

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JASON WOLFORD; ALISON  
WOLFORD; ATOM KASPRZYCKI;  
HAWAII FIREARMS COALITION,

Plaintiffs,

v.

ANNE E. LOPEZ, in her official  
capacity as Attorney General of the  
State of Hawai'i; MAUI COUNTY,

Defendants.

Civil No. 1:23-cv-00265-LEK-WRP

**DECLARATION OF PATRICK MCCALL**

I, Patrick McCall, declare under penalty of perjury that the following is true and correct:

1. I am the Director of the Department of Parks and Recreation for the County of Maui (Department). I have personal knowledge of and am competent to make this Declaration. I note that some of the materials discussed in this Declaration reflects information previously prepared by Department staff and/or available on our Department website.

2. The mission of the Department is to provide safe, satisfying, and cost-effective recreational opportunities for the residents of and visitors to Maui County.

Our goal is to provide high-quality parks, recreational facilities, and recreation programming opportunities to the youth, persons with disabilities, senior citizens, and adults of Maui County, through collaborative partnerships and community interaction.

3. The County of Maui operates over 130 park and recreation areas on the three islands of Maui, Lānaʻi, and Molokaʻi.

4. Many of our parks are very popular with children and families. Many of our County parks include playgrounds. Playground facilities are used by children, including young children, and are popular with local families and visitors as well. In recent years, the Department has made significant investments in playground facilities. These facilities are a crucial resource for children and facilitate healthy physical activity and socialization.

5. Many of our park facilities are regularly used by families and children. In fact, 22 schools operated by the State Department of Education (“DOE”) are located immediately adjacent to, or within one block of, one of our parks. Most of those parks have playgrounds. The DOE, as well as private schools, regularly use facilities operated by the Department, including for field trips. Additionally, a number of our parks include recreation facilities that are regularly used by children and youth.

6. For example, Napili Park has numerous recreational activities, including a Little League Field, a playground, picnic areas, pickleball courts, tennis courts, and basketball courts. *See*

<https://www.mauicounty.gov/DocumentCenter/View/4725/Visio422NapiliPark?bidId=>; <https://www.mauicounty.gov/Facilities/Facility/Details/139>. These facilities are regularly used by children and youths.

7. In addition, the Lahaina Recreation Center borders the Boys & Girls Club of Maui – Lahaina. *See*

<https://www.mauicounty.gov/Facilities/Facility/Details/208>. The Lahaina Recreation Center is utilized by a number of local sports teams and includes a playground, facilities for little league, softball, baseball, soccer, football, basketball, and volleyball. *Id.* It also includes a Youth Center.

<https://www.mauicounty.gov/DocumentCenter/View/5078/Lahaina-Recreation-Center-Site-Map?bidId=>. It is located just down the street from the Kamaaina Kids – Lahaina Preschool (<https://www.kamaainakids.com/locations/lahaina-preschool>).

*See id.* (indicating that “[p]reschool classes take field trips to the pool and park weekly”). The Lahaina Recreation Center is also located close to the King Kamehameha III Elementary School. (<https://www.kkiii.org/>).

8. To take another important example, Keōpūolani Regional Park (<https://www.mauicounty.gov/DocumentCenter/View/4754/Visio134EKeopuolani>

[RgPark?bidId=](#)) includes numerous facilities for children and families. *See* <https://www.mauicounty.gov/Facilities/Facility/Details/Keopuolani-Regional-Park-400>. The park is centrally located in Central Maui (Kahului) and is adjacent to the world-renowned Maui Arts and Cultural Center.

9. Keōpūolani Regional Park is also adjacent to the Central Maui Building of the Boys & Girls Club of America<sup>1</sup> and the Maui YMCA Complex. The War Memorial Regional Complex, which is part of Keōpūolani Regional Park, has hosted the Maui County Fair. <https://mauifair.com/>.

10. Keōpūolani Regional Park includes a football stadium, <https://www.mauicounty.gov/DocumentCenter/View/4750/Visio134A1WarStencil?bidId=>, Little League fields, <https://www.mauicounty.gov/DocumentCenter/View/4751/Visio134BBallfields?bidId=>, and other recreational facilities, <https://www.mauicounty.gov/DocumentCenter/View/4756/Visio134X2RegionalOverview?bidId=>.

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<sup>1</sup> <https://bgcmaui.org/s/>. According to the Boys and Girls Club website, “Boys & Girls Clubs of Maui is a second home for Maui’s keiki. During those critical hours when school is out and youth are often left unsupervised, BGCM Clubhouses provide a safe and positive environment where youth can be themselves and participate in high quality programs. We are more than a daycare or study hall; Clubs are a place of 100% respect, where kids come first and great futures start.” *Id.*

11. To take another example, Maui Lani Park is located right next to Pōmaika‘i Elementary School, which is home to approximately 550 students in grades K-5 (<https://pomaikai.k12.hi.us/>).  
(<https://www.mauicounty.gov/Facilities/Facility/Details/Maui-Lani-Regional-Park-413>)

12. Other County Parks are located next to other types of school facilities. For example, Wailuku Elementary School Park is located right next to Wailuku Elementary School. *See* <https://www.mauicounty.gov/facilities/Facility/Details/185>;  
<https://www.mauicounty.gov/DocumentCenter/View/4810/Visio131WailukuElementary?bidId=>.

13. Keōpūolani Regional Park borders the University of Hawaii Maui College, <https://maui.hawaii.edu/>, a public college and one of the branches of the University of Hawaii System.

14. Many other youth-focused programs use the Park system. For example, H.A. Baldwin Park (<https://www.mauicounty.gov/Facilities/Facility/Details/165>) hosts the Pa‘ia Youth & Cultural Center (PYCC), which provides social, educational, cultural, vocational, and recreational experiences for youth aged 9-18 years old for Pa‘ia and surrounding communities.

15. The County Parks System also hosts numerous classes for community members. *See* <https://www.mauicounty.gov/257/Community-Classes>

16. The “Play and Learn Sessions” (PALS) Program is administered by the County Parks Department. PALS provides quality cultural and recreational programming for children ages 5 to 12 during the summer and intersession periods for all schools. The program serves approximately 2,805 children in Summer and Winter PALS sessions. *See*

[https://www.mauicounty.gov/DocumentCenter/View/99167/060\\_12\\_Parks-and-Recreation](https://www.mauicounty.gov/DocumentCenter/View/99167/060_12_Parks-and-Recreation).

17. The mission of PALS is to provide a safe, nurturing, and quality recreation program for the children of Maui County that addresses their physical, social, cultural, and educational needs during summer and intersession breaks.

18. Additional details on the PALS Program are available at the following websites:

<https://www.mauicounty.gov/589/PALS-Program;>

<https://www.mauicounty.gov/DocumentCenter/View/139258/ABOUT-PALS-for-Parents;>

<https://www.mauicounty.gov/DocumentCenter/View/139261/A-Day-In-the-Life-of-PALS-for-Parents;>

<https://www.mauicounty.gov/DocumentCenter/View/139271/PALS-EVENTS-AND-PROGRAMS;>

[https://www.mauicounty.gov/DocumentCenter/View/139259/THE-PALS-  
EXPERIENCE.](https://www.mauicounty.gov/DocumentCenter/View/139259/THE-PALS-EXPERIENCE)

19. Many of our park facilities are frequented by persons with disabilities and are ADA accessible.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. 1746.

Executed on July 13, 2023 at Wailuku, Maui.

