

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA

P.O. BOX 621  
HONOLULU, HAWAII 96809

DAWN N.S. CHANG  
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BOARD OF LAND AND NATURAL RESOURCES  
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RYAN K.P. KANAKA'OLE  
FIRST DEPUTY

CIARA W.K. KAHAHANE  
DEPUTY DIRECTOR - WATER

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ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

January 27, 2026

Director  
Environmental Review Program  
Office of Planning and Sustainable Development, State of Hawai'i  
P.O. Box 2359  
Honolulu, Hawai'i 96804-2359

Dear Director:

With this letter, the Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR-DOFAW) hereby transmits the final environmental assessment and finding of no significant impact (FEA-FONSI) for the Ka'ū Forest Reserve Fenceline Access Project Extension. The project area is situated at TMK: (3) 9-7-001:001, in the Ka'ū District on the Island of Hawai'i.

Enclosed is the FEA-FONSI. This letter will accompany the electronic submittal of a completed HRS Chapter 343 Publication Submittal Form. DLNR-DOFAW intends for these documents to be published in the next available edition of The Environmental Notice.

If there are any questions, please contact Emma Yuen at 808-587-4170, or [emma.yuen@hawaii.gov](mailto:emma.yuen@hawaii.gov).

Sincerely,

DES

A handwritten signature in black ink, appearing to read 'Ryan K.P. Kanaka'ole'.

01/30/2026

Ryan K.P. Kanaka'ole  
Acting Chairperson  
Board of Land and Natural Resources

Date

Enclosure: FEA-FONSI, Ka'ū Forest Reserve Fenceline Access Project Extension

**From:** [dbedt.opsd.erp@hawaii.gov](mailto:dbedt.opsd.erp@hawaii.gov)  
**To:** [DBEDT OPSD Environmental Review Program](#)  
**Subject:** New online submission for The Environmental Notice  
**Date:** Wednesday, February 4, 2026 3:02:38 PM

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**Action Name**

Ka'ū Forest Reserve Fenceline Access Project Extension

**Type of Document/Determination**

Final environmental assessment and finding of no significant impact (FEA-FONSI)

**HRS §343-5(a) Trigger(s)**

- (1) Propose the use of state or county lands or the use of state or county funds
- (2) Propose any use within any land classified as a conservation district

**Judicial district**

Ka'ū, Hawai'i

**Tax Map Key(s) (TMK(s))**

(3) 9-7-001:001

**Action type**

Agency

**Other required permits and approvals**

Various

**Proposing/determining agency**

Department of Land and Natural Resources

**Agency jurisdiction**

State of Hawai'i

**Agency contact name**

Emma Yuen

**Agency contact email (for info about the action)**

[emma.yuen@hawaii.gov](mailto:emma.yuen@hawaii.gov)

**Agency contact phone**

(808) 587-4170

**Agency address**

1151 Punchbowl Street, Rm 325  
Honolulu, Hawai'i 96813  
United States  
[Map It](#)

**Is there a consultant for this action?**

No

## Action summary

The overall purpose of the road and grubbing project is to facilitate native ecosystem preservation of the Ka'ū Forest Reserve on Hawai'i Island. To gain access for the maintenance of a hooved-animal-proof fence, the Division of Forestry and Wildlife proposes creating a road with a bulldozer. The Division is avoiding impact to sensitive ecosystems by locating the proposed activities on an area primarily composed of lava from the 1950 flow. The proposed road corridor is approximately 0.78 miles (1258.77 meters) long. The road will be installed in a remote area of the Ka'ū Forest Reserve that borders Hawai'i Volcanoes National Park. This project is an extension of the Ka'ū Forest Reserve Fenceline Access Project, which creates a road corridor approximately 1.3 miles long in the adjacent finger of the 1950 lava flow. Lengths are approximate and subject to change.

## Reasons supporting determination

Please refer to the Significance Criteria section in the Environmental Assessment.

## Attached documents (signed agency letter & EA/EIS)

- [Kau-Access-Extension\\_Agency-Letter\\_Final-Environmental-Assessment\\_ocr.pdf](#)

## ADA Compliance certification (HRS §368-1.5):

The authorized individual listed below acknowledges that they retain the responsibility for ADA compliance and are knowingly submitting documents that are unlocked, searchable, and may not be in an ADA compliant format for publication. Audio files do not include transcripts, captions, or alternative descriptions. The project files will be published without further ADA compliance changes from ERP, with the following statement included below the project summary in The Environmental Notice: "If you are experiencing any ADA compliance issues with the above project, please contact (authorized individual submitting the project at email)."

## Shapefile

- The location map for this Final EA is the same as the location map for the associated Draft EA.

## Action location map

- [KauExtensionRoad\\_Buffer\\_export\\_ERP.zip](#)

## Authorized individual

Emma Yuen

## Authorized individual email

[emma.yuen@hawaii.gov](mailto:emma.yuen@hawaii.gov)

## Authorized individual phone

(808) 587-4170

## Authorization

- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

**FINAL ENVIRONMENTAL ASSESSMENT**

**KA‘Ū**

**FOREST RESERVE**

**FENCELINE ACCESS PROJECT EXTENSION**

In accordance with

**CHAPTER 343, HAWAI‘I REVISED STATUTES**

Proposed by:

State of Hawai‘i  
Department of Land and Natural Resources  
Division of Forestry and Wildlife  
Forest Reserves System

**Project Name:** Ka‘ū Forest Reserve  
Fenceline Access Project Extension

**Project Location:** Ka‘ū Forest Reserve, Ka‘ū District, Hawai‘i  
TMK: (3) 9-7:001:001

**Applicant:** State of Hawai‘i  
Department of Land and Natural Resources  
Division of Forestry and Wildlife

**Approving Agency:** State of Hawai‘i  
Department of Land and Natural Resources

**Parties Consulted**

Federal:	U.S. Department of Interior Fish and Wildlife Service National Park Service USGS, Biological Resources Division
State:	Department of Land and Natural Resources Historic Preservation Division Aha Moku Hawai‘i Island Councilmember Office of Hawaiian Affairs Senator Dru Kanuha Representative Jeanne Kapela
County:	Planning Department
Private:	Bishop Museum Conservation Council for Hawai‘i Earthjustice Legal Defense Fund Hawai‘i Audubon Society Native Hawaiian Legal Corporation Sierra Club, Moku Loa Group The Nature Conservancy of Hawai‘i Three Mountain Alliance Watershed Partnership

**Permits Required:** Programmatic Site Plan Approval (SPA) ST 17-26  
HRS Section 6E Consultation – No Impact to Historic Properties  
NPDES General Permit – Discharges of Storm Water Associated  
with Construction Activities  
Hawai‘i County Grubbing Permit

## **Project Description**

### Summary:

The overall purpose of the road and grubbing project is to facilitate native ecosystem preservation of the Ka'ū Forest Reserve on Hawai'i Island. To gain access for the maintenance of a hooved-animal-proof fence, the Division proposes creating a road with a bulldozer. The Division is avoiding impact to sensitive ecosystems by locating the proposed activities on an area primarily composed of lava from the 1950 flow. The proposed road corridor is approximately 0.78 miles (1258.77 meters) long. The road will be installed in a remote area of the Ka'ū Forest Reserve that borders Hawai'i Volcanoes National Park. This project is an extension of the Ka'ū Forest Reserve Fenceline Access Project, which creates a road corridor approximately 1.3 miles long in the adjacent finger of the 1950 lava flow. Lengths are approximate and subject to change.

In addition to saving time for conducting natural resource management such as invasive species control and tree planting, this road will reduce the amount of time needed to respond to emergencies like wildfires in this area. Positive social impacts from this project include protection and restoration of a unique Hawaiian forest; and the preservation of a remnant of our rapidly disappearing natural heritage.

The project area is located entirely within the boundaries of the Ka'ū Forest Reserve. All project lands are State owned and within the Conservation District, Protected Subzone.



Figure 1. Location of the proposed project, denoted as a bright red line, in the Ka'ū Forest Reserve

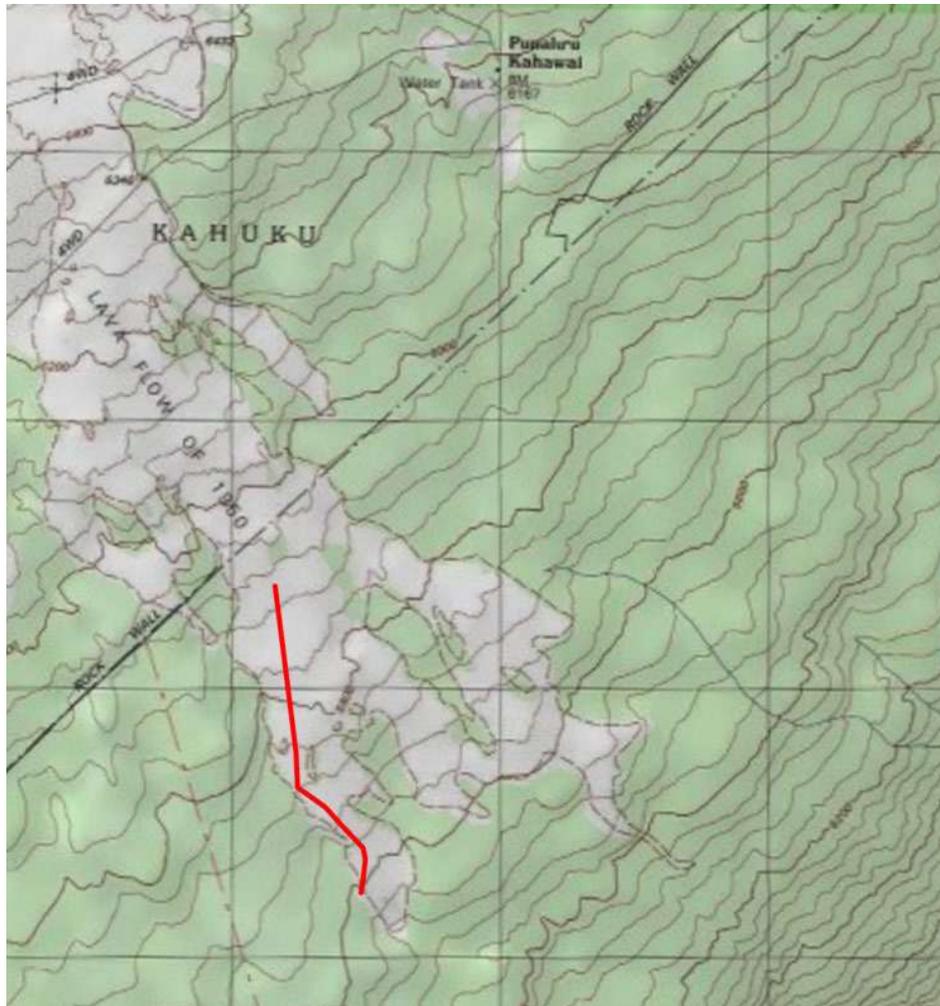


Figure 2. Close up topographical map of the proposed project in the Ka'ū Forest Reserve

The publication of an environmental assessment is triggered by the proposed grubbing activity to bulldoze an area. Only grubbing projects that disturb less than an acre are candidates to be exempt from the preparation of an environmental assessment, per the DLNR exemption list reviewed and concurred by the Environmental Council on November 20, 2020. Funding needed for this project is minimal and comes from existing State general funds allocated to the salaries of the Division's heavy equipment operators.

### **Affected Environment**

This project is on the southeastern slope of Mauna Loa, from approximately 5,600 feet to 5,900 feet elevation. Most of the Reserve is vegetated by a mosaic of different aged stands of 'ōhi'a (*Metrosideros polymorpha*) forest on various substrates. The upper boundary where the new road is proposed is covered by the historic 1950 flow; these are in the early stages of forest development.

*Flora:*

There is little vegetation in the northern area proposed for the road because it is sited on a recent lava flow.

*Fauna:*

There are likely very few native animals in the area proposed for the road because it is sited on a recent lava flow and in areas of lower biodiversity. The project will avoid damage to native birds by avoiding destruction of large native trees. Native invertebrates may be impacted during the clearing of the bulldozed section. See Appendix A for a list of bird species recorded from the Ka'ū Forest Reserve.

Although little is known about them, the 'opeapea, or Hawaiian bat (Lasiurus cinereus semotus), and may use trees within the Reserve as roosting sites. The proposed bulldozing of the fenceline section will occur outside of bat pupping season (June 1 to September 15) to avoid damaging roosting trees.

*Significant & Sensitive Habitats:*

The areas proposed for road building and grubbing are carefully designed to avoid significant or sensitive habitats.

Many other locations within the Reserve that this project will benefit can be considered a sensitive habitat, particularly for native forest birds and rare plants.

*Archaeological Sites:*

No archaeological sites have been observed in the areas where the proposed activity would take place. The road construction proposed will take place on recent lava flows and very remote sections of forest minimizing the likelihood that historic sites will be affected. A review of historical literature does not indicate the area proposed for bulldozing contains any historic features as it is a remote wilderness area. This project proposal has been sent to the State Historical Preservation Division to concur with the Division's recommendation that no historic properties will be impacted.

## **Impacts Resulting from Project**

*Short Term Impacts:*

The primary short-term environmental impacts from this project will be those associated with improvement of roads and grubbing. This will include the use of a bulldozer, with a blade of 16 feet wide, to assist with the grubbing. This clearing will cause soil disturbance and include noise disturbance from the bulldozer, however this area is very remote and will not be within hearing range of any community. The crew will be required to follow the contract sanitation protocol which requires dedicated gear to prevent the spread of alien plant species and rapid 'ōhi'a death Ceratostyis fungus.

*Long Term Impacts:*

Most significant are greater potential for inadvertent introduction of new weed species, and further spread of non-native plants already present in the Reserve.

Constructing new roads and cleared areas may affect the “wilderness” character of this remote area. However, a new road may be beneficial by increasing the ability to manage this area for native ecosystem protection. In addition to saving time for routing natural resource management such as invasive species control and fence maintenance, this road will reduce the amount of time needed to respond to emergencies like wildfires in this area.

Long-term benefits of this project include improved access to manage the fenced area. The fenced area is anticipated to have high levels of regeneration.

*Climate change impacts:*

The project will result in minimal emissions from the operation of heavy machinery during the course of approximately two-five weeks. However, it is anticipated that the project will overall reduce emissions because it will create a more direct access to the Reserve, and there will be a reduced reliance on helicopters to ferry staff and materials to the region since more of the Reserve will be easily accessed with a vehicle.

*Socio-economic impacts:*

Minimal costs are associated with this project. They include paying bulldozer operators and vehicle operating expenses. These monies will come from normal operating funds, which have already been obligated.

*Cultural impact assessment:*

Pre-contact Hawaiian use of upland forests such as those in Ka‘ū was likely limited to activities such as gathering plant materials, and bird-catching. A cultural study has been prepared and is included in this Environmental Assessment as Appendix B. Based on the study, this project is not anticipated to have any negative effects on cultural activities. This determination was made by analyzing the ethnographic and oral history interviews, as well as historical cultural source materials listed in the cultural study. The project is anticipated to benefit the native Hawaiian plants and birds traditionally gathered in this region.

**Mitigation Measures**

Damage to living native plants will be restricted to within the road/clearing corridors, and no living trees greater than 12 inches diameter will be cut. No legally protected plant species have been observed near the proposed road or clearing corridor,

but an additional reconnaissance of all corridors will be made before work begins. Significant plants will be marked with flagging, and/or alignments will be shifted to avoid damage.

Weed and rapid 'ōhi'a death introduction will be minimized by ensuring that all heavy equipment, tools, boots, etc. have been cleaned before entering the project area. The long-term management plan for the Reserve includes regular monitoring and control of newly introduced species of non-native plants along fence lines and access roads.

No archaeological sites have been seen within the area to be disturbed by this project. Road and clearing alignments are chosen to utilize previously disturbed or barren areas wherever possible. Should any sites be discovered during construction, work will be halted and the proper authorities notified.

Additionally, DOFAW will follow the avoidance and minimization measures provided by the USFWS (see Appendix F).

### **Alternatives to Project**

#### Alternative #1:

Proceed with the project. This would have multiple benefits for natural resource management of the Reserve. In addition to saving time for routine natural resource management such as invasive species control, this road will reduce the amount of time needed to respond to emergencies like wildfires in this area. This road would significantly decrease staff time and cost to access this area, therefore increasing capacity for natural resource management crews to dedicate to protecting this area.

This is the preferred alternative, as it the most feasible.

#### Alternative #2:

No action. Without the road, there would be significantly higher costs to the management of the Reserve. Staff and contractors may need to rely more heavily on helicopters, increasing use of fuel and greenhouse gas emissions, noise disturbance, and further exposing staff to safety risks of aviation. Staff would not be able to quickly access this area to respond to wildfires.

### **Significance Criteria**

HAR Section 11-200.1-13 requires an agency to determine whether an action may have a significant effect on the environment, by considering every phase of a proposed action, the expected impacts, and the proposed mitigation measures, including:

- (1) Irrevocably commit a natural, cultural, or historic resource;

This project avoids significant natural, cultural, or historic resources by siting the project primarily on a lava flow that has less diversity and vegetation.

(2) Curtail the range of beneficial uses of the environment;

This project will not curtail beneficial uses such as watershed values or native habitat because it is a relatively small area and is sited in an area with less biodiversity. Instead, this project is meant to improve beneficial uses of the environment by improving access for natural resource management crews.

(3) Conflict with the State's environmental policies or long-term environmental goals established by law;

This project does not conflict with the State's environmental policies or goals, rather it supports the goal to protect and manage watershed forests.

(4) Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;

This project will not have an adverse effect on the economic welfare, social welfare or cultural practices. Rather, it seeks to improve welfare and cultural practices by protecting watershed forests which provide many economic services and also contain plants and animals important to the perpetuation of cultural practices.

(5) Have a substantial adverse effect on public health;

This project will benefit public health because it will facilitate a project to remove hooved animals from watershed forests. These hooved animals are known to carry and spread various diseases such as *Leptospirosis* and nontuberculous mycobacterial lung disease.

(6) Involve adverse secondary impacts, such as population changes or effects on public facilities;

This project is in a remote location and will not impact populations or facilities.

(7) Involve a substantial degradation of environmental quality;

This project will help natural resource managers improve environmental quality by responding to wildfires and removing invasive species.

(8) Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions;

This is a small and independent project that does not affect or commit larger actions.

(9) Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat;

The location of this project seeks to avoid rare, threatened, or endangered species, or their habitat and will include biological surveys to confirm that no rare species will be impacted.

(10) Have a substantial adverse effect on air or water quality or ambient noise levels;

This project does not affect air or water quality or ambient noise levels as it is in a remote location.

(11) Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

This project will not have a substantial adverse effect on or likely to suffer damage by being located in an environmentally sensitive area because it is located in an area that is primarily a low-biodiversity lava flow.

(12) Have a substantial adverse effect on scenic vistas and view planes, during day or night, identified in county or state plans or studies;

This project is very remote and will not be visible from any important view planes.

(13) Require substantial energy consumption or emit substantial greenhouse gases.

This project will use negligible amounts of energy and will emit negligible greenhouse gases where small amounts of vegetation will be cleared.

### **Expected Determination**

No significant negative impact on the environment is expected from this project. A Finding of No Significant Impacts is issued.

### **Findings and Reasons Supporting Expected Determination**

The intent of this project is to benefit native species in the project area. Staff will carefully survey the road and areas proposed to be cleared to prevent destruction of rare species. Additionally, the area proposed to be cleared is already primarily non-native forest and will be routed to prevent damage to the remaining native trees present in that section.

The short-term damage to vegetation as a result of clearing will be offset by the improved management access for natural resource crews. These actions will enable the crews to benefit the native ecosystems.

**Environmental Assessment Prepared By:**

Zachary King  
The Research Corporation of the University of Hawai'i  
Division of Forestry and Wildlife  
1151 Punchbowl St. Honolulu, HI 96813  
E-mail: [zachary.n.king@hawaii.gov](mailto:zachary.n.king@hawaii.gov)  
Phone: (808) 587-0061

**Sources of Information:**

Ka'ū Forest Reserve Management Plan and Environmental Assessment, 2012  
[Kau FR Mgnt Plan 2012.pdf \(hawaii.gov\)](#)

## Appendix A

Native birds historically and/or currently found in or near Ka'ū Forest Reserve:

Species	Scientific Name	Island Distribution	Federal Status*	State Status*
Nēnē or Hawaiian Goose	<i>Branta sandvicensis</i>	H, K, M, Mo	LE	LE
‘Ua‘u or Hawaiian Petrel	<i>Pterodroma sandwichesis</i>	H, L, K, M	T	LE
‘Akē‘akē or Band-rumped Storm Petrel	<i>Oceanodroma castro</i>	H, K	C	LE
Kōlea or Pacific Golden Plover	<i>Pluvialis fulva</i>	Throughout Hawai‘i	MBTA	Indigenous
‘Io or Hawaiian Hawk	<i>Buteo solitarius</i>	H	MBTA	LE
Pueo or Hawaiian Short-eared Owl	<i>Asio flammeus sandwichensis</i>	Throughout Hawai‘i	MBTA	Endemic
‘Alalā or Hawaiian Crow	<i>Corvus hawaiiensis</i>	Captivity	LE	LE
Hawai‘i ‘Elepaio	<i>Chasiempis sandwichensis</i>	H	-	Endemic
‘Ōma‘o	<i>Myadestes obscurus</i>	H	MBTA	Endemic
Hawai‘i ‘Amakihi	<i>Hemignathus virens</i>	H, M, Mo	MBTA	Endemic
‘Akiapōlā‘au	<i>Hemignathus munroi</i>	H	LE	LE
Hawai‘i Creeper	<i>Oreomystis mana</i>	H	LE	LE
Hawai‘i ‘Ākepa	<i>Loxops coccinea</i>	H	LE	LE
‘I‘iwi	<i>Vestiaria coccinea</i>	H, K, O, M, Mo	T	Endemic
‘Apapane	<i>Himatione sanguinea</i>	Throughout Hawai‘i	MBTA	Endemic

\*Key to Federal and State Status:

- Listed Endangered (LE) = Taxa listed as endangered.
- Threatened (T) = Taxa listed as threatened.
- Candidate (C) = Taxa for which substantial information on biological vulnerability and threat(s) support proposals to list them as threatened or endangered.
- Migratory Bird Treaty Act (MBTA) = It is illegal to harass or kill birds listed under the MBTA.
- Endemic and Indigenous species are protected under Hawai‘i Revised Statutes 183D and 195D.

## Appendix B

Cultural Impact Assessment for the Ka'ū Forest Reserve, Ka'ū District, Island of Hawai'i – prepared for the Division of Forestry and Wildlife by Kumu Pono Associates, 2004.

Available at: [2012-10-23-HA-FEA-Kau-Forest-Reserve-Management-Plan.pdf](#)  
([hawaii.gov](#))

## Appendix C

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA

DIVISION OF FORESTRY AND WILDLIFE  
1151 PUNCHBOWL STREET, ROOM 325  
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FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

October 17, 2025

To Whom it May Concern,

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR-DOFAW) is proposing to clear an access corridor in the Ka'ū Forest Reserve on Hawai'i Island. The proposed management road will provide access for wildfire fighting and other management activities. The access corridor is proposed in an area of relatively low natural resource conservation value to have the least impact on the native ecosystem as possible.

The Draft Environmental Assessment for this project is available at the following link:

Ka'ū Forest Reserve Fenceline Access Project Extension

[https://dlnr.hawaii.gov/ecosystems/files/2025/10/DEA-Agency-Letter\\_Kau-Extension-Road-part-2-signed.pdf](https://dlnr.hawaii.gov/ecosystems/files/2025/10/DEA-Agency-Letter_Kau-Extension-Road-part-2-signed.pdf)

This document will also be published in an upcoming issue of The Environmental Notice, published by the Office of Planning and Sustainable Development. If you require a hard copy of this document, please notify [Emma.Yuen@hawaii.gov](mailto:Emma.Yuen@hawaii.gov) or call (808) 587-4170 by December 12, 2025. Please submit any comments to [Emma.Yuen@hawaii.gov](mailto:Emma.Yuen@hawaii.gov) by December 23, 2025.

Sincerely,

DGS



Dawn N. S. Chang  
Chairperson

Signature:



Email: david.g.smith@hawaii.gov

## Appendix D

**King, Zachary N**

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**From:** King, Zachary N  
**Sent:** Wednesday, November 26, 2025 10:23 AM  
**To:** Kaweni Ibarra  
**Cc:** Kamakana Ferreira; Yuen, Emma  
**Subject:** RE: OHA Comment Re: Draft EA for Access Corridor in Kau Forest Reserve, Hawaii

Aloha Kaweni,

Our response to your requests will be mailed today. If you don't receive the letter by 12/5, please let me know.

Thank you!

**Zachary King**

**HCRI**

**Social Science Research Institute**

**University of Hawai'i**

**On contract to Division of Forestry and Wildlife**

[znking@hawaii.edu](mailto:znking@hawaii.edu) / [zachary.n.king@hawaii.gov](mailto:zachary.n.king@hawaii.gov)

Disclaimer: The originator of this correspondence does not have the authority to obligate the government. The email is for informational or coordination purposes only.

---

**From:** Yuen, Emma <[emma.yuen@hawaii.gov](mailto:emma.yuen@hawaii.gov)>  
**Sent:** Thursday, November 20, 2025 1:29 PM  
**To:** Kaweni Ibarra <[kawenii@oha.org](mailto:kawenii@oha.org)>  
**Cc:** Kamakana Ferreira <[kamakanaf@oha.org](mailto:kamakanaf@oha.org)>; King, Zachary N <[zachary.n.king@hawaii.gov](mailto:zachary.n.king@hawaii.gov)>  
**Subject:** RE: OHA Comment Re: Draft EA for Access Corridor in Kau Forest Reserve, Hawaii

Mahalo Kaweni,

Our staff, Zachary King, cc'd, will be sending our response.

---

**From:** Kaweni Ibarra <[kawenii@oha.org](mailto:kawenii@oha.org)>  
**Sent:** Thursday, November 20, 2025 12:34 PM  
**To:** Yuen, Emma <[emma.yuen@hawaii.gov](mailto:emma.yuen@hawaii.gov)>  
**Cc:** Kamakana Ferreira <[kamakanaf@oha.org](mailto:kamakanaf@oha.org)>  
**Subject:** [EXTERNAL] OHA Comment Re: Draft EA for Access Corridor in Kau Forest Reserve, Hawaii

Aloha e Emma,

The Office of Hawaiian Affairs (OHA) is in receipt of your letter dated December 23, 2025, notifying us of the release of a Draft Environmental Assessment (DEA) for an access corridor within the Ka'u Forest Reserve, Hawai'i [TMK (3)9-7-001: 001]. The DEA was prepared by the Division of Forestry and Wildlife (DOFAW) in accordance with Hawai'i Revised Statutes (HRS) Chapter 343.

At this time, OHA would like to inquire whether consultation has continued with any community members since the 2012 Final Environmental Assessment (FEA) prepared for the Ka'u Forest Reserve Management Plan that is referenced within the current DEA? If not, we suggest re-engaging consulting parties to inform them of the currently proposed project.

OHA would also like to request more information about materials that will be used for the proposed access road (i.e. gravel, pavement, etc.).

Further, will any materials need to be removed for transporting machinery to the project area and staging areas?

Per the DEA, HRS 6E consultation resulted in a finding of No Impact to Historic Properties. OHA requests more information about the results of the HRS 6E consultation (i.e. consulting parties, documentation, etc.). OHA also requests to be provided with copies of any current and future comments provided by the State Historic Preservation Division (SHPD).

Mahalo for your time. We look forward to receiving the requested information. Please feel free to contact me should you have any questions.

Mahalo,

Kaweni Ibarra

***Kaweni Ibarra***

Compliance Advocate

Office of Hawaiian Affairs



JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
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December 1, 2025

Kaweni Ibarra, Compliance Advocate  
Office of Hawaiian Affairs  
560 N. Nimitz Hwy #200  
Honolulu, HI 96817

Dear Mr. Ibarra,

Thank you for your emailed comments regarding the Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR-DOFAW) proposed access corridor project in the Ka'ū Forest Reserve on Hawai'i Island.

DLNR-DOFAW will contact the individuals and organizations that were listed in the 2012 Environmental Assessment (EA)\* as entities contacted, if their contact information is still available and the entity is still in existence. Please note, however, that the 2012 EA was for a much more expansive project that included multiple actions over 60,000 acres spanning the entire Ka'ū Forest Reserve. The subject of the access corridor project is limited to a very small area that is inaccessible to the general public.

\*Individuals and Organizations Contacted for the 2012 EA:

- Discovery Harbor Community Association
- Ka 'Ohana o Honu'apo
- Ka'ū Preservation
- Ka'ū Agricultural Water Co-op Steering Committee
- Ka'ū Chamber of Commerce
- Landowners Edward Olson Trust/Monica Mallick, EWM, C. Manfredi, Kamehameha Schools
- Ocean View Community Association/Community Development Corporation/Ocean View Ranchos Community Association
- O Ka'ū Kakou
- Ranchers Lani Petrie, Wally Andrade, Alfred and Michelle Galimba, and Kyle Soares
- Sierra Club, Moku Loa Group
- Three Mountain Alliance

No materials will be transported or removed during the access corridor project. The access corridor will be created by a bulldozer compacting existing lava.

As requested, we've attached the applicable 6E documents to this letter as attachments. Please let us know if you have additional questions or comments.

Sincerely,

Emma Yuen  
Native Ecosystems Program Manager  
Division of Forestry and Wildlife

Attachments:  
6E Request for Concurrence  
SHPD Review

**JOSH GREEN, M.D.**  
GOVERNOR | KE KIA'ĀINA

**SYLVIA LUKE**  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA**

**DIVISION OF FORESTRY AND WILDLIFE  
1151 PUNCHBOWL STREET, ROOM 325  
HONOLULU, HAWAII 96813**

**DAWN N.S. CHANG**  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**RYAN K.P. KANAKA'OLE**  
FIRST DEPUTY

**CIARA W.K. KAHAHANE**  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

To: State Historic Preservation Division  
Via HICRIS

From: Emma Yuen, Native Ecosystems Program Manager  
Division of Forestry and Wildlife  
Department of Land and Natural Resources

Date: July 31, 2025

Re: Section 6E-8 Review – Division of Forestry and Wildlife  
Ka'ū Forest Reserve Fenceline Access Project Extension – Ka'ū District, Hawai'i,  
TMK (3) 9-7-001:001 (por.)

The Department of Land and Natural Resources Division of Forestry and Wildlife (DOFAW) requests concurrence from the State Historic Preservation Division (SHPD) that no historic properties will be affected by the subject project, and completion of the Section 6E-8 consultation process.

#### Project Description

DOFAW proposes to construct a road corridor to improve access and facilitate native ecosystem preservation within the Ka'ū Forest Reserve. The proposed road corridor will be installed atop the 1950 lava flow. The road corridor will measure approximately 0.78 miles in length and 16 feet wide. Ground disturbance will consist of grubbing the lava surface with a bulldozer to compact the crushed rock into a drivable surface. The Area of Potential Effect (APE) will comprise of approximately 1.52 acres of ground disturbance. Please note that the road corridor alignment and distance are approximate and subject to change.

#### Steps Taken to Identify Historic Properties

In accordance with HRS Section 6E, DOFAW has made a reasonable and good faith effort to carry out the requirement to document and identify any historic properties within the APE. DOFAW has reviewed available records and prior planning documents for the vicinity.

#### Identification and Inventory of Historic Properties

No historic properties were identified in the vicinity of the project. A similar access project (Project No. 2024PR00880) within a mile of the Ka'ū Forest Reserve Fenceline Access Project Extension received SHPD concurrence that no historic properties would be affected (Doc. No. 2408JG22).

Effect Determination

It is anticipated that no cultural and historic sites would be directly or indirectly affected by project activities. The potential physical impacts that the proposed action would have on the landscape, both archaeological and cultural, would be negligible. DOFAW finds “No Historic Properties Affected” pursuant to HAR §13-275-7 based on the following: 1) No historic properties have been identified in the APE; 2) pre-contact Hawaiian use of the upland forests such as Ka‘ū was likely limited to activities such as gathering plant materials and bird-catching, and therefore, the project area has a low potential to contain historic properties; 3) if historic properties are encountered while constructing the road corridor, the corridor will be adjusted to avoid them; and 4) to avoid effects, project personnel would be directed to not construct fences in areas that appear to have human made structures or formations.

If any possible evidence of past human activity, including artifact scatters, human bones, caves, rock alignments, mounds, stacked architectural features, or excavations are observed during construction, all work in the immediate area will stop and DOFAW will report the find to SHPD for assistance in determining appropriate mitigation.

Request for Concurrence

DOFAW seeks concurrence on an HRS 6E-8 project effect determination of “No Historic Properties Affected,” because no historic properties will be impacted from this project.

In accordance with HAR §13-275-7 (c)(1), your office has 45 days to object to this finding for Section 6E-8 review. Please respond within this timeframe, otherwise we will assume that you concur with our finding.

If you have any questions, please contact me at (808) 366-4788 or [Emma.Yuen@hawaii.gov](mailto:Emma.Yuen@hawaii.gov).

Sincerely,



Emma Yuen  
Native Ecosystems Program Manager  
Division of Forestry and Wildlife  
Department of Land and Natural Resources

TMK affected:  
Ka‘ū District  
TMK (3) 9-7-001:001 (por.)

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA

STATE HISTORIC PRESERVATION DIVISION  
KAKUHIHEWA BUILDING  
601 KAMOKILA BLVD, STE 555  
KAPOLEI, HAWAII 96707

DAWN N.S. CHANG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
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HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

September 11, 2025

Emma Yuen, Native Ecosystems Program Manager  
Division of Forestry and Wildlife  
Department of Land and Natural Resources  
1151 Punchbowl St. Room 325  
Honolulu, HI 96813  
Email: [emma.yuen@hawaii.gov](mailto:emma.yuen@hawaii.gov)

IN REPLY REFER TO:  
Project No. 2025PR00891  
Doc. No. 2509JG03  
Archaeology

Dear Emma Yuen:

**SUBJECT: Hawai'i Revised Statutes (HRS) §6E-8 and §6E-42 Historic Preservation Review –  
DLNR Division of Forestry and Wildlife (DOFAW)  
Kaū Forest Reserve Fenceline Access Project Extension  
Request for Concurrence with a Project Effect Determination  
Wailau, Nīnole, Ka'a Ahupua'a, Ka'ū District, Island of Hawai'i  
TMK: (3) 9-7-001:001**

This letter provides the State Historic Preservation Division's (SHPD's) review of the subject DOFAW Kaū Forest Reserve Fenceline Access Extension Project received by our office on August 5, 2025. SHPD previously requested additional information via HICRIS on August 21, 2025 (Submission No. 2025PR00891.001) and email on September 2, 2025) and received the requested information on September 3, 2025. The initial submittal included a DOFAW cover letter dated July 31, 2025 requesting SHPD's concurrence with a project effect determination of "No Historic Properties Affected," construction plans, and photos of the project area. The proposed project is subject to HRS §6E- 8 and HRS §6-42 historic preservation review. The landowner is the State of Hawaii. The DOFAW has indicated that a grubbing permit will be required for the project and that DOFAW will coordinate with the County of Hawaii for the necessary permit prior to the initiation of the project.

The DOFAW proposes to construct a road corridor within a 1.52-acre project area to improve access and facilitate native ecosystem preservation within the Ka'ū Forest Reserve. The road corridor will measure ~0.78 mi. long by 16 ft. wide. Ground disturbance will consist of grubbing with a bulldozer; the proposed road corridor will be constructed atop the 1950 lava flow. The DOFAW has indicated that the road corridor alignment and proposed distance are approximate and may be subject to change.

SHPD records indicate that the subject project area has not been included as part of any previous archaeological studies, and that no historic properties have been previously identified therein. Aerial imagery also confirms that the entirety of the proposed project area will be conducted on land that was inundated by the 1950 lava flow.

Based on the information provided above, **SHPD concurs** with a project determination of "No historic properties affected" for the subject project, pursuant to HAR §13-275-7(a)(1). Pursuant to HAR §13-275-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence and HRS 6E-8 historic preservation review ends.

**SHPD requests** the submission of the required grubbing permit prior to project initiation.

Emma Yuen  
September 11, 2025  
Page 2

The DOFAW is the office of record for this project. Please maintain a copy of this letter with your environmental review record for this project.

Please contact Joshua Gastilo at [joshua.gastilo@hawaii.gov](mailto:joshua.gastilo@hawaii.gov) for questions regarding archaeological resources or this letter.

Aloha,

A handwritten signature in black ink, appearing to read 'J. Puff', written over a circular stamp or mark.

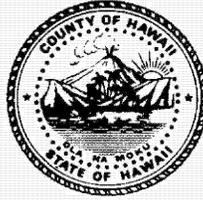
Jessica L. Puff  
Administrator, State Historic Preservation  
Deputy State Historic Preservation Officer

## Appendix E

C. Kimo Alameda, Ph.D.  
*Mayor*

William V. Brillhante, Jr.  
*Managing Director*

West Hawai'i Office  
74-5044 Ane Keohokālole Hwy  
Kailua-Kona, Hawai'i 96740  
Phone (808) 323-4770  
Fax (808) 327-3563



## County of Hawai'i PLANNING DEPARTMENT

Jeffrey W. Darrow  
*Director*

Michelle S. Ahn  
*Deputy Director*

East Hawai'i Office  
101 Pauahi Street, Suite 3  
Hilo, Hawai'i 96720  
Phone (808) 961-8288  
Fax (808) 961-8742

December 17, 2025

Department of Land and Natural Resources  
Attn: Emma Yuen  
1151 Punchbowl Street, Rm 325  
Honolulu, HI 96813

Dear Emma Yuen:

**SUBJECT: Review of Draft Environmental Assessment (PL-ENV-2025-000054)**  
**Project: Ka'ū Forest Reserve Fenceline Access Project Extension**  
**TMK: (3) 9-7-001:001**

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Thank you for your letter dated October 17, 2025, requesting comments from this office regarding the Draft Environmental Assessment (DEA) for the Ka'ū Forest Reserve Fenceline Access Project Extension project.

The Department of Land and Natural Resources (DLNR), Division of Forestry and Wildlife (DOFAW), proposes to construct and maintain an access corridor and management road within the Ka'ū Forest Reserve to support wildfire response, fence maintenance, and native ecosystem management. The proposed project involves limited bulldozing and grubbing to create an approximately 1.3-mile-long access corridor located primarily on historic 1950 lava flows and areas of relatively low biodiversity, with the intent of minimizing impacts to sensitive native ecosystems.

The project area is located entirely within the Ka'ū Forest Reserve and lies within the State Land Use Conservation District. The Planning Department acknowledges that the proposed use is consistent with the purposes of the Conservation District, particularly resource management, watershed protection, wildfire prevention, and the long-term preservation of native forest resources.

According to the County of Hawai'i General Plan 2005, amended December 2006, the property is designated as Conservation by the Land Use Pattern Allocation Guide (LUPAG) Map. Although the entire Island of Hawai'i is within the Coastal Zone Management Area, the subject area is not

Department of Land and Natural Resources  
Attn: Emma Yuen  
December 17, 2025  
Page 2

located within the Special Management Area.

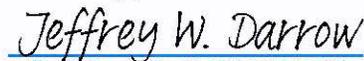
The project site is located in the Ka'ū Community Development Plan (CDP) planning area. The Ka'ū CDP was adopted by Ordinance No. 2017-66, effective as of October 17, 2017. Policy 52 of the Ka'ū CDP states *“to reinforce existing protections, the official Ka'ū CDP Land Use Policy Map designates mauka forests in Ka'ū as open space to be preserved, protected, and connected to the region's rich network of natural and cultural resources. Development and construction in mauka “Conservation” areas shall be minimized and, when necessary, limited to recreation, research, and education facilities unless otherwise permitted by law.”* Policy 62 of the Ka'ū CDP is to *“protect, preserve, and effectively manage forests, watersheds, shoreline areas, natural areas, and rare or endangered species and their habitats.”* The proposed project would be consistent with the conservation priorities in the Ka'ū CDP.

The Planning Department notes that the DEA concludes the project will not result in significant adverse environmental impacts, provided that the proposed mitigation measures are implemented. These measures include avoiding impacts to rare, threatened, and endangered species; minimizing the introduction and spread of invasive species; conducting archaeological monitoring as appropriate; and restoring disturbed areas where feasible.

We have no further comments to offer at this time. However, please provide our department with a copy of the Final Environmental Assessment for our records.

If you have any questions or if you need further assistance, please feel free to contact Kawelo Kalili at (808) 961-8145 or email [kawelo.kalili@hawaiiicounty.gov](mailto:kawelo.kalili@hawaiiicounty.gov).

Sincerely,



Jeffrey W. Darrow (Dec 17, 2025 06:22:14 HST)

JEFFREY W. DARROW

Planning Director

KK:ad

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## Appendix F



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Pacific Islands Fish and Wildlife Office  
300 Ala Moana Boulevard, Room 3-122  
Honolulu, Hawai'i 96850



December 16, 2025

Dawn S. Chang, Chairperson  
Department of Land and Natural Resources  
Division of Forestry and Wildlife  
1151 Punchbowl St #325, Honolulu, HI 96813

Subject: Comments on the Draft Environmental Assessment for the Ka'ū Forest Reserve  
Fenceline Access Project Extension, Hawai'i

Dear Dawn Chang,

The U.S. Fish and Wildlife Service (Service) Pacific Islands Fish and Wildlife Office received your letter dated October 17, 2025, requesting comments on the Draft Environmental Assessment (DEA) for the Ka'ū Forest Reserve Fenceline Access Project Extension. The proposed project will install a road in the Ka'ū Forest Reserve to facilitate access to native species protection projects. The proposed road corridor will be approximately 0.78 miles long and will be located in a remote area of the Ka'ū Forest Reserve, adjacent to Hawai'i Volcanoes National Park in Ka'ū, Hawai'i. The road will be installed with a bulldozer and will be located primarily on a 1950 lava flow. The project is located entirely within the Ka'ū Forest Reserve on the southeastern slope of Mauna Loa, from approximately 5,600 to 5,900 feet elevation. Most of the Ka'ū Forest Reserve is vegetated by a mosaic of different aged stands of 'ōhi'a (*Metrosideros polymorpha*) forest on various substrates. There is little vegetation in the proposed project area because it is sited on a recent lava flow.

The following federally listed species may occur or transit through the vicinity of the proposed project area:

- 'Ōpe'ape'a (Hawaiian hoary bat, *Lasiurus cinereus semotus*)
- Hawaiian forest birds including 'akiapōlā'au (*Hemignathus wilsoni*), 'alawī (Hawai'i creeper, *Loxops mana*), Hawai'i 'ākepa (*Loxops coccineus*), and 'i'iwi (*Drepanis coccinea*)
- Nēnē (Hawaiian goose, *Branta sandvicensis*)
- Hawaiian seabirds, including Hawai'i Distinct Population Segment of the 'akē'akē or band-rumped storm-petrel (*Hydrobates castro*) and 'ua'u or Hawaiian petrel (*Pterodroma sandwichensis*).

### PACIFIC REGION 1

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IDAHO, OREGON\*, WASHINGTON,  
AMERICAN SĀMOA, GUAM, HAWAI'I, NORTHERN MARIANA ISLANDS

\*PARTIAL

No listed plant species have been observed in the proposed project area.

The project will implement the following conservation measures to avoid and minimize impacts to listed species:

- Limit project activities to a lava flow where there is little to no vegetation.
- Avoid cutting, trimming, and destroying large native trees that are greater than 12 inches diameter.
- Conduct reconnaissance for protected plant species before project activities begin and mark “significant” plants (e.g., federally listed plants) with flagging and/or shift the road alignment to avoid impacts.
- Inspect and clean all heavy equipment, tools, boots, and other equipment before entering the project area to prevent establishment of weeds and Rapid ‘Ōhi‘a Death.
- Bulldozing will occur outside of ‘ōpe‘ape‘a pupping season (see note below regarding this measure).

We recommend incorporating our avoidance and minimization measures (Attachment A) for all listed species that may occur in the proposed project area, specifically the avoidance and minimization measures for ‘ōpe‘ape‘a. The DEA erroneously lists April to June as the birthing and pup rearing season. The correct birthing and pup rearing season should be from June 1 to September 15. From June 1 to September 15, woody plants greater than 15 feet tall should not be disturbed, removed, or trimmed.

Additionally, the DEA listed ‘i‘iwi as a Migratory Bird Treaty Act species; however, it is now federally listed as a threatened species (82 FR 43873 43885). Similarly, the ‘io (Hawaiian hawk, *Buteo solitarius*) is no longer federally listed as threatened, though it should be considered a Migratory Bird Treaty Act species (85 FR 164 189).

We support the Ka‘ū Forest Reserve Fenceline Access Project Extension to facilitate the installation of a road corridor, as this project will lead to improved management of an important native ecosystem that provides habitat to many native plants and animals and functions as an important watershed. Short-term impacts potentially resulting from this proposed project will be outweighed by the long-term efforts focused at protecting the area’s biodiversity.

We appreciate your efforts to conserve protected species. If you have questions regarding this response, please contact Colleen Cole, Fish and Wildlife Biologist (phone: 808-460-7697, email: [Colleen\\_Cole@fws.gov](mailto:Colleen_Cole@fws.gov)).

Sincerely,

CHELSIE  
JAVAR-SALAS

Digitally signed by  
CHELSIE JAVAR-SALAS  
Date: 2025.12.16  
15:14:36 -10'00'

Chelsie Javar-Salas

Island Team Manager - Maui Nui and Hawai‘i Island  
Pacific Islands Fish and Wildlife Office

**Attachment A: Avoidance and Minimization Measures**

**ATTACHMENT A: Avoidance and Minimization Measures (AMMs)**  
**Final revised May 2023**

**Endangered ‘ōpe‘ape‘a (Hawaiian hoary bat, *Lasiurus cinereus semotus*):** The Hawaiian hoary bat roosts in woody vegetation across all islands and will leave their young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet or taller are cleared during the pupping season, June 1 through September 15, there is a risk that young bats could inadvertently be harmed or killed, since they are too young to fly or move away from disturbance. Hawaiian hoary bats forage for insects from as low as 3 feet to higher than 500 feet above the ground and can become entangled in barbed wire used for fencing.

To avoid and minimize impacts to the endangered Hawaiian hoary bat we recommend you incorporate the following applicable measures into your project description:

- Do not disturb, remove, or trim woody plants greater than 15 feet tall during the bat birthing and pup rearing season (June 1 through September 15).
- Do not use barbed wire for fencing.

**Endangered ‘ua‘u (Hawaiian petrel, *Pterodroma sandwichensis*), Threatened ‘a‘o, (Newell’s shearwater, *Puffinus newelli*), and Endangered Hawai‘i Distinct Population Segment of the ‘akē‘akē (band-rumped storm-petrel, *Hydrobates castro*):**

Hawaiian seabirds may traverse the project area at night during the breeding, nesting and fledging seasons (March 1 to December 15). Outdoor lighting could result in seabird disorientation, fallout, and injury or mortality. Seabirds are attracted to lights and after circling the lights they may become exhausted and collide with nearby wires, buildings, or other structures or they may land on the ground. Downed seabirds are subject to increased mortality due to collision with automobiles, starvation, and predation by dogs, cats, and other predators. Young birds (fledglings) traversing the project area between September 15 and December 15, in their first flights from their mountain nests to the sea, are particularly vulnerable to light attraction.

To avoid and minimize potential project impacts to seabirds we recommend you incorporate the following measures into your project description:

- Fully shield all outdoor lights so the bulb can only be seen from below.
- Install automatic motion sensor switches and controls on all outdoor lights or turn off lights when human activity is not occurring in the lighted area.
- Avoid nighttime construction during the seabird fledging period, September 15 through December 15.

**Threatened nēnē (Hawaiian goose, *Branta (Nesochen) sandvicensis*):** Nēnē are found on the islands of Hawai‘i, Maui, Moloka‘i, and Kaua‘i. They are observed in a variety of habitats, but prefer open areas, such as pastures, golf courses, wetlands, natural grasslands and shrublands, and lava flows. Threats to the species include introduced mammalian and avian predators, wind facilities, and vehicle strikes.

To avoid and minimize potential project impacts to nēnē we recommend you incorporate the following measures into your project description:

- Do not approach, feed, or disturb nēnē.
- If nēnē are observed loafing or foraging within the project area during the breeding season (September through April), have a biologist familiar with nēnē nesting behavior survey for nests in and around the project area prior to the resumption of any work. Repeat surveys after any subsequent delay of work of 3 or more days (during which the birds may attempt to nest).
- Cease all work immediately and contact the Service for further guidance if a nest is discovered within a radius of 150 feet of proposed project, or a previously undiscovered nest is found within the 150-foot radius after work begins.
- In areas where nēnē are known to be present, post and implement reduced speed limits, and inform project personnel and contractors about the presence of endangered species on-site.

**Endangered Hawaiian forest birds ‘akiapōlā‘au, *Hemignathus wilsonsi*; ‘alawī, Hawai‘i creeper, *Loxops mana*; Hawai‘i ‘ākepa, *Loxops coccineus*; ‘i‘iwi, *Drepanis coccinea*.**

Hawaiian forest birds’ current ranges are predominately restricted to montane forests above 3,500 feet in elevation due to habitat loss and threats at lower elevations. Hawaiian forest bird habitat has been lost due to development, agriculture, grazing, wildfire, and spread of invasive habitat-altering species. Forest birds are also affected by mosquito-borne diseases. Mosquitoes are not native to Hawai‘i; their occurrence increases in areas where ungulate presence results in small pools of standing water. Actions such as road construction and development increase human access and result in increased wildfire and invasive species threats. Grazing results in reductions in woody vegetation and increased grass cover, which reduces forest habitat quality and results in increased wildfire risk on the landscape.

To avoid and minimize potential project impacts to Hawaiian forest birds and their habitat, we recommend you incorporate the following measures into your project description:

- Avoid promoting the spread or survival of invasive species.
- Reduce mosquito populations or stagnant water habitat.
- Reduce wildfire threat to montane forest habitats.
- Avoid removing tree cover during the peak breeding season between January 1 and June 30.

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA

DIVISION OF FORESTRY AND WILDLIFE  
1151 PUNCHBOWL STREET, ROOM 325  
HONOLULU, HAWAII 96813

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HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

January 2, 2026

Chelsie Javar-Salas  
Island Team Manager – Maui Nui and Hawai'i Island  
Pacific Islands Fish and Wildlife Office  
300 Ala Moana Boulevard  
Room 3-122  
Honolulu, HI 96850

Dear Ms. Javar-Salas,

Thank you for your emailed comments regarding the Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR-DOFAW) proposed access corridor project in the Ka'ū Forest Reserve on Hawai'i Island.

DOFAW has corrected the Hawaiian hoary bat pupping season and updated the Appendix A Native Bird Table in the Environmental Assessment (EA), as requested. Additionally, DOFAW will commit to incorporating the USFWS avoidance and minimization measures and has updated the EA's *Mitigation Measures* section to reflect this.

Sincerely,

Emma Yuen  
Native Ecosystems Program Manager  
Division of Forestry and Wildlife

Signature:

Email: david.g.smith@hawaii.gov