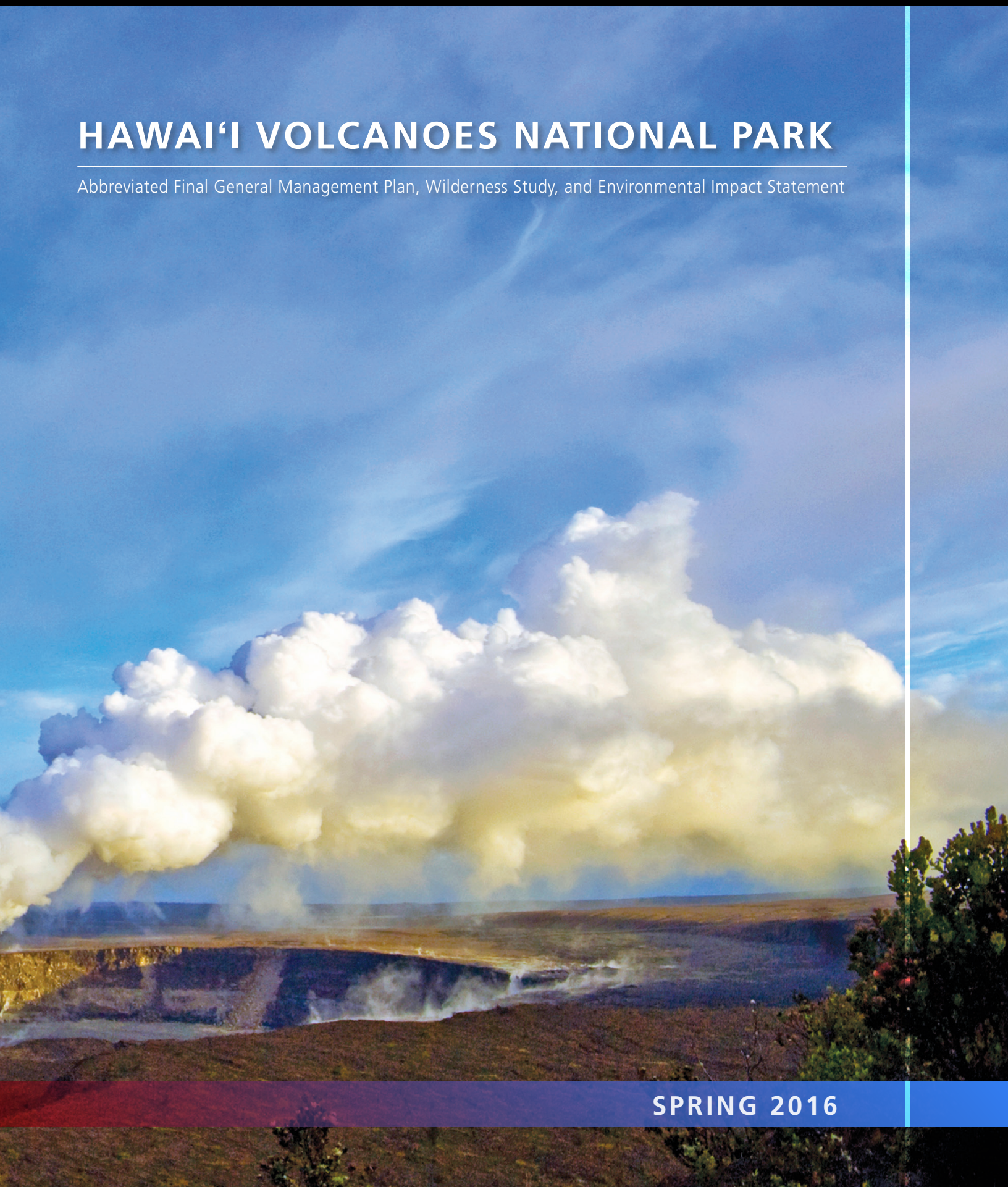
National Park Service
U.S. Department of the Interior
Hawai'i Volcanoes National Park

HAWAI'I VOLCANOES NATIONAL PARK

Abbreviated Final General Management Plan, Wilderness Study, and Environmental Impact Statement



SPRING 2016

Hōlei Sea Arch. *Photo by Peter Anderson.*

ABSTRACT

HAWAIʻI VOLCANOES NATIONAL PARK ABBREVIATED FINAL GENERAL MANAGEMENT PLAN / WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT

The *Hawaiʻi Volcanoes National Park Draft General Management Plan / Wilderness Study / Environmental Impact Statement* (Draft GMP/WS/EIS) examines three possible management strategies or "alternatives," including the impacts of implementing these alternatives in the park. These alternatives, described below, address visitor use and the preservation of natural and cultural resources to protect and interpret the significance of the park. They comply with National Park Service (NPS) planning requirements and respond to issues identified during the public scoping process. This draft plan was available for public and agency review from May 1, 2015 through June 30, 2015.

Alternative 1 (no action) would assume that existing programming, facilities, staffing, and funding would generally continue at current levels to protect the values of Hawaiʻi Volcanoes National Park. There would be no major changes in current management or visitor use, and implementation of currently approved plans would continue as funding allows.

Alternative 2 (preferred) would strengthen and broaden opportunities to connect people with the volcanic world treasure, Hawaiʻi Volcanoes National Park, and provide a wide range of high-quality visitor experiences based on different geographic areas. This alternative emphasizes the park's role as a refuge and haven for native biota, people, and cultures in a world constantly adapting to volcanic activity and island-building processes and emphasizes Native Hawaiian values such as mālama ʻāina (nourishing or taking care of the land) and kuleana (responsibility) as important concepts in park stewardship of resources.

Alternative 3 emphasizes building new connections with the park, primarily through expanded education and hands-on stewardship opportunities. As in the preferred alternative, this alternative emphasizes the park's role as a refuge and haven for native biota, people, and cultures in a world constantly adapting to volcanic activity and island-building processes and emphasizes Native Hawaiian values such as mālama ʻāina and kuleana as important concepts in park stewardship of resources.

All alternatives also recommend modifying the boundary of Hawaiʻi Volcanoes National Park to include 31,784 acres of previously identified high priority lands. In addition, the plan includes a Wilderness Study through which the NPS recommends wilderness designation of the lands found eligible in Kahuku (121,015 acres), which was acquired by the NPS in 2003. This designation of wilderness in Kahuku would create connectivity for park wilderness that would span from the summit of Mauna Loa Volcano down its massive Southwest Rift. Consistent with NPS policy, the park would continue to manage these proposed eligible lands for their wilderness qualities prior to formal designation.

Environmental impacts resulting from implementation of the alternatives are addressed in the Draft GMP/WS/EIS. Impact topics include: weather and climate; air quality; volcanoes and volcanic processes and features; soils; vegetation; native wildlife and wildlife habitat; special status species; water resources; night skies; climate change; wilderness; soundscapes and the acoustic environment; historic resources; archeological resources; cultural landscapes; ethnographic resources; museum collections; visitation; visitor opportunities and experiences; interpretation, education, and outreach; commercial visitor services; visitor and employee health and safety; transportation and access; socioeconomics; partnerships and agreements; adjacent land management; and park operations.

This document is the *Hawaiʻi Volcanoes National Park Abbreviated Final General Management Plan / Wilderness Study / Environmental Impact Statement* (Final GMP/WS/EIS). It responds to and incorporates the public and agency comments received on the Draft GMP/WS/EIS. An abbreviated final GMP/WS/EIS is used because the comments received require only minor changes involving only factual corrections or explanations of why comments do not warrant further response. No substantial changes have been made to the alternatives or to the impact analyses presented in the Draft GMP/WS/EIS as a result of public comments. Therefore, Alternative 2 remains the NPS preferred alternative. Following the public release of this Abbreviated Final GMP/WS/EIS, there will be a 30-day no action period, after which the NPS will prepare a record of decision documenting the selected alternative and setting forth any stipulations for implementation of the GMP. This Abbreviated Final GMP/WS/EIS and Draft GMP/WS/EIS will constitute the complete and final documentation upon which the record of decision will be based.

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HAWAI‘I VOLCANOES NATIONAL PARK

Abbreviated Final General Management Plan, Wilderness Study, and Environmental Impact Statement

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LETTER FROM THE SUPERINTENDENT

Aloha Friends,

We are pleased to share with you the *Hawai'i Volcanoes National Park Abbreviated Final General Management Plan/Wilderness Study/Environmental Impact Statement* (Final GMP/WS/EIS). The document includes an analysis of comments received on the Draft GMP/WS/EIS with NPS responses, errata sheets detailing editorial corrections to the Draft GMP/WS/EIS, and copies of letters received from agencies and organizations.

The plan will guide long-term decisions about the preservation and use of Hawai'i Volcanoes National Park. Over the past few years, the public has participated in the planning process through public meetings, formal and informal consultation, newsletters, and materials posted on websites and through social media. In May 2015, the Draft GMP/WS/EIS was available for public review for over 60 days. Approximately 800 interested individuals, agencies, and organizations were sent a newsletter summarizing the alternatives in the plan. These newsletters, as well as copies of the draft plan were also available for review at the park's visitor centers, at local libraries, and on the NPS Planning, Environment, and Public Comment (PEPC) website (http://parkplanning.nps.gov/HAVO).

The National Park Service (NPS) hosted a public meeting/talk story session and wilderness hearing on June 10, 2015. Press releases, email notifications, social media posts, and messages on the park's nps.gov homepage announced the availability of the document, as well as the talk story session date and time.

The NPS received 32 pieces of correspondence on the draft plan. This commentary was thoughtful, helpful, and sincere. We would like to thank the people who commented for sharing their insights. We also would like to express our appreciation to the many people – partners, advisors, and members of the public – who provided input throughout the planning process. Your input has confirmed our belief that alternative 2 is the preferred alternative and that the management actions it proposes will best guide long-term stewardship of Hawai'i Volcanoes National Park.

The enclosed document is in an abbreviated form because comments received during the public review period required only minor responses and editorial changes to the Draft GMP/WS/EIS. There are no substantial changes to the alternatives or the impact analyses presented in the Draft GMP/WS/EIS. Alternative 2 remains the NPS preferred alternative. The abbreviated format has allowed us to produce a simple, brief document and to avoid the costly reprinting of the entire 500-plus page document.

The public release of the Abbreviated Final GMP/WS/EIS will be followed by a 30-day no-action period, after which the NPS will prepare a record of decision to document the selected alternative. The Abbreviated Final GMP/WS/EIS and the Draft GMP/WS/EIS constitute the documentation upon which the record of decision will be based.

Mahalo nui loa,

Cindy Orlando
Superintendent

You can access information about the Hawai'i Volcanoes National Park GMP/WS/EIS at http://www.nps.gov/havo/parkmgmt/plan.htm.

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PUBLIC REVIEW AND COMMENTS ON DRAFT GMP/WS/EIS

INTRODUCTION

This document is the *Hawai'i Volcanoes National Park Abbreviated Final General Management Plan/ Wilderness Study/Environmental Impact Statement* (Final GMPS/WS/EIS). The material included here is to be combined with the H*awai'i Volcanoes National Park Draft General Management Plan / Wilderness Study / Environmental Impact Statement* (Draft GMP/WS/EIS) that was distributed for public review in May 2015. The 60-day public review period was held from May 1, 2015 through June 30, 2015. This document is composed of a summary of the public review process for the Draft GMP/WS/EIS, the National Park Service (NPS) responses to public comments, errata detailing editorial changes to the Draft GMP/WS/EIS, and copies of comment letters from agencies, business, and other organizations (Appendix A).

An abbreviated final GMP/WS/EIS is used because the comments received on the draft document require only "minor changes involving only factual corrections or explanations of why comments do not warrant further response" (Director's Order 12 Handbook 2015). No substantial changes have been made to the alternatives or to the impact analyses presented in the Draft GMP/WS/EIS as a result of public comments. Rather than updating and republishing the Draft GMP/WS/EIS as a full-length 500-plus page document, this abbreviated final incorporates the Draft GMP/WS/EIS by reference and responds to comments and text changes within an errata that is included within this document.

Use of this format is in compliance with the 1969 National Environmental Policy Act (NEPA) regulations (40 Code of Federal Regulations or CFR 1503.4 (c)) and Director's Order #12 (2011) and associated NEPA Handbook (2015). The draft and abbreviated final documents together present the full *Hawai'i Volcanoes National Park General Management Plan / Wilderness Study / Environmental Impact Statement*, including the alternatives, associated environmental impacts, comments that were received and evaluated, and responses to the comments.

Following the public release of this Abbreviated Final GMP/WS/EIS, there will be a 30-day no action period, after which the NPS will prepare a record of decision documenting the selected alternative and setting forth any stipulations for implementation of the GMP. This Abbreviated Final GMP/WS/EIS and Draft GMP/WS/EIS will constitute the complete and final documentation upon which the record of decision will be based.

SUMMARY OF THE PUBLIC REVIEW PROCESS FOR THE DRAFT GMP/WS/EIS

The official public review process for *Hawai'i Volcanoes National Park Draft General Management Plan / Wilderness Study / Environmental Impact Statement* began on May 1, 2015 and ended July 30, 2015. The NPS announced the public release of the Draft GMP/WS/EIS and invited public comment through a notice in the *Federal Register*, press releases, websites, mailings, social media, and a public talk story session (open house style meeting) and formal wilderness hearing.

The NPS formally announced the public review process through a Notice of Availability published by the Environmental Protection Agency (EPA) in the *Federal Register* on May 1 (v80, n84, pp 24915). The NPS published the Notice of Availability again on May 6, 2015 (v80, n87, pp 26086). A press release announcing the availability of the Draft GMP/ WS/EIS was distributed to local and regional news media on April 30, 2015, and the draft plan and information about how to provide public comments were made available on the NPS and Planning, Environment, and Public Comment (PEPC) websites (www.nps.gov/havo and http://parkplanning.nps.gov/havogmp) on May 1, 2015. The project site on the PEPC website (http://parkplanning.nps.gov/havogmp) also included a venue to accept public comments. In late April 2015, the NPS distributed approximately 107 paper and digital copies of the complete Draft GMP/WS/EIS to state congressional offices, Native Hawaiians individuals and organizations, governmental agencies, and

other interested organizations and individuals. The NPS also produced and mailed the Draft GMP/WS/EIS Executive Summary Newsletter #4 to over 800 contacts on the park's mailing list. The newsletter fully outlined the three alternatives in the plan and encouraged the public to participate in the planning process.

The NPS held a talk story session and formal wilderness hearing on June 10, 2015 at the Kīlauea Visitor Center to share information, answer questions, and take public comment. Approximately 20 people participated in these meetings and provided oral comments. The talk story session was structured as an open house, with information available on posters and via shared documents, and NPS staff were onsite to write down comments directly from attendees. A NPS facilitator and independent court reporter led the wilderness hearing in the auditorium of the visitor center during the talk story session where they answered questions about wilderness protection and management and took formal comments regarding the Wilderness Study within the Draft GMP/WS/EIS. This talk story session and wilderness hearing was announced via the newsletter, the project website, social media, and a separate press release that was distributed to media on June 5, 2015.

Throughout the public review period, the public had opportunities to provide comments through attending the talk story session and wilderness hearing, submitting comments on the project website in PEPC, writing a letter or e-mail, or providing comments on the postage paid comment form enclosed in the newsletter. Contact information for the public to either request more planning materials and/or comment on the draft plan was printed in the newsletter and available on the web.

Range of Public Comments

During the public review period, the NPS received 32 responses in the form of letters, comment cards, phone calls, and comments submitted on the NPS Planning, Environment, and Public Comment (PEPC) website. Of the comments received, two were from businesses, two were from non-profit conservation organizations, and one was from another federal agency. The EPA also provided comments on the Draft EIS, rating the proposed project as Lack of Objections (LO), and requested that additional information be included in the Final EIS. No form letters were submitted.

The comments on the Draft GMP/WS/EIS covered a broad range of topics, issues, and recommendations for Hawai'i Volcanoes National Park. The comments were entered into the NPS Planning Environment and Public Comment database and analyzed.

The public provided comments on the following topics which are further elaborated on in the next section, "Comments and Responses Summary":

- Alternatives
- Kahuku
- 'Āinahou
- Facilities and Access
- Trails
- Bikes
- Equestrian Use
- Visitor Experience
- Cultural Resources
- Natural Resources
- Climate Change
- Wilderness
- Boundaries
- Partners
- Commercial Services
- Air Tours
- Planning Process

List of Commenters

The following is a list of agencies, businesses, and interest groups and organizations that provided comments on the draft plan. These comment letters are included in this document in Appendix A. Copies of all letters are available in electronic format upon request, with individual names and addresses removed.

- Kīlauea EcoGuides
- Digital Tours – Hawaii, LLC
- Ka Ahahui O Ka Nahelehele
- Sierra Club
- Ala Kahakai National Historic Trail

Again, the EPA provided comments on the Draft EIS, rating the proposed project as LO, and requested that additional information be included in the Final EIS (letter dated July 2, 2015). This letter is also included in Appendix A.

COMMENTS AND RESPONSES SUMMARY

Public comments allow the planning team, NPS decision-makers, and other interested parties to review and assess the views of other agencies, organizations, and individuals related to the preferred alternative, the other alternatives, and potential impacts.

All written comments were considered during the preparation of this Abbreviated Final GMP/WS/EIS in accordance with the requirements of Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (40 CFR 1503).

It is important to stress that the identification of the preferred alternative and revisions to the alternative are not based on how many people supported a particular alternative.

Analysis of Substantive Comments on the Draft Plan

Consistent with the requirements of 40 CFR 1503, the NPS staff has provided written responses to those pieces of correspondence that have either substantive comments or comments that the NPS planning team determined required a written response for clarification.

Substantive comments are defined by Director's Order 12, "Conservation Planning, Environmental Impact Analysis and Decision-Making" (NPS, 2001) as those comments that:

- Question, with reasonable basis, the accuracy of information in the environmental impact statement.
- Question, with reasonable basis, the adequacy of the environmental analysis.
- Present reasonable alternatives other than those presented in the environmental impact statement.
- Cause changes or revisions in the proposal.

Substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the preferred alternative or alternatives, or those that only agree or disagree with NPS policy are not considered substantive. Comments that contain substantive points regarding information in the Draft GMP/WS/EIS or comments that need clarification are extracted below.

NPS Responses to All Commenters

A concern statement has been developed to summarize the comments recieved on the Draft GMP/WS/EIS below, but representative quotes are also included from original letters, edited only for style consistency and spelling. All comment letters from agencies, organizations, and businesses have been scanned and are included in Appendix A.

Where appropriate, text in the Draft GMP/WS/EIS has been revised to address comments and changes (as indicated in the following responses) in an errata included within this document. Unless otherwise noted, all page number citations refer to the *Hawai'i Volcanoes National Park Draft General Management Plan / Wilderness Study / Environmental Impact* Statement (May 2015).

ALTERNATIVES (25 COMMENTS)

Concern 1:
The alternatives are not significantly different.

NPS Response:
See page 171 in the GMP for an explanation of how alternatives were combined and revised in response to comments on the preliminary alternatives (under "Alternatives B and C"). Based on these public comments, the two action alternatives have similar guidance for managing natural and cultural resources in the park, but they differ significantly on proposed developments within the park for managing visitor use and enhancing the visitor experience. For example, Alternative 3 would maintain the closure along Crater Rim Drive and use shuttles as the primary methods for transportation and managing congestion whereas Alternative 2 would reopen Crater Rim Drive to two way traffic assuming eruptive activity ceases or changes in Halema'uma'u Crater and the park determines through active monitoring that air quality and other hazards are at a level that is consistent with general visitor use. Recreational opportunities in Kahuku would also be more primitive and limited than in Alternative 2. In addition, Alternative 3 would prohibit commercial use in Kahuku whereas Alternative 2 would allow for this use. Alternative 3 also focuses more on guided-only access in key areas.

Concern 2:
The preferred alternative needs to include more science, learning opportunities, restoration and public involvement.

Representative Comment:
- "In general, the improvements listed in Alt 2 sound fine. The final plan needs to incorporate more of the science, learning opportunities, restoration and public involvement listed in Alt 3. This is important to help engage the public with the park, and to meet the park's mandate to maintain and restore the natural environment."

NPS Response:
We agree that public involvement in science, restoration, and other stewardship activities within the park are "important to help engage the public with the park, and to meet the park's mandate to maintain and restore the natural environment". That is why the preferred alternative states that, "Stewardship and hands-on activities would be a key element in these programs engaging visitors in research, learning, science, restoration, and educational programs and facilities. In addition, park staff would engage visitors in research and citizen science (page 143)". While these activities are the primary focus of any new visitor opportunities within Alternative 3, these important elements are still incorporated within the preferred alternative.

Concern 3:
The preferred alternative needs to include reference to the Ala Kahakai National Historic Trail in compliance with Public Law 106-509.

Representative Comment:
- "[I]nclusion of [Ala Kahakai NHT] in the Preferred Alternative is actually mandated by Public Law 106-509 which established the ALKA corridor within all NPS units on Hawai'i Island. As such it needs to be included in all Alternatives."

NPS Response:
While Alternative 1 is the only alternative that specifically references Ala Kahakai National Historic Trail (page 113), the referenced language in Alternative 1 is actually a duplicate of language that is incorporated within Actions Common to All Alternatives in the GMP (page 98), which states: "The park would continue to work with Ala Kahakai National Historic Trail staff to sign and interpret those trail segments through the park." Therefore this action is already incorporated within all alternatives in the GMP, including the preferred.

KAHUKU (17 COMMENTS)

Concern 4:
Develop an orientation/interpretive strategy for Kahuku to define and site various media to interpret Mauna Loa history, native species and forest conservation, history of cattle ranching, and Native Hawaiian presence in this area.

Representative Comment:
- "Ensure the interpretive programs at Kahuku continue and are expanded, and incorporate third bullet point [references a specific poster at the talk story session] under Kahuku in alternative 1."

NPS Response:
On page 143 of the GMP, the preferred alternative states that the park "would develop a comprehensive interpretive plan that would expand interpretive opportunities to introduce visitors to all of the park's interpretive themes through the use of interpretive standards and methods. Kahuku would also be integrated into the park's comprehensive interpretive plan, and key stories...would be featured in this unit."

As of December 2015, the park is finalizing the Comprehensive Interpretive Plan that is called for within the GMP (page 142). This plan will inform the interpretive themes and programs in all areas of the park, including Kahuku.

Concern 5:
Consider fire prevention and hazardous fuels management at Kahuku.

Representative Comment:
- "With the increased public use in Lower Kahuku, increased fire suppression capability was identified. However, prevention and hazardous fuels management (e.g. fuel break) in the interface area is critical to reducing the likelihood of these fires entering the newly designated wilderness area with human-caused fires."

NPS Response:
The park has already identified specific pasture roads to be maintained as fuel breaks in the lower Kahuku area, as well as along boundary between upper and lower Kahuku. The park will continue to maintain fuel breaks and consider other fuel management reduction projects to protect key resources. Under the park's Fire Management Plan (see page 36), the current strategy in the Kahuku Unit is to suppress all fires. Because this guidance already exists and is incorporated within the GMP by reference to the Fire Management Plan, no additional changes are needed in the GMP to ensure this protection occurs.

Concern 6:
Please specify restoration goals and objectives for Kahuku and propose specific uses for the lower pastures.

Representative Comment:
- "[I would] like to see specific goals, objectives for restoration of Kahuku pastures and propose uses of lower, historic pastures."

NPS Response:
The park has been developing a Kahuku Restoration Plan and Environmental Assessment (see pages 38-39). This plan will include specifics on restoration strategies for the former pastures at the Kahuku Unit. The Site Plan for lower Kahuku, which is called out as a needed next step in the GMP, will provide the specific types of visitor-related development and uses. Both of these future documents will guide restoration and use of the lower Kahuku Unit.

Concern 7:
Consider implementing improvements for the entrance to Kahuku, camping in lower Kahuku, road access, and backcountry facilities (trails, water catchment, and shelters) in upper Kahuku. Also consider allowing commercial guided use in lower Kahuku.

Representative Comments:
- "Campgrounds in lower Kahuku are in demand."
- "Consider adding shelters and catchment in Upper Kahuku away from road to support hikers."
- "It would be nice to develop some wilderness trails in upper Kahuku that would access some of the ancient Hawaiian trails there."

NPS Response:
These suggestions are already incorporated within the preferred alternative in the Draft GMP/WS/EIS as either direct actions or actions that could be considered during future implementation of the preferred alternative (see pages 130-135).

Concern 8:
Protect the cabins in upper Kahuku and prohibit camping near these cabins for a number of resource concerns.

Representative Comment:
- "Any development of camping in NE Kahuku needs to be kept miles away from the Nēnē Cabin. Nēnē frequent this area all year and if our goal is to keep Nēnē from being habituated to humans, we need to limit the interactions in this area."

NPS Response:
We agree with your concerns about impacts to nēnē and other resources by allowing camping too close to the cabins in upper Kahuku. That is why, on page 135, the preferred alternative includes consideration for "developing a small campground in the proximity of the existing cabins and out of nēnē habitat outside of wilderness for walk-in users". This language is intended to identify the general vicinity of camping within upper Kahuku, but ensures camping would not be too close to the cabins in order to avoid potential impacts to resources near the cabins.

Concern 9:
Extend 4-wheel drive access to Upper Kahuku.

Representative Comment:
- "I would like to see access to the cabins at Kahuku available by 4-wheel drive."

NPS Response:
Vehicular access has been intentionally limited in upper Kahuku due to potential impacts from the spread of invasive species and out of consideration for potential wilderness designation in the future. Several invasive species are not found in upper Kahuku and limiting method of access keeps the risk of introductions low. Similarly, as part of completing the Wilderness Eligibility assessment, the NPS determined that once restoration has been completed, the areas of the upper Kahuku Unit that are currently excluded from wilderness eligibility could be considered again. If the NPS were

to allow public vehicle use of the roads, it would make consideration for wilderness eligibility more challenging in the future.

ʻĀINAHOU (10 COMMENTS)

Concern 10:

Restricting access to the grounds adversely effects the visitor experience and is inconsistent with management in other areas of the park. Please keep public access open to ʻĀinahou.

Representative Comment:

- "I request a MODIFIED VERSION of Alternative 2…ʻĀinahou ranch road and grounds should remain open to public access. Restricting access to the grounds is impairing the enjoyment for future generations….It is understandable to close the grounds periodically due to maintenance or Nene nesting, however to restrict public access entirely when generations of families have enjoyed this area is altogether unacceptable. Modify the statement to continue to allow public access to ʻĀinahou ranch and gardens."

NPS Response:

The ʻĀinahou Ranch was acquired under the authority of the Endangered Species Conservation Act of 1969 (see page 128) specifically for the purpose of protecting, restoring, and propagating endangered bird species. The ʻĀinahou Ranch and Grounds are not open to the public due to safety and resource protection concerns (as per Superintendent's Compendium 2015). This closure has been in effect for at least the past ten years. Currently, access to the area is limited to actions that support park objectives of cultural and natural resource protection. The ʻĀinahou Road itself is open most of the year, but is closed intermittently due to fire risk or resource protection. This is not changing within the Preferred Alternative.

Nēnē are found in many locations in the park and the park implements temporary closures as necessary to protect breeding birds. Other areas where the birds are found may not experience closures if it is not warranted.

Concern 11:

Please consider alternatives to closing general public access to ʻĀinahou.

Representative Comments:

- "There are better ways to manage this area than 100% closure."
- "[R]equire people to register with the backcountry office on the day of travel and check out again at the office same day. Take a copy of the boot print for added security as Sequoia and Kings Canyon National Park does with their backcountry hikers."

NPS Response:

The preferred alternative does not propose 100% closure of ʻĀinahou. Rather, tours, that were started on a pilot basis in 2014 but cut short due to hazardous trees and two tropical storms, may be conducted in future years following specific guidance developed by the park for natural and cultural resource protection. Other methods to monitor or control access may be considered in the future.

Concern 12:

Use ʻĀinahou for propagating native, mid-elevation plants.

NPS Response:

The use of ʻĀinahou for propagation of native plants is an operational issue and is too detailed for the Draft GMP/WS/EIS. If the park determines that propagation at this location is operationally feasible, it will be done utilizing the existing disturbed area and following Standard Operating Procedures to prevent the introduction of invasive plants, animals, fungus, etc.

FACILITIES AND TRANSPORTATION (36 COMMENTS)

Concern 13:

Expand the visitor center, but do not move the bathroom near Kīlauea Visitor Center as proposed in the preferred alternative due to cost, potential impacts to resources, and accessibility.

Representative Comments:

- "The Visitor Center has outgrown itself and needs to be expanded."
- "Instead of new bathroom, expand visitor services (interpretation, exhibit areas, etc.) to area between Kīlauea Visitor Center and Volcano Art Center to reduce impact (plumbing is more disturbance and expensive)."

- "The plan to move the restroom in order to make more room for interpretation makes no sense. The current restroom location is best for all especially for anyone who can only walk a short distance or needs a restroom right away."

NPS Response:
During the planning process for the GMP, the park identified the need to improve/increase interpretative space at Kīlauea Visitor Center. In identifying and reviewing alternatives for improving this facility, the park dismissed the alternative to expand the building itself due to associated costs and impacts to the cultural integrity of the structure (see page 174 in the GMP for further discussion) and instead has recommended the expansion of the exterior interpretive space on the lanai. While the draft GMP states that the park would do so by relocating the restrooms and freeing up more interpretive space on the lanai, these comments raise concerns about the cost and impacts of this alternative. While valid concerns, the park believes more analysis is needed to assess how these costs and impacts would compare to the benefits of relocating the restrooms (ex: decreased noise in the lanai area) and how they would compare with the alternative to expand the lanai around the restrooms. In other words, the NPS remains committed to increasing the exterior interpretive space at Kīlauea Visitor Center and is not ready to dismiss this alternative from further analysis. Rather, the park would complete this additional analysis through the completion of a site plan for the complex of buildings on the summit of Kīlauea, as called for in the GMP. The language in the GMP has been updated through the errata to clarify that the park would improve exterior interpretive space at the visitor center through the completion of the recommended site plan. This site plan would assess the benefits and impacts of the various alternatives for doing so, including the potential relocation of the restrooms. See the "Errata," "Page 121" for the final wording on this action within the GMP.

Concern 14:
Bathrooms need to be improved or expanded and more sitting areas and picnic tables are needed at a number of locations within the park.

Representative Comments:
- "Add a restroom at Kīlauea Iki."
- "More restrooms at Mauna Loa parking lot."
- "More picnic tables are needed throughout the park. With over a million visitors a year, many want to picnic but the lack of tables is not helping any, especially near the Visitor Center area. The current designated Kīlauea [Overlook] Picnic area has only 2 or 3 tables, set way back from the view of the caldera, that's it."

NPS Response:
Additional or new restroom facilities and picnic areas is an operational issue and is too detailed of information for the Draft GMP/WS/EIS. The park will consider these comments during future site specific planning (see pages 124-126, 128).

Concern 15:
Parking is a major issue in the park. Parking lots need to be expanded and a shuttle system must be adopted.

Representative Comments:
- "The current Jaggar parking lot has outgrown itself, especially with the current lava fountaining activity. Vehicles waiting in long lines to get a parking stall are constantly polluting the air with exhausts fumes. The dirt area opposite the parking lot (Mauna Loa side of the parking area) should be made into a parking lot to accommodate more vehicles."
- "Parking is the most critical problem. You must adopt a shuttle system."

NPS Response:
The planning team identified these issues and concerns early in the planning process. As a result, the GMP includes recommendations to improve transportation, parking, and access within the park, particularly at Nahuku. For example, through implementing the preferred alternative in the GMP, the park would 1) continue to evaluate the effectiveness of reducing congestion through a pilot hydrogen shuttle project that would run along Crater Rim Drive (page 123); 2) implement a suite of tools to address congestion around Thurston Lava tube (such as improved visitor information, increased ranger presence, and potential vehicle size limitations for parking, time of day restrictions, and/or reservations for commercial vehicles only); and 3) reconfigure parking lots near Thurston with enhanced trail access between lots (page 125).

Concern 16:
Large commercial buses are a safety hazard on the roads. The size of these buses needs to be limited.

Representative Comment:
- "Need to seriously limit the size of the tour buses that use the roads. I visit 2 times a month from Oahu and every time I almost always have close calls with the buses because the road is narrow and they use the whole road around the curves. I always cringe every time I take a blind corner."

NPS Response:
The preferred alternative in the GMP calls for implementing a pilot program that would limit large commercial buses or vehicles over 98 inches in width and/or over 38 feet in length to one-way traffic between Jaggar Museum and Chain of Craters Road junction along the southwest portion of Crater Rim Drive (page 123), if the closed portion of Crater Rim Drive is reopened. This would preserve the historic character and alignment of the road while addressing some of the safety concerns with having large vehicles go around tight bends on this narrow road.

Tour buses are an important mode of travel for many of the park's visitors and can reduce vehicular and parking congestion within the park. Approximately 20% of the park's visitors arrive on a bus or similar tour (see page 269). The park currently conducts Commercial Use Authorization (CUA) Operator training that all CUAs are required to attend. This training includes safety as well as information on the park's natural and cultural resources. The park will continue to outreach to the CUAs utilizing the training and other methods to ensure safe driving practices are adhered to within the park.

Concern 17:
Infrastructure improvements are badly needed at Hawai'i Volcanoes National Park.

Representative Comment:
- "What should be included in the GMP are badly needed infrastructure improvements."

NPS Response:
The NPS approved an increase in the park's entrance fee (incremental increase from 2015-2017) which will provide some additional funds for improving visitor-related infrastructure. In addition, the park continues to submit requests for project funds to address deferred maintenance throughout the park. The park recognizes the need for infrastructure improvements and with the actions proposed in the GMP, the park's deferred maintenance will be reduced by $22 million. Recent projects have addressed some of the deferred maintenance in the park, such as the rehabilitation of Crater Rim Drive, resurfacing Chain of Craters Road and Mauna Loa Road, construction of the Visitor and Emergency Operations Center, and rehabilitation of Volcano House, just to name a few.

Concern 18:
Accessibility improvements are badly needed at the Petroglyphs and Thurston Lava Tube, some of the most popular destinations in the park.

Representative Comment:
- "Two of the many 'must sees' in the park are the petroglyphs and the very popular Thurston Lava Tube. Like the petroglyphs, the lava tube is not at all wheelchair friendly either. Two main features that limited mobility folks are missing out on."

NPS Response:
The park currently has plans to improve accessibility at several sites in the park and continues to evaluate other locations that may need accessibility upgrades. However, due to natural and cultural resource concerns, not all sites within the park can be made accessible. The impacts that would be required to make some sites accessible would significantly affect cultural, viewshed, and natural resources, the very reasons the sites are important. In order to meet the intent of the law, where locations cannot be made physically accessible, alternative experiences, such as off-site interpretation, will be provided for visitors that cannot personally visit the site.

TRAILS (27 COMMENTS)

Concern 19:
The park should consider restoring and/or constructing several historic trails to connect with surrounding lands.

Representative Comments:
- "NPS participates in preserving and providing connecting old and newer trails all over the US, and it is a big disappointment in this draft plan that no mention is made of these old trails and preserving them for public use."

- "Loss of access to historic and prehistoric trail routes that cross HAVO land. When HAVO was established, these trails were in use"
- "It would be nice to develop a trail which links Kakuku to MLO Strip Road (potentially in coordination with DLNR land)….I would love to see a few backcountry campgrounds and possibly a trail that would allow an avid backpacker to hike and camp from Kahuku to MLO striproad, to Kaʻū, to Puna Coast."

NPS Response:
The GMP identifies the need for completing a trail management plan for the entire park (see page 142) and articulates that development of new trail alignments would primarily be along historic alignments and traditional routes, in addition to along existing roads (such as at the Kahuku Unit). The trail management plan could consider some of the suggestions made through the comments received that relate to this topic.

Concern 20:
Trails need to be well maintained and some improvements made to address visitor safety.

Representative Comments:
- "Trails with tall grass are safety and fire hazards."
- "HAVO should increase maintenance of cabins in the park and of trail markings overall where they have become ambiguous. This can be a safety issue in several areas."
- "Improve signage at Nahuku and Kīlauea Iki. There is no signage for the trail to Nahuku from Kīlauea Iki. Many people think walking on the roadway is the only way to get there and that is very hazardous."

NPS Response:
The park recognizes there is a concern with pedestrians walking along the road and is currently developing improved signage in the Kīlauea Iki to Thurston Lava Tube area. Improvements to provide better visitor experience along Mauna Loa Road are recommended in the GMP (see pages 128-129), including considering additional turnouts and signage.

Trail maintenance is an operational issue and is too detailed of information for the Draft GMP/WS/EIS. The NPS approved an increase in the park's entrance fee (incremental increase from 2015-2017) which will provide some additional funds for improving visitor-related facilities, including trails. The park has a large amount of deferred maintenance (approximately $22 million of which would be addressed by actions proposed in the GMP, see page 148) due to lack of adequate funding over many years. The park continues to submit requests for project funds to address deferred maintenance throughout the park. The park will consider these comments as deferred maintenance projects are planned and implemented.

Concern 21:
The emergency road at the end of Chain of Craters Road should be used as a trail.

Representative Comment:
- "Emergency road will make a great trail someday."

NPS Response:
All action alternatives in the GMP include the possibility of using the emergency access route at the end of Chain of Craters Road as a trail. Due to commitments made by the NPS during the construction of this road (County of Hawaiʻi funded the construction of this route with the anticipation of being reimbursed by FEMA; FEMA includes specific mandates in their funding), the NPS is responsible for ensuring that the route is protected and maintained as an emergency access route regardless of temporary uses like trail access. This language has been clarified in the GMP in a number of locations through the errata included within this document.

BICYCLES (9 COMMENTS)

Concern 22:
More bike routes need to be built within the park to enhance public recreation, reduce congestion on roads, and reduce our carbon footprint.

Representative Comments:
- "There needs to be more focus on bicycle trail development as an alternative form of transportation and public recreation."
- "At Kahuku a lot of bicycle trail development can be done. Bicycle access to the forested pit crater would be just a start. There are miles of ranch roads in the Paddocks that would be great for bicycle access rather than having to hike."

NPS Response:
The preferred alternative in the GMP calls for additional bike access both along Chain of Craters Road and within Kahuku. Specifically, on page 123, the preferred alternative calls for improving signage along the road corridor, providing adjacent bicycle trails when feasible, and considering vehicular traffic closures during specific times of day or days of the week to encourage bicycle use on some park roads. On page 132, the plan also calls for the development of a "trail network in lower Kahuku that would accommodate different visitor abilities across a series of loop trails and trail connections in an effort to promote hiking, bicycling, and equestrian use." In addition to these specific improvements, the GMP identifies the need for completing a trail management plan for the entire park that could include recommendations for some of the suggestions made through the above comments.

Concern 23:
Please add a single track mountain bike trail in the park.

Representative Comment:
- "I would absolutely love to see single track Mt biking in specific areas of HVNP…specifically in and around the Bird Park area between Tree Molds and the Day use area and out behind the camp ground. Here in on the Big Island we have ONLY ONE worthy single track trail system to ride on…. [W]e are responsible and we take care of the area in which we ride. You have no idea how much I love HVNP and this would truly enhance my park experience!!!"

NPS Response:
The park considered adding a single track mountain bike trail in Kahuku but dismissed this from further consideration due to the miles of existing unimproved roads, impacts to resources, costs, and the challenges of managing this use. Please see page 176 in the GMP for further discussion.

The GMP recommends development of a park-wide trail management plan. This planning process will include an evaluation of locations in the park where new trails or trail uses may be warranted (pages 142). Comments received, such as those above, can be considered during the development of the trail management plan, as well as public comments received during the planning process.

EQUESTRIAN USE (2 COMMENTS)

Concern 24:
Allow equestrian use in Upper Kahuku.

Representative Comments:
- "[T]he fact that you are not necessarily restricting horseback riding in the upper areas is important, I think. Because it was a ranch, the history of it certainly included horses, and some sort of equestrian something is, I think, in keeping with the whole spirit of what's happened at Kahuku."
- "[W]e would really like to see that [horseback riding is] available in the wilderness area as well as the lower elevations."

NPS Response:
Under the preferred alternative, "the park would implement a small pilot program for equestrian use in lower Kahuku pastures" but dismissed providing full, unrestricted equestrian access to Kahuku due to anticipated impacts to natural resources in this unit (page 134). Please see page 176 in the GMP for further discussion on equestrian use in upper Kahuku and unrestricted equestrian use in this area of the park.

VISITOR EXPERIENCE (11 COMMENTS)

Concern 25:
Technology can be used more effectively to provide visitors with park information and inspire them to become more connected to the park and its resources.

Representative Comments:
- "The current wired display listening devices located at each display are outdated, dirty from hand and ear contact, rarely used and are just playthings for children. Do away with these devices and in its place, a cellphone app that will connect visitors with recordings of each display."
- "I propose that HVNP consider the pairing of mobile technology with an audio narrated experience to be the way in which we can elevate and enhance the overall experience of visitors to the park, especially as they drive."

NPS Response:
The NPS recently developed a strategy and action plan for achieving relevancy through interpretation, education, and volunteers as the agency moves into its second century. This strategy and plan call for the use of emerging technologies to encourage

self-directed learning and reach new audiences, which the GMP further reinforced. The preferred alternative in the GMP call for utilizing "new media and tools to provide inquiry-based learning through frontcountry self-guided interpretive and educational opportunities in order to meet the diverse needs of an increasingly international audience" (page 143).

CULTURAL RESOURCES (8 COMMENTS)

Concern 26:

Hawai'i Volcanoes National Park belongs not to the federal government but to Native Hawaiians and the continued management of this land by the National Park Service is illegal.

Representative Comments:

- "'Be it ordained and enacted by the Legislature of Hawai'i: That the government de jure of the Hawaiian Kingdom possess the authority to reclaim any and all land within its territorial boundaries.'"
- "[This land was] 'illegally conveyed to the United States from the government de facto of the insurrectionists. . .' Law 103-150, Sta. 1510, acknowledging and confessing to illegally overthrowing the Kingdom of Hawai'i, violating international law, and unlawfully accepting those national lands which are owned by the inherent sovereignty of Hawai'i. . .[is] still in effect in America."

NPS Response:

This assertion is at odds with the federal laws, policies, and guidelines under which the National Park Service and Hawai'i Volcanoes National Park operate, including the Organic Act of 1916 and the Hawaii National Park Act of August 1, 1916 -- which together give authority to the National Park Service to manage the lands designated as Hawai'i Volcanoes National Park. This comment is therefore outside the scope of a GMP to address.

NATURAL RESOURCES (12 COMMENTS)

Concern 27:

The GMP should consider impacts to pollinators from the proposed actions. Therefore, please include a list of herbicides that would be used in the park and specify best management practices for the application of these herbicides.

Representative Comments:

- "On June 20, 2014, President Obama issued a memorandum directing Federal departments and agencies to evaluate and use their resources, facilities, and land management responsibilities to expand knowledge of pollinator health and to increase habitat quality and availability. While the DEIS acknowledges the importance of native pollinators to specific plant species, it is unclear what potential adverse impacts may occur to pollinators from proposed herbicide/pesticide use associated with the initial action.... We recommend the NPS include, where appropriate in the FEIS,...best management practices to support pollinator health and affected ecosystems."
- "The project proposes to treat invasive plants with herbicide (page: 169). We recommend that the FEIS clearly identify which herbicide or pesticide products, if any, would be approved for use and in which areas. We recommend that the NPS include a commitment in the FEIS to adhere to pesticide label directions for any pesticide or herbicide application. We also recommend that the FEIS specify appropriate buffer zones to protect water quality from any pesticide/herbicide applications. We recommend that the FEIS describe how pesticide mixing and storage areas would be sited and managed to further protect water sources and other sensitive areas, such as food source and/or herb gathering areas."

NPS Response:

The General Management Plan is a long-term planning document for the park and does not, as such, include the detailed analysis and information requested.

The park is committed to ecosystem restoration and protection, which benefits insect and bird pollinators and their habitats. Specific projects undergo project-level compliance to ensure mitigation measures are included to protect natural and cultural resources. The park also works with outside researchers to identify risks to pollinators.

Invasive species are a top threat to native ecosystems (including pollinators) worldwide, and particularly in Hawai'i. Within the park, invasive species are treated with pesticide, where appropriate, using trained applicators. The park is committed to

consistent adherence with label and worker safety requirements. No restricted use herbicides are used to control invasive vegetation. The invasive plant control program does not treat invasive aquatic vegetation, and never applies herbicides near streams, standing water, or any location below the high tide mark. All herbicides and pesticides are stored in a secure facility in a developed sector of the park, away from visitors, and the majority of mixing occurs at this site. Any mixing in the field occurs in bins to guard against a spill. Detailed information on specific herbicides and pesticides and application of such is addressed by project-specific compliance.

Concern 28:

The GMP needs to explain the rationale for identifying specific indicators and standards for monitoring the acoustic environment at Hawai'i Volcanoes National Park (reference to User Capacity (pages 162-164 and Appendix G)).

Representative Comments:

- "The NPS should state if it believes ANY air tours are appropriate use (including constructive use of soundscape, i.e., impact on natural quiet) in the wild/primitive zone."
- "The NPS should usefully offer further rationale as to WHY it set said standard at 1.0 dBA difference between natural and ambient dBA.... The rational might state if for any reason the 1.0 dBA standard is Park-specific? Or would it be a reasonable standard appropriate to apply in other Parks with Wild/Primitive Zoning?"
- "The NPS should explain whether/how current acoustical measurement technology is available to capture this 1.0 dBA difference accurately, reliably over time, and defensibly against challenge by such as motorized/commercial sources."
- "The NPS is invited to address how this 1.0 dBA standard is to be applied. Is it a standard for 'Desired Conditions'? Is it a standard for identifying 'Unacceptable Impacts' vs. 'Major Adverse'; or 'Major Adverse' vs. 'Moderate Adverse'."

NPS Response:

The indicators and standards for identifying carrying capacity (subject of these comments) in a GMP do not typically contain the level of detail requested by the comments above (see page 162 for a full description of defining user capacity within Hawai'i Volcanoes National Park). That said, the following information and responses should provide clarification on the indicator and standard (associated with soundscapes and the acoustic environment) identified for protecting the visitor experience within the wild/primitive zone developed in the GMP.

Director's Order 41, Wilderness Stewardship states that "Commercial air tours are inconsistent with preservation of wilderness character" (DO 41, 16). The GMP affirms this statement (although not all lands within the wild/primitive zone are designated wilderness in the preferred alternative, page 118) by clarifying that visitor activities within the wild/primitive zone "are unstructured, self-guided, and human-powered...Activities do not degrade the integrity of resources or compromise wilderness values...Typical activities include hiking, camping, backpacking, equestrian, lava viewing, route finding, exploring, and cultural demonstrations, and include some stewardship programs consistent with wilderness values" (page 93). The GMP also establishes desired conditions and indicators and standards for the wild/primitive zone to ensure management action is taken before impacts from visitor use unacceptably impact natural and cultural resources and the visitor experience in these areas of the park. See also page 90 for a description of the desired conditions for soundscapes within the wild and primitive zone.

Within the wild/primitive zone, the park has identified soundscapes and the acoustic environment, specifically the difference between existing and natural ambient sound levels, as an important indicator for measuring impacts to the visitor experience from overall visitor use in these areas of the park. The standard established for this zone is a minimum of 1 dBA mean difference between natural and existing ambient dBA (L50). This park-specific standard (1 dBA mean difference) was identified based on the lack of existing human caused noise sources (such as noise from road traffic or high altitude commercial jets) in the wild/primitive zone in the park as documented in acoustic measurements taken at the park between 2002 and 2013 (USDOT-FAA 2006, NPS 2008, NPS 2013c). During these measurement periods, the existing sound levels generally differed from the predicted natural sound level by less than 1.0 dBA during the

day; so by using 1.0 dBA in the primitive zone, the park would be preserving the existing condition. If this standard is met or exceeded, the park could implement the management actions identified on page 446 to minimize impacts and protect the visitor experience within this zone.

This standard would be monitored through the development and implementation of a soundscape monitoring program (identified in the GMP on page 141) that would largely be based on previous acoustic monitoring in the park in 2002, 2003, 2008, and 2013 (page 243) and on the scientific methods and technology identified by the NPS Natural Sounds and Night Skies Division for acoustic monitoring within units of the national park system. While this division has developed soundscape modeling to inform planning processes across the country, the indicator and standard identified in this plan would be based on actual acoustic measurements in the field that would be consistently applied over time - in specific locations and at specific intervals established by the soundscape monitoring program and associated protocols.

Again, this 1.0 dBA standard would serve as an indicator for taking management action to prevent further impacts, rather than defining the intensity of impacts, to the visitor experience. For example, the NPS could establish a long-term acoustic monitoring site at measurement site 8C (identified through monitoring in 2002 and 2003; page 245) where NPS staff would complete acoustic monitoring several times a year following protocols established under the soundscape monitoring program. Using the data collected from a sound level meter, staff would identify the mean difference between natural and ambient dBA (L50) within this zone for the monitoring period. If this mean is greater than 1 dBA -- which could be impacted by a number of factors such as development outside the park, visitor use, commercial air tours, or administrative flights, etc. -- the park would consider the following management actions depending on the source of the issue: 1) educate visitors about soundscapes in the park; 2) educate visitors about self-noise at night-time near eruptive areas; 3) enforce noise ordinances 36 CFR Section 2.12; 4) implement temporary or long-term standoffs for aircraft; 5) reduce noise caused by administrative activities; and 6) limit administrative use of aircraft in the area (see page 446).

Concern 29:

The GMP needs to explain the rationale for identifying specific indicators and standards for monitoring fire risk at Hawai‘i Volcanoes National Park (reference to User Capacity).

Representative Comment:

- “The number of human-caused fires reported is not a useful indicator for “fire risk” (page 440). While this is a simple metric, the simple occurrence of a fire only indicates the effectiveness of the fire prevention program. More useful indicator(s) would tie together fire occurrence, fuel beds that are conducive to spread and/or resistant to control, fire indices at time of ignition, and proximity of ignition to at-risk resources (e.g. structures, invasive species, etc)....Since you are also concerned about natural ignitions, which account for approximately half of the fires in HAVO, I would advise against ignoring them when evaluating fire risk. Fires, regardless of cause, have similar effects. Given the concern about invasive species, and the greatly increased flammability of the Park over the past 100-years that has accompanied the spread of those species, every fire should be considered for some level of suppression.”

NPS Response:

Visitor use in the park, including additional public use at Kahuku over time, may result in more human-caused fires, which would trigger an action under Table G.1. Indicators, Standards, Management Strategies, and Monitoring Strategies. Fire risk in this table is specifically related to human-caused fires, not natural ignitions. This table is intended to guide park management when a threshold is triggered as described under the ‘Standard’ and is only related to impacts related to human use of the park (see also pages 162-163). This does not mean that these are the only things the park considers in its fire management program. The park’s Fire Management Plan (see page 36) took the various indicators of fire risk into account when developing the Fire Management Units and fire management strategies.

At this time, all fires are closely monitored and receive a full suppression response to protect human life, property, and cultural resources, as well as limit the spread of invasive species and the loss of native plant communities. Limited exceptions are made for small isolated kīpukas where fire poses

no threat to park resources or human life and when the information gained from fire effects studies will benefit overall fire management in the park. The park evaluates the effectiveness of fuels treatment and restoration projects in determining if we are moving toward the park's desired condition for fire management (page 57) and native vegetation (page 58). This evaluation may result in changes in management strategies over time.

Concern 30:

Mitigations need to be established to protect resources from the spread of invasive species within the park, especially as the preferred alternative would expand human use in Kahuku.

Representative Comments:

- "Also boot/shoe brushes for when visitors hike to areas like Mauna Ulu and Kilauea Iki. Supplemented by informational displays on why it is important to brush shoes before hiking into these areas. This could help with reducing the spread of invasives especially grasses."
- "The park needs to plan in advance for keeping ants and other invasive insects and plants out of pristine areas.... If these areas are going to be opened to the public, how will ants be kept out?"

NPS Response:

The locations of boot/shoe brush stations within the park is an operational issue and can be expanded as managers evaluate the need for additional locations. The park has Invasive Species Standard Operating Procedures which outline procedures necessary to reduce the risk of introducing invasive species. Other management tools can be used to reduce the risk of introductions. For example, under the preferred alternative, no vehicles, bicycles, or horses are allowed west of Upper Glover or above 1916 flows to the east to reduce risk of new introductions. Any new trails will undergo planning and compliance where mitigations and monitoring will be outlined in advance. In addition, the park currently monitors key invasive species and takes management actions when necessary.

CLIMATE CHANGE (5 COMMENTS)

Concern 31:

Increase recycling opportunities for visitors.

Representative Comment:

- "This may not apply to this type of plan, but I've always thought that there should be more visible areas for recycling for visitors. I do not think that those few "Hi 5" recycling containers (which do not seem to be clearly marked) that are sometimes located adjacent to trash containers to be sufficient."

NPS Response:

Any improvements made to solid waste collection within the park are primarily operational in nature and could be made at any time outside the purview of the GMP. That said, the GMP includes guidance for park managers to increase conservation and sustainability (page 145).

BOUNDARIES (14 COMMENTS)

Concern 32:

The highest priority for acquisition is the Pōhue Bay Parcel.

Representative Comment:

- "Pōhue/Makai Kahuku between KS lands south east and Kawanakoa to northwest along coast below Hawn Ranchos = highest priority (higher than Great Crack)."

NPS Response:

The Pōhue Bay, Great Crack, and Ala Waiʻi Holdings parcels, which are all identified within the Analysis of Boundary Modification and Land Protection (Appendix E in the GMP), are part of a Land and Water Conservation Fund Collaborative Landscapes Proposal and are identified as priority acquisitions.

PARTNERS (7 COMMENTS)

Concern 33:

More native Hawaiians need to become involved in the park in order to connect native Hawaiians with their culture and heritage and to improve the visitor experience.

Representative Comments:

- "More native Hawaiians need to become involved in the park. The park should work with the University of Hawaiʻi and or Kamehameha Schools to make the park part of the curriculum for their studies and or degrees. A once a week hula show for an hour is not enough to connect native Hawaiians with their culture and heritage."

- "Also, visitors want to experience the park with native Hawaiians, like how many of us would rather speak with Native Americans when visiting the Grand Canyon or Yellowstone."

NPS Response:
Specific hiring processes and partnerships are operational and are not within the scope of a GMP. That said, the park currently (as of December 2015) employs several people of Native Hawaiian ancestry in various positions in the park. In addition, the park implements a number of proactive methods to involve more Native Hawaiians, cultural practitioners, and other local youth and adults in its operations. For example, the Kahuku Unit has a special hiring authority that allows them to hire directly from the local communities near Kahuku. The park partners with Friends of Hawai'i Volcanoes National Park and Hawai'i Pacific Parks Association to provide a summer internship program through the Youth Internship Ranger Program. In 2015, this program provided 28 local high school and college youth with the opportunity to work for and learn about the park. The park provides many cultural programs throughout the month, in addition to the regular hula program. The park meets with the park's Kupuna Consultation Group to discuss proposed projects and plans in the park and get their input and feedback. These are just some of the methods the park uses to involve Native Hawaiians, cultural practitioners, and other local community members in the protection and management of the park. The park will continue to investigate ways to further involve local community members.

COMMERCIAL SERVICES (2 COMMENTS)

Concern 34:

Please do not allow any more commercial services or concessions within the park due to their impacts to Native Hawaiian cultural practitioners.

Representative Comment:

- "Impacts of visual disfigurement allowing commercial activities at the eternal home of Tutu Pele (aka Hawai'i Volcanoes National Park) are disconcerting at best. More on par with exasperating, upholding the sacred religious practices of the Native Hawaiian people/Pele Practitioner's. Religions around the world are not subject to commercialization. Why in Hawai'i Nei? Please, no new commercial services or concessions!"

NPS Response:
The GMP includes a Commercial Services Strategy (Appendix F) that identifies criteria for evaluating whether or not a type of commercial service is appropriate and/or necessary within Hawai'i Volcanoes National Park (see page 419 for a further explanation). According to this strategy, all commercial services within the park must:

- be consistent with laws, regulations, and policies;
- not compromise public health and safety;
- not significantly impact or impair park resources or values;
- not unduly conflict with other park uses and activities;
- not exclude the public from participating in similar recreational opportunities.

Therefore, the park can deny permits to any commercial services that do not meet these criteria. Although this strategy identifies commercial services that are not appropriate within the park due to potential impacts they have on park resources or public safety (see pages 421-422), this strategy does not identify a limit to the number of commercial services allowed in the park. Should limits be needed for things like ensuring visitor safety or resource protection, etc., the park could complete a commercial services plan, or similar analysis, that would rely on monitoring data within the park to help establish these limits. This commercial services plan, or another plan such as a wilderness stewardship plan, could also include a determination of extent necessary for providing commercial services in wilderness.

AIR TOURS (9 COMMENTS)

Concern 35:

The alternatives should provide general guidance for noise and wilderness issues concerning park overflights.

Representative Comments:

- "The preferred alternative fails to provide the general guidance that is needed for noise and wilderness issues concerning park overflights."
- "[T]he plans I submitted to reasonably and fairly deal with the air tour problem on November 30, 2011 were completely ignored. This is a violation of NEPA requirements to consider all proposed alternatives."

NPS Response:
General management plans provide broad management guidance for a park, but often recommend the development of other plans to address more specific issues that would demand more extensive information and analysis, such as air tour management. For years, the park has recognized the need for and has worked towards completion of an Air Tour Management Plan (ATMP) (page 39). The GMP reinforces this need by also identifying and calling for the completion of an ATMP/EIS "that would develop measures to limit or prevent any significant impacts that may be caused by commercial air tour operations upon the natural and cultural resources, or visitor experiences at the park" (page 141). This plan is the appropriate venue for identifying and evaluating the alternatives suggested by this commenter, which are outside the scope of a typical GMP.

That said, the GMP does provide general guidance on noise and wilderness issues that are impacted by park overflights and identifies several actions to protect the acoustic environment and wilderness as they relate to overflights, including: 1) implementing temporary or long-term standoffs for aircraft in sensitive areas; 2) providing commercial air tour operators with information and training on wilderness boundaries and the location of these sensitive areas; and 3) calling for acoustic monitoring, with associated indicators and standards for taking management action, and a possible soundscape management plan (page 141 and 446).

Concern 36:
The current number of air tours over Hawai'i Volcanoes National Park are adversely impacting soundscapes, wilderness, neighboring communities, and environmental justice. The Draft GMP/WS/EIS needs to assess impacts to these resources from this use.

Representative Comments:
- "I do not believe that the importance of the acoustical environment has been adequately discussed. I am especially dismayed that this document does not even mention the damage done to our island by air tour operations the park is profiting from. This failure to take the NEPA requirement of accepting responsibility for auxiliary effects of park programs on the surrounding neighborhoods into consideration jeopardizes the validity of the entire plan."
- "I do not feel any of these alternatives adequately address the environmental impacts HVNP administrators' policies and management practices are having on our park and the surrounding neighborhoods, either now or in the future." [Related to impacts from Air Tours]
- "The devastating effects of the park's air tours and aviation operations are centered over the socially and economically disadvantaged population of the District of Puna and the Keaukaha Hawaiian Homesteads. Yet the topic of Environmental Justice was dismissed from this analysis. This is another violation of NEPA requirements."

NPS Response:
Environmental impact statements "must take a 'hard look' at impacts that alternatives under consideration would have on the human environment if implemented" (DO12 Handbook, 61). While this plan identifies the need for an ATMP, none of the alternatives propose actions that would directly increase air tours within the park which could, as the comments above suggest, further impact the resources mentioned above. The EIS associated with this GMP only assesses impacts to resources that could be impacted by the alternatives in the plan. The GMP does not assess impacts to minorities and low-income populations and communities because "The actions evaluated in this document would not have an effect (either beneficial or adverse) on socially or economically disadvantaged populations" (page 34).

Furthermore, because alternatives in the GMP would impact soundscapes, wilderness, and adjacent land management, the document discusses cumulative impacts to these resources from activities like air tours within the park (see pages 306 and 309 for cumulative impacts to wilderness and the acoustic environment from commercial air tours).

Concern 37:
Hawai'i Volcanoes National Park should implement monitoring for air tours over the park.

Representative Comments:
- "[I]t is essential that the park staff develop a system to monitor and ensure compliance to the established regulations [for air tours] whatever

direction you choose to take our park. I certainly hope these suggestions will help you to make wise choices when deciding how to manage the future of our precious wilderness areas."

NPS Response:
The airspace above the park is under the jurisdiction of the Federal Aviation Administration. The NPS currently monitors the number of air tours over Hawai'i Volcanoes National Park through interim operating authority (IOA) reports that commercial air tour operations are required to submit under the FAA Modernization and Reform Act of 2012 (amended the National Parks Air Tour Management Act of 2000).

While the GMP calls for additional monitoring of the acoustic environment, the monitoring that is requested in the above comment would be addressed and identified in an Air Tour Management Plan or other specific planning document regarding air tours. The GMP identifies the need for such a plan.

PLANNING PROCESS (12 COMMENTS)

Concern 38:

The results of consultations with Native Hawaiian stakeholders should be included in the FEIS.

Representative Comments:

- "EPA encourages the NPS to ensure that meaningful consultation with all potentially affected Native Hawaiian stakeholders occurs throughout the NEPA process. The project area is culturally and spiritually important to Native Hawaiians and consultation is an important component of the decision-making process associated with this project. We recommend that the results of consultations with Native Hawaiian stakeholders be included in the FEIS."

NPS Response:
The following information will be included within the Record of Decision that will document the NPS decision on the proposals evaluated in this Abbreviated Final and associated Draft GMP/WS/EIS.

Consultation with Native Hawaiians has been a key component of this planning process as it is both mandated by the National Historic Preservation Act (Section 106) and informative for identifying and reviewing proposed actions as they relate to cultural and natural resources within the park. A description of the consultation process with Native Hawaiians from project initiation up to the release of the Draft GMP/WS/EIS is described on page 353 in the Draft GMP/WS/EIS.

To continue consultation on the Draft GMP/WS/EIS, the park mailed Native Hawaiian individuals and organizations on the park's NHPA Section 106 mailing list 1) a cover letter announcing the release of the document, explaining the plan and the planning/commenting process, requesting consultation, and inviting the recipient to attend a Kupuna meeting or the public talk story session; 2) a newsletter that fully outlined the three alternatives in the plan, encouraged the public to participate in the planning process, and included notification of the talk story session and wilderness hearing; and 3) a CD-ROM electronic version of the full Draft GMP/WS/EIS for their review. The park then hosted a Kupuna meeting on June 9, 2015 at the Kilauea Military Camp (in the park). At this meeting, the park planner presented information on the GMP and the preferred alternative, and the park's Native Hawaiian liaison encouraged attendees to send comments to her, mail in comment sheets, or submit comments online on the project website. Some provided positive feedback on the preferred alternative, and two people asked questions: 1) about the status of the facility at the end of Chain of Craters Road, and 2) about the potential disposition of Jaggar Museum.

The park did not receive any formal comments from individuals or organizations that are part of the Kupuna Consultation Group on the Draft GMP/WS/EIS.

Concern 39:

It was difficult to navigate the document and find information needed. It was difficult to determine the date and time of the public meeting.

Representative Comments:

- "This is a heavy and cumbersome book."
- "Not enough info to make informed comment (between the alternatives)."

NPS Response:
To comply with regulations and NPS policies, environmental impact statements, especially those associated with general management plans, are typically long and complex documents that can be challenging to navigate for those not familiar with the organization and scope of these documents. To make the documents easier to navigate, the full GMP includes a detailed table of contents, an index in the back, and a "how to use and comment on this plan" section within the first few pages of the document. The online version of the document, which has been available to the public since the public review period opened on May 1, 2015, is also bookmarked for easier navigation. The planning team also put together an executive summary of the plan (Newsletter #4) to share with the public via mail and the park's and plan's websites, and provided more succinct information about the alternatives and overall plan in the form of posters at the talk story session.

The NPS announced the public release of the Draft GMP/WS/EIS, invited public comments, and notified the public of the talk story session and wilderness hearing through a notice in the *Federal Register*, press releases, websites, social media, and mailings, which included a 16-page newsletter (Newsletter #4) sent to over 800 people on the park's mailing list and available on the project website. The newsletter fully outlined the three alternatives in the plan, encouraged the public to participate in the planning process, and included notification of the correct time and date of the talk story session and wilderness hearing. It also included phone numbers for how to reach key planning staff to ask questions about the plan.

ERRATA: CHANGES AND CLARIFICATIONS TO THE DRAFT GMP/WS/EIS

This section contains those changes that should be made to the Draft GMP/WS/EIS. Some of these changes are a result of public comments while others are editorial in nature. If text has a strikethrough the text, it is deleted from the text; if it is underlined, it is added text.

Page xviii, last paragraph under Actions Common to All Alternatives; Page xxii, last paragraph under Chain of Craters Road; Page xxv, under Chain of Craters Road; Page 102 under Chain of Craters Road; Page 108, last paragraph under End of Chain of Craters Road; and Page 127, last paragraph under End of Chain of Craters Road

- **Change text:** A 5.5 mile segment of the Chain of Craters Road that ran through the park towards Kalapana was buried by lava flows generated by Pu‘u ‘Ō‘ō. Due to a change in the direction of the lava flow in 2014, an unpaved emergency access route was constructed - following the historic road alignment. Due to commitments made by the NPS during the construction of this road (County of Hawai‘i funded the construction of this route with the anticipation of being reimbursed by FEMA; FEMA includes specific mandates in their funding), the NPS is responsible for ensuring that the route is protected and maintained as an emergency access route regardless of temporary uses like trail access. ~~This route is for emergency access only.~~ When this route is not needed as an emergency access route~~no longer needed for emergency access~~, it c~~w~~ould be used as a trail~~an equestrian, biking, and hiking trail~~ (similar in character and functionality to the Escape Road from the summit to Mauna Ulu) to provide a quality non-motorized visitor use opportunity while ensuring the route is protected and maintained for its original intent. These uses would ensure that natural values are not compromised ~~and future emergency route without compromising natural values and~~ without adding the management complexity of managing a coastal entrance for public vehicles to enter the park.

Page 121, second paragraph under Kīlauea Visitor Center

- **Change text:** The covered outdoor lanai at Kīlauea Visitor Center offers 24-hour trip planning and orientation. To provide more interpretive space on the often crowded lanai, the park would consider either expanding the lanai itself or removing and replacing the current restroom ~~would be removed and replaced~~ with a facility of similar capacity behind the visitor center and closer to the 1877 Volcano House, where Volcano Art Center Gallery is located. Relocating the restrooms would lessen the noise level and reduce congestion in this visitor use area, improving the experience for visitors using the displays and attending interpretive programs and information sessions on the lanai. The relocated restrooms would also replace the restrooms near the 1877 Volcano House building and may include a covered walkway to provide rain-free path to the restrooms. However, simply expanding the lanai may be less costly and require less ground disturbance than relocating the restrooms while still accomplishing the goal to increase the interpretive space outside the visitor center. Considering the potential benefits and impacts from implementing these various alternatives, the park would assess these alternatives through the completion of the site plan for the complex of buildings on the summit of Kīlauea.

Page 179, second sentence under Kīlauea Visitor Center

- **Change text:** To provide more interpretive space, consider either expanding the lanai itself or removing and replacing the current restrooms~~Remove the current restroom and replace~~ with a facility of similar capacity behind the visitor center and closer to the 1877 Volcano House.

Page 373, Hawai‘i Volcanoes National Park Adjustment Act of 2000 (P.L. 10-510)

- **Change text:** “Public Law 87-278 (75 Stat. 577) is amended by striking “~~Hawai‘i~~Hawaii Volcanoes National Park” each place it appears and inserting “~~Hawai`i~~Hawai‘i Volcanoes National Park...Any reference in any law (other than this Act), regulation, document, record, map, or other paper of the United States to “~~Hawai‘i~~Hawaii Volcanoes National Park” shall be considered a reference to “~~Hawai`i~~Hawai‘i Volcanoes National Park”

- All apostrophes within Hawaiian words shall be changed to an ʻokina (ʻ) in this section.

Page 374, Hawaiʻi Volcanoes National Park Adjustment Act of 2000 (P.L. 10-510)

- **Change text:** "(a) Section 401(8) of the National Parks and Recreation Act of 1978 (Public Law 96~-25; 92 Stat. 3489) is amended by striking "~~Hawai`i~~Hawaii Volcanoes" each place it appears and inserting "~~Hawai`i~~Hawaiʻi Volcanoes"."
- **Change text:** "(b) The first section of Public Law 94?-667 (90 Stat. 2692)"
- All apostrophes within Hawaiian words shall be changed to an okina (ʻ) in this section.

Page 444-446

- Change all references to temporary flight restrictions (TFRs) to temporary standoffs for aircraft.

Page 465, Hoawa

- **Correct spelling:** Remove Hawaiian diacritical from the word hawaiʻiense in both the header and the text. Correct species name is: *Pittosporum hawaiiense*.

Page 481, Preparers and Consultants

- Add "Kahuku Site Manager" after "Keola Awong"
- Change "David Benite" to "David Benitez"
- Add ʻokina to "Nainoa Keanaʻaina"
- Add "(Retired)" after "Bill Leek, Landscape Architect"
- Add "(Retired)" after "Talmadge Magno, Chief Ranger, Visitor and Resource Protection"
- Add makron to "Kūpono McDaniel"
- Add "(Retired)" after "Walt Poole, Concessions Management Specialist"
- Add "(Retired)" after "Rita Pregana, Kahuku Site Manager"

Page 483, Glossary, Caldera

- **Change text:** "Calderas are large geologic depressions that are found only at the very summit of volcanoes. A caldera is a large, usually circular depression. It is formed by collapses or large explosions at the center of the volcano~~forms over ten of thousands of years and can change in shape with the likes of one large eruption~~."

Page 486, Glossary, Talk-Story Session

- **Change text:** "~~Known in Hawaiʻi as moʻolelo, is the tradition of personally sharing important stories to preserve them for future generations.~~ The phrase is ~~also~~ often used in Hawaiʻi to connotate general chatting, gossiping, or "shooting the breeze." A talk-story session in the case of this general management plan is an open house-style meeting, where people can talk to subject matter experts, as well as other participants."

Page 492, Selected Bibliography, Bio, K.

- **Correct spelling:** Yoshioka~~o~~.

Page 500, Selected Bibliography

- **Add the following bibliographic sources to the Selected Bibliography:**
  - » National Park Service, U.S. Department of the Interior (NPS). 2015. *Director's Order 12 NEPA Handbook*. Washington, DC: Office of Policy. September 2015. Available at <http://www.nps.gov/applications/npspolicy/DOrders.cfm>. Accessed 15 October 2015.
  - » National Park Service, U.S. Department of the Interior (NPS). 2013b. *Director's Order 41: Wilderness Stewardship*. Washington, DC: Office of Policy. 13 May 2013. Available at <http://www.nps.gov/policy/DOrders/DO_41.pdf>. Accessed 15 October 2015.
  - » National Park Service, U.S. Department of the Interior (NPS). 2013c. Hawaii Volcanoes National Park Acoustical Monitoring Snapshot. Fall 2013. NPS Natural Sounds and Night Skies Division. 6 pgs.

Page 509, Index

- **Add text to beginning of Index:** "The spelling of geographic locations in this document is based on the Geographic Names Information System (GNIS), which is official vehicle for geographic names use by the Federal Government and the source for applying geographic names to Federal maps & other printed and electronic products."
- **Correct spelling of all instances:** ʻāhinahina.
- **Correct spelling of all instances:** ~~k~~Kaʻūpūlehu
- **Correct spelling of all instances:** Kīpuka ~~K~~kī
- **Correct spelling of all instances:** Kipuka-~~N~~nēnē Campground

Page 510, Index

- **Correct spelling of all instances:** Kuūlanaokuaiki Campground
- **Correct spelling of all instances:** Kuūpaʻianahaā
- **Correct spelling of all instances:** ʻŌohiʻa Wing
- **Correct spelling of all instances:** ʻōlapa

APPENDIX A: AGENCY AND ORGANIZATION COMMENTS

PEPC Project ID: 24888, DocumentID: 64395
Correspondence: 8

Author Information

Keep Private:	No
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Status: Reviewed	Park Correspondence Log:
Date Sent: 06/05/2015	Date Received: 06/05/2015
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Topic Question 1:
Alternative 2 since it is the park's preferred alternative but this is conditioned on including language pertaining the Ala Kahakai NHT cited in the No Action Alternative under section, Trails: Hiking Biking and Equestrian, page 113(top) where it mentions HAVO working with ALKA staff on the establishment of the ALKA in the park. This is not mentioned in the same section in the Preferred Alternative - Alternative 2.

Topic Question 2:
To reiterate, inclusion of the ALKA in the Preferred Alternative is actually mandated by Public Law 106-509 which established the ALKA corridor within all NPS units on Hawaii Island. As such it needs to be included in all Alternatives.

Topic Question 4:
None

Topic Question 5:
To re-reiterate, inclusion of the ALKA in the Preferred Alternative is actually mandated by Public Law 106-509 which established the ALKA corridor within all NPS units on Hawaii Island. As such it needs to be included in all Alternatives. ALKA and HAVO will be better enabled to establish the ALKA in the park when it is cited as requested above in the Final GMP.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 2, 2015

7.8.15

Cindy Orlando, Superintendent
Hawaii Volcanoes National Park
Attn: DEIS—GMP, P.O. Box 52
Hawaii National Park, HI 96718-0052

Subject: Draft Environmental Impact Statement/General Management Plan /Wilderness Study, for the Hawaii Volcanoes National Park Project, Hawaii. (CEQ# 20150117).

Dear Mrs. Orlando:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Hawaii Volcanoes National Park Project, Hawaii. Our review is provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

EPA supports the National Park Service's goals of protecting fundamental resources, such as marine, terrestrial, cultural and archeological assets. Based on our review of the DEIS, we have rated the proposed project as Lack of Objections (LO), please see the enclosed Summary of EPA Rating Definitions. Our rating is based on the Preferred Alternative 2, which promotes preservation of Hawaii Volcanoes National Park's Native Hawaiian values while strengthening and broadening opportunities to connect people with the park's volcanic treasures.

The project proposes to treat invasive plants with herbicide (page: 169). We recommend that the FEIS clearly identify which herbicide or pesticide products, if any, would be approved for use and in which areas. We recommend that the NPS include a commitment in the FEIS to adhere to pesticide label directions for any pesticide or herbicide application. We also recommend that the FEIS specify appropriate buffer zones to protect water quality from any pesticide/herbicide applications. We recommend that the FEIS describe how pesticide mixing and storage areas would be sited and managed to further protect water sources and other sensitive areas, such as food source and/or herb gathering areas.

On June 20, 2014, President Obama issued a memorandum directing Federal departments and agencies to evaluate and use their resources, facilities, and land management responsibilities to expand knowledge of pollinator health and to increase habitat quality and availability. While the DEIS acknowledges the importance of native pollinators to specific plant species, it is unclear what potential adverse impacts may occur to pollinators from proposed herbicide/pesticide use associated with the initial action. In May 2015, the Forest Service released a draft document in response to the President's memorandum, titled "Pollinator-Friendly Best Management Practices

for Federal Lands", which states that "Eight broad considerations are key when evaluating projects for conserving pollinator habitat:

- determining the quality of foraging habitat;
- identifying important pollinator reproduction sites;
- determining important nesting and overwintering sites;
- identifying pollinators of sensitive or at-risk plant species on Federal, State, local, or nongovernmental organization (NGO) (e.g., NatureServe) lists as outlined in the National Academy of Sciences report Status of Pollinators in North America.
- identifying and removing invasive species to improve pollinator habitat;
- identifying, collecting, and using local, genetically appropriate native seeds;
- implementing adaptive management; and
- engaging and informing the public."

We recommend the NPS include, where appropriate in the FEIS, include similar best management practices to support pollinator health and affected ecosystems.

EPA encourages the NPS to ensure that meaningful consultation with all potentially affected Native Hawaiian stakeholders throughout the NEPA process. The project area is culturally and spiritually important to Native Hawaiian's and consultation is an important component of the decision-making process associated with this project. We recommend that the results of consultations with Native Hawaiian stakeholders be included in the FEIS.

The proposed action could result in some new facilities, such as education pavilions campgrounds and picnic areas (page 293). EPA encourages the NPS to include a commitment to the development of sustainable green infrastructure as a guiding principle for future developments in the park.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

For

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

PEPC Project ID: 24888, DocumentID: 64395
Correspondence: 19

Author Information

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Correspondence Information

Status: Reviewed	Park Correspondence Log:
Date Sent: 06/30/2015	Date Received: 06/30/2015
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Topic Question 1:
Alternative 3. I have visited the park many times in the past year and found the Visitor experience (outside the park) to be completely focused on a few information displays with long drives in between each stop. The rangers are very helpful at VIS but when visitor's are driving on the road, all they have is a copy of the park map to not only guide them but entirely instruct them what they are seeing. I encourage HVNP administration to see the visitor's experience as not a limited to each stop but rather the very first minute they arrive at the park up until the last minute when they leave the park; basically their entire driving experience.

I realize there is a plethora of books that help explain all that is to see at the park but sadly to say, it is very hard for visitors to read a book while they are driving. Or even to spend their precious time at the park pouring over the amazing back-stories of the park and all it's volcanic history.

In my extensive research of the park, I have found many fascinating features in the park that are not clearly described prior to or during the visitors's driving experience. Without the visitor's understanding the back-story and significance of each crater and volcanic occurrence, what they see has far less meaning. We need to connect the stories with the place in real time to make them have more meaning.

I feel strongly that the park needs to explore new ways to connect visitors with how they experience the park in between each major stop, bringing a deeper understanding on every level - geologically, biologically and culturally.

I propose that HVNP consider the pairing of mobile technology with an audio narrated experience to be the way in which we can elevate and enhance the overall experience of visitors to the park, especially as they drive.

Topic Question 2:
Audio tours are not something that is new. HVNP uses wands with displays as VIS with mixed results. Mount Rushmore on the other hand has incorporated an audio tour into its very operations creating an additional revenue source and an improved visitor's experience for many years with great success.

The problem with the Mount Rushmore model is the initial purchase and the ongoing maintenance of the hardware. With the technology nowadays, all of that has changed.
Majority of people both domestic and international now carry their own smartphone with sophisticated GPS technology that can support a data-free offline map and an audio-based driving experience.

Great Smokey Mountain National Park has already partnered to build a mobile app for its park on both Android and iOS.

Topic Question 3:
I have read it and it appears to thoroughly address all impacts to each resource and how they are being managed.

Topic Question 4:
Again, I have read it and it appears all in order.

Topic Question 5:
In my experience as a outside business seeking to work with the HVNP in forming a partnership, I found the staff and bureaucracy surrounding the staff to be non-conducive in seeding and maturing meaningful partnerships. In my many attempts to try to communicate and propose mutually beneficial partnerships with HVNP (as I will explain below), the only response I received was to speak to this person or that. It seemed that no one had any incentive or motivation to directly consider outside proposals because it seemed to be outside their normal scope of work, despite any benefits it would bring to Visitors.

This is taken from the NPS website about partnerships:

"Partnerships are encouraged throughout the government as a way of leveraging resources and accomplishing more than anyone group could do on its own. We need to exponentially grow partnering awareness, skills and management capacity. This is only possible through highly motivated and empowered NPS employees and a supportive organizational culture.

Partnership management has become a core competency to carry out our NPS mission and deliver public service at a higher level. Our challenge is to more effectively grow that competency by building on past partnership successes and develop new capacity servicewide. Our management challenge at every level is to effectively align and leverage resources to enable NPS employees and partners to create and sustain more effective partnerships."

http://www.nps.gov/partnerships/about.htm

Comments: This is my experience in trying to work with HVNP:

I initally contacted park rangers who forwarded my information to HPPA. I sent over a detailed proposal to HPPA outlining an idea to rent GPS devices with installed audio-based driving tour in multiple languages (as I have done for many years on all the islands). I then meet in person with them. There seemed to be initial interest but it feel apart when HPPA tried to further the discussion through the Director of Marketing, the Chief of Interpretation and the Operations Manager. From start to finish I went back and forth with HPPA and some NPS staff for over a year to try and move the proposal forward with no success.

In the meantime my company has moved forward without NPS support in writing an extensive script narration that covers the entire Hawaii Volcanoes National Park that is to be released as an offline mobile app in September of 2015. This app will be a driving tour that visitors can download to their smartphones and experience as they drive through the park. There are still opportunities to work together if there is interest.

But my hope in writing this is not for my company but for HVNP to change the way in which it handles and vets partnerships in the future. It is especially important to effectively use outside partnership as a source of innovation in times of budget cuts and fewer park rangers.
">

PEPC Project ID: 24888, DocumentID: 64395
Correspondence: 13

Author Information

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Correspondence Information

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Date Sent: 06/22/2015	Date Received: 06/22/2015
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Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Topic Question 1:
We like alternative #2 - Nahukus parking situation needs to be addressed as the big buses and vans take up all the space! The idea for a cultural museum at the Ohia Wing is also great. More Hawaiian people working in the park should also be a priority.

Topic Question 2:
There needs to be more rubbish and recycling at locations like the steam vent parking lot and devastation trail. Also more covered picnic areas around the summit and on chain or craters road. More paths for bicycles to continue to promote eco-friendly ways to explore the park!

Topic Question 3:
The culture should always come first from our perspective. Respect for place and people thru in depth education. Also boot/shoe brushes for when visitors hike to areas like Mauna Ulu and Kilauea Iki. Supplemented by informational displays on why it is important to brush shoes before hiking into these areas. This could help with reducing the spread of invasives especially grasses.

Topic Question 4:
No.

Topic Question 5:
This park does a great job, and we hope to continue to see staff focus on cultural interpretation. Having visitors learn about how special this National Park is seems to be a top priority. Continue to promote sustainability thru concepts like re-useable water bottles, and hiking/biking as opposed to driving around in a car all day. Reduce waste by NOT allowing the hundreds of styrofoam lunches that many of the big bus tours use every single day!

Eco friendly shuttle services would be great, and even shuttle between Volcano Village and the National Park would be nice to see.

Comments: You all do a great job with such a massive and culturally significant resource, keep up the good work!!
">

PEPC Project ID: 24888, DocumentID: 64395
Correspondence: 7

Author Information

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Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Topic Question 1:
Alternative 2: It seems to strike the correct balance.

Topic Question 2:
I find the preferred alternative quite comprehensive.

Topic Question 3:
No.

Topic Question 4:
No.

Topic Question 5:
The inclusion of the two Kahuku parcels, the 222 acre parcel and the coastline parcel from Pohue Bay, are extraordinary potential additions to the Park. The coastline area has absolutely amazing petroglyphs and Hawaiian habitation sites, much of which was well documented by Kenneth Emory of Bishop Museum and later by Violet Hansen in the '60's with some very interesting interpretations of a few petroglyphs by Ruth Knudsen Hanner of Kauai. I have some of Violet's work left to me by Violet which I would happily give access to anyone who is interested. Most of the information is I believe also at the Bishop Museum. If the Park is able to incorporate these parcels into the Kahuku Unit, it would be a marvelous legacy for the people of Hawaii as well as visitors.

Comments:
">

PEPC Project ID: 24888, DocumentID: 64395
Correspondence: 17

Author Information

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Correspondence Information

Status: Reviewed	Park Correspondence Log:
Date Sent: 06/30/2015	Date Received: 06/30/2015
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Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Topic Question 1:
not applicable - deferred to Hawaii Chapter

Topic Question 2:
not applicable - deferred to chapter

Topic Question 3:
not applicable

Topic Question 4:
see response to Question 5 below

Topic Question 5:
see response below, added under "Comments"

Comments:

We are VERY SUPPORTIVE of any/all attempts by the National Park Service to ensure appropriate use , and appropriate, strong environmental soundscape standards, for wild/primitive zones of the park. In this way, it becomes much easier to avoid Impairment of said zones.

These comments and questions thus pertain to wilderness character (i.e., "solitude") preservation goals and Standards for the "Wild/Primitive" Zone. They refer to the Table G.1 in Appendix G, Page 446.

(excerpted here is taken from Table G.1 but with added ** asterisk markings , to identify the particular points of comment and questioning)

Table G.1. Indicators, Standards, Management Strategies, and Monitoring Strategies

Indicator Topic

Indicator

Indicator Rationale

Zone

Standard

Standard Rationale

Management Strategies

Monitoring Strategies and Timeline

Soundscapes and the Acoustic Environment

**Difference between existing and natural ambient sound levels - Mean L50 Impact (dBA) **

WILD/PRIMITIVE ZONE

Mean difference between natural and ambient dBA (L50) is not more than 1.0 dBA.

**This standard is set to ensure that natural sounds dominate the soundscape. Distant artificial sounds may be heard in some areas of this zone. Human-caused noise should be rare or very infrequent in occurrence and in limited areas of the zone. Pristine soundscapes should occur in some areas of this zone. **

COMMENT, RESUMED:

1. The NPS should (1) state if it believes ANY air tours are appropriate use (including constructive use of soundscape, i.e., impact on natural quiet) in the wild/primitive zone. NPS Director's revised Order on Wilderness Stewardship says air tours are NOT appropriate use in such zones because of negative impact on wilderness character, i.e., on "solitude"; if so, that should be re-articulated for Hawaii Volcanoes National Park, specifically.

2. The NPS should re-affirm the excerpted Wild/Primitive Acoustic standard above, that the standard is no noise difference more than 1.0 dBA.

3. The NPS should usefully offer further rationale as to WHY it set said standard at 1.0 dBA difference between natural and ambient dBA. (As opposed to say, 1.5 dBA or 3 dBA, for example).

3a. The rational might state if for any reason the 1.0 dBA standard is Park-specific? Or would it be a reasonable standard appropriate to apply in other Parks with Wild/Primitive Zoning? If not, why is this particular unit-of-difference being applied specifically for Hawaii Volcanoes National Park?

4. the NPS should explain whether/how current acoustical measurement technology is available to capture this 1.0 dBA difference accurately, reliably over time, and defensibly against challenge by such as motorized/commercial sources.

This answer should address both using *acoustic modelling* techniques, and *acoustic measurement* techniques in the field. It should address the costs and practicability of doing sufficient measurements, over time, needed to defensibly enforce the Standard.

5. The NPS is invited to address how this 1.0 dBA standard is to be applied.
Is it a standard for "Desired Conditions"? Is it a standard for identifying "Unacceptable Impacts" vs. "Major Adverse" ; or "Major Adverse" vs. "Moderate Adverse".

NPS should explain with a *case example* or two, if possible, how this standard would be applied.

For example, it could use aircraft noise data from its own management aircraft operations, or it could compute aircraft noise based on commercial air tours in the vicinity. This is reasonable, because NPS itself indicates that it would like to address commercial air tour management, via an ATMP, in the future, and, thus expressing this Standard is therefore relevant as a key step, right now. At least this much preparation could be very helpful/supportive to the next planning steps, in documents to come such as GMP, or Soundscape Management Plan, or ATMP.

(Our assumption is "Existing Ambient" noise levels (elevating the "Natural Ambient") noise levels would be primarily or solely increased by commercial air tours, in substantial areas of the Wild/Primitive Zones. (Since there is virtually nothing else of mechanized noise to be heard in said areas.)
If this is not a correct assumption, we invite further NPS statement or clarification.)

Thank you for attending to this response.

Dick Hingson, noise/aviation analyst for the Sierra Club's National Parks and Monuments Committee, which has approved my forwarding of this comment.
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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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Native old growth rain forest in ʻŌlaʻa Unit. *NPS photo.*

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Rainbow over Halemaʻumaʻu Vent and Kīlauea Caldera. *Photo by Peter Anderson*

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