

State of Hawai'i  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
Division of Forestry and Wildlife  
Honolulu, Hawaii 96813

April 14, 2023

Chairperson and Members  
Board of Land and Natural Resources  
State of Hawaii  
Honolulu, Hawaii

Land Board Members:

SUBJECT: ACCEPTANCE OF HEARING MASTER'S REPORT AND APPROVAL  
AND RECOMMENDATION TO THE GOVERNOR FOR ISSUANCE OF  
AN EXECUTIVE ORDER TO SET ASIDE EXISTING UNENCUMBERED  
STATE LANDS AT 'ILIO POINT, MOLOKA'I, TMK (2) 5-1-002:006 TO  
THE DEPARTMENT OF LAND AND NATURAL RESOURCES,  
DIVISION OF FORESTRY AND WILDLIFE,

AND

ISSUANCE OF AN IMMEDIATE MANAGEMENT RIGHT OF ENTRY TO  
THE DIVISION OF FORESTRY AND WILDLIFE

AND

REQUEST TO CLOSE 'ILIO POINT TO THE PUBLIC PURSUANT TO  
HAR § 13-209-4.5 FOR PUBLIC SAFETY PURPOSES, EFFECTIVE  
UPON DESIGNATION OF THE PUBLIC LANDS AS A NATURAL AREA  
RESERVE FOR A TWO-YEAR TERM

TRUST LAND STATUS:

Not applicable: Acquired after August 1959  
DHHL 30% entitlement lands pursuant to the Hawaii State Constitution: No

BACKGROUND:

'Ilio Point (TMK (2) 5-1-002:006) is currently unencumbered state land under the jurisdiction of the Department of Land and Natural Resources Land Division but has abundant natural resource potential and has been recommended for inclusion in the Division of Forestry and Wildlife's Natural Area Reserve System to provide protection and management as a biodiverse coastal reserve for native Hawaiian plants, seabirds, and marine mammals. Management of the 261-acre parcel as a Natural Area Reserve

(NAR) will help restore a coastal ecosystem that is part of a larger coastal wilderness area on the northwestern tip of Molokai. This area contains significant geological features including lithified sand dunes, sea cliffs, and subfossil bird bones and land snails.

The Natural Area Reserves System was established to preserve and protect representative samples of Hawaiian biological ecosystems and geological formations for future generations. The diverse areas protected as natural area reserves range from marine and coastal environments to lava flows, rainforests, and alpine deserts. These areas provide the last remaining habitat for many endangered species and protect important watershed forests.

Designation of 'Ilio Point as a NAR will provide compatible land use and management with contiguous coastal properties. East of 'Ilio Point is the Mokio property, managed by the Moloka'i Land Trust for conservation. Adjacent to Mokio is the Mo`omomi Preserve, managed by The Nature Conservancy. Combined, these conservation areas will protect approximately 2,800 acres of coastal habitat with over 4.5 miles of coastline in northwestern Moloka'i.

#### DISCUSSION:

The NARS Commission recommended the NAR on August 25, 2009, following the Division of Forestry and Wildlife's (Division) recommendation. On September 25, 2009, the Board approved the Division's request to hold a public hearing on the NAR proposal. Legal notice of the public hearing was published statewide in newspapers on October 16, 2009, and DLNR issued a press release on the hearing published in the *Moloka'i Dispatch* and *The Maui News* and sent notices to 22 agencies, organizations, and elected officials. The public hearing was held on November 9, 2009, pursuant to HRS § 195-4(b). Fourteen people attended the hearing, with four people testifying in favor, two providing historical/cultural comments, and one opposed. Seven letters were submitted, with four in support, and three requesting more information and/or commenting on the management of the area. Additionally, NARS staff conducted a public informational meeting to provide further information on the proposal on November 18, 2009. Attachment 2 contains a hearing master's report and summary of the oral and written testimony received, as well as a summary of the public informational meeting.

One challenge with the property from the Division perspective is its designation as a "Formerly Used Defense Site" with deed restrictions limiting public access until such time as the site is cleaned of potential unexploded ordinance. After the public meetings, the Division did not proceed immediately with a request to set aside the land until more attempts were made to find ways to allow public access. Multiple requests have been made over the years from congressional offices, the Department of Health, and others to prioritize this area for *Formerly Used Defense Sites* clean-up funding. However, due to the quitclaim deed that removed Federal liability from the property, this area continues to be a low priority for funding. But 1) given that liability to the DLNR is the same whether it is unencumbered state land or a natural area reserve, 2) that the area deserves active management, 3) over the past few years, the urgency of protecting this

ecosystem has heightened due to the rapidly expanding populations of Axis deer and subsequent damage to native vegetation, and 4) that over the years, various civil servant positions have been added and additional contract labor has been hired to provide the capacity to manage this area, the Division believes now is the time to move forward on the NAR proposal. Moloka'i Land Trust would be an active partner adjacent, and a federal grant has recently been awarded to construct a fence to protect a portion of 'Ilio.

### *Community Involvement*

Various individuals in the meetings and correspondence from the Marine and Coastal Zone Advocacy Council (MACZAC) requested that DLNR work closely with the Moloka'i community, especially in Kaluako'i, on proposed management plans and activities, including incorporating their shared knowledge of the area. This included a request to manage for both mauka-makai resources and create a community governance mechanism, in order to incorporate the State of Hawai'i Ocean Resources Management Plan Goals and Objectives into any future NARS management plans and activities. Individuals also requested that lineal descendants be recognized and consulted during future planning for 'Ilio Point.

Due to the long pause between the public hearings and the NAR proposal being sent to the Board, staff wanted to re-connect with the community again prior to this Board hearing. The Division recently held four meetings on Moloka'i to discuss the proposed 'Ilio Point Natural Area Reserve, and the cat- and deer-proof fence being proposed at 'Ilio. These were not official public hearings, which had already been conducted, but instead were offered for the community to learn about the proposed management at 'Ilio and voice their opinion about the future for the area in an informal setting. Below is a summary of those meetings, held in the Maunaloa Community Center (MCC) on the western side of the island, as well as in the Mitchel Pau'ole Center (MPC) in Kaunakakai.

December 21, 2022 – Meeting held at the MCC at 5:00 pm. Two community members attended and there was no opposition to the project. Those in attendance agreed that there is a need for management in both areas.

December 22, 2022– Meeting held at the MPC at 5:30 pm. One community member attended and was interested in learning about management efforts and thought designation was a good idea.

January 18, 2023 – Meeting held at the MCC at 5:00 pm. No one from the public attended.

January 19, 2023 – Meeting held at the MPC at 5:00 pm. Nine community members attended. Many sought a commitment from the State for funding for continued management, not just for initial management. Attendees sought access to the shoreline for fishermen as well as access to deer outside of any fenced area to benefit food security. Attendees also wanted access to areas for camping and hiking, although they do not want it to become a tourist spot. Meeting attendees were supportive of the designation and project if community access concerns were addressed.

### *Access, Unexploded Ordnance and Environmental Hazards*

The proposal (Attachment 1) describes the past use of 'Ilio Point as a Coast Guard LORAN Station and an aerial bombing and strafing range by the U.S. Navy, which left unexploded ordnance and other hazardous materials on the landscape. When the area was purchased by the State from the Federal government in 1968, the quit claim deed assigned the responsibility to decontaminate the property to the State, rather than the Federal government. The deed prohibits public access until the surface of the property is cleared of unexploded ordnance, and the area is currently closed per DLNR Land Division rules. The access situation will not change with designation as a NAR due to this deed restriction.

Ordnance surveys from 'Ilio and adjacent areas have found various artifacts associated with the past use as an aerial bombing and strafing range from World War II. Historical reports of 'Ilio have indicated that it has been superficially cleared of unexploded ordnance, certain areas have received multiple sweeps, and certain areas, such as the coast guard buildings, have received sub-surface clearance. The DLNR has also consulted with the Department of Health regarding safety considerations for accessing 'Ilio and has been notified that the abandoned coast guard buildings are contaminated with lead and asbestos.

To address these hazards, the Department proposes the following actions:

1. Placing additional signage to avoid buildings. Management of the Natural Area Reserve does not require the use of the buildings.
2. Training for staff and contractors on unexploded ordnance (UXO) safety hazards and avoidance. If management of the area requires that untrained visitors enter the reserve, for example, specialized plant or wildlife researchers, those visitors must be accompanied by staff who have received UXO safety training. The Division will refer to the Kaho`olawe Access and Risk Management Plan (Level 1 areas) to determine appropriate access protocols.
3. The Division will implement unexploded ordnance avoidance prior to conducting any ground penetrating activities such as fencing by contracting an Explosives Ordnance Detection (EOD) Technician to sweep the areas of unexploded ordnance.
4. Installing signs at the NAR perimeter about access restrictions due to unexploded ordnance. There is already Land Division signage indicating the closed area.

The U.S. Coast Guard conducted a debris pile remediation at 'Ilio in 2010 to remove waste and debris from the former LORAN station. Debris had been discarded from launch points in several areas near the shoreline containing electrical equipment, batteries, and metal debris, with contaminants of concern being polychlorinated biphenyls (PCBs) and eight Resource and Conservation Recovery Act metals. Their report concluded that after the clean-up, verification samples show levels of PCBs and metals in the remaining soil are under project action limits for human health and the environment given the expected use of the property.

### *Closure*

Due to the deed restriction to prohibit public access until the surface of the property is decontaminated of unexploded ordnance, the NARS Commission recommended in its November 29, 2012, meeting that a temporary two-year closure of the proposed Natural Area Reserve take effect upon the Reserve's designation. Currently, NARS rules under HAR § 13-209-4.5 state:

***Closing of areas.*** *The board or its authorized representative, with the approval of the commission, may close or restrict the public use of all or any portion of a natural area reserve for up to two years, when deemed necessary by the commission for the protection of the natural, geological, or cultural resources of the area or the safety and welfare of persons or property, by the posting of appropriate signs indicating the duration, extent, and scope of closure. Closures may be renewed with the approval of the board or its authorized representative and the commission. All persons shall observe and abide by the officially posted signs designating closed areas.*

While an initial two-year closure is requested, the Division anticipates renewing the closed area designation until such time as the terms in the deed for decontamination are met.

### CHAPTER 343 – ENVIRONMENTAL ASSESSMENT:

This action before the Board represents a transfer in management jurisdiction and does not constitute a use of State lands or funds, and therefore, this action is exempt from the provisions of Chapter 343, HRS, relating to environmental impact statements. The Division of Forestry and Wildlife shall be responsible for compliance with Chapter 343, HRS, as amended for NARS program activities.

### RECOMMENDATION: That the Board:

- 1) Accept the Hearing Master's Report (Attachment 2).
- 2) Approve and recommend to the Governor the issuance of an executive order setting aside approximately 261 acres, to be determined by survey and as shown in Attachment 1, at 'Ilio Point, Moloka'i TMK (2) 5-1-02:06, to the State of Hawaii, Department of Land and Natural Resources, Division of Forestry and Wildlife, for the 'Ilio Point Natural Area Reserve, under the terms and conditions cited above, which are by reference incorporated herein and subject further to the following:
  - a. The standard terms and conditions of the most current executive order form, as may be amended from time to time;
  - b. Disapproval by the Legislature by a two-thirds vote of either the House of Representatives or the Senate or by a majority vote by both in any regular or special session next following the date of the setting aside;
  - c. Review and approval by the Department of the Attorney General; and

- d. Such other terms and conditions as may be prescribed by the Chairperson to best serve the interests of the State.
- 3) Authorize issuance of an immediate management right of entry to the Division of Forestry and Wildlife covering the subject area under the terms and conditions cited above, effective immediately upon transfer from Land Division, which is by this reference incorporated herein and further subject to the following:
- a. The standard terms and conditions of the most current right-of-entry permit form may be amended from time to time;
  - b. Such other terms and conditions as may be prescribed by the Chairperson to best serve the interests of the State.
- 4) Ratify closure of the area per § 13-209-4.5 for a two-year term commencing at the designation of the 'Ilio Point Natural Area Reserve.

Respectfully Submitted,



---

DAVID G. SMITH, Administrator  
Division of Forestry and Wildlife

APPROVED FOR SUBMITTAL:



---

DAWN N.S. CHANG, Chairperson

Attachment 1: Map and Proposal for the 'Ilio Point Natural Area Reserve  
Attachment 2: Hearing Master's Report – 'Ilio Point Natural Area Reserve

PROPOSAL FOR THE ILIO POINT  
NATURAL AREA RESERVE

## I EXECUTIVE SUMMARY

The northwestern tip of Molokai is proposed to become a Natural Area Reserve (NAR). Designation of the area as a NAR is meant to protect and help restore a coastal ecosystem that is part of a larger wilderness area. This area also contains significant geological features of lithified sand dunes, sea cliffs, and subfossil bird bones and land snails.

## II INTRODUCTION (General)

Ilio Point has long been known for its significant biological and geological features. The coastal vegetation is particularly rich, with five native coastal natural communities comprised of 23 native plant species. The sand dunes are predicted to be able to support abundant seabird populations, if predators are controlled (Swenson, USFWS, 2008 and Duvall, DOFAW, 2009). Evidence of previous bird inhabitation, as well as observations of nesting attempts suggest that this could be a significant nesting ground. For example, habitat restoration in nearby Mokia Preserve managed by the Molokai Land Trust, and Moomomi Preserve, managed by The Nature Conservancy, has encouraged nesting of wedge-tailed shearwaters (*Puffinus pacificus*) (TNC, 2005). The endangered Hawaiian monk seal (*Monachus schauinslandi*) also has been seen resting at Ilio Point.

The inclusion of this area into the NARS is meant to protect a coastal ecosystem. This type of ecosystem merits conservation and restoration effort because coastal areas have been severely modified by invasive species and human activity and development in Hawaii.

Priority threats to these resources are ungulates such as Axis deer (*Axis axis*), non-native plants, especially Kiawe (*Prosopis pallida*), and predatory mammals. Complicating restoration attempts is the presence of unexploded ordnance and degrading buildings from past military use.

The area proposed is approximately 261 acres of unencumbered State land in the Conservation District, identified by TMK (2) 5-1-002;006.

## III BACKGROUND AND HISTORY

### *Past Land Use and Conservation History*

Evidence of human use of the long, windswept coastline of northwestern Molokai dates back to 1200 AD (Juvik, et. al. 1998). Fishing shrines (*koa*), *heiau*, burials, and basalt quarries are the main archeological sites found on the north and west coasts, including a *koa* found at the tip of Ilio Point (Juvik, et. al., 1998).

Throughout human occupation, Ilio Point remained an important fishing area, but did not escape modification and development. The United States Navy acquired the Site in 1940 from a private landowner for use as an aerial bombing and strafing range. In December 1949, the U.S. Navy transferred ownership of the 261 acre parcel to the US Coast Guard for use as a Loran Station. At that time the entire site was superficially decontaminated of unexploded ordnance

(UXO) and only the few acres of land surrounding the USCG building sites were completely cleared of UXO. The Loran station was closed in 1966, and then sold to the State of Hawaii (Dashiell, 1988). In 1966, a month-long de-dudding operation including a surface sweep and clearance of the area was undertaken. When the area was purchased by the State in 1968, an amendment of the deed placed the responsibility to decontaminate the property on the State, rather than the Federal government. In the late 1970s, State Legislators requested that Ilio Point be decontaminated to allow the area to become a park.

While the area was once again studied as a possible Marine Corps base in 1996, not much activity has since occurred in Ilio Point. In 2003, the area was briefly used as a landing site for air assault training by the U.S. Army. Three areas near the westernmost point were visually inspected for UXO, with none found. In 2011, the U.S. Coast Guard remediated piles of debris, and certified that the soil and rock beneath, adjacent to, and downgradient of the piles were sufficiently characterized to indicate that PCB and metal contaminants are below the project action limits (USCG, 2011).

Throughout the years, ungulates, especially Axis deer (*Axis axis*) have impacted the vegetation, and alien plants have invaded. However, biological surveys still attest that this area contains high levels of biodiversity, and also the potential for seabird habitat. In 2008, Molokai Land Trust leased the surrounding property, which extends to the south and west. The land trust is now installing a predator-proof fence directly east of Ilio, and has shown success at removing predators and weed species to recover native species. West of the land trust's area is Moomomi, a preserve owned and managed by The Nature Conservancy, which also has a predator- and deer-proof fence. These neighboring conservation projects strengthen the potential for restoration of Ilio.

#### *Present Land Use and Access/Cultural Recreational Uses*

Ilio Point, or Kalaeokailio, has an ancient legend of a red dog associated with it, which explains its name (Ne, et. al., 1992). This area also contains plants and animals that Hawaiians traditionally collect for practical, medicinal, decorative, and spiritual uses (Gutmanis, 1979). Some of these plants and animals are considered sacred to certain gods or because they are associated with cultural practices (Kanahele, 1986). For instance, the Pau o Hiiaka (*Jacquemontia ovalifolia*) is associated with a legend about goddesses Hiiaka and her sister Pele. Pili grass (*Heteropogon contortus*) was widely used by Hawaiians for thatch and house construction, and Ilima papa (*Sida fallax*) is popular for making lei. Preservation of these species is essential to the continuation of traditional Hawaiian cultural practices.

Currently, few dilapidated Coast Guard buildings remain, and a private 4WD road intersects the property from the east. Some visitors access this area from the south, following a coastal trail. As mentioned earlier, an ancient fishing shrine exists in Ilio Point, and this area is still important for fishers. Some hunters may visit the southeastern portion of the area.

#### *Previous Studies*



Ilio Point has been studied for its archeological, paleontological, geological, and biological resources. Botanical findings have been recorded by the Hawaii Natural Heritage Database, as well as by the National Tropical Botanical Garden. Additionally, a botanical survey has found 21 coastal plant species at Ilio Point, one of which was referred to as an undescribed taxon of *Chenopodium* which is only known from a few individuals from two sites (Warshauer, et. al., 2008).

#### IV JUSTIFICATION (Specifics)

##### *Scientific Value*

Ilio Point is one of the most species-rich coastal ecosystems, with over 70% of arid native species present (Warshauer, et. al. 2008).

Additionally, the area has had enormous scientific value because it contains avian and land snail subfossils. A survey in 1971 by Joan Aidem resulted in the discovery of two new genera and species of flightless birds in the dunes of Ilio Point (Kay, 1995). This was a major breakthrough in avian paleontology in Hawaii.

Ilio Point represents the NW rift zone of West Moloka'i Volcano, which formed during the Pliocene and Pleistocene (Stearns and Macdonald, 1947; Sherrod, et. al., 2007). The youngest lavas at Ilio Point are part of the Pleistocene postshield-stage sequence erupted from Kahenawai. Younger and older beach and dune deposits from the Holocene extend eastward from the area, past a buried shield-stage cinder cone at Kealapupuakiha, and partially covering shield lava at Puu Kaeo. An adze quarry near Puu Kaeo (Sinton and Sinoto, 1997) is mainly situated in a late-shield lava flow that partially drapes around the slightly older Kaeo cone and lava (Sinton, unpublished). Unlike Kaena and Moomoni, Ilio point is surrounded by sea cliffs.

The seabirds that have been recorded nesting or flying off the coast suggest the potential for a thriving nesting ground, if predation was controlled (Duvall, 2009). Additionally, the area is visited by endangered Hawaiian monk seals (*Monachus schauinslandi*). As coastal ecosystems throughout Hawaii lose species and extent from stressors such as alien species, development and other human use, and other indirect threats, an example of an ecosystem of this quality and richness is increasingly rare and merits protection (Warshauer, et. al, 2008).

##### *Representativeness*

Hawaii Revised Statutes Chapter 195 established the NARS "to preserve in perpetuity specific land and water areas which support communities, as relatively unmodified as possible, of the natural flora and fauna, as well as geological sites, of Hawaii." While there are other coastal Natural Area Reserves, none contain the same set of species. For instance, Kaena Point NAR, which has a "very dry" moisture level, does not contain many of the 23 species that are found at the "arid" Ilio Point (Warshauer, et. al., 2008). Appendix 1 lists these plant species, and distinguishes which are not found at Kaena.

This area is excellent seabird and seal habitat, particularly if predators are removed.

### *Natural Communities and their Status*

Natural communities include: 1) Mixed native grasses and shrubs near shore, 2) Akiaki (*Sporobolus virginicus*) grassland, 3) Ilima (*Sida fallax*) shrubland on rock outcroppings, 4) Nama (*Nama sandwicensis*) herbland on sandy substrates, and 5) Akulikuli (*Sesuvium portulacastrum*) herbland near shore. The status of Ilio's natural communities is described as "One of the finest arid vegetation examples in Hawaii; ca 70% of Arid spp. present; prostrate *Chenopodium* of a different taxon; needs protection; extensive" (Warshauer, et. al, 2008).

Wildlife biologist Fern Duvall notes that while area "has more species of nesting seabirds (nest attempts) than Moomomi currently has...Predation by numerous cats, mongooses, and rats (dogs?) is severe" (Duvall, 2009).

Kiawe (*Prosopis pallida*) forest persists with alien shrubs and grasses, and the buildings and jeep roads contain mixed alien shrubs and grasses.

### *Rarity*

Appendix 1 lists rare plant species that have been recorded by various botanical surveys. Additionally, Appendix 2 lists seabirds that have been seen nesting, roosting, or near shore, as well as the endangered Hawaiian monk seal (*Monachus schauinslandi*) and the threatened Green sea turtle (*Chelonia mydas*).

As discussed in the "Scientific Value" section, a coastal community of this quality is itself rare in Hawaii.

### *Biological/Ecological Design*

The boundaries of the proposed Reserve encompass most of the remaining coastal ecosystem on the northwest point (Ecoregional Planning Team, 2006). Unfortunately, little contiguous lowland ecosystem remains, as it has been thoroughly invaded by alien species, as well as been utilized as cattle pastures to the south.

The NARS Commission has indicated that it would be beneficial for Reserves to be adjacent to areas currently managed for conservation so that management activities could be leveraged. The proposed Reserve is surrounded by land managed by the Molokai Land Trust, a potential partner in the conservation efforts for the entire region. Additionally, TNC's Moomomi Preserve can provide lessons for the management of coastal ecosystems.

### *Location and Size*

The proposed Ilio Point Natural Area Reserve is 261 acres, identified by TMK (2) 5-1-002;006. Figure 1 contains a map of the area, which includes the location of the 4WD road and surrounding land parcels and their ownership.

### *Threats (Human/Biological)*

High priority threats to the ecosystem of Ilio Point include Axis deer (*Axis axis*) and goats (*Capra hircus*), invasive plant species, and predators of seabirds. Alien tree species, especially Kiawe (*Prosopis padilla*), have invaded Ilio point. Additionally, *Verbesina encelioides*, Australian saltbush (*Atriplex semibaccata*) and *Lantana camara* also are found throughout the area. Bermuda grass (*Cynodon dactylon*) is present in grassland patches near the jeep road.

Ungulates in coastal ecosystems are also an “important threat, one that frequently opens the door for, or tips the balance to, alien plants” (Warshauer, et. al., 2008, p. 27). Axis deer, in particular, are present in large numbers at Ilio (Duvall, 2009).

Finally, the presence of predators such as rats (*Rattus* spp.), dogs (*Canis familiaris*), cats (*Felis catus*), mice (*Mus musculus*), and mongoose (*Herpestes javanicus*) not only kill seabirds, but also harass monk seals. Observations from Hawaii and around the world have shown that rats will eat seabird eggs and chicks, and even attack adult birds. Rodents also consume native seeds and plants. Predators also act as carriers of leptospirosis, morbilli virus (distemper), and toxoplasmosis. The recently published Recovery Plan for the Hawaiian Monk Seal identifies the transfer of these diseases as one of the threats to monk seal survival. Another applicable threat listed in the recovery plan is human disturbance from fishing interactions or on popular beaches. Alien ants also threaten coastal arthropods, and have the potential to spread ant-pollinated invasive species (Warshauer, et. al, 2008).

A special threat to managers and visitors is the potential existence of dangerous unexploded ordnance.

### *Present Level of Protection*

Ilio Point is unencumbered State land in the Conservation District, under the jurisdiction of the Department of Land and Natural Resources.

No known on-the-ground restoration efforts are occurring at Ilio Point, but the area is surveyed occasionally to monitor plants and wildlife.

### *Long-term Ecological Viability*

The viability of the coastal vegetation is primarily threatened by increasing invasion of Kiawe (*Prosopis pallida*), as well as by browsing from Axis deer (*Axis axis*). Without control of these priority threats, the ecosystem will continue to degrade.

Indirect threats such as species attrition and the lack of lowland native ecosystem connectivity are degrading Ilio Point’s natural communities. Species attrition is most likely to occur in smaller areas, such as offshore islands, where “there is not enough regional flow of propagules of many species to repopulate the islets from periodic losses” (Warshauer, et. al., 2008, p. 33). However, “these natural limitations could be offset through augmentation by out-planting species formerly known from that site” (Warshauer, et. al., 2008, p. 33).

“The widespread damage to coastal vegetation and the rarity of so many species indicates the urgency for supplying sufficient targeted management to preserve species and to restore community composition, structure, and function. The coastal vegetation’s adaptation to natural disturbance, as evident from the harsh environment it occupies, coupled with its regenerative capability, may have helped these communities survive thus far. This suggests a good potential for preservation of the biota of these regions if effective and strategic management actions are effected soon” (Warshauer, et. al., 2008, xii). With the removal of invasive plants, especially

Kiawe on dune ecosystems, native plants often will recolonize dunes naturally, as shown in Kaena Point NAR and Moomomi Preserve (TNC, 2005, Liesemeyer, personal communication, 2009).

Repeated nesting attempts suggest that with predator control, this area could become a viable seabird nesting site. Currently, however, there are no barriers from the influx of predators.

#### *Environmental Consequences of No Action/Urgency*

Designating this important core section of coastal vegetation and potential seabird habitat a NAR would enhance the ability of the Division of Forestry and Wildlife to participate and contribute to conservation and restoration actions across the entire coastline.

As this area has already experienced the local extirpation of native species and contains species that are in danger of extinction, it is projected that no management action would result in additional loss. Most pressing is the undescribed taxon of *Chenopodium*, which is only known from small populations at Ilio Point as well as from Puu Ka Pele, to the west. Additionally, the endangered Ihihilauakea (*Marsilea vilosa*) also could be re-established at Ilio Point, in the seasonal wetlands.

## V. MANAGEMENT NEEDS

### *Threats Requiring Management*

Control of invasive species is the highest management priority.

Fencing and other ungulate control methods are to prevent browsing of the coastal vegetation and predation. Other methods to control small predatory mammals include trapping, baiting, and poisoning. A fence is proposed to roughly follow the existing road and protect the areas north of that road from cats and deer.

Removing invasive plant species is another high-priority management action. Kiawe removal has shown promising results in Moomomi Preserve, and may provide an example of the type of results that could be obtained at Ilio Point (TNC, 2005).

Rare plants may need to be outplanted to enhance limited populations. Planting Naupaka (*Scaevola chamissoniana*) may help enhance nesting habitat for seabirds (Garnett, 2008, pers. communication).

Monitoring the status of the threats to the area, as well as native vegetation and wildlife, will be necessary to assess the success of management activities.

### *Administrative (size, boundaries, access: roads & trails, maps more specific than in introduction, TMKs)*

The proposed Ilio Point Natural Area Reserve is 261 acres, identified by TMK 2-5-100-206, It is Section 5 (a) lands of the Hawaii Admission Act: Non ceded.

## VI. PUBLIC SUPPORT

### *Agencies, Organizations, and Individuals Contacted*

DLNR, State Historic Preservation Division  
NARS Commission  
Conservation Council for Hawaii  
Sierra Club, Hawaii Chapter  
Environment Hawaii, Inc.  
Hawaii Audubon Society  
Hawaiian Botanical Society  
Office of Hawaiian Affairs  
Molokai Invasive Species Committee  
State Representative Carroll  
State Senator English  
Maui County Council  
DLNR, Division of Conservation and Resources Enforcement  
Hawaii Conservation Alliance  
The Nature Conservancy/East Molokai Watershed Partnership  
Molokai Land Trust  
Department of Hawaiian Home Lands  
Hui Malama O Moomomi  
Kalaupapa National Historic Park  
Molokai Ranch Co. Ltd.  
US Fish and Wildlife Service Pacific Islands Office  
Aha Kiole Council

*Comments received/Public Review Process*

July 22, 2009: DOFAW Recommends NAR to NARS Commission  
August 25, 2009: NARS Commission Recommends NAR to Board of Land and Natural Resources  
September 2009-February 2010: 7 written letters received on proposal.  
September 25, 2009: Board of Land and Natural Resources authorize public hearing  
October 16, 2009: Legal notice published in newspapers for public hearing  
Early November: DOFAW issues press release about hearing and articles appear in *Molokai Dispatch* and *The Maui News*. DOFAW/NARS and DLNR websites announce proposal.  
November 9, 2009: Public hearing held, 14 members of public attended hearing, testimony received from 7 members of community.  
November 18, 2009: Public informational meeting held, 11 individuals attended.  
December 21, 2022 – Meeting held at the MCC at 5:00 pm. Two community members attended.  
December 22, 2022– Meeting held at the MPC at 5:30 pm. One community member attended.  
January 18, 2023 – Meeting held at the MCC at 5:00 pm. No one attended and staff left at 7:00 pm.  
January 19, 2023 – Meeting held at the MPC at 5:00 pm. Nine community members attended.

Oral comments received by:

Joan Aidem  
Michael Grinnell  
William Garnett  
Butch Haase

William Kaholoaa  
Halona Kaopuiki  
Joe Kennedy

Written comments received by:

Patrick Conant

Lydia Garvey

Marine and Coastal Zone Advisory Council

Joshua Strickler, Department of Business, Economic Development, and Tourism

Linda Pratt

Marjorie Ziegler, Conservation Council of Hawaii

Clyde Namuo, Office of Hawaiian Affairs

## VII. BIBLIOGRAPHY/REFERENCES

U.S. Dept of the Interior, US Geological Survey. 2006. A Gap Analysis of Hawaii, Final Report. <http://higap.org>

Ecoregional Planning Team, The Nature Conservancy Hawaii. 2006. An Ecoregional Assessment of Biodiversity Conservation for the Hawaiian High Islands. <http://www.hawaii.ecoregionplan.info/home.html>

Dashiell, E. 1988. Defense Environmental Restoration Program For Formerly-Used Sites, Inventory Project Report, Molokai Loran Station, Ilio Point, Molokai, Hawaii.

Juvik, S., J. Juvik, T. Paradise. 1998. Atlas of Hawaii. Third Edition. Published by University of Hawaii Press.

Fornander, A., J. Stokes. 1880. An Account of the Polynesian Race: Its Origins and Migrations, and the Ancient History of the Hawaiian People to the Times of Kamehameha I. Published by Trubner & co., 1880

Ne, H., G. Cronin, T. Reffell. 1992. Tales of Molokai: The Voice of Harriet Ne. Published by Institute for Polynesian Studies.

Kay, A. 1995. A Natural History of the Hawaiian Islands: Selected Readings II. Published by University of Hawaii Press.

The Nature Conservancy (TNC). 2005. Long Range Management Plan for Moomomi Preserve FY 2007-2012. Prepared for the Department of Land and Natural Resources.

Mitchell, C., C. Ogura, D.W. Meadows, A. Kane, L. Strommer, S. Fretz, D. Leonard, and A. McClung. 2005. Hawaii's Comprehensive Wildlife Conservation Strategy. Department of Land and Natural Resources. <http://www.state.hi.us/dlnr/dofaw/cwcs/index.html>

Warshauer, R., J. Jacobi, J. Price. 2008. Native Coastal Flora and Plant Communities in Hawaii: Their Composition, Distribution, and Status. Hawaii Cooperative Studies Unit, University of Hawaii at Hilo.

Gutmanis, J. 1979. Kahuna Laau Lapaau. Island Heritage, Honolulu, HI.

Kanahele, G. 1986. Ku Kanaka – Stand Tall . University of Hawaii Press, Honolulu, HI.

Duvall, F. 2009. Important Ecological Areas: Ilio Point. Division of Forestry and Wildlife. Unpublished.

National Marine Fisheries Service, 2007. Recovery Plan for the Hawaiian Monk Seal (*Monachus schauislandi*). 2<sup>nd</sup> Revision. National Marine Fisheries Service, Silver Spring, MD.

U.S. Coast Guard (USCG), 2011. USCG Contract Number: HSCG86-10-C-PXA002ESI Project Number:110091 Remediation Verification Report Debris Pile Remediation Former United States Coast Guard Long Range Navigation Station Ilio Point Molokai, Hawaii. Prepared for U.S. COAST GUARD CIVIL ENGINEERING UNIT. Prepared by ENVIRONMENTAL SCIENCE INTERNATIONAL On Behalf of Pacific Commercial Services.

Sherrod, D.R., Sinton, J.M., Watkins, S.E., and Brunt, K.M., 2007, Geologic Map of the State of Hawai'i: U.S. Geological Survey Open-File Report 2007-1089, 83 p., 8 plates, scales 1:100,000 and 1:250,000, with GIS database

Sinton, J.M., and Y. Sinoto, 1997. A geochemical database for Polynesian adze studies, /Prehistoric Long-distance Interaction in Oceania/, M. Weisler, editor, /New Zealand// Archeol. Assoc. Monogr. /21, 194-204.

Stearns, H. T. and G. A. Macdonald, 1947. Geology and Ground-Water resources of the Island of Molokai, Hawaii, Hawaii. Division of Hydrography, Bulletin 11, 113 pp.

Experts Consulted:

Garnett, Bill. 2008. National Park Service. Personal Communication.

Haase, Butch. 2009. Molokai Land Trust. Personal Communication.

Liesemeyer, 2009. Natural Area Reserves System. Personal Communication.

### Appendix 1 Plant Species Recorded from Ilio Point

Scientific Name	Common Name	Federal Status	Notes
<i>Boerhavia acutifolia</i>	Alena		Not known from Kaena Pt NAR.
<i>Boerhavia repens</i>	Alena		
<i>Chamaesyce degeneri</i>	Akoko		
<i>Chenopodium</i> undescribed taxon	Aweoweo		Not known from Kaena Pt NAR.
<i>Cuscuta sandwichinna</i>	Kaunaoa		
<i>Fimbristylis cymosa</i>	Mauu akiaki		
<i>Heliotropium aromalum</i>	Hinahina		
<i>Helotropium curassavicum</i>	Kipukai		Not known from Kaena Pt NAR.
<i>Heteropogon contortus</i>	Pili		Not known from Kaena Pt NAR.
<i>Jacquemontia ovalifolia</i>	Pau o Hiiaka		
<i>Lycium sandwicense</i>	Ohelo kai		
<i>Melanthera integrifolia</i>	Nehe		
<i>Nama sandwicensis</i>	Hinahina kahakai		Not known from Kaena Pt NAR.
<i>Panicum fauriei</i> var. <i>fauriei</i>			Not known from Kaena Pt NAR.
<i>Portulaca lutea</i>	Ihi		
<i>Pseudographalium sandwicensium molokaiense</i>	Enaena		Not known from Kaena Pt NAR.
<i>Schiedea globosa</i>	Naupaka kahakai		Not known from Kaena Pt NAR.

<i>Sesuvium portulacastrum</i>	Akulikuli		Not known from Kaena Pt NAR.
<i>Sporobolus virginicus</i>	Akiaki		
<i>Waltheria indica</i>	Uhaloa		
<i>Sida fallax</i>	Ilima		
<i>Centaurium sebaeoides</i>	Awiji	E	Not known from Kaena Pt NAR (Source: B. Garnett, pers. communication, 2008)
<i>Marsilea vilosa</i>	Ihihilauakea	E	Not known from Kaena Pt NAR. Last observed at Ilio in 1970, but still present nearby Ilio.
<i>Chamaesyce skottsbergii</i> var. <i>skottsbergii</i>	Akoko	E	Last observed 1913 (Source: Hawaii Natural Heritage Database, 2004).
<i>Solanum nelsonii</i>	Popolo	C	Not known from Kaena Point NAR. (Source: Butch Haase)

**Federal Status** E = Endangered, C = Candidate for Listing, SOC = Species of concern  
Unless otherwise noted, species information from Warshauer, et. al., 2008.

## Appendix 2 Wildlife Observed at Ilio Point

Scientific Name	Common Name	Notes
<i>Anous minutus</i>	Noio, Hawaiian Black Noddy	Obs. nesting attempts
<i>Phaethon rubricauda</i>	Koae ula, Red-tailed Tropic bird	Obs. nesting attempts
<i>Bulweria bulwerii</i>	Ou, Bulwer's Petrel	Obs. nesting attempts
<i>Phoebastria immutabilis</i>	Laysan Albatross	Obs. flying offshore
<i>Puffinus pacificus</i>	Uau kani, Wedge tailed Shearwater	
<i>Sula leucogaster</i>	A, Brown Booby	Obs. flying offshore
<i>Sula sula</i>	A, Red-footed Booby	Obs. flying offshore
<i>Fregata minor</i>	Iwa, Great Frigatebird	Obs. roosting
<i>Monachus schauinslandi</i>	Ilioholoikauaua, Hawaiian Monk Seal	Obs. resting at point, swimming offshore, Endangered
<i>Chelonia mydas</i>	Honu, Green Sea Turtle	Obs. swimming offshore, Threatened

(Source: Duvall, 2009)






# Ilio Point



0 185 370 740 Meters

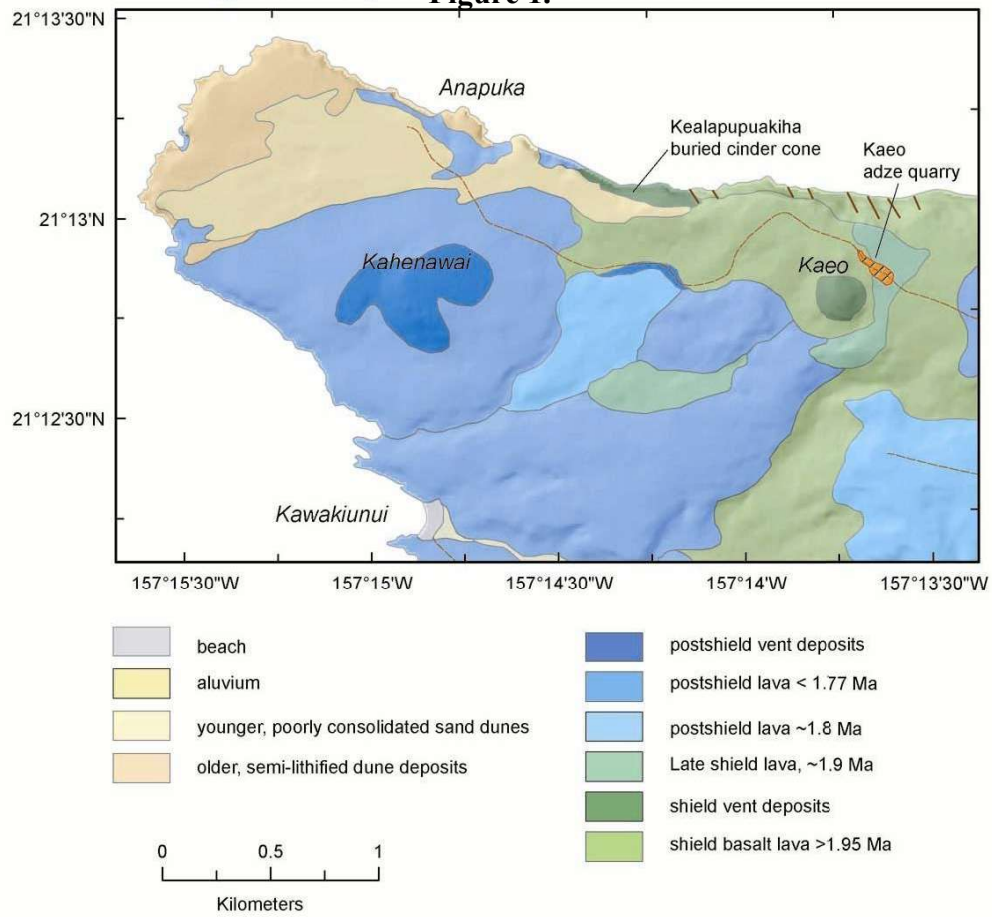
Map Created 3.16.09  
Forestry and Wildlife  
(808) 587-4170

## Legend

-  Proposed NAR or Wildlife Sanctuary
-  Molokai parcels
-  4WD roads

**Figure 2.**

**Geological Map of Northwest Molokai**



Geological Map by John Sinton, 2009. University of Hawaii, Unpublished.

Attachment 2

LINDA LINGLE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI  
FIRST DEPUTY

KEN C. KAWAHARA  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

February 8, 2010

Chairperson and Members  
Board of Land and Natural Resources  
State of Hawai`i  
Honolulu, Hawai`i

Land Board Members:

SUBJECT: MASTER'S REPORT ON PUBLIC HEARING

In accordance with HRS §195-4 (b), a Notice of Public Hearing was published in newspapers on October 16, 2009, and as authorized by the Board of Land and Natural Resources on September 25, 2009, I have conducted a public hearing relative to the proposed set aside of approximately 261 acres, TMK (2) 5-1-002:006 for Ilio Point Natural Area Reserve. This hearing took place on November 9, 2009 at 5:30pm at the Mitchell Pauole Center, Kaunakakai, Molokai.

Attached are minutes of the hearing.

A handwritten signature in black ink, appearing to read "W.D. Evanson".

William Evanson,  
Natural Area Reserves System Maui Program Manager

**PUBLIC HEARING FOR `ILIO POINT NATURAL AREA  
RESERVE,  
Mitchell Pauole Center, Kaunakaka`i, Moloka`i, November 9, 2009**

Hearing Office (HO) William Evanson called the hearing to order promptly at 5:30 p.m., reading from a script that this is a formal hearing for a public set aside, stating that he was appointed as Hearing Officer on behalf of the Board of Land and Natural Resources, followed by his introduction of Staff Emma Yuen and Betsy Gagné.

HO Evanson referred to sign-in sheets and sign up for testimony, as the purpose of this public hearing is to gather public comment on the proposal. The Natural Area Reserves System Commission recommended approval of the proposal at its August 25, 2009 meeting, and the Board of Land and Natural Resources at its September 25, 2009 meeting granted permission to hold a public hearing.

Prior notice of public hearing was advertised in papers of wide and local circulation on October 16, 2009, and press releases and information on the DLNR Website led to prior newspaper coverage in the *Molokai Dispatch* and *The Maui News* on the hearing and proposal.

This is a formal public hearing on the proposed set aside of approximately 261 acres, TMK (2) 5-1-002:006 for Ilio Point Natural Area Reserve.

HO Evanson outlined the procedures during the hearing. Conduct: those indicating a wish to testify will be called first before opening floor to others. Testimony will be limited to the subject. This hearing is to gather information; no rebuttals or cross-examination, hear all concerns and viewpoints.

HO Evanson introduced Staff Yuen to give a power point presentation on the proposal. Staff Yuen began the powerpoint proposal by announcing that copies of the proposal and rules were available as handouts; then reviewed the proposal and explained why `Ilio Point has been proposed to be designated as a Natural Area Reserve (NAR). The proposal included information on the biological and geological features, as well as past use and current no access policy due to UXO.

Public and written testimony will be included in the submittal that goes to the Land Board which can deny or recommend that it go to the Governor followed by Executive Order as a Natural Area Reserve.

Following NAR Designation, development of a Management Plan with public input; to preserve in perpetuity is the challenge.

Staff Yuen mentioned that there was a small flyer with the address for written testimony.

HO Evanson thanked her for the presentation then announced that it was Testimony time, and explained that he would call names in the order in which they signed up; to please state name, representation, followed by presentation of testimony.

**1. Ms. Joan Aidem** testified as an individual, and asked two questions: 1) For whom are we saving this area? 2) Who will be permitted to enter the area?

HO Evanson replied: for future generations.

Ms. Aidem: Will anyone get to go out there, or only for Native Hawaiian gathering rights?

HO Evanson: Will address that if it becomes a NAR.

Ms. Aidem then read a detailed passage from the Prodrumus of the fossil avifauna of the Hawaiian Islands, published by the Smithsonian Institution in 1982, by Storrs Olson and Helen James describing the bird bones and land snails that were found at `Ilio Point by herself and others and described by Olson and James.

**2. Mr. Michael Grinnell** said he was just present to listen, had no comments, but was in favor of it.

**3. Mr. Eugene Kirkham** said he did not wish to testify.

**4. Mr. William Garnett** testified as an individual and on behalf of `Ilio Point which he has been proposing for the past 16 years; he pointed out that Ms. Aidem took him there on his first visit. The area needs to be protected, it is only a little bit of what used to be; it can be taken care of without much work, which could be done by the community. Need to keep pressure on the Congressional Delegation for funding to de-dud and take care of the area.

**5. Mr. Butch Hasse** testified as an individual and also works with Moloka`i Land Trust (MLT), which is doing some dune restoration and keawe control on MLT lands, and also went on the site visit with NARS staff and others. It is a gem of a place, important to halt the onslaught of invasive species and he supports the Reserve.

**6. Mr. William Kaholoaa** was opposed to some of the proposals made this evening. The community of Moloka`i have some say in what they want. If this becomes a conservation area where will that put us, as trespassers? Why did the State accept it without it being cleaned up, and now we get kicked out? I am opposed because the proposal came form NARS not from the Moloka`i Community. NARS did not do enough public outreach to the Moloka`i community, since no flyers were posted around the town. That is how people in Molokai hear the news and without flyering no one knows about this. We love our native species. I see these white people here this evening and it bothers me that they can go and we are excluded; everything is for everyone, not one individual. Native species should be cared for by Native Hawaiians. Access: bombs; now we can't go and been going for years. We are simple people, don't need money, just food; hard to

accept proposals unless from Moloka`i, but now with this meeting maybe this can help benefit us.

Mr. Haase asked if high tide gathering area was not affected.

HO Evanson said it was outside the scope of this Hearing.

Mr. Kaholoaa said that the whole island, not just the shoreline, blow up ancestors, now how government throws the burden on us and kicks us out. Access is wherever we want to go not high tide mark.

**7. Mr. Halona Kaopuiki** testified on behalf of himself and his ancestors buried there; a chiefly line, but respect the laws. He asked about the size of the area.

HO Evanson said it was 261 acres, the northwest tip where the government signs an the Loran Station are.

Mr. Kaopuiki had heard rumors of bombing from years before and was concerned about the rare plants and would this be a Sanctuary.

HO Evanson replied Natural Area Reserve.

Mr. Kaopuiki asked if it would include the ocean.

HO Evanson said no, only `Ahihi-Kina`u NAR currently includes a marine portion.

Mr. Kaholoaa asked how far up.

HO Evanson replied high water mark.

Mr. Kaopuiki said that la`au lapa`au, certain plants, are important for cancer and other cures and they need to be protected; need to clean the area up; (they have) messed up our cultural resources. Grandfather's line took care of the bones; honor those that want to take care of the land; also want some protection in the marine area too. Other boats are coming in now from elsewhere, need to protect native fishing. We have songs and chants and oral histories important for our cultural survival. Mahalo for you coming; you come back again?

HO Evanson said yes, as a more informational and informal meeting.

**Mr. Joe Kennedy** said that everyone needs to work together on this to clean up the land, stay on the same track.

HO Evanson asked if there were any others wishing to testify; if not, Mr. Kennedy was the last testifier and this would conclude the formal Public Hearing at 6:17 p.m. He thanked everyone for attending and participating.

## **Summary of Written Comments Received: Ilio Point NAR**

*Clyde Namuo, Office of Hawaiian Affairs - September 4, 2009*

OHA is supportive of efforts to protect a biodiverse coastal area with rare species that are of great importance to our beneficiaries. Area is heavily used for constitutionally protected practices and OHA seeks to ensure rights not infringed. How will managers balance access and use with protective efforts? Fencing is proposed and we express caution regarding access issues (one-way gating, predator proof step-overs) and other cultural concerns with fencing a heavily used area be adequately addressed. Those who use the area and Native Hawaiians in particular should be made aware of proposal and consulted. The proposal only lists agencies that have been consulted which raises concerns that our beneficiaries interests are being considered.

*Note: letter received commenting on BLNR authorization for a public hearing, prior to public review process.*

*Patrick Conant - November 8, 2009*

Recommended adding Ilio Point to Natural Area Reserve System. Noted that Ilio Point provides habitat to many native flora and fauna, and they need protection. Noted that geological features such as bones of several species of long extinct native Hawaiian birds have been found in the dunes of Ilio Point and need to be protected from development.

*Lydia Garvey – November 8, 2009*

Recommended designating Ilio Point as a NAR. Stated this would protect and preserve the land for future generations. Requested that public lands, waters and wildlife be protected.

*MACZAC – January 13, 2010*

Recommended that future management be guided by the Ocean Resources Management Plan (ORMP), specifically the integration of management with mauka and makai resources as well as creating new governance mechanisms for community participation in management, such as the Aha Kiolo model. Area is used by local community for subsistence and Kaluakoi community should be part of planning, implementation, and decisionmaking structure for the NAR.

*Joshua Strickler, Esq. P.E., Department of Business, Economic Development and Tourism – November 6, 2009*

Concerned about making Ilio Point a reserve because it will have to be eliminated as a landing site for the proposed interisland cable. Informed that as part of the proposed EIS for the Interisland Cable and the overall Interisland Wind project, it is in the plan to conduct extensive biological and cultural studies on Ilio Point. Ilio Point a critical landing site for getting on to Molokai and connecting to the proposed First Wind project. Because the reef is thinner at Ilio Point it may be possible to tunnel underneath the reef without impacting any corals a feature other parts of the island does not have. Concerns about attending the hearing, wants to be informed as soon as the next hearing is planned.

*Linda Pratt – November 20, 2009*

Strong support for the addition of Ilio Point on the island of Molokai into the Natural Area System. Noted the site is well qualified to become a NAR because of its unique geology, native plant communities, potential importance to native wildlife, and the presence of archeological and cultural features. Expresses hope that access to fishing grounds can be maintained along the

coast of the point due to the importance to the fishermen and local people of Molokai. Express the idea that if access can be maintained or improved, many other people of Moloka'i are likely to support Ilio Point as a NAR.

*Marjorie Ziegler, Conservation Council for Hawaii – November 20, 2009*

Expresses support for the addition of Ilio Point, Molokai to the Natural Area Reserves System. Notes that the purpose of the Natural Area Reserves System is to protect native Hawaiian ecosystems and geologic sites for future generations. Addresses that there are significant geological features, rich coastal vegetation, seabird habitat and that the point hold cultural significance. Notes that protecting this area would ensure the prevention of inappropriate development.



**SUMMARY OF PUBLIC INFORMATIONAL MEETING  
FOR `ILIO POINT NATURAL AREA RESERVE,  
Mitchell Pauole Center, Kaunakaka`i, Moloka`i, November 18, 2009;  
6:00pm – 8:00 pm.**

The above-referenced Meeting was conducted by NARS Staff in the interest of satisfying concerns expressed at a November 9, 2009 Public Hearing on the same issue. Legal Notice requirements were fulfilled prior to that Hearing but, it was complained and commented at the Hearing that no flyers were posted on community bulletin boards around town which are a primary means for communicating in relatively small towns such as found in Kaunakakai, Molokai.

Prior to the Meeting, to gain more public trust and support for the proposal, NARS Staff agreed to work with the concerned and interested parties from the Hearing to 1) schedule another meeting to allow for the community to ask questions and for staff to be able to answer them (no Q & A allowed at Hearings), 2) to make contact with suggested interested or concerned parties such as lineal descendants from the area and cultural practitioners and 3) get community assistance on the actual posting of flyers around town noticing the Meeting on what they perceived to be the main bulletin boards.

As a result, a total of eleven individuals attended the Meeting, six of whom had not attended prior Public Hearing. The Meeting was conducted in an informal manner but, with a sign in sheet and notes taken. A large aerial photo of the area was posted and Maui District NARS Program Manager Bill Evanson started by providing background information on the proposal and process to date with the assistance of NARS Program Manager Randy Kennedy.

In attendance were Molokai residents and community activists contacted by staff prior to the Meeting, as suggested by other residents, including representatives of the Hawaiian Learning Center, and Hui Malama Mo`omomi.

Round table discussion involved individuals introducing themselves and expressing their interests or concerns. Issues focused on 1) their ability to continue to access the area and conduct cultural practices there, primarily the gathering of marine resources, their value and the need to conserve/protect those resources; 2) request to work closely with the Molokai community on proposed management plans and activities, including incorporating their shared knowledge of the area; 3) recognition of lineal descendants from the area and 4) an incorporation of the State of Hawaii Ocean Resources Management Plan Goals and Objectives into any future NARS management plans and activities.

Result was that NARS Staff listened to and agreed to all of the requests expressed and noted above with the caveat and fact that public access to the area currently and for some time now is and has been restricted due to the presence of unexploded ordinance and will continue to be subject to that limitation until otherwise dealt with.



**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
711 KAPI'OLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

HRD09/4657

September 4, 2009

Emma Yuen  
Department of Natural Resources  
1151 Punchbowl Street, Room 325  
Honolulu, Hawai'i 96813

**RE: Request for comments on the request regarding designation of Ilio Point to a Natural Reserve Area, Moloka'i, TMKs: 2-5-100:206 and 1-1-001:001.**

Aloha e Emma Yuen,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated July 20, 2009. OHA has reviewed the project and offers the following comments.

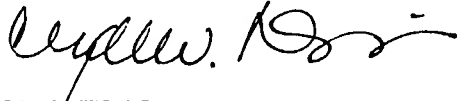
Naturally OHA is supportive of efforts that will protect a biodiverse coastal area with rare species that are of great importance to our beneficiaries. We do see, however, that this area is heavily used for constitutionally protected practices and we seek to ensure that these rights are not infringed.

For example, we ask how managers will balance access and use with their protective efforts. We do note that fencing is proposed and we express caution regarding not only access issues in terms of one-way gating and predator proof step-overs so that access is provided while still securing the area, but also urge that other cultural concerns with fencing a heavily used area can raise be adequately addressed. As such, we ask if those that use the area and Native Hawaiians in particular have been made aware of this proposal and consulted with for it. We point out that section VI. PUBLIC SUPPORT of Exhibit 2 lists only agencies, which raises concern for OHA in terms of ensuring that our beneficiaries' interests are being considered.

Emma Yuen  
September 4, 2009  
Page 2

Thank you for the opportunity to comment. If you have further questions, please contact Grant Arnold by phone at (808) 594-0263 or e-mail him at [granta@oha.org](mailto:granta@oha.org).

'O wau iho nō me ka 'oia'i'o,

A handwritten signature in black ink, appearing to read "Clyde W. Nāmu'o". The signature is fluid and cursive, with a long horizontal stroke at the end.

Clyde W. Nāmu'o  
Administrator

C: OHA Moloka'i CRC



# Conservation Council for Hawai'i

November 20, 2009

Laura Thielen  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, HI 96809

Attn: Emma Yuen

Aloha. The Conservation Council for Hawai'i supports the addition of 'Ilio Point, Moloka'i and the Kahauale'a extension to the Natural Area Reserves System for the following reasons.

## 'Ilio Point

- The purpose of the Natural Area Reserves System (NARS) is to protect native Hawaiian ecosystems and geologic sites for future generations.
- The nominated 261-acre 'Ilio Point Natural Area Reserve on west Moloka'i contains significant geological features, such as lithified sand dunes, sea cliffs, subfossil bird bones, and land snails. The coastal vegetation is particularly rich, with 23 native Hawaiian plant species, some of which are extremely rare and found only on Moloka'i. Much of Hawai'i's coast and the native ecosystems it supports has been destroyed by land development.
- The sand dunes and cliffs at 'Ilio Point could support abundant seabird populations if threats to the birds are controlled. The endangered 'ilioholoikauaua (Hawaiian monk seal) also has been seen resting at 'Ilio Point.
- 'Ilio Point is also culturally significant and an ancient legend of a red dog is associated with it. The area supports plants and animals that Hawaiians traditionally collect for practical, medicinal, decorative, and spiritual uses. Preservation of these species is essential to the continuation of traditional Hawaiian cultural practices.



**Hawai'i's Voice for Wildlife – Ko Leo Hawai'i no na holoholona lohiu**

Telephone/Fax 808.593.0255 • email: [info@conservehi.org](mailto:info@conservehi.org) • web: [www.conservehi.org](http://www.conservehi.org)  
P.O. Box 2923 • Honolulu, HI 96802 • Office: 250 Ward Ave., Suite 212 • Honolulu, HI 96814  
President: Maura O'Connor \* Treasurer: Kim Ramos \* Secretary: Douglas Lamerson  
Directors: Madelyn D'Enbeau \* Maka'ala Ka'aumoana \* Hannah Springer  
Executive Director: Marjorie Ziegler

Hawai'i Affiliate of the National Wildlife Federation

## **'Ilio Point cont.**

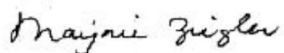
- Some of the plants at 'Ilio Point are considered sacred to certain gods or because they are associated with cultural practices. Pa'u o Hi'iaka is associated with a legend about goddesses Hi'iaka and her sister Pele. Pili grass was widely used by Hawaiians for thatch and house construction, and 'ilima papa is popular for making lei.
- Designating 'Ilio Point as a Natural Area Reserve will help prevent inappropriate development of this sensitive and special area.

## **Kahauale'a Extension**

- The proposed 5,795-acre Kahauale'a extension includes one of the most active volcanic sites in the world, and lava flows of different ages cover the site.
- The Kahauale'a extension also includes high-quality native forest between the existing Kahauale'a NAR and Hawai'i Volcanoes National Park.
- The Kahauale'a extension includes recovery habitat for the endangered Hawai'i creeper and endangered 'akepa; a vital forest bird habitat corridor for the 'oma'o, 'apapane, 'elepaio, 'amakihi, 'iwi, and 'io; and critical habitat for 3 endangered Hawaiian plant species. Listed and candidate endangered plants found there include Hawaiian ferns, mints, and hardwood trees.
- The area is also likely to contain many of the known insects and other invertebrates found nearby. Of particular scientific interest and uniqueness are the aeolian (wind-blown) lava fields, which are colonized by arthropods quickly after eruptions, and may be the primary habitat for a unique Hawaiian cricket and a native wolf spider.
- This area has been considered for geothermal exploration, which would disrupt and change the face of this undeveloped area if that were to occur, and put Kahauale'a and Hawai'i Volcanoes National Park at risk to further invasion of invasive species and habitat fragmentation and loss.

Thank you for the opportunity to support this significant proposal.

Sincerely,



Marjorie Ziegler



# Marine and Coastal Zone Advocacy Council *Ke Kahu O Na Kumu Wai*

January 13, 2010

**MACZAC Members:**

Maui

Donna L. Brown (chair)  
James E. Coon (vice-chair)  
Henry T.S. Lau

Lanai

Robin Kaye

Molokai

Walter Ritte

Oahu

Susan A. Sakai  
Donna Wong

Hawaii Island

Kanoa Withington  
Mike Gleason

Kauai

Rhoda Makanani Libre  
Makaala Kaaumoana

Staff

Jessica C. Stabile

Emma Yuen, NARS Enhancement Coordinator  
Bill Evanson, Maui NARS Manager  
Natural Area Reserve System (NARS)  
Division of Forestry and Wildlife, DLNR  
1151 Punchbowl Street, Room 325  
Honolulu, HI 96813

## Proposed Set Aside of 261 Acres (TMK 2-5-1-002:006), Molokai for the Ilio Point Natural Area Reserve

Dear Emma Yuen and Bill Evanson,

Pursuant to HRS §205A-3.5, the Marine and Coastal Zone Advocacy Council (MACZAC) is a statutorily created public advisory body to the Hawai'i Coastal Zone Management Program within the State Office of Planning.

MACZAC would like to recommend that the designation of State owned lands at Ilio Point Molokai (TMK 2-5-1-002:006) to a Natural Area Reserve include recommendations from the Hawai'i Ocean Resources Management Plan (ORMP), an integrated and place-based approach to natural and cultural resources management. These ORMP recommendations were also supported by Molokai community members at your public meetings in November 2009.

The ORMP is a statewide plan mandated by HRS §205A that utilizes collaboration among jurisdictional authorities and builds upon community partnerships. The ORMP is based on traditional Hawaiian resource management principles and uses a three perspective framework – Perspective 1: Connecting Land and Sea (“Careful and appropriate use of the land is required to maintain the diverse array of ecological, social, cultural, and



**MACZAC**

**MACZAC Members:**

Maui

Donna L. Brown (chair)  
James E. Coon (vice-chair)  
Henry T.S. Lau

Lanai

Robin Kaye

Molokai

Walter Ritte

Oahu

Susan A. Sakai

Donna Wong

Hawaii Island

Kanoa Withington

Mike Gleason

Kauai

Rhoda Makanani Libre

Makaala Kaaumoana

Staff

Jessica C. Stabile

## Marine and Coastal Zone Advocacy Council *Ke Kahu O Na Kumu Wai*

economic benefits we derive from the sea"); Perspective 2: Preserving Our Ocean Heritage ("A vibrant and healthy ocean environment is the foundation for the quality of life valued in Hawai'i and the well-being of its people, now and for generations to come"); and Perspective 3: Promoting Collaboration and Stewardship ("Working together and sharing knowledge, experience and resources will improve and sustain our efforts to care for the land and the sea").

MACZAC recommends including Perspective 1: Connecting Land and Sea, as a guiding principle in the NARS designation. Taking a mauka to makai approach, this perspective follows the traditional Hawaiian ahupua'a management system whereby the watershed and adjacent ocean area are managed as an integrated land-sea system. Land use affects the coastal environment, shoreline areas and marine life. Thus, an integrated and place-based approach to resource management is appropriate.

MACZAC further recommends the inclusion of Perspective 3: Promoting Collaboration and Stewardship, as a guiding principle in the NARS designation. This perspective recognizes the need for a holistic and integrated approach to resource management that utilizes collaborative governance mechanisms to provide greater opportunities for public involvement and capacity-building for community participation and stewardship. This emphasis on collaboration acknowledges that place-based resource management cannot succeed without acceptance and commitment from local community members.

The ORMP recommends the development of new governance mechanisms that provide for greater collaboration among all stakeholders. MACZAC asks that DLNR adopt a governance mechanism for the Ilio Point NAR that utilizes integrated resource management (mauka to makai), and builds capacity for community participation in resource management of that land-sea system. In adopting the holistic stewardship approach advocated by the



**MACZAC**

**MACZAC Members:**

Mau

Donna L. Brown (chair)  
James E. Coon (vice-chair)  
Henry T.S. Lau

Lanai

Robin Kaye

Molokai

Walter Ritte

Oahu

Susan A. Sakai

Donna Wong

Hawaii Island

Kanoa Withington

Mike Gleason

Kauai

Rhoda Makanani Libre

Makaala Kaaumoana

Staff

Jessica C. Stabile

## Marine and Coastal Zone Advocacy Council *Ke Kahu O Na Kumu Wai*

ORMP, the Ilio Point NAR would be a significant step in demonstrating a planning process based on collaborative government-community partnership and place-based resource management, and would provide a model for future partnerships throughout Hawaii.

In sum, Ilio Point cannot be managed without taking into consideration both the land and sea. This is a land mass surrounded on three sides by the sea. This area is used by the local community for subsistence both on the land, along the coastline and in the sea. The community living in this ahupua'a of Kaluako'i needs to be part of the planning, implementation and decision-making structure for this Natural Area Reserve. The Aha Kiole model would work well for this ahupua'a. All of these issues are addressed by the Hawaii's ORMP, a document endorsed by the State Legislature and supported by DLNR. Indeed, it was Laura Thielen, then Director of the State Office of Planning, that penned the opening letter introducing the ORMP (available at [http://www.state.hi.us/dbedt/czm/ormp/reports/ormp\\_2006.pdf](http://www.state.hi.us/dbedt/czm/ormp/reports/ormp_2006.pdf)).

Thank you in advance for considering these suggestions from MACZAC.

Sincerely,

Donna L. Brown, MACZAC chair

Walter Ritte, Molokai representative for MACZAC