

William P. Kenoi
Mayor



FILE COPY

MAR 23 2016

Clayton S. Honma
Director

James M. Komata
Deputy Director

County of Hawai'i

DEPARTMENT OF PARKS AND RECREATION

101 Pauahi Street, Suite 6 • Hilo, Hawai'i 96720
(808) 961-8311 • Fax (808) 961-8411

March 4, 2016

Scott Glenn, Interim Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu HI 96813

Dear Mr. Glenn:

Subject: Final Environmental Assessment and FONSI for Kukuihaele Park Improvements, TMK (3rd.) 4-8-006:010, Hāmākua District, Island of Hawai'i

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

16 MAR -8 AM 09

RECEIVED

With this letter, the County of Hawai'i, Department of Parks and Recreation hereby transmits the final environmental assessment and finding of no significant impact (FEA-FONSI) for the Kukuihaele Park Improvements project for publication in the next available edition of the Environmental Notice. We have enclosed the following:

- One paper copy of the Final EA;
- A CD containing the .pdf file for the EA and a WORD file with the OEQC Environmental Notice Publication Form; and
- A hardcopy of the OEQC publication form

Please contact James Komata at 961-8311 if you have any questions.

Sincerely,

Clayton Honma, Director
County of Hawai'i, Department of Parks and Recreation

Attach: As noted above

Cc: (w/o attach) Ron Terry, Ph.D, Project Environmental Consultant

**AGENCY
PUBLICATION FORM**

MAR 23 2016

Project Name:	Kukuihaele Park Improvements
Project Short Name:	Kukuihaele Park Improvements
HRS §343-5 Trigger(s):	Use of County land and County funds
Island(s):	Hawai'i
Judicial District(s):	Hāmākua
TMK(s):	(3rd) 4-8-006:010
Permit(s)/Approval(s):	National Pollutant Discharge Elimination System Permit (State DOH) Individual Wastewater System Permit (IWS) (State DOH) Grading, Grubbing and Work Within County Right-of-Way Permits (County DPW) Building Permits and Plan Approval (County DPW and Planning) Chapter 6e, HRS, determination from State Historic Preservation Division on historic property effects Disability and Communication Access Board (DCAB) plan review and approval
Proposing/Determining Agency:	County of Hawai'i Department of Parks and Recreation
Contact Name, Email, Telephone, Address	James Komata, James.Komata@HawaiiCounty.gov , 961-8311 101 Pauahi Street, Suite 6 Hilo, Hawai'i 96720
Accepting Authority:	(for EIS submittals only)
Contact Name, Email, Telephone, Address	
Consultant:	Geometrician Associates
Contact Name, Email, Telephone, Address	Ron Terry, rterry@hawaii.rr.com , 969-7090 PO Box 396 Hilo HI 96721

Status (select one) DEA-AFNSI**Submittal Requirements**

Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEA, and 4) a searchable PDF of the DEA; a 30-day comment period follows from the date of publication in the Notice.

 FEA-FONSI

Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; no comment period follows from publication in the Notice.

 FEA-EISPN

Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; a 30-day comment period follows from the date of publication in the Notice.

 Act 172-12 EISPN
("Direct to EIS")

Submit 1) the proposing agency notice of determination letter on agency letterhead and 2) this completed OEQC publication form as a Word file; no EA is required and a 30-day comment period follows from the date of publication in the Notice.

 DEIS

Submit 1) a transmittal letter to the OEQC and to the accepting authority, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEIS, 4) a searchable PDF of the DEIS, and 5) a searchable PDF of the distribution list; a 45-day comment period follows from the date of publication in the Notice.

 FEIS

Submit 1) a transmittal letter to the OEQC and to the accepting authority, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEIS, 4) a searchable PDF of the FEIS, and 5) a searchable PDF of the distribution list; no comment period follows from publication in the Notice.

 FEIS Acceptance
Determination

The accepting authority simultaneously transmits to both the OEQC and the proposing agency a letter of its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS; no comment period ensues upon publication in the Notice.

- FEIS Statutory Acceptance Timely statutory acceptance of the FEIS under Section 343-5(c), HRS, is not applicable to agency actions.
- Supplemental EIS Determination The accepting authority simultaneously transmits its notice to both the proposing agency and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is or is not required; no EA is required and no comment period ensues upon publication in the Notice.
- Withdrawal Identify the specific document(s) to withdraw and explain in the project summary section.
- Other Contact the OEQC if your action is not one of the above items.

Project Summary

Provide a description of the proposed action and purpose and need in 200 words or less.

The County of Hawai'i Department of Parks and Recreation proposes to improve and expand the facilities at Kukuihaele Park. Although Kukuihaele Park is a valued asset in this small, rural community, it lacks needed recreational facilities. P&R has designed improvements to help meet these recreational needs while still maintaining much of the open space that is currently present and not overtaxing local roads. The project involves a new 27-space parking lot, including four ADA accessible stalls; a new comfort station; a new pavilion; an improved basketball court; a new softball/Little League baseball field with backstops, dugouts, bleachers, and fencing; a jogging path that winds around the baseball field; and removal of various trees to accommodate site features and new landscaping with milo and palm trees, among others. No impacts to any biological or water resources would occur. No archaeological sites are present and no cultural uses would be affected. Mitigation includes timing of clearing to avoid impacts to listed vertebrate species, NPDES and grading permits with best management practices during construction to avoid erosion and sedimentation, consultation of DOH concerning the need for a community noise control permit during construction, a dust control plan and precautionary conditions related to inadvertent finds of cultural materials. Minor traffic increases related to use by residents and drive-by visits by tourists seeking a restroom are expected to occur.

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OFFICE OF ENVIRONMENTAL QUALITY CONTROL

Kukuihaele Park Improvements
Final Environmental Assessment

TMK (3rd) 4-8-006:010
Hāmākua District, Hawai‘i Island, State of Hawai‘i

March 2016

Prepared for:
Hawai‘i County
Department of Parks and Recreation
101 Pauahi Street, Suite 6
Hilo, Hawai‘i 96720

Kukuihaele Park Improvements Final Environmental Assessment

TMK (3rd) 4-8-006:010
Hāmākua District, Hawai‘i Island, State of Hawai‘i

**PROPOSING/
APPROVING AGENCY:**

County of Hawai‘i
Department of Parks and Recreation
101 Pauahi Street, Suite 6
Hilo, Hawai‘i 96720

CONSULTANT:

Geometrician Associates LLC
P.O. Box 396
Hilo Hawai‘i 96721

CLASS OF ACTION:

Use of State/County Land and County Funds

This document is prepared pursuant to:
The Hawai‘i Environmental Protection Act,
Chapter 343, Hawai‘i Revised Statutes (HRS), and
Title 11, Chapter 200, Hawai‘i Department of Health Administrative Rules (HAR).

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SUMMARY OF THE PROPOSED ACTION, ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The County of Hawai‘i Department of Parks and Recreation (P&R) proposes to improve and expand the facilities at Kukuihaele Park. Although Kukuihaele Park is a valued asset in this rural and somewhat isolated community of about 350 inhabitants, it lacks needed recreational facilities. P&R has designed improvements to help meet these recreational needs while still maintaining much of the open space that is currently present and not overtaxing local roads. The project involves a new 27-space parking lot, including four ADA accessible stalls; a new comfort station; a new pavilion; an improved basketball court; a new softball/Little League baseball field with backstops, dugouts, bleachers, and fencing; a jogging path that winds around the baseball field; and removal of various trees to accommodate site features and new landscaping with *milo* and palm trees, among others. The project will be prepared with a base bid and one or more alternate bid items based on priority level, and the project may be phased.

No impacts to any biological or water resources would occur. No archaeological sites are present and no cultural uses would be affected. Mitigation includes timing of clearing to avoid impacts to listed vertebrate species, NPDES and grading permits with best management practices during construction to avoid erosion and sedimentation, consultation of DOH concerning the need for a community noise control permit during construction, a dust control plan and precautionary conditions related to inadvertent finds of cultural materials. Minor traffic increases related to use by residents and drive-by visits by tourists seeking a restroom are expected to occur.

PART 1: PROJECT DESCRIPTION, PURPOSE AND NEED AND ENVIRONMENTAL ASSESSMENT PROCESS

1.1 Project Location, Purpose and Need and Description

The County of Hawai'i Department of Parks and Recreation (P&R) proposes to improve and expand the facilities at Kukuihaele Park, which is located in the village of Kukuihaele about a mile from the Waipi'o Lookout (Figures 1-4). The park is State of Hawai'i land that was encumbered under Executive Order 3990 to P&R. The improvements are being funded through Ordinance No. 15-58, which was passed unanimously by the Hawai'i County Council on June 2, 2015.

Although Kukuihaele Park is a valued asset in this rural and somewhat isolated community of about 350 inhabitants, there is currently a lack of needed recreational facilities. Residents have repeatedly expressed to their elected representatives and P&R the desire to have better facilities along with the socioeconomic benefits that accrue from recreational activities. Among these efforts, longtime resident Paul Christensen, who started the senior softball league in Hāmākua, led a drive in 1978 that resulted in hundreds of petition signatures to build tennis courts below the old teachers' cottages. Playground equipment was installed by a group of citizens led by Alberta Mock Chew in 1990. Despite a history of citizen interest, the park lacks some critical facilities. In particular, there is no regulation Little League or senior softball field within almost 10 miles. Similarly, the area lacks a pavilion for community events or family parties such as first birthday luaus. The park has no comfort station and the basketball court is substandard.

P&R has designed the improvements to help meet these recreational needs while still maintaining much of the open space that is currently present and not overtaxing local roads. As shown in the Site Plans in Figure 4, the project involves the following:

- A new parking lot for approximately 27 vehicles, including four ADA accessible stalls
- A new 1,152- square foot pavilion and an adjacent comfort station with an approved IWS
- An improved basketball court
- A new softball/Little League baseball field, which will include backstops, dugouts, bleachers, and fencing
- A jogging path that winds around the baseball field
- Removal of various trees to accommodate site features and landscaping with *koa* *milo* and palm trees and hardscape features including benches and walkways (see second sheet Site Plan, Fig. 4)

1.2 Environmental Assessment Process

This Environmental Assessment (EA) is being conducted in accordance with Chapter 343 of the Hawai'i Revised Statutes. This law, along with its implementing regulations, Title 11, Chapter 200, of the Hawai'i Administrative Rules, is the basis for the environmental impact process in the State of Hawai'i. According to Chapter 343, an EA is prepared to determine impacts associated with an action, to develop mitigation measures for adverse impacts, and to determine whether any of the impacts are significant according to thirteen specific criteria. Part 4 of this document states the anticipated finding that no significant impacts are expected to occur; Part 5 lists each criterion and presents the preliminary findings for each made by the Hawai'i County Department of Parks and Recreation, the proposing and approving agency. If, after

Figure 1. Location Map

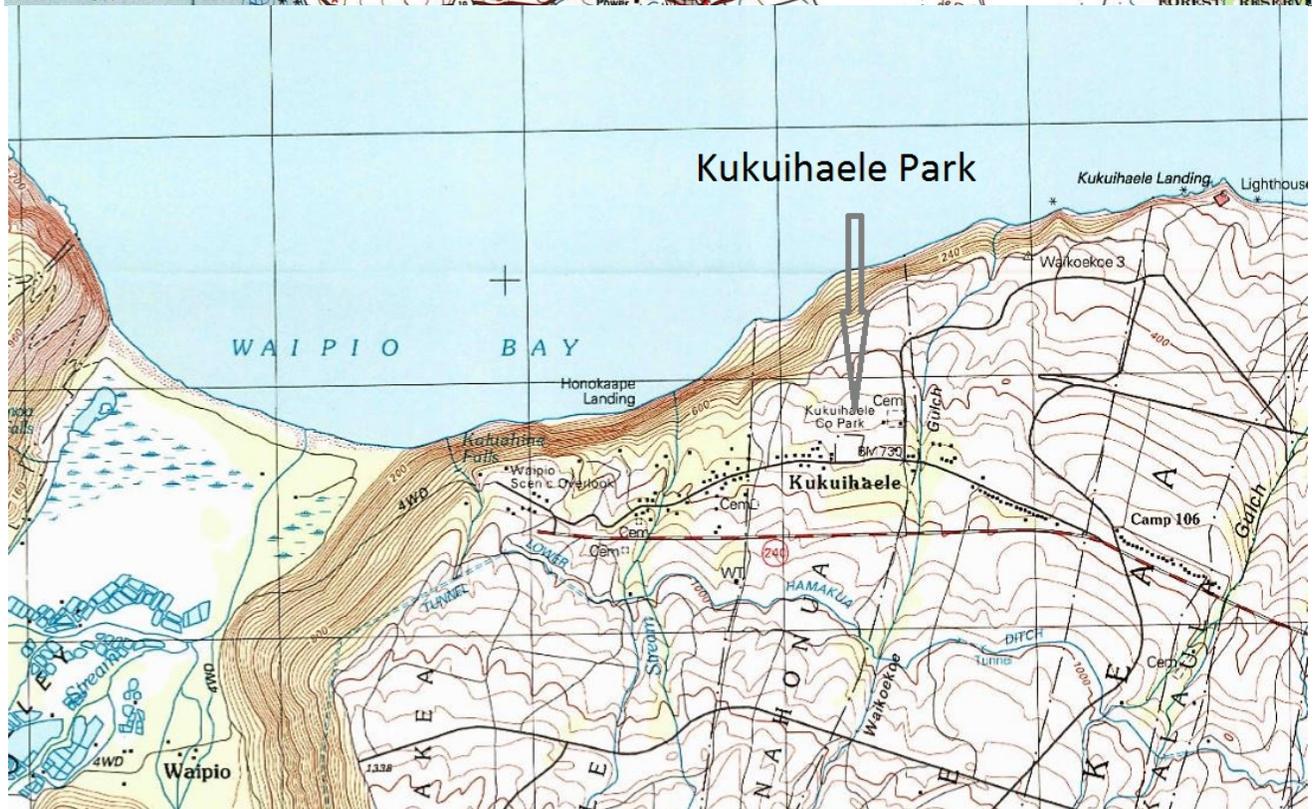
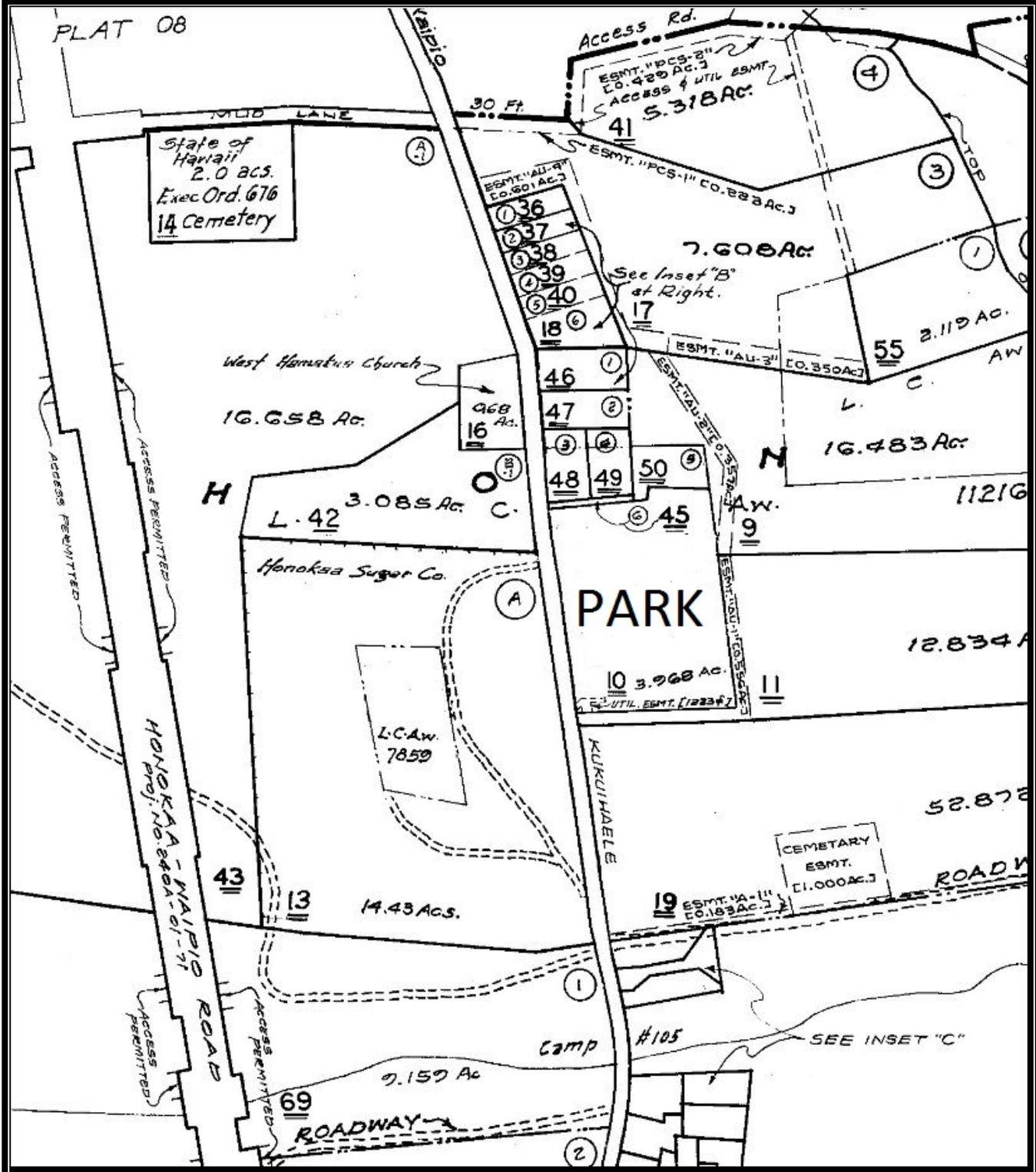


Figure 2. TMK Map



Portion TMK Plat 8-4-002. Source: County of Hawai'i Real Property Tax Maps.

Figure 3. Project Site Photos



3a: Park entrance ▲ ▼ 3b. Southeastern portion of park, with baseball field on left



Figure 3. Project Site Photos



3c. Former site of teachers' cottages ▲ ▼ 3d. View to southeast within park



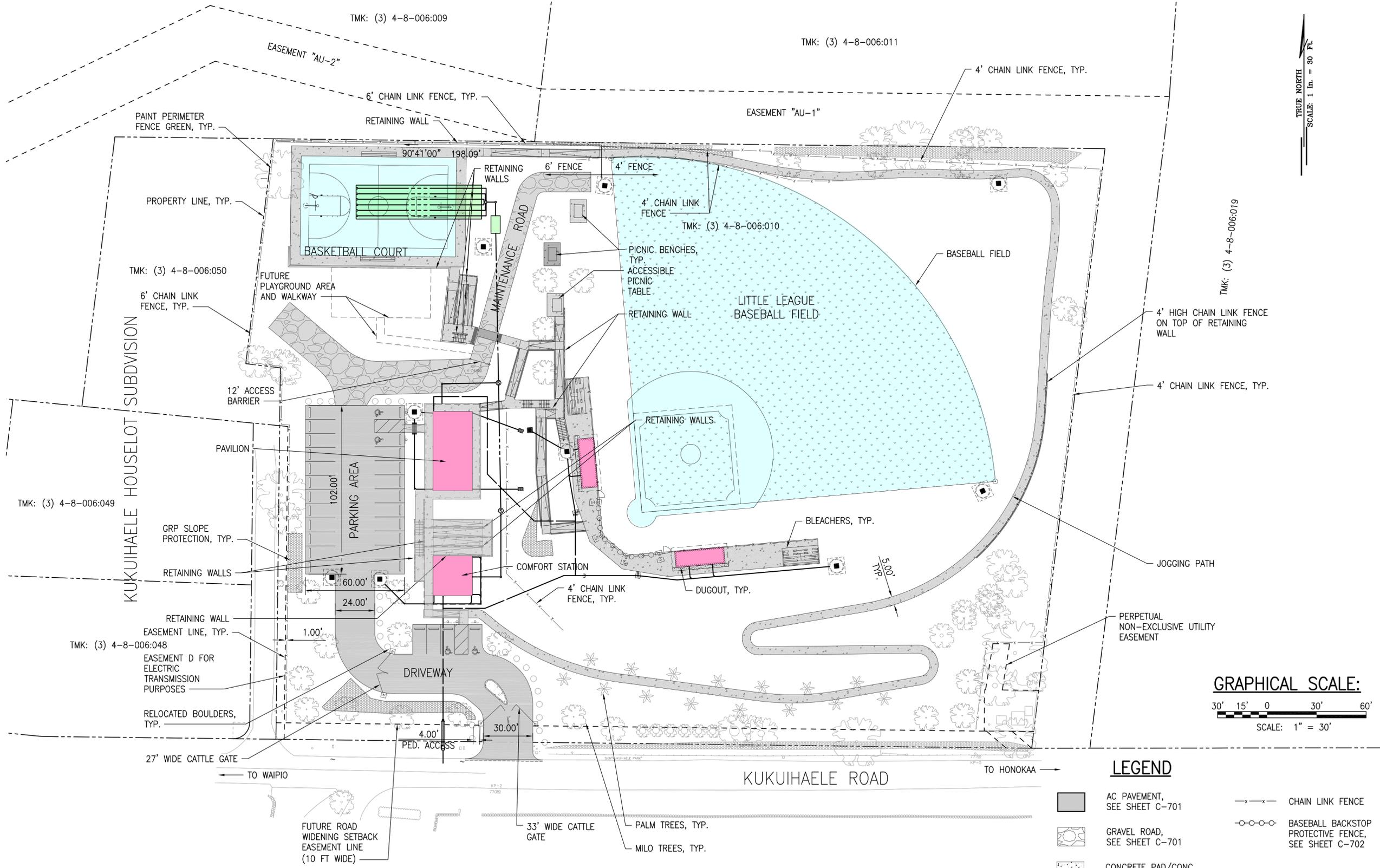
Figure 3. Project Site Photos



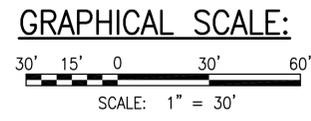
3e. Driveway along northern boundary of park, view to west. ▲ ▼ 3f. Basketball court



W:_CIVIL_3D_PROJECTS\2015_096.000 DPR KUKUIHALE PARK IMPROV\02 EXHIBITS\160304 SITE PLAN PUB MTG\160303 OVERALL SITE PLAN_AL16.DWG 3/3/2016 11:22 AM KSAW



TRUE NORTH
SCALE: 1 in. = 30 ft.



- NEW STRUCTURES
- NEW BASKETBALL COURT, NEW BASEBALL FIELD
- NEW WALKWAYS, RAMPS, PARKING LOT, SLABS, AND ROADS
- IMPROVED WASTEWATER SYSTEM

- LEGEND**
- AC PAVEMENT, SEE SHEET C-701
 - GRAVEL ROAD, SEE SHEET C-701
 - CONCRETE PAD/CONC. WALKWAY, SEE SHEET C-701
 - GRP SLOPE PROTECTION, SEE SHEET C-700
 - CHAIN LINK FENCE
 - BASEBALL BACKSTOP PROTECTIVE FENCE, SEE SHEET C-702

OVERALL SITE PLAN
SCALE: 1" = 30'

SSFM
INTERNATIONAL
SSFM INTERNATIONAL, INC.
99 Aupuni Street, Suite 202
Hilo, Hawaii 96720

KUKUIHALE PARK IMPROVEMENTS	
OVERALL SITE PLAN	
SCALE: 1" = 30'	DATE: MAR. 2016

FIGURE
1

considering comments to the Draft EA, the approving agency concludes that no significant impacts would be expected to occur, then the agency will issue a Finding of No Significant Impact (FONSI), and the action will be permitted to proceed to other appropriate approval and permit processes. If the agency concludes that significant impacts are expected to occur as a result of the Proposed Action, then an Environmental Impact Statement (EIS) will be prepared.

1.3 Public Involvement and Agency Coordination

The following agencies and organizations were consulted by letter during development of the Environmental Assessment.

State:

Department of Health, Environmental Health Administration
Department of Land and Natural Resources, Chairperson and State Historic Preservation Division
Department of Transportation, Highways Division
Office of Hawaiian Affairs

County:

Civil Defense Agency
County Councilmember Valerie Poindexter
Department of Public Works
Department of Water Supply
Fire Department
Planning Department
Police Department

Private:

Sierra Club
Six adjacent property owners

Responses received from early consultation are contained in Appendix 1a. Timely comments to the Draft EA and responses to these comments are contained in Appendix 1b. Various places in the EA have been modified to reflect input received in the comment letters; additional or modified non-procedural text is denoted by double underlines, as in this sentence.

P&R received 27 comments on the Draft EA, which gave insight into the varied opinions of a diverse and changing community and offered a variety of visions of what the ideal layout should be. It is noted that a number of commenters opposed restoring the ballfield, primarily because it would subtract from the available space for passive activities and gathering, but also because of traffic concerns and what they judge to be a lack of demand. A smaller number opposed fencing for visual and access reasons. A few commenters opposed paved parking, a relocated basketball court, use of the park for recreation rather than traditional farming and the removal of fruit and ornamental trees and the planting of *koa* and Alexander palm trees. Others were concerned with air quality, noise and light. Some residents said that the proposed plan did not reflect the needs of the current residents of Kukuihaele. It should also be noted that a number of commenters supported most or all of the proposed features.

After consideration of comments, P&R decided that the essential design proposed in the Draft EA truly did best meet the island's needs. There is considerable demand for ballfield space throughout the County by Little League and *kupuna* softball for both league games and pickup practices with varying numbers of players. P&R will attempt to accommodate the occasional larger gatherings through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park. Concerning the needs of current residents, although P&R does not necessarily concur that the proposed facilities do not meet such needs, it is also important to note that just as Kukuihaele residents are able to enjoy facilities at parks in Waimea, Honokaa, Hilo, Hapuna and other parts of the island, other island residents should be able to enjoy Kukuihaele's facilities. Having facilities that are open to and mindful of the needs of all County users allows residents to leverage the value of the parks.

However, P&R also determined that some new features were required and that a number of elements needed changes to address concerns. Accordingly, the Site Plan was modified in a number of ways, which is reflected in Figure 4. The following summarizes the changes:

The Site Plan now accommodates the future development of a children's playground at the park. Rather than give up important features of the park, P&R designed retaining walls and grading to extend the useable amount of park land to accommodate this use. The playground can be installed at a later date when funding and priority are aligned for this recreational amenity. In order to make room for the playground, there will be a system of reinforced concrete retaining walls along the west portion of the north edge of the park, creating an area that must be filled to level it off. In order to tie in these new elevations with accessible routes, a 2-tiered ramp was added to the perimeter walking path's connection to the basketball court, and a 3-tiered switchback ramp was added nearest the pavilion. The basketball court was shifted to the north edge of the park so that the playground could be closer to the pavilion and parking lot and afford better visibility to/from the pavilion and parking lot. Also, the basketball court will be lower in elevation than the playground to prevent errant balls from impacting the playground and the children using it. The grassed area between the future playground and the switchback ramp may be large enough to accommodate future picnic tables and possibly a small shade tree. *This site redesign has added approximately \$500,000 to \$600,000.*

The proposed 6-foot high park perimeter chain link fence at the north and east boundaries of the park was reduced to 4 feet, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. The fence will be painted dark green to help it blend in better with the existing background. While it is recognized that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this

consent cannot be assumed to be in place for all park users for every function that occurs there, for now and in perpetuity. The redesign achieves a cost savings of about \$6,000 to \$9,000.

The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The redesign achieves a cost savings of about \$19,000 to \$22,000.

The koa trees will be replaced by a different species, possibly milo, which will be determined later. There are negligible cost implications for this design change.

Alexander palms will be either replaced with a different species or eliminated. This may yield a cost of savings of about \$10,000.

In order to have greater flexibility to deal with construction costs and the park's budget, and also to address concerns received from the community, P&R structured the bid solicitation for construction of the park into multiple additional bid alternates, which addressed certain components in a modular way. Final determination on what the actual scope of construction improvements was reserved until bids were opened and actual costs and logistical considerations are determined. The project's bid opening date, originally December 23, 2015, was postponed four (4) times. These postponements were implemented for various reasons; the last postponement was to allow for the development of design modifications to address input gathered at the January 10, 2016, public meeting in Honokaa. Bids were finally opened on February 11, 2016, and the project came in above the County's estimate. The County is currently determining what scope of work will be incorporated into the construction effort taking in to account all considerations such as public input, P&R needs, availability of funding, etc.

1.4 Cost and Schedule

Shortly after the EA is complete and necessary permits are obtained, construction will begin. The improved facility is scheduled to be completed by late 2016. The cost of the improvements is currently estimated at \$2.5 million, a figure which will be refined as part of final design. The project may include phasing of certain improvements to ensure the project's viability should actual constructions exceed available funding. While the goal is to construct the improvements in their totality via one project, a disadvantageous bidding environment combined with limited funding may necessitate the project being delivered via a phased approach over several years. It is anticipated that the project will be prepared with a base bid and one or more alternate bid items representing distinct scopes of work based on priority of need.

PART 2: ALTERNATIVES

2.1 No Action Alternative

Under the No Action Alternative, the County of Hawai‘i would not provide any improvements at Kukuihaele Park. Recreational facilities in this community, which currently also help service the larger town of Honokaa and the villages in between, would continue to be substandard. No regulation Little League or senior softball games could take place and the basketball court would be substandard. No pavilion for community events would be provided. There would be no comfort station to replace the portable toilets. Although the park would still have value for passive recreation such as dog-walking, picnicking and events where residents provided their own portable shelters, it would not fulfill the needs of recreational users who have repeatedly requested improvements of the County. Under the No Action Alternative, this relatively unimproved park would continue to be inaccessible to persons with disabilities. The improvements associated with making a park accessible that also directly benefit families with small children in strollers, temporarily disabled persons, and others, would not occur. The socioeconomic benefits that ensue from needed recreational facilities would fail to accrue. Conversely, there would be no disturbance of the existing ground surface or vegetation, no impacts to traffic in the area, and no disturbance to neighbors. The No Action Alternative provides a basis for comparing the impacts of the proposed project.

2.2 Alternative Locations

If the proposed improvements planned for Kukuihaele Park were not built here, it is not infeasible that another site could be developed with similar facilities. P&R understands that residents are concerned about the improved park potentially diverting tourists drawn by the Waipi‘o Lookout who require restrooms into the community, bringing undesired traffic, a subject that is discussed in Sections 3.2.1 and 3.3.2, below. One way to avoid this possible adverse effect would be to develop a new park in an area outside the village, where land is available. However, there are many disadvantages to having such facilities elsewhere that have led P&R to not seek other sites. First, the County does not have other existing property in the area and would need to acquire the property to build another park. This process would require more funding and could take a number of years to complete. Second, it would be difficult to justify another community park facility in an area with the limited population of roughly 500 that would be served by the park. Kukuihaele Park has provided a recreational function for this community for at least eight decades and is cherished by its residents, particularly those born and raised here, some of whom attended school next door. It is P&R’s policy to emphasize more intensive use of valued existing recreational properties in order to save money in development costs and maintenance. Two parks would be inefficient to fund and maintain. The high costs of developing another new park would likely mean that Kukuihaele Park itself would lack facilities. That would mean that the park that currently exists in the center of the community would be neglected in favor of a park that would be accessible mainly to motorists. Rather than relocate the primary recreational facility outside the community, P&R believes that it is more cost-effective and rational to continue to seek funding for development of the Waipi‘o Lookout facilities and particularly an interpretive center at the former Rice Property near the lookout. Ultimately, the needs of both residents and visitors would be better served by this strategy.

PART 3: ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

The location for the Proposed Action is referred to throughout this EA as the *project site* (see Figures 1-3). The term *project area* refers generally to this part of the Hāmākua District.

3.1 Physical Environment

3.1.1 Climate, Geology, Soils and Geologic Hazards

Environmental Setting

The climate at the project site, which is 700 feet above sea level, is warm and humid. The average annual rainfall is about 80 inches and the mean annual temperature is approximately 74 degrees F. (Giambelluca et al 2013; UH Hilo-Geography 1998). Geologically, the project area is located on the lower flank of Mauna Kea volcano, on weathered basalts from Pleistocene-era lava flows of the Hāmākua Volcanic series (Wolfe and Morris 1996). The well-weathered soil on the project site is classified by the U.S. Natural Resources Conservation Service (formerly Soil Conservation Service) as Paauhau medial silty clay loam, 10 to 20 percent slopes. This soil is permeable and well-drained. In a representative profile, the surface layer is silty clay loam underlain by layers of hydrous clay loam and then bedrock at about four feet. This soil is currently used for grazing and vegetable crops and was formerly used extensively for irrigated sugarcane (U.S. Soil Conservation Service 1973). Specific laboratory testing of soil borings by a geotechnical firm revealed relatively high in-situ moisture contents and low dry densities. Underlying the soil was completely to moderately weathered bedrock, and no seepage or evidence of groundwater was encountered.

The entire Island of Hawai‘i is subject to geologic hazards, especially lava flows and earthquakes. The U.S. Geological Survey assesses volcanic hazard in this area of Hāmākua as Zone 8, on a scale of ascending risk from 9 to 1 (Heliker 1990:23). The low hazard risk is based on the fact that Mauna Kea is presently considered a dormant volcano. Only a few percent of Zone 8 areas have been covered by lava in the past 10,000 years, the zone is thus considered among the least hazardous areas on the island. As such, there is negligible risk of lava inundation over relatively short time scales in the project area.

The Island of Hawai‘i experiences high seismic activity and is at risk from major earthquake damage (USGS 2000), especially to structures that are poorly designed or built, as the 6.7-magnitude quake of October 15, 2006 demonstrated. The portion of the project site proposed for improvements is graded and flat to moderately sloping. There are appropriate setbacks to surrounding steeper slopes. No evidence of mass wasting is apparent, and P&R has no records of occurrences, including after the 2006 earthquake. There does not appear to be any risk to damage on the site from subsidence, landslides or other forms of mass wasting.

Impacts and Mitigation Measures

Geologic conditions impose no constraints on the Proposed Action, and the continued utilization and improvement of the area for recreational purposes is not imprudent to undertake. The results of fieldwork and laboratory testing indicated that from a geotechnical viewpoint, the site can generally be developed as planned. Conventional shallow foundations, such as spread footings or thickened slab foundations, may be used to support the proposed structures. Most of the surface of Hawai‘i Island is subject to eventual lava inundation, and all recreational facilities face some level of risk. Given the need for improved sports and gathering space facilities in the area, the County has determined that it is sensible to improve the park. All facilities will be designed based on requirements of the 2006 International Building Code as adopted and amended by Chapter 5 (Building) of the Hawai‘i County Code to ensure appropriate design. No mitigation measures related to geologic conditions are expected to be required.

3.1.2 Drainage, Water Features and Water Quality

Existing Environment

The Hāmākua District is heavily dissected by a radial network of sub-parallel permanent and intermittent streams, typical of weathered volcanoes in humid climates. The project site is about 0.3 miles from the shoreline and over 500 feet from any permanent or intermittent streams. No ponds, lakes, wetlands or other water bodies are on or near the site. According to official flood maps (FEMA FIRM Panel 1551660200 C, dated September 16, 1988), the project site is within Flood Zone X, outside of the 100-year or 500-year floodplain.

Impacts and Mitigation Measures

Landclearing and construction activities, including parking, would occur in an area greater than one acre, and thus will require a National Pollutant Discharge Elimination System (NPDES) permit to ensure that erosion and sedimentation impacts to adjacent waters will be minimized. Plans submitted as part of the application for this permit and a County grading permit will specify practices to minimize the potential for sedimentation, erosion and pollution of coastal waters. The County will ensure that its contractor shall perform all earthwork and grading in conformance with:

- (a) “Storm Drainage Standards,” County of Hawai‘i, October, 1970, and as revised.
- (b) Applicable standards and regulations of Chapter 27, “Flood Control,” and Chapter 10, “Erosion and Sedimentation Control,” of the Hawai‘i County Code.
- (c) Conditions of an NPDES permit.

Best Management Practices will include, but may not be limited to, the following practices:

- The contractor will install compost filter socks at certain areas of the construction site to restrict sediment movement.
- The contractor will construct and utilize a stabilized construction entrance to minimize tracking material offsite onto the adjacent road.

- Construction activities with the potential to produce polluted runoff will not be allowed during unusually heavy rains or storm conditions that might generate storm water runoff.

3.1.3 Flora, Fauna and Ecosystems

Existing Environment

The natural vegetation of this part of Hāmākua was most likely sub-montane rain forest dominated by ‘ōhi‘a (*Metrosideros polymorpha*) and koa (*Acacia koa*) (Gagne and Cuddihy 1990). These original communities were long ago eradicated or heavily degraded by sugar cane cultivation, cattle grazing, and clearing for small farms and residences. The vegetation of communities like Kukuihaele is now either managed (i.e., farms, pasture or landscaped grounds) or adventive “communities” of various alien weeds. Small remnants of native forest remain only in the far *mauka* areas of Hāmākua.

All locations on the project site have been utilized as a school and/or County park for up to a century, and the terrain and vegetation of the park have both been heavily modified. Most of the vegetation is managed park landscaping, primarily lawn grasses and ornamental trees and shrubs. Several areas that are not utilized for recreational purposes contain weedy herbaceous or woody vegetation; it appears that community planting efforts have landscaped some of the park with ornamental and fruit-bearing species, some of them Polynesian. Trees and shrubs are almost all non-native and include avocado (*Persea Americana*), Chinese banyan (*Ficus microcarpa*), octopus tree (*Schefflera actinophylla*) and various palms in the genera *Livistona*, *Roystonea* and *Archontophoenix* (Chinese fan, royal and king palms). Only three native plants were observed, all of them species that are considered common (the native koa tree was planted on the site). No rare threatened or endangered plant species were observed. A full list of plants observed on the site is included as Table 1.

The project site is not valuable habitat for native fauna. The six species of birds observed on the site during two visits totaling approximately 3 hours are listed in Table 2. All were non-native, and the most abundant during observation were Common Myna (*Acridotheres tristis*) and Japanese White-eye (*Zosterops japonicus*). A larger number of non-native bird species would probably be observed during additional observations. Only two native birds are highly likely to utilize the park. The Pacific Golden-Plover or *kolea* (*Pluvialis fulva*) is a migratory bird that resides in Hawai‘i from September to April and commonly forages or rests in grassy areas, particularly favoring the mown grasses of parks. Also known to be present in the area is the endangered Hawaiian Hawk (*Buteo solitarius*), which is found throughout wild, agricultural and urban landscapes on the Big Island wherever trees are present. Although they would unlikely to ever be observed at the site, it is also possible that the endangered Hawaiian Petrel (*Pterodroma sandwichensis*), and the threatened Newell’s Shearwater (*Puffinus auricularis newelli*) may occasionally overfly the site at altitudes of about 100 feet as they pass between nesting areas on high mountains to foraging grounds in the ocean. No suitable nesting habitat for these seabird species is present at or near the project site.

Table 1 Plants Observed at Kukuihaele Park August 2015

Scientific Name	Family	Common Name	Life Form	Status*
<i>Acacia confusa</i>	Fabaceae	Formosan Koa	Tree	A
<i>Acacia koa</i>	Fabaceae	Koa	Tree	E
<i>Acalypha hispida</i>	Euphorbiaceae	Chenille Plant	Shrub	A
<i>Ageratum conyzoides</i>	Asteraceae	Ageratum	Herb	A
<i>Ageratum houstonianum</i>	Asteraceae	Ageratum	Herb	A
<i>Albizia chinensis</i>	Fabaceae	Silk tree	Tree	A
<i>Aleurites moluccana</i>	Euphorbiaceae	Kukui	Tree	A
<i>Alocasia macrorrhizos</i>	Araceae	'Ape	Shrub	A
<i>Aloe vera</i>	Agavaceae	Aloe	Shrub	A
<i>Alpinia zerumbet</i>	Zingiberaceae	Shell Ginger	Herb	A
<i>Ananas comosus</i>	Bromeliaceae	Pineapple	Shrub	A
<i>Archontophoenix alexandrae</i>	Arecaceae	King Palm	Tree	A
<i>Artocarpus altilis</i>	Moraceae	Breadfruit	Tree	A
<i>Artocarpus heterophyllus</i>	Moraceae	Jackfruit	Tree	A
<i>Begonia sp.</i>	Begoniaceae	Begonia	Herb	A
<i>Bidens alba</i>	Asteraceae	Bidens	Herb	A
<i>Bidens pilosa</i>	Asteraceae	Spanish Needle	Herb	A
<i>Bougainvillea sp.</i>	Nyctaginaceae	Bougainvillea	Shrub/ Vine	A
<i>Breynia disticha</i>	Phyllanthaceae	Snowbush	Shrub	A
<i>Buddleia asiatica</i>	Buddleiaceae	Dog Tail	Shrub	A
<i>Cajanus cajan</i>	Fabaceae	Pigeon Pea	Shrub	A
<i>Canavalia cathartica</i>	Fabaceae	Maunaloa	Vine	A
<i>Carica papaya</i>	Caricaceae	Papaya	Tree	A
<i>Chamaecrista nictitans</i>	Fabaceae	Partridge Pea	Herb	A
<i>Chamaesyce hirta</i>	Euphorbiaceae	Hairy Spurge	Herb	A
<i>Colocasia esculenta</i>	Araceae	Taro	Shrub	A
<i>Commelina diffusa</i>	Commelinaceae	Honohono	Herb	A
<i>Conyza bonariensis</i>	Asteraceae	Conyza	Herb	A
<i>Cordyline fruticosa</i>	Agavaceae	Ti	Shrub	A
<i>Crinum sp.</i>	Amaryllidaceae	Spider Lily	Herbs	A
<i>Crotalaria incana</i>	Fabaceae	Rattlepod	Herb	A
<i>Cyperus polystachyos.</i>	Cyperaceae	Pycrus	Herb	I
<i>Delonix regia</i>	Fabaceae	Royal Poinciana	Tree	A
<i>Desmodium triflorum</i>	Fabaceae	Desmodium	Herb	A
<i>Dichorisandra thyrsiflora</i>	Commelinaceae	Blue Ginger	Herb	A
<i>Dracaena marginata</i>	Agavaceae	Dracena	Shrub	A
<i>Drymaria cordata</i>	Caryophyllaceae	Drymaria	Herb	A
<i>Eleusine indica</i>	Poaceae	Wiregrass	Herb	A
<i>Emilia sonchifolia</i>	Asteraceae	Flora's Paintbrush	Herb	A
<i>Epipremnum pinnatum</i>	Araceae	Pothos	Vine	A
<i>Eragrostis tenella</i>	Poaceae	Love Grass	Herb	A
<i>Erechtites hieracifolia</i>	Asteraceae	Fireweed	Herb	A
<i>Eucalyptus saligna</i>	Myrtaceae	Eucalyptus	Tree	A
<i>Euphorbia heterophylla</i>	Euphorbiaceae	Kaliko	Shrub	A
<i>Falcataria moluccana</i>	Fabaceae	Albizia	Tree	A
<i>Ficus microcarpa</i>	Moraceae	Chinese Banyan	Tree	A
<i>Ficus sp.</i>	Moraceae	Ficus	Tree	A

Scientific Name	Family	Common Name	Life Form	Status*
<i>Grevillea robusta</i>	Proteaceae	Silver Oak	Tree	A
<i>Indigofera suffruticosa</i>	Fabaceae	Indigo	Herb	A
<i>Justicia betonica</i>	Acanthaceae	White Shrimp Plant	Shrub	A
<i>Kyllinga brevifolia</i>	Cyperaceae	Kyllinga	Herb	A
<i>Livistona chinensis</i>	Arecaceae	Chinese Fan Palm	Tree	A
<i>Megathyrus maximus</i>	Poaceae	Guinea Grass	Herb	A
<i>Mimosa pudica</i>	Fabaceae	Sleeping Grass	Herb	A
<i>Musa (x) paradisiaca</i>	Musaceae	Banana	Shrub	A
<i>Nephrolepis multiflora</i>	Nephrolepidaceae	Sword Fern	Fern	A
<i>Paederia foetida</i>	Rubiaceae	Maile Pilau	Vine	A
<i>Paspalum conjugatum</i>	Poaceae	Hilo Grass	Herb	A
<i>Persea americana</i>	Lauraceae	Avocado	Tree	A
<i>Phymatosorus grossus</i>	Polypodiaceae	Maile Scented Fern	Fern	A
<i>Plantago lanceolata</i>	Plantaginaceae	Plantago	Herb	A
<i>Polygala paniculata</i>	Polygalaceae	Polygala	Herb	A
<i>Psidium guajava</i>	Myrtaceae	Guava	Tree	A
<i>Pteris vittata</i>	Pteridaceae	Ladder Brake	Fern	A
<i>Roystonea regia</i>	Arecaceae	Royal Palm	Tree	A
<i>Rubus rosifolius</i>	Rosaceae	Thimbleberry	Herb	A
<i>Sacciolepis indica</i>	Poaceae	Glenwood Grass	Herb	A
<i>Samanea saman</i>	Fabaceae	Monkeypod	Tree	A
<i>Schefflera actinophylla</i>	Araliaceae	Octopus Tree	Tree	A
<i>Schinus terebinthifolius</i>	Anacardiaceae	Christmas Berry	Tree	A
<i>Senecio madagascariensis</i>	Asteraceae	Fireweed	Vine	A
<i>Sida rhombifolia</i>	Malvaceae	Broom Weed	Herb	A
<i>Solanum americanum</i>	Solanaceae	Popolo	Herb	I
<i>Sonchus oleraceus</i>	Asteraceae	Sow Thistle	Herb	A
<i>Spathodea campanulata</i>	Bignoniaceae	African Tulip	Tree	A
<i>Sphagneticola trilobata</i>	Asteraceae	Wedelia	Herb	A
<i>Stachytarpheta sp.</i>	Verbenaceae	Stachytarpheta	Shrub	A
<i>Stictocardia beraviensis</i>	Convolvulaceae	Crimson Morning Glory	Vine	A
<i>Synedrella nodiflora</i>	Asteraceae	Synedrella	Herb	A
<i>Syngonium podophyllum</i>	Araceae	Arrowhead Plant	Vine	A
<i>Syzygium cumini</i>	Myrtaceae	Java Plum	Tree	A
<i>Vigna luteola</i>	Fabaceae	Hairy-pod Cowpea	Vine	A

*A = alien, E = endemic, I = indigenous, End = Federal and State listed Endangered Species (none present)

Also observed: various ornamental, non-native unkeyed bromeliads

Table 2. Bird Species Observed on Project Site

Scientific name	Common name	Status
<i>Acroditheres tristis</i>	Common Myna	A
<i>Cardinalis cardinalis</i>	Northern Cardinal	A
<i>Gallus gallus</i>	Chicken	A
<i>Geopelia striata</i>	Zebra Dove	A
<i>Meleagris gallopavo</i>	Wild Turkey	A
<i>Zosterops japonicus</i>	Japanese White-eye	A

A= Alien

The endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) likely forages in the area and could conceivably roost on some of the tall vegetation on the site. Apart from the Hawaiian hoary bat, all mammals in the project area are introduced species, including domestic or feral cats (*Felis catus*), small Indian mongooses (*Herpestes a. auropunctatus*) and various species of rats (*Rattus* spp.). None are of conservation concern and all are deleterious to native flora and fauna.

Impacts and Mitigation Measures

Because of the lack of rare, threatened or endangered native plants or intact native ecosystems on the project site, the Proposed Action would have no adverse impacts to native plants or vegetation habitat. Mitigation measures will be instituted in order to avoid impacts to Hawaiian Hawks, Hawaiian hoary bats, and listed seabirds:

- There will be no clearing of woody vegetation taller than 15 feet during the bat pupping season, which runs from June 1 through September 15 each year.
- If earthmoving or tree cutting is scheduled during the breeding season for Hawaiian Hawks (March through the end of September), the County will arrange for a hawk nest search to be conducted by a qualified biologist, and if hawk nests are present within 100 yards of any portion of the project site, all land clearing activity will cease until the expiration of the breeding season.
- All outdoor lighting will be required to be shielded in conformance with the Hawai‘i County Outdoor Lighting Ordinance to reduce the risk that seabirds may be attracted to and then disoriented by the lighting.
- No nighttime construction work will be allowed during the seabird-fledging season, which runs from September 15 through December 15 each year.

3.1.4 Air Quality, Noise, and Scenic Resources

Environmental Setting

Air pollution in Hāmākua is minimal, and is mainly derived from volcanic emissions of sulfur dioxide, which convert into particulate sulfate and produce a volcanic haze (vog) that occasionally blankets the project area. The persistent tradewinds keep the project area free of vog for most of the year.

Noise on the project site is low and derived mainly from motor vehicles, with occasional noise from park activities and residences, farms and road maintenance.

The project site is on a rural road in the scenic village of Kukuihaele. As illustrated in Figure 3, the site has pleasant views through to the ocean. The park itself also represents open space and a coastal view corridor for drivers on Kukuihaele Road or those residing *mauka* of the park. The Hawai‘i County General Plan does not specifically identify areas of natural beauty within Kukuihaele itself, although the view from the Waipi‘o Lookout is listed as an example of natural beauty that require consideration during development approvals. The park is not visible from the lookout.

Impacts and Mitigation Measures

During construction, there would be temporary and very minor effects to noise, air quality and visual quality. These activities could affect park users, drivers on Kukuihaele Road, and local residents. Construction will likely include compressors, vehicles and equipment engine operations, the specifics of which are dependent upon means and methods utilized by the contractor employed by the County. These activities can generate noise exceeding 95 decibels at times, impacting nearby sensitive noise receptors on the margins of the development. State law requires that whenever construction projects have noise that is expected to exceed the Department of Health's (DOH) "maximum permissible" property-line noise levels, contractors are required to consult with DOH per Title 11, Chapter 46, Hawai'i Administrative Rules (HAR) (Community Noise Control) prior to construction. DOH then reviews the proposed activity, location, equipment, project purpose and timetable in order to decide whether a permit is necessary and what conditions and mitigation measures, such as restriction of equipment type, maintenance requirements, restricted hours, and portable noise barriers, will be necessary.

DOH has set specific decibel levels into three classes based on land use. Title 11, Chapter 46, HAR contains the specific sound levels in A-weighted decibels (dBA), a measurement based on human hearing. The maximum permissible day and night levels vary by zoning district and time of day. Urban-zoned areas are classified as Class A lands, in which sound levels during construction may not exceed 55 dBA at the property boundary at any time of the day for more than 10 percent of the time within any twenty minute period, except by permit or variance. Impulsive noise – derived from activities such as hammering, pile driving, and explosion – shall be 10 dBA above the maximum permissible sound levels. Construction equipment with a motor and/or exhaust system shall operate with a muffler, except for pile hammers or pneumatic hand tools weighing less than 15 pounds. Earthmoving equipment can generate high levels of noise during construction, which will occur in the daytime. Mitigation measures include timing restrictions and ensuring that equipment has proper mufflers. In very sensitive situations, noise barriers and low-decibel engines can be employed to reduce the noise below standards. The County will require the contractor to restrict construction to daylight hours, and also require the contractor to consult with DOH to determine any other appropriate restrictions.

There is some potential for fugitive dust emissions during grading and construction. Short-term direct and indirect impacts on air quality could occur during construction, principally through fugitive dust from vehicle movement and soil excavation, and exhaust emissions from onsite construction equipment. The State of Hawai'i Air Pollution Control Regulations (Chapter 11-60, HAR) prohibit visible emissions of fugitive dust from construction activities beyond the property line, and that dust must be minimized through grading practices and dust control. The grading notes on the construction plans will direct the contractor to keep the area free of dust nuisances (most likely through watering) and to conduct all work in conformance with Chapter HAR 11-60.1, "Fugitive Dust," including having all vehicles maintain their emission control features in good working order. The current ballfield design specifies skinning of just the base paths rather than the entire infield, although the latter is a more preferable option for older youth baseball and softball users. However, minimizing dust is a concern and until the field is in existence for a period of time and dust is found to not be a problem, P&R will not consider skinning the entire infield. Dust from active use of the field may be mitigated by users via a light application of water prior to and during play. Hose bibs will be provided at the fields for that purpose as well as for maintenance use.

Operationally, the proposed improvements would not substantially affect air quality, noise levels or scenic sites recognized in the Hawai‘i County General Plan. Although baseball fields generate some dust during and between uses, it is generally not in significant enough amounts to require mitigation, such as field watering, although this can be undertaken if necessary. An inevitable consequence of increased use of a park is increased noise. As discussed in Section 3.3.2, there would also be an increase in vehicular traffic associated with use of the pavilion and comfort station. This could cause slight increases in noise and exhaust emissions, but such increases are expected to result in levels that are typical in rural County parks throughout the island, which are modest enough to not require mitigation.

As discussed in Section 3.1.3, above, a number of trees including avocado, Chinese banyan, octopus tree, Chinese fan palms, royal palms and king palms are present on the property. The improvements have been designed to retain some trees but remove others (see Site Plans in Figure 4 for details) to accommodate new facilities and also to reduce maintenance and hazards. The scenic character of the area would be modified due to removal of many of the existing trees, which would be compensated for by improved coastal view planes and landscaped vegetation more appropriate to the area, including *kōa* *milo* and palms that would be installed as part of the project. The lighting will be typical of that found in any small, neighborhood County park. The pavilion and comfort station will have ceiling mounted lights. Lights will turn on at dusk and turn off by 11pm. No lights are proposed for the baseball field or basketball court. Due to the isolated location within Kukuihaele village, the modest scale of the proposed facilities and new development that has occurred below the park within the coastal viewplane, no aspect of the action would detract from scenic views identified in the Hawai‘i County General Plan.

3.1.5 Hazardous Substances, Toxic Waste and Hazardous Conditions

Environmental Setting, Impacts and Mitigation Measures

The context of the project site, coupled with the absence of any known use of most of the site for other than limited school use prior to 1965 and recreational use since then suggests a low probability for hazardous materials. Additionally, visual surveys of the site and its surroundings during field investigations for the EA did not reveal any hazardous materials, or any uses, structures, equipment, or storage containers that might be indicative of hazardous material use. Therefore, based upon known prior and present use of the project site, no hazardous substances, toxic wastes, or hazardous conditions are expected to be present. If evidence of suspicious materials or conditions appears during additional survey, design, or construction, P&R will undertake a systematic assessment of the property.

3.2 Socioeconomic and Cultural

3.2.1 Socioeconomic Characteristics

As of the 2010 census, Kukuihaele had 226 inhabitants, with a diverse population in which the most represented ethnic group is “Two or more races” at 45.2%, followed by White (31.8%) and Asian (14.0%). Over 53% of the population is male, and almost 45% of the population is older than 45 years, higher than State and County averages and perhaps reflecting the plantation heritage. Kukuihaele Park is one of two public recreational facilities within area west of Honokaa through Kukuihaele, the other being

the Waipi‘o Lookout. The latter park is highly visited by tourists taking in the magnificent view of the Waipi‘o Valley and the cliffs to the northwest. It is also the staging area for trips into Waipi‘o Valley for both visitors and island residents, who go to enjoy the beach, fish and surf. Recreational area at Waipi‘o Lookout, which is a steep and small property, is very restricted.

As discussed in Section 1.1, the improvements are being funded by Ordinance No. 15-58, which was passed unanimously by the Hawai‘i County Council on June 2, 2015. The funding request was initiated by Councilmember Valerie Poindexter in response to calls from constituents. She held a public meeting in Kukuihaele to gauge community opinions about the project, reports of which provided initial information on community sentiment. In addition, various members of the public have kindly responded to the request for early consultation conducted as part of the EA, sharing diverse viewpoints.

Impacts

The improvements to Kukuihaele Park would benefit most area residents, who have repeatedly requested County officials for active recreational facilities. The project would render all of the buildings and amenities accessible to persons with disabilities, which has side benefits to families with small children in strollers, temporarily disabled (injured) persons, and others.

Several residents who provided informal input during the early consultation process expressed concern about the park improvements. As with any park project that draws more users, surrounding residents will experience some degree of increased noise and traffic. These adverse effects should be considered in the context of a park that from the 1930s through the 1980s had much higher levels of use. Many surrounding residents who have been part of the Kukuihaele community for over five decades took the view that improving the park would return it to its former central place in the social life of the community, when up to five baseball teams called the field home. Parks also have the potential to attract loiterers, drug users, and homeless or others who may illegally camp. The adverse effects will be mitigated by the proposed improvements to security and regulation. The park will be fenced and gated and access will be restricted to daytime and early evening hours. With clear rules, signage and gates, unauthorized use after hours can be more easily dealt with by the Police Department than the current situation.

The extent to which the improved park would be utilized by visitors is unknown but is expected to be modest. Currently, many visitors drive on Kukuihaele Road to shop at local stores and/or take an alternate way to or from the Waipi‘o Lookout, another County recreational facility. Many of these visitors require restrooms. Although a widely used comfort station is available at Waipi‘o Lookout, it is down a steep path on a small land area that makes it technically infeasible to make this comfort station accessible. If a comfort station were available at the improved Kukuihaele Park, it might induce a stop. This would be particularly likely if the availability of a restroom became well known through signage, guidebooks, smart-phone apps, etc. A few Kukuihaele residents expressed concern about drawing traffic and strangers into their community. The County of Hawai‘i maintains that providing accessible facilities at Kukuihaele Park, which is close proximity to Waipi‘o Lookout, serves the greater good by providing persons unable to use the restrooms at Waipi‘o equivalent accommodations nearby. As the site and space constraints at Kukuihaele Park are not conducive to buses and large vans conveying persons to use the comfort station facilities, it is unlikely that all but the occasional visitor would take advantage of them. Furthermore, P&R has implemented certain design elements to dissuade large passenger vehicles from using the park solely

as a rest stop for its riders. Nevertheless, the project would almost certainly place at least some small amount of additional traffic on Kukuihaele Road. As discussed in more detail in Section 3.3.2 below, the road is narrow, and residents might be inconvenienced by additional traffic. Conversely, merchants who rely on tourist drive-by traffic could benefit from increased business and sales, as would local employees. The availability of the Draft EA was made known to local residents and merchants in order to solicit their opinion on the net social effects of the proposed park improvements. As evidenced by letters in Appendix 1b, a number of commenters were highly concerned about the increase in park traffic changing the character of the village and making conditions unsafe. The safety of the road is discussed in Section 3.3.2, below. In response to comments about the change in character, P&R noted that it operates neighborhood parks similar to the scale of expansion proposed in Kukuihaele in communities throughout the island of Hawai‘i, and the agency was unaware of any major traffic issues.

One commenter expressed concern about the park being an unattractive land use that devalues property in the neighborhood. P&R noted that a community park is not a locally undesirable land use such as a landfill that lowers property values. On the contrary, studies analyzed by the American Planning Association have shown that proximity to parks is valued by homeowners, especially those with children, and that parks can make a community and a neighborhood more desirable, not to mention healthful (see, for example, <https://www.planning.org/cityparks/briefingpapers/economicdevelopment.html>).

3.2.2 Cultural Resources

This section utilizes land and park records and a variety of previous studies concerning Hāmākua and the Kukuihaele area, augmented by interviews with local residents.

Cultural and Historical Background

The project site is located in the modern district of Hāmākua in an area that was formerly heavily settled and utilized for dryland taro, less than a mile from Waipi‘o – one of the most celebrated wet taro valleys in Hawai‘i Nei. After the first Polynesians arrived in Hawai‘i, they shaped and utilized the natural environment over generations to provide all they needed for sustenance and survival. In the process they created a uniquely Hawaiian culture that was wholly adapted to the environment. The brief generalized cultural sequence that follows below provides a time frame for the peopling of Hawai‘i, the development of Hawaiian culture, the expansion and intensification of the Hawaiian population, and the resulting stresses on it from the earliest Polynesian settlers to the time of European Contact. The generalized cultural sequence that follows is based on Kirch’s (1985) model, but amended to include recent revisions offered by Kirch (2011). The initial settlement of Hawai‘i is believed to have occurred from the southern Marquesas Islands somewhere around 1000 AD. This was a period of great exploitation and environmental modification, when early Hawaiian farmers developed new subsistence strategies by adapting their familiar patterns and traditional tools to their new environment. Their ancient and ingrained philosophy of life tied them to their environment and kept order, which was further assured by the conical clan principle of genealogical seniority. The Hawaiians brought from their homeland certain universal Polynesian customs: the major gods Kāne, Kū, and Lono; the *kapu* system of law and order; cities of refuge; the *‘aumakua* concept; and the concept of *mana*. Initial permanent settlements in the islands were established at sheltered bays with access to fresh water and marine resources. Communities shared extended familial relations and there was an occupational focus on the collection of marine resources.

Over a period of several centuries the areas with the richest natural resources became populated and perhaps even crowded, and there was an increasing separation of the chiefly class from the common people. As the environment reached its maximum carrying capacity, the result was social stress, hostility, and war between neighboring groups. Soon, large areas of Hawai‘i were controlled by a few powerful chiefs.

The Development Period brought about a uniquely Hawaiian culture. The portable artifacts found in archaeological sites of this period reflect not only an evolution of the traditional tools, but some distinctly Hawaiian inventions. The adze (*ko‘i*) evolved from the typical Polynesian variations of plano-convex, trapezoidal, and reverse-triangular cross-section to a very standard Hawaiian rectangular quadrangular tanged adze. A few areas in Hawai‘i, including the summit region of Mauna Kea, produced quality basalt for adze production. The two-piece fishhook and the octopus-lure breadloaf sinker are Hawaiian inventions of this period, as are ‘*ulu maika* stones and *lei niho palaoa*. The later was a status item worn by those of high rank, indicating a trend toward greater status differentiation.

The Expansion Period is characterized by the great social stratification, major socioeconomic changes, and intensive land modification. Most of the ecologically favorable zones of the windward and coastal regions of all major islands were settled and the more marginal leeward areas were being developed. The greatest population growth occurred during the Expansion Period. Subsistence patterns intensified as crop farming evolved into large irrigated field systems and expanded into the marginal dry land areas. The *loko* or fishpond aquaculture flourished during this period.

For generations following initial settlement, communities were clustered along the watered, windward (*ko‘olau*) shores of the Hawaiian Islands, particularly in such valleys as Waipi‘o, about a mile west of Kukuihaele Park. Along the *ko‘olau* shores, streams flowed and rainfall was abundant, and agricultural production became established. The *ko‘olau* region also offered sheltered bays from which deep sea fisheries could be easily accessed. Nearshore fisheries, enriched by nutrients carried in the fresh water, could be maintained in fishponds and coastal waters. It was around these bays that clusters of family houses could be found. In these early times, Hawai‘i’s inhabitants were primarily engaged in subsistence level agriculture and fishing.

During the first couple centuries of habitation, areas with the richest natural resources became populated and perhaps crowded, and archaeological evidence suggests that by A.D. 1200 the population began expanding to the *kona* (leeward) side and more remote regions of the island. In the sixteenth century the population stabilized and the *ahupua‘a* land management system was established as a socioeconomic unit.

Over the generations, the ancient Hawaiians developed a sophisticated system of land and resources management. By the time ‘Umi-a-Līloa rose to rule the island of Hawai‘i around 1525, the island (*moku-puni*) was divided into six districts or *moku-o-loko*. The district of Hāmākua extends from the windward shores across the western slope of Mauna Kea and continues to the summit of Mauna Loa, where Hāmākua is joined by the districts of Ka‘ū, Hilo, and Kona. Hāmākua, like other large districts on Hawai‘i, was subdivided into ‘*okana* or *kalana* (regions of land smaller than the *moku-o-loko*, yet comprising a number of smaller units of land). The *moku-o-loko* and ‘*okana* or *kalana* were further

divided into manageable units of land, and were tended to by the *maka‘āinana* (people of the land). Of all the land divisions, perhaps the most significant management unit was the *ahupua‘a*. This subdivision of land was usually marked by an altar with an image or representation of a pig placed upon it. *Ahupua‘a* are typically wedge-shaped pieces of land that radiate out from the center of the island, extending to the ocean fisheries fronting the land unit, although many of the “wedges” extend from the sea inland only a limited distance before being cut off by other *ahupua‘a*.

The *ahupua‘a* were also divided into smaller individual parcels of land (such as the *‘ili*, *kō‘ele*, *māla*, and *kīhāpai*, etc.), generally oriented in a *mauka-makai* direction, and often marked by stone alignments (*kuaiwi*). In these smaller land parcels the native tenants tended fields and cultivated crops necessary to sustain their families and the chiefly communities with which they were associated. As long as sufficient tribute was offered and *kapu* (restrictions) were observed, the common people who lived in a given *ahupua‘a* had access to most of the resources from mountain slopes to the ocean. These access rights were almost uniformly tied to residency on a particular land, and earned as a result of taking responsibility for stewardship of the natural environment, and supplying the needs of the *ali‘i*. Entire *ahupua‘a*, or portions of the land were generally under the jurisdiction of appointed *konohiki* or lesser chief-landlords, who answered to an *ali‘i-‘ai-ahupua‘a* (chief who controlled the *ahupua‘a* resources). The *ali‘i-‘ai-ahupua‘a* in turn answered to an *ali‘i ‘ai moku* (chief who claimed the abundance of the entire district). Thus, *ahupua‘a* resources supported not only the *maka‘āinana* and *‘ohana* who lived on the land, but also contributed to the support of the royal community of regional and/or island kingdoms. This form of district subdividing was integral to Hawaiian life and was the product of strictly adhered to resource management planning. In this system, the land provided fruits and vegetables and some meat in the diet, and the ocean provided a wealth of protein resources.

Although in the modern era, the entire village is called Kukuihaele, it actually comprises three *ahupua‘a*: Kukuihaele, Kanahonua (the site of the park) and Waikoekoe. The latter two *ahupua‘a* are less well known, but one can presume that most of the land use patterns in Kukuihaele were also occurring next door. According to Pukui et al (1974), Kukuihaele translates as traveling light (torch), indicating the night marchers of legend who traveled through the area. No definition is given in this source for Kanahonua, but ethnohistorian Kepā Maly suggested that it might signify a “land that stretches out horizontally supporting cloud masses” (Maly 1994:1). Kukuihaele, like most *ahupua‘a* in Hāmākua, had a very narrow coastal zone at the rocky base of 500-foot tall cliffs. While not inhabited, it was utilized heavily for its marine resources. The fertile land behind the cliffs that Cordy (1994) termed the seaward upland slopes served as the main farming and housing zone. Dryland taro dominated agriculture, but banana and sweet potato were also important crops. Low stone walls and/or sugar cane “hedges” bordered the fields. Where streams were present, wetland taro cultivation was conducted. Even after its general adoption by many Hawai‘i communities, livestock raising was less common in Hāmākua than elsewhere. This seaward upland slopes also contained the principal round the island trail, which in many areas is now the location of the Hawai‘i Belt Road. Not every small *ahupua‘a* apparently contained a *heiau* (major religious structure). The historian Thomas Thrum reported in 1908 that one had been present in Kukuihaele but was now “gone” (Cordy 1994: 63).

Above the cultivated zone in most *ahupua‘a*, including Kukuihaele, were the forests. The forest zone in Hāmākua was traditionally a location for collecting *wauke* and *mamaki* bark for fish nets and cloth, for

bird catching to obtain feathers, and for harvesting *koa* canoe logs. Natural features such as caves as well as temporary open-air shelters were used as short-term habitations during resource extraction expeditions. Access to the upper forest areas would have been along repeatedly used trails, which have left traces on the landscape in many places.

The earliest historical knowledge of Hāmākua comes from legends written by Samuel Kamakau (1961) of a 16th-century chief ‘Umi-a-Liloa (son of Liloa), who at that time ruled the entire island of Hawai‘i. Descendants of Umi and his sister-wife were referred to as “Kona” chiefs, controlling Ka‘ū, Kona, and Kohala, while descendants of Umi and his Maui wife were “Hilo” chiefs, controlling Hāmākua, Hilo, and Puna (Kelly 1981:1). According to Kamakau (1961), they fought over control of the island, desiring access to resources such as feathers, *māmaki* tapa, and canoes on the windward side, and *wauke* tapa and warm lands and waters in leeward areas (Kelly 1981:3). As detailed in Cordy (1994), Waipi‘o was an important polity and sometimes a royal center throughout Hawaiian history.

Waipi‘o is associated with several of the most prominent of the Hawaiian *ali‘i*. It is also noted as a bountiful source of food, especially *kalo* (taro), which figures importantly as not only the staple of sustenance in Hawai‘i but also as a rich cultural symbol. At least 2,600 people occupied the valley. This home of royalty in the time of ‘Umi was also the location of one of the two principal *pu‘uhonua* (places of refuge) on the island of Hawai‘i. There are at least seven *heiau*, including Paka‘alana, the site of the *pu‘uhonua*. The housing cluster at Napo‘opo‘o, situated where Hi‘ilawe Valley joins Waipi‘o Valley, and Hi‘ilawe and Nanaue Falls, are other frequently mentioned places. Important and storied fishponds and royal bathing ponds are also present.

Dozens of traditional tales of supernatural and historical beings involve Waipi‘o. Notable are Lono, Kane, Kuka‘ilimoku, Kanaloa, Maui, Wakea, Milu, Puapualenalea, Nanaue (or Nenewe), Mo‘ikeha, ‘Olopana, Kiha, Liloa, and ‘Umi. According to a Bishop Museum report on the valley:

Lono chose as his wife, Kaikilani‘iopuna, who lived in a breadfruit grove near Hi‘ilawe Falls. The gods Kane and Kanaloa, along with lesser gods, are said to have resided at Alakahi in Waipi‘o. Maui is supposed to have gained possession of Ipumakania La‘amaomao, the ‘gourd of constant winds,’ from Kalei‘olu, a kahuna in Waipi‘o Valley. Maui eventually dies in Waipi‘o when he tries to steal bananas from some of the gods residing there. In old age, Wakea went to live in Waipi‘o Valley, where he eventually died and then established a kingdom in the land of the dead. He was succeeded as ali‘i of Waipi‘o by Milu. The ali‘i Milu becomes the ruler of the land of the dead when he disobeys Kane and is sent to the underworld. There are several versions of the story of the theft of the shell trumpet, Kiha–pu, in Waipi‘o Valley by the man–dog, Puapualenalena. The ali‘i are unable to obtain a solid night of sleep because the spirits or gods blow the Kiha–pu all night. Puapualenalena, who is an excellent thief, is asked by an ali‘i, variously reported to be Kiha or Laloa or Hakau, to steal the Kiha–pu, which he successfully accomplishes. As the offspring of a mortal (Kalei) and a shark–god (Kamohoali‘i), Nanaue lives near a waterfall on the west side of Waipi‘o Valley. Mysterious disappearance of men from the valley are eventually traced to Nanaue, who has a shark’s mouth on his back and has developed a taste for human flesh. He escapes to Hana (Lebo et al 1999).

Of historical importance is the fact that, Liloa, who unified the island of Hawai‘i, lived in Waipi‘o Valley. His son ‘Umi, a great farmer and fisherman who deposed his reportedly cruel brother, was an extremely important *ali‘i* associated with events and structures throughout the island. A *lo‘i* (taro patch) in Waipi‘o bears his name.

Ethnohistorical traditions indicate that Waipi‘o was associated with at least nine successive Pili line rulers of Hawai‘i Island, from Kaha‘imoele‘a to Umi (from roughly AD 1460 to 1620). Prior to the establishment of these Pili rulers, Waipi‘o was the residential base for powerful local rulers dating back to at least the AD 1200s. The royal residential area is described as being situated toward the mouth of the valley inland of the sand dunes. In this area were also located several *heiau*, a bathing pond, and two large fishponds. Three of these *heiau* are famed *luakini heiau*, and all appear to have remained in use until the abolition of the *kapu* system. Paka‘alana Heiau was one of the most important national *heiau*. The Paka‘alana compound, which also seemed to have served as a place of refuge or *pu‘uhonua*, contained the royal mausoleum known as Hale o Līloa, which was destroyed in 1830. The sennit-encased remains (*kā‘ai*) of Līloa and his grandson are said to have been removed prior to destruction of the mausoleum and taken to the Bishop Museum. Honua‘ula Heiau is said to have been constructed by ‘Umi and the place where he offered the sacrifice of his brother Hākau, who was killed by ‘Umi in the overthrow that led to ‘Umi’s succession as ruler. Moa‘ula Heiau was repaired and reconsecrated by Kalaniopu‘u sometime around 1780. It was dedicated to the war god Kūkā‘ilimoku, and in that ceremony Kalaniopu‘u proclaimed his son Kiwala‘o heir to the throne and placed his nephew Kamehameha in charge of the deity. This act is cited as setting the stage for the schism between cousins that eventually led to Kamehameha’s rise to power.

Pukui et al. (1976:114) refer to the cliff on the Hāmākua side of Waipi‘o Valley as Koa‘e-kea, and relate that “Kāne and various gods lived at the top of this cliff at a place called Hōkū-welowelo (comet); their conch sounded every night, to the annoyance of Chief Hākau, who ordered the thieving dog, Puapualenalena, to steal it.”

Early foreign visitors described the Kukuihaele area as fertile, well-watered and populated. When the Reverend William Ellis of the London Missionary Society passed through Kukuihaele in 1823 on his famous trip around the island, he described the area:

It was about 5 o’clock in the afternoon of the 16th, when Mr. Thurston and myself left Kapulena. Wishing to spend the Sabbath in the populous village of Waipio, we travelled fast along the narrow paths bordered with long grass, or through the well-cultivated plantations of the natives.... In many parts, where the country was level and open, the paths from one village to another were not than a foot wide, and very crooked (Ellis 1963: 254).

In 1832, the Reverend Lorenzo Lyons of the American Board of Commissioners of Foreign Missions (ABCFM) replaced Reverend Dwight Baldwin at Waimea. By 1833, Lyons recorded the following observation about the declining population of Hawai‘i Island, “deaths are more numerous than births. Hence the [native] population is decreasing” (Doyle 1953:72 in Maly 1994:23). In 1834, Lyons relocated his family to Hāmākua, staying near the ‘Ele‘io Church in Kanahonua, which would later become the West Hāmākua Hawaiian Church, also known as the Kukuihaele Church and School, directly across Kukuihaele Road. Governor Kuakini had ordered the

construction of the ‘Ele‘io Church in about 1835. Lyons, his wife and son were provided a house to live in by a local chief named Kalaiepu (also spelled Kaleiehu). Of their new accommodations, Lyons wrote the following in his journal:

. . . The doors were so low that we had to stoop in order to get in. The house had no window. Our bed was made of posts driven into the ground; and poles and leaves and mats. Our humble table was made by myself. We were all alone, with no society save that of the natives. To be without luxuries is no trial, but at first the thoughtlessness of the people was painful. But Mrs. L. worked with the women and children and I with the men. The schools flourished. Singing schools were large and made considerable progress. The people brought all kinds of products to exchange for books. . .

Betsy too loved Hamakua, and wrote: The climate is delightful. We live about a half mile from the ocean, and about two miles from the top of Waipio and Waimanu Palis. From our door we have a view of the precipices beyond. . . (Doyle 1953:74 in Maly 1994:23)

Around this time, Lyons also documented the devastating effects on the Waimea and Hāmākua populations as a result of a mumps epidemic combined with a famine brought on by a worm that had infected the crops. In May of 1835, Lyons and his family moved back to Waimea, prior to his departure he estimated the population of Hāmākua to be a little over 4,000 people (Maly 1994). Lyons visited Kanahonua in August of 1835 and remarked on the construction efforts for the church meeting house, which was “...surrounded by a stone wall put up by convicts such as adulterers, etc. This is not my fault if fault it is – I remonstrated against it” (Doyle 1953:93 in Maly 1994:24). In August of 1837, Lyons slept on the floor of the school house and held meetings at Kukuihaele (Maly 1994). In 1841, Lyons estimated the population of Hāmākua as 3,830 and between 1845 and 1848 his journal entries described the poor health and high mortality rate of the native population as a result of starvation, measles, whooping cough, and dysentery.

By the mid-nineteenth century, the ever-growing population of Westerners in Hawai‘i forced socioeconomic and demographic changes that promoted the establishment of a Euro-American style of land ownership. In 1848 the *Māhele ‘Āina* became the vehicle for determining ownership of native lands. This change in land tenure was promoted primarily by the missionaries and Western businessmen in the island kingdom. Generally these individuals were hesitant to enter business deals on leasehold land. The *Māhele* (division) defined the land interests of Kamehameha III (the King), the high-ranking chiefs, and the *konohiki*. The *Māhele* placed all lands in the Kingdom of Hawai‘i in one of three categories: (1) Crown Lands (for the occupant of the throne); (2) Government Lands; and (3) *Konohiki* Lands. The chiefs and *konohiki* were required to present their claims to the Land Commission to receive awards for lands provided to them by Kamehameha III. They were also required to provide commutations to the government in order to receive royal patents on their awards. The lands were identified by name only, with the understanding that the ancient boundaries would prevail until the land could be surveyed. This process expedited the work of the Land Commission.

In the Mahele, the *ahupua‘a* of Kanahonua was retained by Kekauonohi (also spelled Kakaunonohi, she was a high chiefess and granddaughter of Kamehameha I) as LCAw 11216 Apana 50, no Royal Patent) (www.ulukau.org). She was also a niece of Kalanimoku, who served as

Kamehameha's kālaimoku or land administrator and her genealogy tied her to the royal bloodlines of both the Maui and Hawai'i chiefs (Maly 1994). Several *kuleana* were claimed and awarded in the area *makai* of Kukuihaele Park. Three *kuleana* parcels (LCAw. 7859, 7131, and 7874) were awarded within Kanahonua Ahupua'a, all of which were claimed as house lots. LCAw. 7131 awarded to N. Ka'ai was described in the Native Register (N. R. Vol.8:278-279) as enclosed by a stone wall he built himself, where he had resided since 1837. LCAw. 7874, awarded to Wailuahi, is particularly interesting because the claimant was a female who said she received the land from her husband Kaleiehu (N.R. Vol. 8:313).

On September 19, 1853, the 'Ele'io Church lot, located across Kukuihaele Road from the park, was granted to the ABCFM (Maly 1994). On that same day, the one-acre School House Lot at Kanahonua, located north of the current Kukuihaele Park, was formally established as the Kukuihaele School Lot (School Grant 14:5). A 1905 map depicts both the Kukuihaele School lot and the 'Ele'io Church lot, which is labelled "Native Church" (see Figure 12 of Appendix 2). According to Maly (1994), on March 28, 1859, the initial stone structure of 'Ele'io Church was completed. Rev. Lyons' journal entries from early 1860 detailed the labor the residents of Hāmākua undertook to raise funds for the purchase of construction materials and the challenges they had to overcome to build the church at the top of the *pali*.

By 1864, native pastors had taken over the congregations of three churches started by Lyons in Hāmākua (Maly 1994). Maly (1994) reported that despite the fact that native churches typically had cemeteries associated with them, his historical documentation review did not reveal any mention of a cemetery within or adjacent to 'Ele'io Church from its establishment until it was abandoned in 1950. Around 1868, The Roman Catholic Church acquired the lands originally awarded to Ali'i Nui Kekau'ōnohi, comprising the majority of Kanahonua Ahupua'a. Kekau'ōnohi had left her lands to her husband upon her death in 1851. He followed her in death four years later, owing Bishop & Co. a debt of over \$40,000. Maly (1994) suggested that the Roman Catholic Church purchased the land holdings at auction of the chiefess's estate. The parcel marked Catholic Church (see Figure 12 of Appendix 2), located *makai* and to the east of the current study area corresponds with the original location of St. Theresa's Catholic Church and Cemetery. Like most of the foreign owned land throughout the islands, much of the Roman Catholic Church's land was transformed for the cultivation of sugar.

The history of the Hāmākua District and particularly the area centered on Honokaa since 1860 is inextricably linked to the growth of the sugar cane industry. In 1876, Hawaiian laborers planted the first sugar cane crop at the 500-acre Honokaa Sugar Plantation (HSPA Archives, 1989). The plantation was expanded with the creation of the Honokaa Sugar Company in 1878. The following year, its founder, F.A. Schaefer, established another sugar company in Kukuihaele, Pacific Sugar Mill, which operated on its own until 1913, when it sold its mill and began sending its cane to be ground at the Honokaa mill. In 1928, the two were merged under the name of the Honokaa Sugar Company, which eventually grew to more than 9,000 acres, half of which was fee simple lands. Initially, cane was hauled to the railroad or mill by mule- and horse-drawn wagons.

The Pacific Sugar Mill was the most remote of the twenty sugar plantations that sprang up along the Hāmākua coast between 1876 and 1888, with fields located between Waipi'o valley to the north and the Honokaa Sugar Company lands to the south (Dorrance and Morgan 2000). According to Maly, "plantation communities usually developed around earlier Hawaiian – church settlements, and many

kuleana were assimilated into plantation holdings for various reasons” (1994:B-28). Indeed, LCAws 7131, 7859, and 7874 in the vicinity of the project site appear to have been subsumed within the cultivated fields of the Pacific Sugar Mill Plantation. The majority of Kukuihaele Park itself was part of Field 1 of the Pacific Sugar Mill’s land holdings and was planted with sugarcane during the early years of the plantation until the mid-1930s. Plantation-related development located near the project site and Kukuihaele School included multiple structures in Kukuihaele Village and outlying camp, the plantation manager’s house, and plantation infrastructure such as stables, flumes, ditches and roads.

Begun in 1904 and completed in 1910, two ditches were dug by the Hawaiian Irrigation Co. to bring water from the Kohala Mountains. Honokaa Sugar Company took over the irrigation company in 1915 and used the water to flume the harvested cane to the company’s 6½-mile rail system. An inclined tramway was used to transport bags of sugar to the plantation’s warehouse. Beginning in 1919, the company began using a cable extending down the cliff to load the sugar directly onto inter-island steamers for the trip to Honolulu.

The plantation’s work force was initially Hawaiian but was soon expanded with the immigration of Chinese, Portuguese, Japanese, Puerto Rican, Korean, and Filipino workers, many of whom lived in the several hundred houses owned by the plantation. The plantation also provided outdoor cookhouses, bathhouses and laundries that had running water, along with fuel and medical care. Most of the labor eventually was performed by contract workers, who were not provided housing.

The plantation extended from the coast three miles upslope, to the 1,955-foot elevation, with roughly 10 miles of ocean frontage along a high cliff. The region consists of gulches and steep slopes, which presented a variety of challenges for the growing and harvesting of cane. In 1916, Honokaa Sugar Company started the world’s first commercial macadamia nut producer with the planting of trees in areas unsuitable for sugar cane. That same year it started its Honokaa Ranch division with 600 head of cattle on 2,600 acres located above the cane fields. In 1978, the company merged with Laupahoehoe Sugar Company. The new plantation was purchased by Francis Morgan in the early 1980s and renamed the Hamakua Sugar Company. It ceased operations in 1993.

The immigrant laborers established families and there was a great need for schools in Kukuihaele and other plantation villages. Kukuihaele School dates from as far back as at least the 1880s, according to an inventory of structures contained in P&R property records that was done in 1963 by the Department of Education. As of 1963, there were 10 structures with dates spanning the era from 1885 to 1954. The teachers’ cottages were listed as dating from 1915 and 1940. They were built on a parcel separate from the rest of the school that now is the park. That property, TMK 4-8-006:010, comprised five acres acquired by the Territory of Hawai‘i from the “Roman Catholic Church in the Territory of Hawai‘i” in January of 1932. The sugar plantation constructed a ball field (ca. 1940) on the eastern part of the property. This area was maintained by the County and utilized by both the school and the general public. Due to changing demographics and school policy, the school was decommissioned and mostly demolished in 1965. The teachers’ cottages, which were on the separate parcel, remained standing until 1999 when they were finally demolished. In March of 1970, Governor John A. Burns cancelled Executive Order (EO) 527 to the Department of Public Instruction for use of the 5-acre property for educational purposes. Although the County continued to operate the property as a park, it took several decades of

occasional discussion between the County and the State until EO 3990 was finally issued to the P&R on May 9, 2003, for use of the property for park and recreational purposes.

Existing Cultural Resources, Consultation, Impacts and Mitigation Measures

Although the land within the park was formerly part of a traditional landscape that was heavily utilized for cultivation, it has been substantially transformed through former agriculture, use of a portion of the site as a school lot for over half a century, and decades of use as a County park. It does not contain natural features that might be important in gathering or ritual, such as caves, springs, *pu'u*, native forest groves, etc. The vegetation is highly disturbed and does not contain the quality and quantity of resources that would be important for native gathering. There is no evidence that the project site currently supports any traditional resource uses. As part of this EA, an effort was made to obtain information from knowledgeable informants discussed above about any potential traditional cultural properties and associated practices that might be present or have taken place in on the park property. The EA team spoke with Milton Lau Kong, who was born and raised in Waipi'o Valley, with both parents of Chinese and Hawaiian ancestry. He attended 8 years at Kukuihaele School and has lived next to Kukuihaele Park for 40 years. His information on the property and history of Kukuihaele was extremely helpful for understanding the context. Mr. Lau Kong supports improvement of the park, although he recognizes that he personally will be impacted through additional noise. He stated that his concern was for children in the area, and he wanted to see the park regain its recreational importance in his community. He did not see any negative impacts to cultural properties or practices. Similar sentiments were expressed by Gladys Toko, whose father, Victor Hauanio, was the pastor of the Hawaiian Congregationalist Church in Kukuihaele and who has lived in the area her entire life, as well as Lawrence Fujioka, a lifelong resident. Although not every interviewed resident supported improvements (several residents who kindly spoke with our team did not wish to have their comments attributed by name), none indicated that the project site supported traditional cultural uses or that the project would adversely impact cultural practices.

It would not appear that the Proposed Action would have an adverse effect on the cultural/historical resources of the project site. The Office of Hawaiian Affairs, State Historic Preservation Division, and members of the Kukuihaele community were given an opportunity to review the Draft EA, in order to help finalize this determination.

A commenter on the Draft EA said that Kukuihaele Road was significant as the site of a former footpath. The proposed park improvements do not affect the cultural significance of this resource, which was converted into a road over a hundred years ago.

3.2.3 Archaeology and Historic Properties

Existing Environment

As discussed above, the project site is located in the *ahupua'a* of Kanahonua and is part of a large property awarded in the Mahele to the *ali'i* Kekauonohi as LCAw 11216 Apana 50. No *kuleana* were claimed within or directly adjacent to the park. No sites listed in the National or State Registers of Historic Sites are present on or near the project site. The land use history consists of traditional farming and then, perhaps, sugar cane farming in the mid-19th century. In the 1880s, the Territorial Board of

Education established a school in Kukuihaele next to what is now the park, and sometime after that built structures and conducted other land uses on the western side of what is now the park property itself. These included the teachers' cottages (a four-cottage building under one roof) and the garden behind it. The basketball court is a remnant of the school, which was finally decommissioned in the 1960s. The buildings, including the teachers' cottages, were eventually dismantled. The school property was divided into five house lots which were made available for sale to residents through a lottery. The cottage, garden and basketball court area became part of park maintained by the County of Hawai'i, that also included the ballfield to the east that had been constructed by the plantation in about the 1950s.

The park appears to have been almost completely disturbed by bulldozing and park infrastructure development at various times in the past. It has been fully graded except for a few steep slopes and push piles of rocks, and the topography and retaining walls clearly indicate areas with substantial fill. Although the site used to house structures – the Kukuihaele School teacher's cottages – they were dismantled long ago and the ground around so heavily graded such that no visible traces remain.

Professional archaeologists conducted an assessment of the project site (see Appendix 2). Fieldwork, consisting of 100% pedestrian survey, was conducted on October 9, 2015 by Matthew R. Clark, B.A and Lauren Kupa'a under the direction of Robert B. Rechtman, Ph.D. The surface of the entire park, including the overgrown areas along the boundaries, was examined for extant archaeological remains; none were encountered. All of the existing park infrastructure, including three concrete slabs for picnic tables and the concrete basketball court, appear less than fifty years old. Portions of several other broken concrete slabs that were also likely formerly foundations for picnic tables have been moved to the edge of the ball field for eventual disposal. No evidence of the former teacher's duplex cottage was identified.

Impacts and Mitigation Measures

Because of the extensive physical disturbance of the surface and the lack of manmade structures older than 50 years, the archaeologists concluded that the proposed improvements to Kukuihaele Park would not affect any historic properties. With respect to the historic preservation review process of the Department of Land and Natural Resources–State Historic Preservation Division (DLNR–SHPD), the recommendation was that no further work needs to be conducted prior to or during project implementation. As a precaution, it was recommended in the unlikely event that significant archaeological resources are discovered during the implementation of the proposed park improvement project, work should cease in the area of the discovery and DLNR-SHPD contacted pursuant to HAR 13§13-280-3. The archaeological assessment survey was provided to SHPD on October 20, 2015. As of March 3, 2016, SHPD had not responded.

3.3 Infrastructure

3.3.1 Utilities

Existing Facilities and Services and Impacts

The required utilities of County water service and HELCO electrical power are present at the site. There is an existing 6-inch water main under Kukuihaele Road. According to an October 15, 2015 letter from the

Hawai'i County Department of Water Supply (DWS) in response to early consultation (see Appendix 1a), the property has three existing service laterals each capable of accommodating a 5/8-inch meter and limited to an average daily usage of 400 gallons. DWS stated that the Kukuihaele Water System does not have sufficient capacity to provide additional water at this time. The project may retain the existing laterals and services or may construct a new upsized water lateral with an upsized meter from the existing 6-inch water main under Kukuihaele Road. Water calculations conducted for the project indicate an average daily use of 1,350 gallons, slightly over the average daily use of 1,200 gallons nominally supplied by three 5/8-inch meters. The Draft EA was sent to DWS for review. P&R is coordinating with the Hawai'i Fire Department to determine how to address fire protection requirements in the context of the existing municipal water system.

Electrical service is needed inside the pavilion and for lighting at the pavilion, comfort station and parking lot. This would be provided for the site from the existing overhead electric lines running parallel to Kukuihaele Road. The project would remove existing portable toilets and install a new comfort station with associated septic tank and leach field.

Two utility easements exist on project site, a 5-foot wide easement along the western border of the property for electrical transmission, and a 22,898-sf easement on the southeast corner of the property to Hawaiian Telephone for equipment. As shown on the Site Plan in Figure 4, no proposed facilities encroach on these easements.

It is expected to be determined that the proposed improvements would require some upgrades to utility infrastructure but would not have any substantial impact on existing utilities.

3.3.2 Roadways and Traffic

Existing Conditions

Kukuihaele Park is served by Kukuihaele Road (see Figure 1 for map and Figure 3 for photographs), a small County road that bisects the village lengthwise. This road was the main route between Honokaa and Waipi'o Valley before State Route (SR) 240 was constructed in the 1960s, bypassing the town on the *mauka* side. No traffic data are available for this County road, but observation during three weekdays indicates that traffic is very light. Observations during three one-hour, non-peak periods tallied traffic levels of less than one vehicle per minute (60 vehicles per hour). This road serves both local residents and some visitors who drive on Kukuihaele Road to shop at local stores and/or take an alternate way to or from the Waipi'o Lookout. In the vicinity of the park, the road is striped for travel in two directions. With eight-foot lanes and no shoulders, it is narrow enough to require two-way traffic to slow considerably when vehicles approach each other. TMK 4-8-006:010 has a 10-foot wide setback on Kukuihaele Road for eventual road widening. An alternate access to the park from vehicles on SR 240 is via Mud Lane.

Impacts and Mitigation Measures

The improvements would cause traffic to increase, particularly when there were games on the baseball field or events in the pavilion. Based on experiences with similar County parks in the area, visitation is generally light except during such events, which usually only occur a small fraction of the time. The

extent to which the improved park would be utilized by visitors is unknown. Currently, many visitors require restrooms during their visit to Waipi'o Lookout, and if a comfort station were available at the improved park, it might induce a stop. This would be particularly likely if the availability of a restroom became well known through signage, guidebooks, smart-phone apps, etc. Although it is unlikely that the volume of tourist visits would overwhelm the park – a look at the existing Waipi'o Lookout would confirm the upper limit to visitation – it would be yet another source of traffic on Kukuihaele Road. Nevertheless, traffic would still remain generally light and no significant effect on the function of the road would occur. By letter of August 31, 2015 (see Appendix 1a), the Police Department also stated in response to early consultation that it did not foresee any significant impact to traffic and/or public safety concerns with the proposed improvements. P&R intends to monitor the situation with the Department of Public Works to determine if any mitigation such as road widening, shoulder pullouts, signage or other measures are necessary. Separate efforts that are gradually developing a visitor center on the former Rice Property near Waipi'o Lookout offer a long-term solution for visitor restrooms. The project as proposed does not insert any improvements that would conflict with the 10-foot wide road widening setback on Kukuihaele Road.

There is currently no marked, paved or accessible parking on the site, which the proposed project provides. Events that require hundreds of parking spaces – which are infrequent, and are accommodated by parking on the former ballfield and in other grass areas of the site – will no longer be accommodated on the site once the ballfield is restored to ballfield use. Events that have slightly over 30 vehicles can be accommodated by on-road parking. The County will continue to monitor this situation.

Several commenters opposed the idea of paved parking. P&R noted that while unpaved parking can be acceptable in certain situations, unless a very robust base is constructed, it tends to degrade with heavy use and eventually becomes rutted and prone to poor drainage and mud puddles. Paved parking is more cost-efficient in these situations, and ultimately has less severe visual impacts. Because the park is constructed on a significant slope, the propensity for rain runoff to erode a parking lot constructed of gravel must be considered. Gravel requires significantly more maintenance to ensure it is compacted to minimize erosion and slipping due to unstable footing. The simple act of turning a vehicle's tires destabilizes the top layer of a gravel surface leading to potholes and erosion as well as creating a nuisance from gravel on nearby lawns and concrete walkways. In addition, unpaved parking is not accessible for those with disabilities.

3.4 Secondary and Cumulative Impacts

The Proposed Action will not involve any substantial secondary or cumulative impacts, such as population changes or effects on public facilities.

Cumulative impacts result when implementation of several projects that individually have limited impacts combine to produce more severe impacts or conflicts in mitigation measures. Consultation of EA/EIS files in the *OEQC Environmental Notice* and records of Special Permits, Use Permits and Special Management Area Permits did not reveal any projects of a scale substantial enough to potentially interact with the proposed park improvements. In any case, the Proposed Action will have very limited and temporary construction period impacts, such as noise, traffic, dust and sedimentation, which would be unlikely to accumulate with similar impacts from nearby projects if any are proposed in the future. Operationally,

future traffic impacts from the park in combination from the low expected traffic growth in the area would be non-significant.

3.5 Required Permits and Approvals

The following permits and approvals would be required:

- National Pollutant Discharge Elimination System Permit (State DOH)
- Individual Wastewater System Permit (IWS) (State DOH)
- Grading, Grubbing and Work Within County Right-of-Way Permits (County DPW)
- Building Permits and Plan Approval (County DPW and Planning)
- Chapter 6e, HRS, determination from State Historic Preservation Division on historic property effects
- Disability and Communication Access Board (DCAB) plan review and approval

3.6 Consistency with Government Plans and Policies

3.6.1 Hawai‘i State Plan

Adopted in 1978 and last revised in 1991 (Hawai‘i Revised Statutes, Chapter 226, as amended), the Plan establishes a set of themes, goals, objectives and policies that are meant to guide the State’s long-run growth and development activities. The three themes that express the basic purpose of the *Hawai‘i State Plan* are individual and family self-sufficiency, social and economic mobility and community or social well-being. The Proposed Action would promote these goals by improving recreational facilities and expanding recreational opportunities for the project area, thereby enhancing quality-of-life and community and social well-being.

3.6.2 Hawai‘i State Land Use Law

Hawai‘i State Land Use District. All land in the State of Hawai‘i is classified into one of four land use categories – Urban, Rural, Agricultural, or Conservation – by the State Land Use Commission, pursuant to Chapter 205, HRS. The property is in the State Land Use Urban District. The Proposed Action for continuing use of the project site as a park is consistent with intended uses for this Land Use District.

3.6.3 Hawai‘i County Zoning

The project site is zoned Single Family Residential, minimum lot size 15,000 square feet (RS-15), which allows for the existing use and proposed improvements, provided they receive plan approval from the Planning Director, per Hawai‘i County Code Section 25-4-11(c).

3.6.4 Hawai‘i County General Plan

The *General Plan* for the County of Hawai‘i is a policy document expressing the broad goals and policies for the long-range development of the Island of Hawai‘i. The plan was adopted by ordinance in 1989 and revised in 2005 (Hawai‘i County Planning Department). The *General Plan* itself is organized into thirteen

elements, with policies, objectives, standards, and principles for each. There are also discussions of the specific applicability of each element to the nine judicial districts comprising the County of Hawai‘i. Most relevant to the proposed project are the following Goal and Policies, and Courses of Action of particular chapters of the General Plan:

RECREATION

12.2 GOALS

- (a) Provide a wide variety of recreational opportunities for the residents and visitors of the County.
- (b) Maintain the natural beauty of recreation areas.
- (c) Provide a diversity of environments for active and passive pursuits.

12.3 POLICIES

- (a) Strive to equitably allocate facility-based parks among the districts relative to population, with public input to determine the locations and types of facilities.
- (c) Recreational facilities shall reflect the natural, historic, and cultural character of the area.
- (d) The use of land adjoining recreation areas shall be compatible with community values, physical resources, and recreation potential.
- (g) Facilities for compatible multiple uses shall be provided.
- (h) Provide facilities and a broad recreational program for all age groups, with special considerations for the handicapped, the elderly, and young children.
- (i) Coordinate recreational programs and facilities with governmental and private agencies and organizations. Innovative ideas for improving recreational facilities and opportunities shall be considered.

12.4 STANDARDS

and

12.5.8.2 COURSES OF ACTION FOR HĀMĀKUA

- (a) Expand and /or develop recreational facilities in existing communities.

Discussion: The Proposed Action is an appropriately scaled recreational project that satisfies recreational goals, policies, standards and courses of action with minimal impact. No new County park projects or improvements, including Kukuihaele Park, are specifically listed among courses of action for the area west of Honokaa.

HISTORIC SITES

6.2 GOALS

- (a) Protect, restore, and enhance the sites, buildings, and objects of significant historical and cultural importance to Hawai‘i.
- (b) Appropriate access to significant historic sites, buildings, and objects of public interest should be made available.

Discussion: The Proposed Action has involved an archaeological assessment and coordination with SHPD concerning potential historic properties to ensure there are no adverse effects to significant historic sites. Therefore the action satisfies relevant goals, policies, and courses of action for historic sites in Hawai‘i County.

NATURAL BEAUTY

7.2 GOALS

- (a) Protect, preserve and enhance the quality of areas endowed with natural beauty, including the quality of coastal scenic resources.
- (b) Protect scenic vistas and view planes from becoming obstructed.
- (c) Maximize opportunities for present and future generations to appreciate and enjoy natural and scenic beauty.

7.3 POLICIES

- (h) Protect the views of areas endowed with natural beauty by carefully considering the effects of proposed construction during all land use reviews.
- (i) Do not allow incompatible construction in areas of natural beauty.

Discussion: The Proposed Action does not involve scenic areas or vantages and would not be inconsistent with the natural beauty of the Hāmākua area. Therefore the action is consistent with relevant goals, policies, and courses of action of the Natural Beauty section of the Hawai‘i County General Plan.

NATURAL RESOURCES

8.2 GOALS

- (a) Protect and conserve the natural resources from undue exploitation, encroachment and damage.
- (b) Provide opportunities for recreational, economic, and educational needs without despoiling or endangering natural resources.
- (c) Protect and promote the prudent use of Hawaii’s unique, fragile, and significant environmental and natural resources.
- (e) Protect and effectively manage Hawaii’s open space, watersheds, shoreline, and natural areas.

8.3 POLICIES

- (b) Encourage a program of collection and dissemination of basic data concerning natural resources.
- (h) Encourage public and private agencies to manage the natural resources in a manner that avoids or minimizes adverse effects on the environment and depletion of energy and natural resources to the fullest extent.
- (i) Encourage an overall conservation ethic in the use of Hawaii’s resources by protecting, preserving, and conserving the critical and significant natural resources of the County of Hawaii.
- (u) Ensure that activities authorized or funded by the County do not damage important natural resources.

Discussion: The Proposed Action does not involve destruction of natural resources and is consistent with the goals, standards and policies of the Natural Resources chapter of the Hawai‘i County General Plan.

The *Hawai‘i County General Plan Land Use Pattern Allocation Guide (LUPAG)*. The LUPAG map component of the *General Plan* is a graphic representation of the Plan’s goals, policies, and standards as

well as of the physical relationship between land uses. It also establishes the basic urban and non-urban form for areas within the planned public and cultural facilities, public utilities and safety features, and transportation corridors. The project site is classified as Low Density Urban in the LUPAG. Improvement of the project site's already existing recreational facilities on a property dedicated by Executive Order for recreational use is not inconsistent with this designation.

3.6.5 Hāmākua Community Development Plan

The project is within the Hāmākua Community Development Plan (CDP) planning area. Although the CDP has not yet been adopted, a draft is under consideration by the CDP Steering Committee, according to a letter from the Planning Department (see Appendix 1a). Among the Hāmākua Community Development Plan Community Objectives adopted by the Steering Committee on February 5, 2013, the Planning Department noted the following:

6. Develop and improve critical community infrastructure, including utilities, healthcare, emergency services, affordable housing, educational opportunities and recreational facilities to keep our 'ohana safe, strong and healthy. [bold emphasis added]

The proposed improvements at Kukuihaele Park represent a step in fulfilling this objective by providing a regulation softball/Little League baseball field large enough to support other organized field sports and recreational activities, an improved basketball court, a pavilion, a jogging path, a comfort station, parking and landscaping.

PART 4: DETERMINATION

Based on the findings above, and in consideration of comments received, the County of Hawai'i, Department of Parks and Recreation has determined that the proposed project will not have any significant effect in the context of Chapter 343, Hawai'i Revised Statutes and section 11-200-12 of the State Administrative Rules, and has issued a Finding of No Significant Impact (FONSI).

PART 5: FINDINGS AND REASONS

Chapter 11-200-12, Hawai'i Administrative Rules, outlines those factors agencies must consider when determining whether an Action has significant effects:

1. *The proposed project will not involve an irrevocable commitment or loss or destruction of any natural or cultural resources.* No valuable natural or cultural resources would be committed or lost by the Proposed Action, which would not adversely affect significant historic sites or native species or habitat. The Proposed Action has involved an archaeological assessment and coordination with SHPD concerning potential historic properties to ensure there are no adverse effects to significant historic sites.
2. *The proposed project will not curtail the range of beneficial uses of the environment.* The Proposed Action expands and in no way curtails beneficial uses of the environment, and through the improvements, expands beneficial recreational uses.

3. *The proposed project will not conflict with the State's long-term environmental policies.* The State's long-term environmental policies are set forth in Chapter 344, HRS. The broad goals of this policy are to conserve natural resources and enhance the quality of life. The Proposed Action is minor, environmentally beneficial, and fulfills aspects of these policies calling for an improved social environment by improving and expanding recreational opportunities. It is thus consistent with all elements of the State's long-term environmental policies.
4. *The proposed project will not substantially affect the economic or social welfare of the community or State.* The Proposed Action will benefit the social welfare of the community and State by expanding and improving recreational use of public property for public benefit.
5. *The proposed project does not substantially affect public health in any detrimental way.* The Proposed Action will promote public health through provision of recreational opportunities.
6. *The proposed project will not involve substantial secondary impacts, such as population changes or effects on public facilities.* No secondary effects are expected to result from the Proposed Action, which would not induce in-migration or unduly affect roads or other public facilities.
7. *The proposed project will not involve a substantial degradation of environmental quality.* The Proposed Action is minor and environmentally benign, and would thus not contribute to environmental degradation with adherence to Best Management Practices.
8. *The proposed project will not substantially affect any rare, threatened or endangered species of flora or fauna or habitat.* The project site supports overwhelmingly alien vegetation. Impacts to rare, threatened or endangered species of flora or fauna will not occur, given planned restrictions of the timing of vegetation removal and a hawk survey if necessitated by the construction schedule.
9. *The proposed project is not one which is individually limited but cumulatively may have considerable effect upon the environment or involves a commitment for larger actions.* Effects to resources and conditions, including traffic flow, have been considered from a cumulative perspective. The Proposed Action is not related to other activities in the region in such a way as to produce adverse cumulative effects or involve a commitment for larger actions.
10. *The proposed project will not detrimentally affect air or water quality or ambient noise levels.* Slight increases in noise and effects to air quality will occur, but below levels that would require mitigation.
11. *The project does not affect nor would it likely to be damaged as a result of being located in an environmentally sensitive area such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal area.* The project site is not within a flood plain. Although the project site is in an area with volcanic and seismic risk, the entire Island of Hawai'i shares this risk, and the Proposed Action is not imprudent to undertake.
12. *The project will not substantially affect scenic vistas and viewplanes identified in county or state plans or studies.* The Proposed Action would not adversely impact any scenic sites or viewplanes.
13. *The project will not require substantial energy consumption.* The Proposed Action involves only minor use of energy for construction and operation.

For the reasons above, the Proposed Action would not have any significant effect in the context of Chapter 343, Hawai'i Revised Statutes and section 11-200-12 of the State Administrative Rules.

REFERENCES

- Cordy, R. 1994. *A Regional Synthesis of Hāmākua District, Island of Hawai‘i*. Historic Preservation Division, Department of Land and Natural Resources, State of Hawai‘i.
- Dorrance, W., and F. Morgan. 2000. *Sugar Islands: The 165-Year Story of Sugar in Hawaii*. Honolulu: Mutual Publishing.
- Ellis, W. 1963. (Reprint of 1827 ed.). *Journal of William Ellis*. Honolulu: Advertiser Publishing Co., Ltd.
- Gagne, W., and L. Cuddihy. 1990. “Vegetation,” pp. 45-114 in W.L. Wagner, D.R. Herbst, and S.H. Sohmer, eds., *Manual of the Flowering Plants of Hawai‘i*. 2 vols. Honolulu: University of Hawai‘i Press.
- Giambelluca, T.W., Q. Chen, A.G. Frazier, J.P. Price, Y.-L. Chen, P.-S. Chu, J.K. Eischeid, and D.M. Delparte, 2013: Online Rainfall Atlas of Hawai‘i. *Bull. Amer. Meteor. Soc.*, doi: 10.1175/BAMS-D-11-00228.1.
- Handy, E.S.C., and E.G. Handy. 1991 (rev. ed.). *Native Planters in Old Hawai‘i: Their Life, Lore, and Environment*. *B.P. Bishop Museum Bulletin* 233. Honolulu: Bishop Museum Press.
- Hawai‘i County Planning Department. 2005. *The General Plan, County of Hawai‘i*. Hilo.
- Hawaiian Sugar Planters’ Association Plantation Archives (HSPA), University of Hawai‘i at Manoa Library Hawaiian Collection. 1989. *Register of the Honoka‘a Sugar Company*.
- Heliker, C. 1990. *Volcanic and Seismic Hazards on the Island of Hawai‘i*. Washington: U.S. GPO.
- Kamakau, S. 1961. *Ruling Chiefs of Hawai‘i*. Honolulu: The Kamehameha Schools Press.
- Kelly, M. 1981. “Archaeological and Historical Studies for the Alenaio Stream Flood Damage Reduction Study, Hilo Hawai‘i. Report 1. Background History.” Department of Anthropology, B.P. Bishop Museum, Honolulu. Prepared for U.S. Army Engineer District, Pacific Ocean.
- Kirch, P. 1985. *Feathered Gods and Fishhooks: An Introduction to Hawaiian Archaeology and Prehistory*. Honolulu: University of Hawai‘i Press.
- _____. 2011. *When did the Polynesians Settle Hawai‘i? A Review of 150 Years of Scholarly Inquiry and a Tentative Answer*. *Hawaiian Archaeology* Vol. 12:3-26.
- Lebo, S.A., Dockall, J.E., Olszewski, D.I. 1999. *Life in Waipi‘o Valley, Hawai‘i, 1880-1942*. Bernice P. Bishop Museum, Center for Hawaiian and Pacific Anthropology. Available at <http://www2.bishopmuseum.org/chpa/Waipio/home.htm>

Maly, K. 1994. *Appendix B, Historical Documentary Research*, in PHRI (1994) Archaeological Inventory Survey Kukuihaele Project. PHRI Report 1408-061794 prepared for Kukuihaele Development Company, Hilo.

PHRI. 1993. *Archaeological Inventory Survey, Kukuihaele Project, (Amanresort at Kukuihaele)*. Prep. For Kukuihaele Development Company. PHRI Report 1408-061794 prepared for Kukuihaele Development Company, Hilo.

Pukui, M.K., Elbert, S.H., and E.T. Mookini. 1976. *Place Names of Hawaii*. Honolulu: University of Hawai'i Press.

U.S. Dept. of Commerce, Economics and Statistics Administration, Bureau of the Census, 2010, <http://factfinder2.census.gov/>.

U.S. Fish and Wildlife Service (USFWS). 2015. *USFWS Threatened and Endangered Species System (TESS)*. Washington: GPO. http://ecos.fws.gov/tess_public.

U.S. Geological Survey (USGS). 2000. *Seismic Hazard Maps for Hawaii*. By F.W. Klein, A.D. Frankel, C.S. Mueller, R.L. Wesson and P.G. Okubo.

U.S. Soil Conservation Service. 1973. *Soil Survey of Island of Hawai'i, State of Hawai'i*. Washington: U.S.D.A. Soil Conservation Service.

University of Hawai'i at Hilo, Dept. of Geography. 1998. *Atlas of Hawai'i*. 3rd ed. Honolulu: University of Hawai'i Press.

Wolfe, E.W., and J. Morris. 1996. *Geologic Map of the Island of Hawai'i*. USGS Misc. Investigations Series Map i-2524-A. Washington, D.C.: U.S. Geological Survey.

Kukuihaele Park Improvements

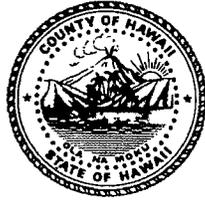
Environmental Assessment

APPENDIX 1a

Comments in Response to Early Consultation

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William P. Kenoi
Mayor



Harry S. Kubojiri
Police Chief

Paul K. Ferreira
Deputy Police Chief

County of Hawai`i

POLICE DEPARTMENT

349 Kapi`olani Street • Hilo, Hawai`i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

August 31, 2015

Mr. Ron Terry
Principal
Geometrician Associates, LLC
P. O. Box 396
Hilo, HI 96721

Dear Mr. Terry:

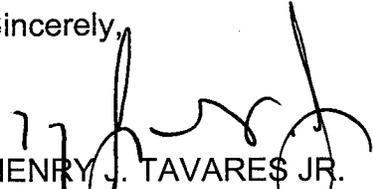
Subject: Early Consultation for Environmental Assessment for Kukuihaele Park Improvements, Hāmākua District, Island of Hawaii, TMK (3) 4-8-006:010 & 051

Staff, upon reviewing the provided documents, does not anticipate any significant impact to traffic and/or other public safety concerns. We are not requesting a copy of the Draft EA when completed.

Thank you for allowing us the opportunity to comment.

If you have any questions, please contact Captain Andrew Burian, Commander of the Hāmākua District, at (808) 775-7533.

Sincerely,



HENRY J. TAVARES JR.
ASSISTANT POLICE CHIEF
AREA I OPERATIONS BUREAU

AB:lli
150550

From: Henry, Sharron [mailto:Sharron.Henry@hawaiicounty.gov]
Sent: Thursday, August 20, 2015 7:48 AM
To: RON TERRY PH. D (rterry@hawaii.rr.com)
Subject: FW: Early consultation for Kukuihaele Park EA

Morning Ron,

DEM has no comments to offer on this project.

Aloha,

Sharron Henry
Private Secretary to the Director
County of Hawai'i
Department of Environmental Management
345 Kekūanāo'a Street, Suite 41
Hilo, HI 96720
Phone: 808.961.8083
Fax: 808.961.8086
Email: Sharron.Henry@hawaiicounty.gov
cohdem@hawaiicounty.gov

<http://www.hawaiicounty.gov/environmental-management>

Hawai'i County is an equal opportunity provider and employer

Ron,

We have no records on file involving any fires, complaints, permits or violations regarding Hazardous materials at Kukuihaele Park, TMK (3) 4-8-006:010 & 51. Let me know if you have any additional questions.

Thanks,

Clinton Baybayan
Fire Prevention Captain
Hawaii Fire Department
Prevention Bureau
(W) 808-932-2913
(F) 808-932-2927

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 16, 2015

Geometrician Associates
Attention: Mr. Ron Terry
P.O. Box 396
Hilo, Hawaii 96721

via email: rterry@hawaii.rr.com

Dear Mr. Terry:

SUBJECT: Early Consultation for Environmental Assessment for Kukuihaele Park Improvements

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the (a) Division of State Parks, (b) Engineering Division and (c) Land Division – Hawaii District on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji", written over a light blue horizontal line.

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RECEIVED
STATE OFFICE



15 AUG 25 10:56 AM 2015
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 24, 2015

MEMORANDUM

- TO: **DLNR Agencies:**
- Div. of Aquatic Resources
 - Div. of Boating & Ocean Recreation
 - Engineering Division
 - Div. of Forestry & Wildlife
 - Div. of State Parks
 - Commission on Water Resource Management
 - Office of Conservation & Coastal Lands
 - Land Division – Hawaii District
 - Historic Preservation

FROM: *fr* Russell Y. Tsuji, Land Administrator *RS*

SUBJECT: Early Consultation for Environmental Assessment for Kukuihaele Park Improvements

LOCATION: South Kona, Hawaii, TMK: (3) 4-8-006:010 & 051

APPLICANT: Geometrician Associates, LLC for the County of Hawaii Department of Parks and Recreation

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by September 15, 2015.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Kevin Moore at 587-0426. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *David S. Quinn*

Print name: David S. Quinn
Date: 8/26/15

cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 24, 2015

MEMORANDUM

TO: FR

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Hawaii District
- Historic Preservation

FROM: P: fr

Russell Y. Tsuji, Land Administrator

SUBJECT:

Early Consultation for Environmental Assessment for Kukuihaele Park Improvements Hanalei District

LOCATION:

~~South Kona~~, Hawaii, TMK: (3) 4-8-006:010 & 051

APPLICANT:

Geometrician Associates, LLC for the County of Hawaii Department of Parks and Recreation

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by September 15, 2015.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Kevin Moore at 587-0426. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: _____

Print name: Cary S. Chang, Chief Engineer

Date: 9/9/15

cc: Central Files

15 AUG 25 PM 10:55 ENGINEERING

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

LD/ Russell Y. Tsuji

**Ref.: Early Consultation for EA for Kukuihaele Park Improvements, Hamakua District
Hawaii.052**

COMMENTS

- () We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone ____.
- (X) **Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone X. The National Flood Insurance Program (NFIP) does not regulate developments within Zone X.**
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ____.
- () Please note that the project site must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

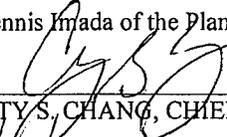
Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- () Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
 - () Mr. Carter Romero (Acting) at (808) 961-8943 of the County of Hawaii, Department of Public Works.
 - () Mr. Carolyn Cortez at (808) 270-7253 of the County of Maui, Department of Planning.
 - () Mr. Stanford Iwamoto at (808) 241-4896 of the County of Kauai, Department of Public Works.
- () The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of any State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.
 - () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

() Additional Comments: _____

() Other: _____

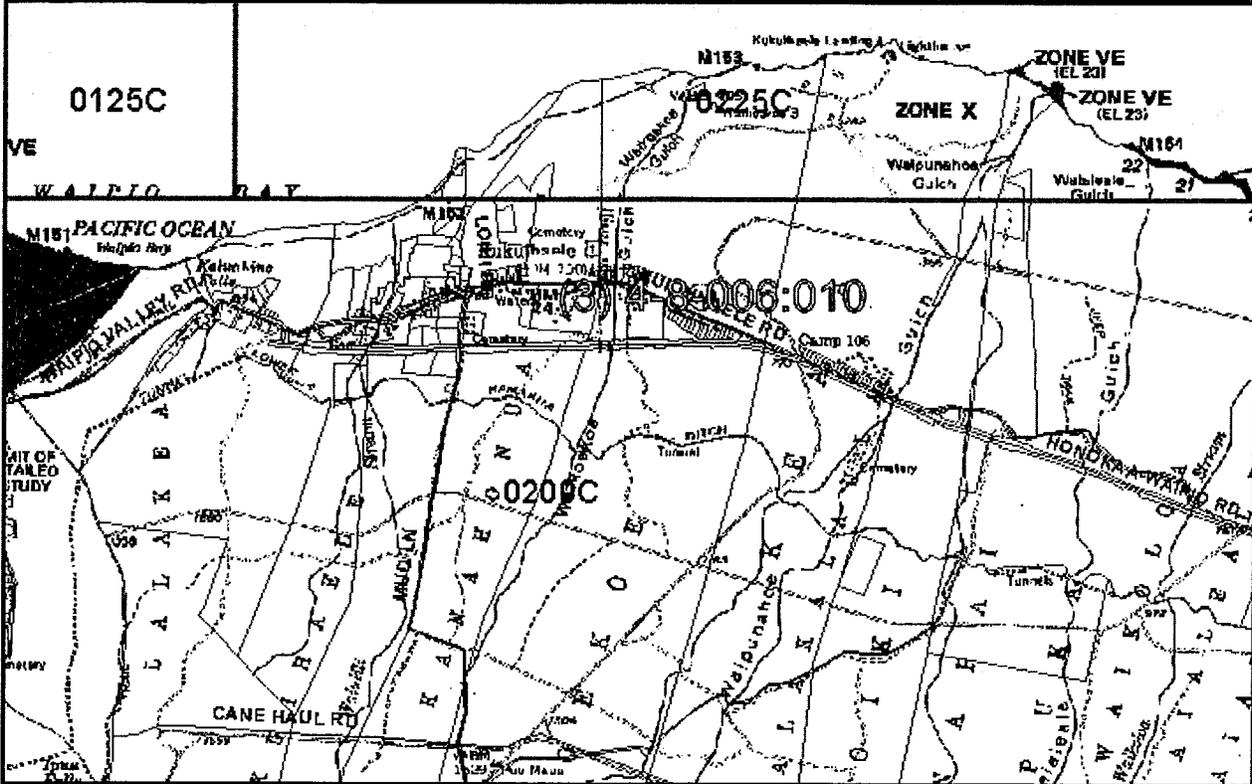
Should you have any questions, please call Mr. Dennis Imada of the Planning Branch at 587-0257.

Signed: 
CARTY S. CHANG, CHIEF ENGINEER

Date: 09/09/15



FLOOD HAZARD ASSESSMENT REPORT



NATIONAL FLOOD INSURANCE PROGRAM

FLOOD ZONE DEFINITIONS

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD – The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water-surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones:

-  **Zone A:** No BFE determined.
-  **Zone AE:** BFE determined.
-  **Zone AH:** Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined.
-  **Zone AO:** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.
-  **Zone V:** Coastal flood zone with velocity hazard (wave action); no BFE determined.
-  **Zone VE:** Coastal flood zone with velocity hazard (wave action); BFE determined.
-  **Zone AEF:** Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE.

NON-SPECIAL FLOOD HAZARD AREA – An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

-  **Zone XS (X shaded):** Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
-  **Zone X:** Areas determined to be outside the 0.2% annual chance floodplain.

OTHER FLOOD AREAS

-  **Zone D:** Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

PROPERTY INFORMATION

COUNTY: HAWAII
 TMK NO: (3) 4-8-006-010
 PARCEL ADDRESS: 48-5350 KUKUIHAELE ROAD
 HONOKAA, HI 96727
 FIRM INDEX DATE: APRIL 02, 2004
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL(S): 1551660200C
 PANEL EFFECTIVE DATE: SEPTEMBER 16, 1988

PARCEL DATA FROM: JUNE 2013
 IMAGERY DATA FROM: MAY 2005

IMPORTANT PHONE NUMBERS

County NFIP Coordinator
 County of Hawaii
 Carter Romero, P.E., CFM (808) 961-8943
State NFIP Coordinator
 Carol Tyau-Beam, P.E., CFM (808) 587-0267

Disclaimer: The Hawaii Department of Land and Natural Resources (DLNR) assumes no responsibility arising from the use, accuracy, completeness, and timeliness of any information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the DLNR, its officers, and employees from any liability which may arise from its use of its data or information.

If this map has been identified as 'PRELIMINARY', please note that it is being provided for informational purposes and shall not be used for flood insurance rating. Contact your county floodplain manager for flood zone determinations to be used for compliance with local floodplain management regulations.

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 24, 2015

MEMORANDUM

TO: **DLNR Agencies:**
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division – Hawaii District
 Historic Preservation

FROM: *fr* Russell Y. Tsuji, Land Administrator *RYT*
SUBJECT: Early Consultation for Environmental Assessment for Kukuihaele Park Improvements
LOCATION: South Kona, Hawaii, TMK: (3) 4-8-006:010 & 051
APPLICANT: Geometrician Associates, LLC for the County of Hawaii Department of Parks and Recreation

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by September 15, 2015.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Kevin Moore at 587-0426. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *Gordon C. Heit*

Print name: GORDON C. HEIT
Date: 9/10/15

cc: Central Files

09 00 27 12 13
RECEIVED
LAND DIVISION
AUG 27 2015
COMMUNICATIONS SECTION

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

75 Aupuni Street, Room 204
Hilo, Hawaii 96720
PHONE: (808) 961-9590
FAX: (808) 961-9599

September 10, 2015

MEMORANDUM

TO: Russell Y. Tsuji, Administrator

FROM: Gordon C. Heit, Hawaii District Land Agent 

SUBJECT: Early Consultation for Environmental Assessment for the County of Hawaii
Department of Parks and Recreation, Kukuihaele Park Improvements

LOCATION: Kanahonua, Hamakua, Island of Hawaii, TMK: (3) 4-8-006:010 & 051

APPLICANT: Geometrician, LLC on behalf of the County of Hawaii, Department of Parks and Recreation

Pursuant to your request for comments on the above matter, we offer the following:

The property identified above is encumbered under E.O. 3990 to the County of Hawaii, Department of Parks and Recreation (P&R). The Land Division will provide further comments when the draft environmental assessment is available for review.

Please contact me should you have any questions.

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

EPO 15-222

September 14, 2015

Mr. Ron Terry, Principal
Geometrician Associates, LLC
P.O. Box 396
Hilo, Hawaii 96721
Via email: rterry@hawaii.rr.com

Dear Mr. Terry:

**SUBJECT: Early Consultation (EC) for Environmental Assessment for Kukuihaele Park Improvements, Hamakua District
TMK: (3) 4-8-006:010 & 051**

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your EC to our office on September 8, 2015. Thank you for allowing us to review and comment on the proposed project. The EC was routed to the District Health Office on Hawaii and the Wastewater Branch. They will provide specific comments to you if necessary. EPO recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments.

Please note that all wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems". We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please review online guidance at: <http://health.hawaii.gov/wastewater> and contact the Planning and Design Section of the Wastewater Branch at 586-4294.

EPO also encourages you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov>

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,

A handwritten signature in black ink, appearing to read "Laura Leialoha Phillips McIntyre".

Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

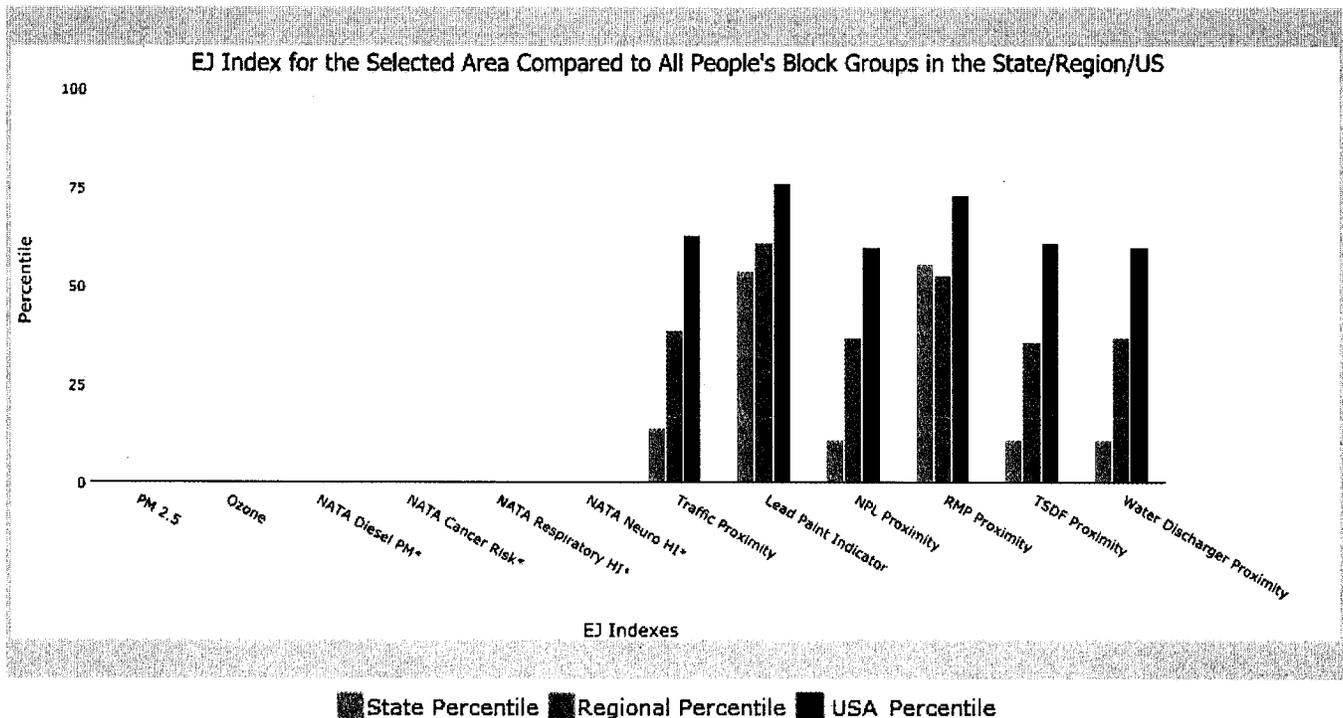
Attachment: U.S. EPA EJSCREEN 3 page report

c: DHO Hawaii, WWB {via email only}

for 1 mile Ring Centered at 20.119608,-155.569723, HAWAII, EPA Region 9

Approximate Population: 315

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	14	39	63
EJ Index for Lead Paint Indicator	54	61	76
EJ Index for Proximity to NPL sites	11	37	60
EJ Index for Proximity to RMP sites	56	53	73
EJ Index for Proximity to TSDFs	11	36	61
EJ Index for Proximity to Major Direct Dischargers	11	37	60



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

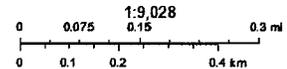


for 1 mile Ring Centered at 20.119608,-155.569723, HAWAII, EPA Region 9

Approximate Population: 315



September 15, 2015
+ Digitized Point



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, SPC, Intermap, and the GIS User Community
Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the

EJSCREEN Report



for 1 mile Ring Centered at 20.119608,-155.569723, HAWAII, EPA Region 9

Approximate Population: 315

Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	46.1	N/A
NATA Diesel PM ($\mu\text{g}/\text{m}^3$) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	8.5	280	11	190	10	110	19
Lead Paint Indicator (% Pre-1960 Housing)	0.35	0.17	78	0.25	67	0.3	63
NPL Proximity (site count/km distance)	0.0032	0.092	8	0.11	0	0.096	0
RMP Proximity (facility count/km distance)	0.32	0.18	87	0.41	70	0.31	76
TSDF Proximity (facility count/km distance)	0.0033	0.092	8	0.12	0	0.054	4
Water Discharger Proximity (facility count/km distance)	0.015	0.33	6	0.19	1	0.25	1
Demographic Indicators							
Demographic Index	42%	51%	19	46%	45	35%	66
Minority Population	71%	77%	28	57%	61	36%	80
Low Income Population	13%	25%	27	35%	18	34%	18
Linguistically Isolated Population	0%	6%	25	9%	20	5%	45
Population With Less Than High School Education	13%	10%	72	18%	48	14%	55
Population Under 5 years of age	8%	6%	70	7%	61	7%	66
Population over 64 years of age	23%	14%	86	12%	90	13%	89

* The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <http://www.epa.gov/ttn/atw/natamain/index.html>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

William P. Kenoi
Mayor



Duane Kanuha
Director

Bobby Command
Deputy Director

West Hawai'i Office
74-5044 Ane Keohokalole Hwy
Kailua-Kona, Hawai'i 96740
Phone (808) 323-4770
Fax (808) 327-3563

County of Hawai'i
PLANNING DEPARTMENT

East Hawai'i Office
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720
Phone (808) 961-8288
Fax (808) 961-8742

September 21, 2015

Mr. Ron Terry
Geometrician Associates
P.O. Box 396
Hilo, HI 96721

Dear Mr. Terry:

SUBJECT: Pre-Consultation on Draft Environmental Assessment
Applicant: County of Hawai'i, Department of Parks & Recreation
Project: Kukuihaele Park Improvements
Tax Map Key: (3) 4-8-006:010 & 051

This is to acknowledge receipt of your August 17, 2015 letter requesting comments from this office regarding the preparation of a Draft Environmental Assessment (DEA) for the subject project.

The County is proposing phased improvements and expansion of the facilities at the Kukuihaele Park. It would include a new parking lot for approximately 24 vehicles, a new comfort station, a new pavilion, an improved basketball court, and a new softball/Little League baseball field, which will include backstops, dugouts, bleachers, and some fencing.

According to the Real Property Tax Office, the 0.0574 acre Parcel 51 was dropped into the 3.968 acre Parcel 10 in 1999. It is zoned Single-Family Residential (RS-15) by the County and designated Urban by the State Land Use Commission. In addition, the Hawai'i County General Plan Land Use Allocation Guide (LUPAG) Map designates the parcel as Low Density Urban (LDU). It is not located within the Special Management Area.

Executive Order No. 3990, approved on April 1, 2003, set aside this land for park and recreational purposes under the control and management of the County of Hawai'i, Department of Parks and Recreation.

Hawai'i County Code Section 25-4-11(c) states that "*Public uses, structures and buildings and community buildings are permitted uses in any district, provided that the director has issued plan approval for such use.*" Therefore, the proposed project will require Plan Approval issued by this office.

Mr. Ron Terry
Geometrician Associates
September 21, 2015
Page 2

In the DEA, describe how the proposed use is consistent with the goals, policies and standards of the County of Hawai'i General Plan, as amended in 2005. Further, the project site is in the Hāmākua Community Development Plan (CDP) planning area. Although the CDP has not yet been adopted, a draft is under consideration by the CDP Steering Committee. Among the Hāmākua Community Development Plan Community Objectives adopted by the Steering Committee on February 5, 2013, we note the following:

- 6: *Develop and improve critical community infrastructure, including utilities, healthcare, emergency services, affordable housing, educational opportunities and recreational facilities to keep our 'ohana safe, strong, and healthy.*

The DEA should include a discussion of the project in relationship to the above referenced objective.

Thank you for the opportunity to provide preliminary comments on the proposed project. Please provide our department with a copy of the DEA for our review and comment.

If you have questions, please contact Esther Imamura of our office at (808) 961-8139.

Sincerely,


DUANE KANUHA
Planning Director

ETI:cs

P:\Wpwin60\ETI\Eadraftpre-Consul\Terry Kukuihaele Park.Rtf

PHONE (808) 594-1888

FAX (808) 594-1938



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
560 N. NIMITZ HWY., SUITE 200
HONOLULU, HAWAII 96817

HRD 15-7609

October 2, 2015

Ron Terry, Principal
Geometrician Associates, LLC
P.O. Box 396
Hilo, Hawaii 'i 96721

Re: Early Consultation for Environmental Assessment for Kukuihaele Park Improvements
Kanāhonua Ahupua'a, Hāmākua Moku, Hawaii 'i Mokupuni
TMK: (3) 4-8-006:010 and 051

Aloha Mr. Terry:

The Office of Hawaiian Affairs (OHA) received your letter dated August 17, 2015, requesting comments on the above-titled project. Given the project descriptions provided, our agency has no comments at this time. Should you have any questions, please contact Everett Ohta at 594-0231 or everetto@oha.org.

'O wau iho nō me ka 'oia 'i'o,

A handwritten signature in black ink, appearing to read "Kamano Crabbe".

Kamana'opono M. Crabbe, Ph.D.
Ka Pouhana, Chief Executive Officer

KC: rg

**Please address replies and similar, future correspondence to our agency:*

*Dr. Kamana'opono Crabbe
Attn: OHA Compliance Enforcement
560 N. Nimitz Hwy., Ste. 200
Honolulu, Hawaii 'i 96817*



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

345 KEKŪANAŌ'A STREET, SUITE 20 • HILO, HAWAII 96720
TELEPHONE (808) 961-8050 • FAX (808) 961-8657

October 15, 2015

Mr. Ron Terry
Geometrician Associates, LLC
P.O. Box 396
Hilo, HI 96721

**Subject: Pre-Environmental Assessment Consultation
Kukuihaele Park Improvements
Tax Map Key 4-8-006:010**

This is in response to your Pre-Environmental Assessment Consultation letter of August 17, 2015.

Please be informed there is an existing 6-inch waterline within Kukuihaele Road fronting the subject parcel which reduces to a 4-inch waterline from the middle of the parcel to the east.

Water availability in the area is restricted to existing services only. There are three (3) existing service laterals installed to the parcel which are capable of accommodating 5/8-inch meters and limited to an average daily usage of 400 gallons. The Kukuihaele Water System does not have sufficient capacity to provide additional water at this time.

Upon receipt and review of the Environmental Assessment, we will request that estimated maximum daily water demand calculations be provided by a professional engineer, licensed in the State of Hawai'i. Based on the calculations provided, we will determine if the existing services are adequate for the proposed park improvements and if any necessary water system improvements are required.

There is an existing fire hydrant fronting the subject parcel. Please be informed that the existing 6-inch waterline within Kukuihaele Road is inadequate to provide the required 2,000-gallons per minute (GPM) fire-flow per the Department's Water System Standards. The applicant should contact the Fire Department to determine any other fire protection requirements or alternatives.

Should there be any questions, please contact Mr. Ryan Quitoriano of our Water Resources and Planning Branch at 961-8070, extension 256.

Sincerely yours,

Ar Keith K. Okamoto, P.E.
Manager-Chief Engineer

RQ:dfg

copy – County of Hawai'i, Department of Parks and Recreation

...Water, Our Most Precious Resource... Ka Wai A Kāne...

The Department of Water Supply is an Equal Opportunity provider and employer.

Kukuihaele Park Improvements

Environmental Assessment

APPENDIX 1b

Comments to Draft EA and Responses

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STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

EPO 15-272

November 13, 2015

Mr. Ron Terry
Geometrician Associates
P.O. Box 396
Hilo, Hawaii 96721
Email: rterry@hawaii.rr.com

Dear Mr. Terry:

SUBJECT: Draft Environmental Assessment (DEA) for Kukuihaele Park Improvements
TMK: (3rd) 4-8-006:010

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your DEA to our office via the OEQC link:

http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Hawaii/2010s/2015-11-08-HA-5B-DEA-Kukuihaele-Park-Improvements.pdf

EPO strongly recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments. EPO has recently prepared draft Environmental Health Management Maps for each county. They are online: <http://health.hawaii.gov/epo/egis>

We suggest you review the requirements for the National Pollutant Discharge Elimination System (NPDES) permit. We recommend contacting the Clean Water Branch at (808) 586-4309 or cleanwaterbranch@doh.hawaii.gov after relevant information is reviewed at:

1. <http://health.hawaii.gov/cwb>
2. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/standard-npdes-permit-conditions>
3. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/forms>

If noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules, Chapter 11-46, "Community Noise Control". A noise permit may be required and should be obtained before the commencement of work. Please call the Indoor and Radiological Health Branch at (808) 586-4700 and review relevant information online at: <http://health.hawaii.gov/irhb/noise>

Mr. Ron Terry
Page 2
November 13, 2015

EPO encourages you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov> You may also wish to review the draft OEQC viewer at: <http://eha-web.doh.hawaii.gov/oeqc-viewer> This viewer geographically shows where previous Chapter 343 documents have been prepared.

In order to better protect public health and the environment, the U.S. Environmental Protection Agency (EPA) has developed a new environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and combines environmental and demographic indicators in maps and reports. EPO encourages you to explore, launch and utilize this powerful tool in planning your project. The EPA EJSCREEN tool is available at: <http://www2.epa.gov/ejscreen>

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,



Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

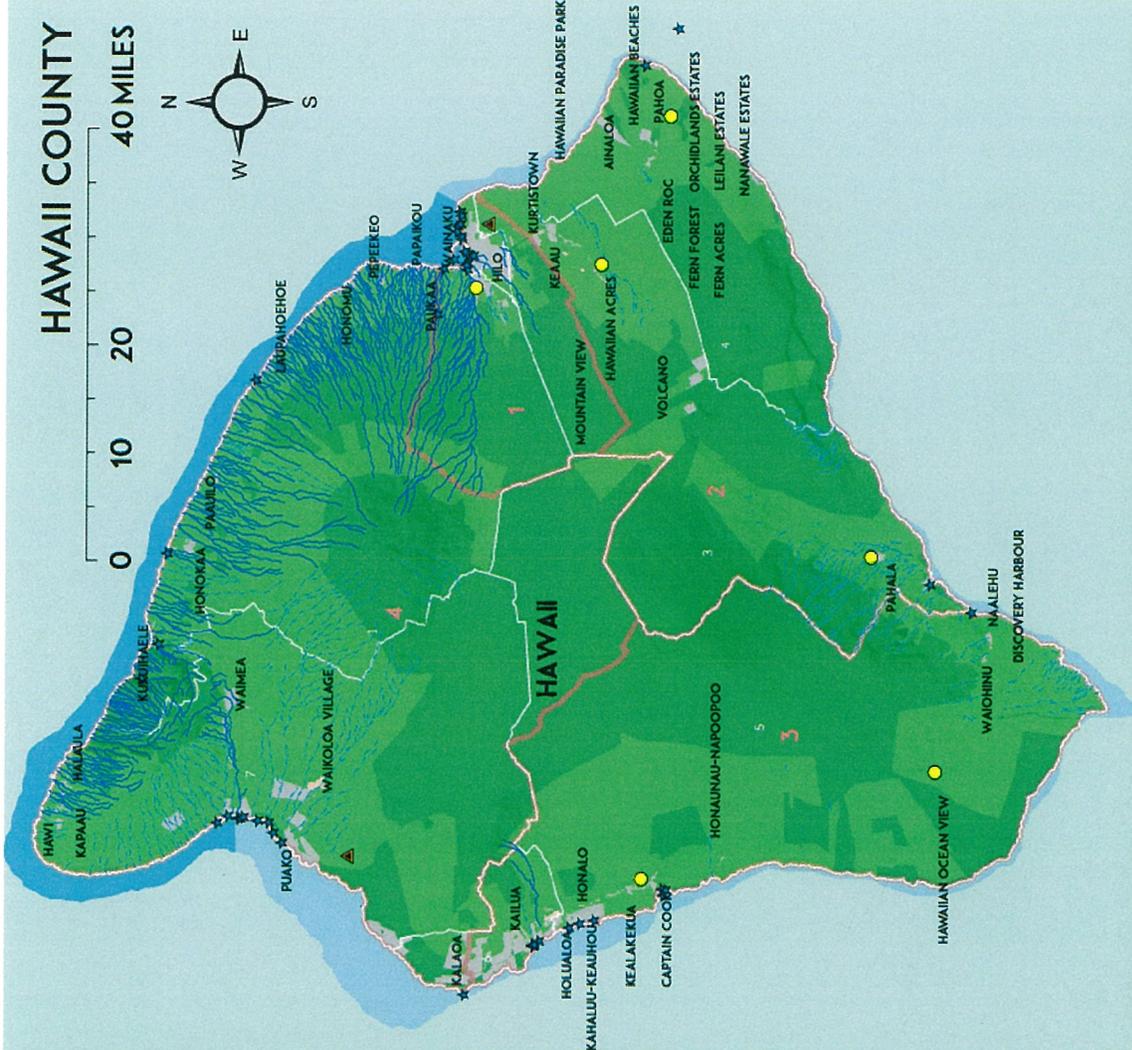
LM:nn

Attachment 1: EPO Draft Environmental Health Management Maps (2-Hawaii County and Kukuiahaele)
Attachment 2: OEQC Viewer Map
Attachment 3: U.S. EPA EJSCREEN 3 page report

c: James Komata, Department of Parks and Recreation
DOH: DHO HI, CWB, SDWB, and IRHB (via email only)

LEGEND

-  AIR QUALITY MONITORING SITES
-  ACTIVE LANDFILLS
-  WATER QUALITY MONITORING SITES
-  PERENNIAL STREAMS
-  NON-PERENNIAL STREAMS
-  A CLASS WATER QUALITY
-  AA CLASS WATER QUALITY
-  HOUSE DISTRICTS
-  SENATE DISTRICTS
-  AGRICULTURAL
-  CONSERVATION
-  RURAL
-  URBAN



ENVIRONMENTAL HEALTH MANAGEMENT ON HAWAII

MAP INTENDED FOR ILLUSTRATIVE PURPOSES ONLY. SITE LOCATIONS ARE APPROXIMATE.

LEGEND

-  AIR QUALITY MONITORING SITES
-  ACTIVE LANDFILLS
-  WATER QUALITY MONITORING SITES
-  PERENNIAL STREAMS
-  NON-PERENNIAL STREAMS
-  A CLASS WATER QUALITY
-  AA CLASS WATER QUALITY
-  HOUSE DISTRICTS
-  SENATE DISTRICTS
-  AGRICULTURAL
-  CONSERVATION
-  RURAL
-  URBAN



ENVIRONMENTAL GEOGRAPHIC
INFORMATION SYSTEM 2015
THE ENVIRONMENTAL PLANNING OFFICE



 Stay Connected 

OEQC Viewer

0 sites found

Results Filter

 Show sites with no location

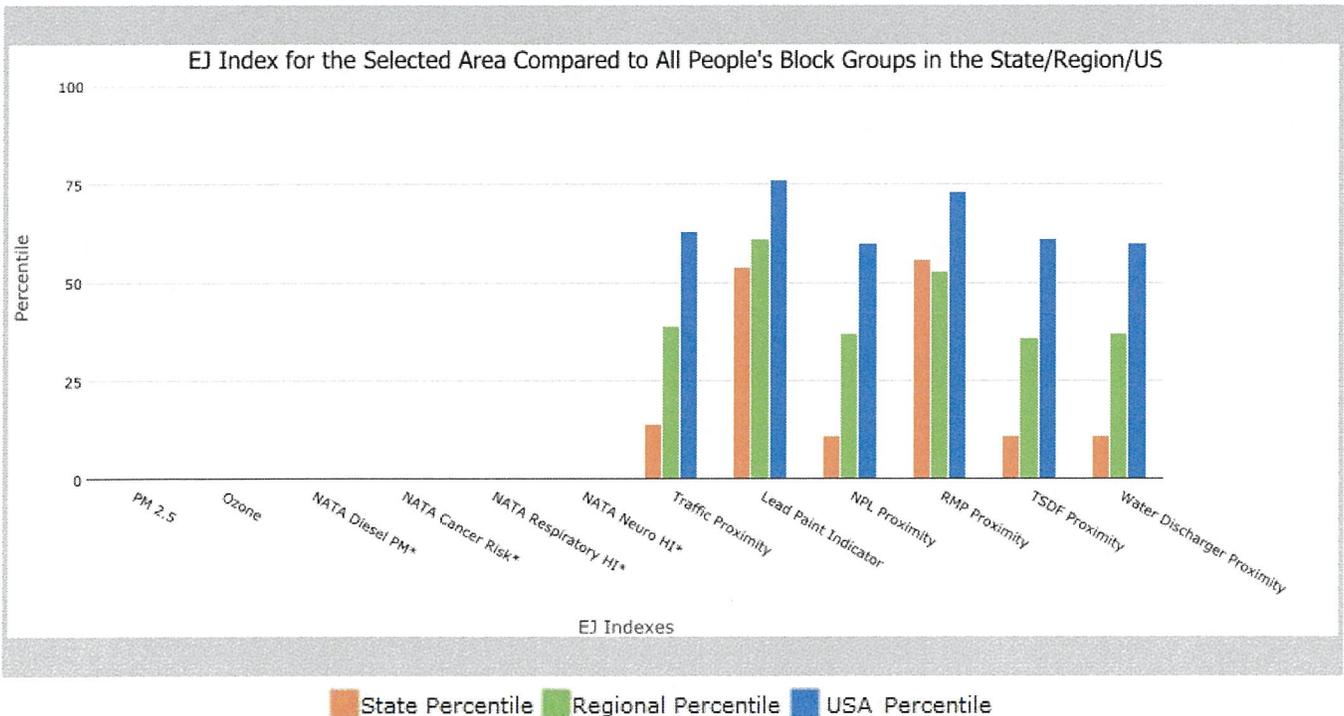


Map data ©2015 Google Imagery ©2015 DigitalGlobe Imagery ©Report a map error

for 1 mile Ring Centered at 20.120665,-155.569835, HAWAII, EPA Region 9

Approximate Population: 315

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
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EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
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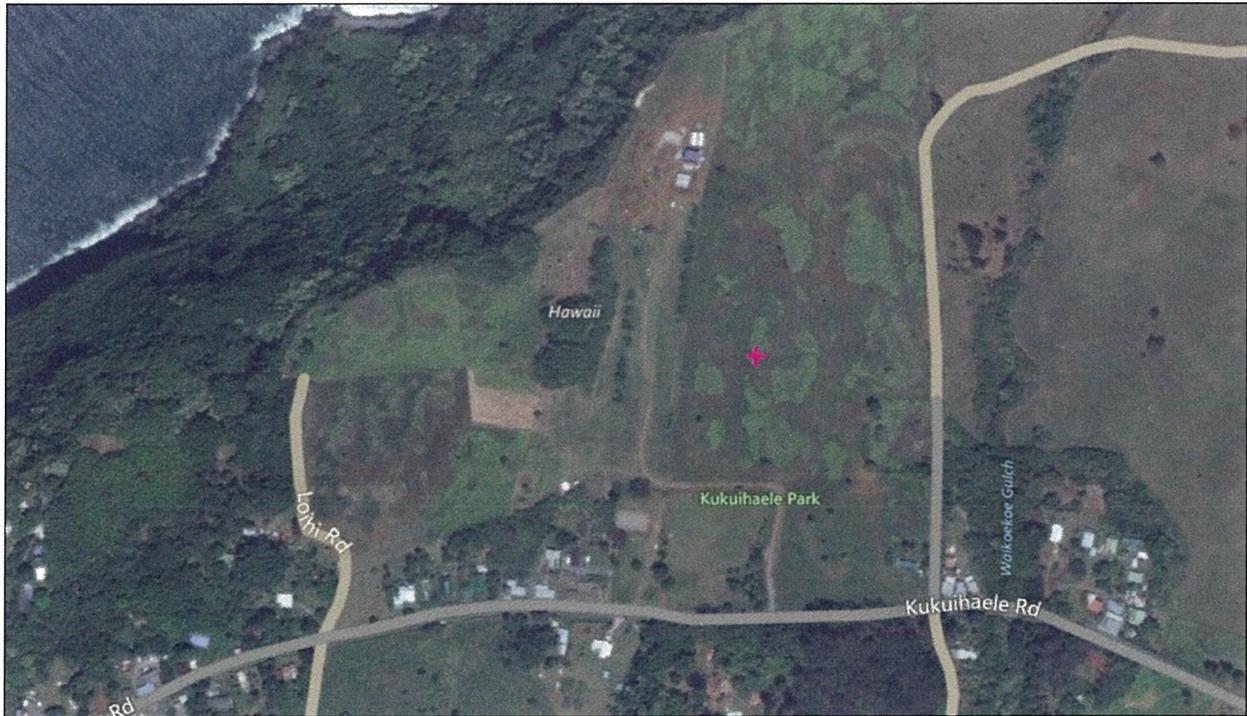
This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

EJSCREEN Report



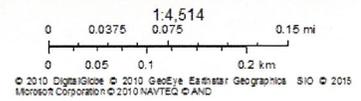
for 1 mile Ring Centered at 20.120665,-155.569835, HAWAII, EPA Region 9

Approximate Population: 315



November 12, 2015

+ Digitized Point



Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	46.1	N/A
NATA Diesel PM ($\mu\text{g}/\text{m}^3$) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	8.5	280	11	190	10	110	19
Lead Paint Indicator (% Pre-1960 Housing)	0.35	0.17	78	0.25	67	0.3	63
NPL Proximity (site count/km distance)	0.0032	0.092	8	0.11	0	0.096	0
RMP Proximity (facility count/km distance)	0.32	0.18	87	0.41	70	0.31	76
TSDF Proximity (facility count/km distance)	0.0033	0.092	8	0.12	0	0.054	4
Water Discharger Proximity (facility count/km distance)	0.015	0.33	6	0.19	1	0.25	1
Demographic Indicators							
Demographic Index	42%	51%	19	46%	45	35%	66
Minority Population	71%	77%	28	57%	61	36%	80
Low Income Population	13%	25%	27	35%	18	34%	18
Linguistically Isolated Population	0%	6%	25	9%	20	5%	45
Population With Less Than High School Education	13%	10%	72	18%	48	14%	55
Population Under 5 years of age	8%	6%	70	7%	61	7%	66
Population over 64 years of age	23%	14%	86	12%	90	13%	89

* The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <http://www.epa.gov/ttn/atw/natamain/index.html>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

geometrician

A S S O C I A T E S , L L C

integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Laura Leialoha McIntyre, Program Manager
Hawai'i State Department of Health EPO
epo@doh.hawaii.gov

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

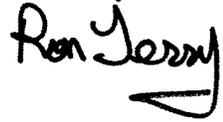
Dear Ms. McIntyre:

Thank you for your comment letter dated November 13, 2015, on the Draft EA. In answer to your specific comments:

1. *EPO standard comments, Environmental Health Portal and Water Quality Standards.* Thank you for referencing these websites.
2. *Need for NPDES permit, Clear Air Permit and Community Noise Control compliance.* As discussed in Section 3.1.2 of the Draft EA, landclearing and construction activities, including parking, would occur in an area greater than one acre, and thus will require a National Pollutant Discharge Elimination System (NPDES) permit to ensure that erosion and sedimentation impacts to adjacent waters will be minimized. No aspect of the project involves air emissions, and no Clean Air Permit is needed. As discussed in Section 3.1.4 of the EA, the County will require the contractor to limit construction to daytime hours and consult with the Department of Health pursuant to Title 11, Chapter 46, HAR (Community Noise Control) if construction noise is excessive and requires mitigation. Operationally, the proposed project would slightly elevate noise levels, but if existing County neighborhood parks may be used as a guide, there will be no violation of noise standards.
3. *EPA EJSCREEN.* Thank you for the reference to the EPA site and the information you provided. The project is highly consistent with environmental justice, in that it has no disproportionately adverse impacts on low-income and minority populations, and it provides a low-income district with critical recreational infrastructure.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a prominent loop at the end of the name.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

William P. Kenoi
Mayor



Duane Kanuha
Director

Bobby Command
Deputy Director

West Hawai'i Office
74-5044 Ane Keohokalole Hwy
Kailua-Kona, Hawai'i 96740
Phone (808) 323-4770
Fax (808) 327-3563

County of Hawai'i
PLANNING DEPARTMENT

East Hawai'i Office
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720
Phone (808) 961-8288
Fax (808) 961-8742

December 8, 2015

Mr. Ron Terry
Geometrician Associates
P.O. Box 396
Hilo, HI 96721

Dear Mr. Terry:

SUBJECT: Draft Environmental Assessment
Applicant: County of Hawai'i, Department of Parks and Recreation
Project: Kukuihaele Park Improvements
TMK(s): (3) 4-8-006:010, Hāmākua, Hawai'i

This is in response to your letter received on November 6, 2015, requesting our comments on the above-referenced project.

We provided preliminary comments by letter dated September 21, 2015 for the proposed project and have no additional comments on the Draft Environmental Assessment.

If you have questions, please feel free to contact Esther Imamura of our office at (808) 961-8139.

Sincerely,


DUANE KANUHA
Planning Director

ETI
P:\Wpwin60\ETI\Eadraftpre-Consu\Terry Kukuihaele Park Imps DEA.Docx

cc: Mr. James Komata
Department of Parks & Recreation

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integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Duane Kanuha, Director
Hawaii County Planning Department
101 Pauahi Street, Suite 3
Hilo HI 96720

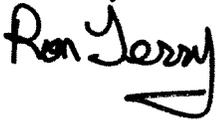
Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Kanuha:

Thank you for the comment letter dated December 8, 2015, in which you stated that your agency provided preliminary comments by letter dated September 21, 2015 for the proposed project and had no additional comments on the Draft EA.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 7, 2015

Geometrician Associates, LLC
Attention: Mr. Ron Terry
P.O. Box 396
Hilo, Hawaii 96721

via email: rterry@hawaii.rr.com

County of Hawaii
Department of Parks and Recreation
Attention: Mr. James Komata
101 Pauahi Street, Suite 6
Hilo, Hawaii 96720

via email: jkomata@co.hawaii.hi.us

Dear Messrs. Terry and Komata:

SUBJECT: Draft Environmental Assessment (DEA) and Anticipated Finding of No Significant Impact (FONSI) for the Kukuihaele Park Improvements

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division, (b) Land Division – Hawaii District and (c) Division of State Parks on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".
Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 16, 2015

MEMORANDUM

TO: PR:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Hawaii District
- Historic Preservation

FROM: P. A

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Assessment (DEA) and Anticipated Finding of No Significant Impact (FONSI) for the Kukuihaele Park Improvements

LOCATION:

Hamakua, Island of Hawaii; TMK: (3) 4-8-006:010

APPLICANT:

Geometrician Associates, LLC for the County of Hawaii, Department of Parks and Recreation

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **December 4, 2015**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on the Current Environmental Notice under Quick Links on the right.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Print Name:

Cary S. Chang, Chief Engineer

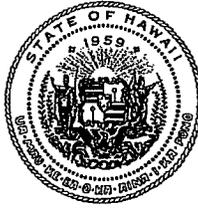
Date:

12/7/15

cc: Central Files

15 NOV 17 AM 11:57 ENGINEERING

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 16, 2015

MEMORANDUM

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Hawaii District
- Historic Preservation

FROM:

R Russell Y. Tsuji, Land Administrator *W*

SUBJECT:

Draft Environmental Assessment (DEA) and Anticipated Finding of No Significant Impact (FONSI) for the Kukuihaele Park Improvements

LOCATION:

Hamakua, Island of Hawaii; TMK: (3) 4-8-006:010

APPLICANT:

Geometrician Associates, LLC for the County of Hawaii, Department of Parks and Recreation

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **December 4, 2015**.

The DEA can be found on-line at: <http://health.hawaii.gov/oegc/> (Click on the Current Environmental Notice under Quick Links on the right.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Print Name:

GORDON C. HEIT

Date:

11/27/15

cc: Central Files

NOV 19 2 10 PM '15
LAND DIVISION
HONOLULU, HAWAII
RECEIVED
NOV 17 2015

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

75 Aupuni Street, Room 204
Hilo, Hawaii 96720
PHONE: (808) 961-9590
FAX: (808) 961-9599

November 23, 2015

MEMORANDUM

TO: Russell Y. Tsuji, Administrator

FROM: Gordon C. Heit, Hawaii District Land Agent 

SUBJECT: Draft Environmental Assessment for the County of Hawaii Department of Parks and Recreation, Kukuihaele Park Improvements

LOCATION: Kanahonua, Hamakua, Island of Hawaii, TMK: (3) 4-8-006:010

APPLICANT: Geometrician, LLC on behalf of the County of Hawaii, Department of Parks and Recreation

Pursuant to your request for comments on the above matter, we offer the following:

The property identified above is encumbered under E.O. 3990 to the County of Hawaii, Department of Parks and Recreation (P&R). The improvements and expansion of facilities at the Kukuihaele Park as presented in the Draft Environmental Assessment are in compliance with the Executive Order and the Hawaii District Land Office has no objection to the improvements proposed.

Please contact me should you have any questions.

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT



15 NOV 17 24:01 STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 16, 2015

MEMORANDUM

- TO: **DLNR Agencies:**
- Div. of Aquatic Resources
 - Div. of Boating & Ocean Recreation
 - Engineering Division
 - Div. of Forestry & Wildlife
 - Div. of State Parks
 - Commission on Water Resource Management
 - Office of Conservation & Coastal Lands
 - Land Division – Hawaii District
 - Historic Preservation

FROM: *R* Russell Y. Tsuji, Land Administrator

SUBJECT: Draft Environmental Assessment (DEA) and Anticipated Finding of No Significant Impact (FONSI) for the Kukuihaele Park Improvements

LOCATION: Hamakua, Island of Hawaii; TMK: (3) 4-8-006:010

APPLICANT: Geometrician Associates, LLC for the County of Hawaii, Department of Parks and Recreation

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **December 4, 2015**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on the Current Environmental Notice under Quick Links on the right.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*

Print Name: CURT STORRELL

Date: 12.3.15

cc: Central Files

geometrician

A S S O C I A T E S , L L C

integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Russell Y. Tsuji, Administrator
Hawai'i State DLNR Land Division
P.O. Box 621
Honolulu HI 96809

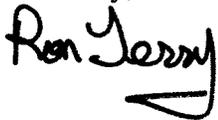
Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Tsuji:

Thank you for your comment letter on the Draft EA dated December 7, 2015. We first wish to acknowledge the "no objection" memo by the Division of State Parks and the "no additional comments" memo by the Engineering Division (which had previously supplied comments concerning the Flood Zone X designation as part of early consultation). We acknowledge the confirmation from the Hawaii District Land Office that the property is encumbered under E.O. 3990 to the County of Hawai'i, Department of Parks and Recreation. Thank you for your assessment that the improvements and expansion of facilities at the Kukuihaele Park as presented in the Draft EA are in compliance with the Executive Order, as well as the statement that the Hawaii District Land Office has no objection to the improvements proposed.

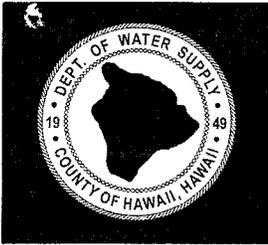
We very much appreciate your review of the document, including circulation to various DLNR agencies. If you have any questions about the EA, please contact me at (808) 969-7090; for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAI'I

345 KEKŪANAŌ'A STREET, SUITE 20 • HILO, HAWAI'I 96720

TELEPHONE (808) 961-8050 • FAX (808) 961-8657

November 30, 2015

Mr. Ron Terry
Geometrician Associates, LLC
P.O. Box 396
Hilo, HI 96721

Dear Mr. Terry:

**Subject: Draft Environmental Assessment
Kukuihaele Park Improvements
Tax Map Key 4-8-006:010**

We have reviewed the subject Draft Environmental Assessment.

As there are three existing 1-inch service laterals, the subject parcel is allotted an average daily use of 1,200 gallons.

The Department has no objection to the proposed park improvements, subject to the following conditions:

1. Although the assessment states that 1,350 gallons is needed, the Department requires that the applicant submit a detailed estimated maximum daily water usage calculation for the proposed park improvements, prepared by a professional engineer licensed in the State of Hawai'i, for review and approval. The water usage calculations should include the total estimated daily water usage in gallons per day (GPD) and the estimated peak flow in gallons per minute (GPM).

Based on the water usage calculations provided, the Department will determine the required water meter size. Also, the existing service laterals shall be cut and plugged at the main.

2. The proposed land use will require the installation of a reduced pressure type backflow prevention assembly within five (5) feet of the meter on private property. The installation of the backflow prevention assembly must be inspected and approved by the Department before water service can be activated.
3. Subject to other agencies' requirements to construct improvements within the road right-of-way fronting the property affected by the proposed development, the applicant shall be responsible for the relocation and adjustment of the Department's affected water system facilities, should they be necessary.

...Water, Our Most Precious Resource... Ka Wai A Kāne...

The Department of Water Supply is an Equal Opportunity provider and employer.

Mr. Ron Terry
Page 2
November 30, 2015

4. The applicant should contact the Fire Department to determine any other fire protection requirements or alternatives.

Should there be any questions, please contact Mr. Ryan Quitariano of our Water Resources and Planning Branch at 961-8070, extension 256.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Kokamoto', written in a cursive style.

Keith K. Okamoto, P.E.
Manager-Chief Engineer

RQ:dfg

copy – County of Hawai‘i, Department of Parks and Recreation

geometrician

A S S O C I A T E S , L L C

integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Keith Okamoto, P.E., Manager-Chief Engineer
Hawai'i County Department of Water Supply
345 Kekuanaoa Street, Suite 20
Hilo HI 96720

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Okamoto:

Thank you for the comment letter on the Draft EA dated November 30, 2015. In response to the specific conditions that need to be addressed, we offer the following:

1. *The Department requires that the applicant submit a detailed estimated maximum daily water usage calculation for the proposed park improvements, prepared by a professional engineer licensed in the State of Hawai'i, for review and approval. The water usage calculations should include the total estimated daily water usage in gallons per day (GPD) and the estimated peak flow in gallons per minute (GPM). Based on the water usage calculations provided, the Department will determine the required water meter size. Also, the existing service laterals shall be cut and plugged at the main.* Subsequent to this letter, P&R has provided the calculations per your specifications and your agency has determined the meter size. P&R has no objection to capping and plugging existing service laterals.

2. *Project requires reduced pressure type backflow prevention assembly within five (5) feet of the meter, which must be inspected and approved by DWS. P&R understands and is agreeable to this.* Please note that due to the 10-foot wide future road widening easement, the backflow preventer is greater than 5 feet from the meter. The line has been concrete jacketed because the distance is greater than 5 feet.

3. *Subject to other agencies' requirements to construct improvements within the road right-of-way fronting the property affected by the proposed development, the applicant shall be responsible for the relocation and adjustment of the Department's affected water system facilities, should they be necessary, P&R currently does not envision that any improvements would affect DWS facilities.* Relocation and adjustment of the existing water system is not necessary as currently designed. Should future improvements be required, the agency proposing the improvements will work with DWS.

4. *Contact the Fire Department.* P&R has coordinated with the Fire Department, which has reviewed the park plans.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

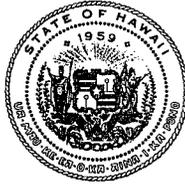
Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, stylized "R" and "T".

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
SAFE DRINKING WATER BRANCH
919 ALA MOANA BLVD., ROOM 308
HONOLULU, HI 96814-4920

In reply, please refer to:
File: SDWB
Kukuihaele.doc

November 13, 2015

Mr. Ron Terry
Geometrician Associates
P.O. Box 396
Hilo, Hawaii 96721

Dear Mr. Terry:

SUBJECT: SAFE DRINKING WATER BRANCH (SDWB) COMMENTS ON THE
DRAFT ENVIRONMENTAL ASSESSMENT (DEA) FOR
KUKUIHAELE PARK IMPROVEMENTS
TMK: (3)4-8-06:010
HAMAKUA DISTRICT, ISLAND OF HAWAII

The SDWB Engineering Section has reviewed the subject document and has the following comments:

1. The DEA indicates that water will be obtained from the County of Hawaii, Department of Water Supply (DWS) and that adequate water may not be available. Please confirm that sufficient water is available for the project from DWS.
2. If another source of water is required for this project, the project may qualify as a public water system. Federal and state regulations define a public water system as a system that serves 25 or more individuals at least 60 days per year or has at least 15 service connections. All public water system owners and operators are required to comply with Hawaii Administrative Rules (HAR), Chapter 11-20, "Rules Relating to Public Water Systems."
3. All new public water systems are required to demonstrate and meet minimum capacity requirements prior to their establishment. This requirement involves demonstration that the system will have satisfactory technical, managerial and financial capacity to enable the system to comply with safe drinking water standards and requirements in accordance with HAR Section 11-20-29.5, "Capacity demonstration and evaluation."

4. Projects that propose development of new sources of drinking water serving or proposed to serve a public water system must comply with the terms of HAR Section 11-20-29, "Use of new sources of raw water for public water systems." This section requires that all new public water system sources be approved by the Director of Health (Director) prior to its use. Such approval is based primarily upon the submission of a satisfactory engineering report which addresses the requirements set in HAR Section 11-20-29.
5. The engineering report must identify all potential sources of contamination and evaluate alternative control measures which could be implemented to reduce or eliminate the potential for contamination, including treatment of the water source. In addition, water quality analyses for all regulated contaminants, performed by a laboratory certified by the State Laboratories Division of the state of Hawaii, must be submitted as part of the report to demonstrate compliance with all drinking water standards. Additional parameters may be required by the Director for this submittal or additional tests required upon his or her review of the information submitted.
6. All sources of public water systems must undergo a source water assessment which will delineate a source water protection area. This process is preliminary to the creation of a source water protection plan for that source and activities which will take place to protect the source of drinking water.
7. Projects proposing to develop new public water systems or proposing substantial modifications to existing public water systems must receive approval by the Director prior to construction of the proposed system or modification in accordance with HAR Section 11-20-30, "New and modified public water systems." These projects include treatment, storage and distribution systems of public water systems. The approval authority for projects owned and operated by a County Board or Department of Water or Water Supply has been delegated to them.
8. All public water systems must be operated by certified distribution system and water treatment plant operators as defined by HAR, Chapter 11-25, "Rules Relating to Certification of Public Water System Operators."
9. All projects which propose the use of dual water systems or the use of a non-potable water system in proximity to an existing drinking water system to meet irrigation or other needs must be carefully designed and operated to prevent the cross-connection of these systems and prevent the possibility of backflow of water from the non-potable system to the drinking water system.

The two systems must be clearly labeled and physically separated by air gaps or reduced pressure principle backflow prevention devices to avoid contaminating the drinking water supply. In addition backflow devices must be tested periodically to assure their proper operation. Further, all non-potable spigots and irrigated areas should be clearly labeled with warning signs to prevent the inadvertent consumption on non-potable water. Compliance with HAR, Chapter 11-21, "Cross-Connection and Backflow Control" is also required.

10. All projects which propose the establishment of a potentially contaminating activity (as identified in the Hawai'i Source Water Assessment Plan) within the source water protection area of an existing source of water for a public water supply should address this potential and activities that will be implemented to prevent or reduce the potential for contamination of the drinking water source.
11. For further information concerning the application of capacity, new source approval, operator certification, source water assessment, backflow/cross-connection prevention or other public water system programs, please contact the SDWB Engineering Section at (808)586-4258.

The SDWB Underground Injection Control (UIC) Program has reviewed the subject document and has the following comments:

1. The project is located mauka of the UIC line. Areas mauka of the UIC line are considered to overly underground sources of drinking water. Therefore, no new subclass A injection wells, such as sewage injection wells that receive greater than 1000 gallons per day, will be allowed to be constructed.
2. If your project involves the construction of a drainage injection well (subclass C injection well), you must first obtain the Department of Health's (DOH) written approval to construct the drainage injection well before any construction commences. HAR, Title 11, Chapter 23, Underground Injection Control (UIC) primary purpose is to protect underground sources of drinking water from injection well contamination. Written approval is obtained by filing an application for a UIC permit. You may submit your permit application via electronic filing through the DOH website at <http://eha-cloud.hawaii.gov/epermit> or submit a hard copy permit application to this address: Safe Drinking Water Branch, 919 Ala Moana Boulevard, Room 308, Honolulu, Hawaii 96814.
3. New drainage injection well construction must be sited beyond one-quarter mile of a drinking water source, which is typically a drinking water well. If you intend

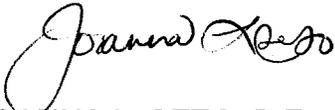
Mr. Ron Terry
November 13, 2015
Page 4

to construct a drinking water well, be careful to site all drainage injection wells at least one-quarter mile away from the drinking water source well.

4. If you have any questions regarding the UIC rules or the UIC permitting process, please contact the SDWB UIC Program at (808)586-4258.

If you have any questions regarding these comments, please contact Mr. Norris Uehara, Supervisor of the SDWB UIC Program or Mr. Michael Miyahira, Supervisor of the SDWB Engineering Section at (808)586-4258 or call from Big Island the direct toll free number 974-4000, ext. 64258.

Sincerely,



JOANNA L. SETO, P.E., CHIEF
Safe Drinking Water Branch

NU:nbp

c: Laura McIntyre, EPO #15-272 (via email)

geometrician

A S S O C I A T E S , L L C

integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Joanna L. Seto, P.E., Chief
Safe Drinking Water Branch
Hawai'i State Department of Health
PO Box 3378
Honolulu HI 96801-3378

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Seto:

Thank you for your comment letter on the Draft EA dated November 13, 2015. In answer to your specific comments:

SDWB Engineering Section

1. *Water availability.* The Department of Parks and Recreation (P&R) continues to coordinate with the Department of Water Supply (DWS). DWS has reviewed and approved the water demand calculations and determined that sufficient water is available for park use.

2-11. *An additional public water system or non-potable water system.* P&R does not contemplate establishing another public water system, potable or non-potable, to supply the modest water needs of the park. In the unlikely event this is ever determined to be necessary, P&R would provide source, storage or transmission improvements that DWS might require in order to qualify for additional water from the existing system.

SDWB Underground Injection Control (UIC) Program

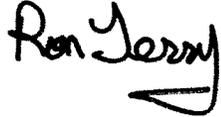
1. *The project is located mauka of the UIC line. Areas mauka of the UIC line are considered to overlie underground sources of drinking water. Therefore, no new subclass A injection wells, such as sewage injection wells that receive greater than 1000 gallons per day, will be allowed to be constructed.* The project does not involve any new subclass A injection wells.

2. *UIC permits.* Specifications for the shallow drywells will be reviewed as part of the Plan Approval process. As their depth does not exceed their width, UIC permits are not required.

3. *Distance to drinking water sources.* There are no drainage injection wells required.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, sweeping flourish at the end.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

TO: Clayton S. Honma, Director
County of Hawaii, Department of Parks and Recreation
101 Pauahi Street, Suite 6
Hilo, HI 96720

Re: Kukuihaele Park Improvements project

December 2, 2015

Dear Mr. Honma,

We, the undersigned residents and property owners of Kukuihaele, are writing to adamantly express the need for an extension to the comment period ending December 8, 2015, for the Draft Environmental Assessment for the Kukuihaele Park Improvements project.

The purpose of the comment period is to provide the public with a Draft Environmental Assessment and the opportunity to make comments. However, with the exception of only one of the undersigned, we were not aware that the Draft EA was accessible, nor that we were able to make comments, until only a few days before the comments deadline.

The purpose of the EA process is to ensure that the public is informed and has the opportunity to participate. This has not happened. In order to conform with the spirit of EA law, we need a 45-day extension of the comments period. Another reason for the extra time is that many of our community members are busy or away due to the holidays.

In addition, those of us who attended one or more of the three community meetings held to discuss the future of the park feel that the meetings were entirely counter-productive. For example, at the meeting, when anyone who was not born and bred in Kukuihaele tried to speak, that person was shot down through ridicule, or bullying, or shouting, or interruption, or simple dismissal. If those meetings are being presented as the "proof" that we had an opportunity to participate, that narrative is flagrantly and unequivocally inaccurate.

Therefore, it is absolutely essential that the comments period be extended so that the public has the chance to read the Draft EA and submit our concerns. This does not apply only to us; it applies to the

entire community, which has been unaware of the existence of the Draft EA and a related comments period.

To not allow an extension would be a grave violation of the purpose and spirit of the EA process.

Thank you.

cc: Valerie Poindexter, Margaret Wille, Gov. David Ige

James Komata

Ron Terry

Billy Kenoi

Mark Nakashima

Tulsi Gabbard

Brian Schatz

Mazin Hirono

Coleen A Lawrence
(Signature)

Coleen A Lawrence
(Printed name)

P.O. box 5078 808 775 9130
Kukuihaele (Address) (Phone) 12/2/15

[Signature] 12/2/15
(Signature)

FRANK ERETTENS
(Printed name)

Box 1118 HONOKAA 775-9979
(Address) (Phone)

Lorraine A. Penfield
(Signature)

Lorraine A. Penfield
(Printed name)

P.O. BOX 1420 KAMUELA 96743
(Address) 775-0086 (Phone) 12/2/15

[Signature] DEC. 2, 2015
(Signature)

RICHARD MASTROIACO 96727
(Printed name)

P.O. BOX 4045 KUKUIHAELE, HI
775-0005
(Address) (Phone)

Dallas Allen 12-2-15
(Signature)

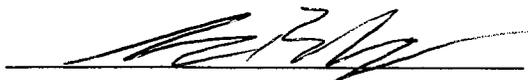
Dallas Allen
(Printed name)

48-5357 Kukuihaele Rd 975
0100
(Address) (Phone)

[Signature]
(Signature)

BRUCE M. STAULAK
48-5528 WAIPIO VALLEY RD
(Printed name)

(BSP) 775-1816 DEC. 2, 2015
(Address) (Phone)


(Signature)

SHANE MORGAN
(Printed name)

48-5374 KUKUIHAELE RD
(Address) HONOKAA (Phone)

12-2-15 808-238-5985


(Signature)

Daniel Warner 12/2/15
(Printed name)

48-5296 KUKUIHAELE RD.
(Address) (Phone) 808-223-4857


(Signature) 12-2-15

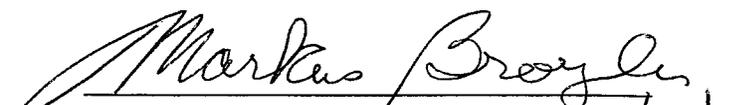
DOUGLAS G. ANDERSON
(Printed name)

Box 1286 KUKUIHAELE 443-2001
(Address) (Phone)


(Signature) 12-2-15

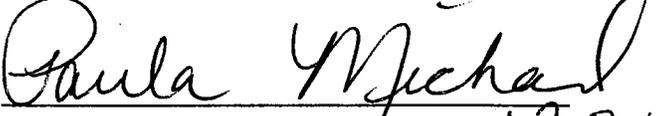
David Allen
(Printed name)

48-5257 KUKUIHAELE RD.
(Address) (Phone) 96727


(Signature) 12/2/15

MARKUS BROYLES
(Printed name) 7751177

48-5536 WAIPIO RD
(Address) (Phone)


(Signature) 12-2-15

Paula Michael
(Printed name)

48-5460 KUKUIHAELE RD
(Address) (Phone) 775-1701


(Signature) 12-2-15

RON JOHNSON
(Printed name)

PO Box 1675 HONOKAA 96727
(Address) (Phone) 520 560 2243


(Signature) 12/2/15

LORI JOHNSON
(Printed name)

PO Box 1675 HONOKAA 96727
(Address) (Phone) 520 560-6530

Josh P Dec. 2, 2015
(Signature)

KOOHAN PAIK

(Printed name)

P.O. BOX 1362, HONOKAA, HI 96727
775-7758
(Address) (Phone)

Kristan Hunt 12/2/15
(Signature)

KRISTAN HUNT

(Printed name)

P.O. Box 5125
Honokaa, Hi 96727 896-8D13
(Address) (Phone)

Jaime Hunt (KH) Dec 2, 2015
(Signature)

Jaime Hunt

(Printed name)

48-5432 Kukuihaele Road
Honokaa, Hi 96727 775-7425
(Address) (Phone)

Deva Hunt (KH) Dec 2, 2015
(Signature)

Deva Hunt

(Printed name)

P.O. Box 5125
Honokaa, Hi 96727 775-7466
(Address) (Phone)

Michael Gray
(Signature)

MICHAEL Gray
(Printed name)

Dec 2, 2015

48-5370 Kukuihaele Rd
Honokaa
342-0596
(Address) (Phone)

Mary Gray
(Signature)

Mary Gray
(Printed name)

Dec 2, 2015

48-5370 Kukuihaele Rd
Honokaa
255-9118
(Address) (Phone)

Elizabeth Y. Millare Dec. 2, 2015
(Signature)

Elizabeth Y. Millare
(Printed name)

48-5271 Kukuihaele Rd
(Address) (Phone)

Larry Villak
(Signature)

LARRY VILLAK 12-2-15
(Printed name)

P.O. Box 2022 Honokaa, Hawaii 96727
775-1814
(Address) (Phone)

Colleen Gold 12-2-15

(Signature)

Colleen Gold

(Printed name)

P.O. Box 2022 775-1814

(Address)

(Phone)

Honolulu, HI 96727

Gayle Magness

(Signature)

Gayle Magness

(Printed name)

12-3-15

48-5300 Kukuiaele Rd

(Address)

(Phone)

Honolulu HI 96727 775-1304

Barney Esquea

(Signature)

Barney Esquea

(Printed name)

P.O. Box 2027 443-8962

(Address)

(Phone)

(Signature)

(Printed name)

(Address)

(Phone)

Lawrence Fujitoka Jr 12/2/15

(Signature)

LAURENCE FUJITOKA JR.

(Printed name)

P.O. Box 5107 HONOLULU 775-0654

(Address)

(Phone)

Be Uehara

(Signature)

Bruce Wilkes

(Printed name)

48526 WAIKLO RD 96727

(Address)

Honolulu HI

(Phone)

(Signature)

(Printed name)

(Address)

(Phone)

(Signature)

(Printed name)

(Address)

(Phone)

COMMENT FORM to be filled out and mailed to addresses below.

From: Colleen A. Lawrence
(Name)

Date: Dec 4, 2015

48-336 Lo'ihī Rd. Kūkuihaele HI 96727
(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

Yoga at dawn, amateur astronomy - late at night, croquet, bicycling, soccer, basketball

2) What parts of the proposed plan do you like?

I like the restrooms - although located by the large grass where residents gather, wheelchair access, a pavillion for rain, where we gather

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

Keep park green, relocate pavillion, NO fencing, replace ball park to allow multiple sports activities, encourage fitness. Keep park available for multi use activities and simple. Send some of the funding to improve Waipi'o lookout facility + Rice acquired property!

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

Keep Kūkuihaele Road the ancient King's trail it is - NO expanding road or turn lanes. The Honokaa-Waipio bypass road was constructed to protect our village simple life. Mahalo

IMPORTANT: DEADLINE TO SUBMIT IS **DECEMBER 8, 2015** POSTMARK

RECEIVED

December 6, 2015

Concerning Kukuihaele Park Improvements

2015 DEC -9 PM 12:43

Mr. Ron Terry
Geometrician Associates LLC
P.O. box 396
Hilo, Hi. 96721

DEPT OF PARKS & RECREATION
COUNTY OF HAWAII

cc:James Komota
Dept of Parks and Recreation-County of Hawaii
101 Pauahi St., Suite 6
Hilo, Hawaii 96720

Aloha,

I understand you have done much planning. There are many concerns about the park improvements and transparency. The manner in which the meetings were conducted created confusion among neighbors and false information pertaining to gathering plans for study. The comment time for deadlines were very short and my village community is shocked by the plans we found, that we were told were unavailable.

I am a 40 year resident and land owner where Mudd Lane meets Kukuihaele Road. This is a historic village and Kukuihaele Road, where the Kings trail IS, has mana. The rocks and aina are precious to residents who have loved the park and simple road for decades + .We put up with the noise of building the by pass road, over 25 years ago, to the lookout to save our unique beauty and heritage.

The EA study is wrong in many ways. Three hours here and you came to totally wrong conclusions in your study. Residents are upset. WE are tax payers and do not want our funds wasted on a baseball field. I expressed NO to a ball park at the NHERC meeting.

WE have 24 children in this community, of different ages. They and their families all use the park at different times in various ways. I, for instance, ride my bike to practice yoga at dawn Sundays weather permitting. I use the park to star gaze late at night when meteorite showers occur and planetary alignments sparkle in the heavens. I have a basket ball and enjoy shooting hoops. It is a social place to sing and gather for music. And the families enjoy parties that require large open spaces. No fences should lock us out of our beloved park!

The reality is we have no space available for your baseball field. Kukuihaele Road will not be able to handle more traffic and be the cherished trail of centuries that neighbors love and live here for. Mudd lane is unique with a blind hill that we can maneuver. I will not support destroying the ambiance of this village for Hilo's Ball Park. We have multi sports and other uses for the park, that are already important to families here. The ball park is too limited.

Now, Waipio Lookout does need parking, upgraded handicap bathrooms ect. and has a road built for the traffic.

I heard Ted, and 82 year old taro farmer I have known since my beginnings here, express his concerns about his final party. He can play a mean ukulele and wants the park for his grandchildren to ride bikes and roll in green grass. He is a community treasure and was incredibly upset about these plans. So was his brother Rudy.

We are a simple small village and we like it! My clients feel the peace and healing Kukuihaele emits instantly. Hawaiian study groups speak of Kukuihaele as where the healers of old lived and still live today. Come and really immerse yourself in our humble village and begin to understand who we are. Then you will see what a mistake this plan is. Please hear the voices of the people who invested our lives and families in the village we love. Kukuihaele park is our open space we enjoy now.

Please put your flawed plans aside and let the residents be heard.

Thank you for your time.

Aloha,

Colleen A Lawrence

Colleen A Lawrence 12/06/15

Kukuihaele Neighborhood Association
Interim President

geometrician

A S S O C I A T E S , L L C

integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Colleen A. Lawrence
PO Box 5078
Kukuihaele HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Lawrence:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 2 letter, requesting an extension of the comment period, and the letters of December 4 and December 6, 2015, providing comments. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

The County was not able to extend the comment period, but late comments posted within a few days after the comment period ended were considered and included at the County's discretion. Other than a few comments received about a month after the comment period, which reiterated the points made in earlier comments, as well as a petition to support the ballfield, there were no other late comments. Please note that the 30-day comment period applies only to the Draft EA. The County continues to welcome dialogue on the project outside of the particular context of the EA.

In response to the points raised in your December 4 letter:

1. *Activities you engage in and support.* Thank you for sharing your activities and your support for the pavilion and restroom.

2. *No baseball field or fence, and keep basketball court as is.* Please see the responses below concerning the baseball field and fences. Please see the attached letter for information about slight relocation of the basketball court. Many residents have expressed a desire to see it improved.

In response to the points raised in your December 6 letter:

1. *Residents do not want a baseball field, and would instead prefer it for other activities such as yoga, stargazing, basketball and gatherings.* We respectfully offer that the plans for restoring the ballfield at Kukuihaele – the entire reason that this section of the park was created in the 1950s – have received

much support, as well as some opposition. P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. All the activities that you value can continue to occur, and basketball will be improved. The project does not have to be a zero-sum game, in which those community members who attain the facilities they have long asked for "win", while those who want other facilities "lose." The park is just one point in a continuing dialogue with the community that can help bring a variety of facilities in various places that satisfy the diverse needs of a changing community.

County parks are part of a system. Although a park in a particular area may serve primarily that specific community's residents, each park in our County is meant for all its citizens as well as the visitors with whom we share our island. Just as Kukuihaele residents are able to enjoy facilities at parks in Honokaa, Waimea, Hilo, Hapuna and other parts of the island, other island residents should be able to enjoy Kukuihaele's facilities. Having facilities that are open to and mindful of the needs of all County users allows our citizenry to leverage the value of our parks.

P&R will attempt to accommodate large gatherings through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park.

2. *Chain link fence.* The Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-foot high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

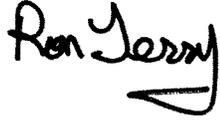
3. *Traffic.* There are neighborhood parks in communities throughout the island of Hawai'i with the same modest level of facilities as those being proposed, and P&R is unaware of any major traffic issues. Large events such as parties sometimes draw a number of vehicles, but this already occurs at Kukuihaele Park. In fact, your letter states concern about such events being limited by restoring the

ballfield to ballfield uses. However, P&R understands the concerns about increasing traffic. The County intends to monitor this situation. If justified, mitigation can be implemented through a reasonable combination of legislative action (e.g., lowering speed limit), roadway improvements (e.g., repaving, shoulder improvements, additional signage, speed humps, etc.) as appropriate and allowable by working through DPW, and enhanced enforcement through the Police Department.

4. *Waipi'o Lookout*. It is also expected that solutions to the restroom situation at the Waipi'o Valley Lookout will be developed in the near future, reducing this as even a minor area of concern.

Again, we very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090; for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. The "R" is large and loops back under the "o". The "T" is also large and loops back under the "y".

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

**Kukuihaele Neighborhood Association
P.O. Box 5078
Kukuihaele, HI 96727**

December 4, 2015

Clayton Honma, Director
County of Hawaii
Dept. of Parks and Recreation
101 Pauahi Street, Suite 6
Hilo, HI 96720

Re: Kukuihaele Park Improvements Project, TMK (3rd) 4-8-006:010, Hamakua District

Dear Director Honma,

Please see enclosed two resolutions, both of which passed unanimously at the Kukuihaele Neighborhood Association meeting that took place on December 3, 2015.

We have recently learned that a date had been set to bid for the demolition and construction of our park in Kukuihaele **before** the comments period of the Draft EA had ended. Because this is in violation of due process and Chapter 343 of the Hawaii Revised Statutes, one of the enclosed resolutions demands that bidding and construction be postponed until the Draft EA results in a definitive FONSI or EIS.

Most people in the community are still unaware that the current park is set to be demolished and replaced with a baseball park. This is in violation of the spirit of Chapter 343, HRS, which exists to ensure an informed and participatory public. For this reason, the other enclosed resolution requests a 45-day extension to our comments period ending December 8, 2015. This extension is needed for us to notify all members of our community that a Draft EA exists for their examination and that they would be able to comment.

The faction in our community becoming increasingly aware of this park "improvements" project is extremely upset over the development and is prepared to take legal action, if necessary, to ensure that the County abide by Hawaii State law.

If there are any questions, please call me at 775-9130.

Sincerely,



Colleen Lawrence, Interim President
Kukuihaele Neighborhood Association

Enclosures: "Resolution to demand postponement of the bidding process and construction..."
"Resolution to request a 45-day extension to the comments period..."

**RESOLUTION TO REQUEST FROM THE COUNTY OF HAWAII
A 45-DAY EXTENSION TO THE COMMENTS PERIOD (BEGINNING DECEMBER 9, 2015) FOR
THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
THE KUKUIHAELE PARK IMPROVEMENTS PROJECT, TMK (3RD) 4-8-006:010, HAMAKUA DISTRICT**

WHEREAS, the County of Hawaii, Department of Parks and Recreation, has prepared the Draft Environmental Assessment (EA) for Kukuihaele Park Improvements project; and

WHEREAS, the Draft EA is being conducted in accordance with Chapter 343 of the Hawaii Revised Statutes, along with Title 11, Chapter 200 of the Hawaii Administrative Rules, which are laws that form the basis for the environmental impact process in the State of Hawaii; and

HONORING that the purpose of the environmental impact process is to inform both administration and the public of environmental, socio-economic and cultural impacts of a project on a community; and

UNDERSCORING that an essential component of the environmental impact process is to ensure community participation and input, with the goal of creating the best possible future for the community; and

ALARMED that the community of Kukuihaele was almost entirely unaware that a Draft EA had been prepared for the Kukuihaele Park Improvements project until only a few days before the comments deadline of December 8, 2015; and

ACKNOWLEDGING that the Kukuihaele community strongly desires to take part in the environmental impact process to determine the best possible future of Kukuihaele Park and Kukuihaele community; and

NOTING that, due to exigencies of the holiday season, such as family obligations and off-island travel, residents need an extra full 45 days to sufficiently study the Draft EA and compile adequate comments; now, therefore,

BE IT RESOLVED BY THE KUKUIHAELE NEIGHBORHOOD ASSOCIATION that the Association requests from the County of Hawaii a 45-day extension beginning December 9, 2015, to the comments period ending December 8, 2015, for the Draft Environmental Assessment for the Kukuihaele Park Improvements Project, TMK (3RD) 4-8-006:010, Hamakua District.

BE IT FINALLY RESOLVED that the Kukuihaele Neighborhood Association shall forward copies of this resolution to Geometrician Associates, all members of the Hawaii County Council, the Honorable Mayor William P. Kenoi, the Honorable Governor David Ige, the Honorable State Representative Mark Nakashima, the Honorable U.S. Representative Tulsi Gabbard, the Honorable U.S. Senator Brian Schatz and the Honorable U.S. Senator Mazie Hirono.

Dated at Kukuihaele, Hawaii, this 3rd day of December, 2015.



Colleen Lawrence
Interim President
KUKUIHAELE NEIGHBORHOOD ASSOCIATION

PASSED UNANIMOUSLY - December 3, 2015
Kukuihaele Neighborhood Association emergency meeting

RESOLUTION TO DEMAND POSTPONEMENT OF THE BIDDING PROCESS AND CONSTRUCTION FOR THE KUKUIHAELE PARK IMPROVEMENTS PROJECT UNTIL AFTER EITHER A "FINDING OF NO SIGNIFICANT IMPACT" (FONSI) IS ISSUED OR AN ENVIRONMENTAL IMPACT STATEMENT HAS BEEN COMPLETED

WHEREAS, the County of Hawaii and the community of Kukuihaele, in the ahupuaa of Kanahonua in the County of Hawaii, are currently engaged in the Environmental Assessment (EA) process for the Kukuihaele Park Improvements project, TMK (3rd) 4-8-006:010, Hamakua District; and

WHEREAS, the EA is being conducted in accordance with the Hawaii Environmental Policy Act (HEPA), as codified in Chapter 343 of the Hawaii Revised Statutes; and

NOTING that, as set forth in HEPA, the EA is a decision-making document prepared for the purpose of reaching one of two final determinations on the project, which would be either 1) the completion of an Environmental Impact Statement (EIS) or 2) the issuance of a Finding Of No Significant Impact (FONSI); and

HONORING that an essential component of the EA process is to ensure community participation and input, with the goal of creating the best possible future for the community, and without such participation, no final determination can be effectively reached, which is why the Draft EA for the Kukuihaele Park Improvements project includes a comments period ending December 8, 2015; and

EMPHASIZING that any decision to move forward with construction, including the bidding process, must *not* be considered until well *after* the December 8, 2015 close of the comments period which would determine whether a FONSI or an EIS was to be issued; and

CONCERNED that, prior to the December 8, 2015 close of the comments period, the County of Hawaii announced on November 21, 2015 a prebid meeting to be held on November 30, 2015 and a construction-bid date of December 23, 2015, for the Kukuihaele Park Improvements project; and

RECALLING that, until either the completion of an EIS or the issuance of a FONSI, any planning for project construction, including bidding, is a violation of due process and of the Hawaii Environmental Policy Act (HEPA), as codified in Chapter 343 of the Hawaii Revised Statutes; and

WHEREAS, on December 2, 2015, the Hawaii Supreme Court reinforced the importance of due process by rescinding the permit to build the Thirty Meter Telescope because the Department of Land and Natural Resources failed to follow due process when it prematurely issued the permit prior to the close of a contested case hearing; now, therefore,

BE IT RESOLVED BY THE KUKUIHAELE NEIGHBORHOOD ASSOCIATION that the Association demands the postponement of the bidding process and construction for the Kukuihaele Park Improvements project until after either a FONSI is issued or an Environmental Impact Statement has been completed.

BE IT FINALLY RESOLVED that the Kukuihaele Neighborhood Association shall forward copies of this resolution to Hawaii County Dept. of Public Works Director Warren H.W. Lee, Geometrician Associates, all members of the Hawaii County Council, the Honorable Mayor William P. Kenoi, the Honorable Governor David Ige, the Honorable State Representative Mark Nakashima, the Honorable U.S. Representative Tulsi Gabbard, the Honorable U.S. Senator Brian Schatz and the Honorable U.S. Senator Mazie Hirono.

Dated at Kukuihaele, Hawaii, this 3rd day of December, 2015.


Colleen Lawrence
Interim President
KUKUIHAELE NEIGHBORHOOD ASSOCIATION

PASSED UNANIMOUSLY - December 3, 2015
Kukuihaele Neighborhood Association emergency meeting

RECEIVED

KUKUIHAELE NEIGHBORHOOD ASSOCIATION

P.O. Box 5078

Kukuihaele, HI 96727

2015 DEC 7 HI 12:13

PAID 0.00
COUNTY OF HAWAII

COMMENTS TO DRAFT ENVIRONMENTAL ASSESSMENT

for

KUKUIHAELE PARK IMPROVEMENTS PROJECT

December 6, 2015

PART I, Section 1.1:

Every weekend and many weekdays after work, there are kids and adults playing ball or frisbee at Kukuihaele Park. They use the basketball court on the higher level and on the lower level. Many different sports are played, including soccer, frisbee, jogging, and football. The lower level is also used for yoga classes.

The Draft EA's claim that there is a lack of needed recreational facilities is highly overstated. As described above, the park already enables many different segments of the community to recreate. Just because the activities are not institutionalized (such as Little League or a varsity sport) does not make them any less worthy. The open green lawn as it is gives the park the versatility to satisfy and serve the majority of members our community. If a regulation Little League field were installed at the park, its massive "footprint" would fill the entirety of the lower level of the grounds, edging out people who frequent the park on a daily basis to enjoy other types of recreation.

Only a tiny percentage of our community is aware of how huge the baseball field really is, since very few have seen the plan or the Draft EA. Those who have seen the plan are appalled. Virtually every community member who has seen the plan opposes it. Those who were initially in favor of "improvements" reversed their support upon seeing the proposed plan.

One way to mitigate this disruption to community members who presently recreate in the park is to delete the regulation Little League field from the proposed plan, while keeping the restrooms. That way, people could continue enjoying a diversity of recreational activities. Such an adjustment would create a park that is appreciated by the greatest number of people in the community.

Members and the Board of the Kukuihaele Neighborhood Association (hereafter referred to as "KNA" or "the Association") oppose the development of a regulation Little League ball park, but are in favor of the restrooms and ADA compliance.

Part 1, Section 1.1 cites the popular 1978 campaign for tennis courts as proof that the proposed Little League field is needed. It also cites the playground equipment installed in 1990 as further "proof." However, this is false logic, because neither tennis courts nor playground equipment are equivalent, size-wise, to a large ball field. Neither is institutional. Tennis courts would not monopolize the limited real estate available at the park in the way that a Little League field would, thus edging out other activities. Playground equipment, as well, take up significantly less space than a Little League field. Real proof of the need for a Little League field must go further

than these irrelevant examples.

When **Part 1, Section 1.1**, paragraph 2 describes the “critical facilities” that Kukuihaele Park lacks, it includes a regulation Little League ball field. This is an overstatement. While enjoyment of the park is curtailed without restrooms and ADA compliance (which *are* “critical facilities”), enjoyment is definitely not curtailed by the absence of a regulation Little League ball field. In fact, for an overwhelming majority of the community, the very existence of a regulation ball field would drastically curtail enjoyment, by precipitously reducing the versatility of recreational uses that could be enjoyed by the community as a whole.

Part I, Section 1.1

The Draft EA states that “residents have repeatedly expressed to their elected representatives and P&R the desire to have better facilities along with the socio economic benefits that accrue from recreational activities.” What sort of socio economic benefits are meant by this statement? No other text in the Draft EA gives examples or elaborates on these socio economic benefits.

The Draft EA cites the nonexistence of a regulation Little League field “within almost 10 miles” as justification for the need for one at Kukuihaele Park. This is flawed logic. If one were to apply this logic to other amenities, one could say that Kukuihaele also needs a movie house, a grocery store and a barber shop, because the nearest ones are “within almost 10 miles,” in Honokaa. Clearly, the logic does not hold.

It should be noted, however, that during the sugar era, Kukuihaele did have a movie house, a barber shop, several stores, and a school with baseball field. It shows how much social and economic structures have changed since the sugar days, when the communities were much more self-contained. Today, it is routine for residents to travel to Waikoloa, Kona or Hilo between 3 to 5 days a week. Given that, Honokaa is practically a daily trip, since that’s where Kukuihaele residents go for all shopping, for school, for the library, the bank, and for full post-office services. Most people work even further away than Honokaa. In other words, it is not a big deal for Kukuihaele residents to travel to Honokaa for a sports event if that’s where the nearest regulation Little League field is located. A distance of less than ten miles, therefore, is not an issue. But the point is actually moot, since the middle and high schools are located in Honokaa, and the kids are already there. It’s perfectly convenient for them to play after school at one of the several regulation Little League ball fields already in Honokaa town. This illustrates how vastly different social and economic structures are now than from during the sugar days, when the school was where Kukuihaele Park is today. In fact, that is precisely why the first ball park was built there in the first place -- *because that's where the school was*. But now the kids are at school in Honokaa -- not Kukuihaele -- near the ball fields that are already built in Honokaa. Given this reality, the genuine need for a regulation Little League ball field in Kukuihaele is nonexistent. Yet, a prominent underlying assumption in the EA’s justification for building the regulation ball field is the assumption that Kukuihaele remains the same, self-contained village that it was during the plantation days. The EA is severely flawed because it fails to acknowledge that 21st-century Kukuihaele is very different from 20th-century Kukuihaele.

On page 27 of the Draft EA, it states that “land within the park was formerly part of a traditional landscape that was heavily utilized for cultivation.” What is the source of this information? If lands within the park were indeed used for traditional farming, it would be culturally appropriate to revitalize and adapt these agricultural traditions for a 21st-century

context. In addition to being culturally appropriate, such an alternative use for the park would conform to all three themes that express the basic purpose of the Hawaii State Plan, as put forth in **Part 3, Section 3.6.1** of the Draft EA. Those three themes are "individual and family self-sufficiency, social and economic mobility and community or social well-being." The Draft EA claims that a ball park satisfies the third theme of community or social well-being. This is absolutely false. The big ball park will displace other forms of recreation and large celebrations, severely curtailing the community's enjoyment of the park. How does the County plan to mitigate for the elimination of an affordable, world-class wedding and celebration venue? Considering all impacts, the net effect of the proposed ball park will be a severe blow to community and social well-being.

Another 21st-century context that must be considered is projected real-estate trends in the area. During the sugar days, wide open spaces were the dominant landscape. Now that the sugar industry is gone, those open spaces will continue to shrink as housing densifies throughout the area. For example, Kauai's north shore in the 1980s was very reminiscent of the Hamakua coast today -- mostly open spaces on former sugar fields. Today, that same agricultural land is crowded with new homes on CPR'd lots. On Kauai, open spaces that are accessible to the public are now few and far between. Fences are everywhere. In the foreseeable future, housing density on the Hamakua coast will likewise increase. When that happens, many people will long for the open simplicity of Kukuihaele Park as it is today. We should think about what our children and grandchildren would want *in the context of their century*, not ours.

All the landscaping that is in place now was planted voluntarily by residents. This is an indication of a certain degree of pride that certain residents take in the park *as it is*. The EA proposes to remove much of that landscaping. It would be presumptuous to think that the residents who have already invested time and money in landscaping would want it ripped out. Therefore, it would be inaccurate to depict the community as wholeheartedly in favor of the proposed ball field. To the contrary, the community would suffer if the ball park were constructed.

Finally, there is the issue of maintenance costs. The County has allotted a \$5,000 per year for maintenance after the construction of the proposed plan. The Association feels that \$5,000 would not be a sufficient sum to cover projected costs of maintenance per year. Please provide projections on cost of maintaining, cleaning and supplying a restroom facility, maintaining water and electrical, security, managing dust and noise, and landscaping of the proposed project for a one-year period. Please include breakdown of costs.

Members and the Board of the Kukuihaele Neighborhood Association oppose the development of a regulation Little League ball park, as well as chain link fence.

Increased herbicide use. There is another faction of residents who are concerned about the detrimental health effects of herbicide spraying. The group has already discussed the possibility of making arrangements with the County to stop spraying. What are the projections for volume of herbicide use for the proposed park? What is the volume of herbicide use currently? How would you mitigate for the difference?

Loss of an exquisite celebration venue. Kukuihaele Park is not just any park; its commanding view of the ocean and Waipio Valley is a setting worthy of the most sumptuous of celebrations. This is why people from all economic backgrounds choose to have their wedding parties and baby luaus at the park. The view is more magnificent than any offered by the island's most

expensive hotels, and yet it is affordable by all. Put a regulation Little League ball field there, and you take away a luxury that will no longer be affordable for working class people who wish to celebrate important milestones in their lives. Not many people would choose to get married in a baseball diamond surrounded by a chain link fence. But even if someone wanted to get married on a pitcher's mound, they couldn't, because it would interfere with ball park upkeep and because the proposed chain link fence which would prohibit access for vehicles loading tents, tables and other supplies in and out of the park. Party size would be limited to the restricted capacity of the pavilion and the 27-stall parking lot. No more big celebrations. People who are not fabulously wealthy will lose a precious community asset. How can one mitigate for that loss?

PART 2 ALTERNATIVES

The Draft EA does not provide any desirable alternatives to the proposed plan. As it stands, the only two alternatives provided are the "No Action Alternative" and the "Alternative Locations." Neither of these alternatives are acceptable because each omits what nearly every resident really wants: restrooms and ADA compliance. The only option that includes restrooms is the proposed ball park, which most residents do NOT want.

By offering no desirable alternatives, an illusion is contrived that the only option is the proposed plan.

Other alternatives need to be offered (and solicited from the community) that examine various scaled-back versions of the currently proposed plan. Until realistic and desirable alternatives that meet community needs are provided, the **PART 2 ALTERNATIVES** section of the Draft EA remains woefully incomplete.

PART 3, Section 3.1 says "Given the need for improved sports and gathering space facilities in the area, the County has determined that it is sensible to improve the park." Many in our community agree with the Draft EA that there is a need for gathering facilities. However, most residents view the regulation Little League ball field not as an improvement, but rather, as a downgrade.

Members and the Board of the Kukuihaele Neighborhood Association oppose the development of a regulation Little League ball park.

PART 3, Section 3.1.2 gives no data on current carrying capacity for rainfall water in regards to drainage. What is current carrying capacity versus carrying capacity of the site once the project is completed? What is the difference in carrying capacity for those two scenarios? How will this difference be mitigated to avoid drainage problems?

In the proposed plan, it is unclear what the distance is from the drainage area beside the basketball court to the property border. Considering that the drainage area will be on a steep grade, and that water percolates both horizontally as well as vertically, will the proposed drainage area be placed an adequate distance from the property border? What is the formula of slope grade to volume of water, for that particular type of soil, that determines the correct distance?

PART 3, Section 3.1.4 Air Quality, Noise and Scenic Resources

Noise. Can you make projections of what the sound levels in decibels will be at properties/homes

adjacent to the park during construction of the facility as proposed? The EA generalizes that "construction will likely include compressors, vehicles and equipment engine operations, the specifics of which are dependent upon means and methods utilized by the contractor." Please describe what noise will be produced as it relates specifically to construction of this particular project. Please explain how projections data is collected. What measures will be taken to mitigate for the increased noise?

Can you make projections of what the sound levels in decibels will be at properties/homes adjacent to the proposed ball field during ball games? Please describe how projections data is collected. What measures, such as installation of permanent structures, will be taken to mitigate for the increased noise?

Dust and exhaust. Can you make projections as to the amount of dust and exhaust generated from construction? How long will it last? What will impact be on homes adjacent to park? What would conditions be like during drought? What would conditions be like with trade winds? What direction would it blow during various times of year and varied times of day? Please explain how projections data is collected. How will this increase in dust and exhaust be mitigated? The Draft EA states that "the contractor will be directed to keep the area free of dust and to conduct all work in conformance with Chapter HAR 11-60.1." How will the contractor's conformance with this law be enforced?

The Draft EA states "Although baseball fields generate some dust during and between uses, it is generally not in significant enough amounts to require mitigation, such as field watering, although this can be undertaken if necessary."

The statement above uses the word "generally" to indicate a situation of general conditions. However, the site at Kukuihaele Park is unusual in that it is affected by nearly constant winds coming off the ocean. To illustrate, there is a gravel road that runs along the south border of the park. During the drought, brown clouds of dust blow off the road and across the park even when no one is driving on the road, but especially when a vehicle passes over the road. When more gravel is applied, the problem is greatly mitigated. The placement of the proposed ball field is directly upwind of several homes. Given the endemic windiness of this site, what are projections as to the amount of dust generated from the baseball field on days of varying windiness when there is no ball game in session? What are projections as to the amount of dust generated from the baseball field on days of varying windiness during ball games? How will increased dust in each scenario (during games and between games) be effectively mitigated when winds are frequent and so highly unpredictable?

Light nuisance. Though the proposed plan has not drawn lighting fixtures into the drawing, it is regulation to light parking lots and other facilities. Ball parks also are equipped with floodlights. How many of these lights will there be? Where will they be placed? How many of the lights will be illuminated every night, all night? What are the projected impacts of lighting on adjacent homes during night games and nights with no games? How will these impacts be mitigated?

Section 3.1.5 Hazardous Substances, Toxic Waste and Hazardous Conditions

Because the proposed project would necessarily require more maintenance than simply running a riding mower over an expanse of lawn, the use of herbicides is likely being considered as the solution to increased maintenance. However, those of us residents who want to eliminate the current use of herbicides would object to an increase in their use. How would the County avoid

any increase in herbicide use, and even better yet, how could all herbicide use be eliminated with the proposed plan?

Section 3.2.1 Socioeconomic Characteristics

The EA states that "many surrounding residents who have been part of the Kukuihaele community for over five decades took the view that improving the park would return it to its former central place in the social life of the community." The Draft EA cites only those old-timer residents who are in favor of the proposed plan, while omitting those who are opposed. There are many old-timers opposed to the proposed plan, such as 82-year-old Theodore Angelo. Mr. Angelo, who was born and raised in Kukuihaele, spoke scornfully at an Association meeting of how the plan would fence the community out of its own park. He cited a similar situation in Haina, where children there spoke to him about how they were locked out of their own park and forced to play in the street whenever the senior softball team had reserved the park for games. Mr. Angelo is adamantly opposed to the Park Improvements proposal. His brother, Rudy Angelo, is in agreement with his brother. The omission from of residents opposed to the project is an unethical bias in favor of ball-park development and a severe flaw in the Draft EA.

Security. The EA mentions the potential of the park "to attract loiterers, drug users, and homeless or others who may illegally camp." This is one of many examples of the many differences between Kukuihaele today versus in the last century. Loiterers were not a problem then. But how do we really know they would be a problem now? What projections have been/can be done to make that claim? And if credible projections reveal that the claim is viable, is a fence the only solution to dealing with loiterers? If so, then the proposed plan works at cross purposes. A chain link fence, like that proposed in the plan, could be so psychologically alienating that it could likely prevent the park from ever achieving the stated goal of being a "central place in the social life of the community." A chain link fence is not welcoming, unless you like the "concentration-camp look."

If reliable projections confirm that loiterers would be a problem, what mitigative measures will be taken other than a chain link fence?

Traffic. Page 29 of the Draft EA describes current traffic frequency from a series of observation periods made up of three one-hour, non-peak periods of traffic observation. Traffic amounted to levels of less than one vehicle per minute. Have projections been conducted of how traffic flow will increase? How many more cars would the Kukuihaele Park improvements, as proposed, generate?

Page 30 of the Draft EA states that "The improvements would cause traffic to increase," and also rationalizes this increase in traffic by stating that such "adverse effects should be considered in the context of a park that from the 1930s through the 1980s had much higher levels of use." However, during that era of higher use, a young boy from the Oshiro family was struck by a vehicle on Kukuihaele Road and was killed. Not everything was better "in the old days." Today, there are many children playing in their front yards, especially in the area known as Tiger Camp. Given this fact, increased traffic is a very real concern. Is this a project everyone really wants? And if the project is implemented, can large speed bumps be installed the length of Kukuihaele Road to mitigate increased traffic? (They must be large, since speed demons have perfected a technique in going so fast that they practically fly over the small speed bumps, with no damage to shock absorbers.)

If we consider that the reason the Kukuihaele Neighborhood Association lobbied for and succeeded in building the bypass road mauka as a way to permanently detour traffic out of Kukuihaele, it would follow that there would be a faction of the community who would object to the increase in traffic generated by a ball park with regular Little League games. Given that, a viable alternative would be to secure a ball park location on the mauka highway, where the impacts of increased traffic would be far less significant.

Overflow parking. Another difference between today and the last century was the parking issue. Formerly, community members could walk to ball games. Today, this is not the case. Will 27 parking spaces be enough? What are the projections on how many parked cars a Little League game and/or practice would generate? If it is over 27 (the number of allotted spaces for cars) how many cars over 27 would that be? Where will those cars park? Will the road have to be widened in order to accommodate overflow parking? What if road-widening violates cultural concerns, as described in the next section of this report? What alternatives are there?

Property values. Yet another difference between today and the last century is the economic landscape of real estate. During the plantation days, this was not an issue, because the plantation owned all the worker housing. Today, this is a very real issue, where home ownership is the only path to real security for working-class people. It is extremely important to be aware of impact to property values.

Given the projected increase in traffic; the proposed chain link fence, bleachers, huge ball field, and dug-out; increased dust; increased noise levels; and the possible widening of the road -- what are the projections on how the proposed project will impact property values of homes directly adjacent to the park, a quarter-mile from the park, a half-mile from the park, and one mile from the park?

Section 3.2.2 Cultural Resources

The EA fails to point out the likely significance of Kukuihaele Road in terms of Hawaiian pre-contact history. It is crucial to recognize its significance so as to avoid possible secondary impacts resulting from the proposed park improvements project.

One can deduce from the writings of 19th century Hawaiian historian Samuel Manaiakalani Kamakau that what we now call "Kukuihaele Road" was part of the same footpath used for centuries by the Ali'i of Waipio Valley. In an excerpt below from "The Story of 'Umi," first published in 1870 in Kamakau's "Ke Au 'Oko'a," we see that the footpath led from King Liloa's compound in Waipio Valley south to the Kealakaha stream and heiau. Liloa was a high chief in the 15th and 16th centuries who unified the island of Hawaii, and father to 'Umi-a-Liloa, who rose to rule the island of Hawaii around 1525, as mentioned on page 21 of the Draft EA. As the excerpt seems to indicate, the street that is now Kukuihaele Road was likely part of a very sacred thoroughfare, kapu to all but the king and his entourage:

"At one time Liloa desired to build several heiaus in Hamakua from Kukuihaele to Kowana'e and the vicinity about Kealakaha. When a house for the god was completed, Liloa, the kahunas, the favorite god, Ku-ka'ili-moku, the chiefs, and servants went up from Waipi'o to the pork-eating feast for the dedication of the chief's heiau. The procession was made a tabu one, from Kukuihaele to Wai-ko'eko'e and on to Kapulena, Kawela, and Pa'auhau."

Kukuihaele Road is likely the only segment of the Ali'i Footpath that has not been widened into a highway. Because of this, it could be viewed as a *wahi pana* of the highest order. We must take special care to not create a situation in which people might want to desecrate the road by widening it. Yet p. 29 of the Draft EA cites a 10-foot-wide setback at TMK 4-8-006:010 for eventual widening. Before this is considered, we need confirmation that Kukuihaele Road is indeed part of the Alii Footpath. If we do not take special care, this development could be viewed as yet another instance of *hewa* against sacred land. If it is confirmed to be part of the historical footpath, can we be absolutely certain that a ball field will not generate the level of traffic that would require widening Kukuihaele Road? Page 30 of the Draft EA states that "The improvements would cause traffic to increase." If this is true to the degree that the road must eventually be widened, we need to re-evaluate how we proceed with park improvements, otherwise we may find ourselves desecrating a sacred cultural resource. In conformance with "Section 6.2 GOALS" of the General Plan, an evaluation of the Alii Footpath must be conducted to ensure there are no adverse effects to a significant historical site by widening the 10-foot-wide setback.

Page 30 of the Draft EA, under *Impacts and Mitigation Measures*, states that "The project as proposed does not insert any improvements that would conflict with the 10-foot wide road widening setback on Kukuihaele Road." This statement is off-point, since the cultural and historical significance of Kukuihaele Road itself (rather than any park improvements) may conflict with the 10-foot wide road widening setback.

Existing Cultural Resources, Consultation, Impacts and Mitigation Measures

The Draft EA cites the names of only community residents supportive of the park improvements as proposed, while those who did not support the proposed improvements wished to remain anonymous. Why is that? We can deduce that, somehow, those who did not support the improvements did not feel safe to speak out. It would seem that many, but not all, who oppose the proposed improvements fear retribution from supporters of the project. This level of tension, fear and conflict cannot produce a satisfactory result for the community, especially when the powers-that-be seem to be pushing the project through just to meet time deadlines, at the expense of community well-being. This is one of the reasons that the Association has submitted a resolution for a 45-day extension to the comments period: in order to create an open, transparent democratic process that previously had not existed in this project's development.

Page 22 of the Draft EA claims that "Section 7.2 GOALS - NATURAL BEAUTY" of the General Plan is not violated. To the contrary, most of our residents feel that the permanent installations of a chain link fence, bleachers, and dug-out would greatly mar the rare open-space, scenic beauty of the park. In other words, the proposed plan is a significant violation of Section 7.2. (GOALS - NATURAL BEAUTY) of the General Plan.

PART 4: DETERMINATION of the Draft EA states that the Hawaii County of Parks and Recreation expects to determine that the proposed project will not significantly alter the environment. By contrast, the Kukuihaele Neighborhood Association believes this to be a severely flawed expectation, based on reasons given above, as well as reasons that follow:

PART 5: FINDINGS AND REASONS

In this section, comments are based on factors that agencies must consider when determining whether an Action has significant effects, as set forth in Chapter 11-200-12 of the Hawaii

Administrative Rules. KNA comments below follow the italicized factors that agencies must consider.

1. *The proposed project will not involve an irrevocable commitment or loss or destruction of any natural or cultural resources.*

This may or may not be true, because we must first determine the cultural significance of Kukuihaele Road. If it is judged to carry cultural significance, because it is a segment of the Alii Footpath, then the Proposed Action would likely involve possible destruction of cultural resources.

2. *The proposed project will not curtail the range of beneficial uses of the environment.* This is a highly inaccurate statement, because the Kukuihaele Park is presently cherished as a venue for baby luaus, weddings and other big celebrations. A ball park would totally eliminate the ability of anyone to hold anymore celebrations at the park. This would be an enormous negative impact on the community, worthy of canceling the ball park portion of the plan altogether.

A regulation Little League ball field would also curtail flexibility of all other recreation by monopolizing the land area. And for some people whose homes are directly adjacent to the park, the project would present the nuisances of increased noise, dust and lighting. For frequent users of the park, the proposed ball field would be an eyesore. And for people whose children play in the front yard adjacent to Kukuihaele Road, traffic dangers would rise precipitously.

3. *The proposed project will not conflict with the State's long-term environmental policies.* By curtailing flexibility of recreational use by imposing a regulation Little League baseball field on the park, as well as curtailing the use of the park for large parties, the Proposed Action is not minor. It is major. It would not expand recreational opportunities, but rather, it would exclude all the recreational activities currently enjoyed because the ball field, dug-out, bleachers and fence would monopolize the limited land space. It is thus inconsistent with most elements of the State's long-term environmental policies.

4. *The proposed project will not substantially affect the economic or social welfare of the community or State.*

The Proposed Action would harm the social welfare of a significant majority of our community who prefer the recreational flexibility that a large grassy space can offer. It would also have tremendous negative impact by wiping out large celebrations that currently take place with great success at the park.

But the greatest harm to the social welfare of the community would take place if this project is pushed through without meaningful participation by residents in the planning. So far, this has not taken place. The Draft EA is a document prepared in order to inform the public exactly what is being planned. Yet nearly all residents have been entirely unaware that the Draft EA was available, or that there was a comments period. Several began to become aware about three weeks into the 30-day comments period. Until residents are apprised of this process and their role in it, we will never have the park improvements we truly need or want as a community. If this happens, we will end up with a boondoggle that we will deeply regret.

The Proposed Action may negatively impact economic welfare by lowering property values. The project proposes to replace a breathtakingly beautiful open space with ugly concrete and chain-link fences that our community does not want. We need projections of how the

proposed project will impact real-estate values in the area.

5. The proposed project will not involve substantial secondary impacts, such as population changes or effects on public facilities.

Secondary effects could result from the Proposed Action, if traffic requires the widening of any part of the road, and the road is deemed to be a cultural asset, as part of the Alii Footpath. Increased traffic would also present heightened danger to children playing in their front yards.

6. The proposed project is not one which is individually limited but cumulatively may have considerable effect upon the environment or involves a commitment for larger actions. Again, if increased traffic flow leads to the widening of any part of the road, this could involve destruction of a cultural resource, since the Kukuihaele Road may be part of the sacred Alii Footpath. Just because so much damage has been done already to so much of the Footpath in the past is no reason to repeat this error, and more reason to rectify it.

7. The proposed project will not detrimentally affect air or water quality or ambient noise levels. What data has been collected to prove this claim? What projections for dust and for noise levels have been conducted? What was the methodology?

8. The project will not substantially affect scenic vistas and viewplanes identified in county or state plans or studies.

This is a highly inaccurate statement. The sight of chain link fence, bleachers and dug-out in this exquisite natural setting will drastically diminish the world-class, breathtakingly beautiful scenery currently present at the park. The Proposed Action will have dramatic negative impact on the beauty of the site, and will likely cause a decrease in property values of the neighborhood.

For the reasons above, the Kukuihaele Neighborhood Association asserts that the Proposed Action **would have significant effect** in the context of Chapter 343, Hawaii Revised Statutes and section 11-200-12 of the State Administrative rules. Therefore, the Kukuihaele Neighborhood Association expects the County to fulfill its obligation to conduct an Environmental Impact Statement, that includes detailed socio-economic impacts on the community by the Proposed Action. Furthermore, due to the significant number of flaws, omissions, inaccuracies and false assumptions within the Draft EA, the Association asserts that the County has no option other than to conduct an Environmental Impact Statement in order to clarify and correct the inaccuracies of the Draft EA.

FINAL REMARKS

The mission of the Kukuihaele Neighborhood Association (“the Association”) is to represent the best interests of the residents of Kukuihaele. To carry out this mission, on December 3, 2015, the Association held an emergency meeting when it became evident that the County was failing the best interests of the community.

The purpose of the emergency meeting was to discuss the Kukuihaele Park Improvements. The urgency of the meeting stemmed from apparent violations of due process. The first issue concerns actions (and inactions) that have prevented essential information from

reaching the public. While this is not a direct violation of Chapter 343 of the Hawaii Revised Statutes (HRS), it most certainly is a violation of the spirit of the law. The second issue concerns how the County is barreling forward by setting bidding dates for demolition and construction well before the close of the Draft EA comments period. This violates due process and HRS Chapter 343 (reminiscent of the recent transgression committed by the Department of Land and Natural Resources in prematurely granting the construction permit for the Thirty-Meter Telescope before the end of the contested case hearing).

Absence of Transparency

At a Kukuihaele Park Improvements presentation held on November 5, 2015, the plan was presented for the first time to the public by officials at the Department of Parks and Recreation. Several residents who attended reported that officials made it understood that the meeting was the public's only shot at submitting feedback. Residents also reported that when people asked if the plans were available online, they were told "no." This may have been technically true at the time of the meeting, but there was no reason to conceal from the public that the plans would be made available online only three days later, beginning November 8, and that there would be a 30-day period for comments. This absence of transparency is of great concern to our community, because it has kept our residents from knowing that a Draft Environmental Assessment (Draft EA) of the proposed project was actually made available and that they had the legal opportunity to participate through the comments period until December 8.

The only way to learn of the Draft EA's availability had been to read the announcement published on the Office of Environmental Quality Control (OEQC) web site. Only one member of our community learned of this, around November 16, 2015. Sadly, word of the Draft EA's availability spread slowly, so that by December 1, no more than a couple dozen citizens had become aware of the Draft EA and comments period. Information was too little, too late.

The very purpose of the OEQC newsletter announcement and the EA process is to ensure that the public is informed and has the opportunity to participate. An informed public, the foundation of democratic process, would be the minimum ethical requirement needed before putting this project out to bid. We are concerned because we have not had democratic process. This is why we have submitted a resolution, which passed unanimously at an Association meeting, to the Department of Parks and Recreation, requesting a 45-day extension to our comments period. We urge you to see the justice in granting this extension, and take action to do so.

Violation of Chapter 343, Hawaii Revised Statutes

Just as alarming as the discovery that the Draft EA and comments period was apparently concealed from us, was the discovery that a date had been set to bid on the construction of the proposed plan well before the end of the comments period. While the comments period was to end on December 8, 2015, an announcement was made on November 19, 2015 (well before the close of comments) which set the dates of November 30, 2015 for a pre-bid meeting and December 23, 2015 for the actual bidding.

It is noted that, pursuant to HRS Chapter 343, the comments period fulfills the purpose of including community participation in the belief that its inclusion will result in the best possible future for the community, and thus without it, no final determination can be credibly and effectively reached. The premature setting of the pre-bid and bid dates before the end of the comments period is a glaring violation of HRS Chapter 343.

Sadly, our community is witnessing that our park plans are not emerging out of democratic process, but rather out of bid and construction deadlines that are taking the highest precedence. These are distorted priorities that profit only a few people, none of whom are community residents. For this reason, our Association submitted a second resolution, which also passed unanimously, to the Department of Parks and Recreation, demanding a postponement of the bidding process and construction until either a Finding of No Significant Impact is issued or an Environmental Impact Statement is completed.

A Community in Crisis

Because so few of our community members have seen the plans for the proposed project, and because the few who have seen the plans are opposed to them, the County's headlong rush to unwanted construction has thrown our community into crisis.

One of the Association members, 82-year-old Theodore Angelo, who was born and raised in Kukuihaele, is an example of a resident adamantly opposed to the proposed project. Mr. Angelo spoke scornfully of how the plan would fence the community out of its own park. He cited a similar situation in Haina, where children there spoke to him about how they were forced to play in the street whenever the senior softball team had reserved the park for games.

Another member of our community who will remain anonymous to protect the rights of a minor (she is under 18), said she didn't want to have happen to Kukuihaele Park the same thing that happened to Kohala's Keokea Park, a park that had also been targeted for a development project without the community being aware. Unfortunately for the Keokea community, the park was developed and fenced, and now the locals there feel they have been locked out of their own park. The young community member said she does not want a ball park or a fence around Kukuihaele Park, and she wants her voice to be heard, even though she is a minor.

Renee Lactaon, another longtime Kukuihaele resident, said she had been in favor of the park improvements until she saw the actual drawing of the plan. Now she is also opposed to the ball park and fence. She said, "It's not 'Kukuihaele style'."

The Kukuihaele Neighborhood Association urges the Dept. of Parks and Recreation to support our quest for justice and due process. Please support our request for a 45-day extension to the Draft EA comments period, and the postponement of the bidding and construction process until a final determination on the Draft EA is reached.

Mahalo,

Colleen Lawrence
Colleen Lawrence, President

Koohan Paik
Koohan Paik, Secretary

Dallas Allen
Dallas Allen, Treasurer

geometrician

A S S O C I A T E S , L L C

integrating geographic science and planning

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March 7, 2016

Kukuihaele Neighborhood Association
Attn: Colleen A. Lawrence, Interim President
P.O. Box 5078
Kukuihaele, HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Neighborhood Association Members:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 4, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comment in the preamble to the section of your letter entitled “Comments to Draft Environmental Assessment” concerning the propriety and legality of proceeding with the bid process prior to issuing a FONSI, P&R understands the concerns, but believes that it was legal, open and fair, and the most efficient way to get the project constructed. Please note that in deference to community concerns about some elements of the design, the County pushed back the design package to attempt to address items that could feasibly and reasonably be addressed. As discussed in the attached letter, the project's bid opening date, originally December 23, 2015, was postponed four (4) times. These postponements were implemented for various reasons; the last postponement was to allow for the development of design modifications to address input gathered at the January 10, 2016 public meeting in Honoka'a, as well as input provided in prior communication with community members. Bids were finally opened on February 11, 2016, and the project came in above the County's estimate. The County is currently determining what scope of work will be incorporated into the construction effort taking in to account all considerations such as public input, departmental need, availability of funding, etc.

Concerning extension of the comment period, the County was not able to extend the comment period because it is prescribed by State law, but late comments posted within a few days after the comment period ended were considered and included at the County's discretion. Other than a few comments received about a month after the comment period, which reiterated the points made in earlier comments, as well as a petition in support of the ballfield, there were no other late comments. Please

note that the 30-day comment period applies only to the Draft EA. The County continues to welcome dialogue on the project outside of the particular context of the EA.

In answer to your specific comments:

1. *Demand for baseball/softball facilities overstated, and using the field for baseball/softball would restrict other uses.* P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. The presence of a ballfield does not restrict all activities. When not in use for organized ball sport functions, numerous varieties of recreational activities, both formal and informal, may be undertaken successfully thereat. The proposed walking path will substitute for some of the walking activity that currently occurs there, and will offer a facility that P&R has learned is very much appreciated in other communities. There will be opportunities for yoga classes in other parts of the park. Although the space available for these sorts of general recreation may be reduced and changed from what was formerly available, the addition of a pavilion with restrooms will also improve the general experience at the park.
2. *Plan should delete ballfield.* A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community.
3. *Support for restrooms and ADA compliance.* Thank you for your support for this aspect of the plan.
4. *What is basis for statement in Draft EA that "land within the park was formerly part of a traditional landscape that was heavily utilized for cultivation." If lands within the park were indeed used for traditional farming, it would be culturally appropriate to revitalize and adapt these agricultural traditions for a 21st-century context. In addition to being culturally appropriate, such an alternative use for the park would conform to all three themes that express the basic purpose of the Hawaii State Plan.* Archaeological and land use documentary sources clearly indicate that this belt of the Hamakua coast was used for farming. Please see Kelly 1981, Kirch 1985 and particularly Cordy 1994 for academic discussion (references contained in EA). Firsthand 19th century accounts from William Ellis (1963) as well as Isabella Bird's *Six Months in the Sandwich Islands* confirm this. However, the argument that a ballpark is thus not culturally appropriate and the land should be converted to farming is specious; this could be applied to all other uses for the former agricultural landscape, including homes, stores and schools. It would be nonsensical to give up the park and allow only farming, particularly within a community surrounded by thousands of acres of barely utilized farmland.
5. *Keeping the landscaping that was planted by residents.* Pursuing the highest and best use of the site to address the diverse recreational needs of the community in a manner that develops optimum relationships between primary recreational functions and appurtenant infrastructure sometimes results in the need to remove existing plants, either directly for those new improvements, or indirectly due to associated site grading work. It is the County's policy and P&R's current general practice to landscape using predominantly endemic/indigenous trees; planting new fruiting trees similar to what currently exists will thus not occur.

6. *Maintenance costs.* P&R is confident that the proposed improvements can be properly maintained utilizing existing resources and will budget additional resources if and when found inadequate. The County is very cognizant of the importance of properly maintaining both its current inventory of recreational facilities, sites and amenities as well proposed developments. P&R has already considered the necessary allocation of resources to properly maintain this improved park and will continue to evolve its procedures and resources to accommodate actual use and demands of this park as well as others.

7. *Oppose Little League field, chain link fence and herbicide use.* The need for a little league field is discussed in the answers above. The Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

P&R utilizes herbicides in a very careful and specific manner and all staff involved in the handling and application of herbicides are properly trained and provided appropriate personal protective equipment. When used in this manner, herbicides are a highly effective means to control the growth of undesirable plants and allow the department to accomplish its work in the most efficient manner possible. The Department, and the County as a whole, does not have the resources to adopt an herbicide-free policy and still maintain all of the parks, rights of way, and other lands to the level expected by and deserved by the public.

8. *Loss of celebration venue.* P&R will attempt to accommodate gatherings such as weddings, first-birthday luaus, etc., through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park.

9. *Alternatives.* P&R believes that the Alternatives section of the Draft EA accurately states the feasible alternatives necessary to accomplish the purpose and need of restoring a park that was built to accommodate baseball and softball with facilities that accomplish that. We understand that your organization does not share the view that these facilities are needed and that you propose a complete alternative vision for the park, but in P&R's view, this does not decrease the need.

10. *Drainage area calculations.* Currently, runoff sheet flows towards the makai portion of the property. According to the drainage calculations, the proposed improvements increase total runoff by

approximately 4 cubic feet per second (cfs). However, a majority of the runoff would be captured by shallow drywells dispersed across the property. The amount of sheet flow towards the makai portion of the property is decreasing by approximately 6 cfs (less than existing condition). Detailed drainage calculations have been approved by the Department of Public Works and are available upon request.

11. *Modeling of sound levels and noise mitigation.* The EA is not required to model the noise that would temporarily occur throughout the site as a result of various sources such as compressors, engines or other construction equipment. It is important to bear in mind the scale of the project, which is remodeling of an existing County park that includes light grading and construction of two small structures, similar to building a single-family home. The modeling you suggest would be an extraordinary, highly expensive computational effort that would not result in any data or actions that would protect the environment. Instead, the County intends to ensure that the project conforms to noise regulations. As part of construction, the DOH will work with the contractor to review the construction plan and the surrounding environment and determine if there is potential to violate community noise standards. Noise pollution is regulated by the State Department of Health which has set specific decibel levels into three classes based on land use. Hawai'i Administrative Rules Title 11, Chapter 46, Community Noise Control contain the specific sound levels in A-weighted decibels (dBA), a measurement based on human hearing. The maximum permissible day and night levels vary by zoning district and time of day. Urban-zoned areas are classified as Class A lands, in which sound levels during construction may not exceed 55 dBA at the property boundary at any time of the day for more than 10 percent of the time within any twenty minute period, except by permit or variance. Impulsive noise – derived from activities such as hammering, pile driving, and explosion – shall be 10 dBA above the maximum permissible sound levels. Construction equipment with a motor and/or exhaust system shall operate with a muffler, except for pile hammers or pneumatic hand tools weighing less than 15 pounds. Earthmoving equipment can generate high levels of noise during construction, which will occur in the daytime. Mitigation measures include timing restrictions and ensuring that equipment has proper mufflers. In very sensitive situations, noise barriers and low-decibel engines can be employed to reduce the noise below standards. The mitigation information has been added to the Final EA.

12. *Projections as to the amount of dust and exhaust generated from construction? How long will it last? What will impact be on homes adjacent to park? What would conditions be like during drought? What would conditions be like with trade winds? What direction would it blow during various times of year and varied times of day? Enforcement?* As with noise, it is not reasonable to develop a detailed 3-D atmospheric model that accounts for weather and varying construction activities throughout the site and throughout the progress of construction. For work on a small project such as a park remodeling to be conducted in conformance with Chapter HAR 11-60.1 means that all vehicles must maintain their emission control features in good working order and that dust must be minimized through grading practices and dust control (usually watering). Enforcement is generally through citizen reports to the Department of Health, although if you believe that construction-activity emissions are affecting your property, you may also call P&R. The mitigation information has been added to the Final EA.

After the project is completed, dust will be only a minor concern most likely associated with active use of the ballfield. The current ballfield design specifies skinning of just the base paths rather than the entire infield, although the latter is a more preferable option for older youth baseball and softball users. However, minimizing dust is a concern and until the field is in existence for a period of time and dust is found to not be a problem, the department will not consider skinning the entire infield. Dust from

active use of the field may be mitigated by users via a light application of water prior to and during play as hose bibs will be provided at the fields for that purpose as well as for maintenance use.

13. *Light nuisance.* Once again, it is not reasonable to model the amount of quantity of light that will occur in all areas of the site and adjacent areas during all possible conditions. The lighting will be typical of that found in any small, neighborhood County park. The pavilion and comfort station will have ceiling mounted lights. Lights will turn on at dusk and turn off by 11pm. Please note that there are NO LIGHTS for the baseball field or basketball court. This information has been added to the EA.

14. *Omitted old-timers statements concerning opposition to park plan.* The Draft EA did not mean to imply universal support or opposition by any group. Early consultation for the EA solicited opinions from a variety of organizations, agencies and all park neighbors. ALL COMMENTS that were received were included in Appendix 1a. Please note that the Final EA includes all comments received in response to the Draft EA, as well as the responses to these comments, as well as consideration within the EA of the points made in these comments letters. This will provide a detailed record of opponents who provided written comments, regardless of the length of time they have been in the community.

15. *Studies that support idea that loiterers and those engaged in illegal activity would actually be a problem, and the effectiveness of the fence proposed plan in dealing with this.* P&R has conducted no systematic studies of the potential for various types of undesirable activity that may occur in a park, and has no plans to do so. However, P&R personnel are familiar with this type of activity at many parks. Although it tends to be much worse in urban areas, it can occur throughout our island. A chain link fence is not proposed as a universal solution to these or other social ills, but it does serve to keep vehicles out of the site outside authorized hours, and unauthorized vehicles are a source of much of this activity. As discussed elsewhere, concerns about the fence led to some design changes that eliminated it in some areas and made it less intrusive in others.

16. *Traffic is a real problem in Kukuiahaele Village that will increase with the park.* No systematic traffic studies were done, and no projections of traffic increase were made. There are neighborhood parks in communities throughout the island of Hawai'i with the same modest level of facilities as those being proposed, and P&R is unaware of any major traffic issues. Large events such as parties sometimes draw a number of vehicles, but this already occurs at Kukuiahaele Park. In fact, your letter states concern about the scale of such events being limited by restoring the ballfield to Little League and softball uses. However, P&R understands the concerns about increasing traffic. The County intends to monitor this situation. If justified, mitigation can be implemented through a reasonable combination of legislative action (e.g., lowering speed limit), roadway improvements (e.g., repaving, shoulder improvements, additional signage, speed humps, etc.) as appropriate and allowable by working through DPW, and enhanced enforcement through the Police Department.

17. *Loss of the ballfield as a site for overflow parking.* Events that require hundreds of parking spaces may no longer be accommodated on the site once the ballfield is restored to ballfield use. Events that have slightly over 30 vehicles, which are expected to be relatively infrequent, can be accommodated by on-road parking. The County will continue to monitor this situation.

18. *Property values.* P&R does not concur that a community park constitutes a locally undesirable land use such as a landfill that lowers property values. On the contrary, studies analyzed by the American Planning Association have shown that proximity to parks is valued by homeowners, especially those with children, and that parks can make a community and a neighborhood more desirable, not to

mention healthful (see, for example, <https://www.planning.org/cityparks/briefingpapers/economicdevelopment.html>). This information has been added to the Final EA.

19. *Significance of Kukuihaele Road as site of former footpath.* The proposed park improvements do not affect the cultural significance of this resource, which was converted into a road over a hundred years ago. The statement about the 10-foot road widening setback was made to indicate simply that the park does not intrude into this administrative area.

20. *The project would greatly mar the rare open-space, scenic beauty of the park, and is a significant violation of Section 7.2. (GOALS -NATURAL BEAUTY) of the General Plan.* P&R does not concur with the notion that utilizing an active park for its intended (and indeed, historical) purpose creates adverse scenic impacts. Parks have some necessarily utilitarian aspects, but in general they are scenic assets in a community. Although some may find the appearance of a ballfield unlovely, for many park users, a ballfield and its associated features such as dugouts are welcome sights that evoke happy feelings and are redolent of history. As stated in the EA, no areas of natural beauty noted in the General Plan are affected. However, out of deference to community concerns, the fences have been reduced and in some cases replaced by other features. Please refer to the Site Plan change summary provided above.

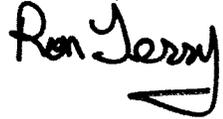
21. *Significance criteria.* P&R has examined your critique of its conclusions regarding significance criteria and respectfully does not concur with your evaluations that the project would significantly affect the environment in an adverse way and that an EIS is necessary.

22. *Violation of due process.* As stated above, P&R's actions concerning the bid were legal. In deference to community concerns about some elements of the design, the County pushed back the design package to attempt to address items that could feasibly and reasonably be addressed.

23. *Absence of transparency.* The County has discussed the need for an EA and the fact that it would be prepared in various public meetings. An early consultation letter was sent to all neighbors abutting the park, and later a notice announcing availability of the EA was also sent. The consultant for the project talked to seven members of the community about the EA just before it was published. Thus the statement that only one person was aware of the EA would not appear to be accurate, but P&R acknowledges that more could have been done initially to publicize the EA. Later, however – and several weeks before the close of the comment period – a large group of citizens did become aware of the EA and the ability to comment on it, which accounts for the number of comments that were received. As discussed above, the County was not able to extend the comment period, but late comments posted within a few days after the comment period ended were considered and included at the County's discretion. Other than a few comments received about a month after the comment period, which reiterated the points made in earlier comments, as well as a petition of support for the ballfield, there were no other late comments. Please note that the 30-day comment period applies only to the Draft EA, and the County continues to welcome dialogue on the project.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

RECEIVED

December 6, 2015

2015 DEC -9 PM 12:42

Comments for the plan to "upgrade" Kukuihaele Park.

David and Dallas Allen

PARKS DEPARTMENT
COUNTY OF HAWAII

48-5357 Kukuihaele Road AND 48-5342 Kukuihaele Road

Honokaa, HI 96727

We own property on both sides of the park.

808-775-0100

The process of "taking comments" at the first two meetings with Mrs. Valerie Poindexter was not friendly to anyone who had a question. The returning answer to the question was "well you are against the park". She also demeaned anyone new to the area and waxed repeatedly about the great community during the "sugar days". This made it almost impossible to get any information from her. When asked directly about the proposed plan for the park she said that it was not available because it was on a napkin! It took me another month to get the copy of the proposed plan. The comment period is not even closed yet and there are people doing work in the park which when asked Mrs. Poindexter said she did not know what they were doing. I spoke to the workers and they told me it was for soil samples for the park improvements.

After studying the drawings for the proposal I am writing my comments listed below:

1. I want a traffic impact study as the one done citing minor increases in traffic was done over a period of three hours. We live on what is essentially a one lane road. There are several areas of the road and a bridge that only one car at a time can negotiate.
2. I want a pedestrian impact study as the locals in this village use the road as a walking path as there is nowhere else to walk. This starts at Tiger Camp and extends all the way to the Waipio lookout.
3. The upper road was built years ago to take the traffic OUT of the village and now there is an effort to put it back here with the addition of ADA compliant bathrooms that every guide book will share. The Waipio' LOOKOUT needs the bathrooms first!
4. I have lived across the street from the park for over 8 years and I have never seen a "security issue" and have witnessed dozens of well-behaved parties on the flat area. There is NO basis for locking up the park and excluding all the local people except during daylight.
5. I do believe that there should be NO fence that is locked or not. We have no trouble here.

6. The fence would only keep us out except during the Park times which we do not seem to get to choose.
7. The budget for maintenance is laughable and nowhere near what it takes to keep the present park mowed.
8. The plan for a baseball diamond that is also fenced would not allow for any gatherings as the local people from all over the island now use. I have always cruised the park for trash after big gatherings and have never picked up more than a small paper sack of debris that is mostly windblown.
9. There are 5 picnic tables and the new "improved" plan only has 3. We have groups of more than 200 and how is this going to work with 24 parking spaces and NO overflow? Not acceptable.
10. The proposed plan cuts down four avocado trees and all the bananas that many people in our village eat. The proposal is also to plant Koa trees here which die in a few years due to the elevation. We planted 4 Koa trees even though we were told about the elevation and there is now only two and both are not looking good.
11. WE, my wife Dallas and I, cherish and love this park and village.

I feel that our democratic process of sharing and communicating with the locals here was VERY FLAWED and put on a fast track to construction. I cannot find anyone who likes the plan.

Before we came to Hawaii I was on the District School Board for 5 years and the budget committee for 10 years. As chairman of the board I know what a public meeting is supposed to look like. The meetings attended by our council person were not even close to informative.

Sincerely,

A handwritten signature in black ink, appearing to read "David Allen", with a long, sweeping underline.

David Allen

A handwritten signature in black ink, appearing to read "Dallas Allen", with a long, sweeping underline.

Dallas Allen

geometrician

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integrating geographic science and planning

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March 7, 2016

David and Dallas Allen
48-5357 Kukuihaele Road
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. and Ms. Allan:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 6, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1 and 2. *Need for traffic impact study and pedestrian impact study.* Although no systematic traffic studies were done, and no projections of traffic increase were made, there are neighborhood parks in communities throughout the island of Hawai'i with the same modest level of facilities as those being proposed, and P&R is unaware of any major traffic issues. Based on what P&R believes will be minimal effects, the traffic situation can be monitored by P&R, DPW, the community, and the County Councilperson. If so desired, mitigation can be implemented through a reasonable combination of legislative action (e.g., lowering speed limit), roadway improvements (e.g., repaving, shoulder improvements, additional signage, speed humps, etc.) as appropriate and allowable by working through DPW, and enhanced enforcement through the Police Department. P&R has consulted with DPW and believes that the very minor increase in traffic will not overtax road or bridge infrastructure.

3. *Do Waipio Lookout restrooms first.* The park is primarily intended to accommodate the needs of the community (Kukuihaele and surrounding areas) and not as an alternative rest stop for Waipi'o Valley visitors. However, it is a public park and the amenities there will be available to everyone as is the situation with all public parks island-wide. P&R has implemented certain design elements to dissuade large passenger vehicles from using the park solely as a rest stop for its riders. It is also expected that solutions to the restroom situation at the Waipi'o Valley Lookout will be developed in the near future, reducing this as even a minor area of concern.

4. *Security issues are non-existent and people should not be locked out.* A chain link fence is meant to keep vehicles out of the site outside authorized hours. It is P&R's experience that parks throughout the island can attract unwanted activity, and unauthorized vehicles are a source of much of this activity. Pedestrian access is provided for when gates are closed. Security issues related to preserving the integrity of recreational amenities that can be readily damaged by vehicles and miscreant behavior is a real issue at parks islandwide. The appropriate placement of chain link fencing enhances the security of adjoining property owners whether by mere indication of the physical limits of the public park or as a reasonable deterrent to those that may consider using the park as a means to illegally access private property. County parks are typically open for public use from 6am through 11pm every day of the year, though the Director has the authority to further restrict park hours. The County is not proposing to lock anyone out of the park during authorized park hours and it remains to be determined whether the park will be locked at all as that is an administrative and operational determination that has yet to be made.

5-6. *Oppose fence.* P&R acknowledges your opinion on this. In response to community concerns, the proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. However, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occurs there, for now and in perpetuity.

7. *Maintenance.* P&R is confident that the proposed improvements can be properly maintained utilizing existing resources and will budget additional resources if and when found inadequate. The County is very cognizant of the importance of properly maintaining both its current inventory of recreational facilities, sites and amenities as well proposed developments. P&R has already considered the necessary allocation of resources to properly maintain this improved park and will continue to evolve its procedures and resources to accommodate actual use and demands of this park as well as others.

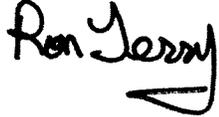
8-9. *Foreclosing opportunities for large gatherings.* P&R will attempt to accommodate gatherings such as these through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park.

10. *Existing planted landscaping and koa trees.* Pursuing the highest and best use of the site to address the diverse recreational needs of the community in a manner that develops optimum relationships between primary recreational functions and appurtenant infrastructure sometimes results in the need to remove existing plants, either directly for those new improvements, or indirectly due to associated site grading work. It is the County's policy and P&R's current general practice to landscape using predominantly endemic/indigenous trees; planting new fruiting trees similar to what currently exists will not occur. As discussed in the attached letter, the koa trees will be replaced by a different species, possibly milo, which will be determined later in the design or construction phase.

11. *Love for park.* We acknowledge your residence in and knowledge of the area, as well as your love and care for the park, and we appreciate the time you have taken to share your views in person, by phone and in letters. We hope that future meetings on the park, and other issues in the community, are conducted and participated in with a spirit that befits a cooperative community in a historic area.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a horizontal flourish that extends to the right and then curves back under the name.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

James Komata
Park Planner
Dept. of Parks and Recreation
County of Hawaii
101 Pauahi Street, Suite 6
Hilo, Hawaii 96720

December 8, 2015

Aloha Mr. Komata,

I am submitting this letter to you in support of the proposed Kukuihaele Park improvements as presented in the Draft Environmental Assessment (DEA) of November 2015. I have reviewed the DEA and all related documents and believe it to be an authentic and accurate representation.

I am a member of the John I. Kanekoa 'Ohana of Waipi'o Valley and Kukuihaele Village and while my family is no longer in possession of our home site in Kukuihaele, I remain active with our fee simple and Bishop Museum leasehold properties in Waipi'o Valley. I am also a 20+ year member of the Waipi'o Taro Farmers Association and have been actively involved in the founding of the newly formed Waipi'o Valley Stakeholders Alliance—which includes an interest for our sister community of Kukuihaele Village.

I attended the Kukuihaele School in the early 1950's when the Park was our playground. I learned how to play baseball at the Park and went on to play in the Far Eastern Little League World Series, American Legion Baseball and even considered playing professionally—as a result of my love for the game, first inspired and born from my experiences at the Park.

As noted in the DEA, for many years (and generations) our Kukuihaele community has envisioned and sought for the much needed Park improvements for the many family and community events that have taken place at the Park. It is our hope that after several arduous efforts from many community members over the years, we may finally succeed in obtaining the needed and desired Park improvements.

In addition to my support for the Park improvements as represented in the DEA, I would like to comment on the current process for procuring community input and determining whether there is sufficient support from our community, for the proposed Park improvements.

First, I would like to acknowledge and commend the sincere and much appreciated efforts of our Hamakua District's Councilwoman, Valerie Poindexter—who expeditiously responded to our longstanding community's plea for the Kukuihaele Park improvements.

Councilwoman Poindexter has demonstrated her genuine interest and regard for our Waipi'o Valley and Kukuihaele Village communities by requesting and attending meetings with individual stakeholders and locally organized groups including the Waipi'o Taro Farmers Association, Ha Ola o Waipi'o Valley, members of the Waipi'o Community Circle and the Waipi'o Valley Stakeholders Alliance. Although there was not a formal organization representing Kukuihaele Village when she began seeking input directly from the Kukuihaele community, our Councilwoman attended a meeting of an informally-organized group of Kukuihaele Village residents and also organized and hosted two additional Kukuihaele community meetings to solicit input for the development of a Kukuihaele Park improvements Plan.

It was evident at the first and second meetings that there was a minority group (of less than half dozen) “new residents” who were in opposition to the ideas for the Park's improvements and only one member of their group attended the third and last meeting with the Kukuihaele community—at which time various County representatives, including the County's Parks and Recreation Dept. presented tentative details of the

proposed improvements, including a blueprint of a new design for the Park, based on current community-wide input.

It is unfortunate that this small group of disgruntled new residents have taken the deceptive steps of quickly and formally organizing themselves (in early December 2015) as the “Kukuihaele Neighborhood Association” and are falsely portraying themselves as representing the majority of the Kukuihaele community.

[It should be noted that at the second Kukuihaele community meeting, a vote was taken from the 50+ attendees and all but approximately half dozen individuals (mostly new residents) were in favor of advancing the proposed improvements.]

In addition to formally organizing themselves, this group of new residents are claiming that “due process” was violated and there was insufficient time allotted for community input, using inflammatory terms and asserting that “most people in the community are still unaware that the current park is set to be “demolished” and replaced with a baseball park. They are also demanding an extended period of 45 days for community members to examine the DEA and provide comment and threatening legal action if their demands are not met.

Still further, unsatisfied and inferring that our County government has not acted appropriately they have taken their appeal beyond our County representative’s—up to State and Federal levels for their support and endorsement.

This kind of mindset and behavior is what makes it so difficult and challenging to accept and integrate new people into our local communities and should not be tolerated or supported, particularly by our government officials. I encourage all of the government representatives who have been called upon by the Kukuihaele Neighborhood Association to carefully examine their claims and seek out who is the true majority voice for Kukuihaele Village—before lending their support or taking any action in favor of the Kukuihaele Neighborhood Association.

In addition to the opposing position which the Kukuihaele Neighborhood Association has taken, I am also aware that there are other community voices who do not agree with the entire plan as proposed but the majority of whom are in favor of at least the Pavilion, ADA Toilets and parking lot. Although I am in favor of providing a baseball diamond for the opportunity of our younger generation to learn and develop baseball skills, as I was afforded, I am willing to relinquish that part of the Park plan if budget constraints dictate a reduced version of the plan—but I support the minimum of the Pavilion, ADA Toilets and parking lot.

In closing, I do not believe our County of Hawaii officials have violated due process and have in fact, followed the applicable laws and have also been very mindful and responsive to our Waipi’o Valley and Kukuihaele Village communities.

Me Kealoha Pumehana,
Doug Genova

geometrician

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integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Doug Genovia
dmail808@yahoo.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Genovia:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 8, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Background and history.* Thank you for the information on your deep connection to the area and familiarity with the history of the proposal to improve the park.
2. *Preferred park facilities if there is a budget constraint.* We note the priority you believe there should be for a pavilion, ADA restroom and parking lot.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090; for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Sunee Campbell [mailto:sunrae15@outlook.com]
Sent: Tuesday, December 08, 2015 6:41 AM
To: Komata, James <James.Komata@hawaiicounty.gov>
Subject: Kukuihaele Park

Aloha James

I am sorry for responding about the Kukuihaele Park the last day for community comments. I am sharing our pros and cons for the park plan form our Ohana which is 6 adults and 2 children. We have been a resident of Kukuihaele for over 15 years.

Thank you for all the wonder vision for our park and community.

Our park is such an open space to enjoy for all the families gatherings and community events .

With that said I would like to say that the current plan is the grand Hilton when we would be satisfied with an Uncle Billy's. I see for many of the residences that the park is used like their back yard for many have very small lots and the park is the open space they enjoy.

We have been promised for 15 years plus that our park would get a bathroom and a pavilion. Our Ohana would support the bathroom, pavilion and the re surfacing of the basketball court. We would like to see the rest of the park left as open space. A non formal baseball field ,as was before, can be add in the area on the plan which is more than enough to coach children and for the community to have fun games. A formal field with dugouts is an invitation for more traffic on a over used, unsafe community road. We do not support the fencing of any of the park area.

I have been on the listening end of many of the new residence who live near the park and hear they are not supportive of the current plan. We who have lived here for some time wish to work with the county to create a plan that we all can feel good with and that our children will grow up with and those that come after us. Our Ohana does not wish to stop the county's effort to provide our community with the much needed park improvements. We do hope we all can come to a consciences on what that plan looks like.

Mahalo for the effort for our community

Sunee Campbell
Lynn Dehmer
Rhavi Campbell-Dehmer
Tihana Lactaoen-Campbell
Noah Campbell-Dehmer
Brittany Racz
Naleina Campbell-Dehmer
Kalena Campbell-Dehmer

Sent from Windows Mail

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Sunee Campbell
Sunrae15@outlook.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Campbell:

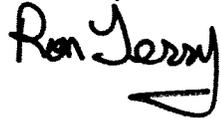
On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 8, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Support for various park elements.* Thank you for the information on deep connection to the area. We note your support for a pavilion, restroom and resurfacing the basketball court, with the baseball field left open and informal.
2. *Oppose fencing.* As described in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. As an option, the fence may be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090; for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, sweeping flourish at the end.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Noland [mailto:hukikalohawaii@gmail.com]
Sent: Monday, December 07, 2015 9:00 PM
To: Komata, James <James.Komata@hawaiicounty.gov>
Cc: dmail808@yahoo.com; jesse.k.potter@gmail.com
Subject: Kukuihaele Park

James,

While i don't reside in the Kuikuihaele area, i have had the honor of being able to grow up in this community. Being up-wards of 56+ in years the 40 somewhat years ago, instilled a real sense of community back then for a desire to still be apart of this community to this day as the Waipio Taro Farmers Association President and also a member of the Wapio Valley Stakeholders Alliance. My roots are such that my Dad and his parents and grandparent are buried just 1/4 mile away at the Kukuihaele Cemetery and till this very day i continue the taro farming tradition. The Park back then had the basket ball court, remnants of the baseball field diamond and restrooms (that were located at the makai / Hilo corner of the park), my cousins and friends met regularly for pick-up games of basketball, volleyball and baseball (some of us excelled...i didn't). But the Park instilled values of sportsmanship, honor, trust....all the things that come with team sporting events. I feel that the real community has waited patiently for this park opportunity for too long already and i cannot stand back and watch as a few 'relatively new-comers' come in and dictate what our community needs. I attended the 2nd and 3rd meeting coordinated by Val Poindexter, the over-whelming community passion displayed at the 2nd meeting was a direct result of the grapevine news that circulated amongst the community by things that the newly created Kukuihaele Neighborhood Association (aka new-comers...) made, this group claimed to represent the greater community. It is my opinion that the born and bred community didn't attend the 3rd meeting because of the overwhelming support that was shown in the 2nd meeting, (as you can imagine, this is the working class people), they thought that the park was a done deal. So while the neighborhood association may claim that they were unable to voice their concerns in the 2nd meeting, i was in attendance and i can confirm that they did voice their concerns and opinions and while it may not have been well received, did they really expect that the majority would cheer them on??? Did they indicate who attended the 1st meeting, my understanding was that it was primarily their group only, as such then where is the fairness?

Let me know if you have any questions.

Aloha,
Noland Eskaran (of the Toko and Kala Ohana).
53 Manulele Street
Hilo, Hawaii 96720

Sent from my iPad

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Noland Eskaran
hukikalohawaii@gmail.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Eskaran:

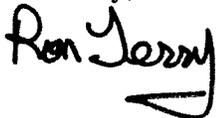
On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 7, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Recollections of Kukuihaele Park 40 years ago.* Thank you for the information on your connection to the area and the remembrances of when Kukuihaele Park was a haven for organized and pickup sports.
2. *Impressions of public meetings.* Thank you for providing your understanding of the how the public meetings proceeded.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

-----Original Message-----

From: Epenesa, Lala

Sent: Wednesday, December 02, 2015 7:58 AM

To: Honma, Clayton <Clayton.Honma@hawaiicounty.gov>; Komata, James
<James.Komata@hawaiicounty.gov>

Cc: Poindexter, Valerie <Valerie.Poindexter@hawaiicounty.gov>

Subject: Kukuihaele Park Improvements

Aloha Clayton & James,

Just wanted to let you guys know I am in full support of the improvements we have planned at our Kukuihaele Park. I think this will help alot with opening spaces as far as the amount of different sports teams using our facilities for practices and games and the limited fields/courts we currently have, and some of the children whos parents have to drive out to honokaa or paauiilo parks and majority of players are from the kukuihaele area.

For the moms, dads, grandparent, aunties, uncles who bring little ones to enjoy the honokaa park instead because there are fully functional restrooms and not just a port-a-potty, running water to either drink or wash their hands, but just a park for the community to enjoy and not having to drive an extra 15-20 minutes when there is one sitting right in the middle of their own community.

I know that there is some opposition to this project, and dont know their reasons why, but have spoken to and heard from alot who have lived in the area for a long time and with this community growing every year, I do agree that there is a need for a park in this community and with the improvements planned it's the perfect place.

Thank You for your time.

Mahalo,

Lala Epenesa

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Lala Epenesa
No address provided

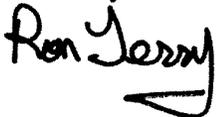
Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Epenesa:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 2, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

We appreciate the statement of support for the park plans that you provided. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Dardee [mailto:Dardegirl@yahoo.com]
Sent: Monday, December 07, 2015 11:22 AM
To: Honma, Clayton <Clayton.Honma@hawaiicounty.gov>
Subject: Kukuihaele Park

Aloha Clayton,

I just wanted to drop you a line to express my joy in knowing the country is finally going to upgrade the Kukuihaele park!

My ohana and I feel it is a vital project for the area. The children in the area will have a better place to play, closer to home and Ohana's in the area will have a better facility to gather.

As we both know in this day and age of electronic devices it is so hard for parents and grandparents to get the keiki outside! We also know the importance of outdoor physical activity. Thus the greater appreciation from my ohana that a baseball diamond is also planned to be put in to the park.

I understand there is some opposition to the plans, however i feel that when looking at the bigger picture, the future of our keiki, i feel we need this park.

Thank you for your time and for allowing me to share my thoughts.

Happy Holidays!

Darde Gamayo

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Dardee Gamayo
Dardegirl@yahoo.com

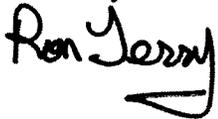
Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Gamayo:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 7, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

We appreciate the statement of support for the park plans that you provided. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: michael gray [mailto:kokuays@gmail.com]
Sent: Friday, December 11, 2015 1:22 PM
To: Komata, James <James.Komata@hawaiicounty.gov>; Mayor's internet email <cohmayor@hawaiicounty.gov>
Subject: Kukuihaele Park improvements

December 11, 2015

Dear Sirs;

We have been examining the proposed "improvements" to the Kukuihaele Park and find some glaring omissions and mis-representations in the E.A. statement, and have issues with the planned "improvements". I also strongly object to the method of outreach to the concerned community about the details of this project.

EA comment

Traffic survey was done in a couple of hours and there was no mention of what the weather was during that time, inclement weather reduces the number of tourists traveling from the Waipio Lookout. A thorough traffic analysis should be undertaken to adequately and accurately determine the effect of this park improvement. (Millions were spent building the by-pass hwy. and with the proposed addition to the only ADA compliant restroom for 8 miles, will impact the traffic.)

In addition, there is no mention of the one lane bridge on the valley side of the park, the severely eroded culvert within 200 yards of the proposed park entrance, or any mention to the impact to pedestrian use of the village road. This is a primary concern of ours since the reason we are here is the village atmosphere and the lack of motorized traffic, that would be negatively impacted by the proposed park improvements.

The EA also states that the improvements do not obstruct the view, the plan clearly shows buildings , and fences which do obstruct the view.

No attempt to establish demographics for the practicability of a little league field were included.

There was no mention of the possible economic effects of having this park built within 75 yards of my home, or the social impact it would have. We request that these issues be addressed.

Pedestrian traffic study was not done. There are no sidewalks on Kukuihaele Road and many residents and guests walk this road.

The Plan:

In examining the plan posted on line:

The plan does not show lighting, which we hope there is none.

We noticed that Koa trees were included in the plantings, common knowledge tells us that Koa does not grow well at this altitude, and would obstruct the view if they were successful.

The proposed location of the pavilion and restrooms are in a position to block the views, when they could be located on the Honokaa side of the park. Here, all views would be over the top of the structures, and in an area where they would be most convenient to the community using the facilities, which could leave all the existing fruit trees that currently benefit the community.

The ball field effectively stops the use of the park as a gathering place for weddings, funerals, keki parties, reunions, and all large family/community gatherings, which has been the primary group use of the park since the Community Center was lost to privatization.

Financially:

How will such a proposed park be maintained. The P&R have struggled to keep the current park grass mowed, due to , I am informed, budget constraints. The proposed park would require a budget multiple times the amount now allocated, with buildings and plumbing fixtures to be cleaned and maintained gates to lock and unlock, ball field to maintain. The fences require much more time to weedwack, the trash will need more frequent collection. It is also a fact of our lives that vandalism will be a factor and improper use of the park for illegal activity, and homelessness. All of these issues will require continued expenditures.

We request that an Environmental impact study be undertaken to address the traffic and pedestrian implications, the social economic impact including noise and light pollution both during and after construction and the effect of the work on my property value, water runoff, sewage percolation studies.

We await your responses
Sincerely,

Mary E. Gray
Michael R. Gray
48-5370 Kukuihaele Road
Honokaa, 96727
Kokuays@gmail.com

geometrician

ASSOCIATES, LLC
integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Mary and Michael Gray
kokuays@gmail.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. and Mr. Gray:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 11, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Object to outreach.* Please understand that P&R has very limited staffing and funding and tries to prioritize staff time to best fulfill the recreational needs of our large County. Despite the fact that there were four community meetings on the project held by P&R and/or Councilperson Valerie Poindexter, P&R realizes that earlier and more significant public involvement could have been conducted. This would have allowed some of the issues and opinions that are surfacing at the Draft EA to be addressed earlier. However, P&R has sincerely tried to listen to community concerns and modify some elements of the park design to meet these concerns, even though not all residents will be fully satisfied with all of the features. Please see the attached letter regarding the outcome of outreach after the Draft EA.
2. *Inadequate traffic survey, one-lane bridge, negative impact of traffic.* P&R understands the concerns about increasing traffic. As stated in the EA, Kukuihaele formerly has a much greater population and a higher level of traffic, and it was still a healthy, thriving and happy community. The small level of traffic increase associated with improving a County park is not expected to stress the village or cause safety problems. P&R has consulted with DPW and believes that the very minor increase in traffic will not overtax road or bridge infrastructure. However, the County intends to monitor this situation. If justified, mitigation can be implemented through a reasonable combination of legislative action (e.g., lowering speed limit), roadway improvements (e.g., repaving, shoulder improvements, additional signage, speed humps, etc.) as appropriate and allowable by working through DPW, and enhanced enforcement through the Police Department.

3. *View obstructions.* The Site Plan has been designed to minimize impacts to views consistent with improving the park. Parks have some necessarily utilitarian aspects, but in general they are scenic assets in a community. As stated in the EA, no areas of natural beauty noted in the General Plan are affected. However, out of deference to community concerns, the fences have been reduced and in some cases replaced by other features. Please refer to the Site Plan change summary provided above.

4. *Little League demographics not adequately studied.* P&R did not conduct a socioeconomic study of little league demand in Kukuihaele, Hamakua or the County of Hawai‘i, and P&R is unaware of any hard data from other sources. Little League coaches have contacted P&R and stated that more ballfields are needed in general area and a field at Kukuihaele Park would relieve competition for other nearby fields if Kukuihaele residents could play closer to their homes. Granted, some of the demand may be from outside the immediate Kukuihaele area, but County parks function not just for a specific community but for the entire County. Furthermore, it is important to keep in mind the need for fields for informal practices between parents or groups of parents and children, whether associated with an actual league or not. In P&R’s experience, these small groups are a frequent and very important user group that benefits from regulation fields.

4. *Economic effects on nearby residences.* Kukuihaele Park has been in existence for over seventy years. For most of its history it was a far more active park. All residences constructed in the area were built with the awareness of the park. Many adjacent residents actually constructed features of the park, including Paul Christensen, who led a crew of workers to construct the ballfield, a valued asset in a plantation community. To this day, some nearby residents have helped care for the park, a fact that P&R appreciates. In the modern world, having a well-managed park with healthy active uses is an asset to the adjoining community, one that many neighborhoods would envy. P&R does not concur that a community park constitutes a locally undesirable land use such as a landfill that lowers property values. On the contrary, studies analyzed by the American Planning Association have shown that proximity to parks is valued by homeowners, especially those with children, and that parks can make a community and a neighborhood more desirable, not to mention healthful (see, for example, <https://www.planning.org/cityparks/briefingpapers/economicdevelopment.html>). This information has been added to the Final EA.

6. *Effects to pedestrians.* As discussed above, the small level of traffic increase associated with improving a County park is not expected to stress the village or cause pedestrian safety problems. Similar parks are present around the County and are generally welcome additions to the neighborhood. The proposed walking track will draw pedestrians, as it has in other areas in which it has been instituted (e.g., Machado Acres Park in Hilo). However, the County intends to monitor this situation.

7. *Lighting.* The lighting will be typical of that found in any small, neighborhood County park. The pavilion and comfort station will have ceiling mounted lights and the parking lot and walkways will be lit with pole-mounted fixtures to ensure safety for evening and nighttime park users. Lights will turn on at dusk and turn off by 11pm (or sooner if the park hours are reduced administratively). Please note that there are NO LIGHTS for the baseball field or basketball court. This information has been added to the EA.

8. *Koa trees.* As discussed in the attached letter, the koa trees will be replaced by a different species, possibly milo, which will be determined later in the design or construction phase. Milo trees are moderately sized and provided shade and attractive foliage and flowers but tend not to block views.

9. *Should relocate restroom and pavilion to Honokaa side of park to reduce view impact.* As discussed above, the Site Plan has been designed to minimize impacts to views consistent with improving the park.

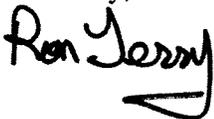
10. *Effects on gatherings.* P&R will attempt to accommodate gatherings such as these through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park.

11. *Maintenance issues.* P&R is confident that the proposed improvements can be properly maintained utilizing existing resources and will budget additional resources if and when found inadequate. The County is very cognizant of the importance of properly maintaining both its current inventory of recreational facilities, sites and amenities as well proposed developments. P&R has already considered the necessary allocation of resources to properly maintain this improved park and will continue to evolve its procedures and resources to accommodate actual use and demands of this park as well as others.

12. *Request EIS.* After considering the information developed as part of the EA, and reviewing the public comments, P&R does not envision that the project will have any impacts that would be considered significant in the context of Chapter 11-200, HAR, and intends to issue of Finding of No Significant Impact. An EIS and more detailed studies are not necessary and would be an imprudent expenditure of time, staff labor and taxpayer dollars.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

Comments on Kukuihaele Park Improvements Project

Submitted by Lori Johnson, Kukuihaele resident

December 7, 2015

Introduction

My husband, Ron, and I moved our business and family from Arizona to Kukuihaele, HI in January, 2015. Although new residents, we frequent the park multiple times per week for various activities at various times of the day and it has become an important part of our lives here. We bring our dogs there for exercise and socialization, we run sprints, stretch and even meditate there. Most importantly, we've met most of our new friends there doing some of the same things.

Both Ron and I have a background in the fitness industry and **highly** recommend that all communities provide recreational facilities for everyone to enjoy. And, while we are in favor of the proposed restroom, parking and ramada-type elements of the plan, we are highly opposed to the plans for the baseball field and the associated fencing that would negatively change the look, feel and overall usefulness of the park for a majority of Kukuihaele residents. There are several more cost-effective alternatives that would accomplish the Improvement Project's goals of providing additional recreational facilities while offering activities for even MORE residents than the currently proposed plan.

Pre-Draft EA Community Meetings

I attended two (2) community meetings at which requests for information about the park plans were made by Kukuihaele residents to Val Poindexter. We were told there weren't any plans to share – that the meeting was just to determine 'whether we wanted park improvements'. The meetings were both unproductive in all aspects. One week prior to the deadline for Draft EA comments, we see the park plans and the Draft EA comments only because a Kukuihaele resident found them online. There's something wrong with this picture, and extremely disappointing. Especially since the spirit of the park improvements, according to the Draft EA, is to give the community what it's been asking for.

Draft Environmental Assessment Comments

The following italicized statements are excerpts taken directly from the Draft EA. The text shown below the excerpts are my personal comments.

- *P&R has designed improvements to help meet these recreational needs while still maintaining much of the open space that is currently present and not overtaxing local roads. The project involves a new 27-space parking lot, including four ADA accessible stalls; a new comfort station; a new pavilion; an improved basketball court; a new softball/Little League baseball field with backstops, dugouts, bleachers, and fencing; a jogging path that winds around the baseball field; and removal of various trees to accommodate site features and new landscaping with koa and palm trees, among others.*

Read that again while looking at the plan layout – how can one honestly state that the proposed improvements will maintain much of the open space currently present? It's monopolized by a baseball field and fencing while further restricting its use rather than providing additional recreational facilities – which is one of the goals of this project. Perfect example of an ineffective use of funds.

Maintenance of the proposed plans – this is a MAJOR concern as the park as it now exists is NOT consistently maintained. Simply keeping the grass mowed more consistently opens up that entire area to numerous activities – individual and team!!

- *The improvements to Kukuihaele Park would benefit most area residents, who have repeatedly requested County officials for active recreational facilities.*

The improvements mainly benefit baseball teams, but further restrict the use of the park for a MAJORITY of residents for individual and other team uses. Are these residents repeatedly requesting a baseball field? How many residents are requesting this? And, are these individuals actually residents of Kukuihaele?

- *As illustrated in Figure 3, the site has pleasant views through to the ocean. The park itself also represents open space and a coastal view corridor for drivers on Kukuihaele Road or those residing mauka of the park. The Hawai'i County General Plan does not specifically identify areas of natural beauty within Kukuihaele itself, although the view from the Waipi'o Lookout is listed as an example of natural beauty that require consideration during development approvals. The park is not visible from the lookout.*

Due to the isolated location within Kukuihaele village, the modest scale of the proposed facilities and new development that has occurred below the park within the coastal viewplane, no aspect of the action would detract from scenic views identified in the Hawai'i County General Plan.

Regardless of the fact that Kukuihaele Park isn't listed in the HI County General Plan as an area of natural beauty, it is! Enclosing the park with chain link fencing is an eyesore to the community. What a shame to do this when alternatives exist.

- *Parks also have the potential to attract loiterers, drug users, and homeless or others who may illegally camp. The adverse effects will be mitigated by the proposed improvements to security and regulation. The park will be fenced and gated and access will be restricted to daytime and early evening hours.*

Alternative for security? Enclose and lock only the restroom/ramada facility. Fencing and gating the park is huge step toward destroying the spirit and feel of this village and the natural beauty of the park.

- *The improvements would cause traffic to increase, particularly when there were games on the baseball field or events in the pavilion. Based on experiences with similar County parks in the area, visitation is generally light except during such events, **which usually only occur a small fraction of the time.***

Exactly – then why monopolize the entire grassy area with a baseball field? The plans are not in alignment with its goals.

- *Kukuihaele Park is served by Kukuihaele Road (see Figure 1 for map and Figure 3 for photographs), a small County road that bisects the village lengthwise. This road was the main route between Honokaa and Waipi'o Valley before State Route (SR) 240 was constructed in the 1960s, bypassing the town on the mauka side. No traffic data are available for this County road, but observation during three weekdays indicates that traffic is very light. Observations during three one-hour, non-peak periods tallied traffic levels of less than one vehicle per minute (60 vehicles per hour).*

Why would a traffic assessment be done during non-peak periods?

- *Hawai'i State Plan Adopted in 1978 and last revised in 1991 (Hawai'i Revised Statutes, Chapter 226, as amended), the Plan establishes a set of themes, goals, objectives and policies that are meant to guide the State's long-run growth and development activities. The three themes that express the basic purpose of the Hawai'i State Plan are individual and family self-sufficiency, social and economic mobility and community or social well-being. The Proposed Action would promote these goals by improving recreational facilities and expanding recreational opportunities for the project area, thereby enhancing quality-of-life and community and social well-being.*

Consider that baseball is a 'team' sport – fantastic. But, then consider Kukuihaele and the number of residents who actually play baseball. It'll be tough getting enough people just to form two (2) teams! Stating again, it's highly unlikely that the baseball fields will be used by actual residents of Kukuihaele. And, the proposed plan for this space further limits its usage – it's actually disabling to individuals. This runs counter to the themes, goals, objectives and policies stated above.

Thank you.

Kori Johnson

geometrician

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integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Lori Johnson
No address provided

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Johnson:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 7, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

- 1. Based on your activities at the park involving sprints, stretching, dog socialization and meditation during your year residency, you support restroom, parking and a ramada, but oppose the ballfield and fencing.* P&R takes note of your preferences.
- 2. Community involvement was inadequate.* Please note that, as stated in the EA, the proposed improvements have been in formulation and funding planning for over a decade, so some planning occurred before you took up residence in this village. P&R has very limited staffing and funding and tries to prioritize staff time to best fulfill the recreational needs of our large County. Despite the fact that there were four community meetings on the project held by P&R and/or Councilperson Valerie Poindexter, P&R realizes that earlier and more significant public involvement could have been conducted. This would have allowed some of the issues and opinions that are surfacing at the Draft EA to be addressed earlier. However, P&R has sincerely tried to listen to community concerns and modify some elements of the park design to meet these concerns, even though not all residents will be fully satisfied with all of the features.
- 3. Maintenance is inadequate and will be a problem.* P&R acknowledges that maintaining a ballfield involves a budget commitment and pledges to implement maintenance resources necessary to keep the entire park in an acceptable condition.
- 3. Active recreational field uses as ballparks do not benefit the majority of users, especially Kukuihaele residents.* P&R respectfully disagrees with your opinion about the benefitted community. It has certainly come to the attention of P&R that there are a variety of opinions in the community about

what the current needs of Kukuihaele are. Based on the calls for a ballfield, a pavilion with restrooms and an improved basketball court that have been forwarded to P&R through the last two decades, there are clearly some who believe that these facilities are needed. It is also obvious that some residents do not value these proposed facilities. The project does not have to be a zero-sum game, in which those community members who attain the facilities they have long asked for “win”, while those who want other facilities “lose.” The park is just one point in a continuing dialogue with the community that can help bring a variety of facilities in various places that satisfy the diverse needs of a changing community. At the same time, it is important to recognize that County parks are part of a system. Although a park in a particular area may serve primarily that specific community’s residents, each park in our County is meant for all its citizens as well as the visitors with whom we share our island. Just as Kukuihaele residents are able to enjoy facilities at parks in Honokaa, Waimea, Hilo, Hapuna and other parts of the island, other island residents should be able to enjoy Kukuihaele’s facilities. Having facilities that are open to and mindful of the needs of all County users allows our citizenry to leverage the value of our parks.

4. *Fence will be an eyesore.* The Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi’o/west side of the park (nearest the adjacent houses) will remain. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

5. *Alternative for security – fencing just the ramada (pavilion) and restroom.* While it is understood that some community members object to fencing the park’s makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm’s way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner’s offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Fencing just the restroom or pavilion does not address these concerns and creates an uninviting aesthetic that is not appropriate for a public facility.

6. *Ballfields only experience heavy use a small portion of the time, and thus why monopolize a grassy area for a ballfield?* In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete. There is a mistaken impression that it requires a minimum of 18 players, 2 coaches and an umpire to merit a ballfield, when in fact, one parent and one child spending quality time in the mutual love of a sport is a typical user group, and in the view of P&R, a worthy justification for this community facility. The ability for those in Kukuihaele to walk or drive a short distance from one’s home to a home field park, where the likelihood of availability of that ballfield is more assured, is reason enough to develop this ballfield.

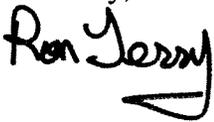
The ballfields in Honokaa primarily serve residents of Honokaa but also serve the surrounding areas, which is consistent with the plans for the ballfield at Kukuihaele. The youth and kupuna of Kukuihaele, as well as other nearby towns, have long had the benefit of driving to Honokaa to utilize the ballfields and other recreational amenities there. However, Honokaa residents has always been open to the wider community utilizing their recreational resources. The ballfield at Kukuihaele Park would complement the area's system of ballfields and strategically better serve the area.

7. *Traffic assessment conducted at non-peak hour.* No formal traffic assessment was conducted, and P&R does not believe one is merited based on the low existing traffic volumes that virtually all commenters have noted, as well as what the agency believes will be very minor impacts similar to those at other neighborhood parks.

8. *Consistency with Hawaii State Plan.* P&R respectfully disagrees with your assessment that restoring a historic ballfield to usability violates the themes, goals, objectives and policies of the Hawaii State Plan.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a small, stylized flourish or underline.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

Ron Johnson

48-5466 Kukuihaele Road, PO Box 1675, Honokaa, HI 96727
520-560-2243

06 DEC 2015

Ron Terry
Geometrician Associates
PO Box 396
Hilo, HI 96721

Re: Kukuihaele Park Improvements

Aloha Ron,

I'm a full-time resident of Kukuihaele, and am very concerned about the proposed improvements to my local park. Enclosed are my comments regarding this project and its related Draft EA and FONSI.

I do appreciate some of the planned improvements – e.g. paved parking, covered pavilion, and restrooms. However, I take issue with the following elements of the design:

- **Baseball field, including bleachers and dugouts**

This single-purpose facility monopolizes nearly all of the usable space in the park and would compromise or prevent participation in nearly every activity I currently use or anticipate using the park for – e.g. running sprints and conditioning drills in the grass, exercising my dogs, playing football or soccer, picnicking in the grass, and hosting or attending large parties.

After discussing the baseball field with my neighbors, I've not found a single person who supports this amenity nor has any desire to use it.

Also note that Kukuihaele's population is small (approx. 350 local residents) and current demographics show it to be older than the typical Hawaii neighborhood. Therefore, the likelihood of fielding a little league team of local keikis is improbable. The only baseball teams that would use this facility would be those from outside areas. Not only would this displace local residents' use of the park, but it would add a significant and troubling amount of traffic to Kukuihaele Road.

A baseball field would require maintenance and upkeep exceeding that of an open field. The county currently does such a poor job of maintaining this park that local residents often take it upon themselves to mow the grass and pick up trash. I see no mention in the plan for increasing the grounds keeping budget, so I can only anticipate the facility being poorly maintained,

particularly since most of the field's use would not be by neighborhood residents.

Because of Kukuihaele's proximity to the Waipio lookout, visitors to our park include many tourists, who would have little use for a baseball field. The existing open grass field is more welcoming and provides more aloha to our visitors.

Recommendation: Keep the open grassy field, which better supports multiple usage.

- **Jogging path**

This feature is another waste of tax dollars. Running is a popular sport, but this type of path is unsuitable for most runners. Sprinters want straight, flat sections of track. Middle distance runners want a regulation oval track to train and race on. Long distance runners want a much longer, continuous path that they can rack up miles on. No one wants to run on a short winding path that only arcs across a portion of the park.

Recommendation: Kill this feature or replace it with an oval track.

- **Chain link fence**

Please don't fence our park!! Although not yet recognized by the Hawaii County General Plan as an area of natural beauty, this park is a real gem. It's one of the only areas that provide an expansive ocean view from Kukuihaele Road. A 6' chain link fence (and/or taller baseball backstop fence) would devalue the view and be a repulsive eye sore for this location.

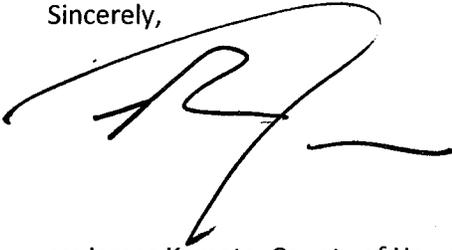
Recommendation: If the purpose of the fence is night time security to discourage homeless squatters, consider simply putting night time locks on the restrooms.

Regarding the Draft EA, I'm not in agreement with some of the findings. In particular:

- Traffic data for this study was based entirely on observations during 3 non-peak hours, which is not representative of total traffic conditions. It also doesn't properly account for increased traffic that could be generated by events that draw a high concentration of outside visitors such as little league baseball practice and games. ANY increase in traffic to this area is problematic because Kukuihaele Road is extremely narrow and without shoulder, and many areas have no safe area for pedestrians – e.g. families with children and baby strollers – to escape traffic.
- Contrary to the Draft EA, I do not find the proposed park plan to be consistent with the goals of the Hawaii County General Plan (Section 12.2). The baseball field would preclude recreational opportunity and diversity more than provide it since it dominates such a large portion of the park's available space. And the chain link fence, permanent bleachers, dugouts and backstop would all detract from the park's natural beauty.

Mahalo for your serious consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'JK' with a long horizontal stroke extending to the right.

cc: James Komata, County of Hawaii, Department of Parks and Recreation

geometrician

A S S O C I A T E S , L L C
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March 7, 2016

Ron Johnson
PO Box 1675
Honokaa, HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Johnson:

On behalf of the County of Hawai‘i, Department of Parks and Recreation (P&R), thank you for your December 6, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

1. *Your support for the paved parking, covered pavilion and restroom.* P&R takes note of your preferences.

1. *Baseball field monopolizes field and prevents your use for doing sprints, exercising dogs, having large gatherings, and other activities.* It has certainly come to the attention of P&R that there are a variety of opinions in the community about what the current needs of Kukuihaele are. Based on the calls for a ballfield, a pavilion with restrooms and an improved basketball court that have been forwarded to P&R through the last two decades, there are clearly some who believe that these facilities are needed. It is also obvious that some residents do not value these proposed facilities. The project does not have to be a zero-sum game, in which those community members who attain the facilities they have long asked for “win”, while those who want other facilities “lose.” The park is just one point in a continuing dialogue with the community that can help bring a variety of facilities in various places that satisfy the diverse needs of a changing community.

P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County’s goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the

Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete. There is a mistaken impression that it requires a minimum of 18 players, 2 coaches and an umpire to merit a ballfield, when in fact, one parent and one child spending quality time in the mutual love of a sport is a typical user group, and in the view of P&R, a worthy justification for this community facility. The ability for those in Kukuihaele to walk or drive a short distance from one's home to a home field park, where the likelihood of availability of that ballfield is more assured, is reason enough to develop this ballfield.

P&R will attempt to accommodate gatherings such as these through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park.

The ballfields in Honokaa primarily serve residents of Honokaa but also serve the surrounding areas, which is consistent with the plans for the ballfield at Kukuihaele. The youth and kupuna of Kukuihaele, as well as other nearby towns, have long had the benefit of driving to Honokaa to utilize the ballfields and other recreational amenities there. However, Honokaa residents has always been open to the wider community utilizing their recreational resources. The ballfield at Kukuihaele Park would complement the area's system of ballfields and strategically better serve the area.

2. Nobody supports having a baseball field and it would attract outside users who would clog Kukuihaele's traffic. It is important to recognize that County parks are part of a system. Although a park in a particular area may serve primarily that specific community's residents, each park in our County is meant for all its citizens as well as the visitors with whom we share our island. Just as Kukuihaele residents are able to enjoy facilities at parks in Honokaa, Waimea, Hilo, Hapuna and other parts of the island, other island residents should be able to enjoy Kukuihaele's facilities. Having facilities that are open to and mindful of the needs of all County users allows our citizenry to leverage the value of our parks.

The County needs to balance the need for additional facilities in the community with the tendency of any type of new facility to attract traffic. Although it is certain that the increased additional park use will attract more traffic, it is important to remember that this road, however narrow, once served a village with a higher population and a much more active park than what currently exists. Kukuihaele once hosted several baseball and softball teams and was a much busier town, with more motor vehicles, many of them associated with plantation traffic. All of this occurred prior to construction of the State Highway which has conducted and continues to conduct most of the traffic for the area. Based on what P&R believes will be minimal effects, the traffic situation can be monitored by P&R, DPW, the community, and the County Councilperson. If so desired, mitigation can be implemented through a reasonable combination of legislative action (e.g., lowering speed limit), roadway improvements (e.g., repaving, shoulder improvements, additional signage, speed humps, etc.) as appropriate and allowable by working through DPW, and enhanced enforcement through the Police Department.

3. Anticipate the facility being poorly maintained. P&R is confident that the proposed improvements can be properly maintained utilizing existing resources and will budget additional resources if and when found inadequate. The County is very cognizant of the importance of properly maintaining both its current inventory of recreational facilities, sites and amenities as well proposed developments. P&R

has already considered the necessary allocation of resources to properly maintain this improved park and will continue to evolve its procedures and resources to accommodate actual use and demands of this park as well as others.

4. *Open field would be nicer for tourists.* Although visitors will be welcome in the park, none of the facilities are being designed with visitors as the key user group.

5. *Don't like jogging path, which nobody wants, would rather have oval track.* The walking path is an element that has been implemented very successfully at several other recent park developments (e.g., Machado Acres park in Hilo) and in this project has received overwhelming support. The site is not large enough for an oval track and the limited demand for such warrants supports the continued existence of the oval track at nearby Honokaa Park. As an aside, the State and County are currently pursuing joint funding to enhance the track at Honokaa Park to include a rubberized surface and improved spectator seating, which, if successful, would further nullify the need to provide a second oval track in such close proximity.

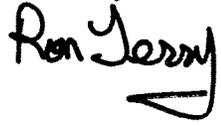
6. *Don't like chain link fence.* As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

7. *Traffic data was based on non-peak hours. Any increase in traffic is problematic.* No formal traffic assessment was conducted, and P&R does not believe one is merited based on the low existing traffic volumes that virtually all commenters have noted, as well as what the agency believes will be very minor impacts similar to those at other neighborhood parks. Please see comments above concerning monitoring and mitigation, if necessary.

8. *Plan is not consistent with General Plan.* P&R respectfully disagrees with your assessment that restoring a historic ballfield to usability violates the themes, goals, objectives and policies of the General Plan. Any park improvement has impacts and benefits, but the overall outcome will be highly consistent with the General Plan.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Jo Ann Lau Kong [mailto:joannlaukong@yahoo.com]
Sent: Tuesday, December 08, 2015 12:00 AM
To: Komata, James <James.Komata@hawaiicounty.gov>
Subject: Kukuihaele Park

We are in favor of the EA for Kukuihaele Park.

Sincerely,

Jo Ann Lau Kong 938-7325
Milton Lau Kong 775-0785

geometrician

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Joanne and Milton Lau Kong
joannelaukong@yahoo.com

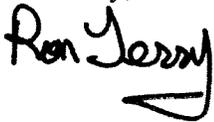
Subject: Comment to Draft Environmental Assessment on Kukuiahaele County Park Improvements

Dear Mr. and Mrs. Lau Kong:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 8, 2015 comment letter on the project, in which expressed support for the park plans and EA. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Renee Mahea <ypo4me@yahoo.com>

Subject: Re: Fwd: Kukuihaele Meeting

Date: December 7, 2015 at 3:50:44 PM HST

To: Valerie Poindexter <valeriepoindexter@mac.com>

Aloha valarie..

We the kukuihaele community would like to express our dicussion regarding the kukuihaele park plans. .we the residents of kukuihaele would like to see the project take place...But we do not want the baseball field daimond ..we have many concerns..we would like to have a playground for the children n keep it as earth friendly area for the children maybe more picnic tables n fruit trees..I Renee Lactaoen resident for 34 yrs got to speak with the beibors on their input .Here are some names I have talk to..n agree with no baseball field. .

Ted n neliAngalo..

Shelly toyko

Malia toyko

Joleen Lanning

Stella abacar

Sheneh Dela Rosa

Sherry Anderson

Tihana Lactaoen

Dave Hunt

David Dallas Allen

Collins

Jonet baptis

Ravi cambell

Nella Andrew

THANK YOU FOR YOUR TIME N LEADERSHIP ALOHA KUKUIHAELE COMMUNITY..

Sent from Yahoo Mail on Android

geometrician

ASSOCIATES, LLC
integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Renee Mahea
ypo4me@yahoo.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

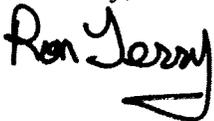
Dear Ms. Mahea:

Thank you for the comment email of December 7, 2016, to Councilperson Valerie Poindexter, which was forwarded to us, in which you expressed support for a playground, perhaps a picnic table and fruit trees, but not a baseball field. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments, which includes space for a future playground. This process has helped the project improve and better serve the community.

Regarding the baseball field, please understand that there are many groups and individuals who would like to see this historic ballfield restored. P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Malia [mailto:kainalu55@aol.com]
Sent: Monday, December 07, 2015 4:20 PM
To: Komata, James <James.Komata@hawaiicounty.gov>
Cc: Honma, Clayton <Clayton.Honma@hawaiicounty.gov>
Subject: Kukuihaele Park

I am writing in regards to the plans for Kukuihaele Park. I am NOT in favor of the current plans to add a baseball field to the park. I saw the plans and I think they are ridiculous! All we ever wanted was a playground for the kids and bathrooms. We DO NOT need a baseball field, paved parking or an ugly chain linked fence ruining our park. We do not need our neighborhood to be used for baseball games. It's a quiet community and I would like it to stay that way! This park does nothing for our community. It is not being made for our community to enjoy. Our kids will no longer have the space they currently have to run around freely and they won't even have a playground! It is so disappointing. I was raised in Kukuihaele and have lived here for over 30 years. My family has lived here for many generations. I am not a new-comer. I've heard it's the new-comers who are against the park, but that isn't true. Many of us who have lived here all or most of our lives are also against this park. If building a playground and bathrooms is not an option, please just keep it the way it is!

Thank You,
Malia Palea

Sent from my iPhone

geometrician

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Malia Palea
Kainalu55@aol.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Palea:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 7, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments, which includes space for a future children's playground, which you suggest is needed. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Do not want a baseball field.* It has certainly come to the attention of P&R that there are a variety of opinions in the community about what the current needs of Kukuihaele are. Based on the calls for a ballfield, a pavilion with restrooms and an improved basketball court that have been forwarded to P&R through the last two decades, there are clearly some who believe that these facilities are needed. It is also obvious that some residents do not value these proposed facilities. The project does not have to be a zero-sum game, in which those community members who attain the facilities they have long asked for "win", while those who want other facilities "lose." The park is just one point in a continuing dialogue with the community that can help bring a variety of facilities in various places that satisfy the diverse needs of a changing community.

P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices,

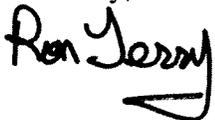
where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

2. *Do not want paved parking.* While unpaved parking can be acceptable in certain situations, unless a very robust base is constructed, it tends to degrade with heavy use and eventually becomes rutted and prone to poor drainage and mud puddles. Paved parking is more cost-efficient in these situations, and ultimately has less severe visual impacts. Because the park is constructed on a significant slope, the propensity for rain runoff to erode a parking lot constructed of gravel must be considered. Gravel requires significantly more maintenance to ensure it is compacted to minimize erosion and slipping due to unstable footing. The simple act of turning a vehicle's tires destabilizes the top layer of a gravel surface leading to potholes and erosion as well as creating a nuisance from gravel on nearby lawns and concrete walkways.

3. *Do not want a chain link fence.* As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-foot high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a small, stylized flourish or mark.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Toko, Ellaham [mailto:ellaham.toko@hawaiielectriclight.com]

Sent: Tuesday, December 08, 2015 1:04 PM

To: Komata, James <James.Komata@hawaiiicounty.gov>

Subject: Kukuihaele Park

Aloha Mr. Komata,

Just wanted to give my support for county park improvements at Kukuihaele park. I was born and raised there and frequent the park and the suggested improvements are encouraged for the community.

Mahalo nui loa,

Ellaham Toko

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Ellaham Toko
Ellaham.toko@hawaiielectriclight.com

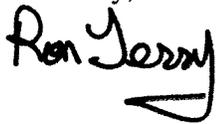
Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Toko:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 8, 2015 comment letter on the project, in which expressed support for the park plans. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: Kau'i [mailto:kahoku33@aol.com]
Sent: Tuesday, December 08, 2015 9:27 AM
To: Komata, James <James.Komata@hawaiicounty.gov>
Cc: Honma, Clayton <Clayton.Honma@hawaiicounty.gov>
Subject: Kukuihaele Park

I am writing to you concerning the plans for Kukuihaele Park. I am NOT in favor of the plans to add a baseball field, paved parking, bleachers, etc. to the park. I think it would be an eyesore to the neighborhood. Please reconsider, as a small playground for the children would be enough.

Thank You,
Kau'i Toko

Sent from my iPad

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Kau'i Toko
Kahoku33@aol.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Kau'i:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 8, 2015 comment letter on the project. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments, which includes space for a future children's playground, which you suggest is needed. This process has helped the project improve and better serve the community.

In answer to your specific comments:

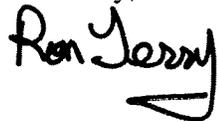
1. *Do not want a baseball field.* P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

2. *Do not want paved parking.* While unpaved parking can be acceptable in certain situations, unless a very robust base is constructed, it tends to degrade with heavy use and eventually becomes rutted and prone to poor drainage and mud puddles. Paved parking is more cost-efficient in these situations, and ultimately has less severe visual impacts. Because the park is constructed on a significant slope, the propensity for rain runoff to erode a parking lot constructed of gravel must be considered. Gravel requires significantly more maintenance to ensure it is compacted to minimize erosion and slipping due to unstable footing. The simple act of turning a vehicle's tires destabilizes the top layer of a gravel

surface leading to potholes and erosion as well as creating a nuisance from gravel on nearby lawns and concrete walkways.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090; for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, sweeping flourish at the end.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

From: naamandebbie [mailto:naamandebbie@aol.com]
Sent: Monday, December 07, 2015 3:37 PM
To: Komata, James <James.Komata@hawaiicounty.gov>
Subject: Kukuihaele park

Aloha James, We are happy with the plans for the park. This park has meaning because my husband grew up with this park and wants to see it preserved for generations. Besides using the park for weddings, funerals and lu'au it will be an important place for the residents of Waipi'o to go with their horses and animals during tsunamis.
Mahalo, Naaman and Debbie Toko

Sent from Samsung tablet

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Naaman and Debbie Toko
naamandebbie@aol.com

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

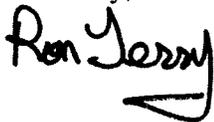
Dear Naaman and Debbie:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for your December 7, 2015 comment letter on the project, in which expressed support for the park plans. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In regard to your wish to continue the use of the park for weddings, funerals and lua'au, P&R is mindful of this need and believes it will be better accommodated by the pavilion and restroom than the current situation. For the occasional larger gathering, P&R will attempt to accommodate gatherings such as these through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: DEVA HUNT
(Name)

Date: Dec 8, 2015

48-5432 Kukuihaele Rd,
(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

I grew up in Kukuihaele community and was one of the many kids that would play at the park on a regular basis. Now my kids rarely use it because of lack of care of basketball court and painful weeds on grassy area.

2) What parts of the proposed plan do you like?

Bathrooms and pavillion that is covered

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

Use fence only on ocean side. Restore basketball court. Restore grass to field and keep it a football/soccer/volley ball field open to parties. Put pavillion and recreational facility on Honokaa side of Park.

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Deva Hunt
48-5432 Kukuihaele Road
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Hunt:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 8, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Basketball court and lawn play.* Thank you for sharing your activities. The basketball court will be upgraded as part of the proposed action.
2. *Fence.* As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help

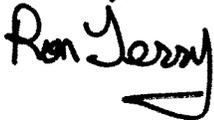
it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

3. *Pavilion should move to Honokaa side of park.* Because of the shape, size and topography of the property, the pavilion, restroom and parking lot must be located in the western part of the property. This also provides opportunities for views of the facility from the pavilion, which promotes both a pleasant park and safety for parents supervising children.

4. *No baseball field – keep as is.* P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a horizontal line that tapers to a point on the right side, resembling a stylized underline or a flourish.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: Jaime Hunt
(Name)

Date: 12/7/15

48-5432 Kukuihaele Rd
(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

I have attended a few parties there and I used to run around the field for exercise. I plan on taking my dogs down there to play once ~~my~~ they are old enough.

2) What parts of the proposed plan do you like?

I like the idea of a pavilion and restroom. I suppose the parking will be nice, and the walkways. The picnic benches sound nice.

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

I do not like the idea of building a baseball field ~~and~~ ^{and} surrounding fence. I think it will see very little useage and is a waste of money and resources. I'd much rather it remain an open field. An open field can be used for multiple sports like soccer, football, volley ball, etc. A base ball field

Please send original copy of this form to: is only baseball, and I don't ~~even~~ like baseball.

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

Note: I was born here in Kukuihaele and have lived here most of my life and plan to live here for years to come. I do not wish to lose the park to baseball.

IMPORTANT: DEADLINE TO SUBMIT IS **DECEMBER 8, 2015** POSTMARK

geometrician

ASSOCIATES, LLC
integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Jaime Hunt
48-5432 Kukuihaele Road
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Hunt:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 7, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Activities you engage in and support.* Thank you for sharing your activities, and your support for the pavilion, restroom, parking and benches.
2. *Fence.* As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-foot high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every

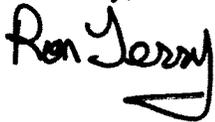
function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

3. *Leave basketball court as-is.* Please see the attached letter for information about slight relocation of basketball court. Many residents have expressed a desire to see it improved.

4. *No baseball field – keep as is.* P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a small, stylized flourish or underline.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: Kristan Hunt
(Name)

Date: Dec 6, 2015

48-5432 Kukuihaele Road
(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

I have lived in Kukuihaele for 37 years. I raised 3 sons and now have 2 sons and 2 grandsons here living in Kukuihaele. We enjoy the park for soccer, kite flying, frisbee, running around, birthday parties.

2) What parts of the proposed plan do you like?

I think we need a covered pavillion & bathrooms. The park does NOT need a baseball field. We have 2 in Honokaa.

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

No fences
leave basketball court as is
Just a nice pavillion & nice bathrooms

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

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ASSOCIATES, LLC
integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Kristan Hunt
48-5432 Kukuihaele Road
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Hunt:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 6, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

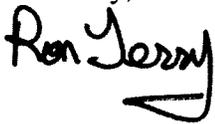
1. *Activities you engage in and support.* Thank you for sharing your activities, and your support for the pavilion and restroom.
2. *Fence.* As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help

it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

3. *No baseball field – keep as is – as you do not even like baseball.* It has certainly come to the attention of P&R that there are a variety of opinions in the community about what the current needs of Kukuihaele are. Based on the calls for a ballfield, a pavilion with restrooms and an improved basketball court that have been forwarded to P&R through the last two decades, there are clearly some who believe that these facilities are needed. It is also obvious that some residents do not value these proposed facilities. The project does not have to be a zero-sum game, in which those community members who attain the facilities they have long asked for “win”, while those who want other facilities “lose.” The park is just one point in a continuing dialogue with the community that can help bring a variety of facilities in various places that satisfy the diverse needs of a changing community. P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County’s goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

P.S. a 2 business day interval to respond is draconian
Sure hope it was not intentional.

COMMENT FORM to be filled out and mailed to addresses below.

From: Eileen Levin
(Name)

Date: 12/6/15

4B-5484 kukuihaele Rd.
4B-5452 Honokaa, HI
(Address)

If you must fence it,
fence only the perimeter
do not diminish sq ft
of usable area.

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

throw ball, run pets, baby luau's, weddings, ~~birth~~ birthda
partie, other large parties

2) What parts of the proposed plan do you like? VERY LITTLE!

I have NEVER seen a little league or a SINGLE baseball
game there. NEVER, not even soccer. no organized sports
or kids to play them exist in village.

3) What parts of the proposed plan need to be improved (such as change or remove fence,
relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility,
etc.)?

make "improvements" but do not change current
pattern of use. JUST ADD pavilion + bathrooms,
maybe fence, allow cars access to grass for large
party functions. It is used ALOT for functions " " " "

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

Why spend all
that money when
we DO NOT have
baseball or soccer.

There are not any
children in village to
play either game,

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

SCHLEMBESSERING. a German word that
means: an improvement that makes things
WORSE! — Don't do it!

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integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Eileen Levin
48-5484 Kukuihaele Road
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Levin:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 6, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

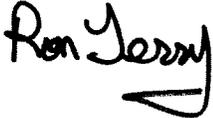
1. *Activities you engage in and support for pavilion and restroom.* Thank you for sharing your activities and your comments on the features you support.
2. *Fence.* We note your comment about a possible perimeter fence. As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use,

this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

3. *No baseball field – keep as is.* P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a small, stylized flourish or underline.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: Mason Dshiro
(Name)

Date: 12.7.15

Po Box 5088
(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

Recreation and large parties

2) What parts of the proposed plan do you like?

The chain-link fence is a great idea BUT with access of vehicles entering the lower park area for parties. Vehicles entering should only be the person in charge of party

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

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integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Mason Oshiro
PO Box 5088
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Oshiro:

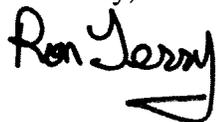
On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 7, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Activities you engage in and support for fence, with condition that vehicles certain vehicles can enter onto lower area.* Thank you for sharing your activities and your comments on the features you support. P&R will attempt to accommodate gatherings such as these through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park. Concerning the vehicles, they tend to severely damage ballfield surfaces and P&R intends to minimize vehicular intrusion.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: Lorraine Penfield
(Name)

Date: 12/3/15

P.O. Box 1420 KAMUELA HI 96743
(Address)

(I live at the overlook)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

I enjoy on my daily walk the beauty of the rolling grass field. wonderful large parties with tents & music have been part of my experience. I also like to fly my kite again in the open field.

2) What parts of the proposed plan do you like?

Maybe a pavilion would allow for community neighborhood gatherings with a small restroom. Honestly, I think it is superb in its present state. This offers low income (at times) family to have parties in a one of a kind 'beautiful' location.

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)? I would remove the fence & never have a ball park that would be expensive to maintain & selfishly absorb the land. I would have the parking lot adjacent to the seldom used basketball court for parking overflow. Let the pavilion have an expansive view of the ocean. Allow for unstructured play in the lawn. HONOKAA is best for organized team & league sports. Why add traffic to a special quiet village.

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

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integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Lorraine Penfield
PO Box 1420
Kamuela HI 96743

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Ms. Penfield:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 3, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Activities you engage in and support for pavilion and small restroom.* Thank you for sharing your activities and your comments on the features you support.
2. *Fence.* We note your comment about a possible perimeter fence. As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-foot high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park,

which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

3. *No baseball field – keep as is.* P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

4. *Organized team activities should only be in Honokaa.* It has certainly come to the attention of P&R that there are a variety of opinions in the community about what the current needs of Kukuihaele are. Based on the calls for a ballfield, a pavilion with restrooms and an improved basketball court that have been forwarded to P&R through the last two decades, there are clearly some who believe that these facilities are needed. It is also obvious that some residents do not value these proposed facilities. The project does not have to be a zero-sum game, in which those community members who attain the facilities they have long asked for "win", while those who want other facilities "lose." The park is just one point in a continuing dialogue with the community that can help bring a variety of facilities in various places that satisfy the diverse needs of a changing community. At the same time, it is important to recognize that County parks are part of a system. Although a park in a particular area may serve primarily that specific community's residents, each park in our County is meant for all its citizens as well as the visitors with whom we share our island. Just as Kukuihaele residents are able to enjoy facilities at parks in Honokaa, Waimea, Hilo, Hapuna and other parts of the island, other island residents should be able to enjoy Kukuihaele's facilities. Having facilities that are open to and mindful of the needs of all County users allows our citizenry to leverage the value of our parks. Please bear in mind that the lower area was created as a ballfield in the 1950s and used as such for many decades. As discussed above, there is insufficient active recreation space, particularly ballfields.

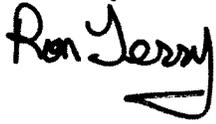
5. *Traffic.* The County needs to balance the need for additional facilities in the community with the tendency of any type of new facility to attract traffic. Although it is certain that the increased additional park use will attract more traffic, it is important to remember that this road, however narrow, once served a village with a higher population and a much more active park than what currently exists. Kukuihaele once hosted several baseball and softball teams and was a much busier town, with more motor vehicles, many of them associated with plantation traffic. All of this occurred prior to construction of the State Highway which has conducted and continues to conduct most of the traffic for the area. Based on what P&R believes will be minimal effects, the traffic situation can be monitored by P&R, DPW, the community, and the County Councilperson. If so desired, mitigation can be implemented through a reasonable combination of legislative action (e.g., lowering speed limit), roadway improvements (e.g., repaving, shoulder improvements, additional signage, speed humps, etc.)

as appropriate and allowable by working through DPW, and enhanced enforcement through the Police Department.

The park is primarily intended to accommodate the needs of the community (Kukuihaele and surrounding areas) and not as an alternative rest stop for Waipi'o Valley visitors. However, it is a public park and the amenities there will be available to everyone as is the situation with all public parks island-wide. P&R has implemented certain design elements to dissuade large passenger vehicles from using the park solely as a rest stop for its riders. It is also expected that solutions to the restroom situation at the Waipi'o Valley Lookout will be developed in the near future, reducing this as even a minor area of concern.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, sweeping initial "R" and a distinct "T" at the end.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: John + Annazette Reed
(Name)

Date: 12/7/15

48-55291A Waipio Lookout Rd.
(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

Large Parties and the open park area

2) What parts of the proposed plan do you like?

Pavilion, Bathrooms

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

Keep Lower level as is, to much expense for baseball field and Not many Kids Kukuiaele, honokaa got complex - Need access to lower field for Parties. No fencing. Old People can not walk the hill need to park in park like the last 100 years.

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

geometrician

A S S O C I A T E S , L L C

integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

John and Annazette Reed
48-5529A
Waipio Lookout Road

Subject: Comment to Draft Environmental Assessment on Kukuiahaele County Park Improvements

Dear Mr. and Mrs. Reed:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 7, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

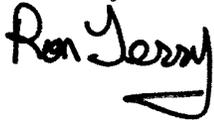
In answer to your specific comments:

1. *Activities you engage in and support for pavilion and small restroom.* Thank you for sharing your activities and your comments on the features you support.
2. *Large parties and open park.* P&R will attempt to accommodate gatherings such as these through a permit system, as it does at least every weekend for other parks in the County system. Although the space available may be reduced from what was formerly available, the addition of a pavilion with restrooms will improve the general experience at the park. As for the elderly or disabled accessing the lower level of the park, it has been designed with ADA parking, stairs and ramps, including handrails, to connect the various spaces.
3. *Fence.* We note your comment about a possible perimeter fence. As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuiahaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-foot high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations

(existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use, this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a horizontal line that tapers to a point on the right side, serving as a decorative flourish or underline.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: BRUCE M. SHULAK Date: DEC. 1, 2015
(Name)

48-5528 WAIPIO VALLEY RD, HONOLULU, HI,
(Address) 96727
(808) 775-1816

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

BASKETBALL, PICNICS

2) What parts of the proposed plan do you like?

EVERYTHING EXCEPT THE FENCE

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

NO FENCES ~~ES~~ - FREE + OPEN
ACCESS TO PARK IS ESSENTIAL!

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

Bruce Shulak

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Bruce M. Shulak
48-5528 Waipio Valley Road
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Shulak:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 1, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

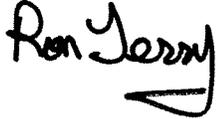
1. *Activities you engage in and support for pavilion and small restroom.* Thank you for sharing your activities and your comment that you like everything but the fence.

2. *Fence.* We note your comment about a possible perimeter fence. As discussed in the attached letter, the Site Plan has been modified to accommodate concerns about the visual impact of the fence. The proposed six-foot high park perimeter chain link fence along Kukuihaele Road is being eliminated and landscape features (e.g., shrubs, boulders, grading, etc.) will be strategically placed to prevent unauthorized entry of vehicles. The proposed six-foot high park perimeter chain link fence was reduced to 4-feet high at the north and east boundaries of the park, while the 6-foot high fence along the Waipi'o/west side of the park (nearest the adjacent houses) will remain. While it is understood that some community members object to fencing the park's makai and Honokaa-side-boundary, P&R has determined that some of that fencing is required for safety because of immediate changes in elevations (existing and proposed) and because securing access to/from adjoining properties through the park is important to address. Fencing also provides an increased level of safety for children in defining hard limits to where they can wander, which discourages them from easily accessing the gravel driveway surrounding those sides of the park that could put them in harm's way. Also, the fence is meant to discourage park users from using the adjacent private gravel driveway in conjunction with the park, which sometimes occurs. Despite that landowner's offer that he may not necessarily oppose this use,

this consent cannot be assumed to be in place for all park users for every function that occur there, for now and in perpetuity. Also, the fence will be painted dark green to help it blend in better with the existing natural color palette and allow it to disappear into the foreground, thus enhancing the background vistas.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a horizontal flourish that tapers to a point on the right side.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: Daniel Warner
(Name)

Date: 12/7/2015

485269 Kukuihaele Rd. Hanalei, HI 96727
(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

I enjoy just walking around and having picnics.

2) What parts of the proposed plan do you like?

I hope there will be a proper restroom (instead of a Port-a-Potty) and a pavilion.

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

I would like to see most of the park kept as it is now, except for a new restroom and pavilion. I would rather not have a ball park.

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

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phone: (808) 969-7090 PO Box 396 Hilo Hawaii 96721 rterry@hawaii.rr.com

March 7, 2016

Daniel Warner
48-2569 Kukuihaele Road
Honokaa HI 96727

Subject: Comment to Draft Environmental Assessment on Kukuihaele County Park Improvements

Dear Mr. Warner:

On behalf of the County of Hawai'i, Department of Parks and Recreation (P&R), thank you for the input you provided expressing your preferences for the park and your opinion concerning the features that P&R has proposed in the filled out form dated December 7, 2015. P&R appreciates the input it has been receiving on the project – whether pro, con or simply requesting some changes. The attached letter outlines the design changes that were implemented in response to the comments. This process has helped the project improve and better serve the community.

In answer to your specific comments:

1. *Activities you engage in and support for pavilion and small restroom.* Thank you for sharing your activities and your comment that you support the restroom and pavilion.

2. *No ballpark.* It has certainly come to the attention of P&R that there are a variety of opinions in the community about what the current needs of Kukuihaele are. Based on the calls for a ballfield, a pavilion with restrooms and an improved basketball court that have been forwarded to P&R through the last two decades, there are clearly some who believe that these facilities are needed. It is also obvious that some residents do not value these proposed facilities. The project does not have to be a zero-sum game, in which those community members who attain the facilities they have long asked for “win”, while those who want other facilities “lose.” The park is just one point in a continuing dialogue with the community that can help bring a variety of facilities in various places that satisfy the diverse needs of a changing community. P&R has ballfields around the County, nearly all of which experience a high demand for use for Little League and various softball leagues, particularly kupuna softball. It is the County's goal to provide for the recreational needs of all the population, but particularly for youth and the elderly. Many kupuna softball teams lack their own home fields and are forced to share facilities, which can create difficulties for practices and league games. This is exacerbated during times when fields have to be shut down for repair or maintenance. A restored field at Kukuihaele, which has a storied history reflecting the plantation heritage, will be a valuable addition to the inventory of

ballfield facilities and an asset to the Kukuihaele and Hamakua community. In addition to having the option to conduct regulation baseball and softball games, the field would be available for organized practices as well as informal practices, where a parent could hit grounders and fly balls to his/her child, practice hitting, pitching, fielding, and the other fundamental skills critical to developing a young athlete.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090: for questions concerning the project, please contact James Komata at 961-8311.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a small, stylized flourish or mark.

Ron Terry, Principal
Geometrician Associates

Cc: James Komata, P&R; Austen Drake, SSFM Int'l

COMMENT FORM to be filled out and mailed to addresses below.

From: ANONYMOUS
(Name)

Date: 12/8/15

(Address)

RE: KUKUIHAELE PARK IMPROVEMENTS

1) What activities do you currently enjoy at the park, such as recreation or large parties?

*TAKING DAILY WALKS AND VARIOUS COMMUNITY PARTIES
I ENJOY THE PEACEFULNESS AND BEAUTIFUL VIEWS
FROM THE PARK.*

2) What parts of the proposed plan do you like?

*NONE BECAUSE MY RIGHT TO EXPRESS MY OPINION
OF EA AND PLANS WAS DENIED WITHOUT PROPER NOTICE.*

3) What parts of the proposed plan need to be improved (such as change or remove fence, relocate pavilion, leave lower level of park as-is, replace ball park with other recreational facility, etc.)?

*LEAVE THE ENTIRE PARK AS IS WITH ONLY A FEW NEEDED
CHANGES SUCH AS REST ROOMS, SWINGS + SLIDES FOR KIDS, DRINKING
FOUNTAIN. KEEP IT SIMPLE. SEE ATTACHED COMMENTS.*

Please send original copy of this form to:

Ron Terry
Geometrician Associates LLC
P.O. Box 396
Hilo, HI 96721

If possible, send copy to:

James Komata
Dept. of Parks and Recreation - County of Hawaii
101 Pauahi St., Suite 6
Hilo, HI 96720

IMPORTANT: DEADLINE TO SUBMIT IS DECEMBER 8, 2015 POSTMARK

my comments regarding: "Kukuihaele Park Improvements"

I have been a Honoka'a resident most of my life. After having attended school on the Mainland for a few years, I learned how wonderful Kukuihaele is compared to the places I saw over there.

Since my heart is in Kukuihaele, I want only the best for this very special place. The peaceful way of life here is almost as perfect as anyone can expect. When I heard about plans for an engineered little league baseball field, my appreciation for what we already have was made all the more strong.

Luckily, I saw a copy of plans for these "park improvements" which a neighbor showed me. Why were these plans not freely given to all interested parties? Since the baseball field takes up most of the park, I see the plans do not allow enough room for baby luau celebrations and other large parties which are so important to our community.

A few needed improvements to our park would be
~~by~~ wonderful such as swings + slides for the
kids as well as restrooms and a drinking
fountain. Keep it simple.

Because DLNR is apparently not acting in
the best interests of the people, these comments
must remain anonymous at this time. Thank
you for your attention.

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Kukuihaele Park Improvements

Environmental Assessment

APPENDIX 2

Archaeological Assessment Survey

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An Archaeological Assessment Survey Conducted for Proposed Improvements to the County of Hawai'i's Kukuihaele Park

TMK: (3) 4-8-006:010

Kanahonua Ahupua'a
Hāmākua District
Island of Hawai'i

DRAFT VERSION



Prepared By:

Teresa Gotay, M.A.,
Matthew R. Clark, B.A.
and
Robert B. Rechtman, Ph.D.

Prepared For:

Austen Drake, P.E.
SSFM International, Inc.
99 Aupuni Street
Hilo, HI 96720

October 2015

ASM Project Number 25260.00



Archaeology • History • Ethnography • Architectural History

Office: (808) 969-6066 • Fax: (808) 443-0065

An Archaeological Assessment Survey Conducted for Proposed Improvements to the County of Hawai‘i’s Kukuihaele Park

TMK: (3) 4-8-006:010

Kanahonua Ahupua‘a
Hāmākua District
Island of Hawai‘i



EXECUTIVE SUMMARY

At the request of Austen Drake of SSFM International, Inc., ASM Affiliates conducted an Archaeological Assessment survey for proposed improvements to the roughly 4-acre Kukuihaele Park (TMK: (3) 4-8-006:010) located in Kanahonua Ahupua‘a, Hāmākua District, Island of Hawai‘i. The County of Hawai‘i intends to improve the existing park facilities by adding a parking lot, a pavilion, a comfort station, walking paths, and by updating the existing basketball court and baseball field. This action requires the production of an Environmental Assessment (EA) in compliance with HRS Chapter 343. The current study, which was conducted in support of the EA and will accompany the final draft of that document, was undertaken in accordance with Hawai‘i Administrative Rules 13§13-275, and was performed in compliance with the Rules Governing Minimal Standards for Archaeological Inventory Surveys and Reports as contained in Hawai‘i Administrative Rules 13§13-276. This report provides a study area description, a detailed culture-historical background, a discussion of prior archaeological studies within the vicinity of the current study area, and the results of the field investigation of the current study area.

As a result of the current survey there were no archaeological resources identified of any kind within the current study area. Thus, it is our conclusion that the proposed improvements to Kukuihaele Park will not affect any historic properties. According to 13§13-275-5(b)(5)(A) when no archaeological resources are discovered during an archaeological survey the production of an Archaeological Assessment report is appropriate. Compliance with the above standards is sufficient for meeting the historic preservation review process requirements of both the Department of Land and Natural Resources–State Historic Preservation Division (DLNR–SHPD) and the County of Hawai‘i Planning Department. With respect to the historic preservation review process of both the DLNR–SHPD and the County of Hawai‘i Planning Department, our recommendation is that no further work needs to be conducted prior to or during project implementation. In the unlikely event that significant archaeological resources are discovered during the implementation of the proposed park improvement project, work should cease in the area of the discovery and DLNR-SHPD contacted pursuant to HAR 13§13-280-3.

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1. INTRODUCTION

At the request of Austen Drake of SSFM International, Inc., ASM Affiliates conducted an Archaeological Assessment survey for proposed improvements to the roughly 4-acre Kukuihaele Park (TMK: (3) 4-8-006:010) located in Kanahonua Ahupua‘a, Hāmākua District, Island of Hawai‘i (Figures 1 and 2). The County of Hawai‘i intends to improve the existing park facilities by adding a parking lot, a pavilion, a comfort station, walking paths, and by updating the existing basketball court and baseball field (Figure 3). This action requires the production of an Environmental Assessment (EA) in compliance with HRS Chapter 343. As described in the draft EA, the improvements to Kukuihaele Park will benefit most area residents, who have repeatedly requested for county officials to provide active recreational facilities. In addition, the proposed improvements will render all of the buildings and amenities accessible to persons with disabilities, which has side benefits to families with small children in strollers, temporarily disabled (injured) persons, and others. The improvements are being funded by Ordinance No. 15-58, which was passed unanimously by the Hawai‘i County Council on June 2, 2015. The funding request was initiated by Councilmember Valerie Poindexter in response to calls from constituents.

The current study, which was conducted in support of the EA and will accompany the final draft of that document, was undertaken in accordance with Hawai‘i Administrative Rules 13§13–275, and was performed in compliance with the Rules Governing Minimal Standards for Archaeological Inventory Surveys and Reports as contained in Hawai‘i Administrative Rules 13§13–276. According to 13§13-275-5(b)(5)(A) when no archaeological resources are discovered during an archaeological survey the production of an Archaeological Assessment report is appropriate. Compliance with the above standards is sufficient for meeting the historic preservation review process requirements of both the Department of Land and Natural Resources–State Historic Preservation Division (DLNR–SHPD) and the County of Hawai‘i Planning Department. This report provides a study area description, a detailed culture-historical background, a discussion of prior archaeological studies within the vicinity of the current study area, and the results of the field investigation of the current study area.

STUDY AREA DESCRIPTION

The current study area (Figure 4) consists of an existing County of Hawai‘i Park facility located in the community of Kukuihaele, Kanahonua Ahupua‘a, Hāmākua District, Island of Hawai‘i at an elevation of roughly 700 feet above sea level (see Figures 1). The 4.026 acre park parcel (TMK: (3) 4-8-006:010; see Figure 2) includes a basketball court and ball field, a few picnic benches, and several portable toilets (Figure 5). It is bounded to the south by Kukuihaele Road (Figure 6), to the west by privately owned residential properties, and to the north and east by a private driveway easement (Figure 7). The entire surface of the study area has been previously graded, banked, and leveled to form the existing park facility. The natural slope along the southern and western edges of the existing ball field was cut and pushed to create the level playing surface (Figure 8), creating an artificial slope along the northern and eastern edges that has been armored along a portion of the northern edge with rock material to prevent erosion. The location of the existing basketball court was similarly cut and filled before pouring the concrete playing surface (Figure 9). The area *mauka* of the basketball court was formerly the location of a wooden structure that was demolished and removed from the property during the early 2000s. A push pile of rock debris is all that remains in the general vicinity of this former structure (Figure 10). A gravel driveway leads from Kukuihaele Road to the basketball court (Figure 11), where it has been blocked with boulders to prevent people from driving onto the ball field. Vegetation within the park area consists primarily of mowed grass, with trees and ornamentals planted along the boundaries, and some overgrown areas on the steep slopes that are not maintained by the Department of Parks and Recreation.

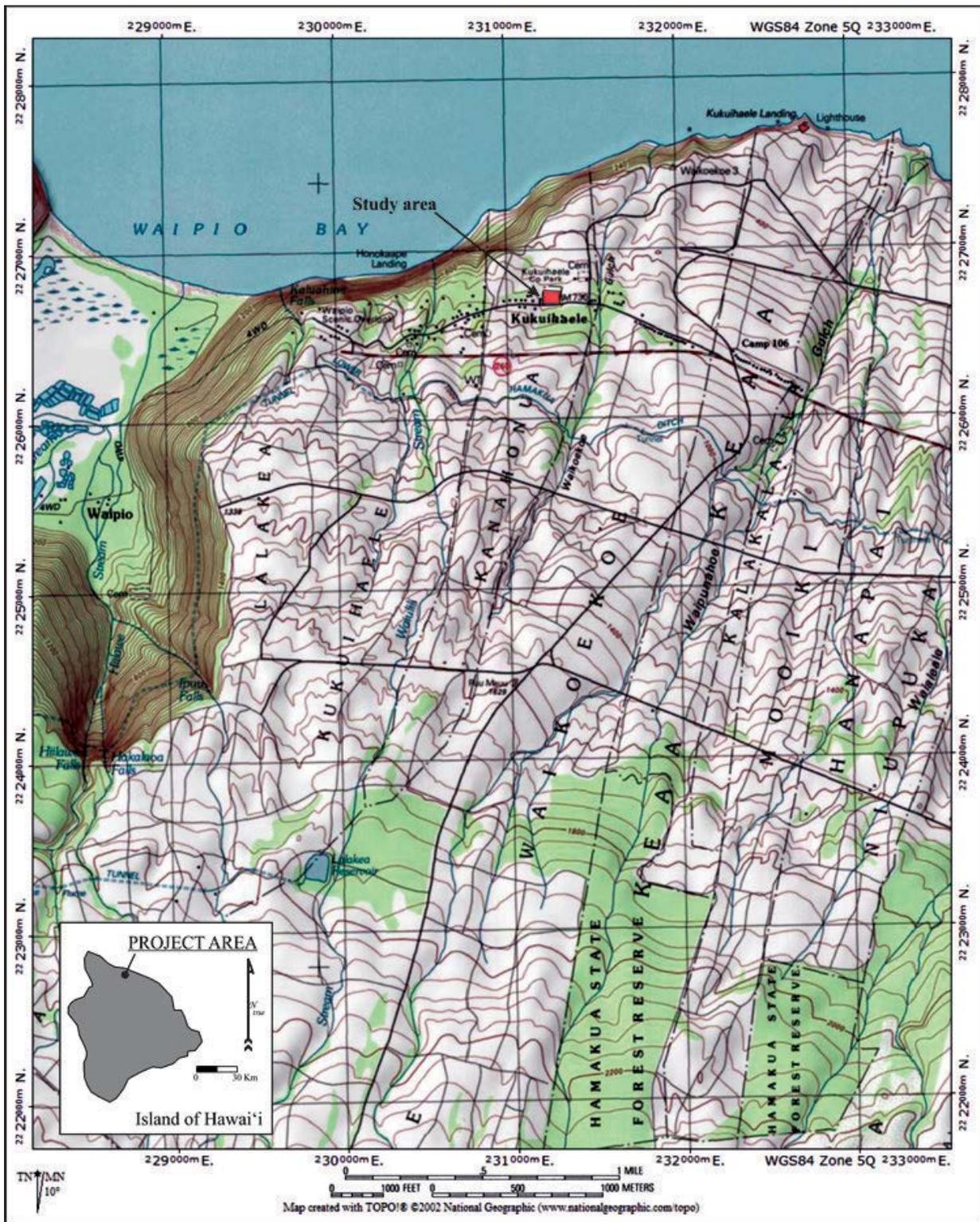


Figure 1. Project area location.



Figure 4. 2013 Google Earth image showing the current study area.



Figure 5. Kukuihaele Park ball field, view to the southeast.



Figure 6. Kukuiahae Road along the southern boundary of the park, view to east.



Figure 7. Driveway easement along the northern boundary of the park parcel, view to the west.



Figure 8. Kukuiahae Park ball field, view to the southwest.



Figure 9. Kukuiahae Park basketball court, view to the northwest.



Figure 10. Location of the former wooden structure, view to the south.



Figure 11. Kukuihaele Park driveway, view to the north.

2. BACKGROUND

To generate a set of expectations regarding the nature of cultural resources that might be encountered within the study area, and to establish an environment within which to assess the significance of any such resources, a brief culture-historical background is presented. This section of the report includes a synthesis of prior archaeological and historical research relevant to the current study area.

CULTURE-HISTORICAL CONTEXT

In an effort to provide a comprehensive and holistic understanding of the current study area and to inform expectations for the current study, a culture-historical context will be presented. The focus of the discussion begins with the general settlement pattern for the Hawaiian Islands, and then shifts to archival and historical data relevant to Hāmākua District and more specifically Kanahonua Ahupua‘a, and the Kukuihaele Park parcel.

A Brief Overview of Hawaiian Settlement

The conventional wisdom has been that first inhabitants of Hawai‘i Island probably arrived by at least A.D. 300, and focused habitation and subsistence activity on the windward side of the island (Burtchard 1995; Kirch 1985; Hommon 1986). However, there is no archaeological evidence for occupation of Hawai‘i Island (or perhaps anywhere in Hawai‘i) during this initial settlement, or colonization stage of island occupation (A.D. 300 to 600). More recently, Kirch (2011) has convincingly argued that Polynesians may not have arrived to the Hawaiian Islands until at least A.D. 1000, but expanded rapidly thereafter. The implications of this on the currently accepted chronology (Kirch 1985) would alter the timing of the Settlement, Developmental, and Expansion Periods, possibly shifting the Settlement Period to A.D. 1000 to 1100, the Developmental Period to A.D. 1100 to 1350, and the Expansion Period to A.D. 1350 to 1650.

The initial settlement in Hawai‘i is believed to have occurred from the southern Marquesas Islands. This was a period of great exploitation and environmental modification, when early Hawaiian farmers developed new subsistence strategies by adapting their familiar patterns and traditional tools to their new environment (Kirch 1985; Pogue 1978). Their ancient and ingrained philosophy of life tied them to their environment and kept order. Order was further assured by the conical clan principle of genealogical seniority (Kirch 1984). According to Fornander (1969), the Hawaiians brought from their homeland certain universal Polynesian customs: the major gods Kāne, Kū, and Lono; the *kapu* system of law and order; cities of refuge; the ‘*aumakua*’ concept; various epiphenomenal beliefs; and the concept of *mana*. Initial permanent settlements in the islands were established along the better watered windward shores of the islands, at sheltered bays with access to fresh water and marine resources. These conditions characterized the lands of Waipi‘o, near the current study area in Hāmākua, where clusters of fishermen and their families would settle along the small bays (Handy and Handy 1972). Communities shared extended familial relations and there was an occupational focus on the collection of marine resources. Over a period of several centuries the areas with the richest natural resources became populated and perhaps even crowded, and there was an increasing separation of the chiefly class from the commoners. As the environment reached its maximum carrying capacity, the result was social stress, hostility, and war between neighboring groups (Kirch 1985). Soon, large areas of Hawai‘i were controlled by a few powerful chiefs.

The Development Period brought about a uniquely Hawaiian culture. The portable artifacts found in archaeological sites of this period reflect not only an evolution of the traditional tools, but some distinctly Hawaiian inventions. The adze (*ko‘i*) evolved from the typical Polynesian variations of plano-convex, trapezoidal, and reverse-triangular cross-section to a very standard Hawaiian rectangular quadrangular tanged adze. A few areas in Hawai‘i produced quality basalt for adze production. Mauna Kea on the island of Hawai‘i in the Hāmākua District was a well-known adze quarry. The two-piece fishhook and the octopus-lure breadloaf sinker are Hawaiian inventions of this period, as are ‘*ulu maika*’ stones and *lei niho palaoa*. The later was a status item worn by those of high rank, indicating a trend toward greater status differentiation (Kirch 1985).

The Expansion Period is characterized by the greatest social stratification, major socioeconomic changes, and intensive land modification. Most of the ecologically favorable zones of the windward and coastal regions of all major islands were settled and the more marginal leeward areas were being developed. The greatest population growth occurred during the Expansion Period. Subsistence patterns intensified as crop farming evolved into large irrigated field systems and expanded into the marginal dry land areas. The *loko* or fishpond aquaculture flourished during this period (Bellwood 1978; Kirch 1985). According to Handy and Handy (1972), nearby Waipi‘o Valley was host to one of the largest planting areas in the Hawaiian Islands and the largest wet-taro valley on the Island of Hawai‘i, replete with agricultural terraces.

During the Expansion Period, the island of Hawaii was divided into six major districts, including Hāmākua, where the current study area is located. The concept of the *ahupua'a* was also established around this time ca. the A.D. 1400s (Kirch 1985), adding another component to a then well-stratified society. This land unit became the equivalent of a local community, with its own social, economic, and political significance. *Ahupua'a* (such as Kanahouua) were usually wedge or pie-shaped, incorporating all of the eco-zones from the mountains to the sea and for several hundred yards beyond the shore, assuring a diverse subsistence resource base (Hommon 1986). *Ahupua'a* were ruled by *ali'i 'ai ahupua'a* or lesser chiefs; who, for the most part, had complete autonomy over this generally economically self-supporting piece of land, which was managed by a *konohiki*. The *ali'i-'ai-ahupua'a* in turn answered to an *ali'i 'ai moku* (chief who claimed the abundance of the entire district). Thus, *ahupua'a* resources supported not only the *maka'āinana* and *'ohana* who lived on the land, but also contributed to the support of the royal community of regional and/or island kingdoms. This form of district subdividing was integral to Hawaiian life and was the product of strictly adhered to resources management planning. Also, in communities with long-term royal residents, divisions of labor (with specialists in various occupations on land and in procurement of marine resources) came to be strictly adhered to.

The *ali'i* and the *maka'āinana* (commoners) were not confined to the boundaries of the *ahupua'a*; when there was a perceived need, they also shared with their neighbor *ahupua'a ohana* (Hono-ko-hau 1974). The *ahupua'a* were further divided into smaller sections such as the *'ili, mo'o'aina, pauku'aina, kihapai, koele, hakuone, and kuakua* (Hommon 1986, Pogue 1978). The chiefs of these land units gave their allegiance to a territorial chief or *mo'i* (king). *Heiau* building flourished during the Expansion Period as religion became more complex and embedded in a sociopolitical climate of territorial competition. Monumental architecture, such as *heiau*, “played a key role as visual markers of chiefly dominance” (Kirch 1990:206). Nearby Waipi'o was the residential base for powerful local rulers dating back to at least the A.D. 1200s (Cartwright 1933), and appears to have been the ruling center for the Pili line, which initially ruled from Kohala. Cartwright (1933) suggests that Pili later resided in and ruled from Waipi'o Valley in the Hāmākua District. Ethnohistorical traditions (Fornander 1880) indicate that Waipi'o Valley was associated with at least nine successive Pili line rulers of Hawai'i Island, from Kaha'imoele'a to 'Umi (ca. A.D. 1460 to 1620). A number of large *heiau* were maintained in Waipi'o Valley throughout the Precontact Period (Cordy 1994), which is a testament to Waipi'o's enduring significance as a religious and royal center. According to Franklin et al. (1994) one can also assume that a percentage of the resources produced by the residents of Kanahouua were used to support the chiefly community at Waipi'o. In particular, residents of the areas along the *kula* slopes marked by steep cliffs, found to the north of the current study area, likely depended on their neighbors who had easier access to marine resources.

Legendary Accounts

Although no legendary references were found that specifically mention the subject *Ahupua'a* of Kanahouua, the greater Hāmākua District and nearby Waipi'o Valley feature prominently in various myths, legends, *'ole*, and *mele*. A selection of these legendary accounts is presented below.

The wet and misty lands of Hāmākua extend from the windward slopes of Mauna Kea to the sea and comprise a unique environment influenced the determination of its boundaries and shaped its history. According to the legend *Ka'ao Ho'oniua Pu'uwai no Ka-Miki* (The Heart Stirring Story of Ka-Miki) published in Hawaiian language newspapers in the early 1900s and translated by Kepa Maly (1994), the mists that hang over Hāmākua originated when Ka-Miki's ancestress used her physical form known as “*Ka-'ohu-kolo-mai-iluna-o-ka-lā'au* (the mist which creeps across the forest)” to hide Ka-miki from the ghost hordes who were trying to trap him in their nets. This legend also provides a valuable reference to the practice of bird hunting using nets, which was a common resource acquisition strategy used in the Hāmākua area as well. Elsewhere, a traditional chant or *'ole* refers to the practice of netting birds in the forests of Hāmākua. Other relevant legendary accounts depict the ancient foot trails that crossed the *ahupua'a* of Hāmākua, most of which were described as steep and difficult to traverse.

Many of the place names throughout the Hawaiian Islands have traditional legends associated with them and most of the place names reveal a deeper meaning. For instance, the Kukuihaele *Ahupua'a*, whose literal translation is traveling torch, was named after Kukui-a-haele-ana, the ninth *'ōlohe* champion of the Pili line who was defeated by Ka-Miki (Maly 1994). Unfortunately, the lands of Kanahouua are not explicitly referenced in the legends and no literal translation for the place name is provided by Pukui et al. (1974). However, Kēpa Maly provides the following interpretative translation:

If written as 'Kana-honua' (earth support), the name is perhaps descriptive of a land that stretches out horizontally supporting cloud masses; an appropriate description of this area when seen from further south in Hāmākua. (1994: B-1)

Numerous legends that emerged from the Hāmākua District feature Lono, a Hawaiian god associated with abundant growth and agriculture, which comes as no surprise given the emphasis on agriculture in the region. Furthermore, according to Handy and Handy (1972) a mythical creature known as Kamapua‘a (the hog god) was the embodiment of Lono and that,

On Hawaii his domain was the verdant rainy Hamakua coast, where, when southerly winds sweep around the eastern flank of Mauna Kea, the storm clouds pile up in roiling masses like giant swine rutting in the uplands. (ibid.:341)

Post-Contact Accounts of Kanahonua and Hāmākua (1793-1848)

The writings of early visitors (explorers and missionaries) to Hawai‘i provide important glimpses into the nature of native communities and their history as spoken at the time, as well as descriptions of the environment, land use and traditional cultural practices. Narratives recorded by early visitors to the Hāmākua region with specific references to the nearby coastal valleys are provided below. The themes common to most of the narratives of the foreign visitors include descriptions of a lush and fertile land dotted with intermittent waterfalls and scattered settlements.

In 1793-1794 Archibald Menzies, a naturalist and surgeon with Captain George Vancouver’s expedition aboard *Discovery*, wrote the following description of the Hāmākua District coast in 1793 as seen from his ship:

. . . The land we passed in the forenoon rose in a steep bank from the water side and from thence the country stretched back with an easy acclivity for about four or five miles, and was laid out into little fields, apparently well cultivated and interspersed with the habitations of the natives. Beyond this the country became steeply rugged and woody, forming mountains of great elevation.

A little after noon, we passed a very romantic part of the shore formed into ridges not unlike the roofs of houses, with their ends facing the sea in dark perpendicular cliffs of considerable height. These were intersected with deep gulleys [sic] from which a number of beautiful cataracts emptied their foaming streams into the ocean. This part of the shore is too dreary and rugged to be much inhabited. It is not above two leagues to the eastward of the northwest point of the island. . . (Menzies 1920:51-52)

Less than a year after Kamehameha’s death in 1819, Protestant missionaries arrived from America. In 1823, British missionary William Ellis and members of the American Board of Commissioners for Foreign Missions (ABCFM) toured the island of Hawai‘i seeking out communities in which to establish church centers and schools. In an entry recording their journey from Hilo to Hāmākua, Ellis described the terrain thusly:

The high land over which we passed was generally woody, though the trees were not large. The places that were free from wood, were covered with long grass and luxuriant ferns. The houses mostly stood singly, and were scattered over the face of the country.

A rich field of potatoes or taro, five or six acres sometimes in extent, or large plantations of sugar-cane and bananas, occasionally bordered our path. But though the soil was excellent, it was only partially cultivated. The population also appeared less than what we had seen inhabiting some of the most desolate parts of the island. (2004:352)

In his next entry, composed while he was in Hāmākua, Ellis elaborated on how Hawaiians marked the boundaries of their traditional land divisions:

The geographical divisions of Hawaii, and other islands of the group are sometimes artificial, and a stone image, a line of stones somewhat distant from each other, a path, or a stone wall, serves to separate the different districts or larger divisions from each other. They are, however, more frequently natural, as in the present instance, where a water course, winding through the center of the valley, marked the boundary of these two divisions [Hilo and Hamakua]. The boundary of the smaller districts, and even the different farms, as well as the large divisions, are definitely marked, well understood, and permanent.

Each division, district, village, and farm, and many of the sites of houses, have a distinct name, which is often significant of some object or quality distinguishing the place. (2004:352-353)

In a later entry titled *Description of Hamakua District*, Ellis (2004) also wrote of the romantic appearance of Hāmākua from as viewed from the sea due to the many waterfalls that extended from the summits of the cliffs to the sea. Of the coastline he recounted:

The coast is bold and steep, and the cliffs from three to five hundred feet high, partially covered with shrubs and herbage, intersected by numerous deep ravines and valleys, frequently in a high

state of cultivation, while the whole coast is ornamented with waterfalls and cascades of every description. (ibid:385)

In 1832, A.B.C.F.M. Reverend Lorenzo Lyons (also known as *Makua Laiana*) replaced Reverend Dwight Baldwin at Waimea. By 1833, Lyons recorded the following observation about the declining population of Hawai'i Island, "deaths are more numerous than births. Hence the [native] population is decreasing (Doyle 1953:72 in Maly 1994:B-23). In 1834, Lyons relocated his family to Hāmākua, staying near the 'Ele'io Church in Kanahonua, which would later become the West Hāmākua Hawaiian Church also known as the Kukuihaele church and school. Governor Kuakini had ordered the construction of the 'Ele'io Church in ca. 1835 (Franklin et al. 1994). Lyons, his wife and son were provided a house to live in by a local chief named Kalaiepu (also spelled Kaleiehu). Of their new accommodations, Lyons wrote the following in his journal:

. . . The doors were so low that we had to stoop in order to get in. The house had no window. Our bed was made of posts driven into the ground; and poles and leaves and mats. Our humble table was made by myself. We were all alone, with no society save that of the natives. To be without luxuries is no trial, but at first the thoughtlessness of the people was painful. But Mrs. L. worked with the women and children and I with the men. The schools flourished. Singing schools were large and made considerable progress. The people brought all kinds of products to exchange for books. . .

Betsy too loved Hamakua, and wrote: The climate is delightful. We live about a half mile from the ocean, and about two miles from the top of Waipio and Wamanu Palis. From our door we have a view of the precipices beyond. . . (Doyle 1953:74 in Maly 1994: B-23)

Around this time, Lyons also documented the devastating effects on the Waimea and Hāmākua populations as a result of a mumps epidemic combined with a famine brought on by a worm that had infected the crops. In May of 1835, Lyons and his family moved back to Waimea, prior to his departure he estimated the population of Hāmākua to be a little over 4,000 people (Maly 1994). Lyons visited Kanahonua in August of 1835 and remarked on the construction efforts for the church meeting house, which was "surrounded by a stone wall put up by convicts such as adulterers, etc. This is not my fault if fault it is-I remonstrated against it" (Doyle 1953:93 in Maly 1994:B-24). In August of 1837, Lyons slept on the floor of the school house and held meetings at Kukuihaele (Maly 1994). In 1841, Lyons estimated the population of Hāmākua as 3,830 and between 1845 and 1848 his journal entries described the poor health and high mortality rate of the native population as a result of starvation, measles, whooping cough, and dysentery.

The *Māhele* 'Āina of 1848

By the mid-nineteenth century, the ever-growing population of Westerners in Hawai'i forced socioeconomic and demographic changes that promoted the establishment of a Euro-American style of land ownership, and in 1848 the *Māhele* 'Āina became the vehicle for determining ownership of native lands. This change in land tenure was promoted primarily by the missionaries and Western businessmen in the island kingdom. Generally these individuals were hesitant to enter business deals on leasehold land. The *Māhele* (division) defined the land interests of Kamehameha III (the King), the high-ranking chiefs, and the *konohiki*. During the *Māhele*, all lands in the Kingdom of Hawai'i were placed in one of three categories: (1) Crown Lands (for the occupant of the throne); (2) Government Lands; and (3) *Konohiki* Lands (Chinen 1958:vii and Chinen 1961:13). The chiefs and *konohiki* were required to present their claims to the Land Commission to receive awards for lands provided to them by Kamehameha III. They were also required to provide commutations to the government in order to receive royal patents on their awards. The lands were identified by name only, with the understanding that the ancient boundaries would prevail until the land could be surveyed. This process expedited the work of the Land Commission.

All lands awarded during the *Māhele* were subject to the rights of the native tenants therein; those individuals who lived on the land and worked it for their subsistence and the welfare of the chiefs (Sinoto and Kelly 1970). Native tenants could claim, and acquire title to, *kuleana* parcels that they actively lived on or farmed at the time of the *Māhele*. The Kuleana Act of December 21, 1849 provided the framework by which native tenants could apply for and receive fee-simple interest in their *kuleana* lands from the Land Commission. The Board of Commissioners oversaw the program and administered the lands as Land Commission Awards (LCAw.). Not all lands that were claimed were awarded.

During the *Māhele*, Kanahonua Ahupua'a (LCAw. 11216) was awarded to *ali'i nui* Kekau'ōnohi, granddaughter of Kamehameha I. She was also a niece of Kalanimoku, who served as Kamehameha's *kālimoku* or land administrator and her genealogy tied her to the royal bloodlines of both the Maui and Hawai'i chiefs (Maly 1994). As a result of her high status, her claims did not need documentation and she possessed more land holdings than everyone in the

kingdom with the exception of King Kamehameha III (*ibid.*). In addition, three *kuleana* parcels (LCAw. 7859, 7131, and 7874) were awarded within Kanahonua Ahupua'a, located in close proximity to the current study area (Figure 12) all of which were claimed as house lots. LCAw. 7131 awarded to N. Ka'ai was described in the Native Register (N. R. Vol.8:278-279) as enclosed by a stone wall he built himself, where he had resided since 1837. LCAw. 7874, awarded to Wailuahi, is particularly interesting because the claimant was a female who said she received the land from her husband Kaleiehu (N.R. Vol. 8:313). The Native Testimony for LCAw. 7859 awarded to Ka'ilioholani (N.T. Vol. 4:156-157) was provided by the Konohiki Kepio, who had given the land to the claimant:

I have seen this houselot in the land parcel of Kaumakani in the land division of Kanahonua, all sides are surrounded by the chiefess [Kekau'ōnohi]. It has been enclosed and there is one house for him, I had given him this interest in 1838, he had it fenced in and is now living there. No one has ever objected to him to this day.

In addition, the Native Testimony for LCAw. 7874 (N.T. Vol. 4:296) also states that the house lot is located in the land parcel of Kaumakani within the land division of Kanahonua, which is consistent with the claim for LCAw. 7859, above.

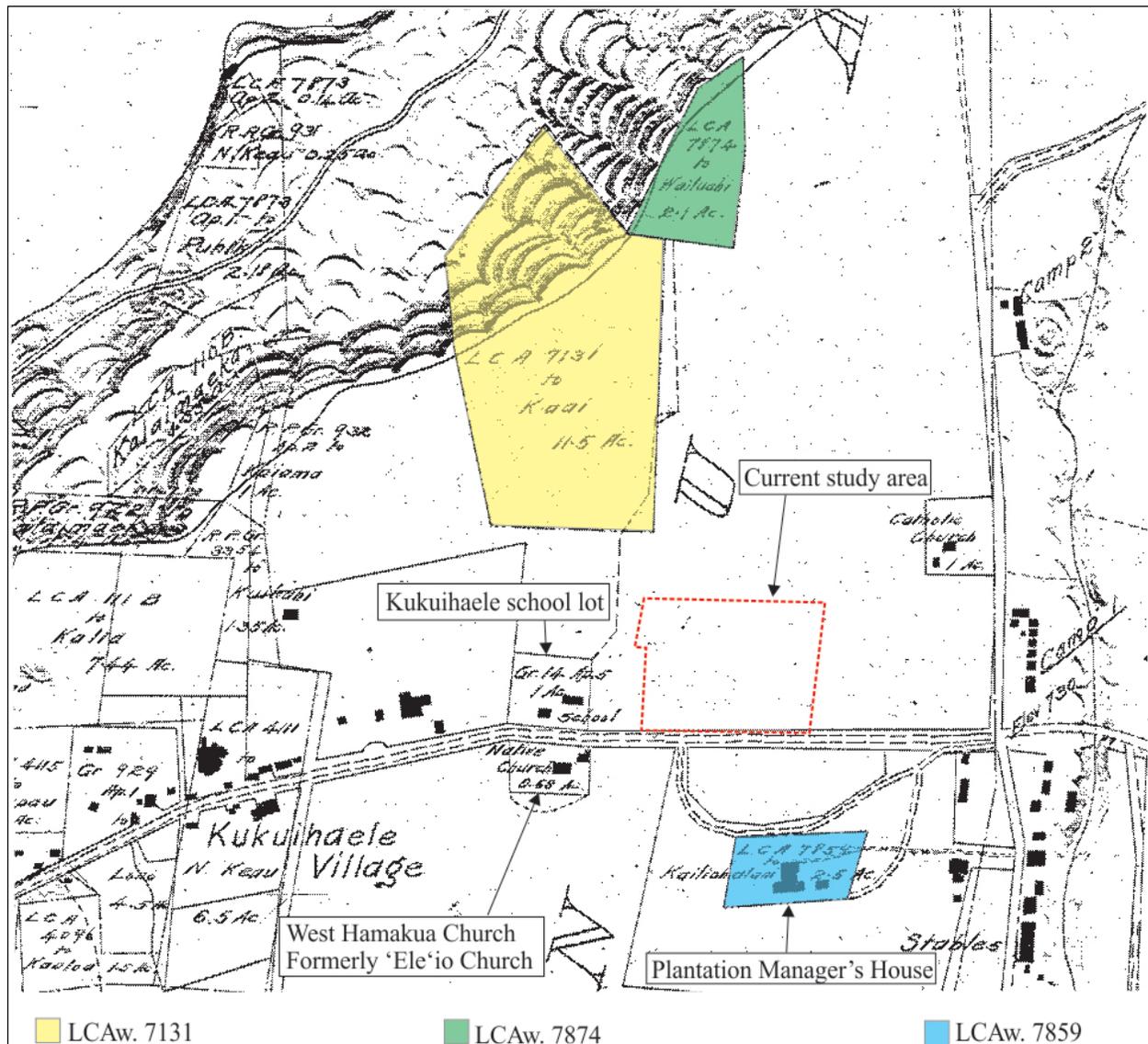


Figure 12. Detail of current study area vicinity from a Pacific Sugar Mill Plantation Map ca. 1905 showing historic property references.

2. Background

According to Maly (1994) the *māhele* records revealed that native tenants of the lands in the study *ahupuaʻa* of Kanahonua and the greater district of Hāmākua continued to cultivate crops for their own subsistence as well as for tribute to the *konohiki* and the royal family. These cultigens included both wetland and dryland varieties such as taro, *wauke* and *māmaki*, breadfruit, native sugar cane, banana, and bamboo in addition to oranges and coffee, which were recent introductions after European contact (Maly 1994). *Kuleana* parcels were often located near trails and the developing government roads for ease of access to different resource acquisition areas, and transportation purposes. The growing influence of western missionaries was evident in the establishment of churches within existing native communities, which evolved into village centers that would subsequently provide a labor force and access to transportation and shipping routes as western businesses developed in the region (ibid.).

On September 19, 1853 the ʻEleʻio Church lot, located across from the current study area on the *mauka* side of the old Government Road (present day Kukuihaele Road) was granted to the A.B.C.F.M. (Maly 1994). On that same day, the one acre School House Lot at Kanahonua, located north of the current study area, was formally established as the Kukuihaele School Lot (School Grant 14:5). A 1905 map depicts both the Kukuihaele School lot and the ʻEleʻio Church lot, which is labelled “Native Church” (see Figure 12). According to Maly (1994), on March 28, 1859, the initial stone structure of ʻEleʻio Church was completed. Rev. Lyons’ journal entries from early 1860 detail the labor the residents of Hāmākua undertook to raise funds for the purchase of construction materials and the challenges they had to overcome to build the church at the top of the *pali* thusly:

This is very self denying and badly trying labor. It is tedious work to pick it from the ferns, dry it, pack it and take it to the sea side to be shipped. Sometimes they have to descend precipitous rocks and bluffs to get their *pulu*.

But when the vessel brings the lumber, then comes the trying time! There are no harbors on the Hamakua shore. Materials must be landed at the best places that can be found, and then only at certain times of the year. In rough weather no landing can be expected... The people have to struggle hard and work long in the water before the last board is safely on the rocks. Then they must have a hard and long pull to get the lumber in from the rocky shore up the steep precipitous paths and thence up to the site of the church... (Doyle 1953:164-165 in Maly 1994: B-25)

By 1864, native pastors had taken over the congregations of three churches started by Lyons in Hāmākua (Maly 1994). Maly (1994) reports that despite the fact that native churches typically have cemeteries associated with them, his historical documentation review did not reveal any mention of a cemetery within or adjacent to ʻEleʻio Church from its establishment until it was abandoned in 1950.

Around 1868, The Roman Catholic Church acquired the lands originally awarded to *aliʻi nui* Kekauʻōnohi, comprising the majority of Kanahonua Ahupuaʻa. Kekauʻōnohi had left her lands to her husband upon her death in 1851. He followed her in death four years later, owing Bishop & Co. a debt of over \$40, 000. Maly (1994) suggests that the Roman Catholic Church purchased the land holdings at auction of the chiefess’s estate. The parcel marked Catholic Church (see Figure 12), located *makai* and to the east of the current study area corresponds with the original location of St. Theresa’s Catholic Church and Cemetery. Like most of the foreign owned land throughout the islands, much of the Roman Catholic Church’s land was transformed for the cultivation of sugar

The Sugar Industry in Hāmākua (1878-1993)

Although the sugar industry was owned and operated primarily by foreign investors and businessmen, sugarcane was widespread throughout the islands of Hawaiʻi since the early Prehistoric Period. Sugarcane was brought to Hawaiʻi by the initial settlers from Polynesia and was used medicinally, as a snack, as a condiment, and also used to strengthen children’s teeth by chewing on it (Handy and Handy 1972). Sugar cane was also used to thatch houses when *pili* grass or *lau hala* were not abundant (Malo 1903). The Chinese on Lānaʻi are credited with the earliest production of sugar ca. 1802; however, it was not until 1835 that the commercial production of sugar became established in the Hawaiian Islands (Oliver 1961, Kuykendall and Day 1976). The following excerpt summarizes the history of the sugar industry along the Hāmākua coast:

The premiere site for sugar growing on the island of Hawaiʻi ran 20 miles southeast from Waipiʻo Valley to the town of ʻOʻōkala. This coastline contained some of the most gulch-ridden acreage on the entire island. But the gully-divided lands above the shore cliffs had rich soil blessed with heavy runoff from the slopes of Mauna Kea. Reaching, cultivating, and harvesting these lands challenged sugarcane farmers. Eventually the many small plantations along this coast were combined into one large operation. When the end came in 1993, there was one survivor, Hamakua Sugar Company. (Dorrance and Morgan 2000:90)

The Pacific Sugar Mill was the most remote of the twenty sugar plantations that sprang up along the Hāmākua coast between 1876 and 1888, with fields located between Waipi‘o valley to the north and the Honokaa Sugar Company lands to the south (Dorrance and Morgan 2000). According to Maly, “plantation communities usually developed around earlier Hawaiian – church settlements, and many *kuleana* were assimilated into plantation holdings for various reasons” (1994:B-28). Indeed, LCAw.’s 7131, 7859, and 7874 in the vicinity of the current study area appear to have been subsumed within the cultivated fields of the Pacific Sugar Mill Plantation (Figure 13). The current study area, which falls within Field 1 of the Pacific Sugar Mill’s land holdings (see Figure 13), was also planted with sugarcane during the early years of the plantation (until the mid-1930s). Plantation related development located in close proximity to the current study and Kukuihaele School included multiple structures in Kukuihaele Village, camps and stables (see Figure 12) and the plantation manager’s house in addition to plantation infrastructure such as flumes, ditches and roads (see Figure 13).

According to Dorrance and Morgan, “each mill on the Hāmākua Coast had a landing. Using lighters, raw sugar and plantation supplies were delivered to and from vessels anchored offshore (2000:91).” The mill and landing (Kukuihaele Landing) operated by the Pacific Sugar Mill were located to the northeast of the current study area in Kea‘ā Ahupua‘a (Figure 14). The mill site was linked to the cane lots by the plantation tramway, the government road, a narrow gauge railway system, and a flume network. In order to get the milled sugar to vessels for export, the Pacific Sugar Mill and later the Honokaa Sugar Company utilized the landing at Kukuihaele as a shipping facility. The Kukuihaele Landing (see Figure 1) was one of nine wire landings on the windward coast of Hawai‘i Island (Nelson 1974). Wire landings were developed in the late 1890s and consisted of four mooring buoys that were anchored offshore in a rectangular configuration to which a vessel would tie itself facing into the wind (ibid). A structure known as a hoist house, located on top of the bluff (Figure 15), held the equipment used to run a cable car along the wire from the bluff to the awaiting vessel offshore.

The following excerpts of historical information pertaining to the Pacific Sugar Mill was compiled by Kalima (1991) from the Hawaiian Sugar Planters Association Archives (H.S.P.A.):

. . . It extended along the coast for four miles and up the mountains for two to nine miles. The elevation ranged from 300 to 1,900 feet giving a variety of growing conditions. Half of the land was arable; the remainder was pasture and forests.

The beginnings of the Pacific Sugar Mill are not entirely clear. A Charter of Incorporation dated August 19, 1879 lists Samuel Parker and F.A. Schaefer as the founders. Other published sources cite Dr. Mott-Smith, Dr. Trousseau and Mr. Herbert Purvis as founders/proprietors of the enterprise. Material in the collection does confirm that the plantation was started in 1878 and the first crop harvested in 1880 with F.A. Schaefer and Co. as the agents.

Pacific Sugar Mill had the distinction of introducing the first mongoose into Hawaii. In 1883 W.H. Purvis imported them from India and Africa for rat control on the plantation. . .

While most plantations had a small herd of cattle, Pacific Sugar Mill was unusual because it also had over 600 head of sheep. Free mutton was provided for employees along with free housing, fuel and medical care. As on most plantations, the early work force consisted of Chinese and native Hawaiians. Later on Japanese, Portuguese, Spaniards, Puerto Ricans, Koreans, and Filipinos came to work on the plantation both as day laborers and contract workers.

By 1908 Pacific Sugar Mill had a nine-roller mill and produced an average crop of three tons per acre. The cane was delivered by flumes to a railroad which stretched across the plantation from east to west. The railroad was about four miles long and extended from Kukuihaele landing to the plantation’s Honoka‘a’s [sic] boundary. Pacific Sugar Mill also had a wire rope landing to transport sugar bags to steamers for shipment.

The water for the flumes was obtained by diverting the Hi‘ilawe Stream which had its source in the Kohala Mountains. Pacific Sugar Mill also had the water rights to Lalakea Stream and to Kukuihaele Valley Stream. The water was transported partly through a flume and partly by a ditch to a reservoir at the head of the plantation. Four more reservoirs with an estimated capacity of 50,000,000 gallons were also constructed. This supply of water not only enabled Pacific Sugar Mill to transport all of its cane to the mill but was sufficient enough to enable Honokaa Sugar Company to flume 50% of it crop. (1991:B9-10)

2. Background



Figure 13. Portion of combined Pacific Sugar Mill Field Maps ca. 1909-1911 showing current study area boundary in red and historic properties in the vicinity, adapted from Maly (1994:B-18).



Figure 14. 1916 USGS map showing location of mill site and landing of the Pacific Sugar Mill.

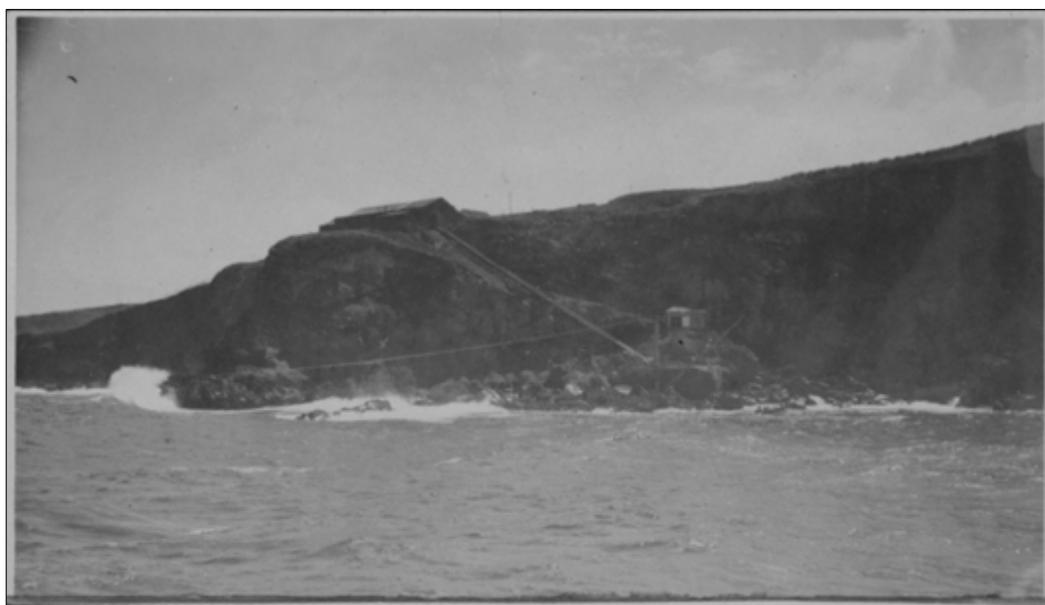


Figure 15. Kukuiahaele Landing ca. 1910, showing hoist house and cables.

According to the H.S.P.A. archives, the Pacific Sugar Mill failed as a viable business enterprise largely due to mismanagement, which was exacerbated by an epidemic of a livestock disease in 1907 (Kalima 1991). Dorrance and Morgan write of the Pacific Sugar Mill's subsequent decline, "Beginning in 1913, the plantation shut down its mill, connected its railroad to the neighboring Honokaa plantation, and had its cane ground by the Honokaa Sugar Company" (2000:93). At this time, the administration of the Honokaa Sugar Company and the Pacific Sugar Mill was brought under one manager (Kalima 1991). This partial merger was a success and soon yielded a ten-fold increase in production compared to the original harvest (Dorrance and Morgan 2000). Then in 1928 F.A. Schaefer formally dissolved the Pacific Sugar Mill and became the Kukuiahaele Division of its neighbor, Honokaa Sugar Company (Kalima 1991; Dorrance and Morgan 2000).

In 1929, the Honokaa Sugar Company began utilizing the Kukuiahaele Landing to direct ship raw sugar to San Francisco (Dorrance and Morgan). Around this time, (the 1930s) Handy and Handy (1972) observed wet taro fields of Hāmākua that extended from Honoka'a to neighboring Kukuiahaele Ahupua'a, which indicates that traditional

2. Background

agricultural practices continued in the gulches at the same time that sugar was being cultivated on the flat lands between. Handy and Handy (1972) noted the presence of high walled terraces watered by Waikoekoe Stream, but that several of the smaller upland terraces had been converted to reservoirs by the sugar company.

Honokaa Sugar Company continued to use the Pacific Sugar Mill's landing until it was shut down during World War II. Following the war, after the 1946 *tsunami* destroyed the railroad and it closed, shipment resumed from Kukuihaele Landing until 1949, when bulk sugar began to be shipped via trucks for export from the port of Hilo (*ibid*). In 1951, Theo Davies bought F.A. Schaefer & Company in order to acquire Honokaa Sugar Company. In 1972, Davies purchased Pauhau Sugar Company and merged it with Honokaa Sugar Company. In 1979, Honokaa Sugar Company was merged with Laupahoehoe Sugar Company to form Davies Hamakua Sugar Company, which in 1984 was purchased by Francis Morgan who dropped the Davies from the name and created Hāmākua Sugar Company. Hāmākua Sugar Company operated from 1984 until 1993, when the fields were harvested for the last time and the 36,000 acre plantation was shut down for good.

As can be gleaned from the discussion of the Hāmākua sugar industry above, even though the Pacific Sugar Mill failed as an independent entity by 1928, sugar continued to provide jobs to residents in the community until the 1990s when Hamakua Sugar ceased operations entirely. The aerial photograph reproduced in Figure 16 below shows the extent of sugar cane cultivation in the vicinity of the current study area. Sugar cane fields have since given way to Macadamia nut orchards located between Kapulena and Kukuihaele. However, the sugar plantation manager's house (SIHP Site 15006) remains as a reminder of over a century of sugar cultivation. The historic house is situated in the ʻili of Kaumakani (*lit. translation: placed in the Wind*) across from the current study area on the *mauka* side of Kukuihaele Road within LCAw. 7859 (see Figures 12 and 13). This Historic Property will be discussed in further detail in the Previous Archaeology section below.



Figure 16. Hāmākua coastal lands showing extensive cane lots in the vicinity of the current study area ca. 1954.

The Kukuihaele School and Park

A review of correspondence and historic documents related to the Kukuihaele School lot and the current study area, in particular provided valuable information and a timeline for the development of the area since the late 1800s. Details from these documents highlighting the development of the school and park property are summarized below.

According to the Inventory of Structures and Improvements of Land for the Kukuihaele School Grounds for the years 1885 through 1961 a wooden schoolhouse building was constructed or improved upon in 1885. A wooden schoolhouse building also appears in a later entry dated 1913. In 1915, another wooden building specified as a cottage is listed with an associated structure and improvement cost of \$1,000.00. In 1931, a five acre addition to the Kukuihaele School Lot was proposed (C.S.F. 5936), which corresponds with the location of the current study area and extends beyond the western boundary of the roughly four acre study area (Figure 17).

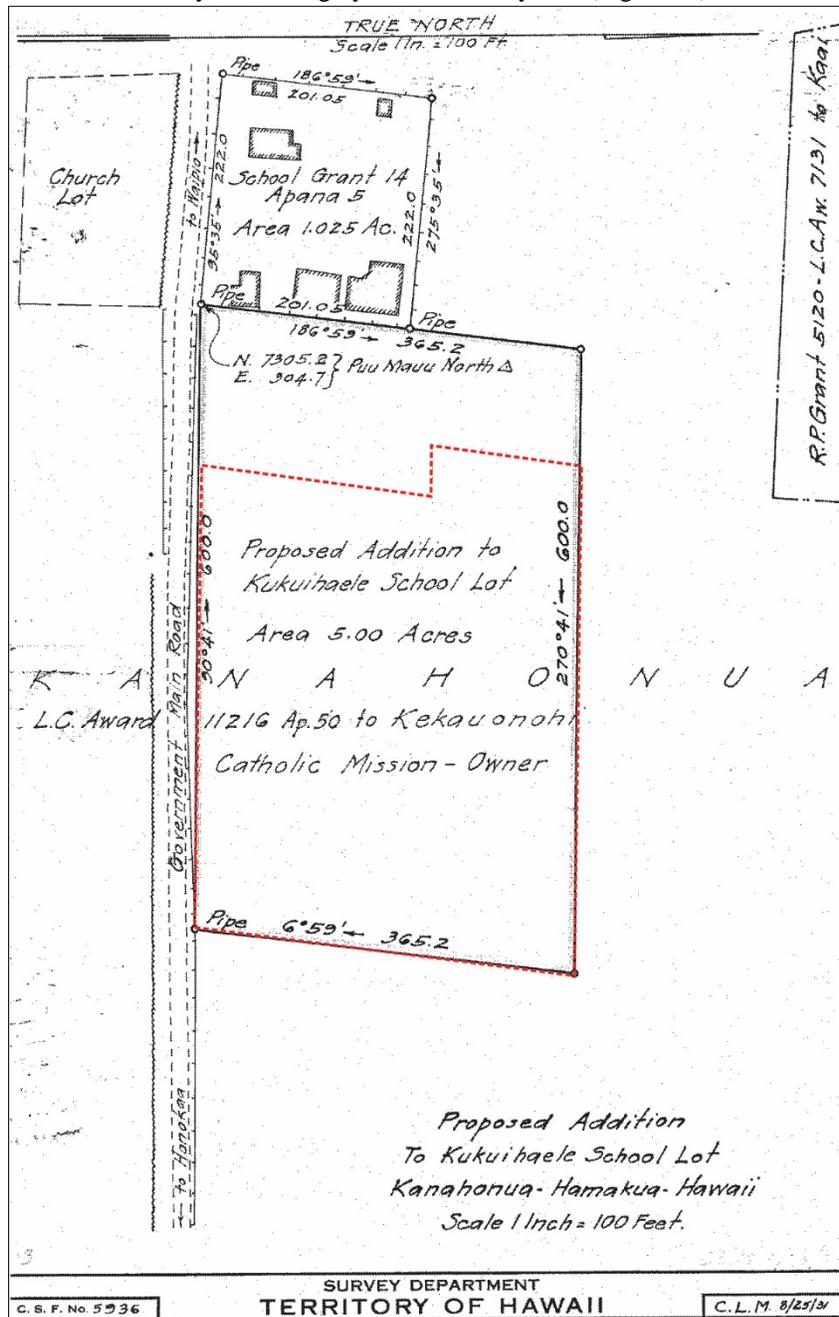


Figure 17. 1931 map (C.S.F. 5936) showing the current study area as a proposed addition to the Kukuihaele School Lot.

2. Background

On January 28, 1932, the five acre parcel, which includes the current study area, was deeded to the Territory of Hawai'i by the Roman Catholic Church of the Territory of Hawai'i (Land Office Deed 4324). In 1940, another cottage is listed in the structure and improvement inventory, and described as a duplex with an associated cost of \$4,650.00, which was considerably more than the cost for the 1915 cottage. The cost of the duplex cottage structure and improvements is the single most expensive undertaking included in the inventory, which may imply that the 1940 cottage was larger, and of higher quality with more amenities. The 1940 duplex cottage likely corresponds with a building marked "cottage" that appears within the current study area parcel in a 1964 Plot Plan of the Kukuihaele School (Figure 18).

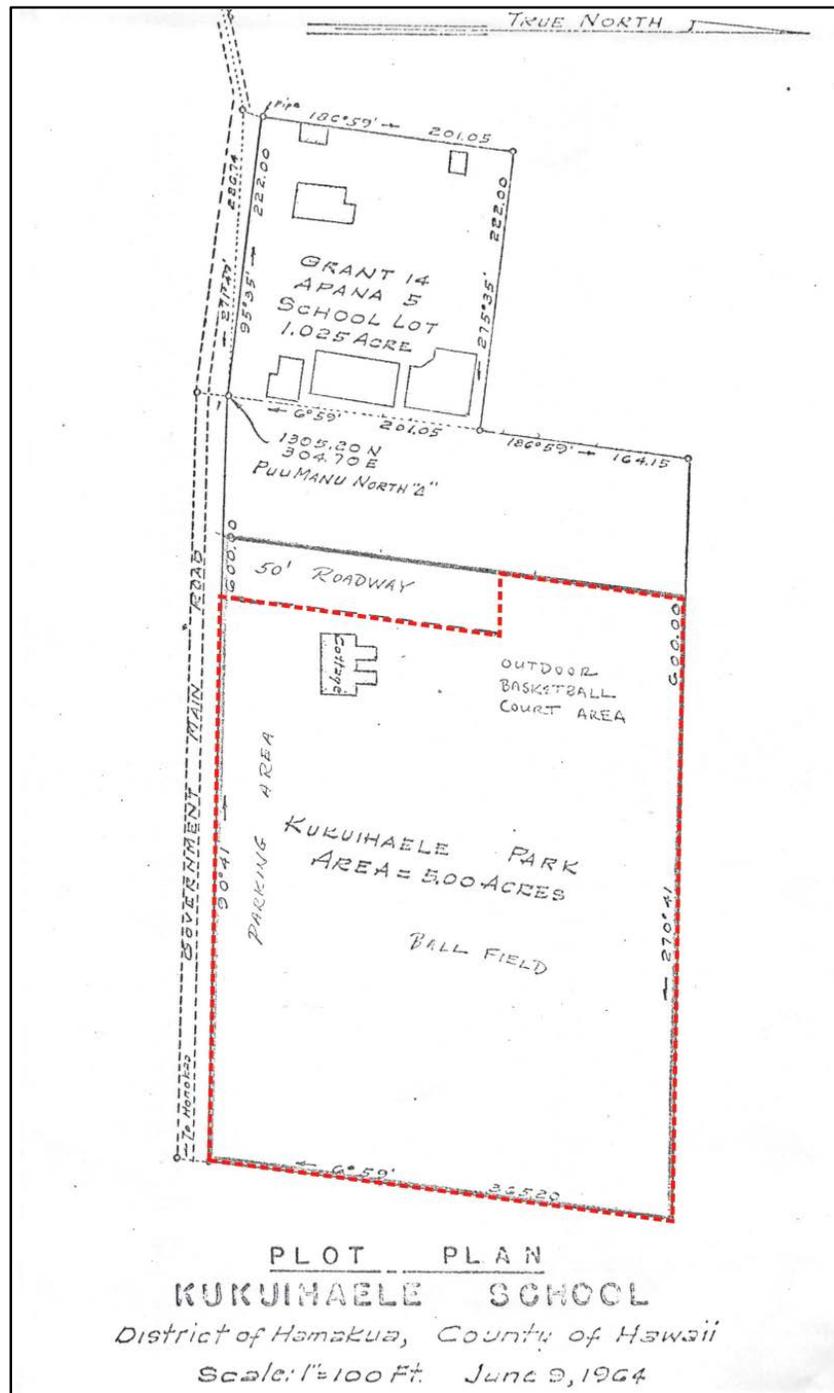


Figure 18. Kukuihaele School lot ca. 1964 showing location of historic cottage building and current study area boundary in red.

Around the same time that the cottage was constructed, the Honokaa Sugar Plantation installed a baseball field in the northeastern portion of the five acre parcel that falls within the current study area (see Figure 18). The Kukuihaele School remained in operation until 1965, at which point the Department of Education began an arduous process with the ultimate goal of turning the entire parcel over to the County of Hawai‘i for use by the Parks and Recreation Department. The five acre parcel was classified as Section B of Executive Order No. 527, which had to be cancelled prior to its return to the State of Hawai‘i for use as a park. The initial request for action languished for two years until the Board of Supervisors of the County of Hawaii convened on September 6, 1967 and made the following request to Governor Burns in a letter dated September 14, 1967:

The County would like to provide this recreational service for the people of this area on a permanent basis if the requested site is made available for acquisition.

Subsequently, on March 24, 1969 the Director of the Department of Parks and Recreation submitted a request to the Superintendent of the Department of Education for authorization to use the former Kukuihaele school buildings for recreational and community functions for the County. In a letter to the Chairman of the Board of Land and Natural Resources dated June 3, 1976, Mayor Matayoshi outlined the County’s plans for the current study area. Although the school had been closed for more than ten years and the Department of Education had initiated the transfer of the lands to the Parks Department, the recreational facility in Kukuihaele remained part of an envisioned plan, rather than a reality. This plan included seeking federal funding for the development of the community center and the conversion of the former duplex cottage to a facility for meetings and other indoor activities. A brief mention is made at the end of the letter to an existing revocable permit for the use of the former teacher’s cottage issued to a Mr. Tanaka, which suggests that Mr. Tanaka be allowed to remain on the premises until the community center project was initiated.

A 1978 letter accompanying a petition for the addition of two tennis courts to the existing school playground facility is a valuable source of information about the current study area. The letter is composed by Paul Christensen (1910-2006), a member of the Kukuihaele community since 1933, originally from New York who worked for over forty-two years for Honokaa Sugar Company. He was a revered member of the community and recorded daily events at the sugar plantation and the Kukuihaele area in thousands of photographic images (the Paul Christensen Photographic Collection). The letter reveals that the baseball field known locally as Kukuihaele Baseball Park had originally been part of the school playground facility in addition to the basketball court. Furthermore, the area below the duplex teacher’s cottage and the basketball court was known locally as “the school garden plot”. In addition, it appears that the old cottage was still inhabited at the time the letter was written (in 1978). A selection of his photographs depicting the current study area are reproduced below (Figures 19-23).



Figure 19. Kukuihaele School building, view *makai* (Photo: NHERC Heritage Center Paul Christensen Collection).

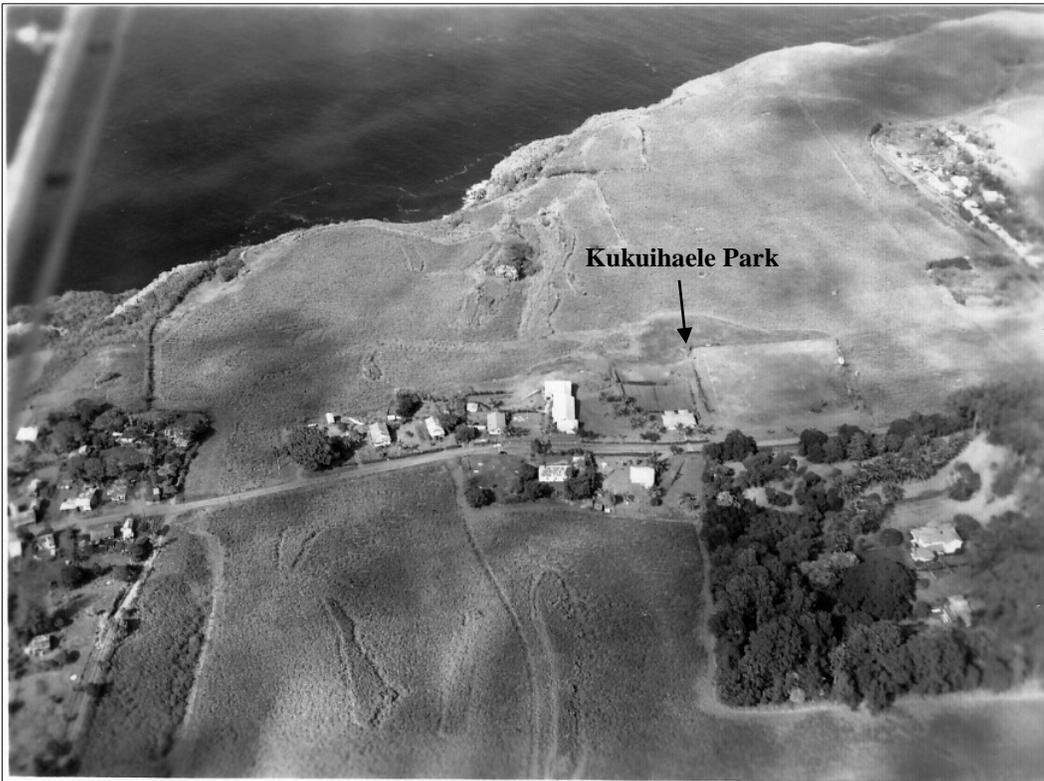


Figure 20. Kukuihaele aerial showing teacher's duplex cottage and adjacent ball field in ca. 1950 (Photo: NHERC Heritage Center Paul Christensen Collection)



Figure 21. Kukuihaele Athletic Club in front of ball field backstop, view to the northwest (Photo: NHERC Heritage Center Paul Christensen Collection).



Figure 22. Kukuihaele baseball park with second base in foreground, view *makai* (Photo: NHERC Heritage Center Paul Christensen Collection).



Figure 23. Kukuihaele park aerial with duplex teacher's cottage ca.1960s, view *mauka* (Photo: NHERC Heritage Center Paul Christensen Collection).

By 1991, the current study area is referred to as Kukuihaele Park in official correspondence. A January 24, 1991 letter from the Parks Department reports that playground equipment was installed at Kukuihaele Park and goes on to assure that park maintenance would be upgraded to bring the park back to its fullest potential for the enjoyment of the community. A 1999 letter to the Parks Department from the County Council sought to address the lack of suitable parking for the park and the damage caused by people driving into the park. Shortly thereafter, this letter was followed by a Department of Parks and Recreations memorandum confirming that the State planned to demolish the former teachers' cottages on the parcel adjacent to the current study area and then turn the site over to the County of Hawaii as an addition to the park. Based on a review of aerial images, the cottage was still standing in early 2000, and was demolished sometime thereafter. Finally, in January of 2003 the official boundaries of the park site at Kanahanua were determined (C.S.F. No. 23,444).

PREVIOUS ARCHAEOLOGICAL STUDIES

Since the beginning of the early twentieth century, Waipi'o Valley to the west of the study area has drawn the focus of much of the archaeological research in the Hāmākua District. Very few previous archaeological studies have been conducted in Kanahanua Ahupua'a. The earliest archaeological studies that included Kanahanua Ahupua'a were three separate surveys focused on the identification and recording of *heiau* and coastal sites during the early 1900s (Thrum 1908; Stokes 1919; Hudson 1932). These early endeavors did not reveal any sites in the vicinity of the current study area or Kanahanua Ahupua'a in general. Over the next sixty years there were no archaeological studies conducted in Kanahanua Ahupua'a. However, in 1974, the Honoka'a Sugar Company Manager's House located on the *mauka* side of Kukuihaele Road opposite the current study area (TMK: (3) 4-8-006:003), was added to the Hawaii Register of Historic Places (HRHP) and assigned HRHP identification number 50-10-7-7176. The house was designed by Edgar A.P. Newcomb and built ca. 1920. According to Franklin et al. (1994), the site has been off of the State Register of Historic Places since 1980 and was designated as SIHP Site 15006 as a result of a 1991 survey (Head and Goodfellow 1991), which will be discussed along with the results of another relevant study below.

In 1991, Paul H. Rosendahl, Inc. (PHRI) conducted an archaeological inventory survey (Head and Goodfellow 1991) of 3,770 acres known as the Waipio Lands of the Hamakua Sugar Company (Figure 24). Their study area included a portion of Kanahanua Ahupua'a and crossed five adjacent *ahupua'a*. As a result of their combined variable-coverage aerial and pedestrian survey, augmented with limited subsurface testing, PHRI recorded forty-four sites (SIHP Sites 14986-15029) containing one hundred and twenty-six features. The sites consisted of twenty multi-component complexes and twenty-four single feature sites. Agricultural terraces were the most commonly encountered feature type (n=47) followed by modified outcrops (n=18) within their project area, which also contained a few mounds, walls, enclosures and platforms. Site function was classified primarily as agriculture or habitation or a combination of the two functions. In the vicinity of the current study they recorded two cemeteries (Sites 15008 and 15009) and a historic residence (Site 15006). Site 15008 is located southwest of the current study area near Highway 240, and described as a historic cemetery with a small wooden building and approximately fifty graves. Site 15009 is another historic cemetery consisting of approximately 58 graves located along the boundary between Kanahanua and Waiko'eko'e Ahupua'a, east of the current study area (see Figure 24). As previously mentioned, the historic residence designated Site 15006, appears to correspond with HRHP 7176, PHRI described the site in 1993 as series of wooden structures in fair-good condition located in a slightly sloping area between Highway 240 and Kukuihaele Town (see Figure 24).

In August 1993 and June 1994, PHRI conducted additional archaeological survey (Franklin et al 1994) of a portion of the aforementioned Head and Goodfellow (1991) project area (TMKs: (3) 4-8-006: 008, 009, 011, 013, 043, 044) in order to record the condition and collect supplementary data for some of the previously recorded sites within Kanahanua and Waiko'eko'e Ahupua'a (see Figure 24). As a result of their revisit, PHRI relocated seven previously recorded sites, including Sites 15006, 15008, and 15009 in the vicinity of the current study area. Franklin et al. provide a more detailed description of Site 15006, referring to the 8.5 acre site as a "well-tended estate composed of the following architectural features: main house, keeper's cottage, 3-car carport, small porte cochere, gardens, paved driveway and parking area, tennis court, and swimming pool (1994:24)." Of Site 15008 Franklin et al. add that the historic cemetery is the aforementioned Saint Theresa Catholic Cemetery with headstones dating from 1883-1991, and that the associated wooden structure is not of historic origin. Franklin et al. describe Site 15009 as a historic Hawaiian cemetery with graves dating back to 1879, which was still in use at the time of their study (ca. 1994), and which corresponds to the location of the County Cemetery established in 1935, mentioned above.

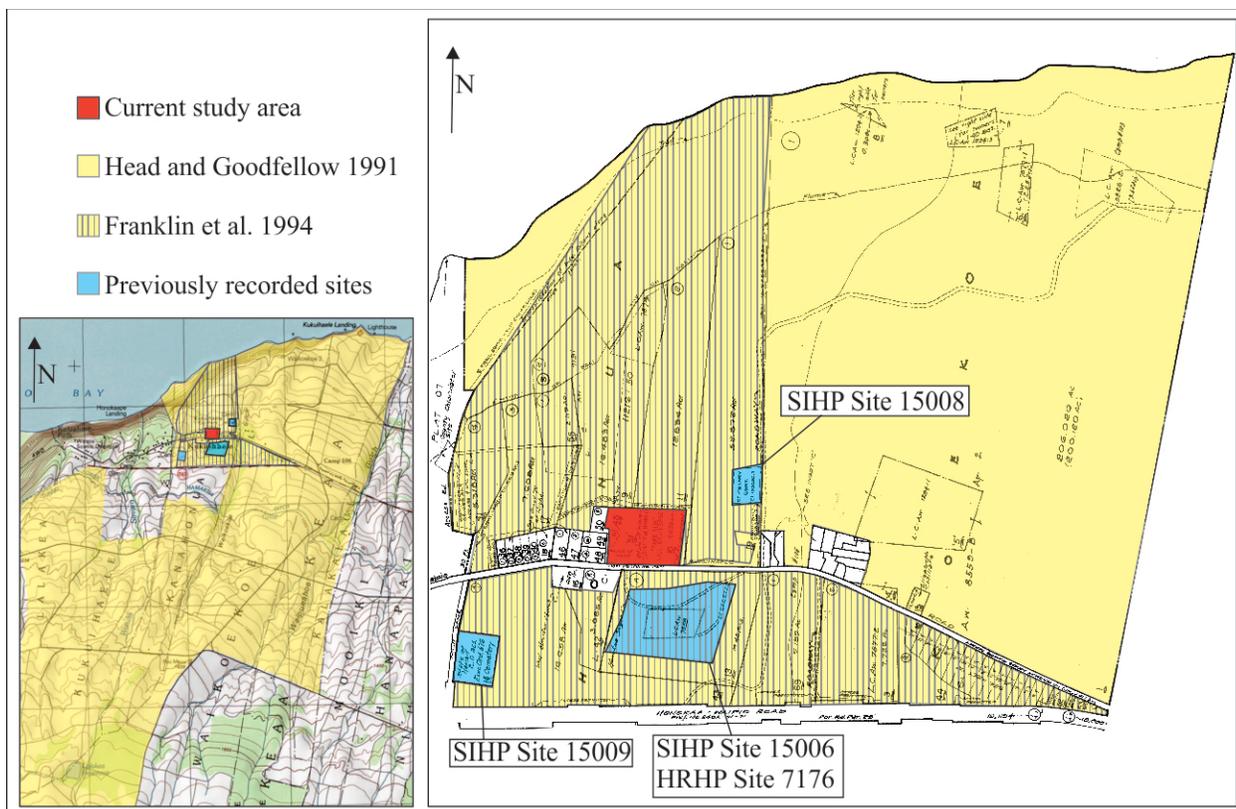


Figure 24. Previous archaeological studies conducted in the vicinity of the current study area.

In 2007, Cultural Surveys Hawai‘i, Inc. (CSH) prepared a supplemental archaeological surveying, recordation, monitoring, discovery, and data recovery plan (Hazlett et al. 2007) for the Hāmākua Ditch System. Their project area consisted of a 50-foot wide corridor that extends roughly east-west for five miles across twenty-six *ahupua‘a* in the Hāmākua District, including Kanahonua. No fieldwork was conducted within Kanahonua Ahupua‘a as part of that study, nor were any archaeological findings presented, although the Lower Hāmākua Ditch, which passes through the *ahupua‘a*, *mauka* of the current study area, is itself a Historic property.

3. STUDY AREA EXPECTATIONS

In *A Regional Synthesis of the Hāmākua District, Island of Hawai‘i*, Dr. Ross Cordy (1994) summarized the general Prehistoric and early Historic land use patterns for the entire district of Hāmākua. The summary is based on a review of *Māhele* records combined with a detailed examination of archival historical information and archaeological site records. According to Cordy, the study *ahupua‘a* of Kanahonua falls within the subregion he termed the Lower Windward Slopes of Mauna Kea, which is part of the greater region of East Hāmākua.

Cordy (1994) defined four general environmental zones within East Hāmākua: (1) the Sea-shore, (2) the Seaward Upland Slopes, (3) the ‘Ōhi‘a-Koa Forest Zone, and (4) The Gulches. The current study area is located just above the Sea-shore within the lower portion of the Seaward Upland Slopes. The Seaward Upland Slopes was the primary residential and farming zone in the region. *Kuleana* parcels, consisting of house lots with nearby non-irrigated garden plots were concentrated here between the sea cliffs and the *Alanui Aupuni* or Government Road. The dominant crop of the Seaward Upland Slopes, in general, was dryland taro, but sweet potatoes and bananas were also commonly grown (ibid). However, Kanahonua Ahupua‘a was among those mentioned by Cordy to be an exception to the dryland agricultural trend, for it appears that walled and terraced pondfields were planted with taro along streams in the more western *ahupua‘a* of East Hāmākua (ibid). Trails linking the permanent housing areas in the Seaward Slopes Zone with the Forest Zone also existed, in addition to rock cairns and rock walls that marked the boundaries of *ahupua‘a* and separated agricultural fields (ibid).

As previously discussed, prior archaeological investigations in the vicinity of the current study area found Historic Period sites related to the local sugar plantation and the community that emerged as a result of the sugar industry. However, none of these sites were recorded within the current study area itself. The current study area was a cane field during the late nineteenth to early twentieth century prior to becoming part of the Kukuihaele School lot and playground during the mid-twentieth century. This parcel was developed into the current park configuration during the 1940s, and been used continuously for that purpose ever since. A teacher’s cottage/duplex, built in 1940, was present on the property until it was demolished during the early 2000s.

Based on the specific land use history for the current study area as a park and former sugar cane field in addition to the data gathered from extensive background research, and a review of archaeological fieldwork previously conducted in the vicinity of the current study area, the archaeological expectations are limited. It is highly unlikely that any evidence of Precontact sites such as ancient foot trails or temporary habitations will be encountered, as over a half century of sugar cultivation likely removed any evidence of these former site types. Previous archaeological studies conducted in the vicinity of the current study area have shown that sugar plantation related features, such as irrigation ditches, flumes, remnants of the tramway or railway, wooden structures, and roads are much more likely to be encountered. However, any evidence of these site types formerly present within the study area were likely destroyed when the parcel was converted to a park in the 1940s. It is possible that remnants of the Historic teacher’s cottage or other Historic park infrastructure will be encountered within the study area, but again the park property has been updated (maintained) continuously over the years, and the teacher’s duplex was removed in the early 2000s, indicating that Historic elements of the park property are not likely to remain.

4. CURRENT FIELD INVESTIGATION

Fieldwork, consisting of 100% pedestrian survey of the roughly four acre study area, was conducted on October 9, 2015 by Matthew R. Clark, B.A and Lauren Kepa‘a under the direction of Robert B. Rechtman, Ph.D. The surface of the entire park parcel, including the overgrown areas along the boundaries, was examined for extant archaeological remains, but none were encountered. All of the existing park infrastructure, including three concrete slabs for picnic tables and the concrete basketball court, appear less than fifty years old. Portions of several other broken concrete slabs that were also likely formerly foundations for picnic tables have been moved to the edge of the ball field for eventual disposal. No evidence of the former teacher’s duplex was identified.

As part of the draft EA, an effort was made to obtain information from knowledgeable informants about any potential traditional cultural properties and associated practices that might be present or have taken place in on the park property. The EA team spoke with Milton Lau Kong, who was born and raised in Waipi‘o Valley, with both parents of Chinese and Hawaiian ancestry. He attended 8 years at Kukuihaele School and has lived next to Kukuihaele Park for 40 years. His information on the property and history of Kukuihaele was extremely helpful for understanding the Historical context; he witnessed the dismantling of the teacher’s duplex, and indicated that substantial site work was required to completely remove the structure and return the area to lawn. Mr. Lau Kong supports improvement of the park, and did not see any negative impacts to cultural properties or practices. He stated that his concern was for children in the area, and he wanted to see the park regain its recreational importance in his community. Similar sentiments were expressed by Gladys Toko, whose father, Victor Hauanio, was the pastor of the Hawaiian Congregationalist Church in Kukuihaele and who has lived in the area her entire life, as well as Lawrence Fujioka, a lifelong resident. None of the interviewed Kukuihaele residents indicated that the park currently supported any traditional cultural uses or that the project would adversely impact cultural practices or resources.



Figure 25. Broken concrete slabs moved to the edge of the ball field, view to the east.

5. CONCLUSION AND RECOMMENDATIONS

As a result of the current Archaeological Assessment survey there were no archaeological resources identified of any kind within the current study area. Thus, it is our conclusion that the proposed improvements to Kukuihaele Park will not affect any historic properties. With respect to the historic preservation review process of both the Department of Land and Natural Resources–State Historic Preservation Division (DLNR–SHPD) and the County of Hawai‘i Planning Department, our recommendation is that no further work needs to be conducted prior to or during project implementation. In the unlikely event that significant archaeological resources are discovered during the implementation of the proposed park improvement project, work should cease in the area of the discovery and DLNR–SHPD contacted pursuant to HAR 13§13-280-3.

REFERENCES CITED

- Bellwood, P.
1978 *The Polynesians, Prehistory of an Island People*. London: Thames and Hudson, Ltd.
- Burtchard, G.
1995 Population and Land Use on the Keauhou Coast, the Mauka Land Inventory Survey, Keauhou, North Kona, Hawai‘i Island. Part I: Narrative Volume. International Archaeological Research Institute, Inc. (IARII). Prepared for Belt Collins and Associates and Kamehameha Investment Corporation, Honolulu.
- Cartwright, B.
1933 Some Aliis of the Migratory Period. *Bishop Museum Occasional Papers*, 10(7). Honolulu.
- Chinen, J.
1958 *The Great Mahele: Hawaii’s Land Division of 1848*. Honolulu: University of Hawaii Press.
1961 *Original Land Titles in Hawaii*. Honolulu: privately published.
- Cordy, R.
1994 *A Regional Synthesis of Hāmākua District, Island of Hawai‘i*. Historic Preservation Division, Department of Land and Natural Resources, State of Hawai‘i.
- Dorrance, W., and F. Morgan
2000 *Sugar Islands: The 165-Year Story of Sugar in Hawaii*. Mutual Publishing, Honolulu, Hawaii.
- Ellis, W.
2004 *Journal of William Ellis, A Narrative of an 1823 Tour Through Hawai‘i*. Mutual Publishing.
- Fornander, A.
1880 *An Account of the Polynesian Race*. Trubner: London.
1969 *An Account of the Polynesian Race: Its Origins and Migrations*. Tokyo: Charles E. Tuttle Co., Inc.
- Franklin, L., K. Maly, and J. Head
1994 Archaeological Inventory Survey Kukuihaele Project (Amanresort At Kukuihaele), Lands of Kanahonua and Waiko‘eko‘e Hamakua District, Island of Hawai‘i (TMK:3-4-8-06:8,9,11,13,43,44). PHRI Report 1408-061794 prepared for Kukuihaele Development Company, Hilo.
- Handy, E., and E. Handy
1972 *Native Planters in Old Hawai‘i*. B.P. Bishop Museum Bulletin 233. Bishop Museum Press, Honolulu. (With M. Pukui).
- Hazlett, A., Shideler, D., and Hammatt, H.
2007 Supplemental Archaeological Surveying, Recordation, Monitoring, Discovery, and Data Recovery Plan for the Hamakua Ditch System, Lālākea, Kukuihaele, Kanahonua, Waio‘eko‘e, Kea‘ā, Pu‘u‘ōpaha, Kalakala‘ula, Mo‘oiki 1, Hanapai, Niupuka, Kana, Pa‘akō, Puanui, Papalapuka, Waikōloa, Wai‘ale‘ale, Kapulena, Ka‘auhuhu, Ke‘ahakea, Hauko‘i, Mo‘oiki 2, Manae, Kapoa‘ula, Malanahae and Honokai‘a Ahupua‘a, Hāmākua District, Hawai‘i Island, Portions of TMK: [3] 4-06, 4-07, and 4-08. Cultural Surveys Hawai‘i Job Code: LALAKEA 1. Prepared for Belt Collins Hawaii, Ltd.

References Cited

- Head H., and S. Goodfellow
1991 Archaeological Inventory Survey Hamakua Sugar Company Waipio Lands, Lands of Lalakea, Kanahonua, Waikoekoe, Keaa, and Kalakalaua, Hamakua District, Island of Hawaii (TMK:4-8-01:4,5; 4-8-02:4,5; 4-8-03:6; 4-8-04:1,2,3; 4-8-05:1,2,3,4,5,6; 4-8-06:1,2,3,7,8,9,11,13,43; 4-8-08:19,23). PHRI Report 1019-011991 prepared for Hamakua Sugar Company, Honolulu.
- Hommon, R.
1986 Social Evolution in Ancient Hawai'i. IN Kirch, P.V. (ed.), *Island Societies: Archaeological Approaches to Evolution and Transformation*: 55-88. Cambridge: University Press.
- Hono-ko-hau Study Advisory Commission
1974 *The Spirit of Ka-Loko Hono-Ko-Hau*. National Park Service, U.S. Department of the Interior.
- Kalima, L.
1993 Appensix B, Hisotircal Documentary Research, in Head H., and S. Goodfellow Archaeological Inventory Survey Hamakua Sugar Company Waipio Lands, Lands of Lalakea, Kanahonua, Waikoekoe, Keaa, and Kalakalaua, Hamakua District, Island of Hawaii (TMK:4-8-01:4,5; 4-8-02:4,5; 4-8-03:6; 4-8-04:1,2,3; 4-8-05:1,2,3,4,5,6; 4-8-06:1,2,3,7,8,9,11,13,43; 4-8-08:19,23). PHRI Report 1019-011991 prepared for Hamakua Sugar Company, Honolulu.
- Kirch, P.
1984 *Evolution of the Polynesian Chiefdoms*. Cambridge University Press, New York.
1985 *Feathered Gods and Fishhooks: An Introduction to Hawaiian Archaeology and Prehistory*. Honolulu: University of Hawaii Press.
1990 Monumental Architecture and Power in Polynesian Chiefdoms: A Comparison of Tonga and Hawaii. *World Archaeology* 22(2).
2011 When did the Polynesians Settle Hawai'i? A Review of 150 Years of Scholarly Inquiry and a Tentative Answer. *Hawaiian Archaeology* Vol. 12:3-26.
- Kuykendall, R., and A. Day
1976 *Hawaii: A History From Polynesian Kingdom to American Statehood*. Prentice-Hall, Inc., Englewood Cliffs.
- Malo, D.
1903 *Hawaiian Antiquities*. B.P. Bishop Museum Special Publication 2. Bishop Museum Press, Honolulu.
- Maly, K.
1994 Appendix B, Historical Documentary Research, in Franklin, L., K. Maly, and J. Head Archaeological Inventory Survey Kukuihaele Project (Amanresort At Kukuihaele), Lands of Kanahonua and Waiko'eko'e Hamakua District, Island of Hawai'i (TMK:3-4-8-06:8,9,11,13,43,44). PHRI Report 1408-061794 prepared for Kukuihaele Development Company, Hilo.
- Menzies, A.
1920 *Hawaii Nei, 128 Years Ago*. Edited by William F. Wilson. Honolulu: The New Freedom Press.
- Nelson, R.
1974 "Notes on Wire Landings Along the Hamakua Coast on the Island of Hawaii". *Hawaiian Journal of History*, vol. 8 138-142.
- Oliver, D.
1961 *The Pacific Islands*. University of Hawaii Press, Honolulu.

- Pogue, J.
1978 *Moolelo Hawaii*. Hale Paipalapala Aupuni, Honolulu (Revised Edition).
- Pukui, M., S. Elbert, and E. Mo'okini
1974 *Place Names of Hawaii. Revised and Expanded Edition*. Honolulu: University of Hawaii Press, Honolulu.
- Sinoto, Y., and M. Kelly
1970 Archaeological and Historical Survey of Pakini-Nui and Pakini-Iki Coastal Sites, Waiahukini, Kailikii, and Hawea, Ka'u, Hawaii. *Departmental Report Series 75-1*. Department of Anthropology, B.P. Bishop Museum, Honolulu.