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

Cindy Orlando, Superintendent
Hawai`i Volcanoes National Park
P.O. Box 52
Hawaii National Park, HI 96718-0052

Subject: Draft Environmental Impact Statement for the Protecting and Restoring Native Ecosystems By Managing Non-Native Ungulates Project, Hawai'i Volcanoes National Park, Hawai'i County, Hawai'i. (CEQ# 20110390).

Dear Ms. Orlando:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Protecting and Restoring Native Ecosystems By Managing Non-Native Ungulates Project pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA supports an innovative plan to refine strategies to reduce non-native ungulate populations with the goal of protecting native ecosystems and through recovery and restoration of native vegetation and other natural resources. We have rated the DEIS LO, Lack of Objections (see enclosed EPA Rating Definitions). Our rating is based on the Preferred Alternative D which gives the most flexibility for management of non-native ungulates including non-lethal methods.

EPA applauds the minimization of impacts to the environment which were developed after informal consultation with the United States Fish and Wildlife Service, (p. 55-58). Specifically, EPA supports the use of design and placement strategies for fencing that will reduce impacts to bats/birds and avoid sensitive nesting areas. Similarly, we encourage the National Park Service (NPS) to utilize mitigation practices as proposed in chapter 2 that would avoid endangered or rare species of vegetation near fence lines by limiting impacts to a four foot corridor along the fence line and only removing trees less than six inches in diameter.

EPA appreciates the NPS plan to "pursue opportunities to salvage and donate meat," (p. 235). We suggest the Final Environmental Impact Statement (FEIS) identify specific communities that would benefit from these practices and include a plan to coordinate with these communities to facilitate the most practicable plan to maximize opportunities for donation.

We appreciate the opportunity to review the DEIS. When the FEIS is released, please send one hard copy and one electronic copy to the address above (mail code: CED-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) 972-3800 or munson.james@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures:
Summary of EPA Rating Definitions

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