



National Park Service  
U.S. Department of the Interior

2008 AUG 19 AM 10 18

PLANNING DEPARTMENT  
COUNTY OF HAWAII

Pu`uhonua o Honaunau  
National Historical Park

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## Pu`uhonua o Honaunau

August 14, 2008

Mr. Ron Terry  
Ki`ilae Estates LLC  
1885 Main Street, Suite 104  
Wailuku, Hawai`i 96793

RE: National Park Service Response to the Draft EA, Ki`ilae Farms Subdivision, Ki`ilae and Kauleoli,  
South Kona, Hawai`i Island, State of Hawai`i,

Dear Mr. Terry:

Please rescind and destroy the previous comments sent to you on August 7 regarding the above.

The Ki`ilae Farms Subdivision will have the potential to affect the park visitor experience and natural and cultural resources within the National Park. We have reviewed the DEA and provide the following comments.

### Park Viewscapes and Soundscapes

Viewscapes and soundscapes are important aspects of a visitor's experience at the Park. The area south of Alahaka Ramp to the Park's south boundary at Ki`ilae is considered "backcountry" which is widely understood as an area that is removed from developed areas. The subdivision lots located on the north side of the road that runs from Māmalahoa Highway to the cul-de-sac near the Old Government Road (Trail) abuts the Park's south boundary and could adversely affect the visitor's backcountry experience with farm and residential noises, artificial lighting during hours of darkness and an extreme change in vegetation patterns that could expose developed areas. Park visitors in developed areas will experience some of the same impacts as backcountry visitors but to a lesser degree.

The Park does acknowledge that the *Declaration of Covenants, Conditions and Restrictions for Ki`ilae Farms Subdivision* (CC&Rs) provides restrictions that are designed to reduce negative impacts to viewscapes as a result of lighting and landscape alterations. The CC&Rs also restrict the type and intensity of lights that are allowed for a reduced effect to the landscape views. It is noted that landscape alterations and improvements require a detailed site and landscape plan that must be reviewed and approved by the Design Review Board prior to implementation. The CC&Rs further attempt to limit the Subdivision's impact on the viewscape by limiting the elevation of structures to 30 feet.



The Visual Impact Assessment, Appendix 4, considers “areas of natural beauty and important viewplanes” as identified in the Hawai‘i County General Plan. The areas considered were Hōnaunau Bay and Scenic View from Ke Ala o Keawe Road, Kealia Beach and Ki‘ilae, utilizing nine conservative “sightlines” that account for maximum visual impact. While the photos and profiles were very effective at illustrating potential impacts to the above listed important viewpoints, none of the nine sightlines were useful to assess the impacts to viewscales from primary Park areas such as the pu‘uhonua, the Visitor Center or various points along the 1871 Trail (Old Government Road), as the sightlines originate from Māmalahoa Highway or Ke Ala o Keawe Road and do not assess the perspective of the park visitor. Due to the proximity of the Subdivision to the Park’s south boundary and the potentially higher density of agricultural lots at the five most makai lots that are intended to be subdivided into 22 agricultural lots, the potential for adverse impacts to the park visitor’s viewscales are inevitable.

The Subdivision will have adverse impacts to the park visitor’s viewscale and soundscape experience. Many of the above mentioned impacts could be mitigated even further by considering park values and visitor experience when reviewing landscape plans for approval and implementation for properties that will affect the park visitors’ viewscales and soundscapes. Buffers of vegetation can be effective at absorbing sound and light and maintaining visitor viewscales. In an effort to better understand any other considerations that might mitigate impacts to the park visitor experience, we would like to review a copy of the Subdivision’s CC&Rs.

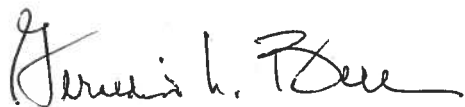
#### Protection of the Park’s Natural and Cultural Resources

The proximity of the Ki‘ilae Farms Subdivision at the Park’s south boundary could result in unintentional damage to park resources. People or animals could wander or explore beyond the north boundary of the Subdivision, over or through breaks in the rock wall that runs from the southeastern corner of the Park at Ki‘ilae to the southwestern end of the rock wall near the 1871 Trail (Old Government Road). Unintentional damage could occur as a result of people or animals (as associated with residential and agricultural activities) walking over the dry laid stone archaeological features. Dogs could hunt birds (most birds are exotic but do contribute to the park’s soundscapes) and cattle and goats could graze through Park areas. Park visitors could impact the natural and cultural resources as well but they are unlikely to wander into the interior of the Ki‘ilae extension as the exotic vegetation from the 1871 Trail (Old Government Road) can be impenetrable.

Fencing the north boundary of the Subdivision and south of the rock wall with appropriate National Park Service boundary markers could be effective at keeping the occasional animal from wandering into the Park and would notify people that the area north of the fence is National Park lands. Should a visitor manage to navigate into the interior of Ki‘ilae, the fence would in turn notify the person that the lands south of the fence is private property.

Thank you for the opportunity to participate in the environmental review process for this proposed project and to provide you with our comments and concerns. If you have any questions, please contact me at 808-328-2326 x1101, or Benjamin Barnette, Resource Manager, at extension 1401.

Sincerely,

A handwritten signature in black ink, appearing to read "Geraldine K. Bell". The signature is fluid and cursive, with a large initial "G" and a long, sweeping underline.

Geraldine K. Bell  
Superintendent

cc:

Daryn Arai, Hawai`i County Planning Department

Ron Terry, Geometrician Associates

Katherine Puana Kealoha, Office of Environmental Quality Control