

Mauna Kea Recreational Users Group

Public Land for Public Use
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contact@maunakearug.com

September 8, 2010

CHAIRMAN
Wayne Blyth

Department of Land and Natural Resources

COMMITTEES

Attn: Board Members

Bob Duerr
Fishing

1151 Punchbowl Street, Room 130,
Honolulu, Hawaii 96813

Matt Hoefflinger
Hunting

Reference:

C. 1. Acceptance of a Hearing Master Report on a Public Hearing for a Proposed Addition to the Natural Area Reserves System, and Withdrawal of Portions of Governor's Executive Orders 1225 and 1588 and Re-Set Aside as an Extension of Puu Makaala Natural Area Reserve, and Immediate Management Right-of-Entry, for TMK (3) 2-4-08:09 (POR), South Hilo, Hawaii

Nani Pogline
Hiking

Chris Seymour
Bicycling

D. 3. Cancellation of Governor's Executive Order Nos. 1225 and 1588 and Reset Aside Portion to State of Hawaii, Department of Defense, for Youth Challenge Academy and Hawaii Army National Guard Training Purposes, with an Access and Utility Easement Reserved to the Department of Land and Natural Resources, Division of Forestry and Wildlife, Waiakea, South Hilo, Hawaii, Tax Map Key: (3) 2-4-08:09 por.;

Dennis Vierra
OHV

Pat Reppun
Equestrian

Cancellation of Governor's Executive Order No. 3678 and Grant of Perpetual Non-Exclusive Easement to Department of Defense for Access and Utility Purposes, Waiakea, South Hilo, Hawaii, Tax Map Keys: (3) 2-4-08: por. & 1-8-12: por.

MEMBER
ORGANIZATIONS

Big Island Gun Dogs

Hawaii Hunting Association

Dear Chairperson and Board Members:

Pig Hunters of Hawaii

The Mauna Kea Recreational Users Group is a coalition representing the various user interests of public lands. Our primary mission is preserving public access. We are addressing both items as one as we can't see how they can be reasonably considered separately.

Rock Island Riders

Big Island

Mountain Bike Association

While we can support in theory the NARS and DOD concept, we cannot support the proposal as it stands now. As we testified at the hearing at Cooper Center on July 12 our position is that the public deserves access to and through the former Kulani Prison site exclusive of NARS or DOD control.

We feel the headlong rush to take this proposal through the system has resulted in several glaring deficiencies which should be addressed before proceeding. This hurry is unnecessary from either the NARS or DOD points of view. The current 25 year duration MOA between PSD and DOD allows for operation of the Youth Challenge Academy and assigns to DOD responsibility for the Three Mountain Alliance MOA for ongoing cooperative watershed/land management efforts.

We have two main areas of concern: (1) inadequate consideration of public access needs and (2)

inappropriate avoidance of the letter and intent of Chapter 343 HRS.

1. Public access. A member of the public would have to deal with potentially three different jurisdictions to acquire access through the parcel, DOFAW's local office, NARS, and DOD. Shortly after the Cooper Center hearing we requested a permit to access the site to investigate possible public access alignments and to familiarize our members with the area in general. While this visitation was never accomplished, we were able to meet with Youth Challenge Academy officials to discuss public access. It became apparent at this meeting that the proposal as drafted did not allow DOD enough latitude to negotiate an agreement to meet public access needs.

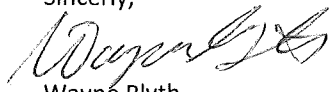
Until it was connected to Saddle Road in 1963 Stainback Highway was the only route to the summit of Mauna Loa. At that time use of the road became restricted due to security concerns relating to prison operations. Now that the prison is no more we would like to see the vision of Tom Vance (Director of Institutions, 1948) and Governor Stainback be reinstated. Another route which has been mostly ignored is the historic Puu O'o Trail which runs through the property. Should there be planning for these routes to be included in the Na Ala Hele trail system?

2. Chapter 343 HRS requirements and intent. The intent of 343 is *"The legislature further finds that the process of reviewing environmental effects is desirable because environmental consciousness is enhanced, cooperation and coordination are encouraged, and public participation during the review process benefits all parties involved and society as a whole."* The proposal was drafted by discussions between DOFAW/NARS and DOD/YCA ignoring any public participation. The same exemption from the requirements of Chapter 343 HRS is being cited for both initiatives *"Operations, repairs or maintenance of existing structures, facilities, equipment or topographical features, involving negligible or no expansion or change of use beyond that previously existing"*. To most people a adult corrections facility is not the same use as a 'boot camp' for youth with accompanying possible military training. The voluntary PSD participation in the Three Mountain Alliance MOA is not the same as a NARS.

Given the restricted access to the parcel under either PSD or DOD/YCA/NARS control any past or future environmental assessments will not have to address full public access issues. Also the 'insider trading' aspects of this plan has not allowed proper public input on other potentially desirable uses for the property.

For these reasons we ask the Board to require an environmental assessment process be initiated before moving forward.

Sincerely,



Wayne Blyth
Chairman