

Public Scoping for an Environmental Assessment: Fencing and Conservation Work in Nu‘u

Final Report
June 2015

Prepared for:



National Park Service
Haleakalā National Park
Box 369
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Prepared by:



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Acronyms

EA	Environmental Assessment
HNP	Haleakalā National Park
NPS	National Park Service
PEPC	Planning, Environment and Public Comment
SRGII	Sustainable Resources Group Intn'l, Inc.

1 Introduction

On April 17, 2015 the National Park Service (NPS) announced a 30 day public scoping period regarding proposed fencing and conservation work in Nu‘u on the leeward slope of Haleakalā. Public scoping was initiated to obtain input on the proposed project including two different fence line configurations and related conservation efforts. The public scoping process included the release of public scoping materials, solicitation of comments, and two public meetings.

Public scoping materials outlined the proposed project, its purpose and need, options for two different fence line configurations, the topics to be addressed in an Environmental Assessment (EA), and the conservation activities that would be undertaken in support of the goals and objectives of the proposed project. Scoping materials were presented to the public in the form of: a newsletter sent out via email to individual citizens and posted on both the Haleakalā National Park (HNP) and the NPS Planning, Environment and Public Comment (PEPC) websites; and a press release sent to local newspapers, radio stations, government officials and non government organizations. Government agencies and non-government organizations identified as potentially interested parties were sent letters via the U.S. mail.

HNP staff, with assistance from its consulting team Sustainable Resources Group Intn’l, Inc. (SRGII), held public scoping meetings for the proposed project on May 13, 2015 at Kula Community Center, Kula, Maui and on May 14, 2015 at Hana High and Elementary School Cafeteria in Hana, Maui. The meetings were advertised through the PEPC website, local news (web and print), emails, and written letters. They were also announced on the Park website. A total of fourteen people signed in during the two meetings, thirteen in Kula and one in Hana. Attendees had the opportunity to review displays illustrating the project area, the purpose and need, and the resources and concerns to be addressed in the EA. The meetings began with a short presentation by HNP personnel about the proposed project and then were opened for discussion and comment. HNP and SRGII staff were on hand to answer questions. A standardized comment sheet was provided for guests. Guests could submit written comments at the public meeting or submit them at a later date via email, mail, or the PEPC website.

The public scoping process was successful in identifying topics and issues to be evaluated and considered. This public scoping report has been produced to assist the HNP team in organizing and incorporating public comments and concerns as part of the National Environmental Policy Act process.

2 Comment Analysis

2.1 Correspondence Distribution

A total of nine comments on the proposed project were received. Seven comments were received from people who had attended a public meeting, although not all of them submitted comments at the meeting. Although Federal, State, and County agencies were included in the scoping process and received written materials, no comments were received from any government agencies. All respondents are residents of the State of Hawai'i.

Table 1. Correspondence Distribution by Organization Type

Organization Type	Number of Correspondences
Federal Government	0
State Government	0
County Government	0
Non-Governmental	4
Unaffiliated Individual	5
Total	9

Table 2. Correspondence Distribution by Correspondence Type

Type	Number of Correspondences
PEPC Site (Web Form)	0
Public Meeting	3
Letter	0
Park Visitor Center	0
E-Mail	5
Verbal ¹	1
Total	9

¹ Although NPS requested all comments be submitted in written form, the one attendee at the Hana public meeting was a 91 year old woman who is a long term resident of Kaupo and gave comment in verbal form. Her comments are being included in the written report and taken into consideration in the comment analysis.

2.2 Concerns and Comments

Topics mentioned in all comments were organized by subject matter and are summarized in Table 3.

Table 3. Topics Contained in Comments

Topic	Number of Comments on Listed Topic
Support for the Proposed Project	5
Against the Proposed Project	0
Support for Concept 1 (Enclosing 2115 Acres)	4
Support for Concept 2 (Enclosing 1342 Acres)	1
Recreational/ Public Access and Use (Not Necessarily Including Hunting)	4
Hunting Access	2
Feral Ungulate Removal	1
Using Fencing in Conservation Efforts	2
Concern About Development	1
Use of Volunteer Resources	1
Support for Restoration Efforts of Native Flora and Fauna	3
Coordination with Other Federal and State Agencies and Private Entities	2
Project Implementation Logistics	1

Comments associated with each topic are listed below. Comments under each topic are grouped by author (i.e. if one person had multiple comments on the same topic, they are all contained in one bullet). Complete text of comments is contained in Appendix D.

Topic: Support for the Proposed Project

Comments:

- This project would be a valuable addition to the restoration of the native flora and fauna of the leeward slope of Haleakala. The potential for restoring these lands can easily be seen by looking at the effect of previous National Park fencing and the contrast to unfenced lands adjacent. Vegetation returns and native species such as the 'Ua'u, 'A'o and 'Ake 'Ake have enhanced potential for recovery.
- The Proposed fencing of the NPS area of Nu'u ahupua'a is an excellent idea and will result in long term success of the 'ua'u. Please act as quickly as reasonably possible.
- The Friends of Haleakala supports the proposed conservation work on the Leeward Haleakala Slope including the Nu'u Parcel.
- I strongly support all efforts to provide additional breeding and nesting habitat for the 'ua'u.
- Thank you for beginning public input on the proposed work at Nu'u. Thank you for providing scarce public resources towards fencing at Nu'u. I hope to attend one of your two meetings in May, if my schedule allows, as I am in full support of the Park's proposed efforts.

Topic: Support for Concept 1 (Enclosing 2115 Acres)

Comments:

- The highest use of these lands, in my opinion, is for the restoration of the native vegetation community and the native fauna which once thrived there. Concept 1 is the best option for achieving this result.
- The more area included, the better.
- We also encourage the NPS to consider and evaluate options that would protect the largest feasible area focusing on the upper elevations.
- The expansion of the conservation area to 2,115 acres, Concept 1, is recommended.

Topic: Support for Concept 2 (Enclosing 1342 Acres)

Comments:

- Of the 3 proposals, I would prefer the second concept where the proposed fence remains entirely NPS land.

Topic: Recreational/ Public Access and Use (Not Necessarily Including Hunting)

Comments:

- Public access, even if it were accommodated with trails would be of minimal value due to the rugged nature of the terrain. The National Park and the state budgets for trails are not adequate to keep the current inventory of trails in prime condition. Burdening these agencies with additional trails in marginal areas for minimal public use is not good use of tax dollars.
- We also encourage the NPS to consider and evaluate what impact such conservation work may have on any future recreational use of the Nu'u parcel.
- We are concerned with the bottom section and the possible visitor traffic that will impact our community. Please keep us informed in this future process.
- Currently Kahikinui Forest Reserve (the adjoining State parcel) has no meaningful public access because surrounding land owners, including the NPS, has refused to grant easements for access. Members of the public have been encouraging the State of Hawaii to open access to this unique alpine area. A large portion of Kahikinui Forest Reserve was recently fenced off to create the Nakula Natural Area Reserve. The NARS Program has a history of fencing off land parcels and prohibiting public access. The Nakula NAR was created despite strong public opposition. To see the NPS propose taking control of another portion of the already diminished public forest is painful to see.

Topic: Hunting Access

Comments:

- The lands proposed for fencing are not good hunting areas due to their remote and extremely steep character.
- While I understand the value of fencing and ungulate removal in protecting endangered species, I am concerned about the loss of 230 acres of public hunting land (Kahikinui Forest Reserve) in the proposed Concept 1. Currently Kahikinui Forest Reserve (the adjoining State parcel) has no meaningful public access because surrounding land owners, including the NPS, has refused to grant

easements for access. Members of the public have been encouraging the State of Hawaii to open access to this unique alpine area.

Topic: Feral Ungulate Removal

Comments:

- I would also like to see some system set up where public hunters are allowed to assist in removing ungulates, or the meat is recovered and distributed to the public after eradication operations.

Topic: Using Fencing in Conservation Efforts

Comments:

- The potential for restoring these lands can easily be seen by looking at the effect of previous National Park fencing and the contrast to unfenced lands adjacent. Vegetation returns and native species such as the 'Ua'u, 'A'o and 'Ake 'Ake have enhanced potential for recovery.
- Fencing without an aggressive program to control feral and introduced animals (feral goats, feral pigs, feral dogs, axis deer, and cattle), remove invasive, non- native plants, increasing native plant cover through outplanting and seed scatter is counterproductive, ineffectual and wasteful of time and economic resources.

Topic: Concern About Use and Development

Comments:

- Her main concern was that she does not want to see any increased use of or development in the area because so much has already changed.

Topic: Use of Volunteer Resources

Comments:

- We encourage the NPS, as part of its evaluation and planning process to determine if there are ways to use community volunteer resources to help remove invasive plants and animals and re-plant natives in such a way that this can be done safely and productively.

Topic: Support for Restoration Efforts of Native Flora and Fauna

Comments:

- This project would be a valuable addition to the restoration of the native flora and fauna of the leeward slope of Haleakala. The highest use of these lands, in my opinion, is for the restoration of the native vegetation community and the native fauna which once thrived there.
- We would encourage the NPS, in the planning and assessment processes to consider the positive impact that such conservation will have on all native plants and animals in addition to the ua'u.
- Control feral and introduced animals (feral goats, feral pigs, feral dogs, axis deer, and cattle), remove invasive, non- native plants, increasing native plant cover through outplanting and seed scatter. The programs now in place have made a contribution towards restoral of the critical habitat. The overall impact and success of these programs are measured.

Topic: Coordination with Other Federal and State Agencies and Private Entities

Comments:

- I do understand the particular work that lies ahead for this project and that it will be a major process to protect, restore and preserve this habitat for active species on the leeward Haleakala slope. Thank you. We (Aha Moku O Kaupo) are available for consultation, a possible partnership and could assist in protecting and preserving this area and project.
- Collaboration with the State of Hawaii, your Federal Partners and private sector organizations will provide the infrastructure and funding to achieve effectively, efficiently and successfully the preservation, protection, maintenance and restoral of the natural habitat and protected species on Haleakala. The Hawaii Conservation Corps, Kupu is a member of SCA. Kupu serves the islands of Kauai, Oahu, Molokai, Lanai, Maui and Hawaii Island and is based out of Honolulu, Hawaii. The State of Hawaii, Department of Land and Natural Resources; State of Hawaii, Department of Health; NOAA; United States, Environmental Protection Agency; Kamehameha Schools, United States Forest Service and National Park Service are Funders for Kupu. My recommendation is the foregoing agencies, departments and organizations jointly, mutually and collaboratively establish a permanent Base Camp and housing facilities on Maui and fully fund personnel compensation, equipment and operational costs for 3 years for a dedicated Task Force of 155 full-time personnel to: a. Control feral and introduced animals (feral goats, feral pigs, feral dogs, axis deer, and cattle), remove invasive, non- native plants, and increase native plant cover through outplanting and seed scatter; b. Construct fencing consistent and in parallel with above; c. Provide liaison with The Friends of Haleakala and outreach to the residents of Maui County, visitors to the State of Hawaii and Haleakala; d. Provide continued maintenance and conservation under the direction of the Haleakala Park Ranger and the National Park Service.

Topic: Project Implementation Logistics

Comments:

- To implement Concept 1 and to successfully accomplish the mission and goals of Concept 1, recommended is the establishment full-time task force of 155 full-time personnel, a permanent base camp and housing facilities, and funding for personnel compensation, equipment and operational costs for 3 years to accomplish the programmed work.

3 Conclusion

HNP staff was pleased to receive public input on the proposed project and will take all comments included herein into consideration while developing the EA for fencing and conservation work in Nu'u. The input received indicates that people who provided comment, and those that attended the public meetings, generally support the construction of an ungulate control fence in Nu'u and the conservation efforts that the Park Service desires to undertake. The concern that additional acreage on Maui would potentially be designated as off-limits to recreational use, including hunting, due to the construction of the ungulate control fence was identified as an important issue that will be addressed in the EA.

Appendix A. Scoping Documents

The following scoping documents were circulated:

- Public Scoping Newsletter
- Public Scoping Press Release
- Public Scoping Poster
- Agency/Organization Letter [DOFAW Example]



Conservation Work in Nu'u

Project Scoping for the Environmental Assessment

April 17, 2015

The National Park Service (NPS) in partnership with the Leeward Haleakalā Watershed Restoration Partnership (LHWRP) and the National Fish and Wildlife Foundation (NFWF), proposes to protect and restore either 1,300 or 2,100 acres of habitat for native species on the leeward Haleakalā slope. The area would include a large portion of the Nu'u parcel of Haleakalā National Park (HNP), and is targeted at providing additional breeding and nesting habitat for endangered 'ua'u (Hawaiian petrel, *Pterodroma sandwichensis*). Habitat restoration would be accomplished by building an ungulate control fence; conducting feral and introduced animal control; removing invasive, non-native plants; and increasing native plant cover through outplanting and seed scatter.



The 'ua'u is an endangered seabird endemic to Hawai'i, once abundant and widely distributed

throughout the archipelago. Today, the largest known breeding colonies are found at Haleakalā Crater on Maui with other colonies on Mauna Loa, Hawai'i

Island, Kaua'i and on the summit of Lāna'i. Current threats to 'ua'u include habitat loss, predation by introduced mammals, groundings, and collision with man-made objects. The NPS has been working to restore 'ua'u populations by protecting their breeding habitats via feral ungulate exclusion and controlling predators within HNP since the 1970s. These management activities, combined with minimizing human disturbance and habitat restoration, have resulted in significant increases of reproductive success and survival of 'ua'u in the park.

The 4,178 acre Nu'u parcel of HNP was acquired by the NPS in 2008. Land degradation and loss of habitat caused by previous cattle grazing and the continued presence of feral goats, feral pigs, and axis deer are primary concerns for the area. Currently, ungulates trample landscapes and consume vegetation. Feral dogs, which may be attracted to feral ungulates as prey, are known to be present in the area. Feral dogs also prey on 'ua'u adults and nests, and are a safety hazard. With a recent grant from the NFWF and other funds from the NPS, HNP and LHWRP have the opportunity to restore the area and protect additional 'ua'u habitat.

The NPS is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) to provide a decision-making framework that explores a reasonable range of alternatives to meet project objectives, evaluates potential issues and

impacts to park resources and values, and identifies mitigation measures to lessen the degree or extent of these impacts.

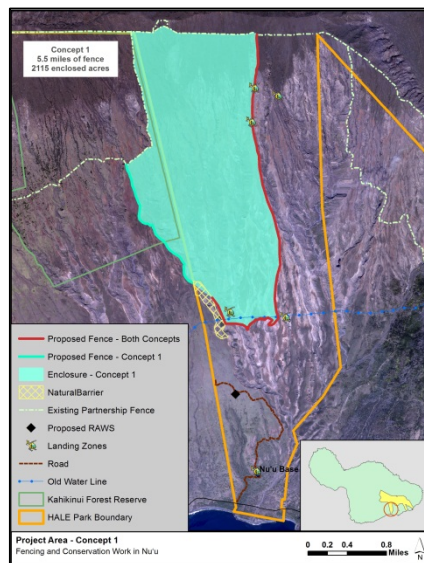
The NPS encourages public participation during the NEPA process. The public has two opportunities to formally participate: during this initial public scoping period for development of the alternatives and during future public review of the EA. At this time we invite you to help identify concerns and to express any ideas or comments regarding fencing and conservation work in the Nu'u parcel of HNP. These comments will be considered during preparation of the EA.

Concepts Being Evaluated

Two different fence line configurations, along with a no action option, are currently being evaluated.

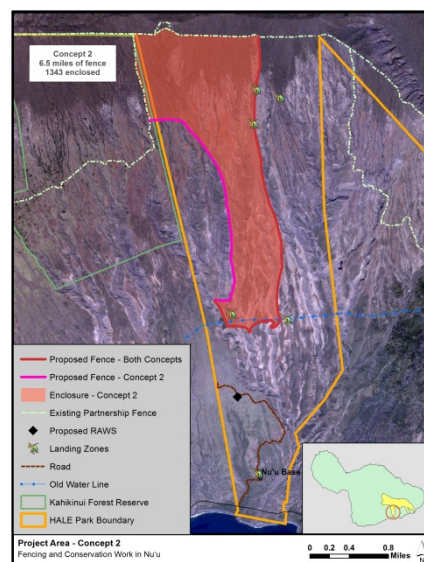
Concept 1: Fencing and Conservation Activities in Nu'u Parcel and a Portion of the Adjoining State Property. This alternative consists of: installation of just over 5.5 miles of ungulate control fence to enclose 2,115 acres; infrastructure improvements to support project activities; removal of feral and introduced animal species and invasive, non-native plants; and habitat restoration activities. The fence line will run between approximately 1,250 ft and 7,650 ft elevation and connect to existing NPS and State fences on both ends. A natural barrier (cliff) would be used.

Other infrastructure work would include: improvements to the existing dirt road; minimal improvements to existing helicopter LZ; installation and removal of temporary shelters; improvements to and installation of water catchment systems; installation of a pit



toilet; and installation of a RAWS.

Concept 2: Fencing and Conservation Activities in Nu'u Parcel. This alternative consists of installation of just over 6.5 miles of ungulate control fence to enclose 1,343 acres. Infrastructure improvements to support project activities and conservation actions would be the same as listed in Concept A.



No Action. The NPS maintains the status quo, which means no fencing would be installed and none of the supporting infrastructure improvements or conservation work occur. Minimal site maintenance would be conducted, as needed. Currently, the park conducts minimal management in the area.

Resources and Concerns

The EA will analyze potential impacts to: Vegetation • Wildlife • Habitat • Special Status Species • Critical Habitat • Geologic Resources and Soils • Water Resources • Wildland Fire • Air Quality • Soundscape • Cultural and Historic Resources • Safety • Transportation • Park Operations • Visitor Use and Recreational Resources • Cumulative Effects

Overview of the Process

- Public scoping (closes May 17, 2015)
- Preparation of EA
- Public review of EA
- Analysis of public comment
- Preparation of decision document
- Announcement of decision

Ideas to Consider

1. Do you have any ideas to share about issues/concerns, or are there any other issues/concerns about the project that should be considered?
2. Are there any other options that you think should be considered?
3. Do you have other comments and suggestions for us to consider in the EA?

Public Meetings

HNP will hold two open meetings to allow for discussion with and comment by the public. The meetings will be an open house format with displays to inform about the proposed project and staff on hand to answer questions and receive comments. The meetings will be held:

Wednesday, May 13, 2015, Kula Community Center, Kula, Maui: 5:30 pm - 7:00 pm
Thursday, May 14, 2015, Hana High and Elementary School Cafeteria, Hana, Maui: 5:30 pm - 7:00 pm

How to Comment

You may find more information online at the NPS Planning, Environmental, and Public Comment website: <https://parkplanning.nps.gov/projectHome.cfm?projectId=55701>

Or on the HNP website: www.nps.gov/hale

Comments may be submitted:

- Online at the NPS Planning, Environmental, and Public Comment website;
- Email to: HALE_Superintendent@nps.gov with the subject line "Nu'u Public Scoping",
- Mail:
Superintendent
Attention: Nu'u Public Scoping EA
Haleakalā National Park
P.O. Box 369
Makawao, HI 96768

Please provide all comments by close of business May 17, 2015

Contact Information: Cathleen Bailey (cathleen_bailey@nps.gov)

Comments will not be accepted by FAX or in any manner other than the methods specified. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including a personal address, phone number, email address, or other personal identifying information in written comments, anyone providing written comment should be aware their entire comment - including their personal identifying information - may be made publicly available at any time. While anyone wishing to comment may ask the National Park Service in their comment to withhold their personal identifying information from public review, the National Park Service cannot guarantee it will be able to do so.

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National Park Service
U.S. Department of the Interior

Haleakalā National Park

Post Office Box 369
Makawao, HI 96768

808 572-4400 phone

Haleakalā National Park News Release

Release date: Immediate
Contact(s): Cathleen Bailey
Phone number: 808-264-0516
Date: April 17, 2015

HALEAKALĀ NATIONAL PARK ANNOUNCES PUBLIC SCOPING PERIOD FOR AN ENVIRONMENTAL ASSESSMENT

The public is invited to participate in a public scoping period and public meetings for proposed conservation work.

The National Park Service, in partnership with the Leeward Haleakalā Watershed Restoration Partnership and the National Fish and Wildlife Foundation, proposes to protect and restore either 1,300 or 2,100 acres of habitat for native species in the upper elevations of Nu‘u on the leeward slope of Haleakalā.

The park is starting to prepare an Environmental Assessment (EA) and welcomes public participation during the environmental analysis process. The public will have two opportunities to formally participate: during this initial public scoping period and during future public review of the EA.

More information and comment card form may be viewed at the park’s website www.nps.gov/hale.

Comments can be also submitted online to

<https://parkplanning.nps.gov/projectHome.cfm?projectId=5570>, by email (to HALE_Superintendent@nps.gov with the subject line “Nu‘u Public Scoping”), or by regular mail (Attention: Nu‘u Public Scoping, Haleakalā NP, P.O. Box 369, Makawao, HI, 96758). All comments must be received by close of business May 17, 2015.

Comments will not be accepted by FAX or in any manner other than the methods specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including a personal address, phone number, email address, or other personal identifying information in written comments, anyone providing written comment should be aware their entire comment - including their personal identifying information - may be made publicly available at any time. While anyone wishing to comment may ask the National Park Service in their comment to withhold their personal identifying information from public review, the National Park Service cannot guarantee it will be able to do so.

The public is also invited participate in meetings. Wednesday, May 13, 2015, Kula Community Center, 5:30 p.m. - 7:00 p.m.; and Thursday, May 14, 2015, Hana High and Elementary School Cafeteria, 5:30 p.m. – 7:00 p.m.

---NPS---

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Fencing and Conservation Work in Nu'u

April 2015 - May 2015

Project Scoping for the Environmental Assessment

The National Park Service (NPS) in partnership with the Leeward Haleakalā Watershed Restoration Partnership (LHWRP) and the National Fish and Wildlife Foundation (NFWF), proposes to protect and restore either 1,300 or 2,100 acres of habitat for native species on the leeward slope of Haleakalā.

The area would include a large portion of the Nu'u parcel of Haleakalā National Park (HNP), and is targeted at providing additional breeding and nesting habitat for endangered 'ua'u (Hawaiian petrel, *Pterodroma sandwichensis*). Land degradation and loss of habitat caused by previous cattle grazing and the presence of feral goats, feral pigs, and axis deer are primary concerns for the area.

Habitat Restoration

- Build ungulate control fence
- Conduct feral and introduced animal control efforts
- Remove invasive, non-native plants
- Increase native plant cover through outplanting and seed scatter



Photo: Jim Denny

The 'ua'u is an endangered seabird endemic to Hawai'i, once abundant and widely distributed throughout the archipelago. Today, the largest known breeding colonies are found at Haleakalā Crater on Maui. The NPS has been successfully working to restore 'ua'u populations by protecting their breeding

habitats via feral ungulate exclusion and controlling predators within HNP since the 1970s.

Fence Line and Conservation Action Options

The NPS will prepare an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) to provide a decision-making framework that explores a reasonable range of alternatives to meet project objectives, evaluates potential issues and impacts to park resources and values, and identifies mitigation measures to lessen the degree or extent of these impacts. Two different fence line configurations, along with a no action option, are currently being evaluated.

Concept A: Fencing and Conservation Activities in Nu'u Parcel and a Portion of the Adjoining State Property

- Install just over 5.5 miles of ungulate control fence to enclose 2,115 acres.
- Fence line will run between approximately 1,250 ft and 7,650 ft elevation and connect to existing NPS and State fences on both ends. A natural barrier (cliff) would be used.
- Improve infrastructure to support project activities.
 - Improvements to the existing dirt road; minimal improvements to existing helicopter LZ; installation and removal of temporary shelters; improvements to and installation of water catchment systems; installation of a pit toilet; and installation of a weather station.
- Remove feral and introduced animal species and invasive, non-native plants.
- Conduct habitat restoration activities

Concept B: Fencing and Conservation Activities in Nu'u Parcel

- Install just over 6.5 miles of ungulate control fence to enclose 1,343 acres.
- Infrastructure improvements to support project activities and conservation actions would be the same as listed in Concept A.

No Action

- Maintain status quo. No fencing would be installed. None of the supporting infrastructure improvements or conservation work occur.
- Minimal site maintenance would be conducted, as needed.
- The park currently conducts minimal management in the area.

Ungulate Control Fencing Works

Adverse impacts from feral and introduced ungulates on native plant and wildlife species, as well as habitat in general, is well documented in Hawai'i and has resulted in extensive biodiversity loss.

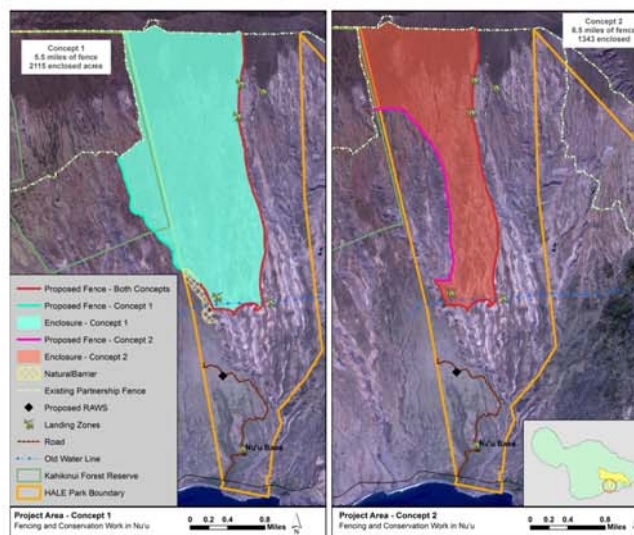
Ungulate control fences have proven to be successful in limiting movement of feral ungulates into protected areas and as a result, habitat conditions have improved naturally, and restoration efforts are more successful.

For over ten years organizations and agencies have been working cooperatively to improve habitat conditions on the slope of leeward Haleakalā. The proposed project would add ungulate control fencing to an area where it already exists on adjacent properties further reducing habitat fragmentation.



Photo: NPS

Project Location



Resources and Concerns

The EA will analyze potential impacts to:

- Vegetation • Wildlife • Habitat • Special Status Species • Critical Habitat •
- Geologic Resources and Soils • Water Resources • Wildland Fire • Air Quality •
- Soundscape • Cultural and Historic Resources • Safety • Transportation • Park Operations • Visitor Use and Recreational Resources • Cumulative Effects



How to Submit Comments

NPS encourages public participation during the NEPA process. At this time we invite you to help identify concerns and to express any ideas or comments regarding fencing and conservation work in Nu'u. These comments will be considered during preparation of the EA.

Public Meetings for Scoping

May 13, 2015: Kula Community Center: 5:30 pm - 7:00 pm
May 14, 2015: Hana High & Elementary School Cafeteria: 5:30 pm - 7:00 pm

You may find more information online at the NPS Planning, Environmental, and Public Comment website:

<https://parkplanning.nps.gov/projectHome.cfm?projectId=55701>

Or on the HNP website: www.nps.gov/hale

Comments may be submitted online at the NPS Planning, Environmental, and Public Comment website, via email to: HALE_Superintendent@nps.gov with the subject line "Nu'u Public Scoping", or by regular mail:

Attention: Nu'u Public Scoping EA
Haleakalā National Park
P.O. Box 369
Makawao, HI 96768

Comments must be received by close of business May 17, 2015

Contact Information: Cathleen Bailey (cathleen_bailey@nps.gov)

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United States Department of the Interior

NATIONAL PARK SERVICE
Haleakalā National Park
P.O. Box 369
Makawao, Maui, Hawai'i 96768



A4415 (HALE)

April 17, 2015

Scott Fretz
Hawai'i Department of Land and Natural Resources
Division of Forestry and Wildlife - Maui District Office
54 South High St
Wailuku, HI 96793

Subject: Proposed Conservation Work in Nu'u on the Leeward Slope of Haleakalā.

Aloha:

The National Park Service (NPS) is preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to conduct conservation work to protect and restore habitat for native species on the leeward slope of Haleakalā. The area would include a large portion of the Nu'u parcel of Haleakalā National Park (HNP), and is targeted at providing additional breeding and nesting habitat for endangered 'ua'u (Hawaiian petrel, *Pterodroma sandwichensis*).

The 4,178 acre Nu'u parcel of HNP was acquired by NPS in 2008. Land degradation and loss of habitat caused by previous cattle grazing and the continued presence of feral goats (*Capra hircus*), feral pigs (*Sus scrofa*), and axis deer (*Axis axis*) are primary concerns for the area. Currently, ungulates trample landscapes and consume vegetation. Feral dogs (*Canis lupis familiaris*), which may be attracted to feral ungulates as prey, are known to be present in the area. Feral dogs also prey on 'ua'u adults and nests, and are a safety hazard. With a recent grant of \$518,000 from the National Fish and Wildlife Foundation (NFWF) and other funds from the NPS, HNP and the Leeward Haleakalā Watershed Restoration Partnership (LHWRP) have an opportunity to restore the area and protect additional 'ua'u habitat.

Habitat restoration would be accomplished by building an ungulate control fence, conducting feral and introduced animal control efforts, removing invasive, non-native plants and increasing native plant cover through outplanting and seed scatter. The fence installation is proposed to keep feral and introduced animals out of known 'ua'u habitat and to facilitate habitat restoration within the enclosure. Infrastructure improvements associated with the project include: minimal improvements to the existing dirt road; minimal improvements to existing helicopter landing zones (LZ); installation and removal of temporary shelters; improvements to and installation of water catchment systems; installation of a pit toilet; and installation of a remote automated weather station (RAWS). These infrastructure

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The National Park Service cares for special places saved by the American people so that all may experience our heritage.

improvements are necessary to support the installation and maintenance of the ungulate control fence, animal removal, native plant restoration efforts, and monitoring activities.

Two different fence line configurations, along with a no action option, are currently being evaluated.

Concept A (attached): Fencing and Conservation Activities in Nu'u Parcel and a Portion of the Adjoining State Property. This alternative consists of: installation of just over 5.5 miles of ungulate control fence to enclose 2,115 acres; infrastructure improvements to support project activities; removal of feral and introduced animal species and invasive, non-native plants; and habitat restoration activities. The fence line will run between approximately 1,250 ft and 7,650 ft elevation and connect to existing NPS and State fences on both ends. A natural barrier (cliff) would be used. Other infrastructure work would include: improvements to the existing dirt road; minimal improvements to existing helicopter LZ; installation and removal of temporary shelters; improvements to and installation of water catchment systems; installation of a pit toilet; and installation of a RAWS.

Concept B (attached): Fencing and Conservation Activities in Nu'u Parcel. This alternative consists of: installation of just over 6.5 miles of ungulate control fence to enclose 1,343 acres. Infrastructure improvements to support project activities and conservation actions would be the same as listed in Concept A.

No Action: The NPS maintains the status quo, which means no fencing would be installed and none of the supporting infrastructure improvements or conservation work would occur. Minimal site maintenance would be conducted, as needed. Currently, the park conducts minimal management activities in the area.

Issues that will be analyzed in depth in the EA include the project's effect on vegetation, wildlife, habitat, special status species, critical habitat, geologic resources and soils, water resources, wildland fire, air quality, soundscape, cultural and historic resources, safety, transportation, park operations, visitor use and recreational resources, any cumulative effects, and potentially any other effects identified during the upcoming public and agency scoping process.

As part of the process for determining the scope of issues to be addressed in the EA and for identifying important issues related to the proposed conservation actions we request input on the following:

- Identification of options or issues not listed that should be addressed in the Environmental Assessment.
- Solicitation of any further information or concerns that you may have regarding this proposed action.

We acknowledge your previous input into projects related to conservation and protection of the native habitats and species of the Hawaiian Islands and specifically the leeward Haleakalā area. We hope you will take the opportunity to participate in this initial scoping period. Public meetings will be held from 5:30 pm to 7:00 pm on May 13, 2015 at Kula Community Center and on May 14, 2015 at Hana High and Elementary School Cafeteria. We look forward to your comments concerning the issues related to this project. If you have any questions or require additional information please contact Cathleen Bailey (Supervisory Wildlife Biologist) at (808) 572-4491 (telephone) or cathleen_bailey@nps.gov (email). Thank you in advance for your assistance.

You may find more information online at the NPS Planning, Environmental, and Public Comment website: <https://parkplanning.nps.gov/projectHome.cfm?projectId=55701>

Or on the HNP website: www.nps.gov/hale

Comments may be submitted online at the NPS Planning, Environmental, and Public Comment website, or via email to: HALE_Superintendent@nps.gov with the subject line "Nu'u Public Scoping".

Or by regular mail:

Attention: Nu'u Public Scoping EA

Haleakalā National Park

P.O. Box 369

Makawao, HI 96768

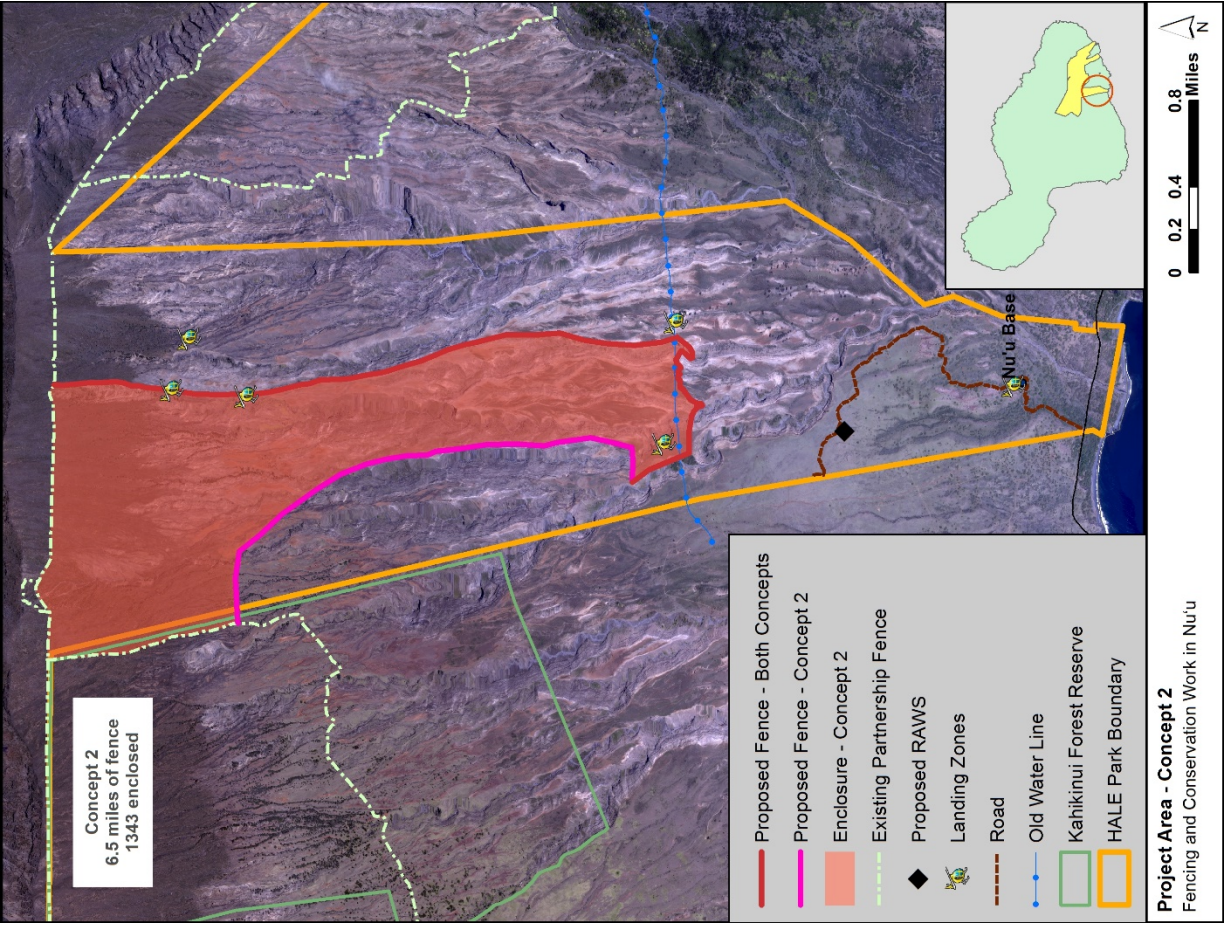
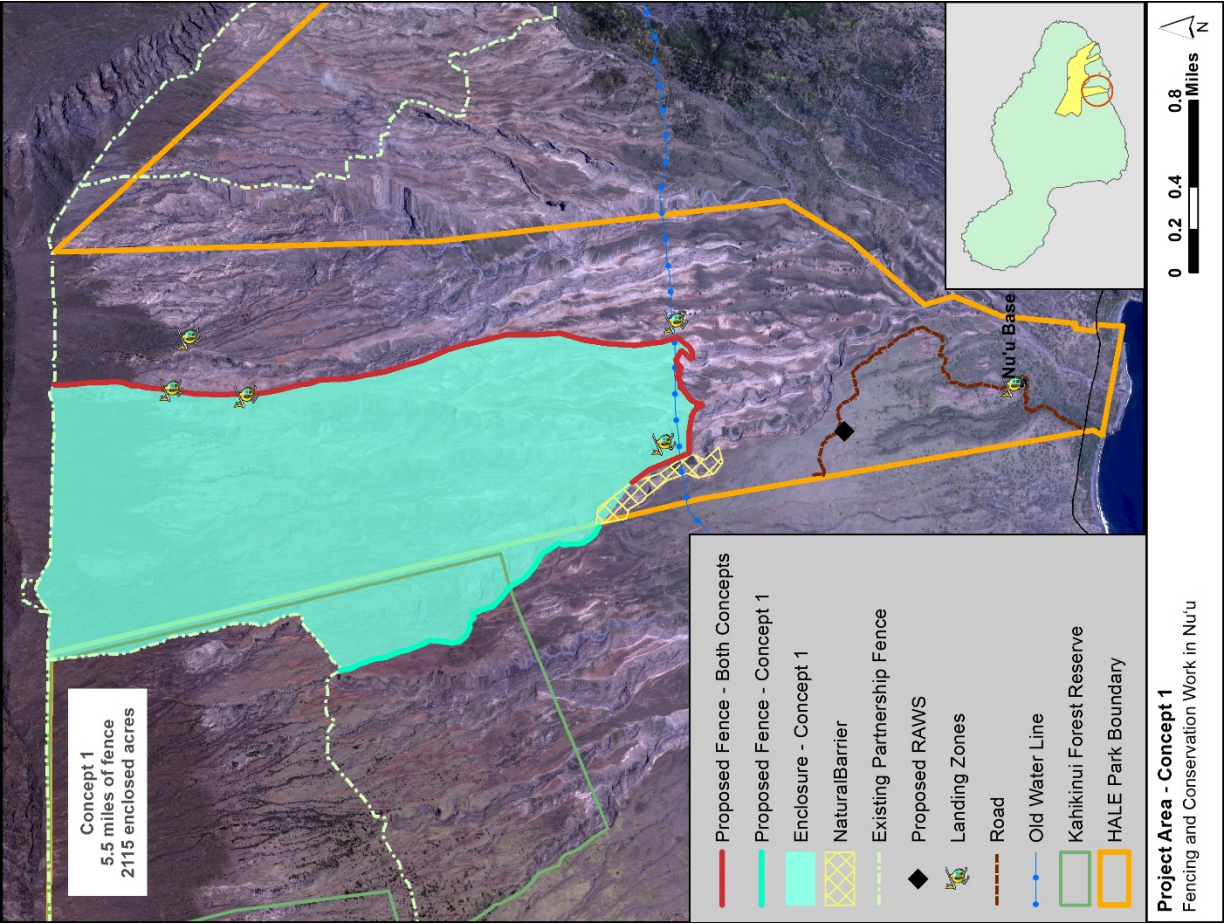
Please provide all comments by close of business on May 17, 2015.

Comments will not be accepted by FAX or in any manner other than the methods specified. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including a personal address, phone number, email address, or other personal identifying information in written comments, anyone providing written comment should be aware their entire comment - including their personal identifying information - may be made publicly available at any time. While anyone wishing to comment may ask the National Park Service in their comment to withhold their personal identifying information from public review, the National Park Service cannot guarantee it will be able to do so.

Sincerely,

A handwritten signature in dark ink, appearing to read "Natalie B. Gates". The signature is fluid and cursive, with the first name being the most prominent.

Natalie B. Gates
Superintendent



Appendix B. Agencies and Organizations Contacted

The following agencies and organizations were contacted via letters during the scoping process:

Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife
Hawai'i Department of Land and Natural Resources, Land Division
Hawaiian Homes Commission, Department of Hawaiian Home Lands, Land Management Division
Aha Moku O Maui
Diamond B Ranch
Friends of Haleakalā
Haleakalā Ranch
Hawaiian Islands Land Trust
Kaupo ranch
Kipahulu Ohana
Leeward Haleakalā Watershed Restoration Partnership
Maui County Council
Maui County Environmental Program
Mayor's Office, Mayor Arakawa
Maui Invasive Species Committee
Maui Nui Seabird Recovery Project
Nu'u Mauka Ranch LLC
Ulupalakua Ranch Inc.

In addition, the U.S Fish and Wildlife Service was sent similar correspondence to solicit input and with the added purpose to "Initiate Formal Consultation under Section 7 of the Endangered Species Act for Proposed Conservation Work for Proposed Conservation Work on the Leeward Slope of Haleakalā". The Hawai'i State Historic Preservation Office was sent similar correspondence to solicit input and with the added purpose to "Initiate Formal Consultation under Section 106 of the National Historic Preservation Act for Proposed Conservation Work in Nu'u on the Leeward Slope of Haleakalā".

Appendix C. Public Meeting Sign In Sheets

Nu'u Public Scoping Meeting
Kula Community Center 5/13/15

Name	Affiliation (if any)	Address email	Phone
Aholauni Smith	AMOK	P.O. Box 1269, Kula	970-2820
Alika Smith	AMOK	"	870-2816
Jim Crowe		30 Alanui Pl. Kula mevicrowe@gmail.com	876-1975
Colleen Medeiros	N/A	medeiros@hotmail.com	283-3131
Scott Fisher	HILT	scottahill.org	357-7751
Matt Wardman	Friends c/Habitat	matt@fhnp.org	
Linda Clark		clarklinda@gmail.com	268-9844
Gaylene Clark			870-0088
Yukitei Sugimura	Senator Mazie Hirono	yukitei-sugimura@hirono.senate.gov	870-8647
Ron Bishop			
Bruce Faulkner	CITIZEN		
Russell Reinertsen	Citizen	Russell@M.sadventuregear.com	283-0748
Helen Nielsen	Kaupo	1942 Main St Ste 104 Wailuku 96793 oluolu@maui.net	

Nuu Public Scoping Meeting

Hana School: 5/14/15

Name	Affiliation (if any)	Address	Phone
Rose K Soon		PO. Box 607 Hana, HI	

Appendix D. Comments Received

Commenter: Jay Penniman (Project Manager)

Organization: Maui Nui Seabird Recovery Project

Comment Text: This letter is in support of concept 1, 5.5 miles of fence enclosing 2115 acres.

This project would be a valuable addition to the restoration of the native flora and fauna of the leeward slope of Haleakala. The potential for restoring these lands can easily be seen by looking at the effect of previous National Park fencing and the contrast to unfenced lands adjacent. Vegetation returns and native species such as the 'Ua'u, 'A'o and 'Ake 'Ake have enhanced potential for recovery.

The lands proposed for fencing are not good hunting areas due to their remote and extremely steep character. Public access, even if it were accommodated with trails would be of minimal value due to the rugged nature of the terrain. The National Park and the state budgets for trails are not adequate to keep the current inventory of trails in prime condition. Burdening these agencies with additional trails in marginal areas for minimal public use is not good use of tax dollars.

The highest use of these lands, in my opinion, is for the restoration of the native vegetation community and the native fauna which once thrived there. Concept 1 is the best option for achieving this result.

Commenter: Scott Fisher Ph.D (Director of Conservation)

Organization: Hawaiian Islands Land Trust

Comment Text: The Proposed fencing of the NPS area of Nu'u ahupua'a is an excellent idea and will result in long term success of the 'ua'u. The more area included, the better. Please act as quickly as reasonably possible.

Commenter: Matt Worderman

Organization: Friends of Haleakalā National Park

Comment Text: The Friends of Haleakala supports the proposed conservation work on the Leeward Haleakala Slope including the Nu'u Parcel. We would encourage the NPS, in the planning and assessment processes to consider the positive impact that such conservation will have on all native plants and animals in addition to the ua'u. We also encourage the NPS to consider and evaluate options that would protect the largest feasible area focusing on the upper elevations. We also encourage the NPS to consider and evaluate what impact such conservation work may have on any future recreational use of the Nu'u parcel. We encourage the NPS, as part of its evaluation and planning process to determine if there are ways to use community volunteer resources to help remove invasive plants and animals and re-plant natives in such a way that this can be done safely and productively.

Commenter: Jade Alohalani Smith

Organization: Aha Moku O Kaupo

Comment Text:

Aloha Haleakala National Park,

My name is Jade Alohalani Smith and I am the Aha Moku O Kaupo Representative. Thank you for the opportunity to meet with you folks and assisting us in better understanding the Project Scoping for the Environmental Assessment in Nu'u, Kaupo.

I do understand the particular work that lies ahead for this project and that it will be a major process to protect, restore and preserve this habitat for active species on the leeward Haleakala slope. Thank you.

We are available for consultation, a possible partnership and could assist in protecting and preserving this area and project.

We are concerned with the bottom section and the possible visitors traffic that will impact our community. Please keep us informed in this future process.

I would also like to invite you and anyone else from the Park to attend our Aha Moku O Kaupo Meeting this Saturday, May 16, 2015 at 2:00 pm at the location of Mile Marker 33 (33275 Piilani Highway). There will be a "Kaupo" banner at the entrance. I could send an Agenda on your request. We will be assisting the Hawaiian Island Land Trust on the Makai Nu'u property in building a code of conduct from the Community. Please feel free to join us or contact me at 808-870-2820.

Commenter: Colleen Medeiros

Organization: Private Citizen

Comment Text: I strongly support all efforts to provide additional breeding and nesting habitat for the 'ua'u.

Commenter: Rose K. Soon

Organization: Private Citizen

Comment Text: Ms. Soon was born and raised in Kaupo and her parents owned the Kaupo Store. She 'talked story' with the NPS and SRGII staff about her history, and learned more about the proposed project. Her main concern was that she does not want to see any increased use of or development in the area because so much has already changed.

Commenter: Russell Reivertson

Organization: Private Citizen

Comment Text: While I understand the value of fencing and ungulate removal in protecting endangered species, I am concerned about the loss of 230 acres of public hunting land (Kahikinui Forest Reserve) in the proposed Concept 1. Currently Kahikinui Forest Reserve (the adjoining State parcel) has no meaningful public access because surrounding land owners, including the NPS, has refused to grant easements for access. Members of the public have been encouraging the State of Hawaii to open access to this unique alpine area. A large portion of Kahikinui Forest Reserve was recently fenced off to create the Nakula Natural Area Reserve. The NARS Program has a history of fencing off land parcels and prohibiting public access. The Nakula NAR was created despite strong public opposition. To see the NPS propose taking control of another portion of the already diminished public forest is painful to see. Of the 3 proposals, I would prefer the second concept where the proposed fence remains entirely NPS land. I would also like to see some system set up where public hunters are allowed to assist in removing ungulates, or the meat is recovered and distributed to the public after eradication operations.

Commenter: Helen Nielsen

Organization: Private Citizen

Comment Text: Thank you for beginning public input on the proposed work at Nu'u.

Thank you for providing scarce public resources towards fencing at Nu'u.

I hope to attend one of your two meetings in May, if my schedule allows, as I am in full support of the Park's proposed efforts.

Commenter: Clifton Hasegawa

Organization: Private Citizen

Comment Text: Dear Superintendent,

Please find attached my comments to the planned expansion of the conservation area on Haleakala.

The expansion of the conservation area to 2,115 acres, Concept 1, is recommended.

To implement Concept 1 and to successfully accomplish the mission and goals of Concept 1, recommended is the establishment full-time task force of 155 full-time personnel, a permanent base camp and housing facilities, and funding for personnel compensation, equipment and operational costs for 3 years to accomplish the programmed work.

Collaboration with the State of Hawaii, your Federal Partners and private sector organizations will provide the infrastructure and funding to achieve effectively, efficiently and successfully the preservation, protection, maintenance and restoral of the natural habitat and protected species on Haleakala.

Thank you very much.

Respectfully,

Electronically Signed

Clifton M. Hasegawa

PROPOSED CONSERVATION WORK ON THE LEEWARD HALEAKALĀ SLOPE INCLUDING THE NU`U PARCEL AT HALEAKALĀ NATIONAL PARK

COMMENT FORM

COUNTRY: United States of America
NAME: Clifton M. Hasegawa
ORGANIZATION: Clifton M. Hasegawa & Associates, LLC
ADDRESS: 1044 Kilani Avenue 12, Wahiawa, Hawaii 96786-2243
EMAIL: clifhasegawa@gmail.com

HOW DID YOU HEAR ABOUT THIS PROJECT?

The Friends of Haleakala

HOW WOULD YOU LIKE TO HEAR ABOUT NPS DOCUMENTS IN THE FUTURE?

Email – clifhasegawa@gmail.com

COMMENTS ON PROPOSED CONSERVATION WORK ON THE LEEWARD HALEAKALĀ SLOPE INCLUDING THE NU`U PARCEL AT HALEAKALĀ NATIONAL PARK:

Implementation of CONCEPT 1, expansion of the conservation area to include 2,112 acres, the establishment of a full-time dedicated Task Force, and full funding for operational costs are recommended.

Fencing

“The value of fencing for conservation is dependent on the benefits of separating biodiversity from threatening processes outweighing the ecological, financial and social costs of having a fence”,

The fundamental benefit of conservation fencing is that it separates biodiversity from threats to its existence and, hence, is critical to conservation actions, yet fencing for conservation also has some clear costs (Hayward and Kerley 2009).

Fences have a high financial cost, as well as ecological costs such as inhibiting movement patterns, isolation, inbreeding, predation sinks, continuing management, visual costs and ethical issues (Hayward and Kerley 2009).

[M]etaphorical fencing, without any conservation goals, can act the same way as a physical structure.

Source: Hayward, M. W. (2012). Perspectives on Fencing for Conservation Based on Four Case Studies: Marsupial Conservation in Australian Forests; Bushmeat Hunting in South Africa; Large Predator Reintroduction in South Africa; and Large Mammal Conservation in Poland. In *Fencing for Conservation* (pp. 7-20). Springer New York.

Fencing without an aggressive program to control feral and introduced animals (feral goats, feral pigs, feral dogs, axis deer, and cattle), remove invasive, non- native plants, increasing native plant cover through outplanting and seed scatter is counterproductive, ineffectual and wasteful of time and economic resources.

Recommendations

1. Control feral and introduced animals (feral goats, feral pigs, feral dogs, axis deer, and cattle), remove invasive, non- native plants, increasing native plant cover through outplanting and seed scatter.

The programs now in place have made a contribution towards restoral of the critical habitat. The overall impact and success of these programs are measured.

The Civilian Conservation Corps (CCC) established on Apr 10, 1933 by President Franklin Delano Roosevelt. “[T]his type of work is of definite, practical value, not only through the prevention of great present financial loss, but also as a means of creating future national wealth.” This program was not terminated. On July 1, 1942 the United States House of Representatives and the United States Senate approved funding to shutter the remaining CCC Camps and to redistribute the equipment and resources of the CCC. The restoration of a program akin to the CCC by the United States House of Representatives and the United States Senate today is problematic and doubtful.

LASTING EFFECTS OF THE CCC

Civilian Conservation Corps In Hawai'i: Oral Histories of the Haleakalā Camp, Maui. Prepared for Haleakala National Park. NPS Contract #C8298090010. Final Report – July 20, 2011. By: Kathryn Ladoulis Urban and Stanley Solamillo. K Design Group, 4348 Waialae Avenue # 305, Honolulu, Hawai'i 96816. Web: <http://www.nps.gov/hale/learn/historyculture/upload/CCC-Oral-Histories-of-Haleakala-Camp.pdf>

The CCC program at Haleakalā produced buildings, trails, and structures from 1934 to 1941 that still remain. Oliveira summed up his experience in 1983:

[W]hen we left the cabins was all complete. The trails was all complete. You look right from the Rangers' cabin going across to the other cabin, there's a little bridge, and you cross that little bridge, that stream there, I built that (Oliveira 1983 Transcript: 13).

Although Haleakalā CCC camp units are not mentioned separately, in one article written by the Acting Territorial Forester L.W. Bryan in 1938, credit is given to HNP-1 CCC boys for the outstanding work improving trails and roads within the Hawai'i National Park:

The ease with which it is now possible to ascend...has been made possible by the road and trail building activities of the CCC Boys and much credit is due this organization... (Tillett, Everett Edward, *Paradise of the Pacific*, 1 March 1938: 50: 3: 38).

Forester Bryan explained that the increase in thousands of visitors to the Park in the previous two years was the result of their [CCC] efforts (Ibid.).

As a result of the CCC program, enrollees were provided with opportunities to acquire apprenticeship training in agriculture and horse care, as well as credentials including certifications as truck drivers, chefs, and carpenters. This was in addition to life skills and world views that appear to have been carried throughout their lives.

HNP-1 Haleakalā Camp Closed

The Haleakalā CCC camp officially closed at the end of business on May 13, 1941 (Pesonen, Volume 1: May Monthly Report 1941). As reported in the *TH-CCC News*, "May 13, was the last day for the Haleakalā Side Camp and the 26 men who made it their home left the 'land above the clouds' and took the boat from Lāhainā for Hilo with Samuel Milne, their foreman" (*TH-CCC News*, June 1941: 6).

These enrollees were assisted by Acting Camp Director Rennie and were transferred to the Kīlauea CCC camp on the Big Island (Ibid.). Mules, pack horses, and a station wagon remained on Maui and were reassigned while the Ford V8 truck, and beds from the CCC camps went with the men to Kīlauea (Wingate, Superintendent's Narrative Report, 12 October 1935: 3).

2. Service and Conservation Corps (SCA) are a direct descendent of the Civilian Conservation Corps (CCC).

The Hawaii Conservation Corps, Kupu is a member of SCA. Kupu serves the islands of Kauai, Oahu, Molokai, Lanai, Maui and Hawaii Island and is based out of Honolulu, Hawaii. The mission of Kupu,

To empower youth to serve their communities through character-building, service-learning, and environmental stewardship opportunities that encourage integrity (pono) with God (Ke Akua), self and others.

Source: Kupu. <http://kupuhawaii.org/>

3. The State of Hawaii, Department of Land and Natural Resources; State of Hawaii, Department of Health; NOAA; United States, Environmental Protection Agency; Kamehameha Schools, United States Forest Service and National Park Service are Funders for Kupu.

My recommendation is the foregoing agencies, departments and organizations jointly, mutually and collaboratively establish a permanent Base Camp and housing facilities on Maui and fully fund personnel compensation, equipment and operational costs for 3 years for a dedicated Task Force of 155 full-time personnel to:

- a. Control feral and introduced animals (feral goats, feral pigs, feral dogs, axis deer, and cattle), remove invasive, non- native plants, and increase native plant cover through outplanting and seed scatter,
- b. Construct fencing consistent and in parallel with paragraph 3a., above,

- c. Provide liaison with The Friends of Haleakala and outreach to the residents of Maui County, visitors to the State of Hawaii and Haleakala,
- d. Provide continued maintenance and conservation under the direction of the Haleakala Park Ranger and the National Park Service.

Our Stewardship of the environment is the oneness of mind, body and spirit in harmony between and within ourselves. Years of human neglect, abuse and omission have created an imbalance and dysfunctional state in the environment, destroyed fragile ecosystems, endangered critical habitats, and diminished thriving life within the ecosystems.

Aggressive action to restore the balance, the harmony of Nature and protected life within the boundaries of the Haleakala conservation areas is needed.

Protracting our internal conflicts, the disposition of feral and introduced animals and elimination of invasive, non- native plants will have long lasting, devastating and irreversible impacts.

The destiny and fate of our environment rests on the decisions we make today.

Respectfully,

A handwritten signature in dark ink, reading "Clifton M. Hasegawa". The signature is written in a cursive, flowing style. The first name "Clifton" is written in a larger, more prominent script, while "M. Hasegawa" follows in a similar but slightly smaller script. The signature is positioned on a light-colored, possibly white, background.