UNIVERSITY of HAWAI'I HILO
Ke Kulanui o Hawai'i ma Hilo

Bonnie D. Irwin
Chancellor

University of Hawaii Board of Regents
received October 30, 2026 at 1:57 p.m.

October 29, 2026

MEMORANDUM

TO: Lauren Akitake
Chairperson, Board of Regents

Neil Abercrombie
Chair, Committee on Facilities and Long-Range Planning

VIA: Wendy Hensel
University of Hawai'i President

FROM: Bonnie Irwin Bonnie Irwin (Oct 30, 2026 13:04:42 HST)
Chancellor, University of Hawai'i Hilo

SUBJECT: Approval of Amendments to the Master Plan for the University of Hawai'i Maunakea Lands, E O I Na Leo (Listen to the Voices)

SPECIFIC ACTION REQUESTED

On behalf of the Center for Maunakea Stewardship **("CMS")**, we request that the Board of Regents **("BOR")** consider and adopt the proposed amendments to the Master Plan for the University of Hawai'i Maunakea Lands, E O I Na Leo (Listen to the Voices), Volume 1 **("Master Plan").**

Our request is consistent with the Report of the Permitted Interaction Group to Investigate the Status of the Transition of Maunakea Stewardship from UH to MKSOA approved by the BOR ("MIG IV") at its special meeting on February 5, 2026 ("Special Meeting") directing the administration to commence the process to amend the Master Plan for consistency with Act 255 (2022), as amended, to allow the re-use of already disturbed sites, as recommended by the Governor and Hawaii Congressional delegation and as set forth as a matter of policy by Act 255. The process and recommendation for amending the Master Plan are set forth below.

RECOMMENDED EFFECTIVE DATE

Upon approval.

PURPOSE

At the Special Meeting of the BOR held February 5, 2026, University of Hawai'i Administration **("UH")** was directed to amend the Master Plan to align with Act 255 which established the Maunakea Stewardship and Oversight Authority **("MKSOA")** and authorized MKSOA to establish a framework for astronomy-related development on Mauna Kea (see HRS 195H-6 (d).

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The recommendation to amend the Master Plan was included in the report of the MIGIV established by the BOR on August 21, 2025 to investigate the status of the transition of Maunakea stewardship from the University of Hawai'i to MKSOA. The MIGIV recommendation was summarized in their report to the BOR which was reviewed at the special meeting, linked here **BOR 020526**. This Board Action Memo **("BAM")** summarizes the background, process, and proposed amendments to the Master Plan that Administration has developed as directed by the BOR.

BACKGROUND

Act 255, originally adopted during the 2022 Legislative session, provides for the transfer of management of UH's managed lands on Maunakea from UH to MKSOA. The transition was originally to be completed by July 1, 2028. Act 255 also directed UH and MKSOA to serve as joint managers during the transition period while MKSOA completed development of their management plan and established their legal framework and operational structure and procedures.

Act 255 directed MKSOA to prioritize the reuse of decommissioned astronomy sites for future astronomy uses. The Master Plan, adopted by the BOR in 2022, committed UH to not reusing certain decommissioned astronomy sites for future astronomy uses:

Act 255 (§-6)	UH Maunakea Master Plan 2022
"(d) The authority shall be responsible for the establishment of a framework for astronomy-related development on Mauna Kea. The framework may include: *(2) Prioritizing the reuse of footprints of observatories that are scheduled for decommissioning, or have been decommissioned, as sites for facilities or improvements over the use of undeveloped lands for such purposes;"*	*"Five of the 14 astronomy sites that existed in 2020 will be ineligible for future astronomy facility use once the existing astronomy facilities on them have been decommissioned. They may be considered for non-astronomy uses consistent with this Master Plan's framework." (Section 4.1.2)*

Act 53, passed during the 2026 Legislative session, amends Act 255 in several key areas. Germane to this matter, the Legislature recognized that MKSOA required more time to complete their management plan, establish their legal framework, and implement their organizational plan, so the effective date of the transition of management of Maunakea **("Transition Date")** date was amended to December 1, 2029. Act 53 further clarified that ***"the existing plans and administrative rules under which Mauna Kea is currently governed shall continue in full force and effect until a superseding master plan, management plan, or administrative rules, or any portion thereof, adopted by the Mauna Kea stewardship and oversight authority, takes effect."*** The existing plans and administrative rules governing the management and uses at Maunakea are UH's plans and administrative rules, as approved by the BOR.

The purpose of these proposed amendments is to ensure the Master Plan is consistent with Act 255, especially given the extended Transition Date and the clarification that the UH plans remain in effect until MKSOA adopts its own planning documents.

E. OBJECTIVES

The Master Plan is but one of the governing documents **("Governing Documents")** which guide and direct UH's stewardship of those portions of the Maunakea lands under our management. Other

key documents include the Maunakea Comprehensive Management Plan **("CMP")**, Decommissioning Plan **("Decomm Plan")**, UH's Administrative Rules **("AR")** governing our Maunakea managed lands (HAR Ch. §20-26), as well as the restrictions, terms and conditions under applicable Conservation District Use Permits **("CDUP")** and Site Plan Approvals **("SPA")**, and Ch. 343 environmental reviews associated with specific projects **("EA/EIS")**. Collectively these plans, permits, and regulatory processes form the legal and regulatory framework governing UH's management. As drafted, the modifications to the Master Plan do not impact other existing and continuing UH commitments and obligations under the Governing Documents.

Given the potential implications of a change to one element of the Governing Documents on other elements, CMS identified the following key objectives at the start of this assignment:

1. Limit changes to the UH Master Plan only, not other governing documents.
2. Maintain UH's commitments to a post-2033 astronomy footprint of no more than nine observatories in the Maunakea Science Reserve **("MKSR")**.
3. Decommissioning commitment and process, including subplans, remain unchanged.
4. TMT CDUP conditions remain unchanged.
5. Clarify and communicate that MKSOA's eventual management plan may change site reuse availability and requirements.

PROCESS

As reviewed in the MIGIV report, Section 8 of the Master Plan specifies the process UH would follow if an amendment to the Master Plan is required: "If specific terms and procedures require an amendment of this Master Plan, proposed amendments would follow the Type B proposal review process (Section 6.6.2, Figure 6-7)...". Attachment A is a flow chart depicting the Type B review process CMS followed to develop the amendments.

Per the Type B proposal review process, Phase 1 of the amendment process requires an initial screening and assessment of the suitability of the project proposal, in this case whether the proposal to amend the Master Plan is appropriate for UH's Maunakea Managed lands. The Master Plan identifies the criteria to be used to evaluate a proposal in this initial screening and assessment phase. The Center for Maunakea Stewardship (CMS) conducted an initial screening utilizing the 2022 Master Plan criteria and found no inconsistencies with the criteria. In addition, since no new development or use is proposed, many project-specific criteria did not apply. Attachment B outlines the application of the criteria to this proposal to amend the Master Plan. In summary, CMS concludes that amending the Master Plan to align with Act 255 is consistent with the applicable criteria and that all other criteria do not apply. The three applicable criteria and our conclusions are listed below:

2022 Master Plan Consistency	**Project Consistency**
Compliance with applicable University policies, as amended, related to real property held by UH, such as RP 10.201.	Act 255, signed into law on July 7, 2022, by Governor David Ige, is inconsistent with portions of the 2022 Master Plan, which is University policy. The proposal would harmonize University policy and state statute. The proposal is not known to conflict with other University policies.

2022 Master Plan Consistency	Project Consistency
Consistency with the mission, vision, goals, and objectives of the 2022 Master Plan.	It is consistent, it does not result in a modification to the mission, vision, goals, or objectives. Astronomy uses proposed in the Mauna Kea Science Reserve will continue to be reviewed and conditioned in a manner that addresses the mission, vision, goals, and objectives of the plan.
Consistency with the terms and conditions of CDUPs that have been issued that are relevant to the proposal.	The revision is consistent with all permit terms and conditions, except CDUP-3568 special condition 10. It is unknown if CDUP-3568 will be exercised. There are three scenarios: 1) Should TIO proceed with developing the Thirty Meter Telescope on Astronomy Site 13, then CDUP-3568, including Special Condition 10, will continue to be complied with, and three astronomy sites permanently removed from consideration for new astronomy uses. 2) TIO does not develop the Thirty Meter Telescope on Astronomy Site 13 and CDUP-3568, including Special Condition 10, becomes moot. 3) If (a) TIO desires to use another astronomy site or (b) a different use is proposed on Astronomy Site 13, then CDUP-3568, including Special Condition 10, becomes moot and a new land use application, HRS Chapter 343 review, and land disposition will be required.

The Type B proposal review process also calls for consultation with CMS's advisory groups including our Environment Committee (EC), Kahu Kū Mauna (KKM), and the Maunakea Management Board (MKMB). Further, as joint managers CMS and MKSOA have mutually agreed that all Type B and C projects proposed during the transition period would also be reviewed by MKSOA management and Board. In addition, CMS also consulted with the Maunakea Observatory Directors (MKO) given the implications of the proposed amendments for future astronomy operations on Maunakea. Below is the schedule of the consultations CMS conducted:

1. Environment Committee – August 13, 2026
2. Kahu Ku Mauna – August 27, 2026; Note: a second consultation was scheduled for October 1, 2026 but the meeting was canceled due to post-storm scheduling disruptions.
3. MKMB – September 8, 2026; October 6, 2026
4. MKSOA – September 10, 2026; October 8, 2026
5. MKO – September 24, 2026

Note that both MKMB and MKSOA Board meetings hold noticed, public meetings providing the opportunity for community input.

A key component of the consultation process was providing the ability for our advisory groups and the public to directly comment on the proposed amendments through Konveio, an online platform that allows users to provide anonymous comments and edits to specific sections and language being proposed in the amendments. CMS previously used this tool to gather public feedback on the 2022 Master Plan and found it useful to collect and incorporate public comment into that draft plan. The comment period for these amendments was publicized through media releases and UH News and was open from September 9, 2026 through October 14, 2026. There were a total of 1672 views of the amendments during the comment period and we received a total of 39 comments from 11 individuals. Attachment C is a listing of the comments received categorized by type and an AI summary of the comments generated by the Konveio tool. The comments tended to either recommend where clarification and additional action may be needed, ask a question, or offer an opinion on the need, reasons, or necessity of the amendments. CMS reviewed the comments carefully and made revisions especially where specific recommendations for clarification were provided. Figure 1 provides a snapshot overview of the feedback received through Konveio:

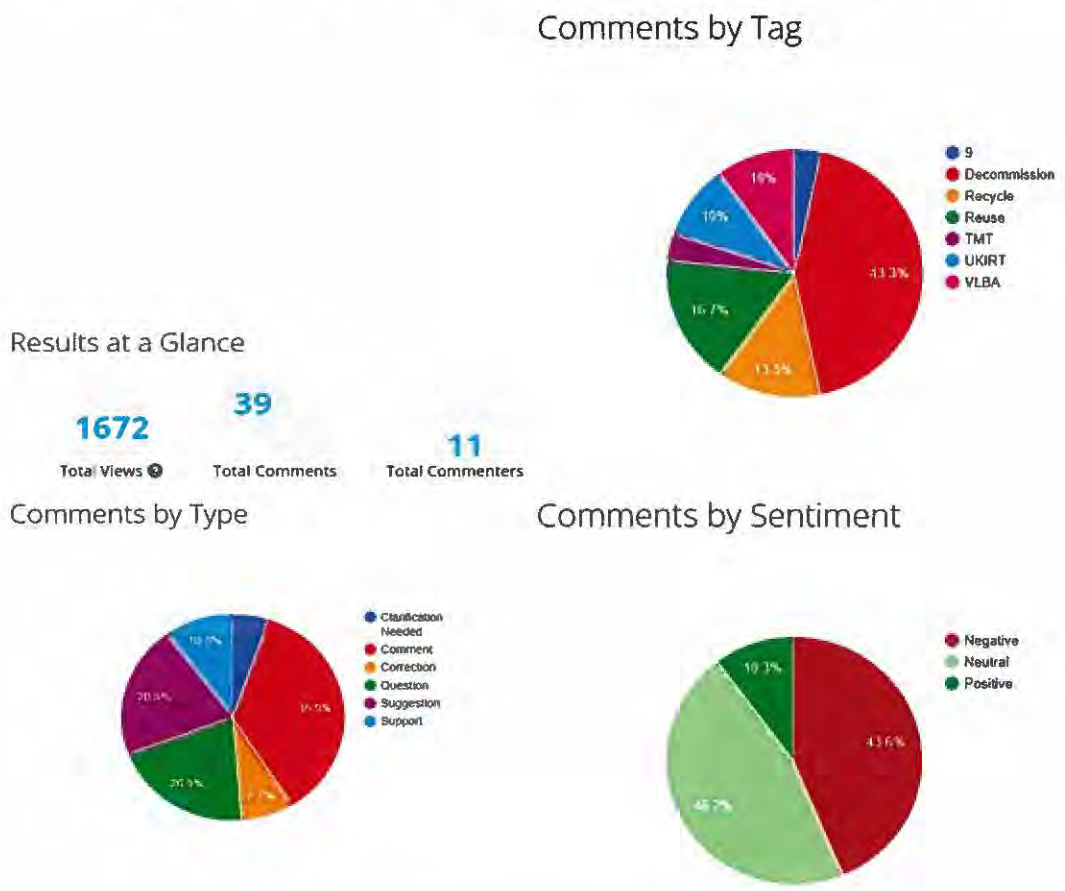


Figure 1. Overview of Konveio Comments

PUBLIC TESTIMONY

There was no public testimony received regarding the proposed Master Plan amendments at either of the September 8 or October 6 MKMB meetings. The amendments were agendized for review and action by MKSOA at their September 10 Board meeting. Following a presentation by CMS, the amendments were reviewed and discussed by the MKSOA Board. However, the Board decided to defer any action until their October board meeting.

At MKSOA's October 6 meeting, the Board chose to neither approve, oppose, nor formally comment on the proposed amendments. Rather, they voted to submit to the BOR all public testimony received at the meeting along with the video recording of the agenda item discussion. Those testimonies and a link to the recording of MKSOA's October 6 meeting will be submitted by MKSOA as their testimony to the BOR on this matter.

CMS reviewed the public testimony MKSOA received and found that the submittals were generally expressing opinions of support or opposition to the amendments and tended to not provide specific recommendations concerning the terms of the proposed amendments themselves. Below are the results of CMS's manual count of the testimonies:

	Oppose	Support	
Manual Count			
On-time Testimony	41	36	77 submissions
Late Testimony	14	24	38 submissions
Total	**55**	**60**	

CMS reviewed all comments provided by the public on Konveio as well as all the testimony that was received by MKSOA and incorporated the comments, making further edits and clarifications to the Master Plan amendment as warranted, and including those comments in the public comment review analysis.

PROPOSED AMENDMENTS

Amending the Master Plan first required identifying those sections addressing site reuse directly or which potentially were affected by a decision to reuse previously decommissioned astronomy facilities. Upon review, the following sections of the Master Plan were identified as needing to be amended:

1. Section 4.1.2 - UH Commitments
2. Section 4.3.2 - Astronomy Decommissionings
3. Section 4.3.3 - Continued Operation, Modifying, and/or Recycling Astronomy Sites and Facilities
4. Section 7.2 - Guidelines Applicable to New Astronomy Facilities in the MKSR.
5. Appendix E - Process to Establish Which Astronomy Facilities May Continue After 2033.

Clean and redline copies of only those sections of the Master Plan that required amendments can be accessed here: Amended Master Plan Sections. Clean and redline copies of the entire amended Master Plan can be accessed here: Amended Full Master Plan.

To align with Act 255, the primary proposed amendment to the Master Plan is in Section 4.1.2 where UH had committed to not reusing the five sites that were to be decommissioned under the plan for astronomy uses. Below is the redline copy of the original (~~blue strikethrough~~) and proposed (red) language to parts of Section 4.1.2 and the footnotes associated with those changes:

4.1.2 UH COMMITMENTS

This Master Plan reflects UH's specific commitments, which include:

- *By December 31, 2033, and throughout the remainder of the time covered by this plan, there will be not more than nine (9) operating astronomy facilities in the MKSR.*[24]
- *Astronomy sites where existing uses are proposed for decommissioning or former uses have been decommissioned will be prioritized for reuse over previously undisturbed lands when new astronomy or ~~Five of the 14 astronomy sites that existed in 2020 will be ineligible for future astronomy facility use once the existing astronomy facilities on them have been decommissioned.~~*[25] *~~They may be considered for~~ non-astronomy uses consistent with this Master Plan's framework are proposed.*[26]
- *Astronomy Site 13 will be the last new site developed for astronomy use in the MKSR. All future astronomy facilities will remain within the astronomy sites described in this Master Plan (Appendix F) ~~that remain eligible for future astronomy facility use~~.*
- *No land uses will be considered on major undeveloped cinder cones (pu'u) in the MKSR; this includes Pu'uala, Pu'uhoaka, Pu'ulīlīnoe, Pu'umāhoe, Pu'umākanaka, Pu'upoepoe, and Pu'uula.*[27]

[24] UH presently holds a General Lease from BLNR under which it grants rights to non-profit entities to construct, operate, and maintain astronomy facilities within the MKSR, in exchange for, among other things, access to world class facilities and research coordination. The General Lease expires at the end of 2033, before this Master Plan's 20-year planning horizon. This Master Plan is essential to UH's management efforts at least until 2033. After 2033, if UH is not granted a land authorization that includes the MKSR, whatever entity takes UH's place might adopt some, all, or none of this Master Plan in its planning efforts. It is possible that, per the General Lease and subleases, that all the existing astronomy facilities will need to decommission by the end of 2033 if UH or another entity is not granted a land authorization for all or portions of the MKSR.

[25] ~~As described in Section 4.3.4.3, a portion of Astronomy Sites 7 and/or 8 may continue to be utilized for astronomy if one of those sites is decommissioned and the other is selected for recycling.~~

[26] When the VLBA on Astronomy Site 14 is decommissioned, Astronomy Site 14 will not be available for future astronomy use unless the Management Plan in force at that time does not expressly prohibit its reuse (in 2026, the in force CMP's Decommissioning Plan (2010) states in Section 5.3: "The VLBA ... will not be replaced by another telescope once it is decommissioned").

[27] Pu'upoli'ahu and Pu'ukūkahau'ula are not included in this list, although they were mentioned in CMP management action FLU- 2, because they are not undeveloped and land uses, including habitat restoration, may be proposed on those pu'u.

Recommendation

As summarized in Section F above, CMS confirmed that the criteria for amending the Master Plan listed in Attachment B were satisfied. CMS also confirmed that all objectives summarized in Section E above have been achieved.

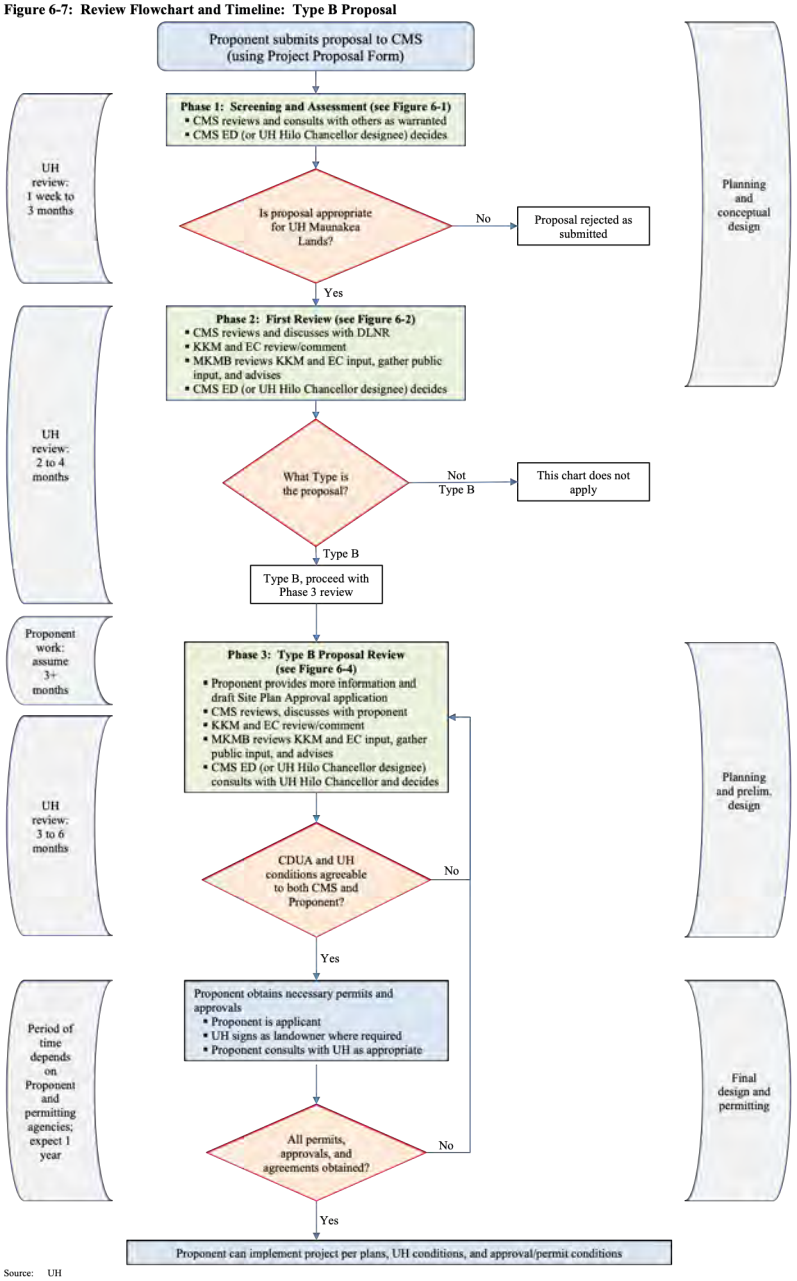
It is recommended the BOR approve the proposed amendments reviewed herein, and provided in the electronic copies accessed in Section H above, based upon the following: (i) satisfaction of the standards of review of the Master Plan for a Type B proposal; (ii) UH's amendment criteria and objectives being met, (iii) no new land uses being proposed; (iv) UH's intentions to ensure

consistency of the Master Plan with Act 255; and (v) the fact that the UH plans remain in force and effect until MKSOA adopts a management plan that supersedes the UH plans.

Attachment A

Attachment A
Master Plan Figure 6-7
Type B Proposal Review Process

Figure 6-7: Review Flowchart and Timeline: Type B Proposal



Source: UH

Attachment B

Attachment B
Phase 1 Proposal Review

2022 Master Plan Criteria	Project Consistency
Compliance with applicable University policies, as amended, related to real property held by UH, such as RP 10.201.	Act 255, signed into law on July 7, 2022, by Governor David Ige, is inconsistent with portions of the 2022 Master Plan, which is University policy. The proposal would harmonize University policy and state statute. The proposal is not known to conflict with other University policies.
Consistency with the mission, vision, goals, and objectives of the 2022 Master Plan.	It is consistent, it does not result in a modification to the mission, vision, goals, or objectives. Astronomy uses proposed in the Mauna Kea Science Reserve will continue to be reviewed and conditioned in a manner that addresses the mission, vision, goals, and objectives of the plan.
Consistency with the CMP and promotion of resource conservation and sustainability.	Not applicable. No activity or land use is proposed.
Extent to which the proposal has the potential to adequately benefit from the conditions present within the UH Maunakea Lands.	Not applicable. No activity or land use is proposed.
Extent to which the proposal has the potential to adequately increase our understanding of Maunakea's resources.	Not applicable. No activity or land use is proposed.
Extent to which the proposal has the potential to adequately avoid, minimize, or mitigate reasonably foreseeable adverse impacts to Maunakea's resources.	Not applicable. No activity or land use is proposed.
Extent to which the proposal has the potential to adequately, if applicable, employ world-class technology, research techniques, and design.	Not applicable. No activity or land use is proposed.
Extent to which the proposal has the potential to adequately, if applicable and based on input from experts in the proposed field of study, the proposal addresses critical needs and has a high likelihood of contributing important information over its design life.	Not applicable. No activity or land use is proposed.
Extent to which the proposal has the potential to adequately honor and benefit the Hawai'i Island community, particularly with regard to their educational, cultural, social, environmental, and economic needs.	Not applicable. No activity or land use is proposed.
Consistency with the requirements of the HRS Chapter 183C, and HAR Chapter 13-5, regarding land uses within the State Conservation District.	Not applicable. No land use is proposed.

2022 Master Plan Criteria	Project Consistency
Consistency with the terms and conditions of CDUPs that have been issued that are relevant to the proposal.	The revision is consistent with all permit terms and conditions, except CDUP-3568 special condition 10. It is unknown if CDUP-3568 will be exercised. There are three scenarios: 1) Should TIO proceed with developing the Thirty Meter Telescope on Astronomy Site 13, then CDUP-3568, including Special Condition 10, will continue to be complied with, and three astronomy sites permanently removed from consideration for new astronomy uses. 2) TIO does not develop the Thirty Meter Telescope on Astronomy Site 13 and CDUP-3568, including Special Condition 10, becomes moot. 3) If (a) TIO desires to use another astronomy site or (b) a different use is proposed on Astronomy Site 13, then CDUP-3568, including Special Condition 10, becomes moot and a new land use application, HRS Chapter 343 review, and land disposition will be required.
Consistency with the Design Guidelines set forth in the 2022 Master Plan Part 3, Chapter 7, or, where inconsistent, provide adequate justification for any variance from those guidelines that is being sought.	Not applicable. No land use is proposed.

Attachment C

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
47	By allowing formerly decommissioned observatory sites to be reused, UH risks perpetuating the cumulative cultural and environmental impacts of decades of astronomy development instead of allowing these lands to return toward their natural state. Repeated reuse raises serious Ka Paʻakai concerns about cumulative impacts on cultural resources and Native Hawaiian traditional and customary practices.	Environmental Concerns Continued reuse of decommissioned sites prevents land recovery to its natural state. Prolonged impacts on ecosystems from decades of astronomy development. Cultural Concerns Cumulative impacts on Native Hawaiian cultural resources and practices. Potential Ka Paʻakai issues affecting traditional and customary rights.	Comment	Reuse, Recycle, Decommission	Author 11
46	Act 255 provides for existing UH plans to remain in place until they are superseded by MKSOA. UH is not required by Act		Comment		Author 11

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
	255 to weaken the current Master Plan's protections before the transition.				
45	Will these types of arrangements be subject to community feedback?		Question		Author 11
44	The draft strikes out the explicit rule that decommissioned sites "will be ineligible for future astronomy facility use." Deleting this text is an administrative choice, not a statutory requirement.		Comment	Decommission	Author 11
43	Saying "sites that have been decommissioned will be prioritized for reuse" contains no actual directive for University of Hawai‘i to decommission sites or restore the ‘āina. This reads like University of Hawai‘i still intends to "reuse."		Comment	Reuse, Decommission	Author 11

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
42	I agree with it all			Support	Author 10
41	TMT just rejected Las Palmas as a location for undisclosed reasons. The 2026 legislature just made Mauna Kea revert back to UH if the Mauna Kea Stewardship Authority does not organize itself by 2028. Ignoring decades of community opposition, UH is now proposing these plan revisions to clear a path for the TMT on Mauna Kea. This is wrong.	TMT Location Decision TMT rejected Las Palmas as a location for undisclosed reasons. Legislative Changes 2026 legislature will revert Mauna Kea to UH if stewardship authority fails by 2028. Community Concerns Long-standing community opposition being overlooked in renewed UH proposals for Mauna Kea. UH Strategic Actions UH revising plans to facilitate TMT development on	Question	TMT	Author 9

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
		Mauna Kea despite opposition.			
38	agree with this revision		Support		Author 8

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
39	support revision		Support		Author 8
40	Support these revisions. It is important that Maunakea continue to be used for astronomy purposes. The ancient Hawaiians were explorers and they would support exploring our heavens.		Support		Author 8
33	The stated purpose to update UH's 2022 Master Plan makes NO SENSE at all at this time. Although this plan was originally meant to guide UH's decision-making over a 20-year period, but Act 255 was passed by the legislature to transition UH's decision-making to MKSOA by July 1, 2028 and UH's 2022 Master Plan will be superseded by a plan to approved by the MKSOA. So this		Comment		Author 7

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
	attempt to revise this plan is a waste of time and resources of taxpayers funds allocated to UH as well as the time of the public to summit comments for a revised plan to be associated with Act 255. Whose idea was this? This is clearly a blatant attempt to appease TIO to attempt to build on Mauna Kea instead of the Canary Islands.				
34	As the result of Act 255, UH's commitments don't matter as UH won' t be in any decision-making position to approve any actions pertaining to these commitments during the transition period or after MKSOA assumes authority in 2028.		Comment		Author 7
35	Why isn't this section being updated? Because this proposed		Comment		Author 7

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
	revision plan makes NO SENSE at all.				
36	Is this CDUP still valid?		Clarification Needed		Author 7
37	Requesting an e-copy of the proposed revisions be sent to my email so that it can be viewed easier if printed out in a hard copy format.		Suggestion		Author 7

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
32	I have difficulty in sensing that I completely understand the administrative ramifications of the current as well as revised Master Plan. I do strongly support construction/maintenance of facilities that keep Mauna Kea astronomy leadership in world astronomy. I delight in knowing that several astronomic discoveries bear Hawaiian names. I believe that future modifications/construction efforts can and should extend Hawaiian values of exploration and respectful use of the land. With the hope that the proposed modifications promote these goals and values I support them.	Understanding the Master Plan Difficulty grasping the administrative ramifications of current and revised Master Plan. Support for Astronomy Leadership Strong support for maintaining Mauna Kea's leadership in global astronomy. Cultural Significance Appreciation for Hawaiian names tied to astronomical discoveries. Advocacy for integrating Hawaiian values in future modifications and land use. Conditions for Support Support contingent on proposed modifications	Comment		Author 6

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
		promoting exploration and respectful land use.			
30	Having all new agreements in place by January 1, 2027 seems to be a tight timeline. With only 3 months left, does		Question		Author 5

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
	this timeline remain achievable?				
31	This is a great point - we should keep in mind that modification and recycling doesn‘t always mean bigger facilities. I agree that our technology has changed significantly since the 1980‘s and we can do a lot more with less of a footprint.		Comment	Reuse, Recycle	Author 5

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
24	Thought needs to be given how to message this with VLBA given demonstrated sensitivities and the likelihood of NRAO (maybe NSF) asking why UH isn't allowing reuse of the VBA site if UH is opening up the MP. Perhaps a new item in the FAQ can be used to point out that MKSOA will be the ultimate decider, and MP changes here are intended to avoid opening up the CMP (and associated Decom Plan), to avoid an even more complex process.	Communication Strategy Consider messaging coordination with VLBA due to demonstrated sensitivities. Anticipate questions from NRAO or NSF regarding UH's stance on VBA site reuse. FAQ and Stakeholder Guidance Add an FAQ item clarifying MKSOA as the ultimate decision-maker. Highlight that MP changes aim to prevent opening up the CMP and Decom Plan. Process Simplification Emphasize the intention to avoid a more complex procedural process.	Comment	VLBA, Reuse, Decommission	Author 4

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
25	The UKIRT NOI was approved and U His in the process of developing the UKIRT decom plan.		Correction	UKIRT, Decommission	Author 4
26	As was done with the UKIRT update footnote, might include an update via footnote about the current state of the decom of HK and CSO		Suggestion	UKIRT, Decommission	Author 4
27	Again, a footnote providing an update might be useful here.		Suggestion		Author 4
28	Might mention this requires VLBA to be decom'd as well to reach 9 with no TMT.		Comment	VLBA, 9, Decommission	Author 4

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
29	This implies UH should request decom notices from MKOs early next year in the absence of lease extensions, or at least significant progress toward acquiring extensions. Something only MKSOA is authorized to do. I don't think we (UH) have discussed this conundrum in much depth - only flagged it as a pending issue.	Topics Lease Extensions and Decommission Notices UH should request decom notices if lease extensions show no progress next year. Early notices ensure preparedness in case lease extensions are not secured. Authorization and Responsibility Only MKSOA is authorized to handle lease extensions and related actions. Lack of Discussion on Issue UH has not discussed the lease extension issue thoroughly, only identified it as pending.	Comment	Decommission	Author 4

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
23	As noted, this is what the in-force Decommissioning Plan requires, but NSF/AUI/NRAO appear to anticipate that the VLBA site could be re-used for ngVLA. It may be worth reaching out in advance to explain this note and the need for them to engage with MKSOA if they expect to seek a change to allow future re-use of the site.	VLBA Site Reuse and Decommissioning Plan Current Decommissioning Plan requires specific actions for the VLBA site. NSF/AUI/NRAO anticipate potential reuse of the VLBA site for ngVLA. Coordination needed with MKSOA to address future site reuse expectations. Communication and Engagement Suggest reaching out in advance to explain reuse considerations. Need to involve MKSOA for changes allowing future site reuse.	Comment	VLBA, Reuse, Decommission	Author 3

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
6	This date already passed, should it be updated?		Question		Author 1
9	Modify "Modification & Recycling Probability" column to reflect end of operations and beginning of decommissioning phase, or make reference to footnote # 29. Same with Discussion column		Suggestion	Decommission, Recycle	Author 1
12	does this date need to be revised?		Question		Author 1
7	Except for biological monitoring, haven't these facilities completed decommissioning?		Question	Decommission	Author 2
10	Add "be": "not be replaced"		Correction		Author 2

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
11	Suggest revising to: "accepted by (name the responsible authority)"		Suggestion		Author 2
13	Suggest rewriting and dividing sentences to make clear what happens if the 13N site is developed and why (i.e., 'then two existing astronomy facilities must be decommissioned, [in accordance with the TMT CDUP?]. If 13N is not developed, then only one more facility will be decommissioned').	Clarity and Sentence Structure Suggest rewriting sentences for improved clarity and readability. Recommend dividing sentences to make complex information easier to understand. Development Scenarios and Implications Explain explicitly what happens if the 13N site is developed. Clarify consequences of not developing the 13N site. Confirm decommissioning requirements align with TMT	Clarification Needed	Decommission	Author 2

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
		Conservation District Use Permit (CDUP).			
15	Suggest revising to "weather-monitoring instruments"		Suggestion		Author 2

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
16	Shouldn't this section be added on to the preceding bullet point? That would also reduce some of the clunky, repetitive wording.		Question		Author 2
17	Suggest revising to: "...the only presently-known potential... project is the Maunakea Spectroscopic Explorer (MSE) at CFHT..."		Suggestion		Author 2

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
18	There should be consistency using "and/or" relating to modification and recycling scenarios. The "and" here is not consistent. Also suggest stating which scenario applies, such as "Recycling Highly unlikely" for Subaru; "(Modification or Recycling?) Slight" for IRTF; Modification Moderate for CFHT...	Consistency Ensure consistent usage of "and/or" in modification and recycling scenarios. Address inconsistency in the use of "and" within the document. Specific Scenarios Clearly state the applicable scenario for each entity (e.g., Subaru, IRTF, CFHT). Provide likelihood descriptions (e.g., "Recycling Highly unlikely," "Modification Moderate").	Comment	Recycle	Author 2
19	Add comma here		Suggestion		Author 2

Comment ID	Comment	Summary (AI generated)	Type	Tags	Author
20	This should be updated to reflect CSO and Hoku Kea completing decommissioning and UKIRT as third in line with its NOI.		Correction	UKIRT, Decommission	Author 2
21	We know two separate CDUPs cover Keck I and II. But isn't the WMKO truly a single facility?		Question		Author 2



UH Board of Regents
Facilities and Long-range Planning Committee
Nov 5, 2026

UH Master Plan Amendment Update

Photo Credit: CMS Rangers

ALIGNING THE MASTER PLAN TO SUPPORT SITE RE-USE CONSISTENT WITH ACT 255

Act 255 (§-6)

"(d) The authority shall be responsible for the establishment of a framework for astronomy-related development on Mauna Kea. The framework may include:

(2) Prioritizing the reuse of footprints of observatories that are scheduled for decommissioning, or have been decommissioned, as sites for facilities or improvements over the use of undeveloped lands for such purposes;"

15

UH Maunakea Master Plan 2022

"Five of the 14 astronomy sites that existed in 2020 will be ineligible for future astronomy facility use once the existing astronomy facilities on them have been decommissioned. They may be considered for non-astronomy uses consistent with this Master Plan's framework." (Section 4.1.2)

Act 53 Amending Act 255

- Transition date extended to 12/1/29
- 2 Reversion dates:
  - 6/30/28 Adopt Management Plan
  - 12/31/29 Submit Admin Rules
- Existing UH plans and rules "remain in force and effect" until replaced by MKSOA's

- "Notwithstanding any provision herein or any other law to the contrary, title to the Mauna Kea lands shall remain with the State. The board of land and natural resources shall retain the leased-fee interest or fee interest."
- During the transition period MKSOA is granted authority to extend existing leases for up to 10 years with an exemption from Ch 343 requirements
- CDUPs run with the land

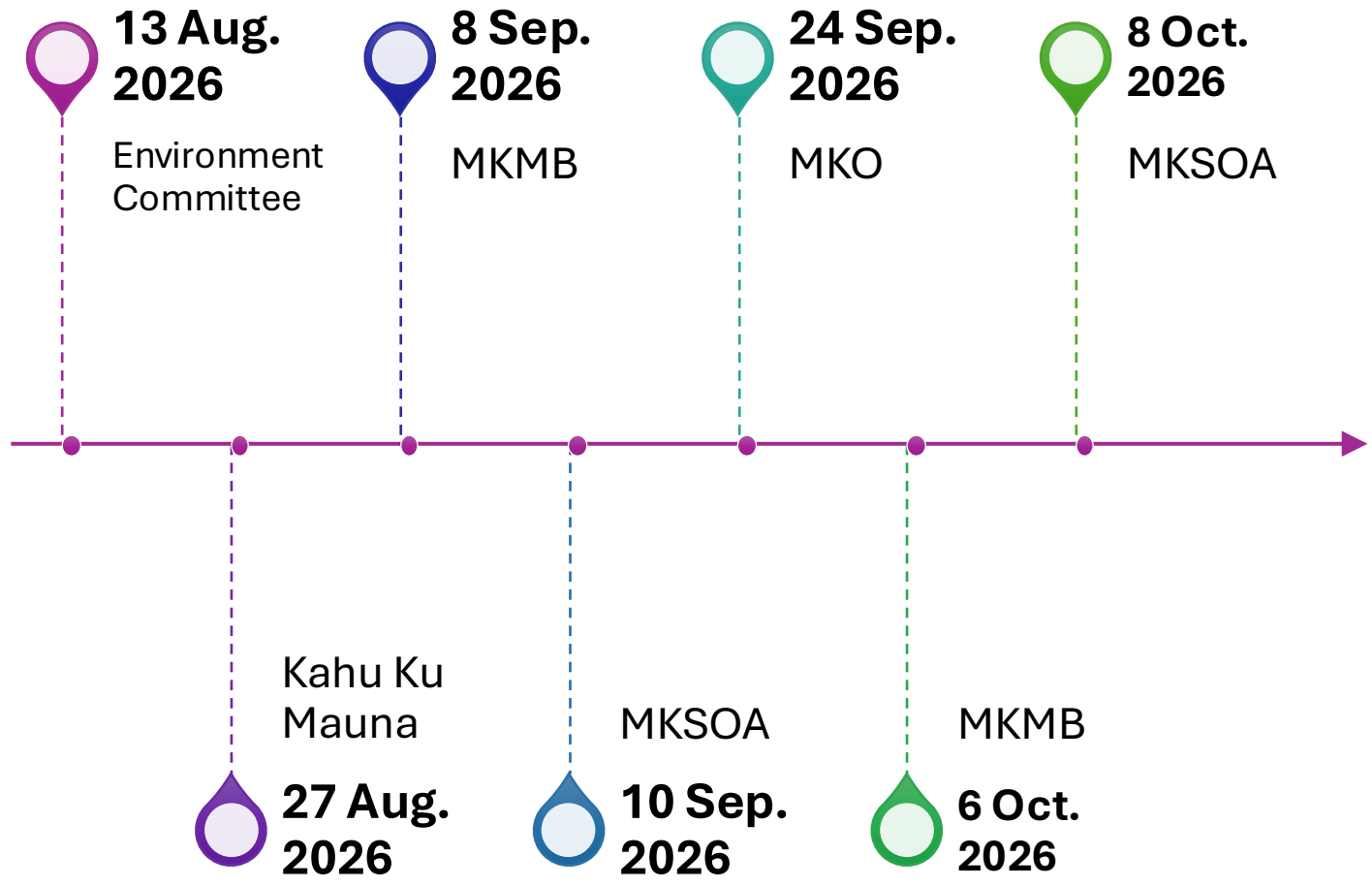
Amendment Objectives

1. Limit changes to the UH Master Plan only, not other governing documents.
2. Maintain UH's commitments to a post-2033 astronomy footprint of no more than nine observatories in the Maunakea Science Reserve **("MKSR")**.
3. Decommissioning commitment and process, including subplans, remain unchanged.
4. CDUP 3568 conditions remain unchanged (TMT).
5. Clarify and communicate that MKSOA's eventual management plan may change site reuse availability and requirements.

Sections Amended

- Section 4.1.2 - UH Commitments
- Section 4.3.2 - Astronomy Decommissionings
- Section 4.3.3 - Continued Operation, Modifying, and/or Recycling Astronomy Sites and Facilities
- Section 7.2 - Guidelines Applicable to New Astronomy Facilities in the MKSR.
- Appendix E - Process to Establish Which Astronomy Facilities May Continue After 2033.

Advisory Group Consultations



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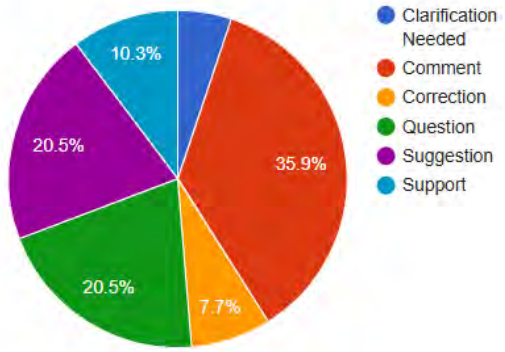
Konveio Results

Sept 9 – Oct 14, 2026

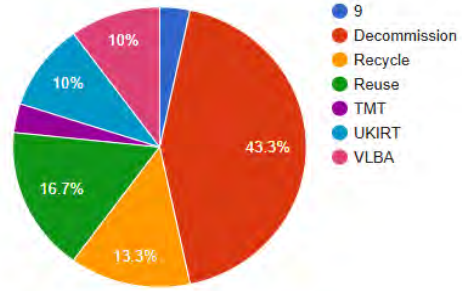
Results at a Glance

1672	39	11
Total Views	Total Comments	Total Commenters

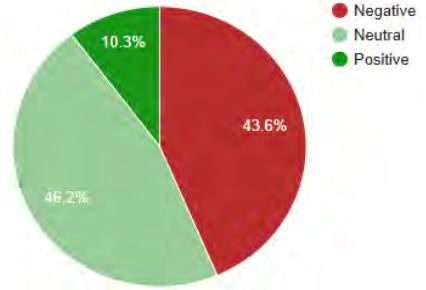
Comments by Type



Comments by Tag



Comments by Sentiment



	Oppose	Support		
Manual Count				
On-time Testimony	41	36		77 submissions
Late Testimony	14	24		38 submissions
Total	**55**	**60**		

MKSOA Oct 8 Public Testimony

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Section 4.1.2: Primary Amendment

4.1.2 UH COMMITMENTS

This Master Plan reflects UH's specific commitments, which include:

- *By December 31, 2033, and throughout the remainder of the time covered by this plan, there will be not more than nine (9) operating astronomy facilities in the MKSR.*[24]
- *Astronomy sites where existing uses are proposed for decommissioning or former uses have been decommissioned will be prioritized for reuse over previously undisturbed lands when new astronomy or ~~Five of the 14 astronomy sites that existed in 2020 will be ineligible for future astronomy facility use once the existing astronomy facilities on them have been decommissioned.~~*[25] *~~They may be considered for~~ non-astronomy uses consistent with this Master Plan's framework are proposed.*[26]
- *Astronomy Site 13 will be the last new site developed for astronomy use in the MKSR. All future astronomy facilities will remain within the astronomy sites described in this Master Plan (Appendix F) ~~that remain eligible for future astronomy facility use~~.*
- *No land uses will be considered on major undeveloped cinder cones (puʻu) in the MKSR; this includes Puʻuala, Puʻuhoaka, Puʻulīlīnoe, Puʻumāhoe, Puʻumākanaka, Puʻupoepoe, and Puʻuula.*[27]



Questions

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Photo Credit: USGS, July 30, 2026