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DEPARTMENT OF PARKS AND RECREATION
KA 'OIHANA MĀLAMA PĀKA A ME NĀ HANA HO'ONANEA
CITY AND COUNTY OF HONOLULU

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March 30, 2026

The Honorable Andria Tupola, Chair
and Members
Committee on Housing, Homelessness & Parks
Honolulu City Council
530 South King Street, Suite 202
Honolulu, Hawai'i 96813

Dear Chair Tupola and Councilmembers:

SUBJECT: Bill 31 (2026) Relating to Cultural Sites in Public Parks

The Department of Parks and Recreation (DPR) supports the intent of Bill 31 (2026), and acknowledges the value of its and the community's protection and perpetuation of the important cultural resources in City parks. While DPR agrees with the importance of establishing standards and procedures, DPR strongly recommends the Council, before adopting any final measure, work with DPR, the Oahu Historic Preservation Commission and the Mayor's Office on Cultural and the Arts (MOCA), to identify and provide amendments which lay out a clear and sustainable process for the stewardship and care of these important cultural resources located in City parks.

The initial version of Bill 31 (2026) raises questions which, if not addressed, will create confusion and misinterpretations between the City, the community, and community groups. For example:

- Section 4 of Bill 31 (2026) states that any person interested may submit an application to DPR to become a steward of an important cultural resource area and the DPR shall determine whether the interested person has the adequate knowledge and skill to carry out the responsibility. However, the Bill does not provide guidelines for DPR to make that determination, nor does the department have staff with that knowledge.

- The Bill does not provide guidance on whether more than one individual or group may be designated a steward of an important cultural resource area, or how to make a determination between competing individuals or groups.

DEPT. COM. 229(26) HHP

- The Bill does not address how the current City organizational structure will manage the growing inventory of cultural site designations and stewardship plans. Unlike State Parks, the City DPR structure does not contain staff with this expertise, nor does the current staffing of MOCA.

Finally, by creating a Cultural Resource Area Program, Bill 31 (2026), would result in DPR managing two programs related to sites of cultural significance, each with differing criteria for designation. This presents a valuable opportunity to review both the existing Cultural Sites and proposed Cutlural Resource Area programs, evaluate their respective roles, and determine whether they should remain separate or be integrated where appropriate.

Accordingly, DPR respectfully recommends deferral of Bill 31 (2026) and, for the time being, convene a working group with representatives from the City Council, DPR, MOCA, and the Oahu Historic Preservation Commission to consider the logistical and organizational issues that will arise in these matters, and provide clarifying amendments to ensure that the final version of the Bill will provide comprehensive and clear guidelines that may be sustainably implemented by the City.

Thank you for the opportunity to provide testimony on Bill 31 (2026).

Sincerely,

Laura H. Thielen
Director

APPROVED:

Michael D. Formby, Managing Director
Office of the Managing Director