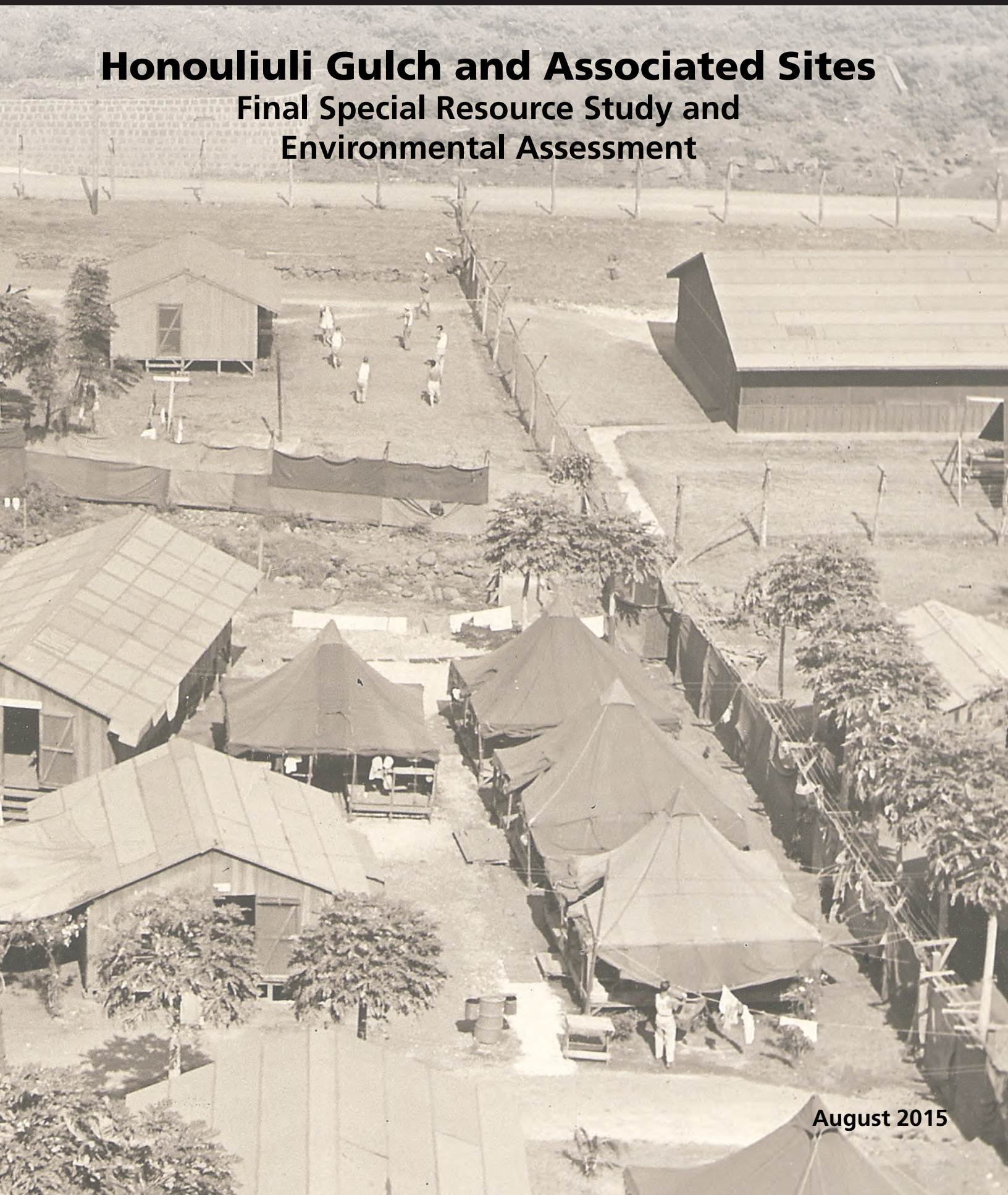
National Park Service
U.S. Department of the Interior

Honouliuli Gulch and Associated Sites

Final Special Resource Study and Environmental Assessment

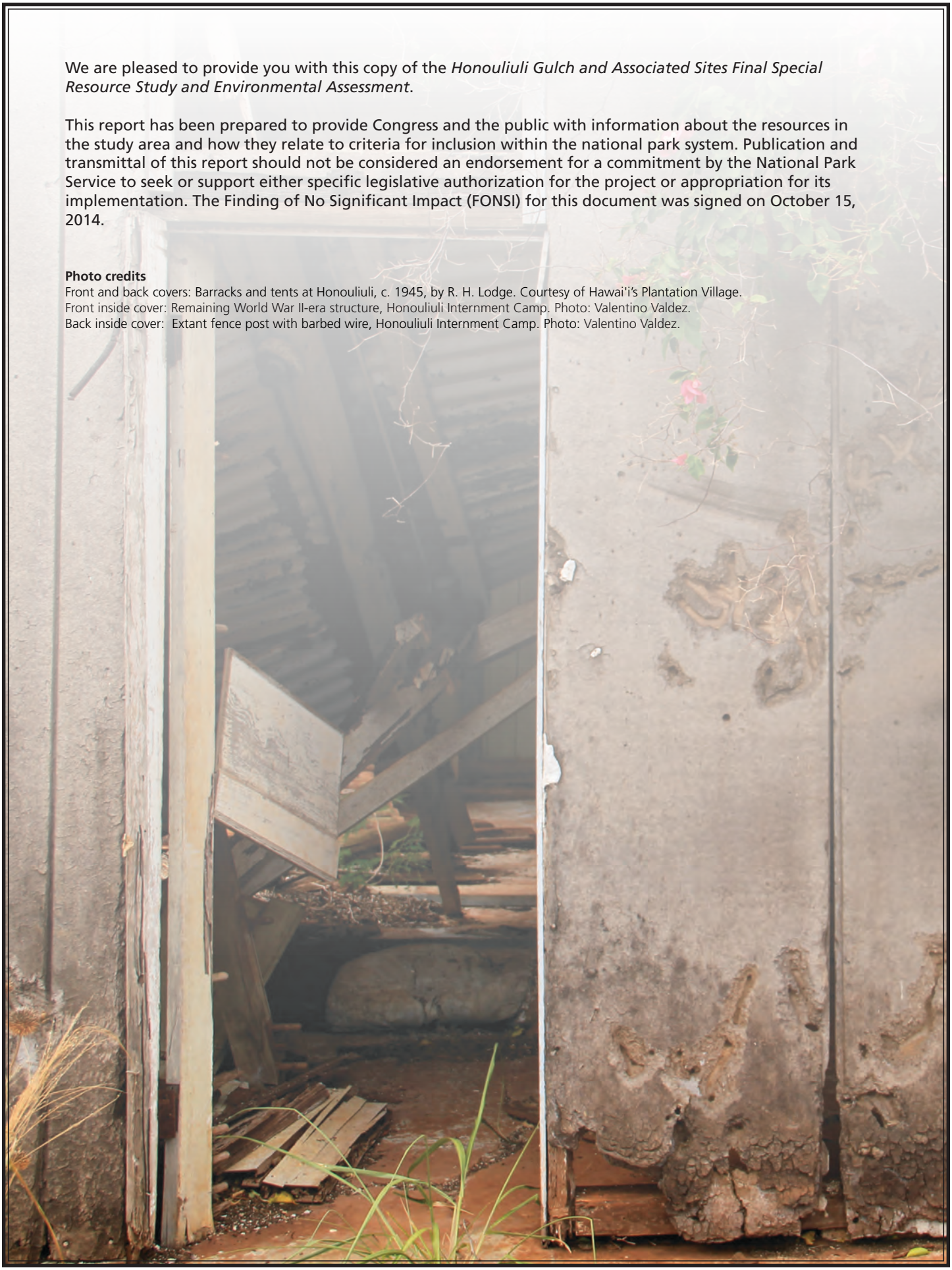


August 2015

We are pleased to provide you with this copy of the *Honouliuli Gulch and Associated Sites Final Special Resource Study and Environmental Assessment*.

This report has been prepared to provide Congress and the public with information about the resources in the study area and how they relate to criteria for inclusion within the national park system. Publication and transmittal of this report should not be considered an endorsement for a commitment by the National Park Service to seek or support either specific legislative authorization for the project or appropriation for its implementation. The Finding of No Significant Impact (FONSI) for this document was signed on October 15, 2014.

Photo credits
Front and back covers: Barracks and tents at Honouliuli, c. 1945, by R. H. Lodge. Courtesy of Hawai'i's Plantation Village.
Front inside cover: Remaining World War II-era structure, Honouliuli Internment Camp. Photo: Valentino Valdez.
Back inside cover: Extant fence post with barbed wire, Honouliuli Internment Camp. Photo: Valentino Valdez.



HONOULIULI GULCH AND ASSOCIATED SITES

Final Special Resource Study and Environmental Assessment

AUGUST 2015

Produced by the Pacific West Regional Office
Park Planning and Environmental Compliance
San Francisco, CA and Seattle, WA
National Park Service

U.S. Department of the Interior
Washington, DC

Final Special Resource Study and Environmental Assessment for

HONOULIULI GULCH AND ASSOCIATED SITES

August 2015

The National Park Service (NPS) prepared the *Honouliuli Gulch and Associated Sites Special Resource Study and Environmental Assessment* to determine whether the Honouliuli Internment Camp and associated World War II internment sites in Hawai‘i are nationally significant, suitable, and feasible for inclusion in the national park system. Congress authorized this study in 2009. The study evaluates 17 sites.

Through the special resource study process, the NPS made the following determinations about the study sites:

- The Honouliuli Internment Camp and the U.S. Immigration Station on the island of O‘ahu are **nationally significant** for their central role as internment sites in Hawai‘i during World War II. They meet all four of the NPS criteria for national significance. The other 15 sites associated were used for shorter periods of time, interned fewer numbers of people, or have been substantially changed since the period of significance. As such, they do not meet the criteria for national significance. Many of these sites are, however, listed or eligible for listing in the National Register of Historic Places and/or provide opportunities to further interpret the history of internment in Hawai‘i during World War II.
- The Honouliuli Internment Camp and the U.S. Immigration Station depict a distinct and important aspect of American history associated with civil liberties in times of conflict that is not adequately represented or protected elsewhere, and are therefore **suitable for inclusion** in the national park system.
- The Honouliuli Internment Camp historic site **is a feasible addition** to the national park system conditional upon securing public access to the site. The U.S. Immigration Station complex is not a feasible addition to the national park system because the complex is currently used by the U.S. Department of Homeland Security and the State of Hawai‘i Department of Health.
- There is a **need for NPS management** of the Honouliuli Internment Camp historic site in partnership with others to fully protect resources and to enhance visitor appreciation of the nationally significant resources and important stories associated with it.

The NPS evaluated two alternatives in the study. One includes a role for the NPS.

Alternative A: Continuation of Management. This is the “no action” alternative. Sites, organizations, and programs significant to the internment history in Hawai‘i would continue to operate independently by existing landowners, agencies, or organizations without additional NPS management or assistance other than what is currently available through existing authorities and grant programs.

Alternative B: Honouliuli National Historic Site or Monument–A Unit of the National Park System. Congress would establish Honouliuli National Historic Site as a new unit of the national park system. Alternatively, a national monument managed by the NPS could be established. The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that provide access and opportunities for visitor facilities. The NPS would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai‘i during World War II. The national historic site or monument would be supported by operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor. The NPS could provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai‘i during World War II.

The NPS prepared an environmental assessment to identify and analyze the potential environmental and socioeconomic consequences of the two alternatives. The NPS concluded that alternative B would be the environmentally preferable alternative because it would protect nationally significant resources, provide opportunities for visitors to learn about the internment history in Hawai‘i during World War II, provide greater socioeconomic benefits, and apply long-standing NPS policies and actions to the Honouliuli Internment Camp historic site.

View west from the bottom of Honouliuli Gulch. The landforms comprising the gulch create a strong sense of enclosure. Photo: NPS, 2013.

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TERMINOLOGY

Many different words have been used and continue to be used to describe the U.S. government's wartime policies toward Japanese Americans and legal resident aliens of Japanese ancestry. Highly charged debates over words and terminology continue to reflect intense feelings and diverse perspectives about what occurred during World War II. To fulfill its responsibilities to the public, the National Park Service acknowledges the diversity of perspectives and opinions about the meaning and significance of this varied terminology and encourages education, reflection, and discussion about this aspect of American history.

Words used to describe the forced removal of people from their homes and communities and their subsequent imprisonment include: exclusion, evacuation, relocation, detention, confinement, incarceration, and internment. The people themselves have been referred to as evacuees, detainees, inmates, internees, non-aliens, prisoners, and incarcerees. The people have also been described as Japanese, Japanese Americans, Japanese legal resident aliens, Nikkei, and by their generation in the United States—Issei (first generation) and Nisei (second generation). Finally, the facilities used to implement the government's policies have been called assembly centers, camps, concentration camps, incarceration camps, internment camps, prisons, relocation centers, and War Relocation Authority centers. Although these various terms exist today, it is now widely accepted that the U.S. government purposefully used euphemistic terminology to mislead the American public about the severity of and justifications for its actions during World War II.

Differences also exist in the terminology used both historically and currently to describe what occurred on the U.S. mainland in comparison with Hawai'i. On the mainland, Executive Order 9066 was the legal authority for the mass removal and imprisonment of 120,000 people of Japanese ancestry. The term "internment" is commonly used to describe this history, though "internment" is misleading in this context. "Internment" refers to the legally permissible detention of enemy aliens in wartime. It is problematic because two-thirds of those incarcerated under Executive Order 9066 were American citizens by birth and the remaining one-third were Japanese nationals ineligible for citizenship because of a discriminatory law that prevented their naturalization. In addition, the vast majority of Japanese Americans who were incarcerated were not legally processed through hearings or trials as enemy aliens. For these reasons, there has been support for using terms without a legal connotation, such as incarceration, imprisonment, and detention.

In Hawai'i, discussions have begun about terminology to describe the events, locations, and people who were forcibly detained and imprisoned during World War II. "Internment" and "detention" (and their derivatives: internment camp, internee, detention camp, and detainee) are the most frequently used terms. These words are generally accurate when used in the context of martial law, which was the legal mechanism for removing and imprisoning American citizens and resident aliens of Japanese and European ancestry in Hawai'i. Martial law gave the military authority over the civilian population. This resulted in the closing of civilian courts and the establishment of military-run courts. Each incarcerated individual, whether an American citizen or foreign national, received a legal hearing first by a civilian court and then, if warranted, by a military review board. Those identified as enemy aliens, potentially dangerous, and suspicious of disloyalty were interned.

During World War II, the Honouliuli site was referred to by various names in army documents and consular reports. It was called "Camp Honouliuli," "Internees Compound #6," "Honouliuli Internment Camp," "Alien Internment Camp," and "Honouliuli Camp." While the military interned both American citizens and civilians of Japanese and European ancestry at Honouliuli, the larger population was composed of prisoners of war. According to the Convention of 1929 relative to the Treatment of Prisoners of War, 118 L.N.T.S. 343, entered into force June 19, 1931, prisoners of war were subject to "internment" and may "be interned in fenced camps." The Geneva Convention of 1949 also used "internment" as the definition for incarcerating prisoners of war.

For the purposes of this study, the National Park Service uses "internment" to describe the process by which civilians were removed and imprisoned in Hawai'i. "Incarceration" is used when describing the mass removal and imprisonment on the mainland and to describe this process as a concept or series of events. This document also uses historically used terms, depending on the specific context and the sources used and cited.

We acknowledge that readers may not always agree with the use of certain words in specific contexts.

ACRONYMS AND ABBREVIATIONS

ACHP – Advisory Council on Historic Preservation

ACOE – U.S. Army Corps of Engineers

ALISH – Agricultural Lands of Importance to the State of Hawai‘i

BLM – Bureau of Land Management

BWS – City and County of Honolulu Board of Water Supply

CAA – Clean Air Act

CEQ – Council of Environmental Quality

CFR – Code of Federal Regulations

CWA – Clean Water Act

CWRIC – Commission on Wartime Relocation and Internment of Civilians

DO – Director's Order

DOJ – Department of Justice

EA – Environmental Assessment

EIS – Environmental Impact Statement

EO– Executive Order

EPA– U.S. Environmental Protection Agency

ESA– Endangered Species Act

FBI – Federal Bureau of Investigation

FEMA– Federal Emergency Management Agency

FHA – Federal Highway Administration

FR – Federal Register

HRT – Hawai‘i Rail Transit

JACS – Japanese American Confinement Sites

JCCH – Japanese Cultural Center of Hawai‘i

NEPA – National Environmental Policy Act

NHL – National Historic Landmark

NPS – National Park Service

NRHP – National Register of Historic Places

POW – prisoner of war

PEPC – National Park Service Planning, Environment and Public Comment Website

PL – Public Law

SHPO – state historic preservation officer

SRS – Special Resource Study

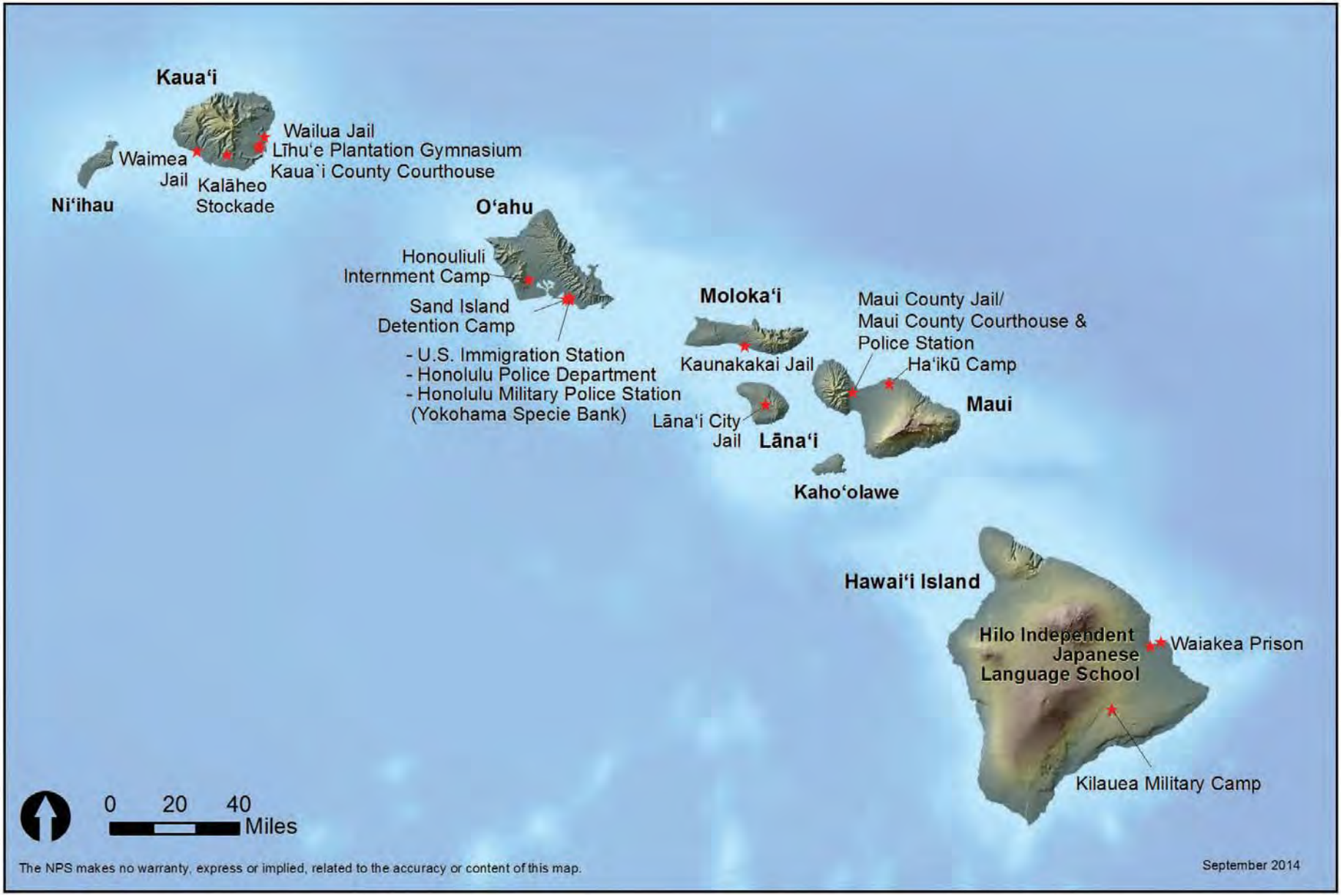
T & E species – threatened and engangered species

UHWO – University of Hawai‘i–West O‘ahu

USDA – U.S. Department of Agriculture

WRA – War Relocation Authority

WWII – World War II



Confinement sites in Hawai'i during World War II.

EXECUTIVE SUMMARY

Background and Study Process

The Department of the Interior, Environment, and Related Agencies Appropriations Act of 2010, Title 1, Section 125 (123 Stat. 2932), October 30, 2009) authorized the National Park Service (NPS) to "conduct a special resource study of the national significance, suitability, and feasibility of including the Honouliuli Gulch and associated sites within the State of Hawai'i in the National Park System." The legislation stated, "The study shall evaluate the Honouliuli Gulch, associated sites located on O'ahu, and other islands located in the State of Hawai'i with respect to—

1. the significance of the site as a component of World War II;
2. the significance of the site as related to the forcible internment of Japanese Americans, European Americans, and other individuals; and
3. historic resources at the site."

This legislation was introduced in the Senate by Senator Daniel Inouye and Senator Daniel Akaka of Hawai'i, and in the House by Representative Mazie Hirono and former Representative and current Hawai'i Governor, Neil Abercrombie, with numerous co-sponsors from across the United States and the Pacific territories (American Samoa, Guam, and the Northern Mariana Islands).

This study provides information to aid the National Park Service in determining whether the study sites meet eligibility, suitability, and feasibility criteria for designation as units of the national park system. The study follows the process established by the National Park System New Area Studies Act (P.L. 105-391, 16 U.S.C. Sec. 1a-5) and addresses the criteria for new areas outlined in NPS *Management Policies 2006*.

Legislative and Policy Direction

The National Park System New Area Studies Act requires that special resource studies be prepared in compliance with the National Environmental Policy Act (NEPA). The NPS determined that an environmental assessment (EA) is a sufficient level of environmental analysis for this study. This study complies with the National Historic Preservation Act, Section 106 and 110 requirements. Section 106 requires federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process is being coordinated with the National Environmental Policy Act process for this special resource study. No significant impacts or effects are anticipated from the findings and recommendations of this study.

According to NPS management policies, a proposed addition to the national park system will receive a favorable recommendation from the NPS only if it meets all of the following four criteria for inclusion:

- it possesses nationally significant natural or cultural resources;
- it is a suitable addition to the system;
- it is a feasible addition to the system; and
- it requires direct NPS management, instead of alternative protection by other public agencies or the private sector.

These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation's natural and cultural resources, while recognizing that there are other management alternatives for preserving the nation's outstanding resources.

Alternatives for NPS management are developed for sites that meet all four of the criteria for inclusion.

Public Involvement

PUBLIC SCOPING

The NPS launched public scoping for this study in February 2011. A notice of scoping was published in the *Federal Register* on May 2, 2011 (Vol. 76, No. 83, 24514–15). The study team produced and distributed an informational newsletter and press releases to the media, individuals, organizations, and government officials. Public information was made available on the National Park Service's Planning, Environment and Public Comment (PEPC) website and project website at www.nps.gov/pwro/honouliuli.

In February and March 2011, the study team held eight public scoping meetings on the six main islands in Hawai‘i. Over 100 people attended the public meetings. Local, state, and federal government officials and stakeholders were also consulted. During this time, numerous articles and opinion pieces about the study appeared in area newspapers.

The comment period for public scoping extended to June 1, 2011, thirty days after publication of the notice of scoping in the *Federal Register*.

Historical Background

Shortly after the surprise bombing of Pearl Harbor on December 7, 1941 by the Japanese Navy, the United States imposed martial law on the territory of Hawai‘i and formally entered into World War II. The U.S. military and FBI began rounding up and imprisoning persons of Japanese and European ancestry in Hawai‘i on suspicion of disloyalty to the United States. The legal authority in Hawai‘i for the internment was martial law, which began on December 7, 1941 and lasted until October 24, 1944. Initially internees were confined in local areas, mostly prisons, courthouses, and similar facilities throughout the Hawaiian Islands. Most were then sent to the U.S. Immigration Station on O‘ahu before being transferred to mainland internment camps. Of the 158,000 people of Japanese ancestry in Hawai‘i at the beginning of World War II, approximately 2,000 were interned.

On the mainland, all individuals of Japanese ancestry living in California, southern Arizona, the western halves of Washington and Oregon, and the territory of Alaska were forced from their homes by military exclusion orders following Executive Order 9066, issued on February 19, 1942. They were rounded up and sent to temporary detention centers and then to isolated large-scale camps located throughout the western states and Arkansas, where most would spend the duration of the war years. The mass incarceration of 120,000 persons of Japanese ancestry was the largest forced removal of people in the history of the United States.

In Hawai‘i, by March 1943, Honouliuli Internment Camp had been constructed on O‘ahu to intern citizens, resident aliens, and prisoners of war. The camp held approximately 400 internees and became the largest

Administration building, U.S. Immigration Station. Photo: NPS, 2013.

prisoner-of-war camp in Hawai‘i with nearly 4,000 individuals from Korea, Okinawa, Taiwan, Japan, and Italy. Honouliuli was the last, largest, and longest-used World War II confinement site in Hawai‘i; it closed in 1945 for civilian internees and may have been used into 1946 for prisoners-of-war.

More than 40 years after World War II, the Civil Liberties Act of 1988 was signed into law by President Ronald Reagan. It acknowledged the fundamental injustice of the mass incarceration based on race and formally apologized on behalf of the people of the United States. The act stated the World War II mass incarceration of Japanese Americans was the result of “racial prejudice, wartime hysteria and a lack of political leadership.”

Study Sites

The study evaluates 17 sites associated with the history of internment in Hawai‘i (See Map: Confinement sites in Hawai‘i during World War II). A preliminary list of 13 sites was developed based on information obtained through personal interviews, declassified documents from the Federal Bureau of Investigation and Department of Justice, military files, newspapers, photographs, and numerous books and essays. The University of Hawai‘i, Japanese Cultural Center of Hawai‘i, and Trans-Sierran Archaeological Research provided information about internment sites in Hawai‘i. Site visits by the study team were conducted where possible to determine current conditions and integrity of the sites. Four additional sites were recorded during the preparation of this report.

Study Findings

NATIONAL SIGNIFICANCE

The National Park Service (NPS) uses four basic criteria to evaluate the significance of proposed areas. These criteria, listed in the National Park Service *Management Policies 2006*, state that a resource is nationally significant if it meets all of the following conditions:

- It is an outstanding example of a particular type of resource.
- It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation’s heritage.
- It offers superlative opportunities for public enjoyment, or for scientific study.
- It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

The NPS evaluates national significance for cultural resources by applying the national historic landmarks (NHL) criteria contained in 36 CFR Part 65.

National Park Service professionals consult with subject matter experts, scholars, and scientists in determining whether a study area is nationally significant. Resource experts and scholars within and beyond the NPS contributed expertise, research, and technical review of the statement of significance.

NATIONALLY SIGNIFICANT SITES

The internment and incarceration of Japanese Americans and others during World War II on the mainland and in Hawai‘i are nationally significant events that shape our understanding and commitment to civil liberties and the fair treatment of all citizens, regardless of race. By identifying the commonalities and distinctions between mainland and Hawai‘i stories, this study concludes that the internment in Hawai‘i is of national significance, distinct from mainland incarceration. Through it, we are

Internees and others inscribed names and dates into cement features at Honouliuli Internment Camp during World War II. Inscription in the guard camp area. Photo: Burton and Farrell 2011.

able to more fully understand the abrogation of civil liberties that occurred in the U.S. and its territories.

More than 2,000 residents of Japanese and European ancestry living in Hawai‘i were incarcerated in at least seventeen locations in Hawai‘i during World War II, including Honouliuli Internment Camp, Sand Island, the U.S. Immigration Station, Honolulu Police Department, and Honolulu Military Police Station on O‘ahu; the Kilauea Military Camp, Waiākea Prison, and the Hilo Independent Japanese Language School on the island of Hawai‘i; Ha‘ikū Camp and Maui County Jail on Maui; the Kaunakakai Jail on Moloka‘i; the Lāna‘i City Jail on Lāna‘i; and the Kalāheo Stockade, Waimea Jail, Waialua Jail, Līhu‘e Plantation Gymnasium, and Kaua‘i County Courthouse on Kaua‘i.

The 17 internment sites in Hawai‘i were evaluated for their role and importance in telling the internment story. Based on the findings and analysis in this study, two sites, Honouliuli Internment Camp and the U.S. Immigration Station, are found to be nationally significant as defined in the NHL guidelines.

Honouliuli Internment Camp (Waipahu, O‘ahu)

The Honouliuli Interment Camp was located in Honouliuli Gulch, west of Waipahu, on the island of O‘ahu. Opened in 1943, the Honouliuli Internment Camp was the last, largest, and longest-used World War II confinement site in Hawai‘i. The camp was built to intern Japanese and European Americans, Japanese and European resident aliens, and POWs captured in military operations during World War II. Honouliuli Internment Camp, protected by its isolated location amidst agricultural lands and nearly hidden by dense vegetation for 60 years, appears to offer the greatest potential to preserve resources and interpret the history of the WWII internment.

The internment camp held approximately 400 internees, mostly second-generation Japanese Americans, but also Japanese, German, and Italian nationals. It was also the largest prisoner of war camp in Hawai‘i, incarcerating nearly 4,000 individuals. Recent archeological surveys have resulted in the identification of over 130 archeological features.

U.S. Immigration Station (Honolulu, O‘ahu)

The U.S. Immigration Station, located on Ala Moana Boulevard in Honolulu, is nationally significant as the location where all Hawai‘i internees were processed or temporarily incarcerated after the attack on Pearl Harbor on December 7, 1941. Unlike most of the other internment sites in Hawai‘i that only served local, short-term needs, the U.S. Immigration Station had a broad, statewide role over an extended period. It served as a temporary internment location, but also as a center of legal administration.

Other Internment Sites in Hawai‘i

The other 15 sites associated with internment considered in this study were used for shorter periods of time, interned fewer numbers of people, or have been substantially changed since the period of significance. As such, they do not meet the criteria for national significance as defined in the special resource study and national historic landmark criteria. Many of

Sand Island Internment Camp opened immediately after the attack on Pearl Harbor and detained internees until March 1, 1943. Photos: source unknown.

Kaunakakai County Courthouse on Moloka‘i was moved offsite in the years following its use as a temporary detention center for Moloka‘i residents of Japanese heritage. After detention in this building and the nearby Kaunakakai County Jail, internees were transferred to the Wailuku County Jail on Maui and later sent to O‘ahu. Photo: NPS, 2011.

these sites are, however, listed or eligible for listing in the National Register of Historic Places (NRHP) and/or provide opportunities to further interpret the story of internment and incarceration in the U.S. during World War II.

SUITABILITY

To be considered suitable for addition to the national park system, an area must represent a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector.

Adequacy of representation is determined for nationally significant sites on a case-by-case basis by comparing the potential addition to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The analysis results in a determination of whether the proposed new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

Honouliuli Internment Camp and the U.S. Immigration Station offer a special opportunity to expand our nation’s history of incarceration of civilians during World War II. The educational potential of these sites is enhanced by their quality, or high level of integrity, as well as the quantity of their extant resources. Based on the analysis of comparable resources and interpretation already represented in units of the national park system, or protected and interpreted by others, this study concludes that Honouliuli Internment Camp and the U.S. Immigration Station associated with the incarceration of civilians and prisoners of war in Hawai‘i during World War II depict a distinct and important aspect of American

history associated with civil liberties in times of conflict that is not adequately represented or protected elsewhere, and are therefore suitable for inclusion in the national park system.

FEASIBILITY

To be feasible as a new unit of the national park system, an area must be: (1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries), and (2) capable of efficient administration by the National Park Service at a reasonable cost.

In evaluating feasibility, the NPS considers a variety of factors for a study area, such as the following:

- Land use, current and potential site uses, ownership patterns, planning and zoning
- Access and public enjoyment potential
- Boundary size and configuration
- Existing resource degradation and threats to resources
- Public interest and support
- Social and economic impact
- Costs associated with operation, acquisition, development, and restoration

The feasibility evaluation also considers the ability of the NPS to undertake new management responsibilities in light of current and projected availability of funding and personnel. An overall evaluation of feasibility is made after taking into account all of the above factors.

Some management options are more feasible than others. The national park system includes many types of sites, and a range of ownership and management approaches. The NPS also offers grant and technical assistance programs that help local communities achieve their goals for conservation and recreation.

The feasibility analysis focuses on the two sites that have been found nationally significant, Honouliuli Internment Camp and the U.S. Immigration Station.

The NPS finds that **Honouliuli Internment Camp** is feasible as an addition to the national park system as long as public access to the site

Foundation of former mess hall, Honouliuli Internment Camp. Photo: NPS, 2013.

can be secured. Current land use, ownership patterns, and zoning associated with Honouliuli Internment Camp would not conflict with management of a national park unit. Primary resources associated with the camp are located on property owned by the Monsanto Company, which has expressed interest in donating the property to the NPS for establishment of a national park unit. Surrounding lands are currently in agricultural use which is compatible with the camp's historic setting. However, feasibility is conditional on securing public access to the site. As current access is primarily over unpaved agricultural roads, improvements would be needed to accommodate access by the general public. An appropriate boundary configuration would include the historic site and lands sufficient to provide access and visitor facilities such as parking areas.

There are no current threats to Honouliuli Internment Camp that would preclude management as a unit of the national park system. Honouliuli Internment Camp contains resources with integrity sufficient for national historic landmark designation and NPS designation.

Outreach for this study has demonstrated significant public interest and support for an NPS park unit at Honouliuli Gulch in partnership with other organizations and local communities. The social and economic impacts of NPS designation or other support/coordination roles appear to be largely beneficial and would support the feasibility of NPS designation.

With operational support from World War II Valor in the Pacific National Monument at Pearl Harbor, operational costs for establishing a national park unit appear to be feasible. Land acquisition costs would be minimal and limited to the administrative costs associated with a land transfer to the National Park Service.

The NPS finds that the **U.S. Immigration Station** is not feasible as an addition to the national park system because of existing uses by the U.S. Department of Homeland Security and the Hawai'i State Department of Health. If the facilities were no longer needed by federal or state agencies, additional analysis would be needed to determine the feasibility of management options and associated costs.

Photos (top to bottom): **1.** Post-World War II chicken shed built of scrap materials on Honuliuli Internment Camp-era concrete slab. **2.** Participant, Honouliuli Internment Camp Field Study, University of Hawai'i–West O'ahu, July 2010. Photos: Valentino Valdez.

Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration.

NEED FOR NPS MANAGEMENT

The need for direct NPS management is the final criterion for evaluating resources for potential designation as a new unit of the national park system. The criterion requires a finding that NPS management would be superior to alternative management arrangements by other entities.

Evaluation of the need for NPS management pertains to those resources that are determined to be nationally significant, suitable, and feasible for inclusion in the national park system. Based on these findings the need for NPS management focuses on Honouliuli Internment Camp. Associated sites would continue to be owned and operated by nonprofit organizations, private property owners, and other government agencies.

The owner of the Honouliuli site, the Monsanto Company, has expressed interest in donating the site to the United States for its long-term preservation. Other organizations have not been identified that would be willing to take on direct ownership and management of the site for public use, or to which the Monsanto Company would be willing to transfer the site. NPS planning and research capabilities, as well as historic preservation, cultural resource management, and interpretive and educational programming expertise would offer superior opportunities for the site to be preserved and interpreted.

NPS partnerships with organizations and private property owners of the associated sites would provide enhanced opportunities for interpretation and coordinated site management. Development and cooperative management of interpretive programs and comprehensive visitor services with the NPS would be beneficial.

The NPS finds that there is a need for NPS management in partnership with others to fully protect resources and to enhance visitor appreciation of the nationally significant resources and important stories associated with the Honouliuli Internment Camp. The incorporation of Honouliuli Internment Camp into the national park system would offer a visitor experience that allows the broadest understanding of the resources and stories relating to the internment of Japanese Americans and European Americans in Hawai‘i during World War II.

Alternatives

The following section describes a range of management alternatives that are being considered by the National Park Service as part of the special resource study.

OVERVIEW OF THE ALTERNATIVES

The study team developed two alternatives for the draft study/environmental assessment (EA), based on information gathered from public and stakeholder input, internal NPS discussions, evaluation of special resource study criteria, historical research, and NPS management models. The two alternatives considered are a “No Action” alternative, which serves as a baseline for comparison, and an “action” alternative, which is also the preferred alternative.

- **Alternative A**: Continuation of Current Management (No Action)
- **Alternative B**: Honouliuli National Historic Site or Monument—A Unit of the National Park System

For each alternative there is a description of the overall concept and key elements of the alternative, including management approaches, resource protection, visitor services, and the role of organizations and public agencies. Maps of the alternatives are included in Chapter 6 to illustrate the proposed recommendation.

The Selected Alternative

NATIONAL HISTORIC SITE OR NATIONAL MONUMENT—A NEW UNIT OF THE NATIONAL PARK SYSTEM

The recommendations encompassed in the selected alternative are the same as those identified and analyzed in alternative B in the draft study report/EA, with the exception of modifications made as a result of information and comments derived from public review of the draft study report/EA, as follows:

- The proposed national historic site or monument boundary has been reduced at the request of the University of Hawai‘i. Discussions between the NPS and the University of Hawai‘i have identified approaches to public access that do not require inclusion of University of Hawai‘i lands in an NPS boundary at this time. The University of Hawai‘i is committed to working with the NPS on granting access to the site over university lands should a national park unit be established. Future road access could be added to the national historic site or monument boundary once a more permanent road alignment has been determined.
- Minor modifications have also been made to address concerns regarding universal access to the site, potential partnerships, and technical assistance opportunities.

The above modifications would not constitute a change in environmental impacts beyond what was analyzed in the environmental assessment.

ALTERNATIVE A: CONTINUATION OF CURRENT MANAGEMENT (NO ACTION ALTERNATIVE)

Concept

Sites, organizations, and programs significant to the internment history in Hawai‘i would continue to operate independently by existing landowners, agencies, or organizations without additional NPS management or assistance other than what is currently available through existing authorities and grant programs.

Management of Sites Related to Internment

Local organizations and institutions have been active in documentation, preservation, and interpretation efforts for Honouliuli Internment Camp. The Japanese Cultural Center of Hawai‘i (JCCH) has conducted extensive research and uncovered the location of Honouliuli Internment Camp and other related sites. The JCCH maintains the largest repository of archives and collection items related to Honouliuli and the internment history in Hawai‘i. University of Hawai‘i—West O‘ahu (UHWO) faculty and students have also played a significant role in researching the history of Honouliuli and conducting archeological

Photos (top to bottom): **1.** 2011 Day of Remembrance Pilgrimage to Honouliuli Internment Camp. Photo: Brian Niiya, Japanese Cultural Center of Hawai‘i. **2.** Existing conditions, remaining World War II-era structure, Honouliuli Internment Camp, 2010. Photo: Valentino Valdez.

surveys. In 2012, the Hawai‘i State legislature commissioned an advisory group, called the Honouliuli Park Site Advisory Committee, to support preservation of the Honouliuli site. The advisory group was directed to: 1) provide state support toward preservation of the Honouliuli site; 2) establish a mechanism to leverage county, state, federal, and private funding for an educational resource center at the site; and 3) memorialize the struggle for civil rights by Hawai‘i’s people.

Sites related to World War II internment in Hawai‘i would continue to be managed separately by their public and private landowners. With the exception of the Kilauea Military Camp at Hawai‘i Volcanoes National Park, there would be no NPS staffing or operational support at sites identified in the study other than technical assistance under existing authorities if requested. Organizations and programs devoted to commemorating and preserving Hawai‘i’s internment history would continue to operate independently without NPS management or assistance other than that available through existing authorities. Table 1: Existing Management of Sites Evaluated in the Study includes a summary of current management and visitor opportunities for each of the sites evaluated in the study.

Honouliuli Internment Camp

Under the no action alternative, Honouliuli Internment Camp would remain in private ownership and would continue to be inaccessible to the general public. Interest by the existing landowner, public agencies, educational institutions, nonprofit organizations, and individuals may result in additional opportunities to interpret the site.

Although the site would not be managed expressly to provide visitor opportunities, existing landowners may continue to allow the JCCH site tours and educational activities on occasion when permission is expressly granted

Archeological field school, University of Hawai‘i–West O‘ahu, 2010. Photo: Valentino Valdez.

by the landowner. UHWO would continue to conduct field schools at Honouliuli Internment Camp, as allowed by the current landowner.

Other Associated Sites

Sites identified as potentially eligible for national historic landmark (NHL) nomination or nomination to the National Register of Historic Places (NRHP) would continue to be owned by various public and private entities. These sites would continue to function for private and public uses, most of which are not related to World War II internment history. Interpretation and conservation of such sites would be uncoordinated and at the discretion of the current landowner. Partner organizations and agencies would take the lead in developing interpretation and education materials and visitor opportunities. Such opportunities would occur at locations such as the JCCH.

Resource Protection

The primary responsibility for preserving nationally significant and associated sites would fall to the current owners and managers of those sites. Resource protection would be voluntary and dependent upon property owners' initiative. Sites in federal ownership would be managed in compliance with the National Historic Preservation Act (U.S. Immigration Station, Kilauea Military Camp). Sites not in federal ownership and currently listed in the National Register of Historic Places, such as the Honolulu Police Department, Yokohama Specie Bank, Kaua'i County Courthouse, and Maui County Courthouse and Police Station, would have some opportunities for technical assistance and grants for preservation.

For sites not listed in the NRHP nor protected by local preservation ordinances, any efforts for preservation would be at the discretion of existing landowners. Resources could suffer from a loss of integrity due to changes in use or ownership in accordance with local planning and zoning ordinances over time. Existing owners may also lack funding to maintain or preserve sites.

Visitor Experience

Organizations that provide visitor opportunities to learn about the internment history could continue to provide such opportunities. The JCCH could continue to provide visitor opportunities at the annual pilgrimage to Honouliuli, if the property owner was willing. Hawai'i Volcanoes National Park could provide interpretation at Kilauea Military Camp in coordination with the U.S. Army. World War II Valor in the Pacific National Monument at Pearl Harbor would continue to interpret the internment experience in Hawai'i as one component of the larger Pacific War story that it is mandated to convey.

Most other associated sites identified as significant to internment in Hawai'i are not managed expressly to provide visitor opportunities to learn about or experience these sites.

Japanese American Confinement Sites (JACS) Grant Program

Honouliuli Internment Camp and other associated sites would continue to be eligible for grants through the Japanese American Confinement Sites (JACS) Grant Program. Public Law 109-441 (16 USC 461) established

Concrete slab foundation of the latrine and shower room located in the final reduced-size civilian compound at Honouliuli. Photo: Valentino Valdez.

the JACS Grant Program for the preservation and interpretation of U.S. confinement sites where Japanese Americans were incarcerated during World War II. The law authorized up to $38 million for the life of the grant program to identify, research, evaluate, interpret, protect, restore, repair, and acquire historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the nation's commitment to equal justice under the law.

Grants are awarded to organizations and entities working to preserve historic Japanese American confinement sites and their history, including private nonprofit organizations; educational institutions; state, local, and tribal governments; and other public entities. Grants are awarded through a competitive process and require a two-to-one federal to non-federal match ($2 federal to $1 non-federal match).Since its establishment in 2006, the JACS program has awarded more than $15 million in grants as of fiscal year 2014. To date, JCCH has received five grants totaling $375,700. Projects funded include a documentary film, educational tours, a youth program, traveling exhibits, and multimedia virtual tours. The University of Hawai‘i has received four grants to date, totaling $168,700. Projects funded include collection of oral histories, archival research, and archeological field schools. California-based CyArk received a grant of $39,020 to digitally document Honouliuli. Under the no action alternative, organizations would continue to obtain assistance from the JACS Grant Program.

Operations

Operation and maintenance of existing sites would be assumed to remain at existing levels. With the exception of Kilauea Military Camp at Hawai‘i Volcanoes National Park, there would be no NPS staffing or operational responsibilities at the other nationally significant or potential NHL or NRHP sites associated with internment in Hawai‘i.

Participant, Honouliuli Internment Camp Field Study, July 2010. Photo: Valentino Valdez.

Table 1: Existing Management of Sites Evaluated in the Study			
Site	*Site Type and Location*	*Ownership and Management*	*Current Visitor Opportunities or Interpretation*
Nationally Significant Sites			
Honouliuli Internment Camp	Primary, Oʻahu	Private	Currently not accessible to the general public. Site tours and use for educational purposes occur on occasion with landowner permission.
U.S. Immigration Station	Primary, Oʻahu	Public, Department of Homeland Security and Hawaiʻi State Department of Health	None. Currently not accessible to the general public.
Sites Listed or Potentially Eligible for Listing in the National Register of Historic Places			
Honolulu Police Department	Secondary, Oʻahu	Public, City and County of Honolulu	None
Kauaʻi County Courthouse	Secondary, Kauaʻi	Public, County of Kauaʻi	None
Kilauea Military Camp	Primary, Island of Hawaiʻi	Public, National Park Service	Active military recreation camp. Opportunities for interpretation exist.
Yokohama Specie Bank		Private	None
Lānaʻi City Jail and Courthouse	Secondary, Lānaʻi	Private	None
Potentially Significant Sites—Additional Research Needed			
Waiākea Prison Camp	Secondary, Island of Hawaiʻi	Private	None
Hilo Independent Japanese Language School	Secondary, Island of Hawaiʻi	Unknown	None
Līhuʻe Plantation Gymnasium	Secondary, Kauaʻi	Privately owned structure adjacent to Isenberg Park	None
Kalāheo Stockade	Primary, Kauaʻi	Private	None
Haʻikū Military Camp	Secondary, Maui	Private	None
Maui County Courthouse and Police Station	Secondary, Maui	Public, Maui County	None
Other Related Sites—No Integrity Remaining			
Sand Island Detention Camp	Primary, Oʻahu	Public, State of Hawaiʻi	None/Non-Extant
Wailua Jail	Primary, Kauaʻi	Public	None/Non-Extant
Waimea Jail	Primary, Kauaʻi	Public	None/Non-Extant
Kaunakakai Jail and Courthouse	Secondary, Molokaʻi	Public	None/Non-Extant
Maui County Jail	Primary, Maui	Public, Maui County	None/Non-Extant

"Primary" sites are those that housed at least 10 prisoners, generally for more than several weeks. "Secondary" sites are those that were used as prisons for fewer prisoners, usually for shorter periods of time. Also included in the "secondary" category are sites where no internees were imprisoned, but where activities related to the internment occurred, such as hearings. Note: The Honolulu Police Department was inadvertently omitted from the printed versions of this table in the newsletter and draft report.

ALTERNATIVE B (SELECTED ALTERNATIVE): HONOULIULI NATIONAL HISTORIC SITE OR NATIONAL MONUMENT—A NEW UNIT OF THE NATIONAL PARK SYSTEM

Concept

Congress would establish Honouliuli National Historic Site as a new unit of the national park system. Alternatively, a national monument managed by the National Park Service could be established. The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that would allow for access and visitor facilities. In collaboration with partners, the National Park Service would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai‘i during World War II. The national historic site or monument would be supported by operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor. The National Park Service could respond to requests to provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai‘i during World War II.

Proposed Area

The Honoululi National Historic Site or National Monument would total approximately 155 acres. The historic Honouliuli Internment Camp and the adjacent overlook parcel (totaling approximately 123 acres) would be acquired by the NPS through a donation by the Monsanto Company. Additional Monsanto-owned lands (31.5 acres) with related resources could be protected through conservation easements, land transfer, or other measures, at Monsanto's discretion. All private property rights would be respected.

The University of Hawai‘i has committed to providing NPS with public access to Honouliuli, initially through granting the NPS a right of entry over existing roads from the west. The University of Hawai‘i is currently undergoing planning efforts for its lands adjacent to Honouliuli. This process and subsequent planning by the NPS should a national park unit be established may identify a new road alignment for public access. Once a desired road alignment for public access has been determined, this road alignment could be included in the national historic site or national monument through a boundary adjustment. This would allow the National Park Service to expend funds on the development and maintenance of the access road.

Three parcels owned by the City and County of Honolulu Board of Water Supply (totaling 0.6 acres) would be inholdings within the proposed area and would remain under current ownership and management. The communications facilities, non-contributing features within the historic site, would not be included in the proposed boundary.

Management

The NPS would have direct management responsibility for the Honouliuli National Historic Site or National Monument including: 1) interpretation and education associated with the Honouliuli Internment Camp and its resources, including the development of interpretive media and programs; 2) preservation and resource management for the historic site; and 3) operational facilities and infrastructure such as roads, restrooms, and trails.

Resource Protection

NPS staff would protect and preserve resources related to Honouliuli Internment Camp. Management plans would guide appropriate historic preservation documentation and treatments. As described below, there are opportunities to partner with local institutions and organizations in the protection of resources.

Visitor Experience

Visitors would have the opportunity to learn about Honouliuli Internment Camp, World War II internment in Hawai‘i, martial law, civil liberties, and peace and reconciliation through a wide variety of interpretive and educational programs onsite and at offsite locations. Interpretation would be accessible and relevant to diverse audiences and multiple generations. Virtual visitor experiences would be explored so that people could learn about and experience Honouliuli and related sites without actually visiting the sites. Programs could be provided by NPS rangers, partners, and volunteers. Information could be presented in multiple languages.

Partnerships

Other entities, specifically the University of Hawai‘i—West O’ahu and the Japanese Cultural Center of Hawai‘i, have done significant work to document, preserve, and interpret the Honouliuli Internment Camp and the larger history of internment in Hawai‘i during World War II. The NPS would seek to maintain these partnerships for future management of the Honouliuli National Historic Site or Monument. In addition, the NPS would explore, develop, and maintain new partnerships for the preservation and interpretation of Honouliuli Internment Camp and related sites, features, and stories in Hawai‘i.

There are substantial opportunities for partnerships related to Honouliuli National Historic Site or Monument with public agencies, educational institutions, nonprofit entities, and individuals. Potential partnership projects could include the development of educational programs, development of facilities, resource stewardship activities such as preservation of historic features and vegetation clearing, and research projects. Partnerships could also include shared facilities for interpretation, curatorial storage, operations, and maintenance.

Technical Assistance

Internment sites in Hawai‘i other than Honouliuli Internment Camp would continue to be owned and managed by their respective public and private owners. Any recognition or technical assistance related to the associated sites would be voluntary on the part of the landowner. The associated sites illustrate the broad-reaching effects of internment on the six major islands in Hawai‘i and are valuable in accurately interpreting this history.

Upon request, the NPS could work cooperatively with associated site owners and managers to explore opportunities for interpretation and/or preservation of the associated sites. Where appropriate, the NPS could also conduct research and provide assistance to related sites that have yet to be identified.

Operations

Staffing

Honouliuli National Historic Site or Monument would be managed through World War II Valor in the Pacific National Monument at Pearl Harbor, given its close proximity and

Collapsed roof in extant World War II-era structure, Honouliuli Internment Camp, July 2010. Photo: Valentino Valdez.

related history. Some staff positions at World War II Valor in the Pacific National Monument would be shared. However, management of the site would require additional staff as funding became available. A management plan would identify priorities, management emphases, and required staffing for a 15 to 20 year timeframe.

Based on comparisons of staffing levels for existing national historic sites of similar scale and management models, the following types of staff would be recommended:

- Site manager
- Cultural resource specialist
- Interpretive specialist
- Interpretive ranger (2)
- Law enforcement ranger
- Maintenance (2)
- Exotic plant management technician

Positions could be permanent, temporary, or seasonal. In addition, partner organizations could provide staff or volunteers, with types and numbers dependent upon the functions provided.

Operational and Visitor Facilities

Comprehensive management planning would guide the development of facilities for Honouliuli National Historic Site or National Monument. Facilities would be needed to support public access, circulation, orientation, and learning about the history of internment in Hawai‘i. The 7-acre overlook site could serve as a visitor staging area with ample space to provide for parking, visitor drop-off, interpretive features, and restrooms. The site is located just outside of the historic camp and offers views to Pearl Harbor, downtown Honolulu, and Diamond Head. Within the gulch, visitor facilities would be minimal to preserve the site's historic integrity. Facilities might include trails, interpretive waysides, primitive roads, and vault toilets. Implementation planning would also explore opportunities for persons of all abilities to access and experience Honouliuli Internment Camp.

Currently there is no public access to Honouliuli Internment Camp. Rights of access would be required to provide public access to the 7-acre overlook parcel and the historic site. Existing roads would require considerable improvement to accommodate visitor access. As noted above, the University of Hawai‘i has indicated its commitment to working with the National Park Service with regard to providing public access on existing and future roads through its lands.

The Federal Highway Administration (FHA) estimated construction costs for public and administrative access using existing road alignments would range from $3 to 20 million. This dollar amount would also include parking and turnaround areas for buses. The higher end of the range would be incurred if additional reconstruction or realignment is necessary for road improvements. Costs would need to be reevaluated after a formal site survey and through completion of a comprehensive management plan.

Shuttle or bus service from either World War II Valor in the Pacific National Monument or UHWO was also evaluated by the FHA. Costs to operate a bus connection from World War II Valor in the Pacific National Monument three times per week were estimated at $25,000 to 30,000 annually. Costs to operate a bus or shuttle from University of Hawai‘i—West O‘ahu twice daily were estimated at $91,000 to 112,000 annually.

NPS management of a national historic site at Honouliuli Gulch would be funded through federal appropriations as part of the annual NPS budget and through potential partners and grants. The national historic site or monument could share administrative, visitor, and operational facilities with World War II Valor in the Pacific National Monument or partner entities. Non-federal entities would continue to be eligible for the grants through the Japanese American Confinement Sites Grant Program for preservation, interpretation, and documentation projects associated with Honouliuli Internment Camp.

Based on the size and scope of this site, and the types of services and assistance proposed, the annual cost of NPS operations for the national historic site could be expected to be $400,000 to $750,000. The estimated operational budget would primarily fund NPS staff, programs, projects, and outreach.

Specific costs would be reevaluated in subsequent, more detailed planning for the unit. Planning would consider facility and site design, detailed identification of resource protection needs, and changing visitor expectations. Actual costs to the NPS would vary depending on timing and implementation and contributions by partners and volunteers. It is assumed that the long-range financial needs of Honouliuli National Historic Site or Monument would not just rely upon federally appropriated funds. A variety of other public and private funding sources could be sought by the NPS to assist in implementation efforts. Other NPS units have successfully found partners to help with funding major projects, and some of the costs associated with actions in the alternatives may prove to be less expensive if donated materials, labor, and other support can be secured.

Environmental Assessment

BACKGROUND

Before taking an action, the National Environmental Policy Act (NEPA) requires federal agencies to identify a range of alternatives for that action and to analyze the potential environmental impacts of that action, including any potential adverse environmental effects that cannot be avoided if the proposed action is implemented. The NPS prepared an environmental assessment (EA) for the *Honouliuli Gulch and Associated Sites Special Resource Study* to identify and analyze the potential environmental and socioeconomic consequences of each of the alternatives considered in the study.

IMPACTS

Consequences are determined by comparing likely future conditions under each alternative with the existing baseline conditions as described in the "no action" alternative. The analysis includes consideration of the context, intensity, and duration of direct and indirect effects of all the alternatives.

The NPS based analysis and conclusions on a review of existing literature, information provided by experts within the NPS as well as outside organizations, analysis of case studies of existing programs in other locations, and the professional judgment of the team members. The findings of this study will inform a recommendation by the Secretary of the Interior to Congress. If Congress takes action, then new environmental analysis would be undertaken prior to implementation actions. This new analysis would propose specific actions whose specific impacts would be assessed prior to implementation.

The NPS evaluated the environmental consequences of each alternative on the following topics: land use, water resources, vegetation, prehistoric and historic archeological resources, historic structures / cultural landscapes, museum collections, visitor experience, and socioeconomics.

The NPS finds that there would be no significant impacts associated with the proposed alternatives.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The NPS is required to identify an "environmentally preferred alternative" in an EA. The environmentally preferable alternative is determined by applying the criteria suggested in the National Environmental Policy Act (NEPA) of 1969 and is further guided by the Council on Environmental Quality (CEQ). The CEQ (46 FR 18026 - 46 FR 18038) provides direction that the "environmentally preferable alternative is the alternative that would promote the national environmental policy as expressed in NEPA's Section 101," including:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;

5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and

6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NEPA Section 101(b)).

Generally, these criteria mean the environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038).

Alternative B would protect nationally significant resources, including opportunities for protecting the Honouliuli site in perpetuity should the Monsanto Company donate it to the NPS, meeting criterion 1 above. Alternative B would also best meet the intent embodied in criteria 2, 3, and 4, through providing opportunities for protection of the historic Honouliuli Internment Camp with more opportunities for visitors to learn about the history and experience of Japanese American and European American incarceration during World War II. All alternatives would likely meet the principles identified in criteria 5 and 6. Although there are no specific actions related to these currently in the alternatives associated with these criteria, long-standing NPS policies and actions would apply. Based on this analysis, alternative B best meets the six criteria and is therefore the environmentally preferable alternative.

The analysis and findings contained in this study do not guarantee the future funding, support, or any subsequent action by the NPS, the Department of the Interior, or Congress. Identification of an environmentally preferred alternative should not be viewed as a positive or negative recommendation by the NPS for any future management strategy or action.

INTRODUCTION

1

2011 Day of Remembrance Pilgrimage to Honouliuli Internment Camp. Photo: Brian Niiya, Japanese Cultural Center of Hawai'i.

CHAPTER 1: INTRODUCTION

This section provides an overview of the purpose and scope of the study and describes the study process.

Purpose and Need

The Department of the Interior, Environment, and Related Agencies Appropriations Act of 2010, Title 1, Section 125 (123 Stat. 2932), October 30, 2009) (See Appendix A) authorized the National Park Service (NPS) to "conduct a special resource study of the national significance, suitability, and feasibility of including the Honouliuli Gulch and associated sites within the State of Hawai'i in the National Park System." The legislation stated, "The study shall evaluate the Honouliuli Gulch, associated sites located on O'ahu, and other islands located in the State of Hawai'i with respect to—

1. the significance of the site as a component of World War II;
2. the significance of the site as the site related to the forcible internment of Japanese Americans, European Americans, and other individuals; and
3. historic resources at the site."

This legislation was introduced in the Senate by Senator Daniel Inouye and Senator Daniel Akaka of Hawai'i, and in the House by Representative Mazie Hirono and former Representative and current Hawai'i Governor, Neil Abercrombie, with numerous cosponsors from across the United States and the Pacific territories (American Samoa, Guam, and the Northern Mariana Islands).

This study provides information to aid the National Park Service in determining whether the study areas meet eligibility, suitability, and feasibility criteria for designation as units of the national park system. The study follows the process established by the National Park System New Area Studies Act (P.L. 105-391, 16 U.S.C. Sec. 1a-5) and addresses the criteria for new areas outlined in NPS *Management Policies 2006* (See Appendix B).

The study evaluates 17 sites associated with the history of internment in Hawai'i. In this study, the NPS ascertained the public's level of interest in nationally recognizing this part of United States history and evaluated whether one or more of the sites would be appropriate for designation as a national park system unit. The NPS identified alternative strategies to manage and protect the resources, and to provide or enhance public understanding, use and enjoyment of the sites. Cost estimates for operations, acquisition and development are also included.

The National Park System New Area Studies Act requires that these studies be prepared in compliance with the National Environmental Policy Act (NEPA). Special resource studies that consider a national park unit as an alternative are required to complete an environmental impact statement (EIS). The NPS determined that an environmental assessment (EA) is a sufficient level of environmental analysis for this study. No significant impacts are anticipated from the findings and recommendations of this study.

Study Sites

A preliminary list of 13 sites was developed based on information obtained through personal interviews, declassified documents from the Federal Bureau of Investigation and Department of Justice, military files, newspapers, photographs, and numerous books and essays. The University of Hawai'i, Japanese Cultural Center of Hawai'i, and Trans-Sierran Archaeological Research provided information about internment sites in Hawai'i. Site visits by the study team were conducted where possible to determine current conditions and integrity of the sites. Four additional sites were recorded during the preparation of this report.

The Honouliuli Internment Camp is the best documented of the known sites. Trans-Sierran Archaeological Research in cooperation with the Japanese Cultural Center of Hawai'i provided site documentation in *Jigoku-Dani: An Archaeological Reconnaissance of the Honouliuli Internment Camp of O'ahu, Hawai'i*. A National Register nomination was also prepared for Honouliuli Internment Camp by Trans-Sierran Archaeological Research for submittal to the National Park Service and Keeper of the National Register of Historic Places. The nomination assesses the property's significance, age and integrity using criteria for National

Descendants of former internees at Honouliuli in 2011. Liane Sumida (left), Mari Aipa (second from left), and Sarah Sumida (right) are the granddaughters and great-granddaughter of Sam Masao Nishimura, who was incarcerated at Honouliuli. Photo: Jeffery Burton.

Register designation. Honouliuli Internment Camp was listed in the National Register of Historic Places in February 21, 2012 (Burton and Farrell 2011a).

Chapters 2 and 3 provide information on the study sites and an analysis of their significance.

Study Process

LEGISLATIVE AND POLICY DIRECTION

Several laws and policies outline the criteria for units of the national park system. The National Park System New Area Studies Act (P.L. 105-391, 16 U.S.C. Sec. 1a-5) establishes the basic process for NPS studies of potential new national park areas. NPS management policies provide further guidance.

According to NPS *Management Policies 2006*, a proposed addition to the national park system will receive a favorable recommendation from the NPS only if it meets all of the following four criteria for inclusion:

1. It possesses nationally significant natural or cultural resources;
2. It is a suitable addition to the system;
3. It is a feasible addition to the system;
4. It requires direct NPS management, instead of alternative protection by other public agencies or the private sector.

These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation's natural and cultural resources. The NPS also recognizes that there are other management alternatives for preserving the nation's outstanding resources.

NPS management alternatives are developed for sites that meet all four of the criteria for inclusion listed above. Further definition of each of these criteria is provided in the related sections of this study.

PUBLIC INVOLVEMENT

The NPS launched public scoping for this study in February 2011. A notice of scoping was published in the *Federal Register* on May 2, 2011 (Vol.76, No. 83, 24514–15). The study team produced and distributed an informational newsletter and press releases to the media, individuals, organizations, and government officials. Public information was made available on the National Park Service's Planning, Environment and Public Comment (PEPC) website and project website at www.nps.gov/pwro/honouliuli.

In February and March 2011, the study team held eight public scoping meetings on the six main islands in Hawai'i. Over 100 people attended the public meetings. Local, state, and federal government officials and stakeholders were also consulted. During this time, numerous articles and opinion pieces about the study appeared in area newspapers.

The comment period for public scoping extended to June 1, 2011, thirty days after publication of the notice of scoping in the *Federal Register*. See Chapter 8 for a full description of public involvement, consultation, and coordination conducted for the study.

DEVELOPMENT OF ALTERNATIVES

The NPS study team considered alternatives based on information gathered from the public and stakeholders, internal NPS discussions, site research, and management models within the national park system. The alternatives were narrowed down to two feasible alternatives contained in this study report. These alternatives are based upon the suitability and feasibility analysis of all 17 sites and include those sites that meet the criteria for national park system additions cited above.

The first alternative is the "No Action" alternative. It would continue existing management of the internment sites and serves as a baseline for comparison to the action alternative. The action alternative includes designation of Honouliuli Internment Camp as a unit of the national park system. The action alternative explores federal recognition of significant resources and opportunities for technical assistance and cooperative management with the NPS.

See Chapter 6 for a full description of the alternatives.

THE SELECTED ALTERNATIVE

The National Park Service special resource study process requires that the study identify the alternative or combination of alternatives that in the professional judgment of the NPS Director is most effective and efficient in protecting significant resources and providing for visitor enjoyment. Based on public and stakeholder input and professional judgment, the NPS selected alternative B, the action alternative, which would provide for the establishment of a national historic site or national monument. The National Park Service has determined this to be the most effective and efficient alternative in protecting significant resources and providing for visitor enjoyment.

REPORT PUBLICATION, REVIEW, AND TRANSMITTAL OF FINAL RECOMMENDATIONS

Chapter 8: Consultation and Coordination describes the public involvement and agency consultation that took place during the special resource study process. The public comment period for the *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment* was open from May 8 to July 15, 2014. Comments received have been incorporated into this final study report. A Finding of No Significant Impact (Appendix E) and errata to the draft study report (Appendix F) were completed by the NPS study team, which will transmit them with the report to the Secretary of the Interior. The Secretary will submit the final special resource study to Congress, along with the Secretary's recommendations for the area.

Photos (top to bottom): **1.** The NPS study team on site at Honouliuli. **2.** Following the now-overgrown path that once led to the guard towers, Honouliuli Internment Camp. Photos: NPS, 2013.

RELATED STUDIES

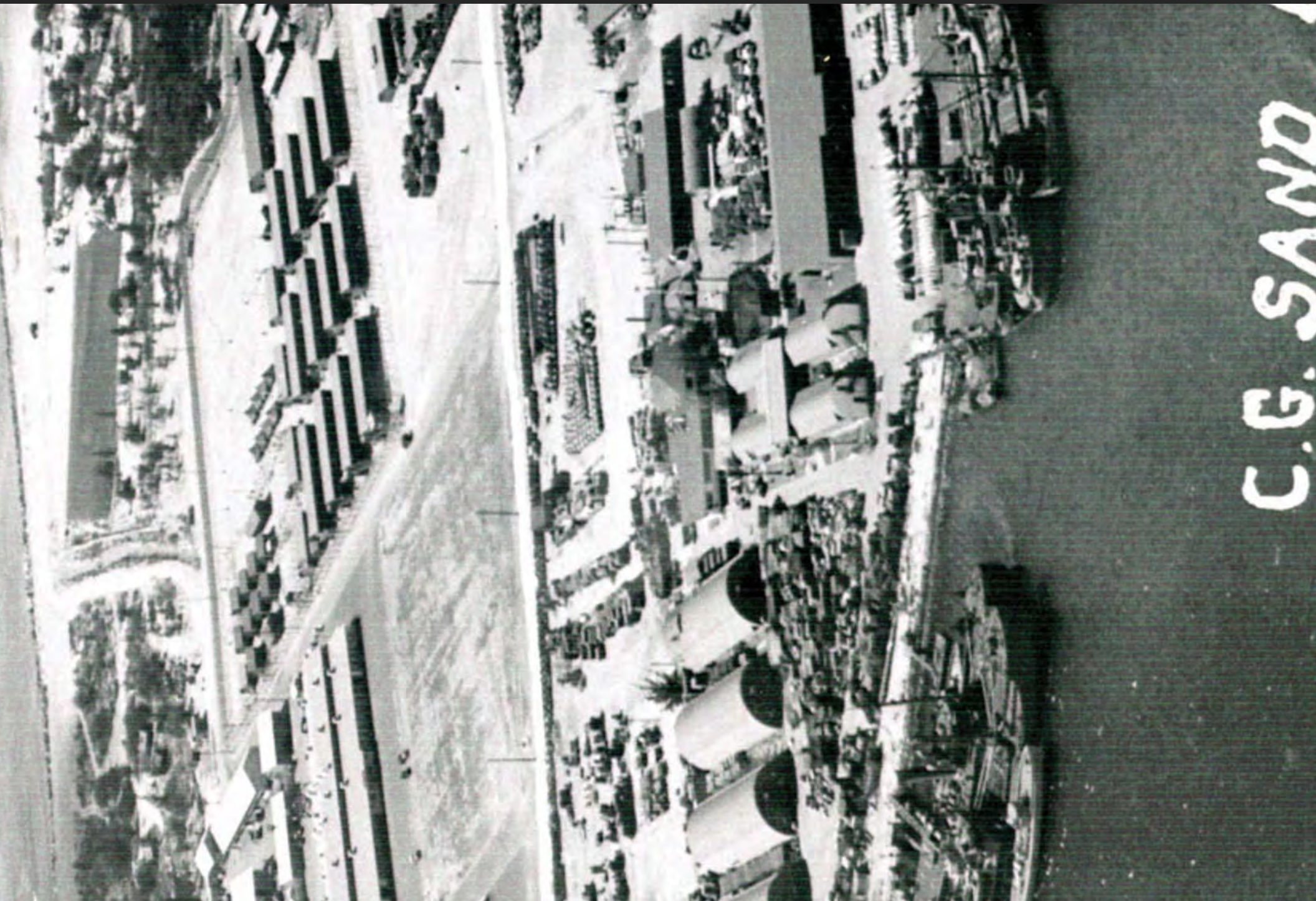
Other efforts have recently been completed which provided guidance and resource information for the study.

Japanese Americans in World War II: A National Historic Landmark Theme Study (2012)

This study was authorized by Public Law 102-248 to identify key sites related to the incarceration of Japanese Americans during World War II. It was completed by the NPS in 2012. The study outlines the historic context of the period from 1941–46 and identifies sites potentially eligible for designation as national historic landmarks.

World War II Japanese American Internment Sites in Hawai‘i (2007)

This study was completed in 2007 by Jeffrey F. Burton and Mary M. Farrell (Trans-Sierran Archaeological Research) for the Japanese Cultural Center of Hawai‘i. It documents the locations and conditions of eight sites associated with the internment of Japanese civilians in Hawai‘i during World War II. The study provides recommendations for future research, interpretation, and management of these sites.


C.G. SAND

Aerial view of Coast Guard Station and Internment Camp at Sand Island. The Coast Guard Station is in the foreground. Compound #3 is in the background, with tents and barracks surrounded by barbed wire fence. Japanese and Japanese Americans were interned there until 1943. Photo: courtesy of the Japanese Cultural Center of Hawai'i, U.S. Coast Guard Collection.

CHAPTER 2: HISTORICAL OVERVIEW AND RESOURCES

This chapter describes the history and sites associated with the internment experience in Hawai'i. Part I describes the context and significant events in the history of the internment in Hawai'i. Part II describes the primary places associated with the internment in Hawai'i.

Part I: Historical Overview

The historical context provides the background necessary for identifying resources associated with the internment experience in Hawai'i, and for assessing the significance of these resources as described in Chapter 3 of this study (Resource Significance).

The information in this chapter is largely derived from *World War II Japanese American Internment Sites in Hawai'i* (Burton and Farrell 2007) and *Jigoku-Dani: An Archaeological Reconnaissance of the Honouliuli Internment Camp, O'ahu, Hawai'i*, prepared for the Japanese Cultural Center of Hawai'i by Trans-Sierran Archaeological Research principals Jeff Burton and Mary Farrell (Burton and Farrell 2011). Other information came from the National Register of Historic Places (Burton and Farrell 2008), and the *Japanese Americans in World War II National Historic Landmark Theme Study* (NPS 2012). A more detailed narrative can be found in those documents.

IMMIGRATION AND PRE-WAR HAWAI'I (1852–1941)

Looking for cheap, dependable labor, plantation owners encouraged immigration to Hawai'i as early as 1852, with the importation of laborers from China to work on sugar plantations (Daws 1968, 179). Immigrants from Portugal, Norway, Sweden, and Germany were welcomed as laborers and potential citizens (ibid., 211–12).

Large-scale Japanese immigration to Hawai'i began in 1868 when approximately 150 Japanese citizens were recruited for work on sugar plantations. Between 1885 and 1894, nearly 30,000 Japanese contract laborers came to the islands, most staying on after their original contracts expired. Japanese immigrant businessmen and professionals followed. To circumvent an anticipated ban on future recruitment, plantations brought in more than 26,000 Japanese after Hawai'i was annexed by the United States in 1899, and before it was designated a territory in 1900 (Commission on Wartime Relocation and Internment of Civilians [CWRIC] 1982, 262–63). With the passage of

Japanese store, Honolulu, c. 1895–1910. Photo: Library of Congress.

Japanese emigrants on sisal plantation, Hawai‘i, c. 1910–15. Photo: Library of Congress.

the Immigration Act of 1924, immigration from Japan (and other countries and territories in the Asia Pacific) was terminated. The ban remained with few alterations until the Immigration and Nationality Act of 1965.

On the international front, relations between the Japan and the U.S. were increasingly tense in the lead up to Pearl Harbor. Japan's seizure of Manchuria in 1931, its alignment with Germany and Italy in 1936, and its undeclared war with China beginning in 1937 were statements of its expansionist intentions. In Europe, the U.S. allied with Britain against the Axis nations and readied itself for possible war in the Pacific.

In Hawai‘i, partly because of their large numbers, Japanese Americans and Japanese nationals had opportunities beyond the plantation fields as professionals, entrepreneurs, and skilled workers (Odo 2004, 24). By 1940, race relations on Hawai‘i were far better than on the mainland, with Japanese immigrants integrated into the economy and represented in government, education, medicine, and law (CWRIC 1982, 263). However, they were not immune from racism or discrimination. As on the mainland, those born in Japan were prohibited from becoming naturalized citizens on the basis of race (Niiya 2001, 331).

Japanese in Hawai‘i were also seen as potentially dangerous if the United States and Japan were to go to war. Tetsuden Kashima, a scholar of Japanese American imprisonment during World War II, found evidence that both the Army and the Federal Bureau of Investigation (FBI) gathered data on Nikkei (Japanese and Japanese American) residents in the late 1930s through World War II. The Army recommended the arrest of 128 Nikkei individuals, the closing of 60 amateur radio stations, and the confiscation of 23 businesses under a regime of imposed martial law (Kotani quoted in Kashima 2003, 68). From 1939 to the beginning of World War II, the FBI designated 338 Issei (immigrants born in Japan) and nine Nisei (American-born children of Issei) in Hawai‘i as candidates for custodial detention (Kashima 2003, 68).

A separate effort to document aliens of Japanese and European heritage in Hawai‘i began in August of 1940 under provisions of the federal Alien Registration Act (Allen 1950, 430). Aliens in the islands were fingerprinted and registered.

By the start of World War II, the Nikkei, as Japanese immigrants and their descendants are called, numbered almost 160,000, comprising the largest single ethnic group and nearly 40 percent of the total population of Hawai‘i (Kashima 2003, 67).

THE START OF WORLD WAR II AND MARTIAL LAW IN THE TERRITORY OF HAWAI‘I (1941–44)

The bombing of Pearl Harbor on December 7, 1941 resulted in the deaths of more than 2,340 military personnel and more than 60 civilians (Grant 2010, 4). Shortly after noon on December 7, Lieutenant General Walter

C. Short of the Army visited the Governor of Hawai‘i, Joseph Poindexter, and requested that the governor declare martial law. Both General Short and Governor Poindexter issued proclamations declaring martial law, both of which had been prepared months in advance (Allen 1950, 37–38; Anthony 1975, 5–6). Under martial law, Hawai‘i was governed by Army generals Walter Short, Delos Emmons, and Robert C. Richardson, Jr.

Poindexter's proclamation on December 7, 1941 placed the territory of Hawai‘i under martial law, suspended the writ of *habeas corpus* (the requirement for a person under arrest to be brought before a judge or into court), and placed the judicial branch of the government in the hands of the military (Allen 1950, 38). The military closed the civilian courts and established its own courts with authority over civilians (Kashima 2003, 69). The military enforced ordinary civil and criminal law dealing with everything from disorderly conduct to murder, and military control in Hawai‘i restricted nearly every aspect of daily life.

The General Orders promulgated under martial law covered not just military functions like curfew and blackout rules, but also aspects of daily life and recreation. This included regulation of traffic, firearms, gasoline, food and liquor, radios, the press, telephone use, wages and employment, the possession of currency, the collection of garbage, rent control, restaurants and bars, bowling alleys, and the chlorination of water.

Pearl Harbor Naval Base and the U.S.S. *Shaw* ablaze following the Japanese attack, December 7, 1941. Photo: Library of Congress.

The Army-controlled military courts considered cases ranging from the most serious criminal cases to dog-leash violations. The military conducted some 50,000 trials of civilians throughout the islands during the war, with a 99 percent conviction rate in the 22,000 cases on the island of O‘ahu in 1942 and 1943. The average trial lasted five minutes, and legal counsel was seldom at hand once it became common knowledge that the presence of a defense lawyer would ensure a harsh sentence (Scheiber and Scheiber 2003). Initially intended to last for only several months, martial law was maintained for nearly three years until October 1944 (Grant 2010, 5).

INTERNMENT IN HAWAI‘I (1941–45)

Martial law was the legal authority for the incarceration of hundreds of individuals on suspicion of disloyalty to the United States. In the months following the Pearl Harbor attack, President Roosevelt and Secretary of the Navy William Franklin Knox pressured the appointed military governor, General Delos C. Emmons, to imprison all residents of Japanese ancestry in Hawai‘i, confine them to one island, or remove them to the mainland (Kashima 2003, 75). However, mass incarceration of all Japanese and Americans of Japanese ancestry in Hawai‘i was not a possibility with more than 35,000 resident aliens and 124,000 American citizens forming nearly half of Hawai'i's population. General Emmons took a measured approach to mass incarceration, believing that it was not necessary, feasible, or useful in Hawai‘i and could potentially do more harm than good (Kashima 2003, 72–78).

The round-up and imprisonment of aliens and civilians began on December 7th while the bombing of Pearl Harbor was still in progress, even before martial law had been declared. The War Department ordered the internment of all individuals who had been identified on the custodial detention list (Kashima 2003, 69). These included leaders in the Japanese community who had significant community influence, were educated, were teachers, or had access to transportation or communications. They included members of the Japanese

consulate, and community members who served in an unofficial consular capacity for those wanting to communicate officially with Japan on legal issues of births, deaths, marriage, and other business. They also included Shinto and Buddhist priests, Japanese language teachers, those with radios, and farmers and fishermen with access to boats and other transport. Martial arts instructors, travel agents, those with access to the press, and Kibei (American citizens of Japanese ancestry who had been educated in Japan) were also targeted. In some cases, those arrested were considered "guilty by association" or were identified by informants, some without just cause.

Beginning on December 8, others not on the custodial detention list were also arrested. By December 9, the FBI and military had arrested 345 Japanese nationals, 22 U.S. citizens of Japanese ancestry, 74 German nationals, 11 Italian nationals, 19 U.S. citizens of German ancestry, and 2 U.S. citizens of Italian ancestry (ibid, 72).

On Oʻahu, the FBI and the Army carried out the arrests together. The FBI handed the prisoners over to the military police at the U.S. Immigration Station at Honolulu, which was then used as a temporary detention station. Some individuals were taken to the downtown Honolulu Police Department Headquarters or the Military Police Headquarters (formerly the Yokohama Specie Bank) before being transferred to the Immigration Station. On the other Hawaiian Islands, the FBI, the army's military intelligence personnel, and local police collaborated to make the arrests (Kashima 2003, 69–71).

On Hawaiʻi Island, internees were held temporarily at Kilauea Military Camp, Waiākea Prison Camp near the Hilo Airport, and the Hilo Independent Japanese Language School. On Kauaʻi, the Wailua County Jail, Waimea Jail, and Kalāheo Stockade were used as temporary detention centers, and one internee was held in the shower room at the Līhuʻe Plantation gymnasium (Saiki 1982, 62). On Lānaʻi, those arrested were held at the Lānaʻi City Jail. On Molokaʻi, an old jail at Kaunakakai was used for temporary detention. Detainees from Maui, Molokaʻi, and Lānaʻi were later taken to the Maui County Jail and a detention center at Haʻikū, also on Maui.

At the temporary detention centers, the fate of detainees varied: some were questioned and released; some were sent to the U.S. Immigration Station in Honolulu for further interrogation; and some were held for as long as six months before being sent to an internment camp (Kashima 2003, 74). Those arrested were to have two hearings, one with a military intelligence board, and the other with a review board consisting of three civilians and two army officers (ibid, 73–74).

After the hearings, those who were not released were sent from the U.S. Immigration Station across Honolulu Harbor to the Sand Island Detention Station. The facility was set up on December 8, 1941, and operated until March 1, 1943. Most of the internees sent to Sand Island were later transferred to mainland camps.

Ten ships departed Hawaiʻi transferring internees and their family members to the mainland between February 17, 1942 and December 2, 1943. The first several ships removed internees from Sand Island and transferred them to Department of Justice internment camps at Bismarck, North Dakota; Lordsburg, New Mexico, Santa Fe, New Mexico; and Crystal City, Texas (Kashima 86). In 1942, family members of interned men were given the option to join them on the mainland. Many family members chose this voluntary incarceration because they didn't have any financial support without their head of household. The War Department also selectively removed Japanese American citizens and sent them to the mainland. These family members and selectively removed Japanese Americans were sent to centers run by the War Relocation Authority where mainland Japanese Americans were confined for the duration of the war (Kashima 86). Locations where they were sent included Jerome, Arkansas; Topaz, Utah; and Tule Lake, California.

Beginning March 2, 1943, internees remaining at Sand Island were transferred to the Honouliuli Internment Camp also on the island of Oʻahu, which had been constructed to house both internees and prisoners of war. Historical records suggest Honouliuli Internment Camp was built to allow expansion of the Honolulu Embarkation Port facilities on Sand Island (U.S. Army 1945, 10), and because the camp's location on Sand Island was subject to direct attack or landings by enemy forces, it was in violation of international law (Springer 1943).

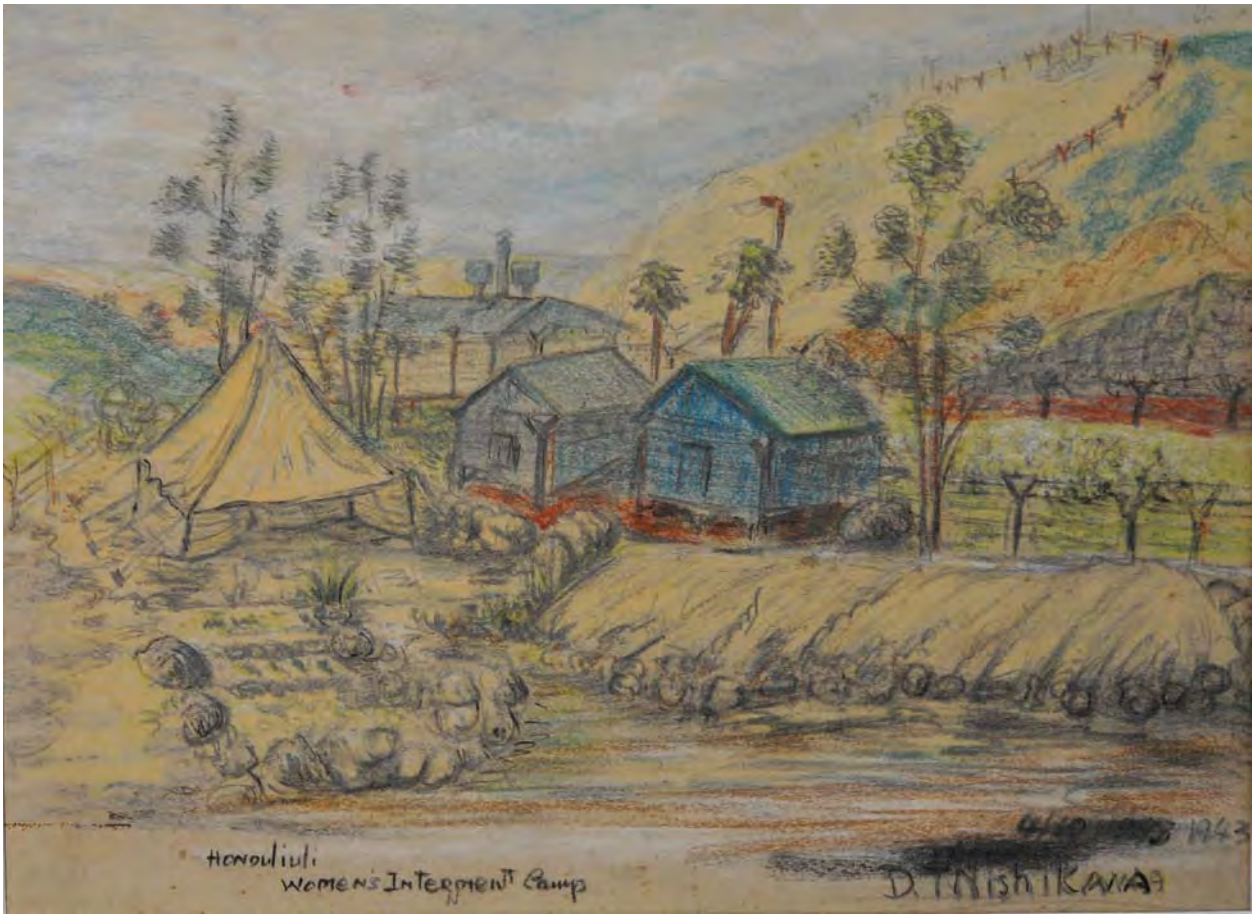
Honouliuli was markedly different from the other detention facilities in Hawaiʻi. While

the other locations were ad-hoc places to keep internees temporarily, Honouliuli was sited and constructed for the express purpose of confining internees and prisoners of war during World War II. Honouliuli illustrates the government's clear thinking on policy implementation; it was a place that the government could build where, when, and what it needed.

Honouliuli Internment Camp held approximately 400 internees. Of these, three hundred sixty-four were Nikkei, including six women (JCCH, pers. comm. 2014 and Soga 2007, Appendix 4). Most of the Nikkei interned were American citizens of Japanese ancestry who had been educated in Japan, some of whom held dual citizenship (JCCH, pers. comm. 2014). In addition, 33 of the 36 remaining internees—described as being of "German" or "Italian" heritage—were American citizens, including seven women (Rosenfeld 2014).

Some of the Honouliuli internees were later transferred to mainland Department of Justice internment camps or War Relocation Authority centers. Other Honouliuli internees were eligible for parole; however, if an internee wished to leave the camp and was eligible to do so, that person was required to sign a statement promising they would not contest the imprisonment in court. Failure to sign would result in continued imprisonment.

It is difficult to confirm the precise numbers of internees from Hawai'i because civilians were arrested, transferred, and released throughout the war. For example, although no Irish are listed in the known compilations, Suzanne Falgout of the University of Hawai'i—West O'ahu has found records indicating a woman from Ireland was interned at Honouliuli because her anti-British attitude was considered potentially pro-Nazi. A useful table (adapted for this report as Table 2-1) shows the number of internees of Japanese ethnicity confined on each island at different time periods, but the author Gary Okihiro makes clear that the totals were fluid, reflecting transfers, new arrests, and releases. Further research will likely refine the estimates of the number of people interned.



Drawing of the women's internee compound at Honouliuli by Dan T. Nishikawa, April 10, 1943. Image courtesy of the Japanese Cultural Center of Hawai'i, Dan Toru Nishikawa Family Collection.

The best estimate for the number of people of Japanese ancestry incarcerated from Hawai‘i is approximately 2,456. This number included 875 predominantly Issei males arrested and transferred to Department of Justice internment camps on the mainland; 1,217 individuals of Japanese ancestry in Hawai‘i sent to War Relocation Authority camps on the mainland; and approximately 364 Nikkei imprisoned in Hawai‘i (Kashima 2003, 86).

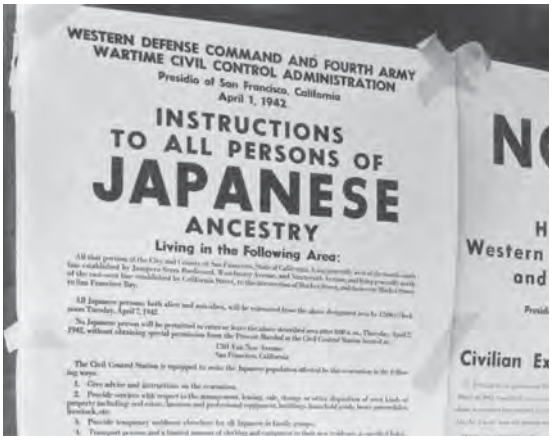
In addition, there were 139 Caucasion internees from Hawai‘i (Rosenfeld 2014). One hundred twenty-five of them were listed in an FBI memo at the end of March 1942, which cited 67 German aliens, 40 U.S. citizens of German ancestry, 15 Italian aliens, two U.S. citizens of Italian ancestry, and one Norwegian alien (Shivers 1942). New research indicates that some internees reported to be “German” and “Italian” were of other nationalities or cultural affiliations. In summary, individuals who were interned in Hawai’i included people of Filipino, Okinawan, Japanese, German, Italian, Danish, Finnish, Irish, Lithuanian, Korean, Norwegian, and Swedish descent, as well as European Jews who had escaped persecution by the Nazis (Rosenfeld 2014).

INCARCERATION OF NIKKEI ON THE MAINLAND (1941–45)

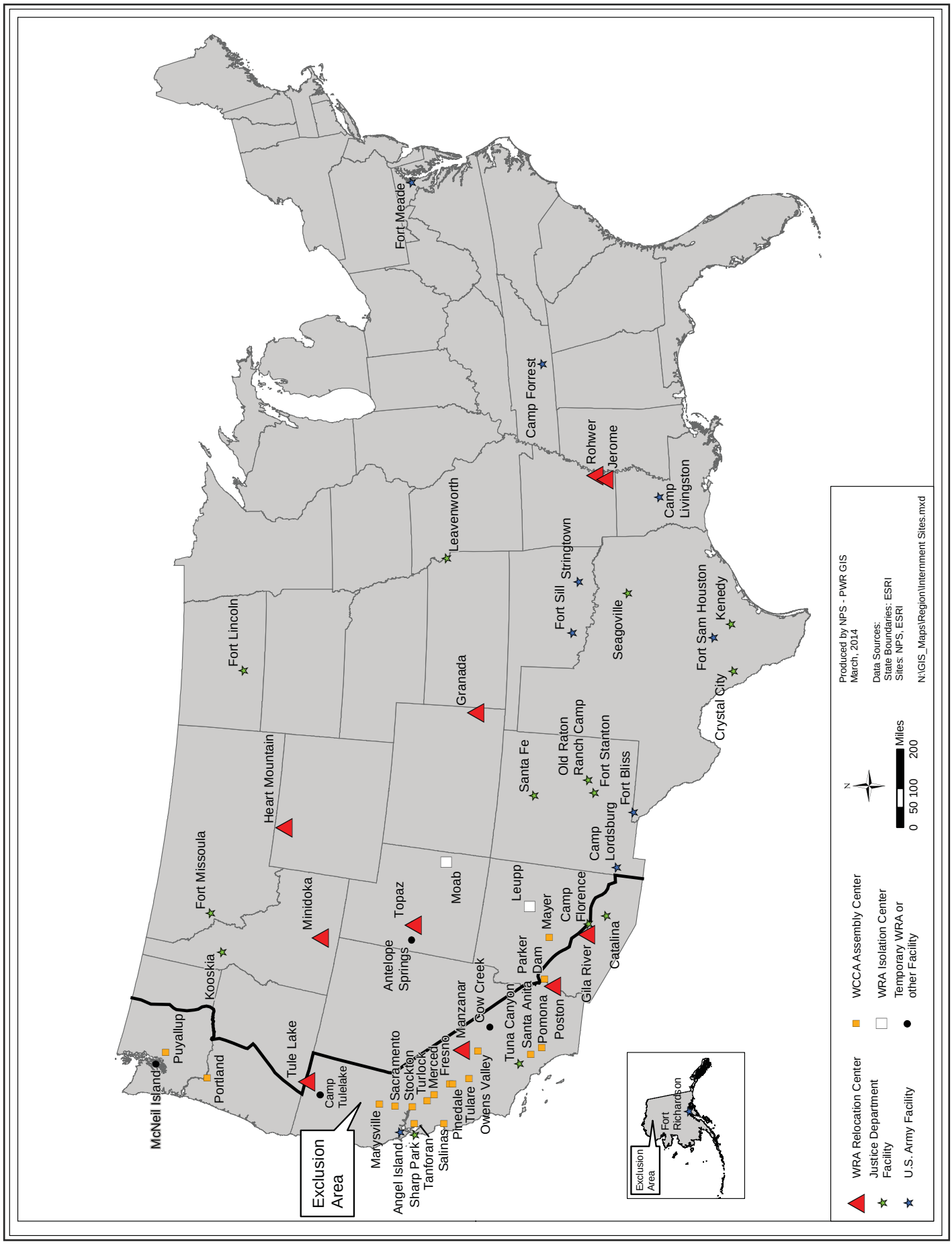
As in Hawai‘i, immediately after the attack on Pearl Harbor leaders in the Japanese American community on the West Coast were arrested, bank accounts were frozen, and short-wave radios, cameras, and other items deemed contraband were seized. Those arrested on the mainland and those from Hawai‘i who were brought to the mainland were initially interned in temporary detention centers run by the Department of Justice, such as Angel Island in San Francisco Bay. Internees were later sent to permanent internment centers, first under the Army at sites such as Lordsburg, New Mexico, and then back to Department of Justice centers such as Santa Fe, New Mexico. Much later—after June 11, 1943—many of the internees from the Santa Fe camp were able to reunite with their families at the Department of Justice Family Internment Camp in Crystal City, Texas.

Conditions for the incarceration of people of Japanese ethnicity were significantly different on the mainland. On the mainland, incarceration soon included the entire Japanese American population of the West Coast. The “relocation,” as the mass incarceration was called, was authorized by Executive Order No. 9066, and signed by President Franklin D. Roosevelt on February 19, 1942. Although the Executive Order empowered the Army to designate areas from which “any or all persons may be excluded” the Army enforced its provisions almost completely against individuals of Japanese ancestry, of whom two thirds were American born citizens (NPS 2005, 2). Those incarcerated included people from all walks of life: native-born citizens, the elderly, World War I veterans given citizenship by an act of Congress, Japanese Alaskans, children, and even babies of half-Japanese ancestry living in Caucasian foster homes and orphanages.

By June 2, 1942, all Nikkei on the West Coast, except for a few left behind in hospitals, were in temporary detention camps, called “assembly centers,” located at fairgrounds and racetracks near major metropolitan areas along the West



Photos (left to right): **1.** Civilian Exclusion Order demanding the removal of all persons of Japanese ancestry, San Francisco, April 1942. **2.** In response to Civilian Exclusion Order No. 20, San Francisco residents of Japanese ancestry wait to register with the Civil Control Station. Photos by Dorothea Lange, courtesy Bancroft Library, University of California, Berkeley.



Mainland sites associated with the incarceration of persons of Japanese descent during World War II.

Photos (clockwise from top left): **1.** Families board a bus in Centerville, CA that will take them to a temporary detention camp known as an "assembly center." Photo by Dorothea Lange, May 1942. **2.** A grandfather and grandchildren await transportation, Hayward, CA. Photo by Dorothea Lange, May 1942. **3.** Families arrive at the WRA center at Heart Mountain, WY, September 1943. Photo by Bud Aoyama. **4.** Arrivals at the Salinas Assembly Center, California, March 1942. Photo by Clem Albers. All photos:courtesy Bancroft Library, University of California, Berkeley.

Coast. From the temporary detention facilities they were moved to ten inland centers run by the War Relocation Authority (WRA).

Four U.S. Supreme Court cases challenged the mass incarceration of American citizens and aliens of Japanese ancestry during World War II. In three cases, the United States Supreme Court upheld the convictions of Fred Korematsu, Gordon Hirabayashi and Minoru Yasui, testing the constitutionality of the curfew imposed on Japanese Americans and the government's right to exclude people of Japanese ancestry from the West Coast based on "military necessity."

But in the fourth case, decided by the Supreme Court on December 18, 1944, the justices ruled unanimously that Mitsuye Endo should be released unconditionally, that is without having to follow the indefinite leave procedure established by the WRA. The court stated that the WRA "has no authority to subject citizens who are concededly loyal to its leave procedure." While sidestepping the constitutional question of the right of the government to hold citizens without cause in wartime, it did in effect free all loyal Japanese Americans still held in the WRA centers.

Anticipating the Supreme Court decision, on December 17, 1944, the War Department announced the lifting of the West Coast exclusion orders, and the WRA simultaneously announced that the centers would be closed within one year.

END OF THE WAR AND RELEASE (1944–1960s)

In Hawai'i, martial law had been the legal authority for incarcerating U.S. citizens as well as resident aliens. When martial law was lifted in Hawai'i on October 24, 1944, there was no longer a legal authority to hold citizens. However, six days before martial law ended, President Roosevelt signed Executive Order 9489, modeled after Executive Order 9066. This executive order authorized Hawai'i's military commander not only to intern enemy aliens, but also to expel from the islands any U.S. citizen who was considered a security threat. Citizens could be arrested and detained, pending their exclusion from the territory of Hawai'i (Okihiro 1992, 268–69).

Under the authority of Executive Order 9489, on November 11, 1944, the 67 remaining Japanese American citizens held at Honouliuli were transferred to the Tule Lake Segregation Center in California (Ogawa and Fox 1991, 135). During 1945, an additional 12 American citizens of Japanese ancestry were arrested and detained pending exclusion. In fact, Ogawa and Fox report that citizens remained prisoners even after the last Issei were released: 18 alien internees were released from the Honouliuli Internment Camp on September 14, 1945, leaving only three citizens in custody (ibid, 138). The civilian prison compound at Honouliuli was closed in 1945 (Kashima 2003, 86) but the camp may have been used into 1946 for the transfer of prisoners of war or other military activities.

The mass exodus of Nikkei from the WRA centers occurred during the spring, summer, and fall of 1945. The last War Relocation Authority center, Tule Lake, closed on March 19, 1946. The last Justice Department internment camp, Crystal City, closed on February 27, 1948.

REDRESS (1960s–1980s)

During the 1960s, a group of Japanese Americans, inspired by the Civil Rights movement, began an effort to bring awareness and justice to what had occurred to their parents and grandparents during World War II. This effort is known as the "redress movement." Initially, their efforts led to a proclamation by President Gerald R. Ford in 1976, stating that the incarceration had been wrong and was a national mistake, never to be repeated.

On July 31, 1980, President Jimmy Carter signed Public Law 96-317, establishing the Commission on Wartime Relocation and Internment of Civilians (CWRIC) and initiating the investigation of these wartime events. The Commission held hearings nationwide with over 750 witnesses, the majority of whom were Nikkei who experienced incarceration. On February 22, 1983 the Commission made public its report, Personal Justice Denied. Their conclusion after 18 months of research was that "the promulgation of Executive Order 9066 was not justified by military necessity, and the decisions which followed from it-detention, ending detention, and ending exclusion-were not driven by analysis of military conditions. The broad historical causes which shaped these decisions were race prejudice, war hysteria, and a failure of political leadership." (CWRIC1997: 194).

Evidence discovered following the war from FBI and Office of Naval Intelligence reports led to retrials in the early 1980s overturning convictions of Fred Korematsu, Gordon Hirabayashi, and Minoru Yasui on charges related to their refusal to submit to curfews and incarceration based on race. The courts found that the government had intentionally withheld reports and other critical evidence at trials all the way up to the Supreme Court, which would have proved that there was no military necessity for the exclusion, and thus, for the incarceration of Japanese Americans.

On August 10, 1988, President Ronald Reagan signed the Civil Liberties Act of 1988, which wrote into law the U.S. CWRIC's recommendations. When President George H. W. Bush signed the appropriation bill on November 21, 1989, payments were set to begin on October 9, 1990. The oldest survivors received their redress checks of $20,000 first, along with a letter of apology signed by President Bush. The Civil Liberties Act also established a fund for educational programs, called the Civil Liberties Public Education Fund.

COMMEMORATION (1980s–PRESENT)

Since 1988 four sites have been set aside by the federal government to provide opportunities for public education and interpretation of the incarceration of Japanese Americans during World War II. All four sites are on the mainland: Manzanar National Historic Site, California, designated in 1992; Minidoka Internment National Monument, Idaho, designated in 2001 and renamed Minidoka National Historic Site in 2008; Bainbridge Island Japanese American Memorial called Nidoto Nai Yoni (Let it not happen again) Memorial, Bainbridge Island, Washington, 2008; and the Tule Lake Unit of World War II Valor in the Pacific National Monument, California, designated in 2008. In 2007, Congress authorized a $38 million grant program for the preservation and interpretation of related historic sites called the Japanese American Confinement Sites Grant Program. Through this grant program, the NPS has awarded $9.5 million to nonprofit organizations; educational institutions, state, local, and tribal governments; and other public entities throughout the United States.

Table 2-1: Number of Persons of Japanese Ethnicity Confined in Internment Camps in Hawai'i during World War II (adapted from Okihiro 1992, 267)

Date	*Internment Sites**						
	O'ahu†	*Kaua'i*	*Maui*	*Moloka'i*	*Lāna'i*	*Hawai'i*	*Total*
1942							
Jan.	190	41	51	4	2	85	*373*
Feb.	292	53	56	4	3	110	518
Sept.	319	9	9			6	343
1943							
June	238						238
Aug.	229	1	4				234
Dec.	169		1				170
1944							
Jan.	324						324
June	184	2				2	188
Oct.	117						117
1945							
Sept.	25						25

* Internment Sites: O'ahu—Honolulu Immigration Station, Sand Island Detention Camp, Honouliuli Internment Camp; Kaua'i—Wailua County Jail, Waimea undetermined location, Kalāheo Stockade; Maui—Maui County Jail, Ha'ikū Camp; Moloka'i and Lāna'i—county jails; Hawai'i—Kilauea Military Camp, Waiākea Prison Camp.

† O'ahu counts include those transferred from other islands.

Table 2-2: Sites Associated with the Internment in Hawai‘i during World War II		
Site	***Primary*** *(Used for at least 10 prisoners)*	***Secondary*** *(Used for fewer than 10 prisioners)*
O‘ahu		
Honolulu Military Police Station (Yokohama Specie Bank)		√
Honolulu Police Department		√
Honouliuli Internment Camp	√	
Sand Island Detention Camp	√	
U.S. Immigration Station	√	
Island of Hawai‘i		
Kilauea Military Camp (KMC) Detention Camp and Prisoner of War Camp	√	
Hilo Independent Japanese Language School		√
Waiākea Prison Camp		√
Kaua‘i		
Kalāheo Stockade	√	
Kaua‘i County Courthouse—Līhu‘e		√
Līhu‘e Plantation Gymnasium		√
Wailua County Jail	√	
Waimea Jail	√	
Maui		
Maui County Jail	√	
Ha‘ikū Military Camp		√
Moloka‘i		
Kaunakakai Jail and Courthouse		√
Lāna‘i		
Lāna‘i City Jail and Courthouse		√
The data in this table is based on best reliable sources and may be updated as more research is acquired.		

Part II: Sites Associated with the Internment in Hawai‘i

Geographic Scope

Based on the legislation passed by Congress authorizing this study, its geographical scope is focused broadly on sites in the state of Hawai‘i that are associated with the internment of American citizens and aliens of Japanese and European heritage during World War II.

IDENTIFICATION OF RESOURCES

Research on sites associated with the incarceration was formally undertaken for this study in December 2010, and all other contributing research was completed separately outside the scope of this study. The identification of resources resulted primarily from the work of Trans-Sierran Archaeological Resources, the staff and volunteers of the Japanese Cultural Center of Hawai‘i, the University of Hawai‘i, and interested individuals. Studies include interviews, oral histories, and document reviews conducted during the past several decades, research at the National Archives, and additional archival and archeological field research by the University of Hawai‘i faculty and students.

Thirteen sites related to the internment in Hawai‘i were originally identified in December 2010 based on work completed by Trans-Sierran Archaeological Resources for the Japanese Cultural Center of Hawai‘i. Over the course of one year, the list of sites rose from 13 to 17. The four additional sites identified include the downtown Honolulu Police Station, the Yokohama Specie Bank (across the street from the Police Station) (Mori, pers. comm. 2011), the Hilo Independent Japanese Language School where individuals were detained pending transfer to O‘ahu (Nunes-Atabaki and Nunes 1999, 41), and the Kaua‘i County Courthouse, where Kaua‘i internee hearings were held. Given the breadth of the geographic area and complexity of the history, it is likely that additional sites associated with the internment will emerge over time.

Sites or locations associated with the internment in Hawai‘i correspond to Table 2-2. “Primary” sites are those that housed at least 10 prisoners, generally for more than several weeks. “Secondary” sites are those that were used as prisons for fewer prisoners, usually for shorter periods of time. Also included in the “secondary” category are sites where no internees were imprisoned, but where activities related to the internment occurred, such as hearings. Each of these properties may include buildings such as houses, courthouses, jails, and/or sites such as detention locations and military camps.

Historic resources associated with internment in Hawai‘i include eight primary sites where at least ten internees were confined, and eight secondary sites, where fewer internees were confined. The secondary sites also include the Kaua‘i County Courthouse in Līhu‘e, where internee hearings were held. In most cases, because of the immediacy of the roundup and arrests, existing facilities, including jails, schools, immigration stations, and military installations were used to confine the internees.

O‘AHU INTERNMENT SITES

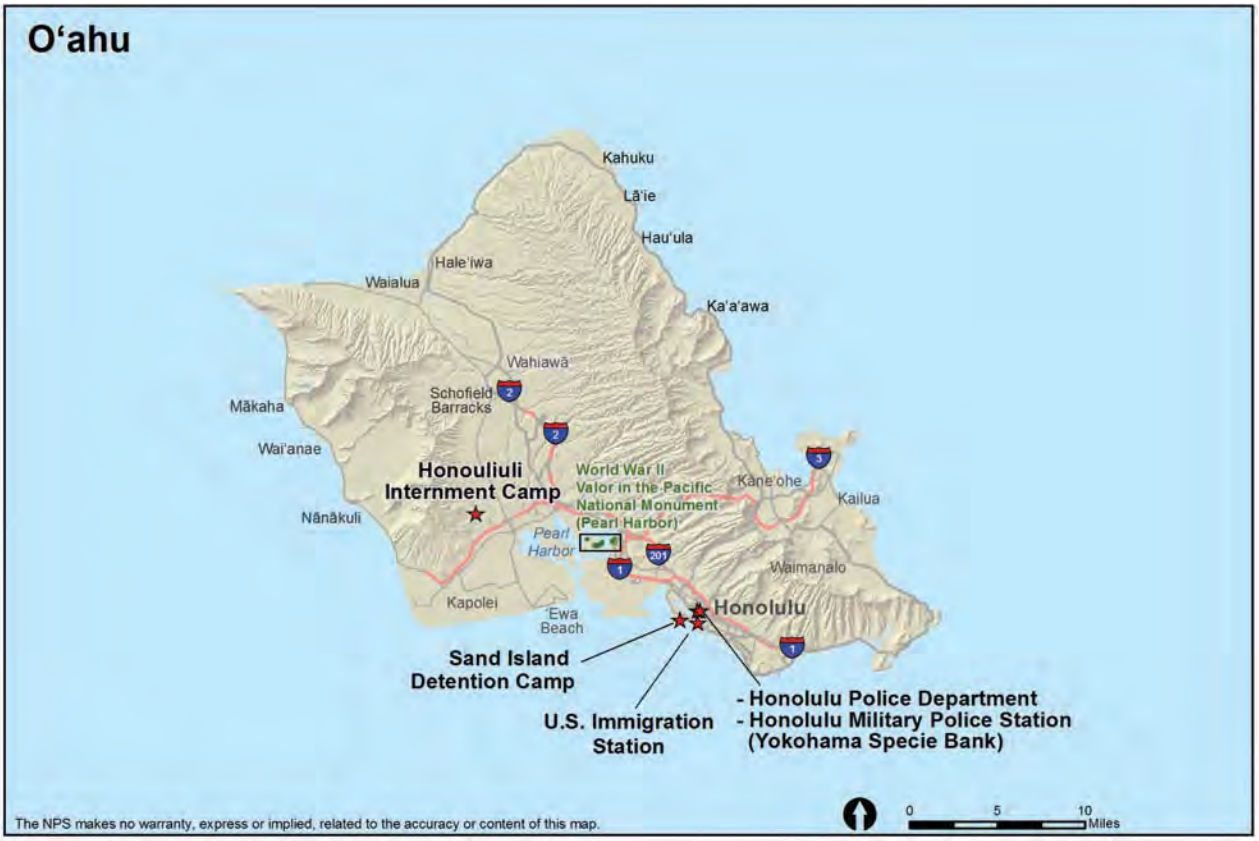
Five sites were used on the island of O‘ahu: the Honolulu Police Department Headquarters, the Honolulu Military Police Station, the U.S. Immigration Station, Sand Island Detention Camp, and Honouliuli Internment Camp.

Honolulu Police Department Headquarters and Yokohama Specie Bank / U.S. Army Police Station, Downtown Honolulu

The downtown Honolulu Police Department Headquarters at 842 Bethel Street was a location where some individuals were taken on December 7, 1941, before being transferred to the U.S. Immigration Station on Ala Moana Boulevard (Mori 2011). During the war, it became the location of the Alien Property Custodian office, which confiscated property owned by foreign citizens. Across the street, at 36 Merchant Street, was the Yokohama Specie Bank, which was originally a bank for Japanese nationals living in Hawai‘i. After the attack on Pearl Harbor, the building was seized by the Army and used as the military police station. It housed a jail in the basement where it is reported that Hawaiian residents of Japanese ancestry were kept prior to transfer to the U.S. Immigration Station.

Physical Remains

The Honolulu Police Department and the Yokohama Specie structures have been preserved and the exteriors have been restored. Both structures are part of the Merchant Street Historic District, listed in the National Register of Historic Places in 1973.



Map of internment sites on the island of O'ahu.

U.S. Immigration Station

The U.S. Immigration Station, located at 595 Ala Moana Boulevard in Honolulu, was the place individuals from O'ahu were taken on December 7th and in the days following when they were arrested by the Army and the FBI. The FBI's custodial detention index of December 4, 1941, listed 149 people on O'ahu to be arrested in the event of war (Kashima 2003, 69–71). By day's end on December 7, more than 200 people had been taken to the U.S. Immigration Station. By December 10, that number rose to 400, of which 75 percent were Nikkei (ibid, 43).

Internees from all of the Hawaiian Islands who were sent to Honouliuli, Sand Island, and permanent mainland internment and incarceration centers also passed through the U.S. Immigration Station. Italian and German aliens and U.S. citizens of Italian and German ancestry were also held at the U.S. Immigration Station. A fountain in the southern part of the courtyard was reportedly made by Alfredo Guisti, an Italian prisoner of war from Pietrasanta, Italy.

Unlike most of the other internment sites in Hawai'i that only served local, short term needs, the U.S. Immigration Station had a broad, statewide role over an extended period. It served as a temporary internment location, but also as a center of legal administration.

Physical Remains

The U.S. Immigration Station building is currently used for offices of the Department of Homeland Security and the Hawai'i State Department of Health. The four buildings and associated grounds of the three-acre complex were listed in the National Register of Historic Places on August 14, 1973. The areas of significance include "architecture," "social/humanitarian," and "Pacific Bridge." The date of construction is 1934. The building was designed by Charles W. Dickey, the first person raised in Hawai'i to have formal training as an architect.

All of the buildings at the site were present during World War II: the administration building; a two-story detention building now used by the Hawai'i State Department of Health; a long, one-story annex; and the garage/waiting shed. Several of the structures were likely used, as the U.S. Immigration Station reportedly could hold up to 400 prisoners.

Photos (clockwise from top left): **1.** Honolulu Police Department, c. 1973. Photographer unknown, provided as part of National Register nomination form. **2.** Honolulu Police Department at Bethel and Merchant Streets, 2007. Photo: James Rosenthal, Library of Congress. **3.** Yokohama Specie Bank (Honolulu Military Police Station), 2007. Photo: James Rosenthal, Library of Congress.

Photos (clockwise from top left): **1.** U.S. Immigration Station, c. 1973, photographer unknown, provided as part of National Register nomination form. **2.** Fountain reported sculpted by Alfredo Guisti, an Italian prisoner of war, U.S. Immigration Station, 2006. Photo: Burton and Farrell 2007. **3.** Gate at Sand Island Internment Camp. Photographer unknown, c. 1942, U.S. Army Museum of Hawai'i. 4. Detainees at Sand Island Internment Camp lived in tents for six months until barracks were constructed. Photographer unknown, c. 1942, U.S. Army Museum of Hawai'i.

Japanese immigrants and American citizens of Japanese ancestry stayed in the courtyard and in holding cells in back of the main building; the holding cells are still present at the northwest end of the building. Although some minor adaptations have been made to the interior of the structures to accommodate current uses, the complex appears to retain a high degree of integrity.

Sand Island Detention Camp

The Sand Island Detention Camp, located on Sand Island in Honolulu Harbor, was opened on December 8, 1941 and operated for 15 months until March 1, 1943. It was an internment camp run by the U.S. Army. The location was chosen because it was near Honolulu and because the buildings of the former Territorial Quarantine Hospital were available for use. Early maps show the quarantine area as an irregular ellipse within Sand Island; this same configuration is on WW II-era maps. The island location provided a measure of geographic isolation and security from Honolulu. The bridge that now connects Honolulu to Sand Island was constructed after World War II.

A week after the outbreak of war, approximately three hundred internees had been transferred from the Immigration Station to the Sand Island Detention Camp. The first Japanese prisoner of war, Ensign Kazuo Sakamaki, was also held at Sand Island, in a separate enclosure. Captured on the windward side of O'ahu near Bellows Field before dawn on December 8, Sakamaki had been skipper of one of five two-man midget submarines assigned to breach Pearl Harbor's defenses, and he was the only one of the ten to survive the suicide mission. Sakamaki was kept at Sand Island eight weeks before being transferred to a prisoner of war facility at Camp McCoy in Wisconsin (Straus 2003, 8–14).

Kumaji Furuya, one of the civilian internees taken to Sand Island on December 9, 1941, remembered being marched through a thicket of kiawe trees to a large Spanish-style building and then to a tiled building with showers, latrines, and a kitchen. He and his fellow prisoners were given tents and cots to set up for their quarters (Saiki 1982, 29–31).

At one point there were four separately fenced enclosures for internees within the original quarantine hospital station, two for male Nikkei with 250 persons each, one for 40 females "of mixed races," and one for 25 male German and Italian nationals and U.S. citizens of German and Italian ancestry. Each fenced area had its own mess hall, showers, and latrines. Between the compounds were pathways for workers and guards. Twenty-five detainees were assigned to each barracks. They reported twice daily to be counted (U.S. Army 1945).

The first commanding officer of Sand Island was Captain Carl F. Eifler followed by Lt. Louis F. Springer. Approximately $500,000 was spent to improve and maintain the facilities during the 18 months the camp was used. The improvements included the construction of eight guard towers and four two-story barracks. The guard towers were prefabricated and erected in two weeks: each was 20 feet tall with welded legs and platforms crafted from halfinch thick metal plates (Ching, interview 2004).

Yasutaro Soga, a journalist and leader interned at Sand Island, remembers that there was a dining room and shower/toilet room, both of concrete, and that tents were used for the internees for the first six months (Soga 2007, 29–65). He recalls that four 30-foot by 60-foot two-story barracks were built in May 1942. These undoubtedly correspond to the four barracks listed as part of the Sand Island improvements. Oral history, historic maps and photographs, and a 1962 aerial photograph indicate that the civilian internee compound was located near the center of the island.

In a report to the Swedish Consul during the first year of the war, J. R. Sulzer described the facilities he saw at Sand Island on September 9, 1942:

> The camp consists of several wooden barracks of excellent construction, well ventilated, well lighted and having shuttered windows. Large spaces are left between the beds and in several of the barracks the beds are tiered . . . Electricity is installed in all of the barracks . . . Married couples are authorized to live in well-constructed tents, which are laid out on the grounds of the camp (Sulzer 1942).

Sulzer's tally of prisoners and civilian internees included those at Sand Island and at the U.S. Immigration Station in Honolulu. He lists 48 male and four female Japanese citizens, two German male citizens, two Italian male and one Italian female citizen, and 252 American male citizens and 15 females. Given the other

PORTRAITS OF INTERNEES BY GEORGE HOSHIDA

George Hoshida, from Hilo, Hawai'i, documented his incarceration experience in World War II through hundreds of drawings and watercolors. Hoshida was transferred from Kilauea Military Camp to Sand Island, then to Department of Justice camps at Lordsburg and Santa Fe, New Mexico, and WRA camps in Jerome, Arkansas and Gila River, Arizona. These portraits were drawn at Lordsburg and depict internees of Japanese descent from Hawai'i. Images: George Hoshida Collection, Japanese American National Museum. Gift of June Hoshida Honma, Sandra Hoshida, and Carole Hoshida Kanada.

Sawaichi Fujita, tinsmith, Hilo, Hawai'i; Keizo Takata, store owner, Hawi, Hawai'i

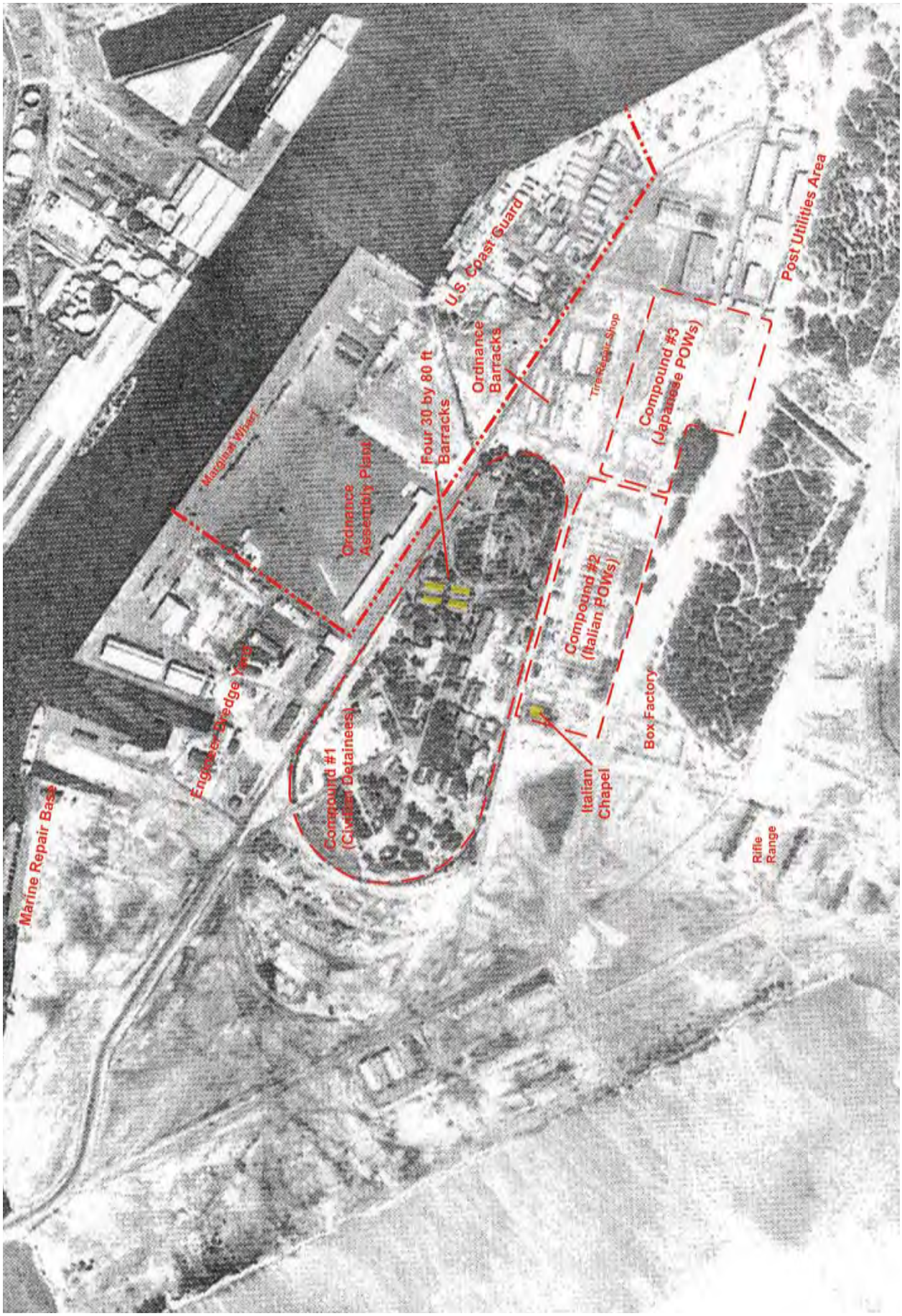
Kodo Fujitani, Reverend, Honolulu Moiliili Nishi Hongwanji, O'ahu; Ryuten Kashiwa, Reverend, Waialua Hongwanji, O'ahu

Kenichi Maehara, photographer, Hawai'i National Park; Kinzaemon Odachi, President of Tenrikyo, Hilo, Hawai'i

Gentaro Arita, farmer, Papaikou, Hawai'i; Shigeru Ando, farmer, Papaikou, Hawai'i

Chikai Odate, Higashi Hongwanji, Kaua'i; Ryuichi Murata, principal, Manoa Heiwa gakko, Honolulu

Segaku Takezono, monk, Wailuku Hongwanji, Maui



1962 aerial photograph of Sand Island indicating the location of areas of the former detention camp. Photo: Burton and Farrell 2007.

Photos (top to bottom): **1.** Sand Island, 2006: observation tower and beach defenses. **2.** Italian Chapel, Sand Island. Built by Italian prisoners of war, this historic chapel is the last of the WWII-era buildings to stand on Sand Island. Photos: Burton and Farrell 2007.

documented counts, the great majority of the 252 American male citizens were likely Japanese Americans, but German Americans were also present (Nye 2005).

Physical Remains

Today, no evidence of the internment camp, or of the Territorial Quarantine Hospital remains. Most of Sand Island has been developed with modern warehouses and Coast Guard facilities, and a wastewater treatment plant has been constructed in the western part of the island. There are only three areas that have not been paved over and built upon: the 14-acre Sand Island State Recreation Area along the southern edge of the island, parts of the Coast Guard Station in the northeastern part of the island, and a small area of vegetation at the Sand Island Treatment Center. The Treatment Center includes the only in situ standing building from the World War II era; it is a chapel built by Italian prisoners of war (POWs).

Honouliuli Internment Camp

Honouliuli is a longstanding place name, translated as "dark bay," that marks the areas between ʻEwa villages and Waipahu. Prior to the construction of the Honouliuli Internment Camp, Honouliuli Gulch was part of the James Campbell Estate and included an agricultural irrigation system dated to 1920. It was surrounded by sugar cane fields that produced an important agricultural export central to the economy of Hawaiʻi.

Honouliuli Internment Camp, which opened on March 2, 1943, was located in Honouliuli Gulch on the ʻEwa Plain, west of the city of Waipahu, on the western part of Oʻahu. First known as the Honouliuli Internment Camp, its name was later changed to Honouliuli Alien Internment Camp, and still later it became POW Compound Number 6 (U.S. Army 1945, 10). The term "Honouliuli Internment Camp" is most commonly used now to describe it, and that term is used in this study.

Built on 160 acres, Honouliuli Internment Camp had facilities for approximately 3,000 prisoners (Springer 1943). The Army cleared trees and grass in the densely vegetated valley to provide clear views from guard towers and thus enhance security (Gordon 2005). The camp was divided into seven compounds: one compound for administration and guards, one for civilian internees, and eventually five compounds for prisoners of war. The civilian compound was further divided into compounds for male civilian internees of Japanese ethnicity, female civilian internees of Japanese ethnicity, and civilian internees of European ancestry (Nye 2005). A 1943 report of the Office of Military Governor (Springer 1943) described the camp:

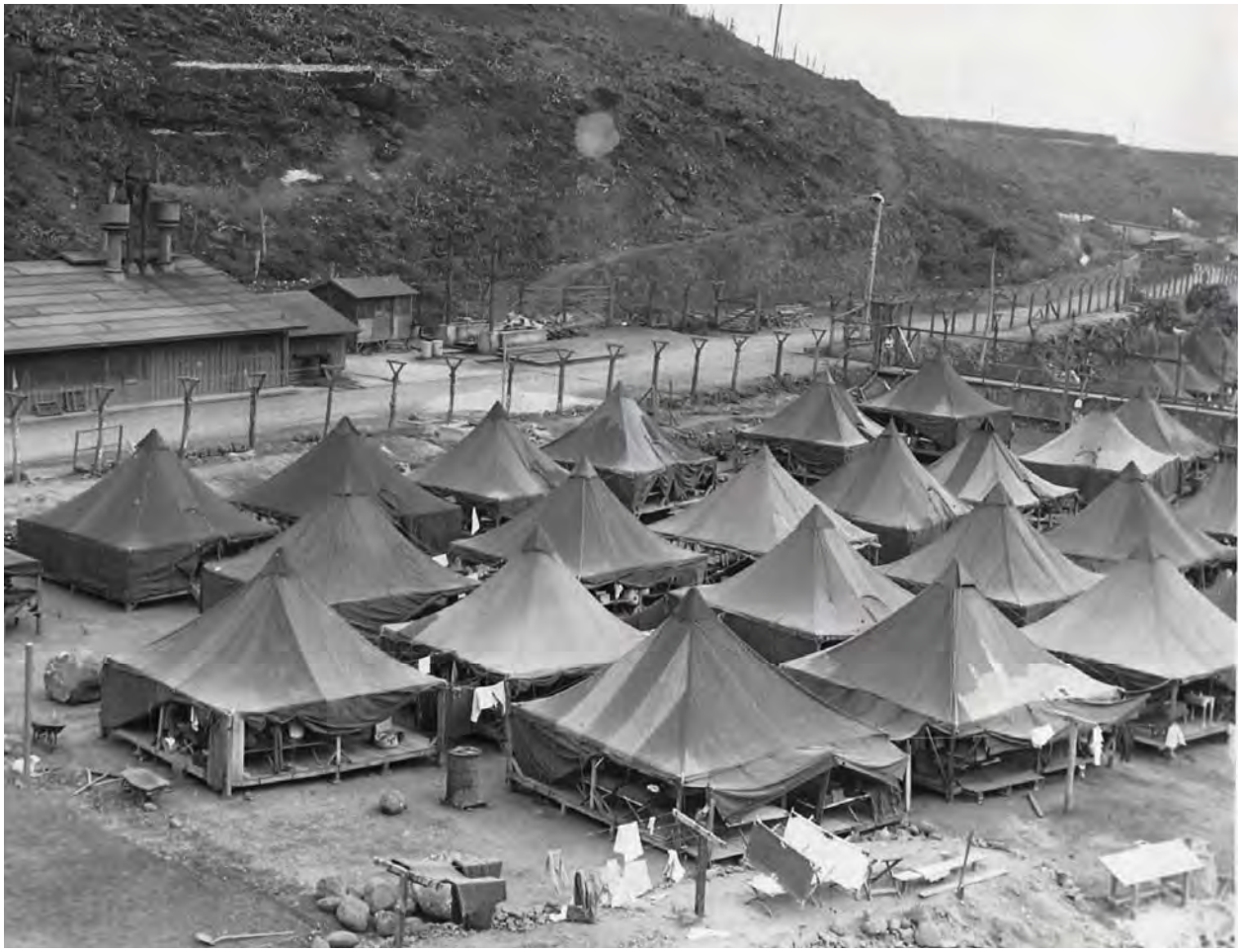
> The kitchen and mess hall for Japanese internees is equipped to feed up to one thousand internees. The internees live in prefabricated sixteenman demountable barracks. All latrines have modern plumbing with hot and cold showers. A post exchange is available for the purchase of cigarettes, tobacco, and miscellaneous items for sale. There is also a tailor shop, an equipped dental office, and a dispensary for necessary medical treatment. A recreation field has been cleared and fenced in for the use of the internees…
>
> The prisoner of war section of the Camp has been divided into separate enclosures to take care of Japanese officers, enlisted men, and noncombatant Japanese prisoners of

> war. As a result of the Gilbert Island operation and the capture of Korean noncombatant prisoners of war, it has been found necessary to construct an additional enclosure to separate the Japanese from the Koreans.
>
> There are two large prisoner of war kitchens and mess halls, each with facilities to feed one thousand or more prisoners. In the prisoner of war section there are cold water showers and pit latrines. Prisoners of war live in pyramidal tents, usually six to eight men in a tent.

Other historic records from the military and internees provide insights into different aspects of the Honouliuli Internment Camp. Historic records include Army memoranda and blueprints, oral histories, internee art, and reports by the Swedish Vice-Consul, who inspected the camp as the authorized representative of a neutral power. There are also several historic photographs showing a sea of tents, closely spaced barracks, fences, guard towers, and other structures taken by R. H. Lodge, a former division overseer of the O'ahu Sugar Company who became an official Army photographer.

Honouliuli was the largest prisoner of war camp in Hawai'i and held nearly 4,000 individuals during its operation. The POW population was composed of soldiers and labor conscripts from Korea, Okinawa, Taiwan, Japan, and Italy. Honouliuli also held women and 10 children who were Japanese civilians displaced from the Pacific, including Saipan and Rota, as well as four men from the Philippines (Adler 2014 and Falgout 2014).

Combined, the blueprint information and historic photographs indicate there were about 175 buildings (more than 60 of them in the administration area), 14 guard towers, and over 400 tents (including single pyramidal and double tents) at the camp. Discrepancies in the historic information suggest that the number and locations of buildings and tents changed



View of tents in Compound #4 for POWs at Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Photo: Hawai'i's Plantation Village.

through time, likely to meet changing needs as the camp population grew.

The closure of the Honouliuli detention facility has not been well documented. More research on the departure of internees and prisoners of war, closure of the facility, and later uses will benefit collective understanding of Honouliuli.

Physical Remains

Honouliuli Internment Camp was listed in the National Register of Historic Places on February 21, 2012. The areas of significance include "Asian and European ethnic heritage," "military and social history," politics, government, and law," and "archeology-historic/non-aboriginal."

The site of the Honouliuli Internment Camp is located roughly seven miles inland from the south and west coasts of O'ahu, north of the H-1 Freeway and west of Kunia Road. The 122.5-acre area identified in the National Register of Historic Places is wholly owned by Monsanto Hawai'i. The University of Hawai'i—West O'ahu owns the western bluff above Honouliuli Gulch.

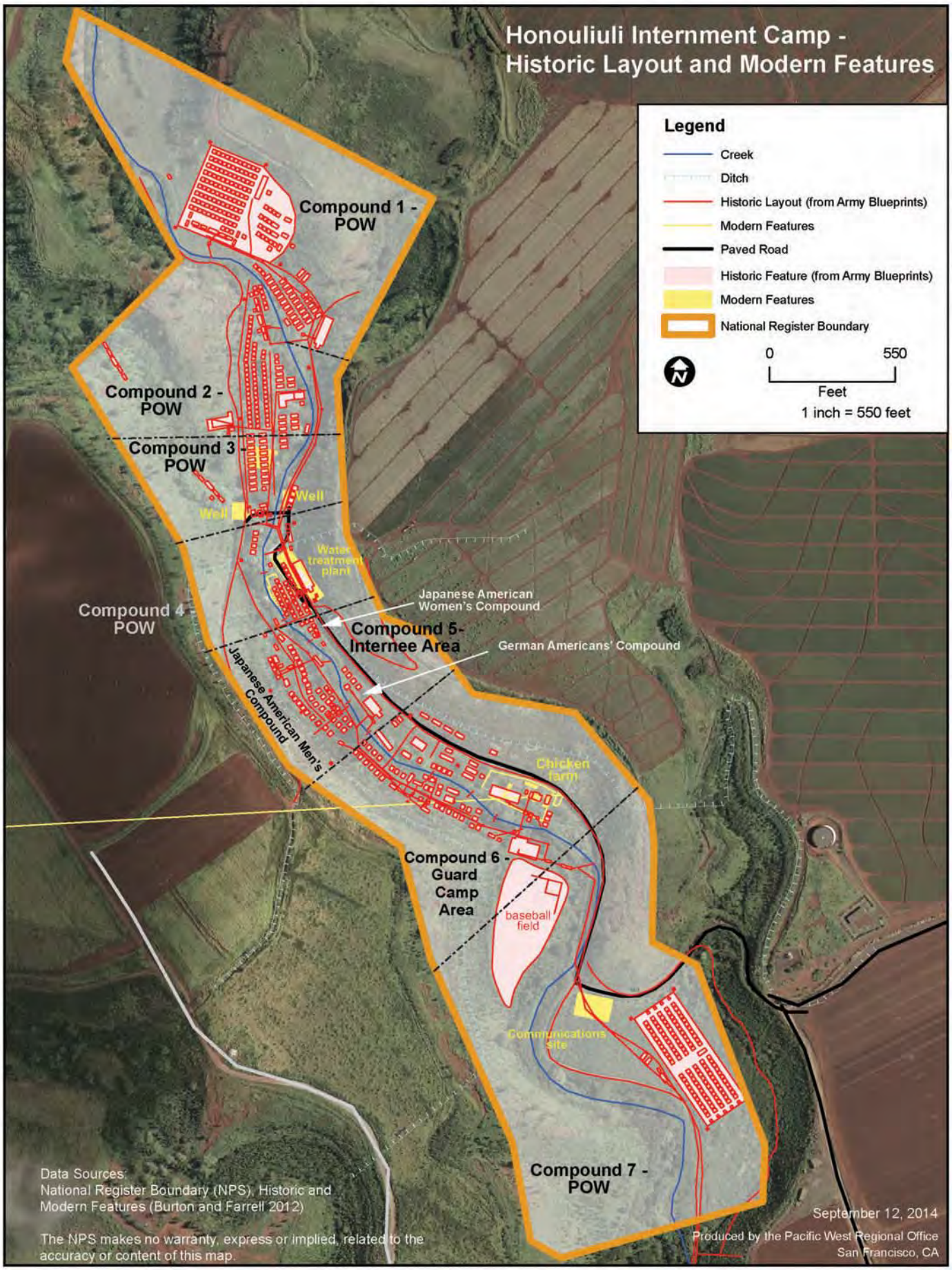
As it was during its occupation, the site is set in a hidden gulch surrounded by agricultural fields. The gulch is about 500 to 700 feet wide at the camp location, with steep slopes rising on both sides. In contrast to the plowed farm fields above, the gulch is currently overgrown with vegetation, most notably invasive species such as Guinea grass and haole koa, with Chinese banyan trees near Honouliuli Stream, which runs north to south through roughly the center of the site.

Archeological investigations conducted between 2008 and 2011 have documented more than 140 features at Honouliuli including slab foundations for mess halls, latrines, showers, and administrative buildings, guard tower footings, sidewalks, rock walls, small foundations for steps or porches, and remnants of the security fence (Burton and Farrell 2007). Portions of the water and wastewater systems and utility building foundations indicate the substantial infrastructure required to house the internees and prisoners. Rock-lined pathways and remains of a small pond appear to reflect the civilian internees' attempts to ameliorate the prison atmosphere. Dense vegetation and shallow sediments over much of the gulch, however, hinder visibility of the World War II era ground surface. Many more features and artifacts are likely present.

ISLAND OF HAWAI'I INTERNMENT SITES

On the island of Hawai'i, those arrested were sent to the Kilauea Military Camp (KMC), a military installation located within Hawai'i Volcanoes National Park, Waiākea Prison Camp, and the Hilo Independent Japanese Language School. The FBI's custodial detention

Looking west across Honouliuli Gulch. Photo: NPS, 2011.


Honouliuli Internment Camp -
Historic Layout and Modern Features
Legend
Creek
Ditch
Historic Layout (from Army Blueprints)
Modern Features
Paved Road
Historic Feature (from Army Blueprints)
Modern Features
National Register Boundary
0
550
Feet
1 inch = 550 feet
Compound 1 - POW
Compound 2 - POW
Compound 3 - POW
Compound 4 - POW
Compound 5- Internee Area
Compound 6 - Guard Camp Area
Compound 7 - POW
Well
Well
Water treatment plant
Japanese American Women's Compound
German Americans' Compound
Japanese American Men's Compound
Chicken farm
baseball field
Communications site
Data Sources:
National Register Boundary (NPS), Historic and Modern Features (Burton and Farrell 2012)
The NPS makes no warranty, express or implied, related to the accuracy or content of this map.
September 12, 2014
Produced by the Pacific West Regional Office
San Francisco, CA

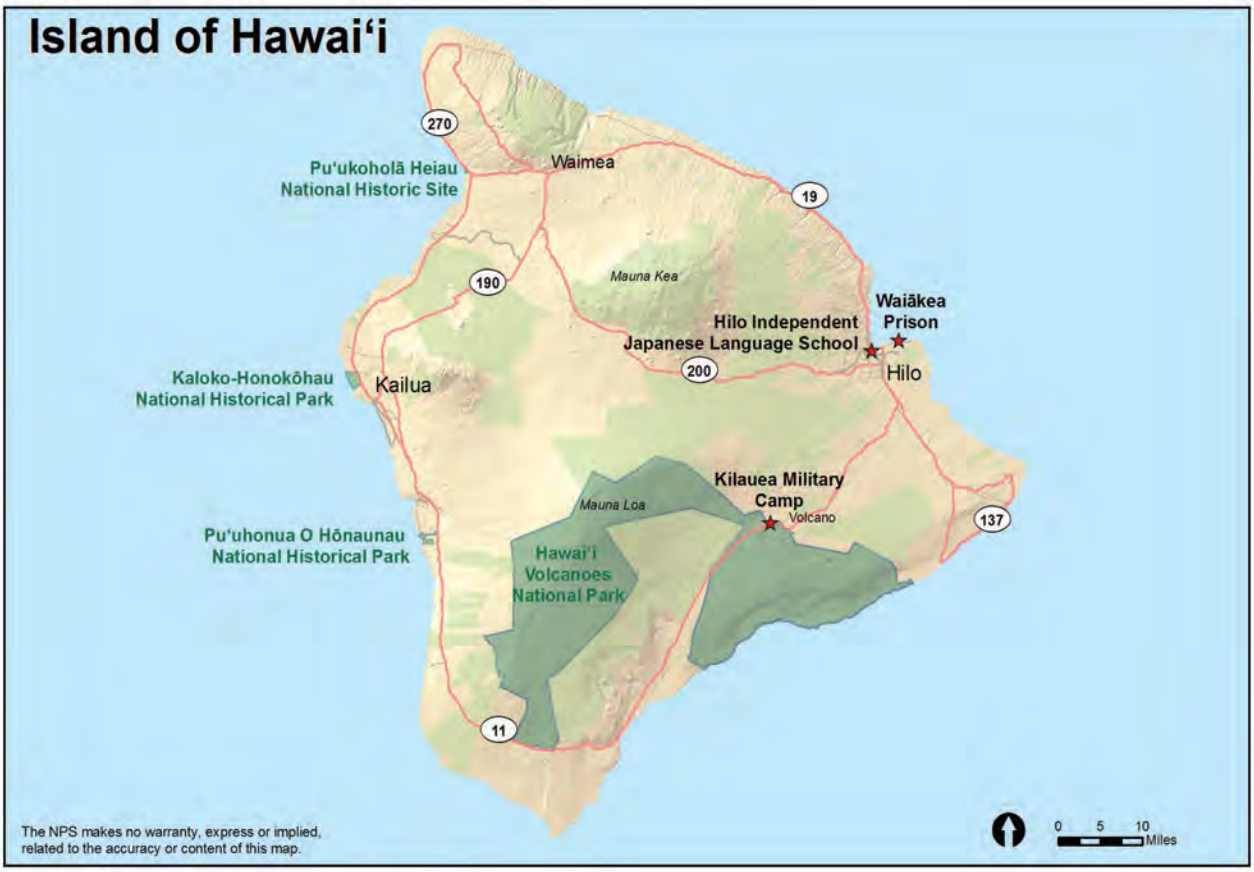
Photos (clockwise from top): **1.** This large concrete slab in the northern section of the gulch marks the site of a World War II-era building. Photo: Burton and Farrell 2007. **2.** Inscription on the base of a former guard tower, Honouliuli Internment Camp. Photo: NPS, 2013. **3.** Dense vegetation obscures and displaces original slab foundations, Honouliuli Internment Camp. Photo: Burton and Farrell 2007. **4.** Numerous remnants of concrete troughs, aqueducts, sidewalks, roads, and other hardscape features have been surveyed. Honouliuli Internment Camp. Photo: NPS, 2011.

list included 82 persons to be arrested at the outbreak of war on the island (Kashima 2003, 69–71). An FBI memo states that on March 26, 1942, 59 aliens and 20 citizens were being held at Kilauea Military Camp (Shivers 1942). However, the total number of arrests must have been much higher than the 79 people these figures indicate, since 106 individuals had already been transferred from Kilauea Military Camp to Sand Island on March 6, 1942. Another 25 internees were transferred to Sand Island on May 12, 1942 (Soga 2007). It is not known how many were temporarily detained and released. A few internees were held at the Waiākea Prison Camp, located near the Hilo Airport. Participants at the Hilo public meeting on June 4, 2014 indicated that a place near the U.S. Post Office at the Hilo Airport was used by the Army National Guard and FBI for interrogation and detaining internees. It was suggested that it could have been a location where internees were first taken before being transferred to other internment locations. Additional research is needed to verify the location and confirm that it was used for internment during World War II.

Kilauea Military Camp (KMC)

Kilauea Military Camp continues to operate as a military recreation area within Hawai‘i Volcanoes National Park. The most intact internment camp structures found in the Hawaiian Islands are at KMC, which occupies approximately 50 acres within Hawai‘i Volcanoes National Park. A comprehensive overview of the history and cultural resources of Kilauea Military Camp was drafted for the U.S. Army Corps of Engineers in 1998 (Tomonari-Tuggle and Bouthillier 1998), and the report provides much of the background information summarized here.

Kilauea Military Camp was established in 1916, the same year as the park, as a training ground for the National Guard and an Army vacation station. By 1937, Kilauea Military Camp had vacation accommodations for 20 officers and their families, three noncommissioned officers and their families, and about 200 enlisted men, as well as the 14 officers and 100 enlisted men of the permanent detachment. But on December 7, 1941, “KMC changed from a recreation camp to an armed camp overnight” (ibid, iii 49). A



Map of internment sites on the island of Hawai‘i.

description of internee life is provided by the Japanese American National Museum on their website:

> At Kilauea, internees had to walk among soldiers armed with bayonets. While food was plentiful and nutritious, the dignity of the people was taken away. Internees were constantly accompanied by soldiers, even to the latrine (Hoshida n.d., 255–59).

In George Hoshida's autobiography, he notes that the internees' barrack was about 100 ft. long and 50 ft. wide, set about 5 or 6 ft. above the gravel-covered ground, with a long verandah enclosed by wire mesh. Opposite the entrance door was a door leading to the shower and the latrine, which were extensions off the back of the building. Hoshida notes that "a portion of the west end was partitioned off and a doorway led into a spacious lounge with fireplace, lounging chairs, and couches." Hoshida estimated there were about 100 internees at Kilauea Military Camp (255–59).

On Feb 15, 1942, it was announced that immediate families could visit the detainees at KMC. But it was also announced that many of the detainees were to be sent to the U.S. mainland in the near future. Each detainee was entitled to have $50 in his possession, and families and friends were instructed to furnish that amount and to provide warm clothes. The military authorities stated that interned aliens could not, under international law, be kept in a combat zone and must be taken to an area where hostilities were unlikely (Tomonari-Tuggle and Bouthillier 1998). By summer, all detainees had been sent to Sand Island on O'ahu or to the U.S. mainland, thus freeing the barrack for military use.

The precise date of closure is unclear. Tomonari-Tuggle and Bouthillier indicate the detainees were gone "by summer," and that from March to October of 1942, Kilauea Military Camp served as Headquarters for the 27th Division of the Army. Internee George Hoshida reportedly left Kilauea Military Camp on May 23, 1942, suggesting that Nikkei internees may have been present for several weeks after the 27th Division arrived (iii–47).

Kilauea Military Camp housed both civilian internees and prisoners of war, but not at the same time. The prisoner of war camp at Kilauea Military Camp, where Okinawan and possibly Korean POWs were held, was added in 1944, on the west side of the camp. Well outside the area used for civilian internees, the POW area was surveyed only cursorily for Tomonari-Tuggle and Bouthillier's Kilauea Military Camp overview, as modern disturbance and vegetation limited visibility of the site.

Physical Remains

A drawing by George Hoshida from World War II can be matched up with existing buildings to a remarkable extent. The drawing's view appears to have been from a point just east of the current café and post office, but Hoshida's perspective is looking down on the buildings, an imagined bird's-eye view. The drawing shows the buildings used by internees with great detail and in the same locations and proportions as today. Three guards with rifles are patrolling on foot, and there is a soldier manning a guard tower.

By combining information from Hoshida's drawing and his written account, it appears that the internee barrack was the building that now houses the café, post office, and Lava Lounge, (Building 34) and the internee mess hall is now the recreation lodge (Building 35). The guard tower depicted in Hoshida's drawing was just south of what is now Building 34. Now there is an anchor from a nineteenth century whaling ship displayed in that area. The current dormitory/laundromat (Building 36) and a row of guest cottages to the west and part of the row of guest cottages to the south are also depicted in Hoshida's drawing.

Most of the discrepancies between the drawing and the current condition of the camp reflect remodeling. Windows and siding have been replaced. The anchor exhibit south of Building 34 may have been installed over the guard tower's foundations. The large cisterns in the drawing to collect water from the building roofs are no longer present. Hoshida's drawing depicts the rooflines of the internment buildings as hipped, while the current recreation lodge and café roofs are gabled. One might suppose that the roofs were remodeled, too, but a 1935 photograph of Kilauea Military Camp also shows gable roofs. This discrepancy may have arisen because Hoshida completed the drawing from memory: the date on the drawing is either 5-25-42 or 8-25-42, and he reportedly left Kilauea Military Camp on May 23, 1942. In addition, in the limited circuit the internees were allowed to walk between the barrack and

Photos (top to bottom): **1.** Kilauea Military Detention Camp. Drawing by George Hoshida, 1942. Courtesy of the Japanese American National Museum. Gift of June Hoshida Honma, Sandra Hoshida, and Carole Hoshida Kanada. **2.** Building 34 at Kilauea Military Camp. Based on primary source evidence from George Hoshida, this structure likely served as the internee barrack. Photo: NPS, 2010. **3.** Kilauea Military Camp cabins, 2006. Photo: Burton and Farrell 2007.

the mess hall, the ends of the roofs would not have been particularly noticeable.

According to Tomonari-Tuggle and Bouthillier, Buildings 34 and 35 were both built in 1916. Building 34, which was used as the internee barrack, was originally a mess hall, measuring 50 by 154 feet, with an 8-foot wide verandah on the south side. It was converted to offices in 1919, but reverted to its mess hall status in 1922, which is also when the lava rock fireplace on the east part of the north side of the building was built. The original building foundation is post and pier with a rock perimeter; additions have concrete slab foundations. Building 35, now the recreation center, was built as an enlisted men's mess hall and converted to a dormitory in 1919. It was used as the internee mess hall in 1943 and became the recreation hall in 1945 (ibid, 17).

Waiākea Prison Camp

In September 1942, six individuals of Japanese heritage from the island of Hawai'i were likely held at the Waiākea Prison Camp, outside Hilo (Okihiro 1992). The camp was established in the 1930s to use prisoner labor to create an airstrip, using only picks, shovels and wheelbarrows (Ellis n.d., 2–3). The airstrip was taken over by the military when the war began, and in January 1942, the Army Commander of Hawai'i District wrote to his superior, "The Waiākea Prison Camp is the most convenient and practicable institution for confinement at hard labor on Hawai'i. The county jail is a rest house [in comparison]." Okihiro notes that some of the Waiākea prisoners were internees who were being punished for being considered troublemakers.

According to the camp's Prison Report, a sentence of one month of hard labor was given for using profane and obscene language. Three months of hard labor for being a "disorderly person," six months for being a "common nuisance," and one year for "possession of excessive amount of currency" and "unlawful possession of a Japanese flag." Waiākea's internees shared the camp with such civil offenders as rapists and burglars (Okihiro 1992, 248).

It is not known how long internees were held at the Waiākea Prison Camp. One account says that under pressure from the military to remove people of Japanese heritage from a critical defense location, the prison camp was

1932 aerial photograph of the landing field at Hilo Airport, near the Waiākea Prison Camp. Photo: Hawai'i Department of Transportation.

moved away from the airport area and prisoners worked on the road to Mauna Loa within Hawai‘i Volcanoes National Park (Ellis n.d.).

Physical Remains

Waiākea Prison Camp is no longer intact, though a former mess hall slab may still exist. The Waiākea Prison Camp was located in the vicinity of 1498 Kalanianaole Avenue and is currently owned by Kamehameha Schools and leased to the Edith Kanakaole Foundation for their use (Mossman, pers. comm. 2013). A complex of new structures exists at the site today.

Hilo Independent Japanese Language School

An additional site, the Hilo Independent Japanese Language School, was identified during the study process as a location where Hilo residents were detained before being sent to O‘ahu (Nunes-Atabaki and Nunes 1999, 41). Beginning in the 1800s, Japanese immigrants came to Hawai‘i to work in plantations. Because many Japanese laborers eventually planned to return to Japan, Japanese language schools were established throughout the territory so that the children of the laborers could learn about the language and culture.

By World War II, the Hilo Independent Japanese Language School was the largest Japanese language school on the island of Hawai‘i. The campus was located at the corner of Ululani and Kukuau Streets. During the war, all Japanese language schools were closed, and the Hilo Independent Japanese Language School became a military police headquarters. The kindergarten building was used as a jail and the principal’s residence was used as a holding cell for temporary detention.

The principal of the school, Imo Shinoda, was briefly detained at his residence before being sent to Kilauea Military Camp. From there he was sent to Sand Island where he was detained for several months. Shinoda was eventually released, as no charges were found against him. The language school never reopened after the war and Imo Shinodo had to find another means of livelihood to support his family. After working for the Hawai‘i Importing Company designing and producing hand-block souvenirs that were popular with military personnel, Imo Shinodo and his wife established and ran a well-known Japanese embroidery school (Nunes-Atabaki and Shinoda Nunes 1999).

Physical Remains

Additional research is needed to determine how many individuals were detained at the language school and the location and condition of any remaining resources.

KAUA‘I INTERNMENT SITES

The FBI’s custodial detention list of December 4, 1942 listed 41 people on Kaua‘i to be arrested in the event of war (Kashima 2003, 71). However, no provisions had been made to house potential internees and it took a few days to gather the internees together (U.S. Army 1942). Most internees on Kaua‘i were housed at the Wailua County Jail on the east side of Kaua‘i, first in the regular jail facilities and then in a dormitory constructed especially for them.

At least ten persons were held for a few days at the Waimea Jail on the southwest side of Kaua‘i, before transfer to the Wailua County Jail (Burton and Farrell 2007, 5). One internee was held in solitary confinement in the Līhu‘e Plantation Gymnasium shower room for a month. Later, Kaua‘i internees were moved to the Kalāheo Stockade. On March 5, 1942, 45 internees from Kaua‘i were transferred to Sand Island (Soga 2007). Three weeks later an FBI memo reported that there were still 20 male aliens, nine male citizens, and one female citizen interned on Kaua‘i (Shivers 1942). The one female citizen was Mrs. Umeno Harada, from Ni‘ihau, whose husband had killed himself after helping a Japanese pilot who had crash-landed on the island. Mrs. Harada was interned for four years, first at the Waimea Jail, followed by Wailua County Jail for two months, the U.S. Immigration Station, Sand Island, and finally at Honouliuli (Burton and Farrell 2007, 21). Mrs. Harada’s daughter stayed with a relative on Kaua‘i (Saiki 1982, 55). Mr. Ishimatsu Shintani, also from Ni‘ihau, was also interned for four years, initially on Kaua‘i and later on the mainland (Burton and Farrell 2007, 22).

Wailua County Jail

The Wailua County Jail was the first place on Kaua‘i where internees were assembled. Initially, conditions were so crowded that health and sanitation problems developed. To alleviate the overcrowding, as well as to separate the internees from regular jail inmates, a two-story dormitory with 48 bunks, a kitchen, and a latrine was constructed (U.S. Army 1942). Reports suggest that the number of internees fluctuated as additional people were arrested;

some were transferred to other internment camps and some were released. For example, Henry Tokutaro Tanaka was arrested February 19, 1942 and taken to Wailua County Jail, where he met 10 to 15 others. The number of internees must have increased over the next few days, because five days later, it was reported that 45 detainees were turned over to the Military Police to be taken to Honolulu, leaving 24 detainees at the Wailua County Jail (Saiki 1982, 170–71). The jail was used to house civilian internees at least until June 6, 1942, when internees including Mrs. Harada were moved to Sand Island.

Physical Remains

A historic photograph shows the Wailua County Jail as a two-story concrete building with a small one-story barracks built behind it. Destroyed by a hurricane and replaced with a modern facility of several one-story buildings, the jail is now known as the Kaua‘i Community Correctional Center (Ashman 2004, 8–9). No buildings related to the internment history remain in that location. Because of restricted access, no archeological reconnaissance has been conducted at the site, and features or artifacts related to the World War II internment may be present and obscured by modern development.

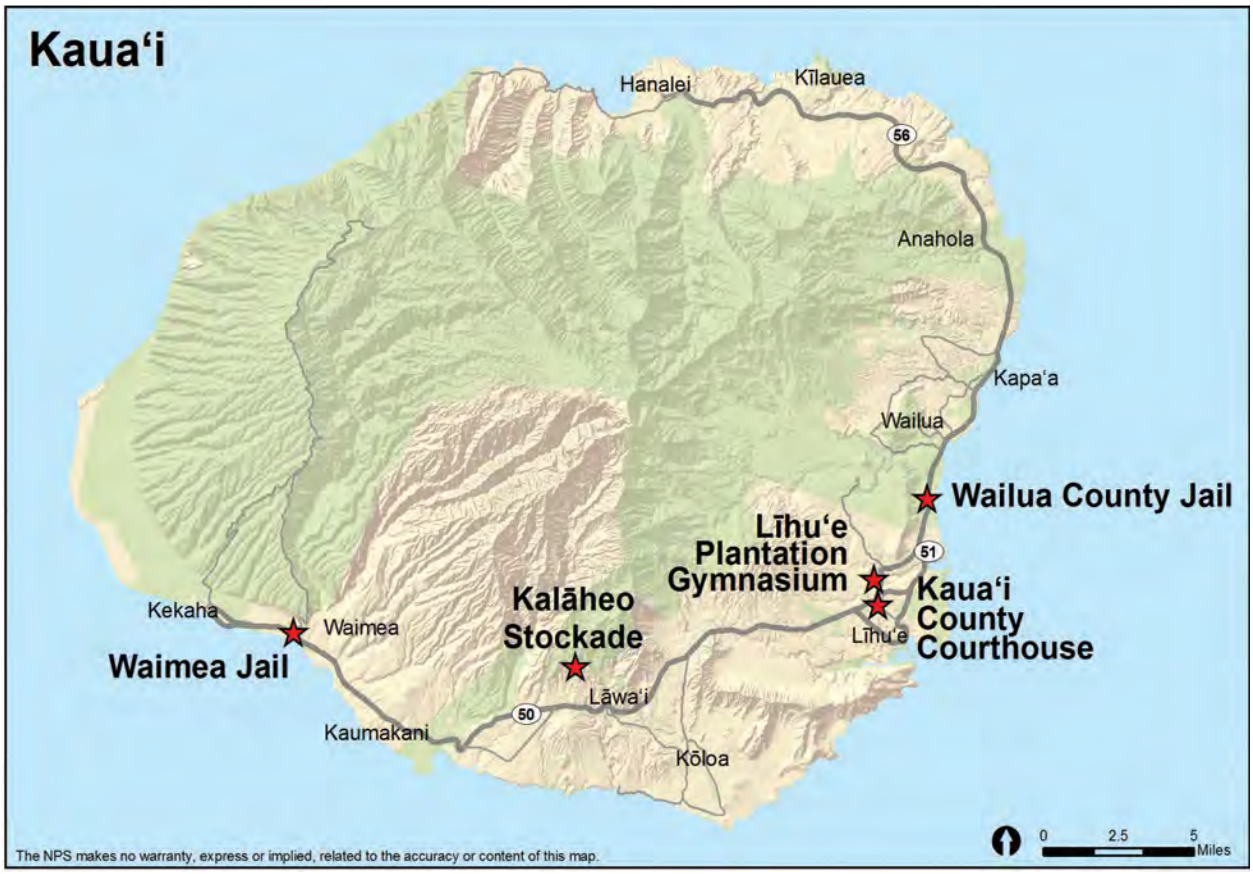
Waimea Jail

Mrs. Harada and Ishimatsu Shintani from Ni‘ihau were taken to Waimea Jail on December 15, 1941 (Beekman 1982). Anecdotal information places at least ten other Nikkei internees there shortly after the Pearl Harbor attack. Okihiro describes one internee’s experience:

Jukichi Inouye, another Japanese language school principal on Kaua‘i, described how his path led to Sand Island. Inouye was arrested in the early morning of December 8 and taken to Waimea Jail where he found several of his friends. The quarters were cramped, the toilet was a bucket, and “there was no place to hide.” After three days, without explanation, Inouye and nine others were placed in a “dump truck” and driven away (Okihiro 1992, 218–19).

Physical Remains

At one time it was thought that Waimea Jail might have been located in the National-Register-listed Gulick-Rowell house, because



Map of internment sites on the island of Kaua‘i.

Photos (top to bottom): **1.** Wailua County Jail, Kaua'i, possibly with internee housing in the background. Photograph taken by Lt. James Daniels during WWII, Kaua'i Museum Archives. **2.** Kaua'i Community Correctional Center, located on the site of the demolished Wailua County Jail. Photo: Burton and Farrell 2007.

its basement was once used as Waimea's jail (Soboleski 2008). However, staff of the Kaua'i Museum and longtime residents of Waimea have indicated that the Waimea Jail where the internees were held was in a structure that has since been demolished. The site is now the location of the county police and fire station in Waimea (Faye, Faye, and Miyake interview 2011, Kaua'i Museum, personal communication December 2013).

Kalāheo Stockade

It is not clear when internees were first held at the Kalāheo Stockade or where it was located. The term "stockade" usually implies a jail within a military camp. The Kalāheo Stockade also jailed, in separate quarters, some 50 members of the Army who had been convicted of criminal offenses or misconduct (Burton and Farrell 2007, 8). The Kalāheo Stockade seems likely to have been part of an established army encampment.

According to Saiki, internees at the Kalāheo Stockade were held in one structure large enough to house 20 to 25 people, with a mess hall, showers, and latrine adjacent. The Vice-Consul of Sweden, G. W. Olson, visited Kalāheo Stockade to check on the status of the internees in 1943 (Burton and Farrell 2007, 23). Olson's report notes that at his September 15, 1943 visit, the Kalāheo Stockade was much improved over its condition reported February 12, 1943. In September it had electric lights, landscaping, lawns, improved sanitary facilities, and land prepared for vegetable gardening. But the Kalāheo Stockade may not have been used for internees after September 1943; at that time Olson reported that there was only one internee, who had been recommended for release by the local hearing board.

Physical Remains

The location of Kalāheo Stockade has not yet been fully determined. Six possible locations were investigated during the 2006 archeological reconnaissance, and additional reconnaissance was attempted in 2014. No conclusive evidence of the stockade was found, but many members of the public believe it to be at or near the Medeiros Chicken Farm. A 1943 military map places the stockade in the Medeiros Chicken Farm vicinity, but to the east. Additional research would be needed to confirm the precise location of the Kalāheo Stockade and condition of any remaining resources.

Medeiros Chicken Farm, possible site of the Kalāheo Stockade. Photo: Burton and Farrell 2007.

Kauaʻi County Courthouse and Līhuʻe Plantation Gymnasium

Participants in the scoping sessions on Kauaʻi also indicated that the County Courthouse in Līhuʻe was a location of importance. This is where Kauaʻi internee hearings were held. The Līhuʻe Plantation Gymnasium was known as a site used for solitary confinement for at least one internee.

Physical Remains

The County Courthouse at 4444 Rice Street was the location of the military court. The building is within the Līhuʻe Civic Center Historic District, listed in the National Register of Historic Places in 1981.

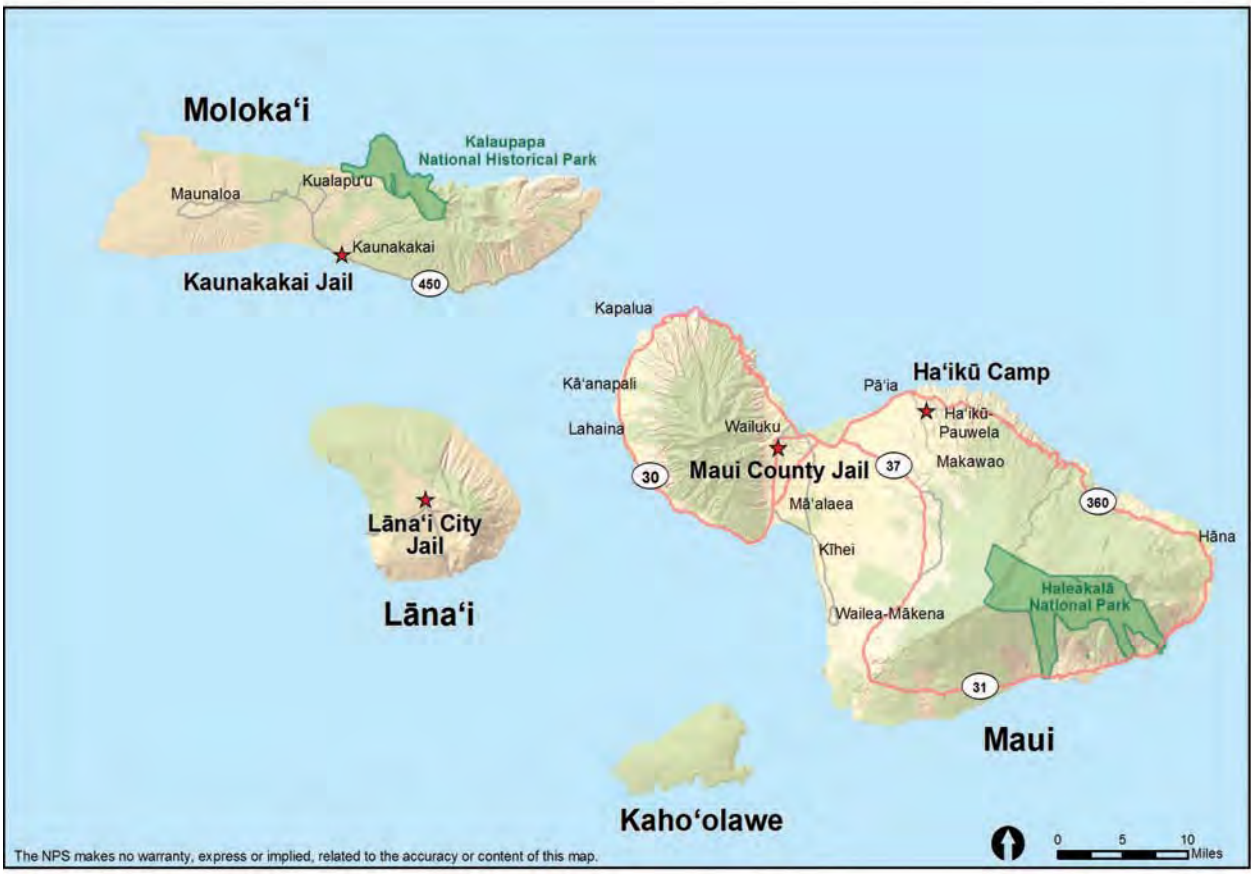
The Līhuʻe Plantation Gymnasium is the only site on Kauaʻi that remains today. It is located in Isenberg Park, and is currently used by the Church of Jesus Christ of the Latter-day Saints (Kauaʻi Museum, personal communication December 2013). Additional research and investigation would be needed to determine the structure's integrity relative to the time of internment.

MAUI INTERNMENT SITES

The two known internment sites on Maui are the Maui County Jail—called the "Detention Camp" in Wailuku, which was located at the site of the current Maui County Correction Center—and the Haʻikū Military Camp in the town of Haʻikū. The FBI's custodial detention list of December 4, 1941 listed 58 people on Maui to be arrested in the event of war; four from Molokaʻi and three from Lānaʻi were also taken to Maui (Kashima 2003, 71). On March 6, 1942, 36 people were transferred from Maui to Sand Island (Soga 2007). The March 30, 1942 FBI memo indicates that 34 aliens and eight citizens were still interned on Maui as of March 26 (Shivers 1942). As at the other internment sites, most of the internees were incarcerated because they were leaders in the Japanese American community, but one Nikkei man was kept at Haʻikū for three days for a blackout violation (Saiki 1982, 70).

Maui County Jail

Records indicate that the Maui County Jail, also called the Wailuku County Jail, was used to detain individuals of Japanese descent. A



Map of internment sites on the islands of Maui, Lānaʻi, and Molokaʻi.

Photos (clockwise from top left): **1.** The Old Police Station in Wailuku may have been used to detain internees temporarily. Photo by Rick Regan: provided as part of National Register nomination form, 1981. **2.** The Old Wailuku Courthouse, seen here in 2006. Photo: Burton and Farrell 2007. The significance of the Police Station and the Courthouse to WWII internment requires further investigation. **3.** Historic cannery building, Haʻikū. Photo: Burton and Farrell 2007. **4.** Roots School, possible United Service Organizations (USO) site of Haʻikū Camp during WWII. Photo: NPS, 2011.

letter from an internee, dated June 3, 1942, identified the return address as "Detention Camp, Wailuku." The original jail building was constructed in 1941 as the county's jail facility, and then was used during World War II as a location to detain internees. It was located at the site of the current Maui County Correctional Center at 600 Waiale Road in Wailuku. Additional research is necessary to determine if the Old Wailuku Courthouse and the Old Police Station, now called the Kalana Pakui Building, were used during internment.

Physical Remains

The Maui County Jail structure was demolished in 1970. The Old Police Station (built in 1928) and the Old Wailuku Courthouse (built in 1907) are part of the Wailuku Civic Center Historic District. The district was listed in the National Register of Historic Places in 1986.

Haʻikū Camp

Internees were held at Haʻikū Camp in tents and temporary structures. The exact dates and numbers of individuals incarcerated at Haʻikū Camp is not known at this time. In his letter of September 23, 1943, Swedish Vice-Consul G. W. Olson reported that Haʻikū Camp was "the best of all the internment camps in the Territory... It is a most delightful place, and being on vacation at the time of my visit I would rather have stayed there than return to the hotel in Wailuku." At the time of Olson's visit on September 8, 1943, there were only four internees, only one of whom was a Japanese citizen; the other three were therefore probably American citizens of Japanese ancestry. All had been recommended for release by the local board. It was not stated why they were still being held (Burton and Farrell 2007, 39).

Physical Remains

The location of the Haʻikū Camp was provided by Kenneth Okano and David Lindsay, both of whom indicated that they were familiar with the approximate location of the camp from direct experience as children during World War II.

Okano noted that the internment camp was set up on an athletic field an estimated 250 feet or so makai (towards the ocean) of the old Haʻikū Pineapple Company cannery. Although Mr. Okano recognized no features of the internment camp, he confirmed that it was located north of the Post Office, west of Haʻikū Road, north of Pokoa Place to Laupapa Place, and west of the old railroad and plantation (ibid., 39).

Lindsay went to visit the Haʻikū Camp during World War II. His personal recollection is that the existing Roots School building located at 740 Haʻikū Road may have been part of the old Haʻikū Pineapple Company and later used for the internment camp (Lindsay, pers. comm. 20 10).

Additional research completed by David Fukuda of the Nisei Veterans Memorial Center confirms the location of the Haʻikū Camp in the area north and east of the existing Haʻikū Post Office. Fukuda interviewed Ty Kakihara, born in 1927, who remembered the area during World War II. He remembered the former dorm for cannery workers was enclosed with a wire fence and guard towers

The camp area is now a residential area. New houses may have obscured or obliterated traces of the camp. One resident of the area noted that historic foundations that had been part of the Haʻikū military camp were being removed for new development (Whittle-Wagner, pers. comm. 2011).

MOLOKAʻI AND LĀNAʻI INTERNMENT SITES

The few individuals of Japanese heritage from Molokaʻi and Lānaʻi interned were jailed locally, and then transferred to the Maui County Jail before being transferred to Oʻahu (Burton and Farrell 2007, 11). Local jails in Kaunakakai, Molokaʻi and Lānaʻi City were the likely locations prior to transfer. The two or three internees from Lānaʻi were held for at least two months, likely at the Lānaʻi City Jail on Gay and 8th Street.

Physical Remains

Each jail and adjacent courthouse in both towns are still standing. The Kaunakakai County Jail and courthouse were moved offsite to a local park to make room for a new public library. The Lānaʻi City Jail and courthouse are in good condition and in their original location. They, along with several other structures in the historic Lānaʻi City downtown area compose a rare intact plantation town and were listed as one of the National Trust for Historic Preservation's 11 Most Endangered Historic Places in 2009.

Photos (clockwise from top left): **1.** Lānaʻi City Jail. **2.** Kaunakakai County Jail, Molokaʻi (moved offsite). **3.** Kaunakakai County Courthouse, Molokaʻi. All photos: NPS, 2011.

A view into daily life at Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Photo: Hawai‘i’s Plantation Village.

CHAPTER 3: RESOURCE SIGNIFICANCE

This section describes the National Park Service's analysis of nationally significant resources within the study area.

Criteria for National Significance

Study areas are evaluated for national significance by applying two sets of criteria: national historic landmark criteria and special resource criteria. National Park Service *Management Policies 2006* mandate that national significance for cultural resources be evaluated by applying the national historic landmarks criteria for national significance. Under §1.3.1 of NPS *Management Policies 2006*, a proposed addition to the national park system must also meet four additional National Park Service special resource study criteria. National Park Service professionals, in consultation with subject matter experts, scholars, and scientists, determine whether a resource is nationally significant. This chapter describes the results of that analysis.

NATIONAL HISTORIC LANDMARK CRITERIA

According to 36 CFR 65.4–National Historic Landmark (See Appendix C), the quality of national significance is ascribed to districts, sites, buildings, structures, and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association, and:

Criterion 1: That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; **or**

Criterion 2: **That are associated importantly with the lives of persons** nationally significant in the history of the United States; **or**

Criterion 3: That represent some great idea or ideal of the American people; **or**

Criterion 4: That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for the study of a period, style, or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; **or**

Criterion 5: That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; **or**

Criterion 6: That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

It should be noted that none of the sites included in this study are currently designated NHLs. However, some of the sites under consideration in this study have the potential to meet NHL criterion 1 and 6 for their association with the history of internment in Hawai'i during World War II. Those events, as outlined below, outstandingly represent broad national patterns of United States history, and the associated resources have the potential to provide an understanding and appreciation of this history for the public.

SPECIAL RESOURCE STUDY CRITERIA

The National Park Service *Management Policies 2006* state that a resource is nationally significant if it meets all of the four following conditions:

1. It is an **outstanding example** of a particular type of resource;
2. It possesses **exceptional value** or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage;

3. It offers **superlative opportunities** for public enjoyment or for scientific study; and

4. It retains a **high degree of integrity** as a true, accurate, and relatively unspoiled example of a resource.

Significance of the Events: Incarceration of Civilians in the U.S. during World War II

The internment and incarceration of Japanese Americans and others during World War II on the mainland and in Hawai'i are nationally significant events that shape our understanding and commitment to civil liberties and the fair treatment of all citizens, regardless of race. By identifying the commonalities and distinctions between mainland and Hawai'i stories, this study concludes that the internment in Hawai'i is of national significance, distinct from mainland incarceration. Through it, we are able to more fully understand the abrogation of civil liberties that occurred in the U.S. and its territories.

As outlined in the Historical Overview in Chapter 2, the incarceration of Japanese Americans and legal resident aliens of Japanese ancestry on the mainland during World War II has been recognized as an important episode in United States history. The government's official investigation, conducted by the Commission on Wartime Relocation and Internment of Civilians (CWRIC), concluded as follows,

> The promulgation of Executive Order 9066 [the order that allowed the mass incarceration of Nikkei] was not justified by military necessity, and the decisions that followed from it - exclusion, detention, the ending of detention and the ending of exclusion - were not founded upon military considerations. The broad historical causes that shaped these decisions were race prejudice, war hysteria, and a failure of political leadership. Widespread ignorance about Americans of Japanese descent contributed to a policy conceived in haste and executed in an atmosphere of fear and anger at Japan. A grave personal

Barracks and tents at Honouliuli, with the women's internee compound in the background. A portion of the rock wall visible behind still stands on the site today. Photo by R. H. Lodge, c. 1945, courtesy Hawai'i's Plantation Village.

> injustice was done to the American citizens and resident aliens of Japanese ancestry who, without individual review or any probative evidence against them were excluded, removed and detained by the United States during World War II (CWRIC 1997, 194).

This finding has had profound consequences not only for the Japanese American community, but for all Americans. The national importance of the internment and incarceration, its repercussions, and eventual redress has been reinforced by the involvement of Presidents Ford, Carter, Reagan, G. H. W. Bush, Clinton, and G. W. Bush with statements and legislation decrying the incarceration and affirming civil rights.

The story of imprisonment of Nikkei on the mainland has been recounted in numerous histories, diaries, analyses, legal discussions, and even plays and films. It is the focus of exhibits, educational programs, and memorials from California to Washington D.C. Four historic sites have been set aside by the federal government to be preserved and to provide opportunities for public education and interpretation of the incarceration of Japanese Americans during World War II: Manzanar National Historic Site, California; Minidoka National Historic Site, Idaho; Bainbridge Island Japanese American Memorial called Nidoto Nai Yoni, Washington; and the Tule Lake Unit of World War II Valor in the Pacific National Monument, California. All four sites are on the mainland.

The history of civilian internment in Hawai‘i during World War II is little known and has not received the same level of scholarship, educational programs, and attention as on the mainland, but it is no less significant. As on the mainland, internment in Hawai‘i was based on the idea of military necessity, and as on the mainland, the internment in Hawai‘i was later found to be an unjust abrogation of civil rights. On both the mainland and in Hawai‘i, official government investigations conducted before the war indicated that resident Japanese aliens and Japanese American citizens were not likely to pose a threat to U.S. security, and that only a small number of persons should be detained (Kashima 2003, 69). No Japanese Americans were ever charged or convicted of treason on the mainland, and the only cases of espionage in Hawai‘i involved a Japanese consular agent and a German resident alien (Allen 1950, 140–41). Both on the mainland and in Hawai‘i, the internment and incarceration illustrates the ambivalence with which the United States, a nation of immigrants, treated its immigrant population. On both the mainland and in Hawai‘i, the incarceration resulted in economic hardships and long-lasting psychological and social repercussions for the people who experienced it. Both on the mainland and in Hawai‘i, the history of internment and incarceration epitomizes how civil rights can be brushed aside in a time of crisis. Both mainland and Hawaiian incarceration sites embody the challenges the United States faces, even today, maintaining constitutional rights for American citizens. But the incarceration in Hawai‘i also differed in several key ways from the mainland, as described below.

The first key distinction is that internment of American civilians in Hawai‘i was authorized by martial law, rather than Executive Order 9066. The declaration of martial law in Hawai‘i provided a way to control the entire population, and one of the military's justifications for martial law in Hawai‘i was that the local population could not be trusted (Anthony 1975, 79). As Anthony relates,

> The orders of the military governor proceeded upon the theory that after the declaration of martial law and the assumption by the commanding general of the office of military governor of Hawai‘i all power, legislative, executive, and judicial, vested in him; that he was not bound by the laws of the United States, the Territory of Hawaii, or the Constitution itself (Anthony 1975, 12–13).

In *Duncan v. Kahanamoku*, the U.S. Supreme Court decided in 1946 that the military tribunals established under martial law in Hawai‘i did not have jurisdiction over common criminal cases. In effect, the ruling said that although the original declaration of martial law in Hawai‘i was justified, its continuation after the immediate threat of invasion had ended was unconstitutional. Scholars Scheiber and Scheiber state:

> The record of military rule in wartime Hawai'i is without precedent in American history . . . It also differed from the internment of Japanese Americans [on the mainland] because it involved a complete suspension of constitutional liberties for an entire civilian population. There is abundant evidence that civilians from all ethnic groups were subjected to arbitrary and humiliating treatment. "While fighting for democracy on a dozen fronts," the Interior Department solicitor wrote in December 1942, "we have [a]dictatorship, quite needlessly—almost by accident, in one vital part of the United States of America." That sentiment was echoed in a confidential 1946 investigation of Hawai'i's wartime military courts, in which a Justice Department counsel concluded without qualification: "It's a very, very nasty unpleasant picture, and you just cannot justify it in any way" (Schreiber and Schreiber 2003).

As Scheiber and Scheiber conclude, the *Duncan* decision came too late for the civilians whose lives had been so deeply affected by the Army regulations, and especially for the hundreds who had been sentenced to months or years in internment camps without the rudiments of a fair trial.

Second, although martial law affected all Hawaiian residents, internment in Hawai'i directly affected only a small percentage of the population. Although the threat of sabotage, aiding and abetting, and espionage was potentially much greater in Hawai'i than on the mainland, less than 2 percent of the Hawaiian Nikkei were interned. Thirty-seven percent, or 158,000 of the 420,000 people living in Hawai'i during World War II were of Japanese ancestry, and people of Japanese descent were well integrated both socially and economically in the islands. In contrast, the 127,000 Nikkei living on the mainland formed less than 1 percent of the population, yet 100 percent of those living on the West Coast were incarcerated in camps run by the War Relocation Authority and Department of Justice.

The distinction between the treatment of Nikkei in Hawai'i and on the mainland during World War II is linked to the manner in which immigrants were recruited, accepted, and integrated into Hawaiian society. It also had significant beneficial consequences for Hawai'i's role in World War II. The government's more strategic approach to the internment of Japanese aliens and U.S. citizens of Japanese ancestry, for example, not only allowed persons of Japanese ancestry in Hawai'i to contribute fully to the war effort in civilian roles, it fostered the creation of the 100th Infantry and the all-Nisei 442nd Regimental Combat Team. When the military was reopened to Japanese Americans, almost 10,000 men from Hawai'i volunteered, of whom more than 2,600 were accepted. In contrast, there were only 1,250 volunteers from the mainland camps (Weglyn 1976, 144, 306n). This discrepancy in the rate of volunteering for military service is directly related to the discrepancy in treatment: many young Japanese American men on the mainland had tried to join the military as soon as the war started, but were declared unfit for service due to their race. By the time the military allowed them to serve, they and their families were already incarcerated. Some even resisted the draft

Sketch of internees working on crafts at Honouliuli by Dan T. Nishikawa, April 29,1943. Courtesy of the Japanese Cultural Center of Hawai'i, Dan Toru Nishikawa Family Collection.

after it was reinstated for Japanese Americans, as a protest against the incarceration of their families (Lyon 2012; Muller 2001; Hohri et al 2001; Mackey 2002). Eventually, the combined 100th and 442nd all-Japanese American battalions compiled a distinguished record fighting in the European Theater, earning three Presidential Unit Citations and many individual decorations (U.S. Army Center of Military History 2000).

Third, although the more limited internment in Hawai'i was less damaging to the morale of the general population, it may have had even more insidious effects on those individuals interned. Internment on the mainland was psychologically and financially devastating for the internees, and the entire Japanese American population on the West Coast was directly affected. Therefore, it would have been difficult to argue that this entire population, including U.S. military veterans, the elderly, and babies, was potentially guilty of treason. In Hawai'i, individuals were singled out, and therefore stigmatized and treated as though there could have been a valid reason for their internment. The effect on the individuals and their families was even more devastating (Kashima 2003, 85), and in some cases, children were left to fend for themselves when parents and older siblings were interned (Nye 2005).

Finally, public awareness during and since World War II about the internment in Hawai'i compared with the mass incarceration on the mainland was and continues to be remarkably different. The internment in Hawai'i was largely kept secret during World War II and has only been a subject of scholarship and educational efforts in recent decades. Whereas on the mainland, the mass incarceration was well known along the West Coast primarily because all persons of Japanese ancestry were excluded and confined, and the media played an important role in promulgating wartime hysteria and broadcasting the many aspects and events of the mass incarceration. Scholar Tetsuden Kashima points out the secrecy imposed and maintained by the military in Hawai'i,

> Many Japanese Americans in Hawai'i [and other residents] are still unaware of the full story of forced detention and removal of island persons to the mainland and the existence of the [internment] camps. Martial law and use of the

View to Pearl Harbor from overlook, Honouliuli. Photo: NPS, 2013.

> military-security classification restricted information about the entire wartime episode (Kashima 2003, 85).

The secrecy surrounding internment in Hawai'i has come to an end due to the research efforts of scholars like Tetsuden Kashima and Gary Okihiro and especially the Japanese Cultural Center of Hawai'i and faculty and students at the University of Hawai'i—West O'ahu.

National Historic Landmark Criteria Analysis

The 17 internment sites in Hawai'i were considered for their role and importance in telling the internment story. For each site, the duration of use, number of internees held, and condition and status of the site were considered based on the best available information. The internment history of each site was researched and documented.

Based on the findings and analysis in this study, two sites, Honouliuli Internment Camp and the U.S. Immigration Station, are found to be nationally significant as defined in the NHL guidelines (See Map: Nationally Significant Sites, Island of O'ahu). The study team received concurrence from the Washington Office of the National Historic Landmarks Program on the determination of national significance for the Honouliuli Internment Camp and the U.S. Immigration Station.

The other 15 sites had significantly shorter occupations, held small numbers of internees, played a peripheral role in the internment history, and/or lacked historic integrity. Certain sites merit greater recognition related to their internment history but fail to meet the NHL criteria for national significance. More detailed information about the other 15 sites is located later in this chapter in the section: Significance of Additional Sites Associated with Civilian Internment during World War II.

Honouliuli Internment Camp and the U.S. Immigration Station sites are associated with several of the nationally significant themes identified in the *Japanese Americans in World War II National Landmark Theme Study,* as manifest in the special circumstances of internment in Hawai'i, described above. The sites exemplify the themes of: *Politics/ Government* for the critical role of the federal government (the FBI and the military) in the internment of citizens and immigrant aliens; *Law* for the constitutional questions that were raised by the internment and martial law versus the protection of civil liberties in time of war; *Military* for the role of the Army and martial law in the internment; *Ethnic Heritage and Social History* for the internment's association with the treatment of minority populations on the home front during World War II, and as part of the general history of minorities in the U.S.

The Honouliuli Internment Camp and the U.S. Immigration Station held citizens and immigrants of other ethnicities too, demonstrating that internment affected people of Japanese and European ancestry during World War II.

HONOULIULI INTERNMENT CAMP

Opened in 1943, the Honouliuli Internment Camp was the last, largest, and longest-used World War II confinement site in Hawai'i. The camp was built to intern Japanese and European Americans, Japanese and European resident aliens, and POWs captured in military operations during World War II. As both a civilian internment camp and a prisoner of war camp, the Honouliuli site embodies two different facets of World War II: the control of U.S. residents and citizens and the treatment of enemy soldiers. The fact that these two seemingly distinct classes of people were incarcerated at one site indicates that the two groups were considered equivalent, at least in some ways.

As an internment site, Honouliuli represents the fragility of constitutional rights, and is a physical symbol of the prejudice and discrimination that immigrants experienced. Honouliuli is also a rare and tangible manifestation of martial law, which had a profound effect on all citizens of Hawai'i but which left little imprint on the landscape. Internment loomed as a threat even to those not held for long periods of time.

As a prisoner of war camp, Honouliuli illustrates how the U.S. military handled and housed an influx of prisoners of war, balancing compliance with the Geneva Convention with demands for national security. The POWs held at Honouliuli included soldiers and labor conscripts from Korea, Okinawa, Taiwan, Japan, and Italy. Honouliuli's separate POW compounds for

Honouliuli Gulch and Associated Sites Special Resource Study
Nationally Significant Sites, Island of O'ahu
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
Nationally Significant Sites
World War II Valor in the Pacific NM
Other Internment Sites on Oahu
0 1.25 2.5 5 Miles
Honouliuli Internment Camp
World War II Valor in the Pacific National Monument
Honolulu Police Department Yokohama Specie Bank/U.S. Army Police Station
Sand Island Detention Camp
U.S. Immigration Station
Waialua
Wahiawa
Schofield Barracks
Wheeler Army Airfield
Kunia
Pearl City
Waipahu
Naval Station Pearl Harbor
Pearl Harbor
Ford Island
Hickam Afb
Hickam Air Force Base
Navmag Pearl Harbor West Loch
Ewa Beach
Kaneohe
Kaaawa
Honolulu
Sacred Falls State Park
Kaneohe Bay
Mamala Bay
Diamond Head State Monument
Data Sources:
Hawaiian Watersheds (State of Hawai'i), National Hydrography Dataset (USGS),
Honouliuli Internment Camp (NPS), World War II Valor in the Pacific National Monument (NPS)
The NPS makes no warranty, express or implied, related to the accuracy or content of this map.
Produced by the Pacific West Regional Office
San Francisco, CA
September 2014

Korean enemy non-combatants and the stories of the three Korean students who worked for the United States military before reverting to POW status at Honouliuli reveal the antagonism between Japan and its forced allies (Ch'oe 2009). In addition, the large capacity of the POW compounds reflects a change in the course of the war. By the time Honouliuli was constructed and put to use, the Allied forces were winning more battles in the Pacific and taking more prisoners. Archeological and archival evidence indicates Honouliuli was expanded during its occupation. With one compound added and others modified to accommodate the influx of POWs, Honouliuli illustrates the changes in the U.S. war fortunes, as more and more members of the enemy military were captured in the Pacific war zones.

The analysis indicates that the Honouliuli Internment Camp meets national significance criterion 1 for " its association with **events** that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained" (NHL 1997).

Honouliuli Internment Camp likely meets NHL criterion 6 for its potential to yield information of major scientific importance as it relates to the treatment of Japanese and European internees and POWs during World War II. Archeological features and deposits throughout the site could provide comparative data about expressions of ethnicity, confinement and identity (Burton and Farrell 2008).

U.S. IMMIGRATION STATION

The U.S. Immigration Station was listed in the National Register of Historic Places at the state level of significance in 1973 (listed as the U.S. Immigration Office). Although the nomination outlines the history of immigration to the Hawaiian Islands, the buildings were considered more significant for their architecture than for their association with significant events in U.S. history. Designed by Charles W. Dickey, the station's architecture directly relates to its role in immigration history: the station was

Main entry, U.S. Immigration Station former administrative building, 2006. Photo: Burton and Farrell 2007.

"designed to fit the climate and atmosphere of Hawai'i and to be an inviting place for immigrants to come through" (NPS 1973). As the nomination form notes,

> The entrance portico… reflects Hawai'i and the U.S. Immigration Station's function as a bridge between East and West. The portico is accented by Chinese architectural details and the large bronze compass plaque set in the floor of the entrance lobby shows Hawai'i as the crossroads of the Pacific by indicating distances to principle cities on the Pacific rim.

These buildings symbolize the coming to the Islands of the numerous ethnic groups which make up Hawai'i's present population. It is a great source of local pride that on the foundation of an open Hawaiian culture, a fusion of races and cultures is evolving in which the many immigrant groups are losing their separate identities and by intermarriage creating "one people" (NPS 1973).

The U.S. Immigration Station's World War II history enhances and expands the U.S. Immigration Station's importance. The U.S. Immigration Station was used for a number of purposes related to internment. O'ahu internees were initially confined at the U.S. Immigration Station following the attack on Pearl Harbor. Some were sent to Sand Island, and then on to mainland camps, or after its creation, to Honouliuli Internment Camp (Burton and Farrell 2007).

All of the hearings for arrested individuals in O'ahu (and likely for all other Hawaiian residents) were held at the U.S. Immigration Station. Some individuals were held in the courtyard or in holding cells in back of the main building. Many arrested individuals were shuffled back and forth from Sand Island and Honouliuli to the U.S. Immigration Station for their hearings and eventual release. Internees were often required to come back to the U.S. Immigration Station after release to process paperwork related to their parole.

The U.S. Immigration Station, Honolulu, as it appeared in 1938. Photo on display at the U.S. Immigration Station.

Scholar Alan Rosenfeld uncovered evidence which indicates that virtually all internees from the Hawaiian Islands may have passed through the U.S. Immigration Station. Military authorities completed daily reports through 1942-1944 detailing traffic through the U.S. Immigration Station. One report documents 219 detained individuals at the U.S. Immigration Station from February 20 to February 21, 1942 (Department of the Army 2012).

The analysis of the central role of the U.S. Immigration Station in Hawai'i's internment history indicates that the U.S. Immigration Station meets national significance criterion 1 for " its association with **events** that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained" (NHL 1997).

Today, almost 40 years after the original national register nomination and with new information about the history of immigration in the U.S., it is likely that the U.S. Immigration Station could be considered nationally significant for its role in immigration history in Hawai'i. Similar immigration stations, like Angel Island in California, have been determined to be of national significance as primary portals for hundreds of thousands of immigrants from Asia and the Pacific. Additional research and analysis should be conducted on the national significance of the U.S. Immigration Station as it relates to immigration in the United States.

The U.S. Immigration Station in Honolulu is considered nationally significant for its role in Hawai'i's incarceration history alone and meets NHL criterion 1. When its importance to immigration is also taken into account, its significance could be twofold.

Special Resource Study Criteria Analysis

The following section applies the special resource study criteria to the Honouliuli Internment Camp and the U.S. Immigration Station. For some criteria, both sites are analyzed together for their similar themes. Other criteria require an analysis of each site.

Photos (top to bottom): **1.** Modern chicken shed constructed of World War II-era scrap materials. World War II building in the guard camp area in the background. **2.** Dry stone wall, Honouliuli Internment Camp. **3**. Existing septic tank access, Honouliuli Internment Camp. All photos: NPS, 2011.

1. OUTSTANDING EXAMPLE

The Honouliuli Internment Camp is a nationally significant site which meets NHL criterion 1 as an outstanding example of a resource associated with the World War II internment of civilians in Hawai'i and NHL criterion 6 for the archeological features and remains that are likely to augment important information about military control of POWs and internees, and how the prisoners responded (Burton and Farrell 2008). The U.S. Immigration Station is an outstanding example of an initial detention site and the primary location for hearings and processing of all internees from Hawai'i; it meets NHL criterion 1. Each site may also be an outstanding example of additional themes important in U.S. history: the treatment of prisoners of war at Honouliuli, and the treatment of immigrants at the U.S. Immigration Station.

2. EXCEPTIONAL VALUE IN INTERPRETING HISTORICAL AND CULTURAL THEMES

The National Park Service has developed a thematic framework for evaluating the significance of resources for designation as national historic landmarks, or for potential addition to the national park system. The NPS thematic framework "is used to help identify cultural resources that embody America's past and to describe and analyze the multiple layers of history encapsulated within each resource" (NPS .n.d.). Honouliuli Internment Camp and the U.S. Immigration Station both possess exceptional value in illustrating and interpreting five of the themes identified in the framework: *peopling places, creating social movements, expressing cultural values, shaping the political landscape,* and *changing role of the United States in the world community.*

Peopling places: The internment of U.S. citizens and civilian aliens at Honouliuli Internment Camp and the U.S. Immigration Station demonstrates the ambivalence of officials in Hawai'i toward immigrants: immigrants were valued for the labor they contributed, were integrated into the culture of the Hawaiian Islands, but they were also sometimes viewed with suspicion. The internment reflects conflict between the U.S. government and its immigrants and citizens through the acts of imprisonment and incarceration. Immigration and the evolution of communities are represented by the history of Japanese, Chinese, Filipino, and European settlers who immigrated to Hawai'i and settled in Honolulu and the rural areas of Hawai'i, and the communities they formed. This theme also is represented by how other ethnic groups were affected by the internment in Hawai'i.

The U.S. Immigration Station exhibits exceptional value in illustrating and interpreting the theme of *peopling places* through its direct and significant role in immigration.

Creating social institutions and movements: The NPS notes that "Americans generate temporary movements and create enduring institutions in order to define, sustain, or reform their values" (NPS 1996, 8) and this theme is illustrated by the internment sites. Honouliuli Internment Camp and the U.S. Immigration Station were used to incarcerate community leaders who created organizations to honor and perpetuate Japanese cultural values. Now, Honouliuli Internment Camp is associated with the creation of social movements that examine this aspect of World War II history in relation to the U.S. Constitution and American ideals of equality and justice. The site contributes to the civil liberties movement by reaffirming these values through education, pilgrimages, and days of remembrance.

Expressing cultural values: As a nation of immigrants, the United States accrues the cultural values of many different ethnic groups. Internees of Japanese ancestry at Honoulilui and the U.S. Immigration Station demonstrated their cultural ideals of perseverance and honor when faced with loss of cultural identity during the war: for example, "gaman," meaning patience and perseverance, and "Ganbare!" (Japanese for "hold on!" or "persevere!") were expressed through poetry, art, landscapes, and other actions during the World War II incarceration. Both sites provide a tangible places to interpret the many personal stories and anecdotes associated with the broader confinement of Japanese Americans and European Americans that illustrate cultural values.

Perhaps most importantly, cultural values embodied in the U.S. Constitution are compellingly expressed by the fight to recognize

the injustices of incarceration which began during World War II and continue today. *Cultural values* (including perseverance and faith in the government and U.S. Constitution) are also expressed through the efforts of several internees to fight their incarceration by pursuing legal redress through the American court system.

In addition, the U.S. Immigration Station *expresses cultural values* and the sometimes contradictory nature of those values: the station's architecture was designed to welcome immigrants to this land of opportunity, but the station's use as a holding and hearing center during World War II illustrates immigrants' treatment as a security risk during times of crisis.

Shaping the political landscape: The events of this time were also responsible for *shaping the political landscape,* which includes military institutions and activities, government institutions, and political ideas. All aspects of American life were profoundly affected by the war, including in Hawai'i. Honouliuli and the U.S. Immigration Station are important physical manifestations of the effects and reach of martial law, which has been rarely implemented in this country (Yamasaki 1991). On the islands, the concern for military security led to the internment, but the war also led to the formation of the Varsity Victory Volunteers and later the 100th Infantry Battalion—442nd Regimental Combat Team, whose unquestionable valor and loyalty led to greater acceptance of Japanese Americans in the larger American society.

Honouliuli illustrates how martial law and internment *shaped the political landscape* through legislation and court rulings regarding internment and martial law. Honouliuli was associated with important legal rulings, including *Duncan v. Kahanamoku* in which the U.S. Supreme Court decided that the military tribunals established under martial law in Hawai'i did not have jurisdiction over common criminal cases. Two of three German American citizens who challenged their internment in Hawai'i were held at Honouliuli (Burton and Farrell 2008).

The U.S. Immigration Station has exceptional value in illustrating the theme of *shaping the political landscape* through its role in enhancing the ethnic, cultural, and political diversity of people in Hawai'i and therefore of the United States.

Changing role of the United States in the world community: This theme includes immigration, cultural exchange, security, defense, and international relations. Honouliuli and the U.S. Immigration Station have exceptional value in illustrating and interpreting these aspects of our history. They illustrate our relationships with other countries, especially enemy nations, not only in the incarceration of immigrants but also in the adherence to the Geneva Conventions for the treatment of POWs.

Honouliuli was established to incarcerate civilians and POWs outside the active battle zone in Pearl Harbor to comply with Geneva Convention standards for the treatment of POWs (Burton and Farrell 2008). Internally, separate compounds were established for groups of civilians and POWs, largely based on ancestry. The activism of Korean POWs at Honouliuli helped shape the political landscape of their own country and Korea's relations with the United States. In addition, the humane treatment of Japanese POWs at Honouliuli and other POW camps had beneficial repercussions for later relationships between Japan and the United States, illustrating the *changing role of the U.S. in the world community*.

The U.S. Immigration Station's recent change in administration illustrates the *changing role of the United States in the world community*: the 70-year-old United States Immigration and Naturalization Service was dismantled by the Homeland Security Act of 2002 and separated into the U.S. Immigration and Customs Enforcement, U.S. Customs and Border Protection, and the U.S. Citizenship and Immigration Services, all within the Department of Homeland Security. The U.S. was, and still is, the land of opportunity for people from all over the world, but the country continues to struggle to balance the ideal of welcoming immigrants and visitors with the need for internal security and safety, echoing the motivation and rationale behind the World War II internment episode.

Both sites are of exceptional value in interpreting historical and cultural themes and meet criterion 2.

3. SUPERLATIVE OPPORTUNITIES FOR PUBLIC ENJOYMENT AND SCIENTIFIC STUDY

Honouliuli Internment Camp and the U.S. Immigration Station are located not far from Pearl Harbor and its interpretive sites that commemorate other aspects of the war. Both sites can provide information about one of the ways the war affected civilians: the incarceration of citizens and resident immigrants of "suspect" ethnicity or heritage. As tangible links to an event in which fear exacerbated racism and led to the suppression of civil rights during World War II, these sites can inform today's discussions about the relationship and interplay of national security and the U.S. Constitution. They provide an opportunity to more fully interpret the story of internment and incarceration in the U.S. during World War II.

Honouliuli Internment Camp

Opportunities for Public Enjoyment

Honouliuli Internment Camp offers outstanding opportunities for public interpretation about the internment of civilians and POWs during wartime. Educational opportunities go beyond World War II and also include opportunities in ethnic studies, political science, and civil rights. Hawaiian residents and visitors alike will relate to, and perhaps empathize with, the civilian prisoners at Honouliuli, who were of diverse backgrounds and represented several different ethnicities. In addition, Honouliuli is a rare tangible example of three aspects of the war: the effects of martial law on civilians, which regulated an astounding amount of everyday life; the changing course of the war in the Pacific, as more and more prisoners were captured and needed housing; and the hostilities and tension between Japan and its forced allies, as separate compounds had to be designated for Japanese and Korean POWs. Further, as it represents the treatment of POWs, the rights and meaning of citizenship, and the difficulty balancing civil rights with national security, Honouliuli has great potential to generate public discussion and discourse relevant to today's political world.

Physically, Honouliuli continues to evoke the isolation and remoteness felt during the time of internment (Burton and Farrell 2007). As the current site of an annual Day of Remembrance pilgrimage and tours sponsored by the Japanese Cultural Center of Hawai'i, that feeling of

Students in a summer archeology course at the University of Hawai'i–West O'ahu conduct fieldwork at Honouliuli. Photo: Valentino Valdez.

confinement evoked by the gulch itself, in a remote setting surrounded by agricultural fields, is still felt today by visitors to the site.

Finally, given its location near Pearl Harbor and interpretive sites that commemorate the beginning of the war (USS *Arizona* Memorial) and the end of hostilities (Battleship *Missouri* Memorial), Honouliuli can be incorporated into an interpretive program that provides the public with a more complete understanding of World War II history.

Opportunities for Scientific Study

Protected by its isolated location amidst agricultural lands, Honouliuli offers the greatest potential for identification of archeological remains when compared to other internment sites in the state of Hawai‘i. Honouliuli has tremendous research potential and could yield information of major scientific importance as it relates to the treatment of Japanese and European internees and POWs during World War II.

The site is also located adjacent to a parcel of land owned by the University of Hawai‘i—West O‘ahu (UHWO), and the faculty and staff of UHWO have expressed strong interest in working with the NPS to continue archeological research and studies in World War II history, democratic studies, Pacific Area studies, and other social sciences using Honouliuli as a focal point.

U.S. Immigration Station

Opportunities for Public Enjoyment

The U.S. Immigration Station, located on a major thoroughfare in the Honolulu metropolitan area, is adjacent to Honolulu's downtown civic center and within 3 miles of Waikiki. The U.S. Immigration Station's history as a "round-up," interrogation, and processing site is fundamental to understanding the history of internment in Hawai‘i and has great potential to generate public discussion about the incarceration of citizens and civilian aliens. However, the U.S. Immigration Station complex is actively used for Department of Homeland Security offices.

Opportunities for Scientific Study

The U.S. Immigration Station holds great research potential in uncovering the inner workings of the government's action to identify, locate, detain, interrogate, and process internees. As the primary location where these activities occurred, the U.S. Immigration Station's history is vital to a complete understanding of internment in Hawai‘i.

Photos (top to bottom): **1.** Entry to the U.S. Immigration Station. **2.** Bus stop outside the U.S. Immigration Station. **3.** U.S. Immigration Station detention building. All photos: NPS, 2013.

Archival research could yield this information. In addition, the U.S. Immigration Station had a profound role as a port of entry for waves of immigrants coming from Asia and the Pacific beginning in the 1930s. Research on this aspect of the U.S. Immigration Station's history is needed and could yield significant information about immigration from Asia. More research could determine whether the U.S. Immigration Station is eligible for national historic landmark listing related to its immigration history.

Both sites provide superlative opportunities for public enjoyment and scientific study.

4. HIGH DEGREE OF INTEGRITY

A nationally significant site or resource must retain a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource. Seven attributes are used to evaluate integrity: location, design, setting, materials, workmanship, feeling, and association. This evaluation of integrity fulfills both the national historic landmark and special resource study requirements.

Because of their temporary nature, sites associated with the internment and incarceration of Japanese Americans during World War II present unique challenges in evaluating national historic landmark criteria for integrity. As the incarceration sites were not intended to be permanent, buildings were often removed very soon after the war's end. As such, evaluation of integrity must be considerate of more subtle aspects of integrity, such as the ability of the environment, landscape, building and site plan remnants to convey a sense of place and feeling.

The *Japanese Americans in World War II Theme Study* (theme study) provides guidelines for evaluating the significance and integrity of associated properties based on the evaluations of previously designated national historic landmarks including: Granada Relocation Center (Colorado), Heart Mountain Relocation Center (Wyoming), Manzanar Relocation Center (California), part of the Rohwer Relocation Center (Arkansas), Topaz Relocation Center (Utah), and Tule Lake Relocation Center (California) (NPS 2012). Such considerations are applied to the evaluation of integrity for Honouliuli Internment Camp and the U.S. Immigration Station.

Honouliuli Internment Camp

Honouliuli Internment Camp retains a high degree of integrity of location, setting, feeling, and association. World War II era features include the remains of two buildings, numerous foundations, fence remnants, artifact scatters, and other features that convey the historic significance of the site. Modern development at the site has been minimal and does not detract from the overall site integrity. In addition, Honouliuli Internment Camp retains historic features associated with design, workmanship, and materials.

Photos (top to bottom): **1.** Existing mess hall slab in internee compound, Honouliuli Internment Camp. Fifteen building foundations have been documented to date at Honouliuli. Photo: NPS, 2011. **2.** Existing viaduct over Honouliuli Stream channel, Honouliuli. Photo by Jeffery Burton, 2011.

Location

Location refers to the place where the historic property was constructed or the place where historic events occurred. Properties associated with Japanese American internment and incarceration must be located within the wartime boundaries of the United States and its possessions (NPS 2012).

Honouliuli Internment Camp is in its original *location* and the contributing resources are in their original locations, as verified by Army blueprints (See Map: Honouliuli Internment Camp—Historic Layout and Modern Features).

Setting

Setting is the physical environment of a historic property—the character of a place, its topography, vegetation, simple manmade features such as paths and fences, and the relationship between features, and open space.

For properties related to Japanese American incarceration during World War II, the setting includes the character of the places where they were developed, as well as their siting in those places. The isolated settings of the centers were highly significant in that they reveal a perceived need to remove Japanese Americans from mainstream American culture. There was also a perception that security would be easier to enforce in rural locations. In order for above ground resources at these properties to meet NHL criteria for integrity, much of the harshness and isolation of the original setting should remain (NPS 2012).

The *setting* of Honouliuli, in a hidden gulch surrounded by agricultural fields, remains virtually unchanged since World War II. Within the 122-acre site, modern intrusions are minimal and include a satellite dish site, a water treatment facility, and a paved access road.

Materials

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. For incarceration sites, most construction materials such as lumber and tarpaper no longer remain above ground. Material remains typically

Generator building foundation uncovered by JCCH volunteers in 2008, Honouliuli. Photo: Burton and Farrell 2008.

include durable materials such as concrete and stone used for building footprints, sidewalks, roads, footings, and other landscape features. The remnants of landscape materials placed by residents, including trees and other plantings, concrete garden pools, and other features, also provide a key to the appearance of a site during occupation and lend integrity to the site (NPS 2012).

Honouliuli retains integrity of *materials* in two extant buildings, in site features, and in archeological deposits. The National Register of Historic Places nomination for Honouliuli Internment Camp documents 134 features recorded during an archeological survey of the site. All but 16 were determined likely to be associated with the internment camp. The two extant buildings retain foundations, windows, doors, and siding. One building still retains a World War II-era light fixture. Numerous concrete foundations, roads, remnants of security fences, pathways lined with rock, concrete tanks, and metal and clay pipes (part of the sewage disposal system) are still present, lending to the appearance of the site during occupation (Burton and Farrell 2008 and 2011).

Design

Design is a combination of elements that create the form, plan, space, structure, and style of a property. Design includes such factors as the organization of space, proportion, scale, technology, ornamentation, and materials. Where few historic buildings survive, the ability of the property to visually convey its original planned layout may determine whether integrity of design is retained.

Generally imposed on stark landscapes, the designs of the centers were based on right-angle grids, which imbued the centers with a sense of military order. In some cases, the configuration of the grid was broken to accommodate a river, a road, or a railroad.

Any physical evidence of the site plan—above or below ground—has potential significance. Gardens, pools, and other landscape features created by the residents often embellished the stark layout. The survival of these features contributes to the design integrity of related properties. Security features also contribute to the design integrity of the site. Surviving remains of fences, watchtowers, jails, and police compounds provide important insights to the layout and feeling of a site (NPS 2012).

Photos (top to bottom): **1.** Manhole cover with Nov. 4, 1944 inscription, Honouliuli, 2006. Photo: Jeffery F. Burton, provided as part of the National Register of Historic Sites nomination form. Fifteen building foundations have been documented to date at Honouliuli. **2.** Remnant of mortared stone wall, Honouliuli Internment Camp. Photo: NPS, 2011. **3.** Remains of stone edging, Honouliuli Internment Camp. Photo: Burton and Farrell 2007.

The *design* of Honouliuli Internment Camp is apparent in the overall layout and the individual features within the site. Although some features are obscured by vegetation, the combination of remaining features including building foundations, fence and watchtower footings, rock-lined pathways, roads, and water and sewage system remains, collectively convey the military design and appearance of the camp during occupation (Burton and Farrell 2011).

Workmanship

Workmanship relates to the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory, is seen in elements in the large-scale landscape. The workmanship of extant camp buildings and structures can illustrate the military standardization of plans (or the modification of plans) and the temporary nature of the construction. Surviving buildings and those examined archeologically may show the differences between housing for staff members and housing for the prisoners.

Above and below ground archeological evidence may indicate the quality of workmanship that existed in buildings and structures that are no longer extant above ground. Workmanship can also be applied to residential landscape features, particularly those designed and built by prisoners. If sufficient integrity exists to decipher the plan or form of a landscape feature, the quality of workmanship can be assessed. Names, dates, and other expressions incised into concrete or carved or painted on wood may document builders' identities and contribute to the integrity of workmanship (NPS 2012).

Honouliuli Internment Camp was divided into seven compounds, five of which were prisoner of war compounds. The other two compounds were for administration and Japanese American internees. An archeological survey of the site documented 43 features related to the prisoner of war camps, 16 features in the administration area (including two standing structures), and 27 features related to the internees. Linear features that crossed more than one compound were also recorded. These resources illustrate military standardization of plans, as well as, differences in housing between administration, internees, and prisoners of war (Burton and Farrell 2008 and 2011).

The National Register Nomination for Honouliuli Internment Camp notes that "expedient military-style workmanship is evident in the standardized mess hall, laundry and other foundations; the standing buildings;

Inscription on the base of a former guard tower, Honouliuli Internment Camp. Photo: NPS, 2013.

the guard tower footings; and the overall layout." Although no prisoner-produced landscape elements have been documented, such features may be obscured by dense vegetation or sediment deposits. Oral histories, photographs, and historical descriptions of the camp indicate that internees planted trees, shrubs, and flower beds with rock borders (Burton and Farrell 2011).

Feeling

Feeling refers to a property's expression of the aesthetic or historic sense of a particular period of time. Because sites associated with the Japanese American wartime experience have lost many buildings and structures, feeling can be created by an intact setting or the footprints of lost buildings. The remote landscapes that characterized detention centers can also lend a sense of isolation and abandonment to these sites (NPS 2012).

Honouliuli expresses the *feeling* of the internment camp, not only with its isolated location, but also with the presence of artifacts related to prison security, such as fence posts, and the gulch itself. The bottom of Honouliuli Gulch is located six miles mauka (inland from the coast). It is bounded by steep slopes that reinforce the feeling of confinement. Oral histories from internees have documented that Honouliuli Gulch was referred to as *Jigoku-Dani*, or "hell valley," because the confining slopes caused the valley to be excessively hot. In a 2011 pilgrimage to the site, both visitors and former internees reacted to the seclusion of the site (Burton and Farrell 2011).

Rusted vehicle in the overgrown gulch, Honouliuli. Photo: Valentino Valdez.

Association

Association refers to the connection we make today between a particular place and an important historic event or person. Internment sites maintain associative integrity if sufficient evidence from the period remains (NPS 2012).

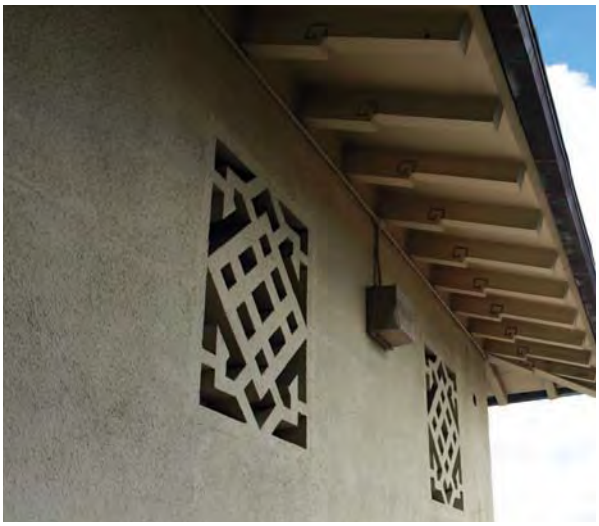
The historic site of the Honouliuli Internment Camp has integrity of *association*, as the largest and longest-lived of the Hawaiian internment sites and as a prisoner of war camp. Over 100 features remain on the original site (Burton and Farrell 2008 and 2011). Honouliuli provides a tangible link to the reach and depth of martial law in Hawai‘i, the internment of civilians, and the treatment of enemy captives. Ongoing research and the public visitation that has occurred to date indicate the site offers exceptional opportunities to understand and interpret complex aspects of America's home-front World War II history.

The U.S. Immigration Station

The U.S. Immigration Station, listed in the National Register of Historic Places, also retains a high degree of integrity of location, design, setting, workmanship, materials, feeling, and association.

Originally constructed in 1933, three of the buildings that were present on the site during World War II remain today. This includes the administration building, the detention building, and a long, one-story annex (garage/waiting shed). Japanese Americans were held in the site's courtyard and in holding cells in back of the administration building. The holding cells are still present today.

The *design* of the U.S. Immigration Station is apparent in the overall layout and the individual features within the site. The National Register of Historic Places nomination for the site recognizes that the buildings were designed to express the spirit and environment of Hawai‘i "and at the same time maintaining well balanced and well-proportioned masses, graceful lines and a pleasing color effect (National Register of Historic Places 1973)." The *setting* remains virtually unchanged since World War II. *Workmanship* is evident in the main building, including Chinese architectural details, a terra cotta portico, and a large bronze many-pointed star in the floor. The U.S. Immigration Station retains integrity of *materials* in the



Photos (top to bottom): 1. Architectural details, U.S. Immigration Station former administrative building. 2. Interior, U.S. Immigration Station former administrative building. 3. Interior, U.S. Immigration Station former administrative building. All photos: NPS, 2013.

Photos (clockwise from top left): **1.** Garage and waiting shed, U.S. Immigration Station. **2.** Interior, U.S. Immigration Station garage and waiting shed. **3.** Entry, former administration building, U.S. Immigration Station. **4.** Lounging shed, U.S. Immigration Station. All photos: NPS, 2013.

three remaining buildings and in site features such as the courtyard. The U.S. Immigration Station expresses the *feeling* of the period of internment, courtyards used during this time remain and the main building still retains holding cells that were used during this period. Finally, the U.S. Immigration Station buildings have integrity of *association*, providing a tangible link to the history of the initial detention of both immigrants and citizens during World War II. The buildings continue to be used for immigration and internal security related activities which further contributes to the site's feeling and association.

Both sites possess a high degree of integrity.

Significance of Additional Sites Associated with Civilian Internment during World War II

The other sites associated with internment considered in this study were used for shorter periods of time, interned fewer numbers of people, or have been substantially changed since the period of significance. As such, they do not meet the criteria for national significance as defined in the SRS and NHL guidelines. Many of these sites are, however, listed or eligible for listing in the National Register of Historic Places and provide opportunities to further interpret the story of internment and incarceration in the U.S. during World War II. More detailed information about each site is located in Chapter 2, Part II: Sites Associated with the Internment in Hawai'i.

The Honolulu Police Department, Yokohama Specie Bank, and Kaua'i County Courthouse are three sites associated with internment that are already listed in the National Register of Historic Places and retain high integrity. Although listed in the National Register for other associations, their relationship to World War II internment expands their significance.

Two sites appear eligible for listing in the National Register of Historic Places, the Kilauea Military Camp and the Lāna'i City Jail. Both sites possess integrity of location, setting, materials, workmanship, design, feeling, and association. Together, these five sites possess opportunities to tell multiple aspects of the story of the forcible internment of civilians during World War II.

SITES LISTED OR ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES

Association with internment enhances the significance of three buildings already listed in the National Register of Historic Places: Honolulu Police Department, Yokohama Specie Bank, and Kaua'i County Courthouse.

The National Park Service is currently preparing a National Register Nomination for the Kilauea Military Camp. The focus of the nomination is the significance of this site as a result of its association with the development of a recreation camp for military personnel on the Island of Hawai'i. The association with internment enhances this significance. Kilauea Military Camp contains the best-preserved primary internment camp structures found in the state of Hawai'i. It retains a high degree of integrity of location, design, setting, workmanship, materials, feeling, and association. The site and buildings have been preserved as part of the military and National Park Service activities within Hawai'i Volcanoes National Park, and visitation is available to the general public. The modifications of details and rearranging of functions of the buildings has been ongoing since their construction in the 1920s and reflect standard military adaptability. The location and setting are nearly unchanged from the World War II period. Original design is still evident in the layout of the buildings; integrity of workmanship and materials is manifest in the fireplace; and the association is clear. The site as a whole retains a strong integrity of feeling: former internees would have no trouble recognizing the site today.

The Lāna'i City Jail and Courthouse could be significant for their association with World War II internment. The buildings are part of an intact plantation town from the Dole Pineapple era and retain sufficient integrity for nomination to the National Register of Historic Places.

SITES NEEDING ADDITIONAL RESEARCH

In six cases, additional research is necessary to establish clear association with internment, or to determine whether the property retains sufficient integrity to convey its

significance: Waiākea Prison Camp and the Hilo Independent Japanese Language School on the the island of Hawai‘i, Līhu‘e Plantation Gymnasium and Kalāheo Stockade on Kaua‘i, and Ha‘ikū Military Camp and Maui County Courthouse and Police Station on Maui.

OTHER SITES

Six of the sites associated with the World War II internment of civilians appear to lack sufficient integrity for National Register consideration: Sand Island Detention Camp on O‘ahu, Wailua Jail and Waimea Jail on Kaua‘i, Maui County Jail on Maui, Waiākea Prison Camp on the island of Hawai‘i, and Kaunakakai Jail and Courthouse on Moloka‘i. Structures related to World War II internment have been removed from the Sand Island, Wailua, Waimea, Waiākea, and Maui County Jail sites, and because of modern disturbance there is little potential for significant archeological deposits at those sites. The Kaunakakai Jail and Courthouse, while still standing, have been moved from their World War II location, and moved properties are generally not eligible for the National Register.

National Significance Conclusion

This study concludes that the Honouliuli Internment Camp and the U.S. Immigration Station are nationally significant and meet national historic landmark and special resource study criteria.

Honouliuli Internment Camp was the last, largest, and longest-used World War II confinement site in Hawai‘i and contains archeological features and deposits that have the potential to yield important new information about the treatment of Japanese and European internees and prisoners of war. Honouliuli Internment Camp meets NHL criteria 1 and 6.

The U.S. Immigration Station complex in Honolulu is significant as the location where virtually all internees in Hawai‘i were processed or temporarily incarcerated before being transferred to internment sites on O‘ahu or mainland United States. The U.S. Immigration Station meets NHL criterion 1.

Honouliuli Internment Camp and the U.S. Immigration Station meet all four special resource study criteria. They are outstanding examples of primary sites associated with internment; they possess exceptional value in illustrating or interpreting the event; they have the potential to offer superlative opportunities for public education or for scientific study; and they retain a high degree of integrity as true, accurate, and relatively unspoiled examples of a resource.

The other 15 sites associated with internment considered in this study were used for shorter periods of time, interned fewer numbers of people, or have been substantially changed since the period of significance. As such, they do not meet the criteria for national significance as defined in the special resource study and national historic landmark criteria. Many of these sites are, however, listed or eligible for listing in the National Register of Historic Places and/or provide opportunities to further interpret the story of internment and incarceration in the U.S. during World War II.

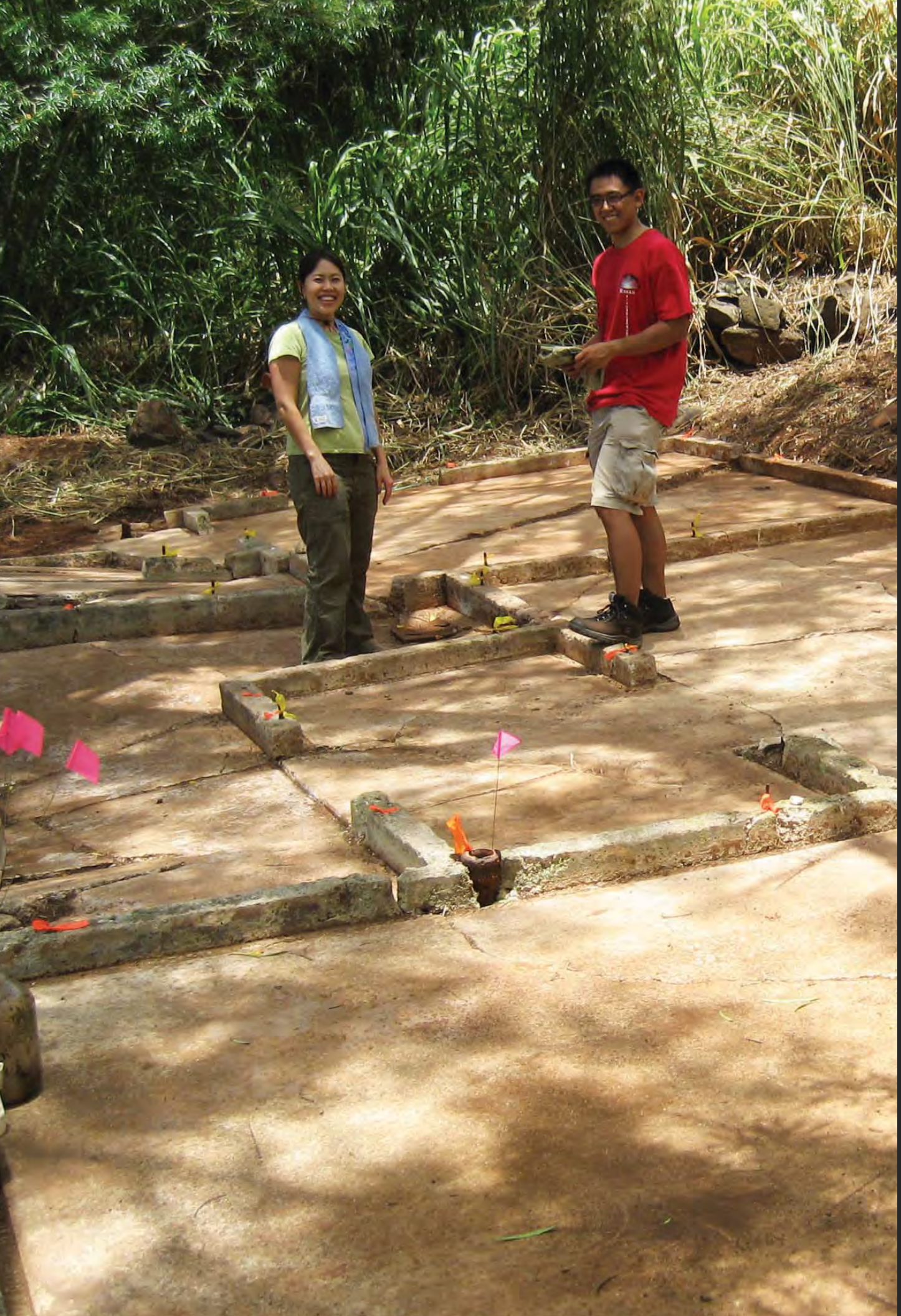
Table 3-1: Nationally Significant Sites			
Site Name	*Location*	*Integrity*	*Description*
Honouliuli Internment Camp	West of Kunia Road, Waipahu, O‘ahu	High	The largest and longest-used internment site in Hawai‘i and a prisoner of war camp as well, Honouliuli provides a tangible link to the reach and depth of martial law in Hawai‘i, the internment of civilians, and the treatment of enemy captives. Ongoing research and public visitation that has occurred to date indicate the site offers exceptional opportunities to understand and interpret complex aspects of the U.S.'s homefront World War II history. Listed in the National Register of Historic Places on February 21, 2012 for areas of significance related to Asian and European ethnic heritage, military and social history, politics, government, law, and historic archeology.
U.S. Immigration Station	595 Ala Moana Boulevard, Honolulu, O‘ahu	High	The U.S. Immigration Station is nationally significant for its role in the history of internment in Hawai‘i during World War II. Designed to welcome immigrants to Hawai‘i, the U.S. Immigration Station was also used during World War II to detain resident aliens and U.S. citizens whose race or ethnicity aroused suspicion. Further analysis of the U.S. Immigration Station's role in U.S. immigration history is recommended. Listed in the National Register of Historic Places on August 14, 1973 for its architecture, social/humanitarian contributions, and as a "Pacific Bridge."

Table 3-2: Sites Listed in the National Register of Historic Places, where Internment History Enhances or May Enhance Their Significance			
Site Name	*Location*	*Integrity*	*Description*
Honolulu Police Department	842 Bethel Street, Honolulu, Oʻahu	High	Some individuals were taken to the downtown Honolulu Police Department Headquarters or the Military Police Headquarters (formerly the Yokohama Specie Bank) before transfer to the U.S. Immigration Station. Listed as part of the Merchant Street Historic District in the National Register of Historic Places on June 19, 1973 for architecture. The relationship to World War II internment enhances the significance of the site.
Yokohama Specie Bank	36 Merchant Street, Honolulu, Oʻahu	High	The Yokohama Specie Bank was originally a bank for Japanese nationals living in Hawaiʻi. After the attack on Pearl Harbor, the building was seized by the Army and used as the military police station. It housed a jail in the basement where it is reported that Hawaiian residents of Japanese ancestry were kept prior to transfer to the U.S. Immigration Station. Listed as part of the Merchant Street Historic District in the National Register of Historic Places on June 19, 1973 for architecture.
Kauaʻi County Courthouse	4444 Rice Street, Līhuʻe, Kauaʻi	High	According to information obtained during public meetings conducted for this study, Kauaʻi internee hearings were held here. Listed as part of the Līhuʻe Civic Center Historic District in the National Register of Historic Places on December 17, 1981 for architecture. Its association with World War II internment expands its significance.

Table 3-3: Sites Associated with World War II Internment in Hawai'i Recommended for Nomination to the National Register of Historic Places			
Site Name	*Location*	*Integrity*	*Description*
Kilauea Military Camp (KMC)	Hawaiʻi Volcanoes National Park, Island of Hawaiʻi	High	Used as an internment site for individuals from the island of Hawaiʻi until mid-1942, KMC is significant as a true and relatively unspoiled example of an internment site quickly created at a military facility, itself a recreation site hastily adapted for wartime use.
Lānaʻi City Jail and Courthouse	Gay and 8th Street, Lānaʻi City, Lānaʻi	High	Two or three internees from Lānaʻi were arrested and held at the Lānaʻi City Jail. Structures remain in their original location, little modified, on Lānaʻi City's open square. The Lānaʻi City Jail and courthouse along with several other structures in the historic Lānaʻi City downtown area, were listed as one of the National Trust for Historic Preservation's 11 Most Endangered Historic Places in 2009.

Table 3-4: Sites Needing Additional Research			
Site Name	*Location*	*Integrity*	*Description*
Waiākea Prison Camp	Hilo, Island of Hawai‘i	Unknown	As a hard-labor prison camp where internees considered “troublemakers” were sent, this site could have a high level of significance for its ability to convey the reach of martial law. However, its integrity needs to be determined.
Hilo Independent Japanese Language School	Hilo, Island of Hawai‘i	Unknown	According to information obtained during public meetings conducted for this study, individuals were detained at this site pending transfer to O‘ahu. Location and integrity need to be determined.
Līhu‘e Plantation Gymnasium	Līhu‘e, Kaua‘i	Unknown	Because one internee was held in solitary confinement at this site for a month, it would be considered a secondary site associated with internment. The structure still remains at Isenberg Park. However, additional research would be necessary to determine integrity. This site may have potential for interpreting internment during World War II.
Kalāheo Stockade	Kalāheo vicinity, Kaua‘i	Unknown	With a capacity for 20 to 25 people and used for more than 6 months, this is a primary site associated with internment in Hawai‘i. However, location and integrity need to be determined.
Ha‘ikū Military Camp	Ha‘ikū, Maui	Unknown	Historic records indicate there were at least four internees at this site in September 1943, and the fact that they were present almost two years after the war started suggests Ha‘ikū may have been used to incarcerate internees for a long time. One building remains from its World War II use, but its relationship to internment is unknown. Other features of the camp have reportedly been removed.
Maui County Courthouse and Police Station	150 and 200 South High Street, Wailuku, Maui	High	Further investigation is required to determine whether the Courthouse and Police Station were associated with the World II internment. The Courthouse and the Police Station were listed as part of the Wailuku Civic Center Historic District in the National Register of Historic Places in 1986 for their architecture and for their association with the early development of Maui County.

Table 3-5: Other Sites			
Site Name	*Location*	*Integrity*	*Description*
Sand Island Detention Camp	Sand Island, Oʻahu	Lacks Integrity/ Demolished	The Sand Island Detention Camp opened on December 8, 1941 and operated for 15 months until March 1, 1943. At one point there were four separately fenced enclosures for internees, two for male Nikkei with 250 persons each, one for 40 females "of mixed races," and one for 25 male U.S. citizens and nationals of German and Italian ancestry. Most internees were sent to mainland internment camps; some were sent to Honouliuli Internment Camp once it was constructed. Today, no evidence of the internment camp remains.
Wailua County Jail	Wailua, Kauaʻi	Lacks Integrity/ Destroyed	The Wailua County Jail was the first place on Kauaʻi where internees were assembled. The number of internees held there was approximately 65. The building was destroyed by a hurricane and replaced with a modern facility of several one-story buildings, now known as the Kauaʻi Community Correctional Center. No buildings related to the internment history remain in that location.
Waimea Jail	Līhuʻe, Kauaʻi	Lacks Integrity/ Demolished	At least ten Nikkei were incarcerated at the jail, including one Nikkei woman from Niʻihau. It is believed that the jail has since been demolished. Its site is the current location of the county police and fire station in Waimea.
Kaunakakai Jail and Courthouse	Kalāheo vicinity, Kauaʻi	Moved	The few individuals of Japanese heritage from Molokaʻi were likely jailed here before being transferred to the Maui County Jail and then to Oʻahu. The Kaunakakai County Jail and courthouse are still standing but were moved offsite to a local park to make room for a new public library. Moved properties are generally not eligible for the National Register.
Maui County Jail	600 Waiale Road, Wailuku, Maui	Lacks Integrity/ Demolished	The Maui County Jail, also called the Wailuku County Jail, was used to detain individuals of Japanese descent. It was called the "Detention Camp, Wailuku." The jail was demolished in 1970.



SUITABILITY

4

Latrine and shower room foundation in the guard camp uncovered by JCCH volunteers in 2011, Honouliuli Internment Camp. Photo: Jeffery Burton.

CHAPTER 4: SUITABILITY

This section describes the National Park Service analysis of whether nationally significant sites are suitable for inclusion in the national park system.

Introduction

To be considered suitable for addition to the national park system, an area must represent a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector. Adequacy of representation is determined on a case-by-case basis by comparing the potential addition to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the proposed new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

For the purposes of this analysis only the sites found to be nationally significant in Hawai‘i (Honouliuli Internment Camp and the U.S. Immigration Station) are analyzed compared to the U.S. mainland incarceration sites. Honouliuli Internment Camp and the U.S. Immigration Station are analyzed in comparison with the history and conditions of mainland incarceration sites and other similarly themed sites throughout the United States. In addition, this chapter analyzes Honouliuli Internment Camp and the U.S. Immigration Station in the context of other national park system units and sites related to similar themes of peopling places, creating social institutions, expressing cultural values, shaping the political landscape, and the changing role of the United States in the world community.

Comparative Analysis of U.S. Mainland and Hawai‘i Incarceration Sites

This section compares the history, sites, quality and quantity, and opportunities for interpretation and education between the U.S. mainland and Hawai‘i incarceration sites during World War II. Several mainland incarceration sites are designated units of the national park system or are national historic landmarks, and this section documents the similarities and differences between these mainland sites and Honouliuli Internment Camp and the U.S. Immigration Station.

DIFFERENCES BETWEEN THE HISTORY OF THE INCARCERATION OF CIVILIANS ON THE U.S. MAINLAND AND IN HAWAI‘I

The incarceration of civilians during World War II has been determined to be a nationally significant episode in American history. In Chapter 3: Resource Significance, the section Significance of the Events: Incarceration of Civilians in the United States during World War II provides a complete description of the differences between the incarceration of civilians in Hawai‘i and on the U.S. mainland. The following description provides a summary of the key differences to set the context for the suitability analysis and determinations.

First, the legal mechanism used to authorize incarceration in Hawai‘i was martial law, as opposed to Executive Order 9066 on the mainland. Martial law was declared in the Hawaiian Islands on December 7, 1941 immediately following the attack on Pearl Harbor. Martial law gave the U.S. military jurisdiction over the islands and became the mechanism for incarcerating Japanese and European American citizens until October 24, 1944. Immediately before martial law was lifted, President Roosevelt signed Executive Order 9489, modeled after Executive 9066, that authorized Hawai‘i’s military to intern enemy aliens and expel from the islands any U.S. citizen who were considered a security threat.

Second, although the threat of sabotage, aiding and abetting, and espionage was potentially much greater in Hawai‘i than on the mainland, less than 2 percent of the Nikkei

in Hawai‘i were incarcerated as compared to the mass incarceration of all people of Japanese descent from the mainland’s West Coast. Nikkei composed 37% of Hawai‘i’s population and were well integrated into the social, political, and economic life of Hawai‘i. A mass incarceration was not only logistically impossible but also would have crippled the economy and social order of the islands. In addition, the more strategic approach to incarceration allowed Nikkei in Hawai‘i to contribute fully to the war effort in civilian roles and through the all-Nisei military units.

Third, although the more limited incarceration in Hawai‘i was less damaging to the morale of the general population, it may have had even more insidious effects on the targeted individuals. Incarceration on the mainland was psychologically and financially devastating for the entire Japanese American population. In Hawai‘i, to be designated a possible traitor and imprisoned was arguably more stigmatizing for those involved. Residents of German and Italian descent were similarly labeled and incarcerated.

Fourth, the level of public understanding and awareness about the history of incarceration of civilians during World War II is drastically different. On the mainland during World War II, the mass incarceration was well known on the West Coast because all Nikkei were excluded and confined, and the media promulgated wartime hysteria and broadcasted the many aspects and events of the mass incarceration. The mainland incarceration has also been well documented, and there is a growing level of public awareness about this history. In contrast, the incarceration in Hawai‘i was largely kept secret during World War II, and this history is only now the subject of recent scholarship and public awareness campaigns.

Japanese American heads of family and persons living alone wait outside the Civil Control Station, San Francisco, in response to Civilian Exclusion Order Number 20. Photograph by Dorothea Lange, April 25, 1942. Photo: National Archives and Records Administration.

DIFFERENCES BETWEEN THE U.S. MAINLAND AND HAWAI'I INCARCERATION SITES

The incarceration sites—their operation, physical locations, structural layout and composition, and imprisoned populations were markedly different between the mainland and Hawai'i sites.

Mainland Incarceration Sites

On the mainland, the incarceration process and sites were operated by several government departments and agencies. These included the War Department through the Western Defense Command and its Wartime Civil Control Administration; the Department of Justice and its agencies— the Federal Bureau of Investigation and Immigration and Naturalization Service; and the War Relocation Authority (WRA). The WRA was established by executive order to administer the mass incarceration of all Nikkei from the West Coast at the WRA centers. Generally, the War Department and Justice Department ran internment camps for individuals deemed enemy aliens, while the WRA operated camps for the mass incarceration of Nikkei, two-thirds of whom were American citizens.

Soon after the bombing of Pearl Harbor on December 7, 1941, thousands of West Coast Issei leaders were arrested and taken to local immigration stations. After processing, most of them were then sent to internment camps throughout the U.S. These small camps were designed for individuals who were singled out by the government as potentially dangerous, deemed disloyal, and for those requesting repatriation or expatriation to Japan. These camps included, but were not limited to, citizen isolation centers, temporary detention stations, and Department of Justice internment camps. These facilities housed mostly men and ranged in size from imprisoning fewer than a hundred individuals to a few thousand. They were generally located in remote areas and set up as prisons guarded by Border Patrol agents.

Once Executive Order 9066 was signed by President Roosevelt on February 19, 1942, all West Coast Nikkei were forcibly removed from their homes and sent to one of fifteen temporary detention facilities, called "assembly centers" run by the Wartime Civil Control Administration. These facilities were generally located in converted fairgrounds, racetracks, and exposition centers. Their function was to hold the incarcerated Japanese Americans while the more permanent WRA centers were being constructed in remote locations.

The mainland WRA centers (including Manzanar, Minidoka, and Tule Lake) were located on desolate and expansive tracts of government land. The camps were massive, covering tens of thousands of acres and composed of hundreds of barracks and temporary buildings. The camp layouts were organized into dozens of blocks of cramped communal quarters with WRA operations and staff areas separated for functionality and perceived security. Large areas of open space often surrounded the camps—these areas were used for agriculture to enable the camps to be sustainable during wartime.

The ten massive WRA camps were the temporary residences for 120,000 Japanese Americans of all ages and backgrounds, including women, children, and the elderly and infirm. In time, the incarcerated Nikkei transformed the WRA camps into largely self-sustaining communities, functioning as small towns with their own schools, places of worship, community organizations, and recreational leagues. Incarcerated Nikkei established businesses, such as general stores, banks, and barbershops. Many worked in and around the camps, whether in a professional capacity as doctors or teachers, or to support nearby agriculture or supply the military with materials for the war effort.

Many of the mainland incarceration sites have received designations as national park system units, national historic landmarks, national register of historic places properties, and state historic designations.

Units of the national park system that represent the history of incarceration on the mainland:

Manzanar National Historic Site (Independence, California)

Manzanar National Historic Site is located in the Owens Valley of eastern California and protects and interprets the historical, cultural, and natural resources associated with the mass incarceration of Japanese Americans during

World War II. Manzanar was the first camp to open and the first to be administered by the WRA. The camp held 10,046 internees for 44 months—second only to Tule Lake in the length of its occupation. Manzanar National Historic Site is considered the best preserved of the mainland incarceration camps (NPS 2012, 136).

Minidoka National Historic Site (Jerome County, Idaho)

Minidoka National Historic Site, in Jerome County, Idaho, was established to preserve the historic features and interpret the history of the former Minidoka Relocation Center, which held 13,000 Nikkei from Washington, Oregon, California, and Alaska during World War II. Located in the high desert of the Snake River Plain, it became the seventh most populous region in Idaho during World War II, due to the size of the camp. Minidoka was known for having a high number of Nisei who served in the U.S. military during the war.

Nidoto Nai Yoni Memorial (Bainbridge Island, Washington)

A satellite unit of Minidoka National Historic Site, the Nidoto Nai Yoni Memorial marks the location of the Eagledale ferry dock on Bainbridge Island. Here, on March 30, 1942, 227 residents of Japanese descent—two-thirds of them American citizens—were rounded up to board a ferry as they were forcibly removed from the island and sent to Manzanar. They were the very first Nikkei to be exiled from the West Coast; approximately one year later, the majority of these Bainbridge Island residents were transferred to Minidoka. *Nidoto Nai Yoni* means "Let It Not Happen Again."

Tule Lake Unit of WWII Valor in the Pacific National Monument (Newell, California)

The Tule Lake Unit, in rural Newell, California, preserves and interprets the history and setting of the incarceration and later segregation of Nikkei at Tule Lake during World War II. Tule

This photograph of Manzanar, taken by Ansel Adams in 1943, illustrates the exposed, remote conditions of the majority of mainland incarceration sites. Photo: Library of Congress.

Photographs of Tule Lake reveal key differences between Hawaiian and mainland incarceration sites. **Above:** Internees contribute to a large-scale agricultural operation typical of mainland sites. **Below:** Women pose outside a barber shop at Tule Lake. Mainland WRA camps were often self-sustaining communities, where incarcerees developed their own businesses, civic organizations, and recreational leagues. Both photos c. 1942–43, Library of Congress.

Lake was the largest of the ten WRA camps, incarcerating approximately 29,000 people over the duration of the war. It was also the longest in operation, closing in March 1946. In 1943, the government administered an ill-conceived "loyalty" questionnaire to distinguish "loyals" from "disloyals." Those who answered "no," refused to answer, or gave qualified answers were deemed "disloyal." In summer 1943, the camp was converted to the segregation center. "Loyals" at Tule Lake were given the option to move to another camp, while simultaneously, all "disloyals" from the other camps were transferred to Tule Lake. The level of security intensified, culminating in November 1943 when the camp was placed under martial law, surrounded by tanks and cavalry. Tule Lake may be the best example of what President Roosevelt called concentration camps in the United States during World War II.

Ten miles from the segregation center is Camp Tulelake—one of three areas that compose the Tule Lake Unit in northern California. While the Tule Lake Unit's most recognized history is related to the mass incarceration of Nikkei during World War II, Camp Tulelake also played a significant role in incarcerating Nikkei as well as prisoners of war.

National Historic Landmarks that represent the history of incarceration on the mainland:

Rohwer Relocation Center Memorial Cemetery (Desha County, Arkansas)

Located 5 miles west of the Mississippi River in southeastern Arkansas, the Rohwer Relocation Center operated between September 1942 and November 1945, holding a maximum population of 8,475. The site differs from many of the other camps in its riparian setting, once forested and now primarily devoted to crops and housing. Though few visible remnants of the camp exist today, the cemetery is one of only three remaining incarceration camp cemeteries.

Granada Relocation Center (Prowers County, Colorado)

Sited on an exposed prairie in southeastern Colorado, the Granada Relocation Center was also called Amache. The smallest of the WRA centers, Granada held 7,597 people at its peak in October 1942. Most Nikkei came from

Photos (top to bottom): **1.** Remnants of a storage building for the camp cooperative store, Granada Relocation Center. Photo: Nathan W. Armes, Armes Photography. **2.** The Rohwer Relocation Center Memorial Cemetery. Photo: Arkansas State University.

agricultural areas in California's central valleys, and Granada was notable for its significant agricultural production. Almost all of the building foundations, roads, and landscaping survive, and the archeological resources are among the most intact of all of the WRA camps.

Heart Mountain Relocation Center (Park County, Wyoming)

The Heart Mountain Relocation Center was built 12 miles northeast of Cody in northwestern Wyoming, on land previously managed by the Bureau of Reclamation. At its peak in January 1943 it held 10,767 inhabitants. When the draft was re-opened to Japanese Americans, Heart Mountain experienced the highest rate of draft resistance among the ten camps. Eighty-five men were imprisoned for resisting the draft and protesting the confinement of Japanese American citizens.

Central Utah Relocation Center/Topaz (Millard County, Utah)

Set in the high desert of west central Utah, the camp was also called the Topaz Relocation Center, for its view of Topaz Mountain. Unlike some other states, Utah welcomed the presence of Nikkei because it viewed the camps as a source of much-needed agricultural labor during wartime shortages. The population (8,130 at its maximum) produced much of its own food, despite punishing climatic conditions. No buildings remain in the central area, however many foundations, roads, and pathways are still intact.

Poston Elementary School, Unit 1, Colorado River Relocation Center (La Paz County, Arizona)

The Colorado River Relocation Center, also called the Poston Relocation Center, was the second camp to open, in May 1942. It was also the second largest camp with a peak occupancy of 17,814. Built on tribal land on the Colorado River Reservation, it held a unique position in the system due to its administration by the Office of Indian Affairs during 1942 and 1943. The center was constructed despite the objections of the Tribal Council of the Colorado River Indian Tribes, and it included three units, each separated by 3 miles. The Poston Elementary School was designed by Japanese American architect Yoshisaku Hirose

Photos (top to bottom): **1.** The Heart Mountain Interpretive Center commemorates the incarceration of more than 14,000 Japanese Americans. Photo: Stevan Leger, Heart Mountain, Wyoming Foundation. **2.** The site of the Central Utah Relocation Center today. Photo: Thomas H. Simmons, Front Range Research Associates, Inc. **3.** Remains of the Unit 1 Auditorium Building, Poston Elementary School, Colorado River Relocation Center. Photo: Thomas H. Simmons, Front Range Research Associates, Inc.

and built by incarcerees. It is the only standing elementary school within a former incarceration camp.

Other designated sites that represent the history of incarceration on the mainland:

Appendix D: Japanese American Wartime Incarceration Properties provides the names of properties, their locations, and status of federal and state designations of all known incarceration sites. This table was adapted from the *Japanese Americans in World War II Theme Study*.

Honouliuli Internment Camp

In contrast to the designated mainland incarceration sites, Honouliuli Internment Camp was run by the U.S. military. The Honouliuli Internment Camp was much smaller than the massive WRA centers. At Honouliuli, the approximate maximum occupancy was 4,000 prisoners.

Arguably more akin to the WRA and DOJ's smaller incarceration and internment camps on the mainland, Honouliuli Camp also had one remarkable difference. Honouliuli Camp was both an internment camp and a prisoner of war camp, suggesting that the military—at least in some respects—viewed enemy soldiers and civilian detainees in a similar light. As the war progressed and with U.S. forces advancing toward Japan, the number of POWs increased at Honouliuli, ultimately totaling approximately 4,000 POWs from Korea, Okinawa, Taiwan, Japan, and Italy. Simultaneously, the number of incarcerated civilians decreased, as these individuals were transferred to the mainland WRA and DOJ camps or paroled. The size of the imprisoned population at Honouliuli changed frequently, with the size of the camp increasing as the need arose.

Rather than the remote locations and vast landscapes that characterized the majority of the incarceration sites on the mainland, Honouliuli was situated just a few miles from the largest population center (Honolulu) in the Pacific. It was isolated at the bottom of a deep gulch that trapped heat and moisture and bred mosquitoes. Because of these qualities, the internees called it *jigoku dani*, or "hell valley." The prisoners were effectively hidden

Aqueduct leading through the prisoner of war area, Honouliuli Internment Camp, Honouliuli Day of Remembrance, February 27, 2011. Photo: NPS.

from view, and the segregation imposed by the landform only reinforced the inhabitants' sense of imprisonment.

The differing and variable population influenced Honouliuli's physical and social organization: it was divided into compounds separating prisoners of war from civilian internees. Inmates were housed in barracks and tents spread along the Honouliuli Stream's basin. At Honouliuli, the sole compound dedicated to civilian internees was located in the middle of a long, narrow valley. Four POW compounds were located to the north, and a fifth POW compound plus the guard camp area was located to the south. The population at Honouliuli was predominantly male and housed in groups of 11 or 12 (Burton and Farrell 2011, 10), unlike barracks in mainland camps that typically held several families each in one room.

Honouliuli functioned as a temporary prison mostly relying on materials and goods brought in from the outside. In contrast, the WRA intended for the mainland centers to be self-sufficient with vast agricultural lands, chicken and hog farms, and internal businesses, schools, and activities. While the internees at Honouliuli occasionally cultivated vegetables and reportedly improved the site with the introduction of trees, shrubs, and flower beds with rock borders (Burton and Farrell 2011, 6), the large-scale agricultural production that took place on lands surrounding mainland WRA centers would not have been possible. Honouliuli Internment Camp was therefore much less self-sufficient and never intended to function as an independent unit.

Honouliuli's unique and intact landscape setting, as well as the camp composition and circumstances of incarceration, represent a distinct, often overlooked aspect of the story of civilian incarceration in the U.S. during World War II. In particular, the camp's importance as the largest detention site for prisoners of war in Hawai'i sets it apart from the civilian WRA centers on the mainland.

Of the mainland sites within the national park system, Camp Tulelake of the Tule Lake Unit of World War II Valor in the Pacific National Monument is most comparable to Honouliuli Internment Camp. Similarities include its isolated location and the fact that both civilians and prisoners of war were incarcerated at these camps.

There are also several differences, however, the greatest being the historical differences listed above (legal mechanisms justifying the incarceration, number of those incarcerated overall, and personal and social impacts resulting from the incarceration). Other differences include:

A 1940 photographof Camp Tulelake, looking northeast, when the camp was being used by the Civilian Conservation Corps. Photo: National Archives and Records Administration.

- Camp Tulelake was constructed in the 1930s for Civilian Conservation Corps purposes. It was later converted to an incarceration site during World War II to imprison first Japanese Americans and then German and Italian prisoners of war. Honouliuli Internment Camp was constructed during World War II for the express purpose of serving as an internment camp.
- During World War II, Camp Tulelake was sited in a remote, arid landscape and included two dozen wooden buildings on 66 acres. Honouliuli was substantially larger (160 acres), more developed, and significantly more fortified. It was set within a deep gulch, hidden from view, with 175 buildings, 14 guard towers, and over 400 tents.
- The population at Camp Tulelake changed three times, with groups never overlapping in their occupancy. First, 100 men who refused to answer the "loyalty" questionnaire were incarcerated there before being returned to the Tule Lake Segregation Center or moved to DOJ camps. The second population included 243 Nikkei from other WRA centers who came to Tule Lake as strikebreakers and were employed to harvest crops. The third group included approximately 800 prisoners of war of German and Italian ancestry. In contrast, Honouliuli's population transitioned from serving as an internment camp for civilians, predominantly of Japanese heritage, to a prisoner of war camp for soldiers and conscripts from Korea, Okinawa, Taiwan, Japan and Italy. These overlapping groups were all housed at Honouliuli but were segregated into different compounds. The POW population at Honouliuli was also significantly larger, totaling nearly 4,000 individuals.
- The POWs at Camp Tulelake worked to improve the camp and then provided critical agricultural labor to neighboring onion and potato farmers. Following World War II, several of the German POWs stayed in the local area, integrating into the rural agricultural community. The POWs at Honouliuli were isolated from Hawai'i's population and returned to their homelands following the war.

While similarities exist between Camp Tulelake and Honouliuli, the many differences are essential to understanding the national significance and suitability of the Honouliuli Internment Camp in the context of U.S. mainland incarceration sites.

U.S. Immigration Station, Honolulu

The role of the U.S. Immigration Station in Hawai'i's World War II incarceration history is entirely different than both the mainland WRA and DOJ facilities and the Honouliuli Internment Camp. The U.S. Immigration Station was not a "camp" built to imprison individuals for large stretches of time. Rather it was an existing facility and detention site where prisoners were held, interrogated, and tried in hearings run by the U.S. military before being released or sent to Sand Island, Honouliuli Internment Camp, or the mainland incarceration sites.

Honolulu's U.S. Immigration Station played a similar but different role to U.S. immigration stations along the West Coast during World War II. The mainland stations, such as the U.S. Immigration Station at Angel Island in the San Francisco Bay (a National Historic Landmark and part of Angel Island State Park) and the U.S. Immigration Station at Ellis Island in New York (part of the Statue of Liberty National Monument) functioned as prisons in the months following Pearl Harbor where individuals deemed a threat to national security were temporarily imprisoned. In contrast, the Honolulu U.S. Immigration Station played a more central role in the incarceration history of Hawai'i, being used continuously throughout World War II to imprison and try citizens and foreign nationals in military run courts. It served as a holding and hearing center for all civilians arrested on O'ahu and for every resident arrested in the Hawaiian Islands and transferred to Honolulu. The U.S. Immigration Station was a transfer point for internees before being sent to other incarceration sites in Hawai'i or shipped to the mainland, and as a point of reentry, where internees were required to complete compulsory paperwork before release.

In addition, the U.S. Immigration Station in Honolulu served as a primary portal for immigrants entering the United States from Asia and the Pacific throughout its history and assisted in shaping the rich multicultural

identity of Hawai‘i. An examination of the U.S. Immigration Station’s role in the immigration history of Hawai‘i and the U.S. is needed to determine its national significance related to this theme.

National park system units and National Historic Landmarks that represent the dual history of incarceration and immigration on the mainland:

Angel Island Immigration Station (San Francisco Bay, California)

Known as the “Ellis Island of the West,” the immigration station at Angel Island processed one million immigrants between 1910 and 1940, the majority of whom came from China and Japan. The Angel Island Immigration Station enforced the Chinese Exclusion Acts of the late 19th and early 20th centuries, as well as the Immigration Act of 1924, all of which restricted the number of Asian immigrants who could enter the United States. During World War II, Angel Island Immigration Station was used as a temporary prison and transfer point for internees and POWs of Japanese, German, and Italian ancestry. All internees who were transferred to the mainland from Hawai‘i were interned at Angel Island before being sent to WRA and DOJ camps.

Ellis Island, Statue of Liberty National Monument (New York, New York)

From 1892 to 1924, Ellis Island was America’s largest and most active immigration station, where over 12 million immigrants were processed. For the vast majority of immigrants, Ellis Island truly was an “Island of Hope”—the first stop on their way to new opportunities and experiences in America. For the rest, it became the “Island of Tears”—a place where families were separated and individuals were denied entry into this country. During World War II, Ellis Island was used for the detention of Japanese, German, and Italians deemed enemy aliens from the East Coast, and it became a transfer point between incarceration camps. At its peak in December 1941, it likely held over 600 people of Japanese, German, and Italian ancestry.

Photos (top to bottom): **1.** The U.S. Immigration Station at Angel Island served as a temporary detention center for internees and POWs during World War II. From 1910–40, harsh and restrictive immigration policies intended to exclude Asians resulted in the long-term detention of many potential immigrants here. Photo: Roger Wagner. **2.** Young visitors to the U.S. Immigration Station, Angel Island, stand in front of poetry carved into walls by detainees. Photo: Brian Turner, National Trust for Historic Preservation. **3.** Closer view of carved poetry, U.S. Immigration Station, Angel Island.Photo: Jacquie Klose.

COMPARISON OF QUALITY AND QUANTITY

A comparative analysis of resource quality and quantity is required to determine the suitability of a potential addition to the national park system.

When evaluated against mainland incarceration sites, Honouliuli Camp and the U.S. Immigration Station possess a distinct quality and increased quantity of resource values. Honouliuli contains a large number of extant components, including building foundations, circulation routes, water and wastewater infrastructure, and retaining walls (Burton and Farrell 2007, 16, 73) in comparison with many of the mainland incarceration sites. These remnants, as well as archeological resources, have been protected by the site's natural isolation and are currently overgrown with a thick layer of largely invasive plant material. Besides this overgrowth, the site of the camp has remained "virtually unchanged since World War II" (Burton and Farrell 2011, 35). Further archeological research may yield additional resources. Moreover, Honouliuli is remarkably well-preserved when compared to mainland POW camps, most of which have been substantially altered by modern developments (Burton and Farrell 2011, 35).

The U.S. Immigration Station is exceptionally well-preserved and looks much as it did during World War II. The fountain constructed by Alfredo Guisti, and the holding cells and courtyard where civilian Japanese and Europeans were held are still extant. The intact historic buildings at the Honolulu U.S. Immigration Station are comparable to the quality and quantity of resources at Angel Island and Ellis Island.

OPPORTUNITIES FOR INTERPRETATION AND EDUCATION

The proximity of internment sites on O'ahu to significant World War II-related resources, especially World II Valor in the Pacific National Monument, offers an exceptional opportunity to interpret Hawai'i's incarceration history within the broader context of World War II. Honouliuli Internment Camp and the U.S. Immigration Station are located within a 10-mile radius of the Pearl Harbor Visitor Center, part of World War II Valor in the Pacific National Monument. Japanese American history during World War II is further supported by the nearby Japanese Cultural Center of Hawai'i, the U.S. Army Museum, and the Brothers in Valor Memorial in Waikiki, which commemorates Japanese Americans who served in the armed forces during the war.

This concentration of related resources is a tangible representation of the impact of the war at island, national, and international scales. The experience of the war on O'ahu was unlike anywhere else in the United States, and to date the full breadth of this history has received little interpretation. Educational programs that engage both the story of Pearl Harbor and its aftermath—as manifested by the U.S. Immigration Station and Honouliuli Internment Camp—would allow for a more comprehensive and complex portrait of the island's strategic importance in the war and its impact on civil liberties and military and civilian life.

Photos (top to bottom): **1.** Dr. Suzanne Falgout, anthropologist at the University of Hawai'i–West O'ahu, leads a multidisciplinary research and education project at Honouliuli. Photo: Valentino Valdez. **2.** Honouliuli Day of Remembrance, 2011. Photo: NPS.

A comparison of the U.S. Immigration Station alone to interpretive and educational opportunities at Angel Island and Ellis Island yields different findings. Both Angel Island and Ellis Island have been preserved for their national significance associated with U.S. immigration, contain authentic historic buildings and features, and are managed as historic sites. Both Angel Island and Ellis Island have interpretive staff and offer a wide variety of interpretive and educational information through various media (exhibits, websites, tours, etc.). Visitors come to Angel Island and Ellis Island to learn about the sites' stories. In 2012, Ellis Island received 1.89 million visitors, and approximately 200,000 people visit Angel Island. In contrast, Honolulu's U.S. Immigration Station is still in use today by the Department of Homeland Security. There are limited opportunities for onsite interpretation and education because of its use as an active immigration station.

NPS Thematic Framework—Cultural Themes

In evaluating the suitability of cultural resources within or outside the national park system, the NPS uses its "thematic framework" for history and prehistory. The framework is an outline of major themes and concepts that help us to conceptualize American history. It is used to help identify cultural resources that embody America's past and to describe and analyze the multiple layers of history encapsulated within each resource.

The framework draws upon the work of scholars across disciplines to provide a structure for capturing the complexity and meaning of human experience and for understanding that past in coherent, integrated ways. Through eight concepts that encompass the multi-faceted and interrelated nature of human experience, the thematic framework reflects a more interdisciplinary, less compartmentalized approach to American history. Five of the eight concepts apply to the civilian incarceration at Honouliuli Camp and the U.S. Immigration Station, as well as to the mainland incarceration sites described above. These five concepts are:

- Peopling Places
- Creating Social Institutions and Movements
- Expressing Cultural Values
- Shaping the Political Landscape
- The Changing Role of the United States in the World Community

Each of the concepts identified rest on a framework of topical sub-themes that are used to describe and explain the significance of the primary theme.

Each of the concepts is described along with how Honouliuli Internment Camp and the U.S. Immigration Station are relevant to the theme. Similar national park system units and national historic landmarks are described as comparisons. The sites selected as comparisons are drawn from historic sites with themes related to World War II, Asian American and Pacific Islander history, places of forced confinement, and cultural resilience in the face of discrimination. In addition, the comparable sites may be nationally significant related to other concepts described in this section. The five concepts also apply to the mainland incarceration sites, though they are not repeated below for the purposes of reducing repetition.

PEOPLING PLACES

This theme examines human population movement and change through prehistoric and historic times. It also looks at family formation; at different concepts of gender, family, and sexual division of labor; and at how they have been expressed in the American past. While patterns of daily life—birth, marriage, childrearing—are often taken for granted, they have a profound influence on public life.

Life in America began with migrations many thousands of years ago. Centuries of migrations and encounters have resulted in diverse forms of individual and group interaction, from peaceful accommodation to warfare and extermination through exposure to new diseases. Communities, too, have evolved according to cultural norms, historical circumstances, and environmental contingencies. The nature of communities is varied, dynamic, and complex. Distinctive and important regional patterns join together to create microcosms of America's history and to form the "national experience."

Topics that help define this theme include family and the life cycle; health, nutrition, and disease; migration from outside and within; community and neighborhood; ethnic homelands; and encounters, conflicts, and colonization.

For the purposes of this study, the topics of 1) migration from outside and within and 2) encounters, conflict, and colonization are most appropriate to the stories of internment in Hawai‘i.

Relevance of the Theme to the Sites

Honouliuli Camp illustrates that population movement can occur both through voluntary immigration and forced migration. The social and cultural networks established by immigrants to Hawai‘i were adversely impacted by the incarceration of community leaders: for those interned, these stable communities gave way to temporary settlements in the camp, where imprisonment severely disrupted accepted social and cultural structures. Likewise, prisoners of war from Korea, Okinawa, Taiwan, Japan, and Italy were forcibly moved to the camp and experienced it only a short time before they were transferred again to POW camps on the mainland.

The U.S. Immigration Station in Honolulu is a testament to the experience of immigration and the U.S. government's treatment of immigrants in times of peace and conflict. The station played a direct role in welcoming immigrants to the United States, while its wartime use as a temporary detention center and point of transfer for internees illustrates the ambivalent relationship that existed between Hawai‘i's government and immigrant communities.

Many of the comparably managed sites that are most relevant to Honouliuli and the U.S. Immigration Station and that reflect the theme of Peopling Places are concentrated on the West Coast and reflect America's diverse cultures, specifically Asian American heritage.

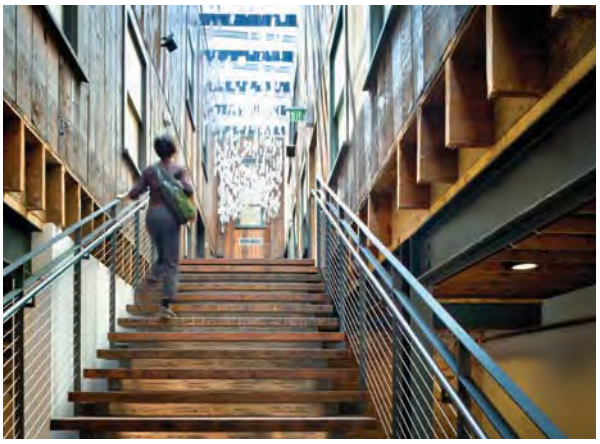
Units of the national park system that reflect the theme of Peopling Places:

Wing Luke Museum of the Asian Pacific American Experience NPS Affiliated Area (Seattle, Washington)

Founded in 1967, the Wing Luke Museum is located in Seattle's Chinatown-International District, a National Register-listed historic district. It offers a uniquely American story of Asian Pacific people and how they came to thrive in the United States, illustrating how initially temporary immigrant settlements were made permanent through the creation of community and the nurturing of social and cultural values.

Kalaupapa National Historical Park (Moloka‘i, Hawai‘i)

Kalaupapa National Historical Park honors the mo‘olelo (story) of individuals with Hansen's disease (leprosy) who were forcibly exiled to a remote peninsula between 1866 and 1969.



Photos (top to bottom): **1.** Wing Luke Museum, Seattle. Olson Kundig Architects. **2.** The installation *Letter Cloud,* in the Wing Luke Museum, evokes the experience of Asian Pacific emigrants to the United States and shares hundreds of individual stories about building a life in a new country, far from loved ones. Created by artists Erin Shie Palmer and Susie Kozawa, the exhibit suspends reproductions of letters home, handwritten by immigrants. Photos © Lara Swimmer / www.swimmerphoto.com.

Kalaupapa, once a community in isolation, now serves as a place for education and contemplation, where past suffering has given way to personal pride about accomplishments made in the face of great adversity.

National Historic Landmarks and National Register Districts that reflect the theme of Peopling Places:

Auburn–Chinese Section (Auburn, California)

This site was home to Chinese laborers working on the transcontinental railroad in the 1850s and contains buildings associated with the Chinese community. The Auburn Chinese Section is listed on the Historic American Buildings Survey.

CREATING SOCIAL INSTITUTIONS AND MOVEMENTS

This theme focuses on the diverse formal and informal structures such as schools or voluntary associations through which people express values and live their lives. Americans generate temporary movements and create enduring institutions in order to define, sustain, or reform these values. Why people organize to transform their institutions is as important to understand as how they choose to do so. Thus, both the diverse motivations people act on and the strategies they employ are critical concerns of social history. This category also encompasses temporary movements that influenced American history but did not produce permanent institutions.

Topics that help define this theme include clubs and organizations, reform movements, religious institutions, and recreational activities.

Topics relevant to this study are 1) clubs and organizations, 2) reform movements, and 3) recreational activities.

Relevance of the Theme to the Sites

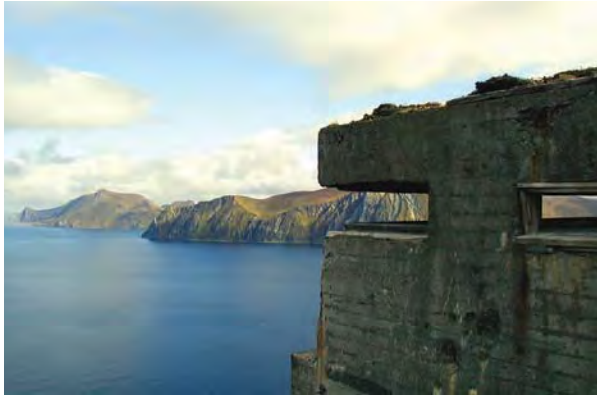
Honouliuli Internment Camp was a government-created and -forced social institution that incarcerated many prominent leaders in the Japanese American community. These individuals had worked to create organizations to uphold Japanese cultural values, and their internment disrupted both the social configuration of the community and its value systems. Though Honouliuli did not possess the social and recreational institutions that existed in mainland sites, internees arranged athletic activities in a designated field to help alleviate the tedium and discomfort of life in the camp (Territory of Hawaii n.d., 2). Also, while at Sand Island, detainees organized their own evening entertainment, known as the "Blackout Show" (Sugita 1978, 2); similar internee-created programs may also have occurred at Honouliuli Camp. These actions represent an attempt to transform a government-imposed institution and illustrate the perseverance of internees in the face of adversity. Today the site strengthens Japanese cultural values and reaffirms constitutional values through pilgrimages, days of remembrance, and educational programs that acknowledge government wrongdoing.

Like Honouliuli, the U.S. Immigration Station in Honolulu was purposefully used to break down Japanese American cultural and social institutions by removing their leaders. Individuals who were arrested, questioned, and detained at the station suffered the stigma of having been singled out as potentially disloyal. Furthermore, their forced absence created a leadership vacuum in their home communities, resulting in long-term adverse effects.

Units of the national park system that reflect the theme of Creating Social Institutions and Movements:

Aleutian World War II National Historic Area (Amaknak Island, Alaska)

This National Historic Area preserves and interprets the deadly Aleutian Campaign of World War II, including the forced removal of Unangan (Aleut people) from nine villages in the Aleutian Islands. In 1942, in the face of increased Japanese aggression in the islands, the U.S. government uprooted and sent 881 Unangan to squalid camps in Southeast Alaska, where 74 people died. Despite the horrors of this experience, the Unangan sought jobs in nearby towns, built new living quarters, and even erected a makeshift church to replace the church that had been destroyed during the evacuation.



Photos (top to bottom): **1.** One of the few remaining U.S. Army defense structures in the Aleutian World War II National Historic Area, Amaknak Island, Alaska. Photo: David Wessel, Principal, Architectural Resources Group. **2.** The church in the Aleutian village Kashega in 1938, photographed by Alan G. May during a Smithsonian Institution Archeological Expedition to the Aleutian Islands. It was never permanently resettled after the villagers were removed in 1942.Photo: Alan G. May papers, University of Alaska Anchorage. **3.** Unangan children forcibly removed from their homes and relocated to Southeast Alaska. Photo: George Dale, 1942, Alaska State Library.

Nez Perce National Historical Park (Idaho, Montana, Oregon, and Washington)

The park's 38 sites, spreading across Idaho, Washington, Oregon, and Montana, commemorate the Nez Perce, who developed a distinct culture through more than 11,000 years of interaction with the environment and landscape of their traditional homeland. The park includes the Nez Perce National Historic Trail, which preserves the route followed by the Nez Perce tribe when they were forced from their homelands by the U.S. Army in 1877.

National Historic Landmarks and National Register Districts that reflect the theme of Creating Social Institutions and Movements:

Dancing Rabbit Creek Treaty Site (Noxubee County, Mississippi)

On September 27, 1830, the Choctaw tribe signed a forced treaty at this gathering place. The treaty gave up all claims to land east of the Mississippi River and ultimately led to the tribe's removal. The treaty later served as a model for similar pacts of removal for the Chickasaw, Cherokee, Creek, and Seminole nations.

EXPRESSING CULTURAL VALUES

This theme covers expressions of culture—people's beliefs about themselves and the world they inhabit. For example, Boston African American Historic Site reflects the role of ordinary Americans and the diversity of the American cultural landscape. This theme also encompasses the ways that people communicate their moral and aesthetic values.

Topics that help define this theme include educational and intellectual currents; visual and performing arts; literature; mass media; architecture, landscape architecture, and urban design; and popular and traditional culture.

For the purposes of this study, the topics of 1) visual and performing arts; 2) literature; 3) architecture, landscape architecture, and urban design; and 4) popular and traditional culture are most appropriate to the stories of internment in Hawai'i.

Relevance of the Theme to the Sites

The World War II incarceration sites in Hawai'i reflect the persistence of Japanese cultural ideals—including honor and perseverance—when faced with the loss and debasement of cultural identity in wartime. The effort of some internees to appeal their incarceration using legal channels also represents cultural values, such as perseverance and belief in the government and in the U.S. Constitution.

The art, poetry, and landscapes created by internees at Honouliuli Camp are a tangible expression of the experience of incarceration and reflect the cultural values of Japanese Americans and European Americans. According to the Swedish Vice-consul's reports in 1943, detainees improved the conditions of the camp by "planting. . .trees and shrubs, arranging flower beds with rock borders and otherwise embellishing their surroundings with the materials at hand" (Burton and Farrell 2011, 6). Artists, such as Dan Toru Nishikawa, filled notebooks with drawings, and other internees composed poetry as a means both of passing time and documenting their experience. These first-hand expressions reveal detainees' personal responses to the internment and convey a sense of day-to-day life in the camp.

The design of the U.S. Immigration Station illustrates its role as a gateway to the United States and articulates Hawai'i's identity as a geographic and cultural crossroads. Extant features such as the courtyard fountain, created by an Italian prisoner of war, reflect the persistence of cultural expression in the face of incarceration.

Units of the national park system that reflect the theme of Expressing Cultural Values:

Cane River Creole National Historical Park (Natchitoches Parish, Louisiana)

The nearly three-hundred-year relationship between the Cane River Creoles and their homeland was shaped by the river. This relationship was tested by flood, drought, war, and numerous other obstacles, but through resilience and resourcefulness, the Creole culture was able to endure and thrive. This park is part of the 40,000-acre Cane River National Heritage Area and demonstrates the history of colonization, frontier influences, French Creole architecture and culture, cotton agriculture, slavery, and social practices over almost three centuries.

Nicodemus National Historic Site (Graham County, Kansas)

Established by African Americans during the Reconstruction Period following the Civil War, the town of Nicodemus is symbolic of the pioneer spirit of people formerly enslaved, who dared to leave the only region they had been familiar with to seek personal freedom and the opportunity to develop their talents and capabilities. Nicodemus National Historic Site is composed of five discontiguous properties containing some of the oldest surviving structures within the townsite: it is the oldest and only remaining Black settlement west of the Mississippi River.

Photos (top to bottom): **1.** The history of Prud'homme's Store, in Cane River Creole National Historical Park, exemplifies the social and cultural significance of the local store to communities in the South in the late 19th and early 20th centuries. Photo: Kevin Stewart. **2** Extant school building at Nicodemus National Historic Site, Kansas. Photo: Will Pope, NPS.

National Historic Landmarks and National Register Districts that reflect the theme of Expressing Cultural Values:

Panama Hotel (Seattle, Washington)

Designed by Japanese American architect Sabro Ozasa and built in 1910, the Panama was a working-class hotel that served generations of Japanese immigrants and international travelers. Located in the heart of Seattle's *Nihonmachi*, or Japantown, the basement of the building includes the best surviving example of an urban Japanese-style bath house, or *sento*. Found in virtually every Nihonmachi, sentos provided a cultural connection with a 1,200-year-old tradition, remade in an urban American setting. The hotel stored the belongings of many community members who were interned in WRA camps. The majority never returned for their possessions, and many of these trunks remain to this day.

Kam Wah Chung Company Building (John Day, Oregon)

The Kam Wah Chung Company Building is the best known example of a Chinese mercantile and herb store in the United States, representing the Chinese role in the post-Civil War expansion period of the American West. It is significant for its association with Chinese immigrants in the development of the American West.

SHAPING THE POLITICAL LANDSCAPE

This theme encompasses tribal, local, state, and federal political and governmental institutions that create public policy and those groups that seek to shape both policies and institutions. Sites associated with political leaders, theorists, organizations, movements, campaigns, and grassroots political activities all illustrate aspects of the political environment.

Topics that help define this theme include parties, protests, and movements; governmental institutions; military institutions and activities; and political ideas, cultures, and theories.

The sub-themes that are most relevant to the history of incarceration in Hawai'i are 1) governmental institutions; 2) military institutions and activities; and 3) political ideas, cultures, and theories.

The Kam Wah Chung Company Building was the social, cultural, and commercial hub of the once-thriving Chinese immigrant community in John Day, Oregon. Photo: Mitch Darby / www.obsidianarchitecture.com.

Relevance of the Theme to the Sites

Honouliuli Camp illustrates the impacts of enacting martial law on American soil during WWII, in particular the authorization of the internment of residents of Japanese, German, and Italian ancestry. Legal rulings associated with martial law and internment shaped the subsequent political landscape: for example, the U.S. Supreme Court in *Duncan v. Kahanamoku* decided that military tribunal jurisdiction over civilian criminal cases was unconstitutional, a ruling that established a significant legal precedent for the protection of civil liberties in times of war.

In addition to its direct role in shaping the ethnic, cultural, and political composition of Hawai'i, the U.S. Immigration Station was the site of all hearings for those arrested on O'ahu and possibly for all Hawaiian residents. It also served as a holding center; the point of

departure for internees who were transferred to Sand Island, Honouliuli, and the mainland; and the point of reentry.

Recognition of the injustice of the internment has also shaped the political landscape of the United States: remembering and sharing the stories of the incarceration acknowledges the fragility of constitutional rights and reasserts the importance of our civil liberties.

Units of the national park system that reflect the theme of Shaping the Political Landscape:

Andersonville National Historic Site (Andersonville, Georgia)

The Camp Sumter military prison at Andersonville was one of the largest Confederate prisoner of war camps during the Civil War. During the 14 months the prison existed, more than 45,000 Union soldiers were confined here. Of these, almost 13,000 died. Today, Andersonville National Historic Site is a memorial to all American prisoners of war throughout the nation's history.

Golden Gate National Recreation Area (San Francisco, California)

Buildings 35 and 640 in the Presidio of San Francisco within the Golden Gate National Recreation Area played an important role related to the incarceration of Japanese Americans during World War II. The Military Intelligence Service Language School began classes in Building 640 on November 1, 1941 before the attack on Pearl Harbor. The language school's 60 students were predominantly Japanese Americans who would later be responsible for translating enemy documents and interrogating Japanese soldiers in the Pacific. The school was moved to Camp Savage in Minnesota in 1942. Lieutenant General John L. DeWitt, commander of the Western Defense Command and the U.S. 4th Army, issued the public proclamations and civilian exclusion orders that implemented Executive Order 9066 from Building 35.

Rosie the Riveter / World War II Home Front National Historical Park (Richmond, California)

This park commemorates the efforts and sacrifices of American civilians on the World War II home front, an unprecedented scale of nationwide activity that resulted in profound changes to the country and its citizens. Women's roles were forever changed, minorities "cracked open" the door to equal rights, and employer-sponsored health care programs began to evolve. The country itself began to develop a more cohesive identity, as citizens migrated to new areas and intermingled with others from around the nation. Shipyards, day care centers, the first managed-health-care-hospital, war worker housing, and a liberty ship built in the shipyards are included in the park.

National Historic Landmarks and National Register Districts that reflect the theme of Shaping the Political Landscape:

Harada House (Riverside, California)

The Harada House was the object of the first test of the constitutionality of an alien land law in the United States. In *California vs. Harada* (1916–18), the right of native-born citizens of the United States, albeit minors, to own land was upheld. Directly associated with Japanese Americans, the case is important to all Americans of immigrant heritage. Though the Harada family was incarcerated during World War II, the house is still owned by a member of the family.

The Harada House was the subject of a California court decision that upheld the land ownership rights of U.S.-born children of immigrants. Photo: Allan Curl, National Historic Landmarks Program, NPS.

CHANGING ROLE OF THE UNITED STATES IN THE WORLD COMMUNITY

This theme explores diplomacy, trade, cultural exchange, security and defense, expansionism—and, at times, imperialism. The interactions among indigenous peoples, between this nation and native peoples, and this nation and the world have all contributed to American history. Additionally, this theme addresses regional variations, since, for example, in the eighteenth century, the Spanish southwest, French and Canadian middle west, and British eastern seaboard had different diplomatic histories.

America has never existed in isolation. While the United States, especially in the nineteenth and twentieth centuries, has left an imprint on the world community, other nations and immigrants to the United States have had a profound influence on the course of American history.

The emphasis in this category is on people and institutions—from the principals who define and formulate diplomatic policy, such as presidents, secretaries of state, and labor and immigrant leaders, to the private institutions, such as the Carnegie Endowment for International Peace, that influence America's diplomatic, cultural, social, and economic affairs. Topics that help define this theme include international relations, commerce, expansionism and imperialism, and immigration and emigration policies.

Relevant topics for Honouliuli Camp and the U.S. Immigration Station are 1) international relations and 2) immigration and emigration policies.

Relevance of the Theme to the Sites

As sites associated with the history of incarceration in Hawai'i, Honouliuli and the U.S. Immigration Station engage themes of security and defense, immigration policies, cultural exchange, and diplomacy. This is evidenced by the government's internment of immigrants—U.S. citizens as well as resident aliens—and its adherence to the Geneva Conventions in the humane treatment of prisoners of war.

Honouliuli Camp reflects the influence of martial law and illustrates the U.S. government's relations with other countries, particularly enemy nations, during World War II. The site's role as a prisoner of war camp is central to its history and distinguishes it from other civilian incarceration sites. Regular reports by the vice-consul of the neutral Swedish government constitute a significant portion of the camp's historic record, and the comparatively humane treatment of prisoners of war in the camp would have a long-term beneficial impact on U.S.-Japanese relations.

The U.S. Immigration Station in Honolulu demonstrates the changing role of the United States in the world community in its function as the entry point for thousands of immigrants to Hawai'i, who arrived in search of a better life, as well as for its role in detaining, questioning, and imprisoning members of Hawai'i's immigrant communities. Still in active use today and administered by the Department of Homeland Security, the station continues to reflect the struggle to balance the ideal of America as a land of opportunity with concerns about internal safety and security.

Units of the national park system that reflect the theme of the Changing Role of the United States in the World Community:

World War II Valor in the Pacific National Monument (Honolulu, Hawai'i)

This monument preserves and interprets the stories of the Pacific War, including the events at Pearl Harbor, the internment of Japanese Americans, the battles in the Aleutians, and the occupation of Japan. The United States responded to the Pearl Harbor attack with a sweeping mobilization of economic and military resources that fundamentally changed the U.S. position on the world stage.

War in the Pacific National Historical Park (Hagåtña, Guam)

Only hours after Pearl Harbor was attacked, the Japanese began aerial bombings on Guam. Two days later the Japanese came ashore and the naval governor surrendered the American territory: the island remained under Japanese control until July 21, 1944. War in the Pacific National Historical Park was established to commemorate the bravery and sacrifice of those participating in the campaigns of the Pacific theater of World War II and to conserve and interpret outstanding natural, scenic, and

historic values and objects on the island of Guam for the benefit and enjoyment of present and future generations.

National Historic Landmarks and National Register Districts that reflect the theme of the Changing Role of the United States in the World Community:

Attu Battlefield and U.S. Army and Navy Airfields (Attu Island, Alaska)

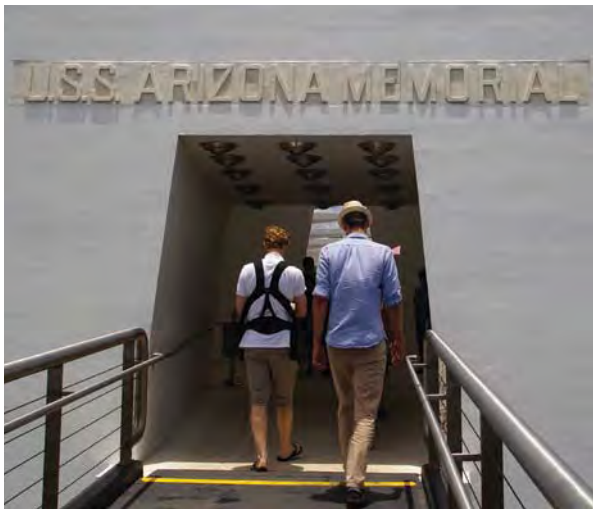
Attu was the site of the only World War II battle fought in North America. Its occupation by Japanese troops marked the peak of Japan's military expansion in the North Pacific. Its recapture by Americans in 1943 was costly for both sides. Afterward, Attu provided a base for bombing missions against Japanese territories.

Conclusion—Finding of Suitability

Honouliuli Internment Camp and the U.S. Immigration Station in Honolulu are nationally significant. While the mass incarceration of Nikkei on the U.S. mainland during World War II has been recognized as a significant episode in U.S. history, the story of internment in Hawai'i is little known. The experience of incarceration in the Hawaiian Islands was distinct from the mainland in that it was authorized by martial law and targeted a small group of civilians of Japanese, German, and Italian ancestry, singling them out as disloyal. Unlike mainland camps, in Hawai'i civilian detainees were confined alongside prisoners of war, whose experiences at sites like Honouliuli represent a unique and important aspect of Hawai'i's incarceration history.

The comparative sites described above represent various instances of forced confinement, loss and reaffirmation of civil liberties, preservation of culture in the face of adversity, and the influence of immigration and conflict on national politics and international relations. While some of the sites closely represent the history of Nikkei incarceration in the U.S., there are no sites that interpret the unique history of World War II internment in the Hawaiian Islands.

Honouliuli Camp and the U.S. Immigration Station offer a special opportunity to expand our nation's history of incarceration of civilians during World War II. The educational potential of these sites is enhanced by their quality, or high level of integrity, as well as the quantity of their extant resources. Based on the analysis of comparable resources and interpretation already represented in units of the national park system, or protected and interpreted by others, this study concludes that Honouliuli Internment Camp and the U.S. Immigration Station depict a distinct and important aspect of American history associated with civil liberties in times of conflict that is not adequately represented or protected elsewhere, and are therefore suitable for inclusion in the national park system.



Photos (clockwise from top left): **1.** Pacific War map, World War II Valor in the Pacific National Monument. **2.** and **3.** The U.S.S. *Arizona* Memorial, part of World War II Valor in the Pacific National Monument, commemorates the December 7, 1941 bombing of Pearl Harbor. **4.** U.S. Marines visit War in the Pacific National Historical Park, where 70 years ago other Marines gave their lives to protect the United States. All photos: NPS.

Old road bed, looking west from Honouliuli to University of Hawai'i parcels. Photo: NPS, 2013.

CHAPTER 5: FEASIBILITY AND THE NEED FOR NPS MANAGEMENT

This section describes the National Park Service's analysis of whether nationally significant and suitable sites are feasible as a unit of the national park system and whether direct NPS management is clearly superior to other management options.

Introduction

FEASIBILITY

To be feasible as a new unit of the national park system, a resource must be (1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment, taking into account current and potential impacts from sources beyond proposed park boundaries, and (2) capable of efficient administration by the National Park Service (NPS) at a reasonable cost.

In evaluating feasibility, the NPS considers a variety of factors for a site(s), such as the following:

- Land use, current and potential site uses, ownership patterns, planning and zoning
- Access and public enjoyment potential
- Boundary size and configuration
- Existing resource degradation and threats to resources
- Public interest and support
- Social and economic impact
- Costs associated with operation, acquisition, development, and restoration

The feasibility evaluation also considers the ability of the NPS to undertake new management responsibilities in light of current and projected availability of funding and personnel.

An overall evaluation of feasibility is made after taking into account all of the above factors. These evaluations, however, may sometimes identify concerns or conditions, rather than simply reaching a yes or no conclusion. For example, some sites may be feasible additions to the national park system only if landowners are willing to sell, or the boundary encompasses specific areas necessary for visitor access or state or local governments will provide appropriate assurances that adjacent land uses will remain compatible with the site or sites' resources and values (NPS 2006).

Evaluation of Feasibility Factors

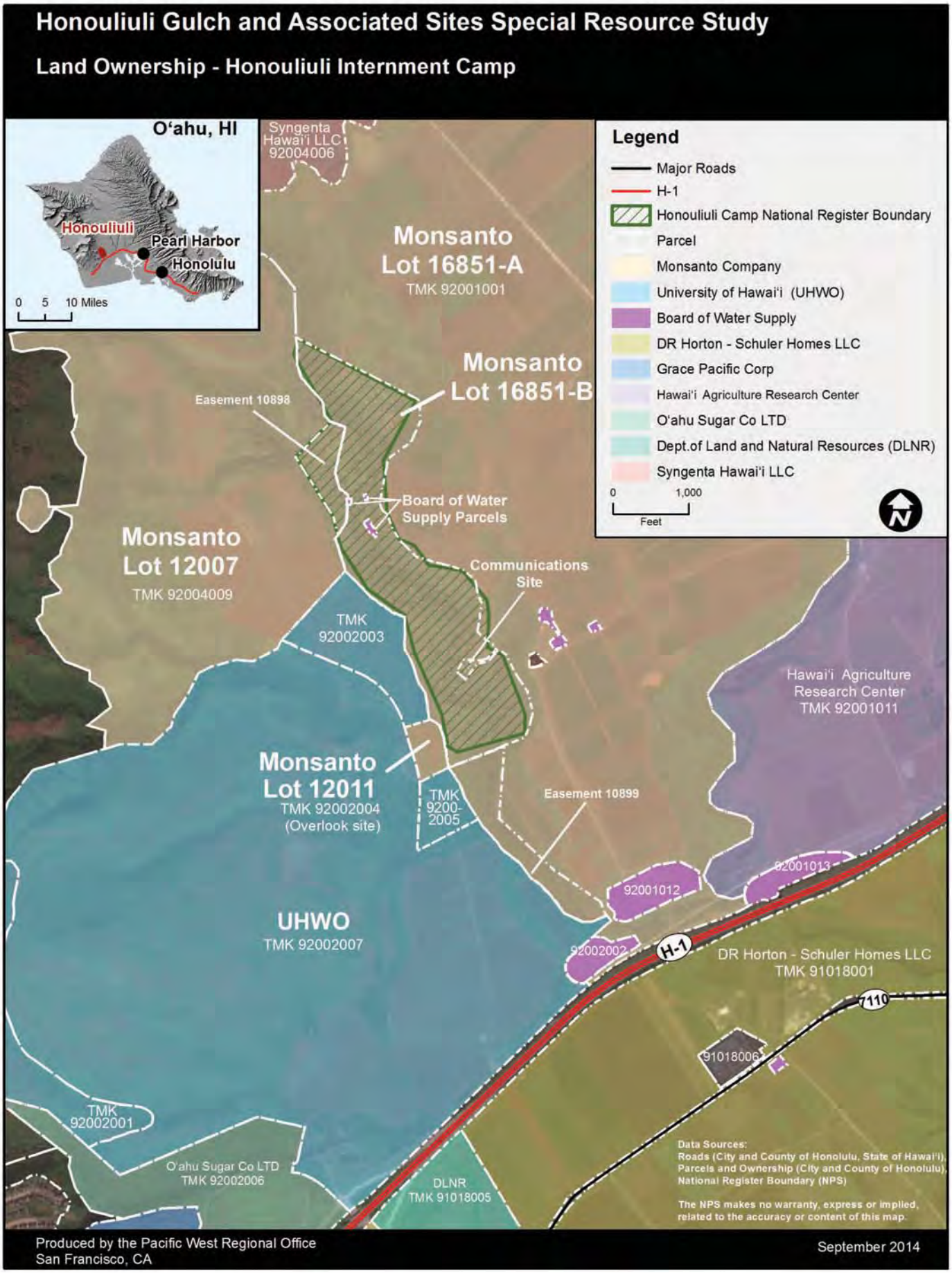
The NPS identified and studied 17 known sites that played a role in the history of the incarceration and internment of civilians and resident aliens in Hawai'i during World War II. Located throughout the six main islands of Hawai'i, they include internment camp locations, the U.S. Immigration Station in Honolulu, small local jails, police stations, and military camps.

This analysis of feasibility focuses on the two sites determined to be nationally significant and suitable for inclusion in the national park system. These sites are the Honouliuli Internment Camp and the U.S. Immigration Station; both are located on the island of O'ahu. The following evaluation explores the feasibility of these sites as potential units of the national park system.

LAND USE, OWNERSHIP PATTERNS, PLANNING AND ZONING

Honouliuli Internment Camp

Honouliuli Internment Camp is located approximately 15 miles west of downtown Honolulu, west of Kunia Road and north of Interstate H-1. The historic site, defined by the boundary established by the National Register of Historic Places (122.5 acres), is located on portions of three separate parcels owned by the Monsanto Company, identified as Honolulu County tax map keys (TMKs) (1) 9-2-001-001 (Lots 16851-A and 16851-B) and (1) 9-2-004-009 (Lot 12007). Parcel (1) 9-2-001-001 is approximately 1,830 acres. The Monsanto Company has recently subdivided 116 acres of this parcel (Lot 16851-B), which contains most of the historic camp features. Lot 12007 is 437 acres, nine of which include historic camp features. (See Map: Land Ownership–Honouliuli Internment Camp).


Honouliuli Gulch and Associated Sites Special Resource Study
Land Ownership - Honouliuli Internment Camp
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Syngenta Hawai'i LLC 92004006
Monsanto Lot 16851-A
TMK 92001001
Monsanto Lot 16851-B
Easement 10898
Board of Water Supply Parcels
Monsanto Lot 12007
TMK 92004009
Communications Site
TMK 92002003
Hawai'i Agriculture Research Center TMK 92001011
Monsanto Lot 12011
TMK 92002004 (Overlook site)
TMK 9200-2005
Easement 10899
92001013
92001012
UHWO
TMK 92002007
92002002
H-1
DR Horton - Schuler Homes LLC TMK 91018001
7110
91018006
TMK 92002001
O'ahu Sugar Co LTD TMK 92002006
DLNR TMK 91018005
Legend
Major Roads
H-1
Honouliuli Camp National Register Boundary
Parcel
Monsanto Company
University of Hawai'i (UHWO)
Board of Water Supply
DR Horton - Schuler Homes LLC
Grace Pacific Corp
Hawai'i Agriculture Research Center
O'ahu Sugar Co LTD
Dept.of Land and Natural Resources (DLNR)
Syngenta Hawai'i LLC
0 1,000
Feet
N
Data Sources:
Roads (City and County of Honolulu, State of Hawai'i),
Parcels and Ownership (City and County of Honolulu),
National Register Boundary (NPS)
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The Monsanto Company purchased the property from the James Campbell Company in 2007. James Campbell acquired the land in 1877. Prior to 1877, the area was located within the ahupuaʻa of Honouliuli, one of 13 traditional land divisions of the Moku of ʻEwa. The Honouliuli ahupuaʻa includes the entire watershed from Honouliuli Gulch into Kaihuopalaʻai, the West Loch of Pearl Harbor. Human habitation and farming date to as early as 400 A.D. (Burton and Farrell 2008).

Oʻahu Sugar Company leased the property from James Campbell and the successor James Campbell Estate starting in 1889 for use as a sugarcane plantation. Because of the steep topography along the edges of the Honouliuli Gulch, the area was not used for sugarcane or pineapple cultivation. The U.S. Army used the site for the internment camp from 1943–46. Following the war, Oʻahu Sugar Company resumed operations until the mid-1990s, when irrigable land above the gulch was converted to pineapple cultivation under Fresh Del Monte Produce Inc. Starting in 1958 and continuing until 2001, portions of uncultivated land in the gulch were leased for a cattle ranching operation (Integral Consulting, Inc. 2013). Since 2001, most of Honouliuli Gulch has not been actively used.

The City and County of Honolulu Board of Water Supply (BWS) owns three small parcels within the gulch. The parcels house three municipal water supply wells (Honouliuli II-1, II-2, and II-3), a concrete control building, and water treatment plant. The three separate parcels are currently fenced and maintained by BWS. Parcels include TMK (1) 9-2-001-008 (0.4 acres), TMK (1) 9-2-001-009 (0.1 acres), and TMK (1) 9-2-001-0010 (0.1 acres). There is a recently paved access road entering the gulch from the east side across Monsanto property to access the BWS sites. BWS also operates two water reservoirs adjacent to the southernmost corner of the property near the H-1 Freeway (Honouliuli 228). BWS holds access easements over Monsanto parcel TMK (1) 9-2-001-001.

The Board of Water Supply parcels within the gulch provide underground sources of drinking water for the public and require a Declaration of Restrictive Covenants limiting the treatment and disposal of wastewater within the gulch. This covenant would not preclude NPS resource management or public enjoyment of the site. However, it would limit the types of facilities permitted in the historic site.

Large satellite dishes owned by the KITV television station are located within a fenced enclosure in the southeastern area of the gulch on Monsanto parcel TMK (1) 9-2-001-009 (Integral Consulting, Inc. 2013).

All adjoining properties have historically been in ranching or agricultural use. The nearest residential development is located east of Kunia Road, approximately one mile from Honouliuli Gulch. The property adjacent to the Monsanto Company to the south and southwest is primarily owned by the state of Hawaiʻi as part of the new campus of the University of Hawaiʻi—West Oʻahu (UHWO). These parcels include TMK (1) 9-2-002-003 (38 acres), (1) 9-2-002-005 (12 acres), and (1) 9-2-002-007 (860 acres). Currently zoned for agricultural uses, UHWO has identified these parcels for either university or non-university related

Photos (top to bottom): **1.** City and County of Honolulu Board of Water Supply water treatment plant, Honouliuli. **2.** City and County of Honolulu Board of Water Supply well, Honouliuli. Photos: NPS, 2013.

Photos (clockwise from top left): **1.** Overlook site (Monsanto Parcel 3), Honuliuli. Photo: NPS, 2013. **2.** Western access road traveling north, Honouliuli. Photo: NPS, 2013. **3.** Aerial view of Honouliuli Gulch looking south, showing both Monsanto lands (left) and University of Hawai‘i–West O‘ahu lands (right) and Board of Water Supply facilities in the foreground. Pearl Harbor is visible in the upper left. Photo: Monsanto Company. **4.** KITV satellite dishes visible from access road, Honouliuli. Photo: NPS, 2011.

development. The University of Hawai‘i is currently working on a strategic land use plan that will determine the future use of its parcels adjacent to Honouliuli Internment Camp.

Nestled between parcels 9-2-002-003 and 9-2-002-005 is a separate 7-acre parcel owned by the Monsanto Company, TMK (1) 9-2-002-004. This 7-acre parcel (also referred to as the "overlook site") is relatively level and offers expansive views of Pearl Harbor, downtown Honolulu, and Diamond Head. Previously used for agricultural purposes, it is currently fallow.

Western access to the Honouliuli Internment Camp is through the UHWO parcels. The Monsanto Company parcels have a terminable right of entry over existing dirt roads that traverse UHWO lands, providing southern and western access routes to the site. The Monsanto Company also has a non-exclusive easement for ingress and egress over 9-2-002-007 (Easement 6134). A separate easement (Easement 51) across UHWO parcel (1) 9-2-002-007 provides access to the H-1 Freeway via Kapolei North-South Road.

In light of the interest in a potential unit of the national park system, the Monsanto Company has subdivided TMK (1) 9-2-001-001 and TMK (1) 9-2-001-009 to create three separate conservation easements that it could potentially transfer to the NPS. The Monsanto Company also created a new standalone fee parcel (Lot 15861-B, 116 acres) over the historic site to transfer for conservation purposes. (See Map: Land Ownership–Honouliuli Internment Camp). The Monsanto Company has also expressed a desire to transfer title to the 7-acre overlook site (Lot 12011) to the National Park Service.

Zoning

State land use law (Chapter 205, Hawai‘i Revised Statutes) establishes an overall framework of land use management whereby all lands in the state of Hawai‘i are classified into one of four districts. The Monsanto Company and UHWO parcels are zoned for agricultural use, for which parks, community facilities, and sites of historical interest are considered permissible uses as specified in Chapter 205 of Hawai‘i Revised Statutes (§205-4.5 (a)(6)(8)). City and County of Honolulu local zoning allows for public uses and structures in zone AG-1 (Revised Ordinances of Honolulu 1990). The recently adopted *‘Ewa Development Plan*, the City and County of Honolulu's long-range land use and infrastructure plan for the ‘Ewa region, identifies Honouliuli Internment Camp as one of ‘Ewa's significant historic features and landmarks and calls for its protection and preservation (See Maps: Zoning—Honouliuli Internment Camp, State Land Use Districts, and *‘Ewa Development Plan*, Urban Land Use Map).

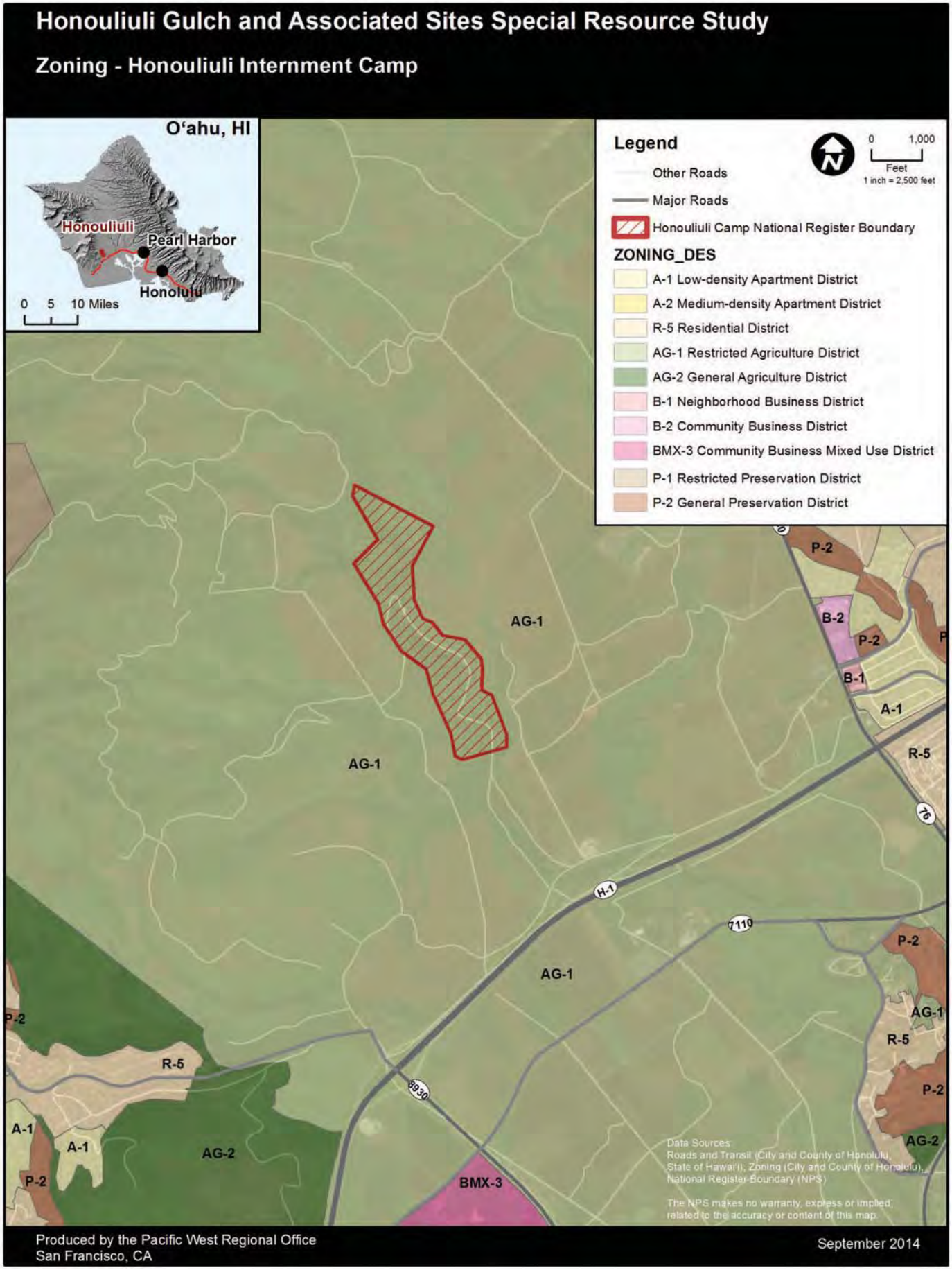
Establishment of a national park unit that would include Honouliuli Internment Camp is consistent with state and local land use policies and guidance including, *The Hawai‘i State Plan*, the *City and County of Honolulu General Plan* and Revised Ordinances of 1990, and the *‘Ewa Development Plan* (Hawai‘i Department of Planning and Economic Development 1986, City and County of Honolulu 2002 and 2013).

U.S. Immigration Station

Land Use and Ownership

The U.S. Immigration Station complex at 595 Ala Moana Boulevard is located in downtown Honolulu adjacent to Honolulu Harbor. As described in Chapter 3: Resource Significance, the U.S. Immigration Station was listed in the National Register of Historic Places in 1978. The U.S. Immigration Station Complex site is 4.5 acres located on two separate parcels. The larger parcel (TMK 2-1-015-018) contains all but one of the four buildings associated with the complex and is currently occupied by the U.S. Department of Homeland Security's Immigration and Customs Enforcement. The smaller parcel (TMK 2-1-015-019) is owned by the Hawai‘i Community Development Authority (See Map: Land Ownership–U.S. Immigration Station).

Three of the four buildings associated with the complex—the former administration building, lounging shed, and garage/waiting shed—are currently used by Department of Homeland Security for general office functions. These structures are not open to the general public. The fourth structure, the former Detention Building, was at one point determined surplus by the federal government and subsequently transferred to the Hawai‘i Community Development Corporation. This two-story building is currently occupied by the Hawai‘i State Department of Health.


Honouliuli Gulch and Associated Sites Special Resource Study
Zoning - Honouliuli Internment Camp
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
0 1,000
Feet
1 inch = 2,500 feet
Other Roads
Major Roads
Honouliuli Camp National Register Boundary
ZONING_DES
A-1 Low-density Apartment District
A-2 Medium-density Apartment District
R-5 Residential District
AG-1 Restricted Agriculture District
AG-2 General Agriculture District
B-1 Neighborhood Business District
B-2 Community Business District
BMX-3 Community Business Mixed Use District
P-1 Restricted Preservation District
P-2 General Preservation District
AG-1
AG-1
AG-1
AG-1
AG-2
AG-2
BMX-3
P-2
B-2
B-1
A-1
R-5
H-1
76
7110
8930
Data Sources:
Roads and Transit (City and County of Honolulu, State of Hawai'i), Zoning (City and County of Honolulu), National Register Boundary (NPS)
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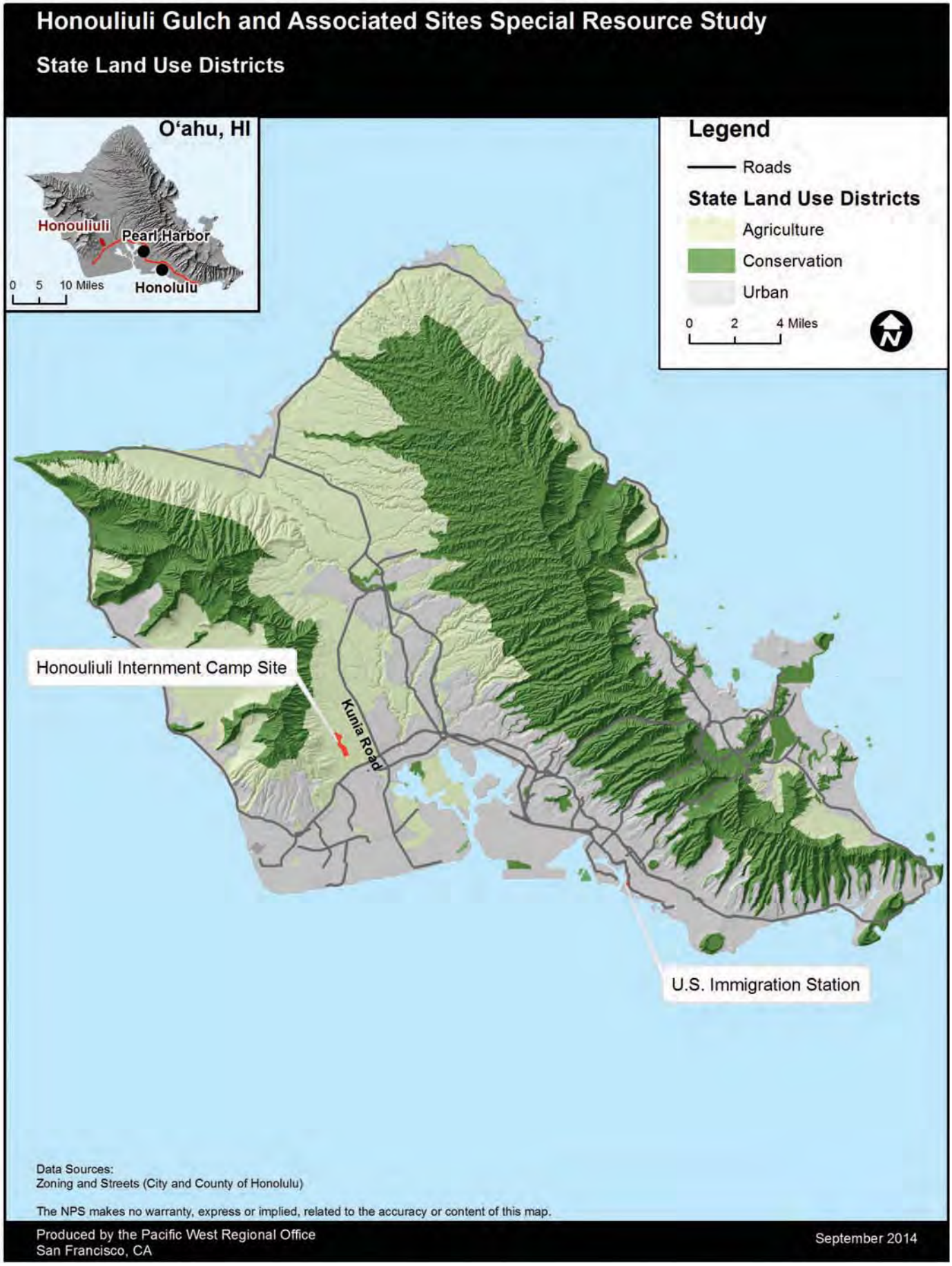
Honouliuli Gulch and Associated Sites Special Resource Study
State Land Use Districts
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
Roads
State Land Use Districts
Agriculture
Conservation
Urban
0 2 4 Miles
N
Honouliuli Internment Camp Site
Kunia Road
U.S. Immigration Station
Data Sources:
Zoning and Streets (City and County of Honolulu)
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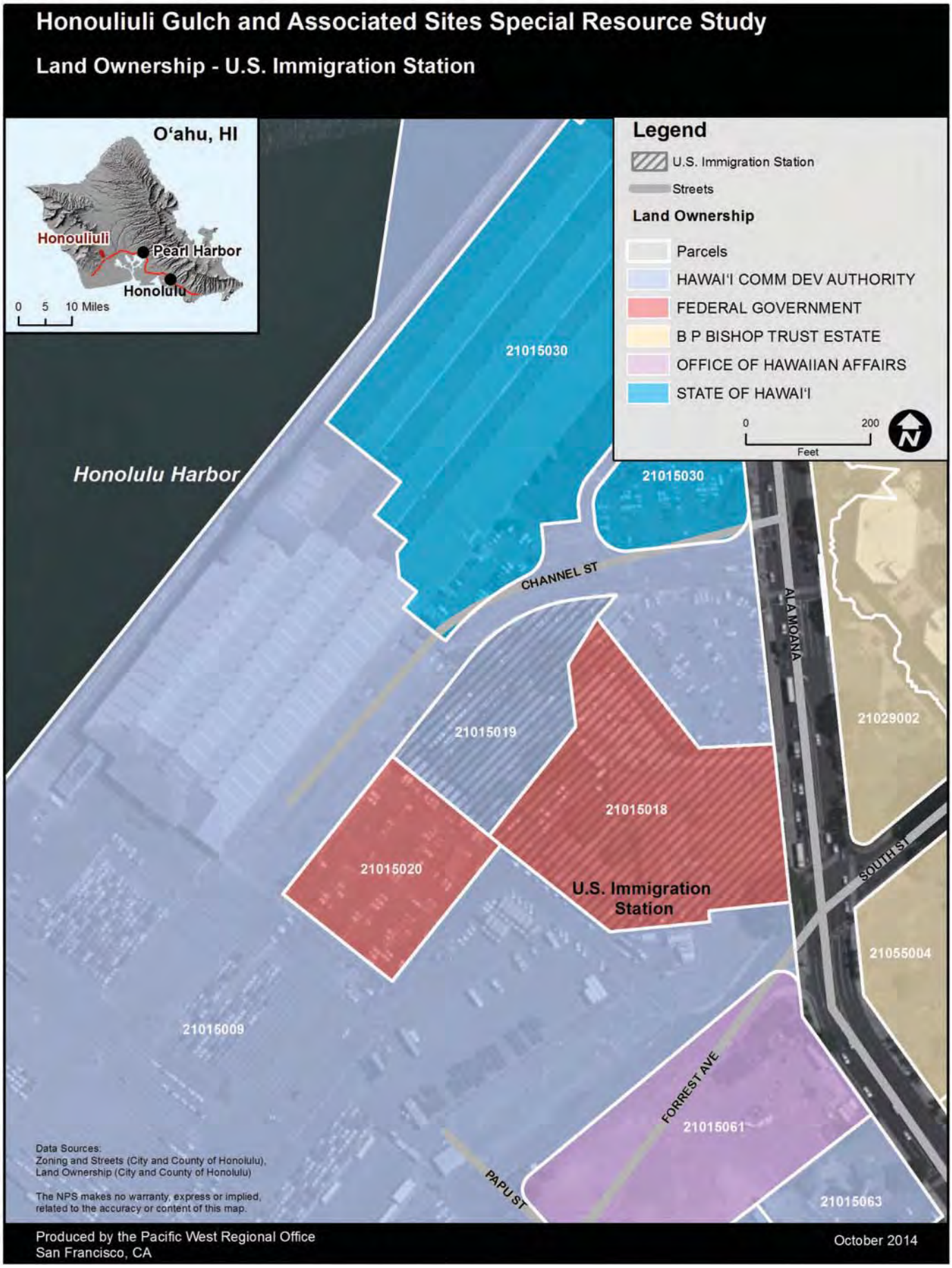
Honouliuli Gulch and Associated Sites Special Resource Study
Land Ownership - U.S. Immigration Station
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
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U.S. Immigration Station
Streets
Land Ownership
Parcels
HAWAI'I COMM DEV AUTHORITY
FEDERAL GOVERNMENT
B P BISHOP TRUST ESTATE
OFFICE OF HAWAIIAN AFFAIRS
STATE OF HAWAI'I
0 200
Feet
Honolulu Harbor
21015030
21015030
CHANNEL ST
ALA MOANA
21029002
21015019
21015018
21015020
U.S. Immigration Station
SOUTH ST
21055004
21015009
FORREST AVE
21015061
PAPU ST
21015063
Data Sources:
Zoning and Streets (City and County of Honolulu),
Land Ownership (City and County of Honolulu)
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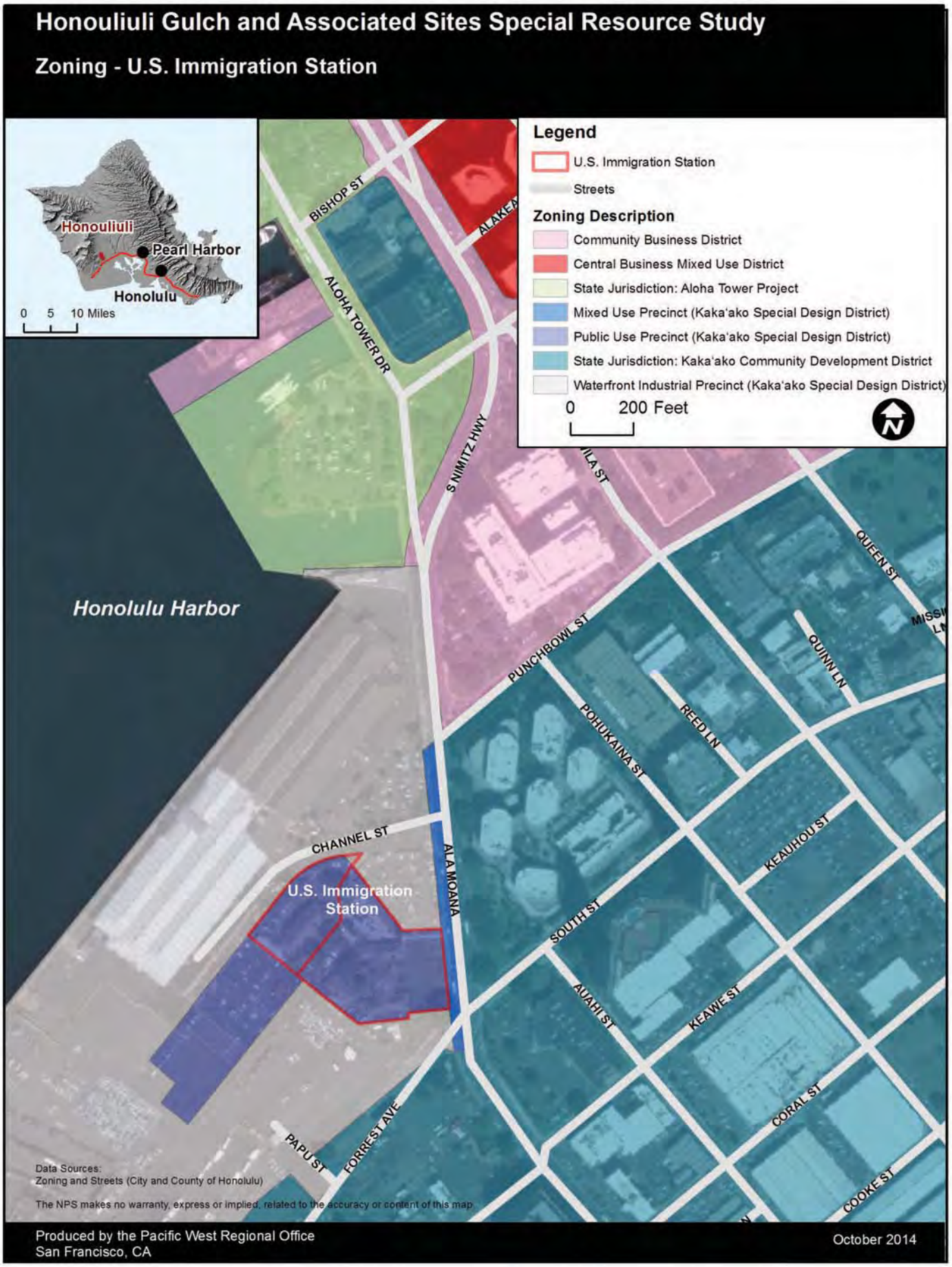
Honouliuli Gulch and Associated Sites Special Resource Study
Zoning - U.S. Immigration Station
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
U.S. Immigration Station
Streets
Zoning Description
Community Business District
Central Business Mixed Use District
State Jurisdiction: Aloha Tower Project
Mixed Use Precinct (Kaka'ako Special Design District)
Public Use Precinct (Kaka'ako Special Design District)
State Jurisdiction: Kaka'ako Community Development District
Waterfront Industrial Precinct (Kaka'ako Special Design District)
0 200 Feet
N
BISHOP ST
ALOHA TOWER DR
S NIMITZ HWY
Honolulu Harbor
PUNCHBOWL ST
POHUKAINA ST
REED LN
QUINN LN
QUEEN ST
CHANNEL ST
U.S. Immigration Station
ALA MOANA
KEAUHOU ST
SOUTH ST
AUAHI ST
KEAWE ST
CORAL ST
COOKE ST
PAPU ST
FORREST AVE
Data Sources:
Zoning and Streets (City and County of Honolulu)
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October 2014

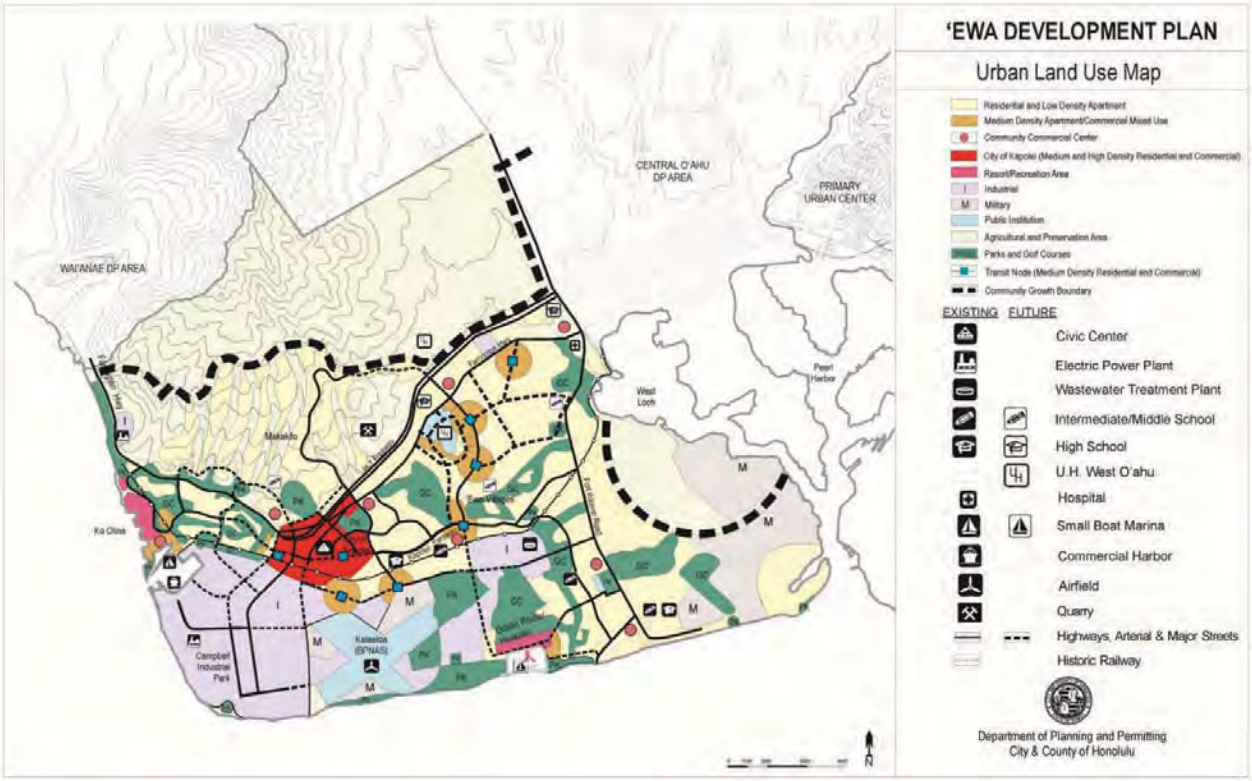
Zoning

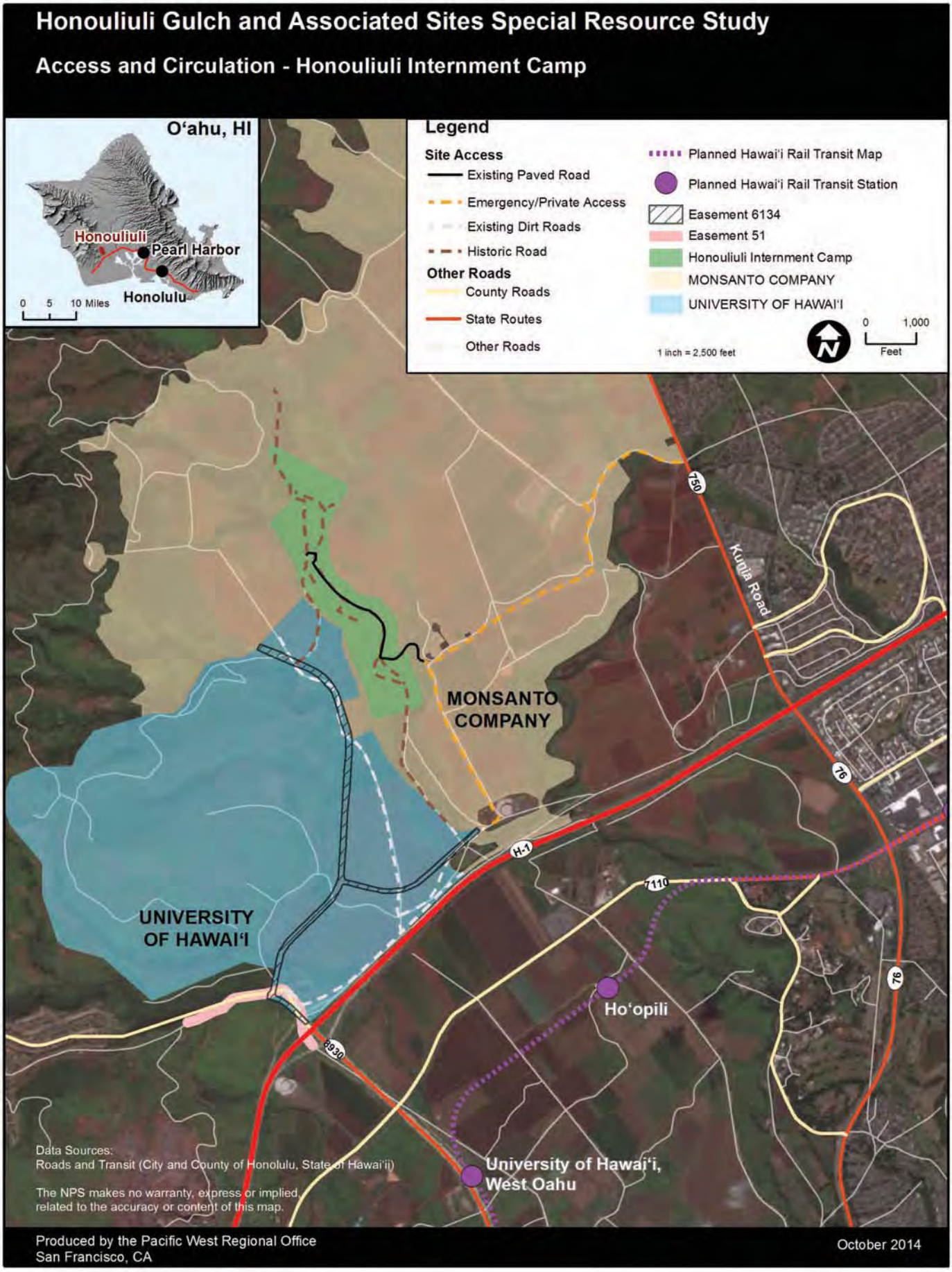
The U.S. Immigration Station parcels are located within an urban district under state land use law. Urban districts are typically regulated by county ordinances. The U.S. Immigration Station is within the City and County of Honolulu's public use precinct of the Kakaako Special Design District. The intent of the Kakaako Special Design District is to guide growth towards a mix of residential, commercial, and industrial uses and to ensure that the area includes public and private developments that are sensitive to the physical environment and will encourage diversification. The purpose of the district's public use precinct is to set aside lands to meet public requirements and the recreation and open space needs of the district. Public uses and structures are permitted (Honolulu Revised Ordinances, Section 21-F.4 (e)). Surrounding land use is primarily commercial, public, and industrial (port) (see Map: Zoning–U.S. Immigration Station).

Conclusion—Land Use, Ownership Patterns, Planning and Zoning

Current land use, ownership patterns, and zoning associated with Honouliuli Internment Camp would not conflict with management of a national park unit. Primary resources associated with the camp are located on property owned by the Monsanto Company. Monsanto has expressed its interest in donating portions of the property to the NPS for establishment of a national park unit (Lot 16851-B and Lot 12011). Surrounding lands are currently in agricultural use which is compatible with the camp's historic setting. Current land use, ownership, and zoning would be compatible with direct NPS management and ownership of the Honouliuli Internment Camp as a national park unit.

Existing use of the U.S. Immigration Station by the U.S. Department of Homeland Security and Hawai'i State Department of Health would not be compatible with use as a national park unit. However, if the U.S. Immigration Station facilities were no longer needed by the U.S. Department of Homeland Security or the Hawai'i State Department of Health, additional NPS analysis would be needed to determine the feasibility of management options and associated costs. Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration.The U.S. Immigration


'EWA DEVELOPMENT PLAN
Urban Land Use Map
Residential and Low Density Apartment
Medium Density Apartment/Commercial Mixed Use
Community Commercial Center
City of Kapolei (Medium and High Density Residential and Commercial)
Resort/Recreation Area
Industrial
Military
Public Institution
Agricultural and Preservation Area
Parks and Golf Courses
Transit Node (Medium Density Residential and Commercial)
Community Growth Boundary
EXISTING FUTURE
Civic Center
Electric Power Plant
Wastewater Treatment Plant
Intermediate/Middle School
High School
U.H. West O'ahu
Hospital
Small Boat Marina
Commercial Harbor
Airfield
Quarry
Highways, Arterial & Major Streets
Historic Railway
Department of Planning and Permitting
City & County of Honolulu
CENTRAL O'AHU DP AREA
PRIMARY URBAN CENTER
WAI'ANAE DP AREA
Pearl Harbor
West Loch
Makakilo
Ko Olina
Campbell Industrial Park
Kalaeloa (DP NAS)
Ocean Pointe
Fort Weaver
Kapolei
Kunia Road
Farrington Hwy
Fort Barrette Road
Renton Road
Geiger Road
Kalaeloa Blvd
Coral Sea Road
Ala Kai
Ala Hoku
Ala Ahi
Ala Ono
Ala Ilima
Ala Lani
Ala Ola


Honouliuli Gulch and Associated Sites Special Resource Study
Access and Circulation - Honouliuli Internment Camp
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
Site Access
Existing Paved Road
Emergency/Private Access
Existing Dirt Roads
Historic Road
Other Roads
County Roads
State Routes
Other Roads
Planned Hawai'i Rail Transit Map
Planned Hawai'i Rail Transit Station
Easement 6134
Easement 51
Honouliuli Internment Camp
MONSANTO COMPANY
UNIVERSITY OF HAWAI'I
1 inch = 2,500 feet
0 1,000
Feet
750
Kunia Road
MONSANTO COMPANY
76
H-1
7110
UNIVERSITY OF HAWAI'I
Ho'opili
8930
76
University of Hawai'i, West Oahu
Data Sources:
Roads and Transit (City and County of Honolulu, State of Hawai'i)
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San Francisco, CA
October 2014

Station complex would not be feasible for direct NPS management and ownership as part of a national park unit at this time.

ACCESS AND PUBLIC ENJOYMENT POTENTIAL

Honouliuli Internment Camp

Access

Honouliuli Gulch is within a 30-minute drive of Honolulu and the major tourist areas of Waikiki, Ko‘Olina, and Pearl Harbor. Although existing transit systems do not currently provide stops near the site, the planned Hawai‘i Rail Transit (HRT) system will provide rail passenger services to two nearby stops at University of Hawai‘i—West O‘ahu and Ho‘opili (See Map: Access and Circulation–Honouliuli Internment Camp).

Honouliuli Internment Camp is currently located on private land that is inaccessible to the public. There is no dedicated parking area onsite, and vehicular access is via narrow unpaved and paved roads. Monsanto employees and other agencies and private organizations with interests and activities in the vicinity of Honouliuli Internment Camp access the site through privately maintained roads that are secured by locked gates. Most of the existing access routes are agricultural roads which have steep grades and unstable surfaces, and some areas are overgrown with vegetation (United States Department of Transportation 2013).

There are two main access points to reach Honouliuli Internment Camp. The first access route is from the east via Kunia Road along a recently paved road through the Monsanto Company offices and agricultural fields. The paved road extends north to the Board of Water Supply parcels within the gulch. Along this road at an intersection west of the satellite dish site, an older overgrown dirt road heads south along the gulch to a former dumping site. Public access on the Monsanto Company property east of the gulch would not be compatible with Monsanto employees’ use of these roads for agricultural research activities.

The second access point is from the west via the H-1 Freeway at Kapolei North-South Road. From this point the historic site can be accessed across UHWO-owned parcels on unpaved agricultural roads that are controlled by multiple locked gates. The western access route traverses the 7-acre overlook site, a relatively flat parcel that could function as a staging area with parking, drop-off areas, and trail access

Paved eastern access road and gate, Honouliuli. Photo: NPS, 2011.

into Honouliuli Gulch. This route would appear to be the most feasible route for public use of the site, assuming rights of access can be obtained. Existing roads have a steep surface, uneven grade, and overgrown vegetation and would require varied amounts of resurfacing, restoration, rehabilitation, and in some cases may require realignment. The roads would thus require considerable improvement to meet NPS standards for a Class II Connector Park Road. A Class II Connector Park Road is one that provides access within a park to areas of scenic, scientific, recreation or cultural interest such as overlooks, campgrounds, etc. (United States Department of Transportation 2013).

The site is also accessible from the west via an undeveloped appurtenant easement ("Easement 6134"). Presently, UHWO and Monsanto use the existing agricultural roads to access land along the west side of the gulch. In the event a park unit was designated and NPS were to acquire an interest in the gulch site prior to development of Easement 6134, NPS would need to obtain a right to use existing roads on UHWO land. NPS would need to ensure use of the existing roads until such time as the easement was adequately developed for public access.

Administrative access could be feasible from the southern end of the gulch along a road that runs north-south from the H-1 Freeway area. There is no legal access to the highway from this north-south road. Therefore, the road would still need to be accessed via UHWO parcels and access roads from the west.

In summary, current access to Honouliuli Internment Camp is through private, undeveloped agricultural roads. Access from the west over UHWO lands is the most feasible route for providing long-term public access to the historic site. Rights of access from UHWO would be necessary to secure public access to the historic site. Considerable road improvements would also be required to provide for public access.

Photos (top to bottom):**1.** Honouliuli Day of Remembrance, 2011. **2.** Bus stop outside the U.S. Immigration Station, 2013. Photos: NPS.

Public Enjoyment Potential

As described in the suitability section, Honouliuli Internment Camp provides excellent opportunities to convey the story of World War II incarceration and internment in Hawai'i. The experience in Hawai'i is markedly different from mainland incarceration sites. Protection of Honouliuli Internment Camp as a national park site would also expand and enhance interpretive opportunities for visitors to World War II Valor in the Pacific National Monument at Pearl Harbor which interprets the Japanese attack on O'ahu on December 7, 1941 and the broader Pacific War story. Public visitation to Honouliuli Internment Camp could be accommodated with site improvements to provide vehicle access, parking, trails, and interpretative features where appropriate.

Honouliuli Gulch and Associated Sites Special Resource Study
Access and Circulation - U.S. Immigration Station
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
Bus Stop
Bus Route
Planned Hawai'i Rail Transit Station
Planned Hawai'i Rail Transit Map
Streets
U.S. Immigration Station
0 200
Feet
1 inch = 400 feet
Honolulu Harbor
U.S. Immigration Station
BISHOP ST
ALAKEA ST
ALOHA TOWER DR
S NIMITZ HWY
HALEKAUWILA ST
MILILANI ST
QUEEN ST
PUNCHBOWL ST
POHUKAINA ST
REED LN
QUINN LN
CHANNEL ST
ALA MOANA
KEAUHOU ST
SOUTH ST
AUAHI ST
KEAWE ST
CORAL ST
COOKE ST
PAPU ST
FORREST AVE
Data Sources:
Roads and Transit (City and County of Honolulu, State of Hawai'i)
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Within the historic site, visitors can experience the physical confinement afforded by the topography of Honouliuli Gulch. Although expansive views to Honolulu and Diamond Head exist just outside of the historic site at the top of the gulch, internees and prisoners had no visual access to areas beyond.

Contemporary uses of the historic site such as the communications facilities and the Board of Water Supply wells and treatment plant would not detract from the overall visitor experience. From most areas within the historic camp area, these features are obscured by dense vegetation.

Visitor facilities within the historic site would be limited to protect the integrity of the resources. Restrictive covenants that prevent the treatment and disposal of wastewater within the gulch, given current use of the site for municipal water supply, also limit site development. Appropriate facilities within the gulch could include primitive access roads, trails, waysides, or vault toilets, to the extent that such features are sited in a way that would not affect the integrity of the historic site.

Although most of the site is overgrown with vegetation, the Japanese Cultural Center of Hawai'i (JCCH) has been taking care of the vegetation cutting to provide access for occasional guided tours in a small area of the site. Additional clearance would be necessary to provide access and public enjoyment opportunities to other areas of the historic site.

The 7-acre overlook site, located just west of the historic site at the top of the gulch, provides a suitable location for primary visitor access and facilities. The overlook site is relatively level, affording opportunities for parking and drop-off areas, visitor contact facilities, interpretive features, and restrooms. The historic site can be accessed from here via a historic road alignment that is visible in aerial photos of the Honouliuli Internment Camp during World War II. The overlook site also features expansive views encompassing surrounding agricultural lands, Pearl Harbor, and Honolulu, which provide greater context and setting for interpreting the World War II internment in Hawai'i. The Monsanto Company has offered to donate this parcel to the NPS, in addition to areas included in the National Register of Historic Places boundary.

Partnership opportunities with organizations such as JCCH and UHWO could further enhance public enjoyment opportunities. JCCH and UHWO have an interest in the site for research, education, and for remembrance and commemoration. The JCCH provides a variety of public education and interpretation programs about Honouliuli, including staffing occasional tours of the site and holding an annual day of remembrance at Honouliuli Internment Camp.

U.S. Immigration Station

Access

Located on Ala Moana Boulevard, a main thoroughfare in downtown Honolulu, the U.S. Immigration Station site is currently accessible via car and transit and is in walking distance to areas in downtown Honolulu. Honolulu's Department of Transportation Services (lines 8 and 20) stop directly in front of the complex. However, current use of the building by the U.S. Department of Homeland Security and the Hawai'i State Department of Health does not allow for general public access (See Map: Access and Circulation–U.S. Immigration Station).

Public Enjoyment Potential

Given current uses of the U.S. Immigration Station, direct public access to the area is not currently feasible.

Conclusion—Access and Public Enjoyment Potential

Public access from the west to Honouliuli Internment Camp would be feasible if permanent rights of access could be obtained over adjacent lands and with considerable road improvements. Additional improvements at the 7-acre site above the gulch for parking, trails and walkways, and interpretative features would enhance the feasibility of park operations. Without these lands, given the limited development that could occur in the historic site, visitor staging facilities would likely be located at a more remote location. Trails, walkways, and interpretive features within the gulch would also be required to facilitate public enjoyment opportunities on the site.

At the present time, public access to the U.S. Immigration Station buildings is not feasible. Additional analysis of public enjoyment

Aerial view of the U.S. Immigration Station, 2013. A cruise ship dock is on the upper left, and downtown Honolulu is to the right. Base photo: Google Earth imagery.

potential would be warranted if the facilities were no longer needed by federal and state agencies.

BOUNDARY SIZE AND CONFIGURATION

An acceptable boundary for an envisioned unit of the national park system takes into consideration:

- inclusion and protection of the primary resources;
- sufficient surrounding area to provide a proper setting for the resources or to inter-relate a group of resources; and
- sufficient land for appropriate use and development.

Honouliuli Internment Camp

A suitable national park unit boundary for Honouliuli Internment Camp would include the area within the national register boundary and parcels west of the national register boundary to provide for site access and facilities to accommodate visitor use.

The 122.5-acre area in the National Register of Historic Places boundary for Honouliuli Internment Camp (national register boundary) contains over 130 features related to the internment and incarceration of American civilians, resident aliens, and prisoners of war during World War II. Remaining features include scattered artifacts and remnants of structures such as building foundations, guard towers, aqueducts, walkways, and roads (Burton and Farrell 2011).

The 122.5-acre historic site is currently bounded on four sides by the steep slopes of Honouliuli Gulch. Outside of the gulch the area is surrounded by agricultural lands, which are consistent with the surrounding land use during the site's period of significance (Burton and Farrell 2011).

In addition to the lands within the national register boundary, a suitable boundary would include the 7-acre overlook site to the west, currently owned by Monsanto, and 22.5 acres of land owned by Monsanto surrounding the drainage to the south of the national register boundary. These lands may contain archeological artifacts related to the internment camp.

Portions of the large UHWO parcel west of the overlook site could also be included to provide for public access. These parcels are agricultural lands either actively farmed or fallow. The University of Hawai‘i is currently completing a land use plan for its lands west of Honouliuli Internment Camp. If the university were to identify new road alignments as part of that planning process, which could be used to access Honouliuli Internment Camp, then a small boundary adjustment for this alignment could be considered to allow NPS to expend funds on road maintenance. The NPS would not need to directly own or manage UHWO lands to achieve these purposes.

U.S. Immigration Station

The 4.6-acre site boundary in the U.S. Immigration Station National Register of Historic Places designation consists of four main buildings located around an inner courtyard. Each of the four structures identified in the national register nomination remain on site, in their original locations, and the structures and grounds maintain their historic integrity.

A boundary that would include, at a minimum, the federally owned parcel of U.S. Immigration Station complex would be sufficient to protect the significance of the buildings and their setting as they relate to the incarceration of civilians and resident aliens during World War II and would allow for appropriate use and development of the site as a national park unit. However, this property is not currently available to NPS.

Conclusion—Boundary Size and Configuration

Honouliuli Internment Camp and the U.S. Immigration Station sites each provide for the inclusion and protection of the primary resources, in this case, nationally significant resources associated with the incarceration and internment of civilians, alien residents, and prisoners of war in Hawai‘i during World War II. Both sites include sufficient surrounding area to provide a proper setting for the resources. For Honouliuli Internment Camp, there is sufficient land available for appropriate use and development of the site . The U.S. Immigration Station is located in a highly developed area adjacent to an active port and a mix of other commercial uses. Its location, structures, and site arrangement would allow for protection of resources and appropriate public use of the site.

EXISTING RESOURCE DEGRADATION AND THREATS TO RESOURCES

The two nationally significant sites and resources are generally of high quality and have a high degree of integrity. Nevertheless, development plans and underutilization may pose a threat to some of these resources.

Honouliuli Internment Camp

An environmental site assessment was conducted for the historic site of the Honouliuli Internment Camp in May 2013 to identify “recognized environmental conditions.” “Recognized environmental conditions” include the presence of hazardous substances or petroleum products on the property from the property itself and from surrounding lands. No recognized environmental conditions were identified for the property. Pesticide and herbicide compounds remaining from former sugar cane and pineapple cultivation and potential Monsanto agricultural operations were found to be below regulatory levels. Although two World War II-era incinerator remnants were documented in archeological surveys, the environmental site assessment found no evidence of environmental impacts associated with metals and organic compounds typically associated with incinerator ash (Integral Solutions, Inc. 2013).

The remains of the foundations and other features at Honouliuli Gulch face threats from erosion and other sources of deterioration. Although no major actions are proposed for the property, current uses of the site have the potential for ground disturbance and potential impacts to archeological resources.

The area surrounding Honouliuli Gulch is one of the fastest growing areas on O‘ahu. However, surrounding areas are primarily zoned for agricultural use. Agricultural zoning does allow for development of structures for agricultural, educational, or recreational purposes. Future development of such facilities on surrounding lands would likely have a minimal impact on the visitor experience within the historic site as the steep sides of the gulch and dense visitation greatly limit views to the surrounding landscape.

Remaining structures, Honouliuli Internment Camp. Photo: NPS, 2010.

Development could also be sited away from Honoululi Gulch to minimize impacts on park operations, visitor access, and experience.

U.S. Immigration Station

At the U.S. Immigration Station, most of the remaining historic structures are located on federal property, and therefore must comply with preservation standards as required by the National Historic Preservation Act, Section 106 and 110 requirements. Section 106 requires federal agencies to take into account the effects of their undertakings on historic properties.

It should be noted that the NPS study team was only able to conduct a brief visual inspection of the U.S. Immigration Station for purposes of this special resource study. During this visit, facilities appeared to be in good condition with a high level of historic integrity. Although some modifications have been made to the building to accommodate current uses, such modifications are reversible and the overall integrity of the site and structures is high. If ownership and public access to the structures were to become feasible in the future, further analysis and evaluation of the facility conditions would be necessary to determine whether there are threats or resource degradation that would preclude NPS management of the site.

Conclusion—Existing Threats and Resource Degradation

There are no current threats to Honouliuli Internment Camp that would preclude management of the site as a unit of the national park system. Honouliuli Internment Camp contains resources with integrity sufficient for national historic landmark designation and NPS designation.

The U.S. Immigration Station is currently owned and maintained by federal and state agencies. While historic integrity appears high, additional analysis would be needed to evaluate potential threats or resource degradation that would preclude NPS management.

PUBLIC INTEREST AND SUPPORT

Public involvement efforts conducted in 2011 identified strong public support for the idea of establishing of a unit of the national park system that would preserve and interpret resources associated with the incarceration of Japanese Americans and European Americans

in Hawai‘i during World War II. Most public comments conveyed a desire for NPS management and for preservation of the sites and interpretation of the history, particularly at the Honouliuli Internment Camp. This would include developing key partnerships necessary to preserve the sites and leverage funding, interpreting the broader story through educational programs and designating a national park unit.

While commenters as a whole supported recognition of sites significant to the World War II internment in Hawai‘i , some expressed concern as to whether such recognition would have any adverse effects on local sites and communities. More detailed information about public scoping comments is included in Chapter 8: Consultation and Coordination.

Local organizations and institutions have been active in documentation, preservation, and interpretation efforts for Honouliuli Internment Camp. The JCCH conducted research that uncovered the location of historic site which was found as recently as 2002. The JCCH is also the largest repository of archives and collection items related to Honouliuli and the internment history in Hawai‘i. UHWO faculty are actively researching the history of Honouliuli. UHWO also participates with the Monsanto Company and JCCH on summer archeology field school programs at Honouliuli Internment Camp.

The state of Hawai‘i has been supportive of efforts to preserve and interpret Honouliuli Internment Camp. The Hawai‘i legislature commissioned a group, called the Honouliuli Park Site Advisory Committee, to support preservation of the Honouliuli site. The committee is directed to: 1) provide state support toward preservation of the Honouliuli site; 2) establish a mechanism to leverage county, state, federal, and private funding for an educational resource center at the site; and 3) memorialize the struggle for civil rights by Hawai‘i’s people.

Conclusion—Public Interest and Support

Outreach for this study has demonstrated significant public interest and support for an NPS park unit at Honouliuli Gulch in partnership with other organizations and local communities.

Photos (top to bottom):**1.** Flag marking the Japanese Cultural Center of Hawai‘i interpretive tour route, Honouliuli, 2013. **2.** Honouliuli Day of Remembrance, 2011. **3.** Remnants of stone steps in the guard camp compound, Honouliuli. All photos: NPS.

SOCIAL AND ECONOMIC IMPACT

Oʻahu/Honolulu County Socioeconomic Setting

Population

Oʻahu is the most populous island of Hawaiʻi, with over 970,000 residents, almost 70% of the state's population. Racial and ethnic diversity on Oʻahu is high. Approximately 43% identify themselves as Asian; while most others identify themselves as white (22%) or Native Hawaiian (10%). Over 20% identify themselves as representing two or more races (U.S. Census Bureau 2013).

Employment and Income

The median household income in Honolulu County is approximately $71,263 per year. Over 9% of the population lives in a household with income below the federally-determined poverty threshold (U.S. Census 2012). Almost 5% percent of the county's labor force was unemployed in June 2013 (U.S. Department of Labor: Bureau of Labor Statistics 2013).

Tourism

Tourism in Hawaiʻi is an $11 billion dollar industry, representing one-third of Hawaiʻi's Gross State Product. Oʻahu is the state's primary economic and tourism center, with Honolulu and Waikiki being the primary destination, with over four million annual visitors. The island had over 34,000 visitor units in 2009, including hotels, condominium hotels, timeshares, bed and breakfast, and individual vacation units. An estimated 81,000 visitors are on Oʻahu on any given day. Demand for eco, cultural and historical tourism, in particular, continues to increase (Helber Hastert and Fee Planners, Inc. 2010). Additional context on the socioeconomic environment of West Oʻahu is included in Chapter 7: Environmental Consequences.

Potential Impacts

Social and economic impacts of NPS designation could vary depending on the size and scope of the park unit, management approach and external variables such as local, regional and national economic forces, and actions of local public and private organizations and individuals.

Recognition or designation of a national park unit would likely have beneficial economic and social impacts on the area. Possible socioeconomic beneficial effects could include: expenditures from park operations and park staff, expenditures by visitors at local businesses, sales and hotel tax revenues from visitor expenditures, and growth in visitor-related businesses such as tourism. Additional analysis of social and economic impacts is provided in Chapter 7: Environmental Consequences.

Conclusion—Social and Economic Impact

The social and economic impacts of NPS designation or other support/coordination role appear to be largely beneficial and would support the feasibility of NPS designation.

COSTS ASSOCIATED WITH OPERATION, ACQUISITION, DEVELOPMENT, AND RESTORATION

Costs associated with a national park unit include annual operations costs and periodic costs of land acquisition, development of facilities, and resource restoration. Because the U.S. Immigration Station would not be feasible for direct public access and NPS management, costs are only analyzed for Honouliuli Internment Camp.

Land Acquisition Costs

The Monsanto Company has expressed the intent to donate lands associated with Honouliuli Internment Camp and the 7-acre overlook site to the National Park Service, should such a unit be established. The Monsanto Company has subdivided the land associated with the historic site into transferable interests at its own expense. No land acquisition costs are anticipated other than the administrative costs associated with land acquisition due diligence (title review, environmental compliance, etc.).

Development and Restoration Costs

Development costs of new national park units vary widely, depending on existing and desired conditions and facilities. New national park units frequently inventory and document the resources in the park; develop management or treatment plans for those resources; and plan for the desired visitor use, resource protection

objectives, and facilities to support visitors and park operations. It is difficult to provide detailed cost estimates for facilities prior to specific site planning that would occur following designation. However, since expenditures on site access would be necessary under any scenario, broad estimates for such costs are included in this section.

Assets that the NPS would manage include over 130 features related to the incarceration of American civilians, resident aliens, and prisoners of war during World War II. These features include two standing buildings, numerous building foundations, rock walls, fence remnants, artifact scatters, and other features. There are a several non-contributing features at the site, primarily from previous ranching and other agricultural uses. This includes corrals, a loading chute, remnants of a chicken farm, a road, and a rock wall. Board of Water Supply parcels and associated facilities would remain as inholdings and would continue to be managed by the City and County of Honolulu for municipal water supply. The communications site would not be included in the land available for donation to the NPS.

There may be opportunities for sharing facilities with partner organizations such as UHWO and JCCH for public access, visitor interpretation, museum collections, and storage. Specific visitor and operational facilities would be determined through future management planning for the national historic site or monument.

Visitor and Administrative Access

The primary development costs for operation of a national park unit at Honouliuli Gulch would be for visitor and administrative access. The Federal Highway Administration (FHA) analyzed several scenarios for public access to Honouliuli Internment Camp across UHWO parcels using existing road alignments. The study also analyzed administrative access to the gulch from the south along existing agricultural roads. The administrative access evaluated would enter the site near the H-1 Freeway and provide access to the middle of the historic site.

Because evaluation was cursory without the benefit of a full survey of existing roads, the FHA and NPS study team was unable to determine how much reconstruction and realignment of existing roads would be necessary. Estimates were provided for both 3R work (resurfacing, restoration, and rehabilitation) and 4R (resurfacing, restoration, rehabilitation, and reconstruction, or realignment). Reconstruction and realignment adds considerably to the cost for road improvements. The costs analyzed are based on standards for an NPS Class II Park Connector Road for public access from the west and an NPS Administrative Road Standard for the road from the south.

The analysis made several assumptions about public access: 1) easements would allow access to the site, 2) public access would be controlled via a gate, 3) the public access road would be paved, and 4) parking would be provided for less than 20 vehicles including bus stalls and turn around areas at the overlook site (Monsanto Parcel 3). Estimated costs range from $3 to $20 million for construction. The higher end of the range would be incurred if additional reconstruction or realignment is necessary for a portion of the road improvements (U.S. Department of Transportation 2013).

Transit Scenarios

The Federal Highway Administration also evaluated potential costs for transit options to Honouliuli Gulch originating from World War II Valor in the Pacific National Monument at Pearl Harbor (VALR) and UHWO. Costs to operate a bus connection from VALR three times per week was estimated at $25,000 to 30,000 annually. A second scenario evaluated transit service between UHWO and Honouliuli Gulch. It was assumed that the close proximity to the campus and the future light rail stop planned for that location could increase demand to visit the site. The total cost for this scenario was estimated at $91,000 to $112,000 annually.

Vegetation Removal

With the exception of the Board of Water Supply facilities and the KITV satellite dish site, Honouliuli Gulch has not been actively used for over ten years. Thus thick vegetation, primarily nonnative, invasive species such as Guinea grass (*Panicum maximum*), haole koa (*Leucaema* sp.), and Chinese banyan trees (*Ficus microcarpa*) have populated the site, obscuring roads and historic features and inhibiting access. Significant vegetation clearance would

be necessary to make the site accessible for visitation. Further evaluation of the site as a cultural landscape would inform appropriate measures for vegetation clearance in keeping with the site's historic setting.

Operational Costs

Operational costs of national park units vary widely, depending on site management, partnership opportunities, the amount and type of resources managed, number of visitors, level of programs offered, and many other factors. Given the close proximity of Honouliuli Internment Camp to existing NPS operations at World War II Valor in the Pacific at Pearl Harbor, some park operations could be shared with and supported by this existing park unit.

This section provides comparative budget figures for the operational costs of national park units that would be similar to those at Honouliuli Internment Camp. Comparable examples include national historic sites which share administration and resources with other nearby national park units. These examples include: 1) Minidoka National Historic Site located near Twin Falls, Idaho, 2) Eugene O'Neill National Historic Site in Danville, California, and 3) Muir Woods National Monument in Marin County, California. Manzanar National Historic Site is also provided for comparison, as a national park unit that interprets incarceration history during World War II.

Minidoka National Historic Site, established in 2001, preserves the features and history of the former Minidoka Relocation Center, which held 13,000 Nikkei from Washington, Oregon, California, and Alaska during World War II. Administration and operations for Minidoka are currently based out of the Hagerman Fossil Beds National Monument headquarters, located 40 miles from the Minidoka site in Hagerman, ID. Hagerman Fossil Beds provides support to Minidoka for administration, operations, and planning efforts. The second comparable unit is Eugene O'Neill National Historic site in Danville, CA, which was established as a memorial to Nobel Prize-winning playwright Eugene O'Neill and a park for the performing arts and related education programs. Eugene O'Neill NHS shares administrative staff and resources with three other park units located in the East San Francisco Bay Area. These parks include Rosie the Riveter World War II Homefront National Historical Park, Port Chicago Naval Magazine National Memorial, and John Muir National Historic Site. Similarly, Muir Woods National Monument, established in 1908 to protect an uncut stand of old-growth redwood, receives operational and administrative support from the Golden Gate National Recreation Area, headquartered in San Francisco, CA.

Operational and visitation information for World War II Valor in the Pacific National Monument, Pearl Harbor is also provided because this national park unit would likely support operations at Honouliuli. It is also likely that some percentage of visitors to Pearl Harbor would also visit Honouliuli, which is currently interpreted through exhibits on display at the national monument.

Visitation numbers are also provided for comparison purposes. It should be noted that visitation at Minidoka National Historic Site is much lower than visitation at Manzanar National Historic Site, an internment camp in southern California. This is primarily because Minidoka National Historic Site is still in the process of developing facilities to accommodate visitors on site.

Staffing requirements for the Honouliuli National Historic Site or National Monument would depend upon the configuration of the site. Staffing approaches are described in Chapter 6: Alternatives. Based on evaluation of comparable park units, the annual operating base budget for the NPS could ranges from $450,000 to $750,000. More specific operational costs would be identified through completion of a management plan for the site.

Table 5-1: Operating Budgets for Comparable and Related National Park Units (FY 2012)				
National Park Unit	*FTE (Full Time Equivalent) Staff*	*Acres*	*Annual Visitation*	*FY2012 NPS Annual Operating Budget*
Muir Woods National Monument	13	554	972,300	$446,000
Eugene O'Neill	8	13	2,800	$687,000
Minidoka National Historic Site	3	201	4,060*	$438,000
Manzanar National Historic Site	16	814	72,831	$1,309,000
World War II Valor in the Pacific National Monument, Pearl Harbor	30	59	1,751,200	$3,529,00
Source: (NPS 2013) * Data is from 2010, updated information is pending				

Conclusion—Costs

With support from World War II Valor in the Pacific National Monument at Pearl Harbor, operational costs for establishing a national park unit appear to be feasible. Land acquisition costs would be minimal and limited to the administrative costs associated with a land transfer to the NPS. Cost would also be incurred from developing the infrastructure necessary to support public access to the site.

Feasibility Conclusion

This study finds that Honouliuli Internment Camp is feasible as an addition to the national park system conditional upon securing public access to the site. Current land use, ownership patterns, and zoning associated with the Honouliuli Internment Camp are compatible with management of a national park unit. Primary resources associated with the historic site are located on property owned by the Monsanto Company, which has expressed interest in donating the property to the NPS. There are exceptional opportunities for public enjoyment of the site provided that public access can be secured from neighboring landowners. An appropriate boundary configuration would include the historic camp area and would allow for access and visitor facilities such as parking. Costs for establishing a national park unit at Honouliuli Gulch are feasible provided that the national park unit would be supported with operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor.

The U.S. Immigration Station complex is not feasible as a national park unit because of existing uses by the U.S. Department of Homeland Security and the Hawai'i State Department of Health. However, if the U.S. Immigration Station facilities were no longer needed by the U.S. Department of Homeland Security or the Hawai'i State Department of Health, additional NPS analysis would be needed to determine the feasibility of management options and associated costs. Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration. The public enjoyment potential of the facilities is high given its accessible and prominent location in downtown Honolulu.

Table 5-2: Feasibility Analysis, Summary Table	
Feasibility Factors	*Issues and Conclusions*
Land use, current and potential site uses, ownership patterns, planning and zoning	Current land use, ownership patterns, and zoning associated with Honouliuli Internment Camp would support NPS management of a national park unit. Existing use of the U.S. Immigration Station complex by the U.S. Department of Homeland Security and Hawai'i State Department of Health make it incompatible with NPS management as part of a national park unit. If the U.S. Immigration Station buildings were no longer used by the U.S. Department of Homeland Security or the Hawai'i State Department of Health, additional NPS analysis would be needed to determine the feasibility of management options and associated costs. Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration.
Access and public enjoyment potential	There is a high potential for public enjoyment at Honouliuli Internment Camp. However, public visitation to the site is only feasible if public access to the site can be secured. Site improvements to provide for vehicle access, parking, trails/walkways, interpretative features, and other facilities would also be necessary. Currently, public access to the U.S. Immigration Station buildings is not feasible.
Boundary size and configuration	Honouliuli Internment Camp and the U.S. Immigration Station sites each provide for the inclusion and protection of nationally significant resources associated with the incarceration and internment of civilians, alien residents, and prisoners of war in Hawai'i during World War II. Both sites include sufficient surrounding area to provide a proper setting for the resources and opportunities for visitor services and facilities.
Existing resource degradation and threats to resources	There are no current threats to Honouliuli Internment Camp that would preclude management of either site as a unit of the national park system. The historic site contains resources with integrity sufficient for national historic landmark designation and national park unit designation. The U.S. Immigration Station buildings appear to be in excellent condition with high levels of historic integrity. However, additional analysis would be needed to determine whether any threats or resource degradation would preclude NPS management.
Public interest and support	Outreach for this study has demonstrated significant public interest and support for a national park unit at Honouliuli in partnership with other organizations and local communities.
Social and economic impact	The social and economic impacts of NPS designation appear to be largely beneficial and would support the feasibility of NPS designation.
Costs associated with operation, acquisition, development, and restoration	Costs for establishing a national park unit at Honouliuli Gulch appear to be feasible, provided that national historic site or national monument would be supported with operational capacity at World War II Valor in the Pacific National Monument. Partnership opportunities could also be pursued to support NPS operations and programs.

Determination of Need for NPS Management

The need for direct NPS management is the final criterion for evaluating resources for potential designation as a new unit of the national park system. The criterion requires a finding that NPS management would be superior to alternative management arrangements by other entities.

Evaluation of the need for NPS management pertains to those resources that are determined to be nationally significant, suitable, and feasible for inclusion in the national park system. Based on these findings, the need for NPS management focuses on Honouliuli Internment Camp. Associated sites would continue to be owned and operated by nonprofit organizations, private property owners, and other government agencies. The owner of the Honouliuli site, the Monsanto Company, has expressed interest in donating the site to the United States for its long-term preservation. Other organizations have not been identified that would be willing to take on direct ownership and management of the site for public use, or to which Monsanto would be willing to transfer the site.

The incorporation of Honouliuli Internment Camp into the national park system would offer a visitor experience that allows the broadest understanding of the resources and stories relating to the internment of Japanese Americans and European Americans in Hawai‘i during World War II. NPS planning and research capabilities, as well as historic preservation, cultural resource management and interpretive and educational programming expertise, would offer superior opportunities for the site to be preserved and interpreted.

In addition, NPS partnerships with organizations and private property owners of the associated sites would provide enhanced opportunities for interpretation and coordinated site management. Development and cooperative management of interpretive programs and comprehensive visitor services with the NPS would be beneficial.

NEED FOR NPS MANAGEMENT CONCLUSION

The NPS finds that there is a need for NPS management in partnership with others to fully protect resources and to enhance visitor appreciation of the nationally significant resources and important stories associated with the Honouliuli Internment Camp. The incorporation of Honouliuli Internment Camp into the national park system would offer a visitor experience that allows the broadest understanding of the resources and stories relating to the internment of Japanese Americans and European Americans in Hawai‘i during World War II. Although local organizations have been active in pursuing preservation of the historic site, no other agency or organization has been identified that could take on direct management and ownership for public enjoyment and long-term conservation of the resources.

6 ALTERNATIVES

Participants, Honouliuli Internment Camp Field Study, July 2010. Photo: Valentino Valdez.

CHAPTER 6: ALTERNATIVES

This chapter describes the range of management alternatives analyzed in the study.

Introduction

The legislation authorizing this study directs the NPS to determine whether any of the sites evaluated meet the criteria for inclusion in the national park system and the appropriate methods for preserving and interpreting such sites. The methods for management are described as alternatives for the purposes of this study.

Overview of the Alternatives

The study team developed two alternatives for the draft study report/environmental assessment (EA), based on information gathered from public and stakeholder input, internal NPS discussions, evaluation of special resource study criteria, historical research, and NPS management models. The two alternatives considered include a "No Action" alternative, which serves as a baseline for comparison, and an "action" alternative, which is also the preferred alternative.

- **Alternative A**: Continuation of Current Management (No Action)

- **Alternative B**: Honouliuli National Historic Site or National Monument—A Unit of the National Park System

For each alternative there is a description of the overall concept and key elements of the alternative, including management approaches, resource protection, visitor services, and the role of organizations and public agencies. Maps of the alternatives are included to illustrate the alternatives.

The Selected Alternative

NATIONAL HISTORIC SITE OR NATIONAL MONUMENT—A NEW UNIT OF THE NATIONAL PARK SYSTEM

The recommendations encompassed in the selected alternative are the same as those identified and analyzed in alternative B in the draft study report/EA, with the exception of modifications made as a result of information and comments derived from public review of the draft study report/EA, as follows:

- The proposed national historic site or monument boundary has been reduced at the request of the University of Hawai‘i. Discussions between the NPS and the University of Hawai‘i have identified approaches to public access that do not require inclusion of University of Hawai‘i land in an NPS boundary at this time. The University of Hawai‘i is committed to working with the NPS on granting access to the site over university lands should a national park unit be established. Future road access could be added to the national historic site or monument boundary once a more permanent road alignment has been determined.
- Minor modifications have also been made to address concerns regarding universal access to the site, potential partnerships, and technical assistance opportunities.

The above modifications would not constitute a change in environmental impacts beyond what was analyzed in the environmental assessment.

Management Alternatives No Longer Under Consideration

Two alternative approaches to preservation and interpretation of sites were initially considered: a national park unit consisting of all the sites contributing to the World War II incarceration and internment history in Hawai‘i, and a national affiliated area for Honouliuli Internment Camp that would be owned and operated by a private nonprofit. A national park unit consisting of all of the sites evaluated in this study was dismissed because only two sites met the NPS criteria for national significance, and only one site, Honouliuli Internment Camp, met NPS criteria for significance, suitability, and feasibility. Affiliated area status for Honouliuli Internment Camp was dismissed from consideration because no organization was identified that would be able to take on direct management of the site.

Description of the Alternatives

ALTERNATIVE A: CONTINUATION OF CURRENT MANAGEMENT (NO ACTION ALTERNATIVE)

Concept: Sites, organizations, and programs significant to the internment history in Hawai'i would continue to operate independently by existing landowners, agencies, or organizations without additional NPS management or assistance other than what is currently available through existing authorities and grant programs.

Definition

Under a "no action" alternative, current management of resources would continue. Existing programs and policies of federal, state, county, and nonprofit organizations would remain in place.

Management of Sites Related to Internment in Hawai'i

Local organizations and institutions have been active in documentation, preservation, and interpretation efforts for Honouliuli Internment Camp. The Japanese Cultural Center of of Hawai'i (JCCH) has conducted extensive research and uncovered the location of Honouliuli Internment Camp and other related sites. The JCCH maintains the largest repository of archives and collection items related to Honouliuli and the internment history in Hawai'i. University of Hawai'i—West O'ahu faculty and students have also played a significant role in researching the history of Honouliuli and conducting archeological surveys. In 2012, the Hawai'i State Legislature commissioned an advisory group, called the Honouliuli Park Site Advisory Committee, to support preservation of the Honouliuli site. The advisory group was directed to: 1) provide state support toward preservation of the Honouliuli site; 2) establish a mechanism to leverage county, state, federal, and private funding for an educational resource center at the site; and 3) memorialize the struggle for civil rights by Hawai'i's people

Sites related to World War II internment in Hawai'i would continue to be managed separately by their public and private landowners. With the exception of the Kilauea Military Camp at Hawai'i Volcanoes National Park, there would be no NPS staffing or operational support at sites identified in the study other than technical assistance under existing authorities if requested. Organizations and programs devoted to commemorating and preserving Hawai'i's internment history would continue to operate independently without NPS management or assistance other than that available through existing authorities. Table 6-1: Existing Management of Sites Evaluated in the Study includes a summary of current management and visitor opportunities for each of the sites evaluated in the study.

Honouliuli Internment Camp

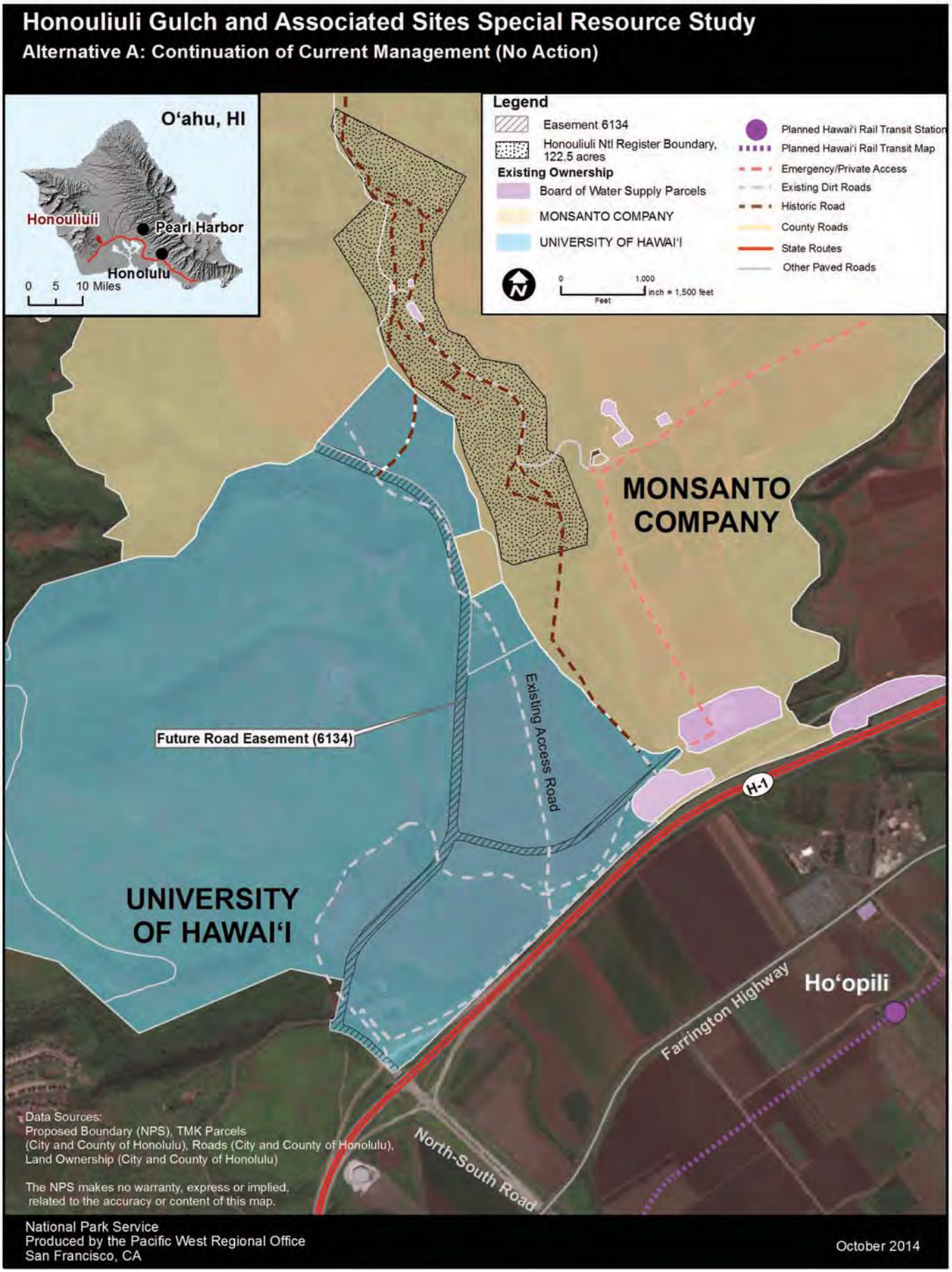
Under the no action alternative, Honouliuli Internment Camp would remain in private ownership and would continue to be inaccessible to the general public. Interest by the existing landowner, public agencies, educational institutions, nonprofit organizations, and individuals may result in additional opportunities to interpret the site (See Map: Alternative A—Continuation of Current Management).

Although the site would not be managed expressly to provide visitor opportunities, existing landowners may continue to allow the Japanese Cultural Center of Hawai'i's (JCCH) site tours and educational activities on occasion when permission is granted by the landowner. The University of Hawai'i—West O'ahu (UHWO) would continue to conduct field schools at Honouliuli Internment Camp, as allowed by the current landowner.

Other Associated Sites

Sites identified as potentially eligible for national historic landmark (NHL) nomination or nomination to the National Register of Historic Places (NRHP) would continue to be owned by various public and private entities. These sites would continue to function for private and public uses, most of which are not related to World War II internment history. Interpretation and conservation of such sites would be uncoordinated and at the discretion of the current landowner.

Partner organizations and agencies would take the lead in developing interpretation and education materials and visitor opportunities.


Honouliuli Gulch and Associated Sites Special Resource Study
Alternative A: Continuation of Current Management (No Action)
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
Easement 6134
Honouliuli Ntl Register Boundary, 122.5 acres
Existing Ownership
Board of Water Supply Parcels
MONSANTO COMPANY
UNIVERSITY OF HAWAI'I
Planned Hawai'i Rail Transit Station
Planned Hawai'i Rail Transit Map
Emergency/Private Access
Existing Dirt Roads
Historic Road
County Roads
State Routes
Other Paved Roads
0 1,000
Feet
inch = 1,500 feet
MONSANTO COMPANY
Future Road Easement (6134)
Existing Access Road
H-1
UNIVERSITY OF HAWAI'I
Farrington Highway
Ho'opili
North-South Road
Data Sources:
Proposed Boundary (NPS), TMK Parcels
(City and County of Honolulu), Roads (City and County of Honolulu),
Land Ownership (City and County of Honolulu)
The NPS makes no warranty, express or implied,
related to the accuracy or content of this map.
National Park Service
Produced by the Pacific West Regional Office
San Francisco, CA
October 2014

Such opportunities would occur at locations such as the JCCH.

Resource Protection

The primary responsibility for preserving nationally significant and associated sites would fall to the current owners and managers of those sites. Resource protection would be voluntary and dependent upon property owners' initiative.

Sites in federal ownership would be managed in compliance with the National Historic Preservation Act (U.S. Immigration Station, Kilauea Military Camp). Sites not in federal ownership and currently listed in the National Register of Historic Places, such as the Honolulu Police Department, Yokohama Specie Bank, Kaua'i County Courthouse, and Maui County Courthouse and Police Station, would have some opportunities for technical assistance and grants for preservation.

For sites not listed on the NRHP nor protected by local preservation ordinances, any efforts for preservation would be at the discretion of existing landowners. Resources could suffer from a loss of integrity due to changes in use or ownership in accordance with local planning and zoning ordinances over time. Existing owners may also lack funding to maintain or preserve sites.

Visitor Experience

Organizations that provide visitor opportunities to learn about the internment history could continue to provide such opportunities. The JCCH could continue to provide visitor opportunities at the annual pilgrimage to Honouliuli, if the property owner was willing. Hawai'i Volcanoes National Park could provide interpretation at Kilauea Military Camp in coordination with the U.S. Army. World War II Valor in the Pacific National Monument at Pearl Harbor would continue to interpret the internment experience in Hawai'i as one component of the larger Pacific War story that it is mandated to convey.

Most other associated sites identified as significant to internment in Hawai'i are not managed expressly to provide visitor opportunities to learn about or experience these sites.

Japanese American Confinement Sites (JACS) Grant Program

Honouliuli Internment Camp and other associated sites would continue to be eligible for grants through the Japanese American Confinement Sites (JACS) Grant Program. Public Law 109-441 (16 USC 461) established the JACS Grant Program for the preservation and interpretation of U.S. confinement sites where Japanese Americans were incarcerated during World War II. The law authorized up to $38 million for the life of the grant program to identify, research, evaluate, interpret, protect, restore, repair, and acquire historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the nation's commitment to equal justice under the law.

Grants are awarded to organizations and entities working to preserve historic Japanese American confinement sites and their history, including private nonprofit organizations; educational institutions; state, local, and tribal governments; and other public entities. Grants are awarded through a competitive process and require a two-to-one federal to non-federal match ($2 federal to $1 non-federal). Since its establishment in 2006, the JACS Grant Program has awarded more than $15 million in grants as of fiscal year 2014. To date, JCCH has received five grants totaling $375,700. Projects funded include a documentary film, educational tours, a youth program, traveling exhibits, and multimedia virtual tours. The University of Hawai'i has received four grants to date, totaling $168,700. Projects funded include collection of oral histories, archival research, and archeological field schools. California-based CyArk received a grant of $39,020 to digitally document Honouliuli. Under the no action alternative, organizations would continue to apply for JACS grants for the life of the program.

Operations

Operations and maintenance of existing sites would be assumed to remain at existing levels. With the exception of Kilauea Military Camp in Hawai'i Volcanoes National Park, there would be no NPS staffing or operational responsibilities at nationally significant or potential NHL or NRHP sites associated with internment in Hawai'i.

Table 6-1: Existing Management of Sites Evaluated in the Study			
Site	*Site Type*	*Ownership and Management*	*Current Visitor Opportunities or Interpretation*
Nationally Significant Sites			
Honouliuli Internment Camp	Primary, O‘ahu	Private	Currently not accessible to the general public. Site tours and use for educational purposes occur on occasion with landowner permission.
U.S. Immigration Station	Primary, O‘ahu	Public, Department of Homeland Security and Hawai‘i State Department of Health	None. Currently not accessible to the general public.
Sites Listed or Potentially Eligible for Listing in the National Register of Historic Places			
Honolulu Police Department	Secondary, O‘ahu	Public, City and County of Honolulu	None
Kaua‘i County Courthouse	Secondary, Kaua‘i	Public, County of Kaua‘i	None
Kilauea Military Camp	Primary, Island of Hawai‘i	Public, National Park Service	Active military recreation camp. However, opportunities for interpretation exist.
Yokohama Specie Bank	Secondary, O‘ahu	Private	None
Lāna‘i City Jail and Courthouse	Secondary, Lāna‘i	Private	None
Potentially Significant Sites—Additional Research Needed			
Waiākea Prison Camp	Secondary, Island of Hawai‘i	Private	None
Hilo Independent Japanese Language School	Secondary, Island of Hawai‘i	Unknown	None
Līhu‘e Plantation Gymnasium	Secondary, Kaua‘i	Privately-owned structure adjacent to Isenberg Park	None
Kalāheo Stockade	Primary, Kaua‘i	Private	None
Ha‘ikū Military Camp	Secondary, Maui	Private	None
Maui County Courthouse and Police Station	Secondary, Maui	Public, Maui County	None
Other Related Sites—No Integrity Remaining			
Sand Island Detention Camp	Primary, O‘ahu	Public, State of Hawai‘i	None/Non-Extant
Wailua Jail	Primary, Kaua‘i	Public	None/Non-Extant
Waimea Jail	Primary, Kaua‘i	Public	None/Non-Extant
Kaunakakai Jail and Courthouse	Secondary, Moloka‘i	Public	None/Non-Extant
Maui County Jail	Primary, Maui	Public, Maui County	None/Non-Extant

"Primary" sites are those that housed at least 10 prisoners, generally for more than several weeks. "Secondary" sites are those that were used as prisons for fewer prisoners, usually for shorter periods of time. Also included in the "secondary" category are sites where no internees were imprisoned, but where activities related to the internment occurred, such as hearings. Note: The Honolulu Police Department was inadvertently omitted from the printed versions of this table in the newsletter and draft report.

ALTERNATIVE B (SELECTED ALTERNATIVE): HONOULIULI NATIONAL HISTORIC SITE OR NATIONAL MONUMENT—A NEW UNIT OF THE NATIONAL PARK SYSTEM

Concept: Congress would establish Honouliuli National Historic Site as a new unit of the national park system. Alternatively, a national monument managed by the National Park Service could be established. The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that would allow for access and visitor facilities. In collaboration with partners, the National Park Service would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai‘i during World War II. The national historic site or monument would be supported by operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor. The National Park Service could respond to requests to provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai‘i during World War II.

Definition

A national historic site usually contains a single historical feature that is directly associated with its subject. National historic sites preserve places and commemorate persons, events, and activities important in the nation's history. Examples of national historic sites include Minidoka in Idaho and Manzanar in California, both of which protect resources related to the mainland incarceration of Japanese Americans during World War II. A national monument is intended to preserve at least one nationally significant resource. It is usually smaller than a national park and lacks its diversity of attractions.

National park units are typically established by an act of Congress. However, the Antiquities Act of 1906 gives the President of the United States the authority to establish national monuments on federally owned lands.

Proposed Area

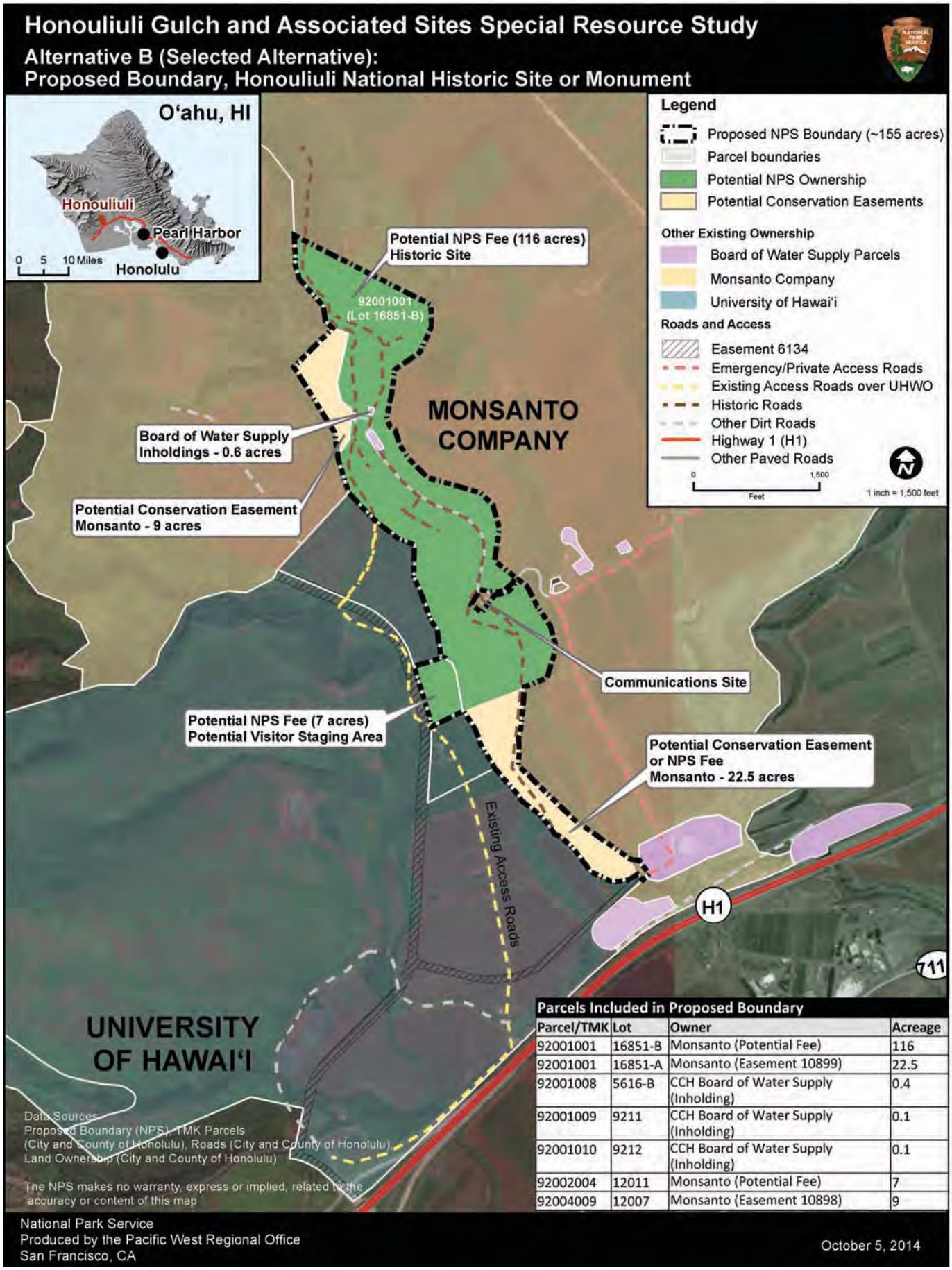
The Honouliuli National Historic Site or National Monument would total approximately 155 acres. The historic Honouliuli Internment Camp and the adjacent overlook parcel (totaling approximately 123 acres) would be acquired by the NPS through a donation by the Monsanto Company. Additional Monsanto-owned lands (31.5 acres) with related resources could be protected through conservation easements, land transfer, or other measures at Monsanto's discretion. All private property rights would be respected.

The University of Hawai‘i has committed to providing the NPS with public access to Honouliuli, initially through granting the NPS a right of entry over existing roads from the west. The University of Hawai‘i is currently undergoing planning efforts for its lands adjacent to Honouliuli. This process and subsequent planning by the NPS should a national park unit be established may identify a new road alignment for public access. Once a desired road alignment for public access has been determined, this road alignment could be included in the national historic site or national monument through a boundary adjustment. This would allow the National Park Service to expend funds on the development maintenance of the access road.

Three parcels owned by the City and County of Honolulu Board of Water Supply (totaling 0.6 acres) would be inholdings within the proposed area and would remain under current ownership and management. The communications facilities, non-contributing features within the historic site, would not be included in the proposed boundary.

Management

The NPS would have direct management responsibility for the Honouliuli National Historic Site or National Monument including: 1) interpretation and education associated with the Honouliuli Internment Camp and its resources, including the development of interpretive media and programs; 2) preservation and resource management for the historic site; and 3) operational facilities and infrastructure such as roads, restrooms, and trails.



Parcels Included in Proposed Boundary

Parcel/TMK	Lot	Owner	Acreage
92001001	16851-B	Monsanto (Potential Fee)	116
92001001	16851-A	Monsanto (Easement 10899)	22.5
92001008	5616-B	CCH Board of Water Supply (Inholding)	0.4
92001009	9211	CCH Board of Water Supply (Inholding)	0.1
92001010	9212	CCH Board of Water Supply (Inholding)	0.1
92002004	12011	Monsanto (Potential Fee)	7
92004009	12007	Monsanto (Easement 10898)	9

Resource Protection

NPS staff would protect and preserve resources related to Honouliuli Internment Camp. Management plans would guide appropriate historic preservation documentation and treatments. As described below, there are opportunities to partner with local institutions and organizations in the protection of resources.

Visitor Experience

Visitors would have opportunities to learn about Honouliuli Internment Camp, World War II internment in Hawai‘i, martial law, civil liberties, and peace and reconciliation through a wide variety of interpretive and educational programs onsite and at offsite locations. Interpretation would be accessible and relevant to diverse audiences and multiple generations. Virtual visitor experiences would be explored so that people could learn about and experience Honouliuli and related sites without actually visiting the sites. Programs could be provided by NPS rangers, partners, and volunteers. Information could be presented in multiple languages.

Partnerships

Other entities, specifically the University of Hawai‘i—West O‘ahu and the Japanese Cultural Center of Hawai‘i, have done significant work to document, preserve, and interpret the Honouliuli Internment Camp and the larger history of internment in Hawai‘i during World War II. The NPS would seek to maintain these partnerships for future management of the Honouliuli National Historic Site or Monument. In addition, the NPS would explore, develop, and maintain new partnerships for the preservation and interpretation of Honouliuli Internment Camp and related sites, features, and stories in Hawai‘i.

There are substantial opportunities for partnerships related to Honouliuli National Historic Site or Monument with public agencies, educational institutions, nonprofit entities, and individuals. Potential partnership projects are numerous and could include the development of educational programs, development of facilities, resource stewardship activities such as preservation of historic features and vegetation clearing, and research projects. Partnerships could also include shared facilities for interpretation, curatorial storage, operations, and maintenance.

Technical Assistance

World War II-era internment and incarceration sites in Hawai‘i other than Honouliuli Internment Camp would continue to be owned and managed by their respective public and private owners. Any recognition or technical assistance related to the associated sites would be voluntary on the part of the landowner. The associated sites illustrate the broad-reaching effects of internment on the six major islands in Hawai‘i and are valuable in accurately interpreting this history.

Upon request, the NPS could work cooperatively with associated site owners and managers to explore opportunities for interpretation and/or preservation of the associated sites. Any request for technical assistance related to the associated sites would be voluntary on the part of the landowner.

Where appropriate, the NPS could also conduct research and respond to requests for assistance to related sites that have yet to be identified.

OPERATIONS

Staffing

Honouliuli National Historic Site or Monument would be managed through World War II Valor in the Pacific National Monument at Pearl Harbor, given its close proximity and related history. Some staff positions at World War II Valor in the Pacific National Monument would be shared. However, management of the site would require additional staff as funding became available. A management plan would identify priorities, management emphases, and required staffing for a 15 to 20 year timeframe.

Based on comparisons of staffing levels for existing national historic sites of similar scale and management models, the following types of staff would be recommended:

- Site manager
- Cultural resource specialist
- Interpretive specialist
- Interpretive ranger (2)
- Law enforcement ranger

- Maintenance (2)
- Exotic plant management technician

Positions could be permanent, temporary, or seasonal. In addition, partner organizations could provide staff or volunteers, with types and numbers dependent upon the functions provided.

Operational and Visitor Facilities

Comprehensive management planning would guide the development of facilities for Honouliuli National Historic Site or National Monument. Facilities would be needed to support public access, circulation, orientation, and learning about the history of internment in Hawai'i. The 7-acre overlook site could serve as a visitor staging area with ample space to provide for parking, visitor drop-off, interpretive features, and restrooms. The site is located just outside of the historic camp and offers views to Pearl Harbor, downtown Honolulu, and Diamond Head. Within the gulch, visitor facilities would be minimal to preserve the site's historic integrity. Facilities might include trails, interpretive waysides, primitive roads, and vault toilets. Implementation planning would also explore opportunities for persons of all abilities to access and experience Honouliuli Internment Camp.

Currently there is no public access to Honouliuli Internment Camp. Rights of access would be required to provide public access to the 7-acre overlook parcel and the historic site. Existing roads would require considerable improvement to accommodate visitor access. As noted above, the University of Hawai'i has indicated its commitment to working with the National Park Service with regard to providing public access on existing and future roads through its lands.

Japan America Society tour of Honouliuli in 2012. Photo: University of Hawai'i—West O'ahu Archeological Field School.

The Federal Highway Administration (FHA) estimated construction costs for public and administrative access using existing road alignments would range from $3 to $ 20 million. This dollar amount would also include parking and turnaround areas for buses. The higher end of the range would be incurred if additional reconstruction or realignment is necessary for road improvements. Costs would need to be reevaluated after a formal site survey and through completion of a comprehensive management plan.

Shuttle or bus service from either World War II Valor in the Pacific National Monument or UHWO was also evaluated by the FHA. Costs to operate a bus connection from World War II Valor in the Pacific National Monument three times per week were estimated at $25,000 to $30,000 annually. Costs to operate a bus or shuttle from University of Hawai‘i—West O‘ahu twice daily were estimated at $91,000 to $112,000 annually.

NPS management of a national historic site at Honouliuli Gulch would be funded through federal appropriations as part of the annual NPS budget and through potential partners and grants. The national historic site or monument could share administrative, visitor, and operational facilities with World War II Valor in the Pacific National Monument or partner entities.

Non-federal entities would continue to be eligible for the grants through the Japanese American Confinement Sites Grant Program for preservation, interpretation, and documentation projects associated with Honouliuli Internment Camp.

Based on the size and scope of this site, and the types of services and assistance proposed, the annual cost of NPS operations for the national historic site could be expected to be $400,000 to $750,000. The estimated operational budget would primarily fund NPS staff, programs, projects, and outreach.

Specific costs would be reevaluated in subsequent, more detailed planning for the unit. Planning would consider facility and site design, detailed identification of resource protection needs, and changing visitor expectations. Actual costs to the NPS would vary depending on timing and implementation and contributions by partners and volunteers. It is assumed that the long-range financial needs of Honouliuli National Historic Site or Monument would not just rely upon federally appropriated funds. A variety of other public and private funding sources could be sought by the NPS to assist in implementation efforts. Other NPS units have successfully found partners to help with funding major projects, and some of the costs associated with actions in the alternatives may prove to be less expensive if donated materials, labor, and other support can be secured.

Chinese banyan tree, Honouliuli. Photo: NPS, 2011.

CHAPTER 7: ENVIRONMENTAL CONSEQUENCES

Analysis of the environmental impacts associated with the study alternatives.

Introduction

NPS policy requires that a special resource study be accompanied by an environment compliance document that is prepared in accordance with the requirements of the National Environmental Policy Act (NEPA), its implementing regulations (36 CFR 1500-1508), and Director's Order #12, *Conservation Planning, Environmental Impact Analysis, and Decision-Making* (2011).

Since a special resource study presents management alternatives at a broad level, an accompanying environmental assessment is also performed at a broad or general level. If the site is designated for ownership and management by the NPS, more detailed planning and analysis through a management planning process would result.

The National Environmental Policy Act requires that environmental documents disclose the environmental impacts of the proposed federal action, reasonable alternatives to that action, and any adverse environmental effects that cannot be avoided should the proposed action be implemented. This section analyzes the environmental impacts of project alternatives on affected resources. This analysis provides the basis for comparing the effects of the alternatives. NEPA requires consideration of context, intensity and duration of impacts, indirect impacts, cumulative impacts, and measures to mitigate impacts. Impact analysis for historic properties is based on National Historic Preservation Act (36 CFR Part 800) criteria of effect as detailed below.

The first part of the chapter discusses the methodology used to identify impacts and includes definitions of terms. The impact topics are then analyzed with reference to each of the alternatives. The discussion of each impact topic includes a description of the beneficial and adverse effects of the alternatives, a discussion of cumulative effects, if any, and a conclusion.

IMPACT TYPE

The impact type classifies the effects as beneficial or adverse and direct or indirect.

Beneficial: A change that improves the condition or appearance of the resource or a change that moves the resource toward a desired condition.

Adverse: A change that would deplete or detract from the condition or appearance of the resource or a change that moves the resource away from a desired condition.

Direct: An effect that is caused by an action and occurs in the same time and place.

Indirect: An effect that is caused by an action but is later in time or farther removed in distance, but is still reasonably foreseeable.

CONTEXT

The context describes the area or location in which the impact will occur.

Site Specific: Impacts would occur at the location of the action.

Localized: Impacts are limited in extent and would occur in the vicinity of the site being discussed.

Regional or Widespread: Impacts would occur across an area or habitat, such as affecting the resource within a watershed or park unit (beyond the boundary of the site being discussed). Widespread impacts are often detectable on a landscape or regional scale.

DURATION

Describes the length of time an effect will occur, either short-term or long-term:

Short-term impacts generally last only during construction, and the resources resume their pre-construction conditions following construction. Short-term impacts are often quickly reversible and associated with a specific event and may last from one to five years.

Long-term impacts last beyond the construction period, and the resources may not resume their pre-construction conditions for a longer period of time following construction. Long-term impacts may be reversible over a

much longer period, or may occur continuously based on normal activity, or for more than five years.

INTENSITY

Intensity describes the degree, level, or strength of an impact. For this analysis, intensity has been categorized into negligible, minor, moderate, and major. Beneficial impacts are described but are not assigned intensity levels.

Negligible: Measurable or anticipated degree of change would not be detectable or would be only slightly detectable and localized.

Minor: Impacts would be slightly detectable or localized within a small portion of the project area.

Moderate: Impacts would be measurable or an anticipated degree of change is readily apparent and appreciable. They may be localized or widespread and would be noticed by most people.

Major: Impacts would be substantial, highly noticeable, and widespread. Changes to the character of the landscape would occur.

REDUCING THE LEVEL OF IMPACTS

To reduce their occurrence or intensity, impacts may be avoided, minimized, or mitigated. Managers may:

Avoid conducting management activities in an area of the affected resource,

Minimize the type, duration, or intensity of the impact to an affected resource, or

Mitigate the impact by:

- Repairing localized damage to the affected resource immediately after an adverse impact.
- Rehabilitating an affected resource with a combination of additional management activities.
- Compensating a major long-term adverse direct impact through additional strategies designed to improve an affected resource to the degree practicable.

CUMULATIVE IMPACT SCENARIO

The Council on Environmental Quality (CEQ) regulations, which implement the National Environmental Policy Act of 1969 (42 USC 4321 et seq.), require assessment of cumulative impacts in the decision-making process for federal projects.

The CEQ describes a cumulative impact as follows (Regulation 1508.7):

> A "cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The cumulative projects addressed in this analysis include past and present actions, as well as any planning or development activity currently being implemented or planned for implementation in the reasonably foreseeable future. Cumulative actions are evaluated in conjunction with the impacts of an alternative to determine if they have any additive effects on a particular resource. Because most of the cumulative projects are in the early planning stages, the evaluation of cumulative impacts was based on a general description of the project. Ongoing or reasonably foreseeable future projects were identified for the surrounding area.

The geographic scope for the cumulative impacts analysis is Honouliuli Gulch and adjacent areas. It is difficult to determine cumulative impacts for the associated sites given the range of locations and property owners.

Projects Included in the Cumulative Effects Analysis for this Environmental Assessment

University of Hawai'i—West O'ahu (UHWO)

The University of Hawai'i recently developed a regional plan for a new campus in West O'ahu south of the H-1 Freeway and south of the Monsanto property and Honouliuli site. Construction of the new university has been

underway for two years and will likely continue into the next decade. The University also owns the parcel adjacent to Honouliuli known as the UHWO Mauka parcel and has indicated that master planning for the Mauka parcel will be initiated in the near future. There will be opportunities for the NPS and UHWO to work together in developing plans for adjoining properties.

Honolulu Rail Transit Project

The Honolulu Rail Transit Project is a 20-mile elevated rail line that will connect west O'ahu with downtown Honolulu and, ultimately, the University of Hawai'i's Manoa Campus. The Honolulu Authority for Rapid Transportation and the U.S. Federal Transit Administration have completed major planning phases of the project, with some construction already initiated in the UHWO area. The rail system, once completed, has the potential for transporting visitors from the primary visitor lodging areas in Waikiki to the UHWO area, enhancing access to Honouliuli Gulch.

Monsanto Company Hawai'i Agricultural Research Facility

The Monsanto Company operates seed research, development, and manufacturing on several hundred acres of land immediately adjacent to Honouliuli Gulch. The Monsanto Company owns the Honouliuli Gulch property but does not utilize the area for agricultural purposes. As an agricultural research facility, Monsanto utilizes both field and laboratory areas for agricultural purposes. These activities include discing and planting fields, installing irrigation systems, and developing erosion control modifications to their field system.

ASSUMPTIONS

Given the broad nature of this study, the impact analysis must also be broad, by necessity, and avoid speculation as to site-specific impacts. The findings of this study will inform a recommendation by the Secretary of the Interior to Congress. If a national park unit is designated, then new environmental analysis would be undertaken prior to specific implementation actions. This planning would propose specific actions, and alternatives to them, whose site or area specific impacts would be assessed prior to plan implementation.

Current economic conditions limit the near-term potential for increased local, state, and federal funding for conservation and historic preservation.

The majority of the analyses in this document addresses the Honouliuli Gulch area in more detail than the other associated sites because Honouliuli Gulch is the area under alternative B (preferred) that would be managed by the National Park Service.

The other associated sites would continue to be managed by existing ownership entities, regardless of which alternative is selected. Under alternative B, the NPS could, with a willing landowner, provide community outreach and technical assistance for the preservation and interpretation of these other locales. A cooperative partnership between the NPS and the private landowners is neither required nor assumed, and the manner in which alternative B's actions could affect these sites is undetermined.

Impact Topics

Specific impact topics were developed to address potential physical, natural, cultural, recreational, and social impacts that might result from the proposed alternatives as identified by the public, NPS, and other agencies and to address federal laws, regulations and executive orders, and NPS policy. Impact topics are the resources of concern that may be affected by the range of alternatives considered in this EA.

An Environmental Screening Form was used to identify initial resources of concern. Environmental Screening Forms were mandated by NPS DO-12: *Conservation Planning, Environmental Impact Analysis and Decision-making*. Comments received from the public during scoping were also considered in the screening process. A brief rationale for the selection or dismissal of each impact topic is provided in Table 7-1 and Table 7-2.

IMPACT TOPICS ANALYZED

Potential impact topics are reviewed here as to their applicability in this analysis. The rationale for this review stems from the essential purpose of an environmental assessment: to determine whether there would be significant impacts requiring the preparation of an environmental impact statement in order to proceed with the action. The dismissal of topics, with rationale, demonstrates there is no concern in those areas.

Table 7-1: Impact Topics Analyzed

Impact Topic Retained	*Discussion and Rationale*
Land Use (including Prime and Unique Farmland)	*Management Policies* (NPS 2006) states: "…the Service will cooperate with federal agencies; tribal, state, and local governments; nonprofit organizations; and property owners to provide appropriate protection measures. Cooperation with these entities will also be pursued, and other available land protection tools will be employed when threats to resources originate outside boundaries." Because the alternatives may affect land use, including ownership, occupancy and activities, land use has been retained as an impact topic. The Farmland Protection Policy Act of 1981, as amended, requires federal agencies to consider adverse effects to prime and unique farmland that would result in the conversion of these lands to non-agricultural uses. Prime or unique farmland is classified by the USDA, Natural Resources Conservation Service and is defined as soil that particularly produces general crops such as common foods, forage, fiber, and oil seed; unique farmland produces specialty crops such as fruits, vegetables, and nuts. Prime farmland is one of several kinds of important farmland defined by the USDA. It is of major importance in meeting the nation's short- and long-range needs for food and fiber. Because the supply of high-quality farmland is limited, the USDA recognizes that responsible levels of government, as well as individuals, should encourage and facilitate the wise use of our nation's prime farmland. ALISH (Agricultural Lands of Importance to the State of Hawai'i) is a Hawai'i state classification system that identifies agriculturally important lands and is intended to provide decision makers with a tool for use in agricultural preservation, planning, and development.The criteria for classification of prime agricultural land are identical to the criteria established by Soil Conservation Service, U.S. Department of Agriculture for national application. The criteria for unique agricultural and other important agricultural lands were established cooperatively by the Soil Conservation Service in Hawai'i, the College of Tropical Agriculture, and the State Department of Agriculture. Based on planning maps available through the State of Hawai'i Office of Planning website, areas immediately adjacent to Honouliuli Gulch are considered prime farmland. The potential for an introduction of visitors to an area surrounded by ALISH lands may present an impact to agricultural operations, therefore this topic has been retained.
Water Resources (Water Quality and Hydrology)	*Management Policies* (NPS 2006) provides direction for the preservation, use, and quality of water in national parks. Minor construction projects have the potential to contaminate ground and/or surface water and may have impacts to streams, including water quality. Potential effects to hydrology could also occur from the construction of structures, such as culverts or bridges; therefore this topic has been retained. The Honolulu Board of Water Supply maintains wells and pumping/storage facilities in and immediately adjacent to the Honouliuli Gulch site. Potential effects to hydrology could occur from the construction of structures, such as culverts or bridges. Therefore this topic has been retained.

Table 7-1: Impact Topics Analyzed	
Impact Topic Retained	*Discussion and Rationale*
Vegetation	NEPA calls for examination of the impacts on the components of affected ecosystems. *Management Policies* (NPS 2006) calls for protecting the natural abundance and diversity of park native species and communities, including avoiding, minimizing or mitigating potential impacts from proposed projects. Potential effects to native vegetation, including the introduction of non-native species, could occur from the construction of roads and/or structures, such as culverts or bridges. Therefore this topic has been retained.
Prehistoric and Historic Archeology	Compliance with the Archeological Resources Protection Act in protecting known or undiscovered archeological resources is necessary. *Management Policies* (NPS 2006) calls for ongoing inventory and analysis of the significance of archeological resources. In addition to the NHPA and *Management Policies*, NPS DO 28B Archaeology affirms a long-term commitment to the appropriate investigation, documentation, preservation, interpretation, and protection of archeological resources within units of the national park system. As one of the principal stewards of America's heritage, the NPS is charged with the preservation of the commemorative, educational, scientific, and traditional cultural values of archeological resources for the benefit and enjoyment of present and future generations.
Historic Structures/ Cultural Landscapes	Consideration of the impacts to cultural resources is required under provisions of Section 106 of the NHPA as amended, and the 2008 *Programmatic Agreement among the National Park Service, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation* (ACHP). It is also required under NPS *Management Policies 2006*. Federal land management agencies are required to consider the effects proposed actions have on properties listed in, or eligible for inclusion in, the National Register of Historic Places (i.e., Historic Properties), and allow the ACHP a reasonable opportunity to comment. The National Register is the nation's inventory of historic places and the national repository of documentation on property types and their significance. Agencies are required to consult with federal, state, local, and tribal governments/organizations, identify historic properties, assess adverse effects to historic properties, and negate, minimize, or mitigate adverse effects to historic properties while engaged in any federal or federally-assisted undertaking (36 CFR Part 800). Historic properties may be objects, structures, buildings, or cultural landscapes. Cultural landscapes are settings humans have created in the natural world. They reveal the ties between the people and the land. These ties are based on the need to grow food, build settlements, recreate, and find suitable land to bury their dead. They range from prehistoric settlements to cattle ranches, from cemeteries to pilgrimage routes and are the expressions of human manipulation and adaptation of the land.
Museum Collections	*Management Policies* (NPS 2006) and other cultural resources laws identify the need to evaluate effects on NPS collections if applicable. Requirements for proper management of museum objects are defined in 36 CFR 79.

Table 7-1: Impact Topics Analyzed	
Impact Topic Retained	*Discussion and Rationale*
Visitor Experience	According to *Management Policies* (NPS 2006), the enjoyment of park resources and values by people is part of the fundamental purpose of all park units. The NPS is committed to providing appropriate, high-quality opportunities for visitors to enjoy the parks, and will maintain within the parks an atmosphere that is open, inviting, and accessible to every segment of society. The parks provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks. *Management Policies* (NPS 2006) also states that scenic views and visual resources are considered highly valued associated characteristics that the NPS should strive to protect. Among the impacts that may be considered in this section are visitor access, opportunities and experience, soundscape, and scenic resources as well as interpretation and education. Therefore this topic has been retained for analysis.
Socioeconomics	Socioeconomic impact analysis is required, as appropriate, under NEPA and *Management Policies* (NPS 2006) pertaining to host or gateway communities. The local and regional economy and some business of the communities surrounding the sites may be based on tourism and resource use. Manufacturing, professional services, and education also contribute to regional economies. Because the alternatives, if implemented, could affect local or regional economies, including minority and low-income populations, this impact topic has been retained for additional analysis. Included in socioeconomics is a brief analysis of impacts on minority and low-income populations.

Looking north into Honouliuli Gulch from the proposed administrative access road. Photo: NPS, 2013.

IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS

The topics listed below (Table 7-2) either would not be affected by the alternatives evaluated in this EA, or there would be negligible to minor effects on them. Therefore, these topics have been dismissed from further analysis. Negligible/minor effects are localized effects that would not be detectable over existing conditions or would not have lasting consequences. There would be no apparent change in the resource.

Table 7-2: Impact Topics Dismissed

Impact Topic Dismissed	*Discussion and Rationale*
Federally Listed Species	The Endangered Species Act (ESA) requires an examination of impacts to all federally listed threatened or endangered species. *Management Policies* (NPS 2006) calls for an analysis of impacts to state-listed threatened or endangered species and federal candidate species. Under the ESA, the NPS is mandated to promote the conservation of all federal threatened and endangered species and their critical habitats within the parks. *Management Policies* includes the additional stipulation to conserve and manage species proposed for listing. There are no threatened or endangered species in the area; therefore, this topic has been eliminated from analysis.
Wildlife	NEPA calls for examination of the impacts on the components of affected ecosystems, including terrestrial and aquatic wildlife and fish. NPS policy is to protect the natural abundance and diversity of park native species and communities, including avoiding, minimizing, or mitigating potential impacts from proposed projects. Although potential future actions could have a minor effect on wildlife from disturbance associated with rehabilitation, construction, or visitor use, these site specific impacts are currently unknown and would undergo future environmental analysis. Therefore this topic has been dismissed from further analysis.
Air Quality	Under the Clean Air Act (CAA) (42 USC 7401 *et seq.*), no air quality designation is associated with the Honouliuli site. If national park unit designation occurred it is likely that the areas would fall under the Class II designation. Class II areas allow only moderate increases in certain air pollutants, while Class I areas (primarily large national parks and wilderness areas) are afforded the highest degree of protection. While negligible to minor effects could occur if a site was designated, these impacts would be undetectable because of the location of the site in suburban areas currently affected by vehicular, agricultural and other air quality impacts.
Geological / Paleontological Resources	*Management Policies* (NPS 2006) calls for analysis of geology and geological hazards should they be relevant. Geological resources, including paleontological resources (fossils; both organic and mineralized remains in body or trace form) will be protected, preserved, and managed for public education, interpretation, and scientific research (NPS 2006). Because there are no major geological resources associated with the site, this topic has been dismissed from further analysis.

Table 7-2: Impact Topics Dismissed	
Impact Topic Dismissed	*Discussion and Rationale*
Floodplains	Floodplains are areas of low-lying land that are subject to inundation by the lateral overflow of waters from rivers or lakes with which they are associated. EO 11988 (Floodplain Management) requires an examination of impacts to floodplains, including the potential risk involved in placing facilities within floodplains. It states that federal agencies must: *. . .take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains...* Accordingly, agencies must determine whether a proposed action is located in or would impact the 100-year floodplain. The 100-year floodplain is designated by the Federal Emergency Management Agency (FEMA) as those low-lying areas that are subject to inundation by a 100-year flood (i.e., a flood that has a one percent chance of being equaled or exceeded in any given year). Because, according to initial investigations, no areas of existing development at the sites are within the 100-year floodplain, this topic has been dismissed from further environmental analysis. The Honouliuli Gulch lies in a "D Zone" which corresponds to unstudied areas where flood hazards are undetermined but are possible. Given that the predominant morphological land feature is, essentially, a drainage coming off of the Waianae Range, it is very likely that intermittent flooding occurs, even to the point of threatening structures and other features. Specific proposed placement of facilities in the floodplain are not within the scope of this study, therefore this topic is dismissed from further analysis.
Wetlands	EO 11990 *Protection of Wetlands* requires federal agencies to avoid, where possible, adversely impacting wetlands. In addition, §404 of the CWA authorizes the ACOE to prohibit or regulate, through a permitting process, discharge or dredged or fill material or excavation within waters of the United States. The ACOE identifies three criteria for the identification of wetlands including hydrophytic vegetation, hydric soil, and positive indicators of wetland hydrology (ACOE 1987). The ACOE and EPA jointly define wetlands (under their administration of the CWA) as: *Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas (33 CFR 3 § 328.3, 2004).* DO 77-1: *Wetland Protection* requires that the NPS use the *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin et al. 1979) as the standard for defining, classifying, and inventorying wetlands. This system generally requires that a positive indicator of wetlands be present for only one of the indicators (vegetation, soils, or hydrology) rather than for all three parameters as mandated by ACOE and EPA. As with the ACOE, NPS policies for wetlands protection require a *Statement of Findings* for proposed actions that have the potential to adversely affect 0.10 acre or more of wetlands. As stated in *Management Policies* (NPS 2006) and DO 77-1 *Wetlands Protection*, strive to prevent the loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands. Because, according to initial investigations, no areas of existing development at the sites contain wetlands, this topic has been dismissed from additional environmental analysis.

Table 7-2: Impact Topics Dismissed	
Impact Topic Dismissed	*Discussion and Rationale*
Ethnography / Traditional Cultural Resources	Analysis of impacts to known ethnographic resources is important under the NHPA and other laws. The NPS defines ethnographic resources as any "site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it" (DO-28, *Cultural Resource Management Guideline*:181). Traditional Cultural Properties or other sites are associated with the cultural practices and beliefs of a living community that are rooted in that community's history and are important in maintaining the continuing cultural identity of the community. No traditional cultural properties or ethnographic resources associated with the sites have been identified to date. Therefore this topic has been dismissed from additional environmental analysis. If, at a later date, ethnographic resource concerns were identified from ongoing consultation with individuals and groups associated with the internment sites in Hawai'i and Native Hawaiians, these would be investigated further to avoid impacts.
Soundscape	In accordance with *Management Policies* (NPS 2006) and DO 47 *Sound Preservation and Noise Management*, an important component of the NPS mission is the preservation of natural soundscapes associated with national park units. No impacts to soundscapes have been identified from the alternatives; therefore this impact topic has been dismissed from further environmental analysis.
Wilderness	NPS wilderness management policies are based on provisions of the 1916 NPS Organic Act, the 1964 Wilderness Act, and legislation establishing individual units of the national park system. These policies establish consistent service-wide direction for the preservation, management, and use of wilderness and prohibit the construction of roads, buildings, and other man-made improvements and the use of mechanized transportation in wilderness. All management activities proposed within wilderness are subject to review following the minimum requirement concept and decision guidelines. The public purpose of wilderness in national parks includes the preservation of wilderness character and wilderness resources in an unimpaired condition, as well as for the purposes of recreational, scenic, scientific, education, conservation, and historical use. Because there is no wilderness in or associated with the proposed site, there would be no impacts to wilderness. Therefore this topic has been dismissed from additional environmental analysis.
Human Health and Safety / Hazardous Materials	*Management Policies* (NPS 2006) states that the NPS and its concessioners, contractors, and cooperators will seek to provide a safe and healthful environment for visitors and employees. Inherent risks associated with visiting or working in this site relate to its tropical location, its dry environment,vegetation, and relative isolation. Surrounding agricultural uses and nearby water pumping facilities present an undetermined level of risk. If an NPS unit were later established, NPS standard safety policies and guidelines would be employed and would be used to minimize risk. Because no specific risks associated with the proposed alternatives that have been identified, this topic has been dismissed from additional environmental analysis.
Energy Consumption	Except as associated with travel to the site, implementation of the proposed actions would not cause substantial increases or decreases in the overall consumption of electricity, propane, wood, fuel oil, gas, or diesel. As a result, energy consumption has been dismissed from additional analysis.

Table 7-2: Impact Topics Dismissed	
Impact Topic Dismissed	*Discussion and Rationale*
Lightscapes	In accordance with *Management Policies* (NPS 2006), the NPS strives to preserve natural ambient lightscapes, which are natural resources and values that exist in the absence of human-caused light. No impacts on natural lightscapes have been identified as a result of the actions proposed in the alternatives. Therefore, lightscapes, or night sky, will not be addressed further as an impact topic.
Wild and Scenic Rivers	Under the Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), "…certain selected rivers of the Nation, which with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations." There are no wild and scenic rivers in or proposed within any of the sites; therefore this impact topic has been dismissed from further analysis.
Environmental Justice	EO 12898 requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. The actions evaluated in this EA would not adversely affect socially or economically disadvantaged populations. There would be no disproportionately high and adverse human health or environmental effects on minorities or low-income populations or communities. Potential beneficial effects to these communities, however, are discussed within the Socioeconomics section. Proposed actions would not exclude or separate minority or low-income populations from the broader community or disrupt community cohesiveness and economic vitality. Therefore, environmental justice has been dismissed from additional analysis.
Indian Trust Resources	Indian trust assets are owned by Native Americans but held in trust by the United States. Secretarial Order 3175 ("Identification, Conservation and Protection of Indian Trust Assets") requires that any anticipated impacts to Indian trust resources due to a proposed project or action by agencies within the Department of the Interior be explicitly addressed in environmental documents. The federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes. The sites does not hold or contain areas that are held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians, therefore this topic was dismissed from detailed analysis.
Public Health and Safety	Implementation of some of the proposed actions could potentially benefit public health. The alternatives would preserve open space which would contribute to improved health and recreational opportunities. The benefits to public health and safety would be undetermined, however, and therefore have been dismissed from further analysis.

Table 7-2: Impact Topics Dismissed	
Impact Topic Dismissed	*Discussion and Rationale*
Climate Change and Sustainability	The long-term effects of global climate change are uncertain; however it is clear that the Earth is experiencing a warming trend that affects ocean currents, sea levels, polar sea ice, and global weather patterns. Although these changes may affect precipitation patterns and amounts in Hawai'i, it would be speculative to predict localized changes in temperature, precipitation, or other weather changes, in part because there are many variables that are not fully understood and there may be variables not currently defined. Analysis of the degree to which effects may occur over the timeframe of this plan would be speculative and would not change actions associated with the alternatives. Therefore the effects of future climate change or speculation about changes that would occur are not discussed further.
Soils	*Management Policies* (NPS 2006) require that the NPS understand and preserve, and prevent, to the extent possible, the unnatural erosion, physical removal, or contamination of the soil. Although potential future actions could have a minor effect on soils from disturbance associated with rehabilitation or construction, these site specific impacts are currently unknown and would undergo future environmental analysis. Therefore this topic has been dismissed from further analysis.

Land Use

Honouliuli Gulch is in the Kunia area of central O'ahu, approximately 15 miles west of Honolulu, north of the H-1 Freeway and west of Kunia Road. Current and potential infrastructure (access roads being investigated for inclusion in the potential park unit) are located on three additional parcels to the southwest of the property owned by the University of Hawai'i (See Map, Chapter 5: Ownership and Land Use–Honouliuli Internment Camp) and are agricultural land either actively farmed or fallow. The current land owners purchased the property from the James Campbell Company in 2007. Because of the steep topography along the edges of the Honouliuli Gulch, it was not used for sugar cane or pineapple cultivation. However, starting in 1958, portions of uncultivated land in the gulch were leased for a cattle ranching operation.

The aggregate parcels owned by the Monsanto Company constitute Monsanto's "Kunia Farm" and are mostly dedicated to growing seed corn and other crops. Some areas are currently fallow while other areas are covered by thick vegetation (grasses, mostly guinea grass). Only a small portion of the subject property (7-acre parcel) is outside of the gulch and in cultivation. At present, the Honouliuli Gulch is mostly overgrown with grasses and brush. Vegetation is routinely cut around some remnant historical features of the former internment camp. Several years ago, the Japanese Cultural Center of Hawai'i (JCCH) started offering guided tours of the former internment camp, and has been cutting vegetation to provide access for the tours.

Other uses of the area include three small parcels owned by the City and County of Honolulu Board of Water Supply (BWS) that house municipal water supply wells (Honouliuli II-1, II-2, and II-3), a concrete control building, and a water treatment plant within the fenced area at the Honouliuli II-1 well site. These parcels are currently fenced and maintained by BWS. There is a recently paved access road entering the gulch from the east side of the subject property. Large satellite dishes owned by the KITV television station have been installed on the slope of the gulch, near the access road, in the southern part of the gulch. The remnant structures within the gulch associated with the former internment camp consist primarily of building foundations, rock walls, and fence remnants.

Parcels owned by the Monsanto Company surround Honouliuli Gulch to the northwest, north, and east, while parcels owned by the

University of Hawai‘i bound it to the south and southwest. These agricultural lands are either actively cultivated or fallow. The nearest residential development to the subject property is located east of Kunia Road at a distance of approximately 1 mile, and south of highway H-1 at a distance of approximately 1 mile.

Within the extent of Monsanto Parcel 1, east of the subject property, there are three additional parcels owned by BWS, and one small parcel owned by Hawaiian Electric. BWS operates two municipal water supply wells (Honouliuli I-1 and I-2) on its parcels, located just east of the access gate to the gulch access road, where Hawaiian Electric operates a substation. BWS wells were completed between 1986 and 1989. BWS also operates two water reservoirs near the southernmost corner of the subject property, near the H-1 Freeway (Honouliuli 228). Both BWS and Hawaiian Electric hold easements on Monsanto Parcel 1 to allow access to their properties.

Agricultural (i.e., ‘cane haul’) roads exist throughout the area and, in some cases, terminable rights of access are associated with certain parcels.

PRIME AND UNIQUE FARMLAND

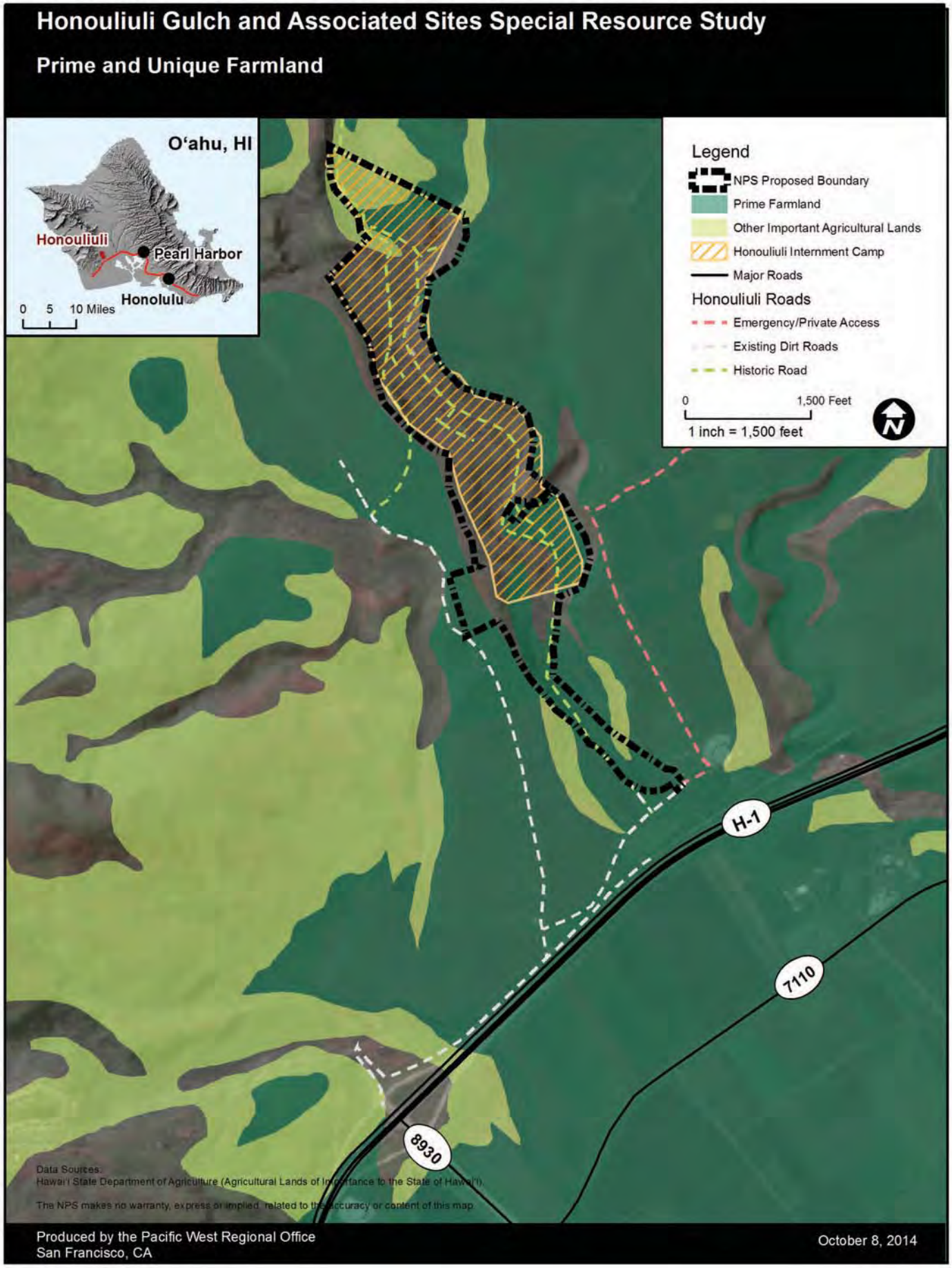
Based on the ALISH (Agricultural Lands of Importance to the State of Hawai‘i) classification system, most areas within the historic internment camp, as defined by the National Register of Historic Places, are not considered prime or unique farmland. Only two small areas, one in the far north of the historic site, and one in the far east near the current entry road, are classified as prime farmland. No lands are classified as unique farmland. These two areas are owned by the Monsanto Company, but are currently fallow. Areas to the west of the historic site owned by the University of Hawai‘i, and the 7-acre overlook parcel owned by the Monsanto Company are classified as prime farmland. The 7-acre site is currently fallow. However, most of the UHWO lands are under cultivation (see Map: Prime and Unique Farmland). The University of Hawai‘i is currently working on a strategic land use plan that will determine the future use of these agricultural lands which could include either university or non-university related land uses.

IMPACTS OF ALTERNATIVE A

There would be no changes in land ownership, occupancy, or use as a result of implementation of this alternative. Sites, organizations, and programs significant to the internment in Hawai‘i would continue to operate independently. Honouliuli Gulch is not managed to provide visitor opportunities—although intermittent controlled access by interested agencies and organizations would continue to be expected.

To the immediate west of the Honouliuli Gulch is a large (over 900 acres) parcel owned by the University of Hawai‘i—West O‘ahu (referred to as the Mauka property). The University of Hawai‘i has designated approximately 294 acres within the Mauka property (the area nearest to the H-1 Freeway) for future campus expansion or University-related development (including scientific and research activities), as required under the land transfer agreement with the Estate of James Campbell. A land use plan and campus plan have not yet been completed for the Mauka property and, once completed, will guide the development of this property. The University of Hawai‘i has issued agriculture permits for grazing and cultivation on the Mauka parcel. The 294 acres could be developed and characteristics that identify it with the Japanese American internment history could be modified or lost. This could result in moderate to major adverse impacts. Direct effects to prime farmland adjacent to Honouliuli Internment Camp would be dependent on future use of the land as determined by the University of Hawai‘i in its strategic land planning process. Occasional use of Honouliuli Gulch for interpretive tours and research as permitted by the current landowner would have no direct effects on prime farmland.

Except for other sites in Hawai‘i already listed on local or national historic registers (for example Kilauea Military Camp in Hawai‘i Volcanoes National Park and the U.S. Immigration Station in Honolulu), there may be no coordination related to preservation of the internment of Japanese Americans and European Americans. Over time, there could be systematic loss of this and related sites, where not already protected by private or municipal preservation organizations, and a long-term indirect minor to moderate adverse effect could


Honouliuli Gulch and Associated Sites Special Resource Study
Prime and Unique Farmland
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
NPS Proposed Boundary
Prime Farmland
Other Important Agricultural Lands
Honouliuli Internment Camp
Major Roads
Honouliuli Roads
Emergency/Private Access
Existing Dirt Roads
Historic Road
0 1,500 Feet
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H-1
7110
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Data Sources:
Hawai'i State Department of Agriculture (Agricultural Lands of Importance to the State of Hawai'i).
The NPS makes no warranty, express or implied, related to the accuracy or content of this map.
Produced by the Pacific West Regional Office
San Francisco, CA
October 8, 2014

occur because there would be no effort made to link these sites as part of a group, potentially leading to less collective desire for protection. Pending continued protection of sites designated or eligible as NHLs or listed in the National Register of Historic Places (NRHP), effects would remain moderate.

IMPACTS OF ALTERNATIVE B (PREFERRED ALTERNATIVE)

Designation of Honouliuli Internment Camp as a national historic site would be coordinated with national, regional and local organizations. The site would be owned and managed by the National Park Service. Possible changes to zoning could occur through City and County of Honolulu (and adjacent landowner) land use plans to reflect the historic preservation of Honouliuli Gulch and visitor uses. Similarly, land use or management plans for the remaining sites within the network of internment locations in Hawai‘i may be modified to preserve, protect and/or recognize the historic significance of these areas.

Long-term beneficial effects and additional localized preservation initiatives could result from recognizing the Honouliuli Gulch site as part of a network of broader Hawaiian sites related to World War II and internment history. Recognition would result in long-term beneficial effects on protection of the Honouliuli Gulch site, and potentially the other locales. NPS technical assistance and applicable historic preservation grants could be used to preserve these other internment sites where current owners/managers do not have the resources to showcase its significance, resulting in long-term beneficial effects on land use from historic preservation efforts and new opportunities to provide visitors with a better understanding of the importance of the site. There could be better protection of the Honouliuli Internment Camp cultural landscape and increased use by visitors.

Coordination with the University of Hawai‘i provides the opportunity to share and provide physical, educational, and interpretive resources. Depending on the extent of future anticipated visitor use, there could be changes to the UHWO regional plan to enhance aspects of the University of Hawai‘i—West O‘ahu campus and agricultural fields adjacent to Honouliuli Gulch for visitors if Honouliuli Gulch were to be designated a unit of the national park system. Direct effects to prime farmland could result from road improvements required for visitor access. The extent of such effects would need to be reassessed should the University of Hawai‘i’s strategic land planning process identify future activities and uses other than agriculture for these parcels.

MEASURES TO AVOID, MINIMIZE OR MITIGATE IMPACTS

Development of visitor-related (and some administrative) infrastructure would be limited within the boundary of the Honouliuli Internment Camp National Register property due to infrastructure capacity and environmental constraints. Likely support for visitor facilities would be in the vicinity of the UHWO campus to take advantage of existing development plans and more easily manage access methods (i.e., shuttle buses). The 7-acre parcel adjacent to the Honouliuli Gulch area is an agricultural field under recent cultivation. This site could be an appropriate location for limited visitor transition facilities (i.e. limited parking, interpretive wayside exhibits, shade structures, vault toilets) that require no new utilities.

Initial plans for access into the Honouliuli Gulch area would require rights of access from UHWO and coordination with neighboring agricultural operations.

CUMULATIVE EFFECTS

Under alternatives A and B, there could be cumulative impacts on land use resulting from the campus development on the UHWO lands to the west of Honouliuli Gulch and construction of the Honolulu rail line. Impacts would largely be associated with developing agricultural lands, which was the historic setting for Honouliuli Internment Camp. However, this development could also support increased visitation to the Honouliuli site which would result in greater public understanding about the internment history.

Alternative B would have increasing levels of beneficial cumulative effects on land use for agricultural purposes. For example, re-zoning of the surrounding agricultural lands for activities other than agriculture may have a

negative impact on the preservation of cultural resource values (i.e., diminished viewsheds). Alternative B would support continued use of the agricultural zoning as a method to promote open space and a more 'historic' land use pattern that sets the context for Honouliuli Gulch. Honouliuli Gulch, by virtue of its location in an 'out of sight' drainage surrounded by agricultural lands, became a remote and inaccessible place—precisely fitting the perceived need to keep internees away from the rest of the O'ahu Japanese American population (and vice versa).

CONCLUSION

Alternative A would have no direct effects on land use, but lack of a specific preservation direction for Honouliuli Gulch could result in incremental changes to use of the agricultural lands surrounding the gulch, resulting in long-term moderate to major adverse impacts to the Honouliuli Internment Camp.

Alternative B would have long-term beneficial effects from linking the site and resultant preservation initiatives to the National Park Service. With a reliance on 'offsite' visitor contact infrastructure (in the vicinity of UHWO), and utilization of existing roads, visitor impacts to existing agricultural operations surrounding Honouliuli Gulch would be limited. Impacts to UHWO's parcels in the immediate vicinity of the Honouliuli Gulch area would need to be reassessed should the university's planning process identify an activity other than agriculture for these parcels.

Water Resources

Honouliuli Gulch is a riparian corridor running between Pearl Harbor's West Loch and the Waianae Range with an ephemeral stream. The elevation of Honouliuli Gulch ranges from approximately 600 feet above mean sea level at the north to 220 feet above mean sea level at the south. The gulch is about 500 to 700 feet wide with steep slopes; the depth of the gulch floor below the gently sloping adjacent land is approximately 70 to 100 ft. There are no permanent streams within the subject property or adjacent parcels. However, following heavy precipitation on the Waianae mountain range and the Kunia area, surface water drains through the gulch, forming the ephemeral Honouliuli Stream. At the northern end of the gulch, the U.S. Geological Survey (USGS) maintains a stream flow gauge (station number 16212480 Honouliuli Stream Tributary). To the north of the gulch, Reservoir #155 receives water from Waiahole Ditch, the primary irrigation water source to the area. The Waiahole Ditch originates on the windward side of O'ahu and terminates just north of the subject property, on Monsanto's parcel 9-2-001-001. Historically, water from the Waiahole Ditch was transported through the subject property by way of an aqueduct and siphon (pipeline) system. Topography of the land surrounding the gulch is gently sloping towards the south-southeast towards Pearl Harbor's West Loch area. Elevation and water features are identified on the Map: Water Resources.

The Hawai'i State Department of Health has required recordation of a Declaration of Restrictive Covenants (Domestic Waste Water Treatment and Disposal) in connection with the Monsanto Company's actions to subdivide the property.

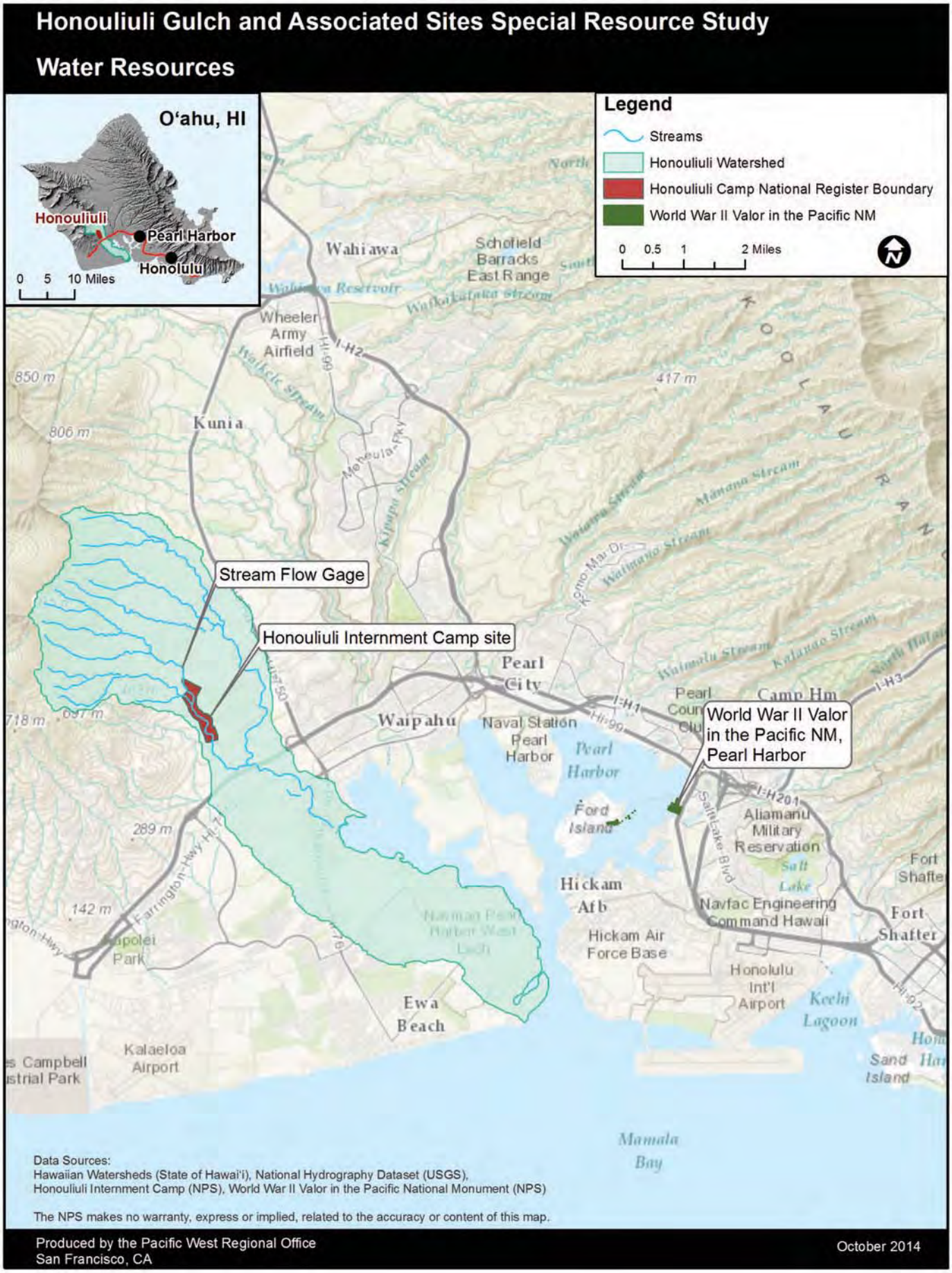
IMPACTS OF ALTERNATIVE A

There would be no known changes to water resources as a result of implementation of this alternative. Because no changes would occur in management of the existing site, there would be no new impacts to water resources.

IMPACTS OF ALTERNATIVE B

Although modifications could be made to accommodate visitor parking and walking trails through the gulch, the known water resources located at this site (i.e. ground water pumping station used to support existing Bureau of Water Supply operations, the ephemeral stream, the USGS Water Gauge) would not be adversely impacted.

If Honouliuli Internment Camp was to be designated a National Park Service site, there would eventually be minor impacts to water resources if modifications to the drainage were made. Among the modifications that could be considered would be small bridges (similar to the six small bridges used during the confinement period) or box culvert to avoid impacting the stream crossing from repeated vehicle crossings of the creek during ephemeral flows. At other times of the year, this area is a dry wash.


Honouliuli Gulch and Associated Sites Special Resource Study
Water Resources
O'ahu, HI
Honouliuli
Pearl Harbor
Honolulu
0 5 10 Miles
Legend
Streams
Honouliuli Watershed
Honouliuli Camp National Register Boundary
World War II Valor in the Pacific NM
0 0.5 1 2 Miles
Stream Flow Gage
Honouliuli Internment Camp site
World War II Valor in the Pacific NM, Pearl Harbor
Wahiawa
Schofield Barracks East Range
Wheeler Army Airfield
Kunia
Pearl City
Waipahu
Naval Station Pearl Harbor
Pearl Harbor
Ford Island
Hickam Afb
Hickam Air Force Base
Aliamanu Military Reservation
Salt Lake
Navfac Engineering Command Hawaii
Fort Shafter
Honolulu Int'l Airport
Keehi Lagoon
Sand Island
Ewa Beach
Kalaeloa Airport
Campbell Industrial Park
Mānana Stream
Manana Stream
Waimalu Stream
Kalauao Stream
Kipapa Stream
Waikele Stream
Waiawa Reservoir
Waikakalaua Stream
Manala Bay
Data Sources:
Hawaiian Watersheds (State of Hawai'i), National Hydrography Dataset (USGS),
Honouliuli Internment Camp (NPS), World War II Valor in the Pacific National Monument (NPS)
The NPS makes no warranty, express or implied, related to the accuracy or content of this map.
Produced by the Pacific West Regional Office
San Francisco, CA
October 2014

A vegetation management plan would be expected to be developed, potentially impacting the use of groundwater by large woody plants in the gulch. The reduction of this vegetation may result in more regular flows and longer periods of groundwater presence in the stream.

Long-term beneficial effects on hydrology and water quality could occur over time by improved attention to the existing (and potential) infrastructure and relative geomorphological impacts to the ephemeral stream. Construction would have short-term minor adverse impacts from the potential for sedimentation from excavation around the stream channel for placement of infrastructure improvements.

MEASURES TO AVOID, MINIMIZE OR MITIGATE IMPACTS

Measures that would be included to minimize impacts to water resources include the utilization of best management practices associated with near stream activities (i.e., barriers to prevent sedimentation of streams, erosion prevention measures, etc.). Limited data from the USGS water gauge shows that water flow in the ephemeral stream occurs in the form of flash floods with fast draw down periods. There do not appear to be regular 'seasons' of high/low flow in the stream, although it is expected that the wet season period will likely result in the more consistent flows (i.e., November through April).

The National Park Service would ensure that wastewater facilities improvements would not impact groundwater resources presently utilized by the Board of Water Supply. There are no water waste systems currently in place in the gulch. If the site were designated a unit of the national park system, to the extent possible, such facilities would be located outside of Honouliuli Gulch in the vicinity of the overlook parcel and would be consistent with the Department of Health covenant associated with the property.

CUMULATIVE EFFECTS

Because Honouliuli Internment Camp is located in an agricultural area it is likely that these actions will contribute negligible to minor adverse effects during runoff to area water quality. Because there would be no direct actions associated with alternative A, there would be no contribution to cumulative impacts. Alternative B likely contributes negligible to moderate localized adverse impacts as a result of increased visitation over alternative A because of the stream crossing, if deemed necessary for access into the gulch.

CONCLUSION

Alternative A would have no direct effects and ongoing minor adverse effects on water resources. Alternative B would have initial, primarily short-term, negligible to moderate adverse effects followed by long-term beneficial effects on water resources.-

Biological Resources

VEGETATION (INCLUDING NONNATIVE SPECIES)

The entire site was cleared for the construction of the internment and POW camp in 1943. Prior to use as an internment site, the gulch supported ranching activities and irrigation infrastructure development. Existing vegetation represents over half a century's growth of mostly introduced vegetation.

Much of the Honouliuli Gulch area is overgrown with vegetation, most notably invasive species such as guinea grass (*Panicum maximum*) and haole koa (*Leucaena* sp.), with Chinese banyan trees (*Ficus microcarpa*) near the creek drainage that runs north to south through roughly the center of the gulch. Other species observed at the site include sandalwood (*Santalum ellipticum*), monkeypod (*Samanea* sp.), sisal (*Agave sisalana*), mock orange (*Murraya paniculata*), allamanda (*Allamanda cathartica*), wild bitter melon (*Momordica charantia*), and kukui (*Aleurites moluccana*).

After discussion with the U.S. Fish and Wildlife Service, a determination was made that there were no listed species present in the vicinity of the Honouliuli Gulch, so the NPS decided to dismiss threatened and endangered species from further consideration.

Impacts of Alternative A

Where bare ground exists there would continue to be the potential for colonization by nonnative invasive plants, a long-term minor impact that

could range to moderate associated with the agricultural operations in the area.

Impacts of Alternative B

Management of the cultural landscapes associated with the Honouliuli Internment Camp would undoubtedly require a vegetation management plan promoting reduction of canopy and brush. Historic period photographs of the gulch show an area with limited to no overhead vegetation and very low lying ground cover (grasses). It is unknown at this point what impact a vegetation management program would have on native flora and fauna habitat, however, through a continued presence by the National Park Service, greater attention to, and awareness of, the vegetation and wildlife resources in Honouliuli would exist.

A vegetation management plan may result in moderate adverse effects on native vegetation if that plan emphasized brush and canopy reduction and if there were strong assemblages of native vegetation reliant on brush and canopy plants. Similarly, because the site ecosystem is located in an area that has been largely modified by the presence of roads, buildings, structures, utilities, and other facilities associated with agricultural activity and water resource use, very little native wildlife habitat exists.

Alternative B anticipates visitor access and would therefore require infrastructure support outside of the gulch, and some level of vegetation management inside the gulch. Impacts to native and nonnative flora and fauna would also be limited and would primarily have minor to moderate short-term adverse impacts from disturbance. Long-term minor adverse impacts, such as from removal of nonnative vegetation, could also occur as landscape plans are implemented and native plants impacted. The extent of the native plant community in the gulch is not clearly understood at this time.

Although native vegetation could be used in future landscaping efforts, it is likely that the site would continue to be comprised primarily—though at a significantly lower level—of nonnative landscaping that is true to its historic period of significance. This would include eliminating large nonnative trees and shrubs as senescence or die-off occurred or through active removal.

Summer archeological field school, Honouliuli. Photo: Jeffery Burton.

Measures to Avoid, Minimize, or Mitigate Impacts

With a proposed active NPS management role in alternative B, Honouliuli Gulch would be monitored for protected species and noxious species. These two categories of flora and fauna would be managed in keeping with the guidance identified in NPS *Management Policies 2006* and under laws and policies regulating federal management of these resources.

Cumulative Effects

Alternative A would have no new effects and no new contributions to cumulative effects. Ongoing cumulative effects would continue to be present from existing development. Overall cumulative effects would remain moderate to major from previous alteration of vegetation and wildlife habitat and presence at these sites.

Alternative B would have minor to moderate cumulative adverse effects from vegetation management activities needed to preserve the historic landscape features (irrigation ditches, concrete slabs, pier footings, etc.), as well as historic viewsheds documented in period photographs. The likely removal of extensive portions of the (primarily nonnative) vegetation will impact the existing flora and fauna habitats found in Honouliuli Gulch. A vegetation management plan (as a component of a cultural landscape report) would need to be developed under alternative B and would require further environmental compliance review and include a more in-depth survey of biological resources and potential impacts.

Conclusion

Alternative A would have negligible to minor short-term adverse effects on native vegetation and wildlife. Alternative B would likely have minor to moderate, primarily short-term adverse impacts on existing biological resources, with further refinement of this conclusion through steps such as developing a cultural landscape report, conducting vegetation surveys, and/or preparing a vegetation management plan.

Cultural Resources

This section includes the assessment of effects to prehistoric and historic archeology, historic structures, cultural landscapes, and museum collections.

The Honouliuli Internment Camp is listed in the National Register of Historic Places and is nationally significant under criteria A —the property is associated with events that have made a significant contribution to the broad patterns of our history, and criteria D —the property has yielded, or is likely to yield information important in prehistory or history.

Other sites that were found to be nationally significant and retain a high degree of integrity include the U.S. Immigration Station, currently listed in the National Register of Historic Places and Kilauea Military Camp, eligible to be listed in the National Register of Historic Places.

For detailed descriptions of the cultural resources see Chapters 2 and 3.

Assessment of effects to cultural resources includes the use of determinations as defined in Section 106 of the National Historic Preservation Act. Table 7-3 is a crosswalk of the NEPA effects with the Section 106 effects.

Table 7-3: Crosswalk for NEPA and Section 106 Effects		
NEPA	*Section 106*	*Description*
Negligible to Minor	No Effect	A determination of no historic properties affected means that either there are no historic properties present or there are historic properties present in the area of potential effects (APE) but the undertaking will have no effect upon them (36 CFR 800.4(d)(1)).
Minor to Moderate	No Adverse Effect	A determination of no adverse effect means there is an effect, but the effect would not meet the criteria of an adverse effect [36 CFR Part 800.5(a) (1)], i.e. diminish the characteristics of the cultural resource that qualify it for inclusion in the National Register (36 CFR 800.5(b)). In addition, the undertaking may start out as an adverse impact but may be mitigated in design, or is modified, reduced, and/or avoided such that it no longer would produce an adverse effect on historic resources. This category of effects may have effects that are considered beneficial under NEPA, such as restoration, stabilization, rehabilitation, and preservation projects.
Major	Adverse Effect	An adverse effect occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the National Register, e.g. diminishing the integrity (or the extent to which a resource retains its historic appearance) of its location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the alternatives that would occur later in time, be farther removed in distance or be cumulative (36 CFR 800.5(a)(1)). An adverse effect may be resolved in accordance with the 2008 Programmatic Agreement, or by developing a memorandum or program agreement in consultation with the SHPO, ACHP, American Indian tribes, other consulting parties, and the public to avoid, minimize, or mitigate the adverse effects (36 CFR Part 800.6(a)).

ARCHEOLOGY

This section refers to both prehistoric and historic archeological resources. Much of the archeological resources that remain and have been studied at Honouliuli are historic. More research is needed to better understand the extent of the prehistoric resources within the Honouliuli Gulch.

Development related to Honouliuli Internment Camp occurred prior to the advent of or just as cultural and archeological resources protection laws and guidelines were instituted. As a result, it is both unknown and unlikely that archeological resources were surveyed for during development of the internment camp. Systematic archeological surveys and research at the Honouliuli Internment Camp were initiated in 2006. This effort is being coordinated by UHWO and JCCH. Archeological resources at Honouliuli are described in detail in Chapters 2 and 3.

Impacts of Alternative A

Under alternative A, there would be no anticipated new actions that would affect prehistoric or historic archeological resources. Although no new actions would occur, use of the site by current landowners could have the potential for ground disturbance and consequent impacts to archeological resources, particularly where some remnant native vegetation and soils exist. Therefore, although no new actions are proposed, current landowners could continue to modify areas under their control and could affect known and previously undiscovered archeological resources. Depending on the significance of these and the extent of disturbance, this

could be a negligible to major adverse effect. Additionally, lack of preservation management of the archeological resources could result in erosion or natural disturbances. Archeological resources could also continue to receive some beneficial effects from zoning, historic preservation, and landowner stewardship. Under Section 106, alternative A would have no effect to adverse effect.

Impacts of Alternative B

Under alternative B, impacts to known and undiscovered archeological resources would be negligible to minor given that the intent of managing the site as a national park unit would be to preserve the cultural resources present. Development of some areas within the site to accommodate visitors, including placement of navigational and interpretive signs could have minor adverse effects from disturbance of archeological resources. Federal preservation laws would require the assessment of any areas proposed for disturbance and subsequent planning efforts to avoid or minimize impacts to cultural resources. Overall effects would likely be minor and under Section 106 would have no effect or no adverse effect on archeological resources. Beneficial effects could also occur from additional survey, research, and documentation of new archeological sites. In addition, enhanced NPS involvement at Honouliuli could result in additional staffing and funding to protect archeological resources, a long-term beneficial effect.

Measures to Avoid, Minimize or Mitigate Impacts

Measures to minimize impacts to prehistoric and historic archeological resources would include:

- Location of primary visitor and operational facilities outside of the historic camp boundary.
- Survey of project areas by a professional archeologist for prehistoric and historic cultural remains.

Immediate work stoppage and/or relocation to a non-sensitive area would occur should unknown archeological resources be uncovered during ground disturbing projects at the site. The site would be secured and consultation with the Hawai‘i State Historic Preservation Officer would occur to determine appropriate actions to be taken.

Cumulative Effects

Archeological resources within the Honouliuli Internment Camp may have been previously disturbed to varying degrees from past disturbances including pre-World War II agricultural practices, the development of the internment camp, erosion, and other natural processes. Because mitigation measures would be employed to minimize impacts to potentially unidentified cultural resources in other proposed and future projects, it is likely that these would protect archeological resources from additional impacts. There would be no construction-related contributions to cumulative impacts from new actions proposed under alternative A; ongoing impacts from landowner actions, however, could continue to occur. It is unknown whether there would be contributions to cumulative impacts on resources from proposed actions that would be implemented by others as identified in the vicinity of the sites. It is likely that under alternative B, if archeological remains were inadvertently discovered during construction, these alternatives could contribute additional negligible to minor adverse impacts which would be mitigated by additional investigation of the find immediately upon discovery or relocation of the work to a non-sensitive area.

Conclusion

Under alternative A, if the site continued to be undeveloped, there would be a minor long-term adverse effect to archeological resources from erosion and natural processes. If the landowner implemented development in the site without proper precautions to protect archeological resources, there would be a minor to major long-term adverse effect to the resources. Under Section 106, impacts could range from no effect to an adverse effect. Alternative B would include a plan for managing and preserving archeological resources, therefore it would have no effect or no adverse effect.

HISTORIC STRUCTURES / CULTURAL LANDSCAPES

Honouliuli Internment Camp contains over 130 features related to the incarceration of American civilians, resident aliens, and prisoners of war during World War II. Contributing resources in the archeological site include two standing buildings, numerous building foundations, rock walls, fence remnants, artifact scatters, and other features.

At least four of the associated sites no longer have extant structures that date to the events that occurred during their association with internment at Honouliuli. None of the associated sites are presently being managed for their relationship with internment.

Impacts of Alternative A

Under alternative A, some of the structures at the Honouliuli Internment Camp would continue to receive some protection from landowner stewardship. Others would continue to be neglected. Over time, buildings and structures would likely be demolished or disappear through benign neglect. Depending on the significance of these structures and the extent of disturbance, this could be a minor to major adverse effect. Historic structures could also continue to receive some beneficial effects from zoning, historic preservation, and landowner stewardship. Under Section 106, alternative A would have no effect to adverse effect.

For other sites associated with internment during World War II, alternative A would continue existing management approaches taken by the variety of landowners of such sites. While there may be recognition of the historic significance of these areas, there would not necessarily be an overarching approach taken to preserve either the cultural landscape integrity (such as it may exist in some locations) or to preserve the historic structures. With the exception of sites under federal or state ownership, protection of historic structures and landscapes would be voluntary and dependent on the owners' initiative.

Impacts of Alternative B

Honouliuli

NPS management of Honouliuli Internment Camp would ensure that preservation laws and policies would be followed to protect the historic structures at the site. Any remaining historic structures would be stabilized and preserved to tell the story of Honouliuli. Likely a cultural landscape inventory or cultural landscape report would be conducted to identify Honouliuli's cultural landscape characteristics and would provide preservation and treatment recommendations. These would all be beneficial to the historic structures. There is a minor chance that some NPS management efforts needed to improve the site or provide for visitor and staff health and safety would result in impacts to the historic resources. Under Section 106, alternative B would have no effect and no adverse effect on historic structures.

Other Sites

Alternative B would allow the National Park Service the opportunity to provide technical assistance to the other associated sites for preservation guidance and assistance with nominating sites to the National Register of Historic Places, if warranted. However, with limited recognition for many of the other related sites, there would likely continue to be a wide range of effects on these sites, ranging from beneficial effects where they were designated on the NRHP (such as Kilauea Military Camp) or by other municipalities (such as in Līhuʻe and Wailuku, Maui) and protected to no effect, no adverse effect and adverse effects, depending on the disposition of the properties and the interest and initiative of landowners in maintaining the characteristics which make the sites potentially eligible for the NRHP.

Cumulative Effects

Historic structures and landscape features within the Honouliuli Internment Camp may have been previously disturbed to varying degrees from past activity including pre-and post-World War II agricultural practices, the development of the internment camp, erosion, and other natural processes. Because mitigation measures would be employed to minimize impacts to known and unidentified cultural resources in other proposed and future projects, it is likely that these would protect

the historic structures from additional impacts. There would be no construction-related contributions to cumulative impacts from new actions proposed under alternative A; ongoing impacts from landowner actions however could continue to occur. It is unknown whether there would be contributions to cumulative impacts on resources from proposed actions that would be implemented by others as identified in the vicinity of the sites. Under alternative A, the cumulative impacts would be no effect and no adverse effect. Under alternative B, the National Park Service would protect and preserve any significant historic structures and landscape features. These preservation efforts would be beneficial and result in no effects to historic properties.

Conclusion

Under Alternative A, no specific actions would be taken to ensure the stabilization or preservation of historic structures at Honouliuli Internment Camp. There would be no systematic effort to inventory or rehabilitate cultural landscapes. Other sites eligible for the NRHP could be maintained or modified and there could be a variety of effects, ranging from no effect to no adverse effect to adverse effect. The preservation and management of these sites would continue to be dependent on the initiative of their private landowners.

It is likely that the U.S. Immigration Station and Kilauea Military Camp would continue to be preserved, a long-term beneficial effect. It is not clear whether other associated sites would continue to be preserved. Under Alternative B, Honouliuli Internment Camp would receive some level of appropriate funding for resource protection and preservation. Associated internment sites and groups could also be eligible to receive grants to promote stewardship, preservation, and education programs related to the internment story.

MUSEUM COLLECTIONS

The current museum collections for Honouliuli Internment Camp include artifacts associated with recent archeological excavations by Burton and Farrell with the University of Hawai‘i—West O‘ahu, oral history collections at the University of Hawai‘i, the Japanese Cultural Center of Hawai‘i, and other entities focused on Japanese internment and archival materials related to the design, construction, and operation of the camp. Other materials include the agricultural records for Campbell and Del Monte.

Impacts of Alternative A

There would be no changes to museum collections as a result of implementation of alternative A. Standards of care would vary among organizations and individuals holding objects. The lack of systematic museum collection management could result in minor to moderate adverse effects to museum collections.

Impacts of Alternative B

In alternatives B, the NPS would take on an expanded role for conservation and protection of museum collections because it could, in fact, acquire objects pertinent to its role in providing for visitor services interpretation and education in these alternatives. The NPS could also work in partnership with the JCCH in its role as collection center for archival materials. There is potential for beneficial effects to occur from its ability to lend management and collections expertise (technical assistance) to this and other partner foundations, organizations and individuals. It is also likely that, as overall coordinator of Japanese American internment history in Hawai‘i, the NPS could become the recipient of donated objects or broader collections from individuals or organizations. To the extent that these were curated and stored by the NPS in an acceptable depository, there would be long-term beneficial effects on museum collections.

Measures to Avoid, Minimize or Mitigate Impacts

Objects obtained by or donated to the NPS would be curated in an appropriate museum facility. Under alternative B, the NPS would identify or provide technical support for a repository for collections storage. Where requested, the NPS could provide technical support regarding museum collections.

Cumulative Effects

With the exception of efforts made by the JCCH, there has been no systematic collecting or documenting objects associated with the internment of Japanese Americans in Hawai‘i. However, a range of documents, oral histories, art, and other objects is available to researchers

at the Japanese Cultural Center of Hawai‘i research center in Honolulu. Alternative B would likely also have negligible to moderate beneficial effects coupled with cumulative beneficial effects on museum collections.

Conclusion

Under alternative A, museum collections would continue to be collected and maintained by a variety of entities in a non-systematic manner. The lack of a uniform and systematic collection plan could result in minor to moderate adverse impacts to museum collections. Alternative B would result in beneficial effects to the current and newly obtained museum collections.

Visitor Use and Experience

ACCESS AND TRANSPORTATION

Current access to Honouliuli Gulch is restricted. Any access to the site is by special permission only and requires compliance with Monsanto Company security protocols. Accessing the site involves traveling on the Monsanto property along dirt roads designed and used for agricultural research purposes and secured with locked gates. Access to the associated internment sites located throughout Hawai‘i varies depend on the land owner. The U.S. Immigration Station is located on a busy thoroughfare (Ala Moana Boulevard) in Honolulu. Access to the U.S. Immigration Station is controlled through a guarded entry and is available only by appointment with Department of Homeland Security staff.

Impacts of Alternative A

There would be no changes to access and transportation to Honouliuli as a result of implementation of alternative A. Without a national park system unit related to the internment in Hawai‘i, it is anticipated that current limited and restricted visitation to the Honouliuli Internment Camp would continue. Existing federal, state, and county programs and policies would remain in place. The JCCH would continue to offer limited visitor activities in other locations, and possible activities at the site with the permission and concurrence of the landowner, such as the Day of Remembrance pilgrimage. Alternative A would have no new effects on access and transportation.

Impacts of Alternative B

Under alternative B, the NPS would plan for access and transportation to Honouliuli Gulch to provide the most effective access to the site. Access to the site could be via a combination of vehicle access roads and footpaths. Following designation, management planning would consider transportation options and would outline access routes to the site in a manner that is both sensitive to the resources and the overall visitor experience. Use of existing roads would be explored to minimize site disturbance. With an increased tourist awareness of a national park site’s presence at Honouliuli, and with the development of visitor amenities, it would be expected that Honouliuli would be viewed as an important location for learning about our nation’s Pacific War history as well as an opportunity to interact with O‘ahu’s natural environment. In addition to daily operations, special events and commemorations (i.e., pilgrimages) would likely be held at the site. Both daily operation needs and special events would be considered in the transportation and access planning. Coordinated planning for transportation and access for Honouliuli Gulch would have long-term beneficial effects to the site.

Measures to Avoid, Minimize or Mitigate Impacts

Measures to minimize impacts to access and transportation would include a reliance on existing rights-of-way and roadways to, and in, the Honouliuli Gulch area. Nearby transit opportunities (located at and near the University of Hawai‘i—West O‘ahu) could assist with reduced infrastructure development near the gulch. These nearby transit modes include both rail (under development) and bus that will serve the growing university campus and surrounding businesses. A shuttle system to convey visitors up to Honouliuli Gulch could be considered in a management plan under alternative B to manage vehicle and pedestrian circulation.

Implementation of alternative B would include the development of uniform signage in conjunction with local transportation authorities, to direct visitors to the site, if an NPS site was created.

Cumulative Effects

Alternative A would have no new actions and thus there would be no cumulative effects on visitor access and transportation. The potential development of the UHWO property along with the designation of a national park unit would increase the number of people that access the area. However, with the development and implementation of a management plan, the impacts would be reduced to negligible to minor long-term adverse.

Conclusion

Alternative A would have no effect on access and transportation. Current conditions would continue. Because there would be few changes in levels of service at the sites, there would likely be no effect on transportation and no changes in traffic congestion.

Alternative B would have long-term beneficial effects as a result of a transportation plan developed as part of a new national park designation. There would be an increase in visitation to the site, but the transportation management through implementation planning would account for these changes and provide an effective and efficient manner for which visitors would access and navigate the site. The development of a management plan that would identify appropriate locations for improved roadways and footpaths would be beneficial to the site.

VISITOR USE OPPORTUNITIES / INTERPRETATION AND EDUCATION

Current visitor use opportunities including interpretation and education at Honouliuli Internment Camp are restricted to sporadic, limited tours coordinated by the Japanese Cultural Center of Hawai‘i. Interpretation and educational opportunities regarding Honouliuli Internment Camp are provided outside of the gulch using a variety of media, but these are virtual experiences as opposed to in-person experiences. For example, World War II Valor in the Pacific National Monument at Pearl Harbor provides an interpretive exhibit on internment during World War II.

Onsite presentation, 2011 Day of Remembrance Pilgrimage to Honouliuli Internment Camp. Photo: Brian Niiya, Japanese Cultural Center of Hawai‘i.

Visitor use and interpretation and education opportunities at the associated sites are very limited and vary according to the property owner. Because many visitor use opportunities would be associated with interpretation and education, these topics have been combined below.

Impacts of Alternative A

There would be no changes in visitor use opportunities as a result of implementation of this alternative. Occasional special events could allow for public access to Honouliuli Internment Camp. For instance, guided tours were offered on the Day of Remembrance in 2012, but not in 2013. Public use would continue to be limited and would be dependent on the initiative of the visitor to take advantage of opportunities to see related sites and on the agreement of the site owner to make it available to the public, resulting in a long-term minor to moderate adverse effect.

Opportunities are also available to learn about Honouliuli through various websites, including the JCCH (www.Hawaiiinternment.org) and websites for sites and resources on the mainland. The JCCH website offers access to teacher lesson plans, photographs and archives, a timeline, and links, while the other websites offer articles, white papers, timelines, photographs, and other written material. Visitation would be expected to remain at current levels, including periodic increases for special events. While no additional visitor services would be provided in alternative A, there would be ongoing visitor use opportunities to experience Honouliuli Internment Camp and information, a long-term beneficial effect.

Impacts of Alternative B

Honouliuli

In addition to a variety of ongoing beneficial effects in alternative A, there would be enhanced opportunities for visitor use in alternative B. Designation of a national historic site would create new opportunities for visitors to experience and understand the history and experience of Japanese American and European American incarceration during World War II. New visitor use opportunities at Honouliuli and Valor in the Pacific National Monument could be provided. At Valor in the Pacific National Monument, the NPS could link the two sites with interpretive programming, identifying major themes and coordinating information and some activities associated with the two sites. Educational programs developed by the NPS and its partners would highlight the role of Japanese Americans during WWII.

Because potential development of a visitor center is uncertain, many of the visitor use opportunities in alternative B would be dependent on WWII Valor in the Pacific National Monument to develop visitor facilities and internet-based information. Expansion of existing partnerships between the NPS, UHWO, and JCCH could further enhance interpretation and education programs. Coordination of the site by the NPS under alternative B would improve visitor understanding and education of this era in history over the no action alternative. There would also be new information on the internet, including an NPS-based website for pre-visit planning and for those people studying the history of the Japanese American and European American incarceration during World War II. Such a website could offer links to other existing websites, such as the JCCH website, other NPS sites, Densho, and the Japanese American National Museum site.

Other Sites

While some locations on neighbor islands would continue to be viewed only from the outside and current unrelated uses would likely continue, it is also possible that over time these sites could become more accessible to the public. Nonetheless, even commemorative and interpretive signs indicating the events that transpired would improve visitor use opportunities and experiences. Increased visitation may result in increased public knowledge and could further encourage protection of resources, resulting in beneficial impacts over time. Combined there would be long-term beneficial effects by providing new and/or expanded visitor use opportunities associated with designating a new national historic park unit.

Cumulative Effects

Current visitor use opportunities are offered on a limited basis by the property owner and the Japanese Cultural Center of Hawai‘i. There would be no cumulative effects to visitor use opportunities under alternative A because these would not be coordinated or expanded. Alternative B would contribute an array of beneficial cumulative effects by providing additional visitor use opportunities that highlight the history of Japanese American, European American, and prisoner-of-war incarceration during World War II. The implementation of this alternative would result in cumulative beneficial effects over time, as more Americans would gather a better understanding of this history and the implications of due process and civil rights. Moreover, information would be available through an NPS website and visitor use opportunities on site would be advertised and potentially coordinated by the NPS.

UHWO development could potentially have short-term impacts on the development of educational and interpretive programs at Honouliuli due to construction traffic, noise, and vibration, and long-term impacts from the noise associated with increased traffic.

The Hawai‘i legislature has commissioned a group, called the Honouliuli Park Site Advisory Committee, to support preservation of the Honouliuli site. Recent site planning efforts have been related to an education facility, although no recommendations or decisions have been made by the state of Hawai‘i. The potential impacts to visitor use of the sites are unknown at this time.

Conclusion

Alternative A would have no effect on visitor use opportunities and interpretation and education about the history and experience of Japanese American and European American incarceration during World War II. Alternative B would have beneficial effects on visitor use opportunities associated with understanding the history and experience of Japanese American and European American incarceration during World War II. The action alternative would contribute to engendering a better understanding of these events for all Americans as well as for international visitors. Because of the inclusion of NPS involvement, alternative B would provide a centralized national location for information about the history and experience of Japanese American and European American incarceration during World War II that would be available to all in perpetuity.

Socioeconomics

WEST O‘AHU SOCIOECONOMIC SETTING

The west O‘ahu area was at one time used primarily for both agricultural production (sugar cane and pineapple) and military infrastructure (Barbers Point, Ewa Field). Located just beyond the more highly developed and populated Pearl Harbor area, and significantly further from the central ‘core’ of downtown Honolulu, west O‘ahu represents a primarily non-urban setting with increasing development opportunities and pressures. West O’ahu is where the ‘second city’ of Kapolei is being promoted as an alternative governmental agency center away from the high-density Kakaako district near downtown Honolulu. This community is the closest example of a ‘gateway’ community to the Honouliuli Gulch area, though it is separated by over a mile on the H-1 Freeway.

A recent economic study, (Identification and Quantification of Economic Development Opportunities in West O‘ahu; SMS Consulting; Honolulu, HI, July 2011) prepared for the West O‘ahu Economic Development Association, states that while the west O‘ahu area has seen rapid population increase, this surge will slow to just slightly above the population trend of the City and County of Honolulu. Primary employment sectors are projected to be in the education and health fields, arts and entertainment fields, and construction and transportation sectors. Most businesses in west O‘ahu are small (fewer than ten employees and most annual sales under $1 million annually). These businesses primarily serve immediate community residents and are mostly headquartered in west O‘ahu.

Historically, settlement in the west O‘ahu area was strongly connected to agricultural plantation operations that relied on a series of ethnic groups as sources of labor. This is one of the reasons why Hawai‘i has such a strong mix

of Portuguese, Japanese, Chinese, and Filipino (among other) communities. Many were hired to come to Hawai‘i and perform farm labor, after which a large number elected to stay. With the decline of agricultural production and greater diversification of the state economy, the communities near the Honouliuli Gulch area represent newly arrived residents attracted to the more suburban development plan and more affordable housing. Educational attainment is varied in west O‘ahu with Kapolei (the closest community to Honouliuli Gulch) having highest educational attainment rates for this part of O‘ahu.

The dispersed nature of the associated internment sites located throughout Hawai‘i, and their setting in either remote areas or settings with other primary uses (i.e., local government settings) makes it difficult to generalize the overall socioeconomic impacts of the two alternatives. The feasibility of promoting greater tourism to these locations—and therefore enhanced economic development opportunities for these areas—is likely limited. More in-depth, site specific feasibility assessments on socioeconomic impacts to associated sites would need to be conducted once these individual sites engage in strategies to promote preservation and site stewardship of internment history in Hawai‘i.

Impacts of Alternative A

There would be no changes to socioeconomic conditions as a result of implementation of this alternative. Under alternative A, services provided at the sites would continue at the same levels. No new direct impacts on the regional economy would occur with this alternative.

Impacts of Alternative B

Designation of a Honouliuli national park unit would likely have beneficial economic and social impacts on the area. Possible socioeconomic impacts could include visitation to the site or sites, surrounding areas, and other attractions; expenditures from park operations and park staff; expenditures by visitors, sales, and hotel tax revenues from visitor expenditures; and growth in visitor-related businesses that support the tourism economy.

Although the western part of O‘ahu has historically had an agricultural-based economy, it includes growing retail, tourism, government, education, and a variety of other employment sectors. Establishing a new national historic site in west O‘ahu would have negligible effects on the state economy. It is likely that tourism numbers for the state of Hawai‘i would not increase solely because of Honouliuli becoming a national historical site. However, additional visitors and NPS staff would contribute to the local economy by purchasing various goods and services, including food, gasoline, and lodging. Overall, beneficial impacts on the local economy would be expected. Interpretive tours for visitors would likely generate local economic benefits in the vicinity of the University of Hawai‘i—West O‘ahu commercial development area—to the extent that commercial development provides goods and services needed by visitors. Over time there would likely be sustained economic benefits from tourism dollars and jobs supported by them.

Cumulative Effects

Because there would be no new actions in alternative A, there would be no contribution to cumulative impacts on socioeconomics. Under alternative B, the Honolulu Rail and UHWO campus expansion (including planned commercial development near the existing campus and future university development onto the Mauka parcel) would have a beneficial cumulative impact to the Honouliuli National Historic Site by providing transportation access and an educational portal with partnership opportunities for people visiting the site.

Because there would be no new actions in alternative A, there would be no contribution to cumulative impacts on socioeconomics. Alternative B would contribute increasingly beneficial effects to socioeconomics. Combined with past, present, and future actions, such as the new University of Hawai‘i campus in West O‘ahu, alternative B would have negligible to minor beneficial contributions to cumulative socioeconomic impacts.

Conclusion

Alternative A would result in no direct or cumulative impacts on socioeconomics. Because it would allow the Hawai‘i internment history to be shared at a national park site,

alternative B would have localized beneficial impacts on socioeconomics, including some discernible impacts on local communities, as well as beneficial impacts on the heritage documentation of some minority populations.

Environmentally Preferable Alternative

In accordance with NPS Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* and Council on Environmental Quality (CEQ) requirements, the NPS is required to identify the "environmentally preferable alternative" in all environmental documents, including EAs. The environmentally preferable alternative is determined by applying the criteria suggested in the National Environmental Policy Act (NEPA) of 1969, which is guided by the CEQ. The CEQ (46 FR 18026 - 46 FR 18038) provides direction that the "environmentally preferable alternative is the alternative that would promote the national environmental policy as expressed in NEPA's Section 101," including:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NEPA Section 101(b)).

Generally, these criteria mean the environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038).

Alternative B would protect the nationally significant resources, including opportunities for protecting the Honouliuli site in perpetuity should the Monsanto Company donate or sell it to the NPS, meeting criterion 1 above. Alternative B would also best meet the intent embodied in criteria 2, 3, and 4 by providing opportunities for protection of the Honouliuli site with more opportunities for visitors to learn about the history and experience of Japanese American and European American incarceration during World War II. All alternatives would likely meet the principles identified in criteria 5 and 6. Although there are no specific actions related to these currently in the alternatives associated with these criteria, long-standing NPS policies and actions would apply. Based on this analysis, alternative B best meets the six criteria and is therefore the environmentally preferable alternative.

Table 7-4: Comparison of Impacts		
Resource	*Alternative A*	*Alternative B*
Land Use	There would be no direct impacts to land use. Existing land use plans and zoning would continue to guide management of individual areas. Over time, there could be systematic loss of the Honouliuli Internment Camp and sites related to the history and experience of Japanese American and European American incarceration during World War II. A long-term indirect minor to moderate adverse effect would occur because there would be no effort made to link Honouliuli to other NPS sites, potentially resulting in less desire for protection.	There would be long-term beneficial effects from designating Honouliuli Internment Camp as a unit of the national park system. This designation would offer a high level of preservation and management to the Honouliuli Internment Camp. Associated internment sites in other parts of the state could also be linked and therefore more protection initiatives would be offered for them. Some associated internment sites could be modified or lost, a minor to moderate long-term adverse effect.
Water Resources	There would be no direct impacts on water resources from implementation of this alternative.	This alternative would improve existing roadways and would limit development to areas outside of the historic camp boundary, resulting in a benefit to the water resources. Development of a road crossing through the gulch could result in minor temporary construction runoff and overall long-term beneficial impacts from improved protection of water quality.
Vegetation	There would be no new impacts to vegetation. Ongoing minor to moderate adverse impacts to vegetation from invasive species would continue to occur. No known federally threatened or endangered species occur at the Honouliuli Internment Camp.	Changes, such as the placement of roads, trails, parking areas, and signs, could occur to accommodate visitor use. Because these changes would generally occur in highly modified habitats, they would have negligible to minor short-term effects on native vegetation. The development and implementation of a vegetation management plan as a component of a historic landscape plan would direct changes to vegetation density and composition in the Honouliuli Gulch.
Prehistoric and Historic Archeological Resources	If the site continued to be undeveloped, there would be a minor long-term adverse effect to archeological resources from erosion and natural processes. If the landowner implemented development in the site without proper precautions to protect archeological resources, there would be a minor to major long-term adverse effect to the resources. Under Section 106, impacts could be no effect, no adverse effect, or adverse effect.	Placement of visitor facilities such as trails, parking, and signs would not be expected to affect archeological resources if located outside of the historic boundary and/or in areas that have already been disturbed. There would be long-term beneficial effects where state or federal archeological resources protection laws were invoked and/or from further survey or testing research. There would be no effect or no adverse effect on archeological resources.

Table 7-4: Comparison of Impacts		
Resource	*Alternative A*	*Alternative B*
Historic Structures/ Cultural Landscapes	No specific actions would be taken to ensure the protection of the NRHP-listed Honouliuli Internment Camp. This would result in no adverse or adverse effects.	Overall impacts to historic and cultural resources at Honouliuli would range from no effect to no adverse effect to adverse effect. With establishment of an NPS management unit, it is likely that actions to accommodate visitors would have no effect or no adverse effect. This could also extend to related sites in other areas, pending willingness of landowners to manage sites in accordance with historic preservation guidelines. However the NPS would retain only a technical assistance, coordinating, or advisory role. Where management actions to protect sites, buildings and structures occurred, there would be long-term beneficial effects. Where they did not, minor to moderate adverse effects could occur.
Museum Collections	There would be no new impacts. Alternative A would not add appreciably to protection of museum collections, although some objects and materials could continue to be protected through UHWO, JCCH, and others. Some objects may also be lost due to lack of protection options.	Alternative B would have the potential to add to museum collections and to provide for a systematic collection plan and would result in beneficial effects to the current and newly obtained museum collections.
Visitor Use and Experience: Access and Transportation	There would be no changes to access and transportation. Current conditions would continue.	Alternative B would include the development of a Honouliuli Gulch management plan that would identify desired visitor experiences and identify the most effective access and transportation options to the site. A management plan would outline access routes to the site in a manner that is sensitive to the resources as well as a way to enhance the visitor experience. Both daily operation needs and special events would be considered in the transportation and access planning. A well-developed transportation and access plan for Honouliuli Gulch would have long-term beneficial effects to the site.
Visitor Use and Experience: Visitor Use Opportunities/ Interpretation and Education	There would be no effect on visitor use opportunities and interpretation and education.	Alternative B would have beneficial effects on visitor use opportunities associated with understanding the history of the Japanese American internment during WWII. Because of the National Park Service presence, alternative B would provide a centralized national location for information about the history of the Japanese American internment during WWII in Hawai‘i that would be available to all in perpetuity.

Table 7-4: Comparison of Impacts		
Resource	*Alternative A*	*Alternative B*
Socioeconomic impacts, including minority and low-income populations	There would be no direct or cumulative impacts on socioeconomics.	Alternative B would have localized beneficial impacts on socioeconomics, including some discernible impacts on local communities, as well as beneficial impacts on the heritage documentation of some minority populations from sharing this story at a national park site. Commercial services available in the still developing University of Hawai‘i—West O‘ahu area may benefit from increased heritage-related tourism.

Honouliuli Day of Remembrance and first annual Pilgrimage. Photo: NPS, 2010.

CHAPTER 8: CONSULTATION AND COORDINATION

Public Involvement

Congress directed the National Park Service to complete a special resource study of sites that are significant to the incarceration of Japanese Americans and European Americans during World War II, and to determine whether one or more of these sites are eligible and suitable to be managed as a unit of the national park system. The study team provided opportunities for elected officials, local governments, organizations, and residents in Hawai‘i to learn about and contribute to the study process through public meetings, stakeholder meetings, a newsletter, and the study website.

As directed in the legislation, the NPS consulted with the state and local historical associations and societies, including state historic preservation offices, Native Hawaiian and local government entities, and other interested parties.

SCOPING

The NPS study team launched public scoping for this study in February 2011. The NPS produced and distributed newsletters to the media, individuals, organizations, and government officials. The purpose of the newsletter was to introduce the study, explain the process to community members, and solicit comments on issues the study should address. The newsletter also contained information on the schedule of public scoping meetings.

The newsletter was published and made available for comment on the National Park Service's Planning, Environment and Public Comment (PEPC) website. The comment period extended to June 1, 2011, 30 days after publication of the notice of scoping in the *Federal Register*. Comments received after the closing date were also accepted.

Press releases announcing the beginning of the study process and the public meeting schedule were distributed to local media. Numerous articles and opinion pieces about the study have appeared in area newspapers. All information sent by mail or e-mail was also available on the special resource study website at *www.nps.gov/pwro/honouliuli*.

In February and March 2011, the study team held a series of public scoping meetings on the six main islands in Hawai‘i (Table 8-1). The meetings were attended by more than 100 people. The presentation included an overview of the study purpose and process, identification of the sites associated with the internment, and potential management ideas and outcomes. After the presentation, the NPS staff facilitated group discussions to capture public comments related to the study.

In addition to comments received at the public scoping meetings, the NPS received comments via written letters and through e-mail.

Local, state, and federal government officials and associated organizations and individuals were contacted. Numerous telephone conversations were held when face-to-face meetings were not possible. The NPS met with the following entities during scoping:

Japanese Cultural Center of Hawai‘i

University of Hawai‘i—West O‘ahu

University of Hawai‘i—Mānoa

Historic Hawai‘i Foundation

Hawai‘i Judiciary History Center

Hawai‘i Department of Land and Natural Resources

Honouliuli Day of Remembrance, 2011.Photo: NPS.

Table 8-1: Public Scoping Workshops, 2011		
Location	*Date*	*Attendance*
Waipahu, HI Honouliuli Day of Remembrance	February 27, 2011	18
Kailua-Kona, HI	March 1, 2011	6
Hilo, HI	March 10, 2011	10
Kaunakakai, Molokaʻi, HI	March 17, 2011	6
Lānaʻi City, HI	March 22, 2011	3
Kahului, Maui, HI	March 24, 2011	12
Līhuʻe, Kauaʻi, HI	March 29, 2011	26
Honolulu, HI	March 31, 2011	23
TOTAL		104

SUMMARY OF PUBLIC SCOPING COMMENTS

Public comments predominantly expressed the desire to commemorate the internment experience in Hawaiʻi. People felt that internment and incarceration during World War II is an important part of Hawaiian history and noted the differences between the experiences of Japanese Americans on the mainland. Most stated that there are important lessons to be learned from this history.

Management

When asked if the NPS should be involved in managing the internment sites, most respondents expressed strong support for NPS management and involvement at the sites, particularly at Honouliuli Gulch. This support was structured around the perception that preservation of the sites and interpretation about this part of history aligns more closely with the mission of the National Park Service than with that of any other organization. The public also stated that the NPS is the entity most able to manage the sites, rather than other entities who could contribute as partners, but not also as land managers.

Partnerships

Commenters expressed strong support for partnerships, especially for education, research, and collecting oral histories. The partners that were mentioned with greatest frequency were the Japanese Cultural Center of Hawaiʻi, the University of Hawaiʻi, the local government, veterans' associations or veterans' centers on the islands, and businesses.

Honouliuli Gulch Preservation

Public comments related to Honouliuli Gulch supported the designation of the site as a unit of the national park system. The public also supported the NPS acceptance of the donation of Honouliuli Gulch from the Monsanto Company.

There were numerous comments about how best to share the story and what types of experiences visitors could have at Honouliuli Gulch. Suggestions for interpretation included: 1) a visitors center with oral histories, videos, educational displays, and programs; 2) reconstruction of representative structures including barbed wire, guard towers, a tent or barracks, and mess hall; and 3) external educational and research resources including websites, links to other educational institutions, and confinement sites.

Many people thought Honouliuli Gulch would be the best location for the NPS's preservation and interpretive efforts related to the internment in Hawaiʻi. There was support for preservation and interpretation at the other sites as well, recognizing that these efforts could be accomplished in partnership with the NPS.

Some people thought that Honouliuli Gulch could be linked to World War II Valor in the Pacific National Monument on Oʻahu. Such a connection could tie this part of Hawaiian history to the larger World War II story and help bring attention and visitation to the site because of the name recognition and association with World War II Valor in the Pacific National Monument.

Other Sites

At public meetings throughout Hawai‘i, people generally focused their comments on their local sites. Thus, there was strong support for recognizing the sites on the neighbor islands. At a minimum, participants said that each site could (and should) be marked with a plaque or other commemorative marker. Technical assistance could be provided by the NPS for preservation and interpretive programs.

There was also strong support expressed for providing wider access to Kilauea Military Camp for all visitors, and for onsite interpretation and a guided or self-guided walking tour.

Interpretation

Many public comments focused on interpretation and history of the sites. Suggestions included interpretation on martial law and civil rights in Hawai‘i, redress and reconciliation after the war, the lives of the Japanese Americans in the camp and within the local communities, and the relationship of this part of history to current affairs. There was also interest in the history of the prisoners of war at Honouliuli and Kilauea Military Camp.

Agency Consultation

Section 106 of the National Historic Preservation Act

The State of Hawai‘i Department of Lands and Natural Resources Historic Preservation Division was notified by JCCH in 2011 about the Honouliuli Gulch special resource study. They provided a letter to the NPS dated May 4, 2011 indicating that the area of potential effect would be the gulch itself and access roads to the gulch. They stated that the “acquisition of the property will have no adverse effect on historic property.” To comply with NPS responsibilities for Section 106, at the time of release of the draft study in May 2014, the NPS requested consultation by the State Historic Preservation Division to seek concurrence on 1) recognition of the special resource study undertaking, 2) the area of potential effect, 3) identification of historic properties within the Honouliuli Gulch area, and 4) finding of No Adverse Effect to historic properties. The State Historic Preservation Division concurred with these findings in a letter dated September 23, 2014.

Honouliuli Day of Remembrance, 2011.Photo: NPS.

Section 7 of the Endangered Species Act

The study team initiated consultation under Section 7 with the Pacific Island field office of the U.S. Fish and Wildlife Service in June 2011 with regard to an updated list of any threatened and endangered species associated with the study sites. The U.S. Fish and Wildlife Service found that the study would have “no effect” on federally listed species. Further evaluation would be warranted if major construction projects were proposed as a result of study outcomes and implementation. The U.S. Fish and Wildlife Service was invited to comment on the draft study.

List of Draft Study Recipients

The draft study, executive summary newsletter, or announcement that the study is available online was sent to contacts on the study mailing list. The draft study and an executive summary newsletter are available at *www.nps.gov/pwro/honouliuli*.

The draft study was sent to the following agencies and organizations:

FEDERAL AGENCIES AND ELECTED OFFICIALS

Advisory Council on Historic Preservation
Congressional Representatives
- Senator Brian Schatz
- Senator Mazie K. Hirono
- Congresswoman Tulsi Gabbard
- Congresswoman Colleen Hanabusa

U.S. Department of Homeland Security
U.S. Department of Interior
- National Park Service
- Ala Kahakai National Historic Trail
- Haleakalā National Park
- Hawai‘i Volcanoes National Park
- Kaloko-Honokōhau National Historical Park
- Kalaupapa National Historical Park
- Manzanar National Historic Site
- Minidoka National Historic Site
- National Park of American Samoa
- Pu‘uhonua O Hōnaunau National Historic Site
- Pu‘ukoholā Heiau National Historic Site
- Tule Lake Unit
- War in the Pacific National Historical Park
- World War II Valor in the Pacific National Monument

Office of Native Hawaiian Relations
U.S. Fish and Wildlife Service

STATE AND LOCAL AGENCIES AND ELECTED OFFICIALS

City and County of Honolulu Planning
Governor Neil Abercrombie
Honolulu County
Honouliuli Park Site Advisory Committee
Senator Mike Gabbard
Senator Will Espero
Representative Richard Lee Fale
Department of Business, Economic Development, and Tourism
Department of Land and Natural Resources
- State Historic Preservation Division
- State Parks Division

Department of Hawaiian Home Lands

BUSINESSES, INSTITUTIONS, AND ORGANIZATIONS

‘Ahahui Siwila Hawai‘i o Kapolei
Bishop Museum
Hawai‘i Historical Society
Historic Hawai‘i Foundation
Japanese American Citizens League
Japanese American National Museum
Japanese Cultural Center of Hawai‘i
Kapolei Community Development Corporation
Monsanto Company
National Parks Conservation Association
National Parks Foundation
National Trust for Historic Preservation
Office of Hawaiian Affairs
Pacific Historic Parks
Society of Hawaiian Archaeology
University of Hawai‘i–Mānoa
University of Hawai‘i–West O‘ahu
Select public libraries in the Hawaiian Islands

PUBLIC REVIEW OF DRAFT STUDY REPORT

The National Park Service (NPS) released the *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment* (draft study report/EA) on May 8, 2014. The public comment period was open from May 8 to July 15, 2014.

The NPS announced the release of the draft study report, public comment period, and public meetings through press releases, e-mail announcements, and through the distribution of a newsletter. The NPS sent study reports to agencies, organizations, government representatives, and stakeholders. Paper and e-newsletters were sent to approximately 800 contacts. The project was launched on the NPS Planning, Environment, and Public Comment (PEPC) website and project website (**www.nps.gov/pwro/honouliuli**). These websites provided downloadable versions of the draft study report/EA, background information about the study, and an online form to receive public comments. The public was invited to submit comments by mail, e-mail, fax, online, at public workshops, and during an online meeting where individuals could participate through a conference line and internet website.

The NPS received more than 3,100 comments on the draft study report.

Public Meetings

The public meetings in the Hawaiian Islands and the online public meeting were attended by 256 people (see table 8-2). At each meeting, the study team described the study purpose and process, findings of the study, and presented the two alternatives Following this presentation, NPS staff facilitated a question-and-answer session and group discussions where attendees provided public comments.

Table 8-2: Public Meeting Attendance, Draft Study Review

Location	*Date*	*Attendance*
Kapolei, Oʻahu University of Hawaiʻi—West Oʻahu	May 27, 2014	50
Honolulu, Oʻahu Japanese Cultural Center of Hawaiʻi	May 28, 2014	92
Honolulu, Oʻahu Japanese Cultural Center of Hawaiʻi	May 29, 2014	53
Līhuʻe, Kauaʻi Līhuʻe Neighborhood Center	May 29, 2014	15
Kaunakakai, Molokaʻi Kaunakakai Elementary School	June 2, 2014	—
Kahului, Maui Maui Arts and Cultural Center	June 2, 2014	9
Lānaʻi City, Lānaʻi The Lānaʻi Senior Center	June 3, 2014	4
Hilo, Island of Hawaiʻi Hawaiʻi Japanese Center	June 4, 2014	25
Online public meeting	June 17, 2014	8
TOTAL		256

Public Comments

The NPS received comments from over 3,100 individuals, agencies, elected officials, and organizations. Approximately 95% of the comments were submitted as a result of an organized campaign initiated by the National Parks Conservation Association in support of alternative B, which proposes the designation of Honouliuli Internment Camp as a unit of the national park system. Sixty-five individual comments were submitted via written letters, comment forms, e-mail, and through the PEPC online comment system. Comments analyzed also included the notes from the small group discussions held at each public meeting.

List of Agencies and Organizations Commenting

Comments, both through public workshops or written correspondence, were received from the following organizations, affiliates, and elected officials:

AGENCIES AND ORGANIZATIONS SUBMITTING OFFICIAL COMMENTS

City and County of Honolulu

Councilmember Carol Fukunaga, Honolulu City Council

Hawai‘i Department of Land and Natural Resources, State Historic Preservation Division

Historic Hawai‘i Foundation

Japanese Americans Citizens League

Japanese Cultural Center of Hawai‘i

National Parks Conservation Association

Office of Planning, State of Hawai‘i

University of Hawai‘i–West O‘ahu

U.S. Citizenship and Immigration Services

U.S. Department of Homeland Security

U.S. Representative Colleen Hanabusa

AFFILIATIONS/ASSOCIATIONS NOTED BY PUBLIC MEETING ATTENDEES OR COMMENTERS

Densho

Elks 616 Lodge

‘Ewa Community Church

Fukushima Kenjin Kai

Go For Broke National Education Center

Hawai‘i United Okinawa Association

Heald College

Honouliuli Park Site Advisory Committee

Japanese Cultural Center of Hawai‘i

Kaimuki High School

Lāna‘i Culture and Heritage Center

MIS Veterans Club of Hawai‘i

Monsanto Company

National Park Service

National Parks Conservation Association

National WWII Museum

Nisei Veterans Memorial Center

North American Japanese Garden Association

Research Corporation of the University of Hawai‘i/Army

The Hawai‘i Herald

University of Cincinnati

University of Hawai‘i Center for Biographical Research

University of Hawai‘i–Kapi‘olani Community College

University of Hawai‘i–West O‘ahu

University of Hawai‘i–Windward Community College

University of New Orleans

SUMMARY OF PUBLIC COMMENTS

The following summary represents the full range of comments received. All comments were entered into the NPS Planning, Environment, and Public Comment database (PEPC) and analyzed. NPS responses to substantive comments are provided in the final section of this document, “Response to Substantive Comments on the *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment*.”

Public Review of Draft Alternatives: Support for Alternative B

The vast majority of public comments supported alternative B, the designation of Honouliuli Internment Camp as a unit of the national park system. Commenters overwhelmingly cited the need to preserve the story of Hawai‘i’s World War II internment history and ensure protection of the site in

perpetuity. Several members of the public asked that designation proceed rapidly in order to prevent further degradation of the site and loss of important resources, including oral histories from survivors who are quickly passing away.

A majority of respondents emphasized the need to remember the U.S. internment and incarceration of civilians of Japanese descent to guarantee that such an injustice never occurs again. Many of these individuals felt that a strong educational focus should be integral to NPS efforts to preserve and interpret Honouliuli, in particular relating to issues of civil rights and discrimination. Several described the designation as a meaningful gesture that could confer justice and dignity on those wrongfully incarcerated, while providing a place for descendants to honor their loved ones.

The story of Honouliuli Internment Camp and associated internment sites was described as significant on both a local and national level. Many expressed surprise to learn of the civilians and prisoners of war interned in Hawai‘i, stating that it is a largely unknown chapter in the history of the islands. Several individuals recommended that Honouliuli Internment Camp be preserved in order to demonstrate the unique story of internment in Hawai‘i when compared with the mainland, noting that different populations were affected, including Japanese and European Americans, Japanese and European resident aliens, and prisoners of war. A few commenters suggested that national park designation could inspire additional research about the history of incarceration in the islands.

Others agreed with study findings that designation would be feasible given the proposed donation of land by the Monsanto Company to the NPS. A few highlighted the economic and cultural benefits that a new national park unit could provide to the local community.

A few respondents were against designation of Honouliuli as a unit of the national park system. These commenters stated concerns about funding and the interpretation of World War II incarceration history presented in the draft study report.

Partnerships

A large majority of comments emphasized the importance of maintaining partnerships with local organizations, particularly the Japanese Cultural Center of Hawai‘i (JCCH) and the University of Hawai‘i–West O‘ahu (UHWO), which are already engaged in research, stewardship, and interpretation efforts for Honouliuli and the associated interment sites. Commenters stated that these partnerships

Public meeting following the release of the draft study report, Japanese Cultural Center of Hawai‘i, May 2014. Photo: NPS.

should continue after a NPS designation. A few commenters noted that the NPS draft study report should more strongly emphasize the significance of the work achieved by these partners. The annual Honouliuli Day of Remembrance, organized by JCCH, was cited as an important partner event that should continue. Some remarked that the presence of such active partnerships reveals the commitment of the local community to the story of Hawai'i's confinement sites, while others stressed strong community support for the designation.

Many observed that partnerships could assist with fundraising, research, and the development of educational programs. A number of commenters proposed that the NPS collaborate with specific entities to share the story of World War II internment, notably with the Japanese American community and Hawai'i's public schools. One respondent suggested the formation of a Friends of Honouliuli Gulch nonprofit organization to manage fundraising campaigns and coordinate volunteer activities.

Several commenters offered ideas for specific partnerships with various organizations and agencies. The JCCH, Hospice, and Project Dana were identified as potential collaborators in recording oral histories. One suggestion involved the creation of a center for social justice associated with UHWO, while another respondent recommended programming in association with the King Kamehameha V Judiciary History Center. The proximity of the Honouliuli Forest Reserve to Honouliuli Gulch was highlighted as an opportunity for regional recreation. Another commenter suggested that an NPS unit at Honouliuli would serve as an appropriate complement to the developing Pearl Harbor Historic Trail.

Personal Stories and Reflections

While comments in support of alternative B and partnerships comprised the vast majority of all comments received, a significant proportion of remaining comments offered personal stories and reflections on the importance of Hawai'i's World War II internment history. Many respondents, particularly those attending the public meetings, had a personal connection to Honouliuli Internment Camp and/or the associated internment sites. Several commenters were the children or grandchildren of individuals incarcerated and expressed a deep investment in preserving and sharing the experiences of their family members. Some remembered visiting their parents at Honouliuli or other internment sites and the distress and fear they felt during their visits.

Other reflections addressed the impact of the incarceration on Hawai'i's Japanese American community, including the loss of livelihood and community position endured by internees, and their reluctance to speak about their experiences. Some comments specifically highlighted the effect of the internment on families both of European and Japanese descent. A few shared their memories of the bombing of Pearl Harbor and what occurred during the following days. Several people reflected on the climate of fear and wartime hysteria during World War II in Hawai'i. Some people also expressed how the internment of their family members had forever impacted their lives; they felt shame in being Japanese and that their family members had been interned during World War II.

Associated Sites

Many commenters expressed a strong desire to recognize all World War II internment sites throughout the Hawaiian Islands. Although it was understood that only the Honouliuli Internment Camp is proposed for inclusion in the national park system under alternative B, several individuals suggested that the other sites should somehow be recognized. They suggested that small plaques, waysides, or mobile applications could help with identifying the WWII internment sites. Some emphasized the need to preserve the incarceration story on other islands through increased research and interpretation. One respondent requested that the NPS also consider designation of another World War II-related site, Ewa Field.

Several comments in this category highlighted the significance of the U.S. Immigration Station and the Sand Island Detention Camp in Honolulu, and many stated that these sites should be fully interpreted in order to convey a comprehensive understanding of the incarceration history in the islands. A few respondents relayed their concern that the U.S. Immigration Station was not included

as a feasible addition to the national park system under alternative B (due to the current use of the facility by the U.S. Department of Homeland Security and the Hawai'i State Department of Health). These respondents wished to ensure that the U.S. Immigration Station could be designated in the future if the facility were vacated by its current occupants. The significance of the U.S. Immigration Station to the internment history, as well as the high degree of exposure it receives due to its location, were cited as contributing factors to its importance.

Commenters additionally asked that Sand Island be commemorated in order to recognize its significance as O'ahu's first detention camp and that it held hundreds of internees before they were transported to the mainland. People wanted to somehow convey its harsh living conditions, which were more severe than those at Honouliuli. One respondent suggested that such interpretation could be provided along a historic trail leading from the U.S. Immigration Station to Sand Island and then to Honouliuli Internment Camp.

A few commenters recommended that technical assistance, grants, and partnerships be pursued to support interpretation at all sites. However, some people also expressed concerns that interpretation of associated sites might impinge on private property rights. These respondents asked that the NPS stress that interpretation and technical assistance to associated sites in private ownership be purely voluntary.

The U.S. Department of Homeland Security expressed concern about interpretive features or other measures that would solicit public visitation to the U.S. Immigration Station and adversely impact the operations of the U.S. Immigration and Customs Enforcement operational component at this site.

Visitor Experience and Interpretation

A substantial number of comments were submitted relating to the visitor experience and interpretation at Honouliuli Internment Camp, should the site be designated a national park unit.

Commenters on this topic largely emphasized the need to interpret Hawai'i's internment history in its full breadth and complexity. Some stressed the need to describe the differences between incarceration in the islands and on the mainland. Several others expressed a strong desire that the story be told from multiple angles, including the perspectives of the many and diverse groups affected by the internment. A few respondents asked that Hawai'i's confinement sites be interpreted within the full context of Hawaiian history, stretching from ancient history to the present. Many noted that the best way to convey this history is through the voices and stories of those who experienced it firsthand.

People commenting on interpretation and education offered ideas for future educational and interpretive initiatives, citing the value of the site and its resources to youth and the American public. Advocates for educational programming at Honouliuli suggested providing scholarship and internship opportunities and curriculum support for teachers. Some stated that the internment history in Hawai'i is especially relevant to civil rights abuses occurring today, and that a potential NPS unit at Honouliuli could offer significant lessons in citizenship for young people.

The importance of physically visiting the site was also identified as a tangible way to demonstrate the sense of isolation and punishing conditions suffered by internees. Many suggested that the camp structures should be recreated; however others felt that the history of the site could be powerfully conveyed through other visual means, including digital technology. Suggestions were offered for various exhibit displays, film, and other media, including a virtual tour and digital applications that could connect all of the internment sites across the islands.

A smaller number of people provided suggestions for specific site development and facilities at Honouliuli. Some recommended that new facilities on the site be targeted toward student use. Specific suggestions for new facilities included a learning center or visitor center with audio-visual capacity, bathrooms, and a monument. It was additionally noted that significant community discussions have already taken place surrounding the future development

of Honouliuli Internment Camp, through a visioning charrette hosted by JCCH. The NPS was asked to take this existing planning work into account in future site planning.

Resource Protection

Several comments underscored the need to protect historic resources and archeological features at Honouliuli Internment Camp. Threats identified included nearby development, flooding and erosion in the gulch, wildfire, and encroachment by invasive species. One respondent questioned whether the site would be evaluated for hazardous materials.

The stories of survivors were also identified as a primary resource, and many commenters stated that the recording of oral histories should be a priority. The need to acquire collections items was cited, including personal belongings and objects created by prisoners; it was noted that a curatorial facility would ultimately be required to adequately protect collections.

Access and Transportation

The majority of concerns on this topic were related to access to the potential new unit. Access was identified as an urgent need for the site; securing an access road was described by several people as a crucial requirement for Honouliuli's designation. Various logistical issues were discussed in association with possible roadway alignments, including landownership and traffic associated with the H-1 freeway. One commenter suggested that the public enter the historic site from its historic entry point . Universal accessibility was acknowledged as an important future consideration for site planning.

In addition, a few commenters observed that the site's close proximity to a major metropolitan area makes it easily accessible to many different groups of people, in contrast to mainland confinement sites that are located in remote areas.

Management and Operations

The vast majority of comments relating to future management and operations addressed the subject of entrance fees. Many asked that entrance fees to Honouliuli be waived, as at World War II Valor in the Pacific National Monument, should the site become an NPS unit. Some respondents suggested that fees be waived or reduced at the very least for students and youth; others noted that donations could be accepted in lieu of fees. A few individuals asked about operations and what it would mean for the potential new unit to be overseen by World War II Valor in the Pacific National Monument. One person observed that this offered an opportunity to connect the NPS sites thematically as well as operationally. One comment cited a need for security at the potential new unit, and another respondent stated that Monsanto operations should not be allowed to continue on the site after donation and designation.

Funding

The availability of secure funding to support an NPS unit at Honouliuli was another concern voiced by respondents. While the draft study report stated that federal appropriations for the unit would be supplemented by public and private sources in the form of grants and partnerships, a few commenters questioned the likelihood of receiving the full funds necessary for operation. Others expressed their support for partner involvement in fundraising.

Land Use

Land use-related comments were submitted by the State of Hawai‘i Office of Planning and the University of Hawai‘i–West O‘ahu (UHWO). The NPS was asked to determine whether the proposed designation of Honouliuli Internment Camp would have an impact on coastal resources, and to submit if necessary a consistency determination to the Hawai‘i Coastal Zone Management (CZM) Program. Similarly, the NPS was alerted to the potential need to prepare a Best Management Practices plan to prevent pollution to coastal waters that might occur through site development activities. The NPS was additionally asked to describe in the draft study report the relationship between the proposed designation and existing state and county plans. The impact of a possible designation on UHWO lands was questioned, and UHWO stated their desire to continue to support Honouliuli Gulch as a key partner while maintaining the rights to develop university lands to their highest and best potential.

Information Relevant to the Study and Technical Edits

Over the course of the public comment period, some participants shared new historical information about the WWII internment in Hawai‘i and how individuals and communities were affected. This information included the economic significance of Japanese immigration to Hawai‘i, the impact of martial law on the internment, the cultural and religious effects of the internment on individuals and communities, and details about living conditions and personal experiences at the internment sites. Respondents in particular cited the unique experiences of the few women and children interned at Honouliuli, as well as prisoners of war from Korea and Okinawa. Some commenters suggested that the report could include the stories of families of Japanese descent who voluntarily left the islands to join husbands and fathers incarcerated on the mainland. One respondent asked that information be included about internees who returned to Japan after World War II.

A few individuals contributed new information about the associated sites documented in the draft special resource study. This included new information about the history and location of the Maui County Jail and the Ha‘ikū Military Camp on Maui, new details about the Kalāheo Stockade on Kaua‘i, and the location of a potential new associated site near the Hilo Airport on the island of Hawai‘i.

A few people commented on the level of detail included in the draft study report/EA. While most felt that a suitable level of detail was provided, a few requested that the NPS include more detailed historical information in the document. A few commenters also provided useful technical edits to the draft study report.

Planning Process

Some respondents provided feedback on the planning process, stating that they were extraordinarily pleased that the NPS had invited their participation and was hosting the series of public meetings throughout the Hawaiian Islands. A small number of individuals recommended that the planning team leverage social media and petitions to engage additional participants in the planning process, and one commenter suggested that the NPS reach out to former prisoners of war to include their perspective on the designation. A few people asked questions relating to the timeline for the overall designation process, were it to occur; the reality of funding support for the site; and the likelihood that the necessary land would be donated to the National Park Service.

Honouliuli Day of Remembrance. Photo: NPS, 2011.

RESPONSE TO SUBSTANTIVE COMMENTS ON THE DRAFT STUDY REPORT/EA

The study team reviewed all comments submitted on the *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment*. The following substantive comments were organized and analyzed by topic areas that correlate with sections of the draft study report/EA. The study team grouped similar comments before providing the National Park Service response. A substantive comment is defined by NPS Director's Order 12 (DO-12, Section 4.6A) as one that does one or more of the following:

- questions, with reasonable basis, the accuracy of information in the environmental analysis
- questions, with reasonable basis, the adequacy of environmental analysis
- presents reasonable alternatives other than those presented in the environmental analysis
- causes changes or revisions in the proposal

Comments that contain substantive points regarding information in the draft study report/EA or comments that need clarification are extracted below. Concern statements have been developed to summarize the comments. Corrections to the draft study report/EA are included in an errata document that is available on the study website. The final recommendations for the study are included in the Final Recommendations summary document and are also documented in the Finding of No Significant Impact (October 2014). The draft study report/EA, errata to the draft study report, and the Finding of No Significant Impact together complete the study process.

Historical Background

Concern: Important historical information about the history of internment in Hawai'i was not included in the study, such as the importance of the U.S. terminating immigration from Japan in 1924, the legal question of interning U.S. citizens in Hawai'i, and why some families chose voluntary internment.

Response: The study has been updated to reflect this new information in chapter 2.

Concern: New information was provided about the individuals who were interned at Honouliuli Internment Camp, such as children, women, and individuals of Filipino heritage.

Response: Chapter 2 of the study has been updated to identify the individuals and populations that were interned at Honouliuli Internment Camp.

Associated Internment Sites

Concern: Concerns were raised about private property rights for internment sites that are located on private property. There was concern about federal designation of privately owned sites, the potential for public trespass, the location of historical markers, and questions about eminent domain.

Response: The preferred alternative has been revised to emphasize that any recognition of, or assistance to, associated sites would be voluntary at the request of the landowner and/or site manager. See Chapter 6: Alternatives, Alternative B, Technical Assistance.

Concern: Under alternative B, the NPS authority for providing technical assistance is unclear. This needs more explanation in the study.

Response: The NPS has authority under existing historic preservation laws and programs to provide assistance upon request for the preservation of historic resources. However, the preferred alternative recommends that if legislation were to authorize a new park unit at Honouliuli, such authorizing legislation would provide the authority for NPS to partner or provide assistance to related sites. Such assistance would only be provided when requested or desired by the site's landowner and/or site manager. See Chapter 6: Alternatives, Alternative B, Technical Assistance.

Concern: The other internment sites should receive recognition for their historical significance related to the World War II internment history in Hawai‘i. Plaques, markers, and some level of interpretation and designation is warranted.

> **Response:** In the preferred alternative, the NPS could provide technical assistance in interpreting and/or preserving related sites. Such assistance would only occur where it is appropriate and desired by the site landowner.

Concern: The U.S. Immigration Station is nationally significant and suitable for inclusion in the national park system. It should be considered for national park designation if it becomes available.

> **Response:** The special resource study states that if the U.S. Immigration Station facilities were no longer needed by the U.S. Department of Homeland Security or the Hawai‘i State Department of Health, additional NPS analysis would be needed to determine the feasibility of management options and associated costs, particularly with regard to the cost of operations and maintenance given the size and scale of the facilities. Legislation or presidential proclamation would be required for inclusion in the national park system.

Concern: The U.S. Department of Homeland Security expressed concern about any interpretive efforts that might bring visitors to the U.S. Immigration Station. Such activities could potentially hamper criminal investigations and may have public safety repercussions.

> **Response:** The NPS has removed language about opportunities to provide interpretive exhibits or waysides at the U.S. Immigration Station. The study further clarifies that any interpretation regarding associated sites would be at the discretion of site owners or managers.

Concern: Sand Island played a significant role in the internment history. Most people were interned there, and it operated for over 15 months. There should be some type of recognition or commemoration, such as a marker or monument.

> **Response:** Recognition or commemoration of internment on Sand Island can occur without any NPS designation or action. If the preferred alternative were implemented then the NPS could provide assistance in interpreting or recognizing Sand Island where it is appropriate and desired by the site landowner.

Concern: New information was provided about associated internment sites, including the location of Ha‘ikū Camp, status of the Waiākea Prison Camp, a possible new internment location in Hilo, and resources associated with Kalāheo Stockade.

> **Response:** The study has been updated to reflect this new information throughout the document.

Concern: The historical information provided about the internment location in the Maui County Jail on pages 36–38 is inaccurate. Internees were imprisoned in a facility that was demolished in 1970. The location of the facility was approximately at 600 Waiale Road in Wailuku and the current location of the Maui County Correctional Center.

> **Response:** The study has been updated to reflect this new information. Additional research is needed to determine whether the Maui County Courthouse and Police Station were used for internment.

Other World War II Sites

Concern: The federal government should also consider the historical significance, designation, and acquisition of other important World War II era sites on O‘ahu, namely Ewa Field. The site is currently at risk of development and should be included in the NPS unit World War II Valor in the Pacific National Monument because of its imminent loss. This should be done before Honouliuli is considered for designation.

Response: Ewa Field was not used for internment during World War II, and the evaluation of Ewa Field as an addition to World War II Valor in the Pacific National Monument is beyond the scope of the Congressionally authorized *Honouliuli Gulch and Associated Sites Special Resource Study*.

Land Use

Concern: The State of Hawai'i, Office of Planning stated that the study should: 1) include related land use maps including a map of state land use districts, the *'Ewa Development Plan* Urban Land Use Map, and maps showing the soil quality in the vicinity of the proposed project.

Response: The draft study report has been revised to include the maps of the state land use districts and the *'Ewa Development Plan* Urban Land Use Map. A map of soils was not included as this topic was dismissed from the environmental analysis. The NPS recognizes that soil quality would be a consideration in any implementation plans should a national park unit be designated.

Concern: The study should also: 1) address the relationship of the proposed project with relevant state and county plans such as the *Hawai'i State Plan*, *City and County of Honolulu General Plan*, and *'Ewa Development Plan* and 2) indicate what permits are required for the proposed project.

Response: A discussion of the relationship of the proposed project with relevant state and local plans has been added on page 95 in Chapter 5: Feasibility, and page 138 in Chapter 7: Environmental Consequences.

While the NPS does evaluate whether a potential national park unit would generally be compatible with zoning and land use, at the special resource study level of evaluation the NPS does not propose any specific facilities or development. Therefore the NPS cannot determine at this time what permits would be required for future use and development. If a National Park Service unit were established at the Honouliuli site, the NPS would conduct additional planning efforts to determine appropriate facilities. Such planning efforts would be conducted in compliance with the National Environmental Policy Act and would include appropriate consultation with federal, state, and local agencies.

Concern: The State of Hawai'i, Office of Planning stated, "In accordance with 15 CFR § 930.33(a), the NPS as the proposing federal agency must determine whether the proposed activity will affect any coastal use or resource of the Hawaii Coastal Zone Management (CZM) area. If the federal agency determines that the proposed activity will have a reasonably foreseeable direct or indirect effect on the state's coastal uses or resources, then a consistency determination must be provided to the Hawaii CZM Program for review, pursuant to 15 CFR § 930.34." In addition: "Due to the close proximity of the Honouliuli Internment Camp to the waters of Pearl Harbor and Manele Bay, site improvements and facilities development may have nonpoint pollution implications on coastal waters. If there is any trenching work or ground disturbance and/or grading and clearing work at the site, it may result in erosion and sediment loss and have a negative environmental impact. If so, the Hawaii CZM program recommends that the applicant prepare a Best Management Practices plan."

Response: Designation of Honouliuli Internment Camp as a unit of the National Park System would not have a direct impact on coastal zone areas. If an NPS unit were to be established, more detailed planning for facilities and use of the site would be necessary. Consultation with state and local agencies would occur as part of the planning process. The NPS would strive to minimize any potential impacts to coastal areas and resources and would comply with any applicable federal and state laws.

University of Hawai'i—West O'ahu

Concern: UHWO is concerned about "the future impact the NPS site may have on the development of the University's mauka lands.

It is critical that the University have the ability to utilize and develop the mauka lands to their highest and best potential for the benefit of our University students and our community. We must therefore preserve our rights to develop both University and non-University related uses on any portion of the 991-acre mauka lands including the 285 acres currently contemplated for inclusion in the NPS boundary."

Response: The proposed national historic site or monument boundary has been reduced at the request of the University of Hawai'i. Discussions between the NPS and the University of Hawai'i have identified approaches to public access that do not require inclusion of university lands in an NPS boundary at this time. The NPS appreciates the University of Hawai'i's commitment to working with the NPS on granting access to the site over university lands should a national park unit be established. Future road access could be added to the national historic site or monument boundary once a more permanent road alignment has been determined.

Concern: UHWO's "current planning effort envisions that the mauka lands be considered for both University and non-University related development uses."

Response: The study has been updated to reflect that University of Hawai'i planning efforts are also considering non-university related development uses for the mauka lands.

Concern: UHWO would like "to negotiate acceptable terms and conditions for road access rights over the university lands, recognizing that the future site planning will identify the road alignment and road easement, which may be different than what is included in the study."

Response: Long-term public access to the site is required for an NPS unit at Honouliuli to be feasible. The NPS appreciates UHWO willingness to work together to find acceptable terms and conditions for road access over UHWO lands.

Access and Transportation

Concern: If the 7-acre parcel is developed as the primary staging location for visitor access to Honouliuli Gulch, planning should consider how people with mobility impairments can access Honouliuli Gulch.

Response: If Honouliuli Internment Camp were designated as a national park unit, the types of programs, facilities, and visitor experiences at Honouliuli would be determined through implementation planning. Through implementation planning, the NPS would explore opportunities for direct access and experience in the gulch for all people, i.e. universal access. Site planning would occur following a designation. The NPS would fully consider previous site plans and work done by others in the site planning process.

Concern: Additional work is needed to ensure public access to the site in order to experience the site and learn about its World War II internment history. One idea is to consider using historic alignments, so that visitors are literally walking in the footsteps of the internees. Another idea is to consider the viability of an access route to Honouliuli from the proposed Makakilo Drive Extension.

Response: If Honouliuli Internment Camp were designated as a national park unit, specific access routes would be determined through implementation planning in cooperation with nearby landowners. Transportation planning for access routes would consider visitor experience, feasibility and cost of specific routes, and other factors in identifying specific routes.

Concern: The study should consider increased traffic if there is an access route to Honouliuli off of the H-1.

Response: The level of impact on local traffic would be dependent on the level of access provided (shuttle, onsite parking, etc.). If Honouliuli Internment Camp were designated as a national park unit, the types of programs, facilities, and visitor experiences would be determined through implementation planning.

Visitor Experience

Concern: The study should consider different types of programs, facilities, and visitor experiences for raising awareness about the World War II internment in Hawai'i. One idea is a historical trail linking the internment sites on O'ahu and other islands.

Response: If Honouliuli Internment Camp were designated as a national park unit, the types of programs, facilities, and visitor experiences would be determined through implementation planning.

Funding and Operations

Concern: How can funding to properly preserve the site be ensured, either through federal appropriations and/or partner contributions?

Response: NPS would be responsible for resource preservation and park operations. Federal funding levels would be determined by annual appropriations. Typically, new national parks have limited staff and funding during initial establishment. Increased staffing and funding would happen incrementally over time as implementation planning identifies specific objectives for park management. Partnership collaboration could result in increased capacity to preserve and interpret the site (i.e., funding, volunteers, in-kind donations). The NPS Japanese American Confinement Sites Grant Program would be a possible funding source for partners.

Concern: There would be a substantial cost and burden on taxpayers for road development to provide public access to Honouliuli.

Response: The cost of providing road access would be further explored through implementation planning when identification of potential routes and desired public access levels would be evaluated. There could be opportunities for the NPS to share development and maintenance costs for road access.

Partnerships

Concern: Partners, including UHWO and JCCH, have done significant work in preserving, researching, promoting, and interpreting Honouliuli and the World War II internment history in Hawai'i. The study should recognize these efforts and ensure that these important partners continue to have a significant role in the future of Honouliuli, even if designated as a unit of the NPS.

Response: Page 108 of the draft study report (Chapter 5: Feasibility, Public Interest and Support) describes the extensive work completed by partners to document, preserve, and interpret Honouliuli and other confinement sites. The NPS recognizes the past and current efforts by partners, and NPS assumes this would continue and would seek to maintain existing partnerships and build new partnerships. Additional acknowledgement of these contributions have been included in the alternatives considered in the the study.

The NPS has also included additional text in the selected alternative (Chapter 6: Alternatives, Alternative B, Partnerships) to recognize the significant contributions of existing organizations, such as the Japanese Cultural Center of Hawai'i and the University of Hawai'i in the documentation and interpretation of Honouliuli Internment Camp and other World War II internment sites in Hawai'i. Opportunities for future partnerships with these organizations have also been referenced in the selected alternative.

Fragment of surviving barbed wire, Honouliuli Internment Camp, 2010. Photo: Valentino Valdez.

APPENDICES

Appendix A: Study Legislation

On Oct. 30, 2009, P.L. 111-88, Division A, Department of the Interior, Environment, and Related Agencies Appropriations Act, was signed into law. Title I, Section 125, "Honouliuli Special Resource Study," authorizes the Secretary of the Interior to complete a special resource study of the Honouliuli Gulch and associated sites. The following is the text of the legislation that pertains to the Honouliuli Special Resource Study.

DEPARTMENT OF THE INTERIOR, ENVIRONMENT, AND RELATED AGENCIES APPROPRIATIONS ACT, 2010
PUBLIC LAW 111-88—OCT. 30, 2009

111th Congress

An Act

Making appropriations for the Department of the Interior, environment, and related agencies for the fiscal year ending September 30, 2010, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress...

SEC. 125. Honouliuli Special Resource Study.

(a) IN GENERAL.—The Secretary of the Interior (referred to in this section as the ''Secretary'') shall conduct a special resource study of the national significance, suitability, and feasibility of including the Honouliuli Gulch and associated sites within the State of Hawaii in the National Park System.

(b) GUIDELINES.—In conducting the study, the Secretary shall use the criteria for the study of areas for potential inclusion in the National Park System described in section 8 of Public Law 91-383 (16 U.S.C. 1a-5).

(c) CONSULTATION.—In conducting the study, the Secretary shall consult with—

1. the State of Hawaii;
2. appropriate Federal agencies;
3. Native Hawaiian and local government entities;
4. private and nonprofit organizations;
5. private land owners; and
6. other interested parties.;

(d) THEMES.—The study shall evaluate the Honouliuli Gulch, associated sites located on O'ahu, and other islands located in the State of Hawaii with respect to—

1. the significance of the site as a component of World War II;
2. the significance of the site as the site related to the forcible internment of Japanese Americans, European Americans, and other individuals; and
3. historic resources at the site.

(e) REPORT.—Not later than 2 years after the date of enactment of this Act, the Secretary shall submit to the Committee on National Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate a report describing the findings, conclusions, and recommendations of the study required under this section.

Approved Oct. 30, 2009

Appendix B: 2006 NPS Management Policies (Sections 1.2 and 1.3)

1.2 THE NATIONAL PARK SYSTEM

The number and diversity of parks within the national park system grew as a result of a government reorganization in 1933, another following World War II, and yet another during the 1960s. Today there are nearly 400 units in the national park system. These units are variously designated as national parks, monuments, preserves, lakeshores, seashores, wild and scenic rivers, trails, historic sites, military parks, battlefields, historical parks, recreation areas, memorials, and parkways. Regardless of the many names and official designations of the park units that make up the national park system, all represent some nationally significant aspect of our natural or cultural heritage. They are the physical remnants of our past—great scenic and natural places that continue to evolve, repositories of outstanding recreational opportunities, classrooms of our heritage, and the legacy we leave to future generations—and they warrant the highest standard of protection.

It should be noted that, in accordance with provisions of the Wild and Scenic Rivers Act, any component of the National Wild and Scenic Rivers System that is administered by the Park Service is automatically a part of the national park system. Although there is no analogous provision in the National Trails System Act, several national trails managed by the Service have been included in the national park system. These national rivers and trails that are part of the national park system are subject to the policies contained herein, as well as to any other requirements specified in the Wild and Scenic Rivers Act or the National Trails System Act.

1.3 CRITERIA FOR INCLUSION

Congress declared in the National Park System General Authorities Act of 1970 that areas comprising the national park system are cumulative expressions of a single national heritage. Potential additions to the national park system should therefore contribute in their own special way to a system that fully represents the broad spectrum of natural and cultural resources that characterize our nation.

The National Park Service is responsible for conducting professional studies of potential additions to the national park system when specifically authorized by an act of Congress, and for making recommendations to the Secretary of the Interior, the President, and Congress. Several laws outline criteria for units of the national park system and for additions to the National Wild and Scenic Rivers System and the National Trails System.

To receive a favorable recommendation from the Service, a proposed addition to the national park system must (1) possess nationally significant natural or cultural resources, (2) be a suitable addition to the system, (3) be a feasible addition to the system, and (4) require direct NPS management instead of protection by other public agencies or the private sector. These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation's natural and cultural resources. These criteria also recognize that there are other management alternatives for preserving the nation's outstanding resources.

1.3.1 National Significance

NPS professionals, in consultation with subject-matter experts, scholars, and scientists, will determine whether a resource is nationally significant. An area will be considered nationally significant if it meets all of the following criteria:

It is an outstanding example of a particular type of resource.

It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage.

It offers superlative opportunities for public enjoyment or for scientific study.

It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

National significance for cultural resources will be evaluated by applying the National Historic Landmarks criteria contained in 36 CFR Part 65 (*Code of Federal Regulations*).

1.3.2 Suitability

An area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector.

Adequacy of representation is determined on a case-by-case basis by comparing the potential addition to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the proposed new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

1.3.3 Feasibility

To be feasible as a new unit of the national park system, an area must be (1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries), and (2) capable of efficient administration by the Service at a reasonable cost.

In evaluating feasibility, the Service considers a variety of factors for a study area, such as the following:

- size
- boundary configurations
- current and potential uses of the study area and surrounding lands
- landownership patterns
- public enjoyment potential
- costs associated with acquisition, development, restoration, and operation
- access
- current and potential threats to the resources
- existing degradation of resources
- staffing requirements
- local planning and zoning
- the level of local and general public support (including landowners)
- the economic/socioeconomic impacts of designation as a unit of the national park system

The feasibility evaluation also considers the ability of the National Park Service to undertake new management responsibilities in light of current and projected availability of funding and personnel.

An overall evaluation of feasibility will be made after taking into account all of the above factors. However, evaluations may sometimes identify concerns or conditions, rather than simply reach a yes or no conclusion. For example, some new areas may be feasible additions to the national park system only if landowners are willing to sell, or the boundary encompasses specific areas necessary for visitor access, or state or local governments will provide appropriate assurances that adjacent land uses will remain compatible with the study area's resources and values.

1.3.4 Direct NPS Management

There are many excellent examples of the successful management of important natural and cultural resources by other public agencies, private conservation organizations, and individuals. The National Park Service applauds these accomplishments and actively encourages the expansion of conservation activities by state, local, and private entities and by other federal agencies. Unless direct NPS management of a studied area is identified as the clearly superior alternative, the Service will recommend that one or more of these other entities assume a lead management role, and that the area not receive national park system status.

Studies will evaluate an appropriate range of management alternatives and will identify which alternative or combination of alternatives would, in the professional judgment of the Director, be most effective and efficient in protecting significant resources and providing opportunities for appropriate public enjoyment. Alternatives for NPS management will not be

developed for study areas that fail to meet any one of the four criteria for inclusion listed in section 1.3.

In cases where a study area's resources meet criteria for national significance but do not meet other criteria for inclusion in the national park system, the Service may instead recommend an alternative status, such as "affiliated area." To be eligible for affiliated area status, the area's resources must (1) meet the same standards for significance and suitability that apply to units of the national park system; (2) require some special recognition or technical assistance beyond what is available through existing NPS programs; (3) be managed in accordance with the policies and standards that apply to units of the national park system; and (4) be assured of sustained resource protection, as documented in a formal agreement between the Service and the nonfederal management entity. Designation as a "heritage area" is another option that may be recommended. Heritage areas have a nationally important, distinctive assemblage of resources that is best managed for conservation, recreation, education, and continued use through partnerships among public and private entities at the local or regional level. Either of these two alternatives (and others as well) would recognize an area's importance to the nation without requiring or implying management by the National Park Service.

Appendix C: National Historic Landmark Criteria Sec 65.4

The criteria applied to evaluate properties for possible designation as National Historic Landmarks or possible determination of eligibility for National Historic Landmark designation is listed below. These criteria shall be used by NPS in the preparation, review and evaluation of National Historic Landmark studies. They shall be used by the Advisory Board in reviewing National Historic Landmark studies and preparing recommendations to the Secretary. Properties shall be designated National Historic Landmarks only if they are nationally significant. Although assessments of national significance should reflect both public perceptions and professional judgments, the evaluations of properties being considered for landmark designation are undertaken by professionals, including historians, architectural historians, archeologists and anthropologists familiar with the broad range of the nation's resources and historical themes. The criteria applied by these specialists to potential landmarks do not define significance nor set a rigid standard for quality. Rather, the criteria establish the qualitative framework in which a comparative professional analysis of national significance can occur. The final decision on whether a property possesses national significance is made by the Secretary on the basis of documentation including the comments and recommendations of the public who participate in the designation process.

(a) Specific Criteria of National Significance: The quality of national significance is ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association, and:

1. That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or That are associated importantly with the lives of persons nationally significant in the history of the United States; or
2. That represent some great idea or ideal of the American people; or
3. That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or
4. That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
5. That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

(b) Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past 50 years are not eligible for designation. Such properties, however, will qualify if they fall within the following categories:

1. A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or
2. A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in

the nation's history and the association consequential; or

3. A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation's history and the association consequential; or

4. A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building or structure directly associated with the productive life of that person exists; or

5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or from an exceptionally significant event; or

6. A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or

7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or

8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

Appendix D: Japanese American Wartime Incarceration Properties

Name of Property	Location	Status of Federal/ State Designations[1]	Tangible Recognition: Markers, Monuments, Memorials, and Museums[2]
Wartime Civil Control Administration			
Fresno Assembly Center	Fresno County, CA	No Federal designation, CA Historical Landmark	Marker, 1992; memorial, 2010
Marysville Assembly Center, aka Arboga Assembly Center	Yuba County, CA	No Federal designation, CA Historical Landmark	None known
Mayer Assembly Center	Yavapai County, AZ	No Federal designation	None known
Merced Assembly Center	Merced County, CA	No Federal designation, CA Historical Landmark	Marker, 1982; monument and memorial plaza, 2010
Pinedale Assembly Center	Fresno County, CA	No Federal designation, CA Historical Landmark	Memorial plaza
Pomona Assembly Center	Los Angeles County, CA	No Federal designation, CA Historical Landmark	None known
Portland Assembly Center	Multnomah County, OR	No Federal designation	Marker
Puyallup Assembly Center, aka Camp Harmony	Pierce County, WA	No Federal designation	Memorial courtyard with sculpture and markers
Sacramento Assembly Center, aka Walerga Assembly Center	Sacramento County, CA	No Federal designation, CA Historical Landmark	Marker, 1987; memorial grove of cherry trees
Salinas Assembly Center	Monterey County, CA	No Federal designation, CA Historical Landmark	Marker, 1984; Day of Remembrance Memorial Garden, 2010
Santa Anita Assembly Center	Los Angeles County, CA	Determined eligible for National Register 2006, CA Historical Landmark	Marker
Stockton Assembly Center	San Joaquin County, CA	No Federal designation, CA Historical Landmark	Marker
Tanforan Assembly Center	San Bruno, San Mateo County, CA	No Federal designation, CA Historical Landmark	Marker
Tulare Assembly Center	Tulare County, CA	No Federal designation, CA Historical Landmark	None known
Turlock Assembly Center	Stanislaus County, CA	No Federal designation, CA Historical Landmark	Marker, 2010

[1] Federal designation includes listing in the National Register of Historic Places, designation as a National Historic Landmark, or some other Federal effort to honor the site for its relation to the Japanese American wartime experience.

[2] A marker identifies the site and its relation to the World War II experience of Japanese Americans; text generally is mounted on a post or solid base. A monument is an artistic work that serves as a memorial to the Japanese American wartime experience. A memorial is a space dedicated to the Japanese American wartime experience, and may include landscape, architectural, sculptural, and educational elements. Museums include exhibits that interpret Japanese American wartime experiences.

Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
War Relocation Authority Centers			
Gila River Relocation Center: Butte Camp and Canal Camp	Pinal County, AZ	None	Markers at both camps; memorial exhibit at Gila River Indian Reservation Cultural Center
Granada Relocation Center, aka Amache	Prowers County, CO	National Register 5-18-94; National Historic Landmark 2-10-06; National Historic Site 1-9-07	Cemetery with monument
Heart Mountain Relocation Center	Park County, WY	National Register 12-19-85; National Historic Landmark 9-20-06	Memorial park with markers and honor roll; Interpretive Learning Center, August 2011
Jerome Relocation Center	Chicot and Drew Counties, AR	None	Monument
Manzanar Relocation Center, originally Owens Valley Reception Center	Inyo County, CA	National Register 7-30-76; National Historic Landmark 2-4-85; National Historic Site 1992; CA Historical Landmark 1972	Memorial cemetery; markers; monument; interpretive center
Minidoka Relocation Center	Jerome County, ID	National Register 7-10-79; National Monument 2001; National Historic Site 2008	Monument; markers; exhibit at Jerome County Historical Museum; state marker on State Highway 25
Poston Relocation Center: Poston I, II, and III	La Paz County, AZ	None	Memorial with monument and educational kiosk, 1992
Rohwer Relocation Center	Desha County, AR	National Register 7-30-74	None
Rohwer Memorial Cemetery	Desha County, AR	National Register 7-6-92; National Historic Landmark 7-6-92	Memorial cemetery with monuments and markers
Topaz Relocation Center, aka Central Utah or Abraham Relocation Center	Millard County, UT	National Register 1-2-74; National Historic Landmark 3-29-07	Original monument, 1976; replacement monument, 2002; monument to Topaz soldiers, 2005
Tule Lake Relocation Center	Modoc County, CA	National Register 2-17-06; National Historic Landmark 2-17-06; WWII Valor in the Pacific National Monument 12-5-08; CA Historical Landmark	Monument, 1979; marker and collections at BLM in Klamath Falls, at Modoc County Fairgrounds, and at Lava Beds National Monument
War Relocation Authority Internment/Detention Facilities			
Leupp Isolation Camp	Coconino County, AZ	No Federal designation	None known
Moab Isolation Center	Grand County, UT	National Register 5-2-94 (Dalton Wells CCC Camp/Moab Relocation Center)	None known

Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
Camp Tulelake	Tule Lake National Wildlife Refuge, CA	No Federal designation	None known
War Relocation Authority Centers, Supplementary Sites			
Antelope Springs	BLM/Fillmore, Millard County, UT	No Federal designation	None known
Cow Creek Camp	Death Valley National Park, Inyo County, CA	Cow Creek Historic District, determined NR eligible for association with CCC, 1989	None known
Department of Justice Internment/Detention Facilities			
Catalina Federal Honor Camp	Coronado National Forest, AZ	Named "Gordon Hirabayashi Recreation Site" by U.S. Forest Service, 1999	Interpretive kiosk built by USFS
Crystal City Internment Camp (INS)	Zavala County, TX	No Federal designation	Texas State Marker, 2007; monument, 1980s
Fort Lincoln Internment Camp (INS)	Bismarck, Burleigh County, ND	No Federal designation	None known
Fort Missoula Internment Camp (INS)	Missoula County, MT	National Register 4-29-87	Monument and museum; now called "Historical Museum at Fort Missoula"
Fort Stanton	Lincoln County, NM	National Register 4-13-73	Museum
Kenedy Internment Camp (INS)	Karnes County, TX	No Federal designation	Texas State Subject Marker at camp cemetery; marker in Kenedy; and materials at Kenedy Public Library
Kooskia Internment Camp	Clearwater National Forest, Idaho County, ID	No Federal designation	None known
Old Raton Ranch Camp	Santa Fe County, NM	No Federal designation	None known
Santa Fe Internment Camp	Santa Fe County, NM	No Federal designation	Marker
Seagoville Internment Camp (WRA camp)	Dallas County, TX	No Federal designation	None known
Sharp Park Detention Facility	Pacifica, San Mateo County, CA	No Federal designation	None known
U.S. Federal Penitentiary, Leavenworth	Leavenworth County, KS	No Federal designation	None known
U.S. Federal Penitentiary, McNeil Island	Steilacoom, Pierce County, WA	No Federal designation	None known
U.S. Immigration Station, Ellis Island	New York Harbor, NY	National Register 10-15-66; part of Statue of Liberty National Monument	Exhibit on Japanese American wartime experiences opened in July 2010
U.S. Immigration Station, O'ahu	Honolulu County, HI	National Register 8-14-73	None known

Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
U.S. Army Detention Facilities			
Angel Island, North Garrison of Fort McDowell	Marin County, CA	National Register 10-14-71; National Historic Landmark 12-9-97; CA Historical Landmark; now Angel Island State Park	Markers, monument, and museum
Camp Florence	Florence, Pinal County, AZ	No Federal designation	None known
Camp Forrest	Tullahoma, Coffee County, TN	No Federal designation	None known
Camp Livingston	Alexandria, Rapides Parish, LA	No Federal designation	None known
Camp Lordsburg	Hidalgo County, NM	No Federal designation	Museum nearby
Fort Bliss	El Paso County, TX	National Register 5-7-98 (included in Fort Bliss Main Post Historic District)	None known
Fort George G. Meade	Anne Arundel County, MD	No Federal designation	None known
Fort Richardson	Anchorage Borough, AK	No Federal designation	None known
Fort Sam Houston	San Antonio, TX	National Register 5-15-75; National Historic Landmark 5-15-75 (not for Japanese American association)	None known
Fort Sill Internment Camp	Comanche County, OK	National Register 10-15-66 (not for Japanese American association); National Historic Landmark 12-19-60	None known
Honouliuli Internment Camp	Honolulu County, HI	National Register 2-21-2012	None known
Kilauea Military Camp	Hawai‘i County, HI	No Federal designation	None known
Sand Island Detention Camp	Honolulu County, HI	No Federal designation	None known
Stringtown Internment Camp	Stringtown, Atoka County, OK	No Federal designation	None known
Other Internment/Detention Facilities			
Ha‘ikū Camp	Maui County, HI	No Federal recognition	None known
Hilo Independent Japanese Language School	Hawai‘i County, HI	No Federal designation	None known

Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
Honolulu Police Department and Yokohama Specie Bank	Honolulu County, HI	National Register 6-19-1973 (included in Merchant Street Historic District, not for Japanese American association)	None known
Kalāheo Stockade	Kaua‘i County, HI	No Federal designation	None known
Kaua‘i County Courthouse	Kaua‘i County, HI	National Register 12-17-1981 (included in Līhu‘e Civic Center Historic District, not for Japanese American association)	None known
Lāna‘i City Jail and Courthouse	Maui County, HI	No Federal designation	None known
Līhu‘e Plantation Gymnasium	Kaua‘i County, HI	No Federal designation	None known
Maui County Courthouse and Police Station	Maui County, HI	National Register 8-20-1988 (included in Wailuku Civic Center Historic District, not for Japanese American association)	None known
Maui County Jail	Maui County, HI	No Federal designation	None known
Waiākea Prison Camp	Hawai‘i County, HI	No Federal designation	None known
Wailua County Jail	Kaua‘i County, HI	No Federal designation	None known
Waimea County Jail	Kaua‘i County, HI	No Federal designation	None known

Appendix E: Finding of No Significant Impact

HONOULIULI GULCH AND ASSOCIATED SITES SPECIAL RESOURCE STUDY AND ENVIRONMENTAL ASSESSMENT

Hawai‘i

October 2014

INTRODUCTION

The Department of the Interior, Environment, and Related Agencies Appropriations Act of 2010, Title 1, Section 125 (123 Stat. 2932), October 30, 2009) authorized the National Park Service (NPS) to "conduct a special resource study of the national significance, suitability, and feasibility of including the Honouliuli Gulch and associated sites within the State of Hawai‘i in the National Park System."

The purpose of this special resource study is to determine whether the Honouliuli Gulch and associated sites in Hawai‘i are eligible to be designated as a unit of the national park system. Through the study process, the NPS identified alternative strategies to manage, protect, or interpret the sites' resources. The study conveys information to the U.S. Department of the Interior and Congress to aid in determining whether designation of a unit of the national park system is desirable and appropriate.

The study evaluates 17 sites associated with the history of internment in Hawai‘i. In this study, the NPS ascertained the public's level of interest in nationally recognizing this part of United States history and evaluated whether one or more of the sites would be appropriate for designation as a national park system unit. The NPS identified alternative strategies to manage and protect the resources, and to provide or enhance public understanding, use and enjoyment of the sites. Cost estimates for operations, acquisition and development are also included.

Through this study, the National Park Service finds that the Honouliuli Internment Camp property, located in Honouliuli Gulch, is nationally significant, suitable, feasible, and appropriate for NPS management. This document identifies the selection of the most effective and efficient alternative ("the selected alternative") and the basis for a determination that completion of the study results in no associated significant impacts on the human environment.

PURPOSE AND NEED

The purpose of this study is to comply with the Department of the Interior, Environment, and Related Agencies Appropriations Act of 2010, Title 1, Section 125 (123 Stat. 2932), October 30, 2009) which directed the Secretary of the Interior to conduct a special resource study of Honouliuli Gulch and associated sites described above. The legislation also stated, "The study shall evaluate the Honouliuli Gulch, associated sites located on O‘ahu, and other islands located in the State of Hawai‘i with respect to—

1. the significance of the site as a component of World War II;
2. the significance of the site as the site related to the forcible internment of Japanese Americans, European Americans, and other individuals; and
3. historic resources at the site."

The study follows the process established by the National Park System New Area Studies Act (P.L. 105-391, 16 U.S.C. Sec. 1a-5). This law requires that these studies be prepared in compliance with the National Environmental Policy Act of 1969 (42 U.S.C. §§ 4321- 4347). This study complies with the National Historic Preservation Act, Section 106 and 110 requirements. Section 106 requires federal agencies to take into account the effects of their undertakings on historic properties. At the beginning

of the study process, the NPS initiated a notice of scoping that was published in the Federal Register on May 2, 2011 (Vol.76, No. 83, 24514–15). Through the initial public scoping process, the NPS identified a range of issues to address through the study, as well as impacts of concern to the public.

This study is needed to provide the Secretary of the Interior and Congress with information on opportunities for management of the resources found within the study area. It identifies and analyzes alternatives for the management, administration, and protection of those resources, and evaluates their appropriateness for becoming a unit of the national park system.

STUDY SITES

The study evaluates 17 sites associated with the history of internment in Hawai‘i. The list of sites was developed based on information obtained through personal interviews, declassified documents from the Federal Bureau of Investigation and Department of Justice, military files, newspapers, photographs, and numerous books and essays. The University of Hawai‘i, Japanese Cultural Center of Hawai‘i, and Trans-Sierran Archaeological Research provided information about internment sites in Hawai‘i. Site visits by the study team were conducted where possible to determine current conditions and integrity of the sites.

The sites evaluated include the Honouliuli Internment Camp, Sand Island, the U.S. Immigration Station, Honolulu Police Department, and Honolulu Military Police Station on O‘ahu; the Kilauea Military Camp, Waiākea Prison, and the Hilo Independent Japanese Language School on the island of Hawai‘i; Ha‘ikū Camp and Maui County Jail on Maui; the Kaunakakai Jail on Moloka‘i; the Lāna‘i City Jail on Lāna‘i; and the Kalāheo Stockade, Waimea Jail, Wailua Jail, Līhu‘e Plantation Gymnasium, and Kaua‘i County Courthouse on Kaua‘i.

EVALUATION OF NATIONALLY SIGNIFICANT RESOURCES

The NPS has determined that the internment and incarceration of Japanese Americans and others during World War II on the mainland and in Hawai‘i are nationally significant events that shape our understanding and commitment to civil liberties and the fair treatment of all citizens, regardless of race. By identifying the commonalities and distinctions between mainland and Hawai‘i stories, this study concludes that the internment in Hawai‘i is of national significance, distinct from mainland incarceration. Through it, we are able to more fully understand the abrogation of civil liberties that occurred in the U.S. and its territories.

The NPS has determined that two sites are nationally significant under the National Park Service New Area Studies Act criteria: the Honouliuli Internment Camp and the U.S. Immigration Station.

The Honouliuli Internment Camp was located in Honouliuli Gulch, west of Waipahu, on the island of O‘ahu. Opened in 1943, the Honouliuli Internment Camp was the last, largest, and longest-used World War II confinement site in Hawai‘i. The camp was built to intern Japanese and European Americans, Japanese and European resident aliens, and POWs captured in military operations during World War II. The internment camp held 320 internees, mostly second-generation Japanese Americans, but also Japanese, German, and Italian nationals. It was also the largest prisoner of war camp in Hawai‘i, incarcerating nearly 4,000 individuals. Recent archeological surveys have resulted in the identification of over 130 archeological features. Honouliuli Internment Camp, protected by its isolated location amidst agricultural lands and nearly hidden by dense vegetation for 60 years, appears to offer the greatest potential to preserve resources and interpret the history of the WWII internment.

The U.S. Immigration Station, located on Ala Moana Boulevard in Honolulu, is nationally significant as the location where all Hawai‘i internees were processed or temporarily incarcerated after the attack on Pearl Harbor on December 7, 1941. Unlike most of the other internment sites in Hawai‘i that only served local, short-term needs, the U.S. Immigration Station had a broad, statewide role over an extended period. It served as a temporary internment location, but also as a center of legal administration.

EVALUATION OF SUITABILITY

This study concludes that the Honouliuli Internment Camp and the U.S. Immigration Station, as described in the draft study report, are suitable for inclusion in the national park system, based upon an evaluation of the sites resources and their relative quality, character, and rarity. The Honouliuli Internment Camp and the U.S. Immigration Station contain themes and resources not found in any national park unit or comparably managed area.

EVALUATION OF FEASIBILITY

The study concludes that Honouliuli Internment Camp is feasible as an addition to the national park system if public access to the site can be secured. Current land use, ownership patterns, and zoning associated with Honouliuli Internment Camp would not conflict with management of a national park unit. Primary resources associated with the camp are located on property owned by the Monsanto Company, which has expressed interest in donating the property to the NPS for establishment of a national park unit. Surrounding lands are currently in agricultural use which is compatible with the camp's historic setting. However, feasibility is conditional on securing public access to the site. As current access is primarily over unpaved agricultural roads, improvements would be needed to accommodate access by the general public. An appropriate boundary configuration would include the historic site and would allow for access and visitor facilities.

The study concludes that the U.S. Immigration Station is not feasible as an addition to the national park system because of existing uses by the U.S. Department of Homeland Security and the State of Hawai'i, Department of Public Health. If the facilities were no longer needed by federal or state agencies, additional analysis would be needed to determine the feasibility of management options and associated costs.

NEED FOR NPS MANAGEMENT

The study concludes that there is a need for NPS management of the Honouliuli Internment Camp in partnership with others to fully protect resources and to enhance visitor appreciation of the nationally significant resources and important stories associated with the site. The incorporation of Honouliuli Internment Camp into the national park system would offer a visitor experience that allows the broadest understanding of the resources and stories relating to the internment of Japanese Americans and European Americans in Hawai'i during World War II.

ALTERNATIVES ANALYZED

Two alternatives were analyzed in the *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment*. The alternatives are based on the purpose and need for the project and are consistent with existing laws and NPS policy.

Alternative A: Continuation of Current Management (No Action Alternative)

Sites, organizations, and programs significant to the internment history in Hawai'i would continue to be operated independently by existing landowners, agencies, or organizations without additional NPS management or assistance other than what is currently available through existing authorities and grant programs.

Alternative B: Honouliuli National Historic Site or National Monument—A New Unit of the National Park System

Congress would establish Honouliuli National Historic Site as a new unit of the national park system. Alternatively, a national monument managed by the National Park Service could be established. The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and would allow for access and visitor facilities. The National Park Service would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai'i during World War II. The national historic site or monument would be supported by

operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor. The National Park Service could respond to requests to provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai'i during World War II.

THE SELECTED ALTERNATIVE

National Historic Site or National Monument—A New Unit of the National Park System

The recommendations encompassed in the selected alternative are the same as those identified and analyzed in alternative B in the environmental assessment, with the exception of modifications made as a result of information and comments derived from public review of the draft study and environmental assessment, as follows:

- The proposed national historic site or monument boundary has been reduced at the request of the University of Hawai'i—West O'ahu. Discussions between the NPS and the University of Hawai'i have identified approaches to public access that do not require inclusion of University of Hawai'i land in an NPS boundary at this time. The University of Hawai'i is committed to working with the NPS on granting access to the site over University lands should a national park unit be established. Future road access could be added to the national historic site or monument boundary once a more permanent road alignment has been determined.
- Minor modifications have also been made to address concerns regarding universal access to the site, potential partnerships, and technical assistance opportunities.

The above modifications would not constitute a change in environmental impacts beyond what was analyzed in the environmental assessment.

Concept

The selected alternative would establish Honouliuli National Historic Site as a new unit of the national park system. Alternatively, a national monument managed by the National Park Service could be established. The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that would allow for access and visitor facilities. In collaboration with partners, the National Park Service would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai'i during World War II. The national historic site or monument would be supported by operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor. The National Park Service could respond to requests to provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai'i during World War II.

Proposed Area

The Honouliuli National Historic Site or National Monument would total approximately 155 acres (See Map: Alternative B (Selected Alternative), page 123.) The historic Honouliuli Internment Camp and the adjacent overlook parcel (totaling approximately 123 acres) would be acquired by the NPS through a donation by the Monsanto Company. Additional Monsanto-owned lands (31.5 acres) with related resources could be protected through conservation easements, land transfer, or other measures at Monsanto's discretion. All private property rights would be respected.

The University of Hawai'i has committed to providing NPS with public access to Honouliuli, initially through granting the NPS a right of entry over existing roads from the west. The University of Hawai'i is currently undergoing planning efforts for its lands adjacent to Honouliuli. This process, and subsequent planning by the NPS should a national park unit be established, may identify a new road alignment for public access. Once a desired road alignment for public access has been

determined, this road alignment could be included in the national historic site or national monument through a boundary adjustment. This would allow the National Park Service to expend funds on the development and maintenance of the access road.

Three parcels owned by the City and County of Honolulu Board of Water Supply (totaling 0.6 acres) would be inholdings within the proposed area and would remain under current ownership and management. The communications facilities, non-contributing features within the historic site, would not be included in the proposed boundary.

Management

The NPS would have direct management responsibility for the Honouliuli National Historic Site or National Monument including: 1) interpretation and education associated with the Honouliuli Internment Camp and its resources, including the development of interpretive media and programs; 2) preservation and resource management for the historic site; and 3) operational facilities and infrastructure such as roads, restrooms, and trails.

Resource Protection

NPS staff would protect and preserve resources related to Honouliuli Internment Camp. Management plans would guide appropriate historic preservation documentation and treatments. As described below, there are opportunities to partner with local institutions and organizations in the protection of resources.

Visitor Experience

Visitors would have the opportunity to learn about Honouliuli Internment Camp, World War II internment in Hawai‘i, martial law, civil liberties, and peace and reconciliation through a wide variety of interpretive and educational programs onsite and at offsite locations. Interpretation would be accessible and relevant to diverse audiences and multiple generations. Virtual visitor experiences would be explored so that people could learn about and experience Honouliuli and related sites without actually visiting the sites. Programs could be provided by NPS rangers, partners, and volunteers. Information could be presented in multiple languages.

Partnerships

Other entities, specifically University of Hawai‘i—West O‘ahu and the Japanese Cultural Center of Hawai‘i, have completed significant work to document, preserve, and interpret the Honouliuli Internment Camp and the larger history of internment in Hawai‘i during World War II. The NPS would seek to maintain these partnerships for future management of the Honouliuli National Historic Site or Monument. In addition, the NPS would explore, develop, and maintain new partnerships for the preservation and interpretation of Honouliuli Internment Camp and related sites, features, and stories in Hawai‘i.

There are substantial opportunities for partnerships related to Honouliuli National Historic Site or Monument with public agencies, educational institutions, nonprofit entities, and individuals. Potential partnership projects could include the development of educational programs, development of facilities, resource stewardship activities such as preservation of historic features and vegetation clearing, and research projects. Partnerships could also include shared facilities for interpretation, curatorial storage, operations, and maintenance.

Technical Assistance

World War II-era internment and incarceration sites in Hawai‘i other than Honouliuli Internment Camp would continue to be owned and managed by their respective public and private owners. The associated sites illustrate the broad-reaching effects of internment on the six major islands in Hawai‘i and are valuable in accurately interpreting this history.

Upon request, the NPS could work cooperatively with associated site owners and managers to explore opportunities for interpretation and/or preservation of the associated sites. Any request for technical assistance related to the associated sites would be voluntary on the part of the landowner.

Where appropriate, the NPS could also conduct research and respond to requests for assistance to related sites that have yet to be identified.

Operations

Staffing

Honouliuli National Historic Site or Monument would be managed through World War II Valor in the Pacific National Monument at Pearl Harbor, given its close proximity and related history. Some staff positions at World War II Valor in the Pacific National Monument would be shared. However, management of the site would require additional staff as funding became available. A management plan would identify priorities, management emphases, and required staffing for a 15 to 20 year timeframe.

Based on comparisons of staffing levels for existing national historic sites of similar scale and management models, the following types of staff would be recommended:

- Site manager
- Cultural resource specialist
- Interpretive specialist
- Interpretive ranger (2)
- Law enforcement ranger
- Maintenance (2)
- Exotic plant management technician

Positions could be permanent, temporary, or seasonal. In addition, partner organizations could provide staff or volunteers, with types and numbers dependent upon the functions provided.

Operational and Visitor Facilities

Comprehensive management planning would guide the development of facilities for Honouliuli National Historic Site or National Monument. Facilities would be needed to support public access, circulation, orientation, and learning about the history of internment in Hawai‘i. The 7-acre overlook site could serve as a visitor staging area with ample space to provide for parking, visitor drop-off, interpretive features, and restrooms. The site is located just outside of the historic camp and offers views to Pearl Harbor, downtown Honolulu, and Diamond Head. Within the gulch, visitor facilities would be minimal to preserve the site's historic integrity. Facilities might include trails, interpretive waysides, primitive roads, and vault toilets. Implementation planning would also explore opportunities for persons of all abilities to access and experience Honouliuli Internment Camp.

Currently there is no public access to Honouliuli Internment Camp. Rights of access would be required to provide public access to the 7-acre overlook parcel and the historic site. Existing roads would require considerable improvement to accommodate visitor access. As noted above, the University of Hawai‘i has indicated its commitment to working with the National Park Service with regard to providing public access on existing and future roads through its lands.

The Federal Highway Administration (FHA) estimated construction costs for public and administrative access using existing road alignments would range from $3 to 20 million. This dollar amount would also include parking and turnaround areas for buses. The higher end of the range would be incurred if additional reconstruction or realignment is necessary for road improvements. Costs would need to be reevaluated after a formal site survey and through completion of a comprehensive management plan.

Shuttle or bus service from either World War II Valor in the Pacific National Monument or UHWO was also evaluated by the FHA. Costs to operate a bus connection from World War II Valor in the Pacific National Monument three times per week were estimated at $25,000 to 30,000 annually. Costs to operate a bus or shuttle from University of Hawai‘i—West O‘ahu twice daily were estimated at $91,000 to 112,000 annually.

NPS management of a national historic site at Honouliuli Gulch would be funded through federal appropriations as part of the annual NPS budget and through potential partners and grants. The national historic site or monument could share administrative, visitor, and operational facilities with World War II Valor in the Pacific National Monument or partner entities. Non-federal entities would continue to be eligible for the grants through the Japanese American Confinement Sites Grant Program for preservation, interpretation, and documentation projects associated with Honouliuli Internment Camp.

Based on the size and scope of this site, and the types of services and assistance proposed, the annual cost of NPS operations for the national historic site could be expected to be $400,000 to $750,000. The estimated operational budget would primarily fund NPS staff, programs, projects, and outreach.

Specific costs would be reevaluated in subsequent, more detailed planning for the unit. Planning would consider facility and site design, detailed identification of resource protection needs, and changing visitor expectations. Actual costs to the NPS would vary depending on timing and implementation and contributions by partners and volunteers. It is assumed that the long-range financial needs of Honouliuli National Historic Site or Monument would not just rely upon federally appropriated funds. A variety of other public and private funding sources could be sought by the NPS to assist in implementation efforts. Other NPS units have successfully found partners to help with funding major projects, and some of the costs associated with actions in the alternatives may prove to be less expensive if donated materials, labor, and other support can be secured.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The “environmentally preferred” alternative is the course of action that would best protect, preserve and enhance historic, cultural and natural resources, and that would cause the least damage to the biological and physical environment. The environmentally preferred alternative is not the same as an agency’s “preferred” or “most effective and efficient” alternative. The NPS has determined that the selected alternative, Alternative B: Honouliuli National Historic Site or Monument—A Unit of the National Park System, would be the environmentally preferable alternative because it would protect the nationally significant cultural resources and natural resources and provide opportunities for visitors to learn about the history and experience of Japanese American and European American incarceration during World War II.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE QUALITY OF THE HUMAN ENVIRONMENT

The NPS has determined that the selected alternative can be recommended with no significant adverse effects on biological resources, cultural resources, recreation resources, socioeconomics, land use, or water resources. This determination is based on the environmental impact analysis published in the draft study report which examined the effects of Alternative A: Continuation of Management and Alternative B: Honouliuli National Historic Site or Monument—A Unit of the National Park System.

As defined in 40 CFR § 1508.27, significance of impacts is determined by examining the ten criteria below.

Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.

The NPS evaluated the potential environmental consequences of each alternative related to the following topics: cultural resources; visitor use and experience; socioeconomics; land use; and water resources. A range of minor impacts and beneficial effects is associated with the selected alternative (alternative B).

Environmental effects would generally be beneficial. The impact analysis for all alternatives is necessarily broad to avoid speculation as to site-specific impacts, given the broad nature of the study. The outcome of the study is a recommendation to Congress. If Congress enacts the recommendations in this study, then specific actions would be developed and new environmental analyses would be undertaken prior to implementation.

With the establishment of a national park unit, the nationally significant cultural resources within the Honouliuli Gulch would be protected under federal law. The technical assistance provided by the National Park Service to the related sites would be a benefit to the cultural resources at those sites with the development of preservation planning efforts.

An access and transportation plan would be developed as part of planning for the new national park unit. These plans would be beneficial to the protection of the site and the visitor experience.

Visitor opportunities would be planned and developed at the site providing a positive visitor experience. Effective planning of the visitor opportunities will provide protection to the cultural and natural resources.

There will be beneficial impacts on socioeconomics to local communities. Commercial services available in the developing University of Hawai‘i—West O‘ahu area could benefit from increased heritage-related tourism.

The selected alternative would benefit the biological resources by improving the protection of water quality and developing a plan for and managing nonnative vegetation.

The degree to which the proposed action affects public health or safety.

Because this level of study does not lend itself to meaningful environmental analysis of this topic, the topic was dismissed from additional analysis.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The study area is surrounded by ALISH (Agricultural Lands of Importance to the State of Hawai‘i) and the area immediately adjacent to the Honouliuli Gulch is considered prime and unique farmland. If Honouliuli Gulch becomes a unit of the national park system, there will be close coordination with surrounding land owners and no adverse impacts to resources have been identified.

The Honouliuli Internment Camp and the U.S. Immigration Station have been evaluated and identified as being nationally significant by the National Historic Landmarks Program. The establishment of Honouliuli Internment Camp as a national park unit will provide preservation to these significant resources.

The degree to which effects on the quality of the human environment are likely to be highly controversial.

No highly controversial effects, resulting from actions proposed in the alternatives, have been identified during either initial public scoping, preparation of the environmental assessment, or the public review period. The vast majority of comments supported selection of alternative B.

The degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

There were no highly uncertain, unique or unknown risks identified during either the preparation of the environmental assessment or the public review period.

The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The study does not establish a precedent for future actions or represent a decision in principle because it only offers findings, based on completion of a prescribed evaluation process. These findings may be conveyed by the Secretary as recommendations to Congress. Development of specific actions responsive to the recommendations would require congressional or presidential establishment of a national park unit and would subsequently be refined through a management planning process, including unit-specific environmental analysis, if established.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Other past, present, or reasonably foreseeable actions were analyzed for their potential to contribute to cumulative impacts in association with implementation of the selected alternative, if enacted by Congress.

The effects of the selected alternative would comprise a very small component of these cumulative impacts, given the size and scope of the landscape within and surrounding the study area. Overall, the predominantly beneficial impacts of the selected alternative, combined with the negligible to major adverse impacts from other past, present, and reasonably foreseeable future actions, would not result in a significant cumulative adverse effect.

The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.

In general, the selected alternative would result in beneficial effects to the National Register of Historic Places properties and other significant scientific, cultural or historical resources. The overall intent of establishing a National Park Service unit at this site is to protect and preserve the significant cultural resources that are present. There could be minor impacts to cultural resources through improvements at the site for the health and safety of employees and visitors, but every effort will be made to avoid, minimize or mitigate these impacts.

Increased education and interpretation programs will result in a broader understanding of the significant cultural resources at the site and will likely result in greater preservation.

The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

There are no threatened or endangered species in the area, therefore, this topic was not analyzed in the study.

Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The selected alternative would not violate federal, state, or local environmental protection laws.

PUBLIC ENGAGEMENT

Public Scoping

The NPS initiated public scoping for this study in February 2011. The scoping process included meetings with agencies, elected officials and organizations, public meetings and workshops, newsletters, a web page, and written public comments. These sources were used to identify the issues, significant resources, ideas for alternatives, and impact topics to be considered for environmental analysis.

The NPS study team used a variety of methods to notify the public and stakeholders of the study initiation. The NPS produced and distributed newsletters to the media, individuals, organizations, and government officials. The purpose of the newsletter was to introduce the study, explain the process to community members, and solicit comments on issues the study should address. The newsletter was published and made available for comment on the National Park Service's Planning, Environment and Public Comment (PEPC) website. Press releases announcing the beginning of the study process and the public meeting schedule were distributed to local media. Numerous articles and opinion pieces about the study have appeared in area newspapers.

In February and March 2011, the study team held a series of public scoping meetings on the six main islands in Hawai'i. The meetings were held in Waipahu, Kailua-Kona, Hilo, Kaunakakai, Lāna'i City, Kahului, Līhu'e, and Honolulu. The meetings were attended by more than 100 people who provided comments on the scope of the study and information about the internment sites. Additional input was gathered through meetings and conversations with various individuals, agencies, organizations, cities, and local, state and federal elected officials. The NPS received comments via written letters and through e-mail.

The comment period extended to June 1, 2011, 30 days after publication of the notice of scoping in the *Federal Register*.

Public comments predominantly expressed the desire to commemorate the internment experience in Hawai'i. People felt that internment and incarceration during World War II is an important part of Hawaiian history and noted the differences between the experiences of Japanese Americans on the mainland. Most stated that there are important lessons to be learned from this history. Commenters expressed strong support for partnerships and preservation of Honouliuli Internment Camp and associated sites' resources. They also specifically expressed strong support for NPS management and involvement at the sites, particularly at Honouliuli Gulch.

Draft Report

The National Park Service (NPS) released the *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment* (draft study report/EA) on May 8, 2014. The public comment period was open from May 8 to July 15, 2014.

The NPS announced the release of the draft study report, public comment period, and public meetings through press releases. The NPS sent study reports to agencies, organizations, government representatives, and stakeholders. Paper and e-newsletters were sent to approximately 800 contacts. The project was launched on the NPS Planning, Environment, and Public Comment (PEPC) website and project website (www.nps.gov/pwro/honouliuli). These websites provided downloadable versions of the draft study report/EA, background information about the study, and an online form to receive public comments. The public was invited to submit comments by mail, e-mail, fax, online, at public workshops, and during an online public meeting.

In May and June 2014, the study team held a series of public meetings to present the draft study report and receive comments. The meetings were held in Kapolei, Honolulu, Līhu'e , Kaunakakai, Kahului, Lāna'i City, and Hilo. The public meetings in the Hawaiian Islands and the online public meeting were attended by 256 people.

The NPS received comments from over 3,100 individuals, agencies, elected officials, and organizations. Approximately 95% of the comments were submitted as a result of an organized campaign initiated by the National Parks Conservation Association in support of alternative B, which proposes the designation of Honouliuli Internment Camp as a unit of the national park system. Sixty-four individual comments were submitted via written letters, comment forms, e-mail, and through the PEPC online comment system.

The vast majority of the individual public comments also supported alternative B, the designation of Honouliuli Internment Camp as a unit of the national park system. Commenters overwhelmingly cited the need to preserve the story of Hawai'i's World War II internment history and ensure protection of the site in perpetuity. Most wanted partners to be involved in the long-term care, interpretation, and public outreach for Honouliuli and the internment history in Hawai'i. There were also comments about ensuring resource protection, additional historical information about the associated sites, concern about public access to Honouliuli, and ideas for visitor use if Honouliuli Internment Camp is to become a unit of the NPS.

A public comment and response report summarizing comments received by the National Park Service during the public comment period is available on the study website at www.nps.gov/pwro/honouliuli.

Agency Consultation

The National Park Service sent letters to the following agencies, organizations and businesses, and elected officials in May 2014 to notify them of the study process and to seek their input:

Federal Agencies and elected Officials

Advisory Council on Historic Preservation
Congressional Representatives
- Senator Brian Schatz
- Senator Mazie K. Hirono
- Congresswoman Tulsi Gabbard
- Congresswoman Colleen Hanabusa

U.S. Department of Homeland Security
U.S. Department of Interior, Office of Native Hawaiian Relations
U.S. Fish and Wildlife Service

State and Local Agencies and Elected Officials

City and County of Honolulu Planning
Governor Neil Abercrombie
Honolulu County
Honouliuli Park Site Advisory Committee
Senator Mike Gabbard
Senator Will Espero
Representative Richard Lee Fale
Department of Business, Economic Development, and Tourism
Department of Land and Natural Resources
- State Historic Preservation Division
- State Parks Division

Department of Hawaiian Home Lands

Businesses, Institutions, and Organizations

ʻAhahui Siwila Hawaiʻi O Kapolei
Bishop Museum
Hawaiʻi Historical Society
Historic Hawaiʻi Foundation
Japanese American Citizens League
Japanese American National Museum
Japanese Cultural Center of Hawaiʻi
Kapolei Community Development Corporation
Monsanto Company
National Parks Conservation Association
National Parks Foundation
National Trust for Historic Preservation
Office of Hawaiian Affairs
Pacific Historic Parks
Society of Hawaiian Archaeology
University of Hawaiʻi–Mānoa
University of Hawaiʻi–West Oʻahu
Select public libraries in the Hawaiian Islands

Section 106

To comply with NPS responsibilities for Section 106 of the National Historic Preservation Act, at the time of release of the draft study in May 2014, the NPS requested consultation by the State Historic Preservation Division to seek concurrence on 1) recognition of the special resource study undertaking, 2) the area of potential effect, 3) identification of historic properties within the Honouliuli Gulch area, and 4) finding of No Adverse Effect to historic properties. The State Historic Preservation Division concurred with these findings in a letter dated September 23, 2014.

FINDINGS

The NPS has determined that completion of this special resource study and recommendation of the most effective and efficient alternative to the Director does not constitute an action that normally requires an Environmental Impact Statement (EIS). The findings of the study will not have a significant effect on the human environment and no major environmental impacts are foreseen. There are no significant adverse impacts on public health, public safety, threatened or endangered species, historic properties either listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation will not violate any federal, state, or local environmental protection law. This determination also included due consideration of the supportive nature of the public comments and agency, tribal and county recommendations which were received. Based on the foregoing, it has been determined that an environmental impact statement is not required for this special resource study and thus will not be prepared.

Approved:

10/15/2014

Christine S. Lehnertz — Date
Pacific West Regional Director

Appendix F: Errata

August 2015

The following errata provide factual corrections, additions, and revisions to the Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment *(draft study report/EA), dated May 2014. Changes to the draft study report/EA, and references to the page number where the change has occurred are provided. The reader must have access to a copy of the draft study report/EA in order to fully understand the changes.*

These changes have been incorporated into the final study report.

Copies of the draft and final study reports can be downloaded from the internet at www.nps.gov/pwro/honouliuli.

INTRODUCTION

The following document includes errata, organized by chapter, that correct and add factual information to the May 2014 *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment* (draft study report/EA). Attach this document to the draft study report/EA to comprise a full and complete record of the environmental impact analysis. The NPS did not identify any changes that would result in the determination of significant impacts. A Finding of No Significant Impact was completed for the study in October 2014.

Underlined text is new information added to the draft report, while text struck out is deleted.

Hawaiian diacritical marks were updated throughout the report to conform to the Hawai‘i Board on Geographic Names database.

FRONT MATTER

Abstract, 1st paragraph, 1st sentence, revised as follows:

The National Park Service (NPS) prepared the *Honouliuli Gulch and Associated Sites ~~Draft~~ Special Resource Study and Environmental Assessment* to determine whether the Honouliuli Internment Camp and associated World War II internment sites in Hawai‘i are nationally significant, suitable, and feasible for inclusion in the national park system.

Abstract, 7th paragraph, 1st sentence, revised as follows:

The NPS evaluated two alternatives in the ~~draft~~ study.

Abstract, Alternative B paragraph, 3rd sentence, revised as follows:

The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that provide ~~road~~ access and opportunities for visitor facilities.

EXECUTIVE SUMMARY

Page xii, right column, 2nd paragraph, 1st sentence, revised as follows:

On the mainland ~~West Coast~~, all individuals of Japanese ancestry living in California, southern Arizona, the western halves of Washington and Oregon, and the territory of Alaska ~~—two-thirds of them American-born citizens—~~were forced from their homes by military exclusion orders following ~~under~~ Executive Order 9066, issued on February 19, 1942. They were rounded up and sent to temporary detention centers and then to ~~before being sent to live out the remainder of the war at~~ isolated large-scale camps located throughout the western states and Arkansas, where most would spend the duration of the war years. The mass incarceration of 120,000 persons of Japanese ancestry was the largest forced removal of people in the history of the United States.

Page xii, right column, 3rd paragraph, 2nd sentence, revised as follows:

The camp held approximately 400 ~~320~~ internees and became the largest prisoner-of-war camp in Hawai‘i with nearly 4,000 individuals from Korea, Okinawa, Taiwan, Japan, and Italy.

Page xiv, left column, last paragraph, 1st sentence, revised as follows:

The internment camp held approximately 400 ~~320~~ internees, mostly second-generation Japanese Americans, but also Japanese, German, and Italian nationals.

Page xvii, left column, 1st paragraph, last sentence, revised as follows:

An appropriate boundary configuration would include the historic site and lands sufficient to provide ~~site~~ access and ~~public staging~~ visitor facilities such as parking areas.

Page xvii, left column, 5th paragraph, 1st sentence, revised as follows:

The NPS finds that the **U.S. Immigration Station** is not feasible as an addition to the national park system because of existing uses by the U.S. Department of Homeland Security and the Hawai‘i State Department of Health ~~State of Hawai‘i, Department of Public Health~~.

Page xviii, left column, 1st paragraph, revised as follows:

~~Given the U.S. Immigration Station's prominent location in downtown Honolulu, interpretive features located near the sidewalk and bus stop on Ala Moana Boulevard could provide information about this site's historical significance.~~ Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration.

Page xviii, right column, 3rd paragraph, 1st sentence, revised as follows:

The study team developed two alternatives for the draft study report/environmental assessment (EA), based on information gathered from public and stakeholder input, internal NPS discussions, evaluation of special resource study criteria, historical research, and NPS management models.

Page xviii, right column, additional text to follow 4th paragraph:

The Selected Alternative

National Historic Site or National Monument—A New Unit of the National Park System

The recommendations encompassed in the selected alternative are the same as those identified and analyzed in alternative B in the draft study report/EA, with the exception of modifications made as a result of information and comments derived from public review of the draft study report/EA, as follows:

- The proposed national historic site or monument boundary has been reduced at the request of the University of Hawai‘i. Discussions between the NPS and the University of Hawai‘i have identified approaches to public access that do not require inclusion of University of Hawai‘i lands in an NPS boundary at this time. The University of Hawai‘i is committed to working with the NPS on granting access to the site over university lands should a national park unit be established. Future road access could be added to the national historic site or monument boundary once a more permanent road alignment has been determined.
- Minor modifications have also been made to address ~~public~~ concerns regarding universal access to the site, potential partnerships, and technical assistance opportunities.

The above modifications would not constitute a change in environmental impacts beyond what was analyzed in the environmental assessment.

Page xix, left column, before 2nd paragraph, insert additional paragraph:

Local organizations and institutions have been active in documentation, preservation, and interpretation efforts for Honouliuli Internment Camp. The Japanese Cultural Center of Hawai‘i (JCCH) has conducted extensive research and uncovered the location of Honouliuli Internment Camp and other related sites. The JCCH maintains the largest repository of archives and collection items related to Honouliuli and the internment history in Hawai‘i. University of Hawai‘i—West O‘ahu faculty and students have also played a significant role in researching the history of Honouliuli and conducting archeological surveys. In 2012, the Hawai‘i State legislature commissioned an advisory group, called the Honouliuli Park Site Advisory Committee, to support preservation of the Honouliuli site. The advisory group was directed to: 1) provide state support toward preservation of the Honouliuli site; 2) establish a mechanism to leverage county, state, federal, and private funding for an educational resource center at the site; and 3) memorialize the struggle for civil rights by Hawai‘i’s people.

Page xxi, left column, 3rd paragraph, 1st sentence, revised as follows:

Honouliuli Internment Camp and other associated sites would continue to be eligible for grants through the Japanese American Confinement Sites ~~(~~(JACS) Grants Program.

Page xxi, left column, 3rd paragraph, 2nd sentence, revised as follows:

Public Law ~~a~~109-441 (16 USC 461) established the JACS Grant Program for the preservation and interpretation of U.S. confinement sites where Japanese Americans were incarcerated during World War II.

Page xxi, left column, 4th paragraph, last sentence, revised as follows:

Since its establishment in 2006, ~~T~~the JACS Grant Program has awarded more than $15 ~~approximately $12.4~~ million ~~dollars~~ in grants as of fiscal year 2014 ~~2013~~.

Page xxi, left column, 5th paragraph, before last sentence, insert:

California-based CyArk received a grant of $39,020 to digitally document Honouliuli.

Page xxi, left column, 5th paragraph, last sentence, revised as follows:

Under the no action alternative, organizations would continue to obtain assistance from the JACS ~~JACs~~ Grant Program.

Page xxii, Table 1: Existing Management of Sites Evaluated in the Study, Nationally Significant Sites, 3rd column, 2nd row, revised as follows:

Hawai‘i State Department of ~~Public~~ Health

Page xxii, Table 1: Existing Management of Sites Evaluated in the Study, Sites Listed or Potentially Eligible for Listing in the National Register of Historic Places, 4th row, revised as follows:

~~Maui County Jail, Courthouse, and Police Station~~	~~Primary, Maui~~	~~Public, Maui County~~	~~None~~

Page xxii, Table 1: Existing Management of Sites Evaluated in the Study, Sites Listed or Potentially Eligible for Listing in the National Register of Historic Places, 1st row, revised as follows:

Honolulu Police Department	Secondary, O‘ahu	Public, City and County of Honolulu	None

Page xxii, Table 1: Existing Management of Sites Evaluated in the Study, Potentially Significant Sites-Additional Research Needed, 1st row, revised as follows:

Waiākea Prison Camp	Secondary, Island of Hawai'i	Private ~~Exact Location Unknown~~	None

Page xxii, Table 1: Existing Management of Sites Evaluated in the Study, Potentially Significant Sites-Additional Research Needed, last row, revised as follows:

Maui County Courthouse and Police Station	Secondary, Maui	Public, Maui County	None

Page xxii, Table 1: Existing Management of Sites Evaluated in the Study, Other Related Sites- No Integrity Remaining, revised as follows:

Sand Island Detention Camp	Primary, O'ahu	Public, State of Hawai'i	None/Non-Extant
Wailua Jail	Primary, Kaua'i	Public	None/Non-Extant
Waimea Jail	Primary, Kaua'i	Public	None/Non-Extant
Kaunakakai Jail and Courthouse	Secondary, Moloka'i	Public	None/Non-Extant
Maui County Jail	Primary, Maui	Public, Maui County	None/Non-Extant

Page xxiii, left column, heading, revised as follows:

Alternative B (Selected Alternative): Honouliuli National Historic Site or National Monument—A New Unit of the National Park System

Page xxiii, left column, 1st paragraph, 3rd sentence, revised as follows:

The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that ~~provide road~~ would allow for access and ~~opportunities for~~ visitor facilities.

Page xxiii, left column, 1st paragraph, 4th sentence, revised as follows:

In collaboration with partners, the National Park Service would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai'i during World War II.

Page xxiii, left column, 1st paragraph, 6th sentence, revised as follows:

The National Park Service could respond to requests to provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai'i during World War II.

Page xxiii, right column, Proposed Area, revised as follows:

The Honouliuli National Historic Site or National Monument would total approximately ~~440~~ 155 acres. The historic Honouliuli Internment Camp and the adjacent overlook parcel (totaling approximately 123 acres) would be acquired by the NPS through a donation by the Monsanto Company. Additional Monsanto-owned lands (31.5 acres) with related resources ~~would~~ could be protected through conservation easements ~~or land acquisition~~, land transfer, or other measures, at Monsanto's discretion. ~~Adjacent parcels (285 acres) owned by the University of Hawai'i would also be included in the boundary of the historic site to provide flexibility inestablishing public access to the site (NPS can only expend funds on roads within an authorized boundary unless Congressional~~

~~legislation authorizes the use of funding for road maintenance on non-federally owned lands). Options for the University of Hawai‘i parcels could include the University of Hawai‘i maintaining ownership of the property, granting an easement to the NPS, or transferring ownership to the NPS by donation, exchange, or sale. Conservation easements could also be obtained for parcels directly adjacent to Honouliuli Internment Camp. Future development of road Easement 6134 could also provide opportunities for site access.~~ All private property rights would be respected.

The University of Hawai‘i has committed to providing NPS with public access to Honouliuli, initially through granting the NPS a right of entry over existing roads from the west. The University of Hawai‘i is currently undergoing planning efforts for its lands adjacent to Honouliuli. This process and subsequent planning by the NPS should a national park unit be established may identify a new road alignment for public access. Once a desired road alignment for public access has been determined, this road alignment could be included in the national historic site or national monument through a boundary adjustment. This would allow the National Park Service to expend funds on the development and maintenance of the access road.

~~Several~~ Three parcels owned by the City and County of Honolulu Board of Water Supply (totaling 0.6 acres) would be inholdings within the proposed area and would remain under current ownership and management. The communications ~~site~~ facilities, non-contributing features within the historic site, would not be included in the proposed boundary.

Page xxiv, left column, 3rd paragraph, 1st sentence, revised as follows:

The NPS would have direct management responsibility for the Honouliuli National Historic Site or National Monument including: 1) interpretation and education associated with the Honouliuli Internment Camp and its resources, including the development of interpretive media and programs; 2) preservation and resource management for the historic site; and 3) operational facilities and infrastructure such as roads, restrooms, and trails.

Page xxiv, left column, 4th paragraph, revised as follows:

NPS staff would protect and preserve ~~the~~ resources ~~and setting of~~ related to Honouliuli Internment Camp. Management plans would guide appropriate historic preservation documentation and treatments. As described below, there are opportunities to partner with local institutions and organizations in the protection of resources. ~~The NPS would seek out partnership opportunities with existing organizations that have conducted research and documentation of the site. These include the Japanese Cultural Center of Hawai‘i, which maintains the largest repository of archives and collection items related to Honouliuli and the internment in Hawai‘i, and the University of Hawai‘i—West O‘ahu, whose faculty and students have been actively involved in researching the history of the site and conducting archeological field schools at Honouliuli.~~

Page xxiv, right column, 2nd paragraph, before 1st sentence, additional text as follows:

Other entities, specifically the University of Hawai‘i—West O’ahu and the Japanese Cultural Center of Hawai‘i, have done significant work to document, preserve, and interpret the Honouliuli Internment Camp and the larger history of internment in Hawai‘i during World War II. The NPS would seek to maintain these partnerships for future management of the Honouliuli National Historic Site or Monument. In addition, the NPS would explore, develop, and maintain new partnerships for the preservation and interpretation of Honouliuli Internment Camp and related sites, features, and stories in Hawai‘i.

Page xxiv, right column, 3rd paragraph, last sentence, revised as follows:

~~Possible partners include but are not limited to the University of Hawai‘i- West O‘ahu and the Japanese Cultural Center of Hawai‘i.~~

Page xxiv, right column, 4th paragraph, 1st sentence, revised as follows:

World War II-era internment and incarceration sites in Hawai'i other than Honouliuli Internment Camp would continue to be owned and managed by their respective public and private owners.

Page xxiv, right column, 4th paragraph, 2nd sentence, revised as follows:

The associated sites illustrate the broad-reaching effects of internment on the six major islands in Hawai'i and are ~~essential~~ valuable in accurately interpreting this history.

Page xxiv, right column, 5th paragraph, after 3rd sentence, revised as follows:

The NPS could contribute to further evaluation of the U.S. Immigration Station as a national historic landmark and explore opportunities to interpret its significance through waysides and exhibits in cooperation with site owners and managers.

Page xxiv, right column, 5th paragraph, 1st sentence, revised as follows:

Upon request, the NPS could work cooperatively with associated site owners and managers to explore opportunities for interpretation and/ or preservation of the associated sites.

Page xxiv, right column, 5th paragraph, 2nd sentence, revised as follows:

~~For example, the U.S. Immigration Station played a central role in the internment process. Almost every person interned passed through the U.S. Immigration Station either for initial detention, processing for transfer to internment camps on O'ahu and the mainland, or for hearings and trials. The NPS could contribute to further evaluation of the U.S. Immigration Station as a national historic landmark and explore opportunities to interpret its significance through waysides and exhibits.~~

Page xxiv, right column, 5th paragraph, after 3rd sentence, additional text as follows:

Any request for technical assistance related to the associated sites would be voluntary on the part of the landowner.

Page xxv, left column, 1st paragraph, 1st sentence, revised as follows:

Where appropriate, the NPS could also conduct research and respond to requests ~~provide~~ for assistance to related sites that have yet to be identified.

Page xxv, left column, 2nd paragraph, 1st sentence, revised as follows:

~~Management of~~ Honouliuli National Historic Site or Monument would be managed through World War II Valor in the Pacific National Monument at Pearl Harbor, given its close proximity and related history.

Page xxv, right column, 2nd paragraph, 3rd sentence, revised as follows:

The 7-acre overlook site could serve as ~~an excellent location for~~ a visitor staging area with ample space to provide for parking, visitor drop-off, interpretive features, and restrooms.

Page xxvi, left column, 1st paragraph, insert after last sentence:

Implementation planning would also explore opportunities for persons of all abilities to access and experience Honouliuli Internment Camp.

Page xxvi, left column, 2nd paragraph, revised as follows:

Currently there is no public access to Honouliuli Internment Camp ~~does not currently exist because it is located on private property~~. Rights of access would be required to provide public access to the 7-acre overlook parcel and the historic site. Existing roads would require considerable improvement

to accommodate visitor access. As noted above, the University of Hawai'i has committed to working with the National Park Service with regard to providing public access on existing and future roads through its lands.

Page xxvi, right column, 2nd paragraph, revised as follows:

Specific costs would be reevaluated in subsequent, more detailed planning for the unit. Planning would consider facility and site design, detailed identification of resource protection needs, and changing visitor expectations. Actual costs to the NPS would vary depending on timing and implementation and contributions by partners and volunteers. It is assumed that ~~meeting~~ the long-range financial needs of Honouliuli National Historic Site or Monument would not just rely upon federally appropriated funds. A variety of other public and private funding sources could be sought by the NPS to assist in implementation efforts. Other NPS units have successfully found partners to help with funding major projects, and some of the costs associated with actions in the alternatives may prove to be less expensive ~~when~~ if donated materials, labor, and other support can be secured ~~are forthcoming~~.

Page xxvii, left column, 4th paragraph, last sentence, revised to include numbers instead of bullet points:

The CEQ (46 FR 18026 – 46 FR 18038) provides direction that the "environmentally preferable alternative is the alternative that would promote the national environmental policy as expressed in NEPA's Section 101," including:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NEPA Section 101(b)).

CHAPTER 1: INTRODUCTION

Page 3, left column, 3rd paragraph, additional text to follow:

The Selected Alternative

The National Park Service special resource study process requires that the study identify the alternative or combination of alternatives that in the professional judgment of the NPS Director is most effective and efficient in protecting significant resources and providing for visitor enjoyment. Based on public and stakeholder input and professional judgment, the NPS selected alternative B, the action alternative, which would provide for the establishment of a national historic site or national monument. The National Park Service has determined this to be the most effective and efficient alternative in protecting significant resources and providing for visitor enjoyment.

Page 3, left column, 4th paragraph, revised as follows:

Chapter 8: Consultation and Coordination describes the public involvement and agency consultation that took place during the special resource study process.The public comment period for ~~Publication of~~ the ~~*Draft*~~ *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment* ~~will be followed by a 60-day public comment period~~ was open from May 8 to July 15, 2014. Comments received have been incorporated into this final study report. ~~The NPS study team will then complete a~~ A Finding of No Significant Impact (Appendix E) and errata to the draft study report (Appendix F) were completed by the NPS study team, which will ~~which could include corrections to the study and environmental assessment, and~~ transmit ~~it~~ them with the report to the Secretary of the Interior. The Secretary will ~~transmit~~ submit the ~~report~~ final special resource study to Congress, along with the Secretary's recommendations for the area.

CHAPTER 2: HISTORICAL OVERVIEW AND RESOURCES

Page 5, right column, 3rd paragraph, last sentence, revised as follows:

With the passage of the Immigration Act of 1924, immigration from Japan (and other countries and territories in the Asia Pacific) was terminated. The ban remained with few alterations until the Immigration and Nationality Act of 1965.

Page 6, left column, 1st paragraph, 3rd sentence, revised as follows:

In Europe, the U.S. allied with Britain against the Axis nations and readied itself for possible war in the Pacific.

Page 8, left column, 4th paragraph, 1st sentence, revised as follows:

On Hawai'i Island, internees were held temporarily at Kilauea Military Camp, Waiākea Prison Camp near ~~at~~ the Hilo Airport, and the Hilo Independent Japanese Language School.

Page 8, right column, 3rd paragraph, after 3rd sentence, revised as follows:

In 1942, family members of interned men were given the option to join them on the mainland. Many family members chose this voluntary incarceration because they didn't have any financial support without their head of household .

Page 9, left column, 2nd paragraph, revised as follows:

Honouliuli Internment Camp held approximately 400 internees. Of these, t~~T~~hree hundred sixty-four ~~twenty~~ were Nikkei ~~are known to have been interned at Honouliuli~~,including six women (JCCH, pers. comm. 2014 and ~~(~~Soga 2007, Appendix 4). Most of the Nikkei interned were American citizens of Japanese ancestry who had been educated in Japan, some of whom held dual citizenship (JCCH, pers. comm. 2014). In addition, 33 of the 36 remaining internees—described as being of "German" or "Italian" heritage—were American citizens, including seven women (Rosenfeld 2014).

Page 9, right column, 2nd paragraph, revised as follows:

The best estimate for the number of people of Japanese ancestry incarcerated from Hawai'i is approximately 2,456 ~~2,392 (Kashima 2003, 86)~~. This number included 875 predominantly Issei males arrested and transferred to Department of Justice internment camps on the mainland; 1,217 individuals of Japanese ancestry in Hawai'i sent to War Relocation Authority camps on the mainland; and approximately 364 ~~300~~ Nikkei imprisoned in Hawai'i (JCCH 2014 and Kashima 2003, 86).

Page 10, left column, 1st paragraph, revised as follows:

In addition, there were 139 Caucasian internees from Hawai'i (Rosenfeld 2014). One hundred twenty-five of them were listed in an FBI memo at ~~lists 125 people of European ancestry incarcerated by~~ the end of March 1942, ~~including~~ which cited 67 German aliens, 40 U.S. citizens of German ancestry,

15 Italian aliens, two U.S. citizens of Italian ancestry, and one Norwegian alien (Shivers 1942). New research indicates that some internees reported to be "German" and "Italian" were of other nationalities or cultural affiliations. In summary, individuals who were interned in Hawai'i included people of Filipino, Okinawan, Japanese, German, Italian, Danish, Finnish, Irish, Lithuanian, Korean, Norwegian, and Swedish descent, as well as European Jews who had escaped persecution by the Nazis (Rosenfeld 2014).

Page 17, right column, 3rd paragraph, 1st sentence, revised as follows:

The U.S. Immigration Station building is currently used for offices of the Department of Homeland Security and the ~~Hawaiian~~ Hawai'i State Department of Health.

Page 20, left column, 1st paragraph, 1st sentence, revised as follows:

All of the buildings at the site were present during World War II: the administration building; a two-story detention building now used by the Hawai'i State Department of ~~Public~~ Health; a long, one-story annex; and the garage/waiting shed.

Page 23, right column, 2nd paragraph, 1st sentence, revised as follows:

Honouliuli is a longstanding place name, translated as "dark bay," that marks the areas between 'Ewa villages and Waipahu.

Page 24, right column, 2nd paragraph, 1st sentence, revised as follows:

Honouliuli was the largest prisoner of war camp in Hawai'i and held nearly 4,000 individuals during its operation~~, including 2,700 Korean POWs~~. The POW population was composed of soldiers and labor conscripts from Korea, Okinawa, Taiwan, Japan, and Italy. Honouliuli also held women and 10 children who were Japanese civilians displaced from the Pacific, including Saipan and Rota, as well as four men from the Philippines (Adler 2014 and Falgout 2014).

Page 28, left column, 2nd paragraph, 1st sentence, revised as follows:

On the island of Hawai'i, those arrested were sent to the Kilauea Military Camp (KMC), a military installation located within Hawai'i Volcanoes National Park, ~~Waikakea~~ Waiākea Prison Camp, and the Hilo Independent Japanese Language School.

Page 28, left column, 2nd paragraph, last sentence, revised as follows:

It is not known how many were temporarily detained and released. A few internees were held at the Waiākea Prison Camp, located near ~~at~~ the Hilo Airport.

Page 28, left column, 2nd paragraph, added after last sentence:

Participants at the Hilo public meeting on June 4, 2014 indicated that a place near the U.S. Post Office at the Hilo Airport was used by the Army National Guard and FBI for interrogation and detaining internees. It was suggested that it could have been a location where internees were first taken before being transferred to other internment locations. Additional research is needed to verify the location and confirm that it was used for internment during World War II,

Page 32, left column, 2nd paragraph, revised as follows:

Waiākea Prison Camp is no longer intact, though a former mess hall slab may still exist. The Waiākea Prison Camp was located in the vicinity of 1498 Kalanianaole Avenue and is currently owned by Kamehameha Schools and leased to the Edith Kanakaole Foundation for their use (Mossman, pers. comm. 2013). A complex of new structures exists at the site today. ~~The precise location of the Waiakea Prison Camp has not been determined. If a specific place or existing feature can be associated with the imprisonment of civilian internees, the site could be of local significance.~~

Page 35, right column, 3rd paragraph, revised as follows:

The location of Kalāheo Stockade has not yet been fully determined ~~beyond anecdotal agreement about its location at the current Medeiros Chicken Farm~~. Six possible locations were investigated during the 2006 archeological reconnaissance, and additional reconnaissance was attempted in 2014. No conclusive evidence of the stockade was found, but many members of the public believe it to be at or near ~~the most likely sites were determined to be~~ the Medeiros Chicken Farm. A 1943 military map places the stockade in the Medeiros Chicken Farm vicinity, but to the east. Additional research would be needed to confirm the precise location of the Kalāheo Stockade and condition of any remaining resources.~~, a site along the Alexander Reservoir Road, and Kalaheo School~~. ~~The Medeiros Chicken Farm was identified as the correct location by attendees at the Kaua'i public scoping sessions, and there are reports that a map of hte camp exists (Schlang, pers. comm. 2011).~~

Page 36, right column, 2nd paragraph, 1st sentence, revised as follows:

The two known internment sites on Maui are the Maui County Jail—called the "Detention Camp" in Wailuku, which was located at the site of the current Maui County Correction Center,~~in the center of the island's main government and office district,~~ ~~-~~—and the Ha'ikū Military Camp in the town of Ha'ikū.

Page 37, revised as follows:

Photos (clockwise from top left): 1. The Old Police Station in Wailuku may have been used to detain internees temporarily ~~stood adjacent to the Maui County Jail (since demolished), where internees were temporarily detained~~. Photo by Rick Regan: provided as part of National Register nomination form, 1981. 2. The Old Wailuku Courthouse, ~~(~~seen here in 2006) ~~stood adjacent to the Maui County Jail~~. Photo: Burton and Farrell 2007. The significance of the Police Station and the Courthouse to WWII internment requires further investigation. 3. Historic cannery building, Ha'ikū. Photo: Burton and Farrell 2007. 4. Roots School ~~Horizons Academy~~, possible United Service Organizations (USO) site of Ha'ikū Camp during WWII. Photo: NPS, 2011.

Page 38, left column, 2nd and 3rd paragraphs, revised as follows:

Maui County Jail

Records indicate that the Maui County Jail, also called the Wailuku County Jail, was used to detain individuals of Japanese descent. A letter from an internee, dated June 3, 1942, identified the return address as "Detention Camp, Wailuku." The original jail building was constructed in 1941 as the county's jail facility, and then was used during World War II as a location to detain internees. It was located at the site of the current Maui County Correctional Center at 600 Waiale Road in Wailuku. ~~This building has been demolished, however two buildings adjacent to the Maui County Jail may also have held internees.~~ Additional research is necessary to determine if ~~and how these two buildings—~~ the Old Wailuku Courthouse and the Old Police Station, now called the Kalana Pakui Building~~, or Old Police Station~~—were used during internment.

Physical Remains

The Maui County Jail structure was demolished in 1970. The Old Police Station (built in 1928) and the Old Wailuku Courthouse (built in 1907) are part of the Wailuku Civic Center Historic District. The district was listed in the National Register of HIstoric Places in 1986.~~, which also includes a non-contributing modern structure built on the site of the former jail.~~

Page 38, right column, 2nd paragraph, revised as follows:

Lindsay went to visit the Ha'ikū Camp during World War II. His personal recollection is that the existing Roots School ~~Horizons Academy~~ building located at 740 Ha'ikū Road may have been part of the old Ha'ikū Pineapple Company and later used for the internment camp (Lindsay, pers. comm. 2010).

Additional research completed by David Fukuda of the Nisei Veterans Memorial Center confirms the location of the Haʻikū Camp in the area north and east of the existing Haʻikū Post Office. Fukuda interviewed Ty Kakihara, born in 1927, who remembered the area during World War II. He remembered the former dorm for cannery workers was enclosed with a wire fence and guard towers.

CHAPTER 3: RESOURCE SIGNIFICANCE

Page 41, left column, 2nd paragraph, 1st sentence, revised as follows:

According to 36 CFR 65.4 – National Historic Landmark (See Appendix ~~D~~ C), the quality of national significance is ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association, and:

Page 42, caption, revised as follows:

Barracks and tents at Honouliuli, with the women's internee compound in the background. A portion of the rock wall visible ~~in the background~~ behind still stands on the site today. Photo by R. H. Lodge, c. 1945, courtesy Hawaiʻi's Plantation Village.

Page 51, right column, 3rd paragraph, 1st sentence, revised as follows:

Creating social institutions and movements: The NPS notes that "Americans generate temporary movements and create enduring institutions in order to define, sustain, or reform their values" (NPS 1996, 8) and this theme is illustrated by the internment sites.

Page 52, right column, 4th paragraph, 1st sentence, after 3rd sentence revised as follows:

The U.S. Immigration Station's recent change in administration illustrates the *changing role of the United States in the world community*: the 70-year-old United States Immigration and Naturalization Service was dismantled by the Homeland Security Act of 2002 and separated into the U.S. Immigration and Customs Enforcement, U.S. Customs and Border Protection, and the U.S. Citizenship and Immigration Services, all within the Department of Homeland Security. ~~became part of the Department of Homeland Security in 2003.~~

Page 54, left column, 5th paragraph, last sentence, revised as follows:

~~Exhibits along the sidewalk and other outside areas could provide the public with information about the story of the internment, as well as the history of immigration in Hawaiʻi and the architecture of the buildings.~~

Page 62, left column, last paragraph, 1st sentence, revised as follows:

The Honolulu Police Department, Yokohama Specie Bank, and Kauaʻi County Courthouse~~, and Maui County Courthouse and Police Station~~ are three ~~five~~ sites associated with internment that are already listed in the National Register of Historic Places and retain high integrity.

Page 62, right column, 1st paragraph, last sentence revised as follows:

Together, these ~~seven~~ five sites possess opportunities to tell multiple aspects of the story of the forcible internment of civilians during World War II.

Page 62, right column, 2nd paragraph, revised as follows:

~~Five of the sites (Waiakea Prison Camp and the Hilo Independent Japanese Language School on the Big Island, Lihue Plantation Gymnasium and Kalaheo Stockade on Kauaʻi, and Haiku Military Camp on Maui) associated with the World War II internment of civilians need additional research to determine whether they retain sufficient integrity of location, setting, materials, workmanship, design, feeling, and association to be of national or state significance.~~

Page 62, right column, 3rd paragraph, revised as follows:

Association with internment enhances the significance of three ~~five~~ buildings already listed in the National Register of Historic Places: Honolulu Police Department, Yokohama Specie Bank, and Kaua‘i County Courthouse~~, and Maui County Courthouse and Police Station~~.

Page 63, left column, 3rd paragraph, 1st sentence, revised as follows:

In six ~~five~~ cases, additional research is necessary to establish clear association with internment, or to determine whether the property retains sufficient integrity to convey its significance: Waiākea Prison Camp and the Hilo Independent Japanese Language School on the island of Hawai‘i, Līhu'e Plantation Gymnasium and Kalāheo Stockade on Kaua‘i, and Ha‘ikū Military Camp and Maui County Courthouse and Police Station on Maui.

Page 63, left column, 4th paragraph, 1st sentence, revised as follows:

Six~~Four~~ of the sites associated with the World War II internment of civilians appear to lack sufficient integrity for National Register consideration: Sand Island Detention Camp on O‘ahu, Wailua Jail and Waimea Jail on Kaua‘i, Maui County Jail on Maui, Waiākea Prison Camp on the island of Hawai‘i, and Kaunakakai Jail and Courthouse on Moloka‘i. Structures related to World War II internment have been removed from the Sand Island, Wailua, ~~and~~ Waimea, Waiākea,~~sites~~ and Maui County Jail sites, and because of modern disturbance there is little potential for significant archeological deposits at those sites.

Page 65, Sites Listed in the National Register of Historic Places, where Internment History Enhances or May Enhance Their Significance, bottom row, revised as follows:

~~Maui County Jail, Courthouse, and Police Station~~	~~150 and 200 South High Street, Wailuku, Maui~~	~~Jail has been demolished but Courthouse and Police Station have high integrity.~~	~~Internees were held at the Maui County Jail, which has since been demolished. However, the Courthouse and Police Station may be associated with the World War II internment. The courthouse and the police station were listed as part of the Wailuku Civic Center Historic District in the National Register of Historic Places in 1986 for architecture and for their association with the early development of Maui County. Their potential relationship to World War II internment could enhance the significance of both structures.~~

Page 66, Sites Needing Additional Research, top row, revised as follows:

Waiākea Prison Camp	Hilo, Island of Hawai’i	Unknown	As a hard-labor prison camp where internees considered “troublemakers” were sent, this site could have a high level of significance for its ability to convey the reach of martial law. However, its ~~location and~~ integrity needs to be determined.

Page 66, Sites Needing Additional Research, bottom row, revised as follows:

Maui County Courthouse and Police Station	150 and 200 South High Street, Wailuku, Maui	High	Further investigation is required to determine whether the Courthouse and Police Station were associated with the World War II internment. The Courthouse and the Police Station were listed as part of the Wailuku Civic Center Historic District in the National Register of Historic Places in 1986 for architecture and for their association with the early development of Maui County.

Page 67, Other Sites, bottom row, revised as follows:

Maui County Jail	600 Waiale Road, Wailuku, Maui	Lacks Integrity/ Demolished	The Maui County Jail, also called the Wailuku County Jail, was used to detain individuals of Japanese descent. It was called the "Detention Camp, Wailuku." The jail was demolished in 1970.

CHAPTER 4: SUITABILITY

Page 69, right column, 2nd paragraph, 2nd sentence, revised as follows:

In Chapter 3: Resource Significance, the section Significance of the Events: Incarceration of Civilians in the United States during World War II provides a complete description of the differences between the incarceration of civilians in Hawai'i and on the U.S. mainland.

Page 76, left column, 3rd paragraph, 1st sentence, revised as follows:

Appendix ~~C~~ D: Japanese American Wartime Incarceration Properties provides the names of properties, their locations, and status of federal and state designations of all known incarceration sites.

Page 81, left column, 1st paragraph, last sentence, revised as follows:

~~Despite these limitations, the U.S. Immigration Station's history could be interpreted for the public through a variety of offsite media and outreach and limited onsite exhibits and waysides.~~

Page 81, right column, 1st paragraph, 2nd sentence, revised as follows:

- Creating Social Institutions and Movements

Page 89, left column, 2nd paragraph, 1st sentence, revised as follows:

~~National Historic Landmarks and National Register Districts that reflect the theme of the Changing Role of the United States in the World Community:~~

National Historic Landmarks and National Register Districts that reflect the theme of the Changing Role of the United States in the World Community:

CHAPTER 5: FEASIBILITY AND THE NEED FOR NPS MANAGEMENT

Page 91, right column, 4th paragraph, 1st sentence, revised as follows:

Honouliuli Internment Camp is located approximately ~~20~~ 15 miles west of downtown Honolulu, ~~east~~ west of Kunia Road and north of Interstate H-1.

Page 91, right column, 4th paragraph, 2nd and 3rd sentences, revised as follows:

The historic site, defined by the boundary established by the National Register of Historic Places (122.5 acres), is located on portions of three separate parcels owned by the Monsanto Company, identified as Honolulu County tax map keys (TMKs) (1) 9-2-001-001 (~~Monsanto Parcels 1 and 1a~~ Lots 16851-A and 16851-B) and(1) 9-2-004-009 (~~Monsanto Parcel 2~~ Lot 12007). Parcel ~~1~~ (1) 9-2-001-001 is approximately 1,830 acres. The Monsanto Company has recently subdivided 116 acres of this parcel (~~Parcel 1A~~ Lot 16851-B), which contains most of the historic camp features. ~~Parcel 2~~ Lot 12007 is 437 acres, nine of which include historic camp features.

Page 93, left column, 3rd paragraph, 4th sentence, revised as follows:

Parcels include TMK (1) ~~92001008~~ 9-2-001-008 (0.4 acres), TMK (1) ~~92001009~~ 9-2-001-009 (0.1 acres), and TMK (1) ~~920010010~~ 9-2-001-0010 (0.1 acres).

Page 93, left column, 3rd paragraph, 7th sentence, revised as follows:

BWS holds access easements over Monsanto ~~Parcel 1~~ parcel TMK (1) 9-2-001-001.

Page 93, right column, 2nd paragraph, revised as follows:

Large satellite dishes owned by the KITV television station are located within a fenced enclosure in the southeastern area of the gulch on Monsanto ~~Parcel 1~~ parcel TMK (1) 9-2-001-009 (Integral Consulting, Inc. 2013).

Page 93, right column, 3rd paragraph, last sentence, revised as follows:

Currently zoned for agricultural uses, UHWO has identified these parcels for either ~~future campus expansion~~

Page 95, left column, 1st paragraph, 1st and 2nd sentences, revised as follows:

~~or~~ university or non-university related development~~, which could include educational, scientific, and research activities. UHWO will be conducting master planning for its campus lands west of Honouliuli to identify more specific future uses for the properties.~~ The University of Hawai‘i is currently working on a strategic land use plan that will determine the future use of its parcels adjacent to Honouliuli Internment Camp.

Page 95, left column, 4th paragraph, revised as follows:

In light of the interest in a potential unit of the national park system, the Monsanto Company has subdivided ~~Parcel 1~~ TMK (1) 9-2-001-001 and TMK (1) 9-2-001-009 ~~Parcel 2~~ to create three separate conservation easements that it could potentially transfer to the NPS. The Monsanto Company ~~is~~ also ~~creating~~ created a new standalone fee parcel (Lot 15861-B ~~Parcel 1A~~, 116 acres) over the historic site to transfer for conservation purposes. (See Map: ~~Honouliuli Internment Camp–Historic Resources and Conservation Easements~~ Land Ownership - Honouliuli Internment Camp). The Monsanto Company has also expressed a desire to transfer title to the 7-acre overlook site (~~Parcel 3~~ Lot 12011) to the National Park Service.

Page 95, left column, Last paragraph, before 1st sentence, additional text as follows:

Establishment of a national park unit that would include Honouliuli Internment Camp is consistent with state and local land use policies and guidance including, the *Hawai‘i State Plan*, the *City and County of Honolulu General Plan* and Revised Ordinances of 1990, and the *‘Ewa Development Plan* (Hawai‘i Department of Planning and Economic Development 1986, City and County of Honolulu 2002 and 2013).

Page 95, right column, 1st paragraph, after 1st sentence, additional text as follows:

Chapter 205 of Hawai'i Revised Statutes (§205-4.5 (a)(6)(8)). City and County of Honolulu local zoning allows for public uses and structures in zone AG-1 (Revised Ordinances of Honolulu 1990). The recently adopted *'Ewa Development Plan*, the City and County of Honolulu's long-range land use and infrastructure plan for the 'Ewa region, identifies Honouliuli Internment Camp as one of 'Ewa's significant historic features and landmarks and calls for its protection and preservation (See Maps: ~~Honouliuli Internment Camp-Zoning~~ Zoning - Honouliuli Internment Camp, State Land Use Districts, and *'Ewa Development Plan*, Urban Land Use Map).

Page 95, right column, 2nd paragraph, 2nd sentence, revised as follows:

As described in Chapter 3: Resource Significance, the U.S. Immigration Station was listed in the National Register of Historic Places in 1978.

Page 95, right column, 2nd paragraph, 3rd sentence, revised as follows:

The U.S. Immigration Station Complex site is 4.5 acres located on two separate parcels.

Page 95, right column, 2nd paragraph, 4th sentence, revised as follows:

The larger parcel (TMK 2-1-015-018) contains all but one of the four buildings associated with the complex and is currently occupied by the U.S. Department of Homeland Security's ~~Immigration and Naturalization Service,~~ Immigration and Customs Enforcement.

Page 95, right column, 3rd paragraph, last sentence, revised as follows:

This two-story building is currently occupied by the Hawai'i State Department of ~~Public~~ Health.

Page 96, map Historic Resources and Conservation Easements – Honouliuli Internment Camp, deleted from document. Pertinent information is included on map Land Ownership - Honouliuli Internment Camp.

Pages 97 and 100, additional maps provided, State Land Use Districts, and 'Ewa Development Plan, Urban Land Use Map.

Page 99, Map: Zoning—U.S. Immigration, revised as follows:

Street data has been updated to reflect current road and circulation patterns.

Page 100, left column, 2nd paragraph, 3rd sentence, revised as follows:

Monsanto has expressed its interest in donating portions of the property to the NPS for establishment of a national park unit (~~Parcels 1A and 3~~ Lot 16851-B and Lot 12011).

Page 100, left column, 3rd paragraph, revised as follows:

Existing use of the U.S. Immigration Station by the U.S. Department of Homeland Security and Hawai'i State Department of ~~Public~~ Health would not be compatible with use as a national park unit. However, if the U.S. Immigration Station facilities were no longer needed by the U.S. Department of Homeland Security or the Hawai'i State Department of Health, additional NPS analysis would be needed to determine the feasibility of management options and associated costs. Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration. ~~However, if at any time in the future the U.S. Department of Homeland Security no longer needed the facilities, zoning and ownership would not conflict with management of a national park unit.~~ The U.S. Immigration Station complex would not be feasible for direct NPS management and ownership as part of a national park unit at this time.

Page 104, Map: Access and Circulation Data—U.S. Immigration, revised as follows:

Street data has been updated to reflect current road and circulation patterns.

Page 105, left column, 1st paragraph, 2nd sentence, revised as follows:

Honolulu's Department of Transportation Services ~~buses~~ (lines 8 and 20) stop directly in front of the complex.

Page 105, left column, 1st paragraph, 3rd sentence, revised as follows:

However, current use of the building by the U.S. Department of Homeland Security and the ~~State of~~ Hawai'i State Department of ~~Public~~ Health does not allow for general public access (See Map: Access and Circulation–U.S. Immigration Station).

Page 105, left column, 2nd paragraph, 2nd sentence, revised as follows:

~~To provide for limited public information about the U.S. Immigration Station's history, waysides or other information materials could be provided along the sidewalk in front of the complex or at the bus stop located directly in front of the buildings on Ala Moana Boulevard.~~

Page 105, right column, 2nd paragraph, 2nd sentence, revised as follows:

~~However, given the building's prominent location in downtown Honolulu, interpretive features located in near the sidewalk and bus stop on Ala Moana Boulevard could provide information about this site's historical significance.~~

Page 106, left column, last paragraph, revised as follows:

In addition to the lands within the national register boundary, a suitable boundary would include ~~parcels owned by UHWO and the Monsanto Company that provide current road access and opportunities for visitor facilities such as parking, restrooms, and interpretive features. This includes~~ the 7-acre overlook site to the west, currently owned by Monsanto, and ~~UHWO parcels to the north (38 acres) and south (12 acres) of the overlook site~~ 22.5 acres of land owned by Monsanto surrounding the drainage to the south of the national register boundary. These lands may contain archeological artifacts related to the internment camp.

Portions of the large UHWO parcel ~~(285 acres)~~ west of the overlook site ~~w~~could also be included to provide for public access. These parcels are agricultural lands either actively farmed or fallow. The University of Hawai'i is currently completing a land use plan for its lands west of Honouliuli Internment Camp. If the university were to identify new road alignments as part of that planning process, which could be used to access Honouliuli Internment Camp, then a small boundary adjustment for this alignment could be considered to allow NPS to expend funds on road maintenance. ~~Although the primary purpose of including UHWO lands to the west would be for public access, the NPS could also seek to work with the UHWO to pursue conservation easements on some portion of these lands.~~ The NPS would not need to directly own or manage UHWO lands to achieve these purposes.

Page 106, right column, last paragraph, 3rd sentence, revised as follows:

For Honouliuli Internment Camp, there is sufficient land available for appropriate use and development of the site ~~on parcels that lie to the west~~.

Page 113, right column, 1st paragraph, 2nd sentence, revised as follows:

An appropriate boundary configuration would include the historic camp area and ~~lands sufficient to provide site~~ would allow for access and ~~public staging~~ visitor facilities such as parking.

Page 113, right column, 2nd paragraph, 1st sentence, revised as follows:

The U.S. Immigration Station complex is not feasible as a national park unit because of existing uses by the U.S. Department of Homeland Security and the ~~State of~~ Hawai'i State Department of ~~Public~~ Health.However, if the U.S. Immigration Station facilities were no longer needed by the U.S. Department of Homeland Security or the Hawai'i State Department of Health, additional NPS analysis would be needed to determine the feasibility of management options and associated costs. Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration.~~However, if at any time in the future the U.S. Department of Homeland Security no longer needed the facilities, zoning and ownership would not conflict with management of a national park unit.~~ The public enjoyment potential of the facilities is high given its accessible and prominent location in downtown Honolulu.~~ If the facilities were no longer needed by federal or state agencies, additional analysis would be needed to determine the feasibility of management options and associated costs.~~

Page 114, right column, 1st row, 1st paragraph, 2nd sentence, revised as follows:

Existing use of the U.S. Immigration Station complex by the U.S. Department of Homeland Security and ~~State of~~ Hawai'i State Department of ~~Public~~ Health make it incompatible with NPS management as part of a national park unit.If the U.S. Immigration Station buildings were no longer used by the U.S. Department of Homeland Security or the Hawai'i State Department of Health, additional NPS analysis would be needed to determine the feasibility of management options and associated costs. Given the size and scale of the facilities, costs for maintenance and preservation of the historic structures would be a primary consideration.~~, and were to become available to the NPS, management as a national park unit would be compatible with current zoning and ownership patterns.~~

Page 114, right column, 2nd row, 1st paragraph, 4th sentence, revised as follows:

~~However, given the site's prominent location in downtown Honolulu, interpretive features located in publicly accessible areas could provide information about its historical significance.~~

CHAPTER 6: ALTERNATIVES

Page 117, left column, 2nd paragraph, 1st sentence, revised as follows:

The study team developed two alternatives for the draft study report/environmental assessment (EA), based on information gathered from public and stakeholder input, internal NPS discussions, evaluation of special resource study criteria, historical research, and NPS management models.

Page 117, left column, additional text to follow 3rd paragraph:

The Selected Alternative

National Historic Site or National Monument—A New Unit of the National Park System

The recommendations encompassed in the selected alternative are the same as those identified and analyzed in alternative B in the draft study report/EA, with the exception of modifications made as a result of information and comments derived from public review of the draft study report/EA, as follows:

- The proposed national historic site or monument boundary has been reduced at the request of the University of Hawai'i. Discussions between the NPS and the University of Hawai'i have identified approaches to public access that do not require inclusion of University of Hawai'i land in an NPS boundary at this time. The University of Hawai'i is committed to working with the NPS on granting access to the site over university lands should a national park unit be established. Future road access could be added to the national historic site or monument boundary once a more permanent road alignment has been determined.

- Minor modifications have also been made to address concerns regarding universal access to the site, potential partnerships, and technical assistance opportunities.

The above modifications would not constitute a change in environmental impacts beyond what was analyzed in the environmental assessment.

Page 118, left column, before 3rd paragraph, insert additional paragraph:

Local organizations and institutions have been active in documentation, preservation, and interpretation efforts for Honouliuli Internment Camp. The Japanese Cultural Center of Hawai‘i (JCCH) has conducted extensive research and uncovered the location of Honouliuli Internment Camp and other related sites. The JCCH maintains the largest repository of archives and collection items related to Honouliuli and the internment history in Hawai‘i. University of Hawai‘i—West O‘ahu faculty and students have also played a significant role in researching the history of Honouliuli and conducting archeological surveys. In 2012, the Hawai‘i State Legislature commissioned an advisory group, called the Honouliuli Park Site Advisory Committee, to support preservation of the Honouliuli site. The advisory group was directed to: 1) provide state support toward preservation of the Honouliuli site; 2) establish a mechanism to leverage county, state, federal, and private funding for an educational resource center at the site; and 3) memorialize the struggle for civil rights by Hawai‘i’s people.

Page 120, left column, 4th paragraph, 2nd sentence, revised as follows:

Public Law ~~a~~109-441 (16 USC 461) established the JACS Grant Program for the preservation and interpretation of U.S. confinement sites where Japanese Americans were incarcerated during World War II.

Page 120, right column, 1st paragraph, last sentence, revised as follows:

Since its establishment in 2006, ~~T~~the JACS Grant Program has awarded more than $15 ~~approximately $12.4~~ million ~~dollars~~ in grants as of fiscal year 2014~~2013~~.

Page 120, right column, 2nd paragraph, before last sentence, insert:

California-based CyArk received a grant of $39,020 to digitally document Honouliuli.

Page 120, right column, 2nd paragraph, last sentence, revised as follows:

Under the no action alternative, organizations would continue to apply for JACS ~~JACs~~ grants for the life of the program.

Page 121, Table 6-1: Existing Management of Sites Evaluated in the Study, Nationally Significant Sites, 3rd column, 2nd row, revised as follows:

Hawai‘i State Department of ~~Public~~ Health

Page 121, Table 6-1: Existing Management of Sites Evaluated in the Study, Sites Listed or Potentially Eligible for Listing in the National Register of Historic Places, insert before first row:

Honolulu Police Department	Secondary, O‘ahu	Public, City and County of Honolulu	None

Page 121, Table 6-1: Existing Management of Sites Evaluated in the Study, Sites Listed or Potentially Eligible for Listing in the National Register of Historic Places, 3rd row, revised as follows:

~~Maui County Jail, Courthouse, and Police Station~~	~~Primary, Maui~~	~~Public, Maui County~~	~~None~~

Page 121, Table 6-1: Existing Management of Sites Evaluated in the Study, Potentially Significant Sites—Additional Research Needed, 1st row, revised as follows:

Waiākea Prison Camp	Secondary, Island of Hawai'i	Private ~~Exact Location Unknown~~	None

Page 121, Table 6-1: Existing Management of Sites Evaluated in the Study, Potentially Significant Sites—Additional Research Needed, insert row:

Maui County Courthouse and Police Station	Secondary, Maui	Public, Maui County	None

Page 121, Table 6-1: Existing Management of Sites Evaluated in the Study, Other Related Sites—No Integrity Remaining, revised as follows:

Sand Island Detention Camp	Primary, O'ahu	Public, State of Hawai'i	None/Non-Extant
Wailua Jail	Primary, Kaua'i	Public	None/Non-Extant
Waimea Jail	Primary, Kaua'i	Public	None/Non-Extant
Kaunakakai Jail and Courthouse	Secondary, Moloka'i	Public	None/Non-Extant
Maui County Jail	Primary, Maui	Public, Maui County	None/Non-Extant

Page 122, left column, heading, revised as follows:

Alternative B (Selected Alternative): Honouliuli National Historic Site or National Monument—A New Unit of the National Park System

Page 122, left column, 1st paragraph, 3rd sentence, revised as follows:

The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that ~~provide road~~ would allow for access and ~~opportunities for~~ visitor facilities.

Page 122, left column, 1st paragraph, 4th sentence, revised as follows:

In collaboration with partners, the National Park Service would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai'i during World War II.

Page 122, left column, 1st paragraph, 5th sentence, revised as follows:

The National Park Service could respond to requests to provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai'i during World War II.

Page 122, right column, Proposed Area, revised as follows:

The Honouliuli National Historic Site or National Monument would total approximately ~~440~~ 155 acres. The historic Honouliuli Internment Camp and the adjacent overlook parcel (totaling approximately 123 acres) would be acquired by the NPS through a donation by the Monsanto Company. Additional Monsanto-owned lands (31.5 acres) with related resources ~~would~~ could be protected through conservation easements ~~or land acquisition~~, land transfer, or other measures, at Monsanto's discretion. ~~Adjacent parcels (285 acres) owned by the University of Hawai'i would also be included in the boundary of the historic site to provide flexibility inestablishing public access to the site (NPS can only expend funds on roads within an authorized boundary unless Congressional legislation authorizes the use of funding for road maintenance on non-federally owned lands). Options for the University of Hawai'i parcels could include the University of Hawai'i maintaining ownership of the property, granting an easement to the NPS, or transferring ownership to the NPS by donation, exchange, or sale. Conservation easements could also be obtained for parcels directly adjacent to Honouliuli Internment Camp. Future development of road Easement 6134 could also provide opportunities for site access.~~ All private property rights would be respected.

The University of Hawai'i has committed to providing the NPS with public access to Honouliuli, initially through granting the NPS a right of entry over existing roads from the west. The University of Hawai'i is currently undergoing planning efforts for its lands adjacent to Honouliuli. This process and subsequent planning by the NPS should a national park unit be established may identify a new road alignment for public access. Once a desired road alignment for public access has been determined, this road alignment could be included in the national historic site or national monument through a boundary adjustment. This would allow the National Park Service to expend funds on the development maintenance of the access road.

Three ~~Several~~ parcels owned by the City and County of Honolulu Board of Water Supply (totaling 0.6 acres) would be inholdings within the proposed area and would remain under current ownership and management. The communications ~~site~~ facilities, non-contributing features within the historic site, would not be included in the proposed boundary.

Page 122, right column, 3rd paragraph, 1st sentence, revised as follows:

The NPS would have direct management responsibility for the Honouliuli National Historic Site or National Monument including: 1) interpretation and education associated with the Honouliuli Internment Camp and its resources, including the development of interpretive media and programs; 2) preservation and resource management for the historic site; and 3) operational facilities and infrastructure such as roads, restrooms, and trails.

Page 123, Map: Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument, Table: Parcels Included in Proposed Boundary, after column 1, additional column added to reference lot numbers.

Page 123, Map: Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument, Table: Parcels Included in Proposed Boundary, Row 2, Column 3, revised as follows:

~~9~~22.5

Page 123, Map: Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument, Table: Parcels Included in Proposed Boundary, Row 7, Column 3, revised as follows:

~~22~~9

Page 123, Map: Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument, Table: Parcels Included in Proposed Boundary, after row 2, additional rows provided as follows:

92001008	5616-B	CCH Board of Water Supply (Inholding)	0.401
92001009	9211	CCH Board of Water Supply (Inholding)	0.1
92001010	9212	CCH Board of Water Supply (Inholding)	0.1

Page 123, Map: Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument, callout text for parcel 92004009 within the proposed NPS boundary, revised as follows:

Conservation Easement Monsanto - ~~22~~9 acres

Page 123, Map: Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument, callout text for parcel 92004001 within the proposed NPS boundary, revised as follows:

Conservation Easement Monsanto - 922.5 acres

Page 123, Map: Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument, callout text for Board of Water Supply Inholdings:

(0.6 acres)

Page 124, left column, 1st paragraph, revised as follows:

NPS staff would protect and preserve ~~the~~ resources ~~and setting of~~ related to Honouliuli Internment Camp. Management plans would guide appropriate historic preservation documentation and treatments. As described below, there are opportunities to partner with local institutions and organizations in the protection of resources. ~~The NPS would seek out partnership opportunities with existing organizations that have conducted research and documentation of the site. These include the Japanese Cultural Center of Hawai‘i, which maintains the largest repository of archives and collection items related to Honouliuli and the internment in Hawai‘i, and the University of Hawai‘i—West O‘ahu, whose faculty and students have been actively involved in researching the history of the site and conducting archeological field schools at Honouliuli.~~

Page 124, left column, 3rd paragraph, before 1st sentence, additional text as follows:

Other entities, specifically the University of Hawai‘i—West O‘ahu and the Japanese Cultural Center of Hawai‘i, have done significant work to document, preserve, and interpret the Honouliuli Internment Camp and the larger history of internment in Hawai‘i during World War II. The NPS would seek to maintain these partnerships for future management of the Honouliuli National Historic Site or Monument. In addition, t~~T~~he NPS would explore, develop, and maintain new partnerships for the preservation and interpretation of Honouliuli Internment Camp and related sites, features, and stories in Hawai‘i.

Page 124, right column, 1st paragraph, last sentence, revised as follows:

~~Possible partners include but are not limited to the University of Hawai‘i- West O‘ahu and the Japanese Cultural Center of Hawai‘i.~~

Page 124, right column, 2nd paragraph, 1st sentence, revised as follows:

World War II-era internment and incarceration sites in Hawai‘i other than Honouliuli Internment Camp would continue to be owned and managed by their respective public and private owners.

Page 124, right column, 2nd paragraph, 2nd sentence, revised as follows:

The associated sites illustrate the broad-reaching effects of internment on the six major islands in Hawai'i and are ~~essential~~ valuable in accurately interpreting this history.

Page 124, right column, 3rd paragraph, 1st sentence, revised as follows:

Upon request, the NPS could work cooperatively with associated site owners and managers to explore opportunities for interpretation and/ or preservation of the associated sites.

Page 124, right column, 3rd paragraph, 2nd sentence, revised as follows:

~~For example, the U.S. Immigration Station played a central role in the internment process. Almost every person interned passed through the U.S. Immigration Station either for initial detention, processing for transfer to internment camps on O'ahu and the mainland, or for hearings and trials. The NPS could contribute to further evaluation of the U.S. Immigration Station as a national historic landmark and explore opportunities to interpret its significance through waysides and exhibits.~~

Page 124, right column, 3rd paragraph, after 3rd sentence, additional text as follows:

Any request for technical assistance related to the associated sites would be voluntary on the part of the landowner.

Page 124, right column, 4th paragraph, 1st sentence, revised as follows:

Where appropriate, the NPS could also conduct research and respond to requests ~~provide~~ for assistance to related sites that have yet to be identified.

Page 124, right column, 5th paragraph, 1st sentence, revised as follows:

~~Management of~~ Honouliuli National Historic Site or Monument would be managed through World War II Valor in the Pacific National Monument at Pearl Harbor, given its close proximity and related history.

Page 125, right column, 1st paragraph, 1st complete sentence, revised as follows:

The 7-acre overlook site could serve as ~~an excellent location for~~ a visitor staging area with ample space to provide for parking, visitor drop-off, interpretive features, and restrooms.

Page 125, right column, 1st paragraph, insert after last sentence:

Implementation planning would also explore opportunities for persons of all abilities to access and experience Honouliuli Internment Camp.

Page 125, right column, 2nd paragraph, revised as follows:

Currently there is no public access to Honouliuli Internment Camp ~~does not currently exist because it is located on private property~~. Rights of access would be required to provide public access to the 7-acre overlook parcel and the historic site. Existing roads would require considerable improvement to accommodate visitor access. As noted above, the University of Hawai'i has committed to working with the National Park Service with regard to providing public access on existing and future roads through its lands.

Page 126, right column, 1st paragraph, revised as follows:

Specific costs would be reevaluated in subsequent, more detailed planning for the unit. Planning would consider facility and site design, detailed identification of resource protection needs, and changing visitor expectations. Actual costs to the NPS would vary depending on timing and implementation and contributions by partners and volunteers. It is assumed that ~~meeting~~ the long-range financial needs of Honouliuli National Historic Site or Monument would not just rely upon

federally appropriated funds. A variety of other public and private funding sources could be sought by the NPS to assist in implementation efforts. Other NPS units have successfully found partners to help with funding major projects, and some of the costs associated with actions in the alternatives may prove to be less expensive ~~when~~ if donated materials, labor, and other support can be secured ~~are forthcoming~~.

CHAPTER 7: ENVIRONMENTAL CONSEQUENCES

Page 130, Table 7-1: Impact Topics Analyzed, 1st row, revised as follows:

Land Use (including Prime and Unique Farmland)	*Management Policies* (NPS 2006) states: "…the Service will cooperate with federal agencies; tribal, state, and local governments; nonprofit organizations; and property owners to provide appropriate protection measures. Cooperation with these entities will also be pursued, and other available land protection tools will be employed when threats to resources originate outside boundaries." Because the alternatives may affect land use, including ownership, occupancy and activities,land use has been retained as an impact topic. The Farmland Protection Policy Act of 1981, as amended, requires federal agencies to consider adverse effects to prime and unique farmland that would result in the conversion of these lands to non-agricultural uses. Prime or unique farmland is classified by the USDA, Natural Resources Conservation Service and is defined as soil that particularly produces general crops such as common foods, forage, fiber, and oil seed; unique farmland produces specialty crops such as fruits, vegetables, and nuts. Prime farmland is one of several kinds of important farmland defined by the USDA. It is of major importance in meeting the nation's short- and long-range needs for food and fiber. Because the supply of high-quality farmland is limited, the USDA recognizes that responsible levels of government, as well as individuals, should encourage and facilitate the wise use of our nation's prime farmland. ALISH (Agricultural Lands of Importance to the State of Hawai'i) is a Hawai'i state classification system that identifies agriculturally important lands and is intended to provide decision makers with a tool for use in agricultural preservation, planning, and development.The criteria for classification of prime agricultural land are identical to the criteria established by Soil Conservation Service, U.S.Department of Agriculture for national application. The criteria for unique agricultural and other important agricultural lands were established cooperatively by the Soil Conservation Service in Hawai'i, the College of Tropical Agriculture, and the State Department of Agriculture. Based on planning maps available through the State of Hawai'i Office of Planning website, areas immediately adjacent to Honouliuli Gulch are considered prime ~~and Unique~~ farmland~~s~~. The potential for an introduction of visitors to an area surrounded by ALISH lands may present an impact to agricultural operations, therefore this topic has been retained.

Page 130, Table 7-1: Impact Topics Analyzed, 3rd row, revised as follows:

~~Prime and Unique Farmlands (Agricultural Lands of Importance to the State of Hawai'i [ALISH])~~	~~Prime and Unique Farmlands (Agricultural Lands of Importance to the State of Hawai'i [ALISH]) The Farmland Protection Policy Act of 1981, as amended, requires federal agencies to consider adverse effects to prime and unique farmlands that would result in the conversion of these lands to non-agricultural uses. Prime or unique farmland is classified by the USDA, Natural Resources Conservation Service and is defined as soil that particularly produces general crops such as common foods, forage, fiber, and oil seed; unique farmland produces specialty crops such as fruits, vegetables, and nuts. Prime farmland is one of several kinds of important farmland defined by the USDA. It is of major importance in meeting the nation's short- and long-range needs for food and fiber. Because the supply of high-quality farmland is limited, the USDA recognizes that responsible levels of government, as well as individuals, should encourage and facilitate the wise use of our nation's prime farmland.~~ ~~ALISH (Agricultural Lands of Importance to the State of Hawai'i) is a Hawai'i state classification system that identifies agriculturally important lands and is intended to provide decision makers with a tool for use in agricultural preservation, planning and development. Based on planning maps available through the state of Hawai'i Office of Planning website, the area immediately adjacent Honouliuli Gulch is considered Prime and Unique Farmlands.~~ ~~The potential for an introduction of visitors to an area surrounded by ALISH lands may present an impact to agricultural operations, therefore this topic has been retained.~~

Page 131, Table 7-1: Impact Topics Analyzed, Discussion and Rationale column, 2nd paragraph, 1st sentence, revised as follows:

Compliance with the ~~ARPA~~ Archeological Resources Protection Act in protecting known or undiscovered archeological resources is necessary.

Page 138, left column, insert after 3rd paragraph:

Prime and Unique Farmland

Based on the ALISH (Agricultural Lands of Importance to the State of Hawai'i) classification system, most areas within the historic internment camp, as defined by the National Register of Historic Places, are not considered prime or unique farmland. Only two small areas, one in the far north of the historic site, and one in the far east near the current entry road, are classified as prime farmland. No lands are classified as unique farmland. These two areas are owned by the Monsanto Company, but are currently fallow. Areas to the west of the historic site owned by the University of Hawai'i, and the 7-acre overlook parcel owned by the Monsanto Company, are classified as prime farmland. The 7-acre site is currently fallow. However, most of the UHWO lands are under cultivation (see Map: Prime and Unique Farmland). The University of Hawai'i is currently working on a strategic land use plan that will determine the future use of these agricultural lands which could include either university or non-university related land uses.

Page 138, right column, 1st paragraph, last sentence, additional text to follow:

Direct effects to prime farmland adjacent to Honouliuli Internment Camp would be dependent on future use of the land as determined by the University of Hawai'i in its strategic land planning process. Occasional use of Honouliuli Gulch for interpretive tours and research as permitted by the current landowner would have no direct effects on prime farmland.

Page 138, right column, 2nd paragraph, last sentence, revised as follows:

Pending continued protection of sites designated or eligible as NHLs or listed in the National Register of Historic Places (NRHP), effects would remain moderate.

Page 138, right column, 3rd paragraph, 3rd sentence, revised as follows:

Possible changes to zoning could occur through Ceity and Ceounty of Honolulu (and adjacent landowner) land use plans to reflect the historic preservation of Honouliuli Gulch and visitor uses.

Page 139, left column, 2nd paragraph, last sentence, additional text to follow:

Direct effects to prime farmland could result from road improvements required for visitor access. The extent of such effects would need to be reassessed should the University of Hawai‘i's strategic land planning process identify future activities and uses other than agriculture for these parcels.

Page 139, left column, 3rd paragraph, 2nd sentence, revised as follows:

Likely support for visitor facilities would be in the vicinity of the UHWO ~~University of Hawai‘i – West O‘ahu~~ campus to take advantage of existing development plans and more easily manage access methods (i.e., shuttle buses).

Page 139, left column, 5th paragraph, 1st sentence, revised as follows:

Under alternatives A and B, there could be cumulative impacts on land use resulting from the campus development on the UHWO ~~University of Hawai‘i – West O‘ahu~~ lands to the west of Honouliuli Gulch and construction of the Honolulu rail line.

Page 139, right column, 3rd paragraph, 1st sentence, revised as follows:

Alternative A would have no direct effects on land use, but lack of a specific preservation direction for Honouliuli Gulch could result in incremental changes to use of the agricultural lands surrounding the gulch, resulting in long-term moderate to major adverse impacts to the Honouliuli ~~Gulch~~ Internment Camp.

Page 139, right column, 4th paragraph, 2nd sentence, revised as follows:

With a reliance on ‘offsite’ visitor contact infrastructure (in the vicinity of ~~the~~ UHWO ~~University of Hawai‘i – West O‘ahu~~), and utilization of existing roads, visitor impacts to existing agricultural operations surrounding Honouliuli Gulch would be limited.

Page 139, right column, 4th paragraph, 3rd sentence, revised as follows:

Impacts to ~~the~~ UHWO's ~~University of Hawai‘i – West O‘ahu's~~ parcels in the immediate vicinity of Honouliuli Gulch area would need to be reassessed should the university's planning process identify an activity other than agriculture for these parcels.

Page 140, left column, 1st paragraph, 5th sentence, revised as follows:

At the northern end of the gulch, the U.S. Geological Survey (USGS) maintains a stream flow gauge ~~gage~~ (station number 16212480 Honouliuli Stream Tributary).

Page 140, left column, 4th paragraph, 1st sentence, revised as follows:

Although modifications could be made to accommodate visitor parking and walking trails through the gulch, the known water resources located at this site (i.e. ground water pumping station used to support existing Bureau of Water Supply operations, the ephemeral stream, the USGS Water Gauge ~~Gage~~) would not be adversely impacted.

Page 140, right column, 4th paragraph, 2nd sentence, revised as follows:

Limited data from the USGS water gauge ~~gage~~ shows that water flow in the ephemeral stream occurs in the form of flash floods with fast draw down periods.

Page 142, left column, 5th paragraph, 1st sentence, revised as follows:

Much of the Honouliuli Gulch area is overgrown with vegetation, most notably invasive species such as guinea ~~Guinea~~ grass (*Panicum maximum*) and haole koa (*Leucaena* sp.) with Chinese banyan trees (*Ficus microcarpa*) near the creek drainage that runs north to south through roughly the center of the gulch.

Page 142, right column, 1st paragraph, 1st sentence, revised as follows:

After discussion with the U.S. Fish and Wildlife Service, a determination was made that there were no listed species present in the vicinity of the Honouliuli Gulch, so the NPS decided to dismiss threatened and endangered ~~T&E~~ species from further consideration.

Page 144, right column, 2nd paragraph, last sentence, revised as follows:

Other sites that were found to be nationally significant and retain a high degree of integrity include the U.S. Immigration Station, currently listed in the National Register of Historic Places and Kilauea Military Camp, eligible to be listed in the National Register of Historic Places.

Page 147, right column, 2nd paragraph, 2nd sentence, revised as follows:

It is not clear whether other associated sites ~~(Maui County Jail and Courthouse, Lihue Courthouse, Honolulu Downtown Jail)~~ would continue to be preserved.

Page 148, left column, 3rd paragraph, 2nd sentence, revised as follows:

However, a range of documents, oral histories, art, and other objects is available to researchers at the Japanese Cultural Center of Hawai'i research center in Honolulu.

Page 152, left column, 1st paragraph, 2nd sentence, revised as follows:

West O'ahu is where the 'second city' ~~"second city"~~ of Kapolei is being promoted as an alternative governmental agency center away from the high-density Kakaako district near downtown Honolulu.

CHAPTER 8: CONSULTATION AND COORDINATION

Page 158, left column, 1st paragraph, 1st sentence, revised as follows:

Public comments ~~were universal~~ predominantly expressed ~~in~~ the desire to commemorate the internment experience in Hawai'i.

Page 159, left column, 2nd paragraph, last sentence, revised as follows:

To comply with NPS responsibilities for Section 106, at the time of release of the ~~this~~ draft study in May 2014, the NPS requested consultation by ~~will consult with~~ the State Historic Preservation Division to seek concurrence on 1) recognition of the special resource study undertaking, 2) the area of potential effect, 3) identification of historic properties within the Honouliuli Gulch area, and 4) finding of No Adverse Effect to historic properties. The State Historic Preservation Division concurred with these findings in a letter dated September 23, 2014.

Page 159, left column, 3rd paragraph, last sentence, revised as follows:

The U.S. Fish and Wildlife Service ~~is~~ was invited to comment on the draft study.

Page 159, right column, 4th row from the bottom, revised as follows:

Department of Land~~s~~ and Natural Resources

Page 159, right column, last row, revised as follows:

Department of Hawaiian Home Lands ~~Homelands~~

Page 160, new section to follow: "Public Review of Draft Study Report"

APPENDICES

Page 167, 1st row, revised as follows:

Appendix D: Japanese American Wartime Incarceration Properties~~, Summary of Known Recognition, July 2011~~

Page 170–171, last section of table ("Other Internment/Detention Facilities") reorganized to conform to alphabetical order. No changes in content made.

Page 171, 4th row, revised as follows:

Maui County ~~Jail,~~ Courthouse~~,~~ and Police Station	Maui County, HI	National Register 8-20-1988 (included in Wailuku Civic Center Historic District, not for Japanese American association)	None known
Maui County Jail	Maui County, HI	No Federal designation	None known

REFERENCES

Page 174, image reference for photo on page 42:

Barracks and tents at Honouliuli, with the women's internee compound in the background. A portion of the rock wall visible ~~in the background~~ behind still stands on the site today. Photo by R. H. Lodge, c. 1945, courtesy Hawai'i's Plantation Village.

Page 175, last paragraph, move "Selected Bibliography" to precede bibliography.

Page 176, before Allen, Gwenfread citation, revised as follows:

Adler, Susan Matoba

2014 "The Effect of Internment on Children and Families: Honouliuli and Manzanar." In *Breaking the Silence: Lessons of Democracy and Social Justice from the World War II Honouliuli Internment and POW Camp in Hawai'i*, edited by Suzanne Falgout and Linda Nishigaya, 217–236. Social Process in Hawai'i, Vol. 45. Honolulu, HI: University of Hawai'i Press.

Page 176, before Daws, Gavan citation, revised as follows:

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Page 176, before Faye, Christine, Michael Faye, and Roy Miyake citation, revised as follows:

Falgout, Suzanne

2014 "Honouliuli's POWs: Making Connections, Generating Changes." In *Breaking the Silence: Lessons of Democracy and Social Justice from the World War II Honouliuli Internment and POW Camp in Hawai'i*, edited by Suzanne Falgout and Linda Nishigaya, 109–147. Social Process in Hawai'i, Vol. 45. Honolulu, HI: University of Hawai'i Press.

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Page 177, before Helber Hastert and Fee Planners, Inc., revised as follows:

Hawai'i Department of Planning and Economic Development

1986 *The Hawai'i State Plan, Revised*. Prepared by Hawai'i State Plan Policy Council, Department of Planning and Economic Development. Honolulu, HI.

Page 177, before Kashima, Tetsuden, revised as follows:

Japanese Cultural Center of Hawai'i (JCCH)

2014 Personal communication, September 1, 2014.

Page 179, before Saiki, Patsy Sumie Saiki, revised as follows:

Alan Rosenfeld

2014 "Neither Aliens nor Enemies: The Hearings of 'German' and 'Italian' Internees in Wartime Hawai'i." In *Breaking the Silence: Lessons of Democracy and Social Justice from the World War II Honouliuli Internment and POW Camp in Hawai'i*, edited by Suzanne Falgout and Linda Nishigaya, 80-108. Social Process in Hawai'i, Vol. 45. Honolulu, HI: University of Hawai'i Press.

Page 179, Saiki, Patsy Sumie Saiki, revised as follows:

Saiki, Patsy Sumie ~~Saiki~~

Page 182, right column, 7th paragraph, revised as follows:

Jeff Burton

Cultural Resources Program Manager, Manzanar National Historic Site ~~Trans-Sierran Archaeology~~

REFERENCES

LIST OF HISTORICAL IMAGES

Page number	*Caption and Source*
Cover	Photo of the Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Courtesy of Hawai‘i’s Plantation Village, Waipahu, HI.
xiv	Images of the Sand Island Internment Camp during World War II. National Park Service, World War II Valor in the Pacific National Monument archives, Honolulu, HI.
Chapter 2 divider	Coast Guard Station at Sand Island, O‘ahu, November 1946. Courtesy of the Japanese Cultural Center of Hawai‘i, Honolulu, HI.
5	Japanese store, Honolulu, c. 1895–1910. Library of Congress, Prints & Photographs Division, Washington, DC: LC-DIG-det-4a20736.
6	Japanese emigrants on sisal plantation, Hawai‘i, c. 1910–1915. Library of Congress, George Grantham Bain Collection, Prints & Photographs Division, Washington, DC: LC-DIG-ggbain-13386.
7	Pearl Harbor Naval Base and the U.S.S. *Shaw* ablaze following the Japanese attack, December 7, 1941. Library of Congress, Prints & Photographs Division, Washington, DC: LC-USZ62-16555.
9	Drawing of the women’s internee compound at Honouliuli by Dan Toru Nishikawa, 1943. Courtesy of the Japanese Cultural Center of Hawai‘i, Honolulu, HI.
10	Civilian Exclusion Order demanding the removal of all persons of Japanese ancestry, San Francisco. Photograph by Dorothea Lange, April 11, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
10	In response to Civilian Exclusion Order No. 20, San Francisco residents of Japanese ancestry wait to register with the Civil Control Station. Photograph by Dorothea Lange, April 25, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
12	Families board a bus in Centerville, CA that will take them to a temporary detention camp known as an “assembly center.” Photograph by Dorothea Lange, May 9, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
12	A grandfather and grandchildren await transportation, Hayward, CA. Photograph by Dorothea Lange, May 8, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
12	Families arrive at the WRA center at Heart Mountain, WY, September 1943. Photograph by Bud Aoyama. Courtesy of the Bancroft Library, University of California, Berkeley.
12	Arrivals at the Salinas Assembly Center, California. Photograph by Clem

	Albers, March 31, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
20	Gate at Sand Island Internment Camp. Photographer unknown, c. 1942. U.S. Army Museum of Hawai‘i, Honolulu, HI.
20	Detainees at Sand Island Internment Camp lived in tents for six months until barracks were constructed. Photographer unknown, c. 1942. U.S. Army Museum of Hawai‘i, Honolulu, HI.
22	Portraits of internees by George Hoshida. Courtesy of the George Hoshida Collection. Gift of June Hoshida Honma, Sandra Hoshida, and Carole Hoshida Kanada. Japanese American National Museum, Los Angeles, CA.
25	View of tents in Compound # 4 for POWs at Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Courtesy of Hawai‘i’s Plantation Village, Waipahu, HI.
31	Kilauea Military Detention Camp. Drawing by George Hoshida, 1942. Courtesy of the George Hoshida Collection. Gift of June Hoshida Honma, Sandra Hoshida, and Carole Hoshida Kanada. Japanese American National Museum, Los Angeles, CA.
32	1932 aerial photograph of the landing field at Hilo Airport, near the Waiākea Prison Camp. Courtesy Hawai‘i Department of Transportation, Honolulu, HI.
35	Wailua County Jail, Kaua‘i, possibly with internee housing in the background. Photo taken by Lt. James Daniels during WWII. Courtesy of the Kaua‘i Museum Archives, Līhu‘e, HI.
Chapter 3 divider	A view into daily life at Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Courtesy of Hawai‘i’s Plantation Village, Waipahu, HI.
42	Barracks and tents at Honouliuli, with the women’s internee compound in the background. A portion of the rock wall visible behind still stands on the site today. Photo by R. H. Lodge, c. 1945, courtesy of Hawai‘i’s Plantation Village, Waipahu, HI.
44	Sketch of internees working on crafts at Honouliuli by Dan T. Nishikawa, April 29, 1943. Courtesy of the Japanese Cultural Center of Hawai‘i, Dan Toru Nishikawa Family Collection, Honolulu, HI.
49	The U.S. Immigration Station, Honolulu, as it appeared in 1938. Photo on display at the U.S. Immigration Station, Honolulu.
70	Japanese American heads of family and persons living alone wait outside the Civil Control Station, San Francisco, in response to Civilian Exclusion Order Number 20. Photograph by Dorothea Lange, April 25, 1942. National Archives and Records Administration, College Park, MD.
72	This photograph of Manzanar, taken by Ansel Adams in 1943, illustrates the exposed, remote conditions of the majority of mainland incarceration sites. Manzanar War Relocation Center Photographs, Library

of Congress, Prints & Photographs Division, Washington, DC: LC-DIG-ppprs-00284.

73 Tule Lake: internees contribute to a large-scale agricultural operation typical of mainland sites, c. 1942–43. Farm Security Administration/Office of War Information Collection, Library of Congress Prints & Photographs Division,Washington, DC: LC-DIG-fsac-1a35013.

73 Women pose outside a barber shop at Tule Lake, c. 1942–43. Farm Security Administration/Office of War Information Collection, Library of Congress Prints & Photographs Division, Washington, DC: LC-DIG-fsac-1a35014.

77 A 1940 photograph of Camp Tulelake, looking northeast, when the camp was being used by the Civilian Conservation Corps. National Archives and Records Administration, College Park, MD.

84 The church in the Aleutian village Kashega in 1938, photographed by Alan G. May during a Smithsonian Institution Archeological Expedition to the Aleutian Islands. Alan G. May papers, Archives and Special Collections, Consortium Library, University of Alaska Anchorage.

84 Unangan children forcibly removed from their homes and relocated to Southeast Alaska. Photo: George Dale, 1942. Courtesy Alaska State Library, Evelyn Butler and George Dale Collection, ASL-P306-1056.

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The NPS study team is based in the National Park Service's Pacific West Region. Study team members were responsible for public involvement and outreach, technical reviews, research, writing and analysis, development of the alternatives, environmental compliance, and production of the study report.

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The NPS study team asked for and received tremendous help from many people and organizations. They hosted public meetings, publicized the study and meetings, provided historic photos and other documentation, organized site visits and tours, and provided many ideas. We extend a warm *mahalo nui loa* to:

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Honouliuli Park Site Advisory Committee
Pua Aiu, Ronald Chung, Suzanne Falgout, Kiersten Faulkner, Carole Hayashino, Jacce Mikulanec, Duk Hee Murabayashi, Alan Takemoto, Angie Westfall

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

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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