



BRIEF SUMMARY OF PUBLIC COMMENTS RECEIVED DURING CIVIC ENGAGEMENT

Winter 2025

STUDY BACKGROUND

Ka'ena Point, on the island of O'ahu, protects some of the richest and best-preserved cultural aspects of Hawai'i's history, along with invaluable and unique environmental and natural resources. Congress authorized the Ka'ena Point National Heritage Area Feasibility Study in Public Law 117-339 (<https://www.congress.gov/117/plaws/publ339/PLAW-117publ339.pdf>), which directs the Secretary of the Interior, through the National Park Service, to evaluate the area for potential designation as a national heritage area (NHA) as part of the National Heritage Areas System. The National Park Service (NPS), working collaboratively with local stakeholders, subject matter experts, and the public, is in the process of evaluating whether Ka'ena Point has the key resources and the local support necessary for designation as a national heritage area.

An NHA is a place designated by Congress where natural, cultural, historic, and scenic resources combine to form a nationally distinctive landscape. Continued use of national heritage areas by people whose traditions helped to shape the landscape enhances their significance. National heritage areas are also lived-in landscapes where conservation is community-driven: each NHA is managed by a local organization (called a local coordinating entity) that collaborates with the community to make heritage relevant to local interests and needs. The NPS serves as a partner to each NHA, providing technical support and limited financial assistance. Decision-making remains in the hands of local people and organizations. An NHA is not a unit of the National Park System, nor is any of its land

owned or managed by the NPS, unless such land was previously set aside as a national park.

NHA studies are typically completed within three years. This study is entering its second year, and during this time the NPS has focused on information gathering and public outreach. The NPS study team will rely heavily on public engagement and input from local stakeholders to support the findings of the feasibility study. Upon completion, a study report will be transmitted to Congress describing the study findings, recommendations from the Secretary of the Interior, and any correspondence received demonstrating support for or opposition to establishing the national heritage area.

PUBLIC SCOPING PROCESS

From September to November 2024, the Ka'ena Point NHA Feasibility Study team reached out to the public through meetings and announcements to share information about the study and solicit comments about the Ka'ena Point area. On September 25, 2024, the NPS published the project page on the National Park Service's Planning, Environment, and Public Comment website (<https://parkplanning.nps.gov/projectHome.cfm?projectID=121707>) and distributed a digital newsletter. The website and newsletter were published in both English and 'Ōlelo Hawai'i.

Four public meetings were held in October 2024; 47 people attended. Virtual meetings were held on October 23 from 12:00-2:00 PM (15 attendees) and October 24 from 5:30-7:30 PM (7 attendees). Each virtual meeting began with a presentation about national heritage areas and

the study process, followed by an opportunity to ask questions and provide comments. In-person meetings on O‘ahu were held in Wai‘anae at the Kamehameha Schools Community Learning Center at Mā‘ili on October 29 from 6:00-8:00 PM (8 attendees) and in Haleiwa at the Waialua Community Association on October 30 from 6:00-8:00 PM (17 attendees). In-person meetings began with an orientation and open house with poster stations staffed by NPS representatives. This was followed by a formal presentation about national heritage areas and the study process with an opportunity to ask questions in front of all participants. The meetings concluded with another open house session. In-person meeting participants were able to offer comments during the question-and-answer session or by writing on forms provided for this purpose.

Public comment was open from September 25 to November 25, 2024. A total of 71 correspondences were received. Comments made during public meetings, including boundary suggestions drawn on maps, were incorporated into the public comment analysis. Most commenters identified themselves as unaffiliated individuals or members of various organizations or businesses not commenting on behalf of those organizations or businesses. Three correspondences were identified as official comments from Native Hawaiian Organizations (NHOs): Koa ‘Ike, Protectors of Paradise, and Papa Ola Lōkahi. The NPS also received requests for information from the State of Hawai‘i Office of Conservation and Coastal Lands and the state Nā Ala Hele Program, although no official comments were received from local, state, or federal government entities.

SUMMARY OF PUBLIC COMMENTS

General Comments on NHA Designation

A little more than half of the correspondents expressed support for NHA designation, but there were also many correspondents who expressed concerns about or opposition to designation. Most commenters—both opposed to and supportive of designation—spoke of the Ka‘ena Point ‘s significance and the desire to protect

it while preserving access to continue long-standing uses.

Of those who opposed NHA designation, most cited concerns about what such designation would mean for future management of lands within an NHA, particularly the perceived potential for increased limitations on public access. A few commenters were concerned that designation would create more visitor impacts or allow outside interests to influence management of the area.

Most commenters who supported NHA designation described the significance of natural and cultural resources, as well as intimately coupled traditions, beliefs, and lifeways that could benefit from recognition and additional resources.

Management and Access

Some comments in opposition to NHA designation expressed concern that land ownership or management would change with designation. Most who expressed opposition to an NHA felt that the area was already adequately protected. A few used the term “National Historic Site,” suggesting that there may be a misunderstanding that an NHA designation could result in the creation of a new unit of the National Park System.

Of the commenters who expressed opposition to designation of an NHA, there was an almost universal concern that designation would reduce access for the purposes of fishing, hunting, gathering, diving, recreation, and Native Hawaiian cultural practices. Some supporters of NHA designation also expressed these concerns or conditioned their support on preventing such changes. A few commenters noted that they were specifically worried that the already limited vehicle access to Ka‘ena Point would be further restricted were an NHA to become designated, which would make it more difficult for island residents, particularly those with mobility issues, to access the area. Several commenters noted that some local community members use the area for subsistence. A few commenters who were in opposition to designation noted that other fishing, hunting, gathering, and diving areas in

O‘ahu have been closed to vehicle access in the past.

Some commenters who were concerned about losing access felt that NHA designation would make some community members feel unwelcome, while others expressed skepticism that land managers would keep any promises to preserve access. One commenter who conditionally supported designation suggested that the designation would likely have community support if the study process and future management planning were transparent and gathered community input, and if the local coordinating organization were to commit to not imposing new regulations on land use.

Resources, Traditions, Customs, Beliefs, and Folklife

Several commenters noted the importance of Ka‘ena Point in Hawaiian spiritual traditions, particularly the sacred site known as Leina-a-ka-‘uhane, or the “leaping-off place of souls.” People also described the ethnographic significance of other landforms in the study area. Comments included information about the significance of several healing and ancestral sites including landing places, caves, and temples (heiau). Some commenters noted that the study area contains some of the highest density and oldest archeological sites on O‘ahu. Others noted that the study area includes ancestral burial and reburial sites. One commenter stressed that these places and stories are uniquely sacred to Native Hawaiians.

Natural resources that were identified included rocky coastlines and intact dune systems, native plants (including 11 endangered endemic taxa), habitat for seabirds and threatened green sea turtles, haul-out locations for the endangered Hawaiian monk seal, and endangered humpback whales. One commenter said that the wildlife in the area was notable for being accessible to the public.

Several commenters described the intimate relationship between the tangible resources in the study area and the beliefs, traditions, and folklife of both ancient and modern Hawaiian civilization. These include traditional uses of

plant and animal parts for lei-making, dyes, woodworking, herbal medicine, and tools. Many commenters noted that modern fishing and gathering in the area was a continuation of traditional Hawaiian land stewardship. One commenter identified surfing as an important activity that originated with early Hawaiians and continues to this day. The same commenter identified the globally significant surfing areas of the North Shore, extending to the east (Waialua side) of Ka‘ena Point.

Several opportunities to improve the quality of resources were suggested. These included funding to better regulate tour activities and vehicle access, as well as additional education about the area’s natural and cultural resources and sustainable use. Specific suggestions for infrastructure included adding dedicated paths for vehicles and people, improving signage, constructing additional restrooms, and adding shuttle services connected to parking areas. Other resource management ideas included implementing additional ecological restoration and monitoring terrestrial and marine resources, such as fisheries.

Stories and Interpretive Themes

Commenters noted that the area’s sacredness makes it a place to preserve and share the Native Hawaiian worldview of interconnectedness with the environment, through oral traditions, chants, songs, and proverbs that have been passed down through generations. Many of these stories are rooted in the landscape of Ka‘ena Point.

Several comments described how fishing and gathering allows people to participate in a long tradition of kuleana (a set of responsibilities) and lawai‘a pono (fishing in balance/harmony with the environment). Other commenters identified similar Native Hawaiian cultural values in connection to Ka‘ena Point including resilience, adaptation, subsistence, and sustainability.

Many commenters shared that their families had practiced fishing, hunting, gathering, and recreation in the area for generations. These commenters noted that Ka‘ena Point has been the setting for individuals and families to connect

with the natural world and pass on knowledge and cultural traditions.

Other themes identified in comments were the intertwining of Hawaiian history with broader themes of exploration, colonization, and industrialization. The area is also associated with movements for conservation and cultural preservation, as well as advocacy for Indigenous rights and the revitalization of Hawaiian culture and language. Commenters observed that the study area includes ranching and plantation infrastructure related to Hawai‘i’s territorial period and military installations dating to World War II.

Potential NHA Boundaries

Most commenters who expressed support for NHA designation also provided feedback on the conceptual boundary alternatives. These conceptual boundary alternatives can be viewed in the study newsletter at: [ParkPlanning - Ka‘ena Point National Heritage Area Feasibility Study Newsletter](#).

Two commenters supported concept A due to its honoring of traditional Hawaiian land division boundaries known as an ahupua‘a. A few commenters supported modifying concept A to include lands to the south in the Wai‘anae moku (ahupua‘a of Kea‘au, ‘Ohikilolo, Makua, Kahanahaiki, and Keawa‘ula), as well as lands to the east in the Waialua moku (ahupua‘a of Ka‘ena, Kealia, Kawaihapai, ‘Auku‘u, Mokulē‘ia 2, and Mokulē‘ia).

One commenter supported concept D with the addition of coastal areas within the ahupua‘a of ‘Ohikilolo and Kea‘au, while another commenter noted concept D was their second choice. One commenter offered the opinion that concept D would not work, but did not elaborate.

No comments were received regarding concepts B or C.

Other commenters offered boundary alternatives which were not initially presented by the NPS. One commenter proposed a boundary which included most of the north shore of O‘ahu from Ka‘ena Point to Haleiwa and the ahupua‘a of Waimea, while another offered the alternative of including the entire Hawaiian archipelago.

Several commenters recommended specific locations to the south of Ka‘ena Point to be included in the boundary, namely Kaneana Cave, Makua Beach, and Keawaula Bay. A few comments suggested including ocean in addition to land within the boundary.

Local Coordinating Entity

Many of the commenters who supported NHA designation suggested potential coordinating entities.

The NHO Papa Ola Lōkahi suggested that a partnership of organizations that includes at least one NHO should serve as the coordinating entity. The need for a central role for Native Hawaiian Organizations was echoed in a few other comments as well. Papa Ola Lōkahi provided a list of public and private landowners, local community and government organizations, and Hawaiian Civic Clubs as potential participants in such a partnership. One group of commenters specifically recommended the NHO Koa ‘Ike as a coordinating entity.

Other organizations suggested for a potential role in NHA coordination included the Hawai‘i Department of Land and Natural Resources, the YMCA’s Camp Erdman, Hi‘ipaka LLC (Waimea Valley), and the North Shore Community Land Trust. Several commenters noted that the interests of community fisherpersons should be represented in the structure of a local coordinating entity.

Study Process

A small number of comments stressed the importance of transparency in the study process, particularly given the distrust of government that exists among some local communities and fisherpersons. One commenter was concerned that those people would not participate in the public scoping to have their viewpoints heard.

One commenter noted that their initial opposition to NHA designation was based on their confusing NHA designation with federal management or ownership, and that the public scoping newsletter was useful for understanding the distinction.

A few commenters suggested additional sources of information about tourism, natural features, sacred sites, and traditional practices on O‘ahu that the NPS might wish to review.