

Permitted Interaction Group Report and Recommendations
Koke`e and Waimea Canyon State Park Advisory Council
May 26, 2009

I. Introduction

At the April 2, 2009 meeting of the Koke`e and Waimea Canyon State Park Advisory Council (the “Council”), a Permitted Interaction Group (“Pua`a”) was appointed to do a close reading of the Pre-Final Master Plan and to report back to the Council with recommendations. The review was to include the EIS and all public testimony submitted in connection with the Draft EIS. ¹

The Pua`a submits the following information and preliminary recommendations based upon its review of the Pre-Final Master Plan and the public testimony:

II. Public Input and Overall Vision

From our review of the public input, including that presented at the April 2, 2009 meeting of the Council, the community passionately cares about Koke`e and Waimea Canyon State Parks and shares the following overall vision of a plan for the parks’ future:

The master plan must preserve and perpetuate the existing character of the parks by maintaining the area’s unique native ecosystems, vistas, trails and historic-cultural landscape by ensuring that public use does not compromise the integrity of the mountain’s natural resources, wilderness values, and intrinsic qualities.

- **Recommendation: This vision shall be stated in the Master Plan as the overall master plan purpose (1.1, remove “enhancement and development” language) and as the vision of the plan in section 6.4. ²**

Volunteers have begun to quantify the public testimony provided to us by the DLNR, a summary of which is attached to this report as Exhibit “A”.

III. Review of the Plan

A. Preferred Alternative Selection Overview. The Master Plan states that the evaluation begins with “a decision about fundamental park values.” *The alternatives “represent a range of development intensities, from ‘return to nature’ to maximum*

¹ The current EIS was not provided to the Council by DLNR or the consultant. They explained that the EIS contains exactly the same language that is contained in the Pre-Final Master Plan that is before us and that there is no additional detail or other information that could be gleaned from a review of the EIS.

² This vision is mandated by Hawaii Revised Statutes Section 164-6.

enhancement of built amenities.” The plan notes, “Each [of these values] places different emphasis on essential park functions of resource protection, recreation, education, and revenue generation.” (6-8)

We agree that selection of the master plan alternative is *critical*, as it will determine whether the mountain is developed or “enhanced” with additional “built amenities” and concessions or is, on balance, protected from such development and its natural resources, wilderness values, and intrinsic qualities preserved for future generations.

1. Pre-Master Plan Public Meetings: October 2003: Maintain Status Quo-the community’s choice. At a public meeting before the first version of the Master Plan was developed, the community was not permitted to vote on Alternative 1, “Maintaining Status Quo.” Of 145 attendees:

- Fewer than one-third voted (*over 100 abstained, opting to maintain the status quo*);
- Of the 42 who voted:
 - 36 voted for the Remedial Plan (many wrote a comment that the Remedial Plan was selected as the runner-up to "Alternative 1 - No Action");
 - 5 voted for the Conservation Plan; and
 - 2 voted for Alternative 4- the “enhanced” development plan.

2. 2004 Proposed Master Plan: Remedial Improvement Plan- The community’s back-up choice. The BLNR approved the objectives of Alternative #2 in November 2003. Therefore, the “preferred alternative” in the 2004 plan was represented as Alternative 2, the “Remedial Improvement Plan.” Despite the public testimony to the contrary, the master plan erroneously states that the public believed this alternative to be the favorable approach and further states that Alternative-1 (maintaining status quo) was considered by the public to be an *undesirable* approach.³ A stated fundamental goal of this 2004 version of the Remedial Plan is to “enhance revenue generation”.⁴

3. 2009 Pre-Final Master Plan: Enhanced Park Facility Development Plan- Rejected by the community. The current “preferred alternative,” Alternative 4, is now called the “Enhanced Park Facility Development Plan” (6-4).⁵ Table 6-1 shows, again *contrary to clear public input*, that the public testimony supported alternative 4 (enhanced development) as a “somewhat favorable approach” and that the public considers maintaining the status quo as an “undesirable approach.” Alternative 2 (remedial plan) is shown as being the alternative favored by the public as well as all other groups (6.5). The remedial alternative was not, in fact, supported as the preferred alternative by the public, but received more support than alternatives 3 and 4.

³ (See Table 6-1)

⁴ 6-12

⁵ The DLNR and the Consultant, R.M. Towill, have indicated that the current “preferred alternative” is no longer called the “Remedial Plan” because many of the elements of the various alternatives were cherry-picked and eventually “morphed” into this plan.

A stated *fundamental goal* of the current alternative, the Enhanced Park Facility Development Plan, is to “maintain existing resources and *enhance user facilities* and to *generate sufficient revenue* to sustain park operations.”⁶

We note that each of the Alternatives presented (including the “status quo” alternative) provide that the plan will *achieve sustainable operations with 35% of park revenues*; that is, the park must generate three times the revenue needed to run the park. As this goal is included in all plans, the public never had a choice on this aspect of the plan. We further note that all revenue generated within Koke`e and Waimea Canyon State Parks supports DLNR activities *statewide* and that the monies currently generated by Koke`e and Waimea State Parks are sufficient to sustain park operations here. The need to generate additional revenue is a statewide DLNR issue.

The 2009 plan suggests that “comments received from the public, interested parties, and DLNR staff members all provided a basis for the development of the [Enhanced Park Facility Development Plan]” (6.6), although the plan states that Alternative 2 [the Remedial Plan] was the plan most favored and “would be the thematic approach used for development of the Master Plan.” (6.5) The public comments are summarized in Exhibit “A” attached to this report. **It is our conclusion that the selected alternative, Enhanced Park Facility Development Plan, and its component elements do not align with public comments or concerns.**

4. Conclusion and Recommendations Regarding Preferred Alternative.

- Based upon public input, the community considers the “enhanced park facility development” approach undesirable. The public supports preservation and perpetuation of the existing character of the parks by restoring and maintaining existing park improvements, park utilities and infrastructure, and, most importantly, protecting fragile resources.
- We note that the nomenclature used in identifying the “preferred alternatives” is fluid. The names of the various alternative plans have changed over time.
- **We recommend the favored alternative to be identified as the “Remedial Plan” (not “Remedial Improvement Plan”) and that the plan identify its constituent elements clearly to avoid any ambiguous**

⁶ The Enhanced Facilities Development Plan vision includes “optimizing” recreational opportunities, “expanding” interpretive programs, “creating a destination” that “*enhances the wildland experience*,” etc. and its objectives include “enhancing park identity” through signage, “focusing development at lookouts and along the roadway corridor between Pu`u ka Pele and Kanaloahuluhulu Meadow,” “constructing a visitors center,” “developing ‘satellite’ interpretive facilities at lookouts and trail hubs,” “developing tours around themes,” “expanding concession and management leases,” “developing the lodge area as a ‘main street’.. with new [and separate] Park HQ, Lodge and Education Center buildings... served by storefront parking,” “establishing revenue enhancement program including entry fee and improved concession facilities at lookouts and Kanaloahuluhulu.”

references to expanded commercial activity, development or potential development (including “enhance” “improve” “repair” “rebuild” and “redevelop” if not clearly defined in context) within the parks.⁷

- We recommend that the plan consistently use one name to reference the preferred alternative throughout the document.⁸
- The historic public input with respect to the various alternatives should be accurately reflected in the plan, including 1.2 on page 1-4, 2.1, 6.5 and Table 6-1 on page 6-8, and Table 6-2 on page 6-9. See Exhibit “A” and discussion under III(A)(1), above.

B. Objectives of the Master Plan.

1. Revenue Generation vs. Protection and Conservation. The fundamental (stated and inferred) goal of many of the proposals contained in the 2004 and 2009 versions of the Master Plan is revenue generation (for DLNR projects statewide). These projects include entry fees (with a gate and/or station), additional commercial activities including permanent and expanded concessions at lookouts, and expanding existing concessions to an undefined extent. While we understand the DLNR’s need to financially support its massive land and water assets statewide, we believe that the fundamental goal of state parks management of Koke`e and Waimea Canyon must be to “*preserve the parks... in their natural condition* so far as may be consistent with their use and safety” and to “*retain to a maximum extent the natural, scenic, historic and wildlife values*”⁹ of these fragile parks. Raising revenue to maintain these and other parks across the State of Hawai`i must not be the overriding goal of our master plan.

2. Recommendations. **We recommend that the following clear objectives be included in the Master Plan and expressly guide and govern interpretation of all Master Plan elements:**

- Restore, maintain and/or repair park utilities and infrastructure.
- Protect, preserve, and cautiously manage archaeological resources, historic sites and traditional cultural places within Koke`e and Waimea Canyon

⁷ Examples of vague and ambiguous references to development include proposals for “development at lookouts and along roadway corridor” (6-5), development of “‘satellite’ facilities at lookouts and trail hubs,” expansion of “concession and management leases,” establishing “revenue enhancement programs, including improved concession facilities at lookouts and at Kanaloahuluhulu.” (6-7). The plan urges “the renovation.... or construction of new facilities in Kanaloahuluhulu Meadow and CCC Camp” in order to “enhance the Park’s identity...” (6-11) “Several primary destination sites within the parks are identified for more intensive redevelopment” (7.1). “Parking lots at Kanaloahuluhulu Meadow and at all the lookouts need to be expanded” (3-48)

⁸ The current plan uses many names to reference the chosen plan. For example, Park Enhancement Plan (Table of Contents, Figure 6-4), Enhanced Park Facility Development Plan (Chapter 1, 1-4, and 6.4), and Remedial Improvement Plan or alternative (7.1)

⁹ Hawai`i Revised Statutes Section 184-6

State Parks, and ensure the continuity of the traditional cultural values and practices that are unique to these parks without commercialization.

- Protect and restore the native flora, fauna, and habitats in the parks and surrounding natural areas.
- Remove invasive flora species.
- Protect and preserve significant historic and cultural sites and activities within the parks.
- Preserve scenic mauka and makai natural landscapes and vistas along the roadway leading to and through the parks, including geological features and forests.
- Keep the Kanaloahuluhulu meadow area free of further development, such as expanded parking areas or new buildings that will require additional parking.
- Keep all improvements at Kanaloahuluhulu meadow within existing footprint and single-story with limited exceptions as discussed under III(C)(1), subject to concept and design approval by the Kōke`e and Waimea Canyon State Parks Advisory Council.
- Provide adequate staffing, equipment and supplies for quality restoration and ongoing maintenance of the parks' trails, facilities, infrastructure and natural resources.
- Maintain and support Kōke`e Natural History Museum as the primary interpretive site for the parks.
- Keep all lookouts free of concessions and retail services.
- Assure that no commercial signage will be allowed within the parks and ensure that all directional signage within the parks is unobtrusive, limited in number, and low profile.
- Maintain existing roadways to provide a natural scenic corridor and slow traffic by limiting road width.
- Conduct lease dispositions to maximize stewardship, access to accommodations, historic preservation, and cultural use by Kaua`i residents. Current leases to non-profits should not be converted to commercial ventures.
- Find alternative revenue sources to provide ongoing support for the operations of Kōke`e and Waimea Canyon parks so that the future funding of park operations is not dependent upon promoting commercial activities within the parks.
- Work with Hui o Laka, Kōke`e Leaseholders' Association, and other groups to develop volunteer programs for park maintenance and restoration projects. Provide volunteer housing and other incentives to encourage volunteering in the parks.
- Refrain from utilizing such artifices as uniformed rangers, entry station, signage or national park-like themes to create or reinforce an extraneous "park identity" for Kōke`e.
- Management decisions shall be on conservation values rather than developed recreation, commercialization and/or privatization of park

resources.

- All decisions related to the design, size and location of built improvements within the parks must be brought to the Koke`e and Waimea Canyon Advisory Council for approval and the State must not give its right to development latitude and design control to a concessionaire.

C. Specific Proposals and Projects

1. Kanaloahuluhulu Meadow. The Meadow area is the heart of Koke`e and the community is fervent in its opposition to development of the area.

a. Features of the Pre-Final Master Plan affecting the meadow area include:

1. Expand parking lot at Kanaloahuluhulu Meadow (3-48);
2. Develop lodge area as a ‘main street’ layout with new Park HQ, Lodge, and Education Center buildings separated by landscaped spaces, and served by store-front parking and covered boardwalk connection;
3. Establish revenue enhancement program, including entry fee and improved concession facilities at lookouts and Kanaloahuluhulu” (6-7);
4. Develop a new Visitor Service Center with new Park HQ and renovated lodge and museum buildings (6-14);
5. Explore the possibility of creating a lodge with short-term rentals at Kanaloahuluhulu Meadow (7-19);
6. Develop new cabins and/or a lodge complex to provide additional short-term rental capacity to meet existing demand;
7. New lodging may be incorporated into existing park buildings;
8. Move existing historic Park Headquarters building located at the entry to the meadow (Photo 7-10, page 7-6) down the mountain to be used as a support building (a place for “personnel to relax”) at the entry fee station (7-20 directs that the “vacated space” be in-filled with new orchard plantings).
9. Most of these proposals are vague and open to a wide range of options.
10. The cost projected for these Kanaloahuluhulu Meadow/Park HQ capital improvement projects is estimated as approximately \$4.5 million. (Table 7-9)¹⁰

b. **Recommendations:**

- **Overall: Maintaining the existing character of the meadow and its facilities is critically important to the overall plan.** Keep the meadow untouched and free of further development, such as expanded parking areas or new buildings that will require additional parking. Keep all improvements at Kanaloahuluhulu meadow single-story and similar in size, scale and design to existing structures, with the limited exception of the museum building as discussed below, and subject in each case to

¹⁰ Compare 7.7, which estimates \$28.3 million for master plan improvements.

concept and design approval by the Koke`e and Waimea Canyon State Parks Advisory Council with public input.

- No New Park Visitor Center/ Revive Historic Park HQ. The master plan includes an additional building called a Park Visitor Center to be built at the meadow.¹¹ The stated purpose of this building is to issue park permits, reservations for state rental cabins, complaints, reports and emergency communications and visitor orientation.(1-7) The plan proposes that the center use audio-visual programs, exhibits and displays to “orient visitors to the parks and show the resources and history of the parks.” (6-7).¹² We find that there is no need to build a Park Visitor Center. The functions of issuing park permits and communications can be accommodated in the existing historic Park Headquarters building. Staff at the Koke`e Natural History Museum currently disseminate information about the parks and the exhibits and displays are appropriately housed and managed in the existing museum building.
 - **We recommend that the existing historic Park Headquarters remain in place and be used as a Park Headquarters for issuance of park permits and related DSP needs. Basic safety information can be dispensed as brochures or verbally and visitors would be referred to the museum for other interpretive exhibits, maps and books.**
- No Short-Term Rentals at the Lodge or within Kanaloahuluhulu Meadow Area. The plan suggests the “possibility of creating a lodge with short-term rentals”(1-7, 7-19), development of a “lodge complex” or “incorporated into existing park buildings” (1-7 and 7-22). The public responded with nearly universal dismay to the lodge/hotel project included in the Draft EIS issued in 2006.
 - **We recommend that there be no short-term rentals at the lodge (or anywhere within the Kanaloahuluhulu Meadow area) and that any additional short-term rentals be similar in design and scale to existing State Rental Cabins and sited only within the area currently used by the existing state rental cabins.**
- Limit renovation, repair or replacement of existing buildings at the Meadow. The plan calls for many “new” buildings at the meadow, described variously as “new Park HQ, Lodge, Education Center, improved

¹¹ It is interesting to note that this “New Park HQ/ Visitor’s Service Building” even appears in Alt 3: the “Limited Access/Conservation Plan” alternative. (6-5)

¹² See also, 7-10. The Park Visitor Service Center will provide “interpretive displays of the parks’ overall natural and cultural resource context, recreation opportunities, and visitor education.” This is the role of the museum and would detract from and duplicate the efforts of the Koke`e Natural History Museum and Hui o Laka.

concession facilities, new Park Visitor Service Center, lodge with short-term rentals, etc.

- **We recommend that any proposed renovation or reconstruction of existing buildings at the meadow meet the following criteria:**

(1) There will be no new buildings and the renovation or replacement/ reconstruction of existing buildings will be limited in scope and scale such that no additional parking will be required by the construction;

(2) Prior to renovation or reconstruction, proposed design and siting will be presented to the Council for public input and Council approval consistent with Koke`e vernacular architectural guidelines;

(3) If deemed appropriate and needed in order to consolidate new interpretive displays to avoid reliance on lookout and trail signage, add a small wing to the northern end of the museum similar in scale to the “weather display” room.

- Maintain Current Traffic Flow/ No T-Intersection. The plan suggests, “Realign road at entrance to Kanaloahuluhulu Meadow *to direct traffic to the lodge and museum area. Create a T-intersection.*”¹³ Realigning the road to direct traffic into the lodge area will create additional, unnecessary congestion and stop traffic at the T-intersection.

- **We recommend that the road entrance to the meadow remain as it is currently configured in order to limit unnecessary traffic at the meadow.**

2. Concessions. Under the Enhanced Park Facility Development Plan and its emphasis on *revenue generation*, expanding the number and size of concessions is clearly a paramount objective. (6-5)

The plan provides for concessions at lookouts and expansion of other concessions and commercial leases. It also notes that the Waimea Canyon Lookout “is the most profitable concession location in the park” (3-38) and that DSP has “allowed a private concessionaire to operate a lunch wagon at this location,” selling refreshments, sandwiches, post cards, and small souvenirs. The current plan calls for the lunch wagon to be replaced by a “Visitor Information Center Concession Building” with expanded, ADA accessible restroom (Figure 7-5). This Tourist Shop will sell souvenirs and snacks and have room for interpretive displays and an information center. (7-23) The public has

¹³ 7-22 under Utilities and Infrastructure

consistently stated its opposition to concessions at any lookouts and objects to any such permanent commercial intrusion within the parks.

- **We recommend that there be an absolute prohibition on concessions at lookouts. Allow current concession contracts with concessionaires at lookouts to expire.**
- **Any other proposed new concessions (beyond existing lodge, cabins, museum) must be brought to the Council for public input and Council approval.**

3. Entry Fee-Station-Gate/Road Widening/Support Building/Parking Lot. The entry fee and station is included as “an essential component” of each of the alternatives. The plan states that there are several reasons for the station, but it is clear that its central place in the DLNR plan is purely economic. Establishing an entry fee “offers the single, most straightforward source of revenue for the park.” (7-35) The plan uses \$2 per person and \$5 per vehicle to estimate the potential gross revenues in excess of \$850,000 and net revenue of approximately \$725,000. **The suggestion that the entry fee gate will “remind visitors that they are entering sacred ground” is offensive and disingenuous and such language should be removed.**

a. Issues

1. Rationale for Fee. The stated rationale for charging a fee is “to fund park operations and maintenance” (7-10), however even at present not all of the revenue generated in the parks is necessary for their operation. This is a means to raise money for DLNR expenses statewide. The public has objected to having money raised by charging a fee to enter the park deposited in a statewide fund with no requirement that this money be used for Koke`e and Waimea Canyon needs.
2. Structures. The plan for the entry fee “station” includes the following permanent facilities to be placed in the road and roadside at the 6.9 mile mark:
 - Entry Station. A building of a *minimum of 100 s.f.* (7-11), placed on an elevated median strip with traffic crash barriers. Assuming this is a 10’ x 10’ building, this will create another lane-and-a-half of road widening in addition to the 3-lanes proposed. Figure 7-2 fails to show the station.
 - Support Building. A building of approximately 550 s.f. to be constructed at roadside with space for “personnel to relax and be comfortable.”
 - Parking lot. A minimum of 4 parking spaces, including one ADA van-accessible space, with room for the vehicles to back out of the spaces without entering the lane.

- Three lanes of traffic. Two incoming lanes: one for “paying visitors” and one with a card-activated gate for residents, park staff, service employees. One lane heading down the mountain “with a back up prevention device.”
3. Location of Entry Station. The station is to be placed at 6.9 miles, just after the junction of the road from Kekaha and Waimea Canyon Drive. Any back-up of traffic caused by the entry gate will cause serious congestion for both roads. Buses and cars will be idling as we wait to get through the area, detracting from what is now an extremely pleasant ride up the mountain.
 4. Implications of transfer of road to DSP. Currently, the road is under the jurisdiction of the Department of Transportation and no fees can be collected on DOT roads. Therefore, in order for the DLNR to collect an entry fee, the Department of State Parks proposes that the DOT transfer jurisdiction of the roads to DSP. The history of repair and maintenance of roads within the parks that are currently under DSP jurisdiction is woeful. There are additional proposals in the plan that suggest that DSP “develop”, “improve” and “enhance” the road as a “scenic resource” with additional lower elevation lookouts all the way down to Waimea town.¹⁴ There is the additional issue that there will be re-routing of traffic up from Waimea, with adverse effects on Kekaha businesses.

b. **Recommendations:**

- **As the revenue generated by Koke`e and Waimea Canyon State Parks currently exceeds their operating expenses, there is no need for an entry fee and therefore no need for an entry station.**
- **Explore other avenues of revenue generation statewide that will not have such a significant impact on our mountain roadway and our experience of entering Koke`e.**¹⁵

¹⁴ See 7-13, Park Expansion 7-30 and Lower Waimea Canyon Viewpoints 3-40. Nine sites from Waimea Town to the entry station are identified as “suitable for developing lookout facilities.”

¹⁵ We have been informed that regardless of any other plans for Koke`e and regardless of public sentiment or the opinion of this Council, the DLNR will build an entry fee station.

- If there is to be an entry fee, *100% of such fees should support Koke`e and Waimea Canyon State Parks.*
 - If there is to be an entry station, it should be of *small scale*, no wider than 7’ but with enough room to house a bathroom and two windows.
 - If there is to be an entry station, there should be *no support building or parking lot.*
 - If there is to be an entry station, to avoid having a gate for local traffic, we recommend that there either be *only one entering lane or that the station be situated between the two incoming lanes with windows on each side.*
 - If there is to be an entry station, it should be *situated at the entrance to Waimea Canyon*
- Lookout to:* 1) avoid the traffic problems that would occur at the junction of Koke`e and Waimea Canyon Roads and 2) limit the roadway that would be transferred to DSP management.

- **Any expansion of Waimea Canyon State Park shall be solely for the purpose of preserving scenic natural landscapes and vistas along the roadway leading to and through the parks by avoiding development in or on the roadways, including new lookouts.**
- **Limit roadway width to 18’.**

4. Trails. The plan proposes creating ‘satellite’ interpretive facilities, toilets and hubs at trailheads and “informational and interpretive signage throughout the trail system to orient and educate hikers”.

- **We recommend that there be minimal unobtrusive directional signage to identify trails (standard Na Ala Hele signs), but no exhibits, interpretive displays or facilities, toilets, hubs, etc. Restore and maintain trails.**

5. Trailhead Parking.

Under the master plan, the Water Tank Trail is to have parking for up to 45 cars at the entrance to the Discovery Center. **We recommend that this area provide graveled parking for 5 to 10 vehicles.**

Under the master plan, the Kaluapuhi Trail is to have a 50 car parking lot, composting toilet, and directional signage across from Awa`awapuhi trailhead. **We recommend that this area provide graveled parking for 5 to 10 vehicles.**

6. Interpretive Signage. Virtually everything we experience, see, and touch up the mountain could be “interpreted” through signage. Cultural issues, historical background, environment, safety, ecosystems, place names, geology, view planes, landmarks, etc. are all topics that could be the subject of interpretive efforts. The master plan identifies many more. The result is signage in-situ, which becomes a target for vandalism and often interferes with the experience of being in nature. This information is included in books for those who are interested.

- **We recommend that we support and expand the interpretive efforts of Koke`e Natural History Museum rather than using in-situ signage. All signage should be unobtrusive and kept to a minimum.**

IV. CONCLUSION

We have taken a close look at what has been presented to us as a *Final* Master Plan and we have been further informed that the consultant’s contract is finished. It is our understanding that few significant changes can or will be made by the DLNR or R.M. Towill, the consultant. Nevertheless, we feel compelled to urge reconsideration or, if DLNR is not willing to rewrite it in partnership with the community, that the BLNR not

approve it. The public comments throughout the master planning process appear to have been largely discounted or ignored and, unfortunately, this has resulted in a master plan that is in need of much thoughtful revision.

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