



## THE LANI - KAILUA OUTDOOR CIRCLE

*“Keeping Kailua Clean, Green and Beautiful since 1948!”*

September 16, 2019

Suzanne D. Case  
Chairperson, Department of Land and Natural Resources  
Kalanimoku Building  
1151 Punchbowl St.  
Honolulu, HI 96813

Aloha Chairperson Case,

The Lani-Kailua Outdoor Circle (LKOC) would like to inform you about our position on the proposed **Kawainui-Hamakua Marsh Master Plan**, as detailed in the FEIS soon to be released for BLNR review.

For the record, LKOC developed its own comprehensive **Alternative Kawainui-Hamakua Marsh Master Plan**, (referred to here as the **LKOC Alternative Plan**), detailing our proposed improvements in the Marsh complex. We have been informed that our plan, along with two others, is to be included in the FEIS Section 2, “Other Alternatives Considered”, for your consideration during BLNR review.

According to the December 2017 DEIS sent out for public review, the following was stated about the objectives of the Master Plan regarding

- the **mission** of the agencies preparing the Kawainui-Hamakua Master Plan, and
- what the **proposed improvements** are to be to achieve that mission.

Agency Missions:

- To sustain and enhance the natural and cultural resources associated with this area
- Increase public access
- Increase outdoor recreational opportunities

Proposed improvements fall into three categories:

- Natural resource management
- Cultural resource management (support traditional Hawaiian cultural practices in the area)
- Educational and recreational initiatives

Of major concern to us is that, in the above, no mention is made of requiring a “**permanent cultural presence**” within the Marsh, nor of requiring modern facilities to support that presence. We are not sure when a “permanent cultural presence”, in the form of permanent physical facilities on state land for non-state employees, became part of the defined mission, but that now **appears to be a major focus** in the Plan. This is evidenced by the rejection of our LKOC Alternative Plan because it proposes limiting improvements to environmentally-friendly structures and improvement, and therefore “*does not provide ... reasonable and practicable opportunities for non-profit organizations to establish a permanent presence to conduct cultural practices, educational programs and stewardship of the area*” (FEIS p. 2-140).

Additionally, **public access** does not mean open access at all times, and recreational opportunities does not mean all forms of recreation at all sites, but that, too, now appears to be a **major determining factor** regarding the improvements deemed “acceptable” in the DEIS. This is evidenced by the rejection of our LKOC Alternative Plan because its recommendations for managed public access do “*not provide reasonable public access for all*” (FEIS p. 2-140), and “*do not support LWCF requirements for public access and outdoor recreational opportunities for all*” (FEIS p. 2-140).

It is LKOC’s contention that:

- **Permanent facilities not intended to house state employees** engaged in achieving the stated mission and objectives of the Master Plan should be removed.
- **Public education, cultural practices, wetland restoration and public access and recreation can be accomplished without permanent modern-day structures** and environmentally impactful hardscape improvements.
- **Public access must be managed** to avoid negative impacts on the wetlands, watershed, waterbird habitat, and archeological sites. While some perimeter trails and observation decks have been eliminated from the original plan, we strongly feel the **long-term management and monitoring of visitor access to the marsh needs clear definition in any Master Plan**, rather than statements such as “*the analysis in the DEIS shows proposed [Master Plan] improvements would not have an adverse effect on these areas*” (FEIS p. 2-140) and “*Specific best management practices and strategies used would be determined during the design phase of improvements*”.
- **Improvements to the natural resource management** of the Marsh must include protection of wetland water quality and maintenance of the long-term flood protection function of the levy. **These need aggressive attention in any Master Plan**, with detailed steps defined, including hydrological studies, rather than the currently stated position “*DOFAW and DSP have no jurisdiction over activities occurring [outside the boundaries of the marsh]*”.

Our LKOC Alternative Plan provides a reasonable and necessary **framework to accomplish all of the above**. It includes specific steps to achieve these goals and is attached here for your review. It is also included in Appendix A of the DEIS.

We recognize that there is a fundamental difference in the magnitude and nature of improvements that the State, under DLNR-DOFAW/DSP, is planning for Kawainui-Hamakua Marsh, versus what LKOC is proposing. However, we feel that our LKOC Alternative Plan is **consistent with the stated objectives** of the Master Plan and presents a detailed moderate and measured approach to achieving them.

We hope you will consider the LKOC Alternative Plan when reviewing the FEIS. We feel the improvements it proposes make it a better plan for the future of the Kawainui-Hamakua wetland and the State of Hawai’i.

Sincerely,

Diane Harding  
Lani-Kailua Outdoor Circle President