



United States Department of the Interior

NATIONAL PARK SERVICE
PACIFIC WEST REGION
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IN REPLY REFER TO:

L7617 (PWRO-P)

FEB 28 2019

Memorandum

To: Superintendent, Haleakala National Park

From: Regional Director, Pacific West Region

Subject: Environmental Compliance for Comprehensive Plan for
Kipahulu Area

The park's much anticipated initiative to improve visitor experiences in Lower Kipahulu Valley, while protecting cultural and natural resources, is approved. To complete this particular environmental compliance effort, at the time when the park announces the schedule for plan implementation, the decision document should be made available to all persons who received or commented on the Environmental Assessment.

Stan Austin

Attachment



National Park Service
U.S. Department of the Interior
Haleakalā National Park

FINDING OF NO SIGNIFICANT IMPACT

Kīpahulu Comprehensive Plan

Haleakalā National Park

BACKGROUND

In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended, the National Park Service (NPS) has completed a comprehensive planning effort for the Kīpahulu District of Haleakalā National Park. The project area for the Kīpahulu Comprehensive Plan/Environmental Assessment (EA) is defined as the Lower Kīpahulu Valley, the portion of the Kīpahulu District that includes current park development and extends from the coast to the terminus of the Pipīwai Trail.

This finding of no significant impact and its associated environmental assessment constitutes the record of the environmental impact analysis and decision-making process. The National Park Service will implement the selected alternative (selected action) to improve visitor access to and enjoyment of the Kīpahulu District while reducing visitor-caused impacts to the park's cultural and natural resources; promote safety; and ensure adequate operational capacity and facilities given the area's remote location. The selected action was selected after careful analysis of resources and visitor impacts, consultation with Native Hawaiian Organizations and park kūpuna groups, and review of public comments.

This document records (1) a finding of no significant impact as required by the National Environmental Policy Act of 1969; (2) a finding of no effect to federally listed species or their habitat as required by the Endangered Species Act, Section 7; and (3) a finding of no adverse effect as required by the National Historic Preservation Act, Section 106; all described by the Director's Order #12 and Handbook (NPS 2015). This finding of no significant impact is available on the National Park Service Planning, Environmental and Public Comment (PEPC) website <http://parkplanning.nps.gov/KCP>.

PURPOSE AND NEED FOR FEDERAL ACTION

The plan was prepared to address the following management issues identified during public and internal scoping. These issues have developed since the park general management plan was approved in 1995:

- Congestion and crowding occur in the visitor center area, parking lots, Pools of 'Ohe'o, in the campground, and on trails, all which affect visitor safety and damage resources. Congestion at the fee station area causes traffic congestion on Hāna Highway (Hawaii State Route 360). Off-road parking and crowding are creating staff and visitor safety concerns. The large volume of visitors is causing resource damage in certain areas (such as trail widening, visitor-created trails, and damage to archeological resources at the campground). The overflow parking lot and unpaved road become impassible during and following heavy rainfall.
- Visitor safety concerns at the Pools of 'Ohe'o include rockfall and flash flooding. Other safety concerns include visitors falling or jumping off rocks into pools along the Pipīwai Stream or being struck by rockfall at Waimoku Falls. While most severe incidents are a result of visitors taking

part in a prohibited activity or being unprepared for their visit, the plan is needed to consider safety messaging and the potential for closing the pools to visitors.

- Opportunities to interpret cultural resources and provide opportunities to learn about Native Hawaiian culture are limited. The George Kewalo Kanalu House has no public access, and the Kapahu Living Farm has limited visitor access. A comprehensive approach to interpretive and stewardship opportunities is needed to effectively share this aspect of the park's significance with visitors.
- Research has shown that visitors perceive a lack of directional and educational signs to be the one of the most significant problems in the Kīpahulu area. The plan is needed to identify improvements to ensure coordinated visitor information and circulation.
- The Kīpahulu District lacks opportunities for visitors with mobility impairments. The primary visitor attraction, the Pools of 'Ohe'o, does not have an accessible viewing route. Trails to other visitor attractions, such as to the *hale* (traditional Hawaiian home) and ocean (at Kūloa Point) are also not accessible. Accessible routes to the pools and ocean have previously been designed and now need to be assessed in the context of the comprehensive facility improvements under evaluation in this plan.
- There are very few designated camping areas in the East Maui area, and demand for camping opportunities is high. Campground use at Kīpahulu has increased over time and presents challenges for park operations and maintenance, such as increased amounts of trash and recycling, litter, and human waste and damage to amenities such as tables and grills. The plan is needed to evaluate campground improvements to enhance visitor use, improve maintenance, and ensure protection of surrounding vegetation and cultural resources.
- Trails experience erosion because of heavy rainfall and trail design. The Kapahu Trail is closed because of issues related to compliance and resource protection. The plan is needed to evaluate the trail system and provide recommendations for trail use, trail alignment, accessibility, overlooks and trail terminus, potential trail connections, and safety elements for visitors (e.g., surfacing, railings, road crossings, etc.).
- Operational facilities were built as temporary structures and do not provide enough office and heavy equipment storage space to serve park operational needs. The fee station lacks shade, air conditioning, office space, and a restroom. The plan is needed to evaluate facilities to adequately support operations and ensure employee safety.
- The park's housing management plan identifies the need for up to three houses in the Kīpahulu District; two for law enforcement staff to improve emergency response capacity, reduce vandalism and other inappropriate activities, and aid in recruiting and retaining law enforcement staff. The remaining housing unit would be provided for a water treatment plant operator.

- There is deferred maintenance on buildings, trails, archeological sites, and maintained landscapes (such as mowed paths) in the Kīpahulu District. The plan is needed to identify financially feasible options to address deferred maintenance and implement new proposed facilities with expected funding.

The Kīpahulu Comprehensive Plan brings together actions for the District that will update the 1995 general management plan guidance for the area. The following general management plan requirements are addressed for the Lower Kīpahulu Valley:

- Indications of types and general intensities of development (including visitor circulation and transportation patterns, systems and modes) associated with public enjoyment and use of the area, including general locations, timing of implementation, and anticipated costs; and
- Identification of and implementation commitments for visitor carrying capacities for all areas of the unit.

The plan also provides guidance on improvements to areas such as the Pools of ‘Ohe‘o, visitor center, trails, campground, and Kapahu Living Farm as well as improvements to supporting NPS operational facilities such as the maintenance area buildings, fee station, staff housing, and staff offices.

SELECTED ALTERNATIVE

Based on the analysis presented in the environmental assessment, the National Park Service has selected alternative 2 as described and analyzed in the EA for implementation. Alternative 2 was identified as the NPS preferred alternative in the EA/AoE. A summary of the selected action is provided in the table below.

Alternative 2 Action	Description
Visitor center expansion	The current visitor center will be expanded by up to 4,800 square feet to accommodate exhibits, sales, a film-viewing area, offices, storage and lanai (outdoor space) for visitor programming. The attached lanai will offer additional sun/rain cover for groups and provide an accessible location for community meetings, outreach, relaxing, and various events. The lanai will reduce the size of the new visitor center as it will allow some functions to occur outside, and a lanai will be less of an impact to the ocean views. Expansion of the visitor center will be made with the goal of minimizing effects to the viewshed. The building's design will incorporate traditional Hawaiian elements such as stone building material, allowing it to be used as an interpretive tool to connect visitors to the area. Accessibility improvements will also be made.
Orientation plaza	An orientation plaza will be created in front of the visitor center adjacent to the comfort station. This approximately 4,000-square-foot area will consist of a designed landscape that will lead visitors to park informational signage, the visitor center, and trailheads. The majority of visitor information and park messaging will be provided through signs in the open-air orientation plaza that will be the hub of the park's developed area. Most park trails will begin at the orientation plaza, encouraging visitors to pass through the area and access safety updates, trail condition notices, and program scheduling.
Fee station expansion	The existing 76-square-foot fee station will remain in or near its current location but will be expanded by approximately 200 square feet to include office space and an employee restroom. Additional security measures, including a camera system and functioning alarms, will be added for employee safety and accountability. An overflow fee station will be constructed to accommodate an additional traffic lane. This will address safety concerns regarding staff directing traffic during periods of high use, cut down on wait times during the peak visitation hours, and reduce the likelihood of traffic spilling on to the highway.

Alternative 2 Action	Description
Oversized-vehicle drop-off expansion	An expanded oversized-vehicle drop-off area will be constructed adjacent to the comfort station near the visitor orientation plaza to accommodate minibuses and commercial tour groups.
Overflow parking lot for approximately 60 vehicles	A designated parking lot that blends into the area's natural surroundings will be created at the current site of the grass overflow parking area. Approximately 20,000 square feet of the overflow lot will be covered with a permeable, natural-looking surface, to formally accommodate approximately 60 vehicles. This lot will also be used for oversized-vehicle parking.
Campground management	<p>The campground campsites will be numbered and formalized with an established limit to camping once all sites are filled. The campground will continue to offer drive-in, walk-in, and group campsites. Visitors will obtain permits for specific sites either prior to their arrival via Recreation.gov, at the fee station, or at the visitor center for a fee. Permit will be available in advance for campers planning trips to the island as well as walk-up reservations for spontaneous campers. Camping will continue to be limited to three nights in a 30-day period for visitors and provide a semi-primitive camping experience for visitors (vault toilets; campers must bring water or obtain drinking water from the visitor center area).</p> <p>Twelve accessible drive-in sites will line the campground loop; each site will include a tent pad, a secured picnic table, a pedestal grill, and designated parking spots. These 600-square-foot, individual, drive-in sites will be numbered and delineated and will be limited to six people per campsite. Additional native and/or culturally appropriate shady vegetation will be planted near the south drive-in sites to improve visitor camping experiences.</p> <p>Seven walk-in sites will be created near the coast by the accessible trailhead. These walk-in sites will be individually numbered. Each site will be approximately 600 square feet and will limited to four people / two tents per site. An angled parking area for walk-in sites will be built (approximately 1,700 square feet) near the vault toilet and information bulletin board.</p> <p>A walk-in group site that could accommodate 25 people will be located in the current location northwest of the drive-in sites and separated from the rest of the campground by native and/or culturally appropriate vegetation. The accessible group site will include five tent pads and a central community space with picnic tables.</p> <p>A volunteer host will manage the campground. The host will be expected to monitor camper behavior and manage permits and sites.</p> <p>A 1,100-square-foot host site with RV electric hook-up will be added to the campground near the overflow parking area where all campers will need to check in on arrival. This location will allow the host to monitor archeological resources near the campground and inform visitors of campground regulations.</p>
Campground program area	The campground will include an approximately 1,250-square-foot, accessible, semi-circular seating area appropriate for ranger chats and safety briefings. This will be located near the formalized walk-in sites and slightly removed from the road. It will consist of secured benches.
Staff/volunteer temporary housing	The 625-square-foot maintenance area bunkhouse will be renovated and continue to serve as temporary housing for staff, volunteers, and researchers. Space for volunteer and employee walk-in camping will be provided east of the bunkhouse in the maintenance baseyard. The area will include five tent pads with a central fire pit and picnic tables.

Alternative 2 Action	Description
Picnic areas	A new, formal picnic area will be added near the parking lot. This approximately 0.25-acre area will include secured picnic tables under shade and will be accessible.
Hiking opportunities	<p>A new 2,100-linear-foot, accessible trail will be created that will link the campground to the ocean overlook. The trail will be constructed as a boardwalk with sustainable materials and minimal slope to allow guests with mobility impairments to move between the campground and the coastal viewing platform. This trail will also connect with the Kahakai Trail to create a loop near the walk-in campsites.</p> <p>A 500-square-foot ocean overlook platform on the accessible boardwalk will act as a destination and terminus for the Kūloa Point Trail. Pedestrian pullouts (approximately 500 square feet each) will be installed along the accessible trail between the campground and viewing platform. These areas will include benches and interpretive waysides that focus on different aspects of Hawaiian culture (customs, history of the land, connections to the sea, archeology), and additional space for interpretation and programming.</p> <p>A 600-square-foot viewing platform for Waimoku falls will be constructed at the Pīpīwai Trail terminus.</p> <p>The Kapahu Trail will be changed to minimize impact to park resources and visitor exposure to hazards and reopened for guided tours. The trail will retain its existing alignment where possible but will be improved in some sections where erosion frequently occurs. Approximately 700 linear feet or 10% of the trail will be realigned as needed. Fencing or other barriers will be installed as needed for resource protection and visitor safety. An additional 500-linear-feet spur trail will be created to connect the Pīpīwai Trail to the Kanalulu House via the lower Kapahu Trail. Mitigation measures will be implemented in consultation with the community to protect archeological resources and partner assets along the Kapahu Trail and reduce erosion.</p>
New arboretum and research lab featuring native and Polynesian plants	<p>The park will construct an enclosed or fenced native plant arboretum composed of five, 2-acre trailside parcels across the highway from the park entrance. The arboretum will act as a research/collaboration space for resource management staff and interested academic programs and local organizations. The arboretum and research lab will allow for additional educational programming related to native plants and STEM (science, technology, engineering, and math) programming for school groups.</p> <p>Visitors will be able to access the arboretum via a new 300-foot trail spur from the Pīpīwai Trail. Scheduled NPS-guided tours of the facility will be available. Interpretive panels will provide information about the program, park resource management, and native plant species for those visiting when a program was not scheduled.</p> <p>The existing resource management nursery located in the maintenance baseyard will be moved near the arboretum. Vehicle access to the arboretum will be from the existing maintenance road. All constructed facilities will be constructed as moveable off site per previous land restrictions and NPS guidance.</p>
Expanded cultural activity areas and opportunities to learn about Native Hawaiian culture	<p>Situated near the junction of the Pīpīwai and Kūloa Point Trails, the Hale Ku'ai will be renamed Hale Hālāwai and re-envisioned as a "meeting place," with additional visitor seating areas, interpretive panels, and scheduled cultural activities. This space could also be used by community groups as open-air meeting space. Vegetation surrounding the Hale Hālāwai will be maintained to promote longevity of the structure. Regular trimming/clearing and routine grounds work will reduce degradation and improve visitor access and usability of the space.</p> <p>Traditional farming techniques will continue as they currently are at the Kapahu Living Farm. The farm will be open for regularly scheduled interpretive and service-learning tours.</p>

Alternative 2 Action	Description
Re-established dryland taro plantings	<p>Dryland taro patches located along the Pipīwai Trail and in the parking lot terracing at the Visitor Center will be maintained and interpreted to allow visitors to more easily and readily learn more about traditional farming practices and the cultural importance of taro.</p> <p>The National Park Service or partners will offer experiential learning programs that will focus on the cultural importance of taro, the mountain-to-sea connections within traditional land divisions, and traditional Hawaiian farming practices, while allowing visitors to partake in farm work.</p>
Interpretation and education	<p>Interpretive and educational programs will be scheduled during peak visitation hours and will take place in the centrally located orientation plaza.</p> <p>The Kanalulu House will become an interpretive site. Visitors will have access to the exterior of the house. Interpretive waysides will explain its significance, the Kanalulu family's ties to the area, and the house's connection to the District's plantation era.</p> <p>The Kapahu Living Farm will continue to be managed by park partners. It will be the site of interpretive and service learning programs that may include hands on, traditional Hawaiian farming practices. Depending on visitation, the parking area near the farm could be improved to accommodate general visitors and service-learning program participants.</p> <p>Interpretive programming will be provided at the arboretum, along trails, and at the campground.</p> <p>Additional waysides will be installed along trails to educate visitors about a wide variety of park topics including Hawaiian culture, history of the land and park, geology, hydrology, vegetation, wildlife and other park resources. Some waysides will include Hawaiian language text.</p>
Pools of 'Ohe'o as a "risk-aware area"	<p>Under this alternative, the park will potentially implement scheduled pool closures for resource protection as well as when safety concerns are present. Visitors will be allowed to access the Pools of 'Ohe'o at their own risk.</p> <p>The National Park Service will assess risks and eliminate or mitigate risks when reasonable and appropriate, and/or communicate risks to the public within the limits of available resources.</p> <p>The risk management role of the National Park Service from the perspective of geologic, water safety, and water quality hazards communications will be to provide visitors with the information needed to make informed decisions when taking on risk (NPS Director's Order #50C: <i>Public Risk Management Program</i>). Information about water safety and potential hazards could be written on a sign or spoken to visitors by a ranger. Safety messaging at the orientation plaza and at the pool entrance will provide visitors sufficient information to make informed decisions whether to visit the area. Where official access points exist to risk-aware areas, signs will be posted with maps and information on the hazards ahead.</p>

Alternative 2 Action	Description
Maintenance facilities	<p>The maintenance baseyard will remain in its existing location. A sustainable, permeable surface lot approximately 7,000 square feet in size will be added to formalize the employee parking area within the baseyard. The following temporary buildings will be replaced with permanent structures in the established baseyard that would be approximately the same size and at the same locations as the current, temporary buildings:</p> <ul style="list-style-type: none"> • Resource management office and storage (350 square feet) • Law enforcement office and storage (325 square feet) • Maintenance buildings, office, and storage (530 square feet) <p>Additional heavy equipment and vehicle storage (a closed-bay garage) and maintenance shed will be constructed on the <i>mauka</i> (mountain) side of the highway near the current rock yard. The approximately 4,500-square-foot garage will have closed bays for mechanical equipment and vehicles and offer covered open-air workspace. The approximately 1,950-square-foot maintenance shed will provide hazardous material storage and general storage space. A vegetative screen of native and/or culturally appropriate species will be planted near the road to block views of the new storage facilities from the highway.</p> <p>A permeable surface driveway (approximately 875 square feet) will be added from the informal baseyard parking area to the renovated bunkhouse to allow improved access for staff and equipment. The concrete two-track paving will be extended for approximately 1,750 linear feet on the maintenance access road to improve NPS vehicle accessibility to the water tanks.</p>
Formalizing existing park helipads	<p>The two park helipads (0.7 acres each) will be graded and paved. A landing site will be painted on the helipad and additional navigation and safety features will be added (wind sock, etc.) according to the Interagency Helicopter Operation Guide (IHOG) requirements.</p>
Staff housing	<p>Housing for up to three required occupants will be built according to the park housing management plan. Housing units may be built on the northwest side of the maintenance baseyard near the project helipad on the <i>mauka</i> (mountain) side of the highway or near the water tanks.</p>
Accessibility	<p>The National Park Service is obligated to ensure that all services, activities, and programs, when viewed in their entirety, are accessible to visitors and employees per Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination against individuals based on disability. Any new construction or alteration to a facility requires the National Park Service to provide accessible experiences throughout that facility and program.</p>

ALTERNATIVES CONSIDERED

Three alternatives were analyzed; a no action alternative, and two action alternatives. The no action alternative represents a continuation of current management actions and direction into the future with no additional park or visitor facilities and no additional visitor opportunities. Alternative 2, the selected action described above, represents expanded visitor opportunities within the Kīpahulu District; this alternative was selected as the NPS preferred alternative.

In alternative 3, visitor activities would focus on opportunities such as hiking, cultural experiences, and sightseeing. The Pools of ‘Ohe‘o would be closed for swimming or wading and designated as a closed area. Facilities and services would focus on providing visitor opportunities and experiences on the trails and in the

visitor center area; the visitor center would be renovated but remain at its current size and there would be no changes to the fee station. The campground would be formalized but there would be no additional management or programming in this area of the park.

PRELIMINARY ACTIONS CONSIDERED BUT DISMISSED

Several individual actions and concepts were considered during the planning process but were not carried forward in either action alternative.

- Comments received during the public scoping period and stakeholder workshop sessions suggested expanding Kapahu Living Farm to include additional park land. The farm is currently managed through a cooperative agreement regularly revised by the National Park Service and the nonprofit management entity and approved by the park superintendent. Changes to the farm—including changes in the current management structure or boundary adjustments to the farm—would be addressed through the agreement process and were deemed outside the scope of this plan.
- Feral animal management and invasive species management were mentioned during early public scoping efforts, but these topics are widespread management issues experienced throughout the park. Actions related to these topics would be the focus of resource management plans that would encompass all areas of the park and therefore were not included in this plan that only addresses management of the Kīpahulu District.
- Comments received during public scoping period and stakeholder workshop sessions suggested providing additional lo'i at the park. This option was dismissed from analysis because of the engineering efforts and adverse impacts to natural resources that would be associated with creating a new lo'i within the developed area of the Lower Kīpahulu Valley.
- Local residents who participated in the public scoping process asked if park visitor orientation and welcome functions could be better incorporated into the community of Hāna through an off-site visitor center. Public and staff indicated the need for an on-site hub of visitor activity, interpretation, education, and safety messaging. Park staff believe resources are best monitored through an on-site presence, and visitors are better served by on-site staff. Therefore, creating an additional visitor center in Hāna was dismissed due to its inability to meet project objectives or resolve need.
- The National Park Service considered expanding the Kahakai Trail to the west to expand visitor opportunities along the coast but an additional trail would duplicate an experience already offered by the park. In addition, the resources required to maintain new trail, monitor sensitive resources in the area, and provide a safe visitor environment would be economically infeasible at this time.
- The National Park Service considered relocating the park's maintenance facilities and operations from the established baseyard to other park locations including the NPS-owned parcel to the west of the Lower Kīpahulu Valley and across the Hāna Highway near the park water tanks and solar array. Both these options were dismissed as being technically and economically infeasible due to utility needs such as water and power, as well as potential noise impacts to park neighbors.

WHY THE SELECTED ACTION WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in CFR 40 Section 1508.27, significance is determined by examining the following criteria:

1. Impacts that may have both beneficial and adverse aspects in which on balance may be beneficial, but that may still have significant adverse impacts that require analysis on an Environmental Impact Statement.

No significant impacts to resources were identified that would require analysis in an environmental impact statement. Best management practices would be implemented to minimize any potential non-significant adverse impacts. Additional details on impacts to resources can be found in the environmental assessment.

2. The degree to which public health and safety are impacted.

Implementation of the selected action would result in direct beneficial impacts to visitor safety. Beneficial impacts would result from communication information about the risks associated with accessing the pools by providing messages necessary for visitors' to make informed decisions. Removal of visitor-created trails and campsites would guide where and how visitors access sites. By restoring these areas to deter access, visitors are less likely to unintentionally go to areas that may pose unknown risks to them. Beneficial impacts to visitor safety occur by providing a safe viewing platform at the Kūloa Point Trail the trail terminus overlooking Waimoku Falls, adaptive strategies to manage visitor safety during high water events, and actions to enhance and formalize the Pipīwai Trail crossing at the highway. Visitor safety would be benefited as reduced emergency response times could result from the provision of park housing within the Kīpahulu District. Overall, alternative 2 would likely result in greater beneficial impacts over the no-action alternative.

3. Impacts to any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).

Haleakalā National Park is a sacred place to *kānaka maoli* (Native Hawaiians) and is fundamentally linked to their traditional and contemporary beliefs, practices, and way of life. The 810-acre Kīpahulu Historic District, which extends *mauka* (upland) from sea level to the mouth of the Kīpahulu Valley on either side of the 'Ohe'o Gulch beyond the project area, has been proposed for listing in the National Register of Historic Places as a single archeological district containing precontact and historic features. The Kīpahulu Valley is part of a broad Traditional Cultural Property that is important for its association with known traditional uses, oral history, *mele* (Hawaiian language chants or songs), and legends, as well as its role as a source for traditional resources and materials. However, nothing included in the plan alternatives would affect the overall landscape of the Kīpahulu area. Development in action alternatives would be limited and any new construction would consider the overall landscape and viewshed per public and park staff comments collected during scoping. Additional consultation with the Hawaii State Historic Preservation Division, Native Hawaiian Organizations, and park kūpuna groups will be completed for individual projects with the potential to affect resources within the Kīpahulu Historic District once construction and location details are adequate to complete a thorough section 106 Assessment of Effects.

Six federally threatened and endangered species were identified as potentially being found within or flying through the project area. Through consultation with the U.S Fish and Wildlife Service, a determination of "no effect" was found for the identified federally listed species in the project area. The selected action alternatives would not adversely impact critical habitat or migration patterns for the federally listed species because no critical habitat exists within the project area. In addition, no floodplains, prime farmlands, wetlands, wild and scenic rivers, or other ecological critical area would occur as a result of the selected action.

4. The degree to which impacts are likely to be highly controversial.

Throughout the plan development process, no identified environmental impacts have been indicated as

controversial. Some concerns about access for Native Hawaiian cultural practitioners and water quality impacts from visitors swimming or wading in the Pools of 'Ohe'o and the addition of impervious surfaces in the overflow parking lot and expansion of visitor facilities were expressed during public comment periods. As noted in the plan, the selected alternative would not alter Native Hawaiians access to the Pools of 'Ohe'o. Water quality impacts were analyzed as part of the environmental assessment and were found to not be significant based on the size of the area potentially affected in relation to the total watershed and the natural capacity of the watershed to infiltrate and filter water.

5. The degree to which the potential impacts are highly uncertain or involve unique and unknown risks.

The proposed management actions address natural and cultural resource protection, visitor access and enjoyment, and park operations within the Kīpahulu District. The anticipated impacts to resources, as analyzed in the environmental assessment, are not highly unique and do not involve unknown risks. Resource conditions in the project area are well known and the anticipated impacts from implementing the selected actions are understood based on National Park Service experience with similar projects.

6. Whether the action may establish a precedent for future actions with significant impacts or represent a decision in principle about a future consideration.

The selected actions in the Kīpahulu Comprehensive Plan would not likely set a precedent for future actions that could have significant impacts because there have been no significant impacts identified as a potential result of the selected actions. In addition, there are no known reasonably foreseeable future actions under consideration that may be set on a precedent or principal derived from this project.

7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant impacts. Significance cannot be avoided by terming an action temporary or breaking it down into smaller counterparts.

The environmental assessment concluded that the proposed management actions in the Kīpahulu District would result in beneficial impacts but not offset the adverse cumulative impacts for several of the resource topics. Actions in this plan would not contribute impacts that would individually or cumulatively result in significant adverse impacts.

8. The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

The project area lies within the Kīpahulu Historic District, an 810-acre district significant for its archeological resources. Management actions proposed in the Kīpahulu Comprehensive Plan. The current comprehensive planning effort provides management actions and additional proposed developments within the project area and mitigation measures to avoid impacts to cultural resources. Related selected actions that have potential to affect National Register-eligible historic resources include:

- Re-aligning and re-opening the Kapahu Trail for ranger-guided hikes, and the addition of a spur trail to the Kanalulu House
- Developing a new 2,100-linear-foot accessible trail linking the campground and an ocean overlook
- New overlook at Pīpīwai Trail terminus (site plan included in the EA on page 22)
- New arboretum and research lab featuring native and Polynesian plants
- Improvements to the campground
- Interpreting the historic Kanalulu House
- Installing permeable surface driveway and concrete two-track on park roads in the park maintenance baseyard and on the water tank access road
- Improvements to the maintenance baseyard and bunkhouse
- Pedestrian crossing on Hāna Highway
- Formalizing the existing park helipads
- Developing staff housing
- Expansion of the Visitor Center
- Development of an orientation plaza
- Fee station expansion
- Oversized vehicle drop-off expansion
- Overflow parking lot improvements
- Picnic area additions.

At this time, there are not enough details associated with the design, location, and implementation of these individual actions to complete assessment of effects associated with Section 106. Haleakalā National Park commits in this decision to complete the Section 106 review for federal undertakings that have the potential to affect historic properties that stem from the Kīpahulu Comprehensive Plan Environmental Assessment in accordance with the 2002 Programmatic Agreement between Haleakalā National Park, The Advisory Council on Historic Preservation, and the Hawaii State Historic Preservation Officer, the 2008 Programmatic Agreement among the National Park Service, the ACHP, and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act and the ACHP's regulations (36 CFR Part 800).

9. The degree to which an action may adversely affect Endangered or Threatened species or its habitat.

Following a comprehensive review and consultation with the US Fish and Wildlife Service Pacific Islands Fish and Wildlife Office, the selected actions would not result in adverse impacts to any federally listed species or habitat or other special status species and this topic was dismissed from further analysis in the environmental assessment.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The selected actions do not violate any federal, state, or local environmental protection laws.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

On October 1, 2018, Haleakalā National Park released the final draft of the Kīpahulu Comprehensive Plan/Environmental Assessment (EA). To reach a broad audience, announcements were distributed by e-mail and/or hard copy to local, state, and federal government officials; Native Hawaiian organizations; park neighbors; and other individuals who had previously expressed an interest in the planning process. The park also distributed a press release to major local and regional news outlets. Multiple articles on the plan's release were also circulated on local and national outlets during the comment period. The park hosted a public open house meeting on Monday, October 15, 2018, to share information on the draft plan/EA, answer questions, and record public input.

Comments and Issues

During the public review of the plan/EA, approximately 65 correspondences were received through the NPS Planning, Environment, and Public Comment (PEPC) website or by mail and e-mail sent directly to Haleakalā National Park. These comments were submitted primarily by Maui residents, but comments were received from numerous states and countries. A public comment summary was prepared with similar subjects grouped together to provide a thorough analysis of all public comments received. The objective of the comment review was to reveal public concerns about particular issues and alternatives.

Comments from the October 15, 2018 meeting were summarized and discussed along with the written correspondences received through the project PEPC websites, emails sent directly to park staff, and hand-written comment cards delivered to the park visitor centers.

Summary of main comments and concerns:

- A few commenters questioned the accuracy of the plan purpose and need, mostly related to management issues currently faced by the park. Commenters did not feel the campground was experiencing vandalism and overcrowding and felt current safety and directional signage was adequate.
- Many commenters shared a preference for the no-action alternative and opposed additional development and changes in management in the Kīpahulu District.
- Commenters both supported and did not support opening the Pools of 'Ohe'o for visitors to access at their own risk. Those that supported reopening the pools said experiencing the pools was a key park experience and expressed disappointment that they were unable to swim during previous visits to the park. Those in favor of closing the pools felt that a permanent closure would improve water quality and condition of resources.
- Several commenters were against proposed changes to the campground. Commenters did not like the

idea of formalizing the space by delineating sites with stone walls, numbering campsites, and designating tent pads. They also did not support additional management of the campground in the form of a reservation system, permits, or a campground host.

- Commenters supported the creation of a research nursery and arboretum featuring native and culturally important plants.
- Commenters stated that Native Hawaiian culture should be better incorporated into and represented at the park and throughout the plan.
- Some commenters expressed interest in horseback riding at the park through commercial tours.
- Commenters emphasized the importance of the park working with local organizations, park neighbors, surrounding communities, and other local/state/federal agencies to improve the management of the park, increase Native Hawaiian cultural offerings, and support any additional programming.
- Commenters expressed interest in potentially limiting visitor access while not limiting local and Native Hawaiian access to the park and visitor facilities.
- Commenters felt that the park should be investing in the neighboring communities of Kīpahulu and Hana in the forms of direct federal funding, hiring of local people for projects and as park staff, using local materials and companies for future construction projects, and improving public roads leading to the park.
- A few commenters questioned the legitimacy of federal ownership of lands in the Kīpahulu District.

Hawaii State Historic Preservation Division

On April 2, 2018, the National Park Service notified the State of Hawaii Department of Land and Natural Resources – State Historic Preservation Division (SHPD) that the agency was developing a comprehensive plan and environmental assessment for the Kīpahulu District. The letter--submitted electronically to the SHPD tracking system--included the selected actions in the preliminary plan alternatives and a draft Area of Potential Effect (APE) to begin Section 106 consultation. The letter and supporting materials were forwarded to the SHPD Archeology Branch. On April 16, the state historic preservation division requested additional information regarding the acreage and historic properties located within the Area of Potential Effect.

On October 1, 2018, the National Park Service electronically submitted the Section 106 Assessment of Effects (AoE) and supporting material to the state historic preservation division, where project review was assigned to the Archeology Branch. The plan/EA and AoE were also shared with associated state historic preservation organizations at this time. In a letter dated November 19, 2018, SHPD requested additional information related to the actions proposed under alternative 2 and their potential effects on historic properties identified in the APE.

On December 21, 2018, the National Park Service provided additional maps and location data for historic resources within the APE and the generalized location of proposed improvements included in the comprehensive plan. Due to the comprehensive nature of the plan, exact design details and construction activities for all associated actions have not been determined. In the December 21, 2018 correspondence to

SHPD, the National Park Service requested concurrence on a "No Adverse Effect" determination for the comprehensive plan and committed to additional consultation related to individual actions associated with implementation of the plan. SHPD did not provide a response within 30 days of receipt of the December 2018 consultation letter. Therefore, the NPS can proceed in accordance with 36 Part 800.5(c)(1).

Since the NPS cannot yet assess the specific effects of some individual projects on historic properties carried out as the selected alternative is implemented, the National Park Service commits to conducting Section 106 compliance and continue to consult with the SHPO, traditionally associated tribes and other consulting parties as necessary in accordance with the 2008 Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation (ACHP), and the National Conference or State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act and the ACHP's regulations (36 CFR Part 800).

State of Hawaii Office of Hawaiian Affairs

In a letter dated October 18, 2018, the State of Hawaii Office of Hawaiian Affairs (OHA) suggested the park create a preservation plan in consultation with local Native Hawaiian organizations to avoid archeological resources or, if not possible, further mitigate the effects of ground disturbances associated with proposed improvements in the plan. OHA also requested the park prepare a Native American Graves Protections and Repatriation Act (NAGPRA) plan of action to ensure proper care and treatment of the iwi kūpuna.

In a response dated December 21, 2018, the National Park Service provided additional maps and location data for historic resources within the Area of Potential Effect and all available details related to proposed improvements included in the comprehensive plan. No further objections were received from OHA. Section 106 consultation will continue for individual projects in the plan that may affect identified historic resources, including realignment of the Kapahu Trail and construction of new visitor and park facilities located in proximity to known archeological sites. Known burial sites, which were included as archeological sites in the provided maps, will be preserved in situ in accordance with NPS management policies; if an inadvertent discovery is made during the implementation of the Kīpahulu Comprehensive Plan, the park will notify all associated Native Hawaiian organizations and initiate the NAGPRA consultation process in accordance with federal regulations.

Historic Hawaii Foundation

In a letter dated October 31, 2018, Historic Hawaii Foundation (HHF) requested that the National Park Service revise the Area of Potential Effect to include the O'heo and Pualu'u Bridges, two historic bridges located along the Hana Highway (Hawaii Route 360), and that the National Park Service provide additional information on the location of historic resources within the APE and the locations of proposed improvements. 'Ohe'o Bridge is located within the legislative boundaries of Haleakalā National Park, but is under the jurisdiction of the County of Maui. The second bridge, historic Pua'alu'u Bridge, is not located within the legislative boundaries of Haleakalā National Park and is not part of the APE.

The National Park Service provided maps of the updated Area of Potential Effect with historic bridges and detailed maps of historic resources in a response dated December 21, 2018. No further communications were received from HHF.

U.S. Fish and Wildlife Service

In April 2017, the National Park Service notified the U.S. Fish and Wildlife Service (USFWS) that the agency was developing a comprehensive plan for the Kīpahulu District and was initiating consultation on the project. The U.S. Fish and Wildlife Service identified six federally listed wildlife species as potentially being found within or flying through the project area and no federally listed or threatened plant species in the project area.

Haleakalā National Park compliance and resource management staff consulted with the members of the U.S. Fish and Wildlife Service Pacific Islands Fish and Wildlife Office throughout development of the plan and determined there would be "no effect" to the orangeblack Hawaiian damselfly (*Megalagrion xanthomelas*), Hawaiian petrel (*Pterodroma sandwichensis*), Band-rumped storm-petrel (*Oceanodroma castro*), and

the threatened Newell's shearwater (*Puffinus auricularis newelli*). While there is little potential for actions in the plan to affect the Hawaiian hoary bat (*Lasiurus cinereus semotus*) and Nēnē (*Branta sandvicensis*), these species are covered in a previous biological opinion authored by the park in 2012.

The assessment of no affect is documented in an email sent to the park environmental compliance lead from a USFWS Pacific Islands Fish and Wildlife Office contact on November 13, 2018. The park will continue to informally consult with representatives of the USFWS Pacific Islands Fish and Wildlife Office as projects associated with the comprehensive plan are initiated to ensure the identified species are not affected during the implementation of the selected alternative.

State of Hawaii Department of Land and Natural Resources

The National Park Service transmitted the Kīpahulu Comprehensive Plan/Environmental Assessment (EA) to the State of Hawaii Department of Land and Natural Resources (DLNR) on October 1, 2018. The plan/EA was internally forwarded in a memorandum dated October 5, 2018, to the following DLNR agencies for review: Engineering Division, Division of Forestry and Wildlife, Division of State Parks, Land Division-Maui District, and Historic Preservation. The following comments were received:

- Division of State Parks – We have no comments. (Received October 10, 2018.)
- Engineering Division
“The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high-risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:
Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.”
(Received October 12, 2018.)

- Land Division- Maui District – We have no comments. (Received October 24, 2018.)

County of Maui

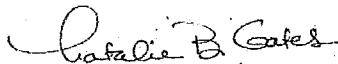
The National Park Service transmitted the plan/EA to the County of Maui Environmental Management Department for review on October 1, 2018. The document was internally distributed and reviewed by the Solid Waste Division and the Wastewater Reclamation Division. No comments were submitted as a result of this review, as documented in a letter from Environmental Management to the National Park Service dated November 20, 2018.

CONCLUSION

As described above, the selected action does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement. The selected action would not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with general beneficial impacts to ethnographic resources and traditional cultural practices, visitor experience, and socioeconomics. There are no unmitigated adverse impacts on public health, public safety, or threatened or endangered species.

No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative impacts, or elements or precedence were identified. Implementation of the actions would not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and thus will not be prepared. The Kīpahulu Comprehensive Plan will be implemented as soon as practical when funding becomes available.



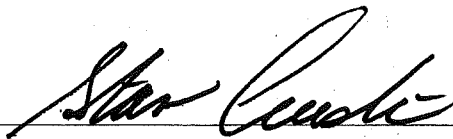
Recommended:

2/14/2019

Natalie B. Gates, Superintendent
Haleakalā National Park

Date

Approved:



Stanley J. Austin, Regional Director
National Park Service, Pacific West Region

2/28/19

Date

ATTACHMENT: ERRATA AND RESPONSE TO COMMENTS

The Haleakalā National Park Kīpahulu Comprehensive Plan/Environmental Assessment was made available for public review during a 30-day period from October 1 through October 31, 2018. One public meeting was held during the comment period on October 15, 2018, at the Kīpahulu District Visitor Center.

Sixty-five (65) correspondences were received and documented in the NPS Planning, Environment and Public Comment (PEPC) website from individuals, organizations, and federal, state, and county agencies. Additional comments were recorded by NPS staff during the public meeting.

This attachment includes two parts. Part 1 includes minor edits and technical revisions to the environmental assessment that resulted as a response to comments received from general commenters and consultants during the public review period. Page numbers referenced pertain to the 2018 *Haleakalā National Park Kīpahulu Comprehensive Plan/Environmental Assessment* (EA). The edits and technical revisions did not result in any substantive modifications being incorporated into the selected action, and it has been determined that the revisions do not require additional environmental analysis. Part 2 contains responses to substantive public comments on the plan. In some cases, the National Park Service chose to respond to some nonsubstantive comments received during the review period when doing so helped clarify aspects of the selected action.

The Errata, when combined with the plan/EA, comprises the only amendment deemed necessary for the purposes of completing the Final Haleakalā National Park Kīpahulu Comprehensive Plan/Environmental Assessment.

MINOR EDITS TO THE ENVIRONMENTAL ASSESSMENT

Some comments necessitated minor corrections to the environmental assessment or additional language to provide clarification. These technical revisions and additions are noted below.

1. **Addition.** Page 5, Planning Issues Identified During Project Scoping—Potential Expansion of the Kapahu Farm:

Comments received during the public scoping period and stakeholder workshop sessions suggested expanding Kapahu Living Farm to include additional park land *and improvements to the farm access road*. The farm is currently managed through a cooperative agreement regularly revised by the National Park Service and the nonprofit management entity and approved by the park superintendent. Changes to the farm—including changes in the current management structure or boundary adjustments to the farm—would be addressed through the agreement process and were deemed outside the scope of this plan. *Improvements to the existing farm access road are being pursued through a categorical exclusion and do not need additional environmental analysis; therefore, the action was not included in the alternatives presented in Chapter 2.* Changes in public access and visitor opportunities offered at Kapahu Living Farm are included in the action alternatives (alternative 2 and alternative 3).

2. **Addition.** Page 47, Environmental Consequences of Alternative 2 (Preferred Alternative):

All construction activities related to actions proposed within alternative 2 would comply with The Secretary of Interior's *Standards and Guidelines for Archeology and Historic Preservation and Standard for Treatment of Historic Properties* and Director's Order 28: *Cultural Resource Management*.

RESPONSES TO COMMENTS

Most of the verbal and written responses to the plan/EA expressed an opinion or preference; some were substantive. A substantive comment is defined by NPS Director's Order 12, section 4.6A as one that does the following:

- question, with a reasonable basis, the accuracy of information in the environmental analysis;
- question, with a reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the environmental analysis; and
- cause change or revisions in the proposal.

The following are NPS responses to substantive comments received during the public review of the Kīpahulu Comprehensive Plan/Environmental Assessment. In some cases, the National Park Service chose to respond to some nonsubstantive comments received during the review period, when doing so would help clarify aspects of the selected action. As noted above, there were no substantial modifications required for alternative 2 (NPS preferred alternative), which has been selected for implementation.

Purpose and Need

A few commenters questioned the accuracy of the plan purpose and need, mostly related to management issues currently faced by the park. Commenters did not feel the campground was experiencing vandalism and overcrowding and felt current safety and directional signage was adequate.

NPS Response: The purpose and need for the Kīpahulu Comprehensive Plan was developed from comments received from the public during general public outreach activities dating as far back as 2012, ongoing consultation with the Kīpahulu kūpuna and nonprofit partners, and operational and park management issues discussed during internal scoping. These planning issues were refined throughout the plan's development and used as the basis for the plan purpose and need articulated on pages 1-4.

Issues related to current campground management, protection of natural and cultural resources from visitor impacts, and continuing issues with visitor safety were mentioned during internal and public scoping during plan development. The topics are described on pages 4-5 as part of "Planning Issues Identified during Project Scoping."

Support for No-Action Alternative and/or Limited Development in the Kīpahulu District

Many commenters shared a preference for the no-action alternative and opposed additional development and changes in management in the Kīpahulu District. Those that commented on this topic worried additional construction or paving would destroy the District's undeveloped feel and that any additional visitor facilities would result in an increase visitation to the park and related traffic. Commenters opposed offering additional visitor opportunities in the area in an attempt to disperse visitation throughout the District, mentioning that additional opportunities would create additional safety concerns and that the park was unable to properly manage the current level of visitation and related resource impacts.

NPS Response: The objective of the comprehensive plan is not to increase visitation to the Kīpahulu District, but to effectively manage current visitation levels and provide appropriate resource protection. Actions in the plan work to increase the quality of visitor experience while reducing visitor-caused impacts to the park's natural and cultural resources; promote visitor and staff safety; and ensuring adequate operational capacity. The park is currently experiencing damage to natural and cultural resources and needs to take appropriate actions to address causes and issues related to resource protection and effective park management. The no-action alternative, which represents a continuation of current management into the future and no additional facilities for park operations or visitors, would not resolve current issues and resource damage that is summarized in the purpose and need for the comprehensive plan

as described on pages 1-4.

The park is strongly committed to preserving and promoting the remote and undeveloped nature Native Hawaiians and visitors associate with Kīpahulu. Actions included in this plan balance the undeveloped Hawaiian setting with appropriate facilities that will help protect resources, promote visitor and staff safety, and support efficient park operations. Management strategies included in the plan may be considered by park staff in the future to manage visitor capacity across the District; the National Park Service will use the minimal amount of regulation needed for visitor and campground management to address existing resource protection issues. The park will continue to consult with cultural experts and kūpuna associated with the Kīpahulu District to create an appropriate design for the expanded visitor center and other newly constructed buildings.

Management and Formalization of the Campground

Many commenters were against proposed changes to the campground. Commenters who did not support proposed changes to the campground felt that formalizing campsites with the additional of numbered sites, tent pads, and delineated sites would ruin the current undeveloped camping experience and prevent use of the campground by large groups. Local commenters felt that a reservation system would favor out-of-town visitors over locals and would make it difficult for Maui residents to have spontaneous weekend camping experiences. Commenters wanted any permit or reservation system to allow some last minute sites to remain available for spontaneous camping.

NPS Response: Overcrowding, vandalism, and damage to natural and cultural resources were documented as planning issues during public outreach and internal scoping activities. Public commenters and park staff expressed a desire for more proactive management to protect resources and reduce crowding. Active management and additional regulation of camping included in the plan would only be implemented to the extent needed to reduce impacts to the visitor experience, safety, and natural and cultural resources. The park would continue to provide limited camping opportunities for same day reservations available on a first come, first served basis. Management strategies related to crowding and damage to resources are included in “Appendix B: Visitor Use Management Indicators and Thresholds” (pages 105-115); visitor capacity for the campground is discussed in “Appendix C: Visitor Capacity Identification” on page 119.

Environmental Impacts from Construction Activities

Some commenters mentioned potential impacts to water quality and vegetation from the construction of new visitor and park facilities included in the plan.

NPS Response: Construction related impacts were included as part of the analysis of impacts to water quality, archeological resources, ethnographic resources, visitor use and experience, and socioeconomics in “Chapter 3: Affected Environmental and Environmental Consequences” (pages 39-67). Construction activities would result in short term impacts to water quality and vegetation within the project area. These would last for the duration of construction and would be largely mitigated by the use of NPS best management practices and mitigation activities included in “Appendix D: Monitoring Guidelines and Mitigation Measures for Alternatives” (pages 125-128).

Environmental Impacts from Employee Housing

Some commenters were concerned about potential impacts of park employee housing to water quality in the District. Others felt it was not necessary to increase law enforcement presence at the park through onsite housing.

NPS Response: Adding up to three employee housing units to the Kīpahulu District would result in impacts to water quality related to construction activities and additional impermeable surfaces as described in the water quality impact analysis on pages 42-46. NPS staff housing

could affect socioeconomics of the area; this potential impact is discussed on page 64. Wastewater generated by staff housing units would be treated according to state and local regulations and no additional water quality impacts are anticipated.

The park housing management plan, completed prior to the Kīpahulu Comprehensive Plan, identifies the need for up to three, staff housing units in the District because of its remote location. Onsite housing for law enforcement and a water treatment plant operator would improve response time for emergencies and illegal resource damage. Staff housing could help with law enforcement ranger retention, which would benefit park operations. This planning issue is described on page 3.

Environmental Impacts from Increased Visitation

Some commenters worried that actions included in the plan would increase visitation to the Kīpahulu District and actually contribute to additional visitor related impacts instead of addressing the issues described in the plan purpose and need. Commenters worried that increased visitation could result in more water contaminants and trash, increased traffic near the park, and additional safety issues associated with existing and new visitor experiences in the District.

NPS Response: The objective of the plan is not to increase visitation to the Kīpahulu District, but to effectively manage visitation at current levels and provide appropriate resource protection. The primary goal of this planning effort is to preserve the fundamental resources and values. Visitor use management is one component of the plan purpose and need and provides tools to help the park proactively safeguard the highly valued visitor experiences and resources in the District as the plan is implemented. Indicators have been identified to evaluate changes in resource and experiential conditions, and thresholds will be monitored to ensure that acceptable resource and experiential conditions are maintained over time. A complete description of indicators, thresholds, monitoring protocols, management strategies, and mitigation measures are included in appendix B (pages 105-115). Identified visitor capacity and implementation strategies can be found in appendix C (pages 117-124).

Water Quality

Commenters mentioned potential impacts to water quality and coastal ecosystem health from construction activities, the addition of staff housing in the park, an increase the amount of paving and other impermeable surfaces in the District, an increase in visitor opportunities, contaminants introduced by visitors swimming/wading in the Pools of 'Ohe'o, and trash created by increased visitation.

NPS Response: Water quality is retained as an affected environmental topic and discussed on pages 42-46. Adverse impacts result from the small increase in impermeable surfaces, reduction of vegetated area, and expansion or rerouting of trails. The selected alternative may result in a slight decrease of water quality across a number of metrics directly downstream from the project site into the ocean. These impacts would be minimized by the size and natural buffering capacity of the watershed. Short-term impacts related to construction activities would be mitigated through stormwater best management practices and conscientious timing. Overall, actions proposed in the plan would contribute slightly to but would not substantially change the water quality impacts that are already occurring in the District.

The water quality analysis includes consideration of pollutants introduced by visitors swimming or wading in the Pools of 'Ohe'o. While visitors can continue to access the pools at their own risk under the selected alternative, a water quality indicator and thresholds related to sunblock chemicals that are harmful to the Pipīwai Stream ecosystem have been identified as part of the visitor use management component of the plan. As stated on page 115, pilot benzophenone monitoring studies will commence when the pools reopen for public use, and results of the pilot studies will be used to evaluate the need for regular monitoring. Potential future management strategies and mitigation measures to manage water quality include selling environmentally friendly sunscreen in the gift shop, education about the dangers of oxybenzone, and pool closures for resource protection.

Water Usage and Wastewater

Some commenters were concerned about additional water usage at the campground and any new staff housing under this plan. One commenter requested compostable restroom options at the park.

NPS Response: Current wastewater produced by park operations and restrooms is being treated appropriately and flush toilets are in compliance with state and local regulations. The plan does not propose replacing existing restroom facilities with compostable bathrooms due to the cost and efficacy of replacement. Wastewater generated by staff housing units would be treated according to state and local regulations and no additional water quality impacts are anticipated.

Protection of Archeological and Cultural Resources

Some commenters felt not enough was currently being done to protect cultural resources and archeological sites in the District from visitor related impacts.

NPS Response: Resource damage resulting from congestion and crowding was identified as a planning issue on pages 1-3 of the plan and discussed in archeological resources affected environment on pages 46-47. Changes to campground management, formalization of the campground, additional interpretation and education related to Native Hawaiian connections to park resources, and other actions in the selected alternative are intended to decrease the likelihood of vandalism and unintended visitor damage to archeological sites and in situ resources.

Damage to archeological resources is identified as a resource indicator and threshold related to visitor use management in the District. Monitoring guidelines, potential visitor and resource management strategies, and mitigation measures related to this indicator topic are described in "Appendix B: Visitor Use Management Indicators and Thresholds," on pages 106-107.

Horseback Riding

Some commenters expressed interest in horseback riding at the park through commercial tours. These commenters viewed commercial horseback riding as an opportunity to support local business and said they had enjoyed horseback riding tours when they were previously offered. One commenter saw the need to update the trails to reduce erosion and ensure horses were kept off private property.

NPS Response: Under the park's commercial services plan, horseback riding tours are managed under commercial use authorizations, (CUAs) and the 2013 Kīpahulu Commercial Services Plan (CSP) allows for one CUA/provider for horseback riding tours in Kīpahulu. An interested horseback riding tour provider could apply for a CUA in the future under the 2013 CSP. However, the horse trail in the District is currently not maintained, and horseback riding tours are infeasible within the current and proposed trail system.

Kapahu Living Farm Improvements

Some commenters suggested several improvements to the Kapahu Living Farm. These include paving the Kapahu Living Farm access road, creation of a space for volunteers and visitors to park and gather, improving existing condition of taro plantings and reestablishing a lo'i (terraced wetland taro farming), and providing potable water to a kitchen facility located about a mile from the park that is operated by the Kīpahulu Ohana.

NPS Response: Expansion of the Living Farm was considered outside the scope of the current plan, as discussed in "Planning Issues Identified During Project Scoping" (page 5). Changes to the farm, including boundary adjustments to the Farm, are not anticipated in the immediate future and would be addressed through a cooperative agreement between the park and the nonprofit management entity. Responses to comments related to actions within the area currently managed by the Ohana include:

- Compliance related to Kīpahulu Farm access road improvements was completed prior to this planning effort. Approximately 200 yards of concrete two-track was installed on two of the four sections of the access road to improve conditions. Pending the initiation of public tours of the Kapahu Living Farm, the park is pursuing installation of concrete two-track on the remaining 200 yards of road under the National Environmental Protection Act as a categorical exclusion, with cultural compliance covered under the park's Programmatic Agreement with the State Historic Preservation Division.
- Creating a lo'i (wetland taro patch) in a new area of the Farm was deemed infeasible based on water availability and current capacity of the Ohana and NPS staff to monitor and maintain new and expanded agricultural acreage. This selected action is discussed in "Preliminary Options Considered but Dismissed from Detailed Evaluation" on page 35. Under the selected alternative, dryland taro patches, already located along the Pīpīwai Trail and in the parking lot terracing would be maintained and interpreted as park staff and funding becomes available.
- In 2012, the park responded to the Ohana's request for sale of water outside the boundaries of the national park area to support an off-site kitchen facility. The letter outlined the impacts, challenges, and conditions related to connecting to the NPS water system in Kīpahulu. The National Park Service feels these concerns and impacts are still valid. As of this time, the park is unable to approve the request because of potential resource impacts, necessary park investment, and additional park staff responsibilities.

Unlicensed Commercial Activity

Some comments from the public meeting and one comment received through the PEPC site mentioned unauthorized commercial activity taking place in the Kīpahulu District. The commenters felt the park should be more active in prosecuting unauthorized tours and guides because they can affect authorized businesses.

NPS Response: The park has an established process for monitoring and prosecuting illegal activities such as unauthorized commercial use within the District and relies on authorized commercial users and other visitors to help report and identify such activities. The park is committed to monitoring and prosecuting unauthorized commercial use and will continue such efforts in the future.