

October 25, 2019

TO: Board of Land and Natural Resources

RE: FEIS for Kawainui-Hamakua Marsh Master Plan (Agenda Item C.2)

Aloha,

The Lani-Kailua Outdoor Circle (LKOC) has historically been involved in the protection of the natural and cultural resources of Kawainui. For the past 70 years, we have worked with State and local organizations to gain recognition of its historic properties and been engaged in stewardship activities and education outreach to alert the public of environmental threats to these resources.

Modifications to the Master Plan that DLNR offers in response to the community's and LKOC's concerns, do not address our primary need which is the removal of permanent modern facilities upslope of the wetland that are not essential to DOFAW resource management responsibilities, are not required by Ramsar, and are not essential to fulfilling the requirements of the Land Water Conservation Act.

The current Master Plan will provide more public access to an endangered water bird habitat and an already degraded ecosystem. However, the Master Plan's insistence that Ramsar and the Land Water Conservation Fund require the level of recreational, educational, and cultural presence (in the form of modern facilities) being proposed is unfounded. Exceptions would and should be allowed for wildlife sanctuaries and wetlands as small as Kawainui-Hamakua.

LKOC has long promoted public access to the marsh for traditional cultural practices, as well as preservation, restoration, and educational activities. However, the growing public use that would occur over time at the proposed facilities will threaten rather than sustain endangered wildlife and diminish rather than improve water quality in Kawainui-Hamakua.

Of specific concern to LKOC is the inclusion in the FEIS of the permanent cultural and educational facilities proposed in upslope areas of the wetland. Those buildings, parking lots, lawns, restroom facilities, leach fields, etc. will add to the alteration and hardening of the existing environment. Over time they will have a cumulative negative impact on the marsh, impeding efforts by the State to improve water quality and flood control.

LKOC strongly supports student education, cultural practices, wetland restoration and public access and recreation, but is convinced that these objectives can better be accomplished without permanent modern-day structures. To that end, we developed our comprehensive "LKOC Alternative Plan", which has been included in the FEIS as an Alternative Plan Considered. Our plan is included as an attachment to this email.

We believe our alternative plan is consistent with the stated objectives of the Master Plan and presents a moderate and measured approach to achieving them.

However, the FEIS has rejected our plan's recommendations at the following sites:

Our Wai'auia proposal for less impactful hardscape and structures, has been dismissed with the comment:

*"Wai'auia needs wetland restoration and does not provide important habitat for endangered waterbirds. [LKOC's] suggested alternative of a hale or pavilion located here instead would be inappropriate and does not support cultural practices and other activities. Such a structure provides superficial support for temporary access and does not adequately support the project need."* (pg. 2-142).

It is our contention that the 3 proposed modern structures totaling 7000 square feet of floor space (pg. 2-85) that directly abut the waterbird habitat (Figure 2-12; pg. 2-83) will impact endangered water birds

using this area. The projected increase of 1,730 people per month (pg. 2-103) will impact traffic due to the proximity of Wai'auia to the entrance intersection of Kailua.

Our LKOC Alternative Plan's site modification proposals for Nā Pōhaku/Pōhakea Education Center, which also called for less impactful hardscape and more traditional Hawaiian structures, were rejected with the comment:

*“Overall, the size and footprint of this education center would not have a significant impact on the environment.”* (pg. 2-141)

It is our contention that the proposed 5,600 square feet of floor space (pg. 2-69) and the projected 6,000 visitors per month (pg. 2-105) to the proposed Education Center and its public access trails will have damaging impacts on the adjacent wetland and flood plain.

In addition, LKOC's Alternative Plan calls for the removal of plans to construct a 10,000 square foot Cultural Complex (pg. 2-75) on a former Kapa'a landfill site (pg. 2-141) that would serve 400 people per month (pg. 2-103). Instead, we, supports reforestation at this location. The Master Plan provides for cultural activities and opportunities for stewardship, education and recreation in other areas within Kawainui.

We believe the proposed hardscape “improvements”, along with the increased use of the above sites, would have environmental impacts that are not adequately addressed in the Plan.

The natural, cultural and scenic capital of Kawainui are public trust resources that benefit the people of the State. Harm to these resources must be avoided when other options are available.

Therefore, we respectfully ask that you return the submission of the FEIS to DLNR, DOFAW/DSP for further consideration of the removal of non-essential “modern-day” structures and for reapplication for Acceptance, or, that you recommend to DLNR that a substantive and thorough Supplemental EIS be generated for the cultural and educational centers being proposed at Kapa'a, Wai'auia, and Pohakea.

Sincerely,  
The Lani-Kailua Outdoor Circle  
Pauline MacNeil, LKOC Board of Directors Public Affairs Chairwoman