



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240



OCT 30 2014

Mr. Horst Greczmiel  
Associate Director for NEPA Oversight  
Council on Environmental Quality  
722 Jackson Place, N.W.  
Washington, D.C. 20503

**RE:** Department of the Interior, National Park Service Request for Alternative Arrangements for Emergency Access Route along the Lava-Covered Section of Chain of Craters Kalapana Road, Hawai'i

Dear Mr. Greczmiel:

This letter constitutes a request from the Department of the Interior, on behalf of the National Park Service (NPS), to establish alternative arrangements pursuant to 40 C.F.R. § 1506.11 for the proposed Chain of Craters Kalapana Road Project outlined in the attached environmental review.

We are requesting alternative arrangements that provide for immediate publication of the attached environmental review and a decision to proceed with the proposed action. The need for immediate action is based on the current threat that lava flows pose to the community of Pahoa. Lava flows are projected to cover existing access routes and thereby cut off all access to the Lower Puna community as early as this Friday, October 31, 2014.

The environmental review prepared by the NPS, Hawai'i Volcanoes National Park, considers a proposed action to allow access to and from the Lower Puna community by constructing an emergency access route that will connect the existing Chain of Craters Road within the park to existing County roads leading to the community. The emergency access route would be used only until another route is available outside of the park. However, due to the uncertain nature of the lava flow it is possible that the road will be the only access to the community over the long-term.

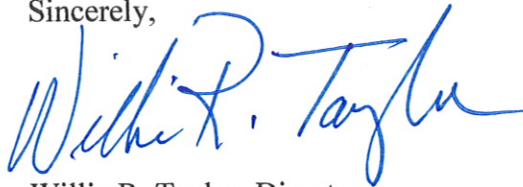
The environmental review considers alternatives to the proposed action, potential adverse impacts, public involvement, and mitigation and monitoring commitments. As part of the alternative arrangements, the NPS will continue to engage with the public and stakeholders by taking public comments on the project, participating in public informational meetings currently held on a weekly basis, providing responses to public comments received, and publishing periodic reports on the results of monitoring commitments. The NPS will also prepare a National Environmental Policy Act review to consider the future of the emergency access route after the emergency ends.

The NPS is meeting its Endangered Species Act Section 7 requirements by consulting with the U.S. Fish and Wildlife Service (FWS) under emergency consultation procedures pursuant to 50 CFR §402.05. Under the first step of the emergency consultation procedures, the NPS consulted with FWS informally and has agreed to a number of minimization and avoidance measures to be implemented as part of the proposed action. Completion of this first step was required before work on a two-lane road could begin. Under the second step of the emergency consultation procedures, the NPS will enter into formal consultation with FWS as soon as practicable, while construction and use of the road begins. The NPS will implement any additional minimization, avoidance, monitoring, or recovery actions that are required as part of the formal consultation process.

The NPS has also invoked the emergency procedures for National Historic Preservation Act Section 106 consultation pursuant to 36 CFR 800.12. On October 29, 2014, letters were mailed to the Advisory Council on Historic Preservation, the Hawai'i State Historic Preservation Division, and Native Hawaiian organizations to notify them of the proposed action and allow for an opportunity to comment. Under the emergency procedures these entities have seven days to submit comments, and after that time period, Section 106 compliance will be complete.

We appreciate your attention to this matter and your assistance in reaching alternative arrangements.

Sincerely,



Willie R. Taylor, Director  
Office of Environmental Policy  
and Compliance

Attachment