



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

## **Haleakalā Sunrise Visitation Finding of No Significant Impact**

September 2018

### **BACKGROUND**

Sunrise viewing at the summit of Haleakalā is a top visitor attraction on Maui. Pre-dawn through sunrise is the busiest time of day and there has been an ongoing, steady, and significant increase in sunrise visitation. In recent years, the increase has been particularly striking, with an average of 21% more cars arriving for sunrise between 2015 and 2016. As of September 2016, non-commercial vehicles were regularly exceeding available parking capacity by an average of 100 vehicles each morning (Haleakalā National Park, unpublished data).

This finding of no significant impact and its associated environmental assessment constitute the record of the environmental impact analysis and decision-making process. The National Park Service will implement the selected alternative (proposed action) to manage sunrise visitation. The proposed action aims to protect the area's natural and cultural resources while improving the visitor experience and visitor safety. The proposed action was selected after careful analysis of resource 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 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 at <https://parkplanning.nps.gov/projectHome.cfm?projectID=63985>.

### **PURPOSE AND NEED FOR FEDERAL ACTION**

In October of 2016, after concerns were raised about the safety of visitors and park staff, as well as damage to sensitive natural and cultural resources, the National Park Service implemented emergency restrictions to address the problem of overcrowding at the summit during sunrise hours. A pilot reservation system was developed to limit the number of non-commercial vehicles allowed into the four highest parking lots in the summit district of the park between 3:00 and 7:00 AM to no more than 150 (the total number of available parking spaces). Visitors planning to travel to the summit for sunrise viewing are now required to purchase

a \$1.50 reservation online up to 60 days in advance at the recreation.gov website and show photo identification matching the name on the reservation while paying their park entry fee at the entrance station. The reservation system began on February 1, 2017, and has dramatically reduced sunrise crowding, safety concerns and the resource damage noted prior to implementation. The emergency restrictions implemented in 2016 were intended to be temporary in nature and designed to reduce concerns about safety and resource damage while the National Park Service studied the issue in more detail to ensure the best possible long-term solution.

## **SELECTED ALTERNATIVE (PROPOSED ACTION)**

Based on the analysis presented in the environmental assessment, the National Park Service has selected Alternative 2: Proposed Action (continue reservation system) for implementation. The proposed action is to continue the current reservation system as a long-term solution to the problem of overcrowding during Haleakalā summit sunrise viewing. In October of 2016, the National Park Service implemented emergency sunrise restrictions in response to hazards to visitor and park staff safety, as well as potential damage to sensitive natural and cultural resources, due to overcrowding at the summit during sunrise hours. The implemented interim reservation system was designed to limit the number of private vehicles allowed into the four highest parking lots in the summit district of the park between 3:00 and 7:00 AM to no more than 150 and is expected to reduce the overall number of visitors. Most daily reservations are made available 60 days in advance through the recreation.gov website, with the remainder released two days in advance to allow for less planned visits.

Modifications to the system may be required to optimize the number of visitors traveling to the summit each morning and further improve the visitor experience, while still ensuring visitor and staff safety and protection of the natural and cultural resources at the summit. Potential modifications could include increasing the number of reservations available each day to account for no-shows, adjusting the number of available reservations on a seasonal basis, adjusting the balance of reservations available 60 days versus two days in advance, or changing the advance release dates for reservations. Additionally, future modifications to the recreation.gov website could allow for cancellations, prevent visitors from reserving more than one day within a certain time period to prevent “hoarding” of reservations over several days by visitors who only expect to use one day, and also allow visitors who are not able to purchase a reservation to sign up on a waiting list should a reservation become available<sup>1</sup>. The proposed action will not impact the National Park Service’s current policy regarding Kanaka Maoli whom wish to conduct traditional cultural practices in the park. The National Park Service will continue to waive the entrance fee for Native Hawaiians who wish to conduct their traditional cultural practices at sunrise or any other time of day.

## **ALTERNATIVES CONSIDERED**

Three alternatives were analyzed; a no action alternative, and two action alternatives. The no action alternative comprised a return to unlimited sunrise summit visitation in effect prior to the 2016 implementation of emergency restrictions and provided a basis for comparison for the two action alternatives and their environmental consequences. One of the action alternatives (Alternative 3: Close at

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<sup>1</sup> At the time of writing, these options were not available through the recreation.gov website reservation system.

Capacity) comprised removal of the temporary reservation system and replacement with a “first come, first served” policy for summit sunrise visitation. Under this alternative, in the hours prior to sunrise, park staff would allow the first 150 non-commercial vehicles to enter the summit district. Once the 150-car limit was reached, the entrance gate would be closed and not reopened until after sunrise hours. Law enforcement staff would potentially be required to manage and inform visitors who arrived after the parking lot capacity was reached. Noncommercial vehicles in excess of 150 would be turned around at or downhill from the park entrance station. Approved commercial tour vehicles and all other employees of the Haleakalā High Altitude Observatories (HO) site (situated on State conservation land owned by the University of Hawaii) at the Haleakalā summit would be allowed entry into the summit district during this time but would likely have difficulty reaching the entrance due to backed up traffic from non-commercial vehicles outside the park gate.

## **PRELIMINARY ALTERNATIVES CONSIDERED AND DISMISSED**

Two alternative means of managing sunrise summit visitation were considered and dismissed: 1) increasing parking spaces and/or other infrastructure at the summit to accommodate more visitors, or 2) implementing a shuttle system to replace or complement the use of private vehicles by visitors. During the initial public scoping period, several commenters suggested constructing more parking spaces at the summit, either by expanding the existing overlook parking lots or by creating new overlooks and parking lots. Some commenters also suggested constructing additional viewing platforms or bleachers to increase the number of people who could be accommodated for sunrise viewing. This option was considered and dismissed because it does not meet the purpose and need for the action. Construction of additional parking lots or spaces would require substantial ground disturbance and development in the summit area, with potentially significant adverse impacts to threatened or endangered wildlife and plants, as well as cultural resources such as archaeological sites. Furthermore, increasing the number of visitors allowed to the summit for sunrise would likely not only diminish the experience for all visitors, but would likely lead to more visitors walking off trail, damaging natural and cultural resources.

Creation of a shuttle system, similar to visitor transportation systems of other large popular national parks, would allow for use of shuttle buses to transport visitors during sunrise hours or all day. The bus system could either entirely replace the use of private vehicles or supplement them by allowing entry of a certain number of vehicles and then requiring additional visitors to use the shuttle. It was also suggested that a video or audio presentation could be provided during the drive to educate visitors about the sensitive natural and cultural resources at the summit and help reduce resource damage from visitors straying off established paths and viewing platforms. It was noted that depending upon implementation, a shuttle system could allow the park to manage not only the number of cars at the summit but also the overall number of visitors. While the shuttle alternative fulfills some of the purpose and need for action – reducing risks to employees and visitors and reducing impacts to natural and cultural resources – and was suggested by multiple commenters, it was considered and dismissed from this environmental assessment for several reasons. First, a shuttle system is not feasible at present because it would require a large financial investment, currently not feasible, and several years to implement. Costs would include some or all of the following: contracting or purchasing and maintaining shuttle vehicles, construction of support facilities including a fueling station and maintenance yard, construction of a large new parking lot for visitors inside or outside the park, and hiring/contracting extra staff including bus drivers, mechanics, etc. to run and maintain the system.

Additionally, there is concern that if visitors were shuttled to the summit and dropped off before the visitor center opens, visitors would be left to the elements without shelter in case of severe weather. Finally, this environmental assessment is intended to address the problem of summit sunrise overcrowding within a relatively short timeframe, and the implementation of a shuttle system represents a more long-term potential solution to a larger problem of visitor transportation management throughout the summit district and throughout the day. Consideration of a shuttle system is more appropriately analyzed in a comprehensive travel management plan which would address all aspects of transportation in the park. The shuttle system was ultimately dismissed from consideration because it would not meet the purpose and need within the necessary timeframe, and addresses issues that are beyond the scope of this environmental assessment.

## **WHY THE PROPOSED ACTION WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

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

### **1) Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in 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 detail 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 proposed action would result in direct beneficial impacts to human health and safety as there would be fewer vehicles (and fewer overall visitors) at the summit each morning. Fewer vehicles during this period would likely result in fewer motor vehicle accidents and confrontations between visitors, both because of the overall reduction in traffic volume and because visitors may be less inclined to speed or fight over parking spaces if they know there are enough spaces available. Fewer visitors to the summit during sunrise hours should decrease the temptation to walk or climb outside designated areas for better views reducing the likelihood of falls or similar accidents. Fewer visitors should allow for easier access to the restrooms at the Kalahaku overlook and the Haleakalā Visitor Center, resulting in less human waste outside restrooms. Finally, the reduction in the number of vehicles and the size of crowds from the proposed action would reduce the adverse impacts to the safety of employees working in the summit district during sunrise hours. Indirect adverse impacts to summit cultural and natural resources, as well as visitor safety, may result from implementation of the proposed action if its restrictions on sunrise visitation lead to a significant increase in the numbers of visitors at the summit during sunset hours. Impacts resulting from the proposed action are primarily beneficial and direct, and the cumulative impacts to human health and safety in the area would also be beneficial.

### **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).**

A number of federally threatened and endangered species are known to occur or may occur in the vicinity of the project area. The project area includes designated critical habitat for 10 federally listed species, including two birds and eight plants. Critical habitat was designated due to historical populations in the

subalpine shrubland and/or aeolian desert environments within which the project is situated. Implementation of the proposed action would result in direct beneficial impacts to wildlife and/or wildlife habitat as there would be fewer vehicles (and fewer overall visitors) allowed access to the summit each morning. In addition, no floodplains, prime farmlands, wetlands, wild and scenic rivers, or other ecologically critical areas (such as critical habitat or wildlife refuges) would be impacted because no new disturbance would occur as a result of the proposed action.

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

Throughout the environmental process, no identified environmental impacts have been indication controversial. Given the substance and relatively low number of public comments, there is little indication that the impacts on the quality of the human environment would be highly controversial. Some concerns about access for Native Hawaiian cultural practitioners were expressed during public comment periods. As noted, the Proposed Action will not alter the National Park Service's policy of allowing Native Hawaiians access to the park (including the waiving of entrance fees) to conduct traditional cultural practices at sunrise or any other time of day.

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

The proposed sunrise visitation management actions address public safety, provide for visitor enjoyment, and protect the summit area natural and cultural resources. Impacts resulting from the proposed action would primarily be beneficial and direct. However, the cumulative impacts to various resources in the area would likely continue to be negative (see tables 4 and 5 in Chapter 4 of the accompanying environmental assessment). The anticipated impacts to the human environment, as analyzed in the environmental assessment, are not highly uncertain or unique and do not involve unknown risks. Resource conditions in the project area are well known and the anticipated impacts from implementing the proposed sunrise visitation management 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 represents a decision in principle about a future consideration.**

The proposed sunrise visitation management actions 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 proposed action. 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. However, this reservation system may help to provide a general example of a low-impact solution to manage overcrowding in national parks.

**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 small component parts.**

The environmental assessment concluded that the proposed sunrise visitation management actions would result in beneficial impacts but not offset the adverse cumulative impacts for several of the resource topics.

This project 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.**

No historic properties, significant scientific archeological or cultural resources would be impacted. The project areas were surveyed for cultural resources and a determination of no effect was made. The National Park Service submitted a determination of “no adverse effect” to the Hawaii State Historic Preservation Offices and received concurrence on the determination.

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

Following a comprehensive review, the proposed sunrise visitation management 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 proposed action does not violate any federal, state, or local environmental protection laws.

**PUBLIC INVOLVEMENT AND AGENCY CONSULTATION**

The National Park Service released the Haleakalā National Park Sunrise Visitation Environmental Assessment for public review from January 12 to February 20, 2018 and provided a presentation of alternatives to the public in a meeting on January 17, 2018 from 5:00 to 6:30 PM at the Pukalani Community Center. The presentation was designed to solicit public comments addressing a variety of issues relating to the environmental assessment. As with the public scoping earlier in the process (Summer 2017), a newsletter, press release, newspaper notice, public website, park website, and comment forms were provided to the public in order to ensure that participation was wide-reaching and accessible. EnviroSystems, a National Park Service contractor, assisted the National Park Service during one public meeting in presenting alternatives and their potential impacts to the public. Topic specialists assisted with facilitation of the meeting, answered questions regarding methodology and findings of assessment, and assisted with the documentation of public comments. The public meeting included an agenda, sign-in sheet, comment forms, and any other materials that would aid the public review process.

A comment analysis document was prepared and provides a comprehensive analysis of all public comments received in response to the environmental assessment. The coding and aggregation of comments were categorized into separate subjects, 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 by quoting respondents' exact words. The review also provides a traceable, transparent catalogue of public comments without any interpretation.

## **Comments and Issues**

During the Haleakalā Summit Visitation Environmental Assessment public comment period, the National Park Service sought input from the public addressing a variety of issues relating to the alternatives included in the environmental assessment. The public comment period for the environmental assessment occurred from January 12 to February 20, 2018, during which time public comments were encouraged. Seventeen pieces of correspondence were received and entered into the PEPC system during this time. Twelve comments were submitted on the National Park Service website (some comment submissions contained more than one substantive comment), two comments were made by members of the public in newspaper articles about the environmental assessment, and three comments were made in response to those articles. Comments from the two public meetings were summarized and discussed along with the written correspondence items below. For each correspondence item, specific comments within each correspondence were identified and coded by the following topics:

- Alternative modes of transportation
- Provide special access for locals
- Manage reservations for cancellations
- Support proposed action
- Access for the lower parking area
- Sunset visitation issues

### **Summary of main comments and concerns:**

- Many commenters suggested the National Park Service use shuttles or a tram to transport people to view the sunrise at the crater.
- Many commenters suggested special access to sunrise visitation for locals.
- Many respondents commented that the reservation system needed to be modified to include options for cancellations.
- Some commenters support the reservation system as it is and expressed support for the management efforts on behalf of the NPS.
- Some commenters suggested having a separate system to access the lower parking lot.
- Some commenters suggested that sunset also needs to be managed for crowds and subsequent damage to natural resources.

## **U.S. Fish and Wildlife Service**

Section 7 of the Endangered Species Act requires federal agencies to consult with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service when taking an action that may affect federally listed threatened or endangered species or designated critical habitat. In June 2017, a scoping letter was sent to the U.S. Fish and Wildlife Service to inform the agency of the initiation of the environmental assessment.

## **Hawai'i State Historic Preservation Division**

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the impacts of their undertakings on historic properties and to provide state historic preservation officers, tribal historic preservation officers, and, as necessary, the Advisory Council on Historic Preservation a reasonable opportunity to review and comment on the impacts of agency actions. In June 2017, a scoping letter was sent to the State Historic Preservation Division to inform the agency of the initiation of the Environmental

Assessment. In February of 2018 the National Park Service sent a letter to the Hawai'i State Historic Preservation Officer (SHPO) detailing its preferred alternative, summarizing comments from the public comment period pertaining to cultural resources, and seeking concurrence on the Area of Potential Effect (APE) and finding of "no historic properties adversely affected" under 36 CFR Part 800.5(b) of the NHPA. The SHPO sent a response letter on March 30, 2018 (Log No. 2018.00540; Doc. No. 1803SH20 Archaeology) concurring with the finding of no adverse effect.

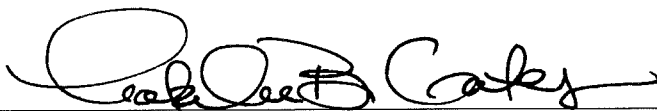
### Cultural Consultation

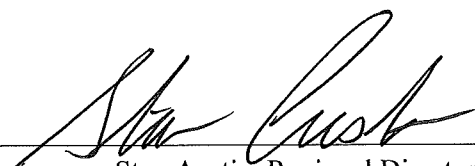
Sunrise Visitor Management was discussed at both the May 3<sup>rd</sup> 2016 and April 21<sup>st</sup> 2017 Kūpuna (elders) Groups meetings. The National Park Service received comments at the Kūpuna Groups meetings including: a reservation system would be advisable; a shuttle system could be enacted; the park was in need of a comprehensive plan as well as ADA parking spaces; the need for safe conditions; a capacity for visitors; and general overcrowding problems. The National Park Service carried out written consultation with 23 organizations and 12 members of its park kūpuna groups under Section 106 of the NHPA. The National Park Service received four responses to its written consultation.

### CONCLUSION

As described above, the proposed action does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement. The proposed action would not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally beneficial impacts that range from localized to widespread, short- to long-term, and negligible to moderate. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative impacts, or elements of precedence were identified. Implementation of the action 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.

Recommended:  September 28, 2018  
Natalie B. Gates, Superintendent Date

Approved:  10/28/18  
Stan Austin, Regional Director Date