



January 13, 2022

VIA EMAIL
State Historic Preservation Division
dlmr.hp.preservationplan@hawaii.gov

Re: Comments of KAHEA: The Hawaiian-Environmental Alliance on development of the 2022-27 Statewide Historic Preservation Plan.

PROTECTING

To whom it may concern,

NATIVE HAWAIIAN

CUSTOMARY &

TRADITIONAL RIGHTS AND

OUR FRAGILE

ENVIRONMENT

KAHEA: The Hawaiian-Environmental Alliance, a 501(c)(3) nonprofit organization provides the following comments on the State Historic Preservation Division's (SHPD)'s plans to update the statewide Historic Preservation Plan (Plan). KAHEA is a community-based organization working to improve the quality of life for Hawaii's people and future generations through the revitalization and protection of Hawaii's unique natural and cultural resources. We have been advocating for the protection of Mauna Kea for nearly the entire life of our organization, which was founded in 2000.

The Plan should include the following as a goal, objective, and action: the designation of the entirety of the Mauna Kea from the 6,000 foot elevation to the summit under all significant criteria and as a traditional cultural property (TCP) for the state and National registers. A TCP is a classification used by the National Register of Historic Places that recognizes that a site may have traditional cultural significance because of its association with "cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community."

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Policies for Plan development

The statewide historic preservation plan is required pursuant to U.S. National Historic Preservation Act, §101(b)(3)(c), which is administered by the U.S. National Park Service (NPS). The relevant NPS policy is provided under chapter 6 §G of the Historic Preservation Fund Grants Manual. *Id.* at 6-8 to 6-13. Goals and objectives should be responsive to identified resource needs, feedback from stakeholders, and issues, threats, and opportunities. *Id.* §G.2.b.4.b. Additionally, objectives should include actions that

KAHEA: the Hawaiian-Environmental Alliance is a non-profit 501(c)3 working to protect the unique natural and cultural resources of the Hawaiian islands. KAHEA translates to English as "the call."

may be accomplished within the life of the plan and are measurable.

TCP Designation of Mauna Kea is a needed 2022 goal, objective, & action.

It has been nearly a quarter of a century since, SHPD determined the Mauna Kea Summit Region to be eligible for listing in the National Historic Register in 1999.¹ At that time, SHPD “indicated that they will be proposing a historic district designation for the summit region of Mauna Kea which they believe will meet the eligibility criteria for inclusion in both the Hawaii State and the National Register of Historic Places.”²

Mauna Kea was not only going to be included in the state and federal registers for historic significance, but also as a TCP. SHPD determined three specific summit features met the criteria for designation as TCP. CRMP at 2-40. However, Dr. Thomas King, who is credited with developing the concept of the TCP, has opined the entire upper slope region of Mauna Kea meets the eligibility criteria for inclusion in the National Register as a TCP (King 2003: 6-7). State and federal documents recognize pervasive opinions that all of the lands above the 6,000 foot elevation should be recognized as a TCP.³

For more than a decade the University of Hawai‘i, the sublessee of Mauna Kea lands, and in its plans reviewed and approved by the state Board of Land and Natural Resources annually, has repeatedly affirmed that it will support an application for designation of the Mauna Kea summit as a TCP.⁴ The University is but one of dozens of entities and thousands of stakeholders who have identified the need to protect Mauna Kea as a historic, cultural, spiritual, religious, and archaeological resource.

For these reasons, TCP designation of the Mauna Kea from 6,000 foot elevation to the summit is responsive to identified resource needs and feedback from stakeholders. Inclusion of this goal, objective, and action is further responsive to issues, threats, and

¹ P. McCoy, S. Collins, S. Clark, and V. Park, Pacific Consulting Services, Inc. “A Cultural Resource Management Plan for the University of Hawai‘i Management Areas on Mauna Kea Ka’ohe Ahupua’a, Hāmākua District, Island of Hawai‘i TMK: (2) 4-4-012, 015: A Sub-Plan for the Mauna Kea Comprehensive Management Plan,” prepared for Office of Mauna Kea Management (Oct. 2009).

² PHRI, Cultural Impact Assessment Study, Native Hawaiian Cultural Practices, Features, and Beliefs associated with the University of Hawai‘i Mauna Kea Science Reserve Master Plan Project Area, Report 1876-040199, prepared for University of Hawai‘i-Institute for Astronomy, at PDF35 (1999).

³ “Ka Mauna a Wākea or Mauna Kea, also referred to as ‘Ka piko kaulana o ka ‘āina’ (The famous summit or center of the land)” is “[g]enerally described as the mountain region from approximately the 6,000 foot elevation to the summit. Described as a sacred landscape that is a physical and spiritual connection between one’s ancestors, history, and the heavens.” PHRI, Cultural Impact Assessment Study, Native Hawaiian Cultural Practices, Features, and Beliefs associated with the University of Hawai‘i Mauna Kea Science Reserve Master Plan Project Area, Report 1876-040199, prepared for University of Hawai‘i-Institute for Astronomy, at 35 (1999); (NASA 2005: xv).

⁴ University of Hawai‘i, Maunakea Comprehensive Management Plan Draft Outcome Analysis Report (draft), Comprehensive Management Action MEU-1, at PDF 26, Apr. 30, 2021 (Cultural Resource, CR-2).

opportunities. Fragmented, project-by-project review of proposed land uses of Mauna Kea risks missing the area's larger cultural, spiritual, and religious landscape.

The 2012-17 Plan identified TCP designation as an issue, action, & opportunity.

The 2012-2017 Statewide Historic Preservation Plan (2012 Plan) recognized "[t]he need for ongoing efforts to add sites to the state inventory especially . . . traditional cultural properties[.]" *Id.* at 20. Objective and action No. 3.3 was to "[c]onduct a pilot project to submit a [TCP] to the State Register and the National Register of Historic Place [*sic*]." *Id.* at 28. The 2012 Plan identified as TCP designation to the National Register under "[o]pportunities for historic preservation in Hawai'i" but noted "it is unclear how best to move forward." *Id.* at 45.

The 2022 Plan can carry forward the opportunities identified in the previous plan by specifying TCP designation of Mauna Kea from the 6,000 foot elevation to the summit and incorporating this into its planning process. As described *supra*, the survey-level work is already accomplished, experts have concluded TCP designation is appropriate, and stakeholders - whether or not they agree with astronomy development - do not dispute that Mauna Kea has a high level of traditional and cultural significance. TCP designation of Mauna Kea from the 6,000 foot elevation to the summit is an overdue and necessary component of the 2022 Plan.

Mahalo nui for holding public scoping meetings and public comments.

Yours,

Bianca Isaki, Mauna Kea Program Director

KAHEA: The Hawaiian-Environmental Alliance