

Pele Hanoa
P.O. Box 472
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November 21, 2006

Chris Yuen (Director)
Planning Department
County of Hawaii
101 Pauahi Street
Hilo, Hawaii 96720

Re: Draft EIS Sea Mountain

Dear Mr. Chris Yuen,

I am a property owner at Punalu`u (Kuleana land since 1852 awardee) and I have reviewed the subject Draft EIS. I am providing the following comments:

1. Native Hawaiian Rights

The effects that the DEIS would have on native rights should be discussed. Protection and preservation of significant archaeological, historical sites as well as traditional Hawaiian practices and access rights such as, (fishing, food gathering and religious ceremonial practices) which occur on the entire area of the proposed development and most of the Ka'u coast along the shoreline need to be addressed. The draft EIS fails to address in any meaningful way how native Hawaiians and others can practice their religions and cultural living. It appears that the proposed plan would not allow residents to utilize the shoreline to conduct these activities or would have a chilling effect on the rights to exercise the Hawaiian religious and cultural imperatives. The developer fails to list the seven Koas (fishing grounds) that are thriving with various fishes, shell fishes and limus. As is, the developer will eventually pollute and destroy these precious resources as well as the entire coastline of Punalu`u, Ninole and Kawa.

2. The Endangered Hawksbill and Green Sea Turtles

Punalu`u has one of the largest concentrations of green sea turtles in the entire Hawaiian Island Chain. This area also provides a nesting habitat for the native Hawksbill (Honu'ea) turtle population. Honu'ea are extremely sensitive to human activity including artificial lighting (nighttime). Human presence has been known to cause these turtles to feel threatened. Artificial lighting can be distracting to hatchlings. When they become distracted and disoriented, these young turtles may venture inland away from the water making them susceptible to hungry land predators as well as vehicles. Because further

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development means increased human activity and lighting along or near the shoreline, these fragile creatures will surely suffer the consequences.

3. Old Government Road and Trails

Portions of the old government road (alanui aupuni) from Punalu`u to Ninole have already been destroyed. The planned relocation of the golf fairways to the coastal plain between Ninole cove and county parks would destroy that portion of the area. The proposed development plan fails to discuss the negative impacts that the resort would have on the area by realigning the old government road such as, the inevitable relocation of the golf course (placing it closer to the old fish ponds), restricting access to the shoreline (to the local public) and damaging old trails and priceless significant historical sites which include heiaus, burial caves and rare plants.

4. Natural Hazards

The potential of natural coastal hazards such as tidal waves (caused by locally generated earthquakes) also needs to be addressed. As we know, Hawaii has been affected by tidal waves in the past such as those which occurred in 1946, 1960, and 1975. It should be noted that this natural phenomenon can cause severe damage and occur without warning. Flooding is another topic that should be discussed. The proposed development area is located in a historically known flood area. The possibility of flooding on the project site and the effects that it may have on project development, the ocean, species, and residents should be studied and discussed in the EIS.

Punalu`u's sweeping mountains, beautiful coastal vistas, fragile historical and archaeological sites (state's largest surviving heiau complex), easily accessible swimming area, and fine net throwing site should make it unthinkable that this truly unique remnant of old Hawaii be allowed to degenerate into an appalling Waikiki-style mini city. While the population is increasing, the beaches are not. As a result, these irreplaceable areas are being developed instead of being preserved. I feel that it is something that cannot take place in Ka'u.

Sincerely yours,

Pele Hanoa