



COMMUNITY MEETING NOTES

SOUTH POINT RESOURCES MANAGEMENT PLAN

August 16, 2016

6:30 p.m. to 8:30 p.m.

Nā‘ālehu Elementary and Middle School Cafeteria

Attendance: Seventy-nine participants signed in at the meeting of whom 30 identified themselves as DHHL beneficiaries. Please refer to the end of the meeting notes for a list of attendees. Several participants did not sign in.

DHHL Staff: Kahana Albinio, Andrew Choy, Louis Hao, Kaleo Manuel

Consultant: Gabrielle Sham (Townscape, Inc.)

Purpose of this meeting:

The purpose of the meeting was to gather input and feedback on the Draft South Point Resources Management Plan.

The meeting began at 6:30 p.m. with Auntie Leolani Hao providing the opening prayer. Then, Mr. Andrew Choy welcomed the participants and thanked them for attending the meeting. He introduced the DHHL staff members and consultant. Ms. Gabrielle Sham presented a slideshow that provided an overview of the draft management plan.

Questions/comments from meeting participants on the draft management plan presentation:

Access

- Like Volcano National Park Service, families who access the area for food are given a pass so no need to pay. What IDs are you going to accept as “local resident”?
- If you close access/gate from 6 a.m. to 6 p.m., what happens to local families who fish at night? Need to feed families. Need to access for night fishing.
- Closing at night will affect camping and fishing.
- Think of alternative plan for blocking the access at night.
- 90% of fishermen go fishing during the day/night based on weather.
- Generation to generation fishing, camping down there. What about that?
- Illegal to block off access to boat ramp.
- Can’t limit fishermen to a certain time; fishermen use the boat depending on the tide.
- Is the plan going to close down the boat ramp? There are fishermen that need to access boat ramp.
- What are your plans to control access from Ka‘ala‘alu? Without managing that access, this plan is not going to work.

- Allow special permit for fishermen. Vandalism occurs. Need to lock gate at certain times for security.
- With a special permit...I working with weather. How does permit work? Kūpuna need access for health and well-being. How long will it take to get a permit? If it takes too long, it prevents people from fishing.
- If the gate is locked at night, what about for emergency access? Is there a landing area for helicopters?
- Fishermen- want to park as close as possible. Provide “kupuna parking.” Now I gotta carry my gear down. Inconvenient.
- We are here to protect this area- so keiki can get back there.
- On mainland federal land, free access with Indian card. Remember people that live here.
- Would the gate limit access to all? Especially shoreline.
- Get people born and raised here. Get them a “card” for no charge/access.
- There are multiple accesses at South Point for different purposes. Need to assess impacts of this plan to these purposes.

Security/Enforcement

- What is the fee amount?
- Should have 24-hour security; revenue from fee should provide 24-hour security.
- What are the credentials for security? Why are we going to have someone not from Ka‘ū to enforce and secure? Contract local company for security.
- Is it possible for 24-hour security to educate and inform? Educate new comers and locals from other places don’t respect place/area.
- Security can help with education.
- Have 24-hour security...it limits “freedom” to access.
- We need security down there. Stop vandalism, tires slashed.
- We have Association. They can volunteer time to enforce. Use community to enforce. Take care as ‘ohana, work together and monitor.
- What would be the job of security? Would they only scold them?
- Security should not give special privileges. Got to be reputable.
- Change security to 24/7.
- Need security for liability.

Signage/Sanitary Amenities

- The plan recommends putting in bathrooms at the fish hoist and barracks, but toilets should be put in by boat ramp and Green Sand Beach too.
- ATVs running rampant. Please take “Kapu” off signs. No one knows what that means except for Hawaiians.
- People need permission from DHHL to put signs. No one cannot just put up signs. Who gave you permission to put up signs [to another participant]?

Economic Opportunities

- The plan says that the service road to be used exclusively by one entity, but more groups of people should be able to access the road.
- Does the shuttling have to be bid upon? Have you received bids?
- I don't have enough money to bid. Let community decide.
- Give local people here a chance. We know the roads and know where to protect.
- Locals always lose. We cannot beat people from outside. Give preference to Ka'ū.
- I see investments and revenue made. What comes back to Ka'ū? Don't use Ka'ū people. What amount of money goes back to Ka'ū people?
- Clearly state in the plan that money generated will be spent on the Ka'ū people.
- In North America, there are legislature measures that require hiring a percentage of locals/minority.
- If procurement processes could specify items such as using "locally sourced" materials, what else "can" procurement do? Can we ensure that money stays here?
- What is the specifics of the training program?
- Is there access to grants for training?
- If I have to go college to learn business, takes too long. I miss out on opportunities.
- This is a National Historic Landmark. Too much emphasis on economics. He ali'i ka 'āina, he kauwā ke kanaka.
- We want all revenues so that it sustains Kalae. Give 2 to 5% to State.
- How do you prioritize Ka'ū issues? There are many issues. Would the resources generated be used for Ka'ū like water?
- I don't want homesteaders to play politics. There are many things that need funding Statewide. We need to make sure and guarantee that a percentage goes to Ka'ū. Plan can provide resources. Stipulate in writing we want a percentage of money generated here at South Point.
- Keep funding in Ka'ū.
- If homesteading is priority, why use outsiders for vending? Use beneficiaries.
- We don't want a percentage of revenue. We want all the revenue. Pay for resource management and homestead. This could fund it all.

Education

- We need to educate people when they go there. Presence. If no presence, this isn't going to work.
- Put a Welcome Center- educate tourists.
- Make Visitor Center a higher priority. It would solve many existing issues such as traffic, toilet usage, and educating visitors.
- Talk about education...South Point sits in Kamā'oa ahupua'a. This plan should be called Kamā'oa, not just South Point.

General

- Consult with DLNR and Coast Guard since they own some of the land near the fish hoist.
- A lot of concerns is stop the bleeding.

- Regarding the HHC meeting in Hilo, a participant suggested checking with the County (Ron Whitmore) to provide a satellite meeting in Ka‘ū for folks who cannot make it to Hilo.
- How many of the 25 awarded lots have lessees living on them? How many of them are at tonight’s meeting?
- Make sure we never repeat the mo‘olelo about the greedy chief Hala‘ea.
- Make sure SHPD is on board with the plan.
- Can you narrow down amount of paths down at South Point?
- Talk with County about road improvements on South Point Road.
- Not appropriate to plan without looking at other plans, such as the Ka‘ū Community Development Plan.
- Is the trail planned consistent with Na Ala Hele Trail?
- Can you have a cap on number of visitors?
- When Green Sands fall down, will you still care about the land?
- Air tours: FAA routing air tours; huge impact on everyone.
- Rock wall would be more permanent solution. Build those, old way to do it.
- Was there specific catalyst that started this conversation?
- I would prefer no management at all- only leads to pilikia.
- DHHL need to take care of problem, control ATV.
- Do what is right for the community.
- Document archaeological sites.
- We got to look into what is in the best interest for the ‘āina, where we gather food, as a community we put that in there, I support the plan. 1st step to manage area, not in it as individuals making money; our children can learn from this.

The meeting was adjourned around 8:30 p.m.

Meeting Attendees (from sign-in sheet)

1. Joseph Akiu Sr.
2. Marian Alcosiba
3. R. Alcosiba
4. Michael Alexander
5. Lesly Awong*
6. Cynthia Baji*
7. Christine Beck
8. Bruce Boyd
9. Chris Brown
10. Richard Creagan
11. Shalan Crysedale
12. Ian Chun
13. Kama Dancil
14. Melkinley (sp?) K. Davis Jr.*
15. Elsa K. Dedman
16. Kalani DeGito*
17. Keoni Fox*
18. Carol Flores
19. Jashia Freitas-Moses
20. Ben Gauereen (sp?)
21. Claudine Gomez*
22. Colleen Gundaker*
23. Pernell Hanoa*
24. Sophia Hanoa
25. Kathy Hashimoto
26. Dave Kaawa*
27. Garry Kaawa*
28. Nohealani Kaawa
29. Tommy Kaawa
30. Christine Kaehuaea
31. Bea Kailiawa
32. Doley Kailiawa*
33. Darryl K. Kaluau
34. Jackie Kaluau*
35. Clyde Kaneshiro
36. Dean Kaniho*
37. Tissy Kaniho
38. Yvonne Ke
39. Charmaine Keanu*
40. Maile Keanu
41. Adrienne Kekoa Davis*
42. Jeffrey Kekoa*
43. William Kekoa Jr.*
44. Corinna Kuahiwinui
45. [illegible] Kuahiwinui*
46. David Kuahiwinui

47. Hazel Kuahiwinui*
48. Eddie Kuahiwinui*
49. Paul Kuahiwinui
50. Rodney Kuahiwinui Sr.
51. Rodney Kuahiwinui Jr.
52. Stella Kuahiwinui*
53. Susan Kuahiwinui Jr.
54. Saydi Llanes
55. Joni Mae Makuakane-Jarrell*
56. Nona Makuakane
57. Paul Makuakane
58. Gilbert Medeiros Jr.*
59. David Meru (sp?)*
60. Officer B. Morishita
61. Ella M. McComber*
62. Donald D. McComber*
63. Sherraine Nihipali Sesson
64. Cindy Orlando
65. Noela Pritchard*
66. Edward Rau
67. John R. Repogle
68. Guy Sesson
69. Jody St. Joseph
70. David Taylor
71. Keola Taylor
72. Noelle Taylor
73. Richard Taylor
74. Harlen P. Tayamen*
75. Kim Viloría*
76. Darlyne P. Vierra
77. Walter Wong Yuen
78. Melvin Yokoyama
79. Bradley K. Young*

* Indicates participants who identified themselves as DHHL beneficiaries on the sign-in sheet

Comments received after the August 16, 2016 community meeting are provided below.

Date	Comments
8/9/2016	<p>Mahalo for your hard work in designing a plan for the restoration and protection of Ka Lae, the famous South Point of Ka'u.</p> <p>I am very impressed by the draft plan. I would like to make a suggestion which might not have been mentioned in the plan. I would like to suggest that the DHHL look into the possibility of extending water service to South Point, i.e., bringing water down to SP from the top of South Point Road by underground pipe. The Federal Government might be willing to finance this since it's a "shovel-ready" project that will benefit tens of thousands of people every year, including native Hawaiians.</p> <p>Having fresh water at South Point will allow for proper, sanitary toilets and for the creation of a small oasis visitor center at the old WWII barracks located near the boat ramp. Fresh water will allow the establishment of a Ka'u themed cafe serving locally grown coffee and quality Ka'u food products such as pastries, fresh fruit, and local organic honey. You could have outdoor seating in a tropical garden. Local musicians and hula dancers could provide entertainment. The creation of modern visitor facilities at South Point can only be made possible with a reliable supply of fresh water. These facilities will create dozens of jobs for Ka'u residents.</p> <p>I look forward to your reply.</p> <p>Best of luck in your work on the South Point Project.</p>
8/14/2016	<p>Thank you for your email. I understand that the South Point Project poses a lot of challenges. Thank you for your hard work.</p> <p>In my first email I forgot to mention that I didn't find anything about bicycle traffic in the draft plan. There will be many visitors who will want to ride mountain bikes to the Green Sand Beach. Will there be a designated lane for them on either the main road or the walking path? If they are forced to travel on the road, they will have a bad experience because of all the dust created by vehicular traffic and having to share a narrow road with large vehicles. I hope the material used for the road will keep dust at a minimum. Right now the red dust (powder) is horrible; in some places it's 6" deep. I just hiked to the Green Sand Beach in June and am well aware of the condition of the roads. I also noticed that some cement barriers at the start of the road had been pushed to the side, or maybe were never placed in a position to block vehicular traffic.</p> <p>Thanks for considering my suggestions.</p>

South Point Resources Management Plan: Community Meeting Notes August 16, 2016

	Mahalo & aloha.
8/16/2016	Remember this: you can please some of the people some of the time, you cannot please all of the people all if the time!
8/16/2016	<p>I walked out of your meeting tonight very upset! I thought this meeting was suppose to be about protecting an restoring the land. But what I hear is all about making money. Before you can put an info structure up you need to protect and restore the land if the land is not restored you will have nothing to see. I live in Ka'u all my life born an raised! An I'm worried about the fishing grounds I was raised on from fishing to picking opihi an crabing to throwing net to even diving. This is something I want my kids to learn on! We travel from south point to Kaalualu how do expect my kids an I to carry all our fishing supplies coolers an food! All the way in an all the way back out! My second concern your trying to put a time frame on the boat ramp, I will give u an example what's going to happen if the gate open from 6 to 6 but one morning high tide is at 5 an by the time 6 comes the tide is low! South point is unpredictable how do you expect me to launch my boat on low tide the boat ramp down there is not like every other boat ramp you can only launch an come in with what the tide is. Only experience fisher men's from Ka'u know how to get in an out on that ramp safely! In order for my full opinion I would like to you to call me it would be better that I verbally talk to you rather then me email you! Please consider all I say an please give me a call! I do have 262 acres lease land from DHHL down south point that goes to the waters edge changes will happen with or without my opinion but I feel I could help make change for the better.</p> <p>Thank you!</p>
8/16/2016	<p>You folks did a great job at the Kau Meeting. You had new comers that haven't gone or participated in any of the meetings through out the year. There's always the ones that don't really care, just leave it open and never mind preserving it. The gal that spoke up and said she didn't want presence at South Point was a family member of the shuttlers that occupy the point area.</p> <p>Just a couple things, don't lose sight of the real issue, cleaning and preserving South Point. My boy graduated from Kamhameha at Kea'au, and his heart is in keeping the Aina pure.</p> <p>Preserving that area and cleaning is the most important. The vending will come in later. We believe any vendor needs liability insurance and valid driver licenses and vehicle insurance, those people at South Point do it carry any such insurances. They bring food with out operating in a clean kitchen! Watch out hep A!</p> <p>We will be putting a bid for concessions at South Point, when the time is right. We need to know what you folks expect from us. We need you folks to manage that land , look where self management has gotten our Aina.</p> <p>Thanking you all, your team did a great job!</p> <p>Thank you.</p>
8/17/2016	Aloha to you all, I wanted very much to say this last night but did

not want to color the plan. Thank you very much for all your effort and hard work! It is a good plan and it addresses all the major issues that were brought to your attention as to why we needed help to protect our sacred Kalae. There are of course some things that need a little tweaking or minor additions or subtractions but nothing that can not be addressed as the need arises! It is a well thought out plan that allows for additions or enhancements to it as time moves forward. You all reacted to our concerns in a very timely manner; you saw the gravity of human impact on the land, cultural sites, ecosystem and the natural resources of the area for this, again, I thank from the bottom of my heart.

Back to work:

1)The Elderly getting to fishing spots: provide hand carts for their okana. two wheeled garden cart?

2)Emergency evacuation? put in the one way spikes on exist road. if you try enter you get flat tires.

3)I would definitely look in to the Air Tours curtailment. When at Kalae people want and need to experience the aina in all it's glory and vastness not be listening to or being watched by air traffic. Man needs Nature to be healthy!

4) The camping issue is addressed by one way spikes on road, out but not in. I feel the camping issue can be addressed as the plan moves along and as needs arise. It would at some point be an addition to the plan. A rough plan should work for now.

5) Parking Fee: you called it; Entrance fee is what it is. Everyone must pay something. Local Ka`u residents would have a \$20.00 yearly immediate family pass. DHHL beneficiaries would receive a \$15.00 dollar check once a year to purchase their Kalae Beneficiary Yearly Pass. Use or no use their individual call. Everyone else pays \$10.00 per vehicle entry. It is going to take funds to protect and maintain this Sacred Wahipana. Local fishermen these are the commercial people would be allowed the \$25.00 yearly fee. People are funny ; if you give them a puppy they won't take care of as they would if you charged them even \$10.00 for it. Same with a pocket knife; you always make the person you are gifting it to give you some money even if it's only .05 cents. You say it's for luck but it is to draw attention to the fact that you just received something special. Same with entrance fees!!!

6) Funds; I do believe Kalae is capable of generating substantial revenue. Capitol will be required to get this off the ground. If it can be donated that would be lovely. You may need to find a philanthropist who could put down the capitol and be repaid without interest over a period of time. Possibly a conservation organization. Or could DHHL just fund it and be repaid and that be a special fund for this type of project else where on DHHL lands in the State. I feel that once the establishing of the Preserve is done the huge the at least 90% of the funds should go back into the Kamaoa DHHL property development and distribution of lands to

	<p>beneficiaries. I believe DHHL has an incredible opportunity to do something so spectacular for the Aina, the</p> <p>beneficiaries, the people of the State of Hawaii and Visitors that at this moment is incomprehensible to most. That young man last night talking about the shuttles and by the time he is educated all the spots will be gone. That's what he knows of Kalae; shuttles and roads everywhere and I need to get mine. Where as my memory of Kalae is one road we stayed on because it was not our land; it was very wild and covered in vegetation depending on weather and season it was green or brown. I believe for the sake of the Aina, our Kahuna want to see the Aina become what it once was and this is totally doable with Aloha Aina and time.</p> <p>Again thank you so much for this opportunity to be part of this great undertaking.</p>
<p>8/17/2016</p>	<p>My Name is [REDACTED] my great grandfather was [REDACTED] and pres of legislature and minister of Finance my Family, Kekoa & ka'upu are Hawaiian</p> <p>it seems between outside culture and our own state county gov there is an increasing limitation of Hawaiians to Hawaiian Lands</p> <p>The idea of enclosing South Point and Charging for entrance and limiting access flies in the face of Native Hawaiian Gathering Rights</p> <p>the Aina doesn't need more government fences and fee's</p> <p>aloha and mahalo</p>
<p>8/17/2016</p>	<p>I glanced on the South Point plans & was wondering is there any Hawaiian Cultural right to access with-out paying fees? Is it DHHL obligation to help out its Hawaiian citizens & community? I didn't go to the DHHL meeting in Naalehu but those who went cleared up some of my questions. The access is from 6AM to 6PM theirs also good night fishing around the hoist area, will DHHL allow night fishing in the future following the Mahina? I did see in the plan the access road DHHL plan to build hopefully it's close to fishing coastline areas but the hiking path looks closer to shoreline. I see the plan allows for camping but not near the coast line to fish, maybe in the future designate an area on shoreline to camp & fish. I notice the plan is more of a tourist sight just like Volcano National park even they allow access at night, I am for the plan just oppose the charges & time of access. Maybe in the plan DHHL can add an addendums for local access outside the operating hours for Hawaiian Cultural right to access case by case basis & keep a tracking system who goes in & out.</p>

	<p>DHHL can put a time limit for night fishing at least locals can access the fishing areas.</p>
<p>8/18/2016</p>	<p>I appreciate the timely response after looking more into the plan cost wasn't much of a concern. Hopefully night access can be resolved. I know some that went to the meeting was concerned about \$ & invest in the Community. I hope in the future when revenues are increased DHHL can support the Local community organizations. Overall I am all for this plan & preserving Hawaiian Historic Site.</p>
<p>8/26/2016</p>	<p>Thanks for all the work that you have done.</p> <p>I like the toll booth, the parking, the gate with security personnel, regulating vehicle traffic, closing of the gate after hours will help.</p> <p>Installing toilets is a big plus for health concerns.</p> <p>I do not think that shuttling tourist should be one of the the main focus on this management plan.</p> <p>Kaleo mentioned the money from the shuttle will go in to a general fund, so what good does that do for Ka'u.</p> <p>The dept should allow only eco tours instead of shuttle, everybody walks in and out.</p> <p>There will be at least 90 % less impact on our fragile eco system.</p> <p>Can a non profit do the eco tours and give 100% of revenue to benefit Ka'u?</p> <p>Protecting and preserving our natural and cultural resources were the most important concerns of our community in the two meetings I held last year.</p> <p>I would prefer that the dept focus on how, or what is the first steps in working with SHPD to the surveying, locating and then protection of historical, archaeological, and cultural sites. Then focus on on the preservation of these sites for future generations.</p> <p>The dept. needs to develop policies for Kama oa so they can be enforced by the security personnel, Ka'u police, sheriff dept. or DLNR enforcement.</p> <p>The dept needs to be in control by setting these rules/policies and be consistent in the enforcement.</p> <p>At our association meeting this past Wednesday August 24 a member asked me to do a letter to the Dept and commissioners to kick out the illegal shuttle people. They made their family members park at the barracks.</p> <p>I hear a lot of complaints but about them blocking the road to kaulana while they stop tourist traffic.</p>

	<p>A member mentions their house being stoned at night after the memorial day blocking of the road to Mahana.</p> <p>Many times you guys mention about helping Beneficiaries start their own businesses. Only two of the shuttle guys are beneficiaries the rest are not by blood quantum.</p> <p>Beneficiaries: 50% Hawaiian, Hawaiian On The Waitlist, A Lessee</p> <p>There may be other true Beneficiaries from Ka'u who may want to do a tour group.</p> <p>I would like Kaleo's or your input about our association doing a letter to the Dept and Commissioners to kick out the illegal shuttle operation?</p> <p>If Ka'u Hawaiian Home Lands Association needs to be the bad guys in this situation then we the members may have to deal with the repercussion.</p>
9/1/2016	<p>When making plans for DHHL the Dept. should not make plans for DLNR trust lands. They should focus on maintaining lands under DHHL so that beneficiaries will know which lands they are beneficiaries of.</p> <p>The land above millineum high tide of 50 ft. is or should be managed by DLNR as well as the boat ramp and the fishing hoist. The cost to manage these lands will take away from DHHL funds. DLNR should manage these lands or funding from DLNR should be given to DHHL to manage these lands.</p> <p>The parking area is good. This will keep vehicles only in a certain area. The road to Mahana should not be used due to erosion from vehicles on lands that DHHL manages for beneficiaries. Gates and security staff will help alleviate the erosion problem.</p> <p>A trail should be put in place or planned with the Ala Kahakai Trail that the Dept. of Interior is planning to have from Upolu Pt. to HVNP. This will help to cut the cost for DHHL.</p> <p>The Hawaiian Home Lands Commissioners should be provided with more information before accepting this plan that DHHL is proposing. There are many loose ends that need to be answered.</p> <p>When will DHHL start fulfilling their responsibility to the beneficiaries by putting them on the land.</p> <p>"He ali'i ka 'aina; he kauwa ke kanaka" The land is a chief, man is it's servant.</p>
9/1/2016	<p>See attached comments (4 pages) from National Park Service, Hawai'i Volcanoes National Park.</p>
9/2/2016	<p>I would like to submit the following comments on the subject plan:</p> <ol style="list-style-type: none"> 1. As stipulated in multiple statutes and case law DHHL has the primary responsibility for stewardship and security of most of the lands in the management area. Deficiencies in management were described and recommendations for improvements were made in a previous referenced report

released approximately thirty years ago, yet few if any of the recommendations have been implemented. During this time rapidly increasing unregulated public use of these lands has occurred and DHHL has failed to adapt and meet its basic trust responsibilities. This has resulted in severe degradation of resources, poor sanitation, increasing health and safety hazards and exposures the agency and State of Hawaii to significant liabilities. Therefore, critical elements of the the plan must include an assessment of the factors causing this chronic management lapse and corrective measures to improve management, oversight and accountability.

2. The plan and its development process appears to lack any engagement with adjacent property owners or coordination with other agencies that have planning and management responsibilities. For example, there was no apparent communication with the County of Hawaii and no reference the recently completed Comprehensive Development Plan (CDP) for the District of Kau that addresses the South Point area. This is a major deficiency in the plan.

3. It is unclear what the boundaries of the management plan are, and how they were set.

4. Data presented on the status of natural resources, including but not limited to that for endangered species based on outdated and reports and probably inaccurate. For example, the critically endangered ohai plant, *Sesbania tomentosa*, described as present is now probably extinct in this area.

5. A new comprehensive survey of fauna and flora should be conducted.

6. Maximum priority should be assigned to identifying and protecting the remaining pockets of threatened and endangered species from off road vehicles and poaching. Species nearing extinction and cannot wait for action.

7. The plan only proposes collection of sewage and solid wastes and hauling them off site for disposal. The plan should include waste avoidance and minimization, and consider alternate, more sustainable management methods such as composting toilets.

8. It is probably unethical and unlawful for the state to set race-based contracting and procurement preferences for Native Hawaiians. However, the procurement system can and should establish criteria and contract specifications that would benefit local people and help to meet goals for improving sustainability and land stewardship. Examples could include preferences for locally sourced products and services; materials that are recyclable and/or have recycled material content, low emitting equipment and use of native plants in landscaping.

	<p>9. I agree that establishing control of the site and implementing measures to reduce off-road vehicle damage should be highest priorities. However, placing entry gates and eventually guards could have unintended consequences. Such personnel must have the skills, knowledge, equipment and authority to enforce applicable laws and regulations. Without this such a “security presence” may actually increase liabilities.</p> <p>10. At the present time given the total lack of DHHL staffing at South Point achieving the most of the goals of the Plan may be impossible. Until staffing can be hired and engaged DHHL should consider use of volunteers for many of the implementation activities, particularly educating visitors. Many local people are interested in preserving this area and would be willing to help.</p> <p>11. Contact should be made with tourism agencies to ensure that correct information about Green Sands Beach, it’s accessibility issues and preparations that visitors need to take is presented.</p> <p>12. The plan should include a map showing ownership of the site and surrounding parcels.</p> <p>Thank you for the opportunity to comment. Please contact me if you have questions.</p>
9/2/2016	See attached comments (8 pages) dated September 2, 2016.



United States Department of the Interior

NATIONAL PARK SERVICE

Hawai'i Volcanoes National Park
Post Office Box 52
Hawaii National Park, Hawai'i 96718



IN REPLY REFER TO:
HAVO I.D. (L7621)

September 1, 2016

Mr. Andrew Choy
DHHL Planning Office
PO Box 1879
Honolulu, HI 96805

RE: South Point Resources Management Plan

Dear Mr. Choy,

Thank you for opportunity to review and comment on the draft South Point Resources Management Plan.

We recommend that best management practices be included in project specifications to minimize the potential for introduction and spread of invasive species during implementation of the plan. We recommend that the best management practices include sanitation procedures for ensuring vehicles, equipment, and materials are free of invasive species, including invasive ants (such as, little fire ants and others), coqui frogs, fungus, and invasive plants. We are including standard operating procedures that we use at the park, for your information.

If any night lighting is necessary, we recommend that dark sky lighting protocols be followed. This will protect threatened and endangered animals such as the green sea turtle and hawksbill sea turtle, as well as nocturnal seabirds that may be transiting the area, such as the endangered Hawaiian petrel, the threatened Newell's shearwater, and the band-rumped storm-petrel (candidate for listing). While the seabird species may not occur on the plan area, they do fly to and from nesting colonies after dark and could be disoriented by artificial lights that are not properly shielded. In order to protect night skies and night-active animal species, it is recommended that only full cut-off, amber (560 nm or longer wavelength), downward directional lighting be considered for this project if lighting is necessary.

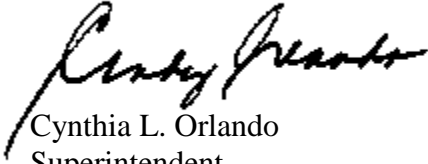
An excellent resource for dark sky friendly lighting can be found at the following website:
<http://www.kauai-seabirdhcp.info/lighting-homes-businesses/>

In the South Point Resources Management Plan, we suggest that you consider soundscapes and viewsheds and set desired conditions for these important resources. This will allow you to manage potential sources of impact, such as vehicles and aircraft, and develop mitigation measures to reduce those impacts. For example, air tour companies are currently advertising

flights over Mahana Bay. If desired conditions are outlined and the impacts exceed the desired conditions, DHHL can work with the companies to make changes to reduce the impacts and protect those resources.

If you have questions on our comments, please contact Danielle Foster, Environmental Protection Specialist, at (808) 985-6073 or danielle_foster@nps.gov. Please include the park on the mailing list for future notifications regarding this plan. We look forward to working with you in the future on jointly shared resources of concern.

Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia L. Orlando". The signature is written in a cursive style with a large initial "C".

Cynthia L. Orlando
Superintendent

Enclosure

Invasive Pest Prevention Standard Operating Procedures (SOPs)

This document lists protocols for preventing the introduction of harmful invasive pests including coqui, ants, weeds, and rapid ohia death into Hawai'i Volcanoes National Park. It is the project leader's, contractor's, or concessioner's responsibility to ensure compliance with these protocols.

- 1. All work vehicles, machinery, and equipment must be clean and free of debris prior to entering the park.**
 - a. Vehicles, machinery, and equipment must be thoroughly pressure washed and visibly free of mud, dirt, plant debris, frogs and frog eggs, insects and other debris. A hot water wash is preferred. Areas of particular concern include bumpers, grills, hood compartments, areas under the battery, wheel wells, undercarriage, cabs, and truck beds.
 - b. The interior and exterior of vehicles, machinery, and equipment must be free of rubbish and food. The interiors of vehicles and the cabs of machinery must be vacuumed clean. Floor mats will be sanitized with a solution of >70% isopropyl alcohol or a freshly mixed 10% bleach solution.
 - c. All work vehicles, machinery, and equipment may be subject to inspection.
 - d. Any vehicles, machinery, and equipment that do not pass inspection will be turned away.
 - e. Vehicles, machinery, and equipment leaving the park for any reason must be cleaned prior to re-entry into the park, and may require re-inspection at the park's discretion.

- 2. Inspection of work vehicles, machinery, and equipment for invasive ants prior to entering the park, or in a predetermined location in the park.**
 - a. In addition to visual inspection for plant debris, insects, soil, frog and frog eggs, testing for invasive ants should be conducted prior to entry into the park.
 - b. Test for invasive ants by placing chopsticks baited with a dab of peanut butter and jelly for 30 minutes to 1 hour throughout the equipment being tested. About 6 chopsticks will be used to test most personal vehicles and trucks, larger vehicles and heavy machinery may require up to 10-20 baits. Baits will be placed in the shade, inside the cab, engine compartment, and truck bed if applicable. Please note baits are only good for detection and do not control ants, and the bait will not be left in the vehicle for over 1 hour as this may attract ants from beyond the area of concern.
 - c. Any ants found will be collected, bagged and labelled for identification, and the equipment will not be allowed to enter the park until it is sanitized and re-tested following a resting period. Infested vehicles will be sanitized following recommendations by the Hawaii Ant Lab (<http://www.littlefireants.com/>) or other ant control expert and in accordance with all State and Federal laws. Control records will be required to confirm treatment. Treatment is the responsibility of the equipment or vehicle owner.
 - d. Gravel, building materials, or other equipment such as portable buildings will also be tested, using the same method as above, however, baited chopsticks will be placed every 10-20 feet around the area, in the shade, and the immediate surrounding area will be searched for 2 minutes for ants. These monitoring stations must be left out for 1 hour, and any ants found will be collected for identification. The vehicle base yard and quarries may also be tested using these methods if deemed necessary by the park.
 - e. The park reserves the right to conduct additional tests for ants at any time during the course of the project.

3. Base yards and staging areas inside and outside the park must be kept free of invasive pests

- a. Base yards and staging areas may be inspected for invasive pests at the beginning of the project.
- b. Pest control records may be requested anytime at the park's discretion.
- c. Project vehicles or equipment stored outside of a base yard or staging area, such as a private residence, should be kept in a pest free area. Such vehicles or equipment may be subject to additional inspection as described in (1d) above and will be turned away if infested.

4. All cutting tools must be sanitized to prevent rapid ohia death (ROD)

- a. All cutting tools, including machetes, chainsaws, and loppers must be sanitized to remove visible dirt and other contaminants prior to entry into the park, and when moving to a new project area in the park. Tools may be sanitized using a solution of >70% isopropyl alcohol or a freshly mixed 10% bleach solution. One minute after sanitizing, you may apply an oil based lubricant to chainsaw chains or other metallic parts to prevent corrosion.
- b. Only dedicated tools and chainsaws will be used to sample known or suspected ROD infected trees.
- c. Vehicles, machinery, and equipment must be cleaned as described in (1) above.

5. Imported firewood:

- a. All firewood imported into the park must be sourced from a park approved site free of ROD, invasive weeds, coqui and ants.

6. For individuals who work in the field:

- a. **Before going into the field**, visually inspect and clean your clothes, boots, pack, radio harness, tools and other personal gear and equipment, for seeds, soil, plant parts, insects, and other debris. A small brush is handy for cleaning boots, equipment and gear. Soles of shoes should be sanitized using a solution of >70% isopropyl alcohol or a freshly mixed 10% bleach solution.
- b. **Immediately after returning from the field**, visually inspect and clean your clothes, boots, pack, radio harness, tools and other personnel gear and equipment, for seeds, soil, plant parts, insects, and other debris. Soles of shoes should be sanitized using a solution of >70% isopropyl alcohol or a freshly mixed 10% bleach solution.

Scheduling an inspection for a park approved project:

Projects may be required to provide their own trained inspectors and to document records of inspection. Requests for inspections should be made via email to david_benitez@nps.gov and should include the park project lead and contracting officer. Requests must be made a minimum of 3 business days prior to inspection. We may be unable to accommodate requests made on shorter notice, though you may contact the following staff via email to try to arrange an inspection. Please make sure to also copy your park project lead on this correspondence.

1-) David_Benitez@nps.gov – 985-6085

2-) Bobby_Mattos@nps.gov – 985-6097

3-) Fred_Aiona@nps.gov – 985-6084

4-) Jon_Makaike@nps.gov - 985-6097

September 2, 2016

Andrew Choy
State of Hawaii, DHHL
Planning Office
PO Box 1879
Honolulu, HI 96805
Via email: andrew.h.choy@hawaii.gov

RE: Comments to South Point Resources Management Plan Public Review Draft

Dear Mr. Choy,

This letter is in response to the draft resources management plan dated May 16, 2016.

We applaud efforts by the Department to protect and preserve the natural and cultural resources of Ka Lae. The Ka'u community has been waiting many years for action and enforcement by the Department and during this time, we have witnessed the desecration and slow, painful deterioration of this sacred and storied 'aina. When I hear stories of kupuna who speak of its beauty and cultural significance through mo'olelo, it brings tears to my eyes to know that we have failed them. For within the past twenty years, Ka Lae has become an unregulated attraction for tourists who have not been educated before visiting a treasured wahi pana. Ka Lae has become an area of exploitation by individuals who care only about selfish economic interests without any regard for the land and its resources. Ka Lae has become a playground for off-road enthusiasts and sports fishermen who show no regard for our 'iwi kupuna, fragile ecosystems and the community's subsistence lifestyle. There are no warning signs, restroom facilities, waste receptacles or safety measures to guard against loss of resources and human life. Here at Ka Lae, there are endless examples of daily damage to this wahi pana and we all suffer the consequences.

Native Hawaiian Historian, Edward Kanahale wrote an essay, "The Significance of Wahi Pana" as the introduction to [Ancient Sites of O'ahu](#) in 1991 which explained the deep connection between the land and the identity of kanaka maoli:

"For native Hawaiians, a place tells us who we are and who is our extended family. A place gives us our history, the history of our clan, and the history of our ancestors. We are able to look at a place and tie in human events that affect us and our loved ones. A place gives us a feeling of stability and of belonging to our family -those living and those who have passed on. A place gives us a sense of well-being and of acceptance of all who have experienced that place. A wahi pana is, therefore, a place of spiritual power which links Hawaiians to our past and our future."

For my family, Ka Lae is a part of our 'ohana. Ka Lae is a kupuna who is calling out to us for help and we bear the responsibility of protection as we would any living member of our family. From this familial relationship, we gain knowledge, strength and guidance as native Hawaiian descendants and cultural practitioners. As Mr. Kanahale explained, wahi pana such as Ka Lae are our connection to our past and our future.

This plan is an important first step forward to protecting what is remaining. We must take immediate action so that the land can heal and in taking care of the land, the people of Ka'u will in turn provide for their own health and well being.

"He ali'i ka 'aina, he kauwa ke kanaka."
The land is chief, the people are its servants.

This traditional saying further underlines the relationship between the land and its people by recognizing that kanaka need the land for sustenance. Ka Lae is a place where the Ka'u community must continue to honor this relationship because it is part of our cultural identity. By attending to the health of Ka Lae, we can also heal our community, our families and ourselves. In order to initiate the healing process, we must develop and implement a plan which includes not only a solution to end further desecration and damage but also an action plan to initiate restoration and rehabilitation. Therefore, it is our expectation that this plan should focus on two main issues: 1) protection of the 'aina through enforcement and 2) perpetuation of its resources through restoration activities. Throughout my review of the recommendations and goals discussed in this plan, I applied these Hawaiian principles as guidelines. Therefore, my comments specifically reflect the plan's ability to protect and perpetuate this relationship between the 'aina and the Ka'u community.

The Executive Summary clearly states that the intent of the plan was to "guide future actions to steward the land and resources of this area." However, much of the plan focuses on economic opportunities at Ka Lae and developments which will facilitate use of the land as a tourist attraction. We understand that the Department has been hindered by a lack of State funding and every management plan needs to address a means for financial support. However, we were disappointed by the plan's strong focus on economic development and activities which did not directly contribute to stewardship of the land and resources. We must call attention to the fact that this is an area considered sacred to the Ka'u people. The Department has a fiduciary responsibility to protect resources on the property including cultural sites, historic sites, trails, burials and endangered species all of which are protected by State and Federal law. Besides its listing as a National Historic Landmark, portions of the area fall within the State Conservation District and Special Management Area which limit uses and activities on the property through the Hawaii Revised Statutes and County Land Use Ordinances.

Furthermore, besides prioritizing the need for vehicular access management, the plan falls short of identifying immediate methods to restore and protect important cultural sites and natural resources. This priority seems lost in the discussions on parking fees, service roads and legitimizing current business operations. In the development of a stewardship plan, we had expected that the Department would have consulted with agencies who actively protect natural and cultural resources such as State Historic Preservation Department, Office of Hawaiian Affairs, US Fish & Wildlife Service, Department of Land and Natural Resources (Office of Conservation and Coastal Lands, Na Ala Hele), National Park Service (NPA Ala Kahakai, National Landmarks Program Office), Hawaii Plant Extinction Prevention Program, US Coast Guard, etc. Many are eager to assist after witnessing the many years of damage. All of these agencies have a role in the protection of Ka Lae and its resources. Yet, the plan does not describe any efforts to collaborate with these agencies or any other environmental or cultural preservation organizations in the drafting of this plan. Without

a strong commitment to follow through with the resource restoration and protection measures, we are concerned that the Department will struggle to accomplish these goals. The high costs and challenges associated with any archaeological and biological studies could lead to further delays. As a result, without a thorough understanding of our resources, we cannot develop solid preservation and biological recovery plans to mitigate impacts from continued activities on the property. It is irresponsible to discuss continued use of the property for public purpose and possible economic use without this resource knowledge and the protocols to protect.

The plan identified the need “to gain site control by managing vehicle access” as its main priority. We agree with this determination and we hope that the Department will consider implementing actions to meet this objective as soon as possible. If further consultation or studies are required to implement the plan, we hope that the Department will at least hire security to designate parking areas and to stop the continued use of off-road vehicles until more permanent measures can be instituted. Despite pressure from fishermen, we should not allow for unregulated access on a 24-hour basis until controls are in place. I will discuss ideas regarding after-hours boat ramp access later in this response letter. Time is of the essence for with every passing day, another set of wheels, another ignorant visitor, another unexpected wildfire and another unregulated fishing tournament can lead to irreparable damage. In order for the plan to be successful, we need a strong commitment from the Department to implement this portion of the plan as soon as possible.

The plan lists six priority projects.

1 – Provide sanitary amenities and signage

We agree with the proposal to install additional portable toilets and waste receptacles near the fish hoist and barracks area. The “carry in, carry out” policy is not realistic. In the future, the Department should consider adding waste receptacles and portable toilets at Kaulana Bay since it is a ¼ mile away from the barracks. Kaulana Bay is becoming more popular with local families due to the overwhelming number of visitors at Punaluu Black Sand Beach.

In regards to the signage, we note that the plan has allowed for one large entrance sign and twelve (12) regulatory signs. Because of its importance, we would appreciate an opportunity for additional consultation regarding the signage options and specific placement within Ka Lae. We definitely recommend placement of signs prohibiting off-road driving at areas where the pavement ends near the barracks, fishing hoist and Kaulana Bay. Hazard signs near Kaulana Bay, Pinao Bay, Green Sands and the point should be added to warn visitors of dangerous surf, undertow, and no lifeguards on site. We have witnessed many visitors being caught off-guard at the point by large unsuspecting waves which are formed by the convergence of the two currents. If no immediate interpretive or educational signage will be installed due to cost and the need for SHPD approval, we request small permanent placards to be placed near cultural sites and endangered plant populations which include “Kapu, Please Keep Out” and where necessary, the historic site warning language, “Historic sites are protected under state law. Violation could result in a \$20,000 fine. (Chapter 6E-11, Hawaii Revised Statutes) DLNR-SHPD (808) 692-8015.” Some sites which fall outside of the National Historic Landmark boundaries may be excluded from strict SHPD oversight; thereby, allowing for some flexibility with signage installation. As an alternative, interpretation and educational information regarding resources at Ka Lae can be included on visitor brochures.

In addition to signage, we recommend that the Department install emergency life rings and flotation device stations at the fishing hoist, Pinao Bay, Kaulana Bay and Green Sands.

2 – Manage vehicle access

Vehicular access into Ka Lae must be regulated. We agree that this should be the Department's top priority. We ask that the Department investigate all road ownership and access rights before selecting the final location for any security barrier gate or security guard shack. The gate placement should take into account natural barriers or other fencing to prohibit individuals from driving around the gate during after hours. A parking pass should be provided to each vehicle with instructions to park at either the fishing hoist or the barracks. There is no need for security to be staffed at the two parking lots if these instructions are provided at the security shack and appropriate signage is placed at the two lots. Curbing and mobile concrete block can be added easily near the barracks to create the parking lot and avoid the need for a permanent lot attendant. Parking near the fishing hoist area can be flexible as long as vehicles are not driving past any proposed signage. Any vehicles which do not follow the rules should be cited and the owners should be fined. The roles of the three staff should be to serve as both security and park ranger. All three should have some cultural and environmental knowledge of the area so that they can provide some basic education and assess daily impacts and threats to these resources. While one staff person should be manning the guard shack, the other two should be patrolling the property using either bike or ATV type vehicles on designated, unimproved pathways. The staff should be monitoring all visitors to ensure compliance with the rules. At several times throughout the day, staff should conduct patrols out to Green Sands and beyond to Ka'alu'alu to monitor for compliance and to address any emergencies or reports of violations. With an ATV, these staff could easily pick up trash from additional receptacles at Green Sands and Kaulana Bay. In addition, the Department must collaborate with DOCARE to enforce fishing rules and other violations at Ka Lae.

In order for the plan to be successful, access from Ka'alu'alu needs to be controlled immediately. We strongly recommend that the Department install gates and signage to prohibit all vehicular access from this access point. Even if the area cannot be physically secured, warnings and notices of violation can be a useful deterrent. If collaboration is needed with Kamehameha Schools, we encourage the Department to initiate those discussions now.

Trucks with boat trailers should be allowed to park at Kaulana Bay. However, due to the ¼ mile distance from the barracks and the need to prevent further soil erosion and off-road driving, the Department should consider paving the road to the boat ramp in the future. Public parking in the boat ramp area should be considered once the road is paved. We strongly oppose any vehicular access to Green Sands other than security/patrol staff, occasional volunteer stewardship organizations and emergency vehicles. All other access to Green Sands should be pedestrian only. A locked gate with adjoining concrete barriers should be installed to block the road leading from Kaulana Bay to Green Sands.

Vehicular access to the entire area must be prohibited after-hours until the Department has control over the property. This is the only way to protect the resources from continued damage. At the community meeting on August 16, many local fishermen complained about the gate access after-hours and the need to walk in to their favorite fishing spots. By prohibiting after-hours vehicular access, the plan may indirectly help to replenish marine resources which is a partial solution to the "unlimited taking" which is currently practiced. Under the former ahupua'a management system, only those from the respective ahupua'a could fish and gather from this coastline. The traditional

system supported subsistence living for ahupua'a families and those tenants recognized the value of conservation and stewardship. The open access system today facilitates unrestricted taking of marine resources and deprives the local community of food. Furthermore, tournaments and sports fishing enthusiasts vie for maximum yields in an effort to catch the biggest and largest amount of fish. While some may argue that they have been fishing this way for years, it was not always this way and the practice is not sustainable. Everyone must make sacrifices now to preserve the area's natural resources for our future generations. The decision to allow for continued 24-hour pedestrian access provides a balance between urgent resource protection and cultural/gathering rights. Shoreline fishermen must remain on paved roads and park at designated areas.

The possibility of allowing after-hours access for fishermen using the Kaulana boat ramp should be studied further. We agree that at a minimum, these individuals should be required to obtain an annual permit from the Department for a specific vehicle. Upon request, the Department may want to consider providing a gate combo which changes weekly. Another consideration is for the permit holders to pay a deposit for a special key which uses a remote identification sensor to note the individual accessing a gate and the exact time. This type of key system is used at many remote locations throughout the State. Only permitted fishermen with trailers should be considered for after-hours vehicle access to the Kaulana boat ramp.

3 – Institute a parking fee

We agree with the need for a parking fee. However, if possible, Ka'u residents and volunteer stewards should be allowed free entrance. If these qualifications cannot be verified through a Drivers License or other identification, then maybe the Department should consider a kama'aina rate or a discounted annual pass. The monies collected should be compiled in a monthly report and uploaded to the Department website for public access. The Department may wish to include expenses as well on these reports. This transparency will allow the community to understand what monies are being raised at Ka Lae and how the monies are being allocated. We strongly recommend that a specific percentage of the revenue be allocated directly towards resource management restoration projects. These monies can be used by the Department for direct measures such as educational signage, cultural site barriers, cultural/environmental studies or native plant habitat restoration. Another percentage of the monies should be distributed as grants to non-profit groups who perform stewardship. The Department should not rely solely on outside agencies to provide financial support for these restoration projects. It is important that the Department set these guidelines; otherwise the monies can be easily reallocated to other projects and districts. More importantly, this reinvestment into the protection and preservation of resources is essential for the health of Ka Lae and with this commitment, you will earn the trust of the community.

4 – Plan, design and construct a service road and a pedestrian path with resting shelters to Mehana

It is important to note that Ka Lae is a cultural and historic landmark. Although the area may be popular with tourists and social media, it should not be developed or promoted as a tourist attraction. The spirit of Ka Lae and its many amazing qualities will continue to attract tourists and we have a responsibility to mitigate the impacts of visitors. However, we are not responsible for developing Ka Lae to enhance the visitor experience and we should not be distracted by economic interests. The need to cater to the visitor industry is a common pitfall here in the islands. The Department identified the following community vision for South Point

as “a self-sustaining, healthy and safe community where the ‘āina—inclusive of the people and resources within it—and native Hawaiian culture and values thrive.” Development of a service road does not fit this vision. Furthermore any such development would go against the goals, policies and standards of the County General Plan, Ka’u Community Development Plan, Conservation District and Coastal Zone Management Program. This type of development and use would definitely trigger the need for archaeological and biological studies. Significant challenges and concerns from the community and other agencies should be expected during the Environmental Impact Statement (EIS) review process.

While we oppose any commercial development, we value the importance of visitor education. There is an opportunity to educate visitors about the cultural significance of Ka Lae but this exchange can be achieved through other means. For instance, the natural setting of Ka Lae should be respected as much as possible in order to maintain its cultural and natural landscape. Development of any road or structures will take away from this natural setting. Rather than construct a physical pedestrian path, we propose use of signage, interactive maps and trail markers to create a designated trail within cultural sites around Ka Lae. The trail should extend further along the coastline connecting Ha’uke’uke to Kalalea to Kaulana Bay to Green Sands and beyond to Ka’alu’alu. We strongly recommend that the Department consult with Na Ala Hele and NPS Ala Kahakai to design a trail which follows existing historic trails as much as possible. All public access to Green Sands and beyond to Ka’alu’alu should be pedestrian only. Some may argue that this will limit the amount of visitors who can access these places but this should be considered a benefit as it will dramatically reduce impacts on the area’s resources. For example, the resources of Kalalau Valley on Kauai are somewhat protected from overuse due to the difficulty of traversing the Kalalau Trail.

The plan compares the proposed shuttle service to the use of golf carts which shuttle visitors at Waimea Valley, Oahu. We do not feel that this comparison is appropriate since Waimea Valley is considered a tourist attraction and the property is used for commercial purposes which include hosting weddings and other events. The park has been utilized for this purpose for years and there are protocols in place to protect the valley’s resources in a controlled environment with adequate facilities. Ka Lae is much different because we lack facilities and environmental controls. In addition, the resources are already severely degraded from human activities and we have not yet proven that we are responsible stewards of the land.

In addition, it would be a waste of financial resources to pay for any constructed road, trails or shelters. Despite the construction costs, this infrastructure will also require maintenance and the impacts will only add to the burden on our environmental resources. There is no direct return on investment to be gained from this infrastructure. Ka Lae is already a popular destination for visitors and they already patronize the illegal parking, shuttle and concession vendors. A designated, unimproved roadway from Kaulana to Green Sands and Ka’alu’alu should be identified to allow for both security/ranger patrols on ATV vehicles as well as emergency response vehicles and community stewardship groups. The selected path should be one whose use will have the least impacts to the environment. It should be clearly marked using signs and other existing roadways should be restored to their natural state using natural materials and native vegetation.

After so many years of abuse and neglect, we need to assume our roles as guardians and stewards before we have the right to ask for anything in return from the 'aina. Any development of Ka Lae which does not directly contribute to either the 1) protection of the 'aina through enforcement and 2) perpetuation of its resources through restoration activities should not be considered at this time. Let us use this opportunity to protect and restore rather than exploit for financial gain. Any consideration of a service road to Green Sands will only distract the Department and community from our main objective which is the health of the 'aina.

5 – Provide training and technical assistance to local people to become legal business entities
Once again, we are losing sight of the vision of this “resource management” plan. We strongly oppose any developments in the area which will allow for further economic use of the wahi pana. We concur with the need for parking fees but we do not support economic enterprises in an area designated as a National Historic Landmark, Conservation District and Special Management Area. Furthermore, as noted at the community meeting, the State of Hawaii laws regarding procurement would allow for any legal business to participate in the permitting process for vending at Ka Lae. Any exclusive permit opportunity to allow for a shuttle service would need to be available to the general public. It is unrealistic to think that by training beneficiaries to become licensed in the State of Hawaii, we can help them to be more competitive in any statewide bidding process. Ka Lae is already being abused by individuals who are profiteering from its resources and the lack of Department enforcement. We risk further hewa by opening up Ka Lae even further to profit-driven corporations. Efforts to promote economic self-sufficiency are appreciated but these should be applied to lessees who have pastoral or agricultural lots.

6 – Restore and protect important cultural sites and natural resources.
As a National Historic Landmark and wahi pana for the Ka'u community, Ka Lae deserves a stronger commitment towards restoration and protection of the cultural and natural resources. If the Department allows tourism on the property to continue, the plan must commit to installation of interpretive signage at cultural sites. Any concerns from SHPD need to be addressed immediately since the education provided by the signage assists with resource protection. Interpretive signage which conveys the history and significance of Ka Lae also generates a sense of pride for the community. It is not clear why SHPD is requiring an AIS for interpretive signage within the historical landmark boundaries; yet, they are not maintaining the same requirement for regulatory signage. If soil disturbance is an issue, the Department should consider using an above ground application for signage support. Endangered plant habitation areas need to be fenced immediately to allow for protection and restoration. Populations of the endangered 'ohai, *Sesbania Tomentosa*, are critically low and it is unlikely that they will recover without considerable human intervention including establishment of new out-planting areas. As mentioned previously, a portion of the revenues generated from parking must be allocated specifically towards stewardship. The Department should facilitate stewardship agreements now with community and environmental organizations. In the past, the Department has upheld barriers to stewardship such as requiring general liability insurance and right-of-entry agreements. While such requirements are reasonable, the Department has ignored unauthorized commercial operations and other illegal activities on the property for years. An Archaeological Inventory Survey, Preservation Plan, Burial Treatment Plan, biological assessment and Endangered Species Recovery Plan must be developed for proper management of the property and the Department should commit to a timeline to initiate these studies. Any use of the property is irresponsible without these studies.

The plan mentions the need for relocation of 'iwi kupuna. Please note that relocation of 'iwi kupuna is typically regarded as the last option. Preservation in place is always preferred. We need to honor the wishes of the kupuna and the descendants when discussing uses on the property and potential impacts to burial sites.

Finally, I would also like to recommend that the Department form a "Ka Lae Hoa'aloa" Community Advisory Committee to help with the implementation of the plan. The committee membership can be volunteer with possible nominations approved by the Commission and its purpose would be to serve as a voice for the community. The committee also needs to be the driving force behind the plan so that it is carried out expeditiously. Membership should not be limited to beneficiaries and the public should be allowed to attend the meetings. I think that the committee could be more effective if it included beneficiaries, homestead residents, cultural practitioners, environmental stewards, and community fishermen.

In closing, we ask the Department to remember the community vision. We have made great steps by completing this draft plan but we must stay focused on the need for protection of the 'aina through enforcement and preservation of its resources. Before we consider economic ventures and other opportunities, let us malama what we have now and as Ka Lae heals, we restore our own health and dignity.

I appreciate your consideration of these comments and look forward to review of the final draft plan.

Mahalo.

[REDACTED]