



IN REPLY REFER TO:

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PLANNING DEPARTMENT  
COUNTY OF HAWAII

## United States Department of the Interior

NATIONAL PARK SERVICE

Ala Kahakai National Historic Trail  
73-4786 Kanalani St., Suite 14  
Kailua-Kona, HI 96740

August 7, 2008

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

RE: Early Consultation for Environmental Assessment for Ki'ilae Farms  
Subdivision, 8-5-006:001-029; TMK 8-5-005:019, South Kona, Island of Hawaii

Dear Mr. Terry:

Thank you for providing the National Park Service with the opportunity to submit comments to you during your preparation of a Draft Environmental Assessment for the Ki'ilae Farms Subdivision. The National Park Service (NPS) administers the Ala Kahakai National Historic Trail (NHT), added to the National Trails System by the U.S. Congress on November 13, 2000 (Public Law 106-509). The legislation authorizing the Ala Kahakai NHT identifies an approximately 175-mile portion of prehistoric *ala loa* and other trails on or parallel to the seacoast extending from Upolu Point on the northern tip of Hawaii Island down the west coast of the island around South Point to the east boundary of Hawaii Volcanoes National Park. The Ala Kahakai National Historic Trail combines surviving elements of the *ala loa* with segments of later *alanui aupuni*, which developed on or parallel to traditional routes, and more recent pathways and roads that created links between the historic segments. Natural and cultural resources and landscapes are vital to the mission of the Ala Kahakai National Historic Trail. Within Pu'uhonua o Honaunau National Historical Park/National Historical Landmark, the Ala Kahakai NHT route is on the "1871 Trail" or *alanui aupuni* which extends through the NHP following the coast and continuing along the entire western boundary of the Ki'ilae Farms Subdivision.

Potential impacts to the "Old Government Road" (Makai) or *alanui aupuni* were not considered within the Draft Environmental Assessment for Ki'ilae Farms Subdivision. Although this trail is not in the footprint of the proposed development it has the potential for severe impacts to the condition of the trail and the experience of the trail users if mitigating measures are not considered.



- Please address the visual impacts of the Ki'ilae Farm Subdivision on the Ala Kahakai National Historic Trail users.
- Please address how the Ki'ilae Farm Subdivision will mitigate potential vehicle access on to the *alanui aupuni*.

I appreciate this opportunity to provide our concerns. Please contact me, 808-326-6012 ext.101, or our resource staff archeologist, Rick Gmirkin, at ext. 102 to discuss any questions you may have on our comments.

Sincerely,



Aric Arakaki  
Superintendent

cc: C. Yuen, County of Hawaii Planning Department ✓  
Office of Environmental Quality Control  
NPS Pacific West Regional Office