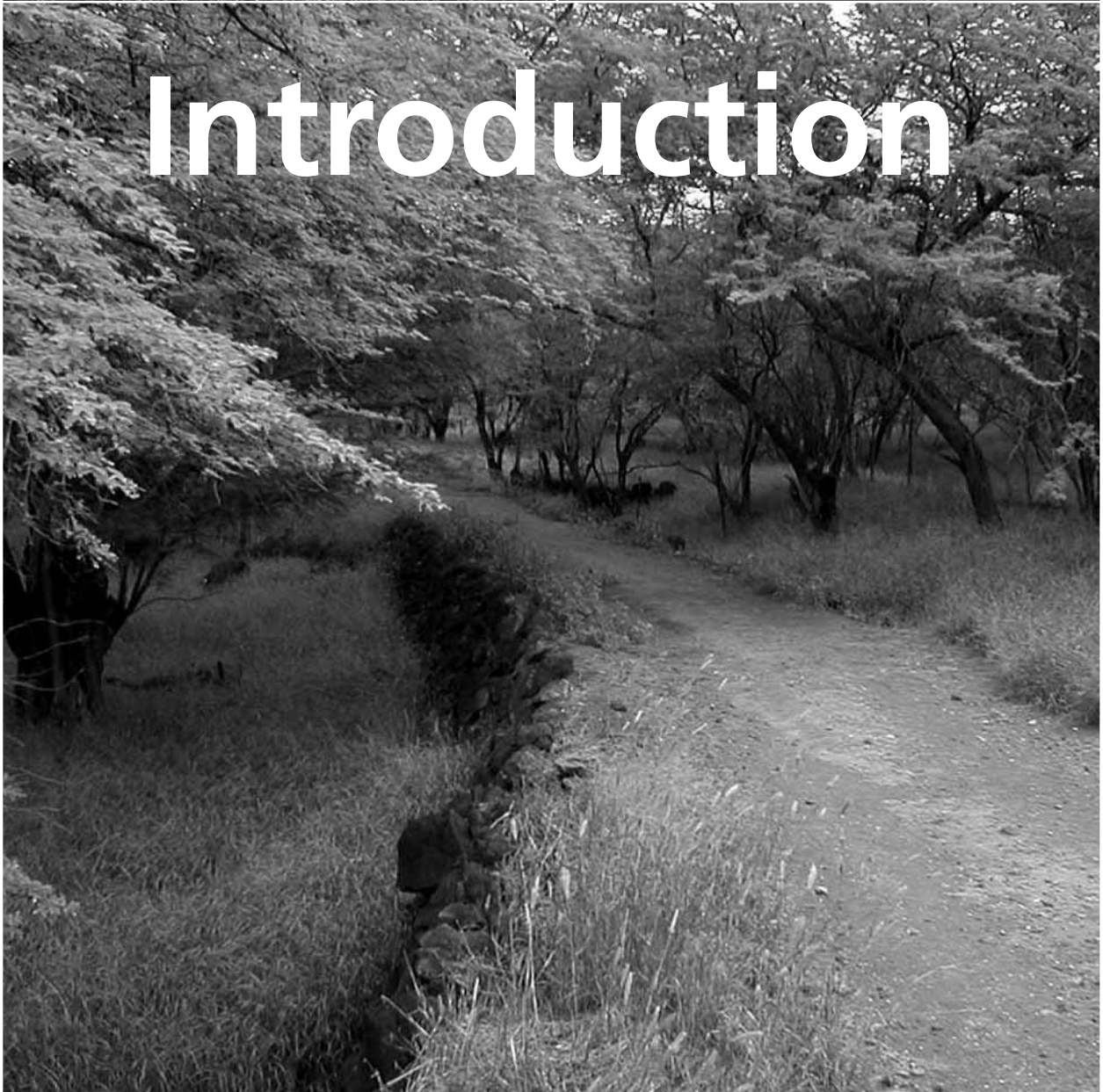
Hawai'i State Library
Bond Memorial Public Library
Hilo Public Library
Honoka'a Public Library
Kailua-Kona Public Library
Kea'au Public Library
Kealahou Public Library
Laupahoehoe Public Library
Mountain View Public Library
Na'alehu Public Library
Pahala Public Library
Thelma Parker Public Library

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, Ahupua'a 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 Kapa'au. 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 *Ka'ū 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 Pu‘uhonua o Hōnaunau NHP for about two miles to Ho‘okena 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.

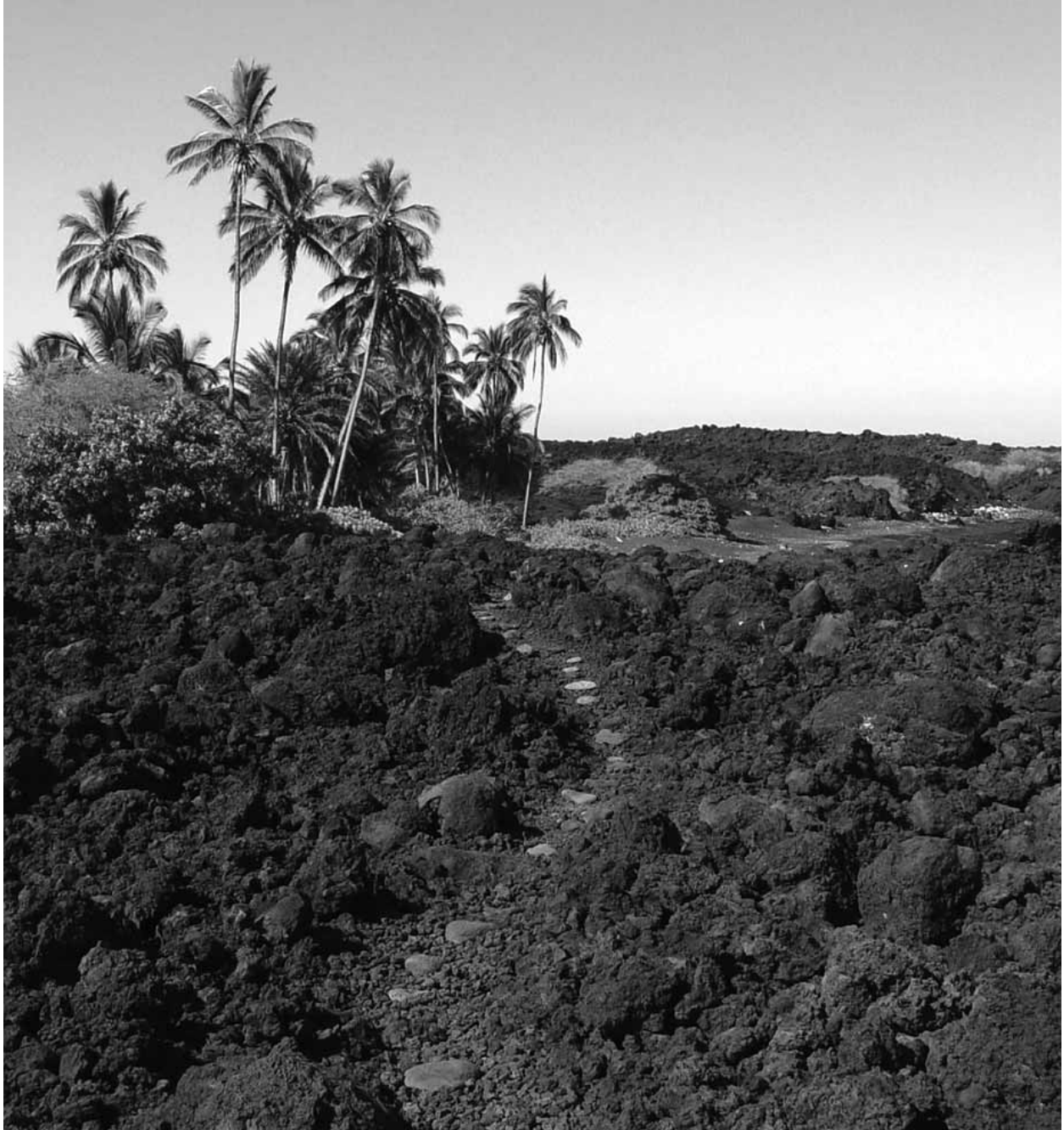
- **Trail Operations:** Several commenters felt that funding, staff, and budget were inadequate to the tasks outlined in the plan. Some wondered what the NPS would do in the event that fund raising by community-based organizations, especially the Ala Kahakai Trail Association, falls short of expectations.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



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

Table of Contents

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 ~~through~~ 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 requires a cultural survey and potential preservation or reconstruction, 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, ‘O‘oma Development)

‘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 proposed plans for ‘O‘oma 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 wire 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'uohonua 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'uohonua 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'uohonua 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 73-75 mile 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 ahupua'a 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

Landownership

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

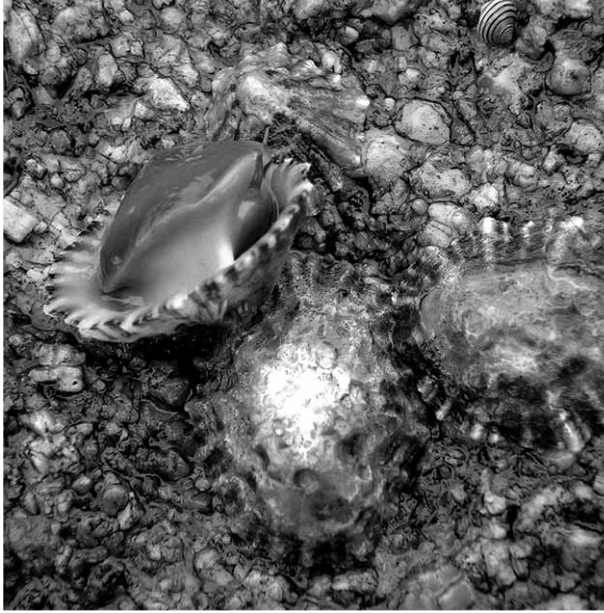
Page 259, under “The appropriate County Departments agree to:” line 7

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

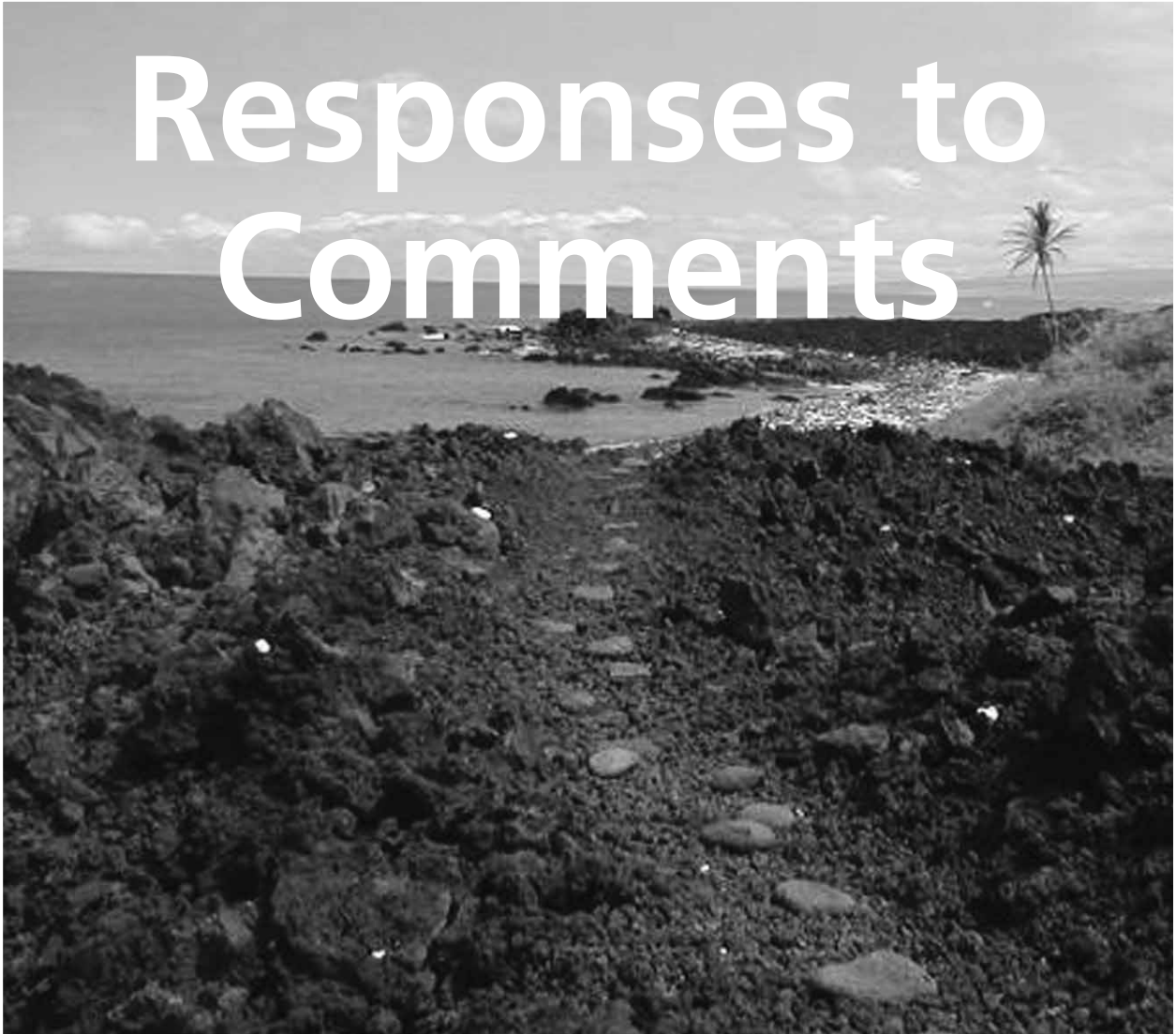
Work with the NPS to develop a system whereby project applications determined to have potential impacts on historic trails within the Ala Kahakai corridor are sent to the Ala Kahakai NHT administration for review and comment. The notification system will provide approving agencies and applicants clear 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 Ho'okena 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. Ho'okena Beach Park becomes a 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).

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 Hawai'i, 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 Hawai'i.
 - 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 (Ali'i 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 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.

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 Ho'okena 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 51 of 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'uuhonua 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



Keolonahihi, N. Kona, NPS photo

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.

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

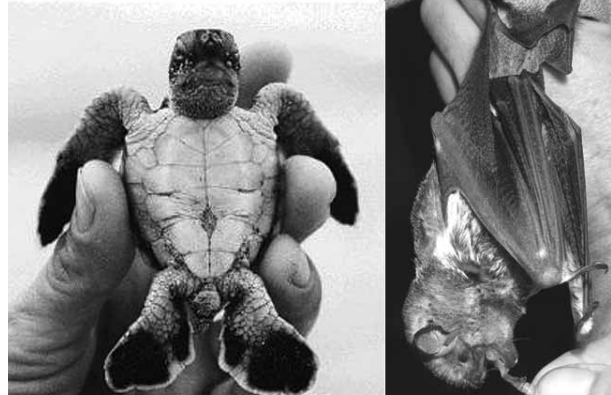
Individual comments suggested protection measures for Hawaiian hoary bats and Hawaiian hawks, restoring dryland forests and preserving native trees, standardizing resource management measures for special ecosystems along the trail route, considering the effects of erosion and soil run-off when clearing 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 Kamoā 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 Kamoā 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'uuhonua 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 Ho'okena 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 Anaeho'omalu 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 in these areas are Spencer Beach Park, Mahukona, Kapa'a. [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 Ho'okena are based on having four walk-in campsites. Two approved campsites exist within this area at Spencer Beach and Ho'okena. 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 Ho'okena. 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 be 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 Ho'okena 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 descendants. 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 Moku'ohai Battleground site as well as another possible lateral trail and another trail in the Nā ala Hele inventory. Although footpaths may exist between Moku'ohai 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.



Ka'awaloa Road, S. Kona, NPS photo