



THE LANI-KAILUA BRANCH OF THE OUTDOOR CIRCLE

October 20, 2016

Re: Response to the EISPN for the Kawainui-Hamakua Master Plan Project

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Aloha,

LKOC has been actively involved with the preservation of the Kawainui Marsh since the mid 1950's. We are committed stakeholders in this effort, with no vested interest other than its preservation as a wetland and wildlife refuge, as well as a significant archaeological site, important to understanding the historical roots of pre- and post-contact human presence in Hawaii.

We do not object to having a Hawaiian cultural presence there, nor do we object to the marsh restoration aspects of the plan. In fact, we applaud these efforts.

LKOC organized restoration efforts for Ulupo Heeiau in the early 1950's, and since then has been actively involved in marsh preservation. In the 1970's and 1980's, LKOC spearheaded the formation of the Kawainui Heritage Foundation and the effort to declare Kawainui eligible for inclusion on the National Register of Historic Places. LKOC helped spearhead efforts that resulted in the 1983 Resource Management Plan. In 2005, LKOC was a signed petitioner on the Ramsar Convention declaration of Kawainui as a "Wetland of International Importance". Open spaces exist there because LKOC petitioned the city to void previously granted permits to build a light industrial park on the Wai'auia site, resulting in the State ultimately purchasing the property, and the removal of the partially constructed structures there. Cultural sites remain undisturbed because LKOC convinced the city to relocate a sewer line from inside the marsh boundary to along Kalaniana'ole Hwy. These are just a sampling of our involvement in the preservation of Kawainui Marsh.

Given our history, we feel we have earned the right to have our voices heard regarding this proposed development plan.

Here are concerns we would like to see addressed in the EIS for the Marsh Master Plan.

Marsh Hydrology/Water Quality

Kawainui-Hamakua is an integral part of the Kailua-Kapa'a watershed and is connected to a major and economically important public recreational resource - Kailua Bay - that relies on clean water.

- The EIS needs to address the marsh in its broader context as part of the entire ahupuaa, including the watershed that feeds the marsh. To date, the plan includes no discussion of performing an hydrology study on the entire marsh and its mauka water sources. The EIS should require that such a study be done in order to acquire up-to-date information on the current workings of marsh hydrology.
- Similarly, the EIS should require that an up-to-date water quality study be done for the entire marsh, prior to any construction, to better assess potential water contamination due to proposed development.
- The EIS should identify instances when water from Maunawili Stream or sources outside of the pond boundaries entered the Corps of Engineer Pond system and what management efforts have or will be implemented to prevent the interchange of water between the natural and engineered wetlands.
- The EIS should address pollution that enters the marsh from culverts and sheet flow runoff from Kapa'a Quarry Road.
- The EIS should provide data on the size, location, materials etc of the proposed buildings, parking lots, structures, launch ramps etc., in order to better analyze their potential impact on marsh hydrology and water quality.
- The EIS should address the fact that even an environmentally well designed septic system will leach contaminants over time and the Master Plan should be forward looking 50 -100 years.

Marsh Boundaries:

- The EIS needs to recognize that the riparian and upland areas abutting the marsh wetlands are an integral part of the marsh. To date, plan terminology indicates these development areas, while in the scope of the project, are 'not within the wetland', and development there is "unlikely to substantially increase pollution", and does not appear [will] have a detrimental impact on the wetlands".
- The EIS needs to recognize and address that proposed development in these areas can have a significant effect on marsh health.
- The EIS should have a Figure that shows the wetland designation boundary and a comparison/explanation of how its size and location have changed over time. Since DOFAW manages the riparian/upland forested areas, as well as the wetland area, all references to DOFAW Management Areas need more clarification.

Cultural and Educational Centers

- The EIS should explain how it determines which cultural practitioner groups or individuals will have access to Kawainui-Hamakua for traditional practices.

- If members of the public are restricted from using areas identified in the plan as areas providing for a “permanent cultural presence”, the EIS should identify the criteria used to select the “permanent cultural group or groups” and identify these areas in the plan.
- The EIS should clarify what is meant by “traditional cultural practices” and include a discussion of how these practices can be addressed in Kawainui-Hamakua without the construction of modern walled buildings that use modern materials.
- A good example of an Environmental Assessment that proposes a 'green' cultural presence, with no modern structures or parking lots, can be found for the Kaloko-Honokohau Hawaiian Cultural Center, with low-impact, open-air traditional (thatch and pole and dry-stack masonry) structures which maximize airflow and have zero-energy use shade structures, uses "zero discharge" composting toilets to keep human waste from entering natural water systems, and is a "green" facility, as it requires no water, treats waste biologically, is "zero-discharge", uses long-lasting construction material and has low power requirements (provided by solar panels). See site:
<http://parkplanning.nps.gov/document.cfm?parkID=312&projectID=15922&documentID=51479>

Wildlife Habitat

The proposed extensive footpaths encircling the marsh wetlands have the potential to adversely affect the wildlife habitat and endangered birds' nesting habits. The proposed trails will bring human beings in close proximity to previously remote nesting areas. The extent and incursion of these trails needs to be examined in more detail.

- The EIS should identify the specific areas in Kawainui-Hamakua that are "state wildlife sanctuaries" and list a variety of controls that can be used to manage access, the number of people using a site, and the type of uses allowed.
- The EIS should address whether or not, under what circumstances, and to what extent “visitors” would be allowed/permitted in the primary habitat. If access to primary habitat is regulated, what kind of regulations would be established and who would enforce the regulations?
- The Plan states that within Kawainui, access to the wildlife sanctuary areas is “restricted to the perimeter marked trails and roads, or other marked trails or roads”. The EIS should identify how it will enforce this restriction.

Archeology

The proposed extensive trails and other cultural/educational site location disturbance due to construction may be detrimental to existing and undiscovered archeological artifacts.

- The EIS should require that a complete archeological study be done for the entire marsh, including the upslope areas, prior to any development being commenced.

Canoe Launch at Kawainui State Park Reserve - Kapa’a and Kalaheo Section

- The EIS should identify the types and numbers of canoes that would be allowed to launch and what agency, organization or individual would make the decision on who could launch and/or use the facilities.
- The EIS should identify the types of "commercial" and "non-commercial" watercraft besides canoes that could be permitted to launch at that site; the number that could be allowed to launch; and who and what agency or organization would make that decision.

Management, Maintenance, and Commercial Access

- The EIS should clarify whether non-profit or for-profit contractors could be granted permits for management and maintenance operations in Kawainui-Hamakua.
- The EIS should clarify whether limits could be placed on the size of these groups, and what type of oversight, if any, DOFAW/DSP staff would have on their work.
- The EIS should identify the types of commercial permits allowed in Kawainui -Hamakua and the number of permits allowed per day per site.

Thank you for allowing this opportunity for input and comment on the Kawainui-Hamakua Master Plan Project.

We look forward to continuing as a consulting party on the project.

Sincerely,
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