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## United States Department of the Interior

NATIONAL PARK SERVICE

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

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U.S. DEPARTMENT OF THE INTERIOR  
NATIONAL SYSTEM OF PUBLIC LANDS  
CONSERVATION  
AND COASTAL LANDS

2009 SEP 10 A 8:16

September 4, 2009

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

Ron Terry, Principal  
Geometrician Associates, LLC  
PO Box 396  
Hilo, Hawaii 96721

RE: *DRAFT ENVIRONMENTAL ASSESSMENT, KEITH AND CYNDA UNGER SINGLE FAMILY DWELLING AND ASSOCIATED IMPROVEMENTS IN THE CONSERVATION DISTRICT. June 2009. TMK (3rd): 8-6-014:012 and 8-6-011:003 Kalāhiki, South Kona, County of Hawai'i, State of Hawai'i*

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 (DEA) for the Keith and Cynda Unger single family dwelling in Kalāhiki, South Kona.

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 was developed on or parallel to traditional routes, *mauka-makai* trails, and more recent pathways and roads that create links between the historic segments. Natural and cultural resources and landscapes are vital to the mission of the Ala Kahakai National Historic Trail.

The National Park Service thanks the applicant for recognizing elements of the Ala Kahakai NHT in the draft environmental assessment. In January 2009, the Ala Kahakai NHT Comprehensive Management Plan (CMP) and EIS were adopted as policy and listed in the Federal Register. The DEA (p. 24,25) was correct in stating that the maps in the Draft EIS were general. This was done intentionally. The exact route on the ground is yet to be determined for much of the 175 mile trail corridor.

### **Hazardous Substances, Toxic Waste and Hazardous conditions**

The shoreline area of Kalāhiki is an important resource for the *kuleana* lot owners and members of the community. Section 3.1.6 states that "the applicant will ensure" that "Construction materials, petroleum products, wastes, debris, and landscaping substances (herbicides, pesticides,

and fertilizers) will be prevented from blowing, falling, flowing, washing or leaching into the ocean”.

Please detail the applicant’s best management practices to prevent herbicides, pesticides and fertilizers from blowing, flowing, washing or leaching into the ocean during and after construction.

### **Cultural and Historic Resources**

Ala Kahakai National Historic Trail was established to administer the preservation and protect, reestablish as necessary, and maintain the ancient coastal *ala loa* and associated resources and values, along with linking trails on or parallel to the shoreline. The goal is to provide high quality experience, enjoyment and education guided by Native Hawaiian protocol and etiquette while protecting the trail’s natural and cultural heritage and respecting private and community interests. The 175 mile trail corridor includes those trails found within Kalāhiki.

According to our records there are at least three trails located within TMK 8-6-011:003 pertaining to the Keith and Cynda Unger Residence DEA. The three trails are the *ala loa*, or “old road” as described in the DEA which abuts the west side of TMK 8-6-014:012, the *alanui aupuni*, or government road, located on the upslope side of the cliff above the subject property, and a *mauka-makai* trail.

The “old road” appears on TMK map 8-6-014. On the “Map of Kauhako Landing and Vicinity”, Registered Map 893, created in 1883 by J.S. Emerson, the “old road” is referred to as a “trail”. This trail appears to have been a section of *ala loa*, altered through time to accommodate later forms of transportation. From Hookena this trail passes along the base of Pali Anihi, then makai of the *kuleana* lots in Kalāhiki, continuing further south along the shoreline. In Waiea, the next *ahupua’a* to the south, a portion of this trail retains prehistoric elements, including steppingstones.

The *alanui aupuni*, located above the Pali Anihi, is a lateral trail that connects Napoopoo, Honaunau, Hookena, Kalāhiki to lands south of the project area. This trail, between Kiilae and Waiea, has been abstracted by State of Hawaii, Division of Forestry and Wildlife, Na Ala Hele, and qualifies under the Highways Act of 1892.

References to the *mauka-makai* trail within Kalāhiki are found within the DEA.

The “old road” or *ala loa*, the *alanui aupuni*, and the *mauka-makai* trail are important trails within Kalāhiki. The preferred route for the Ala Kahakai National Historic Trail for travel from the Hookena side of Kauhako Bay to the Kalāhiki side of the bay would be the State abstracted *alanui aupuni* above Pali Anihi. This is the safest pedestrian route between these two points of land. The trail along the base of Pali Anihi is in disrepair, eroded by wave action and possibly by earthquake activity. The trail abutting the west side of the subject *kuleana* lot would be an excellent addition to the National Trail System, the inclusion of the *alanui aupuni* is critical to the safety of trail users.

Ala Kahakai NHT is looking forward to working with the landowners and communities of Kalāhiki, Hookena and greater South Kona to initiate managed access along this unique and fragile section of the Ala Kahakai NHT corridor.

I appreciate this opportunity to provide our comments. 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,

A handwritten signature in black ink, appearing to read "Aric Arakaki". The signature is fluid and cursive, with the first name "Aric" being more prominent than the last name "Arakaki".

Aric Arakaki  
Superintendent

cc: B. Leithead-Todd, County of Hawaii Planning Department  
State of Hawaii, DLNR, Department of Forestry and Wildlife, Na Ala Hele  
State of Hawaii, Office of Conservation and Coastal Lands  
State of Hawaii, State Historic Preservation Division  
Office of Environmental Quality Control  
NPS Pacific West Region