



United States Department of the Interior

NATIONAL PARK SERVICE
Kaloko-Honokōhau National Historical Park
73-4786 Kanalani Street, # 14
Kailua-Kona, Hawai'i 96740



IN REPLY REFER TO:
L7621 (2021-6)

April 7, 2017

Mr. Riley Hakoda
Land Use Commission, State of Hawai'i
P.O. Box 2359, Honolulu, Hawai'i 96804
riley.k.hakoda@hawaii.gov



Mr. Paul Childers
University of the Nations, Kona, Inc.
75-5851 Kuakini Highway #248
Kailua-Kona, Hawai'i 96740
campusdirector@uofnkona.edu

Dear Mr. Hakoda and Mr. Childers:

Thank you for providing the National Park Service (NPS) with the opportunity to provide input for the University of The Nations, Kona, Inc. 2020 Master Plan Update, Kailua-Kona, Environmental Impact Statement (EIS).

The University of the Nations is proposing expansion of its existing campus, located in Kailua-Kona on the Island of Hawai'i, onto two neighboring parcels, identified by Tax Map Keys: (3) 7-5-010:085 and 7-5-017:006, that were reclassified to the State Land Use Urban District by the State of Hawai'i Land Use Commission in Docket No. A02-737. Fully developed, the proposed project will include student housing, academic instruction buildings, student center, lower school, athletic facilities, chapel, maintenance and storage facilities, and support infrastructure which includes expansion of the existing "spine road", a secondary access point off Kuakini Highway, and necessary roadway improvements. The proposed project will require the University of The Nations to file a motion with the Land Use Commission, State of Hawai'i (LUC) to amend its Findings of Fact, Conclusions of Law, and Decision and Order for a Land Use District Boundary Amendment, dated August 8, 2003, and Change of Zone.

While the proposed project is not immediately adjacent to Kaloko-Honokōhau National Historical Park, water, fish, birds, insects, etc. move; and our coastal natural, biocultural and cultural resources in West Hawai'i are fragile. Furthermore, the Hawai'i County's Department of Water Supply manages the North Kona water system as a whole. Water in their system travels many miles. Water for the development, and use of the proposed expansion, may be pumped from more distant wells, particularly those upslope of the National Historical Park, which can impact natural freshwater discharge rates and salinity levels.

EXPERIENCE YOUR AMERICA

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

Kaloko-Honokōhau National Historical Park was authorized in 1978 by Congress to preserve, interpret, and perpetuate traditional native Hawaiian activities and culture (Public Law 95-625). The Park contains two large (11- and 15-acre) ancient Hawaiian fishponds with large associated wetlands, more than 180 known anchialine pools, and 596 acres of marine waters. The pools and fishponds are significant cultural resources that define the Park and also provide habitat for four federally listed species under the Endangered Species Act. The Park water resources are fed by, and in the case of the anchialine pools and 'Aimakapa Fishpond, are solely dependent upon groundwater inputs to maintain these ecosystems. 'Aimakapa Fishpond and wetland is core habitat for the recovery of two endangered waterbird species, the Hawaiian stilt (*Himantopus mexicanus Knudseni*) and the Hawaiian coot (*Fulica americana alai*), and is habitat for migratory waterfowl.

To ensure the National Park's outstanding cultural and natural resources including fresh clean groundwater, ancient fishponds, anchialine pools, coastal waters, and coral reefs are protected from adverse impact, the Draft EIS should identify the sources of drinking and irrigation water for the full extent of the proposed expansion. The NPS is highly concerned that the collective impacts of groundwater withdrawals could potentially impair the groundwater-dependent cultural and natural resources in the Park. The NPS requests that the Draft EIS for the project include information about how this project's water requirement adds to the cumulative usage of groundwater combined with the proposed needs of the surrounding developments. The EIS Preparation Notice states at full build-out, this project will require 641 water units (256,400 gallon of water per day) from the Hawai'i County Department of Water Supply. Although the water demand for this project may be small relative to the recharge rate of the aquifer, we note that this project is one of many projects that are proposed in the vicinity, and that the cumulative impacts of these withdrawals may be significant and should be addressed.

Specific Comments on the Draft EIS Prep Notice

Page 4-7 *"The Keauhou Aquifer System Area (ASYA) was identified to be considered for further evaluation and detailed assessment."*

Is the acronym "ASYA" a typo. Would "KASA" be more appropriate?

Page 4-7 *"Therefore, the Keauhou Aquifer System, Hawai'i Water Use and Development Plan Update (Keauhou HWUDP), dated March 2017, guides the County in an integrated approach to land use planning and water resource development and provides an estimate of anticipated future water demand projections based on County land use/zoning policies and water use rates for the Keauhou ASYA."*

The Hawai'i County Department of Water Supply revised Keauhou section of its Water Use and Development Plan is still a Draft document, because it has not been adopted by the Hawai'i County Council. The Draft EIS should be revised to reflect this.

Page 4-7 *"The Keauhou HWUDP encourages development of future high-level wells for the DWS system in areas generally between 1,500-feet and 1,800-feet ground elevations mauka of Māmalahoa Highway, with the overall goal of sustainability throughout the region. The goal of this source development strategy is to accommodate future anticipated demands identified by the Keauhou HWUDP. According to the Keauhou HWUDP, the Petition Area is depicted to have a future anticipated demand of 100,000 Gallons Per Day (GPD) by the Conceptual Ground Water*

Source Development and Anticipated Water Demands Map, Aquifer Sector, Hualālai 809, Aquifer Systems, Keauhou 80901.”

Page 4-7 “*The Preliminary Infrastructure Assessment and Conceptual Infrastructure Master Plan included an assessment of the existing and proposed water systems for the Petition Area. The Existing Campus Site is supplied by the DWS off of the DWS 325 reservoir. There are no on-site water sources or sources of recycled or non-potable water. While the Petition Area is being developed in three phases over 30 years, a new water source(s) will be needed to support buildout of each phase and the expansion of the Petition Area. New wells may be drilled and treated to provide additional potable water on-site. For the UNK Update, a Water Supply Study for the Planned Expansion of the University of the Nations, Kona, Hawai‘i was conducted by Tom Nance Water Resource Engineering in 2020. U of N Kona has also been in discussions with neighboring landowners to potentially form partnerships to develop new wells and water sources off-site. Any off-site water source improvements would likely be dedicated to the County and additional DWS water unit credits would be secured for the expansion of the Petition Area. A discussion of the water source necessary to support the UNK Update will be addressed in greater detail in the Draft EIS.*”

The NPS requests that future water use estimates and potential sources be provided in detail. It is the understanding of the NPS that DWS will not be developing/operating new sources in the basal aquifer, and the nearest likely sources of high-level groundwater are at least two miles away.

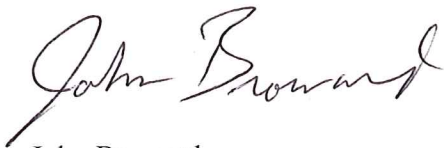
Page 5-1 “*The Draft EIS will more specifically assess the probably indirect and cumulative impacts of the UNK Update.*”

The NPS requests that the cumulative impacts of groundwater use associated with this development on the Keauhou aquifer system be included in this assessment.

We look forward to reading a more detailed discussion of the water source or sources necessary to support this project, along with an analysis of this project and the potential cumulative impacts of proposed water withdrawals on groundwater dependent ecosystems in the Draft EIS.

If you have any questions regarding this letter, please contact Dr. Jeff Zimpfer, Environmental Protection Specialist, at 808-329-6881 ex 1500 or jeff_zimpfer@nps.gov.

Sincerely,

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

John Broward
Superintendent
Kaloko-Honokōhau National Historic Park