



**Ka 'Ohana O Kalaupapa
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Coordinator and Secretary

June 8, 2015

Erika Stein Espaniola, Superintendent
Kalaupapa National Historical Park
PO Box 2222
Kalaupapa, Hawaii 96742

Dear Erika,

The Board of Directors of Ka 'Ohana O Kalaupapa thanks the National Park Service for recognizing the importance of creating and implementing a General Management Plan for Kalaupapa National Historical Park. We trust that the Park Service will seriously consider our comments that are listed below. We believe our recommendations will make the plan stronger and more inclusive.

Ka 'Ohana O Kalaupapa is a nonprofit organization made up of Kalaupapa residents, family members and longtime friends. Since we organized in 2003, our President has always been a Kalaupapa resident – first Kuulei Bell and now Boogie Kahilihiwa. We have two other Kalaupapa kupuna on our Board as well as seven family members and two longtime friends. Eight of our 12 Directors are Native Hawaiians. Our mailing list now includes more than 1,200 individuals.

The 'Ohana continues to support the Position Paper we submitted to the Park Service in 2009 following the first round of public hearings – as well as the comment letter we submitted following the second round of hearings in 2011.

We trust that the project leaders of the GMP will reach out to Ka 'Ohana O Kalaupapa when preparing the revisions to give the 'Ohana its due recognition and include language that recognizes the 'Ohana as a long-term partner already in charge of certain programs related to Kalaupapa.

The 'Ohana is also concerned about how the final plan will be determined – what is the decision-making process of the NPS? As you have heard, members of the public have expressed frustrations that they have been involved in the GMP process since 2009 or after and yet they feel their voices have not been heard. What weight do public comments carry as opposed to the opinions of the NPS administration, most of whom are located outside of Hawai'i?

These are our comments about the proposed General Management Draft issued in April, 2015:

There is little mention of Ka 'Ohana O Kalaupapa. It is quite disappointing that there is barely any mention of Ka 'Ohana O Kalaupapa in the GMP considering all that the 'Ohana has done in the past 12 years in advocating for the Kalaupapa community, assisting family members in learning about their ancestors, developing educational programs and public presentations that have been traveling around the islands for the past few years and working for preservation of

this important history. The 'Ohana also has been assigned a house at Kalaupapa by the Department of Health for use as a headquarters and future museum to honor the wishes of Bernard Punikai'a. The 'Ohana should be included as a long-term partner in the GMP and be given credit for the many improvements and programs we have made possible. It's also disappointing that the Position Paper we submitted in 2009 to NPS is not even included among the several plans and documents used to prepare the GMP – it is simply referenced. Our Position Paper was written with the input of the Kalaupapa community and endorsed by the Board of Trustees of the Office of Hawaiian Affairs and now-Senator Mazie Hirono among others.

The plan fails to recognize the programs developed by the 'Ohana while proposing that the NPS duplicate them using taxpayer money. NPS is now proposing to develop programs to reach out to the families of Kalaupapa and schools, conduct public presentations and create exhibits – projects already created, funded and made highly successful by Ka 'Ohana O Kalaupapa. Several years ago, the 'Ohana saw the need for this outreach and we have since reached thousands of students, family members and other members of the public across Hawai'i. Our "Restoration of Family Ties" program has helped more than 500 families reconnect with their ancestors – we have information on more than 7,200 people sent to Kalaupapa in our digital library from our research of public archives. Three of our programs have been presented with Preservation Awards by the Historic Hawai'i Foundation.

Since 2011, we have visited almost every island at least once a year – except Ni'ihau -- and most of those islands we have visited more than once a year in our efforts to seek out more families and provide the public with an opportunity to hear about our work. Our schools outreach program has grown to the point where we now have a team of Hawaii educators beginning to work on curriculum on how to include the history of Kalaupapa in classrooms. Our traveling exhibits have appeared at UH-Manoa, six community colleges, museums, public places and we are now going into the high schools. The 'Ohana hopes that the NPS would support these programs already developed and being conducted by the 'Ohana and not use taxpayer money for duplicate purposes.

The Kalaupapa Memorial is barely mentioned in the 325-page plan. The Kalaupapa Memorial is barely mentioned in the GMP and we believe it will be the most significant addition to Kalaupapa over the next several years. The Memorial should be included as a project common to all alternatives.

In addition there are two serious mistakes about the Memorial that need to be corrected in the final GMP. On Page 37, it states that the Memorial will be located "near" the former Baldwin Home for Boys. This is not correct – it will be located within the rock walls of the former Baldwin Home which is now open space. This has been the preferred location of Kalaupapa residents for many years. The second error is on page 226 where it states the legislation passed by Congress and signed into law by President Obama authorizes the 'Ohana to "install" the Memorial. Again, this is not correct. The law authorizes the 'Ohana to "establish" the Memorial which we are doing – we will build the Memorial and lead the operations and maintenance. These corrections need to be made to the final GMP.

We do not support the proposed boundary amendments where NPS would acquire lands within Pelekunu and Halawa valleys. When Kalaupapa National Historical Park was established in 1980, it was at the invitation of the people of Kalaupapa to preserve their lifestyle and the important history at Kalaupapa. It appears these new lands could

be the start of the North Shore National Park where recreation could be emphasized rather than the human history of Kalaupapa. The draft GMP states that the current NPS staff at Kalaupapa would be responsible for managing this additional 12,000 acres. Considering that the NPS had to furlough staff in the summer of 2014 because of economic cutbacks, we believe that the programs at Kalaupapa could suffer if staff is also responsible for these additional lands.

We also believe that the proposal for the NPS to take over these lands has a direct impact on all the people of Molokai. It is disappointing that it appears that the NPS has already been involved in serious discussions with the landowners about obtaining these lands, but without public input until now. The comments of residents of Kalaupapa and upper Molokai need to be carry additional weight in the final decision to acquire these lands.

More serious discussion need to take place with the beneficiaries about homesteading in the future at Kalaupapa. There still seems to have been little discussion about homesteading at Kalaupapa other than meetings with officials (we are aware of the meeting held last month with beneficiaries on upper Molokai). The NPS currently has a lease for approximately 1,300 acres of Hawaiian Homelands that make up the ahupua`a of Kalaupapa – this lease expires in 2041. For the past 11 years, the 'Ohana has been encouraging NPS and DHHL to have discussions about the future not only with DHHL officials in Kapolei, but with the beneficiaries, those who have lots and those on the wait list. These discussions – not lip service -- simply must happen or people will feel left out when a decision is made. One meeting every few years is not sufficient.

If homesteading is allowed, can preference for homesteads be given to descendants of those sent to Kalaupapa because of government policies regarding leprosy and/or the kama`aina who were there when the settlement was started? These individuals would carry on the legacies of their ancestors in the very place where they lived.

In addition, the 'Ohana continues to support our 2009 Position Paper where we stated that we oppose any land exchange between the Department of Hawaiian Homelands and the NPS or any other federal agency for the land at Kalaupapa.

A cap for visitors must be set. There is no set number for visitors allowed at Kalaupapa per day in Alternatives C and D – although during public hearings held in May, 2015, NPS officials stated that there was a “facility capacity” of about 300 persons per day at Kalaupapa. This is a dangerously high number that could destroy any preservation efforts at Kalaupapa.

As we all know, there is currently a limit of 100 visitors a day – this number was determined by the Kalaupapa community. In the future, there must be a set number of visitors. The visitor cap should be reviewed annually. Too many visitors at Kalaupapa will quickly ruin the special feeling one gets of being on sacred ground. In the Position Paper submitted in 2009, Ka 'Ohana O Kalaupapa recommended that when there are no longer individuals who were once isolated under the old laws living at Kalaupapa, there should be a limit of 150 day-only visitors with a limit of 25 overnight visitors. These numbers should also be reviewed annually – and lowered, if necessary, to protect the resources. The 'Ohana also recommended that family members be given preference for visitation.

There still seems to be an emphasis on visitors, but little mention of family members or Native Hawaiians. As we started in our 2011 comment letter, family members should

not be considered visitors in the land of their ancestors and Native Hawaiians should not be considered visitors in their own land. Preference to visit Kalaupapa should always be given to family members and Native Hawaiians.

As we stated in our 2011 comment letter, Native Hawaiian access rites must be recognized. We do not see this addressed in any of the alternatives – Native Hawaiian access rites should be common to all alternatives. Some Hawaiians have expressed interest in growing kalo in Waikolu Valley or having access to other parts of the Makanalua peninsula for agricultural purposes, gathering rites and spiritual practices. These proposals have merit and should be pursued with ongoing discussions on how to allow this access without destroying the resources or sacred feeling of Kalaupapa.

Kalaupapa will always be a place – not a park. It is troubling that the NPS continually references Kalaupapa as “the park.” To many of us who have been connected to Kalaupapa for many years, Kalaupapa is a community and the home or final resting place of ancestors and loved ones. Kalaupapa National Historical Park has certainly become an important part of Kalaupapa, but Kalaupapa is not -- and will never be -- “a park.”

Members of Ka 'Ohana O Kalaupapa – and others from the public -- should be allowed to fill vacant seats on the Kalaupapa National Historical Park Advisory Commission. The application process to the KNHP Advisory Commission should be posted on the KHNP website so more individuals are aware of any vacancies – and how they can apply. If Kalaupapa kupuna are no longer able to serve on the Commission or if there are other openings, family members and Native Hawaiians should be given first preference to fill any vacancy.

A Kalaupapa Task Force of interested parties should be created. This idea was suggested by Native Hawaiians on upper Molokai who have an interest in the future of Kalaupapa. There are many organizations involved at Kalaupapa in addition to the descendants of the kama`aina and those sent to Kalaupapa along with the Native Hawaiians on upper Molokai. A Task Force with representatives of all of these voices should be established so plans can be discussed with public input.

Ka 'Ohana O Kalaupapa should be consulted on decisions that will be made when there is no longer a living community of those who were sent there under the isolation laws – this is the land many of us or our ancestors called home. The 'Ohana should be an acknowledged voice in decision-making, especially on such key issues as those listed above.

While this GMP was 325 pages long with many more pages attached, none of the written public comments received since 2009 were attached. All written comments, including the Position Paper of Ka 'Ohana O Kalaupapa, should be part of the final GMP in both electronic and print form. These comments will be an important part of the record for future reference.

We appreciate the opportunity to offer our concerns and recommendations. If you have any questions or would like to review any revisions, please contact our Coordinator, Valerie Monson, at vmonson@kalaupapaohana.org or 808-573-2746.

Ka 'Ohana O Kalaupapa hopes that our comments are helpful and we hope the National Park Service will accept additional comments that might arise at a later date and continue these discussions. We look forward to working with the Kalaupapa

community, the National Park Service and other interested parties in the future to preserve this important place and present the history of the people of Kalaupapa in the way they want to be remembered.

Mahalo nui loa,

A handwritten signature in black ink, reading "Clarence 'Boogie' Kahilihiwa". The signature is written in a cursive, flowing style with a large, stylized initial 'C'.

Clarence "Boogie" Kahilihiwa
President