

US EPA ARCHIVE DOCUMENT



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

January 3, 2012

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](mailto:munson.james@epa.gov).

Sincerely,

/s/

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

Enclosures:  
Summary of EPA Rating Definitions