



# Copies of Comment Letters



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

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

The letters included are as follows:

### Federal

Environmental Protection Agency  
U.S. Coast Guard  
USFWS

### State

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

### County

Hawaii County Council, County of Hawaii  
(Bob Jacobson)

### Organizations

Ala Kahakai Trail Association (Roy Broggini)  
E Mau Na Ala Hele (Barbara Schaffer)  
Historic Hawaii Foundation (Kiersten  
Faulkner)  
Ho'okuleana LLC [O'oma Development]  
(Peter T. Young)  
Kamehameha Schools (Kehuewa Kikoloi)  
Ka'ū Farm and Ranch Company (Chris  
Manfredi)

Kūlana Huli Honua (Mikahala Roy)  
Peoples Advocacy for Trails Hawai'i—PATH  
(Laura Dierenfield)  
Queen Emma Land Company (Stuart Lau)  
University of Hawaii Environmental Center  
(Peter Rappa)  
Wailea Property Owner's Association  
(William T. White III)

### Individual

Deborah L. Chang  
Benjamin Konshak  
David Tarnas  
Amber Nakamura Whitehead



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

December 21, 2007

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

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

Dear Sir or Madam:

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Nova Blazej', with a long horizontal stroke extending to the right.

Nova Blazej, Manager  
Environmental Review Office

002081

Enclosure: Summary of Rating Definitions

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
Fourteenth Coast Guard District

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

16500

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

NOV 27 2017

Dear Aric Arakaki:

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

Sincerely,

A handwritten signature in black ink, appearing to read "D. V. Shepardon", followed by a horizontal line.

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



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE



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

In Reply Refer To:  
2008-TA-0102

FEB 12 2008

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

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

Dear Mr. Arakaki,

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

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

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



Mr. Aric Arakaki

2

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Leonard for". The signature is written in a cursive, flowing style.

Patrick Leonard  
Field Supervisor



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

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

December 20, 2007

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

Aloha Mr. ~~Arakaki~~: *ARIC*

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

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

*This section needs further clarification:*

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

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

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

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

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

~~“Trails included in the Na Ala Hele system must be determined to have a functional value to be included in the system”~~

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

- 3. Page 73, second paragraph - Trail Alignment**

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

- 4. Page 97, first paragraph**

~~“Within the 73 mile sections of trail, Na Ala Hele owns 21 miles has documented that approximately 21 miles 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.~~

**5. Page 192, Cumulative Impacts**

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

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

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

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

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

**8. General Comments**

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

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

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

**NAH Comments of the Draft Ala Kahakai NHT  
Comprehensive Management Plan and Environmental Impact Statement  
December 20, 2007, Page 4**

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

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

Mahalo for the opportunity to comment on the DCMPEIS.

Best Regards,



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Curt A. Cottrell  
Na Ala Hele Program Manager

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

LINDA LINGLE  
GOVERNOR OF HAWAII



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**

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

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

**RUSSELL Y. TSUJI**  
FIRST DEPUTY

**KEN C. KAWAHARA**  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
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CONSERVATION AND COASTAL LANDS  
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ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

January 15, 2008

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

LOG NO: 2008.3810  
DOC NO: 0801TS06  
Archaeology

Dear Mr. Arakaki:

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

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

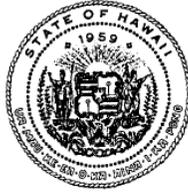
We concur, in general terms, that Alternative C is the preferred action alternative. Alternative A, no action, is not proactive enough to promote the long-term preservation or interpretation of the important cultural features along the trail, especially along those segments of trail not on NPS land.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

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

Aloha,

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

LINDA LINGLE  
GOVERNOR OF HAWAII



**STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

DIVISION OF STATE PARKS  
POST OFFICE BOX 936  
HILO, HAWAII 96721-0936

November 13, 2007

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

**RUSSELL Y. TSUJI**  
FIRST DEPUTY

**KEN C. KAMAHARA**  
DEPUTY DIRECTOR - WATER

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ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

TO: Morris M. Atta  
Land Division Acting Administrator

FROM: Glenn Y. Taguchi  
Hawaii Parks District Supt.

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

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

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

c: SP Administration

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STATE OF HAWAII

LINDA LINGLE  
GOVERNOR OF HAWAII



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STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

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

LAURA H. THIELEN  
CHAIRPERSON  
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COMMISSION ON WATER RESOURCE MANAGEMENT

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KAIHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

REF:OCCL:TM

Correspondence: HA 08-82

MEMORANDUM

DEC 10 2007

TO: Morris Atta, Acting Administrator  
Land Division

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

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

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

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

LINDA LINGLE  
GOVERNOR



BRENNON T. MORIOKA  
ACTING DIRECTOR

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

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

IN REPLY REFER TO:

STP 8.2742

January 9, 2008

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

Dear Superintendent:

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

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

1. We understand the path of the trail will need to be further researched and surveyed to determine actual conditions along the trail, path size and alignment/direction for the trail.
2. Locations where the trail path will or may cross or abut any of the lands, easements or right-of-way under our jurisdiction will need to be identified. Advance consultations with our Department and the respective affected division (airports, harbors and highways) should be done so that any impacts, conditions or requirements of use, and necessary documentations can be addressed. This would include responsibilities for work, construction, and funding of any tasks associated with implementing the path of the trail.
3. While the possibility of additional locations exist, locations where possible impacts on our transportation facilities could occur are: Kona International Airport at Keahole (KOA), State Route 160 (Ke-ala-o-Keawe Road to the City of Refuge), and Kawaihae Harbor. Specific sites at the airport and harbor will have to be identified and delineated by the National Park Service. The Draft EIS made general statements related to the trail at or around Kawaihae Harbor. Our Harbors staff looks forward to getting clarifications from the National Park Service regarding the trail going through our harbor facility. Our Airports staff noted that the trail might have been affected by construction work of certain portions of KOA Airport.

Superintendent, National Park Service  
Page 2  
January 9, 2008

STP 8.2742

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

We appreciate the opportunity to provide our comments.

Very truly yours,

*Francis Paul Keno*

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

**BOB JACOBSON**  
Councilmember

*Chair, Environmental Management Committee*  
*Vice-Chair, Finance Committee*



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

Mailing Address: 25 Aupuni Street, Suite 200  
Phone: (808) 961-8263  
Fax: (808) 961-8912  
E-Mail: [bjacobson@co.hawaii.hi.us](mailto:bjacobson@co.hawaii.hi.us)

## HAWAI'I COUNTY COUNCIL

*County of Hawai'i*

December 4, 2007

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

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

Aloha:

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

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

Mahalo,

Bob Jacobson, Member  
Hawai'i County Council

BJ/mf

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

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

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

**December 30, 2007**

**Dear Superintendent Arakaki,**

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

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

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

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

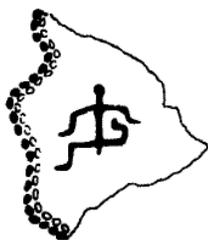
**We look forward with much Aloha and Gratitude to working with all involved organizations now and in the future as we build our capacity to bring the Trail both "back" from its history and forward into the future. Mahalo a nui loa for allowing us to be of service on this most important part of Hawaiian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

**With gratitude,**

A handwritten signature in black ink, appearing to read 'Ray Broggini', written in a cursive style.

**Ray Broggini (MD)  
Board Member  
Ala Kahakai Trail Association**

**cc. Yvonne Yarber Carter  
Keoki Carter**



**E MAU  
NA ALA HELE**  
P.O. BOX 8384  
KAMUELA, HAWAII 96743

**“To perpetuate Hawaii’s Trails for Hawaii’s People”**

30 December 2007

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

Dear Superintendent Arakaki:

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

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

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

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

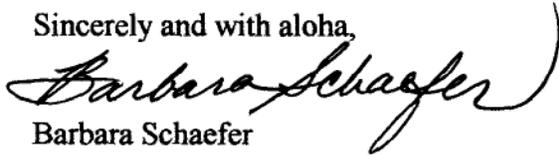
We are very pleased the Comprehensive Management Plan is nearing completion so work identifying, and opening the various trail segments to the public, can begin. We hope this process can move forward expeditiously so there will be feet on the ground on approved and accessible trail sections as soon as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

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

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

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

Sincerely and with aloha,



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

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

# HISTORIC HAWAII FOUNDATION

November 9, 2007

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

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

Dear Mr. Arakaki:

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

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

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

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

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

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



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Email [preservation@historichawaii.org](mailto:preservation@historichawaii.org) / Web [www.historichawaii.org](http://www.historichawaii.org)

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

Very truly yours,

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

Kiersten Faulkner, AICP  
Executive Director

December 24, 2007

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

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

Dear Superintendent:

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

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

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

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

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

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

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

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

The proposed plans for `O`oma will preserve the 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.

**Do well by doing good.**

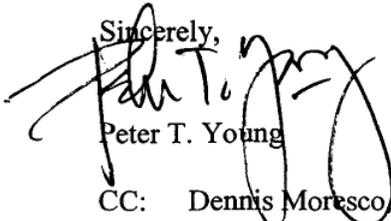
The Ala Kahakai National Historic Trail is located within the property area designated as shoreline park and coastal preserve. The 18 acres along the shoreline will be designated as a public shoreline park, and will be an extension of the beach parks planned at The Shores at Kohanaiki and NELHA. The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

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

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

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

Sincerely,



Peter T. Young

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



## KAMEHAMEHA SCHOOLS

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

December 20, 2007

Dear Superintendent of the Ala Kahakai,

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

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

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

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

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## KAMEHAMEHA SCHOOLS

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

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

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

Mahalo for your time and the opportunity to comment,

Kekuewa Kikiloi

Cultural Assets Manager  
Kamehameha Schools  
Land Assets Division

 **Ka'u**  

---

**FARM & RANCH COMPANY**

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January 17, 2008

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

Dear Aric:

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

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

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

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

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

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

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

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

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

Mahalo for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to be 'Chris Manfredi', with a long, sweeping horizontal line extending to the right.

Chris Manfredi



Pahuaikiokoakaawaloa

**Kulana Huli Honua**  
**Foundation of the Search for Wisdom**  
a Non-Profit, 501-C3 Organization

Mikahala Roy, Executive Director

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

November 5, 2007

Dear Superintendant Arakaki:

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

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

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

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

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

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those people who have inherited the care of this place. “Pono” is the condition that will guide the outcomes.

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

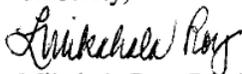
I am also vice-president of Na Kokua Kaloko Honokohau, I know that this organization will wish to make full comment on this Draft and we will be pleased to do so. As you know, kupa, or natives to Kona created the opportunity and then helped pass the law to enable the creation of the Kaloko-Honokohau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

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

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

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

Sincerely,



Mikahala Roy, President  
Kulana Huli Honua



## PATH ~ PEOPLES ADVOCACY FOR TRAILS HAWAII

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December 31, 2007

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

Aloha Kakou:

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

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

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

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

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

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

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

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

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

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

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

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

Mahalo Nui Loa,



## QUEEN EMMA LAND COMPANY

1099 Alakea St., Ste. 1100 ▪ Honolulu, HI 96813 ▪ (808) 532-6100 ▪ FAX: (808) 535-5415 ▪ www.queens.org

November 26, 2007

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

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

Dear Mr. Arakaki:

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

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

-- Preserve, protect, reestablish as necessary, and maintain a substantial portion of the ancient *ala loa* and associated resources and values;

-- Provide for a high quality experience, enjoyment and education -- guided by Native Hawaiian protocol and etiquette -- while protecting the trail's natural and cultural heritage and respecting private and community interests. (pg. 15)

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

1. In natural disasters such as an earthquake, tidal wave, erosion, and fire, what would be the trail management actions immediately prior, during, and after the disaster to protect life and property. If the disaster results in a trail section disappearing in a fully developed area, would a new trail be created in the developed area or would that section of trail cease to exist?
2. What would trail management do should man-created events result in damage to life and property. For example, what actions would the trail management take should people use the trail to access and desecrate caves located off the trail? Who is responsible to repair the cave damage and what would the various stakeholders be able to do to prevent future cave desecration?

*A Queen's Health Systems Company*

November 26, 2007

Page 2

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

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

Please contact us if there are any questions.

Sincerely,



Stuart C. Lau



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MĀNOA

December 21, 2007  
RE:0770

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

Dear Superintendent:

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

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

**General Comments**

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

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

#### **Community Vision for the Trail** (p. 15)

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

#### **Gaps in Information and Research Needs** (p. 29)

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

#### **Resource Protection** (p. 40)

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

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

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

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

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

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

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

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

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

#### **Impact Terminology** (p.141)

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

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

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

**Final Comment**

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

Sincerely,

Peter Rappa  
Environmental Review Coordinator

cc: OEQC  
James Moncur, Water Resources Research Center



October 04, 2007

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

Dear Sir:

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

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

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

Sincerely,

William T. White, III  
President  
Wailea Property Owners Association

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

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

Dear Mr. Arakaki:

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

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

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

#### Funding and Staffing

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

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

1 of 3

Ala Kahakai DCMP/EIS, Deborah Chang's Comments

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

### Historic Trail Ownership

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

### Private Landowner Incentives

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

### Permit Reviews

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

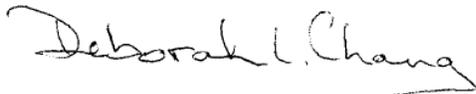
Environmental Assessments, and Environmental Impact Statements. A few of the forenamed applications require Planning Commission approval, but several of them do not.

The Ala Kahakai Trail Association

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

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

Sincerely,



Deborah L. Chang

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

November 28, 2007

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

Aloha Aric,

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

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

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

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KALOKO-HONOKOHAU NHP

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

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

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

Mahalo Nui Loa,



Benjamin Konshak  
PO Box 44576  
Kamuela, HI 96743

Cc:

Representative Mazie Hirono

Director Pacific Islands Support Office

- ✓ Superintendent Kaloko-Honokohau National Historical Park
- Superintendent Pu'uhonua o Honaunau

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

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

**To:** Aric Arakaki

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

TO: Aric Arakaki, Superintendent

FR: David Tarnas

RE: Comment on the Ala Kahakai NHT Draft Comprehensive Management Plan and EIS

Hi Aric ~

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

- 1) Overall, I recommend the Alternative C, the ahupua`a system of trails. The mauka makai connection in the ahupua`a and the connections across the ahupua`a in the moku are important culturally and environmentally.
- 2) Planning for the trail should be coordinated with the Hawaii County Planning Department's effort to prepare the Community Development Plans for North and South Kona, South Kohala and North Kohala. Coastal and mauka-makai trails are part of these plans. Please contact County Planning Director Chris Yuen for information on these plans.
- 3) Since the plan includes environmental management measures relating to anchialine pools and nearshore waters such as resource management and water quality monitoring programs, these should be coordinated with the West Hawaii Regional Fishery Management Area, which already has numerous marine protected areas along the coast, as well as the Hawaii County Planning Department and their effort to standardize the water quality monitoring programs along the coast as part of the Special Management Area permits. Please contact Dr. Bill Walsh of DLNR regarding the West Hawaii Regional Fishery Management Area, and County Planning Director Chris Yuen regarding the water quality monitoring programs.
- 4) Private landowners along the trails, including some of my own clients, such as Jacoby Development at the Kealakehe ahupua`a, and Earl Bakken at the Kiholo ahupuaa, have clearly expressed their interest in participating with the AKNHT system. But, this will require 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.
- 5) Resource management measures for special ecosystems along the trail, such as anchialine pools, dryland coastal forests, rocky shorelines, and beaches, should be standardized and consistent with the DLNR measures already in place.
- 6) Standardized signage and interpretive programs should be developed and shared with the landowners along the route so that there is a consistent system used throughout the trail system.
- 7) Involving local communities in any economic activity relating to the trail is a good idea, but there will need to be substantial assistance provided to these communities to establish sustainable organizations.
- 8) Any economic activity relating to the trail should be carefully coordinated with the Hawaii DLNR since much of the trail is in Conservation District, in which there are specific restrictions on commercial activity.
- 9) Funding for the trail and all its associated resource management and interpretive programs should come from the federal government. This will supplement the existing (but entirely inadequate) state funding.
- 10) Construction of new sections of the trail should follow a standardized design that should be shared with all the landowners along the trail to provide a consistent appearance and resource protection along the trail.

Best wishes on the implementation of the plan.

Aloha,  
David

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

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

Aloha mai,

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

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

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

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

Mahalo,



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



Manini'owali, N. Kona, NPS photo





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D-13/October 2008



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