



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

**Pu'uhonua o Hōnaunau National Historical Park
Regions 8, 9, 10 and 12**

**FINDING OF NO SIGNIFICANT IMPACT
Remove and Replace Park Maintenance Facilities**

Recommended:

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Date

Approved:

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1. Introduction

The National Park Service (NPS) has prepared an Environmental Assessment (EA) in accordance with the requirements of the National Environmental Policy Act of 1969 (NEPA) to evaluate the impacts of two action alternatives and a no action alternative for the removal and replacement of Park maintenance facilities.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and the associated decision file. To the extent necessary, relevant sections of the EA, which is available at parkplanning.nps.gov/puhorelocmaint, are incorporated by reference below.

2. Selected Alternative and Rationale for the Decision

Based on the analysis presented in the EA, the NPS selects Alternative A – Makai Site (the NPS's preferred alternative) as described on pages 2-2 through 2-6, and page 2-10 of the EA (Sections 2.2 and 2.4). Locations of the proposed action sites (Site 1 and existing maintenance and resource management facilities site) are shown in Figure 1. The selected alternative includes the following elements:

- Demolition of existing fleet vehicle maintenance and storage facilities at site about 2,000 feet northeast/inland of the existing maintenance facilities (i.e., “Site 1”)
- Reconstruction/widening of existing access roads to Site 1 to accommodate emergency and Park fleet vehicles
- Construction of resource management, maintenance, maintenance storage and recycling, covered fleet vehicle parking, fleet vehicle wash, and employee parking facilities at Site 1
- Construction or installation of utility improvements (e.g., fire protection water, wastewater collection, electrical service/distribution lines, telecommunications infrastructure)
- Demolition/deconstruction and removal of existing maintenance and resource management facilities located near the coastline, along with removal of temporary equipment (e.g., canopy tents) and above-ground utilities

Rationale

Alternative A – Makai Site was selected because it meets the project purpose and need and better serves the Park's maintenance and resource management's operational needs when compared with the second action alternative evaluated in the EA (i.e., Alternative B – Mauka Site) and with the No Action Alternative. Alternative A would construct the new resource management and maintenance facilities in much closer proximity to the main Pu'uhonua o Hōnaunau National Historical Park grounds (accessed via a paved road adjacent to the Park entrance vs. three miles inland in Alternative B), with much shorter travel times for staff and fleet vehicles. Consequently, the selected alternative results in operational efficiencies of shorter staff travel times, deliveries of equipment and materials to job sites, and lower fossil fuel emissions when compared with Alternative B. The comparative operational inefficiencies of Alternative B were noted in public and stakeholder comments received during the EA scoping and public review periods (see Appendix A for EA Public Comment Analysis Report). Commenters also raised concerns about adverse impacts on staff presence and visibility in the Park and greater traffic volumes along public roadways used to travel from Site 2 to the main Park resulting from Alternative B. Alternative A would result in fewer impacts on these conditions than Alternative B. When compared with the No Action Alternative, Alternative A will meet the

project's purpose and need by providing safe, modern, and functional facilities for Park maintenance and resource management operations in a suitable location. It will also reduce impacts to cultural resources and the visitor experience by removing buildings that were constructed as temporary facilities from the cultural landscape. Relocating Park maintenance and resource management operations inland will also reduce the exposure of these assets and operations to coastal hazards posed by their current location near the shoreline.

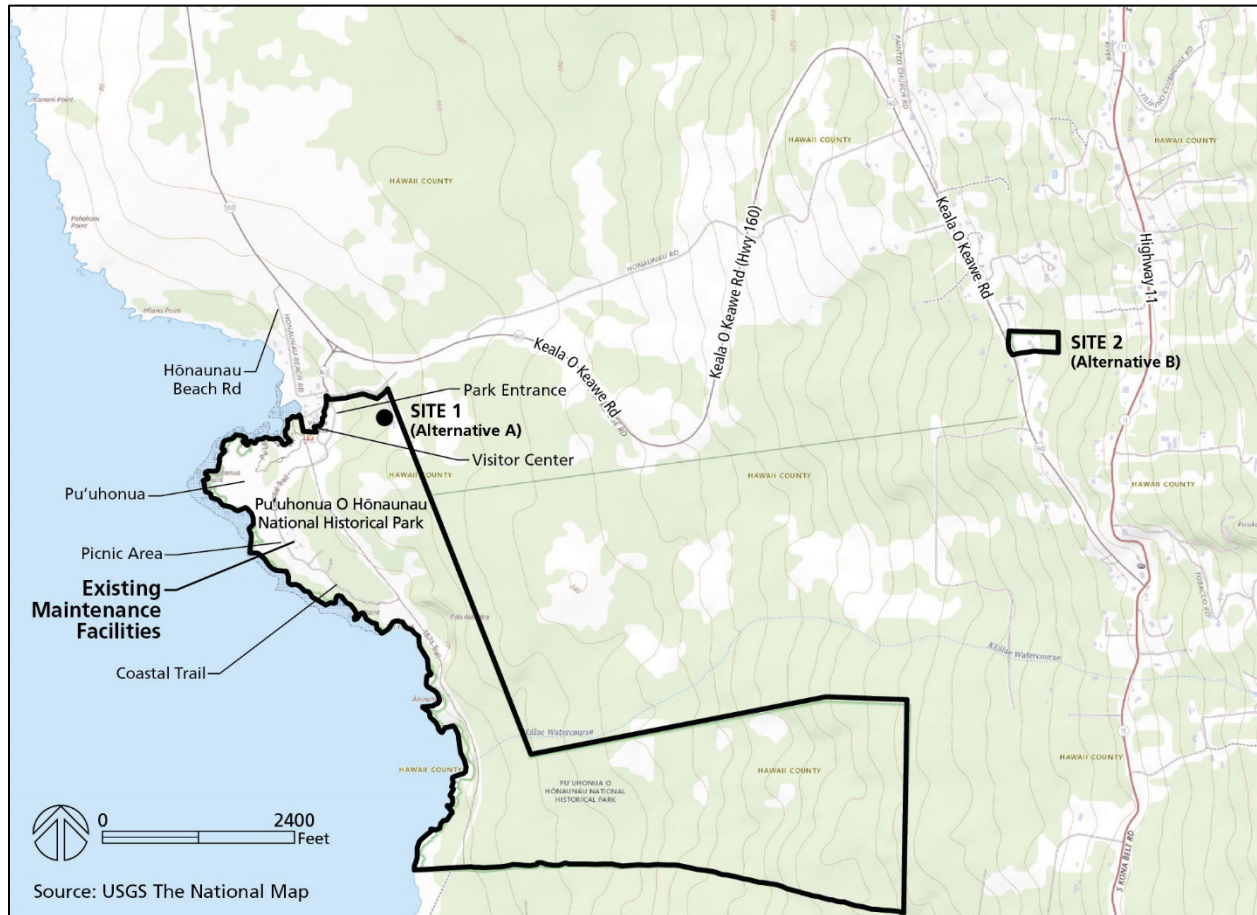


Figure 1. Location Map

3. Mitigation Measures

To avoid, minimize, or mitigate impacts on park resources, the selected alternative incorporates by reference the mitigation measures listed in Appendix A of the EA (and amended as shown in the Errata included as Appendix B of this FONSI). The authority for mitigation for the proposed project comes from the following laws, policies, and consultations:

- NPS Organic Act of 1916 (16 United States Code [U.S.C.] 1)
- NPS Management Policies (NPS 2006)
- Consultations with U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act and Hawai'i State Historic Preservation Officer under Section 106 of the National Historic Preservation Act

4. Other Alternatives Considered

In addition to the selected alternative, this EA analyzed two other alternatives and their impacts on the environment: Alternative B - Mauka Site and Alternative C, the No Action Alternative.

Alternative B: Mauka Site

Alternative B involves construction of maintenance and resource management facilities and related utility improvements at an NPS-owned parcel approximately three miles east of the main Park on Keala o Keawe Road (Highway 160) (see Figure 1). Referred to as “Site 2” or the “mauka” (i.e., upland) site in the EA, the approximately 3.6-acre parcel is currently occupied by three structures owned by the Park (resource management, dormitory, and storage buildings) and an asphalt driveway and parking area. Topography at Site 2 is steeper than at Site 1 and consistently slopes uphill from west to east. This site also contains a regulatory floodway in its northeast corner. Keala o Keawe Road (Highway 160) provides direct access from Site 2 to the main Park, with a travel time of about 10 minutes. Alternative B includes construction of the same development program as the selected alternative, but would potentially require more ground disturbance to create level building pads due to its steeper topographic conditions. As in the selected alternative, Alternative B would also include demolition, deconstruction, and removal of existing maintenance and resource management facilities located near the coastline, along with removal of temporary equipment and above-ground utilities.

Alternative C: No Action Alternative

Under the No Action Alternative, the existing maintenance and resource management facilities that were constructed for temporary use would continue to be used indefinitely. Repairs and minor renovations would be made on an as-needed basis to allow operations to continue within the facilities. Over time, greater levels of investment would be needed to ensure that the facilities meet modern technological and operational requirements and comply with regulatory codes. The No Action Alternative would continue the current inappropriate siting of park facilities within a cultural landscape, and the subjection of the facilities and operations to the risk of storm surge and storm impacts due to the facilities’ coastal location. The No Action Alternative was not selected because it would not meet the project’s purpose and need or project objectives.

5. Public Involvement/Agency Consultation

NPS conducted several public involvement efforts for this project over a two-year period beginning in 2021, described below.

Pre-NEPA Public Engagement

During the pre-NEPA stage of the project, civic engagement took place in Spring and Summer 2021. Activities included virtual and in-person public meetings (July 14, 2021 and July 21, 2021, respectively), distribution of a project newsletter, discussions with the public, and invitations to comment on the Park’s Planning, Environment and Public Comment (PEPC) website.

NEPA Public Scoping and EA Public Review

The NEPA public scoping period extended from October 28 through November 27, 2022. Virtual and in-person public scoping meetings were held on November 9 and 10, 2022, respectively. The project, EA scoping process, and public meetings were publicized on the Park’s website, via a

traditional press release, on a social media platform, and in-person at the Park by means of flyer distribution and display of posters at the Visitor Center.

A formal public comment period on the EA was held from June 13, 2023 through July 13, 2023, beginning with a press release and notice of the availability of the EA issued on June 13, 2023, which also publicized the EA public meeting and comment period. A virtual public meeting was held on June 21, 2023 to provide an opportunity to answer questions the public's questions about the project. Information was posted on the NPS's Planning, Environment, and Public Comment (PEPC) website. Park staff also hosted an in-person public meeting on July 11, 2023 at the Park amphitheater to provide an overview of the proposed action and alternatives, and answer questions.

Hawai'i State Historic Preservation Officer and Native Hawaiian Organizations Consultation

In accordance with the National Historic Preservation Act of 1966, as amended, and Advisory Council on Historic Preservation regulations, NPS conducted Section 106 consultation [36 CFR Part 800.3(c)(3)] with the Hawai'i State Historic Preservation Officer (SHPO). The NPS initiated Section 106 consultation by letter dated September 15, 2022 for the proposed undertaking to remove seven temporary facilities from their present location and construct new permanent replacement facilities in a more suitable location or locations. This correspondence described two action alternatives that were under consideration and described NPS's historic properties identification efforts (i.e., provided a listing of relevant archeological and architectural studies).

The NPS continued the Section 106 consultation through a letter to the Hawai'i SHPO dated April 4, 2023, in which it identified and described a preferred action alternative in detail (i.e., the selected alternative of this FONSI) as the undertaking for Section 106 consideration. This correspondence also identified preliminary areas of potential effect (APEs) for the undertaking's physical, visual, auditory, and atmospheric effects. In its April 2023 correspondence, NPS determined that the seven buildings that make up the existing maintenance facility that would be demolished and removed and the access road that would be improved/modified as part of the undertaking are not eligible for the National Register of Historic Places (NRHP), and requested SHPO's concurrence on this determination.

The NPS continued the Section 106 consultation via a letter to the Hawai'i SHPO dated July 24, 2023, which identified the potential physical, auditory, visual, and atmospheric effects of the undertaking. The NPS determined that a finding of no adverse effect is appropriate for the undertaking and requested SHPO concurrence on the finding.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), NPS consulted with Native Hawaiian Organizations (NHOs) and individuals and 'ohana with traditional ties to the lands the Park encompasses. These efforts began in 2021 and included an information-seeking letter to 55 total individuals and 'ohana dated May 27, 2021 (with follow up letters dated August 27, 2021 and February 1, 2022). Site visits to the proposed project area were held with three interested individuals/'ohana. Invitation letters to consult on the undertaking were sent to seven NHOs. Four NHOs accepted the invitation to consult, and site visits were held with three.

Table 1 summarizes the correspondence related to the Section 106 consultation, outreach to NHOs/individuals/'ohana, and outreach to Park neighbors/potentially interested members of the public.

TABLE 1 SUMMARY OF NHPA SECTION 106, NHOs, 'OHANA, AND INTERESTED PUBLIC CORRESPONDENCE

Recipient(s)	Date(s)	Description
Hawai'i SHPO	September 15, 2022 (accepted by SHPO September 22, 2022)	Section 106 consultation initiation
Hawai'i SHPO	April 4, 2023 (accepted by SHPO April 5, 2023)	Continuation of Section 106 consultation: letter identifying Preliminary APE, requesting concurrence of determination of eligibility for existing maintenance facilities and access road (i.e., "not eligible")
Hawai'i SHPO	July 24, 2023 (accepted by SHPO July 24, 2023)	Continuation of Section 106 consultation: finding of effect letter and concurrence request
Ala Kahakai Trail Association (NHO)	May 27, 2021 August 27, 2021 October 17, 2022 January 27, 2023 June 16, 2023	Consultation initiation Follow up letter Notification of Public Scoping Site visit Notification of Public Comment Period
Kamehameha Schools (NHO)	May 27, 2021 August 27, 2021 October 17, 2022 June 16, 2023	Consultation initiation Follow up letter Notification of Public Scoping Notification of Public Comment Period
Machado-Akana- Aona-Namakaeha Ohana (NHO)	May 27, 2021 August 27, 2021 October 17, 2022 June 16, 2023	Consultation initiation Follow up letter Notification of Public Scoping Notification of Public Comment Period
Na Hoa Aloha o Ka Pu'uhonua o Hōnaunau (NHO)	May 27, 2021 August 27, 2021 October 17, 2022 February 7, 2023 June 16, 2023	Consultation initiation Follow up letter Notification of Public Scoping Site visit Notification of Public Comment Period
Na Kupuna Moku o Keawe (NHO)	May 27, 2021 August 27, 2021 October 17, 2022 June 16, 2023	Consultation initiation Follow up letter Notification of Public Scoping Notification of Public Comment Period
Office of Hawaiian Affairs (NHO)	May 27, 2021 August 27, 2021 October 17, 2022 March 23, 2023 June 16, 2023 August 2, 2023	Consultation initiation Follow up letter Notification of Public Scoping Site visit Notification of Public Comment Period Finding of Effect Summary letter

Recipient(s)	Date(s)	Description
‘Ohana Keaweamahi (NHO)	May 27, 2021 August 27, 2021 October 17, 2022 June 16, 2023	Consultation initiation Follow up letter Notification of Public Scoping Notification of Public Comment Period
Individuals and ‘ohana with traditional ties to the lands the Park encompasses (55 total)	May 27, 2021 August 27, 2021 February 1, 2022	Letter seeking information and two follow up letters
Individuals and ‘ohana with traditional ties to the lands the Park encompasses (55 total)	October 14, 2022 June 13, 2023	Notification of Public Scoping Notification of Public Comment Period
Park neighbors (27 individual households)	October 17, 2022 June 13, 2023	Notification of Public Scoping Notification of Public Comment Period

U.S. Fish and Wildlife Service

On June 6, 2023, NPS initiated informal consultation with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act of 1973 (ESA) (16 USC 1531 et seq.) for one listed reptile species (Green sea turtle [*Chelonia mydas*]), ten listed avian species (Band-rumped Storm Petrel [*Hydrobates castro*], Hawaiian Petrel [*Pterodroma sandwichensis*], Newell’s Shearwater [*Puffinus newelli*], and Hawaiian Hawk [*Buteo solitarius*], Hawaii Akepa [*Loxops coccineus*], Hawaiian Duck [*Anas wyvilliana*], Hawaiian Coot [*Fulica alai*], Hawaiian Goose [*Branta sandvicensis*], Hawaiian Stilt [*Himantopus mexicanus knudseni*], Short-tailed Albatross [*Phoebastria albatrus*], and Hawaiian Hawk [*Buteo solitarius*]), one listed mammal species (Hawaiian hoary bat [*Lasiurus cinereus semotus*]), and one listed invertebrate species (Blackburn’s Sphinx Moth [*Manduca blackburni*]). The consultation also included 14 listed plant species. NPS determined that the selected alternative may affect but is not likely to adversely affect the Band-rumped Storm-Petrel, Hawaiian Petrel, and Newell’s Shearwater and will result in no effect to other listed species included in the consultation. By letter dated September 15, 2023, the USFWS concurred with the NPS determination, which concluded the informal consultation process.

Hawai‘i Office of Planning and Sustainable Development

As required under 15 CFR Part 930, NPS reviewed the selected alternative (Alternative A) to determine whether it would be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the State of Hawai‘i’s approved Coastal Zone Management (CZM) Program, which is administered by the Hawai‘i Office of Planning and Sustainable Development (OPSD). NPS determined that the proposed activity will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the Hawai‘i CZM Program and requested review by OPSD of its consistency determination on May 11, 2023. A public notice of the consistency review was published on May 23, 2023 in OPSD’s semi-monthly online publication, *The Environmental Notice*. By letter dated July 20, 2023, OPSD conditionally concurred with NPS’s consistency determination, subject to five conditions concerning project implementation, water quality standards, water pollution controls, threatened and endangered species mitigation measures, and historic preservation consultation.

6. Finding of No Significant Impact

As noted on page 3-2 of the EA, issues were retained for consideration and discussed in detail in the EA if:

- the environmental impacts associated with the issue are central to the proposal or of critical importance;
- a detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- the environmental impacts associated with the issue are a significant point of contention among the public or other agencies; or
- there are potentially significant impacts to resources associated with the issue.

Issues and impact topics that were dismissed from detailed EA analysis and the rationale for their dismissal are included in Appendix B of the EA. These impact topics do not have significant adverse effects on the human environment.

As described in Chapter 3 of the EA, the selected alternative has the potential for adverse impacts on biological species of special concern or their habitat, archeological resources, cultural landscapes, Native Hawaiian concerns, and transportation facilities. However, no potential for significant adverse impacts was identified during the environmental assessment process, as described below. No highly uncertain or controversial impacts, unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS-selected alternative will not violate any federal, state, or local environmental protection law.

Biological Species of Special Concern or Their Habitat

The project will have no direct impacts on species of special concern or their habitat during project construction or operations, as none exist at the selected alternative project area. However, there may be indirect adverse impacts on biological species of special concern or their habitat. Impacts on protected avian species that may overfly the project areas are unlikely as the project areas do not represent unique habitat within the Park and there is no nesting habitat for any listed or protected seabird species on or close to the proposed action site. Construction will occur primarily on previously disturbed and cleared or developed areas and will not directly impact habitat use by any protected species. Indigenous migratory shorebird species that may occasionally use loafing and foraging habitat at or close to the project site may be adversely affected by construction and operational activities. However, increases in noise levels from construction activities to the ambient noise environment will be negligible and temporary. Construction activities will not further threaten the existence of any protected species or critical/sensitive habitats. Operational period noise and activity will increase at the project site, but decrease at the existing maintenance facility site close to the coastline.

There is potential for subsurface lava tubes to be discovered during installation of the foundation pilings for the new facilities. If present, these tubes could contain unique biological resources; however, Mitigation Measure Bio 5 in Appendix B of this FONSI will address potential impacts.

Mitigation Measures Bio 1 through Bio 18 in the Errata for EA Appendix A (included as Appendix B of this FONSI) will avoid, minimize, and mitigate potential adverse effects to biological resources,

including protected species. The EA found no significant adverse impacts to biological species of concern or their habitat.

NPS has conducted informal consultation with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act. NPS determined that the selected alternative may affect but is not likely to adversely affect the Band-rumped Storm-Petrel, Hawaiian Petrel, and Newell's Shearwater and will result in no effect to other listed species that may occur in the Park vicinity (e.g., Green sea turtle [*Chelonia mydas*], Hawaii Akepa [*Loxops coccineus*], Hawaiian Duck [*Anas wyvilliana*], Hawaiian Coot [*Fulica alai*], Hawaiian Goose [*Branta sandvicensis*], Hawaiian Stilt [*Himantopus mexicanus knudseni*], Short-tailed Albatross [*Phoebastria albatrus*], Hawaiian Hawk [*Buteo solitarius*], Hawaiian hoary bat [*Lasiurus cinereus semotus*], and Blackburn's Sphinx Moth [*Manduca blackburni*]), including any listed plant species. By letter dated September 15, 2023, the USFWS concurred with the NPS determination that the selected alternative may affect but is not likely to adversely affect the Band-rumped Storm-Petrel, Hawaiian Petrel, and Newell's Shearwater and will result in no effect to other listed species included in the consultation. Therefore, the selected alternative will not result in significant adverse impacts to species of special concern or their habitat.

Archeological Resources

Extensive archeological inventory surveys were conducted at Site 1 to assist in identifying suitable locations for new construction and to analyze potential impacts of the alternatives. The survey areas extended well beyond the potential construction footprints in order to understand the area's broader archeological context, and identified formal and informal archeological features.

Preliminary facility design plans at Site 1 make maximum use of previously disturbed and developed areas. Where the facility/associated development cannot be fully sited within previous disturbance, by project design, structures and all associated surface disturbance will avoid known archeological features by no less than 15 feet (see Mitigation Measure CR 2 in Appendix B of this FONSI).

Implementation of this design requirement will effectively avoid adverse impacts to all known/identified archeological resources. However, construction activities for the selected alternative could result in inadvertent discovery of archeological resources. Response and treatment of such discoveries will be guided by an Archeological Monitoring Plan and a Native American Graves Protection and Repatriation Act (NAGPRA) Plan of Action. These two documents will collectively guide any necessary treatments, analysis, and disposition of resources discovered during construction, and will be completed prior to any ground disturbing activities (see Mitigation Measures CR 3 and CR 5 in Appendix B of this FONSI). In addition, an archeological monitor will be required to be on-site during any ground disturbing activities (see Mitigation Measure CR 4 in Appendix B of this FONSI). These project requirements will effectively minimize any adverse impacts resulting from inadvertent resource discovery.

Given the required design criteria described above, the selected alternative will likely result in minor adverse impacts to archeological resources if any are inadvertently discovered during construction. Therefore, the selected alternative will not result in significant adverse impacts on archeological resources.

As described earlier in Section 5, NPS has consulted with the Hawai'i SHPO under Section 106 of the NHPA (see Table 1 for summary of correspondence). NPS determined that, with the implementation of mitigation measures, the selected alternative will have no adverse effect on historic properties.

Cultural Landscapes

The project will result in beneficial impacts to cultural landscapes through the removal of the existing maintenance facilities from their current location; the site will then more closely resemble the area's historic setting and appearance.

The project will likely result in minor adverse impacts to cultural landscapes at Site 1 from introducing new structures into the landscape. The existing wastewater treatment and vehicle wash facilities at the site currently interrupt the surrounding cultural landscape with modern visual elements. Although the proposed new facilities will have a larger overall footprint than the existing buildings and infrastructure at Site 1 (that will be demolished/replaced), the new structures will be largely screened from view by existing vegetation and topography. There will likely be some limited visibility of the new facilities from locations within the Visitor Center cultural landscape (e.g., partial rooftop views through moderately dense vegetation at a distance of around 800 feet). Similar views may also be possible from northern portions of the Royal Grounds, although these views will be at a distance of 1,500 feet and be additionally screened by the Park Visitor Center and amphitheater buildings in the foreground. The proposed access road improvements will have minimal impacts to the cultural landscape as there will be only surface and below grade changes (i.e., no vertical elements are currently planned, but could be incorporated if required). These minor changes to the viewscape will not substantially alter the existing landscape character or viewer experience. Therefore, the selected alternative will not result in significant adverse impacts to cultural landscapes.

Native Hawaiian Concerns

The selected alternative will beneficially impact the cultural landscape through the removal of the existing maintenance facilities. Construction of the new facilities and demolition/deconstruction of the existing facilities will have potential minor adverse construction period impacts on Native Hawaiian concerns due to noise and activity, which could adversely impact cultural and spiritual practices in the Park. However, construction activities will be temporary and short-term. Archeological features known to be culturally and spiritually important to Native Hawaiians with lineal and cultural ties to Hōnaunau identified near Site 1 will be protected from direct or indirect impacts during project construction and operations. These protections will be required by project design, see Mitigation Measure CR 2 (see Appendix B of this FONSI). In case of inadvertent discovery of cultural resources or human remains, response and treatment will be guided by an Archeological Monitoring Plan and a NAGPRA Plan of Action. These two documents will be developed in consultation with Native Hawaiian Organizations and individuals/‘ohana, and will collectively guide any necessary treatments, analysis, and disposition of resources discovered during construction (see Mitigation Measures CR 3 and CR 5 in Appendix B of this FONSI). Access to these sites and features will be maintained during the construction and operational periods; see Mitigation Measure CR 8 in Appendix B of this FONSI. During the operational period, the integrity of Native Hawaiian cultural and spiritual practices and experience will be retained, as existing practices will continue within the main Park unaffected by activities at the new maintenance facility site, and such activities in the vicinity of the current maintenance facility will be enhanced by its removal. The visual impacts to sites important for traditional Hawaiian practices and cultural activities will be minimal.

Consultation with the Native Hawaiian community on this project and the alternatives under consideration has been ongoing since 2021. Those consulted have been supportive of the project objectives and purpose and need. Several individuals raised concerns about Alternative A (the selected alternative) and the proximity of the proposed construction to archeological features nearby. Archeological studies undertaken in the vicinity of Site 1 confirm that features known to be

of religious and cultural significance to Native Hawaiians are in close proximity to the project site. Protecting these features from harm through avoidance and buffers and ensuring continued access to these spaces were both important issues discussed during consultation. Mitigation Measures CR 1 through CR 6 and CR 8 through CR 9 in Appendix B of this FONSI will be implemented to address Native Hawaiian concerns. Therefore, the selected alternative will not result in significant adverse impacts to Native Hawaiian concerns.

Transportation Facilities Impacts

The selected alternative is expected to result in temporary, minor impacts on transportation facilities. This alternative is not intended or expected to increase the Park's visitor capacity or visitor trips (motor vehicle, bicycle, or pedestrian). During construction, there could be an additional 40 or so construction crew POVs along with construction vehicles and equipment accessing Site 1. Construction activities are expected to begin well before the heaviest volume of visitor arrivals and construction crew-related traffic impacts on queuing at the Park entrance on public roadways are expected to be minimal. Construction equipment transport will occur infrequently through the construction period and could be scheduled to arrive at off-peak times. Specific parking areas for construction contractor employee POVs will be identified in coordination with the Park to ensure adequate availability of Park staff and visitor parking. See Mitigation Measures TF 1 through TF 5 in Appendix B of this FONSI for mitigation measures to address adverse traffic and parking impacts.

During the operational period, there will be minimal increase in operational vehicle trips on the access road between Site 1 and the Park entrance and no impacts on Keala o Keawe Road. Staff arrival and departure times will generally not overlap with the heaviest visitor arrival period. Because the fleet vehicles and equipment will now be staged outside the Park entrance, some trips by these vehicles may occasionally increase queuing at the entry booth. However, fleet vehicles will generally remain within the main Park areas during work hours and their ingress into the Park will be rapid because no payment transaction will be made at the booth. Therefore, the selected alternative will not result in significant adverse impacts to transportation facilities.

Current and future access to Site 1 is via a paved road located just north of the Park's entrance, which is aligned east-west on privately owned land. The NPS is currently working on a long-term agreement for use of the privately-owned road providing access to Site 1.

Degree to Which the Selected Alternative Affects Public Health and Safety

The selected alternative is expected to result in reducing risks to public health and safety by removing occupied Park resource management and maintenance facilities in an area that is subject to coastal hazards and relocating those operations and functions about 2,000 feet inland.

Effects That Would Violate Federal, State, Tribal, or Local Law Protecting the Environment

The selected alternative will not violate any federal, state, or local environmental protection law.

7. Conclusion

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Appendix A:
Response to Substantive Public Comments



**Pu‘uhonua o Hōnaunau National Historical Park
Hawai‘i**

PUBLIC COMMENT ANALYSIS REPORT

PROJECT: PUHO – REMOVE AND REPLACE PARK MAINTENANCE FACILITIES

PMIS Number: 154441

PEPC Project Number: 10339

Date: September 7, 2023

Summary of public comments received during Environmental Assessment (EA) public comment period between June 13, 2023 and July 13, 2023.

This document summarizes the comments received by Pu‘uhonua o Hōnaunau National Historical Park (the Park) in relation to the EA for the proposed project to remove and replace Park maintenance facilities.

INTRODUCTION

The National Park Service (NPS) involves the public in decisions that would have environmental impacts and where (1) the public has an identifiable interest or is likely to be interested, (2) there may be applicable knowledge or expertise likely to be available only through public consultation, or (3) there are complex or potentially controversial issues. One way the NPS involves the public in its decision making process is by making EAs available for public review and comment. After the EA public review period ends, the NPS uses an established protocol to analyze and summarize the public comments received during the engagement period. This document describes the EA public review process for the project to remove and replace Park maintenance facilities at Pu‘uhonua o Hōnaunau National Historical Park and presents a summary of public comments received, concern statements, representative quotes from comments, and NPS responses.

PROJECT DESCRIPTION

NPS proposes to relocate existing maintenance and resource management functions from their current location in substandard facilities near the coastline to new facilities at a suitable location elsewhere in the Pu‘uhonua o Hōnaunau National Historical Park in Hawai‘i County, Hawai‘i.

The purpose of the project is to: (1) provide safe, modern, functional facilities for Park maintenance and resource management operations in a suitable location that also minimizes impacts to the cultural landscape; (2) reduce impacts to resources and improve the Park experience by removing “temporary” buildings from the cultural landscape; and (3) reduce the risks of coastal hazards and sea level rise on Park operations and assets posed by their current proximity to the shoreline. Two action alternatives involving constructing new maintenance facilities at other NPS-owned sites and the No Action Alternative are analyzed in the EA for their potential effect on environmental resources.

- Alternative A places all new facilities at Site 1 in the northeast corner of the Park, within the main Park boundary but accessed via a privately-owned road.
- Alternative B places all new facilities at Site 2, a parcel on Keala o Keawa Road 3 miles east of the main Park.

- During the EA scoping period in October and November 2022, a third site (“Site 3”), a previously disturbed road cut site within the Park, was initially considered for use in both action alternatives but was removed due to potential adverse visual and direct effects and in response to feedback received in consultation with Native Hawaiian organizations.

PUBLIC COMMENT PERIOD

A press release and notice of the availability of the EA, and its associated public meeting and comment period were issued on June 13, 2023. The comment period was open from the publication of the EA on June 13, 2023 through July 13, 2023. A virtual public meeting was held on June 21, 2023 to provide an opportunity to answer questions the public’s questions about the project. Information was posted on the NPS’s Planning, Environment, and Public Comment (PEPC) website at <https://parkplanning.nps.gov/puhorelocmaint>.

During the open comment period, seven pieces of correspondence were received in PEPC and five via email. The following table shows the distribution of correspondence by state; all correspondence were received from the U.S.

Table 1. Correspondence by State

State	Number of Correspondence
Hawai‘i	10
California	1
North Carolina	1

The correspondences contained 27 individual comments, which were categorized into seven codes summarized in Table 2.

Table 2. Comment Codes and Percentage Breakdown

Code	Code Description	Number of Comments	Percentage of All Comments
CR	Cultural Resources	6	22%
FH	Flood Hazard	1	4%
PD	Project Design	2	7%
PO	Park Operations	4	15%
TE	Threatened and Endangered Species	1	4%
TF	Transportation Facilities	1	4%
OS	Out of Scope or Not Applicable	8	30%
PDD	Previously Discussed & Dismissed from Further Consideration	4	15%
	TOTAL	27	100%¹

The following section presents Concern Statements developed for the substantive issues raised by comments that were received, organized by the seven code categories. Representative verbatim quotes excerpted from the comments are also presented along with NPS responses.

¹ The total of the individual percentages shown in Table 2 does not equal 100% due to their rounding to the nearest whole number; percentages ending in decimals of 0.5 and above were rounded up and percentages below 0.5 were rounded down.

CR- Cultural Resources

Concern Statement: Construction activities would be more invasive with Alternative B due to the need for utilities trenching and a 2-1/2 year longer duration.

Representative Quote: “Alternative B would require extension and upgrading of the electrical power, potable water, and sewer systems. This work would likely include new TRENCHING and RECONSTRUCTING existing underground services. The construction duration would last 2 ½ years longer and appears to be more invasive, like trenching and reconstructing underground services.”

NPS Responses:

1. NPS appreciates the commenter’s concern with the potentially greater impacts of construction activities from Alternative B and notes that Alternative A (Site 1) is NPS’s preferred alternative.
2. As described in EA Section 2.3.3 (page 2-9), the estimated construction duration for Alternative B would range from two to six months longer than Alternative A (not 2-1/2 years longer), depending on many factors.
3. Subsurface trenching for utilities would be required in both project action alternatives.

Concern Statement: Alternative B could result in adverse impacts on cultural resources due to reduced staff presence within the Park from the inefficiency of traveling from offsite location (Site 2).

Representative Quote: “The park needs more employee presence in the park in order to protect our park's resources and having the new maintenance facilities built up at the dorm site will cause the park to not have as much employee presence in the park and therefore jeopardize the resources of this wahi pana.”

NPS Responses:

1. NPS appreciates the commenters’ concerns on Alternative B’s potential impacts on cultural resources; NPS notes that Alternative A (Site 1) is its preferred alternative.
2. The buildings to be removed by the proposed action currently house both maintenance and resource management staff and both alternatives would remove staff buildings from the coastal area.
3. Both alternatives would result in reduced NPS staff presence in the coastal area after the construction of new facilities is completed and staff relocate to the new facilities, particularly in the morning when they report to duty and evening prior to departure. However, maintenance staff would continue their current maintenance activities within all areas of the Park under both alternatives and the project would not affect the presence of other NPS staff within the park and Hōnaunau Historic District during the Park’s normal business hours (e.g., law enforcement rangers, administrative staff, interpretive staff, and staff at the entry gate).
4. Protection of cultural resources is among the highest priorities of all Park staff and would continue under either alternative. NPS will observe the needs of the park and visitors during and after construction. If operational adjustments are needed, including adjustments to staff visibility, changes will be made to the park's management strategies, as appropriate.

Concern Statement: Site 1 is in close proximity to known archaeological features, which may be of greater importance than the resources at the existing maintenance facility site.

Representative Quote: “Several individuals raised concerns about Alternative A and the proximity of the proposed construction to archeological features nearby. Archeological studies undertaken in the vicinity of Site 1 confirm that features known to be of religious and cultural significance to Native Hawaiians are in close proximity to the Site. And is it possible that Site 1 is more important than the existing site and its resources?”

NPS Responses:

1. NPS appreciates the commenter's concern with Alternative A's potential impacts on archaeological features known to be in proximity to Site 1. The majority of the Site 1 project area would be on previously disturbed land and mitigation measures described in EA Appendix A (e.g., no ground disturbance within a minimum 15-foot buffer from identified archeological features) would protect these features from adverse effects.
2. Archeological features in and near the current maintenance facility as well as those near the proposed project area at Site 1 are considered contributing resources to the Hōnaunau Historic District.

FH - Flood Hazard

Concern Statement: Climate change may affect the floodway boundary limits at Site 2.

Representative Quote: "Site 2 does not seem to present the cultural issues of the other sites, but one does note that, given the expected climate change impacts, the existing flood hazard boundary might be altered in the future."

NPS Response:

1. NPS appreciates the commenter's concern with how the floodway boundary at Site 2 may change in the future and notes that Alternative A (Site 1) is its preferred alternative. Detailed engineering studies and formal delineation of the regulatory floodway would be conducted during detailed design, including allowances for predicted impacts of climate change, and all new facilities would be sited outside the regulatory floodway in the northeast corner of Site 2 (as noted in Section 2.3.1 of the EA, on page 2-9).
2. In 2021, an archeological inventory survey was conducted at Site 2 to assist in identifying suitable locations for new construction and to analyze potential impacts of the alternatives. The survey areas extended well beyond the potential construction footprints in order to understand the area's broader archeological context, and no archeological features were identified.

PD – Project Design

Concern Statement: NPS should consider materials management practices during project implementation to support federal sustainability goals and reduce greenhouse gas emissions (e.g., waste management and reduction strategies, reuse and recycling of deconstructed building materials, use of recycled content products).

Representative Quote: "The EPA encourages deconstruction and reuse of materials, if possible, rather than incineration or landfill disposal. This is supported by EPA's Materials Management Hierarchy, which prioritizes reuse above recycling and composting."

NPS Response:

1. NPS supports federal sustainability goals and will incorporate materials and waste management requirements in contractor specifications, as appropriate.

Concern Statement: Removing the existing maintenance facilities from their current site before future "preservation" of the site occurs in the future may also remove protection from coastal flooding provided by the existing facilities.

Representative Quote: "One understands that there is a concrete slab which will remain and many of the structures are post on pier, the question is what happens when the area is thus more open to any storm events flooding, etc.? There is the stated intention for "Preservation treatment and future interpretation at the existing site." However, the preservation actions should be

part of this plan, so there is not an exposed interval during which storms, etc., would impact the newly open site.”

NPS Responses:

1. NPS appreciates the commenter’s concern with potential impacts on underlying archeological resources from the project’s removal of existing resource management and maintenance structures from their coastal location prior to identifying future preservation actions at the site.
2. The Park regards sea level rise as inevitable and recently published studies concerning the park indicate that all coastal areas of the park without high cliffs will be periodically flooded by ocean water.
3. The Park has not yet undertaken a formal planning process to evaluate impacts of adaptive preservation strategies that may be deployed to address sea level rise or other climate change impacts. However, the current structures on the shoreline may be hazardous in the future and likely to interfere with natural processes or revegetation that could postpone damage caused by erosion.
4. Current facilities offer little protection to underlying resources coastal flooding, and their removal is not likely to exacerbate flood-related impacts. Future preservation and interpretation actions at the existing maintenance facility site are unlikely to include the introduction of structures that would create a hardened barrier to potential coastal flooding events, but rather, the preservation in place (i.e., non-disturbance) of subsurface archeological resources along with interpretive material.
5. Specific elements of these initiatives will be developed through a careful planning process involving Native Hawaiian cultural stakeholders. After deconstruction of the existing maintenance facilities, interim measures include returning the site to an undeveloped state, potentially with vegetative cover to reduce erosion risk.

PO – Park Operations

Concern Statement: Relocation of Park staff to Site 2 would adversely affect the visitor experience, reduce the staff’s deterrent effect on criminal & unsafe behavior at the Park, result in operational inefficiencies, and increase response time to Park emergencies.

Representative Quote: “...the removal of ~19 staff would decrease park presence dramatically in an area where (sometimes) one VRP staff is available to make sure that the visitors got any help needed as well as some interpretive information, resource protection information and coastal water safety instruction.”

Representative Quote: “Presence is also important to display and expect respectful behavior, and presence also detracts from theft, property damage and other real and potential crimes.”

Representative Quote: “Keala o Keawe Road provides direct access to Site 2, three miles east from the main Park, with a travel time of about 10 minutes. Response time to Park emergencies will be much longer and therefore much less effective with the off-site location, especially if access is blocked by the queuing!”

NPS Responses:

1. NPS appreciates commenters’ concerns with the potential effects of Alternative B on the Park’s operational efficiency, visitor experience, crime deterrence, and its emergency response time, and notes that Alternative A is NPS’s preferred alternative.
2. The buildings to be removed by the proposed action currently house both maintenance and resource management staff; both alternatives would remove these buildings from the coastal area.
3. Both alternatives would result in reduced NPS staff presence in the coastal area after the construction of new facilities is completed and staff relocate to the new facilities, particularly in

the morning when they report to duty and evening prior to departure. However, neither alternative would affect the duties or location of other NPS staff within the park and the Hōnaunau Historic District during the Park's normal business hours (e.g., law enforcement rangers, administrative staff, interpretive staff, and staff at the entry gate).

4. Protection of cultural resources is among the highest priorities of all Park staff and would continue under either alternative. NPS will observe the needs of the park and visitors during and after construction. If operational adjustments are needed, including adjustments to staff visibility within the Park, changes will be made to the Park's management strategies, as appropriate.
5. Park management actively addresses the public safety issues and protection of archeological resources within Park grounds and will continue these efforts under either alternative.
6. If Alternative B is implemented, there would be greater time spent in-transit from the new fleet facilities at Site 2 compared with Site 1; scheduling and coordination changes could be employed to minimize inefficiencies.
7. While Hawai'i County Police and Fire Departments have primary responsibility for criminal incidents and Fire/Emergency Medical response in Hawai'i County, the Visitor and Resource Protection (VRP) law enforcement rangers will continue to respond to all incidents at the park and provide immediate law enforcement and EMS/Fire response. The law enforcement rangers will continue to respond from within the Park, not from the new facility. Their duty station and office in the Park will not change under either Alternative A or B. The VRP team also investigates and enforces all natural and cultural resource violations in the Park and proactively patrols all areas of the Park.

TE – Threatened and Endangered Species

Concern Statement: Construction and operational activities and project physical features such as tree trimming, barbed wire, artificial lighting, vegetation removal, and construction operations may adversely impact Federal and State-listed threatened and endangered species or their habitat that may occur in or near the project area.

Representative Quote: “The endemic pueo or Hawaiian Short-Eared Owl (*Asio flammeus sandwichensis*) could potentially nest in the project area. Before any potential vegetative alteration, especially ground-based disturbance, we recommend that line transect surveys are conducted during crepuscular hours through the project area. If a Pueo nest is discovered, a minimum buffer distance of 200 meters from the nest should be established until chicks are capable of flight.”

Representative Quote: “The State listed ‘io or Hawaiian Hawk (*Buteo solitarius*) may occur in the project vicinity. Prior to undertaking vegetation clearing, DOFAW recommends that pre-construction surveys of the area be conducted by a qualified biologist following appropriate survey methods (Gorressen et al., 2008) to ensure no Hawaiian Hawk nests are present, which may occur during the breeding season from March to September. The survey should be conducted at least 10 days prior to the start of construction. If an ‘io nest is detected, a buffer zone of 100 meters (330 feet) should be established around it where no construction shall occur until the chick or chicks have fledged, or the nest is abandoned, and DOFAW staff should be immediately notified. If adult individuals are detected in the area during construction, all activities within 30 meters (100 feet) of the bird should cease. Work may continue when the bird has left the area on its own.”

Representative Quote: “The proposed project work occurs near anchialine ponds, a situation that could affect endangered native Hawaiian damselflies (*Megalagrion* spp.) and anchialine shrimp species. These species include *Vetericaris chaceorum* and *Procaris hawaiana*, which may potentially occur in these water features at the project site. DOFAW, therefore, recommends a survey be conducted by a qualified entomologist to determine if listed damselflies are present in the project area and to assess any potential impacts to those species.”

Representative Quote: “The project area is within the range of the State listed Blackburn’s Sphinx Moth (*Manduca blackburni*) or BSM. Larvae of BSM feed on many nonnative hostplants, which include tree tobacco (*Nicotiana glauca*), that grow in disturbed soil. We recommend contacting the Hawai’i Island Branch DOFAW office at (808) 974-4221 for further information about where BSM may be present and whether a vegetation survey should be conducted to determine the presence of plants preferred by BSM. DOFAW recommends removing plants less than one meter in height or during the dry season to avoid harm to BSM. If you intend to either remove tree tobacco over one meter in height or to disturb the ground around or within several meters of these plants, they must be thoroughly inspected by a qualified entomologist for the presence of BSM eggs and larvae.

Representative Quote: “DOFAW recommends that a botanical survey be conducted by a qualified botanist in all proposed affected areas prior to commencing work to determine if any rare or endangered plants are present in the project area.”

NPS Response:

1. NPS appreciates DOFAW’s comments on protected species and has conducted consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The NPS evaluated the potential impacts on Federal and state-listed threatened and endangered species and their habitat in or near the project area and determined that the Proposed Action may affect but is not likely to adversely affect the Band-rumped Storm-Petrel, Hawaiian Petrel, and Newell’s Shearwater and will result in no effect to the other listed species. In addition, best management practices (BMPs) and mitigation actions will be implemented to avoid or minimize adverse impacts to protected species, as appropriate to the proposed action and its anticipated impacts.
2. An errata sheet to the EA will include BMPs and mitigation actions identified by the Hawai’i Department of Land and Natural Resources in its EA comment letter dated June 28, 2023 that were not included in the June 2023 EA, as appropriate to the proposed action and its anticipated impacts.
3. Pueo are affected by ground-based vegetation disturbance and nest year-round. NPS appreciates DOFAW’s recommendation to conduct pueo nest surveys prior to vegetation disturbance. However, the proposed action would occur mostly on previously disturbed areas and paved areas, or directly adjacent to previously disturbed areas. Based on this and expertise of park biologists, the proposed action would have no effect on pueo and further mitigations are not necessary.
4. A pre-clearing survey for nesting Hawaiian Hawk is included as Mitigation Measure Bio 3 in Appendix A of the EA.
5. NPS appreciates DOFAW’s comments on anchialine habitats and has considered potential impacts on these habitats. The nearest anchialine habitats are 130 feet (about 40 meters) away from the nearest structures slated for demolition, and no anchialine habitats are proximate to either of the proposed construction sites at Sites 1 or 2. Application of mitigation measures for biological species of special concern or their habitat listed in Appendix A of the EA would further avoid or minimize potential adverse impacts to damselfly and anchialine shrimp populations that may occur in the anchialine ponds (e.g., mitigation measures Bio 1, Bio 4, Bio 10, Bio 11, Bio 12, and Bio 13).
6. NPS appreciates DOFAW’s comment on potential presence of BSM in the project area and has considered potential impacts to the species. A 2022 biological survey did not observe potential host plants for BSM (see EA Section 3.2.3, page 3-4) and NPS has determined that the proposed action would result in no effect to BSM; therefore, further mitigations are not warranted.
7. NPS appreciates DOFAW’s recommendation to conduct a botanical survey and notes that a biological survey (including for botanical resources) was conducted for the project in 2022. The results of the survey were reported in the project’s June 2023 EA (Section 3.2.3, page 3-4) .

TF – Transportation Facilities

Concern Statement: Current vehicle traffic volumes on Highway 11 are greater now than reported in EA (2023 informal anecdotal data vs 2021 Hawai'i Department of Transportation [HDOT] data) and Alternative B (Site 2) will result in higher vehicle volumes on affected roadways.

Representative Quote: “State of Hawai'i 2021 AADT STATS counted 1,600 vehicles (annual average daily traffic) and we know that it is more now. My husband was helping someone 9 miles (mm102) from my home in Keōpuka (mm111) and no matter what time of day, he counted >200 vehicles on Hwy 11, So Kona for 15 minutes. That's 800 vehicles per hour, x times 8 hours? The possibility of an annual average daily traffic number of 6,400 vehicles on Hwy. 11????”

NPS Response:

1. NPS appreciates the commenter's concern with potential traffic impacts related to Alternative B and notes that the EA reported AADTs for Highway 160, which has lower volumes than Highway 11 (EA pages 3-14 and 3-15). HDOT 2021 AADTs for Highway 11 in the vicinity of its intersection with Highway 160 range from 6600 to 7600, which is greater than what is described in the comment.
2. As stated on page 3-17 of the EA, under Alternative B, estimated Park-related vehicle trips on Keala o Keawe Road between Site 2 and the Park entrance would represent a small percentage of the overall number of vehicles using the roadway.

OS – Out of Scope or Not Applicable

Out of scope comments or comments that were not applicable/not requiring a response included:

- Make ungulate management a priority
- Retain temporary building for staff breaks (does not address the project's purpose and need)
- Support/appreciation for the project

PDD – Comments Previously Discussed and Dismissed from Consideration

Several EA comments were received that were discussed previously in the project's pre-design phase; some of these comments were dismissed from consideration for various reasons. They include the following:

- Build a permanent bathroom structure at the existing maintenance facility site
- Use Site 3 for materials storage
- Create a backtrail service road for staff use between Site 1 and Park grounds
- Use of Site 3 for the new facilities would be problematic

CONCLUSION

The majority of substantive comments submitted during the EA public review period pertained to cultural resources (25 percent of all comments), followed by comments related to park operations. Most of the comments on cultural resources and park operations raised concerns about Alternative B. Nearly one-half the comments were either out of scope or not applicable/do not require a response (43 percent).

Appendix B:
Errata Indicating Text Changes to EA

ERRATA INDICATING TEXT CHANGES TO EA

The NPS reviewed public comments on the EA and determined that the following text changes to were needed in Appendix A Mitigation Measures. Text that has been removed are in ~~strikeout~~ and text that has been added are shown with double underline. Errata text changes only affect the mitigation measures table presented in Appendix A of the EA.

Impact Area	Mitigation	Lead/ Responsible Party
Biological Species of Special Concern or Their Habitat (Bio 1)	Protection of existing vegetation; diversion of surface water and control of dewatering discharge; sandbag barriers; and stabilized construction ingress and egress points.	Construction Contractor
Bio 2	No trees <u>woody plants</u> 15 feet or taller on the project site would be <u>disturbed, removed, or trimmed</u> between June 1 and September 15 to avoid potential disturbance during pupping season to the endangered hoary bat.	NPS Construction Monitor
Bio 3	If large stature trees over 15 feet high are present in the project site, a pre-clearing nesting Hawaiian Hawk survey will be conducted by a qualified biologist to ensure that no active hawk nests will be disturbed.	NPS Construction Monitor
Bio 4	Construction mitigation measures would be put in place during construction to avoid impacts to special status species with the potential to occur in the project areas.	NPS Construction Monitor
Bio 5	In the unlikely event that a lava tube is encountered during installation of foundation footings, work would cease until the lava tube is assessed for biological resources and necessary mitigation measures are identified.	NPS Resource Staff
Bio 6	If removal of native or endangered plants is necessary at Site 2, minimization measures would include replanting new nursery-grown specimens (from seeds obtained from the trees onsite if possible).	NPS Resource Staff
Bio 7	Nighttime construction activities would be avoided to the extent practicable.	NPS Construction Monitor
Bio 8	<u>Install automatic motion sensor switches and controls on all outdoor lights or turn off lights when human activity is not occurring in the lighted area.</u> Project-related outdoor lighting would be downward facing <u>and fully shielded</u> .	NPS Design Team
Bio 9	No barbed wire would be used on fencing or new structures.	NPS Design Team

Impact Area	Mitigation	Lead/ Responsible Party
Bio 10	Project materials, vehicles, machinery, and equipment must be pressure washed thoroughly (preferably with hot water) in a designated cleaning area. Project materials, vehicles, machinery, and equipment should be visibly free of mud/dirt (excluding aggregate), seeds, plant debris, insects, spiders, frogs (including frog eggs), other vertebrate species (e.g., rodents, mongoose, feral cats, reptiles, etc.), and rubbish. Areas of particular concern include bumpers, grills, hood compartments, wheel wells, undercarriage, cabs, and truck beds. Truck beds with accumulated material are prime sites for hitchhiking invasive species	Construction Contractor
Bio 11	The interior and exterior of vehicles, machinery, and equipment must be free of rubbish and food, which can attract pests (i.e., rodents and insects). The interiors of vehicles and the cabs of machinery should be vacuumed clean particularly for any plant material or seeds.	Construction Contractor
Bio 12	Following cleaning and/or treatment, project materials, vehicles, machinery, and equipment, must be visually inspected by its user, and be free of mud/dirt (excluding aggregate), debris, and invasive species prior to entry into a project site. For example, careful visual inspection of a vehicle's tires and undercarriage is recommended for any remaining mud that could contain invasive plant seeds.	Construction Contractor
Bio 13	Any project materials, vehicles, machinery, or equipment found to contain invasive species (e.g., plant seeds, invertebrates, rodents, mongoose, cats, reptiles, etc.) must not enter the project site until those invasive species are properly removed/treated.	Construction Contractor
Bio 14	Prior to entry into the project site, all project site personnel will visually inspect and clean clothes, boots or other footwear, backpack, radio harness, tools and other personal gear and equipment for insects, seeds, soil, plant parts, or other debris. Seeds found on clothing, footwear, backpacks, etc., should be placed in a secure bag or similar container and discarded in the trash rather than being dropped to ground at the project site or elsewhere.	Construction Contractor
Bio 15	Prior to the commencement of clearing and grubbing activities a survey for nesting passerines will be conducted by a qualified biologist and appropriate measures will be implemented to avoid impacts to the nest, eggs and young of any nesting bird species currently covered under the MBTA.	NPS Construction Monitor
<u>Bio 16</u>	<u>Nighttime work that requires outdoor lighting will be avoided during the seabird fledging season, from September 15 through December 15 to avoid impacts to fledging seabirds.</u>	<u>NPS Construction Monitor</u>

Impact Area	Mitigation	Lead/ Responsible Party
<u>Bio 17</u>	<u>If the ae'o or Hawaiian stilt (<i>Himantopus mexicanus knudseni</i>), 'alae ke'oke'o Hawaiian coot (<i>Fulica alai</i>), or nēnē or Hawaiian Goose (<i>Branta sandvicensis</i>) are present during construction, all activities within 100 feet (30 meters) will cease and the bird or birds will not be approached. Work may continue after the bird or birds leave the area of their own accord.</u>	<u>NPS Construction Monitor</u>
<u>Bio 18</u>	<u>If State endangered 'ilio holo i ka uaua or Hawaiian Monk Seal (<i>Monachus schauinslandi</i>), Honu or Green Sea Turtle (<i>Chelonia mydas</i>), and Honu'ea or Hawksbill Sea Turtle (<i>Eretmochelys imbricata</i>) are detected within 100 meters of the project area, all nearby construction operations will cease and not continue until the focal animal has departed the area on its own accord. (Note: Due to their distances from the coastline, this mitigation measure would not apply to work performed at Sites 1 or 2.)</u>	<u>NPS Construction Monitor</u>
Cultural Resources (CR 1)	During construction/demolition activities, archeological features will be protected by clearly establishing areas where surface disturbing activities are prohibited. This may include clearly marking or cordoning off specific areas of archeological concern.	NPS Resource Staff
CR 2	Final structure siting and design will incorporate a buffer of at least 15 feet from identified archeological features. No structures, or surface disturbance, <u>or landscaping</u> would occur within this buffer.	NPS Resource Staff
CR 3	An Archeological Monitoring Plan would be prepared in consultation with Native Hawaiian Organizations and the State Historic Preservation Officer (SHPO) prior to any surface disturbance.	NPS Resource Staff
CR 4	A qualified archeological monitor would be on site during all surface disturbing activities in case of inadvertent discovery and to ensure the terms of the Archeological Monitoring Plan are fully implemented.	Construction Contractor <u>NPS Resource Staff/Resource Contractor</u>
CR 5	A Native American Graves Protection and Repatriation Act (NAGPRA) Plan of Action [43 CFR 10.5(e)] would be prepared in consultation with Native Hawaiian Organizations and the State Historic Preservation Officer (SHPO) prior to any ground disturbing activities. This plan would guide NPS's response in the event that human remains or other NAGPRA items are encountered during construction.	NPS Resource Staff
CR 6	All construction personnel working on site would be made aware of the relevant SOPs outlined in the Archeological Monitoring Plan, as well as areas where surface disturbing activities are prohibited.	NPS Resource Staff
CR 7	If construction at Site 2 requires the removal of or irreversible damage to plants that are identified as culturally important, they would be replaced in kind on-site in suitable locations.	NPS Resource Staff

Impact Area	Mitigation	Lead/ Responsible Party
CR 8	Final facility design will consider and allow for continued access to culturally important areas. During construction, access to archeological features known to be culturally and spiritually important to Native Hawaiians will be maintained to the maximum extent possible. In the event that construction activities would temporarily impede access, that information would be provided to and coordinated with Hawaiians with lineal and cultural ties to Hōnaunau.	NPS Resource Staff
CR 9	When construction activities would raise ambient noise levels to a point that would be potentially disruptive to cultural practices, that information would be provided to and coordinated with potentially affected groups/individuals.	NPS Resource Staff
Transportation Facilities (TF 1)	Flaggers could be used during work hours to control traffic and visitors would be informed of construction activities and associated delays.	Construction Contractor

Appendix C: Non-Impairment Determination

Non-Impairment Determination

Introduction

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the NPS to manage units "to conserve the scenery, natural and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 United States Code 100101). Before approving a proposed action that could lead to an impairment of park resources and values, a NPS decision maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values.

Sections 1.4.5 and 1.4.6 of NPS *Management Policies 2006* provide an explanation of impairment. Section 1.4.5 defines impairment as, "an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values." Section 1.4.5 goes on to state that, "an impact to any park resource or value may, but does not necessarily, constitute an impairment." An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- identified in the park's General Management Plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Pu'uhonua o Hōnaunau National Historical Park's Foundation Document (September 2017) identifies the Park's fundamental resources and values as follows:

Pu'uhonua and Royal Grounds. Sites developed as primary religious and political centers within the traditional District of Kona. The Pu'uhonua served as a safe haven for violators of laws of conduct, defeated warriors, and noncombatants during times of conflict. The district's ali'i (ruling class) resided in the Royal Grounds.

Great Wall. A massive dry-set rock masonry wall that divides the Royal Grounds from the Pu'uhonua and forms the inland boundary of the Pu'uhonua.

Hale o Keawe. A reconstructed temple that once held the deified bones of 23 royal chiefs, located at the northern end of the Great Wall and entrance to the Pu'uhonua.

Ki'ilae. A farming and fishing village that was inhabited by Native Hawaiians and their descendants from ancient times until about 1926. One of the last surviving coastal villages, Ki'ilae offers a glimpse into the post-contact history of Kona into the early 20th century.

1871 Trail. A one-mile-long segment of the Ala Kahakai National Historic Trail located within the park that extends from behind the visitor center to Ki'ilae Village. The Ala Kahakai National Historic

Trail is a 175-mile-long corridor and trail network of cultural and historical significance that is itself a distinct unit of the national park system.

Cultural Landscape. A variety of interrelated natural and cultural resources within the Park consisting of major sites such as the Pu‘uhonua and Royal Grounds, as well as hundreds of other archeological sites and features, and includes native plants that remain meaningful to Native Hawaiians and support traditional cultural practices.

Traditional Cultural Practices. The park has cultural and spiritual significance to Native Hawaiians, who have used these lands since ancient times and continue to visit sites and features within the park for traditional practices.

The Concept of Pu‘uhonua: Opportunities for Refuge and Renewal. Building on the ancient concept and practice of Pu‘uhonua (refuge), the Park offers visitors a place to experience refuge and renewal in a personally meaningful way.

Opportunities to Experience a Natural Setting. The Park provides access to a wide range of natural resources (sky, water, geologic, vegetation, and wildlife resources) for visitors to observe and experience, including natural soundscapes.

Non-Impairment Determination for the Selected Alternative

Resources that were carried forward for detailed analysis in the EA and are considered necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; are key to the natural or cultural integrity of the park; and/or are identified as fundamental resources and values that could be impaired by the selected alternative include: Archeological Resources, Cultural Landscape, Native Hawaiian Concerns, Traditional Cultural Practices, and Opportunities to Experience a Natural Setting. Impairment determinations are not necessary for non-resource topics such as Transportation Facilities because they are not generally considered to be park resources or values and cannot be impaired in the same way that an action can impair park resources and values. The selected alternative would have no direct or indirect effects on the following park resources, and thus are not included in the determination of impairment: Pu‘uhonua and Royal Grounds, Great Wall, Hale of Keawe, Ki‘ilae, 1871 Trail, or the Concept of Pu‘uhonua: Opportunities for Refuge and Renewal.

Biological Species of Special Concern or Their Habitat

The selected alternative will almost entirely be constructed on previously disturbed, cleared, or developed land and would not directly impact species of special concern or their habitat. Construction and operational activities are not likely to impact protected avian species, as the project areas do not represent unique habitat within the Park and there is no nesting habitat for protected seabirds on or close to the selected alternative project site. Indigenous migratory shorebird species that may occasionally use loafing and foraging habitat at or close to the project area may be adversely affected by construction and operational activities. However, increases in noise levels from construction activities to the ambient noise environment would be negligible and temporary. Construction activities would not further threaten the existence of any protected species or critical/sensitive habitats. Operational period noise and activity would increase at Site 1, but decrease at the existing maintenance facility site. Mitigation measures for the selected alternative (FONSI Appendix B) would avoid, minimize, or mitigate potential adverse impacts to biological resources, including to subsurface lava tubes that may be discovered during installation of building foundation pilings. NPS has conducted informal consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. NPS determined that the Proposed Action may affect but is not likely to adversely affect the Band-rumped Storm-Petrel, Hawaiian Petrel, and Newell’s Shearwater and will result in no effect to other listed species. By letter dated September 15, 2023, the

USFWS concurred with the NPS determination, which concluded the informal consultation process. The incremental impacts of the selected alternative on biological species of special concern or their habitat are unlikely to interact in a way that would be cumulatively impactful when considered with the effects of other past, present, or reasonably foreseeable actions. The selected alternative's minor impacts to existing vegetation and its unlikely impacts to protected species will not result in an impairment to biological species of concern or their habitat.

Archeological Resources

The selected alternative includes the construction of new facilities almost entirely on previously disturbed and developed areas. Where the facility/associated development cannot be fully sited within previous disturbance, by project design, structures and all associated surface disturbance will avoid known archeological features by no less than 15 feet (EA page. 3-8 and Mitigation Measure CR 2). If construction activities at Site 1 results in inadvertent discovery of archeological resources, the response and treatment of such discoveries would be guided by an Archeological Monitoring Plan and a Native American Graves Protection and Repatriation Act (NAGPRA) Plan of Action. These two documents would collectively guide any necessary treatments, analysis, and disposition of resources discovered during construction, and would be completed prior to any ground disturbing activities (see Mitigation Measures CR 3 and CR 5). In addition, an archeological monitor would be required to be on-site during any ground disturbing activities (see Mitigation Measure CR 4). These project requirements would effectively minimize any adverse impacts resulting from inadvertent resource discovery. Based on the proposed design criteria and relevant mitigation measures, the selected alternative would likely result in minor adverse impacts to archeological resources if any are inadvertently discovered during construction. The incremental effects of the selected alternative could result in beneficial cumulative impacts on archeological resources when considered in combination with past, present, and reasonably foreseeable actions due to removal of the current maintenance facilities from an area underlain by archeological resources. Based on the analysis above, NPS has determined that the selected alternative will not result in an impairment to the Park's archeological resources.

Cultural Landscapes

The NPS conducted a visual impact assessment for the selected alternative (EA Appendix C) and analyzed the selected alternative's impacts on cultural landscapes (EA page 3-11). The analysis indicated that the selected alternative would likely result in minor adverse impacts to the cultural landscape. The new facilities would largely be screened from view by existing vegetation and topography, and, based on preliminary design plans, it would have limited visibility from within the Visitor Center cultural landscape. It may be visible from northern portions of the Royal Grounds, but those views would be at a much greater distance (about 1,500 feet), with additional screening provided by the Visitor Center and amphitheater buildings in the foreground. Proposed improvements and modifications to the existing access road to Site 1 would generally be below grade, resulting in minimal impacts to the cultural landscape. There would be beneficial impacts to the cultural landscape from removal of the existing maintenance facilities from their coastal location—resulting in the site more closely resembling the area's historic setting and appearance. When considered in combination with past, present, and reasonably foreseeable actions, the incremental impacts of the selected alternative would not result in cumulative impacts on cultural landscapes. Based on the analysis above, NPS has determined that the selected alternative will not result in an impairment to cultural landscapes.

Native Hawaiian Concerns and Traditional Cultural Practices

The issue of Native Hawaiian Concerns was addressed in detail in the EA and traditional cultural practices is an identified Park value. These topics are inter-related and their potential for impairment from the selected alternative are addressed together below.

It is the Park's duty to protect land, water, and biocultural relationships and to manage access to the landscape for cultural practices by groups of people with traditional associations to park lands or resources. The framework for analyzing these impacts is shaped by NPS management policies on use of park lands by groups of people with traditional associations to park lands or resources. Analyzing the impacts of the proposed undertaking on access is therefore a key component of this analysis, as well as how the construction and operation of the new facility may impact how Native Hawaiians experience the places they access. The selected alternative will beneficially impact the cultural landscape through the removal of the existing maintenance facility, and have an indirect beneficial impact on the exercise of traditional cultural practices. Elevated noise during construction of the new maintenance facilities and demolition/deconstruction of the existing facilities could adversely affect cultural and spiritual practices in the Park. However, construction activities would be temporary and short-term.

Consultation with the Native Hawaiian community on this project and the alternatives under consideration has been ongoing since 2021. Those consulted have been supportive of the project objectives and purpose and need. Several individuals raised concerns about the proximity of the selected alternative's proposed construction to archeological features nearby. Extensive archeological inventory surveys were conducted at Site 1 to assist in identifying suitable locations for new construction and to analyze potential impacts of the alternatives. The survey areas extended well beyond the potential construction footprints in order to understand the area's broader archeological context, and identified formal and informal archeological features. Archeological features known to be culturally and spiritually important to Native Hawaiians with lineal and cultural ties to Hōnaunau identified near Site 1 would be protected from direct or indirect impacts during project construction and operations. These protections would be required by project design. In case of inadvertent discovery of cultural resources, response and treatment would be guided by an Archeological Monitoring Plan and a NAGPRA Plan of Action. These two documents would be developed in consultation with Native Hawaiian Organizations and individuals/'ohana, and would collectively guide any necessary treatments, analysis, and disposition of resources discovered during construction. Access to these sites and features would be maintained during the construction and operational periods.

During the operational period, the integrity of Native Hawaiian cultural and spiritual practices and experience would be retained, as existing practices would continue within the main Park unaffected by activities at Site 1, and such activities in the vicinity of the current maintenance facility would be enhanced by its removal. The visual impacts to sites important for traditional Hawaiian practices and cultural activities would be minimal. The selected alternative may have cumulative minor adverse impacts during the construction period due to multiple periods of construction noise. However, construction activities would be temporary and short-term and mitigation measures would avoid or minimize impacts and, together with its overall beneficial impact of removing the existing maintenance facilities from their current site, the selected alternative is unlikely to result in adverse cumulative impacts on Native Hawaiian concerns. Based on the analysis above, NPS has determined that the selected alternative will not result in an impairment to Native Hawaiian concerns and traditional cultural practices.

Opportunities to Experience a Natural Setting

Construction period activities and at Site 1 and the current maintenance facility areas may impact the visitor experience of the natural soundscape during construction and demolition periods. However, construction of the new facilities is located in areas not accessed by the public and would not likely affect visitor experience engagement with other aspects of the Park's natural setting (sky, water, geologic, vegetation, and wildlife resources). Demolition and removal of the existing maintenance facilities near the coastline are adjacent to public use areas and activities there would have greater noise impacts to visitors. However, as noted in Section 1.4.5 of *NPS Management Policies 2006*, this type of impact is less likely to constitute an impairment because it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. The short-term, temporary construction-related noise impacts can be considered an unavoidable action that is necessary to achieve the project's purpose, need, and objectives, which include minimizing impacts to the cultural landscape, reducing impacts to resources, and improving the Park experience.

Although operational period noise and activity would increase at Site 1, it is not accessed by the public. Operational period noise and activity would decrease at the existing maintenance facility site, which is adjacent to areas used by the public. Therefore, the selected alternative's potential minor impacts to the plant or animal species and changes in locations of park maintenance activities are unlikely to affect opportunities for visitors to experience the Park's natural resources such as sky, water, geologic, vegetation, and wildlife resources. NPS has determined that the selected alternative will not result in an impairment to opportunities to experience a natural setting.

Conclusion

The NPS has determined that implementation of the selected alternative will not constitute an impairment of the resources or values of the Pu'uhonua o Hōnaunau National Historical Park. This conclusion is based on an analysis of the Park's identified fundamental resources and values, the environmental impacts described in the May 2023 EA, proposed mitigation measures, relevant scientific studies and resource reports, and the professional judgment of the decision maker guided by the direction in *NPS Management Policies 2006*.