

**1999 FEIS HAWAII  
SADDLE ROAD IMPROVEMENT 2 OF 2**

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FHWA-FPHI-EIS-97-1-F

**FINAL  
ENVIRONMENTAL IMPACT STATEMENT  
PART II**

**Saddle Road (State Route 200)  
Mamalahoa Highway (State Route 190) to Milepost 6**

**County of Hawai'i, State of Hawai'i  
FHWA Project No. A-AD-6(1)**

**U.S. Department of Transportation  
Federal Highway Administration  
Central Federal Lands Highway Division**

**State of Hawai'i  
Hawai'i Department of Transportation  
Highways Division**

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Mamalahoa Highway (State Route 190) to Milepost 6  
County of Hawai'i, State of Hawai'i  
FHWA Project No. A-AD-6(1)**

**FINAL ENVIRONMENTAL IMPACT STATEMENT  
PART II**

Submitted Pursuant to Section 42 U.S.C. 4332(2)(c)  
and Chapter 343, Hawai'i Revised Statutes by the

**U.S. DEPARTMENT OF TRANSPORTATION**  
Federal Highway Administration (FHWA)  
Central Federal Lands Highway Division  
and

**STATE OF HAWAII**  
Hawai'i Department of Transportation (HDOT)  
Highways Division

Cooperating Agencies  
U.S. Army Garrison, Hawai'i  
Hawai'i Department of Hawaiian Homelands  
Hawai'i Department of Health

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## ABSTRACT

This Final Environmental Impact Statement (FEIS) presents the Recommended Alternative and the evaluation of impacts associated with the proposed improvement of Saddle Road between the Mamalahoa Highway (State Route 190) and Milepost 6 near Hilo. Twelve action alternatives were under consideration that incorporate use of the existing alignment and potential new alignments. The Recommended Alternative reconstructs the existing substandard two-lane roadway to a two-lane roadway with shoulders for a design speed of 80 to 100 kilometers per hour. Existing Saddle Road is a narrow, winding, two-lane road with steep grades, sharp curves, and poor pavement, with no shoulders. The existing road passes through key training areas of the U.S. Department of the Army's Pohakuloa Training Area (PTA), creating conflict between motorists and military training units. The Recommended Alternative will improve pavement condition, increase safety and capacity, improve quality of traffic flow, decrease cross-island travel times, and stimulate economic growth and development. The Recommended Alternative will realign the road within the PTA to minimize conflicts between military and public uses. Substantive issues have been resolved and included protected species of flora and fauna, Critical Habitat for the Endangered Palila, wetlands and biological habitats of importance, archaeological resources, fire hazard, residential displacement, and noise.

The FEIS consists of three separate documents: Part I, Part II, and Part III. Part I is the FEIS core document, the revised version of the DEIS. It presents the project purpose and need, alternatives considered, affected environment, environmental consequences, mitigation commitments, and an Executive Summary. Part II is the documentation of the public/agency involvement process. It includes the project development history, the project mailing list, correspondence and notices associated with the EIS process, hearing transcripts and associated documentation, and agency and public comments and responses regarding the DEIS. Part III comprises the technical addendum. It includes copies of supplemental studies related to social impacts, 404(b)(1) wetland issues, and Traditional Cultural Properties (TCP). It includes the final archaeological inventory survey report, the Memorandum of Understanding (MOA) related to cultural resources, the Endangered Species Act (ESA) Section 7 Biological Opinion (BO), the Palila Mitigation Memorandum of Understanding (MOU), and supporting correspondence and documentation.

Comments on this FEIS are due on or before the close of business October 5, 1999.

All measurements in this document are in metric.

### Conversion Factors

1 meter = 3.281 feet  
1 kilometer = 0.621 miles  
1 hectare = 2.471 acres  
1 foot = 0.305 meters  
1 mile = 1.609 kilometers  
1 acre = 0.405 hectares

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## LIST OF ABBREVIATIONS

AASHTO	American Association of State Highway and Transportation Officials
ACC/MVM	accidents per million vehicle miles
ADT	average daily traffic
ALF	A'a Lava Flows
ALISH	Agricultural Lands of Importance to the State of Hawai'i
ASTM	American Society of Testing and Materials
BA	Biological Assessment
BCE	before the Common Era
BMP	best management practice
BO	Biological Opinion
BRD	Biological Resources Division
C	Celsius
CAA	Federal Clean Air Act
CAAA	1990 Clean Air Act Amendments
CDP	Hilo Community Development Plan
CDUA	Conservation District Use Application
CE	Common Era
CFR	Code of Federal Regulations
cm	centimeters
CWA	Clean Water Act
CZM	Hawai'i Coastal Zone Management
DAR	Defense Access Road
dB	decibels
dBA	A-weighted decibel scale
DEIS	Draft Environmental Impact Statement
DHHL	State of Hawai'i Department of Hawaiian Home Lands
DLNR	State of Hawai'i Department of Land and Natural Resources
DHHS	State of Hawai'i Department of Health and Human Services
DOA	U.S. Department of the Army
DOD	U.S. Department of Defense
DOFAW	State of Hawai'i Division of Forestry and Wildlife
DOH	State of Hawai'i Department of Health
EIS	Environmental Impact Statement
EMP	Ecosystem Management Plan
EO-PTA	Environmental Office of the PTA
EPA	Environmental Protection Agency
ESA	Endangered Species Act
F	Facultative (Vegetation)
FU	Facultative Upland (Vegetation)
FW	Facultative Wetland (Vegetation)

FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GVP	Gross Value Product
ha	hectares
HAR	Hawai'i Administrative Rules
HCM	Highway Capacity Manual
HDLIR	State of Hawai'i Department of Labor and Industrial Relations
HDOT	State of Hawai'i Department of Transportation
HELCO	Hawaiian Electric Light Company, Inc.
HFBS	Hawai'i Forest Bird Survey
HHCA	Hawaiian Homes Commission Act
HHL	Hawaiian Home Land
HHLP	Hawaiian Home Land Program
HRS	Hawai'i Revised Statutes
IFA	Institute for Astronomy (University of Hawai'i at Hilo)
km	kilometers
kV	kilovolt
L	liters
LEDPA	Least Environmentally Damaging Practicable Alternative
$L_{eq}$	average noise level over a 1-hour period
LOS	Level of Service
LUPAG	Land Use Pattern Allocation Guide
m	meters
$m^3$	cubic meters
mm	millimeters
MOA	Memorandum of Agreement (Section 106)
MOU	Memorandum of Understanding (Palila MOU)
MP	milepost
MPO	Metropolitan Planning Organizations
MTMC	Military Traffic Management Command
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
NPS	National Park Service
NRC	National Research Council
NRCS	U.S. Natural Resource Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory

OBL	Obligate Wetland (Vegetation)
OHA	Office of Hawaiian Affairs
PCB	Polychlorinated Biphenyl
PLF	Pahoehoe Lava Flows
PM <sub>10</sub>	particulate matter smaller than ten microns in diameter
PTA	Pohakula Training Area
R	receptors
RCRA	Resource Conservation Recovery Act
RCRIS	Resource Conservation and Recovery Information System
ref	cross reference
ROD	Record of Decision
ROW	right-of-way
SEE Team	Social, Economic, and Environmental Study Team
SHPD	State Historic Preservation Division
SHPO	State Historic Preservation Officer
SIPs	State Implementation Plans
SLU	State Land Use
SMA	Special Management Area
SR 200	State Route 200 (Saddle Road)
SR 190	State Route 190 (Mamalahoa Highway)
SR 19	State Route 19
SR 11	State Route 11
SRTF	Saddle Road Community Task Force
SWPPP	Stormwater Pollution Prevention Plan
TRB	Transportation Research Board
UPL	Obligate Upland Plants
URARPAPA	Uniform Relocation Assistance and Real Property Acquisition Policies Act
U.S. DOT	U.S. Department of Transportation
USACE	U.S. Army Corps of Engineers
USAG-HI	U.S. Army Garrison, Hawai'i
USARPAC	U.S. Army Pacific Command
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tanks
VA	Volcanic Ash Deposits
vpd	vehicles per day

**SECTION 1 - PROJECT DEVELOPMENT HISTORY**

## 1.1 Saddle Road Project Development History, 1987 to 1998

The following list summarizes the history of the Saddle Road EIS project and provides notable milestones to the coordination and public involvement process. Initially, improvements for Saddle Road had been considered only along the existing alignment within the boundaries of the PTA.

- 7/87 DAR Needs Report completed by U.S. Army Western Command, and Saddle Road needs identified. MTMC requests preparation prepare engineering evaluation.
- 10/87 DAR Needs Evaluation for improvement on existing alignment within the PTA, MilePost 30 to 43, completed by FHWA and submitted to MTMC.
- 12/87 Eligibility for DAR funds determined by MTMC for Saddle Road, MP 30 to MP 43. Improvements to other portions of Saddle Road determined ineligible. \$5.35 million requested by MTMC from DOA for Fiscal year 1990 construction.
- 3/88 HDOT agrees to design and construct proposed improvements, as requested by MTMC.
- 12/88 Estimate for construction costs of PTA segment of Saddle Road completed and submitted to MTMC; estimated cost \$7.5 million.
- 6/89 Saddle Road certified by MTMC as an access road important to national defense within the PTA along the existing alignment, with the understanding that maintenance of the improved road will be the responsibility of the owning agency, HDOT. HDOT indicated that workload will not allow them to design and construct the proposed project and indicated that FHWA should proceed with Project development. A 42-foot wide typical section (two 11-foot travel lanes and a 4-foot paved and 6-foot unpaved shoulder each side) was approved by MTMC.
- 11/89 Project agreement signed by FHWA and HDOT defining agency responsibilities; FHWA to progress environmental compliance, design, and construct; HDOT to obtain Right-of-Way (ROW) and maintain roadway after construction.
- 1/90 Preparation of an Environmental Assessment initiated. Initial SEE Team comprised of participating agencies formed and meeting held in Hilo, HI. Decision made that a safe terminus on west end of project would require extending the project 1.5 miles to west; MTMC concurrence required to proceed with new terminus.
- 5/90 Field work initiated to obtain aerial photography for use in environmental compliance studies; preliminary route location design initiated with completion of mapping.

- 12/90 Line and grade field review held to discuss preliminary alignments and proposed improvements. Public scoping meetings held in Hilo and Waimea. Proposal made by PTA military personnel that the alignment considered for improvement be moved north (mauka) of the PTA training and cantonment areas to reduce civilian/military conflicts; higher command to support recommendation expected.
- 1/91 Concurrence received from MTMC for extension project one mile to the west along existing alignment.
- 2/91 Interagency scoping meeting held in Honolulu to discuss various agency needs and concerns for improvements along existing alignment within the PTA. PTA realignment recommendation presented by U.S. Army representatives. Full EIS anticipated for realignment. Consensus achieved between most agency representatives, with some reservations, that realignment would improve public safety.
- 4/91 Request made by MTMC that development efforts along the existing alignment be stopped and efforts be redirected to develop the realignment proposal.
- 5/91 New estimate and schedule submitted by FHWA for realignment construction between MP 30 and 43. Cost is estimated at \$11.3 M. New surveys, mapping, location studies, and environmental compliance expected to delay initial construction project. Because HDOT was not in agreement with realignment proposal, work stopped by FHWA until agreement between participating agencies could be reached.
- 6/91 Support for realignment proposal forwarded by Senator Daniel Inouye and HDOT.
- 11/91 SEE Team reconvened to advance project development considering realignment proposal. Need determined for full EIS for entire Saddle Road from MP 5 to MP 53 to comply with logical termini requirement.
- 2/92 Estimate prepared by FHWA to complete project development, including environmental compliance from MP 5 to MP 53. Cost is estimated to be \$2.3 Million. Interagency meeting held in Honolulu and public scoping meetings held in Hilo, Waimea, and Captain Cook. FHWA work suspended pending MTMC consideration of additional project development requirements.
- 4/92 HDOT participation in additional project development funding requested by MTMC.
- 2/93 \$2.34 million in DAR funds for project development authorized by MTMC.
- 3/93 Project development activities resumed. Aerial survey and mapping process for realignment studies initiated.

- 5/93 Citizens of the county of Hawai'i invited to form a task force by Senator Inouye to solicit and disseminate information about the project within the community and work with the project development team.
- 6/93 SEE Team reconvened for meeting in Honolulu. First citizens task force meeting held (SRTF).
- 8/93 Mission Statement adopted and goals identified by SRTF.
- 1/94 RUST Environment and Infrastructure selected by FHWA, under an umbrella contract to prosecute environmental compliance and preliminary route location design studies. Okahara & Associates (O & A) selected by RUST for all local project coordination efforts in Hawai'i. Meetings held between FHWA, RUST, O & A, SRTF, and various agencies in Hawai'i to establish communications and develop schedule for project development and scoping process.
- 3/94 Letter of Intent sent to all interested parties, agencies, and organizations and Notice of Intent published in Federal Register.
- 4/94 Notification of Public Scoping Meetings mailed to all interested parties, agencies, and organizations.
- 5/94 Public Scoping Meetings held in Hilo, Kona, and Waimea. Interagency Scoping Meeting held in Hilo. SRTF scoping meeting held in Waimea and SEE Team scoping meeting held in Hilo. Traffic Study completed by RUST. Traffic volumes on Saddle Road determined to be 900 ADT in 1994 and forecasted to be 14,000 ADT, in 2014 with proposed improvements.
- 6/94 Several SRTF Meetings held to generate input on project purpose and need.
- 7/94 Saddle Road Project Information Centers opened in Hilo and Kona to make project information available to interested persons and to receive comments. Notices of information centers published in Hilo and Kona newspapers.
- 8/94 SRTF Meeting held to brief members on project development progress and review proposed alignments developed through scoping process. Field trip to view alternative alignments conducted. Recommended alternatives developed by SRTF to present to SEE Team for further consideration.
- 10/94 SEE Team meeting held in Hilo to brief team on scoping results, review project objectives and purpose, and select alternative alignments for further engineering and environmental study (102 miles of alternatives selected).



- 11/94 SRTF meeting held to review project alternatives advanced for further consideration and project issues and concerns identified. First *Saddle Road Newsletter* published and sent to mailing list (approximately 800 distributed).
- 2/95 Second project development contract initiated with RUST for surveying, mapping, preliminary route location design, and environmental field studies and reports on alternatives developed through scoping process. RUST project team selected, consisting of 12 subconsultants; 10 locally based in Hawai'i.
- 3/95 SRTF Meeting held to brief members on status of project development tasks recently initiated and receive input on progress, issues, and concerns. Meetings held with DLNR to coordinate rights-of-entry for surveying and environmental inventories; review of environmental studies for consistency with Conservation District regulations. Through October of 1995, field work conducted by subconsultants, including biological, botanical, avian, and archaeological surveys and interviews of tourists, road users, truckers, and other citizens conducted.
- 4/95 Interagency meeting to brief agencies on project status and schedule for environmental field inventories and engineering studies (geotech, hydraulics, traffic, etc.). New construction cost estimates prepared; PTA section \$35 million, remainder of Saddle Road \$68 million.
- 8/95 Coordination meeting held with DOA at PTA to discuss issues and concerns relative to alternative alignment studies to date.
- 10/95 Field review of potential alternative alignments and available mapping for west side held with RUST and O & A. Critical Interagency meetings held with DOA and USFWS, DLNR, and NBS to discuss findings of preliminary route location alternatives and potential environmental effects and to receive comments on resulting issues and concerns. Funds made available to begin work on environmental studies portion of RUST contract.
- Environmental Assessment and Notice of Preparation of EIS submitted to Office of Environmental Quality Control.
- 11/95 SRTF, SEE Team and Interagency meetings held to review preliminary alternatives route location and design and receive input. Line and grade field review of first half of staked preliminary alignments held with HDOT, RUST, FHWA, and other interested agencies. Comments incorporated in revisions.
- 12/95 SRTF meeting held to review project progress and future project development procedures and schedule.

- 2/96 Line and grade field review of second half of staked preliminary alignments held with RUST and O & A. Team planning concept initiated for project development. Environmental Project Manager and Local Coordination Manager.
- 3/96 Discussions with U.S. Army Corps of Engineers (USACE) held to perform remaining archaeological inventories and studies within the PTA.
- 4/96 SRTF and SEE Team meetings held. SRTF briefing on project status held at PTA with Senator Inouye and DOA representatives. SEE Team meeting held to review progress status and issues and concerns on various project alternatives. Decision made by SEE Team to eliminate alternatives W-4 and E-1 from further detailed consideration. Several meetings held between FHWA staff and National Biological Service (NBS), USFWS, and USACE to discuss Palila critical habitat (field trip and mitigation discussions), invertebrate inventories, archaeological studies in PTA, and wetlands considerations. Informal consultation with USFWS on critical habitat impact mitigation for Section 7 Consultation.
- 5/96 Preliminary route location design plans completed and exhibits submitted to environmental subconsultants for study reports. Preliminary Design Study Report completed. Sixteen invitations for Cooperating Agency status sent; three acceptances received.
- Meetings held between FHWA staff and U.S. Army Garrison-Hawai'i (USAG-HI), USFWS, Division of Forestry and Wildlife (Hawai'i), HDOT, and National Biological Service (NBS) to discuss coordination of DOA's Ecosystem Management Plan with Palila mitigation effort and general elements of a Palila mitigation plan as proposed by NBS. First draft of a specific mitigation proposal with cost estimates presented by NBS.
- 6/96 Workshop given by FHWA, Hawai'i Division, to subconsultant team on EIS Preparation. New construction cost estimates submitted based on preliminary design received from consultants: PTA, \$34 million to \$40 million; remainder of Saddle Road, \$92 million to \$106 million. Cost dependent on alternative selected.
- 7/96 Modification made to RUST contract to provide for biological survey and report on invertebrate species as required by USFWS, research to assess social effects of alternatives relative to Native Hawaiian culture, and extend the authority of existing subconsultant to provide archaeological and historical properties investigations within PTA in lieu of USACE. State participation in funding of Saddle Road project development effort committed by HDOT.

- 8/96 Meetings held between FHWA staff and USAG-HI regarding coordination of their Ecosystem Management Plan efforts with Saddle Road mitigation proposals. Discussions held with new subconsultant to develop Public Information Program (newsletters followed). Additional cultural properties field inventories begin within PTA.
- 9/96 Meeting held with subconsultant to initiate compilation of Biological Assessment as required for Section 7 consultation of Endangered Species Act.
- 10/96 SRTF, Interagency, and SEE Team project development meetings held in Hilo to review project alternatives and associated affected environments, impacts, and proposed mitigation, and solicit input relative to issues, and concerns. Proposed project schedule and interagency coordination discussed. Selection of possible preferred alternatives discussed by SEE Team. Alternatives EX-4 and EX-1 eliminated.
- 11/96 Interagency meeting held in Honolulu, hosted by Senator Inouye, to discuss specific project mitigation elements, processes, and coordination required including critical habitat replacement land transfers, management strategies, funding, and necessary agreements. Elements and procedure for Biological Assessment to be required by USFWS for this project confirmed. Fire prevention roadway cross-section confirmed. Discussions held on coordination of DOA's Ecosystem Management Plan with Palila Mitigation Plan. Discussions held with HDOT on project development issues impacting scope of possible initial construction project. Field trip conducted with FHWA, USFWS, and USACE to review wetland findings and discuss procedures for jurisdictional delineation and permitting requirements. Issue #2 of *Saddle Road Newsletter* distributed to approximately 1,170 groups and individuals.
- 12/96 SRTF meeting held to present results of discussions and interagency coordination to date and receive community-related input from members on all project issues and concerns as well as public information program progress and plans. FHWA solicitation opened for new contract for Hawai'i-based firm; first task order to include continued work on environmental studies and preliminary design.
- 1/97 Issue #3 of *Saddle Road Newsletter* mailed to approximately 1,170 groups and individuals.
- 3/97 Preliminary Draft EIS (PDEIS) distributed to all participating, cooperating, and coordinating agencies for review and comment. PDEIS distributed to internal staff for review. Biological Assessment submitted with request for early coordination under Section 7 to USFWS. Need determined for additional funding to complete further environmental compliance studies. Technical report on archaeological and historical properties received at FHWA.

- 4/97 Two Interagency meetings held to discuss issues, impacts, and mitigation proposed as presented in the PDEIS. Most agency written comments received by end of month as requested. Confirmation from USFWS received that all details of multi-agency management of Palila mitigation lands would need to be resolved before submittal of BA. Letter sent transmitting cultural properties report to SHPO and requesting concurrence with eligibility determinations. O & A selected for work in Hawai'i under Indefinite Delivery/Indefinite Quantity Contract. O & A's first task order provides for continuance of environmental and design work on project.
- 5/97 Procedures and methodology for DOA 404 permitting and jurisdictional determinations requested from USACE. Verification of Nene Sanctuary status requested from DLNR.
- 6/97 Draft summary of Palila mitigation lands multi-agency management strategies tentatively agreed upon by coordinating agencies in a series of meetings in May and June sent to agencies for comment. Meeting of various individuals and hunting organizations held to identify issues related to potential impacts on hunting resources and activities.
- 7/97 Task order executed with O & A to proceed with additional environmental compliance work and location and design refinements for environmental mitigation under ID/IQ contract. Response from USACE on 404 permitting and delineation requirements received. Meetings held with various hunting organizations and individuals to identify issues related to potential impacts on hunting resources and activities.
- 8/97 Meeting of FHWA, O & A, and subconsultants held to determine new schedule and required coordination for remaining work through publication of DEIS, public hearings, and close of public comment period. Response letter received from SHPO regarding eligibility concurrence. Jurisdictional determination requested and received from USACE.
- 10/97 DEIS published and distributed to mailing list. BA submitted to USFWS with request for initiation of Section 7 Formal Consultation.
- 11/97 Notice of Availability of DEIS published in Federal Register and Hawai'i Office of Environmental Quality Control Bulletin. Public Hearing notices published and letter advising of availability of DEIS and Public Hearing locations and dates sent to project mailing list. Notice received from SHPO stating that further ethnographic studies would be required to determine eligibility of mamane forest and Mauna Kea as Traditional Cultural Properties.
- 12/97 Two Public Hearings held: one held on weekday on west side of Island of Hawai'i and one held on Saturday on east side of Island of Hawai'i. Public comment period ended. USFWS letter received stating that BA was adequate and a Final BO would be delivered by March 27, 1998.

- 1/98 DEIS comments received through this month. EPA comment letter received and discussions with EPA, USACE, State of Hawai'i DLNR and SHPD began to resolve outstanding issues.
- 2/98 To allow more time to resolve endangered plant issues, FHWA and USFWS mutually agree to extend the date for the Final BO to April 17 and that it would be submitted in draft form until Palila mitigation implementation details could be confirmed. DEIS comments received from DOI; began resolution of outstanding issues with USFWS.
- 3/98 SEE Team reviews all information and agency coordination received to date and comparative analysis of alternatives and recommends selection of W-3, PTA-1, EX-3, and E-3 as Recommended Alternative. Work begins on 404(b)(1) analysis to address issues raised by the EPA and USACE with regard to alternative alignments in wetland area and proposed mitigation.
- 4/98 USFWS issues Final BO in which it is concluded that "the mitigation measures built into the project...will offset the modifications being made to palila critical habitat and enhance the likelihood of survival and recovery of the palila." Revised archaeological inventory and historic assessment report submitted to SHPO requesting concurrence with eligibility determinations, effects, and proposed mitigation.
- 5/98 404(b)(1) Analysis Report submitted to the HDOT, USACE, EPA, USFWS with request for concurrence on the selected alternative and mitigation measures proposed.
- 6/98 Letters of concurrence from USFWS, HDOT, and USACE on 404(b)(1) Report received. EPA indicates verbally that they do not agree with suppositions, analyses, alternative selection, and mitigation as proposed in 404(b)(1) Report and that a memorandum outlining the basis for disagreement will follow.
- 8/98 Letter from EPA received in disagreement with selection of Least Environmentally Damaging Practicable Alternative in Section IV as well as mitigation proposed.
- 9/98 Reply to EPA August letter sent, meeting with EPA to resolve issues of disagreement, additional costs of non-selected alternative and mitigation requirements agreed upon.
- 10/98 Letter sent to EPA outlining modifications to LEDPA costs and mitigation and identifying the basis for agreement. Agreement reached with SHPD on eligible sites, effects, and mitigation proposed; MOA finalized with SHPD and consultation begins with OHA on MOA.
- 11/98 Preliminary FEIS distributed to all agencies for final review and comment.

- 12/98 Letter received from EPA documenting agreed upon LEDPA alternatives, wetlands mitigation, and 404 Permit process to be followed for programmed projects. Revised Draft MOA transmitted to OHA and signatory parties.
- 1/99 Meetings held with agencies to discuss preliminary FEIS, resolve any remaining concerns. Initiate consultation with DHHL on Section 106 MOA. All signatory parties to MOA reach agreement; concurring party OHA indicates disagreement on wording in MOA with respect to their role and sites.
- 2/99 Meeting held with DLNR to brief new director and reinforce coordination efforts required in Palila mitigation and MOA finalization. Problems develop with BRD budgeting of partial Palila mitigation.
- 3/99 Clarification of significance criteria for archaeological sites received from SHPO. Staff meeting with OHA to discuss further concerns on MOA.
- 4/99 Meeting with OHA Land Committee to request recommendations of approval of MOA to Trustees; OHA Trustees approve MOA. All issues resolved and FEIS revised for publication. "Reasonable assurance" of Palila mitigation funding secured from DOD.
- 7/99 Meetings with DLNR and ranchers to review Uniform Relocation Assistance and Real Property Acquisition Policy Act and initiate transferral of Palila mitigation lands. Final SRTF meeting held.
- 8/99 FEIS published and Conservation District Use Application (CDUA) submitted. Final project newsletter distributed to mailing list.

Note: Numerous one-on-one meetings have been held between January, 1994 and the present with interested individuals, agency representatives, and public and private organizations, to provide project briefings and/or receive input on project issues and concerns. Specific meeting dates and subject matter are too voluminous to list. A list of organizations for which one or more formal project briefings were presented at various stages in project development is presented in Table 1.1, *Community Meetings*.

**TABLE 1.1**  
**Community Meetings**

Kaumana Community Association	Hawai'i Island Chamber of Commerce
Upper Kaumana Community Council	Big Island Business Council

**TABLE 1.1**  
**Community Meetings**

Kaumana City Association	Kona Senior Citizens
Waiki'i Ranch Community Association	Waimea Community Association
Waimea Rotary Club	AARP-Hilo Chapter
South Hilo Rotary Club	Waimea Exchange Club
Hawai'i County Council	Big Island Retired Military Association
Waimea Lions Club	Hilo Woman's Club
Sierra Club	Various Hunting Groups

Open meetings were held in Hilo, Kona and Waimea from April to October, 1995, to present project briefings and distribute social impact survey questionnaires.

**1.2 List of Agencies, Organizations, and Persons Consulted in the Preparation of this Document**

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Mr. Paul Conry, Non-game Biologist  
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Mr. Harry Kim, Administrator  
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#### 1.2.1 Saddle Road Task Force

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Parker Ranch  
Kamuela, HI

Dwayne Mukai  
Hawai'i County  
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Bob Bethea  
Bethea, Black, Konishi & Nishimura  
Hilo, HI

George Martin  
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Maibida Fontes 73 Maia Street Hilo, HI 96720	Elizabeth Frendo 15 Kepaa Street Hilo, HI 96720	Ben & Fusue Fujisue 1058 Kamana Drive Hilo, HI 96720	Mildred Winans 858 Edena Street Hilo, HI 96720	Bill Cook P. O. Box 6960 Kamuela, HI 96743	Bill Cooper P. O. Box 1560 Kapaa, HI 96755
Hazel Gaines 2494 Alaola Drive Hilo, HI 96720	Rosalene Gajolon 384-E Laniakula Street Hilo, HI 96720	Alfred F. Goncalves 2411 Kilauea Ave. Hilo, HI 96720	Eilatru Ely Possah P. O. Box 1735 Honokaa, HI 96727	Charles Peilerson P. O. Box 392 Panulo, HI 96778	Slovo Bowles P.O. Box 326 Kamuela, HI 96743
Isami Hashimoto 70 Hoku Street Hilo, HI 96720	Elizabeth Iauanko 55 Hanoahano Street Hilo, HI 96720	Ruth Ho'okano HCT 2 13019 Keaau, HI 96749	Joy Jermolli P. O. Box 1593 Kamuela, HI 96743	Jane Fishback P. O. Box 538 Kamuela, HI 96743	Chuck Chaiko P. O. Box 2245 Kamuela, HI 96743
Yoneko Imamura 542 Laukapu Street Hilo, HI 96720	Edward L.H Kanahelo 110 Auwao Road Hilo, HI 96720	Rose Kim 1610 Kinohale Street Hilo, HI 96720	Tsukitsh Inoue 1994 Kilauea Avenue Hilo, HI 96720	Capt. John Vares Waimea Pkoco P. O. Box 939 Kamuela, HI 96743	Shirley Wilson P. O. Box 1208 Kamuela, HI 96743
Margaret Lau 1009 Iolani Street Hilo, HI 96720	Billy Lou Leslie 145 Kamana G-6 Hilo, HI 96720	Jesse & Annetta Malandra 15-173 Puni Lopa N. Pahoa, HI 96778	Allan Wooddell P. O. Box 1119 Kamuela, HI 96743	Deo Dickson P. O. Box 2396 Kamuela, HI 96743	Fred Chalfee WM Keck Observatory 65-1120 Mamalahoa Hwy Kamuela, HI 96743
Robin Kow 324 Kamaunoho Place Hilo, HI 96720	Alice Maulins 1049 Milliani Street Hilo, HI 96720	Hazel Masacka Po Box 1695 Keaau, HI 96729	Mindy Dant Fuh Werd, Inc. 78-7130 Kalelopopa Street Kailua-Kona, HI 96740	Gary Cadwalader Waiahi Ranch Community P. O. Box 906 Kamuela, HI 96743	Margo Takola KonaKou Shopping Center 78-6831 Alii Dr., Suite 234 Kailua-Kona, HI 96740
Sadie Manus 2230 Alaola Drive Hilo, HI 96720	Charles Jamieson 446A Alinalako Road Hilo, HI 96720	Rosa Masutani 1781 Kaiako Street Hilo, HI 96720	Kaneloa Al Kona 70-261 Manukai Street Kailua-Kona, HI 96740	Nathan Lam Kona Surf Resort 70-128 Ehuakai Street Kailua-Kona, HI 96740	John P. Thomas 865 Palani St. Hilo, HI 96720
Bevmyra Medeiros 2626 Kilauea Ave. Hilo, HI 96720	Harvey Chan 932 Komanala Drive Hilo, HI 96720	Helen Namohala 145 F-5 Kamana Street Hilo, HI 96720	Ann Petersen PATII P. O. Box 62 Kailua-Kona, HI 96745	Scott E Miller Bishop Museum 1525 Bernice St Honolulu, HI 96917-0916	Steve Ilert Big Island Bird Hunters Assoc. 17-124 Palani St Keaau, HI 96749
Masako Mishokawa 20 Terraco Circle Hilo, HI 96720	Constance Riddle 24 Pukihao Street Hilo, HI 96720	Daisy Smith 15-2668 Mano Street Pahoa, HI 96778	Thomas Edick FLH Program Administrator 400 7th St., SW Rm 4136 Washington D.C., 20590	Maik Gushken P. O. Box 1027 Hilo, HI 96721	Kazu Hayashida Hi. Dept. Of Transportation 869 Punchbowl Street Honolulu, HI 96813-5097





<p>Lt. Col. Wally Z. Walters U.S. Army Corps. Of Engineers Building 230, Room 203 Fort Shafter, HI 96858-5440</p>	<p>Kathleen A. Dadey U.S. Army Corps Of Engineers Building 230 Fort Shafter, HI 96858-5440</p>	<p>Robert P. Smith U.S. Fish &amp; Wildlife Service Po Box 50088 Honolulu, HI 96850</p>	<p>Shirley Mattingly FEMA Region 9, Bldg 105 P. O. Box 29990 Presidio Of San Francisco, CA 94122</p>	<p>Sam Callejo Dept. Of Accounting 1151 Punchbowl St Honolulu, HI 96813</p>	<p>Honolulu Advertiser City Desk P.O. Box 3110 Honolulu, HI 96802</p>
<p>Hawaii Office Of EQC 235 S Beretania Street Suite 702 Honolulu, HI 96813</p>	<p>Administrator State Office Of Hawm. Affairs 711 Kapiolani Blvd., Suite 500 Honolulu, HI 96813</p>	<p>Dennis R. Lau State Dept. Of Health 919 Ala Moana Blvd., Rm 301 Honolulu, HI 96814</p>	<p>Susan M. Chandler Dept. Of Human Services P. O. Box 339 Honolulu, HI 96809</p>	<p>Yukio Kitagawa Dept. Of Agriculture 1428 South King St Honolulu, HI 96813</p>	<p>State Of Hawaii Department Of Health 1250 Punchbowl St Honolulu, HI 96813</p>
<p>Ray Soon Hawaiian Homes Commission P.O. Box 1879 Honolulu, HI 96805</p>	<p>Aaron Ueno State Of HI Dept. Of Health 1502 Kalanianohe Ave. Hilo, HI 96720</p>	<p>Dr. William Steiner USGS Biological Research Po Box 44 HVPN, HI 96718</p>	<p>Housing &amp; Urban Devel. Regional Enviro. Officer P. O. Box 36003 San Francisco, CA 94102-3448</p>	<p>Office Of Hawaiian Affairs Chairperson 711 Kapiolani Blvd., Suite 500 Honolulu, HI 96813</p>	<p>Hannah Springer Office Of Hawaiian Affairs 711 Kapiolani Blvd., Suite 500 Honolulu, HI 96813</p>
<p>Col. James T. Herai HQ, U.S. Army Garrison, HI Building 580, Rm. 100 Schofield Barracks, HI 96857-5000</p>	<p>LTC Dennis R. Owen HQ, PTA, USAG-HI Bldg. T-180, Milepost 36, 11200 Hilo, HI 96720</p>	<p>Director DPTMSEC, US Army Garrison ATTN: APVG-GT Schofield Barracks, HI 96857-5000</p>	<p>Rose Y. Tseng University Of Hawaii Hilo 200 West Kauwili St. Hilo, HI 96720</p>	<p>Dept. Of Housing &amp; Devel. 650 S. King St. Honolulu, HI 96813</p>	<p>Fire Chief, Hawaii County 25 Aupuni St Hilo, HI 96720</p>
<p>Director DPTW, US Army Garrison HI Building 300 Schofield Barracks, HI 96857-5000</p>	<p>Timothy E. Johns DLNR P. O. Box 621 Honolulu, HI 96808</p>	<p>Dean Uchida DLNR-Land Management 1151 Punchbowl St. Honolulu, HI 96813</p>	<p>Hawaii State Archives Iolani Palace Grounds Honolulu, HI 96813</p>	<p>County Of Hawaii Dept. Of Parks &amp; Recreation 25 Aupuni Street Hilo, HI 96720</p>	<p>Department Of Water Supply County Of Hawaii 25 Aupuni St Hilo, HI 96720</p>
<p>Faison Nagata DLNR-State Parks 1151 Punchbowl St Honolulu, HI 96813</p>	<p>Julio A. Cirillo FHIA-Regional Admin. 201 Mission St., Suite 2100 San Francisco, CA 94105</p>	<p>Eugene W. Ciockley FHIA-Enviro. Oper. Division 400 Th St., SW, Rm 3301 Washington, D.C. 20530</p>	<p>County Council County Of Hawaii 25 Aupuni Street Hilo, HI 96720</p>	<p>Hawaii Bicycle League 3442 Waialae Ave., Suite 1 Honolulu, HI 96810</p>	<p>Historic Hawaii Foundation P. O. Box 1058 Honolulu, HI 96806</p>
<p>Office Of Federal Activities Environmental Protection Agency 401 M St., S.W., Rm 2119 Washington, D.C. 20460</p>	<p>David Fattel EPA-Federal Activities 75 Hawthorne St. San Francisco, CA 94105-3901</p>	<p>Willie Taylor Dept. Of Interior-EP&amp;C 1049 C St., NW, Rm. 2024 Washington, D.C. 20240</p>	<p>Moses Kaohi 349 Kapiolani Street Hilo, HI 96720</p>	<p>Clarence Suzuki 25 E Puunako Street Hilo, HI 96720</p>	<p>U.S. Department Of Commerce Office Of Ecology &amp; Conser. 14th St. &amp; Constitution Ave NW Washington, D.C. 20230</p>
<p>Claudia Messidy Council Of Historic Preservation 12138 West Bayaud, Suite 330 Lakewood, CO 80228</p>	<p>Office Of The Secretary U.S. Dept. Of Agriculture 14th St. &amp; Independence Ave., SW Washington, D.C. 20250</p>	<p>Carol Boygstrom Div. Of NEPA-Forrestal Bldg 1000 Independence Ave., SW Washington, D.C. 20585</p>	<p>Gordon Matsuoka State Public Works Engineer P. O. Box 119 Honolulu, HI 96810</p>	<p>Department Of Commerce State Of Hawaii-Kamamalu Bldg 1010 Richards Street Honolulu, HI 96813</p>	<p>Hawaii Visitors Bureau 2270 Kalakaua Ave., #801 Honolulu, HI 96815</p>
<p>Yvicki H. Tsubako EPA-Pac. Islands Office 300 Ala Moana Blvd., Rm 1302 Honolulu, HI 96850</p>	<p>Naihanuel Conner National Conservation Ser. P. O. Box 50004 Honolulu, HI 96850</p>	<p>William Meyer Geological Survey 677 Ala Moana Blvd., #415 Honolulu, HI 96813</p>	<p>Thelma Parker Memorial 67-1209 Māmālahoā Highway Kamuela, HI 96743-8429</p>	<p>Hauunani Apoliona Alu Like, Inc. 1024 Māpunapuna St. Honolulu, HI 96819</p>	<p>Carol Van Camp 202 Kamehameha Avenue Hilo, HI 96720</p>
<p>Bryan Henry U.S. Dept. Of Interior 300 Ala Moana Blvd. Honolulu, HI 96813</p>	<p>Dave Carlson EPA-Region IX 75 Hawthorne St, Code CMD-2 San Francisco, CA 94105</p>	<p>Kohala Community Assoc P. O. Box 808 Kapaa, HI 96755</p>	<p>Native Hawaiian Advisory Council 417 Ulukou Street #11 Kaunua, HI 96734</p>	<p>Thelma Parker Memorial 67-1209 Māmālahoā Highway Kamuela, HI 96743-8429</p>	<p>Carol Van Camp 202 Kamehameha Avenue Hilo, HI 96720</p>

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Kaimuki Regional Library 1041 Koko Head Ave Honolulu, HI 96816	Pearl City Regional Library 1138 Waimano Home Rd Pearl City, HI 96782	Kailua-Kona Library 75-140 Hualalai Rd Kailua-Kona, HI 96740	David Muraski P. O. Box 4773 Hilo, HI 96720	Keith Burchett 430 W. Kawai Street Apt. 25C Hilo, HI 96720
Kaneohe Regional Library 45-029 Kamehameha Hwy. Kaneohe, HI 96744	Jeno Encencio 730 Kaiwika Road Hilo, HI 96720	University Of Hawaii Hilo Campus Library PO Box 1357 Hilo, HI 96721	Michael Taisee P. O. Box 1175 Keaau, HI 96749	Michael Leo 880 Milliani Street #502 Honolulu, HI 96813
Hilo Public Library PO Box 647 Hilo, HI 96721	Hawaii State Library 478 South King Street Honolulu, HI 96813	Kahului Regional Library 90 School Street Kahului, HI 96732	Barry Mizuno 434 Olu Street Hilo, HI 96720	Michael Lum 1554 Waiannenua Avenue Hilo, HI 96720
Caron Song 755 B Kaunahu Drive Hilo, HI 96720	Glenn Okuda P. O. Box 273 Papaikou, HI 96781	Roy Palmer P. O. Box 1157 Mt. View, HI 96771	Les Fukuhara 25-228 Ua Nahaole Street Hilo, HI 96720	Earl Iketha 2025 Puhiwa Drive Hilo, HI 96720
Henry Foxburgh HCR 2 Box 8203 Keaau, HI 96749	Scott Honerston 1455 Waiannenua Avenue Hilo, HI 96720	Dennis Shigooka 688 Kinohole Street #207 Hilo, HI 96720	Andrew A. Aki P. O. Box 2084 Kailua-Kona, HI 96743	Larry K. Hookahi, Sr. P. O. Box 1067 Kamuela, HI 96743
Marl Smith P. O. Box 936 Hilo, HI 96720	Mark Chamberlain HCR-1 Box 5775 Keaau, HI 96749	Iral Kaniigaki P. O. Box 1027 Hilo, HI 96721-1027	Phil Bruco P. O. Box 303527 Waikoloa, HI 96738	John E. Dore P. O. Box 6394 Kamuela, HI 96743
Ramlo Libas 84-359 Kapuahi Street Miliani, HI 96789	James Head 12 Akamal Loop Hilo, HI 96720	Bruce Shihoji 1228 Horua Street Hilo, HI 96720	Wayne Botaiho P. O. Box 33 Paauilo, HI 96776	Shannon Kogasaki P. O. Box 1088 Kealahou, HI 96750



Danny Lopes P. O. Box 6438 Kamuela, HI 96743	Robert Stevens 121 Puskio Beach Drive Kamuela, HI 96743	Anno E. Field-Gomes P. O. Box 6368 Kamuela, HI 96743	Carl Carlson, Jr. Parker Ranch P. O. Box 458 Kamuela, HI 96743	Dr. Bruce Chrisman P. O. Box 1723 Hanalei, HI 96727
Wayne Botelho P. O. Box 505 Kapaa, HI 96755	Dino Chiappolla P. O. Box 1306 Kamuela, HI 96743	James Thomas P. O. Box 1821 Kamuela, HI 96743	John DeConio P. O. Box 184 Laupahoehoe, HI 96764	Karen Hayashida 47-745 Akakoa Pl. Kaneohe, HI 96744
Tyson Nakashima 77-6555 Seaview Circle Kailua-Kona, HI 96740	Elmo Lincoln P. O. Box 6082 Kamuela, HI 96743	Ann Peterson P. O. Box 62 Kailua-Kona, HI 96745	David Higgins P. O. Box 6805 Kamuela, HI 96743	Robert & Erin Hill 564 Kaumana Drive Hilo, HI 96720
David Yamakawa 76-427 Wana Street Kailua-Kona, HI 96740	Alan Nakagawa P. O. Box 1825 Kailua-Kona, HI 96743	Renne Chapman 68-3605 Pakanu Place Waikoloa, HI 96738	Karl Kawahara 36 Melani Street Hilo, HI 96720	Pat King P. O. Box 2213 Kamuela, HI 96743
Mike Prohoroff Box 450 Hawi, HI 96718	Walea Wamassa P. O. Box 434 Kamuela, HI 96743	Albert H. Kawabata P. O. Box 38 Kamuela, HI 96743	Kathrin Kohler P. O. Box 358 Kamuela, HI 96743	Larry Koval 94-343 Kealakea St. Mililani, HI 96789
Kathy McMullen 75-5768 Makefina Place Kailua-Kona, HI 96740	Reba-Mae Silva P. O. Box 372 Kailua-Kona, HI 96745	Dolly Moffa Box 6605 Hilo, HI 96720	Jason Moniz K.K. Ranch Ltd. P. O. Box 428 Paauilo, HI 96779	Phillip Mosher P. O. Box 1874 Kailua-Kona, HI 96745
David L. Bigelow P. O. Box 415 Kamuela, HI 96743	Jim Dupont P. O. Box 125 Kamuela, HI 96743	Barnes McGrath Box 6396 Kamuela, HI 96743	Kenneth Ono K-K Chamber Of Commerce 75-5737 Kuakini Hwy, Suite 207 Kailua-Kona, HI 96740	Stafford Oyama 311 Ioni Place Hilo, HI 96720
Santiago Cordero 640 Hinano Street Hilo, HI 96720	David Kamalani P. O. Box 1645 Kamuela, HI 96743	Gilbert K. Kuaif, Sr. P. O. Box 512 Pepeekeo, HI 96783	Walter Patton 27-703 Kaleia Road Papaikou, HI 96781	Melba Oshicho 334 Ka Manalo Place Hilo, HI 96720
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Caroline L. Nakashima 77-6555 Seaview Circle Kailua-Kona, HI 96740	Jerry K. Kaawaba 15-2787 Aka Street Pahoa, HI 96778	John W. Kamoku, Sr. 127 Ohuohu Hilo, HI 96720	Byron Sako 1987 Ukaoka Road Hilo, HI 96720	Robert Saunders W.H. Shipman, Ltd. PO Box 950 Keauau, HI 96749

<p>Harry Schat Blue Mountain House P. O. Box 383388 Waikoloa, HI 96738</p>	<p>Mary Steiner The Outdoor Circle 13314 South King St., Suite 308 Honolulu, HI 96814</p>	<p>Ray Stellingwerf Waikoloa Village Assoc. 68-1792 Meleia Street Waikoloa, HI 96738</p>
<p>Dr. Fred Stone Hawaii Community College 200 W. Kawili St. Hilo, HI 96720</p>	<p>Elizabeth Stone General Delivery Naalehu, HI 96772</p>	<p>Glen Suzuki 3531 Kaimuki Ave. Honolulu, HI 96816</p>
<p>Ronald Takamoto 18 Alohakani Drive Hilo, HI 96720</p>	<p>Bern Teukazaki Menozes Tsukazaki Yeh &amp; Moore 100 Pauahi St., Suite 204 Hilo, HI 96720</p>	<p>Nancy Wassman P. O. Box 155 Laupahoehoe, HI 96764</p>
<p>Roger West 73-1323 Awakea Street Kaiua-Kona, HI 96740</p>	<p>Murjole Ziegler Sierra Club Legal Defense Fund, Ltd. 223 S. King St., 4th Floor Honolulu, HI 96813</p>	<p>Marie Aguilar P. O. Box 1874 Kailua-Kona, HI 96745</p>
<p>Alvin Char Environmental Dept. U.S. Army Garrison Schofield Barr. Waikawa, HI 96786</p>	<p>Merrill Deskins FHWA-Region 9 201 Mission St., Suite 2100 San Francisco, CA 94105</p>	<p>Susan Fruchter U O H-Environmental Center 2550 Campus Rd., Crawford 317 Honolulu, HI 96822</p>
<p>Gary Cui Office Of Environmental Qual. Control 236 S. Beretania St., Suite 702 Honolulu, HI 96813</p>	<p>John Harrison U O H - Environmental Ctr 2550 Campus Rd., Crawford 317 Honolulu, HI 96822</p>	<p>Jon Ishikawa 1036 Green St., Apt. 308 Honolulu, HI 96822</p>
<p>Lloyd Lau P. O. Box 150 Kamuela, HI 96743</p>	<p>Randall Ogata Office Of Hawaiian Affairs 711 Kapiolani Blvd., #500 Honolulu, HI 96813</p>	<p>Barry Tollen Dept. Of Public Works U.S. Army Garrison-Schofield Barr. Waikawa, HI 96786</p>
<p>Eihei Wakano 200 Anela St. Hilo, HI 9680720</p>		

#### 1.4 Chronological Correspondence and Notices

The correspondence included in this section is organized into five sections: 1994, 1995, 1996, 1997, and 1998.

##### 1.4.1 Chronological Correspondence and Notices, 1994

Correspondence from:	Correspondence To:	Date
FHWA	Interested agencies, organizations, and citizens	4-19-94
RUST	Distribution list	4-19-94
FHWA	Interested agencies, organizations, and citizens	4-21-94
IFA (Univ. of Hawaii at Manoa)	FHWA	4-14-94
State of Hawaii - Department of Education	FHWA	4-20-94
State of Hawaii - Department of Business, Economic Development, & Tourism	FHWA	4-21-94
State of Hawaii - Department of Business, Economic Development, & Tourism		4-20-94
DLNR	FHWA	5-3-94
United States Department of the Interior	FHWA	5-5-94
DHHL	Okahara & Associates, Inc.	5-6-94
State of Hawaii - Office of Environmental Quality Control	FHWA	5-9-94



U.S. Department of Transportation  
Federal Highway Administration

Central Federal Lands Highway Division

555 Zang Street  
P.O. Box 25246  
Denver Colorado 80225 0246

April 19, 1994

**RUST ENVIRONMENT & INFRASTRUCTURE**

RUST Environmental & Infrastructure Inc.  
3441 North 14th Street, Suite 400  
Phoenix, AZ 85016  
Tel: (602) 275-1311 • FAX (602) 275-1314

April 19, 1994

**INTERESTED AGENCIES, ORGANIZATIONS, AND CITIZENS:**

The Federal Highway Administration, Central Federal Lands Highway Division, and the US Army, along with the Hawaii Department of Transportation and the County of Hawaii will hold three public scoping meetings for the proposed improvements of Hawaii State Route 200, Saddle Road.

The three public scoping meetings will be held in Hilo, Kailua-Kona, and Waimea on the island of Hawaii. The first meeting will be held on Tuesday, May 10, 1994 in Hilo. Open house will begin at 6 p.m. followed by the meeting at 7 p.m. in the Hawaii Council Room located at 25 Auupuni Street. The second meeting will be held on Wednesday, May 11, 1994 in Kailua-Kona. Open house will begin at 6 p.m. followed by the meeting at 7 p.m. at the Kona Beach Hotel, 75-5660 Palani Road. The third meeting will be held on Thursday, May 12, 1994 in Waimea. Open house will begin at 6 p.m. followed by the meeting at 7 p.m. in the Kahilu Town Hall located in the Parker Ranch Shopping Center.

The purpose of public scoping meetings is to help identify issues and concerns of the public. These meetings are an opportunity for the public to voice their opinions, concerns, comments, and ideas regarding the proposed improvements.

If you have questions or comments, but will be unable to attend one of the three public scoping meetings, you may send them to the address below or you may contact the Federal Highway Administration directly by calling Mr. Bill Bird at (303) 969-5909 or FAX (303) 969-6499.

FEDERAL HIGHWAY ADMINISTRATION  
% Okahara & Associates, Attn: Mr. Bill Moore  
200 Kohola Street, Hilo, HI 96720

177157041904 184

Keith Abue, Chairperson  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809

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OKAHARA & ASSOC., INC.  
HILO OFFICE

Dear Mr. Abue:

The Federal Highway Administration has resumed its project development efforts on Hawaii Defense Access Road A-AD-6(1), Saddle Road. To expedite the project development process, FHWA has elected to utilize one of the architect & engineering firms it presently has under contract. RUST Environment & Infrastructure has been selected for this purpose. RUST's subconsultant on the island of Hawaii is Okahara & Associates with offices in Hilo and Kailua-Kona. Okahara & Associates is an established and well qualified Big Island firm and brings to the project development team considerable local knowledge and expertise on environmental, engineering, political and social issues and concerns.

Since the last interagency scoping meeting, held on February 11, 1992, the Military Traffic Management Command (MTMC) in Washington, D.C., has endorsed the recommendation of the US Army Support Command, Hawaii (USASCH) to relocate Saddle Road along the northern boundary of the Pohakuloa Training Area (PTA). The proposed new alignment would move the road to the north of the PTA administration area and the Bradshaw airfield, thus serving both the PTA and the public to a far better degree by routing traffic out of the primary military maneuver area.

The proposed realignment adds considerable complexity to the design and construction efforts for the project. It has also been determined that a full Environmental Impact Statement (EIS) will have to be prepared, covering almost the entire length of Saddle Road, to comply with the National Environmental Policy Act and the Council of Environmental Quality regulations. As a result, the scope of the project has increased significantly. Additional Defense Access Road (DAR) funds have now been programmed to prepare the EIS for the entire route and develop the construction plans for the work within the PTA.

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Quality through involvement

Saddle Road Project  
April 19, 1994  
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The same letter sent to the following agencies:

Pat McCoy  
Hawaii Archaeological Section  
State Historic Preservation Division  
P.O. Box 621  
Honolulu, Hawaii 96809

Glenn Taguchi, District Land Agent  
DLNR Division of Land Management  
Hawaii Land Management District Office  
State Office Building  
75 Aupuni Street  
Hilo, Hawaii 96720

Hosaku L. Drake, Chairman  
State Department of Hawaiian Home Lands  
Old Federal Building  
335 Merchant Street  
Honolulu, Hawaii 96813

Kenneth Y.K. Au, P.E.  
Advance Planning Engineer  
Planning Branch, Highways Division  
State Department of Transportation  
600 Kapiolani Blvd., Room 301  
Honolulu, Hawaii 96813

Donna K. Kiyosaki, Chief Engineer  
County of Hawaii  
Department of Public Works  
25 Aupuni Street  
Hilo, Hawaii 96720

Virginia Goldstein, Director  
Planning Department  
County of Hawaii  
25 Aupuni Street  
Hilo, Hawaii 96720

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The FHWA, as lead agency, in cooperation with the State and County of Hawaii and the Department of the Army, is resuming project development work for the DAR funded portion of the improvement, which includes environmental clearance for the entire route and final design for the portion within the PTA. The environmental evaluation work begins at approximately Milepost 5 outside of Hilo (the junction of the proposed Punaluu Street Extension project with the Saddle Road) and ends at the Saddle Road intersection with State Highway 190, Mamalahua Highway. At present, the proposed construction would encompass only the work within the approximate limits of the PTA.

In view of the expanded scope of this project, the Federal Highway Administration, Central Federal Lands Highway Division, will hold an interagency scoping meeting to discuss your agency's needs and concerns as well as the needs and concerns of other agencies. The meeting will be held on Tuesday, May 10, 1994, beginning at 2:30 p.m. in the conference room at the Hilo Yacht Club, 77 Lechala, in Hilo. We ask that you or your representative attend this meeting.

The purpose of this meeting is two-fold: 1) to give you information about the proposal -- what has been done to date, what is being proposed, projected time frames and schedules; and 2) to receive from you information about procedures the project development team will need to follow to comply with your agency's requirements. A copy of the agenda is enclosed for your reference. Mr. William R. Bird, Environmental Planning Engineer, in FHWA's Central Federal Lands Highway Division will chair the meeting.

We look forward to meeting with you on May 10. Should you have any questions, Mr. Bird can be contacted by telephone at (303) 969-5909 or you may call Mr. Bill Moore, Okabara & Associates, in Hilo at (808) 961-5527.

Sincerely,

RUST Environment & Infrastructure

*James D. Anderson*  
James D. Anderson, P.E., R.L.S.  
Manager of Special Projects

BLK/JDA:sjm

Enclosures

cc: J.L. Budwig, FHWA, CFLHD, Attn: Bill Bird (HPD-16) Denver, CO  
Bill Moore, Okabara & Associates, Hilo, HI

8771504194A.114

Keith Abue, Chairperson  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809

Charles Weikha, District Manager  
DLNR Division of Forestry and Wildlife  
P.O. Box 4849  
Hilo, Hawaii 96720

Charles K. Supe, State Parks Superintendent  
DLNR State Parks Division  
Hawaii Parks Section  
State Office Building  
75 Aupuni Street  
Hilo, Hawaii 96720

Rex Johnson, Director  
Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813

Hugh Ono, District Engineer  
Department of Transportation  
Hawaii District-Highway Division  
50 Makala Street  
Hilo, Hawaii 96720

Victor Viera, Chief  
Hawaii County Police Department  
349 Kapiolani Street  
Hilo, Hawaii 96720

Saddle Road Project  
April 19, 1994  
Page Four

Hawaii DAR A-AD-6(1), Saddle Road  
**INTERAGENCY SCOPING MEETING**

May 10, 1994

Brooks Harper, Deputy Field Supervisor  
US Fish and Wildlife Service  
3 Waterfront Plaza  
500 Ala Moana Blvd., Suite 580  
Honolulu, Hawaii 96813

James Jacoby, Station Manager  
National Biological Survey  
Hawaii Field Research Station  
P.O. Box 44  
Hawaii Volcanoes National Park, Hawaii 96718

Alan Chin, Chief  
US Army Engineering Division  
Pacific Ocean  
ATTN: CEPOD-ED-E Alan Chin  
Fort Shafter, Hawaii 96858-5440

Wayne Hamaguchi, Chief  
Planning Branch  
ATTN: APEN-CP  
US Army Pacific Command, Hawaii  
Ft. Shafter, Hawaii 96858-5100

Col. Gerald F. King, Commander  
ATTN: AFZV-CO  
United States Army Support Command, Hawaii  
Ft. Shafter, Hawaii 96858-5000

Michael A. Cook  
Division Administrator (HDA-III)  
Federal Highway Administration  
P.O. Box 50206  
Honolulu, Hawaii 96850

Jeffrey R. Brooks  
Office of Program Development  
Federal Highway Administration  
211 Main Street, Room 1100  
San Francisco, CA 94105

Robert A. McLaren, Associate Director  
Institute for Astronomy  
2680 Woodlawn Drive  
Honolulu, Hawaii 96822

**AGENDA**

- I. Introductions
  - A. People present
  - B. Federal Highway Administration/Consultants
- II. Background
  - A. Description of project
  - B. Original/expanded scope
  - C. Roles and responsibilities for project development
  - D. Summary of activities to date
- III. Purpose of this Meeting
  - A. Update on recent developments
  - B. Direction of future work
  - C. Interagency coordination
  - D. Agency concerns/requirements
- IV. Discussion Topics
  - A. Realignment through PTA
  - B. Scope of project/project termini
  - C. Other potential alternatives
  - D. Issues to be addressed
  - E. Projected schedule
  - F. Agency concerns
  - G. Other topics
- V. Close out





U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

March 21, 1994

In Reply Refer To:  
HPD-16

**INTERESTED AGENCIES, ORGANIZATIONS, AND CITIZENS:**

The Federal Highway Administration (FHWA), in cooperation with the State of Hawaii, the County of Hawaii, and the U.S. Department of the Army, will prepare an environmental impact statement (EIS) for the proposed improvement of a portion of Hawaii State Highway (SH) 200, Saddle Road. The portion to be covered by the EIS begins in Hilo, Hawaii, at approximately milepost 5 at the intersection with the proposed Puainako Street extension and proceeds westward approximately 48 miles to the junction with Hawaii SH 190, Mamalahoa Highway.

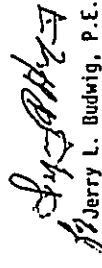
The proposed improvement will be a two-lane paved roadway with paved shoulders. The purpose of this proposal is to provide a safe, functional road by improving roadway geometrics and eliminating existing safety hazards, including conflicts between the traveling public and military training operations in the Pohakuloa Training Area (PTA). The Military Traffic Management Command has authorized Defense Access Road funds to prepare an EIS for the 48 miles of Saddle Road, described above, to include such preliminary design work as may be necessary to complete the EIS and for engineering design work for the 13-mile section within the PTA.

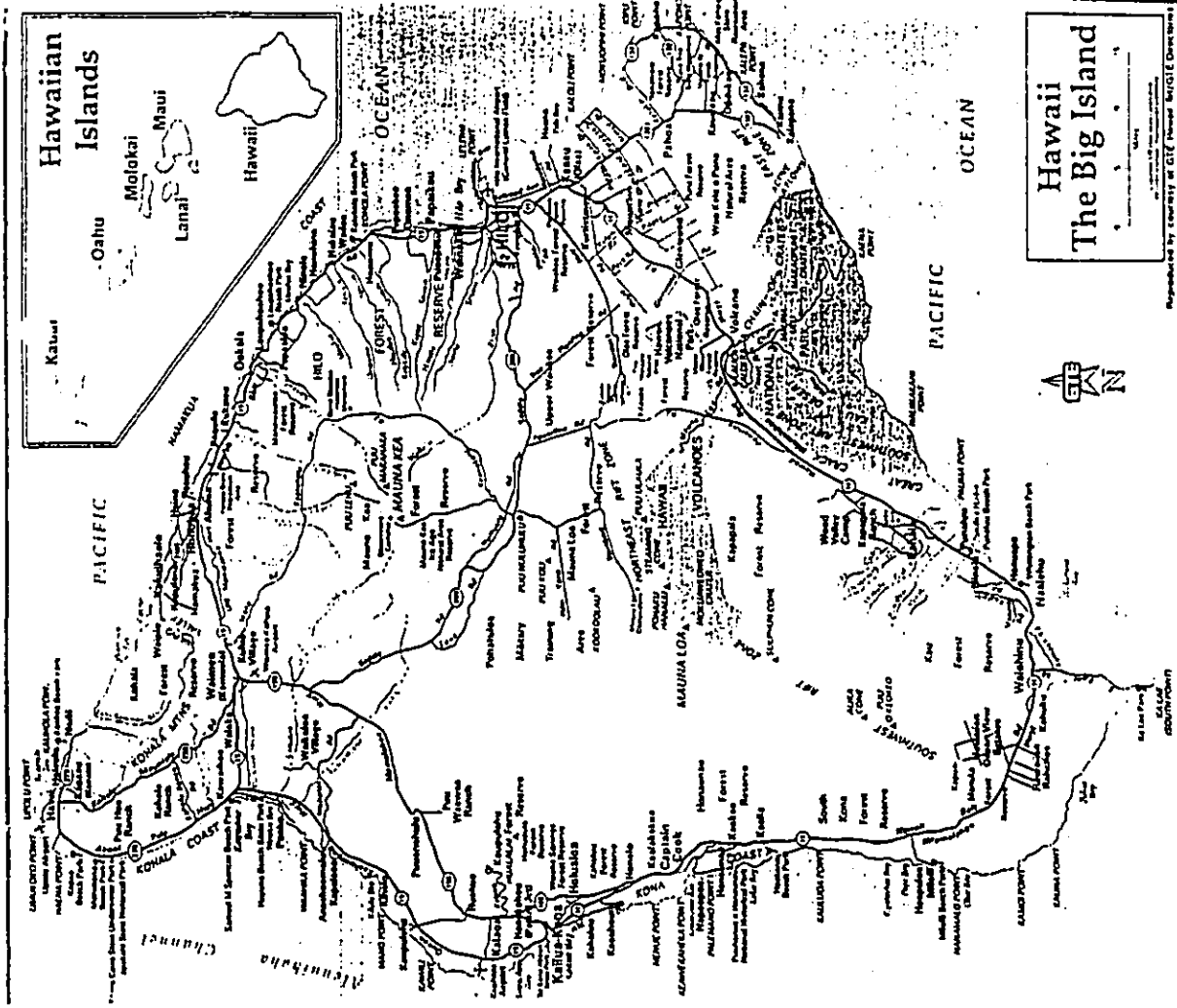
Alternatives under consideration include: (1) the "no build" alternative; (2) improve the existing facility to American Association of State Highway and Transportation Officials design criteria; and (3) improve the existing road, as in (2) above, with a northward realignment around the PTA. Other alternatives, including additional realignments that are developed during the scoping process, will also be evaluated.

This notice is being sent to appropriate Federal, State, and local agencies and to private organizations and citizens who have expressed interest in this proposal. Interagency meetings, public scoping meetings, and public hearings will be held in the project vicinity and at other appropriate places. Information on the time and place of public scoping meetings and public hearings will be provided in the local news media. The draft EIS will be made available for public and agency review and comment prior to the hearings.

To ensure the full range of issues are addressed and all significant issues are identified, comments and suggestions are invited from all interested parties. Your comments and questions concerning the proposed action should be directed to the FHWA at the above address, Attention: HPD-16, Environment.

Sincerely yours,

  
Jerry L. Budwig, P.E.  
Division Engineer



Hawaii State Highway 200, Saddle Road



# University of Hawaii at Manoa

Institute for Astronomy  
2680 Woodlawn Drive • Honolulu, Hawaii 96822  
Telex: 723-8459 • UHAST HR

Office of the Director

April 14, 1994

Federal Highway Administration  
Attn: HPD-16, Environment  
P. O. Box 25246  
Denver, CO 80225-0246

Dear Sir or Madam:

Subject: Improvement of Hawaii State Highway 200, Saddle Road

We have received your EIS Notice of Preparation for the subject project, dated March 21, 1994. The University of Hawaii Institute for Astronomy has management responsibility for the Mauna Kea Observatories (MKO) located at the summit of Mauna Kea. The MKO uses the Saddle Road extensively for access from both Hilo and Waimea, and therefore has a strong interest in this project.

Accordingly, we request that you keep us on the mailing list for notices of scoping meetings and hearings. We would also like the opportunity to review and comment on the draft EIS when it is available. Please address all correspondence to:

Director  
Institute for Astronomy  
2680 Woodlawn Drive  
Honolulu, HI 96822

Yours sincerely,

Robert A. McLaren  
Associate Director

RAM:nlj

AN EQUAL OPPORTUNITY EMPLOYER

14850 FEDERAL REGISTER / Vol. 59, No. 61 / Wednesday, March 30, 1994 / Notices

**Description of Relief Sought/Disposition:** To extend Exemption No. 5421 to continue to conduct external-load operations (i.e., offshore oil drilling operations) in the United States using a Canadian-registered Aerospacial AS-332L Puma helicopter.  
**GRANT:** March 22, 1994. Exemption No. 5421A.  
(FR Doc. 94-7419 Filed 3-29-94; 8:45 am) (Mandate code 4114-14)

**Federal Highway Administration**  
Environmental Impact Statement  
Greene County, MO

**AGENCY:** Federal Highway Administration (FHWA), DOT.  
**ACTION:** Notice of Intent.

**SUMMARY:** The FHWA is issuing this notice to advise the public that an environmental impact statement (EIS) will be prepared for a proposed project in Greene County, Missouri.  
**FOR FURTHER INFORMATION CONTACT:** Mr. Donald Neumann, Federal Highway Administration, P.O. Box 1747, Jefferson City, MO 65102. Telephone Number 314-636-7104; or Mr. Bob Steddo, Design Engineer, Missouri Highway and Transportation Department, P.O. Box 270, Jefferson City, MO 65102. Telephone Number 314-751-2876.  
**SUPPLEMENTARY INFORMATION:** The FHWA, in cooperation with the Missouri Highway and Transportation Department (MHTD), will prepare an environmental impact statement (EIS) on a proposal to upgrade Missouri Route 160 to a dual-lane facility from Route 60 to the James River Freeway in Greene County, Missouri. An MHTD reconnaissance report determined that the upgrade of Route 160 would accomplish several goals: (1) Provide a system link between Route 60 and the James River Freeway; (2) Improve safety and capacity for through traffic; and (3) promote economic development and planned growth in the city of Springfield and Greene County.

1. The proposed highway project runs approximately 2.2 miles between Route 60 and the James River Freeway in Greene County. The proposed facility would provide a four-lane, limited-access roadway with at-grade intersections or interchanges at major arterial crossroads.

2. Alternatives under consideration include "build" alternatives and a "no build" alternative, as well as mass transit and transportation system management options.

3. To date, preliminary information has been issued to local officials and

other interested parties. The scoping process will be initiated with Federal, State, and local agencies as early as possible. Further public hearings will be held. To ensure that the full range of issues related to this proposed action are addressed and all significant issues are identified, comments and suggestions are invited from all interested parties. Any comments or questions concerning this proposed action and the EIS should be directed to the FHWA or the Missouri Highway and Transportation Department at the addresses provided above.

Issued on: March 8, 1994.  
Donald Neumann,  
Program Review Engineer, Jefferson City,  
FR Doc. 94-7412 Filed 3-29-94; 8:45 am  
Mandate code 4114-14

**Environmental Impact Statement**  
Hawaii County, HI  
**AGENCY:** Federal Highway Administration (FHWA), DOT.  
**ACTION:** Notice of Intent.

**SUMMARY:** The FHWA is issuing this notice to advise the public that an environmental impact statement (EIS) will be prepared for a proposed highway project in Hawaii County, Hawaii. This notice revises and replaces the FHWA notice of intent published on December 2, 1991, which addressed a 14.5-mile portion of the currently proposed project.

**FOR FURTHER INFORMATION CONTACT:** W.R. Bird, Environmental Planning Engineer, Federal Highway Administration, P.O. Box 25246, Denver, Colorado 80225-0246, telephone 303-969-8999.

**SUPPLEMENTARY INFORMATION:** The FHWA, in cooperation with the state of Hawaii, the county of Hawaii, and the U.S. Department of the Army, will prepare an EIS for a portion of Hawaii State Highway (SH) 200, Saddle Road. The portion of Saddle Road covered by this notice of intent begins in Hilo, Hawaii, at approximately milepost 5 (the intersection with the proposed Pōhāhā Street extension) and proceeds approximately 48 miles westward to the junction with Hawaii SH 190, the Mamala Highway. The proposed improvement will be a two-lane paved roadway with paved shoulders. The purpose of this proposal is to provide a safe and functional road by eliminating existing safety hazards, including conflicts between the traveling public and military training operations. The Military Traffic Management Command has authorized Defense Access Road

funds to prepare an EIS for the entire length of Saddle Road (including such preliminary design work as may be necessary for completing the EIS) and for engineering design work for the 14.5-mile section within the Pōhāhā Training Area (PTA). Alternatives being evaluated include: (1) The "no build," (2) the improvement of the existing facility to approved Hawaii State Department of Transportation design criteria, and (3) improvement of the existing road, as in (2) above, with a northward realignment at the PTA. Other alternatives, including additional realignments that are developed during the scoping process, will also be evaluated.

Notices describing the proposed action and soliciting comments will be sent to appropriate Federal, State, and local agencies and to private organizations and citizens who have expressed interest in this proposal. Intra-agency meetings, public scoping meetings, and public hearings will be held in the project area and in other appropriate areas. Information on the time and place of public scoping meetings and public hearings will be provided in the local news media. The draft EIS will be available for public and agency review and comment prior to the hearings.

To ensure that the full range of issues related to the proposed action are addressed and all significant issues are identified, comments and suggestions are invited from all interested parties. Comments and questions concerning the proposed action should be directed to the address provided above.  
(Catalog of Federal Domestic Assistance Program Number 20.105, Highway Research, Planning and Construction. The regulations implementing Executive Order 12372 regarding intergovernmental consultation on Federal programs and activities apply to this program.)  
Issued on: March 21, 1994.  
James W. Kealey,  
Acting Division Engineer, FHWA, Denver, CO.  
(FR Doc. 94-7401 Filed 3-29-94; 8:45 am) (Mandate code 4114-14)

**Maritime Administration**  
(Docket A-184)  
Keystone Shipping Co., et al. v. United States of America, Civil Action No. 90-2782

The Maritime Administration (MARAD) is providing an opportunity for submission of comments by all interested parties concerning the record by the District Court for the District of Columbia on September 2,

JOHN WILSON  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF EDUCATION

P. O. BOX 194  
HONOLULU, HAWAII 96810

OFFICE OF THE SUPERINTENDENT

April 20, 1994

Federal Highway Administration  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246  
Attn: HPD-16, Environment

Dear Sir:

SUBJECT: Proposed Improvement of a Portion of Hawaii State  
Highway (SH) 200, Saddle Road

We respectfully request a proposed project map of the subject improvements in the Hilo area. The Department of Education (DOE) is concerned that the subject road improvements will impact on Kaumana Elementary School in Hilo.

The DOE will require that mitigating measures be implemented by the developer to minimize disruptions caused by noise, dust, and traffic during the construction period. If noise and dust levels exceed Department of Health standards, we will require the developer to install air-conditioning for those classrooms being impacted by this project.

Should there be any questions, please call the Facilities Branch at 737-4743.

Sincerely,

*Herman A. Alkava*  
Herman A. Alkava, Ph.D.  
Acting Superintendent

HMA:hy

cc: A. Suga  
A. Garson

HELEN H. ALZADA  
Acting Superintendent

2.3.1



DEPARTMENT OF BUSINESS,  
ECONOMIC DEVELOPMENT & TOURISM

Central Record File: 779 Main Eng Bldg 10th Floor Honolulu, Hawaii  
Mailing Address: P.O. Box 1537 Honolulu, Hawaii 96810 Telephone: (808) 546-1400 Fax: (808) 546-2177

April 21, 1994

Mr. Jerry L. Budwig  
Division Engineer  
Central Federal Lands Highway Division  
Federal Highway Administration  
U.S. Department of Transportation  
P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Budwig:

The Department of Business, Economic Development & Tourism is pleased to submit the enclosed comments on the Preparation of an Environmental Impact Statement for the Proposed Improvement of a Portion of Hawaii State Highway 200, Saddle Road.

The comments were provided by the Land Use Commission. Questions regarding these comments may be directed to Esther Ueda, LUC Executive Office, at (808) 587-3826.

Thank you for the opportunity to comment.

Sincerely,

*Muif Hambergmann*  
Muif Hambergmann

Enclosure

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

2.1.1  
JOHN WILSON  
GOVERNOR  
HELEN H. ALZADA  
Acting Superintendent  
MICKIE  
DORIS  
JEANNE E. JO  
LUCAS  
TALLEY  
DORIS

MAIL ROOM  
CORRESPONDENCE



STATE OF HAWAII  
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM  
LAND USE COMMISSION  
Room 164, 04A Federal Building  
Honolulu, Hawaii 96813  
Telephone: 571-3333

April 20, 1994

SUBJECT: Director's Referral No. 94-125-0  
Preparation of an Environmental Impact Statement (EIS)  
for the Proposed Improvement of a Portion of Hawaii  
State Highway (SH) 200, Saddle Road

We have reviewed the letter dated March 21, 1994, and have the following comments to offer:

- 1) Based on the map provided, portions of the subject project appear to be located within the State Land Use Urban, Agricultural and Conservation Districts.
  - 2) We suggest that the Draft EIS include a map showing the project site in relation to the State Land Use Districts.
  - 3) We also suggest that a listing of the Tax Map Keys affected by the project be included in the Draft EIS.
  - 4) We would also like to note that portions of the project site are proposed to be reclassified as part of the Office of State Planning's 5-Year Boundary Review.
- We have attached for your information, a map showing the proposed reclassification area as provided in the 1992 State Land Use District Boundary Review prepared by the Office of State Planning.

We have no other comments to offer at this time.

EU:km

LETTERS FROM  
SECURITY OFFICE

JOHN VAHRE  
STATE DEPARTMENT OF LAND



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF FORESTRY AND WILDLIFE  
1111 KUMUHOA STREET  
HONOLULU, HAWAII 96813

May 3, 1993

Mr. Bill Moore  
Federal Highway Administration  
c/o Okahara and Associates  
200 Kohola Street  
Hilo, Hawaii 96720

Dear Mr. Moore:

This acknowledges receipt of the notice of April 19, 1994 concerning the public scoping meetings for the proposed improvements of Hawaii State Route 200, Saddle Road. We are responding also as a result of your letters (from RUST Environment and Infrastructure Inc.) to Mr. Keith W. Ahuc, Chairperson of the Department of Land and Natural Resources and Mr. Charles Wakida, Hawaii Island manager for the Division of Forestry and Wildlife.

We are pleased that a full environmental impact statement is to be prepared for this proposal because we have serious concerns over the potential for damage to the natural resources of the Mauna Kea and Pohakuloa areas. A relocation of the road along the northern boundary of the Pohakuloa Training Area could have serious impacts on the native mamani-naio forest, the critical habitat of the endangered Palila, and native plants and wildlife in general. We are also concerned about the potential for wildfires along this alignment as it is immediately adjacent to the Mauna Kea Forest Reserve.

Please add the undersigned to your mailing list for all future notices of scoping, informational, and public meetings and copies of draft environmental documents. We are very concerned

3 7-1-94 K.C. R.S. (1)

KEITH W. AHUC, CHAIRPERSON  
DIVISION OF LAND AND NATURAL RESOURCES

DEPT. OF LAND AND NATURAL RESOURCES  
JOSEPH SCOTT  
TOMAS HANAUZ  
PROGRAM  
AGRICULTURE DEVELOPMENT  
ADULT RESOURCES  
BOATING AND OCEAN RECREATION  
CONSERVATION AND RESTORATION  
ENVIRONMENTAL AFFAIRS  
CONSTRUCTION AND REPAIRS  
FORESTRY AND WILDLIFE  
CONSERVATION  
HISTORIC PRESERVATION PROGRAM  
LAND MANAGEMENT  
STATE PARKS  
WATER AND LAND DEVELOPMENT

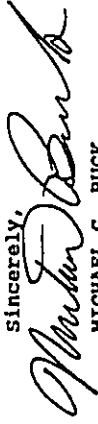
RECEIVED  
MAY 10 1994

OKAHARA & ASSOC., INC.  
HILO OFFICE

Mr. Bill Moore  
Page 2  
May 3, 1994

about this project and want to participate fully in the study and decision making process.

Sincerely,



MICHAEL G. BUCK  
Administrator

cc: Charles Wakida  
Keith W. Ahue, Chairperson



## United States Department of the Interior

NATIONAL PARK SERVICE  
Western Region  
600 Harrison Street, Suite 600  
San Francisco, California 94107-0372

IN REPLY REFER TO

ER-94/0304

May 5, 1994

Mr. W. R. Bird  
Environmental Planning Engineer  
Federal Highway Administration  
P.O. Box 25246  
Denver, CO 80225-0246

Dear Mr. Bird

This letter is in response to a Notice of Intent to Prepare an Environmental Impact Statement for SE-200, Saddle Road Improvements, Hilo to SH-190, Hawaii County, Hawaii. We have the following comments about the proposed project.

### GENERAL COMMENTS

The notice identifies only one possible project route: the existing road. The road passes through a dry high elevation environment.

### NATURAL RESOURCES

An adequate species inventory has not been prepared for the area covered by the proposed project. Since dry elevations are rare in Hawaii, we recommend that one be prepared before further action is taken on this project.

### CULTURAL RESOURCES

Cultural resources may exist in the area of the proposed project. We know that ancient Hawaiians used upland areas. A 1990 survey by the National Park Service of Saddle Road from Milepost 29.5 to Milepost 44 identified resources from the Mauna Kea Adze Quarry, a National Historic Landmark.

The 1990 survey raises the possibility that cultural resources also exist on the part of the road covered by the planned project. No archaeological survey has been made of the area. We recommend that a survey at the same level of coverage and intensity as the 1990 survey be prepared before further action is taken on the project.

15.1

ADDITIONAL COMMENTS

A high speed road through the Pohakuloa Training Area may not be feasible. Therefore, we recommend that the environmental impact statement identify all alternative corridors for realigning or relocating Saddle Road, including cutoffs and potential staging areas.

For further information about natural resource issues please contact Dan Taylor, Hawaii Volcanoes National Park, (808) 967-8226. You may contact Holly Dunbar at the National Park Service Western Regional Office, (415) 744-3916, about cultural resource concerns. Your contact in this office is Chris Gentry. He can be reached at (415) 744-3968.

Thank you for the opportunity to provide these comments.  
Sincerely,

*Bruce M. Wilson*

for Margaret Pepin-Donat  
cc: Dan Taylor, HAVO  
Holly Dunbar, WRO  
DOI, Office of Environmental Policy and Compliance, 1849 C. Street NW, Wash DC 20240  
WASO 774  
Pat Port, Environmental Affairs



STATE OF HAWAII  
DEPARTMENT OF HAWAIIAN HOME LANDS  
P O BOX 1470  
HONOLULU, HAWAII 96813

May 6, 1994

Mr. Bill Moore  
c/o Okahara & Associates  
200 Kohola Street  
Hilo, Hawaii 96720

Dear Mr. Moore:

Subject: Proposed Saddle Road Improvements

Thank you for inviting us to participate in the scoping meetings to help identify issues and concerns regarding the proposed improvements of Hawaii Defense Access Road A-AD-6(1), State Route 200, Saddle Road.

We understand that although the proposed construction would encompass only the work within the approximate limits of the U.S. Army Pohakuloa Training Area (PTA), a full Environmental Impact Statement (EIS) will have to be prepared covering almost the entire length of Saddle Road to address the impacts of cumulative future improvements.

The Department of Hawaiian Home Lands (DHHL) is an interested party because approximately eight miles of the Saddle Road crosses our Hawaiian home lands (HHL) at Humuula. Past realignments and widenings of the Saddle Road have improperly taken portions of HHL. The DHHL is negotiating claims against the State to settle the matter.

Should the proposed project encompass the use of additional Hawaiian home lands, prior approval will be required from the DHHL's executive board, the Hawaiian Homes Commission.

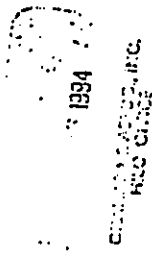
If you have any questions, please feel free to contact Darrell Yagodich of our Planning Office at (808) 586-3836.

Marmest aloha

*Holly Dunbar*  
Holly Dunbar, Chairman  
Hawaiian Homes Commission

HLD:DY:JC:asy/3271L

HIILAKU I. DRANT  
CHAIRMAN  
HAWAIIAN HOMES COMMISSION





STATE OF HAWAII  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

278 SOUTH KING STREET  
FOURTH FLOOR  
HONOLULU, HAWAII 96813  
TELEPHONE 588-1175  
FACSIMILE 588-1173

May 9, 1994

Federal Highway Administration  
c/o Okahara & Associates  
200 Kohola Street  
Hilo, Hawaii 96720

Attention: Mr. Bill Moore  
Dear Mr. Moore:

Subject: Saddle Road Improvements

Please be advised that in order to satisfy requirements of Hawaii Environmental Impact Laws, an Environmental Assessment and an Environmental Impact Statement Preparation Notice (EISP/N) must be processed prior to submission of a draft EIS. The EISP/N process allows for a 30-day public comment period as part of the scoping process for an EIS.

State and Federal EIS requirements differ in this regard, and the Federal Notice of Intent does not fulfill requirements of the state EIS Preparation Notice.

If you have any questions, please call Ms. Betty Wood at 586-4185.

Sincerely,

*Bruce S. Anderson*  
BRUCE S. ANDERSON, Ph.D.  
Interim Director

BSA/BW:kk

c: Mr. Rex D. Johnson  
Director of Transportation

Ms. Donna Fay Kiyosaki, Chief Engineer  
Public Works Department, County of Hawaii

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Saddle Road Task Force

Interagency meeting - Summary of Issues and Concerns  
May 10, 1994

An inter-agency coordination meeting was held on May 10, 1994. Representatives of the following agencies attended the meeting:

Federal

- U. S. Department of the Army - Pohakuloa Training Area
- U. S. Department of the Army - Hawaii Garrison
- U. S. Department of the Army - Department of Public Works
- U.S. Army Corps of Engineers
- U. S. Fish and Wildlife Service
- National Biological Survey

State

- Department of Land and Natural Resources - Land Management Division
- Department of Land and Natural Resources - Historic Sites Division
- Department of Land and Natural Resources - State Parks Division
- Department of Land and Natural Resources - Forestry and Wildlife Division
- Department of Hawaiian Home Lands
- Department of Transportation

Hawaii County

- Department of Public Works
- Planning Department
- Police Department

The following is a brief listing of the key issues and concerns identified by each agency:

DLNR-Forestry and Wildlife

- o Opposed to relocation of alignment to north of PTA. Area is critical habitat for Palila, public hunting area, and important dryland forest.
- o Realignment would compromise fire-fighting ability
- o Concern with southern alignments to Mamalahua Highway. Alignments go through undisturbed areas, public hunting areas, and native dryland forests.

- o Potential alignments need to consider other factors including vandalism, remoteness of areas, impact on open space goals of the Conservation District.
- o Prefer not to disturb pristine areas. Consideration should be given to areas already disturbed.
- o PTA is part of the State's game management area. Mauna Kea used to be key hunting area. However, because of Palila, there is limited hunting. Area is primarily used for bird hunting.
- o Alignment north of PTA would go through public hunting areas.
- o Southern alignments to Mamalahoa Highway would go through a public hunting area.
- o The two northernmost alignments would not have any impact on public hunting as they go through private land.

U. S. Fish and Wildlife Service

- o Areas north of PTA are designated as "critical habitat" for the Palila. USF&WS must ensure that project does not adversely impact the habitat.
- o There is no "critical forest bird habitat" as yet. Area is considered "essential" but does not have same protection under the law.
- o There are 13 rare and 5 endangered plants with PTA, including 6 species with the general alignment corridors.
- o The southern alignments to Mamalahoa Highway have "massive potential for conflict".

National Biological Survey

- o Can't focus only on road corridor. Need to look at potential impact on surrounding area as well. Roads act as vector to introduce new species.
- o Asked what were plans for lighting. May have impact on upland nesting sea-birds including the Dark Rump Petrel and the Shearwater.

Army Corp of Engineers

- o Need to follow Federal process with respect to cultural resources, including working with OHA, State Historic Preservation Office and Advisory Council on Historic Preservation.
- o Northern most alignment to Mamalahoa Highway is favored from a potential impact on cultural resources.
- o Southern alignments to Mamalahoa Highway may have major concerns/impacts.
- o No information on eastern alignment (towards Hilo).
- o Historic Resources include anything over 50 years in age. Consequently, the project must consider WWII relics as potentially significant.
- o Cultural resources needs to be part of social impact assessment. "Sacred" areas need to be identified.

State Department of Hawaiian Home Lands

- o Concerns with both widening existing alignments as well as potential alignments through DHHL lands.
- o There is no eminent domain, consequently, all land acquisition must be through negotiation. DHHL is open to negotiation but must protect "Trust" responsibilities. Land replacement is necessary.
- o The quarry on the western end of the property must be protected. This is still used by DHHL.
- o DHHL will identify concerns in more detail as requested.

Institute for Astronomy

- o If any street lighting is proposed, requesting that modelling be conducted to test impact on the observatories.
- o Observatory operations may be impacted by road construction activities.



State Department of Land and Natural Resources - State Parks Division

- o \$500 million of construction on the observatories in planned. Need to accommodate hauling of mirrors and other large pieces up to 30" wide.
- o All lighting should conform to County Lighting Code and be fully shielded.
- o Astronomy traffic is currently evenly balanced between Hilo and Waimea. However, as future base facilities are built in Hilo, the traffic impacts will shift to the eastern side by a 2:1 ratio.
- o Concern with improvements opening up the road to tourists. They may try to get up to summit in rentals.
- o Concern with fog and visibility problems with road and increased speeds.

State Department of Transportation

- o State current is requesting between \$50 and \$60 million to improve the Saddle Road. This project provides Federal Funds to accomplish this.
- o Project provides opportunities to assist economy during downturn in sugar.
- o If first phase is done through PTA, chances are the rest of the project will be completed. If this project isn't started, the chances of success are diminished.

Police Department

- o Since improvements to Saddle Road began, traffic has increased. Additional improvements will result in further increases in traffic.
- o Improvements to the road will increase traffic speeds.
- o There has been an decrease in accidents since the improvements to Saddle Road began. The primary reason is that the wider shoulders allow recovery time.

State Department of Land and Natural Resources - Land Management Division

- o All State lands in area are "Ceded Lands".

**MINUTES**  
**Saddle Road Scoping Meeting 1**  
**Tuesday, May 10, 1994 - 7:00 PM**  
**County Council Room, HILO**

**1. Introduction**

Mr. William R. Bird, Central Federal Lands Highway Division  
Brief statement of purpose of scoping meeting - early information gathering to hear community ideas, concerns on what we should do, where we should go on improving Saddle Road. Soliciting direction from general public for project scope which has changed from widening/improving existing road, as determined from an earlier Scoping, to realignment of State Highway Route 200. Mr. Bird then introduced and turned the meeting over to Mr. William Moore of Okahara and Assoc., local consultant and moderator.

Mr. Moore reiterated purpose of public meeting; in addition, requested informality and the use of two rules, an opportunity for all to speak and respect for all opinions given.

**2. Background**

- Organizational chart of roles and responsibilities for project development (attached) and introduction of members present.
- Scope of the project administered by the Department of Defense through Defense Access Road (DAR) Program and the Federal Highways Administration.
- Scoping meetings to be held through August of '94 to (1) garner community concerns, and (2) identify realignment.

**3. Purpose**

Environmental Impact Statement (EIS) found necessary, rather than Environmental Assessment, due to new and broader scope of project. Accident rate now close to 1986 projection, 6.14 per million vehicle miles (MVM), compared to statewide average, 2.72 MVM, the reason being variations in vehicle type and speeds used, as well as weather conditions. Also, the scoping process is required by the national Environmental Protection Agency. Moore requested assistance in asking the right questions.

**4. Discussion topics**

EIS completion date expected in 1997. Construction Design phase expected to begin in 1998. Federal funds for realignment through Pohakuloa Training Area (PTA) only - as PTA maneuvers are on the south of the highway while supplies/support centers are on the north, there is much military traffic on that particular portion mingling with civilian traffic. Design phase for the portion expected to last two years.

Explanation of possible realignment routes/maps - Beginning at the 5 Mile Marker on the Hilo side of Rt. 200, there are three possible termini on the Kona side: (1) Kiholo, (2) Waikoloa, and (3) Puuanahulu.

Explanation of criteria for sensitive areas/maps - Endangered species/Habitat areas, Urban/Ag areas, Hunting areas, Volcanic Hazard zones.

**5. Q/A session**

**Q.** Abandon Saddle Road to the military and hunters. New construction is cheaper. Saddle Road is mainly for moving the military. This is the 21st Century. A high speed monorail from Hilo to Kona is the answer, with eventual feeder inserts to north and south. Possible source of funding - Federal Aviation.

**Q.** Do both. Saddle Road still needs to be fixed. Use the DOD funds while they are available.

**Q.** Is it true that the military is increasing its permanency?

**A.** Not true.

**Q.** I am a Conservation officer with DLNR but am here representing myself as an individual. Use the existing road, widen it. There are palia/dryland forests and endangered plants in the area. The real cause of danger on Saddle Road is ourselves. Drive slow, 25 mph. The problem is there are no police patrols so everyone drives fast.

**Q.** What type of improvement will be done to the curves?

**A.** Vertical and horizontal.

**Q.** Is funding available?

**A.** 2.3 M for the EIS. Additional funds will be sought for preliminary design and construction once commitment obtained.

**Q.** Where will this road connect, Waikoloa, Kona or the County General Plan?

**A.** What makes sense, the terminus. Kiholo is the midpoint, County General Plan is a state park.

**Q.** It is common sense to improve what's there, save money. Do it, not talk.

**Q.** What other infrastructure (affected), i.e. telephone, fibreoptics, observatory, power also?

**A.** There are corridors there for power, etc. It will be a coordinated plan with all agencies and interests.

**Q.** What other developments would follow, secondary impacts?

**A.** A part of scoping.

- Q. What would the elevation (of the road be), behind PTA?  
A. Unknown yet. Evolving.
- Q. There is a deep gulch there. It floods from the steep incline.  
A. Noted.
- Q. Are Rest Stops in your standards?  
A. Yes, part of the project.
- Q. What about the Puainako extension?  
A. Not a part of this project.
- Q. You will need to coordinate with the State Dept. of Transportation, County Public Works - funding mandates?  
A. Ongoing, will continue.
- Q. Biologically it makes no sense to use the existing road. What is the real intent? The most efficient use of federal funding would be to improve the Hamakua road vs. driving 1.5 miles up in the air. But follow as close as possible, existing road, avoid biological impact.
- Q. What will benefit is the real money maker, Astronomy.
- Q. Will the existing 2-lane roadway be kept?  
A. Not through PTA.
- Q. Design criteria by vehicle weight? Mauna Loa, Mauna Kea, military.  
A. Pavement will be designed accordingly, width as well as height, i.e. accommodate 30' mirrors.
- Q. Waitiki Ranch letter... safety problem ... substandard pavement, unmarked curves - formula for death. Originally designed for slow passage ... 8 houses, 4/5 persons in each ..  
A. Include in scoping.
- Q. East West highway (sensible in light of) meteorological conditions?  
A. Noted.
- Q. Existing road require EIS? State and County were talking about this back in 1972.  
A. Yes.
- Q. Due to the fog conditions, will there be a partition (median strip), trees?  
A. No, two lane.
- Q. What will the speed limit be?  
A. To be determined (from scoping/project development process).
- Q. Because there is fog on the road in the evenings, how about putting a sign at each terminus giving weather conditions.  
A. Noted.
- Q. What would the (proper?) design speed be?  
A. Conceptually, 50 mph. Maximum gradient 8 percent to fit topography.
- Q. If the Design phase begins in 1997/98, when will it be finished?  
A. In two years, through PTA only.
- Q. Do we have to work with the military?  
A. Has to be part of it.
- Q. What would be the costs of current road improvement?  
A. Not a part of this project.
- Q. Regarding fibreoptics/ telephone, cellular, etc., I hope communications will be addressed in the EIS.  
A. Yes. Met specifically with astronomers, utilities, etc..
- Q. Recommendation: contact Hawaiians for knowledge of historic places.  
A. Archeology, culture, sacred places all part of EIS study.
6. Adjourn  
There being no further questions the meeting closed at 8:20 PM.

  
SECRETARIAT

### MINUTES

Saddle Road Scoping Meeting 2  
Wednesday, May 11, 1994 - 7:00 PM  
Kona Beach Hotel, KAILUA-KONA

#### 1. Introduction

Mr. William R. Bird, Central Federal Lands Highway Division introduced national consultants James Anderson and Bernie King of RUST Environmental and Infrastructure Inc., and local consultant Bill Moore of Okahara and Associates. Described scoping meeting a few years ago at which time the intent of the project was just to fix the existing road. Subsequently the decision was made to address the entire route, which changed the project to a major one. Brief statement of purpose of present scoping meeting - information gathering to hear community ideas, concerns which would be of benefit to the road or to the community itself, though no commitments given to date. Scoping process expected to last until late summer at which point the project is expected to take a direction and evaluations and in-depth studies can begin. Mr. Bird then introduced and turned the meeting over to Mr. Moore.

Mr. Moore introduced Project Manager Dave Gedeon of the Federal Highways Administration, reiterated purpose of scoping meeting - garner community concerns and issues, consideration of community role as potential opportunity and requested the use of two rules, an opportunity for all to speak and respect for all opinions given.

#### 2. Background

Presentation of organizational chart of project development (attached), introduction of resources present, and elaboration on critical nature of public role as "eyes" for the project, consensus process. Scope of the project/potential alignments - termini: From Wilder Road on the East side, (5 Mile Marker), to four potential termini on the West at Mamalahoa Hwy. Funding initially provided by the federal government through Defense Access Road (DAR) Program, when no other funds are available as is the case.

Accident rate study done in 1986 shows 6 plus accidents per million vehicle miles (MVM). The rate now slightly less but projected increase in traffic verified, 1000 per day. By the year 2000 expected rate of traffic is 4000 per day. Problems compounded by civilian vehicles traveling at 60 mph while military traffic proceeds at 35 mph, further compounded by the fact that military traffic must cross the road from jeep trails which is the only existing East West route.

3. Purpose  
Environmental study is a legal requirement by the National Environmental Protection Agency (NEPA). A three part process. Scoping definitions to be completed by, hopefully, Aug. '94. The second phase consists of studies in conceptual engineering, archeology, botany, etc. and is expected to last one year, completion expected mid-1995. The Environmental Impact Statement itself should be completed in 1997. The Design phase, which has already received federal funding commitment for the Pohakuloa section, begins subsequently and is expected to last approximately one year. Other portions of the road will need other funding authorization. Presently, the project is soliciting the public's assistance in identifying questions and issues to address, or, identify the scope of the project, as well as providing public awareness and input for the project.

#### 4. Discussion topics

Explanation of possible realignment routes/maps - Beginning at the 5 Mile Marker on the Hilo side, the intersection of Wilder Rd., there are possible alignments to alleviate the weaving of the road. A subsequent possible alignment, moving westward, is what is known as a "throwaway alignment" - which avoids Volcanic Hazard Zone 2. Further westward, at PTA, there are possible alignments which run behind Mauna Kea Access Rd. These alignments run into Hawaiian Homelands lands. Possible termini on the West side include the existing one which ascends and descends a section of the road known as "the seven steps." In order to avoid this altitudinal shift, a 2nd possible terminus extends the road to Waikoloa, using an existing power line corridor. Discussion of unformulated nature of scope - what is the purpose of the road, need for public input in order to reach decision of purpose. A third possible terminus, already adopted by the County General Plan, extends further south to Puuanahulu. A fourth possible terminus, suggested by the Saddle Road Task Force, extends slightly further south of number 3 above, gives the straightest possible alignment for the entire road.

#### Resource areas/maps:

- (1) Volcanic Hazard Zones
- (2) Critical/Essential Habitat Zones
- (3) Land Use Zones - Urban, Ag, Conservation
- (4) Hunting Zones - Puuanahulu area

#### 5. Q/A session

Q. Request #1 priority be a designated safety bike/peDESTRIAN lane, either on the shoulders of the road or a separate lane entirely.

Q. Can the military (installations) be moved to one side of the highway? With regard to military port-to-port movement, can soldiers be airlifted instead? Saddle Road is costly in terms of funding as well as aesthetically. Can the upgrade be done for safety instead of as a straight shot, for visitor/resident experience of the road. Also longevity of Pohakuloa questionable in the face of

# CORRECTION

THE PRECEDING DOCUMENT(S) HAS  
BEEN REPHOTOGRAPHED TO ASSURE  
LEGIBILITY  
SEE FRAME(S)  
IMMEDIATELY FOLLOWING

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Q. Like H4, an interstate highway qualifies for Federal Highway funds?  
A. On a state highway system, qualifies for some federal funding. New Intermodal Transportation Act did away with it. H3 is the last one to receive those funds.

Q. Is it possible to control the building of the road with regard to aesthetics, ie. additional highway systems such as National Park Service or Hawaiian Trails?  
A. Federal Highways Lands Divisions are road developers, not policy makers though appreciate the sentiment. The division is sensitive to environmental areas.

Q. Observatory has rules and guidelines regarding lights. There will be no lights on that road.

Q. Waikii Ranch letter - 1 1/2-lane road... smooth areas attracts speeders - suggest closing the road until it is safe, or repair it now - straighten, widen, use reflectors, diagonal black & white lines, signs for culverts. Need a long-term real road, not a country road. ...two times more dangerous than the national average.

Q. (Relating to secondary impact on infrastructure, specifically) water?  
A. This is not a water project.

Q. Regarding criteria for DAR funding, wouldn't it be the same to allow funds for all sections (of the road)?  
A. Its up to the military; mission focus on PTA.

Q. Tie in port to port, not criteria, access?  
A. To my knowledge this is not port-to-port (project).

Q. A concern: what is the cheapest way to do this? If we do more we pay more taxes.

Q. A common line in all that's been said tonight is why build the road. If a reason is given, then build accordingly, aesthetically.  
A. That's part of the criteria we are trying to identify here, part of the process.

Q. We need to find out why the road should be redone. If the reason is good and funding is available, it should be done. If the reason is not good, then it shouldn't be done. Funds would probably come from a special tax, i.e. gas. Five or six years ago, commerce was the reason. Now DOD has a certain interest. We'll just go round and round if we try to find funding. Funding will be available if the project is necessary.

Q. Another reason to make this a state route - there are 114,000 acres of state land open (not in use), with water/amenities available.

opposition to live ordinance. Why not run Saddle Road to the back side of Hualalai?

Q. Personal history of residence in Hawaii. Belief in the economic expansion of Hawaii Island, long range view/planning. 1950's road which ran behind PTA by Umi's Heiau was stopped by Mauna Loa lava flow. In the old days the Hawaiians planned a road from South Point to the mountains to Waipio and back around to Hilo. History on 1958 discussions of Kawaihae Kona Coast Road, Rockefeller and Gov. Burns.  
A. Moderator refocuses on task at hand.

Q. Do not like Waikoloa terminus one bit. Recommends another possible alignment be five miles south of Waikoloa, on Mamalahoa. Has hiked the area extensively and knows it to be the best gradient, also has one property owner - the State. Someday Waikoloa can build a lateral to it. This alignment would service more people, also a part of Bill Palm Highway Study done before PTA. Understands PTA necessity ... building behind Hualalai out of the question as long as PTA is there.  
A. Kulanui - Kohala boundary does have good gradient, presently used for military movement.

Q. The cost would be 2/3M per mile. Why spend 100B on a back road. Better left untouched.  
A. No cost estimates as of yet. Bigger question than we're charged to look at. NEPA policy - no bills requirement.

Q. What are the requirements for DAR funding? Is it harbor or airport (termini)?

A. Mamalahoa termini. Re. funding: 2.3M authorized funding for environmental study and preliminary design for full portion (of the road), and design within PTA area. Military is committed to area within PTA only but efforts to gain full funds necessary ongoing. Re. DAR requirement: Sudden and unusual impact of military traffic upon civilian traffic. Considerable portion of the road not military traffic, therefore ineligible.

Q. So where will the funding come from? I'm in the hotel business. Rent-a-cars cannot drive that road.

A. If people want it done... Request will be passed to Hawaii DAR.

Q. Clarify - funding from DAR for PTA studies only?

A. For (studies for) entire corridor.

Q. Is it safe to say if we want to push for it or stop it .. If there is no funding, fine, but will it be jammed down our throats?

A. EIS is a requirement of the project. It won't happen unless the study is done.

Q. I am disappointed with local architecture. Why are land use and transportation departments separate? For this purpose land use and planning departments should be together.

Q. This was a mayor's issue several terms ago. Why didn't anything happen then. What about the Judd Trail in 1859?

Q. Is this project all driven by military impact?

A. The military tries to use parallel roads as much as possible but have 5-ton truck and trailers which need the crossing being met by drivers going 60/65 mph. Don't like to be a nuisance but...safety index drops with need to get around the trucks.

Q. Is it an alternative to move the camp over (to the south side of the road)?

A. Yes, it is an alternative.

Q. What would be the difference be in cost?

A. The airfield is 3200' long - needs a long flat area. As the area of the endangered plant species is already closed on the south side, that would leave even less room than there is. It's an option but moving costs alone is \$150/200M for an airfield that is not used that often and has dangerous wind drafts.

Q. I don't like to follow the military (points - from Kawaihae to Saddle Rd.).

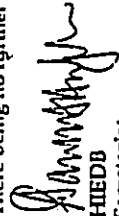
A. We can't go through a populated area with ammunition.

A. (State has already requested \$45M to improve maintenance standard for Saddle Road, commitment, letter signed for DAR; PTA funding 25 percent.

Recapitulation. Regular reports will be sent to those who signed up for the Saddle Road newsletter.

6. Adjourn

There being no further questions the meeting closed at 8:30 PM.

  
HIEDB  
Secretary

MINUTES  
Saddle Road Scoping Meeting 3  
Thursday, May 12, 1994 - 7:00 PM  
Kahilu Town Hall, WAIMEA

1. Introduction
  2. Background
  3. Purpose
  4. Discussion topics
- Similar to the two previous scoping.

5. Q/A session - focus: Do we need this project?

Q. Are we assuming that Pohakuloa is here to stay? If it is not, what chance is there of road improvement?

A. The source of funds will probably not be available. The State DOT has agreed to make a commitment to take over for the county. No change anticipated in Pohakuloa mission.

Q. Waimea Community Association concern - Waimea Bypass discussions with Hawaiian Homelands on hold. How will Saddle Road improvements impact the Waimea Bypass which is a state project? Will it be either/or?

A. These are two separate projects. This is DOD funded. It is not a question of this or that. This project will not affect nor compete with state funding.

Q. Federal funding is for a 15 mile section near Pohakuloa?

A. Allocation of \$2.3M for environmental studies for the whole section plus pre-design, with commitment towards construction by DAR for the 15 mile section of PTA. Other funding mechanisms being studied.

Q. If the state commits to the project and the military pulls out, then that big chunk is not available?

A. Yes.

Q. What is the comparable distance (on the different alternate routes) from Iliio to Kona on Saddle Rd. compared with going around through Waimea?

A. On the existing route, to Kona on Mamalahoa, 86 miles, at alternate 2, the Waikoloa terminus, 79 miles, on alternate 3, Puuanahulu, 74 miles and the last alternate (SRTF), 72 miles. These figures do not take elevation into account.

Q. And the distance on the Hamakua road?

A. 93 miles.



improve existing road to overcome native species problems; also, more economical.

A. Noted.

Q. Is there a no-build option?  
A. Yes.

Q. The road is not safe. We pay federal taxes. Where is it spent on this island? We pay \$100/200 per year into fuel taxes.  
A. It will have to be a consensus process.

Q. Concerned about the north coast. Many people there are dependent on the sugar industry for their living. One of the last threads of hope is a cross island corridor for economic stimulation. Will the EIS address the impact (of the road) on this community?  
A. It will be addressed as an overall secondary impact.

Q. Category of impact on Waimea secondary also?  
A. From a traffic standpoint, yes. Economics will be addressed in terms of secondary impact.

Q. Terrminus in Hilo still in Kaunana area?  
A. South of Wilder Rd. There are several alternates at that section because of the weaving of the road. Need suggestions.

Q. Regarding the Kawahae road and Bypass mud lane, from Waimea to Kawahae, 90 percent military traffic does come from Kawahae?  
A. Correct.

Q. Tank road behind Waimea in pasture - any need for anything else over there?  
A. Currently use Kawahae to the south - preferred route. During out years, development will increase on Waikoloa Rd. increasing safety hazard due to projected population growth in 50 years.

Q. Waikoloa Land Co. - regarding concept of 90 percent primary purpose service to PTA, your study oriented to the wrong side. You need to study Kawahae to Pohakuloa as primary purpose. Assess different routes to PTA. Need analysis of Kawahae Bypass with/without impacts on Waikoloa Rd. as the only private road. It is not 50 years before development takes place on both sides. Include in your study Kawahae to PTA.  
A. Noted.

Q. The purpose of the funding is mitigating the public impact on the military?  
A. For mitigating the impact of military traffic on the public.

Q. Hilo to Kona truck traffic impacts on Waimea presently - what are changes to trucks using the (improved) saddle road? Would the grade be between 6 and 8 percent?  
A. We anticipate a maximum grade of 8 percent. We need to understand the impact of types of use - unable to predict future use at this time.

Q. Current grades greater than 8 percent?  
A. 10/12, sometimes more than that.

Q. Is it likely that trucks will be using the road?  
A. Yes, possible, but need couch in terms of the question. The direction saddle Road will take will have to be studied first.

Q. Clarify routes - labeling on maps.  
A. Existing road is outlined in red. The others in black; not all numbered, only alternate 1 through 4.

Q. Semi private land - to me, Saddle Road is from here (Waimea) to PTA. 90 percent of military traffic, from Hilo to PTA. Waikoloa junction - why leave state land to go through private land - Parker Ranch?  
A. It is not drawn in but it does exist.

Q. That is a power line?  
A. An existing electrical line corridor.

Q. You don't want to go through private property. I don't think Parker Ranch would like that.  
A. That is a concern, noted.

Q. (From a conservationist standpoint - recommend -) Do existing roads, maybe an extra lane for military traffic. Get the road straight. Puhonohono is the road there would be trees: fire hazard. lot of only game management area road there would be an extra lane - good for fires there. Support redefining present road with through the back of the state park (Alt. 4?) construction industry. As far as going through the back of the state park (Alt. 4?) would impact on the endangered species act, please (res:ve).

Q. Waipi concern on informational disturbance of public concerns during scoping?  
A. We are taking notes. All concerns raised will be looked at.

Q. So who is going to look at it and when will they be available to public?  
A. Within six months. Design (including socio-economic, cultural and other) problems of different alignments will have to be addressed.

Q. The EIS should consider economics. For the future of diversified economy, Pohakuloa (and Saddle Rd.) would be great if it is safe. Ideally keep and

Q. Recommend EIS consider impact on existing road. Lot more improvement made than building alternates. Question of spending public money on alignments through habitat areas.  
A. Noted.

Q. 5 MM is how far from Hilo Harbor?

A. Less than 7 miles.

Q. Kawaihae to western terminus?

A. Depends on final selection; will be noted in all considerations of alternates.

Q. Do not understand Eastern weighting. Would like to see impacts of improvement on West side. Saddle Road improvement inextricably linked to Kawaihae Mud Lane, not Hilo. May turn out to be an either/or situation. Why southern weighting for western terminus? Look at all scenarios and use that criteria for final report.

A. The military does use the road from Kaiwahaie to PTA. However

project/DAR funds is for PTA itself. In order to do that the EIS has to look at both termini, from Hilo to Mamalahoa Hwy.

Q. 300 percent increase of use of Saddle Road, projected 1,000 percent increase in the next 10 years, are there similar figures for Waimea?  
A. 1986 study, no update since.

Q. Will they be included in EIS?

A. Yes.

Q. If traffic is west of Pohakuloa, why fund Hilo to PTA?

A. Data shows most accidents occur 10/20 miles out of Hilo; "whole road" concept.

Q. Public record shows many accident at the 49 MM, below Waikii. Check police reports.

A. Studies of accident reports to be done.

Q. The problem with the existing road is that it is a one-lane road on which people travel 40/50 mph.

A. Traffic and speed studies will be done.

Q. I don't go from Kawaihae to Pohakuloa. I go from Kona to Hilo and back again, use both sides. The road needs improvement on the west and east sides.  
A. Noted.

Q. Why are improvements done only on the east side?

Q. We need to improve Saddle Road.

A. Noted.

Q. Runaway ramps should be included.

A. Noted.

Q. Gradient at Waikii, over 12 percent?

A. Analysis not done yet. Grades will be studied for all alternates.

Q. If funding linked to military impacts, EIS better document military, not east vs. west, so as not to jeopardize funding.

A. Noted.

Q. Western impact greater than eastern. If EIS addresses that it give a strong foundation for sure. (Further discussion east vs. west.)

Q. Why is military traffic from Kawaihae rather than Hilo?

A. Kawaihae has good set-up, topography - LSA - large ship harbor with ramp. Decided on a long time ago because it was less populated at the time.

Q. Your objectives include breakdown on rate of increase in traffic?

A. We have classification count; will show those.

Q. Ideas here, though not homeruns, may be spark for better ideas. (Waikii concern on information disbursement.)

A. We are starting a long process. If we go fast, nothing gets done. Government's bottom line is consensus. Due to logistics on amount of information it is necessary to get to conclusions with a smaller group. Eliminate some alignments because of unfeasibility due to terrain. Other alignments more difficult to decide. How? By people involved, including the task force, an important point of contact. In the meantime Okahara offices are open, one of the best way to get questions answered, concerns addressed. Also, results of scoping will be in newsletters; sign up sheet at registration desk; urge your continuing interest.

Q. Will there be other community opportunities in hearing ideas and results?

A. This is the last scoping but other public hearings will be held.

Q. How many?

A. Not yet scheduled. The next phase involves study, not much activity for approximately one year.

Q. What is your anticipation?

A. Definitely one more series, maybe two. Twice per year would be good.

Q. What year does construction begin?  
A. 1998.

Q. Since the project begins in 1998, is there possibility of making the road temporarily safe by federal funds?  
A. Not sure about federal funding, maybe county.

Q. County involved possibly before 1998?  
A. County is involved, part of the team of this project. In terms of what can be done now, that can be answered by the county.

Q. Toll booth at each end to pay for it?  
A. Noted.

Q. (Homestead owner) Support new highway. However one alternate, which depend on the owner, the makai road, (Waikoloa Road). We don't have to climb hills with loads of cattle. We don't want to see accidents or kill our animals. Save money in many ways. If military moves out, what is the state going to do with the land?

Q. Several years ago there was a Citizens Advisory Committee which met with state and county taking a look at all kinds of considerations. Do you have that?  
A. Yes, Comprehensive Transportation Plan.

Q. Clarify the extended military involvement - funding the 15 mile section for PTA. Yet discussions are on impact on public. PTA goes to Kawaihae. Is it your understanding 20 percent of this project funded by federal government, 80 percent state and county?

A. Federal laws govern DAR funding. There are a number of criteria which have to be addressed regarding PTA - justification - sudden or unusual defense generated impact such as doubling of traffic. It was determined that doubling did not occur on other segments. State expected to make fair share of improvements.

Q. State no longer develops resort roads, expect similar with federal government. In terms of doubling, is it just for extended training exercise and not national emergencies?

A. Yes. Determination made in original study. Ongoing commitment by state to take over improvement of Saddle Road.

Q. Roads through Hawaiian Homelands makai/mauka and PTA and behind camp, outside HHL area, lower east side, destruction of a lot of trees.

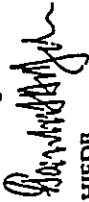
A. We recognize there are critical habitat areas. Mamane on the north side of park; no palia there but mamane tree is piliia habitat. Mauka - dry, fire hazard.

Q. Straightening increases hazard of road. #3/#4 alternate long-drawn-out process/expensive. Defeats its own purpose - still goes through PTA. Strongly advocate existing route. (Hawaiian standpoint.)  
A. Noted.

Q. Can you check the amounts of traffic, civilian vs. military. Impact of large trucks. County fixes and breaks again. Impact - double civilian traffic.  
A. Required in EIS.

Q. Recommend Big Island truckers/buses be on task force.  
A. Noted.

6. Adjourn.  
There being no further business the meeting adjourned at 9:00PM.

  
HIEDB  
Secretary

Saddle Road Task Force  
Summary of Written Comments  
Page No. 2

Date	Name	Organization	Key Issues and Concerns
6/2	William R. Halliday	Hawaii Speleological Society	<ul style="list-style-type: none"> <li>No caves or lava tubes should be altered in area with out study.</li> </ul>
5/17	Lysheth Lam	Waikii Ranch Resident	<ul style="list-style-type: none"> <li>Existing road is extremely hazardous. Cannot limit improvements to within PTA.</li> <li>Improve existing alignment now. Make major improvement at a later date; short term solution to safety is needed.</li> </ul>
5/17	Mike Luce	Waimea Com Assoc. Planning	<ul style="list-style-type: none"> <li>Western terminus of project should be Kawaihae.</li> </ul>
5/17	Kea McIrose	Waikoia	<ul style="list-style-type: none"> <li>Scope is inadequate in purpose is to accommodate military traffic. Need to consider traffic from Kawaihae harbor.</li> <li>Waikoia Road was not built with convey traffic in mind. Need for passing lanes, paved shoulders.</li> </ul>
5/14	Lloyd E. Case	Wildlife Conser. Assoc of Hi	<ul style="list-style-type: none"> <li>Improvement present alignment with separate lane for military.</li> </ul>
5/13	Leslie Agorastos	Waikii Ranch Resident	<ul style="list-style-type: none"> <li>Improve present alignment; it is cheaper than building a new road. Okay to realign around PTA.</li> <li>Waikii Ranch rep. should be on Task Force.</li> </ul>
5/12	Chris Agorastos	Waikii Ranch Resident	<ul style="list-style-type: none"> <li>Supports improvement of existing alignment; second choice is to follow Parker Ranch/State boundary.</li> </ul>
5/12	Robu Kanckuni	Safari Club Int-Hi Bow Hunters	<ul style="list-style-type: none"> <li>Improve existing alignment. New route will be more expensive.</li> <li>Protect wilderness areas at Puuanahulu</li> </ul>
5/12	Bill Kawahara	Self	<ul style="list-style-type: none"> <li>Support project to improve Saddle Road.</li> <li>Route should extend from Puhimako Street to Kiholo.</li> </ul>
5/11	Jack Davics	Hawaii Green Party	<ul style="list-style-type: none"> <li>PTA will close soon. Nice to have road, but rationale of military use is nonsense.</li> </ul>
5/11	Scott Sharpe	Peoples Advocacy for Trails Hi	<ul style="list-style-type: none"> <li>Make Saddle Road safe to shared use with bikes.</li> <li>Turn unused sections into bike route.</li> </ul>

Saddle Road Task Force  
Summary of Written Comments  
Page No. 2

5/10	William P. Kalawanzanu		<ul style="list-style-type: none"> <li>Claims family own portion of potential alignment</li> </ul>
5/10	Kyoji Narai		<ul style="list-style-type: none"> <li>Improve dangerous curves in eastern portion.</li> </ul>
5/9	Marcia A. Miller	Self	<ul style="list-style-type: none"> <li>Need for a more direct alignment to Kona</li> </ul>
5/7	David L. Bigelow	Waikii Ranch owner	<ul style="list-style-type: none"> <li>Improve as major highway.</li> </ul>
5/6	Hoaliku L. Drake	Department of Hwn Home Lands	<ul style="list-style-type: none"> <li>If portion of road alignment goes through DHHIL lands, prior approval of HHC is required.</li> </ul>
5/5	Margaret Donat	National Park Service	<ul style="list-style-type: none"> <li>Need for adequate species inventory.</li> <li>Need for archeological inventory of alignments.</li> <li>High speed road through PTA may not be acceptable. EIS should consider alternative corridors for realignment.</li> </ul>
5/5	Irene Ed Minor	Self	<ul style="list-style-type: none"> <li>Supports new highway.</li> </ul>
5/3	Michael G. Buck	DLNR-Forstry and Wildlife Div	<ul style="list-style-type: none"> <li>Relocation of road north of PTA will have severe impact on mamani-nano forest (Palila habitat.)</li> </ul>
4/25	Rod Burns	Waikii Ranch Resident	<ul style="list-style-type: none"> <li>Most dangerous portions of Saddle Road are from Waikii Ranch to Mamalahoa Highway.</li> <li>Until improvements are made, Saddle Road should be for local traffic only.</li> <li>Should include both short term and long term improvements.</li> <li>Realign existing road with terminus at Waikoia Road intersection.</li> </ul>
4/21	Ken McIrose	Waikoia Land Company	<ul style="list-style-type: none"> <li>EIS should analyze transport access to PTA from Kawaihae.</li> <li>Realignment should consider routes to PTA which minimize encroachments of private land.</li> <li>Residents of Waikoia should be consulted.</li> </ul>
4/20	Herman Aizawa	State Department of Education	<ul style="list-style-type: none"> <li>Concern with impact on Kaunana School.</li> </ul>
4/20	Jojo Tanimoto	Kawaihae HHHIL Com Assoc	<ul style="list-style-type: none"> <li>Route should encourage traffic to bypass Waihae.</li> </ul>
4/20	Esther Uyeda	State Land Use Commission	<ul style="list-style-type: none"> <li>Alignments will go through Conservation lands.</li> <li>Draft EIS should show land use district and tax map keys.</li> </ul>



**1.4.2 Chronological Correspondence and Notices, 1995**

<b>Correspondence From:</b>	<b>Correspondence To:</b>	<b>Date</b>
DLNR	Board of Land and Natural Resources	3-24-95
DLNR	Okahara & Associates, Inc.	6-2-95
USFWS	FHWA	10-19-95
RUST	Distribution List	10-24-95
DLNR	Okahara & Associates, Inc.	4-27-95
RUST	Distribution List	10-24-95
RUST	USFWS	11-17-95
USFWS	FHWA	1-9-92
DOA	RUST	11-29-95
State of Hawaii - Office of Environmental Quality Control	HDOT	12-7-95

RESULTS OF LAND BOARD MEETING

March 24, 1995

APR 3 1 19 PM '95

All Land Management Division items approved as submitted.
Item F-1-d..... Approved as amended. Amendment shall post within 60 days of the effective date of the assignment a liability insurance policy, coverage of \$300,000 per occurrence of incident and \$500,000 aggregate, and naming the State of Hawaii as co-insured.

Item F-1-f..... Added item; approved as submitted.

Item F-3..... Approved, as amended. Amendment: Governor's concurrence required for all executive order properties.

Item F-4..... Approved, as amended. Amendments:

1. Date of submittal changed from 3/10/95 to 3/24/95.

2. Condition B.1 revised: If there are 3 or less qualified bidders, a bidder shall be permitted to bid for 2 land licenses; however, if there are 4 or more qualified bidders, then no more than 1 license per bidder.

Item F-6..... Approved, as amended. Amendment: Delete Condition D.9.

Item F-9..... Approved, as amended. Amendment: Authorize the Chairperson to donate the houses to any State agency.

State of Hawaii
DEPARTMENT OF LAND AND NATURAL RESOURCES
Division of Land Management
Honolulu, Hawaii 96813

March 24, 1995

Board of Land and Natural Resources
State of Hawaii
Honolulu, Hawaii

Subject: Okahara and Associates, Inc., Engineering Sub-Consultants on Behalf of RUST Environment and Infrastructure, Consultant and Federal Highways Administration Request for Right-of-Entry to Government Lands on Island of Hawaii - Hawaii Defense Access Road, Saddle Road Project (A-AD-6(1)) HAWAII

By letters dated February 8, 1995 and February 16, 1995, Okahara and Associates, Inc., Engineering Sub-Consultants, on behalf of RUST Environment and Infrastructure, Consultant and the Federal Highways Administration (FHWA) has requested a right-of-entry to various government lands in conjunction with the Hawaii Defense Access Road, Saddle Road Project (A-AD-6(1)).

The consultants have provided the department with the following information:

Scope of Work to be Conducted Under the Right-of-Entry:

- 1. To perform horizontal and vertical control surveys and to conduct a topographic survey which determines the positions of the natural and artificial features within and adjacent to the proposed project. The information obtained from these surveys is needed for the design phase of the project development process.
2. To place centerlines and right-of-way stakes for the proposed project together with all reference ties, or to place bench marks and temporary aerial target panels which may lie beyond the corridor limits.
3. To conduct an environmental survey which includes a cultural resource survey, Hazardous Waste Survey (unexploded ordnance), Threatened/Endangered Species, Wildlife, Botany, Entomology, Malacology and Wetlands Survey.

Parcels affected and any encumbrances

Tax Map Key Is Zn Sec Pit Par	Lessee/Description	GL S-4484 RP S-6703
3 2 4 06 34	Unencumbered	
3 2 4 08 01	DOFAW - Forest Reserve	
3 2 4 08 04	Dora W. Carlsmith	
3 2 4 08 08	DOFAW - Forest Reserve	
3 2 4 08 17	Unencumbered	
3 2 4 08 36	Kona Queen Co.	
3 2 5 01 02	DOFAW - Forest Reserve	
3 2 5 01 06	DOFAW - Forest Reserve	
3 2 5 01 08	B.A. Klingshorn/HELCO	
3 2 5 02 01	Unencumbered	
3 2 5 02 12	Unencumbered	
3 2 5 02 14	Unencumbered	
3 2 5 03 20	Unencumbered	
3 2 5 03 21	Island Tropicals	
3 2 5 03 44	DWS	
3 2 5 03 80	Unencumbered	
3 2 5 03 94	Island Tropicals	
3 2 5 06 03	Unencumbered	
3 2 6 18 01	Alfred J. Nobriga	
3 2 6 18 04	DOFAW - Forest Reserve	
3 2 6 18 10	DOFAW - Forest Reserve	
3 2 6 18 12	DOFAW - Forest Reserve	
3 2 8 01 01	DOFAW - Forest Reserve	
3 3 8 01 13	Pohakuloa Training Area	
3 4 4 15 02	Richard Smart-Parker Ranch	
3 4 4 15 04	DOFAW - Hunting Grounds	
3 4 4 16 08	Pohakuloa Training Area	
3 4 4 16 01	Pohakuloa Training Area	
3 4 4 16 03	DOFAW	
3 4 4 16 05	Pohakuloa Training Area	
3 4 4 16 06	Pohakuloa Training Area	
3 4 4 16 07	Pohakuloa Training Area	
3 4 4 16 10	Pohakuloa Training Area/HELCO	
3 7 1 03 01	DOFAW - GMA	
3 7 1 04 01	F. Newell Bohmert(Puuwaaawa Ranch)	
3 7 1 04 08	Powers Apiaries	

RECOMMENDATION:

That the Board grant to the Federal Highways Administration (FHWA), RUST Environment and Infrastructure (RUST) - primary consultant/contractor, its sub-consultants and/or sub-contractors, a right-of-entry to the above listed government lands to conduct the necessary environmental studies, environmental surveys, preliminary engineering work, topographic survey, centerline and right-of-way staking, the placement of temporary aerial target panels, etc. for the preparation of a Conservation District Use Application and the preparation of a Draft Environmental Impact Statement for the Hawai'i Defense Access Road, Saddle Road Project, subject to the following terms and conditions:

1. The FHWA, RUST, its sub-consultants and/or sub-contractors shall obtain and submit to the Hawai'i District Land Office written concurrence to the right-of-entry from all of the above-listed lessees, permittees, holders of Executive Orders/Proclamations, etc. prior to entry onto the subject property.
2. The State of Hawai'i shall not be responsible for any loss, liability, claim or demand for property damage, personal injury, including but not limited to death, arising out of any act or omission of the FHWA in connection with the FHWA's use of the State of Hawai'i land granted by this right-of-entry.
3. RUST, its sub-consultants and/or sub-contractors, shall defend, indemnify and hold the State of Hawai'i, Department of Land and Natural Resources and all lessees, permittees, holders of executive orders/proclamations, etc. of the above-listed parcels, harmless from and against any loss, liability, claim or demand for property damage, personal injury and death arising out of any act or omission of RUST, its sub-consultants and/or sub-contractors, and/or its employees, and/or its agents under this approval, relating to or connected with the granting of this approval.
4. RUST, its sub-consultants and/or sub-contractors shall procure at its own cost and expense, and maintain during the entire period of this right-of-entry, from an insurance company or companies licensed to do business in the State of Hawai'i, a policy or policies of comprehensive public liability insurance, in an amount acceptable to the Chairperson, insuring the State of Hawai'i, and all lessees, permittees, holders of executive orders/proclamations, etc. of the above-listed parcels, against all claims for personal injury, death, and property damage; that said policy shall cover the entire right-of-entry area, including all improvements and grounds and all roadways or sidewalks on or adjacent to the said right-of-entry areas in the control or use of RUST. RUST shall furnish a like certificate upon each renewal of such policy, each such certificate to contain or be accompanied by an assurance of the insurer to notify the State of Hawai'i of any intention to cancel any such policy sixty (60) days prior to actual cancellation;

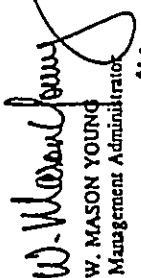


5. FHWA, RUST, its sub-consultants, and/or sub-contractors shall comply with all applicable statutes, ordinances, rules and regulations of the Federal, State and County of Hawai'i governments.
6. Prior to the clearing of any vegetation, the cutting of any trees and/or the disturbance of the ground in conjunction with the placement of temporary aerial target panels, the sites shall be physically reviewed by a professional archaeologist and a professional botanist to insure the absence of historical sites and/or threatened or endangered species.
7. With the exception of site clearing for aerial photography, FHWA, RUST, its sub-consultants, and/or sub-contractors shall refrain from cutting any trees while conducting their studies on the State land.
8. Any and all heavy equipment such as bulldozers, backhoes, drilling rigs, etc., shall be prohibited from entering onto the State land covered by this right-of-entry.
9. FHWA, RUST, its sub-consultants, and/or sub-contractors shall give the Hawai'i District Land Office and the Acting Hawai'i District Forestry and Wildlife Manager 48-hours' notice prior to the commencement of any work activity. Notification shall include the number of personnel entering the site, type of equipment, and the dates and times the personnel shall be on the site. Any additional entry would require re-notification.
10. FHWA, RUST, its sub-consultants and/or sub-contractors shall give the Camp Commander of the Pohakuloa Training Area, lessees and/or permittees of the above-listed parcels a minimum 48-hours notice prior to the commencement of any work activity. Notification shall include the number of personnel entering the site, type of equipment, and the dates and times the personnel shall be on the site. Any additional entry would require re-notification.
11. If any unanticipated sites or remains of historic or prehistoric interest such as shell, bone, charcoal deposits, human burials, rock or coral alignments, pavings, or walls are encountered while conducting any activity, FHWA, RUST, its sub-consultants, and/or sub-contractors shall stop work immediately and contact the State Historic Preservation Division in Honolulu at (808) 587-0047.
12. This right-of-entry is effective till June 30, 1996 or upon the completion of the studies, whichever occurs first.
13. Should any of the studies/surveys permitted under this right-of-entry discover the presence of any threatened/endangered species or habitat, any archaeological sites, burials, hazardous waste and/or any significant discovery on any of the above-listed parcels, the FHWA, RUST, its sub-consultant and/or sub-contractor shall provide to the

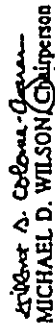
lessee, permittee, holder of the executive order or proclamation, or to the Land Management Administrator in the case of unencumbered lands, the pertinent portion of the studies/surveys which shall at the minimum identify the discovery, provide the location and remedial/preventative actions taken. A copy of all such studies/surveys shall be provided to the Chairperson.

14. That the issuance of this right-of-entry does not in any way express support for FHWA's proposed Saddle Road Project, nor does it imply that any other approvals and/or disposition of land is forthcoming.
15. Should FHWA, RUST, its sub-consultants and/or sub-contractors fail to comply with any of the terms and conditions of this right-of-entry, this right-of-entry shall be immediately cancelled.
16. The Department of Land and Natural Resources reserves the right to impose additional terms and conditions at any time if it deems it necessary.
17. Such other terms and conditions as may be prescribed by the Chairperson which are in the best interest of the State of Hawai'i.

Respectfully submitted,

  
W. MASON YOUNG  
Land Management Administrator

APPROVED FOR SUBMITTAL:

  
MICHAEL D. WILSON, Chairperson

Permitted  
File 3-12  
R/D File 2.6



DIRJAHN I. CAYLEMAN  
Governor of Hawaii

Chairperson  
MICHAEL D. WILSON  
Board of Land and Natural Resources

Deputy Director  
GILBERT COLONA-AGARAH  
Agriculture Development  
Aquatic Resources  
Biology and Ocean Recreation  
Bureau of Conveyances  
Conservation and Environmental Affairs  
Construction and Resources Enforcement  
Forestry and Wildlife  
Historic Preservation  
Land Management  
State Parks  
Water and Land Development

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

REF: OCEA: TES  
P. O. Box 611  
Honolulu, Hawaii 96809

FILE NO.: 95-433

JUN 2 1995

Mr. Donald Okahara, P.E., President  
Okahara & Associates, Inc.  
200 Kohola Street  
Hilo, Hawaii 96720

Dear Mr. Okahara:

SUBJECT: Permission to Conduct Various Environmental Studies and  
Survey Mapping for the Saddle Road Improvement Project,  
Island of Hawaii. TRK: various

We have reviewed the information for the proposed survey/mapping  
work transmitted by your letter dated March 20, 1995, and confirm  
that this work is considered basic data collection requiring only  
a Site Plan approval pursuant to Section 13-5-22(b)(1)(B), Hawaii  
Administrative Rules.

As such, we have no objections to the proposed activities:  
provided that the following conditions are observed in addition  
to those previously imposed by the Board of Land and Natural  
Resources under Agenda Item F-3, on March 24, 1995:

1. Because the occurrence of fires in the survey area is highly  
likely, all necessary precautions shall be taken by all  
smokers on the survey team(s). Cigarettes/Cigars shall be  
"field stripped" and matches be properly disposed;
2. All trash generated by the survey team(s) shall be removed  
from the survey site immediately after the survey is  
completed.

Should you have any questions, please feel free to contact Steve  
Tagawa of our Office of Conservation and Environmental Affairs at  
587-0377.

Aloha,

*Michael D. Wilson*  
MICHAEL D. WILSON

ST:tes

ENVIRONMENTAL ASSESSMENT

AND  
NOTICE OF PREPARATION OF AN  
ENVIRONMENTAL IMPACT STATEMENT

HAWAII STATE HIGHWAY 200  
SADDLE ROAD PROJECT  
HILO TO MAMALAOA HIGHWAY  
Project No. HHDAR A-AD-6(1)

PROPOSING AGENCIES

U.S. Department of Transportation  
Federal Highway Administration  
Central Federal Lands Highway Division

Contact: William Dird (HPD-16)  
Federal Highway Administration  
555 Zang Street  
Lakewood, Colorado 80228  
Telephone: (303) 969-5909

*Barry C. Smith*  
Barry C. Smith, P.E., Division Engineer

10/19/95  
Date

Department of Transportation  
State of Hawaii

Contact: Kenneth Y.K. Au, P.E.  
Advanced Planning Engineer  
State of Hawaii Dept. of Transportation  
Planning Branch, Highway Division  
600 Kapiolani Blvd., Room 301  
Honolulu, Hawaii 96813  
Telephone: (808) 587-1843

*Kazu Hayashida*  
Kazu Hayashida, Director

10/2/95  
Date

ACCEPTING AUTHORITY  
Office of the Governor  
State of Hawaii

ORIGINAL

CLASS OF ACTION

Use of State or County Lands or funds  
Use of Lands Classified as Conservation District by the State Land Use Commission

CONSULTANT CONTACT

James Anderson, Contract Manager  
RUST Environment & Infrastructure, Inc.  
5343 North 16th Street, Suite 400  
Phoenix, Arizona 85016  
Phone: (602) 279-3541

William L. Moore, Senior Planner  
Okahara & Associates, Inc.  
200 Kohola Street  
Hilo, Hawaii 96720  
Phone: (808) 961-5527



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
PACIFIC ISLANDS ECOREGION  
300 ALA MOANA BOULEVARD, ROOM 3108  
BOX 50088  
HONOLULU, HAWAII 96850  
PHONE: (808) 541-3441 FAX: (808) 541-3470

OCT 19 1995

FAXED

In Reply Refer To: MSS

Mr. Robert Nestel  
Federal Highway Administration  
Denver, Colorado

Dear Mr. Nestel:

Enclosed are copies of that portion of 50 CFR 402 and our section 7 handbook that address early consultation. If you request this process, the U.S. Fish and Wildlife Service (Service) is eager to undertake early consultation for the Saddle Road Realignment on the Island of Hawaii. We are forming a consultation team consisting of biologists from the Service, National Biological Service, and State of Hawaii. Our point of contact is Brooks Harper, Field Supervisor. Please feel free to contact him at 808/541-3441 or myself if you have any questions.

Sincerely,

Robert P. Smith  
Ecoregion Manager  
Pacific Islands

enclosures

Environmental Assessment &  
Notice of Preparation of an Environmental Impact Statement

CHAPTER 1  
AGENCIES CONSULTED

The following agencies were consulted during the preparation of the Environmental Assessment and Notice of Preparation of an Environmental Impact Statement.

1.1 Federal Agencies

- U.S. Army Pacific Command
- U.S. Army Support Command
- U.S. Army Corps of Engineers
- U.S. Fish & Wildlife Service
- U.S. National Biological Survey

1.2 State Agencies

- Department of Hawaiian Home Lands
- Institute of Astronomy
- Department of Land and Natural Resources-State Parks Division
- DLNR-Division of Forestry and Wildlife
- DLNR-State Historic Preservation Division
- DLNR-Division of Land Management

1.3 County Agencies

- Department of Public Works
- Planning Department
- Police Department

**RUST Rust Environment & Infrastructure Inc.**

Rust Environmental Company Phone 602 278 2541  
5311 North 16th Street, Suite 400 Fax 602 278 1234  
Phoenix, AZ 85018

October 24, 1995

**ADDRESSEES**

Re: HI A-AD-6(1), Saddle Road  
Rust E&I Project No. 87775

This is in reference to the Draft Environmental Impact Statement being prepared for the Federal Highway Administration (FHWA) Hawaii Defense Access Road Project A-AD-6(1), Saddle Road, on the Big Island of Hawaii.

A Social, Economic, and Environmental (SEE) Team meeting will be held on Friday, November 3, 1995, at 1 p.m. in Senator Daniel K. Inouye's office located in the Prince Kuhio Federal Building, Room 7325, 300 Ala Moana Boulevard, Honolulu, Hawaii. The Senator has graciously offered the use of his facilities for the SEE Team meeting which will follow the interagency meeting on Saddle Road being hosted by the Senator's office that morning.

Mr. William R. Bird, Environmental Planning Engineer, and Mr. Dave Gedeon, Design Project Manager, both in the Central Federal Lands Highway Division of the FHWA in Denver, Colorado serve as co-chairs of the SEE Study Team. Mr. Bird will chair the upcoming meeting. A copy of the meeting agenda is enclosed.

We appreciate your continued interest and cooperation on this project. Should you have questions or need additional information, Mr. Bird can be contacted by telephone at (303) 969-5909 or you may call Mr. Bill Moore, Okahara & Associates, in Hilo, Hawaii at (808) 961-5527.

Sincerely,

*James D. Anderson*  
James D. Anderson, P.E.  
Contract Manager

Encl: As noted

cc: Larry Smith, FHWA, CFLHD, Attn: Bill Bird (HFD-16), Denver, Colorado  
Jennifer Goto, Office of Senator Inouye, Honolulu, Hawaii  
Bill Moore, Okahara & Associates, Hilo, Hawaii

301111001000100

Saddle Road Project  
SEE Team Meeting - Honolulu  
Page Two.

**Addresses:**

Stanley Tamura, Acting Hawaii District Engineer  
Highways Division  
Hawaii Department of Transportation  
50 Makena Street  
Hilo, Hawaii 96720

Kenneth Y. K. Au  
Advance Planning Engineer  
Hawaii DOT - Highways Division  
600 Kapiolani Boulevard, No. 301  
Honolulu, HI 96813

Lt. Col. Ralph H. Graves, Commander  
U.S. Army Corps of Engineers  
Building 230  
 Ft. Shafter, HI 96858-5440

Col. Ronald Tucker, Director  
Plans, Training & Mobilization  
Attn: APVG-GT  
Building 580, Rm. 105  
U.S. Army Garrison, Hawaii  
Schofield Barracks, HI 96857

Donna Fay K. Kiyosaki, P.E.  
Chief Engineer  
Department of Public Works  
County of Hawaii  
25 Aupuni Street, Room 202  
Hilo, Hawaii 96720-4252

Lt. Col. Lloyd E. Mues, Commander  
HQ, PTA, USAG-III  
Bldg. T-180  
Milepost 36, H200 (Saddle Road)  
Hilo, HI 96720

Mr. Wayne Hamaguchi  
Chief, Planning Branch  
Attn: APEN-IP  
U.S. Army Pacific Command, Hawaii  
Building 104  
 Ft. Shafter, HI 96858-5100

Abe Wong  
Division Administrator (HDA-III)  
Federal Highway Administration  
P. O. Box 50206  
Honolulu, Hawaii 96850

Col. Dennis J. Fontana  
Director, Dept. of Public Works  
U.S. Army Garrison, Hawaii  
Building 300  
 Wheeler Army Air Field, HI 96854

Col. Owen D. Ryan, Commander  
HQ, U.S. Army Garrison, Hawaii  
Attn: APYG-GC  
Bldg. 580, Rm. 100  
Schofield Barracks, HI 96857-5000

Mr. Jeffrey R. Brooks  
Office of Program Development  
Federal Highway Administration  
211 Main Street, Room 1100  
San Francisco, CA 94105

Quality through teamwork

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GRINER  
LOHSEY  
KING  
FILE: FWHA 3000  
RID FILE 2.6



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF LAND MANAGEMENT  
P.O. BOX 518  
HONOLOULU, HAWAII 96809  
April 27, 1995

Mr. Masahiro Nishida, P.E.  
Okahara & Associates, Inc.  
Request for Right-of-Entry  
Hawaii's Defense Access Road  
Saddle Road Project ((A-AD-6(1))  
April 27, 1995  
Page 2

Should you have any questions, please call me at 933-4245.

Very truly yours,  
  
Giept Y. Tsuguchi  
Hawaii's District Land Agent

Mr. Masahiro Nishida, P.E.  
Okahara & Associates, Inc.  
200 Kohola Street  
Hilo, HI 96720

Dear Mr. Nishida:

Subject: Request for Right-of-Entry to Various Government Lands on the Island of Hawaii by Okahara & Associates, Inc., Engineering Subconsultants, on Behalf of RUST Environment and Infrastructure, Consultant, and the Federal Highways Administration (Hawaii's Defense Access Road - Saddle Road Project A-AD-6(1))

At its meeting of March 24, 1995, the Board of Land and Natural Resources under Agenda Item F-3, as amended, granted the Federal Highways Administration (FHWA), RUST Environment and Infrastructure (RUST) - primary consultant/contractor, its subconsultants, and/or its subcontractors, a right-of-entry for the purpose of conducting the necessary field work for the preparation of a conservation district use application and the preparation of a draft Environmental Impact Statement for the Hawaii's Defense Access Road, Saddle Road Project, subject to the terms and conditions as set forth in the enclosed copy of the Land Board submittal, along with the following amendment: "Governor's concurrence required for all Executive Order properties."

Should the FWHA concur with the terms and conditions of the Land Board submittal, please have them acknowledge and return a copy of this letter to this office. Any changes or amendments to the Board's terms and conditions shall require a resubmittal to the Board for its approval.

GYT:src  
Encls.

c: Hawaii's Land Board Member  
Land Management Administrator  
William L. Moore Planning

We concur with the terms and conditions of Land Board Agenda Item F-3, as amended, approved at its meeting of March 24, 1995.

We do not concur.

FEDERAL HIGHWAYS ADMINISTRATION

By   
Date 5/4/95

Hawaii DAR A-AD-6(1), Saddle Road  
SEE TEAM MEETING

November 3, 1995

AGENDA

- I. Introductions
  - A. SEE Team Members
  - B. Consultants
  - C. Guests and Observers
- II. Background
  - A. Prior SEE Team Minutes
  - B. Project Status and Activities
  - C. Environmental Studies Kickoff - November 6 at Hilo
- III. Purpose of this Meeting
  - A. Presentation of Saddle Road Alternative Alignments
  - B. Confirmation of Alignments for Further Review
  - C. Segments and Decisions for Manageable Comparison Routes
  - D. Coordination with Ecosystem Management Program
  - E. Coordination Requirements with Environmental Review
  - F. Project Development Schedule
- IV. Discussion Topics
- V. Adjourn

As appropriate

5.0775260V1.31

**RUST** Rust Environment & Infrastructure Inc.

A Rust International Company Phone 602 779 3541  
5301 North 166 Street, Suite 400 Fax 602 779 1324  
Phoenix, AZ 85018

October 24, 1995

ADDRESSEES

Re: HI A-AD-6(1), Saddle Road  
Rust E&I Project No. 87775

This is in reference to the development of the draft environmental impact statement (DEIS) presently underway by the Federal Highway Administration's (FHWA) Central Federal Lands Highway Division (CFLHD) covering proposed improvements to Hawaii SR 200, Saddle Road, on the Big Island of Hawaii. This effort is in cooperation with the Department of the Army, the Hawaii Department of Transportation (HDOT), and the County of Hawaii. The DEIS covers that portion of the Saddle Road extending from Milepost 6 in Hilo, westerly to SR 190, the Mamalahoa Highway. Rust E&I is the lead consultant directing the work for the FHWA.

An interagency meeting has been scheduled to provide an overview of the ongoing work, discuss potential resource issues, and explore opportunities for interfacing the various environmental studies with the Ecosystem Management Program being developed by the U.S. Army Garrison, Hawaii as it relates to the Big Island.

U.S. Senator Daniel Inouye's office has graciously offered to host this meeting. The meeting will be held on Friday, November 3, 1995, beginning at 10 a.m. in the Senator's offices located in the Prince Kuhio Federal Building, Room 7325, 300 Ala Moana Boulevard, Honolulu, Hawaii. You are cordially invited to attend and participate in this meeting. A copy of the meeting agenda is enclosed.

We look forward to meeting with you on November 3, 1995. If you have questions or need additional information, you may call Mr. Bill Moore, Okahara & Associates, in Hilo, Hawaii at (808) 961-5527.

Sincerely,

*James D. Anderson*  
James D. Anderson, P.E.  
Contract Manager

Encl: As noted

cc: Larry Smith, FHWA, CFLHD, Attn: Bill Bird (HPD-16), Denver, Colorado  
Jennifer Goto, Office of Senator Inouye, Honolulu, Hawaii  
Bill Moore, Okahara & Associates, Hilo, Hawaii

5.0775260V1.31

Quality through teamwork

**RUST** Rust Environment & Infrastructure Inc.

A Rust Environmental Company Phone 602 778 3341  
5343 North 116th Street, Suite 400 Fax 602 778 1104  
Phoenix, AZ 85018

October 24, 1995

**ADDRESSEES**

Re: HI A-AD-6(1), Saddle Road  
Rust E&I Project NO. 87775

This is in reference to the development of the draft environmental impact statement (DEIS) presently underway by the Federal Highway Administration's (FHWA) Central Federal Lands Highway Division (CFLHD) covering proposed improvements to Hawaii SR 200, Saddle Road, on the Big Island of Hawaii. This effort is in cooperation with the Department of the Army, the Hawaii Department of Transportation (HDOT), and the County of Hawaii. The DEIS covers that portion of the Saddle Road extending from Milepost 6 in Hilo, westerly to SR 190, the Mamalahoa Highway. Rust E&I is the lead consultant directing the work for the FHWA.

An interagency meeting will be held on Monday, November 6, 1995 at 11 a.m. in the Mala Ikona Room at the Hilo Hawaiian Hotel, 71 Banyon Drive, Hilo, Hawaii. The purpose of this meeting is to provide the local agencies with an update on project development activities, the alternative alignments to be studied, and a time line of projected progress. A copy of the meeting agenda is enclosed.

We look forward to meeting with you on November 6, 1995. If you have questions or need additional information, you may call Mr. Bill Moore, Okahara & Associates, in Hilo at (808) 961-5327.

Sincerely,

*James D. Anderson*

James D. Anderson, P.E.  
Contract Manager

Encl: As noted

cc: Larry Smith, FHWA, CFLHD, Attn: Bill Bird (HPD-16), Denver, Colorado  
Bill Moore, Okahara & Associates, Hilo, Hawaii

LSUTRFLA00D.J1

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Saddle Road Project  
Agency Meeting - Hilo  
Page Two

**Addresses:**

Howard Horuchi, Acting District Manager  
DLNR Division of Forestry and Wildlife  
State Office Building  
75 Apunui Street  
Hilo, Hawaii 96720

Stanley Tamura, Acting District Engineer  
Highways Division  
Hawaii Department of Transportation  
50 Makaala Street  
Hilo, Hawaii 96720

Donna Fay K. Kiyosaki, P.E.  
Chief Engineer  
Department of Public Works  
County of Hawaii  
25 Apunui Street, Room 202  
Hilo, Hawaii 96720-4252

James Jacobi, Station Manager  
National Biological Survey  
Hawaii Field Research Station  
P. O. Box 44  
Hawaii Volcanoes National Park, Hawaii 96718

Abe Wong  
Division Administrator (HDA-III)  
Federal Highway Administration  
P. O. Box 50206  
Honolulu, Hawaii 96850

Aaron Ucno  
Chief Sanitarian  
State Department of Health  
Hawaii District Office  
1582 Kanehameha Avenue  
Hilo, HI 96720

Sam Lee, Acting District Land Agent  
DLNR Division of Land Management  
Hawaii Land Management District Office  
State Office Building  
75 Apunui Street  
Hilo, Hawaii 96720

Charles K. Supe, State Parks Superintendent  
DLNR State Parks Division  
Hawaii Parks Section  
State Office Building  
75 Apunui Street  
Hilo, Hawaii 96720

Virginia Goldstein, Director  
Planning Department  
County of Hawaii  
25 Apunui Street  
Hilo, Hawaii 96720

Lt. Col. Lloyd E. Mues, Commander  
HQ, PTA, USAG-HI  
APO, AP 96556-0008

Marc Smith  
Hawaii Island Archeologist  
DLNR State Historic Preservation Division  
P. O. Box 936  
Hilo, HI 96721

James DuPont  
Wainea District Office  
Department of Hawaiian Home Lands  
P. O. Box 125  
Kamuela, HI 96743

Saddle Road Project  
Agency Meeting - Hilo  
Page Three

Addressess (continued):

Lt. Ernest Correia  
Traffic Services Section  
Hawaii County Police Department  
349 Kapiolani Street  
Hilo, HI 96720

Dr. Donald Hall, Director  
Institute of Astronomy  
University of Hawaii at Manoa  
2680 Woodlawn Drive  
Honolulu, HI 96822

Harry Kim, Administrator  
Hawaii County Civil Defense  
920 Ululani Street  
Hilo, HI 96720

Ron Kochler, General Manager  
Mauna Kea Observatories  
Support Services  
177 Makaala Street  
Hilo, HI 96720

DEFENSE ACCESS ROAD A-AD-6(1)  
Saddle Road (H 200)  
Environmental Kickoff Meeting

Mala Ikena Room - Hilo Hawaiian Hotel  
November 6, 1995  
9:00 a.m.

- I. Introductions
  - A. FHWA Personnel
  - B. Rust Team - Organization Chart
  - C. Subconsultants
- II. Project Overview
  - A. History of Project
  - B. Limits of Project
  - C. Activities to Date
  - D. Alternatives Being Studied - Filtering Process
  - E. Corridor Widths and Delineation
- III. Contractual Matters
  - A. Cost Plus Contract under FARs
  - B. Rust - Prime Contractor with FHWA
  - C. Subcontracts Executed
  - D. Notice to Proceed - November 4, 1995
  - E. Reporting Requirements - Forms
  - F. Invoicing Requirements - Forms - Payment
  - G. Scope Changes
- IV. Special Requirements
  - A. Unexploded Ordnance (UXO) Protection
  - B. DLNR Lands
  - C. Access
    1. Pohakuloa Training Area (PTA)
    2. State Land
    3. Private Property
  - D. Cooperation with EcoSystem Management Project Team
- V. Schedule
  - A. Mapping & Engineering - Completed by 1/31/96
  - B. Alignment & Corridor Staking - Completed by 12/31/95
  - C. Individual Studies - Subconsultants Provide Schedule ASAP
  - D. Target Date for Completion of ALL Studies - 10/31/96
  - E. Draft EIS to FHWA - 12/20/95
- VI. Future Meetings
  - A. Monthly Progress Meetings - First Week of Month
  - B. Public and/or Agency Meetings as Scheduled

ENCLOSURE 1



RUST ENVIRONMENTAL & INFRASTRUCTURE

NOV 22 1995

RECEIVED

BK 202- FILE: FHWA  
Record 25092  
RID 11

November 17, 1995

In Reply Refer To:  
HPD-16

Mr. Robert P. Smith  
Ecoregion Manager, Pacific Islands  
Fish and Wildlife Service  
300 Ala Moana Boulevard, Room 3108  
P.O. Box 50088  
Honolulu, HI 96850

Dear Mr. Smith:

As you are aware, the Federal Highway Administration (FHWA), in cooperation with the State of Hawaii, the County of Hawaii, and the U.S. Department of the Army, is preparing an environmental impact statement (EIS) for the proposed improvement of a portion of Hawaii State Highway (SH) 200, Saddle Road. The portion to be covered by the EIS begins in Hilo at approximately milepost 5 at the intersection with the proposed Puainako Street extension and proceeds westward approximately 48 miles to the junction with Hawaii SH 190, Mamalahoa Highway.

The proposed improvement will be a two-lane paved roadway with paved shoulders. The purpose of this proposal is to provide a safe, functional road by improving roadway geometrics and eliminating existing safety hazards, including conflicts between the traveling public and military training operations in the Pohakuloa Training Area (PTA).

Alternatives under consideration are shown on the enclosed maps. In the vicinity of the PTA, the alternative preferred by the military is shown in yellow on the Key Map and designated as PIA #1 and PIA #1A. Four alignment alternatives are being considered at the west end of the proposal (see the Saddle Road Project Map), but a preferred alternative in this area has not yet been selected.

Prior to the decision to prepare an EIS for this route, it was planned to prepare an environmental assessment for only that portion of the route passing through the PTA. Surveys for plants, birds, and mammals were performed, and a biological assessment was submitted to your office. Your response on March 8, 1991, stated that formal consultation would be required because the proposed action might affect the Palila.

2

In response to our notice of intent to prepare an EIS for the route, your office provided a new list on January 9, 1992, including the following species:

Palila (*Loxia bairdii*)  
Hawaiian goose (*Meochoen sandvicensis*)  
Hawaiian hawk (*Buteo solitarius*)  
Akiapohouae (*Hemiphysalis monroii*)  
Hawaiian hoary bat (*Lasiurus cinereus semotus*)  
Stenogyne angustifolia  
Haplostachya haplostachya var. angustifolia

New surveys are currently being conducted for the entire proposal and a biological assessment will be prepared based on the findings. As shown on the Palila habitat map, the PIA #1 alignment passes through designated Palila critical habitat.

In accordance with 50 CFR 402.11, we are requesting initiation of early consultation at this time. We realize that additional data will be needed during this process but hope that by starting now we can address some of the more sensitive issues in a more timely manner.

The point of contact for the FHWA is Mr. Robert Nestel, Environmental Biologist. He can be reached at 303-969-5911 or by writing to the above address, Attention: HPD-16, Environment.

Sincerely yours,

LARRY D HENRY }<sup>of</sup>

Larry C. Smith, P.E.  
Division Engineer

Enclosures

cc w/enclosures:

Mr. George A. Ruffner, Ph.D., EcoPlan Associates, Inc., 1845 S. Dobson Road, Suite 214, Mesa, AZ 85202

cc w/o enclosures:

Mr. Bill Bird, Environmental Planning Engineer, CFLHD  
Mr. Steve Hallisy, Environmental Protection Specialist, CFLHD  
Mr. Dave Gedeon, Design Project Manager, CFLHD

bcc w/o enclosures:

RLNestel:11/17/95:fwslcon  
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DEPARTMENT OF THE ARMY  
PACIFIC OCEAN DIVISION, CORPS OF ENGINEERS  
FORT SHAFTER, HAWAII 96855-5410

November 29, 1995  
RUST

DEC - 4 1995

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DEPT OF THE ARMY  
ATTENTION OF

Environmental Division  
Directorate of Engineering

James D. Anderson, P.E.  
c/o RUST

5343 North 16th Street, Suite 400  
Phoenix, Arizona 85016

Dear Mr. Anderson:

Thank you for your interest and comments on the Army's Ecosystem Management Program.

The Draft of the Ecosystem Management Plan is currently being prepared by the U.S. Army Corps of Engineers consultant, R.M. Towill Corporation. Submission of this document is expected in February 1996.

The Army has scheduled several surveys/inventories at Pohakuloa Training Area on the Island of Hawaii and is in the process of data collection. We would be pleased to work cooperatively with your office.

Please contact Ms. Beth Miura or Mr. Dean Nakasone at 438-1776 for further details/information regarding these projects.

Sincerely,

Ray H. Jo, P.E.  
Director of Engineering and Technical Services

File Log



January 9, 1992

New Dist

United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Pacific Islands Office  
P.O. Box 50167  
Honolulu, Hawaii 96850

William R. Bird  
Environmental Planning Engineer  
Federal Highway Administration  
P.O. Box 25246  
Denver, Colorado 80225

Dear Mr. Bird:

This responds to the December 2, 1991 Federal Register publication of your notice of intent to prepare an environmental impact statement (EIS) for the proposed alteration of a portion of Hawaii State Highway 200, Saddle Road. The highway is located in the vicinity of Pohakuloa on the Island of Hawaii.

William Kramer of this office attended your briefing on the project last February in Honolulu. Two reports, Biological Assessment of Birds and Mammals in Relation to a Proposed Improvement of Saddle Road by Dr. Leonard Freed and Pohakuloa Training Area Road Widening Project Botanical Survey Report by Dr. Evangeline Funk, were distributed at that time for our review. Both documents reference endangered species that either were observed during surveys conducted during the preparation of the reports or endangered species that can occasionally be found in that area of the Island. These endangered species are:

- Pallid (Loxioides bailleui)
- Hawaiian goose (Hesochen sandvicensis)
- Hawaiian hawk (Buteo solitarius)
- Akaiapolaau (Hemiathys monroii)
- Hawaiian hoary bat (Lasiurus cinereus semotus)
- Stenoxene augustifolia var. augustifolia
- Haplostachys haplostachya var. augustifolia

It is very possible that the project may affect some or all of these species. As such, consultation with the Fish and Wildlife Service as directed by section 7 of the Endangered Species Act will be required. Such consultation can be initiated with this office directly, and we look forward to working with you to eliminate or minimize any adverse impacts on listed species that may be generated by the construction or use of the roadway.

Thank you for the opportunity to comment on the proposed EIS.

Sincerely,  
Robert P. Smith

Robert P. Smith  
Field Supervisor

cc: BFA, (Peterson), FWS, Washington, D.C.

BOJANNA J. CAVITANO  
GOVERNOR



STATE OF HAWAII  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

24 SOUTH KING STREET  
FOURTH FLOOR  
HONOLULU, HAWAII 96813  
TELEPHONE 588-5800  
FACSIMILE 588-5800

RUST ENVIRONMENTAL  
INFRASTRUCTURE

DEC 11 1995

RECEIVED

December 7, 1995

Mr. Kazu Hayashida, Director  
Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097

Dear Mr. Hayashida,

Subject: Environmental Impact Statement Preparation Notice for  
the Hawaii State Highway 200-Saddle Road Project, Hilo  
to Mamalahoa Highway

Thank you for the opportunity to review the subject document. We  
have the following comments.

1. The Draft EIS must show the location of ceded lands on a map.
2. The Draft EIS must describe the impacts on access to the forest for gathering of plants for cultural purposes.
3. The increase in traffic will elevate noise levels. Are there any noise sensitive areas (eg., nesting or breeding areas) near the highway corridor? If so, what are the impacts on the noise sensitive areas?
4. The proposed highway project would increase the use of lands next to the roadway. The Draft EIS must analyze the extent of development with and without this project. Please also determine the significance of these impacts in relationship to current development trends and state/county land use plans.
5. Is this project expected to divert significant traffic from other routes? Would this diversion affect any local community from an economic standpoint? If so, what are the impacts?

FILE: FHW 99082  
R/p 2.8

COPY TO: EOP/PA  
DUNBAR  
MARTIN

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the lead. Everyone has already  
seen a copy - moved to  
Cavitate for*

Mr. Hayashida  
December 7, 1995  
Page 2

If you have any questions, please call Jeyan Thirugnanam at  
586-4185. Mahalo.

Sincerely,

*[Signature]*  
Gery Gill  
Director

c: William Bird, US DOT  
James Anderson, RUST

### 1.4.3 Chronological Correspondence and Notices, 1996

Correspondence from:	Correspondence To:	Date
FHWA	William Y. Kikuchi	1-24-96
United States Senate	FHWA	1-30-96
FHWA	US Army Engineering Division	3-19-96
FHWA	Distribution list	5-29-96
DOA	FHWA	6-28-96
DOH	FHWA	6-20-96
DHHL	FHWA	6-14-96
United States Senate	FHWA	6-6-96
PHRI	SHPD	8-5-96
Okahara & Associates, Inc.	Office of State Planning	9-11-96
FHWA	Distribution list	9-12-96
FHWA	Distribution list	9-13-96
FHWA	DLNR	9-17-96
USFWS	Okahara & Associates, Inc.	10-9-96
DLNR	PHRI (Wolforth)	10-9-96
IFA (University of Hawaii at Manoa)	FHWA	10-11-96
FHWA	DLNR Division of Land	10-25-96
United States Senate	Distribution list	11-18-96



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Highway District  
Highway Division

553 Zango Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

JAN 26 1996

RECEIVED

JAN 24 1996

In Reply Refer To:  
HPD-16

Mr. William Y. Kikuchi  
Field Representative  
Office of U.S. Senator Daniel K. Inouye  
101 Aupuni Street - Suite 205  
Hilo, Hawaii 96720

Dear Mr. Kikuchi:

Mr. William Moore of Okahara & Associates, Inc., recently informed of us your inquiry regarding the projected begin construction date shown in our project schedule for the Defense Access Road project, Hawaii A AD-6(1), Saddle Road. More specifically, whether the proposed start date could be accelerated ahead of the January 1, 1999, date shown in the most recent (November) schedule.

An examination of this schedule reveals that the right-of-way activity, which includes any needed appraisal and acquisition work, is delaying the project advertisement until October 1998 and hence the start of construction. However, we have proposed that the 14-mile Defense Access Road segment be divided into a series of two or three projects, rather than one large and costly undertaking. By doing so, the total cost of construction for each project would be held to a more reasonable limit, thus reducing the possibility that some or many Hawaii-based firms may be placed at a competitive disadvantage versus large scale mainland contractors. Under this scenario, we believe that a project with no or few right-of-way requirements could be put together and advertised as early as August 1998 with construction starting in October of that year.

A critical milestone will be the signing of the Record of Decision (ROD) by the Federal Highway Administration's regional office, a requirement before final design can commence. At this time, we anticipate the ROD will be signed in March 1998. Although this is an aggressive schedule for the preparation of an Environmental Impact Statement and final design for a major route with many potential environmental issues, we believe it can be achieved, providing these concerns can be resolved reasonably, the numerous agency reviews and approvals completed in a timely manner and that remaining funding needed to complete the project development process is in place when required.

We would like to thank you for your continued interest in and support for this important project for the State and County of Hawaii. The Federal Highway Administration and the many consultants working on this project are striving

to assure these scheduled dates are achieved and are continuously looking for ways to accelerate this schedule. If you have any other questions or if we can provide any additional information regarding the project schedule or other project matters, please do not hesitate to contact us.

Sincerely yours,

/s/ JAMES D. ROLLEN

Larry C. Smith, P.E.  
Division Engineer

cc: Ms. Jennifer Goto Sabas, Office of U.S. Senator Daniel K. Inouye  
Mr. Kazu Ilayashida, HDOT  
Mr. Hugh Ono, HDOT  
Mr. Kenneth Au, HDOT  
Ms. Donna Fay K. Kiyosaki, County of Hawaii  
Mr. Wayne Hamaguchi, USARPAC

bcc: Mr. Jim Anderson, RUST Environment & Infrastructure  
Mr. Don Okahara, Okahara & Associates, Inc.  
Mr. Charley Hiley, FHWA  
Mr. Abe Wong, FHWA  
Mr. Larry Smith, FHWA  
Mr. Jim ROLLER, FHWA  
Mr. Larry Henry, FHWA  
Mr. Dave Geddon, FHWA  
Mr. Bill Bird, FHWA

reading file

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FILE: FHWA 88082  
RID 1.1

*Bob McCarty*

Meeting Record

By: Bill Moore, Senior Planner  
Okahara & Associates, Inc.

Meeting with: See Attached List

Date: March 1, 1996

Robert Smith of the USE&WS called the meeting to present the preliminary findings of the Early Consultation requested by FHWA regarding the potential impact of the PTA alternative alignments on the palila critical habitat. This early consultation was initiated on November 21, 1995.

The process involves the development of a preliminary biological resource assessment of the palila and its habitat. While there may be other issues related to plants and invertebrates, the significant concern is the critical habitat and there this effort focused solely on this issue.

The biologists conducted a field trip of the area in early December and on December 14, 1995 held a meeting of all the scientists including representatives of USE&WS, NBS, USAGH and Reggie David.

Paul Banko of the National Biological Survey provided an overview of the issues concerning the palila and the potential mitigation plan. In summary:

- o 80% of the palila population is concentrated in a 3-4 square mile area on the western slopes of Mauna Kea.
- o The PTA Flats area is a potential habitat area, although there are no nesting palila in the area. The areas above the PTA Flats, however, holds the second largest concentration of nesting palila.
- o Palila rely on mamane trees for food and shelter. Because the trees flower and seed at the highest elevations and continue to the lower elevations, a significant elevation change is required to ensure that food sources are available for the young birds.
- o Because of the concentration of palila, the entire population is threatened by fire.

The major concerns with respect to the Saddle Road Alternatives through PTA include:

- o The realignment increases the risk of fire, both in the PTA Flats (eastern side) and along the western side of PTA. The current population concentration is directly mauka of this realignment.

- o The realignment through the eastern side of PTA increases the fire risk to the second largest population of palila in the mauka area.
- o The realignment potentially impacts the best relocation sites. This area is important because of the significant mamane forest and the large elevation differences with the area.
- o The Saddle Road improvements will increase traffic. This may introduce predators (cats, etc.) alien plants that compete with mamane, and increase the risk of fire.

While these concerns are significant, Paul indicated that the biologists felt that there were reasonable mitigation measures to address the concerns. There are four major areas of mitigation:

1. That the mamane forests within palila critical habitat in PTA no be made unsuitable for future restoration efforts.
2. That the threats of fire and alien organisms to palila habitat be minimized.
3. Areas for palila restoration be increased through habitat restoration and land acquisitions (lease, easement, or fee purchase).
4. That successful efforts are made to restore palila populations in at least two locations other than the existing population concentration.

Jacobi and Banko indicated they left these mitigation measures intentionally vague. They were intended to provide a discussion point to determine if this was feasible. If so, then the details and costs would have to be worked out. However, both indicated that if the mitigation measures are implemented, they felt that the palila would be better off. They would be confident in standing up to any legal challenge under the Endangered Species Act.

In discussing where do we go from here, Robert Smith indicated it is appropriate for USAGH and FHWA to prepare a list of questions related to the implementation and potential costs. At that point, the parties should sit down and discuss the viability of the mitigation plan and what can actually be accomplished. He indicated that any mitigation plan must be prudent and feasible according to the proposing agency.

**SADDLE ROAD REALIGNMENT MITIGATION FOR PALILA**

Despite the anticipated risks to the palila of realigning and improving the Saddle Road, it may be possible for military training to continue and the road to pass through Critical Habitat if four major conditions are met:

- 1) mamane forests within palila Critical Habitat in PTA are not made unsuitable for future palila restoration efforts,
- 2) threats of fire and alien organisms to palila habitat are minimized within PTA or elsewhere on the south and west slopes of Mauna Kea,
- 3) an area of former palila habitat at PTA is restored and managed for palila reintroduction; habitat elsewhere on Mauna Kea is enhanced for palila by securing land (lease, easement, or fee purchase) and promoting habitat restoration,
- 4) successful efforts are made to restore palila populations in at least two other locations on Mauna Kea and at PTA while enhancing the primary population on the west slope of Mauna Kea.

HONOLULU OFFICE OF  
U.S. SENATOR DANIEL K. INUYE

**SIGN-IN SHEET**

SUBJECT Saddle Road Project -- FWS Army Consult.

Date

3/1/96

Sheet 1 of 2

NAME	POSITION	AGENCY-ADDRESS	PHONE
Allen, Lew	U.S. Environmental W.	US Army Services, Hawaii	656-5301
Scott Henderson	Ch. of PTA Environ. Off.	Palila Training Area, HAZ	935-1525
M. C. ...	...	...	587-2166
Rick Adair	Biologist	National Biological Service	967-7396
MARGO SMITH	...	...	541-3441
Bill Moore	...	...	961-5527
Rand Kirk	...	...	656-3878
Paul Cliney	...	...	587-0166
Robert P. Smith	...	...	541-2749
Ronald Walker	...	...	541-2749
Brooks Harper	...	...	541-3441
George Stever	...	...	541-2972

RECEIVED AS FOLLOWS

HONOLULU OFFICE OF  
U.S. SENATOR JANIEL K. INOUE

SIGN-IN SHEET

SUBJECT SADDLE ROAD PROJECT - FWS EARLY CONSULT.

Date 3/1/96 Sheet 2 of 2

NAME	POSITION	AGENCY-ADDRESS	PHONE
Jim Jacobi	Retiree, Station Leader	NRS Hawaii Field Sta. <sup>Box 44</sup> <sup>Honolulu</sup> <sup>Post Office</sup>	967-7396
Paul Banks	Wildlife Biologist	"	"
Bill Kuchu	Sen. Inouye's Hilo	Office - 101 AUPULU ST. #205 Hilo 96720	935-0844
Michael Quirk	DNR-DOFAW	1151 Punaluu St. Honolulu, HI 96813	587-0166
Donald Okahara	OKAWAMA Assoc. consulting group	200 Kohala St Hilo, HI 96720	961-5527
HUGH ENO	Hawaii Highways Dept.	869 Kumuohonua St. Hono. 96813	587-2228
Ronald Tsuzuki	" " "	" " " " "	587-1830
Kenneth Au	" " "	" " " " "	587-1843
MAJ RICK KEARNEY	POD, Corps of Engineers	FORT SHAFTER, HI	438-1069
COL RONNIE "CANDY" TUCKER	DER PENS, TRNG, HQR, SEC	SCHAFFELD BARRACKS, HI	655-1973
COL Dennis Fontana	DPW, US Army Corps - HI	Schryfield Barracks	656-1289
RAYMOND McCORMICK	Field Operations Engineer FHWA - HAWAII DIVISION	FHWA - HAWAII	541-2699
JENNIFER GOTO	U.S. SEN INOUE	FED BLDG	541-2547
Alexis T. Inoue	U.S. Senator Inouye	Fed Bldg, Honolulu	541-2112



Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

March 19, 1996

In Reply Refer To:  
HPD-16

Mr. Charles Streck  
Senior Archeologist  
U.S. Army Engineering Division  
Pacific Ocean Division  
CEPOD-ET-ES, Building T-1  
Fort Shafter, HI 96858-5440

Dear Mr. Streck:

This to confirm your conversation on this date with Mr. Bert McCauley, Staff Environmental Engineer, regarding your interest in performing the Historical & Cultural Resource Study for the alternate alignments under consideration through the Pohakoua Training Area (PTA) on the Saddle Road Project. Enclosed is a copy of the Historic and Archeological Survey section of our contract with the prime contractor on this project. This section outlines the work needed on the PIA alternate routes so that we are consistent with the level of detail provided on the remainder of the corridors.

As you are probably aware, we are attempting to accelerate the schedule for this project. Currently, we believe we can meet a May 1997 date for distribution of the Draft Environmental Impact Statement (EIS) for review and comment. In order to do this, we would need to submit a final report to the State Historic Preservation Office (SHPO) no later than January 1, 1997.

Also enclosed is mapping that depicts the alternate alignments through the PIA for your use in conjunction with the work task outline and scheduling information in preparing a cost estimate. Mr. McCauley, Mr. Dave Gedeon, Design Project Manager, and Mr. Jim Rottler, Division Planning and Coordination Engineer will be in Hawaii during the first 2 weeks of April to pursue coordination of the project. They will be available to meet with you at your convenience to review your estimate of the study's cost, our schedule of work, and any necessary contractual arrangements.

If you have questions or need additional information, you may contact Mr. McCauley directly at (303) 969-5614. Thank you for your interest in helping to advance this project.

Sincerely yours,

/s/ JAMES D. ROLLEN

Larry C. Smith, P.E.  
Division Engineer

Enclosures

Disc: Environmental Design 4

Planning & Coordination reading file

yc: File - 11 6  
BMcCauley:bm:bp:3/19/96  
(L:\Environmental\HP\110061\Streck.1tr1)

AMC





U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

**MAY 29 1996**

In Reply Refer To:  
Environment, HPD-16

See Addressee List

The Federal Highway Administration (FHWA), through the Central Federal Lands Highway Division (CFLHD), and the Hawaii Department of Transportation (HDOT), in cooperation with the U.S. Department of Defense (DOD) are proposing to improve Hawaii State Route (SR) 200, Saddle Road, on and adjacent to the Pohakuloa Training Area (PTA). The proposed improvement begins in Hilo, at approximately milepost 6 (the intersection with the proposed Puainako street extension) and extends approximately 48 miles (77 kilometers) westward to a junction with the Mamalahoa Highway, Hawaii SR 190.

Funds allocated by the Military Traffic Management Command (MTMC) of the DOD are being used for planning of the segment of the proposed improvements within the PTA. These funds, as well as State funds, are also being used to conduct preliminary engineering studies and prepare an Environmental Impact Statement (EIS) for the route within the above limits in Hawaii County. Improvements outside of the PTA will be carried forward by the HDOT when the environmental planning effort is complete, and as State funds become available. Various alternative routes to the existing alignment are being considered at Kaunama, the PTA, and the western terminus of the roadway between the PTA and the Mamalahoa Highway. The purpose of this proposal is to provide a safe, functional road by improving roadway alignment and eliminating existing safety hazards, especially conflicts between the traveling public and military training operations in the PTA.

The CFLHD is preparing the EIS for the proposed highway improvements following the Council on Environmental Quality's (CEQ) "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA)" of November 29, 1978, 40 CFR, Parts 1500-1508. In accordance with 40 CFR 1501.6, CFLHD is requesting that your agency become a Cooperating Agency in the development of this project because of your jurisdiction by law or special expertise as noted on the attached Request List of Cooperating Agencies.

The Cooperating Agency concept is a team concept. By formally requesting that your agency become a Cooperating Agency for this project, CFLHD is requesting that your involvement be that of a review agency committed to helping us identify, early in the process, your concerns regarding the project's impact on your special area of expertise or jurisdiction by law. In view of the very real budget constraints and personnel reductions with which we are all faced, CFLHD is requesting your participation as a Cooperating Agency at a minimal level of review and input. We are not requesting personnel or other resource allocations for conducting environmental analyses or the preparation of EIS documents.

The views of Cooperating Agencies will be sought throughout all stages of the development of the EIS. This coordination and your input is intended to minimize your subsequent review efforts, and also assist CFLHD in identifying least impact alternative routes and designs and/or measures to minimize any adverse impacts which could possibly result from this highway improvement. Cooperating Agencies are asked to designate a single point of contact for their agency or departments under their direction.

We are currently conducting environmental analyses for the preparation of the EIS, based on previous inputs from a large number of agencies, and expect to have a good idea of most impacts, adverse or otherwise, by late September. We would like to meet with you at that time and informally discuss any findings, with our consultants present, to get your input regarding concerns and/or avoidance or mitigation measures. This will help us in assembling a responsive preliminary Draft EIS for your review in December 1996. After you have had a chance to review the preliminary draft, we would like to meet with you again in mid- to late-January 1997 to discuss any specific concerns that you might have about how we addressed your previous input in the document or the verbiage used. This approach is intended to provide a Draft EIS for public circulation and comment in May 1997 in which all agencies have had a hand and can support. Of course, we would appreciate having any general concerns you might have now transmitted to us as soon as possible so that we might have time to assess them prior to our meeting in September.

We hope you will accept our invitation to participate in this process. We look forward to your response, in any event, prior to June 21st. If you have any questions or need additional information, you may call Mr. Bert McCauley, Staff Environmental Engineer, at 303-969-5614 or address inquiries to the above address (Attention: Environmental Section, HPD-16).

Sincerely yours,

LARRY D. HENRY

Larry C. Smith, P.E.  
Division Engineer

Enclosures:  
Project Location Map  
40 CFR 1501.6 and 1508.5  
Request List of Cooperating Agencies

cc (w/attachments):  
Mr. William Y. Kikuchi  
Field Representative  
Office of U.S. Senator Daniel K. Inouye  
101 Apunani Street, Suite 205  
Hilo, HI 96720

Mr. Kazu Hayashida  
Director, Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813

Mr. Abraham Y. Wong  
Division Administrator (HAD-HI)  
Federal Highway Administration  
Box 50206  
Honolulu, HI 96850

Mr. Jim Anderson  
RUST Environment & Infrastructure  
5343 North 16th Street, Suite 400  
Phoenix, AZ 85016  
Okahara and Associates, Inc.  
Engineering Consultants  
73-5574 Maiau Street, Bay 6B  
Kailua-Kona, HI 96740

Ms. Julie A. Cirillo  
Regional Administrator (HRA-09)  
Federal Highway Administration  
201 Mission Street, Suite 2100  
San Francisco, CA 94105

bcc:  
BMcCauley  
JRoller  
DGedeon  
Reading file  
yc: file - HI 6  
BMcCauley:bm:bp:5/29/96(copagenc.ltr)

REQUEST LIST OF COOPERATING AGENCIES  
PROJECT A-AD-6(1), Saddle Road

AGENCY  
Lt. Col. Ralph H. Graves, Commander  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440  
Col. Owen D. Ryan, Commander  
HQ, U.S. Army Garrison, Hawaii  
Attn: APVG-6C  
Building 580, Room 100  
Schofield Barracks, HI 96857-5000

Mr. Wayne Hamaguchi, Chief  
Planning Branch  
U.S. Army Pacific Command, Hawaii  
Attn: APEW-1F  
Building 104  
Fort Shafter, HI 96858-5100

Mr. Robert P. Smith, Manager  
U.S. Fish & Wildlife Service  
P.O. Box 50088  
Honolulu, HI 96850

Ms. Claudia Missley, Director  
Advisory Council on Historic Preservation  
Western Office of Project Review  
730 Simms Street  
Golden, CO 80401

Mr. Michael Wilson, Director  
Department of Land & Natural Resources  
P.O. Box 621  
Honolulu, HI 96809

Mr. Kazu Hayashida, Director  
Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097

RELATIONSHIP

404/Wetlands

Landowner

Landowner

T&E Species / FNCA

Historical / Archaeology

Landowner/C.D. Permit

Co-lead



DEPARTMENT OF THE ARMY  
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII  
SCHOFIELD BARRACKS, HAWAII 96837-5000

June 28, 1996

PERVYTO  
ATTENTION OF

Office of the Commander

Hawaii County Department of Public Works Donna Fay K. Kiyosaki, P.E. Chief Engineer 25 Aupuni Street, Room 202 HI 10, HI 96720-4252	Public Services
Mr. Gary Gill, Director Hawaii Office of Environmental Quality Control 220 South King Street, Fourth Floor Honolulu, Hawaii 96813	State Approvals
Ms. Shirley Mattingly, Regional Director Federal Emergency Management Agency FEMA Region 9 Building 105 P.O. Box 29998 Presidio of San Francisco, CA 94129	Floodplains / NFIP
Mr. David Farrell, Chief Office of Federal Activity (E-3) U.S. Environmental Protection Agency 75 Hawthorne Street San Francisco, CA 94105	404/Hazmat/Air Quality
Ms. Linda Colburn, Administrator State Office of Hawaiian Affairs 711 Kapiolani Blvd., Suite 500 Honolulu, HI 96813	Traditional Cultural
Mr. Denis R. Lau, Branch Chief Clean Water Branch Environmental Management Division State Department of Health 919 Ala Moana Blvd., Room 301 Honolulu, HI 96814	Clean Water / 401 Cert.
Mr. Kall Watson, Chairman Hawaiian Homes Commission P.O. Box 1879 Honolulu, HI 96805	Landowner
Dr. William Steiner, Director National Biological Service-PISC University of Hawaii Kilmore Hall, Room 406 3050 Maile Way Honolulu, HI 96822	T & E Species
Dr. Gregory G.Y. Pai, Phd., Director Office of State Planning Office of the Governor State Capitol P.O. Box 3540 Honolulu, HI 96811-3540 Attention: Coastal Zone Management	CZM Plan

Mr. Larry C. Smith, P.E.  
Division Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
P.O. Box 25246  
Denver, CO 80225-0246

Dear Mr. Smith:

This letter is in response to your letter dated May 29, 1996 regarding the proposed project to improve Hawaii State Route (SR) 200, Saddle Road, on and adjacent to the Pohakuloa Training Area.

I accept your offer that the U.S. Army Garrison, Hawaii be a cooperating agency in the development of the Environmental Impact Statement (EIS) for this project. My prime point of contact for this project is LTC Lloyd Mues, Pohakuloa Training Area (PTA) Community Commander, (808) 538-3501, with Dr. Raimo A. Lilius, Chief, Environmental Department, Directorate of Public Works, (808) 656-3501 as alternate.

Sincerely,

O. Ryan  
Colonel, U.S. Army  
Commanding Officer

Copies Furnished:  
Directorate of Plans, Training, Mobilization and Security  
Staff Judge Advocate  
Commander, 25th Infantry Division (Light) and U.S. Army, Hawaii



DANIEL K. INOUE  
HAWAII

APPROPRIATIONS  
Subcommittee on Defense

OFFICE OF THE CLERK  
U.S. HOUSE OF REPRESENTATIVES  
1000 OAKLEY BUILDING  
WASHINGTON, DC 20540-5400

COMMITTEE ON BUDGET AND FISCAL AFFAIRS

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COMMITTEE ON BUDGET AND FISCAL AFFAIRS

United States Senate

SUITE 772, HART SENATE OFFICE BUILDING

WASHINGTON, DC 20510-1102

(202) 224-3934

FAX (202) 224-5717

FRANCE ELMO FEDERAL BUILDING

ROOM 1775, 300 ALA MOANA BOULEVARD

HONOLULU, HI 96850-1815

(808) 541-7411

FAX (808) 541-7519

181 ALPINE STREET, INC. 705

HONOLULU, HI 96813

FAX (808) 981-9100

June 6, 1996

Mr. Larry C. Smith, P.E.  
Division Engineer  
Central Federal Lands  
Highway Division  
Federal Highway Administration  
P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Smith:

I would like to acknowledge receipt of your May 29, 1996 letter and enclosures inviting cooperating agencies to participate in the Saddle Road Project. Thank you for keeping me informed on your progress.

Aloha,

*William Kikuchi*

WILLIAM KIKUCHI  
Field Representative

WK:aem

PHRI

Pzui H. Rosendahl, Ph.D., Inc.

Archaeological - Historical - Cultural Resource Management Studies & Services

1111 Kalia Avenue - Suite 1000 - Honolulu 96813 - FAX (808) 951-0910

P.O. Box 31181 - O.H.A. - Honolulu 96811 - (808) 951-1117 - FAX (808) 951-3131

95-15221

5 August 1996

Dr. Don Hibbard, Administrator  
State Historic Preservation Division  
33 South King Street, 6th Floor  
Honolulu, HI 96813

Subject: PHRI Project 15221  
Archaeological/Inventory Survey Saddle Road

Dear Dr. Hibbard:

PHRI is currently assessing several corridors for the proposed Saddle Road expansion project (Attachment 1). The study corridor is 100 feet (30 m) from both sides of the centerline (for a total width of 60 m). A typical corridor plan map is enclosed (Attachment 2). In this letter, we provide a description of the Area of Potential Effect (APE), and request concurrence with the proposed APE from your office. We are also requesting information concerning a previous archaeological study within the current project area.

Based on our field inspection of a large portion of the project area with Dr. McCoy and Mr. Smith on 1 April 1996, and a subsequent phone conversation including Dr. Rosendahl, Dr. Langley, Dr. Cordy and myself, we are proceeding with the understanding that the APE for archaeological sites is the 200 foot (60 m) wide road corridor, but that assessment of potential effect on known burials (a traditional cultural property) will extend up to 700 feet from the centerline (400 feet [120 m] total width), because of the need for a buffer between the burials and the potential project impacts.

In addition to burials, several ritual sites are described by informant Henry Aunias in the general area. Those sites are not in use at present, but they are still considered important by Native Hawaiians, and ritual use could conceivably be revived. As discussed in a phone conversation between Mr. McDermott and Dr. Langley (29 July 1996), we propose a wider APE for these ritual sites. Ritual activities at the sites could be disturbed by the potential impact of road traffic. Potential impact would extend further in the open terrain that exists in the Saddle Road area and along the corridors to the west of the Pohukoa Training Area (PTA), and less far in the forested terrain along the corridors to the east of PTA. Consequently, we propose that assessment for ritual sites extend to 500 feet from the centerline in forested terrain (1000 feet [300 m] total width), and to 172 miles from the centerline in open terrain (1 mile [1.6 km] total width).

One of the project corridors has been previously surveyed and assessed (Welch 1993). What is the status of the regulatory review of the Welch (1993) report? What are the ramifications of the status of the Welch (1993) review on the current corridor assessment? Our work within the previously-surveyed corridor will be limited to relocating the sites to assess their current integrity. Any additional work within the previously-evaluated corridor will be based on the resolution of the following issues.

Welch (1993) did not record or map the numerous military sites within the corridor. Do the 20th century military features within the area previously assessed by Welch (1993) need to be recorded? We are not certain at this time, but Site 14638 may be within the proposed study corridor for our upcoming fieldwork. Welch (1993) recommended that further work was needed at Site 14638 in order to be able to make an evaluation of the significance of that site. Does DLNR concur with this recommendation? If so, is the proposed additional survey strategy (Welch 1993: 86) appropriate and adequate?

Thank you for your attention to these matters. We look forward to your reply.

Sincerely,

*Thomas R. Waldorf*

Thomas R. Waldorf  
PHRI Project Manager - Hawaii

wks  
cc: J. Anderson, MUST EAI w/out enc.



September 11, 1996  
Letter No. 45366  
Reference No. 96021

Office of State Planning  
Office of the Governor  
P. O. Box 3540  
Honolulu, Hawaii 96811-3540

Attention: John Nakagawa, Hawaii CZM Manager

Dear Mr. Nakagawa:

**SUBJECT: HAWAII STATE HIGHWAY 200-SADDLE ROAD PROJECT  
HILO TO MAMALAHOA HIGHWAY**

This is to confirm our conversation of September 9, 1996 regarding the Coastal Zone Management (CZM) Program requirements for the proposed improvements to Hawaii State Highway 200-Saddle Road, Hilo to Mamalahoa Highway, Hawaii Island. As the project will utilize federal funds, it is considered a federal activity and therefore requires coordination with respect to the State of Hawaii CZM program.

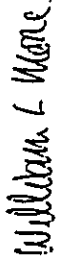
Based on this conversation it is our understanding that a CZM Program Assessment Form must be completed for the project and submitted to your office for review and determination of consistency with the Hawaii CZM Program. The information required for the assessment would be provided by the Draft Environmental Impact Statement (DEIS) which is in the process of being prepared. Accordingly, we will submit the Assessment Form to you once the DEIS has been completed.

In the meantime, we will keep you apprised of any potential issues and concerns that may arise during the preparation of the DEIS as it may affect your review as to the consistency of the project with the State's CZM Program.

September 11, 1996  
Letter No. 45366  
Reference No. 96021

Thank you for your cooperation and assistance on this matter. Please call me if you have any questions or if the above is not consistent with our conversation.

Sincerely,

  
William L. Moore  
Senior Planner

WLM:mq

cc: RUST Environmental and Infrastructure  
Federal Highways Administration--Central Lands Division  
Federal Highways Administration--Hawaii Division

David K. Okahara, P.E. • Honolulu, P.E. • Clarence Hoega, P.E. • Glenn S. Sudd, P.E. • Nancy E. Burns, P.E.  
200 KOOHOLA ST. • HILLO, HI 96720 • (808) 941-5357 • FAX (808) 941-5359

470 NORTH HAWAII HWY., STE. 212 • HONOLULU, HI 96817 • (808) 514-1724 • FAX (808) 531-3131  
73-5574 MAWU STREET, BAY 68 • KAILUA-KONA, HI 96740 • (808) 328-1721 • FAX (808) 328-1004

E-HAWAII



U.S. Department  
of Transportation  
Federal Highway  
Administration

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

**SEP 12 1996**  
In Reply Refer To:  
HPD-16, Environment

other and the project development staff on any further issues or regulatory requirements that need to be addressed. A copy of the agenda is enclosed for your reference. Mr. Bert McCauley, Staff Environmental Engineer, CFLHD, will chair the meeting.

We urge you to attend this meeting, as it is an opportunity for a preliminary review of the DEIS content prior to public distribution. We look forward to meeting with you on October 10. Should you have any questions or need additional information, Mr. McCauley can be contacted by telephone at (303) 969-5924, or you may contact Mr. Bill Moore, Okahara & Associates, in Hilo at (808) 961-5527.

Sincerely yours,

See Addressee List

The Federal Highway Administration (FHWA), through the Central Federal Lands Highway Division (CFLHD) and the Hawaii Department of Transportation (HDOT), in cooperation with the U.S. Department of Defense are proposing to improve Hawaii State Route (SR) 200, Saddle Road, on and adjacent to the Pohakuloa Training Area (PTA). The proposed improvement begins in Hilo, at approximately milepost 6 (the intersection with the proposed Puainako street extension) and extends approximately 48 miles (77 kilometers) westward to a junction with the Hamalaloha Highway, Hawaii State Route (SR) 190.

Funds allocated by the Military Traffic Management Command (MTMC) of the DOD are being used for planning of the segment of the proposed improvements within the PTA. These funds, as well as State funds, are also being used to conduct preliminary engineering studies and prepare an Environmental Impact Statement (EIS) for the route within the above limits in Hawaii County. The CFLHD is preparing the (EIS) for the proposed highway improvements following the Council on Environmental Quality's (CEQ) "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA)" of November 29, 1978, 40 CFR, Parts 1500-1508.

The CFLHD has contracted with RUST Environment & Infrastructure to prepare a Draft Environmental Impact Statement (DEIS) for the proposed Saddle Road Project. The Social, economic, and environmental inventories and studies are very close to completion. Upon completion, they will be incorporated into the DEIS; this document will then be distributed for public comment. Because of the scope and complexity of the project, the CFLHD will hold an interagency project review and coordination meeting to present project planning and design overviews and discuss the findings and results of inventories and studies to date. The meeting will be held on Thursday, October 10, 1996, beginning at 9 a.m., at the Hilo Hawaiian Hotel in Hilo. We ask that you, or a representative, attend this meeting.

The purpose of this meeting is three-fold: 1) to present information to you about the proposed project's development and schedule, and to discuss social, economic, and environmental study findings and how these findings will be presented in the DEIS, 2) to afford you the opportunity to comment on these findings and their manner of presentation in the DEIS, and 3) to provide an opportunity for all regulatory or affected agencies to coordinate with each

LARRY D. HENRY

Larry C. Smith, P.E.  
Division Engineer

Enclosures

bcc:  
Dave Gedeon  
Bill Bird  
Larry Henry  
Jim Roller  
Reading file

yc: file -III SR 200, Saddle Road  
C:\McCauley\bm:bp:9/11/96:\environment\sadroad\intragnc.ltr

Mr. Gary Gill, Director  
Hawaii Office of Environmental Quality Control  
220 South King Street, Fourth Floor  
Honolulu, Hawaii 96813

Ms. Linda Colburn, Administrator  
State Office of Hawaiian Affairs  
711 Kapiolani Blvd., Suite 500  
Honolulu, HI 96813

Mr. Denis R. Lau, Branch Chief  
Clean Water Branch  
Environmental Management Division  
State Department of Health  
919 Ala Moana Blvd., Room 301  
Honolulu, HI 96814

Mr. Kati Watson, Chairman  
Hawaiian Homes Commission  
P.O. Box 1879  
Honolulu, HI 96805

Ms. Virginia Goldstein, Director  
Hawaii County Planning Department  
25 Aupuni Street  
Hilo, Hawaii 96720

Mr. Wayne Carvalho, Chief  
Hawaii County Police Department  
349 Kapiolani Street  
Hilo, Hawaii 96720

Mr. Harry Kim, Administrator  
Hawaii County Civil Defense Agency  
920 Uluani Street  
Hilo, Hawaii 96720

Mr. Aaron Ueno, District Sanitarian  
State of Hawaii Department of Health  
1582 Kaiananole Avenue  
Hilo, Hawaii 96720

Dr. William Steiner, Director  
National Biological Service-PISC  
University of Hawaii  
Kilmore Hall, Room 406  
3050 Maile Way  
Honolulu, HI 96822

Mr. Kazu Hayashida, Director  
Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097

Haj. Gen. Alexis T. Lum (Ret.)  
Executive Assistant  
Office of U.S. Senator Daniel K. Inouye  
7325 Federal Building  
Honolulu, HI 96850

Mr. William Y. Kikuchi  
Field Representative  
Office of U.S. Senator Daniel K. Inouye  
101 Aupuni Street, Suite 205  
Hilo, HI 96720

Lt. Col. Ralph H. Graves, Commander  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

Col. Owen D. Ryan, Commander  
HQ, U.S. Army Garrison, Hawaii  
Attn: APVG-GC  
Building 580, Room 100  
Schofield Barracks, HI 96857-5000

Mr. Wayne Hamaguchi, Chief  
Planning Branch  
U.S. Army Pacific Command, Hawaii  
Attn: APEN-IF  
Building 104  
Fort Shafter, HI 96858-5100

Mr. Robert P. Smith, Manager  
U.S. Fish & Wildlife Service  
P.O. Box 50088  
Honolulu, HI 96850

Mr. Michael Wilson, Director  
Department of Land & Natural Resources  
P.O. Box 621  
Honolulu, HI 96809

Hawaii County Department of Public Works  
Donna Fay K. Kiyosaki, P.E.  
Chief Engineer  
25 Aupuni Street, Room 202  
Hilo, HI 96720-4252







U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

**SEP 13 1996**

In Reply Refer To:  
HPD-16, Environment

**Addressees**

As you know, the Central Federal Lands Highway Division (CFLHD) has contracted with RUST Environment & Infrastructure to prepare a Draft Environmental Impact Statement (DEIS) for the proposed Saddle Road Project. Social, economic, and environmental inventories and studies are very close to completion at this time. We are in the process of writing and assembling a Draft Environmental Impact Statement (DEIS) which will be made available for public comment in the near future. A project development schedule is enclosed for your reference.

At this point in the development of the project, it is important that we convene the Social, Economic, & Environmental (SEE) Team to discuss significant project development issues and seek your guidance on the selection of one or more preferred alternative route(s) from the various alternate routes studied. Accordingly, we have scheduled a SEE Team meeting for Wednesday, October 9, 1996, beginning at 1 p.m. at the Hilo Hawaiian Hotel in Hilo. Mr. Bert McCauley, Staff Environmental Engineer, CFLHD, will chair the meeting.

The primary purpose of the meeting will be to discuss the social, economic, and environmental inventory and study findings for each of the various alternative routes and examine the merits of each as a "preferred alternative" for presentation as such in the DEIS. Any recommendations or suggestions that you develop will be presented for discussion at the Interagency Review and Coordination Meeting and the Saddle Road Task Force Meeting on October 10th.

We appreciate your continued interest and cooperation on this project. If you have any questions or need additional information, you may contact Mr. Bert McCauley, Staff Environmental Engineer, at (303) 969-5924.

Sincerely yours,

**LARRY D. HENRY**

Larry C. Smith, P.E.  
Division Engineer

**Enclosures**

bcc:  
Bill Bird  
Dave Gedeon  
Jim Roller

Reading file

BMcCauley:ba:bp:9/12/96:1:\environment\sadroad\seemtg.ltr

Mr. Bruce McClure, Hawaii District Engineer  
Highways Division  
Hawaii Department of Transportation  
50 Makaala Street  
Hilo, Hawaii 96720

Mr. Jeffrey R. Brooks  
Office of Program Development  
Federal Highway Administration  
201 Mission Street, Room 2100  
San Francisco, CA 94105

Mr. Kenneth Y. K. Au  
Advance Planning Engineer  
Hawaii DOT - Highways Division  
600 Kapiolani Boulevard, No. 301  
Honolulu, HI 96813

Lt. Col. Ralph H. Graves, Commander

U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

Col. Owen D. Ryan, Commander  
HQ, U.S. Army Garrison, Hawaii  
Attn: APVG-GC  
Building 580, Room 100  
Schofield Barracks, HI 96857-5000

Mr. Wayne Hamaguchi, Chief  
Planning Branch  
U.S. Army Pacific Command, Hawaii  
Attn: APEN-IF  
Building 104  
Fort Shafter, HI 96858-5100

LTC Lloyd E. Mues, Commander  
HQ, PTA, USAG-HI  
Bldg T-180  
Milepost 36, H200 (Saddle Road)  
Hilo, Hawaii 96720

Col. Ronnie (Randy) Tucker, Director  
DPHSEC, U.S. Army Garrison Hawaii  
ATTN: APVG-GT  
Schofield Barracks, Hawaii 96857-5000

Col. Dennis Fontana, Director  
DPW, U.S. Army Garrison Hawaii  
Building 300  
Schofield Barracks, Hawaii 96857-5000

Mr. Abraham Y. Wong  
Division Administrator (HAD-HI)  
Federal Highway Administration  
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US Department  
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555 Zang Street  
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SEP 17 1996

In Reply Refer To:  
HPD-16, Environment

Mr. Dean Uchida  
Administrator  
Division of Land Management  
Department of Land and Natural Resources  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

Dear Mr. Uchida:

This is to confirm your meeting of August 7, 1996, with Mr. Bert McCauley of our staff and Mr. Bill Moore of Okahara & Associates, and to initiate formal discussion of land requirement issues as related to the mitigation planning efforts for Palila. As you are aware, the mitigation for this specie is an integral part of the Saddle Road Project for the segment through the Pohakaloa Training Area (PTA). Enclosed is a copy of the Environmental Assessment for this project as submitted to the Office of Environmental Quality Control for your reference.

Currently, we are anticipating having a Draft Environmental Impact Statement (DEIS) available for public distribution and comment in April 1997. As a result of the realignment through the PTA impacting critical habitat for the Palila, the mitigation plan for Palila will be an integral part of the DEIS. Under Section 7 of the Endangered Species Act, we hope to have a draft mitigation plan submitted to the U.S. Fish & Wildlife Service in December of this year and a preliminary Biological Opinion issued by them for inclusion in the DEIS.

The mitigation plan, as envisioned presently by the National Biological Service (NBS) includes, among other items, provisions for translocating Palila to lands on the north side of Mauna Kea near Pu'u Mali. According to the NBS, this is necessary in order to establish another viable population, in addition to the main population on the west side of Mauna Kea which will be at greater risk from human caused fires due to the increase in vehicles along an improved Saddle Road. Further, the translocation lands would need to be managed to continue to support this new Palila population. Presumably, this management would be provided by a State agency with funds provided through the U.S. Army's Ecosystem Management Plan for the PTA, while the lands would be made available through arrangements developed by the Division of Land Management. The nature of these arrangements, the processes required, and the timing and funding necessary to make the land available for this purpose are issues that require detailed coordination among all affected parties.

Enclosed is a copy of the Saddle Road Realignment Mitigation Plan for Palila as prepared by Mr. Paul Banko of NBS. We have requested Mr. Banko provide us with further descriptions of the mitigation plan requirements such as: 1) Palila

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United States Department of the Interior

FISH AND WILDLIFE SERVICE  
PACIFIC ISLANDS ECOREGION  
300 ALA MOANA BOULEVARD, ROOM 3108  
BOX 50088  
HONOLULU, HAWAII 96850  
PHONE: (808) 541-3441 FAX: (808) 541-3470

OCT. 17 1996

William, Moore, Senior Planner  
Okahara & Associates, Inc.  
73-5574 Maiuu Street, Day 6B  
Kailua-Kona, HI 96740

Bill

Dear Mr. Moore:

Based on our meeting of September 5, 1996, concerning the Saddle Road realignment mitigation for palia, you requested more detailed documentation and justification for securing and managing additional palia habitat in the Puu Maki and Puu Lanu areas of Mauna Kea, Hawaii. Additionally, you asked for written cost estimates for conducting palia restoration activities associated with the mitigation proposal. This letter is intended to address these questions and not reiterate the four major conditions that the Fish and Wildlife Service (Service) believes could offset Saddle Road realignment impacts to palia critical habitat and to the existing viable palia population on the west slope of Mauna Kea as outlined in a April 4, 1996, National Biological Service's report "Saddle Road Realignment Mitigation Plan for Palia".

Essential to the long-term survival of the species, additional populations of palia are necessary to offset the increased fire and alien species risks associated with the proposed road realignment. Additional palia populations also would insure against storms and other catastrophes depleting the highly concentrated primary population on Mauna Kea's west slope.

In order for palia populations to thrive, birds must move within forest areas that are adequately large and distributed along a wide range of elevation to enable them to utilize seasonally available food resources. Except on the west and south slopes, there are no protected habitats suitable for palia along the lower edge of Mauna Kea Forest Reserve (MKFR), particularly to or below 6500 ft. elevation. Palia have been disappearing from formerly occupied areas on Mauna Kea where the forest belt has become diminished and degraded. South slope birds also have become depleted, most likely due to predation and military activity rather than large-scale reduction of forest.

Immediate opportunities for rehabilitating palia populations anywhere within their historical range are limited because of severe, long-term habitat degradation. On the west slope of Mauna Loa, for example, some areas of mamane forest may have considerable potential for palia reintroduction, but cooperative agreements with private landowners are needed before habitat evaluation and management and palia restoration can proceed. The same is true of portions of former palia habitat on Hualalai. On Mauna Kea's east slope, rescue efforts to prevent the extinction of the dwindling palia population at Kanakaleonui should start soon as part of a comprehensive recovery effort.

translocation and pest, alien species, and fire control requirements and attendant assumptions and cost estimates; 2) scientific criteria used to justify the selection of the Puu Maki area as the most favorable translocation site; and 3) habitat criteria and standards for forest management without specifying land ownership or control methods.

Also enclosed is a map depicting critical habitat of endangered birds, a USGS 7.5-minute topographic quadrangle map showing the proposed translocation lands on the north side of Mauna Kea, and tax maps indicating the lands that have been identified by the NBS. Once we have received the additional information requested of Mr. Banko, we would like to continue discussions with you, or your staff, as to the processes required in attempting to provide the NBS land requirements for the Palia Mitigation.

We are anticipating a meeting during the week of November 18, 1996, at Senator Inouye's office to initiate coordination of the entire mitigation effort with all involved parties. Further information on this meeting will be forthcoming from the Senator's office. We look forward to meeting you at that time. If you require any further information, or have any questions after reviewing the enclosed material, you may contact Mr. Bert McCauley, Staff Environmental Engineer, at (303) 969-5924, or Mr. Bill Moore in Hilo, at (808) 961-5527.

Sincerely yours,

LARRY D. HENRY

Larry C. Smith, P.E.  
Division Engineer

Enclosures

cc: Mr. Mike Buck, Administrator, Division of Forestry & Wildlife  
Department of Land & Natural Resources, 1151 Punchbowl Street Honolulu, HI 96813  
Mr. Brooks Harper, U.S. Fish and Wildlife Service, P.O. Box 50088  
Honolulu, HI 96850  
Mr. Bill Moore, Okahara and Associates, Inc., 200 Kohola Street  
Hilo, HI 96720  
Hon. Gen. Alexis Lum (Ret.), Executive Assistant, Offices of U.S. Senator Daniel  
K. Inouye, 7325 Federal Building, Honolulu, HI 96850

bcc: Abraham Y. Hong, Division Administrator (HAD-HI)

Jim Rolter, FIRMA

Larry Henry, FIRMA

Dave Gedeon, FIRMA

Bert McCauley, FIRMA

Reading file

yc: file - HI SR 200 (Saddle Road)

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BN

However, cooperative agreements with DHIHL and many years of forest recovery and expansion are needed before palila restoration efforts can have meaningful effect there.

When considering all possible areas within the former range of palila for reintroduction and habitat management, only two sites seem suitable: 1) Kipuka Alala in western Pohakuloa Training Area (PTA), and 2) Puu Mali on the north slope of Mauna Kea. The initial area to be used for translocation activities, however, should have habitat suitable for reintroducing palila within the next 12 months.

The criteria for selecting this area are:

- 1) size and elevational range of mamane forest sufficient to allow palila to find food throughout the year;
- 2) density of mamane trees sufficient to provide adequate foraging, sheltering, and nesting sites;
- 3) age structure of mamane forest distributed to enable long-term forest perpetuation; the forest currently must include a large cohort of seedlings and saplings complementing a large cohort of medium to large trees; alternatively, ungulates and other factors limiting mamane regeneration must be quickly removed so that regeneration can proceed;
- 4) relatively consistent, large annual production of mamane seeds and flowers to ensure adequate breeding effort and survival within the palila population;
- 5) availability of suitable insect foods, particularly caterpillars;
- 6) predator populations that are currently low or that can be quickly and effectively reduced;
- 7) low incidence of avian diseases and vectors;
- 8) low incidence or potential for infestation by unmanageable alien weeds and pests;
- 9) low risk of wildfire; and
- 10) low risk of human disturbance.

Biological Resources Division (BRD) (formerly National Biological Service) is currently assessing conditions at Kipuka Alala (and Pohakuloa Flats within the Critical Habitat of PTA) and Puu Mali to determine which area is best suited for reintroduction of palila. Although final results will be reported in December 1996, it is not premature to suggest that Puu Mali will be determined to be the site where palila reintroduction first should proceed. First among the factors leading to the selection of Puu Mali is that the size of the forest (both existing and potential) is larger than at Kipuka Alala. Presently, the mamane forest extends substantially below MKFR on a rough 'a'a flow immediately

northeast of Puu Mali. The forest is regenerating naturally because cattle have not intruded onto the lava flow in recent years due to diapiadation of the water system. In addition, the condition and extent of the forest above Puu Mali should continue to improve rapidly now that browsing ungulates are being eliminated within MKFR. If forests between Puu Mali and Puu Lanu continue to recover from ungulate damage, there eventually may be a corridor of habitat within MKFR linking a new population on the north slope with the existing main population on the west slope. The Puu Mali area also receives substantially more rainfall than Kipuka Alala, consequently it is more suitable for rapid forest rehabilitation. In addition, the north slope of Mauna Kea has greater potential to provide the broad elevational band of forest and a moisture gradient necessary to provide palila with year-round food availability.

Puu Mali also ranks ahead of Kipuka Alala on the basis of the other criteria for selecting the first palila reintroduction site. In this regard, the density of medium to large mamane trees in palila Critical Habitat above Puu Mali is similar to portions of the Puu Lanu area where palila exist and nest in relatively high numbers. Mamane sapling recruitment above Puu Mali also is similar to Puu Lanu, whereas there is little mamane regeneration at Kipuka Alala because of severe ungulate browsing damage and more arid conditions. Greater rainfall at Puu Mali lowers the risk of fire, even during dry periods.

From previous research by BRD, we know that annual production of mamane flower and seed crops is likely to be consistently higher at Puu Mali than at Kipuka Alala. Greater mamane seed production suggests that important caterpillar foods, particularly *Cydia* sp., also will be more available. Finally, rat populations are expected to be smaller and more easily controlled at Puu Mali because *niao* is not abundant there, whereas rats are likely to be more abundant at Kipuka Alala because *niao* is very abundant there.

At this time, there seems to be no obvious differences between Puu Mali and Kipuka Alala in terms of threats from avian diseases, alien weeds and pests, ungulate presence, and human disturbance. Essential steps in reestablishing a second population of palila near Puu Mali are 1) securing and managing lands that are dedicated for palila recovery, and 2) removing factors, especially ungulates, that degrade palila habitat. The proposed palila restoration area in the Puu Mali area is all State land within and below MKFR, and it contains a combination of recovering mamane forest and native shrubland already within palila Critical Habitat in MKFR in addition to about 5000 acres below MKFR leased for grazing that includes a core of partially degraded mamane-akoko forest on a lightly grazed 'a'a flow and adjoining heavily grazed and degraded pasture. Habitat management in this combination of areas should allow a population of palila to be reestablished over a range of recovering habitat situated along suitably broad elevation and moisture gradients. A reintroduced population of birds in this site, while initially small, should expand with recovering habitat. No other site on Mauna Kea or elsewhere is better suited than Puu Mali for immediate reintroduction of palila.

Not knowing in advance how many palila can, in fact, be reestablished in this rehabilitating north slope forest, it is essential to provide at least as much habitat there as is currently occupied on the west slope, or an area of about 11 sq. miles. Less than half this area already exists within palila Critical Habitat above Puu Mali. To provide the remaining portion of necessary habitat, the minimum boundaries of the proposed north slope palila restoration site below MKFR, including the leased grazing lands to be secured and managed, are approximately: from near Puu Ulaula north 2 miles to 5000 ft. elevation, then west to Apakuie, then southwest to the lower base (6400 ft. elevation) of



the "APE" should be amended to accommodate these identified properties. When defining an "APE" you are dealing with "potential" effects but once the identification and evaluation phase is over, you are dealing with "actual" or known effects. We suggest that you not worry about amending or redefining the "APE" and that you simply justify, on a case by case basis, appropriate mitigation measures for any identified property that may be affected by the project.

The situation you discuss, that of historic properties being identified outside the "APE," will probably increase in frequency when traditional cultural properties are involved. The identification and evaluation of traditional cultural properties and some burial sites rely on interviews with knowledgeable individuals and these sites cannot be identified or assessed without this cultural knowledge. During the interview process, individuals rarely confine their comments and concerns to a narrowly defined project area. The nature of these properties, particularly ritual sites, can also require considering effects that are some distance from a given project area. As you state in your letter, assessing these effects will vary with the nature and significance of the property and the particulars of the terrain. These decisions will have to be made and justified for each property.

With regard to your question about the regulatory review status of the Welch report, the report was accepted by the National Park Service in 1993. Our office reviewed and commented on the first draft of that report. The SHPO's role in that project was advisory, so it was not our function to accept or reject the report. In terms of survey coverage of the road corridor, we believe that the Welch survey was adequate. With regard to Site 14638, we concur with Welch's recommendation for further work at this site and his proposed testing strategy.

Finally, as already indicated in phone conversations with both yourself and Jim Head we think that 20th century military features should not be recorded as historic sites unless you can document that they are 50 years or older. We have told you that we believe it is important to document the locations and primary characteristics of modern military sites, but that such information can be presented in an appendix using your temporary field numbers to identify each site.

If you have any questions, please call Pat McCoy (587-0006), or Holly McEldowney at (587-0008).

Aloha,

*Michael D. Wilson*  
MICHAEL D. WILSON, Chairman and  
State Historic Preservation Officer

HM:amk



# University of Hawaii at Manoa

Institute for Astronomy  
2680 Woodlawn Drive • Honolulu, Hawaii 96822  
Telex: 723-0459 • UHIAST HR

Office of the Director

October 11, 1996

Mr. Bert J. McCauley  
Federal Highway Administration  
555 Zang Street  
Lakewood CO 80228

Dear Mr. McCauley:

Subject: EIS for Saddle Road Project

This is a written follow-up to the remarks I made at the interagency meeting in Hilo on October 10, 1996. Two telescope projects at the Mauna Kea Observatories, Subaru and Gemini, are scheduled to transport oversize loads (30+ feet wide) from Kawaihine to the Mauna Kea summit beginning in late 1996 and continuing through the first half of 1998. If schedules slip, there may be large shipments in the second half of 1998 as well. Should construction begin in the Pohakuloa area in 1998, it could impact these shipments, and planning and coordination would be needed.

Thank you for including these considerations in the EIS planning process. Please feel free to call me at (808) 956-8768 if there are any questions.

Yours sincerely,

*Robert A. McLaren*  
Robert A. McLaren  
Associate Director  
Mauna Kea Division

RAM:sd  
P.O. Saddle Road



Central Federal Lands  
Highway Division

555 Zing Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

OCT 25 1996  
In Reply Refer To:  
HFD-16

Mr. Dean Uchida  
Administrator  
Division of Land Management Department  
of Natural Resources  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

Dear Mr. Uchida:

In our letter of September 17, 1996, transmitting Paila mitigation requirements for the Saddle Road project through the Pohakuloa Training Area, we indicated, through Mr. Bill Moore, that we had requested Mr. Paul Banko of the National Biological Service to furnish a written summation of the scientific basis for selection of the lands near Pu'u Mali for translocation efforts as part of the mitigation program. Accordingly, we are enclosing a copy of a letter to Mr. Moore from Mr. Brooks Harper, USFWS Field Supervisor, that provides this information.

The enclosed letter addresses requirements for long-term survival of the species, as well as specific criteria utilized to select locations for population restoration activities and the costs associated with these activities. Please note that this particular requirement of the mitigation package would apply only if the realignment alternative through critical habitat within the PTA was selected.

We are planning a meeting for November 21, 1996, to discuss the total mitigation package with all affected parties. Notification of this meeting will be forthcoming from Senator Inouye's office. We look forward to meeting you and discussing the issues in detail. In the interim, if you have any questions regarding the applicability of the enclosed information to the Saddle Road project, you may call Mr. Bert McCauley, Staff Environmental Engineer, FHWA, at 303-969-5924 or Mr. Bill Moore, Okahara & Associates, at 808-961-5527.

Sincerely yours,

/s/

Larry C. Smith, P.E.  
Division Engineer

Enclosure

cc: Mr. Mike Wilson, Director, Department of Land and Natural Resources, P.O. Box 621, Honolulu, HI 96809  
Mr. Mike Buck, Administrator, Department of Forestry and Wildlife, 1151 Punchbowl Street, Honolulu, HI 96813  
LTC Lloyd E. Mues, Commander, 110, PTA, USAG-III, Bldg. T-180, Hilepost 36, H200 (Saddle Road), HI 10, HI 96720  
Major General Alexis T. Lum (Ret.), Executive Assistant, Office of U.S. Senator Daniel K. Inouye, 7325 Federal Building, Honolulu, HI 96850

bcc: Dr. Raimo Litas, Director, DPM, U.S. Army Garrison Hawaii, Building 300, Schofield Barracks, HI 96857-5000  
Mr. Bill Moore, Okahara and Associates, Inc., 200 Kohola St., HI 10, HI 96720  
Mr. Dave Gedeon, Project Manager, CFLHD, Denver, CO  
Mr. Jim Roiler, Planning and Acquisition Engineer, CFLHD, Denver, CO  
Mr. Bert McCauley, Staff Environmental Engineer, CFLHD, Denver, CO  
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*Bill L. Moore w/ attachment & April 4, 1996 Report.*



DANIEL K. INOUE  
HAWAII

APPROPRIATIONS  
Subcommittee on Defense  
COMMERCE, SCIENCE AND TRANSPORTATION  
Subcommittee on Surface Transportation  
and Merchant Marine

COMMITTEE ON INDIAN AFFAIRS  
LEGISLATIVE STAFFING COMMITTEE  
COMMITTEE ON RULES AND ADMINISTRATION  
JOINT COMMITTEE ON PRINTING

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PHONE 841-1412  
FAX 808 941-1412

*Lent McCauley*

November 18, 1996

FIELD(name)  
FIELD(title)  
FIELD(company)  
FIELD(addr1)  
FIELD(addr2)  
FIELD(c/s/z)

Dear FIELD(who):

I am pleased to report that in the FY 1997 Department of Defense Appropriations Bill, the Congress provided \$1.5 million to continue the planning and design process for the Saddle Road improvement project on the Island of Hawaii. Additionally, Saddle Road environmental mitigation efforts were expressly referenced as an allowable use of a portion of the \$3 million Department of Defense Conservation program allotment for Hawaii.

At present, the Federal Highway Administration (FHWA) is proceeding with the development of an Environmental Impact Statement (EIS) to advance the Saddle Road Project. One of the main components of the EIS will be a mitigation plan designed to offset impacts to the Palila species as a result of the Saddle Road reconstruction within the Pohakuioa Training Area.

I understand that there have been ongoing informal discussions regarding Palila mitigation requirements between my staff, the U.S. Army, the FHWA and the State of Hawaii. These discussions have resulted in the formation of a conceptual agreement on the general elements of a Palila mitigation plan. However, in order to move the EIS and ultimate construction of the road forward in a timely manner, a Palila mitigation plan needs to be set forth in more specific terms. This would include a division of responsibilities, as well as a component, if necessary, to come to an agreement that is fiscally and environmentally sound and which maintains the integrity of the military training mission.

To this end, I am requesting your attendance, and that of your staff as you deem appropriate, to a meeting of key decision-makers of federal and state agencies to work toward the resolution of the issues required for a sound, workable mitigation plan. The meeting has been scheduled for Thursday, November 21st at 9:00 a.m. in my office in the federal building and will focus on agency contributions and commitments, schedules and timing for implementation, as well as funding elements and commitments. There will be a follow-up meeting of staff at 1:30 p.m. to resolve any outstanding technical issues, and to carry out the agreed upon work plan. I will be represented by Alexis Lum and Jennifer Golo Sabas of my Honolulu office.

As always, I hope I can count on your continued support and participation in the development of the Saddle Road project. Thank you for your attention to this matter.

Aloha,

DANIEL K. INOUE  
United States Senator

DKI:jsd

cc: *Reginald David*  
*Bell Moore*  
*Don Oshawa*  
*Lent McCauley*

Mr. Kazu Hayashida  
Director  
Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813  
Dear Kazu:

Phone: 587-2150 - Francis  
Fax: 587-2167  
Staff:

Lieutenant Colonel Ralph Graves  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, Hawaii 96858-5440  
Dear Colonel Graves:

Phone: 438-1069  
Fax: 438-8351  
Staff:

Colonel Owen Ryan

Commander  
HQ, U.S. Army Garrison, Hawaii  
Attn: APVG-GC  
Building 580, Room 100  
Schofield Barracks, Hawaii 96857-5000  
Dear Colonel Ryan:

Phone: 655-1558  
Fax: 655-1559  
Staff: Col. Florrie Tucker & Col. Dennis Fontana

Mr. Robert Smith  
Manager

U.S. Fish and Wildlife Service  
P.O. Box 50088  
Honolulu, Hawaii 96850  
Dear Mr. Smith:

Phone: x2749  
Fax: x 2756  
Staff: Brooks Harper

Mr. Michael Wilson

Director  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809  
Dear Mike:

Phone: 587-0400  
Fax: 587-0390  
Staff: Dean Uchida & Mike Buck

Lieutenant Colonel Lloyd Mues  
Commander  
HQ, PTA, USAG-HI  
Bldg. T-180  
Mikepost 36, 14200 (Saddle Road)  
Hilo, Hawaii 96720  
Dear Colonel Mues:

Phone: 1-969-2400  
Fax: Oahu 538-3501  
Staff:

Mr. Abe Wong  
Division Administrator  
Federal Highways Administration  
300 Ala Moana Blvd.  
Suite 3202  
Honolulu, Hawaii 96850  
Dear Mr. Wong:

Phone: x 2700  
Fax: x  
Staff:

Mr. Larry Smith  
Federal Highways Administration  
300 Ala Moana Blvd.  
Suite 3203  
Honolulu, Hawaii 96850  
Dear Mr. Smith:

Phone: x 2700  
Fax: x  
Staff:

Mr. Peter Kline  
Military Traffic Management Command

cto Federal Highways Administration  
300 Ala Moana Blvd  
Honolulu, Hawaii 96850  
Dear Mr. Kline:

Phone: x 2700  
Fax: x  
Staff:

***Saddle Road Palila Mitigation***

***November 21, 1996***  
***Office of Senator Daniel K. Inouye***

**Morning Session**

**Introduction and Welcome**

**Jennifer Goto Sabas, Chief of Staff - Hawaii**

**DAR Program and Project Overview**

**Larry Smith, Division Engineer, FHWA, Central Federal Lands Highways**

**Project Development History**

**Bill Moore, Senior Planner, Okabara & Associates**

**Project Coordination Requirements**

**Bert McCauley, Environmental Project Manager, CELHD**

**Palila Mitigation Plan**

**Reggie David, Principal, RANA Biological Services**

**Agency Discussions**

**Afternoon Session**

**Discussion of specific mitigation elements, processes, and coordination.**

**Action items necessary for mitigation plan development and finalization.**

1.4.4 Chronological Correspondence and Notices, 1997

Correspondance From:	Correspondance To:	Date
United States Senate	FHWA	1-17-97
FHWA	United States Senate	2-10-97
FHWA	USFWS	3-11-97
EcoPlan Associates, Inc.	DOH	4-8-97
FHWA	FHWA (Julie A. Cirillo)	3-19-97
FHWA	USACE	3-11-97
FHWA	MTMCTEA	3-11-97
FHWA	DLNR	3-11-97
FHWA	USAG-HI	3-11-97
FHWA	Honorable Daniel K. Inouye United States Senator, Hawaii	3-11-97
FHWA	HDOT	3-11-97
FHWA	Hawaii County Department of Public Works	3-11-97
FHWA	Distribution List	4-2-97
DLNR	FHWA	4-3-97
USFWS	Rana Productions	4-9-97
FHWA	SHPD	4-10-97
DLNR	Okahara & Associates, Inc.	4-21-97
FHWA	Distribution List	4-24-97
Steve Hurt	Okahara & Associates, Inc.	4-24-97
DLNR	FHWA	4-24-97
DOFAW	DLNR Land Division	4-14-97

DOFAW	DLNR Land Division	4-18-97
DOFAW	DLNR Land Division	4-23-97
DOA	FHWA	4-24-97
USFWS	FHWA	5-2-97
FHWA	DLNR	5-6-97
State of Hawaii - Department of Public Works	FHWA	5-7-97
FHWA	USACE	5-16-97
DLNR	FHWA	6-9-97
DOA	FHWA	6-23-97
HDOT	FHWA	6-26-97
DLNR	FHWA	7-18-97
FHWA	DLNR	7-31-97
DLNR	FHWA	7-31-97
Okahara & Associates, Inc.	DLNR	8-11-97
FHWA	USACE	8-18-97
FHWA	EPA	9-4-97
FHWA	USACE	
FHWA	USACE	9-17-97
FHWA	DOH	9-17-97
FHWA	DLNR	9-23-97
DOA	FHWA	8-22-97
Okahara & Associates, Inc.	Distribution list	9-3-97
DLNR	Board of Land and Natural Resources	8-21-97

FHWA	Office of Environmental Quality Control	10-15-97
FHWA	EPA	10-15-97
County of Hawaii - Department of Public Works	Hawaii County Council	10-17-97
County of Hawaii - Department of Public Works	Distribution list	10-17-97
County of Hawaii - Department of Public Works	Connie Kirlu	10-17-97
County of Hawaii - Department of Public Works	DHHL (Edward Andrade)	10-17-97
County of Hawaii - Department of Public Works	DLNR (Alan Takeya)	10-17-97
County of Hawaii - Department of Public Works	DLNR (Marc Smith)	10-17-97
County of Hawaii - Department of Public Works	DLNR (Jon Giffin)	10-17-97
County of Hawaii - Department of Public Works	DLNR (Charlene Unoki)	10-17-97
County of Hawaii - Department of Public Works	HDOT (Stanley Tamura)	10-17-97
County of Hawaii - Department of Public Works	DHHL (Herring Kalua)	10-17-97
County of Hawaii - Department of Public Works	DHHL (Jim Dupont)	10-17-97
County of Hawaii - Department of Public Works	DHHL (Dickie Nelson)	10-17-97
County of Hawaii - Department of Public Works	PTA	10-17-97
FHWA	USFWS	11-6-97
DLNR	FHWA	11-14-97
FHWA	EPA	12-15-97

DLNR	FHWA	12-22-97
USFWS	FHWA	12-29-97
USFWS	Rana Productions Ltd.	2-25-97

DANIEL K. INOUE  
HAWAII

APPROPRIATIONS  
Subcommittee on Defense

ARMY, NAVY, AIR FORCE AND TRANSPORTATION  
Subcommittee on Surface Transportation  
and Merchant Marine

COMMITTEE ON INDIAN AFFAIRS

DELEGATION BUILDING COMMITTEE

COMMITTEE ON RULES AND ADMINISTRATION

JOINT COMMITTEE ON PRINTING

United States Senate

SUITE 722, HART SENATE OFFICE BUILDING

WASHINGTON, DC 20510-1102

(202) 224-3834

FAX (202) 224-9747

January 17, 1997

The Honorable Rodney E. Slater  
Administrator  
Federal Highway Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Administrator Slater:

I am writing with regard to the Saddle Road project on the Island of Hawaii. The Federal Highway Administration (FHWA) has done an excellent job of working with the community and in developing and adhering to a rigorous time schedule.

As you know, the Saddle Road project is most important to me. Its purpose is to provide direct and safe access for our nation's military to transport its troops and supplies for training at the Pohakuloa Training Area (PTA), while aiding the residents and visitors who commute between the east and west parts of the island. Rust Environment and Infrastructure, as the prime contractor, has performed various engineering and supervisory services, including the preparation of the ongoing environmental impact study, under a contract awarded by the FHWA's Central Federal Lands Highway Division based in Denver. I have been advised that the quality of Rust's services has been excellent.

A project of this magnitude will also bring an economic benefit to the island's ailing economy. In this regard, I am pleased that the FHWA has endeavored to hire a multitude of local subcontractors to provide important information and services to move this project forward. However, I have been further advised that Rust may not be allowed to complete the project in its entirety because the company may be eliminated from consideration for the new design services contracts to be awarded in the near future by the FHWA. If the above is correct, would you please advise me as to why Rust has been eliminated from any consideration for the new design services contract?

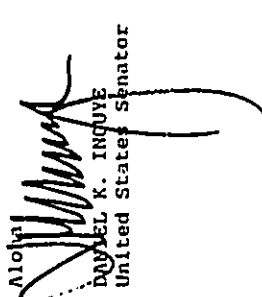
The planning and environmental component of the project is nearing completion, and as I understand it, the next phase will begin within the next year. I am committed to securing the necessary funding for the construction portion of the road improvements. I am confident that the FHWA will solicit and award the upcoming contracts to those firms that have demonstrated their professional ability to do the job, as well as have the

OF THE HOUSE OF REPRESENTATIVES  
1000 TIA, HONOLULU, HI 96813-1000  
HONOLULU, HI 96813-1000  
ROOM 1417  
FAX (808) 541-7448  
HAWAIIAN STREET, NO. 205  
HONOLULU, HI 96813  
FAX (808) 541-8113

The Honorable Rodney E. Slater  
January 17, 1997  
Page 2

support of my constituents and are working with the impacted communities in a fair and diligent manner.

I look forward to working with you on this important project. Please extend my appreciation to the men and women of the FHWA for the good work that they do for the people of Hawaii.

Aloha  
  
DANIEL K. INOUE  
United States Senator

DKI:jrg







Central Federal Lands  
Highway Division

556 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

MAR 11 1997

In Reply Refer To:  
HPD-16E

Mr. Robert P. Smith, Manager  
Pacific EcoRegion  
U.S. Fish and Wildlife Service  
P.O. Box 50088  
Honolulu, HI 96850

Dear Mr. Smith:

Enclosed are five copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and five copies of the Draft Biological Assessment for the preferred alternative, which is being submitted to you under Section 7 of the Endangered Species Act (ESA). As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental team with respect to National Environmental Policy Act issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Hamalahoa Highway.

Both the PDEIS and the Biological Assessment are preliminary in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on the documents by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are submitting the Draft Biological Assessment and requesting the initiation of early consultation under Section 7 of the ESA. We are also requesting that you use the contents of the Draft Biological Assessment to formulate a Preliminary Biological Opinion that may be referenced in the Draft Environmental Impact Statement. We realize that this document may require some modification and it is our intent to work with you and your staff to address any concerns you may have prior to the issuance of a preliminary opinion.

Submission of the PDEIS is an attempt to resolve any other environmental issues or concerns that your agency may have prior to publication of the document. In this regard, we would like to meet with you or other representatives of the Fish and Wildlife Service the week of April 7, to discuss any concerns you may have so we can make appropriate corrections to both documents. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosures

cc (w/o enclosures):

Ms. Julie Cirillo, Regional Administrator, Region 9, San Francisco, CA  
Mr. Abe Wong, Division Administrator, FHWA, Honolulu, HI  
Mr. Donald Okahara, Okahara & Assoc., Inc., Hilo, HI  
Mr. Don Griner, RUST E&I, Phoenix, AZ

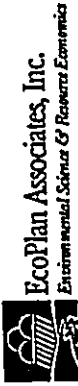
bcc (w/o enclosures):

J. Koller, HFL-16  
L. Henry, HPD-16  
D. Gedeon, HPD-16, Area 4  
J. Rippley, HRC-08  
B. McCauley, HPD-16, Environment

yc: reading file

Central file: \\environment\sadroad\fw\_s\_deis.ltr  
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BWF



Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25746  
Denver, Colorado 80225-0246

MAR 19 1997

In Reply Refer To:  
HFD-16E

April 8, 1997

Mr. Edward C.P. Chen  
Environmental Engineer  
Clean Water Branch  
Hawaii Department of Health  
919 Ala Moana Boulevard  
Room 301  
Honolulu, Hawaii 96814

Ms. Julie A. Cirillo  
Regional Administrator (IRA-09)  
Federal Highway Administration  
201 Mission Street, Suite 2100  
San Francisco, CA 94105

Dear Ms. Cirillo:

Enclosed is a copy of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and one copy of all technical reports. The Draft Biological Assessment is being submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act in a request for early consultation and a Preliminary Biological Opinion. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act issues and concerns within the limits of Saddle Road from Mile Post 6 near Iliho, to the Mamalahoa Highway.

RE: Saddle Road Preliminary Draft Environmental Impact Statement

Dear Mr. Client:

At the request of Mr. Bert McCauley, Federal Highway Administration, enclosed for your review is one copy of the Saddle Road Preliminary Draft Environmental Impact Statement. We regret that you were not provided a copy previously. If you have any questions or need any additional information, please give us a call.

Sincerely,

*Leslie S. McCaughey*  
Leslie S. McCaughey  
Senior Environmental Planner

Enclosure  
C: Bert McCauley (Without Enclosure)

Both the PDEIS and the Biological Assessment are *preliminary* in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration, Central Federal Lands Highway Division is interested in receiving your comments and views on the document by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May 1997.

Specifically, we are interested in your comments and views with respect to commitments to mitigation of archaeological, biological, or other impacts that will be required, as well as the overall completeness and coherency of the document. At this time, legal review is being provided by Region 8 Counsel. In this regard, we are planning a meeting of all PDEIS recipients the week of April 7 at Senator Inouye's office in Honolulu to discuss all issues and concerns so that we can make appropriate modifications to the document. It would be helpful if a representative of Region 9 could attend this meeting.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

/s/

Larry C. Smith, P.E.  
Division Engineer

Enclosures



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

MAR 11 1997

In Reply Refer To:  
HFD-16E

LTC Ralph H. Graves, Commander  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

Attention: Kathleen Dadey, Ph.D.  
Environmental Engineer

Dear Ms. Dadey:

Enclosed are two copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and two copies of the pertinent biological reports for the subject project. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Mamalahoa Highway.

The PDEIS is preliminary in nature and is being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on this document by April 10. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to any project features associated with impacts to waters of the United States. In this regard, we would like to meet with you and any other Corps of Engineers' personnel the week of April 7, to discuss any concerns you may have so that we can make appropriate modifications to this document. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosures

cc (w/o enclosures):  
Ms. Julie Cirillo, Regional Administrator, Region 9, San Francisco, CA  
Mr. Abe Wong, Division Administrator, FHWA, Honolulu, HI  
Mr. Donald Okahara, Okahara & Assoc., Inc., Hilo, HI  
Mr. Don Griner, RUST E&I, Phoenix, AZ



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

MAR 11 1997

In Reply Refer To:  
HFD-16E

Mr. Peter Cline  
HHC/TEA, ATTN: HTE-SA  
720 Thimble Shoals Boulevard  
Suite 130  
Newport News, VA 23606

Dear Mr Cline:

Enclosed is a copy of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and a copy of the Draft Biological Assessment which will be submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Mamalahoa Highway.

Both the PDEIS and the Biological Assessment are preliminary in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on both documents by April 10. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to any commitments to mitigation of biological or other impacts that the U.S. Army will be required to honor initially or in later phases of the project. In this regard, we would like to meet with you the week of April 7 at Senator Inouye's office to discuss any concerns you may have so that we can make appropriate modifications to both documents. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

/s/  
Larry C. Smith, P.E.  
Division Engineer

Enclosures



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

MAR 1 1 1997

In Reply Refer To:  
HPD-16E

Mr. Michael Wilson, Director  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, HI 96809

Dear Mr. Wilson:

Enclosed are three copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and three copies of the Draft Biological Assessment which will be submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Hamalahoa Highway.

Both the PDEIS and the Biological Assessment are preliminary in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on both documents by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to any commitments to mitigation of biological or other impacts that the Department of Land and Natural Resources (DLNR) will be required to honor initially or in later phases of the project. In this regard, we would like to meet with you and other DLNR representatives the week of April 7 to discuss any concerns you may have so that we can make appropriate modifications to both documents. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

/s/

Larry C. Smith, P.E.  
Division Engineer

Enclosures



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225 0246

MAR 1 1 1997

In Reply Refer To:  
HPD-16E

Colonel Ronnie W. (Randy) Tucker  
Director, DPTMSEC  
U.S. Army Garrison-Hawaii  
ATTN: APYG-GT  
Schofield Barracks, HI 96857-5000

Dear Colonel Tucker:

Enclosed are three copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and three copies of the Draft Biological Assessment which will be submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act (NEPA) issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Hamalahoa Highway.

Both the PDEIS and the Biological Assessment are preliminary in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on both documents by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to any commitments to mitigation of biological or other NEPA impacts that the U.S. Army will be required to honor initially or in later phases of the project. In this regard, we would like to meet with you and other USAF-HI representatives the week of April 7 to discuss any concerns you may have so that we can make appropriate modifications to both documents. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

/s/

Larry C. Smith, P.E.  
Division Engineer

Enclosures



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25746  
Denver, Colorado 80225-0246

**MAR 11 1997**  
In Reply Refer To:  
IPD-16E

Honorable Daniel K. Inouye  
United States Senator, Hawaii  
7325 Federal Building  
Honolulu, HI 96850  
  
Attention: Major General Alexis T. Lum (Ret.)  
Executive Assistant

Dear General Lum:

Enclosed are three copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and three copies of the Draft Biological Assessment which will be submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act (NEPA) issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Hamalahoa Highway.

Both the PDEIS and the Biological Assessment are *preliminary* in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on the documents by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to any commitments to mitigation of biological or other impacts that the State of Hawaii will be required to honor initially or in later phases of the project. In this regard, we would like to meet with you the week of April 7 to discuss any concerns you may have so that we can make appropriate modifications to both documents. We would like to utilize the same interagency meeting format as the November, 1996 meetings in the Senator's office.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosures



U.S. Department  
of Transportation  
Federal Highway  
Administration

555 Zang Street  
P.O. Box 25746  
Denver, Colorado 80225-0246

**MAR 11 1997**  
In Reply Refer To:  
IPD-16E

LTC Lloyd E. Hues, Commander  
HQ, PTA, USAG-HI  
Building T-180  
Hilepost 36, H200 (Saddle Road)  
Hilo, HI 96720

Dear Colonel Hues:

Enclosed are two copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and two copies of the Draft Biological Assessment which will be submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act (NEPA) issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Hamalahoa Highway.

Both the PDEIS and the Biological Assessment are *preliminary* in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on both documents by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to any commitments to mitigation of biological or other impacts that the U.S. Army will be required to honor initially or in later phases of the project. In this regard, we would like to meet with you and other USAG-HI representatives the week of April 7 to discuss any concerns you may have so that we can make appropriate modifications to both documents. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosures



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zeng Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

MAR 11 1997

In Reply Refer To:  
HPD-16E

Mr. Kazu Hayashida, Director  
Hawaii Department of Transportation  
809 Punchbowl Street  
Honolulu, HI 96813-5097

Dear Mr. Hayashida:


Enclosed are three copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and three copies of the Draft Biological Assessment which will be submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Hamalahoa Highway.

Both the PDEIS and the Biological Assessment are preliminary in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on the documents by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to the alternative route locations, the typical section proposed for the project, and commitments to mitigation of archaeological, biological, or other impacts that the Hawaii Department of Transportation will be required to implement in later phases of the project. In this regard, we would like to meet with you or other representatives of the Department the week of April 7 to discuss any concerns you may have so that we may make appropriate modifications to both documents. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

  
Larry C. Smith, P.E.  
Division Engineer

Enclosures



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zeng Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

MAR 11 1997

In Reply Refer To:  
HPD-16E

Donna Fay K. Kiyosaki, P.E.  
Chief Engineer  
Hawaii County Department of Public Works  
25 Aupuni Street, Room 202  
Hilo, HI 96720-4252

Dear Ms. Kiyosaki:


Enclosed are two copies of the Preliminary Draft Environmental Impact Statement (PDEIS) for Saddle Road and two copies of the Draft Biological Assessment which will be submitted to the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. As you know, the PDEIS addresses alternatives as developed by the Social, Economic, and Environmental Team with respect to National Environmental Policy Act issues and concerns within the limits of Saddle Road from Mile Post 6 near Hilo to the Hamalahoa Highway.

Both the PDEIS and the Biological Assessment are preliminary in nature and are being distributed at this time only to agencies who have some participation in the development of the project. As the lead agency, in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in receiving your comments and views on the documents by April 18. This will facilitate publication of the Draft Environmental Impact Statement scheduled for the first week of May, 1997.

Specifically, we are interested in your comments and views with respect to the alternative route locations, the proposed status of the abandoned roadway, commitments to mitigation, and any other aspects of the project that may affect Hawaii County or your resources. In this regard, we would like to meet with you and other representatives of the County the week of April 7 to discuss any concerns you may have so that we can make appropriate modifications to both documents. We will contact you at a later date for meeting arrangements.

If you have any questions about documents or project development schedules, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303)969-5924. Thank you for your participation in the advancement of this project.

Sincerely yours,

  
Larry C. Smith, P.E.  
Division Engineer

Enclosures



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

APR 02 1997  
In Reply Refer To:  
HPD-16E

Mr. Kazu Hayashida, Director  
Hawaii Department Of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097

Dear Mr. Hayashida:

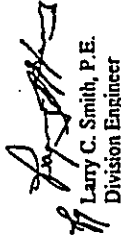
As you are aware, distribution of the Preliminary Draft Environmental Impact Statement (PDEIS) and pertinent associated documents has been made to those agencies who have a participatory interest in the Saddle Road Project. As the lead agency in cooperation with the Hawaii Department of Transportation, the Federal Highway Administration is interested in obtaining your agency's views on the adequacy of the document, with respect to your interests and/or regulatory concerns.

In our letter of March 11, which transmitted the above referenced documents, we indicated we would like to meet with you and/or your staff the week of April 7 to review and discuss your concerns. Accordingly, we have scheduled a meeting of all reviewing agencies for Wednesday, April 9, at 9:00 a.m., in the Office of Senator Inouye located in the Federal Building, Room 7325.

The purpose of the meeting will be to review the issues as presented in the preliminary draft document from your agency's standpoint to ensure that all concerns are addressed adequately prior to publication of the Draft Environmental Impact Statement in May. It is hoped that this meeting will help finalize all written comments on or before April 18. The meeting will also focus on identification of key coordination and/or decision milestones that will need to be met to keep the project on schedule.

A preliminary agenda is enclosed for your review. Should you have any questions, please call Messrs. Glenn Yasui, Project Coordination Engineer at (808)541-2700, or Bert McCauley, Environmental Project Manager at (303)969-5924.

Sincerely yours,

  
Larry C. Smith, P.E.  
Division Engineer

Enclosure

cc (with enclosure):

Ms. Julie A. Cirillo, Regional Administrator (HRA-09), Federal Highway Administration,  
201 Mission Street, Suite 2100, San Francisco, CA 94105  
Mr. Abraham Y. Wong, Division Administrator (HAD-HI), Federal Highway Administration,  
Box 50206, Honolulu, HI 96850  
General Alexis T. Lum, Executive Assistant, Office of Senator Daniel K. Inouye,  
300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850  
Mr. Donald Okahara, Okahara & Associates, Inc., 200 Kohola Street, Hilo, HI 96720  
Mr. Don Griner, Project Manager, RUST Environment & Infrastructure, 5343 North 16th  
Street, Suite 400, Phoenix, AZ 85016

bc (with enclosure):

J. Roiler  
L. Henry  
D. Gedeon  
B. McCauley  
yc: reading file  
Central file - HI A-AD 6(1), Saddle Road  
BMCCAULEY:jm:4/2/97L:\environment\wp\sadroad\senator.lr

§46.



*Saddle Road Draft Environmental Impact Statement  
Agency Review*

*April 9, 1997  
Office of Senator Daniel K. Inouye*

Identical Letter To:

Maj. Gen. Alexis T. Lum (Ret.)  
Executive Assistant  
Office of U.S. Senator Daniel K. Inouye  
7325 Federal Building  
Honolulu, HI 96850

LTC Lloyd E. Mues, Commander  
HQ, PTA, USAG-HI  
Bldg T-180  
Milepost 36, HI200 (Saddle Road)  
Hilo, Hawaii 96720

Lt. Col. Ralph H. Graves, Commander  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

LTC Al Lewis, Director  
DPTMSEC, U.S. Army Garrison Hawaii  
ATTN: APVG-GT  
Schofield Barracks, Hawaii 96857-5000

Col. Owen D. Ryan, Commander  
HQ, U.S. Army Garrison, Hawaii  
Attn: APVG-GC  
Building 580, Room 100  
Schofield Barracks, HI 96857-5000

Mr. Peter Cline  
MTMCTEA, ATTN: MTTE-SA  
720 Thimble Shoals Boulevard  
Suite 130  
Newport News, VA 23606

Mr. Wayne Hamaguchi, Chief  
Planning Branch  
U.S. Army Pacific Command, Hawaii  
Attn: APEN-IP  
Building 104  
Fort Shafter, HI 96858-5100

Mr. Robert P. Smith, Manager  
U.S. Fish & Wildlife Service  
P.O. Box 50088  
Honolulu, HI 96850

Mr. Michael Wilson, Director  
Department Of Land & Natural Resources  
P.O. Box 621  
Honolulu, HI 96809

Hawaii County Department of Public Works  
Dorina Fay K. Kiyosaki, P.E.  
Chief Engineer  
25 Aupuni Street, Room 202  
Hilo, HI 96720-4252

Morning Session

- Introduction and Welcome  
Jennifer Goto Sabas, Chief of Staff - Hawaii
- Project Overview and Meeting Purpose  
Bert McCauley, Environmental Project Manager, FIWA
- Project Coordination Requirements  
Bill Moore, Senior Planner, Okahara & Associates
- Biological and Regulatory Issues  
Reggie David, Principal, RANA Productions, Ltd.
- Agency Discussions

Afternoon Session

- Discussion of specific DEIS text, elements, data, and/or analyses.
- Action items required for finalization of the Draft EIS for publication.
- Action items required for completion of mitigation and regulatory requirements.

MANAGEMENT DIV. ID:808-587-0455

APR 03 '97 15:46 No. 016 P.01  
APR 03 '97 15:47 No. 016 P.02



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
P.O. BOX 21  
HONOLULU, HAWAII 96824

WILLIAM L. MOORE  
GOVERNOR OF HAWAII

MICHAEL B. WILSON  
Commissioner  
DIVISION OF LAND AND NATURAL RESOURCES

DEPUTY  
GILBERT S. COLOMA-AGARAN  
ADJUTANT GENERAL (COM-10)  
ADULTS PROTECTIVE  
ADULTS AND CHILD PROTECTIVE  
COMMUNITY CARE  
COMMUNITY DEVELOPMENT  
COMMUNITY SERVICES  
FIRE AND PUBLIC SAFETY  
HAWAIIAN CULTURE  
HAWAIIAN LANGUAGE  
HAWAIIAN TRADITIONS  
HAWAIIAN WILDLIFE  
HAWAIIAN WOODS

APR 3 1997

Ref: DIM-GYT97-10167

**MEMORANDUM**

To: Glenn M. Yabui  
Federal Highway Administration

From: Gilbert S. Coloma-Agaran *Gilbert S. Coloma-Agaran*  
Deputy to the Chairperson

Subject: Replacement lands for lease lands affected by the  
Proposed Palila Mitigation Plan

As a follow-up to our meeting of February 4, 1997, held at the SC Ranch office with the ranchers impacted by the Palila Mitigation Plan, a review of our land inventory was conducted to determine whether replacement lands in the districts of North Hilo, Hamakua and North Kohala were available. With the recent signing of the Letter of Intent with Oji Paper Co., Ltd. and Marubeni Corporation for the purpose of establishing a pulpwood forestry plantation, the former sugar lands in Hamakua/North Hilo are no longer available. The remaining available parcels in the districts under review are limited in both size and utility, i.e. gulches, streams, etc.

Consequently, with the exception of the former sugar lands in Ka'u which were deemed to be undesirable because of the great distance from the ranchers existing operations, there does not appear to be sufficient acreage of State-owned lands available to implement a replacement program.

Should you have any questions, please feel free to call on me at 587-0403 or Glenn Y. Teguchi at 587-0439.

c: Hawaii Land Board Member  
Hawaii District Land Office  
William L. Moore



**United States Department of the Interior**

FISH AND WILDLIFE SERVICE  
PACIFIC ISLANDS ECOREGION  
300 ALA MOANA BOULEVARD, ROOM 3108  
BOX 50088  
HONOLULU, HAWAII 96850  
PHONE: (808) 541-3441 FAX: (808) 541-3470

APR - 9 1997

In Reply Refer To: Saddle Road (mmb)

Dr. Reginald David  
Rana Productions  
P.O. Box 1371  
Kailua-Kona, Hawaii 96745

RE: Preliminary Draft Biological Assessment of the Preferred Alignments for the Saddle Road (State of Hawaii Route 200), Island of Hawaii, Hawaii

Dear Reggie,

This is in reference to the letter dated March 11, 1997, from the Federal Highways Administration, which requested comments on the Preliminary Draft Biological Assessment (BA) of the Preferred Alignments for the Saddle Road (State of Hawaii Route 200), Island of Hawaii, Hawaii and the Preliminary Draft Environmental Impact Statement (DEIS) to improve Hawaii State Route 200, Mamoahoa Highway to Milepost 6, Saddle Road. The Fish and Wildlife Service (Service) offers the following preliminary comments for your consideration on the Preliminary Draft BA. The Service will provide in writing our comments on the Preliminary Draft BA and the Preliminary DEIS to your office by May 2, 1997.

**General Comments (for entire BA)**

- o The draft BA deals with the "preferred alignments" for the Saddle Road realignment. However, the preferred alignment is not specified for any of the four sections dealt with in the BA. For Sections I, II, and IV there are two routes identified and no preference given. For Section III, only one route is identified (EX-3); however, the Federal Highways Administration (FHWA) intends to modify this proposed route (see first paragraph on page 45).
- o Some of the Figures are difficult to read. We recommend that the same base map be used for all Figures, with the specific areas to be depicted in each Figure enlarged and used. This would enable the reader to follow the same landmarks from map to map.
- o More discussion about the effects of the action on critical habitat should be included.

- o While the "Overview of Potential Biological Impacts" section on page 10 correctly states that there will be an increased likelihood of access and colonization of biologically important areas by alien ungulates and mammalian predators among other organisms, the remainder of the DA does not address the increased threats from ungulates and mammalian predators and offers no mitigation for these potential threats.
  - o In all four sections, the impacts from possible increase in mammalian predators and their effects on listed species should be addressed (e.g., nene, dark-rumped petrel, palila, Newell's shearwater, and other forest birds).
  - o If the improvement of Saddle Road will likely result in an increased speed limit or increased speeds, the effects of this on the nene should be analyzed in all four sections.
  - o None of the plant or invertebrate species of concern (SOCs) are discussed in the preliminary draft BA. While it is not mandatory in section 7 consultations to include SOCs, the Service recommends that they be included in the discussion. Because of the length of time involved in completing this project, it is likely that some of the SOCs will become candidates, if not proposed or listed species, by the time construction is completed. Therefore, it behooves the FITWA to include SOCs in the discussion at this time, to reduce the need for re-initiation in the future.
  - o It would be very helpful for the Service to have copies of the reports from the consultants for the botanical and invertebrate surveys, to review the more detailed information on exactly which species were found and at what locations along or near the corridors.
- Page by Page Surcifics**
- o Page 5, 2nd paragraph: The 2nd paragraph states that the proposed improvements would provide a two-lane highway to accommodate increased traffic. The DA does not specify how taking an existing two-lane highway and realigning it to create another two-lane highway will handle increased traffic. *If there are improvements to be made, such as straightening and widening of the highway, this should be specified. Also, if these improvements will result in increased speed limits, this should be specified.*
  - o Page 5, Last paragraph: This states that the section 7 consultation is "focused on Section II" and that section 7 will be re-initiated in the future when funding is secured for the remainder of the Saddle Road realignment. *It is our understanding that section 7 consultation is being sought for the entire project, not just Section II.*
  - o Page 8, paragraph 1: The text mentions three endangered and one threatened plant within the project area, but only lists the threatened plant in the accompanying table on

- o page 9 (Table 2), while 11 species are mentioned in Table 10 on page 41. *All threatened and endangered species should be mentioned in the table and discussed in the appropriate section of the BA.*
- o Page 21, 4th paragraph, last line: A reference is needed for the statement that the Argentine, big headed, and *Cardiocoenophila veneswula* ants are not believed to directly effect *Cydia caterpillars* (Paul Banko's report to the Army?).
- o Page 22, last paragraph: The discussion of *Silene hawaiiensis* and other threatened and endangered species should be discussed under Discussion of the Potential Impacts to Listed Species, rather than as Other Biological Impacts. Identified, since it is a listed species. The initial discussion of impacts to the species should include a discussion of both populations, not just the one at Pu'u Ma'u. Besides alien plant and invertebrate introductions, fire is another serious threat to *Silene hawaiiensis* at both populations. Construction workers could start fires with cigarettes or idling equipment. *Steps to prevent fire, as are discussed under the comments on the fire mitigation plan, should be included for the protection of Silene hawaiiensis.*
- o Page 25, second paragraph, 4th line: The BA should clarify that the modification of 30 hectares of Palila Critical Habitat applies to the PTA-1 option, while the modification of 34 hectares applies to the PTA-3 option.
- o Page 25, 4th paragraph, 7th line: The BA should specify the particular "training restrictions" referred to in the referenced section 7 consultation and USACH PTA External Standing Operating Procedures document so that we may more thoroughly review these restrictions and determine if they are still applicable and suitable to avoid undue adverse effects to endangered and threatened species. Also, because the largest population of *Silene hawaiiensis* in PTA (approximately 5,000 individuals) is adjacent to the existing alignment, training use of the area may have an impact on this population in addition to the two populations along the corridors (see discussion on Page 35, last paragraph).
- o Page 35, 2nd paragraph, 8th line: Reference is made to the Army's PTA Fire Management Plan. We have still not received a copy of the Fire Management Plan and continue to believe that it is critical that we, and other parties associated with the Saddle Road realignment project, be offered the opportunity to review this plan in conjunction with the draft EIS and BA for this project. Fire mitigation should include both sides of the road throughout PTA, since the vegetation types found there (mamane/nato, *Eragrostis* grassland, and "awcoweo shrubland) are known only from this area or best developed in this area. It is likely that *Silene hawaiiensis* is present in additional areas within the latter two vegetation types, and fire is a threat to the species. Also, a large fire could carry into

adjacent vegetation types, including the area of western PTA that is so dense with endangered plants and is about 5 miles away. The Kipuka Kalawamauna fire carried at least 5 miles. A copy of the actual fire management plan should be included in the BA as an Appendix.

o Page 35, last paragraph: Since the preferred routes (both of the options PTA-1 and PTA-3) will result in the destruction of a population of the endangered plant, *Silene hawaiiensis*, we would like to have a plan in place, with appropriate partners, funding, and time-frames identified, to somehow "mitigate" for this destruction. The management plan to carry out the general mitigation measures outlined in this section of the BA should be prepared and should be included as an integral part of this BA, similar to that which was done for the palila. The plan should include the following parts:

- Collection of seeds (no other propagation method works for this species) prior to the beginning of construction. It would be prudent to agree on the mitigation for this species as quickly as possible, so that the seeds can be collected when available, probably in the next few months. With only 70 plants, it should be possible to collect seeds from all individuals that flower between now and the time construction starts in that area.

- Propagation of plants for reintroduction purposes. The viability of these seeds in storage is unknown, so they cannot be collected and held for any length of time. The Army is in the process of getting a collection and propagation permit from the Service, which should include this species. Since the viability of these seeds in storage is unknown, seeds should be sent to National Tropical Botanical Garden to test standard storage methods and to National Seed Storage Laboratory in Fort Collins to test cryopreservation methods, in addition to those seeds collected for immediate propagation.

- Reintroduction. Suitable habitat (rocky outcrops, cinder, or pahoehoe cracks), should be located in an area where threats will be or have been minimized. Since ungulates are a major threat to this species, the outplanting will need to occur within a fenced area. While the Army is (hopefully) going to fence three areas within PTA, only one site is potentially suitable for this species. The fenced areas planned at the Multi-Purpose Range Complex and Puu Ka Peie are not suitable, because they do not have many rocky outcrops and because a closely related species, *Silene lanceolata*, occurs naturally in both of these sites. There is chance of hybridization occurring if these two listed species are grown side by side. The area to be fenced within Kipuka Kalawamauna (1300 acres) may be suitable, but will have to be surveyed to determine if there are likely sites for reintroduction. Participants in this survey should include botanists from PTA, the consultants, the Service, and Colorado State University, if they are on the island. Kipuka Kalawamauna has the most similar habitat to the plants found within the road corridor. If no suitable area is found within the Kipuka Kalawamauna fence, other potential sites within or near PTA will need to be surveyed. In addition to fencing

for ungulate control, there will also need to be a detailed management plan which includes weed control, a fire management plan, and monitoring. At a minimum, the site for reintroduction should be chosen before the mitigation costs are finalized, since the costs will increase if additional fencing is needed.

The population of *Silene hawaiiensis* at the eastern side of PTA, which is currently nearly goat-free because of Saddle Road traffic, will probably have an increase in goat browsing if the road is realigned to go behind the airfield. This population should be monitored to ensure that the goat browsing does not increase after this portion of Saddle Road is no longer used by the public, and that increased Army activity does not impact the plants. If monitoring does reveal increased impact (which should be determined by the Service, the Army, and perhaps BRD), the area will need to be fenced to protect this population, which is currently the largest population within PTA.

The costs of this propagation and reintroduction and responsible parties should be included in the mitigation costs of the project.

o Page 36, 2nd paragraph, lines 12-13: Reference is made to a comprehensive weed and alien insect monitoring and control program, to be developed by the Army. What about mammalian predators? When will this plan be available for review? Monitoring should occur at least twice a year, to ensure that a species does not get established and widespread in between monitoring periods. While monitoring of alien invertebrates is a great idea, it is a very unattainable goal for \$20,000. It would cost more than that to identify invertebrates collected at one time, and that would leave no funding for the control and there is very little information available on control of invertebrates in native communities. Also, the construction of the road is only the initial avenue for allowing alien species into the area. There will be a constant threat of alien invasion from species being carried up the road on traffic once the road is built. There is no discussion of whether this control is aimed at specific species, plant or invertebrate, or at all alien species. A more beneficial use for the money would be chemical control of fountain grass (the most detrimental alien species in PTA) in the area(s) where *Silene hawaiiensis* will be reintroduced. The cost for this would be approximately \$125,000 per year, and should continue for at least 5 years, until the fountain grass is at a very low level and can be controlled manually by the Army's environmental office using staff time only. Also, the weed monitoring should include all of the kipukas in Section III of the project. This plan should be done in conjunction with the BRD-USGS (see page 46 and comment given below). It should be reviewed and incorporated as an Appendix to this BA, since this is the document that will identify those measures to be taken by the Army and others to control the invasions of alien insects and weeds (and, hopefully, mammalian predators).

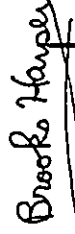
o Page 36, last paragraph: The draft BA mentions two populations of *Silene hawaiiensis*, one within the corridor in PTA, and a second outside the development corridor on the

the Army, so that only ONE plan for alien species control measures and monitoring is prepared for this Saddle Road project. It should be reviewed and incorporated as an Appendix to this BA, since this is the document that will identify those measures to be taken by the Army and others to control the invasions of alien insects and weeds (and, hopefully, mammalian predators).

- o Page 48, 1st paragraph, 2nd line, and Figure 2: This paragraph states that only two options are being considered for Section 4 (E-3 and EX-4A); however, Figure 2 shows a third option, E-4. This needs to be clarified.

We greatly appreciate this opportunity to provide preliminary comments on the proposed action at this early stage. As mentioned in our meeting with you this morning, the Service will provide complete comments on the Preliminary Draft BA and the Preliminary DEIS to the Federal Highways Administration by May 2, 1997. If you have questions regarding these comments, please contact me or Assistant Field Supervisor/Endangered Species Karen Rosa at 808-541-3441.

Sincerely,



Brooks Harper  
Field Supervisor  
Ecological Services

summit and south flank of Pu'u Ma'au. However, the endangered plant map (Figure 4) shows only the location of the population within PTA. The text also does not give any information on the numbers of individuals for the Pu'u Ma'au population. This BA should include at a minimum monitoring of the population during construction, since there is concern that construction may have an adverse impact on the population. In addition, the Service recommends including collection of seeds and propagation, so that if this population is damaged during construction, propagated material can be used to replace the lost plants.

- o Page 37, 1st line: Particulars about the fencing proposed to protect the *Silene hawaiiensis* population from construction-related activities need to be given, such as the type and size of fence; the size of the enclosure; the length of time the fencing will remain; and, measures to manage the population within the fence if applicable (e.g., weeding, removal of ungulates; etc.).
- o Page 37, paragraph 4: The comprehensive construction manual outlining and discussing the environmental issues should be reviewed by the Service prior to any construction.
- o Page 41, table 10 and pages 44-45: While 11 threatened and endangered species are mentioned in EX-2 as occurring in or near the corridor, only three species are addressed, and only one (*Platago hawaiiensis*) has planned fencing. There is no clear statement as to why the other species are not being treated the same way. This should be clarified or the same precautions should be taken for all species.
- o Page 44, last paragraph, last 2 lines: The same comment made above with respect to the *Silene* fencing applies to this section regarding *Platago hawaiiensis*.
- o Page 45, paragraph 2: "... all kipuka which still harbor native species" means all kipuka along the route. This should be made clear, as the current phrasing makes it sound as if some kipuka are not native and do not need to be avoided. Also, there should be more detailed information on how the effects on the kipuka will be "minimized". Will all kipuka be avoided, or only some? For those that are not avoided, what efforts are being taken to minimize the effects?
- o Page 46, 1st paragraph, 3rd line: The same comments that apply to *Silene* and *Platago* fences (above) apply to this section regarding the kipuka identified in Table 11.
- o Page 46, 3rd paragraph, 7th line: Reference is made to a plan that will be developed by BRD-USGS on weed and alien insect monitoring and control. What about mammalian predators? How does this differ from the plan to be prepared by the Army (see page 36)? When will this plan be available? This document should be done in conjunction with



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zeng Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

APR 10 1997  
In Reply Refer To:  
HFD-16E

Mr. Don Hibbard, Administrator  
State Historic Preservation Division  
33 South King Street, 6th Floor  
Honolulu, Hawaii 96813

Attention: Mr. Patrick C. McCoy

Dear Mr. McCoy:

The Federal Highway Administration (FHWA), through the Central Federal Lands Highway Division (CFLHD) and the Hawaii Department of Transportation (HDOT), in cooperation with the U.S. Department of Defense are proposing to improve Hawaii State Route (SR) 200, Saddle Road, on and adjacent to the Pohakuloa Training Area (PTA). The proposed improvement begins near Hilo at milepost 6 (the intersection with the proposed Puainako Street extension) and extends approximately 48 miles (77 kilometers) west to a junction with the Mamalaioa Highway, Hawaii (SR) 190. The CFLHD is preparing the Draft Environmental Impact Statement for the proposed highway improvements following the Council on Environmental Quality's (CEQ) "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA)" of November 29, 1978, 40 CFR, Parts 1500-1508.

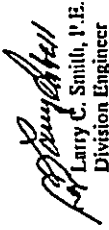
Under contract with the FHWA, Paul H. Rosendahl, Inc. (PHRI), Hilo, Hawaii, has conducted a cultural resources survey for the proposed highway corridor. The PHRI survey located a total of 16 historic properties and 35 modern military sites within the archaeological area of potential effect (APE). Please refer to the final report entitled *Archaeological Inventory Survey and Historic and Traditional Cultural Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project*. (Previously furnished)

On the basis of the PHRI recommendations, we have determined that sites 50-10-34-20864, 50-10-31-5002, 50-10-33-10309, 50-10-33-20855, 50-10-32-21150, 50-10-32-7119, 50-10-33-20878, and 50-10-34-20870 appear to be eligible for the National Register of Historic Places (NRHP). We have also determined that eight additional historic properties and 35 modern military sites do not appear to meet any of the criteria of eligibility for inclusion in the NRHP. The additional historic properties are numbered 50-10-21-20854, 50-10-32-20862, 50-10-32-20865, 50-10-32-20877, 50-10-33-20856, 50-10-34-20869, 50-10-34-20872, 50-10-34-20873. Refer to Appendix E of the inventory report for temporary site numbers assigned to modern military sites.

Pursuant to Section 106 of the National Historic Preservation Act and 36 CFR 800.4(c)(2), the FHWA asks that you review the inventory report and provide us with your opinion on eligibility. We also ask your concurrence for a consensus determination of eligibility for the subject historic properties. Furthermore, would you please comment on the validity of the effect determination for each of the eligible sites as a result of the mitigation proposed for each site in the report.

If you have any questions, please contact Messrs. Bert McCauley, Environmental Project Manager at (303) 969-5924 or Stepien Hallisy, Environmental Protection Specialist at (303) 969-5912. Thank you for your cooperation in this matter.

Sincerely yours,

  
Larry C. Smith, P.E.  
Division Engineer

cc: Mr. Abe Wong, Division Administrator (HAD-III), Federal Highway Administration,  
Box 50206, Honolulu, HI 96850  
Ms. Julie A. Cirillo, Regional Administrator (IRA-09), Federal Highway Administration,  
201 Mission Street, Suite 2100, San Francisco, CA 94105

Mr. Donald Okahara, Okahara and Associates, Inc., 200 Kohola Street, Hilo, HI 96720

bc: J. Roller

D. Geddon

B. McCauley

yc: reading file

Central file: HI A-AD-6(1), Saddle Road

DMcCAULEY:jm:4/9/97:L:\environment\wp\sadroad\shpo\_cflh

BY WILLIAM J. CAVETANO  
Governor of Hawaii



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF STATE PARKS  
P. O. BOX 936  
HILO, HAWAII 96721

April 21, 1997

Mr. William L. Moore  
Senior Planner  
Okahara & Associates, Inc.  
200 Kohola Street  
Hilo, HI 96720

Dear Mr. Moore:

This letter is confirming our discussion regarding the proposed Saddle Road realignment in relationship to the Mauna Kea State Park's boundaries. The focus of our conversation was the southwest corner of the park.

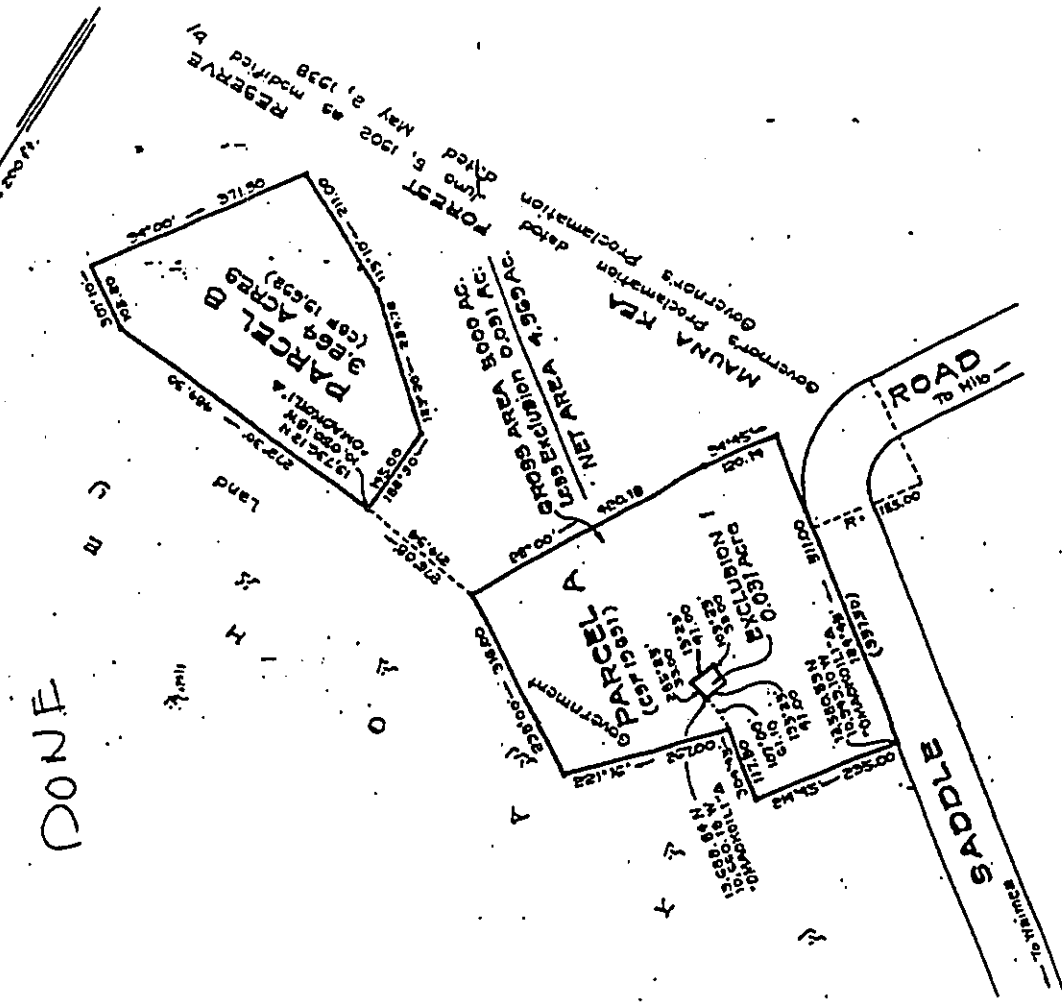
After reviewing the submitted map, the planned realignment does not penetrate the park premises nor will it affect its operations.

Should there be any other concerns you may have, please feel free to call me at 974-6200.

Sincerely,  
*Charles K. Supe*  
Charles K. Supe  
Hawaii Dist. Park Superintendent

cc: R. Nagata-St. Prk Admin.  
C. Hobokawa-Prk Prgm Mgr  
file

RECEIVED  
APR 23 1997  
OKAHARA & ASSOC., INC.  
HILO OFFICE



DONE

MAUNA KEA STATE PARK  
POHAKULOA AREA  
PARCELS A AND B  
Kaohi, Hamakua, Island of Hawaii, Hawaii  
Scale: 1 inch = 200 feet

RECEIVED AS FOLLOWS



U.S. Department of Transportation  
Federal Highway Administration

U.S. DOT / FHWA / CFLHD / HPD-16E

555 Zang Street  
Lakewood, CO 80228  
(303) 969-5924  
Fax: (303) 969-5903  
Email: berfm@road.cflhd.gov  
FAX TRANSMISSION COVER SHEET

Date: 4-24-97

To: SEE BELOW

Fax: AS LISTED

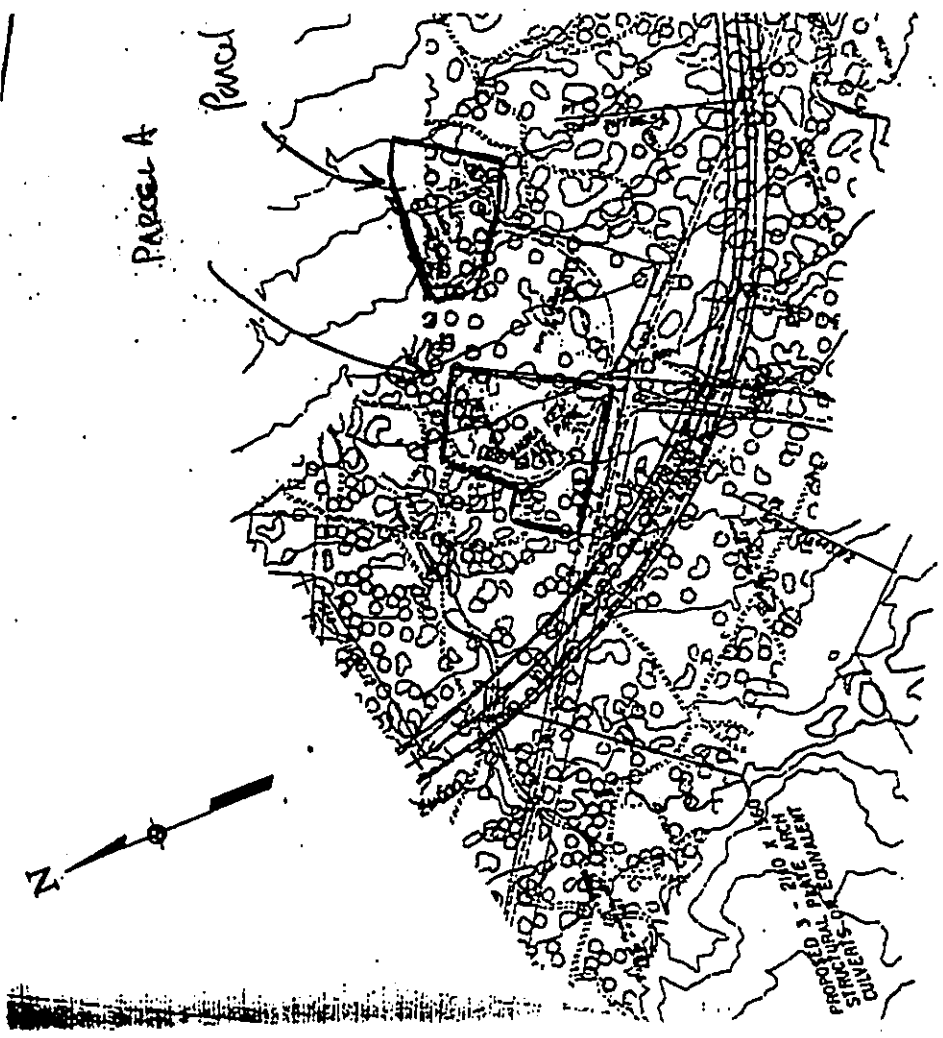
Re: SADDLE ROAD DE'S REVIEW AGENCIES' MEETING

Sender: Bert McCauley



No. Pages: 1

MR. KAZU HAYASHIDA : 587-2187	THIS IS TO REMIND ALL
MAT. GEN. ALEXIS LUM : 541-2549	PARTICIPATING AGENCIES
LTC. RALPH GRAVES : 438-7801	OF DOCUMENT & ISSUES.
COL. OWEN RYAN : 655-1683	REVIEW MEETING 25 APR.
MR. WAYNE HAMAGUCHI : 438-8690	@ 9:00 A.M. IN SENATOR
MR. ROBERT SMITH : 541-3470	DANIEL INOUE'S OFFICE.
MR. MICHAEL WILSON : 587-0390	THANK YOU FOR YOUR
MS. DONNA KIYOSAKI : (808) 961-8630	ASSISTANCE.
LTC. AL LEWIS : 655-1683	<i>Bert McCauley</i>
LTC. LLOYD MUES : (808) 538-3501	
MR. ABE WONG : 541-2704	
MR. DONALD OKAHARA : (808) 961-5529	





RECEIVED AS FOLLOWS

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OKAHARA & ASSOC.

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MITIGATION PACKAGE FOR THE HUNTING COMMUNITY 2

Kipuka Alala is an area affected by the Palila Mitigation Package. Kipuka Alala acts as a feeding and nesting area that is on occasion hunted providing a balance that allows for this area's hunting activities to continue indefinitely. Under the Palila Mitigation Package all mammals in Kipuka Alala will be eliminated.

Law Ranch (TMK 4-4-15-0), currently being leased to Parker Ranch for grazing, has provided excellent game bird habitat and is also affected. The lease is one of the only areas on the Big Island that features a special youth hunt for game birds and due to its terrain and elevation offers an area for our older citizens to enjoy. After youth hunt is over elderly hunters are not forced to "give up" hunting for a lack of lower elevation hunting.

Pu'u Mall areas being suggested in the Palila Mitigation Package are currently under lease agreements with the State of Hawaii. Their current uses helps keep game birds populations and mammal populations at their present acceptable levels.

The proposed ungulate control in Pu'u Lau and affected Pu'u Mall areas will take them to numbers that may make them extremely difficult to repopulate. In addition to the fact of the loss of the area, loss of grazing game mammals will cause alien weeds and grasses to have a long term negative effect on game birds. This game mammal loss will deprive birds of their normal insect food from animal droppings, erases feeding corridors and creates wet and cold conditions. These wet and cold conditions affect chicks and during a "off spring" will greatly reduce game bird populations.

To offset these negative impacts of the Saddle Road Realignment and Palila Mitigation Package and to create the opportunity for the hunting community to commence creating suitable mammal and bird habitat, one that

From:  
Steve Hunt  
17-124 Palaa'i St  
Keaau, Hawaii 96749

To:  
4/24/97  
William Moore, Senior Planner  
Okahara and Associates Inc.  
200 Kohola St.  
Hilo, Hawaii 96720

RECEIVED  
APR 24 1997

OKAHARA & ASSOC., INC.  
HILO OFFICE

SADDLE ROAD REALIGNMENT  
MITIGATION PACKAGE FOR THE HUNTING COMMUNITY

The hunting community understands the need for the Realignment of the Saddle Road. The approximately 52 acres utilized for the new portion of the road on the back side of Pohakuloa Training Area passes thru areas that have been traditionally excellent hunting and nesting areas for game birds and huntable mammals. This is a progressive move made by the Army to enhance training and safety for our Nation's safetkeepers.

if there were no other mitigations or impacts to hunting areas our package would not be submitted, however the Palila Mitigation Package tied to the Saddle Road Realignment directly impacts the finest bow hunting, bird hunting and sustainable habitat for game animals. Our proposed Saddle Road Realignment Mitigation Package for the Hunting Community is to compensate the hunting community for their losses which are tied to the Realignment of the Saddle Road and the consequent Palila Mitigation Package.

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MITIGATION PACKAGE FOR THE HUNTING COMMUNITY 3

necessary.

The U.S. Army or Federal Highway Funds are to purchase approximately five thousand acres (5000 acres) from Parker Ranch which is adjacent to Pu'u Anahulu. Contact at Parker Ranch Mr. Mel Hawlett phone 808-885-9040 has agreed to sell this portion and negotiate the price when the actual letter of intent to purchase is signed. All future expenses, surveying, mapping, fencing and legal documentation would be borne by the purchasing party funded by the Saddle Road Realignment Mitigation Package for the Hunting Community.

The purchased parcel is to be deeded to the State of Hawaii in the classification of "Public Hunting Area." The Saddle Road Realignment Mitigation Package for the Hunting Community is allocate the state Division of Forestry and Wildlife to assess and relocate any listed endangered, threatened or candidate plants to Kipuka Alala. Kipuka Alala's environment is identical to the proposed Parker Ranch areas and biologically feasible according to several biologists. This will allow the area to remain in its intended purpose forever.

A D-9 Caterpillar bulldozer is to be purchased. Funding is to be allocated for a qualified wildlife biologist and qualified D-9 operator. Other expenses include a pick-up 4x4, nursery reservoir, piping and a predation and poaching control program. The intent of the manpower and equipment requests are to allow the purchased Parker Ranch area, Pu'u Anahulu and Pu'u Waawaa to be biologically adjusted to create a beginning native ecosystem capable of maintaining a sustainable hunting number of animals and birds.

See attached sheet "A Review of Monies Required to Fund Mitigation." Attached Sheet titled "Survivor Needs Analysis Calculations" shows the dollar amounts over the required amount of time required for this fifteen year program.


It is further required that the Palia Recovery Package ungulate control

MITIGATION PACKAGE FOR THE HUNTING COMMUNITY 4

program include no less than ninety percent (90%) removal for relocation versus extermination by snaring, poisoning or staff hunting. This is to be closely monitored by and in consultation with the hunting community and State of Hawaii Biologists.

To undertake the task of reforesting the Parker Ranch parcel, Pu'u Anahulu, and the bottom portion of Pu'u Waawaa is indeed a huge endeavor but is necessary to maintain the quality of areas removed from citizens and hunters alike.

If paragraph 1 on page 40 (See statement #3) of the E.I.S. prepared for Helco 138 KV Transmission Line is understood and taken in the same opinion as as what allowed the transmission line to proceed and the Palia Mitigation Package linked to the Saddle Road Realignment is deemed truly unnecessary, please contact me immediately and a formal letter will be sent rescinding our package.

Best,  
  
 Steve Hurt  
 Hunter Representative

cc: Senator Daniel Inouye  
 Senator Daniel Akaka  
 Col. Mues, Commander of PTA  
 Micheal Wilson, Head o DLNR  
 Mayor Stephen Yamashiro  
 James Arakaki, Hawaii County Council



BENJAMIN J. CATIFANO  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF FORESTRY AND WILDLIFE  
1151 PUNICHOONA STREET  
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MICHAEL G. WILSON  
COMMISSIONER  
DIVISION OF FORESTRY AND WILDLIFE

DEPUTY  
COMMISSIONER

ADMINISTRATIVE SERVICES  
ADULT RESOURCE CENTER  
COUNSELING SERVICES  
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April 14, 1997

MEMORANDUM

TO: Dean Y. Uchida, Administrator  
Land Division

FROM: Michael G. Buck, Administrator  
Division of Forestry and Wildlife

SUBJECT: Comments on Draft Biological Assessment for Saddle Road Realignment Project  
Division of Forestry and Wildlife Staff have reviewed the subject document and provide the following comments:

I. General Comments

The Division agrees with the proposed mitigation actions and the need to protect and restore additional habitat on the north side of Mauna Kea and elsewhere to ensure the long term survival of Palila. However, we disagree with the proposal on how best to implement these actions, particularly on State owned parcels. We recommend taking a different approach for some of these actions that would achieve the same end goals but do so in many instances at less cost and with less disruption of existing landowner and hunting community relations. The Division offers the following general comments on the mitigation plan.

1. The mitigation plan proposes that four parcels of state land (Bolello Hawaii Enterprises TMK 4-3-10-2, KK Ranch TMK 4-4-14-3, SC Ranch TMK 4-3-10-8, and Lau Ranch TMK 4-4-15-2) comprising 1,918 ha be taken out of cattle lease, fenced and domestic and feral ungulates removed and control efforts be monitored and continued for 3 years. The mitigation package should not look at the acquisition of these parcels in a vacuum but should consider what is happening on adjacent DLNR lands and habitats. For instance, the adjacent lands DLNR lands are being managed for Palila habitat, forest protection, and game management-typically bird hunting. The Division proposes that a more sustainable long term management approach would be to retain cattle leases on these areas, work with the lessees and manage cattle at an appropriate level and method to allow regeneration of mamane/naio forest while controlling noxious exotic vegetation. The mitigation plan should incorporate grazing as a fuel mitigation measure. This approach will provide noxious vegetation control, fire control, retain hunting opportunities and reduce costs.

2. The mitigation plan proposes that feral ungulates be removed from managed parcels by agency or contract hunters. The mitigation plan should incorporate public hunting as the first option for all animal control efforts. To achieve the desired goal of ungulate control, the Division proposes adopting a more sustainable long term management approach of using public hunting to control ungulates at low, acceptable levels. This will provide recreational hunting and reduce costs.
3. The mitigation plan proposes that considerable fencing be done to control domestic cattle and feral animal grazing to enable mamane/naio forest regeneration. Rather than fencing complete boundaries of all areas to achieve this goal, we recommend a general approach of strategic fencing taking advantage of natural barriers, existing DOFAW sheep fences, and existing cattle fences where appropriate and only fence those areas where sheep are a serious problem. We do not believe that sheep are that severe a problem in the Puu Mali or Lau Lease area. The Division proposes a more sustainable long term management approach that would: 1) rely on existing cattle fences and better cattle management where appropriate, 2) control sheep in appropriate areas by public hunting, and 3) use strategic placement of sheep proof fences to protect quality forest areas. This will reduce the amount of new fencing needed, reduce costs and provide additional recreational hunting.
4. The mitigation plan does not propose reforestation as a management action to speed mamane/naio restoration. Cattle rather than sheep appear to be the main limiting factor for mamane/naio regeneration in the lease areas. To speed-up the reforestation process, the Division proposes implementing an active mamane planting program in association with the cattle management strategy to restore appropriate areas of the State lease lands. Reforestation would target areas with natural barriers to cattle such as gullies or kipukas and could also be combined with some strategic fencing to produce corridors and islands of mamane/naio forests.
5. The mitigation plan proposes that the management of the (2,833 ha) 2,568 ha of state lease land be undertaken jointly by the FWS and DLNR. DLNR as the land owner is the appropriate agency for management and would contract out specific work items to BRD or other parties as needed to implement the plan. The agreements would be between DLNR and funding agency to accomplish the mitigation actions. This may result in a considerable savings to the funding agency in that DLNR would not add a 25% overhead for managing the project but would contract out jobs and require overhead on a limited items such as positions added to the Division personnel counts. Substantial savings could be achieved if DOFAW carried out some of the proposed mitigation actions instead of the FWS. Estimated savings on lease relocations costs, fencing, ungulate control, predator control, weed monitoring and USFWS overhead expenses could amount to over 1 million dollars over the next five years (see attached table 8).

II. Specific Comments

1. Page 26. Para 1. The mitigation plan states that acquisition and management of 1,864 ha of state grazing leases in Puu Mali areas is necessary. The goal is to restore forests in this area. Acquisition is not necessary to do this. A more sustainable approach to achieve the goal of forest restoration in this area is to retain a cattle lease option on the land and manage cattle at an appropriate level and method to allow regeneration of mamane/naio

Saddle Road Mitigation Plan: DLNR/DOFAW General Concepts for Management

1. Not look at mitigation parcels in a vacuum but in context of management of adjacent lands and habitat by DLNR or other land management entity.
2. Utilize public hunting as a first option for all animal control efforts.
3. Utilize grazing as a fuel mitigation strategy.
4. Utilize strategic fencing and natural barriers rather than complete enclosure fencing to control feral ungulates.

2. forest while controlling noxious exotic vegetation.  
Page 26. Para 2. The mitigation plan states that habitat restoration for palila cannot succeed unless domestic and feral animals are removed. We disagree. Domestic livestock can be used as an important management tool as discussed above. Grazing animals can be used effectively to control noxious exotic vegetation in native ecosystems that have been previously altered by detrimental land use practices. Properly managed livestock herds are also beneficial to game bird populations. Grazing at the proper time of the year (when grass is green and growing) and for short durations (a few weeks or months each year) will not significantly impact the overall recovery of damaged mamane/naio forests and will help control weeds and fire fuels. The trade off is a small loss of trees to cattle that will be compensated for by weed and fire control. The plan does not mention the increased risk of fire as a result of total ungulate removal. The Division plan discussed above mitigates this threat by using periodic cattle grazing.  
Page 26. Para 2. The mitigation plan advocates extensive fencing and agency or contract hunters to control ungulates for forest regeneration. Not all areas should require new perimeter fencing. Adequate domestic and feral ungulate control may be achieved using existing cattle fences for cattle management and public hunting to reduce sheep levels to a low enough level for forest regeneration. Ungulate control can be done using public hunting and DOFAW staff control where necessary rather than contracting NPS or other agency staff for this function.
4. Page 26. Para 2. See comments on fencing and reforestation above (items 3-4).
5. Page 30. Para 1 & 2. The management approach proposed by the Division in Section I above would result in some savings for the costs of lease withdrawals, metes and bounds surveys, fencing, ungulate control and predator control. See comments and information provided in Section I.
6. Page 30. Para 3. The mitigation plan should consider the increased fire risk from ungulate removal and incorporate a management approach as suggested by DOFAW to reduce this threat.
7. Page 36. Para 1. The mitigation to move the *Silene hawaiiensis* will also require coordination with DOFAW and a state permit.
8. Page 46. Para 1. The mitigation plan proposes fencing 10 kipukas identified in Table 11. No fencing specifications, size or cost estimates are provided. The Division would like to review proposed fencing to integrate with state management of those lands.

Please give Mr. Paul Conry a call at 587-0166 if you require additional information on these comments.

cc: Hawaii District  
Paul Conry

BENJAMIN J. CASTRANO  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF FORESTRY AND WILDLIFE  
1151 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813

April 18, 1997

MICHAEL D. WELSON  
Commissioner  
BUREAU OF LAND AND NATURAL RESOURCES

REPORT  
OLEBERT S. COLONLAGUAN

ADMINISTRATIVE DEVELOPMENT  
PROGRAM  
APPLICABLE TO THE  
CONSTRUCTION AND  
OPERATION OF THE  
SADDLE ROAD  
PROJECTS  
FOR THE STATE OF HAWAII  
LAND MANAGEMENT  
DIVISION  
WATER RESOURCE MANAGEMENT

MEMORANDUM

TO: Dean Y. Uchida, Administrator  
Land Division

FROM: Michael G. Buck, Administrator  
Division of Forestry and Wildlife

SUBJECT: Comments on the Draft EIS for the Saddle Road Realignment Project.  
The Division of Forestry and Wildlife Staff has reviewed the subject document and provide the following comments:

GeneralComments.on.Hunting

Some of the proposed highway alignments will remove acreage from existing game management areas; subsequently reducing their value for hunting. Additionally, certain alignments will trigger pallia mitigation measures which will exclude game mammals from potential hunting areas. There should be some compensation for the loss of public hunting areas. This compensation should include funds for improvements of existing game management areas or the opening of adjacent lands currently not available for public hunting.

GeneralComments.on.Fire

Attachment 1. is a draft of the Mauna Kea Fire Plan that addresses DLNR's concerns on fire. PTA is currently or will soon drill for water in the area. DOPAW would like to see PTA incorporate stand-pipes in areas with high flammable fuels, i.e. PTA's boundary with Mauna Kea Forest Reserve and Kaohe Game Management Area. This would allow fire fighters the ease of accessing water and also allow PTA to sustain their 80,000 gallon water tanks at capacity level without the need of hauling water to the tanks.

Dean Uchida  
April 18, 1997  
Page 2

1.2.Paragraph.3.

The Saddle Road also serves access to the state's major hunting areas on Mauna Kea, Kaohe, PTA lease, Mauna Loa, Kipuka Ainahou, Hilo Forest Reserve, and Upper Waialea Forest Reserve.

2.1.Design.Parameters.....Build Alternatives

A discussion on developing off-ramps for hunting access could be made in this section.

2.2.1.Segments.under.Consideration - Section.I

An upgrade of EX-1 could be discussed as an alternative to cutting new routes through Keamuku.

Table 2.2.3.-Alternative.B.3.Comparison.of.Action.Alternatives

Should mention that by using existing routes, this alternative minimizes disturbance to hunting areas.

2.3.2.2.Segments.....Consideration - Section.II

PTA-1 causes the biggest disruption to an important public hunting area adjacent to the state park.

3.1.1.1.2.Military

Many of the limitations listed here are lease stipulations that will continue in effect for training areas until year 2029.

Table.3.1.1.Land.Use.by.Segment - Section.II

Hunting for game birds and mammals should be added to all three "Land Use" segments described in section II of this table.

Page.3.7.Paragraph.3

Maneuvers in state lease lands will still have lease covenants regarding training. (Reference: S-3849, 22, 971.00 acres, expires 8/16/2029).

Dean Uchida  
April 18, 1997  
Page 3

3.1.1.3. Mitigation Measures

Access to hunting areas should be maintained during and after construction phases.

3.1.3. Governmental Plans, Regulations

Reference to State Lease 3849 should be made as a Land Use Regulation as it prescribes military activities on PTA leases.

3.3.3.2. Environmental Consequences, Paragraph 8

The EX-2 alignment in areas 1-4 is preferred by certain hunters and bird watchers. A discussion on the Army's development of the eastern Redleg Road area to accommodate expanded training should be presented.

3.3.4.2. Environmental Consequences, Page 3-42

Routes PTA-1 and PTA-3 in areas 1-4 would not only cause game disruption but actual significant acreage loss to hunting areas.

Page 3-43

Routes W-2 and W-3 could interfere with hunting area mitigation options in Keamuku that has been discussed in public meeting with hunters.

3.18.3. Mitigation Measures, Section 11

DLNR supports restoration of mamane forests and palia habitat on these lands but is interested in taking the lead management role on any state lease lands involved in mitigation. The management of these lands should be integrated with adjacent state forest reserves, involve public hunting for any ungulate control activities, and maintain the option of using controlled grazing as a management tool to reduce wildland fire risks.

C: Hawaii District  
Paul Conry

Attachment

**2. Ranch Lands**

Except for the southwest section adjoining PTA, Mauna Kea is bounded by ranch lands. Cattle grazing has prevented the build up of fire, grassy fuel, and the overall chances of intense, rapidly spreading fires occurring under the current use are low. Three of the 4 fires documented within the ranch lands burned 7 acres or less, and one burned 200 acres in an area 4 1/2 miles down slope that supported moderate growth of bunch grass. Nonetheless, fires within these surrounding areas should be considered potential threats. DOFAW, as a cooperator to HCFD, responds to all fires in this area.

DOFAW needs to be cognizant of the Department of Hawaiian Home Lands plan to subdivide their current pasture leases between Hinunui and Keanakolu into homestead lots. Changes in the type or nature of uses could have an effect on the adjacent Mauna Kea lands.

**3. Saddle Road**

The County of Hawaii owned Saddle Road runs close to, and through a portion of the southwest section. It is only minimally maintained, with heavy grass growth literally encroaching upon the pavement in places. It presents a ready source of ignition from car fires (one recorded), catalytic converters, exhaust sparks, and carelessly discarded burning material. Four of the recorded fires, including the two largest that burned a total of 4,199 acres, were caused by traffic on the road.

Planning is in progress for the realignment of the Saddle Road. Of major concern from the fire management standpoint is that section of proposed alignment within PTA approximately from Puu Nene to Puu Keekae, which would put the new roadway right up to, and/or on the slope of the mountain. The natural barrier currently provided by the barren lava flow on the eastern end and the firefighting advantage offered by the flat lands separating the existing roadway from the slope between Pohakuoa and Puu Keekae will be lost. Based on available information, the Army is adamantly pursuing the project, and there is strong political support for it at all levels. It is apparently considered a "get it fly" project. DOFAW and all others concerned with the protection of the area must hold firm in demanding adequate safeguards against fires starting from the new road. Generally, without knowing the specific alignment to be followed, mitigating measures would include wide fuel free shoulders with barriers preventing vehicular access onto grassy areas, paved turn-out/parking areas for at least 4 vehicles no more than 1/2 mile apart to accommodate roadside parking for hunters and other forest users, and the establishment and maintenance of a

fuel free corridor on the upslope or north side of the roadway that will effectively prevent traffic caused fire ignition.

4. Halepohaku Middle-Land Support Facility

The facility is located at approximately 9,200 feet elevation on 19 acres at the site of the former Halepohaku Ranger Station and Mauna Kea State Park. Currently, wildfire would not pose a significant threat to the facility. Their fire station would have limited capability for wildland fire suppression, that may be applicable to controlling fires starting in the vicinity.

5. Overhead Powerlines to Halepohaku

The powerline extends approximately along the Hamakua and North Hilo District boundary from near the Army's "Infantry Road" up to Halepohaku. The powerline, approved contrary to DOFAW's concern and recommendation, poses a potential, if not serious, risk of ignition if there should be a powerline failure. Fires starting along this isolated and rugged alignment could become a potential disaster, with the rapidly increasing grass cover and accumulation of fire fuel in the alo-mamane fuel type area.

III. EXISTING CONDITIONS

A. Geography

Rough and irregular terrain with average slopes of up to 30 percent and more severely restricts fireline construction with bulldozers over a significant portion of the area. The altitude, starting at 5,500 feet on the low end, extends up to 9,500 feet and more in some potential fire areas, significantly reducing the efficiency of helicopters performing water/retardant drops. The geographical influence of air currents are often unpredictable, and adds to the difficulty and hazards of air operations. The rugged terrain combined with high altitudes creates a situation that is taxing on firefighters' physical capacity.

B. Weather

1. Precipitation

Rainfall data for 5 locations around Mauna Kea (identified on map) that most closely represents precipitation within the area is provided in Table 1, and graphically illustrated in Figure 1. Although it includes data through 1966 only, it is the only comprehensive compilation of rainfall data available for the area. As it covers a minimum 26 year period at Halepohaku up to 31 years at Pun Kihē, it should adequately represent the long-term trend.

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
Land Division

April 23, 1997

Ref: DLM-GYT97-10181

MEMORANDUM

To: Dean Y. Uchida  
Administrator

From: Glenn Y. Auuchi

Subject: Saddle Road Realignment Project

I have reviewed the Biological Assessment of the Preferred Alignments and the Preliminary Draft Environmental Impact Statement for the subject project and these are my comments.

Biological Assessment

Page 26. After discussion of the Kipuka Alala area, the rest of that paragraph (beginning with "For habitat restoration to succeed within the areas identified above...") should form a new paragraph to indicate that the comments regarding fencing and ungulate control apply to both the Kipuka Alala and Pu'u Mali areas.

The discussion on ungulate control should include the following: Domestic ungulate control should be done in coordination with the respective rancher. Feral ungulate control should be done through a controlled hunting program.

Page 30. It is recommended that the management of the Pu'u Mali and the "Lau Ranch" site be solely under the jurisdiction of the Division of Forestry and Wildlife. Appropriate funding from FHWA, DOD, etc. for that portion of the mitigation plan to be implemented by DOFAW should go directly to DOFAW.

Should there be a need to withdraw the Pu'u Mali area from the existing general leases, subdivision cost i.e., survey cost, subdivision fees, etc., should be considered.

Should control and management of the Pu'u Mali area be to other than DOFAW, a separate parcel of record would be required. Subdivision requirements, their cost and time implications should be factored into the time matrix.

Again, any discussion on ungulate control should include the following: Domestic ungulate control should be done in



Par. 3.1.1.1.8, page 3-4. Regarding outdoor recreation areas, should any portion of the Mauna Kea State Recreation Area be required for the subject project, said area must be withdrawn from the executive order which is under the control and management of the Division of State Parks.

Par. 3.1.1.1.3, page 3-8. Regarding the use of Saddle Road, would the transport of telescope lenses to any of the observatories on Mauna Kea be restricted during construction. If there is uncertainty, the University of Hawaii, Institute of Astronomy should be consulted on this matter.

Par. 3.18.3, page 3-143. Regarding the Memorandum of Agreement (MOA) between USFWS, DOFAM and FWA, will there be an end date to the MOA? Will there be a funding guarantee until the expiration of the MOA? At the expiration of the MOA, can the use of the property revert to ranching or other uses as deemed appropriate by the BLMR?

What agency will be responsible for the long term monitoring of the Silene hawaiiensis?

Should there be any questions on this matter, please see me.

coordination with the respective rancher. Feral ungulate control should be done through a controlled hunting program.

Funding sources should be identified for any cost attributed to the taking or withdrawal of lands currently under lease to the respective ranchers. Funding sources and the method of payment (i.e. lump sum, yearly, etc.) for the lost revenue to the State of Hawaii and to the lost entitlement to the Office of Hawaiian Affairs should be identified and addressed.

Regarding Palila translocation, what happens if after numerous attempts the Palila fail to settle in the Pu'u Mali area? Should translocation fail, the land should revert back to ranching purposes or other such purposes as may be deemed appropriate by the BLMR.

Note: Copies of the general lease documents which contain language allowing for the withdrawal of portions of the encumbered lands and the compensation for improvements taken, if any, were provided to the consultants.

Page 36. The second paragraph states that "to avoid the potential downing of Dark-rumped Petrels and Newell's Shearwaters by their interaction with external construction lighting, no construction or equipment maintenance will be permitted after dark between the months of April and October." Could a space i.e. empty hangar, warehouse, etc., within PTA's built up area be made available for the contractor's emergency repair work?

Page 37. Concerning the spacing of staging areas, a construction company should be consulted to determine the proper spacing of the staging areas along the route of the entire Saddle Road Realignment Project. A consideration should also be given to creating an environmental, etc. checklist of required studies to be completed and approved prior to allowing additional staging areas along the route.

Preliminary Draft Environmental Impact Statement

Par. 3.1.1.1.4, page 3-3. Any withdrawal of lands from Forest Reserve status requires action by the BLMR, consent of the Governor of Hawaii, a public hearing for the purpose of withdrawal, the issuance of an executive order which provides for rights of disapproval by the legislature.



DEPARTMENT OF THE ARMY  
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII  
SCHOFIELD BARRACKS, HAWAII 96857-5000  
April 24, 1997

REPLY TO  
ATTENTION OF

Directorate of Public Works

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
555 Zang Street, P.O. Box 25246  
Denver, Colorado 80225

Dear Mr. McCauley:

Please find enclosed preliminary comments by members of the staff of the U.S. Army Garrison, Hawaii and also, our Major Command (U.S. Army Pacific, Deputy Chief of Staff for Engineering). These comments are provided for both the preliminary Draft Environmental Impact Statement (PEIS) and the Draft Biological Assessment (BA) for the proposed realignment of Saddle Road (Hawaii State Route 200) on the island of Hawaii.

These comments are presented to meet the needs expressed during a preliminary meeting held on April 9, 1997, at the Federal Building in Honolulu. The Army's comments are primarily restricted to those sections of the road that pass through the Pohakuloa Training Area.

These comments reflect a multiple review by various offices without the benefit for an in-depth analysis of some issues. A more rigorous and thorough review is underway. These additional comments will be forwarded shortly.

We feel that with the exception of the omission or exclusion of Army participation in the development of agreements to "manage lands" that may be fenced as part of proposed mitigation (PEIS pages 3-144). The plan, as written, offers no substantive impediments to implementation. The proposed cost for the mitigation (BA page 32) is very high and the Army would like the opportunity to explore some consideration of activities which it has already undertaken to minimize the tabulated mitigation costs.

The Army looks forward to participation in subsequent review meetings on the above documents. The point of contact for these comments is Dr. Raino Liias, of my staff. He can be reached at 656-2878, extension 1042.

Sincerely,

Dennis J. Fontana  
Colonel, U.S. Army  
Director of Public Works

Enclosures

Copy Furnished:  
Commander, U.S. Army Pacific, ATTN: AFPH-F Fort Shafter Hawaii 96859-5100

Comments from Dr. Raino Liias, Chief, Environmental Division, Directorate of Public Works

1. Page 2-2, Figure 2.11: Typical Section B is mislabeled. Termination of segments where Section B and Section C would be used are not indicated on Fig 2.23. Where this information is located would be a useful cross reference.
2. Pages 2-5 to 2-6: Do all costs represented include the typical sections as presented in Fig. 2.11?
3. Page 2-8: Alternatives B-4, B-8, C-4 and C-8 are preferred routes of the Army. The central issue is the utilization of route PTA-1 through PTA proper. The Army expresses no preference for the segments running through Section I, III and IV.
4. Page 3-2: The Army is not now drilling a water well. The Army is pursuing options, including the possibility of drilling a well, to provide for potable water at PTA to alleviate the current necessity to haul in potable water via truck.
5. Page 3-2: Recommend changing next to last paragraph sentence to "limited in their use pending resolution of environmental considerations and because of extremely rough terrain."
6. Page 3-2: Last paragraph - profile reference to Training Area 1-4, specifically to a map!
7. Page 3-80: Section 3.9.3, second bullet, add ... One new 2,000 gallon tanker truck.
8. Page 3-116: Section II - The fire mitigation plan as cross referenced is understood to be no more than increased fire break built as part of the road and the Standard Operating Procedure of the U.S. Army's PTA Fire Department.
9. Page 3-121: Section II - Was the "incidental observations" made by one individual or several? Observation by a trained specialist or botanist?
10. Page 3-319: Paragraph 3 - Reference is that a "Palila was recorded... during the course of the biological studies". Reference to page 3-121 where it is stated "incidental observations during the biological study". Are these separate studies? Separate sightings by biologists or by botanists?
11. Page 3-139: Are all recent sightings within the last five years - by the same person, group? Where is this information available?

Comments from Mr. Larry Itirai, Environmental Division, Deputy Chief of Staff for Engineering  
U.S. Army Pacific

1. Per our discussion on Thursday, March 27 1997, the following comments are provided on the document:
  - a. This is a difficult and complex action to evaluate due to its trans-island route through many different habitats with different landowners/lease holders using the land for different purposes. Confer with evaluating impacts by dividing the project route into the western, PTA, and eastern sectors.
  - b. The preliminary DEIS indicates discussions, actions, and mitigative measures have been worked out. The relevant correspondences should be incorporated into the DEIS in an appendix section, especially for actions related to endangered species and historic sites.
  - c. The DEIS should also include in an appendix section the minutes of the scoping meetings and letters received/responses provided on this project. Minutes of task force and other related meetings should also be incorporated to reflect the openness of this process and involvement of agencies and the public in determining and evaluating impacts.
  - d. Actions, and especially mitigative measures, discussed for PTA seem to imply Army concurrence/approval. This may or may not be correct. For example, Palila restoration research is ongoing. Palila introduction at PTA still requires MACOM and HIQDA reviews and approvals.
  - e. The preliminary DEIS, and when available the DEIS, should also be reviewed by our SJA and USARUAW.
2. Thank you for the opportunity to review and comment on the document. I look forward to reviewing the DEIS when it is available.

Per the meeting at Senator Inouye's office on Wednesday, April 9 1997, the following comments are provided on the environmental documents for the Saddle Road project.

12. Page 3-144: Third bullet - replace paragraph with "The Army is conducting a baseline weed and insect survey for PTA as part of its Ecosystem Management Plan at PTA and other Army controlled lands in Hawaii. The U.S. Army Garrison, Hawaii, will support control and monitoring efforts by the owners of State Route 200 (Hawaii DOT). The Army cannot provide long term control on the state route right-of-way.
13. Page 3-149: Section II - Replace with "a fire management plan has been developed by the U. S. Army Garrison, Hawaii, which includes response procedures and suppression resources in place for Ecosystem Management in the PTA area. Fire mitigation is primarily accomplished through the construction of an increased road width as shown in typical cross section C7 as shown in Fig 2.1.1, which is to be provided through project funds.
14. Page 3-144: First bullet - The Army insists that any measures to fence or manage restoration efforts on the acreage within the current boundaries of PTA be its own responsibility. Agreements that do not include the Army will have no binding effect on the Army. The Army has already undertaken numerous efforts to address biological, botanical and other natural and cultural resources located on Army-controlled lands.

Preliminary DEIS. Comments were provided earlier and are listed below.  
Biological Assessment (BA) of the Preferred Alignments for Saddle Road.

1. Conflict of Interest. There is the appearance, if not in fact, a conflict of interest when it is Fish and Wildlife Service (FWS) dictating what has to be done for the Saddle Road project to proceed and then receiving funds to do the "mitigation work." A regulatory agency is profiting from the required consultation. The DA should be crafted such that the required mitigation measures will be done, and done by qualified staff and contractors, not necessarily FWS or sister agencies.
2. Page 5, 2nd paragraph. It is stated that phased construction of this project could commence as early as Fall 1998. Before this can occur there are many important mitigations that need to be done for a no-jeopardy biological opinion (BO) from FWS. Parties responsible for funding and actually accomplishing need to be clearly known. Commitments need to be secured. It should also be clarified with FWS if the project may proceed even if certain mitigations are not completely done, such as acquisition of Lau Ranch for Palila restoration work.
3. Location Maps. For reference purposes, there should be an overall map showing the different discussed locations - Puu Maau, Puu Mali, Kipuka Aiala, Lau Ranch. Location maps can then be referred to during specific discussions.
4. Mitigation Costs Tables. Tables for biological mitigation costs are only provided for the alternative routes in Section II (PTA). For comparison purposes, tables should also be developed for Sections I, III, and IV. Tables should also reflect agencies or offices with primary responsibilities to fund and/or fulfill the various measures.
5. Other Tables. For ease of comparison, the Section I, II, III, and IV tables for area/vegetation types disturbed by the different route alternatives should be placed in one section or appendix. This would also apply for the biological mitigation costs tables for Sections I, II, III, and IV.
6. Page 21, 4th paragraph, last sentence. Seems contradiction in stating that alien insect species do not directly effect *Cydia* caterpillars but most certainly reduce caterpillar availability for Palila use.

7. Page 35, Other Mitigation Section. There is a need to collect and store *Silene hawaiiensis* plant propagules. The DA indicates this will be done by the PTA Environmental Office. It is unclear if this will mean the Army will need to establish a greenhouse or nursery. USARPAC has already nonconcurred with this endangered species conservation approach. Instead, USARPAC recommended and still recommends that the installation work with other agencies and develop cooperative agreements in this area.
8. Sections III and IV Proposed Mitigation. Construction will begin on the western end of the segment and proceed east to minimize the spread of noxious and alien species. This will result in greater construction cost and time required to complete the project. The contractor should be given a greater degree of flexibility, especially since the construction equipment and material will be "sterilized" free of alien species before being allowed entrance to the job site. At least the contractor should be allowed to conduct construction activities in a similar type of habitat within Sections III or IV (and not just from west to east).



## United States Department of the Interior

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In Reply Refer To: Saddle Road Draft EIS (NARS)

MAY 02 1997

Larry C. Smith, P.E.  
Division Engineer  
U.S. Department of Transportation  
Federal Highways Administration  
Central Federal Lands Highway Division  
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RE: Draft Biological Assessment of the Preferred Alignments for the Saddle Road (State of Hawaii Route 200), Island of Hawaii, Hawaii, and Preliminary Draft Environmental Impact Statement for Hawaii State Route 200, Mambalaha Highway to Milepost 6, Saddle Road

Dear Mr. Smith:

The U.S. Fish and Wildlife Service (Service) has reviewed your letter dated March 11, 1997, in which you requested our comments on two reports, the *Draft Biological Assessment of the Preferred Alignments for the Saddle Road (State of Hawaii Route 200), Island of Hawaii, Hawaii* and the *Preliminary Draft Environmental Impact Statement Hawaii State Route 200, Mambalaha Highway to Milepost 6, Saddle Road*. The Federal Highways Administration, Federal Lands Highway Division (FHWA), in cooperation with the State of Hawaii Department of Transportation and administering with the U.S. Department of Army, Military Traffic Management Command, is proposing to upgrade Saddle Road to acceptable American Association of State Highway and Transportation Officials standards, allowing its addition to the State highway system. The portion of the road proposed for improvement has been divided into four sections: Section I from the junction with HI90 East to Saddle Road Milepost 42, Section II from Milepost 42 to Milepost 28, Section III from Milepost 28 to Milepost 10, and Section IV from Milepost 10 to Milepost 6.

The Service offers the following comments to your agency in developing the Draft Environmental Impact Statement (DEIS) and Final Biological Assessment (BA) for the project. These comments are provided as technical assistance to your agency in identifying (1) accurate information on fish and wildlife resources in the project area, (2) potential impacts to fish and wildlife resources from the proposed project, (3) and mitigation measures that the Service deems necessary to avoid and

Comments from LTC Mues, Pohakuloa Training Area, Community Commander, U.S. Army Garrison,  
Hawaii

1. The Silene hawaiiensis population does seem a bit open-ended. A clarification of just what our obligation is and will be is needed. Who will fence and monitor the population during construction? How many seedlings/propagules will be needed and where will they be planted? Will there be a required "success rate" for outplanting?

2. No funding is included for maintenance of fences or construction of firebreaks around fences with regard to the Palila mitigation plan (pages 31 & 32). Again, possibly those costs could be included in the MOA or MOU.

3. Discussion of possibly allocating \$625K for "ungulate control" and this, no matter what we do, will be unpopular with the hunters. We need to pull that force in to the equation and have them help in drives, hunting, etc. We should not rely on "staff control" of animals until absolutely necessary.

4. All and all, I believe the mitigation package that we (the Army) will be forced to accept is both workable and the potential ultimate pay-off with range ten in the out years make acceptance of the road plan a necessity. If we can't continue to develop range ten, a case could be made in about ten years that there might not be a mission essential need for PTA. We must be looking ten to fifteen years out and with the advancement that force XXI is bringing at us, we must continue to develop the northeastern portion of PTA.

5. I have talked with Scott and told him that EOM May is the "drop dead" date for our turning over to USF & WS the three packages they wanted: Fire Plan (you were handling), Saline II, plant protection, propagation, and the weed and insect plan. Scott knows to coordinate directly with Alvin, Karen from USF & WS, Reggie David, Ken Owl at DOT, Paul Banko & DLNR. I also covered it very clearly that other than the fire plan, both the plant and the weed/bug plan, after coordination must be turned in to Mr. David and Okahara and Associates. If we don't make EOM May at the latest, I could see the project falling off of critical path.

minimize these impacts. Provision of these comments does not fulfill the Service's responsibilities under the Endangered Species Act of 1973 [16 U.S.C. 1531 *et seq.*; 87 Stat. 884], as amended, and the Fish and Wildlife Coordination Act of 1934 [16 U.S.C. 661 *et seq.*; 48 Stat. 401], as amended, or the Department of the Interior's (DOI) responsibilities under the National Environmental Policy Act of 1969 [42 U.S.C. 4321 *et seq.*; 83 Stat. 852], as amended (NEPA).

#### **GENERAL COMMENTS**

The original reports by the botanical and invertebrate consultants are not included in the Draft BA or the Preliminary DEIS, and the Service has not been otherwise provided with these reports. In order for us to assess the adequacy of the information provided on these plant and invertebrate resources, the Service requests that we be provided with a copy of the original reports. We also recommend that the FHWA consider making the reports available to the public by including them as appendices to the DEIS.

Potential adverse impacts to nene, dark-rumped petrels, palila, 'Akiapola'au, Hawaii creepers, Hawaii akopas, and Newell's shearwaters as a result of an anticipated increase in mammalian predators (e.g., mongoose, cats, rats) and potential adverse impacts to federally listed plants from possible increased rat predation should be addressed in the BA. The DEIS should include a discussion of these same effects on federally listed species as well as other native fauna (e.g., other forest birds) and flora (e.g., Species of Concern (SOC)).

None of the plant or invertebrate SOCs are discussed in the Draft BA, and some are only briefly mentioned in the Preliminary DEIS. Because of the scope of the project, it is anticipated that the planning and construction phases will span several years. It is likely, therefore, that some of the SOCs will become candidate, proposed, or listed species by the time the project is completed. While it is not mandatory during section 7 consultations to include SOCs, the Service recommends that they be included in the BA and addressed as a part of this consultation in order to reduce the possible need for re-initiation of the section 7 consultation process in the future. Adverse impacts to SOCs and other native wildlife should be given full consideration as part of the NEPA process. Therefore, the DEIS should include a discussion of impacts to these resources and identify mitigation measures to avoid and minimize these impacts.

The Draft BA and the Preliminary DEIS do not indicate where staging areas will be located along the proposed routes in any of the four sections of the Saddle Road improvement project. Any areas that will be used for staging or equipment/material storage should be identified on maps and evaluated to determine if use of these areas will result in adverse impacts to native fish and wildlife or habitats. Mitigation to minimize any identified impacts should include an alien species monitoring and control plan and implementation of the same measures recommended as mitigation to minimize impacts to kipuka.

The Service believes that more discussion should be given to the impact of the road through Palila critical habitat. Information should be disclosed regarding the details of this legal definition and

analysis should be made addressing potential impacts of the road on the primary constituent elements of the critical habitat. The Service would like to see a discussion of the potential impact that dissection of critical habitat might have on the Palila.

Several of the maps in the Draft BA and the Preliminary DEIS are difficult to read. Some figures in the Preliminary DEIS are missing legends, making interpretation impossible. The same base map should be used for all figures, with the specific areas to be depicted in each figure enlarged. This would enable the reader to follow the same landmarks from map to map.

#### **SPECIFIC COMMENTS**

##### **a. Draft Biological Assessment. Introduction.**

Page 5. The Draft BA states that the proposed improvements would provide a two-lane highway to accommodate the projected traffic volume through the year 2014. It is unclear, however, what methods will be used to improve the existing two-lane highway to handle the projected traffic, and it is not stated that the projected traffic volume is anticipated to increase from the existing conditions. The improvements to be made, such as straightening and widening of the highway, should be specified in the BA or referenced to the appropriate section of the DEIS. Since these improvements will result in increased traffic volume and speed limits, these changes and the effects of the changes on listed plant and animal species should be addressed in the BA and the DEIS. In particular, for the nene, the BA should include information on the present nene collision mortality rates along the Saddle Road and the anticipated collision mortality rates with the improvements that are proposed along all four sections of the road. The BA and DEIS should identify mitigation measures to avoid or minimize any impacts identified.

##### **b. Draft Biological Assessment. Section II: Discussion of the Potential Impacts To Listed Species. Palila.**

Page 21. A reference is needed for the statement that the Argentine, big headed, and *Cardinomyia venustula* ants are not believed to directly affect *Cyrtus* caterpillars, a primary food source for Palila.

##### **c. Biological Assessment. Section II: Proposed Mitigation. Palila Mitigation Plan.**

Page 25. The BA should clarify that the modification of 30 hectares of palila critical habitat applies to the PTA-1 option, while the modification of 34 hectares applies to the PTA-3 option, as is stated in the Preliminary DEIS on page 3-141.

**Preliminary DEIS, Chapter 3 - Affected Environment, Environmental Consequences, and Mitigation Measures.**

**d. Section 3.5.2.2.2 - Other Relocations.**

Page 3-64. The DEIS states that several buildings within the PTA cantonment will need to be moved if either PTA-1 or PTA-3 is identified as a selected segment in the preferred alternative. It is difficult to identify the relocation areas from the description in the Preliminary DEIS (on the west side of Pu'u Pohakuloa outside of the Army Airfield's safety zone), and there is no map referenced. This section of the DEIS should clearly identify proposed relocation areas and any important biological resources that may be impacted by the relocations. If information on endangered and threatened species and other sensitive resources is currently lacking for these areas, surveys should be conducted to determine if the proposed relocations could adversely affect these resources. The Service is particularly concerned that the threatened plant *Silene hawaiiensis* may exist within the relocation area. Measures to avoid or reduce impacts to any important biological resources identified should be included in the DEIS. If individuals of *S. hawaiiensis* or other listed, proposed, candidate, or SOC species are identified, this information should be provided to the Service so that potential impacts to these species can be addressed during the section 7 consultation for this project.

**e. Section 3.11.3. Waters of the U.S./Wetlands.**

Page 3-88. The information provided on waters of the U.S., including wetlands, in the Preliminary DEIS is inadequate to the point that no meaningful assessment of impacts can be conducted. We recommend that information on the types and acres of wetlands potentially impacted by each alternative be included in the DEIS and that specific measures to avoid and minimize impacts to these resources be identified. As you are aware, early coordination among natural resource agencies is recommended and important in complying with the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA), which seeks to streamline the NEPA and the Clean Water Act Section 404 permit processes.

**f. Section 3.12.5. Speleological Resources.**

Page 3-97 - 3-101. The discussion of caves in this section of the Preliminary DEIS does not include information on the SOC invertebrate species that were documented in the caves during the invertebrate surveys conducted for the project. While this information is included in the Preliminary DEIS (Chapter 3 - Section 3.14.3 - Invertebrates), we recommend that a summary of this information also be included in the description of the Speleological Resources or a cross-reference statement be included to direct the reader to the more specific information on cave fauna in the DEIS.

More importantly, we recommend that the DEIS address potential impacts to cave fauna from the road project and identify mitigation measures to reduce impacts to caves supporting native fauna. Significant caves identified along the corridor should be avoided and measures to protect the native vegetation above the cave should be identified as mitigation to avoid impacting cave fauna. Also,

mitigation to minimize impacts to cave resources should include the same measures recommended for protection of kipuka and implementation of the alien species monitoring and control plans within the project area.

**g. Section 3.13 - Vegetation; Section 3.14 - Wildlife; and Section 3.18 - Threatened and Endangered Species. (Cross-reference Draft Biological Assessment Page 10).**

Page 3-105 - 3-137. The BA and the Preliminary DEIS acknowledge that there will be an increased likelihood of access and colonization of biologically important areas by alien plants, invertebrates, ungulates and other mammalian predators among other organisms. Potential impacts to these resources from alien plant and invertebrate introductions are discussed and measures to reduce these impacts are identified. However, the increased threats from ungulates and mammalian predators on biological resources, including endangered and threatened species, are not addressed, and no mitigation is identified to reduce the impacts of these threats. These sections of the BA and the DEIS should be revised to include a discussion on the potential effects of ungulates and mammalian predators on native species, including endangered and threatened species, and identify mitigation measures to minimize these impacts.

**h. Section 3.13.3. Mitigation Measures. (Cross-reference Draft Biological Assessment Page 37).**

Page 3-115 - 3-116. We request that the comprehensive manual outlining and discussing the environmental issues and specific mitigation requirements and procedures and the section of the *Specifications for Construction of Roads and Bridges on Federal Highways (FHWA 1996)* that addresses the cleanup of emergency spills, storage, and disposal of all petroleum products be provided to the Service for review prior to the issuance of the final EIS.

**i. Section 3.14.1.2. Environmental Consequences.**

Page 3-122. On page 3-7 (Section 3.14.1.2. Environmental Consequences) of the DEIS, it is stated that the development of an improved Saddle Road on EX4-A would substantially increase traffic volumes and increase pressure for the development of commercial services such as service stations or convenience markets. The Preliminary DEIS, however, does not address the potential indirect impacts of this increased development on native vegetation and wildlife. The Service is particularly concerned that increased development along this section of the road will increase the spread of alien species in the area and provide additional pathways for the spread of alien species to other more environmentally sensitive sections of the road. This issue should be addressed in this section of the DEIS. More importantly, mitigation measures should be developed and identified in the DEIS to minimize these impacts.

**j. Section 3.14.3.1.2. Insects and Related Arthropods.**

Page 3-128. The introduction to the section on insects and related arthropods states that the discussion of insects and arthropods is limited to SOCs and that "the list of Species of Concern

reflects endemic arthropods of note." The referenced list, however, is not included in the Preliminary DEIS. This information should be included in the DEIS. In addition, we recommend that the DEIS include a statement that invertebrates collected during the surveys but not yet identified to species may also be SOCs. If possible, we recommend that identification of the collected specimens be completed so that this information can be included in the DEIS along with measures to mitigate impacts to endemic species of significance.

**k. Section 3.14.3.2. Environmental Consequences.**

Page 3-130. One species of snail, *Leptachitina leptida*, found along the corridor in Section II is a SOC. The segments PTA-1 and PTA-3 of Section II represent one of only two localities where *L. leptida* is found. These areas also have the highest land snail diversity encountered on the survey. Within Section II (EX-2, PTA-1, PTA-3) construction could impact one of the populations of *L. leptida* and populations of other native snail populations. However, no mitigation is offered to avoid or minimize impacts to land snails. Mitigation should include a fire management plan to protect the area below Pu'u Aluhua, where the other population of *L. leptida* is found. Other mitigation efforts should include implementation of the recommended alien species monitoring and control measures in areas supporting native land snails, particularly monitoring and control of ants and other alien ground-dwelling arthropods.

Several SOC arthropods were also found on the surveys, mostly in sections II and III. As with *L. leptida*, no mitigation is identified to avoid or minimize impacts to SOC arthropods. In areas supporting SOC insects, we recommend that mitigation include the measures recommended for kipuka protection, ground-dwelling arthropod control, and fire control in accordance with the proposed fire mitigation plan.

**l. Section 3.18 - Threatened and Endangered Species. (Cross-reference Draft Biological Assessment page 8).**

Page 3-137. Information in the BA identifying significant species (endangered, threatened, proposed, and candidate) "occurring" in the project area and significant species "detected or known" in individual segments (Sections I-IV) is confusing. The information in the text of the BA should be clarified such that the reader is able to discern that 1) endangered and threatened plant species occur in the project area (adjacent or near the road corridor) but only a few of these will be directly impacted by the road project (located in road corridor or right-of-way). It would be beneficial in the DEIS to include tables of threatened, endangered, proposed, candidate, and SOC species known to occur in the project area within or adjacent to individual sections of the road and to include similar information on the Biological Resources map (Figure 3.13.1).

**m. Section 3.18 - Threatened and Endangered Species and Section 3.18.3 - Mitigation Measures. (Cross-reference Draft Biological Assessment Page 13).**

Page 3-138 and Page 3-144. There is no mention of *Portulaca sclerocarpa* in the BA, either in the discussion of listed plants in Section I of the corridor or in the proposed mitigation section. Section 3.18.1 of the DEIS states that a population of the endangered species *Portulaca sclerocarpa* was found within 15 meters of the corridor, at a location that may attract travelers for scenic viewing. However, there is no mention of mitigation efforts to protect this population during and after construction in the mitigation measures section (3.18.3). The DEIS and the BA should include mitigation measures for this species, as described for the population of *Silene hawaiiensis* at Pu'u Ma'au.

**n. Sections 3.18.1 - Threatened and Endangered Species; 3.18.2 - Environmental Consequences; and 3.18.3 - Mitigation Measures. (Cross-reference Biological Assessment Page 22).**

Page 3-138 -3-145. The BA and the Preliminary Draft EIS do not clearly or adequately address potential impacts of the Saddle Road project on all populations of *Silene hawaiiensis* in the project area. In the BA, the discussion on impacts to *S. hawaiiensis* should be included in the section entitled "Discussion of the Potential Impacts to Listed Species," rather than in the section entitled "Other Biological Impacts Identified," since *S. hawaiiensis* is a listed species. Both the BA and the Preliminary DEIS acknowledge the population of *S. hawaiiensis* located on the summit and south slope of Pu'u Ma'au and the population located within and close to the PTA-1 corridor; however, the third and largest population of *S. hawaiiensis* in the project area is not acknowledged in either the BA or the Preliminary DEIS. This third population includes approximately 5,000 individuals and is located just southeast of EX-2, the existing route of Saddle Road. This population represents the largest and healthiest population of *S. hawaiiensis* within PTA. The information on this third population of *S. hawaiiensis* should be included in the Final BA and the Draft EIS. Also, the endangered plant map in the BA should be corrected to reflect all three populations of *S. hawaiiensis*, and the BA and Draft EIS should include information on the number of individual plants in the Pu'u Ma'au population.

In addition on page 3-142 of the Preliminary Draft EIS, Section 3.18.2 - Environmental Consequences, clarification is needed on potential impacts of the proposed improvements along Section II of the road on all three populations of *Silene hawaiiensis*. Specifically, the DEIS should clarify that 1) implementation of PTA-1 or PTA-3 will directly impact the 70-plant population of *S. hawaiiensis* located within and close to the PTA-1 corridor and implementation of PTA-1 may also indirectly increase impacts to the Pu'u Ma'au population; 2) implementation of EX2 would not result in direct destruction of plants, but may indirectly increase the destruction of both of the smaller populations of *S. hawaiiensis*; and 3) in addition to alien plant and invertebrate introductions, fire is another serious threat to all populations of *S. hawaiiensis* (e.g., construction workers could start fires with cigarettes or idling equipment).



Since two identified routes in Section II (PTA-1 and PTA-3) will result in the destruction of *S. hawaiiensis* individuals, we recommend that a plan to offset the loss of these individuals be developed, with appropriate partners, funding, and time-frames for implementation specified. A commitment to implement a plan (beyond what is generally outlined and described in the Draft DA) should be included in the Draft EIS and the actual plan included as an integral part of the Final DA and as an Appendix to the Draft EIS. The plan should include the following:

- Collection of seeds (no other propagation method works for this species) prior to the beginning of construction. It would be prudent to agree on the mitigation for this species as quickly as possible, so that the seeds can be collected when available, probably in the next few months. With only 70 plants, it should be possible to collect seeds from all individuals that flower between now and the time construction starts in that area;

- Propagation of plants for reintroduction purposes. The viability of these seeds in storage is unknown, so they cannot be collected and held for any length of time. The Army is applying for a collection and propagation permit from the Service, which includes this species. Propagation of collected seeds should be initiated in preparation for reintroduction. Since the viability of these seeds in storage is unknown, any extra seeds (in addition to those seeds collected for immediate propagation) should be sent to National Tropical Botanical Garden to test standard storage methods and to National Seed Storage Laboratory in Fort Collins to test cryopreservation methods; and

- Suitable habitat (rocky outcrops, cinder, or palaoehoe cracks) for potential reintroduction of plants should be located in an area where threats will be or have been minimized. Since ungulates are a major threat to this species, the outplanting will need to occur within a fenced area. The fencing will require annual monitoring and maintenance. While the Army has plans to fence three areas within PTA to protect and restore native plants, only one of the three sites is potentially suitable for outplanting of *S. hawaiiensis*. The fenced areas planned at the Multi-Purpose Range Complex and Pu'u Ka Pele are not suitable because they do not have many rocky outcrops and because a closely related species, *Silene lanceolata*, occurs naturally in both of these sites (There is chance of hybridization occurring if these two listed species are grown side by side). The area to be fenced within Kipuka Kalawamauna (1300 acres) may be suitable but will have to be surveyed to determine if there are likely sites for reintroduction. Participants in this survey should include botanists from PTA, the consultants, the Service, and Colorado State University, if they are available and on Hawaii Island at the time of the surveys. Kipuka Kalawamauna has the most similar habitat to the plants found within the road corridor. If no suitable area is found within the Kipuka Kalawamauna fence, other potential sites within or near PTA will need to be surveyed. In addition to fencing for ungulate control, there will also need to be a detailed management plan which includes weed control, a fire

management plan, and monitoring. At a minimum, the site for reintroduction should be chosen before the mitigation costs are finalized, since the costs will increase if additional fencing is needed. The costs of this propagation and reintroduction and responsible parties should be specified and included in the mitigation costs of the project.

Under the existing conditions, there is frequent traffic along the Saddle Road in the area at PTA supporting the largest population of *S. hawaiiensis*, and thus, goats are relatively infrequent in the area. Military training is also relatively infrequent, since vehicle traffic along Saddle Road hinders training exercises, and there are no secondary roads in the area to allow troop movement to proceed around Saddle Road. If PTA-1 or PTA-3 is selected as a segment of the preferred route, the goat activity within the area of this large population of *S. hawaiiensis* may increase due to decreased traffic. Also, any change in the frequency of training activities in this area may have an impact on this population of *S. hawaiiensis*.

We recommend that this large population be monitored to determine if goat browsing increases after this portion of Saddle Road is no longer used by the public or if changes in the frequency of the Army's training activities in the area impact this population of plants. If monitoring does reveal increased impacts (which should be determined by the Service, the Army, and perhaps BRD), conservation measures would need to be identified and implemented to protect the population.

Mitigation identified in this section of the Preliminary DEIS does not include the measures generally described in the DA to minimize impacts to the Pu'u Ma'u population of *S. hawaiiensis*. The DA and Draft EIS should include measures to minimize impacts to this population since there is concern that construction and traveler use of the site for scenic viewing may indirectly impact this population. Specific information on the proposed fencing (such as the type and size of fence, the size of the enclosure, maintenance of the fence, and management actions within the fence, if applicable (e.g., weeding, removal of ungulates)) should be included in the Final DA and the DEIS. In addition, we recommend including collection of seeds and propagation, so that if this population is damaged during construction, propagated material can be used to replace the lost plants.

Finally, measures to prevent fires should be included in the Final DA and Draft EIS and implemented as part of the project to minimize impacts to all populations of *S. hawaiiensis* potentially impacted by the road.

**o. Section 3.18.3 - Threatened and Endangered Species. [Cross-reference Draft Biological Assessment Page 35].**

Page 3-144. Reference is made to the Army's PTA Fire Management Plan. The Service recently received a copy of the Fire Management Plan, but we have not completed our review of the plan. Additional comments on the adequacy of the plan to minimize the threat and impact of fire on native wildlife and habitats will be provided separately. In general, however, a Fire Management Plan for the Saddle Road project should include the entire project area including sections of the road through

PTA. The plan should include both sides of the road through PTA, since the vegetation types found in this area (mamane/naio, *Eragrostis* grassland, and *uncouweo* siltland) are known only from this area or are best represented in this area. It is likely that *Silene hawaiiensis* is present in areas within the latter two vegetation types in areas that have not been thoroughly surveyed, and fire is a threat to this species.

The Fire Management Plan should address the area of the road below Pu'u Ahumoa, since the only known populations of the snail *Leptocharina tepida*, an SOC, are found at PTA and the adjacent area near Pu'u Ahumoa. A large fire could spread into adjacent vegetation types, including the area of western PTA that is dense with endangered plants and only approximately 5 miles away (In 1994, the Kiupa Kalawamuna fire carried at least 5 miles.). The Fire Management Plan should be implemented during and beyond the construction phases of the project since an increased risk of fire may result from the anticipated increase in traffic. The Fire Management Plan should be included as an Appendix to the Final BA and the DEIS.

p. **Section 3.18.3 - Mitigation Measures. All Action Alternatives. [Cross-reference Draft Biological Assessment Page 36. Section II: Proposed Mitigation. Other Mitigation.]**

Page 3-144. Reference is made to a comprehensive weed and alien insect monitoring and control program to be developed by the Army. Control of mammalian predators should also be included in this program. Monitoring should occur at least twice a year, to ensure that a species does not get established and widespread between monitoring periods. While we concur with the intent to monitor alien plants and invertebrates, the cost (\$20,000 per year to span construction of the road) to implement such a plan is underestimated and should be revised based on the following information.

It is costly to identify invertebrates due to the limited number of experts available in Hawaii to accomplish this task. Thus, it is likely that \$20,000 or more would be needed just to identify the invertebrate specimens collected during any one monitoring session. Additional funding for control of any alien species identified would still be required.

Potential alien species introductions into the area will not be limited to the time frame necessary for road construction. Road construction will provide the initial pathway for potential alien species introductions into the area; subsequently, a constant, increased threat of alien invasion from species being transported along the road can be anticipated as a result of increased traffic. Potential control of this problem will be exacerbated by the fact that there is very little information available on control of alien invertebrates in native communities.

There is no discussion of whether the proposed control of invasive species is aimed at specific species, plant or invertebrate, or at all alien species. We recommend that invertebrate monitoring be focused on ants and other ground-dwelling arthropods. Monitoring methods should include using pit-fall traps; spot control should be implemented whenever a new invasion is found.

We recommend that chemical control of fountain grass, which is the most detrimental alien species in PTA, be considered for inclusion in the plan. Chemical control of fountain grass should continue for at least five years or until the fountain grass reaches a very low level that can be controlled manually by the Army's environmental office using staff time only.

The alien species monitoring and control plan should be implemented in all of the kipuka found in Section III of the project area. Within Section III, alien plant control should not include herbicide use along the margins of wet forest, since repeated post herbicide application has favored invasive grasses, which have now been documented in these wet forests. Mowing would be a preferred alternative.

Finally, as discussed at our April 9, 1997, meeting, we are willing to assist the Army in preparing this plan along with close coordination and input from the Hawaii Division of Forestry and Wildlife, the USGS Biological Resources Division (BRD), and the Hawaii DOT. The plan should be included as an Appendix to the BA and the DEIS so that the specific measures to be implemented by the Army (for sections of the road through PTA) and by others (along the remaining sections of the road) to control invasions of alien invertebrates and plants and mammalian predators are fully disclosed to the public.

q. **Section 3.18.3 - Mitigation Measures. All Action Alternatives.**

Page 3-144. The DEIS states that, if any sensitive plant, faunal, avian, or invertebrate areas or species are found during construction, the Project Engineer will halt work and consult with appropriate resource and regulatory personnel. While we understand the value of this measure as a contingency plan in the event that all sensitive resources are not located prior to project initiation, we question whether it is reasonable to give this responsibility to the Project Engineer. We suggest that it may be more appropriate to hire a Project Biologist to ensure compliance with the environmental standards and mitigation measures identified.

r. **Section 3.18.3 - Mitigation Measures. Section II. [Cross-reference Draft Biological Assessment Page 24. Section II: Proposed Mitigation. Palila Mitigation Plan].**

Page 3-145. The palila mitigation plan developed by BRD, the State Division of Forestry and Wildlife, and the Service, which is referred to in the Draft BA and preliminary Draft EIS, should be included as an Appendix in both of these documents.

s. **Section 3.18.3 - Mitigation Measures. Section III. [Cross-reference Draft Biological Assessment Page 44. Section III. Proposed Mitigation.]**

Page 3-145. The BA briefly mentions fencing, but the DEIS only mentions staking to protect the population of *Pennisetum hawaiiensis* found within a few meters of the corridor in Section III. This information should be clarified in the Final BA and the Draft EIS. The Service recommends that

fencing measures identified for populations of *Silene hawaiiensis* also be implemented to protect the population of *Plantago hawaiiensis*.

**i. Section 3.18.3 - Mitigation Measures. Section III. (Cross-reference Draft Biological Assessment Page 45, Section III).**

Page 3-145 - 3-146. The BA states that plans will be modified to avoid "... all kipuka which still harbor native species along this segment" rather than all kipuka along the route. The BA and Draft EIS should clarify whether all kipuka or only some kipuka will be avoided. We recommend that all kipuka be avoided and that additional measures to minimize indirect impacts to kipuka (beyond the use of temporary orange plastic fencing during construction) be identified in the Final BA (discuss measures specific to the kipuka containing the endangered plant *Cyanza platyphylla* and other endangered species and SOCs) and the Draft EIS. Indirect effects include increased traffic along the road that may foster recreational or scenic interest in the kipuka. Measures to be considered to reduce these impacts include alien species monitoring and control and permanent fencing of the kipuka along the proposed road alignment. Fencing details (location, size, maintenance, etc.) for kipuka should be specified in the Final BA and Draft EIS.

**u. Preliminary DEIS. Chapter 4- Relationship Between Local Short-Term Uses of Man's Environment and Maintenance And Enhancement Of Long-term Productivity.**

Page 4.1. The statement in this section of the Preliminary Draft EIS that "The improvement of Saddle Road is not expected to foster new development along Saddle Road" conflicts with other statements in the document that increased development along the road is anticipated as a result of the road improvements. Information concerning any anticipated change in development or development rates along the road as a result of the proposed improvements is critical to the evaluation of project-related indirect and cumulative effects. This information should be supported with references and reported consistently in the DEIS.

Page 4-2. This section states that "No plant or wildlife species are expected to become extinct as a direct result of project activities." This statement is premature and should be deleted from the Draft EIS until the Service's biological opinion addressing impacts to endangered and threatened species is rendered.

**v. Preliminary DEIS. Page 6-1. Chapter 6 - Cumulative Impacts.**

Page 6.1. The cumulative impacts analysis in the Preliminary DEIS is too general. A more thorough evaluation of cumulative impacts in relation to future development along Saddle Road as a result of the road improvement project should be included. At a minimum, the "Related Projects" identified on page 3-21- 3-22 should be evaluated and cumulative impacts determined. For example, one of the related projects identified in the Preliminary DEIS in Section 3.1.4 and currently in the conceptual planning or development phase is a proposed cross-island water transmission line. The presence of a water line along the entire length of Saddle Road could affect native habitats and

wildlife resources beyond any discussed in the Preliminary DEIS. In particular, water leaks within Section II could induce changes in native dry grassland, shrubland, and forest communities (including papia critical habitat), making these habitats more susceptible to alien species invasions.

**SUMMARY COMMENTS**

In summary, the Service feels that the Preliminary DEIS and the Draft BA are deficient in providing detailed information on trust resources that are known to occur along the proposed corridors and on the mitigation planned for these resources, particularly for wetlands and threatened and endangered species. The Service will require detailed survey information and detailed mitigation plans in the DEIS and the Final BA in order to complete our evaluation of the project in accordance with our responsibilities under the Fish and Wildlife Coordination Act and the Endangered Species Act.

We appreciate the opportunity to provide comments on the Draft BA and the Preliminary DEIS. If you have questions regarding these comments, please contact me or Karen Rosa, Assistant Field Supervisor/Endangered Species Division, at 808-541-3441.

Sincerely,



Brooks Harper  
Field Supervisor  
Ecological Services

cc: William Moore, Okahara and Associates, Inc.  
Reginald David, Rana Productions, Inc.  
Colonel Mues, Commander PTA





# County of Hawaii

DEPARTMENT OF PUBLIC WORKS  
25 Aupunui Street, Room 202 • Hilo, Hawaii 96720-4232  
(808) 961-8321 • Fax: (808) 961-4610

Donna Fay K. Kiyosaki  
Chief Engineer  
Jiro A. Sumada  
Deputy Chief Engineer

Stephen K. Yamashiro  
Alyse

May 7, 1997

MR LARRY C SMITH PE DIVISION ENGINEER  
CENTRAL FEDERAL LANDS HIGHWAY DIVISION  
FEDERAL HIGHWAY ADMINISTRATION  
US DEPARTMENT OF TRANSPORTATION  
PO BOX 25246  
DENVER CO 80225-0246

SUBJECT: IPD-10E - Preliminary Draft Environmental Impact Statement (PEEIS)  
for Saddle Road Project, Island of Hawaii

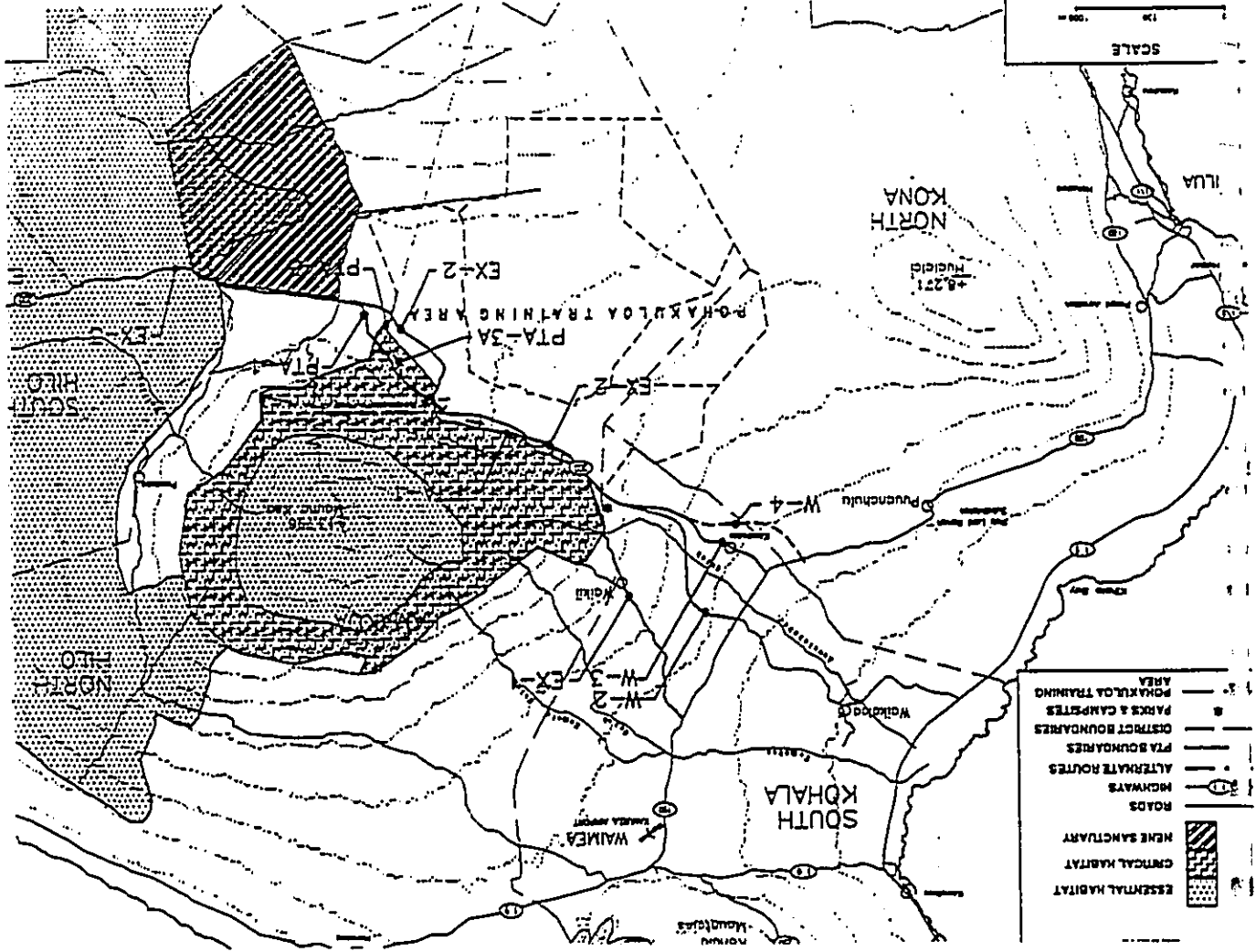
We have reviewed the referenced PEEIS and offer the following comments:

- Alignment W-6 appears to be most closely aligned with the western terminus of the Saddle Road realignment as identified in the Hawaii County General Plan. Therefore, we feel that the Draft EIS needs to address, in greater detail, the concerns regarding potential impacts on hunting and cultural resource area, open space, critical plant and animal habitats, and the increased fire danger which make this alternative infeasible. Additional discussion needs to occur in the EIS to document the decision to eliminate alternate W-6 from further study.
- We concur with Hawaii DOT that a design speed of 100 mph would be appropriate. Refer to their letter dated December 26, 1995.
- We concur with the concepts of an 8% maximum grade and separated bike lanes.

If you have any questions, please contact Thomas Pack of my Engineering Division staff at 327-3510.

*Donna Fay K. Kiyosaki*  
DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: ENG-HILO  
ENG-KONA (T. Pack)





US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225 0246

MAY 16 1997

In Reply Refer To:  
HFD-16E/1H A-AD-6(1)

Lt. Col. Ralph H. Graves, Commander  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

Attention: Kathleen A. Daley, PhD  
Environmental Engineer

Dear Col. Graves:

In recent conversations with Dr. Daley and Ms. Pat Billington, Assistant Division Counsel, we believe that we have tentatively reached agreement on a process for advancing the Saddle Road Project in accordance with the Memorandum of Understanding (MOU) for integration of the NEPA/404 process in the State of Hawaii as well as a method of delineation of Waters of the United States in order to confirm Individual or Nationwide 404 Permit status. This letter is to confirm these procedures with the U.S. Army Corps of Engineers, Pacific Ocean Division (USACE/POD) for advancement of this project through the Draft Environmental Impact Statement (DEIS) stage.

Regarding the MOU and permitting process, the Federal Highway Administration (FHWA) plans to submit a 404 Permit concurrent with the DEIS. The permit form, in some instances, would refer to the Environmental Impact Statement (EIS) for information and would be held as incomplete until transect field work could be completed and a delineation report submitted to you. The USACE would then use this information to make the determination as to whether the permit would be Individual or a grouping of Nationwide permits, or a combination of both along selected segments of the 50 mile project. This information would then be documented in the EIS, and subsequent permits, submitted during the design of those segments requiring permits, would reflect this decision.

As you know, the alternatives currently presented in the DEIS have been developed, with USACE/POD participation, by the Social, Economic, and Environmental Team (SEET Team) assembled for project guidance. As a result, the alternative alignments eventually selected for further analysis in the DEIS presently reflect minimized wetland impacts based on gross areal identification of biologically common terrain likely to contain wetland conditions.

In reference to the method of delineation of Waters of the United States, the determination of impacts thereto, and the development of mitigation measures within these biologically common terrain areas, it is our understanding that the establishment of two or three transects across the selected alternative alignments would be adequate to statistically define the percentage of these

2

areas actually containing wetlands. This percentage, when reduced further by the percentage of actual wetlands from a typical kipuka transect, would be applied to the proposed alternatives' rights-of-way as located through these biologically common terrain areas in order to estimate the potential impact to actual wetlands in each of the various alignments.

We understand that the transect method has been satisfactorily used by the USACE for jurisdictional delineation in the absence of a formally designated delineation program in Hawaii. It is also our understanding that delineation methods designated for use in typical mainland situations do not apply in Hawaii and that this method is preferable because disturbance to sensitive biological areas is minimized.

As you know, we began consultation with USACE/POD early in the DEIS process in order to meet our project development schedule for the publication of a document in the spring of this year. We want to maintain this schedule as closely as possible. However, it is the FHWA's intent to proceed with this project only in a manner that the USACE, as a regulatory agency, believes is adequate technically, within the intent of the NEPA/404 MOU, and meets the expectations of the other signatory parties to the MOU.

In our conversations to date, it is apparent that the USACE/POD consults with the U.S. Fish and Wildlife Service (USFWS) and the Environmental Protection Agency (EPA) at the staff level on matters of wetland impacts prior to rendering decisions on 404 Permit applications. In this light, would you please consult with the USFWS and the EPA through your usual channels in providing us with your confirmation that the aforementioned EIS process and delineation method is adequate for this project's advancement at this time. This would assist us in feeling relative assured that the primary 404/NEPA signatory parties are comfortable with these procedures.

In providing this confirmation, it would also be helpful if you would clarify any misunderstandings of procedure, methodology, or terminology in our descriptions so that we might lucidly present this information in the DEIS. If you have any questions or require further information in considering your response, please call Mr. Bert McCauley, Environmental Project Manager, at (303) 969-5924.

Thank you for your assistance and unwavering cooperation in the development of this project.

Sincerely yours,

/ s /

Larry C. Smith, P.E.  
Division Engineer

WILLIAM J. CAYTANO  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
P.O. BOX 821  
HONOLULU, HAWAII 96809

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DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND MANAGEMENT

WATER AND LAND DEVELOPMENT  
DIVISION

June 9, 1997

Mr. Larry C. Smith, P.E.  
Division Engineer  
U.S. Department of Transportation  
Federal Highways Administration  
P.O. Box 25246  
Denver Colorado 80225-0246

Dear Mr. Smith:

This letter responds to your request (reference HPD-16E) for a determination by the Department of Land and Natural Resources on the issue of taking a small portion of the "Kipuka Ainahou Nene Sanctuary" as part of the Saddle Road Realignment project. Your letter of May 6, 1997 and accompanying map indicate that the Saddle Road project will essentially follow the existing roadway, but as a result of widening, take a small strip of additional right of way on the south side of the road within the Nene Sanctuary. The size of the strip will range from 5 m to 19 meters in width with a total area of approximately 9.85 hectares (24.34 acres). Further design and or alignment refinements may possibly reduce this area to a very minimal size.

The northern boundary of the 38,400 acre Kipuka Ainahou Nene Sanctuary follows the existing Saddle Road and is the area of the Sanctuary that will be affected by the project. Nene were first released in this general area in the early 1970s with a total of 320 birds released during 1973-1975. The area was designated a Nene Sanctuary in 1974 but birds have not been released in the Sanctuary for the past 20 years because of poor survival due to inadequate habitat and predation. The number of nene using this general area is thought to be about 16 birds with 3 or 4 birds occasionally observed in the Sanctuary. The nene use that does occur in the area is infrequent and concentrated in the vicinity of Puu 6677 and Puu Oo Ranch, which are not in the Sanctuary. The limited use that does occur in the Sanctuary is predominantly for foraging during the day time. No successful production has been recorded in the Sanctuary within at least the last seven years. Because of these conditions, the Kipuka Ainahou Nene Sanctuary plays only a minor role in the overall recovery objectives for the Nene.

The area of the Sanctuary that the project will affect is a dry subalpine shrubland or volcanic flows along the northern edge of the Sanctuary. This is also a part of the Sanctuary that is leased from the Department of Hawaiian Home Lands (DHHL Lease Agreement No. 312). The presence of the Saddle Road along the northern boundary of the Sanctuary has not presented management

problems in the past. Consequently, because of the small reduction in the overall size of the Sanctuary (0.006%) and the avoidance of those areas that are used by Nene, the proposed realignment of the Saddle Road is not expected to adversely affect the function or overall value of the Sanctuary.

If you have questions or require additional information about the Kipuka Ainahou Nene Sanctuary, please contact Mr. Paul Conry, Wildlife Program Manager (587-0166) or Mr. Jon Griffin, Hawaii Branch Manager (974-4221) with the Division of Forestry and Wildlife.

Aloha,

MICHAEL D. WILSON

cc: Dean Uchida, Administrator, Lands Division  
Michael Buck, Administrator, Division of Forestry and Wildlife  
Jon Griffin, Hawaii Branch Manager, Division of Forestry and Wildlife  
Paul Conry, Wildlife Program Manager, Division of Forestry and Wildlife



DEPARTMENT OF THE ARMY  
PACIFIC-OCEAN DIVISION, CORPS OF ENGINEERS  
FORT SHAFTER, HAWAII 96858-5410

MEMPHIS  
ATTENTION

June 23, 1997

Operations Branch

Mr. Larry C. Smith  
Division Engineer  
U.S. Department of Transportation  
Federal Highway Administration  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80255-0246

Dear Mr. Smith:

This is to provide concurrence regarding procedures outlined in your letter, dated May 16, 1997, for integrating National Environmental Policy Act (NEPA) and the Department of the Army (DA) permit processes for the Saddle Road project. We agree that concurrent submittal of the DA permit application and Draft Environmental Impact Statement (DEIS) is consistent with the Memorandum of Understanding (MOU) integrating the NEPA/404 process in the State of Hawaii. We also understand that your current schedule requires these documents to be submitted as quickly as possible.

Workload constraints have delayed the Corps' field jurisdictional determination. However, based on general knowledge of the project area, the alternative alignments evaluated in the DEIS are not expected to have vastly different impacts to waters of the U.S. It is our understanding that the field delineation/determination is scheduled for July 2-3, 1997. Your DA permit application will not be accepted as complete for processing until we have received the results of the field visit.

The Corps also concurs with the proposed method of estimating the acreage of waters of the U.S., including wetlands described in your letter (i.e., extrapolation of wetland acreages delineated along representative transects) for the eastern portion (Sections III and IV) of the road. This methodology has been used appropriately in Hawaii and American Samoa.

The Corps will determine the presence of waters of the U.S. in the western alignments (Sections I and II) through identification of an ordinary high water mark (defined at 33CFR 328.3(e)). Each gulch crossing along each proposed alignment will be examined.

File Number 960010042 is assigned to this project. Please refer to this number in any correspondence with us. Please feel free to contact Ms. Kathleen Dadey of my Planning and Operations staff at (808) 438-9258, extension 15, if you have any questions.

Sincerely,

Ray H. Jyo, P.E., F.A.S.  
Director of Engineering  
and Technical Services

Copies Furnished:

U.S. Fish and Wildlife Service, Honolulu, HI  
U.S. Environmental Protection Agency, San Francisco, CA  
Federal Highways Administration, Region 9, San Francisco, CA  
Office of U.S. Senator Daniel K. Inouye, Honolulu, HI  
State Department of Transportation, Honolulu, HI  
Okahara and Associates, Hilo, HI





STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
33 SOUTH KING STREET, 6TH FLOOR  
HONOLULU, HAWAII 96813

REF: HP-AMIK

JUL 18 1997

Mr. Larry C. Smith, Division Engineer  
U.S. Department of Transportation  
Federal Highway Administration  
555 Zang Street/P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Smith:

**SUBJECT:** Section 106 Compliance (NHPA) for Mitigation Actions, Hawaii  
Defense Access Road A-AD-6(1) and Saddle Road  
(SR 200) Project--South Kohala, Hamakua, North Hilo and  
South Hilo Districts, Hawaii Island

We were recently told that the Federal Highway Administration is discussing proposals with the U.S. Fish and Wildlife Service to mitigate the impact of the Saddle Road Project on *palila* habitat. Some proposals apparently include attempts to rehabilitate appropriate vegetation communities in the region and would entail some modification of the landscape (e.g., fencing, road work, ground clearance). We wish to remind you that such activities are subject to Section 106 review and compliance because they constitute a Federal undertaking. These actions are the result of a Federally funded highway and, if we understand correctly, Federal funds will be spent on these mitigation measures.

We suggest that you consult our office in the near future regarding the areas under consideration and the kinds of landscape modifications planned. If we can comment on the project early, the planning process is more likely to proceed smoothly. While the number of historic properties on the upper mountain slopes can be low, there are some areas that should be avoided or used with caution.

0297-042

MICHAEL D. WILSON, CHAIRMAN  
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If you have any questions, please call Pat McCoy (587-0006), our Hawaii Island archaeologist, or Holly McEldowney (587-0008) of our History and Culture Branch.

Aloha,

Michael D. Wilson, Chairman  
State Historic Preservation Officer

HM:amk



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

552 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

**JUL 31 1997**

In Reply Refer To:  
HFD-1612/Saddle Road

Mr. Michael D. Wilson  
State Historic Preservation Officer  
Department of Land and Natural Resources  
33 South King Street, 6th Floor  
Honolulu, HI 96813

Dear Mr. Wilson:

We are in receipt of your July 18 letter concerning the applicability of Section 106 of the National Historic Preservation Act to certain possible Palila mitigation efforts on proposed replacement lands resulting from the proposed Saddle Road Project. We apologize for not keeping you informed of these discussions. Our lack of communication with you has apparently led to some confusion and inaccurate conclusions.

In order to clear this matter up, I would like to give you a brief history of these discussions. In April of this year, upon submitting a draft Biological Assessment (BA) to the U.S. Fish and Wildlife Service (USFWS) discussing possible Palila mitigation strategies in relation to the proposed Saddle Road Project, we were informed by USFWS that all details of the management of replacement lands would have to be worked through and tentatively agreed upon by all participating agencies prior to submission of the final BA. Discussions to date have been centered around possibilities only, with no agreements being reached. As soon as we have at least preliminary agreement on the *general nature* of the management strategies among the various agencies, we will include a discussion of these management strategies in the BA and the Draft Environmental Impact Statement, as possibilities only.

Early in our discussions with the USFWS about mitigation measures (June, 1996), Ms. Karen Rosa and Mr. Brooks Harper of the USFWS indicated that any activities designed to enhance the replacement lands or offset management strategies thereon would be considered part of a Federal action under implementation of their Palila Recovery Plan. This position was also reiterated at the April 1997 interagency meeting. Once the USFWS Palila Recovery Plan is advanced for consideration through appropriate environmental documentation, we would agree with you that proposals to implement *specific* management strategies on these replacement lands would then become a Federal undertaking, as defined by Section 106.

We believe that this reflects what will actually happen with the replacement lands which are proposed to be put in place only with project funds, i.e., monies for implementation of management strategies, physical improvements, or maintenance activities on these lands will be furnished through other sources and not Saddle Road project funds. Further, prior to the

approval of a Record of Decision for the Saddle Road Project, we intend to have a Memorandum of Agreement in place committing all agencies to implementation strategies and participation roles in the management of these lands under the Palila Recovery Plan of the USFWS. How these strategies and roles evolve into specific land management proposals will be manifested during development of the Palila Recovery Plan by the USFWS, most likely with input from participating agencies. Of course, the Federal Highway Administration will have no role in ensuring that actual implementation of management strategies proposed in the USFWS Palila Recovery Plan will occur.

I hope this responds adequately to your concerns regarding Section 106 applicability to proposed Palila recovery efforts resulting from the Saddle Road Project. If you have questions or need further information, please contact Mr. Dart McCauley, Environmental Project Manager at (303)-969-5924.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

cc: Mr. Abraham Y. Wong, Division Administrator, HIWA, PO Box 50206,  
Honolulu, HI 96850  
Maj. Gen. Alexis T. Lum, Executive Assistant, Office of Senator Daniel K. Inouye,  
7325 Federal Building, Honolulu, HI 96850  
Mr. Robert P. Smith, Manager, US Fish & Wildlife Service, PO Box 50088,  
Honolulu, HI 96850

bc: L. Henry  
R. Cushing  
D. Godson  
B. McCauley

yc: reading file

Central file - HI Defense Access Road A-AD 6(1)  
DMcCauley:jm:7/29/97:L:\env\adroad\palila.106



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
STATE HISTORIC PRESERVATION DIVISION  
33 SOUTH KING STREET, 8TH FLOOR  
HONOLULU, HAWAII 96813  
JUL 31 1997

MICHELLE WILSON, CHIEF, DIVISION  
OF LAND AND NATURAL RESOURCES  
DIVISION

Gilbert Coloma-Agaran 3242

AGRICULTURE DEVELOPMENT  
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LAND MANAGEMENT  
STATE PARKS  
WATER AND LAND DEVELOPMENT

REF:HP-AMK

Mr. Larry C. Smith, Division Engineer  
U.S. Department of Transportation  
Federal Highway Administration  
555 Zang Street/P.O. Box 25246  
Denver, Colorado 80225-0246

LOG NO: 19597  
DOC NO: 9706PMOS

Dear Mr. Smith:

**SUBJECT:** (HPD 16E). Review of Draft Report: "Archaeological Inventory  
Survey and Historic and Traditional Cultural Assessment  
for the Hawaii'i Defense Access Road A-AD-6(I)  
and Saddle Road (SR 200) Project"  
(Lauglas, Wolforth, Head and Jensen 1997) South Kohala, Hamakua,  
North Hilo and South Hilo Districts, Hawaii Island

Thank you for your letter of April 10, 1997 and the opportunity to review and comment on the subject report. Your cover letter requests that, pursuant to Section 106 of the National Historic Preservation Act, we review the inventory survey report and concur with the eligibility determinations proposed for the historic properties identified in the report. You also ask us to comment on the criteria of effect applied to each property given the mitigation treatments proposed. Two of our staff have reviewed the report, one reviewing the archaeological component and, the other, the ethnographic and historical sections of the inventory survey. Our comments on the identification of historic properties, their significance and the potential effect of the project on these properties are outlined in the following letter. Please refer to Attachment I for general and specific comments on particular sections of the inventory survey report. These detailed comments are numbered to facilitate your consultant's response.

1. **Identification of Historic Properties.** We believe that the inventory survey of the project area was adequate, finding a total of 16 properties within the defined Area of Potential Effect (APE). The archaeological survey methods used were adequate to identify and locate all historic properties within the defined APE. The ethnographic study constituted a reasonable and good faith effort to identify and contact individuals who could have knowledge of historic

properties and traditional cultural properties in or near the APE. The methods and approaches used to interview these individuals were sufficient to document and evaluate the information provided. The compilation and presentation of historical background information was adequate to predict which kinds of historic properties might be found in the project area and to provide the historical context within which to evaluate identified properties. In Attachment I we ask for some clarification and revision of the archaeological background summary.

We disagree, however, with the number of historic properties under consideration. Two previously identified properties (Site Nos. 5003 and 14638), located just outside of the APE, should be included in the project area because of their proximity to the road and, thus, the chance of their being damaged during construction or use of the new road. Also, if mitigation measures are being proposed for an identified burial site (page 1316), we feel it should be described as an historic property and given a site number. This can be done without disclosing the site's location. Thus we feel that 19, instead of 16, properties should be under consideration.

2. **Eligibility Determinations and Significance Evaluations.** We do not agree with all the eligibility determinations proposed in the report. First, we do not understand why eight of the 16 identified properties are evaluated as not significant and thus not eligible for listing on the NRRHP. It seems to us that all of these properties are, at least, significant under Criterion D in that they have already yielded information about the history of the area. The rationale for concluding that these eight sites are not significant should be clearly argued before we can consider this determination. Second, we think that six of the eight properties determined eligible are significant under more criteria than those argued in the report. We believe that the Saddle Road (Site 20864) is significant under Criterion A as well as D because of its direct association with W.W.II, a event which is clearly significant in the broad patterns of history. Construction of the Old Waimea-Kona Belt Road (20855) is also associated with major changes in the economic and social history of the region and should be considered significant under Criterion A. Sections of the "Kaohle Wall" (5002) appear to be excellent examples of a type, period or method of construction and should therefore be significant under Criterion C. Similarly, elements of the Pu'u Oo Trail (10309), the Old Waimea-Humu'ula Wagon Road (21150) and the Humu'ula Sheep Station and Perimeter Wall (7119) would also be eligible under Criterion C. In fact, portions of the wagon road may be the only remaining example of its type.

3. **Determination of Effect.** You asked that we comment on the criteria of effect applied to each eligible property in the report. We can not comment officially on these determinations until differences are resolved over significance evaluations and the number of sites being evaluated, but we can provide a preliminary assessments. We disagree with the approach taken in applying the criteria of effect to the eight properties the authors find eligible. They argue that the project will have "no adverse effect" on seven of the eight eligible properties and on a part of the eighth property because they can be considered as exceptions from the criteria of adverse effect as defined in the regulations (36 CFR 8000.9 (c)). The authors believe that, under these regulations, the otherwise "adverse effect" of the project on the identified properties, or portions of these properties, can be considered "not adverse" because

appropriate data collection and documentation has taken place or will take place. We see two problems with this interpretation of the regulations. First, according to the regulations, the exception cited applies when a property is only of value for its potential contribution to research and when such value can be preserved through appropriate research. We believe this means that the exception applies when a property is significant only for its information content (i.e., Criterion D). Thus this exception should not be considered for properties that are significant under multiple criteria. As we feel that all eight properties, instead of six, are from the criteria of adverse effect. Second, we see nothing in the regulations suggesting that the criteria of effect can be applied to a single segment of a property instead of the entire property. For example, the criteria of effect needs to be applied to an entire trail, road or wall. In these cases, we will probably agree that the adverse effects can be mitigated because they only impact a relatively small segment of the historic property, but this does not preclude applying the criteria of effect to the entire property. Based on available information it appears that the effect determination for the undertaking will be one of "adverse effect."

The eight properties assessed by the authors as not being eligible for the NRHP (Site Nos. 20854, 20862, 20865, 20877, 20856, 20869, 20872, and 20873) may, we believe, qualify as exceptions from the criteria of adverse effect (i.e., "no adverse effect" applies). We agree that they are probably only significant under criterion D. They have been sufficiently well documented and further study would not contribute any new information.

4. **Consultation with Native Hawaiian Organizations.** The report adequately documents a good faith effort to contact the two native Hawaiian organizations mentioned in NHPA and other native Hawaiian organizations that are appropriate because of their association with the region within which the project is located. Please note that individuals contacted in the initial round of notification and consultation should be given the opportunity to comment on the results of the inventory survey, proposed mitigation measures and stipulation in the Memorandum of Agreement. If they wish to participate, individuals interviewed by Pun Kanahole should also be consulted.


5. **Hawaiian Cultural Impact Assessment.** At a recent meeting, representatives of Federal Highways and the Hawaii Department of Transportation asked us to review a cultural impact assessment prepared for this project (Kanahole and Kanahole, *A Hawaiian Cultural Impact Assessment of the Proposed Saddle Road Alignments*) in case information contained in the report has a bearing on compliance with the Section 106 process. The assessment addresses several broadly defined concerns of the native Hawaiian community about the impact of the proposed highway. These discussions are drawn from a literature search, interviews with native Hawaiians, and a discussion of Hawaiian place names, terminology, chants and *mele*.

We will address the material presented in the report under separate cover, after staff has had an opportunity to discuss this report with the Kanaholes.

To proceed with the archaeological review process, agreement needs to be reached on the number of sites in the project area and the eligibility determinations for each identified property. We also need to resolve differences over the application of the criteria of effect for the identified properties. Based on present information, we believe that a Memorandum of Agreement will be needed to stipulate which actions will be taken to mitigate the adverse effects of the undertaking on significant historic properties. Overall, we think some parts of the report are well done and it is a pleasure to have detailed historical information integrated with the individual property descriptions. Some of the historical background summaries will be very useful for others working in the region in the future.

If you have any questions, please call Pat McCoy (587-0006), the Hawaii Island archaeologist, or Holly McElhinney (587-0008) of the History and Culture Branch.

Aloha,

  
MICHAEL D. WILSON, Chairperson and  
State Historic Preservation Officer

PM:amk

c. Glen Yasui, FHWA  
Paul Rosendahl



**Okahara & Associates, Inc.**  
ENGINEERING CONSULTANTS

August 11, 1997  
Letter No. 46579  
Reference No. 97024

Department of Land and Natural Resources  
Land Division  
75 Aupuni Street, Ste. 204  
Hilo, Hawaii 96720

Attention: Harry Yada, Land Agent  
Project: ENVIRONMENTAL STUDIES ON HI A-AD-6, SADDLE ROAD  
Contract No. DTFH68-97-D-00011  
Task Order No. DTFH68-97-T-00002

Subject: Right-of-Entry to Various Government Lands  
Federal Highways Administration and Okahara & Associates, Inc.  
Saddle Road Project

Dear Mr. Yada,

This is to follow up with respect to your phone conversation of August 7, 1997 with William Moore regarding the Department of Land and Natural Resources' right-of-entry for the Saddle Road project. This right-of-entry allowed necessary field work for the preparation of an Environmental Impact Statement (EIS) in compliance with both State and Federal law as well as preparation of a Conservation District Use Permit Application (CDUA) for the proposed Saddle Road improvements.

The right-of-entry was granted on March 24, 1995 to the Federal Highway Administration (FHWA) and RUST Environmental and Infrastructure (RUST) with an expiration date of June 30, 1996.

While the initial field work and scientific studies for the Saddle Road EIS were completed prior to June 30, 1996, we had found that additional field work is required to finalize the draft EIS and as well as to address issues that may be raised prior to the completion of the final EIS.

Accordingly, on behalf of the FHWA, Okahara & Associates, Inc. (O/A) is seeking an extension to the right-of-way to various Government Lands as identified in the DLNR staff report dated March 24, 1995.

Page 2  
Letter No. 46579  
Reference No. 97024

The Scope of Work to be conducted on the right of entry would be as follows:

1. To perform horizontal and vertical surveys and to conduct a topographic survey which determines the positions of natural and artificial features within and adjacent to the proposed project. The information obtained from these surveys is needed for the design phase of the project development process.
2. To replace centerline and right-of-way stakes for the proposed project as required.
3. To conduct and update environmental surveys which include, but are not limited to, cultural resource survey, survey and removal of unexploded ordnance, and biological, wildlife, botanical, invertebrate, wetlands and other survey work necessary for the completion of the EIS.

The existing terms and conditions of the right-of-entry, with the exception of the effective date of June 30, 1996, are acceptable. We are requesting that the expiration date be amended to December 31, 1998 or completion of the EIS process, whichever ever occurs sooner. This will ensure that should any further environmental work be required during the EIS process, such work can be conducted under this right-of-entry.

Furthermore, reference to RUST should be replaced by Okahara & Associates, Inc. FHWA has retained O/A as the prime consultant of this project. Accordingly, O/A will be responsible for compliance with any conditions placed on the right-of-entry extension.

Your assistance and cooperation on this matter is greatly appreciated. Please call me at 961-5527 or Nancy Burns, P.E., project engineer at 329-1221 if you have any questions on this matter.

Sincerely,  
OKAHARA & ASSOCIATES, INC.

*William K. Okahara*

Donald K. Okahara, P.E.  
President

WLM-DKO:im

cc: Glenn Yasui, FHWA-Hawaii District  
Bert McCauley, FHWA-Denver

Donald K. Okahara, P.E. • Macdonald H. Adams, P.E. • Lawrence Hoppo, P.E. • Glenn S. Burtel, P.E. • Nancy E. Burtel, P.E.  
700 KUI KUIA ST. • HONOLULU, HI 96813 • PHONE (808) 527-5527 • FAX (808) 941-5529  
4701 KAHALA HWY., STE. 212 • HONOLULU, HI 96817 • PHONE (808) 524-1224 • FAX (808) 521-3151  
73-5514 MAUNU STREET, BAYVIEW • HONOLULU, HI 96817 • PHONE (808) 527-5527 • FAX (808) 521-3151  
A. • H. • K. • M. • P. • S. • T. • U. • V. • W. • X. • Y. • Z.



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

AUG 18 1997  
In Reply Refer To:  
HFD-16E/HI A-AD-6(1)

Ref: File # 960010042

Ray H. Jyo, P.E.  
Director of Engineering  
U. S. Army Corps of Engineers  
Building 230  
Ft. Shafter, HI 96858-5440

Attention: Kathleen A. Dadey, Ph.D.  
Environmental Engineer

Dear Mr. Jyo:

Thank you for your letter of June 23 responding to our request for concurrence with procedures for processing 404 permits and methods for jurisdictional determination of waters of the U.S. for the Saddle Road project. You indicated that concurrent submission of the U.S. Department of the Army permit application and Draft Environmental Impact Statement (DEIS) would be considered consistent with the Memorandum of Understanding (MOU) integrating the NEPA/404 process in the State of Hawaii.

As you know, there are two alternative alignments under consideration within Sections III and IV of the proposed project. One is a combination of alignment segments EX-3 and EX-4A, and the other is a combination of EX-3 and E-3. At this point in the NEPA process, we do not have a preferred alternative in this section of the proposed project. We will be relying on the DEIS comments received from the USACE and others to assist in determining which segments should be proposed for selection in the Final EIS and, subsequently, the Record of Decision.

We are presently proposing to include in the DEIS a DA Permit Form 4345 for each alternative alignment and all information required for each permit. This will allow you to comment on the format and completeness of the permit forms as well as the adequacy of the information given so that, when an alternative alignment is selected, we can submit the required permit for your formal consideration. In order to do this and meet our schedule for publication of the DEIS, we need your jurisdictional determination on permit type (individual or nationwide) for those wetlands within the above alternative alignment sections before September 1. It is our understanding it has been determined that there are no waters of the U.S. within the PTA or the western alternatives under consideration.

As you know, a jurisdictional determination field trip was held July 2 and 3. As a result of that trip and further investigations by Mr. Grant Gerrish, our wetlands consultant, we have determined that the total impact to wetlands along alignment segments EX-3 and EX-4A is estimated to be approximately 21.0 acres and along segments EX-3 and E-3, approximately 28.1 acres. It is our understanding that the methodology and rationale for these determinations have been conveyed to Dr. Dadey under separate cover from Mr. Gerrish.

If you require additional information or have questions concerning proposed permit procedures or our request, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 969-5924. Thank you for your assistance and cooperation in the development of this project.

Sincerely yours,

**LARRY D. HENRY**

Larry C. Smith, P.E.  
Division Engineer

cc: Mr. Kazu Hayashida  
Director, Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097

Mr. David Farrell  
Chief, Office of Federal Activities (E-3)  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Mr. Robert P. Smith  
Manager, Pacific EcoRegion  
U.S. DOI, Fish & Wildlife Service  
P.O. Box 50088  
Honolulu, HI 96850

Maj. Gen. Alexis T. Lum (Ret.)  
Executive Assistant  
Office of U.S. Senator Daniel K. Inouye  
7325 Federal Building  
Honolulu, HI 96850



555 Zang Street  
P.O. Box 75746  
Denver, Colorado 80275-0246

Central Federal Lands  
Highway Division

Ms. Nancy Burns  
Senior Engineer  
Okaham & Associates  
73-5574 Main Street, Bay 613  
Kailua-Kona, HI 96740

Ms. Julie A. Cimillo  
Regional Administrator  
Federal Highway Administration  
201 Mission Street, Suite 2100  
San Francisco, CA 94105

Mr. Abraham Y. Wong  
Division Administrator (HDA-III)  
Federal Highway Administration  
Box 50206  
Honolulu, Hawaii 96850

bcc:

L. Henry  
R. Cushing  
D. Geddon  
B. McCauley

Central File III A-AD-6(1)  
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BMc

SEP 04 1997  
In Reply Refer To:  
HFD-16E

Mr. Dave Carlson  
Environmental Protection Agency  
75 Hawthorne Street, Code CMD-2  
San Francisco, CA 94105

Dear Mr. Carlson:

As you have recently become aware of the proposed Saddle Road Project on the island of Hawaii, I would like to transmit additional background information to you for your use in familiarizing you with the project. As you know, this is a Federal Action and the Federal Highway Administration (FHWA), Federal Lands Highway Division is the action agency for this proposal. Since this project has quite a lengthy history, I am enclosing a project history outline that will be presented in the Draft EIS (DEIS).

It is my understanding that Ms. Leslie McNaughey of EcoPlan, our consultant assembling the document, has transmitted separately to you a copy of Chapters 1, 2, and 3 from the DEIS. Please be aware that this document is in the process of being revised and may not appear exactly as the copies you now have.

In addition to these materials, I am enclosing a copy of the Social, Economic, and Environmental (SEE) Team membership list. The SEE Team is assembled in the initial scoping phases of a project according to our Action Plan to guide the development of project purpose and need, select criteria for evaluation of alternatives, and decide the actual selection of alternatives to be carried forward for further analysis.

I am also enclosing a copy of all correspondence, including our invitation for Cooperating Agency status, transmitted to Mr. David Farrel in Region 9 of the EPA. I would also encourage you to discuss this project with Dr. Kathleen Dadey of the U.S. Army Corps of Engineers, Pacific Ocean Division (USACE/POD) as it is my understanding that she has discussed this proposed project with wetland scientists in Region 9 of the EPA.

We would request that you transmit any comments to this office concerning the materials that the FHWA has furnished by October 8, so that we may incorporate them into the DEIS scheduled for publication in late October 1997. We will transmit a copy of the Wetlands Determination Study completed by Dr. Grant Gerrish of the University of Hawaii in cooperation with the USACE, Pacific Ocean Division, when we have a chance to review the draft and make required revisions.

If you have any questions or need further information, please contact Mr. Bert McCauley,  
Environmental Project Manager at (303) 969-3924.

2

Sincerely yours,

*Robert Menell*

for Larry D. Henry, P.E.  
Project Development Engineer

Enclosures

cc (w/o enclosures):

Mr. Abraham Y. Wong, Division Administrator, FHWA, HAD-III, Box 50206,  
Honolulu, HI 96850  
Maj. Gen. Alexis T. Lum (Ret.), Executive Assistant, Office of U.S. Senator  
Daniel Inouye, 300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850  
Mr. David Farrel, Chief, Office of Federal Activities, U.S. EPA, 75 Hawthorne Street,  
San Francisco, CA 94105-3901  
Dr. Kathleen Dadey, Environmental Engineer, USACE/ROD, Building 230, Ft. Shafter,  
HI 96858-5440  
Mr. Merrill Deskins, Environmental Specialist, FHWA, Region 9, 201 Mission Street,  
Suite 2100, San Francisco, CA 94105  
Ms. Nancy Burns, Senior Project Engineer, Okalara & Associates, Inc., 73-5574 Maiau  
Street, Bay 6B, Kailua-Kona, HI 96740  
Ms. Leslie McGaughey, Project Manager, EcoPlan Associates, Inc., 1845 S. Dobson  
Road, Suite 111, Mesa, AZ 85202



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zeng Street  
P.O. Box 22746  
Denver, Colorado 80275-0246

Mr. Ray H. Jyo, P.E.  
Director of Engineering  
U. S. Army Corps of Engineers  
Building 230  
Ft. Shafter, HI 96858-5440

Attention: Kathleen A. Dadey, PhD  
Environmental Engineer

Dear Mr. Jyo:

Thank you for your letter of June 23 responding to our request for concurrence with procedures for processing 404 permits and methods for jurisdictional determination of waters of the U.S. for the Saddle Road Project. You indicated that concurrent submittal of the Department of the Army permit application and Draft Environmental Impact Statement (DEIS) would be considered consistent with the Memorandum of Understanding (MOU) integrating the NEPA/404 process in the State of Hawaii.

As you know, there are two alternative alignments under consideration within Sections III and IV of the proposed project. One is a combination of alignment segments EX-3 and EX-4A and the other is a combination of EX-3 and E-3. At this point in the NEPA process, we do not have a preferred alternative in this section of the proposed project. We will be relying on DEIS comments received from the USACB and others to assist in determining which segments should be proposed for selection in the Final EIS and subsequently the Record of Decision.

Presently, we are proposing to include in the DEIS, a DA Permit Form 4345 for each alternative alignment and all information required for each permit. This will allow you to comment on the format and completeness of the permit forms as well as the adequacy of the information given so that when an alternative alignment is selected, we can submit the required permit for your formal consideration. In order to do this and meet our schedule for publication of the DEIS, we need your jurisdictional determination on permit type (Individual or Nationwide) for those wetlands within the above alternative alignment sections before September 1. It is our understanding it has been determined that there are no waters of the U. S. within the PTA or the western alternatives under consideration.

As you know, a jurisdictional determination field trip was held July 2 and 3. As a result of this trip and further investigations by Mr. Grant Gerrish, our wetlands consultant, we have determined that the total impact to wetlands along alignment segments EX-3 and EX-4A is estimated to be approximately 21.0 acres and along segments EX-3 and E-3, approximately 28.1 acres. It is our understanding that the methodology and rationale for these determinations has been conveyed to Dr. Dadey under separate cover from Mr. Gerrish.

In Reply Refer To:  
IPD-16E / HI A-AD-6(1)

Ref: File # 960010042





If you require additional information or have questions concerning proposed permit procedures or our request, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 969-5924. Thank you for your assistance and cooperation in the development of this project.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

cc: Mr. Robert P. Smith, Manager, U.S. F & WS, Pacific EcoRegion  
Mr. Kazu Hisayashida, Director, Hawaii DOT  
Mr. David Farrel, Chief, Office of Federal Activities, U.S. EPA  
Ms. Julie Anna Cutillo, Regional Administrator, FHWA, Region 9  
Mr. Abraham Y. Wong, Division Administrator, FHWA, HI Division  
Maj. Gen. Alexis T. Lum, Executive Assistant, Senator Daniel K. Inouye  
Ms. Nancy Burns, Senior Engineer, Okahara & Associates

bcc:  
L. Henry  
R. Cushing  
D. Gedeon  
B. McCauley  
L:\envitonm\slroad\corp\wcl2.ltr

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80275-0246

SEP 17 1997

In Reply Refer To:  
HHPD-16E

Lt. Col. Ralph H. Graves, Commander  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

Attention: CIEFOD-ET-FO (K. Dauley)

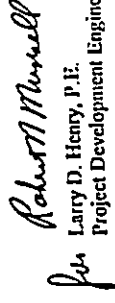
Dear Colonel Graves:

As agreed upon in previous correspondence with your office, we are herewith submitting an Application for Department of the Army Permit, Engineering Form 4345 (404 Permit) for Federal Highway Administration (FHWA) project A-AD-6(1), Saddle Road, Manuakia Highway to Milepost 6, Hawaii County, Hawaii. A detailed report of wetlands determinations as well as the Draft Environmental Impact Statement will be forthcoming in October.

The FHWA's Memorandum of Understanding (MOU) with the Corps of Engineers for integrating the NEPA and 404 process requires that we submit a 404 Permit for concurrent review with the Environmental Impact Statement. In some instances, as in this case, the procedures outlined in the MOU do not quite fit the development of a project. We anticipate that addendums or supplemental information to this application will need to be submitted when an alignment has been selected and design proceeds.

If you have any questions or need additional information, you may contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924 or Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates at (808) 329-1221. Thank you for your assistance in the development of this project.

Sincerely yours,

  
Larry D. Henry, P.E.  
Project Development Engineer

Enclosure

cc (w/enclosure):

Mr. Abraham Wong, Division Administrator, FHWA, HI Division  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kona, HI  
Dr. Grant Gurrish, Okahara & Associates, Hilo, HI  
Mr. Merrill Deskins, Environmental Specialist, FHWA, Region 09, San Francisco, CA  
Ms. Leslie McGaughey, Project Manager, Ecollan & Associates, Mesa, AZ  
Mr. David Farrel, Chief, Office of Federal Activities, Environmental Protection Agency, San Francisco, CA Alt: Mr. Dave Carlson

**APPLICATION FOR DEPARTMENT OF THE ARMY PERMIT**  
(33 CFR 325)

OMB APPROVAL NO. 0710-003  
Expires October 1998

Public reporting burden for this collection of information is estimated to average 5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and reviewing and reporting the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Service, Department of Commerce, 4800 Marking Drive, Washington, DC 20503-9000. Send all requests for information to the Office of Management and Budget, Paperwork Reduction Project (0710-0003), Washington, DC 20503. Please DO NOT RETURN your form to either of these addresses. Completed applications must be submitted to the District Engineer having jurisdiction over the location of the proposed activity.

**PRIVACY ACT STATEMENT**

Authority: 33 USC 401, Section 10; 1413, Section 404. Principal Purpose: This law requires permits authorizing activities in, or affecting, navigable waters of the United States, the discharge of dredged or fill material into waters of the United States, and the transportation of dredged material for the purpose of dumping it into ocean waters. Routine Uses: Information provided on this form will be used in evaluating the application for a permit. Disclosure of requested information is voluntary. If information is not provided, however, the permit application cannot be processed nor can a permit be issued.

One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings) and instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned.

ITEMS 1 THRU 4 TO BE FILED BY THE CORPS	
1. APPLICATION NO.	4. DATE RECEIVED
2. FIELD OFFICE CODE	3. DATE RECEIVED
4. DATE APPLICATION COMPLETED	

ITEMS 5 THROUGH 10 TO BE FILED BY APPLICANT

5. APPLICANT'S NAME (FIRMA)  
U.S. Department of Transportation

6. APPLICANT'S ADDRESS  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80255-0246

7. APPLICANT'S PHONE NOS. W/AREA CODE  
a. Residence  
b. Business (303) 969-5924

8. AUTHORIZED AGENT'S NAME AND TITLE (see applicant and contact info)  
Okahara & Associates, Inc.

9. AGENT'S ADDRESS  
73-5574 Maiiau St., Bay 6B  
Kailua-Kona, HI 96740

10. AGENT'S PHONE NOS. W/AREA CODE  
a. Residence  
b. Business (808) 329-1221

11. STATEMENT OF AUTHORIZATION  
I, Okahara & Associates, to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.

*X* Okahara & Associates  
APPLICANT'S SIGNATURE  
9/16/97  
DATE

12. PROJECT NAME OR TITLE (see instructions)  
A-AD-6(11)  
State Route 200 - Saddle Road  
Mamalahoa Highway to Milepost 6

13. NAME OF WATERBODY, IF KNOWN (see instructions)  
N/A

14. PROJECT STREET ADDRESS (if applicable)  
N/A

15. LOCATION OF PROJECT  
Hawaii  
COUNTY  
Hawaii  
STATE

16. OTHER LOCATION DESCRIPTIONS, IF KNOWN, AND DISTANCES BETWEEN VARIOUS LOCATIONS OCCUR AT  
Long. 155°-43'-28" to Long. 155°-09'-00"  
Lat. 19°-52'-40" to Lat. 19°-41'-10"

17. DIRECTIONS TO THE SITE  
Saddle Road, State Highway 200 (H200), is a two-lane road approximately 85 kilometers (km) in length extending westerly from Hilo to the junction with State Highway 90 (H90). The Mamalahoa Highway, approximately 10 km south of Waimea, on the island of Hawaii. Waters of the U.S. (wetlands) occur at various locations between Hilo and Milepost 14. (See attached map)

18. Nature of Activity (Description of project, include all features)  
See attached.

19. Project Purpose (Describe the reason or purpose of the project, and how achieved)  
See attached.

20. Reason(s) for Discharge  
USE BLOCKS 20-22 IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED  
See attached.

21. Type(s) of Material Being Discharged and the Amount of Each Type in Cubic Yards  
See attached.

22. Surface Area in Acres of Wetlands or Other Waters (if more than one)  
See attached.

23. Is Any Portion of the Work Already Complete? Yes  No  IF YES, DESCRIBE THE COMPLETED WORK

24. Address of Adjoining Property Owners, Lessors, Etc., Whose Property Adjoins the Waterbody (if more than one can be entered here, please attach a supplemental list).  
see attached.

25. List of Other Certifications or Approvals/Permits Received from other Federal, State or Local Agencies for Work Described in This Application.  
AGENCY TYPE APPROVAL IDENTIFICATION NUMBER DATE APPLIED DATE APPROVED DATE DERIVED  
See attached

\* Would include but is not restricted to zoning, building and flood plain permits

26. Application is hereby made for a permit or permits to authorize the work described in this application. I certify that the information in this application is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the applicant.  
X Okahara & Associates  
SIGNATURE OF APPLICANT  
9/16/97  
DATE  
SIGNATURE OF AGENT  
DATE

The application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in block 11 has been filed out and signed.

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up any such scheme, or deprives a material fact or makes any false, fictitious, or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than \$10,000 or imprisoned not more than five years or both.

18. The proposed improvements would upgrade Saddle Road to acceptable American Association of State Highway and Transportation Officials (AASHTO) Standards. Uphill passing lanes, truck escape ramps, scenic pullouts, military crossings, bike lanes and drainage structures will be constructed.

Based on preliminary roadway plans, earthwork for the proposed roadway construction may involve excavation depths up to 15 meters and embankment heights up to 9 meters. The majority of cut depths range between 1 and 8 meters with the majority of fill depths range between 1 and 4 meters.

The areas where cuts and fills are within the wetlands occur at various locations between milepost 7 and 14. There are two alternative alignments that are proposed within these boundaries. One alignment consists of segments EX-3 and EX-4a. The other consists of segments EX-3 and E-3. (See Wetlands Determination Report & DEIS)

19. The proposed project would improve Saddle Road to a two-lane highway with enough capacity to safely handle both current and projected traffic volumes up to the year 2014. A combination of realigning the existing alignment and construction of new proposed alignments would be used to improve Saddle Road.

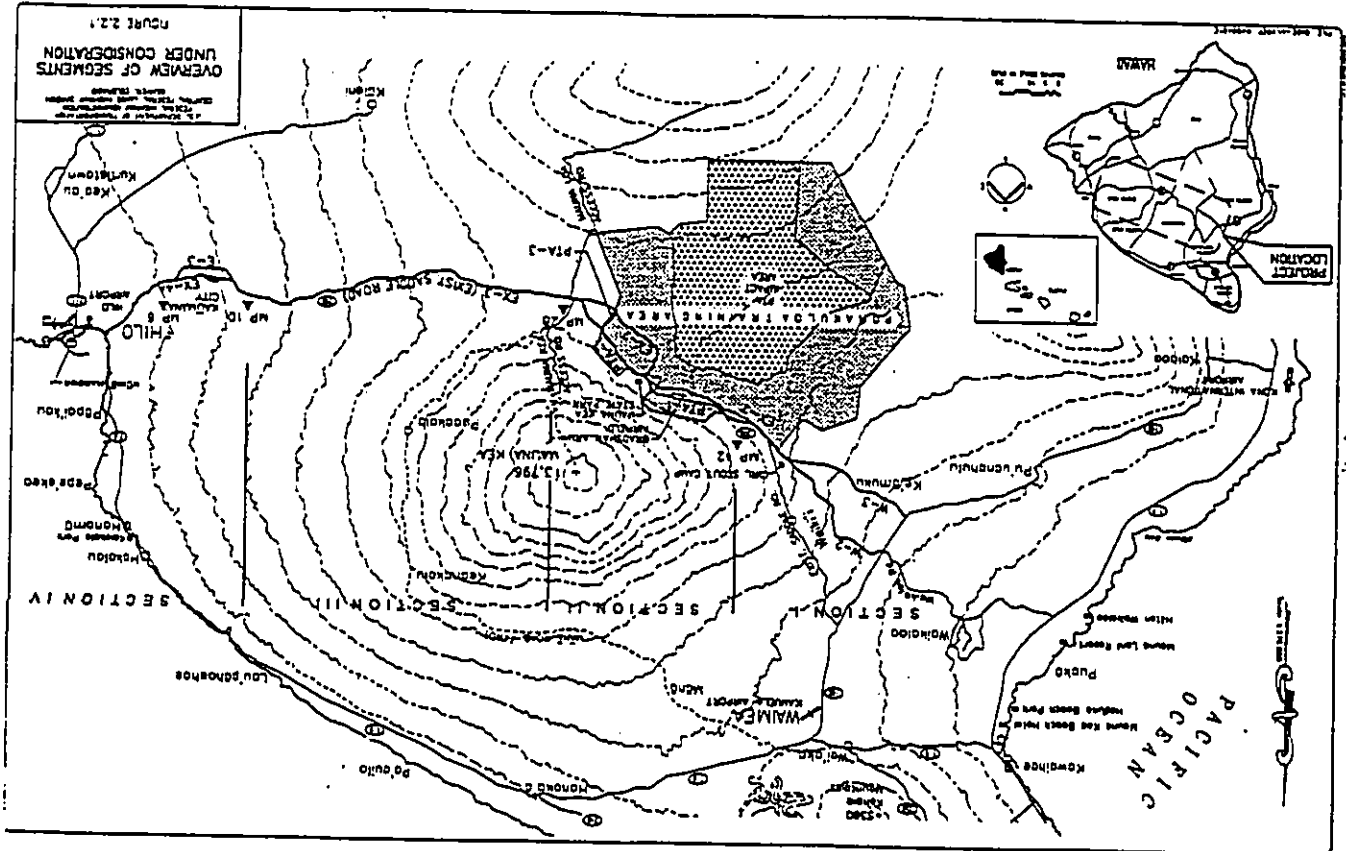
20. Construction activities within the wetland areas include cut and fill embankments for the roadway structure, installation of culverts within the ephemeral drainages, and implementing the best management practices for erosion control.

21. The types of material to be used would range from volcanic ash soils and cinder sands and gravels to weak cobblely basalt rock and hard basalt rock formation. The amount of cut and fill quantities varies for each alternative. The estimated earthwork quantities for segments EX-3 and EX-4a are 100,153 cy M of cut and 80,604 cy M of fill. The estimated earthwork quantities for segments EX-3 and E-3 are 239,112 cy M of cut and 214,024 cy M of fill.

22. The total wetland areas impacted by the Saddle Road project are as follows:  
 Segment EX-3 = 5.91 ac  
 EX-4a = 0.99 ac  
 E-3 = 8.00 ac

TMK	Owner	Owner Address	City	St. / Zipcode	Lessee
2-5-01:01	Hawaii Conference Foundation	P.O. Box 18	Pepeekeo	HI 96783	DWS
2-5-01:02	State of Hawaii	none	Pepeekeo	HI 96873	DOFAW Forest Reserve
2-5-01:03	Mauna Kea Sugar	P.O. Box 18	Pepeekeo	HI 96873	DOFAW Forest Reserve
2-5-01:06	State of Hawaii	none	Pepeekeo	HI 96873	DOFAW Forest Reserve
2-5-01:08	State of Hawaii	none	Pepeekeo	HI 96873	BA King Shim/HELCO

TMK	Owner	Owner Address	City	St. / Zipcode	Lessee
2-5-01:08	State of Hawaii	none	Honolulu	HI 96817	BA King Shim/HELCO
2-5-01:11	Hawaii Conference Foundation	115 Craigside Ave.	Honolulu	HI 96817	none
2-5-01:14	County of Hawaii Water Commission	25 Aupuni St.	Hilo	HI 96720	none
2-5-02:12	State of Hawaii	none	Hilo	HI 96720	Unencumbered
2-5-02:17	Young, Wallace	P.O. Box 1513	Hilo	HI 96720	none
	Hook Kwok 20%, Wong, Lily Trust 20%, Young, Henry S H 10%, Chun, Gladys Y 10%, Young, Alan S C 8.67%, Young, Michael S H 8.67%, Young, Robert S Y 6.67%, Young, Kenneth H K Esting 20%				
2-5-38:80	Costales, Michael	25-05 Ua Mahalo St.	Hilo	HI 96720	none
2-5-38:82	Betcher, Karen	25-3571 Opalipali St.	Hilo	HI 96720	none
2-5-38:83	DeCosta, Reynold J. & Marilyn M.	984 Alinalako Rd.	Hilo	HI 96720	none
2-5-38:84	De Lima, Herbert E.	2493 Kilauea Ave.	Hilo	HI 96720	none
2-5-38:85	Weir, Donald G. & Carol P.	P.O. Box 11217	Hilo	HI 96721	none
2-5-38:86	Miyasato, Carl Y. & Diane S.	1455 Akeakamal St.	Honolulu	HI 96816	none
2-5-38:87	Kunimura, Sharon T.	1465 Akeakamal St.	Honolulu	HI 96810	none
2-5-38:88	Louallier, Ernest	25-3535 Opalipali St.	Hilo	HI 96720	none
2-5-41:108	Ha, Richard Jr. & June	421 Lama St.	Hilo	HI 96720	none
2-5-41:109	Hannum, Charles R. & Una E.	120 Roosevelt St.	Chula Vista	CA 92010	none
2-5-41:111	Torres, Benjamin D. & Laina A.	P.O. Box 11329 (undeliverable address, no listing in ph. bk.)	Hilo	HI 96720	none
2-5-41:112	Mattos, Kevin J. Abel Jr. & Maile L.	184 Kualua Place	Hilo	HI 96720	none
2-5-41:113	Dolan, William R. & Glynnis T.	16-A Railroad Ave.	Hilo	HI 96720	none



2-5-41-40	Dolan, William R. & 116-A Railroad Glynis T. 68.66% IAVC. & Umeda, Kean & Pali 33.33%	Hilo	HI	98720	none
TMK	Owner	City	St.	Zipcode	Lessee
2-5-62-06	Hanapepe Enterprises, Inc., HI, Corp	Honolulu	HI	96814	Ono, Kenneth M. & Feliciano, Joya E et al
2-6-18-04	State of Hawaii	none			DOFAW Forest Reserve
2-6-18-10	State of Hawaii	none			DOFAW Forest Reserve

25. a) State of Hawaii Department of Health,  
Section 401 Water Quality Certification (WQC) Application, has been submitted.  
b) County of Hawaii Grading Permit, has not been submitted.  
c) FEMA Floodplain Amendment (possibly), has not been submitted.



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225 0246

SEP 17 1997  
In Reply Refer To:  
HPD-16E

Mr. Denis R. Lau, P.E., Chief  
Department of Health  
Clean Water Branch  
919 Ala Moana Boulevard, Room 301  
Honolulu, HI 96814

Dear Mr. Lau:

Enclosed is an application for a Section 401 Water Quality Certification for Federal Highway Administration (FHWA) Project A-AD-6(1), Saddle Road, Maunaloa Highway to Milepost 6, Hawaii County, Hawaii. As you will note, portions of the application are incomplete and will be submitted when a contract is let for the first project in 1998.

We are submitting this application now because it is triggered by the submission of the 404 Permit for this project. The FHWA's Memorandum of Understanding (MOU) with the Corps of Engineers for integrating the NEPA and 404 process requires that we submit a 404 Permit for concurrent review with the Environmental Impact Statement. In some instances, as in this case, the procedures outlined in the MOU do not quite fit the development of a project. We anticipate that addendums or supplemental information to this application will need to be submitted when an alignment has been selected and design proceeds.

If you have any questions or need additional information, you may contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924 or Ms. Nancy Burns, Senior Project Engineer, Okalara & Associates at (808) 329-1221. Thank you for your assistance in the development of this project.

Sincerely yours,

*Robert Murrell*  
for Larry D. Henry, P.E.  
Project Development Engineer

Enclosure

cc (w/enclosure):

Mr. Abraham Wong, Division Administrator, FHWA, III Division  
Ms. Nancy Burns, Senior Project Engineer, Okalara & Associates, Kona, HI  
Mr. David Farrell, Chief, Office of Federal Activities, US Environmental Protection Agency, San Francisco, CA Attn: Mr. Dave Carlson

cc (w/o enclosure):

Dr. Kathleen Dadey, U.S. Army Corps of Engineers, Pacific Ocean Division, Ft. Shafter, HI  
Ms. Leslie McCaughy, Project Manager, EcoPlan Associates, Inc., Mesa, AZ, Mesa, AZ



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225 0246

SEP 23 1997  
In Reply Refer To:  
HPD-16E

Mr. Michael D. Wilson  
State Historic Preservation Officer  
Department of Land and Natural Resources  
State Historic Preservation Division  
33 South King Street, 6th Floor  
Honolulu, Hawaii 96813

Attention: Mr. Patrick C. McCoy

Dear Mr. Wilson:

We are in receipt of your letter of July 31, 1997, which responds to our letter of April 10 requesting concurrence with eligibility determinations for the historic properties identified in our study for Federal Highway Administration (FHWA) project A-AD-6(1), Saddle Road, Maunaloa Highway to Milepost 6, Hawaii County, Hawaii. This letter is to initiate discussions regarding your suggested eligibility of sites, effect determinations for eligible sites, and proposed mitigation for impacted sites.

In the interest of brevity, we have prepared our response in tabular format for ease of reference and further discussion. Please refer to the enclosed Attachment 1: Historic Site Eligibility, Criteria, Effect, and Proposed Mitigation, Saddle Road Improvement Project. In general, we are in agreement with the suggested number of sites to be included in the project Area of Potential Effect, as well as the criteria of eligibility for those sites.

Similarly, we believe that your interpretation of the regulations regarding exceptions to the criteria of adverse effect are correct and we are prepared to mitigate resulting adverse effects for the small segment of the linear historic sites which may be impacted. At this time, we can only estimate the order of magnitude of these impacts. Further design studies will be required to delineate exact impacts and specific avoidance or mitigation design plans at each site.

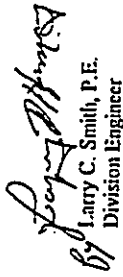
In acknowledging your suggestion that adverse effects on these properties can probably be mitigated because they only impact a relatively small segment of the historic property, we are assuming that you are indicating that the small segment of the linear feature impacted is not required to be preserved in place to maintain the integrity of the site. Further, we are assuming from this response that removal and documentation of that small segment will not significantly impair, alter, or diminish the site's attributes which make it eligible for the National Register.

In addressing the comments contained in Attachment 1 of your letter of July 31, we are authorizing our consultant, Mr. Tom Wolforth, Projects Manager, Hawaii, of PHRI, Inc. to work directly with you and your staff. We are interested in producing a revised report that meets your needs and serves as a valuable future reference. This work will, out of funding necessity, need to be completed at a later date prior to finalization of the Final Environmental Impact Statement.

Regarding the draft social impact assessment report on Native Hawaiian cultural values delivered to your staff in April, in an effort to initiate informal discussions on this topic, we are currently in the process of revising and printing this report in its final form. We will be transmitting this report to you at a later date for your information and use. The FHWA and the author of this report do not consider this study to have any Section 106 applicability.

In closing, we are looking forward to working with you and other native Hawaiian organizations and individuals in developing stipulations for inclusion in a Memorandum of Agreement (MOA) which will ensure that this undertaking can proceed in a responsible manner. Further project development efforts will include site-specific design investigations of avoidance or mitigation plans and specifications to assist in the consummation of the MOA. If you have questions or require further information, please contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924.

Sincerely yours,

  
 Larry C. Smith, P.E.  
 Division Engineer

Enclosures

cc (w/enclosure):

- Mr. Abraham Wong, Division Administrator, FHWA, III Division, Honolulu, HI
  - Ms. Nancy Burns, Senior Project Engineer, Okalana & Associates, Kailua-Kona, HI
  - Mr. Bill Moore, Senior Planner, Okalana & Associates, Hilo, HI
  - Mr. Tom Wolforth, Projects Manager, PHRI Inc., Hilo, HI
  - Mr. Ron Terry, Principal, Geometrician, Keau, HI
  - Ms. Leslie McLaughley, Project Manager, EcoPlan & Assoc., Mesa, AZ
- cc (w/enclosure and correspondence):
- Ms. Carol Gleickman, Historic Preservation Specialist, ACHP Western Region, Lakewood, CO
  - Mr. Merrill Deskins, Environmental Specialist, FHWA, Region 9, San Francisco, CA

HISTORIC SITE ELIGIBILITY, CRITERIA, AND PROPOSED MITIGATION

Attachment 1

Site Number and Description	Eligibility	Effect of Undertaking	Proposed Mitigation
1 2034 - Habitat or Animal Enclosure	Criteria D	Exception to criteria of adverse effect. No Adverse Effect.	Sufficiently well documented, no further study required.
2 2033 - Old Waialeale-Kona Bunk Road	Criteria A, C, D	Entire feature is significant. Breaching by new road will cause Adverse Effect.	Significant feature will be avoided. Impact to 50 m of 1,900 m feature Preservation in place of 50 m not required. Prepare Data Collection Plan and document existing information and data collected.
3 2032 - Native Hawaiian Burial	Criteria D	No impact; site is avoided. No Effect.	Site is avoided and will remain unmarked. Contact Specifications allow no activity outside of stated ROW.
4 3002 - Kahoe Wall	Criteria C, D	Entire feature is significant. Additional breaching by improving existing road will cause Adverse Effect.	Alignment design adjusted to minimize adverse segment resulting in impact to less than 50 m of 610 m feature. Preservation of impacted area not necessary. Prepare Arch Monitoring and Data Collection Plan and document existing information and data collected.
5 1438 - Lava Tube Temporary Shelter	Criteria D	No impact; site is avoided. No Effect.	Site is avoided and will remain unmarked. Contact Specifications allow no activity outside of stated ROW.
6 3003 - Lava Tube Temporary Shelter	Criteria D	No impact; site is avoided. No Effect.	Site is avoided and will remain unmarked. Contact Specifications allow no activity outside of stated ROW.
7 2062 - Lava Rubble Wall	Criteria D	Exception to criteria of adverse effect. No Adverse Effect.	Sufficiently well documented, no further study required.
8 2065 - Wooden & Wire Fence	Criteria D	Exception to criteria of adverse effect. No Adverse Effect.	Sufficiently well documented, no further study required.
9 2077 - Basalt Rubble Wall	Criteria D	Exception to criteria of adverse effect. No Adverse Effect.	Sufficiently well documented, no further study required.
10 2150 - Wares - Humula Wagon Rd	Criteria A, C, D	Entire feature is significant. Breaching by new road will cause Adverse Effect.	Alignment design adjusted to minimize adverse segment resulting in impact to less than 50 m of 3,300 m feature. Preservation of impacted area not necessary. Prepare Data Collection Plan and document existing information and data collected. Post the public and interpretive signs.
11 2119 - Humula Sheep Station Wall(s)	Criteria A, C, D	Entire feature is significant. Breaching by improved road will cause Adverse Effect.	Alignment design adjusted to minimize adverse segment resulting in impact to less than 50 m of 1.1 km feature. Preservation of impacted area not necessary. Arch Monitoring and Data Collection Plan and document existing information and data collected. Publish an interpretive sign.



DEPARTMENT OF THE ARMY  
U.S. ARMY CORPS OF ENGINEERS DISTRICT, HONOLULU  
FORT SHARPER, HAWAII 96860-4410

August 22, 1997

Operations Branch

Mr. Larry C. Smith  
Division Engineer  
U.S. Department of Transportation  
Federal Highway Administration  
555 Zang Street  
P.O. 25246  
Denver, Colorado 80225-0246

Dear Mr. Smith:

This is in response to your August 18, 1997 letter requesting information on the Department of the Army (DA) permit process for the Saddle Road project. Based on the information obtained during the July 2 and 3 field visits and subsequent investigations by Dr. Gerrish mentioned in your letter, the Corps has determined that the discharge of dredged or fill material into waters of the U.S. associated with the proposed road will be processed as a standard individual permit application. Expected impacts to special aquatic sites (wetlands) are more than minor. Therefore, authorization under the Corps Nationwide permit program is not appropriate. We would appreciate the opportunity to review the re-written "Waters of the U.S./Wetlands" section of the Draft Environmental Impact Statement (DEIS) prior to publication of the DEIS.

The limit of the Corps jurisdiction in both perennial and ephemeral water courses in the "ordinary high water mark" (OHWM), defined at 33 CFR 328.3(e). That is, the Corps has regulatory jurisdiction over the discharge of dredged or fill material below the OHWM. In the absence of evidence of an OHWM, the Corps has no jurisdiction. Such is the case in the intermittent streams observed in Pohakuloa Training Area and further west. Although it is obvious that significant volumes of water flowed in the past, current flows are insufficient to create an OHWM.

Finally, we caution you regarding further consideration of alternative EX-3, E-3 which is estimated to result in approximately 25% greater impacts (in terms of acreage) to waters of the U.S. than alternative EX-3, E-4A. The 404(b)(1) Guidelines prohibit discharges if there is a practicable alternative which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences. An alternative

**COPY**

ORIGINAL FILED

IN 91024-10-10678

HISTORIC SITE ELIGIBILITY, CRITERIA, AND PROPOSED MITIGATION

Attachment 1 (cont)

Site Number and Description	Eligibility	Effect of Undertaking	Proposed Mitigation
12 20809 - Puv Oo to Volcano Trail	Criteria A, C, D	Entire feature is significant. Expansion of existing breach by improved road will cause adverse effect.	Alignment design adjusted to minimize adverse impact resulting in impact to less than 10 m of 33 km feature. Preservation of impacted area not necessary. Prepare Data Collection Plan and document existing information and data collected. Conduct pullout & interpretive signing.
13 20836 - Cobble Terrace	Criteria D	No impact site is avoided. Exception to criteria of adverse effect. No adverse effect.	Sufficiently well documented, no further study required.
14 20878 - Hilo to Puv Oo Trail	Criteria A, C, D	Entire feature is significant. Expansion of existing breach by improved road will cause adverse effect.	Alignment design adjusted to minimize adverse impact resulting in impact to less than 200 m of 2,650 m feature. Preservation of impacted area not necessary. Prepare Data Collection Plan and document existing information and data collected. Conduct pullout & interpretive signing.
15 20864 - Old Saddle Road	Criteria A, D	Entire feature is significant. Expansion of existing breach by improved road will cause adverse effect.	Alignment design adjusted to minimize adverse impact resulting in impact to less than 10 m of 3,000 m feature. Preservation of impacted area not necessary. Prepare Data Collection Plan and document existing information and data collected. Conduct pullout & interpretive signing.
16 20869 - Cane Survey Station	Criteria D	Exception to criteria of adverse effect. No adverse effect.	Sufficiently well documented, no further study required.
17 20870 - Oka's Puna	Criteria A, D	Entire feature is significant. No impact in existing corridor. No Effect. Consider E-3 breaching will cause adverse effect.	Impact to 10 m of 23 km feature. Preservation in place of 50 m not required. Prepare Data Collection Plan and document existing information and data collected. Conduct pullout with interpretive signing and possible re-fill sections for e-bike.
18 20872 - Hilo County Club	Criteria D	Exception to criteria of adverse effect. No adverse effect.	Sufficiently well documented, no further study required.
19 20873 - Senator Kimo's House	Criteria D	Exception to criteria of adverse effect. No adverse effect.	Sufficiently well documented, no further study required.



**Okahara & Associates, Inc.**  
ENGINEERING CONSULTANTS

is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics.

File Number 960010042 is assigned to this project. Please refer to this number in any correspondence with us. Please feel free to contact Ms. Kathleen Dadey of my Operations staff at (808) 438-9258, extension 15, if you have any further questions.

Sincerely,

Ray H. Jyo, P.E.  
Director of Engineering  
and Technical Services

Copies Furnished:  
U.S. Fish and Wildlife Service, Honolulu, HI  
U.S. Environmental Protection Agency, San Francisco, CA  
U.S. Environmental Protection Agency, Region 9, San Francisco, CA  
Federal Highways Administration, Hawaii Division, Honolulu, HI  
Federal Highways Administration, Daniel K. Inouye, Honolulu, HI  
Office of U.S. Senator Daniel K. Inouye, Honolulu, HI  
State Department of Transportation, Honolulu, HI  
Okahara and Associates, Hilo, HI

September 3, 1997  
Letter No. 1359  
Reference No. 97024

To:	Reggie David	RANA Productions, Ltd.
	Neal Evenhuis	Bishop Museum
	Winona Clar	Char & Associates
	Rexford Palmer	Palmer & Associates Consulting
	Tom Wofforth	PIIKI
	Youngki Hahn	Y.K. Hahn & Associates
	Robin Lim	Geolabs Hawaii
	Byron Donaldson	Donaldson Enterprises, Inc.
	Bob Lee	R.M. Towill, Inc.
	Bob Shirai	Island Survey
	Leslie McCaughey	EcoPlan Associates, Inc.
	Bill Moore	Okahara & Associates, Inc.
	Debbie Baker	Current Events
	Bert McCauley	FIWA-Denver
	Glenn Yasui	FIWA-Honolulu
	Ren Terry	Geo Metrician
	Grant Gerrish	

Project: ENVIRONMENTAL STUDIES ON HI A-AD-6, SADDLE ROAD

Subject: Federal Highways Administration and Okahara & Associates, Inc.,  
Engineering Consultants Request for Right-of-Entry to Various  
Government Lands on the Island of Hawaii  
Hawaii Defense Access Road - Saddle Road Project (A-AD-6(1))

There may be occasion for additional site work required as we proceed with the EIS for the Saddle Road project. This is to remind you that we still need to notify land owners prior to entering private and government lands. We have just extended our right-of-entry privilege to enter State lands to December 1998. However, we must follow their procedures.



Page 2  
Letter No. 1359  
Reference No. 97024

Please read the attached letter from the State of Hawaii, Department of Land and Natural Resources, dated August 21, 1997, and sign the form provided. The forms may be faxed to 329-1006 or mailed to Okahara & Associates, Inc., 73-5574 Maiiau Street, Bay 6B, Kailua-Kona, Hawaii, 96740. I would appreciate your acknowledgment by Friday, September 12. If you plan to conduct site work please notify Okahara's Kona office to arrange for permission to enter private or government property. Should you have any questions please call me at 329-1221.

Sincerely,




Nancy E. Burns, P.E.  
Project Engineer

NEB:tm

cc: Donald K. Okahara, P.E., Okahara & Associates, Inc.

### ACKNOWLEDGEMENT

I the undersigned, agree to the terms and conditions in the attached letter, from the State of Hawaii, Department of Land and Natural Resources, dated August 21, 1997, permitting access to State Lands.

  
Signature

FHWA  
Company

9-8-97  
Date

2 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
Land Division  
Honolulu, Hawaii 96813

August 21, 1997

Board of Land and Natural Resources  
State of Hawaii  
Honolulu, Hawaii 96813

SUBJECT: Federal Highways Administration and Okahara and Associates, Inc., Engineering Consultants Request for Right-of-Entry to Various Government Lands on the Island of Hawaii Hawaii Defense Access Road - Saddle Road Project [A-AD-6(1)]

By letter dated August 11, 1997, Okahara and Associates, Inc., Engineering Consultants (O/A) and the Federal Highways Administration (FHWA) have requested a reissuance of a right-of-entry to various government lands in conjunction with the Hawaii Defense Access Road, Saddle Road Project [A-AD-6]. The purpose of the right-of-entry is to complete necessary environmental studies, environmental surveys, preliminary engineering and survey work in conjunction with the subject project. A previous right-of-entry was approved by the Board of Land and Natural Resources at its meeting of March 24, 1995, Agenda Item P-3 for the same purpose but expired on June 30, 1996.

While the initial field work and scientific studies were completed prior to June 30, 1996, they have found that additional field work is required to finalize the draft EIS and as well as to address issues that may be raised prior to the completion of the final EIS. The only change from the previous right-of-entry will be the substitution of Okahara and Associates, Inc. as primary consultant/contractor instead of RUST Environment and Infrastructure.

The scope of work to be conducted during this right-of-entry will be as follows:

Request for Right-of-Entry  
Saddle Road Project  
Page 2

1. To perform horizontal and vertical surveys and to conduct a topographic survey which determines the positions of natural and artificial features within and adjacent to the proposed project. The information obtained from these surveys is needed for the design phase of the project development process.
2. To replace centerline and right-of-way stakes for the proposed project as required.
3. To conduct and update environmental surveys which include, but are not limited to, cultural resource survey, survey and removal of unexploded ordinance, and biological, wildlife, botanical, invertebrate, wetlands and other survey work necessary for the completion of the EIS.

RECOMMENDATION:

That the Board grant to the Federal Highways Administration (FHWA), Okahara and Associates, Inc. (O/A) - primary consultant/contractor, its subconsultants and/or its subcontractors, a right-of-entry to the above listed government lands to conduct the necessary environmental studies, environmental surveys, preliminary engineering work, topographic survey, centerline and right-of-way staking, the placement of temporary aerial target panels, etc. for the preparation of a Conservation District Use Application and the preparation of a Draft Environmental Impact Statement for the Hawaii Defense Access Road, Saddle Road Project, subject to the following terms and conditions:

1. The FHWA and O/A, its sub-consultants and/or sub-contractors shall obtain and submit to the Hawaii District Land Office written concurrence to the right-of-entry from all of the above-listed lessees, permittees, holders of Executive Orders/Proclamation, etc., prior to entry onto the subject property.



Request for Right-of-Entry  
Saddle Road Project  
Page 5

11. The State of Hawaii shall not be responsible for any loss, liability, claim or demand for property damage, personal deposits, human burials, rock or coral alignments, pavings, or walls are encountered while conducting any activity, FHWA, O/A, its sub-consultants, and/or sub-contractors shall stop work immediately and contact the State Historic Preservation Division in Honolulu at (808) 587-0047.

12. This right-of-entry is effective till December 31, 1998 or upon the completion of the studies, whichever occurs first.

13. Should any of the studies/surveys permitted under this right-of-entry discover the presence of any threatened/endangered species or habitat, any archaeological sites, burials, hazardous waste and/or any significant discovery on any of the above-listed parcels, the FHWA, O/A, its sub-consultant and/or sub-contractor shall provide to the lessee, permittee, holder of the executive order or proclamation, or to the Land Management Administrator in the case of unincumbered lands, the pertinent portion of the studies/surveys which shall at the minimum identify the discovery, provide the location and remedial/preventative actions taken. A copy of all such studies/surveys shall be provided to the Chairperson.

14. That the issuance of this right-of-entry does not in any way express support for FHWA's and O/A's proposed Saddle Road Project, nor does it imply that any other approvals and/or disposition of land is forthcoming.

15. Should FHWA, O/A, its sub-consultants and/or sub-contractors fail to comply with any of the terms and conditions of this right-of-entry, this right-of-entry shall be immediately canceled.

Request for Right-of-Entry  
Saddle Road Project  
Page 6

16. The Department of Land and Natural Resources reserves the right to impose additional terms and conditions at any time if it deems it necessary.

17. Governor's concurrence required for all executive order properties.

18. Such other terms and conditions as may be prescribed by the Chairperson which are in the best interest of the State of Hawaii.

Respectfully Submitted,

  
Harry Yoda  
Land Agent

APPROVED FOR SUBMITTAL:

MICHAEL D. WILSON, Chairperson



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

OCT 15 1997

In Reply Refer To:  
HPD-16E(Saddle Road)

Mr. Gary Gill  
Director

Office of Environmental Quality Control  
220 South King Street  
Honolulu, HI 96813

Dear Mr. Gill:

The U.S. Department of Transportation, Federal Highway Administration (FHWA), Central Federal Lands Highway Division (CFLHD), in cooperation with the Hawaii Department of Transportation (HDOT), has completed a Draft Environmental Impact Statement for proposed Defense Access Road project A-AD-6(1), Saddle Road (SR 200), from the Manalohoa Highway (SR 190) to Mile Post 6 near Hilo. The CFLHD and HDOT, along with other agencies involved in project development, have reviewed the document and have determined that it satisfactorily complies with Chapter 343, HRS, and Title 11, Chapter 200, HAR.

Enclosed are five (5) copies of the Draft EIS, a publication notice for the *OEQC Environmental Notice*, and a distribution list for the EIS. We trust that the content and timing of this submittal will permit publication of the availability of the Draft EIS in the November 8, 1997 edition of the *Notice*. Please contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924, if you have any questions.

Sincerely yours,

Larry D. Henry, P.E.  
Project Development Engineer

Enclosures

cc (w/enclosure):

Honorable Daniel K. Inouye, U.S. Senator, 300 Ala Moana Blvd., Suite 7225, Honolulu, HI 96850  
Honorable Benjamin Cayetano, Governor, State of Hawaii, State Capitol, Honolulu, HI 96813  
Mr. Kazu Hayashida, Director, HDOT, 869 Punchbowl Street, Honolulu, HI 96813-5097  
Mr. Abraham Y. Wong, Division Administrator (IAD-HI), FHWA, Box 50206, Honolulu, HI 96850  
Mr. Donald Okahara, Principal, Okahara & Associates, 200 Kohola Street, Hilo, HI 96720

**OEQC ENVIRONMENTAL NOTICE PUBLICATION FORM**

TITLE OF PROJECT: Saddle Road Improvement

LOCATION: ISLAND Hawaii DISTRICT Hilo  
TAX MAP KEY: 3rd District: Various Zones, Sections, Plats & Parcels

PLEASE CHECK THE FOLLOWING CATEGORIES:

Type of Action: Agency  Applicant   
Applicable state of Federal Statute:  
 Chapter 343, HRS Chapter 205A, HRS  NEPA  
Type of Document  
 Draft Environmental Assessment (Negative Declaration Antic.)  Draft EIS  NEPA HOP  
 Final Environmental Assessment  Final EIS  NEPA Draft EIS  
 Final Environmental Assessment (EIS Preparation Notice)  NEPA FONSI  NEPA Final EIS  
Type of Revision (if applicable)  
Revised  Supplemental  Addendum  Other (explain)  
Prior to general distribution, please submit to OEQC: 4 copies of the Draft EA, Final EA (Negative Declaration or EIS Preparation Notice), 4 copies of the Draft EIS or Final EIS (for Draft and Final EIS an additional copy is mailed to OEQC)  
PROPOSING AGENCY OR APPLICANT SHOULD SUBMIT COPIES OF THE DOCUMENTS TO THE APPROVING AGENCY OR ACCEPTING AUTHORITY PRIOR TO SUBMITTING COPIES TO OEQC.

APPROVING AGENCY OR ACCEPTING AUTHORITY:

Governor, State of Hawaii

ADDRESS: State Capitol  
Honolulu, HI 96813

CONTACT: Benjamin Cayetano

PHONE: (808) 586-0034

PROPOSING AGENCY OR APPLICANT:

Federal Highway Administration

ADDRESS: 555 Zang Street  
Lakewood, CO 80228

CONTACT: Bert McCauley

PHONE: (303) 969-5924

CONSULTANT:

Okahara & Associates

ADDRESS: 200 Kohola Street  
Hilo, HI 96720

CONTACT: Donald Okahara

PHONE: (808) 961-5527

COMBENT PERIOD END DATE:

December 22, 1997



US Department  
of Transportation  
Federal Highway  
Administration

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

Central Federal Lands  
Highway Division

**OCT 15 1997**  
In Reply Refer To:  
HPD-16E(Saddle Road)

U.S. Environmental Protection Agency  
Office of Federal Activities  
NEPA Compliance Division, EIS Filing Section  
Ariel Rios Building (South Oval Lobby)  
Mail Code 2252-A, Room 7241  
1200 Pennsylvania Avenue, NW  
Washington, DC 20044

Attention: Ms. Pearl Young

Gentlemen:

Pursuant to your conversation with Mr. Bert McCauley of this office on October 14, we are enclosing five (5) copies of the Draft Environmental Impact Statement (DEIS) and five (5) copies of the complete Technical Appendices for the proposed improvement of Hawaii State Route 200 (SR 200), Saddle Road, from the Mamelahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawaii. To meet our Public Hearing schedule and close of a comment deadline in December, we are requesting publication in the Federal Register of a *Notice of Availability* for this DEIS on Friday, November 7, 1997.

Public Hearings will be held at the following locations for the dates and times given:

Thursday, December 11, 1997, 7:00 - 10:00 P.M.  
Royal Waikoloa, King's Ballroom  
60-275 Waikoloa Beach Drive  
Waikoloa, Hawaii

Saturday, December 13, 1997, 9:00 - 12:00 P.M.  
University of Hawaii-Hilo, Wentworth 1  
200 West Kawili Street  
Hilo, Hawaii

Copies of the DEIS are available for public review at the following locations:

Federal Highway Administration, 555 Zang St., Lakewood, CO  
Federal Highway Administration, Hawaii Div., Federal Bldg., Punchbowl St., Honolulu, HI;  
Hawaii Dept. of Transportation, 600 Kapiolani Blvd., Honolulu, HI;  
County of Hawaii, 25 Aupuni St., Hilo, HI;  
U.S. Army Garrison-Hawaii, Dept. of Public Works, Bldg. 300, Schofield Barracks, HI;  
U.S. Army Garrison-Pohakuloa Training Area, Milepost 36, State Route 200, Hilo, HI; and

CONDITIONS WHICH TRIGGERED THE EIS LAW: PLEASE CHECK ALL THAT APPLY TO THE PROPOSED ACTION:

- Use of State or County lands or funds  
HRS 343-5(a)(1)
- Use of Conservation District Lands  
HRS 343-5(a)(2)
- Use of Shoreline Setback Area  
HRS 343-5(a)(3)
- Use of Historic Site or District  
HRS 343-5(a)(4)
- Use of lands in the Waikiki Special District  
HRS 343-5(a)(5)
- Amendment to a County General Plan  
HRS 343-5(a)(6)
- Reclassification of Conservation Lands  
HRS 343-5(a)(7)
- Construction or modification of helicopter facilities  
HRS 343-5(a)(8)

OTHER CONDITIONS:

- Use of Special Management Area (City and County of Honolulu)
- Other\*

\* If the project does not trigger HRS 343, please explain why document is being submitted to OEQC.

SUMMARY of the proposed action or project to be published in the OEQC Bulletin. Please submit it as a summary ready for publication. The description should be brief (300 words or less), yet provide sufficient detail to convey the full impact of the proposed action.

The project proposes to improve Saddle Road (SR 200) between the Mamelahoa Highway (SR 190) and Mile Post 6 near Hilo, Hawaii. Twelve action alternatives under consideration incorporate use of the existing alignment and potential new alignments. The action alternatives reconstruct the existing substandard two-lane roadway to a two-lane roadway with shoulders to adequately handle an anticipated year 2014 average daily traffic volume of 14,000 vehicles per day at a design speed of 80 to 100 kilometers per hour. The existing Saddle Road is a narrow two-lane road with steep grades, sharp curves, and poor pavement with no shoulders and passes through key training areas of the U.S. Department of the Army's Pohakuloa Training Area (PTA), creating conflict between motorists and military training units. The proposed project will improve pavement condition, increase safety and capacity, improve quality of traffic flow, decrease cross-island travel times, and stimulate economic growth and development. Some alternatives will realign the road within the PTA to minimize conflicts between military and public uses. Substantive issues include protected species of flora and fauna, Critical Habitat for the Endangered Palila, wetlands and biological habitats of importance, archaeological resources, fire hazards, potential residential displacements, and traffic noise.

Donna Fay K. Kiyosaki  
Chief Engineer  
Jim A. Sasaki  
Deputy Chief Engineer



Stephen K. Yamashiro  
Mayor

**County of Hawaii**  
**DEPARTMENT OF PUBLIC WORKS**  
25 Aupuni Street, Room 202 • Hilo, Hawaii 96720-4252  
(808) 961-4321 • Fax: (808) 961-8610

October 17, 1987

**MEMORANDUM**

**TO:** Council Chair James Amaki and Council Members  
Hawaii County Council

**FROM:** Donna Fay K. Kiyosaki, Chief Engineer

**SUBJECT:** SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

As the County's representative on the Saddle Road Project's Social, Economic and Environmental (SEE) Team, I am pleased to inform you that the Draft Environmental Impact Statement (DEIS) for the Saddle Road Project has been completed. Notice of availability of the DEIS is scheduled for publication in the Office of Environmental Quality Commission's Environmental Notice on November 8, 1987. Copies of the DEIS are in the process of being mailed and should be in hand prior to the November 8, 1987 OEQC publication.

In order to facilitate your review of the DEIS, a workshop has been scheduled. The purpose of this workshop is to provide you with an overview of the DEIS organization, purpose and need, alternatives, and key findings and recommendations, including proposed mitigation measures. The workshop date and time is as follows:

**Place:** County Council Room  
**Date:** Wednesday, October 28, 1987  
**Time:** 10:00 a.m. to noon

The workshop participants include Bert McCauley, Federal Highway Administration's (FHWA) Project Manager, and key consultants who prepared the report. If you have any questions on this matter, please feel free to call me.

**cc:** Bert McCauley, FHWA

the following libraries:

- Kaimuki Regional Library,
- Pearl City Regional Library,
- Hamilton Library at UH at Manoa,
- Kailua-Kona Public Library,
- Kaneohe Regional Library,
- UH Hilo Campus Library,
- Sinclair Library at UH at Manoa,
- Hilo Public Library,
- Hawaii State Library,
- Kahului Regional Library, and the
- Thelma Parker Memorial Library.

If additional information is required, please contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924. Thank you for your assistance.

Sincerely yours,

Larry D. Henry, P.E.  
Project Development Engineer

- cc (w/o enclosures):
- Honorable Daniel K. Inouye, U.S. Senator, 300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850
- Mr. Kazu Hayashida, Director, HDOT, 869 Punchbowl Street, Honolulu, HI 96813-5097
- Mr. Abraham Y. Wong, Division Administrator (HAD-HI), FHWA, Box 50206, Honolulu, HI 96850
- James Col. Owen D. Byatt, <sup>Hawaii</sup>Commander, HQ, U.S. Army Garrison-Hawaii, Attn: APVG-GC, Bldg. 580, Room 100, Schofield Barracks, HI 96857-5000
- LTC David Hergenroeder, Commander, HQ, PTA, USAG-HI, Bldg T-180, Milepost 36, H200 (Saddle Road), Hilo, HI 96720
- Ms. Donna Fay K. Kiyosaki, Chief Engineer, Hawaii County Department of Public Works, 25 Aupuni St., Room 202, Hilo, HI 96720-4252
- Mr. Donald Okahara, Principal, Okahara & Associates, 200 Kohola St., Hilo, HI 96720

10/21/97 08:49 FAX 1 808 329 1006

OKAIIARA-KONA

002

10/21/97 08:49 FAX 1 808 329 1006

OKAIIARA-KONA

004

Stephen K. Yamashiro  
Mayor



Donna Fay K. Kiyosaki  
Chief Engineer  
Jiro A. Sumida  
Deputy Chief Engineer

Stephen K. Yamashiro  
Mayor



Donna Fay K. Kiyosaki  
Chief Engineer  
Jiro A. Sumida  
Deputy Chief Engineer

**County of Hawaii**  
DEPARTMENT OF PUBLIC WORKS  
25 Aupuni Street, Room 202 • Hilo, Hawaii 96720-4222  
(808) 961-8111 • Fax: (808) 961-8650

**County of Hawaii**  
DEPARTMENT OF PUBLIC WORKS  
25 Aupuni Street, Room 202 • Hilo, Hawaii 96720-4222  
(808) 961-8111 • Fax: (808) 961-8650

October 17, 1997

October 17, 1997

**MEMORANDUM**

**MEMORANDUM**

TO: Stephen K. Yamashiro, Mayor  
Virginia Goldstein, Planning Director  
Wayne G. Carvacho, Police Chief  
Nelson M. Tsuji, Fire Chief  
Hany Kim, Civil Defense Administrator

TO: Connie Kiritu, Legislative Auditor  
FROM: Donna Fay K. Kiyosaki, Chief Engineer

FROM: Donna Fay K. Kiyosaki, Chief Engineer

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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cc: Bert McCauley, FHWA

cc: Bert McCauley, FHWA

10/21/97 08:49

002

10/21/97 08:49

004



10/21/97 08:49 FAX 1 808 329 1000

OKAIAKA-KONA

10/21/97 08:49 FAX 1 808 329 1000

OKAIAKA-KONA

0009

Stephen K. Yamashiro  
Mayor



**County of Hawaii**  
DEPARTMENT OF PUBLIC WORKS  
23 Aupuni Street, Room 202 - 11th, Honolulu HI 96720-4152  
(808) 961-8321 • Fax (808) 961-4030

October 17, 1997

MR EDWARD ANDRADE  
EAST HAWAII DISTRICT MANAGER  
DEPARTMENT OF HAWAIIAN HOME LANDS  
160 BAKER AVENUE  
HILO HI 96720

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

Stephen K. Yamashiro  
Mayor



**County of Hawaii**  
DEPARTMENT OF PUBLIC WORKS  
23 Aupuni Street, Room 202 - 11th, Honolulu HI 96720-4152  
(808) 961-8321 • Fax (808) 961-4030

October 17, 1997

MR ALAN TAKEYA  
DIVISION OF STATE PARKS  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
75 AUPUNI STREET  
HILO HI 96720

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

10/21/97 08:49 FAX 1 808 329 1008

OKAIAHA-KONA

0008

10/21/97 08:49 FAX 1 808 329 1008

OKAIAHA-KONA

0007

Stephen K. Yamashiro  
Mayor



**County of Hawaii**

DEPARTMENT OF PUBLIC WORKS  
23 Aupuni Street, Room 203 • Hilo, Hawaii 96720-4121  
(808) 961-6321 • Fax (808) 961-6630

October 17, 1997

MR MARC SMITH  
DIVISION OF HISTORIC PRESERVATION  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
75 AUPUNI STREET ROOM 204  
HILO HI 96720

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

Stephen K. Yamashiro  
Mayor



**County of Hawaii**

DEPARTMENT OF PUBLIC WORKS  
23 Aupuni Street, Room 203 • Hilo, Hawaii 96720-4121  
(808) 961-6321 • Fax (808) 961-6630

October 17, 1997

MR JON GIFFIN  
DIVISION OF FORESTRY AND WILDLIFE  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
10 EAST KAWILI STREET  
HILO HI 96720

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

10/21/87 08:49 FAX 1 808 329 1008

OKAIAWA-KONA

0008

Stephen K. Yamashiro  
Mayor



**County of Hawaii**

**DEPARTMENT OF PUBLIC WORKS**  
23 Aupuni Street, Room 204 - Hilo, Hawaii 96720-4222  
(808) 961-8331 - Fax (808) 961-8630

October 17, 1987

MS CHARLENE UNOKI  
HAWAII LAND AGENT  
DIVISION OF LAND AND MANAGEMENT  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
73 AUPUNI STREET ROOM 204  
HILO HI 98720

**SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT**

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*Donna Fay K. Kiyosaki*  
DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

Donna Fay K. Kiyosaki  
Chief Engineer  
Jiro A. Sasaki  
Deputy Chief Engineer

10/21/87 08:49 FAX 1 808 329 1000

OKAIAWA-KONA

0005

Stephen K. Yamashiro  
Mayor



**County of Hawaii**

**DEPARTMENT OF PUBLIC WORKS**  
23 Aupuni Street, Room 202 - Hilo, Hawaii 96720-4231  
(808) 961-8331 - Fax (808) 961-8630

October 17, 1987

MR STANLEY TAMURA  
ACTING DISTRICT ENGINEER  
HIGHWAYS DIVISION HAWAII DISTRICT  
DEPARTMENT OF TRANSPORTATION  
50 MAKAALA STREET  
HILO HI 96720

**SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT**

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*Donna Fay K. Kiyosaki*  
DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

10/21/87 08:49 FAX 1 808 328 1006

OKAIAIPA-KONA

0111

10/21/87 08:49 FAX 1 808 328 1006

OKAIAIPA-KONA

0112

Stephen K. Yonashiro  
Mayor



**County of Hawaii**

DEPARTMENT OF PUBLIC WORKS  
23 Aupuni Street, Room 202 - Hilo, Hawaii 96720-4332  
(808) 941-8311 • Fax: (808) 941-8630

October 17, 1987

MR. HERRING KALUA, COMMISSIONER  
DEPARTMENT OF HAWAIIAN HOME LANDS  
C/O EAST HAWAII DISTRICT OFFICE  
160 BAKER AVENUE  
HILO HI 96720

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

Stephen K. Yonashiro  
Mayor



**County of Hawaii**

DEPARTMENT OF PUBLIC WORKS  
23 Aupuni Street, Room 202 - Hilo, Hawaii 96720-4332  
(808) 941-8311 • Fax: (808) 941-8630

October 17, 1987

MR. JIM DUPONT, DISTRICT MANAGER  
WEST HAWAII DISTRICT OFFICE  
DEPARTMENT OF HAWAIIAN HOME LANDS  
PO BOX 125  
KAMUELA HI 96743

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

Donna Fay K. Kiyosaki  
Chief Engineer  
Jiro A. Sumada  
Deputy Chief Engineer



**County of Hawaii**  
DEPARTMENT OF PUBLIC WORKS  
23 August Street, Room 202 • Hilo, HI 96720-4251  
(808) 961-8321 • Fax (808) 961-8430

Stephen K. Yamashiro  
Mayor

October 17, 1997

MR DAVID HEAUKULANI  
EXECUTIVE OFFICER  
POHAKULOA TRAINING AREA  
APO AP 96558-5743

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

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*Donna Fay K. Kiyosaki*  
DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA

Donna Fay K. Kiyosaki  
Chief Engineer  
Jiro A. Sumada  
Deputy Chief Engineer



**County of Hawaii**  
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(808) 961-8321 • Fax (808) 961-8430

Stephen K. Yamashiro  
Mayor

October 17, 1997

MR DICKIE NELSON COMMISSIONER  
DEPARTMENT OF HAWAIIAN HOME LANDS  
C/O WEST HAWAII DISTRICT OFFICE  
PO BOX 125  
KAMUELA HI 96743

SUBJECT: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

As the County's representative on the Saddle Road Project's Social, Economic and Environmental (SEE) Team, I am pleased to inform you that the Draft Environmental Impact Statement (DEIS) for the Saddle Road Project has been completed. Notice of availability of the DEIS is scheduled for publication in the Office of Environmental Quality Commission's Environmental Notice on November 6, 1997. Copies of the DEIS are in the process of being mailed and should be in hand prior to the November 6, 1997 OECC publication.

In order to facilitate your review of the DEIS, a workshop has been scheduled. The purpose of this workshop is to provide you with an overview of the DEIS organization, purpose and need, alternatives, and key findings and recommendations, including proposed mitigation measures. The workshop date and time is as follows:

Place: County Council Room  
Date: Wednesday, October 29, 1997  
Time: 10:00 am to noon

The workshop participants include Bert McCauley, Federal Highways Administration's (FHWA) Project Manager, and key consultants who prepared the report. If you have any questions on this matter, please feel free to call me.

*Donna Fay K. Kiyosaki*  
DONNA FAY K. KIYOSAKI, P.E.  
Chief Engineer

cc: Bert McCauley, FHWA



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

NOV 06 1997  
In Reply Refer To:  
HFD-16E, Saddle Road

Mr. Robert P. Smith, Manager  
Pacific EcoRegion  
US Fish and Wildlife Service  
PO Box 50088  
Honolulu, Hawaii 96850

Attention: Mr. Brooks Harper

Dear Mr. Smith:

As you are aware, the report entitled *Biological Assessment of the Hamakua State Route 200 - Manalaloa Highway to Milepost 6, Saddle Road Realignment Project, Island of Hawaii, Hawaii*, September 15, 1997 has been transmitted to your office under separate cover. This letter is to request the initiation of formal consultation as specified in 50 CFR Part 402.14 (c) for the proposed Saddle Road project from the Manalaloa Highway (SR 190) to Milepost 6 near Elio, Hawaii.

The aforementioned Biological Assessment (BA) has been submitted within Volume III of the Technical Appendices for the Draft Environmental Impact Statement (DEIS). The DEIS and appendices containing supporting biological studies were submitted concurrently with the BA and contain additional information on species not appropriate for inclusion in the BA, as well as the proposed project's affected environment, environmental consequences, and associated mitigation measures.

As you know, the Federal Highway Administration has been actively involved in informal consultation with the Service since early 1996 during which it was concluded that the proposed project was likely to adversely affect designated critical habitat of the Palila (*Loxioides bailoni*). In this instance, mitigation measures addressing this affect were developed with the guidance and unswerving cooperation of the Service affording the opportunity to develop a responsive Biological Opinion without undue effort. We believe that this cooperative effort is a positive example of how Section 7 consultation is intended to function.

If you require additional information or have questions regarding this request, please contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924.

Sincerely yours,

**LARRY D. HENRY**

Larry C. Smith, P.E.  
Division Engineer

cc: Mr. Tom Dwyer, Deputy Regional Director, Region 1, USFWS, 911 NE 11<sup>th</sup> Street,  
Portland, Oregon 97232-4181  
Maj. Gen. Alexis T. Lum (Ret.), Executive Assistant, Office of Senator Daniel K. Inouye,  
Honolulu, HI  
Mr. Abraham Y. Wong, Division Administrator, FHW, III Div., Honolulu, HI  
Mr. Donald Okalata, Principal, Okalata & Associates, Iilo, HI  
bc: D. Geddon  
R. Cushing  
B. McCauley  
yc: reading file  
Central file - HIA-AD-06, Saddle Road  
BMcCauley:jm:11/5/97:I:\Environment\wp\1a006\formal\_7.ltr

BMc





US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

DEC 15 1997

In Reply Refer To:  
HPD-16E, Saddle Road

Mr. Dave Carlson  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
Code CMD-2  
San Francisco, CA 94105

Dear Mr. Carlson:

In accordance with your conversation on December 11, 1997 with Bert McCauley, Environmental Project Manager for the Saddle Road Project, this is to inform you that the Central Federal Lands Highway Division will grant an extension until January 16, 1997 to the Environmental Protection Agency for delivery of your comments on the Draft EIS for this project. We understand that this extension is needed to solidify your comments in the light of discussions at the above meeting regarding segmental ratings for the proposed project.

If you have any questions or require further information, you may contact Bert McCauley at (303) 969-5924. Thank you for your willingness to work with us on this important issue.

Sincerely yours,

*Robert Marshall*

for Mr. James W. Keeley, P.E.  
Project Development Engineer

cc: Nancy Burns, Senior Project Engineer, Okalana & Associates, Kailua-Kona, HI  
McNill Deskins, Environmental Specialist, FHWA, Region 9, San Francisco, CA

BERNARD J. CARROLL  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
STATE HISTORIC PRESERVATION DIVISION  
33 SOUTH KING STREET, 6TH FLOOR  
HONOLULU, HAWAII 96813

REF:HP-AMK

DEC 22 1997

Mr. Larry D. Henry, Project Development Engineer  
Federal Highway Administration  
555 Zang Street, Room 259  
Lakewood, CO 80228

Attn: HPD-16, Saddle Road

Dear Mr. Henry:

**SUBJECT:** Draft Environmental Impact Statement for Saddle Road  
(State Route 200) Mamalaona Highway (State Route 190) to Milepost 6  
County of Hawaii, State of Hawaii

LOG NO: 20675  
DOC NO: 9712FN105

MICHAEL D. WILSON, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES

DIVISIONS  
OFFICE OF CULTURAL AFFAIRS  
ADULT CARE DIVISION  
ADULT SERVICES PROGRAM  
ADULT RESOURCES  
CONSERVATION AND  
RESOURCES DEVELOPMENT  
COMMUNITY AND WELFARE  
HISTORIC PRESERVATION  
DIVISION  
LAND AND WATER  
MANAGEMENT  
WATER AND LAND DEVELOPMENT

Thank you for your letter of October 15, 1997 and the opportunity to review and comment on the above referenced document.

As indicated in our review letter of July 31, 1997 on the draft archaeological inventory survey report, we believe that the survey of the proposed project area was adequate, finding a total of 16 significant historic sites. When we have had an opportunity to review the revised report we will probably agree with all of the proposed mitigation measures as outlined in the DEIS for these sites and three others located in relatively close proximity but beyond the area of potential effect. The final mitigation measures will then be stipulated in a Memorandum of Agreement.

Our office looks forward to receiving the ethnographic report on the possible traditional cultural properties alluded to in Appendix B, "Indigenous Hawaiian Cultural Values."

Aloha,

*Michael D. Wilson*

MICHAEL D. WILSON, Chairperson and  
State Historic Preservation Officer

PM:amk





United States Department of the Interior

FISH AND WILDLIFE SERVICE  
PACIFIC ISLANDS ECOREGION  
300 ALA MOANA BOULEVARD, ROOM 3108  
BOX 50088  
HONOLULU, HAWAII 96850  
PHONE: (808) 541-3441 FAX: (808) 541-3470

In Reply Refer To: MISS

DEC 29 1997

Mr. Larry Smith, P.E.  
Division Engineer  
U.S. Department of Transportation  
Federal Highways Administration  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Smith:

The Honolulu office of the Fish and Wildlife Service (Service) received a copy of the Biological Assessment (BA) and your cover letter dated November 06, 1997 on November 12, 1997, requesting initiation of formal section 7 consultation under the Endangered Species Act. The consultation concerns the possible effects of the proposed improvement of State Route 200, Saddle Road, from the Mamalahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawaii, on the listed and proposed species of the island of Hawaii and designated critical habitat of the palila (*Loxioides bailleui*).

All of the information required of you (50 CFR 402.14) to initiate consultation was either included in your BA or is otherwise accessible for our consideration and reference. Fish and Wildlife Biologists of our office have been in contact with your consultants to discuss various aspects of the BA.

The BA has provided:  
a description of the action being considered,  
a description of the specific area that may be affected by the action,  
a description of any listed species that may be affected by the action,  
a description of the manner in which the action may affect any listed species or critical habitat and an analysis of any cumulative effects,  
relevant reports, and other relevant studies or information available on the action.

We have assigned log number 1-2-98-F-01 to this consultation. Please refer to that number in future correspondence on this consultation.

Section 7 regulations allow the Service up to 90 days to conclude formal consultation with your agency and an additional 45 days to prepare our biological opinion (unless we mutually agree to an

extension). Therefore, we expect to provide you with our biological opinion on or before March 27, 1998.

As a reminder, the Endangered Species Act requires that after initiation of formal consultation, the Federal action agency make no irreversible or irretrievable commitment of resources that limits future options. This practice ensures agency actions do not preclude the formulation or implementation of reasonable and prudent alternatives that avoid jeopardizing the continued existence of endangered or threatened species or destroying or modifying their critical habitats.

If you have any questions or concerns about this consultation or the consultation process in general, please feel free to contact me or Interagency Program Lead, Ms. Margo Stahl at 808/541-3441.

Sincerely,

*Heather W. Rose*  
Heather W. Rose  
Field Supervisor  
Ecological Services

cc: Richard Hill, USFWS Region I  
Bert McCauley  
Reggie David



United States Depa

FISH AND WIL  
PACIFIC ISLA  
300 ALA MOANA BOULEVARD, ROOM 3108  
BOX 50088  
HONOLULU, HAWAII 96850  
PHONE: (808) 541-3441 FAX: (808) 541-3470

PostNet Fax No	7671	91.303.965903	P.01
From	Reggie DePa	808-329-7141	12/25
To	United States Depa	808-329-7141	12/25
Subject	Plant propagation, habitat protection, outplanting, and monitoring.		

In Reply Refer To: Saddle Rd. (jmb)

Reggie David  
Rena Productions Ltd.  
P.O. Box 1371  
Kapilua-Kona, Hawaii 96745

Letter to  
Reggie after  
their mtg 12.4  
Brooks said etc  
12/31/87  
Not Rec'd @ FWH  
6:44E  
7/25

Dear Reggie:

As we discussed at our December 4, 1997, meeting, we are herewith transmitting our proposal to mitigate impacts to endangered plants and wetland habitats on the eastern side of the Saddle Road alignment (Sections III and IV). Mitigation for the endangered *Silene hawaiiensis* in Section II of the alignment was adequately detailed in our comments on the draft Environmental Impact Statement (DEIS).

Endangered Plant Mitigation

As discussed in the DEIS comments, indirect impacts of increased traffic on the improved Saddle Road can be expected to substantially increase the risk that the *Cyanea platyphylla* and *Clermontia peleana* near the road will be extirpated. Loss of these critically rare plants would sharply reduce the species' ranges as well as reduce their overall genetic diversity. These species are at such critically low numbers that a single human-related event that caused mortality of one of these plants could lead to the species' extinction. This conclusion underlies the Service's position on finding critical habitat designation to be not prudent for these species.

Both of these plants represent a local population that is a relict of a formerly widespread distribution, and as such are likely to be important components of the species' gene pool. *Cyanea platyphylla* is an endangered species that is currently only known from two populations, totaling less than 10 individuals. *Clermontia peleana*, though formerly known from Hawaii and Maui, is currently restricted to two populations totaling less than 10 individuals on the island of Hawaii. Conservation of these taxa should attempt to maintain and expand these populations in native habitat at or near their present location in order to maintain the species' distribution and genetic diversity. These plants are at risk due to both their low numbers and proximity to human populations in protected habitat, while reducing the risk of human-caused disturbance should be an important but secondary goal.

The mitigation actions should consist of 4 parts: Plant propagation, habitat protection, outplanting, and monitoring.

Plant propagation:

*Clermontia peleana* is currently being propagated at Volcano Mid-Elevation Plant Facility, the University of Hawaii's Lyon Arboretum, and National Tropical Botanical Garden. *Cyanea platyphylla* is currently being propagated at Volcano Mid-Elevation Plant Facility and National Tropical Botanical Garden. These institutions should be contacted regarding the availability and cost of propagules for outplanting. Cuttings or material from tissue culture from the Saddle Road area should also be collected, if it is not already available from these institutions, in addition to any material from other populations. Funding for collection, propagation, and maintenance of plants in *ex situ* cultivation must be included in the mitigation package.

Habitat protection: This has three components: Parcel identification and acquisition, initial protection, and long-term management.

Acquisition of private land for mitigation, either in fee or by establishment of conservation easements in perpetuity, is the preferred option. The *kipuka* harboring the *Cyanea platyphylla* is on private land, is accessible, and is suitable for outplanting this species as well as *Clermontia peleana*. It is approximately 113 hectares in size on land owned by the Hawaii Conference of the United Church of Christ (TMK 2-5-01-4 and 1)(see attached map). Because hunting on private land can be controlled or prohibited, public objection to fencing can be avoided. This *kipuka* should be the preferred mitigation target site.

Use of State Forest Reserve lands is problematic given the Hawaii Department of Land and Natural Resources' (DLNR) staffing levels, resistance by hunters to perceived restrictions on use, and other factors. However, State lands near the alignment that are remote from roads and not visited by hunters could be considered as mitigation sites. The major difficulty would be the need for helicopter access for fence construction, maintenance, monitoring, etc.

A third option is use of Federal lands (Hawaii Volcanoes National Park (HIAVO) and Hakalau National Wildlife Refuge (NWR)) for outplanting. These lands have several disadvantages: 1) Hakalau is near the northern limit of former range and may not be suitable for the genotypes found on Saddle Road, 2) Loss of at-risk plants will reduce species range, and thus increase vulnerability to stochastic events, if other individuals aren't outplanted in the saddle area, 3) suitable areas have not been identified in either the Park or the Refuge, and 4) potential areas at Hakalau are makai of existing fences, are remote, and have hunter constituencies. As with State lands remote from the road, access to sites at Hakalau would probably be expensive.

If the private *kīpuka* is not available, surveys should be conducted as soon as possible to locate public lands suitable for both species. These surveys should include botanists familiar with the species' habitats and representatives of the land management agencies.

Initial protection would require ungulate-proof fencing, removal of ungulates, control of invasive weeds, rat control, and slug control.

Like any fenced natural area in Hawaii, the mitigation site would have long-term management needs, which include fence maintenance and periodic replacement, maintenance of ungulate-free status via hunting and/or snaring, weed eradication, and control of animal pests (rats, slugs, etc.). In addition, monitoring for human and animal disturbance and the success of the management actions would be necessary. Funds and personnel would have to be available for these tasks in perpetuity.

If the private *kīpuka* were to be acquired, management might be enhanced by having the area become a cultural preserve under the supervision of a local group such as a *hālau hula*. Plantings of culturally significant plants would disturb only a small area and would create a constituency for protection of the site.

- Outplanting:

Outplanting of the two species should take place in areas of the mitigation site remote from human intrusion to reduce risk. If the private *kīpuka* is the site, only the small area near the road (containing the *Cyanea platyphylla*) appears to be visited casually, so most of the *kīpuka* is suitable for outplanting. Target population sizes for the two species should be on the order of 100 reproducing plants each.

- Monitoring:

All outplanted and wild plants should be monitored for survivorship, reproductive success, and the long-term persistence of the populations. Monitoring forms can be provided and data managed by the Center for Plant Conservation as part of their efforts to monitor critically endangered Hawaiian plants. If the wild individuals of either species set fruit in the future, additional materials should be collected and outplanted into the protected area. In addition, monitoring is vital to determine the success of the management actions or to determine if additional management actions are required.

As suggested in our DEIS comment letter, a mitigation fund held in trust for management use would allow long-term management and monitoring to be pursued. Fencing and initial habitat protection would entail considerable cost, but yearly maintenance costs after the initial phase should not be excessive.

Wetlands Mitigation

The wetlands mitigation points outlined in our DEIS comment letter should be qualified, in light of the opportunity presented by the privately owned *kīpuka* referred to above. This site contains a diverse native forest, a perennial stream, and many wetland inclusions. Although it is predominantly a koa-'ohi'a forested upland, and therefore does not represent most of the wetland types affected by the road, its quality and degree of threat (via pigs, weeds and humans) make it a high priority site for conservation. Inclusion of some of the surrounding 1855 lava flow within a protective fence would protect 'ohi'a scrub habitat and increase the diversity and area of wetlands protected by this option. If the site is available for conservation, the Fish and Wildlife Service's wetland mitigation and endangered species mitigation proposals should be combined to focus on protection and management of this area as adequate mitigation for both impacts.

If this area cannot be acquired or there is a problem combining the two mitigation proposals, then the four bullet items in our DEIS comment letter stand, with the potential inclusion of private landowners in discussions of land acquisition. This would be more in concert with the policy of the Environmental Protection Agency (EPA) for bringing wetlands under public protection in mitigation actions. No other preferred sites have been identified at this time.

As discussed at our December 4 meeting, rather than rewriting the Biological Assessment for the project, you will make the changes we discussed at the December 4 meeting and include mitigation for the *Clermontia puleana* and *Cyanea platyphylla* and wetlands in a letter to our office. These changes will need to be provided to us as soon as possible in order to meet the Federal Highway Administration's desired date for completion of the biological opinion and EIS for the project. If you have any questions or comments about the above proposed mitigation plan, please contact biologist Jeff Burgett or Assistant Field Supervisor Karen Rosa of my staff (phone: 808/541-3441; fax: 808/541-3470).

Sincerely,

*Brooks Harper*

Brooks Harper  
Field Supervisor  
Ecological Services

Attachment

#### 1.4.5 Chronological Correspondence and Notices, 1998

Correspondence From:	Correspondence To:	Date
County of Hawaii	United States Department of the Interior	2-10-98
United States Senate	United States Department of the Interior	3-6-98
United States Senate	Stephen Yamashiro	3-9-98
USFWS	FHWA	3-19-98
HDOT	FHWA	3-31-98
Dolan, Silva, & Associates, Cpas, Inc.	FHWA	4-4-98
FHWA	USFWS	4-7-98
Keri L. Morita	HDOT	4-9-98
Keri L. Morita	Senator Daniel Inouye	4-9-98
HDOT	Keri L. Morita	4-24-98
FHWA	DLNR	4-29-98
FHWA	Distribution list	4-29-98
FHWA	Abraham Y. Wong	4-29-98
FHWA	EPA	4-29-98
FHWA	USFWS	4-29-98
FHWA	HDOT	4-29-98
FHWA	Distribution list	5-20-98
FHWA	General Alexis T. Lum	5-20-98
Okahara & Associates, Inc.	HDOT	5-21-98
DLNR	FHWA	4-3-97
County of Hawaii	USDOT	5-27-98
DOA	Federal Lands Highway Program	6-10-98

HDOT	FHWA	7-1-98
DLNR	FHWA	6-15-98
PHRI	DLNR	8-18-98
PHRI	File	8-28-98
USFWS	FHWA	7-17-98
FHWA	Distribution List	6-18-98
United States Department of the Interior	Stephen K. Yamashiro	7-29-98
DOA	FHWA	7-21-98
USFWS	FHWA	7-27-98
USGS	FHWA	8-7-97
EPA	FHWA	8-12-98
FHWA	EPA	8-14-98
EPA	FHWA	8-31-98
FHWA	EPA	9-1-98
FHWA	DLNR	9-17-98
Roehrig, Roehrig, Wilson, & Hara	FHWA	8-14-98
FHWA	EPA	9-22-98
FHWA	Hawaii State Department of Business, Economic Development, and Tourism	10-5-98
EcoPlan Associates, Inc.	DLNR	4-1-98
FHWA	EPA	10-26-98
FHWA	Distribution List	11-30-98
FHWA	OHA	12-9-98
EPA	FHWA	12-16-98
DOFAW (Buck)	DOFAW (Conry)	12-18-98

DOA	FHWA	12-22-98
OHA	FHWA	12-22-98
Department of Business, Economic Development, & Tourism	FHWA	12-23-98
USFWS	FHWA	12-23-98
DOFAW	Division of Land Management	12-28-98
FHWA	Distribution list	12-29-98
USGS	FHWA	12-30-98

RECEIVED AS FOLLOWS

03/11/98 18:27 FAX 1 808 329 1006 OKAHARA-KONA  
03/11/98 08:52 FAX 1 808 329 1006 OKAHARA & ASSOC. \*\*\* O/A \*\*\*  
MAR 11 '98 06:53

03/11/98 18:27 FAX 1 808 329 1006 OKAHARA-KONA  
03/11/98 08:52 FAX 1 808 329 1006 OKAHARA & ASSOC. \*\*\* O/A \*\*\*  
MAR 11 '98 06:53

UNITED STATES SENATE  
SUITE 722, HART BUILDING OFFICE BUILDING  
WASHINGTON, DC 20540-1102  
(202) 224-2624  
FAX (202) 224-6747

UNITED STATES SENATE  
SUITE 722, HART BUILDING OFFICE BUILDING  
WASHINGTON, DC 20540-1102  
(202) 224-2624  
FAX (202) 224-6747

APPROPRIATIONS  
SUBCOMMITTEE ON INDIAN  
COOPERATION, AND TRADE/COMMERCE  
ADMINISTRATION IN INDIAN AFFAIRS  
AND RELATED MATTERS  
COMMITTEE ON INDIAN AFFAIRS  
REORGANIZING STRATEGIC COMMITTEE  
COMMITTEE ON INDIAN AND ALASKA  
NATIVE COMMISSION ON INDIAN

William G. Davis  
Managing Director  
Henry Cho  
Deputy Managing Director



County of Hawaii  
23 August Street, Room 223 • Hilo, Hawaii 96720-2233 • (808) 941-2111 • Fax (808) 941-4583  
HONOLULU 71-5701 Honolulu Highway, Suite 109 • Kalaheo, Hawaii 96750  
(808) 335-3226 • Fax (808) 335-2843

The Honorable Bruce Babbitt  
Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

February 10, 1998  
Mr. Dan Barry  
Acting Assistance Secretary for  
Fish and Wildlife and Parks  
United States Department of the Interior  
1849-C Street, North West  
Washington, D.C. 20240

Dear Mr. Secretary:  
I am writing to share with you copies of correspondence from the Mayor of the County of Hawaii, Stephen Yamashiro, and Acting Assistant Secretary Dan Barry regarding improvements to Saddle Road and the rationale behind the substantial mitigation being pursued by the U.S. Fish and Wildlife in conjunction with this project.

Dear Mr. Barry:  
Thank you for responding to my September 26, 1997, letter to Secretary Babbitt regarding the planned improvement of Saddle Road in the County of Hawaii.

As Mayor Yamashiro correctly states, this Saddle Road project is very important. The present road is extremely dangerous, and has had much more than its share of fatalities. The improvements will provide the U.S. Military with safer and better access to and within its training area, referred to as the Pohakuloa Training Area. It also will connect the east and west portions of the island and will provide access to Mauna Kea, some of the world's greatest collection of telescopes. Like Mayor Yamashiro, I am a strong proponent of these improvements.

While I can certainly understand your concern about protecting the critical habitat of the endangered palila, I question the logic, benefit and need to exchange 100 acres of land currently designated as critical habitat for 10,000 acres and an added cost to the project and taxpayers of \$15 million to \$20 million in operating funds. This proposed exchange is for an easement over a palila bird habitat where no birds have been found. The current so-called habitat has already been heavily impacted by extensive use by the military as an artillery firing point and maneuver area.

As you will note from the Mayor's most recent letter, he is frustrated by the lack of responsiveness to his specific questions relating to the degree of mitigation demanded for a marginal area that no endangered birds have inhabited in recent times. Mayor Yamashiro has requested my assistance in securing a response to his questions. He is convinced that the degree of harm to the habitat area is far less than the magnitude of the mitigation which is being demanded.

Many of our citizens are seriously questioning the need to replace this 100 acres with 10,000 acres that will be subject to the strict regulations and restrictions of a Endangered Species Act critical habitat.

In an effort to be responsive to Mayor Yamashiro, I would appreciate your review of this matter. In fact, I would appreciate your thoughts on the following:  
In light of Mayor Yamashiro's concerns, would the Fish and Wildlife Service (FWS) be willing, in the spirit of partnership, to invest its own funds for this extensive Palila bird restoration and revegetation program which seems to be more of a Department of Interior mission than a Federal Highway Administration/Department of Defense mission.

Thank you for carefully reviewing this matter.  
Sincerely  
Stephen X. Yamashiro  
Mayor

RECEIVED AS FOLLOWS

03/11/98 18:27 FAX 1 808 329 1008 OKAHARA-KONA  
03/11/98 08:53 808 861 8829 OKAHARA & ASSOC. --- O/A KONFR 11 '98 06:31PM P.4  
MFR 10 '98 06:27PM

03/11/98 18:27 FAX 1 808 329 1008 OKAHARA-KONA  
03/11/98 08:53 808 861 8829 OKAHARA & ASSOC. --- O/A KONFR 11 '98 06:31PM P.2  
MFR 10 '98 06:27PM

The Honorable Bruce Rabbitt  
March 6, 1998  
Page - 2 -

APPROPRIATIONS  
Subcommittee on Defense  
COMMERCE, SCIENCE AND TRANSPORTATION  
Subcommittee on Surface Transportation  
and Hazardous Materials  
COMMITTEE ON BUDGETARY AFFAIRS  
SUBCOMMITTEE ON INVESTMENT  
COMMITTEE ON BUDGETARY AFFAIRS  
COMMITTEE ON BUDGETARY AFFAIRS  
COMMITTEE ON BUDGETARY AFFAIRS

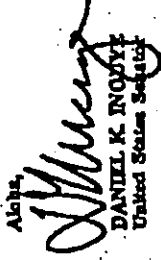
United States Senate  
SUITE 712, HART SENATE OFFICE BUILDING  
WASHINGTON, DC 20540-1102  
PH: (202) 224-3888  
FAX: (202) 224-6747

OFFICE HOURS: 9:00 AM - 5:00 PM  
MONDAY - FRIDAY  
EXCEPT FOR HOLIDAYS  
FAX: (202) 224-3888  
FAX: (202) 224-6747

In this regard, I am not referring to those mitigation requirements that have a nexus to the road improvement. These would clearly remain a part of the Saddle Road project. Rather, I am referring to the 10-year operational restoration budget, the lease of 10,000 acres to develop a critical habitat area, and the EIS, all of which would be overseen by the FWS office in Hawaii.

It would seem unnecessary to create an environmental crisis and battlefield over a road improvement project that is supported by the County of Hawaii communities, especially if the FWS would like to make the Falls bird a priority initiative within the Service. I look forward to learning of your thoughts on this matter, as well as receiving a response to Mayor Yamashiro's specific concerns.

I would appreciate hearing from you at your earliest convenience as the appropriations process begins shortly. Thank you for your attention to this matter.

Aloha,  
  
DANIEL K. INOUE  
United States Senator

DKI:jd  
Enclosure  
bcc: Pat Zell  
Mark Fox  
Jennifer Sabas  
Alex Lam

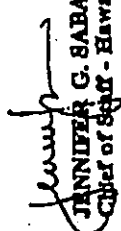
The Honorable Stephen Yamashiro  
Mayor  
County of Hawaii  
25 Anapuni Street, Room 215  
Hilo, Hawaii 96720

March 9, 1998

Dear Mr. Mayor:

Pursuant to your comments, attached is a copy of a letter that Senator Inouye sent to U.S. Department of Interior Secretary Bruce Babbitt regarding the U.S. Fish and Wildlife mitigation requirements for Saddle Road. I am sure that you will enjoy it, as it also sets forth a part of our strategy.

Please be assured that we will share with you any new information we receive, and will keep you updated on any further developments in this regard. Until then, best wishes.

Aloha,  
  
JENNIFER G. SABAS  
Chief of Staff - Hawaii

JGS:sd  
Enclosure  
bcc: Mr. Bill Kinoshita  
Mr. Wayne Iwasaka  
Ms. Paula Helfrich  
Mr. Mel Hewitt  
Mr. Reggie Okamura

03/11/98 06:56 TX/RX NO.1230 P.004

03/11/98 06:56 TX/RX NO.1230 P.002





United States Department of the Interior

FISH AND WILDLIFE SERVICE  
PACIFIC ISLANDS ECOREGION  
300 ALA MOANA BOULEVARD, ROOM 3108  
BOX 50088  
HONOLULU, HAWAII 96850  
PHONE: (808) 541-3441  
FAX: (808) 541-3470

MAR 19 1998

In reply refer to: JMC/MSS

Bert McCauley, P.E.  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Lakewood, CO 80228

Subject: Saddle Road: Inclusion of new project features discussed at 3/18/98 meeting into draft Biological Opinion project description

Dear Mr. McCauley:

Based upon our March 18, 1998 meeting with yourself, and representatives from your office, the Hawaii Department of Transportation (HDOT), Okahara and Associates, and Rana Productions, we understand that the Saddle Road realignment project description will be modified to include the following features. It is our understanding that you will provide our office with a more detailed written description of these features at your earliest convenience so that we may include these in our evaluation of the project and subsequent issuance of the biological opinion.

Specific project description modifications to avoid impacts to *Clazmonia palama* ssp. *palama*:

The Federal Highways Administration will construct vehicle-proof metal gates with tamper-proof locking mechanisms at both ends of the power line access road segment located between miles 13.4 and 14.4. Please identify who will be responsible for maintenance of locks and gates (State or County), which parties will be authorized access to the area, and the responsible party to ensure access is allowed only to authorized users.

Specific project description modifications to avoid impacts to *Cyanea plapphylla*:

- 1) Signage that will discourage vehicle pull off along this section of the road.
- 2) A visible fence that will block pedestrian access to the area of concern.
- 3) Roadbed shoulder design that will create an embankment that will effectively discourage user emigration from roadway.
- 4) Police enforcement

The Service wishes to be involved in discussions with your agency and the State of Hawaii Department of Land and Natural Resources to plan locations of vehicle pull offs along the entire project length.

Thank you for the opportunity to meet with you and to clarify these issues further. The Service still anticipates providing you with our draft biological opinion by April 17, 1998.

Sincerely,  
  
Brooks Harper  
Field Supervisor  
Ecological Services

cc: Reginald David, Rana Productions, Inc.  
Nancy Burns, Okahara & Associates

REPUBLIK L. CAUTERANO  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097  
MARCH 31 1998

KAZUHASHIMA  
DIRECTOR  
DEPUTY DIRECTOR  
GENERAL COUNSEL  
GENERAL COUNSEL

REPLY REFER TO:  
HWY-1A  
2.8639

March 31, 1998

Mr. Bert McCauley  
Federal Highways Administration  
555 Zang Street  
Denver, Colorado

**Re: Saddle Road Realignment  
Draft Environmental Impact Statement**

Dear Mr. McCauley:

Many of us residents of Kaunama have attended community meeting to learn of the different alternative routes that the Saddle Road EIS has considered. We know that it is down to two choices - EX-4 (Kaunama realignment) or E-3 (Bypass route).

The current alignment of Kaunama Drive is poor and its realignment with the proposed EX4-A will prevent future accidents, around Kaunama City (mile 7-8) but at what cost, I ask? Currently, this road is getting more noisy with much more traffic and 4Xs the amount of litter, in the last two years. In addition, there are one dozen homes which are located along-side the road on a steep hill which further intensifies the noise as trucks labor to climb this hill. Yes, this alternative would only serve as a temporary band-aid, until the full impact of this through-way becomes reality to a quiet district, especially during military training maneuvers. The alternate bypass route of E-3 would take this noise, traffic and litter away from this residential area, plus serve as an alternate route in case of road blockage, ie. Lava flow or accidents.

I do not understand the concern over wetlands in the area when, in fact, there should be more concern over drainage. Kaunama gets an average of 150-180 inches of rain, annually, which falls on these old lava fields with sudden flooding conditions, promoted by underground water through the lava tubes. The comparison of alternative roads speaks of "prime farmland" on E-3 and I would like to find this deep soil? It is not safe pastureland, unless the hills and valleys (or holes) of lava are leveled with soil imported. There is plenty of undeveloped space around this residential area which would be much better suited to a major through-way across the island, like E-3 and the proposed Punaluu Extension into the industrial district of Hilo. I have lived in Kaunama for 11 years and choose a lot which was the furthest away from busy roadways but the old timers who have lived here all their lives alongside the road, have no other alternative.

It would be better for all of us if this road was built on the E-3 alignment because it would help the entire district, while Kaunama City residence need to resolve their realignment issues when the current road becomes a County maintained side road.

Sincerely,

*Mary M. Uyeda*  
Mary M. Uyeda, RN, Plus (unanimous) consent  
Kaunama City Association  
Carol C. Arueta  
A. Lynn Berger  
Keith Repman  
Burt Beuthner  
54 ea  
Manuel A. Santos  
John R. Santos

Mr. Larry C. Smith, Division Engineer  
Federal Highway Administration  
U. S. Department of Transportation  
555 Zang Street  
Denver, Colorado 80228

Dear Mr. Smith:

Subject: Inclusion of New Project Features Discussed at 03/18/98 Meeting  
into Draft Biological Opinion Project Description, Saddle Road,  
Project No. A-AD-6(1)

This letter is in response to the U. S. Fish and Wildlife Service's (USFWS) March 19, 1998 letter requesting a more detailed written description of the Saddle Road realignment project to incorporate roadway design features to mitigate potential secondary impacts to *Clermenia pelcaena* ssp. *pelcaena* and *Cyanea platyphylla*.

*Clermenia pelcaena* is located more than 200 meters north of the roadway right-of-way in the vicinity of milepost 14. To avoid potential secondary impacts from our roadway improvements, we propose the following:

1. We will require the grantee of the existing power pole easement to construct and maintain vehicle-proof gates with tamper resistant locking mechanism at locations where the power pole easement intersects the proposed Saddle Road alignment between milepost 13.4 and 14.4. The gates shall be constructed along the roadway right-of-way.
2. Access to the power pole easement shall be limited to the grantee of the easement and owners and lessees of the subject property.
3. The State shall hold users of the easement access gates responsible for ensuring access is allowed only to authorized users.

Mr. Larry C. Smith  
Page 2  
MAR 31 1998

HVY-PA 2.8639

Cyanea platyphylla is located more than 250 meters south of the proposed right-of-way in the vicinity of milepost 10.5. Specific project description modifications to avoid potential secondary impacts to Cyanea platyphylla are as follows:

1. Signage including "Emergency Stopping Only" and/or "No Parking" signs will be installed along this section of the roadway.
2. A visible fence will be installed along the right-of-way to block pedestrian access to the area of concern.
3. Wherever practical, the roadway cut and fill embankments will be designed to discourage user emigration from the roadway. This will be accomplished by steepening excavation and embankment slopes where soil conditions allow and using guardrail where indicated by current highway standards.

The above design modifications constitute the proposed mitigation for the existing Cyanea platyphylla and Clermentia peleana plants. It is our understanding that the above mitigation will not be required in the event that either species is down listed or extirpated.

The project proponents will coordinate with the USFWS when locating vehicle pull offs along the entire length of the project.

Thank you for your assistance in coordinating mitigation measures for the Saddle Road project.

Very truly yours,



KAZU HAYASHIDA  
Director of Transportation

**DOLAN, SILVA & ASSOCIATES, CPAs, INC.**  
AN ACCOUNTANCY CORPORATION

16A Railroad Avenue  
Hilo, Hawaii 96720  
(808) 935-5433; Fax (808) 935-5434

544 Ohohia Street, Suite 5  
Honolulu, Hawaii 96819  
(808) 839-5544; Fax (808) 839-5506

April 4, 1998

Mr. Bert McCauley  
Federal Highways Administration  
555 Zang Street  
Denver, Colo. 80225

Re: Saddle Road Realignment Proposals

Dear Mr. McCauley:

I am writing to you as I was given your name as the person who is making the decision regarding the Saddle Road realignment. I live in the Kaunama City subdivision next to the current highway and just above the proposed saddle road realignment alternative EX-4 or 4A (EX-4). My family and I have lived in Kaunama City for over ten years. The maps we have received regarding this are poor at best and do not specifically spell out your plans, but it appears that you are routing all the traffic literally into my backyard with alternative EX-4. Therefore, I am writing to urge you and any one else who is deciding on this to consider alternative EX-3 or at the very least a modification of EX-4. How would you like having large trucks driving through your backyard at all hours of the day and night?

As I understand it, this plan (EX-4) eliminates the two dangerous turns, one at the County Department of Water Supply's water tank at the bottom of the hill below us, and one further down the hill, a quarter mile or so. This is good, but it is only a halfway measure. This plan does not take into consideration the severe change in elevation and the small "S" curves that occur in the road just above where EX-4 appears to rejoin the old road. Your map makes this look almost like a straight line, but believe me it is not. Over the years, my neighbors and I have helped with numerous small accidents from people who slide off the road between the "8" mile marker just above the subdivision, down to the county's water tank.

It appears to me that your surveyors just shot their marks and nobody bothered to talk to the residents next to the road about the current road and all of its problems and how we would solve the problems. Instead, EX-4 as it is currently planned will create a large number of new problems for us, and users of the road. EX-4 would add new traffic road hazards, such as the water runoff that flows from our houses across the current road. This water comes from our very ample

rainfall of over 200 inches a year. (A few years ago we had over 300 inches in Kaunama City.) We currently have some heavy truck traffic and military convoys that past us and all of them have to gear way down (with lots of noise) to come up the hill just above the county water tank. Going down the hill they have to gear down to prevent running off the road on the little "S" curves by us and sliding off the road at the hairpin curve at the water tank. This traffic is projected to increase three or fourfold as the roads are improved. I believe this will exacerbate the current road problems and will make this area much more dangerous than it currently is. I do not believe that you want that.

I really believe that your EX-3 alternative will give you more room to build the road right instead of having to deal with the existing road problems that will come with your EX-4 proposal. By the way, there is NO "prime farmland" in the EX-3 corridor. The author of that portion of the EMS must have picked up a soil map of the Hamakua coast, as he or she is sadly mistaken. If this issue wasn't so serious, it would be funny. If you have already decided against EX-3, at least consider changing your EX-4 proposal to veer away from Kaunama City above the "8" mile marker (above the subdivision) toward the EX-3 proposal, and then come back to your EX-4 proposal just below the subdivision you would make a lot of people happy.

I also believe that with change in EX-4 you will find that change in elevation can be handled in a much more gradual manner and water runoff problems from existing houses would not occur. This would prevent hydroplaning and runaway trucks that may occur in your current plan. I know my neighbors and I would support a change to EX-4 if it were 400 - 500 yards or more towards EX-3 and away from us, if you decide to not choose EX-3, which we all believe is the better way to go. My neighbors that live inside of Kaunama City are also opposed to EX-4 and you should be receiving their letter if you have not already.

I am very supportive of the efforts being made to improve our roads and make them safer as are my neighbors. Although you are not a politician, I have asked my neighbors to sign below showing their support for what I have written and I have urged them to write to express their opinions also. Thank you and Aloha.

Sincerely yours,



William Ronald Dolan, CPA

cc: U.S. Senator Daniel K. Inouye  
U.S. Senator Daniel K. Akaka  
U.S. Representative Patsy T. Mink  
U.S. Representative Neil Abercrombie  
Mayor Stephen Yamashiro  
Councilwoman B.J. Leithhead-Todd

We, the residents living in Kaunama City near the highway are **ABSOLUTELY**  
**OPPOSED** to the EX-4 alternative to the Saddle Road realignment.

*Ron Dolan*  
*Patti Umeda*  
*Ken Umeda*  
*Gladys Mochizuki*  
*Tomoko Mochizuki*  
*Kiley Umeda*  
*JCA M*  
*John J. ...*  
*Richard ...*  
*Leah Wagner*  
*Lisa K. Milldrum*  
*Breana P. Milldrum*  
*Rene A. Das*  
*Brandi Bidan*  
*Dan ...*  
*HEAVENS ...*  
*...*  
*Marian ...*  
*...*  
*...*  
*Danielle ...*  
*...*  
*...*  
*...*  
*...*  
*Cherise Kawachi*  
*...*

We, the residents living in Kaumana City near the highway are **ABSOLUTELY**  
**OPPOSED** to the EX-4 alternative to the Saddle Road realignment.

*Jean Verne*  
*Alverson Verne*  
*Darjela Verne*  
*John A. Verne*  
*Amagon & Otero*  
*John E. Powell*  
*Alverson Verne*  
*Prince D. Verne*  
*John A. Verne*  
*William S. Verne*



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

APR 7 1998  
In Reply Refer To:  
Saddle Road, A-AD-6(1)

Mr. Brooks Harper, Field Supervisor  
U.S. Fish and Wildlife Service  
Pacific Islands EcoRegion  
300 Ala Moana Blvd., Room 3108  
Honolulu, HI 968501

Dear Mr. Harper:

Subject: 1-2-98-F-01 Section 7 Consultation

This letter clarifies points raised over the Biological Assessment (BA) submitted November 12, 1997 for the proposed Saddle Road project, A-AD-6(1), in a meeting held at your office on December 4, as well as several issues that have been raised since then. Your December 29 letter stated that all of the information required of us was provided in the BA so we were not aware that you were expecting additional information. We hope that the following meets your needs.

1. In the section entitled "Overview of Potential Biological Impacts" on page 10 of the BA we state: "The two principal indirect impacts of this proposed project are the increased likelihood of wildfires in the saddle area, and the increase in the access and potential colonization of biologically important areas by alien mammalian predators, introduced land snails, insects, other arthropods, noxious weeds, and other undesirable plant species." The question has been raised as to why we did not further elucidate the issue of mammalian predators and more specifically why we have not proposed project wide mitigation to offset the potential impacts of same.

First, the issue of alien mammalian predators on the Island of Hawaii is bigger than the scope of this project, the EIS, BA or current USFWS policy. Mammalian predators, especially cats, mongooses, and dogs, are so ubiquitous on the Island of Hawaii that realistic control is totally impossible. Furthermore, until public policies and social mores change to the point that controlling or eliminating cats and dogs is politically acceptable on an Island ecosystem level, little can be done to reduce the potential spread of these predators. Any impacts occurring due to these introduced mammalian predators is not a result of the construction of this roadway, but rather a result of the number of pets that residents have and how they control them. However, we have proposed predator control within the approximately 10,000 acres that is proposed to be set aside for the regeneration of mamane forest and ultimately the expansion and/or re-establishment of Palia.

2

2. The Service has expressed concern that the construction of the proposed roadway will result in much higher traffic speeds on the road, which in turn may pose an increased threat to the Nene found within the saddle area. It is unlikely that the improved roadway will result in significantly higher traffic speeds. One radar study conducted by the DOD police found that the current average speed of vehicles traveling through PTA over a one week period was 58 miles/hour. Secondly, it has been estimated by the Department of Land and Natural Resource personnel that there are, at a maximum, 16 Nene within the saddle area. No Nene fatalities have ever been recorded along the roadway. If anything, the straightening and widening of the roadway should reduce the likelihood of vehicular interaction with Nene due to the increased sight distances and increased paved roadway and shoulder widths on which to maneuver so as to avoid collision with birds. Additionally, the increased width of the roadway and attendant shoulders will further separate vehicular traffic from any potential grazing by Nene along the road edges.

3. On pages 34-35 of the BA we address the issue of unplanned wildfire threats. We stated: "The risk of an unplanned wildfire damaging the regenerating mamane forests in the three Palia mitigation areas as well as the existing habitat adjacent to the proposed roadway is a real one. In an effort to develop the most effective fire management regimes to be implemented on the three Palia mitigation sites and to best plan for the avoidance of, and, in a worst case scenario, the control of an unplanned conflagration, it is imperative that a real world fire model, or models, be developed for the lands in question. To that end it is proposed that: A fire ecologist with experience in modeling high altitude xeric plant communities, such as high desert chaparral should be retained to create a fire model(s) consistent with the best known methodology. The fire ecologist should work closely with local vegetation ecologists familiar with Hawaiian ecosystems in order to maximize the effectiveness of the plans generated. The training that local vegetation ecologists will gain in high elevation xeric plant communities fire modeling techniques will enhance resident vegetation ecologists' ability to provide effective guidance as conditions change over time. This will ensure that there will be continuity in fire management on Mauna Kea, even after the initial mitigation funds have been expended. Following the fire modeling exercise, a comprehensive fire management plan complete with risk assessment protocols and guidelines should be drafted so as to be consistent with Palia habitat recovery goals."

When drafting the above proposed mitigation we did not specifically address the mixed Hard-stemmed Lovegrass Grassland and the 'Awecoewo shrubland found on the alluvial flats along the western end of Section II and the eastern end of Section I. Any fire modeling and resulting fire management plans shall include these habitats which contain a high proportion of native plant species.

4. During our discussions with the Service, concern was raised that we had not addressed the population of Federally threatened *Silene hawaiiensis* currently found north of deadman's curve along the existing roadway. This is currently the largest known colony of this endemic species. Concerns were voiced that if the PTA-1 segment is constructed, the existing roadway through this area will no longer be open to civilian traffic resulting in a reduced traffic volume on this roadway. It was argued that the continued relatively heavy traffic utilizing the existing roadway acts as a deterrent to feral ungulates crossing from their principal population centers within the Redleg and impact areas south of the roadway into this *Silene hawaiiensis* population and that relocation of the roadway away from this area would cause a deleterious effect from these ungulates on this species.

3

We disagree with the Service's argument that locating the proposed roadway over one mile away from this species population will result in an impact from feral ungulates to this population. Any impact to this population is more properly considered under the ongoing Section 7 consultation with the U.S. Army Garrison-Hawaii. The FHWA has initiated a dialog with the Army concerning this population with the goal of having the Army assume responsibility for protecting this population as part of their ongoing environmental resource management program initiated under their Section 7 consultation for the facility.

5. Concerns have been voiced by the Service over what the Hawaii Department of Transportation (HDOT) will be willing to commit to regarding alien plant control following their assumption of the maintenance jurisdiction of the roadway after construction. The HDOT is willing to comply with the protocols proposed on page 37 of the BA in which we proposed the following: "The potential spread of fountain grass into disturbed areas along either PTA-1 or PTA-3 shall be mitigated by inspecting the right-of-way every four months during the course of construction and manually spraying any emerging fountain grass with a suitable herbicide, such as Roundup  $\text{O}$ . Following the completion of construction the roadway will fall under the maintenance jurisdiction of the HDOT; they will maintain the roadway and will use mowing, and when necessary, herbicides to control roadside weed and grass growth."

6. Two endangered plant species, *Cyanea platyphylla* and *Clermontia pelcaea* are mentioned on page 46 of the BA. The *Clermontia pelcaea* is located 237 meters north of the proposed right-of-way which is immediately adjacent to an existing HELCO power line easement. It was felt that since this plant is located well outside of the proposed roadway which in turn will not be constructed any closer to this plant than the existing road, this project will not have a deleterious impact on this species. Furthermore, it suggested that the most immediate threat to this plant is posed by HELCO utility service activities along their power line roadway. During discussions with the Service over this particular plant, some confusion emerged as to the exact distance between the plant and the closest point of the proposed roadway. In the BA it was stated that the plant is located approximately 175 meters north of the existing centerline. Now that we have more detailed engineering drawings, the actual distance is corrected with the plant being even further away from the right-of-way than originally reported.

The *Cyanea platyphylla* which is located more than 250 meters south of the existing roadway is the sole remaining individual of a larger population that has recently been heavily impacted by pigs. The FHWA did not propose mitigation in the BA for this species since it was felt that, as with the *Clermontia*, this project will not deleteriously impact this plant. Following the meeting held at the USFWS office in Honolulu on March 12, 1998, a letter has been delivered to the Service outlining reasonable mitigation that is acceptable to the Hawaii DOT for the minimal probability of potential secondary impacts to these plants from wandering, sight-seeing pedestrians.

7. In an effort to reduce the further spread of noxious weeds, alien plants, insects, etc., by the users of the proposed roadway, it was suggested by the FHWA that informational signs be placed in proximity to historical markers and other planned road signs, pullouts, or parking areas, explaining the diversity and importance of the native habitats found within the saddle area, the importance of not introducing alien species into the environment, and fire dangers and effects. It was also suggested that the judicious use of guardrail/fence and the

placement of pullouts and parking areas would be coordinated with the Service since their location could have a significant impact in steering motorists and sightseers away from biologically sensitive areas. Any pullouts, parking areas, kiosks, trail systems, or other features included in the project for the sole purpose of biological information dissemination could not be considered a reasonable expenditure of public funds for this project.

This is our understanding of the conclusion to items under discussion at the above referenced meeting. We trust that this letter will allow your office to complete the BA by April 17 as agreed on February 25 between yourself and Bert McCauley of this office.

Any further correspondence regarding the BA, BO, or points raised in this letter, should be addressed to either myself or Mr. Bert McCauley, Staff Environmental Engineer.

Sincerely yours,

*Larry C. Smith*

Larry C. Smith, P.E.  
Division Engineer

- cc: Mr. Kenneth Au, Advance Planning Engineer, Hawaii DOT, 600 Kapiolani Boulevard, No. 301, Honolulu, HI 96813
- Col. Barry Totten, Director, DPW, Wheeler Army Airfield, Bldg. 104, U.S. Army Garrison-Hawaii (APVG-GW), Schofield Barracks, HI 96857-5013
- Maj. Gen. Alexis Lum, Executive Assistant, Senator Daniel K. Inouye, Federal Building, 300 Ala Moana Blvd, Room 7325, Honolulu, HI 96850
- Mr. Abe Wong, Division Engineer, FHWA, Federal Building, 300 Ala Moana Blvd., Room 3202, Honolulu, HI 96850
- Mr. Donald Okahara, Principal, Okahara & Associates, 200 Kohola Street, Hilo, HI 96720

RECEIVED  
STATE DEPARTMENT  
OF TRANSPORTATION  
APR 20 1 42 AM '98

09 April 1998  
Governor Ben Cayetano,  
Highways Division  
1415 Kalia Road  
Honolulu, HI 96813

I would like to express my concern over an apparent article addressing the realignment of Saddle Road on the Big Island. Apparently the project may be in jeopardy for a variety of reasons. I would like to take a couple minutes of your time to share my views with you.

I recently lost my husband at the early age of 33. His name was Daison M. Morita and he was a Lieutenant with the State Airports Rescue Fire Fighting Unit at Keahole International Airport. This was a man who lived to help other people, he started his fire career at the Pohakuloa Training Area on the Big Island. On the morning of March 2, 1998 would change many lives forever, this was the day that a beloved husband, father, son and brother left for work at 5:30 am. His journey took him over Saddle Road and he never made it to Kona, instead he left this earth due to a two car accident which claimed his life.

Working at the Pohakuloa Fire Department for many years, he had to respond to MANY car accidents which claimed some lives. This was something that was very hard for him to handle, but knew it was part of his job.

I am going to ask you just for a few minutes to consider the fact that this road is used by many of our residents to travel from one side to the other on a daily bases due to our jobs, many families use this road to travel as well. Let us not forget that we also have a military facility up there, which helps support our sagging economy, that also takes a number of people on this road. Improving Saddle Road seems to have been an issue for many years, however this is the farthest I have seen it come. I will ask you to please insure that "we" (the State) take the responsibility to fix a hazardous road that has jeopardized many of "our" lives as well as visitors from afar.

It is too late for my family but my husband lived to help others, and in his death he is again continuing to teach us that "life is too short....be sure we enjoy everyday as if it were going to be our last."

With that I ask you to please insure that the State takes on its responsibility which has been neglected for years, to fix this road that it be safe for anyone who needs to travel on it.

Thank you for your time and may God Bless and keep you safe.

Sincerely,

*Keri L. Morita*  
Keri L. Morita

To Check:  PLUS CONTACTS ARE \_\_\_\_\_

FOR \_\_\_\_\_

Check and/or recommendations prepared

Appropriate description

Check ready for/next Quarterly

Year Information/Date

Check ready for Governor's signature

Follow up/Report

Submit copy of responses to end

Keep in file

Return envelope

DATE: \_\_\_\_\_

BY: \_\_\_\_\_

RECEIVED  
APR 17 10 27 AM '98  
DEPT. OF TRANSPORTATION  
HAWAIIAN DIVISION

APR 16 3 47 PM '98  
DIRECTOR'S OFFICE  
DEPT. OF TRANSPORTATION

APR 16 1998  
STATE DEPARTMENT OF TRANSPORTATION

MAY-11-98 MON 11:41 AM HWY-PLANNING BRANCH FAX NO. 8085871787 P. 2

DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION  
MAY 6 8 12 AM '98

09 April 1998  
Senator Daniel Inouye,  
93 APR 15 11:51:12

I would like to express my concern over the recent article addressing the realignment of Saddle Road on the Big Island. Apparently the project may be in jeopardy for a variety of reasons. I would like to take a couple minutes of your time to share my views with you.  
I recently lost my husband at the early age of 33. His name was Daison M. Morita and he was a Lieutenant with the State Airports Rescue Fire Fighting Unit at Keahole International Airport. This was a man who lived to help other people, he started his fire career at the Pohakuloa Training Area on the Big Island. On the morning of March 2, 1998 would change many lives forever, this was the day that a beloved husband, father, son and brother left for work at 5:30 am. His journey took him over Saddle Road and he never made it to Kona, instead he left this earth due to a two car accident which claimed his life.

Working at the Pohakuloa Fire Department for many years, he had to respond to MANY car accidents which claimed some lives. This was something that was very hard for him to handle, but knew it was part of his job.  
I am going to ask you just for a few minutes to consider the fact that this road is used by many of our residents to travel from one side to the other on a daily bases due to our jobs, many families use this road to travel as well. Let us not forget that we also have a military facility up there, which helps support our sagging economy, that also takes a number of people on this road. Improving Saddle road seems to have been an issue for many years, however this is the farthest I have seen it come. I will ask you to please insure that "we" (the State) take the responsibility to fix a hazardous road that has jeopardized many of "our" lives as well as visitors from afar.  
It is too late for my family but my husband lived to help others, and in his death he is again continuing to teach us that "life is too short....be sure we enjoy everyday as if it were going to be our last."  
With that I ask you to please insure that the State takes on its responsibility which has been neglected for years, to fix this road that it be safe for anyone who needs to travel on it.  
Thank you for your time and may God Bless and keep you safe.

Sincerely,  
Keri L. Morita

RECEIVED  
STATE DEPARTMENT  
OF TRANSPORTATION  
MAY 7 11 20 AM '98  
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1 8 55 AM '98  
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DEPT. OF TRANSPORTATION  
HIGHWAYS DIVISION

GOVERNOR'S REFERRAL 98:0416422  
April 24, 1998

Ms. Keri L. Morita  
44 Hoomana Street  
Hilo, Hawaii 96720

Dear Ms. Morita:

Please accept my condolences on the loss of your husband on the Saddle Road.

The needed improvements to the Saddle Road are being jointly sponsored by the Federal Highway Administration, the Department of the Army, the County of Hawaii and the State of Hawaii. Senator Daniel K. Inouye has also recognized the importance of improving Saddle Road and has shown his support by approaching Congress for design and construction funds.

Public Hearings were held in December 1997 in Kona and Hilo and the necessary environmental documents are expected to be approved this year. Should funds become available, construction through the Pohakuloa Training Area could begin shortly thereafter. The other sections of Saddle Road would be improved as more funds become available.

One of my priorities is to make all of our highways safer for the people of Hawaii. With support such as yours, we will attain this goal.

With warm personal regards,

Aloha,  
*Benjamin J. Cayetano*  
BENJAMIN J. CAYETANO

KYA:gm  
cc: Kazu Hayashida  
HWY-PA





U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

APR 29 1996

In Reply Refer To:  
HPD-16E/Saddle Road

Mr. Michael D. Wilson  
State Historic Preservation Officer  
Department of Land and Natural Resources  
State Historic Preservation Division  
33 South King Street, 6th Floor  
Honolulu, HI 96813

Dear Mr. Wilson:

In accordance with your letter of December 22, 1997 requesting submittal of a revised archaeological inventory survey report on the proposed Saddle Road Project, we are submitting under separate cover, the final report entitled *Archaeological Inventory Survey and Historic and Traditional Cultural Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project*. This report was originally submitted by letter of April 10, 1997 wherein we requested concurrence with our eligibility determinations. Subsequently, by letter of July 31, 1997, we received review comments on this report from the State Historic Preservation Office (SHPO), including eligibility determinations which differed from those in our report.

On September 23, 1997, we transmitted a response to your comments agreeing with the SHPO's eligibility determinations and requesting initiation of discussions regarding effect determinations and proposed mitigation. In this letter, we indicated that the social assessment prepared by Ed and Pua Kanahale had no further Traditional Cultural Properties (TCP) implications. On October 28, 1997, we met with Mr. Don Hibbard, Deputy State Historic Preservation Officer, regarding the Kanahale report; SHPO staff was not present for a discussion of eligibility and effect issues. Mr. Hibbard subsequently wrote to us on November 14, 1997 wherein he stated that additional ethnographic studies would be required to examine, in a TCP context, two of several issues raised by the Kanahale report; i.e., mamane forests and Mauna Kea. We have since begun work on these studies and held a meeting in March of this year to discuss our findings with Mr. Hibbard and Mr. Gil Coloma-Agaran.

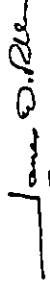
In a letter dated December 22, 1997, the SHPO commented on the Draft Environmental Impact Statement (DEIS) for this project, reserving comment on effects and mitigation until receipt of a revised inventory report. We had not submitted a revised report earlier because we did not know that a revised report was required before discussions on effects and mitigation could be initiated. On March 12, 1998, we met with Ms. Holly McEldowney of the SHPO to review the progress on the report revisions, discuss submittal time frames, and to receive guidance on the development of a Memorandum Of Agreement (MOA). At this meeting, it was agreed that we could submit

the revised report on archaeological and historic sites as soon as possible while continuing to work on the TCP studies, submitting these findings in a TCP Addendum report at a later date. We are concerned about meeting our schedule for completion of the Final EIS, which must contain the MOA; therefore, we are proceeding on this basis presently.

With the submittal of this revised report, we are again requesting the initiation of discussions on the eligibility of sites, effect determinations, and proposed mitigation as contained in our September 23, 1997 letter and the DEIS. Mr. Tom Wolforth of FHWA, Archaeological Consultants, has been working diligently with your staff, on our behalf, to effect agreeable revisions to the report; therefore, we believe the information contained in the revised report to be satisfactory for the SHPO's determinations and evaluations. In this respect, should we not receive a response from the SHPO within 30 days of the receipt of the revised report, we will assume implicit concurrence with our recommendations and complete the Section 106 process in consultation with the Advisory Council on Historic Preservation as directed by 36 CFR Part 800: Subpart A, Para. 800.1 (c)(1)(ii).

Should you have any questions regarding this submittal, please contact Mr. Bert McCauley, Staff Environmental Engineer, at (303) 716-2141.

Sincerely yours,

  
Larry C. Smith, P. E.  
Division Engineer

cc: Ms. Mary Ann Naber, Historic Preservation Specialist, Advisory Council on Historic Preservation, 1100 Pennsylvania Ave., NW, Suite 809, Washington, DC 20004  
Gen. Alexis Lum, Executive Assistant, Office of Senator Daniel K. Inouye, 300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850  
Mr. Abraham Wong, Division Administrator, FHWA, III Division, Prince Jonah Kūiho Kalanianaʻole Federal Bldg., 300 Ala Moana Blvd., Rm. 3202, Honolulu, HI 96850  
Mr. Tom Wolforth, Projects Manager, Paul H. Rosenthal, Inc., 204 Waiianuenue Avenue, Hilo, HI 96720  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Assoc., 73-5574 Maiau Street, Bay 6B, Kailua-Koua, HI 96740  
Mr. Merrill Deskins, Environmental Specialist, FHWA, Region 9, 201 Mission Street, Suite 2100, San Francisco, CA 94105



Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

APR 29 1998  
In Reply Refer To:  
HPD-16E/Saddle Road

cc (with enclosure):  
Ms. Lolly Silva, Environmental Engineer, USACE, Operations Branch, Ft. Shafter, HI  
Maj. Gen. Alexis Lum, Exec. Asst., Office of Senator Daniel K. Inouye, Honolulu, HI  
Mr. Merrill Deskins, Environmental Protection Spec., FIWA, Region 9, San Francisco, CA  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kailua-Kona, HI

Lt. Col. Ralph H. Graves  
District Engineer  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

Dear Colonel Graves:

In accordance with the "Memorandum of Understanding for the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (MOU), we are transmitting herewith a copy of the 404(b)(1) Analysis Report (report) for the proposed Saddle Road Project (SR 200) from Milepost 6 near Hilo, Hawaii to the Mamalahoa Highway (SR 190). This report was prepared at the request of the U.S. Army Corps of Engineers and the Environmental Protection Agency. It contains an analysis of alternatives in Sections III and IV of the proposed project. The report is intended to serve two purposes: 1) address the Clean Water Act Section 404(b)(1) requirements for discharge of fill material in special aquatic sites (wetlands); and, 2) address the requirements of the MOU with respect to the FINAL EIS DEVELOPMENT stage of coordination identified in the Appendix A "concurrent process" guidelines of the MOU (Page 2 of 6).

The analysis of alternatives contained in the report presents our conclusions on selection of the Least Environmentally Damaging Practicable Alternative (LEDPA) in Sections III and IV as required by the MOU. The INTRODUCTION section of the report contains seven bulleted requests for decisions by the signatory agencies to the MOU. We are asking for your review of the enclosed report and a written response to the requests contained therein within 45 days of your receipt of this letter as provided for in the MOU.

We are available to meet with you to address any aspects of the report or findings that require clarification. If you have any questions or need further information, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 716-2141.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosure

Distributions: 404(b)(1) Analysis Report

NEPA/404 MOU Staff Level Working Panel

Mr. Kenneth Au, Advance Planning Engineer, Hawaii DOT, Honolulu, HI  
Ms. Lolly Silva, Environmental Engineer, USACE, Operations Branch, Ft. Shafter, HI  
Mr. Don Palawski, Asst. Field Supervisor, USFWS, Pacific Is. EcoRegion, Honolulu, HI  
Mr. Dave Carlson, Environmental Protection Agency, Region IX, San Francisco, CA  
Ms. Wendy Wiltsie, Environmental Protection Agency, PO Box 50003, Honolulu, HI 96850  
Mr. Glenn Yasui, Senior Transportation Engineer, FHWA, HI Division  
Mr. Bert McCauley, Environmental Project Manager, FHWA, CFLHD, Lakewood, CO  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kailua-Kona, HI

NEPA/404 MOU Second Level Dispute Resolution Panel

Mr. Kenneth Y. K. Au  
Advance Planning Engineer  
Hawaii DOT, Highways Division  
600 Kapiolani Boulevard, No. 301  
Honolulu, HI 96813

Lt. Col. Ralph H. Graves  
District Engineer  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, HI 96858-5440

Mr. Brooks Harper, Field Supervisor  
U.S. Fish & Wildlife Service  
Pacific Islands EcoRegion  
300 Ala Moana Blvd., Room 3108  
Honolulu, HI 96850

Mr. Alexis Strauss, Director  
Water Division  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Mr. Abraham Y. Wong  
Division Administrator (HAD-HI)  
Federal Highway Administration  
Box 50206  
Honolulu, HI 96850



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

APR 29 1998

In Reply Refer To:  
HFD-16E/Saddle Road

Mr. Abraham Y. Wong  
Division Administrator (HAD-HI)  
Federal Highway Administration  
Box 50206  
Honolulu, HI 96850

Dear Mr. Wong:

In accordance with the "Memorandum of Understanding for the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (MOU), we are transmitting herewith a copy of the 404(b)(1) Analysis Report (report) for the proposed Saddle Road Project (SR 200) from Milepost 6 near Hilo, Hawaii to the Mamalaohu Highway (SR 190). This report was prepared at the request of the U.S. Army Corps of Engineers and the Environmental Protection Agency. It contains an analysis of alternatives in Sections III and IV of the proposed project. The report is intended to serve two purposes: 1) address the Clean Water Act Section 404(b)(1) requirements for discharge of fill material in special aquatic sites (wetlands), and, 2) address the requirements of the MOU with respect to the FINAL EIS DEVELOPMENT stage of coordination identified in the Appendix A "concurrent process" guidelines of the MOU (Page 2 of 6).

The analysis of alternatives contained in the report presents our conclusions on selection of the Least Environmentally Damaging Practicable Alternative (LEDPA) in Sections III and IV as required by the MOU. The INTRODUCTION section of the report contains seven bulleted requests for decisions by the signatory agencies to the MOU. We are asking for your review of the enclosed report and a written response to the requests contained therein within 45 days of your receipt of this letter as provided for in the MOU.

We are available to meet with you to address any aspects of the report or findings that require clarification. If you have any questions or need further information, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 716-2141.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosure

cc (with enclosure):

- Mr. Glenn Yasui, Senior Transportation Engineer, FHWA, III Division
- Maj. Gen. Alexis Lum, Exec. Asst., Office of Senator Daniel K. Inouye, Honolulu, HI
- Mr. Merrill Deakins, Environmental Protection Spec., FHWA, Region 9, San Francisco, CA
- Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kailua-Kona, HI



Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80275-0246

APR 29 1998

In Reply Refer To:  
IFPD-16E/Saddle Road

Mr. Alexis Strauss, Director  
Water Division  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Mr. Strauss:

In accordance with the "Memorandum of Understanding for the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (MOU), we are transmitting herewith a copy of the 404(b)(1) Analysis Report (report) for the proposed Saddle Road Project (SR 200) from Milepost 6 near Hilo, Hawaii to the Mamalahoa Highway (SR 190). This report was prepared at the request of the U.S. Army Corps of Engineers and the Environmental Protection Agency. It contains an analysis of alternatives in Sections III and IV of the proposed project. The report is intended to serve two purposes: 1) address the Clean Water Act Section 404(b)(1) requirements for discharge of fill material in special aquatic sites (wetlands); and, 2) address the requirements of the MOU with respect to the FINAL EIS DEVELOPMENT stage of coordination identified in the Appendix A "concurrent process" guidelines of the MOU (Page 2 of 6).

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Sincerely yours,

*Larry C. Smith*  
Larry C. Smith, P.E.  
Division Engineer

Enclosure

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

cc (with enclosure):

Mr. Dave Carlson, Environmental Protection Agency, Region IX, San Francisco, CA  
Ms. Wendy Wiltsie, Environmental Protection Agency, PO Box 50003, Honolulu, HI 96850  
Ms. Gen. Alexis Lum, Exec. Asst., Office of Senator Daniel K. Inouye, Honolulu, HI  
Mr. Merrill Deskins, Environmental Protection Spec., FHWA, Region 9, San Francisco, CA  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kailua-Kona, HI



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 23246  
Denver, Colorado 80225-0246

APR 29 1998

In Reply Refer To:  
HPD-16E/Saddle Road

Mr. Brooks Harper, Field Supervisor  
U.S. Fish & Wildlife Service  
Pacific Islands EcoRegion  
300 Ala Moana Blvd., Room 3108  
Honolulu, HI 96850

Dear Mr. Harper:

In accordance with the "Memorandum of Understanding for the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (MOU), we are transmitting herewith a copy of the 404(b)(1) Analysis Report (report) for the proposed Saddle Road Project (SR 200) from Milepost 6 near Hilo, Hawaii to the Mamalahoa Highway (SR 190). This report was prepared at the request of the U.S. Army Corps of Engineers and the Environmental Protection Agency. It contains an analysis of alternatives in Sections III and IV of the proposed project. The report is intended to serve two purposes: 1) address the Clean Water Act Section 404(b)(1) requirements for discharge of fill material in special aquatic sites (wetlands); and, 2) address the requirements of the MOU with respect to the FINAL EIS DEVELOPMENT stage of coordination identified in the Appendix A "concurrent process" guidelines of the MOU (Page 2 of 6).

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We are available to meet with you to address any aspects of the report or findings that require clarification. If you have any questions or need further information, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 716-2141.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosure

cc (with enclosure):

- Mr. Don Palawski, Asst. Field Supervisor, USFWS, Pacific Is. EcoRegion, Honolulu, HI
- Maj. Gen. Alexis Lum, Exec. Asst., Office of Senator Daniel K. Inouye, Honolulu, HI
- Mr. Merrill Deskins, Environmental Protection Spec., FHWA, Region 9, San Francisco, CA
- Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kailua-Kona, HI



Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

APR 29 1998

In Reply Refer To:  
HPD-16E/Saddle Road

Mr. Kenneth Y. K. Au  
Advance Planning Engineer  
Hawaii DOT, Highways Division  
600 Kapiolani Boulevard, No. 301  
Honolulu, HI 96813

Dear Mr. Au:

In accordance with the "Memorandum of Understanding for the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (MOU), we are transmitting herewith a copy of the 404(b)(1) Analysis Report (report) for the proposed Saddle Road Project (SR 200) from Milepost 6 near Hilo, Hawaii to the Mamoahoa Highway (SR 190). This report was prepared at the request of the U.S. Army Corps of Engineers and the Environmental Protection Agency. It contains an analysis of alternatives in Sections III and IV of the proposed project. The report is intended to serve two purposes: 1) address the Clean Water Act Section 404(b)(1) requirements for discharge of fill material in special aquatic sites (wetlands); and, 2) address the requirements of the MOU with respect to the FINAL EIS DEVELOPMENT stage of coordination identified in the Appendix A "concurrent process" guidelines of the MOU (Page 2 of 6).

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We are available to meet with you to address any aspects of the report or findings that require clarification. If you have any questions or need further information, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 716-2141.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosure

cc (with enclosure):

Maj. Gen. Alexis Lum, Exec. Asst., Office of Senator Daniel K. Inouye, Honolulu, HI  
Mr. Merrill Detkins, Environmental Protection Spec., FHWA, Region 9, San Francisco, CA  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kailua-Kona, HI

2



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80725-0246

MAY 20 1998  
In Reply Refer To:  
HPD16E/Saddle Road

Mr. Peter M. Cline  
Senior Engineer  
Military Traffic Management Command  
720 Thimble Shoals Boulevard, Suite 130  
Newport News, VA 23606-2574

Dear Mr. Cline:

We are planning a full-day Partnering Session for Tuesday, June 30, at the Turtle Bay Hilton Resort, 57-091 Kamehameha Highway, Kahuku, Hawaii, to resolve outstanding issues relating to the *Pali'a* mitigation requirements for the PTA-1 alignment on the Saddle Road Project. The mitigation requirements for this alignment were disclosed by the U.S. Fish and Wildlife Service (USFWS) in their Draft Biological Opinion (BO) delivered on April 17. These mitigation requirements closely follow those proposed in our Biological Assessment (BA) and were jointly developed over the last two years by the USFWS and the Federal Highway Administration (FHWA) with significant input from other participating agencies. The Partnering Session will be led by a professional facilitator, Mr. Peter Adler, of The Accord Group, and will focus on resolving principle issues to some level of comfort, as determined by key decision-makers of participating agencies.

As indicated on the enclosed agenda, it is hoped that the session results in a signed agreement which clarifies replacement land requirements, agency roles and responsibilities, and funding levels which will guarantee implementation of the mitigation requirements. It is also intended that this Partnering Agreement will guide staff level personnel in the preparation of more specific, implementation oriented intersession agreements at a later date. In order for the agreement to be consummated at the Partnering Session, we are requesting that agency representatives with delegated authority to make commitments on behalf of their agency be in attendance for the entire session.

If agreement on mitigation implementation responsibilities and funding cannot be reached at this meeting or shortly thereafter, consideration must be given to pursuing a modified PTA-1 alignment that does not take Pali'a Critical Habitat. In this event, the project will be delayed substantially, perhaps as much as one year, to update the Environmental Impact Statement and hold public information meetings. Further, this modified alignment will not warrant the comprehensive mitigation that the PTA-1 alignment does, nor will it fully meet the Army's quality of training improvement needs, a major purpose of the proposed project.

Accordingly, we are requesting your participation in this partnering event for the entire day. For space management considerations, we are anticipating that yourself and one or two staff level personnel will be attending, as indicated on the enclosed "Participant List". Please advise us if you will require additional support staff so we can make appropriate arrangements.

We are currently scheduling interview meetings later this month with the key participants, in order to frame issues from the participating agencies' perspective, as a starting point for discussions. These meetings will allow us to compile a proposed agreement format with refined issue statements around which the discussion can center. We will transmit this agreement outline to you, as well as an outline of the mitigation requirements contained in the BO, for your use in planning for the discussions, about one or two weeks prior to the partnering meeting.

We look forward to your participation in this precedent setting event. I am available by phone at (303) 716-2003 to discuss any details of the session with you at your convenience, or you may call Mr. Bert McCauley, Environmental Project Manager at (303) 716-2141 with any questions regarding session planning.

Sincerely yours,

LS/

Larry C. Smith, P.E.  
Division Engineer

Enclosures:

Partnering Session Agenda, Participant List

cc (w/enclosures):

Maj. Gen. Alexis T. Lum, Executive Assistant, Office of Senator Daniel K. Inouye, Federal Building, 300 Ala Moana Blvd., Room 7325, Honolulu, HI 96850  
Mr. Abraham Y. Wong, Division Administrator, FHWA HI Division, Federal Building, 300 Ala Moana Blvd., Room 3202, Box 50206, Honolulu, HI 96850  
Mr. Donald Okahara, Principle, Okahara & Associates, 200 Kohola Street, Hilo, HI 96720

Same Letter Sent to:

Mr. Wayne Hamaguchi, Chief  
Planning Branch  
U.S. Army Pacific Command, Hawaii  
Attn: APEN-IF  
Building 104  
Fort Shafter, HI 96858-5100

Col. Barry N. Totten, Director  
Dept. of Public Works  
U.S. Army Garrison-Hawaii  
Building 300  
Schofield Barracks, HI 96857-5000

LTC David Hergengrader, Commander  
HQ, PTA, USAG-HI  
Bldg T-180  
Milepost 36, H200 (Saddle Road)  
Hilo, HI 96720

Mr. Robert Smith, Manager  
U.S. Fish & Wildlife Service  
Pacific Islands Office  
300 Ala Moana Blvd., Room 3108  
Honolulu, HI 96850  
cc: Mr. Brooks Harper, Field Supervisor

Mr. Kazu Hayashida, Director  
Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813-5097  
cc: Mr. Kenneth Au, Advance Planning  
Engineer

Mr. Michael Wilson, Director  
Department of Land & Natural Resources  
P.O. Box 621  
Honolulu, HI 96809  
cc: Mr. Gil Coloma-Agaran, Deputy Director  
Mr. Mike Buck, Administrator, DOFAW

Mr. Sam Callejo  
Chief of Staff  
Office of the Governor  
State of Hawaii  
State Capitol  
Honolulu, HI 96813

Dr. William Steiner, Director  
USGS Biological Research Division  
Pacific Islands Ecosystem Research Center  
Hawaii Field Station  
P.O. Box 44  
Hawaii National Park, HI 96718  
cc: Mr. Paul Banko

Honorable Stephen Yamashiro  
Mayor, County of Hawaii  
25 Aupuni Street, Room 215  
Hilo, HI 96720

cc (w/enclosures):  
J. Keeley  
D. Gedeon  
R. Cushing  
B. McCauley  
cc: reading file  
Central file - HI A-AD-6(1), Saddle Road  
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**Paliia Mitigation Partnering Session**

June 30, 1998  
Turtle Bay Hilton  
Kahala Ballroom  
8:00 A.M.

8:00	Start Up	30 Minutes
▶	Welcome.....	Senator Daniel K. Inouye
▶	Meeting Purpose and Introductions.....	Larry Smith
▶	Meeting Goals, Agenda, Ground Rules.....	FHWA Division Engineer Peter Adler
		Hawaii Justice Foundation
8:30	Building Partnerships: Opportunities, Dilemmas, Synergies	45 Minutes
▶	Simulation Problem.....	Peter Adler
▶	Applications to Saddle Road	
9:15	Briefing	45 Minutes
▶	Section 7 Consultation History.....	Bert McCauley
▶	Mitigation Plan Summary.....	Environmental Project Mgr. Reginald David
▶	Scientific Basis for Mitigation Plan.....	RANA Productions Paul Banko
		USGS Biological Resources Div.
10:30	Break	
10:45	Discussion	75 Minutes
▶	Questions, Clarification, Comments.....	Peter Adler
▶	Mitigation Certainties, Uncertainties, Agreements, Disagreements	
▶	Continuing Information Needs	
▶	Key Themes and Issues	
12:00	Lunch	90 Minutes
1:30	Lessons Learned from Great Partnerships	15 Minutes
▶	Apollo 13.....	Peter Adler
▶	Organizing Genius by Bennis & Bierdeman	
1:45	Discussion (Continued)	Until Closing
▶	Resolution of Core Questions.....	Peter Adler
▶	Resolution of Options	
▶	Development of Contingent Agreement in Principle	
5:30	Pau	

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**Participant List**

**Paliia Mitigation Partnering Session**

June 30, 1998  
Turtle Bay Hilton  
Kahala Ballroom  
8:00 A.M.

Organization	Participants
Senator's Office	GEN Alexis Lum
Senator's Office	Jennifer Goto-Sabas
Governor's Office	Sam Callejo
County of Hawaii	Hon. Stephen Yamashiro
US Army, DPW	COL Bary Totten
US Army, PTA	LTC David Hergenroeder
US Army, USARPAC	Wayne Hamaguchi
Military Traffic Mgmt Command	Peter Cline
HI Dept. of Land & Nat. Resources	Mike Wilson
DLNR, Land Division	Gil Coloma-Agaran
DLNR, Div. Forestry & Wildlife	Mike Duck
US Fish & Wildlife Service	Robert Smith
USFWS	Brooks Harper
Hawaii DOT	Kazu Hayashida
HDOT	Kenneth Au
USGS/Biological Resources Div.	Bill Steiner
USGS/BRD	Paul Banko
Okahara & Associates, Inc.	Donald Okahara
O & A	Reggie David
FHWA, Central Fed. Lands Div.	Larry Smith
FHWA, Honolulu Division	Glenn Yasui
FHWA, CFLHD	Bert McCauley

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US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zeng Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

MAY 20 1998  
In Reply Refer To:  
HPD16E/Saddle Road

Maj. Gen. Alexis T. Lum  
Executive Assistant  
Office of Senator Daniel K. Inouye  
Federal Building  
300 Ala Moana Blvd., Room 7325  
Honolulu, HI 96850

Dear General Lum:

We are planning a full-day Partnering Session for Tuesday, June 30, at the Turtle Bay Hilton Resort, 57-091 Kamehameha Highway, Kahuku, Hawaii to resolve outstanding issues relating to the Palila mitigation requirements for the PTA-1 alignment on the Saddle Road Project. The mitigation requirements for this alignment were disclosed by the U.S. Fish and Wildlife Service (USFWS) in their Draft Biological Opinion delivered on April 17. These mitigation requirements closely follow those proposed in our Biological Assessment (BA) and were jointly developed over the last two years by the USFWS and the Federal Highway Administration (FHWA) with significant input from other participating agencies. The Partnering Session will be led by a professional facilitator, Mr. Peter Adler of The Accord Group, and focus on resolving issues to some level of comfort by key decision-makers of participating agencies.

As indicated on the enclosed agenda, it is hoped that the session results in a signed agreement which clarifies replacement land requirements, agency roles and responsibilities, and funding levels which will guarantee implementation of the mitigation requirements. It is also intended that this Partnering Agreement will guide staff level personnel in the preparation of more specific, implementation oriented interagency agreements at a later date. In order for the agreement to be consummated at the Partnering Session, we are requesting that agency representatives with delegated authority to make commitments on behalf of their agency be in attendance for the entire session.

If agreement on the implementation responsibilities and funding cannot be reached at this meeting or shortly thereafter, consideration must be given to pursuing a modified PTA-1 alignment that does not take Palila Critical Habitat. In this event, the project will be delayed substantially, perhaps as much as one year, to update the Environmental Impact Statement and hold public information meetings. Further, this modified alignment will not warrant the comprehensive mitigation that the PTA-1 alignment does, nor will it fully meet the Army's quality of training improvement needs, a major purpose of the proposed project.

Accordingly, we are requesting your participation in this partnering event for the entire day. We are enclosing a "Participants List" should Senator Inouye wish to personally discuss the project with key individuals prior to the session, or suggest additional participants. As you will note on the enclosed agenda, we are anticipating that Senator Inouye will open the meeting, either personally or by video, pursuant to your suggestion at the March 17, SEB Team meeting.

We are currently scheduling interview meetings later this month with the key participants, in order to frame issues from the participating agencies' perspective, as a starting point for discussions. These meetings will allow us to compile a proposed agreement format with refined issue statements around which the discussion can center. We will transmit this agreement outline to you, for your use in planning for the discussions, about one or two weeks prior to the partnering meeting.

We look forward to your participation in this important meeting. I am available by phone at (303) 716-2003 to discuss any details of the session with you at your convenience, or you may call Mr. Bert McCauley, Environmental Project Manager at (303) 716-2141 with any questions regarding session planning.

Sincerely yours,

/s/

Larry C. Smith, P.E.  
Division Engineer

Enclosures:

Partnering Session Agenda, Participant List

cc (w/enclosures):

Ms. Jennifer Goto-Sabas, Esq., Chief of Staff-Hawaii, Office of Senator Daniel K. Inouye,  
300 Ala Moana Blvd., Room 3108, Honolulu, HI 96850

Mr. Abraham Y. Wong, Division Administrator, FHWA HI Division, Federal Building,  
300 Ala Moana Blvd., Room 3202, Box 50206 Honolulu, HI 96850

Mr. Donald Okahara, Principle, Okahara & Associates, 200 Kohola Street, Hilo, HI 96720

bc (w/enclosures):

J. Keeley

D. Gedeon

R. Cushing

B. McCauley

yc: reading file

Central file: HI A-AD-6(1), Saddle Road

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BMS

**Paliia Mitigation Partnering Session**

June 30, 1998  
Turtle Bay Hilton  
Kahala Ballroom  
8:00 A.M.

8:00	Start Up	30 Minutes
▶	Welcome.....	Senator Daniel K. Inouye
▶	Meeting Purpose and Introductions.....	Larry Smith FHWA Division Engineer
▶	Meeting Goals, Agendas, Ground Rules.....	Peter Adler Hawaii Justice Foundation
8:30	Building Partnerships: Opportunities, Dilemmas, Synergies	45 Minutes
▶	Simulation Problem.....	Peter Adler
▶	Applications to Saddle Road	
9:15	Briefing	45 Minutes
▶	Section 7 Consultation History.....	Bert McCauley Environmental Project Mgr.
▶	Mitigation Plan Summary.....	Reginald David RANA Productions
▶	Scientific Basis for Mitigation Plan.....	Paul Banko USGS Biological Resources Div.
10:30	Break	
10:45	Discussion	75 Minutes
▶	Questions, Clarification, Comments.....	Peter Adler
▶	Mitigation Certainties, Uncertainties, Agreements, Disagreements	
▶	Continuing Information Needs	
▶	Key Themes and Issues	
12:00	Lunch	90 Minutes
1:30	Lessons Learned from Great Partnerships	15 Minutes
▶	Apollo 13.....	Peter Adler
▶	Organizing <i>Genius</i> by Bennis & Biederman	
1:45	Discussion (Continued)	Until Closing
▶	Resolution of Core Questions.....	Peter Adler
▶	Resolution of Options	
▶	Development of Contingent Agreement in Principle	
5:30	Fau	

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**Participant List**

**Paliia Mitigation Partnering Session**

June 30, 1998  
Turtle Bay Hilton  
Kahala Ballroom  
8:00 A.M.

Organization	Participants
Senator's Office	GEN Alexis Lum
Senator's Office	Jennifer Goto-Sabas
Governor's Office	Sam Callejo
County of Hawaii	Hon. Stephen Yamashiro
US Army, DPW	COL Barry Totten
US Army, PTA	LTC David Hergenroeder
US Army, USARPAC	Wayne Hamaguchi
Military Traffic Mgmt Command	Peter Cline
HII Dept. of Land & Nat. Resources	Mike Wilson
DLNR, Land Division	Gil Coloma-Agaran
DLNR, Div. Forestry & Wildlife	Mike Buck
US Fish & Wildlife Service	Robert Smith
USFWS	Brooks Harper
Hawaii DOT	Kazu Hayashida
HDOT	Kenneth Au
USGS/Biological Resources Div.	Bill Steiner
USGS/BRD	Paul Banko
Okahara & Associates, Inc.	Donald Okahara
O & A	Reggie David
FHWA, Central Fed. Lands Div.	Larry Smith
FHWA, Honolulu Division	Glenn Yasui
FHWA, CFLHD	Bert McCauley



May 21, 1998  
Reference No. 97024  
Letter No. 47636

Anne M. Shiigi  
Rights-of-Way Agent  
Land Acquisition Section  
State of Hawaii  
Department of Transportation  
Highway Division, Rights-of-Way Branch  
888 Milliani Street, Suite 502  
Honolulu, Hawaii 96813

Dear Ms. Shiigi


Subject: Saddle Road Project

This is to follow up with respect to our meeting last month on the Saddle Road Project. In accordance with this meeting, please find attach the backup material regarding the prior contacts with the State Lessees in the Puu Mali and Ka'ohie Lease Lands.

I apologize for the delay in getting this material to you. I will be following up in setting up meetings with the impacted ranchers in the near future.

Please call me if you have any questions in the meantime.

Sincerely,

  
Willard L. Moore, Senior Planner

attachments:

cc: Gary Martin, DLNR Land Agent (w/ attachments)  
Nancy Burns, Okahara & Associates (w/ attachments)  
Bert McCauley, FHWA-Denver (w/ attachments)  
Glenn Yasui, FHWA-Honolulu (w/ attachments)

Donald K. O'Brien, P.E. • Maurice M. Mahala, P.E. • Lawrence M. Moku, P.E. • Glenn S. Sui, P.E. • Henry E. Burns, P.E.  
200 KAHALA, P.O. BOX 189720 • HONOLULU, HI 96818 • FAX (808) 941-6277 • E-MAIL: doobrien@okahara.com  
477 ALA MOANA DRIVE, SUITE 203 • HONOLULU, HI 96813 • FAX (808) 524-1224 • FAX (808) 521-3131 • E-MAIL: ooburn@okahara.com  
79-5574 MAUO STREET, 9th Fl. • KAILUA-KONA, HI 96740 • FAX (808) 329-1271 • FAX (808) 329-1006 • E-MAIL: ooburn@okahara.com

### Meeting Record

By: Bill Moore, Senior Planner  
Okahara & Associates, Inc.

Meeting with: Dean Uchida, Administrator, Division of Land Management, DLNR  
Mike Buck, Administrator, DOFAW, DLNR

Date: August 7, 1996

Bert McCauley and I met with Dean and Mike to brief them on the status of the Section 7 consultation process for the Saddle Road Project. I provided an overview of the project and the status of discussions with the USF&WS and NBS regarding the potential impact to Palila habitat and the need for the possible translocation of Palila to other sections of Mauna Kea as part of the mitigation program.

In discussing this matter, Dean requested that we provide written documentation of the meeting to ensure there is a paper trail of discussions with DLNR. He also wanted DLNR to be provided with a written justification why the State lands at Puu Mali are required and not other lands within the region. This justification should be strong enough to convince both the existing landowners and the Board of Land and Natural Resources that these are the best land for this purpose and that there are no other reasonable alternatives.

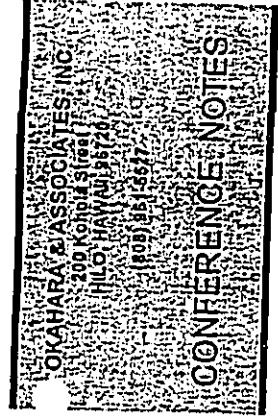
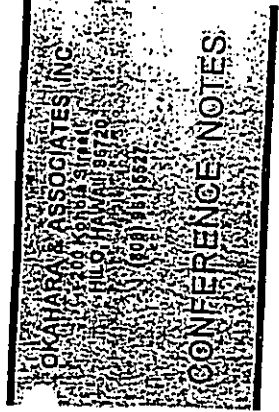
Mike Buck indicated that his Division has significant concerns about the long-term management of these lands once the relocation program funds run out. His office already has more lands than they can reasonably manage given current budget constraints. Accordingly, he does not want the responsibility to manage these lands without additional resources.

Mike felt strongly that NBS/USF&WS should not dictate to DLNR how the land should be managed or controlled. Once object criteria for the forest restoration is established, DLNR must have the flexibility to establish the management regime, including identification of compatible uses. In this regard, their preference is to work with existing lessees to cooperatively manage the mamane forest resource while providing for access for the palila translocation and monitoring. This in turn will keep the lands in productive use while allowing appropriate management of the forest resources.

Mike also wanted to make sure that the program was not foreclosing other options, including the possible relocation of palila to Haleakala.

**Job No.:**  
**Project:** Saddle Road  
**Subject:** Coordination with Chuck Langlas  
**Contractor:** FHWA  
**Meeting?** DLNR-Land Division  
**Telephone?** Yes  
**Place:** DLNR Office-Honolulu  
**Date:** 23 October 1996  
**Time:** @9:30 am  
**By:** William L. Moore  
 Sheet 1 of 1

**Job No.:**  
**Project:** Saddle Road  
**Subject:** Palila Critical Habitat-Section 7  
**Contractor:** FHWA  
**Meeting?**  
**Telephone?** Telephone Record  
**Place:**  
**Date:** 20 December 1996  
**Time:** 1:30 pm  
**By:** William L. Moore  
 Sheet 1 of 1



Attendees: Glenn Abo, Glenn Taguchi, Gary Martin

**ITEM DISCUSSION**

**ACTION REQUIRED**

1 I met with Glenn Abo to update him on the status of the discussions with USF&WS and NBS regarding the Palila Critical Habitat mitigation. I gave an advance copy of USF&WS' letter outlining the mitigation requirements. I also informed Glenn that the major addition to our previous discussions is that the Lau Ranch parcel is now being required as part of the mitigation program. Previously, USF&WS indicated that it would be nice to have but not a necessary part of the mitigation program.

Glenn informed me that he is leaving DLNR and transferring to another Department. Accordingly, he brought in Glenn Taguchi and Gary Martin to be updated on the program.

Upon review of the mitigation program, Glenn Taguchi indicated that the following would need to be addressed as part of any mitigation program:

1. Reimbursement of improvement costs less depreciation.
2. Remaining lessee interest in lease.
3. Reimbursement to State/DHA of lost revenues

The current lease rents for the areas are:

Lau Ranch	\$4,240 per year
KK Ranch	\$28,376 per year
SC Ranch	\$34,735 per year
Boleilho Ranch	\$33,595 per year.

Glenn also indicated that while the owners of KK and SC Ranch were involved for "lifestyle" reasons, Boleilho runs a dairy. The leased lands are an integral part of the operations. Consequently, an withdrawal of lands needs to consider the impacts on the overall operations.

I told Glenn and Gary that a meeting on this matter was being set up for late November. We wanted to be sure that everyone was aware and that there were no surprises. I also told them that we have been working with DCF&W on this matter and they may want to coordinate with them as well.

Attendees: Glenn Taguchi, DLNR

**ITEM DISCUSSION**

1 I spoke to Glenn Taguchi on the status of his contacts with the impacted rancher. Glenn indicated that he had spoken to either the lessees or their representatives as follows:

1. Carl Carlson, Parker Ranch Trustee - 885-7311  
Parker is generally open to the withdrawal. However, they want to discuss potential options to minimize impacts.
2. Ed Boleilho Jr., Boleilho Hawaii Enterprises, Inc. - 889-5782  
Glenn indicated that Ed Boleilho Sr. is very sick and Ed Jr. is taking over operations of the ranch. He indicated that Ed did not seem to have a major problem with the withdrawal of lands.
3. Jason Monk, D.V.M., KK Ranch - 974-6500 (State Department of Agriculture veterinarian)  
Glenn indicated that Jason may have a problem with the withdrawal of lands.

4. Keoki Woods, Manager, SC Ranch - 776-1616

Keoki is the ranch manager and lives on site. He will contact the owner, Dutch Schuman to let him know of the possible withdrawal of the State lease.

Glenn is going to be on vacation over the next two weeks. However, he agreed to get together with me during that period to discuss the procedural requirements and schedule for the withdrawal of the lands. (Glenn lives in Hilo, although his job is based in Honolulu.)



Accordingly, he felt it was extremely unfair that he is being impacted by the Saddle Road project.

He indicated that the lease provisions provide for "economic impact" of the withdrawal on his operations. He wanted to know what this meant. If the only compensation is for reimbursement of direct investments, he will fight the withdrawal.

In general, he feels that the State is not looking out for the ranchers interest; that they do not understand ranching and ranch lease requirements.

#### Follow-up

I told both Schuman and Moniz that representatives of both DLNR and FHWA will be following up with them to discuss specific concerns and procedures for the possible withdrawal of portions of the state leases. Both Schuman and Moniz would prefer to deal directly with Mike Wilson or Gil Coloma-Agaran on this matter rather than the Land Agents. They wanted someone there that can make a commitment, and not just a messenger.

I also told them that I would be following up with Ed Botelho of Botelho Enterprises on this matter. Furthermore, I assured them that we would not be playing one rancher off against another.

Schuman indicated that Kevin (?) Botelho worked for him. However, he is leaving to take over the ranching operations for the family. Their father, Ed Botelho Sr., is very sick. Consequently, Ed Jr. is taking over responsibility of Botelho Enterprises, while his brother will take over the ranch.

Job No.:  
Project: Saddle Road  
Subject: Palila Mitigation  
Contractor: FHWA  
Meeting?  
Telephone? Telephone record  
Place:  
Date: 21 January 1997  
Time: 1:30 pm  
By: William L. Moore  
Sheet 1 of 2



Attendees: Glenn Taguchi, DLNR Land Manager

#### DISCUSSION

Discussion with Glenn Taguchi  
21 January, 1997, 1:30 pm

Glenn returned may call regarding coordination with the Ranchers.

Glenn indicated that he had talked to Jason Moniz on a recent flight. Jason's concerns regarding the lease are as follows.

The upper 2,000 acres of his lease are good pasture land. He currently runs about 300 head of cattle there. If this area is removed, there is no way for him to amortize his fixed costs/initial investment to establish the ranch over the remaining 5,000 acres. Jason currently runs approximately 600 head on the remaining 3,000 acres.

Consequently, Jason is looking to recover his initial investment that he would not otherwise be able to amortize given the reduction in cash flow.

Glenn indicated that the other ranchers do not have the same problems. Botelho's land is very poor, although they may have some water improvements in the area proposed to be withdrawn.

I asked Glenn what the process would be to withdraw the land from the existing lessees. Glenn indicated that the key factor is the management of the lands once they are withdrawn. The actual withdrawal can be done by the Land Board. However, DLNR would also like to re-encumber the lands as part of the same action. Consequently, we need to identify how the land will be managed once it is withdrawn.

If the land are to managed by DLNR-DOFAW, the withdrawn area can be consolidated/resubdivided into the existing Forest Reserve lot. However, if the lands are to be managed by USE&WS or another party, a separate lot of record would have to be created. This would require compliance with the subdivision code and could require a Variance or other administrative permit from the Planning Department.

Note: Any subdivision establishing a new lot(s) must provide water and access to an improved government road. If these cannot be reasonably provided, a variance from these requirements must be secured. This process takes sixty to ninety days over and above the subdivision process.

The withdrawal action must also reserve easements for any waterline improvements that are in place.

Glenn will check on the potential issues related to the Office of Hawaiian Affairs' 20% share of lease rent. It may be possible to avoid this issue if the lands are retained by DLNR as part of the Forest Reserve. However, if the lands are controlled by a third party, then the OHA payment issue (as well as loss of State revenues) come to the forefront.

Possible solutions to the management of the lands include:

1. The lands go to DOWFAW for their management and control
2. The lands go to DOWFAW with a Memorandum of Understanding with USF&WS to manage the area for Palila habitat.
3. The lands go directly to USF&WS for management.
  - a. Lease payments may be prepaid at a discounted rate. However, this raises the question of what happens at the end of the lease which is around 2010.

Other points.

1. Easements may need to be created for waterlines and/or reservoirs in the withdrawn areas if portions of the water systems are in those lands. This may apply to access roads.
2. If withdrawal of the lands are for a public purpose (endangered species habitat), DLNR may be able to take immediate control of the area even if the compensation amount is not resolved. This could be done through the Courts.
3. Glenn was under the impression that the withdrawn lands would extend to Keenakolu Road in Botelho's property. I told Glenn that according to the 8 October 1996 letter from USF&WS, the habitat area would extend down to the 6,500 foot elevation. I faxed a map of the approximately withdrawal area to Glenn.

I requested a copy of the lease provisions from Glenn. If I don't get them in the next day or two, I will follow up with him on this.

FROM: Glenn Yasui  
TO: FURZIE, PHYLIS (WMC00000001)  
DATE: 2/23/97 12:13pm  
SUBJECT: HIS or HIS Assessment Info -Reply  
Alpha sent.

Yesterday, 2/4, we had a meeting with the ranchers involved in the State DLNR lease withdrawal for the Palila mitigation plan.

Attending were  
DLNR Dep. Director Gil Aguilar, Glenn Taguchi  
Bill Moore - Okahara & ASSOC.  
Kooki Woods - SE Ranch  
Jason Monis - KE Ranch  
Sobby Kipua - Yehar Ranch  
Ed Botelho, Jr., & his brother Wayne Botelho - Botelho Ranch  
Me

The briefing went well as far as explaining the need for road project was concerned. They all support the rebuilding of saddle road. However, Monis qualified that with deferred support pending assurances that he will be adequately compensated and that the overall loss of agricultural lands on the big island is minimized. Kooki Woods was strongly supportive - his ranch lands are least affected. Botelho is looking for replacement grazing lands. Some questions brought up included:

1. Is possible to implement a phased withdrawal based on a schedule of activities proposed by the FWS in establishing their recovery area?
2. How was the Puu Hei access determined by NRE/FWS? Is a scientific study available to support the take?
3. What kind of land management plan will be implemented? Who is the lead agency? Does FWS need a fee taking to establish the recovery area?
4. Is joint use possible to allow limited grazing for grasslands maintenance (fire prevention)? Would the ranchers be allowed to help in the management of the Mamane growth?
5. What happens if the translocation of the Palila doesn't work?
6. Is there flexibility in the 10,000 acres needed for the recovery area?
7. What will the appraisal cover for compensation to the ranchers? Reassignment of fixed costs to remaining lands? Replacement cost for improvements vs. expired services life? Who does the appraisal? State or FWS?

Bill Moore is preparing the minutes of the meeting and will provide a copy to me. We will gather more information for the ranchers and will call them within two weeks to establish a follow up meeting.

I asked Glenn Taguchi (again) for a time line for the lease withdrawal process. He explained that it depends on the scenario of land jurisdiction transfers. I am to State Forestry, to FWS, etc. A subdivision must be established with the County of Hawaii if the lands leave State jurisdiction. In any case, the Land Board must approve the lease withdrawal, as a minimum. We'll see where we are going on this within two weeks.







Job No.:

Project: Saddle Road  
Subject: Section 7 Millgallon  
Contractor: FHWA  
Meeting? DLNR - Honolulu  
Telephone?  
Place:  
Date: July 18, 1997  
Time: 2:30 pp  
By: William L. Moore  
Sheet 1 of 2



Attendees: Glenn Taguchi, DLNR Land Agent

DISCUSSION

I met with Glenn to provide an update of the project status. I informed Glenn that we were still waiting for final comments on the draft management concept for the lands involved in the paliia mitigation program. Until the comments are finalized, we will not be able to finalize the Biological Assessment. Furthermore, I told Glenn that we were still waiting for a final determination of the compensation program for the impacted ranchers. More specifically, FHWA is in the process of determining if the potential compensation is limited to the lease provisions or if they can go beyond that to replace lost income and/or fixed expenses. I told Glenn that as soon as the compensation process is resolved, we will be asking Land Management to begin discussions with the ranchers on the withdrawal process.

With respect to the overall process, Glenn indicated that the following steps would be required in order to withdraw the land from the ranchers (we also agreed that under the draft management concept, the lands must be withdrawn and managed by the Division of Forestry and Wildlife):

1. Land Board approval of the withdrawal of lands and assignment to DOFAW for management purposes.
2. Conduct survey of the paliia management area (PMA) to determine specific areas involved and obtain a map and bounds description of PMA and access roads.
3. Prepare a consolidation/resubdivision application for review and approval by the County for the PMA.
4. Initiate the withdrawal process from the ranchers
  - a. Determine carrying capacity of lands to be withdrawn (by licensed appraiser);
  - b. Determine rent reduction on balance of leased lands;
  - c. Determine value of improvements;
  - d. Determine lost income stream to Office of Hawaiian Affairs (present value of lease revenues);
  - e. As applicable, determine lost income stream to DLNR (present value);
  - f. As applicable, determine compensation beyond fair market value of improvements;

5. Review of appraisals by DLNR and FHWA.
6. Notification of ranchers of values, rent reductions, and compensation package.
7. If agreement, execute lease withdrawals and provide payment to ranchers.
8. If no agreement, initiate arbitration process pursuant to chapter 686, HRS.
9. Upon final approval of the consolidation/resubdivision, Execute an Executive Order assigning lands to DOFAW.

The key step in the overall process is the initial Land Board approval of the withdrawal and reassignment of land. Once this action is taken, the rest of the steps are ministerial in nature.

With respect to the appraisal of the land, Glenn suggested it may be prudent to retain a private appraiser rather than rely on the State appraisers. This would remove the view of a conflict of interest by DLNR and would provide a greater defense in the event that the appraisal is contested by the ranchers.

I will work with Glenn on assigning specific time estimates to each of the above cited steps. In the meantime, please call me if you have any questions.

Stephen K. Yamashiro  
Mayor



### County of Hawaii

25 Aupohihi Street, Room 215 • Hilo, Hawaii 96720-4132 • (808) 941-4211 • Fax (808) 961-4333  
KONA: 75-5706 Kaula Highway, Suite 103 • Kailua-Kona, Hawaii 96740  
(808) 328-3226 • Fax (808) 326-5663

William C. Davis  
Mayor, Director  
Henry Cho  
Deputy Managing Director



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 25TH INFANTRY DIVISION (LIGHT) AND U. S. ARMY, HAWAII  
SCHOFIELD BARRACKS, HAWAII 96857-6000  
JUNE 10, 1998

Office of the Commanding General

Mr. Allen W. Burden  
Federal Lands Highway Program  
400 Seventh Street S.W.  
Washington, D.C. 20590

Dear Mr. Smith:

May 27, 1998

Mr. Larry C. Smith  
Division Engineer  
U.S. Department of Transportation  
555 Zang Street  
P.O. Box 25246  
Denver, CO 80225-0246


Dear Mr. Smith:

Thank you for the invitation to attend the Partnering Session on paliia mitigation and the Saddle Road project June 30, 1998, at the Turtle Bay Hilton Resort.

I appreciate your including me in this important meeting and I am planning to attend unless there is an unexpected change in my schedule.

Thank you for organizing this session and seeking input on this vital project for the people of the Big Island. Best wishes for success on reaching an agreement that will move the Saddle Road improvement forward in the very near future.

Sincerely,

  
Stephen K. Yamashiro  
MAYOR

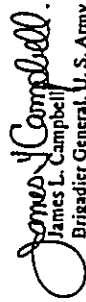
The Army supports the project to realign and improve Saddle Road. As the first responders to automobile accidents along a major portion of Saddle Road, we are reminded all too often just how dangerous this road is in its current condition. We appreciate the efforts of all involved in making this road safer for the military and the general public.

While any improvement to Saddle Road will benefit the military, the Army strongly supports the PTA-1 route, which moves the road to the northern edge of Pohakuloa Training Area. This alignment provides for the most improvement to the quality of training conducted at Pohakuloa. It removes a public thoroughfare from the middle of our prime training land, which in the past has caused conflicts between training and safety. It also provides the most separation between military and public traffic thereby increasing safety for both. The PTA-1 is the Army's alignment of choice.

Additionally, we feel that W-3 on the western side would better serve the needs of Pohakuloa Training Area. All of the ammunition and most of the heavy equipment used at Pohakuloa is brought up from the west side. The route currently passes through the residential areas of Waikoloa. Alignment of W-3, along with the planned state extension down to Highway 19, would eliminate the need to transport military cargo through Waikoloa.

The training we conduct at Pohakuloa Training Area is essential to maintaining the combat readiness of the Army units stationed in Hawaii, both active and reserve, and the National Guard. We need to continue to maintain and improve the training area. We look forward to continuing our partnership on this worthwhile project.

Most sincerely,

  
James L. Campbell  
Brigadier General, U. S. Army  
Acting Commander

Copy Furnished:  
Mr. Larry Smith  
Division Engineer, Central Federal Lands Highway Division  
Post Office Box 25246  
Denver, Colorado 80225



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
889 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

JUL - 1 1988

KAZUYASHIDA  
DIRECTOR

BY REPLY REFER TO:  
HIWY-PA  
2.9887

Mr. Larry C. Smith, P.E.  
Page 2

JUL - 1 1988

HIWY-PA 2.9887

We also feel that the mitigation measures proposed in the Section 404(b)(1) report for wetland impacts for this project are reasonable and adequate and that Alternatives EX-3 and E-3 of Sections III and IV, respectively, should be designated as the preferred alternative in compliance with the Section 404(b)(1) guidelines.

Thank you for coordinating this effort among the signatory agencies.

Very truly yours,

KAZU HAYASHIDA  
Director of Transportation

Mr. Larry C. Smith, P.E.  
Division Engineer  
Central Federal Lands Highway Division  
Federal Highway Administration  
U. S. Department of Transportation  
P. O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Smith:

Subject: Saddle Road, Project No. A-AD-6(1), Mammalohoa Highway (SR 190) to Milepost 6, National Environmental Policy Act (NEPA), Section 404 Integration Process

Pursuant to our review of the project's Section 404(b)(1) Analysis Report and in accordance with the Memorandum of Understanding on the NEPA and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii and the guidance papers to facilitate its implementation, we concur that:

1. Alternatives EX-3 and E-3 present the least environmentally damaging practical alternatives for Sections III and IV, respectively.
2. Due to the time involved in constructing this lengthy project, it would be in the best interest of the public and the participating agencies to advance the project in a timely manner by presenting the commitments mitigating the wetland impacts in a general schematic way in the Final Environmental Impact Statement (EIS) and the Record of Decision.
3. Since construction of the roadway portions outside of the Pohakuloa Training area will probably not occur within the next five years and since a Section 404 permit is valid for only three years, a re-evaluation of the EIS and the Section 404(b)(1) analysis report should be conducted prior to preparation of the construction plans to determine the final mitigation commitments. This will insure that the findings will be current and mitigation measures will be reflective of accepted practices and procedures at the time of construction.



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
STATE HISTORIC PRESERVATION DIVISION  
33 SOUTHERN STREET, SUITE FLOOR  
HONOLULU, HAWAII 96813

MICHAEL D. WILSON, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
DEPT. OF  
ON BEHALF OF THE GOVERNOR  
AGRICULTURE DEVELOPMENT  
PROGRAM  
AQUATIC RESOURCES  
CONSERVATION AND  
RESOURCES DIVISION  
CONSERVATION  
LAND AND WILDLIFE  
RESTORATION  
LAND DIVISION  
STATE PARKS  
WATER AND LAND DEVELOPMENT

REF: HP-JEN

JUN 15 1998

Mr. Larry C. Smith  
Division Engineer  
U.S. Department of Transportation  
Federal Highway Administration  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

LOG NO: 21570  
DOC NO: 9803PMZ2

Dear Mr. Smith:

**SUBJECT:** (HPD 16E). Review of Second Draft Report: "Archaeological, Historical, and Traditional Cultural Property Assessment for the Hawaii Defense Access Road A-AD-6(1) and South Road (SR 200) Project" (Langlas, Wolforth, and Head 1998)  
South Kohala, Hamakua, North Hilo and South Hilo Districts, Hawaii Island

Thank you for your letter of April 29, 1998, and the opportunity to review and comment on the revised draft of the subject report. It is our understanding that an addendum report on traditional cultural properties (TCP's) is being prepared and will be submitted at a later date for our review, and that the final report for this project will combine the results of both the archaeological survey and the TCP study.

As with the first draft, two of our staff have reviewed the present report. They have the following general comments to offer at this time. Our detailed comments, which are numbered to facilitate your consultant's response, are presented in Attachment 1.

We believe that the archaeological inventory survey of the project area was adequate, finding a total of 19 properties. Thirteen of these properties are newly identified. Of the six previously identified properties, three (5003, 14638 and 20852) are located outside of the Area of Potential Effect (APE) as initially defined, but are close enough to one of the proposed alignments that they could be adversely affected by the proposed road improvements or indirectly by use of the highway.

We agree with the significance evaluations for all 19 of the currently identified properties, except for that of Site 20852 (a burial), which we believe is also significant for the information it contains (Criterion D). With this change, which FHRI has unofficially agreed to (Tom Wolforth, personal communication), there are 10 properties significant for Criterion D only and 9 properties which are significant under multiple criteria.

Mr. Larry C. Smith  
Page 2

We agree in principle with the general mitigation treatments recommended for the 19 properties, with a couple of exceptions: (1) We believe that data recovery should also take place at Site 20854 given the basic questions that still exist about the age and function of the remains that comprise this property; (2) We do not agree with the proposed monitoring of Sites 7119 and 20878 because we believe that the portions of these properties that will remain intact outside of the road corridor can be adequately protected by fencing during construction. If you are agreeable to these changes the mitigation treatments for the 19 properties can be summarized as follows. The three properties located outside the APE (5003, 14638 and 20852) will be avoided. Sites 5002, 7119, 10309, 20878, 20864, 20865, 20862, 20856, 20869, 20872, 20877, 20872, and 20873 have been sufficiently well recorded that they will require no further work. Data recovery will be undertaken at three properties (20854, 20855 and 21150). As an additional mitigative measure, interpretive signage is planned for five properties (5002, 10309, 20864, 20870, and 21150). Interim mitigation measures may be needed to protect these properties during construction.

If you agree with the above suggested changes, we believe that you can proceed with preparing the Memorandum of Agreement (MOA), with the understanding that the final MOA cannot be approved until our office has had an opportunity to review and approve the addendum report on traditional cultural properties and these findings can be incorporated in the MOA if appropriate. If you have any questions, please call Pat McCoy (587-0006), the Hawaii Island archaeologist, or Holly McEldowney (587-0008) of the History and Culture Branch.

Aloha,

*Michael D. Wilson*  
MICHAEL D. WILSON, Chairperson and  
State Historic Preservation Officer

Attachment 1

Revisions Requested for Draft Report

*"Archaeological, Historical, and Traditional Cultural Property Assessment for the Hawaii'i Defense Access Road A-AD-6(I) and Saddle Road (SR 200) Project"*

(Langlas, Wolfarth, and Head and 1998)

Title

(1) The revised title of the report is, from our perspective, unsatisfactory because the work was undertaken to comply with the National Historic Preservation Act and is much more than an "assessment." It was an inventory survey and, indeed, this is how it is characterized in the Abstract. We recommend that the title be changed to more adequately reflect the scope of work. If the word "assessment" was chosen to conform with the EIS process, then you may want to consider a double title or subtitle.

Abstract

(2) Page ii, para. 1. We think it would be clearer to add the word "survey" after inventory in the first sentence, so that it would read "inventory survey."

(3) Page ii, para. 1. The comma in the last sentence should be placed after the word "amended." The way it reads now is that the NHPA was amended for this particular project.

(4) Page ii, para. 2. We suggest that the first sentence be changed to read "A total of 16 sites was observed and recorded within the area of potential effect (APE)."

(5) Page ii, para. 2. The site that is located nearby is not 5002; but 5003. Please correct. We are not sure what you mean when you say that the three sites located outside the APE were evaluated during the current project. Do the authors mean that the significance evaluations for these previously identified sites were re-evaluated? Please clarify this statement.

(6) Page ii, concerning recommended mitigation treatments.

(a) The statement that the 8 sites that are significant under Criterion D only will require no further work does not agree with the information in Table 8 where a total of 10 sites are listed as significant for this only criterion alone. This seems to be a wording problem that can be easily corrected.

(b) Site 20872 is mentioned twice in the list of 8 sites requiring no further work. Please correct this error.

Introduction

(7) In our first review letter (comment 9), we suggested that the authors use the word "properties" rather than "resources" to avoid confusion with other kinds of "cultural resources" that are not addressed in the report. There is no indication in Tom Wolfarth's Memo of May 1, 1998 that PHRI was unwilling to accept this recommendation, which we thus continue to make. This also applies to the title of the methods section.

Attachment  
Page 2

(8) In our comment 11, we asked that the summary of historical and ethnographic work in the Introduction states the major tasks performed to meet the study's objectives. This appears not to have been revised and no explanation is given for not making the revisions. These could be easily extracted from the more detailed discussion on pages 8 and 9.

Environmental Context

(9) Page 5, para. 4. The third sentence begins: "Much of the Saddle Road consists..." Should this read "...the Saddle and Humuhua consists..."?

Methods

(10) Page 11, para. 3. Since no artifacts were found in the limited testing undertaken in this project, much of what is said in this paragraph should be deleted.

Previous Archaeological Research

(11) First Review Letter, Comments 19 and 20. Wolfarth's memo of May 1, 1998 contains a brief explanation on PHRI's response to these two comments. The changes that have been made are in our view only partially satisfactory. We do not believe that there is any value, for example, in including in a summary table of previous archaeological work in the project corridor a number of reports on work outside the corridor, which are, moreover, never discussed in terms of what was found and the relevance of the findings.

(12) Page 15, para. 2. In a couple of places the authors use the word "recommended" where we think they should be saying "evaluated." If they agree, we suggest they make the change in wording.

(13) Page 15, para. 3. Welch excavated only one of the caves (Site 5003). Please correct.

(14) Page 19, para. 5. Allen and Kascko 1989 should be changed to read Athens and Kascko.

(15) Page 21, para. 1. Where did the authors find the name Kaluakako? The name that appears on the USGS Mauna Kea quadrangle map and the one that most people use in referring to this quarry is Keenakako'i.

Findings

(16) Page 61, para. 3. The abbreviated site numbers used in this paragraph may confuse the general reader, especially since these numbers are not used this way again. At some place in the text, perhaps in the preceding Previous Archaeology section, it would be good to have a general explanation of the site numbering system used by the SHPO, after which the authors could either keep the full number or resort to the short number.

Recommended Mitigation Treatments

(26) We are not completely convinced that no further work is required at Site 20854. The interpretation of this site indicates that the function and age of the remains are both open to question, thus indicating to us that there is more to be learned from a more detailed examination. We thus recommend that some minor data recovery work be undertaken at this site.

(27) Page 149, para. 3. Site 20872 is mentioned twice in the list of 8 sites requiring no further work. Please correct this error.

(28) Page 149 and elsewhere. The wording that an effect can be mitigated through reducing the effects in consultation with our office should be deleted. What the authors need to say is that the adverse effect will be mitigated based on an approved mitigation plan.

(29) For the sites evaluated as significant under multiple criteria, the authors have adopted what is to us a highly idiosyncratic and questionable methodology for dealing with mitigation. In the case of Site 5002 (what they call the Kn'ole Wall), for example, they first conclude that all of the information that makes this site significant under Criterion D has been collected and that no further work is required. They then proceed to say that because there will be adverse effects to the distinctive characteristics that makes the site significant under Criterion C there is a need for mitigation, which they argue can be achieved through design and construction considerations and consultation with SIPO.

(30) We do not understand how one can separate out different significance criteria and say that Criterion D will be mitigated through data recovery and the others through construction or design considerations and consultation with SIPO. We recommend that this wording and approach be deleted.

(31) Page 150, Table 9. This table should list all of the sites in the project area, including those for which the recommendation is no further work. This table is in our view unnecessarily complicated and difficult to read. There are some other problems, such as, for example, the way that the recommendations for Sites 5003 and 14638 are presented. In the Recommended Treatment Column both are noted as "Beyond Impact," while in the Effort column the information presented is "Avoid." Obviously, the latter belongs in the first column while "beyond impact" has no place in either column and in any case has already been stated in several places. We would like to suggest that the authors construct a matrix table like those commonly used in their other reports, with columns for: (1) no further work (NFW); (2) further data collection (FDC); (3) preservation "as is" (PAI) or (4) preservation with interpretive development (PID), and that they think about combining it with the significance evaluations as they had done in the first draft (Table 7). When the significance evaluations and recommended mitigation treatments are presented together in a single table it is much easier for the reader to see the relationship between the two. The detailed explanations for an evaluation and recommendation can then be presented in the text.

(32) Page 153, Overall. The last sentence should also make reference to NAGPRA for Federal lands (PTA) and Department of Hawaiian Home Lands (DHHL).

(17) Page 62, Table 6. "Cultural Association" is in our view an improper term to use for historic and prehistoric. We suggest that the authors change the column heading to something like "Period" or "Age." The information that is presented in the "Material Remains" column is not consistent. In some cases building materials, such as barbed wire, are noted; in other cases not. If the intention is to indicate what kinds of portable artifacts and middens were found associated with each site, then we suggest that the information presented be limited to this.

(18) Page 110, Site 20856. The description of this site varies throughout the text. On page 110 it is called a platform; in Table 6 a terrace and in Table 9 an historic paving. The site should be called the same thing throughout the report. Please correct this inconsistency.

Significance Evaluations

(19) Page 145. The paragraph following the outline of significance criteria seems unnecessary to us, but if the authors wish to keep it that is fine.

(20) Page 145, Site 20852. Chapter 280-2 says that burials have cultural significance for native Hawaiians, but it does not say that they are traditional cultural properties. Please delete the reference to the site as a traditional cultural property unless it is evaluated as being one under National Register Bulletin 38. Also, we believe that burials, like all historic sites, have information value. Just knowing that there are burials in this area is of information value. So, in cases with Hawaiian burials, these sites should be evaluated as being significant under both Criterion A and Criterion D.

(21) Page 145, Criterion D sites. The wording that is used here and elsewhere that SIPO recommended such and such should be removed. While it is true that we make recommendations on a variety of issues, including significance evaluations and mitigation treatments, the consultants and agencies to whom we address our comments have the right to either accept, reject or modify our suggestions after discussing them with us. In the present case, it appears that the authors have chosen to accept our recommendations. Because these are now being presented to us for concurrence, the current wording and repeated reference to our first review letter seem inappropriate.

(22) Page 145, Criterion D sites. Our second comment on this paragraph is that the authors need to insert the numbers for the two sites that Welch recorded.

(23) Page 146, Table 8. As already indicated, the authors should add D to the list of criteria for Site 20852. We also suggest that the 35 military sites be removed from this list because they are not part of the inventory and are thus not being evaluated for significance.

(24) Page 146, Site 20864. The description of the Saddle Road as having been built "to provide a pair-island access route in case of Japanese invasion" does not make sense to us. We think the authors probably mean "escape route," but they need to revise this sentence to make it clear.

(25) Page 146, Site 5002. The reason that this site, which in the project area is represented by three disturbed segments, is significant for Criterion C needs to be made clearer. It is not just "wall technology" per se.



RECEIVED AS FOLLOWS

## MEMORANDUM

## MEMORANDUM

DATE: August 18, 1998  
 TO: H. McElowney, P. McCoy, DLNR  
 FROM: T. Wolfarth, PHRI  
 RE: Saddle Road mitigation measures

Thank you for your June 15, 1998 letter with review comments on the Saddle Road report. We are making those revisions, and incorporating them into the MOA for this project. Your letter mentions 2 exceptions to the report's mitigation treatments, and summarizes the mitigation measures for 19 properties.

The structure of the summary implies several other exceptions to the report's mitigation treatments that have not been identified like the ones noted above. I want to bring these to your attention to clarify whether the summary presents your opinions on this matter. I want to make sure the MOA appropriately reflects the ultimate mitigation treatments. Site treatments that DLNR and the report agree on are not included in the following table.

#	Site	PHRI report	DLNR letter	MOA plans, subject to change
1	20854	No mitigation	Data recovery	Will recover data
2	7119	Monitor	No monitor	Will inspect periodically during construction
3	7119	Signage	No signage	Signage?
4	20876	Monitor	No monitor	Will inspect periodically during construction
6	10309	Data recovery	No data recovery	No data recovery?
8	5002	No signage	Signage	No signage?

#1: we plan to call for data recovery in the MOA.  
 #2 and 4: we will call for periodic inspection of the construction activity, instead of calling for full-time monitoring of the construction activity.  
 #6: do you really want signage on this wall? It is highly disturbed, and we have no information on who is responsible for it, or when exactly it was built.  
 #3: do you really not want signage for this wall? It is in much better condition than Site 5002 wall, and has a direct connection to the Humuhumu Sheep Station.  
 #8: a portion of that trail will be destroyed. Shouldn't we recover the data from that portion?

Site 20872 is listed twice in the same sentence as needing no further work. Is one of these references a typo that should be another site number, or is it merely a double listing?

Please call (969-1763) or fax (961-5028). If the June 15 letter does represent your opinions on this matter, I will proceed to incorporate those in the MOA as related in the "DLNR letter" column in the table above. If the letter contains typos or overights, I can make changes based on your verbal or fax communication, and wait for a DLNR follow-up letter documenting the official recommendations. Thanks for your time and effort in these matters.

DATE: August 28, 1998

TO: File  
 FROM: Tom Wolfarth, PHRI *Tam Wolfarth*  
 RE: Phone conversation with SHPO re: review letter

I spoke with Pat McCoy, SHPO review archaeologist, after sending a fax dated August 18, 1998. The fax pointed out apparent errors in the SHPO letter that reviewed the revised inventory report for the Saddle Road project. These apparent errors needed resolution prior to proceeding with the draft MOA and revisions to the inventory report. The fax provided several suggestions for appropriate resolution, asked for answers to several questions regarding treatment, and requested that the SHPO provide a letter documenting concurrence with the suggested resolutions. Relevant portions of the text from the fax follow:

Site treatments that DLNR and the report agree on are not included in the following table.

#	Site	PHRI report	DLNR letter	MOA plans, subject to change
1	20854	No mitigation	Data recovery	Will recover data
2	7119	Monitor	No monitor	Will inspect periodically during construction
3	7119	Signage	No signage	Signage?
4	20876	Monitor	No monitor	Will inspect periodically during construction
6	10309	Data recovery	No data recovery	No data recovery?
8	5002	No signage	Signage	No signage?

#1: we plan to call for data recovery in the MOA.  
 #2 and 4: we will call for periodic inspection of the construction activity, instead of calling for full-time monitoring of the construction activity.  
 #6: do you really want signage on this wall? It is highly disturbed, and we have no information on who is responsible for it, or when exactly it was built.  
 #3: do you really not want signage for this wall? It is in much better condition than Site 5002 wall, and has a direct connection to the Humuhumu Sheep Station.  
 #8: a portion of that trail will be destroyed. Shouldn't we recover the data from that portion?

Site 20872 is listed twice in the same sentence as needing no further work. Is one of these references a typo that should be another site number, or is it merely a double listing?

During the phone conversation, Dr. McCoy provided the following responses:

- Concurrence with #1, 2, and 4.
- #6: No signage.
- #3: Include signage.
- #8: No data recovery.
- Site 20872 was a double listing.

He also indicated that the SHPO would not be providing a letter on this matter, and that this phone conversation was sufficient for transmittal of this information.



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Pacific Islands Ecoregion  
300 Ala Moana Boulevard, Room 3-122  
Box 50888  
Honolulu, Hawaii 96830

Mr. Larry Smith  
Division Engineer  
Federal Highway Administration  
Central Federal Lands Highway Division  
555 Zang Street  
Denver, CO 80228

JUL 17 1998

Re: 404(b)(1) Analysis Report, Saddle Road (SR 200), Mamelahoa Highway to Milepost 6,  
Island of Hawaii

Dear Mr. Smith,

The Fish and Wildlife Service (Service) has reviewed the 404(b)(1) Analysis Report (Report) for the proposed Saddle Road (SR 200) Project, Mamelahoa Highway to Milepost 6, Island of Hawaii. This letter has been prepared under the authority of and in accordance with provisions of the National Environmental Policy Act of 1969 [42 U.S.C. 4321 *et seq.*; 83 Stat. 852], as amended, the Fish and Wildlife Coordination Act of 1934 [16 U.S.C. 661 *et seq.*; 48 Stat. 401], as amended, and other authorities mandating Service concern for environmental values. As a signatory agency of the Memorandum of Understanding for the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects, the Service offers the following comments for your consideration.

The Service concurs with the selection of alignments EX-3 (Section III) and E-3 (Section IV) as the Least Environmentally Damaging Practicable Alternative. The Service has determined that the impacts to native ecosystems of the two alternative alignments in section IV are roughly equivalent. Therefore, selection of the preferred alternative for section IV can justifiably be made using other criteria. The Service concurs on the adequacy and correctness of the scientific information, engineering data and analysis, and the factual determinations in Appendix A of the Report.

In previous communications to your agency, the Service presented its analysis of the importance of the wetlands in sections III and IV of the project area, and outlined the steps we believed would adequately mitigate for the impacts to these wetlands. These steps included acquisition and protective management of a natural forested wetland area near the project area. After review of the detailed wetlands analysis presented in the Report, the Service is substantially in agreement with your consultant, Dr. Grant Gerrish, on the function of these wetlands and their wide distribution within the project area. During follow-up discussions with your agency, the Hawaii Department of Transportation, and the project consultants, mitigation strategies more appropriate to the project area were developed. The conceptual mitigation plans outlined in the Report reflect these cooperatively developed strategies.

Mr. Larry Smith  
Saddle Road 404(b)(1) Comments, cont'd.

2

The Service concurs that the wetlands mitigation strategy outlined in Appendix A of the Report is adequate for the Final Environmental Impact Statement and Record of Decision, and should be the basis for more detailed mitigation plans to be developed for sections III and IV of the project.

We concur that commitments to mitigation for wetlands impacts and formulation of more detailed mitigation plans may be deferred until funding for development of the relevant road sections is obtained. Similarly, we concur that individual Section 404 permits may be deferred until that time. The Service will be pleased to provide technical assistance on wetland delineation, revegetation techniques, pullout locations, and other aspects of the mitigation proposal at any time.

It should be noted that our concurrence with the proposed wetland mitigation strategy is entirely specific to this project, and reflects the Service's assessment of impact to very narrow wetland strips along an existing road corridor. Therefore, this mitigation strategy should not be considered a precedent or template for future projects, especially projects that impact larger contiguous areas of forested wetlands. The Service looks forward to working further with your agency and design team to minimize impacts to wetlands and native communities as design for sections III and IV proceeds. If you have questions regarding these comments, please contact Don Palawski, Assistant Field Supervisor for Habitat Conservation, at 808/541-3441.

Sincerely,

Robert P. Smith  
Pacific Islands Manager

cc: USEPA, Honolulu  
USACE, Honolulu



US Department  
of Transportation  
Federal Highway  
Administration

555 Zang Street, Room 259

Highway Division

Central Federal Lands

Lakewood, CO 80228

JUN 18 1998

In Reply Refer To:  
HPD16E/Saddle Road

**See Addressee List:**

As indicated in our letter of May 20 requesting your participation in the Palila Mitigation partnering meeting for Saddle Road on June 30, we are transmitting additional information for your use in preparation for the meeting. In addition to a revised Agenda which indicates a meeting room change and an additional briefing presentation, we have enclosed: a fact sheet outlining the main elements of the proposed mitigation plan as presented in the Biological Assessment, a proposed cost estimate and implementation schedule for the plan, a Section 7 process flowchart which we will review at the meeting, a map depicting mitigation sites, and a Draft Memorandum of Understanding (MOU) outlining key requirements of the plan.

It should be noted that the enclosed MOU should be considered a "straw man" document designed to initiate discussions on the key elements of the proposed plan. The format and text of this document is open to complete revision, subject to a consensus of all participants. It was our intent, based on our initial discussions with you in our late May and early June meetings on this subject, to present in this document what was understood to be the main requirements of the participating agencies. We will have a lap top computer and projector available at the meeting for group word smithing of this document or to create a completely new one.

We look forward to your participation in the meeting. I am available by phone at (303)716-2003 to discuss any details with you at your convenience, or you may call Mr. Bert McCauley, Environmental Project Manager at (303)716-2141 with any questions regarding planning of the meeting.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

**Enclosures:**

Revised Agenda, Mitigation Plan Fact Sheet, Mitigation Cost Estimate and Schedule,  
Section 7 Process Flow Chart, Mitigation Sites Map, and Draft Memorandum of Understanding

cc (w/enclosures):

Mr. Donald Okahara, Principle, Okahara & Associates, 200 Kohola Street, Hilo, HI 96720  
Ms. Nancy Burns, Sr. Project Engineer, Okahara & Associates, 73-5574 Maiuu Street, Bay 6B,  
Kailua-Kona, HI 96740

**Addressees:**

Mr. Peter M. Cline, Senior Engineer  
Military Traffic Management Command  
720 Thimble Shoals Boulevard, Suite 130  
Newport News, VA 23606-2574

Mr. Wayne Hamaguchi, Chief  
Planning Branch  
U.S. Army Pacific Command, Hawaii  
Attn: APEN-IF  
Building 104  
Fort Shafter, HI 96858-5100

Col. Barry N. Totten, Director  
Dept. of Public Works  
U.S. Army Garrison-Hawaii  
Building 300  
Schofield Barracks, HI 96857-5000

LTC David Hergengroeder, Commander  
HQ, PTA, USAG-HI  
Bldg T-180  
Milepost 36, H200 (Saddle Road)  
Hilo, HI 96720

Mr. Robert Smith, Manager  
U.S. Fish & Wildlife Service  
Pacific Islands Office  
300 Ala Moana Blvd., Room 3108  
Honolulu, HI 96850  
cc: Mr. Brooks Harper, Field Supervisor

Mr. Kazu Hayashida, Director  
Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813-5097  
cc: Mr. Kenneth Au, Advance Planning  
Engineer

Mr. Michael Wilson, Director  
Department of Land & Natural Resources  
P.O. Box 621  
Honolulu, HI 96809  
cc: Mr. Gil Coloma-Agaran, Deputy Director  
Mr. Mike Buck, Administrator, DOFAW

Mr. Sam Callejo, Chief of Staff  
Office of the Governor  
State of Hawaii  
State Capitol  
Honolulu, HI 96813

Dr. William Steiner, Director  
USGS Biological Research Division  
Pacific Islands Ecosystem Research Center  
Hawaii Field Station  
P.O. Box 44  
Hawaii National Park, HI 96718  
cc: Mr. Paul Banko

Honorable Stephen Yamashiro  
Mayor, County of Hawaii  
25 Aupuni Street, Room 215  
Hilo, HI 96720

Maj. Gen. Alexis T. Lum  
Executive Assistant  
Office of Senator Daniel K. Inouye  
Federal Building  
300 Ala Moana Blvd., Room 7325  
Honolulu, HI 96850  
cc: Ms. Jennifer Sabas, Chief of Staff - HI

Mr. Abraham Y. Wong  
Division Administrator  
FHWA HI Division  
Federal Building  
300 Ala Moana Blvd., Room 3202  
Honolulu, HI 96850  
cc: Glenn Yasui, Sr. Transportation  
Engineer

**Palila Mitigation Partnering Session**

June 30, 1998  
Turtle Bay Hilton  
Sea Tide Room  
8:00 A.M.

**PTA-1 PALILA MITIGATION PLAN  
FACT SHEET**

The construction of the PTA-1 alignment will modify 41.5 hectares (102 acres) of Palila Critical Habitat (PCH) within the Pohakuloa Training Area (PTA). The elements of the mitigation plan designed to offset this impact are as follows:

1. Three parcels of land totaling approximately 3,782 ha (9,345 ac) will be provided to replace the viability of the Pohakuloa Flats area as a potential Palila recovery area. These PCH replacement lands are detailed as follows:
  - ▶ Pu'u Mali (north slope of Mauna Kea): 1,864 ha (4,606 ac)
  - ▶ Ka'ohē Lease lands (southwest of existing Palila core population): 704 ha (1,740 ac)
  - ▶ Kipuka 'Alala (within PTA on southwestern boundary): 1,214 ha (3,000 ac)
2. Management of these lands will include the following activities:
  - ▶ All lands will be fenced to exclude feral ungulates.
  - ▶ Feral ungulates will be driven out of the Kipuka 'Alala parcel at the time of fencing and any remaining feral ungulates will be harvested.
  - ▶ Management actions on all three parcels will focus on restoring and rehabilitating mamane forest over a 10 year period using methods including but not limited to, invasive weed control, mamane propagation, scarifying, and ungulate control.
  - ▶ Predator control and monitoring will be provided on the parcels for a period of 10 years.
  - ▶ Grass will be controlled on the Ka'ohē lease parcel by providing a special mower and a part-time employee for a period of 5 years.
  - ▶ Palila birds will be translocated to the Pu'u Mali parcels once mamane restoration is evident.
  - ▶ Bird translocations will be monitored for a period of 10 years.
  - ▶ An Oversight Committee consisting of representatives from each of the stakeholder agencies will direct the implementation of the plan using Adaptive Management policies.
3. Fire mitigation for direct impacts of the roadway will include:
  - ▶ A paved "fire break" along the length of PTA-1 as detailed in the Biological Assessment.
  - ▶ Emergency telephones located approximately every 2 kilometers along PTA-1.
  - ▶ Retaining a fire ecologist for a period of 3 years to develop a comprehensive interagency fire management plan complete with risk assessment protocols for all lands within and adjacent to the PTA-1 alignment and the PCH replacement lands.
4. Alien species mitigation for secondary and cumulative effects of the roadway will include:
  - ▶ A baseline study of invertebrates found along the alignment within the Saddle (previously completed by the Bishop Museum).
  - ▶ Continuing study of the impacts of alien insects and parasitic wasps on invertebrate food resources of the Palila.
  - ▶ The control of invasive weed and grass species along the Right-of-Way during construction.
  - ▶ Continued roadside monitoring and control by HDOT of alien grasses and invasive weeds following transfer of the completed roadway.
  - ▶ Numerous special contract provisions in the construction documents which will place limitations and special environmental requirements on contractor activities.

<b>8:00</b>	<b>Start Up</b>	<b>30 Minutes</b>
▶	Welcome.....	Senator Daniel K. Inouye
▶	Meeting Purpose and Introductions.....	Larry Smith
▶	Meeting Goals, Agenda, Operation.....	FHWV Division Engineer Peter Adler
		The Accord Group
<b>8:30</b>	<b>Building Partnerships: Opportunities, Dilemmas, Synergies</b>	<b>45 Minutes</b>
▶	Simulation Problem.....	Peter Adler
▶	Applications to Saddle Road	
<b>9:15</b>	<b>Briefing</b>	<b>45 Minutes</b>
▶	PTA Training Mission and PTA-1.....	LTC David Hergencroder PTA Commander
▶	Section 7 Consultation History.....	Bert McCauley Environmental Project Mgr
▶	Scientific Basis for Mitigation Plan.....	Paul Banko USGS Biological Resources Div.
▶	Mitigation Plan Summary.....	Reginald David Rana Productions, Ltd.
<b>10:30</b>	<b>Break</b>	<b>15 Minutes</b>
<b>10:45</b>	<b>Discussion</b>	<b>75 Minutes</b>
▶	Questions, Clarification, Comments.....	Peter Adler
▶	Mitigation Certainties, Uncertainties, Agreements, Disagreements	
▶	Key Themes and Issues	
<b>12:00</b>	<b>Lunch</b>	<b>90 Minutes</b>
<b>1:30</b>	<b>Lessons Learned from Great Partnerships</b>	<b>15 Minutes</b>
▶	Apollo 13.....	Peter Adler
▶	Organizing <i>Genius</i> by Bemis & Bierdeman	
<b>1:45</b>	<b>Discussion (Continued)</b>	<b>Until Closing</b>
▶	Resolution of Core Questions.....	Peter Adler
▶	Review and Finalization of Draft Agreement	

DRAFT

JUNE 1998

MEMORANDUM OF UNDERSTANDING

Regarding Implementation of the Saddle Road Palila Critical Habitat Impact Mitigation

BETWEEN:

The United States Department of Transportation, Federal Highway Administration (FHWA), the Hawaii Department of Transportation (HDOT), the United States Department of the Army through the U.S. Army Garrison-Hawaii (USARG-H) and the Military Traffic Management Command (MTMC), the State of Hawaii Department of Land and Natural Resources (DLNR) through the Division of Forestry and Wildlife (DOFAW) and Land Division, the United States Fish and Wildlife Service (USFWS), and the Biological Resource Division of the United States Geological Survey (BRD/USGS).

WHEREAS, the United States Department of Transportation, Federal Highway Administration (FHWA) in cooperation with the Hawaii Department of Transportation (HDOT) are proposing to realign and improve the Saddle Road, State of Hawaii Route 200 (SR 200); and

WHEREAS, the United States Department of the Army, Military Traffic Management Command (MTMC) is serving in concert with the FHWA as co-administrators of the federal funds involved; and

WHEREAS, the purpose and need for the project includes the separation of military and civilian traffic and improved training conditions at Pohakuloa Training Area (PTA); and

WHEREAS, the PTA-1 alignment as presented in the Draft Environmental Impact Statement (DEIS) best fulfills the project purpose and need; and

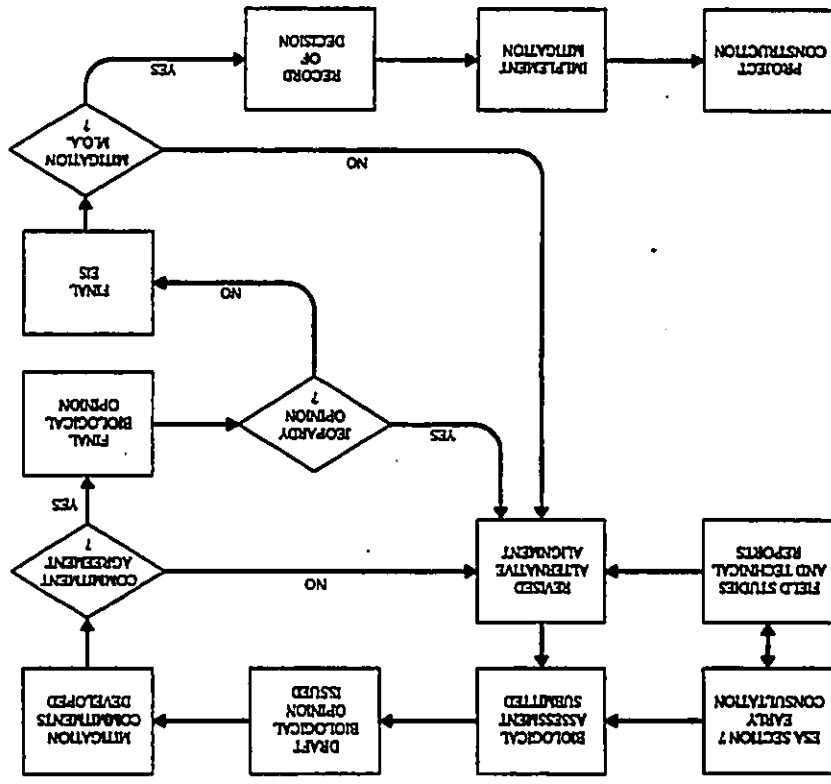
WHEREAS, the PTA-1 alignment impacts approximately 41.5 hectares of federally designated Palila Critical Habitat (PCH); and

WHEREAS, representatives of the FHWA, USFWS, DLNR, DOPAW, HDOT, USARG-H, MTMC, and the BRD/USGS as technical consultant have consulted pursuant to the guidelines of Section 7 of the Endangered Species Act to develop appropriate mitigation measures to compensate for impacts to the Palila Critical Habitat; and

WHEREAS, the Palila Mitigation Plan as presented in the *Biological Assessment of the Hanalei State Route 200 (BA)* for the PTA-1 alternative in Technical Appendix Volume III of the DEIS which includes the provision of Palila Critical Habitat replacement lands, represents a reasonable public expenditure after considering the impacts of the proposed project and the benefits of the proposed mitigation measures; and

WHEREAS, interagency agreements are required to ensure that the Palila Mitigation Plan is implemented as required by FHWA policy under the National Environmental Policy Act (NEPA) and Council for Environmental Quality (CEQ) regulations and by USFWS policy under the Endangered Species Act (ESA), and

SADDLE ROAD PROJECT - SECTION 7 PROCESS



WHEREAS, the primary objective of all elements of the Palila Mitigation Plan shall be to provide reasonable mitigation for the Recommended Alternative within the context of the larger goal of the ultimate recovery of the Palila bird in the State of Hawaii.

THEREFORE, it is mutually agreed that the Stipulations in this Memorandum of Understanding (MOU) provide the basis for implementing the mitigation plan as presented in the BA and subsequent mitigation requirements identified in the Biological Opinion (BO) of the USFWS to advance the proposed Saddle Road Project to completion.

#### STIPULATIONS

##### I. Foundation for Agreement

- A. The PTA-1 alignment, as presented in the DEIS, fulfills the project purpose and need with respect to the Pohakuloa Training Area mission and increased public and military transportation safety and, therefore, should be the Recommended Alternative presented in the Final EIS (FEIS) for advancement to construction.
- B. The Palila Mitigation Plan, as presented in the Biological Assessment for the PTA-1 alignment, is necessary and must be implemented according to the elements specified to ensure the successful completion of the proposed Saddle Road Project.

##### II. Implementation Procedures

- A. In order to execute the Record of Decision (ROD) for the proposed Saddle Road project, Memorandum of Agreements (MOA) will be required between the signatory parties to this MOU to further refine the mitigation plan implementation responsibilities outlined in this MOU.
- B. In order to proceed with the proposed Saddle Road project in a timely fashion, the MOA are required to be executed by the signatory parties to this MOU no later than 60 days after issuance of the Final Biological Opinion by the USFWS.
- C. In order to implement the mitigation plan, funding in the estimated amounts and scheduled as indicated on the attached Appendix A, "Palila Mitigation Cost Estimate Itemization and Implementation Schedule" as amended, will be required.
- D. Recognizing the limitations of the federal funding appropriations process, the signatory parties to this MOU agree to proceed with the mitigation plan implementation based upon a commitment by the project sponsors to diligently pursue the required funding by any and all means possible.
- E. Mitigation funds allocated to mitigation plan elements outside the limits of the proposed Saddle Road project and/or in conjunction with the PCH replacement lands may be administered by a mutually agreeable third party provided these funds are not used for any other purposes.

F. The signatory parties agree to use guidance papers to ensure the intended implementation of the Palila mitigation plan and the responsible expenditure of allocated funds. These guidance papers include the following:

1. "Biological Assessment of the Hawaii State Route 200 - Mamalahoa Highway to Milepost 6 Saddle Road Realignment Project, Island of Hawaii, Hawaii".
2. The Biological Opinion of the U.S. Fish and Wildlife Service for the Saddle Road Realignment and Improvement Project.
3. The USFWS Palila Recovery Plan, and all updates to this plan.

G. The primary goal of management actions regarding PCH replacement lands shall be the long-term restoration of a viable mamane forest, the expansion and/or re-introduction of Palila population, and the control of Palila predators and alien species detrimental to Palila.

H. In the absence of definitive scientific information, any proposed management actions regarding potential usage of the PCH replacement lands shall be empirically evaluated by trial or tests and permitted on the whole of the lands only if the proposed usage does not compromise the primary goal.

I. Recognizing that habitat restoration is not completely understood in this instance, the signatory parties agree that an adaptive management policy should be used to evaluate proposed management actions on the PCH replacement lands. Adaptive management is defined as basing plan implementation decisions on data collected and various management strategy trials conducted both on and off site.

J. Consistent with an adaptive management approach, an oversight committee consisting of representatives from the DOWAW, USFWS, BRD/USGS and in the case of the Kipuka 'Alala lands, the U.S. Army will be responsible for reviewing ongoing management actions and formulating management plans based on the data gathered on site and on the latest technical information available.

K. Recognizing that all of the mitigation lands are owned by the State of Hawaii, all management plans or actions developed or recommended by the oversight committee for the PCH replacement lands must be approved by the State of Hawaii Department of Land and Natural Resources (DLNR) and activities on these State lands must be in accordance with all DLNR rules and regulations.

##### III. Mitigation Plan Evaluation and Planning

A. The oversight committee will, at a minimum, meet annually to evaluate the success of the current year Palila mitigation management actions and determine future actions or changes in the plan.

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JUNE 1998

- B. Once a year, the oversight committee will be responsible for submitting funding proposals and any modifications in the use of these funds within the mitigation plan framework to the funding agency in a timely manner for review and approval.
- C. The oversight committee will develop rules and procedures for the conduct of business, review of adaptive management results, modification of mitigation plan strategies, and approval of mitigation plan funding proposals.
- D. The oversight committee will be responsible for determining rules and procedures governing dispute resolution in the event of disagreement on mitigation plan modifications or proposed management actions, proposed funding uses or expenditures, lack of performance by any signatory parties or their agents, substantive departures from this MOU, or other unforeseen disagreements which impede the implementation of the mitigation plan.

IV. Agency Commitments

A. The MTMC agrees to:

- 1. Seek funding appropriations and allocate funding so appropriated for mitigation costs in accordance with the estimates, schedule, and programs identified in Appendix A, "Palila Mitigation Cost Estimate Itemization and Implementation Schedule" as amended.
- 2. Commit resources to finalizing and executing the necessary MOA in a timely manner.

B. USARG-H agrees to:

- 1. Seek funding appropriations and allocate funding so appropriated for mitigation costs in accordance with the estimates, schedule, and programs identified in Appendix A "Palila Mitigation Cost Estimate Itemization and Implementation Schedule" as amended.
- 2. In the case of Kipuka 'Alala, commit Ecosystems Management Plan funding for the required fencing and ungulate control.
- 3. In the case of Kipuka 'Alala, commit Ecosystems Management Plan funding to the restoration of Palila by cooperating with necessary predator and alien species control and mamane reforestation or protection efforts.
- 4. Commit Ecosystem Management Plan funds to the Palila Food Source Alien Insect Study.

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JUNE 1998

- 5. Accept primary responsibility for responding to and fighting fire within the PTA.
  - 6. Coordinate fire prevention and suppression activities and planning with the fire ecologist and cooperate in the development of a comprehensive, interagency fire plan.
  - 7. Coordinate with and assist signatory parties in execution of the palila mitigation measures outlined in the USFWS Biological Opinion.
  - 8. Commit resources to finalizing and executing the necessary MOA in a timely manner.
- C. The USFWS agrees to:
- 1. Commit resources to finalizing the Biological Opinion in a timely manner.
  - 2. Coordinate with and assist signatory parties in execution of the palila mitigation measures outlined in the USFWS Biological Opinion.
  - 3. Provide input to the FHWA environmental manual containing environmental issues and specific mitigation requirements and procedures that will be required of the construction contractor.
  - 4. Coordinate fire prevention and suppression activities and planning with the fire ecologist and cooperate in the development of a comprehensive, multi-agency fire plan.
- D. The BRD/USGS agrees to:
- 1. Coordinate with and assist signatory parties in execution of the palila mitigation measures outlined in the USFWS Biological Opinion
  - 2. Provide input to the FHWA environmental manual containing environmental issues and specific mitigation requirements and procedures that will be required of the construction contractor.
  - 3. Coordinate fire prevention and suppression activities and planning with the fire ecologist and cooperate in the development of a comprehensive, interagency fire plan.
  - 4. Commit resources to finalizing and executing the necessary MOA in a timely manner.
- E. The DOP/AV agrees to:
- 1. Coordinate with and assist signatory parties in execution of the palila

mitigation measures outlined in the USFWS Biological Opinion

- 2. Provide input to the FHWA environmental manual containing environmental issues and specific mitigation requirements and procedures that will be required of the construction contractor.
- 3. Coordinate fire prevention and suppression activities and planning with the fire ecologist and cooperate in the development of a comprehensive, interagency fire plan.
- 4. Commit resources to finalizing and executing the necessary MOA in a timely manner.

F. The DLNR Land Division agrees to:

- 1. Coordinate with and assist signatory parties in execution of the palila mitigation measures outlined in the USFWS Biological Opinion.
- 2. Assist the FHWA and HDOT in compensation negotiations with current lessees of the PCH replacement lands.
- 3. Commit resources to finalizing and executing the necessary MOA in a timely manner.

G. The FHWA agrees to:

- 1. Coordinate with and assist signatory parties in execution of the palila mitigation measures outlined in the USFWS Biological Opinion
- 2. Ensure the design and construction of the proposed Saddle Road project in accordance with the requirements of the USFWS Biological Opinion.
- 3. Ensure the retention of a fire ecologist who will be responsible for developing a comprehensive fire management plan in accordance with the USFWS Biological Opinion.
- 4. Require construction specifications that minimize the potential for alien species dispersal during construction in accordance with the requirements of the USFWS Biological Opinion.
- 5. Provide a comprehensive manual which outlines environmental issues and procedures that will be required of the construction contractor.
- 6. Coordinate with the DLNR and current lessees of mitigation lands to determine appropriate lease termination compensation.
- 7. Establish accounts to reimburse HDOT for all right-of-way related work

in securing the transfer of the PCH replacement land parcels from their existing uses or otherwise effect this transfer with project funds.

- 8. Commit resources to finalizing and executing the necessary MOA in a timely manner.

H. The HDOT agrees to:

- 1. Coordinate with and assist signatory parties in execution of the palila mitigation measures outlined in the USFWS Biological Opinion
- 2. Maintain the completed roadway to control alien roadside weed and grass growth throughout the life of the project.
- 3. Perform all administrative and right-of-way related work to ensure subdivision and transfer of the PCH replacement land parcels.
- 4. Maintain the emergency telephone installation within PTA in good working order throughout the life of the project.

V. Appendices

- A. Palila Mitigation Cost Estimate Itemization and Implementation Schedule.
- B. Maps of Palila Critical Habitat replacement lands.

\_\_\_\_\_  
 Larry C. Smith, Division Engineer  
 Federal Highway Administration, Central Federal Lands Division  
 Date \_\_\_\_\_

\_\_\_\_\_  
 Kazu Hayashida, Director  
 Hawaii Department of Transportation  
 Date \_\_\_\_\_

\_\_\_\_\_  
 Peter Cline, Senior Engineer  
 Military Traffic Management Command  
 Date \_\_\_\_\_

\_\_\_\_\_  
 Col. Barry N. Totten, Director  
 Department of Public Works, USARG-H  
 Date \_\_\_\_\_



DRAFT

JUNE 1998

Robert Smith, Manager  
U.S. Fish and Wildlife Service, Pacific Islands Office

Date

Michael Wilson, Director  
Department of Land and Natural Resources

Date

Dr. William Steiner, Director  
USGS Biological Research Division  
Pacific Islands Ecosystem Research Center

Date

FISCAL YEAR	ITEM	UNIT COST	AGENCY OR PROGRAM	COMMENTS
2000	Land Treatment	\$2,000,000.00	DAR	Includes lease compensation and restoration, Land Board application, & administrative costs.
	Additional expenditure for fire shoulders	\$340,000.00	DAR	
	Biological Services Contract Requirements	\$250,000.00	DAR	Restricted contract operations, special equipment handling, etc. (included in construction costs).
	Fire ecology - year 1 of 3	\$50,000.00	DAR	Does not include other agency costs for coordination efforts.
	Fencing at Puvak and Kariba Lands	\$737,000.00	UNKNOWN	
	Species at Kariba Ayla	\$291,000.00	EMP - USARG-H	
	Vegetation control at Kariba Ayla - year 1 of 3	\$83,000.00	EMP - USARG-H	
	Palaia vegetation and monitoring - year 1 of 3	\$450,000.00	UNKNOWN	
	Predator & alien species control - year 1 of 3	\$150,000.00	EMP - USARG-H	
	Alien Insect Study	\$30,000.00	UNKNOWN	
	Monitors for Kariba Large Lands	\$30,000.00	UNKNOWN	
	Monitors for Kariba Large Lands - year 1 of 3	\$15,000.00	UNKNOWN	
	Contract administration	\$14,000.00	UNKNOWN	
	TOTAL	\$5,360,000.00		
	Project construction items do not require contract administration support @ 25%.			
	DAR = \$2,840,000, EMP = \$624,000, UNKNOWN = \$1,877,000			
2001	Third Fire Break shoulder and apparatus	\$4,335,000.00	DAR	Assumes FY '00 project will include paving (included in construction costs).
	Emergency Response Contract Requirements	\$250,000.00	DAR	Restricted contract operations, special equipment handling, etc. (included in construction costs).
	Fire ecology - year 2 of 3	\$50,000.00	DAR	
	Vegetation control at Kariba Ayla - year 2 of 3	\$83,000.00	EMP - USARG-H	
	Palaia vegetation and monitoring - year 2 of 3	\$450,000.00	UNKNOWN	
	Predator & alien species control - year 2 of 3	\$150,000.00	EMP - USARG-H	
	Contract administration	\$14,000.00	UNKNOWN	
	Monitors for Kariba Large Lands - year 2 of 3	\$15,000.00	UNKNOWN	
	Lower operator labor - year 2 of 3	\$15,000.00	UNKNOWN	
	Contract administration	\$17,000.00	UNKNOWN	
	TOTAL	\$5,645,000.00		
	Project construction items do not require contract administration support @ 25%.			
	DAR = \$4,760,000, EMP = \$83,000, UNKNOWN = \$802,000			
2002	Fire ecology - year 3 of 3	\$50,000.00	DAR	
	Vegetation control at Kariba Ayla - year 3 of 3	\$83,000.00	EMP - USARG-H	
	Palaia vegetation and monitoring - year 3 of 3	\$450,000.00	UNKNOWN	
	Predator & alien species control - year 3 of 3	\$150,000.00	UNKNOWN	
	Lower operator labor - year 3 of 3	\$15,000.00	UNKNOWN	
	Contract administration	\$17,000.00	UNKNOWN	
	TOTAL	\$1,172,000.00		
	Project construction items do not require contract administration support @ 25%.			
	DAR = \$1,172,000, EMP = \$0, UNKNOWN = \$0			
2003-04	Palaia vegetation and monitoring - year 4 and 5	\$450,000.00	UNKNOWN	
	Predator & alien species control - year 4 and 5	\$150,000.00	UNKNOWN	
	Lower operator labor - year 4 and 5	\$15,000.00	UNKNOWN	
	Contract administration	\$15,000.00	UNKNOWN	
	TOTAL	\$769,000.00		
	Project construction items do not require contract administration support @ 25%.			
	UNKNOWN = \$769,000, EMP = \$0, UNKNOWN = \$0			
2005-09	Palaia vegetation and monitoring - year 6 - 10	\$100,000.00	UNKNOWN	
	Predator & alien species control - year 6 - 10	\$75,000.00	UNKNOWN	
	Contract administration	\$24,000.00	UNKNOWN	
	TOTAL	\$249,000.00		
	Project construction items do not require contract administration support @ 25%.			
	UNKNOWN = \$249,000, EMP = \$0, UNKNOWN = \$0			
	Grand Total FY 1999 through 2008	\$14,573,000.00		
	See Table 7, Biological Assessment, for functional schedule of cost estimates.			
	Revised to reflect \$1,000. Does not include \$90,000 previously expended on EIS baseline investigative study.			
	1. Fiscal Year of actual item implementation will depend on completion of Environmental Assessment process.			
	2. Scheduling and sequence of item implementation is to be determined by implementing agency based on final program needs.			

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03/11/98 16:27 FAX 1 808 329 1006 OKAHARA-KONA  
03/11/98 06:55 FAX 0808 861 8888 OKAHARA & ASSOC. --- O/A KONA#R 11 '98 06:32PM P.6  
PER 18 '98 06:12EFT



United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20146

JUN 29 1998

Honorable Stephen K. Yamashiro  
Mayor, County of Hawaii  
25 August Street, Room 215  
Hilo, Hawaii 96720-4252

Dear Mayor Yamashiro:

Thank you for your letter of September 26, 1997, concerning the realignment of Saddle Road on the island of Hawaii. Please accept my apology for the delay in responding.

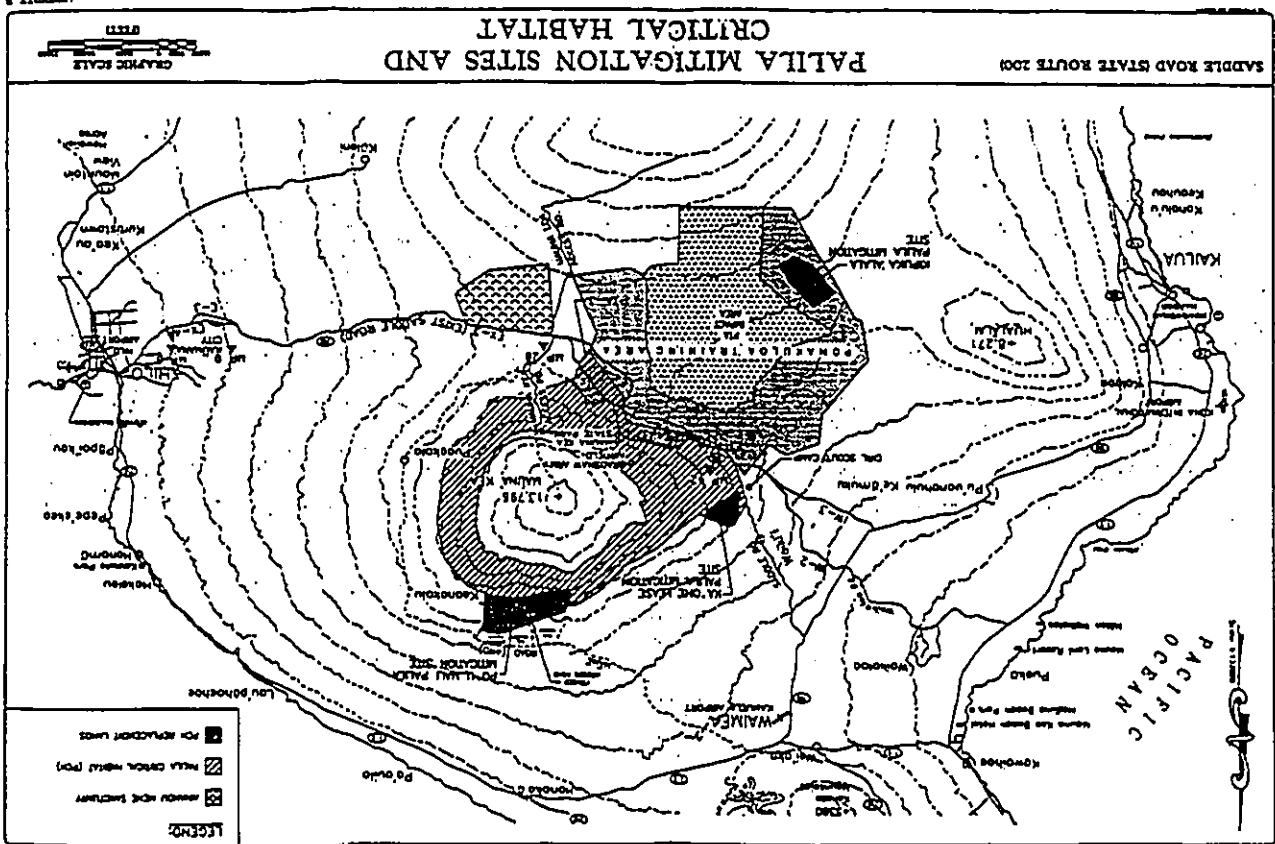
Your letter supported the balanced approach being negotiated in Congress concerning the reauthorization of the Endangered Species Act and returned the need for the same balance with regard to Saddle Road, the construction of which will facilitate military training and commuter travel on the island.

In cooperation with the Hawaii Department of Transportation and the U.S. Department of the Army, the Fish and Wildlife Service's Pacific Islands Office in Honolulu has been working closely with the Federal Highway Administration (FHWA) on the Saddle Road realignment project since the summer of 1994, when planning began. Under the section 7 consultation procedures of the Endangered Species Act, the Service and the FHWA are striving to ensure that the proposed realignment occurs with minimal impact to endangered and threatened species. Early in the consultation process, the FHWA advised the Service that the preferred realignment would go through designated critical habitat for the endangered palila (*Lophortyx chrysurus*) and asked the Service to assist in identifying measures to minimize the effects of the adverse modification. These measures will eventually become part of the Service's formal Biological Opinion under section 7.

At the request of the FHWA and Department of the Army, the Service convened a working group to assess the likely impacts to the survival and recovery of the palila as a result of aligning the road through designated critical habitat. The working group included members of the State of Hawaii's Division of Forestry and Wildlife, the Biological Resources Division of the U.S. Geological Survey, and the Service. The working group's recommendations were reviewed and discussed several times with the FHWA and its consultants and revised until they met with the approval of all parties involved. Subsequently, the Service worked closely with the FHWA and the Army to complete the draft Biological Assessment and preliminary draft Environmental Impact Statement for the project.

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03/11/98 16:27 FAX 1 808 329 1006 OAHARA-KONA Q008  
02/11/98 08:55 8308 881 5529 OAHARA & ASSOC. \*\*\* O/A EMPLOY 11 '98 06:33PTT  
MAR 10 '98 06:23PT P.7

Honorable Stephen K. Yamashiro


2

The formal section 7 consultation process began on October 27, 1997, when the FHA delivered the final Biological Assessment and draft Environmental Impact Statement to the Service. The FHA accepted comments on the draft Environmental Impact Statement until December 22, 1997. Because of the interagency coordination, the Biological Opinion should not include any additional measures for the FHA, and the Service expects to accommodate the requested time-frame for an expedited consultation. It is the responsibility of the FHA, the action agency, to assess the information provided through the Environmental Impact Statement review and the section 7 consultation processes to determine the outcome of the realignment proposal.

We believe that identifying potential impacts to protected species and critical habitat in the Saddle Road project is early in the planning stage and cooperating to minimize these impacts is an example of the successful operation of the Endangered Species Act. The Service has offered guidance and technical assistance in an effort to provide for economic growth while ensuring biological diversity.

We hope that this information is helpful. If you should have further questions or concerns on this matter, we encourage you to contact Mr. Brooks Harper, the Service's Field Supervisor in Honolulu, at 808/541-3441.

Sincerely,

  
Acting Assistant Secretary for Fish and Wildlife and Parks



BEING  
ATTENTION OF

Operations Branch

DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, HONOLULU  
FORT SHAFTER, HAWAII 96859-5440

21 July 1998

Mr. Larry C. Smith, P.E.  
Division Engineer  
Central Federal Lands Highway Division  
Federal Highway Administration  
U.S. Department of Transportation  
P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Smith:

We have completed our review of the 404(b)(1) analysis report for the Saddle Road Project, Mamalaohia Highway, Island of Hawaii. In accordance with the Memorandum of Understanding for the Integration Process for Surface Transportation Projects in the State of Hawaii (ISTEA), the Corps as a signatory agency offers the following comments for your consideration.

1. The Corps concurs on the selection of EX-3, Section III and E-3, Section IV as the least environmentally damaging practicable alternative.
2. While we accept the methodology used to estimate the acreage amount of impact to wetlands, the current wetland map and corresponding wetland information will require supplemental information for the purposes of a complete application for a Department of the Army (DA) permit. Wetland delineations certified by the Corps are valid for 5 years and may be subject to reverification if changes in the area have caused any impacts to the existing wetlands. We will work with your biologist consultant to ensure that an alternative-specific wetland delineation is conducted that meets the standards of the applicable Corps Wetland Delineation Manual.
3. Mitigation will be required only to replace those functions and values identified in the wetlands which have not been avoided or minimized. According to the 404(b)(1) mitigation summary, some mitigative measures have been identified. Additional field visits will be conducted by the Corps to identify and verify the location and types of wetlands found in these areas, therefore, we reserve the right to form an opinion or determine the amount or type of mitigation required to offset the loss.

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03/11/98 06:56 TX/RX NO.1230 P.007



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
PACIFIC ISLANDS Ecoregion  
300 ALA MOANA BOULEVARD, ROOM 3-122  
BOX 50088  
HONOLULU, HAWAII 96850  
PHONE: (808) 541-3441 FAX: (808) 541-3470

In Reply Refer To: 1-2-98-F-01 (kwr) JUL 27 1998

Larry C. Smith, P.E.  
Division Engineer  
U.S. Department of Transportation  
Federal Highways Administration  
Central Federal Lands Highway Division  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Smith:

I am herewith transmitting the Fish and Wildlife Service's (Service) final biological opinion for the proposed Saddle Road realignment and improvement project.

If you have any comments or questions on the biological opinion, please contact me or Assistant Field Supervisor Karen Rosa.

Sincerely,  
*Robert P. Smith*  
Robert P. Smith  
Pacific Islands Manager

Enclosure

cc: Bert McCauley, FHWA-Denver  
Glenn Yasui, FHWA-Honolulu

- 4. For planning purposes and the public interest, the Corps agrees to the design concepts as proposed for the road alignments.
- 5. It is our understanding that funding for Sections III and IV will probably occur within three or five years. Therefore, it would be reasonable for the Corps and other signatory agencies to review supplemental information addressing these sections when funding is available.
- 6. A letter should be sent to our office withdrawing the 1997 DA permit application on file. A DA permit application should be submitted when funding for Sections III and IV become available.

Thank you for the opportunity to comment. If you have any questions, you may call Ms. Lolly Silva at (808) 438-9258, extension 17 or Mr. Farley Watanabe at extension 14.

Sincerely,

*George P. Young*  
George P. Young  
Chief, Operations Branch

Copy Furnished:

U.S. Fish and Wildlife Service, Honolulu, HI  
U.S. Environmental Protection Agency, Honolulu, HI  
State Department of Transportation, Honolulu, HI  
Okahara & Associates, Inc., Kona, HI



U. S. Department of the Interior  
U. S. GEOLOGICAL SURVEY  
BIOLOGICAL RESOURCES DIVISION  
PACIFIC ISLAND ECOSYSTEMS RESEARCH CENTER

Hawaii Field Station  
PO BOX 44, Building 344  
Hawaii National Park, Hawaii 96718  
(808) 967-7396 FAX (808) 967-4568



The road alignment should be modified as necessary to keep it at least 200 meters away from sites containing the listed endangered plant species. Additionally, safeguards should be built into the construction and future maintenance of the new roadway to keep additional alien plant species from becoming established within the road corridor and expanding their distribution into the adjacent areas of native vegetation.

Please contact me if you would like additional information on my comments.

Sincerely,

James D. Jacobi  
Botanist

Mr. Larry C. Smith, P.E., Division Engineer  
Central Federal Lands Highway Division  
Federal Highway Administration  
P.O. Box 25246  
Denver, Colorado 80225-0246

August 7, 1998

Dear Mr. Smith,

I was asked to provide you with my comments on the issue of potential impact of the proposed realignment of the Saddle Road on the island of Hawaii to wetlands found along the road corridors of several of the possible routes. To this end, I have reviewed the botanical sections of the draft Environmental Impact Statement (draft EIS) for this project.

As a preface to my comments, I am a research botanist working on the island of Hawaii with the Biological Resources Division of the U.S. Geological Survey. I have been conducting field research on this island for over 25 years, with project ranging from vegetation mapping to rare plant distribution and status studies and alien plant research. I was the principal investigator of a project to map the vegetation of the island of Hawaii (including a large portion of the area crossed by the Saddle Road) during the 1970's and 1980's with the U.S. Fish and Wildlife Service. My current research program continues to include work in this area.

There are definitely plant communities that qualify as wetlands along the eastern portion of the proposed Saddle Road realignment corridor above Hilo. Sites closer to Hilo are more dominated by introduced grasses, sedges, herbaceous plants, and shrubs. However, the vegetation of the wetland pockets from 3,000 - 5,000 are primarily dominated by native species, most of which are also found as components of adjacent, non-wetland plant communities. As indicated in the draft EIS, several listed endangered native plants (e.g., *Clermontia peleana*, *Cyanea platyphylla*) and a few other non-listed species of concern, are found in some of the sites near the proposed realignment corridor. However, I concur with the conclusion presented in the draft EIS that none of these plants are obligatory wetland species. I further concur that the wetland communities found within this area are local features that do not have a specific large-area function that will be significantly disrupted by site alteration with the road alignment as proposed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Larry Smith, Division Engineer  
Federal Highway Administration  
Central Federal Lands Division  
555 Zang St.  
P.O. Box 25246  
Denver CO 80225-0246

AUG 12 1993

Dear Mr Smith:

EPA has received and reviewed the 404(b)(1) Analysis Report (Report) for Saddle Road according to the Memorandum of Understanding (MOU) entitled, "National Environmental Policy Act and Clean Water Act Section 404, Integration for Surface Transportation Projects in the State of Hawaii".

EPA concurs with the information provided by the Federal Highway Administration concerning the overall project purpose, criteria for alternative selection, the project alternatives, and designation of preliminary preferred alternatives for Sections I, II, and III. We continue to have major concerns about the (1) lack of appropriate mitigation measures for wetlands losses in Sections III and IV and (2) selection of the least environmentally damaging alternative (LEDPA) in Section IV. The following is a summary of how EPA views the issues and a recommendation on what next steps FHWA can consider to remedy the remaining issues.

1. Lack of appropriate mitigation to offset losses to "waters"

Sections III and IV pass through areas that are jurisdictional wetlands, including some types of wetlands whose functions are poorly understood. The Report lacks a conceptual mitigation plan to offset losses to "waters of the United States" and therefore, it would be inappropriate for the EPA to endorse a proposal that would result in a net loss of the reach and extent of the nation's waters.

We agree that it is infeasible to achieve no net loss of the physical extent, functions and values of these wetlands through creation of new habitat. A practical mitigation plan for Saddle Road should include the restoration of degraded habitat or that in combination with preservation of high quality native wetlands ecosystems. We also agree that avoidance and minimization of wetland loss should take into account the preservation of diverse native forest communities (koa-ohia forest).

According to the "Memorandum of Agreement Between the Environmental Protection Agency and the Department of the Army Concerning the Determination of Mitigation Under the

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Clean Water Act Section 404(b)(1) Guidelines (February 1990), "a minimum of 1:1 replacement may be used as a reasonable surrogate for no net loss of functions and values." Taking into account that replacement is impractical and that success of restoration has not been previously demonstrated for this ecosystem, an approvable wetlands mitigation plan for Sections III and IV must include restoration or preservation of an area equal to or greater than the acres lost. It should also include appropriate planting of native species and control of invasive weeds.

2. LEDPA for Section IV.

Federal Highways has asked that EPA endorse its preferred alternative for Section IV as the LEDPA. Three alternative alignments have been seriously considered but we do not believe that FHWA has shown that its preferred alternative is the LEDPA. This preferred alignment, E3, would result in a greater loss of regulated "wetlands" than the other two alignments, and according to this Report (Table 4, p.24), would also be the most costly to construct, even after consideration of the need to purchase several private homes in the right-of-way. Under Clean Water Act regulations, it would be inappropriate to issue a permit for an alternative with the largest impacts, particularly when its costs are more than are associated with less-damaging alternatives.

Elsewhere in the Report (P.17-19) FHA claims that operational costs for EX-4A greatly exceed those for E-3. EPA considers the analysis of operational costs to be unacceptable. While factors such as accident rate, fuel costs, and capital improvements are appropriate to consider, the economic benefit of "time savings" is based on an erroneous assumption that 3 to 5.5 min. savings in travel time daily will be reinvested in the island's economy. Additional costs for the EX-4A alignment were presented in a separate email (Burns, June 18, 1998) and indicate that construction costs for the FHWA preferred alternative would actually be comparable or less costly than the other two alternatives. The additional costs for traffic control, utility relocation, and intersections appear to be real, but are not covered in the Alternatives Analysis Report. We recommend that the FEIS present a complete analysis of construction costs, including mitigation costs, and a revised assessment of operational costs.

Given that Section IV has no funding, would be unlikely to secure such funding in the near future, and that Sections I-III have utility independent of Sections IV, selection of a preferred alternative in the Section IV is premature. The jurisdictional delineation of Saddle Road would expire in 5 years. The Corps would have to revisit that segment of the alignment and prepare a follow-on NEPA document (supplemental EIS or EA) to capture the actual alignment and necessary mitigation at that time. We believe that Section IV should be dropped from discussion at this time. We agree that the alignments on the table now, and perhaps others, will be the alternatives considered in the future, when the LEDPA is ultimately identified for Section IV.

Therefore, we suggest two possible courses of action for FHWA; either 1) select a no build for Section IV, and deal with the segment in a future NEPA document; or, 2) do not select an alternative for that segment at this time and use the FEIS, to explain why there is no selection, and to describe the anticipated course of action once there is momentum (funding etc.) to move

forward on that segment. We believe either course of action would be consistent under NEPA, given that none of the Section I-III alignments would affect the range of alternatives for Section IV.

EPA's January 16, 1998 comments on the Draft Environmental Impact Statement raised a question regarding the extent of regulated "waters of the United States." We wish to clarify that this is not a significant concern for segments I and II. The methods of crossing of the intermittent or ephemeral streams would be the same whether or not the streams were jurisdictional "waters," and the environmental impacts associated with the road crossings are minimal.

As always, you may call me at (415) 744-1584 or David Carlson of my staff at (415) 744-1577 to further discuss NEPA issues or call Dr. Wendy Willse at (808) 541-2752 regarding 404 issues.

Sincerely,

David Farrel, Chief  
Federal Activities Office

cc: M.Deskins, FHWA R9  
D.Palawski, FWS  
L.Silva, USACE



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25746  
Denver, Colorado 80225-0246

**AUG 14 1998**

In Reply Refer To:  
HPD-16/Saddle Road

Ms. Felicia Marcus, Regional Administrator  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Marcus:

In accordance with the "Memorandum of Understanding for the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (MOU), we previously transmitted, by letter of April 29, a copy of the 404(b)(1) Analysis Report (Report) for the proposed Saddle Road Project on the Island of Hawaii. Pursuant to the MOU, we requested concurrence within 45 days on several issues regarding our selected alternative alignment in Sections III and IV of the proposed project.

We are in receipt of Mr. David Farrel's letter of August 12, 1998 and do not consider his evaluation responsive to our requests in light of the facts presented in the Report. We have received responses concurring with our analyses and proposals contained in the Report from the Hawaii Department of Transportation (HDOT), U.S. Army Corps of Engineers (USACE), and the U.S. Fish and Wildlife Service (USFWS). In addition, we have received validation of our wetlands functional interpretation and our selected alternatives' non-significant impact premise from Dr. James Jacobi of the Biological Resources Division, USGS, a recognized botanical expert in Hawaii for over 25 years.

Therefore, we are requesting a meeting at the Region IX office with you and appropriate representatives of the Water Division and the Cross-Media Division to resolve all outstanding issues relating to our 404(b)(1) analysis so that we might proceed with preparation of the Final EIS as scheduled. The issues in question are of paramount concern to the State of Hawaii; therefore, the HDOT may be in attendance at the above meeting as well as the Region 9 and Hawaii Division offices of the FHWA. We would prefer to resolve these issues at the Regional level in the cooperative spirit of the MOU rather than advance the debate to higher levels of dispute resolution as provided in the MOU.

Since this project is of considerable importance to the State of Hawaii and has broad public support, further dispute resolution delays of this nature would be an unacceptable scenario from



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

AUG 31 1998

our standpoint as the lead agency. We are requesting that the above meeting at the Region IX office be scheduled as soon as possible. Please call me at your convenience at (303) 716-2002 to discuss scheduling of the meeting. Thank you for your cooperation.

Sincerely yours,

*Larry C. Smith*  
Larry C. Smith, P.E.  
Division Engineer

Larry Smith, Division Engineer  
Federal Highway Administration  
Central Federal Lands Division  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

cc: Ms. Alexis Strauss, Director, Water Division, EPA Region IX, San Francisco, CA  
Ms. Deanna Wieman, Deputy Director, EPA Region IX, San Francisco, CA  
Maj. Gen. Alexis Lunn (Ret.), Exec. Asst., Office of Senator Daniel K. Inouye, Honolulu, HI  
Mr. Kazu Hayashida, Director, Hawaii D.O.T., Honolulu, HI  
LT COL Ralph H. Graves, District Engineer, U.S. Army Corps of Engineers, Ft. Shafter, HI  
Mr. Jeff Brooks, Deputy Regional Administrator, FHWA, Region 9, San Francisco, CA  
Mr. Abe Wong, Division Administrator, FHWA, Hawaii Division, Honolulu, HI  
Mr. Donald Okahara, Okahara & Associates, Hilo, HI

bc: K. Au  
L. Silva  
G. Yasui  
N. Burns  
D. Gedeon  
R. Cushing  
B. McCauley

yc: reading file  
BMCCAULEY:pc:8/14/98:L:\environment\wphi006\epal\_404.ltr

Dear Mr. Smith:

Thank you for your letter of August 21 to EPA Region 9 Administrator, Felicia Marcus, in which you expressed the desire to meet with her for the purpose of resolving issues surrounding our NEPA/404 non-concurrence on the proposed Saddle Road Project.

Your letter suggests that we "resolve these issues at the Regional level..." and not "...advance the debate to higher levels of dispute resolution." Given the process set forth in the "Memorandum of Understanding for the National Environmental Policy Act (NEPA) and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (MOU), it would be inappropriate to elevate the project to our respective Regional Administrators at this time inasmuch as we believe that "all normal and reasonable options" for resolution have not been exhausted. Subsequent to your telephone conversation with David Farrel of our Federal Activities Office on August 27, it is my understanding that you agree that it would be advantageous for our agencies' respective staff members and first line managers to meet in an effort to resolve the issues in question. We will work with you to schedule such a meeting in the late September time-frame.

In preparation for the meeting, I feel it would be worthwhile to provide you with EPA's historical perspective on the issues. As you know, the NEPA/404 process for this project was not initiated by FHWA until after the Draft Environmental Impact Statement (DEIS) was issued - well past the intended time-frame outlined in the MOU. This has placed both of our agencies in an unfortunate situation that the MOU was intended to allay, namely trying to resolve critical environmental issues within a constraining project-related timeframe driven by project funding. Even so, in our letter of August 13, we concurred with the information provided by FHWA concerning the overall project purpose, criteria for alternative selection, the project alternatives and designation of preliminary preferred alternatives for segments I, II, and III. We do not, however, believe that FHWA's record supports its position that the preferred alternative proposed in segment IV is the Least Damaging Practicable Alternative (LEDPA) pursuant to Section 404 of the Clean Water Act. We are also concerned with the lack of appropriate mitigation for the loss of wetlands in segments III and IV.

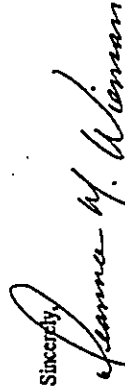


In our August 13 letter we outlined an option which would meet FHWA time-critical needs while advancing the protection of the wetlands ecosystem present in the proposed alignment in segments III and IV. We recommended that NEPA decisionmaking on segments III and IV be postponed until a LEDPA alignment is identified for segment IV, appropriate mitigation commitments for the loss of wetlands are factored into segments III and IV, and funding to complete the project is obtained. This deferral would allow the funded portion of the project to move forward to the FEIS stage. We believe this is a reasonable approach to resolving the current "dispute," especially in light of FHWA's request to defer the actual CWA Section 404 permitting for segments III and IV until funding becomes available. This approach is also supported by the fact that construction on segment IV would not likely take place for years, the current jurisdictional delineation will expire in four years, and a subsequent NEPA document would undoubtedly be required and prepared by the FHWA and/or Corps of Engineers to accommodate Section 404 permit decisionmaking at that time.

As you know, at the conclusion of our review pursuant to Section 309 of the Clean Air Act, EPA rated the DEIS, EO-2, "environmental objections, insufficient information" because of anticipated impacts to wetlands and lack of proposed mitigation. Our EO-2 rating, which could have been more severe, was developed on the basis of informal negotiations which were to have resulted in FHWA taking the "deference" strategy formally proposed above. At this point, it appears that FHWA may not be willing to embrace that strategy. Should the NEPA process go forward without the elements needed to protect, maintain, and preserve native wetland ecosystems, we would re-visit our options to re-rate the EIS. We believe that it would be preferable not to reach that stage in the process, and therefore, unless the unresolved issues we've identified can be fully addressed in this NEPA document, we ask that you reconsider the strategy of deferring decisionmaking on project segments III and IV.

After our agencies meet in September, should the issues remain unresolved and a second-level dispute resolution session is necessary, feel free to contact me at 415-744-1566. Meanwhile, please contact David Farrell at 415-744-1584, or have your staff contact David Carlson at 415-744-1577 to discuss this matter further.

Sincerely,



Deanna M. Wiseman  
Deputy Director  
Cross Media Division



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street, Room 259  
Lakewood, CO 80228

SEP 0 1 1998

In Reply Refer To:  
HPD-16E/Saddle Road

Mr. David Farrell, Chief  
Federal Activities Office  
US Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Dear Mr. Farrell:

This letter is in response to your letter of August 12, which provided the Environmental Protection Agency's (EPA) evaluation of the Federal Highway Administration's (FHWA) 404(b)(1) Analysis Report (Report) for the proposed Saddle Road project. The Report was prepared and submitted to the EPA by letter of April 29 in accordance with the Memorandum of Understanding (MOU) entitled, "National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii". We have reviewed your evaluation comments and are providing the enclosed response entitled "Response to EPA Letter of August 12, 1998".

As a matter of general clarification of statements in the second paragraph of your letter, we assume that the EPA concurs with the entire proposed project's Purpose and Need, the criteria used to evaluate and select alternatives, and the full range of project alternatives in Sections I through IV, which were selected for analysis in the Draft Environmental Impact Statement (DEIS) by the interagency Social, Economic, and Environmental project development team (SEE Team). We also understand that your main objections to the proposed project, with respect to the issues presented in the Report, are: 1.) the selection of alternative E-3 in Section IV as the Least Environmentally Damaging Practicable Alternative (LEDPA) as defined by 40 CFR Part 230 and related guidelines, and 2.) the wetlands impacts and mitigation proposed for the LEDPA in Section IV as well as Section III.

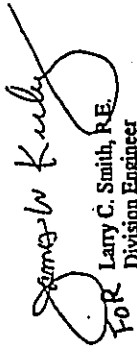
In reviewing the enclosed response, you will find that other MOU signatory agency's opinions and positions are in agreement with the analyses and recommendations presented in the Report. Clearly, EPA seems to hold a dissenting opinion. In the spirit of cooperation of the MOU, we are requesting a meeting with you and your staff, as well as appropriate technical staff persons, to attempt to resolve our differences informally. Should this discussion be unsuccessful, we will request the initiation of formal resolution procedures through the Second-Level Panel pursuant to the MOU.

FEDERAL HIGHWAY ADMINISTRATION  
Central Federal Lands Highway Division  
Saddle Road Project A-AD-6(1)

August 31, 1998

As we discussed, we will target the week of September 21 for the meeting in San Francisco. Please call me at (303) 716-2002 or Bert McCauley at (303) 716-2141 at your earliest convenience to finalize the specific date, time, and place. Thank you for your assistance in progressing this very important project.

Sincerely yours,

  
FOR Larry C. Smith, R.E.  
Division Engineer

Enclosure

cc (w/enclosures):

Ms. Alexis Straus, Director, Water Division, EPA Region IX, San Francisco, CA  
Ms. Deanna Wieman, Deputy Director, EPA Region IX, San Francisco, CA  
Maj. Gen. Alexis Lum (Ret.), Exec. Asst., Office of Senator Daniel K. Inouye, Honolulu, HI  
Mr. Kazu Hayashida, Director, Hawaii DOT, Honolulu, HI  
LT COL Ralph H. Graves, District Engineer, U.S. Army Corps of Engineers, Ft. Shafter, HI  
Mr. Jeff Brooks, Deputy Regional Administrator, FHWA, Region 9, San Francisco, CA  
Mr. Abe Wong, Division Administrator, FHWA, Hawaii Division, Honolulu, HI  
Mr. Donald Okahara, Okahara & Associates, Hilo, HI

bc (w/enclosures):

K. Au, Advance Planning Engineer, Hawaii DOT-Highway Division, Honolulu, HI  
L. Silva, US Army Corps of Engineers, Operations Branch, Ft. Shafter, HI  
G. Yasui, Senior Transportation Engineer, FHWA, Honolulu, HI  
N. Burns, Senior Project Engineer, Okahara & Associates, Kailua-Kona, HI  
D. Gedeon, Project Manager, FHWA, CFLHD, Lakewood, CO  
R. Cushing, Environmental Planning Engineer, FHWA, CFLHD, Lakewood, CO  
B. McCauley, Staff Environmental Engineer, FHWA, CFLHD, Lakewood, CO

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RESPONSE TO EPA LETTER OF AUGUST 12, 1998

The inability to reach agreement on this issue has been frustrated by a lack of involvement on behalf of the EPA in the EIS development. We invited the EPA to become involved in early discussions of wetlands biological analyses and mitigation plans with other similarly concerned agencies, i.e., USACE and USFWS. However, no response was received to a May, 1996 letter to Mr. David Farrel, Office of Federal Activities, EPA Region IX, requesting Cooperating Agency participation on the project and advising of a planned meeting for presentation of impact analyses to all concerned agencies in September, 1996. Invitations to the referenced meeting were delivered by letter in September, 1996 to 30 federal, state, and local agency representatives who had expressed an interest in the project. The meeting was held in October, 1996 and comments and concerns were received thereafter by most participating agencies.

These agency comments resulted in additional studies and document revisions. Subsequently, copies of the Preliminary Draft EIS for final pre-publication, interagency review were distributed in March, 1997 to all concerned agencies except the EPA. Upon learning of the above distribution, Mr. Dave Carlson, of the above EPA office, requested copies of the environmental document which were subsequently delivered. In response to his request, additional information was transmitted to Mr. Carlson in September, 1997. The EPA was also invited to join the interagency Social, Economic, and Environmental project development team (SEE Team) which included the IDOT, USACE, USFWS, Hawaii County, and U.S. Army. Subsequent invitations to SEE Team meetings to discuss alternatives selection, technical analyses, and resulting impacts and mitigation were declined by the EPA.

Publication of the Draft EIS was completed in October, 1997 without EPA comment and distribution was made to EPA at that time. Comments on the Draft EIS were received from the EPA in January, 1998. These comments included admonishment of the FHWA for not specifically following the interagency coordination requirements of the MOU. However, the FHWA believes that adequate opportunity for involvement was provided and that the positive support of other concerned agencies indicates that those who have been closely involved with this project concur in the analyses, recommendations, and direction presented in the 404(b)(1) Report. Given this, the following is our specific response to the August 12 EPA letter.

1. Lack of appropriate mitigation to offset losses to "waters"

First paragraph: "...types of wetlands whose functions are poorly understood."

The jurisdictional wetlands and their functions potentially impacted with the implementation of the project in Sections III and IV are not poorly understood. The Federal Highway Administration (FHWA) enlisted the services of Dr. Grant Gernish, University of Hawaii, a well known botanist with over 20 years of research and investigative field experience in Hawaiian ecosystems, who has aptly defined the extent of wetlands impacted by the Section III and IV alternatives and their associated values and functions (see SECTION 404 RESOURCE IDENTIFICATION, PG. 7, and Appendix A, RESOURCE IDENTIFICATION AND FACTUAL

DETERMINATIONS, pgs. i through xi, 404(b)(1) Analysis Report). In addition, Dr. James Jacobi, Biological Resources Division, USGS, a well known research biologist with over 25 years of field research on the island of Hawaii agrees that these wetland communities "do not have a specific large-area function..." (see attached letter from James D. Jacobi, BRD/USGS). Further, the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), and the Hawaii Department of Transportation (HDOT) have concurred with our analysis in this respect (see attached USACE, USFWS, and HDOT letters). Pursuant to the MOU, we request that EPA furnish factual information supporting this comment by providing a functional assessment of these wetlands.

First paragraph: "The Report lacks a conceptual mitigation plan to offset losses to "waters"...and therefore, it would be inappropriate for EPA to endorse a proposal that would result in a net loss...of the nation's waters".

The Report does provide a conceptual mitigation plan (see General Wetland Mitigation Proposal, EX-3, pg. 13, General Wetland Mitigation Proposal, EX-3, pg. 22, and Appendix A, ACTIONS TO MINIMIZE ADVERSE EFFECTS, pgs. xii through xvii, 404(b)(1) Analysis Report). Furthermore, the HDOT has committed to developing specific location and implementation details of mitigation with final roadway design within the framework of the mitigation principles and elements presented in the Report. The conceptual mitigation plan invests in a "best practice" approach for the total native ecosystem and may result in a replacement ratio higher or lower than 1 to 1. This approach is consistent with the demonstrably low functional values identified for these wetlands and the EPA/Army Memorandum of Agreement Concerning the Determination of Mitigation under the Section 404(b)(1) Guidelines which states, in part, "In most cases a minimum of 1 to 1 acreage replacement of wetlands will be required to achieve no net loss of values...the ratio may be less than 1 to 1 for areas where the functional values associated with the area being impacted are demonstrably low...."

Second paragraph: "A practical mitigation plan...should include the restoration of degraded habitat or (restoration) in combination with preservation of high quality native wetlands ecosystems. We also agree that...wetland loss should take into account the preservation of diverse native forests..."

As stated in the Report, the FHWA is proposing to restore agriculturally degraded wetland areas within the Right-of-Way (ROW) and within any uneconomic remnants of ROW that are required to be purchased. Additionally, areas occupied by the existing roadway which will be abandoned and other disturbed areas within the ROW, are to be reclaimed and restoration of native biological communities encouraged without regard to wetlands specifically, but with an emphasis on endemic species and ecosystems. This is considered a "best practice" approach by Dr. Gerrish and gives equal weight to more valuable upland communities consistent with USFWS Pacific ecosystem policies. Further, the FHWA cannot support, from a public expenditure perspective, the preservation of high quality native wetlands in a pre-determined compensatory ratio, to replace interspersed wetland pockets of demonstrably low functional value. The preservation approach is not a responsible scientific solution when much more can be accomplished by recognizing the unique wetland/upland mosaic for what it is, i.e., a naturally integrated biological system that should be encouraged to propagate wherever possible. It is the FHWA's scientifically supportable position, that the impact to this ecosystem should be mitigated, within reasonable limits

based upon demonstrated functional values, using unique and system-specific solutions and not within the framework of a rigid mainland wetlands model which does not apply in this case.

Third paragraph: "(referencing the EPA/Army MOA on 404(b)(1)), a minimum of 1:1 replacement may be used as a reasonable surrogate for no net loss of functions and values. Taking into account that replacement is impractical and that success of restoration has not been previously demonstrated for this ecosystem, an approvable wetlands mitigation plan for Sections III and IV must include restoration or preservation of an area equal to or greater than the acres lost."

We are unable to find the referenced statement from the MOA. Our copy of the referenced MOA makes this statement in different wording, but also recognizes that replacement is directly tied to functional values and that if these values are demonstrably low, the replacement ratio may be less than 1:1. The Report clearly demonstrates that the functional values of these wetlands are marginal when viewed independent of the interspersed uplands and in the context of the factual determinations required by 404(b)(1), Subpart B, para. 230.11 (see Appendix A, RESOURCE IDENTIFICATION AND FACTUAL DETERMINATIONS, pg. i, 404(b)(1) Analysis Report).

Additionally, evidence of the potential success of restoration in Section IV can be seen in locations which have been previously disturbed and were naturally reclaimed by native vegetation in place of alien species. This primarily occurs because the lack of soil and harsh climate in lava fields is conducive to naturally adaptive species and detrimental to alien ones. We believe with specific management practices, this process will be enhanced and will have a very high probability of success.

We are unsure what is meant by an "approvable wetlands mitigation plan must include...an area equal to or greater than the acres lost." This statement seems to refer to a specific location set aside and documented in the Final EIS. If so, it implies rejection of our proposal to provide specific mitigation at a later date within the framework of the mitigation elements presented in the Report. As we have discussed with the EPA's staff on several occasions, designation of specific restoration or preservation areas and providing a commitment to these areas is impossible at this point in time, given the constraints of the Defense Access Road Program funding and the unavailability of HDOT funding for these Sections. Further, it is FHWA's opinion, notwithstanding our position on preservation and ratio-based restoration previously enumerated, that setting aside specific areas now does not take into consideration that future environmental resource distributions and knowledge, as well as permitting procedures may necessitate a completely different approach to designation of a specific area for restoration. We are of the opinion that our proposal allows for this possibility through a commitment by HDOT to re-evaluate this Section(s) within the 404 permitting process and within the context of conceptual mitigation elements presented in the Report when advancement of these projects is eminent and funded. To designate a specific area(s) now is environmentally insensitive and not responsive to good stewardship in a continually evolving ecosystem such as the one in question.

Given the above discussion and the fact that the 404 permit will require review, updating and re-issuance in 5 years irrespective of our commitments, we requested in the Report a variance to the procedures in the Section 404 Integration MOU to allow for permitting for

Sections III and IV pending advancement of these projects and under the conditions and commitments previously described. We need a specific decision on this issue from the EPA in order to prepare a modification of the MOU for signature by the affected parties.

## 2. LEDPA for Section IV.

Final paragraph: "...we do not believe that FHWA has shown that its preferred alternative is the LEDPA."

The FHWA is of the opinion that we have fully and clearly demonstrated, in light of the marginal value of the wetlands impacted by alternative E-3, that other alternatives, including additional reduced designs evaluated at the request of EPA, have overbearing social, economic, and environmental impacts rendering them less desirable from a balanced assessment viewpoint (see Alternatives Analysis Discussion: EX-4A and E-3, pgs. 17 through 22 and Table 4, SECTION IV COMPARISON OF LEVEL OF IMPACTS, pgs. 24 and 25, 404(b)(1) Analysis Report). The FHWA, as required by FHWA's Federal-Aid Policy Guide, Section 771.105 (23 CFR 771), must evaluate alternative courses of action "in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, State, and local environmental protection goals." We believe that we have made a balanced assessment in the best overall public interest in selecting E-3 and that to make this decision on the basis of wetland "take" alone, as the EPA suggests, would be irresponsible. Pursuant to the MOU, Section VI. C., we request that the EPA provide an explanation of the basis for nonconcurrence with the LEDPA.

Second paragraph: "EPA considers the analysis of operational costs to be unacceptable. While...accident rate, fuel costs,... are acceptable to consider, the economic benefit of "time savings" is based on an erroneous assumption that...savings in travel time daily will be reinvested in the island's economy."

We are unclear about EPA's initial statement in this instance in that the second sentence states that two components of operational costs; i.e., accident rate and fuel costs, apparently are considered acceptable. As presented in the AASHTO Manual on User Benefit Analysis, travel time savings and their impact on community economic factors has been a widely researched and documented transportation systems analytical tool since the 1960's. When coupled with a community specific economic input/output model (State of Hawaii, DBEDT, 1989, ref. PB-3-76 Draft EIS), the analysis is a very legitimate means of determining potential economic benefits from travel time savings. The concept is a very simple one and is based upon the fact that, if less time is spent en route between home and employment, engaged in supplies and material delivery, or between interdependent business functions, the time saved is directly proportional, with appropriate adjustments, to higher production rates, more efficient business operations, and greater profit margins; thus enabling business expansion, increases in employment, and more disposable income in circulation.

The operational analysis as presented in the Report is an extremely conservative analysis; i.e., current (1998) or construction year (2006) operational costs were not computed from a stream of costs throughout the 20 year design life beginning at the assumed completion of the project in 2007. They were computed only for the design year (2018) and reduced to

present worth costs. Further, attention should not be focused solely on the magnitude of benefits or disbenefits when comparing alternatives, but also on the differences between the two alternatives. This is to say, all other variables being equal, minor differences in the value of the time are inconsequential in a comparative analysis as long as the same value is used in computations for each alternative or only the difference in travel times is considered.

When considering a transportation investment of the magnitude of the Saddle Road Project, it is imperative that the FHWA examine the long-term economic consequences of our decisions. Such an examination must include all reasonable costs which, over time, can result in substantial net benefits or disbenefits to the public.

Second paragraph: "Additional costs for the EX-4A alignment were presented in a separate email (Burns, June 18, 1998)...additional costs...appear to be real, but are not covered in the Alternatives Analysis Report. We recommend that the FEIS present a complete analysis of construction costs, including mitigation costs, and a revised assessment of operational costs."

We have been in the process of refining our analyses for the Final EIS and furnished the referenced additional costs in the E-mail consistent with the agency commitments referenced in the MOU for Pipeline Projects. Cost estimates transmitted outside of the Report, pursuant to EPA's request, have been documented as to their basis and assumptions and are being transmitted herewith in a revised Table 4 to the Report. With respect to the revised construction costs in Table 4, it should be noted that the construction of E-3 would reduce the required length of the Puainako Street Extension by approximately 1 kilometer, thus saving the State of Hawaii approximately \$3.0 Million in construction costs. Since the Puainako project has been identified as a "significant deficiency" for the Hilo Circulation Area in the State Transportation Plan, thus scheduled for eventual construction, these cost savings are benefits to the citizens of Hawaii that can be attributed to the selection of E-3.

The FEIS will contain a complete alternatives analysis, including the assessment of operational costs as contained in the current Report and the revised construction costs contained in the enclosed Table 4. This alternatives analysis will unquestionably support our decision to select E-3 as the preferred alternative when viewed from a balanced perspective.

Third paragraph: "We believe that Section IV should be dropped from discussion at this time. We agree that the alignments on the table now, and perhaps others will be the alternatives considered in the future..."

This is not an acceptable decision for FHWA at this time. Given that; 1) alternative corridors meeting the definition of "practicable" in Section IV are limited due to physical, social, and environmental constraints, 2) all reasonable and practicable alternatives have been exhaustively evaluated at this time, 3) sufficient information and adequate analyses have been developed to date on those alternatives, and 4) the possibility of near-future funding for this Section is not out of the question, we believe that it is reasonable and responsible to select a preferred alternative in Section IV at this time. This is a particularly cogent argument in the context of our complete proposal; i.e., HDOF's future commitment to evaluate the selected alternative for minor alignment adjustments, ensure absolute minimization of wetland impacts, and develop site specific mitigation during a re-evaluation of the Section at the time of application for 404 permitting. At this point in time, we are

TABLE 4  
SECTION IV COMPARISON OF LEVEL OF IMPACTS  
Revised August 25, 1998

Affected Environment	Alternative E-3	Alternative EX-4A
Wetlands	3.2 Hectares (8.0 Acres). 84% is interspersed disturbed Ohia forest and degraded agricultural wetland.	0.4 Hectares (1.0 Acre). Entire wetland area is native habitat.
Native Habitat Adjacent Reach	2.15 km (1.3 miles)	4.18 km (2.6 mi). More than 50% is within existing roadway area.
Farmland	Loss of 8.8 hectares of prime farmland.	No direct loss of farmland.
Historic Sites	3 sites, all impacts can be mitigated	1 site, impact can be mitigated
Socioeconomic Impacts	Greater mitigation costs; lower operating costs.	More than \$10M/yr in design year disbenefits (2006 dollars) vs. E-3.
Construction Cost (incl. ROW, mitigation)	\$18,000,000	\$20,000,000 <sup>1</sup>
Cost to Punaako Project	\$0	\$3,000,000
Relocations	None	11 - 28 homes <sup>2</sup>
Social Impacts	Reduction in traffic through Kaunana. Increased community cohesion, bicycle and pedestrian opportunities, social interaction, and property values.	Construction related impacts to Kaunana. Increased traffic volumes and truck traffic, noise, air pollution, and community disruption.
Visual Impacts	No visual impact to Kaunana.	Unacceptable impact to Kaunana.
Noise	Does not exceed or approach NAC. Substantial increase at 14 receptors.	Exceeds or approaches NAC at 29 receptors, substantial increase at 18 receptors, abatement not feasible.
Safety	No movement of military material through residential areas, safer access to Kaunana Drive, less accidents, increased pedestrian safety, local traffic only.	Reduced capacity contributes to higher accident rate, restricted local access and unacceptable queues created by military convoys; decreased pedestrian safety.
Operational Function and Quality of Traffic Flow	Controlled access and land use; i.e., intersections strategically planned & designed to enhance traffic flow.	Traffic flow impeded because of numerous driveways and approach roads which must be maintained.
Accommodate Present and Future Traffic Levels.	Design can be upgraded to provide additional travel or access lanes, geometrics not constrained; i.e., higher design standards possible.	Future widening may cause relocation of residences and roadway geometric and intersection improvements constrained by development.

<sup>1</sup> Actual costs will vary depending on number of homes or unacceptably remaining property taken, final utility relocations, and number of intersections and locations. See attached *Discussion of Revised EX-4A Construction Costs*.

<sup>2</sup> Actual number of relocations will vary depending on final intersection designs, lot zoning requirements at time of ROW purchase, and property owner compensatory costs.

certain that an objective future analysis would bear out the fact that the E-3 corridor, located on young lava flows and through an agriculturally degraded wetland area, has the least amount of impact on high quality environmental resources, socioeconomic concerns, and physical human environment concerns when viewed from a balanced perspective. It is only a matter of refining the alignment within that corridor to provide the absolute minimization of low value wetland impacts. Further, if selection of an alternative is delayed in this Section, the impacts to Kaunana from an alternative along the existing alignment can only increase as the community grows. Also, if the E-3 alignment is selected now, a corridor can be administratively "zoned" to preempt development. In view of all of these facts, we strongly believe that E-3 is the LEDPA.

Fourth paragraph: "...we suggest two...courses of action for FHWA, either 1) select a no build for Section IV...; or, 2) do not select an alternative for that segment..."

To select the "No-Build Alternative" in Section IV would ignore the project's purpose and need as well as public safety and impacts to the residents of Kaunana. It has been shown in the Report that any alternative of lesser design in this Section, including the No-Build Alternative, is not a practicable one in light of the purpose of, and the need for, the proposed project. Our analysis supports the position that the No-Build Alternative is not a reasonable and prudent alternative and therefore, an unacceptable selection for FHWA and HDOT.

To not select an alternative in Section IV in the FEIS is a possible solution; however, this would represent a denial that our information and analyses are adequate to select an alternative at this time. As discussed previously, we believe there is currently sufficient information on which to base a decision for E-3 as the preferred alternative. Further, HDOT, a co-sponsor of this document, agrees with this position and does not wish to be a party to the precedent that a denial of that magnitude would entail. It would represent an admission that all future projects in this type of terrain would be subject to scrutiny beyond reasonable scientific and engineering inquiry. It would also commit HDOT to unjustified future project development costs and delays associated with advancing a project in Section IV through the entire NEPA process.

#### DISCUSSION OF REVISED EX-4A CONSTRUCTION COSTS

As stated in the June 18, 1998 E-mail (Burns to Silva), construction costs for the EX-4A alignment presented in the DEIS were general costs based on planning level design. The original cost estimate did not account for channelized and/or signalized intersections which may be required for the 4 existing intersecting streets located along the alignment. Estimates for a channelized intersection range from \$100,000 to \$500,000, depending on signalization requirements. It is assumed that the cost of EX-4A will increase \$2,000,000 for construction of 4 signalized intersections. There are a total of 6 possible intersections, including two intersections required to tie the existing Saddle Road to the proposed alignment at either end of the HELCO easement to provide local access to the by-passed segment of existing Saddle Road.

The aforementioned E-mail also stated that the extent of, and cost for, utility relocations and adjustments, traffic control, and increased labor intensive excavation along the existing road are unknown but would add, conservatively, \$2,000,000 to overall project costs. In the interest of clarity, the basis of this estimate is as follows:

- ▶ Many of the power poles along the existing alignment are 138 kv lines. The cost to relocate the 138 kv poles is estimated to be approximately \$40,000 each. The exact number of pole relocations will be determined during final design but it is estimated that 15 poles may need to be relocated. Additional costs for these relocations could thus be in excess of \$500,000.
- ▶ Approximately 3,000 feet of water line is located in the existing road. Costs for this relocation range from \$60,000 to \$100,000 or more. It is likely that a water supply booster pump station will also require relocation at a cost of approximately \$200,000. Total cost for these relocations could be in excess of \$300,000.
- ▶ Costs for traffic control within a constricted ROW while maintaining existing traffic averages 5% to 8% of total construction costs. A reasonable estimate for traffic control to construct EX-4A is \$1,000,000.
- ▶ Unit costs for excavation within existing ROW are 100% higher than in open terrain because of constraints on equipment size and use and the labor intensive nature of the operation. These costs for EX-4A are estimated at approximately \$500,000.

In addition, the residential relocations presented in the DEIS included only those homes for which it could be definitely determined that "lake" impacts would occur. There are up to 17 additional homes and numerous undeveloped lots or tracts which may also require purchase as the lot size would be reduced below the minimum specified by zoning regulations. While it is probable that Hawaii County would allow variances for some of these homes and/or properties, compensation to the owners would be required. Further, it is also likely that some of the homes and/or properties would require purchase because of overbearing damages to the gainful use or enjoyment of the property. Compensation for these properties could range from \$500,000 to

\$2,000,000. An estimate at the lower end of this range, say \$500,000, is very reasonable at this point in project development.

When considering benefits of selecting the E-3 alignment, cost savings realized by shortening of the Puainako Street Extension project should also be acknowledged. With the construction of E-3, the Puainako Street Extension will be shortened by approximately 1 km resulting in a cost savings of \$3,000,000 for that project. Since the Puainako Street project has been identified as a "significant deficiency" for the Hilo Circulation Area in the approved State Transportation Plan and thus scheduled for eventual construction, these cost savings are real net benefits that can be attributed to the selection of E-3 because they will be realized as a cost reduction for the complete cross-island commuter facility from Hilo to Kona. These costs should be considered directly in a cost comparison of EX-4A to E-3 because they can be viewed as a secondary impact resulting in a commitment to higher future transportation system costs to the State for the total cross-island commuter facility should EX-4A, or any variation thereof, be selected.

In summary, the total cost for the EX-4A alignment is somewhat more difficult to estimate than the E-3 alignment because of factors that will become more lucid during final design, such as final intersection designs, actual property takes, and actual utility adjustments and relocations. The cost presented in the Draft EIS assumed minimal costs for these items based upon a 10% to 15% complete design planning level analysis. Given the more detailed examination of costs, as discussed previously, it is not unreasonable to revise the previous EX-4A cost estimate upwards by \$5,000,000. Simultaneously, the cost estimate for E-3 does not change because of the absence of the above additional costs along that alignment.

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US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street, Room 259  
Lakewood, CO 80226-1103

*File Copy*

SEP 17 1998

In Reply Refer To:  
HPD-16E/Saddle Road

Mr. Michael D. Wilson  
State Historic Preservation Officer  
Department of Land and Natural Resources  
State Historic Preservation Division  
33 South King Street, 6th Floor  
Honolulu, HI 96813

Dear Mr. Wilson:

In accordance with Mr. Don Hibbard's letter of November 14, 1997 requesting additional ethnographic studies for the proposed Saddle Road Project, we are submitting under separate cover, a *Supplemental Traditional Cultural Property (TCP) Assessment* to the final report entitled *Archaeological, Historical, and Traditional Cultural Property Assessment for the Hawaii Defense Access Road A-AD-6(I) and Saddle Road (SR 200) Project*. Interviews were conducted and the supplement was prepared by Dr. Charles Langlas of the University of Hawaii-Hilo under contract to the Federal Highway Administration (FHWA) and we are in full agreement with the findings, recommendations, and conclusions presented therein. In this regard, we are enclosing a letter from Mr. Stanley Roehrig, Regent, University of Hawaii, agreeing with our position that it is the responsibility of the University of Hawaii to manage the archaeological and cultural resources within the summit area of Mauna Kea.

In March of this year, we attended a meeting with Mr. Hibbard and Mr. Gil Coloma-Agaran to present our findings as of that date and discuss procedures for submittal and review of the final TCP supplement. A copy of the minutes of that meeting are enclosed for your review. In March, we also met with Ms. Holly McEldowney to review our progress on revision of the final archaeological and historical report, discuss submittal time frames, and to receive guidance on the development of a Memorandum Of Agreement (MOA). At the meeting with Ms. McEldowney, it was agreed that we could submit the revised final report as soon as possible, while continuing to work on the TCP studies, and submitting these findings in a supplemental TCP report at a later date. A copy of the minutes of this meeting are also enclosed for your review.

Also at the March meeting with Ms. McEldowney, it was agreed that we could continue to work on the MOA while the final report was being reviewed, submitting the MOA to your office for comments in May. We now understand that you will reserve comment on the MOA until a determination is made on the supplemental TCP information. Since we are concerned about

meeting our schedule for completion of the Final EIS which must contain the MOA, we are requesting that: 1) the SHPO provide a review of the Supplemental TCP Assessment within 2 to 3 weeks of its receipt, and 2) the SHPO provide comments on the enclosed draft MOA within 30 days. We believe that this expedited review can easily be accomplished since these issues have been under discussion with your staff for an extended period of time.

It is our understanding that Dr. Langlas has been in close contact with your office in the development of the Supplemental TCP Assessment. Given that we will need to pass the MOA through the Office of Hawaiian Affairs and our need to progress the project in as timely a manner as possible, should we not receive a response from the State Historic Preservation Officer within 30 days of the receipt of the Supplemental TCP Assessment and the draft MOA, we will assume implicit concurrence with our recommendations and conclusions and complete the Section 106 process in consultation with the Advisory Council on Historic Preservation, as directed by 36 CFR Part 800: Subpart A, Para. 800.1 (c)(1)(ii).

A representative of our consultant team will hand deliver the Supplemental TCP Assessment and will be available to briefly review the main points of the assessment with those who will be involved in the review and evaluation. Appropriate members of your staff will be contacted to make such arrangements.

Should you have any questions regarding this, or any previous submittal, please contact Mr. Bert McCauley, Environmental Project Engineer, at (303) 716-2141. Thank you for your cooperation in assisting us with a timely delivery of this project.

Sincerely yours,

*James W. Kuley*  
Larry C. Smith, P.E.  
Division Engineer

Enclosures

cc (w/enclosures):

Ms. Mary Ann Naber, Historic Preservation Specialist, Advisory Council on Historic Preservation, 1100 Pennsylvania Ave., NW, Suite 809, Washington, DC 20004  
Gen. Alexis Lum, Executive Assistant, Office of Senator Daniel K. Inouye, 300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850  
Mr. Kenneth Au, Advance Planning Engineer, Hawaii DOT, 600 Kapiolani Boulevard, No. 301, Honolulu, HI 96813  
Mr. Merrill Deskins, Environmental Specialist, FHWA, Region 9, 201 Mission Street, Suite 2100, San Francisco, CA 94105

cc (w/o enclosures):  
Mr. Abraham Wong, Division Administrator, FHWA, HI Division, Prince Jonah Kūiū  
Kalanianoʻole Federal Bldg., 300 Ala Moana Blvd., Rm. 3202, Honolulu, HI 96850  
Mr. Tom Wolforth, Projects Manager, Paul H. Rosenthal, Inc., 204 Waiānuenu Avenue,  
Hilo, HI 96720  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Assoc., 73-5574 Maiau Street,  
Bay 6B, Kailua-Kona, HI 96740

*Draft*

MEMORANDUM OF AGREEMENT  
Among the  
ADVISORY COUNCIL ON HISTORIC PRESERVATION (ACHP)  
FEDERAL HIGHWAY ADMINISTRATION (FHWA) and  
HAWAII STATE HISTORIC PRESERVATION OFFICER (SHPO)  
Regarding the Saddle Road (SR 200) and  
Hawaii's Defense Access Road (A-AD-5-1) Improvement Project on the  
Island of Hawaii, Hawaii

**DRAFT**

**DRAFT**

WHEREAS, the Federal Highway Administration (FHWA) has determined that the proposed Saddle Road (SR 200) Improvement Project from Kaunua (at Milepost 6 on Saddle Road) to the intersection of Saddle Road with the Māmaloa Highway will have an effect on 19 historic properties eligible for listing on the National Register of Historic Places (NRHP), and have consulted with the Hawaii State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR and Part 800 regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 4700); and

WHEREAS, the State of Hawaii's Department of Transportation (HDOT) and the Office of Hawaiian Affairs (OHA) has been consulted in preparation of this Memorandum of Agreement (MOA), and concur with the stipulations contained herein;

NOW, THEREFORE, ACHP, FHWA, and SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

STIPULATIONS

1. FHWA shall develop and implement an archaeological data recovery plan that is consistent with the Secretary of the Interior's Standard and Guidelines for Archaeological Documentation (48 CFR 44714-37) and takes into account the Council publication, Treatment of Archaeological Properties, and the SHPO minimal standards for archaeological data recovery. The data recovery plan will:
  - Identify sites that require data recovery (see Attachment 1).
  - Present research context and questions to be addressed during data recovery, with an explanation of their relevance and importance.
  - Specify methods to be used, with reference to their relevance to the research questions.
  - Itemize contents of the report on the data recovery effort.
  - Indicate review procedures to be followed.
  - Provide a report completion date.
  - Establish how the results will be distributed, and
  - Give proposed methods by which native Hawaiian groups will be notified when the work is beginning and how they will be provided with a summary of the report findings.

FHWA shall submit the data recovery plan to the SHPO for a 30 day approval review period. Unless the SHPO has specific objections to procedures, methods, and treatments outlined in the plan within 30 days after receipt and submits these objections in writing, the FHWA may assume SHPO concurrence and implement as proposed. If SHPO objects to the plan within 30 days of receiving the data recovery plan, it shall be revised as applicable and submitted for another 30 day approval review period.

**DRAFT**

**DRAFT**



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ATTACHMENT I

SIHP #	Description	Site Name	Mitigation
20852	Historic burial		Preserve; avoid
20854	Historic ranching		Data recovery
20855	Historic transportation	Waikea to Kona road	Data recovery
5002	Historic ranching	Ka'ohu wall	None
5003	Prehistoric temporary habitation		Preserve; avoid
14638	Prehistoric temporary habitation		Preserve; avoid
20862	Historic ranching		None
20865	Historic ranching		None
20877	Historic ranching		None
21150	Historic transportation	Hinu'u'a wagon road	Data recovery, Interpretation
7119	Historic ranching	Hinu'u'a wall	Interpretation, monitor periodically
10309	Historic transportation	Puu 'O'o Trail	Data recovery, Interpretation
20836	Historic paving		None
20878	Historic transportation	Hilo Puu 'O'o Trail	Monitor periodically
20864	Historic transportation	Saddle Road	Interpretation
20869	Historic survey marker		None
20870	Historic agriculture	Obi's Flame	Interpretation
20872	Historic recreation	Hilo Country Club	None
20873	Historic habitation		None
	Mauna Kea TCP		Preserve; avoid

DRAFT

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2. FHWA shall ensure that all archaeological materials and records are curated by an institution acceptable to the SHPO in accordance with 36 CFR Part 79.

3. FHWA shall develop and implement a treatment plan for the preservation and interpretation of designated sites (Attachment I). In most instances, preservation will be achieved through avoidance of the sites. In one instance, Site 10309, efforts will be made to redesign the proposed construction corridor to minimize impact to the site, a trail. Portions of the trail site that cannot be avoided during construction will be included within the data recovery activity, and incorporated into the data recovery plan outline above.

FHWA shall submit the treatment plan to the SHPO for a 30 day approval review period. Unless the SHPO has specific objections to procedures, methods, and treatments outlined in the plan within 30 days after receipt and submits these objections in writing, the FHWA may assume SHPO concurrence and implement as proposed. If SHPO objects to the plan within 30 days of receiving the data recovery plan, it shall be revised and submitted for another 30 day approval review period.

4. All parties to this MOA agree that Mauna Kea and two sites located on Mauna Kea as described in the Traditional Cultural Properties Addendum to the Saddle Road Corridor: An Archaeological, Historical, and Traditional Cultural Property Inventory Survey, Evaluation and Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project are eligible for the NRHP as Traditional Cultural Properties (TCP). All parties further agree that the effects of the Saddle Road Project on these properties are negligible, uncertain, and indeterminate, and that their eligibility, effects upon, and related mitigation are more properly considered within the Area of Potential Effect of actions being planned by the State of Hawaii concerning the development and management of and access to facilities on Mauna Kea.

5. Should any party to this agreement object to the proposed data recovery or treatment plans within the 30 day approval review period pursuant to this agreement, the FHWA shall consult with the objecting party to resolve the objection. If the FHWA determines that the objection cannot be resolved, the FHWA shall forward all pertinent documentation, the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:

- Provide the FHWA with recommendations to be considered in reaching a final decision regarding the dispute, or
- Notify the FHWA that it will comment pursuant to 36 CFR 800.6(b), and proceed to comment. Any Council comment provided in response to such a request will be considered by the FHWA in accordance with the 36 CFR 800.6(c)(2) with reference to the subject of the response.

Any recommendations or comments provided by the Council will be understood to pertain to the subject of the dispute; however, the FHWA's responsibility to carry out all actions under this agreement that are not subject to dispute will remain unchanged.

6. Any party to this MOA may request that it be amended, where upon the parties will consult in accordance with 36 CFR 800 to consider such amendment.

Execution of the MOA and the implementation of its terms evidence that the FHWA afforded the Council an opportunity to comment on the Saddle Road (SR 200) Improvement Project and its effects on historic properties, and that the FHWA has taken into account the effects of the undertaking on historic properties.

DRAFT

DRAFT

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL HIGHWAY ADMINISTRATION			
INSPECTION REPORT			
REGION NO. 16	REPORT OR Meeting with SHPO, Hawaii Defense Access Road A-AD-4(1)	DIVISION: CELLID	
DATE OF INSPECTION March 12, 1998	INSPECTION MADE BY: Okahara & Associates, Inc. Nancy E. Burns, P. E.	PROJECT NO.:	HIA-AD-4(1)
IN COMPANY WITH: SEE BELOW			

REMARKS: A meeting was held on March 12, 1998 at the State Historic Preservation Office (SHPO)

to discuss the Saddle Road project.

The attendees were:

Holly McEidowney	SHPO
Glenn Yasui	FHWA-Honolulu
Bert McCauley	FHWA-Denver
Kenneth Au	HDOT
Donald Okahara	Okahara & Associates, Inc.
Nancy Burns	Okahara & Associates, Inc.
Tom Wolforth	PHRI

Bert reviewed the schedule. The Final EIS is to be released September 1998 and the Record of Decision (ROD) is expected to be signed December 1998. Memorandums of Agreement (MOA'S) must be signed which include proposed mitigation for archeological sites. The MOA's can be simple but must include commitments such as "construction plans will be submitted to SHPO for review."

The final report for the EIS must be detailed, however mitigation stipulations in the MOA can be less detailed with the specifics to be worked out later. Holly will send samples of MOA's from other projects.

Ken Au will provide the Queen Kaahumanu Highway widening MOA. The revised historic and cultural inventory report can be submitted as soon as it is complete. The MOA should reference data recovery, research, and design concepts. SHPO may require modifications to portions of trails that already exist and that are in good condition. Documentation, such as photographs of good portions of trails not impacted may be required. These areas may be outside the APE. FHWA and HDOT do not have any reservations about documenting areas outside the APE.

Burial sites must be avoided and mitigated with walls or fencing. A construction specification will be required which mandates workers remain within specified construction limits.

Holly's last day with SHPO is June 30. Holly recommended that the revised report be submitted soon in order to give her ample time to review and sign off on the adequacy of the report. The TCP addendum concerning Mauna Kea can be submitted at a later date while work is proceeding on firming up agreement on historic site effects and mitigation. The MOA can also be prepared while the revised report is being reviewed.

The draft MOA is scheduled to be submitted May 1, 1998. Holly recommended that native Hawaiian groups be contacted so that they have an opportunity to review and provide input to the MOA. Kenneth Au agreed to contact the Office of Hawaiian Affairs (OHA). Holly recommended that Chuck contact groups and individuals and document his discussions to show a good faith effort was made to gather input.

Holly requested a copy of the confidential interviews from Volume 5 of the DEIS Technical Appendix. Nancy will check to see that OHA got the full package of the DEIS and Appendices. A presentation to OHA is recommended before finalizing the MOA. Detailed design plans are not required for the MOA.

These notes constitute our understanding of the items discussed during the meeting. If there is an error or if your understanding should differ, please call Nancy Burns at 329-1221.

Submitted by,  
OKAHARA & ASSOCIATES, INC.

*Nancy E. Burns*

Nancy E. Burns, P. E.

cc: Alterdees  
Bill Kikuchi, Office of Senator Daniel Inouye  
Alexis Lum, Office of Senator Daniel Inouye  
Wayne Tanaka, Office of Senator Daniel Inouye

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL HIGHWAY ADMINISTRATION			
INSPECTION REPORT			
REGION NO. 16	REPORT ON: DLNR Meeting Hawaii Defense Access Road A-AD-5(1)	DIVISION: CFHD	PROJECT NO.: HI A-AD-4(1)
DATE OF INSPECTION: March 19, 1998	INSPECTION MADE BY: PHRI Tom Wolfarth, M. S.		
IN COMPANY WITH: SEE BELOW			

REMARKS:

A meeting was held on March 19, 1998 at the Honolulu DLNR office. The purpose of the meeting was to discuss results of additional TCP investigations with DLNR. The attendees were:

G. Agaran	DLNR
D. Hibbard	DLNR
C. Langlas	UHH
R. Terry	Geo Melrician
R. David	RANA Productions, Ltd.
B. McCauley	FHWA-Denver
B. Moore	Okahara & Associates, Inc.
K. Au	HDOT
T. Wolfarth	PHRI

B. McCauley began the meeting by providing a synopsis of activities that have led up to this meeting, including previous report submittal timeline, and the substance of a previous meeting with D. Hibbard. C. Langlas provided a relatively in-depth presentation of the results of his additional investigations into the mamane forest issue. While acknowledging the respect and reverence that native Hawaiians have for natural resources, C. Langlas concluded that the mamane forest is not a TCP. As the discussion moved to Mauna Kea, G. Agaran expressed surprise that Mauna Kea was even being considered, mentioning to D. Hibbard that he thought Mike said we weren't going to do that. D. Hibbard said we had to, without explanation. B. McCauley articulated the reasons why the Saddle Road team was doing additional investigations concerning Mauna Kea, and produced a copy of the November, 1998 DLNR letter stating so for G. Agaran to read.

C. Langlas related the results of his additional investigations into the Mauna Kea issue. He concluded that Mauna Kea can be considered a TCP. He specified several areas of significance: Lake Waiau, the several puus around the summit, and the summit itself. He also mentioned that the Kanahaes thought the all of the area above habitation was considered sacred. This led to a discussion of where to draw the boundary for a Mauna Kea TCP.

Before G. Agaran had to leave, he asked D. Hibbard for his opinion on the results of C. Langlas' additional work. D. Hibbard said that he would have to discuss it with Malhan, because he (Hibbard) thought that the mamane forest was probably a TCP because of the native Hawaiians' traditional conservation ethic. He also said he would check with the Kanahaes again. He said he would do this very soon, and provide the Saddle Road team with his results within one week. That message will contain: 1) his thoughts on mitigation and boundary for Mauna Kea, and 2) his interpretation of the mamane forest as a TCP.

Issues concerning impacts and mitigation were not addressed, because the issue of TCP definition was still unresolved by the time G. Agaran had to leave the meeting.

D. Hibbard was also unsure as to where to draw the boundary around Mauna Kea TCP. Further discussion concerning the TCP boundaries after G. Agaran left emphasized that delineating a specific boundary around the TCP would likely complicate the process further. D. Hibbard seemed to concur that he would not pursue specific site delineation.

SUMMARY

DLNR, as represented by D. Hibbard, does not accept the additional work, or conclusions of the additional work, as appropriate for the mamane forest. DLNR plans to conduct additional discussions in house, and additional questioning of the Kanahaes. Results of that work will be forwarded within one week to the Saddle Road team.

DLNR is uncertain about whether impacts to Mauna Kea are to be assessed during the Saddle Road project. DLNR agrees that it is a TCP, but the size and specific location is not known, and impacts have not been considered by the DLNR.

These notes constitute our understanding of the items discussed during the meeting. If there is an error or if your understanding should differ, please call Tom Wolfarth at 969-1763.

Submitted by:  
PHRI

*Tom Wolfarth*

Tom Wolfarth, M. S.

cc: Attendees  
Nancy E. Burns, Okahara & Associates, Inc.  
Bill Kikuchi, Office of Senator Daniel Inouye  
Alexis Lum, Office of Senator Daniel Inouye  
Wayne Tanaka, Office of Senator Daniel Inouye

## ROEHRIG, ROEHRIG, WILSON & HARA

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TELEPHONE (808) 845-9414  
FACSIMILE (808) 845-5793

OF COUNSEL:  
SHERMAN S. IIEB  
ATTORNEY AT LAW, A LAW CORPORATION

August 14, 1998

Mr. Larry C. Smith, Division Engineer  
Federal Highways Administration  
Central Federal Lands Highway Division  
U.S. Department of Transportation  
555 Zang Street  
Denver, Colorado 80228

Dear Mr. Smith:

Subject: Saddle Road Project-Mamalahoa Highway to Milepost 6  
FHWA Project No. A-AD-6(1)

This is to follow up with respect to my conversations with William Moore of Okahara & Associates, Inc., regarding the Saddle Road Projects potential impacts on the cultural resources within the summit area of Mauna Kea.

As you may be aware, the summit area of Mauna Kea is one of the premier astronomical sites in the world and is the home of thirteen telescopes presently in operation or nearing completion. In recognition of this, the Board of Land and Natural Resources has designated the summit area as the Mauna Kea Scientific Reserve Complex. Management of this Reserve has been assigned to the University of Hawaii through its Institute for Astronomy.

It is our understanding that an assessment of the potential impact of the Saddle Road on Traditional Cultural Properties (TCP) identified the Mauna Kea summit area as a potential TCP, as defined by Section 106 of the National Historic Preservation Act. Furthermore, the assessment indicates that while the Saddle Road project will not have any direct impact on the summit area, the improved road may result in increased traffic to the summit area, creating a potential indirect impact to the historic and cultural resources in the area.

The University of Hawaii is mandated with the responsibility of managing the Mauna Kea summit area. In this regard, the Board of Regents have initiated a program to update the management plan for the Mauna Kea Scientific Reserve Complex. One of the key areas of concern of this management plan is to ensure the archaeological and cultural resources are not adversely impacted by the astronomical facilities or the improved access thereto.

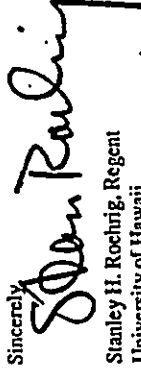
Mr. Larry C. Smith, Division Engineer  
Federal Highways Administration  
Central Federal Lands Highway Division  
Page two

To assist in the development of the management plan, an advisory committee has been established to provide guidance to Board of Regents and the President of the University in addressing a multitude of issues related to the Mauna Kea summit area. The task force includes native Hawaiians, archaeologists, cultural experts, businessmen, environmentalists, and representatives of the various government agencies with regulatory responsibility of the summit area. A specific area of input we have asked this Advisory Committee to address is the relationship of the astronomical facilities in relationship to the archaeological and cultural sites.

In short, it is the responsibility of the University of Hawaii to management the archaeological and cultural resources within the summit area of Mauna Kea. We take this responsibility seriously and will be developing a management plan that will directly address this issue.

Please call me if you have any questions on this matter.

Sincerely,



Stanley H. Roehrig, Regent  
University of Hawaii

cc: President Kenneth Mortimer

Real Development



US Department of Transportation  
Federal Highway Administration

Central Federal Lands Highway Division

555 Zang Street, Room 259  
Lakewood, CO 80228

SEP 22 1998

In Reply Refer To:  
HPD-16/Saddle Road

Ms. Deanna Wieman, Deputy Director  
Cross-Media Division  
US Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Wieman:

I would like to personally thank you for attending the meeting between the Environmental Protection Agency (EPA) and the Federal Highway Administration (FHWA) on September 9, to discuss the wetlands issues for the proposed Saddle Road Project. Your presence was greatly appreciated in initializing the meeting. I also greatly appreciate the quick follow up by Mr. Tom Yocum and believe that we have about worked this out so that we can proceed with the Final EIS.

I am enclosing a copy of our minutes of that meeting for your files. If I can be of any further assistance in providing you with information regarding this project, do not hesitate to call me at (303) 716-2002.

Again, thanks for your timely participation and input.

Sincerely yours,

Larry C. Smith, P.E.  
Division Engineer

Enclosure

cc (w/enclosure):

- Maj. Gen. Alexis Lum (Ret.), Executive Assistant, Senator Daniel K. Inouye, Honolulu, HI
- Ms. Felicia Marcus, Regional Administrator, EPA Region IX, San Francisco, CA
- Mr. Tom Yocum, Environmental Scientist, EPA Region IX, San Francisco, CA

be (w/o enclosure):

- D. Gedeon
- R. Ousting
- B. McCauley

yc: reading file

Central file: HI A-AD-6(1), Saddle Road

BMCCAULEY:jm:9/21/98:L:\environment\wp\bi006\wieman.ltr



US Department of Transportation  
Federal Highway Administration

Central Federal Lands Highway Division

555 Zang Street, Room 259  
Lakewood, CO 80228

OCT 05 1998

In Reply Refer To:  
HPD16/Saddle Road

Mr. Rick Egged, Director  
Office of Planning  
Hawaii State Department of Business,  
Economic Development and Tourism  
PO Box 2359  
Honolulu, HI 96804

Attn: Mr. John Nakagawa, Hawaii CZM Program

Dear Mr. Egged:

Enclosed is a Hawaii Coastal Zone Management Program (HCZMP) Assessment Form for the proposed Saddle Road Project, Mamalahoa Highway to Milepost 6, Hawaii Island. As the project will be utilizing federal funds, a determination of consistency with the HCZMP is required. Our schedule requires publishing of a preliminary Final Environmental Impact Statement for review by State and Federal agencies in mid-November; therefore, we are requesting the determination of consistency prior to that time.

In overview, the project proposes to improve and/or realign Saddle Road (State Highway 200) between Mamalahoa Highway and Milepost 6 near Hilo. Twelve action alternatives under consideration incorporate use of the existing alignment and potential new alignments. The action alternatives reconstruct the existing substandard two-lane roadway to a two-lane roadway with shoulders for a design speed of 80 to 100 kilometers per hour.

Existing Saddle Road is a narrow, winding, two-lane road with steep grades, sharp curves, no shoulders, and poor pavement. The existing road passes through key training areas of the U.S. Department of the Army's Pohakuloa Training Area (PTA), creating conflict between motorists and military training units. The project will improve pavement conditions, increase safety and capacity, improve quality of traffic flow, decrease cross-island travel times, and stimulate economic growth and development. Some alternatives will realign the road within the PTA to minimize conflicts between military and public use.

HAWAII CZM PROGRAM

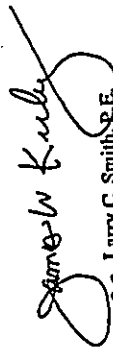
ASSESSMENT FORM

PROJECT DESCRIPTION

See Attached Draft Environmental Impact Statement (DEIS).

Detailed discussion of the project, including maps and description of impacts and proposed mitigation measures, is contained in the Draft Environmental Impact Statement (DEIS) which is enclosed with this CZM Assessment Form. Please call Mr. Bert McCauley, Environmental Project Manager, at 303-716-2141 if you have any questions about the project or require further information.

Sincerely yours,

  
for Larry C. Smith, P.E.  
Division Engineer

Enclosures

cc (w/enclosures):

Mr. Donald Okahara, Okahara & Associates, Hilo, HI  
Ms. Nancy Burns, Senior Project Engineer, Okahara & Associates, Kona, HI

yc: reading file

Central file: HI A-AD-6(1), Saddle Road  
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RECREATIONAL RESOURCES

	Yes	No
1. Will the proposed action involve or be near a dedicated public right-of-way?		X
2. Does the project site abut the shoreline?		X
3. Is the project site near a State or County park?	X	
4. Is the project site near a perennial stream?		X
5. Will the proposed action occur in or affect a surf site?		X
6. Will the proposed action occur in or affect a popular fishing area?		X
7. Will the proposed action occur in or affect a recreational or boating area?		X
8. Is the project site near a sandy beach?		X
9. Are there swimming or other recreational uses in the area?		X

Discussion

(3) The Saddle Road project extends near the boundary of Mauna Kea State Park in the Saddle between Mauna Kea and Mauna Loa. The proposed road improvements will result in greater accessibility to the park which may create a potential increase in visitor use. The Department of Land and Natural Resources, State Parks Division, which manages the park, had indicated that none of the action alternatives encroach on the park's land or will adversely affect its operation. (See DEIS Section 3.3.4.1 and 3.3.4.2.)

**HISTORIC RESOURCES**

1. Is the project site within a historic/cultural district? Yes  No
2. Is the project site listed on or nominated to the Hawaii or National Register of Historic Places? Yes  No
3. Does the project site include undeveloped land that has not been surveyed by an archaeologist? Yes  No
4. Has a site survey revealed any information on historic or archaeological resources? Yes  No
5. Is the project site within or near a Hawaiian fishpond or historic settlement area? Yes  No

**Discussion**

(4) An archaeological inventory survey and historic and traditional cultural assessment was prepared for the proposed project. A total of 21 sites which may be eligible for listing in the National Register of Historic Places, was identified. (See DEIS Section 3.19.) In review the inventory survey and traditional cultural assessment, the State Historic Preservation Officer has determined that none of the sites potentially impacted by the project are significant for preservation in place. Appropriate mitigation measures have been identified in Section 3.19.2.3 of the DEIS.

**SCENIC AND OPEN SPACE RESOURCES**

1. Does the project site abut a scenic landmark? Yes  No
2. Does the proposed action involve the construction of a multi-story structure or structures? Yes  No
3. Is the project site adjacent to undeveloped parcels? Yes  No
4. Does the proposed action involve the construction of structures visible between the nearest coastal roadway and the shoreline? Yes  No
5. Will the proposed action involve construction in or on waters seaward of the shoreline? On or near a beach? Yes  No

**Discussion**

(3) The development of the Saddle Road project will affect the visual character of the area. The potential impacts of the project as well as the proposed mitigation measures were identified in Section 3.21 of the DEIS. It should be noted that the project will not impact any view planes or visual resources from any existing highway to the shoreline.

**COASTAL ECOSYSTEMS**

1. Does the proposed action involve dredge or fill activities? Yes  No
2. Is the project site within the Shoreline Setback area? Yes  No
3. Will the proposed action require some form of effluent discharge into the water? Yes  No
4. Will the proposed action require earthwork beyond clearing & grubbing? Yes  No
5. Will the proposed action include the construction of special waste treatment facilities, such as injection wells, discharge pipes, or cesspools? Yes  No
6. Is an intermittent or perennial stream located on or near the project site? Yes  No
7. Does the project site provide habitat for endangered species of plants, birds, or mammals? Yes  No
8. Is any such habitat located nearby? Yes  No
9. Is there a wetland on the project site? Yes  No
10. Is the project site situated in or abutting a Natural Area Reserve? Yes  No
11. Is the project site situated in or abutting a Marine Life Conservation District? Yes  No
12. Is the project site situated in or abutting an estuary? Yes  No

**Discussion**

(1,9) As discussed in Section 3.11 of the DEIS, wetland indicators are present in several locations along the project corridor. The U.S. Army Corps of Engineers, U.S. Fish & Wildlife Service and the Environmental Protection Agency have been consulted on the project. A Department of the Army permit for the project will be secured prior to the initiation of any work within any designated wetland or other waters of the United States.

(4.5) A National Pollutant Discharge Elimination System permit and a grading permit will be required for this project. These permits will include mitigation measures to reduce pollution associated with grading (see DEIS Section 3.10). Drywells and other drainage structures will be built as part of the mitigation for impacts to drainage. These structures will be built in accordance with State Department of Health regulations. No adverse impact to surface or subsurface water would be expected as a result of these drywells or other drainage structures or improvements.

(6) The project crosses the several intermittent streams. The potential drainage impacts and proposed mitigation measures are provided in Section 3.15 of the DEIS.

(7.8) According to the biological and botanical survey of the project corridors, one endangered mammalian species, ten endangered and one threatened avian species and three endangered and one threatened plant species were identified as potentially being within the project area. In addition, a portion of one of the alternative alignments extend through areas designated as Palila Critical Habitat pursuant to the U.S. Endangered Species Act (ESA). Section 3.18.1 and 3.18.2 of the DEIS identifies the threatened and endangered species and their relationship to the project alternatives and potential environmental consequences of the build alternatives. Section 3.18.3 of the DEIS identifies the proposed mitigation measures. In addition, the requirements of the Section 7 of the ESA will be complied with which requires the implementation of appropriate mitigation measures to ensure the project actions do not "jeopardize" the continued existence of any threatened or endangered species.

**ECONOMIC USES**

- |    |  |     |    |
|----|--|-----|----|
| 1. | Does the project involve a harbor or port?   | Yes | No |
|    |  |     | X  |
| 2. | Is the project site within a designated tourist destination area?                  |     | X  |
| 3. | Does the project site include agricultural lands or lands designated for such use? |     | X  |
| 4. | Does the proposed activity relate to commercial fishing or seafood production?     |     | X  |
| 5. | Does the proposed activity relate to energy production?                            |     | X  |
| 6. | Does the proposed activity relate to seabed mining?                                |     | X  |

**Discussion**

(3) The Natural Resources Conservation Service (NRCS) was consulted to determine the agricultural resources present in the project corridor and vicinity. A discussion of these resources and the potential impact of the project is provided in Section 3.2 of the DEIS. A Farmland Conversation Impact Rating (FCIR) was completed pursuant to the Federal Farmland Protection Policy Act. The assessment evaluates potential impacts to farmlands from implementation of project alternatives. The FCIR process rates the potential impacts using an ascending scale from 0 to 260 points. If the rating exceeds 160 points, consideration must be given to the use of non-farmland or the selection of an alternative less harmful to farming activities.

The Farmland ratings for the Saddle Road action alternatives ranged from 106 to 145 points which are below the threshold ratings. Accordingly, impacts to agricultural lands of importance are not expected to be significant with any of the build alternatives under consideration.

**COASTAL HAZARDS**

- |    |  |     |    |
|----|--|-----|----|
| 1. | Is the project site on or abutting a sandy beach?  | Yes | No |
|    |  |     | X  |
| 2. | Is the project site within a potential tsunami inundation area as depicted on the National Flood Insurance Program flood hazard map? |     | X  |
| 3. | Is the project site within a potential flood inundation area according to a flood hazard map?  |     | X  |
| 4. | Is the project site within a potential subsidence hazard area according to a subsidence hazard map?                                  |     | X  |
| 5. | Has the project site or nearby shoreline areas experienced shoreline erosion?  |     | X  |

**Discussion**

There are no issues relating to coastal hazards associated with the Saddle Road project.



**MANAGING DEVELOPMENT**

- |  | Yes | No |
|--|-----|----|
| 1. Will the proposed activity require more than two (2) permits or approvals?                        | X   |    |
| 2. Does the proposed activity conform with the State and County land use designations for the site?  | X   |    |
| 3. Has or will the public been notified of the proposed activity?                                    | X   |    |
| 4. Has a draft or final environmental impact statement or an environmental assessment been prepared? | X   |    |

**Discussion**

- (1,2) As discussed above, a National Pollutant Discharge Elimination System permit, a Department of the Army Nationwide permit, and a grading permit will be required. In addition, various County permits associated with any road construction will also be necessary.
- (3) Chapter 9 of the DEIS summarizes the history of the Saddle Road project and provides notable milestones to the coordination and public involvement process. There have been numerous one-on-one meetings with interested individuals and public and private organizations to provide information on the project and/or to receive input on project issues and concerns. In addition, public hearings on the DEIS were held in South Kohala and in Hilo on December 11 and 13, respectively.
- (4) The DIES has been prepared for the Saddle Road project. Notice of availability of the DEIS was published in the Federal Register on November 7, 1997 and in the Office of Environmental Quality's Environmental Notice on November 8, 1998. The Final EIS for the Saddle Road project is in the process of being prepared.

**FEDERAL CONSISTENCY  
SUPPLEMENTAL INFORMATION FORM**

Project/Activity Title or Description: Saddle Road (State Route 200) - Mamalahoa Highway (State Route 190) to Milepost 6; FHWA Project No. A-AD-6(1)

Island: Hawaii Tax Map Key: Various

Est. Start Date: Late 2000

**APPLICANT OR AGENT**

Mr. Larry C. Smith, Division Engineer  
Federal Highway Administration  
Central Federal Lands Highway Division  
555 Zang Street, Room 239  
Lakewood, CO 80228

**TYPE OF APPLICATION (check one only)**

- I. Federal Activity (statement "a")  
"The proposed activity is consistent with and will be conducted in a manner consistent to the maximum extent practicable with the Hawaii Coastal Zone Management Program."  
  
 II. Permit or License (statement "b")  
"The proposed activity complies with Hawaii's Coastal Zone Management Program and will be conducted in a manner consistent with such a program."

Signature *[Signature]* Date 10/1/98

Signature \_\_\_\_\_ Date \_\_\_\_\_

III. OCS Plan/Permit

IV. Grants and Assistance



**EcoPlan Associates, Inc.**  
Environmental Science & Resource Economics



US Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street, Room 259  
Lubbock, CO 80228-1103

OCT 26 1998

In Reply Refer To:  
HPD-16E/Saddle Rd

April 1, 1998

Ms. Holly McEldowney  
Department of Land and Natural Resources  
State Historic Preservation Division  
33 South King Street, 6th Floor  
Honolulu, Hawaii 96813

RE: Saddle Road EIS - Volume V

Dear Ms. McEldowney:

Enclosed per your request are the confidential interview records associated with the *Indigenous Hawaiian Cultural Values* technical report from Technical Appendices - Volume V of the Environmental Impact Statement for Saddle Road. Please give us a call if you have any questions or need additional information.

Sincerely,

*Leslie Stafford McEldowney*

Leslie Stafford McEldowney  
Senior Environmental Planner

C: Nancy Burns, Okahara & Associates, Inc.  
Bert McCauley, Federal Highway Administration

Enclosure

Ms. Deanna Wieman, Deputy Director  
Cross-Media Division  
US Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Wieman:

Thank you and your staff for meeting with me and other representatives of the Federal Highway Administration (FHWA) on September 9 to discuss the proposed Saddle Road project on the island of Hawaii. As you know, our discussions focused on two major areas where EPA and FHWA were in disagreement. The EPA has maintained that: 1) The FHWA's preferred alignment within Section IV is not the Least Environmentally-Damaging Practicable Alternative (LEDA); and 2) mitigation measures that have been identified by the FHWA to offset impacts to wetland and aquatic areas within Sections III and IV are insufficient to comply with Clean Water Act regulations.

In our September 9 meeting, the EPA clarified that its position regarding identification of the LEDPA was based on information in our 404(b)(1) Analysis Report (Report) that suggested our preferred alternative had greater wetlands impacts and greater construction costs than other alternatives that had been evaluated. In fact, the alternatives analysis in the Report did include cost estimates that showed the LEDPA to be more expensive; however, these construction cost estimates were in error and have subsequently been corrected (see previous FHWA letter dated September 1). Your staff indicated that they are satisfied with the new construction cost estimates in the revised Table 4 to the Report, pending submission of additional traffic operations cost data that we are furnishing herewith (see enclosure). Given this additional operational cost comparison information, in conjunction with the revised construction cost estimate and supporting documentation previously furnished, we understand that the EPA concurs with our determination that E-3 is the LEDPA in Section IV of the proposed project.

The EPA reiterated its concern that impacts to wetland and aquatic areas be fully offset and that efforts be made to assure that the Saddle Road project not result in reduction in the reach and extent of the nation's waters. The EPA also indicated its belief that the issue of compensatory mitigation may need to be revisited if and when funding for Sections III and IV would lead to the need for the project sponsor, the Hawaii Department of Transportation (HDOT), to obtain Department of Army permits at some time in the future. The HDOT has previously agreed to commit to a re-evaluation of the EIS and examining the 404 issues and mitigation in detail relative to specific roadway designs and within the conceptual mitigation strategy presented in the Report when a project(s) in these sections is programmed. This commitment will be contained in the FEIS and the Record of Decision.

Your staff indicated its general support for the restoration measures within the Rights-of-Way (ROW) that the FHWA has identified to date, but stated that, as worded, there is uncertainty that these measures would offset impacts to acreage and function of wetland and aquatic areas. We stated that, while we were apparently still in disagreement on wetland functions and values upon which to base mitigation proposals, it was our goal to commit to mitigation strategies that, when used to guide future development of a specific mitigation plan, would be roughly equivalent to the area of wetland filled by alternative segments EX-3 and E-3. In view of the fact that the EPA and the FHWA are dedicated to pursuing a "no net loss" policy, we agree that language in the mitigation plan, as presented in the Report, should include better definitions and goals to ensure adherence to this policy. We also agree that this policy should be adhered to in the development of a future mitigation plan only to the extent that achieving such goals is reasonable and practicable, as specified in FHWA's regulations [23 CFR 771.105(d)] and EPA's regulations [40 CFR 230.10(d)].

Your staff also suggested that we add additional compensatory mitigation measures, that the project sponsor may consider in the future, when developing a mitigation plan to meet the requirements of the Clean Water Act regulations (40 CFR 230) as revised. These optional measures could include consideration of acquisition, restoration, preservation, dedication, or a combination of these measures utilizing appropriate parcels of land containing comparable wetland values and functions to compensate for losses that could not be offset practicably or in an ecologically viable way on-site or within the ROW. We agree that consideration of such measures would give the project sponsor additional flexibility in mitigating project impacts within a future regulatory framework and body of ecological knowledge, so long as these measures are not unreasonably costly.

We would like to point out that we share HDOY's concern that these measures, their basis of development, and their application in developing specific mitigation plans, should be applicable only to the Saddle Road project. Other transportation projects and developments, whether governmental or private, should not necessarily be required to comply, in blanket fashion, with this type of mitigation approach. We also agree that early coordination between the project sponsor and the US Army Corps of Engineers could help streamline any permit processing that will be required prior to project construction.

Accordingly, we are proposing to modify Appendix A of the Report to include the following language:

#### Restoration

Restoration is used to mean enabling native vegetation to cover all areas of disturbance within the ROW not essential to the operation and maintenance of the roadway. Restoration may also include acquisition or preservation of lands beyond those needed for ROW for the purpose of offsetting unavoidable impacts of the project to wetland and aquatic areas disturbed by the roadway footprint. The "roadway footprint" is defined as all areas within the ROW which are regularly maintained for the safe and efficient operation of the roadway.

It is anticipated that some restored areas will contain wetland pockets very similar to those in the surrounding area, but creating such pockets is not the primary goal of restoration.

Areas that may be considered for restoration include:

- a. construction damage outside the footprint of the completed roadway;
- b. the cut/fill slopes created by grading, up to the edge of the grassy shoulders;
- c. any abandoned segments, of the existing Saddle Road, pavement to be removed;
- d. any other disturbed areas, such as currently existing parking areas and service roads (this will be done in consultation with HELCO and DLNR to determine the minimum access required, applied within the ROW.);
- e. where feasible, any uneconomic remnants of ROW requiring purchase in disturbed agricultural lands; and/or
- f. lands that can be practicably transferred or acquired and preserved or restored for the purpose of offsetting impacts to values and functions of wetland and aquatic areas. Areas that are adjacent to or nearby the areas of impact and that include areas of similar habitat or function would be considered more appropriate for such transfer or acquisition than areas that are farther removed or dissimilar in nature. Such compensatory mitigation parcels may be transferred to resource agencies or non-profit groups whose long-term interest in habitat protection would make them more appropriate managers of the properties; however, the maintenance of these areas, once transferred, would not be the responsibility of the roadway project owner.

It is the goal of the restoration efforts that restored and preserved habitat will be provided during development of future projects to offset the area of wetlands within the footprint of alternative segments EX-3 and E-3.

I believe that these changes address the concerns that you and your staff have raised, and I am hopeful that the EPA can now concur with us and the other federal agencies that 1) W-3, PTA-1, EX-3, and E-3 in Sections I through IV respectively, is the LEDPA for the proposed project; and, 2) the conceptual mitigation plan or strategy that we have developed provides the tools for the project sponsor to comply with Section 404 of the Clean Water Act when it prepares to move forward on Sections III and IV at some future date.



ENERGY COSTS OF EX-4A vs E-3											
ALTERNATIVE EX-4A				ALTERNATIVE E-3				FUEL SAVINGS			
YEAR	AADT VOLUME (1)	ANNUAL FUEL CONSUMPTION IN GALLONS (2)	FUEL COSTS (3)	YEAR	AADT VOLUME	ANNUAL FUEL CONSUMPTION IN GALLONS (2)	FUEL COSTS	E-3 ANNUAL FUEL SAVINGS (GALLONS)	E-3 ANNUAL FUEL SAVINGS (DOLLARS)	PRESENT WORTH FACTOR (4)	2008 DOLLARS
2008	1,140	85,703	\$191,408.00	2008	1,140	83,220	\$166,440.00	12,483	\$24,968.00	1.000	\$24,968.00
2009	1,300	109,135	\$218,270.00	2009	1,300	94,900	\$189,800.00	14,235	\$28,470.00	0.943	\$26,847.21
2010	1,480	124,248	\$248,492.00	2010	1,480	108,040	\$218,080.00	16,208	\$32,412.00	0.890	\$28,848.68
2011	1,700	142,715	\$285,430.00	2011	1,700	124,100	\$248,200.00	18,615	\$37,230.00	0.840	\$31,273.20
2012	1,925	161,604	\$323,207.50	2012	1,925	140,525	\$281,050.00	21,079	\$42,157.50	0.792	\$33,388.74
2013	2,200	184,690	\$369,380.00	2013	2,200	160,600	\$321,200.00	24,090	\$48,180.00	0.747	\$35,890.46
2014	2,500	209,875	\$419,750.00	2014	2,500	182,500	\$365,000.00	27,375	\$54,750.00	0.705	\$38,588.75
2015	2,850	239,257	\$478,515.00	2015	2,850	208,050	\$416,100.00	31,207	\$62,415.00	0.665	\$41,505.87
2016	3,250	272,838	\$545,675.00	2016	3,250	237,250	\$474,500.00	35,588	\$71,175.00	0.627	\$44,628.73
2017	3,700	310,815	\$621,230.00	2017	3,700	270,100	\$540,200.00	40,715	\$81,030.00	0.592	\$47,969.78
2018	4,225	354,889	\$709,377.50	2018	4,225	308,425	\$618,850.00	46,464	\$92,527.50	0.558	\$51,630.35
2019	4,820	404,839	\$809,278.00	2019	4,820	351,860	\$703,720.00	52,979	\$105,558.00	0.527	\$55,629.07
2020	5,500	461,725	\$923,450.00	2020	5,500	401,500	\$803,000.00	60,225	\$120,450.00	0.497	\$59,863.65
2021	6,260	525,527	\$1,051,054.00	2021	6,260	458,980	\$913,960.00	68,547	\$137,094.00	0.469	\$64,297.09
2022	7,140	599,403	\$1,198,808.00	2022	7,140	521,220	\$1,042,440.00	78,183	\$156,368.00	0.442	\$69,113.77
2023	8,140	683,353	\$1,368,708.00	2023	8,140	594,220	\$1,188,440.00	89,133	\$178,268.00	0.417	\$74,336.02
2024	9,275	778,636	\$1,557,272.50	2024	9,275	677,075	\$1,354,150.00	101,561	\$203,122.50	0.394	\$80,030.26
2025	10,600	889,870	\$1,779,740.00	2025	10,600	773,800	\$1,547,600.00	116,070	\$232,140.00	0.371	\$86,123.94
2026	12,050	1,011,597	\$2,023,185.00	2026	12,050	879,850	\$1,759,300.00	131,747	\$263,895.00	0.350	\$92,363.25
2027	14,000	1,175,300	\$2,350,600.00	2027	14,000	1,022,000	\$2,044,000.00	153,300	\$308,600.00	0.331	\$101,484.60
								TOTAL	1,139,402	TOTAL	\$1,088,888.40
								TOTAL IN 1998 DOLLARS =			\$607,598.61

(1) Total both directions based on linear growth rate of 14% per year.  
(2) Based on 15 mpg and 15% increase in fuel consumption on EX-4A.  
(3) Based on \$2.00/gal average fuel cost.  
(4) Based on 6% discount rate.

ACCIDENT COSTS OF EX-4A vs E-3										
ALTERNATIVE EX-4A				ALTERNATIVE E-3				ACCIDENT SAVINGS		
YEAR	AADT VOLUME (1)	ACCIDENTS PER YEAR (2)	ACCIDENT COSTS (3)	YEAR	AADT VOLUME	ACCIDENTS PER YEAR	ACCIDENT COSTS	E-3 ANNUAL ACCIDENT SAVINGS	PRESENT WORTH FACTOR (4)	2008 DOLLARS
2008	1,140	4.49	\$320,413.84	2008	1,140	3.74	\$287,011.37	\$53,402.27	1.000	\$53,402.27
2009	1,300	5.12	\$365,383.88	2009	1,300	4.27	\$304,486.65	\$60,897.33	0.943	\$57,428.18
2010	1,480	5.83	\$415,975.61	2010	1,480	4.86	\$348,648.34	\$69,329.27	0.890	\$61,703.05
2011	1,700	6.70	\$477,809.82	2011	1,700	5.58	\$398,174.85	\$79,634.97	0.840	\$68,893.37
2012	1,925	7.59	\$541,049.36	2012	1,925	6.32	\$450,874.46	\$90,174.89	0.792	\$71,418.51
2013	2,200	8.67	\$618,342.12	2013	2,200	7.23	\$515,285.10	\$103,057.02	0.747	\$78,983.59
2014	2,500	9.88	\$702,981.50	2014	2,500	8.21	\$585,551.25	\$117,430.25	0.705	\$82,562.73
2015	2,850	11.23	\$801,034.11	2015	2,850	9.38	\$667,528.43	\$133,505.69	0.665	\$88,781.28
2016	3,250	12.81	\$913,459.85	2016	3,250	10.68	\$761,218.83	\$152,241.33	0.627	\$95,456.56
2017	3,700	14.59	\$1,039,939.02	2017	3,700	12.15	\$866,815.85	\$173,123.17	0.592	\$102,807.32
2018	4,225	16.65	\$1,187,497.94	2018	4,225	13.88	\$989,581.81	\$197,916.32	0.558	\$110,437.31
2019	4,820	19.00	\$1,354,731.37	2019	4,820	15.83	\$1,128,942.81	\$225,788.58	0.527	\$118,990.57
2020	5,500	21.68	\$1,545,855.30	2020	5,500	18.07	\$1,288,212.75	\$257,642.55	0.497	\$128,048.35
2021	6,260	24.68	\$1,759,484.40	2021	6,260	20.56	\$1,468,220.33	\$293,244.07	0.469	\$137,531.47
2022	7,140	28.15	\$2,006,801.24	2022	7,140	23.45	\$1,672,334.37	\$334,466.87	0.442	\$147,834.38
2023	8,140	32.09	\$2,287,885.84	2023	8,140	26.74	\$1,908,554.87	\$381,310.87	0.417	\$159,006.68
2024	9,275	36.58	\$2,608,874.17	2024	9,275	30.47	\$2,172,395.14	\$434,479.03	0.394	\$171,184.74
2025	10,600	41.79	\$2,979,284.78	2025	10,600	34.82	\$2,482,737.30	\$496,547.48	0.371	\$184,219.11
2026	12,050	47.50	\$3,388,828.43	2026	12,050	39.58	\$2,822,357.03	\$564,471.41	0.350	\$197,584.99
2027	14,000	55.19	\$3,934,904.40	2027	14,000	45.99	\$3,279,087.00	\$655,817.40	0.331	\$217,075.50
Totals						410		342		\$2,329,128.00
								TOTAL IN 1998 DOLLARS =		\$1,209,653.42

(1) Total both directions based on linear growth rate of 14% per year.  
(2) Based on State average of 3.0 ACC/MVM for E-3 and 17% higher (3.8) for EX-4A  
(3) Based on Roadside Design Guide (AASHTO), \$71,300 per accident (1% fatalities, 50% injury, 49% damage)  
(4) Based on 6% discount rate.



Central Federal Lands Highway Division

555 Zang Street  
Denver, Colorado 80228

NOV 30 1998

In Reply Refer To:  
HPD-16E/Saddle Road

See Distribution List:

Enclosed please find a copy(ies) of the *preliminary* Final EIS for the Saddle Road Project A-AD-6(1), Mamalahoa Highway (SR 190) to Milepost 6. This document is being distributed for your review and comment prior to final revision, printing, and distribution so that we may make certain that all commitments and other representations are adequately presented and stated and that the contents and overall format are satisfactory to all concerned agencies. We are requesting your input on these matters on or before December 18 so that we may meet our schedule for distribution of the final document in February 1999.

The Final EIS has been assembled in three separate parts. Part I is the body of the FEIS and consists of the revised and updated Draft EIS, including the Executive Summary (through the original Appendices. Part II consists of the updated DEIS Chapter 9 (correspondence), all agency and public comments on the DEIS with responses, and Public Hearing transcripts. Part III is a Technical Addendum which contains additional or revised technical studies, reports, agreements, errata sheets, or supplemental information for clarification. The original DEIS Technical Appendices are considered part of the Final EIS by previous distribution. It was decided not to update and re-issue the original DEIS Technical Appendices but rather to provide corrections and revisions to those documents in the text of the FEIS or the additional studies, reports, or errata sheets in the FEIS Technical Addendum. However, much of the information in the original DEIS Technical Appendices is still valid and useful for reference should such referral be required in reviewing the Final EIS.

We will be contacting you shortly to arrange a meeting for review of the document as it pertains to your agency so that we may expedite incorporation of your review comments and/or resolve any details regarding content or format errors or omissions. If you have any questions concerning the document in the interim, please contact Mr. Bert McCauley, Environmental Project Manager at (303) 716-2141.

Sincerely yours,

*Bert McCauley*  
Bert McCauley, R.E.  
Division Engineer

Enclosure

cc: B. McCauley *BMC*  
yc: reading fileL:\environment\wp\11006\distfeis.pro

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 Pacific Islands Office  
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 U.S. Environmental Protection Agency  
 Region IX  
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 San Francisco, CA 94105-3901  
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 Office of Hawaiian Affairs  
 711 Kapiolani Blvd., Suite 500  
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 Hawaii County Planning Department  
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Dr. William Steiner, Director  
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Mr. Don Hibbard  
 Deputy State Historic Preservation Officer  
 Department of Land and Natural Resources  
 33 South King Street, 6th Floor  
 Honolulu, HI 96813  
 (808) 587-0006

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Mr. Michael Wilson, Director  
 Department of Land & Natural Resources  
 1151 Punchbowl Street  
 Honolulu, HI 96813  
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U.S. Department  
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Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zeng Street, Room 259  
Lakewood, CO 80228-1103

DEC 0 9 1998

In Reply Refer To:  
HFD-16E/Saddle Road

Ms. Lynn J. Lee, Land Planner  
Office of Hawaiian Affairs  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii, 96813-5249

Dear Ms. Lee:

Subject: Memorandum of Agreement for Saddle Road Project A-AD-6(1)

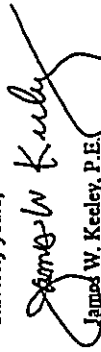
As you know, the Saddle Road Final Environmental Impact Statement (EIS) is scheduled to be completed and available to the public in February 1999. One of the requirements of Section 106 of the National Historic Preservation Act (NHPA) is that the lead agency, in this case the Federal Highway Administration (FHWA), must develop and execute, in consultation with appropriate agencies and organizations, a Memorandum of Agreement (MOA) detailing how the effects of the proposed action upon historic sites will be mitigated. This MOA must be executed by the responsible parties, with concurrences as appropriate, and included in the Final EIS.

As discussed in your meeting with FHWA in October, we have completed our discussions with the State Historic Preservation Division on the content and wording of the MOA and are transmitting herewith a draft copy of the final document for review by the Office of Hawaiian Affairs (OHA). We are interested in any comments that the Trustees of OHA may have on the MOA so that we may secure OHA's signature of concurrence for final processing of the document and inclusion in the Final EIS.

As indicated in our October meeting, representatives of FHWA will be available at your convenience to make any necessary presentations to the appropriate committee(s) or the Trustees prior to consideration of the document for concurrence. We would like to make this presentation as soon as possible in light of the project schedule.

Should you have any questions about the document or the Final EIS process, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 716-2141. Thank you for assistance in advancing the Saddle Road Project.

Sincerely yours,

  
James W. Keeley, P.E.  
Project Development Engineer

Enclosures

cc (w/enclosures):

Hanna Springer, Vice-Chairperson, OHA, 711 Kapiolani Boulevard, Suite 500,  
Honolulu, HI 96813  
Michael D. Wilson, SHPO, Dept. of Land and Natural Resources, State Historic  
Preservation Division, 33 South King Street, 6th Floor, Honolulu, HI 96813  
Mary Ann Naber, Historic Preservation Specialist, Advisory Council on Historic  
Preservation, 1100 Pennsylvania Ave., NW, Suite 809, Washington, DC 20004  
Alexis Lum, Executive Assistant, Office of Senator Daniel K. Inouye,  
300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850  
Kenneth Au, Advance Planning Engineer, Hawaii DOT, 600 Kapiolani Boulevard,  
No. 301, Honolulu, HI 96813  
Merrill Deskins, Environmental Specialist, FHWA, Region 9, 201 Mission Street,  
Suite 2100, San Francisco, CA 94105  
Abraham Wong, Division Administrator, FHWA, III Division, Prince Jonah Kūhiō  
Kalanianaʻole Federal Bldg., 300 Ala Moana Blvd., Rm. 3202, Honolulu, HI 96850  
Tom Wolford, Projects Manager, Paul H. Rosendahl, Inc., 204 Waiannu Avenue,  
Hilo, HI 96720  
Nancy Burns, Senior Project Engineer, Okahara & Assoc., 73-5574 Maiau Street,  
Bay 6B, Kailua-Kona, HI 96740  
Curt Cottrel, Na Ala Hele, Hawaii Division of Forestry & Wildlife, Dept. of Land and  
Natural Resources, 1151 Punchbowl Street, Honolulu, HI 96813  
Milliam B. Trask, Ka Lahui Hawaii, P.O. Box 4964, Hilo, HI 96720  
Hui Malama, 311 Kalanianaʻole, Hilo, HI 96720  
Edith Kanakaʻole Foundation, 1110 Auwae, Hilo, HI 96720  
David Scott, Historic Hawaii Foundation, P.O. Box 1658, Honolulu, HI 96806  
D. Geddon  
R. Cushing  
B. McCauley  
yc: reading file  
Central file - HI A-AD-6(1), Saddle Road  
BMCCAULEY:jm:12/9/98:L:\environment\wp\h006\moatooha.fnl

PM



MEMORANDUM OF AGREEMENT

Among the

ADVISORY COUNCIL ON HISTORIC PRESERVATION  
FEDERAL HIGHWAY ADMINISTRATION and  
HAWAII STATE HISTORIC PRESERVATION OFFICER

Regarding the Saddle Road (SR 200) and  
Hawaii Defense Access Road (A-AD-6-1) Improvement Project on the  
Island of Hawaii, Hawaii

WHEREAS, the Federal Highway Administration (FHWA) has determined that the proposed Saddle Road (SR 200) Improvement Project from Kaunua (at Milepost 6 on Saddle Road) to the intersection of Saddle Road with the Mamoiohoo Highway will have an effect on 20 historic properties which by consensus determination appear to meet the criteria for listing on the National Register of Historic Places (NRHP), and have consulted with the Hawaii State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR and Part 800 regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470j), and

WHEREAS, the Hawaii SHPO has reviewed and concurred with the evaluations and recommendations provided in the *The Saddle Road Corridor: An Archaeological, Historical, and Traditional Cultural Property Inventory Survey, Evaluation and Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project* and with the *Supplemental Traditional Cultural Properties Assessment*, and;

WHEREAS, the State of Hawaii Department of Transportation (HDOT) and the Office of Hawaiian Affairs (OHA) have been consulted in preparation of this Memorandum of Agreement (MOA), and concur with the stipulations contained herein;

NOW, THEREFORE, the Council, FHWA, and SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

STIPULATIONS

1. FHWA shall develop and implement an archaeological data recovery plan that is consistent with the Secretary of the Interior's *Standard and Guidelines for Archaeological Documentation* (48 CFR 4734.37) and takes into account the Council's publication, *Treatment of Archaeological Properties*, and the SHPO minimal standards for archaeological data recovery. The data recovery plan will:
  - Identify sites that require data recovery (see Attachment 1);
  - Present research context and questions to be addressed during data recovery, with an explanation of their relevance and importance;
  - Specify methods to be used, with reference to their relevance to the research questions;
  - Itemize contents of the report on the data recovery effort;
  - Indicate review procedures to be followed;
  - Provide a report completion date;
  - Establish how the results will be distributed; and
  - Give proposed methods by which native Hawaiian groups will be notified when the work is beginning and how they will be provided with a summary of the report findings.

FHWA shall submit the data recovery plan to the SHPO for a 30 day approval review period. Unless the SHPO has specific concerns to procedures, methods, and treatments outlined in the plan within 30 days after receipt and submits those concerns in writing, the FHWA may assume SHPO concurrence and implement as proposed. If SHPO objects to the plan within 30 days of receiving the data recovery plan, it shall be revised as applicable and resubmitted for another 30 day approval review period.

2. FHWA shall ensure that all archaeological materials and records are curated by an institution acceptable to the SHPO in accordance with 36 CFR Part 79.

3. FHWA shall develop and implement a treatment plan for the preservation and interpretation of designated sites (Attachment 1). In most instances, preservation will be achieved through avoidance of the sites. In one instance, Site 20878, efforts will be made to redesign the proposed construction corridor to minimize impact to the site, a trail. Portions of the trail site that cannot be avoided during construction will be included within the data recovery activity, and incorporated into the data recovery plan outlined above.

FHWA shall submit the treatment plan to the SHPO for a 30 day approval review period. Unless the SHPO has specific concerns to procedures, methods, and treatments outlined in the plan within 30 days after receipt and submits those concerns in writing, the FHWA may assume SHPO concurrence and implement as proposed. If SHPO objects to the plan within 30 days of receiving the data recovery plan, it shall be revised and resubmitted for another 30 day approval review period.

4. All parties to this MOA agree that the Mauna Kea Summit area as described in the *Supplemental Traditional Cultural Properties Assessment to The Saddle Road Corridor: An Archaeological, Historical, and Traditional Cultural Property Inventory Survey, Evaluation and Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project* appears to meet the criteria for placement on the NRHP as a Traditional Cultural Property (TCP). All parties further agree that the effects of the Saddle Road Project on this property are indirect, and mitigation of any potential effects can best be addressed as part of the University of Hawaii's (UH) new management plan for Mauna Kea. The UH is responsible for management of the Mauna Kea Scientific Reserve, which includes the Summit area. The UH is in the process of updating the management plan for this area. Therefore, effects upon and related mitigation for the Mauna Kea Summit area are more properly considered within the Area of Potential Effect of actions being planned by the UH concerning the development and management of road access to facilities on Mauna Kea. The Federal Highway Administration agrees to cooperate with the UH in planning for access restriction facilities or signage at the intersection of Mauna Kea Access Road and Saddle Road by considering the inclusion of design or Right-of-Way accommodations as might be reasonably required in the Saddle Road Project at the time the project is advanced.

5. Should any party to this agreement object to the proposed data recovery or treatment plans within the 30 day approval review period pursuant to this agreement, the FHWA shall consult with the objecting party to resolve the objection. If the FHWA determines that the objection cannot be resolved, the FHWA shall forward all

- documentation relevant to the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:
- Provide the FHWA with recommendations to be considered in reaching a final decision regarding the dispute, or
  - Notify the FHWA that it will comment pursuant to 36 CFR 800.6(b), and proceed to comment. Any Council comment provided in response to such a request will be considered by the FHWA in accordance with the 36 CFR 800.6(c)(2) with reference to the subject of the response.

Any recommendations or comments provided by the Council will be understood to pertain to the subject of the dispute; however, the FHWA's responsibility to carry out all actions under this agreement that are not subject to dispute will remain unchanged.

6. Any party to this MOA may request that it be amended, where upon the parties will confer in accordance with 36 CFR 800 to consider such amendment.
7. Execution of the MOA and the implementation of its terms evidence that the FHWA afforded the Council an opportunity to comment on the Saddle Road (SR 200) Improvement Project and its effects on historic properties, and that the FHWA has taken into account the effects of the undertaking on historic properties.

Approved:

**ADVISORY COUNCIL ON HISTORIC PRESERVATION**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**FEDERAL HIGHWAY ADMINISTRATION**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**STATE OF HAWAII HISTORIC PRESERVATION OFFICER**

By: \_\_\_\_\_ Date: \_\_\_\_\_

Concur:

**OFFICE OF HAWAIIAN AFFAIRS**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**HAWAII DEPARTMENT OF TRANSPORTATION**

By: \_\_\_\_\_ Date: \_\_\_\_\_



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

Larry Smith, Division Engineer  
Federal Highway Administration  
Central Federal Lands Division  
555 Zang St.  
P.O. Box 25246  
Denver CO 80225-0246

DEC 16 1999

ATTACHMENT 1

SHLP #	Description	Site Name	Mitigation
20852	Historic burial		Preserve; avoid
20854	Historic ranching		Data recovery
20855	Historic transportation	Waihoa to Kea road	Data recovery
5002	Historic ranching	Kea'ole well	None
5003	Prehistoric temporary habitation		Preserve; avoid
14638	Prehistoric temporary habitation		Preserve; avoid
20862	Historic ranching		None
20863	Historic ranching		None
20877	Historic ranching		None
21150	Historic transportation	Hemo'ula wagon road	Data recovery; interpretation
7119	Historic ranching	Hemo'ula wells	Interpretation; monitor periodically
10309	Historic transportation	1a'u 'O'o Trail	Monitor periodically
20856	Historic ranching		None
20878	Historic transportation	Hilo Pu'u 'O'o Trail	Data recovery; interpretation
20864	Historic transportation	Saddle Road	Interpretation
20869	Historic survey marker		None
20870	Historic agriculture	'Oka's Flame	Interpretation
20872	Historic recreation	Hilo Country Club	None
20873	Historic habitation		None
TCP	Mauna Kea Summit Area		Preserve per UH Mauna Kea Preservation Plan

Dear Mr. Smith:

Thank you for your recent letter on Saddle Road. It resolved EPA's remaining issues regarding the project's compliance with Section 404 of the Clean Water Act, not only with regard to the selection of the least environmentally-damaging practicable alternative [see 40 CFR 230.10(a)], but with the need for reasonable and practicable measures to offset unavoidable impacts to wetland and aquatic areas [see 40 CFR 230.10(c) and (d)].

As you know, EPA was concerned that the preferred alignments for Segments 3 and 4 of the project on the Hilo side might not constitute the least environmentally-damaging practicable alternative under the regulations, but our concern was based, in part, upon economic figures that your office has subsequently corrected. The revised figures indicate that these preferred alignments would comply with federal Clean Water Act regulations and, as such, we can now support your selection of these alignments.

Similarly, we were concerned that the compensatory mitigation measures that had been proposed previously would not offset project impacts to wetland and aquatic areas. We discussed potential options for such mitigation measures with you and your staff, and agree that such measures should seek to meet the Administration's goal of no net loss of wetlands. We also agree that the unique features and limited function of the wetland mosaic that would be affected would justify greater flexibility with regard to the location and nature of the compensatory mitigation efforts, if and when these southern portions of the Saddle Road project are funded and construction is proposed.

We appreciate the efforts of you and your staff to work with us to reach consensus on this project. Each highway project is different and, as was the case herein, pose different challenges and solutions. As such, we do not consider the resolution of this matter to establish any precedent regarding future projects that we may review. I'm sure that it will continue to be our shared goal, nonetheless, to minimize environmental harm through all practicable means, and to take appropriate steps to offset adverse environmental impacts that cannot be avoided.

We look forward to working with you and your staff in the future. Thank you for responding to our concerns and working with us to reach a mutually-acceptable and environmentally-preferable alternative for the Saultle Road Project.

Sincerely,



Deanna Wieman  
Deputy Division Director  
Cross Media Division

01/21/99 12:00 FAX 1 808 328 1005  
JAN-07-1999 16:32 FHAT-CLJ-16

OKAIAHA - HONA

01010

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JAN 21 1999	
FBI - HONOLULU	

ENGINEER  
Deanna Wieman

TO: Michael Beck, Administrator  
FR: Paul Casey, Wildlife Program Manager  
SU: Leader of mitigation portion of Saultle Road Project

Paul Casey

I reviewed the mitigation portion of Saultle Road Project EIS and have the following comments and concerns.

- Overall comment:** Throughout the portion of the document describing the mitigation activities, MEO is identified as the agency leading mitigation activities on State lands. DELNE/DONAW should be identified as the lead agency for implementation of mitigation measures on State lands. The one exception is that MEO will take lead in the public outreach and monitoring project. DELNE/DONAW should take lead on State lands with mitigation measures for those construction, vegetation control, and other species control, earth fencing, watering at Kaha (GMA) and the monitoring of those activities. This needs to be verified in all written discussing management actions on State replacement lands.
- A major concern is that the funding for mitigation activities on State lands over the course of year 2-10 is dependent on MEO successfully getting the money put into their budget through the normal budget process (7). Knowing the type and amount of the normal budget process and the difficulty that MEO has had in getting increases in the normal budget process, it seems unlikely that MEO will be able to get the \$670,000 to \$1.3 million budget increases on a consistent basis over a 10 year period. DELNE will be required to enter into a mitigation agreement that contains State increases up front without a commitment of funding to carryout the necessary management actions over the life of the project.
- Despite success, the mitigation package includes removal of final vegetation on state replacement lands being put into public habitat management. The language in the text calls for the "removal of all vegetation". The Department agrees with the goal to reduce non-forest/land habitat in those areas and allows the lands to public ownership. One of the management actions that will be used to achieve this is the removal of final vegetation from those areas. However, we have two concerns, 1) that the language used may force an aerial eradication attempt for a vast number of habitats that it may not biologically not necessary to remove the habitat, and 2) that this language would preclude the use of controlled burns grazing as a management tool. Our earlier discussion, regarding specific language for discussion of vegetation removal, Page 5-19), para 3. For habitat restoration to proceed while the same identified areas (state replacement lands), they will be fenced and both domestic and feral vegetation removed and maintained at low-vegetation levels where not being used as a management tool."

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3194-87-1999 16132 FHAI-CFLHO-16

Management of replacement lands should be flexible to allow other compatible uses such as recreation, game land banking, or other uses identified in that of the relevant forest inventory.

5. When conducting soil, vegetation, and other surveys on state lands, the public must be involved in land use planning activities.



REFRY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII  
SCHOFIELD BARRACKS, HAWAII 96857-5000

DEC 7 1998

Office of the Commander

Mr. Larry C. Smith, P.E.  
Division Engineer  
Central Federal Lands Highway Division  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Denver, Colorado 80228

Dear Mr. Smith:

Reference your letter, dated November 30, 1998, requesting our review and comment on the preliminary Final EIS for the Saddle Road Project (State Route 200), Mamalaioa Highway (State Route 190) to Milepost 6, County of Hawaii, State of Hawaii (FHWA Project No. A-AD-6(1)).

This letter consolidates all U.S. Army Garrison, Hawaii (USAG-HI) review comments and includes input from Colonel Barry N. Tolten, Director of Public Works, and Lieutenant Colonel David Hergenrother, Pohakuloa Training Area (PTA) Commander. I firmly support your efforts to realign Saddle Road in the vicinity of PTA as an enhancement to military training.

a. Paragraph S-1. Last paragraph on page S-1. The statement, "PTA serves as the only light infantry, live-fire training facility in the Pacific for the U.S. Army Pacific Command (USARPAC) and other Pacific Command Units," should read: "PTA provides unique training opportunities to the 25<sup>th</sup> Infantry Division (Light) and units of other services supported by U.S. Army, Hawaii. These unique opportunities include live-fire maneuver training by larger size infantry units than can be accommodated on Oahu, the ability to fire certain weapons systems at their maximum range, and the ability to train and certify aviation units. PTA plays an important role in complementing other Army live-fire training ranges on the Island of Oahu."

b. Palila Mitigation Memorandum of Understanding (MOU), Part III. Technical Addendum. USAG-HI is committed to fulfilling its obligations under the MOU. We are now preparing an Environmental Assessment for fencing approximately 3,700 acres in the Kipuka Alala area of southwestern PTA and for constructing a smaller enclosure to protect a population of the threatened plant, *Silene hawaiiensis*, near "Deadman's Curve." Fencing will be accomplished with the assistance of Hawaii Volcanoes National Park. Due to the large size of the Kipuka Alala enclosure, that project will be constructed in three phases. This fiscal year, approximately 2 miles of fence will be installed. Another 4 miles will be fenced in each of FY's 00 and 01. While the FY 00 and 01 phases are currently an unresourced requirement within the command, I am committed to getting the funds necessary to fulfill our obligations under the MOU.

TOTAL P. 05

01/07/99 13:27 TX/RX NO.5678 P.010





**DEPARTMENT OF BUSINESS,  
ECONOMIC DEVELOPMENT & TOURISM**

**OFFICE OF PLANNING**

235 South Berolania Street, 6th Fl., Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Ref. No. P-7862

December 23, 1998

Mr. Larry C. Smith  
Division Engineer  
Federal Highway Administration  
Central Federal Lands Highway Division  
555 Zang Street, Room 259  
Lakewood, Colorado 80228

Dear Mr. Smith:

**Subject: Hawaii Coastal Zone Management (CZM) Program Federal Consistency  
Review for Improvements to Saddle Road, Mamalahoa Highway to Milepost 6,  
Island of Hawaii**

Your proposal to construct improvements to Saddle Road, State Route 200, between Mamalahoa Highway and Milepost 6, has been reviewed for consistency with Hawaii's CZM Program. We concur with your CZM determination that the activity is consistent to the maximum extent practicable based on the following conditions.

1. The mitigation measures identified and described in Chapter 3 of the draft environmental impact statement will be fully implemented. It is our understanding that additional mitigation measures to protect wetlands and habitat for the endangered *psittia* have been developed in consultation with the U.S. Environmental Protection Agency and the U.S. Fish and Wildlife Service.
2. As indicated in the draft environmental impact statement (Sec. 3.19.2.3, p. 3-197), consultation with the Department of Land and Natural Resources, Historic Preservation Division, under Section 106 of the National Historic Preservation Act will result in a memorandum of agreement which will provide for mitigation measures.
3. This CZM consistency concurrence does not cover the anticipated Department of the Army Permit review for wetland fills. A separate CZM consistency review and approval is required in conjunction with the Department of the Army Permit because specific project impacts, such as wetland impacts and mitigation relative to specific roadway designs, will be evaluated during the Corps' permit review. Specific CZM concerns may arise during the Department of the Army Permit review.


BENJAMIN A. CAVEIANO  
GOVERNOR  
SCOTT W. WALKER  
COMMISSIONER  
BRADLEY J. MOSSMAN  
DEPUTY DIRECTOR  
RICK EGGERD  
DIRECTOR, OFFICE OF PLANNING

Tel.: (808) 587-2846  
Fac: (808) 587-2824

Mr. Larry C. Smith  
Page 2  
December 23, 1998

CZM consistency concurrence is not an endorsement of the project nor does it convey approval with any other regulations administered by any State or County agency. Thank you for your cooperation in complying with Hawaii's CZM Program. If you have any questions, please call John Nakagawa of our CZM Program at 587-2878.

Sincerely,

  
Bradley J. Mossman  
Director  
Office of Planning

cc: U.S. Army Corps of Engineers, Operations Branch  
U.S. Fish and Wildlife Service, Pacific Islands Ecoregion  
Department of Health, Clean Water Branch  
Department of Land & Natural Resources,  
Planning & Technical Services Branch  
Department of Transportation, State of Hawaii  
Planning Department, County of Hawaii  
Ron Terry, Ph.D.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Ecoregion  
300 Ala Moana Boulevard, Room 3-122  
Box 50088  
Honolulu, Hawaii 96850

In Reply Refer To: HPD-16E/Saddle Road (kwr)

Larry C. Smith, P.E.  
Division Engineer  
U.S. Department of Transportation  
Federal Highway Administration  
555 Zang Street  
Denver, Colorado 80228

Re: Preliminary Final Environmental Impact Statement (EIS) for the Saddle Road Project A-AD-6(1), Maaialahoa Highway (SR 190) to Milepost 6.

Dear Mr. Smith:

Thank you for transmitting a copy of the preliminary final EIS for the Saddle Road Project for our review. We have reviewed the preliminary final EIS and offer the following comments pursuant to the National Environmental Policy Act of 1969 (42 U.S.C. 4321 *et seq.*; 83 Stat. 852), as amended (NEPA), the Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661 *et seq.*; 48 Stat. 401), as amended, the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*; 87 Stat. 884), as amended (ESA), and other authorities mandating U.S. Fish and Wildlife Service (Service) concern for environmental values.

The preliminary final EIS adequately addresses all of the concerns that we expressed in our review of the draft EIS and adequately incorporates all information from the Service's July 27, 1998, biological opinion, 1-2-98-F-01, for the project. Our only suggested change is that the fire management plan to be developed by the fire ecologist, as described in section 3.9.3, Mitigation Measures for Fire Hazard, consist primarily of a *fuels management plan*, complete with fuels management goals, objectives, and methods.

Thank you for the opportunity to review the preliminary final EIS. We look forward to working with you on implementation of the important mitigation measures identified in this document. If you have any questions, please contact Assistant Field Supervisor Karen Rosa (phone: 808/541-3441; fax: 808/541-3470).

Sincerely,

*Karen Rosa*  
for Robert P. Smith  
Pacific Islands Manager

Division of Forestry & Wildlife

1151 Punchbowl Street, Rm. 325 • Honolulu, HI 96813 • (808) 587-0166 • Fax: (808) 587-0160

December 28, 1998

MEMORANDUM

TO: Ed Henry, Planner  
Division of Land Management

THRU: Dean Uchida, Administrator  
Division of Land Management

FROM: Michael G. Buck, Administrator  
Division of Forestry and Wildlife

SUBJECT: Preliminary Final EIS (FEIS) for the Saddle Road Project, Maaialahoa Highway

We have reviewed the mitigation portion of Saddle Road Pre-Final EIS and have the following comments and concerns.

1. General comment: Throughout the portion of the document describing the mitigation activities, BRD is identified as the agency initiating mitigation actions on State lands. DLNR/DOFAW should be identified as the lead agency for implementation of mitigation measures on State lands. The one exception is that BRD will take lead in the Paliia relocation and monitoring project. DLNR/DOFAW should take the lead on State lands with mitigation measures for fence construction, ungulate control, predator and alien species control, cattle fencing, mowing at Kaole GMA and the monitoring of these activities. This needs to be revised in all sections discussing management actions on State replacement lands.
2. A major concern is that the funding for mitigation actions on State lands over the course of year 2-10 is dependent on BRD successfully getting the money put into their budget through the normal budget process (?). Knowing the ups and downs of the federal budget process and the difficulty that BRD has had in getting increases in the normal budget process, it seems uncertain that BRD will be able to get the \$670,000 to \$1.3 mil annual budget increase on a consistent basis over a 10 year period. DLNR will be reluctant to enter into a mitigation agreement that commits State resources up front without a commitment of funding to carry-out the necessary management actions over the life of the project.





U.S. Department  
of Transportation  
Federal Highway  
Administration

Ed Henry  
December 28, 1998  
Page 2

**Central Federal Lands Highway Division**

555 Zang Street  
Littleton, CO 80228  
(303) 716-2141  
Fax: (303) 969-5903

**FAX TRANSMISSION COVER SHEET**

Date 29 DEC 98  
To See Addressee List  
Fax Various  
Subject Preliminary Final EIS Review - Saddle Road Project  
Sender Bert McCauley

**2 PAGES TOTAL TRANSMITTED. IF NOT RECEIVED CALL (303) 716-2141.**

3. Ungulate removal. The mitigation package includes removal of feral ungulates on state replacement lands being put into public habitat management. The language in the text calls for the "removal of all ungulates". The Department agrees with the goal to restore mamane/naio habitat in these areas and dedicate the lands to public recovery. One of the management actions that will be used to achieve this is the removal of feral ungulates from these areas. However, we have two concerns, 1) that the language used may force an aerial eradication scenario for a remnant number of animals that is costly and biologically not necessary to recover the habitat, and 2) that this language would preclude the use of controlled cattle grazing as a management tool. Our earlier discussions, grazing of corridors or for experimental purposes such as fire control was an option. Regarding specific language for discussions of ungulate removal: Page 3-191, para 3. "For habitat restoration to succeed within the areas identified above (state replacement lands), they will be fenced and both domestic and feral ungulates removed and maintained at inconsequential levels where not being used as a management tool."

4. Management of replacement lands should be flexible to allow other compatible uses such as recreation, game bird hunting, or other uses identical to that of the adjacent forest reserve.

5. When conducting feral ungulate removal activities on state lands, the public must be involved in initial ungulate control activities.

C: Hawaii DOT/FW Branch

The Federal Highway Administration is interested in finalizing agency comment on the Final EIS as soon as possible in order to maintain the schedule for implementation of the Saddle Road Project. Accordingly, we are requesting a meeting with you or a representative of your office during the week of January 11, 1999 to finalize all comments on the document now in circulation and resolve any remaining issues prior to final publication.

Members of our consulting staff will be following up by phone to schedule document review meetings during the above week in January. Please feel free to call in the interim should you have any questions on the document text or content. We look forward to meeting with you at that time.

*Bert McCauley*

Bert McCauley  
Environmental Project Manager

From The Desk Of...

Bert McCauley, P.E.  
Environmental Project Manager  
Central Federal Lands Highway Division  
555 Zang Street  
Littleton, CO 80228  
(303) 716-2141  
(303) 969-5903 FAX



U.S. Department  
of Transportation  
Federal Highway  
Administration

December 29, 1998

Re: Saddle Road Project  
Preliminary FEIS

Addresses:

Kenneth Au, Advance Planning Engineer, HIDOT	(808) 587-1787
Alexis Lum, Executive Assistant to Senator Inouye	541-2549
Virginia Goldstein, Director, Hawaii County Planning Dept.	961-8742
Lynn Lee, Land Planner, OHA	594-1865
Michael Buck, Administrator, DOWAW	587-0160
Deana Uchida, Administrator, Land Division	587-0455
Don Hibbard, Deputy SHPO, SHPD	692-8020
Mr. Robert Smith, Manager, USFWS Pacific EcoRegion	541-3470
Bill Steiner, Director, BKD/USGS	956-5687
COL Owen Ryan, Commander, USAG-HI	655-1683
LTC David Hergenroeder, Commander, PTA	538-3501
Wayne Hamaguchi, Chief Planner, USARPAC	438-8690
COL Darryl Totten, Director, DPW, USAG-HI	656-0200
LTC Ralph Graves, Commander, USACE, Honolulu District	438-8351
Abe Wong, Division Administrator, FHWA, Hawaii Division	541-2704
Peter Cline, Senior Engineer for Access Roads, MTMC	(757) 599-1560

Fax Number

(808) 587-1787
541-2549
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587-0160
587-0455
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655-1683
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656-0200
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U. S. Department of the Interior  
U. S. GEOLOGICAL SURVEY  
BIOLOGICAL RESOURCES DIVISION  
PACIFIC ISLAND ECOSYSTEMS RESEARCH CENTER

Kilauea Field Station  
PO BOX 44, Building 244  
Hawaii National Park, Hawaii 96718  
(808) 967-7396 FAX (808) 967-8568

30 December 1998

Mr. Bert McCauley  
U.S. Department of Transportation  
Federal Highways Administration  
Central Federal Lands Division  
555 Zang Street  
Lakewood, CO 80228

Dear Mr. McCauley:

The final Environmental Impact Statement prepared by your office for the Saddle Road (Hawaii State Route 200) comprehensively presents results of biological surveys, considers major problems which may result from the proposed realignment and improvement of Saddle Road, and suggests adequate and appropriate mitigation measures.

I appreciate that you and others associated with the project consulted extensively with biologists knowledgeable about palila and their habitat requirements. Biologists who have spent the past ten years investigating palila life history and limiting factors are confident that the mitigation plan is appropriate. If implemented properly, it will enhance the recovery of palila on Mauna Kea. Furthermore, the plan should provide impetus to federal and state agencies to develop and implement a comprehensive plan to recover palila and its habitat elsewhere in its historical range, including Mauna Loa and Hualalai volcanoes. Without this mitigation, it is difficult to say when more significant recovery actions might be initiated.

I am pleased that the mitigation plan appears in the final EIS in the same basic configuration as when it was conceived among biologists and resource managers. Because its content and form remain intact, biologists familiar with palila conservation problems can continue to endorse it. I thank you and other associated with the planning of the project for taking our concerns and suggestions seriously and for facilitating the development of the mitigation plan.

Because mitigation for palila has been carefully considered during the past several years of planning and preparing the final EIS, I have confidence that Federal Highways Administration (FHWA) will continue to provide responsible oversight and coordination of the mitigation. Although it is not clearly stated (for example, Part 1, p. 3-189, 4<sup>th</sup> paragraph), I understand that USGS-Biological Resources Division (BRD), US Fish and Wildlife Service (USFWS), US Army Garrison, Hawaii (USAG-HI) and Hawaii Division of Forestry and Wildlife (DOPAW) will act in an advisory capacity to FHWA during the implementation of the mitigation.

I would like to offer some suggestions that may clarify issues regarding hiring a fire ecologist and designating the mitigation lands on Mauna Kea. With regard to the fire ecologist, there were discrepancies in the text (for example, Part 1, p. 3-192, p. 3-197) and Table 3.18.3.1 (Part 1, p. 193-195) concerning what agency would be responsible for hiring and supervising. The text indicates that the fire ecologist

would be hired by USAG:III from Pohakuloa Training Area EMP funds, whereas the table indicates that BRD would be responsible for hiring. During the 30 June 1998 multi-agency meeting at the Turtle Bay Hilton, I understood that BRD would assume responsibility for hiring the fire ecologist. It is my intention to maintain the fire ecologist on mitigation funding for three years (FY2000-2002), before switching the position to BRD base funds to continue with work on Mauna Kea and other dry woodlands. I believe there is relevancy and need for a fire ecologist within BRD and have included such a position in my organizational planning.

I also encountered some confusion in the EIS about how proposed mitigation lands on Mauna Kea were designated. The problem stems from the use of "Ka'ohle lease" lands, especially in conjunction with "Pu'u Mali" (for example, Part 1, p. 3-197, 2<sup>nd</sup> paragraph; p. 3-198, 2<sup>nd</sup> & 4<sup>th</sup> paragraphs). Ka'ohle is a large land division which occurs around much of Mauna Kea and includes mitigation lands on the western and northern slopes. Ka'ohle lease lands on the western slope are adjacent to Ka'ohle Game Management Area and Mauna Kea Forest Reserve, where paliia are concentrated. Consequently, we believe that paliia will naturally recolonize this mitigation area as habitat conditions there improve, and they will not require active reintroduction from the adjacent area. However, paliia will require active reintroduction to the forest reserve just above Pu'u Mali and the Ka'ohle lease lands on the northern slope. As habitat conditions improve on northern Ka'ohle lease lands designated for mitigation, paliia which become reestablished in the forest reserve through relocation will eventually move down into this area. Therefore, it is confusing to indicate that paliia must be relocated to Ka'ohle lease lands on either the western or northern slopes. It might be better to refer to mitigation lands on "northern" and "western" slopes instead of referring to "Ka'ohle" lands.

In addition, I found a small error which creates some minor disorientation. Pu'u Lau (= La'au) is reported (Part 1, p. 3-180) to be 1 km uphill of the project area when, in fact, it is about 4.6 km uphill from Saddle Road.

Again, I thank you for allowing BRD to assist you and others in developing a mitigation plan. If implemented as intended, the mitigation plan will considerably assist the recovery of paliia, its habitat, and associated species. It also provides for much needed fire management of the unique dry forest that supports paliia and many other endemic species. Finally, it is noteworthy that the plan does not exclude the public from lands intended to be managed for paliia. Indeed, the plan would enhance sport hunting and other opportunities for the public to enjoy their natural resources.

1.4.6 Chronological Correspondence and Notices, 1999

Correspondence from:	Correspondence to:	Date
University of Hawaii - Hilo	DLNR	
USGS	FHWA	1-5-99
FHWA	HHC	1-7-99
FHWA	Distribution list	1-7-99
HDOT	Okahara & Associates, Inc.	1-7-99
DLNR	FHWA	1-12-99
FHWA	Project files	1-27-99
DLNR	FHWA	2-3-99
DLNR	Tom Wolforth	2-23-99
DLNR	Tom Wolforth	3-3-99
FHWA	Arthur E. Hamilton	3-11-99
DOA	FHWA	4-1-99
DLNR	FHWA	5-4-99



UNIVERSITY  
OF HAWAII  
**HILo**

DNR Log No: 22778  
DNR Doc. No: 9012UM03

Mr. Don Hibbard  
Historic Preservation Division  
Department of Land and Natural Resources  
Kakuhewa Building, Room 555  
001 Kamohila Blvd  
Kapolei, Hawaii 96707

Dear Mr. Hibbard,

Subject: Revision of: Supplement to Archaeological, Historical and  
Traditional Cultural Property Assessment for the Hawaii  
Defense Access Road A-70-6(1) and Saddle Road (SR 200)  
Project (Langlan, July 1998)

We heroby submit a new copy of the supplement, as revised by Dr. Langlan in February, 1999. No substantial revisions were made to the evaluation of Hawaiian cultural sites nor to the analysis of potential effects which might result from the Saddle Road project. However, two clarifications were made to the wording of the report, where it seems the author unintentionally gave the reviewers a misimpression, as follows.

- 1) The author intended to conclude that although the whole upper zone of Mauna Kea should be considered eligible as a traditional cultural property for the National Register of Historic Sites (as a historic district), he cannot recommend that the summit peak be considered eligible as a specific site, because he cannot make public the information he collected from Kupuna X (see p. 10). Contrary statements included in generalizations on page 16 and pages 10-19 were inadvertently left in the text from an earlier draft. They have been removed from this revision.
- 2) The author intended to recommend that mitigation to deal with the effects of increased traffic on Mauna Kea should focus on visitor education, monitoring and enforcement of regulations. Limitation of visitor access is not recommended except as a last resort. Pages 17-18 have been rewritten to clarify this.

Social Sciences  
200 W KAPOLI STREET  
HILO, HAWAII 96720-4071  
PHONE: (808) 934-7400  
FAX: (808) 934-7737

An Equal Opportunity/Affirmative Action Institution

Additional minor changes were made on page 4, pages 5-6, page 8 and page 12. The latter two changes reflect comments received in the review letter from Historic Preservation Division dated February 3, 1999.

Two copies are enclosed. One is a clean copy and the other is a redlined copy to show the revisions made.

Sincerely,

Dr. Charles Langlan  
Tom Wolforth.

*Charles Langlan*  
*Tom Wolforth*

encl: report

cc: Larry Smith, FHWA w/encl

Supplement to  
Archaeological, Historical and Traditional Cultural Property  
Assessment for the Hawai'i Defense Access Road A-AD-6(1) and Saddle  
Road (SR200) Project

by Charles Langlas, University of Hawaii-Hilo, July 1998 (Revised February 1999)

Introduction

This supplement describes additional ethnographic research carried out for the Hawai'i Defense Access Road and Saddle Road Project, requested by the Hawai'i State Historic Preservation Division (SHPO). A draft copy of the main report was submitted in April 1997. Review comments on the draft were made by the SHPO in July 1997 (see Appendix G to the main report: SHPO Comments on an Earlier Draft) and a revision of the report was submitted in April 1998.

In addition to the review comments, the SHPO requested further ethnographic research in a letter written on November 14, 1997 (see Appendix H to this supplement). Specifically, the SHPO asked for research on two areas which might be considered traditional cultural properties under the National Historic Preservation Act, the māmāne-naio forest which lies east of the cantonment and air field in Pohakuloa Training Area (PTA) and the mountain Mauna Kea which lies north of the Saddle Road. (See Figure 1.) The upper zone of Mauna Kea is most easily reached via the Mauna Kea Access Road which starts up from the Saddle Road some ways east of PTA. Within the general area of these two properties there are two possible routes for the Saddle Road improvement project: Ex-2 is a reconstruction along the existing Saddle Road alignment, and PTA-1 is a new alternative route. PTA-1 has been determined by the project to be the preferred route, when the various impacts and design considerations are weighed. (See the forthcoming EIS for a complete discussion.)

SHPO's request was prompted by another report produced as part of the Environmental Impact Statement for the Saddle Road project by Pualani and Edward Kanahelo, entitled A Social Impact Assessment: Indigenous Hawaiian Cultural Values of the Proposed Saddle Road Alignments (1997). Research with informants and consultation with Native Hawaiian Organizations was carried out from January to May 1998, designed (1) to evaluate the two areas as to their potential eligibility for the National Register of Historic Places, and (2) if eligible, to determine the effect of the project and how to mitigate any adverse effect. The consultation carried out is described in Appendix I to this supplement.

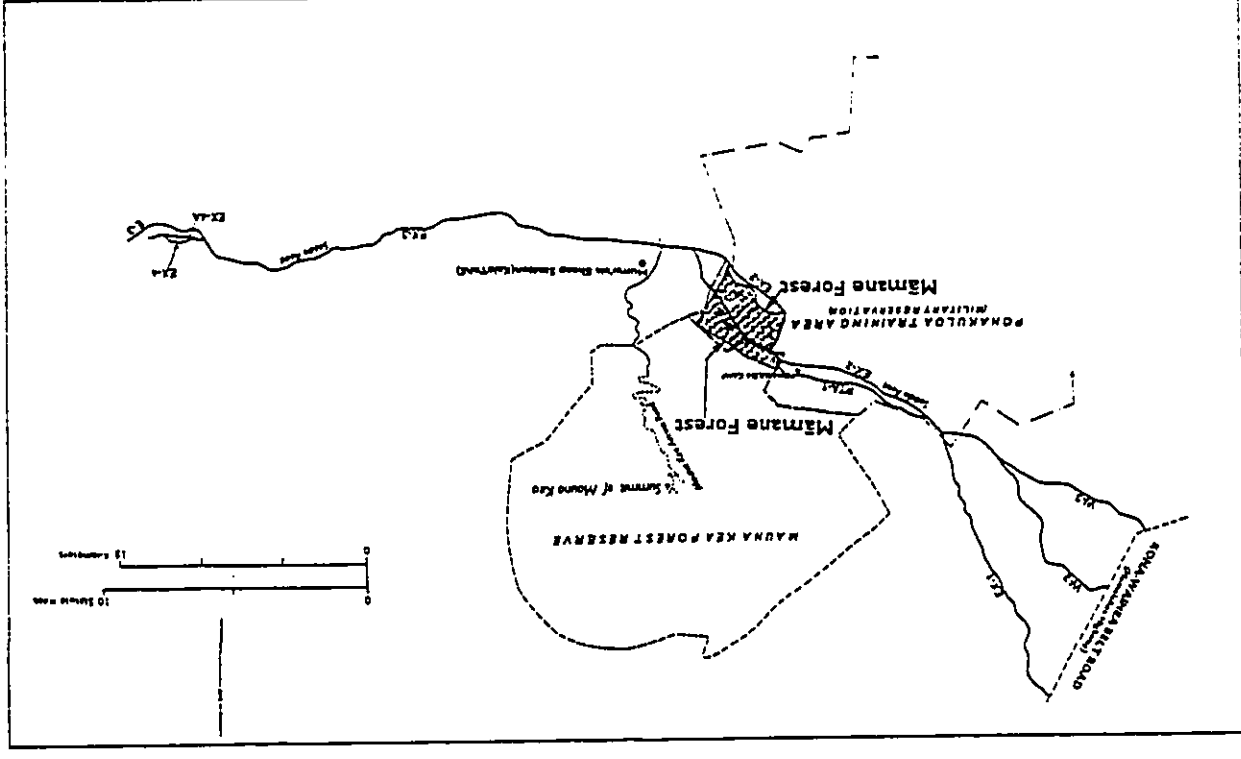


Figure 1. Project Corridors in Relation to PTA Māmāne Forest and Mauna Kea

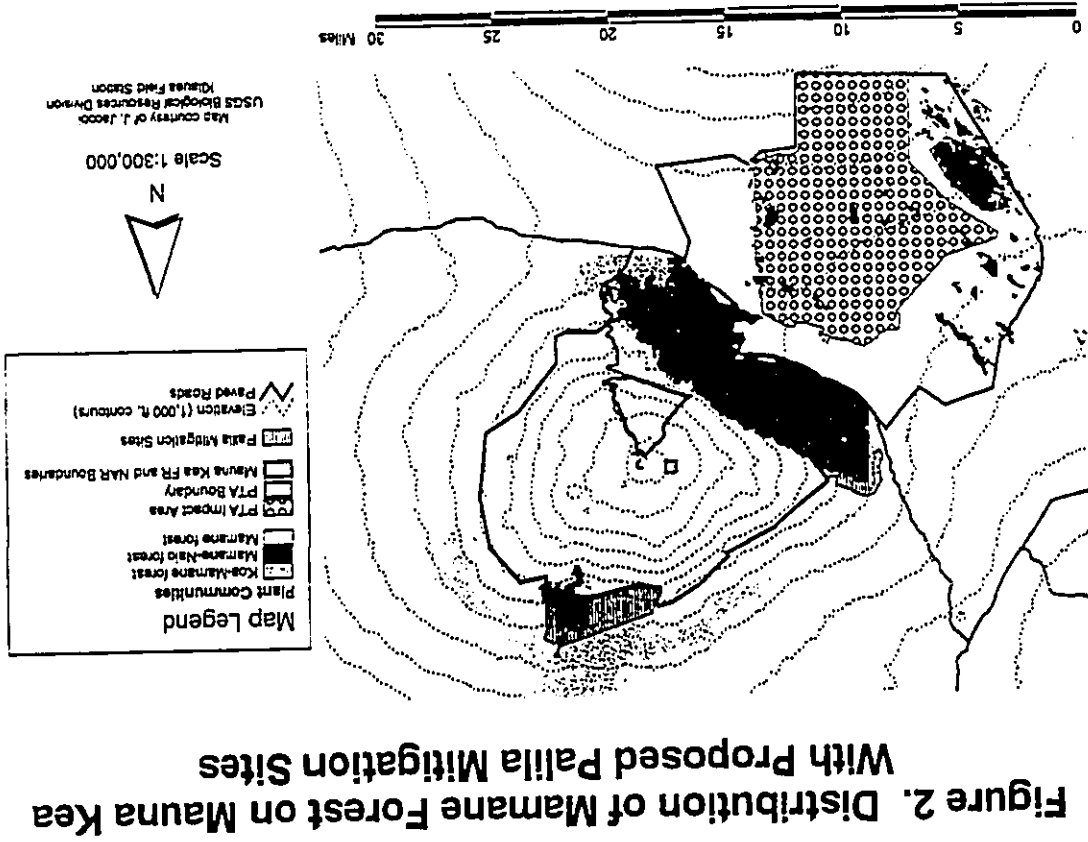
### Part I. PTA Māmane-Naio Forest

The Hawaiian cultural material presented here is based on the report written by Kanahelo and Kanahelo (1997) and on a subsequent interview with them concerning the Hawaiian cultural view of the PTA māmane forest. Because they are concerned with conserving the PTA māmane forest, I have attempted to put their concerns into a larger context, considering the biology of māmane forests in the area more generally. Material on the biology of the forest is based on conversations with Reggie David, an ornithologist who is working on the EIS for the Saddle Road project, and with Jim Jacobi, biologist at the Biological Resources Division, USGS, who has done work on the distribution of māmane on Mauna Kea.

Māmane forest once covered Mauna Kea from about 9600 feet (2950m) down to about 6000 feet (1845m). Figure 2 shows the potential distribution of māmane forest on Mauna Kea. On the southwest side of the mountain, above the present Saddle Road in Pohakuloa Training Area (PTA) and extending up the mountain, the māmane was mixed with naio. On the north side of the mountain, it was mixed with kōa at lower elevations. The māmane forest is the habitat for the pāliia bird, which feeds on its green seed pods. Today, much of the māmane has been eliminated from Mauna Kea by ranching and by wild ungulates and the pāliia is endangered. Grazing by cattle, sheep and goats prevents regeneration of new trees because the ungulates eat the new shoots. In general the māmane is more decimated where there has been ranching of cattle or sheep.

Thus, where the present Saddle Road runs through the Saddle east of PTA (Humu'ula ahupua'a) there is no māmane to be seen, because the many years of sheep ranching there and later cattle ranching have eliminated the forest. (See Fig. 1.) Further west in PTA (Ka'ōhe ahupua'a), the Saddle Road runs on lava flows along the south and west edge of a nice-looking māmane-naio forest until the road reaches the Pohakuloa cantonment and Bradshaw airfield. Presumably the forest persisted there because Ka'ōhe was less used for sheep grazing than Humu'ula. The forest here has been designated as critical habitat for the pāliia, although the bird does not live in the area at present. The PTA māmane-naio forest is subject to grazing by feral ungulates and to use by military vehicles for training exercises, both activities which are detrimental to the forest. The ungulate grazing is causing a gradual shift in the balance of trees, away from the māmane and toward the naio. West from the Pohakuloa cantonment and the airfield in Pohakuloa Training Area (still Ka'ōhe ahupua'a) the māmane has been eliminated in the Saddle area where the road runs. Farther upslope on Mauna Kea, however, there is a good stand of māmane-naio, particularly the section designated as the Ka'ōhe Game Management Area on the west side of Mauna Kea which is the main home of the pāliia at present.

The Federal Highway Administration (1997: 3-179) is proposing to mitigate potential impacts of the Saddle Road Improvement Project on the pāliia critical habitat (māmane forest) if the PTA-1 alternative is used for the Saddle Road by enhancing the forest elsewhere on the island as habitat for the pāliia. The PTA-1 alternative would use 102 acres of the māmane-naio forest for the roadway. In return, under the



proposed mitigation plan, three tracts (at Pu'u Mali, Ka'ohu Game Management Area, Kīpuka 'Ālailā) totalling nearly 10,000 acres in the Mauna Kea/Saddle area are to be fenced to exclude ungulates and allow regeneration of the māmānā and create viable habitat for the palila. Several regulatory agencies must agree to the tradeoff, including the U.S. Fish and Wildlife Service, the Biological Resources Division of the USGS and the Hawai'i State DLNR.

The Kanahahele and Kanahahele report (1997: 13-16) describes the PTA māmānā forest east of the Pōhaku area as a remnant of the old growth forests which formerly covered most of the upper elevations of Hawai'i Island--the kūloa, "mountain slopes" and then the wāōkūa, "upper-level forest inhabited by the gods." The old growth forests lay above the regions heavily used by Native Hawaiians--the wāōkūa, "lower-level forest frequented by man" and then the kūla, "open country." Before Hawai'i's landscape was altered by the introduction of cattle, sheep and goats, and the beginning of ranching, the boundary between wāōkūa and wāōkanaka was around 2500 to 3000 feet elevation (770 to 925m), the upper limit for growing banana and for canoe-making (see Fig. 4 in the body of this report). Traditionally, Hawaiians respected the old growth forests of the kūloa and the wāōkūa (such as the PTA māmānā forest) and avoided disturbing them, seeing them as important to attract rain, to provide seeds to regenerate the forests lower down in the wāōkanaka and to provide a home for the spirits (inā kinilakūa). The PTA māmānā forest is seen as particularly important:

The mamane forest as shown in "Exhibit D & E" is very old and paths the last stand of mamane left. According to the [Hawaiian] hierarchy system the important entity is the food source not the one who feeds off it. The mamane forest is the consideration not the palila. The forest is not mobile and therefore this cultural resource is the focus. (Kanahahele and Kanahahele 1997: 17)

They argue, therefore, that construction of the new Saddle road through the māmānā forest east of the Pōhaku area would have a "negative cultural impact," since it would destroy trees that Hawaiians traditionally respected and avoided cutting. However, they also allow that the Federal Highways Administration proposal to fence three tracts to regenerate māmānā in exchange, would mitigate the negative effect (Kanahahele and Kanahahele 1997: 23).

The māmānā forest in question is evaluated here as not eligible for the National Register of Historic Places as a traditional cultural property, based on the guidelines published in National Register Bulletin 38 (Parker and King 1992). It is true that a natural feature or area may be considered a traditional cultural property under certain conditions.

Thus, a property may be defined as a "site" as long as it was the location of a significant event or activity, regardless of whether the event or activity left any evidence of its occurrence.

A natural object such as a tree or a rock outcrop may be an eligible object if it is associated with a significant tradition or use. (Parker and King 1992: 9)

A number of examples are given in the bulletin of natural features which are eligible as traditional cultural properties. The examples are of two categories. One category consists of features used for traditional subsistence or ritual activities--a sedge preserve used for Pomo basketry, sandbars in the Rio Grande used by Sandia Pueblo folk, the forest of the Helkau Historic District used by various Indian tribes to communicate with spirits. The other category consists of features connected with creation traditions--a mountain in Truk where the societal founder established the first meeting house, Tahquitz Canyon where the Cahuilla ancestors emerged, Goose Egg Hill where a Yakima goddess' heart landed when she was torn apart. In all these cases the natural feature is connected with specific traditional activities carried on by past generations or with specific events in the group's history.

For the PTA māmānā forest in question there is no assertion of specific traditional activities or historic events connected with the PTA māmānā forest either in the Kanahahele and Kanahahele report or in my interview with the Kanahaheles. Likewise, no traditional Hawaiian cultural activities connected with the forest were mentioned by any other Native Hawaiian informants interviewed during work on the Saddle Road Project. The only historic activity mentioned was the use of māmānā wood for fence posts in the Saddle area, both by Parker Ranch and by the Civilian Conservation Corps in the 1930s. Following the Kanahahele and Kanahahele report, it may be agreed that the forest has value to Native Hawaiians according to their traditional cultural values, but the assertion of generalized respect for forests is not a sufficient reason to designate this forest as a traditional cultural property. Moreover, this generalized respect would apply to all upland forests in Hawai'i. The concept of "traditional cultural property" was surely intended to protect specific sites of traditional cultural importance and not as a general zoning tool.

## Part II. Mauna Kea

### Introduction

The evidence and the issues involved in considering Mauna Kea as a traditional cultural property and the effects of the Saddle Road improvement project on Mauna Kea are very complex. That is partly because there are many specific Hawaiian cultural sites on Mauna Kea to be considered and evaluated and partly because Mauna Kea is already being managed by various state entities--the Institute for Astronomy, an arm of the University of Hawai'i, and the several divisions of the Department of Land and Natural Resources. Arguably, the Hawaiian cultural sites on Mauna Kea are





during the period allocated for research (January to June 1998), despite considerable effort at networking through Native Hawaiian organizations and despite the placement of ads in the Hawai'i Island newspapers requesting assistance.

#### Kupuna X

Kupuna X learned about Mauna Kea from his great-grandparents. They taught him that there were two sites of ritual importance on Mauna Kea, the summit peak and Lake Wai'au, together with Pu'u Wai'au which surrounds it. The summit peak was used "in the early days" as a place to go and pray to the gods for mana, to cleanse the person and give him health. It was used especially for first-born children. Lake Wai'au was used as a place to deposit the navel cords of newborn children to ensure them a long life. Its water has mana, so it was used to purify people and to cure sickness. Kupuna X said that Lake Wai'au needs to be protected from contamination by people bathing in it. In particular, if a menstruating woman bathes in the water it will contaminate the water and make it dangerous to those who use it later.

#### Pualani Kanaka'ole Kanahelo and Edward Kanahelo

Pualani and Edward Kanahelo are widely respected in the Hawaiian community as authorities on Hawaiian culture. Pualani and her sisters are known for the knowledge passed down to them through their mother Edith Kanaka'ole--knowledge of Hawaiian language, of chant and hula kahiko, of Pele and other Hawaiian gods, and of wahi panga (places of traditional cultural importance). They have formed a nonprofit organization, the Edith Kanaka'ole Foundation, to perpetuate traditional Hawaiian culture. Pualani and sister Nalani are the kumu hula of the hālaul hula named Hālaul o Kōkuhi.

The interviews held with the Kanahelos reiterated and sometimes amplified the points made about Mauna Kea in their report for the Saddle Road project (Kanahelo and Kanahelo 1997: 5-9). The statements in the report are based on family teachings and material from Pualani's Hawaiian newspaper story collection. The chants *Mele a Pākū'i* and *'O Hānau ka Mauna a Wākea* describe, respectively, the birth of Hawai'i island from the union of Papa and Wākea, the ancestors of Native Hawaiians, and the birth and "budding upward" of Mauna Kea a mountain named for Wākea. As the first-born of Papa and Wākea, Hawai'i island is the *hiapo*, the respected older sibling of all Native Hawaiians. The mountain of Mauna Kea is the *piko* or origin point for the island, more specifically for its northern half, and therefore is a place of great mana. Because of the mana of the mountain and of Lake Wai'au at its summit, Queen Emma went there to bathe in the water in 1874. She was at that time in competition with David Kalākaua for election as the new *mō'ī* of Hawai'i, after the death of Lunalilo left the throne vacant. According to the newspaper story (Kanahelo and Kanahelo 1997: 9) Kalākaua went to Kaho'olawe (the body of the ocean-god Kanaloa) to bathe in its waters and gain mana; Queen Emma went to Lake Wai'au to bathe in its waters to

purify herself and gain mana. In two interviews, the Kanahelos made further points. First, the whole of Mauna Kea is sacred, a place of mana, from the summit down to the zone frequented by man--not just specific ritual sites. As described earlier, in pre-contact times the upper zones of the island (mountain summits and upper forests) were inhabited by the gods, while the lower zones (lower forests and open country near the sea) were used by Hawaiians. In their view, that means that everything above the lower forest zone is sacred. Of course, much of the upper forest has been eliminated from Mauna Kea today. When pressed to say how much of the mountain deserved protection as a sacred area, Pualani Kanahelo said it should at least include all of the forest reserve area. Second, Mrs. Kanahelo said that all three pu'u, Poli'ahu, Lili'oe and Wai'au, are important religious sites. The pu'u are named for three sister goddesses who are female forms of water, Poli'ahu embodied in snow, Lili'oe in mist, Wai'au in the lake. She said that the pu'u is a place where the goddess manifests herself, just as the gods manifested themselves in *helaui* images. So the pu'u is a good place to pray to, or make requests of the goddess.

#### Kupuna Y and Kealoa Pisciotto

Kupuna Y is a member of a Kona family with ties to Mauna Kea because they are "of the Poli'ahu line" (meaning that Poli'ahu is one of their *'aumakua* or ancestral gods). Her family has passed down traditions regarding Poli'ahu and Mauna Kea. In recent years, they have chosen Kealoa Pisciotto (who works at one of the telescopes on Mauna Kea) as their *kaliu* for worship of Poli'ahu, and their spokesperson concerning Mauna Kea. Ms. Pisciotto has constructed a shrine on Mauna Kea for that purpose and incorporated into it a special stone given her by the family. The material summarized here is based on an initial consultation with the Mauna Kea Coalition that included Ms. McCord and Ms. Pisciotto, on a subsequent interview with Kupuna Y and telephone conversation with Ms. Pisciotto.

Kupuna Y said that she learned about the family traditions regarding Poli'ahu and Mauna Kea from her mother and her great-grandmother. She said that her family traditionally deposited *piko* of their children in Lake Wai'au and buried their dead on Mauna Kea. She herself has never gone up Mauna Kea, but she said that others of her family do go up there. She said further that although her own family is connected particularly to Poli'ahu, Mauna Kea is not only a place for Poli'ahu but for all the Hawaiian gods.

Both Kupuna Y and Ms. Pisciotto said that the whole mountain is sacred. There are traditional shrines (found during archaeological surveys) and traditional ritual areas, including the summit, Pu'u Poli'ahu, Pu'u Lili'oe and Lake Wai'au. But it is appropriate to worship anywhere on the mountain if one is spiritually guided there. Worship shouldn't be limited only to the traditional sites. In fact Ms. Kealoa built her shrine to Poli'ahu at a new place that she was guided to, at about 11000 feet (3075m), just above Halo Pōhaku and close to the Mauna Kea Access Road. She feels it has just as much mana as the traditional places.

Both women are very disturbed that this shrine has been repeatedly desecrated,

and they lay the blame on a member of the staff of Mauna Kea Support Services, Institute for Astronomy. There have been three incidents. The first time the altar was torn down and the stone brought from Kona was taken to the Hilo dump, where it was later found. The second time Ms. Pisciotta was accosted by the staff member at the shrine. The third time the stone was taken again and has not been found.

#### Discussion and Evaluation of Hawaiian Cultural Sites

The ethnographic interview evidence presented above can now be put together with the documentary and archaeological survey work done by McEldowney (1982) and McCoy (1982) and the various sites mentioned can be evaluated as to their eligibility for the National Register of Historic Places.

#### Mauna Kea

Both sets of informants considered above have made explicit statements that the whole upper zone of the mountain was traditionally considered a place of mana. Certainly that conception fits with our knowledge of numerous Native Hawaiian burials on Mauna Kea and of numerous shrines near to the summit. There is documentary evidence of burials on the north and east slopes of Mauna Kea from about 7800 feet (2400m) up to 13,000 feet (4000m) (McEldowney 1982: 8). Mauna Kea may have been chosen as a place for burial because the bones were more safe from disturbance there, as suggested by McEldowney (1982: 9). But it is also likely that they were taken there because of the sacredness of the area. In particular, those families with ties to Poi'ahu or Lili'oe as 'aumakua may have taken their dead there because Mauna Kea was the place sacred to those goddesses. McCoy (1982) found 21 prehistoric shrines in a survey of the summit area, all of them having one or more upright slabs. The bulk of the shrines were at the north edge of the summit plateau at about 13,000 feet (4000m), where the steep mountain slope flattens out. As McCoy (1982: 9-11) notes, the function of these shrines is unknown, they have no connection with an occupational activity like the shrines at the adze quarry, but their number is remarkable. He suggests as one hypothesis, that "The high density shrine area on the edge of the plateau is the lower, northern boundary of an upper mountain god/spirit zone." A later survey conducted by McCoy in 1984 on the eastern and southeastern slopes of Mauna Kea identified 20 additional shrines above 13,000 feet (4000m) (Pat McCoy, personal communication). Within this summit plateau of Mauna Kea are a number of specific named sites as well which are known to a greater or lesser degree as ritual sites, including Lake Wai'au, Pu'u Poi'ahu, Pu'u Poi'ahu and the summit peak. These sites are discussed individually below.

There are some indications of ritual and burial sites below the 13,000 foot (4000m) elevation, but limited survey work has been done lower down. Recent unreported survey work was done by McCoy and McEldowney (personal communication). Survey transects were carried out to the north of the summit and

to the southwest and shrines were found along the transect lines down to 12,000 feet (3700m) or so. Many shrines also occur in the area of the Mauna Kea Adze Quarry, mostly between 12,000 feet (3700m) and 12,700 feet (3900m) (Cordy 1994: 95). In addition there is a single shrine at 10,400 feet (3200m) connected with the adze working site at Hopukani Spring and two shrines at 9500 feet (2920m) near Hale Pōhaku, connected with the Pu'u Kalopeamoā quarry used for making octopus lure sinkers and hammerstones (Corly 1994: 90, 96). Burials are located lower down as well. Burials are known to the northeast of the summit at Pu'u Kanakaleonui at about 9400 feet (2890m) elevation (McEldowney, personal communication) and at 'Iolohachae, Pu'u-o-Kuka'iau and/or Pu'u-o-Kihe at about 8000 feet (2460m) (McEldowney 1992: 8, referring to Boundary Commission testimony). A single burial is known at Pu'u Ahumoa on the west side of Mauna Kea at 7000 feet (2150m) (Cordy 1994: 91, 96).

The author recommends that the whole upper zone of Mauna Kea be evaluated as eligible for the National Register of Historic Places as a traditional cultural property under Criterion A, association with significant historical events, based on the information provided above regarding traditional burials and shrines, on informant statements about its spiritual importance and on continued ritual use. Beliefs in and ritual activities connected with this upper zone go back at least to the time of the great-grandparents of Kupuna X and Kupuna Y. Ritual activities are still being carried out today by practitioner Kealoa Pisciotta. Although Ms. Pisciotta and other Naïvo Hawaiians are concerned about the impact of development for telescopes on Mauna Kea, it can still be considered to maintain its integrity as a place of mana. This report does not attempt to set a boundary where this upper zone begins, whether at 10,000 feet (3040m)-below most of the prehistoric shrines and burials, and below Ms. Pisciotta's recent shrine-or at some other elevation. To the writer, it seems that as a practical matter, for the purposes of nomination to the National Register and protection of the site, the boundary should be a matter for consultation involving the principals--Native Hawaiian organizations and ritual practitioners on one side, the University of Hawai'i and the DLNR on the other.

#### Lake Wai'au and Pu'u Wai'au

Taken together, Lake Wai'au and Pu'u Wai'au which contains it are the best attested specific ritual site at the top of Mauna Kea. Kupuna X was taught that the water of the lake had mana and was used traditionally to purify and heal. The newspaper story noted by the Kanahele's about Queen Emma bathing in the lake water to gain spiritual power in her competition with David Kalākaua bears out the Hawaiian belief in the mana of the lake. Kupuna X and Kupuna Y both describe it as a place where children's navel cords were placed, with the ritual purpose of giving the children long life. Belief in the spiritual power of the lake and ritual activities connected with it go back in time to the time of their great-grandparents and before. The use of the name Wai'au for the lake goes back at least to the nineteenth century. The name Wai'au (presumably Wai'au) was given by elderly Hawaiians testifying to the

Boundary Commission in 1873 and was given by Alexander in 1892 as a "genuine native name" (McEldowney 1982: 14, Table 1-2). Protection of the lake's *mana* is still important to Kupuna X, who indicated that individuals who entered the lake carelessly could contaminate its *mana*. The informants cited above have not spoken much about the *pu'u* which contains Lake Wai'au. However, there is archaeological evidence that the *pu'u* slopes were also ritually important (McEldowney, personal communication). Cairns probably used for burial have been found on the south edge of the *pu'u* and a shrine has been found on the slope above the lake on the north side. Based on the foregoing, the author recommends that Lake Wai'au/Pu'u Wai'au be evaluated as a site eligible for the National Register of Historic Places as a traditional cultural property under Criterion A, association with significant historical events.

#### Summit Peak

The summit peak is known on current USGS maps as Pu'u Wēkiu, but this is not a traditional Hawaiian name for it. Traditionally it was named Pu'u-o-Kūkahau'ula (McEldowney 1982: 14; Boundary Commission Book B: 35). Kūkahau'ula is a particular manifestation of the god Hawaiian god Kū and an *ʻaumakua* for fishermen (Kamakau 1992: 215). The name suggests some ritual association with that god. The first known white explorer to reach the summit, Joseph Goodrich, found a "heap of stones" there (Ellis 1963: 290). This might have been a shrine. Two photos of the summit of Mauna Kea taken during the 1935 Mauna Kea expedition (Bryan 1979: 35) show a heap of rocks which may well be the remains of that shrine. Among the rocks in the photos is a slab of tabular basalt similar to the uprights found in the many shrines described by McCoy (1982: 8). Specific interview evidence regarding use of the summit peak was given only by Kupuna X. Kupuna X stated that the peak was used "in the early days" as a place to go and ask the gods for *mana* and good health, especially for first-born children. Kupuna Y and Kealoha Pisciotto mentioned the summit as a place used traditionally for ritual and a place they wish to protect for future ritual use; but they did not specify that ritual at all.

The author regrets that he cannot recommend that the summit peak be evaluated as a site eligible for the National Register of Historic Places at this time. The information given by Kupuna X does indicate that the summit peak was used as a ritual site prior to 1900. That evidence would make it eligible as a traditional cultural property under Criterion A, association with significant historical events, but it cannot be made public. Native Hawaiians may presently practice rituals at this traditional site, but none have yet been found. Further information should be sought before a definitive evaluation is made. Further inquiry should be made of current ritual practitioners (if such can be found) to determine how to best protect the site for ritual activity.

#### Pu'u Polī'ahu and Pu'u Liliinoa

Relatively little information has been collected about these two *pu'u*. In her

survey of place names at the summit plateau, McEldowney (1982: 13-15, Tables 1.1 and 1.2) found that there is no certain evidence linking the names Polī'ahu and Liliinoa to the two *pu'u* that now bear their names. Certainly Polī'ahu is an old name applied to a place in the summit area according to the testimony given by old residents to the Boundary Commission in 1873. However, it is not certain what feature it named. Kamakau (1961: 17) speaks of Polī'ahu's *spring* at the top of Mauna Kea. One reference in the Boundary Commission testimony speaks of a pond Polī'ahu, another of a *cave* Polī'ahu. McEldowney cites evidence that surveyor W. A. Alexander was the one who attached the name Polī'ahu to what was a "nameless peak" (McEldowney 1982: Table 1-2, Note 2). Liliinoa is not mentioned in the Boundary Commission testimony, except as the resident of the cave Polī'ahu. Kamakau (1992: 285) too speaks of "...the bones of Liliinoa on Mauna Kea where her body was said to have lain for more than a thousand years...." The earliest documented use of Liliinoa for the *pu'u* that now bears its name is by the surveyors Lyons in 1884-91 and Alexander in 1892 (McEldowney 1982: Table 1-2). Of the informants questioned on this, Kupuna Y and Pualani Kanahale believe that the names of Pu'u Polī'ahu and Pu'u Liliinoa are traditional ones and that the two *pu'u* are important as ritual sites for the worship of Polī'ahu and Liliinoa, respectively. Kupuna Y also stated that descendants of both Polī'ahu and Liliinoa buried their dead on Mauna Kea.

At this point, the evidence is suggestive that Pu'u Polī'ahu and Pu'u Liliinoa were traditional ritual sites and that some Native Hawaiians may still use them as ritual sites today. Further information should be sought before a definitive evaluation is made.

#### Kaluakāko'i (adze quarry)

In the nineteenth century, the Mauna Kea adze quarry was known as Keanakāko'i or as Kaluakāko'i (presumably Kaluakāko'i, literally "the cave or pit where adzes are made"). Kaluakāko'i appears earlier, in the Boundary Commission testimony (Boundary Commission Book B: 37, 41). Keanakāko'i appears a bit later, on Alexander's 1892 map (McEldowney 1982: Table 1-2.) Probably both names were used interchangeably, since their meaning is very similar.

The quarry is located in the Mauna Kea Ice Age Natural Area Reserve west of the Mauna Kea Access Road and above Hale Pōhaku. Survey of the site found numerous debitage piles left from adze-making composed mostly of basalt flakes, and a few abandoned adze preforms. (Preforms were apparently chipped out roughly at the quarry and then carried down for final working.) There are also numerous shrines with upright slabs, presumably used by the adze makers in rituals connected with their work, and rock shelters where Hawaiians stayed while working at the quarry (Cordy 1994: 92-100). The quarry covers a large area, lying mainly between 12,000 feet (3700m) and 12,700 feet (3900m) elevation, but with some outlying sites lower down. The Humu'ula-Mauna Kea trail runs through the quarry on the east side.

The adze quarry is listed on the National Register of Historic Sites and is a National Historic Landmark because of its unique status as an archaeological site under

Criterion C. It should be noted that it would also be eligible for the register as a traditional cultural property (under Criterion A, association with significant historical events). The quarry would qualify as a traditional cultural property because there has been sporadic use of basalt from the adze quarry by Native Hawaiians in modern times, which will probably continue. Recently, the Polynesian Voyaging Society collected basalt at the quarry for an adze to carve a kōa sailing canoe (Bill Stormont, personal communication).

#### Discussion

It is recommended that the whole upper zone of Mauna Kea be nominated to the National Register of Historic Places as a historic district. Not only is the whole upper zone evaluated here as eligible for the register as a traditional cultural property, but there are two specific sites within the upper zone which are individually evaluated above as eligible as traditional cultural properties (Pu'u/Lake Wai'au and Kaiuakō'i), as described above. There are three additional specific sites which may be found eligible for the register as traditional cultural properties with further ethnographic work, the summit peak, Pu'u Poli'ahu and Pu'u Lili'noe. Besides those sites, there are also a large number of shrines and burials which have not been enumerated. It is also recommended that the boundary of this upper zone be defined by further consultation between Native Hawaiian organizations and ritual practitioners on one side and the University of Hawai'i and DLNR on the other.

#### Current Management of Mauna Kea

At present, the responsibility for management of Mauna Kea, including its Hawaiian cultural sites, is divided between the State Department of Land and Natural Resources (and its Board) and the Institute for Astronomy (IfA) of the University of Hawai'i. The state Board of Land and Natural Resources leases to the University of Hawai'i the upper section of Mauna Kea, designated the Mauna Kea Science Reserve, for the construction and operation of telescopes (see Figure 3). Individual telescope operators lease sites from the university, and construct and run the telescopes. At present there are twelve telescopes at the summit and a radio antenna called the Very Long Base Array (VLBA) farther down at 12,200 feet (3760m). The science reserve includes the summit area above 12,000 feet (3700m) except for the area included in the Mauna Kea Ice Age Natural Reserve. It also includes the Hale Pōhaku area (19.3 acres, 7.7 ha) which serves as a staging area for astronomy operations, and the road built from Hale Pōhaku up to the summit, along with a corridor 1200 feet (370m) wide on both sides of the road except where it bounds the natural area reserve. Mauna Kea Support Services, part of the IfA, handles certain logistic and maintenance services for the telescope operators and runs the facilities at Hale Pōhaku, including a Visitor Information Station and Elison Onizuka Center for International Astronomy.

There have been a series of management plans instituted since 1977 (Hawaii State Auditor 1998: 4-8), developed by the IfA and approved by the Board of Land and Natural Resources. The 1985 plan gave overall management responsibility of the science reserve to the IfA, but the 1995 plan which superseded it returns overall responsibility to the DLNR to manage public and commercial use (tours) of the science reserve.

#### Commercial Tours

Commercial tour operations are managed by the DLNR Land Division by means of a permitting process. The Board of Land and Natural Resources has authorized twelve permits for tour operations to the summit and at present permits have been given for nine operators (Charlene Unoki, DLNR Land Division, Hilo Office, personal communication). Each operator is allowed to make two trips a day, using a vehicle that carries 13 passengers and a driver; a maximum of eighteen tour vehicles may be at the summit at any one time (Revised Management Plan, 1995). The operators must comply with certain conditions or have their permit revoked. A reading of the permits indicates that these conditions include the requirements to register at the Visitor Information Station on the way up, to report to the DLNR Land Division their monthly total of visitors carried, to keep the summit area "in a clean, sanitary and orderly condition," to form a Tour Operators Association and to refrain from leading tours to the adze quarry. Ms. Unoki of the DLNR Land Division, Hilo office, said that the tour operators are also supposed to avoid taking tours to Lake Wai'au because of its status as a cultural site mentioned in the Revised Management Plan (1995: 5), although that condition is not clearly stated on the permits. At present none of the tour operators is running close to the maximum number of tours allowed (Unoki, personal communication; confirmed by inspection of DLNR files). Doug Arnott, who runs Arnott's Lodge and Hiking Adventures, one of the bigger tour operators to the Mauna Kea summit and secretary of the tour operators association, was interviewed about his operations. Arnott's run three standard tours a week to the summit (one vehicle), and occasional special tours. The standard tour stops at the Visitor Information Station and then goes up to the summit, past the telescopes. The driver stops at the summit to let the group hike up to the summit peak. If the weather is clear, the vehicle goes up to the top of Pu'u Poli'ahu on the road built there for a view of Lake Wai'au. Then the tour returns. The main effects on Hawaiian cultural sites would be from the tourists who hike up the summit peak and the vehicles which drive up Pu'u Poli'ahu, which could be disturbing to ritual practitioners who use those sites. Mr. Arnott said that he and the other tour operators know that they are not permitted to take visitors to Lake Wai'au.

Two of the permit holders are set up to take skiers during periods of snowfall at the summit. The effects of the ski tours are perhaps greater than those of the regular tours, which mostly stick to the road. The ski tours are required to use "designated staging areas" according to the terms of the permits, but no inquiry was otherwise made into the nature of the tours.

#### Private Vehicles

DLNR also has overall responsibility for management of visitors who come up Mauna Kea in private vehicles. Within the science reserve, visitors who come by private vehicle are allowed access during the day to do skiing, hiking on existing roads and trails, hunting, and "cultural activities" so long as they do not involve physical impact (Revised Management Plan 1995: 4-5). The Natural Area Reserve System (NARS) has jurisdiction over Lake Wai'au and the Mauna Kea Adze Quarry, which fall into the Mauna Kea Ice Age Natural Area Reserve. The reserve is supervised by Bill Stormont at the Hilo office of the DLNR Forestry and Wildlife Division. Forestry and Wildlife also has jurisdiction over the rest of the Mauna Kea Forest Reserve. However, they have no personnel on Mauna Kea. Certain management responsibilities have been given to the University of Hawaii'i. Above Hale Pohaku, the university can prohibit two-wheel drive vehicles when conditions are hazardous and can install a barrier to prevent access during nighttime hours (Revised Management Plan 1995: 8, 12). Since there are no DLNR personnel on Mauna Kea, monitoring for violation of regulations is done by personnel of Mauna Kea Support Services, (especially the staff of the Visitor Information Station) and by those who work at the telescopes (personal communications from Ron Koehler, Bill Stormont, Keoloha Pisciotta). In the event of a report of a violation to regulations (such as swimming in Lake Wai'au, driving offroad or disturbing an archeological site), Forestry and Wildlife informs the Division of Conservation and Resources Enforcement (DOCARE) to handle the violator, but there are no DOCARE personnel on Mauna Kea either so enforcement is difficult.

The university handles education of visitors at the Visitor Information Station, including giving advice on safety, and statements of the rules which prohibit hiking offtrail or driving offroad and prohibit disturbing the adze quarry and swimming in Lake Wai'au (personal communication from Hugh Grossman, staffer at the Visitor Information Station). Visitors are advised by sign to stop at the station, but at present it is only staffed from Friday through Sunday. (Beginning in June the staffing was to increase to Thursday through Monday.) In addition there are signs posted which tell visitors not to drive offroad, not to disturb the landscape, not to build rock piles. There seems to be little attempt to notify visitors about the Hawaiian cultural status of Mauna Kea as a place of spiritual power or of the cultural importance of specific ritual sites like Lake Wai'au.

An attempt was made to gauge the number of private vehicle visitors who currently come up to the summit and their effect on Hawaiian cultural sites by conversations with Ron Koehler, Director of Mauna Kea Support Services, and with Bill Stormont who supervises the NAR. Ron Koehler (personal communication) estimated that there are over a hundred vehicles coming up to the summit every day, two-thirds of them astronomers and one-third visitors (both local and off-island). The majority of visitors come in two-wheel drive cars, the minority in four-wheel drive commercial or private vehicles. The visitors do a limited amount of hiking according to Mr. Koehler: many of them hike the short distance from the road up to the summit peak; perhaps twelve visitors a week hike to Lake Wai'au; few hike to the adze

quarry; very few hike north from the summit to the area where most of the shrines are.

According to Mr. Stormont (personal communication) he is notified only three to four times a year by university personnel of violations in the NAR, about violations such as graffiti seen at the adze quarry, off-road vehicles, hang-gilding from Pu'u Keonehehe'e. Mr. Stormont said he was also aware that hikers occasionally take adze blanks or rocks from the quarry. In the 1970s there was a road open from the Mauna Kea Access Road to Lake Wai'au, and at that time visitors often swam in Lake Wai'au. Since the road was closed in the 1980s that happens rarely. The present monitoring system appears to have only a limited ability to notice violations of the rules protecting Hawaiian cultural sites. The telescope personnel would usually be concentrating on their jobs, and not looking for violations. The Visitor Information Station is not staffed fulltime. Moreover, the main cultural sites in the NAR, the adze quarry and Lake Wai'au, are not visible from the Hale Pohaku or the telescope sites where university personnel work or from the Mauna Kea Access Road.

#### University Personnel

The personnel of Mauna Kea Support Services are supposed to play a positive role in managing Hawaiian cultural sites, but there is some evidence that they sometimes have played a negative role so far as Native Hawaiian ritual practitioners are concerned. The main issue here is whether Native Hawaiians are free to build rock shrines on Mauna Kea and under what conditions. The 1995 Management Plan does not directly address this issue, as regards the science reserve. It states only that "Cultural activities which are otherwise consistent with this plan and do not involve physical impacts are permitted (Revised Management Plan 1995: 5). Mauna Kea Support Services had assumed that this meant that no building of rock piles (which would include Native Hawaiian-built shrines) was allowed. They have installed signs which warn against disturbing the landscape and building rock piles. They have also removed rock piles, assuming they were built by tourists (Ron Koehler, personal communication). Mr. Koehler stated on May 1, 1998, that after they received a complaint that a shrine built by a Native Hawaiian had been removed, they changed the policy. The present policy is that they do not restrict the building of rock shrines by Native Hawaiians and will no longer remove rock piles. But Mr. Koehler would like to receive some direction from Native Hawaiian community on this policy. This statement conflicts with the perception of Keoloha Pisciotta, the builder of the shrine, as described on page 9. At the least, this indicates a need for the IFA to engage in active consultation with Native Hawaiian organizations to resolve the problem.

with Native Hawaiian ritual practitioners, beyond what has been done in this study, in order to complete evaluation of Hawaiian cultural sites, and additional consultation with Native Hawaiian organizations to determine how best to manage them and mitigate adverse effects due to the existing situation. By way of mitigation, the IFA could do more to educate visitors about Mauna Kea as a place of spiritual importance to Hawaiians, which deserves their respect. This could include installation of additional signs and provision of more information at the Visitor Information Center. Probably the IFA should also take more responsibility for preventing damage to Hawaiian cultural sites. It could fund a DOCARE position for an individual stationed at Hale Pōhaku with responsibility to monitor effects on Hawaiian cultural sites and apprehend violators of regulations. The measures just discussed seem to me to be part of the responsibility of the IFA under the present system. They should only be introduced after consultation with Native Hawaiian organizations. IFA would be well advised to also consult with Native Hawaiian ritual practitioners such as Ms. Pisciotta who wish to build shrines on Mauna Kea and find a way to facilitate their practice.

#### Effects of the Saddle Road Improvement Project and Mitigation

Under the current management of access, the Saddle Road Improvement Project would be likely to increase in a minor way the traffic going up the Mauna Kea Access Road to Hale Pōhaku and to the summit. Under a revised management regime which restricted visitor access, the project would not increase traffic up to Hale Pōhaku and the summit. Survey research concerning traffic on the Saddle Road and the Mauna Kea Access Road has been carried out by Ron Terry, a consultant for the Saddle Road EIS (personal communication). Most Hawai'i island residents (about 80%) currently use the Saddle Road, despite its substandard condition. A smaller group travels up Mauna Kea on the more difficult Mauna Kea Access Road. A two-day survey of vehicles that stopped at Hale Pōhaku was carried out, which polled 49 parties. Most of the visitors were people who visit Mauna Kea several times a year, a group of "regular users." Mr. Terry argues that increase in traffic up to the summit area once the Saddle Road is improved would come mostly from this group of regular users. The survey at Hale Pōhaku also asked how the Saddle Road improvement project would affect the frequency with which they visit Mauna Kea. Of the 49 parties polled, 22 were uncertain if they would visit more often, 23 said their number of visits would stay the same, four indicated that they would visit more often. This indicates that only a minor increase in traffic to the summit would be likely to result from the Saddle Road improvement project.

It has been argued that there are adverse effects at present on various Hawaiian cultural sites eligible for the National Register of Historic Properties due to visitor traffic, mainly due to the private vehicle visitor traffic. Mitigation measures which could be instituted by IFA, visitor education and funding a DOCARE position at Hale Pōhaku, would reduce these present adverse effects but wouldn't totally eliminate them. With a slight increase in visitor traffic when the Saddle Road improvement project is built, adverse effects would likely increase slightly on all the sites under consideration.

#### Assessment of Effect and Discussion of Mitigation

##### Effects of the Current Situation

Only a preliminary exploration has been made here of the effects of the present roadway access system--the unimproved Saddle Road and Mauna Kea Access Road--under the present management regime carried out by the university and the DLNR. However, it seems clear that it results in adverse effects on Hawaiian cultural sites which are evaluated here as eligible for the National Register of Historic Places (Lake Wai'au/Pu'u Wai'au) or which have already been placed on the register (Mauna Kea adze quarry). There is a low level of visitor traffic to the Mauna Kea adze quarry which results in some disturbance of the archaeological sites, moving and removal of adze blanks and graffiti. Likewise there is a low level of visitor traffic to Lake Wai'au, which sometimes leads to swimming in lake by individuals who are not properly prepared and who may spiritually pollute the lake from the point of view of Native Hawaiians. There is a much higher level of visitor traffic to the summit peak. Because the summit peak is a traditional place for rituals, the visitor traffic would probably create an adverse effect on ritual practitioners who wished to practice there. However, this is not confirmed as an adverse effect because no ritual practitioner was located who currently uses the summit peak.

The present management regime and roadway access system also impact Pu'u Poli'ahu and Pu'u Lihono, potentially eligible for the National Register of Historic Places as specific sites. More broadly, it also impacts the whole upper zone of the mountain, evaluated here as eligible for the National Register as a historic district. There is considerable vehicle traffic to Pu'u Poli'ahu because it is used as a viewpoint by tour operators. Probably that would create an adverse effect for ritual practitioners wished to carry out rituals at Pu'u Poli'ahu, due to the noise of the vehicle and the likelihood of an unwanted audience. But again this is unconfirmed because no ritual practitioner was located who currently uses Pu'u Poli'ahu. In considering the impact on the upper zone of the mountain, the most obvious effect to consider is the effect on ritual practitioners such as Kealoa Pisciotta who build shrines at "new" locations, locations to which they are spiritually led. The most disturbing adverse effect has been the repeated destruction of Ms. Pisciotta's shrine, which she attributes to IFA personnel.

##### Toward Mitigation of Adverse Effects of the Current System

It is not strictly the role of the present study to recommend mitigation treatment for the adverse effects of the roadway access and management regime now in place. However, it seems obvious that mitigation of ongoing adverse effects needs to be considered first, before mitigation of the potential effects of the Saddle Road Improvement Project. The university is currently beginning work on a new management plan for the Mauna Kea Science Reserve which will likely alter the management regime by the year 2000; the Saddle Road Improvement Project will not be completed for eight to ten years. Clearly, the IFA needs to do additional research

to mitigate those adverse effects cannot really be addressed before the adverse effects of the present situation are addressed and the University of Hawai'i's new management plan is created. Consideration of the effects of visitors on Mauna Kea and of mitigation to reduce adverse effects properly resides within the context of a Section 106 (National Historic Preservation Act) process relating to planned actions of the IFA and DLNR within the Mauna Kea Science Reserve, not the Saddle Road project.

Finally, it is important to reiterate that this ethnographic study is only a contribution toward understanding the Hawaiian cultural significance of Mauna Kea and how to mitigate adverse effects on Hawaiian cultural sites there. It is not an exhaustive study of the Hawaiian cultural sites on Mauna Kea. A further search for ritual practitioners needs to be carried out and further information needs to be sought, particularly for the summit peak, for Pu'u Poli'ahu and Pu'u Lili'oa. In my view an exhaustive study would require a larger effort and should properly be the responsibility of the state agencies responsible for managing Mauna Kea--the University of Hawai'i and the DLNR.

More visitors would hike and might impinge on rituals. A certain percentage of the additional hikers would presumably move adze blanks at the quarry, swim in Lake Wai'au, disturb shrines and otherwise harm properties, just as the present group of hikers does.

The easiest way to mitigate the effects of increased traffic due to the Saddle Road Improvement Project would be to limit access above Hale Pōhaku by the general public in some way. It would be simple to limit access by commercial tours simply by changing the permit conditions. Access by private vehicles could be limited in various ways--by disallowing access by two-wheel vehicles, or by instituting a quota on the number of private vehicles admitted per day for recreational purposes. Private vehicles admitted for Hawaiian cultural or religious purposes could be exempted from the recreational quota. Although limiting public access would be an easy solution, it cannot be recommended at this point because it is not very acceptable to Native Hawaiians, and probably not to the general public either. Limiting public access was explored in consultation with Native Hawaiian organizations, but they did not agree that it is a good idea. Some saw the suggestion to limit public access by private vehicles as a proposal that would work to the benefit of IFA but counter to Native Hawaiian interests. An atmosphere of distrust exists on the part of Native Hawaiians toward the IFA which makes it difficult to discuss such mitigation measures with Native Hawaiians.

The first mitigation measure should be to address the adverse effects caused by the present road system and management regime by improving visitor education, monitoring and enforcement of regulations. The second step of limiting visitor access to the mountain above Hale Pōhaku should not be taken except as a last resort, only if visitor traffic increases substantially and only with the agreement of the concerned Native Hawaiian organizations. The position taken here is that it is premature to assess effects due to the Saddle Road Improvement Project and to consider mitigation of adverse effects due to the project, since those effects depend on the management policies put in place by DLNR and the University of Hawai'i, policies that are currently being reconsidered. The adverse effects due to the Saddle Road improvement project seem small compared to the adverse effects being created by the deficiencies in the present management regime for the Mauna Kea summit area. Mitigation measures to deal with visitor traffic to the Mauna Kea summit have been considered here, but that mitigation is more properly seen as the responsibility of the DLNR and the University of Hawai'i than of the agencies which are undertaking the Saddle Road improvement project.

#### Conclusion

Lake Wai'au and Pu'u Wai'au, and the whole upper zone of the mountain have been evaluated here as eligible for the National Register of Historic Places. The Mauna Kea Adze Quarry has already been placed on the register. Effects of federal projects on all those sites should therefore be assessed. However, consideration of the adverse effects that may be created by the Saddle Road Improvement Project and how



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Two untaped interviews.
- Koehler, Ronald (Director of Mauna Kea Support Services)  
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- McCoy, Pat and Holly McEldowney  
Personal communications during tours of Mauna Kea.
- Pisciotta, Kealoaha  
Personal communication (telephone conversation).
- Stormont, Bill (DLNR, Division of Forestry and Wildlife, Hilo office, supervises the Mauna Kea Ice Age Natural Area Reserve)  
Personal communication (telephone conversation)
- Unoki, Charlene (DLNR, Land Division, Hilo office)  
Personal communication (two telephone conversations)

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1982 Ethnographic Background of the Mauna Kea Summit Region. Cultural



**Fax Cover**

Date: 5 January 1999

U.S. Department of the Interior  
U.S. Geological Survey

Pages including this cover: 3 pages

To: Mr. Bert McCauley

US Dept. of Transportation, Federal Highways Adm.  
Central Federal Lands Div, Lakewood CO 80228

Fax: (303) 969-5903 Phone: ( )

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lives and property from

natural disasters,

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energy resources, to

enhance and protect

the quality of life, and

to contribute to wise

economic and

physical development.

From: Paul Banko

U.S.G.S. - Biological Resources Division

Email: paul\_banko@usgs.gov

Mailing address: U.S.G.S. - Biological Resources Division

Kilauea Field Station

P.O. Box 44/Bldg. 344

Hawaii Volcanoes National Park, HI 96718

Fax: (808) 967-8568 Phone: (808) 967-7396 ext.235

Message: Bill Steiner asked me to transmit the attached  
comments on the Saddle Road EIS to you because  
he is traveling.



**U. S. Department of the Interior**  
**U. S. GEOLOGICAL SURVEY**  
**BIOLOGICAL RESOURCES DIVISION**  
**PACIFIC ISLAND ECOSYSTEMS RESEARCH CENTER**  
 3190 Kalia Way, St. Johns # 408  
 Honolulu, Hawaii 96822  
 (808) 956-5668 FAX (808) 956-5687



5 January 1999

Mr. Bert McCauley  
 U.S. Department of Transportation  
 Federal Highways Administration  
 Central Federal Lands Division  
 555 Zang Street  
 Lakewood, CO 80228

Dear Mr. McCauley:

The final Environmental Impact Statement prepared by your office for the Saddle Road (Hawaii State Route 200) comprehensively presents results of biological surveys, considers major problems which may result from the proposed realignment and improvement of Saddle Road, and suggests adequate and appropriate mitigation measures.

I appreciate that you and others associated with the project consulted extensively with biologists knowledgeable about palila and their habitat requirements. Biologists who have spent the past ten years investigating palila life history and limiting factors are confident that the mitigation plan is appropriate. If implemented properly, it will enhance the recovery of palila on Mauna Kea. Furthermore, the plan should provide impetus to federal and state agencies to develop and implement a comprehensive plan to recover palila and its habitat elsewhere in its historical range, including Mauna Loa and Hualalai volcanoes. Without this mitigation, it is difficult to say when more significant recovery actions might be initiated.

I am pleased that the mitigation plan appears in the final EIS in the same basic configuration as when it was conceived among biologists and resource managers. Because its content and form remain intact, biologists familiar with palila conservation problems can continue to endorse it. I thank you and other associated with the planning of the project for taking our concerns and suggestions seriously and for facilitating the development of the mitigation plan.

Because mitigation for palila has been carefully considered during the past several years of planning and preparing the final EIS, I have confidence that Federal Highways Administration (FHWA) will continue to provide responsible oversight and coordination of the mitigation. Although it is not clearly stated (for example, Part 1, p. 3-189, 4<sup>th</sup> paragraph), I understand that USGS-Biological Resources Division (BRD), US Fish and Wildlife Service (USFWS), US Army Garrison, Hawaii (USAG-HI) and Hawaii Division of Forestry and Wildlife (DOFAW) will act in an advisory capacity to FHWA during the implementation of the mitigation.

I would like to offer some suggestions that may clarify issues regarding hiring a fire ecologist and designating the mitigation lands on Mauna Kea. With regard to the fire ecologist, there were

discrepancies in the text (for example, Part 1, p. 3-192, p. 3-197) and Table 3.18.3.1 (Part 1, p. 193-195) concerning what agency would be responsible for hiring and supervising. The text indicates that the fire ecologist would be hired by USAG-HI from Pohakuloa Training Area EMP funds, whereas the table indicates that BRD would be responsible for hiring. During the 30 June 1998 multi-agency meeting at the Turtle Bay Hilton, I understood that BRD would assume responsibility for hiring the fire ecologist. It is my intention to maintain the fire ecologist on mitigation funding for three years (FY2000-2002), before switching the position to BRD base funds to continue with work on Mauna Kea and other dry woodlands. I believe there is relevancy and need for a fire ecologist within BRD and have included such a position in my organizational planning.

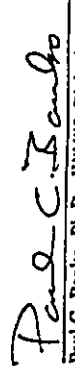
I also encountered some confusion in the EIS about how proposed mitigation lands on Mauna Kea were designated. The problem stems from the use of "Ka'ohi lease" lands, especially in conjunction with "Pu'u Maki" (for example, Part 1, p. 3-197, 2<sup>nd</sup> paragraph; p. 3-198, 2<sup>nd</sup> & 4<sup>th</sup> paragraphs). Ka'ohi is a large land division which occurs around much of Mauna Kea and includes mitigation lands on the western and northern slopes. Ka'ohi lease lands on the western slope are adjacent to Ka'ohi Game Management Area and Mauna Kea Forest Reserve, where palila are concentrated. Consequently, we believe that palila will naturally recolonize this mitigation area as habitat conditions there improve, and they will not require active reintroduction from the adjacent area. However, palila will require active reintroduction to the forest reserve just above Pu'u Maki and the Ka'ohi lease lands on the northern slope. As habitat conditions improve on northern Ka'ohi lease lands designated for mitigation, palila which become reestablished in the forest reserve through relocation will eventually move down into this area. Therefore, it is confusing to indicate that palila must be relocated to Ka'ohi lease lands on either the western or northern slopes. It might be better to refer to mitigation lands on "northern" and "western" slopes instead of referring to "Ka'ohi" lands.

In addition, I found a small error which creates some minor disorientation. Pu'u Lau (= La'au) is reported (Part 1, p. 3-180) to be 1 km uphill of the project area when, in fact, it is about 4.6 km uphill from Saddle Road.

Again, I thank you for allowing BRD to assist you and others in developing a mitigation plan. If implemented as intended, the mitigation plan will considerably assist the recovery of palila, its habitat, and associated species. It also provides for much needed fire management of the unique dry forest that supports palila and many other endemic species. Finally, it is noteworthy that the plan does not exclude the public from lands intended to be managed for palila. Indeed, the plan would enhance sport hunting and other opportunities for the public to enjoy their natural resources.

Sincerely,

  
 William W. M. Steiner, Ph.D., Center Director  
 (for WWMS)

  
 Paul C. Danko, Ph.D., Wildlife Biologist



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

655 Zeng Street, Room 259  
Lakewood, CO 80228-1103

*B. McCauley*

**JAN 07 1999**

In Reply Refer To:  
HRD-161E/Saddle Road

Mr. Raynard Soon, Chairman  
Hawaiian Homes Commission  
12th Floor, Ali'i Place  
1099 Alakea Street  
Honolulu, Hawaii, 96813

Dear Mr. Soon:

Subject: Memorandum of Agreement for Saddle Road Project A-AD-6(1)

As you know, the Saddle Road Final Environmental Impact Statement (EIS) is scheduled to be completed and available to the public in March of this year. One of the requirements of Section 106 of the National Historic Preservation Act (NHPA) is that the lead agency, in this case the Federal Highway Administration (FHWA), must develop and execute, in consultation with appropriate agencies and organizations, a Memorandum of Agreement (MOA) detailing how the effects of the proposed action upon historic sites will be mitigated. This MOA must be executed by the responsible parties, with concurrences as appropriate, and included in the Final EIS.

We have completed our discussions with the State Historic Preservation Division on the content and wording of the MOA and are transmitting herewith a draft copy of the final document for review by the Department of Hawaiian Homelands (DHHL). We are interested in any comments that the Commission may have on the MOA so that we may secure DHHL's signature of concurrence for final processing of the document and inclusion in the Final EIS.

Representatives of FHWA will be available at your convenience to make any necessary presentations to the appropriate staff or the Commission prior to consideration of the document for concurrence. If requested, we would like to make this presentation as soon as possible in light of the project schedule.

Should you have any questions about the document or the Final EIS process, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 716-2141. Thank you for assistance in advancing the Saddle Road Project.

Sincerely yours,

*151*

James W. Keeley, P.E.  
Project Development Engineer

Enclosures

cc (w/enclosures):

Hanna Springer, Vice-Chairperson, OHA, 711 Kapiolani Boulevard, Suite 500,  
Honolulu, HI 96813  
Michael D. Wilson, SHPO, Dept. of Land and Natural Resources, State Historic  
Preservation Division, 33 South King Street, 6th Floor, Honolulu, HI 96813  
Mary Ann Naber, Historic Preservation Specialist, Advisory Council on Historic  
Preservation, 1100 Pennsylvania Ave., NW, Suite 809, Washington, DC 20004  
Alexis Lunn, Executive Assistant, Office of Senator Daniel K. Inouye,  
300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850  
Kenneth Au, Advance Planning Engineer, Hawaii DOT, 600 Kapiolani Boulevard,  
No. 301, Honolulu, HI 96813  
Merrill Deskins, Environmental Specialist, FHWA, Region 9, 201 Mission Street,  
Suite 2100, San Francisco, CA 94105  
Abraham Wong, Division Administrator, FHWA, III Division, Prince Jonah Kuliio  
Kalani'ao'ole Federal Bldg., 300 Ala Moana Blvd., Rm. 3202, Honolulu, HI 96850  
Tom Wolfarth, Projects Manager, Paul H. Rosendahl, Inc., 204 Wai'anae Avenue,  
Hilo, HI 96720  
Nancy Burns, Senior Project Engineer, Okalaha & Assoc., 73-5574 Maiau Street,  
Bay 6B, Kailua-Kona, HI 96740  
Curt Cottrill, Na Ala Hale, Hawaii Division of Forestry & Wildlife, Dept. of Land and  
Natural Resources, 1151 Punchbowl Street, Honolulu, HI 96813

bc (w/ enclosures):

D. Geddon  
R. Cushing  
B. McCauley

yc: reading file

Central file - HI A-AD-6(1), Saddle Road  
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U.S. Department  
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Federal Highway  
Administration

**Central Federal Lands Highway Division**

555 Zang Street  
Lakewood, CO 80228  
(303) 716-2141  
Fax: (303) 969-5903

**FAK TRANSMISSION COVER SHEET**

Date January 7, 1999  
To Sec Addressee List  
Fax Various  
Subject Saddle Road Project  
Revised Section 106 Memorandum of Agreement  
Sender Bert McCauley

5 PAGES TOTAL TRANSMITTED. IF NOT RECEIVED CALL (303) 716-2141.

Transmitting revised MOA pursuant to comments received by OHA, ACHH, HHDOT, and in consideration of current MOA's on other Federal-Aid projects in Hawaii. This MOA will be discussed at the meeting of January 13 among OHA, FHWA, and HHDOT. This MOA is also being transmitted to the Department of Hawaiian Home Lands (property owner at several site locations) in an invitation to comment.

Address	Fax Number
Mary Ann Nabar, ACHH*	(202) 606-5072
Lynn Lee, OHA	(808) 594-1865
Ken Au, HHDOT	587-1787
Don Hubbard, SHPO	692-8020
Glenn Yasui, FHWA	541-2704
Toni Wolford, FHWA	961-6998
Nancy Burns, O&A	329-1006
Bill Moore, O&A	934-0162

From The Desk Of:  
Bert McCauley, P.E.  
Environmental Project Manager  
Central Federal Lands Highway Division  
555 Zang Street  
Lakewood, CO 80228  
(303) 716-2141  
(303) 969-5903 FAX

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01/09/99 18:58 FAX 808 5704 5704

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STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
HIGHWAYS DIVISION  
RIGHT-OF-WAY BRANCH  
901 KAUOLA BOULEVARD, 8th FLOOR  
KAPOLEI, HAWAII 96761

JAN 7 1999

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JAN 08 1999

OKAMURA ASSOC. INC.  
HONOOLULU OFFICE

Ms. Nancy M. Burns, P.E.  
Senior Civil Engineer  
Okamura & Associates, Inc.  
200 Kohala Street  
Elio, Hawaii 96720

Dear Ms. Burns:

Subject: Saddle Road Improvements, Island of Hawaii  
Project No. 200A-E-01-98

In response to your letter, dated November 24, 1998, regarding the estimate as to how long it will take to produce right-of-way maps, please address the following concerns:

- Map will do the topo?
  - The State currently maps only in east and not west.
- If you have any questions, please call Joyce Toy at (808) 592-7336.

Very truly yours,

*Thomas M. Toyama*  
THOMAS M. TOYAMA  
Right-of-Way Manager

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US Department  
of Transportation  
Federal Highway  
Administration

# Memorandum

Date: January 27, 1999

**Subject:** Saddle Road Project A-AD-6(1)  
Historic Linear Features  
Phone Conversation with Terry Martin of DOI

**From:** Environmental Project Manager  
Lakewood, Colorado

**To:** Project Files

This is to document a conversation held at 8:30 A.M. MST this date with Mr. Terry Martin, Office of the Secretary, Policy and Environmental Protection, Department of Interior, Washington D.C. (202-208-5465) regarding the intent of the Section 4(f) comments in the February 12, 1998 letter from DOI commenting on the Draft EIS for this project.

Mr. Martin was responding to an e-mail regarding these comments sent to him on January 25 (see attached). He informed me that the comments referenced were provided by the National Park Service to his office and that they usually make specific comments regarding specific sites if there is a Section 4(f) concern. It was his understanding that the comments from NPS were not requesting a 4(f) evaluation; however, they were requesting coordination with the SHPO to ensure that all possible planning had been done to these sites and that this coordination was documented in the Final EIS. He clarified that the wording referencing the inclusion of a 4(f) evaluation in the Final EIS was not a requirement but simply a reference to including a determination explanation and documentation of coordination with SHPO in the FEIS.

I asked Mr. Martin if he could furnish a letter clarifying this position and he replied that this would be difficult to do since he would have to go back through NPS and ask them for a detailed review again. He indicated that, since there were no detailed comments forthcoming from the NPS in the DEIS review, that the intent of their review was clear; i.e., they agree with our "no 4(f) determination". He also indicated that such a request to the NPS would be time consuming and could confuse the issue further. I explained to Mr. Martin that we intended to expand on our "no 4(f) determination" on a site by site basis in the FEIS and document our coordination with the SHPO, OHA, and DHIHL in a signed MOA. He said this would accommodate their needs very well. We both agreed that we would document our conversation with the e-mail attached and place the documentation in our respective project files.

Bert McCauley, P.E.

SCHAUN L. CANTERANO  
GOVERNOR OF HAWAII



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION  
Kalihihewa Building, Room 555  
801 Kalia Boulevard  
Honolulu, Hawaii 96813

REF:HP-AMK

FFR 53 1999

Mr. Larry Smith, Division Engineer  
Federal Highway Administration  
US Department of Transportation  
555 Zang Street/P.O. Box 2546  
Denver, Colorado 80225-0246

Dear Mr. Smith:

**Subject:** Review of Supplement to: *Archaeological, Historical and Traditional Cultural Property Assessment for the Hawai'i Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project* (Langlas, July 1998).  
South Kohala, Hamakua, North Hilo, South Hilo Districts, Hawaii Island

LOG NO: 22778 ✓  
DOC NO: 98121M03

MICHAEL B. WILSON, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES

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AQUATIC RESOURCES  
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CONVEYANCES  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND  
LAND USE PLANS  
WATER RESOURCE MANAGEMENT

Thank you for submitting for our review the ethnographic report prepared as a supplement to that already submitted for Section 106 compliance for the Hawai'i Defense Access Road and Saddle Road Project (*Archaeological, Historical and Traditional Cultural Property Assessment for the Hawai'i Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project*, Langlas, Wolforth, Head and Jensen, 1998). Our office requested this supplement because it felt that two areas, the *mamane* forest and Mauna Kea itself, could meet the criteria for listing in the National Register of Historic Places as traditional cultural properties and that both could be affected, directly and indirectly, by the proposed highway project. The need to evaluate those two areas was prompted by information presented in a report prepared for the project's EIS by Puaiani and Edward Kanahelo (*A Hawaiian Cultural Impact Assessment of the Proposed Saddle Road*, 1997) and subsequent discussions between the Kanahelos and SHPD staff members Don Hibbard and Nathan Napoka. Our office asked that this additional ethnographic work gather sufficient information to determine if the two areas met National Register criteria as traditional cultural properties following the guidelines set out in National Register Bulletin No. 38 and, if they were significant historic properties, that the report explore the potential effect of the project on these properties and recommend appropriate treatment.

The supplemental report is divided into two discrete parts. The first addresses the potential eligibility of the *mamane* forest as a traditional cultural property. It appears insufficient information is known at this time to determine if the *mamane* forest on Mauna Kea meets the criteria for listing in the National Register.

The second part discusses the cultural significance of Mauna Kea and its eligibility to the National Register as a traditional cultural property. The report concludes that two properties, Lake Waiapu'u Waiou and the Mauna Kea Adze Quarry, qualify as traditional cultural

properties, and that two other potential properties, Pu'u Lili'inoe and Pu'u Poihahu, need additional study. The study concludes the summit peak appears to meet the criteria for listing in the National Register (page 18, see page 15 also). The author proposes that the "upper zone" of Mauna Kea would be eligible for listing in the National Register as a traditional cultural property and recommends that it be nominated as an historic district to incorporate the large number of other historic properties in the summit region (i.e., shrines and burial areas).

The report then thoroughly examines possible impacts of the Saddle Road improvements on the potential historic properties discussed. Examined are the current uses of the summit region which might change as a result of the Saddle Road improvements (i.e., commercial tours, private vehicles, university personnel), the known or potential impacts of these uses on historic properties, and measures that could mitigate these effects. The author concludes that visitor traffic to the summit region and any adverse effects attributed to this traffic would probably increase only marginally due to improvement of the Saddle Road, but such assessments of effect are difficult to isolate and address when the current uses, their impacts, and any mitigation are dependent on current management policies of the two agencies, the Institute for Astronomy (IfA) and the Department of Land and Natural Resources (DLNR), which have jurisdiction over the summit region. He recommends that the most effective measure to mitigate potential increases in vehicle traffic and visitation would be restricting access above the Hale Pohaku Mid-Level Facility in addition to other general measures such as "improving visitor education, monitoring and enforcement."

We concur with the report's findings on Mauna Kea. The study contributes to our understanding of cultural traditions and practices associated with Mauna Kea and effectively addresses some of the contemporary concerns of native Hawaiian practitioners. The analysis of potential effects that could result from increased visitor numbers and traffic in the summit region is a useful contribution to the Management Plan and Historic Preservation Plan currently being prepared by the IfA and DLNR.

We have also reviewed Appendix I and concur that consultation with Native Hawaiian organizations appears to have been conducted and documented adequately.

We had a number of specific comments on the report which are discussed in Attachment 1. If you have any questions, please call Holly McEldowney at 692-8028.

Aloha,



DON HIBBARD  
Deputy State Historic Preservation Officer

HM:amk

c. Dr. Charles Langias, Consulting Ethnographer

**Attachment 1**  
**Specific Comments**  
**Supplement to: Archaeological, Historical and Traditional Cultural Property**  
**Assessment for the Hawai'i Defense Access Road A-AD-6(f) and Saddle Road**  
**(SR 200) Project (Langias, July 1998)**

p. 8, para 1. In regard to the distribution of prehistoric shrines, several sentences give the impression that most of the shrines are on the northern slope. The northern slope and a portion of the western slope were the only areas surveyed in 1982 so this characterization represents a sampling bias and could be misleading if not qualified. The paragraph after this rightly characterizes the shrines as extending below the 13,000 ft elevation based on recent, unreported surveys, but neither paragraph characterizes the 1984 survey conducted by McCoy under a grant-in-aid from National Science Foundation, the 1984 survey covered the eastern and southeastern slopes and identified 20 additional shrines. Based on all the surveys conducted thus far, it is safe to say that shrines have been found in varying numbers and density, over much of the plateau region surrounding the cluster of cones that form the summit. The author can cite this as a personal communication from Pat McCoy.

p. 11, para. 4. We are not aware of any Conservation District Use Permit being obtained by the Polynesian Voyaging Society to collect basalt from the Adze Quarry. We know of only one incident in which individuals affiliated with a project associated with the Polynesian Voyaging Society collected basalt from the quarry. This was done without the appropriate permits and after-the-fact compliance was needed.



BERNARD J. CATELANO  
GOVERNOR OF HAWAII



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION  
Kalahele Building, Room 555  
611 Kalia Road  
Honolulu, Hawaii 96819

THOMAS E. JOHNS, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
MEMBER  
JANET E. MARSH

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
CONVEYANCES  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND USE  
LAND USE PERMITS  
WATER RESOURCE MANAGEMENT

February 23, 1999

Mr. Thomas Wolforth  
Paul H. Rosendahl Inc.  
204 Waiannuenu Avenue  
Hilo, Hawaii 96720

Dear Mr. Wolforth:

Per discussions held on February 18, 1999, between Bill Moore, Bert McCauley, yourself and myself, our office concurs with the Department of Transportation that for the purposes of the Saddle Road Project sites 20864, 20855, 5002, 10309, 21150, and 7119, situated in the project's area of potential effect, appear to meet the criteria of significance for placement in the National Register of Historic Places. They appear to be significant in accordance with criteria D.

I would appreciate your refining the significance section of the inventory report as we discussed. Please provide our office with a copy of these replacement pages by March 3, 1999.

Thank you for your time and effort.

Aloha!

Don Hibbard  
Deputy State Historic Preservation Officer

DH:jk

BERNARD J. CATELANO  
GOVERNOR OF HAWAII



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION  
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LAND USE PERMITS  
WATER RESOURCE MANAGEMENT

March 3, 1999

Mr. Thomas Wolforth  
Paul H. Rosendahl Inc.  
204 Waiannuenu Avenue  
Hilo, Hawaii 96720

Dear Mr. Wolforth:

In the letter of February 23, 1999, pertaining to the Saddle Road Project (Log No. 22876), two sites, 20870 and 20878 were inadvertently omitted from the list of sites that appeared to be eligible for listing in the National Register of Historic Places in accordance with criteria D.

Please pardon the oversight.

Aloha!

Don Hibbard  
Deputy State Historic Preservation Officer

DH:jen

LOG NO: 22911  
DOC NO: 9903DH01

LOG NO: 22876  
DOC NO: 9902dlh04

A. McCauley



US Department  
of Transportation  
Federal Highway  
Administration

# Memorandum

555 Zang Street, Rm. 259, Lakewood, CO 80228

**Subject:** INFORMATION: Hawaii, Defense Access Roads  
HIA-AD-6, Saddle Road  
Environmental Mitigation, Final EIS

**Date:** MAR 11 1999

**Reply to**

**Attn. of:** HPD-16

**From:** Division Engineer (HFL-16)  
Lakewood, CO

**To:** Mr. Arthur E. Hamilton, (HFL-1)  
FHII Program Administrator  
Washington, DC

Reference is made to a June 30, 1998, Palila Mitigation partnering meeting for the Saddle Road Defense Access Road (DAR) Program project to support the Pohakuloa Training Area (PTA) in Hawaii County, Hawaii. At this meeting, the signatory parties to the resulting Memorandum Of Understanding (MOU) discussed alternatives for implementing and funding mitigation measures required by the Final Biological Opinion (BO) of the United States Fish and Wildlife Service (USFWS) for the Saddle Road preferred alternative of PTA-1 through palila Critical Habitat within the PTA. The executed MOU (attached) identified items necessary for implementation of the complete mitigation plan for the palila, their estimated cost, and various general and specific commitments by the signatory parties. The MOU included a commitment that appropriate agencies would implement items related to their programs with funds appropriated for this purpose. Further consultation with the signatory parties resulted in a refinement of potential funding sources and responsible agencies (see attached Table A).

As required by 23 CFR 771.109(b), it is the responsibility of the Federal Highway Administration (FHWA) to ensure that mitigation commitments stated in the environmental documents for this project are implemented. The palila mitigation requirements are an integral part of the Saddle Road project as determined by the BO issued by the USFWS and; therefore, the responsibility of the project. Accordingly, the FHWA must have a "reasonable assurance" that this required mitigation can be implemented prior to proceeding with a Record of Decision for the project based upon the realigned PTA-1 alternative through federally designated Critical Habitat. The extensive nature of the mitigation (resulting from the Endangered Species Act, Section 7, formal consultation with the USFWS) is based upon the unprecedented taking of Critical Habitat for the realignment and the cumulative impacts from increased access to the Pohakuloa Flats area which was planned for future habitat restoration and bird relocation efforts.

While the segment of Saddle Road through PTA was agreed to be the funding responsibility of the Department of the Army because of the benefits to the quality and safety of training, another major purpose of the total Saddle Road improvement project is to provide an efficient and safe

cross-island road for the Big Island. Because of the multiple purposes for the entire project, the Department of the Army has maintained that responsibilities for the entire mitigation cost should be equitably divided among other agencies based upon those agencies' involvement in the implementation and the benefits derived to their ongoing programs. Consequently, at the above referenced partnering meeting, it was agreed that the DAR Program would pay for roadway related fire prevention and suppression measures and the acquisition of necessary rights-of-way (ROW) for replacement habitat. The Biological Resources Division (BRD) of the U.S. Geological Survey (USGS) and the U.S. Army Garrison-Hawaii (USAG-HI) agreed that they would attempt to secure appropriations through their existing programs for other items of the required mitigation, as shown in the attached Table A.

In discussions related to securing appropriations for palila mitigation implementation within existing research programs, the BRD/USGS has determined that, because of changes in their budgeting processes and organizational structure, it will not be possible for them to pursue such funding. This leaves the commitment to mitigation funds short by approximately \$6.0 million (of the estimated \$14.0 million total mitigation) that will have to be funded through other sources. Attached is a letter from Dr. Bill Steiner, Director of BRD, to U.S. Senator Daniel K. Inouye's staff explaining this situation and suggesting that the DAR Program would be the best way to fund the total mitigation requirement. In a discussion with Senator Inouye's staff, they are in agreement that funding through BRD is not a feasible alternative. The inability of BRD/USGS to pursue funding for some items of the palila mitigation will result in necessary changes to the executed MOU and the environmental documentation for the project.

The options available to continue to advance the project include:

1. Providing the requisite funding for the total mitigation package for the PTA-1 alternative through the DAR program, either in lump sum or through annual construction appropriations;
2. Providing the requisite funding for the "non-DAR" mitigation items for the PTA-1 alternative through USAG-HI annual appropriations for the Ecosystem Management Program (EMP);
3. A combination of options one and two;
4. Proceed with studies, including re-initiation of Section 7 consultation, to validate the selection of a realignment alternative outside of Critical Habitat which meets most of the Army's requirements (formerly referred to as PTA-6); or,
5. Select the EX-2 alternative along the existing alignment.

The final option would also require re-initiation of Section 7 consultation. However, baseline studies would not have to be completed as they would with option number four.

In options one, two, and three, it would be necessary, at a minimum, to have all funds allocated for the first year mitigation commitments (shown in Table A currently as FY 2000) before construction could begin. Options four and five would most likely result in different mitigation requirements; however, the same funding caveat would apply. Presently, refinements are being investigated for the land transfer and all fencing costs in the first year mitigation requirements

for PTA-1 in order to develop more accurate estimates for use in appropriation considerations. These refinements are being pursued so that if off-site palila mitigation funds are appropriated for the USAG-III EMP, these monies could be tagged for specific items, as indicated in Table A.

I know the Military Traffic Management Command (MTMC) has significant issues with funding the additional mitigation requirements for this project. However, to change alignments at this time could cause significant public objection and certainly would not meet a substantial part of the purpose and need for the project from the Army's perspective. We believe that funding option number three, noted above, is the most likely avenue to keep this project on a positive path. This option would require the Army to fund an additional \$6.0 million for the project, about \$1.5 million of which would be required in FY 2000. The additional \$6.0 million could be obligated over time from the construction dollars allocated each year in order to fund the total 10 year mitigation commitment. In this manner, FHWA could ensure implementation of the mitigation commitment consistent with construction efforts and the mitigation implementation schedule shown in Table A.

In order to proceed with the project through the Final EIS and ROD stages with the Army's preferred realignment alternative, PTA-1, the means for implementing the required palila mitigation will need to be determined and a reasonable assurance that these funds will be available must be provided. In order to initiate discussions with other signatory parties to the MOU, we need to clarify the Army's position and intent regarding this latest development in the palila mitigation implementation process. Accordingly, we request your early support in securing MTMC's review and comment so this issue may proceed toward resolution.



Larry C. Smith, P.E.

Attachments

cc (w/attachments):  
Ms. J. Sabas, Esq., Office of U.S. Senator Daniel K. Inouye, 300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850  
Mr. Kazu Hayashida, Director, HDOT, 869 Punchbowl St., Honolulu, HI 96813  
Mr. Peter Cline, MTMC, Attn: MTTT-SA, 720 Tiumble Shoals Blvd., Suite 130, Newport News, VA 23606  
COL. Darryl N. Tolten, Directorate of Public Works, Building 104, Wheeler Army Airfield, USAG-III (APVG-GW), Schofield Barracks, HI 96857  
LTC David Hergenroeder, HQ, PTA, USAG-III, Bldg. T-180, Milepost 36, H200 (Saddle Road), Hilo, HI 96720  
Mr. Abraham Y. Wong, Division Administrator (IAD-III), FHWA, Box 50206, Honolulu, HI 96850

bc (w/attachments):

L. Smith  
J. Keeley  
C. Actis  
D. Geddon  
R. Cushing  
J. Rippley  
B. McCauley

yc: reading file

Central File: III A-AD-6, Saddle Road  
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BMC



DEPARTMENT OF THE ARMY  
MILITARY TRAFFIC MANAGEMENT COMMAND  
TRANSPORTATION ENGINEERING AGENCY  
1720 TRIMBLE SQUARE, FOLLERSVILLE, ROUTE 130  
NEWPORT NEWS, VIRGINIA 23894-2874

April 1, 1999

Office of Special Assistant  
for Transportation Engineering

Mr. Arthur E. Hamilton, P.E.  
Federal Lands Highway Program Administrator (HFL-13)  
Federal Highway Administration  
Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590

Dear Mr. Hamilton:

Reference your March 19, 1999, letter regarding mitigation of environmental impacts for the Saddle Road Defense Access Road (DAR) Program project to support the Pohakuloa Training Area (PTA), Hawaii. Some \$14 million worth of mitigation has been identified for impacts to the designated Palila Bird Critical Habitat caused by the proposed realignment of Saddle Road at PTA. Funding for this mitigation was to be pursued by the Department of the Army (DA) and the U.S. Geological Survey (USGS), as agreed to at a June 30, 1998, Palila mitigation partnering meeting. Your letter states the USGS will not pursue funding of their approximately \$6 million share for palila mitigation. You recommend the Army obtain all mitigation funding for the proposed project.

We recognize that environmental mitigation required for a highway project generally is funded by the agency sponsoring the project. However, in this case, State and other federal agencies had developed a palila recovery plan prior to the proposed DAR project. The plan was to enhance the critical habitat and reintroduce/monitor the bird on the Big Island to ensure its survival. While construction of Saddle Road through PTA is eligible for funding through the DAR Program, when included in the funding priorities of DA, the major purpose of the total Saddle Road improvement project is to provide an adequate cross-island road for the general motoring public. This will significantly increase nondefense generated traffic on Saddle Road and consequently increase the threat to the palila. For these reasons, at the June 30, 1998, meeting, the USGS agreed to pursue funding of critical habitat enhancement, bird reintroduction and monitoring, on the non-Army property.


We are disappointed the USGS has now determined it will not pursue funding for its portion of the mitigation and other federal agencies will not assume responsibility to fund implementation of portions of their palila recovery plan. While we maintain others should help pay for the extensive palila mitigation, we recognize that the project cannot be

-2-

constructed until mitigation money is identified. Therefore, we will allow funding of mitigation required for this project (if not identified in other agency appropriations) from appropriated DAR construction funds either before or during roadway construction. Unfortunately, DA has only \$36 million programmed in Fiscal Year 2004 for this project that is now estimated to exceed \$60 million. We will continue to request DA program appropriate funds for this DAR project. With this information, please continue with the Final Environmental Impact Statement and execution of a Record of Decision.

If you have any questions, please contact me or Mr. Peter Cline at (757) 599-1117.

Sincerely,

  
T. D. Collinsworth  
Special Assistant for  
Transportation Engineering



Central Federal Lands  
Highway Division

555 Zeno Street, Room 259  
Denver, Colorado 80228

APR 21 1999  
In Reply Refer To:  
A-AD-6(1), Saddle Road

Mr. Timothy E. Johns, Director  
Department of Land & Natural Resources  
1151 Punchbowl Street  
Honolulu, HI 96813

Dear Mr. Johns:

Subject: State Replacement Lands for Saddle Road Palila Mitigation

At our meeting on February 18 we discussed the Federal Highway Administration's (FHWA) coordination with the Department of Land & Natural Resources (DLNR) in the development of the Saddle Road Project. At that time we indicated we would provide you with information regarding our participation in the transfer of four state pasture leases from agricultural to conservation use for palila mitigation lands. It is our desire to work with your department and the lessees from a common base in order to avoid misunderstandings about what is allowable under Federal law. We realize that some amount of initial discussion has already taken place among your department, our consultants, and the lessees; however, this letter is intended to form the basis for initiating closing discussions along common grounds.

The acquisition of property and the displacement of people for all Federal projects are governed by the *Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970*, as amended (URA). The purpose of this law is to provide uniform treatment of all parties impacted by a project designed for the benefit of the public as a whole. In the case of the Saddle Road Project, we are obligated to pay for any interest in the Palila mitigation site that we acquire and to provide relocation assistance to the lessees currently occupying the property. If the State is obligated to pay the lessees for any improvements made to the leased property, this would also be considered in the acquisition of any interest in the property.

In order for us to compensate the State for the loss of use of these lands for leasing purposes, it will be necessary for us to secure an interest in the Palila mitigation site. A conservation easement or some other similar land conveyance document for a period not to exceed 10 years (project mitigation period) will be sufficient to guarantee the use of the lands by DLNR pursuant to the Interagency Palila Mitigation Memorandum of Understanding (MOU). The payment would be based upon the fair market value of the easement as it encumbers the land and should serve to compensate the State for the loss of lease income for the 10 year time period. The property would be appraised for this purpose and the appraisal reviewed in accordance with the requirements of the URA.

2

If the State does not wish to convey an interest in the property for the project, but is willing to provide the land for use solely in terms of the MOU, we would be happy to receive an interest in the land on this basis through an interagency agreement. However, there would be no mechanism to provide compensation for loss of lease income.

In either case, the tenants are eligible for reimbursement of reasonable expenses for vacation of the property under the relocation provisions, as well as any required payment for improvements to the property. Compensation for improvements would consist of payment for the permanent improvements (buildings, wells, new fences, etc.) made to the properties by the leaseholders in accordance with the terms of the leases. It is worth noting that ordinary maintenance operations such as repairing existing fencing or roads would not be treated as permanent improvements eligible for compensation.

The relocation provisions for each tenant cover the actual, reasonable, and necessary costs of: 1) Moving all personal property (equipment, portable structures, livestock) located on the acquired lands to a replacement site; 2) Searching for a replacement site for the displaced operation; and 3) Re-establishment of the operations at a new location, based on necessary costs and limited to a maximum of \$10,000. In lieu of these actual cost payments, the tenants may be eligible for a fixed payment of up to \$20,000 for the loss of their farm operations. This payment is based on the average of the income from the operation for two consecutive years, as reported on income tax reports, or other reliable documentation of income. This payment is made after the property is vacated by the tenants.

We look forward to beginning our discussions with you on this issue, based on these guidelines. We have every intention of working toward an amicable, expedient solution for all parties involved in the palila mitigation requirements for this project; however, we must emphasize that, because this is a Federal project, we are bound to the URA in all of our negotiations. Also, no appraisals, negotiations, or document execution can be initiated until we have issued a Record of Decision (ROD) presenting the PTA-1 alignment within the Pohakulua Training Area, as the selected alternative. We are expecting to complete a ROD for the project in July or August of this year.

For your review, we are enclosing two pamphlets which discuss various aspects of the Uniform Act. If you have questions or would like to discuss any aspect of this issue further, please contact Mr. Bert McCauley, Environmental Project Manager, at (303) 716-2141.

Sincerely yours,

James W. Keeley, P.E.  
Project Development Engineer

Enclosures

BENJAMIN L. CANTILANO  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
HISTORIC PRESERVATION DIVISION  
KALANIANA'OLE BUILDING, ROOM 555  
901 Kalia Boulevard  
Honolulu, Hawaii 96813

THOMAS E. PRIME, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
DEPUTY  
JIMMY C. BUNYON

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
CONSERVATION AND RESOURCES  
DEVELOPMENT  
CONVEYANCE  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND  
STATE PARKS  
WATER RESOURCE MANAGEMENT

May 4, 1999

Mr. Larry Smith  
Federal Highways Administration  
Central Federal Lands Highway Division  
555 Zang Street  
Denver, Colorado 80228

Dear Mr. Smith:

This letter transmits the Memorandum of Agreement for the Saddle Road (SR 200) and Hawaii Defense Access Road (AAD61) Improvement Project on the Island of Hawaii, which has been signed by Kazu Hayashida and myself as Deputy State Historic Preservation Officer.

FIHWA and SIPO have consulted pursuant to the section 106 requirements as stipulated in 36 CFR 800. The three reports entitled "The Saddle Road Corridor: An Archaeological Historical and Traditional Cultural Property Inventory Survey, evaluation and Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project" (the Archaeology Report); "The Supplemental Traditional Cultural Properties Assessment" (the TCP Supplement); and the Draft Environmental Impact Statement, Saddle Road (State Route 200), Mamalahoa Highway (State Route 190) to Milepost 6, Technical Appendix Volume V, Social Impact Assessment, Appendix B: Indigenous Hawaiian Cultural Values" (the Cultural Values Report) have provided the appropriate identification, significance evaluation, and determination of effects for the archaeological sites in the project area of potential effect (APE).

The State Historic Preservation Office (SIPO) has reviewed the TCP Supplement and has concurred with the findings of the report regarding Mauna Kea. Consultation with native Hawaiian organizations, as contained in the reports, was conducted and documented adequately. SIPO requested that two changes be made and have subsequently received the revised TCP Supplement. For purposes of the Section 106 review and consultation, the TCP Supplement is complete and accepted at this time.

The significance evaluations for the archaeological sites within the APE have changed over the course of the project. Initial recommendations for significance were provided in the Archaeological Report, which was submitted in April 1997. In a letter dated July 31, 1997, SIPO requested that significance evaluations be reconsidered. The revised Archaeological Report


incorporated that suggestion, and this was documented in a letter from FIHWA dated September 23, 1997.

The FHWA September 23, 1997 letter also reiterated the position concerning the appropriate mitigation to lessen the effects of impacts to the archaeological sites within the project APE. SIPO concurs that the project will impact small portions of several long, linear sites; however the removal and documentation of those small segments will not significantly impair, alter or diminish the sites' attributes which make them eligible for the National Register of Historic Places (NRHP). Consequently, preservation in place for those portions of these sites is not warranted.

SIPO reinforced its view on the matter outlined above in a letter dated February 23, 1999, to the FIHWA's archaeological subconsultant regarding project impacts. The list of sites mentioned in that letter, and expanded to include other relevant sites in a March 3, 1999 letter, are long, linear archaeological sites which will be minimally impacted by the project. These site areas within the APE (7119, 10309, 20855, 20864, 20870, 20878, and 21150) appear to meet only criteria D for listing in the National Register. Data recovery and the interpretive treatments specified in the MOA are appropriate and sufficient mitigation.

SIPO has reviewed the revised Archaeological Report that has incorporated the requested changes. The report can be considered acceptable contingent upon revising the text to reflect the changes to the criterion of eligibility as expressed in our previous correspondence.

Aloha

  
Don Hibbard  
Deputy State Historic  
Preservation Officer



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

455 Zang Street  
Denver, Colorado 80226

**JUN 03 1999**

In Reply Refer To:  
HPD-16.5/Saddle Road

Mr. Timothy E. Johns  
State Historic Preservation Officer  
Department of Land & Natural Resources  
1151 Punchbowl Street  
Honolulu, HI 96813

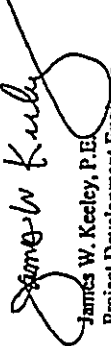
Dear Mr. Johns:

As you are aware, the Federal Highway Administration has been working with Mr. Don Hibbard, Deputy SHPO, and representatives of the Office of Hawaiian Affairs, Hawai'i Department of Transportation, and the Advisory Council on Historic Preservation to develop a Memorandum of Agreement (MOA) to guide mitigation to archaeological sites from impacts occurring from the Saddle Road Project. Inclusion of an executed MOA in the Final Environmental Impact Statement (EIS) is required to document compliance with the Section 106 requirements. We appreciate Mr. Hibbard's assistance in helping us do this in a timely manner.

Accordingly, we are enclosing herewith a copy of the fully executed MOA for your records. We will also provide each of the DLNR's divisions with a complete copy of the Final EIS for the project in the near future.

Thank you for your assistance in advancing this project. Should you have any questions on this or any other aspect of the project, please contact Bert McCauley, Environmental Project Manager, at (303) 716-2141.

Sincerely yours,

  
James W. Keeley, P.E.  
Project Development Engineer

Enclosure

cc (w/enclosure):

Lynn J. Lee, Land Planner, Office of Hawaiian Affairs, 711 Kapi'olani Boulevard, Suite 500,  
Honolulu, Hawai'i, 96813-5249  
Kenneth Au, Advance Planning Engineer, Hawaii DOT, 600 Kapi'olani Boulevard, No. 301,  
Honolulu, HI 96813  
Abraham Wong, Division Administrator, FHWA, HI Division, Prince Jonah Kuhio  
Kalanihanoale Federal Bldg., 300 Ala Moana Blvd., Rm. 3202, Honolulu, HI 96850

cc: (w/o enclosure):  
Haana Springer, Vice-Chairperson, OIIA, 711 Kapi'olani Blvd., Suite 500,  
Honolulu, HI 96813  
Mary Ann Naber, Historic Preservation Specialist, Advisory Council on Historic  
Preservation, 1100 Pennsylvania Ave., NW, Suite 809, Washington, DC 20004

be (w/enclosures):  
D. Gedton  
R. Cushing  
B. McCauley  
yc: reading file  
Central file - III A-AD-6(1), Saddle Road  
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MEMORANDUM OF AGREEMENT  
Among the  
ADVISORY COUNCIL ON HISTORIC PRESERVATION  
and  
FEDERAL HIGHWAY ADMINISTRATION  
and  
HAWAII STATE HISTORIC PRESERVATION OFFICER

Regarding the Saddle Road (SR 200) and  
Hawaii Defense Access Road (A-AD-6-1) Improvement Project on the  
Island of Hawaii, Hawaii

DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION  
APR 30 1 16 PM '99

WHEREAS, the Federal Highway Administration (FHWA) has determined that the proposed Saddle Road (SR 200) Improvement Project from Kaunama (at Milepost 6 on Saddle Road) to the intersection of Saddle Road with the Mamalahoa Highway will have an effect on 20 historic properties (Final Environmental Impact Statement, Section 3.19) which by consensus determination appear to meet the criteria for listing on the National Register of Historic Places (NRHP), and have consulted with the Hawaii State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470b); and

WHEREAS, the Hawaii SHPO has reviewed and concurred with the evaluations and recommendations provided in the report entitled *The Saddle Road Corridor: An Archaeological, Historical, and Traditional Cultural Property Inventory Survey, Evaluation and Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project* and with the *Supplemental Traditional Cultural Properties Assessment* prepared to address issues presented in the *Draft Environmental Impact Statement, Saddle Road (State Route 200), Mamalahoa Highway (State Route 190) to Milepost 6, Technical Appendix Volume V, Social Impact Assessment, Appendix B: Indigenous Hawaiian Cultural Values*, and;

WHEREAS, the Hawaii SHPO has acknowledged that data recovery of the portions of the seven linear archaeological sites impacted by the recommended alternative (Attachment 1) is appropriate mitigation, and;

WHEREAS, Mauna Kea, as described in the Supplemental Traditional Cultural Properties Assessment to The Saddle Road Corridor: An Archaeological, Historical, and Traditional Cultural Property Inventory Survey, Evaluation and Assessment for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project appears to meet the criteria for placement on the NRHP as a Traditional Cultural Property (TCP) as defined by National Register Bulletin Number 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties*, U.S. Department of the Interior, National Park Service, and;

WHEREAS, the effects of the Saddle Road Project on Mauna Kea are indirect, and mitigation of any potential effects can best be addressed as part of the University of Hawaii's (UH) new management plan for Mauna Kea, and;

WHEREAS, the State of Hawaii Department of Transportation (HDOT) and the Office of Hawaiian Affairs (OHA) have been consulted in preparation of this Memorandum of Agreement (MOA), and concur with the stipulations contained herein;

NOW, THEREFORE, the Council, FHWA, and SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

STIPULATIONS

FHWA shall ensure that the following measures are carried out:

1. FHWA shall develop and implement an archaeological Data Recovery Plan for those sites indicated on Attachment 1 that is consistent with the Secretary of the Interior's *Standards and Guidelines for Archaeological Documentation* (48 CFR 44734-37) and takes into account the Council publication, *Treatment of Archaeological Properties*, and the SHPO minimal standards for archaeological data recovery and interim protection. The Data Recovery Plan will:

- Identify sites that require data recovery (see Attachment 1).
- Present research context and questions to be addressed during data recovery, with an explanation of their relevance and importance,
- Specify methods to be used, with reference to their relevance to the research questions,
- Establish how and to what agencies and interested organizations or individuals the plan will be distributed,
- Provide procedures for consideration of comments on the plan from those to whom it was distributed,
- Specify procedures for interim protection through archaeological monitoring of work during construction, as applicable to specific sites,
- Itemize contents of the Data Recovery Report (Report),
- Indicate Report review procedures to be followed,
- Provide a Report completion date,
- Establish procedures by which agencies and interested organizations or individuals will be provided with a summary of the Report findings and how they will be notified when the work is beginning.

FHWA shall submit the Data Recovery Plan to the SHPO and OHA for a 30 day review period. Unless the SHPO has specific concerns to procedures, methods, and treatments outlined in the plan within 30 days after receipt and responds in writing, the FHWA may assume SHPO concurrence. If SHPO objects to the Data Recovery Plan within 30 days of receiving the plan, it shall be revised as applicable and submitted for another 30 day review period. OHA shall provide written comments on the plan to the FHWA within the 30 day review period. FHWA will consult with OHA as necessary to address all comments. In the absence of comments received by the FHWA from OHA within the 30 day review period, the FHWA may assume concurrence by this agency.

2. FHWA shall ensure that all archaeological materials and records are curated by an institution acceptable to the SHPO in accordance with 36 CFR Part 79.



3. FHWA shall develop and implement a Treatment Plan for interpretative mitigation of designated sites (Attachment 1). Efforts will be made to design the proposed roadway footprint to minimize impact to the sites. Portions of the sites that cannot be avoided during construction will be included within the data recovery activity and incorporated into the Data Recovery Plan outlined above. The Treatment Plan shall include:

- A list of agencies and interested organizations or individuals to whom the plan will be distributed for review,
- Procedures for consideration of comments on the plan from those to whom it was distributed,
- A brief description of the project location and roadway design in the site vicinity,
- A brief summary of previous archaeological research performed in the vicinity,
- Schematic maps locating the site and depicting the roadway design and treatments, and
- Separate subsections describing the scope of the treatment methods for data recovery, interim protection by archaeological monitoring as applicable, preservation methods for remaining site features as applicable, and roadway design features and interpretive aids applicable to enhancing the site.

FHWA shall submit the Treatment Plan to the SHPO and OHA for a 30 day review period. Unless the SHPO has specific concerns to procedures, methods, and treatments outlined in the plan within 30 days after receipt and responds in writing, the FHWA may assume SHPO concurrence. If SHPO objects to the Treatment Plan within 30 days of receiving the plan, it shall be revised as applicable and submitted for another 30 day review period. OHA shall provide written comments on the plan to the FHWA within the 30 day review period. FHWA will consult with OHA as necessary to address all comments. In the absence of comments received by the FHWA from OHA within the 30 day review period, the FHWA may assume concurrence by this agency.

4. The Federal Highway Administration agrees to cooperate with the UH in planning for access restriction facilities or signage at the intersection of Mauna Kea Access Road and Saddle Road by providing design or Right-of-Way accommodations as might be reasonably considered part of the Saddle Road Project at the time the project is advanced.

5. If a previously unknown archaeological site is encountered during project construction, the FHWA shall notify the Hawaii SHPO and OHA immediately. The FHWA shall ensure that all work ceases in the area of the discovery and in any adjacent areas where associated resources are likely to be encountered. The FHWA, Hawaii's SHPO and OHA shall then consult on the potential significance of the resource and appropriate treatment measures. The Hawaii's SHPO and OHA shall participate in such consultation in an expedited manner consistent with the timely advancement of the project with the intent of minimizing construction delays. When agreement has been reached on data recovery, interim protection, preservation, or interpretive measures and such measures have been implemented, construction may proceed in the area of the discovery.

6. Should any signatory or concurring party to this agreement object to a proposed Data Recovery Plan or Treatment Plan within the 30 day review period pursuant to this agreement, the FHWA shall consult with the objecting party to resolve the objection. If the FHWA determines that the objection cannot be resolved, the FHWA shall forward all documentation relevant to the

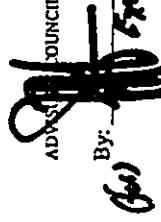
dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will:

- Provide the FHWA with recommendations to be considered in reaching a final decision regarding the dispute, or
- Notify the FHWA that it will comment pursuant to 36 CFR 800.6(b), and proceed to comment.


Any Council comment provided in response to such a request will be considered by the FHWA in accordance with 36 CFR 800.6(c)(2) with reference to the subject of the response. Any recommendations or comments provided by the Council will be understood to pertain to the subject of the dispute; however, the FHWA's responsibility to carry out all actions under this agreement that are not subject to dispute will remain unchanged.

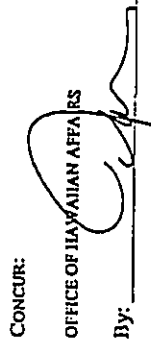
7. Any party to this MOA may request that it be amended, where upon the parties will consult in accordance with 36 CFR 800 to consider such amendment.

Execution of the MOA and the implementation of its terms evidence that the FHWA afforded the Council an opportunity to comment on the Saddle Road (SR 200) Improvement Project and its effects on historic properties, and that the FHWA has taken into account the effects of the undertaking on historic properties.

By:  Date: 5/11/97  
 ADVISORY COUNCIL ON HISTORIC PRESERVATION

By:  Date: 5/11/97  
 FEDERAL HIGHWAY ADMINISTRATION

By:  Date: 5/12/97  
 STATE OF HAWAII HISTORIC PRESERVATION OFFICER

By:  Date: 5/12/97  
 OFFICE OF HAWAIIAN AFFAIRS  
 HAWAII DEPARTMENT OF TRANSPORTATION

ATTACHMENT I

Mitigation for NRHP Eligible Archaeological Sites and Associated Significance Criteria for Site Segments within the A.P.E. of the Recommended Alternative for the Saddle Road Improvement Project

By: Erigo Uyayashide Date: 4/30/97

SITE #	DESCRIPTION	CRITERIA	IMPACT	MITIGATION
20852	Burial <sup>1</sup>	D	no	Avoid
20854	Ranching - Habitation & Animal Enclosures	D	yes	Data Recovery Only
20855	Transportation- Old Waimea-Kona Rd.	D <sup>1</sup>	yes	Data Recovery, Interpretation
5002	Ranching-Ka'ohle Wall <sup>1</sup>	D	no	Avoid
5003	Temporary Habitation <sup>1</sup>	D	no	Avoid
14638	Temporary Habitation <sup>1</sup>	D	no	Avoid
20862	Ranching- Linear Wall	D	yes	None <sup>2</sup>
20865	Ranching- Linear Post Fence	D	yes	None <sup>2</sup>
20877	Ranching- Linear Wall	D	yes	None <sup>2</sup>
21150	Transportation- Ilimu'ula Wagon Trail	D <sup>1</sup>	yes	Data Recovery, Interpretation
7119	Ranching-Ilimu'ula Sheep Station Walls	D <sup>1</sup>	yes	Data Recovery, Interpretation
10309	Transportation- Pu'u 'O'o Volcano Trail	D <sup>1</sup>	yes	Data Recovery, Interpretation
20856	Paving	D	yes	None <sup>1</sup>
20878	Transportation- Iliho Pu'u 'O'o Trail	D <sup>1</sup>	yes	Data Recovery, Interpretation
20864	Transportation- Old Saddle Road	D <sup>1</sup>	yes	Interpretation <sup>2</sup>
20869	Survey Marker	D	no	None <sup>2</sup>
20870	Agriculture- 'Ola'a Flume	D <sup>1</sup>	yes	Interpretation <sup>1</sup>
20872	Recreation- Iliho Country Club	D	no	None <sup>2</sup>
20873	Habitation- Senator Kimi's House	D	no	None <sup>2</sup>
TCP	Mauna Kea <sup>1</sup>	TCP	indirect	Avoid; defer to Univ. of Hawai'i Management Plan study

1. Not within the Recommended Alternative APE but identified as eligible during alternate alignment investigations.
2. Data Recovery has been completed, either as part of this project or other independent surveys.
3. Additional Significance Criteria may apply outside of road corridor crossing.

## 1.5 Saddle Road Newsletters

# SADDLE ROAD NEWS

ISSUE 1

November 1994

## INTRODUCTION

Planning for long awaited improvements to Hawaii State Route (SR) 200, Saddle Road, is now under way. The Federal Highway Administration (FHWA), Central Federal Lands Highway Division, and the U.S. Department of the Army, in cooperation with the Hawaii Department of Transportation and the County of Hawaii, are proposing to improve Saddle Road. We would like to take this opportunity to inform the public about the status of current developments and future plans for the proposed improvements. We are always available to listen to comments, ideas, and concerns and to work with the Big Island community to make the Saddle Road a safe and enjoyable highway facility and to ensure its compatibility with the surrounding environment.

The proposed improvement will consist of a two-lane highway with enough capacity to safely handle both current and projected traffic volumes up to and beyond the year 2014. Prior to any construction, however, the project must be cleared environmentally. The first phase will include preparation of an environmental impact statement (EIS) covering the proposed action. Although the original project scope was to address the roadway improvements on the Pohakuloa Training Area (PTA), Federal requirements for logical termini as defining limits for an EIS dictated the expansion of the study to include virtually all of the Saddle Road. The portion of Saddle Road covered by the EIS begins at the west edge of Hilo at approximately milepost 5 (the

intersection with the proposed Puainako Street extension) and extends some 49 miles westward to a junction with Hawaii SR 190, the Mamalahoa Highway.

The Military Traffic Management Command (MTMC) has authorized Defense Access Road (DAR) funds to prepare an EIS for the entire Saddle Road. In addition, because of the impact of the military operations at PTA on Saddle Road, the MTMC has agreed to design and construct, through the FHWA, the portion of the Saddle Road improvements within the approximate limits of the PTA as its contribution to improving this State highway. The Hawaii Department of Transportation has agreed to improve the remaining portion of the road. Funding for the entire EIS and the final engineering design work for the section within the approximate limits of the PTA has been provided by the MTMC through its DAR program. The DAR program is jointly administered by the MTMC for the Department of Defense and the FHWA for the Department of Transportation.

## HISTORY

Saddle Road was initially constructed in 1942 by the U.S. Department of the Army to provide access to the Pohakuloa Army Base on the Island of Hawaii. In 1945 the road was released by the U.S. and turned over to the Territory of Hawaii. The Territory maintained the road until 1957 when the lack of Territorial funds necessitated transfer of road maintenance to the County of Hawaii. In 1965 the State of

9-258

Hawaii authorized the establishment of a State highway system. Saddle Road was included in the State highway system, and an exchange of road jurisdiction with the County of Hawaii was agreed upon in 1968. This agreement, however, was never implemented due to the lack of State funds; thus, the County has continued to maintain Saddle Road.

Saddle Road is the only paved arterial serving the U.S. Department of the Army's PTA and the astronomy complexes located atop Mauna Kea. Over the years, Saddle Road has also become an important cross-island link between Hilo (center of Island government) on the east side of the Island, Waimea to the north, and Kailua-Kona and developing resort areas on the west side of the Island. Until recent reconstruction efforts by the County, the route has received only minimal upgrading since it was first built. Between 1988 and 1992, the County widened and repaved 14 miles of the existing alignment from Hilo westerly. However, geometric deficiencies (i.e., substandard horizontal and vertical curvature) still exist. Today, it remains inadequate in terms of acceptable roadway design standards.

#### ***CURRENT DEVELOPMENTS***

Federal regulations require the involvement of appropriate Federal, State, and local agencies as well as the public in the environmental clearance process. The FHWA, as lead agency, has formed a SEE (Social, Economic and Environmental) Study Team to guide the project through the developmental process. Representatives from the FHWA, the U.S. Department of the Army, the Hawaii Department of Transportation, and the County of Hawaii serve on the SEE Team. The FHWA has primary responsibility for developing the Saddle Road project and will be performing the necessary engineering and environmental studies to accomplish this. To assist in this effort, the FHWA is utilizing

RUST Environment & Infrastructure (RUST), a consulting firm that it presently has under contract. The firm of Okahara & Associates (O&A) of Hilo and Kailua-Kona is a subconsultant to RUST and serves as the local representative for the project development team.

U.S. Senator Daniel K. Inouye of Hawaii has been a driving force behind the efforts to improve the entire Saddle Road for the benefit of Big Island residents. In May 1993 the Senator formed the Saddle Road Community Task Force (SRTF) to "assist and advise" those agencies responsible for the development of the improvement project. Mr. Melvin Hewett of Kamuela and Mr. Reggie Okamura of Hilo co-chair the SRTF. Other SRTF members include: Mr. Bob Bethea, Hilo; Ms. Shirley Freeman, Kailua-Kona; Ms. Marni Herkes, Kailua-Kona; Mr. Robert Kim, Kailua-Kona; Mr. Walter Kunitake, Holualoa; Mr. George Martin, Hilo; Mr. Dwayne Mukai, Hilo; Ms. Liliuokalani Ross, Kamuela; and Mr. Charles Young, Captain Cook.

The SRTF forms the nucleus for community input and consensus for the proposed improvements to Saddle Road. It acts in an advisory capacity to the project development team regarding such issues as alternate corridors and route alignment, environmental protection, Native Hawaiian concerns, and accommodations for the military.

In accordance with Federal regulations, on March 21, 1994, the FHWA issued a letter of intent advising that efforts would commence for the preparation of an EIS covering the proposed improvements to Saddle Road and solicited comments from interested agencies, organizations, and citizens.

On May 10, 1994, an interagency scoping meeting was held in Hilo to gather information from those agencies concerned with the

proposed improvement of Saddle Road and to help define issues, concerns, and opportunities that should be examined.

Also in May, three public scoping meetings were held to explain the proposed project to the public and to obtain public participation in identifying issues, concerns, and alternatives that need to be addressed in the EIS preparation process. These meetings were held in Hilo, Kailua-Kona, and Waimea on May 10, 11, and 12, 1994, respectively. A comment sheet inviting written responses to questions on key issues was distributed to the attendees. Responses were solicited regarding (1) frequency of use of Saddle Road; (2) destination; (3) alignment changes; (4) primary improvement needs; (5) major benefits/objections; and (6) potential environmental, social, or economic impacts. Substantial input from the public was generated. During the meetings, many spoke about issues and concerns and expressed their thoughts and ideas regarding the proposed improvements. Written responses were received as well. Public comments varied from spending the money on the coastal Hamakua route rather than improving Saddle Road, to abandoning the road in favor of constructing a monorail. Most of those speaking stressed safety and the need to upgrade the twisting, narrow road by straightening, widening, and repaving. Others expressed concern for potential impacts on endangered bird and plant habitats. Most were in favor of improving Saddle Road as soon as possible.

Two project information centers, one in Hilo and one in Kona, were opened to the public two days a week from June 28 to July 14, 1994. These centers provided further opportunities to exchange ideas and information with the public.

All comments received have been reviewed and taken into consideration as part of the scoping process.

The primary initiative prompting the preparation of an EIS for the entire Saddle Road was the military's proposed relocation of Saddle Road to the northern boundary of the PTA to avoid the ever increasing conflict and potential danger between the traveling public and military maneuvers. Previous studies had established five different alternative alignments to accomplish this. Upon broadening the study to encompass the entire Saddle Road, additional alignment variations on the east and west ends were introduced during the scoping process. (See the accompanying illustration.)

On the east end of the route, three alternatives were proposed in the vicinity of Kaumana City on the west edge of Hilo. One followed closely along the north edge of the present road. Two other alternatives, one on either side of the present road corridor, were proposed to circumvent housing developments and move the alignment of Saddle Road out of a congested area.

On the west end, a total of six alternatives were proposed. One generally followed the present road from the Kilohana Girl Scout Camp to its present junction with Hawaii SR 190 about 6 miles south of Waimea. Another extended northwesterly from a point on the present road approximately 2 miles southeast of the Kilohana Girl Scout Camp to a connection with Hawaii SR 190 at the Waikola Junction. Two other proposed alignments swung a little further south from the same point along the Ke'amuka lava flow, one on either side of the South Kohala-North Kona district boundary. A fifth alignment extended westerly from approximately the same point as noted on Saddle Road to a connection with Hawaii SR 190 near Puuanahulu. The sixth alternative swung south from the fifth alternative to intersect Hawaii SR 190 approximately 6 miles north of Palani Junction.

To perform detailed engineering and environmental studies on all the proposed alternatives would be very time consuming and costly. Thus, in the scoping process one of the primary goals is to narrow the possibilities to those reasonable alternatives that best meet the intended purpose and need. The selected alternatives are then evaluated in detail for engineering feasibility and for social, economic, and environmental effects.

After considering all issues, concerns, and alternatives, the SRTF recommended eliminating some of the proposed alignments. The northern alignment (E-1) on the Hilo end was eliminated because it extends through a potential wetlands area and impacts an ongoing flower/foilage farm and a proposed golf course. Proposed alignments PTA-2 and PTA-4 were eliminated. PTA-2 was eliminated because of its impact on the military maneuver area and Hawaiian Home Lands and its similarity to PTA-3. PTA-4 creates substantial impact on the military operations. On the western end, proposed alignments W-5 and W-6 were eliminated. Both alignments created major concerns with respect to potential impacts on hunting and archeological areas, open space, critical plant and animal habitats, and increased fire danger.

The SEE Team, after further deliberations, essentially agreed with the SRTF's recommendations, reinstating only one alternative (E-1) on the Hilo end. Although the proposed alignment has the potential for critical impacts, it is still a viable alternative and should be given further consideration.

The SEE Team thus concluded the alternatives to be evaluated would be E-1, E-2, and E-3 on the Hilo end; alternatives PTA-1, PTA-3 and PTA-5 through the PTA area, staying as far south of the mountain as possible behind the cantonment area and Bradshaw airfield; and alternatives W-1 through W-4 on the west end.

#### *FUTURE PLANS*

The next step is to map the alternatives to be studied. The proposed alignments will be engineered so that corridor width can be minimized and roadway grades, (i.e., steepness) can be realistically determined. After the proposed corridors have been mapped, the environmental studies can commence. Included will be such studies as archeological, historic, and cultural preservation; biological and botanical impacts; noise and air quality impacts; social and economic impacts; and such other studies necessary to cover all potential impacts of the proposed road improvement.

The aggregate mileage involved in the selected alternatives amounts to some 102 miles, all of which will require detailed study. Our current projections indicate the mapping and engineering studies will require approximately 8 months to complete. After the mapping is completed, much of the environmental evaluation work can be performed concurrently with the engineering studies. We estimate the environmental work will take approximately 14 months to complete. The numerous studies will then be evaluated and the draft EIS prepared. We anticipate the draft EIS will be ready for distribution approximately November or December 1996.

We hope that this information has been helpful. Additional newsletters will be issued from time to time to keep you abreast of further developments. If you have any questions, concerns, ideas, or comments, please write or contact the Federal Highway Administration, c/o Okahara & Associates, Attn: Mr. Bill Moore, 200 Kohola Street, Hilo, HI 96720, (808) 961-5527, or you may contact any of the SRTF members.

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# ANI KUA MAUNA SADDLE ROAD NEWSLETTER

NOVEMBER 1996

### History of the Cross-Island Link

What began in 1942 as an access road to the Pohakuloa Army Base on the Island of Hawaii has since become an important cross-island link between East and West Hawaii. Saddle Road, built by the Federal Government, was turned over to the Territory of Hawaii in 1945. When territorial funds ran low, road maintenance duties were transferred to the County of Hawaii in 1957.

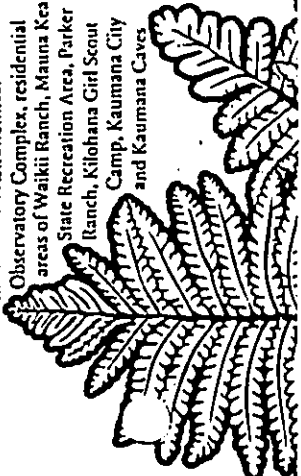
*Kani Kea Mauna, the head of the maintenance staff, a former member of the Task Force, is shown in the photo. The name of the firm was designed by Sig. Zane of Public Graphics.*

The State of Hawaii adopted a State highway system in 1965, and Saddle Road was included in this State highway system. An agreement was reached in 1968 between the County and State to exchange the road jurisdiction. But, the State lacked necessary funding so the County had to maintain the road.

Until recent reconstruction efforts by the County, Saddle Road received only minimal upgrading since it was first built. Fourteen miles have been widened and repaved just above Hilo, yet substandard conditions, steep grades, poor sight distances, and one-lane bridges still exist between Hilo and the Mamalaha Highway. Today, Saddle Road remains inadequate in terms of acceptable roadway design standards.

### Description

The Saddle Road, along with a portion of Kaumana Road, provides the only road access (some 53 miles) to Pohakuloa Training Area, Mauna Kea Science Reserve International Astronomical Observatory Complex, residential areas of Waikii Ranch, Mauna Kea State Recreation Area, Parker Ranch, Kilohana Girl Scout Camp, Kaumana City and Kaumana Caves



SADDLE ROAD TASK FORCE  
HAWAII ISLAND ECONOMIC DEVELOPMENT BOARD  
200 KANOLELEHUA AVENUE, #103  
HILO, HAWAII 96720

Only if one of the "build" options defined in the EIS is selected as the preferred alternative, and all remaining DAR funds are authorized and appropriated in fiscal year 1998 could reconstruction of this 13+ mile section (roughly from milepost 42 to the Mauna Kea Access Road) begin as early as mid-'98. Construction funds are being sought for the balance of the project.

### Upcoming Issues and Information

We hope this information has been informative. We plan to distribute three additional newsletters to keep you up to date on Saddle Road. Our December issue will focus on the alternative routes under consideration and will provide a detailed map. February's issue is planned around the environmental issues the project faces, and April will discuss environmental mitigation measures.

Should you wish to schedule an informational presentation to your group or organization, please contact Big Island Project Coordinator Bill Moore at (808) 961-5527. Associates, 200 Kihola St., Hilo, HI 96720, (808) 961-5527.

Mapping and engineering programs began in February 1995. These programs included the ground survey, mapping, drainage and geotech reports, alternative alignments and grade, cost estimates, agency review and a final report. Also in February 1995 a limited start was given to the required environmental studies; the full go-ahead was given eight months later. Between February 1995 and November of this year, public and agency project meetings continued, environmental inventories and studies have been ongoing and alternative routes will be combined in the EIS and released for public review.

### Tentative Schedule

Current plans call for the completion of the draft EIS in March of 1997 and final EIS next December. Defense funding is still pending for the final design and construction efforts for the PTA section, roughly one-third of the entire route. To date, \$5 million in Army DAR funds have been secured and authorized for the EIS and on-post design efforts. Another \$1.5 million should be available in the next few months.



County Park. Access to public lands and forest areas for hunting, gathering, ranching and recreation are also provided by Saddle Road.

This two-lane Saddle Road connects Hilo from about milepost 7.8 to the Mamalaha Highway approximately 6 miles south of Waimea. Saddle Road is the shortest route between the east and west side of the island, and as a result is widely used by island residents and a limited number of sight-seers, despite its poor condition. Saddle Road has become an important cross-island link between the county seat of Hilo, the northern town of Waimea, the district of Kona, and the resort areas of the Kohala Coast.

### Proposed Improvement

For more than two decades various government agencies have discussed the feasibility of upgrading the Saddle Road corridor as a vital link between East and West Hawaii. In 1992, Senator Daniel K. Inouye initiated formal discussions through the Department of the Army and the Federal Highway Administration (FHWA).

The Federal Highway Administration (FHWA) and the U.S. Department of the Army, in cooperation with the Hawaii Department of Transportation and the County of Hawaii, are now proposing to improve Saddle Road. FHWA is the lead federal agency.

Proposed improvements would upgrade Saddle Road to a two-lane highway with shoulders to provide adequate capacity to handle projected traffic volume for 20 years



# KANI KUA MAUNA SADDLE ROAD NEWSLETTER



into the future, and bring the roadway up to appropriate design standards. Even without proposed improvements, future traffic volumes are expected to increase to levels beyond the existing road's ability to handle.

As all present roadway users know, military training operations occur along Saddle Road in the Pohiakuola Training Area (PTA), creating potential conflicts and safety hazards for motorists on Saddle Road. To separate Saddle Road traffic from ongoing military operations to improve safety and reduce conflicts, the Military Traffic Management Command (MTMC) has approved the use of Defense Access Road funds (DAR) to design and construct Saddle Road improvements within the boundaries of PTA. This substantial contribution is the "Defense" fair share for State highway improvements. Funding for the rest of Saddle Road improvements will have to be provided by other sources.

An Environmental Impact Statement (EIS) for the entire Saddle Road (from milepost 6 on Kaumana Drive to the Mamalahoa Highway) is being prepared with DAR funds authorized by the MTMC. Also, MTMC is authorizing Army DAR funds for final design work within the PTA boundaries as those funds become available.

## Need For The Project

Although paved for its entire length, Saddle Road is a narrow, winding, barely two-lane road with steep grades, sharp curves, poor pavement and substandard drainage. Even with the limited County reconstruction efforts, geometric deficiencies still exist. Today, the alignment, grade, sight distances, drainage and other features remain substandard for arterial highways.

Of utmost concern are what is termed as horizontal and vertical alignment deficiencies, conflicts with military training exercises, poor pavement conditions, narrow road width, roadside hazards, inadequate signing and pavement markings, and the lack of shoulders.

Saddle Road is used as two-way access, yet traffic lanes with poor pavement, and inadequate shoulders encourage motorists to drive in the center of the road. This, of course, creates a very hazardous situation that increases the potential

PHOTO COURTESY - HERTZ RENTALS

for head-on collisions. In one stretch of Saddle Road alone, between PTA and Mamalahoa Highway, there are six one-lane bridges.

Not surprisingly, Saddle Road has a higher accident rate when compared with the overall average accident rate on other rural, two-lane highways on the Big Island. A recent seven-year traffic study put the accident rate for Saddle Road at 4.7 accidents per million vehicle miles versus the average of 3.0 traffic accidents. The types of traffic accidents reported included 4 fatal accidents, 258 injury accidents and 260 property-damage-only accidents.

The primary purpose for the proposed improvement is to reduce the conflicts between military operations and other Saddle Road traffic, and provide a safe highway through improved design for future traffic volumes.

## Safety First

Conflicts do arise between military vehicles traveling Saddle Road at 25 m.p.h., soldiers and tanks crossing this road at strategic locations, and civilian cars driving this very same roadway with driving speeds often exceeding safe limits. Military vehicles may encounter soldiers or military equipment crossing Saddle Road at any time, not to mention the frustration of driving behind a slow moving convoy which can cause motorists to attempt unsafe passing maneuvers. Even with strict military regulations for vehicular traffic and ordnance movement, authorities have continuing concerns for the potentially dangerous combinations of civilian and military traffic.

The civilian purpose of the EIS in preparation is to identify and evaluate alternatives for improvements to Saddle Road to provide a safe and efficient link between East and West Hawaii. Alternatives were developed by a professional interagency team and through numerous public meetings, and are being evaluated according to:

- 1 environmental impacts
- 2 minimize conflicts between motorists and military training operations
- 3 eliminate substandard roadway design elements and geometric deficiencies
- 4 improve operation function and travel time
- 5 improve traffic capacity
- 6 accommodate present and future traffic levels
- 7 cost of construction

## Project Update

In May 1993, U.S. Senator Daniel K. Inouye formed the Saddle Road Community Task Force with secretariat support from the Hawaii Island Economic Development Board as a channel for community input and consensus-building. Alternative corridors and route alignment, environmental protection, Native Hawaiian concerns, and accommodations for the military were some of the issues discussed at various task force meetings.

Members of the Saddle Road Community Task Force include co-chairs Mel Hewett and Reggie Okamura, Bob Bellera, Shirley Freeman, Marni Herkes, Robert Kim, Walter Kumuake, George Martin, Dwayne Mukai, Liliuokalani Ross and Charles Young, Secretariat:

Hawaii Island Economic Development Board  
Paula Helfrich, Executive Director  
200 Kanolehua Av. Box 103-281  
Hilo, HI 96720  
(808) 966-5416 • Fax (808) 966-6792

FHWA organized a Social, Economic and Environmental Study Team (SEETeam) to guide the Saddle Road project through the development process. Members of the SEETeam include representatives from FHWA, U.S. Department of the Army, Hawaii Department of Transportation, County of Hawaii and U.S. Army Corps of Engineers. It is this professional team's job to guide the project development through the EIS process.



Palila

This rare native bird is found among the remaining forests on the higher slopes of Mauna Kea. The palila feeds on the seeds of the mamane.

Both of the above mentioned "teams" were instrumental in developing the alternatives.

Project scoping, surveying, mapping, engineering studies and environmental work have been undertaken. In October 1994, possible route improvements evolved into those alternatives selected for study under the forthcoming EIS.

WM Bnd  
FHWA  
555 Zang St  
DENVER, CO 80225



# ANI KUA MAUNA SADDLE ROAD NEWSLETTER

JANUARY 1997

## Alternatives

For the past two years, alternatives for the improvement of Saddle Road have been developed and refined with the input and involvement of the SEE Team (organized by Federal Highway Administration), Saddle Road Task Force, key governmental agencies, local residents, neighboring landowners, and citizens at large. This input and evaluation process allowed for early consideration of public needs, engineering criteria, and environmental issues of concern, and resulted in numerous changes to and refinements of the original alternatives.

As a result of this process, 12 possible alternative routes remain under study, 10 alternative segments were ferred and eliminated, and a "no action" alternative another possible outcome of this process.

This issue briefly describes these alternatives for the proposed project designed to improve Saddle Road to a two-lane highway with enough capacity to safely handle projected traffic volumes up to the year 2014. Uphill passing lanes, truck escape ramps, scenic pullouts, and military crossings are being examined as part of preliminary roadway design to enhance safety along Saddle Road.

All proposed improvements to Saddle Road fall between Mamalahoa Highway on the west side and mile post 6 near Hilo on the eastern end. These were logical termination points as Saddle Road connects to another established transportation route at Mamalahoa Highway, and mile post 6 near Hilo is the future point of connection of the existing road to the proposed Puainako Street Extension.



## No Action Alternative

The No Action Alternative is also under consideration. This alternative would maintain Saddle Road as it is today and would include the completion of short-term or minor, maintenance and restoration. It would not upgrade Saddle Road to minimum design standards nor would it enhance safety, improve level of service or operational function, accommodate future traffic levels, or reduce or eliminate conflicts between the traveling public and PTA military training maneuvers. Traffic volumes would continue to grow with this No Action Alternative, but at a slower rate than with the action alternatives.

## Upcoming Issues and Information

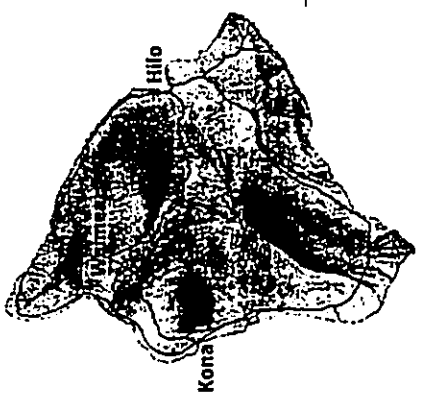
We hope this information has been informative. Current plans call for the completion of the draft EIS in April of 1997 and final EIS next December. Our next



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200 KANOLEHUHA AVENUE, # 103  
HILO, HAWAII 96720

newsletter issue will also be sent to you in March and will keep you informed of the environmental issues the project faces.

Should you wish to schedule an informational presentation to your group or organization, please contact Big Island Project Coordinator Bill Moore c/o Okahara & Associates, 200 Kohola St., Hilo, HI 96720, (808) 961-5527.



## Typical Roadway Designs

Three typical roadway design cross-sections were developed for the proposed Saddle Road. The roadway will be designed throughout the entire project length with two 12-foot travel lanes, and includes 8-foot paved shoulders. For added fire safety, project segments under consideration through Pohakuloa Training Area (PTA-1) and PTA-3) feature additional 8-foot paved shoulders that may be used as a bikeway.

The additional 8-foot paved shoulder is located predominately on the mauka side of the highway, and includes a four-strand smooth wire fence with metal post between the shoulder and the bikeway along with an extruded asphalt curb on the bikeway's outside edge.

In the vicinity of Mauna Kea State Park, additional 8-foot paved shoulders on both the north and south sides of the highway are envisioned to provide fire protection for the Mamane forest and to serve as bikeways. These will also be set apart with wire fencing and edged with asphalt curbing.

## Under Consideration

For ease of discussion in the Environmental Impact Statement the Saddle Road project area has been divided into four sections:  
Section 1—Begins at the junction of Mamalahoa Highway (HI190) and extends east to Saddle Road mile post 42.

*Kani Kua Mauna... sound of the mountain ridge firing cascades for our Saddle Road Task Force members. The name comes from the chant of the Pele and Hilo legends. The name is from legend as depicted by Sig Zane of Public Graph.*

# KANI KUA MAUNA SADDLE ROAD NEWSLETTER

Section II—Mile post 42 to 28.  
Section III—Mile post 28 to 10.  
Section IV—Mile post 10 to the eastern project terminus, mile post 6.

The formulation of alternatives for Saddle Road in Sections I, II and IV considered use of the existing road alignment as well as potential new alignments. Within Section III, improvement along the existing alignment was considered the only practicable alternative after much discussion and investigation of other potential routes.

Within each of these four sections are alternative road alignments called *segments*. This project initially considered 20 segments. Of these, 10 were feasible, warranting more detailed analysis; the other 10 were eliminated from further consideration.

Subsequently, the 10 feasible segments were evaluated in full detail by the project team of specialists, including biologists, botanists, archeologists, sociologists, economists, land use specialists, water quality specialists, visual resource specialists, and engineers. Technical reports were prepared by each specialist, and based upon analysis of these reports the SEE Team eliminated another two segments from consideration (EX-1 and EX-4).

As you refer to the enclosed map of segments under consideration, the "EX" represents the existing Saddle Road alignment, "W" refers to the west end of the project, "PTA" refers to Pohakuloa Training Area, and "E" refers to the east end.

Segments within the PTA section (Section II) would be the first projects to be constructed beginning in 1998 through the year 2000 because the project is authorized under Defense Access Road Program funding for design within

these limits now. Projects outside of the PTA would be phased over a number of years as funding becomes available. Implementing the proposed project within any one section or any combination of sections of Saddle Road will improve overall travel conditions. Since the segments identified within each section begin and end at a common point on Saddle Road,

selection of a particular segment within any one section will not influence the selection within any of the other sections.

As you noted in our issue, the MTMC (Military Management Traffic Command) has agreed to fund the design and construction of that portion of Saddle Road improvements within the approximate limits of PTA. State of Hawaii Department of Transportation will improve the remaining portion of the road over time, as funds become available.

## Section I

Two segments are under consideration within this section—

**Segment W-2**  
New construction will be required for most of this segment, except for the east end where W-2 follows the existing Saddle Road for about 1,000 meters requiring the existing road to be reconstructed with major grade and alignment improvements. W-2 extends from Mamalahoa Highway at the Waikoloa junction to mile post 42. W-2 connects Saddle Road directly to Waikoloa Road and will reduce the travel distance between Hilo and Kona. Total estimated construction cost for W-2 is just over \$37.2 million.

## Segment W-3

Segment W-3 offers another new construction alternate through Section I, intersecting the Mamalahoa Highway about two miles south of Waikoloa junction. W-3 offers a shorter travel distance between Hilo and Kona than either the existing road or Segment W-2. Estimated construction cost is \$39.1 million.

## Section II

In Section II, three segments are under consideration—

**Segment EX-2**  
This segment follows the existing Saddle Road alignment through Section II and includes the rebuild of Saddle Road with major grade and alignment improvements to bring it up to standards. Estimated construction cost is \$38 million.

## Segment PTA-1

Nearly the entire length of PTA-1 that runs from mile post 42 to mile post 28 will constitute new construction at an estimated cost of \$42.7 million. This Segment PTA-1 will relocate this section of Saddle Road to the northern boundary of the Pohakuloa Training Area thus completely avoiding conflicts between the traveling public and military maneuvers.

## Segment PTA-3

PTA-3 is an alternate alignment modification to PTA-1 that was formulated to avoid placing new roadway on Hawaiian Homelands. As with PTA-1, PTA-3 will constitute new construction for nearly its entire length at an estimated cost of \$45.7 million.

## Section III

Just one segment is under consideration through this section—

## Segment EX-3

No feasible or practicable alternatives to the existing road corridor were identified within Section III. So from mile post 29 to mile post 10, this segment runs along the existing alignment. Previous lava flows are located on both sides of the Saddle Road through this section. EX-3 requires the rebuild of Saddle Road with major grade and alignment improvements to bring it up to standards. Estimated construction cost is \$60.3 million.

## Section IV

Two segments remain under consideration here—

## Segment EX-4A

EX-4A, an alternate alignment to the eliminated EX-4, follows the existing road on the west and east ends of Section IV. In the middle, it splits from the existing road and follows an existing transmission line corridor. This alignment was identified in an effort to relocate a portion of Section IV away from existing development. Construction estimates are \$9.9 million.

## Segment E-3

This segment, from mile post 10 to mile post 6, was included in an attempt to bypass existing development, prevent congestion and avoid residential locations. Estimated construction cost is \$17 million.

## Possible Routes

These eight segments identified above have been combined into 12 possible routes, or alternatives. Implementation of any of the 12 action alternatives would result in a wider, less undulating roadway designed for 50 mph with shoulders for increased safety for stopped vehicles, truck escape ramps, scenic pullouts, uphill passing lanes and proper signage. The new roadway would provide for greatly improved response times for emergency vehicles, reduced accident rates, increased traffic capacity, and reduced travel time and fuel consumption for cross-island travel.



# SADDLE ROAD PROJECT BULLETIN

## Introduction

Hawaii Island has a land mass of 4,030 square miles and a population of over 130,000 generally located in communities along coastal roads. Historically, there has been some level of cross-island access by walking trails and rough cinder wagon-roads. The first cross-island Saddle Road was constructed by the Army in 1942. Over the years, there have been modifications and improvements to this road in attempts to address modern transportation requirements.

In 1987, the U.S. Army Western Command completed a Defense Access Road Program (DAR Program) military roadway needs study and identified Saddle Road within the Pohakuloa Training Area (PTA) on the Island of Hawaii as needing improvement. The Military Traffic Management Command (MTMC), responsible for the DAR Program for the Department of Defense (DOD), then requested the Federal Highway Administration (FHWA) to prepare an engineering evaluation, including a cost estimate for improving the roadway. In 1989, the MTMC determined that the section of Saddle Road within the PTA was eligible for DAR funding; the Hawaii Department of Transportation (HDOT) agreed to improve the remaining sections of the road. Until 1990, planning efforts focused on improving only that section of Saddle Road passing through the PTA. During this early interagency planning process, it became apparent that military training and public safety could be significantly improved by moving the section of Saddle Road passing through the PTA north of the military installation, thereby reducing conflicts between military operations on the base and public users of the road. This planning change was eventually agreed upon by all participating agencies.

Agencies then determined that it would be necessary to prepare an Environmental Impact Statement (EIS) considering social, economic, and environmental issues and concerns for a full range of alternative improvement options between the Mamalahoa Highway and Hilo. This was required in order to consider all possible alternative routes between two logical termini, as required by the National Environmental Policy Act (NEPA). The DOD is funding the EIS preparation for the entire route and has indicated that the section of Saddle Road within PTA will remain eligible for construction as funds become available.

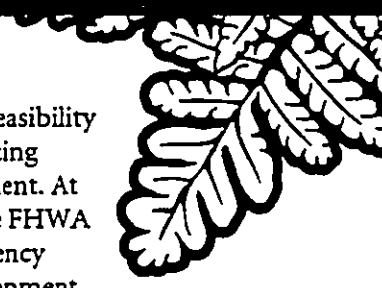
Following these decisions, planning proceeded in defining the expanded project's purpose and need, defining alternative routes, examining project issues and concerns, and developing

measures for evaluating the feasibility of the alternative routes utilizing considerable public involvement. At the request of the HDOT, the FHWA agreed to serve as the lead agency responsible for project development, with the assistance and cooperation of many participating agencies, the Social Economic, and Environmental interagency team (SEE Team), and a citizens group called the Saddle Road Task Force (SRTF). In 1995, a team of scientists and engineers began to collect and evaluate biological, botanical, archaeological, historical, social, economic, and engineering information associated with the alternative routes under consideration. Their studies and resulting reports culminated in the preparation of the Draft EIS (DEIS) which is available for public review at this time.

The DEIS provides information necessary to make informed decisions. The DEIS is intended to generate discussion among citizens, agencies, and organizations involved or interested in the project so that every viewpoint and concern can be taken into account in the final route selection and in determining the measures to be taken to offset any impacts caused by selecting that route. The FHWA will consider any further concerns and issues arising from these discussions, perform additional evaluations if necessary, and select and present a preferred alternative route with mitigation measures in a Final EIS. Agencies participating with the FHWA in selecting the preferred alternative include the Hawaii Department of Transportation, the Department of the Army, and Hawaii County. There are also numerous other regulatory and resource agencies that will be involved in the process of developing interagency agreements to ensure that mitigation measures required for the selected route can be implemented.

It is expected that the Final EIS (FEIS) with required interagency agreements can be completed by early spring of 1998. If agreement on the preferred route and mitigation measures can be achieved by this date, the FHWA could issue a Record of Decision (ROD) confirming the selected route in the spring or early summer of 1998. The ROD is a legal document which is binding on participating agencies for completion of all requirements itemized in it.

If this planning schedule is met and an alternative other than the "No-Action" alternative is selected, construction of an "Action" alternative within the PTA (Section II, see enclosed



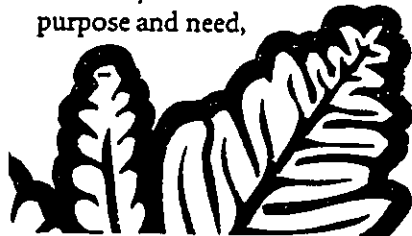
map) could begin as early as late fall, 1998. Construction of the selected route in Section II, which is estimated to cost approximately \$40 million, would take place over the course of several years as DOD funds became available. The remaining sections would be constructed by the HDOT and could be completed as early as the year 2006, if funding is available. Additional Federal funding could come from either the DAR Program (100% Federal funding) or the Federal Aid Highway Program (80% Federal funding, 20% State funding). It is proposed that the remaining sections be constructed in the following order: 1) Section I (Mamalahoa Highway to PTA); 2) Section IV (Milepost [MP]9 to MP6); and 3) Section III (MP28 to MP9). Depending on the alternatives selected for each section, the total construction cost of the preferred route could be in the range of \$150 million.

More detailed information on the proposed project can be found in the Saddle Road Executive Summary available by calling Okahara & Associates, at (808)329-1221. For further detailed information, the Draft EIS is available for review [on site] at the following locations: Hawaii Dept. of Transportation, 600 Kapiolani Blvd., Honolulu, HI; Hawaii Dept. of Transportation, 50 Makaala St., Hilo, HI; County of Hawaii, 25 Aupuni St., Hilo, HI; U.S. Army Garrison-Pohakuloa Training Area, Milepost 36, State Route 200, Hilo, HI; Wheeler Army Airfield, U.S. Army Garrison, Building 300, Schofield Barracks, HI; Federal Highway Administration, Hawaii Division, Federal Bldg., Punchbowl St., Honolulu, HI; Federal Highway Administration, 555 Zang St., Lakewood, CO; and the following libraries: Kaimuki Regional Library, Pearl City Regional Library, Hamilton Library at UH at Manoa, Kailua-Kona Public Library, Kaneohe Regional Library, UH Hilo Campus Library, Sinclair Library at UH at Manoa, Hilo Public Library, Hawaii State Library, Kahului Regional Library, and the Thelma Parker Memorial Library.

### The Draft EIS

The DEIS contains a detailed discussion of the reasons why the project is needed which define the proposed project's purpose. The development of the Action Alternatives is then guided by the project purpose. The DEIS also contains detailed discussions of all social, economic, and environmental information collected and analysed on each of the Action Alternatives. This information is presented in separate Chapters on the Affected Environment, Environmental Consequences, and Mitigation Measures specific to each Action Alternative.

The information contained in this project bulletin is an extremely brief overview of the detailed discussions on project purpose and need,



[www.saddleroad.com](http://www.saddleroad.com)

alternatives selection, and social, economic, and environmental issues, concerns, and proposed mitigation as presented in the DEIS. This bulletin is intended to encourage the reader to seek more detailed information in the DEIS, the Executive Summary, and the Technical Appendices available for review at the locations listed previously in this bulletin.

## Identified Issues

### Biological Concerns

- Construction of PTA-1 or PTA-3 would modify approximately 100 and 114 acres respectively of the Federally designated Palila Critical Habitat.
- Construction of either PTA-1 or PTA-3 would increase the threat of the ignition of unplanned wildfires.
- Construction activity along Sections II and III could temporarily displace native bird species and has the potential to disturb several endangered endemic bird species.
- Construction activity could modify the habitat of several native land snails, arthropods, and other insect species.
- All Action Alternatives would increase human access to the saddle area, which in turn will elevate the risk of disturbance to native habitats and species.
- All Action Alternatives would increase the potential for the further dispersal of alien insects and other alien species.
- Construction of Section III and IV has the potential to damage several kipuka found along the existing roadway.
- Indiscriminate parking of heavy equipment could destroy biologically sensitive areas, as could the storing of construction material; especially fill, petroleum, oil and other lubricants.

### Biological Mitigation/Benefits

- A total of 9,345 acres will be set aside for Palila Critical Habitat replacement lands in the Puu Mali, Kipuka Alala, and Kaohe lease areas.
- All Critical Habitat replacement lands will be fenced to exclude feral ungulates with some provisions for hunter access.
- Intensive studies and management of the Critical Habitat replacement lands will assist in formulating management plans to be implemented over a ten year period.
- Predator control and monitoring actions will be undertaken on all of the Critical Habitat Replacement Lands.
- Modifications will be made to the typical section of the proposed roadway through Section II including an additional 8-foot paved fire break separated from the 8-foot shoulder by a wire fence and curb to discourage vehicle and pedestrian access.
- A comprehensive fire management plan complete with risk assessment protocols and guidelines will be drafted to be consistent with Palila habitat recovery goals.
- No construction or unshielded equipment maintenance lighting

will be permitted after dark between the months of April and October to avoid impacting nesting shorebirds.

- A nest search of the right-of-way will be conducted by a qualified ornithologist prior to the onset of construction to avoid impacting endangered birds.
- Environmental studies for the EIS included a baseline invertebrate survey which gathered information on land snails, insects and other arthropod species distribution along the entire survey corridor.
- A study will be implemented to identify what impacts alien insects and other arthropods have on the insect foods necessary for Palila survival.
- All listed plant species detected during the technical studies will be fenced off from construction related activities at the right-of-way line.
- All construction activity will be restricted to within the clearly delineated construction corridor with biologically approved entrance points to the corridor.
- All construction equipment shall be thoroughly steam cleaned and fumigated before being transported to the construction site to ensure that no weeds, alien insects or other arthropods are transported to the construction site.
- During the final design phase a concerted effort will be made to design the segments to balance earthwork quantities so that no outside fill sources will be needed.
- During the final design phase an effort will be made to design the segments to avoid incursion into any of the kipuka located along with eastern routes.
- The right-of-way of PTA-1 or PTA-3 will be inspected every four months during the course of construction and manual spraying of emerging fountain grass with a suitable herbicide implemented.
- All equipment, material and support structures shall be stored and maintained either within the right-of-way or in designated staging areas that have been approved by a biologist.
- All construction personnel will be required to attend a project orientation meeting where specific environmental considerations and prohibitions will be explained.
- A project engineer and staff will be on site at all times during the construction to ensure implementation and compliance with the environmental mitigation requirements.

### **Socio-Economic Issues**

- Population on the Big Island increased from about 92,000 in 1980 to over 130,000 in 1996, largely as a result of the burgeoning visitor industry, placing increased pressure on the existing road system to provide mobility between the Island's population centers.
- Roughly 1.1 million tourists visited the Island of Hawaii in

1995, with approximately 33 percent visiting the east side of the island and 67 percent visiting the west. Because of the condition of Saddle Road, automobile rental agencies restrict or prohibit use of their vehicles on the road, discouraging some tourists from including cross-island trips in their itineraries.

- A declining economy in East Hawaii has resulted in an increasing number of individuals seeking employment or business opportunities in the more vigorous economy of West Hawaii.
- Saddle Road has become an important cross-island link for business travel, the transport of goods and services, tourism, recreation, shopping, and commuting.
- Saddle Road is not used regularly by bicyclists or pedestrians because of the substantial change in elevation along its length, foggy and rainy weather, steep grades, poor pavement condition, and the lack of adequate shoulders.
- Saddle Road bisects and provides the only access to the Pohakuloa Training Area for transportation of personnel and material, frequently leading to long military convoys interspersed with public road users who have cross-island destinations. Saddle Road provides the only access to a number of points along its corridor, including the astronomical observatory complex on Mauna Kea, Waikii Ranch, Upper Kaumana, The Mauna Kea State Recreation Area, and major hunting areas.
- Hunting is a long-standing tradition in Hawaii; introduced pigs, sheep, goats and a variety of gamebirds are hunted in public hunting units accessed by Saddle Road on the PTA and in nearby state lands.
- Mamane forest and kipuka are regarded as having special or sacred value to native Hawaiians.

### **Socio-Economic Concerns**

- Construction of any Saddle Road improvements may cause temporary delays and inconvenience to residents of Upper Kaumana, motorists on Saddle Road, and participants in activities located along the Saddle Road or accessed by it.
- All Action Alternatives may have impacts in the form of increasing access to hunting areas and Mauna Kea State Park, promoting off-road vehicle damage and impacting the Saddle's aesthetic values.
- There are potential impacts to hunting resulting from the selection of any of the Action Alternatives within Section II.
- Without mitigation, the removal of up to 114 acres of mamane forest that will occur with several Action Alternatives would be an impact.

### **Socio-Economic Mitigation/Benefits**

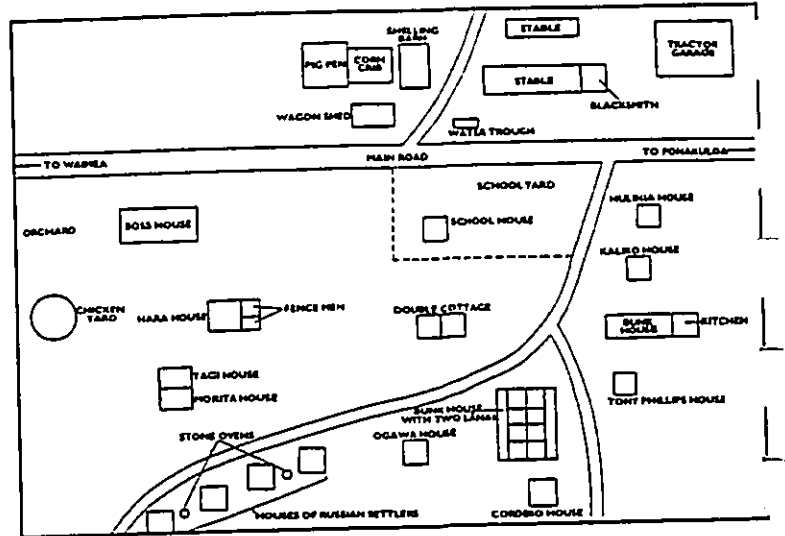
- Construction will be scheduled to avoid impacting activities known to generate significant cross-island traffic volumes,

such as the Merrie Monarch Festival, the Ironman Triathlon, the Mauna Kea Relay road race, and the Waikii Ranch Music Festival, and will maintain access to existing driveways and roads.

- The primary socio-economic impact of all Action Alternatives would be a beneficial impact related to direct and indirect employment from construction activities, improved business opportunities, and reduced business/commuting time between Hilo and Kona/South Kohala.
- The Action Alternatives could provide another beneficial impact of increased community cohesion on the Big Island by improving travel safety and time for participants in social and family events who are now separated by the travel distance.
- All Action Alternatives could have the following beneficial impacts: greater use of roadside areas for education, recreation and gathering; easier and safer access to Mauna Kea State Park; and the facilitation of sound ecotourism.
- All Action Alternatives would provide visually pleasing roadside facilities including turnouts and parking areas with interpretive signage at areas of scenic or historic interest.
- Hunters will be actively consulted in management of Critical Habitat replacement lands, particularly for activities related to feral mammals. Special mowing at the Kaohe Lease Lands will promote gamebird habitat.
- All Action Alternatives will have the beneficial impact of improved safety for bicyclists and pedestrians through construction of adequate shoulders, and in some areas an adjacent, paved fire break that would function for bike use.
- Hunters will benefit because of additional hunting lands and better access to existing areas.
- Improving Saddle Road provides a beneficial impact by encouraging visitor use of the corridor.
- The protection and restoration of 9,345 acres of mamane forest associated with Palila mitigation will help compensate for the loss of sacred mamane forest along Saddle Road.

#### Other Environmental Issues

- The interior of the Big Island was accessed in prehistoric and historic times for bird catching and adze making, ranching, and cross-island travel on numerous trails.
- The Saddle area of the Island of Hawaii provides many outstanding vistas of the landscape and natural terrain features.
- Traffic related environmental impacts along the existing road are very minimal at present because of the low road usage.



History of the Saddle — Waikii Village c.1920 supported Parker Ranch agricultural activities.

#### Other Environmental Concerns

- Historic archaeological sites such as temporary cave shelters, lava walls for livestock containment, wagon roads, and built-up livestock trails, resulting from the use of the Saddle area in prehistoric and historic times may be impacted to some extent by each of the Action Alternatives.
- Any of the Action Alternatives would alter the terrain such that a viewer of landscape features from the roadway or towards the roadway may consider the visual quality and/or character impacted.
- Temporary impacts to the environment can be expected to occur during any construction project.

#### Other Environmental Mitigation/Benefits

- All Action Alternatives can be modified in the area of linear historic archaeological sites to either avoid or minimize substantial impact to the features. Some small segments that are impacted will receive archaeological monitoring during construction with a data collection plan and traffic pullouts with interpretive signing.
- Roadside treatments along any of the Action Alternatives would include minimal clearing of trees and shrubbery, using erosion control measures and excavation techniques to impart a natural appearance. Vehicle pullouts would be provided for distant vista opportunities in several locations.
- Proposed measures to control environmental impacts during construction include minimizing erosion and revegetation of slopes where needed, watering for dust control, environmental awareness training of construction workers, and containing construction materials, fuels, and lubricants.

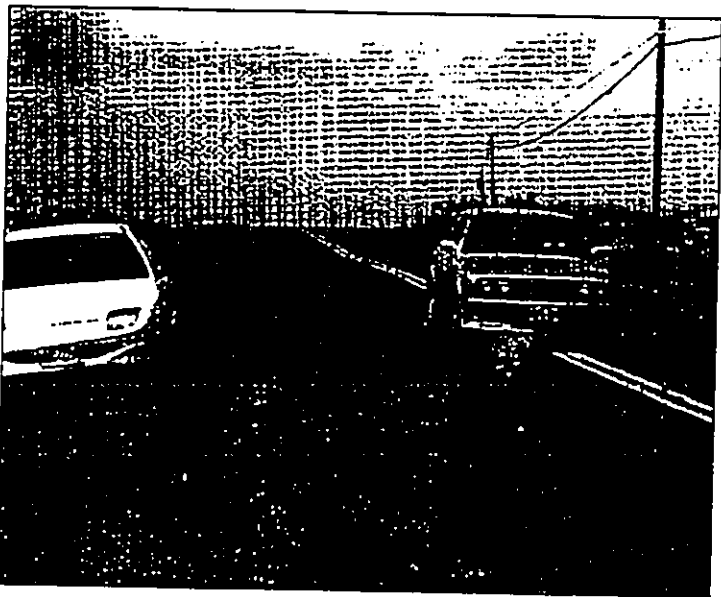


## Project Development

### Purpose and Need

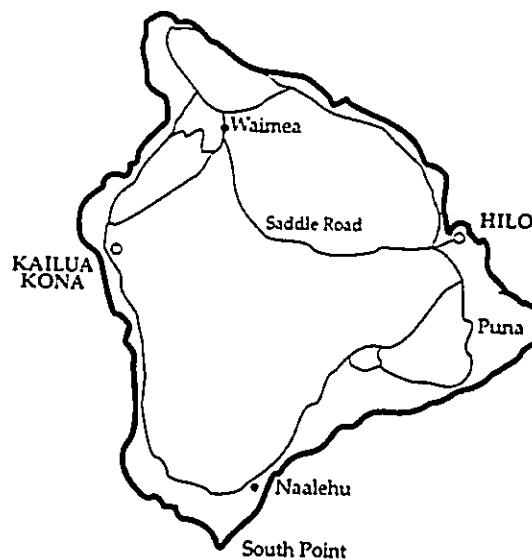
The proposed improvements would address five general types of needs or existing roadway deficiencies: roadway geometric and pavement deficiencies, conflicts and hazards associated with combined public and military use of Saddle Road, traffic carrying capacity deficiencies, motorist safety problems, and social demand and economic development.

- **Roadway deficiencies:** Existing Saddle Road is presently two-directional but, in practicality, operates as a one lane roadway because of extremely poor pavement condition. The narrow travel lanes combined with inadequate and rough shoulders, steep grades, sharp curves, substandard sight distances, and no roadside recovery area make vehicle operation and the passing of slow moving vehicles very hazardous.



- **Traffic Capacity:** Future traffic volumes projected for Saddle Road, without the proposed improvements, would equal or exceed the existing road's capacity, rendering traffic operations on the road extremely hazardous as well as inefficient with respect to fuel and time costs.
- **Motorist Safety:** Existing accident rates on Saddle Road are over 80% higher than other rural two-lane highways in the State of Hawaii. Poor roadway geometry and pavement condition presently hinder response time for emergency vehicles. Military training exercises between areas across the existing road and the use of Saddle Road for transport of troops and materiel sometimes creates hazardous traffic conflicts.

These existing problems and the improvement needs they identify define the primary purpose of the proposed project: To provide a safe and efficient route for access to and between land uses along Saddle Road and for cross-island traffic between East and West Hawaii.

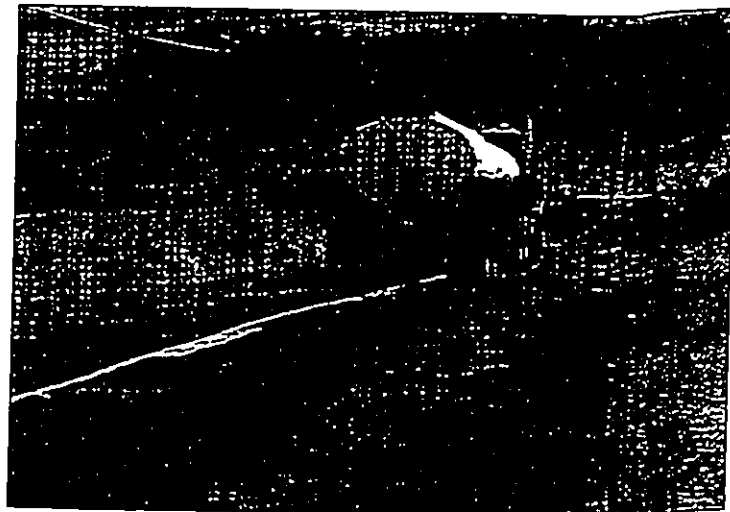


### Alternatives

Between 1994 to 1996, several alternatives for improvement of Saddle Road were developed and refined with input and involvement of a Social, Economic, and Environmental Study Team (SEE Team), the Saddle Road Community Task Force (SRTF), government agencies, local residents, and landowners. This process allowed for early consideration of engineering and environmental issues and numerous refinements of the alternatives under consideration. A preferred alternative has not currently been identified for the project.

The proposed improvements to Saddle Road will be designed for 50 to 60 mile per hour operation and would incorporate two 12-foot travel lanes with two 8-foot paved shoulders. Passing lanes may be added in select locations. In environmentally vulnerable portions of the study corridor within the PTA, additional features will be constructed to minimize fire hazards, including paved fire breaks, fencing, and asphalt curbs.

Uphill passing lanes, truck escape ramps, scenic pullouts, and military vehicle crossings will be incorporated into project





## RECEIVED AS FOLLOWS

designs as needed to enhance safety and improve the projected level of service.

### Action Alternatives under Consideration

The project area has been divided into four sections. Section I begins at the junction with SR 190 and extends east to Saddle Road MP 42. Section II extends from MP 42 to MP 28. Section III extends from MP 28 to MP 9, and Section IV extends from MP 9 to the eastern project terminus, MP 6. The eight segments under consideration are W-2 and W-3 in Section I; PTA-1, PTA-3, and EX-2 in Section II; EX-3 in Section III; EX-4A and E-3 in Section IV. In addition, the No Action Alternative is also considered.

**Section I.** Located south of the existing alignment, W-2 would connect Saddle Road to SR 190 at Waikoloa Road, Segment W-3 would connect with SR 190, 3 miles south of Waikoloa Road.



Palila by Frohawk

**Section II.** Segment EX-2 would rebuild Saddle Road with major grade and alignment improvements along the existing Saddle Road. It would not accomplish the desired separation of motorists from military maneuvers. Segments PTA-1 and PTA-3 represent alternative routes to the existing Saddle Road alignment within Section II. Located north of the existing roadway, PTA-1 and PTA-3 would succeed in separating Saddle Road motorists from military maneuvers.

**Section III.** Segment EX-3 would rebuild Saddle Road with major grade and alignment improvements along the existing Saddle Road. No feasible or practicable alternatives to the existing corridor were identified within Section III.

**Section IV.** Segment EX-4A would rebuild Saddle Road with major grade and alignment improvements along the existing Saddle Road on the west and east ends of Section IV, but would split from the existing roadway for a 1.2-mile portion

in the middle to follow an existing transmission line corridor. EX-4A was identified in an effort to relocate a portion of Section IV away from existing residential development in Kaumana. Segment E-3 represents an alternate alignment to EX-4A through Section IV and relocates the road farther away from Kaumana.

### No Action Alternative

The No Action Alternative would maintain Saddle Road as it is today. It would not enhance safety, eliminate roadway deficiencies, improve level of service, improve operational function, accommodate future traffic levels, nor reduce or eliminate conflicts between motorists and PTA military operations.

Persons wishing to provide comments for consideration during this DEIS review period are encouraged to attend either of the public hearings at the following locations:

Thursday, 12/11/97

7:00 P.M. - 10:00 P.M.

Royal Waikoloa

King's Ballroom

69-275 Waikoloa Beach Drive

Waikoloa, Hawaii

Saturday, 12/13/97

9:00 A.M. - Noon

University of Hawaii - Hilo

Wentworth Hall Room I

200 West Kawili Street

Hilo, Hawaii

Additionally, persons wishing to comment in writing on the proposed project may do so at the public hearing or mail comments to the FHWA, Box 50206, 300 Ala Moana Blvd., Honolulu, HI 96850; Attention: Mr. Abraham Y. Wong, Division Administrator, FHWA (HPD-16), 555 Zang Street, Room 259, Lakewood, CO 80228; Attention: Mr. Larry C. Smith, Division Engineer, or HDOT, 869 Punchbowl Street, Honolulu, HI 96813; Attention: Mr. Kazu Hayashida, Director. All written comments should be legible, include your name (individual and/or organization) and return address, and must be submitted by December 22, 1997 to be considered. Citizens having questions about the proposed project can call either Mr. Bert McCauley, FHWA Environmental Project Manager at (303) 969-5924, Ms. Nancy Burns, Okahara & Associates, Senior Project Engineer at (808) 329-1221, or Mr. Kenneth Au, HDOT (808) 587-1843.





# SADDLE ROAD PROJECT BULLETIN

## Project Update

Following the release of the Saddle Road Draft Environmental Impact Statement (EIS) in November of 1997 and associated public hearings in December 1997, discussions have been ongoing among citizens, agencies, and organizations involved or interested in the project. The intent of the Draft EIS was to generate these project discussions so that every viewpoint and concern could be taken into account in the final route selection, and in determining the measures to be taken to offset any impacts caused by the selected route. The Federal Highway Administration (FHWA) considered these concerns and issues in selection of the Recommended Alternative to be presented in the Final EIS due to be released in early spring of 1999.

Agencies providing input to the FHWA on selection of the Recommended Alternative included the State of Hawai'i Department of Transportation (HDOT), the Department of the Army, the U.S. Fish and Wildlife Service (USFWS), the U.S. Army Corps of Engineers (USACE), the Environmental Protection Agency (EPA), and Hawai'i County, collectively known as the Social, Economic and Environmental interagency team (SEE Team). Additionally, the FHWA is working with regulatory and resource agencies to develop interagency agreements to ensure that mitigation measures for the Recommended Alternative can be implemented. These agencies include the State of Hawai'i Department of Land and Natural Resources (DLNR), the USFWS, the Biological Resource Division of the United States Geological Survey (BRD/USGS), the EPA, the USACE, the U. S. Army Garrison-Hawai'i (USAG-HI), the Hawai'i State Historic Preservation Office (SHPO), the National Advisory Council on Historic Preservation (ACHP), and the State of Hawai'i Office of Hawai'ian Affairs (OHA).

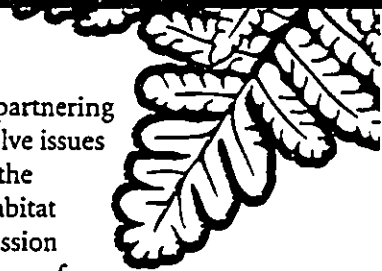
Over the past ten months there have been numerous coordination meetings with agencies and citizen groups to ensure that all project impacts and comments or concerns have been adequately addressed. Mitigation commitment agreements are currently being developed and will be discussed in the Final EIS. By law, all agreements ensuring that mitigation will be implemented must be executed and included in the Record of Decision (ROD) which follows the Final EIS and formalizes a Selected Alternative. The ROD is a legally binding document upon the FHWA requiring implementation of mitigation measures stipulated in the Final EIS.

## Agreements Reached

In June 1998, an interagency partnering session was conducted to resolve issues related to implementation of the Saddle Road Palila Critical Habitat mitigation. This partnering session was the culmination of two years of informal and formal consultation in developing the multi-agency mitigation plan. U.S. Senator Daniel K. Inouye provided the key-note introduction to open this pivotal partnering session. After in-depth analysis and discussion, concurrence was reached on a Memorandum of Understanding (MOU) that identifies the parties responsible for implementation of the mitigation plan. The MOU signatory parties were the Department of the Army (USAG-HI and the Military Traffic Management Command), the State of Hawai'i (DLNR and HDOT), USFWS, BRD/USGS and the FHWA. The MOU includes a schedule of key mitigation plan elements and proposed agency responsibilities. There is also a stipulation in the MOU that the FHWA, through its Hawai'i Division Office, will monitor the implementation of the mitigation plan over the required 10 year period to ensure plan delivery as specified in the MOU.

The mitigation plan includes the setting aside of some 10,000 acres to be used for Palila mitigation. The mitigation areas include approximately 4,604 acres near Pu'u Mali adjacent to the north boundary of the Mauna Kea Forest Preserve, 1,738 acres within the Ka'ohe Lease Lands on the west slope of Mauna Kea, and 2,998 acres located within the Kipuka 'Alalā area of Pōhakuoa Training Area. These lands are to be managed according to stipulations in the MOU.

The Pu'u Mali lands and the Ka'ohe Lease Lands are now being used for ranching. DLNR is currently working on settlements with the ranchers in order to terminate these partial leases. The mitigation lands will be managed by DLNR solely for restoration of mamane forest and relocation of Palila and will require the removal of pests and predators to facilitate the success of the relocation program. Roughly half of the estimated total cost of \$13.7 million for the 10 year mitigation plan is for road improvement features that reduce the likelihood of wildfires, construction contract requirements that provide protection for biologically sensitive areas, and administrative and settlement costs to put the mitigation lands in place.



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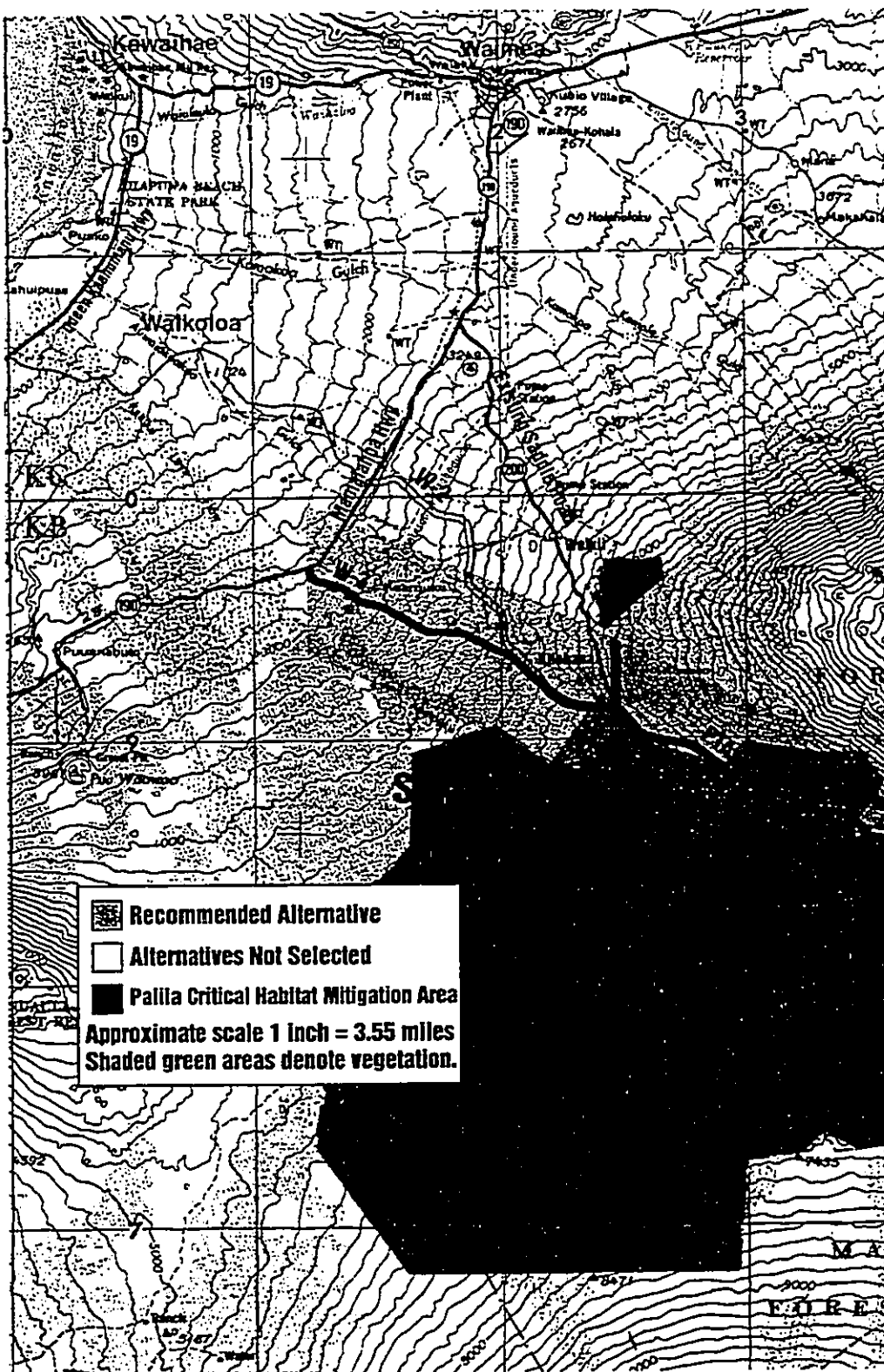
The Final Biological Opinion (BO) of the USFWS has been received and the stipulations of the Palila mitigation MOU were incorporated within this document. A detailed mitigation implementation plan schedule is now under development and will be included within the Final EIS.

Another milestone was achieved last month when the FHWA and the EPA reached a consensus on recommended route selection in Section IV (Kaūmana) and wetland mitigation measures in Sections III and IV. The FHWA committed to ensure adherence to a "no net loss" of wetlands policy. Modifications that will appear in the Final EIS include language committing to native habitat preservation and restoration within or adjacent to the right-of-way as part of wetlands mitigation in these Sections.

Studies addressing impacts to historic sites and traditional cultural properties are currently being finalized. Work is now underway to finalize a Memorandum of Agreement (MOA) among the FHWA, the SHPO, and the ACHP regarding mitigation of roadway impacts to 19 identified historic sites and Mauna Kea. This executed MOA will be included in the Final EIS.

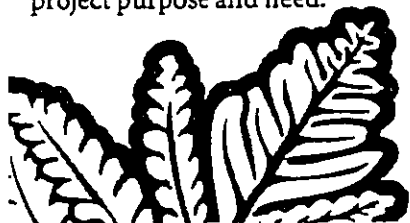
## Recommended Alternative Selection

Following the issuance of the Draft EIS and the close of the formal public comment period, and in consideration of the full record of scientific and technical information developed for the project as well as the public input received, the SEE Team identified Segments W-3, PTA-1, EX-3, and E-3 as their recommendation to the FHWA for the final alignment for Saddle Road improvements. The FHWA agreed and has adopted these four segments as the Recommended Alternative. The No Action Alternative was not selected because it would not satisfy the project purpose and need.



## Purpose and Need

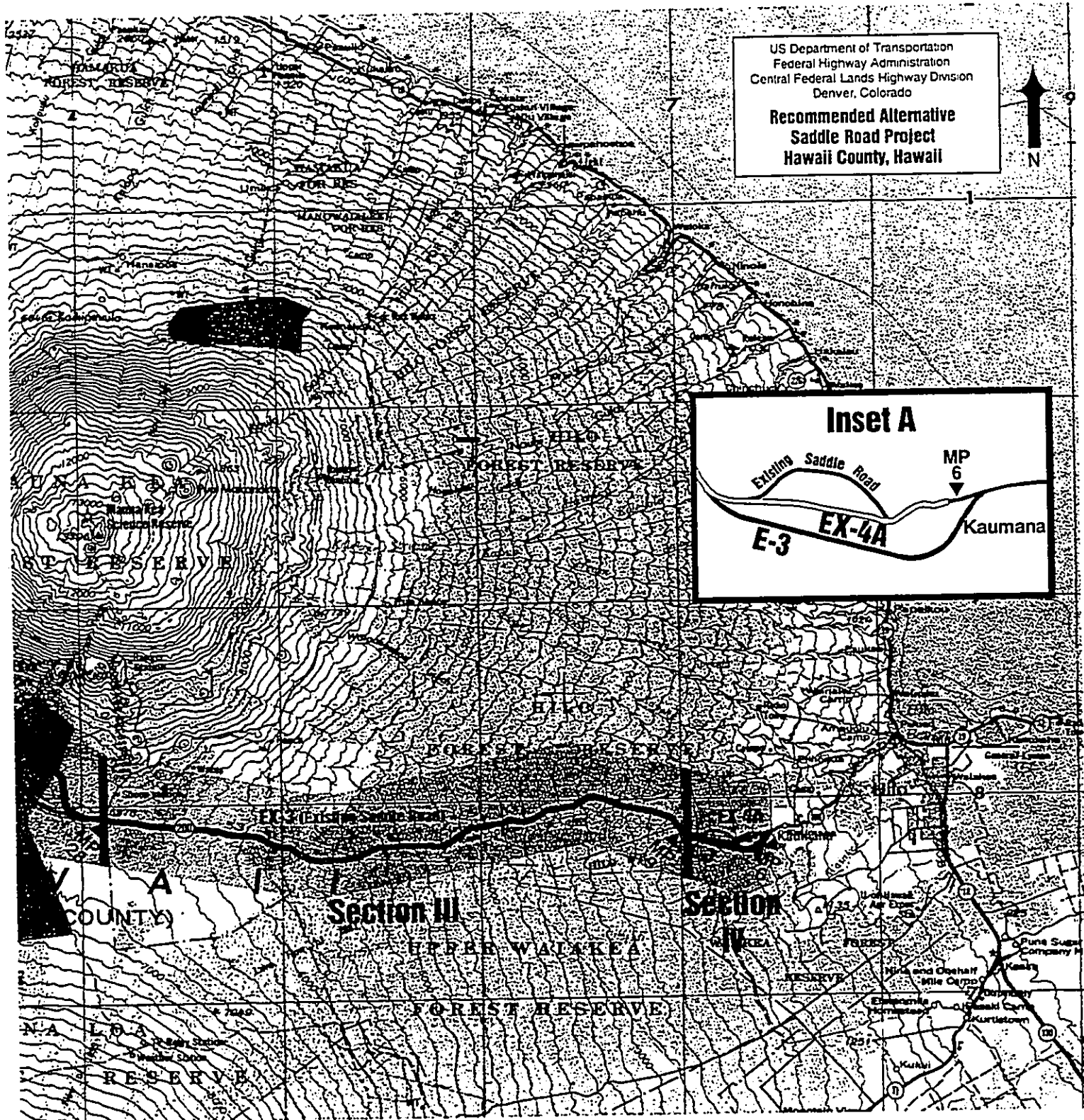
Proposed improvements to Saddle Road address five general types of needs or existing roadway deficiencies: roadway geometric and pavement deficiencies, conflicts and hazards associated with combined public and military use of the road, traffic carrying capacity deficiencies, motorist safety



[www.saddleroad.com](http://www.saddleroad.com)



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problems, and social demand and economic development. The primary purpose of this project is to provide a safe and efficient route for access to and between land uses along Saddle Road and for cross-island traffic between East and West Hawai'i.

#### Section I

Perhaps the most notable consideration in the selection of W-3 was its efficiency for serving cross-island traffic because the largest percentage of motorists using Saddle Road are coming from or going to Kona. For Saddle Road traffic with Kona as its origin and destination, Segment W-3 provides a

3.7 mile shorter trip than W-2. Another popular origin and destination for Saddle Road motorists is Waimea. Segment W-3 is shorter than W-2, which partially compensates for the fact that W-3 intersects the Mamalahoa Highway farther from Waimea. Therefore, W-3 is only marginally less convenient than W-2 for serving Waimea traffic. In terms of overall time and fuel savings, Segment W-3 would result in greater benefits to Saddle Road motorists and the community as a whole.

Further, based on the information available on terrain and geology, and the shorter length of W-3, the FHWA expects that Segment W-3 will prove less costly to build than W-2 when final design and cost estimates are completed. Traffic operations would also be more efficient on W-3 because of less steep grades.

The FHWA also considered public opinion regarding the selection of recommended alternatives. With the proximity of W-2 to Waiki'i Ranch, landowners and residents in this community stated their goal to preserve their pastoral lifestyle and expressed concern that the siting of Saddle Road on the W-2 alignment would result in noise pollution and would impact the commercial viability of their properties. In consideration of community benefits, construction cost savings, and other reasons noted, Segment W-3 was selected as the recommended alternative for Section I.

## Section II

The most notable consideration in the selection of a recommended alternative within Section II is that EX-2 would not completely fulfill the project purpose and need. With Segment EX-2, no improvement in the quality and safety of military training would be anticipated and existing conflicts between the military and the public would be only partially removed.

In contrast, selection of either PTA-1 or PTA-3 would completely satisfy the project purpose and need, but would result in a direct modification of Palila Critical Habitat (103 acres for PTA-1, 114 acres for PTA-3). As stated by the USFWS, however, it is expected that the mitigation measures built into the project design will offset the modifications being made to Palila Critical Habitat and enhance the likelihood of survival and recovery of the Palila.

The most notable difference between PTA-1 and PTA-3 is that PTA-1 is approximately 1.0 mile shorter and would provide a more direct alignment. PTA-1 would be less costly to construct and would impact less native habitat and less Palila Critical Habitat. In consideration of the anticipated benefits of the mitigation measures developed for the Palila and the other reasons noted, PTA-1 was selected as the recommended alternative for Section II.

## Section III

No reasonable or prudent alternatives to following the existing road corridor (Segment EX-3) were identified in Section III. After much discussion and investigation of potential alternative routes, it was concluded that all other alternatives would provide notably greater impacts to adjacent resources. For this reason, Segment EX-3 was selected as the recommended alternative for Section III.

## Section IV

The construction of Saddle Road on Segments EX-4A or E-3 would require the fill of jurisdictional wetlands (1.0 acres with EX-4A, and 7.9 acres with E-3). While E-3 would result in the fill of more wetland resources, approximately 6.7 acres of this wetland area consist of degraded habitat (damaged by grazing or other uses) and agricultural fields supporting very little native vegetation. EX-4A would disturb 1.0 acre of native habitat, compared with 1.3 acres for E-3, and therefore, the impacts to biological resources were determined to be roughly equivalent for these two segments.

While EX-4A would impact less wetland resources, it cuts through the community of Kaūmana and would require the acquisition of residential property and the relocation of 11 to 28 households. It would approach or exceed the national noise abatement criteria at 29 residences, would cause a substantial increase in noise at 18 additional ones, and would result in serious community disruption. In addition, when considering initial construction and long-term motorist operating costs, EX-4A would be the more costly segment over the life of the project. For these reasons, Segment E-3 was selected as the recommended alternative for Section IV.

## Projected Timeline

From now until the end of 1998, the project team is resolving outstanding issues and revising information for inclusion into the Final EIS. Release of the Final EIS is now scheduled for late February or early March 1999. The Record of Decision (ROD) confirming the Selected Alternative will then be issued in late March or early April. It is anticipated at this time that the Selected Alternative in the ROD will be the same as the Recommended Alternative in the Final EIS. The ROD is a legal document that is binding on the FHWA and any participating agencies for completion of all project requirements including mitigation measures.

Roadway design within the Pōhakuoa Training Area (PTA) in Section II would begin immediately after the signing of the ROD. Estimated completion time for roadway design and engineering is one year. As soon as this design phase is finalized, the construction project will be advertised for bid. Construction is expected to begin on a project within PTA in late 2000.

**SECTION 2 - HEARING TRANSCRIPT AND ASSOCIATED DOCUMENTATION**



## SECTION 2 - HEARING TRANSCRIPT AND ASSOCIATED DOCUMENTATION

The Saddle Road DEIS was made available for public and agency review on November 7, 1997 at the following locations.

Kaimuki Regional Library Honolulu, Hawai'i	Hilo Public Library Hilo, Hawai'i	Kahului Regional Library Kahului, Hawai'i
Kailua-Kona Public Library Kailua-Kona, Hawai'i	Pearl City Regional Library Pearl City, Hawai'i	Thelma Parker Memorial Library Kamuela, Hawai'i
University of Hawai'i, Hilo Campus Library Hilo, Hawai'i	Kaneohe Regional Library Kaneohe, Hawai'i	Hawai'i State Library Honolulu, Hawai'i
University of Hawai'i at Manoa, Hamilton Library Honolulu, Hawai'i	University of Hawai'i at Manoa, Sinclair Library Honolulu, Hawai'i	Legislative Reference Bureau Honolulu, Hawai'i
Hawai'i County, Department of Public Works Hilo, Hawai'i	FHWA, Hawai'i Division Office Honolulu, Hawai'i	FHWA Central Federal Lands Division Quality Control Lakewood, Colorado
State of Hawai'i, Office of Environmental Quality Control Honolulu, Hawai'i	Directorate of Public Works Wheeler Army Airfield Schofield Barracks, Hawai'i	HDOT Hawai'i District Hilo, Hawai'i
PTA Headquarters Hilo, Hawai'i	Hawai'i DOT, Highways Division, Planning Branch Honolulu, Hawai'i	

Two hearings were held following the issuance of the DEIS for the proposed Saddle Road improvements. One was held in Waikoloa on Thursday, December 11, 1997; the second was held in Hilo on Saturday, December 13, 1997. Associated correspondence, public notices, and associated affidavits of publication are enclosed in Section 2.1 of this FEIS - Part II. The hearing transcripts, which contain public hearing testimony, are included in their entirety in Section 2.2, FEIS-Part II. The formal comment period extended from November 7 to December 22, 1997. Copies of the FEIS-Parts I, II, and III, have been distributed to the above locations for public review.

**2.1 Associated Documentation for Availability of DEIS and Public Hearings**



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

OCT 15 1997

In Reply Refer To:  
HPD-16E(Saddle Road)

Mr. Gary Gill  
Director  
Office of Environmental Quality Control  
220 South King Street  
Honolulu, HI 96813

Dear Mr. Gill:

The U.S. Department of Transportation, Federal Highway Administration (FHWA), Central Federal Lands Highway Division (CFLHD), in cooperation with the Hawaii Department of Transportation (HDOT), has completed a Draft Environmental Impact Statement for proposed Defense Access Road project A-AD-6(1), Saddle Road (SR 200), from the Mamalahoa Highway (SR 190) to Mile Post 6 near Hilo. The CFLHD and HDOT, along with other agencies involved in project development, have reviewed the document and have determined that it satisfactorily complies with Chapter 343, HRS, and Title 11, Chapter 200, HAR.

Enclosed are five (5) copies of the Draft EIS, a publication notice for the *OEQC Environmental Notice*, and a distribution list for the EIS. We trust that the content and timing of this submittal will permit publication of the availability of the Draft EIS in the November 8, 1997 edition of the *Notice*. Please contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924, if you have any questions.

Sincerely yours,

Larry D. Henry, P.E.  
Project Development Engineer

Enclosures

cc (w/enclosure):

Honorable Daniel K. Inouye, U.S. Senator, 300 Ala Moana Blvd., Suite 7325, Honolulu,  
HI 96850  
Honorable Benjamin Cayetano, Governor, State of Hawaii, State Capitol, Honolulu,  
HI 96813  
Mr. Kazu Hayashida, Director, HDOT, 869 Punchbowl Street, Honolulu, HI 96813-5097  
Mr. Abraham Y. Wong, Division Administrator (HAD-HI), FHWA, Box 50206, Honolulu,  
HI 96850  
Mr. Donald Okahara, Principal, Okahara & Associates, 200 Kohola Street, Hilo, HI 96720

OEQC ENVIRONMENTAL NOTICE PUBLICATION FORM

TITLE OF PROJECT: Saddle Road Improvement

LOCATION: ISLAND Hawaii DISTRICT Hilo  
TAX MAP KEY: 3rd District: Various Zones, Sections, Plats & Parcels

PLEASE CHECK THE FOLLOWING CATEGORIES:

Type of Action: Agency  Applicant

Applicable State of Federal Statute:

Chapter 343, HRS  Chapter 205A, HRS  NEPA

Type of Document

Draft Environmental Assessment (Negative Declaration Antic.)  Draft EIS  NEPA NOP

Final Environmental Assessment (Negative Declaration)  Final EIS  NEPA Draft EIS

Final Environmental Assessment (EIS Preparation Notice)  NEPA FONSI  NEPA Final EIS

Type of Revision (if applicable)

Revised  Supplemental  Addendum  Other (explain)

Prior to general distribution, please submit to OEQC: 4 copies of the Draft EA, Final EA (Negative Declaration or EIS Preparation Notice), 4 copies of the Draft EIS or Final EIS (For Draft and Final EISs an additional copy is mailed to OEQC)

PROPOSING AGENCY OR APPLICANT SHOULD SUBMIT COPIES OF THE DOCUMENTS TO THE APPROVING AGENCY OR ACCEPTING AUTHORITY PRIOR TO SUBMITTING COPIES TO OEQC.

APPROVING AGENCY OR ACCEPTING AUTHORITY:

Governor, State of Hawaii

ADDRESS: State Capitol  
Honolulu, HI 96813

CONTACT: Benjamin Cayetano

PHONE: (808) 586-0034

PROPOSING AGENCY OR APPLICANT:

Federal Highway Administration

ADDRESS: 555 Zang Street  
Lakewood, CO 80228

CONTACT: Bert McCauley

PHONE: (303) 969-5924

CONSULTANT:

Okahara & Associates

ADDRESS: 200 Kohola Street  
Hilo, HI 96720

CONTACT: Donald Okahara

PHONE: (808) 961-5527

COMMENT PERIOD END DATE:

December 22, 1997

CONDITIONS WHICH TRIGGERED THE EIS LAW: PLEASE CHECK ALL THAT APPLY TO THE PROPOSED ACTION:

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Use of State or County lands or funds<br>HRS 343-5(a)(1) | <input type="checkbox"/> Use of lands in the Waikiki Special District<br>HRS 343-5(a)(5)          |
| <input checked="" type="checkbox"/> Use of Conservation District Lands<br>HRS 343-5(a)(2)    | <input type="checkbox"/> Amendment to a County General Plan<br>HRS 343-5(a)(6)                    |
| <input type="checkbox"/> Use of Shoreline Setback Area<br>HRS 343-5(a)(3)                    | <input type="checkbox"/> Reclassification of Conservation Lands<br>HRS 343-5(a)(7)                |
| <input type="checkbox"/> Use of Historic Site or District<br>HRS 343-5(a)(4)                 | <input type="checkbox"/> Construction or modification of helicopter facilities<br>HRS 343-5(a)(8) |

OTHER CONDITIONS:

- Use of Special Management Area (City and County of Honolulu)  
 Other\*

\* If the project does not trigger HRS 343, please explain why document is being submitted to OEQC.

SUMMARY of the proposed action or project to be published in the OEQC Bulletin. Please submit it as a summary ready for publication. The description should be brief (300 words or less), yet provide sufficient detail to convey the full impact of the proposed action.

The project proposes to improve Saddle Road (SR 200) between the Mamalahoa Highway (SR 190) and Mile Post 6 near Hilo, Hawaii. Twelve action alternatives under consideration incorporate use of the existing alignment and potential new alignments. The action alternatives reconstruct the existing substandard two-lane roadway to a two-lane roadway with shoulders to adequately handle an anticipated year 2014 average daily traffic volume of 14,000 vehicles per day at a design speed of 80 to 100 kilometers per hour. The existing Saddle Road is a narrow two-lane road with steep grades, sharp curves, and poor pavement with no shoulders and passes through key training areas of the U.S. Department of the Army's Pohakuloa Training Area (PTA), creating conflict between motorists and military training units. The proposed project will improve pavement condition, increase safety and capacity, improve quality of traffic flow, decrease cross-island travel times, and stimulate economic growth and development. Some alternatives will realign the road within the PTA to minimize conflicts between military and public uses. Substantive issues include protected species of flora and fauna, Critical Habitat for the Endangered Palila, wetlands and biological habitats of importance, archaeological resources, fire hazards, potential residential displacements, and traffic noise.



U.S. Department  
of Transportation  
Federal Highway  
Administration

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

OCT 15 1997

In Reply Refer To:  
HPD-16E(Saddle Road)

U.S. Environmental Protection Agency  
Office of Federal Activities  
NEPA Compliance Division, EIS Filing Section  
Ariel Rios Building (South Oval Lobby)  
Mail Code 2252-A, Room 7241  
1200 Pennsylvania Avenue, NW  
Washington, DC 20044

Attention: Ms. Pearl Young

Gentlemen:

Pursuant to your conversation with Mr. Bert McCauley of this office on October 14, we are enclosing five (5) copies of the Draft Environmental Impact Statement (DEIS) and five (5) copies of the complete Technical Appendices for the proposed improvement of Hawaii State Route 200 (SR 200), Saddle Road, from the Mamalahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawaii. To meet our Public Hearing schedule and close of a comment deadline in December, we are requesting publication in the Federal Register of a *Notice of Availability* for this DEIS on Friday, November 7, 1997.

Public Hearings will be held at the following locations for the dates and times given:

Thursday, December 11, 1997, 7:00 - 10:00 P.M.  
Royal Waikoloan, King's Ballroom  
60-275 Waikoloa Beach Drive  
Waikoloa, Hawaii

Saturday, December 13, 1997, 9:00 - 12:00 P.M.  
University of Hawaii-Hilo, Wentworth 1  
200 West Kawili Street  
Hilo, Hawaii

Copies of the DEIS are available for public review at the following locations:

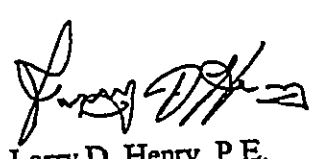
Federal Highway Administration, 555 Zang St., Lakewood, CO;  
Federal Highway Administration, Hawaii Div., Federal Bldg., Punchbowl St., Honolulu, HI;  
Hawaii Dept. of Transportation, 600 Kapiolani Blvd., Honolulu, HI;  
County of Hawaii, 25 Aupuni St., Hilo, HI;  
U.S. Army Garrison-Hawaii, Dept. of Public Works, Bldg. 300, Scholfield Barracks, HI;  
U.S. Army Garrison-Pohakuloa Training Area, Milepost 36, State Route 200, Hilo, HI; and

the following libraries:

- Kaimuki Regional Library,
- Pearl City Regional Library,
- Hamilton Library at UH at Manoa,
- Kailua-Kona Public Library,
- Kaneohe Regional Library,
- UH Hilo Campus Library,
- Sinclair Library at UH at Manoa,
- Hilo Public Library,
- Hawaii State Library,
- Kahului Regional Library, and the
- Thelma Parker Memorial Library.

If additional information is required, please contact Mr. Bert McCauley, Environmental Project Manager at (303) 969-5924. Thank you for your assistance.

Sincerely yours,



Larry D. Henry, P.E.  
Project Development Engineer

cc (w/o enclosures):

- Honorable Daniel K. Inouye, U.S. Senator, 300 Ala Moana Blvd., Suite 7325, Honolulu, HI 96850
- Mr. Kazu Hayashida, Director, HDOT, 869 Punchbowl Street, Honolulu, HI 96813-5097
- Mr. Abraham Y. Wong, Division Administrator (HAD-HI), FHWA, Box 50206, Honolulu, HI 96850
- James T. Harai*  
Col. Owen D. Ryan, Commander, HQ, U.S. Army Garrison-Hawaii, Attn: APVG-GC, Bldg. 580, Room 100, Schofield Barracks, HI 96857-5000
- LTC David Hergenroeder, Commander, HQ, PTA, USAG-HI, Bldg T-180, Milepost 36, H200 (Saddle Road), Hilo, HI 96720
- Ms. Donna Fay K. Kiyosaki, Chief Engineer, Hawaii County Department of Public Works, 25 Aupuni St., Room 202, Hilo, HI 96720-4252
- Mr. Donald Okahara, Principal, Okahara & Associates, 200 Kohola St., Hilo, HI 96720

RECEIVED AS FOLLOWS

DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

[Docket No. ER98-99-000]

Southern California Edison Company; Notice of Filing

November 3, 1997.

Take notice that Southern California Edison Company on October 9, 1997, tendered for filing a Notice of Cancellation of FERC Rate Schedule No. 248.38, and all supplements thereto.

Any person desiring to be heard or to protest said filing should file a motion to intervene or protest with the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426, in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211 and 18 CFR 385.214). All such motions or protests should be filed on or before November 14, 1997. Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a motion to intervene. Copies of this filing are on file with the Commission and are available for public inspection.

Linwood A. Watson, Jr.,  
Acting Secretary.

[FR Doc. 97-29430 Filed 11-6-97; 8:45 am]  
BILLING CODE 6717-01-M

DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

Notice of Application Filed With the Commission

November 3, 1997.

Take notice that the following hydroelectric application has been filed with the Commission and is available for public inspection:

- a. *Type of Application:* Proposed Recreation Plan.
- b. *Project No.:* 1494-148.
- c. *Date Filed:* October 3, 1997.
- d. *Applicant:* Grand River Dam Authority.
- e. *Name of Project:* Pensacola.
- f. *Location:* The Pensacola Project is located on the Grand (Neosho) River in Craig, Delaware, Mayes, and Ottawa Counties, Oklahoma.
- g. *Filed Pursuant to:* Federal Power Act, 16 U.S.C. § 791(a)-825(r).
- h. *Applicant Contact:* Robert W. Sullivan, Jr. Grand River Dam Authority

P.O. Box 409 Vinita, OK 74301 (918) 256-5545.

i. *FERC Contact:* Jon Cofrancesco, (202) 219-0079.

j. *Comment Date:* December 08, 1997.

k. *Description of Project:* Grand River Dame Authority, licensee for the Pensacola Project, filed a long-term recreation plan for the project under article 407 of the project license. The proposed recreation plan addresses existing and future recreation use and development, safe recreational boating, and shoreline development. Further, the licensee outlines its proposed management and maintenance practice for recreation uses at the project. As required under article 407, the licensee consulted with the Oklahoma Tourism and Recreation Department, the U.S. Fish and Wildlife Service, and the National Park Service in preparing the proposed plan.

1. This notice also consists of the following standard paragraphs: B, C1, and D2.

B. *Comments, Protests, or Motions to Intervene*—Anyone may submit comments, a protest, or a motion to intervene in accordance with the requirements of Rules of Practice and Procedure, 18 CFR 385.210, .211, .214. In determining the appropriate action to take, the Commission will consider all protests or other comments filed, but only those who file a motion to intervene must be received on or before the specified comment date for the particular application.

C1. *Filing and Service of Responsive Documents*—Any filings must bear in all capital letters the title "COMMENTS",

"RECOMMENDATIONS FOR TERMS AND CONDITIONS", "PROTEST", or "MOTION TO INTERVENE", as applicable, and the Project Number of the particular application to which the filing is in response. Any of these documents must be filed by providing the original and 8 copies provided by the Commission's regulations to: The Secretary, Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426. Motions to intervene must also be served upon each representative of the Applicant specified in the particular application.

D2. *Agency Comments*—The Commission invites Federal, state, and local agencies to file comments on the described application. (Agencies may obtain a copy of the application directly from the applicant). If an agency does not file comments within the time specified for filing comments, the Commission will presume that the agency has none. One copy of an

agency's comments must also be sent to the Applicant's representatives.

Linwood A. Watson, Jr.,

Acting Secretary.

[FR Doc. 97-29432 Filed 11-6-97; 8:45 am]

BILLING CODE 6717-01-M

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-5485-8]

Environmental Impact Statements; Notice of Availability

*Responsible Agency:* Office of Federal Activities, General Information (202) 564-7167 OR (202) 564-7153.

Weekly receipt of Environmental Impact Statements Filed October 27, 1997 Through October 31, 1997 Pursuant to 40 CFR 1506.9.

EIS No. 970416, DRAFT EIS, FHW, HI, Saddle Road (HI-200) Improvements between Mamalahoa Highway HI-190) to Milepost 6 near Hilo, Funding, NPDES and COE Section 404 Permit, Hawaii County, HI, Due: December 22, 1997, Contact: Bert McCauley (303) 969-5924.

EIS No. 970417, FINAL EIS, BLM, CA, Castle Mountain Mine Open Pit Heap Leach Gold Mine Expansion Project, Plan of Operations Modification and Mine and Reclamation Plans Amendment, Approvals, San Bernardino County, CA, Due: December 08, 1997, Contact: George R. Meckfassel (619) 326-7000.

EIS No. 970418, DRAFT EIS, AFS, LA, Kisatchie National Forest Revision Land and Resource Management Plan, Implementation, Claiborne, Grant, Natchitoches, Rapides, Vernon, Webster and Winn Parishes, LA, Due: January 31, 1998, Contact: Danny W. Britt (318) 473-7160.

EIS No. 970419, FINAL EIS, FHW, NY, NY-17 Highway Conversion from a Partial to a Full Access Control Facility, Five-Mile Point to Occanum and NY-17 Rehabilitation or Reconstruction, Funding and COE Section 404 Permit Issuance, Towns of Kirkwood and Windsor, Broome County, NY, Due: December 08, 1997, Contact: Harold J. Brown (518) 431-4127.

EIS No. 970420, FINAL EIS, DOA, HI, Waimea-Paauilo Watershed Project, To Alleviate the Agricultural Water Shortage, Watershed Protection and Flood Prevention, COE Section 404 Permit, Hawaii County, HI, Due: December 08, 1997, Contact: Kenneth M. Kaneshiro (808) 541-2600.

EIS No. 970421, FINAL EIS, FHW, MO, MO-5 Corridor Transportation





U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

**OCT 15 1997**  
In Reply Refer To:  
HPD-16E(Saddle Road)

**AGENCIES, ORGANIZATIONS, AND CITIZENS:**

Enclosed is a copy(s) of the Draft Environmental Impact Statement for the proposed improvement of State Route 200, Saddle Road, from the Mamalahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawai'i. Open-house format public hearings will be held to provide opportunities for citizens to learn more about the proposed improvement and to present oral and/or written comments. Displays will include visual simulations or illustrations and maps of the project area. Representatives from the Federal Highway Administration, the Hawai'i Department of Transportation, the U.S. Army Garrison-Hawai'i, and Hawai'i County will be available to answer questions. A court recorder will be available to take formal comments for the public hearing record. The public hearings will be as follows:

Thursday, December 11, 1997, 7:00 - 10:00 PM  
Royal Waikoloan, King's Ballroom  
60-275 Waikoloa Beach Drive  
Waikoloa, Hawai'i

Saturday, December 13, 1997, 9:00 - 12:00 PM  
University of Hawai'i-Hilo, Wentworth 1  
200 West Kawili Street  
Hilo, Hawai'i

We invite all interested persons to attend these hearings. Comments may also be sent to: the Federal Highway Administration, 555 Zang Street (Room 259), Lakewood, CO 80228. Attention: HPD-16, Saddle Road. Comments received by December 22, 1997, will become a part of the official public hearing record.

Sincerely yours,

Larry D. Henry, P.E.  
Project Development Engineer

Enclosure(s)

**AFFIDAVIT OF PUBLICATION**

State of Hawaii )  
                  ) SS:  
County of Hawaii )

LEILANI K. R. HIGAKI

being first

duly sworn, deposes and says:

1. That she is the BUSINESS MANAGER of  
HAWAII TRIBUNE-HERALD, LTD. a  
newspaper published in the City of HILO  
State of Hawaii.

2. That the "PROPOSED SADDLE ROAD PROJECT- NOTICE OF PUBLIC HEARING  
AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT STATEMENT etc.,  
" of which a clipping from the newspaper  
as published is attached hereto, was published in said newspaper on the following  
date(s) November 11, December 3, 19 97 (etc.).  
#092929

*Leilani K.R. Higaki*

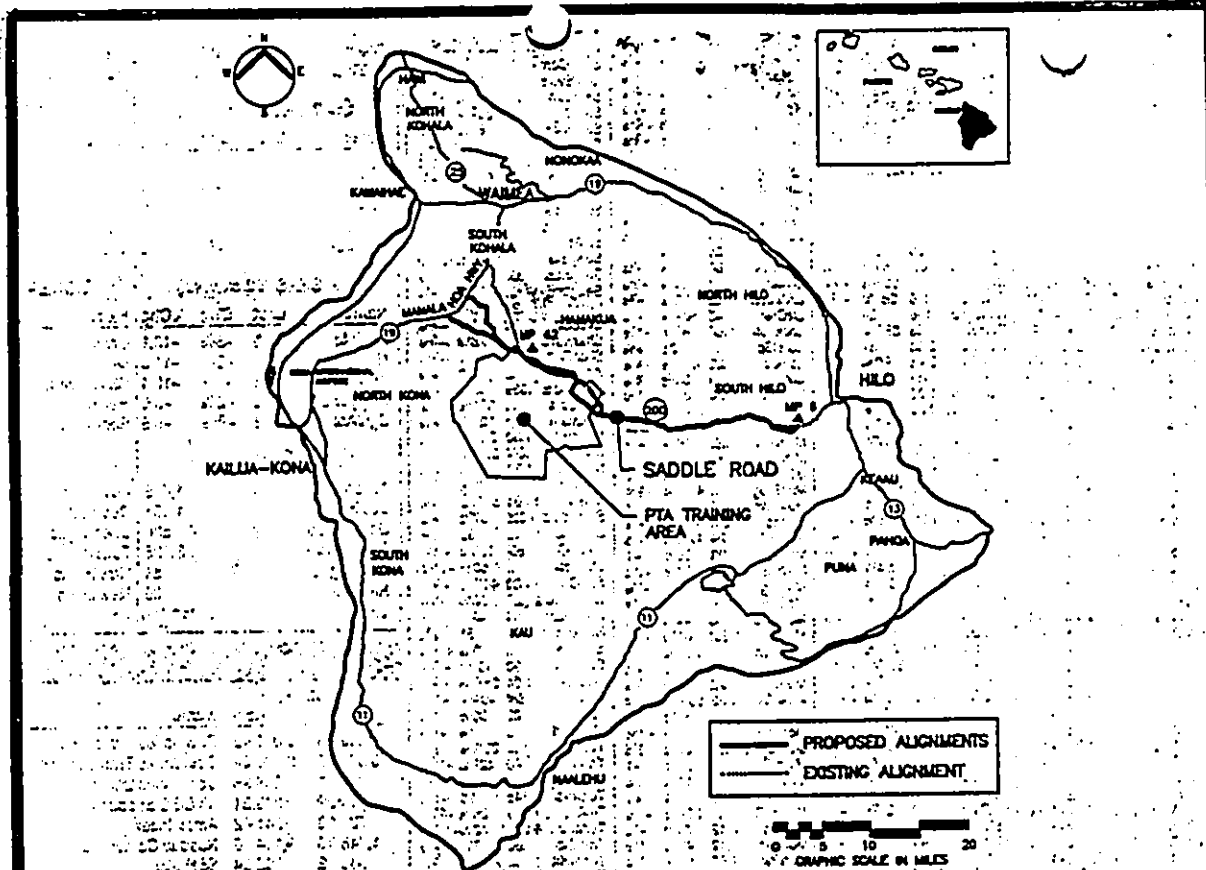
Subscribed and sworn to before me  
this 9th day of December, 19 97

*Ch. H.P. Ojima*  
Notary Public, Third Circuit,  
State of Hawaii

My commission expires October 1, 2000

IPH

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## PROPOSED SADDLE ROAD PROJECT

### NOTICE OF PUBLIC HEARING AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Hawaii Department of Transportation (HDOT), Highways Division, and the Federal Highway Administration, Central Federal Lands Division (FHWA) announce the availability of the Draft Environmental Impact Statement (DEIS) for proposed improvements to Saddle Road (SR 200) between the Mammalahoa Highway (SR 190) and Milepost 6 near Hilo, Hawaii, in the County of Hawaii. Twelve Action Alternatives under consideration incorporate use of the existing alignment and potential new alignments. The No-Action Alternative is also considered. The Action Alternatives propose to reconstruct the existing two-lane roadway to a two-lane roadway with 12-foot lanes and 8-foot shoulders for a design speed of 50 to 60 miles per hour. The existing road is a narrow, substandard two-lane road with steep grades, sharp curves, poor pavement, no shoulders, and inadequate roadside recovery areas. The existing road passes through the U.S. Department of the Army's Pohakuloa Training Area (PTA) creating conflicts between public motorists and military training units. The proposed project will improve pavement condition, increase motorist safety, improve the quality and capacity of traffic flow, and decrease cross-island travel times. Some Action Alternatives will realign the road within the PTA to minimize conflicts between the military and public uses.

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To ensure that all significant issues are identified and the full range of issues related to this proposed project are addressed, comments and suggestions are invited from all interested parties. If you wish to comment, please mail or delivery any comments you may have to any one (1) of the three (3) following addresses:

Mr. Abraham Y. Wong, Division Administrator  
Federal Highway Administration  
Box 50206,  
300 Ala Moana Boulevard  
Honolulu, HI 96850

Mr. Kazu Hayashida, Director  
State of Hawaii,  
Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813

Mr. Larry C. Smith, Division Engineer  
Federal Highway  
Administration (HPD-16)  
555 Zang Street, Room 259  
Lakewood, Colorado 80228

2-11

All written comments should be legible, include your name (individual and/or organization) and return

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--	--	--

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Maps, drawings, technical studies, and pertinent information received as a result of coordination with other governmental agencies are available for public inspection and copying at the following locations:

Federal Highway Administration Hawaii Division Office Prince Kuhio Federal Building 300 Ala Moana Boulevard, Room 3204 Honolulu, Hawaii 96850	Federal Highway Administration Central Federal Lands Division Project Development Office 555 Zang Street, 3rd Floor Lakewood, Colorado 80228
---	--

In addition, copies of the DEIS and Technical Appendices are available for public inspection at the following locations:

Kaimuki Regional Library 1041 Koko Head Avenue Honolulu, Hawaii	Pearl City Regional Library 1138 Waimano Home Road Pearl City, Hawaii	Hawaii State Library 478 South King Street Honolulu, Hawaii
Kailua-Kona Public Library 75-140 Hualalai Road Kailua-Kona, Hawaii	Kaneohe Regional Library 45-829 Kamehameha Hwy Kaneohe, Hawaii	Kahului Regional Library 90 School Street Kahului, Hawaii
Legislative Reference Bureau State Capitol, Rm 004 Honolulu, Hawaii	Hilo Public Library 300 Waiuanuenue Avenue Hilo, Hawaii	Thelma Parker Memorial Library 67-1209 Mamalahoa Hwy. Kamuela, Hawaii
University of Hawaii at Manoa Hamilton Library 2550 The Mall Honolulu, Hawaii	University of Hawaii at Manoa Sinclair Library 2425 Campus Road Honolulu, Hawaii	University of Hawaii Hilo Campus Library 200 W. Kawili Street Hilo, Hawaii
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State of Hawaii Office of Environmental Quality Control 220 South King Street, 4th Floor Honolulu, HI	Hawaii County Department of Public Works 25 Aupuni Street, Room 202 Hilo, Hawaii	Hawaii Department of Transportation Hawaii District 50 Makaala Street Hilo, Hawaii
Hawaii Department of Transportation Highways Division, Planning Branch 600 Kapiolani Boulevard, Room 304 Honolulu, Hawaii	Pohakuloa Training Area Headquarters U.S. Army Garrison-Hawaii, Bldg T-180 Milepost 36, H200 (Saddle Road) Hilo, Hawaii	

Notice is also hereby given that the HDOT, Highways Division, and the FHWA, Central Federal Lands Division will also hold Public Hearings on the proposed Saddle Road project on December 11, 1997 at 7:00 p.m. in the King's Ballroom at the Royal Waikoloa Hotel, 69-275 Waikoloa Beach Drive, Waikoloa, Hawaii, and on December 13, 1997 at 9:00 a.m. in Wentworth Hall, Room 1 at the University of Hawaii-Hilo, 200 West Kawili Street, Hilo, Hawaii. The purpose of these Public Hearings is to present the proposed project, answer questions, and solicit written comments or oral testimony from those who have an interest in the project. Oral testimony will be transcribed verbatim and will receive the same evaluation as written comments. The public is invited to attend. Persons unable to attend or desiring not to present oral project. To be considered, such statements and/or written comments must be submitted, received by mail, or otherwise delivered to any one (1) of the three (3) addresses listed above for comments by December 22, 1997.

**KAZU HAYASHIDA**  
Director of Transportation  
Hawaii Department of Transportation

**LARRY SMITH**  
Division Engineer  
Federal Highway Administration

(092929-Hawaii Tribune-Herald: November 11, December 3, 1997)

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IN THE MATTER OF  
NOTICE OF PUBLIC HEARING & AVAILABILITY  
OF DRAFT ENVIRONMENTAL IMPACT STATEMENT

AFFIDAVIT OF PUBLICATION

STATE OF HAWAII  
City and County of Honolulu

SS.

P A G E N O N E

president for Times Super  
et Ltd., agreed: "I'm sure  
will go up." The state estima  
size of the increases likely  
d vary by industry and prod-  
by how competitive the mar-  
is and by how effective the  
reducing provision  
es to be, experts say.  
buyers are very sensitive to  
e increases. It may be very  
cult to pass all of that along.  
University of Hawaii econom-  
professor Jim Mak  
conomic consultant David  
nsour believes the expected  
ce increases could prompt peo-  
to curtail their spending.  
f consumption slows enough,  
ailers may be forced to lower  
ces to entice consumers back to  
registers, Ramsour said.  
And if today's disinflationary  
ctors — such as falling rents and  
ad values — still exist when the  
x changes take effect, the actual  
fect of the price increases could  
negligible beyond the first few  
onths, he said.  
"I don't see the total cost of  
ving being any higher," Ramsour  
aid. "It could even be lower."  
The dynamics of pricing are par-  
ticularly complicated because the  
xcise tax is applied at virtually all  
evels of transactions, creating the  
pyramiding effect.  
But the task force is proposing to  
educe a chunk of that pyramiding  
by paring the rate to 0.5 percent  
or wholesale service transactions,  
he same rate currently afforded  
ransactions involving wholesale  
oods.  
The wholesale-services change  
would result in about \$158 million  
n less revenue annually to the  
overnment, according to the task  
orce.  
It would work something like  
his:  
If a lawyer hires an accountant  
o help with a legal brief for a  
lient, the amount the accountant  
charges the lawyer would be taxed  
at the 0.5 percent rate — not the

Valerie L. Yanagihara *being duly sworn,*  
deposes and says that she is a clerk, duly authorized to execute  
this affidavit of the HAWAII NEWSPAPER AGENCY LIMITED  
PARTNERSHIP, a partnership of GANNETT PACIFIC CORPORA-  
TION, publisher of the HONOLULU ADVERTISER, and LIBERTY  
NEWSPAPERS LIMITED PARTNERSHIP, publisher of the  
HONOLULU STAR-BULLETIN, that said newspapers are newspa-  
pers of general circulation in the state of Hawaii, and that the  
attached notice is a true notice as was published in the  
aforereferenced newspapers as follows:

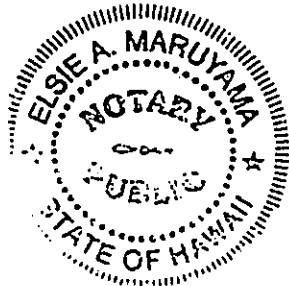
The Honolulu Advertiser: \_\_\_\_\_ times, on \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Honolulu Star-Bulletin: two times, on  
November 11, 1997  
December 3, 1997  
Sunday edition of The Honolulu Advertiser: \_\_\_\_\_ times, on \_\_\_\_\_  
\_\_\_\_\_

and that affiant is not a party to or in any way interested in the above  
entitled matter.

Subscribed and sworn to before me this 6th day of December  
A.D. 19 97

Elsie A. Maruyama

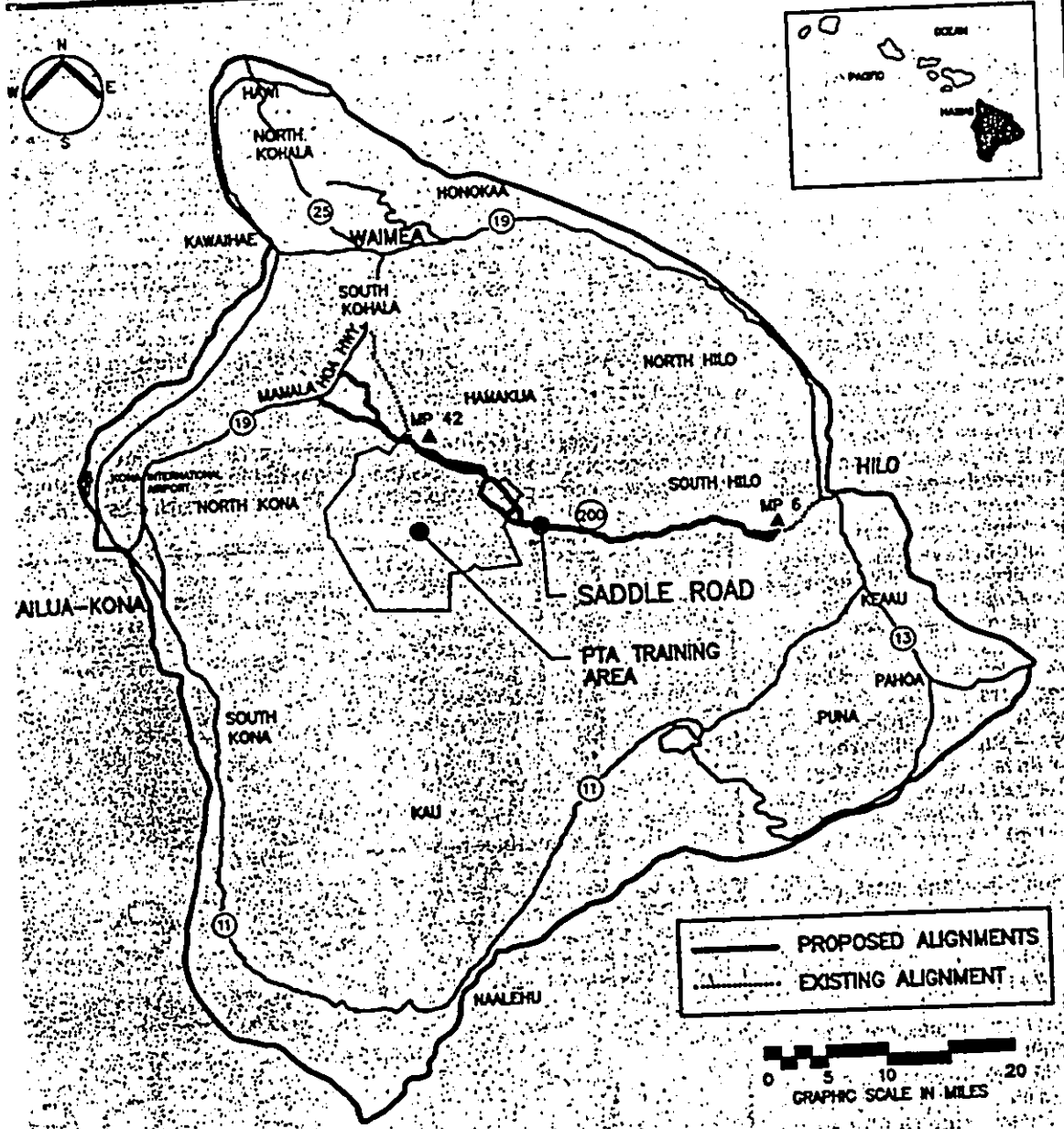
Notary Public of the First Judicial Circuit  
State of Hawaii  
My commission expires March 7, 2000



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OF DRAFT ENVIRONMENTAL IMPACT STATEMENT

OF PUBLICATION



PROPOSED SADDLE ROAD PROJECT

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being duly sworn,  
 authorized to execute  
 R AGENCY LIMITED  
 T PACIFIC CORPORA-  
 RTISER, and LIBERTY  
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 Hawaii, and that the  
 was published in the

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times, on \_\_\_\_\_

times, on \_\_\_\_\_

y interested in the above

5th day of December

icial Circuit

March 7, 2000

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Lakewood, Colorado

Pearl City Regional Library  
1138 Waimano Home Road  
Pearl City, Hawaii

Hilo Public Library  
3300 Waiānuā Avenue  
Hilo, Hawaii

Hawaii County Department of Public Works  
25 Aupuni Street, Room 202  
Hilo, Hawaii

University of Hawaii at Manoa  
Hamilton Library  
2550 The Mall  
Honolulu, Hawaii

Hawaii State Library  
478 South King Street  
Honolulu, Hawaii

Thelma Parker Memorial Library  
67-1209 Mamalahoa Hwy  
Kamuela, Hawaii

Kailua-Kona Public Library  
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Kailua-Kona, Hawaii

Kahului Regional Library  
90 School Street  
Kahului, Hawaii

Directorate of Public Works  
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Kaneohe, Hawaii

Hawaii Department of Transportation  
Highways Division, Planning Branch  
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Honolulu, Hawaii

Hawaii Department of Transportation  
Hawaii District  
50 Makaala Street  
Hilo, Hawaii

Legislative Reference Bureau  
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Honolulu, Hawaii

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Director of Transportation

LARRY SMITH  
Division Engineer  
Federal Highway Administration



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HAWAIIAN NEWS SERVICE, Honolulu, November 11, 1997

# South Korean economy is battered, but not broken

By REID G. MILLER  
Associated Press Writer

SEOUL, South Korea — The South Korean economy has been taking some sharp blows recently, with its currency reaching new lows against the dollar and major companies going bankrupt.

But the government is moving furiously to reassure investors that the pillars of its economy are firm, not shaky like some of those in Southeast Asia.

Last week, the government vehemently denied foreign news reports that South Korea had spent so much of its reserves in defending its currency, the won, that it was considering seeking a bailout from the International Monetary Fund, as its poorer Asian neighbors Thailand and Indonesia have been forced to do.

IMF chief Michael Camdessus backed up the South Korean claim, saying that while the country has been affected by the currency turmoil in Southeast Asia, the government's countermeasures so far seem adequate.

"I don't believe the situation in South Korea is as alarming as the one in Indonesia a couple of weeks ago," Camdessus said in Paris last Thursday.

Those reassurances didn't stop currency speculators from pounding the won anew this week, pushing it to a record low against the dollar Monday despite repeated market intervention by South Korea's central bank. Korean financial authorities have promised to continue defending the currency by selling dollars for won in the open market.

In another effort to win back confidence from investors, the government is expected to take further measures this week to shore up its financial system, moving to restructure the merchant banking sector and allowing state-run corporations to increase borrowing from abroad.

Word of those measures cheered investors in the South Korean stock market, where stock prices surged 5.9 percent Monday. Stocks had fallen by 6.9 percent Friday and 3.9 percent Saturday.

But the won closed at 990.0 against the U.S. dollar Monday, weaker than Friday's close of 979.90. The South Korean currency has lost 14 percent of its value against the dollar so far this year.

Market analysts say the continued fall in the won against the dollar was a sign of waning confidence among overseas investors.

"Foreign investors are selling stocks, converting their money into dollars and getting out," said Brian Hunsaker, an analyst at Kleinwort Benson Ltd.

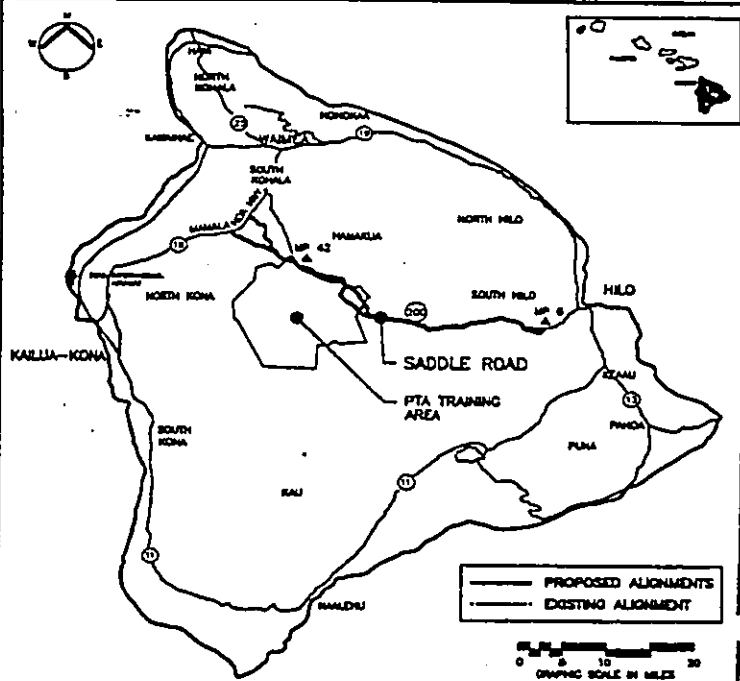
South Korea's economic troubles began last year when its trade deficit increased sharply, the value of its currency began slipping and the nation was hit by the first in what became a series of major corporate bankruptcies.

But even as the trade deficit narrowed sharply on the strength of robust exports, shock waves from Southeast Asian stock markets reached the country and the confidence of foreign investors wavered.

With many of its major banks saddled with billions of dollars of bad loans to failed conglomerates, their credit ratings — and those of the government — were downgraded by international rating agencies.

The government won't reveal how much of its estimated \$30 billion in foreign currency reserves it has spent in defending the won and propping up banks.

But it called reports that it had spent up to \$20 billion and likely would have to seek IMF help "distorted...biased...and exaggerated" and said they had "indirectly exacerbated the turmoil plaguing the stock and money markets."



## PROPOSED SADDLE ROAD PROJECT

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| Pearl City Regional Library<br>1128 Wilcox Home Road<br>Pearl City, Hawaii          | Hilo Public Library<br>300 Wilcox Avenue<br>Hilo, Hawaii   | Hawaii County Department of Public Works<br>25 August Street, Room 302<br>Hilo, Hawaii  |
| University of Hawaii at Manoa<br>Huntley Library<br>2250 The Mall<br>Manoa, Hawaii  | Peleliu Training Area Area Headquarters<br>U.S. Army Garrison-Hawaii, Bldg. T-180<br>Maunaloa Rd, H200 (Saddle Road)<br>Hilo, Hawaii               | Thomas Parker Memorial Library<br>67-1208 Harnishan Highway<br>Kamuela, Hawaii  |
| Kaunohiwi Public Library<br>75-140 Hualalai Road<br>Kaunohiwi, Hawaii               | Hawaii State Library<br>475 South King Street<br>Honolulu, Hawaii  | Directorate of Public Works<br>Wheeler Army Airfield<br>U.S. Army Garrison-Hawaii, Building 300<br>Schofield Barracks, Hawaii                       |
| Kaunohiwi Regional Library<br>45-228 Kamehameha Hwy.<br>Kaunohiwi, Hawaii           | Kaunohiwi Regional Library<br>50 School Street<br>Kaunohiwi, Hawaii  | Hawaii Department of Transportation<br>Hawaii District<br>50 Melekeke Street<br>Hilo, Hawaii  |
| Legislative Reference Bureau<br>State Capitol, Room 604<br>Honolulu, Hawaii         | Highway Department of Transportation<br>Highways Division, Planning Branch<br>800 Kapiolani Boulevard, Room 304<br>Honolulu, Hawaii                | State of Hawaii<br>Office of Environmental Quality Control<br>220 South King Street, 4th Floor<br>Honolulu, Hawaii                                  |
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- |   |  |
|---|--|
| KAZU HAYASHIDA<br>Director of Transportation<br>Hawaii Department of Transportation | LARRY SMITH<br>Division Engineer<br>Federal Highway Administration |
|---|--|

**STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
WILL HOLD  
PUBLIC INFORMATION MEETINGS**

**DATE:** November 18, 1997 (Tuesday)  
**PLACE:** Airports Division Conference Room  
Hilo International Airport  
Hilo, Hawaii  
**TIME:** 5:00 PM

**DATE:** November 19, 1997 (Wednesday)  
**PLACE:** Airports Division Conference Room  
Kona International Airport at Keahole  
Kailua-Kona, Hawaii  
**TIME:** 7:00 PM

The intent of these meetings is to present the transportation programs and projects to be included in the STATEWIDE TRANSPORTATION IMPROVEMENT PROGRAM (STIP) FISCAL YEARS 1998, 1999, and 2000 and solicit public input on them.

Copies of the Statewide Transportation Improvement Program FY 1998-2000 are available for review at the Statewide Transportation Planning Office, 600 Kapiolani Boulevard, Suite 306, Honolulu, Hawaii; or the Highways Division, District Engineer's Office on the respective Neighbor Islands, between 8:00 AM and 4:30 PM, Monday through Friday except State holidays.

Citizens, affected public agencies, private providers of transportation, and all other interested parties are encouraged to attend these meetings. Oral comments may be presented at these public information meeting data, by mail or by FAX to:

Statewide Transportation Planning Office  
600 Kapiolani Boulevard, Suite 306  
Honolulu, Hawaii 96813  
Fax: (808) 587-2382

Special accommodations are available upon request five (5) days prior to the meeting date, to the Department of Transportation, Statewide Transportation Planning Office, telephone (808) 587-1845.

KAZU HAYASHIDA  
Director of Transportation



RECEIVED AS FOLLOWS

14A West Hawaii Today, Wednesday, December 1, 1997

# Israel may annex West Bank if statehood declared

By SAMAR ASSAD

Associated Press Writer

**RAMALLAH, West Bank** — Dismissing Israel's warnings that it would annex parts of the West Bank if the Palestinians unilaterally declare statehood, Yasser Arafat said Tuesday that a Palestinian state was a foregone conclusion.

Keeping open the annexation option is reportedly a key reason for Prime Minister Benjamin Netanyahu's reluctance to hand over more of the West Bank to the Palestinians now.

"The less land the Palestinians control in the early stages, the easier it will be for us to annex in the future," the Yedioth Ahronot daily quoted Netanyahu as telling lawmakers from the right-wing Likud Party.

Netanyahu said Tuesday he would use annexation only as a last resort and that a negotiated peace settlement was Israel's preference. "Obviously, if the other side acts unilaterally, they will encounter unilateral actions on our part. I hope it doesn't come to that," Netanyahu said.

Arafat has said that at the end of the five-year autonomy period, in May 1999, the Palestinians would declare statehood, regardless of whether there was a peace settlement.

Asked Tuesday about Israel's threats of annexation, Arafat said again that the Palestinian dream of statehood would be realized. "Let me make it clear — the Palestinian state is coming, with (the part of) Jerusalem occupied in 1967 as its capital."

In Washington, the State Department advised Israel and the Palestinian Authority on Tuesday to stop talking about unilateral takeovers on the West Bank and deal with the territory's future at the negotiating table.

Statehood and borders should be decided by the two sides in negotiations and "no one should be preempting any of those issues," spokesman James P. Rubin said.

Albright will meet in Paris on Friday with Netanyahu and in Geneva, Switzerland, on Saturday with Arafat, the State Department said.

The prime minister was likely to meet French President Jacques Chirac in Paris and German Chancellor Helmut Kohl in Germany, and would announce final arrangements for the unscheduled trip today, aides to Netanyahu said.

He also spoke to British Prime Minister Tony Blair and asked for "positive European support for the Mideast peace process," they added.

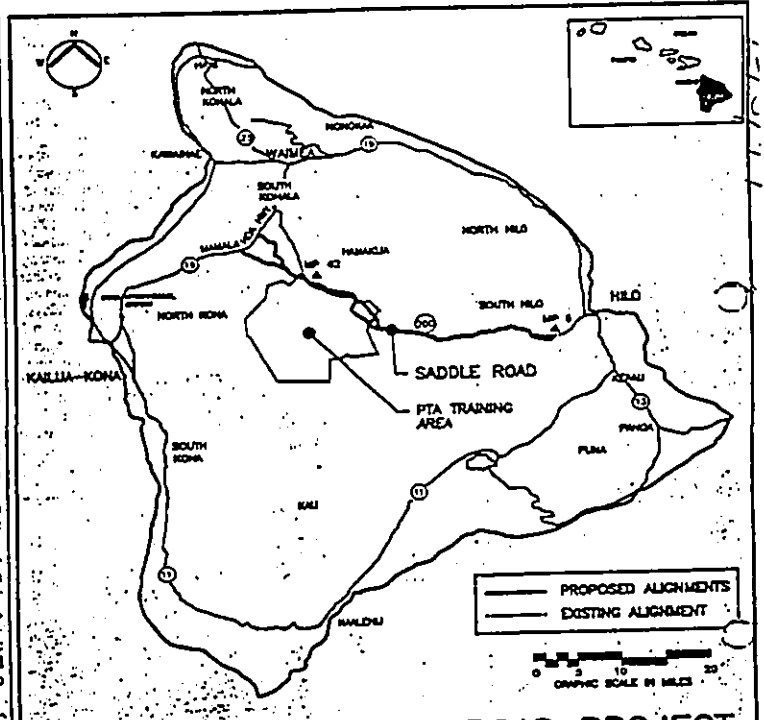
Netanyahu has come under pressure from the three Europeans and other world leaders to do more to put the peace process back on track.

The Palestinians currently control, in full or in part, 22 percent of the West Bank. In a U.S.-brokered agreement, Israel promised to pull back more troops in the West Bank in three stages, with a withdrawal to be carried out every six months and to be concluded by mid-1998.

The Palestinians expect to be in control of more than 90 percent of the West Bank by the end of the third stage, a position Israel says is unrealistic.

In March, the Palestinians rejected Israel's offer of 2 percent in stage one as insufficient. On Sunday, Israel's Cabinet decided in principle to carry out stage two, but did not set a date or define its scope. The Cabinet also said the second pullback would only be carried out if the Palestinians cracked down on Islamic militants and handed over those wanted for killing Israelis.

The Cabinet said it would skip stage three altogether and move straight into negotiations on a permanent peace agreement, including talks on final borders, the status of Jerusalem and the future of Jewish settlements. Under timetables agreed to earlier, such talks are to be concluded by May 1999.



## PROPOSED SADDLE ROAD PROJECT

### NOTICE OF PUBLIC HEARING AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Hawaii Department of Transportation (HDOT), Highways Division, and the Federal Highway Administration, Central Federal Lands Division (FHWA) announce the availability of the Draft Environmental Impact Statement (DEIS) for proposed improvements to Saddle Road (SR 200) between the Maunaloa Highway (SR 190) and Milepost 8 near Hilo, Hawaii, in the County of Hawaii. Two Alternative Alternatives are also considered. The Action Alternatives incorporate use of the existing alignment and potential new alignments. The No-Action Alternative is also considered. The Action Alternatives propose to reconstruct the existing two-lane roadway to a two-lane roadway with steep grades, sharp curves, poor pavement, no speed of 30 to 40 miles per hour. The existing road is a narrow, unimproved two-lane road with steep grades, sharp curves, poor pavement, no speed of 30 to 40 miles per hour. The proposed project will improve pavement condition, increase road safety, improve the quality and capacity of traffic flow, and decrease cross-land travel times. Some Action Alternatives will realign the road within the PTA boundaries between the military and public uses.

Notes in hereby given that the DEIS has been distributed as required by the National Environmental Policy Act of 1969 and Chapter 342, Hawaii Revised Statutes. The DEIS describes and assesses the environmental and social impacts that could result from the completion of the proposed improvements. Subjective issues include protected species of fish and fauna, Critical Habitat for the Endangered Palila, wetlands and biological habitats of importance, archaeological resources, fire hazards, residential displacement, and traffic noise. The formal public and agency review period for the DEIS has begun.

To ensure that all significant issues are identified and the full range of issues related to this proposed project are addressed, comments and suggestions are invited from all interested parties. If you wish to comment, please send or deliver any comments you may have to any one (1) of the three (3) following addresses:

- Mr. Abraham Y. Wang, Division Administrator  
Federal Highway Administration  
Box 80204, 300 Ala Moana Boulevard  
Honolulu, HI 96820
- Mr. Kazu Hayashida  
State of Hawaii, Department of Transportation  
888 Punchbowl Street  
Honolulu, HI 96813
- Mr. Larry C. Smith, Division Engineer  
Federal Highway Administration (FWD-16)  
663 Zang Street, Room 250  
Lahaina, Hawaii 96761

All written comments should be legible, include your name (individual and/or organization) and return address, and must be submitted by December 22, 1997 to be considered.

Maps, drawings, technical studies, and pertinent information received as a result of coordination with other governmental agencies are available for public inspection and copying at the following locations:

- Federal Highway Administration  
Hawaii Division Office  
Prince Kuhio Federal Building  
300 Ala Moana Boulevard, Room 204  
Honolulu, Hawaii 96820
- Central Federal Lands Division  
Project Development Office  
533 Zang Street, 3rd Floor  
Lahaina, Hawaii 96761

- In addition, copies of the DEIS and Technical Appendices are available for public inspection at the following locations:
- Kailua Regional Library  
1041 Kona Road  
Kailua, Hawaii
  - Prince City Regional Library  
1128 Waiwae Home Road  
Prince City, Hawaii
  - University of Hawaii at Manoa  
Hamilton Library  
2250 The Mall  
Honolulu, Hawaii
  - Kaunakakai Public Library  
75-140 Hamakua Road  
Kaunakakai, Hawaii
  - Kaunakakai Regional Library  
48-829 Kaunakakai Hwy.  
Kaunakakai, Hawaii
  - Legislative Reference Bureau  
State Capitol, Room 504  
Honolulu, Hawaii
  - University of Hawaii  
Hilo Campus Library  
200 W. Kawili Street  
Hilo, Hawaii
  - University of Hawaii at Manoa  
Ehlers Library  
2425 Campus Road  
Honolulu, Hawaii
  - Hilo Public Library  
300 Watermark Avenue  
Hilo, Hawaii
  - Paradise Training Area Area Headquarters  
U.S. Army Garrison-Hawaii, Bldg. T-180  
124-Peak Dr., H200 (Saddle Road)  
Hilo, Hawaii
  - Hawaii State Library  
475 South King Street  
Honolulu, Hawaii
  - Kaunakakai Regional Library  
80 School Street  
Kaunakakai, Hawaii
  - Highway Department of Transportation  
Highways Division, Planning Branch  
600 Kapuni Boulevard, Room 304  
Honolulu, Hawaii
  - Federal Highway Administration  
Hawaii Division Office  
Prince Kuhio Federal Building  
300 Ala Moana Boulevard, Room 2204  
Honolulu, Hawaii
  - University of Hawaii at Manoa  
Central Federal Lands Division  
Project Development Office  
533 Zang Street, 3rd Floor  
Lahaina, Hawaii
  - Hawaii County Department of Public Works  
25 Aupuni Street, Room 202  
Hilo, Hawaii
  - Thomas Parker Memorial Library  
67-1209 Maunaloa Highway  
Kamuela, Hawaii
  - Directorate of Public Works  
Whisper Army Airfield  
U.S. Army Garrison-Hawaii, Building 300  
Schouler Barracks, Hawaii
  - Hawaii Department of Transportation  
Hawaii District  
50 Mahealani Street  
Hilo, Hawaii
  - State of Hawaii  
Office of Environmental Quality Control  
220 South King Street, 4th Floor  
Honolulu, Hawaii

Notice is also hereby given that the HDOT, Highways Division, and the FHWA, Central Federal Lands Division will also hold Public Hearings on the proposed Saddle Road project on December 11, 1997 at 2:00 p.m. in the King's Ballroom at the Royal Waikoloa Hotel, 88-375 Waialeale Beach Drive, Waikoloa, Hawaii, and on December 13, 1997 at 2:00 p.m. in the Waiwae Hall, Room 1 at the University of Hawaii-Hilo, 200 West Kawili Street, Hilo, Hawaii. The purpose of these Public Hearings is to present the proposed project, answer questions, and solicit written comments or oral testimony from those who have an interest in the project. Oral testimony will be transcribed verbatim and will receive the same evaluation as written comments. The public is invited to attend. Persons unable to attend or desiring not to present oral testimony at the Public Hearing may file signed statements presenting their views on any aspect of the proposed project. To be considered, such statements and/or written comments must be submitted, received by mail, or otherwise delivered to any one (1) of the three (3) addresses listed above for comments by December 22, 1997.

KAZU HAYASHIDA  
Division Engineer  
Hawaii Department of Transportation

LARRY SMITH  
Division Engineer  
Federal Highway Administration

This Christmas give her skirts, dresses, blouses, shirts, jackets, slacks, curtains, monogrammed towels, sweaters, drapes, sleeping bags, stuffed animals, comforters, shoe bags, backpacks, shorts, swimsuits...

SALE PRICES STARTING AT \$289

This Christmas give her a Husqvarna Viking.

VIKING ELNA WHITE SEWING CENTER  
329-6862

Husqvarna VIKING  
KAIWI SQUARE • 74-5688 LUTELA STREET



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Central Federal Lands  
Highway Division

555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

DEC 29 1997

In Reply Refer To:  
HPD-16E / Saddle Road

**INTERESTED AGENCIES, ORGANIZATIONS, AND CITIZENS**

**Subject: Draft Environmental Impact Statement (DEIS) for Proposed Improvements to Saddle Road from the Mamalahoa Highway (SR 190) to Milepost 6 near Hilo, Hawaii**

Thank you for your letter commenting on the proposed improvements to Saddle Road, SR 200.

The Federal Highway Administration's response to your comments will be provided in the Final EIS (FEIS). Your letter will also be included in the response section of the FEIS.

Your name and address has been added to our mailing list for this project. Upon completion of the FEIS and approval by the Federal Highway Administration, you will be notified of the availability of this document.

Thank you for your interest in this proposed project.

Sincerely yours,

**Robert N. Munsell**

*for* James W. Keeley, P.E.  
Project Development Engineer

bc: B. McCauley  
R. Cushing *BMC*

yc: reading file

Central file - HI Saddle Road project

BMcCauley:jm:12/29/97:L\env\wp\hi006\response.ltr

BENJAMIN J. CAYETANO  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

KAZU HAYASHIDA  
DIRECTOR

DEPUTY DIRECTORS  
BRIAN K. MINAAI  
GLENN M. OKIMOTO

IN REPLY REFER TO:

HWY-PA  
2.6936

NOV - 4 1997

TO: GARY GILL, DIRECTOR  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

FROM: KAZU HAYASHIDA *Kazu Hayashida*  
DIRECTOR OF TRANSPORTATION

SUBJECT: SADDLE ROAD, MAMALAHOA HIGHWAY TO MILEPOST 6  
ISLAND OF HAWAII, PROJECT NO. A-AD-6(1)

The State of Hawaii Department of Transportation, Highways Division, is pleased to submit the following documents pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200, Administrative Rules:

1. Five copies of the draft Environmental Impact Statement (EIS) for Saddle Road, Mamalahoa Highway to Milepost 6 (under separate cover);
2. Distribution list for the draft EIS (also under separate cover); and
3. Revised OEQC Environmental Notice Publication Form.

Our co-sponsors of this project, the U. S. Department of Transportation, Federal Highway Administration (FHWA), Central Federal Lands Highway Division, distributed the draft EIS on October 15, 1997 to all parties on the mailing list. Attached is a copy of their transmittal letter.

In addition to sending comments to the FHWA, please include in your Notice that comments may also be sent to:

Mr. Kazu Hayashida  
Director  
Transportation  
State of Hawaii  
869 Punchbowl Street  
Honolulu, Hawaii 96813

Mr. Gary Gill  
Page 2  
NOV - 4 1997

HWY-PA 2.6936

We will insure that copies of all comments received by the FHWA and ourselves will be furnished to your office.

Since a public hearing for this project has already been scheduled in December 1997, it is imperative that the availability of this statement be published in your November 8, 1997 edition of the OEQC Environmental Notice. If you have any questions, please contact Kenneth Au at 587-1843.

Thank you for your assistance.

Enclosures

RECEIVED AS FOLLOWS

**OEQC BULLETIN PUBLICATION FORM**

TITLE OF PROJECT: Saddle Road Improvement

LOCATION: ISLAND Hawaii DISTRICT Hilo

TAX MAP KEY : 3rd District: Various Zones, Sections, Plats & Parcels

PLEASE CHECK THE FOLLOWING CATEGORIES:

Type of Action: AGENCY  APPLICANT

Applicable State or Federal Statute:

Chapter 343, HRS  Chapter 205A, HRS  NEPA (Federal Actions Only)

Type of Document:

Draft Environmental Assessment (Negative Declaration anticipated)  Draft EIS  NEPA NOP  
 Final Environmental Assessment (Negative Declaration)  Final EIS  NEPA Draft EIS  
 Final Environmental Assessment (EIS Preparation Notice)  NEPA FONSI  NEPA Final EIS

Type of Revision (if applicable):

Revised  Supplemental  Addendum  Other (please explain)

Prior to general distribution, please submit to OEQC: 4 copies of the Draft EA, Final EA (Negative Declaration or EIS Preparation Notice), 4 copies of the Draft EIS or Final EIS (For Draft and Final EISs an additional copy is mailed to OEQC.)

PROPOSING AGENCY OR APPLICANT SHOULD SUBMIT COPIES OF THE DOCUMENTS TO THE APPROVING AGENCY OR ACCEPTING AUTHORITY PRIOR TO SUBMITTING COPIES TO OEQC.

APPROVING AGENCY OR ACCEPTING AUTHORITY:

Governor, State of Hawaii  
ADDRESS: c/o Office of Environmental Quality Control  
220 So. King Street, 4th Floor  
Honolulu, Hawaii 96813

CONTACT: \_\_\_\_\_ PHONE: \_\_\_\_\_

PROPOSING AGENCY OR APPLICANT:

Department of Transportation; Highways Division, Planning Branch  
ADDRESS: 600 Kapiolani Boulevard, Room 304  
Honolulu, Hawaii 96813

CONTACT: Kenneth Au PHONE: (808) 587-1843

CONSULTANT: Okahara & Associates  
ADDRESS: 200 Kohola Street  
Hilo, Hawaii 96720

CONTACT: Donald Okahara PHONE: (808) 961-5527

COMMENT PERIOD END DATE: December 22, 1997

## **2.2 Hearing Transcripts**

### **2.2.1 Waikoloa Hearing**

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U.S. DEPARTMENT OF TRANSPORTATION  
 FEDERAL HIGHWAY ADMINISTRATION  
 CENTRAL FEDERAL LANDS HIGHWAY DIVISION  
 COUNTY OF HAWAII, STATE OF HAWAII  
 FHWA Project No. A-AD-6(1)

IN RE: )  
 SADDLE ROAD (State Route 200) )  
 MAHALOHOA HIGHWAY (State Route 190) )  
 to Milepost 6 )  
 ----- )

HEARING FOR PUBLIC COMMENT

Taken at the Royal Waikoloa, 69-275 Waikoloa  
 Beach Drive, Waikoloa, Hawaii commencing at 7:00  
 p.m. on December 11, 1997.

Before: WILLIAM T. BARTON, RPR, CSR NO. 391  
 Court Reporter, State of Hawaii

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APPEARANCES, AMONG THOSE IN ATTENDANCE:

WILLIAM MOORE, MODERATOR, Okahara & Associates  
 David Gedeon, FHWA, Project Manager  
 Bert McCauley, FHWA, Environmental Project Manager  
 Nancy Burns, Okahara & Associates, Project  
 Manager and Lead Engineer  
 Jay Uyeda, Okahara & Associates, Senior  
 Environmental Planner  
 Leslie McGaughey, Ecoplan & Associates, Senior  
 Environmental Planner  
 Reggie David, Rana Productions, Biologist  
 Ron Terry, Geometrician, Environmental Scientist  
 Tom Wolforth, Paul H. Rosendahl, Inc.,  
 Archaeologist  
 Grant Gerris, PhD, Botanist/Wetlands Specialist  
 Kenneth Au, DOT Highways Division,  
 Advance Planning Engineer  
 Michael Lee, DOT, Rights-of-Way Branch  
 Mary Ann Naber, Advisory Council on Historic  
 Preservation, Preservation Specialist  
 David Heaukalani, PTA, Executive Officer







5  
1 Highway Administration can make informed decisions  
2 in advancing the project proposal.  
3 First, from the State of Hawaii,  
4 Bruce McClure, staff engineer, Hawaii Department  
5 of Transportation. From the U.S. Army, Lieutenant  
6 Colonel David Hergenroeder, commander of the  
7 Pohakuloa Training Area. From the county of  
8 Hawaii, Ms. Donna Kiyosaki, chief engineer. And  
9 from the Federal Highway Administration, Glenn  
10 Yasui, transportation engineer.  
11 The purpose of this public hearing  
12 is for us to present to you what planning has  
13 taken place on the proposed project to date and  
14 receive information from you about any  
15 considerations you would like us to make in  
16 further development of the project.  
17 All the information, whether  
18 submitted in writing at this hearing, through the  
19 mail, or expressed verbally in testimony tonight  
20 will be given full and equal consideration in  
21 future project decisions. We are requesting that  
22 you submit all written comments to the addressee  
23 given in your handout not later than December 22,  
24 1997.  
25 I would like to now turn the

6  
1 meeting over to our moderator for the evening, Mr.  
2 Bill Moore of Okahara & Associates, who will  
3 introduce other officials and staff present at the  
4 hearing tonight and explain further the purpose of  
5 the hearing and review the agenda. Again, thank  
6 you all for coming tonight.  
7 Bill?  
8 MR. MOORE: Thank you, Larry. Good  
9 evening, ladies and gentlemen. At this time I  
10 would like to take a moment to introduce a few  
11 people as well as the project team that has been  
12 working on this for the last three years or so.  
13 First of all, I would like to  
14 recognize David Haukalani. David is the executive  
15 officer of the Pohakuloa Training Area.  
16 We also have out Mary Ann Naber of  
17 the Advisory Council on Historic Preservation.  
18 She is in the back of the room. She is a  
19 preservation specialist.  
20 I would also like to recognize  
21 Kenneth Au of the State Department of  
22 Transportation, Highways Planning Branch, in the  
23 back.  
24 And Mike Lee, also with the  
25 Department of Transportation -- everybody is in

1 the back -- from the Rights-of-Way branch.

2 Part of the project team I would  
3 like to recognize or introduce is David Gedeon  
4 from the Federal Highway Administration who is the  
5 overall project manager.

6 Burt McCauley, from the Federal  
7 Highway Administration, who is the environmental  
8 project manager.

9 Nancy Burns from Okahara &  
10 Associates is the project manager and lead  
11 engineer.

12 Jay Uyeda from Okahara & Associates  
13 who is the project engineer.

14 Leslie McGaughey from EcoPlan  
15 Associates is a senior environmental planner  
16 there.

17 Reggie David, Rana Productions, in  
18 the back there is our biologist, endangered  
19 species specialist.

20 Ron Terry from Geometrician is our  
21 environmental scientist.

22 Tom Wolforth from Paul H.

23 Rosendahl, Incorporated is an archeologist.

24 And Grant Gerris, PhD, is our  
25 botanist and wetlands specialist.

1 We are being fairly formal tonight  
2 because this is a formal public hearing. So bear  
3 with me.

4 The purpose of today's public  
5 hearing is to discuss the location and design of  
6 the proposed Saddle Road improvements from the  
7 Mamalahoa Highway in the South Kohala District to  
8 Milepost 6 on the existing road in the south Hilo  
9 District.

10 No final decision has been made to  
11 implement this project. All alternatives  
12 presented here today, including the No Action  
13 Alternative, will be studied further, considering  
14 all public comments received at hearings and by  
15 mail during the comment period which ends December  
16 22, 1997.

17 A final decision will be made in  
18 consultation with the Hawaii Department of  
19 Transportation, the U.S. Army, and the County of  
20 Hawaii after all comments are received.

21 This public hearing is being held  
22 for several reasons. First, this is a means of  
23 informing you of the Federal Highway  
24 Administration's plans that are being developed  
25 through their Federal Lands Highway Division in

1 coordination with the State Department of  
2 Transportation. This planning is being funded by  
3 the Department of Defense with the Military  
4 Traffic Management Command administering the  
5 funds, along with the Federal Lands Highway  
6 Division.

7 The intent of discussions today is  
8 for you to be informed completely so that you are  
9 able to determine on a factual basis how you as a  
10 property owner, motorist, business owner, or other  
11 interested citizen may be affected either  
12 beneficially or adversely by the proposed project.

13 Secondly, this public hearing is  
14 being held so the Federal Highway Administration  
15 and the other Federal, State, and County agencies  
16 with whom they will consult may obtain facts not  
17 previously brought to their attention in  
18 connection with the location and design of the  
19 proposed project.

20 Lastly, this hearing is a  
21 requirement of the National Environmental Policy  
22 Act, better known as NEPA, for any project which  
23 uses federal funds. It is also in accordance with  
24 the State of Hawaii's Environmental Impact  
25 Statement requirements as contained in Chapter 343

1 of the Hawaii Revised Statutes.

2 Notices of today's public hearing  
3 was published in the Hawaii Tribune Herald, West  
4 Hawaii Today, and the Honolulu Star Bulletin on  
5 November 11th and December 3rd.

6 Now, I would like to review the  
7 agenda for the hearing with you.

8 First, we will present a video  
9 which will describe some of the problems with the  
10 existing road that was been identified and explain  
11 the project's purpose and need as well as various  
12 alignments under consideration.

13 Secondly, we will have Leslie  
14 McGaughey from a consulting firm, Ecoplan  
15 Associates, present an overview of the impacts  
16 that are associated with the various alternative  
17 routes and the mitigation that is being proposed  
18 to offset those impacts.

19 The video presentation should take  
20 approximately 30 minutes.

21 Third, we will then recess for  
22 about forty minutes to give you an opportunity to  
23 visit the exhibit stations for more detailed  
24 information or ask questions that you may have  
25 after the presentations. The exhibit stations

1 include a project overview, or general information  
2 of the project is available. That general station  
3 is on the right side of this table back here.

4 In addition, we have more detailed  
5 information on engineering and right-of-way in the  
6 far back of the room; biological resources on the  
7 left side there; cultural resources, again, in the  
8 back side on my left, your right; and economic  
9 issues, social and economic issues which is  
10 between biology and the cultural resources.

11 Please note that any time during  
12 the recess you may present verbal statements to  
13 our recorder who is sitting here, Mr. Bill Barton,  
14 for inclusion in the official transcript of the  
15 hearing. During the recess you may also fill out  
16 a question card at the exhibit station or return  
17 to the registration table to indicate by your name  
18 that you wish to testify. There are many  
19 opportunities to provide input.

20 After that we will then reconvene  
21 and receive your testimony or statements.

22 Fifth, immediately following your  
23 testimony, we will have a question and answer  
24 session.

25 Following the question and answer

1 session the project key members will again man the  
2 exhibit stations to follow up with any questions  
3 you may have or to provide you with any further  
4 information.

5 I would like to cover some of the  
6 important guidelines for the conduct of this  
7 public hearing.

8 First, the purpose of this hearing  
9 is to solicit information on the project and to  
10 hear your concerns. The hearing is not a debate  
11 on the proposed improvements, nor is this hearing  
12 intended to be a popular referendum either for or  
13 against the Saddle Road project. Further decision  
14 on the project will be made based on the full  
15 record, including the input from this public  
16 hearing, as well as the public hearing on  
17 Saturday, the Draft Environmental Impact  
18 Statement, and written comments received by  
19 December 22, 1997.

20 We do want to extend to you every  
21 opportunity to voice your concerns and to present  
22 any new facts that the Federal Highways  
23 Administration and other consulting agencies may  
24 not be aware of or had not fully considered.

25 Secondly, we want to emphasize the

1 importance of your testimonies. All proceedings  
 2 of the hearing are being recorded. So it is  
 3 important that all of your statements are clearly  
 4 spoken into the microphone. Before beginning your  
 5 statement, please state clearly your name, place  
 6 of residence, and any affiliation you wish to make  
 7 known. Your testimony should be brief, factual  
 8 and courteous to those present.

9 Please stick to the subject matter  
 10 of today's public hearing, which is the proposed  
 11 Saddle Road project. We ask that you be courteous  
 12 to each other and respect everyone's opinion and  
 13 right to be heard. As moderator, it will be my  
 14 responsibility to keep this hearing on track and  
 15 to make sure everybody who wants to speak has a  
 16 chance.

17 Third, all those wishing to testify  
 18 are asked to complete a hearing testimony form at  
 19 the registration desk. Testimony will be received  
 20 in the order that forms were submitted, and  
 21 speakers will be limited to five minutes so that  
 22 everyone has an opportunity to testify.

23 Fourth, for those wishing to just  
 24 ask questions, you may write your question on a  
 25 question card which is available at the

1 registration desk and the exhibit stations. These  
 2 question cards can be turned into anyone at the  
 3 registration desk or at the exhibit stations  
 4 during the recess. We will respond to these  
 5 questions after the testimony portion of the  
 6 hearing is completed.

7 We want to bring to your attention  
 8 the subject of relocation advisory assistance and  
 9 relocation payments which are authorized by  
 10 Federal and State laws. There are two types of  
 11 relocation services authorized to aid persons,  
 12 businesses, farms, and nonprofit organizations who  
 13 might be required to relocate because of this  
 14 proposed project. One is relocation advisory  
 15 assistance, and the other is relocation payments.

16 Both are fully described in the  
 17 brochure entitled "Relocation Advisory Assistance  
 18 and Relocation Payments." Copies are available at  
 19 the registration desk and at the exhibit station  
 20 labeled "Engineering and Right-of-Way." Questions  
 21 concerning relocation assistance may also be  
 22 answered by submitting them in writing to the  
 23 Hawaii Department of Department of Transportation,  
 24 Rights-of-Way Branch, Property Management Section,  
 25 888 Millilani Street, Room 502, Honolulu, Hawaii

1 96813.

2 The Hawaii Department of  
3 Transportation Rights-of-Way branch can also be  
4 reached by phone at 587-2020. There is a toll  
5 free number 1-800-468-4644, extension 72020. This  
6 information will be available at the Engineering  
7 and Right-of-Way station so you don't have to  
8 write it down or try to remember it.

9 Some of you may be here to learn  
10 more about the project and may not be ready to  
11 submit statements today. The Federal Highway  
12 Administration and the Hawaii Department of  
13 Transportation will continue to accept written  
14 statements through December 22, 1997. The  
15 addresses for submitting written statements are  
16 given on the project bulletin and on the comment  
17 sheets available at the registration desk. The  
18 addresses are also given in the Draft EIS and  
19 public notices that appear in the paper.

20 Following the public hearing, staff  
21 of the Federal Highways Administration in  
22 consultation with the Hawaii Department of  
23 Transportation, the County of Hawaii, and the U.S.  
24 Army will evaluate the statements and information  
25 presented today together with the factual data

1 they have already received. Further decisions  
2 concerning the location, design, and environmental  
3 mitigation for this project will be made taking  
4 into account all factual data received through the  
5 public hearings and written comment period.

6 Further, project decisions will be  
7 presented in the Final Environmental Impact  
8 Statement which is scheduled for release in the  
9 spring of 1998. If you wish to be notified of  
10 further development of this project, please be  
11 sure to place your name and address on the  
12 registration sheet at the registration desk before  
13 you leave today. These sheets will be used for  
14 a mailing list for notifying you of further  
15 project development.

16 I would like to also mention that  
17 all information developed, including statements  
18 received during public hearings and written  
19 comments during the written comment period, will  
20 be available upon request for public inspection  
21 within two to three weeks of the conclusion of the  
22 comment period of December 22, 1997.

23 This information will be available at  
24 the Federal Highways Administration and the Hawaii  
25 Department of Transportation locations given in

1 the project bulletin.

2 At this time, I would like to begin  
3 the video presentation.

4 (Whereupon, a videotape was presented  
5 for approximately 13 minutes.)

6 MR. MOORE: This concludes the  
7 video portion of the hearing. At this time, I  
8 would like to introduce Ms. Leslie McGaughey who  
9 will present a summary of the key social,  
10 economic, and environmental impacts of the  
11 proposed project that have been identified at this  
12 time and a summary of the mitigation measures  
13 being proposed to offset those impacts.

14 Leslie?

15 MS. MCGAUGHEY: Thank you, Bill.

16 Good evening.

17 As covered in the video, the  
18 proposed improvements to Saddle Road would address  
19 five general types of needs for existing roadway  
20 deficiencies.

21 One, roadway geometric and pavement  
22 deficiencies.

23 Two, conflicts and hazards

24 associated with combined public and military use  
25 of Saddle Road.

1 Three, traffic capacity  
2 deficiencies.

3 Four, motorist safety problems.

4 And, five, social demand and  
5 economic development.

6 To address the potential  
7 environmental consequence of improving Saddle Road  
8 an Environmental Impact Statement or EIS process  
9 was undertaken. A team of engineers, scientists,  
10 and planners was assembled to identify and  
11 evaluate environmental resources within the  
12 project area.

13 Literature searches, interviews,  
14 and field surveys were conducted for biological,  
15 socioeconomic, and other resources potentially  
16 affected by the project.

17 For cases where environmental  
18 impacts could not be avoided, mitigation measures  
19 were developed to offset those impacts.

20 Key impacts and mitigation measures  
21 are summarized as follows. Please note that this  
22 is not a complete list of impacts and mitigation  
23 but is intended to be an overview of the more  
24 notable issues. Project representatives will be  
25 available during the recess to answer questions



1 and provide you more detail.

2 For the evaluation of impacts to  
3 biological resources special consideration was  
4 given to listed threatened and endangered species  
5 or those proposed to be listed as threatened or  
6 endangered and any critical habitat designated for  
7 protection of these species pursuant to the  
8 Federal Endangered Species Act.

9 The key impacts on these resources  
10 anticipated with all of the action alternatives  
11 include:

12 One, the potential to disturb  
13 several endangered bird species.

14 Two, an increase in the threat of  
15 unplanned wildfires in fire sensitive areas with  
16 the increase in traffic.

17 Three, the potential to impact  
18 kipuka located along the project area on the east  
19 end.

20 Four, a greater risk of disturbance  
21 of native habitats and species from increased  
22 human access to the Saddle area.

23 Five, an increased potential for  
24 the spread of alien insects and plants along the  
25 project corridor.

1 And, six, the loss of existing  
2 wetland areas within the proposed project area on  
3 the east end.

4 If segments PTA-1 or PTA-3 are  
5 selected for the project, approximately 100 acres  
6 of critical habitat for the endangered Palila will  
7 be modified within the Pohakuloa Training Area.

8 The major components of the  
9 biological mitigation for all action alternatives  
10 are as follows:

11 One, any listed threatened or  
12 endangered plant species or those proposed to be  
13 listed which were identified during the field  
14 surveys will be fenced off from construction  
15 activities at the right-of-way line.

16 Two, all construction activity will  
17 be restricted to the clearly delineated  
18 right-of-way, and construction equipment entry  
19 will be through nonsensitive preselected  
20 locations.

21 Three, all construction equipment  
22 will be steam-cleaned and fumigated before being  
23 transported to the construction site to ensure  
24 that no weeds or alien insects are transported  
25 there.

Four, all efforts will be made to design the segments to balance earthwork quantities so that minimal outside fill sources which could introduce alien species will be required for the project.

Five, all efforts will be made to design the segments to avoid disturbance to kipuka.

Six, contractors will follow special construction requirements to avoid nighttime impacts to nesting seabirds and other impacts to hawks and upland endangered bird species.

Seven, for portions of segments EX-2, PTA-1, and PTA-3, the proposed roadway typical section will be modified to include an additional 8 foot paved fire break separated from the roadway by a wire fence and curb to discourage vehicle access to the forest.

Eight, a fire ecologist will be retained to develop a fire management model, and a comprehensive fire management plan will be developed.

And, nine, a Clean Water Act section 404 Corps of Engineers Permit will be

obtained to address impacts to wetlands. Additional mitigation commitments are proposed if segments PTA-1 or PTA-3 are selected.

These include, one, a total of 9,345 acres will be set aside as Palila critical habitat mitigation lands in the Pu'u Mali, Kipuka Alala, and Ka'ohe lease areas, with the goal of regenerating mamane forest for the eventual range expansion or translocation of endangered Palila. All critical habitat mitigation lands will be fenced to exclude feral ungulates, such as pigs and sheep. Provisions will be made for hunter access, and predator control and monitoring will be undertaken.

Two, intensive studies of the critical habitat mitigation lands will be undertaken to assist in formulating management plans to be implemented over a ten-year period.

For socioeconomic resources the key impacts or benefits are:

One, improved business opportunities and reduced business and commuting time between Hilo and Kona -- excuse me, Kona/South Kohala by as much as twenty to thirty

1 minutes each way.

2 Two, temporary delays and

3 inconvenience to residents of Upper Kaumana and

4 motorists on Saddle Road during construction.

5 Three, improved access to hunting

6 and other recreational areas, increasing the risk

7 of damage from off-road vehicles.

8 Four, loss of some existing

9 ranching and hunting lands.

10 Five, an improvement in traffic

11 flow and access to the Saddle area.

12 Six, loss of mamane forest and

13 potential to impact kipuka, each with potential

14 value to Native Hawaiians.

15 Seven, an increase in employment

16 from construction activities.

17 And, eight, improved safety for

18 motorists, bicyclists, and pedestrians by

19 improving road geometrics.

20 In addition, the following impacts

21 are anticipated with the construction of specific

22 segments.

23 With selection of W-2:

24 An increase in traffic volumes on

25 Waikoloa Road.

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1 With selection of PTA-1 or PTA-3:

2 One, a gain of nearly 5,000 acres

3 of bird hunting land at Pu'u Mali.

4 Two, increased safety by minimizing

5 conflicts between the traveling public and

6 military training activities in the Pohakuloa

7 Training Area.

8 And, three, improved quality of

9 military training activities with the realignment

10 of Saddle Road to the northern boundary of the

11 Pohakuloa Training Area.

12 With selection of EX-4A:

13 One, an increase in traffic volumes

14 and associated noise levels in Upper Kaumana.

15 And, two, potential need to

16 relocate some residences along the existing Saddle

17 Road.

18 The major components of

19 socioeconomic mitigation for all action

20 alternatives are as follows:

21 One, construction provisions will

22 be made to avoid impacting activities that

23 generate significant cross-island traffic, such as

24 the Waikuli Music Festival and the Saddle Road

25 Highway Relay. Access to existing driveways and

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1 roads will be maintained throughout construction,  
 2 And two, hunters will be actively  
 3 consulted in management of critical habitat  
 4 replacement lands, particularly for activities  
 5 related to feral animals. Special management of  
 6 the Ka'ohe Lease Lands will be undertaken to  
 7 promote game bird habitat.

8 Other key environmental impacts  
 9 anticipated with the implementation of Saddle Road  
 10 improvements include:

11 One, a temporary effect on surface  
 12 water quality, particularly an increase in  
 13 suspended sediments during and shortly after  
 14 rainfall events during construction.

15 Two, a temporary and localized  
 16 increase in particulates and dust during  
 17 construction. However, air quality standards will  
 18 not be exceeded.

19 Three, potential impact to historic  
 20 archeological sites such as temporary cave  
 21 shelters, lava walls for livestock containment,  
 22 wagon roads, and built-up livestock trails.

23 Four, potential negative impact on  
 24 visual quality and visual character of the Saddle  
 25 area.

1 And, five, potential impacts to  
 2 caves and lava tubes.

3 Other mitigation measures proposed  
 4 to minimize project impacts include the following:

5 One, erosion control measures will  
 6 be implemented, and construction areas will be  
 7 watered for dust control during the construction.

8 Two, the selected road alignment  
 9 will be modified in the area of historic

10 archeological sites to avoid or minimize impact to  
 11 these features. Documentation and data recovery  
 12 will be completed on some relatively small

13 segments that would be impacted. Some sites will  
 14 be monitored during construction to ensure that  
 15 impacts are restricted to an absolute minimum.

16 Traffic pullout and interpretive signing will be  
 17 developed for some sites.

18 Three, roadside treatments will  
 19 incorporate erosion control measures and

20 excavation techniques to create a more natural  
 21 appearance following construction. Scenic  
 22 pullouts will be provided in several locations.

23 Four, proper cultural protocol will  
 24 be undertaken by a native Hawaiian who follows the  
 25 way of the Old Culture to release and sanctify the

1 construction project.

2 Five, construction workers will  
3 complete environmental awareness training.

4 And, six, a field review will be  
5 conducted prior to construction to determine the  
6 probability of caves and lava tubes within the  
7 construction corridor. Construction techniques  
8 will be developed to avoid or minimize these  
9 impacts.

10 The potential impacts and benefits  
11 of the No Action Alternative which would keep  
12 Saddle Road as it is today were also considered as  
13 part of the environmental impact statement  
14 process.

15 The No Action Alternative would not  
16 enhance safety, would not eliminate roadway  
17 deficiencies, nor improve level of service, would  
18 not improve operational function, would not  
19 accommodate future traffic levels, would not  
20 reduce or eliminate conflicts between motorists  
21 and military operations, and would not require the  
22 expenditure of about \$200 million. It would not  
23 result in new impacts to the environment as  
24 anticipated with the action alternatives, nor  
25 would it enhance the socioeconomic relationship

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1 between East and West Hawaii.

2 This concludes our brief overview  
3 of the more notable impacts and mitigation  
4 commitments associated with the Saddle Road  
5 improvement project. Please feel free to ask  
6 project representatives at the exhibit stations  
7 during the recess for more detailed information or  
8 to answer any questions you may now have. Mahalo.

9 MR. MOORE: Thank you, Leslie. We  
10 will now recess for about forty minutes to give  
11 you an opportunity to review the more detailed  
12 information presented at the exhibit stations and  
13 to ask questions of the project representatives at  
14 the stations. Refreshments are also available on  
15 the side here. Water is outside.

16 I would like to remind you that at  
17 any time during the recess you may present a  
18 verbal statement to the recorder sitting across  
19 the way for inclusion in the official transcript  
20 of the hearing or you may wait for the testimony  
21 portion of today's public hearing. In either  
22 case, your statement will be part of the official  
23 record of this hearing.

24 During the recess you may also fill  
25 out a question card at the exhibit stations or

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1 return to the registration table indicating by  
2 your name that you wish to testify.

3 Again, we will reconvene -- it's  
4 7:50. We will reconvene at 8:30.

5 (Whereupon, a recess was taken.)

6 (Whereupon, oral testimony was delivered  
7 to the Recorder follows.)

8 ANN PETERSON: Anne Peterson, P.O.

9 Box 62, Kailua-Kona, Hawaii 96745. I represent  
10 the organization PATH, which stands for People's  
11 Advocacy for Trails Hawaii. And as the island is  
12 becoming a sports destination and Saddle Road  
13 presents an excellent high altitude training area,  
14 can the shoulders be paved to the same standard as  
15 the car lanes and can an inverted rumble strip be  
16 added between the car lane and the shoulder as has  
17 been done on Queen Kaahumanu Highway north from  
18 Keahole Airport?

19 ANNE FIELD-GOMES: My name is Anne  
20 Field-Gomes, P.O. Box 6968, Kamuela 96743. My  
21 husband and I wish to appear in favor of the  
22 western terminal W-2 route connecting with  
23 Waikoloa Road. And at the community association  
24 meeting last week there was overwhelming consensus  
25 that that was the road the people there favored,

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1 about thirty-five or forty people.

2 TODD LUM: Todd Lum. My address is  
3 P.O. Box 930, Kamuela 96743.

4 Basically, all I'm commenting on is  
5 the newspaper article that came out and the  
6 presentation that was made just before this and  
7 that PTA-1 or 3 has little or no significance to  
8 Palila, and the area should never have been  
9 designated critical habitat from the beginning.  
10 There haven't been any birds sighted in there.  
11 It's basically a land grab when they needed to  
12 designate critical habitat for Palila.  
13 So the way I see it is that the Federal highways  
14 people, I guess, are being held hostage for this  
15 project.

16 It's tantamount to extortion in  
17 terms of Palila adding the cost to this whole  
18 project and securing other lands when the lands  
19 that are being lost to the PTA-1 or 3 are not that  
20 critical to Palila in the beginning. Whether they  
21 choose PTA-1 or 3, the fire threat will be there,  
22 the insect problems will be there even if they  
23 choose to do no action.

24 Mowing in the Ka'oho lease area,  
25 that's a joke. That will never replace what

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1 cattle can do for game birds. Tractors and mowers  
 2 do not put out cow pies which produce dung beetles  
 3 which are a favorite of game birds, insects. So  
 4 you are not going to get cow pies out of a mower.  
 5 And you are not going to get insects. So that's  
 6 really a bandaaid treatment just to keep the grass  
 7 down. It's not just the grass we are trying to  
 8 keep down. We are also trying to -- in terms of  
 9 improving thing for game birds, you need the  
 10 insects.

11 Pu'u Mali, as far as access for  
 12 hunters, I see that as a short-term benefit to  
 13 hunting until it becomes enclosed by mamane trees.  
 14 Although they say it will be good for hunters, it  
 15 is just a short-term benefit.

16 The steam cleaning of construction  
 17 vehicles. That's another joke. It's a waste of  
 18 money. As it is now, people go up there on a  
 19 daily, basis whether they are bird watching, they  
 20 are hiking, camping, or hunting. Nobody is doing  
 21 that now. And the military is certainly not doing  
 22 that to their vehicles. The introduction of  
 23 weeds, alien species is happening with or without  
 24 construction. So I think that's kind of a -- that  
 25 proposed action was just thrown out there for

1 environmental concerns. But in all practicality  
 2 it probably doesn't do a whole lot considering  
 3 what's happening today.

4 I have some comments that somebody  
 5 else has asked me to submit. In the newspaper  
 6 article published in Sunday's paper there was  
 7 notes made that mamane was sacred. And nowhere  
 8 can this be found in the literature. It's nowhere  
 9 in print. There's no documentation that it was  
 10 ever used for special ceremonies or that there is  
 11 anything sacred about mamane, Palila, or kipukas.

12 So, basically, from the State park  
 13 to Ahumoa is basically scrub and is not mamane  
 14 forest.

15 And from the park to Omaokoili is  
 16 mixed forest or just woods that is not mamane  
 17 forest either.

18 The question posed to me was why  
 19 give up 10,000 acres for just 100 acres of  
 20 questionable land when the present habitat is not  
 21 working for Palila?

22 That's basically all I've got from that  
 23 other person.

24 KAIPOLEIMANU KAMALANI: I am  
 25 Kaipoleimanu Kamalani. I live in Waimea. I have

1 a residence in Hawaiian Homes. 64-1028

2 Kauikeaouli.

3 And my question is I understand it  
4 will exist. But I wanted to know if the existing  
5 exit and entry into Saddle Road as it lies today,  
6 if it will remain so and not change. My reason  
7 for this is I don't want to travel 6 extra miles  
8 to get onto the Saddle Road from Waimea. That's  
9 my only question.

10 And I was informed tonight that  
11 there are no plans to close that existing exit and  
12 entry, and I am satisfied. If I'm not, I'll come  
13 back and scream again.

14 At one time they eradicated --  
15 they killed the sheep and goats on Mauna Kea. And  
16 then when they killed them, they left them to rot.  
17 I wanted to know if there is anything I can say so  
18 that they don't do it again. But I understand  
19 there's a possibility that they would have hunters  
20 that will go in and clear the area of unwanted  
21 animals. But I want to make sure that they don't  
22 do that again, by killing them for naught.

23 (Whereupon, the public hearing

24 reconvened.)

25 MR. MOORE: With your permission,

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1 when I first went over the ground rules, we  
2 indicated that the speakers would have five  
3 minutes. We have sixteen speakers. What I would  
4 like to do is ask the speakers to be limited to  
5 three minutes. If you cannot complete in that  
6 time, we will allow you to come back up after the  
7 other people have spoken for an additional two  
8 minutes. So everyone will have five minutes. I  
9 would like to have everyone have the opportunity.

10 If that is okay with people and  
11 there's no one screaming, I would like to allow  
12 three minutes initially with an opportunity to  
13 follow up.

14 At this time, I would like to go  
15 over the ground rules again one more time before  
16 taking testimony. Again, speakers will be taken  
17 in the order they signed up at the registration  
18 desk, and only those signing up to testify will be  
19 called. I would like to let you know that you may  
20 sign up at any time during the testimony. Just go  
21 up to the desk, and they will bring it up to me.

22 Speakers will be limited to three  
23 minutes so everyone has the opportunity to  
24 testify. If you cannot complete in that time, we  
25 will allow you to come back for an additional two



1 minutes after everyone else has spoken.

2 Again, please speak clearly into  
3 the microphone. Your testimony, again, will not  
4 be taken from the floor. These proceedings are  
5 being recorded, and a verbatim transcript will be  
6 prepared. Please be nice to Bill there.

7 Again, he needs eye contact with  
8 you. So if he cannot hear or understand you, he  
9 will interrupt you and let you know.

10 Again, please be brief and factual.  
11 Stick to the subject matter. And please be  
12 courteous.

13 Again, remember this is not a  
14 debate or referendum on Saddle Road.

15 At this time I would begin to  
16 take testimony. The first person indicated to  
17 testify is Donald Mederous.

18 DONALD MEDEROUS: Aloha. I am  
19 Donald Mederous. And I represent the Hawaii  
20 Operating Engineers Industries Stabilization Fund.  
21 We are a joint neighbor and management  
22 organization that represents approximately 3,000  
23 union members and 300 employers.

24 We come before you this evening in  
25 support of the Saddle Road project. These

1 improvements are a needed necessity in that it  
2 will allow us to travel safely from Hilo to Kona  
3 and back, especially during stormy weather, which  
4 is about to come, rock slides and everything.

5 It will also improve the flow of  
6 traffic by providing a short cut that will make  
7 the travel from one side of the island to the  
8 other more viable.

9 We the construction industry have  
10 built the airports, water, and sewer lines, the  
11 roads and highways, and all of the rest of the  
12 infrastructure which makes our state one of the  
13 greatest places in the world to live and raise  
14 children.

15 We the workers that have built this  
16 are now without jobs. We too need to work to  
17 provide for our families. We want to work. We do  
18 not want welfare.

19 This project as a whole is good for  
20 the entire island of Hawaii. We want to have safe  
21 roads, and we need jobs. So I ask everyone here  
22 tonight to support the Saddle Road project. Thank  
23 you for your time and attention. Mahalo.

24 MR. MOORE: Thank you, Donald. I  
25 would like to call up Rodney Resentes. Please

1 state your name and address and your affiliation  
2 if you so desire.

3 RODNEY RESENTE: My name is Rodney  
4 Resentes. I'm from Hilo. I am a member from the  
5 Operating Engineers Local Number 3.

6 I feel this project on the Saddle  
7 Road is very vital for the east and -- to link the  
8 east side of Hawaii to the west side of Hawaii.

9 It's very important because of the fact of the  
10 that the Hamakua Coast is getting very unsafe now  
11 with the weather and stuff. In the Pahala there  
12 is always a flood. So I feel the Saddle Road  
13 project is very vital to link the east and west  
14 together. And it's a lot easier access for people  
15 to get from one side of the island to the other.  
16 Thank you very much.

17 MR. MOORE: Thank you. I would  
18 like to call Willy Crozier.

19 WILLY CROZIER: Good evening, Mr.  
20 Moderator and everybody else here.

21 I live in Honolulu. I work for the  
22 Operating Engineers. However, this evening  
23 representatives of our organization have already  
24 spoken. I will speak as an individual on my own  
25 behalf.

1 As I said, I live in Honolulu. Why  
2 should I be here testifying for something that is  
3 happening on the Big Island? Very simple. I  
4 still pay my property taxes here in Hilo on the  
5 Big Island. But most importantly my heart -- my  
6 heart is here on the island of Hawaii.

7 In 1973 I came to this island by  
8 choice, and I wanted to live here because this is  
9 a great place to live. The first job I had was  
10 Kawaihae Harbor, dredging the harbor. I lived  
11 in Kamuela. And as my work took me to Hilo, I  
12 moved to Hilo. Work was good. Eventually work  
13 got bad. There was not enough work for the  
14 construction people. Myself like many others were  
15 unemployed.

16 The County of Hawaii said pay your  
17 property taxes. I did. The State of Hawaii said  
18 pay your taxes. You have to. I did. But now the  
19 bank said pay your mortgage because if you don't  
20 pay mortgage, we'll take your house away. Red  
21 flags go up. Willy's got to go to Honolulu to  
22 work. I have to pay the bank. I'm still paying  
23 the bank for that same house.

24 The point I'm trying to arrive at,  
25 I came to this island by choice and I raised my

1 sons here. Both of my sons want to come back to  
2 this island to live. They can't. There's no  
3 work, you know. This is where they grew up. They  
4 can't even work here.

5 In the eighties, you know, the  
6 plantation went down, construction went down. We  
7 moved to Honolulu. Now in Hawaii we talk about  
8 ohana. Ohana is supposed to be family, your  
9 immediate family your extended family. What is  
10 happening on this island now is something that is  
11 tearing our families apart.

12 Young people if they want to work  
13 have to go to Honolulu. And worse yet, sometimes  
14 they have to go to the mainland. Now, you may  
15 say, good, this is fine, these are adventures,  
16 these are young people going out into the world.  
17 But you have parents on this island who very  
18 seldom get to see their children. This is not  
19 building ohana. This is tearing them apart.

20 We have grandparents on this island  
21 who don't get to see their grandchildren. If they  
22 are in Honolulu, they see them two or three times  
23 a year. Or worse yet, if they go to the mainland  
24 they may see them two or three times before they  
25 die. There's no bonding.

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1 I believe everyone in this room  
2 loves their family and children and their  
3 grandchildren. They want to see them, and they  
4 want to bond. But the economy of this island is  
5 preventing this for many, many families --

6 MR. MOORE: Excuse me, Willy.  
7 Would you please wrap up.

8 WILLY CROZIER: Without the work --  
9 without work the young people have to leave. And  
10 when they leave, they are torn away from their  
11 families. I ask you, I ask the officials here, I  
12 ask the public, please support this project. We  
13 need this project for the economy. We need this  
14 project for work for all of our people. Mahalo.  
15 Good night.

16 MR. MOORE: We appreciate  
17 respecting the time limit. I would like to call  
18 Phil Bruce at this time.

19 PHIL BRUCE: My name is Phil Bruce  
20 and I live in Waikoloa. The reason I came to this  
21 meeting tonight is because I want to get the  
22 people who are going to build this road and are  
23 going to make sure that it's built right and put  
24 in the right place -- I want to call your  
25 attention not necessarily to citizens like me but

1 the people on the payroll on the road plans.

2 I want you to seriously consider  
3 this W-2 route. The reason I'm making that notice  
4 is because if you take W-3, when the traffic comes  
5 to the intersection of highway 190 and W-3, they  
6 are going to turn right and drive up here, and  
7 they are going to take the Waikoloa Road to the  
8 Kaahumanu Highway. Because that's where the work  
9 is.

10 There's no work over in Kona. The  
11 people that live in Hilo, some quite a few of  
12 them, even some people I know that live down in  
13 Kahu are driving this Saddle Road now because  
14 there's work in these hotels. That's the work  
15 that they want. This is the work of the future.

16 Now, when they make this connection  
17 with the Waikoloa Road, they are going to have  
18 problems right there. Waikoloa Road is obsolete  
19 right now with the traffic it's carrying now. If  
20 the State and the Federal government don't make  
21 the necessary plans to do something about this  
22 road along with the Saddle Road, they are going to  
23 have a bottle neck here that won't be able to be  
24 surmounted. And if they wait to develop this road  
25 until after this is completed, they are going to

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1 have another chaos on our hands.

2 I submitted a statement here  
3 requesting that in the community of Waikoloa I  
4 want to have it included in the development of  
5 this project that in Waikoloa if they use this  
6 existing highway, the Waikoloa Road, we have to  
7 have an intersection in Waikoloa on Paniolo and  
8 Waikoloa Road with traffic signals. We don't have  
9 any now.

10 We have a problem now. The county  
11 says, oh, well we can't give you any traffic  
12 signals unless you have some accidents there.  
13 Maybe even it was indicated to me that they would  
14 kind of like to have a couple of fatalities. I've  
15 already picked out the people in my community that  
16 ought to be in those accidents.

17 MR. MOORE: Mr. Bruce, wrap up --  
18 excuse me. Mr. Bruce, please wrap up.

19 PHIL BRUCE: Okay. My time is up.  
20 But I want you to consider traffic signals in  
21 Waikoloa. Thank you very much.

22 MR. MOORE: Thank you very much. I  
23 would like to call Ken Ono at this time. Again, I  
24 would like to remind you to state your name and  
25 address for the record, please.

1 KEN ONO: Good evening. My name is  
2 Ken Ono. And I am a resident of Captain Cook in  
3 South Kona. And I'm here representing the  
4 Kona-Kohala Chamber of commerce, of which I am the  
5 chair. I'm also here as an individual.

6 I'm born and raised in Hilo. And  
7 my parents live in Hilo. They are about two miles  
8 away from Kaahumanu Road, but I don't think  
9 they've really gone on the Saddle Road to visit us  
10 in Kona because they consider it unsafe. So they  
11 will go all the way around just to avoid Saddle  
12 Road. It's kind of sad

13 I am used to the Saddle Road  
14 myself, driving back and forth. And we are, from  
15 a personal point of view, very much in favor of  
16 it. From the Chamber of Commerce point of view,  
17 we will be submitting written testimony in favor  
18 of the project. We are very pleased that we had  
19 not only ample opportunity to provide input, but  
20 when there are issues that we have raised that we  
21 feel that there's been due consideration. So we  
22 are very pleased that we have had the opportunity  
23 to provide the input.

121 I do have one specific

45 recommendation. That is on -- should W-2 be

1 approved, we do have a specific recommendation  
2 that serious consideration be made not so much for  
3 the signalization or traffic lights with Mamalahoa  
4 Highway but somewhere -- like you build a bridge  
5 or something like that. Because if you look at  
6 that intersection, you are looking at like ten or  
7 twenty miles before there's anything else.

8 And we have a lot of visitors, and  
9 most people are not used to driving on a highway.  
10 And after twenty miles of sort of driving on  
11 nothing with no overhead lights or anything like  
12 that, all of a sudden you have a stop sign or a  
13 stop light. And we would consider that to be a  
14 very dangerous situation, and it's only a matter  
15 of time before -- whether it be a resident or a  
16 visitor, that they will get into a traffic  
17 accident.

18 If that route is actually chosen,  
19 we would look at more of an overpass, underpass  
20 kind of arrangement rather than signalization.  
21 With that, thank you very much for the opportunity  
22 to give input.

23 MR. MOORE: Thank you very much. I  
24 would like to call Daniel Morimoto.

25 DANIEL MORIMOTO: I am Daniel

1 Morimoto I live in Waimea. And I am always  
2 amazed at these hearings when all the guys of the  
3 industries get up and say this is great and this  
4 will take care of it and this is going to solve  
5 everything.

6 I wish that were true. I wish if  
7 we stuck in \$200 million to a 58-mile road that  
8 that makes everything okay or everybody's kids and  
9 grandkids and everyone in Hilo and Kona that wants  
10 to can visit. I wish it were that simple.

11 I will speak to what I am probably  
12 sure is a minority opinion. This draft  
13 environmental statement here was well-orchestrated  
14 and very smoothly run. I get the impression that  
15 I'm kind of at a trade show where there are lots  
16 of professionals in the back and we know everybody  
17 and all get along. I wish that were true. I wish  
18 we could be sure that this money is going to pop  
19 up from the DOT and the Feds and the State down  
20 the line. I kind of suspect that things will get  
21 stall and we will have a different scenario in  
22 store.

23 I submit, however, that the  
24 conclusions of the EIS are ill-advised and largely  
25 devoid of sense. I asked a lot of people here to

1 consider waking up to some other realities. The  
2 Saddle Road is a country road through the country.  
3 Why don't we keep it that way?

4 In a time of shrinking revenues and  
5 uncertain funding, it is ludicrous to build a  
6 fifty to sixty-mile per hour highway through a  
7 desolate area that is often fog-shrouded. There  
8 are lots of numbers in the EIS. But what is the  
9 cost of properly maintaining the present road, and  
10 why isn't it being done now?

11 Is putting in a new highway going  
12 to ensure we take care of whatever we do in the  
13 future? We have lots of roads on this island that  
14 don't have this highly touted eight-foot  
15 right-of-way on both sides. And we will put this  
16 highway in up there which now has only an average  
17 use of 900 people a day?

18 It's unconscionable to destroy  
19 kipuka and other fragile habitats for the sake of  
20 speed and the construction industry. Again, I ask  
21 the players in this development drama to please  
22 wake up and avoid the spectacle of another H-3 on  
23 this island.

24 The Draft EIS acknowledged that the  
25 action alternatives will cause a decrease in

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1 visual quality and severe and substantial change  
2 in visual character. The proper choice, I  
3 believe, is no new road. We should take care of  
4 what we have. We need an increase in moral fiber  
5 and a substantial change in awareness. Thank you.

6 MR. MOORE: Thank you. I would  
7 like to call Steve Troute at this time.

8 STEVE TROUT: I am Steve Troute  
9 from Honokaa. I am a daily commuter. I drive  
10 Saddle Road twice a day. And every day I'm  
11 reminded of the fact that the existing  
12 right-of-way, the existing road, is probably the  
13 most dangerous in the state. You see the crosses  
14 by the side of the road and the spots where I've  
15 seen accidents or stopped to help somebody who has  
16 had an accident. And I believe very strongly that  
17 the road needs to be upgraded. There is no  
18 question about it. It's a public safety issue.

19 In addition to that, as a taxpayer,  
20 after reading some of these presentations, I have  
21 some question because it our tax dollars and it's  
22 a lot of millions of dollars involved.

23 There's an issue there of taking  
24 out a hundred acres of mamane forest and we have  
25 to replace it with 10,000. And I don't think that

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1 is fair to the taxpayer. That is an awful lot of  
2 interest to pay. 10,400. So I strongly oppose  
3 that for the taxpayers. Thank you.

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4 MR. MOORE: I would like to call  
5 Darlene Montgomery.

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6 DARLENE MONTGOMERY: I am Darlene  
7 Montgomery. And I am a little bit nervous. I am  
8 here this evening because I'm a frequent traveler  
9 on the Saddle Road. And I'm in favor of the  
10 development and improvement of this road.

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11 When there's an accident on the  
12 road, there's a lot of times that we are unable to  
13 stop to assist because there's no easement or it's  
14 dangerous to stop where the accident has occurred.

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15 And, consequently, we need to call 911 and say,  
16 hey, there's an accident on Saddle Road at  
17 whatever mile point that is. And they have to  
18 come and assist. We just cannot stop.

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19 I just moved here from Oahu. And I  
20 live in Waikoloa. And I was deathly afraid of  
21 riding on Saddle Road. And now I drive it  
22 carefully. And I'm still scared of the road. I  
23 don't go to Kaaau to visit my family because it's  
24 too long a drive for me. And if we do, we do not  
25 take Saddle Road. We go on the Hamakua Coast.

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1 So if there is an improvement on  
2 it, it will be more -- traveled a little bit more  
3 for those of us that are scared of it. Thank you.

4 MR. MOORE: Thank you. At this  
5 time I would like to call Kelly Greenwell.

6 KELLY GREENWELL: My name is Kelly  
7 Greenwell. And I am here representing both myself  
8 and the Kona Outdoor Circle.

9 Speaking for myself, I have nothing  
10 to say because Mr. Morimoto has already said it.  
11 Speaking for the Kona Outdoor Circle, I would like  
12 to say if this road is built that the aesthetic  
13 quality of this road is all important.

14 We are looking for ways to  
15 entertain the visitor that comes here. And it so  
16 happens that this zone across the island is  
17 probably one of the most beautiful experiences for  
18 a driver that we have in the state of Hawaii. You  
19 don't find this kind of environment anywhere else.

20 And I think right now the fact that  
21 the rental car agencies don't want their clients  
22 driving across that road is a real disservice for  
23 the people coming here. So I agree we certainly  
24 have to do something about the quality of the  
25 road.

1 But I think that it's all important  
2 that we understand the aesthetic quality of  
3 crossing it. When I hear we will have fences and  
4 eight-foot wide paved strips as fire prevention,  
5 it concerns me. Because I think those things will  
6 detract from the physical appearance of the road.

7 The other thing I think we all have  
8 to give some thought to is the removal of this  
9 portion (indicating) of the mamane forest. To me  
10 that is an ecological zone that should not be  
11 lost. And I don't think you will transplant that  
12 zone to some other part of the mountain and spend  
13 a whole lot of money because it isn't going to  
14 work.

15 Basically, I think speaking from  
16 the Outdoor Circle, I think if this thing happens,  
17 we want to be very careful that we do not damage  
18 the aesthetics. You can't have a country without  
19 a country road. And the Saddle Road has always  
20 been our country road. Thank you.

21 MR. MOORE: Thank you. I would  
22 like to call Ken Melrose.

23 KEN MELROSE: Thank you. And good  
24 evening I am Ken Melrose. And I represent  
25 Waikoloa Land Company, 150 Waikoloa Beach Drive.



Waikoloa Land Company is the developer of the Waikoloa Village and Waikoloa Beach Resort and the owner of the lands makai of the junction of W-2 with Mamalahoa Highway.

We would like to speak in support of the Saddle Road improvements as a much needed cross-island link to join Hilo and the west side of the island.

Also, since the majority of the military traffic for which the primary initial purpose of this project was, currently uses Waikoloa Road as its transportation route. We would like to support the route selection W-2, believing that it is going to provide the best linkage.

Waikoloa Road is the only mauka-makai connector between Kawaihae Road and the Kona-Kohala Estates. It was built to county standards and was built by our predecessor and dedicated to the county.

In conjunction with selecting that route, we believe that it is also incumbent on this project to study the rest of the route that connects Mamalahoa to Queen Kaahumanu Highway and make the necessary infrastructure improvements to

that section of the road, as well. Thank you.  
MR. MOORE: Thank you. I would like to call Lloyd Case.

LLOYD CASE: Good evening. My name is Lloyd Case. I am the president of the Wildlife Conservation Association of Hawaii. I represent hunters and fishermen and indigenous gathering rights.

I come here today with a lot of concern. The fish and wildlife service has proposed a plan that will cut -- put a road through a crucial Palila habitat which is protected by the Endangered Species Act. In return they will take land on the opposite side of Mauna Kea, Pu'u Mall, to compensate for the loss. What gives of U.S. Fish and Wildlife that right to decide that? They are depriving me of my hunting areas in Pu'u Mall.

I am also a member of the Operating Engineers construction work company. I have no objection against the redoing of this road. But I will not see a new road go through my Palila habitat, prime mamane forest.

And let me tell you something. We are big enough today where we can make a

1 difference who gets in office. So take that into  
2 consideration. And as a Native Hawaiian --  
3 endangered species, the law states that we cannot  
4 even cut a branch or root from there. And you  
5 will improve on the roads?

6 So the Fish and Wildlife Service  
7 needs to redo their mitigation package. A hundred  
8 something acres we will lose over there. I am not  
9 going to take 10,000 acres for that. No way. So  
10 it's good -- I am in support -- our group is in  
11 support of the construction to better the safety  
12 of all motorists. But not through that crucial  
13 habitat. Thank you very much.

14 MR. MOORE: At this time I would  
15 like to call David Bigelow.

16 DAVID BIGELOW: Good evening. I'm  
17 Dave Bigelow. I live in Waiki'i Ranch. And I  
18 represent the Waiki'i Ranch Homeowner's  
19 Association. Waiki'i Ranch Homeowner's  
20 Association, we support the construction of the  
21 highway with several reservations.

22 One of the main purposes of this  
23 highway is to connect the two population centers  
24 of the island, Hilo and Kona. And we believe that  
25 W-3 best serves that purpose.

We oppose the W-2 alignment.

1 W-2 -- Waiki'i Ranch is right here (indicating).  
2 And this section right here of W-2 passes within  
3 1300 feet of the boundary of our community. Those  
4 of you who are not familiar with Waiki'i Ranch,  
5 there are 130, ten, twenty and forty-acre lots  
6 there with another seventy coming under  
7 development in the near future.

8 We are uphill. There will be a  
9 constant noise problem there. Also, this section  
10 here coming up hill will put traffic lights all  
11 night long right into our community.

12 The projected 14,000 cars a day --  
13 I don't know how many of those will be at night.  
14 But our community is opposed to the W-2 alignment  
15 for both noise and light pollution reasons.

16 In addition, although it hasn't  
17 been specifically stated, the existing Saddle  
18 Road, there has been some talk about deadending it  
19 up here at its terminus or at the proposed  
20 junction near Milepost 42. And, apparently, that  
21 has not been decided whether or not to do that.  
22 We would oppose deadending the existing Saddle  
23 Road for reasons that we have people in our  
24 community that commute on a daily basis to Hilo.  
25

1 And it would add approximately somewhere between a  
2 half hour and one hour to their commute times.

3 Also, the specter of brush fires or  
4 grassland fires is a constant problem for us. And  
5 we have had those in the past. The very first  
6 fire company that always arrived has been the  
7 Papakolea Fire Company from here (indicating).  
8 And if that is the road we have deadended, it  
9 would cut off access.

10 For those reasons we, again,  
11 support the W-3 alignment, and we oppose the W-2  
12 alignment, and we oppose deadending the existing  
13 Saddle Road at the mile marker 42. Thank you very  
14 much.

15 MR. MOORE: Thank you. Noelani  
16 Whittington.

17 NOELANI WHITTINGTON: Good evening  
18 everyone. I am Noelani Whittington, and I  
19 represent the Kona Kohala Resort Association,  
20 which is a group of hotels and resorts from the  
21 Four Seasons down to Mauna Kea. And we support  
22 the Draft EIS and have a couple of comments to add  
23 to that support.

24 Basically, it is based on the  
25 support of the efficiency. That means the ability

1 to transport goods cross-island as well as a  
2 number of our employees live in Hilo and work  
3 here. We believe this road would lessen their  
4 commute and allow goods and services to come cross  
5 country at a much more cost efficient -- route  
6 area.

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7 The other thing is the safety  
8 factor. We all know Saddle Road as it is now is  
9 basically one lane. And to use it for two lanes  
10 is kind of chancy.

11 Lastly, we support route W-2 with a  
12 realignment of Saddle Road so it would connect at  
13 the Waikoloa Road to Mamalahoa. And we see this  
14 as a very safe, efficient, convenient, and direct  
15 route for Saddle Road realignment to take. Thank  
16 you.

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17 MR. MOORE: Thank you. Barney  
18 Magrath.

19 BARNEY MAGRATH: Good evening.

20 Thank you. I am Barney Magrath, a resident of  
21 Waimea. And I work for the Canada-France  
22 Telescope. I am going to speak on two aspects.

23 One of them is from a commuter aspect where we use  
24 this road every day to go up to the summit. And  
25 to use the new road here looks like it will add

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1 another twenty minutes to thirty minutes if the  
2 old road is not available.

3 So what's going to happen if we  
4 have to take extra time? Well, we won't take this  
5 road. We will just keep using this road  
6 (indicating). So we would like to see this road  
7 fixed. Because, if not, then it just -- and it's  
8 not available, then we will have to take this road  
9 and just add it to our time. Section one is what  
10 we are worried about.

11 Secondly, I'd like to speak for a  
12 really dangerous fringe element on this island,  
13 bike riders. You know the people that nobody ever  
14 thinks about when they build a road or at least  
15 they haven't until now.

16 It's very dangerous to ride a bike.  
17 And any project that proposes increasing the  
18 safety of a roadway by putting shoulders on it, I  
19 am all for that, and I'm pretty sure most bike  
20 riders on the island are. And that's all I have  
21 to say. Thank you.

22 MR. MOORE: Thank. Next is Henry

23 Roxburgh.

24 HENRY ROXBURGH: My name is Hank  
25 Roxburgh. I live in Hilo, Hawaii. And I am

1 concerned about the Saddle Road. I am for the new  
2 highway through there. Many times I worked on  
3 this side commuting from Hilo to Kona and working  
4 there. And I take two hours sometimes to get  
5 over.

6 I'm not saying it is going to  
7 shorten time by traveling over that road. But I  
8 think as far as safetywise, I saw a lot of people  
9 get killed on the roads traveling 4:00 in the  
10 morning and all that because of the winding roads  
11 and all that, especially Saddle Road. And  
12 sometimes we kind of think of taking that road.

13 But if we had a nice road -- I know  
14 this is just a hearing, that we are for or  
15 against. But I am in favor of a freeway or  
16 highway through that road. I don't want to step  
17 on anybody's toes. Because I feel that is a good  
18 hunting ground too.

19 The Out Circle -- it's a beautiful  
20 road to drive on. But we also got a lot of roads  
21 down on the Hamakua drive that we drive and we  
22 see. But what I'm concerned about is commuting  
23 back and forth for workers. We just can't  
24 relocate and -- we got our family and roots in  
25 Hilo. And also people that live in Kona have

1 their roots here.

2 It's a big island. It's not like  
3 Oahu where you can travel here and there in about  
4 half an hour. Here it takes two hours. And it's  
5 dangerous driving back and forth. I'm for the  
6 road. And yet restrict it in areas, as you know  
7 -- for people who are against it. And I believe  
8 that, you know, that's why we are here for, to  
9 hear what we have to say. Thank you.

10 MR. MOORE: Thank you. Kathy  
11 McMillan.

12 KATHY McMILLAN: Hi. My name is  
13 Kathy McMillan. I'm a citizen of Kailua-Kona. I  
14 am here in support of the project.

15 First, I would like to say I  
16 appreciate the work that was done on this project  
17 and particularly the communication provided to the  
18 community.

19 I think a lot of projects, public  
20 projects, move a lot smoother if we have the  
21 amount of communication we had on this one.  
22 Particularly the insert in the West Hawaii today  
23 was a great idea. I know for a fact a lot of  
24 environmentalists who are usually opposed to many  
25 projects are not here tonight because they are

1 satisfied with how well the project has been  
2 covered.

3 First, I would like to say that my  
4 main concern about this is the impact of this  
5 project is not done. Hazards to motorists on this  
6 road presently in its present condition is  
7 completely unacceptable to me.

8 Of greater concern to me is if you  
9 are facing reality, I would love for this island  
10 to stay the way it is. But this is reality. It's  
11 not. It's the last place in Hawaii. It's going  
12 grow. If you don't build the roads, people are  
13 going to still come, and you will have a worse  
14 problem.

15 Of greater concern to me is if this  
16 road is not built that far, far worse  
17 environmental and safety problems will occur on  
18 the north road going through Waimea and the north  
19 coast of Hilo. That's a beautiful road now. It's  
20 the one I travel. I do not travel Saddle Road  
21 because it's dangerous. I take the northern  
22 route.

23 If we do not do something, people  
24 are going to come here, and that will become  
25 heavily trafficked, and it will be far worse. It

1 will be ruined.

2 So I really feel strongly that  
3 we've got to deal with the future and change our  
4 planning a little ahead of time here.

5 So keep up the good work, and let's  
6 get decisions. I live in Kona. And I would love  
7 to have the W-3 route for my own personal  
8 preferences. However, from a planning standpoint,  
9 the W-2 route makes more sense for the island. So  
10 even though for me W-3 makes more sense, let's be  
11 a community and do what makes sense for the  
12 transportation system on this island and do the  
13 W-2 route. Thank you.

14 MR. MOORE: The last speaker --  
15 this is your last chance to sign up for testimony  
16 -- is Anne Peterson.

17 ANN PETERSON: Aloha. My name is  
18 Anne Peterson. I am with the organization PATH,  
19 People's Advocacy for Trails Hawaii. I am a  
20 little nervous too.

21 PATH is dedicated to traffic  
22 safety, education, and providing a safe  
23 environment on our roadways and trails. And I  
24 would like to speak in support of the project.

25 Specifically, the paving of the

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1 shoulders. If we could get that paved in the same  
2 quality as the car lanes, cyclists will be more  
3 apt to use the shoulders and stay off the  
4 roadways.

5 And if we could add the inverted  
6 rumble strips such as have just been added on to  
7 the Queen Kaahumanu Highway from Keahole Airport,  
8 that would be wonderful. Those rumble strips, if  
9 you haven't experienced them, if a car tends to go  
10 over on the side of the road, they are instantly  
11 alerted with a really big vibration and sound. So  
12 it increases the safety. And I think this whole  
13 project increases the safety for the -- for those  
14 traveling along it. And I am in support of it.

15 A couple comments about the other  
16 comments that have been made here. That is the  
17 beauty of going last. I really want to speak in  
18 support of the concept brought up by the Chamber  
19 of Commerce to add a bridge. I know bridges are  
20 expensive. But that's a wonderful safety feature.

21 And the other -- and this is  
22 personal opinion, not an opinion of PATH. But I  
23 have a concern over the PTA route that would  
24 affect the bird population there. That's just an  
25 individual comment. Thank you very much.

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1 MR. MOORE: Thank you very much.  
 2 That concludes the public testimony portion of  
 3 tonight's proceedings.

4 I would like to now begin the  
 5 question and answer period. There were four sets  
 6 of questions that have been submitted. Is our  
 7 project team available? Let's get them up here so  
 8 we can start answering questions.

9 The first one is a series of  
 10 questions. And I will ask them individually.

11 The first question is, "Will there  
 12 be a restrictions on the type of vehicles that can  
 13 use the road?" Bert?

14 BERT McCAULEY: Bert McCauley  
 15 Federal Highway Administration. Are there  
 16 restrictions on the types of vehicles that can use  
 17 the road?

18 We said in the environmental  
 19 document that all of the alternatives we will be  
 20 considering, climbing lanes and passing lanes and  
 21 pullouts for slow moving vehicles to pull over or  
 22 to park -- and so the Hawaii Department of  
 23 Transportation, they were not going to consider  
 24 placing any restrictions on the roadway as far as  
 25 the type of vehicles that would be using it. All

1 types of trucks and passenger vehicles will be  
 2 able to use the road.

3 MR. MOORE: The next question is,  
 4 "If alternative W-2 is selected will Waikoloa Road  
 5 be improved with similar improvements to handle  
 6 the additional traffic?"

7 BERT McCAULEY: This project is --  
 8 the line of this project is Mamalahoa Highway to  
 9 Milepost 6 in Hilo. And the alternative between  
 10 those two midpoints will function as a singular  
 11 roadway that makes sense between those two  
 12 locations.

13 Once this process is finished,  
 14 there will be a preferred alternative selected  
 15 between those two ends. And beyond that, the  
 16 Hawaii Department of Transportation will be  
 17 looking at the other connections between Mamalahoa  
 18 Highway and State Route 19 under a whole other  
 19 process very similar to this one. Route  
 20 alternatives to be looked at, alternative  
 21 alignments, and mitigation, traffic patterns, and  
 22 environmental impact, types of -- et cetera. That  
 23 would be a separate process, and it would be based  
 24 on where the end of this project was.

25 MR. MOORE: Bruce, can you comment

1 on the State's plans for -- this is Bruce McClure  
2 with the Department of Transportation.

3 BRUCE MCCLURE: We currently have a  
4 project looking at wherever they terminate the  
5 Saddle Road Highway at Mamalahoa down to the Queen  
6 Kaahumanu Highway. So we would look at the  
7 different alternatives, one of which would be  
8 improvements to the Waikoloa Road.

9 MR. MOORE: Thank you. The last  
10 question of this series is, "Are more rest areas  
11 planned to offer scenic and cultural areas for our  
12 visitors?"

13 BERT MCCAULEY: All of the  
14 alternatives in this project included  
15 consideration that there would be pullouts or  
16 vista points looked at in more detail on each of  
17 the alternative routes or whichever the preferred  
18 route was that was eventually selected.

19 These would not be -- it's not been  
20 considered that these would be full rest stops  
21 with rest rooms and things of this kind. It would  
22 be more of the vista type of pullout with parking  
23 and some type of interpretive sign maybe to give  
24 somebody an idea what they were looking at. But  
25 not with rest rooms and so forth.

1 MR. MOORE: Thank you. The next  
2 question is, "Will the new Saddle Road Highway be  
3 built on critical Palila habitat?"

4 I will address that briefly.  
5 Portions of PTA-1 and PTA-3 are within the  
6 critical habitat. If those routes are selected,  
7 they will be extended through there, and  
8 appropriate mitigation under the Endangered  
9 Species Act will be required. It depends on which  
10 route is selected.

11 Again, the existing Saddle Road,  
12 EX-2, doesn't extend to the critical habitat. So  
13 it really depends on the final selection.

14 Again, following up on some recent  
15 statements, "Can shoulders be paved with high  
16 quality asphalt to allow for bicycle use?"

17 And why don't you address, "Can an  
18 inverted rumble strip be added between the car  
19 lane and the shoulder?"

20 BERT MCCAULEY: Sure. It's  
21 envisioned that the section on this roadway would  
22 be the same slope, cross slope, all the way across  
23 so there would be no dropoff at the shoulder and  
24 that there would be a full depth pavement all the  
25 way out to the shoulder edge so that the shoulder



1 -- in other words, it would be structurally  
 2 designed on the shoulder so there wouldn't be any  
 3 breaking up on the shoulder if people did move  
 4 over it and drive on it occasionally, and that  
 5 there would be the same type of surface,  
 6 completely paved in full, twelve-feet plus the  
 7 eight foot shoulder.

8 And the edge of the shoulder would  
 9 be -- the edge of the travel lane would be striped  
 10 with the white stripe. And the Hawaii Department  
 11 of Transportation tells me that it's not common  
 12 practice to use those rumble strips unless it's a  
 13 hazardous, really hazardous location and warrants  
 14 it.

15 And particularly if it's high  
 16 bicycle use, the design of those things, the depth  
 17 and width of those things, can become a hazard to  
 18 bikes if the bike were to get a wheel caught in  
 19 that. So they would much rather use the white  
 20 raised pavement markers that are reflective  
 21 because there would be no lighting along the  
 22 Saddle Road, and headlights would light up that  
 23 edged line as well as the white strip. And they  
 24 also provide some noise for tires striking them if  
 25 the tire of the car starts to wander off of the

1 shoulder. So that's their reasoning on that.

2 MR. MOORE: The next question -- I  
 3 think, Bert, you will get this one again.

4 "What is the percentage of total  
 5 project cost -- what percentage of the total  
 6 project cost is for remediation purposes? Can you  
 7 break this down by type?"

8 BERT MCCAULEY: I would like to  
 9 defer to Reggie on that, if I could.

10 REGGIE DAVID: I'm Reggie David.  
 11 And I have been working on the biological  
 12 mitigation for the project.

13 In rough figures, approximately,  
 14 the construction cost for this will be about \$150  
 15 million. If either PTA-1 or PTA-3 is selected for  
 16 construction, approximately ten percent of the  
 17 \$150 million -- it will generate about \$15 million  
 18 worth of mitigation.

19 If EX-2, the existing alignment, is  
 20 selected, the mitigation will come in somewhere  
 21 between one and two percent. We are not totally  
 22 sure of the exact number because we are still  
 23 working on some of the mitigation costs, mainly  
 24 wetlands issues on the east side.

25 The breakdown -- rough breakdown if

1 we select PTA-1 or PTA-3 is that approximately \$5  
 2 million of the 15 will be spent on physical  
 3 barriers, basically extra paved shoulder for fire  
 4 mitigation and some fire management modeling. And  
 5 approximately \$10 million will be spent on land  
 6 acquisition and management for Palila habitat.

7 MR. MOORE: Don't go away, Reggie.  
 8 One more question. The last question is, "Please  
 9 address the issue raised about trading 100 acres  
 10 for 10,000 acres for the Palila habitat."

11 REGGIE DAVID: Okay. It's a  
 12 fairly complex issue. What it comes down to is  
 13 that Palila is a very picky bird. And they have  
 14 to have mamane to survive.

15 The scientists who have been  
 16 working on Palila for the last nine years found  
 17 out that Palila need a fairly extensive altitude  
 18 gradient in a mamane forest to be able to survive.  
 19 During the course of the research, they also found  
 20 out that the area along PTA-3 or 1 -- Bill, could  
 21 you put up that overhead?

22 (Pause.)

23 REGGIE DAVID: This area right in  
 24 here (indicating) and this stretch of mamane  
 25 forest here was identified as the number one

1 choice for a site to translocate Palila to start a  
 2 second population. Most of the birds right now  
 3 are centered right around the Iau Ranch area right  
 4 here, about eighty percent of the population.

5 By going through critical habitat  
 6 here we are fragmenting this piece of forest. So  
 7 we are not just taking the 100 acres. We are  
 8 actually disturbing a fairly larger area of  
 9 potential habitat.

10 In looking at areas to potentially  
 11 use for Palila, they identified an area up in  
 12 here, an area right up in here (indicating), which  
 13 already has a nice remnant of mamane forest in it  
 14 and abuts the Mauna Kea Forest Reserve.

15 Basically, the logic being that the  
 16 birds which are being translocated to this area  
 17 now, once this area is brought back to  
 18 rehabilitate it, basically, the birds will  
 19 probably move down into here (indicating).

20 The various agencies working on  
 21 this also want to ensure that they had a  
 22 redundancy factor built into the mitigation.

23 Because it's not a hundred percent sure that if  
 24 you release birds in here that it's going to work.  
 25 So they identified two other areas.

1 One right here, the Ka'ohē game management area.  
2 And another section here, the NPRC and NTA has two  
3 additional sites.

4 MR. MOORE: Thank you, Reggie.  
5 That concludes the question and  
6 answer portion of the hearing.

7 We thank you very much for your  
8 presence here today and your participation at the  
9 public hearing. We invite you to browse through  
10 the exhibit stations after the close of the  
11 hearing. Again, they will continue to be manned  
12 for as long as we have questions requiring it for  
13 your information. Again, I remind you that the  
14 common period for this will be accepted until  
15 December 22, 1997. It is now 9:22 p.m. I declare  
16 this public hearing to be closed.

17 (Whereupon, the hearing adjourned at  
18 9:22 p.m.)  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE

1 STATE OF HAWAII )  
2 )  
3 ) SS.  
4 COUNTY OF HONOLULU )


5 I, WILLIAM T. BARTON, RPR, Certified  
6 Shorthand Reporter, State of Hawaii, do hereby  
7 certify:

8 That on December 11, 1997 at 7:00 p.m. there  
9 occurred before me the above proceedings contained  
10 herein;

11 That I am neither counsel for any of the  
12 parties herein, nor interested in any way in the  
13 outcome of this hearing;

14 That the statements herein were by me taken  
15 down in machine shorthand and thereafter reduced  
16 to print via computer-aided transcription under my  
17 supervision; that the foregoing represents a  
18 complete and accurate transcript of the above  
19 proceedings to the best of my ability.

20 Dated this 26th day of December 1997, at  
21 Honolulu, Hawaii.

22   
23 WILLIAM T. BARTON, CSR No. 391  
24 Certified Shorthand Reporter  
25



U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
CENTRAL, FEDERAL LANDS HIGHWAY DIVISION  
COUNTY OF HAWAII,  
STATE OF HAWAII  
FHWA Project No. A-AD-6(1)

IN RE: )

SADDLE ROAD (State Route 200) )

MAMALAHOA HIGHWAY (State Route 190) )

to Milepost 6 )

----- )

HEARING FOR PUBLIC COMMENT

Taken at the University of Hawaii-Hilo, Wentworth  
Hall Room 1, 200 West Kawili Street, Hilo, Hawaii  
commencing at 9:00 a.m. on December 13, 1997.

Before: WILLIAM T. BARTON, RPR, CSR NO. 391  
Court Reporter, State of Hawaii

APPEARANCES, AMONG THOSE IN ATTENDANCE:

- WILLIAM MOORE, MODERATOR, Okahara & Associates
- David Gedeon, FHWA, Project Manager
- Bert McCauley, FHWA, Environmental Project Manager
- Nancy Burns, Okahara & Associates, Project Manager and Lead Engineer
- Jay Uyeda, Okahara & Associates, Senior Environmental Planner
- Leslie McGaughey, EcoPlan & Associates, Senior Environmental Planner
- Reggie David, Rana Productions, Biologist
- Ron Terry, Geometrician, Environmental Scientist
- Tom Wolforth, Paul H. Rosendahl, Inc., Archaeologist
- Grant Gerris, PhD, Botanist/Wetlands Specialist
- Kenneth Au, DOT Highways Division, Advance Planning Engineer
- Michael Lee, DOT, Rights-of-Way Branch
- Mary Ann Naber, Advisory Council on Historic Preservation, Preservation Specialist
- David Heaukulani, PTA, Executive Officer





1 First, from the State of Hawaii,  
 2 Mr. Stanley Tamura, acting district engineer,  
 3 Hawaii Department of Transportation. From the  
 4 U.S. Army, Lieutenant Colonel David Hergenroeder,  
 5 commander of the Pohakuloa Training Area. From  
 6 the county of Hawaii, Ms. Donna Kiyosaki, chief  
 7 engineer. And from the Federal Highway  
 8 Administration, Mr. Glenn Yasui, transportation  
 9 engineer, Hawaii division.

10 The purpose of this public hearing  
 11 is for us to present to you what planning has  
 12 taken place on the proposed project to date and  
 13 receive information from you about any  
 14 considerations you would like us to make in  
 15 further development of the project.

16 All the information, whether  
 17 submitted in writing at this hearing, through the  
 18 mail, or expressed verbally in testimony today  
 19 will be given full and equal consideration in  
 20 future project decisions. We are requesting that  
 21 you submit all written comments to the addresses  
 22 given in your handouts no later than December 22,  
 23 1997.

24 I would like to now turn the  
 25 meeting over to our moderator for the morning, Mr.

1 Bill Moore of Okahara & Associates, who will  
 2 introduce other officials and staff present at the  
 3 hearing today and explain further the purpose of  
 4 this hearing and review the agenda. Again, thank  
 5 you all for coming today.

6 Bill?

7 MR. MOORE: Thank you, Larry.

8 Good morning. Let me take a moment to introduce  
 9 some of the public officials and team members here  
 10 today.

11 First of all, I would like to recognize  
 12 our counselman from the Puna South Kohala -- Kona  
 13 District, John Santangelo.

14 I would also like to recognize  
 15 Kenneth Au from the Department of Transportation,  
 16 highway division, advanced planning engineer, way  
 17 in the back.

18 Michael Lec with the Department of  
 19 Transportation, Rights-of-Way branch.

20 I would also like to recognize Mary  
 21 Ann Naber from Washington D. C. She is on the  
 22 Advisory Council on Historic Preservation and is a  
 23 preservation specialist.

24 I would also like to recognize and  
 25 thank David Heaukulani. He is the executive



1 officer at Pohakuloa Training Area.

2 The project team members that are  
3 here today include Dave Gedeon with the Federal  
4 Highway Administration. He is the project  
5 manager.

6 Bert McCauley also from the Federal  
7 Highways Administration. He is the environment  
8 project manager.

9 Nancy Buxns from Okahara &  
10 Associates is the project manager and lead  
11 engineer.

12 Jay Uyeda is the project engineer  
13 from Okahara & Associates.

14 Leslie McGaughy from Scoplan  
15 Associates is a senior environmental planner  
16 there.

17 Reggie David from Rana Productions  
18 is our biologist.

19 Ron Terry, a geometrician, is an  
20 environmental scientist on this project.

21 Tom Wolforth from Paul H.  
22 Rosendahl, Incorporated is an archeologist.

23 And Grant Gerris, PhD., is a  
24 botanist and our wetlands specialist at this time.

25 The purpose of today's public

1 hearing is to discuss the location and design of  
2 the proposed Saddle Road improvements from the  
3 Mamalahoa Highway in the South Kohala District to  
4 Milepost 6 on the existing road in the South Hilo  
5 District.

6 No final decision has been made to  
7 implement this project. All alternatives  
8 presented here today, including the No Action  
9 Alternative, will be studied further, considering  
10 all public comments received at hearings and by  
11 mail during the comment period which ends December  
12 22, 1997.

13 A final decision will be made by  
14 the Federal Highway Administration in consultation  
15 with the Hawaii Department of Transportation, the  
16 U.S. Army, and the County of Hawaii represented by  
17 the Hawaii Department of public works after all  
18 comments are received.

19 This public hearing is being held  
20 for several reasons. First, this is a means of  
21 informing you of the Federal Highway  
22 Administration's plans that are being developed  
23 through their Federal Lands Highway Division in  
24 coordination with the State Department of  
25 Transportation. This planning is being funded by

1 the Department of Defense with the Military  
2 Traffic Management Command administering the funds  
3 along with the Federal Lands Highway Division.

4 The intent of the discussions today  
5 is for you to be informed completely so that you  
6 are able to determine on a factual basis how you  
7 as a property owner, motorist, business owner, or  
8 other interested citizen may be affected either  
9 beneficially or adversely by the proposed project.

10 Secondly, the public hearing is  
11 being held so the Federal Highway Administration  
12 and the other Federal, State, and County agencies  
13 with whom they will consult may obtain facts not  
14 previously brought to their attention in  
15 connection with the location and design of the  
16 proposed project.

17 Lastly, the hearing is a  
18 requirement of the National Environmental Policy  
19 Act, better known as NEPA, for any project which  
20 uses federal funds. It is also in accordance with  
21 the State of Hawaii's Environmental Impact  
22 Statement requirements as contained in Chapter 343  
23 of the Hawaii Revised Statutes.

24 Notices of today's public hearing  
25 were published in the Hawaii Tribune Herald, West

1 Hawaii Today, and the Honolulu Star Bulletin on  
2 November 11th and December 3rd.

3 Now I would like to review the  
4 agenda for the hearing with you.

5 First, we will present a video  
6 which will describe some of the problems with the  
7 existing road that was been identified and explain  
8 the project's purpose and need, as well as the  
9 various alignments under consideration.

10 Secondly, we will have Leslie  
11 McGaughey from a consulting firm, EcoPlan  
12 Associates, present an overview of the impacts  
13 that are associated with the various alternative  
14 routes and the mitigation that is being proposed  
15 to offset those impacts.

16 The video presentation should take  
17 approximately 30 minutes.

18 Third, we will then recess for  
19 about forty minutes to give you an opportunity to  
20 visit the exhibit stations for more detailed  
21 information or ask any questions that you may have  
22 after the presentations. The exhibit stations  
23 include a project overview, or general information  
24 of the project is available.

25 In addition, we have more detailed

1 information on engineering and right-of-way,  
 2 biological issues, cultural resources and social  
 3 and economic issues.

4 Please note that at any time during  
 5 the recess you may present verbal statements to  
 6 the recorder who is sitting here, Mr. Bill Barton,  
 7 for inclusion in the official transcript of the  
 8 hearing. During the recess you may also fill out  
 9 a question card at the exhibit station or return  
 10 to the registration table to indicate by your name  
 11 that you wish to testify. There are also comment  
 12 cards available at the registration desk if you  
 13 want to provide some written comments.

14 Fourth, we will then reconvene  
 15 after the recess and receive your testimony or  
 16 statements.

17 Fifth, immediately following your  
 18 testimony, we will have a question and answer  
 19 session.

20 Following the question and answer  
 21 session, the project key members will again man  
 22 the exhibit stations to follow up with any  
 23 questions you may have or to provide you with any  
 24 further information.

25 I would like to cover some of the

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12  
 1 important guidelines for the conduct of this  
 2 public hearing.

3 First, the purpose of this hearing  
 4 is to solicit information on the project and to  
 5 hear your concerns. The hearing is not a debate  
 6 on the proposed improvements, nor is this hearing  
 7 intended to be a popular referendum, either for or  
 8 against the Saddle Road project.

9 Further decisions on the Saddle  
 10 Road project will be made based on the full  
 11 record, including the input from this public  
 12 hearing, the Draft Environmental Impact Statement,  
 13 and written comments received by December 22,  
 14 1997.

15 We do want to extend to you every  
 16 opportunity to voice your concerns and to present  
 17 any new facts that the Federal Highways  
 18 Administration and other consulting agencies may  
 19 not be aware of or had not fully considered.

20 Secondly, we want to emphasize the  
 21 importance of your testimonies. All proceedings  
 22 of the hearing are being recorded. So it is  
 23 important that all of your statements are clearly  
 24 spoken into the microphone. Before beginning your  
 25 statement, please state clearly your name, place

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1 of residence, and any affiliation you wish to make  
2 known. Your testimony should be brief, factual  
3 and courteous to those present.

4 Please stick to the subject matter  
5 of today's public hearing, which is the proposed  
6 Saddle Road project. We also ask that you be  
7 courteous to each other and respect everyone's  
8 opinion and their right to be heard. As  
9 moderator, it will be my responsibility to keep  
10 this hearing on track and to make sure that  
11 everybody who wants to speak has a chance.

12 Third, all those wishing to testify  
13 are asked to complete a hearing testimony form at  
14 the registration desk. Oral testimony will be  
15 received in the order that the forms were  
16 submitted. Speakers will be limited to three  
17 minutes so that everyone has an opportunity to  
18 testify.

19 Again, just to remind you, you may  
20 also provide your written comments to us on the  
21 comment sheet which is available at the  
22 registration desk.

23 Fourth, for those wishing to just  
24 ask questions, you may write your question on a  
25 question card which is available at the

1 registration desk and the exhibit stations. These  
2 question cards can be turned into anyone at the  
3 registration desk or at the exhibit stations  
4 during the recess. We will respond to those  
5 questions after the testimony portion of the  
6 hearing is completed.

7 We want to bring to your attention  
8 the subject of relocation advisory assistance and  
9 relocation payments which are authorized by  
10 Federal and State laws. There are two types of  
11 relocation services authorized to aid persons,  
12 businesses, farms, and nonprofit organizations who  
13 might be required to relocate because of the  
14 proposed project. One is relocation advisory  
15 assistance, and the other is relocation payments.

16 Both are fully described in the  
17 brochure entitled "Relocation Advisory Assistance  
18 and Relocation Payments." Copies are available at  
19 the registration desk and at the exhibit station  
20 labeled "Engineering and Right-of-Way." Questions  
21 concerning relocation assistance may also be  
22 answered by submitting them in writing to the  
23 Hawaii Department of Department of Transportation,  
24 Rights-of-Way Branch, Property Management Section,  
25 888 Mililani Street, Room 502, Honolulu, Hawaii

1 96813. Attention Michael Amuro.

2 The Hawaii Department of  
3 Transportation Rights-of-Way branch can also be  
4 reached by phone at 587-2020. There is also a  
5 toll free number 1-800-468-4644, extension 72020.

6 Some of you may be here to learn  
7 more about the project and may not be ready to  
8 submit statements today. The Federal Highway  
9 Administration and the Hawaii Department of  
10 Transportation will continue to accept written  
11 statements through December 22, 1997. The  
12 addresses for submitting written statements are  
13 given in the project bulletin and on the comment  
14 sheets available at the registration desk. These  
15 addresses are also given in the Draft EIS and  
16 public notices that appear in the paper.

17 Following the public hearing, staff  
18 of the Federal Highways Administration in  
19 consultation with the Hawaii Department of  
20 Transportation, the County of Hawaii, and the U.S.  
21 Army will evaluate your statements and information  
22 presented today together with the factual data  
23 they have already received. Further decisions  
24 concerning the location, design, and environmental  
25 mitigation for this project will be made taking

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1 into account all factual data received through the  
2 public hearings and written comment period.

3 Further project decisions will be  
4 presented in the Final Environmental Impact  
5 Statement which is scheduled for release in the  
6 spring of 1998. If you wish to be notified of  
7 further developments of this project, please be  
8 sure to place your name and address on the  
9 registration sheet at the registration desk before  
10 you leave to today. These sheets will be used for  
11 a mailing list for notifying you of further  
12 project development.

13 I would like to also mention that  
14 all information developed, including statements  
15 received during public hearings and written  
16 comments during the written comment period, will  
17 be available upon request for public inspection  
18 within two to three weeks of the conclusion of the  
19 comment period of December 22, 1997.

20 This information will be available at  
21 the Federal Highways Administration and the Hawaii  
22 Department of Transportation locations given in  
23 the project bulletin.

24 At this time, I would like to begin  
25 the video presentation.

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(whereupon a video presentation commenced for approximately 13 minutes.)

MR. MOORE: This concludes the video portion of this hearing. At this time I would like to introduce Ms. Leslie McGaughey to present a summary of the key social, economic, and environmental impact of the proposed project that have been identified at this time and a summary of the mitigation measures being proposed to offset those impacts.

LESLIE MCGAUGHEY: Good morning. As covered in the video, the proposed improvements to Saddle Road would address five general types of needs for existing roadway deficiencies.

One, roadway geometric and pavement deficiencies.

Two, conflicts and hazards associated with combined public and military use of Saddle Road.

Three, traffic capacity deficiencies.

Four, motorist safety problems.

And, five, social demand and economic development.

To address the potential

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environmental consequence of improving Saddle Road an Environmental Impact Statement or EIS process was undertaken. A team of engineers, scientists, and planners was assembled to identify and evaluate environmental resources within the project area.

Literature searches, interviews, and field surveys were conducted for biological, socioeconomic, and other resources potentially affected by the project.

For cases where environmental impacts could not be avoided, mitigation measures were developed to offset those impacts.

Key impacts and mitigation measures are summarized as follows. Please note that this is not a complete list of impacts and mitigation but is intended to be an overview of the more notable issues. Project representatives will be available during the recess to answer questions and provide you more detail.

For the evaluation of impacts to biological resources special consideration was given to listed threatened and endangered species or those proposed to be listed as threatened or endangered and any critical habitat designated for

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1 protection of these species pursuant to the  
2 Federal Endangered Species Act.

3 The key impacts on these resources  
4 anticipated with all of the action alternatives  
5 include:

6 One, the potential to disturb  
7 several endangered bird species.

8 Two, an increase in the threat of  
9 unplanned wildfires in fire sensitive areas with  
10 the increase in traffic.

11 Three, the potential to impact  
12 kipuka located along the project area on the east  
13 end.

14 Four, a greater risk of disturbance  
15 of native habitats and species from increased  
16 human access to the Saddle area.

17 Five, an increased potential for  
18 the spread of alien insects and plants along the  
19 project corridor.

20 And, six, the loss of existing  
21 wetland areas within the proposed project area on  
22 the east end.

23 If segments PTA-1 or PTA-3 are  
24 selected for the project, approximately 100 acres  
25 of critical habitat for the endangered Palila will

1 be modified within the Pohakuloa Training Area.

2 The major components of the  
3 biological mitigation for all action alternatives  
4 are as follows:

5 One, any listed threatened or  
6 endangered plant species or those proposed to be  
7 listed which were identified during the field  
8 surveys will be fenced off from construction  
9 activities at the right-of-way line.

10 Two, all construction activity will  
11 be restricted to the clearly delineated  
12 right-of-way, and construction equipment entry  
13 will be through nonsensitive preselected  
14 locations.

15 Three, all construction equipment  
16 will be steam-cleaned and fumigated before being  
17 transported to the construction site to ensure  
18 that no weeds or alien insects are transported  
19 there.

20 Four, all efforts will be made to  
21 design the segments to balance earthwork  
22 quantities so that minimal outside fill sources  
23 which could introduce alien species will be  
24 required for the project.

25 Five, all efforts will be made to

1 design the segments to avoid disturbance to  
 2 kipuka.  
 3  
 4 Six, contractors will follow  
 5 special construction requirements to avoid  
 6 nighttime impacts to nesting seabirds and other  
 7 impacts to hawks and upland endangered bird  
 8 species.  
 9 Seven, for portions of segments  
 10 EX-2, PTA-1, and PTA-3, the proposed roadway  
 11 typical section will be modified to include an  
 12 additional 8 foot paved fire break separated from  
 13 the roadway by a wire fence and curb to discourage  
 14 vehicle access to the forest.

15 Eight, a fire ecologist will be  
 16 retained to develop a fire management model, and a  
 17 comprehensive fire management plan will be  
 18 developed.  
 19 And, nine, a Clean Water Act  
 20 section 404 Corps of Engineers Permit will be  
 21 obtained to address impacts to wetlands.

22 Additional mitigation commitments  
 23 are proposed if segments PTA-1 or PTA-3 are  
 24 selected.

25 These include, one, a total of  
 9,345 acres will be set aside as Palila critical

1 habitat mitigation lands in the Pu'u Mali, Kipuka  
 2 Alala, and Ka'ohe lease areas, with the goal of  
 3 regenerating mamane forest for the eventual range  
 4 expansion or translocation of endangered Palila.  
 5 All critical habitat mitigation lands will be  
 6 fenced to exclude feral ungulates, such as pigs  
 7 and sheep. Provisions will be made for hunter  
 8 access, and predator control and monitoring will  
 9 be undertaken.

10 Two, intensive studies of the  
 11 critical habitat mitigation lands will be  
 12 undertaken to assist in formulating management  
 13 plans to be implemented over a ten-year period.

14 For socioeconomic resources the key  
 15 impacts or benefits are:

16 One, improved business  
 17 opportunities and reduced business and commuting  
 18 time between Hilo and Kona -- excuse me,  
 19 Kona/South Kohala by as much as twenty to thirty  
 20 minutes each way.

21 Two, temporary delays and  
 22 inconvenience to residents of Upper Kaumana and  
 23 motorists on Saddle Road during construction.

24 Three, improved access to hunting  
 25 and other recreational areas, increasing the risk



1 of damage from off-road vehicles.

2 Four, loss of some existing

3 ranching and hunting lands.

4 Five, an improvement in traffic

5 flow and access to the Saddle area.

6 Six, loss of mamane forest and

7 potential to impact kipuka, each with potential

8 value to Native Hawaiians.

9 Seven, an increase in employment

10 from construction activities.

11 And, eight, improved safety for

12 motorists, bicyclists, and pedestrians by

13 improving road geometrics.

14 In addition, the following impacts

15 are anticipated with the construction of specific

16 segments.

17 With selection of W-2:

18 An increase in traffic volumes on

19 Waikoloa Road.

20 With selection of PTA-1 or PTA-3:

21 One, a gain of nearly 5,000 acres

22 of bird hunting land at Pu'u Mali.

23 Two, increased safety by minimizing

24 conflicts between the traveling public and

25 military training activities in the Pohakuloa

1 Training Area.

2 And, three, improved quality of

3 military training activities with the realignment

4 of Saddle Road to the northern boundary of the

5 Pohakuloa Training Area.

6 With selection of EX-4A:

7 One, an increase in traffic volume

8 and associated noise levels in Upper Kaumana.

9 And, two, potential need to

10 relocate some residences along the existing Saddle

11 Road.

12 The major components of

13 socioeconomic mitigation for all action

14 alternatives are as follows:

15 One, construction provisions will

16 be made to avoid impacting activities that

17 generate significant cross-island traffic, such as

18 the Waiki'i Music Festival and the Saddle Road

19 Highway Relay. Access to existing driveways and

20 roads will be maintained throughout construction,

21 And two, hunters will be actively

22 consulted in management of critical habitat

23 replacement lands, particularly for activities

24 related to feral animals. Special management of

25 the Ka'ohe Lease Lands will be undertaken to

1 promote game bird habitat.

2 Other key environmental impacts  
3 anticipated with the implementation of Saddle Road  
4 improvements include:

5 One, a temporary effect on surface  
6 water quality, particularly an increase in  
7 suspended sediments during and shortly after  
8 rainfall events during construction.

9 Two, a temporary and localized  
10 increase in particulates and dust during  
11 construction. However, air quality standards will  
12 not be exceeded.

13 Three, potential impact to historic  
14 archeological sites such as temporary cave  
15 shelters, lava walls for livestock containment,  
16 wagon roads, and built-up livestock trails.

17 Four, potential negative impact on  
18 visual quality and visual character of the Saddle  
19 area.

20 And, five, potential impacts to  
21 caves and lava tubes.

22 Other mitigation measures proposed  
23 to minimize project impacts include the following:

24 One, erosion control measures will  
25 be implemented, and construction areas will be

1 watered for dust control during the construction.

2 Two, the selected road alignment  
3 will be modified in the area of historic

4 archeological sites to avoid or minimize impact to  
5 these features. Documentation and data recovery  
6 will be completed on some relatively small

7 segments that would be impacted. Some sites will  
8 be monitored during construction to ensure that  
9 impacts are restricted to an absolute minimum.

10 Traffic pullout and interpretive signing will be  
11 developed for some sites.

12 Three, roadside treatments will  
13 incorporate erosion control measures and  
14 excavation techniques to create a more natural  
15 appearance following construction. Scenic  
16 pullouts will be provided in several locations.

17 Four, proper cultural protocol will  
18 be undertaken by a native Hawaiian who follows the  
19 way of the Old Culture to release and sanctify the  
20 construction project.

21 Five, construction workers will  
22 complete environmental awareness training.

23 And, six, a field review will be  
24 conducted prior to construction to determine the  
25 probability of caves and lava tubes within the

1 construction corridor. Construction techniques  
2 will be developed to avoid or minimize these  
3 impacts.

4 The potential impacts and benefits  
5 of the No Action Alternative which would keep  
6 Saddle Road as it is today were also considered as  
7 part of the environmental impact statement  
8 process.

9 The No Action Alternative would not  
10 enhance safety, would not eliminate roadway  
11 deficiencies, nor improve level of service, would  
12 not improve operational function, would not  
13 accommodate future traffic levels, would not  
14 reduce or eliminate conflicts between motorists  
15 and military operations, and would not require the  
16 expenditure of about \$200 million. It would not  
17 result in new impacts to the environment as  
18 anticipated with the action alternatives, nor  
19 would it enhance the socioeconomic relationship  
20 between East and West Hawaii.

21 This concludes our brief overview  
22 of the more notable impacts and mitigation  
23 commitments associated with the Saddle Road  
24 improvement project. Please feel free to ask  
25 project representatives at the exhibit stations

1 during the recess for more detailed information or  
2 to answer any questions you may now have. Mahalo.

3 MR. MOORE: Before we take our  
4 anxiously awaited recess, I would like to remind  
5 you that you may present a verbal statement to the  
6 Recorder for inclusion in the official transcript  
7 of the hearing, or you may wait for the oral  
8 testimony portion of today's hearing. In either  
9 case, your statement will be part of the official  
10 record of this hearing.

11 During the recess you may also fill  
12 out a question card at the exhibit stations and  
13 return them to the registration table to indicate  
14 by your name that you wish to testify.

15 The exhibit stations are outside  
16 the door. The biological station will be manned  
17 by Reggie David and Grant Gerris. So if you have  
18 questions about flora, fauna, endangered species,  
19 wetlands, or environmental mitigation, they are  
20 the people to see.

21 Tom Wolforth will be manning the  
22 cultural resources. That is down the hall a  
23 little ways. So if you have any archeological,  
24 historical, or cultural properties question.

25 The socioeconomic table is manned

1 By Ron Terry. If you have questions on the human  
2 impact, social, economic, hunting, noise impacts,  
3 Ron will deal with those. He is just outside the  
4 door to the left.

5 Engineering and Rights-Of-Way will  
6 be manned by Nancy Burns and Jay Uyeda. Mike Lee  
7 from the Department of Transportation  
8 Rights-Of-Way branch will also be there if you  
9 have any questions about the road design or  
10 relocation impacts.

11 At this time I would like to remind  
12 you that we will be taking a recess for about  
13 forty minutes, and we will reconvene after that  
14 for the public testimony portion.

15 (Whereupon, a recess was taken.)

16 (Whereupon, oral testimony was delivered  
17 to the Recorder follows.)

18 TONY HANLEY: My name is Tony  
19 Hanley, Pier 1, Hilo, Hawaii 96720, president of  
20 the Big Island Business Council.

21 We have reviewed the executive  
22 summary of the Draft EIS, and it is our belief  
23 that the document addresses all possible community  
24 concerns and technical information. We believe  
25 the findings and mitigation plans of the Draft EIS

1 address the critical issues involved with this  
2 proposed project and provide a tool to move  
3 forward. Thank you for the opportunity to  
4 testify.

5 I also am president of the Hawaii  
6 Island Portuguese Chamber of Commerce and support  
7 the Draft EIS as previously stated under the BIBC.  
8 There is written testimony that has been submitted  
9 from both organizations. Thank you.

10 EILEEN MCKYTON: I am Eileen  
11 MCKYTON, 3008 Kaumana Drive, P.O. Box 1760, Hilo,  
12 Hawaii 96721. I want you to do something. I  
13 don't care which alternative. I prefer E-3,  
14 PTA-1; and W-3.

15 ALEXANDER MCKYTON: Alexander  
16 MCKYTON, 3008 Kaumana Drive, P.O. Box 1760, Hilo,  
17 Hawaii 96721, 7 mile marker on the existing Saddle  
18 Road. I have no problem with any of the plans.  
19 E-3 would be nice. PTA-1, W-3 would be fine.

20 Something has to be done with the road. We do use  
21 it a lot, and it is very dangerous.

22 BILL MILLER: Bill Miller,  
23 Kurtistown, Hawaii 96760.

24 The Saddle Road project. The  
25 Saddle Road should be improved but with the least

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31  
1 cost, both financially and environmentally. The  
2 biggest problem I have with the project is in  
3 section 2, specifically the first section of  
4 PTA-1.  
5  
6 This part of the road makes no  
7 sense financially and will add at least \$30 million  
8 to the cost of the project due to the mitigation  
9 necessary because of the loss of the critical  
10 habitat to the Palila. The loss of this habitat  
11 is an environmental embarrassment.  
12  
13 The mitigation proposed is  
14 extensive over 9,000 acres. But none the proposed  
15 mitigation is a critical habitat and lack the  
16 extensive elevational distribution of mamane  
17 forest that is described on page 21, paragraph 2  
18 in the Draft EIS, thus making this a biological  
19 gamble at best.  
20  
21 This seems to be a land grab by the  
22 Fish and Wildlife. As a hunter I am very  
23 concerned by the impact direct and indirect on  
24 hunting areas; directly, the loss of PTA areas 1,  
25 2, 3, and 4 or more commonly known as Trail 1.  
26  
27 This area is important for at least  
28 four reasons. One, because its proximity to the  
29 Mauna Kea State Park offers a unique hunting

32  
1 opportunity, family outings utilizing the cabins  
2 and open areas of the park are possible.  
3  
4 Two, it is one of the few areas  
5 that is accessible to people without four-wheel  
6 drive vehicles.  
7  
8 Three, the terrain allows the young  
9 and old hunter alike the opportunity to safely  
10 hunt. The walking is much easier than in most  
11 other hunting areas.  
12  
13 Four, This area has a historical  
14 past. This area is where many first learned to  
15 hunt and is one of the few areas where three  
16 generations can hunt and hunt safely. Ask any  
17 oldtime hunter and they will be sure to have many  
18 Trail 1 stories to tell you.  
19  
20 As I a nondirect impact, the Ka'Ohe  
21 Lease areas, better known to the hunters as Lau's  
22 ranch, may be lost. This is a prime bird hunting  
23 area, being the premier public pheasant hunting  
24 area with the advantage of easy walking for the  
25 young and old.  
26  
27 The proposed plan is not good for  
28 the hunters because hunting access is sure to be  
29 denied in the future. By removing all feral  
30 ungulates, the grasses will grow and grow high

1 enough to be a fire hazard. And as it is  
 2 proposed, the Oversight Committee will have the  
 3 right to close the area if a hire hazard exists.  
 4 Furthermore, if all cattle are  
 5 removed, the dung beetle, a favorite food of the  
 6 pheasant, will disappear. This will hurt the  
 7 pheasant population severely.

8 I believe that the first section of  
 9 PTA-1 or PTA-3 should not be considered, that EX-2  
 10 is the-only acceptable route. And that if the  
 11 road must go through the critical habitat area  
 12 that mitigation for the loss to the hunters be  
 13 direct and in the form of some additional lands  
 14 that access to will be within reason, because the  
 15 lands that are proposed on the back side of Mauna  
 16 Kea will be very difficult to get to and that  
 17 access be guaranteed. Thank you.

18 MARK RODRIGUES: Mark Rodrigues.  
 19 165 Puhilli Street, Hilo, Hawaii 96720. Everything  
 20 that's been addressed for preservation of hunting  
 21 areas seems to be only aimed at bird hunting. And  
 22 I think some of it should be addressed to the  
 23 preservation of ungulate hunting in some of these  
 24 areas and to have an ironclad sort of commitment  
 25 that that will be addressed so there is no loss to

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1 that since there has been so much loss already in  
 2 the past several years to the hunting of  
 3 ungulates. That's about it. Thank you.

4 (Whereupon, the public hearing  
 5 reconvened.)

6 MR. MOORE: I am going to try to  
 7 stay on track. We said forty minutes, and it's  
 8 been exactly forty minutes now. So people will be  
 9 wandering in, but I will begin the public  
 10 testimony portion of the hearing this morning.

11 Again, if everyone can return to  
 12 your seats, and we will begin the public testimony  
 13 portion. I would like to go over the ground rules  
 14 of this hearing one more time before we begin  
 15 taking public testimony.

16 Again, speakers will be taken in  
 17 the order that they signed up at the registration  
 18 desk. And only those signed up to testify will be  
 19 called. And I do remind you that you may sign up  
 20 to testify at any time during the testimony  
 21 portion of this hearing.

22 Speakers will be limited to three  
 23 minutes to ensure everyone has an opportunity to  
 24 testify. We have over twenty people that have  
 25 signed up. So I will be enforcing the three

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1 minute time limit fairly strictly.

2 Again, please speak clearly into  
3 the microphone. The testimony will not be taken  
4 from the floor. These proceedings are being  
5 recorded, again, and a verbatim transcript will be  
6 prepared. So, accordingly, it's important that  
7 the reporter hear and understand what you are  
8 saying. We are going to ask you to use this  
9 microphone to speak with so the Court Reporter can  
10 see your lips and your mouth as you are talking to  
11 get a better record of what is going on.

12 Please be brief and factual in your  
13 statements, and please stick to the subject  
14 matter, and be courteous to each other and respect  
15 each other's opinion. Remember this is not a  
16 debate or referendum on the Saddle Road.

17 I would like to begin the testimony  
18 by calling up the first person who signed up,  
19 Donald Medeiros. Please step up to the  
20 microphone. Please state your name and place of  
21 residence. And affiliation is optional.

22 DONALD MEDEIROS: Aloha. I am  
23 Donald Medeiros, a lifetime resident of Hilo,  
24 Hawaii. And I represent the Hawaii operating  
25 Engineers Industry Stabilization Fund. We are a

1 joint labor and management organization that  
2 represents approximately 3,000 union members and  
3 300 employers.

4 We come before you this morning in  
5 support of the Saddle Road project. These  
6 improvements are a needed necessity in that it  
7 will allow us to safely travel from Hilo to Kona,  
8 especially during stormy weather.

9 It will also improve the flow of  
10 traffic by providing us with a shortcut that will  
11 make travel from one side of the island to the  
12 other more viable.

13 We, the construction industry, have  
14 built the airports, water and sewer lines, the  
15 roads and highways, and all of the rest of the  
16 infrastructure which makes our state one of the  
17 finest places in the world to live and raise  
18 children.

19 We, the workers, that have built  
20 these are now without jobs. We too need to work  
21 and provide for our families.

22 We want to work. We do not want  
23 welfare. This project as a whole is good for the  
24 entire island of Hawaii. We want to have safe  
25 roads, and we need jobs. So I ask everyone here

1 today to support the Saddle Road project. Thank  
2 you.

3 MR. MOORE: Thank you, Donald. I  
4 would like to call Ken Kiyosaki.

5 KEN KIYOSAKI: My name is Ken  
6 Kiyosaki, and I reside in Hilo, Hawaii. I am  
7 speaking today as the president of the Hawaii  
8 Island Contractor's Association and as a member of  
9 our Big Island community.

10 In my role as president of the  
11 Contractors' Association, I represent the voice of  
12 over 260 members who are large and small  
13 businesses involved in construction-related  
14 activities.

15 I am here to speak in favor of the  
16 proposed Saddle Road project. Our island has an  
17 abundance of natural resources and is rich in  
18 potential, but we are facing a critical crossroads  
19 in our economic future.

20 Businesses want to invest in our  
21 community. But without improved infrastructure  
22 and a better business climate, future job  
23 opportunities for our children bleak.

24 We all know that the construction  
25 industry is struggling. The building of this

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1 project together with the increased cross-island  
2 traffic will allow businesses to expand their  
3 market base and become more secure and viable.

4 As a member of our Big Island  
5 community, I often drive the existing Saddle Road  
6 to commute between the east and west side of our  
7 island. I strongly believe that the existing road  
8 is unsafe and a liability to everyone.

9 As a father I would hope that my  
10 children never have to drive it.

11 I feel that the Draft EIS addresses  
12 the key impacts, possible mitigation techniques,  
13 and alternatives to this project, and is sensitive  
14 to our unique indigenous environment.

15 I also believe that while it's  
16 important to preserve biological and historical  
17 resources, we need to balance our preservation  
18 measures with the needs of our human resources.

19 I hope that this project will go  
20 forward and take our island another step closer to  
21 a healthy economic future.

22 Thank you for the opportunity to  
23 testify on behalf of the contractors on this  
24 island and, more importantly, as a parent who has  
25 a very big stake in the future of our island.

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1 Thank you.

2 MR. MOORE: Thank you, Ken. At  
3 this time I would like to call Rodney Rezendes.

4 RODNEY REZENTES: Hello. I am  
5 Rodney Rezendes. I reside in Hilo, Hawaii. I am  
6 an equipment operator, operating engineers. And  
7 the reason why I would like to speak on behalf of  
8 this project is it's good for the economy, it's  
9 good for transportation between the east and west  
10 side of Hawaii, and it will make this road a lot  
11 more accessible for us to travel on, and it will  
12 open up more jobs to everyone in Hawaii. Thank  
13 you.

14 MR. MOORE: Thank you, Rodney.  
15 Next is Hugh Willocks.

16 HUGH WILLOCKS: My name is Hugh  
17 Willocks. I am here today representing myself as  
18 an individual. I am a general contractor. And I  
19 am also a hunter.

20 I would like to say first and  
21 foremost that I am very much in favor of this  
22 project. However, like in all good projects, the  
23 devil is usually in the details. And I would like  
24 to my three minutes to discuss the area that I'm  
25 concerned about. And that is the area within PTA

1 where you have a realignment through the Palila  
2 habitat area.

3 As it appears right now, you would  
4 give the army about 115 acres and then get a  
5 mitigation package which includes a whole area  
6 behind the back side of the mountain, which is  
7 currently in cattle leases. And that would be  
8 taken over by the State and, presumably, turned  
9 into a Palila habitat over a period of years.

10 My current thinking is that based  
11 on the history of the DLNR and some of the State  
12 agencies that do this kind of thing, I am very  
13 uncomfortable with the idea that they would  
14 actually complete that project.

15 And as pacification to the hunters,  
16 we presumably would get to hunt in that area. But  
17 also I notice a lot of caveats in the mitigation  
18 package indicating that if it becomes a conflict  
19 between hunters and the Palila bird or hunters and  
20 a fire hazard, things of that nature, suddenly we  
21 would lose this 9,000 acres.

22 I don't know whether the gentlemen  
23 who have the leases in those 9,000 acres are here  
24 today. But I think they would also have a  
25 problem.

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The project itself, I am very much for. But I do have a real problem with this particular alignment, PTA-1, as opposed to the existing alignment. It would seem to me that we could use the existing alignment and eliminate that mitigation package and have a real good project. Thank you.

MR. MOORE: Thank you. Next is Jeff Melrose.

JEFFREY MELROSE: My name is Jeffrey Melrose. I am testifying on behalf of the Hawaii Island Chamber of Commerce. The Hawaii Inland Chamber is an organization of about 400 members of businesses on this side of the island, and we have a number of statewide members, as well.

The Chamber of Commerce supports the proposed Saddle Road improvements, reviewed portions of the EIS, and has had several opportunities hear presentations by members of the project team. We believe that the major issues associated with the road have been addressed in the report and have been fully discussed in a wide range of public meetings and at advisory group meetings.

Public communications efforts

during the development of this EIS have been far more than adequate. And we congratulate the project team for their work on a complex and important endeavor.

Our support of the Saddle Road improvement is based on several issues relating to the significant economic impact on the island of Hawaii and on the state as a whole.

The first comment is related to the Pohakuloa Training Area. The proposed improvements will provide a major service ongoing military operation of PTA.

Relocation of the road along the PTA-1 alignment will remove civilian traffic from an active training area and allow for more efficient use of the existing alignment for military activities.

There are significant public safety issues associated with live fire exercises and overlapping with public use of the current roadway. The mix of military and civilian traffic within the training area is also an issue of ongoing concern.

We believe that the long-term

1 stability of PTA as a training center for the  
 2 Pacific-based armed forces is an essential factor  
 3 both to our national security and to the economic  
 4 contributions the military operations make to this  
 5 state.

6           Alternative PTA-1 will help to  
 7 resolve public safety issues associated with the  
 8 military use of the road and will address  
 9 significant impediments to the long-term stability  
 10 of the military's contribution to this community.

11           Or second comment relates to  
 12 cross-island commerce. Saddle Road provides an  
 13 important alternative link between east and west  
 14 Hawaii. In this growing community, this island  
 15 has increasing need to commute and commerce from  
 16 one side of the island to the other. The proposed  
 17 improvements will have a significant impact on the  
 18 speed and safety of the cross-island connection.

19           Currently the Hawaii Belt Highway  
 20 along the Hamakua Coast is the most efficient link  
 21 between east and west. Narrow bridges and rugged  
 22 terrain render the Hamakua route an expensive  
 23 alternative to expand. The cost of constructing  
 24 additional traffic lanes along the Hamakua Coast  
 25 is prohibitive. This provides strong economic

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1 justification for the Saddle Road improvements.

2           The third comment is in support of  
 3 the astronomical and atmospheric science that goes  
 4 on in the Saddle and mountain summit areas.

5 Hawaii Island is fortunate to be the host of some  
 6 of the most important astronomic and atmospheric  
 7 research on record. Both the summit of Mauna Kea  
 8 and slopes of Mauna Loa are world-renowned for  
 9 research that is at the forefront of mankind's  
 10 quest to understand our own world and the stellar  
 11 universe in which we live.

12           MR. MOORE: Excuse me, please wrap  
 13 up.

14           JEFFREY MELROSE: One other  
 15 comment. So we do support that as an issue for  
 16 the support of our science functions.

17           I want to make a couple quick  
 18 comments on alternative routes. We have made --  
 19 are interested in PTA-1 and in support for  
 20 providing the military impacts for this road.  
 21 They will be an important part of paying for this  
 22 function. We think that needs to be taken into  
 23 account.

24           Second, the issue is we would like  
 25 to see W-2 connection which is the connection that

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1 hits the Waikoloa Road. That will be -- it hooks  
2 into immediately into the existing network of  
3 roads.

4 And the other Komohana route, E-3,  
5 it has the least amount of impact on the community  
6 and goes through a variety of kinds of degraded  
7 agricultural property. And I think it will be the  
8 best option in that route.

9 MR. MOORE: Thank you very much. I  
10 would like to call next Kats Yamada.

11 KATS YAMADA: Before I proceed  
12 with my comments, I would like to ask the  
13 coordinators to extend the time within which to  
14 respond to the Draft EIS. Don't respond now. I  
15 don't want you to take up any of my time.

16 The reason is this. For all of  
17 Hilo there were essentially three copies of the  
18 Draft EIS made available to the public. One at  
19 the public works building which you can only sit  
20 down and read there, one at the Department of  
21 Transportation, and one complete set for the rest  
22 of the public at the public library.

23 This is for a \$169 million project  
24 we are talking about that you only made available  
25 one complete set to the public to make comments on.

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274 1 Now, in terms of the EIS, let me  
2 say that my comments are restricted to the area  
3 between Halepohaku Road and Mauna Kea State park.

4 I support EX-2. The gentleman that  
5 prepared the Draft EIS on hunting apparently is  
6 not a hunter. He says there's no significant  
7 impact to hunting. But that's the furthest  
8 thing from the truth. That statement you might  
9 hear from somebody from the Sierra Club. Then  
10 again, too, I think he is a member of the Sierra  
11 Club.

12 You are going to be building up the  
13 traffic from 900 vehicles per day up to 14,000 in  
14 the year 2014 right through one of the best bird  
15 hunting areas and mammal hunting areas in  
16 Pohakuloa. And you are telling me that that paved  
17 roadway will not affect hunting? Bull.

18 MR. MOORE: Excuse me, we asked  
19 that we be courteous and that is part of the  
20 ground rules. I will ask that we enforce that.

21 KATS YAMADA: That's about as  
22 courteous as I can be. I had stronger words for  
23 that.

24 Let me also go on and say this. In  
25 return for the hundred acres that goes through

1 area 1 through 4 in PTA, they are asking for  
2 almost 10,000 acres; Lau's ranch, Kipuka Alala,  
3 and Pu'u Mali.

4 Let me touch on Pu'u Mali first  
5 because that's my favorite area. They say they  
6 want to translocate the Palila there. They  
7 already tried that. Not once. Not twice. Not  
8 three times. Four times. The last one was this  
9 past month. And every single instance they try,  
10 they fail.

11 They've never been able to  
12 translocate the birds in Pu'u Mali. Yet they want  
13 that lower ranch land area below where they tried  
14 to translocate the birds as mitigation for the  
15 Palila.

16 Now they are also asked for Kipuka  
17 Alala. Why Kipuka Alala? That is area 23,  
18 hunting areas. That area is essentially an island  
19 by itself. It doesn't consist of mamane trees.  
20 It's primarily --

21 MR. MOORE: Start wrapping up,  
22 please.

23 KATZ YAMADA: They tried  
24 translocating birds there but they failed. Why  
25 are they taking these lands? The only reason I

1 can think of is the one guy saying, hey, don't  
2 fight it, you guys, look at all the land we are  
3 getting, one official talking to another at the  
4 Department of Fish and Wildlife Service.

5 MR. MOORE: Thank you very much.  
6 Next I would like to call Tom Lodge.

7 THOMAS LODGE: My name is Tom  
8 Lodge. And I am here representing not only myself  
9 today but the Hawaii Hunting Association.

10 I support the Saddle Road project  
11 for all the reasons enumerated by the previous  
12 speakers up here. And I do also echo the thoughts  
13 of people and also Kats Yamada about this area  
14 right here which is EX-2 and PTA-1 and PTA-3.

15 And, also, I want to address a  
16 comment that was made earlier in the presentation.  
17 Part of this mitigation they say would be 5,000  
18 acres that would be improved in Ka'ohe Lease.

19 Right now they eradicated Mauna Kea, and they are  
20 requiring that the State of Hawaii maintain that  
21 eradication. If they have this mitigation, they  
22 will also require the State of Hawaii to maintain  
23 that mitigation. So the State of Hawaii would be  
24 ones responsible for taking care of that area and  
25 improving it. The State can already do that. If

1 they were going to do it, they already would be.  
2 Also, my recommendation is that the  
3 Saddle Road realignment be along EX-2. Any other  
4 route along the eastern side of Mauna Kea State  
5 park will have an adverse effect, as mentioned  
6 earlier, in one of our prime hunting areas.

7 It's one of the few areas where  
8 people off island can go hunting in a  
9 two-wheel-drive vehicle, camp at Mauna Kea State  
10 park, and go bird hunting. It's one of the few  
11 areas where bird hunters, I'm told, can be  
12 successful hunting in an area without dogs.

13 Any other route on the eastern side  
14 of Mauna Kea State Park will also have an adverse  
15 affect, we believe, on the park itself from a  
16 quiet enjoyment point of view. You will have all  
17 this traffic. And if it gets up to the volume we  
18 expect, it will be very noisy. And if you want to  
19 camp out up there or stay up there, it will impact  
20 people who want to be up there.

21 We think EX-2 is the best route,  
22 considering all the other factors, Palila  
23 mitigation. We think that the Fish and Wildlife  
24 Service requirement of 100 to 1, almost 10,000  
25 acres for 100 acres of loss of critical habitat

1 which is currently sterile -- there are no Palila  
2 in the area, and we believe there haven't been any  
3 in there for over thirty years.

4 So they are taking 10,000 acres  
5 from a sterile area, which we don't believe is  
6 necessary at all and kind of ridiculous, for that  
7 matter. There is a mitigation package out there  
8 for the hunters suggesting \$5 million of increased  
9 monies to this project for hunter mitigation.

10 We believe that this may actually  
11 go as high as \$30 million, and it's not necessary.  
12 If you adopt the EX-2 route, there would have to  
13 be no mitigation, and you would probably save the  
14 project \$5 million to \$30 million.

15 Also, EX-2 really does not impact,  
16 from our knowledge, the army's ability to operate  
17 in the area. Now they can only have 500 troops in  
18 the area, 5 to 7 helicopters. There are no  
19 landing pads there. They are in there now. They  
20 find it a very popular area to train. And we  
21 don't think that by having EX --

22 MR. MOORE: Please wrap up.  
23 THOMAS LODGE: -- that this will  
24 change any of their training potential. That's  
25 all I have to say. Thank you.

1 MR. MOORE: Thank you very much. I  
2 appreciate it. Next I would like to call Dexter  
3 Egdamin.

4 DEXTER EGDAMIN: Good morning. My  
5 name is Dexter Egdamin. I am a lifetime resident  
6 of Hilo. I also represent the Hawaii Inland  
7 Archery Club and also One Shot, One Kill.

8 We stand in support of the Saddle  
9 Road realignment, but specifically EX-2. The  
10 reason being, I guess the reason being what the  
11 previous speakers, Kats and Tom Lodge already  
12 stated.

13 If anything should happen as far as  
14 what we are asking for from the hunting  
15 perspective, that mitigation package would be just  
16 thrown out and reevaluated again. There's too  
17 much loss to lose what we know as Trail 1. All  
18 the old timers who hunt know Trail 1.

19 Right now Trail 1 has been listed  
20 to be the most productive game bird area on the  
21 island. And that is because it's so accessible to  
22 everybody. Grandma, grandpa, new hunters,  
23 everybody can go and experience firsthand hunting.  
24 It's not an area that you can really get hurt. It  
25 is an area that has been preserved for I don't

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1 know how many areas. I have known that area since  
2 I was a kid.

3 To lose that area, I can't see  
4 anybody agreeing with that. What's not being said  
5 in this is that this Draft EIS has to work with  
6 what the military has as far as ecosystem  
7 management plan. There's other ongoing factors  
8 that will work together with this EIS, and we need  
9 to review it and get those documents made  
10 available. Thank you.

11 MR. MOORE: Thank you, Dexter.  
12 Next I would like to call Edward Clark.

13 EDWARD CLARK: Good morning. My  
14 name is Edward Clark, and I represent to some  
15 extent the Moku Loa Group of the Sierra Club and  
16 their Conservation Council.

17 I would like to preface some  
18 remarks with stating that alternatives to existing  
19 roadways which address today's realities and not  
20 World War II's imperatives are necessary for our  
21 present consideration.

22 Our technology has changed.  
23 Commerce is no longer conducted as it was fifty  
24 years ago. And yet we are still relying on a  
25 fifty-year-old means of transport for each and

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1 every one of us individually; the automobile.

2 I am concerned, as my members are  
3 concerned, that we are not looking sufficiently  
4 far into the future in terms of our future needs  
5 and our present potential in terms of what kind of  
6 transportation system we can accommodate, not only  
7 with this road but with others in the State.

8 And certainly between the two major  
9 population centers of this island, Kona and Hilo,  
10 we need a first rate corridor which accommodates  
11 not only those who wish to travel by automobile  
12 but possible future rail, presently bicyclists,  
13 equestrians, pedestrians, tourists of all kinds  
14 who wish to be accommodated in our really notably  
15 unique settings.

16 And those who wish to hike, who  
17 wish to camp, those accommodations are not really  
18 existing right now in our present roadway  
19 considerations, nor is it really accessible for  
20 those people who wish to make use of our wonderful  
21 environment.

22 So I would like to see this as a  
23 consideration, that we not only think of this as a  
24 roadway for automobile traffic, but also for all  
25 the possible future transportation needs that we

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1 can accommodate.

2 It would be a very great shame if  
3 as future developments come that we have to take  
4 additional areas in this sensitive environment for  
5 those needs at that time. Thank you.

6 MR. MOORE: Thank you, Ed. Next in  
7 Jeno Enocencio.

8 JENO ENOCENCIO: Thank you. I am  
9 very much for jobs. But I'm also for cultural and  
10 traditional means of using the land, as well.

11 One of the things that I see, okay,  
12 as far as what is going to be happening here, I'm  
13 for the existing Saddle Road the way it is right  
14 now. I'm for repaving certain areas. I am for  
15 making sure that motorists are safe as they  
16 travel, especially through Pohakuloa Training  
17 Area. And, also, getting down towards the west  
18 end of this island.

19 What I see, okay, as far as future,  
20 because of the past regarding the kipukas and the  
21 pu'u section and Kipuka Alala where the major  
22 fencing will be taking over, what I see right here  
23 is a joining of the eventual critical habitats, of  
24 fences meeting up with each other, and eventually  
25 taking away more and more hunting areas.

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1 I see eventually fences coming up  
2 all along the southern part of Saddle Road and  
3 eventually meeting up with the proposed fencing  
4 areas of the critical habitat. That's what I see.  
5 I also see Hawaiians, nonHawaiians,  
6 hunters, nonhunters, not being able to get into  
7 the upper Waiakea forest to be able to use it for  
8 traditional hunting and gathering purposes.

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9 I also see with the influx of this  
10 proposal of people from the west side, the rich,  
11 encroaching upon the poor on the east side of the  
12 island, raising taxes. Your taxes will definitely  
13 increase once this road is made possible for the  
14 westerners to come on to the other side.

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15 That's what's going to happen. And  
16 that will change a lot of local people who love  
17 this island on this side who try not to go on the  
18 west side that will eventually move out because  
19 they won't be able to afford their taxes. This is  
20 what I see.

21 I've seen it through the camera,  
22 the eyes of the camera, many times coming to these  
23 various meetings. And I see it happening where  
24 all these fences are eventually going to meet  
25 together, locking you and us and everybody out.

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1 MR. MOORE: Thank you. Next I  
2 would like to call Dr. Harvey Chan.

3 HARVEY CHAN: I am Harvey Chan. I  
4 represent myself and the other citizens of this  
5 country. I also represent my children, my  
6 grandchildren, and their children.

7 What I see here is -- I am all for  
8 development. Our kids need jobs, and we need  
9 jobs. But I'm also aware that the quality of life  
10 is very important to become more and more aware  
11 of. Part of that quality is environment. The  
12 other part of that quality, to me, has been  
13 hunting.

14 I am training my kids in Trail 1.  
15 Yes, Dexter's right. This season showed it. That  
16 area is so full of birds -- there are still birds  
17 up there. And when the environmentalist that  
18 works for your staff said that that was no impact,  
19 he lied. There has been a lot of lies today. We  
20 won't get into -- I am supposed to be very  
21 courteous -- the lie on TV that you said you  
22 notified everybody about these plans, it has been  
23 one big secret. We know that. Be honest. Be  
24 honest with us, and we will accept you.

25 The gentleman out there, he

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1 answered many of my questions. He was nice, okay.  
2 We will respect you if you are honest. But if you  
3 start trying to tell us you your not poaching when  
4 you are poaching, that kind of B.S., we have seen  
5 it in the newspapers. Be honest with us, and we  
6 will respect you. But if you start pulling this  
7 B.S., we won't respect you.

8 Don't realign this road through  
9 that. You are trading a known Palila habitat for  
10 areas that are expected to be -- I'm a scientist.  
11 That expectation is years away. You have no  
12 proof. Where is the proof that the expectation --  
13 what are the chances that it will be fulfilled?

14 What you are saying is you are  
15 trading Palila birds, your environment. Why?  
16 Just so you can have a few more acres to throw a  
17 few more shells out. The army isn't supposed to  
18 be in areas 1 through 4. They are only using area  
19 3 right now. Why? Look at the signs. They  
20 posted it themselves. Habitat. So why do you  
21 want to give it to them now?

22 There are plants in there -- you  
23 talk about the Palila bird. There are endangered  
24 species of plants in that area. But you didn't  
25 talk about it. If you don't tell the whole truth,

1 then it's lies. That's all I have to say. Thank  
2 you.

3 MR. MOORE: Thank you for your  
4 comments. Next I would like to call Nelson Ho-

5 NELSON HO: The Sierra Club will  
6 be submitting written comments more fully later  
7 on. But just gathering information from today, we  
8 have concerns about the impacts to the critical  
9 habitat of the Palila. We would like to know more  
10 about the mitigation package and how it will be  
11 put into the record of decision. And we think  
12 that is as important to the success of any  
13 mitigation effort.

14 We do feel that just saying that  
15 there's only going to be a hundred acres of impact  
16 in the critical habitat is erroneous, because the  
17 impacts spill over beyond just a hundred acres of  
18 roadway. And that the mitigation -- or that the  
19 discussion should reflect the larger impacts, not  
20 just the area covered by pavement.

21 We are concerned about the  
22 long-term commitments to weed management and fire  
23 management. We also are very uncomfortable with  
24 DLNR's track record on commitments to management.  
25 And so we have concerns there, as well.

The last thing I would want to say is that we feel that there may be hunting impacts more than just to the birds. And we would like to see the mitigation for mammal hunting taken into consideration, as well. Thank you.

MR. MOORE: Thank you, Nelson. I would like to call Steven Araujo.

STEVEN ARAUJO: Good morning. I am Stephen Araujo, and I have been a resident of Hawaii since I was born. And I am vice president of the Wildlife Conservation Association of Hawaii which presently we are greater than 800 members at this present time.

I would like to support the safety and economic benefits and also the business end of the Saddle Road realignment. But I would like to support in the PTA area EX-2. There are several reasons for that, the greatest being the mitigation package that was sent in by the U.S. Fish and Wildlife Service which is a ten to one ratio in land area.

There are several things that I would like to comment on. Back in 1980, for example, this area, area 1, was deemed critical habitat for the Palila bird. All sheep -- were

eradicated from that area also from the rest of the mountain, yeah. I heard two Sierra Club representatives speaking today. I didn't hear any one of them say that this is critical Palila habitat, this area should not be dozed. And the suit back in 1981 was filed by the Sierra Club and also the Audubon Society against the State of Hawaii.

Also, I was one of the hunters that attended a special mitigation meeting provided by the U.S. Fish and Wildlife Service. To answer Kats' question which he asked earlier about the land area in Kipuka Alala, it was stated by one of the researchers in the DRS that Kipuka Alala is not an essential habitat for the Palila bird. It is political. So we will take it anyway.

And also the reason for the back section of the ranches to be given over to the Palila bird is because -- this is being in reference to what Nelson asked -- the off-road impact. According to that same researcher, the impact would go like from -- if the PTA-1 was used, it would go about a mile and a half up the mountain. That is a great impact. That's why the ranch section would be put into Palila habitat.

1 And also Lau's ranch would be put into habitat.

2 On the part of this mitigation  
3 plan, I was wondering if any consideration would  
4 be given to the ranchers, if this land were to be  
5 taken out of their lease, would those ranchers be  
6 compensated for their loss of profit in their  
7 land?

8 MR. MOORE: I need to ask you to  
9 start wrapping up, please.

10 STEVEN ARAUJO: Also, if this  
11 mitigation package does go through, according to  
12 what we understand, that that section of Mauna Kea  
13 would no longer be essential habitat for the  
14 Palila bird. It should be turned back to sheep  
15 country if that impact is that great. Thank you.

16 MR. MOORE: Thank you, Steven. I  
17 appreciate it. Next I would like to call Dante  
18 Carpenter.

19 DANTE CARPENTER: Good afternoon.  
20 I am Dante Carpenter. I am a director of Pacific  
21 Waste Company, Inc., a waste disposal company with  
22 operations in Hilo and Kawaihae, serving the  
23 island of Hawaii.

24 Let me state at the outset that  
25 neither General Bagnal, then commander of the

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1 USARPAC, nor I, in a prior role as Mayor of the  
2 County of Hawaii in 1985 ever imagined that the  
3 Big Island's Saddle Road project would be listed  
4 on the worldwide web at [www.saddleroad.com](http://www.saddleroad.com).

5 Indeed, I never even knew what the  
6 world wide web was or that I could download  
7 several issues of newsletters promulgated by a  
8 Citizen's Saddle Road Task Force formed in 1993 by  
9 Senator Inouye, and further print out a 34-page  
10 executive summary document describing in clear  
11 terms the project under discussion today. I want  
12 to state that I appreciate the openness of these  
13 proceedings.

14 Our mutual pledge then was to  
15 immediately attempt to stop the loss of both  
16 civilian and military lives, as well as injuries  
17 and equipment damaged due to extreme conditions on  
18 the Saddle Road, by implementing safety  
19 improvements while planning a long term solution  
20 for the mutual development and benefit of this  
21 vital roadway across the island.

22 I personally want to thank the good  
23 General for following up over these past 13 years  
24 with succeeding USARPAC commands to its present  
25 commander LTG Steele so that this project can

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indeed be accomplished in our lifetime. It will no doubt increase the mobility of Hawaii's people as well as benefit user resident communities, including scientists, island commuters, hunters, cultural gatherings, military, commercial, and visitors alike.

I know I was quite perturbed when the first approvals by the state land board were given for the county's early improvements in '86 and '87 from the 9 to 19 mileposts. They called for very strict working boundaries within limited and narrow rights-of-ways so as not to invite alien species of flora and fauna, et cetera. That slowed the work processes because it limited the ability of heavy equipment to maneuver in tight places. But I now have a greater appreciation for the sensitivity of the Saddle Road area as it relates to native habitat, for creatures large and small, such as snails, insect species, as well as endangered endemic bird species.

The DEIS identifies important environmental, biological, social, economic concerns, among others, and summarizes the impacts as they relate to the various segments proposed for improvement. Actions to mitigate concerns

229 1 appear to resolve to my satisfaction most, if not  
2 all, potential conflicts.

38 3 Therefore, in the interests of  
113 4 separation from military activity, environment,  
1 5 and cost effectiveness for the distances involved,  
6 I would recommend W-2 in section I, PTA-1 in  
36 7 section II, EX-3 in section III, and a  
217 8 reexamination of section IV to allow for an E-3  
9 segment to tie into the original proposed  
10 cross-island extension of Puninako Avenue at the  
11 Kaahumanu Highway junction mauka of the city of  
12 Hilo.

13 MR. MOORE: Please start wrapping  
14 up.

15 Further, may I strongly suggest  
55 16 that in conjunction with the road improvements,  
17 there are installed adequate roadside turnouts for  
18 viewpoints, rest stops, cultural gathering, hunter  
19 stations, et cetera.

56 20 Moreover, in consideration of the  
21 long-term future, that potential high speed  
22 transit corridors be identified from east to west  
23 and north to south to augment existing as well as  
24 future road alignments in conjunction with the  
25 cross-island arterial Saddle Road.

1 Please also see that there is  
2 access to the national oceanographic and  
3 atmospheric agency station at the 11,000 feet  
4 level on the north face of Mauna Loa.

5 May I again express a sincere  
6 mahalo to the many agencies of Federal, State, and  
7 County governments, as well as community advisors  
8 who are participating in this much needed project.

9 Moreover, Rust Environment and  
10 Infrastructure Company should be commended for  
11 developing a comprehensive set of route location  
12 design studies necessary for the project as well  
13 as selecting Okahara & Associates, a competent  
14 local Hilo-based firm, for all project  
15 coordination in Hawaii.

16 Needless to say, Pacific Waste,  
17 Inc. looks forward to utilization of the improved  
18 Saddle Road as an integral part of its operations  
19 in hauling disposable wastes to the land fill site  
20 in west Hawaii. We strongly support this project.  
21 Mahalo a nui loa for your consideration.

22 MR. MOORE: I would like to call  
23 Ronald Bachman next.

24 RONALD BACHMAN: Ron Bachman. I  
25 represent myself. I have submitted written

1 testimony I gave earlier. I want to summarize my  
2 testimony and do it quickly.

3 I want to talk about section 2. I  
4 have one statement to make. Stay out of Trail 1.  
5 Don't meddle in areas 1, 2, 3, and 4. The cost is  
6 just too much. The mitigation is something that  
7 we are not even sure about. We don't know if this  
8 work. The areas are not ready for introduction of  
9 Palila, like was said in the statement.

10 It will cost so darn much that it  
11 might discourage the whole Saddle Road project,  
12 and we don't want to see this. I am in favor of  
13 the Saddle Road project. But I think that a lot  
14 of this mitigation is overemphasized.

15 There are so many problems in  
16 getting into Trail 1. The fire hazard is  
17 something that will affect the whole of Mauna Kea.  
18 We have a very serious and a new fuel problem with  
19 mountain grass. Once this stuff catches fire, it  
20 holds the heat right up against the trunks of the  
21 trees until they are dead. Not like years ago  
22 when we didn't have to deal with mountain grass.

23 We'd let the fire rush on through. It probably  
24 had a very positive effect then, but not now.

25 The effect that this is going to

1 have on the mamane forest, sociological  
2 implications of getting it and destroying the  
3 mamane forest or destroying parts of it are very  
4 important to some people.

5 As far as the army's training  
6 scenario, the army has identified a lot of these  
7 areas, areas 1, 2, 3, and 4, as biological  
8 significant areas, BSA, sensitive ecological  
9 areas.

10 In effect, it's going to change a  
11 lot of the training scenario that the army has  
12 been able to employ up until now. As to whether  
13 they will be able to use this to the extent that  
14 we see written in the statements that their  
15 desires are to increase the training, I really  
16 doubt it.

17 But I would like to see in the next  
18 draft something -- not a draft, the real one --  
19 where we can do something to accommodate the  
20 army's training, particularly artillery, so we  
21 wouldn't have the fire cross the road. And more  
22 emphasis up on the east side of the army training  
23 area, which they are not using too much right now.

24 Fire hazard, trees -- I think I  
25 pretty much covered it. Thank you.

1 MR. MOORE: Thank you, Ron. I  
2 appreciate it. I would like to call Masa Takaki.

3 MASA TAKAKI: My name is Masa  
4 Takaki, from Papaikou. And I represent the Big  
5 Island Fish and Game Association with 176 members.  
6 I too am in favor -- we too are in favor of the  
7 improvement of Saddle Road. But we like to take  
8 it onto the extension too, which is the road  
9 that's the existing highway, for the same purpose  
10 which was just mentioned.

11 Another thing too. On the slope of  
12 Mauna Kea, this is a holy place. You have a  
13 mamane forest. Not only mamane forest, kiawe  
14 trees. Nowhere else in Pohakuloa have  
15 concentration like this. We are really against  
16 taking this away.

17 Another thing too. This area is  
18 for people like me who have heart conditions and  
19 disabled elderly who cannot cherish Mauna Kea.  
20 And this is a spot we can hunt. There are no  
21 other areas. Other areas are full of stones and  
22 rocks. It's good for young guys but not seniors.

23 Another thing I would like to see  
24 is what we discussed, that you have a highway  
25 coming through Pohakuloa which will be improved.





1 because if it's tilted, we will get crooked feet.  
2 So if you can keep it as flat as  
3 possible and encourage that eight-foot, it's very  
4 workable for traffic.

5 On another detail. On the  
6 pullouts, if you could consider telephone,  
7 emergency telephone. Because Saddle Road is quite  
8 isolated. And if you could put in with more  
9 frequent spacing emergency telephones at the  
10 pullouts, that would be real helpful at the time  
11 when I have flat tires.

12 Also, if they could consider the  
13 access openings to the adjacent lands, and I think  
14 that was pointed out, to benefit the hunters as  
15 well as recreationists like myself who try to go  
16 into the boonies and think about things.

17 Accessibility is very important, I  
18 feel. And I really get perturbed when I see  
19 fences come up. Especially living here all of my  
20 life. So try to discourage fences or put them  
21 where only necessary to keep out the bad animals.

22 MR. MOORE: Please start wrapping  
23 up.

24 DENNIS SHIGOKA: The last  
25 technical point I would like to make is that on

293 1 the two side, section 1 and 4, would be all up  
2 hill and that truck climbing lanes be considered  
3 for the design.

4 MR. MOORE: Thank you. Next I  
5 would like to call Nawahine Vincent.

6 NAWAHINE VINCENT: Hello. My  
7 name is Nawahine Vincent. I am here today to talk  
8 about this new plan that they have. Apparently  
9 this plan that they have is gonna involve a lot of  
10 open stores and stuff like that.

11 Because we have a plan like this in  
12 Hawaiian Homes. It's a master plan that they are  
13 planning on building homes up here for the  
14 Hawaiian people. If they are going to build  
15 houses up -- I think it's near this area  
16 (indicating) -- this side. It's near here, they  
17 will put our people. But the thing is that the  
18 climate up here and the climate down this side is  
19 different (indicating). So the old people that is  
20 planning to come up here won't be able to survive  
21 the weather here.

294 22 So that means these new roads is  
23 gonna help develop Mauna Kea. Instead of calling  
24 it Humu'ula and Piionua Master Plan, it should be  
25 Humu'ula and Mauna Kea Master Plan. Because

1 Pihonua is down in this area.

2 So I know the hunting area over  
3 here (indicating) and this area. And I think they  
4 should just leave this road how it is. Because  
5 then you gonna take our hunters all out from down  
6 there, you know. So I feel that you guys should  
7 go from Puainako and come up. That's all I have  
8 to say. Thank you.

9 MR. MOORE: Thank you very much.

10 Next is Hank Roxburgh.

11 HANK ROXBURGH: Good morning,  
12 ladies and gentlemen, concerned people here at  
13 this hearing. My concern is -- I'm in favor for  
14 this project, this highway. The reason for that  
15 being is I'm a construction worker, and I work  
16 with Operating Engineer Local 3.

17 Many times we have jobs on the  
18 other side as well as people on the other side  
19 coming here, commuting back and forth. And it's  
20 really unsafe when you travel 4:00 or 5:00 in the  
21 morning to get to the other side for jobs on time.

22 And my concern is that if we take  
23 the Saddle Road it's so winding over there that we  
24 need improvements for the safety. We also have  
25 Hamakua to travel on. But when you travel 3:00,

1 4:00 in the morning, you meet up with a lot of  
2 slow trucks. And this is what we confront when we  
3 work back and forth on the other side, as well as  
4 this side, those people commuting.

5 I think that as far as this Saddle  
6 Road improvement that they have, it is really a  
7 big thing for the construction workers as well as  
8 the hotel workers, and it would be convenient for  
9 everyone as we live on this island.

10 I don't want to step on anybody's  
11 feet as far as the hunters and the outdoor  
12 circles. They have their rights. But we got to  
13 work together. Many times we have traveled the  
14 Saddle Road, and we run into military convoys and  
15 all that. How many times have we given them the  
16 one finger salute?

17 I mean our relationships should be  
18 good on that. We should work with them as well as  
19 they work with us. And we need them as well as  
20 they need us. So I'm in favor of that in  
21 traveling -- as far as the safety is concerned for  
22 our families, for our family values, for our kids,  
23 our children as they grow, and not wait like  
24 H-3 did forty years from now because most of us  
25 won't be here to enjoy that road.

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1 Hopefully, we can get it done  
2 within the next year. Hopefully. So let's all,  
3 you know, get together, work together, and make  
4 this road a safe road but one that we all can add  
5 our input and be a happy community as well as  
6 happy island. Thank you.

7 MR. MOORE: Thank you very much.  
8 Next is Steve Hurt.

9 STEVE HURT: My name is Steve  
10 Hurt. I am a resident of Keaau. With the current  
11 Draft Environmental Impact Statement for Saddle  
12 Road and Draft Endangered Species Management Plan  
13 for PTA, conflicting reports are coming out, so  
14 it's hard to make a real definite intelligent  
15 decision. I don't think both will be rewritten to  
16 have their facts come straight.

17 With that I would like to say that  
18 we support EX-2 because section 1 through 4 in PTA  
19 has been listed with endangered plants and animals  
20 as far as snails and slugs. We support the EX-3  
21 and the E-3 on the lower side and the W-2 on  
22 section 1.

23 We also recommend that a hunter  
24 representative be set upon the oversight  
25 committee. And we would like to have that decided

1 on a vote from the hunter community.

2 If PTA-1 is selected, the hunter  
3 mitigation package is to remain as stated as the  
4 mammals were not addressed at all in the report.  
5 That's fortunate.

6 The trade-off for a hundred acres  
7 of the road for 9,000 acres is an expensive  
8 proposition. And with the ongoing mitigation  
9 plans for the Palila, \$18 million plus a \$9.9  
10 million hunter mitigation package brings that cost  
11 close to \$30 million in excess costs to go through  
12 PTA-1.

13 In the exchange program where they  
14 are saying that the 9,000 acres of the Pu'u Mali  
15 area is open for bird hunting, that has a  
16 stipulation in there that it's only good for as  
17 long as there's not a fire hazard. Someone needs  
18 to be made responsible, whether it's the State,  
19 the Federal Highway Division or the U.S. Fish and  
20 Wildlife Service, should this portion come down on  
21 the road.

22 And we request that no additional  
23 fencing be put anywhere out of PTA proper, which  
24 means the western and eastern portion of the  
25 highway. Thank you.

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MR. MOORE: Thank you, Steve. Next is Kent Hinde.

KENT HINDES: Hello. My name is Kent Hinde, and I'm an independent management and engineering consultant from Kona.

And I want to State right off the bat that highways in Hawaii are dangerous places to be. And I've been over the Saddle Road many times. And as it exists now, it is also a dangerous place to be. But it is also the only feasible major transportation corridor on this island.

And I feel like for this island to become economically viable, we have to have a major transportation corridor between east and west. And I would like the designers to consider future transportation needs and transportation systems and put in design features that would allow at some point in time in the future some kind of a transportation system, mass transit system, across the island.

As far as the actual alignments go, I favor an E-3 alignment that actually hooks up to Puainako in section 4. EX-3 is pretty much existing. But I am kind of a little different

here. Section 2, I see the EX-2 eastern half where it goes up to Mauna Kea State Park as being the most -- mitigates most impacts. Then PTA-1 from Mauna Kea State Park on out to section 1. And I also favor W-2 with a major interchange at Waikoloa Boulevard.

And I also have some very strong reservations about a hundred to one hunter mitigation package. Thank you.

MR. MOORE: Next is Paula Helfrich.

PAULA HELFRICH: Good morning.

Paula Helfrich. And I am here representing myself. I just want to congratulate everybody that is in the room because there are folks from all walks of life from all areas of the island. It's not just any one location that is coming down. I think it indicates how much we all care about the road and how important it is for the future.

I submitted written testimony. But what I'm hoping we can accomplish as the final EIS and initial construction planning goes forward is that the HDOT, Hawaii Department of Transportation, and the Federal Highways Administration could proceed with whatever

1 alignment is selected as a heritage corridor under  
2 the Scenic Byways Program, making it eligible  
3 hopefully for funding.

4 This would allow for natural area  
5 landscaping, scenic interpretive and educational  
6 and cultural identification plans and signage,  
7 collateral materials so that we can all educate  
8 each other, our visitors, and students on the  
9 beauty of the Saddle area at all levels and also  
10 ensure that people are educated about the dangers  
11 of being off road -- maybe not dangers. But to  
12 ensure they are respectful of all the areas that  
13 they will have the opportunity to see.

14 And, also, it does open up  
15 opportunities within the Hawaiian community  
16 adjacent to where the Hawaiian Homelands will abut  
17 the Saddle Road. So that, you know, this is a  
18 fifty-year, hundred-year-road, so please make it  
19 beautiful. Thank you.

20 MR. MOORE: Thank you, Paula. Our  
21 last speaker who signed up is Michael Lum.

22 MICHAEL LUM: My name is Mike Lum.  
23 I am representing my family and some of my friends  
24 in the neighborhood and community.

25 I have family roots here that go

1 way back. My concerns are for myself, cultural,  
2 social, and economical.

3 I use Trail 1 quite often for  
4 hunting and other reasons. I take my young boy up  
5 there. It's one of the few areas I can take him  
6 and enjoy it. There are many times I can go up  
7 there and not even take a shot. It's just a time  
8 I can spend with my boy. That is something I  
9 can't put a price tag on.

10 As far as the mamane forest and the  
11 Palila birds, they have, as it is now, full range  
12 of the mountain. They live there because they  
13 want to. There's more reasons than just having  
14 mamane forest there that they reside there.

15 There's times when you can go up and you can see  
16 the clouds peel back right up over this area, and  
17 they choose that area for shelter and food and  
18 other resources. And I think it will be real hard  
19 to move them.

20 It looks like a fairly large area.  
21 But Hawaii in itself is just a small spec on the  
22 map. I think we as a people should be responsible  
23 for what we choose for our children and their  
24 children. I think it's awful hard to put a price  
25 tag on our cultural and natural resources. And I

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1 think we should try to preserve what we have.

2 Personally, I see a need for the  
3 road. But I think we should be responsible in how  
4 we choose to use the land that we have.

5 As far as economical concerns,  
6 Senator Dan Inouye has expressed a desire to cut  
7 the project into sizes for which local contractors  
8 can afford to undertake and bond. If you make the  
9 projects too large, we really do ourselves and our  
10 community a disservice by putting it out of our  
11 reach.

12 And as far as construction goes,  
13 there's times when you travel on the road even as  
14 it is, people are driving 55, 60 miles an hour.  
15 There's times when you can't drive over 20 miles  
16 an hour because of the fog.

17 So I think you see pileups and  
18 wrecks as it is going 55 miles an hour. And I  
19 think to leave everybody here, I would like to say  
20 that the military doesn't own this land, and the  
21 State doesn't own the land. It belongs to all of  
22 us and our children. And what we do with this  
23 project will stay for the next hundred years.

24 MR. MOORE: Thank you very much.  
25 This concludes the public testimony portion of

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1 this hearing. I would like to begin the question  
2 and answer session. We have one question so far.  
3 If you have others, this is your last opportunity  
4 to get them in.

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5 The question is, Reggie, is the  
6 proposed realignment going through a mamane forest  
7 and include the habitat and endangered plants?

8 REGGIE DAVID: Basically the reason  
9 that an alignment is being proposed through both  
10 critical habitat and an area that does have  
11 endangered plants in it is that this route best  
12 fulfills the stated purpose and need of the  
13 roadway, which is essentially the separation of  
14 military and civilian traffic, essentially a  
15 safety issue. And, also, so that the military can  
16 improve their training. I am not sure if that's  
17 exactly what was meant by the question.

18 MR. MOORE: I just want you to  
19 point out the critical habitat.

20 REGGIE DAVID: On this map the  
21 area that is brown is the Federally designated  
22 critical habitat for the Palila. And alignment  
23 PTA-1 or PTA-3 would go through a portion of it  
24 down here. And as others have stated today, this  
25 is an area that currently does not have resident

1 Palila.

2 MR. MOORE: Again, that's the only  
3 question, written question we have.

4 This concludes the question and  
5 answer portion of the hearing.

6 I would like to remind you that the  
7 exhibit stations will remain open for as long as  
8 people are interested in asking questions or feel  
9 they can get more information.

10 We thank you very much for your  
11 presence here today and your participation in this  
12 public hearing.

13 Again, we invite you to browse  
14 through the exhibit stations after the close of  
15 the hearing if you have any further questions or  
16 want more information. In order to comment in  
17 writing, remember the written comments will be  
18 accepted until December 22, 1997.

19 It is 11:42 a.m. and I declare this  
20 public hearing to be closed.

21 (Whereupon, the hearing adjourned at  
22 11:42 a.m.)

CERTIFICATE

1 STATE OF HAWAII )  
2 )  
3 ) SS.  
4 COUNTY OF HONOLULU )

5 I, WILLIAM T. BARTON, RPR, Certified  
6 Shorthand Reporter, State of Hawaii, do hereby  
7 certify:

8 That on December 13, 1997 at 9:00 a.m. there  
9 occurred before me the above proceedings contained  
10 herein;

11 That I am neither counsel for any of the  
12 parties herein, nor interested in any way in the  
13 outcome of this hearing;

14 That the statements herein were by me taken  
15 down in machine shorthand and thereafter reduced  
16 to print via computer-aided transcription under my  
17 supervision; that the foregoing represents a  
18 complete and accurate transcript of the above  
19 proceedings to the best of my ability.

20 Dated this 26th day of December 1997, at  
21 Honolulu, Hawaii.

22 *William T. Barton*

23 WILLIAM T. BARTON, CSR No. 391  
24 Certified Shorthand Reporter  
25

**SECTION 3 - AGENCY COMMENTS AND RESPONSES REGARDING  
DEIS**



## SECTION 3 - AGENCY COMMENTS AND RESPONSES REGARDING DEIS

### 3.1 Summary of Agency Comments and Responses

This section of the FEIS summarizes the comments received from Federal, state, and county agencies as a part of the formal comment period for the Saddle Road DEIS (Table 3.1.1, *Numerical Listing of Summary of Agency Comments and Responses*). It summarizes all written correspondence received and assigns each comment a number code for reference. Copies of the letters received are included in the following section (FEIS - Part II, 3.2). Immediately following each comment summary in Table 3.1.1, is the response prepared by the FHWA consultant team. Many responses also refer the reader to those sections of the FEIS where additional information is presented on the issue. Some comments refer the reader to the response to other comment summaries.

Comment summaries and responses are also provided in Section 4.1 for public comments received: written correspondence and hearing testimony. For distinction between the public and agency comments, agency comments were coded with an "A" for agency, or A1, A2, A3, etc. Public comments were coded with a numerical code only, or 1, 2, 3, etc.

Table 3.1.1 is organized into three major sections (Federal Agency Responses, State Agency Responses, and County Agency Responses); the sections are ordered alphabetically by agency name. For clarification, the agency comment summaries in Table 3.1.1 are italicized; the responses to comments are in standard type. The summaries were prepared to represent the intent of the issue and do not necessarily state the agency's comments verbatim.

**TABLE 3.1.1**  
**Numerical Listing of Summary of Agency Comments and Responses**

#### Federal Agency Responses

U.S. Department of Agriculture  
Natural Resources Conservation Service  
Honolulu  
Kenneth M. Kaneshiro, State Conservationist  
2-4-98

*Comment A1: The sections of the road that would be hugged up against the toe of Mauna Kea will be subjected to much greater velocities of runoff from the steep mountainside. The sediment load will be substantially greater than that currently experienced at the existing roadway. This area experiences flash flooding much like the southwestern deserts of the continental United States. The flat between the toe of Mauna Kea and the existing roadway has served as a defacto*

*sediment de-energizer and sediment storage facility. Careful engineering will be needed to pass these sediment and runoff loads safely past the new roadway.*

Response: The bridging structures will be designed to pass the 50 or 100 year storm in the natural channels as much as practical. Sediment loading will be considered during culvert and bridge design. Sediment control structures will be installed where required.

*Comment A2: The placement of the roadway next to the toe of Mauna Kea will reduce the opportunities to control wildfires which will increase in frequency with the expected increase in use of this highway. Wildfire is a major threat to the native plants and animals of the region and the main course of soil erosion on steep leeward slopes. Experience has shown that this south slope of Mauna Kea burns easily and limited access makes controlling fire almost impossible. The present use of barren lands for much of the saddle area roadway and the level and accessible buffer strip between the road and the steep slope have minimized this threat in the past. A good south (Kona) wind will breach the planned curb, access control fence and the paved fire break easily and lift the fire rapidly upslope. In the past, the military had tried to control a wildfire on the south slope and did poorly under favorable conditions of little wind.*

Response: In addition to the proposed paved shoulder, fire break, and extruded curb, the fire mitigation proposed includes funding to hire an experienced high-altitude, xeric plant community fire ecologist, who will be charged with developing a real world fire model(s) consistent with the best known methodology. Since the time of the referenced fire, the Army has upgraded their fire fighting capabilities at the PTA. Key among the improvements completed to date has been the construction of six 80,000 gallon dip tanks and the purchase and deployment of 2 Humvee pumper trucks to the PTA fire department. In addition, the USAG-HI in its PTA Fire Management Plan has agreed to stockpile and maintain the fire fighting equipment necessary to supply a 86-man fire fighting detail.

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U.S. Department of the Army  
Headquarters  
United States Army Garrison, Hawai'i  
Schofield Barracks  
Barry N. Totten, Colonel, U.S. Army  
Director of Public Works  
12-2-97

*Comment A3: The Army's preferred alternative is to relocate Saddle Road to improve traffic safety and minimize conflicts between military traffic crossing the highway and civilian vehicles.*

Response: Chapter 1 of the EIS discusses the purpose and need for the project, which includes the need to separate civilian roadway traffic from military maneuvers to improve safety and to improve the quality of military training operations.

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U.S. Department of the Army  
Military Traffic Management Command  
Transportation Engineering Agency  
Peter M Cline, Senior Engineer for Access Roads  
12-19-97

*Comment A4: Summary of Impacts, Threatened and Endangered Species, DEIS, page S-22, Table S.6, Section II, EX-2 states that there are no direct impacts to the Palila Critical Habitat. Without direct impacts, the mitigation costs on page S-6 should be funded from other than DAR funds.*

Response: While there is no direct take of Palila Critical Habitat with the selection of Segment EX-2, the proximity of the roadway to the core population of Palila and the edge of Critical Habitat increases the risk of fire threat to both from unplanned ignition sources originating from vehicles. The fire break cross-section for EX-2 was deemed essential to the long-term viability of the core population of Palila and its Critical Habitat by the USFWS and the BRD/USGS during informal consultation on alternatives. The mitigation cost of \$5 million shown in the FEIS, Table S.3 *Comparison of Segments*, EX-2, is required for construction of the fire prevention cross-section.

If EX-2 were to be chosen as the recommended alternative, a new BA would need to be prepared and submitted to the USFWS and required mitigation responsibilities determined for this action. The selection of EX-2 as the recommended alternative would only partially fulfill the purpose of the project relating to military training. In light of the total 78-km project, the question whether this partial fulfillment in purpose and need for the PTA would warrant the complete funding of required mitigation by the DOD has not been resolved because PTA-1 was selected as the recommended alternative.

*Comment A5: It would appear that the DAR project would be responsible for replacing an approximate amount and type of property as those disturbed by the DAR project and the restoration and translocation would be funded from other than the DAR project. Management of property acquired for mitigation (off PTA) should not be the responsibility of the DOD.*

Response: The referenced taking of slightly over 100 acres of Palila Critical Habitat would negatively impact the prime, long-term, viability of the entire Pohakuloa Flats for Palila translocation efforts. The Pohakuloa Flats area is considered the most viable, existing, state-owned area for Palila restoration programs.

The size, location, and habitat value of the critical habitat replacement area on the north slope of Mauna Kea has been scientifically evaluated and judged by the USFWS and the BRD/USGS to be an essential replacement to offset the diminishment of the Pohakuloa Flats area as a potentially successful restoration area. It is proposed that the establishment of the replacement lands be funded by the proposed project, and MTMC has allowed that the long-term Palila

translocation, pest/alien species monitoring program, and management of the lands can be funded from the DAR Program should funds be so appropriated.

*Comment A6: If a fire break is required for Segment EX-2, it must be necessary because of the projected increase in non DOD through traffic. EX-2 does not impact Palila Critical Habitat (per page S-22), and DOD reportedly does not project a change from the present amount and type of training to be conducted at PTA. Therefore, the fire break for EX-2 should be more appropriately funded from other than DAR funds.*

Response: Refer to response to Comment A4.

*Comment A7: A map is needed to show Pu'u Mali, the Ka'ohe Leased Lands, and Kipuka 'Alala (Page 3-49, paragraph 5, line 7, DEIS).*

Response: The Pu'u Mali area, Ka'ohe Leased Lands, and Kipuka 'Alala are shown in the FEIS (ref: FEIS - Part III, MOU).

*Comment A8: There is no mention of the source and impact of water to be used during construction.*

Response: The source of water to be used during construction will be the responsibility of the contractor. Several possibilities exist, any combination of which would provide adequate supply without impacting existing needs. Parker Ranch has a water system which is supplied by the Department of Agriculture's Hamakua ditch system. It is possible that some of this water may be available, however, approval is needed from the State. Alternately, County water can be trucked from Waimea or Hilo. There are existing springs on private lands on the east end of the project near MP 8 that may be available. There is also a private water system owned by Waiki'i Ranch, which may have some capacity. Permission is required from the ranch in order to use this source.

*Comment A9: There is no mention of the source and impact of materials to be used during construction.*

Response: The roadway will be designed with balanced earthwork to the extent possible. If the earthwork quantities cannot be balanced, local borrow sites or disposal sites will be identified. FHWA policy within PTA will be for the contractor to provide their own materials source. Contractor is required to follow applicable environmental laws regarding borrow materials in order to prevent introduction of alien species.

*Comment A10: Change the word plant to plan on page 3-179, paragraph 5, line 2.*

Response: Correction made in FEIS.

Comment A11: *A figure is needed to indicate the areas (Pu'u Mali, Ka'ohe Leased Lands (Pu'u La'au?) and Kipuka 'Alala). It does not seem reasonable for the DAR Program to fund for the purchase of 1864 ha (and various other large parcels of land) to replace 41.5 ha or 46 ha of Critical Habitat disturbed for PTA-1 or PTA-3, respectively. This purchased property should be managed by other than DOD. Additionally, the identified property is State property. Is part of the property already identified as Critical Habitat? Commenter questions if it is appropriate for DOD to pay for State leased land (already identified as Critical Habitat), that will remain State property under the control of DOFAW.*

Response: The transecting of a portion of the federally-designated Palila Critical Habitat by the construction of either PTA-1 or PTA-3 will have long-term implications on the recovery efforts for the Palila. Limiting factors which have been identified to date cover an extremely broad spectrum. The most obvious is the diminished and fragmented nature of much of the remaining forest. There is a strong correlation between the density of Palila and the areas with the most extensive elevational distribution of mamane forest. Palila have been shown to exploit this elevational range, moving downslope following the pod production of mamane which also progresses in a like fashion. Mamane is an obligate component in the Palila life cycle. Palila are highly dependent on mamane not only for their principal foods, which are the unripe seeds of this endemic species, but also for the larvae of mamane coddling moth (*Cydia spp.*), an endemic Tortricidae moth found only in mamane. Palila also favor mamane trees over other species such as naio for nesting.

In a letter dated October 12, 1996, the USFWS directed FHWA to fund efforts to enhance habitat and provide for the reintroduction of Palila to two separate sites as well as to enhance the existing core population located in the Pu'u La'au area on Mauna Kea (FEIS, Chapter 9, page 130). The Palila mitigation proposed in the BA is based on this letter and the scientific rationale contained within.

There are no plans for DOD to manage lands in either the Pu'u Mali or Ka'ohe Lease areas.

Of the three parcels of land proposed for Palila management, only the Ka'ohe Lease parcel is within the federally designated Palila Critical Habitat. It is appropriate and common for a Federal project to provide mitigation parcels or assistance at any location, regardless of ownership, to offset project impacts.

Comment A12: *The DAR Program should not fund the reintroduction of the Palila.*

Response: The BA states that the reintroduction of the Palila will be undertaken with other than DAR funds (Rana 1997, Tech. App. Vol. III, and FEIS - Part III, BO and MOU); however, late developments (early 1999) allowed MTMC to concede DAR funds for this use if so appropriated.

Comment A13: *The DAR Program should not fund for three years work of a fire ecologist and should not pay the USFWS 25 percent to supervise the fire ecologist.*

Response: Mitigating the potential increase in the risk of unplanned wildfires requires that a comprehensive fire plan be developed. Unfortunately, no fire modeling was attempted during the production of the new PTA fire management plan, without such an effort, any attempts to quantify and qualify fire fuel loads, fire risk protocols, etc. are guess work. This work is proposed to be funded through other than DAR sources (FEIS - Part III, MOU).

Comment A14: *The environmental documentation provides an excellent reference to base decisions on preferred alternatives and environmental mitigation.*

Response: Comment noted.

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U.S. Department of the Army  
Conservation/Restoration Branch  
Environmental Division  
DPW Environmental Department  
Alvin Char, Chief, Conservation/Restoration Branch, Environmental Division  
Paul Eaves, Range Officer, DPTMSEC  
12-1-97

Comment A15: *The following statement in the DEIS is incorrect: "PTA is the only light infantry, live-fire facility in the Pacific for the U.S. Army Pacific Command and other Pacific Command units." Live fire training is undertaken at Makua and Schofield Barracks on a daily basis. PTA is the only place where we can conduct Artillery battalion and larger live fire exercises. It is the only place where we can do Attack helicopter live fire gunnery tables. It is the only place we can do Stinger Surface to air and air to air live fire operations. It is the only place we can do mounted 3/4 Cav .50 caliber Machine Gun gunnery tables training. It is the only place where we can do TOW gunnery tables live fire. All of these live firing events are important readiness training events.*

*PTA is also an important live fire training range for Marine, Navy and USAF ground and air weapons systems. It is also used as a Joint Training area by CINCPAC and higher Commands.*

Response: Corrections made to FEIS.

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U.S. Department of Commerce  
National Oceanic and Atmospheric Administration  
National Ocean Service  
National Geodetic Survey  
Charles W. Challstrom, Acting Director  
11-9-97

Comment A16: *Geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the NGS home page at the following Internet*

*World Wide Web address: <http://www.ngs.noaa.gov>. If there are any planned activities which will disturb or destroy these monuments, NGS requires not less than 90 days notification in advance of such activities in order to plan for their relocation. NGS recommends that funding for this project includes the cost of any relocation(s) required.*

Response: Final design will locate any geodetic control monuments in the subject area.

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U.S. Environmental Protection Agency  
Region IX  
Cross Media Division  
San Francisco, CA  
1-16-98

*Comment A17: We have objections to the project based upon the potential for significant individual direct and indirect adverse impacts to water quality, wetlands, and threatened and endangered species habitats caused by any of the "Build" alternatives. In reviewing the DEIS, we find that the discussions of impacts to water quality, waters of the U.S., and particularly mitigation measures are deficient. The DEIS also fails to provide a sufficient discussion of the indirect and cumulative impacts caused by each of the proposed alternatives.*

Response: An alternatives analysis in accordance with Section 404(b)1 of the Clean Water Act has been conducted for Sections III and IV, which contain wetlands. The recommended alignments have been determined to be the least environmentally damaging practicable alternatives. Additional information has been provided within the FEIS regarding water quality, wetlands, and threatened and endangered species (ref: FEIS - Part III, 404(b)(1) and related correspondence). This report as revised in consultation with EPA, also contains mitigation measures for wetland impacts. The FEIS contains an expanded discussion of indirect and cumulative impacts to native ecosystems (ref: FEIS - Part I, 6.0).

*Comment A18: We are very concerned that FHWA never initiated the NEPA-404 Integration Memorandum of Understanding (MOU) to address Purpose and Need and alternatives analyzed in the DEIS. At this point, we remind FHWA of their obligation to the MOU and strongly recommend that the process be initiated at this point.*

Response: The Saddle Road project commenced prior to the enactment of the MOU and therefore is considered a "pipeline" project. Pursuant to Section X of the MOU, "pipeline projects which were extant on the date of the MOU may proceed to the next concurrence point without prejudice; however, signatory agencies may request and receive information developed in earlier phases of the project." A 404(b)(1) analysis of alternatives was submitted to the MOU signatory agencies to implement the MOU at the next concurrence point of Final EIS Development as stipulated in Appendix A to the MOU (ref: FEIS - Part III, Supporting Documentation).

Comment A19: *While the DEIS is generally well written, the lack of pertinent information and the degree of impact to sensitive wetland resources is cause for great concern. We strongly recommend that FHWA incorporate the information we found lacking in the DEIS into a more comprehensive FEIS.*

Response: A 404(b)(1) Analysis Report including a thorough analysis of wetland resources, impacts, and proposed conceptual mitigation was completed and submitted to the EPA, USFWS, and USACE. The report and associated correspondence resolving this matter is included in the FEIS - Part III, 404(b)(1).

Comment A20: *Because of the long duration of the construction, we anticipate that the FHWA will revisit environmental aspects of the project through reevaluations and/or other NEPA analysis and documentation. We recommend that FHWA use the commitments made in the FEIS as starting points to strengthen future environmental documentation. We request that such documentation be forwarded to this office for review and input.*

Response: In light of the magnitude of the project and the resultant time it will take to implement each section of its length, the information included and conclusions made in the FEIS may need to be revisited for portions of the project as environmental conditions change or conclusions become invalid. The 404(b)(1) Analysis Report submitted to the EPA includes commitments regarding wetlands mitigation, future environmental documentation, and Section 404 re-evaluations by HDOT. Commitments regarding other sensitive environmental resources are included in the FEIS and are further strengthened by interagency agreements developed for the project.

Comment A21: *We believe that there are alternative alignments and/or design modifications that may have lesser impacts to the resources found in Sections II, III, and IV. Based upon the DEIS, FHWA has not shown that other alternatives, such as modifying the roadway footprint or other alignments, might have lesser impacts or avoid resources. This is particularly true for Sections III and IV.*

Response: The FEIS, Chapter 2, Alternatives, has been expanded to provide a more rigorous comparative analysis of alternatives. In addition, the 404(b)(1) Analysis Report and associated correspondence resolving this matter is contained in the FEIS - Part III. It presents a more detailed analysis leading to selection of the LEDPA for Sections III and IV, which was concurred by EPA.

Comment A22: *We believe that other alignment alternatives that could achieve the Purpose and Need for the project may be possible. Specifically, we request that FHWA provide documentation regarding other alternatives in Section IV that avoided or had lesser impacts to wetland areas.*

Response: Refer to response to Comment A21.



*Comment A23: Provide rationale for attempting to achieve a design speed of 80 to 100 km per hour, a design speed that is as high or higher than other similar facilities on the island. Would the Section III alignment need as much modification, with the related resource impacts, if the design speed was lowered and there was an enforcement presence? Does reduction of the roadway speed give greater latitude in attempting to meet grade and turn safety standards? The FEIS should include a more detailed discussion of FHWA's evaluation of alternatives and rationale for proposing the alternative selection criteria.*

Response: The design speed of 80 to 100 km per hour is necessary to achieve one of the primary project's purpose and need criteria to provide an efficient cross-island transportation commuter route. This speed is actually lower than many similar facilities on the island such as the Queen Ka'ahumanu Highway and the SR 190, which have design speeds in excess of 110 km per hour. The roadway is currently designed for a minimum design speed of 80 km per hour. The recommended design speed for this type of facility by current AASHTO standards is 100 km per hour. Further reduction of the design speed does not meet the test of practicability in light of the purpose and need. Although a lower design speed may result in minimally less impact to the resources, the efficiency of the road for its intended purpose would be greatly impacted.

Through Section III, a reduction in speed would be a major safety concern. This section of the road is through a forest area. There are no homes or businesses in the area. The motoring public would not anticipate a need for slowing through this area and thus would tend to travel faster than the posted speed. There are many head-on collisions on the island's existing roadways which have lower speed limits and little or no passing sight distance. The travel time from Hilo to Kona is approximately 2 hours. Slow moving vehicles are a cause of frustration to the commuting public. One of the most important design considerations for the proposed roadway is a safe and efficient transportation corridor that will reduce accidents. Refer to response to Comment A21, and 404(b)(1) report (ref: FEIS - Part III).

*Comment A24: We believe that FHWA has not fulfilled their obligation under NEPA to offer potential mitigation for cumulative and indirect effects. We recommend that they continue consulting with the USFWS and request inclusion in further discussions and resolutions of these issues.*

Response: The 404(b)(1) Report and related correspondence, and Chapters 3 and 6 of the FEIS have been revised to address this concern. Consultation with USFWS resulted in a resolution of mitigation issues as presented in the FEIS. Additional discussion of indirect and cumulative effects has been added to Chapter 6 of the FEIS.

*Comment A25: Statements in the DEIS that Sections I and II do not contain waters of the U.S. are incorrect. At least some of the ephemeral drainages, washes, and intermittent streams described as needing culverts or crossings to avoid flooding on the road, are waters of the U.S.*

Response: The Waters of the U. S. determination in the DEIS was made by the U.S. Army Corps of Engineers based on field evaluation and hydrology in the area. As stated in the August 22, 1997 letter from Ray H. Jyo, Director of Engineering and Technical Services, U.S. Army Corps of Engineers, the gulches within Section I and II along the proposed alignments do not exhibit evidence of an "ordinary high water mark" and are therefore not considered jurisdictional waters. Consequently, a 404 permit for the culvert and bridge crossings on Sections I and II will not be required. The EPA has agreed with this evaluation in a letter to the FHWA, dated August 12, 1998 (ref: FEIS - Part III, 404(b)(1) and related correspondence). It should be noted that the culvert crossings will be permitted under the National Pollutant Discharge Elimination System permit of the Clean Water Act, which regulates point discharges.

*Comment A26: The DEIS reports acreages of direct wetland impacts for Sections III and IV, and states that no distinct biological functions are known for the wetlands in the area. The discussion should clarify that the functional importance of the physical, chemical, and biological aspects of the wetland types are not well known. Based upon the discussion of the vegetation types present and the extent of the vegetative cover, the maturity of the vegetation, the quality and diversity of the habitat, and the hydrology, we believe that wetland resources in the project area may in fact be highly functioning resources, due to the unique assemblage of vegetation, soils, and hydrology.*

Response: A "404(b)(1) Analysis Report has been included in the FEIS [ref: FEIS - Part III, 404(b)(1)]. It addresses the values and functions of the wetland areas. The valuation of the biological functions of the wetlands is also discussed in a letter response from FHWA to EPA, dated September 1, 1998 (ref: FEIS - Part III, 404(b)(1) and associated correspondence).

*Comment A27: Statements that the biotic communities are widespread may not be accurate. DEIS suggests that several of these communities found in the study area are found only on this part of the island. The groundwater recharge and associated water quality and quantity functions of these areas could be significant but is not documented. Therefore, we believe that the areas to be impacted by the alignments within Sections III and IV may be highly valuable. While there may be areas that are interpreted to be less valuable biologically due to the absence of native vegetation, such as along alignment E-3, we suggest that FHWA exercise environmental stewardship. These areas have ecological and functional value and therefore will require mitigation. We recommend that opportunities for preservation and enhancement be explored within the project area.*

Response: A 404(b)(1) Analysis Report and associated correspondence have been prepared to address the values and functions of the wetland areas including groundwater recharge and associated water quality and quantity, as well as the mitigation appropriate to offset losses of wetland values and functions [ref: FEIS - Part III, 404(b)(1), and associated correspondence.

Comment A28: *The DEIS offers no mitigation measures to offset impacts to wetlands. The FHWA should identify other wetland areas, similar to those impacted, which could be suitable for protection and management.*

Response: A "404(b)(1) Analysis Report and associated correspondence prepared for the project address the values and functions of the wetland areas as well as the mitigation appropriate to offset losses of wetland values and functions (ref: FEIS - Part III, 404(b)(1) and associated correspondence.

Comment A29: *FHWA should engage in discussions with EPA, the USFWS, and the USACE to determine appropriate sites that are unprotected and have a potential for loss of resources, mitigation ratios, and estimated costs and potential funding and management mechanisms. Discussions of mitigation should identify the location of the mitigation areas and should include a detailed presentation of the hydrology, biology, and habitat functions of the areas in which the proposed mitigation would take place. We understand that the USFWS may have identified a wetland and endangered species area that may have opportunities for enhancement activities. We would appreciate further information. Development of these mitigation commitments must be made before FHWA releases the FEIS to the public.*

Response: Discussions were held and an agreement was reached on mitigation. Refer to response to Comment A28 and associated correspondence to the 404(b)(1) Analysis Report (ref: FEIS - Part III).

Comment A30: *Indirect impacts to wetlands are not included. FEIS should explain whether the project alters the surface or shallow subsurface hydrology of the area, possibly resulting in additional losses of wetlands, and how to mitigate those losses.*

Response: Indirect impacts to native habitat containing wetland microsites are included in the FEIS (ref: Part I, 6.2). In addition, a "404(b)(1) report has been prepared which addresses concerns regarding surface and groundwater impacts. Information regarding existing wells in Section IV has been added to the FEIS (ref: Part I, 3.10).

Comment A31: *Erosion, runoff, and material spills during construction and operation of a roadway can contaminate and degrade groundwater sources such as aquifers. The DEIS discussion of hydrology is sparse and does not provide meaningful information to evaluate and arrive at an understanding of the impacts to these resources. FHWA acknowledged an increase in contaminants in runoff entering the roadway, however, the DEIS only mentioned groundwater resources on the western end in Section I and II and does not provide similar information regarding hydrology and groundwater depths in Sections III and IV. The DEIS also did not discuss drinking water sources from any potentially affected wells in these sections. We have information, found in a Department of Water Supply August 1997 Environmental Assessment, that a local well planned for a location very close to the existing Saddle Road in Section IV, and that there is an existing reservoir adjacent to the road. A better description of the ground water,*

*geology, and aquifer types and depths would have been helpful. The DEIS discusses the extremely porous soils and substrates, but does not go further to relate these to impacts to groundwater and hydrology. The FEIS should have a discussion of the hydrological relationship between the aquifer and the potential for leaching of surface runoff water to the aquifer. FHWA should provide information on these hydrological and groundwater issues, and provide a detailed discussion of the surface - ground water connectivity.*

Response: A 404(b)(1) Analysis Report has been prepared which addresses these concerns [FEIS - Part III, 404(b)(1)].

*Comment A32: The DEIS mentions that DLNR is directing a cross-island water transmission project to bring additional water to the west side of the island using the Saddle road as a guide for the transmission lines. However, the DEIS addresses the impact on the DLNR project solely as interference with the construction and implementation of the transmission line and does not address the roadway runoff impact to the sources of water feeding the transmission line. FHWA should briefly describe the roadway construction and operation impact to the groundwater resources that the transmission line project is dependent on and if steps should be taken to avoid adverse impacts. We strongly recommend that FHWA consult with DLNR and the Department of Water Supply to determine the potential impacts and appropriate mitigation measures needed to protect drinking water sources.*

Response: Saddle Road is not a "guide" of the cross-island transmission line. The location of the line would be within the saddle between Mauna Kea and Mauna Loa. The Saddle Road project is not expected to interfere with the construction and implementation of the transmission line. The implementation of the transmission line has been deferred as there has not been a viable end user identified. The FHWA has consulted the Department of Water Supply on the impacts of the Saddle Road project and the Department had no concerns regarding impacts to groundwater wells from the roadway. A discussion of the impact of storm water runoff is presented in the "404(b)(1) (FEIS -Part III). This project is not expected to impact drinking water sources.

*Comment A33: The DEIS does not sufficiently discuss the potential for a net increase in nonpoint source pollution from the proposed project. FHWA should provide more detail to support such statements as "Contaminated Storm water could degrade the quality of surface waters or filter through soils and potentially impact groundwater sources." FHWA did not summarize any pollutant data from the Hydrology technical report. Therefore, suggesting any possible mitigation measures that would be appropriate for the project is difficult for us. However, we suggest that FHWA examine opportunities to altogether eliminate roadway contributions to the pollutant loads into water systems.*

Response: A discussion of the impact of storm water runoff from the roadway is presented in the FEIS in Section 3.10 Water Resources and in the "404(b)(1) Analysis Report (ref: FEIS - Part

III). Due to the relatively low volume of traffic, this project is not expected to impact drinking water sources.

*Comment A34: The DEIS does discuss the requirement to develop and implement a SWPPP, including specific BMPs to reduce pollution effects, before the commencement of construction. However, this plan does not discuss the location of the permanent facilities nor their efficiency to reduce or eliminate erosion and runoff impacts to groundwater. The DEIS does not describe potential impacts from any cut and fill operations, and dewatering that may take place if FHWA encounters groundwater. This plan should consider cumulative effects and should include a discharge monitoring plan. The DEIS does not discuss the conformance of the construction of the project with FHWA's "Final Rule on Erosion and Sediment Control on Highway Construction Projects," 23 CFR 650, Subpart B, revised July 26, 1994 (Fed. Reg. vol. 59, no. 142, 37935-37939). FHWA should discuss the relationship of this final rule to the project.*

**Response:** In order to fully develop a BMP Plan and a SWPPP, final topography and final design plans are required. The intent of the DEIS was to identify the necessary permits that will be required for the project but not to complete all permitting and design for each alternative. At the time of the publication of the DEIS, no alternatives have been selected as their recommended alignment, therefore, site specific permanent facilities and designs were not completed. In addition, funding for some of the roadway sections may not be available for a number of years and technology and practices may change. Complete and site-specific BMP Plans and SWPPPs will be developed as part of the roadway construction plans and specifications and permitting requirements based on the most current technology at the time of the design. The project will comply with the FHWA's "Final Rule on Erosion and Sediment Control on Highway Construction Projects," Subpart B, revised July 26, 1994," and any other regulations applicable at the time of construction.

*Comment A35: We recommend that FHWA further describe the BMPs that will be utilized and commit to their implementation in the Record of Decision (ROD).*

**Response:** Refer to response to Comment A34.

*Comment A36: EPA believes the impacts to threatened and endangered species are serious. The DEIS documents many potential threats from fire hazards, alien species, contaminated runoff, and human intrusion that will be further complicated and continued due to construction and operation of the project. We are particularly concerned with the impacts to 'Aweoweo shrubland, hard stemmed lovegrass grassland, and Palila habitat and believe that the potential for fire impacts to seriously damage the unique native plant ecosystems is high. The FEIS should address, in a detailed discussion, the measures that FHWA will undertake to minimize impacts from fire on Palila and other species. We recommend that FHWA continue their consultation with the USFWS on measures to mitigate and minimize impacts to threatened and endangered species. We also support the USFWS in their concerns and comments regarding the*

*impacts to threatened and endangered species and encourage FHWA to initiate whatever mitigation measures they deem to be appropriate for the Palila and other species.*

Response: Comment noted. As part of the proposed fire-modeling mitigation, attention will be given to both the 'Aweoweo Shrubland and the Hard-Stemmed Lovegrass Grasslands located on the western end of Segments PTA-1 and PTA-3. Since the publication of the DEIS, consultation with the USFWS has continued for the purpose of refining measures to mitigate and minimize impacts to threatened and endangered species resulting in measures described in FEIS, Chapter 3, and the MOU (ref: FEIS - Part III) and agreed upon with USFWS.

*Comment A37: Pursuant to Public Law 010-508, Pollution Prevention Act of 1990 (PPA), "It is the policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible, and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner." Your subsequent NEPA document should describe how FHWA would carry out programs and practices to insure that the project will comply with the PPA. We have enclosed guidance on possible Pollution Prevention methods FHWA should consider.*

Response: State and Federal roadway specifications, Federal Acquisition Regulations, Special Contract Requirements, and permitting procedures will ensure compliance during construction with the Pollution Prevention Act of 1990 through requirements for contractors' frugal use of materials, recycling when possible, and strict cleanup and disposal standards (FEIS, 3.23 Construction Impacts).

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U.S. Department of the Interior  
Office of the Secretary  
Willie R. Taylor, Director, Office of Environmental Policy and Compliance  
2-12-98

*Comment A38: We concur that there is no prudent and feasible alternative to the proposed project if project objectives are to be met. However, we do not believe that all possible planning has been done to minimize harm to Section 4(f) resources. We recommend continued cooperation and coordination with the State Historic Preservation Officer in order to prepare a Memorandum of Agreement (MOA) which should include measures to avoid or minimize harm to the archeological sites that may be affected by the proposed project, including native Hawaiian burial and ritual sites, in compliance with Section 106 of the NHPA of 1966, as amended. A signed copy of the MOA should be included in a Final Section 4(f) Evaluation which should be made a part of the FEIS.*

Response: The EIS addresses the applicability of Section 4(f) to archaeological, state park, and wildlife preserve resources (FEIS - Part I, 3.24). Since the portions of the seven linear properties

within the APE are significant by Criteria D only and are not required to be preserved in place, there is no effect on the criteria that makes the sites eligible for the NHRP. This fact coupled with mitigation approved by the SHPO leads to the conclusion that there are no Section 4(f) properties impacted by the project. An executed MOA stipulating measures that will be taken to minimize harm to these archaeological sites has been developed in cooperation with the Hawai'i SHPO, HDOT, ACHP, and OHA, and included in the FEIS (ref: Part III, MOA).

*Comment A39: We recommend that greater detail be provided in the sections of the EIS pertaining to the affected environment and mitigation to clearly link project impacts to proposed mitigation. The document acknowledges that there may be an increase in quantity and distribution of pest species, including plants, mammalian predators (released pets and rodents associated with human activity) and invertebrate pests (ants, wasps and bees, bugs, beetles, etc.); however, the environmental impacts of these organisms to trust resources are not well described. Alien species invasions are known to be the primary cause of habitat fragmentation and degradation in Hawai'i and one of the major threats to the survival and health of native species in Hawai'i.*

Response: These issues are discussed and citations to current literature have been provided in the BA and the BO (ref: FEIS - Part III). Several books have been written on the subject of the impacts of introduced species to the native ecosystems in Hawai'i. There is no current literature that specifically reports on the results of road construction relative to the impacts of alien species on native habitats on the Island of Hawai'i. Mitigation measures to control alien species introduction and spreading during construction and after HDOT begins maintenance are described in the BA, BO and the 404(b)(1) report (FEIS - Part I, 3.0 and Part III).

With regard to mammalian predators and why project-wide mitigation was not proposed to offset these impacts, the issue of alien mammalian predators on the Island of Hawai'i is much broader and widespread than the scope of this project, the EIS, or current USFWS policy. Mammalian predators, especially cats, mongooses, and dogs, are ubiquitous on the Island of Hawai'i and until public policies and social mores change to the point that controlling or eliminating cats and dogs is politically expedient on an Island ecosystem level, little can be done to reduce the potential spread of these predators. Impacts occurring due to the past and potential future introduction of mammalian predators is not a result of the proposed roadway improvements, and roadway improvements are not expected to exacerbate this situation. Project mitigation would implement predator control within the approximately 10,000 acres that is proposed to be set aside for the Palila mitigation.

*Comment A40: Mitigation for expected alien species impact is proposed in the form of treating construction equipment, spraying and mowing roadsides, and funding research on biology and interactions of invertebrate pests on Palila food resources. Because the impacts of alien species will continue past the construction of the project, the USFWS recommends that additional, long-term mitigation be investigated and proposed.*

Response: Mitigation measures proposed for this project were developed to offset potential impacts of alien species on the habitat along Saddle Road. Over a ten-year period, the project would fund alien predator and ungulate control within the 10,000 acres proposed for mamane habitat restoration. In addition, funds have been proposed for alien insect control studies. See also response to Comment A39 and the BO (ref: FEIS - Part III).

*Comment A41: Plant and invertebrate Species of Concern (SOCs) are only briefly mentioned in the DEIS. Adverse impacts to SOCs and other native wildlife should be given full consideration as part of the NEPA process. Therefore, the EIS should include a discussion of impacts to these resources and identify measures to avoid, minimize, or mitigate these impacts. Because of the scope of the project, it is anticipated that the planning and construction phases will span several years. It is likely, therefore, that some of the SOCs could become listed species by the time the project is completed and, therefore, be subject to consultation under Section 7 of the ESA of 1973, as amended.*

Response: The term SOC is a term-of-art that describes the entire realm of taxa whose conservation status may be of concern to the USFWS, but this term does not have official status. All attempts will be made to avoid rare, native organisms during construction. Standard specifications and special contract requirements will be designed to minimize these impacts. Contractors will be required to participate in an environmental quality control program.

*Comment A42: The existing discussion of fire management is limited to the PTA and their fire management plan. This discussion should be expanded to address fire sensitive areas in other sections of the project corridor where there is a possibility of fire (i.e., east and west of PTA) and should be modified to address proactive and preventative measures, such as presuppression activities that could include firebreak maintenance and fire hazard signage, in addition to the proposed detailed reactive plan.*

Response: While the threat of fire is and will continue to be present along the entire roadway corridor as noted in the EIS, the magnitude of this threat within Section II (PTA) is substantially greater than in Sections I, III, and IV. For this reason, more aggressive fire prevention and fire management measures are warranted for Section II. The presence of mixed Hard-stemmed Lovegrass Grassland and the 'Aweoweo shrubland found on the alluvial flats along the western end of Section II and the eastern end of Section I, was not specifically addressed in the proposed project mitigation. The proposed mitigation associated with fire modeling and management plans shall include these habitats, which contain a high proportion of native plant species.

Section 3.9.3 of the FEIS outlines the mitigation measures proposed to minimize the threat of fire. These measures include the construction of six 80,000 gallon dip tanks, two humvee pumper trucks, one 2,000 gallon tank truck, and equipment necessary to supply an 86-person fire-fighting detail. The measures also require that a fire ecologist be contracted to create a fire model(s) consistent with current methodology for high-altitude xeric-plant communities, such as high desert chaparral. The fire ecologist will also develop a comprehensive fire management



plan complete with a fuels management plan, risk assessment protocols, and prevention and suppression guidelines consistent with Palila habitat recovery goals for use by the PTA and other fire-fighting entities.

The fire ecologist will work closely with local vegetation ecologists familiar with Hawaiian ecosystems to maximize the effectiveness of the plans generated. As a result, the local vegetation ecologists will gain training in high-elevation xeric-plant communities' fire-modeling techniques. As conditions change over time, this training will enhance the resident vegetation ecologists' ability to provide effective guidance on fire modeling and management, providing a continuity in fire management on Mauna Kea even after the initial mitigation funds have been expended.

The paved firebreak shoulders detailed in both the FEIS and the BA require minimal maintenance. The issue of other firebreak maintenance within the PTA and immediate environs is well covered in the USAG-HI fire plan. The Army will continue to maintain these firebreaks. The Army does maintain a fire hazard signage program. Additional fire hazard signage will be provided by the project at planned pullout locations as warranted.

*Comment A43: Under Section 404 of the Clean Water Act, unavoidable project impacts to native-dominated wetlands could require mitigation. Determination of the appropriate type, amount, and location of mitigation should be accomplished prior to project initiation.*

Response: Refer to response to Comment A29. See also the 404(b)(1) Analysis Report and Associated Correspondence (ref: FEIS - Part III).

*Comment A44: The USFWS recommends that a separate biologically oriented entity (other than the Palila Oversight Committee) be appointed to administer mitigation and the associated funds for the entire project or portions of the project that are outside of the Palila Oversight Committee's jurisdiction. We also recommend that this separate entity have the ability to ensure that mitigation requirements are met as agreed prior to the beginning of the project. In order to assist this entity, the USFWS also recommends that a biologist be hired and remain on site for the duration of construction. In order to mitigate for impacts outside of the Palila Oversight Committee's jurisdiction and/or which are expected to occur after the project is completed, it may be beneficial to set up a trust fund which is administered by the separate entity.*

Response: Implementation of the Palila Mitigation Plan will be ensured through appropriate interagency agreements (MOA) based upon the stipulations in the MOU. The MOU also stipulates that the FHWA will function as the oversight committee to ensure adherence to the MOU requirements (ref: FEIS - Part III).

*Comment A45: The USFWS recommends that a project-wide resource education and interpretation system be established. In cases where there appears not to be a way to mitigate*

*expected impacts or mitigation of these impacts is unattainable, we recommend that these instances be clearly stated in the FEIS and reasons for the lack of mitigation identified.*

Response: In an effort to reduce the further spread of noxious weeds, alien plants, insects, etc., by the users of the proposed roadway, the FHWA proposes that informational signs be placed in proximity to historical markers, and other planned, pullouts or parking areas, explaining the diversity and importance of the native habitats found within the saddle area, the importance of not introducing alien species into the environment, and fire dangers and effects. Also proposed is the judicious use of guardrail/fence and the placement of pullouts and parking areas, which will be coordinated with the USFWS because their location could have a significant impact in steering motorists and sightseers away from biologically sensitive areas. However, any pullouts, parking areas, kiosks, trail systems, or other features that would be included in the project for the sole purpose of disseminating biological resource information could not be considered a reasonable expenditure of public funds for this project.

*Comment A46: Section 3.3.4 of the DEIS provides little information concerning other recreational uses besides hunting. The USFWS recommends that recreational activities other than hunting, such as gathering, birdwatching, and nature study be addressed under the affected environment section of the FEIS. The uniqueness of Hawai'i's biological communities draw naturalists, scientists and recreationists who come to hike, observe, and study Hawai'i's unique life forms and biological assemblages. The impacts of these user groups may be similar to that of the hunter group. We assert that these user groups deserve equal consideration in development of the construction plan and mitigation measures.*

Response: The FEIS contains an expanded discussion of recreational activities that occur in the Saddle, including birding, hiking, and nature study (ref: 3.3.4.1 Affected Environment). It includes an assessment of impact, if any, that the various project alternatives may have on these activities (ref: 3.3.4.2 Environmental Impacts), and mitigation for any adverse impacts (ref: 3.3.4.2 Mitigation Measures). The proposed Palila mitigation will open some 5,000 acres of land to the public for nature appreciation, birdwatching, native resource gathering, etc. Refer to Supplement to Social Impact Assessment (ref: FEIS, Part III).

*Comment A47: Relocations of the PTA buildings near the Bradshaw Army Airstrip to the west of their current location will adversely impact native shrub land and grassland which is potential habitat to the plant species, Silene hawaiiensis, a federally threatened species. The USFWS recommends that the impacts of these building relocations be evaluated and possible mitigative measures be identified in the FEIS.*

Response: The USAG-HI will address possible impacts to *Silene hawaiiensis* from relocation of buildings for the proposed roadway in their environmental documentation for garrison development.

Comment A48: *Section 3.9 Fire Hazard does not adequately address the portion of Section I that traverses native grassland and shrub land, and shrub land invaded by fountain grass. All of Section I is not kikuyu-dominated pasture. The upper portions of this section possess a vegetation structure that is very flammable and is contiguous with rare plant habitat. Native a'ali'i shrub land and native hard-stemmed lovegrass are unique to Hawai'i, the latter occurring exclusively in alluvial flats of the PTA. The proposed project would increase the likelihood of wildfire caused by human activity along upper portions of Section I and perhaps the upper portions of Section III. The USFWS recommends that fire hazard for these portions of the proposed project be addressed under Sections 3.9.1, Affected Environment,; 3.9.2, Environmental Consequences; and 3.9.3, Mitigation Measures.*

Response: Refer to response to Comment A42.

Comment A49: *The BA addresses the implementation of the PTA Fire Plan and the hiring of a fire ecologist to develop a more thorough plan that pertains to the upper portion of Section I, the eastern portion of Section II, and the western end of Section III. The USFWS recommends that the EIS address how the PTA Fire Plan will be expanded to include these other portions of the project and when the revised plan is expected to be completed.*

Response: The FEIS addresses the implementation of the PTA Fire Plan and the hiring of a fire ecologist to develop a more thorough plan encompassing the additional areas. The USFWS and USAG-HI are also addressing this issue in the process of their ongoing Section 7 consultation over Army training within the PTA.

Comment A50: *The USFWS agrees with the preliminary estimates of wetland area presented in the DEIS, however, more accurate delineations may need to be performed during the final alignment of these sections to determine the true area of wetland fill.*

Response: In consultations with the USACE, it was agreed that the microsite nature of the wetland inclusions interspersed in uplands makes it impossible to precisely delineate wetland boundaries. The NEPA/404 MOU signatory agencies have concurred in the methods of wetland delineation and mitigation proposed (ref: FEIS - Part III, 404(b)(1) and Associated Correspondence). However, additional verification impacts will be undertaken by HDOT when funding for construction of Saddle Road within Sections III and IV becomes available.

Comment A51: *The USFWS disagrees with the stated value of the wetlands put forward in the DEIS: "no distinct wetland biological functions are known from any of the wetlands within the study area" these functions are non-existent and the biological implications of wetland fill are therefore minimal (DEIS, page 3-113).*

*Wetland indicators and inclusions are intrinsic characteristics of the valuable biological communities traversed by the proposed alignment. The vegetation types which contain wetlands support listed species of plants ('Ohi'a forest, Koa-'Ohi'a forest) or are successional*

*antecedents of such vegetation ('Ohi'a scrub). The role of wetland hydrology and soils in fostering native animal and plant diversity in these systems is unknown but potentially important. The USFWS therefore disagrees with the statement that the "biological value of these wetland areas is not associated with their wetland qualities (DEIS, page 3-114)."*

*The USFWS also does not agree with assertion (DEIS, page 3-113 - 3-114) that the native biotic communities in Sections III and IV are widespread. When the plant community of one of the wetlands near the road ('Ohi'a forest) includes a species with nine extant individuals, that plant community cannot be considered widespread. As stated in the DEIS, the vegetation (and other biota) reflect the age and type of the lava substrate and the microclimate. Windward Mauna Loa lava flows of that age and at that elevation are nationally scarce, and scarce even within the Hawaiian islands. Additional lava flows, as well as continued degradation of wet forest in Hawai'i by alien species of plants and animals, will make intact examples of these communities more scarce in the future.*

*The statement that none of the wetlands contains any unique combination of species conflicts with the botanical surveys which show *Clermontia peleana* ssp. *Peleana* (endangered), *Cyanea platyphylla* (endangered), *Tetraplasandra oahuensis* and *Trematolobelia grandifolia* (species of concern) in the 'Ohi'a forest wetlands adjacent to the proposed alignment (Technical Appendix 1, Section III). None of the other seven individuals of *Clermontia peleana* ssp. *Peleana* grows in proximity to *Tetraplasandra oahuensis* and *Trematolobelia grandifolia*. The USFWS must assume that this vegetation community, including its wetland characteristics, is crucial to the survival and recovery of *Clermontia peleana* ssp. *Peleana*, *Cyanea platyphylla* and other rare species.*

*Based on these factors, we believe the native-dominated wetlands impacted by the proposed project to be of high value and relatively scarce. The agriculturally disturbed wetlands in Segment E-3 are recognized as lower value than the native-dominated wetlands.*

*Avoidance of wetlands along the alignment is not possible and minimization of wetland area to be impacted has been pursued during planning. The USFWS agrees that replacement or enhancement are not feasible options. The next most preferable mitigation option for wetland impacts is protection and management of existing, unprotected native wetlands similar to those in the project area. The permanent net loss of high value wetlands, with the added potential of the project to lead indirectly to further degradation of wetlands along the corridor (DEIS, page 3-113), creates a need for the area of wetlands protected to exceed the area lost by a large factor.*

**Response:** The native biotic communities in Sections III and IV are not widespread from the state-wide perspective, since they are limited to the windward side of the Island of Hawai'i. The community types can only be considered widespread in the context of the Saddle region and only by generalizing that these 'ohi'a and koa dominated vegetations in the project area are similar to the other 'ohi'a and koa community types of windward Hawai'i. Rare plants or combinations of

rare plants occur within these community types, and in two known cases, rare plants and unique combinations of plants occur over 200 m outside of the proposed ROW of Section III. As stated in the DEIS, the communities of the project area are considered to have very high value as part of the native rain forest of windward Hawai'i; the continued healthy function of this ecosystem, unique to the planet, is a serious responsibility of the project proponents and all cooperating agencies.

Under advice from USACE, wetland determinations were made only within a 90-m corridor centered on the proposed alignments, and all delineation sample points were located within the 40-m wide proposed ROW. A determination was made that the 'ohi'a Forest near MP14 was entirely wetland. This determination applies only to the 0.25 ha of this community that is within the proposed ROW. This determination should not be taken to imply that the entire 'ohi'a Forest community type of the region is jurisdictional wetland. A detailed study of the wetland conditions of the Saddle, undertaken by personnel from the USACE Waterways Laboratory (Wakely et al. 1996. Wetlands 16(2)173-184) determined that none of the forest communities they sampled was more than 10 percent wetland. Two of their sites were near the Saddle Road corridor.

Further discussion of the biological function of jurisdictional wetlands within the project area is necessary. The DEIS states that jurisdictional wetlands occur in a mosaic of microsites within wetland-containing sites, themselves in a mosaic of wetland/upland sites, and that no biological functions were identified for these wetlands. USFWS states that the wetland functions, although poorly understood, are an integral part of the ecology of these valuable communities.

Within the native plant communities of Sections III and IV, the National Wetlands Inventory (NWI) status of all plants found within communities that would be impacted range from UPLAND to FACULTATIVE+, no OBLIGATE or FACULTATIVE WETLAND species. The wetland study found that the vegetation changes subtly as soil-saturation of poorly-drained microsites increases within a larger site. These changes were in the form of shifts in the percent cover and dominance of species, never in the presence or absence of any species. This is an indication that soil conditions and the vegetation form a continuum; areas with microsites that have all three criteria of jurisdictional wetlands present are quantitatively, but not qualitatively, different from surrounding 'upland' sites. While it is reasonable to state that the wetland microsites may have unknown biological function, the data available do not support that position. The only taxonomic group of organisms systematically sampled within the wetland zone is vascular plants; the plants do not show a qualitative response to the wetlands. The response of other groups, such as invertebrates and microorganisms, is not known. The response of plants to drainage conditions can be described as that of 'generalists,' i.e., they are facultative plants. Since other organisms are often dependent upon the plant species present, in this case, ubiquitous native generalists, no support is given for the view that the wetland microsites would have a unique, but unseen, flora or fauna.

USFWS states that the wetlands may have significant function in the development of the native ecosystems and their diversity. As an endpoint of a continuum of conditions, these wetlands can be considered an integral part of the environment. However, their function is absolutely site specific. They cannot be viewed as a 'keystone resource' providing services to organisms in surrounding uplands. The wetlands occur in mosaics on several scales. The proposed road-building would obliterate the existing communities within its footprint, including any wetland microsites. The wetland microsites in nearby, undisturbed vegetation would remain, providing their function on the same basis as before. The filling of wetlands can be evaluated as having exactly the same biological impact for the surrounding and regional ecosystem as the destruction of the vegetation that contains the wetland microsites. Therefore, it was concluded that the wetlands that would be filled have no known biological function important to any location outside the microsite itself.

The forgoing discussion is essential to choosing a responsible management or regulatory approach. Use of a 'wetland' model, based on the regulatory framework of Section 404 of the Clean Water Act will not protect the biological resources of the project area. Although jurisdictional wetlands do occur in the project area and a Department of the Army Permit is required, a focus on protection of the wetlands and mitigation of their fill could result in harm to the environment. A focus on wetlands implies that they are of more significance than upland areas, either outside the wetland zone or those interspersed within the wetland mosaic. This position has been refuted by both USFWS and DOFAW in their comments that the more diverse forest communities should always be avoided, even at the expense of greater wetland fill. The biological values of the region have not been associated with jurisdictional wetlands, except within the regulatory framework. A focus on wetland sites and microsites is an unworkable model since they are embedded in an equally valuable upland vegetation, and the wetland microsites are not seen as viable plant stands.

Compensatory mitigation, as suggested by USFWS and EPA, offers no benefit to the biological communities that would be impacted by the proposed action. As illustrated above, wetlands that might be filled do not function as essential resources for surrounding communities and organisms. Therefore, a protected or constructed wetland at another site, would be irrelevant to the biological function of impacted communities. Refer to the associated correspondence to the 404(b)(1) Analysis Report (ref: FEIS - Part III).

An ecosystem model would be more appropriate for analysis, mitigation, and management of the proposed roadway. This model would have the objectives of protecting and maintaining the integrity, diversity, and function of the regional ecosystem and the communities immediately adjacent to the project. This ecosystem approach has been explained in the FEIS (ref: Part I, 6.0). The recommended mitigation actions agreed upon with the EPA, USFWS, and USACE [ref: FEIS - Part III, 404(b)(1) and associated correspondence] are based on the ecosystem approach which avoids the most sensitive resources and minimizes the area of impact throughout. Unavoidable short-term impact would be mitigated by an active program of restoration of all

disturbances of the project area with the exception of the paved travel-way and grassy shoulders and other appurtenances such as pullouts or rest stops.

*Comment A52: We recommend that FHWA initiate discussions with the USFWS, USACE, the EPA, and the State of Hawai'i DLNR-DOFAW to determine appropriate mitigation ratio, locate mitigation site, estimate costs of ungulate-proof fencing and yearly maintenance (weed control) for the mitigation area, and explore creation of a mitigation fund to be held in trust by a third-party, non-profit, technically competent organization.*

Response: A 404(b)(1) Analysis Report including a thorough analysis of wetland resources, impacts, and proposed conceptual mitigation was completed and submitted to the EPA, USFWS, and USACE (ref: FEIS - Part III). The Report and associated correspondence includes commitments regarding wetlands mitigation and future EIS documentation and 404 issues re-evaluation by HDOT. Consultation with USFWS and EPA resulted in a resolution of mitigation issues as presented in the FEIS and related correspondence regarding the 404(b)(1) report.

*Comment A53: The USFWS strongly recommends that mitigation commitments be secured prior to disturbance of wetlands by the proposed project.*

Response: Current DAR construction mitigation funds cannot be used outside of Section II and HDOT has not currently programmed monies for projects in Sections III or IV. Also refer to response to Comment A51 and A52.

*Comment A54: To minimize impacts to wetlands, the USFWS suggests that no scenic pullouts be located in or near kipuka of ohia or koa-ohia forest and methods to discourage stopping near these kipuka be implemented (i.e., signage stating that pullouts are located further down the road away from the kipuka, etc.) This may help to reduce human and other animal intrusion, dumping of unwanted pets or proliferation of scavengers such as rats.*

Response: Agreement has been reached with the USFWS during Section 7 Consultation that coordination with USFWS biologists would be initiated during final design of Sections III and IV to assist in the prudent siting of pullouts and parking areas consistent with the protection of adjacent environmental resources including kipuka.

*Comment A55: Potential impacts to native vegetation and invertebrate resources from alien plant and invertebrate introductions and ungulates and mammalian predators should be discussed and measures to reduce these impacts identified.*

Response: Refer to response to Comment A39. The project will not result in an increase in ungulates or mammalian predators.

*Comment A56: Environmental consequences throughout Sections I and II include the permanent loss of habitat and unique plant communities which not only harbor endangered*

*species but are extremely precious in that they are the only examples of these habitats in existence. Mitigation for these losses should include protection of a much larger area than the quantity of habitat lost to construction. Protection should be in the form of fencing to remove all ungulates, complete weed control, and control of alien invertebrate pests where feasible.*

Response: Most of the habitat within Section I is highly disturbed pasture, dominated by various introduced forage species, no threatened or endangered plant or invertebrate species were detected within this segment. The eastern terminus of this section crosses through a 'Aweoweo Shrubland and mitigation addressing fire risks and invasive plant species in this area is outlined in the BA, BO, and the FEIS. It is not feasible nor prudent to propose indiscriminate fencing or pest and alien species control in a blanket fashion under either NEPA or the ESA. It should be recognized that "extremely precious" is not a protected status under the ESA.

*Comment A57: The USFWS recommends that an educational and informational kiosk be located atop the "7-steps" overlook to increase public awareness of unique plant communities, thereby potentially reducing future impacts to these resources. Use of a mitigation trust fund to fund protection and continuing management should be thoroughly explored in the EIS.*

Response: With the selection of the recommended alignment, the "7-Steps" area of the existing Saddle Road is outside the limits of the proposed project thus precluding the use of project funds to construct such a kiosk in that location. Further, this location would only serve local traffic after the improvement is completed, thus limiting the exposure of such an installation. Agreement was reached with USFWS during Section 7 Consultation that interpretive signage, providing information on biological resources, would be placed in planned pullout or parking areas along the improved Saddle Road alignment. Signage which would warn of fire dangers will also be provided.

*Comment A58: The FEIS should state that construction equipment will be steam cleaned and fumigated off site.*

Response: FEIS modified where noted (ref: FEIS - Part I, 3.18.3).

*Comment A59: The FEIS should explain how sterilization will be accomplished, how adequacy of sterilization will be assessed, and under what conditions sterilization will not occur or will not adequately kill alien species vectors. Under circumstances where the fill is not adequately sterilized, monitoring and alien species control efforts especially need to include those areas where the fill is deposited. Since an increase in quantity and distribution of alien plants along the roadway is not completely preventable, a detailed monitoring plan and implementation schedule is needed to prevent the establishment of alien plants that are spread.*

Response: Sterilization will be accomplished through the steam cleaning and fumigation of construction equipment off site. Following steam cleaning and fumigation the equipment will be inspected by the project engineer. The potential spread of fountain grass into disturbed areas



along the Recommended Alternative shall be mitigated by inspecting the ROW every four months during the course of construction and manually spraying any emerging fountain grass with a suitable herbicide. Following completion of construction, the roadway will fall under the maintenance jurisdiction of HDOT; they will maintain the roadway by mowing and when necessary, apply herbicides to control roadside weed and grass growth in consultation with biologists.

*Comment A60: Subsequent to construction, a constant, increased threat of invasion from alien species being transported along the road can be anticipated as a result of increased traffic.*

Response: As indicated in the FEIS, the invasion from alien species is an ongoing threat along the existing road corridor. An increased threat of invasion from alien species being transported along the road is anticipated following construction as traffic volumes increase over time. The transport of seeds and insect/mammal pests along the corridor is considered to be an unmitigable impact. Furthermore, the abandonment of unwanted pets along the corridor is considered a social problem rather than a result of roadway improvements. No means of controlling this phenomenon has been developed or successfully applied. Mitigation is committed, however, in research monies to continue Palila insect predator studies by the BRD/USGS in the Pohakuloa Flats area and by roadside control of alien plant species, by FHWA during construction and HDOT after construction. The HDOT control will continue within their ROW as part of their continuous maintenance program for state roads by mowing and herbicide applications as environmentally appropriate.

To a lesser degree, with the No-Action Alternative, the threat of invasion from alien species is also expected to increase.

*Comment A61: The long-term alien species control and monitoring plan must include staging areas as well as roadways, and needs to extend beyond the roadway at least 100 feet in Sections II and III, to prevent the spread of alien species from the roadway into adjacent native vegetation.*

Response: The long-term alien species control and monitoring plan will address the proposed ROW and any areas to be used for staging, stockpiling, etc. Proposed staging areas have been identified within sensitive biological areas at previously disturbed sites as follows: Section II - MP 33 south side of existing roadway, and west of Pu'u Nene in a highly disturbed lava field, Section III - MP 17.5 on south side of existing roadway and MP 13.5, and MP 11.75. It is not anticipated that alien species control and monitoring will extend 30 m (or 100 feet) beyond the edge of the ROW. It is intended that the plan will control the ROW, where alien species are likely to be introduced. The FHWA cannot control or assert jurisdiction over areas outside of the ROW. Within the PTA, the USAG-HI is addressing these issues in all areas under their control through their EMP.

Comment A62: *Fountain grass spread along EX-2, PTA-1, PTA-3, and EX-3 will be monitored every four months during construction and any emerging fountain grass will be sprayed with a suitable herbicide. Upon completion of construction, it is our understanding that HDOT will maintain the roadway with mowing, and where necessary use herbicides to control roadside weed and grass growth. This control should continue as long as the road is in operation. These actions should be included in the long-term monitoring and control plan. The alien species monitoring and control plan should be implemented in Section II and in or near all of the kipuka found in Section III of the project area. Within Section III, alien plant control should not include herbicide use along the margins of wet forest, since repeated past herbicide application has failed to control invasive grasses but has damaged native vegetation. Mowing is the preferred alternative. This plan should be expanded to include the entire length of the roadway and be developed and ready for implementation at the time construction starts.*

Response: Refer to response to Comments A59, A60, and A61.

Comment A63: *Potential secondary impacts of the project put *Cyanea platyphylla*, *Clermontia peleana* ssp. *Peleana*, and *Silene hawaiiensis* at increased risk. Secondary impacts include an increase in the number and distribution of alien species, an increase in threats from human disturbance due to an increase in traffic, and therefore, an increase in the probability that motorists will stop and disturb habitat or destroy the plants, and for *S. hawaiiensis*, an increase in the threat of fire. The USFWS recommends that appropriate mitigation be developed for these species, through implementation of a mitigation trust fund, propagation, and off-site mitigation.*

Response: During discussions with the USFWS regarding this particular plant, some confusion emerged as to the exact distance between the plant and the closest point of the proposed roadway. In the BA it was incorrectly stated that the plant is located approximately 175 m north of the existing centerline. With the availability of more detailed engineering drawings, however, the actual distance was determined to be 237 m north of the proposed ROW (EX-3), which is immediately adjacent to an existing HELCO power line easement. Since this plant is located well outside of the proposed roadway alignment and because the recommended alignment will not be constructed any closer to this plant than the existing alignment, this project will not have a deleterious impact on this species. Furthermore, it is assumed that the most immediate threat to this plant is posed by HELCO utility service activities along their power line service roadway.

The *Cyanea platyphylla*, which is located more than 250 m south of the existing roadway is the sole remaining individual of a larger population that has recently been heavily impacted by pigs. The FHWA and HDOT have proposed mitigation for this species as noted in correspondence from HDOT dated March 31, 1998; FHWA dated April 7, 1998; and USFWS dated March 19, 1998 (ref: FEIS - Part I, 3.18.3, Part II, 1.4.3, and Part III, BO).

For a response to the issue of *Silene hawaiiensis*, refer to response to Comment A64.

Comment A64: *The USFWS is concerned about the largest population of Silene hawaiiensis located in the northeast corner of PTA. If PTA-1 or PTA-3 is selected, the military training within the area of this large population of S. Hawaiiensis may increase and have a direct impact on this population. Ungulate browsing may also threaten this population. The USFWS strongly supports the implementation of conservation measures for this population and fencing of the population to protect it from humans and ungulates is recommended.*

Response: The referenced population of Silene hawaiiensis found north of deadman's curve along the existing roadway, is currently the largest known colony of this endemic species. The USAG-HI has agreed to fence this population as part of the mitigation for this project.

Comment A65: *The mitigation plan does not provide adequate information for understanding the biological background surrounding Palila mitigation. While we are certain that appropriate management is planned for these areas, explanations and justifications for the management choices should be expanded in order to strengthen the case for Palila mitigation.*

Response: The foundation and rationale behind the Palila mitigation required by the USFWS, as outlined in their letter to Moore, dated October 1996, is included in the FEIS - Part I, 3.18.3, Part II, 1.4.3, and Part III, BO).

Comment A66: *A schedule for the implementation of each action should be included for each Palila Mitigation plan as well as identification of the party(ies) responsible for carrying out each task. A site description of each parcel should be included that discusses the biological resources in the area as well as potential threats to Palila and/or Palila habitat. Current vegetation maps of all the mitigation areas should be included in the plan.*

Response: The schedule for implementation of each action is outlined in the FEIS - Part I, 3.18.3 and Part III, MOU. The essential components necessary for Palila restoration have been identified on the three parcels by biologists with USFWS and BRD/USGS and further work delineating resources within these areas falls within the responsibility of the USFWS or designated agency as a function of on site management and Palila recovery actions. The mapping of vegetation within the mitigation areas is beyond the scope of this EIS and will be the responsibility of the implementing agencies.

Comment A67: *The FEIS should explain that some mitigative decisions were based on economic and cultural as well as biological criteria. In order to maintain the biological integrity of Palila mitigation, decisions that were made for cultural or economic reasons (e.g., cattle grazing and mowed corridors) should be identified as such.*

Response: Decisions will be based on the guiding principles and agreements outlined in the MOU (ref: FEIS - Part III).

Comment A68: *Language on restoration should be used carefully. The term "rapid restoration," if used, should be defined. Introduction implies that Palila recovery is assured given intact habitat. Other possible causes for decline such as fire, disease, and effects of alien species should be acknowledged.*

Response: FIES modified as noted.

Comment A69: *"Adaptive management" should not preclude the development of detailed management plans with implementation timetables that will provide the basis for future adaptive management decisions.*

Response: Refer to the FEIS - Part I, 3.18.3, for a schedule of mitigation implementation. More specific detailed management plans and implementation time tables will be developed by the implementing agencies and specified in appropriate MOAs as funding becomes available.

Comment A70: *The plan should state that a qualified botanist survey all proposed fence lines prior to any clearing or fencing to ensure that the proposed area is free of endangered or rare species, and if such species are located along these lines, fence lines should be modified to avoid these species.*

Response: Specific survey and management protocols will be developed and documented as necessary by implementing agencies prior to specific mitigation tasks.

Comment A71: *Address need for firebreaks on the north and south sides of Pu'u Mali and Ka'ohe Lease Land. If fire breaks are deemed unnecessary, this should clearly be stated.*

Response: The project mitigation includes contracting with a fire ecologist to develop a comprehensive fire management plan. In accordance with the MOU, implementing agencies will undertake recommendations proposed in the plan.

Comment A72: *Map legends should be consistent between all three plans.*

Response: Corrections made to all maps.

Comment A73: *To explain the primary purpose of the paddocks, a statement should be included to this effect "In order to balance the interests of all members of the Oversight Committee, cattle grazing will be allowed in paddocks as an experimental fire control method. The Oversight Committee will evaluate the effects of such grazing in order to ensure that it does not counter the stated goal of regenerating mamane forest."*

Response: In order to balance the interests of all stakeholders, experimental grazing is proposed to be tested as a fire control method in two paddocks on the Pu'u Mali lands (ref: Rana 1997, Technical Appendices, Volume III). Impacts of this grazing will be monitored to ensure that it

does not compromise the stated primary goal of mamane forest restoration. As a result of consultation with the various stakeholder agencies, the concept of an Oversight Committee was modified. The FHWA will oversee and be responsible for ensuring that the individual mitigation tasks are implemented as bound by the concepts stipulated in the MOU.

*Comment A74: According to Figure 1 (Pu'u Mali Mitigation Site), the area designated for grazing contains substantial remnant forest. According to Mr. David, the area is primarily pasture. Provide current maps that correctly delineate vegetation types or reconcile this in the text. The proposed action shall not compromise the number one priority for which these lands are being set aside, the restoration of a mamane forest suitable for the reintroduction of Palila.*

Response: The maps used in the BA were prepared on USGS topographic quadrangle bases, and should not be construed as accurate vegetation mapping. The mapping of natural resources on the three mitigation parcels will be the responsibility of the implementing agencies.

*Comment A75: Include a detailed discussion of the proposed grazing regime and subsequent monitoring.*

Response: The development of a detailed adaptive management plan will be the responsibility of the implementing agencies within the framework of the MOU stipulations and agreements.

*Comment A76: Figure 1 for Kipuka 'Alala and Ka'ohē Lease Land plans should also delineate forested areas.*

Response: The map of Pu'u Mali was not meant to show current forested areas with the exception of the area demarcated as the ancient lava flow – the map was scanned from a USGS map as were the ones for the Ka'ohē Lease parcel and Kipuka 'Alala. The mapping of natural resources on the three mitigation parcels will be the responsibility of the implementing agencies.

*Comment A77: Dimensions of the cattle grazing paddocks in Ka'ohē Lease Land need to be identified in the text and on Figure 1. The area within the paddocks should be surveyed for the presence of rare, threatened, or endangered plant species. Measures should be taken to protect such species, such as modifying the grazing regime and/or construction of small scale exclosures.*

Response: The actual dimensions of the proposed paddocks will be determined by the implementing agencies based on their best scientific opinions and limitations of the actual field conditions encountered and modified on an annual basis as experience warrants pursuant to the guidelines of the MOU.

*Comment A78: Hunting section should address the goals and methods for feral ungulate control. Subsequent monitoring efforts should be discussed in "Monitoring and Data Collection."*

Response: At this time it is not thought that any feral ungulate control beyond fencing and maintenance of fencing will be required for either the Ka'ohē Lease lands or those in the Pu'u Mali area. Details of mitigation tasks will be developed by the implementing agencies.

*Comment A79: Pu'u Mali and Ka'ohē Lease Land management plans state that game bird hunting may be halted if the Oversight Committee believes the risk of unplanned fire ignition is too high to warrant the risk. While it may be unlikely, the decision to halt game bird hunting may be made for other reasons unrelated to fire risk, such as risk of harassment to the birds from gunfire. The plan should state that game bird hunting may be halted if the Oversight Committee believes there are risks to the Palila recovery effort, such as a high risk of unplanned fire ignition.*

Response: The comment refers to statements made in Appendix B of the BA (ref: Rana, 1997, Technical Appendices, Volume III). The BO and MOU have modified the function of the Oversight Committee. It should be noted, however, that pursuant to the MOU, all management actions harvesting and utilizing other natural resources within the Palila Critical Habitat mitigation lands will be allowed as long as they do not compromise the stated primary goal of Palila population recovery.

*Comment A80: The Monitoring and Data Collection section should be placed at the end of the plan after all the management actions are discussed. The baseline surveys should include a map of vegetation types, the general composition of each vegetation type, and detailed information on locations of rare, endangered plants. The USFWS recommends that any rare plants in areas designated for grazing or mowing have small fences erected around them for protection.*

Response: Conducting baseline surveys, associated environmental documentation or mapping vegetation within the Palila habitat replacement lands is beyond the scope of this project and will be the responsibility of the implementing agencies. This strategy was agreed to by the USFWS in early consultation on this issue.

*Comment A81: The USFWS recommends that more detailed information be included in the EIS about the methodology for vegetation monitoring and how restoration success, or lack thereof, will be determined. We also recommend that monitoring techniques for other restoration measures be included as well, such as monitoring for the success of manual/chemical weed control, predator control, ungulate control, invertebrates, and pathogens.*

Response: Details related to methodology for vegetation monitoring, etc., will be addressed in the detailed adaptive management plan developed by the implementing agencies within the framework of the MOU.

*Comment A82: The Habitat Restoration section should identify and discuss all techniques for mamane forest restoration to be used including cattle grazing, mechanical/chemical weed*

*control, outplanting, scarification, and passive regeneration. It may be helpful to select a mamane forest elsewhere for use as a control to monitor the success of various restoration techniques. In each management plan, the only method of alien plant removal mentioned is the use of cattle grazing to reduce fuel load. Other introduced plants threaten Palila habitat (e.g. Senecio mikanioides) and will require manual and chemical control.*

Response: The methods and methodology of measuring and quantifying the effectiveness of management actions will be developed by implementing agencies as stipulated in the MOU (ref: FEIS - Part III).

Comment A83: *Predator monitoring should be discussed in the Monitoring and Data Collection section, the Predator Control section should discuss predator control and discuss specific management actions for each predator threat.*

*The Pu'u Mali management plan calls for expansion of the current predator monitoring and control programs that are ongoing in the Mauna Kea Forest Reserve above this site. This current program should be described. Further, methods to control predators and monitor the results should not be limited to those methods currently being used, but should also allow for broader-scale and/or more effective methods that may be adopted for use in the future, such as aerial broadcast of rodenticides.*

Response: Refer to response to Comment A82.

Comment A84: *If predator control will be centered around nest trees, the actions should be expanded, since other species are also impacted by these predators, including the species of concern Dubautia arborea.*

Response: The specifics of predator control have not been formulated at this time and will be developed by the implementing agencies. However, it would appear obvious that since the operating principal behind the proposed Palila replacement lands as specified in the MOU is the regeneration of mamane forest, predators that impact the plants as well as those that more directly impact the birds should be controlled.

Comment A85: *With regard to fire ecology, the plan states that one third of the parcel will be mowed in varying patterns to produce fire breaks, stimulate mamane regeneration, and allow easier hunter access. Plan should state that the decision to mow is primarily to provide gamebird habitat and hunter access. Possible revision: "In recognition of the fact that gamebird hunting is a valued form of recreation by the public, and that this parcel in particular is of value to the hunting community, one third of the parcel will be mowed to support gamebird access. Such mowing is not expected to compromise the ultimate goal of mamane restoration because corridors will be realigned if mamane saplings appear and because such corridors will provide an important fire break."*

Response: The mowing regime is not planned to provide access for gamebirds, it is proposed as a way to reduce fire fuel load caused by the removal of grazing ungulates from an area that has a high component of fountain grass within it. The mowed area will also provide an attractive area for gamebirds to forage within, while the increased edge area created will provide increased cover for the birds.

Comment A86: *Management Plans should identify who will be responsible for funding the fire ecologist position and who will be responsible for drafting the fire management plan with risk assessment protocols and guidelines.*

Response: It is anticipated that the USAG-HI will fund this position. Refer to response to Comment A71 and FEIS - Part III, MOU.

Comment A87: *In Section 6, Cumulative Impacts, cumulative impacts are identified as "The development of Saddle Road would add the cumulative impacts on the physical, biological, and cultural resources of the island. It would require acquisition of land, the conversion of native habitat and existing land uses, and it would result in the partial loss of some cultural resources. It would improve access, result in an increase in traffic volumes, and be expected to increase public use of the area. As mitigation, the USFWS recommends the development of an ecological and cultural resource education and information system implemented across the length of the project. This system could include information regarding the nature of plant communities located along the project corridor and their uniqueness statewide and globally. It could also illustrate the numerous rare plant and animal species found in various habitats of the project and identify the threats to these ecosystem components. This information should be tied to the Hawaiian culture. Archaeological resources from the area could be discussed and identified. The system could help increase public awareness of trust resources along the corridor and their importance to Hawaiian culture and ecosystems. This measure could potentially help reduce the long-term impacts to resources affected by the project.*

Response: Refer to response to Comment A45.

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U.S. Department of the Interior  
Fish and Wildlife Service  
Pacific Islands Ecoregion  
Honolulu  
12-29-97

Comment A88: *The Honolulu office of the USFWS received a copy of the BA and cover letter dated November 6, 1997 on November 12, 1997, requesting initiation of formal section 7 consultation under the ESA. The consultation concerns the possible effects of the proposed improvement of State Route 200 on the listed and proposed species of the island of Hawai'i and designated critical habitat of the Palila. All of the information required (50 CFR 402.14) to*



*initiate consultation was either included in your BA or is otherwise accessible for our consideration and reference.*

Response: Comment noted.

*Comment A89: The ESA requires that after initiation of formal consultation, the Federal action agency make no irreversible or irretrievable commitment of resources that limits future options.*

Response: None have been made.

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U.S. Department of the Interior  
U.S. Geological Survey  
Biological Resources Division  
Pacific Island Ecosystems Research Center  
12-19-97

*Comment A90: Commenter is gratified that those associated with the project consulted extensively with biologists knowledgeable about Palila and their habitat requirements. Biologists who have spent the past nine years investigating Palila life history and limiting factors are confident that the mitigation plan is appropriate, reasonable, and complete. If implemented properly, it will very substantially enhance the recovery of Palila on Mauna Kea. Furthermore, the plan should provide considerable impetus to federal and state agencies for developing and implementing a comprehensive plan for recovering the species and its habitat elsewhere in its historical range.*

Response: Refer to FEIS - Part I, 3.18.3.

*Comment A91: Commenter suggests an alternative to the Oversight Committee. It would be more efficient and effective to contract the implementation of the plan to an independent entity, such as the Research Corporation of the University of Hawai'i (RCUH). The entity selected should be unencumbered by potential conflicts of interest with the main objectives of the mitigation plan in terms of resource management philosophies and policies. A single entity dedicated to a mandate of this complexity would be quicker to respond to changing conditions and unanticipated problems. Key stakeholders could contribute ideas to the plan in an advisory role, if this was specified in the contract.*

Response: The BO and MOU have modified the function of the Oversight Committee as originally proposed in the BA. The DLNR will retain final authority for actions on Palila replacement lands and will implement actions within their expertise as indicated by Appendix A, Table A of the MOU. The FHWA will oversee agency coordination and be responsible for ensuring that the individual mitigation tasks are implemented as guided by the principles and stipulations of the MOU.

Comment A92: *The plan provides for much needed fire management of the unique dry forest that supports Palila and many other endemic species. The plan does not exclude the public from lands intended to be managed for Palila. The plan would enhance sport hunting and other opportunities for the public to enjoy their natural resources.*

Response: Refer to FEIS - Part I, 3.9 and 3.1.1.

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U.S. Senate  
Washington D.C.  
10-29-97

Comment A93: *Commenter acknowledges receipt of DEIS for the proposed Saddle Road project.*

Response: Comment noted.

#### State Agency Responses

State of Hawai'i  
Department of Accounting and General Services  
Honolulu  
11-26-97

*No comments.*

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State of Hawai'i  
Department of Defense  
Office of the Director of Civil Defense  
Honolulu  
11-26-97

Comment A94: *State Civil Defense proposes that a communications conduit with pull boxes be included in the highway design plan. This conduit would be reserved for future State Telecommunications use.*

Response: A telecommunications conduit within the highway ROW can be accommodated. However, since its cost is not eligible for federal participation, the proposing agency would need to be prepared to fund its installation. During the design phase, the Department of Defense will be contacted to discuss this matter further.

Comment A95: *Federal and State agencies need to consider the requirement for facilities such as communications, water, telephone, and power distribution during the design process.*

Response: Requirements for communications, water, telephone and power distribution facilities are being coordinated with the utility companies. Relocations of some existing facilities will be necessary as a result of the roadway and will be the responsibility of each utility. The roadway will have sufficient ROW to accommodate various utilities as might be required in the future.

Comment A96: *No outdoor warning devices would be required as part of this application.*

Response: None are to be installed.

Comment A97: *The need for an improved highway is strongly supported. It would reduce response times for emergency vehicles and minimize their danger to emergency responders as well as public motorists using Saddle Road.*

Response: Traffic analysis of the proposed project supports this statement.

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State of Hawai'i  
Department of Health  
Deputy Director for Environmental Health  
Honolulu  
12-24-97

Comment A98: *Due to the characteristics of the soil in the area, there is a significant potential for fugitive dust to be generated during the clearing and removal of debris, grading, excavation, and reconstruction of the road. Construction activities must comply with provisions of Hawai'i Administrative Rules, Chapter 11-60.1-33 on Fugitive Dust. The contractor should provide adequate means to control dust from the road areas and during the various phases of construction.*

Response: Standard dust control measures will be implemented to reduce temporary impacts to air quality during construction activities. Water or a dust palliative will be applied as necessary to minimize particulate pollution. Areas to receive such treatment will include unpaved access roads, staging sites, and construction areas where the movement and operation of construction equipment produces airborne dust. Construction activities will comply with provisions of Hawai'i Administrative Rules, Chapter 11-60.1-33 on Fugitive Dust by incorporation of these provisions into the Special Contract Requirements.

Comment A99: *The applicant has submitted a Section 401 Water Quality Certification (AC) application for the filling of wetlands from Milepost 7 to Milepost 14. Any concerns that we may have regarding this activity will be addressed during the processing of the AC application.*

Response: The 404 and 401 permit applications within these limits have been withdrawn and will be resubmitted by HDOT during design of this segment consistent with agreement among

USACE, EPA, USFWS, and FHWA (ref: FEIS - Part III, 404(b)(1) Analysis Report and Associated Correspondence).

*Comment A100: A National Pollution Discharge Elimination System (NPDES) general permit is required for each of the following activities which discharges into State Waters: a. Discharge of storm water runoff associated with construction activities that involve the disturbance of five acres or greater, including clearing, grading, and excavation; b. Discharge of hydro testing water; and c. Discharge of construction dewatering effluent.*

Response: A NPDES permit will be acquired prior to any earthwork operations. A Best Management Practices Plan and Storm Water Pollution Prevention Plan will be provided and approved prior to commencement of construction.

*Comment A101: Activities associated with the construction of the project must also comply with the Department of Health's Administrative Rules, Chapter 11-46, "Community Noise Control." The contractor must obtain a noise permit if the noise levels from the construction activities are expected to exceed the allowable levels of the rules. Construction equipment and on-site vehicles requiring an exhaust of gas or air must be equipped with mufflers. The contractor must comply with the requirements pertaining to construction activities as specified in the rules and the conditions issued with the permit.*

Response: The Special Contract Requirements of the contract specifications will require compliance with the Department of Health's Administrative Rules, Chapter 11-46, Community Noise Control." The contractor will be required to obtain a noise permit if the noise levels from the construction activities are expected to exceed the allowable levels of the rules. The contractor will be required to comply with the requirements pertaining to construction activities as specified in the rules and the conditions issued with the permit and monitored for compliance by the project engineer on site.

*Comment A102: Heavy vehicles traveling to and from the project site must comply with the provisions of the Administrative Rules, Chapter 11-42, "Vehicular Noise Control for O'ahu."*

Response: The Special Contract Requirements will require that heavy vehicles traveling to and from the project site comply with the provisions of the Administrative Rules, Chapter 11-42, "Vehicular Noise Control for O'ahu."

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State of Hawai'i  
Department of Land and Natural Resources  
Land Division  
1-5-98

Transmittal of comments.

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State of Hawai'i  
Department of Land and Natural Resources  
Land Division  
12-3-97

Comment A102.a: The DEIS adequately identifies that a permit must be approved by the Board of Land and Natural Resources prior to the commencement of construction of any portion of the Saddle Road project within the SLU Conservation District.

Response: Comment noted.

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State of Hawai'i  
Department of Land and Natural Resources  
Land Division  
12-18-97

Comment A103: *The use of State-owned lands for any portion of the Saddle Road project including the Palila Mitigation Plan, shall require the approval of the Board of Land and Natural Resources (DLNR). Said approval will not be required if the Federal Highway Administration proposes to condemn all of the requisite State-owned lands.*

Response: A Conservation District Use Application will be submitted for conversion of Conservation District lands to right-of-way. A separate Board action will be sought to allow conservation use of agricultural lands for Palila mitigation.

Comment A104: *In addition, all State-owned lands currently under Governor's Executive Order of Proclamation for forest reserve purposes shall require a public hearing for such withdrawal. It also requires the approval of the Governor and provides for the right of disapproval by the Legislature.*

Response: Refer to response to Comment A103.

Comment A105: *For the withdrawal of a portion or the whole of any of the State-owned lands demised under any general lease, the withdrawal may be for a public purpose or for other than public use, provided, such land shall, at the time of withdrawal, constitute an economic unit for the intended purpose and that the portion of the State-owned lands not withdrawn shall also constitute an economic unit.*

Response: Refer to response to Comment A103.

Comment A106: *Section 3.18.3 Mitigation Measures discusses some of the cost of withdrawing State-owned lands from the operations of four (4) general leases to create additional Palila*

*habitats. The cost should also include the necessary professional fees for surveying, subdivision, etc.*

Response: The cost estimates for mitigation include professional fees.

*Comment A107: The Oversight Committee shall be advisory only. Should the USFWS and/or BRD/USGS desire control of the State-owned lands, said lands should be acquired by the Federal government at its fair market value and set aside to such agencies.*

Response: Refer to response to Comment A91.

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State of Hawai'i  
Department of Land and Natural Resources  
State Historic Preservation Division  
12-22-97

*Comment A108: The proposed survey of the draft archaeological inventory survey was adequate, finding a total of 16 significant historic sites. When we have had an opportunity to review the revised report we will probably agree with all of the proposed mitigation measures as outlined in the DEIS for these sites and three others located in relatively close proximity but beyond the area of potential effect. The final mitigation measures will then be stipulated in a MOA.*

Response: The Archaeological, Historic, and Traditional Cultural Assessment has been revised in close consultation with the Hawai'i SHPO office to comply with all comments received relating to cultural resources. The MOA has been executed and is contained in Part III of this FEIS.

*Comment A109: We look forward to receiving the ethnographic report on the possible traditional cultural properties outlined in Appendix A, "Indigenous Hawaiian Cultural Values."*

Response: The Supplemental Traditional Cultural Property Assessment (FEIS - Part III, Langlas 1998) was submitted by letter of September 17, 1998, reviewed by the SHPO, and approved by letter of February 3, 1999.

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State of Hawai'i  
Department of Land and Natural Resources  
Division of State Parks  
11-12-97

*Comment A110: Our Division has been working with the FHWA on the alternative alignments for the subject project. The three alignments currently under consideration for Section II are not expected to have any negative impact on the park. We assume later detailed design work will*

*include entry changes to the park road and removal of any former highway remnants bordering the park.*

Response: The entrance to the Mauna Kea State Park will be redesigned and the former highway will be removed wherever it is no longer needed. (The military will be using portions of the existing road for their training needs.) The Recommended Alternative near the park is PTA-1 and has not been altered from that presented in the DEIS.

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State of Hawai'i  
Division of Forestry and Wildlife  
Hawai'i Branch and Honolulu Administrative Offices  
Department of Land and Natural Resources  
12-16-97

*Comment A111: Na Ala Hele (Hawai'i State Trails and Access Program) has an inherent interest in the historic and prehistoric trails and trail remnants identified in the DEIS. Although the utility of identified trail remnants may be unclear, we wish to be informed on a current basis of any planned alternations or breeches of these alignments. Na Ala Hele specifically endorses the plan of avoidance of the Hilo-Pu'u O'o Trail in the vicinity of the 18 Milepost with construction of a pull-off area with signage containing locational and historical information.*

Response: Impacts and mitigation have been identified and agreed to by the Hawai'i SHPO. The precise location of alterations or breeches of these alignments will be detailed in a Treatment Plan that will be submitted to the DLNR State Historic Preservation Division (SHPD) during completion of the final design, consistent with requirements of the MOA as final design progresses. The Treatment Plan will be sent to the Na Ala Hale concurrently with its submittal to the DLNR SHPD.

*Comment A112: All attempts should be made to avoid disturbance to kipuka which contain a greater diversity of plant species than surrounding scrub 'ohi'a vegetation (much of which is designated wetland). Unfortunately, mitigative measures are deemed necessary for the wetland sections that will be disturbed even though it is the upland vegetation that is most sensitive to disturbance and is biologically most significant.*

Response: Comment noted. The high biological value of the kipuka within Section III is widely recognized. The proposed alignment avoids most direct impact to them. During the final design stage, the alignment will be altered to completely avoid most kipuka and to minimize impact to one or two that are bisected by the existing road.

*Comment A113: The maps contained within the DEIS are inadequate at the current scale. One cannot comment on potential impacts to threatened or endangered plants if it isn't clear exactly*

*where the proposed routes go. The proposed routes need to be mapped out on USGS topographic quad maps at a scale of 1:24,000.*

Response: The Plan Sheets included in the EIS are at a scale of 1:40,000 or 1 cm equals 400 m. This scale was selected to allow for a manageable review of alternatives along the entire length of the project. The maps can be enlarged by a factor of 1.67 percent if necessary to match the USGS 1:24,000 quadrangles. The location of Threatened and Endangered plants are detailed in Chapter 3 of the FEIS. No Threatened and Endangered plants were found within the survey corridor.

*Comment A114: Plant species that are considered Species of Concern are not mentioned in the DEIS. It is probable that some will be listed endangered during the course of the project, and therefore, the DEIS should make mention of these species so that the EIS does not have to be rewritten at a later date.*

Response: Plant species formally designated under the ESA as Species of Concern, as well as other rare, native plant species, are addressed in the EIS (ref: FEIS - Part I, 3.13), and further described in the associated technical volumes (ref: Char 1996 and Palmer 1997, Technical Appendices, Volume I). Species of Concern is now a term of artifact with no formal status; however, measures will be incorporated into the Special Contract Requirements to minimize impact to these species. Should species become listed that are impacted by the project prior to finalization of the EIS, a supplemental EIS addressing this will need to be prepared.

*Comment A115: The biological technical reports should be included with the DEIS because the EIS does not include enough information about location, numbers, and health of populations of rare plants for us to make well-informed comments.*

Response: Technical Volumes were subsequently sent to commenter for their review and comment.

*Comment A116: The destruction of grasslands dominated by hard-stemmed lovegrass is a significant impact that has not been addressed adequately. This ecosystem type is only found in the saddle region of the Big Island and nowhere else world-wide. We find no mention of the rarity of this ecosystem type in any of the EIS documents.*

Response: The FEIS was edited to note the uniqueness of this habitat type. It should be noted that this habitat type is not restricted to the disturbance corridor but is found over a fairly large area. The construction of paved firebreaks through a section of this habitat will help to reduce the ever present danger of an unplanned wildfire. The various proposed fire mitigation components will also further protect this resource. No special mitigation is required under the ESA, and the fire and weed mitigation proposed satisfies NEPA requirements.



*Comment A117: We find that the mitigation actions proposed to offset the actual and potential impacts of construction within Palila Critical Habitat are ambitious. While the proposed actions are needed for Palila restoration, it becomes a subjective call to balance the tradeoff between the loss of 40+ hectares of unoccupied Palila Critical Habitat and increased fire risk to the high cost of the proposed mitigation measures. The Division does realize the need to protect and restore additional habitat on the north side of Mauna Kea and elsewhere to ensure the long term survival of Palila. To lower the cost of the mitigation actions, we suggest a reduction of the overhead expenses identified and more flexibility in removing non-forested lands from existing pasture leases in the mitigation area.*

**Response:** The quantity of replacement lands and their management proposed in the Palila mitigation package were established by the USFWS in their initial letter to Okahara & Associates in October 1996 (ref: Tech. App. Vol. III, BA) and is based on the best available scientific information (Refer also to the Scientific Basis for Palila Mitigation provided in FEIS -Part I, 3.18.3.). It was originally proposed that the funding for mitigation lands funnel through the USFWS and be distributed by them to implementing sub-contractors and agencies. As a result of the revised MOU process, the stakeholder agencies agreed that monies for offsite mitigation could be appropriated through the DAR Program or the Army's EMP (ref: FEIS - Part III, MOU). Reforestation requirements do not allow postponement of pasture lease transferral to mitigation use to the dates of lease expiration.

*Comment A118: The selection of EX-2 would reduce many of the environmental concerns associated with a new alignment along PTA-1 or PTA-3.*

**Response:** As noted in Chapter 2 of the FEIS, EX-2 does not completely fulfill the project purpose and need.

*Comment A119: PTA has been grazed by cattle and more recently by wild sheep and goats (page S-12, paragraph 3). Despite this, native plant communities exist on a large proportion of the installation.*

**Response:** Numerous native plant communitives do indeed populate many areas within the PTA. Commitments have been made to prevent overt damage to these communities.

*Comment A120: Game mammals and game birds should be identified as biological resources (page S-12, Section S.5.3).*

**Response:** A list of game mammals and birds are presented in the EIS section on Wildlife, Table 3.14.2, *Mammal Species Recorded in the Project Area*, and Table 3.14.1, *Birds Detected or Expected to Occur within the Vicinity of the Project Area*. In consideration of the notable public concern regarding project impacts on hunting resources, and in an effort to minimize repetition within the document, the impacts associated with game resources and hunting are discussed in the EIS primarily under Outdoor Recreation Resources and Hunting, FEIS, 3.3.4.

Comment A121: *Segment PTA-1 would result in more of an impact than the loss of 78 ha of hunting area (page S-16, Table S.6, Summary of Impacts, Section II). A roadway through the middle of this hunting area is a major disruption to game. The No Action alternative is preferable for hunting. Loss of prime game bird habitat is difficult to replace. The improvement of access to hunting areas is not an issue in Section II. In this situation, more access may compound the existing enforcement problem of monitoring access routes.*

Response: Although the road will bisect minor habitat for game mammals and good habitat for bird hunting, there is no evidence that this division will produce fragmentation, i.e. the adverse effects to the health and stability of the game bird population. Because this area does not support a large population of game mammals, the issue of fragmentation of mammal habitat is minor. The FHWA believes, however, that adding 1,864 ha of new hunting area at Pu'u Mali amply mitigates both direct loss and any potential effects of fragmentation (ref: FEIS - Part I, 3.3.4.2, EX-2, PTA-1, and PTA-3).

Comment A122: *Most of EX-2 will not threaten vegetation or represent a fire hazard since the alignment is situated almost entirely on a younger lava flow (page S-20, Table S.6, Summary of Impacts, Section II).*

Response: If EX-2 were selected, less fire mitigation would be required as some of the alignment (approximately 31 percent) traverses a lava field with little vegetation. However, 69 percent of the alignment is within vegetated areas which have a higher fire potential.

Comment A123: *Any route other than EX-2 on the eastern side of Mauna Kea State Park will have adverse effects on hunting, soils, vegetation, fire control, birds, mammals, and invertebrates.*

Response: Any of the three sections under consideration within Section II will have impacts on soils, vegetation, fire control, birds, mammals, and invertebrates. All direct and secondary impacts that will result from the construction of the Recommended Alternative will be mitigated so that, on balance, PTA-1 is the best alternative from the standpoint of completely fulfilling the purpose and need.

Comment A124: *Palila mitigation actions are not necessary and there would be less impact if EX-2 is chosen for Section II (page S-24, S.8, paragraph 1, last line; and page 2-4, 2.2.1, line 3).*

Response: Mitigation measures related to the Palila will also be required with the selection of EX-2, while the level or degree of mitigation requirements would likely be reduced in comparison with that of PTA-1 or PTA-3.

Comment A125: *It is incorrect to state that there would be limited impact to hunting of feral animals with PTA-1 or PTA-3 (page 307, 3.1.1.2, paragraph 8, line 3). Game animal*

*populations presently exist along these proposed alignments and would be displaced. Game bird hunting areas would also become seriously fragmented. These routes run through some of the best wildlife habitat at PTA.*

Response: Hunter reported data from PTA for 1996 indicate that only seven sheep and three pigs were harvested from the Humu'ula section of PTA, a large unit that includes the area to be bisected by the road. This is less than 6 percent of the total number of sheep harvested from PTA and less than 8 percent of pigs. In comparison to other areas of PTA (Bobcat - 58 sheep; Kapele 13 pigs) and particularly to State hunting units (Pu'uana'hulu - 113 sheep; Unit B - 243 pigs), these are not substantial harvest numbers. Discussions with hunting officials indicate that 1996 was a fairly representative year in terms of proportions of game mammals taken within various units. It should be emphasized that under no alternative would the road impact more than 91 ha (224 acres) (including safety zones) of the Humu'ula Unit. Although the road will bisect minor habitat for game mammals and good habitat for bird hunting, there is no evidence that this division will cause "serious" fragmentation. Many hunters report excellent hunting in areas near the Saddle Road, Mauna Kea State Park, and other disturbed areas in this unit. Game bird experts do not believe that highways on the scale proposed for the Saddle Road pose serious obstacles to game bird movement.

Comment A126: *Unit G should include archery and firearms (muzzle loader) under the Resource/Arms Permitted column (Table 3.3.9).*

Response: Table corrected in FEIS to reflect archery and firearms for Unit G.

Comment A127: *On page 3-46, third paragraph, sentence should read "In summer of 1997, DLNR initiated a program intended to reduce sheep numbers below 150 animals.*

Response: Text corrected in FEIS as noted.

Comment A128: *Hunting has not been lost in the Laupahoehoe, Kahaualea and Put Makaala Natural Area Reserves (page 3-48, fifth paragraph). However, the management goal for feral mammals has changed from sustained yield to liberal hunting. The kulani Buffer Zone is open for hunting throughout the year by permit only. Game mammal hunting has been lost, however, on the Mauna Kea Forest Reserve and Ka'ohe Game Management Area due to Federal Court eradication orders.*

Response: The FEIS reflects the recent history of management changes in hunting area as clarified by commenter.

Comment A129: *Mauna Kea Forest "Preserve" should be changed to Mauna Kea Forest "Reserve" (page 3-48, sixth paragraph, last sentence).*

Response: Text corrected in FEIS.

Comment A130: *It would be important to note that fire hazard and threat to Palila Critical Habitat would be greatly reduced if this route were chosen.*

Response: It is unclear which alternative is being referenced.

Comment A131: *On page 3-136, first paragraph, last sentence, "olopa" should be "olapa."*

Response: Text corrected in FEIS.

Comment A132: *It is important to note that PTA-1 and PTA-3 would present the greatest fire threat to native forest and Palila Critical Habitat (page 3-149, 3.14.1.2, PTA-1 and PTA-3).*

Response: The extensive fire mitigation proposed in the mitigation package with the selection of PTA-1 or PTA-3 will greatly reduce the fire hazard within this upland xeric habitat. It is believed that the fire risk without the proposed improvements would be greater due to an increase in traffic to 4,000 ADT without any protective paved shoulders.

Comment A133: *The Clermontia peleana is located not more than 10 to 12 m away from the existing road near the 14 milepost (page 3-174, sixth paragraph). We are concerned that this species will be either directly or indirectly affected by construction activities in this area unless this stretch of road is rerouted.*

Response: The *Clermontia peleana* located near MP14 is approximately 237 m north of the proposed ROW. Although the FHWA does not feel that this project will result in any deleterious impacts to this plant, they have agreed to implement several measures to reduce the potential for impacts to this endangered species (ref: ltr. from HDOT to FHWA dated March 31, 1998, and from FHWA to USFWS dated April 7, 1998, FEIS - Part I, 9.4).

Comment A134: *It is important to note that the listed mitigation measures (page 3-179, 3.18.3, paragraph 3) and related costs will be necessary only if PTA-1 or PTA-3 are chosen.*

Response: It is difficult to specifically identify the mitigation measures that would be required for the implementation of EX-2 because Section 7 consultation has not been undertaken on behalf of this alternative segment. It is assumed, however, that a substantial part of the mitigation proposed for PTA-1 or PTA-3 would be required with selection of EX-2. It is probable that all of the fire control measures, weed control, and alien species mitigation would be required for EX-2.

Comment A135: *Effort to monitor and control alien species, pests, and predators will be initiated by DOFAW under their Palila restoration program not by the USFWS (page 3-180, third paragraph).*

Response: The Palila MOU identifies mitigation tasks and agreed upon agency responsibilities (FEIS - Part III).

Comment A136: *We are not convinced that a 3 m set-back from the proposed road EX-3 for *Plantago hawaiiensis* will be sufficient to safeguard this species survival (page 3-182, first paragraph).*

Response: The text in the EIS will be corrected to reflect the information in the BA and BO. The population of *Plantago hawaiiensis* located along EX-3 is in fact located 18 m north of the survey corridor boundary, the actual limits of construction will be much narrower than the 60 m survey corridor (40 to 50 m ROW). Additionally this population is sited on an upraised Pahoehoe shelf that will be off limits to construction personnel and equipment (ref: FEIS - Part III, BO). This places the population 20 to 30 m from all disturbance.

Comment A137: *On page 3-219, Abandoned Roadway Segments, who will provide planting materials? Will native species be utilized? If so, seed or cuttings of native species from the area should be collected and propagated prior to realignment so that an adequate supply of native plant species will be available.*

Response: The EIS was revised to include specific design and on-site BMPs to avoid, minimize, and restore adverse impacts to communities that contain jurisdictional wetlands. These practices provide for preserving and restoring the native vegetation on sites disturbed during construction and reclamation of abandoned roadway segments. Observations of the vegetation dynamics within Section III at disturbed sites associated with HELCO power transmission lines indicate that the native vegetation normally reclaims disturbed areas if access is restricted. The primary method for restoring disturbed areas in high rainfall areas is generally recognized as assisting native vegetation to reestablish by monitoring and removing alien plants, especially trees or shrubs that have the potential to prevent this natural restoration.

#### Technical Appendices - Volume III - BA

Comment A138: *Alternative EX-2 should be discussed also on page 15, Section II, line 1. The impression given in this paragraph is that there are only two alternatives. Alternative EX-2 is shown in DEIS as the least environmental impact alternative.*

Response: The BA is the primary document used in a federal section 7 consultation under the ESA of 1973 as amended. FHWA has not to date initiated a section 7 consultation for this alternative, and will not, unless both PTA -1 and PTA-3 drop from further consideration, since the SEE team has identified PTA-1 as the segment that best meets the terms of the purpose and need outlined in the DEIS.

Comment A139: *On page 15, "Pohakaloo" should be changed to "Pohakuloo."*

Response: Error noted. BA will not be reprinted.

Comment A140: *On page 26, first paragraph, line 8 should read "...would allow mamane to be reestablished over a range of recovering Palila habitat....Palila may or may not become established in this area even with land acquisition or management of the habitat.*

Response: Corrections have been made to the FEIS to express this possibility (ref: FEIS - Part I, 3.18.3, Scientific Basis for Palila Mitigation).

Comment A141: *Pages 30 and 31 are missing from Technical Appendices Volume II.*

Response: Upon notification of the error, copies of the missing pages were forwarded to DLNR.

Comment A142: *On page 30 of the BA, second paragraph, the BA proposes that management of the state lease lands be managed by DOFAW with an Oversight Committee consisting of representatives of USFWS and BRD/USGS. Tables 7 and 8 indicate that the USFWS would receive a 25 percent overhead fee for implementing the various mitigation projects. DLNR as the land owner is the appropriate agency for contracting out specific work items to BRD/USGS or other parties as needed to implement the plan. Further, we recommend that DLNR or a third party, non-profit entity administer funds for the mitigation actions. This would save in excess of \$1,288,350 to the funding agency over the next five years. DLNR would not add a 25 percent overhead for managing the project, but would contract out jobs and require overhead on limited items such as positions added to the Division personnel counts.*

Response: The revised Palila MOU specifies mitigation principles and responsibilities of the signatory agencies, including DLNR (ref: FEIS - Part III, MOU).

Comment A143: *On page 30 of the BA, third paragraph, the Division feels that the current level of detail contained in Volume III and set forth in the Appendices B, C and D are more than adequate to guide mitigation implementation. Specific management strategies for the areas can be completed later by the Oversight Committee.*

Response: Refer to response to Comment A142 and Comment 151.

Comment A144: *On page 39 of the BA, paragraph 2, "threastened" should be "threatened."*

Response: Error noted. BA will not be reprinted.

Comment A145: *On page 43 of the BA, Table 10, "Cytandra" should be Cyrtandra."*

Response: Error noted. BA will not be reprinted.

Comment A146: *On page 49 of the BA, a pre-emergent herbicide should be sprayed along road cuts to keep fountain grass at a minimum. Monitoring for fountain grass should be scheduled at least every 3 months, not every 4 months.*

Response: Monitoring for fountain grass will be scheduled at least every three months as suggested by commenter (ref: FEIS - Part I, 3.18.3).

Comment A147: *On pages 58-62 of the BA, Appendix A is missing page 62.*

Response: Page 62 of Appendix A to the BA is included in Part III of the FEIS under ERRATA SHEET - BA.

Comment A148: *On page 68 of the BA, first bullet, first sentence should read "The area shall be closed to gamebird hunting if in the opinion of DOFAW the risk of unplanned fire ignition is too high to warrant the risk. The mitigation area should not be managed any differently than the adjacent Mauna Kea Forest Reserve regarding hunting seasons and closures for fire hazard. DOFAW will determine when hunting season is opened or closed.*

Response: At issue here is the management of an endangered species which has triggered this extensive mitigation. It has unequivocally been stated in the Palila mitigation package that the primary goal of the proposed management on the three parcels of Palila replacement lands shall be the restoration of mamane forest and the translocation and expansion of the Palila population. All actions, including access to the managed lands, shall be guided by this primary goal as stated in the MOU and agreed upon by signatory agencies, including DLNR (ref: FEIS - Part III).

Comment A149: *On page 68 of the BA, who will be responsible for monitoring the data collection for Palila mitigation?*

Response: The monitoring and data collection will be the responsibility of the implementing agencies with the coordination oversight of FHWA as specified in the MOU.

Comment A150: *On page 69 of the BA, first paragraph, "Mamane will be the dominate...." The word dominate should be changed to dominant.*

Response: Error noted. BA will not be reprinted.

Comment A151: *On page 75 of the BA, second paragraph, this paragraph should note that the Oversight Committee is advisory in nature and has no authority over DOFAW's management decisions on state lands.*

Response: As a result of consultation with the various stakeholder agencies, the concept of an Oversight Committee was modified. The FHWA will oversee agency coordination and be responsible for ensuring that the individual mitigation tasks are implemented as specified in the MOU.

Comment A152: *On page 77 of the BA, second bullet, first sentence, same as above.*

Response: Refer to response to Comment A151.

Comment A153: *On page 77 of the BA, third bullet, last sentence should read "In the event that they are unsuccessful, DLNR shall conduct a staff hunt as needed to attain the goals of mamane forest restoration."*

Response: As specified in the MOU, DLNR will maintain management authority on Palila replacement lands and actions will be guided by mitigation principles specified therein.

Comment A154: *Page 88 of the BA needs editing.*

Response: Error noted. BA will not be reprinted.

Comment A155: *Page 89 needs editing.*

Response: Error noted. BA will not be reprinted.

Comment A156: *Saddle Road should be adequately posted with Smokey Bear fire prevention signs.*

Response: Refer to response to A42 and FEIS - Part I, 3.9.3 for new fire signage requirement.

Comment A157: *The PTA Fire Department should maintain two fire hazard/risk signs along the Saddle Road, one in the east section and one in the western section of the training area. These signs should be based upon the National Fire Danger Rating System. Daily updating of sign information would be required to maintain public confidence in the system.*

Response: PTA will install and maintain signs at each boundary of the training area and additional fire advisory signs will be installed at planned pullout and parking areas throughout the project as warranted.

Comment A158: *All vacant firefighter positions at the PTA Fire Department should be filled.*

Response: FHWA will initiate dialog with USAG-HI over the timing of their implementation of the new PTA fire Plan. PTA currently has 13 positions filled in the firefighting unit and is currently in the process of filling all remaining positions. Refer to response to Comment A42.

Comment A159: *Helicopter crews, trained for high elevation water bucket operations, should be available at all times in the event of a fire.*

Response: There are no fire fighting helicopters permanently stationed at PTA. When lift helicopters are training at PTA, they bring water buckets and are available for fighting fires. Both the County of Hawai'i and the National Guard have lift helicopters capable of fighting fires. There is a fire fighting MOA between the County and PTA where they can request support from



each other. PTA is responsible for fighting fires within PTA and will ask the County for support when necessary. The County has primary responsibility for fires outside of PTA but will ask PTA for support when necessary. PTA has installed eight, 80,000-gallon dip tanks. These tanks are used by the County to fight fires. PTA personnel assist the County helicopters by removing and replacing the tank covers as necessary. The dip tanks greatly reduce the transit time for fighting fires in the Saddle Road area. Before the tanks were installed, the helicopter crews had to fill their water buckets in the ocean, a minimum, 20 minute trip.

*Comment A160: Bulldozers stationed at PTA should be immediately available in the event of a fire.*

Response: PTA has one bulldozer and one grader permanently stationed at PTA. Both are immediately available to fight fires on notice. Refer to response to Comment A42.

*Comment A161: Existing access roads leading into the Ka'ohē GMA and Mauna Kea Forest Reserve should remain open for wildfire control.*

Response: There are no plans to close either of these access routes.

*Comment A162: Care should be taken to prevent the spread of fire prone vegetation, such as fountain grass, during highway construction.*

Response: Mitigation measures were developed to minimize alien plant introduction and proliferation (ref: Section 3.18.3 Mitigation Measures, All Action Alternatives).

*Comment A163: The development of fire models for Mauna Kea and PTA vegetation would help fire fighters predict fire behavior.*

Response: As part of the project mitigation, a high-altitude, xeric-plant community fire ecologist will be contracted to model the various components involved in unplanned wildfires for these habitats and develop contingency plans for suppression and a fuels management plan.

*Comment A164: In Volume V, Social Impact Assessment, page 2-11, Table 2.6, and in Impacts to Hunting, page 6, Table 2-1, Unit G should indicate archery and firearms (muzzle loader) under the Resource/Arms column.*

Response: The FEIS, Table 3.39, has been modified as noted.

*Comment A165: Page 10, first paragraph, last sentence should read "In summer of 1997, DLNR initiated a program intended to reduce sheep numbers below 150 animals."*

Response: Text corrected in FEIS as noted by commenter (ref: FEIS - Part I, 3.3.4.1).

*Comment A166: Page 11, first paragraph, second sentence should be corrected. Hunting has not been lost in the Laupahoehoe, Kahaualea and Put Makaala Natural Area Reserves. The management goal for feral mammals, however, has changed from sustained yield to liberal hunting. The Kulani Buffer zone is open for hunting throughout the year by permit only. Game mammal hunting has been lost, however, on the Mauna Kea Forest Reserve and Ka'ohe Game Management Area due to Federal County eradication orders.*

Response: The FEIS reflects the recent history of management changes in hunting area as clarified by commenter.

*Comment A167: The mitigation plan and proposed Resource Management Guidelines for the Pu'u Mali area should be more flexible in the time line and how the state pasture leases are converted into conservation status. If provided the flexibility, the Department may be able to work with the lessees to provide a transition that protects the most important areas with forest cover and allows lessees to continue to use badly degraded and marginal portions if necessary until the leases terminate in 2007. The Department will commit to putting these parcels into forest reserve status as soon as possible and use reforestation as a means to jump start forest regeneration on parcels retained in grazing longer. This approach may be less costly than a mid-term withdrawal with high reimbursement costs and achieve the desired habitat restoration within a slightly slower but adequate time line.*

Response: Discussions of timing of lease withdrawals and reimbursement options are currently ongoing among the FHWA, DLNR, and lessees. The details and timing of the lease withdrawals will be finalized prior to issuance of the ROD.

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State of Hawai'i  
Office of Environmental Quality Control  
11-12-97

*Comment A168: According to EIS rules, all comments received on the EIS Preparation Notice and the responses must be included in the EIS. Based on our records, two comment letters (enclosed) were not included in the EIS. Please include all comment letters and responses in the EIS. Also, please send the DEIS to the two commenters.*

Response: Letters transmitted by OEQC were received in response to Preparation Notice, not DEIS. These two letters and all other required letters have been included in the FEIS (ref: FEIS - Part II, 1.4.3). Copies of the DEIS were made available for public review at a number of public libraries and government offices. NEPA, Council on Environmental Quality Regulations, and FHWA policy do not require that copies of the DEIS or FEIS be given to all commenters.

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State of Hawai'i  
Office of Environmental Quality Control  
12-23-1997

Comments A169: *Please describe any plans for lighting the roadway. If lighting is planned, please describe the potential impacts and mitigation measures.*

Response: No continuous or spot roadside lighting is proposed, except the replacement of any existing lights that would require relocation in the vicinity of the PTA.

Comments A170: *As a separate project, the Department of Army is proposing to lengthen Bradshaw Army Airfield. The longer runway would allow planes from further distances to land at the PTA. Planes arriving from new locations will likely introduce alien pest species. The improved roadway and the additional traffic will also increase the opportunity for alien pest species to spread into native habitats in the area. What is the cumulative impact of the runway extension and highway expansion on the alien pest species problem? What mitigation measures are planned to reduce alien species threat? For more information about potential mitigation measures, please refer to section 8 of the Kahului Airport Alien Species BA (enclosed).*

Response: The DEIS and the FEIS (ref: FEIS - Part I, 6.0) include a discussion of the incremental impacts of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time. Because of its restriction to military aircraft only and in conjunction with training exercises, the proposed extension of the Bradshaw Army Airfield runway would not be considered to contribute to cumulative impacts. This airfield will be used in a specified manner by the PTA regardless of the improvement status of Saddle Road. Any extension of their airfield at PTA and potential alien species problems as a result of this action would be addressed by USAG-HI during the environmental documentation stage of that project. For discussion of alien species mitigation, refer to response to Comment A39.

Comment A171: *The project hopes to avoid using any outside fill to minimize the introduction of alien pest species. In the event that additional fill from outside areas is required, what are the proposed mitigation measures to reduce the introduction of alien pest species?*

Response: During the final design phase a concerted effort will be made to design this segment to balance earthwork quantities so that no outside fill sources will be needed. Should the need arise for fill to be imported from off site, every attempt shall be made to select local borrow sites that do not contain alien species and to sterilize the fill. Monitoring for alien species will be done during and after construction and measures will be taken to eliminate any alien species found.

Comment A172: *The increase in traffic will elevate noise levels. The noise study in the EIS focuses on sensitive "human" receptors such as homes and barracks. What are the impacts to sensitive "wildlife" receptors (such as bird nesting or breeding areas) near the highway corridor?*

Response: It has been stated by biologists that the principal noise and disturbance impacts to faunal resources will be during construction and will be of a temporary nature.

Comment A173: *New and replacement bridge and culvert crossings will be constructed across various streams. Please describe the impacts of the project on the affected streams. The discussion should include impacts to drainage, streamflow, water quality, and aquatic biology.*

Response: These impacts and designs will be described in detail in any 404 and 401 permits required as well as other required plans as the project progresses to final design. Bridge and culvert crossings will be designed to provide stream flow characteristics which match those of existing conditions to the extent possible. A National Pollution Discharge Elimination System permit which includes a Best Management Practices Plan and Storm Water Pollution Prevention Plan will be required. Soil erosion and sediment control measures including silt fences, rip rap, check dams and other measures will be designed to minimize impacts to water quality. Special aquatic sites (wetlands) have been identified in Sections III and IV and are discussed in detail in the 404(b)(1) report and associated correspondence (FEIS - Part III).

Comment A174: *The proposed roadway improvements will open up the area (including the summit of Mauna Kea) to tourists. Presently, there is a major concern that the summit may be overused by various parties. How will the increase in the number of tourists impact the management of the Mauna Kea summit?*

Response: After the DEIS was completed, the FHWA conducted a survey of recreationalists, workers, and others who currently drive on the Mauna Kea Access Road in order to determine what effect improvements to Saddle Road might have on usage patterns. In general, a minor number of users (12 percent) reported that although the current condition of Saddle Road was not a major factor in their decision to make the trip, they would probably visit Mauna Kea more frequently if the Saddle Road were improved. It has been determined by DLNR and agreed upon in the Section 106, NHPA MOA that these effects will be indirect and more properly handled by the University of Hawai'i, Institute for Astronomy during their Section 106 investigation of management strategies for the summit area (ref: FEIS - Part I, 3.19.3.1.3 and Part III, Terry 1998 and MOA).

Comment A175: *Segments PTA-1 or PTA-3 would realign Saddle Road to the northern boundary of the PTA. This alignment would reduce conflict between the roadway and PTA training areas. On the other hand, this alternative increases the impact to the Palila Critical Habitat. Please consider other options, including but not limited to land exchanges and a combination of the PTA-1 (west segment) and EX-2 (east segment), that could simultaneously*

*achieve the multiple goals of improving the roadway, enhancing PTA training activities and reducing impact to the Palila Critical Habitat.*

Response: Subsequent to the public hearings and receipt of agency comments, an optional alignment was preliminarily investigated that would eliminate all taking of Critical Habitat by relocating PTA-1 east of PTA to the southern exterior of the Critical Habitat and connecting to EX-2 south of Mauna Kea State Park. While this alignment appeared to be a viable one, it did not completely fulfill the purpose of and need for the proposed project. This alignment modification was not investigated further because Section 7 Consultation with USFWS resulted in a "no adverse modification" opinion for the recommended alternative PTA-1 based on mitigation proposed.

*Comment A176: The proposed project will improve access to the vast tracts of undeveloped areas including lands owned by the Department of Hawaiian Homes Land and Parker Ranch. What is the potential for urban and commercial development of the surrounding area with the project?*

Response: The Saddle Road Project will extend through large tracts of land owned by Parker Ranch and the DHHL. In addition, the majority of the land along the project corridor is under control of the DLNR and is within the Conservation District. Even with the Saddle Road project, however, there is limited potential for urban and commercial development within these areas. Refer to the discussion of Parker Ranch, Public/Other Lands, and the DHHL in the FEIS (Part I, 3.1.1.1.1, 3.1.1.1.4, and 3.1.1.1.9). The improved road will enhance DHHL planned development on their lands.

*Comment A177: Please include in the summary section the following: 1) Unresolved issues; 2) Compatibility with land use plans and policies; 3) Listing of permits and approvals.*

Response: A discussion of unresolved issues, project compatibility with land use plans and policies, and a listing of permits required has been included in the FEIS (ref: FEIS - Part I, Executive Summary) as requested.

*Comment A178: Please include a list of the unresolved issues and discuss how such issues will be resolved before the project is implemented.*

Response: Refer to response to Comment A177.

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State of Hawai'i  
Office of Hawaiian Affairs  
Honolulu  
12-19-97

Comment A179: *The Office of Hawaiian Affairs (OHA) has no concerns with the adequacy of the DEIS document. OHA finds the DEIS to be very well prepared and comprehensive in terms of information presented. It explores in considerable detail several alternatives which meet the proposed project's objectives while not singling out one as the preferred.*

Response: Comment noted.

Comment A180: *OHA recognizes that the continued deterioration of Saddle Road is a major transportation and public safety issue and that the improvements are necessary. However, OHA has several concerns regarding potential adverse impacts of the project on the surrounding environment, associated primarily with the alternative routes proposed for the PTA. OHA has concerns regarding the selection of PTA-1 or PTA-3, which would produce serious adverse impacts upon the environment. They would directly affect Palila Critical Habitat. The greatest adverse impact of alternatives PTA-1 and PTA-3 is the creation of disturbance corridors which will facilitate the introduction and proliferation of alien plant species in forested areas currently dominated by native species. The problem with the proposed mitigation measures is that they rely upon the successful establishment of future man-made replacement Critical Habitat. OHA has serious concerns about jeopardizing existing Palila Critical Habitat (consisting of a stable native Mamane climax community) for the placement of a new road alignment. EX-2 appears to be more environmentally acceptable. It presents a significantly reduced risk of future invasion of alien plant species to the area and it totally avoids any loss of Palila Critical Habitat. Because alternative EX-2 does achieve both the objective of increasing public safety and increasing the quality of military maneuvers on this portion of Saddle Road, OHA would not support alternatives PTA-1 or PTA-3.*

Response: The selection of either PTA-1 or PTA-3 will have environmental impacts, and will modify Palila Critical Habitat, this is clearly stated in all the documents in circulation. The substantial amount of Palila and other biological mitigation proposed has been designed by biologists at the USFWS and BRD/USGS to be sufficient to offset both the modification of Palila Critical Habitat, and the potential for the further spread of alien species. The concerns voiced over the mitigation proposed to offset the modification of existing Palila Critical Habitat are ones that biologists crafting the mitigation plan took into account when drafting the plan. The plan does not look to replace or improve approximately 120 acres of mamane habitat which will be modified by the construction of either PTA alignment, but rather proposes to reforest 5000 acres which abuts a high quality mamane forest on the north slope of Mauna Kea, enhancing approximately 2000 acres of mamane forest immediately adjacent to the core Palila population center, and managing an additional 3000 odd acres in Kipuka 'Alala within the PTA primarily

for the regeneration of mamane forest. This three pronged approach ensures that even if one of the reforestation and regeneration attempts fails there will still be a net gain in high quality, low-access mamane forest preserved and enhanced on Mauna Kea and within the saddle area. The area of Critical Habitat through which PTA-1 passes has already been seriously impacted by alien species due to its use for hunting, hiking, camping, off-road vehicles, and other public access impacts. The scientific basis for this mitigation is presented in the FEIS - Part I, 3.18.3, Scientific Basis for Palila Mitigation). The FEIS presents the basis for concluding that EX-2 would not fully satisfy the project purpose and need and, consequently, why it was not selected as the Recommended Alternative (ref: Part I, 2.5).

*Comment A181: On page 3-63, statement that "Native Hawaiians were creatures of the land and relied on the environment as a lifeline," should read "Native Hawaiians are people whose daily life and culture are rooted in and integrated with the surrounding natural world.*

Response: The referenced statement was taken directly from a report prepared for this project by Native Hawaiian leaders entitled "Indigenous Hawaiian Cultural Values." This sentence is consistent with the tone and presentation of the report as created by the authors.

*Comment A182: OHA considers the DEIS to be comprehensive and detailed in both the Archaeological, Historic, and Traditional Cultural Assessment (Appendix IV), and the Indigenous Hawaiian Cultural Values Assessment (Appendix V). The inclusion of a traditional and spiritual Native Hawaiian perspective on the environment, and interviews conducted with Native Hawaiians greatly enhances the informational value of the DEIS.*

Response: Refer to FEIS - Part I, 3.3.8 and 3.19.

*Comment A183: OHA concurs with the DEIS that an archaeological monitor and a cultural monitor should be present during all construction activities.*

Response: Monitoring activities will be built into Data Recovery and Treatment Plans as warranted and only at the locations required by SHPD. The MOA specifies the approval process for these plans. Monitoring activities are not warranted and will not be present during all construction activities.

*Comment A184: OHA suggests that the DEIS mitigation measures include a provision that inadvertently unearthed burials be referred to the Hawai'i Island Burial Council immediately.*

Response: The FEIS indicates the state approved appropriate actions to be taken should burials be inadvertently encountered during road construction. These actions are also described explicitly in the accompanying Memorandum of Agreement and will be included in the Special Contract Requirements.

Comment A185: *OHA notes that the surrounding communities are in agreement that improvements to Saddle Road are a necessity and support the proposed action. However, certain factions of the community have expressed concerns over some of the alternative segments proposed. Concerns and opposition to PTA-1 and PTA-3 have been expressed by the hunting community and native Hawaiian homesteaders. These alternatives would directly impact Unit E, Omaokoili, which is considered by many local hunters to offer superior hunting. The concern among native Hawaiian homesteaders is the direct loss of approximately 13 ha of Hawaiian Homelands if PTA-1 is implemented. Table S.6 (page S-16) does not indicate that these are Department of Hawaiian Homelands (DHHL) which will be lost under alternative PTA-1. The fact that PTA-3 would avoid placing a new roadway on DHHL lands altogether (page 2-7) should be made clear to the Homesteaders and the native Hawaiian community as a whole.*

Response: The selection of PTA-1 would require the acquisition of 15.43 ha of DHHL lands. Impacts associated with DHHL lands are further clarified in the FEIS (Part I, 3.1.1.1.9).

### County Agency Responses

County of Hawai'i  
Advisory Committee on Bicycle and Pedestrian Safety  
Hilo  
12-22-97

Comment A186: *Committee generally approves the well-paved shoulders since they will encourage bicycle traffic and improve bicyclist safety. However, in our opinion, 8-foot wide shoulders are the maximum desirable width. Wider shoulders can become defacto traffic lanes, facilitating illegal, high speed, passing on the right by impatient motorists. This creates a serious hazard to bicyclists and pedestrians using the shoulders.*

Response: As described in FEIS, Section 2.1, the standard typical section for the proposed Saddle Road improvements would incorporate two 3.6-m (12-foot) travel lanes, and two 2.4-m (8-foot) paved shoulders. Within a portion of the project corridor more vulnerable to fire hazards, an additional paved firebreak would be constructed outside of the roadway shoulders. Between the paved shoulders and the paved firebreak, a four-strand smooth wire fence with metal posts would be constructed to a height of 1.2 m. This fence will prevent vehicles from using the paved firebreak as defacto traffic lanes.

Comment A187: *We recommend that 18 X 0.25 inch recessed rumble strips be applied to the shoulders immediately. These have proved to be very helpful on the shoulders of Highway 19. They alert errant motorists to the fact that they are drifting out of the traffic lane and onto the shoulder. Bicyclists fatalities and numerous serious crashes on the Big Island have been caused by inattentive motorists drifting onto shoulders and hitting bicyclists.*



Response: Parallel rumble strips outside of the travel lane and adjacent to the travelway edge striping or other audible delineation markers such as raised pavement markers will be added in the final design as safety considerations warrant in specific instances. It should be noted that these strips can present a hazard to bicyclists using the roadway shoulder during turning movements. Raised reflective pavement markers along centerline and edge striping will be installed where warranted to further increase the safety of motorists, cyclists, pedestrians, and equestrians. While Saddle Road will not be designed to accommodate bicycle, pedestrian, or equestrian use separately from the travelway and shoulders, the wide shoulders (2.4 m) and clear zone outside of the shoulders will afford safer operating conditions for cyclists and other non-motorists who chose to use the route. In addition, travel lane paving and cross-slope (2 percent) will remain the same across the road surface from centerline to edge-of-shoulder.

Comment A188: *We approve of making the fire-break a bicycle path. Appropriate signage should encourage this use. The bicycle path would likely be used occasionally by pedestrians, roller bladers, and other non-motorized users. Given its isolated location, we expect relatively low volumes of non-motorized traffic, and multi-use of the bicycle path would not cause user conflicts.*

Response: Through much of the PTA, Section II, the typical roadway cross section will be expanded to incorporate a 2.4-m wide paved firebreak to be located outside of and adjacent to the roadway shoulder, on one or both sides of the roadway. The design of this firebreak will not be guided by bicycle path standards, therefore, signs or markings depicting it as such are not recommended. However, appropriate signing and other means of encouraging its use by cyclists, rather than the travel lane or adjacent shoulder, will be installed.

Comment A189: *We suggest that rest stops with covered shelters, toilets, and potable water be located at approximately the 3,000 foot and the 66,000 foot level on both the east and west sides of the saddle. This would refresh and re-supply bicyclists traveling over the saddle. Rest stops at 3,000 feet should also permit overnight camping. This will help bicyclists unable to make it to the Mauna Kea State Park at 6,500 feet, and will break their journey into two more manageable parts over two days.*

Response: Pullouts and/or parking areas will be included in the final design by HDOT at locations determined to warrant these facilities from a safety, visual, historical, or biological interest consideration. Restroom or rest stop facilities are not planned at these locations.

Comment A190: *Solar powered emergency phones should be installed every few miles.*

Response: Emergency phones will be installed approximately every 2.0 km within Section II in accordance with HDOT installation policy.

Comment A191: *Waianuenue Avenue is not friendly to motorists or bicyclists with its substandard narrow traffic lanes and heavy traffic volumes. Therefore, we recommend*

Response: Parallel rumble strips outside of the travel lane and adjacent to the travelway edge striping or other audible delineation markers such as raised pavement markers will be added in the final design as safety considerations warrant in specific instances. It should be noted that these strips can present a hazard to bicyclists using the roadway shoulder during turning movements. Raised reflective pavement markers along centerline and edge striping will be installed where warranted to further increase the safety of motorists, cyclists, pedestrians, and equestrians. While Saddle Road will not be designed to accommodate bicycle, pedestrian, or equestrian use separately from the travelway and shoulders, the wide shoulders (2.4 m) and clear zone outside of the shoulders will afford safer operating conditions for cyclists and other non-motorists who chose to use the route. In addition, travel lane paving and cross-slope (2 percent) will remain the same across the road surface from centerline to edge-of-shoulder.

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Response: Through much of the PTA, Section II, the typical roadway cross section will be expanded to incorporate a 2.4-m wide paved firebreak to be located outside of and adjacent to the roadway shoulder, on one or both sides of the roadway. The design of this firebreak will not be guided by bicycle path standards, therefore, signs or markings depicting it as such are not recommended. However, appropriate signing and other means of encouraging its use by cyclists, rather than the travel lane or adjacent shoulder, will be installed.

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Response: Pullouts and/or parking areas will be included in the final design by HDOT at locations determined to warrant these facilities from a safety, visual, historical, or biological interest consideration. Restroom or rest stop facilities are not planned at these locations.

Comment A190: *Solar powered emergency phones should be installed every few miles.*

Response: Emergency phones will be installed approximately every 2.0 km within Section II in accordance with HDOT installation policy.

Comment A191: *Waianuenue Avenue is not friendly to motorists or bicyclists with its substandard narrow traffic lanes and heavy traffic volumes. Therefore, we recommend*

*consideration of an alternative connection into Hilo to minimize additional traffic on Waianuenue, perhaps via proposed extension of Puainako Street.*

Response: The extension of Puainako Street is currently being planned as a separate project. As planned, Section IV of the Saddle Road project would connect to the Puainako Street extension.

*Comment A192: We support expanded express Hele-On bus schedules over the Saddle Road, linking Kailua-Kona and Hilo. We are appreciative of the capacity of these buses to carry bicycles and suggest that future schedules accommodate multimodal commuters in both directions.*

Response: The geometric design of the improved roadway will allow transit buses to operate within the traffic stream at a very efficient level of service. ROW widths will be sufficient to accommodate future expansion to a 4-lane facility which could include use of select lanes for special purpose, peak hour transit, or HOV operations should passenger demand and public sentiment require. The currently proposed project will support increased commuter bus service operations; however, public demand and potential revenues therefrom will determine the feasibility of expanded express Hele-On bus schedules.

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County of Hawai'i  
Department of Research and Development  
Hilo  
12-8-97

*Comment A193: County of Hawai'i, Department of Research and Development, supports the proposed project because it will provide a safe and efficient route to both sides of the island as well as to points between, e.g., Waimea.*

Response: Refer to FEIS - Part I, 3.4.3 and 3.4.4.

*Comment A194: Improvements to Saddle Road will contribute to the economy via savings of time and fuel for commuters; and more significant may be the savings in cost of transportation of materials, fuel, and other products to west Hawai'i.*

Response: Refer to FEIS - Part I, 3.4.

*Comment A195: An improved Saddle Road would allow considerable flexibility to visitors, increasing accessibility to the saddle area.*

Response: Refer to response to Comment A174.

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County of Hawai'i  
Department of Water Supply  
Hilo  
12-26-97

*Comment A196: The Department maintains existing 8 and 16-inch waterlines along Kaumana Drive within the scope of the proposed project from Country Club Drive to our 300,000-gallon concrete reservoir adjacent to Kaumana City Subdivision. We defer comments until we are informed by your office of the final route selected.*

**Response:** The Recommended Alternative in Section IV is E-3, which will avoid the referenced water line.

### 3.2 Written Correspondence Received from Agencies Regarding DEIS

This section of the FEIS provides a copy of all written correspondence received from agencies during the formal comment period regarding the DEIS. The section begins with a Correspondence Index, which lists the name of the agency and the date of their letter (or approximate date if no date was included). Copies were first organized into three categories, Federal, State, and County, and then ordered alphabetically by agency name within those three categories. Because of the high volume received, letters have been reduced to fit two per page.

Comment code numbers are noted within the index and marked within the margins of each letter to refer the reader to the applicable comment summary and the associated response (ref: FEIS - Part II, 3.1).

#### Correspondence Index

Agency Name	Date of Comment	Comment Codes	Page Number
US Department of Agriculture, Natural Resources Conservation Service	2-4-98	A1, A2	
DOA, Headquarters, USAG-HI	12-2-97	A3	
DOA, MTMC, Transportation Engineering Command	12-19-97	A4 through A14	
DOA, Conservation/Restoration Branch, Environmental Division	12-1-97	A15	
US Department of Commerce, National Oceanic and Atmospheric Administration	11-9-97 12-17-97	A16 Transmittal of comments	
US EPA, Region IX	1-16-98	A17 through A37	
US Department of Interior (USDI), Office of the Secretary	2-12-98	A38 through A87	
USDI, Fish and Wildlife Service, Pacific Islands Ecoregion	12-29-97	A88, A89	
USDI, US Geological Survey, Biological Resources Division	12-19-97	A90 through A92	
U.S. Senate	10-29-97	A93	

**Correspondence Index**

<b>Agency Name</b>	<b>Date of Comment</b>	<b>Comment Codes</b>	<b>Page Number</b>
State of Hawai'i, Department of Accounting and General Services	11-26-97	No comments.	
State of Hawai'i, Department of Defense	11-26-97	A94 through A97	
State of Hawai'i, Department of Health	12-24-97	A98 through A102	
State of Hawai'i, Department of Land and Natural Resources	1-5-98	Transmittal of comments.	
State of Hawai'i, Department of Land and Natural Resources, Land Division	12-3-97	A102.a	
State of Hawai'i, Department of Land and Natural Resources, Land Division	12-18-97	A103 through A107	
State of Hawai'i, Department of Land and Natural Resources, Division of State Parks	11-12-97	A110	
State of Hawai'i, Department of Land and Natural Resources, State Historic Preservation Division	12-22-97	A108, A109	
State of Hawai'i, Department of Land and Natural Resources, Division of Forestry and Wildlife	12-16-97	A111 through A167	
State of Hawai'i, Office of Environmental Quality Control	11-12-97	A168	
State of Hawai'i, Office of Environmental Quality Control	12-23-97	A169 through A178	
State of Hawai'i, Office of Hawaiian Affairs	12-19-97	A179 through A185	
County of Hawai'i, Advisory Committee on Bicycle and Pedestrian Safety	12-22-97	A186 through A192	

**Correspondence Index**

<b>Agency Name</b>	<b>Date of Comment</b>	<b>Comment Codes</b>	<b>Page Number</b>
County of Hawai'i, Department of Research and Development	12-8-97	A193 through A195	
County of Hawai'i, Department of Water Supply	12-26-97	A196	



*Our People...Our Islands...In Harmony*

February 4, 1998

Mr. Larry D. Henry, P.E.  
Project Development Engineer  
US Department of Transportation  
Central Federal Lands Highway Division  
P.O. Box 25246  
Denver, Colorado 80225-0246



Dear Mr. Henry:

Subject: HPD-16E (Saddle Road) - Draft Environmental Impact Statement (DEIS) -  
Proposed Improvement of State Route 200, Saddle Road

We apologize for responding in an untimely manner with regards to this document. We would like to offer the following comments:

The sections of the road that are being hugged up against the toe of Mauna Kea will be subjected to much greater velocities of runoff from the steep mountainside. The sediment load will be substantially greater than that currently experienced at the existing roadway. This area experiences flash flooding much like the southwestern deserts of the continental United States. The flat between the toe of Mauna Kea and the existing roadway has served as a de facto sediment de-energizer and sediment storage facility. Careful engineering will be needed to pass these sediment and runoff loads safely past the new roadway.

A1

The placement of the roadway next to the toe of Mauna Kea will reduce the opportunities to control wildfires which will undoubtedly increase in frequency with the expected increase in use of this highway. Wildfire is a major threat to the native plants and animals of the region and the main course of soil erosion on steep leeward slopes. Experience has shown that this south slope of Mauna Kea burns easily and limited access makes controlling a fire almost impossible. The present use of barren lands for much of the saddle area roadway and the level and accessible buffer strip between the road and the steep slope have minimized this threat in the past.

A2

The Natural Resources Conservation Service works hand-in-hand with the American people to conserve natural resources on private lands.

AN EQUAL OPPORTUNITY EMPLOYER

There is a planned curb to "catch" discarded cigarettes, an access control fence, and a paved strip 8' wide as a fire break. A good south (Kona) wind will breach these defenses easily and lift the fire rapidly upslope. In the past, the military had tried to control a wildfire on the south slope and did poorly under favorable conditions of little wind.

Thank you for allowing us to review this document and again our apologies in responding in an untimely manner.

Sincerely,

KENNETH M. KANESHIRO  
State Conservationist

The Natural Resources Conservation Service works hand-in-hand with the American people to conserve natural resources on private lands.

AN EQUAL OPPORTUNITY EMPLOYER





DEPARTMENT OF THE ARMY  
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII  
SCHOFIELD BARRACKS, HAWAII 96857-0000

REPLY TO  
ATTENTION OF

December 2, 1997



DEPARTMENT OF THE ARMY  
MILITARY TRAFFIC MANAGEMENT COMMAND  
TRANSPORTATION ENGINEERING AGENCY  
720 THORNTON BOULEVARD, SUITE 130  
NEWPORT NEWS, VIRGINIA 23806-2374

December 19, 1997

REPLY TO  
ATTENTION OF

Directorate of Public Works

Office of Special Assistant  
for Transportation Engineering

Mr. Larry D. Henry, P.E.  
Project Development Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Henry:

Reference your letter, dated October 15, 1997, requesting our review of the Draft Environmental Impact Statement (DEIS) for the proposed improvement of State Route 200, Saddle Road, Hawaii. Our comments are enclosed.

I'm looking forward to our meetings after all public comments are received in order to finalize the proposed action. As you know, the Army's preferred alternative is to relocate Saddle Road to improve traffic safety and minimize conflicts between military traffic crossing the highway and civilian vehicles. We would also be better prepared to discuss the Army's role in mitigating those impacts caused by highway realignment.

For additional information, please contact Dr. Raimo Liias, Chief, Environmental Division, at (808) 656-2878 ext. 1042.

Sincerely,

*Barry R. Tonney*  
Barry R. Tonney  
Colonel, U.S. Army  
Director of Public Works

Enclosure

Copies Furnished:  
Commander, U.S. Army Garrison, Hawaii  
Pohakuloa Training Area Commander  
Director of Plans, Training, Mobilization and Security  
Staff Judge Advocate

RECEIVED  
JAN 5 1998  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

RECEIVED  
JAN 5 1998  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Mr. Larry Smith  
Central Federal Lands Highway Division Administrator  
Federal Highway Administration  
555 Zang Street (Room 259)  
Lakewood, CO 80228

Dear Mr. Smith:

Following, are the Military Traffic Management Command, Defense Access Road (DAR) Program related comments to the Draft Environmental Impact Statement (DEIS), Saddle Road (State Route 200), FHWA Project No. A-AD-6(1):

- a. page S-22, Table S.6, "Summary of Impacts," Threatened & Endangered Species, Section II, EX-2, Comment: It states there are no direct impacts to the Palila critical habitat. Without direct impacts, the mitigation costs on page S-6 should be funded from other than DAR funds.
- b. pg S-24, para 1, line 10, Comment: It states that, "three areas outside the project corridor will be provided and managed to enable Palila habitat restoration and translocation..." It would appear that the DAR project would be responsible for replacing an approximate amount and type of property as those disturbed by the DAR project and the restoration and translocation would be funded from other than the DAR project. Management of property acquired for mitigation (off PTA) should not be the responsibility of the Department of Defense (DOD).
- c. pg 2-2, para 2 and 3, Comment: If a fire break is required for section EX-2, it must be necessary because of the projected increase in non DOD through traffic. EX-2 does not impact the Palila Critical Habitat (per page S-22), and DOD reportedly does not project a change from the present amount and type of training to be conducted at PTA. Therefore, the fire break for EX-2 should more appropriately be funded from other than DAR funds.
- d. pg 3-49, para 5, line 7, Comment: A map is needed to show Pu'u Mali, the Ka'ohe Leased Lands, and the Kipuka 'Alala.

A4

A5

A6

A7

A3

A1

A8 e. pg 3-106, section 3.10 Water Resources, Comment: There is no mention of the source and impact of water to be used during construction.

A9 f. pg 3-116, section 3.12 Climate, Geologic Hazards, and Soils, Comment: There is no mention of the source and impact of materials to be used during construction.

A10 g. pg 3-179, para 5, line 2, Change: change "plant" to "plan."

A11 h. pg 3-179, para 6, Comment: Need a figure (map) to show the areas (Pu'u Mali, Ka'ole Leased Lands (Pu'u La'au?) and Kipuka 'Alala). It does not seem reasonable for the DAR Program to fund for the purchase of 1864 ha (and various other large parcels of land) to replace 41.5 ha or 46 ha of critical habitat disturbed for PTA-1 or PTA-3, respectively. This purchased property should be managed by other than DOD. Additionally, the identified property is State property. Is part of the property already identified as critical habitat? We question if it is appropriate for DOD to pay for State leased land (already identified as critical habitat), that will remain State property under the control of DODAW.

The following are comments on the DEIS Technical Appendices - Volume III, Biological Assessment, Wetlands Determination:

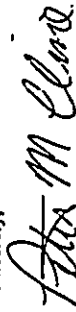
A12 a. pg 24, para 6, Comment: The DAR Program should not fund for the reintroduction of the Palila Bird.

A12 b. pg 25, para 2, Comment: As in comment h above, it does not seem reasonable for the DAR Program to purchase and set aside over 2500 ha of property to replace some 41 to 46 ha of disturbed Palila Critical Habitat.

A13 c. pg 31, Table 7, Comment: The DAR Program should not fund for three years work of a fire ecologist and should not pay the USFWS 25% to supervise the fire ecologist.

A14 We feel the environmental documentation provides an excellent reference to base decisions on preferred alternatives and environmental mitigation. We look forward to our continued work to execute this project. If you have any questions on these comments, please call me at (757) 599-1117.

Sincerely,



Peter M. Cline  
Senior Engineer for Access Roads

DPW ENVIRONMENTAL DEPARTMENT  
REVIEW COMMENTS

REPORT TITLE: Draft EIS for Saddle Road Realignment Project

REVIEWER: Mr. Alvin Cbar, Chief, Conservation/Restoration Branch, Environmental Division, DPW

DATE: 1 Dec 97

ITEM	PARA OR PAGE NO.	COMMENT	REVIEW ACTION
1		<p>The following statement in the Saddle road EIS is incorrect.</p> <p>"PTA is the only light infantry, live-fire training facility in the Pacific for the US Army Pacific Command and other Pacific Command units."</p> <p>We do live fire training at Makua and Schofield Barracks on a daily basis. It (PTA) is the only place where we can conduct Artillery battalion and larger live fire exercises. It is the only place where we can do Attack helicopter live fire gunnery tables. It is the only place we can do Joint live fire exercises. The only place we can do Slinger Surface to air and air to air live fire operations. It is the only place we can do mounted 3/4 Cav .50 caliber Machine Gun gunnery tables training. It is the only place where we can do TOW gunnery tables live fire.</p> <p>NOTE: ALL OF THESE LIVE FIRING EVENTS ARE IMPORTANT READINESS TRAINING EVENTS.</p> <p>It is also an important live fire training range for Marine, Navy and USAF ground and air weapons systems.</p> <p>It is also used as a Joint Training area by CINCPAC and higher Commands.</p> <p>I hope this helps. This is probable not a complete list, but it gives you a better picture and description than you had.</p>	
		NOTHING FOLLOWS	

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UNITED STATES DEPARTMENT OF COMMERCE  
Office of the Under Secretary for  
Oceans and Atmosphere  
Washington, D.C. 20530

December 17, 1997

Federal Highway Administration  
555 Zang Street (Room 259)  
Attention: HPD-16, Saddle Road  
Lakewood, CO 80228

To Whom It May Concern:

Enclosed are comments on the Draft Environmental Impact Statement for Proposed Improvement of State Route 200, Saddle Road, from the Mamalahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawaii. We hop our comments will assist you. Thank you for giving us an opportunity to review this document.

Sincerely,

*Susan Fruchter*  
Susan B. Fruchter  
Acting NEPA Coordinator

Enclosure

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JAN 5 1998

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UNITED STATES DEPARTMENT OF COMMERCE  
National Ocean Service  
National Oceanic and Atmospheric Administration  
National Geodetic Survey  
Silver Spring, Maryland 20910-3202

NOV 9 1997

MEMORANDUM FOR: Susan B. Fruchter  
Acting NEPA Coordinator  
FROM: *Charles W. Challstrom*  
Charles W. Challstrom  
Acting Director, National Geodetic Survey

SUBJECT: DEIS-9710-04--Proposed Improvement of State Route 200, Saddle Road, from the Mamalahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawaii

The subject statement has been reviewed within the areas of the National Geodetic Survey's (NGS) responsibility and expertise and in terms of the impact of the proposed actions on NGS activities and projects.

All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the NGS home page at the following Internet World Wide Web address: <http://www.ngs.noaa.gov>. After entering the NGS home page, please access the topic "Products and Services" and then access the menu item "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the NGS data base for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

If there are any planned activities which will disturb or destroy these monuments, NGS requires not less than 90 days' notification in advance of such activities in order to plan for their relocation. NGS recommends that funding for this project includes the cost of any relocation(s) required.

For further information about these monuments, please contact Rick Yorczyk; SSHC3, NOAA, N/NGS; 1315 East West Highway; Silver Spring, Maryland 20910; telephone: 301-713-3230 x142; fax: 301-713-4175.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

January 16, 1998

Mr. Larry Smith  
Division Engineer  
Federal Highway Administration  
Central Federal Lands Highway Division  
555 Zang Street  
Denver, CO 80228

OPTIONAL FORM NO. 10 (7-94)

FAX TRANSMITTAL

To: Mr. D. McCoolley

From: Mr. D. McCoolley

Date: 1/15/98

Time: 15:24-1577

Page: 9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Dear Mr. Smith:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Saddle Road (State Route 200) Mamala-hoa Highway (State Route 190) to Milepost 6 Project, Hawaii County, Hawaii. We provide our comments pursuant to Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR Parts 1500-1508).

The Federal Highway Administration (FHWA) proposes to improve Route 200 Saddle Road between the Mamalahoa Highway and Milepost 6 in Hilo. A "No Build" alternative, and several "Build" alternatives within designated sections are presented in the DEIS. Section 1 contains alternatives W-2 and W-3. Section 2, which encompasses the Pōhakuloa Training Area (PTA), considers alignments designated as EX-2, PTA-1 and PTA-3. Section 3 offers an alternative that follows the existing alignment, known as EX-3. Section 4 has two alignments EX-4A and E-3. Linking each section's alignments together creates 12 alternative alignments for the length of the project. The DEIS did not identify FHWA's preferred alternative.

Because FHWA has not designated a Preferred Alternative, we have assigned a rating of EO-2 (Environmental Objections, Insufficient Information) to all of the "build" alternatives. Attached is an explanation of our rating system. We have objections to the project based upon the potential for significant individual direct and indirect adverse impacts to water quality, wetlands, and threatened and endangered species habitats caused by any of the "Build" alternatives. In reviewing the DEIS, we find that the discussions of impacts to water quality, waters of the U.S., and particularly mitigation measures are deficient. The DEIS also failed to provide a sufficient discussion of the indirect and cumulative impacts caused by each of the proposed alternatives.

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We are very concerned that FHWA never initiated the NEPA-404 Integration Memorandum of Understanding to address Purpose and Need and alternatives analyzed in the DEIS. At this point we remind FHWA of their obligation to the MOU and strongly recommend that the process be initiated at this point. Please refer to the MOU and its guidance papers for direction on how to proceed with documentation after a DEIS, but before the release of a Final EIS (FEIS).

A18

While we found the DEIS to be generally well written, the lack of pertinent information and the degree of impact to sensitive wetland resources is cause for great concern. We strongly recommend that FHWA incorporate the information we found lacking in the DEIS into a more comprehensive FEIS. Because of the long duration over which construction of the various sections of the roadway would occur, we anticipate that FHWA will revisit environmental aspects of the project through "re-evaluations" and/or other NEPA analysis and documentation. With that in mind, we recommend that FHWA use the commitments made in the FEIS as starting points to strengthen future environmental documentation. We request that such documentation be forwarded to this office for our review and input. Please refer to the attached comments for a more detailed discussion of issues and recommendations.

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We appreciate the opportunity to comment on the DEIS. I understand that staff members from EPA and FHWA will schedule a meeting in the near future to discuss the important issues we have identified. If you have any questions, please feel free to contact me at 415-744-1566, or David Farrell, Chief, Federal Activities Office at 415-744-1584, or have your staff call David J. Carlson of my staff at 415-744-1577.

Sincerely,

Deanna M. Wieman, Deputy Director  
Cross-Media Division

cc: Merrill Deakins, FHWA, San Francisco  
Jeff Burgett, USFWS, Hawaii

U.S. EPA/OFA 415 744 1598 11:03 01/21/98

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**SUMMARY OF FINDING, DEFINITIONS AND FOLLOW-UP ACTION**

**Environmental Impact of the Action**

**1.2 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.

**1.3 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.

**1.4 Environmental Objectives**

The EPA review has identified significant environmental impacts that must 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.

**1.5 Environmental Unsubstantiated**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsubstantiated from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsubstantiated 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, the spectrum of alternatives available to 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 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."

U.S. EPA Comments - Draft Environmental Impact Statement  
Route 200 Bredie Road Project  
Hawaii, HI  
January, 1998

**GENERAL COMMENTS**

**Alternatives**

We believe that there are alternative alignments and/or design modifications that may have lesser impacts to the resources found in Sections II, III, and IV. Based upon the discussion of alternatives in the DEIS, FHWA has not shown that other alternatives, such as modifying the roadway footprint or other alignments, might have lesser impacts or avoid resources. This is particularly true for sections III and IV.

A21

The alternatives discussion in the DEIS does not provide a substantive discussion of other considered alignments. Based upon this DEIS and what we viewed in our field visit in December of 1997, we believe other alignment alternatives that could achieve the Purpose and Need for the project may be possible. Specifically, we request that FHWA provide documentation regarding other alternatives in Section IV that avoided or had lesser impacts to wetland areas. We also ask that FHWA provide rationale for attempting to achieve a design speed of 80-100 KPH. The DEIS does not discuss the intent for providing a design speed that is as high if not higher than other similar facilities on the island. Would the Section III alignment need as much modification, with the related resource impacts, if the design speed was lowered and there was an enforcement presence? Does reduction of the roadway speed give FHWA greater latitude in attempting to meet grade and turn safety standards? Does reduction of the design speed for the roadway result in lesser impacts to resources? The FEIS should include a more detailed discussion of FHWA's evaluation of alternatives and rationale for proposing the alternative selection criteria.

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A23

**Cumulative Impacts**

We believe that the project offers a high potential to continue the trend of losses of native vegetation and habitat along the alignment(s). The DEIS discusses a variety of expected impacts, from further intrusion by humans and alien species to fire hazards and changes in land use. These issues are a serious concern for EPA and we believe that FHWA has not fulfilled their obligation under NEPA to offer potential mitigation for these various cumulative and indirect effects. We recommend that FHWA continue consulting with the Fish and Wildlife Service and request inclusion in further discussions and resolutions of these issues.

A24

**WATER RESOURCES  
Waters of the U.S.**

Statements in the DEIS that Sections I and II do not contain any waters of the U.S. are incorrect. At least some of the ephemeral drainages, washes, and intermittent streams described in the DEIS as needing culverts or crossings to avoid flooding on the road, are waters of the U.S.

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A26 We confirmed this during our field visit in December 1977. We recommend that FHWA, in coordination with the Corps, Honolulu District, revise the discussion of waters of the U.S. to account for those resources that EPA believes are jurisdictional waters of the U.S. That discussion in the FEIS should have a more detailed description of the types of culverts, crossings, and structures that may be placed in these waters.

A27 The DEIS reports the acreages of direct wetland impacts for sections III and IV, and states that no distinct biological functions are known for the wetlands in the study area. The discussion should clarify that the functional importance of the physical, chemical, and biological aspects of the wetland types are not well known. As written the DEIS proposes that these areas are without function and, therefore, of little value. However, based upon the discussion of the vegetation types present in the wetlands and drainages, the extent of the vegetative cover, the maturity of the vegetation, the quality and diversity of the habitat, and the hydrology, we believe that wetland resources in the project area may in fact be highly functioning resources, due to the unique assemblage of vegetation, soils, and hydrology. Similarly, the statements that the biotic communities are widespread may not be accurate. The DEIS strongly suggests that several of these communities found in the study area are found only on this part of the island of Hawaii. Additionally, the groundwater recharge and associated water quality and quantity functions of these areas could be significant but is not documented. Therefore, we believe that the areas to be impacted by the alignments within Sections III and IV may be highly valuable. While there may be areas that are interpreted to be less valuable biologically due to the absence of native vegetation, such as along alignment E-3, we suggest that FHWA should take this opportunity to exercise environmental stewardship. These areas have ecological and functional value and therefore the impacts to these wetlands will require mitigation. We recommend that FHWA explore opportunities, not only for preservation, but for enhancement of those wetland habitats within the project study area.

A28 The document states that impacts to jurisdictional wetlands found in the area will be difficult to avoid but offers no mitigation measures to offset those impacts. Direct and indirect impacts from highway and road developments can impair functioning ecosystems. This is particularly true for impacts to species that are not well-suited to constant disturbances such as would result from a roadway that expands its level of service by 13,000 Average Daily Trips. Therefore, the fact that the wetland resources may be of great value warrants that FHWA propose and commit to mitigation for those impacts in the subsequent NEPA document. While it may be true that replacement or creation is not practicable for these resources, FHWA does not seem to have examined the full range of options. We strongly suggest that FHWA identify other wetland areas, similar to those impacted by the project, which could be suitable for protection and management. The area of protected and preserved wetlands should reflect the direct, indirect, and temporary impacts.

A29

A29 FHWA should engage in discussions with EPA, the Fish and Wildlife Service and the Army Corps of Engineers to determine: 1) appropriate sites that are unprotected and have a potential for loss of resources; 2) mitigation ratios; and 3) estimated costs and potential funding and management mechanisms. These discussions of mitigation, especially protection and enhancement, should identify the location of the mitigation areas and should include a detailed presentation of the hydrology, biology, and habitat functions of the areas in which the proposed mitigation would take place. This critical information will allow resource agencies to evaluate the viability of maintaining the functions that would be lost. We understand that the Fish and Wildlife Service may have identified a wetland and endangered species area that may have opportunities for enhancement activities. We would appreciate further information regarding this area's potential as possible mitigation for some of Saddle Road's impacts to resources. Development of these mitigation commitments must be made before FHWA releases the FEIS to the public.

A30 We believe that FHWA may have underestimated the impacts to wetlands, since indirect impacts are not included in the amount of acreage expected to be lost. The DEIS acknowledges the types of indirect impacts that could be expected but fails to further explain the effect of these impacts on the resources. The FEIS should examine whether the project alters the surface or shallow subsurface hydrology of the area, possibly resulting in additional losses of wetlands, and how to mitigate those losses.

#### NEPA-404 Memorandum of Understanding

A30 We are extremely concerned that FHWA did not begin implementation of the NEPA-404 Integration MOU. Had the NEPA-404 MOU process been done earlier, the resource agencies and FHWA could have agreed early in the process on the alternatives analysis, the appropriate alternatives for study, and the possible mitigation measures.

The MOU clearly obligates FHWA and the state DOTs to obtain written agreement from EPA, USFWS, and NMFS as well as the Corps, that they have met all of the MOU requirements, before the release of an environmental document. State DOTs are not to program projects that have not followed the NEPA-404 process. We strongly recommend that FHWA supply all appropriate documentation to EPA and the other resource agencies, and allow us to review the information. According to the MOU, this project should not proceed to the Final stage until FHWA has obtained concurrence from all signatory agencies. FHWA should consider initiating the NEPA-404 MOU process to solicit resource agency input on the least environmentally damaging practicable alternative, the mitigation plan and the implementation schedule. We recommend that FHWA review Appendix A of the NEPA-404 MOU to determine the type of information to send to EPA, USFWS, and NMFS, to fulfill the requirements of the MOU. Additionally, other MOU requirements may also be applicable, (e. g. §401 water quality certification).

### Water Quality and Hydrology

Erosion, runoff and material spills during construction and operation of a roadway can contaminate and degrade groundwater sources such as aquifers. The DEIS discussion of hydrology is sparse and does not provide meaningful information to evaluate and arrive at an understanding of the impacts to these resources. FHWA acknowledged an increase in contaminants in runoff entering the roadway, however, the DEIS only mentioned groundwater resources on the western end in Section I and II and does not provide similar information regarding hydrology and groundwater depths in Sections III and IV. The DEIS also did not discuss drinking water sources from any potentially affected wells in these sections. We have information, found in a Department of Water Supply August 1997 Environmental Assessment, that a local well planned for a location very close to the existing Saddle Road in Section IV, and that there is an existing reservoir adjacent to the road. A better description of the ground water, geology, and aquifer types and depths would have been helpful. The DEIS discusses the extremely porous soils and substrates, but does not go further to relate these to impacts to groundwater and hydrology. The FEIS should have a discussion of the hydrological relationship between the aquifer and the potential for leaching of surface runoff water to the aquifer. FHWA should provide information on these hydrological and groundwater issues, and provide a detailed discussion of the surface - ground water connectivity.

A31

The DEIS mentions that the DLNR is directing a cross-island water transmission project to bring additional water to the west side of the island using the Saddle Road as a guide for the transmission lines. However, the DEIS addresses the impact on the DLNR project solely as interference with the construction and implementation of the transmission line and does not address the roadway runoff impact to the sources of water feeding the transmission line. FHWA should briefly describe the roadway construction and operation impact to the groundwater resources that the transmission line project is dependent on and if steps should be taken to avoid adverse impacts. We strongly recommend that FHWA consult with DLNR and the Department of Water Supply to determine the potential impacts and appropriate mitigation measures needed to protect drinking water sources.

A32

### National Pollution Discharge Elimination System (NPDES)

The DEIS does not sufficiently discuss the potential for a net increase in nonpoint source pollution from the proposed project. FHWA should provide more detail to support such statements as "Contaminated Stormwater could degrade the quality of surface waters or filter through soils and potentially impact groundwater sources." FHWA did not summarize any pollutant data from the Hydrology technical report. Therefore, suggesting any possible mitigation measures that would be appropriate for the project is difficult for us. However, we suggest that FHWA examine opportunities to altogether eliminate roadway contributions to the pollutant loads

A33

into water systems.

The DEIS does discuss the requirement to develop and implement a Storm Water Pollution Prevention Plan, including specific Best Management Practices (BMPs) to reduce pollution effects, before the commencement of construction. However, this plan does not discuss the location of the permanent facilities nor their efficiency to reduce or eliminate erosion and runoff impacts to groundwater. The DEIS does not describe potential impacts from any cut and fill operations, and dewatering that may take place if FHWA encounters groundwater. This plan should consider cumulative effects and should include a discharge monitoring plan. The DEIS does not discuss the conformance of the construction of the project with FHWA's "Final Rule on Erosion and Sediment Control on Highway Construction Projects," 23 CFR 650, Subpart B, revised July 26, 1994 (Fed. Reg. vol. 59, no. 142, 37935-37939). FHWA should discuss the relationship of this final rule to the project.

A34

We recommend that FHWA further describe the BMPs that will be utilized and commit to their implementation in the Record of Decision (ROD).

A35

### THREATENED AND ENDANGERED SPECIES

EPA believes the impacts to threatened and endangered species is serious. The DEIS documents many potential threats from fire hazards, alien species, contaminated runoff, and human intrusion that will be further complicated and continued due to construction and operation of the project. We are particularly concerned with the impacts to 'Awcwooo shrubland, hard stemmed lovegrass grassland, and Palila habitat and believe that the potential for fire impacts to seriously damage the unique native plant ecosystems is high. The FEIS should address, in a detailed discussion, the measures that FHWA will undertake to minimize impacts from fire on Palila and other species. We recommend that FHWA continue their consultation with the Fish and Wildlife Service on measures to mitigate and minimize impacts to threatened and endangered species. We also support the Fish and Wildlife Service in their concerns and comments regarding the impacts to threatened and endangered species and encourage FHWA to initiate whatever mitigation measures they deem to be appropriate for the Palila and other species.

A36

### POLLUTION PREVENTION

Pursuant to Public Law 91-508, Pollution Prevention Act of 1990 (PPA), "It is the policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible, and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe

A37

U.S. EPA Comments- Draft Environmental Impact Statement  
Route 200, Saddle Road Project  
Hawaii, HI  
A-0002-1128



United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20240

A37

Your subsequent NEPA document should describe how FHWA would carry out programs and practices to insure that the project will comply with the FPA. We have enclosed guidance on possible Pollution Prevention methods FHWA should consider.

ER-97/612

FEB 12 1998

Mr. Abraham Y. Wong  
Division Administrator  
Federal Highway Administration  
Prince Jonah Kūhiō  
Kalanianaʻōle Federal Building  
300 Ala Moana Blvd., Room 3702  
Box 50206  
Honolulu, Hawaii 96850

Dear Mr. Wong:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental Impact Statement (DEIS) for Saddle Road (SR-200) from Mamalaohā Highway (SR-190) to Milepost 6, Hawaii County, Hawaii.

**SECTION 4(D) EVALUATION COMMENTS**

A38 We concur that there is no prudent and feasible alternative to the proposed project, if project objectives are to be met. However, we do not believe that all possible planning has been done to minimize harm to Section 4(D) resources.

A38 A total of 16 historic archeological sites were observed and recorded within the area of potential impact. Therefore, we recommend continued cooperation and coordination with the State Historic Preservation Officer in order to prepare a Memorandum of Agreement (MOA) which should include measures to avoid or minimize harm to the archeological sites which may be affected by the proposed project, including native Hawaiian burial and ritual sites, in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. A signed copy of the MOA should be included in a Final Section 4(D) Evaluation which should be made a part of the Final EIS.

**ENVIRONMENTAL STATEMENT COMMENTS**

A39 Overall, we find the DEIS to be well written. However, we recommend that greater detail be provided in the sections of the EIS pertaining to the affected environment and mitigation to clearly link project impacts to proposed mitigation. The document acknowledges that there may be an increase in quantity and distribution of pest species, including plants, mammalian predators (released pets and rodents associated with human activity) and invertebrate pests (ants, wasps and bees, bugs, beetles, etc.); however, the environmental impacts of these organisms to trust resources are not well described. Alien species invasions are known to be the primary cause of habitat fragmentation and degradation in Hawaii and one of the major threats to the survival and health of native species in Hawaii.

A41 As the U.S. Fish and Wildlife Service's (Service) comments on the Preliminary DEIS stated, plant and invertebrate Species of Concern (SOCs) are only briefly mentioned in the DEIS. Adverse impacts to SOCs and other native wildlife should be given full consideration as part of the NEPA process. Therefore, the EIS should include a discussion of impacts to these resources and identify measures to avoid, minimize, or mitigate these impacts. Because of the scope of the project, it is anticipated that the planning and construction phases will span several years. It is likely, therefore, that some of the SOCs could become listed species by the time the project is completed and, therefore, be subject to consultation under Section 7 of the Endangered Species Act (ESA) of 1973, as amended.



A42 The existing discussion of fire management is limited to the Pohakuloa Training Area and their fire management plan. This discussion should be expanded to address fire sensitive areas in other portions of the Saddle Road project in which there is a possibility of fire (i.e., east and west of the Pohakuloa Training Area (PTA) and should be modified to address proactive and preventative measures, such as presuppression activities that could include firebreak maintenance and fire hazard signage, in addition to the proposed detailed reactive plan.

A40 Mitigation for expected alien species impact is proposed in the form of treating construction equipment, spraying and mowing roadsides, and funding research on biology and interactions of invertebrate pests on Palila (*Loricoides baileyi*) food resources. Because the impacts of alien species will continue past the construction of the project, the Service recommends that additional, long-term mitigation be investigated and proposed.

A43 Under the Section 404 (Clean Water Act) review, unavoidable project impacts to native-dominated wetlands could require mitigation. Determination of the appropriate type, amount, and location of mitigation should be accomplished prior to project initiation.

A44 The DEIS does not discuss how the implementation of the mitigation for this project outside of the Palila Oversight Committee's jurisdiction will be carried out and assured. The Service recommends that a separate biologically oriented entity (other than the "Palila Oversight Committee") be appointed to administer mitigation and the associated funds for the entire project or portions of the project that are outside of the Palila Oversight Committee's jurisdiction. We also recommend that this separate entity have the ability to ensure that mitigation requirements are met as agreed prior to the beginning of the project. In order to assist this entity, the Service also recommends that a biologist be hired and remain on site for the duration of construction. In order to mitigate for impacts outside of the Palila Oversight Committee's jurisdiction and/or which are expected to occur after the project is completed, it may be beneficial to set up a trust fund which is administered by the separate entity.

A45 Furthermore, we recommend that a project-wide resource education and interpretation system be established. In cases where there appears not to be a way to mitigate expected impacts or mitigation of these impacts is unsustainable, we recommend that these instances be clearly stated in the Final EIS and reasons for the lack of mitigation identified.

Because the DEIS refers to the Biological Assessment (BA) and associated documents, some of our specific comments also refer to these documents.

**Section 3.3.4 Outdoor Recreation Resources and Hunting**

A46 This section addresses hunting uses and issues thoroughly (3.3.4.1), however, it provides little information concerning other recreational uses. The Service recommends that recreational activities other than hunting, such as gathering, birdwatching and nature study be addressed under the affected environment section of the Final EIS. These users are not only local residents coming to the forest for religious and subsistence purposes, they also include visitors from all over the world. The uniqueness of Hawaii's biological communities draw naturalists, scientists and recreationists who come to hike, observe, and study Hawaii's unique life forms and biological assemblages. The impacts of these user groups may be similar to that of the hunter group. We assert that these are major user groups of the resource that deserve equal consideration in development of the construction plan and mitigation measures.

**Section 3.5.2.2.2 Other Relocations**

A47 Relocations of the Pohakuloa buildings near the Bradshaw Army Airstrip to the west of their current location will adversely impact native shrubland and grassland which is potential habitat to the plant species, *Silene hawaiiensis*, a federally-threatened species. The Service recommends that the impacts of these building relocations be evaluated and possible mitigative measures be identified in the Final EIS.

**Section 3.9 Fire Hazard**

A48 This section does not adequately address the portion of section 1 of the road that traverses native grassland and shrubland and shrubland invaded by fountain grass. All of section 1 is not kibunyo-dominated pasture. The upper portions of this section possess a vegetation structure that is very flammable and is contiguous with rare plant habitat. Native *ʻāliʻi* shrubland and native hard-stemmed lovegrass grassland are unique to Hawaii, the latter occurring

A48 exclusively in alluvial flats of the PTA. The proposed project would increase the likelihood of wildfire caused by human activity along upper portions of Section I and perhaps the upper portions of Section III. The Service recommends that fire hazard for these portions of the proposed project be addressed under Sections 3.9.1, Affected Environment; 3.9.2, Environmental Consequences; and 3.9.3, Mitigation Measures.

A49 Fire Plan - The BA addresses the implementation of the PTA Fire Plan and the hiring of a fire ecologist to develop a more thorough plan that pertains to the upper portion of Section I, the eastern portion of section II, and the western end of Section III. The Service recommends that the EIS address how the PTA Fire Plan will be expanded to include these other portions of the project and when the revised plan is expected to be completed.

**Section 3.11 Waters of the U.S./Wetlands**

A50 The Service has reviewed the method used to estimate the wetland areas within the vegetation types in Sections III and IV of the project, and agrees with the preliminary estimates of wetland area presented in the DEIS. However, more accurate delineations may need to be performed during the final alignment of these sections to determine the true area of wetland fill.

A51 The Service's estimate of the value of the wetlands directly or indirectly affected by the project differs from that put forward in the DEIS. The Service does not agree with the assessment (p. 3-113) that because "no distinct wetland biological functions are known from any of the wetlands within the study area" these functions are non-existent and the biological implications of wetland fill are therefore minimal.

A51 On the contrary, wetlands indicators and inclusions are intrinsic characteristics of the valuable biological communities traversed by the proposed alignment. The vegetation types which contain wetlands support listed species of plants (Ohi'a forest, Kot-Ohi'a forest) or are successional antecedents of such vegetation (Ohi'a scrub). The role of wetland hydrology and soils in fostering native animal and plant diversity in these systems is unknown but potentially important. The Service therefore disagrees with the statement that the "biological value of these wetland areas is not associated with their wetland qualities." (p. 3-114).

A51 The Service also does not agree with the assertion (pp. 3-113-114) that the native biotic communities in Sections III and IV are widespread. When the plant community of one of the wetlands near the road (Ohi'a forest) includes a species with nine extant individuals, that plant community cannot be considered widespread. As stated in the DEIS, the vegetation (and other biota) reflect the age and type of the lava substrate and the microclimate. Windward Mauna Loa lava flows of that age and at that elevation are nationally scarce, and scarce even within the Hawaiian islands. Additional lava flows, as well as continued degradation of wet forest in Hawaii by alien species of plants and animals, will make intact examples of these communities more scarce in the future.

A51 The statement (p. 3-114) that none of the wetlands contains any unique combination of species conflicts with the botanical surveys which show *Clermontia peltana* ssp. *peltana* (endangered), *Cyanea platyphylla* (endangered), *Tetraploandra oahuensis* and *Trematolobelia grandifolia* (species of concern) in the ohia forest wetlands adjacent to the proposed alignment (Technical Appendix I, Section III). None of the other seven individuals of *Clermontia peltana* ssp. *peltana* grows in proximity to *Tetraploandra oahuensis* and *Trematolobelia grandifolia*. The Service must assume that this vegetation community, including its wetland characteristics, is crucial to the survival and recovery of *Clermontia peltana* ssp. *peltana*, *Cyanea platyphylla* and other rare species.

A51 Based on these factors, we believe the native-dominated wetlands impacted by the proposed project to be of high value and relatively scarce. The agriculturally disturbed wetlands in Segment E-3 are recognized as lower value than the native-dominated wetlands.

A51 Avoidance of wetlands along the alignment is not possible and minimization of wetland area to be impacted has been pursued during planning. The Service agrees with the statement in Section 3.11.3 that replacement or enhancement are not feasible options. The next most preferable mitigation option for wetland impacts is protection and

management of existing, unprotected native wetlands similar to those in the project area. The permanent net loss of high value wetlands, with the added potential of the project to lead indirectly to further degradation of wetlands along the corridor (p. 3-11.3), creates a need for the area of wetlands protected to exceed the area lost by a large factor.

We recommend that Federal Highway Administration begin discussions with the Service, the U.S. Army Corps of Engineers (USACE), the U.S. Environmental Protection Agency, and the State of Hawaii Department of Land and Natural Resources (DLNR-DOFAW) to:

- Determine an appropriate mitigation ratio (area protected to area lost).
- Locate an appropriate unprotected natural area near, but not adjacent to, the Saddle Road that could be managed as a mitigation site and potentially an outplanting site for rare wet forest plants. A site away from the road is preferable due to potential indirect impacts of the project.
- Estimate costs of ungulate-proof fencing and yearly maintenance (e.g., weed control) for the mitigation area.
- Explore creation of a mitigation fund to be held in trust by a third-party, non-profit, technically competent organization and used for approved management of the mitigation area and propagation and outplanting of rare plant species (See General Comments above).

The results of these discussions should be included in Section 3.11.3 of the EIS.

The Service strongly recommends that mitigation commitments be secured prior to disturbance of wetlands by the proposed project. The exact area of wetlands to be disturbed is unknown at this time due to the existence of alternative alignments and the preliminary nature of the Design in Segments III and IV. For planning purposes, the Service will assume that the stated maximum of 5.63 hectares of wetlands will be impacted by the project.

To help minimize impacts to wetlands, the Service suggests that no scenic pullouts be located in or near *kipuka* of ohia or koa-ohia forest and methods to discourage stopping near these *kipuka* be implemented (i.e., signage stating that pull-outs are located further down the road away from the *kipukas*, etc.). This may help to reduce human and other animal intrusion, dumping of unwanted pets or proliferation of scavengers such as rats.

**Section 3.13 Vegetation**

The BA and the preliminary DEIS acknowledged that there will be an increased likelihood of access and colonization of biologically important areas by alien plants and invertebrates, ungulates, and other mammalian predators. This discussion is not included in the DEIS under Section 3.13 and Section 3.14. Potential impacts to native vegetation and invertebrate resources from alien plant and invertebrate introductions and ungulates and mammalian predators should be discussed and measures to reduce these impacts identified. Please refer to the discussion under Threatened and Endangered Species (Section 3.18) for more comments on alien species control.

Section 3.13.1.1 does an excellent job of describing the various plant communities that the proposed project would affect, although the classification scheme is inconsistent. On the west side (sections I and II) the classification is based on dominant species and physiognomic structure, whereas on the east side (sections III and IV) the classification is based on climatic zone and physiognomic structure. Nonetheless, several unique and ecologically important plant associations are described and a clear distinction is drawn between native and non-native communities. A relevant aspect of these communities is their occurrence elsewhere and their uniqueness on a larger scale. While some of these communities are common in similar climates throughout the archipelago (A'ali'i shrubland, lowland wet forest, monsoon wet forest), some are restricted to similar geologic substrates within specific climates (pioneer vegetation on lava flows in Hawaii are represented only on Hawaii and Maui and Mamane/Maio forest occur only on Hawaii), and others occur nowhere else in the world other than within the project area's Sections I and II (Aweoweo shrubland and Hard-stemmed Lovegrass grassland).

Environmental consequences throughout this section include the permanent loss of habitat and unique plant communities which not only harbor endangered species but are extremely precious in that they are the only examples of these habitats in existence. Mitigation for these losses should include protection of a much larger area than the quantity of habitat lost to construction. Protection should be in the form of fencing to remove all ungulates, complete weed control, and control of alien invertebrate pests where feasible. Furthermore, the Service recommends that an educational and informational kiosk be located atop the "7-steps" overlook to increase public awareness of these unique plant communities, thereby potentially reducing future impacts to these resources. Use of a mitigation trust fund (see comments on Section 3.11 and General Comments above) to fund protection and continuing management should be thoroughly explored in the EIS.

**Section 3.18 Threatened and Endangered Species** (BA pages 37, 46, 48-49, and 54-55)

The adequacy of the mitigation measures for the potential spread of alien species, which affect native vegetation (Section 3.13), wildlife (Section 3.14), and threatened and endangered species (Section 3.18), are discussed below.

The DEIS states that construction equipment will be steam cleaned and fumigated before any transportation to the construction site. The Final EIS should identify that this will occur off-site from the road corridor. The DEIS mentions that "every attempt" will be made to sterilize any fill that is brought into the area from elsewhere. The final EIS should explain how sterilization will be accomplished, how adequacy of sterilization will be assessed, and under what conditions sterilization will not occur or will not adequately kill alien species vectors. Under circumstances where the fill is not adequately sterilized, monitoring and alien species control efforts especially need to include those areas where the fill is deposited. Actions outlined to bulldoze into ruderal areas, rather than from them into native vegetation, may minimize the spread of alien species, depending on how they are implemented. If a bulldozer moves from native vegetation far from the roadway through ruderal areas nearer the roadway, and then repeats the same movement in an adjacent area, the ruderal alien plants will still be transported into the native vegetation. Since an increase in quantity and distribution of alien plants along the roadway is not completely preventable, a detailed monitoring plan and implementation schedule is needed to prevent the establishment of alien plants that are spread.

Potential alien species introductions into the area is not limited to road construction. Road construction will provide the initial pathway for potential alien species introductions into the project area; subsequently, a constant, increased threat of invasion from alien species being transported along the road can be anticipated as a result of increased traffic.

Reference was made in the preliminary DEIS to a comprehensive long-term weed and alien insect monitoring and control program to be developed by the Army. No mention is made of this plan or its expansion to include the entire length of the roadway in the current DEIS. Whenever an alien species is found spreading from the road, immediate control should be initiated. The long-term alien species control and monitoring plan must include staging areas as well as roadways, and needs to extend beyond the roadway at least 100 feet in Sections II and III, to prevent the spread of alien species from the roadway into adjacent native vegetation.

Fountain grass (*Pennisetum setaceum*) spread along EX-2, PTA-1, PTA-3, and EX-3 will be monitored every four months during construction and any emerging fountain grass will be sprayed with a suitable herbicide, such as Roundup. Upon completion of construction, it is our understanding that the DOT will maintain the roadway with mowing, and where necessary use herbicides to control roadside weed and grass growth. This control should continue as long as the road is in operation. These actions should be included in the long-term monitoring and control plan. The alien species monitoring and control plan should be implemented in Section II and in or near all of the *kipuka* found in Section III of the project area. Within section III, alien plant control should not include herbicide use along the margins of wet forest, since repeated past herbicide application has failed to control invasive grasses but has damaged native vegetation. The invasive grasses have now been documented in these wet forests. Mowing is the preferred alternative.

As discussed at our April 9, 1997, meeting and in our May 2, 1997, letter reviewing the preliminary DEIS, we are willing to assist the Army in preparing this plan along with close coordination and input from the Hawaii Division of Forestry and Wildlife, BRD, and the DOT. This plan should be expanded to include the entire length of the roadway and be developed and ready for implementation at the time construction starts.

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surveyed. In addition to fencing for ungulate control, there will also need to be a detailed management plan which includes weed control, fire control, and monitoring. At a minimum, the site for reintroduction should be chosen before the mitigation costs are finalized, since the costs will increase if additional fencing is needed. The costs of this propagation and reintroduction and responsible parties should be specified and included in the mitigation costs of the project.

■ 3.18.3 Mitigation Measures, Section II  
 Because Section 3.18.3 Mitigation Measures, Section II references the Palila Mitigation Plans (Technical Appendix III, Biological Assessment, Appendices B, C, and D) as the major component in the proposed mitigation for the construction of either PTA 1 or PTA 3, the following comments directly refer to the aforementioned appendices. Comments are appropriate to all three appendices unless otherwise specified.

At present, the plan does not provide the reader with adequate information for understanding both the biological background surrounding Palila mitigation. While we are certain that appropriate management is planned for these areas, explanations and justifications for the management choices should be expanded in order to strengthen the case for Palila mitigation.  
 Specifically, a schedule for the implementation of each action should be included for each Palila Mitigation plan as well as identification of the party(ies) responsible for carrying out each task.

A site description of each parcel should be included that discusses the biological resources in the area as well as potential threats to Palila and/or Palila habitat. Current vegetation maps of all the mitigation areas should be included in the plan.

The Final EIS should explain that some mitigative decisions were based on economic and cultural as well as biological criteria. It is the belief of the Service that in order to maintain the biological integrity of Palila mitigation, decisions that were made for cultural or economic reasons (e.g., cattle grazing and mowed corridors) should be identified as such.

Specific Comments  
 Introduction  
 Language about restoration should be used carefully. The term "rapid restoration," if used, should be defined. The second half of this paragraph implies that Palila recovery can be assured given intact habitat. Palila decline is not due solely to the result of habitat degradation. We suggest that other possible causes for decline such as fire, disease, and effects of alien species should be acknowledged.

The wording in this paragraph should be changed from "...so as to ensure the restoration of the mamane forest on them and ultimately the establishment of a second viable Palila population..." to "...promote the restoration of the mamane forest and the establishment (or reestablishment) of Palila..." This is an important distinction, as we cannot "ensure" the reestablishment of either Palila, or mamane.

Management  
 Although the Service supports "adaptive management" as a means for providing enough flexibility to allow for implementation of the most recent management techniques, we continue to stress that "adaptive management" should not preclude the development of detailed management plans with implementation timetables that will provide the basis for future adaptive management decisions.

Endangered Plants  
 The DEIS states that no direct impacts are anticipated on threatened and endangered plants as a result of this project. However, potential secondary impacts put *Cyanea platyphylla*, *Clermontia petraea* ssp. *petraea*, and *Silene hawaiiensis* at increased risk. These secondary impacts include: 1) an increase in the number and distribution of alien species; 2) an increase in threats from human disturbance due to an increase in traffic (including tourists) and, therefore, an increase in the probability that people will stop and disturb habitat or destroy the plants; and 3) for *S. hawaiiensis*, an increase in the threat of fire. The Service recommends that appropriate mitigation be developed for these species, possibly through implementation of a mitigation trust fund, as outlined above (comments on Section 3.11, 3.13, and General Comments), propagation, and off-site mitigation. Mitigation measures for alien species impacts are discussed on the previous page of this letter and for fire in Section 3.9. The Service would be willing to provide input and guidance on appropriate mitigation for these species.

The Service is also concerned about the largest population of *Silene hawaiiensis* located in the north east corner of PTA. Currently, military training is relatively infrequent, since vehicle traffic along Saddle Road hinders training exercises. If PTA-1 or PTA-3 is selected as a segment of the preferred route, the military training within the area of this large population of *S. hawaiiensis* may increase and have a direct impact on this population. In addition, ungulate browsing may threaten this population of *S. hawaiiensis*. The Service strongly supports the implementation of conservation measures for this population of *S. hawaiiensis*. Fencing this population to protect it from both ungulates and humans is recommended.

The three identified routes in Section II (PTA-1, PTA-3 and, and EX2) will not result in direct destruction of plants, but may indirectly increase the destruction of three populations of *S. hawaiiensis* in addition to alien plant and invertebrate introductions. Fire is another serious threat to all populations of *S. hawaiiensis* (e.g., construction workers could start fires with cigarettes or idling equipment). Since any of these activities could result in the destruction of *S. hawaiiensis* individuals, we recommend that the potential loss of these individuals be offset by mitigation measures, with appropriate partners, funding, and time-frames for implementation specified. A commitment to implement mitigation should be included in the Final EIS. The mitigation should include the following:

- Collection of seeds (no other propagation method works for this species) prior to the beginning of construction. With only 70+ plants, it should be possible to collect seeds from all individuals that flower between now and the time construction starts in that area.
- Propagation of plants for reintroduction purposes. The viability of these seeds in storage is unknown, so they cannot be collected and held for any length of time. The Army has a collection and propagation permit from the Service, which includes this species. Propagation of collected seeds should be initiated in preparation for reintroduction. Since the viability of these seeds in storage is unknown, any extra seeds (in addition to those seeds collected for immediate propagation) should be sent to National Tropical Botanical Garden to test standard storage methods and to National Seed Storage Laboratory in Fort Collins to test cryopreservation methods; and

■ Suitable habitat (rocky outcrops, chider, or pahoehoe cracks) for potential reintroduction of plants should be located in an area where threats will be or have been minimized. Since ungulates are a major threat to this species, the occupying will need to occur within a fenced area. The fencing will require annual monitoring and maintenance. While the Army has plans to fence three areas within PTA to protect and restore native plants, only one of the three sites is potentially suitable for outplanting of *S. hawaiiensis*. The fenced areas planned at the Multi-Purpose Range Complex and Pu'u Ka Pele are not suitable because they do not have many rocky outcrops and because a closely related species, *Silene lanceolata*, occurs naturally in both of these sites (There is chance of hybridization occurring if these two listed species are grown side by side). The area to be fenced within Kipuka Kalawamama (1300 acres) may be suitable but will have to be surveyed to determine if there are likely sites for reintroduction. Participants in this survey should include botanists from PTA, the consultants, the Service, and Colorado State University, if they are available and on Hawaii Island at the time of the surveys. Kipuka Kalawamama has the most similar habitat to the plants found within the road corridor. If no suitable area is found within the Kipuka Kalawamama fence, other potential sites within or near PTA will need to be

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- Fencing**  
The plan should state that a qualified botanist should survey all proposed fence lines prior to any clearing or fencing to ensure that the proposed area is free of endangered or rare species. If such species are located, fence lines should be modified to avoid impacts to these species.
- A70** Puu Mali. The paddocks on the east and west side will help to create a fire break. Please address the need for firebreaks on the north and south side of the parcel.
- A71** Kaohu Lease Land: The paddocks on the west and east will provide fire breaks. Please address the need for fire breaks on the north and south side.  
If fire breaks are deemed unnecessary for the North and South sides of each of these parcels, this should be clearly stated.
- A72** The map legends should be consistent between all three plans.
- Cattle Grazing**  
The primary purpose of the paddocks should be identified. A statement to the effect of "in order to balance the interests of all members of the Oversight Committee, cattle grazing will be allowed in paddocks as an experimental fire control method. The Oversight Committee will evaluate the effects of such grazing in order to ensure that it does not counter the stated goal of regenerating mamane forest" would suffice.
- A74** According to figure 1 (Puu Mali Pailia Mitigation Site), the area designated for grazing contains substantial remnant forest. According to a discussion with Mr. Reggie David, the area is primarily pasture. Please provide current maps that correctly delineate vegetation types. If such maps are not provided, the text will have to reconcile grazing with the stated goal that the proposed actions shall "not compromise the number one priority that these lands are being set aside for, which is the restoration of a mamane forest suitable for the re-introduction of Pailia".
- A75** Please include a detailed discussion of the proposed grazing regime and subsequent monitoring.
- A76/77** Figure 1 for the Kipuua Alala and Kaohu Lease Land Plans should also delineate forested areas.  
Kaohu Lease Land: The dimensions of the cattle grazing paddocks need to be identified in the text and on figure 1.
- A77** The area within the paddocks should be surveyed for the presence of rare, threatened, or endangered plant species. Measures should be taken to protect such species (e.g., modifying the grazing regime and/or construction of small scale enclosures).
- Hunting**  
This section should address the goals and methods for feral ungulate control. Subsequent monitoring efforts should be discussed in "Monitoring and Data Collection".
- A78** The Puu Mali and Kaohu Lease Land management plans state that game bird hunting may be halted if the Oversight Committee believes the risk of unplanned fire ignition is too high to warrant the risk. While it may be unlikely, the decision to halt game bird hunting may be made for other reasons unrelated to fire risk, such as risk of harassment to the birds from gunfire. The plan should state that game bird hunting may be halted if the Oversight Committee believes there are risks to the Pailia recovery effort, such as a high risk of unplanned fire ignition.
- A79**

### Monitoring and Data Collection

- This section should be placed at the end of the plan after all the management actions are discussed.
- A80** The baseline surveys should include a map of vegetation types, the general composition of each vegetation type, and detailed information on locations of rare, threatened, and endangered plants. The Service recommends that any rare plants in areas designated for grazing or mowing should have small fences erected around them for protection.
- A81** The Service recommends that more detailed information about the methodology for vegetation monitoring and how restoration success, or lack thereof, will be determined be included in the final EIS. We also recommend that monitoring techniques for other restoration measures be included as well, such as monitoring for the success of manual/chemical weed control, predator control, ungulate control, invertebrates, and pathogens.
- Habitat Restoration**  
This section should identify and discuss all techniques for mamane forest restoration to be used including cattle grazing, mechanical/chemical weed control, outplanting, scarification, and passive regeneration.  
It may be helpful to select a mamane forest elsewhere for use as a control to monitor the success of various restoration techniques.
- A82** In each management plan, the only method of alien plant removal mentioned is the use of cattle grazing to reduce fuel load. However, other introduced plants threaten Pailia habitat (e.g. *Senecio milanioides*) and will require manual and chemical control.
- Predator Control and Monitoring**  
A section entitled "Monitoring and Data Collection" already exists. Predator monitoring should be discussed in the monitoring section. This section should address only predator control and discuss specific management actions for each predator threat.
- A83** The Puu Mali management plan calls for expansion of the "current predator monitoring and control programs that are ongoing in the MKFR above this site...". This current program should be described. Further, methods to control predators and monitor the results should not be limited to those methods currently being used, but should also allow for broader-scale and/or more effective methods that may be adopted for use in the future, such as aerial broadcast of rodenticides.
- A84** If predator control will only be centered around nest trees, the actions should be expanded, since other species are also impacted by these predators, including the species of concern *Dubautia arborescens*.
- Fire Ecology**  
Kaohu Lease Land: The plan states that one third of the parcel will be mowed in varying patterns to produce fire breaks, stimulate mamane regeneration, and allow easier hunter access. Because the decision to mow is primarily to provide gamebird habitat and hunter access, explaining mowing in terms of mamane regeneration only casts doubt upon the biological integrity of the plan as a whole. Following is a possible revision: "In recognition of the fact that gamebird hunting is a valued form of recreation by the public, and that this parcel in particular, is of value to the hunting community, one third of the parcel will be mowed to support gamebird access. Such mowing is not expected to compromise the ultimate goal of mamane restoration because corridors will be realigned if mamane saplings appear and because such corridors will provide an important fire break."
- A85**

A86 The management plans should identify who will be responsible for funding the fire ecologist position and who will be responsible for drafting the fire management plan with risk assessment protocols and guidelines.

Section 6. Cumulative Impacts

A87 In this chapter, cumulative impacts are identified as: "The development of Saddle Road would add to the cumulative impacts on the physical, biological, and cultural resources of the island. It would require acquisition of land, the conversion of native habitat and existing land uses, and it would result in the partial loss of some cultural resources. It would improve access, result in an increase in traffic volumes, and be expected to increase public use of the area."

A87 As mitigation, the Service recommends the development of an ecological and cultural resource education and information system implemented across the length of the project. This system could include information regarding the nature of plant communities located along the project corridor and their uniqueness statewide and globally. It could also illustrate the numerous rare plant and animal species found in various habitats of the project and identify the threats to these ecosystem components. This set of information should be tied to the Hawaiian culture and their spiritual and cultural dependence upon the integrity of these systems. Finally, archaeological resources from the area could be discussed and identified. A system such as this could help to increase public awareness of trust resources along the project corridor and their importance to Hawaiian culture and ecosystems. This measure would potentially help reduce the long-term impacts to resources affected by the project.

In summary, wetland mitigation will be necessary, and can be designed in a way that offsets habitat loss and helps to protect habitat for endangered plant species that are expected to be adversely impacted by the project. We recommend that the details of this mitigation plan be worked out with Army Corps of Engineers personnel as the project develops. The Service recommends that appropriate mitigation be developed for *Cyanea platyphylla*, *Clermontia periana*, and *Silene hawaiiensis*. Mitigation for expected adverse impacts resulting from an increase in alien species introduction and dispersal need to be more thoroughly addressed. Impacts to unlisted rare species and permanent losses of unique plant habitats are expected to occur and, therefore, should be addressed. Identification of the unique nature of these habitats and possible mitigative measures should be addressed. Finally, the potential impacts resulting from fire started along upper portions of section I and II need to be thoroughly addressed and mitigative measures identified. Establishment of a mitigation trust fund to support long-term mitigation protection and management should be explored.


If you have questions regarding the above fish and wildlife resources comments, please contact the Field Supervisor, Ecological Services, Honolulu, Hawaii or Don Palawski, Assistant Supervisor/Habitat Conservation, Pacific Islands Office, at 808-541-3441.

SUMMARY COMMENTS

The Department of the Interior has no objection to Section 4(f) approval of this project by the Department of Transportation, providing that the mitigation measures to historic and archeological resources, including native Hawaiian burial and ritual sites, are coordinated with and approved by the State Historic Preservation Officer, and evidence to that effect is documented in a Final Section 4(f) Evaluation which should be made part of the Final EIS.

We appreciate the opportunity to provide these comments.

Sincerely,



Willie R. Taylor  
Director, Office of Environmental  
Policy and Compliance

cc: Kazu Hay Ashida  
Director of Transportation  
State of Hawaii  
Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097



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DEC 29 1997

In Reply Refer To: MSS

Mr. Larry Smith, P.E.  
Division Engineer  
U.S. Department of Transportation  
Federal Highways Administration  
555 Zang Street  
P.O. Box 25246  
Denver, Colorado 80225-0246

RECEIVED  
JAN 7 1998

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Dear Mr. Smith:

The Honolulu office of the Fish and Wildlife Service (Service) received a copy of the Biological Assessment (BA) and your cover letter dated November 06, 1997 on November 12, 1997, requesting initiation of formal section 7 consultation under the Endangered Species Act. The consultation concerns the possible effects of the proposed improvement of State Route 200, Saddle Road, from the Mamalahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawaii, on the listed and proposed species of the island of Hawaii and designated critical habitat of the pallid (*Loxia* *palmeri*).

ABB

All of the information required of you (50 CFR 402.14) to initiate consultation was either included in your BA or is otherwise accessible for our consideration and reference. Fish and Wildlife Biologists of our office have been in contact with your consultants to discuss various aspects of the BA.

ABB

The BA has provided:  
a description of the action being considered,  
a description of the specific area that may be affected by the action,  
a description of any listed species that may be affected by the action,  
a description of the manner in which the action may affect any listed species or critical habitat and  
an analysis of any cumulative effects,  
relevant reports, and other relevant studies or information available on the action.

We have assigned log number 1-2-98-F-01 to this consultation. Please refer to that number in future correspondence on this consultation.

Section 7 regulations allow the Service up to 90 days to conclude formal consultation with your agency and an additional 45 days to prepare our biological opinion (unless we mutually agree to an

extension). Therefore, we expect to provide you with our biological opinion on or before March 27, 1998.

As a reminder, the Endangered Species Act requires that after initiation of formal consultation, the Federal action agency make no irreversible or irretrievable commitment of resources that limits future options. This practice ensures agency actions do not preclude the formulation or implementation of reasonable and prudent alternatives that avoid jeopardizing the continued existence of endangered or threatened species or destroying or modifying their critical habitats.

ABB

If you have any questions or concerns about this consultation or the consultation process in general, please feel free to contact me or Interagency Program Lead, Ms. Margo Stahl at 808/541-3441.

Sincerely,

*Margo Stahl*  
Margo Stahl  
Field Supervisor  
Ecological Services

cc: Richard Hill, USFWS Region I  
Bert McCauley  
Reggie David



U. S. Department of the Interior  
 U. S. GEOLOGICAL SURVEY  
 BIOLOGICAL RESOURCES DIVISION  
 PACIFIC ISLAND ECOSYSTEMS RESEARCH CENTER  
 University of Hawaii  
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 PHONE (808) 956-5691 FAX (808) 956-5687

19 December 1997

Mr. Bert McCauley  
 U.S. Department of Transportation  
 Federal Highways Administration  
 Central Federal Lands Division  
 555 Zang Street  
 Lakewood, CO 80228

Dear Mr. McCauley:

I wish to comment on the draft Environmental Impact Statement documents prepared by your office for the Saddle Road (Hawaii State Route 200). The draft documents clearly and comprehensively present results of biological surveys, consider major problems which may result from the proposed realignment and improvement of Saddle Road, and suggest practical and justifiable mitigation measures. The biological surveys seem entirely adequate and appropriate for the scope of the project. The bird surveys were especially thorough, and knowing R. E. David's talent for finding and identifying bird species, there can be no doubting the accuracy and completeness of the results.

It also is clear that considerable effort was made to solicit opinions and suggestions from a variety of experts. I am especially gratified that you and others associated with the project consulted extensively with biologists knowledgeable about Palila and their habitat requirements, among other issues. Biologists who have spent the past nine years investigating Palila life history and limiting factors are confident that the mitigation plan is appropriate, reasonable, and complete. If implemented properly, it will very substantially enhance the recovery of Palila on Mauna Kea. Furthermore, the plan should provide considerable impetus to federal and state agencies for developing and implementing a comprehensive plan for recovering the species and its habitat elsewhere in its historical range, including Mauna Loa and Hualalai volcanoes. Without this mitigation, it is difficult to say when more significant recovery actions might be initiated.

I am very encouraged that the mitigation plan appears in the draft documents in the same basic configuration as when it was conceived among biologists and resource managers. Because its content and form remain intact, biologists familiar with Palila conservation problems can continue to endorse it. I thank you and other associated with the planning of the project for taking our concerns and suggestions seriously and for facilitating the development of the mitigation plan.

As well-conceived as the plan may seem, it is worthless unless carefully implemented. Therefore, I would like to suggest an alternative to an Oversight Committee composed of federal and state agencies for conducting the "adaptive management" proposed in the draft biological assessment. I believe it would be more efficient and effective to contract the implementation of the plan to an independent

entity, such as the Research Corporation of the University of Hawaii (RCUH). The entity selected should be unencumbered by potential conflicts of interest with the main objectives of the mitigation plan in terms of resource management philosophies and policies. More specifically, the contractor should be capable and eager to administer and implement the plan in accordance with the primary goal of benefiting the natural resources. It also seems likely that a single entity dedicated to a mandate of this complexity would be quicker to respond to changing conditions and unanticipated problems. In addition, the contractor should have considerable experience, infrastructure, and credibility for enabling competent resource management and research. Even if an independent entity is contracted to carry out the plan, important stakeholders could contribute ideas to the plan in an advisory role, if this was specified in the contract.

Again, you are to be congratulated on offering a mitigation plan, which if implemented as intended, will considerably assist the recovery of Palila, its habitat, and associated species. It also provides for much needed fire management of the unique dry forest that supports Palila and many other endemic species. Finally, it is noteworthy that the plan does not exclude the public from lands intended to be managed for Palila. Indeed, the plan would enhance sport hunting and other opportunities for the public to enjoy their natural resources.

Sincerely,

Dr. William W. M. Steiner,  
 Genier Director

OKAHARA & ASSOC., INC.  
 KAILUA-KONA OFFICE

RECEIVED  
 JAN 5 1998

A90

A91

A91

A92

DANIEL K. HOIUYE  
HONOLULU

APPROPRIATIONS  
Subcommittee on Commerce  
COMMERCE, SCIENCE AND TRANSPORTATION  
Subcommittee on Surface Transportation  
and Merchant Marine  
COMMITTEE ON PROGRAM AFFAIRS

DEMOGRAPHIC STATISTICS COMMITTEE  
COMMITTEE ON RULES AND ADMINISTRATION  
JOINT COMMITTEE ON PRINTING

United States Senate  
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(202) 224-3934  
FAX (202) 224-6747

FRANCE ZUMBO FEDERAL BUILDING  
ROOM 3224, 200 ALA MOANA BOULEVARD  
HONOLULU, HI 96826-4775  
PHONE 841-2542  
FAX (808) 541-2543

911 ALUHANA STREET, HON. 206  
HONOLULU, HI 96813  
PHONE 521-8079  
FAX 522-9141



STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P.O. BOX 118, HONOLULU, HAWAII 96810

BULLMOCK CAVETTANO  
GOVT. EMP.

11 1718 00 (E) 11730 . 7

October 29, 1997

NOV 26 1997

Mr. Larry D. Henry, P.E.  
Project Development Engineer  
U.S. Department of Transportation  
Federal Highway Administration  
Central Federal Lands  
Highway Division  
P.O. Box 25246  
Denver, Colorado 80225-0246

Dear Mr. Henry:

A93 I would like to acknowledge receipt of a copy of the Draft Environmental Impact Statement for the proposed Saddle Road improvement. Thank you for providing me with a copy and informing me of the upcoming public hearings in Waikoloa and in Hilo.

If I can be of any assistance, please do not hesitate to contact me.

Aloha,

*William Kikuchi*  
WILLIAM KIKUCHI  
Field Representative

WK:acm

RC:jk

Federal Highway Administration  
555 Zang Street, Room 259  
Lakewood, Colorado 80228

Attention: HPD-16, Saddle Road

Gentlemen:

Subject: Saddle Road (State Route 200), 190  
Mamalahoa Highway (State Route 190)  
to Milepost 6, Draft EIS

Thank you for the opportunity to review the subject document. We have no comments to offer.

If there are any questions, please have your staff contact Mr. Ronald Ching of the Planning Branch at 586-0490.

Sincerely,

*Gordon Matsuoka*  
GORDON MATSUOKA  
State Public Works Engineer



BERNARD J. CARTLAND  
GOVERNOR  
MAJOR GENERAL LEONARD B. HICKLINGSON  
DIRECTOR OF CIVIL DEFENSE  
ROY C. PRICE, SR.  
VICE DIRECTOR OF CIVIL DEFENSE



STATE OF HAWAII  
DEPARTMENT OF DEFENSE  
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE  
3749 DUKAKOHE ROAD  
HONOLULU, HAWAII 96816-4155



Mr. Bert McCauley  
November 26, 1997  
Page 2

November 26, 1997

Our SCD planners and technicians are available to discuss this further if there is a requirement. Please have your staff call Mr. Norman Ogasawara at 733-4300.  
We would appreciate your consideration and such expressions of interest you may have on this matter.

TO:

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration (FHWA)  
U.S. Department of Transportation  
555 Zang Street  
Denver, Colorado 80228

FROM: Roy C. Price, Sr.  
Vice Director of Civil Defense

SUBJECT: Draft Environmental Impact Statement, Saddle Road (State Route 200), Mamelaha Highway (State Route 190), to Milepost 6, County of Hawaii, State of Hawaii, FHWA Project No. A-AD-8(1)

State Civil Defense (SCD) appreciates this opportunity to comment on the Federal Highway Administration, U.S. Department of Transportation, proposed improvement of State Route 200, Saddle Road, from the Mamelaha Highway to the milepost 6 near Hilo, Hawaii.

A94 State Civil Defense proposes that a communications conduit with pull boxes be included in the highway design plan. This conduit would be reserved for future State Telecommunications use.

A95 Additionally, other Federal and State agencies need to consider the requirement for facilities such as communications, water, telephone, and power distribution during the design process.

A96 No outdoor warning sirens would be required as part of this application.

A97 The need for an improved roadway is strongly supported, which will reduce response times for emergency vehicles and minimize their danger to emergency responders as well as the public as a whole while driving on this facility.



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. BOX 3378  
HONOLULU, HAWAII 96801

LAWRENCE BRICE  
DIRECTOR OF HEALTH

In Reply, Please Refer to

December 24, 1997

97-239/epo

Mr. Larry D. Henry, P.E.  
December 24, 1997  
Page 2

97-239/epo

Mr. Larry D. Henry, P.E.  
Federal Highway Administration  
555 Zang Street, Room 259  
Lakewood, CO 80228  
Attention: HPD-16, Saddle Road

Dear Mr. Henry:

Subject: DRAFT ENVIRONMENTAL IMPACT STATEMENT  
State Route 200, Saddle Road, from the Hamalahoa  
Highway (SR 190) to Mile Post 6 near Hilo, Hawaii

Thank you for allowing us to review and comment on the subject project. We have the following comments to offer:

Control of Fugitive Dust

The proposed project has some construction activities where potential dust problems may arise. Due to the characteristics of the soil in the area, there is a significant potential for fugitive dust to be generated during the clearing and removal of debris, grading, excavation, and reconstruction of the road. Construction activities must comply with provisions of Hawaii Administrative Rules, Chapter 11-60.1, "Air Pollution Control," Section 11-60.1-33 on Fugitive Dust.

The contractor should provide adequate means to control dust from the road areas and during the various phases of construction. These means include, but are not limited to:

- a. Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potentially dusty equipment in areas of the least impact;
- b. Providing an adequate water source at the site prior to start up of construction activities;

A98

- c. Landscaping and rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d. Controlling of dust from shoulders and access roads;
- e. Providing adequate dust control measures during weekends, after-hours, and prior to daily start-up of construction activities; and
- f. Controlling of dust from debris being hauled away from the project site.

Should you have any questions regarding these issues on fugitive dust, please contact Ms. Crystal Peitier of the Clean Air Branch at 586-4200.

Clean Water Branch

1. The applicant has submitted a Section 401 Water Quality Certification (WQC) application for the filling of wetlands from Milepost 7 to Milepost 14. Any concerns that we may have regarding this activity will be addressed during the processing of the WQC application.

A99

2. A National Pollutant Discharge Elimination System (NPDES) general permit is required for each of the following activities which discharges into State Waters:

A100

- a. Discharge of storm water runoff associated with construction activities that involve the disturbance of five acres or greater, including clearing, grading, and excavation;
- b. Discharge of hydrotesting water; and
- c. Discharge of construction dewatering effluent.

Should you have any further questions regarding this matter, please contact Mr. Shane Sumida, Engineering Section of the Clean Water Branch at 586-4309.

Noise Concerns

1. Activities associated with the construction phase of the project must also comply with the Department of Health's Administrative Rules, Chapter 11-46, "Community Noise Control."

A101





STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION  
P.O. BOX 421  
HONOLULU, HAWAII 96809

ACQUILINE DEVELOPMENT  
PROGRAM  
AQUATIC RESOURCES  
BOILING AND SOILS REGULATION  
CONSERVATION AND  
RESTORATION  
COWBURNING  
FORESTRY AND WILDLIFE  
LAND USE AND PLANNING  
LAND USE REVIEW  
STATE PARKS  
WATER RESOURCE MANAGEMENT

MEMORANDUM

TO: Glenn Y. Taguchi

FROM: Ed Henry *Ed Henry*

SUBJECT: DEIS Saddle Road Realignment Project

DEC 23 1997

The subject report adequately identifies on page 3-19 that " a permit must be approved by the Board of Land and Natural Resources prior to the commencement of construction of any portion of the Saddle Road project within the SIAJ Conservation District". It also identifies the Identified Land Use element within the Public Purpose item of Chapter 13-5 HAR that the permit application would be processed for Land Board consideration.

A102.a

We have no other comments on the subject DEIS. Should you have any questions, please feel free to contact me.

RECEIVED  
JAN 7 1998  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
Land Division

December 18, 1997

RECEIVED  
JAN 7 1998  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Ref: DLM-GYT97-10311

MEMORANDUM

TO: Dean Y. Uchida  
Administrator

From: Glenn Y. Taguchi

Subject: Draft Environmental Impact Statement for the Saddle Road (State Route 200) Project

I have reviewed the subject Draft Environmental Impact Statement (DEIS) and have the following comments:

1. The use of State-owned lands for any portion of the Saddle Road Project including the Palila Mitigation Plan, shall require the approval of the Board of Land and Natural Resources (BLNR). Said approval will not be required if the Federal Highway Administration (FHWA) proposes to condemn all of the requisite State-owned lands.  
A103
2. Some State-owned lands may be used for the construction of the road, depending on the alignment selected. Besides BLNR approval, all State-owned lands currently under Governor's Executive Order or Proclamation for forest reserve purposes shall require a public hearing for such withdrawal. The withdrawal also requires the approval of the Governor and provides for the right of disapproval by the Legislature.  
A104
3. For the withdrawal of a portion or the whole of any of the State-owned lands demised under any general lease, the withdrawal may be for a public purpose or for other than public use, provided, such land shall, at the time of withdrawal, constitute an economic unit for the intended purpose. Provided further, that the portion of the State-owned lands not withdrawn shall also constitute an economic unit.  
A105
4. Section 3.18.3 Mitigation Measures discusses some of the cost of withdrawing State-owned lands from the operations of four (4) general leases to create additional Palila habitats. The cost should also include the necessary professional fees for surveying, subdivision, etc.  
A106

November 12, 1997

- A107
5. The Oversight Committee shall be advisory only. Should the USFWS and/or BRD/USGS desire control of the State-owned lands, said lands should be acquired by the Federal government at its fair market value and set aside to such agencies.

Should you have any questions, please see me.

c: Gilbert S. Coloma-Agaran  
Deputy to the Chairperson

MEMORANDUM

To: Dean Uchida, Administrator  
Land Division

From: Ralston Nagata  
State Parks Administrator

Subject: Saddle Road Realignment Project  
Ref. DLM-GIT 97-10277

Our Division has been working with the Federal Highway Administration and their consultant, Okahara & Associates, Inc., on alternative alignments for the subject project. The three alignments currently under consideration for Section II are not expected to have any negative impact on the park. We assume later detailed design work will include entry changes to the park road and removal of any former highway remnants bordering the park.

A110

**RECEIVED**  
JAN 7 1998

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

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DIVISION OF  
LAND MANAGEMENT  
Nov 17 10 34 AM '97



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
STATE HISTORIC PRESERVATION DIVISION  
313 SOUTH KING STREET, 4TH FLOOR  
HONOLULU, HAWAII 96813

MICHAEL D. WILSON, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
DEPUTY  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
AGRICULTURE DEVELOPMENT PROGRAM  
AQUATIC RESOURCES  
CONSERVATION AND  
RESTORATION  
ALSO AVAILABLE DIVISIONS  
CONSERVATION AND  
RESTORATION  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
DIVISION  
LAND DIVISION  
PLANNING AND  
WATER AND LAND DEVELOPMENT

REF: HP-AMK

DEC 22 1997

Mr. Larry D. Henry, Project Development Engineer  
Federal Highway Administration  
555 Zang Street, Room 259  
Lakewood, CO 80228

Attn: HPD-16, Saddle Road

Dear Mr. Henry:

**SUBJECT:** Draft Environmental Impact Statement for Saddle Road  
(State Route 200) Mamelahoa Highway (State Route 190) to Milepost 6  
County of Hawaii, State of Hawaii

Thank you for your letter of October 15, 1997 and the opportunity to review and comment on the above referenced document.

As indicated in our review letter of July 31, 1997 on the draft archaeological inventory survey report, we believe that the survey of the proposed project area was adequate, finding a total of 16 significant historic sites. When we have had an opportunity to review the revised report we will probably agree with all of the proposed mitigation measures as outlined in the DEIS for these sites and three others located in relatively close proximity but beyond the area of potential effect. The final mitigation measures will then be stipulated in a Memorandum of Agreement.

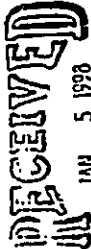
Our office looks forward to receiving the ethnographic report on the possible traditional cultural properties alluded to in Appendix B, "Indigenous Hawaiian Cultural Values."

Aloha,

MICHAEL D. WILSON, Chairperson and  
State Historic Preservation Officer

PM:amk

LOG NO: 20675  
DOC NO: 9712P005



OKAHARA & ASSOC., INC.  
KAILUA-KUNA OFFICE

**interoffice**  
MEMORANDUM

Hawaii Division of Forestry & Wildlife  
Department of Land and Natural Resources

RECEIVED  
DIVISION OF  
LAND MANAGEMENT  
Dec 16 3 00 PM '97

to: Dean Uchida, Lands Division Administrator  
from: Michael G. Buck, Forestry & Wildlife Administrator  
subject: Saddle Road Comments  
date: December 16, 1997

RE: Comments on Draft EIS for Proposed Improvement of the Saddle Road, Island of Hawaii.  
HPD-16E (Saddle Road).

The following comments are provided in response to the Draft Environmental Statement (DEIS) for the proposed improvement of State Route 200, Saddle Road, from the Mamelahoa Highway (SR 190) to Mile Post 6 near Hilo, Hawaii. The draft document was reviewed by Division of Forestry and Wildlife staff from both the Hawaii Branch and Honolulu Administrative offices. This is a compilation of comments from both offices.

**I. GENERAL COMMENTS.**

**Draft Environmental Impact Statement**

Na Ala Hele (Hawaii State Trails and Access Program) has an inherent interest in the historic and prehistoric trails and trail remnants identified in the DEIS. Although the utility of identified trail remnants may be unclear, we wish to be informed on a current basis of any planned alterations or breaches of these alignments. Na Ala Hele specifically endorses the plan of avoidance of the Hilo-Puu O'o Trail in the vicinity of the 18 mile marker with construction of a pull-off area with signage containing locational and historical information.

A111

All attempts should be made to avoid disturbance to kipukas which contain a greater diversity of plant species than the surrounding scrub 'ohi'a vegetation (much of which is designated as wetland). Unfortunately, mitigative measures are deemed necessary for the wetland sections that will be disturbed even though it is the upland vegetation that is most sensitive to disturbance and is biologically most significant.

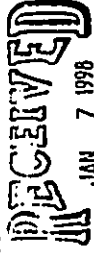
A112

The maps contained within the draft E.I.S. are inadequate at the current scale. One cannot comment on potential impacts to threatened or endangered plants if it isn't clear exactly where the proposed routes go. The proposed routes need to be mapped out on USGS topographic quad maps at a scale of 1:24,000.

A113

There is no mention of plant species that have Federal status but are not yet officially listed as endangered (i.e. *Chamaesyce olowaluensis* which is a Species of Concern but is not yet listed as endangered). It is probable that some of these threatened and SOC species will be listed as

A114



A114 • endangered during the course of the project and therefore the draft E.I.S. should make mention of these species now so that the E.I.S. does not have to be rewritten at a later date once some of these species become listed.

A115 • The original consultant's reports regarding botanical findings need to be included with the draft E.I.S. because the E.I.S. itself does not include enough information about location, numbers and health of populations of rare plants for us to make well-informed comments about the proposed impacts of this project.

A116 • The destruction of grasslands dominated by hard-stemmed lovegrass is a significant impact that has not been addressed adequately. This ecosystem type is only found in the saddle region of the Big Island and nowhere else world-wide. We find no mention of the rarity of this ecosystem type in any of the EIS documents and think that this issue should be addressed.

**Biological Assessment**

A117 • The Division of Forestry and Wildlife finds that the mitigation actions proposed to offset the actual and potential impacts of construction within Palila critical habitat are ambitious. While there is no denying that the proposed actions are needed for Palila restoration, it becomes a subjective call to balance the tradeoff between the loss of 40+ hectares of unoccupied palila critical habitat and increased fire risk to the high cost of the proposed mitigation measures. The Division does realize the need to protect and restore additional habitat on the north side of Mauna Kea and elsewhere to ensure the long term survival of Palila. We do have some suggestions to lower the cost of the mitigation actions called for in the Draft EIS. They include a reduction of overhead expenses and more flexibility in removing non-forested lands from existing pasture leases in the mitigation area.

A118 • The routing of the Saddle Road Section II through PTA-1 or PTA-2 substantially increases environmental concerns for the entire project. Adverse results are increased fire hazard, loss of hunting areas, increased threats to palila and their critical habitat and high cost of mitigation. The selection of alternate route EX-2 would reduce many of these threats.

A119 • Many of the typographical errors that are contained in the Technical Appendices are repeated in the draft E.I.S. We have not listed the typos that are contained in every appendix or the actual draft E.I.S.

**II. SPECIFIC COMMENTS:**

**Draft Environmental Impact Statement**

A120 • Pg. S-12, para 3. Pohakuloa Training Area has been grazed by cattle and more recently by wild sheep and goats. Despite this, native plant communities exist on a large proportion of the installation.

A121 • Pg. S-12, section S.5.3. Game mammals and game birds should be identified as biological

resources.

A121 • Pg. S-16, Table S.6, Summary of Impacts, Section II. Route PTA-1 would result in more of an impact than the loss of a 14 ha. hunting area. A roadway through the middle of this hunting unit is a major disruption to game. The "no action" alternative is preferable for hunting. The loss of prime game bird habitat is difficult to replace. The improvement of access to hunting areas is not an issue in Section II. In this situation, more access may compound the existing enforcement problem of monitoring access routes.

A122 • Pg. S-20, Table S.6, Summary of Impacts, Section II. Most of route EX-2 will not threaten vegetation or represent a fire hazard since the alignment is situated almost entirely on a younger lava flow.

A123 • Any route other than EX-2 on the eastern side of Mauna Kea State Park will have adverse effects on hunting, soils, vegetation, fire control, birds, mammals and invertebrates.

A124 • Pg. S-24, S.8, para 1, last line. Palila mitigation actions are not necessary as long as EX-2 is the chosen route for Section II.

A124 • Pg. 2-4, 2.2.1, line 3. If route EX-2 were selected, there would be less environmental impact and no need for palila mitigation.

A125 • Pg. 3-7, 3.1.1.2, para 8, line 3. It is incorrect to state that there would be limited impact to hunting of feral animals with PTA-1 and PTA-3 alignments. Game animal populations presently exist along these proposed alignments and would be displaced. Game bird hunting areas would also become seriously fragmented. These routes run through some of the best wildlife habitat at PTA.

A126 • Pg.3-45, Table 3.3.9. Unit G should indicate archery and firearms (muzzleloader) under the Resource/Arms Permitted column.

A127 • Pg. 3-46, 3<sup>rd</sup> para. This sentence should read: In summer of 1997, DLNR initiated a program intended to reduce sheep numbers below 150 animals.

A128 • Pg. 3-48, 5<sup>th</sup> para. Hunting has not been lost in the Laupahoehoe, Kahaualea and Puu Makaala Natural Area Reserves. However, the management goal for feral mammals has changed from sustained yield to liberal hunting. The Kulani Duffer Zone is open for hunting throughout the year by permit only. Game mammal hunting has been lost, however, on the Mauna Kea Forest Reserve and Kaohi Game Management Area due to Federal Court eradication orders.

A129 • Pg. 3-48, 6<sup>th</sup> para, last sentence. Mauna Kea Forest "Preserve" should be changed to Mauna Kea Forest "Reserve".

A130 • Pg. 3-65, 3.3.8.2, EX-2. It would be important to note here that the fire hazard would be greatly reduced as well as the threat to palia critical habitat if this route were chosen.

A131 • Pg. 3-136, 1<sup>st</sup> para, last sentence. "Olopa" should be "olapa".

A132 • Pg. 3-149, 3.14.1.2, PTA-1 and PTA-3. It is important to note that these segments, PTA-1 and PTA-3, present the greatest fire threat to the native forest and palia critical habitat.

A133 • Pg. 3-174: 6th para: The *Clermontia peltana* is located not more than 10-12 m away from the existing road near the 14 mile marker. We are concerned that this species will be either directly or indirectly affected by construction activities in this area unless this stretch of road is re-routed.

A134 • Pg. 3-179, 3.18.3, Mitigation Measures, para 3. It is important to note that these listed mitigation actions (pages 179 and 180) and related costs will be necessary only if segments PTA-1 or PTA-3 are chosen. Segments EX-2 would not, therefore, result in costly mitigation actions for loss of critical palia habitat as none would be taken.

A135 • Pg. 3-180, 3<sup>rd</sup> para. Effort to monitor and control alien species, pests and predators will be initiated by DOFAW under their palia restoration program not by the USFWS.

A136 • Pg. 3-182, 1st para. We are not convinced that a 3 m set-back from the proposed road segment EX-3 for *Plantago hawaiiensis* will be sufficient to safeguard this species survival.

A137 • Pg. 3-219. Abandoned Roadway Segments. Who will provide planting materials? Will native species be utilized? If this is to be the case, seed or cuttings of native species from the area should be collected and propagated prior to reassignment so that an adequate supply of native plant species will be available.

A138 • Technical Appendices - Volume III - Biological Assessment  
Pg. 15, section II, line 1. Alternative EX-2 should be discussed here also. The impression given in this paragraph is that there are only two alternatives. Alternative EX-2 is shown in another volume (DEIS) and is depicted as having the least environmental impact as it is mostly situated on the present alignment.

A139 • Pg. 15. Typographical error: "Pohakaloa" should be "Pohakuloa".

A140 • Pg. 26, 1<sup>st</sup> para. Line 8 should read: "...would allow mamane to be reestablished over a range of recovering palia habitat... Palia may or may not become established in this area even with land acquisition or management of the habitat.

A141 • Pages 30 and 31 are missing from Volume III.

A142 • Pg. 30, 2<sup>nd</sup> para. The Biological Assessment proposes that management of the state lease lands be managed by DOFAW with an Oversight Committee consisting of representatives from USFWS and BRD/USGS. The estimated cost schedules (tables 7& 8) indicate that the USFWS would receive a 25% overhead for implementing the various mitigation projects. DLNR as the land owner is the appropriate agency for contracting out specific work items to BRD or other parties as needed to implement the plan. Further, we recommend that DLNR or a third party, non-profit entity administer funds for the mitigation actions. This would result in a saving in excess of \$1,288,350 to the funding agency over the next 5 years. DLNR would not add a 25% overhead for managing the project, but would contract out jobs and require overhead on limited items such as positions added to the Division personnel counts.

A143 • Pg. 30, 3<sup>rd</sup> para. The Division feels that the current level of detail contained in volume III (Biological Assessment) and set forth in the Appendices B, C and D are more than adequate to guide mitigation implementation. Specific management strategies for the areas can be completed later by the Oversight Committee.

A144 • Pg. 39, Para 2. "threatened" should be "threatened".

A145 • Pg. 43, Table 10. "Cytandra" should be "Cyrandra".

A146 • Pg. 49. A pre-emergent herbicide should be sprayed along road cuts to keep fountain grass at a minimum. Monitoring for fountain grass should be scheduled at least every 3 months, not every 4 months.

A147 • Pgs. 58-62: Appendix A is incomplete... where is page 62?

A148 • Pg. 68, 1<sup>st</sup> bullet, 1<sup>st</sup> sentence. This sentence should read: The area shall be closed to gamebird hunting if in the opinion of DOFAW the risk of unplanned fire ignition is too high to warrant the risk. The mitigation area should not be managed any differently than the adjacent Mauna Kea Forest Reserve regarding hunting seasons and closures for fire hazard. DOFAW will determine when hunting season are opened or closed.

A149 • Pg. 68. Who will be responsible for monitoring the data collection for palia mitigation?

A150 • Pg. 69, 1<sup>st</sup> para. "Mamane will be the dominate...". The word "dominate" should be changed to "dominant".

A151 • Pg. 75, 2<sup>nd</sup> para. This paragraph should note that the Oversight Committee is advisory in nature and has no authority over DOFAW's management decisions on state lands.

A152 • Pg. 77, 2<sup>nd</sup> bullet, first sentence. Same as above



- A153 • Pg. 77, 3<sup>rd</sup> bullet, last sentence. This sentence should read: In the event that they are unsuccessful, DLNR shall conduct a staff hunt as needed to attain the goals of mamane forest restoration.
- A154 • Pg. 88. Needs editing
- A155 • Pg. 89. Needs editing

**Fire Prevention.**

- A156 • The Saddle Road should be adequately posted with Smokey Bear fire prevention signs.
- A157 • The PTA Fire Department should maintain two fire hazard/risk signs along the Saddle Road, one in the east section and one in the western section of the training area. These signs should be based upon the National Fire Danger Rating System. Daily updating of sign information would be required to maintain public confidence in the system.

**Fire Suppression.**

- A158 • All vacant firefighter position at the PTA Fire Department should be filled.
- A159 • Helicopter crews, trained for high elevation water bucket operations, should be available at all times in the event of a fire.
- A160 • Bulldozers stationed at PTA should be immediately available in the event of a fire.
- A161 • Existing access roads leading into the Kaohe GMA and Mauna Kea Forest Reserve should remain open for wildfire control.
- A162 • Care should be taken to prevent the spread of fire prone vegetation, such as fountain grass, during highway construction.
- A163 • The development of fire-models for Mauna Kea and PTA vegetation would help fire fighters predict fire behavior.

**Technical Appendices - Volume V - Social Impact Assessment**

- A164 • Pg. 2-11, Table 2.6. Unit G should indicate archery and firearms (muzzleloader) under the Resource/Arms column.
- Technical Appendices - Volume V - Impacts to Hunting**
- A165 • Pg. 6, Table 2-1. Same correction to Unit G as above.

- A166 • Pg. 10, 1<sup>st</sup> para, last sentence. This sentence should read: In summer of 1997, DLNR initiated a program intended to reduce sheep numbers below 150 animals.
- A167 • Pg. 11, 1<sup>st</sup> para, 2<sup>nd</sup> sentence. Hunting has not been lost in the Laupahoehoe, Kahaulaia and Puu Makaala Natural Area Reserves. However, the management goal for feral mammals has changed from sustained yield to liberal hunting. The Kulani Buffer Zone is open for hunting throughout the year by permit only. Game mammal hunting has been lost, however, on the Mauna Kea Forest Reserve and Kaohe Game management Area due to Federal Court eradication orders.

**III. SUMMARY COMMENTS**

In summary, we are generally in favor of the proposed improvement of the Saddle Road. While the road construction for the PTA-1 or PTA-3 alignments do present serious environmental consequences, we feel that the mitigation measures presented in the Draft EIS are adequate with our recommended changes.

Thank you for the opportunity to comment on the draft environmental statement. If you have questions regarding these comments, please contact me or Paul Coury in the Honolulu Office and/or Jon Giffin, Hawaii Branch Manager, at 974-4221.

cc: Jon Giffin, Hawaii Branch

**Pu'u Mail Mitigation Plan**

The mitigation plan and proposed Resource Management Guidelines for the Pu'u Mail area should be more flexible in the time line and how the state pasture leases are converted into conservation status. If provided the flexibility, the Department may be able to work with the lessees to provide a transition that protects the most important areas with forest cover and allows lessees to continue to use badly degraded and marginal portions if necessary until the leases terminate in 2007. The Department will commit to putting these parcels into forest reserve status as soon as possible and use reforestation as a means to jump start forest regeneration on parcels retained in grazing longer. This approach may be less costly than a mid-term withdrawal with high reimbursement costs and achieve the desired habitat restoration within a slightly slower but adequate time line.

BENJAMIN J. CAVEYTAHO  
DIRECTOR



**STATE OF HAWAII**  
**OFFICE OF ENVIRONMENTAL QUALITY CONTROL**

114 SOUTH KOAHIKANA STREET  
SUITE 100  
HONOLULU, HAWAII 96813  
TELEPHONE: (808) 548-1114  
FACSIMILE: (808) 548-4119

GARY GILL  
DIRECTOR

November 12, 1997

**RECEIVED**  
JAN 5 1998

Mr. Kenneth Au  
Department of Transportation  
Highways Division, Planning Branch  
600 Kapiolani Boulevard, Room 304  
Honolulu, Hawaii 96813

OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

Dear Mr. Au:

Subject: Draft EIS for the Saddle Road Improvements

This is to confirm that the information received for the distribution of the Draft Environmental Impact Statement for the subject project has been verified. Additionally, we would like to make the following comments.

According to the EIS rules, all comments received on the EIS Preparation Notice and the responses must be included in the EIS. Based on our records, two comment letters (enclosed) were not included in the EIS. Please include all comment letters and responses in the EIS. Also, please send the DEIS to the two commenters.

Finally, we would like to inform you that the comment deadline for the DEIS is December 23, 1997.

If you have any questions, please call me at 586-4185. Thank you.

Sincerely,

Jeyen Thirugnanam  
Planner

Enclosure

Attached letters were  
rec'd in response to  
Prep Notice, not DEIS.

B.M. Conway  
12-23-97

A168

71-

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187-C HOKUKAHI STREET  
HILO HI 96720

NOVEMBER 13, 1995  
95 NOV 15 P 1:53

U.S. Department of Transportation  
Federal Highway Division  
Central Federal Land Division  
535 Zang Street  
Lakewood CO 80228

OFFICE OF  
QUALITY CONTROL

Attention: William Bird

and

Department of Transportation  
Planning Branch, Highways Division  
600 Kapiolani Blvd., Room 301  
Honolulu HI 96813

Attention: Kenneth Au

Dear Sirs:

Subject: **Transmittal Notice for Environmental Impact Statement, Hawaii's Saddle Road**

I wish to be considered as a consulted party in the preparation of this environmental impact statement. A summary of my concerns follows:

**I. Impact upon Habitat for Rare and Endangered Species**

The saddle area of the Big Island continues to provide essential habitat for rare birds (especially the endangered *Poila*) and for rare plants, including some only recently discovered. I expect the EIS to address how the realignment of the Saddle Road will affect these species.

**II. Impact upon Growth in East and West Hawaii**

Improvements to the Saddle Road might well mean increased growth in areas that until now have been considered unattractive or infeasible because of poor access. Such areas include portions of East Hawaii above Kaunua City (Mauna Hilo) and agricultural lands above Pu'u 'U'U' Ranch in West Hawaii. Among other factors to be weighed are potential construction in areas of high lava inundation hazard (in East Hawaii); impact to waterbird quality (in both East and West Hawaii); potential for aggravated downslope flooding (East and West Hawaii); loss of potential forest bird and plant habitat (East Hawaii).

**III. Impact upon Astronomical Observatory at Mauna Kea**

Increased nighttime traffic is a predictable consequence of improvements to the Saddle Road. Will this have an impact on viewing conditions at Mauna Kea? Also, the clouds of dust during construction may have consequences to the telescope.

**IV. Impact upon Atmospheric Observatory at Mauna Loa**

The National Oceanic and Atmospheric Administration has an atmospheric observatory on the slopes of Mauna Loa. Will the likely increase in Saddle Road traffic, as a consequence of improvements, have any

been witnessed elsewhere in the state.

With the realignment of the Saddle Road so that it no longer passes through PTA, it is reasonable to expect an increase in off-road vehicular traffic in the Saddle area, close to the base of Mauna Kea. How will rare and endangered plants and animals in the area be affected by this? Also, potential erosion and flooding problems may result. Will any effort be made to discourage off-road travel?

**VI. Weed Control**

At present, many weed species line the Saddle Road. It is to be expected that weeds will follow any new alignment of the road, so that areas now relatively free of weeds will become overgrown with weeds, perhaps to the detriment of native species. Will anything be done to address or control the introduction of weeds into areas where they are not now present?

**VII. Rationale for Project**

As a resident of the Big Island, I question the rationale for this project. Many of us who live here want to keep the Saddle Road as it is, since in its present state it discourages heavy traffic through an area that has an almost wilderness quality to it. Any change in the character of the Saddle Road will inevitably and irreversibly damage the tranquility and beauty of the area. This does not mean to be overruled. As a consequence, I believe that any change in the status quo must be done for clearly stated, understood, and agreed-upon reasons of overriding social value.

Thank you for your consideration of my concerns. I look forward to seeing the draft EIS.

Yours truly,

Paulea Tummons

187-C HOKUKAHI STREET  
HILO HI 96720

cc: Office of Environmental Quality Control  
RUST Environment & Infrastructure

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NOV-17-97 MON 1:14 PM HWY-PLANNING BRANCH FAX NO. 8085871787 P. 4



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95 DEC -7 P2:05

OFFICE OF ENVIRONMENTAL QUALITY CONTROL

December 5, 1995

Mr. James Anderson  
RUST Environment & Infrastructure  
5343 North 16th Street, Suite 400  
Phoenix, Arizona 85016

RE: HAWAII STATE HIGHWAY 200 - SADDLE ROAD PROJECT,  
HILO TO MAMALAHOA HIGHWAY  
AN ENVIRONMENTAL ASSESSMENT AND NOTICE OF PREPARATION OF  
AN ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Anderson:

We have reviewed the Environmental Assessment and Notice of Preparation of an Environmental Impact Statement for the Hawaii State Highway 200 (Saddle Road) Project. At this time, our comment is that we believe the Environmental Impact Statement needs to address the impact of the increased traffic on Waikoloa Road and assess the improvements which will be required to ensure that this major mauka-makai connector will be able to handle the anticipated traffic, civilian as well as military.

Currently, the majority of troop and equipment movement between Kawaihae Harbor and the Pohakuloa Training Area utilizes Waikoloa Road, which was not built to accommodate convoy traffic. Improvements to Waikoloa Road should include, at a minimum, paved shoulders, climbing lanes, and passing lanes to minimize the impacts on civilian traffic of these long, slow-moving convoys and also the probable increase in civilian traffic on the residents and businesses of Waikoloa Village and the Waikoloa Beach Resort.

Your consideration is appreciated.

Sincerely,

Ken Melrose  
Vice President, Development

cc: Office of Environmental Quality Control  
Okahara & Associates, Attn: William Moore  
Dept. of Transportation, Planning Branch, Highways Division, Attn: Kenneth Au  
U. S. Dept. of Transportation, Federal Highways Division, Attn: William Bird  
Waikoloa Village Association, Attn: Russ DeRemer

NOV-17-97 MON 1:20 PM HWY-PLANNING BRANCH

FAX NO. 8085871787

P. 6



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95 NOV 30 P2:58

OFFICE OF ENVIRONMENTAL QUALITY CONTROL

November 29, 1995

Mr. James Anderson  
RUST Environment & Infrastructure  
5343 North 16th Street, Suite 400  
Phoenix, Arizona 85016

RE: HAWAII STATE HIGHWAY 200 - SADDLE ROAD PROJECT,  
HILO TO MAMALAHOA HIGHWAY  
ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Anderson:

As the owner of property which will be impacted by the proposed Saddle Road realignment, and over which one of the possible realignment routes cross, we hereby request that we be a consulted party during the preparation of the Draft and Final Environmental Impact Statements for this project.

We appreciate your cooperation and that of your sub-consultant, Okahara & Associates, in keeping us informed as this project progresses.

Sincerely,

Ken Melrose  
Vice President, Development

cc: Office of Environmental Quality Control  
Okahara & Associates, Attn: William Moore  
Dept. of Transportation, Planning Branch, Highways Division, Attn: Kenneth Au  
U. S. Dept. of Transportation, Federal Highways Division, Attn: William Bird  
Waikoloa Village Association, Attn: Russ DeRemer

BENJAMIN J. CAJETANO  
DIRECTOR



STATE OF HAWAII  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

315 SOUTH BERTANNA STREET  
SUITE 302  
HONOLULU, HAWAII 96813  
TELEPHONE 808-548-1416  
FACSIMILE 808-548-1418

December 23, 1997

**RECEIVED**  
JAN 5 1998

Mr. Kazu Hayashida, Director  
State Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Dear Mr. Hayashida:

Subject: Comments on Draft Environmental Impact Statement for  
Saddle Road, Mamalahoa Highway to Milepost 6, Island of  
Hawaii

Thank you for the opportunity review the subject document. We have  
the following questions and comments.

Lighting describe any plans for lighting the roadway. Highway  
Please describe any plans for lighting the roadway. Highway  
A169 - lighting may impact: 1) operations of the observatories at Mauna  
Kea; and 2) seabirds such the Dark-rumped Petrel and the  
Shearwater. If lighting is planned, please describe the potential  
impacts and mitigation measures.

Alien Pest Species  
As a separate project, the Department of Army is proposing to  
lengthen Bradshaw Army Airfield to 2,439 meters. The longer runway  
would allow planes from further distances to land at the Pohakuloa  
Training Area. Planes arriving from new locations will likely  
introduce alien pest species. The improved roadway and the  
additional traffic will also increase the opportunity for alien  
pest species to spread into native habitats in the area. What is  
the cumulative impact of the runway extension and highway expansion  
on the alien pest species problem? What mitigation measures are  
planned to reduce alien species threat? For more information about  
potential mitigation measures, please refer to section 8 of the  
Kahului Airport Alien Species Biological Assessment (enclosed).

The project hopes to avoid using any outside fill to minimize the  
introduction of alien pest species. In the event that additional  
fill from outside areas are required, what are the proposed  
mitigation measures to reduce the introduction of alien pest  
species?

Mr. Hayashida  
Page 2

A172 **Noise**  
The increase in traffic will elevate noise levels. The noise study  
in the EIS focuses on sensitive "human" receptors such as homes and  
barracks. What are the impacts to sensitive "wildlife" receptors  
(such as bird nesting or breeding areas) near the highway corridor?

A173 **Streams**  
New and replacement bridge and culvert crossings will be  
constructed across various streams. Please describe the impacts of  
the project on the affected streams. The discussion should include  
impacts to drainage, streamflow, water quality, and aquatic  
biology.

A174 **Mauna Kea**  
The proposed roadway improvements will open up the area (including  
the summit of Mauna Kea) to tourists. Presently, there is a major  
concern that the summit may be overused by various parties. How  
will the increase in the number of tourists impact the management  
of the Mauna Kea summit?

A175 **Critical Habitat**  
Highway alignment PTA-1 or PTA-3 would realign Saddle Road to the  
northern boundary of the PTA. This alignment would reduce conflict  
between the roadway and PTA training areas. On the other hand,  
this alternative increases the impact to the Palila Critical  
Habitat. Please consider other options, including but not limited  
to land exchanges and a combination of PTA-1 (West segment) and EX-  
2 (East segment), that could simultaneously achieve the multiple  
goals of improving the roadway, enhancing PTA training activities  
and reducing impact to the Palila Critical Habitat.

A176 **Growth Inducement**  
The proposed project will improve access to vast tracts of  
undeveloped areas including lands owned by the Department of  
Hawaiian Homes Land and Parker Ranch. What is the potential urban  
and commercial development of the surrounding area with the  
project?

A177 **Executive Summary**  
Please include in the summary section the following:  
• Unresolved issues  
• Compatibility with land use plans and policies  
• Listing of permits and approvals

A178 **Unresolved Issues**  
Please include a list of the unresolved issues and discuss how such  
issues will be resolved before the project is implemented.

Mr. Hayashida

Page 3

Should you have any questions, please call Jeyan Thirugnanam at  
586-4185. Mahalo.

Sincerely,



Gary Gill  
Director

c: Highways Division  
U.S. DOT, FHA  
Okahara and Associates

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SECTION 8  
MITIGATION MEASURES

8.1 INTRODUCTION

In general, measures to minimize and/or eliminate the establishment of alien species in Hawaii and thereby prevent their potential adverse effects on listed and candidate species and critical habitats are applicable to entire taxa rather than to specific species or groups of species. That is, a measure that may minimize potential adverse effects of one alien insect species or alien insect family would also be effective against several alien species or families. Therefore, mitigation measures to minimize and/or eliminate alien species adverse effects can generally be developed to cover a wide range of taxa. In 1996, COAPS suggested a ten point action plan to minimize alien species introductions in Hawaii (COAPS 1996). These ten action points are still applicable and in need of further implementation. The measures discussed below generally follow these ten steps and identify means by which those steps could be implemented effectively.

The Biological Assessment Technical (BAT) Panel was asked, at their December 11, 1996 meeting, to discuss and suggest, without reservations, mitigation measures that could effectively intercept alien species inadvertently or purposefully introduced into Hawaii by commercial air travel. Many of the measures suggested at that meeting have been discussed at length by the U.S. Congress Office of Technology Assessment (OTA 1993) and COAPS (COAPS 1996). The purpose of discussing possible mitigation measures at the December BAT Panel meeting was to develop those that could be recommended for implementation within this BA and the Kahului Airport Improvements EIS (U.S. Department of Transportation 1996). It is noted that the BAT Panel suggested mitigation measures are not for a specific alien plant or animal species or group of plant or animal species, or for the impacts resulting from the introduction of alien species into Hawaii, but rather are measures by which alien species introductions in general might be controlled or reduced.

For ease of discussion and logic of implementation, the mitigation measures were divided into three broad categories: Pre-Entry, Port-of-Entry, and Early Detection/Response, with the latter limited to the immediate airport environment. Table 8-1 (at the conclusion of this section) lists the mitigation measures suggested by the BAT Panel. Table 8-2, also at the conclusion of this section, identifies the effectiveness of various mitigation measures against selected groups of alien species that might enter Maui and the State of Hawaii. The following is a brief discussion of each of the mitigation measures proposed by the BAT Panel.

8.2 PRE-ENTRY MEASURES

Pre-Entry measures are those that would occur at the originating point of a trip to Hawaii. These measures could take place when a ticket is issued, at the airport prior to boarding, in-flight to Hawaii, or, conceivably, via sovereign government to sovereign

8.2.1 Pre-Treatment

Several countries already require pretreatment of aircraft by pesticides, either by spraying or a residual treatment, before they can operate in that country. For example, in the Pacific, Australia, Fiji, and New Zealand use the residual treatment method. The U.S. Department of Transportation, the World Health Organization, and the International Civil Aviation Organization have called for a ban on spraying aircraft with passengers onboard. The practice of using residual treatment has also been criticized because of possible long lasting adverse effects on passengers and cargo. Because it would take action by the U.S. Congress to allow or require either spraying or residual treatment of passenger areas of aircraft operating in the U.S., pretreatment of aircraft operating on Maui does not appear feasible, although it does appear effective against flying and crawling insects (see Condren and Traveler, October 1996, p. 72).

8.2.2 Education Programs

Note: This discussion also includes updating FWS and HDOA pest lists (including DLNR lists), the CGAPS education program, and maintaining a list of acceptable alien species. Educational programs are perhaps the most cost effective mitigation measures available. Educating the general public, travel agents, airlines and others in the travel and visitor industries can be done fairly easily and effectively. For example, some airlines, such as Delta, show alien species videos on their flights to Hawaii, while others do not. Incentive programs, accompanied by assistance from the Hawaii Visitors and Convention Bureau to assure sensitivity to the traveling public, could persuade all airlines to show the videos. This measure would assure alien species information reaches a greater number of people traveling to Hawaii, as well as airline personnel. The Pacific Area Travel Association (PATA) could be another vehicle encouraging the showing of alien species videos and distributing alien species information on foreign carriers.

COAPS has performed a vital function in educating the public, with brochures and other publications on the dangers of alien species introductions. Additional funding for continuation of the CGAPS education and brochure programs or transferring this function to another agency should be pursued by all concerned with alien species introductions. Further, periodic alien species education programs for various Federal and State agency staff should be conducted to assure they are kept up to date on which species are considered problematic, as well as new detection procedures, methods and equipment.

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ALIEN SPECIES BIOLOGICAL AGREEMENT

SECTION 8

FINAL

ALIEN SPECIES BIOLOGICAL AGREEMENT

KAHULUI AIRPORT

SECTION 8

8.2.3 Interagency Agreement

Interagency agreements on alien species inspections at foreign airports could be effected with creative incentive programs for the foreign airlines. U.S. designed inspection and training programs could be developed that would greatly reduce the risks of alien species being carried by passengers and aircraft. For example, USDA inspectors in Florida travel to foreign ports for agricultural inspections for fruits, vegetables, and plants destined for Florida. This type of program should be investigated as a possible means to reduce the risks of inadvertent introductions of alien species into Hawaii.

8.2.4 Control Landscaping

The control of landscaping design at foreign airports could also be helpful in decreasing the risks of alien species entering Hawaii. Appropriately selected landscape species, i.e., those that discourage insect habitation, would reduce insect populations in the immediate vicinity of foreign airports. The International Civil Aviation Organization could establish landscape design standards to be followed by all civil aviation authorities. Similarly, the HDOA should review its landscape design standards as a means to reduce insect harboring plants at State airports. Implementation of this measure could be a cooperative effort with the Hawaii Department of Agriculture (HDOA) as well as the U.S. Department of Agriculture (USDA).

8.2.5 Pest Free Certification For Cargo

Pest free certification programs, i.e., requiring foreign carriers to certify their cargo are free of insects or other pests, could be established on an international basis with the cooperation of the U.S. Departments of State and Transportation. This measure, could be coordinated by the USDA, FWS, and HDOA and may require federal legislation and funding, but should be investigated.

8.2.6 Limit Flights From High Risk Areas

Measures limiting flights into Hawaii for potential alien species from tropical and temperate zones that have been determined to be high risk areas would require action by the U.S. Department of State for foreign flights, and USDA and HDOA for domestic flights. While it is possible to limit introduction of plant and animal species from certain areas on a quarantine basis, it is not presently legally possible to stop airline operations or the movement of passengers into or within the U.S.

8.2.7 Prohibit Foreign Flights at Kahului Airport

The BAT Panel suggested possibly prohibiting foreign flights operating at Kahului Airport. At present, Japan Airlines (JAL) has been granted international landing rights at Kahului Airport on a one stop basis, i.e., JAL must stop at Honolulu International Airport prior to landing at Kahului Airport. Foreign landing rights in the U.S. are under the control

SECTION 8

FINAL

ALIEN SPECIES BIOLOGICAL AGREEMENT

KAHULUI AIRPORT

SECTION 8

8.2.8 Risk Assessment

In conjunction with or in place of the mitigation measures suggested under 8.2.6 and 8.2.7, alien species risk assessments for specific countries and airports could be performed prior to the granting of international and/or domestic landing rights at Kahului, Honolulu, or Keahole. These assessments could be similar to those performed now prior to granting permission to introduce new plant and animal species into Honolulu and could be performed by the USDA, FWS, NPS, and HDOA and/or DLNR.

8.2.9 Inspection of All Baggage at Foreign Airports

The inspection of all baggage and cargo for alien species at foreign airports prior to departure could be added to current inspections for other types of contraband. This measure would probably require federal legislation and the cooperation of foreign governments. Agencies responsible for the inspections could be the USDA and FWS, or training of foreign inspectors by these agencies. A high level of confidence in the foreign inspection would be required to avoid further inspections upon arrival in the U.S.

8.2.10 Additional Information on Vancouver Pre-Clearance

All Vancouver, British Columbia, flights are pre-cleared by U.S. Customs for any agricultural material. Because Vancouver has airline hubbing operations, USDA inspectors should be there to assist U.S. Customs. While the passengers are considered low risk for alien species, cargo can be transhipped through Canada without inspection. However, at present, all pre-cleared flights are passenger flights only and no cargo enters Kahului Airport via pre-cleared Vancouver flights. Additional information is needed. HDOA should be included in any pre-clearance agriculture inspections.

8.2.11 Coordination of Federal and State Pre-Clearance Programs

Better coordination of Federal and State pre-clearance programs, such as the integration of data bases, updating FWS and HDOA alien species lists and integration of the DLNR alien species lists and NPS information, should be a high priority of the Federal and State agencies in the control of alien species introductions. Given the apparent State and Congressional political concern regarding alien species introductions, additional funding for this type of action may be obtainable.

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MARCH 1987

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ALIEN SPECIES BIOLOGICAL AGREEMENT

SECTION 8

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KAHULUI AIRPORT

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SECTION 8

FINAL

ALIEN SPECIES BIOLOGICAL AGREEMENT

KAHULUI AIRPORT

SECTION 8

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The inspection of all baggage and cargo for alien species at foreign airports prior to departure could be added to current inspections for other types of contraband. This measure would probably require federal legislation and the cooperation of foreign governments. Agencies responsible for the inspections could be the USDA and FWS, or training of foreign inspectors by these agencies. A high level of confidence in the foreign inspection would be required to avoid further inspections upon arrival in the U.S.

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SECTION 8  
Increasing the number of golf carts and dog kennels at the airport will be part of the planned improvements.

8.2.12 Cross Training Between Responsible Agencies

Another improvement suggested was to increase the number of inspectors and dogs at Kahului Airport. Presently there are seven HDOA inspectors and supervisory personnel and one dog (Beagle) at the airport. To cover existing traffic HDOA needs 11 inspectors and supervisory personnel and two dogs. HDOA currently funds five full time HDOA inspectors for the State Airport System, which includes one at Kahului Airport. The State Legislature in the 1998 Budget deleted HDOA funding for these inspectors and is providing the funding in the HDOA 1998 Budget. Funding for the additional inspectors and dogs will need to be obtained from other sources.

The BAT Panel suggested alien species cross training between USDA, HDOA, FWS and U.S. Customs, such that the personnel from each agency are aware of the procedures and measures used by each to control the introductions of alien species. Cross training would allow each agency to "cover" for the other should it be necessary, as well as assist in the dissemination of alien species information. This measure would also act in concert with the Port-of-Entry airport employee training programs described below in section 8.3.2.

8.3.2 Training Programs for Airport Employees

Provide education for airport employees for alien species training programs, to allow airport employees to recognize the various alien species. Included in this program should be cross training for applicable employees. This measure should be combined with the Pre-Entry education programs described previously. These programs would be for HDOA, alicine, U.S. Postal Service, and other airport employees and should be coordinated and led by USDA, FWS, HDOA, and possibly the NFS.

8.2.13 Permits

It was suggested that a more effective permit system could be developed that would aid in the control of the introductions of alien species. This measure would act in concert with the pest free certification measure described previously. The permit system could be implemented by either the USDA or HDOA or both, and require plant and animal importers to undergo more stringent inspections prior to and upon arrival in Hawaii.

8.3.3 Monitor Kahului Airport Environs for Alien Species

Monitoring Kahului Airport environs for alien species was also suggested by the BAT Panel as an early detection mitigation measure. HDOA will establish a monitoring program at the airport. The program will be developed in consultation with the Bernice Pauahi Bishop Museum staff, and implemented by the USDA Animal Damage Control (ADC) staff and APHIS. ADC are currently under contract to HDOA for similar services.

8.3 PORT-OF-ENTRY MEASURES

Port-of-Entry measures are those that would be implemented at Kahului, Honolulu, or Kona International Airports. Additional facilities, equipment and personnel, as well as improved and expanded inspection procedures were suggested by the BAT Panel as possible measures to minimize alien species introductions into Hawaii. The following are brief descriptions of the various measures suggested by the Panel.

8.3.1 Increase Inspection and Quarantine Facilities

Note: this item also includes items 3, 4, and 5 (state-of-the-art cargo building to include USDA/FWS/HDOA/Customs Requirements, improve HDOA domestic inspection facilities, and increase HDOA inspection/dog) as discussed at the December 11, 1996 BAT Panel meeting. Increased inspection and quarantine facilities at Kahului Airport as the airport expands was suggested by the Panel as a viable mitigation measure. The HDOA is committed to furnishing the USDA and HDOA the facilities and equipment required to meet increased passenger and cargo levels projected for Kahului Airport. Included in HDOA's commitment is a state-of-the-art air cargo building that would include USDA, FWS and HDOA facilities and equipment. The building would be designed per USDA and HDOA requirements for inspections, quarantine and equipment and would be constructed by HDOA. Therefore, this measure has already been incorporated into the Airport Improvement projects.

8.3.2 Quality Control of Inspection Procedures and Efficiency

It was further suggested by the BAT Panel that USDA and HDOA need to undertake a quality control program of present inspection procedures and efficiency. This would be an extensive inspection program that includes random and non-random sampling of passengers and cargo. Implementation of this program would have to be within legal limits but is an extremely important element for improving the control of the introduction of alien species into Maui and the State.

8.3.5 Establish Data Base

A major problem in describing the alien species problem at airports, and throughout the State, is the lack of a data base on interceptions, types of species, origins of species, and accidental and purposeful introductions. USDA, FWS, and HDOA need to maintain a common data base. This measure could be incorporated into the quality control program described above. In Miami, USDA is establishing a Data Base Program and should be

8.3.4 Quality Control of Inspection Procedures and Efficiency

Improving HDOA domestic inspection facilities and equipment will improve existing communication data links between the arrival gates and baggage claim facilities, thereby facilitating processing of agricultural declarations. Included in these improvements would be a public address system at the Baggage Claim area to page passengers. Additionally,

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**8.4 EARLY DETECTION/RESPONSE MEASURES**

The early detection/response measures are limited to the airport environs, which are defined as the Airport area north of Hana Highway, west of East Spreckelsville and East of Kahului Harbor, and are primarily under the control of HDOA. The following briefly describes the measures suggested by the BAT Panel.

**8.4.1 Monitoring Surveys to Establish Baseline Conditions**

It was suggested that monitoring surveys within the airport environs be conducted to establish baseline alien species conditions. This measure should be accomplished in conjunction with the previously noted monitoring program. Because some of the air cargo containers leave the airport to be unloaded at off-airport sites, off-airport sites should be established as permanent monitoring sites. These monitoring sites should be checked by FWS, or if within Haleakala National Park, by NPS personnel. HDOA has suggested performing a survey at Keahole-Kona International Airport to determine if alien species are arriving on direct flights from Japan (note, at present JAL operates 3 direct flights per week into Keahole-Kona International Airport, with daily service expected to begin in January 1997). However, this suggestion has been rejected because there is no direct link to Kahului Airport.

**8.4.2 Establish Rapid Response Interagency Team**

It was suggested that a Rapid Response Interagency Team be established at Kahului Airport to combat known alien species introductions. The team would be under the direction of HDOA with support and implementation by USDA, HDOA, ADC, FWS, DLNR and NPS. Upon notification of the introduction of an alien species, the team would be mobilized to determine and implement eradication efforts or the best method of either controlling the spread of the species. The team would concentrate on the airport environs first and secondly on the remainder of the island if eradication efforts are unsuccessful. HDOA has noted that they have only been able to eradicate one alien species in the past.

Additionally, it was suggested a contingency fund, linked to airport activity and user fees be established. However, the FAA has strict rules and regulations regarding any user fees on passengers or cargo. If this measure is to be implemented, it will probably require federal legislation. This measure should be pursued by USDA and FWS in cooperation with FAA.

**8.4.3 Establish Contingency Fund Linked to Airport User Fee**

The FAA has strict rules and regulations concerning any diversion of airport funds for non-airport activities. Similarly, FAA has strict rules and regulations concerning any user fees on passengers and cargo. If this measure is to be implemented, it would probably require federal legislation. Further, if this measure is to be pursued, in cooperation with

Investigated for applicability at Kahului Airport. The Hawaii Biological Survey at Bishop Museum maintains a database on all native and alien species recorded from Hawaii. Bishop Museum staff are also developing innovative information systems for biological data management. The Bishop Museum staff could assist in the development of the data base.

**8.3.6 Scheduling Airline Flights**

Scheduling airline flights to maximize inspector's schedules was also suggested as a possible mitigation measure. This measure has been attempted at other U.S. airports without success. Passengers generally want to travel at a time that is convenient to them, not the inspectors, and the airlines try to provide the service their customers want. For foreign flights, many Asian airports have nighttime curfews that limit departure times, and thus control arrival times in Hawaii. The HDOA has attempted, without success in the past, to have the carriers spread out their arrival times to increase the efficiency of the airports and inspections.

**8.3.7 Ban Cargo From High Risk Areas**

Banning cargo from tropical and temperate zones that have been determined to be alien species high risk areas was also suggested as a Port-of-Entry mitigation measure. HDOA cannot ban cargo from high risk areas of the U.S. but it can prohibit specific items or species. Similarly, USDA has quarantines on certain products in the U.S. and foreign countries, but neither USDA nor HDOA can ban all cargo from high risk areas. USDA and HDOA could, however, specify packing and handling procedures for cargo.

**8.3.8 Alien Species Airport Committee**

The establishment of a Kahului Airport Alien Species Committee was also suggested as a possible mitigation measure. The airport presently has a Security Committee with many of the same members necessary for the control of the introduction of alien species. The Security Committee's purview should be increased to include alien species and members added as necessary to carry out this function. HDOA, USDA, HDOA, ADC, FWS and DLNR personnel are suggested as possible new members to address alien species issues.

**8.3.9 Control Landscaping**

The Kahului Airport Landscaping design standards should be reviewed to eliminate potential invasive plant species and to be incompatible with alien species. The HDOA should consult with HDOA, USDA, FWS and NPS to update landscape design standards for all State airports.

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the FAA, USDA, and FWS should probably be the primary agencies pursuing the required legislation and implementation measures.

**8.4.4 Investigate Eradication**

After an infestation of alien species is reported and eradication efforts are implemented, a follow-up program by USDA, HDOA, FWS, and NPS should be conducted to determine the effectiveness of the eradication efforts. As indicated previously, HDOA has stated that in their experience they have only eradicated one alien species. Therefore, it should be assumed that the follow-up investigation will also look at containment.

**8.4.5 The Brown Tree Snake Control Plan**

The Brown Tree Snake Control Plan, dated June 1996, should be reviewed to determine if the Plan should include (1) Kahului Airport; and (2) expanded to include to Hawaii State Airports and all states. Because any snake species becoming established in Hawaii is very likely to cause serious harm, and because monitoring and subsequent control, if necessary would be similar for most problem snakes, Option 2, above is preferred.

**8.4.6 Investigate Gaps in Interception of Alien Species**

To improve inspection and interception measures, it is extremely important to learn how each new alien species enters the state. Therefore, USDA, HDOA, FWS and other appropriate agencies should collaborate as necessary to conduct a thorough investigation whenever a newly established harmful alien species is found on Maui. The investigation should determine as much as possible on where the gaps in quarantine procedures are, such as, the origin, mode of transportation, mode of entry and mechanisms used by the invading species, as well as whether it was smuggled and the reasons why, and how it escaped detection.

Based on the mitigation measure suggestions provided by the BAT Panel during their December 1996 meeting, as well as those previously recommended by COAPS and OTA, a recommended program for mitigation is discussed in Section 9, Conclusions and Recommendations.

**8.5 EFFECTIVENESS OF MITIGATION MEASURES**

In Section 6, Impact of Alien Species, a number of selected alien species were discussed as potential impacts to Maui. In Appendix H, the proposed mitigation measures in this section are discussed for these selected alien species. Table 8-2 lists the proposed mitigation measures and their effectiveness for selected alien species.

TABLE 8-1  
PROPOSED MITIGATION MEASURES

Mitigation Measure	Responsible Agency	Alien Species Group
Pre-Entry		
1. Pre-Treatment of Aircraft	USDA/APHIS	Effective against flying and crawling insects and arthropods
2. Education of Public on Alien Species	HVCB/MIDOA/MS&S	Effective against all alien species groups and accidental and purposeful introductions
3. Interagency Agreement on Alien Species Inspection at Foreign Airports	USDA/S&S Department	Effective against all arthropods and mollusks
4. Control Landings at Foreign Airports	Unknown	Effective against arthropods
5. Pest Free Certification	USDA/MIDOA	Effective against arthropods
6. Limit Traffic from High Risk Areas	U.S. State Department	Effective against all alien species
7. Prohibit Foreign Traffic at Kahului Airport	U.S. State Department	Effective against all alien species
8. Risk Assessment of Potential Pests	USDA/MIDOA	Effective against all alien species
9. Inspection of All Baggage at Foreign Airports	USDA/FWS	Effective against all alien species
10. HAZ Additional Information on Vietnamese Plants	USDA	Effective against fruit, vegetable, and plant alien species pests
11. Coordination of Federal and State Pre-Quarantine Programs	USDA/MIDOA	Effective against alien species found on fruit, vegetables, and plants
12. Updating FWS and MIDOA Pest List (Including DLR List)	USDA/FWS/MIDOA	Effective against all alien species
13. COAPS Education Program	COAPS	Effective against all alien species
14. Minimum List of Acceptable Alien Species	USDA/MIDOA	Effective against all alien species
15. Program and Education for Government Agencies	USDA/MIDOA/FWS/MS&S/DLNR	Effective against all alien species



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Table 8-2 (Continued)

Mitigation Measure/Task	Smuggling		Smuggling		Smuggling		Smuggling		Smuggling		Smuggling		Smuggling		Smuggling	
	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling
1. Increase Inspections and Quarantine Facilities	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3	2+3
2. Training Program for Airport Employees to Recognize Alien Species	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
3. Submit Clear-Air Logo Badges to Include USDA/FWS/IDOW/Outpost Requirements	2	2+3	2	2+3	2	2+3	2	2+3	2	2+3	2	2+3	2	2+3	2	2+3
4. Improve IDOW Domestic Inspection Facilities	3	3+3	3	3+3	3	3+3	3	3+3	3	3+3	3	3+3	3	3+3	3	3+3
5. Increase IDOW Inspectors/Depts	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
6. Monitor Kulae Airport Entrances for Alien Species	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
7. Quality Control of Inspection Procedures and Efficiency	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
8. Increase Data Base	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
9. Schedule Alien Traps to Monitor Inspectors/Schedule	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
10. Bus Foreign Pilots	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
11. Bus Cargo from High Risk Areas	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
12. Training Problem and Cargo Handling Practices	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
13. Alien Species Airport Committee	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2

Table 8-2 (Continued)

Mitigation Measure/Task	Smuggling		Smuggling		Smuggling		Smuggling		Smuggling		Smuggling		Smuggling		Smuggling		Smuggling	
	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling	Stowaway	Smuggling
1. Monitoring Services to Establish Baseline Conditions	1	0	0	0	2+3	0	2	0	0	0	0	0	0	0	0	0	0	0
2. Establish Rapid Response Emergency Team	3	2+3	2+3	2	2+3	2	2	2	2	2	2	2	2	2	2	2	2	2
3. Establish Contingency Fund Back to Airport Authority or User Charge	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
4. Establish	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
5. Investigate Incidents in Species	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

Effectiveness Key: 0 = Little Effect; 1 = Somewhat Effective; 2 = Good effectiveness; 3 = Excellent Effectiveness

Source: Table developed by F. W. Howarth, see Appendix II.

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OFFICE OF HAWAIIAN AFFAIRS  
711 KAPITOLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

December 19, 1997

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JAN 5 1998

Kenneth Au  
Hawaii Department of Transportation  
Highways Division  
600 Capelane Blvd., Room 304  
Honolulu, Hawaii 96813

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Subject: Draft Environmental Impact Statement for the Saddle Road  
Mamalahoe Highway State (Route 120) in Milipani 6, Island of Hawaii.

Dear Mr. Au:

Thank you very much for allowing us to review and comment on the above-referenced Draft Environmental Impact Statement (DEIS). The Federal Highway Administration (FHWA) in cooperation with the State of Hawaii Department of Transportation (HDOT) is proposing to improve a 7.8 kilometer section of the Saddle Road. The proposed improvements would upgrade and modernize the Saddle Road to meet contemporary design standards and provide future capacity for anticipated traffic volumes.

The Office of Hawaiian Affairs (OHA) has no concerns with the adequacy of the DEIS as an informational document. OHA finds the DEIS to be very well prepared and comprehensive in terms of information presented. The DEIS explores in considerable detail several alternatives which meet the proposed project's objectives while not singling out one as being the "preferred" alternative.

OHA recognizes that the continued deterioration of Saddle Road is a major transportation and public safety issue, and that the need for improvements to the road is necessary. However, OHA has several concerns regarding potential adverse impacts of the project on the surrounding environment. OHA's concerns with the proposed project

Letter to Kenneth Au  
December 19, 1997 - Page 2

are associated mainly with the alternative routes proposed for the Pohakulua Training Area (PTA).

There are three alternative routes proposed within Section II near the PTA, these are: EX-2, PTA-1, and PTA-3. OHA has serious concerns about Alternatives PTA-1 and PTA-3. The choice of either of these alternatives would produce serious adverse impacts upon the environment.

Alternatives PTA-1 and PTA-3 will directly affect 41.5 ha and 46.1 ha (respectively) of Critical Habitat for the endangered Palila (*Loxoides bailleui*) (Table S.6, page S-22). Figure 3.13.1 (page 3-130) illustrates that the western portion of PTA-1 runs adjacent to the Palila Critical habitat, but that eastern portion of PTA-1 passes directly through it.

The Palila Critical Habitat consists primarily of old growth Mamane forest and contains many native Hawaiian plants. The greatest adverse impact of alternatives PTA-1 and PTA-3 is the creation of disturbance corridors which will facilitate the introduction and proliferation of alien plant species in forested areas currently dominated by native species.

The measures proposed to mitigate the impacts upon the Palila Critical Habitat consist mainly of 1) Limiting the disturbance area 2) Setting aside additional lands to replace Palila Critical Habitat 3) Studying these replacement lands to formulate future management plans, and 4) Implementing control and monitoring actions within these future replacement lands. The problem that these mitigation measures present is that they rely upon the "successful establishment" of future man-made replacement Critical Habitat. For this reason, OHA has serious concerns about jeopardizing existing Palila Critical Habitat (consisting of a stable native Mamane climax community) for the placement of a new road alignment.

Alternative EX-2 appears to be a much more environmentally acceptable. EX-2 entails making improvements and upgrading the existing section of Saddle Road which passes through the PTA. Alternative EX-2 presents a significantly reduced risk of future invasion of alien plant species to the area and it totally avoids any loss of Palila Critical Habitat.

The DEIS indicates that alternatives PTA-1 and PTA-3 would effectively achieve the objective of separating the traveling public from military maneuvers, whereas alternative EX-2 would not (page 2-7). However, it should be noted that alternative EX-2 does achieve both the objective of increasing public safety and increasing the "quality" of military maneuvers on this portion of the Saddle Road. For this reason OHA would not support alternatives PTA-1 or PTA-3.

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Letter to Kenneth Au  
December 19, 1997 - Page 3

We would like to bring to the preparers' attention the following sentence which appears in the Native Hawaiian Cultural Values Section 3.3.8. On page 3-63 a sentence describing Native Hawaiian philosophy and relationship to the forest reads as follows: "Native Hawaiians were creatures of the land and relied on the environment as a lifeline".

A181

OHA finds this statement flawed, and highly inappropriate in terms of the choice of words used. We note that it may be technically accurate to describe all terrestrial biological organisms in the Animal Kingdom as "creatures of the land". However, to describe a race of people in such a manner is culturally insensitive.

A181

More importantly, the statement is incorrect by referring to Native Hawaiians in the past tense. Hawaiian culture is a living vital force. It is not a thing of the past. Native Hawaiians were not "creatures of the land", but are an existing people whose daily life and culture is deeply rooted in and integrated with the surrounding natural world.

A181

With regard to the potential impacts of the proposed project on cultural and archaeological resources, OHA considers the report to be comprehensive and detailed in both the Archaeological, Historic and Traditional Cultural Assessment (Appendix IV), and the Indigenous Hawaiian Cultural Values Assessment (Appendix V). The inclusion of a traditional and spiritual Native Hawaiian perspective on the environment, and interviews conducted with native Hawaiians greatly enhances the informational value of the DIIS.

A182

OHA concurs with the preparers of the DIIS that due to the number of existing archaeological/cultural sites and the potential undiscovered sites within the vicinity of the proposed project area both a archaeological monitor and a cultural monitor should be present during all construction activities.

A183

Particular attention should be paid to the potential ritual sites and burials identified by the local Hawaiian informant Mr. Auwae (pages 3-199 to 3-201). OHA also suggests that in addition to the mitigative measures outlined on page 3-202, the DIIS should state that inadvertently unearthed burials should be referred to the Hawaii Island Burial Council immediately.

A184

On a final note, it appears the surrounding communities are in agreement that improvements to Saddle Road are a necessity and the consensus is in support of the proposed action. However, it has come to our attention that certain segments of the community have expressed concerns over some of the alternatives proposed. The alternatives which seem to be generating the most concern among the hunting community and native Hawaiian homesteaders are again alternatives PTA-1 and PTA-3 in section II of the proposed project area.

A185

Letter to Kenneth Au  
December 19, 1997 - Page 4

The main concern among the hunting community is the potential loss of up to 30 ha of hunting grounds if alternatives PTA-1, and PTA-3 are implemented (table S.6). The information provided in appendix V appears to support the hunters' concerns. The hunting area directly impacted by alternatives PTA-1 and PTA-3 are designated "Unit I" hunting grounds. These Unit I hunting grounds contain an area called "Onuokoihi" which is considered by many local hunters to offer "superior hunting" (Appendix V, page 2-11).

A185


The concern among native Hawaiian homesteaders is the direct loss of approximately 13 ha of Hawaiian Homelands if alternative PTA-1 is implemented (page 3-7). We note that Table S.6 (page S-16) does not indicate that these are Department of Hawaiian Homelands (DHHS) lands which will be lost under alternative PTA-1. This information should be included in Table S.6. The DIIS indicates that alternative PTA-3 would avoid placing a new roadway on DHHS lands altogether (page 2-7). It is important that this distinction be made clear to the Homesteaders and the native Hawaiian community as a whole.


A185

OHA recognizes that the applicant is presently working closely with both the hunters and native Hawaiian homesteaders to resolve any issues of concern. OHA strongly urges that close communication with these groups be maintained so that all community concerns are addressed during the decision making process for a preferred alternative.

If you have any questions or comments regarding this matter please contact Colin Kippen, Land and Natural Resources Division Officer, or Richard Stook, FIS Planner at 594-1755.

Sincerely yours,

  
Randall Ogata  
Administrator

  
Robin Kippen, Officer  
Land and Natural Resources

cc: Donald Okahara, Okahara & Associates  
Bert McCauley, US Dept. of Transportation  
Gary Gill, Director, OI:QC  
Board of Trustees

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Stephen K. Yamashiro  
Mayor



County of Hawaii

15 Airport Square, Room 214 • Kalaheo, Hawaii 96751 • (808) 941-8111 • Fax (808) 941-6333  
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William G. Davis  
Managerial Director

Henry Cho  
Deputy Managing Director

PAUSE 1/22

PAUSE 2/22

Mr. Abraham Y. Wong, 12/22/97  
page 2

ADVISORY COMMITTEE ON BICYCLE AND PEDESTRIAN SAFETY

December 22, 1997

Federal Highway Administration  
Box 50206  
300 Ala Moana Blvd.,  
Honolulu, Hawaii 96850

Attention: Mr. Abraham Y. Wong, Division Administrator

Dear Mr. Wong:

Thank you for the opportunity to comment on the Saddle Road Project on the Big Island.

Our committee members have made various comments as follows:

• There is general approval of the well-paved shoulders. These are a key feature that will encourage bicycle traffic and improve bicyclist safety. However, in our opinion, 8 foot wide shoulders are the maximum desirable shoulder width. Our experience with Highway 130 shows that shoulders wider than 8 feet can become defacto traffic lanes, facilitating illegal, high speed, passing on the right by impatient motorists. This creates a serious hazard to bicyclists and pedestrians using these shoulders.

• We recommend that 18 x 0.25 inch recessed rumble strips be applied to the shoulders of Highway 19. They alert current motorists to the fact that they are drifting out of the traffic lane and onto the shoulder. Bicyclist fatalities and numerous serious crashes on the Big Island have been caused by inattentive motorists drifting onto shoulders and hitting bicyclists from behind.

A186

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• We approve of making the paved fire-break a bicycle path. Appropriate signage should encourage this use. We expect that the bicycle path will be used occasionally by pedestrians, roller bladers, and other non-motorized users. Given the isolated location and the topography we would expect that there would be relatively low volume of non-motorized traffic, and multi-use of the bicycle path will not cause user conflicts.

A188

• We suggest that rest stops with covered shelters, toilets, and potable water be located at approximately the 3,000 foot and the 6,000 foot level on both the east and west sides of the saddle. This would refresh and re-supply bicyclists traveling over the saddle. Rest stops at 3,000 ft. should also permit overnight camping. This will help bicyclists unable to make it to the Mauna Kea State Park at 6,500 feet, and will break their journey into two more manageable parts over two days.

A189

• Solar powered emergency phones should be installed every few miles.

A190

• Waimanue Avenue is not friendly to motorists or bicyclists with its standard narrow traffic lanes and heavy traffic volumes. Therefore, we recommend consideration of an alternative connection into Hilo to minimize additional traffic on Waimanue, perhaps via proposed extension of Puuimako St.

A191

• We support expanded express Hefe-On bus schedules over the Saddle Road, linking Kailua-Kona and Hilo. We are appreciative of the capacity of these buses to carry bicycles and suggest that future schedules accommodate multi-modal commuters in both directions.

A192

Sincerely,

Ron Reilly, Chair  
PO Box 458, Volcano Hawaii 96785  
(808) 967-8603, fax (808) 985-8516





Stephen K. Yamashiro  
Mayor

Diane S. Quitiquit  
Director

### County of Hawaii

DEPARTMENT OF RESEARCH AND DEVELOPMENT  
25 Aufoou Street, Room 219 • Hilo, Hawaii 96720 • (808) 961-4336 • Fax (808) 935-1205  
KONA: (808) 329-5228 • Fax (808) 328-3663  
E-mail: dived@volcanospac.net

December 8, 1997

Mr. Kazu Hayashida, Director  
State of Hawaii  
Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813

Dear Mr. Hayashida:

I am writing to support the proposed project to improve the Saddle Road for cross-island traffic between east and west Hawaii. As proposed the project will provide a safe and efficient route to both sides of the island as well to points between, e.g., Waimea.

A193

Improvement of the Saddle Road will contribute to the economy via savings of time and fuel for commuters; but more significant may be the savings in cost of transportation of materials, fuel, and other products to west Hawaii.

A194

Another important consideration is the accessibility of the Saddle areas to tourists visiting the Big Island. The scenic drive over the Saddle is one that many people would enjoy and the area does provide for a variety of recreational uses. An improved Saddle Road also allows considerable flexibility to visitors with time constraints.

A195

Undoubtedly, the improvement and realignment of the present Saddle Road will prove to benefit Big Islanders in both east and west Hawaii.

Thank you.

Sincerely,

*Diane S. Quitiquit*  
Diane S. Quitiquit  
Director

c: Mayor Stephen Yamashiro  
bc: Current Events  
HIEDB

to file  
Duo



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII  
25 AUPUHI STREET • HILO, HAWAII 96720  
TELEPHONE (808) 961-8660 • FAX (808) 961-8657

December 26, 1997

Okahara & Associates, Inc.  
200 Kohola Street  
Hilo, HI 96720

#### SADDLE ROAD DRAFT ENVIRONMENTAL IMPACT STATEMENT

We have reviewed the subject document and have the following comments.

For your information, the Department maintains existing 8 and 16-inch waterlines along Kaumana Drive within the scope of the proposed project from Country Club Drive to our 300,000-gallon concrete reservoir adjacent to Kaumana City Subdivision.

A196

We will defer comments until being informed by your office of the final route selected.

Should there be any questions, you can contact our Water Resources and Planning Branch at 961-8660.

Milton D. Pavao, P.E.  
Manager

WA:gms

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copy - U.S. Department of Transportation, Federal Highway Administration

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KAILUA-OHIA OFFICE

... Water brings progress...

**SECTION 4 - PUBLIC COMMENTS AND RESPONSES REGARDING  
DEIS**

## SECTION 4 - PUBLIC COMMENTS AND RESPONSES REGARDING DEIS

### 4.1 Summary of Public Comments and Responses

This section of the FEIS summarizes the comments received from the public as a part of the formal comment period for the Saddle Road DEIS (Table 4.1.1, *Numerical Listing of Summary of Public Comments and Response*). It summarizes both written correspondence (ref: FEIS - Part II, 4.2) and oral hearing testimony (ref: FEIS - Part II, 2.2). Each comment summary is numbered or coded for easy reference. The copy of the hearing transcripts and the letters received are marked in the margin with the applicable comment codes. Immediately following each comment summary in Table 4.1.1 is the response prepared by the FHWA consultant team. Many responses also refer the reader to those sections of the FEIS where additional information is presented on the issue. Some comments refer the reader to the response to other comment summaries.

Comment summaries and responses are also provided in Section 3.1 for agency comments received. For distinction between the public and agency comments, agency comments were coded with an "A" for agency, or A1, A2, A3, etc.

For clarification, the public comment summaries in Table 4.1.1 are italicized; the responses to comments are in standard type. The summaries were prepared to represent the sentiment of one or more commenters and do not necessarily state any one person's comments verbatim.

**TABLE 4.1.1**  
**Numerical Listing of Summary of Public Comments and Responses**

<b>Code</b>	<b>Comment Summary and Response</b>
1	<i>Commenter supports improvements to Saddle Road because of the increased safety and economic benefits it would bring to the Island.</i> Refer to FEIS - Part I, 3.4.
2	<i>Commenter does not support Segment W-2 because of the impact it would have on the current and future residents of the Waiki'i Ranch.</i> W-3 has been selected as the Recommended Alternative. Refer to response to Comments 5 & 7.
3	<i>Segment W-2 is too close (1200 to 1500 feet) to Waiki'i Ranch?</i> Refer to response to Comments 5 and 7.

**TABLE 4.1.1**  
**Numerical Listing of Summary of Public Comments and Responses**

4	<p><i>With the selection of W-2, traffic noise will have a serious adverse impact on the residents of Waiki'i Ranch.</i></p> <p>Refer to response to Comment 7.</p>
5	<p><i>With the selection of W-2, property values in Waiki'i Ranch would be adversely impacted. Have studies or appraisals been done? Economic impacts on Waiki'i Ranch should be addressed in Final EIS.</i></p> <p>The W-2 alternative comes to within 335 m of the boundary of Waiki'i Ranch and maintains this distance for approximately one mile before turning northwest. With the selection of Segment W-2, its proximity to Waiki'i Ranch may have both adverse and positive impacts on boundary lots in this area. Potential adverse impacts would be increased noise and traffic. Positive impacts would be improved access for property owners to this area of the ranch. The possibility exists that W-2 could have minor adverse impacts on the value of those properties located along this portion of the western boundary. However, as stated in the FEIS (ref: FEIS - Part I, 2.5), Segment W-3 was selected as the recommended alternative for the Saddle Road improvements within Section I of the study area. With W-3 as the recommended alternative, the proposed new corridor for Saddle Road would be located at a greater distance from the Waiki'i Ranch community (approximately 5.6 km). Studies of economic impact/property values were not considered warranted, since W-2 was not selected as the recommended alternative.</p>
6	<p><i>With the selection of W-2, automobile lights will seriously impact residents of Waiki'i Ranch.</i></p> <p>Refer to response to Comment 7.</p>
7	<p><i>With the selection of W-2, noise and lights from vehicles will have a negative impact on livestock operations of Waiki'i Ranch property owners.</i></p> <p>Additional noise analyses for design year traffic examining the impact of the W-2 alignment indicated that there would be a substantial increase over ambient noise levels within the <i>Waiki'i</i> subdivision with construction of this alternative. However, the elevated noise levels would not exceed the NAC at the southern boundary of the subdivision. Presently, no homes are located within the noise impacted area.</p>

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	<p>The impact of these increases on ranching operations is undetermined, however, the calculated noise increases do not exceed the NAC for this land use activity.</p> <p>Vehicles operating uphill at night would direct headlights into the boundaries of the subdivision along some segments of the grade. It is logical to assume that impingement of headlights into <i>Waiki'i</i> would serve as a possible nuisance to this otherwise dark pastoral landscape, however, the magnitude of the effect is undetermined.</p> <p>As stated in the FEIS (2.5 Selection of FHWA-Recommended Alternative), Segment W-3 was selected as the recommended alternative segment for the Saddle Road improvements within Section I of the study area. With W-3 as the recommended alternative, the proposed new corridor for Saddle Road would be located a greater distance from the <i>Waiki'i</i> Ranch community (approximately 5.6 km).</p>
8	<p><i>What would it cost to realign Segment W-2 to a point farther from the Waiki'i Ranch community. Would these costs be greater than the adverse economic impacts on the property owners of Waiki'i Ranch from the selection of W-2.</i></p> <p>Refer to response to Comment 5.</p>
9	<p><i>Would any mitigation funding be available to compensate property owners in the Waiki'i Ranch community for loss of property value?</i></p> <p>The recommended alternative for Saddle Road through Section I is along Segment W-3. With this alignment, it was concluded that no compensation to property owners in the <i>Waiki'i</i> Ranch community would be warranted.</p>
10	<p><i>Many of the residents in Waiki'i Ranch were not aware that the W-2 alignment was so close to their community.</i></p> <p>Refer to response to Comment 7.</p>
11	<p><i>Property owners of Waiki'i Ranch purchased their land for a quiet, rural lifestyle.</i></p> <p>Refer to response to Comment 7.</p>

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12	<p><i>Commenter is opposed to the dead ending of the existing Saddle Road within Section I near Milepost 42. Dead ending the road could add as much as one hour to the daily commute of some residents in Waiki 'i Ranch and the surrounding area, and would cut off these residents from fire protection by the fire department at Pohakuloa.</i></p> <p>Refer to response to Comment 302.</p>
13	<p><i>Use of the existing section of Saddle Road within Section I could be restricted to local traffic by the use of weight limits or other methods.</i></p> <p>Once the new roadway is constructed, it is anticipated that the existing road will be used by mostly local traffic. With higher speeds, a safer design, and total savings in time by using W-3 between Waimea and Hilo, motorists will most likely use the new roadway. The County of Hawai'i does not contemplate restricting use of the existing road. Maintenance of the existing road will be provided by either Hawai'i County, HDOT, or both. Maintenance policies, including signing for weight limits or vehicle types, will be set by the maintaining agency when the new roadway is open to traffic.</p>
14	<p><i>The public hearing of December 11, 1997 for Saddle Road was not announced until Sunday December 7, less than one week notice to prepare for the hearing.</i></p> <p>Notice of public hearing and the availability of the Draft Environmental Impact Statement were announced in the Hawai'i Tribune Herald, West Hawai'i Today, and the Honolulu Star-Bulletin on November 11, 1997 and December 3, 1997.</p>
15	<p><i>Inadequate time was allowed for residents to prepare and submit comments.</i></p> <p>Notice of Availability of the DEIS was published in the Federal Register on November 7, 1997 and in the Hawai'i Office of Environmental Quality bulletin on November 8, 1997. Notice of the public hearing and the availability of the DEIS were announced in the Hawai'i Tribune Herald, West Hawai'i Today, and the Honolulu Star-Bulletin on November 11, 1997 and December 3, 1997. The notices also listed public locations where the DEIS could be reviewed and stated that all comments must be received by December 22, 1997 to be considered.</p>

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16	<p><i>An island of this size does not warrant this type of expense. In addition, some residents of Hawai'i would be more likely to use other existing highways for cross-island travel.</i></p> <p>Cross-island travel times between most destinations are reduced considerably, making an improved Saddle Road much more attractive for these destination travelers and thus contributing to economic benefits associated with reduced travel times and the movement of people and goods between businesses (ref: FEIS - Part I, 1.6, 3.3.2, 3.3.6, and 3.4.3).</p>
17	<p><i>Commenter disagrees with assertion that improvements to Saddle Road would improve the economy of East Hawai'i for future jobs.</i></p> <p>Refer to response to Comment 16.</p>
18	<p><i>Project bulletin does not disclose the type of use anticipated at the PTA over the next ten years.</i></p> <p>The DEIS describes the existing PTA facility and its military training capabilities and identifies the more notable future plans (FEIS, 3.1.1.1.2 Military). The project purpose and need includes a need to separate military training activities from civilian traffic. While this separation would improve the quality of military training; there are no plans to increase the quantity of training activities, to change the nature of training exercises, or to expand the mission of PTA.</p>
19	<p><i>Commenter concerned about protecting the wilderness quality of project area.</i></p> <p>There are no designated wilderness areas in the Saddle area (ref: FEIS - Part I, 3.1.1 and 3.3.4).</p>
20	<p><i>The project will irreversibly change archaeological sites, which should be protected.</i></p> <p>Irreversible changes to the archaeological sites in this project represent minor changes to the archaeological site as a whole. To compensate for these minor changes (destruction of small segments due to road construction), archaeologists will be retrieving the data contained within these segments through detailed photographs, measurements, detailed maps, thorough documentary research, interviews with knowledgeable persons associated with the sites, and in some cases, will perform archaeological excavations. The seven sites so impacted are eligible for the NRHP by Criteria D only within the APE.</p>

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	<p>These sites will be enhanced by following plans developed by the FHWA or HDOT in consultation with SHPO to include some minor restoration and interpretive signing in addition to the data recovery efforts previously described. All of these plans will be reviewed and approved by the FHWA, HDOT, OHA and SHPO prior to implementation.</p>
21	<p><i>Commenter concerned that altering Palila habitat could result in extinction.</i></p> <p>Under the terms of the Endangered Species Act of 1973 as amended the federal government is prohibited from any action that might endanger the continued survival of any endangered species. Under Section 7 of the Act, the USFWS is required to ensure that any action taken by a federal agency will not result in such an outcome. The mitigation proposed which is the direct result of a Section 7 consultation with the USFWS is deemed by their biologists to offset any chance that the proposed action will further endanger the Palila, or result in it's extinction (ref: FEIS - Part III, BO).</p>
22	<p><i>Commenter concerned about the lack of success of previous efforts to relocate the Palila.</i></p> <p>Translocating birds is not an exact science, it is not uncommon for efforts to require several attempts, using different techniques, different ages of birds, etc., before success is attained. This has also been shown to be true with regard to the several attempts necessary to establish many of the introduced gamebirds and alien passerine species found in Hawai'i today. Refer to response to Comment 246. The mitigation proposed for the Palila has a sufficient time span included to allow for a high probability of success (ref: FEIS - Part III, BO and MOU).</p>
23	<p><i>Commenter concerned about safety of the use of herbicides in an area with endemic plants and birds.</i></p> <p>On the eastern side of the project in Sections III and IV, roadside areas will be maintained by mowing rather than herbicides and native vegetation will be preserved and restored in all areas within the ROW not essential to operations of the roadway.</p>



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24	<p><i>Serious consideration should be given to closing the PTA. It is a hazard no matter where the road is located, and is a blight on our sacred mountains.</i></p> <p>Currently, there are no plans to close the PTA or restrict operation of facilities therein. The PTA is of vital importance to the economies of the military presence in Hawai'i and the readiness of U.S. forces in the Pacific (ref: FEIS - Part I, 3.1.1.1.2).</p>
25	<p><i>How will the various Saddle Road proposals affect Hawaiian Home Lands?</i></p> <p>Refer to response to Comment A176.</p>
26	<p><i>How will the Saddle Road proposal affect the preservation of traditional trails in the area?</i></p> <p>Preservation of the trails in the saddle area will continue to be under the jurisdiction of the DLNRs Na Ala Hale Advisory Council. The road construction will impact small segments of trails. Archaeologists will make detailed photographs, take measurements and detailed maps, conduct thorough documentary research, interview with knowledgeable persons associated with the trails, perform archaeological excavations, and report on the results of these investigations. This research has been agreed upon in the Section 106 MOA. It is expected to provide new information on the changes in trail shape, location, methods of construction, and reasons for use on the Big Island. Currently, there is much speculation and little research into the issues surrounding trail history. The understanding of the trail history on the Big Island will be advanced by the loss of small segments of the trails. Some trails will be enhanced by providing minor restoration and signage and potentially a pullout for easier access (ref: FEIS - Part III, MOA).</p>
27	<p><i>Will the Saddle Road proposals provide access to the Umi Peace Temple he 'iau in the area?</i></p> <p>The Saddle Road alternatives will not provide access to the Umi Peace Temple. The he 'iau, also known as the Ahu a 'Umi is around 20 km (over 12 miles) away, and none of the roads leading to it will be modified by this project.</p>
28	<p><i>Commenter supports selection of Segment EX-2 within Section II.</i></p> <p>EX-2 does not completely fulfill the project purpose and need (ref: FEIS - Part I, 2.5.2).</p>

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29	<p><i>Palila mitigation is excessive compensation for the incursion of PTA-1 or PTA-3 into Palila Critical Habitat. Loss of 100 acres of questionable habitat does not warrant the exchange of over 9,000 acres of other lands.</i></p> <p>The rationale behind the large acreage of the Palila Critical Habitat replacement lands is detailed in the Biological Assessment (pages 19-32) and the FEIS - Part I, 3.18.3, and is derived from consultation with the biologists from the USFWS and the BRD/USGS (ref: USFWS letter to Moore dated October 1996, FEIS - Part II, 1.4.3).</p>
30	<p><i>The expense and intrusion of taking lands from functioning ranches and military training areas is not justifiable.</i></p> <p>The NEPA and the State's Hawai'i Environmental Policy Act (Chapter 343, HRS) provide a process whereby the total costs and benefits of a project can be assessed. The Council on Environmental Quality Regulations and the FHWA's policy requires that the final decision on the Recommended Alternative reflects a balanced assessment of all social, economic, and environmental impacts (both positive and negative) as well as public opinion. The final decision will be made based on the information provided in the Final EIS. Impacts to ranching and military training areas are discussed in the FEIS (ref: Part I, 3.1.1.1.1 and 3.1.1.1.2).</p>
31	<p><i>Excessive costs for mitigation could serve to discourage funding of the entire Saddle Road project.</i></p> <p>Given the nature of the impact to Palila Critical Habitat and the magnitude of the proposed project, the mitigation costs are reasonable (ref: FEIS - Part I, 3.18.3).</p>
32	<p><i>The Army has prepared an Ecosystem Management Plan and Endangered Species Management Plan for the PTA. Both plans identify the lands east of Mauna Kea State Park as "Sensitive Ecological Area" and "Biological Significant Area." Resultant training guidelines limit military activities in this area. Therefore, moving the roadway alignment to PTA-1 or PTA-3 in order to benefit training is not realistic.</i></p>

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	<p>The referenced plans will still be adhered to after the Recommended Alternative is constructed. The training guidelines still allow training to be conducted in a beneficial way (ref: FEIS - Part I, 3.1.1.1.2). The principal improvement to military training as a result of construction of the Recommended Alternative is that troops deployed in a tactical mode immediately south of the new roadway will be able to stay in a tactical mode all the way to the live fire ranges located along the Red Leg Trail area south of the existing roadway. Currently, they are forced to revert to an administrative mode to cross the existing roadway. An additional benefit is that troops training with night vision equipment will have the lights of vehicular traffic north "behind" them all the way from their deployment/ insertion areas until they engage their targets, this will greatly improve the quality and realism of training.</p>
<p>33</p>	<p><i>An important hunting area for game birds and mammals, known as Trail 1, would be impacted by PTA-1 and/or PTA-3. Commenters stated a number of reasons for the importance of this hunting area: area is easily accessible without 4-wheel drive vehicles, area is adjacent to Mauna Kea State Park, area terrain allows the young and old hunter alike the opportunity to safety hunt (walking is much easier), area provides historical or sentimental value, and area has good habitat for raising game. This area is one of the only areas that can be successfully hunted without dogs. Project would disrupt wildlife and result in lost acreage.</i></p> <p>The FHWA shares the commenter's concern for the hunting resources at Trail 1. The EIS notes that Trail 1 (or at least the portion of Trail 1 that would be impacted in the Humu'ula hunting unit) is very valuable to families, the elderly, and those without four-wheel drives (FEIS, 3.3.4.2, EX-2, PTA-1, and PTA-3. The information concerning sentimental value and dog hunting has been added to the FEIS (ref: Terry 1998, FEIS - Part III).</p>

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34	<p><i>PTA-1 and PTA-3 would result in a greater threat of fire over that of EX-2; fire is the single greatest threat to Palila Critical Habitat.</i></p> <p>All three proposed alignments through the PTA will result in a heightened risk of wildfire. Substantial fire mitigation has been proposed to offset the potential increased fire risk. Included in the proposed fire mitigation are extensive physical barriers to the spread of fire and the separation of vehicles from the vegetated verge areas, a major cause of unplanned ignitions. Additionally, a fire ecologist experienced in high-altitude, dry-plant communities will be hired to produce fire models of the various habitats at risk through this section and develop a fuels management and fire prevention and suppression plan. The PTA fire department's fire-fighting equipment has been expanded, and several 80,000 gallon dip tanks have been added. Three of these dip tanks are in the immediate vicinity of the roadway. Further, if the roadway were not improved, the risk of unplanned wildfire ignition would be greater because of higher traffic volumes (4,000 ADT in 2014) with no roadside physical barriers.</p>
35	<p><i>The No Action Alternative would be a hazard to the environment and to motorists who travel Saddle Road.</i></p> <p>Analysis supports this statement (ref: FEIS - Part I, 2.4.6).</p>
36	<p><i>Commenter supports improving Saddle Road with no reservations or exceptions.</i></p> <p>Comment noted.</p>
37	<p><i>Waiki'i Ranch community is battling foreign weeds to maintain the quality of grazing land for livestock. Introduction of more foreign weeds and grasses as a result of the project may make the fight impossible to win, threatening the fundamental activity of the Ranch.</i></p> <p>Pasture lands within Waiki'i Ranch are dominated by alien species, almost to the exclusion of native species. Improvements to Saddle Road are not expected to result in negative impacts to grazing land quality within Waiki'i Ranch.</p>
38	<p><i>Commenter supports selection of Segment W-2 within Section I.</i></p> <p>W-3 was selected as the Recommended Alternative in Section I (ref: FEIS - Part I, 2.5.1).</p>

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39	<p><i>The project will bring the people of East and West Hawai'i together.</i></p> <p>Analysis supports this statement. Refer to response to Comment 16.</p>
40	<p><i>Waiki 'i Ranch is a master planned community with strict noise and light restrictions.</i></p> <p>Comment noted. Refer to response to Comment 7.</p>
41	<p><i>Traffic volume will not be reduced within Waiki 'i with the selection of W-2. It will be shifted from one side of Waiki 'i to the other.</i></p> <p>The recommended alternative, W-3, is approximately 5.6 km south of and 1,600 km lower in elevation than the Waiki 'i subdivision.</p>
42	<p><i>The location of W-2, downhill from Waiki 'i, will increase noise levels from traffic.</i></p> <p>Refer to response to Comment 7.</p>
43	<p><i>W-2 will have a negative social impact on Waiki 'i Ranch.</i></p> <p>Comment noted (FEIS, 3.3 Social). W-3 has been selected as the recommended alternative in Section I.</p>
44	<p><i>The selection of W-2 will not exceed federal noise standards, however, it will cause a substantial audible impact on Waiki 'i Ranch.</i></p> <p>Refer to response to Comment 7.</p>
45	<p><i>With improvement of Saddle Road, more traffic will use Waikoloa Road, and improvements to Waikoloa Road will be necessary. Commenters suggested a wider road, climbing/passing lanes, a signal (Paniolo Street and Waikoloa intersection), an underpass or overpass, and other improvements.</i></p> <p>Refer to response to Comment 145.</p>
46	<p><i>Improving Saddle Road would be a tremendous benefit to the economy of the island.</i></p> <p>Refer to response to Comment 16.</p>

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47	<p><i>Commenter is opposed to the selection of PTA-1 and the proposed mitigation package for the Palila.</i></p> <p>PTA-1 was selected as the Recommended Alternative in Section II in consultation with the USFWS (ref: FEIS - Part I, 3.18.3 and Part III, BO).</p>
48	<p><i>There have never been any incidents as a result of the military firing over Saddle Road.</i></p> <p>While the potential exists, representatives of PTA know of no incidents or accidents related to the military firing over Saddle Road. Rounds have landed on or near public roads at other military bases. In order to prevent incidents at the PTA, the Army has been proactive in instituting safety measures, including closing Saddle Road for short periods when necessary.</p>
49	<p><i>There are no Palila in the Critical Habitat that would be impacted by this project so why should there be mitigation.</i></p> <p>Refer to response to Comment 47.</p>
50	<p><i>The USFWS would be poor keepers of the mitigation lands for the Palila.</i></p> <p>The State of Hawai'i (DLNR) will retain control of Palila mitigation lands (ref: FEIS - Part I, 3.18.3).</p>
51	<p><i>With selection of W-2, auto emissions will impact Waiki'i Ranch.</i></p> <p>Predicted maximum one-hour concentrations of carbon monoxide were calculated for sensitive receptors at various distances from the roadway centerline for the current traffic conditions and configuration; for the estimated traffic conditions in 2014 without the project; and for the estimated traffic conditions and proposed improvements in 2014. The receptors modeled ranged from a distance of 10 to 100 m from the future roadway centerline. The results indicated that the predicted maximum 1-hour concentrations for 2014 associated with the proposed improvements to Saddle Road may increase slightly over the No Action Alternative due to the increase in the predicted traffic volume; however, predicted concentrations are extremely low and do not exceed either the Federal or State Standards.</p>

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	<p>Because Segment W-2 is located at least 360 m from the closest lot on Waiki'i Ranch, any increase in auto emission pollutant levels would be expected to be notably lower for sensitive receptors along Segment W-2, and Federal and State Standards would not be exceeded (FEIS, 3.7 Air Quality). However, this becomes a moot issue with the selection of W-3 as the recommended alternative.</p>
52	<p><i>Commenter recommends realigning Segment W-2 so that it is not so close to Waiki'i Ranch, but would still connect to Waikoloa Road.</i></p> <p>Refer to response to Comments 5 and 7.</p>
53	<p><i>W-2 and W-3 cross Parker Ranch. Parker Ranch supports selection of either W-2 or W-3.</i></p> <p>W-3 was selected as the Recommended Alternative in Section I.</p>
54	<p><i>Project will increase the mobility of Hawai'i's people as well as benefit user resident communities, including scientists, island commuters, hunters, cultural gatherers, military personnel, commercial users, and visitors.</i></p> <p>Refer to response to Comment 16.</p>
55	<p><i>Commenter suggests the development of adequate roadside turnouts for viewpoints, rest stops, cultural gathering, and hunter stations in conjunction with road improvements.</i></p> <p>Refer to response to Comment 108. Restroom or rest stop facilities are not planned at this time at the proposed pullouts and/or parking areas along the Saddle Road corridor. In their Master Plan, DHHL has proposed a convenience store stop near the intersection of Saddle Road and the Mauna Kea Access Road.</p>

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56	<p><i>Commenter suggests that design features or high-speed transit corridors be identified to consider future transportation needs and transportation systems, such as mass transit, across the island.</i></p> <p>The geometric design of the improved roadway will allow transit buses to operate within the traffic stream at a very efficient level of service. Right-of-way widths will be sufficient to accommodate future expansion to a four-lane facility, which could include use of select lanes for special purpose, peak hour sensitive transit or high-occupancy vehicles should passenger demand and public sentiment require. It does not appear that trip demand in the foreseeable future will support single purpose, fixed-facility, high-speed transit corridors across the Island.</p>
57	<p><i>Commenter states that Palila live above 6,700 feet elevation. This is well above the Critical Habitat in training areas 1 through 4. Commenter states that critical habitat was established in this area in order to prevent the sheep from feeding on the mamane. Commenter states that Palila have never nested in this area. So what is Palila mitigation for?</i></p> <p>Within the last 100 years, Palila were known to be common between just below 4,000 feet in elevation and tree line. The current remnant population has been forced up to much higher elevations. The area within Training Areas 1 through 4, which will be impacted by the Recommended Alternative is well within the breeding range of this species within recent historic times. Under the Endangered Species Act, when the USFWS delineates Critical Habitat they are supposed to consider the expansion of the population, as well as its spread. In keeping with that rationale, it was logical for the USFWS to include suitable Palila habitat within the delineated Critical Habitat even if it was not currently occupied by Palila. The ultimate goal of listing a species is to recover it to a level where no further protection or special regulations are required to ensure the species' survival. Under the Endangered Species Act, any federal action that may have an impact on any listed species or federally delineated Critical Habitat must consult with the USFWS under Section 7 of the Act to ensure that appropriate mitigation is in place so that the proposed action does not further endanger listed species (Cite: Perkins. R. C. L. 1903. Vertebrata (Aves). In Fauna Hawaiiensis, (D. Sharp, ed.). The University Press, Cambridge. <i>For range of Palila within the last 100 years.</i> 50 CFR of Federal Register for Section 7 and Endangered Species Act).</p>



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58	<p><i>Will there be restrictions on the types of vehicles that use Saddle Road?</i></p> <p>HDOT is not considering placing any restrictions on the types of vehicles that may use Saddle Road after it is improved. All types of trucks and passenger vehicles will be allowed to use the road. The action alternatives of the DEIS consider climbing lanes, passing lanes, and pullouts for slow moving vehicles.</p>
60	<p><i>Are more rest areas planned as part of project?</i></p> <p>Refer to response to Comment 315.</p>
61	<p><i>Commenter states that the portion of PTA-1 west of Mauna Kea State Park is not mamane forest or critical habitat. It is an open mixed shrubland with few mamane trees, and even fewer of any significant size. PTA-1 and PTA-3 east of the park is more woody, but it is still more of a shrubland of mixed naio, aheahea, ohi 'a and mamane, with many open and grassland areas, and lava areas. Trees are of small or moderate size. Neither segment is in the right rain, cloud, and elevation area to be the best mamane, or palila habitat.</i></p> <p>Refer to FEIS - Part I, Section 3.18.3.</p>
62	<p><i>Commenter states that he knows of no evidence that mamane forests are sacred or even special in Hawaiian culture. Just because a certain kipuka site may be special or sacred does not make them all special or sacred. The term sacred mamane forest does not belong in the EIS.</i></p> <p>Investigations into traditional cultural use and beliefs concerning places in the project area help to clarify the significance of landforms that are revered by native users. The term "sacred" is used where appropriate in the EIS.</p>

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63	<p><i>The court-enforced near extermination of the wild sheep on Mauna Kea has not changed the Palila Critical Habitat in a significantly positive way, at least insofar as an increase in Palila. Commenter notes from personal observation a great increase in a vine pest covering the mamane trees, and in grass and ground level branches and debris that promote fire damage. Saving the mamane habitat may not increase the endangered Palila.</i></p> <p>The expected results from changing habitat management regimes within a heavily degraded ecosystem often take many years to be realized. It is correct that the preservation of mamane habitat without other measures may not increase the number of Palila; however, any further degeneration of the habitat will most assuredly result in a decrease in Palila numbers (ref: FEIS - Part III, BO and MOU).</p>
64	<p><i>The effect on 100 acres of scrub land or open woodsy areas in Section II by the proposed project is minute compared with loss of mamane habitat caused by grazing leases (e.g. Ka'ohe horse pasture and Humu'ula grazing lands). This problem should be addressed directly with the State of Hawai'i and the Department of Hawaiian Homelands, owners of these lands.</i></p> <p>This problem is not related to the Saddle Road project.</p>
65	<p><i>Fencing off exchange lands and eliminating all ungulates will not keep out the introduced plants because native and game birds readily spread their seeds.</i></p> <p>Comment noted. The fencing of areas to limit feral ungulate access has been proposed to protect habitat from predation by ungulates, not to stop the spread of noxious plant species.</p>
66	<p><i>Pigs create a soil tilling effect which allow native trees and plants a chance to get a start in the packed ground and dense grasses of former ranching areas.</i></p> <p>Pigs, sheep, and goats are some of the most destructive forces at work in native forests in Hawai'i. Contrary to the commenters assertion, feral ungulates (pigs, sheep, and goats) are one of the major predators of new growth in native forests. Many native species have been pushed to the brink of extinction by the impact of feral ungulates.</p>

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67	<p><i>Pigs, sheep, and goats play a role in diminishing vine overgrowth and fire danger. Population control, not eradication, is the answer.</i></p> <p>The impact of pigs, sheep, and goats on the native ecosystem and the conditions that increase the risk of fire are documented in the FEIS (ref: FEIS - Part I, 3.3.4, and Part III, BA and BO). Refer to response to Comment 66.</p>
68	<p><i>Restrictions against nighttime lighting on construction or maintenance equipment after dark between April and October is unnecessary. Commenter has seen no evidence of nesting shorebirds in the area. Numerous nighttime light sources exist on Mauna Kea and the Saddle.</i></p> <p>It is assumed that the commenter is referring to seabirds rather than shorebirds. Scientists do not concur with commenter's assertion – there have been numerous "downing" instances involving both the threatened Newell's Shearwater and the endangered Dark-rumped Petrel on the Island especially on the Hilo side over the years (Rana 1997, Tech. App. Vol. II, page 37-38).</p>
69	<p><i>Steam cleaning and fumigating equipment is wasteful. Hunters, hikers, soldiers, state employees, astronomers, and tourists have entered the numerous roads and trails of these areas for years with their boots, clothes, and vehicles, and the areas already support a vast array of introduced plants and insects.</i></p> <p>In a good faith gesture to minimize the potential further spread of alien weeds and insects that might result from this action, the FHWA and HDOT have agreed to this mitigation, fully understanding that much of the habitat through which the roadway will be improved has been highly impacted by various unrelated users.</p>
70	<p><i>The proposal that more lands would be available to hunters with the project is unsubstantiated in the DEIS. Who would monitor hunters and let them in and out of fenced areas? There is no provision, no plan and no funding.</i></p> <p>A substantial area (about 1,864 ha at Pu'u Mali) of additional hunting land will be supplied with selection of the Recommended Alternative. The details of all aspects of the land management will be implemented by DLNR, but hunting access and monitoring could be handled much as it is in Cooperative Game Management areas.</p>
71	<p><i>Commenter opposed to project. Project doesn't warrant the investment of tax dollars. Less than one percent of the island's residents use Saddle Road per day.</i></p> <p>Refer to response to Comment 16.</p>

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72	<p><i>While the existing Saddle Road suffers from degraded pavement and poorly aligned curves, many roads on the island and in the state are in need of repair. Which should be improved first.</i></p> <p>Decisions about which roadways to improve within the State and County of Hawai‘i are made in the context of overall transportation system planning with priorities based on many factors (ref: FEIS - Part I, 3.1.3).</p>
73	<p><i>A large portion of Saddle Road is within Volcanic Hazard Zone 2, the same level hazard as Kalapana. It is not sensible to invest a huge amount of money into a highway that stands an excellent chance of being inundated by lava.</i></p> <p>Approximately 16 percent of the total recommended alignment for Saddle Road improvements is within Volcanic Hazard Zone 2. Much of the Zone 2 area is within Segment E-3. E-3 was aligned to stay as close as possible to the existing road corridor to avoid impacting sensitive native ecosystems. Moving the alignment in this area would cause unnecessary impacts to these sensitive native ecosystems and unwarranted additional costs when compared to associated risks.</p>
74	<p><i>Little or no concern has been voiced for the reduced quality of the natural environment often encountered by those who stay at Mauna Kea State Park with flares, explosions, gunfire, and low-flying helicopters.</i></p> <p>Flares, explosions, gunfire, and low-flying helicopters will not directly or indirectly result from the implementation of the proposed Saddle Road improvements. It is assumed that comment refers to military activity associated with the PTA. No increase in training activity is anticipated as a result of the proposed Saddle Road improvements.</p>

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75	<p><i>If PTA lands are not adequate for the military training mission, they should move their training exercises to an area sufficiently large to meet their requirements, such as Nevada.</i></p> <p>The Saddle Road project will not include the addition of new land or the subtraction of existing land from PTA holdings. NEPA requires that DEISs discuss and describe all reasonable alternatives including the No Action alternative. The relocation of the PTA training mission from the Island of Hawai'i would not be considered a reasonable alternative for two primary reasons: 1.) the existing facilities and infrastructure at the PTA represent a substantial financial commitment, which with relocation would be abandoned and recreated elsewhere, a very costly proposition; and 2.) PTA is located in this area in order to serve all branches of the armed services located in the Pacific theater. PTA is the only area in the Hawaiian Islands where training activities required to maintain combat readiness at a Division level can be undertaken for those forces stationed in the area. In addition, the relocation of the PTA would have a profound impact on the economy of the Island of Hawai'i and the State as well. Also, relocating the PTA does not address the other primary needs for an improved Saddle Road.</p>
76	<p><i>Commenter wishes to keep Saddle Road as a country road. Development will bring noise, litter, breakdowns.</i></p> <p>Comment noted. The No Action Alternative does not meet the purpose and need.</p>
77	<p><i>There has been talk of closing Mauna Kea Road to the public because of overuse. Improvements to Saddle Road and associated increases in traffic will also increase the number of cars on the Mauna Kea and Mauna Loa roads, inevitably forcing restricted access to these premiere recreational areas.</i></p> <p>Very minimal increase in use of Mauna Kea Access Road can be expected as a result of improvements to Saddle Road (ref: Terry 1998, FEIS - Part III). There are no plans to close Mauna Kea access road.</p>

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78	<p><i>Assertion in DEIS that accident rate for Saddle Road is higher than on other rural, two-lane highways on the Island of Hawai'i is somewhat misleading. How many rural two-lane roads in Hawai'i typically require a transit of 53 miles? Therefore the accident rate per transit is not so far above that for other such roads. At a rate of 5.43 accidents per million vehicle miles, a transit of 53 miles, and a usage rate of 900 cars per day, the accident rate works out to 1 accident every 3.9 days, which doesn't seem to be unusually high.</i></p> <p>The section of existing Saddle Road to be improved by this project is 78 km (48.5 mi) in length. There are numerous 2-lane rural roadways in Hawai'i that are used for commuting purposes by motorists from which the average accident rate of 3.0 ACC/MVM is generated. Reducing the accident rate on Saddle Road to this average can be reasonably predicted to prevent over 150 accidents per year in the design year for similar traffic volumes on an unimproved versus improved Saddle Road (FEIS 3.4.4, Safety).</p>
79	<p><i>Commenter sees no compelling evidence that the accident rate will decline with the proposed construction. Hazard to vehicles as a result of fog will not be eliminated by the proposed improvements.</i></p> <p>Comment noted (refer to response to Comment 78 and 257). While fog conditions will continue to exist at times along the Saddle, the improved roadway will incorporate traffic control devices, signing, pavement markings, and passing lanes which will greatly reduce the hazards associated with fog.</p>
80	<p><i>If heavy traffic is to go over the Saddle daily, one can expect a lot of stranded motorists getting hypothermic with no planned facilities for aiding them.</i></p> <p>Refer to response to Comment 315.</p>
81	<p><i>The economy of East Hawai'i should be helped by the creation of new and forward-looking industries in East Hawai'i, not in creating a freeway for faster access to jobs in West Hawai'i.</i></p> <p>Refer to response to Comment 16.</p>

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82	<p><i>Proponents of the project in effect are suggesting that long commutes from East to West Hawai'i should be encouraged. This is truly unsafe.</i></p> <p>Long commutes on the Island of Hawai'i are commonplace and expected to increase with divergent east and west economic bases. Without improvements to the roadways that support this development trend, hazardous travel conditions would become truly unacceptable.</p>
83	<p><i>SR 19 is only 7.5 miles longer than the Saddle Road route for Hilo to Kona commuters and rises to less than one-half the elevation. Therefore, little actual savings in drive time are to be gained by going over the Saddle.</i></p> <p>The improved Saddle Road would offer a route to Kailua-Kona that is more than 14 miles shorter than SR 19. This reduction, combined with the lack of numerous side roads, driveways, and reduced speed zones, would reduce the travel time to Kona by as much as 20 to 30 minutes.</p>
84	<p><i>Commenter disagrees with assertion that labor-force mobility will increase.</i></p> <p>Refer to response to Comment 16.</p>
85	<p><i>Benefits related to job creation are limited to the construction activities, and will last only during construction.</i></p> <p>Benefits related to job creation will be both short-term and long-term. Short-term benefits will be mostly realized from construction activities. In the long-term, improvements to Saddle Road will decrease travel time and costs, which will stimulate economic activity on both sides of the island. According to the Hawai'i Input/Output Model, 40 percent of employment will be direct and 60 percent will be indirect based upon the average of 60 industries. Conceptually, this means that 1.5 jobs will be created elsewhere in the economy for every job created by construction-related activities.</p>

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86	<p><i>H-3 project on Oahu was finished 20 years late at 20 times the projected budget. Will the Saddle Road project be finished in 2027 at a cost of \$4 billion?</i></p> <p>The FEIS provides a projected schedule and estimated cost for completion of the Saddle Road improvements (FEIS, Table 1.8.1, <i>Implementation Schedule</i>, and Table 2.2.2, <i>Comparison of Action Alternatives</i>). The projected schedule anticipates completion of all stages of this project in the year 2008. The initiation of construction within each section or phase will be dependent on the availability of funding. The construction cost of the Recommended Alternative is \$154,500,000.</p>
87	<p><i>Commenter supports shortest route to Kona.</i></p> <p>In Section I, W-3 provides the shortest route to Kona, and was selected as the Recommended Alternative.</p>
88	<p><i>Commenter concerned that nobody in state knows how to build or design a road.</i></p> <p>Comment noted.</p>
89	<p><i>Saddle Road would benefit tourists traveling between East and West Hawai'i by decreasing cross island travel times. Tourists would be more inclined to lengthen their stay to take advantage of attractions along Saddle Road (International Astronomy Center on Mauna Kea, volcanoes, orchid nurseries, Macadamia Nut Factory, etc.), as well as attractions on the opposite side of the road from where they are staying.</i></p> <p>Analysis supports this statement. Refer to response to Comment 16.</p>
90	<p><i>Saddle Road improvements would help stimulate the Island economy through the addition of approximately 456 full time equivalent jobs during construction and generating a total income of \$14 to \$15 million during that time.</i></p> <p>Analysis supports this statement (ref: FEIS - Part I, 3.4).</p>
91	<p><i>Clarify reference "<u>Halliday Saddle Road Hawai'i Speleological...</u>"</i></p> <p>Information referenced was taken from a letter by Halliday (dated January 1997) regarding the Saddle Road EIS.</p>



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92	<p><i>In section 3.12.1.5 Speleological Resources the first sentence should be simplified to read: <u>Speleological resources, such as lava tube caves and pseudokarst, occur within the project vicinity.</u></i></p> <p>Text corrected in Final EIS.</p>
93	<p><i>Last sentence in Section 3.12.1.5 should include the phrase: <u>too small.</u></i></p> <p>Text corrected in Final EIS.</p>
94	<p><i>On page S-11, 5th full paragraph, second sentence should begin: <u>The topography is pseudokarstic, and ....</u></i></p> <p>Text corrected in Final EIS.</p>
95	<p><i>On page 3-106, Section 3.10.1 paragraph 2, second sentence should begin: <u>The topography is pseudokarstic, and ....</u></i></p> <p>Text corrected in Final EIS.</p>
96	<p><i>On page 3-106, Section 3.10.1 paragraph 5, the second sentence should be changed to read: <u>All of the drainages within the study corridor ultimately discharge to the ocean or to littoral springs through subsurface flow.</u></i></p> <p>Text corrected in Final EIS.</p>
97	<p><i>Section 3.12.2 omits a cave designated as 50-10-31-5003 in Section 3.19.2. The Final EIS should indicate whether this is one of the caves identified by name in section 3.12, and, if not, it should be included in Section 3.12 (presuming that it is a cave as defined in the Federal Cave Resources Protection Act).</i></p> <p>The cave designated as 50-10-31-5003 in Section 3.19.2 is located 96 m west of the existing Saddle Road alignment (Segment EX-2), 500 m south of milepost 35. This cave is a prehistoric site.</p>
98	<p><i>On page 3-128, just below the middle of the page the word <u>Society</u> should be changed to <u>Survey</u>.</i></p> <p>Text corrected in Final EIS.</p>

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99	<p><i>Project will provide an important economic link between East and West Hawai'i.</i></p> <p>Analysis supports this statement. Refer to response to Comment 16.</p>
100	<p><i>An estimate of 14,000 vehicles per day on Saddle Road by the year 2014 is not credible. World oil consumption rose by 2.4 percent in 1996 to 69.55 million barrels a day. Thus, we seem to be on the Petroconsultants' high scenario, with OPEC output hitting an 18-year high of 27.39 mbpd in August of 1997. It seems reasonable to assume that global production will soon be unable to keep up with surging worldwide demand, and that global oil production must peak by the year 2005. What will happen to tourism when the supply crunch comes, and global oil prices triple again? When oil prices triple, who will be able to afford to commute from Hilo to Waikoloa for a minimum-wage job?</i></p> <p>The figure of 14,000 vehicles per day used in the EIS is an estimate based on a combination of observed, historical factors including population growth, increasing visitor counts, growing proportions of visitors renting vehicles, increasing business traffic between the east and west, as well as more commuting. The commenter notes that if the price of oil triples, transportation costs will rise and such trends may be interrupted or even reversed. There are several drawbacks to this one-factor predictive model. First, some amount of transportation demand is fairly inelastic, in that price increases (up to a point) will not substantially reduce demand. Military training, much business traffic, and luxury tourism are examples. Second, this approach does not factor in the ability to substitute existing fuel-efficient vehicles, which could buffer increases in fuel costs. Third, the incentive developed by substantial fuel price rises would in all likelihood generate even more efficient vehicles, perhaps including entirely new technologies. Finally, experts by no means agree on the probability of substantial fuel price rises - at least over the 20 year period examined in this EIS. Many argue that recent supply and price fluctuations are related far more to politics than to actual global supply conditions. Daniel Yergin and Joseph Stanislaw, authors of <i>The Commanding Heights: The Battle Between Government and the Marketplace that is Remaking the World</i>, predict that, at least for the medium term, the growing market influence on petroleum production policy will continue to keep prices at or near current levels.</p> <p>Of course, no one can predict the future. But for the purpose of calculating medium-term traffic values, the most reliable indicator is the historical trend - which is based on the proven results of the joint interaction of dozens of factors - coupled with evaluation of reasonably certain future developments.</p>

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101	<p><i>Light pollution from vehicle headlights on Waiki 'i Ranch could be solved by altering or realigning W-2 or selecting W-3.</i></p> <p>Comment noted. Refer to response to Comment 7.</p>
102	<p><i>There is no evidence that a route further south and west of W-2 was considered for the project.</i></p> <p>Several potential segments south of the W-2 alignment were initially considered and the results documented in the Draft EIS: Segments W-3, W-4, W-5, and W-6 (Figure 2.3.1, <i>Alternatives Considered but Eliminated</i>). Following an evaluation of the alternative segments initially considered, the SEE Team completed a screening process which eliminated some of the potential segments. Segments eliminated either did not meet project criteria or they were largely redundant with other alternative segments and initial data indicated they would have an order of magnitude greater impact. The segments eliminated from further consideration included W-4, W-5, and W-6 (FEIS, 2.3 Alternatives Considered but Eliminated). A summary of the reasons that these alternative segments were eliminated from further consideration is provided in the FEIS (2.3.2.1 Segments Eliminated from Consideration - Section I, <u>W-4</u>, <u>W-5</u> and <u>W-6</u>).</p>
103	<p><i>The Saddle Road project would boost the economy and assist with the problems of unemployment.</i></p> <p>Analysis supports this statement. Refer to response to Comment 16.</p>
104	<p><i>The natural surroundings of Saddle Road deserve an educational/interpretive plan for motorists/tourists. Consideration could be given a designation as a Heritage Corridor with ISTE A support. Responsibilities for this could be initiated by established community organizations and be expended/implemented over time utilizing ISTE A and other funding sources at minimal cost to the highway project.</i></p> <p>Refer to response to Comment 108.</p>
105	<p><i>Consideration should be given to the development of safe turnouts for viewing with appropriate warnings to avoid fire hazards or unsafe access areas.</i></p> <p>Refer to response to Comment 108.</p>

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106	<p><i>Consideration should be given to the provision of interpretive / informational all-weather signage identifying key biological reserves (kipuka), mamane forests, lava flows (by year), historical trails or areas, and potentially, cultural sites.</i></p> <p>Refer to response to Comment 110. Interpretive information on roadside signage is planned for the historical trails and several of the cultural sites. Signage to advise motorists of sensitive biological communities in these areas will also be considered as appropriate.</p>
107	<p><i>Consideration should be given to the provision of information on driving and road warning conditions especially for Mauna Kea summit road and the Mauna Loa cinder road.</i></p> <p>Refer to response to Comment 315.</p>
108	<p><i>Consideration should be given to the establishment of designated gathering points for nature walks, hunting, or horseback excursions with authorized guides.</i></p> <p>In consultation with appropriate jurisdictional agencies, pullouts and/or parking areas will be included in the final design at locations determined to warrant these facilities from a safety, visual, historical, or biological interest consideration. Except where restricted by agencies with jurisdiction, these pullout and/or parking areas could be used for public access to adjacent public lands for the purposes noted in the comment. The roadway will not be designed with full access control.</p>
109	<p><i>Consideration should be given to the provision of safety berms, bikeways, and appropriate natural landscaping in keeping with the areas' s important aesthetic qualities.</i></p> <p>The design for the improved Saddle Road will incorporate all safety features and appurtenances warranted by current national and HDOT highway design standards. Revegetation and construction techniques to present a visually pleasing and naturally unobtrusive roadway will also be included in project specifications. The road will be designed to "lay lightly on the land."</p>

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110	<p><i>Consideration should be given to the provision of printed materials at visitor or educational facilities to augment educational opportunities for student excursions, visitors, and community organizations.</i></p> <p>Printed material and displays concerning natural and cultural resources in the saddle area are currently available at PTA, hunters stations, and the Onizuka Center. There are no plans for the creation, control, or distribution of additional printed materials.</p> <p>The FHWA has agreed to provide informational signage in proximity to historical markers and other planned road signs, pullouts, or parking areas, explaining the diversity and importance of the native habitats found within the saddle area, the importance of not introducing alien species into the environment, and fire dangers and effects.</p>
111	<p><i>Existing conditions on Kaumana Drive between milepost 2 and 6 are already dangerous and overloaded. With improvements to Saddle Road and anticipated increases in traffic levels, use of this section of Kaumana Drive as access to Saddle Road will be disastrous. The proposed Puinako cut off or improvements to Kaumana Drive between milepost 2 and 6 may greatly improve the success of this project and the safety of everyone.</i></p> <p>Refer to response to Comment 258.</p>
112	<p><i>Commenter supports selection of W-2 as the most efficient access to those working in the Kohala Coast Resorts.</i></p> <p>Comment noted.</p>
113	<p><i>Commenter supports selection of Segment PTA-1 within Section II.</i></p> <p>Comment noted.</p>
114	<p><i>Mitigation for loss of Palila Critical Habitat appears to offer far-reaching benefits.</i></p> <p>Comment noted.</p>

**TABLE 4.1.1**  
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115	<p><i>Segment W-2 would cross the Hawai'i Electric Light Company, Inc. (HELCO) existing Kaumana to Keamuku transmission lines No. 1 and No. 2 and portions of the transmission line may need to be relocated.</i></p> <p>Coordination with HELCO will be necessary during final design and construction of the recommended W-3 and E-3 alignments in order to relocate the transmission lines referenced. HELCO has been consulted regarding the potential line relocations.</p>
116	<p><i>Segment W-3 would cross the HELCO existing Kaumana to Keamuku transmission line No. 2 and portions of the transmission line may need to be relocated.</i></p> <p>Refer to response to Comment 115.</p>
117	<p><i>Segment EX-4A through Kaumana might require HELCO transmission line pole relocations.</i></p> <p>Refer to response to Comment 115.</p>
118	<p><i>Saddle Road needs to be improved, smoothed, widened, and straightened with all the safety features considered, regardless of cost. Many people exceed the speed limits which contributes to accidents. If project is not done properly, road could be even more dangerous.</i></p> <p>Comment noted.</p>
119	<p><i>Businesses want to invest in our community but, without improved infrastructure and a better business climate, future job opportunities for our children are bleak. The construction industry is struggling. The build-out of this project, together with the increased cross-island traffic, will allow businesses to expand their market base and become more secure and viable.</i></p> <p>Comment noted.</p>
120	<p><i>Commenter supports the balancing of preservation measures (e.g. biological, archaeological) with the needs of humans.</i></p> <p>Comment noted.</p>
121	<p><i>Commenter states that Saddle Road is currently unsafe.</i></p> <p>Comment noted.</p>

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122	<p><i>Commenter supports selection of Segment W-3 within Section I.</i></p> <p>Comment noted.</p>
123	<p><i>Will the new Saddle Road alignment be built on Palila Critical Habitat?</i></p> <p>Within Section II of the project, Segment PTA-1 is within Palila Critical Habitat and was selected as the Recommended Alternative. Critical Habitat will be affected and appropriate mitigation measures have been developed in accordance with the Endangered Species Act (ref: FEIS - Part III, BO).</p>
124	<p><i>Weather will always be a factor with regard to the safety of Saddle Road: danger of high wind and fog.</i></p> <p>Comment noted.</p>
125	<p><i>Biological resources discussions in the DEIS should reference game birds and game mammals, most of which have been here for hundreds of years. These game animals (some of them gifts to the Monarchy) have become an integral part of the biota - witness Mauna Kea. Commenter believes that any and all impact to this resource be adequately addressed in agreement with the hunting and recreational bird and animal watcher communities.</i></p> <p>All gamebirds and mammals found within the saddle area are referenced in the ornithological and mammalian study (RANA 1997, Tech. App. Vol. II). Hunting resources are presented in the FEIS, 3.3.4 Outdoor Recreation Resources and Hunting. No impacts to gamebirds are expected to occur as a result of the construction of this roadway. To clarify a point raised by the commenter, the majority of gamebirds in Hawai'i are relatively new introductions most after the second World War, and many circa 1960.</p>
126	<p><i>DEIS should note the beneficial results that accrue to those who utilize the area for hunting, bird watching, game watching, bird dog training, and for relaxing.</i></p> <p>The FEIS contains an expanded discussion of recreational activities that occur in the Saddle, including birding, hiking, nature study, and hunting (ref: Terry 1998, FEIS - Part III). It is generally assumed that benefits (e.g., stress reduction, exercise, social contact) accrue to those who practice recreation.</p>

**TABLE 4.1.1**  
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127	<p><i>The hunting area that would be impacted by PTA-1 and PTA-3 (Trail 1) is probably the only area available to the disabled, elderly, or those who are physically limited due to ill health or injury who like to hunt.</i></p> <p>Refer to response to Comment 33.</p>
128	<p><i>Commenter believes mitigation for loss of hunting lands is necessary and appropriate.</i></p> <p>A substantial area - about 1,864 ha at Pu'u Mali - of additional hunting land will be supplied by selection of the Recommended Alternative. FHWA believes that this would adequately mitigate for the minor loss of hunting area that would occur with selection of this route.</p>
129	<p><i>Commenter opposes the selection of W-3 because it would have an impact on the Pu'uanahulu Game Management Area, which is the largest game mammal bowhunting area on the west side of the Island. With the erosion of feral mammal hunting areas, greater strain is put on remaining areas. Poachers will use W-3 as an easier access route to the Pu'uanahulu Game Management Area, and result in a significant impact on recreational opportunities for law abiding hunters.</i></p> <p>Except near the junction with Mamalahoa Highway (where there is already access to the Pu'uanahulu Hunting Area) there will be a buffer of at least one mile between the W-3 segment and the hunting area. The buffer is grazing land under the control of Parker Ranch. Parker Ranch has said that they will maintain fences and patrol the area as part of their range management, for which poaching and trespassing is also a concern. Although it is always possible that determined poachers could be successful, the risk is no greater than for any other hunting area near or adjacent to roadways.</p>
130	<p><i>Selection of PTA-1 or PTA-3 would have an adverse noise effect on Mauna Kea State Park.</i></p> <p>Noise modeling was undertaken as part of the EIS process. Future noise levels were modeled at sensitive receptors within Mauna Kea State Park for the proposed alternatives based on current and future projected traffic levels. The results indicate that noise levels will rise with the increase in traffic over the next 20 years, however, Federal Noise Abatement Criteria will not be exceeded, and no substantial increase in noise would be expected with the selection of PTA-1 as the recommended alternative (FEIS, 3.8 Noise).</p>



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131	<p><i>No endemic species are resident on the EX-2 alignment.</i></p> <p>During the course of the faunal surveys for this project, the following Hawaiian endemic bat and bird species were detected along the EX-2 alignment: Hawaiian hoary bat, Hawai'i 'Amakihi, I'iwi, 'Apapane (RANA 1997, Tech. App. Vol. III). In addition, the endemic sub-species of the Short-eared Owl, the Pueo is also known to be a resident of the area.</p>
132	<p><i>Ka'ohē lease will be lost to hunting with Palila mitigation.</i></p> <p>Comment is not correct. Ka'ohē lease lands will remain open for hunting as managed by DLNR under current policies as long as they are consistent with the Palila Mitigation MOU stipulations (ref: FEIS - Part III, MOU).</p>
133	<p><i>USFWS and USGS/BRD have stated that Palila need an elevational gradient where Mamane flowers/seed pods will be available to the birds throughout the year. With that premise, Kipuka 'Alala, a relatively flat area, does not meet this criteria. Palila released in this area will be subjected to a "feast or famine" scenario where the birds will be forced to seek other areas once the food has dwindled. This area is not large enough to sustain Palila through the year, nor is it adjacent to a large mamane forest. This area should be deleted from the plan. Public sees this land acquisition as a land grab.</i></p> <p>Comment noted. Refer to USFWS letter to Moore, dated October 1996 (ref: FEIS - Part I, 3.18, and Part II, 1.4.3).</p>
134	<p><i>Kipuka 'Alala should be opened to public hunting to reduce the number of feral animals in the area. Historically, access has been restricted and only compounds the problems with feral animals impacting the native vegetation. Opening the area to public hunting is a win-win situation for the Army, the hunters, and the plants.</i></p> <p>Comment is noted and the issue has been addressed in the FEIS - Part I, 3.3.4 and Terry 1998, Part III). Under the Sikes Act as amended, the Army can limit access to any area under their control if allowing access will constitute a threat to the general public or interfere with the primary mission of the facility.</p>

**TABLE 4.1.1**  
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135	<p><i>Ka'ohē lease lands are very important to youth hunters. It is a relatively open area that makes it very safe for young hunters learning how to negotiate obstacles and other hunters in the field. These conditions could not be maintained without the presence of cattle. Game bird densities in this area range from good to excellent from year-to-year depending on annual rainfall. In years where rainfall is abundant, cattle need not be grazed at these higher elevations which leaves this pasture with more cover. Mowing cannot replace grazing as game birds thrive on available dung beetles which are dependent on cow dung. Mowing is also very labor intensive and costly. Commenter recommends fenced corridors to afford māmane trees protection from grazing, yet cattle would still be allowed in portions of the area. Once trees are large enough, allow cattle grazing within the enclosed area and rotate the fenced corridors to promote reforestation in other areas. This operation would save time and money spent on mowing, but would require close coordination with the rancher. It would also reduce the fire load.</i></p> <p>Refer to response to Comment 182. Research into the food habits of many of the gamebirds hunted in Hawai'i have not supported the commenter's assertion that they are dependant on dung beetles; most gamebirds are predominately granivorous (The Game Bird in Hawai'i, Schwartz &amp; Schwartz 1949).</p> <p>The guiding strategy at the Ka'ohē Lease lands is the concept of adaptive management. Trials of various fire and fuel load reduction management options will be explored as part of this concept. This may include grazing.</p>
136	<p><i>Bird hunters will appreciate the net increase in available hunting acreage with the acquisition of Pu'u Mali State leases as part of Palila mitigation package for PTA-1 and PTA-2. The three parcels listed contain fair to good amounts of game birds. Rocky areas with dense stands of pukiawe (<i>Styphelia</i> sp.) contain good densities of Erckel francolins (<i>Francolinus erckelii</i>). The pasture areas have marginal numbers of pheasants (<i>Phasianus</i> sp.) and Japanese quail (<i>Coturnix</i> sp.) being the target areas for māmane reforestation, commenter would suggest a similar grazing scheme as outlined in the Ka'ohē Lease discussion of Comment 135.</i></p> <p>Comment noted.</p>

**TABLE 4.1.1**  
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137	<p><i>Commenter would like to see work focus on lands already set aside for Palila. Almost the entire Mauna Kea mountain has been designated critical habitat for Palila (over 80,000 acres of habitat set aside). Commenter believes that the Palila critical habitat lines were not drawn very carefully from the onset and marginal areas were included. One such marginal area is in Section II where PTA-1 and 3 propose to go through. Commenter believes that this area is being used as an Endangered Species Act bargaining chip and is being traded to get something for nothing. Perhaps the critical habitat boundary should be revisited.</i></p> <p>It is quite possible that the original delineation of Palila Critical Habitat was less thorough than it should have been, and that some of the areas delineated may be of marginal quality. Scientists working on Palila would disagree, however, with the assertion that the lands within Training Areas 1 through 4 are marginal Palila habitat. This area was identified by biologists at BRD/USGS as one of the top two places in which Palila translocation should be considered. Changing the currently delineated boundaries of the Palila Critical Habitat is beyond the scope of this project and was not considered a reasonable alternative.</p>
138	<p><i>With Palila mitigation package should come accountability, with measurable goals and objectives established prior to the release of any monies for mitigation.</i></p> <p>The Council on Environmental Quality (CEQ) Regulations require that mitigation established in the EIS be implemented by the lead agency or other appropriate consenting agency. The CEQ Regulations also require that the lead agency "condition funding of actions on mitigation." These requirements will be met by the FHWA and other required agencies prior to the commencement of construction on the proposed project through the execution of appropriate interagency agreements delineating agency roles, funding, and implementation responsibilities. Participation, funding, and implementation requirements contained in the agreements will be guided by mitigation program goals stipulated in the MOU (ref: FEIS - Part III, MOU). Refer to response to Comment 207.</p>

**TABLE 4.1.1**  
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139	<p><i>Commenter notes that the proposed improvements will provide a major service to military operations at PTA. Relocation of the road along the PTA-1 alignment will remove civilian traffic from the active training area. Safety issues are associated with live-fire exercises in public use areas and the mixing of military and civilian traffic within the training area. Commenter believes that the long-term stability of PTA as a training center for Pacific-based armed forces is essential, both to our national security and to the economic contribution military operations make to this state. Alternative Route PTA-1 will help resolve public safety issues and will address significant impediments to the long-term stability of the military's contribution to this community. Commenter supports PTA-1.</i></p> <p>Comment noted.</p>
140	<p><i>With regard to visitor use, the linkage between the resort communities on the Kona/Kohala coast and the Hawai'i Volcanos is well established. Saddle Road improvements will enhance this linkage and provide visitors a unique and spectacular touring option.</i></p> <p>Comment noted.</p>
141	<p><i>The island has an increasing need to commute and commerce from one side to the other. The cost of adding addition lanes to the Hamakua Coast route is prohibitive. Commenter believes there is strong economic justification for Saddle Road improvements.</i></p> <p>Comment noted.</p>
142	<p><i>Saddle Road improvements will facilitate construction, maintenance, and operations of the astronomic and atmospheric research being undertaken on Mauna Kea and Mauna Loa.</i></p> <p>Comment noted.</p>

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143	<p><i>The selection of W-3 would require the design and construction of an additional roadway to connect Mamalahoa highway with the Queen Ka'ahumanu Highway, an additional public expense for duplicate infrastructure.</i></p> <p>Future traffic projections indicate a need for additional roadway capacity from the Mamalahoa Highway to the Queen Ka'ahumanu Highway in South Kohala. Scoping has begun on a new roadway location to connect the Mamalahoa Highway to the Queen Ka'ahumanu Highway south of Waikoloa Village. A new alignment in this vicinity is included in the Long Range Highway Plan for the Island of Hawai'i.</p>
144	<p><i>The majority of federal troop and equipment movements between Kawaihae Harbor and the PTA utilize the Queen Ka'ahumanu Highway (SR19) and Waikoloa Road. Connection of the Saddle Road at the Waikoloa Road junction with Mamalahoa Highway will provide the most convenient and direct routing for both the military and the general public. W-3 would not provide direct access to Kawaihae Harbor.</i></p> <p>HDOT is examining the possible construction of a new roadway from the Mamalahoa Highway to the Queen Ka'ahumanu. This new roadway, if constructed, may connect with the recommended alignment (Segment W-3) south of Waikoloa Road. In any event, the military would use this route for transportation of troops and munitions, thus avoiding the populated area of Waikoloa Village.</p>
145	<p><i>The EIS needs to address the impact of the increased traffic on Waikoloa Road and assess the improvements which will be required to handle the anticipated traffic.</i></p> <p>Increased traffic on Waikoloa Road is expected to be minimal. Refer to response to Comment 143 and Supplement to Social Impact Assessment (ref: Terry 1998, FEIS - Part III).</p>
146	<p><i>The project team has knowingly conspired with the U.S. Fish and Wildlife Service, U.S. Geological Survey/Biological Resources Division, and the Army Corps of Engineers to give false information and statements, excluded participation, suppressed scientific information, and exclude the hunting community's involvement and input.</i></p> <p>Considerable effort was made throughout the EIS process to solicit input and provide information specifically to hunters and hunter groups. The FEIS, 3.3.4 Outdoor Recreation Resources and Hunting documents this process. In addition, hunter interests were well represented at the public hearings held for the project.</p>

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147	<p><i>The hunting community was castrated from participating in the EIS process.</i></p> <p>Refer to response to Comments 146 and 148.</p>
148	<p><i>The general public was not openly and completely informed about all of the project aspects and mitigation, all of the options for the road to be built with the Army's objectives along with the least amount of disruption, confusion, and mitigation dollars were not analyzed.</i></p> <p>Refer to FEIS - Part II, Section 1.0, for the history of public involvement and scoping. Refer to FEIS - Part II, 1.3 for a list of agencies, organizations, and individuals to whom project newsletters and other project notifications were sent over the course of project development. The DEIS, 8.0, included a list of agencies, organizations, libraries, elected officials, and individuals who received a copy of the DEIS. Notice of Availability of the DEIS was published in the Federal Register on Friday, November 7, 1997 and in the Office of Environmental Quality Control bulletin on November 8, 1997. Public Hearings were held in west and east Hawai'i, on a weekday night and a weekend day, on December 11 and 13, respectively. Comments on the DEIS were received through January of 1998, thus affording almost 3 times the required public review and comment period. Refer to the FEIS - Part I, 8.0, for a list of agencies, organizations, libraries, elected officials, and individuals who received a copy of the FEIS.</p>
149	<p><i>The public meetings included only a select group of individuals (Enviro's, State DLNR, Hunters, Bill Moore and Ron Terry). The meetings were called by Brooks Harper and Elizabeth Sharpe to try to get something for nothing and to add cost to the Saddle Road Realignment Project. There was no sincere intent or attempt to be fair or play fair with the Hunting community. Attendees motioned and voted to ban the press from attending and reporting about the discussions at these public meetings.</i></p> <p>Refer to response to Comment 146.</p>

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150	<p><i>Why wasn't the suggestion to stay out of the Critical Habitat researched and considered as a viable option? Why not place the road as far north as possible yet outside of Critical Habitat? Without the direct impact, the USFWS and the USGS/BRD would not be able to extort the Army and the project.</i></p> <p>It is assumed that the required level of mitigation would be lowered if the new road alignment did not directly take Palila Critical Habitat, however, because of fire hazard, risk of spread of alien species, etc., mitigation for impacts to the Endangered Palila will be required to some extent with any of the alternatives analyzed in the EIS.</p>
151	<p><i>Why wasn't it shown that it would be more expensive to repave the existing roadway than it would be to build a new one?</i></p> <p>Repaving the existing road would not correct the substandard alignment and would cause more accidents by giving motorists a false sense of security. This alternative would not meet the purpose and need for the proposed project, and therefore, was not considered a reasonable alternative.</p>
152	<p><i>Why weren't the combined effects of other Federal and State ongoing projects and programs in the PTA, Mauna Kea, and Ka'ohe Game Management Areas described and analyzed in the EIS for their combined affects?</i></p> <p>The combined effects of other Federal and State ongoing projects and programs is addressed in the FEIS - Part I, 6.0. The FEIS - Part - I, 6.0, has been expanded.</p>
153	<p><i>The EIS does not include a fair and accurate analysis of the Game Mammal hunting that has and is currently occurring in the PTA area where the road is proposed?</i></p> <p>Analysis of game mammal hunting occurring in the PTA area along the recommended alignment for Saddle Road is presented in the FEIS, 3.3.4 Outdoor Recreation Resources and Hunting. Specific concern of commenter is unclear.</p>

**TABLE 4.1.1  
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154	<p><i>The DEIS and Biological Assessment (BA) do not address the Game Mammal and Game Bird daily movement patterns and feeding habits?</i></p> <p>Known patterns of movement of game mammals and birds are discussed in the FEIS - Part I, 3.3.4..</p> <p>As stipulated in the Endangered Species Act, the Biological Assessment shall evaluate the potential effects of the action on listed and proposed species and designated and proposed critical habitat and determine whether any such species or habitat are likely to be adversely affected by the action and is used in determining whether formal consultation or conference is necessary. The Endangered Species Act does not protect game resources.</p>
155	<p><i>The DEIS does not include a historical hunting summary for the PTA. Hunting is and has been part of the PTA from the beginning, as stated in the leases.</i></p> <p>The EIS is not intended to provide a history of various types of land use in the study area. According to officials from DOFAW and PTA, the military is in full compliance with the provisions of the lease related to hunting.</p>
156	<p><i>The DEIS states that there are no official records of hunting in the Kipuka 'Alala and Bobcat areas of the PTA. These areas have always been designated as hunting areas, and have been used by military and civilian personnel for hunting. If the PTA command doesn't have any records of them they are in violation of the State lease.</i></p> <p>None of the current state hunting maps, PTA hunting maps, and other sources available indicate that Kipuka 'Alala has been an official hunting area during the recent past. The FEIS contains further discussion of hunting records in the pre-1980 time period. After extensive research and consultation with the DLNR, the USFWS, and the US Army, no evidence was found indicating that this area was ever open to hunting. It must be noted, however, that few detailed records exist for the period before 1950.</p>
157	<p><i>Why weren't the users (military and civilian) of units 1, 2, 3, 4, 10, and 11 asked for their input from the very beginning?</i></p> <p>The USAG-HI is a cooperating agency for this EIS process, and as such, was consulted throughout the process. With regard to hunter input, refer to response to Comment 146.</p>



**TABLE 4.1.1**  
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158	<p><i>Why weren't the hunters for the east and west sides of the Island consulted for roadway input regarding safety, road conditions, hazards, etc?</i></p> <p>Input on safety, road conditions, hazards, and all other concerns, was welcomed from any interested individual or group throughout the public involvement process. Refer to response to Comment 148.</p>
159	<p><i>Why isn't the roadway designed to handle 14,000 vehicles?</i></p> <p>The roadway will be designed to handle 14,000 vehicles per day. It is anticipated that the LOS for the recommended alignments W-3, PTA-1, and most of the length of EX-3, will operate at LOS B by the design year 2014. Approximately the lower 8.1 km of EX-3 and the E-3 alignment would operate at LOS C much of the time, with short segments at LOS D during peak hours in the design year. This lower LOS on part of recommended alignments EX-3 and E-3 is primarily a result of a more curvilinear alignment with reduced passing opportunities on steeper grades. The curvilinear alignment and reduced passing opportunities are the result of efforts to minimize impacts on sensitive environmental resources in this area. LOS C is acceptable for a design standard when there are overriding factors such as cost and impacts.</p>
160	<p><i>Why isn't the road designed for slow moving military convoys and civilian commercial and public traffic? Where are the slow moving vehicle lanes throughout the Saddle Road realignment?</i></p> <p>Refer to response to Comment 293.</p>
161	<p><i>Why aren't the safety concerns in Section III being taken care of as a part of this project?</i></p> <p>The Section III recommended alternative will be designed to modern two-lane rural arterial standards matching those of the other sections.</p>
162	<p><i>Why aren't stop lights, reflectors, warning lights, turn signals, guard rails, etc. included in project? When will they be included?</i></p> <p>Standard traffic control devices, signing, and markings, as well as safety appurtenances (where warranted) will be designed into the project.</p>

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163	<p><i>The Palila mitigation is not outlined in detail with its steps, bench marks, goals and objectives, cost, and outcome? Mitigation needs checks and balances.</i></p> <p>The Palila mitigation and associated costs are outlined in the FEIS (ref: 3.18.3), the BO, and MOU (ref: FEIS - Part III, BO, MOU). The BO details the specific checks and balances, and the MOU parties responsible for implementing and overseeing the mitigation.</p>
164	<p><i>Why isn't the Army's Palila mitigation held to only the PTA? Or does this mean that any mitigation the State is going through may apply to the PTA?</i></p> <p>Commenter's question is unclear.</p>
165	<p><i>Why isn't the scientific opinion backed up with factual data that supports their opinion that PTA-1 would make all of the above Palila Critical Habitat uninhabitable/useless to the Palila species?</i></p> <p>It is <u>not</u> the opinion of the scientific community that the proposed modification of Palila Critical Habitat for the Saddle Road improvements will render the remainder of the delineated habitat uninhabitable or useless. Under the terms of the Endangered Species Act of 1973 as amended, however, any federal action that may have an impact on any listed species or federally delineated Critical Habitat must consult with the USFWS under Section 7 of the Act to ensure that appropriate mitigation is in place so that the proposed action does not further endanger listed species (ref: FEIS - Part I, 3.18.3).</p>
166	<p><i>Why wasn't the Federal Endangered Species Act used to protect an existing population of Palila and realign Saddle Road?</i></p> <p>For the proposed project, the FHWA undertook consultation with the USFWS under the requirements of Section 7 of the Act for two years. The mitigation measures proposed to offset impacts to Palila Critical Habitat, Palila, and other trust resources were developed with the assistance and expertise of the biologists at both the USFWS and BRD/USGS. Under the Act, any federal action that may have an impact on any listed species or federally delineated Critical Habitat must consult with the USFWS to develop appropriate mitigation to ensure that the proposed action does not further endanger any listed species (ref: FEIS - Part III, BO).</p>

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167	<p><i>Do the actions of USFWS, USGS/BRD and the State DLNR to create populations of Palila mean that the Critical Habitat, as defined by the Court Order, has reached its natural carrying capacity?</i></p> <p>The referenced actions do not indicate that the federally-delineated Palila Critical Habitat has reached its natural carrying capacity. These actions are being proposed in response to the terms of the Endangered Species Act and the conditions imposed for modifying federally-designated critical habitat (ref: FEIS - Part III, BO).</p>
168	<p><i>The DEIS does not address the negative, long-term affects of the realignment relating to the environment of and surrounding the PTA?</i></p> <p>The EIS addresses long-term impacts to the natural and biological resources on and around the PTA within Section II (ref: FEIS - Part I, 3.0). Specific intent of comment unclear.</p>
169	<p><i>If Military Access Funds are being used for Saddle Road, why isn't the whole road to the Port (Kawaihae) and airport (General Lyman) being upgraded?</i></p> <p>Refer to response to Comment 308.</p>
170	<p><i>Who will be responsible for maintaining the road once it has been completed?</i></p> <p>Through agreement with the FHWA, the HDOT Highways Division will be responsible for maintaining the section of the improved road within the PTA (Section II) once it has been completed. Planning, design, and construction will be administered by the FHWA utilizing DOD funding. HDOT has also agreed to be responsible for the design, construction, and maintenance of the improved road within the remaining sections (Section I - Segment W-3, Section III - Segment EX-3, and Section IV - Segment E-3).</p>
171	<p><i>Process did not look at alternative routes that would not impact Critical Habitat. The road could parallel the Palila Critical Habitat.</i></p> <p>PTA-1 and PTA-3 would directly take Palila Critical habitat. On the other hand, Segment EX-2 follows the existing Saddle Road alignment and avoids direct impact to Palila Critical Habitat.</p>

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172	<p><i>Why wasn't a trade for Trail 1 considered for which the State would trade more range adjacent to the PTA, on Mauna Loa for military maneuvers?</i></p> <p>The Saddle Road Project involves the realignment/reconstruction of an existing public roadway through an existing military training area. The scope of the project therefore is limited to determining the alignment that best meets the purpose and need.</p>
173	<p><i>Why doesn't the roadway fencing through the PTA allow for emergency pullouts for accidents, breakdowns, and flat tires?</i></p> <p>As shown in Figure 2.1.1 in the FEIS, a 2.4-m wide paved shoulder will be provided for emergency use. This shoulder will be located immediately adjacent to the travel lanes; proposed fencing would be situated outside of these shoulders. The fencing within PTA is a fire-prevention appurtenance intended to discourage motorists from wandering from the roadway at indiscriminate locations in their vehicles or on foot.</p>
174	<p><i>Why hasn't the astronomy community been consulted regarding the future impact of 14,000 vehicles per day on their night research?</i></p> <p>The University of Hawai'i's Institute for Astronomy (IFA) has been involved in the planning of the project from its inception. According to correspondence and discussions with the IFA, the impact of automobile lights on the astronomical viewing will be negligible. Much of the traffic will be in the daytime. As designed, the roadway will not direct headlights toward the summit area and street lights are not proposed along the roadway. Nighttime traffic will not impact astronomical observations on Mauna Kea.</p>
175	<p><i>Why weren't the direct, current, and future negative impacts of the realignment on hunting in the PTA shown in DEIS?</i></p> <p>FEIS Section 3.3.4.2 addresses the direct, current, and future impacts to hunting that would result from the project. This information is summarized from Tech. App. Vol. V, Appendix A.</p>
176	<p><i>DEIS doesn't disclose the source of funding for all of the realignment and mitigation costs.</i></p> <p>Refer to response to Comment 308.</p>

**TABLE 4.1.1**  
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177	<p><i>Public review period should be longer. Too few copies were available for the public to review, and copies could not be borrowed. These conditions make it extremely hard for the general working public to review the eight volumes and accurately respond to the DEIS.</i></p> <p>Copies of the document were available at numerous locations. Also refer to response to Comments 15 and 148.</p>
178	<p><i>Why wasn't the importance of hunting and its game animals and lands treated with the honor that it deserves? Hunting is one of the cornerstones in our past and present day American society.</i></p> <p>The EIS discusses the importance of hunting to Hawai'i residents (FEIS, 3.3.4 Outdoor Recreation Resources and Hunting).</p>
179	<p><i>Commenter opposed to Saddle Road improvements. States support for the No Action Alternative. Commenter does not want to see the area degenerate.</i></p> <p>Comment noted.</p>
180	<p><i>Project bulletin received by Waikoloa residents one day before hearing, presumably in an effort to discourage the public from attending the meeting.</i></p> <p>The project bulletin referenced by commenter was intended to provide information on the project. It was not intended to serve as a public notice of the hearing dates. Notification of hearing dates appeared in the West Hawai'i Today, Hilo Tribune-Herald, and the Honolulu Star Bulletin. The dates of publication of these notices were Tuesday, November 11, and Wednesday, December 3, 1997. The hearings were held on Thursday, December 11 and Saturday, December 13, 1997. Also refer to response to Comment 15.</p>

**TABLE 4.1.1**  
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181	<p><i>Last paragraph, page 26, of the Palila Mitigation Plan indicates that discussions with lease holders is incomplete. To date, discussions have not produced a satisfactory compensation plan for K.K. Ranch. Reduction in lease and compensation for depreciated value of permanent fixtures have been brought up by DLNR. Compensation at that level alone does not address loss of the breeding cow herd that would be displaced and loss of the value of that herd's calf crops over the duration of the remainder of the lease. Without adequate compensation for the displaced cow herd and the herds calf crops over the duration of the remainder of the lease, there would be no way for K.K. Ranch to remain solvent.</i></p> <p>As indicated in the Biological Assessment, Page 26 (RANA 1997, Tech. App. Vol. III), consultation is ongoing with those ranchers whose State pasture leases or portions thereof would be affected by the Saddle Road project. The scope and range of compensation has not been determined. The full impact of the withdrawal of these leases (or portions thereof) will be considered in these discussions. Since federal monies are involved, compensation must be guided by the Uniform Real Property Acquisition and Relocation Assistance Act.</p>
182	<p><i>No enclosure studies have been conducted for cattle and mamane. Known studies have been conducted for goats and sheep. Results of goat and sheep studies should not be used to make determinations as to the affect of controlled rotational grazing of cattle and its affect on mamane. It has been the experience of the commenter that the rotation of the mauka cow herd out of a grazed paddock prior to complete depletion of grass results in no damage to mature and young mamane trees, including young shoots and rhizomes growing near the base of existing trees. Commenter recommends that existing paddocks be retained in place and controlled grazing be offered once annually for the purpose of fire control to those ranchers who have had their lands withdrawn. Cattle should be placed in the paddocks at peak grass production times (April through July) and removed in advance of grass depletion.</i></p> <p>No extrapolation was made from previous grazing and exclosure experiments on different species. In light of the lack of documented scientifically credible trials to empirically test the assertion that cattle and mamane are not mutually exclusionary – field trials will be conducted in the Pu'u Mali area to evaluate the effectiveness of utilizing cattle grazing as a fire fuel load management tool in conjunction with the restoration of mamane forest. If it is proven that within the specific habitat being managed that cattle are effective in fuel management and do not compromise the primary goal of restoring the mamane forest, then their usage will be managed accordingly by the resource managers implementing the mitigation plan.</p>

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183	<p><i>Is there going to be a military buildup at the PTA?</i></p> <p>Refer to response to Comment 18 (FEIS, 3.1.1.1.2 Military).</p>
184	<p><i>Commenter does not support the realignment of Saddle Road within Palila Critical Habitat because of concerns for the viability of this species.</i></p> <p>Comment noted. Biologists from the USFWS and the BRD/USGS believe that the construction of either PTA-1 or PTA-3 will not result in an increased threat to Palila with the implementation of proposed mitigation measures (ref: FEIS - Part III, BO).</p>
185	<p><i>We must protect historic archaeologic sites. The proposed road would surely destroy these sites.</i></p> <p>With the selection of the Recommended Alternative, only three archaeological sites will be completely destroyed: a 20th century surveyors' marker that is no longer in use, a very small platform built on a 19th century lava flow that has no other cultural material with it, and the cement slab foundation of a 20th century house. The information associated with these sites has already been obtained through appropriate scientific study. The remaining sites are protected through the mitigative actions determined in consultation with Native Hawaiians, other local persons associated with those sites, archaeologists, and state and federal reviewing agencies. Refer to response to Comment 27.</p>
186	<p><i>It is imperative that we respect Native Hawaiian sacred areas such as the mamane forest and kipuka.</i></p> <p>The FHWA has a profound respect for Native Hawaiian sacred areas, and for the mamane forest and kipuka. Based on extensive consultation with knowledgeable and respected Native Hawaiian leaders and the DLNR Historic Preservation Division, it is clear that the mamane forest and kipuka should not be confused with sacred areas. Sacred areas that have been identified through the extensive investigations are being treated with utmost respect and care, and will not be adversely affected by this project. The mamane forest and kipuka are also being treated with respect and care, and impacts to these resources will be carried out with the minimal impact possible.</p>
187	<p><i>Commenter does not support the expenditure of funds for this project.</i></p> <p>Comment noted.</p>

**TABLE 4.1.1**  
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188	<p><i>Make the present road safer rather than spend millions to realign.</i></p> <p>Comment noted.</p>
189	<p><i>What percentage of total project cost is for mitigation purposes? What is the breakdown of these mitigation costs by type?</i></p> <p>Approximately 10 percent of the total project cost is for mitigation. Refer to FEIS, 3.18 Threatened and Endangered Species and Palila Mitigation MOU (ref: FEIS - Part III, revised Table A).</p>
190	<p><i>Millions have been spent for fencing, eradication, biological surveys, research and environmental assessments on Mauna Kea. It has been over twenty years since the process of eradication has taken place and the number of Palila has not increased nor has their range expanded. Who is being held accountable for all the millions that will be spent with no visible results.</i></p> <p>With regard to the Saddle Road project, the Palila Mitigation MOU outlines mitigation actions, the specific agencies responsible for their implementation, and proposed funding. Follow-up MOA must be finalized prior to construction, which will hold specific agencies responsible for various mitigation actions.</p>
191	<p><i>The construction of paved fire breaks, curbs, and a fence to minimize threat of wildfires within the project area would not be visually pleasing, and would not encourage visitor use.</i></p> <p>Comment noted. Refer to response to Comment 233.</p>



**TABLE 4.1.1**  
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192	<p><i>DEIS does not mention USFWS plans to fence the entire northeastern section of PTA and eliminate feral animals from the enclosed area, including Kipuka 'Alala. When this takes place there will be tremendous negative impacts on the feral sheep, goat, and pig populations in the adjoining Game Management Areas (Pu'uanahulu).</i></p> <p>While some plans for ungulate control are being discussed as part of separate, unrelated actions, no firm plans have been developed (FEIS, 3.3.4 Outdoor Recreation and Hunting). It would stand to reason that the action of driving animals out of parts of the PTA into the Game Management Areas will improve the hunting in those areas. One of the main reasons that game animals are located within parts of PTA is that many of these areas are closed to hunters.</p> <p>While most of these ungulate control plans are not germane to this EIS, the referenced fencing of Kipuka 'Alala will result from implementation of the proposed improvements to Saddle Road. This area has not historically been open to hunters; impacts to hunting from this action are expected to range from neutral to beneficial.</p>
193	<p><i>Commenter supports selection of Segment EX-1 for the following reasons: improved travel to the Waimea, Kohala and Kawaihae areas, minimized disruption of the environment and any endangered plant species that exist in W-2 and W-3, minimized impact on Waiki'i Ranch.</i></p> <p>Travel time to Waimea is increased by less than 2 minutes along the Recommended Alternative, W-3. Substantial impacts to Waiki'i Ranch were noted (ref: FEIS - Part I, 2.5). No threatened or endangered plant species were detected along either the W-2 or W-3 alignments. Endangered species were detected along EX-1, close to the existing roadway.</p>
194	<p><i>Lower speed limits and more enforcement of limits will be needed if roadway is improved.</i></p> <p>The proposed project design speed is 80 km per hour with 100 km per hour in locations where warranted and feasible. The roadway design features will permit safe operation at these speeds with the traffic volumes anticipated. However, with a higher volume of traffic, it is reasonable to assume that there will be more traffic violations and thus a need for increased enforcement.</p>

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195	<p><i>A mitigation plan for hunting impacts has been submitted to the project team, however, there is no mention of the mitigation plan in the project bulletin.</i></p> <p>The hunting mitigation plan referenced by commenter is addressed in the EIS Tech. App. Vol. V, Appendix A, Impacts to Hunting, and in the FEIS, 3.3.4 Outdoor Recreation Resources and Hunting. Because the net impact of the project on hunting resources was determined to be beneficial, the need for mitigation for hunting impacts is not justified. It is recognized that the beneficial impacts of the Palila mitigation mostly apply to bird hunters. The USAG-HI is planning some actions through its EMP that will benefit ungulate hunters. These actions include habitat enhancement and studies as well as improved access to existing hunting areas.</p>
196	<p><i>If W-2 or W-3 is selected, consideration should be given to the installation of intersection safety features, such as a traffic light or an over/under pass.</i></p> <p>With the selection of the Recommended Alternative W-3, a signalized, at-grade intersection will be provided in the final design at the Mamalahoa Highway and constructed as an integral part of the project.</p>
197	<p><i>Commenter supports Segment EX-2 within Section II if funding of PTA-1 or PTA-3 mitigation is a problem.</i></p> <p>Comment noted.</p>
198	<p><i>Commenter supports selection of Segment EX-4A within Section IV.</i></p> <p>Comment noted.</p>
199	<p><i>Commenter believes that proposed realignments in Sections I and II would be of the greatest detriment to an area already feeling the weight of use by the Military. The realignments will not save motorists any appreciable time, and merely add to further scarring of the area. Commenter supports widening of existing roadway alignment.</i></p> <p>Comment noted.</p>

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200	<p><i>During construction and realignment, install a large water pipe and huge underground electric service cables. With the development of these utilities, development would be possible for future growth. If Hilo side were to negotiate with HELCO to get electricity cheap during late night hours when no one is using it we could pump water up the hill all night and let gravity take it to new farmers on the Kona side with lots of land and no water.</i></p> <p>Installation of water and electric facilities within the roadway corridor is beyond the scope of this project. HELCO and the Department of Water Supply are aware of the proposed roadway improvements.</p>
201	<p><i>Could the shoulders be paved with high quality asphalt to allow for bicycle use? Commenter supports the construction of adequate shoulders.</i></p> <p>While Saddle Road will not be designed to accommodate bicycle, pedestrian, or equestrian use separately from the travelway and shoulders, the wide shoulders (2.4 m) and clear zone outside of the shoulders will afford safe operating conditions for cyclists and other non-motorists who choose to use the route. In addition, travel lane paving and cross-slope (2 percent) will remain the same across the road surface from centerline to edge-of-shoulder, i.e. there will be no drop off at the shoulders. Raised reflective pavement markers along centerline and edge striping will be installed where warranted to further increase the safety of motorists, cyclists, pedestrians, and equestrians.</p>
202	<p><i>Could inverted rumble strips be added between the car lane and the shoulder (as on Queen Ka'ahumanu Highway, north from Keahole Airport)?</i></p> <p>Parallel rumble strips outside of the travel lane and adjacent to the travelway edge striping may be added in the final design as safety considerations warrant. It should be noted that these strips can present a hazard to bicyclists using the roadway shoulder during turning movements.</p>
203	<p><i>Saddle Road should be improved to be a four-lane road.</i></p> <p>Sufficient ROW will be provided to accommodate future expansion to four lanes as conditions and traffic volume warrant.</p>

**TABLE 4.1.1**  
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204	<p><i>Commenter suggests that road be forked on west side, with one exit to Waimea and one to Kona, with eventually a south extension to Kau.</i></p> <p>Comment noted. With the proposed improvements to Saddle Road, two alternative segments were considered on the east end within Section I of the project corridor: Segments W-2 and W-3. With the selection of either of these realignment routes, the existing section of Saddle Road within this section would be maintained for traffic use, providing an alternative route and some degree of convenience referenced by commenter. Construction of two new alignments as suggested would be quite costly to construct and to maintain, and its need cannot be supported at this time based on projected traffic volumes.</p>
205	<p><i>Commenter states need for amenities on Saddle Road such as gas stations and public rest stops.</i></p> <p>Refer to response to Comment 315.</p>
206	<p><i>Commenter expresses general support for the project if a net gain of suitable Palila habitat can be guaranteed. Should PTA-1 or PTA-3 be selected, commenter strongly supports the overall mitigation measures as outlined in the DEIS, as well as the Palila mitigation plan in particular to offset the irreversible ecological impacts of road construction.</i></p> <p>Comment noted.</p>

**TABLE 4.1.1**  
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207	<p><i>Commenter concerned about financing structure for the Palila Mitigation Plan. The high cost places the mitigation plan at the risk of not being fully implemented. How will funding for full Palila Mitigation Plan be guaranteed if the project is constructed incrementally? Will mitigation funds be tied solely to each separate segment, with Palila restoration efforts to run only concurrently with the impacts from constructed segments? What is the tentative timetable for implementing the Palila Mitigation Plan? The MOA for the Palila Critical Habitat and the final Record of Decision is must have ironclad provisions to ensure that net gains of Palila Critical Habitat are in fact made.</i></p> <p>The mechanisms for funding, the structuring of the mitigation funds, and how and under what conditions these proposed funds will be released to implementing agencies and/or entities is outlined in the MOU signed by the participating agencies. The terms and conditions of implementing the mitigation are stipulated in this MOU. The first segment to be constructed on this project will be PTA-1, thus requiring that the Palila mitigation be initiated concurrently. All Palila mitigation will be tied to this segment. Specific interagency MOA will be executed between participating agencies prior to construction based on funding allocated for PTA-1 each year. Refer to response to Comment 138 (ref: FEIS - Part III, BO and MOU).</p>
208	<p><i>A fuller discussion is needed of the effects generated by the bisection of native forest and shrub land habitat. Edge effects from light, noise and the introduction of alien species will extend far further than the construction corridor. Additionally, roads are notorious avenues for the spread of ants and rodents give the presence of trash at parking areas, tail heads, scenic pullouts, and in the PTA area, discarded MREs. Long-term mitigation and education efforts beyond the construction period are needed to prevent the further degradation of any native ecosystems impacted by the road. Funding for such long-term efforts could be financed by requiring toll fees for use of certain sections or the entire length of the road once construction is completed.</i></p> <p>Refer to FEIS - Part I, 3.0 and 6.0, and Part III, BO. The volume of traffic predicted for the improved Saddle Road does not make a toll facility economically feasible. Consequently, this was not considered a reasonable alternative to be advanced for further study.</p>

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209	<p><i>Suitable scenic pullouts and parking should be made available as appropriate to made the considerable natural resources along the road readily accessible to the public. If appropriate areas for these uses (coupled with necessary mitigation measures) are not provided, road users will stop at inappropriate areas and only contribute to the degradation and not the conservation of the area's natural resources.</i></p> <p>Refer to response to Comment 108.</p>
210	<p><i>Commenter wishes for project to proceed as quickly as possible.</i></p> <p>Comment noted.</p>
211	<p><i>Commenter recommends that climbing lanes be integrated into project, especially in Section I and IV.</i></p> <p>Refer to response to Comment 293.</p>
212	<p><i>Paved shoulders and firebreaks could be used for climbing lanes with proper signage.</i></p> <p>Refer to response to Comment 293.</p>
213	<p><i>Commenter recommends the addition of frequently spaced emergency phones at suggested view turnouts and stopping areas.</i></p> <p>Emergency call boxes will be installed along Saddle Road through the length of Section II, milepost 42 to 28, spaced at approximately 2-km intervals. The call boxes are planned for Section II because of the fire hazard that exists within that section (FEIS - Part I, 3.9.3). There are no current plans to install emergency phones or call boxes along the remainder of the road.</p>
214	<p><i>Commenter recommends that the shoulder areas and fire break area be kept with a 2 percent cross grade to allow for truck climbing lanes and for recreational use by bikers and runners.</i></p> <p>Refer to response to Comment 201.</p>
215	<p><i>Commenter recommends minimizing the installation of roadside fencing.</i></p> <p>Comment noted.</p>

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216	<p><i>During construction and realignment applicant should plan for Energy/Utility Corridor. Since this is a major cross-island access, planned inclusion as an energy/utility corridor now will allow entities to reasonably plan cross-island links.</i></p> <p>Refer to response to Comment 200.</p>
217	<p><i>Commenter supports selection of Segment E-3 within Section IV.</i></p> <p>Comment noted.</p>
218	<p><i>Consider a land exchange to revert that area to the north of the controversial Palila habitat (PTA-1 and PTA-3) to a state game preserve managed by the state, then have the military obtain more area to match. Realign the highway to the edge of the forested limits. Area for acquisition can be from along the southwest side of the existing PTA (near milepost 42, Section I) into State leased lands.</i></p> <p>Comment noted.</p>
219	<p><i>What are the likely consequences to areas with rare, native, endangered species as a result of increased access and traffic?</i></p> <p>Refer to FEIS - Part I, 3.0.</p>
220	<p><i>Commenter disagrees with the assertion that the potential loss of endangered species, native plants, and animals can be weighed against travel time savings and economic benefits.</i></p> <p>Comment noted.</p>

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221	<p><i>Some hidden costs not identified in DEIS include increases in the amount of traffic on Saddle Road, which will result in a higher incidence of motor vehicle accidents and will lead to the need for greater police enforcement as well as emergency response. Roadway improvements will lead to the construction of more gas stations, more development, and certainly additional urbanization.</i></p> <p>The improvement to Saddle Road will result in a safer roadway by eliminating existing design deficiencies. This in turn should lower the accident rate. However, with an anticipated increase in traffic, the total number of accidents will likely increase but with lower severity and frequency. The costs of these accidents are considered in the FEIS, 3.4.4 Safety. These cost estimates include those related to police and emergency response.</p> <p>With respect to the potential for additional urbanization as a result of the roadway improvements, refer to response to Comment A176.</p>
222	<p><i>Copies of DEIS were difficult to obtain, making review difficult.</i></p> <p>Refer to response to Comments 15, 148 and 177.</p>
223	<p><i>Is it possible to provide an equestrian ROW area along with sidewalk and bikeway areas? Could they be separated somewhat, since traffic can spook horses.</i></p> <p>Refer to response to Comment 201.</p>
224	<p><i>Commenter opposed to the displacement of hunting areas.</i></p> <p>Comment noted.</p>



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225	<p><i>Road should be carefully aligned so that it does not negatively impact kipuka and lava flow ecosystems. Staging, stockpile, and storage areas needed for construction, as well as turnouts and parking areas, should be planned as part of this EIS. DEIS does not provide enough detail.</i></p> <p>The roadway will be carefully aligned to minimize impacts to kipuka and lava flow ecosystems. Staging, stockpiling, and storage areas will be carefully located during the final design phase of the project. With the use of detailed mapping available for final roadway design, staging, stockpiling, and storage areas will be sited in previously disturbed areas, such as relocated sections of the existing road. Operation of equipment and storage procedures within staging areas is strictly regulated by contract specifications. A Conservation District Use Permit is required to convert Conservation District land to ROW purposes. These permits require mitigation and avoidance measures in accordance with State law, which, in some instances, is more strict than Federal law. Commitments by FHWA and HDOT have been made to work closely with the DLNR and the USFWS to locate all pullouts and parking areas away from sensitive biological resources.</p>
226	<p><i>Fire barriers along the road sides can enhance the spread of fire tolerant alien species, such as fountain grass. Other alien species will be spread by the disturbed and bulldozed area along the road. The mitigation measures that call for regular inspection and removal of alien species need to be included in the final plan, and rigorously enforced.</i></p> <p>Commenters reasoning behind statement that fire barriers along the road sides can enhance the spread of fire-tolerant alien species is unclear. The FEIS documents the increased threat of the project to the native ecosystem from the expansion of alien species. Mitigation measures have been proposed to minimize the threat of the spread of alien species along the Saddle Road corridor (ref: FEIS - Part I, 3.18.3 and Part III, BO and MOU).</p>

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227	<p><i>Any lava tubes that will be opened up during construction should be inspected by trained biologists and archaeologists for presence of native cave species and for cultural remains. Mitigation should include plans to place conduits under the road to allow the lava tube to remain open and accessible.</i></p> <p>FHWA concurs with the first part of the commenters statement that any lava tubes opened during the course of construction be inspected by trained biologists and archaeologists for the presence of native organisms and artifacts. FHWA does not concur with maintaining access to biologically rich lava tubes uncovered as a result of construction. Following the inventory, lava tubes will be re-sealed so that no further disturbance will occur to the unique ecosystems and organisms supported in them.</p>
228	<p><i>With the tourist industry based in Kona, and Hilo the seat of county government on the east side of the island, it is critical that Saddle Road be upgraded to improve communication and transportation between these municipalities.</i></p> <p>Comment noted.</p>
229	<p><i>Commenter supports mitigation outlined in DEIS.</i></p> <p>Comment noted.</p>
230	<p><i>How can you run a highway through a protected area (Critical Habitat)?</i></p> <p>Under the Endangered Species Act of 1973 as amended, the modification of federally delineated Critical Habitat can be permitted providing sufficient mitigation is proposed to ensure that there will be no increased risk of extinction of the species for which the habitat was delineated.</p>
231	<p><i>The proposed project would not just impact 100 acres of Critical Habitat. Impacts would spill over or extend to adjacent areas. The road would fragment and isolate 500 acres of Critical Habitat.</i></p> <p>The FHWA is aware of this and the approximately 5,000 acres of replacement lands proposed is a clear indication of the comprehension of the level of concern that all of the involved agencies have over the further fragmentation of Palila habitat.</p>

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232	<p><i>Commenter concerned about Critical Habitat of native bird species with the selection of PTA-1 or PTA-3. Birds, including Palila, use these areas during the day for forage, and threats such as fire, removal of native vegetation, construction noise and activity, alien plant, animal and disease dispersal in the habitat are a serious problem. The area has already been negatively impacted by military maneuvers, enhancement of rodent populations due to improper food waste disposal, accidental fires and feeding on native vegetation by feral ungulates. None of these impacts have been dealt with appropriately by agencies charged with protection of endangered species.</i></p> <p>Refer to response to Comments 21, 57, and 314.</p>
233	<p><i>Proposed fencing of some areas of the project will be ugly and will not blend into the landscape.</i></p> <p>Visual impacts are addressed within the EIS. As stated, a notable change in visual quality and character would occur within Section II with the construction of the paved firebreak, fencing, and extruded curb. In the selection of fencing materials, consideration will be given to minimizing visual impact. To reduce contrast and blend more effectively with the surrounding landscape, fencing will be a naturally weathered metal or steel, or will be painted a dark color to be approved by HDOT. Fencing is not proposed continuously along the project to control access.</p>
234	<p><i>Not enough consideration has been given to non-vehicular modes of transportation, including bicycles, horses, foot traffic, and cross-island tram.</i></p> <p>Refer to response to Comment 275.</p>
235	<p><i>Commenter concerned about cumulative impacts of several projects on the floral and faunal communities which have developed on the 1881 and 1885 lava flows. These, including Saddle Road, Puainako Extension, Mohouli Extension and University Park and urban expansions need to be addressed in EIS, considered, and mitigated.</i></p> <p>The combined effects of other Federal and State ongoing projects and programs is addressed in the FEIS - Part I, 6.0. The information provided in the DEIS, 6.0, has been expanded in the FEIS - Part I, 6.0.</p>

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236	<p><i>Cave adapted species dependent on roots of native plants for food and shelter can be highly impacted by surface clearing and replacement of native vegetation with alien species. Commenter requests a map analysis be completed for the 50-150 year old flows to estimate the range and impact on this fairly rare and unique community.</i></p> <p>Potential impacts to cave adapted species as a result of surface clearing and loss of native vegetation are discussed in the FEIS (Part I, 3.12.2). The FHWA considers the referenced map analysis of the 50-150 year old flows outside the scope of this project in that it would not contribute substantially to the alternative selection decisions.</p>
237	<p><i>As written in DEIS, line 2 of Table 7, page 31, Estimated Biological Mitigation Costs for PTA-1, \$500,000 per unit appears inequitable when considering K.K. Ranch has more acres involved than S.C. Ranch and more productive acres involved than Boteilho (majority of Boteilho in lava).</i></p> <p>In order to provide opportunities for the rehabilitation of the Palila populations, lands in the Pu'u Mali area below the Mauna Kea Forest Reserve have been identified. These lands are currently in state pasture leases to three separate lessees: Boteilho, Hawai'i Enterprises, K.K. Ranch and S.C. Ranch. The cost of acquisition of these leased areas has been estimated at \$500,000 per unit for budgetary purposes to take into account lessee relocation, state administrative costs, surveying, subdivision mapping/platting, and state lease reimbursement. These amounts are not solely compensatory estimates for rancher's lease termination. Actual compensatory amounts for each impacted rancher will be determined on a case by case basis depending on the provisions of the lease and fair compensation practices as allowed by the Uniform Real Property Acquisition and Relocation Assistance Act.</p>
238	<p><i>The proposed, fenced 100-foot roadway through K.K. Ranch appears to be an unnecessary expenditure of funds, and would disrupt K.K. Ranch operations if constructed in the proposed location. Although historical maps show a four-wheel drive road in that location, it is no longer used and is impassable. Constructing a fenced road in that location would in essence cut off an additional 250 to 300 acres from K.K. Ranch. No watering infrastructure is located in the corridor that would be created between the roadway and the ranch's east boundary. Cattle grazing in that paddock currently are required to walk from the east boundary westward for water.</i></p>

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	<p><i>Upon request, K.K. Ranch has made another road further west on the lease available to DLNR and USGS/BRD personnel for their access to the Mauna Kea Game Management Area. If more routine use of the road would be made, assistance with maintenance of this road would be required.</i></p> <p><i>If the purpose of this road is to allow more than service personnel access to the Puu Mali area, i.e. public, we object to having such a road bisect K.K. Ranch. Such a road would significantly affect the quiet afforded K.K. Ranch by General Lease S-4475 and would severely disrupt ranch operations.</i></p> <p><i>For the past four years, K.K. Ranch has been the sole maintainer of the section of the road that passes through K.K. Ranch. The County has not maintained the road for the past four years, and the state has not maintained the road for the past seven years. Problems that have been encountered as a result of access by the public on Mana Road include cut fences, broken water pipes, shot holes in one water tank, breakin of house/cabin, stolen property, poaching, harassed and frightened livestock, cattle rustling. Police and DLNR enforcement personnel do not patrol the area.</i></p> <p><i>An access road to the proposed 1,864 hectares of land that would be withdrawn from the State pasture leases is required. This road must be open to the general public to allow access for hunting and other purposes. The final location of the roadway and its operation, fencing, and maintenance will be established in consultation with the lessees to minimize impact on their ranching operations.</i></p>
239	<p><i>Instead of improving Saddle Road, consider building a new road that begins in Honalo or Kainaliu and continues on the other side (east side) of Mt. Hualalai to the nearest place the Saddle Road comes to Kona side (west side). In this way, people from Kona Districts (north and south) will not have to drive into Kailua-Kona and almost to Waimea (which is half way to Hilo) before using the Saddle Road. This alignment would save time over that of Saddle Road. If Mt. Hualalai were to erupt it would cut off Kona District North and South. This road would serve two purposes.</i></p>

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	<p>The County of Hawai'i General Plan identifies a future highway that generally follows the commenter's described alignment. The General Plan indicates a desire to build such a road at some time in the future to augment the existing east to west transportation system as traffic volumes warrant. While the alignment has been documented to have merit, it would be considered a separate highway from Saddle Road and would not fully satisfy the purpose of and need for the proposed Saddle Road improvements. (One purpose of the project is to transport goods and services from Kawaihae Harbor and Hilo Harbor to the military base at PTA. A road from Kainaliu would not meet this purpose.) The commenter's described alignment is outside of the scope of the Saddle Road project, and was not considered in the EIS.</p>
240	<p><i>Hearing should not have been held on a Saturday. Many hunters could not attend.</i></p> <p>Two hearings were held for the project one on a week night and one on Saturday morning. Public comments were also accepted in writing through January, 1998.</p>
241	<p><i>PTA-1 transverses one of the best bird and game mammal hunting areas on the entire island. Both game birds and game mammals tend to feed and nest in the affected area and move uphill when pursued. During the afternoon and evening they move back down into the affected area to feed. The proposed realignment will cut off birds and mammals from their feeding and nesting area. In addition, any birds and mammals attempting to cross the realigned Saddle Road will only add to their mortality and destroy the entire area to hunting. Noise from the projected traffic will destroy the area to bird and mammal hunting.</i></p> <p>With the bisection of Trail 1 by the Recommended Alternative, the remaining units will still contain thousands of acres and, given the excellent game bird habitat, could easily support two independent units. Moreover, game birds will be able to cross the road, just as they currently do. Although some loss to mortality could occur, noise, traffic, or other factors associated with the road are not expected to have a substantial impact on hunting. A side-benefit of the mitigation for taking of Palila Critical Habitat is the opening of a substantial bird hunting area, about 1,864 ha at Pu'u Mali. There is no evidence to suggest that a serious impact to game bird hunting will occur as a result of bisecting Trail 1.</p>

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242	<p><i>The DEIS fails to take into account the long-term effect of the realignment not only to hunting but to the observatory, and the endangered birds and plants in the area.</i></p> <p>Potential impacts to the hunting are addressed in FEIS, in 3.3.4 Outdoor Recreational Resources and Hunting and in Terry 1997, Tech. App. Vol. V. Potential impacts to the observatory are addressed in the FEIS 3.1.1.2 <u>All Action Alternatives</u>. Potential impacts to endangered species are addressed in the FEIS, in 3.18 Threatened and Endangered Species, and in RANA 1997, Tech. App. Vol. III.</p>
243	<p><i>The light from automobiles would likely be a negative effect on the observatory.</i></p> <p>Refer to response to Comment 174.</p>
244	<p><i>The DEIS fails to consider the impact of the Dark Rumped Petrel from the projected traffic. It is known that lights at night disorient the Petrels returning to their nests on Mauna Kea.</i></p> <p>Comment noted. The issue of the interaction between Dark-rumped Petrels and lights is addressed in the FEIS (ref: Part I, 3.18.2). "It is probable that this species will overfly all or part of the project at least occasionally between May and October each year during the breeding season. This pelagic seabird returns to its nesting colony after dark. A major threat to Dark-rumped Petrels, especially to fledging birds, is being disoriented by lights on their way to sea. Disoriented seabirds often collide with man-made structures and if not killed outright the dazed or injured birds are easy targets of opportunity for feral mammals, or are subsequently hit by automobiles.</p> <p>To avoid the potential downing of Dark-rumped Petrels and Newell's Shearwaters by their interaction with external construction lighting, no construction lighting or unshielded equipment maintenance lighting will be permitted after dark between the months of April and October. This prohibition will be one of the Special Contract Requirements which will be incorporated in the construction contract documents. Since no street lights are planned for the improved Saddle Road through this section, potential impacts to this species will be negligible following the completion of construction efforts. There is currently no clear indication that car lights which are moving represent a threat to night-flying seabirds. It is thought that the reason that Dark-rumped Petrels and other night-flying seabirds can become confused by stationary lights is because they mistake them for the moon, which they use as a navigational aid.</p>

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245	<p><i>The area affected by the realignment was included in the Palila Critical Habitat although no Palila were known to nest in the area, because the sheep were destroying the mamane-naio forest. Experts agree that Palila are restricted to Mauna Kea between 6,700 feet and tree line. This elevation is well above the critical habitat in the affected areas. Research shows that the Palila has evolved into a specialized species which is subject to heat strokes at lower elevations. The Palila are primarily found in the Puu Laau on Mauna Kea because of its protected hills and lower fluctuations of heat and cold.</i></p> <p>Within the last 100 years Palila were known to be common between just below 4000 feet elevation and tree line (Perkins 1903). The current remnant population has been forced up to much higher mean elevations. The area within Training Areas 1 through 4, which will be impacted with the selection of PTA-1 was well within the breeding range of this species within recent historic times. Under the ESA of 1973 as amended, when the USFWS delineates Critical Habitat they are supposed to consider the expansion of the population, as well as its spread. In keeping with that rationale, it was logical for the USFWS to include suitable Palila habitat within the delineated Critical Habitat even if it was currently unoccupied by Palila. The ultimate goal of listing a species is to recover it over its previous range to a level where no further protection or special regulations are required to ensure the species survival.</p> <p>Under the Endangered Species Act, any federal action that may have an impact on any listed species or federally delineated Critical Habitat must consult with the USFWS under Section "7" of the Act to ensure that appropriate mitigation is in place so that the proposed action does not further endanger any listed species. It is assumed that the commenters assertion that the Palila has evolved into a species subject to heat stroke in lower elevations is based on Weathers and Van Riper (1982). This paper provides the results of a very limited study of four birds. These birds were studied at the Hawai'i Field Station at an elevation of slightly less than 4000 feet. The results of this lone, truncated study are not clear. The current core Palila population is centered around the Pu'u La'au area; however, the reason for this concentration is not thought to be "lower fluctuations of heat and cold," but rather a combination of factors which include the quality and extent of the mamane forest along a significant altitudinal gradient. (Cite: Perkins. R. C. L. 1903. Vertebrata (Aves). In Fauna Hawaiiensis, (D. Sharp, ed.). The University Press, Cambridge. <i>For range of Palila within the last 100 years.</i> 50CFR of federal register for Section 7 and ESA). W. W. Weathers and C. Van Riper III 1982. Temperature regulation in two endangered Hawaiian Honeycreepers: The Palila (<i>Psittirostra Bailleui</i>) and the Laysan Finch (<i>Pistirostra cantans</i>). The Auk 99: (4) : 667-674.</p>
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246	<p><i>On four separate occasions Palila were translocated to the Puu Mali area above the ranch lands sought for Palila mitigation, all four attempts met with failure. USFWS seeks land in three areas which do not support any Palila nor have supported Palila in recent decades. Kipuka 'Alala is the most extreme example of this. It is lower in elevation than any of the Critical Habitat areas and does not contain the large expanse of mamane trees which the Palila must have nor the necessary gradation of the trees. Lau's Ranch, while providing the necessary gradation, lacks the mamane expanse necessary for the Palila. The area does not provide the protection and restrictive temperature fluctuations which the Palila seeks.</i></p> <p>There have to date been two Palila translocation efforts into the Pu'u Mali area on Mauna Kea. Of the 25 Palila translocated in February and March 1997, all but one returned to the west side of the mountain. The current translocation experiment which is still under way has so far resulted in 7 of the 24 translocated birds remaining on the north side of the mountain. Though these results are less than hoped for, they do not represent complete failure. Scientists involved in the Palila translocation efforts feel that they have learned much about translocating Palila onto the north slope of Mauna Kea based on the first two attempts.</p> <p>Scientists strongly believe that both the Ka'ohē Lease parcel and the lands in Pu'u Mali will support Palila as soon as the associated mamane forest has regenerated sufficiently. The lands in the Kipuka 'Alala portion of the PTA supported Palila as late as the 1950's, there is reason to hold out hope that this area can once again provide at least seasonal foraging for Palila. With respect to temperature fluctuation within the last 100 years, Palila were known to be common between just below 4000 feet elevation and tree line (Perkins 1903). The current remnant population has been forced up to much higher mean elevations. It is assumed that the reference to Palila's thermal regulation limitations is based on Weathers and Van Riper (1982). What the authors suggest is that Palila are poor candidates for low altitude introduction, they also suggest that Common Amakihi have the same thermal regulation limitations – this species is readily found as low as 600 feet above sea level on O'ahu. Their study was performed on four Palila at the Hawai'i Field Station at an elevation of slightly less than 4000 feet. These birds were then moved to the Honolulu zoo which is located at only a few feet above sea level. Refer to response to Comment 22.</p>
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248	<p><i>Eighty percent of EX-2 crosses barren a'a lava fields, where there are no endangered plants or birds or problems associated with the introduction of alien weeds.</i></p> <p>Although the selection of Segment EX-2 avoids the direct take of critical habitat, it does not fully meet the important project objectives of separating military and civilian traffic and improving the quality of training at PTA. Only a small segment of EX-2 on the eastern end of the alignment traverses 'a'a lava fields; the remainder traverses high desert chaparral.</p>
249	<p><i>Retain EX-2 between Hale Pohaku Road and Mauna Kea State Park and realign along PTA-1 for the remainder of its length within Section II, as a potentially reasonable solution to Palila Critical Habitat impacts.</i></p> <p>Commenter's suggestion would reduce but not eliminate the taking of Palila Critical Habitat. As with PTA-1, PTA-3, and EX-2, this suggested refinement would necessitate some level of Palila mitigation. See also response to Comment 150.</p>
250	<p><i>EIS should disclose how the involved agencies and private parties will comply with other provisions of the state and federal endangered species laws (HRS Chapter 195D and 16 USC 1531 et seq.), including a discussion on whether HRS Chapter 195D authorizes any incidental take of listed species resulting from the proposed highway construction.</i></p> <p>Since no threatened or endangered species have been found within the ROW no take of any listed species is proposed.</p>
251	<p><i>The proposed project will adversely affect dry native forest ecosystems, most of which are unique and extremely rare. The DEIS should discuss how, specifically, the involved agencies and private parties will enhance and restore native ecosystems in the region to compensate for the loss and degradation of these systems resulting from the realignment.</i></p> <p>Comment noted. Substantial mitigation is proposed to offset the alteration of the mamane forest being modified by this action (ref: FEIS - Part I, 6.2 and Part III, BA, BO).</p>

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252	<p><i>Traditional and customary practices must be accommodated by the proposed action, and to the extent other land uses, such as recreation, are diminished by the project, they should be enhanced elsewhere in the region.</i></p> <p>Traditional and customary practices have been identified and are being accommodated through the mitigative measures agreed upon by FHWA, SHPO, and ACHP. These measures have been agreed to, and will be monitored by the regulating agencies that are signatories to the Memorandum of Agreement (FEIS - Part III, MOA).</p> <p>The EIS notes that, on the whole, the impact to recreation is beneficial, by providing better access to recreational sites, safer roadside conditions for gathering, and scenic pullouts for better enjoyment and appreciation of the roadside environment.</p>
253	<p><i>EIS should include the specific funding sources that have been committed to implement the proposed mitigation measures; a schedule for implementing the mitigation measures in relation to highway planning and construction; benchmarks to measure the effectiveness of the mitigation measures; and a contingency plan in the event the anticipated funding sources for mitigation are not secured.</i></p> <p>Refer to response to Comments 207 and 138.</p>
254	<p><i>USFWS established a camp in the middle of the Pu'u Laau Palila cell. Commenter concerned about agency's ability to manage the lands.</i></p> <p>The BRD/USGS did set up a field camp within the core Palila area, this was to monitor and study the species. The USFWS will not be the only agency charged with implementing the mitigation tasks and the DLNR will retain control of the replacement lands with management decisions guided by the MOU stipulations (ref: FEIS - Part III, BO and MOU).</p>
255	<p><i>Management of the Joint Astronomy Centre in Hilo states their strong endorsement of the proposed improvements to Saddle Road.</i></p> <p>Comment noted.</p>
256	<p><i>Traffic analysis estimates are deficient. Inadequate information provided in DEIS on traffic model used, trip generation, trip distribution, modal split, or network assignments. DEIS does not estimated induced demand such as new trips generated when car rental agencies allow tourists to use Saddle Road.</i></p>

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	<p>Traffic projections are based on those provided by the Statewide Transportation Planning Office and the Long Range Highway Plan for the Island of Hawai'i. Both of these traffic modeling efforts forecasted year 2010 traffic volumes for the Saddle Road corridor to be in the 9,000 to 10,000 ADT range. Estimates for the year 2014 were made using recent historical growth rates largely influenced by the development trends in west Hawai'i to date. These growth rates were then conservatively increased to attempt to account for induced traffic resulting from increased use of the Saddle Road by visitors and other recreational users. It should be recognized that, with a lack of historical data on which to model west Hawai'i development and a Saddle corridor travel opportunity, the algorithms for any future trip generation, distribution, and traffic assignment models could not be expected to yield results within acceptable confidence limits.</p>
<p>257</p>	<p><i>What percentage of collisions historically have been related to roadway factors? Is there evidence that safety will be enhanced by the proposed improvements? If travel demand increases, then accidents too will increase. EIS should discuss the relationship between traffic volume, collisions, and injury severity.</i></p> <p>While specific causal factors for accidents are difficult to determine, it is reasonable to state that because of the commuting nature of travel across the Island, many of the accidents on Saddle Road result from motorists attempting to drive beyond safe operating speeds for the design and condition of the existing road. The current accident rate is 81 percent higher than the average two-lane roadway accident rate in Hawai'i. The average rate is representative of roadways built to modern standards and in better condition than Saddle Road. Therefore, it is reasonable to predict that accident rates will be reduced toward the average rate by providing a modern facility.</p> <p>While it is true that the number of accidents will probably increase with a growth in traffic volumes to 14,000 vehicles per day, historical data indicates that the severity of accidents will decrease as well as the frequency (accidents per vehicle miles traveled) of accidents. Moreover, should the roadway remain in its present condition with the predicted increase to 4,000 vehicles per day, accident rates could be easily expected to double in frequency from that of the average rate.</p>

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258	<p><i>Document provides inadequate discussion of the project's potential effects on Kaumana Drive through Hilo. DEIS claims that these effects will be mitigated by the proposed extension of another road from Hilo. EIS must give the data and time frames for this other project.</i></p> <p>The Puainako Street Extension from Hilo is in the DEIS stage of project development presently. This project is planned to be constructed prior to the Saddle Road project in Sections III and IV.</p>
259	<p><i>DEIS does not provide much justification for combining the two economies via Saddle Road. EIS should include a more detailed sectoral analysis, including discussion of labor market conditions, investment opportunities, and projected growth rates for both economies. Background information should also be provided to indicate the effect of the Saddle Road improvements on the Institute for Astronomy and PTA. The present road has been a handicap to both of these organizations.</i></p> <p>A detailed sectoral analysis of the Island economy would provide interesting information, but such an effort is considered beyond the scope of the present EIS. The purpose and need for the improvements to Saddle Road are <u>not</u> proposed with the intent of combining the economies of Hilo and Kona.</p> <p>Ideally, visitor information to Mauna Kea and PTA could be analyzed to develop baseline conditions and make projections of increased visitation based on improvements to Saddle Road. Unfortunately, detailed visitation data do not exist and only qualitative assessments can be made. Qualitatively, improved travel conditions on Saddle Road would provide greater access to Mauna Kea observatory facilities resulting in increased visitation and, perhaps, adverse impacts to some scientific processes. Improved road conditions would also facilitate access to PTA by both military and non-military vehicles. Additional security measures may be required with increased potential for visitation. These security measures are being studied presently by the Institute of Astronomy, University of Hawai'i-Hilo.</p>

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260	<p><i>DEIS lacks attention to cumulative and secondary effects. As the project will likely lead to greater urbanization both along the corridor and in more remote areas, probable impacts include the need for greater police presence, fire and ambulance services, as well as gas stations and other services. DEIS needs to discuss potential secondary and cumulative impacts such as development and commercialization on adjacent land including Department of Hawaiian Home Lands property.</i></p> <p>Refer to response to Comment A176 and FEIS, 3.1 Land Use and Related Governmental Plan and Policies.</p>
261	<p><i>None of the proposed mitigation areas has the extensive elevational distribution of mamane forest that is described on page 21, paragraph 2 in DEIS, thus making this a biological gamble at best.</i></p> <p>Both the Pu'u Mali and Ka'ohe Lease lands abut good mamane forest providing the potential for increasing the existing elevational distribution of the forest. The Kipuka 'Alala parcel, on the other hand, does not have the potential for the elevational distribution of mamane referenced. This area is being considered for slightly different reasons. The justification and rationale for proposing lands within Kipuka 'Alala for Palila mitigation are stated in the USFWS letter to Moore, dated October 1996 (ref: FEIS - Part II, 1.4.3) at the start of informal consultation with the service under Section 7 of the ESA and FEIS - Part I, 3.18.</p>
262	<p><i>Commenter concerned about direct and indirect impacts on hunting areas, directly the loss of PTA areas 1, 2, 3, and 4 (commonly known as Trail 1).</i></p> <p>Comment noted. Impacts to hunting resources are provided in the FEIS (FEIS, 3.3.4 Outdoor Recreation Resources and Hunting).</p>
263	<p><i>As a nondirect impact, the prime bird hunting Ka'ohe Lease areas, known better to hunters as Lau Ranch, may be lost. This is a prime bird hunting area, and the premier public pheasant hunting area with easy walking access.</i></p> <p>The management plan for the Ka'ohe Lease will explicitly permit bird hunting, to the extent it is consistent with the objectives of mamane habitat restoration. This is identical to the management plan currently in place in the adjacent Ka'ohe Hunting Unit, which in 1996 reported the numerically greatest harvest of game birds of all Big Island hunting units.</p>

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264	<p><i>Commenter concerned that the proposed mitigation plan is not good for hunters because hunting access is likely to be denied in the future. By removing feral ungulates, the grasses will grow and grow high enough to become a fire hazard. As proposed, the Oversight Committee will have the right to close the area if a fire hazard exists.</i></p> <p>The condition of the Oversight Committee was eliminated from the mitigation plan. DLNR will retain full control of management of replacement lands under the guidance of the Palila Mitigation MOU (ref: FEIS - Part III, BO and MOU). With regard to Palila Critical Habitat replacement lands proposed in the mitigation plan, feral ungulates are all but non-existent in the Pu'u Mali area, and are very scarce in the section of the Ka'ohe lease lands that are being proposed for mamane restoration. A change in the management regime in these two areas is not likely to show any substantive change in the number of feral ungulates.</p> <p>The Kipuka 'Alala parcel clearly supports a high density of feral ungulates; the fencing and removal of these ungulates will result in changes to the ground cover. Most of the area that is being proposed for fencing in this parcel is currently covered with closed canopy naio/mamane forest. It is not expected that there will be a large increase in pyrophitic grasses within this parcel. No evidence was found that hunting was ever allowed on this parcel.</p> <p>Currently, all areas that are open to public hunting are subject to closure when it is deemed that a high fire risk is present. Lands currently closed to hunting that will be opened to public hunting as a result of the mitigation program, will be subject to the same rules as any other public hunting areas controlled by the State of Hawai'i, or in the case of Kipuka 'Alala, those overriding special conditions that the Army may impose in accordance with the Sikes Act as ammended.</p>
265	<p><i>If all cattle are removed as part of mitigation, the dung beetle, a favorite food of the pheasant, will disappear. This will hurt the pheasant population severely.</i></p> <p>Ring-necked Pheasant in Hawai'i are omnivorous in their diet, they select food in direct relation to the general availability of food items in any given habitat, they are primarily graniverous, but readily take animal matter. In studies conducted in Hawai'i it was found that between 5 and 15 percent of Ring-necked Pheasants' diet consisted of animal matter (Schwartz and Schwartz 1949). Given the results of this study and numerous others from the mainland, it is assumed that the removal of cattle and the dung beetle will not substantially affect the pheasant's food source.</p>

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266	<p><i>If the road must go through Critical Habitat, mitigation to hunters for loss of hunting resources should be direct and in the form of some additional lands with reasonable and guaranteed access.</i></p> <p>A substantial area (about 1,864 ha at Pu'u Mali) of additional hunting land will be supplied with the selection of the Recommended Alternative. Although access will be more difficult than at Humu'ula, it will have the advantage of not being subject to priority military use.</p>
267	<p><i>The discussion of preservation of hunting resources in the DEIS is aimed primarily at bird hunting. Consideration should be given to the preservation of ungulate hunting in some of these areas and to have a firm commitment so there is no loss to these resources, since so much has already been lost in the past several years. Mitigation for mammal hunting impacts should be taken into consideration.</i></p> <p>Assumption is made that commenter is referring to cumulative losses in mammal hunting resources from a number of unrelated actions on the Island of Hawai'i. Commenter is concerned that the Saddle Road project will add to this trend. Historical changes in hunting lands from unrelated actions and the potential impact to hunting resources from the implementation of the Saddle Road project are addressed in the Technical Appendices, Terry 1997, Volume V, Social Impact Assessment, Impacts to Hunting, and are summarized in the FEIS, 3.3.4 Recreational Resources and Hunting. It is important to note that much of the losses referenced are the result of court-ordered actions designed to remove and exclude ungulates from specific native habitats to protect native habitats and the threatened and endangered species that rely on them for survival.</p>
268	<p><i>Commenter supports proposed project as a means to create jobs.</i></p> <p>Comment noted.</p>
269	<p><i>Businesses want to invest in our community. But without improved infrastructure and a better business climate, future job opportunities for our children are bleak. The building of this road together with the increased cross-island traffic will allow businesses to expand their market base and become more secure and viable.</i></p> <p>Comment noted.</p>



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270	<p><i>Commenter states that managing agencies, such as DLNR, have a poor record of completing projects.</i></p> <p>Comment noted.</p>
271	<p><i>Commenter concerned that State of Hawai'i would be responsible for maintaining mitigation areas.</i></p> <p>Refer to response to Comment 138.</p>
272	<p><i>Commenter concerned about noise impacts from projected increases in traffic on Mauna Kea State Park.</i></p> <p>Refer to response to Comment 130.</p>
273	<p><i>Commenter disagrees with assertion that military training potential will increase with the selection of PTA-1 or PTA-3.</i></p> <p>Comment noted.</p>
274	<p><i>Commenter supports project with conditions and/or preferences.</i></p> <p>Comment noted.</p>
275	<p><i>Consider possible future transportation needs, such as rail, pedestrians, bicyclists, equestrians, and tourists.</i></p> <p>Future needs for the Saddle Road corridor were based on a 20-year planning period, a standard practice in this industry. Vehicular traffic projections over this 20-year period did not warrant planning for rail facilities at this time. Consideration was given to safety for pedestrians, bicyclists, and equestrians through the Preliminary Engineering and EIS process. With the proposed project, improved safety for bicyclists and pedestrians would result with construction of adequate, 2.4-m shoulders. Within Section II, the paved firebreak would function as a bike route, providing additional area suitable for use by pedestrians, bicyclists, and equestrians. With the proposed improvements to Saddle Road, it is anticipated that car rental companies would lift their restrictions related to travel on Saddle Road, allowing more tourists the opportunity to view and recreate within the saddle corridor.</p>

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276	<p><i>Commenter supports repaving the existing alignment in certain areas.</i></p> <p>Comment noted.</p>
277	<p><i>Commenter concerned that more and more areas will be fenced, eventually taking away more and more hunting areas. In the future, it may not be possible for people to access the upper Waiakea forest for traditional hunting and gathering purposes.</i></p> <p>There are no plans to fence areas in the Waiakea forest as part of the Saddle Road project. In general, the result of the mitigation measures for impacts related to the Saddle Road is the opening up of additional lands to public use.</p>
278	<p><i>Commenter concerned that taxes will increase on the East side of the Island once the road improvements allow westerners to come onto this side.</i></p> <p>With the proposed improvements to Saddle Road, an increase in visitors from the west side of the island to the east, is anticipated. This increase would be expected to result in only a minimal potential to adversely impact local taxes on the west side of the island. With increased visitation, the volume of sales taxes would be expected to increase, providing more tax revenue. An increase in sales tax revenues would decrease the need to increase sales tax rates.</p> <p>While the majority of visitors from the west side of the island will not likely be looking for real estate, a small increase in purchasers of property could result in a slight increase in property values. Increased property values might result in higher taxes, although it would be difficult to distinguish the impact attributable to increased property versus that attributable to normal inflation.</p>
279	<p><i>The quality of life issues associated with hunting are important.</i></p> <p>Comment noted.</p>
280	<p><i>Trail 1 is full of birds this season. The selection of PTA-1 would impact hunting in this area.</i></p> <p>Comment noted.</p>

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281	<p><i>Commenter states that DEIS does not disclose that there are endangered plants in "there."</i></p> <p>Reference to area is unclear, presumably referring to PTA-1 or Trail 1 area. No endangered plants are currently known to exist within the PTA-1 or Trail 1 areas.</p>
282	<p><i>Commenter concerned about long-term commitments to weed and fire management. Commenter states discomfort with DLNR's track record on commitments to management.</i></p> <p>The roadside weed management will fall under the jurisdiction of the HDOT who has agreed to apply biologically sensitive techniques. As to the Palila replacement lands that will require long-term weed management, DLNR will be the sole agency charged with implementing this phase of the proposed Palila mitigation and will be guided by stipulations in the Palila Mitigation MOU, which will be monitored by the FHWA. .</p>
283	<p><i>If ranch land were taken out of existing ranching leases for the project, would ranchers be compensated for their loss of profit in their land?</i></p> <p>Refer to response to Comment 181.</p>
284	<p><i>If the mitigation packet goes through, that section of Mauna Kea would no longer be essential habitat for the Palila. This area should be turned back to sheep country.</i></p> <p>Modification of the habitat does not render it unfit in the future for Palila as long as it is not an adverse modification. Also, the state is under a federal court consent decree to eliminate feral ungulates from Palila Critical Habitat (ref: FEIS - Part III, BO).</p>
285	<p><i>Commenter notes openness of EIS process and proceedings.</i></p> <p>Comment noted.</p>
286	<p><i>Improvements to Saddle Road were initiated to save lives, and minimize accidents, injuries and equipment damage caused by the extreme conditions on Saddle Road.</i></p> <p>Comment noted.</p>

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287	<p><i>Please ensure that there is access to the national oceanographic and atmospheric agency station at the 11,000 feet level on the north face of Mauna Loa.</i></p> <p>The proposed project would not adversely affect existing access to the national oceanographic and atmospheric agency station referenced by commenter.</p>
288	<p><i>Mountain grass creates a fire fuel problem. It holds the fire up to the trunks of the trees until they die.</i></p> <p>Assumption is made that commenter is referring to fountain grass. Fountain grass burns extremely hot which tends to kill much of the other vegetation and many propagules of other species that are trapped in a fire. To date, no scientific modeling of the potential effects of a fast-burning fountain grass fire on mamane have been produced, this is one of the models that will be explored by the fire ecologist to be contracted as part of the proposed Palila mitigation plan for this project.</p>
289	<p><i>Army's training should include more emphasis of the east side of the PTA, which is not being used much now.</i></p> <p>Comment noted.</p>
290	<p><i>Commenter is opposed to PTA-1 and PTA-3, but states that something should be done to accommodate the army's training, particularly artillery, to eliminate firing across the road.</i></p> <p>Comment noted.</p>
291	<p><i>Commenter is runner and desires that shoulders be no more than 2 percent in grade, at 8 feet in width.</i></p> <p>Refer to response to Comment 201.</p>
292	<p><i>Commenter opposed to unnecessary construction of fences when they prevent access to hunters or recreationists. Only put fences where necessary to keep out unwanted animals.</i></p> <p>Comment noted.</p>

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293	<p><i>Consider truck climbing lanes in Sections I and IV, since all traffic will be traveling up hill.</i></p> <p>Climbing or passing lanes will be incorporated into the roadway design throughout the project where warranted (FEIS - Part I, 2.1). Actual lengths and locations of these lanes will be determined during the project final design phase. These lanes will be constructed in addition to roadway shoulders and fire breaks, which must be available at all times for their intended safety and fire prevention purposes.</p>
294	<p><i>Commenter concerned that new road alignment would encourage development of Mauna Kea.</i></p> <p>Commenter's point is unclear. It is assumed for the purposes of this response that commenter is concerned about further development of the observatory facilities on Mauna Kea. Refer to response to Comment 242 (ref: FEIS - Part I, 3.1 and 3.3.4, and Part III, TCP).</p>
295	<p><i>Commenter states a need for everyone to work together.</i></p> <p>Comment noted.</p>
296	<p><i>Commenter supports selection of Segment EX-3 through Section III.</i></p> <p>Comment noted.</p>
297	<p><i>Commenter suggests that a hunter, selected by vote of the hunting community, serve on the Oversight Committee.</i></p> <p>Refer to response to Comment 264.</p>
298	<p><i>Commenter requests that no new fencing be constructed anywhere out of PTA proper.</i></p> <p>Comment noted.</p>
299	<p><i>Many people exceed the speed limits, which contributes to accidents.</i></p> <p>Comment noted.</p>

**TABLE 4.1.1**  
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300	<p><i>Is the proposed realignment going through a mamane forest, include the habitat and endangered plants?</i></p> <p>The PTA-1 and PTA-3 alignments were proposed through both Critical Habitat and an area that supports endangered plants because this alignment best fulfills two of the stated purposes/needs of the roadway improvements, i.e., the separation of military training activity and civilian traffic on Saddle Road and the improvement of the safety and quality of military training in PTA. During environmental inventories, no listed plant species were found within the proposed ROW. This realignment also allows for improvement of the quality of military training in the area.</p>
301	<p><i>Opening up Pu'u Mali to hunters is only a short term benefit, until it becomes enclosed by mamane trees.</i></p> <p>Reason for commenters suggestion is unclear. With the exception of areas closed during the war and during periodic training conflicts, the remaining mamane forest on Mauna Kea, has been open to hunting since hunting has been regulated on the island.</p>
302	<p><i>Commenter desires the existing section of Saddle Road through Section I remain open, so that people traveling between Waimea and Hilo will not be required to drive an additional 6 miles to access Saddle Road.</i></p> <p>With the selection of W-3 as the Recommended Alternative, the existing Saddle Road from MP 42 to the Mamalahoa Highway will remain open for local travel. A high-type, at-grade intersection will be provided at the junction of the existing road and alignment W-3 to accommodate all traffic movements. It is anticipated that, with higher speeds, safer design, and total savings in time by using W-3 between Waimea and Hilo, motorists will use the improved facility rather than the existing road. Maintenance of the existing road will be undertaken by Hawai'i County, HDOT, or a combination of both.</p>

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303	<p><i>When sheep and goats were eradicated on Mauna Kea previously, they were left to rot. Commenter desires that hunters go in and clear the areas of unwanted animals and that the killing not be for naught.</i></p> <p>In the proposed Palila mitigation plan, the following verbage addresses this comment. "In the event that a need is identified to harvest feral ungulates on the parcel, the public hunting community shall be allowed to attempt to lower numbers to levels in keeping with the primary goal of restoring mamane habitat. In the event that they are unsuccessful, DLNR shall conduct a staff hunt as needed to attain the goals identified."</p>
304	<p><i>Commenter notes that he must live on O'ahu in order to work because of inadequate number of construction jobs on the Island of Hawai'i.</i></p> <p>Comment noted.</p>
305	<p><i>Families are torn apart by the lack of jobs, when young people move to other islands or to the mainland.</i></p> <p>Comment noted.</p>
307	<p><i>Commenter recommends the selection of W-2 within Section I because if W-3 were selected the traffic traveling west on Saddle Road will turn right on Highway 190 and drive up to Waikoloa Road for access to Ka'ahumanu Highway.</i></p> <p>The Final EIS reports the results of a study conducted in February 1998 indicating that only 5 to 20 percent of west-bound Saddle Road traffic also uses Waikoloa Road. The majority of motorists are bound for Kona, with most of the remainder bound for Waimea. From the perspective of serving most motorists on the Saddle Road, W-3 is preferable.</p>

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308	<p><i>Commenter doubts that funds will become available for the project.</i></p> <p>Funding commitments for the proposed project within the PTA have been made by the DOD for the environmental documentation and construction. These funds depend, however, on the passage of funding appropriations legislation on a yearly basis. Funding for sections of the proposed project outside of the PTA have three possible future sources: State Funds, Federal-Aid Highway Funds, and DOD funds (if sections outside of PTA are designated as Defense Access Road Program eligible). The availability of these funds at the time of need are dependent upon future State and Federal legislative actions. Funding for the short-term and long-term needs of Palila mitigation are tied to PTA-1 and are proposed to be obligated from DOD monies either through the DAR Program as part of the construction cost of the project or through the USAG-HI EMP.</p>
309	<p><i>In many places along Saddle Road, one cannot stop to assist other motorists because there is no safe place to pull over.</i></p> <p>Comment noted.</p>
310	<p><i>Commenter wants road improvements made so that tourists in rental cars can experience the Saddle area.</i></p> <p>Comment noted.</p>
311	<p><i>Fences, eight-foot wide paved shoulders and fire breaks, associated with the project will detract from the physical appearance of the road.</i></p> <p>Comment noted. Refer to response to Comment 233.</p>
312	<p><i>USFWS should not have the right to take Critical Habitat of the Palila, protected by the Endangered Species Act, and then to compensate, deprive hunters of resources in Pu'u Mali.</i></p> <p>The USFWS clearly is empowered under Section 7 of the Endangered Species Act of 1973 as amended to allow for the modification of Critical Habitat providing that suitable mitigation is proposed and implemented. The mitigation proposed will not deprive hunters of resources in the Pu'u Mali area, this area has been closed to hunting for many years. The opening of this area for hunting will in fact provide an additional 5,000 acres of hunting lands previously unavailable to the public.</p>



**TABLE 4.1.1**  
**Numerical Listing of Summary of Public Comments and Responses**

313	<p><i>Commenter concerned about greater environmental and safety problems that will occur on the north coast, and through Waimea, if Saddle Road is not improved.</i></p> <p>Comment noted.</p>
314	<p><i>Commenter concerned about impacts to Palila with PTA-1 and PTA-3.</i></p> <p>Currently the mamane habitat found along PTA-1 and PTA-3 is uninhabited by Palila. The construction of the roadway will modify the Palila Critical Habitat within this area. By modifying the federal delineated Palila Critical Habitat, the project has been required under Section 7 of the Endangered Species Act of 1973, as amended to provide substantial onsite and offsite mitigation to ensure that the Palila and its habitat will not be adversely impacted (ref: FEIS, 3.18.3, Section II).</p>
315	<p><i>Are more rest areas planned for the project to offer scenic and cultural areas for our visitors?</i></p> <p>Each of the action alternatives included consideration for scenic pullouts or vista points. These would include parking and interpretive signing. They are not envisioned to include restrooms or other rest area facilities.</p> <p>Presently, PTA personnel and facilities are available to assist stranded or injured motorists. PTA personnel also respond to traffic accidents and fires with emergency services. Depending on need, response time, and availability from other providers, these PTA services are provided along Saddle Road, well outside of the PTA boundaries. In addition, for a 20-km segment of the proposed project within the PTA, roadside emergency phones are proposed to be installed every 2-km. Appropriate traffic control warning devices and signage will also be installed as warranted to provide motorists advanced warning of travel conditions. Refer also to response to Comment 108.</p>
316	<p><i>What is the percentage of total project cost would be for mitigation? Please break down by type.</i></p> <p>Refer to response to Comment 189. In addition, a complete breakdown of mitigation costs is provided in the Palila Mitigation MOU (ref: FEIS - Part III).</p>

**TABLE 4.1.1**  
**Numerical Listing of Summary of Public Comments and Responses**

317	<p><i>What is the justification for the selection of Kipuka 'Alala as mitigation lands?</i></p> <p>The justification and rationale for proposing lands within Kipuka 'Alala for Palila mitigation are stated in the USFWS letter to Moore in October 1996 (ref: FEIS - Part II, 1.4.3) at the start of informal consultation with the service under Section 7 of the ESA. Also see FEIS Part I, 3.18.3, Scientific Basis for Palila Mitigation.</p>
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#### 4.2 Written Correspondence Received from Public Regarding DEIS

This section of the FEIS provides a copy of all written correspondence received from the public during the formal comment period regarding the DEIS. The section begins with a Correspondence Index, which lists the names of the commenters and the date of their letter (or approximate date if no date was included). Because of the high volume received, letters have been reduced to fit two on each page. [Public comments presented during oral testimony at the public hearings for the project are included within the Hearing Transcripts (ref: FEIS in Part II, 2.2)].

Comment code numbers are noted within the index and marked within the margins of each letter to refer the reader to the most applicable comment summary(ies) and the associated response (ref: FEIS - Part II, 4.1).

#### Correspondence Index

Name	Date of Comment	Comment Codes
Acree, Robert	12-17-97	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11
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Aguilar, Marie	12-20-97	14, 15, 16, 17, 18, 19, 20, 21, 22, 23
Albertini, Jim	12-11-97	24, 25, 26, 27
Bachman, Ronald E.	12-13-97	28, 29, 30, 31, 32, 33, 34
Barton, Liz	12-13-97	35, 36
Barton, Lou Ann	12-18-97	2, 3, 4, 6, 37
Bergin, Dr. Billy	12-8-97	38
Bethea, Robert E.	12-9-97	36, 39
Bigelow, David L.	12-17-97	4, 5, 6, 40, 41, 42, 43, 44
Bruce, Phil	12-11-97	45
Buyers, J.W.A.	12-12-97	36, 46
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Cadwallader, Gary N.	12-18-97	3, 4, 5, 6, 12, 13, 51, 52,
Carlson, Carl A. Jr.	12-17-97	36, 53

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<b>Name</b>	<b>Date of Comment</b>	<b>Comment Codes</b>
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Cooper, Robert E.	11-27-97	36
De Conte, John Jr.	12-11-97	36
De Luz, Diane	12-11-97	36
Dore, Dr. John E.	12-16-97	71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86
Foster, Larry	12-13-97	87, 88
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Goya, Tom	12-12-97	1, 36, 39, 89, 90
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(Name illegible) P.O. Box 2113 Keaau, HI	12-10-97	36, 203

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Tsukazaki, Ben R.	12-22-97	2, 3, 4, 5, 6, 7, 42, 43, 52
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Wakano, Ethel	12-18-97	36, 39
Ward, Deborah	12-21-97	121, 176, 206, 207, 225, 231, 232, 233, 234, 235, 236
Wassman, Nancy J.	12-11-97	1, 36
Watt, James B.	12-13-97	184
West, Roger E.	12-20-97	239
Whittington, Noelani	12-4-97	1, 36, 38, 99
Yamada, Kats	12-18-97	28, 29, 22, 47, 49, 177, 241, 242, 244, 245, 246, 247, 248, 249
Ziegler, Marjorie	12-22-97	176, 250, 251, 252, 253
(Name illegible) 851 Leilani St. 96720	12-13-97	22, 47, 50, 63, 246, 254
Henderson, Richard	12-8-97	317, 318
Robson, E.I.	12-8-97	36, 121
Harrison, John T.	12-23-97	256, 257, 258, 259, 260

December 18, 1997

TO: BERT MCCAULEY  
FROM: ROBERT ACREE  
RE: SADDLE ROAD EIS

Dear Mr. McCauley,

I am transmitting by Facsimile my comments on the EIS for the Saddle Road. Please replace the letter sent earlier today with this letter.

Sincerely,

*R. Acree*

Robert Acree

Robert Acree  
206 West 34th Avenue  
Anchorage Alaska 99503  
(907) 716-3178 FAX (907) 716-3178

December 17, 1997

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Denver, CO 80228

TRANSMITTED BY FACSIMILE

Dear Mr. McCauley,

I am the owner of Increment II of Waiki'i Ranch which comprises 1031 acres. This property received zoning approval in the early 1980's and includes a total of 74 ranch parcels ranging in size from 10 acres to over 40 acres. Subdivision approval from the County of Hawaii has been obtained and I am now in the process of finalizing engineering plans for construction.

The following are my comments on the Environmental Impact Statement for the Saddle Road.

- 1 1. I support a cross island route between Hilo and West Hawaii for the obvious reasons of safety for motorists and the economic benefits it would bring to the Island of Hawaii.
- 2 2. I do not support the W-2 alignment because of the impact it would have on the current and future residents of the Waiki'i Ranch.
- 3 3. Waiki'i Ranch is the only residential community along either the W-2 or W-3 alignment. I cannot understand how a major highway could be proposed only 1200 feet from this community when there are other alternatives available.
- 4, 5 4. The noise generated from the W-2 alignment will have a serious adverse impact on the peaceful enjoyment of the residents as well as an adverse effect on their property values.
- 6 5. The lights from the automobiles traveling the W-2 alignment will forever destroy the tranquility of the residents.
- 7 6. The noise and lights will also have a negative impact on the livestock operations of the property owners.

**RECEIVED**  
JAN 2 1998

OKAHARA & ASSOC., INC.  
KAILUA-KUNA OFFICE





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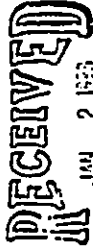
DEC 29 1997

~~INTERNAL SECURITY~~

FHWA , Box 50206  
300 Ala Moana Blvd.  
Honolulu, HI 96850

December 20 , 1997

Marie Aguilar  
P.O. Box 1874  
Kailua-Kona HI 96745



OKAMAHA & ASSOC., INC.  
KAILUA-KONA OFFICE

Attention: Mr. Abraham Y. Wong  
Division Administrator

Dear Mr. Wong,

I am responding to you during this DEIS review period for the Saddle Road project on the Big Island. I have reviewed the Saddle Road Project Bulletin. I found this bulletin very informative and yet it was also vague in certain areas. This review period should consider questions and comments that allow the residents to come forward. Your recent announcement of a meeting on December 11, 1997 at the Royal Waikoloa gave the residents less than a week to prepare for this meeting, and for those who could not attend from the Kona area, there was only another meeting scheduled two days later. This was not ample notice for the residents, including myself to prepare for this meeting. We were allowed to respond to your office just three days before Christmas. This makes it very difficult for residents on this island to respond adequately. I am requesting that more time be given to residents on the Big Island another 60 days to respond to this project.

16 This Saddle Road Project is over ambitious from the on set. An island with one hundred and thirty thousand residents does not warrant this type of expense. Those residents south of Captain Cook would not use this highway as it is closer to go to Hilo by the southern route of 190 Mamalahoa Highway. Also residents from Havi would not take this route as they would use the original highway which travels the perimeter on the Hamakua coast. For the bulletin to state that the improved Saddle Road would improve the economy of East Hawaii for future jobs in 'foundless. The cost to travel to West Hawaii makes it seem very unreasonable.

17 I have to question why the bulletin did not disclose the type of usage that the military at Pohakuloa Training Area intends over the next ten years. It is clear to all that this road need much improvement, however, upon reading the specific details concerning Sections I, Sections II, and III, I have to question the explanations because of the type of wilderness this area has. This area could qualify for wild-

ness status. However, it can not, due to the fact that some of the project has adjoining private property owners. This area has for hundreds of years been protected. The project now will forever change the historical archeological sites. There are few societies that would allow the destruction of archeological sites, at least of all knowing it. I realize there has been extensive studies regarding this area, however, I have personally spoken to field workers that have been unhappy with the findings on the re-location of the pali. They have not been able to find any of the birds in their new location. It would seem that nature and the military may not be compatible, but trying to alter the habitat, could result in extinction. This is a real concern.

20 All of the precautions mentioned in your bulletins seemed very thorough, however, why would you use a herbicide in an area where there are endemic plants and birds. Please do not over consider spraying in this area. It is well known through your studies and other studies that there are a number of endangered plant species and birds here. Is this project so important to speculate how these species may or may not survive. Consider all these and make a road which will service the island for its need and size, without the cost of our fragile environment.

21 Thank you for your consideration.  
Mahalo.

Sincerely,

*Marie Aguilar*  
Marie Aguilar

**PUBLIC COMMENT SHEET**

**Saddle Road Project**

Public Hearing  
December 11/13, 1997

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below for you to make your comments. Please hand in your statement during this meeting. Comments will be included in the address printed below. Although comments are welcome throughout the project development process, we would like to receive your initial comments by December 22, 1997.

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

COMMENT OR STATEMENT

- 24 Serious consideration should be given to shutting down the Pohakuloa military training area. It is a hazard no matter where the Saddle Road is located. It is a blight on our sacred mountains which should be used to foster peace, not train for war.
- 25 Question that needs to be addressed: How will various saddle Rd proposals affect Hawaiian Home Land? Preserving traditional trails in the area? Will the Saddle Road proposal provide access to the Umi Pepee Temple heiau in the area?

Notice: Copies of all comments provided are available to the public under the Freedom of Information Act. This will include names, addresses, and any other personal information provided with the comments. Your comments will be considered with or without the following optional information (please print):

Name Jim Albertini  
 Address P.O. Box AB 'Ola'a, Hawaii 96760  
 Representing Malu'Aina Center For Non-Violent Education + Action

Mailing address: Federal Highway Administration, Central Federal Lands Highway Division, 555 Zang Street - Room 259, Lakewood, Colorado 80228 (Attention: Bert McCauley, HPD-16, Saddle Road)

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Ronald E. Bachman  
85 Kalo Street  
Hilo, HI 96720  
(808) 959-8852

RECEIVED  
DEC 13 1997

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Hawaii Dept. Of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813

ATTENTION: Mr. Kazu Hayashida

Dear Sir,

I intend to testify along the following lines regarding the draft environmental impact statement for Saddle Road. These comments represent my personal viewpoint.

- 28 Saddle Road project DEIS is generally acceptable. My comments are focused on SECTION II where I believe route EX-2, the existing route, should be chosen for the following reasons:
- 29 1. The paliia mitigation is excessive compensation for the incursion of PTA-1 or PTA-3 into paliia critical habitat. The expense and intrusion inflicted by taking lands from functioning ranches and the much needed training area is hardly justifiable. Such excessive cost could serve to discourage funding the entire Saddle Road project.
- 30 2. The Army has prepared an Ecosystem Management Plan, PTA and Endangered Species Management Plan for Pohakuloa Training Area. Both plans identify the lands east of Mauna Kea State Park as "Sensitive Ecological Area" and "Biological Significant Area." Resultant training guidelines limit military activities in this place. Roadway realignment to accommodate expanded training activities is not a realistic persuasion.
- 31 3. Game bird and mammal hunting are both conducted where PTA-1 or PTA-3 would traverse. The disruption to wildlife and resultant lost acreage is unacceptable. This is an important hunting area because it is easily accessible without 4 wheel drive, it is next to the Mauna Kea State Park so it offers a pleasant recreational package and the habitat is good for raising game.
- 32 4. Fire is identified as the single greatest threat to critical paliia habitat. Both PTA-1 and PTA-3 offer the greatest fire threat. The existing route EX-2 is mostly on a lava flow. The threat of wild fire is therefore greatly reduced.
- 33
- 34

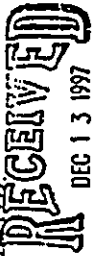
PUBLIC COMMENT SHEET

Saddle Road Project

Public Hearing

December 11/13, 1997

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below to write out any comment you may wish to make. Please hand in your statement during this meeting or, if you prefer, mail to the address printed below. Although comments are welcome throughout the project development process, we would like to receive your initial comments by December 27, 1997.



COMMENT OR STATEMENT OKAHARA & ASSOC., INC. KAILUA-KONA OFFICE

- 35. I have been involved in the Saddle Road project for about four years now in a working capacity. The following is my personal opinion: I believe that not rebuilding the road is a hazard to people traveling on it. I hope those in charge will continue, however, to take all vents into consideration in order to proceed in the most judicious manner possible.

Notice: Copies of all comments provided are available to the public under the Freedom of Information Act. This will include names, addresses, and any other personal information provided with the comment. Your comments will be considered with or without the following optional information (please print):

Name: Liz Barton  
Address: P.O. Box 754, Keolu, HI 96749  
Representing: Self

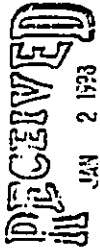
Mailing address: Federal Highway Administration, Central Federal Lands Highway Division, 555 Zang Street - Room 259, Lakewood, Colorado 80228 (Attention: Bert McCauley, HPD-16, Saddle Road)

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13039595903 P.O.I

IU

Lou Ann Barton  
P. O. Box 697 Kamuela, HI 96743  
808/885-8432 808/885-0657(Fax)



OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

December 18, 1997

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Denver, CO 80228

Re: Hawaii Island, Saddle Road Project, Section 1

Dear Mr. McCauley:

I am a lot owner in the Waikiki Ranch development, the only residential community along the proposed W-2 or W-3 alignments in Section 1 of the Saddle Road Project.

- 1. I do not support the proposed W-2 alignment because of its proximity (only 400 yards) to the western border of the Ranch. The noise and lights generated by 14,000 cars per day passing so close to the Ranch would be very disruptive to this very peaceful and tranquil site.
- 2.
- 3.
- 4, 6.

We are already battling foreign weeds in an attempt to maintain the quality of grazing land for our livestock. The introduction of more foreign weeds and grasses from the westness of this volume of traffic and human activity may make that fight impossible to win, threatening the fundamental activity of the Ranch.

Please do not choose the W-2 alignment.

Sincerely,

*Lou Ann Barton*

Lou Ann Barton

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ROBERT E. BETHEA  
699 KNOOLE STREET, SUITE 210  
HILO, HAWAII 96720

December 9, 1997

RECEIVED  
DEC 11 1997

Federal Highways Administration  
555 Zang Street  
Lakewood, Colorado 80228

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Re: SADDLE ROAD ENVIRONMENTAL IMPACT  
STATEMENT PUBLIC HEARINGS - December 11/13,  
1997

Gentlemen:

My name is Robert E. Bethea and I am a practicing attorney on the island of Hawaii. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road. In my opinion this document addresses reasonable community concerns.

I believe the road will be heavily traveled, particularly by passenger vehicles and light trucks. It will bring the people of East and West Hawaii together.

All of us will receive benefits direct and indirect from a project of this scope. We are most encouraged at the findings and mitigation plans. I recommend expedited support for this important project.

Thank you for the opportunity to submit these comments.

Very truly yours,

Robert E. Bethea

REB/aa  
bcc: Paula Helfrich (Faxed to 966-6792)

DR. BILLY BURGIN

62-2279-B Kanehoa Drive,  
Kamuela, Hawaii 96743  
Dispensary, (808) 885-5598  
Regulatory Office (808) 885-4454  
Residence (808) 885-4466

December 8, 1997

RECEIVED  
JAN 2 1998

Federal Highway Administration  
555 Zang Street  
Lakewood, Colorado 80028

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

ATTENTION: HPD-16E, Saddle Road

Dear Sirs:

As a lifelong resident of the Big Island and user of the Saddle Road since 1952, I want to commend project personnel on the thorough study of all issues of Sections I through IV of the Saddle Road Improvement Project.

For practical reasons I strongly endorse W-2 as the route of choice I will be away during the December 11 and 13, 1997 meetings and wish to convey my feelings via this memo.

Again, congratulations on the thoroughness of the draft environmental impact statement.

Sincerely,

William C. Burgin, DVM

RECEIVED AS FOLLOWS

David L. Bigelow  
P.O. Box 415  
Kamuela, HI 96743  
Phone: (808) 885-9004

December 17, 1997

FIHWA (HPD-16)  
555 Zang Street, Room 259  
Lakewood, CO 80228

Attn: Mr. Larry C. Smith, Division Engineer

Dear Mr. Smith:

This letter contains my comments regarding Section 1 of the Hawaii Saddle Road realignment project. I am a resident of Waiki'i Ranch, a gated community of large ranch lots.

I am opposed to the W-2 alignment of the proposed Saddle Road because of noise and light pollution. The location of a portion of W-2 directly downhill from my home (and others) will subject us to highway noise 24 hours a day, plus the headlights from night-time traffic will shine directly into our homes.

I spent considerable time and money locating into this community, because of its strict noise and light restrictions. The W-2 alignment will effectively destroy the peaceful and quiet environment that prompted us to build our home here. There will also be a substantial negative economic impact on the value of my property and home.

Table S.6 of the executive summary of the draft environmental impact statement is flawed, inaccurate, and incomplete. It fails to address the concerns mentioned in paragraphs two and three (above) in the Social, Economic, and Noise sections. Please see the attached specific comments regarding Table S.6

I am in favor of the overall project, but do believe that it is not necessary to construct the road in a manner that will produce such an undesirable impact to the only community along the proposed route. If W-2 is the route of choice, I will organize a legal challenge of the project for the reasons given in paragraph four (4) above.

Sincerely,  
*David Bigelow*

David L. Bigelow

Enclosure: Table S.6 comments

cc: Senator Daniel K. Inouye, Waiki'i Ranch Homeowners' Association

EXTRACT FROM  
S.6

<b>Social</b>	<b>W-2, W-3:</b> Improvement in traffic flow and access to area. Reduction in traffic volumes within Waiki'i. No disproportionate impact to disadvantaged groups. No impacts to native Hawaiian cultural resources.
<b>W-2:</b> Increase in traffic volumes on Waikoloa Rd.	<b>No Action:</b> No improvement in accessibility of recreational resources. No disproportionate impact to disadvantaged groups. Increasing congestion on alternative route (SR 19).
<b>Economic</b>	<b>W-2, W-3:</b> Generation of direct and indirect employment from construction activities. Decrease in cross-island travel time and associated increase in monetary savings. Improvements to safety and associated savings on accident costs.
<b>No Action:</b> No generation of direct or indirect employment from construction. No decrease in cross-island travel time nor increase in monetary savings. No improvements to safety and traffic flow.	<b>Noise</b>
<b>W-2, W-3:</b> No exceedence or approach of Federal noise standards (NAC) nor substantial increase at any sensitive receptors.	Reduction in traffic noise in Waiki'i.
<b>No Action:</b> No exceedence or approach of NAC nor substantial increase at any sensitive receptors. Increase in traffic noise levels in Waiki'i as traffic levels grow.	

41 Traffic volume will not be reduced with W-2. It will only be shifted from one side of Waiki'i Ranch to the other. Present Saddle Road traffic is screened by tree lines, and headlights at night are not a factor. The location of W-2 downhill from Waiki'i Ranch will increase the noise level from traffic.

42 Waiki'i Ranch is a master planned community with strict noise and light restrictions. The W-2 alignment will have a negative social impact on the community.

5 Waiki'i Ranch property values will be adversely affected by the W-2 alignment.

44 W-2 will not exceed Federal noise standards, however it will cause a substantial audible impact on Waiki'i Ranch, which is master planned to have very low noise levels.

42 Traffic noise in Waiki'i will be increased with W-2, because of the location downhill from the community.

RECEIVED AS FOLLOWS

PHIL BRUCE  
P.O. BOX 303527  
WAIKOLOA, HI 96738

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DEC 11 1997

FEDERAL HIGHWAYS ADMINISTRATION  
555 ZANG ST. ROOM 259  
LAKEWOOD, CO 82007

OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

I don't think that anyone else in Waikoloa will write you about  
problem, I hope they do for there sake.

Waikoloa is a town of about 5000 people and growing at a good  
rate, by the time this road is completed population will be  
six or seven thousand.

Waikoloa is located on Waikoloa Road that inter sects HIGHWAY  
190 some time called the upper or belt road but real name is  
MAMALAHOA HIGHWAY, and the lower road HIGHWAY 19,  
named KA 'AHUHANU HIGHWAY.

Waikoloa main street is PANIULO STREET, and crosses WAIKOLOA  
ROAD, at present there are stop signs on either side of Waikoloa  
Road on Paniolo Street, there have been several accidents at  
this intersection over the years but no deaths, we as a town  
have urged the county of Hawaii for a signal, but no luck they  
we must have more accidents and a death or two before they will  
conduct a study of need!

We feel that when the new SADDLE ROAD is opened it will be  
45 putting such a large number of traffic on Waikoloa Road, that  
a signal is a must, county or no county. we feel it must be  
addressed as part of the SADDLE ROAD IMPROVEMENT.

When making these plans include the Waikoloa Road, Paniolo Street  
intersection traffic signal must be included.

"ALOHA"

PHIL BRUCE

C. BREWER AND COMPANY, LIMITED  
P.O. BOX 1112 / HONOLULU, HAWAII 96810  
(808) 531-4700 / FAX (808) 531-4817

J. W. A. BUYERS  
Chairman  
Chief Executive Officer

December 12, 1997

Federal Highways Administration  
555 Zang Street  
Lakewood, CO 80228

RE: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARINGS - December 11/13, 1997

Gentlemen:

My name is J. W. A. Buyers and I am the Chairman and Chief Executive Officer of C. Brewer  
and Company, Limited. I have reviewed the Executive Summary of the Draft Environmental  
Impact Statement for the Saddle Road, and believe that the document addresses all possible  
community concerns and technical information.

36

46 This Saddle Road has been delayed entirely too long and it will be of tremendous benefit to the  
economy of the Big Island. It will not only provide a great number of needed construction jobs,  
but it will also link the east and west side of the Big Island with great transportation benefits to  
workers and all the citizens of the County of Hawaii. I urge you to move this important matter  
forward with the greatest of speed if you have any compassion for the high unemployment rate  
which prevails on the Big Island.

Citizens of the Big Island -- both corporate and the community at large -- will benefit from a  
project of this scope. We are most encouraged with the DEIS findings and mitigation plans, and  
urge expedited support for this important project.

Thank you for the opportunity to submit these comments.

Sincerely,

*J. W. A. Buyers*  
J. W. A. Buyers

Chairman and Chief Executive Officer

JWAB:d

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JAN 5 1998

OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

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# Facsimile Cover Sheet

*Bert McCauley*

To: Mr. Lamy C. Smith, Div. Engf.

Company: FHWA (HPD-16), USDOT  
Phone:  
Fax: (303) 969-5989 03

From: Gary N. Cadwallader  
Company: Waikiki Ranch Community  
Phone: (808) 885-7401  
Fax: (808) 885-5988

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JAN 2 1998

OKAHARA & ASSOC., INC.  
KAILUA-KUNA OFFICE

Date: 12/18/97 04:54 AM

Pages including this cover page: 3

Mr. Smith: TESTIMONY AND COMMENTS REGARDING THE W-2 ALIGNMENT OPTION OF THE SADDLE ROAD REALIGNMENT PROJECT.

## PUBLIC COMMENT SHEET Saddle Road Project

Public Hearing  
December 11/13, 1997

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below to write out any comment you may wish to make. Please hand in your statement during this meeting or, if you prefer, mail to the address printed below. Although comments are welcome throughout the project development process, we would like to receive your initial comments by December 22, 1997.

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JAN 2 1998

COMMENTOR STATEMENT  
OKAHARA & ASSOC., INC.  
KAILUA-KUNA OFFICE

- 47 I agree with the Saddle Road realignment but I cannot agree with PTA- 1 or the mitigation for the palila. The military says that safety is their concern but they have never had
- 48 problems shooting over Saddle Road before. There has never any incident or close incidences because of shooting over Saddle Road. As far as vehicular traffic, that should be part of the training. In a real war situation, the military will also have to contend with civilian traffic. As far as the mitigation, I think the whole thing is a farce.
- 49 There are no palila in the critical habitat in the area of the realignment so why should there be any mitigation. What is amounts to is that they want to shut the highway off nothing.
- 50 Besides, USFWS are the poorest keepers of any land. The Palila Critical Habitat is a fire waiting to happen. Notice: Copies of all comments provided are available to the public under the Freedom of Information Act. This will include names, addresses, and any other personal information provided with the comments. Your comments will be considered with or without the following optional information (please print):  
Name: Mr. Cadwallader  
Address: 438-A Waiwaka Ave., Hilo, HI, 96720  
Representing: \_\_\_\_\_

Mailing address: Federal Highway Administration, Central Federal Lands Highway Division, 555 Zang Street - Room 259, Lakewood, Colorado 80228 (Attention: Bert McCauley, HPD-16, Saddle Road)



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Gary N. Cadwallader,  
POB 906  
Kamuela, Hi. 96743  
PH: (808) 885-7401  
FAX: (808) 885-5988

Gary N. Cadwallader  
POB 906  
Kamuela, Hi. 96743  
PH: (808) 885-7401

Mr. Larry C. Smith, Division Engineer  
FHWA (HPD-16)  
555 Zang Street, Room 259  
Lakewood, CO 80288

TRANSMITTED BY FACSIMILE TO (303) 969-5908

TESTIMONY AND INPUT: SADDLE ROAD REALIGNMENT: ISLAND OF HAWAII

December 18, 1997

Dear Mr. Smith:

I am a homeowner and resident of Waikii Ranch, a gated, master planned community of Ranch lots which abuts the Saddle Road.

- 1) I support a modern cross island route between Hilo and West Hawaii.
- 2) I do not oppose an alignment which matches up with Waikoloa Road.
- 3) I do strongly oppose the currently drawn W-2 alignment because that alignment is too close to the planned community of Waikii Ranch.
  - The 1300' proximity combined with your estimates of 14,000 autos per day make this alignment of significant damage to the residents and lot owners of Waikii Ranch.
- 4, 6, 51 • Noise pollution, light pollution, and auto emissions will negatively impact a rural planned community which has strict noise and light controls.
- 5 • This alignment will negatively impact property values.
- Please provide evidence that the EIS has considered this community's interests.
- If most community interests are pressing for the road alignment to "attach" to the top of Waikoloa Rd., why was the W-2 alignment not more direct to that point rather than swinging north & east to the close proximity of Waikii Ranch?

52 • I strongly recommend a rerouting of the W-2 option in order to avoid Waikii Ranch. This compromise will better balance the needs and interests of the various communities and reduce the likelihood of litigation.

1 2 4) I oppose the dead-ending of the existing Saddle Road (SH 200) near mile post 42.

• Several in the Waikii Community depend on this route to commute to jobs in Hilo. I personally commute 5-6 days per week to Hilo via SH200. Dead ending would force impractical routes to Hilo from the Waikii community.

• Waikii depends on the Pohakuloa Fire Dept. as a secondary response unit to fires. While PFD has no contractual responsibility to provide assistance, in the past they have been the first responder to fires; arriving earlier than the Waimea FD. Further, PFD has asked from time to time that Waikii Ranch serve as a backup source of water in the event of fire emergencies at Pohakuloa. Dead ending the existing SH 200 at mile post 42 would cut off all practical vehicle contact between the two locations.

52

• There are several options short of dead-ending that would help confine the traffic on SH200 from M.P. 42 - Mamalahoa Hwy to low volume use. As well, the practical matter is that Hilo >> Waimea and return Hilo >> Waikoloa & Hotels & Kawaihoo & Kona would use the W-2/3 alignment. Thus users would be confined to "focal traffic".

1 3

Sincerely,



Gary N. Cadwallader

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Mr. Abraham Y. Wong  
December 17, 1997  
Page 2

RECEIVED:  
DEC 19 1997  
HONOLULU

December 17, 1997

Mr. Abraham Wong  
FIHWA  
Box 50206  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850

Re: Saddle Road Draft EIS

Dear Mr. Wong:

This letter is written in support of the proposed construction of the Saddle Road. We have had an opportunity to review the Draft EIS, the Saddle Road Project Bulletin and to participate in public forums relating to this project. In our opinion, this road is needed to facilitate cross island as well as military transportation.

The present Saddle Road has served a purpose. However it has proven to be unsafe and hazardous in many sections. It is also badly in need of repair. Establishing a new route and completely rebuilding the Road seems to be the best long term solution.

We recognize the impact of a project of this nature on the surrounding environment and community. However, anticipated negative impacts can be mitigated in a reasonable and responsible manner as indicated in the Saddle Road Project Bulletin. The benefits are clearly micronutious.

Our support is for the project in general for the stated reasons. It should be understood that both routes W-2 and W-3 pass through lands owned by Parker Ranch. It is our opinion at this time that either of the two is acceptable.

Thank you for the opportunity to present this testimony.

Sincerely yours,

Carl A. Carlson Jr.  
Trustee

cc: Trustees

December 13, 1997

U. S. DOT, FHWA  
Box 50206  
300 Ala Moana Blvd.  
Honolulu, HI 96850

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DEC 13 1997

OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

Subject: Saddle Road Public Hearing, UHH, Hilo, Hawaii

Dear Sirs;

36 My name is Dante K. Carpenter. I am a director of Pacific Waste, Inc., a waste disposal company, with operations in Hilo and Kawaihae serving the island of Hawaii. I am pleased to offer testimony in support of this project and comments regarding the DEIS for the Saddle Road (State Route 200) County of Hawaii, State of Hawaii, FHWA project No. A-AD-(6).

Let me state at the outset that neither General Bagnal, then Commander of USARPAC, nor I, in a prior role as Mayor of the County of Hawaii in 1985, ever imagined that the Big Island's Saddle Road project would be listed on the World Wide Web at [www.sadleroad.com](http://www.sadleroad.com). Indeed, I never knew what the world wide web was or that I could download several issues of newsletters promulgated by a citizen's Saddle Road Task Force formed in 1993 by Senator Inouye, and further print out a 34-page executive summary document describing in clear terms the project under discussion today. I appreciate the openness of these proceedings.

Our mutual pledge then was to immediately attempt to stop the loss of both civilian and military lives, as well as injuries and equipment damage, due to extreme conditions on the Saddle Road, by implementing safety improvements while planning a long term solution for the mutual development and benefit of this vital roadway across the island.

54 I personally want to thank the good general for following up over these past 13 years with succeeding USARPAC commands to its present Commander LTG Steele so that this project can, indeed, be accomplished in our lifetime. It will, no doubt, increase the mobility of Hawaii's people as well as benefit user resident communities, including scientists, island commuters, hunters, cultural gatherers, military, commercial and visitors alike.

I know I was quite perturbed when the first approvals by the State Land Board were given for the county's early improvements in '86 and '87 from the 8 to 18 9 19

MP. They called for very strict working boundaries within limited and narrow right-of-ways so as not to invite alien species of flora and fauna, etc. That slowed the work processes because it limited the ability of heavy equipment to maneuver in tight places. But, I now have a greater appreciation for the sensitivity of the Saddle Road area as it relates to native habitat for creatures large and small such as snails, insect species as well as endangered endemic bird species.

The DEIS identifies important environmental, biological, social, economic concerns, among others, and summarizes the impacts as they relate to the various segments proposed for improvement. Actions to mitigate concerns appear to resolve to my satisfaction most, if not all, potential conflicts.

Therefore, in the interests of separation from military activity, environment, and cost effectiveness for the distances involved, I would recommend W-2 in Section I, PTA-1 in Section II, EX-3 in Section III, and a reexamination in Section IV to allow for an E-3 segment to tie into the original proposed cross-island extension of Puainako Avenue at the Komohana Highway junction mauka of the city of Hilo.

55 Further, may I strongly suggest that, in conjunction with the road improvements, there are installed adequate roadside turnouts for viewpoints, rest stops, cultural gathering, hunter stations, etc. Moreover, in consideration of the long term future, that potential high-speed transit corridors be identified from east to west and north to south to augment existing as well as future road alignments in conjunction with the cross-island arterial-Saddle Road.

56 May I again express a sincere mahalo to the many agencies of federal, state and county governments, as well as community advisors who are participating in this much needed project. Moreover, Rust Environment & Infrastructure Co. should be commended for developing a comprehensive set of route location design studies necessary for the project as well as selecting Okahara & Associates, a competent local Hilo-based firm, for all project coordination in Hawaii.

Needless to say, Pacific Waste, Inc. looks forward to utilization of the improved Saddle Road as an integral part of its operations in hauling disposable wastes to the landfill site in West Hawaii. We strongly support this project. Mahalo a nui loa for your consideration.

Dante K. Carpenter, CEO  
Pacific Waste, Inc.  
P. O. Box 44503  
Kawaihae, HI 96743  
*Dante K. Carpenter*  
12/13/97

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**QUESTION CARD RECEIVED**  
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 OKAHARA & ASSOC., INC.  
 KAILUA-KONA OFFICE

**Public Hearing**  
 Saddle Road Project

NAME: Harvey T. C. Law

ADDRESS: P.O. Box 158, Kaneohe, HI 96744

REPRESENTING: Wildlife Conservation Dept. of HI

QUESTION: Will the bird area habitat be restored?  
Palila Habitat.

**PUBLIC COMMENT SHEET**  
 Saddle Road Project

Public Hearing  
 December 11/13, 1997

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below to write out any comment you may wish to make. Please hand in your statement during this meeting. **RECEIVED** address printed below. Although comments are welcome throughout the project development process, we would like to receive your initial comments by December 31, 1997.

OKAHARA & ASSOC., INC.  
 KAILUA-KONA OFFICE

**COMMENT OR STATEMENT**

Palila mitigation, for what. Dr. Charles Van Riper III states in his studies that the Palila lives above 6,700 feet elevation. That is well above the critical habitat in training areas 1-4. No one has ever found any palila in that area of the critical habitat. In 1996, someone thought they heard a palila so a lot of people were moved into that area to find the bird all for naught.

Dr. Andrew Berger, one of the original members of the palila recovery team says that the critical habitat in training areas 1-4 was designed to prevent the sheep from feeding on the mamms. He goes on to say that the palila have been found in the areas 1-4 which is the mitigation for them. They just want the land.

Notice: Copies of all comments provided are available to the public under the Freedom of Information Act. This will include names, addresses, and any other personal information provided with the comments. Your comments will be considered with or without the following optional information (please print):

Name: HARVEY T. C. LAW  
 Address: 932 Kamehaha Dr., Alii, HI 96720

Representing \_\_\_\_\_

Mailing address: Federal Highway Administration, Central Federal Lands Highway Division, 555 Zane Street - Room 259, Lakewood, Colorado 80228 (Attention: Bert McCamley, HPD-16, Saddle Road)



62 make them all special or sacred. The word "sacred" is thrown around far too carelessly in Hawaii's political climate of today, and the words "sacred mamane forest" do not belong in the DEIS. (See the last statement of "Socio-Economic Mitigation/Benefits" in the DEIS, which is a blatant abuse of the terms "sacred" and "forest" to explain a vastly disproportionate exchange of land)

63 3. My information has been that the court-enforced near extermination of the wild sheep on Mauna Kea has not changed the "critical paha habitat" in a significantly positive way, at least insofar as an increase in paha birds. Meanwhile, I can state from personal observation that there has been a great increase in a vine pest covering the mamane trees, and in grass and ground level branches and debris that promote truly deadly fire damage. Thus, much of the DEIS may be based on a false premise—that saving mamane habitat will increase the endangered paha birds.

64 4. The least observant person can see that the so-called "critical paha habitat" of mamane trees would extend far into Kahohe lease on the west of Section II, and the Humuula Sheep station lands on the east of it, if cattle were not there. There are virtually no new mamane trees in the former, and none in the latter, whereas there are many returning in the areas in between from which horses and cattle have been excluded for some time, yet which still contain a modest number of sheep and a large number of pigs. Making strong points in the DEIS about the effect on 100 acres or so of shrubland or open woody areas in Section II by the proposed new roadway is like spitting in the ocean compared to the loss of mamane habitat caused by these grazing areas. Just take one look on either side of the fence dividing Kahohe Horse Pasture area from Kahohe lease on the west or PTA Unit I from Humuula grazing lands on the east. This problem should be addressed directly with the State of Hawaii and the Department of Hawaiian Homelands, owners of these lands.

29 5. With #'s 1, 2, 3, and 4 above as "bottom lines", it is nothing short of purposeful distortion, and legalized fraud and extortion, to claim that 100 or 114 acres of very questionable "critical habitat" deserves an exchange of 9345 acres of other lands!

65 6. Fencing off "exchange" lands and eliminating all ungulates will not keep out the introduced plants because native and game birds readily spread their seeds, and it will disallow the soil-tilling effect of pigs, which give native trees and plants a chance to get a start in the packed ground and dense grasses of former ranching areas. Sheep and goats, likewise, have their place in diminishing vine overgrowth and fire danger. Population control, not eradication, is the answer.

66

67

68 7. Allowing no unshielded lighting on construction or maintenance equipment after dark between April and October is a ridiculous waste of time. I have never seen any evidence of "nesting shorebirds" in Sections I and II, nor can I imagine any in the dense shrublands/forest of Sections III and IV. Additionally, there are already numerous nighttime light sources on Mauna Kea and the Saddle.

69 8. Steam cleaning and fumigating the equipment is an utterly foolish and wasteful "ivory tower" proposal, when hunters, hikers, soldiers, state employees, astronomers and tourists have entered the numerous roads and trails of these areas for years with their boots, clothes and vehicles, and the areas already have a vast array of introduced plants and insects. I know—I've been there. The damage is long-since done, and the wind and birds are as much a factor as human activity.

70 9. The proposal that more lands would be available to hunters is utterly unsubstantiated in the DEIS, and historical fact would point to exactly the opposite. In fenced "critical habitat" exchange lands, who would monitor hunters and let them in and out? There is no provision, no plan, and no funding. Do you expect hunters, hikers, naturalists and birdwatchers to believe that those with such idealistic proposals as those in #7 and #8 would allow "ordinary" people access to "exchange" areas, once they were fenced?

B. Ka'imiloa Chrisman M.D.  
Bruce B. Ka'imiloa Chrisman, M.D.



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OPTIONAL FORM NO. 10  
MAY 1962 EDITION  
GSA FPMR (41 CFR) 101-11.6

12/18/97

FAX TRANSMITTAL

To: *Bob McLaughlin*

From: *Glenn*

7:03:06 - 5:03

808541-2704

GENERAL SERVICES ADMINISTRATION

P.O. Box 6894  
Kamuela, HI 96743  
tel. 808-885-2777  
email. asjdore@hawaii.net  
Dr. John E. Dore

16 December 1997

Mr. Abraham Y. Wong  
Division Administrator  
Federal Highway Administration  
Box 50206  
500 Ala Moana Blvd.  
Honolulu, HI 96850

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OKAHANA & ASSOC., INC.  
KAILUA-KONA OFFICE

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DEC 10 1997  
BUSINESS CENTER

Dear Mr. Wong,

I am writing in regard to the Saddle Road Project proposed for the island of Hawaii. I have carefully studied the Project Bulletin and the Executive Summary of the Draft Environmental Impact Statement (DEIS), and have attended a public hearing on this project in Waikoloa on 11 December. After considering all the information provided, I can see no compelling reason for the public to invest their tax dollars in this project. It is my opinion that the drawbacks of such a project have been grossly understated and that the potential benefits have been largely fabricated by those who stand to gain from realigning the Saddle Road (namely, the military and the construction industry). The proposed Saddle Road Project is a bad idea.

The stated purpose of the proposed project is to address five areas of public concern: (1) existing roadway deficiencies, (2) conflicts with military operations and associated hazards, (3) inadequate traffic carrying capacity, (4) motorist safety problems, and (5) social demand and economic development. I will address each of these points in turn.

(1) Roadway Deficiencies

There is no question that the existing Saddle Road suffers from degraded pavement and poorly aligned corners. However, many roads on Hawaii island and in the State of Hawaii are in need of repairs. Which should be improved first, and to what degree? The proposed project has a huge (>\$200 million) price tag, yet the Saddle Road is only traversed by 900 automobiles per day. Many of these drivers, particularly the scientists and technicians serving the telescopes at Mauna Kea, only traverse half the road on a given day; many others are tourists, not residents. The population of Hawaii island is >130,000, therefore less than 1% of the residents of

71

DIANE DE LUZ  
P.O. BOX 412  
PAAUULO, HAWAII 96776

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DEC 11 1997

OKAHANA & ASSOC., INC.  
KAILUA-KONA OFFICE

December 11, 1997

Federal Highways Administration  
555 Zang Street  
Lakewood, Colorado 80228

Re: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARINGS - December 11/13, 1997

Gentlemen:

My name is Diane De Luz and I am a resident of the Big Island of Hawaii for 34 years. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, and believe that the document addresses all possible community concerns and technical information.

36 My family and friends travel the Saddle Road to commute to Kona to go to work, shopping at Costco, K-Mart, Wal-Mart, and to attend church and family related activities. It would be great to have a road that will get us to Kona safer and within 2 hours.

The Saddle Road will be a benefit for all of the citizens of the Big Island.

Sincerely,

*Diane De Luz*  
Diane De Luz



71 the Big Island use the Saddle Road per day. It is quite clear to me that such a massive project on behalf of such a small fraction of the population is not warranted. If improvements need to be made to increase public safety, then upgrading of the existing road, with a considerably smaller expenditure, may be called for. However, the construction of new sections (PTA-1, PTA-3, W-2, W-3, E-3) should be low on the list of statewide highway improvement projects. In addition, scientists have identified a large portion of the Saddle Road as being within Volcanic Hazard Zone 2 (on a 1-9 scale). This is the same level of hazard as Kalapuna! It is not sensible to invest a huge amount of money into a highway that stands an excellent chance of being inundated by lava within our lifetimes.

72

73

(2) Conflicts/Hazards with Military Operations

The DEIS states that conflicts between the traveling public and military training exercises have "reduced the quality of many training maneuvers". However, there appears to be little or no concern voiced for the reduced quality of the natural experience often encountered by those who stay at Mauna Kea State Park when flares, explosions, gunfire and low-flying helicopters turn one of our quietest public areas into a scene reminiscent of "Apocalypse Now". Furthermore, the DEIS states that "some military operations require artillery to fire over Saddle Road". Exercise me, but how can anything "require" the lobbing of explosive shells over a public roadway? If the military cannot conduct training exercises according to their "requirements" in the existing PTA, then the answer is for them to change their requirements, not to bulldoze mauna forest so that they can fire their howitzers farther. Better yet, they should move their training exercises to an area that is sufficiently large to meet their "requirements", such as Nevada.

(3) Capacity

74 Saddle Road is a COUNTRY road, little-used by most (>99%) of Hawaii residents and used by few tourists as well. The DEIS projects that with the planned improvements, use will increase to 14,000 cars per day by 2014. Do we really want 14,000 cars each day, with the accompanying noise, litter, and inevitable breakdowns on the Saddle? Is a crowded, noisy freeway the future we want for this last great Hawaiian open space? I certainly do not wish to see this travesty occur. There has already been some discussion by our government of closing the Mauna Kea road to the public because of overuse. It seems certain that the large increase in traffic brought about by road expansion will also increase the number of cars on the Mauna Kea and Mauna Loa roads, inevitably forcing restricted access to these premiere recreational areas. Let us keep the Saddle county.

(4) Safety

75 The Saddle Road has its safety problems. However, the accident statistics presented in the DEIS are somewhat misleading. The DEIS claims that the accident rate per

million vehicle miles on the Saddle Road (5.43) is greater than the same rate on other rural two-lane highways in Hawaii (3.0), hence the Saddle Road is inherently more dangerous than other roads. How many rural two-lane roads in Hawaii typically require a transit of 53 miles? A typical transit on the Saddle Road covers a lot more vehicle miles than a typical transit on other such roads! Therefore the accident rate per transit is not so far above that for these other roads. The accident rate per million vehicle miles, a transit of 53 miles, and a usage rate of 900 cars per day, the accident rate works out to 1 accident every 3.9 days. As a daily commuter and frequent accident-viewer on the Queen Kaahumanu Highway, a rate of one accident every four days does not seem unusually high to me. Furthermore, I see no compelling evidence that the accident rate will decline with the proposed construction. If you have ever driven across the Saddle in one of its dense fogs, you must realize that increasing traffic speed to 50-60 mph can only lead to massive pile-ups like those commonly occurring on Interstate 5 in California. No amount of road improvement will eliminate the fog. Also, the vehicle breakdown rate must be considered. The Mamalahoa Highway only rises to about 2800 feet; the Saddle Road rises to over 6000 feet! If heavy traffic is to go over the Saddle daily, you can expect a lot of stranded motorists getting hypothermic with no planned facilities for aiding them.

(5) Social Demand and Economic Impact

81 The social and economic arguments for the proposed project presented in the DEIS are largely contrived. Yes, the economy of East Hawaii is in bad shape, but the answer to that problem lies in creating new and forward-looking industries in East Hawaii, not in creating a freeway for faster access to jobs in West Hawaii. I commute about one hour each way from Waimea to my work in Kona. I know that I am sometimes very tired on my way home. I sympathize with those people who commute two or more hours each way each day just to make a living. The proponents of this project in effect are suggesting that long commutes from East to West Hawaii should be encouraged - that is truly unsafe. SRI9 is only 7.5 miles longer than the Saddle Road route for Hilo-Kona commuters, and rises to less than half the elevation, hence little actual savings in drive time are to be gained by going over the Saddle. To suggest that "labor force mobility" will increase with the improvements proposed for the Saddle Road is merely a convenient way for our government to avoid the truly significant issue of economic development for East Hawaii, and instead to offer East Hawaiian workers the "convenience" of spending four hours on the road each day just to feed their families. Also, the construction jobs created for this project will be funded by tax dollars, not be an enhanced economy, and will only last as long as the project itself, just as in Roosevelt's New Deal. After the construction is over, the economy will remain as depressed as ever. I am truly saddened to realize that many on this island have been successfully duped by this trickery of smoke and mirrors.

RECEIVED AS FOLLOWS

Dear Mr. Smith.

Re: Saddle Road

87 Make it the shortest route to Kona!  
However, remember one thing! Nobody  
88 in This state knows how to build or  
design a road. Let them Move From  
Wrong.

*Lang J. S.*  
LANG J. S.  
1000 KALANANAKUHIWA DRIVE  
HONOLULU, HAWAII 96813

RECEIVED  
DEC 13 1997

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

In closing, I cannot help but draw analogy between the proposed Saddle Road Project and the recently completed H-3 project on Oahu. Both have been created out of nothingness by military interests with little honest intent of solving social and economic problems for the people of Hawaii. One has marred the beauty that was in Halawa and Haiku Valleys, the other proposes to mar the beauty that is the Mauna Kea-Mauna Loa Saddle. The H-3 was finished 20 years late at 20 times the projected budget. Will the Saddle Road be finished in 2027 at a cost of \$4 billion?

Sincerely,

*John E. Dore*

Dr. John E. Dore

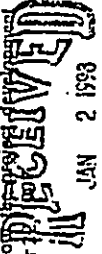
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**PUBLIC COMMENT SHEET**

**Saddle Road Project**

Public Hearing  
December 11/13, 1997

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below to write out any comment you may wish to make. Please hand in your statement during this meeting or, if you prefer, mail to the address printed below. Although comments are welcome throughout the development process, we would like to receive your initial comments by December 11, 1997.



OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

**COMMENTOR STATEMENT**

The Palila does not live below 6,700 feet elevation.  
The Saddle Road realignment is way below that height. Also the experts say that the Palila doesn't nest in the Pohakuloa Flats, so why should there be any mitigation.  
The 100 to one mitigation package is absolutely ridiculous. Furthermore, why should the mitigation package include areas where there are no palila.

29

28

I support EX - 2 because according to the Ecosystem management plan the military is not suppose to train in the area. The area is also biologically significant with a lot of endangered plants and birds. It is best NOT to disturb the area and keep the road where it is. Besides if you keep the road where it is, there shouldn't be any mitigation, thereby saving millions.  
Notice: Copies of all comments provided are available to the public under the Freedom of Information Act. This will include names, addresses, and any other personal information provided with the comments. Your comments will be considered with or without the following optional information (please print):

Name: LESLIE FUKUDA  
Address: 25-229 Wai Nani St. Hilo, HI 96720  
Representing: \_\_\_\_\_

Mailing address: Federal Highway Administration, Central Federal Lands Highway Division, 555 Zang Street, Room 259, Lakewood, Colorado 80228 (Attention: Bert McCauley, HPD-16, Saddle Road)

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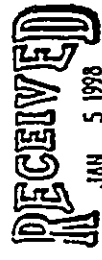
**Japanese Chamber of Commerce & Industry of Hawaii**

December 12, 1997  
Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Denver, Colorado 80228

**RE: COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT  
SADDLE ROAD (STATE ROUTE 200), ISLAND OF HAWAII**

Dear Mr. McCauley:  
On behalf of the Japanese Chamber of Commerce and Industry of Hawaii we would like to provide the following comments on the Saddle Road (State Route 200) Draft Environmental Impact Statement (DEIS). Initially, we would like to commend the Federal Highways Administration (FHWA) and its consultants for their outstanding job done in soliciting community participation, and for their exemplary effort in providing timely information to the community regarding the project and its potential impacts.

- 1 The Draft EIS, in Section 3.4.1 and 3.4.2, notes that the project will have multiple benefits to our island economy including:
  - 36 • Reducing the commute time for a significant number of East Hawaii residents who are employed in West Hawaii.
  - 90 • Helping to stimulate the island economy through the addition of approximately 456 full time equivalent jobs during the construction period and generating a total income of \$14 to 15 million dollars during that time.
  - 89 • Benefiting tourist who are traveling between East and West Hawaii by decreasing cross island travel times.



Waialea Villas • 400 Hualalai Street, Suite 202 • Hilo, Hawaii 96720  
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Read 12/14/97

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JAN 2 1998

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KAILUA-KOHA OFFICE

Address until 2 January 1998:  
6530 Cornvill Court  
Rashville, TN 37025

Address after 4 Jan. 1998:  
101 Aupuni Street #911  
Hilo, HI 96720

8 December 1997

Federal Highway Administration  
555 Zang Street (Room 259)  
Lakewood, CO 80228

re: HPD-16, Saddle Road

Dear Administrators:

The following is submitted to become part of the official public record on the Draft Environmental Impact Statement on Improvement of Hawaii State Route 200, Saddle Road from SR 200 to Milepost 6.

Since providing input during development of this DEIS, I have retired as Chairman of the Hawaii Speleological Survey. Therefore the following response is as a private individual.

In my opinion, the sections dealing with speleological resources are mostly well-reasoned. However, some inconsistencies exist and some wording reveals a lack of understanding of vulcanospeleological processes. The following should be improved or corrected in the final EIS:

- 91 1) Off page BB-1, I am unable to identify the reference "Halliday Saddle Road Hawaii Speleological...." and ask that this be clarified
- 92 2) In section 3.12.1.5 (Speleological Resources) the first sentence is confused and should be simplified to read:  
Speleological resources, such as lava tube caves and pseudokarst, occur within the project vicinity.
- 93 The last sentence should include the key phrase:  
too small.
- 94 3) On page S-11, 5th full paragraph, second sentence should begin:  
The topography is pseudokarstic, and....
- 95 4) On page 3-106, section 3.10.1 paragraph 2, sentence 2 should begin:  
The topography is pseudokarstic, and....

The economic importance of this last point should not be overlooked. Currently, as it is pointed out in the DEIS, tourist with rental cars are discouraged from driving on the Saddle Road. One of the Island's foremost attractions, the Onizuka Center for International Astronomy, is located on Mauna Kea and accessed from the Saddle Road, and the shortening of driving times between East and West Hawaii, that those visitors to West Hawaii will be more inclined to extend their length of stay to take advantage of this and other attractions in East Hawaii. This would be equally true for visitors arriving in East Hawaii. We encourage you, as part of your analysis within the EIS, to include an estimate of the potential economic benefits to the County that would result from the increase in tourism dollars spent at a result of the planned improvements to the Saddle Road.

The Draft EIS, within Section 3.4.2, points to the importance of the Saddle Road as a critical link for business travel, transport of goods and services, tourism, recreation, shopping and commuting. We note that the Saddle Road project will also have the social benefit of bringing East and West Hawaii that much closer together, helping to unify the social fabric of our Island.

We thank you for the opportunity to provide these comments. Many members of our Chamber currently use the Saddle Road to meet our islandwide business needs. We anxiously look forward to the funding construction and completion of the full project and the many benefits it will provide.

Sincerely,

  
Tom Goya, President

Japanese Chamber of Commerce and Industry of Hawaii

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**Big Island Business Council**

75-5137 KUAKINI HWY., #207  
KAILUA-KOHA, HAWAII 96740  
(808) 329-1758 • FAX: (808) 329-8364 Japanese Chamber of Commerce and Industry of Hawaii

Hawaii Hotel Association  
Hawaii Island Board of Realtors  
Hawaii Island Chamber of Commerce  
Hawaii Island Contractors Association  
Hawaii Island Economic Development Board  
Hawaii Island Portuguese Chamber of Commerce

Kona Board of Realtors  
Kohala Coast Resort Association  
Hawaii Island Restaurant Association  
Kona Kona Chamber of Commerce  
Kona Kona Industrial Area Association

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DEC 13 1997

FEDERAL HIGHWAYS ADMINISTRATION  
555 Zang Street  
Lakewood, Colorado 80228

OKAHARA & ASSOC., INC.  
KAILUA-KOHA OFFICE

re: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT  
Public Hearing  
Saturday December 13, 1997 - 10:00 AM

Gentlemen:

36

My name is Tony Hanley and I am the President of the Big Island Business Council. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, and it is my belief that the document addresses all possible community concerns and technical information.

The Big Island Business Council represents eleven business organizations with over 5,000 members from all sides of the County of Hawaii. The Council has been on record for the past fifteen years, in support of improving the saddle road into a major high-standard link between East and West Hawaii.

We believe that the findings and mitigation plans of the draft EIS address the critical issues involved with this proposed project and provide a tool to move forward.

I thank you for the opportunity to submit these comments. I am available for further discussion at any time.

J.A. Hanley  
President

5) On page 3-106, section 3.10.1 paragraph 5, the second sentence should be changed to read:

96 All of the drainages within the study corridor ultimately discharge to the ocean or to littoral springs through subsurface flow.

97 6) Section 3.12.2 omits a cave designated as 50-10-31-5003 in section 3.19.2. The final EIS should indicate whether this is one of the caves identified by name in section 3.12, and, if not, it should be included in section 3.12 (presuming that it is a cave as defined in the Federal Cave Resources Protection Act).

98 7) On page 3-128, just below the middle of the page the word Society should be changed to Survey.

Thank you for this opportunity to comment on this draft EIS.

Sincerely yours,

*William R. Halliday*  
William R. Halliday

cc: HSS(Medville)  
NSS(Jagnov)



HAWAII ISLAND PORTUGUESE CHAMBER OF COMMERCE  
P.O. BOX 1539 • H.L.O. HAWAII 96720

FEDERAL HIGHWAYS ADMINISTRATION  
555 Zang Street  
Lakewood, Colorado 80228

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DEC 13 1997

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

re: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT  
Public Hearing  
Saturday December 13, 1997 - 0900H

Gentlemen:

My name is Tony Hanley and I am the President of the Hawaii Island Portuguese Chamber of Commerce. I have been briefed on the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road and it is my belief that the document addresses all possible 36 community concerns and technical information.

The Hawaii Island Portuguese Chamber of Commerce promotes the economic well being of the people of Hawaii County as well as promoting commerce and industry throughout the Islands. We believe that improvement of the saddle road will provide an important economic link between East 99 and West Hawaii.

The Hawaii Island Portuguese Chamber of Commerce believes that the draft EIS addresses the issues and provides solutions to allow mitigation where necessary, and we urge expedited support for this important project.

Very truly yours,

Tony Hanley  
President

Thursday, December 11, 1997

Comments to: FHWA-FPHI-EIS-97-1-D  
Draft Environmental Impact Statement  
Saddle Road FHWA Project No. A-AD-6(1)

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DEC 11 1997

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KAILUA-KONA OFFICE

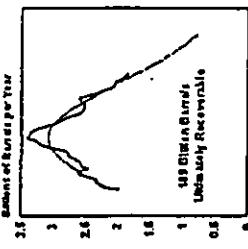
To whom it may concern:

I have a comment and two questions concerning expected traffic volumes on the Saddle Road. I am also including some references below each question for clarification.

**COMMENT:** On page 1-4 of the Draft EIS, you state that if all action alternatives are taken, the expected average daily traffic (ADT) is expected to be some 14,000 vehicles per day by the year 2014 (apparently based upon a 1994 study by Rust). I do not have a copy of Rust's study, but the estimate of 14,000 vehicles per day by the year 2014 is simply not credible.

**QUESTION #1:** What scenarios has the U.S. Department of Transportation developed for the expected "peak" in global oil production?

40 years ago, geologist M. King Hubbert developed a method for projecting future oil production and predicted that oil production in the lower-48 states would peak about 1970. This prediction has proved to be remarkably accurate. Both total and peak yields have risen slightly compared to Hubbert's original estimate, but the timing of the peak and the general downward trend of production were correct.



Oil production in the lower-48

(<http://www.wri.org/wri/ultimate/production.html>)

Global oil production will begin to "peak" when approximately half of the "Estimated Ultimately Recoverable" oil has been recovered.

"For many years geologists and oil companies have published estimates of the total amount of crude oil that will ultimately be recovered from the earth over all time. Remarkably, these assessments of Estimated Ultimately Recoverable (EUR) oil have varied little over the past half century." [Mackenzie, 1996. <http://www.wri.org/wri/ultimate/eur-oil.html>]

The exact date of the coming "peak" is unknown, but it could be soon as the year 2000.

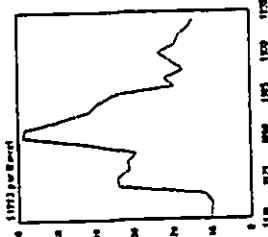
"Two important conclusions emerge from this discussion. First, if growth in world demand continues at a modest 2 percent per year, production could begin declining as soon as the year 2000. Second, even enormous (and unlikely) increases in EUR oil by the world title more than another decade (from 2007 to 2010). In short, unless growth in world oil demand is sharply lower than generally projected, world oil production will probably begin its long-term decline soon and certainly within the next two decades." [Mackenzie, 1996. <http://www.wri.org/wri/ultimate/eur-oil.html>]

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**QUESTION #2: Once global oil production "peaks", what are some probable scenarios concerning oil prices and the subsequent impacts on Hawaii's business community, and the Saddle Road ADT?**

In 1981, oil prices were more than triple today's \$18 per barrel. Obviously, it's just a matter of time until they triple again.



What will happen to tourism when the supply crunch comes, and global oil prices triple again? The global price of oil after the supply crunch should follow the simplest economic law of supply and demand. There will be a major increase in crude oil and all other fuels' prices, accompanied by global hyperinflation, rationing, etc. After the associated economic implosion, many of the world's developed societies may look like today's Russia. The United States may be competing with China for every tanker of oil, with the Persian Gulf oil exporters preferring Chinese rockets to American paper dollars for their oil. (THE FUTURIST, January/February, 1997, GET READY FOR ANOTHER OIL SHOCK!, by L. F. Ivanhoe <http://diseoff.org/page90.htm>)

The major external shocks that the Caribbean countries experienced over the past 25 years relate primarily to the adverse movements in their terms of trade due to the two oil shocks of the 1970s and one in the late 1980s. On average, each shock generated an adverse movement in the balance of payments equivalent to several points of GDP. (<http://www2.worldbank.org/oped/dumb.htm>)

Although the State of Hawaii has paid lip service to energy efficiency and alternate energy, the BLNR recently approved a new oil-fired power plant in Keahole (now tied-up in court). HECO is not financially exposed to increases in oil prices because they are allowed to pass increases straight through to customers. It seems hard to imagine how local businesses can survive if our already-sky-high utility bills when the price of oil triples!

When global oil prices triple - and gas costs \$5 per gallon - who will be able to afford to commute from Hilo to Waikaloa for a minimum-wage job?

Thank you

Jay Harrison  
78-7230 Puuopole Road  
Kailua-Kona, HI 96740

Attachments (2): THE COMING OIL CRISIS, by C. J. Campbell; Multi-Science Publishing Company & Petroconsultants, 1997; ISBN 0906522110

OIL AS A FINITE RESOURCE: When is Global Oil Production Likely to Peak? By James MacKenzie and World Resources Institute, 1996.

Page 3 of 3

"It is reluctantly concluded that there is strong evidence that the restricted Hubbert Curve for the world's total EUR of oil may first peak about the year 2000, Fig. 4, after which it may fluctuate along a horizontal production line (restricted by Saudi Arabia/OPEC) before inevitable decline..." (WORLD OIL, October 1995, FUTURE WORLD SUPPLIES, by L. F. Ivanhoe, <http://diseoff.org/page93.htm>)

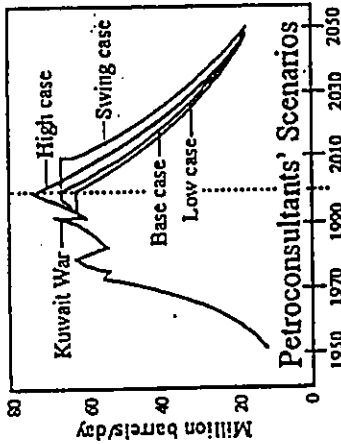
"At the time of writing in late 1996, there are still three more years to go until the end of the transition." (p. 59, THE COMING OIL CRISIS, by C. J. Campbell; Multi-Science Publishing Company & Petroconsultants, 1997; ISBN 0906522110, see attachment!)

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"A new report on world oil resources, World Oil Supply 1930-2050 (Campbell and Laberte, Petroconsultants Pty. Ltd., 1995), concludes that the planet's oil supplies will be exhausted much sooner than previously thought."

"The report, written for oil industry insiders and priced at \$32,000 per copy, concludes that world oil production and supply probably will peak as soon as the year 2000 and will decline to half the peak level by 2025. Large and permanent increases in oil prices are predicted after the year 2000." (EARTH ISLAND JOURNAL, Spring 1997, THE DEATH OF THE OIL ECONOMY, by Ted Trainer <http://diseoff.org/page116.htm>)



**CONCLUSION**

World oil consumption rose by 2.4 percent in 1996 to 69.55 million barrels a day (BP America, June 19, 1997). Thus, we seem to be on the Petroconsultants' high scenario, with OPEC output hitting an 18-year high of 27.39 mbpd in August of 1997 (Reuters, Sept. 7, 1997). It seems reasonable to assume that global production will soon be unable to keep up with surging worldwide demand, and that global oil production must peak by the year 2005.

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Page 2 of 3

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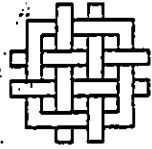
From JAY HANSON

# OIL AS A FINITE RESOURCE: WHEN IS GLOBAL PRODUCTION LIKELY TO PEAK?

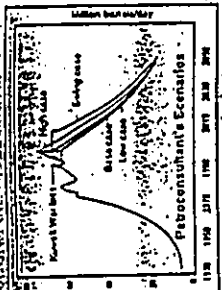
James J. MacKenzie

Book available at  
Okahara & Associates, Inc.  
Kailua - Kona

World Resources Institute  
March 1996



## Funding an Empty The Death of the Oil Economy



energy problem? There isn't one. Natural gas reserves are about as limited as petroleum, and gas use recently has been growing at a rate of 9 percent per year.

Relying on nuclear energy to provide 11 billion people with First World living standards would require a system of 250,000 giant breeder reactors using around 1 quadrillion tons of plutonium.

The tremendous amount of energy necessary to build fusion reactors (if they ever could work on a commercial scale) would guarantee a far worse greenhouse problem than what we face already. Even then, fusion power could supply perhaps only 20-30 years of energy for the world's 11 billion people.

There is no question that we should convert to renewable energy as quickly as possible, but even "clean" energy is not capable of bringing the system world-wide energy-intensive nations are using.

**Beyond 2005, the energy required to find and extract a barrel of oil will exceed the energy contained in the barrel.**

There is not enough plutonium to fuel the world's transport fleet. To supply 11 billion people with the number of cars used by people in rich countries would demand 10 times as much fuel as used today. Because the wind does not blow all the time, wind-energy never will be able to contribute more than 5-30 percent of the world's present electricity demand.

And a popular proposal to meet Northern Europe's winter energy demand, by utilizing solar collectors in the Sahara desert, falls to acknowledge that about 95 percent of the collected energy would be lost in transmission and conversion.

A person living in a First World city requires the equivalent of about 4.5 hectares (11.1 acres) of productive land for food, water, housing and goods (as well as carbon sinks to soak up the carbon dioxide produced by their energy use). Applying this "ecological footprint" standard to Australia shows that Sydney needs an area of productive land 35 times as big as the city to sustain itself. For 11 billion people to live like people in Sydney, we'd need about 50 billion hectares (124 billion acres) of productive land — around six times all the

productive land on the planet.

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Fail (Southern Hemisphere) 1997

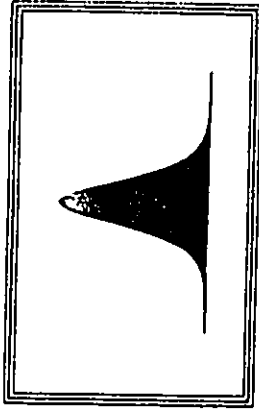


FROM JAY HANSEN

# The Coming Oil Crisis

by

## C.J. Campbell



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Okahara & Associates, Inc.  
Kailua-Kona

MULTI-SCIENCE PUBLISHING COMPANY  
&  
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ROGER HARRIS  
P O Box 803  
KAHOLEA, HI 96743  
(808) 885-4872 FAX: (808) 885-5721  
PROJECT MANAGER • PLANNER • CONSULTANT

December 19, 1997

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Dept. of Transportation  
555 Zang Street  
Denver, Colorado 80228

Dear Mr. McCauley:-

Draft E.I.S.: Saddle Road  
County of Hawaii  
EIIWA Project No. A-AD-6(1)

I am a planner in Hawaii working for Messrs Robert Arce, owner of Waikii Ranch Phase II: 1,000 acres containing 74 lots, and Mr. Michael Prohoro II, Project Manager for Waikii Ranch Phase II.

2 We have reviewed the Draft E.I.S. and would like to make the following comments:  
3 1. Alignment alternative W-2, as presented in the EIS and at the December 11 public hearing is too close to the existing Waikii Ranch Project and Waikii Ranch Phase II.

6 2. It appears that headlights will be aimed directly up at Waikii Ranch as evening traffic moves east from the intersection at Mamalahoa Highway and Waikoloa Road on the W-2 alignment. This problem looks solvable by altering the W-2 alignment or selecting W-3.

101 3. The Social Impact Assessment section of the DEIS provides several interesting observations quoted here:

"Socioeconomic Impacts: Mitigating Measures and Alternatives" ...

"Kaumana and Waikii are directly affected by Saddle Road. Residents of the latter are mostly wealthy and white. Kaumana is essentially a microcosm of Hilo. There are more elderly than Hilo and the rest of the Big Island, but fewer disabled non-elderly. Although average household incomes are slightly lower, fewer households are in poverty. In sum, no disadvantaged groups are disproportionately represented in the area affected by the project."

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KAILUA-KONA OFFICE

**"Issues of Environmental Justice" ...**

"The policy of the Federal Highway Administration (FHWA) with regard to environmental justice is to ensure that an EIS shall address whether any social group is disproportionately impacted by a proposed project and identify possible mitigation measures to avoid or minimize any adverse social impacts. This policy is in keeping with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*."

"The only communities affected directly by the presence of the Saddle Road are Kaunamāna and Waikōi."

**"Community Identity in Individual Areas" ...**

"The individual areas affected by the Saddle Road have very distinct histories, social makeup and identities. The community workshops and surveys were intended to allow residents to express for themselves what they valued about their community and what impacts they envisioned as part of the Saddle Road improvements. Their opinions inform the following characterizations." ...

"Waikōi. Waikōi's rich ranching tradition and dramatic scenery presented the opportunity for a unique subdivision in the 1980s. All 130 lots have grazing easements and share large common areas (approximately 20 lots have homes; several other homes are also present outside Waikōi property). The arrangement has allowed continuation of ranching activities under the supervision of the lot owners' association. In addition to cattle, many residents raise horses and are involved in equestrian activity. Waikōi's polo field accommodates a regular schedule of polo matches attracting teams from throughout the state and players from around the world. The Waikōi Ranch Music Festival, normally an annual event for the past 6 years, features some of Hawaii's top musical performers and is open to the public, thousands of whom flock to the two-day event. Proceeds benefit various charities."

"Among the valued traits most commonly mentioned by Waikōi residents are the spectacular, cool weather and seclusion of the site. As one resident put it, 'It is rural, lovely, and exists on a very dangerous road.'"

**"Community Cohesion and Identity: Impacts, Mitigation Measures and Alternatives" ...**

"It is recommended that active consultation of the directly affected communities of Kaunamāna and Waikōi continue during the comment period for the Draft EIS. Community sentiment should be given strong weight as a factor in selecting the Preferred Alternative."

"Of course, we believe you should give very strong consideration to the sentiment of the residents and future residents of Waikōi. Nearly all of the 24 existing homes in Waikōi look down at alternative W-2 and will clearly be impacted by the headlight intrusion which will result if the W-2 alignment is not realigned."

4. The DEIS does not appear to address impacts to the Waikōi Ranch community in other sections. We believe this shortcoming should be corrected. The impacts to Waikōi Ranch in economic terms need to be addressed. Clearly the headlight problem will negatively impact land values in this area if alternative W-2 is selected as currently aligned."

5. It does appear that there are alternatives to the W-2 alignment which would mitigate the headlight problem and locate the road further west and south.

6. We can't find any evidence that a more south & west alignment was considered for W-2.

In summary, we are supportive of the plan to improve and realign the Saddle Road and the DEIS's general conclusions about the positive impacts this project should have on Hawaii's land. Alignment W-3 or a realigned W-2 addressing the concerns outlined above would be our choice. W-2 as presented is not acceptable.

Thank you very much for allowing us to comment. We look forward to your response.

Very Truly Yours,

*Roger A. Harris*

Roger A. Harris

cc. Mr. Robert Acree  
Mr. Michael Prohoroff  
Waikōi Ranch Homeowners Association

December 9, 1997

Karen K. Hayashida  
47-745 Akakoa Place  
Kaneohe HI 96744

Federal Highways Administration  
555 Zang Street  
Lakewood CO 80228

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

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DEC 11 1997

Re: **SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT**  
**PUBLIC HEARINGS: December 11 - 13, 1997**

Gentlemen:

I would like to take this opportunity to introduce myself. My name is Karen K. Hayashida and I am a native of Hawaii. After reviewing the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, I strongly believe that the document address all possible community concerns and technical information.

I was in the travel industry for 20 years and during these years I noticed the tourists visiting the Big Island of Hawaii always bypassed Hilo and other western regions of the island. The main concern is time. It took too long to travel from Kona to Hilo via the coastal route. On the other hand, car rental agencies does not allow renters to drive through the Saddle Road due to the conditions of the road.

The Volcanoes, Orchid Nurseries, Macadamia Nut Factory and not to mention all the beautiful natural water falls and vegetation will attract many a visitors to Hilo knowing that they will be able to travel on the Saddle Road on a shorter time frame and still be able to visit Kona and the resort areas of Waikoloa. To many visitors, time is a factor especially the Asian visitors that travel on special packages. Definitely, the Saddle Road would not only benefit the military but boost the economy in Hilo and also assist with the problems of unemployment.

103

Families will not have to maintain duo housing. With more visitors in Hilo, there will be more job opportunities. I know there are many families in Hilo who maintain two living quarters since job opportunities in Hilo is nil. Hilo residents can still travel on the Saddle Road to go to work if need be, and not have to retain two dwellings.

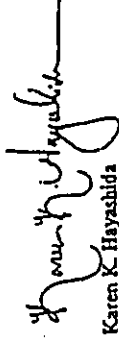
In summarizing the above, please bear in mind that citizens of the Big Island as well as visitors from afar will benefit from a project of this scope. The realignment of the Saddle Road will:

1. Generate more visitors to Hilo and the Big Island of Hawaii
2. Lower un-employment rate in the State of Hawaii
3. Cut-back duo housing
4. Prevent bad accidents (residents traveling to and from work)

I am most encouraged with the DEIS findings and mitigation plans and as a concerned citizen, I urge your support of the realignment of the Saddle Road.

Thank you for allowing me to voice my comments.

Sincerely,

  
Karen K. Hayashida

**RECEIVED**  
DEC 13 1997

December 13, 1997  
To: Saddle Road Public Hearing Officer  
University of Hawaii at Hilo  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Re: SADDLE ROAD DRAFT ENVIRONMENTAL IMPACT STATEMENT

I use Saddle Road as a first choice for recreational and commuting purposes between East and West Hawaii, although it is a dangerous road with added hazards in bad weather. The natural surroundings are outstanding, and deserve an educational/interpretive plan for residents and visitors as part of the realignment initiative, perhaps under designation as a Heritage Corridor with ISTEIA support.

Heritage Corridor designation could provide safety and educational elements for residents and visitors for our outstanding natural setting, increase community pride and involvement in the project, and provide some sustainable economic opportunity, as follows:

- 105 • Safe turnouts for viewing areas with appropriate warnings to avoid fire hazards or unsafe access areas.
- 106 • Interpretive/Informational all-weather signage identifying key biological reserves (kipuka), mamane forests, lava flows (by year), historical trails or areas, and cultural sites if approved by cultural leaders.
- 107 • Information on driving and road warning conditions especially for Mauna Kea summit road and the Mauna Loa cinder road where 4-wheel drive is encouraged or required.
- 108 • Designated gathering points for nature walks, hunting or horseback excursions with authorized guides.
- 109 • Safety berms, bikeways and appropriate natural landscaping in keeping with the area's important aesthetic qualities.
- 110 • Collateral printed materials at visitor or educational facilities to augment educational opportunities for student excursions, visitors, and community organizations.

Responsibility for the project could be initiated by established community organizations and be expanded/implemented over time utilizing ISTEIA and other funding sources at minimal cost to the highway project.

PLEASE BUILD THE ROAD, AND MAKE IT BEAUTIFUL!

*Paula Z. Heifrich*

Paula Z. Heifrich  
575 Alawaena Street, Hilo, HI 96720

December 18, 1997

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Denver, CO 80228

Via Fax: (303) 969-5903

Post Office Box 68065  
Kamuela, HI 96743  
Telephone: 808-885-6460

**RECEIVED**  
DEC 2 1997

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Dear Mr. McCauley:

2 I am a homeowner at Waiki'i Ranch on Saddle Road on the island of Hawaii. Although I have been aware for some time that several options for the realignment of the Waikoloa end of Saddle Road were under consideration, it has only just come to my attention that one realignment option (W-2) would come within 1,500 feet of the Waiki'i community.

3 I was stunned to learn that serious consideration is being given to a realignment option that would route heavy traffic volume so close to the Waiki'i community. Although I have not had an opportunity to examine the environmental impact statement (EIS) required by the National Environmental Policy Act (NEPA), it is difficult for me to believe that the EIS would survive a legal challenge if it fails to address in depth the visual impact, noise level impact, and economic impact (land values) on the only large community of farms and homes along Saddle Road. I am informed by another homeowner at Waiki'i that the EIS is flawed, inaccurate, and incomplete on these issues.

4 As I leave tomorrow on vacation, and as I understand the comment period for the EIS expires on December 22, 1997, I am sending this abbreviated comment to register my opposition to the W-2 alignment option. However, I am also raising the question as to the adequacy of the EIS if it, in fact, fails to address properly the adverse impact of W-2 on Waiki'i Ranch residents and their land values. Having authored a law review article some years ago on NEPA, I am familiar with the standards an EIS must meet, and I look forward to reviewing with counsel to the Waiki'i Homeowners' Association those sections of the EIS that should have addressed our concerns.

Very truly yours,

*David D. Higgins*  
David D. Higgins

RECEIVED  
DEC - 9 1997  
HAWAII DEPT. OF TRANSPORTATION

FHWA (HPD-16)  
Box 50206  
300 Ala Moana Blvd.  
Honolulu, HI. 96850

Dear Mr. Abraham Y. Wong,

I am writing about the proposed Saddle Road improvement project. I am basically for the project and the benefits an improved road could bring to the community. However, there is a concern not addressed in the project bulletin included in my Sunday paper.

How are all these people, cars and bikes supposed to get to the improved Saddle Road? Mile two to six on Kaunamana Drive is already dangerous and over loaded with traffic. If Saddle Road becomes the main corridor of traffic between Kona and Hilo, this area will be a disaster. Are the cyclists supposed to benefit from wide shoulders supposed to drive to Saddle Road, or are they expected to "run the gauntlet" between mile two and six? The next time you come to Hilo, I invite you to contemplate riding a bike or walking up Kaunamana Drive the way it is. Then imagine what it will be like will all this increased traffic.

Please consider this factor in your plan. The proposed Punaluu cut off or improvements to Kaunamana Dr. (between mile two and six) may greatly improve the success of this project and the safety of everyone.

Sincerely,  
*Robert and Erin Hill*  
Robert and Erin Hill  
564 Kaunamana Dr.  
Hilo, HI. 96720

1 1 1

December 12, 1997

RECEIVED  
DEC 13 1997

Federal Highways Administration  
555 Zang Street  
Lakewood, CO 80228

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Gentlemen:

My name is Myra Ikeda and I am in support of the Saddle Road Realignment Project. I reviewed the Executive Summary of the Draft Environmental Impact Statement for the Project and believe the document addresses all possible community concerns and technical information.

36

I am a resident who lives just above the 6-mile marker on Saddle Road and use it frequently to travel to West Hawaii to attend meetings, various events and activities, and enjoy the shopping and resort areas. While it is a shorter, quicker route than Hamakua, it is also a much more dangerous route in its present condition. I look forward to a Saddle Road which will facilitate transportation between East and West Hawaii in a much more efficient and safe manner.

The proposed project also seems to allow flexibility in selecting alternatives if any previously unrecognized environmental or historic sites are discovered during the course of construction.

I recommend expedited support for this import project.

Thank you for the opportunity to submit these comments.

Yours sincerely,

*Myra S. Ikeda*

Myra S. Ikeda  
Hawaii Island Resident

**RECEIVED**  
DEC 11 1997

OKAHAKA & ASSOC., INC.  
KAILUA-KONA OFFICE

Federal Highway Administration  
555 Zang Street  
Lakewood, Colorado 80228

Re: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING - DECEMBER 11/13, 1997

Gentlemen:

36 My name is Jon Ishikawa and I am a resident of Hawaii. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, and believe that the document addresses all possible community concerns and technical information.

I am a frequent visitor to the Big Island of Hawaii and stay mostly on the Kona coast, and drive over to Hilo on most every visit. I would use the saddle road to make this drive and believe that it would save me a great deal of time, and be a real convenience.

I feel citizens of the Big Island - both corporate and the community at large - will benefit from a project of this scope. We are most encouraged with the DEIS findings and mitigation plans, and urge expedited support for this important project.

Thank you for the opportunity to submit these comments.

Jon Ishikawa  


E. JOY JEMMOTT  
P. O. Box 1593, Kamuela, HI 96743

**RECEIVED**  
JAN 2 1998

OKAHAKA & ASSOC., INC.  
KAILUA-KONA OFFICE

December 18, 1997

Federal Highway Administration, (HPD-16),  
555 Zang Street, Room 259,  
Lakewood, CO 80228

Attention: Larry C. Smith - Division Engineer

Dear Mr. Smith,

I have attended a couple of meetings of the Waimea Community Association at which Mr. Bill Moore gave presentations about the proposed Saddle Road Improvements and have scanned the E. I. S.

In Section I - I believe that the W-2 alignment to the junction of the Waikoloa Road is by far the most generally desirable. It will effectively cut down commuting time for those who live in Hilo and work in Kona AND is the most efficient access to those working in the Kohala Coast Resorts - Mauna Kea, Mauna Lani, Waikoloa and even Four Seasons. This is a large combined employment base.

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In Section II - I believe it would be to the ultimate safety and efficiency for the highway to run along the perimeter of the training area, and therefore support the alignment of PTA-1. In addition, the proposed mitigation measures to counteract jeopardy to the Palila Critical Habit area appear to offer the most far-reaching benefits.

114

Yours truly,

  
E. Joy Jemmott



12/23/97 11:42 25808 885 0433 WAIKII HO ASSN \*\*\* EWA CELLD Q001

TO: Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Denver, CO 80228  
FAX (303) 969-5903

December 22nd, 1997

RE: W-2 ALIGNMENT OF SADDLE ROAD

Mr. McCauley,

1 I am a resident of Waiki'i Ranch, a gated community off of Saddle Road on the Big Island of Hawaii. I strongly oppose the proposed W-2 alignment of Saddle Road that would run very close to the Southern boundary of this ranch.

2 I have been a resident of Hawaii since 1979. I have lived and worked in many areas of several of the islands. Five years ago, after researching dozens of areas, I was convinced that Waiki'i was the best place for me with the lifestyle and opportunities that I wanted, and it became my goal.

3 I achieved that goal almost two years ago. I moved my horses and myself to Waiki'i Ranch where I now reside. I earn my living on the ranch working with horses and cattle, as well as looking after property for many of the homeowners in their absence. I am familiar with every inch of this community, and I appreciate the serenity and beauty of the ranch style life that we have at Waiki'i.

4 The proposed W-2 alignment of Saddle Road would forever spoil the type of environment that we have at Waiki'i Ranch. I cannot imagine to have to sleep with the noise of traffic rather than the silence broken by the occasional rustle of the livestock. I don't want to imagine the sight of constant headlights taking the place of the darkness lit up by only the moon and stars. I am unable to imagine the impact that this will have on the property values of existing homes, as well as the future development of Waiki'i, which is in the planning stages.

5 Please look at your other options and do not destroy what we have at Waiki'i Ranch.

Sincerely,  
*Pat King*  
Pat King  
Resident - Lot 83  
Waiki'i Ranch  
PO Box 2213  
Kamuela, HI 96743  
(808) 885-0689

RECEIVED  
JAN 2 1998  
OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

HICA HAWAII ISLAND CONTRACTORS' ASSOCIATION  
494 C KALANIKOA STREET - HILO, HAWAII 96720 - PHONE (808) 935-1316 - FAX (808) 934-7779  
TESTIMONY FOR THE SADDLE ROAD PROJECT PUBLIC HEARING  
DECEMBER 13, 1997 - HILO, HAWAII  
KEN KIYOSAKI, PRESIDENT  
OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

RECEIVED AS FOLLOWS

1 My name is Ken Kiyosaki and I reside in Hilo, Hawaii. I am speaking today as the President of the Hawaii Island Contractor's Association and as a member of our Big Island community. In my role as President of the Contractor's Association, I represent the voice of over 260 members who are large and small businesses involved in construction related activities.

119 I am here to speak in favor of the proposed Saddle Road project. Our island has an abundance of natural resources and is rich in potential, but we are also facing a critical crossroad in our economic future. Businesses want to invest in our community but, without improved infrastructure and a better business climate, future job opportunities for our children are bleak. We all know that the construction industry is struggling. The build-out of this project, together with the increased cross-island traffic, will allow businesses to expand their market base and become more secure and viable.

As a member of our Big Island community, I often drive the existing Saddle Road to commute between the East and West sides of our island. I strongly believe that the existing road is unsafe and a liability to everyone. As a father, I would hope that my children never have to drive it.

120 I feel that the draft EIS addresses the key impacts, possible mitigation techniques and alternatives to this project and is sensitive to our unique, indigenous environment. I also believe that, while it is important to preserve biological and historical resources, we need to balance our preservation measures with the needs of our human resources. In other words, if our laws regulate and force us to consider a bug more important than the lives of human beings, I think it is time to reconsider our direction.

121 I hope that this project will go forward and take our island another step closer to a healthy economic future. Thank you for the opportunity to testify on behalf of the contractors on this island and more importantly as a parent, who has a very big stake in the future of our island.



RECEIVED AS FOLLOWS

KATHRIN G. KOHLER  
P.O. Box 358  
Kamuela, Hawaii 96743

Mr. A.Y. Wong - Federal Highway Administration  
page 2

December 18, 1997

Via Enclosure #808-541-2704  
Federal Highway Administration  
Attention: Mr. Abraham Y. Wong - Division Administrator  
P.O. Box 50206  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850

Re: Proposed Saddle Road Alignment  
Hawaii Island

Dear Sir,

After attending presentations regarding the re-alignment of the Saddle Road on the Big Island, and scanning the EIS, I want to comment on some of the features.

Mr. Bill Moore gave a very good presentation, explaining the pros and cons and answering all of our questions.

38 Regarding Section 1: I believe strongly that the W-2 alignment should be chosen. It will benefit the many people who live in Hilo and work on the South Kohala Coast. They will now be able to commute in a reasonable time from their homes and families in the Hilo area to the South Kohala Resorts where the jobs are now and where more will be created in the future. It will also benefit the traffic going to Kona, since it will connect the Saddle Road with the Queen's highway, which is the more efficient and safer to travel than the windy "upper highway".

1.1.3 Regarding Section II: I strongly believe PTA-1 to be the route to take. It will take the traffic away from the military's training area, and thus make it safe for both the military and the general public.

It appears that the proposed mitigation measures will not only protect the Palila's habitat and the sensitive ecosystem of the area, but will enhance and enlarge it.

Looking forward to seeing this project move forward in the near future.

Sincerely,

*Kathrin G. Kohler*  
Kathrin G. Kohler

RECEIVED  
JAN 2 1998  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

OPTIONAL FORM NO. 10  
FAX TRANSMITTAL  
To: *Bob McClellan*  
From: *Kathrin G. Kohler*  
Date: *12/18/97*  
Page: *2*  
Fax #: *708-918-5603*  
Tel #: *800-541-2704*



RECEIVED AS FOLLOWS

**MAUI HUNTING ASSOCIATION**

C/O 16-1596 Palton Hwy; Keaau, Hawaii 96749  
(808) 966-7313 (808) 966-4070 Faxline

"a voice of hunting clubs in Hawaii"

**RECEIVED**  
JAN 2 1993

OKAHAKA & ASSOC., INC.  
KAILUA-KONA OFFICE

Comments on Draft EIS - Saddle Road Mitigation

To Whom It May Concern:

1. Weather will always be a factor on Saddle Road. Travel between Ilio and Kona or Waimaea will always be subject to the weather and the attendant danger of high wind and fog.

2. Reference to biological resources to not include any game birds nor does it consider our game mammals -- most of which have been here for hundreds of years. These game animals (some of them gifts to the Monarchy) have become an integral part of the biota -- witness Mauna Kea. We believe and insist that any and all impact to this resource be adequately addressed in agreement with the hunting and recreational bird and animal watcher communities. In this light, we reject the no mitigation recommendation of Ron Terry.

3. Socio Economic Factors in the handouts do not recognize the specifically positive beneficial results that accrue to those who utilize the area for hunting and other recreation -- such as game watching, bird watching, bird dog training, and mental relaxation and therapy. It is probably the only area available to the disabled, elderly, or those who are physically limited due to ill health or injury who like to hunt.

4. Proposed realignment through PTA areas 1-4 (new) old area 1 would be a major disruption of one of our most productive hunting areas. This area is accessible to tourists with two wheel drive vehicles and for bird hunting, is one of the only areas that can be successfully hunted without dogs.

a. This proposal recommends a continuing loss of our most productive hunting areas by removing our one truly multi use game bird and game mammal hunting area accessible to all, not just well equipped 4 wheel drive vehicles. One also has to consider the proximity Mauna Kea State Park and the ability camp and hunt from this location.

b. Realignment through this area would create a massive loss of hunting and recreation without benefit to the Army either. This area still has been named critical habitat and no maneuvers out to the lava fields would be tolerated by either the U.S. Fish and Wildlife service or even the Army's own office of the environment or whatever they are called.

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**RECEIVED**  
JAN 2 1993

OKAHAKA & ASSOC., INC.  
KAILUA-KONA OFFICE

Federal Highways Administration  
555 Zang St., Room 259,  
Lakewood, Co., 80228

Dear Sirs,

This letter is in regards to the upcoming decisions on approving the redesign and reconstruction of Hawaii State Route 200 - Saddle Road. As a Big Island resident of twenty years, and a regular commuter on the existing Saddle Road, I strongly support the project because Hawaii needs these improvements. Our belt highway requires over two hours to travel either direction from Kona to Ilio, and the four hour plus round trip commute creates weary travelers that may be prone to accidents.

The concept of shortening our distance between the two sides of the island is as old as man has lived here. The ancient Hawaiians had several trail systems that went "over the hill" rather than along the coast. The early horse and buggy route from Ilio to Waimaea goes mauka along Mauna Kea rather than in and out of the valleys of Hanakua. More recently during WWII, the Army started the "Ilio-Kona Road" along the south crest of the saddle. Several miles of dozed roadway already exists at the foot of Mauna Loa. This runs in a straight-line alignment, aimed directly towards our two major cities. It has been said that if this road was ever completed, the drive time from Ilio to Kona would only be about 45 minutes!

Realizing the cost and complexities of pursuing a new Ilio-Kona road, our next best option to improve our commute across the island is to upgrade the existing Saddle Road. Many people travel daily for work and business, or routinely to shop at stores only available in one district. The upgraded road system will reduce the travel time, improve the safety of the drive, and alleviate traffic on the Hanakua coast. When I worked atop Mauna Kea in 1986, I was using Saddle Road daily, and it is still my preferred route to the other side of the island. But Saddle Road is well known to be dangerous to those who are not familiar with it, and I can remember several people who have narrowly escaped serious injury when their vehicles went out of control and off the road. Near misses with oncoming cars and army vehicles are a regular event, as the present road desperately needs widening, re-paving, and other improvements.

Please pursue the redesign and upgrade of a New Saddle Road. I believe the construction can be achieved in an environmentally and socially acceptable manner. I also believe the majority of the people on Hawaii are of the conviction it is a worthy project, also creating jobs and improving our Big Island. Most feel they will be brought closer together by its completion.

Sincerely,  
*Chris J. Lawson*  
Chris J. Lawson, M.S.C.E.  
P.O. Box 5688,  
Kailua-Kona, HI, 96745.

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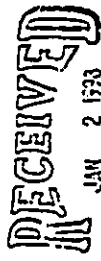
Ted Lum, P.O. Box 930, Kaneohe, HI 96743

December 22, 1997

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Dept. of Transportation  
555 Zang Street  
Denver, CO 80228

RE: Comments on Saddle Road Realignment  
FHWA Project No. A-AD-6 (1)

OKAWAKA & ASSOC., INC.  
KAILUA-KONA OFFICE



RECOMMENDATIONS:

- 28 1. We recommend that the Saddle Road Realignment be along route EX-2.
  - a. Any other route along the eastern side of Mauna Kea State Park will have adverse effects on one of our most beneficial hunting areas.
  - b. Any other route along the eastern side of Mauna Kea State Park will have adverse effects on soil, vegetation, birds, mammals, and invertebrates.
  - c. Any route along the eastern side of Mauna Kea State Park will have adverse effects to Mauna Kea State Park from the standpoint of Noise and Quiet enjoyment.
- 130 2. Route EX-2 is the best route considering all of the factors to be impacted by any other route.
- 29 a. Palila Mitigation - If EX-2 is selected then there is no need for the ridiculous mitigation required and proposed by the U.S. Fish and Wildlife Service which compensates themselves on a 10 to 1 ratio.
- 128 b. Hunter Mitigation - EX-2 would not require an additional expenditure of \$5,000,000 to hunters. In actuality, if hunters organized (and they are) they would surely insist on an equal 10 to 1 mitigation for loss of hunting area and access, and you would be looking at more like \$30,000,000 instead of \$5,000,000. If this is true, EX-2 could theoretically save as much as \$30,000,000.
- 32 c. EX-2 does not impact the Army's ability to utilize areas 1-4. They by their own guidelines for Sensitive Ecological Areas won't permit artillery firing or the use of tracked vehicles anyway.
- 131 3. We know that along route EX-2 that no endemic species to Hawaii are resident.
  - a. Because of a lack of impact to endemic, indigenous plants or game animals this route is by far the most appropriate.

Thank you,  
*Thomas H. Lodge*  
Thomas H. Lodge, President

I would like to submit the following comments on the Saddle Road Realignment Draft Environmental Impact Statement:

Section 1-  
Selecting W-2 or EX-1 is preferred. Contrary to the draft EIS, (pg. 3-49, paragraph 2) W-3 would have an impact on the Puuanalu Game Management Area which is the largest game mammal bowhunting area on the west side of the island. With the erosion of feral mammal hunting areas (pg. 3-48, paragraph 5), it puts greater strain on existing areas. Poachers will certainly use W-3 as an easier access route to the Puuanalu GMA and have a significant impact on recreational opportunities for law-abiding hunters.

Section II-  
Although I can appreciate the U.S. Army's desires (PTA-1 and PTA 3) for more realistic training (Pg 1-4, 1.6.2 Conflicts/Hazards with Military Operations), I do not think it should come at a price of \$15 million for the Palila mitigation plan. Should the Palila mitigation plan be absolute, I would choose to select EX-2 as the preferred route.

PTA-1 or PTA-3 will definitely impact the public hunting that goes on in the area. The area is readily accessible to 2 wheel drive vehicles and a favorite among hunters who are less mobile (senior citizens/youngsters) due to its relative inaccessibility. This area would be lost as well as Kaohe Lease (part of the Palila mitigation) should PTA 1 or 3 be selected.

Technical Appendices- Volume III- Biological Assessment

Palila Mitigation Plan

\*Acquisition of Kipuka Alaia (Pg. 26, paragraph 3)  
USFWS and USGS/BRD have stated that Palila need an elevational gradient where Mamane flowers/seed pods will be available to the birds throughout the

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**General Comments:**  
 -Requiring heavy equipment and construction vehicles to be steam cleaned is a noble gesture. However, we don't require it of any other vehicles in the area such as the military who has access to extremely sensitive ecological areas.

-As someone concerned for the environment and native species, I would like to see work focus on lands already set aside for Pailla. Almost the entire Mauna Kea mountain has been designated critical habitat for Pailla. Why do we need to get other areas when there is already over 80,000 acres of habitat set aside for Pailla. Work in this area should be the focus. I submit that perhaps the Pailla critical habitat lines were not drawn very carefully from the onset and marginal areas were included as being important. One such marginal area is in Section II where PTA-1 and 3 propose to go through. I believe this area is being used as an Endangered Species Act "bargaining chip" and is being traded to get "something for nothing". Perhaps the critical habitat boundary map should be revisited.

-Should PTA 1 or 3 be selected and the Pailla Mitigation package be approved, will there be any accountability for results at the end of the project funding? Today large tracts of land are being set aside, fenced and feral animals eradicated for the purpose of ecosystem recovery. Unlike a contractor, natural resource agencies haven't had to "deliver the goods" as agreed upon. A contractor's client has recourse if he/she doesn't get the product they agreed upon. I would like to see measurable goals and objectives established prior to the release of any monies for Pailla mitigation.

-As a frequent user of the Saddle Road, I can see the need for road improvements with regard to the public safety issue. As a taxpayer, I feel the cost of this realignment is far too costly and the driving factor for that is the Pailla mitigation package. To put it bluntly, the Saddle Road Realignment project is a "gravy train" and people are trying to get funding for their projects.

-Realizing that the Endangered Species Act is a very real issue to deal with, I suggest staying out of the Pailla critical habitat in Section II and work on the existing portions of Saddle Road.

Thank you for the opportunity to comment on the draft Environmental Impact Statement.

Sincerely,



Tod Lum

133 year. With that premise, Kipuka Alaia, a relatively flat area, does not meet this criteria. Pailla released in this area will be subjected to a "feast or famine" scenario whereby mamane flowers and pods are available during certain times of the year and the birds will be forced to seek other areas once the food has dwindled. This area is not large enough to sustain pailla through the year nor is it adjacent to a large mamane forest. This area should be deleted from the mitigation plan.

134 Much of the public sees the acquisition of Kipuka Alaia as a land grab disguised as a Pailla mitigation measure. From a public relations standpoint, Kipuka Alaia should be opened to public hunting to reduce the number of feral animals in the area. Historically, access has been restricted and only compounds the problems with feral animals impacting the native vegetation. Opening the area to public hunting is a win-win situation for the Army, the hunters and the plants.

135 •Kaohē Lease  
 This is a very important area to youth hunters who look forward to hunting in the area each year. It is a relatively open area that makes it very safe for young hunters learning how to negotiate obstacles and other hunters in the field. It is a great place to learn and hone responsible hunting skills for up and coming young hunters. After the youth season older hunters with mobility problems also look forward to hunting in the area for the same reasons. These conditions could not be done without cattle as they are definitely responsible for this setting. Game bird densities in this area range from good to excellent from year-to-year depending on annual rainfall. In years where rainfall is abundant, cattle need not be grazed at these higher elevations which leaves this pasture with more cover. Hunters look forward to hunting in this area each year because of the game birds found in the area. Mowing cannot replace grazing as game birds thrive on available dung beetles which are dependent on cow dung. Mowing is also very labor intensive and costly.

135 I would recommend fenced corridors to afford mamane trees protection from grazing, yet cattle would still be allowed in portions of the area. Once trees are large enough, allow cattle grazing within the enclosed area and rotate the fenced corridors to promote reforestation in other areas. An operation of this sort would require close coordination with the rancher while saving time and money spent on mowing. It also addresses the bigger threat of fire by reducing the fuel load associated with grass build-up.

136 •Acquisition of Puu Mall State Leases  
 Bird hunters will appreciate the net increase in available hunting acreage. The three parcels listed contain fair to good amounts of game birds. Rocky areas with dense stands of pukiaue (*Styphelia* sp.) contain good densities of Erckel francolins (*Francolinus erckelii*). The pasture areas have marginal numbers of pheasants (*Phasianus* sp.) and Japanese quail (*Coturnix* sp.). Being the target areas for mamane reforestation I would suggest a similar grazing scheme as outlined in the Kaohē Lease section.

*Handwritten note:* Mowing Mt. Kaohē

DIRECTOR'S OFFICE  
 DEPT. OF TRANSPORTATION  
 1028 H  
 CANOE LAKE  
 HAWAII  
 96743  
 DATE: 10/28/97  
 SHEET NO. 12  
 RECEIVED  
 DIVISION

**WAIKI'I RANCH**  
**HOMEOWNERS' ASSOCIATION**

December 8, 1997

FHWA (HPD-16)  
 555 Zang Street, Room 259  
 Lakewood, CO 80228

**RECEIVED**  
 DEC 11 1997

OKAHARA & ASSOC. INC.  
 KAILUA-KONA OFFICE

Attn: Mr. Larry C. Smith, Division Engineer

Dear Mr. Smith:

This letter contains comments of the Waikii Ranch Homeowners' Association regarding Section 1 of the Hawaii Saddle Road realignment project. Waikii Ranch is a community of 130 existing 10, 20, and 40 acre ranch lots, with pending development of another 1,000 acres into similar lots.

We have been informed that consideration is being given to the idea of dead-ending the existing Saddle Road (State 200) near mile post 42 just before it intersects the improved and realigned Saddle Road. Our community and other residents in the area depend on this section of road being open in both the Hilo and Waimea direction. We have residents who commute on a daily basis to Hilo. Dead-ending the existing Saddle road could add as much as one hour to the daily commute of these people.

In addition, dead-ending the existing Saddle Road will cut us and other residents in the area off from fire protection by the fire department at Pohakuloa. The Pohakuloa fire department has been first to arrive during fires that have taken place on the Ranch. We do not wish to lose this fire protection under any circumstances.

The Waikii Ranch Homeowner's Association urges you to leave the existing section of Saddle Road connected to the improved and realigned Saddle Road. Use of this road by other than local traffic could be restricted by weight limits or other methods.

Sincerely,

*John F. McDermott*  
 John F. McDermott, M. D.  
 President, Waikii Ranch H.O.A.

cc: Senator Daniel K. Inouye; Governor Ben Cayetano; Mayor Stephen Yamashiro; County Councilman John Ray

P.O. Box 6389 • Kaneohe, HI 96743 • (808) 885-4884 • FAX (808) 885-0433

Dear Mr. Hamachi,

I attended the public hearing for the Royal Waiholoan Road project last night at the Royal Waiholoan. I was impressed by the underlining and reformation of the affair. Good job.

Please, repair saddle road! I have driven this road over 700 times in the last 7 years and it is a ~~menace~~ **MENACE!**

We ran over 18 wheelers, 36 crashed 4 wheel drivers, body bags, mangled rental car, dead cow (we hit 2 myself), mangled pigs, dead birds. It is a magnet for accidents. I even saw a helicopter crashed in the middle of the road! And, unbelievably, more of it is a frightening as when the army... fires live ammo around your. My only question: When will it be done sincerely.

**WAIKI'I RANCH**  
HOMEOWNERS' ASSOCIATION

FHWA (HPD-16)  
555 Zang Street, Room 259  
Lakewood, CO 80228

Attn: Mr. Lamy C. Smith, Division Engineer

Dear Mr. Smith:

This letter contains comments from the Waikii Ranch Homeowners' Association regarding Section 1 of the Hawaii Saddle Road realignment project. Waikii Ranch is a community of 130 existing, 10, 20, and 40 acre ranch lots, with pending development of another 1,000 acres into similar lots. The proposed Section 1, W-2 alignment skirts the western boundary of our community.

1 2 2 1. We favor the W-3 alignment. The primary goal of the project is to improve the connection between Kona and Hilo. The W-3 alignment best suits that purpose.

2 2. We strongly oppose the W-2 alignment. It will produce unacceptable levels of noise and light pollution for our community. Waikii Ranch was designed with strict noise and light restrictions. The portion of W-2 running north/south along our west boundary is downhill from Waikii Ranch. The natural effect of sound carrying uphill will have an adverse effect on our residents, and will destroy the atmosphere of quiet and tranquility that prompted them to locate here.

4 0 The covenants and restrictions governing construction on the Ranch do not allow street lights, or even exterior house and driveway lighting. The portion of W-2 running east/west just below our west boundary will result in an endless stream of bright lights shining directly into the Ranch as the projected volume of night traffic makes its way uphill from Waikii Ranch. This will negate one of the fundamental concepts that was master planned into our community.

7 Waikii Ranch is an agriculturally zoned community, and is being used by many residents for the breeding of purebred horses and cattle. This activity is expected to increase in the future. The proximity of heavy highway traffic will produce a negative impact on our agricultural operations and overall life style, and will be destructive to the future development of the community.

For these reasons, we urge you to reject the W-2 alignment!

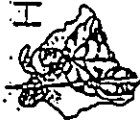
Sincerely,

John F. McDemott, M. D.  
President, Waikii Ranch H.O.A.

cc: Senator Daniel K. Inouye; Governor Ben Cayetano; Mayor Stephen Yamashiro; County Councilman John Ray

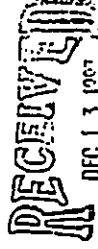
P.O. Box 6389 • Kaneohe, HI 96743 • (808) 885-4844 • FAX (808) 885-0433 RECEIVED

DEC 15 1997



**Hawaii Island Chamber of Commerce**

Established in 1898 • 201 Kamehameha Ave. • 1450, Hialeah 96720 • Phone (808) 933-2178 • Fax (808) 961-4133  
email: hicc@hawaii.net



OKAHARA & ASSOC., INC.  
KAILUA-KUONA OFFICE

December 11, 1997

FHWA  
P. O. Box 50206  
300 Ala Moana Blvd.,  
Honolulu, HI 96750

Comments on the Saddle Road Environmental Impact Statement

The Hawaii Island Chamber of Commerce (HICC) is in support of the proposed Saddle Road improvement project. We have reviewed portions of the EIS and had several opportunities to hear presentations by members of the project team. We believe that the major issues associated with the road have been addressed in the report and have been fully discussed in a wide range of public and advisory group meetings. Public communication efforts during the development of the EIS have been more than adequate and we congratulate the project team on their work on this complex and important endeavor.

Our support of the proposed Saddle Road improvements is based on several issues that have significant economic impact on the Island of Hawaii and the State as a whole.

Pohakuloa Training Area (PTA)

The proposed improvements will provide a major service to ongoing military operations at PTA. Relocation of the road along the PTA-1 alignment will remove civilian traffic from the active training area and allow for more efficient use of the existing alignment for military activities. There are significant public safety issues associated with live-fire exercises overlapping with public use of the current roadway. The mix of military and civilian traffic within the training area is also an issue of ongoing concern. We believe that the long term stability of PTA as a training center for Pacific-based arm forces is an essential factor, both to our national security and to the economic contribution that military operations make to this state. Alternative route PTA-1 will help to resolve public safety issues associated with the military use of the area and will address significant impediments to the long term stability of the military's contribution to this community. We support this route in particular.

Cross-Island Commerce

The Saddle Road provides an important alternative link between East and West Hawaii. As we grow, this island community has increasing needs to commute and commerce from one side of the

1 3 9



November 7, 1997

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U. S. Department of Transportation  
555 Zang Street (Room 259)  
Lakewood, Colorado 80228

RE: HPD-16E (Saddle Road)  
Draft Environmental Impact Statement  
FHWA Project No. A-AD-6(1)  
Dear Mr. McCauley:

We have reviewed the Draft EIS for the Saddle Road project and have focused our attention on the project terminus at Mamalahoa Highway (State Highway 190).

Currently, the majority of federal troop and equipment movement between Kawaihae Harbor and the Polihale Training Area utilizes the Queen Kaahumanu Highway (State Highway 19). Waikoloa Road route. Of the two alternatives proposed for the western terminus in Section 1 for the project, Route W-2 is the most logical and appropriate option. Connection of the Saddle Road at the Waikoloa Road junction with Mamalahoa Highway will provide the most convenient and safe routing for both the military and the general public.

The alternative W-2 would provide direct access to Kawaihae Harbor and would necessitate a 10 to 12 mile route through a (east-west) connector road through State land and hunting preserves. In addition, the intersection at Mamalahoa Highway presents severe design constraints for safe sight distance and grades.

We understand that a subsequent Environmental Impact Study is underway to study alternative routes for completing the connection of the realigned Saddle Road to

island to the other. The proposed improvements will have a significant impact on the speed and safety of this cross island connection. Currently the Hawaii Belt Highway along the Hamakua Coast is the most efficient link between east and west. Narrow bridges and rugged terrain render the Hamakua route an expensive alternative to expand. The cost of constructing additional traffic lanes along the Hamakua Coast is prohibitive. This provides a strong economic justification for Saddle Road improvements.

Visitor use of the Saddle Road is also cited in the EIS as a significant user of the improved road. The linkage between the resort communities on the Kona/Kohala coast and the Hawaii Volcanoes National Park is already well established. Saddle Road improvements will enhance this linkage and provide visitors a unique and spectacular touring option.

Astronomical and Atmospheric Science

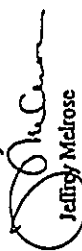
Hawaii Island is fortunate to be the host for some of the most important astronomic and atmospheric research on earth. Both the summit of Mauna Kea and the slopes of Mauna Loa are world renown for research that is on the forefront of mankind's quest to understand our own world and the stellar universe in which we live. The Saddle Road is the critical link between these research sites and their support facilities on all sides of the island. Construction, maintenance and operations are daily occurrences on both mountains. The Saddle Road improvements will facilitate this activity immeasurably.

Alternative Routes

The EIS presents several route alternatives, each with its own collection of opportunities and constraints. It is clear to us that PTA-1 is the most efficient option in Section 2 and the one that most serves the long term needs of the military users and funders of the road.

On the west side of the alignment, alternative W-2 provides the most direct link into the existing island-wide road network. As such, it provides an efficient option to deliver traffic to the resort and residential communities in South Kohala without unduly extending travel for Kona bound traffic. W-3 on the other hand will require the design and construction of an additional roadway to connect Mamalahoa highway with the Queen Kaahumanu Highway. This will add additional public expense to the overall island-wide roadway network and duplicate existing infrastructure without significant new benefits.

We thank you for the opportunity to comment on this important project. Again we congratulate the project team for their work and their commitment to addressing the many issues that are attached to this otherwise relatively straight forward piece of roadway engineering.

Sincerely  
  
Jeffrey Melrose  
President

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U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
WASHINGTON, D.C. 20541



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95 NOV 30 10:53 AM

OFFICE OF ENVIRONMENTAL QUALITY CONTROL

November 29, 1995

Mr. James Anderson  
RUST Environment & Infrastructure  
5343 North 16th Street, Suite 400  
Phoenix, Arizona 85016

RE: HAWAII STATE HIGHWAY 200 -- SADDLE ROAD PROJECT,  
HILO TO MAMALAHOA HIGHWAY  
ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Anderson:

As the owner of property which will be impacted by the proposed Saddle Road realignment, and over which one of the possible realignment routes cross, we hereby request that we be a consulted party during the preparation of the Draft and Final Environmental Impact Statements for this project.

We appreciate your cooperation and that of your sub-consultant, Okahara & Associates, in keeping us informed as this project progresses.

Sincerely,

Ken Melrose  
Vice President, Development

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OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

cc

- Office of Environmental Quality Control
- Okahara & Associates, Attn: William Moore
- Dept. of Transportation, Planning Branch, Highways Division, Attn: Kenneth Au
- U. S. Dept. of Transportation, Federal Highways Division, Attn: William Bird
- Waikoloa Village Association, Attn: Russ DeRemer

Queen Kaahumanu Highway and on to Kawailae Harbor and Kona International Airport. If Route W-2 is selected, improvements to Waikoloa Road will be necessary. Its present two-lane configuration can accommodate local traffic, but the convoys and increased cross-island traffic will necessitate road widening, addition of climbing and passing lanes, and other improvements to maintain safety and convenience for the general public.

We urge your favorable consideration in selecting Route W-2 and encourage timely study of the connecting route to the true project terminus at Kawailae Harbor.

Sincerely,

Ken Melrose  
Vice President/Development

William L. Moore  
Vice President/Development  
Waikoloa Village Association

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NOTICE: THIS MESSAGE IS UNCLASSIFIED DATE 11/19/01 BY 60322 UCBAW/STP/STP



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95 DEC -7 P2:05

December 5, 1995

OFFICE OF ENVIRONMENTAL QUALITY CONTROL

Mr. James Anderson  
RUST Environment & Infrastructure  
5343 North 16th Street, Suite 400  
Phoenix, Arizona 85016

RE: HAWAII STATE HIGHWAY 200 - SADDLE ROAD PROJECT,  
HILO TO MAMALAHOA HIGHWAY  
ENVIRONMENTAL ASSESSMENT AND NOTICE OF PREPARATION OF  
AN ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Anderson:

We have reviewed the Environmental Assessment and Notice of Preparation of an Environmental Impact Statement for the Hawaii State Highway 200 (Saddle Road) Project. At this time, our comment is that we believe the Environmental Impact Statement needs to address the impact of the increased traffic on Waikoloa Road and assess the improvements which will be required to ensure that this major mauka-makai connector will be able to handle the anticipated traffic, civilian as well as military.

145

Currently, the majority of troop and equipment movement between Kawiliha Harbor and the Pohakuloa Training Area utilizes Waikoloa Road, which was not built to accommodate convey traffic. Improvements to Waikoloa Road should include, at a minimum, paved shoulders, climbing lanes, and passing lanes to minimize the impacts on civilian traffic of these long, slow-moving convoys and also the probable increase in civilian traffic on the residents and businesses of Waikoloa Village and the Waikoloa Beach Resort.

45

Your consideration is appreciated.

Sincerely,

Ken Melrose  
Vice President, Development

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JAN 5 1998

OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

cc:

Office of Environmental Quality Control  
Okahara & Associates, Attn: William Moore  
Dept. of Transportation, Planning Branch, Highways Division, Attn: Kenneth Au  
U. S. Dept. of Transportation, Federal Highways Division, Attn: William Bird

**PUBLIC COMMENT SHEET**  
**Saddle Road Project**

Public Hearing  
December 11/13, 1997

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below to write out any comment you may wish to make. Please hand in your statement during this meeting or, if you prefer, mail to the address printed below. Although comments are welcome throughout the project development process, we would like to receive your initial comments by December 22, 1997.

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JAN 2 1998  
OKAHARA & ASSOCIATES, INC.  
KAILUA-KONA OFFICE

COMMENT OR STATEMENT

*See Attachments*

**SADDLE ROAD REALIGNMENT TESTAMONY**

Although done legally, the planning of the Environmental Impact Statement(EIS) was done, like with other projects that I have seen, to exclude the publics impute and community concerns. Impute for the Army, Enviro's, Business, and Community Associations were solicited. Yet, impute from the Hunting Community was not solicited and when given their impute was castrated from all others. It is a shame that the Federal Environmental Justice law doesn't apply here for the Hunters to file suit. This group(Hunters) is probably one of the most knowledgeable when it comes to the safety concerns and affects, realistic scientific concerns and affects, business concerns and affects, community concerns and affects, conservation concerns and affects, Hawaiian Native hunting and gathering concerns and affects and their short, long, and cumulative affects because of their diversity and their years of experience on and around the Saddle Road.

146

Okahara and Associates( Bill Moore and Ron Terry) have knowingly conspired with the USFWS(Brooks Harper, Elizabeth Sharpe, Robert Smith), USGS/BRD(Rick Waucershour, Jim Jacobs, Thane Pratt, Paul Banko) and the Army Corps of Engineering( Rimos Litas, Alvin Char) to give false information and statements, excluded participation, suppressed

Notice: Copies of all comments provided are available to the public under the Freedom of Information Act. This will include names, addresses, and any other personal information provided with the comments. Your comments will be considered with or without the following optional information (please print):

Name Ray K. Mizuba

Address 1227 Puhua Place, Hilo, HI 96720

Representing Self

Mailing address: Federal Highway Administration, Central Federal-Joints Highway Division, 555 Zang Street - Room 259, Lakewood, Colorado 80228 (Attention: Bert McCauley, IPD-16, Saddle Road)

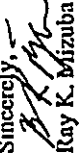
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146 scientific information, and exclude the hunting community's involvement and input. This has added to the Big Island community's feeling that the Federal Government is their enemy. I think this is called civil unrest and will lead to civil disobedience. The people of the Big Island will be opposing every Federal action and project/program that the Federal Government is and will be involved in. Having followed the process of the Saddle Road Realignment for the past two years, it has been shown that the planning process has been done by either incompetent or very bias people.

147 Some points being: A)the Hunting community has castrated from participating, B)the general public has not openly and completely informed about all of the project aspects and mitigation, all of the options for the road to be built with the Army's objectives along with the least amount of disruption, confusion, and mitigation(\$\$) were not analyzed, C)the public(??) meetings that only a select group of individuals( Enviro's, State DLNR, Hunters, Bill Moore and Ron Terry) which Brooks Harper and Elizabeth Sharpe called to try to get something for nothing and to add cost to the Saddle Road Realignment Project. These meetings, which I attended were basically a sham. There was no sincere intent or attempt to be fair or play fair with the Hunting community. This was evident when Brooks

Harper, Elizabeth Sharpe, Bill Moore, and Jon Giffin( DLNR/DIV Head) motioned and voted to ban the press( Bob Duerr, Hawaii Fishing News) for attending and reporting about the discussions at these public( ???) meetings. If the meetings were to truly help with this project then why wasn't the suggestion to "Stay out of the Palila Critical Habitat" rescinded and looked at as a viable option? The obvious route would have been one that stayed out of the Palila Critical Habitat and still was as far north as possible. Without the direct impact in the Critical Habitat, USFWS( Brooks Harper, Elizabeth Sharpe, Robert Smith) and USGS/BRD (Rick Wauersbauer, Jim Jacobs, Thane Pratt, Paul Banko,etc.) would not be able to extort the Army and the project.

148 Attached are just a few question I have after reading the Draft EIS and attending the public meeting in Hilo . This type of extortion and mismanagement must stop. I hope that my writing this testimony is not in vane and that there will be something done about the faults and false information contained in the Draft EIS.

Sincerely,  
  
 Ray K. Mizuba  
 1227 Puhau Place  
 Hilo, Hawaii 96720

*Saddle Road Project Written Testimony* 12/18/97

Here are just some of the questions that I have after reviewing the Draft EIS, and attended the Public Hearing in Hilo Hawaii on Dec. 13, 1997.

- 151 1. Why wasn't it shown that, "That it is more expensive to repave the existing road way, than it is to build a whole new one." (Bill Moore, at Big Island Bird Hunters Club meeting)?
- 152 2. Why weren't the combined affects of other Federal and State, on going projects and programs, in the Pohakuloa Training Area(PTA), Mauna Kea and Kaohle Game Management Areas described and analyzed for their combined synergistic affects?
- 153 3. Why didn't Ron Terry, who was hired by Bill Moore, include a fair and accurate analysis of the Game Mammal hunting that has and is currently occurring in the PTA specifically were the road way is proposed?
- 154 4. Why weren't any of the Game Mammal and Game Bird daily movement patterns and feeding habits included and analyzed in the Biological assessment or the Hunting sections?
- 155 5. Why wasn't the fact that hunting is and has been part of the PTA from the beginning and stated in the leases(1954 & 1957), and why wasn't a historical hunting summary done for the PTA?
- 156 6. Why was the excuse(ie) of no official records of hunting in the Kipuka Alaia and Bobcat areas included? These areas have always been designated as hunting areas, and have been used by military and civilian personnel for hunting. If the PTA command doesn't have any records of the they are in violation of the State lease.
- 157 7. Why weren't the users( military and Civilian) of units 1,2,3,4,10, & 11 asked for impute from the very beginning?
- 158 8. Why weren't the Hunters for the east and west sides of the Big Island consulted for roadway impute( safety, road conditions, hazards, etc.)?
- 159 9. Why isn't the roadway designed to handle 14,000 vehicles( daily estimated average in 2014)?
- 160 10. Why isn't the roadway designed for slow moving military convoys and civilian commercial and public traffic? Where are the slow moving vehicle lanes throughout the Saddle Road realignment?
- 161 11. Why isn't all of the safety issues and concerns for the total length of Saddle Road being addressed and taken cared off? Section III has

- 162 numerous hazards that are not to be fixed making the roadway even more dangerous than it is today.
- 163 12. Why aren't Stop lights, reflectors, warning lights, turn signals, guard rails, etc. included? When will they be included?
- 164 13. Why isn't all of the Palila mitigation outlined in detail with it's steps, bench marks, goals and objectives, cost, final price tag and outcome? Heaven forbid the mitigation is not agreed upon with everything in place and up front and not have any checks or balances.
- 165 14. Why isn't the Army's Palila mitigation held to only the PTA? Or does this mean that any mitigation the State is going through may apply to the PTA?
- 166 15. Why wasn't the scientific opinion( USFWS & USGS/BRD) backed up with factual data that supports their opinion that PTA #1 would make all of the above Palila's Critical Habitat uninhabitable/useless to the Palila species?
- 167 16. Why wasn't the Federal Endangered Species Act( Incidental Take/ Incidental Harm) used to protect an existing population of Palila and realign Saddle road?
- 167 17. Does the actions of USFWS and USGS/BRD and the State DLNR to create new populations of Palila mean that the Critical Habitat( as defined by Court Order) has reached it's natural carrying capacity?
- 167 18. Why isn't there any thing on the negative long term affects of the realignment relating to the environment in and surrounding the PTA?
- 45 19. Why were there no plans to deal with the safety hazards at the Waikoloa intersections( mauka and makai)?
- 169 20. If Military Base Access Funds are to be used for the Saddle Road Realignment, why isn't whole the road to the port( Kawaihae) and airport( General Lyman) being up graded for military access with civilian traffic?
- 170 21. Who will be responsible for maintaining the roadway once this project is completed?
- 171 22. Why weren't alternate route looked at which would have stayed out of Palila Critical Habitat? The road could parallel the Palila Critical Habitat.
- 172 23. Why wasn't a trade for "Trail One" looked at in which the State would trade more range adjacent to the PTA, on Mauna Loa for military maneuvers?
- 173 24. Why doesn't the roadway fencing through the PTA allow for emergency pullouts for accidents, breakdowns, and flat tires?

- 174 25. Why haven't the astronomy community (Mauna Kea and Mauna Loa) been consulted with for the future impact of 14,000 vehicles daily on their night research?
- 175 26. Why wasn't the direct, current, and future negative impacts of the realignment on hunting in the PTA shown.
- 176 27. Why wasn't it shown in detail in the Draft EIS where the funding for all of the realignment and mitigation's will be coming from?
- 177 28. Why isn't the Public Review Period made longer? Having only four copies in Hilo, all of which can not be borrowed, making it extremely hard for the general working public to review the eight volumes and accurately respond to the Draft EIS.
- 178 29. Why wasn't the importance of Hunting (a lifestyle and American heritage), and it's game animals and lands treated with the honor it deserves? Hunting is one of the cornerstones in our past and present day American society.

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JAN 2 1993

OKAHIKA & ASSOC., INC.  
KAILUA-KONA OFFICE

December 10, 1997

FIHWA (HPD-16)  
555 Zang Street, Room 259  
Lakewood, CO 80228  
Attention: Mr. Larry C. Smith, Division Engineer.

Dear Sir:

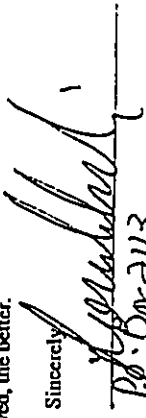
I am all for developing and improving the Saddle Road. This island is like a third-world country with only one two-lane road to access the other side of the island. My only wish is that it would be a four-lane highway. Many people have family or business on the other side of the island, and they are confined to traveling on one road that is adequate. In case of a natural disaster (high volcanic activity), there would be great difficulty evacuating people.

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At the public meetings there will be vocal people which the locals call "cave people." This stands for "citizens against virtually everything." No matter what improvement is presented, these cave people scream and yell. Meanwhile, the rest of us citizens are made to suffer for it. The Saddle Road must be improved for the good of all the people, not just a few. The more improved, the better.

Sincerely,

  
P. O. O'Neil  
Keaau, Hi. 96749

*Suggestions As a small business owner, the improvements would save me time and money. Mikielo!*

access on Mana road is already a burden. We are continuously required to deal with the affects of public access on Mana road. The following is a list of the problems we have encountered as a result of access by the public on Mana road:

a) For the past four years we have been the sole maintainer of the section of the road that passes through K.K. Ranch. The county has not maintained the road for the past four years and the State has not maintained the road for at least the past seven years.

b) Trespassers have:

- cut fences
- broken water pipes
- shot holes in one of my water tanks
- broke into house/cabin
- stolen property
- poached
- harassed/frightened livestock
- rustled cattle

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c) Police and DLNR enforcement personnel do not patrol the area and on several occasions we have had to confront armed poachers and other trespassers.

d) The proposed road would pass within 50 foot of a house/cabin on the lease which we routinely use. K.K. Ranch has had this cabin broken into and damaged several times. We have had food and tools stolen from this cabin.

e) We continuously pick up litter, (beer bottles, cans, paper, etc.)

f) People defecate on or near the road.

g) On one occasion two rabbits were found on our pasture adjacent to Mana road, obviously released by someone. After several attempts to catch these rabbits, they were destroyed.

h) Dogs left by hunters become feral, pack and either destroy or cripple my calves every year.

i) I have had cattle and horses harassed and injured by dirt bike riders.

j) We have lost thousands of gallons of water as a result of 4-wheel drive vehicles leaving the public road and running over my pipes.

Where public access occurs along the road in the Mauna Kea GMA similar problems occur in the Mauka portions of the ranch. During the bird hunting seasons especially, our entire cow herd has been driven to the bottom of our pastures as a result of groups of hunters trespassing over the boundary fence and poaching in K.K. Ranch's Mauka pastures. On several occasions during the bird hunting seasons younger cows from this herd have abandoned their calves after such an incidence.

K.K. RANCH INC.  
P.O. BOX 428  
PAUHOLO, HI 96776  
808-775-0251

December 20, 1997

TESTIMONY ON DRAFT EIS FOR PROPOSED IMPROVEMENTS TO THE SADDLE ROAD.

Comments are specific to the pollution mitigation plan as they affect K.K. Ranch (Portion of IMK 4-4-14:2 & all of 4-4-14:3).

The proposed resource management guidelines for the lands in the Puu Mali area on Mauna Kea indicate that the mitigation process will request that the Department of Land and Natural Resources (DLNR) withdraw approximately 2170 acres from K.K. Ranch's 7200 acre lease.

K.K. Ranch has several concerns/objections concerning the proposed resource management guideline in regard to its' affect on K.K. Ranch.

1) As currently written on line 2 of Table 7, page 31 "Estimated Biological Mitigation Costs for PTA-1", \$500,000 per unit appears inequitable when considering K.K. Ranch has more acres involved than S.C. Ranch and more productive acres involved than Botelilho (Majority of Botelilho in lava).

2) The proposed, fenced 100' roadway through K.K. Ranch at its present location appears to be a unnecessary expenditure of funds, and would disrupt K.K. Ranch operations if constructed in the proposed location.

Although historical maps may show a four wheel drive road in that location, it is no longer used and is impassable. Constructing a fenced road in that location would in essence cut off an additional 250 to 300 acres from K.K. Ranch. No watering infrastructure is located in the corridor that would be created between the roadway and the ranch's east boundary. Cattle grazing that paddock currently are required to walk from the east boundary westward for water.

Upon request K.K. Ranch has made another road further west on the lease available to DLNR and United State Geological Services-Biological Services (USGS-BL) personnel for their access to the Mauna Kea GMA. If more routine use of the road would be made assistance with maintenance of this road would be required.

If the purpose of this road is to allow more than service personnel access to the Puu Mali area, i.e. public, we object to having such a road bisect K.K. Ranch. Such a road would significantly affect the quiet enjoyment afforded K.K. Ranch by General Lease E-4475 and would severely disrupt ranch operations. As an example, public

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3) The last paragraph, page 26, of the Falla Mitigation Plan indicates that discussions with lease holders is incomplete. To date discussions had have not produced a satisfactory compensation plan for K.K. Ranch. Reduction in lease and compensation for depreciated value of permanent fixtures have been brought up by DMR. Compensation at that level alone does not address loss of the breeding cow herd that would be displaced and loss of the value of that herd's calf crops over the duration of the remainder of the lease. With out adequate compensation for the displaced cow herd and the herds calf crops over the duration of the remainder of the lease, there would be no way for K. K. Ranch to remain solvent.

181 Prior to accepting a withdrawal of the 2170 acres the following will need to be addressed to the satisfaction of K.K. Ranch.

- a) Reduction in lease payment comparable to the value of the land being withdrawn in relationship to the remainder of the lease. (the 2170 acres in question carries 40% of K.K. Ranch's cow herd)
- b) Compensation for the loss of permanent fixtures. If exchange lands can be found and the 400 cows are relocated, replacement value will be required to start up again, not depreciated value. If the 400 cows are disposed of, then depreciated value for fixtures would be acceptable, however compensation for lost breeding value of the displaced cow herd and not cull value would be required.
- c) Compensation for loss calf crops over the duration of the remainder of the lease would also be required.

4) The 400 meter wide managed grazing paddock proposed for the west and east boundaries would require costly water infrastructure for grazing to occur there. There is no water infrastructure in those areas. Cattle currently grazing these areas are serviced by water systems that are located in the center of the present paddocks.

We believe there has been no enclosure studies which involved cattle and Mamane. The only studies we have seen involved goats and sheep. Results of those studies should not be used to make determinations as to the effect of controlled rotational grazing of cattle and its affect on Mamane. It has been our experience over the past seven years that rotation of our mauka cow herd out of a grazed paddock prior to complete depletion of grass results in no damage to mature and young mamane trees, including young shoots and rhizomes growing near the base of existing trees. We have also had experience successfully grazing cattle in young Koa stands, a tree that is much more palatable to cattle than Mamane. It is our recommendation that existing paddocks be kept in tack and controlled grazing be offered once annually to those ranchers who have had their lands withdrawn, for the purpose of fire control. Cattle should be placed in the paddocks at peak grass production times (April through July) and removed in advance of grass depletion.

In conclusion, we feel that further discussions are necessary in

order to satisfy all parties. If there are any questions that we can answer please contact Jason Moniz at 808-775-0251.

Thank you for your time.

*Jason D. Moniz*  
Jason D. Moniz

*Josephina Deluz*  
Josephina Deluz

*David Deluz, Sr.*  
David Deluz, Sr.

*Josephina Deluz*  
Josephina Deluz



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DEC-28-87 13:05 FROM: FED HIGHWAY

ID: 008 641 2784

PAGE 1/3

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DEC 29 1997

FEDERAL HIGHWAY

December 20, 1997

Philip Mosher  
P.O. Box 1874  
Kailua-Kona, HI 96745

RECEIVED  
JAN 2 1998

FHWA  
Attention: Mr. Abraham Y. Kong  
Division Administrator  
300 Ala Moana Blvd. (Box 50206)  
Honolulu, HI 96850

Dear Mr. Wong,

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

I have reviewed as much of the information on the proposed Saddle Road project as I could assimilate. I also found the SADDLE ROAD PROJECT BULLETIN helpful. The first question which comes to mind, is there going to be a military build up at the Pohakuloa Training Area? I was surprised to learn that there was so much "live fire" taking place at the training area, which is an environmentally sensitive area. I believe that Saddle road is presently an unsafe roadway and should be improved and widened in certain places to allow passing.

183

121

The people of the Big Island as well as tourist need to pass between East and West Hawaii. We are not willing, however, to do this at the cost of Hawaii's fragile eco-system. The concept of re-locating the habitat of the endangered Palila to a new area is not a credible alternative. This species will perish. We must also protect historic archaeological sites. The proposed new road would surely destroy these sites. It is imperative that we respect Native Hawaiian sacred areas such as the Mamane forest and kipuka.

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Arguments that this road will solve all of East Hawaii's economic problems do not hold water. It is not rational to have East Hawaii drive to West Hawaii to work. In the present economic crunch it is not viable for the State of Hawaii to spend untold millions on this project. Make the present road safer, and we can continue to use Hamakua Highway.

Thank you for your consideration.

Sincerely,

*Philip Mosher*

Philip Mosher

FAX TRANSMITTAL  
12/29  
To: Bert McLeney  
From: Glenn  
808/541-2700  
1505 889-5703  
FAX  
COMMUNICATIONS ADMINISTRATION

Public Hearing  
December 11/13, 1997  
Saddle Road Project

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below to write out any comment you may wish to make. Please hand in your statement during this meeting or, if you prefer, mail to the address printed below. Although comments are welcome, only initial comments by December 11/13, 1997 will be considered. Submit the following optional information (please print).

RECEIVED  
JAN 2 1998

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

COMMENT OR STATEMENT

28, 47 I cannot agree with PTA - 1 and support EX - 2. According to the EIP, the military designated training areas 1-4 are biological significant areas and are not supposed to train in that area. So why do we need to realign the critical habitat through that area?

32

29

Comments of all commenters are available to the public under the Freedom of Information Act. This will include names, addresses, and written comments. Optional information provided with the comments will be considered, but not published. Submit the following optional information (please print).

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QUESTIONED  
Saddle Road Project  
Public Hearing  
RECEIVED  
DEC 11 1997

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

NAME: Harold Murata  
ADDRESS: HALE KONA KAI #207 KAILUA-KONA 96740

REPRESENTING: SELF  
QUESTION: WHAT % OF THE TOTAL PROJECT COST IS PAID MITIGATION PREPARED? BREAKDOWN BY TYPE

189

57, 47, 29

Alan Nakagawa  
P.O. Box 1825  
65-1156 Spencer Road  
Kaimula, Hawaii  
ph: 808-895-7764  
email: anakagaw@interpac.net

RECEIVED  
JAN 2 1998

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

To: Mr. Kazu Hayashida, HDOT  
Mr. Larry Smith, FHWA  
Mr. Abraham Wong, FHWA

Dear Sir,

The following are my comments that are being submitted for consideration during the DEIS review.

1. Mitigation for Palia Habitat:

I strongly oppose any mitigation for Palia Habitat and urge the planning committee to suspend any considerations of construction within any of the Federally designated Palia Critical Habitat. The construction of PTA-1 or PTA-3 would add over 15 million dollars to the overall cost of the project. Some would say that 15 million dollars is a small price to pay to save an endangered species such as the Palia. I would certainly agree if the expenditure of 15 million dollars would guarantee that the Palia would indeed survive and increase their numbers. Over the past two years I have attended numerous meetings with the U. S. Fish and Wildlife, PTA Environmental Office, National Biological Survey, and numerous environmental groups. Through these meetings I have learned that there is little if any accountability were endangered species are concerned. The only real outcomes of such excessive expenditures in the name of environmentalism is economic ...the creation of jobs and job security for those who claim to be the "experts".

The protection and restoration of 9,345 acres of Mamane forest associated with Palia mitigation will help compensate for the loss of sacred Mamane forest along saddle road" is ludicrous. For one, if the land was so "sacred" why is the USFWS so eager to forfeit this land. It is my understanding that Palia have never been observed (and verified) in this Critical Palia Habitat. Substantial Palia habitat has already been secured as most of Mauna Kea (all of Units A, G and K, over 80,000 acres) has been fenced and the feral sheep, mouflon sheep and goats have been eradicated. Millions have been spent for fencing, eradication, biological surveys, research and environmental assessments on Mauna Kea. It has been over twenty years since the process of eradication has taken place and the numbers of Palia has not increased nor has their range expanded. Who, in the end, is being held accountable for all of the millions that have been and will be spent with no visible outcomes.

190 2. Aesthetic Value of the "Saddle":

The construction of "additional 8-foot paved fire break separated from the 8-foot shoulder by a wire fence and curb" seems to be contradictory to providing "visually pleasing

191

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P. 001

It is my understanding that a mitigation plan for hunters has been submitted to Mr. Bill Moore or Okahara & Associates, but I see no mention of the mitigation plan in the Project Bulletin.

Thank you for giving me the opportunity to provide comment on the Saddle Road Project; although I do feel that there should be improvements to the Saddle Road I also feel that the needs of the military and other economic concerns should not overshadow the environmental needs of the area.

Alan Nakagawa

P. 002

The aesthetic value of the "saddle" roadside facilities and "encouraging visitor use". The aesthetic value of the "saddle" cannot be put into words, it is unique and cannot be replaced. Why would visitors want to travel a roadway bordered by fence barriers and paved fire breaks? An example of what is to come can already be seen as the military has recently installed "dip tanks" as part of their fire management plan. These metallic tanks can be seen from miles away and creates a disruption to the natural landscape. These things seem to be inconsistent with a visually pleasing road.

3. Hunting Opportunities:

Two benefits to hunters are noted as being the addition of "hunting lands and better access to existing areas" and "hunters will be actively consulted in management of Critical Habitat". Again, there are inconsistencies with the statements that are being made. On one hand they mention increased hunting on the other they talk of eradication and fencing.....eradication and hunting do not go hand in hand no matter how you look at it.

The plan also fails to mention other plans of the USFWS to fence the entire northeastern section of PTA and eliminate feral animals from the enclosed area. Kipuka Alala is part of this plan. When this takes place there will be tremendous negative impacts on the feral sheep, goat and pig populations in the adjoining Game Management Areas (Puu'Ariahulu). The selection of Kipuka Alala seems to have been based more on the fact that it will be located next to an existing fenced area (and therefore can be incorporated into a larger fenced area) more that its potential for Palila habitat.

In the past, meetings with environmental groups and government agencies such as the USFWS have not been productive for the hunters. Although consultation may take place - it is the value that they place on that consultation that will make a difference. Over the last twenty years many hours have been spent (consultation) and very little has been accomplished (no value) other than more eradication and more fencing.

4. Section 1 Alignment:

Within Section 1, I would like the planning committee to consider the existing saddle road that will improve travel to the Waimea, Kohala and Kawaihae areas. The use of the existing roadway would also minimize disruption to the environment and any endangered plant species that exit in W-3 and W-2. The existing roadway would also have less of an impact on the Waikii Subdivision.

5. Speed limits:

Designing a road through the saddle for 50-60 mph traffic seems to defeat the original intent of this project to increase motorist safety. The road can certainly be engineered and designed for these speeds but there is little that can be done about the severe and unpredictable weather conditions within the saddle area. Increased speeds will increase the number and severity of accidents on this road. Lower speed limits and more enforcement of limits will be needed.

6. Mitigation for loss of hunting areas:

P. 003

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December 11, 1997

**KONA-KOHALA CHAMBER OF COMMERCE**

Mr. Bert McCauley  
Environmental Planning Engineer, Federal Highway Administration  
U. S. Department of Transportation  
555 Zang Street, Denver, CO 80229

RECEIVED  
JAN 2 1998  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Dear Mr. McCauley:

The Kona-Kohala Chamber of Commerce is in favor of the improvement to the Saddle Road for safety and military training reasons. We agree with the purpose of the project to provide a safe and efficient route for access to and between land uses along Saddle Road and for cross-island traffic between East and West Hawaii. Many of our members and staff use this roadway as a commute between Kona and Hilo and we feel the roadway deficiencies are very dangerous. Although we have no position at this time, we are leaning toward PTA 1 and W2. PTA 1 would satisfy the need for more appropriate training for the military, which is why this roadway is being improved. Increased training efficiency is important in supplying these soldiers with the tools to keep peace and to stay alive.

If either W2 or W3 is chosen, we hope serious consideration will be given to the installation of intersection safety features, such as a traffic light or an over/under pass. The driver will be on a ribbon of concrete with very little interference for a long time and will come to Mamelahoa Highway unprepared for either cross traffic or the narrow two-lane highway.

We would also like to commend Federal Highways and the team they assembled for the very extensive information and opportunities for comment they provided the general public. We feel the information was very extensive and well presented and all had the opportunity to comment and present their viewpoints. The public meetings were conducted in an organized and courteous manner and we are grateful for that. Thank you for this opportunity to comment and we look forward to the completion of this project...in the near future.

Sincerely,



Kenneth T. Ono, Chair  
Kona-Kohala Chamber of Commerce

75-5737 KUAOHAE HWY., SUITE 207, KAILUA-KONA, HI 96740 • (808) 328-1758 FAX (808) 328-4564

QUESTIONCARD  
Saddle Road Project  
RECEIVED  
JAN 11 1998  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

NAME: KEN ONO  
ADDRESS: CAPT COOK  
REPRESENTING: SELF  
QUESTION: Please address the issue raised about trading 100 acres for 10,000 acres for the Mauck Habitat.  
THANK YOU.

29

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JAN 3 1997

HAWAII

Mr. Larry C. Smith  
Division Administrator  
Federal Highway Administration  
555 Zang Street, room 259  
Lakewood, CO. 80228  
December 10, 1997

RECEIVED  
JAN 2 1993

OKAHANA & ASSOC. INC.  
KAILUA-KONA OFFICE

December 03, 1997

Mr. Abraham Y. Hong  
Division Administrator  
FHWA  
P.O. Box 50206  
300 Ala Moana Blvd.  
Honolulu, HI 96850

Dear Mr. Smith;

I thank you for the opportunity to comment on the draft E.I.S. for the proposed amendments to the Saddle Road, Island of Hawaii.

My perspective is that of a 25 year island resident of the Hilo side. I have an interest in the Saddle Road from my many years as an outdoorsman, hiker and hunter and have a primarily recreational bias.

I believe certain improvements to the Saddle Road would be beneficial to all residents, while other proposed "improvements" would be of benefit primarily to motorists and to the U.S. Military, while being a detriment to the very nature and spirit of the Saddle road area and those of us who see this area not as a dry upland to be traversed as quickly as possible, but as a recreational destination of profound beauty and spiritual rejuvenation.

I won't bore you by trying to explain my position as an outdoorsman, but suffice it to say that by widening and improving the existing saddle road corridor, the greatest benefit will be derived by all Hawaii residents, not tourists, the U.S. Army or other short term users.

The Saddle area is a unique part of Hawaii. A dry upland of great beauty and many moods. I have camped with my family and friends up there every year for the last 18 years and have always found the experience to be memorable and most refreshing.

I believe specifically that the proposed re-alignments in sections I & II, (most specifically II) would be of the greatest detriment to an area already feeling the weight of use by the Military. I further believe that proposed re-alignments will not save motorists any appreciable time, and merely add to further scarring of the area while rendering areas slated for use in the re-alignment hostage to traffic noise, litter and the sight of yet more automobiles crawling over areas which were once splendid vistas,

199

The following are my comments,

- 38 Section I: Alignment N-2 is the best alternative
- 197 Section II: If budgeting is a problem Segment EX-2 would be the most desired improvement
- Section III: Sounds OK
- 198 Section IV: Segment EX-4A is the best alternative

*Sheppard Orama*

Stafford Orama  
31 Honi Place  
Hilo, HI 96726  
(808) 953-4575 X389(B)

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water ration  
27-703 Kalelo Rd.  
Papaikou, Hawaii 96781

12-15-97

Mr. Kazu Hayashida Director  
HDOT  
869 Punchbowl Street  
Honolulu HI. 96813

Dear Mr. Hayashida

RECEIVED  
JAN 2 1998

OKAIHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

I reluctantly take the time to write to you with suggestions for the Saddle Road Improvement project. First the idea of correcting saddle road is long over due and will be a needed improvement. I hope some serious considerations are given to my suggestions which would make the project a great project. In my humble opinion development must be encouraged at every opportunity in Hawaii. The economic outlook for Hawaii and particularly the Big Island of Hawaii are dismal. This road improvement could if all possible ingredients are included would make a long term and permanent improvement.

My suggestions are simple and quite expensive and are a key element in the Saddle Road Project achieving maximum impact on our community. During the construction and realignment a large water Pipe and huge underground electric service cables should be installed. With the inclusion of these utilities development would be possible for future growth. Over head wires would be OK if the cost for under ground is out of sight. The water pipe is the most important element. If Hilo side were to negotiate with Halco to get electricity cheap during late night hours when no one is using electricity and the rates could be much lower we could pump water up the hill all night and let gravity take it to new farmers on the Kona side with lots of land and no water. If adequate electricity were available more development could occur in this most remote and beautiful area of the Big Island. I know that what I am suggesting would slow the project down for the planning and the ideas will be costly. The ideas will be a lot cheaper to implement now rather then later.

Thanking you in advance for your considerations and my prayers for your good judgment will be with you.

CC. Mr. Larry Smith.  
A.Y. Wong.

Thank you, Walter Watts *Watts*

empty of the sights and sounds of people and machines. Scenes which are increasingly rare in Hawaii and worthy of preservation.

So I support road widening, and improvements to the shoulder, improvements which will benefit us all. I do not support re-alignment projects that will sacrifice the natural beauty and peace of the area on the altar of speedy comfortable commuting, widening the existing road will do that nicely.

The Army already uses the highways from Kawaihae to get to the area, re-alignment will not alter that fact, nor the fact that sometimes people may get stuck in traffic behind a slow military convoy. What are the chances of having that happen to the same person more than once? I don't think carving up the saddle and changing things un-alterably up there is worth that.

Sincerely, *David Parry*

David Parry  
hcr-1 box 4012  
Kaaau, HI. 96749

cc:  
Mr. Abraham Y. Wong, Honolulu, HI.  
Mr. Kazu Hayashida, Honolulu, HI.

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December 10, 1997

FHWA (HPD-16)  
555 Zang Street, Room 259  
Lakewood, CO 80228  
Attention: Mr. Larry C. Smith, Division Engineer.

RECEIVED  
JAN 2 1998

OKAHAKA & ASSOC., INC.  
KAILUA-KONA OFFICE

Dear Sir:

I am all for developing and improving the Saddle Road. This island is like a third-world country with only one two-lane road to access the other side of the island. My only wish is that it would be a four-lane highway. Many people have family or business on the other side of the island, and they are confined to traveling on one road that is adequate. In case of a natural disaster (high volcanic activity), there would be great difficulty evacuating people.

36

At the public meetings there will be vocal people which the locals call "cave people." This stands for "citizens against virtually everything." No matter what improvement is presented, these cave people scream and yell. Meanwhile, the rest of us citizens are made to suffer for it. The Saddle Road must be improved for the good of all the people, not just a few. The more improved, the better.

203

Sincerely,

Mrs. Geraldine B. Baskin  
H.C.B. 1 BOX 5314  
Kaunoi, HI 96749-9520

December 10, 1997

FHWA (HPD-16)  
555 Zang Street, Room 259  
Lakewood, CO 80228  
Attention: Mr. Larry C. Smith, Division Engineer.

RECEIVED  
JAN 2 1998

OKAHAKA & ASSOC., INC.  
KAILUA-KONA OFFICE

Dear Sir:

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203

Sincerely,

Wanda Perbeck  
P.O. Box 2113  
Kaunoi, HI 96749

204 Suggestion: Road Forked on West Side

2. EXIT ROAD - Leolaima - Leolaima  
Essentially a South Extension to Kaunoi

Suggestion: Being a teacher and small business

owner, the Saddle Road improvements would save me  
time and money. As it is now I need to go completely  
205 around one side of the island on a two-way road, to get  
to the other city on our island. We also need amenities on  
Saddle Road such as gas stations and public rest stops.  
Also at this time car rental agencies have strict policies spelled  
with the name of the station. I think that is a mistake on the part of the



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JAN 2 1997

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

December 10, 1997

FTIWA (LUD-16)  
555 Zang Street, Room 259  
Lakeview, CO 80228  
Attention: Mr. Larry C. Smith, Division Engineer.

Dear Sir:

I am all for developing and improving the Saddle Road. This island is like a third-world country with only one two-lane road to access the other side of the island. My only wish is that it would be a four-lane highway. Many people have family or business on the other side of the island, and they are confined to traveling on one road that is adequate. In case of a natural disaster (high volcanic activity), there would be great difficulty evacuating people.

36

At the public meetings there will be vocal people which the locals call "cave people." This stands for "citizens against virtually everything." No matter what improvement is presented, these cave people scream and yell. Meanwhile, the rest of us citizens are made to suffer for it. The Saddle Road must be improved for the good of all the people, not just a few. The more improved, the better.

203

Sincerely,

*John Redick*  
HCR-1-Box 5314  
KONA, HI 96749

204 *Suggestions: Road Forked on West side -  
2 Exits - 1 to Waimea - 1 to Kona.  
Eventually a South Extension to Kona*

*In addition, many visiting scientists from around the world and visitors would have a better access to one of the main astronomy centers in the world. Maunaloa!*

97024  
CDKO  
Hilo File

For the Protection of Hawaii's Native Wildlife  
**HAWAII AUDUBON SOCIETY**  
830 RICHARDS ST., SUITE 303 • HONOLULU, HI 96813-4109  
TELEPHONE (808) 512-1413 FAX (808) 517-5794



December 20, 1997

Mr. Bert McCauley  
U.S. Department of Transportation  
Federal Highways Administration  
555 Zang Street, Room 259  
Lakewood, Colorado 80228

implementing mitigation measures short of recommendations by USFWS personnel that recovery efforts should begin as soon as possible with suitable habitat for initial translocation efforts to be made ready in the next twelve months. A detailed discussion of how these concerns will be addressed is needed before any FEIS. In short, the MOA for the Palila plan and the final Record of Decision must have ironclad provisions to ensure that net gains of Palila critical habitat are in fact made.

Again, the Society strongly supports the full implementation of the Palila Mitigation Plan as initially proposed, but we are extremely cautious of mere assurances that proposed mitigation measures will be honored.

Impacts of Alien Species Following Fragmentation of Native Habitat

A fuller discussion is needed of the effects generated by the bisection of native forest and shrub land habitat. Edge effects from light, noise and the introduction of alien species will extend far further than the construction corridor. Additionally, roads are notorious avenues for the spread of ants and rodents given the presence of trash at parking areas, trail heads, scenic pullouts and in the PTA area, discarded MREs. Long-term mitigation and education efforts beyond the construction period are needed to prevent the further degradation of any native ecosystems impacted by the road. Funding for such long-term efforts could be financed by requiring toll fees for use of certain sections or the entire length of the road once construction is completed.

Appropriate Areas of Public Access

We are further concerned that the considerable natural resources along the Saddle Road will not be readily accessible for appropriate public enjoyment and use. Attention needs to be given to providing suitable scenic pullout areas and parking for allowable recreational uses. By not providing appropriate areas for these uses (coupled with the necessary mitigation measures), road users will stop at inappropriate areas and only contribute to the degradation and not the conservation of the area's natural resources.

Thank you for the opportunity to comment at this stage. We hope that the above concerns will prove useful to the planning process. The Hawaii Audubon Society is a non-profit organization committed to the protection and conservation of native ecosystems through advocacy and education.

Sincerely,

*Daniel K. Sailer*  
Daniel K. Sailer  
Conservation Chair

cc: Mr. Kenneth Au, HDOT  
Mr. Donald Okahara, Okahara and Associates  
Mr. Gary Gill, OEQC

207

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209

The following comments are in regards to HPD-16E, the Saddle Road Draft Environmental Assessment (DEIS), FHWA Project No. A-AD-6(1).

General Comments

The Hawaii Audubon Society expresses its general support for the project as outlined in the DEIS if the project can guarantee a net gain of suitable Palila habitat. We cannot recommend a particular route at this time as many of the social concerns affecting route selection are beyond the scope of the Society's conservation interests. However as a general policy, the Society does not condone the destruction of critical habitat for any endangered species, nor do we condone the destruction and fragmentation of intact native ecosystems. Should PTA-1, or PTA-3 be selected, we do wish to express our strong support for the overall mitigation measures as outlined, as well as the Palila mitigation plan in particular to offset the irreversible ecological impacts of road construction.

We also have the following questions and concerns that remain unanswered by the DEIS.

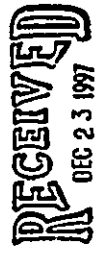
Palila Mitigation Plan

Of primary concern is the financing structure for the Palila Mitigation Plan. As it is probably unknown how many Palila populations can be successfully re-established in formerly suitable mamane forest habitat, we strongly support the acquisition and restoration of as much mamane forest land as financially possible. For long-term recovery efforts to succeed, large enough areas with wide enough elevation ranges are required for Palila to seasonally utilize available food resources. However, the high cost of the Palila Mitigation Plan places the package at risk of not being fully implemented.

To avoid any net loss of critical Palila habitat, how will funding for the full Palila Mitigation Plan be guaranteed if the project is constructed incrementally? Will mitigation funds be tied solely to each separate segment, with Palila restoration efforts to run only concurrently with the impacts from constructed segments? What is the tentative timetable for implementing the Palila Mitigation Plan? A timetable for project implementation is included in the DEIS, yet no mention is made of

206

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DIR 108

1987 Uhafoa Rd.  
Hilo, HI. 96720  
Nov. 27 1997

H. D. O. T.  
869 Punchbowl St.  
Honolulu, HI. 96813

Dear Mr. Kazu Hayashida, Director;

38 I am writing in regards to the Big Island Saddle Road Project. In Section 1, there are two proposals to join Mamalahoa Hwy. to the Saddle Road (W-2 and W-3). I strongly recommend that proposal W-3 be dropped and W-2 be adopted.

I feel that W-3 will only benefit some people going from the Saddle Road to Kona and back. It will be an inconvenience for those in Waikoloa and below or for those in Waimea to Hilo since they will have to travel farther to reach the new road. Furthermore, I do not like to use the Mamalahoa Hwy. in going to Kona, since it is so narrow and dangerous. I understand that there are plans to put in a new road from the intersection of W-3 and Mamalahoa Hwy. to the Queen Kaahumanu Hwy., but if it takes 30 years to improve an already existing road (Saddle Road), just imagine how long it will take to build a new one!

W-2 only the other hand, gives the Waimea travelers a much better compromise to Saddle Road, gives the Waikoloa residents a straight shot up to the Saddle Road, and give the Kona travelers much easier access to a safer road (Queen Kaahumanu Hwy.) than the Mamalahoa Hwy.

Sincerely,



Byron Sako

DEPARTMENT OF TRANSPORTATION  
HIGHWAYS DIVISION  
PLANNING BRANCH  
DEC 2 11 07 AM '97



# W.H. SHIPMAN, LIMITED

KEAAU  
HAWAII ISLAND

December 10, 1997

**RECEIVED**  
DEC 11 1997

Federal Highways Administration  
555 Zang Street  
Lakewood, Colorado 80228

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Gentlemen:

Re: Saddle Road Environmental Impact Statement  
Public Hearings - December 11/13, 1997

1 My name is Robert E. Saunders, and I am President of W. H. Shipman, Limited. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, and believe that the document addresses all possible community concerns and technical information.

36 Frequently myself or members of my staff have to attend meetings in West Hawaii. With the improvements to the Saddle Road our travel time will be cut down and the safety factor will be greatly improved. We are looking forward to a Saddle Road that connects East and West Hawaii Island with greater efficiency and safety.

Thank you for the opportunity to submit these comments.

Sincerely,



Robert E. Saunders  
President

P.O. Box 950  
Kona, Hawaii 96719

"A Kamaoia Company Contributing to the Planned Growth of Hawaii"  
Established 1923

Phone (808) 966-8115  
Fax (808) 966-8112

H. SCHAT  
BLUE MOUNTAIN HOUSE  
P.O. Box 303066  
Honolulu, Hawaii 96830

Tel: (808) 863-8320  
Fax: (808) 863-8020

Federal Highway Administration,  
Box 50206,  
300 Ala Moana Boulevard,  
Honolulu, Hawaii 96850.

Attention: Abraham Y. Hong, Esq. Division Administrator.

Gentlemen:

This is to acknowledge receipt of the so-called Saddle Road Project Bulletin, which was received in the mail by Waikoloa residents one day before the public hearing scheduled for Thursday, 11 December 1997 - presumably in an effort to discourage the public from attending the meeting since such short notices usually prevent people from attending.

Please note that we are opposed to any changes whatsoever to the current Saddle Road and, therefore, support the so-called No Action Alternative. Briefly, we have not settled here almost two decades ago to see this area degenerate into the mess on Oahu or increasingly on Maui, which feeling would certainly be representative of the vast majority of the people in Waikoloa.

Very truly yours,



Harry H. Schat

cc: Federal Highway Administration,  
(HPP-16), 555 Zang Street, Room 259,  
Lakewood, Colorado 80228.  
Attention: Larry C. Smith, Esq.  
Division Engineer.

Hawaii Department of Transportation,  
869 Punchbowl Street, Honolulu, Hawaii 96813.  
Att.: Kazu Hayashida, Esq. Director.



Fertilize in 2000

HHS/nl



Dennis K. Shigolev, P.E.  
Licensed Civil in Hawaii and Arizona

December 15, 1997

HIWA  
300 Ala Moana Blvd.  
P.O. Box 50206  
Honolulu, Hawaii 96850

RE: Draft EIS - Saddle Road Project

OKAHAKA & ASSOC., INC.  
KAILUA-KUNA OFFICE

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OKAHAKA & ASSOC., INC.  
KAILUA-KUNA OFFICE

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HAWAII DIVISION

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This is to follow-up to my oral testimony at the public hearing held in Kilo on December 13, 1997. I wish to state my comments with back-up data.

I have also been very actively involved with the Saddle Road realignment having been a past chairman for the Hawaii Island Chamber of Commerce's - Saddle Road Ad-Hoc committee formed during the early 80's. The committee's objective at that time was to encourage the state to take over Saddle Road for inclusion with state highway planning and have Saddle Road be declared as a "Major" highway. I also use Saddle Road often for travel to the other side of the island and find it to be truly unique in beauty, climate and calming effect while traveling through its differing plant zones. Regrettably, due to its present condition - travel is frustrating and physically trying.

1. TIMING:

I commented that this Draft EIS & beginning of the design and construction be undertaken at the most earliest without delay. Urgency is stressed to help economic conditions with design and construction work for the people of Hawaii. I also want this project to proceed quickly to fix the deplorable existing condition of the roadway. It is very dangerous and poorly maintained.

TECHNICAL SUGGESTIONS:

Recommend that climbing lanes be integrated into planned shoulder and firebreak areas of the pavement section with proper signage. No change to the roadway prism as planned is required. However, with proper signs - truck and slow traffic can safely pull to the sides and let other traffic pass by. These climbing lanes are especially needed in Sections I, & IV.

Recommend the addition of frequent solar or battery powered emergency phones at suggested view turnouts and stopping areas. These phones can be installed by the many new telecommunication wireless companies and allow them to advertise on the stands.

Recommend that the shoulder areas and fire break area be kept with a 2% cross grade to allow for truck climbing lanes and for recreational use by bikers and runners. There is an annual event called the Saddle Road Relay and Ultramar that could develop into a very popular event annually. Besides, many mountain bikers use Saddle Road to access the upper recreational areas. Runners such as myself - use the Saddle Road area for altitude training and physical conditioning with hill climbing runs in all types of weather conditions.

688 Kinooole St., #207 - Kilo, Hawaii 96720-3869 \* Phone (808) 935-3374

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XC MEI  
UU

215 Wanted *minimal installation of roadside fencing* to allow access where now not fenced to let people enjoy the resources of scenic and floral / fauna wonders. Proper signage should alert the public to the risk / warning of private property and to respect their being in trespass.

104 Although not mentioned by me - another idea is to support and aggressively seek designation of Saddle Road as a *Heritage Trail* with gateway signs, information plaques, trailhead facilities, and scenic view turnouts - to enjoy ISTEA funding and community support. Traffic can traverse this improved roadway at highway speeds, yet being a heritage trail will encourage eco-tourism and provide a much needed tourist feature attraction for the Island of Hawaii.

216 Another suggestion is to allow for the designation into the entire Saddle Road for a *Energy / Utility Corridor* for water lines, telecommunication, and possible fuel lines usage. Although not yet financially feasible, there may be future justifications for installation of these facilities within the planned Saddle Road right-of-way. There is a past study on water lines along the Saddle Road, and PTA facility can be served with water from somewhere besides trucked in. Since this is a major cross-island access, planned inclusion as an energy / utility corridor now will allow entities to reasonably plan cross-island links.

**ALIGNMENT COMMENTS:**

217 Wanted *E-3 for Section IV alignment*. Although some wetlands / drainage related mitigation may arise, the proximity of being away from residences outweigh the habitat intrusion. With the highway improvements, some park / open wetlands may be created adjacent to the highway as drainage detention basins and eco-system incubator areas. E-3 alignment will also align Puuinaako Extension project into Saddle Road improvements with better curves.

218 For Section II - consider a *land exchange* to revert that area to the north of the controversial Palila habitat (PTA-1 & PTA-3) to a state game preserve managed by the state, then have the military obtain more area to match. Realign the highway to the edge of the forested limits. Area for acquisition can be from along the south west side of the existing Pohakuloa Training Area (near mile post 42 vicinity - Section I) into State leased lands. I am aware of and in contact with representatives of present lessor (Puuwaawaa Ranch) lands owned by the state and they would probably agree that the boundary can square - off the PTA site.

Please contact me should there be any questions regarding this submittal.

Sincerely,

Dennis K. Stigeoaka, P.E.

688 Kinolee St., #207 • Hilo, Hawaii 96720-3869 • Phone (808) 935-3374



**THE OUTDOOR CIRCLE**  
1114 South King St., Suite 306 • Honolulu, HI 96813  
Phone: (808) 593-0300 Fax: (808) 593-0555

December 22, 1997

The Honorable Benjamin Cayetano  
c/o Office of Environmental Quality Control  
235 South Beretania Street, Ste. 702  
Honolulu, HI 96813

RE: Saddle Road Improvement

Dear Governor Cayetano:

Thank you for the opportunity to comment on the above referenced Draft Environmental Impact Statement. We have reviewed the documents and offer the following response:

The potential impacts on the vegetation and wildlife in the wake of Saddle Road improvements are significant. There are impacts associated with construction, and long term problems associated with increased traffic and accessibility to areas which currently are more difficult to reach. In addition, the proposed route passes through some extremely sensitive eco-systems and plans must be developed to protect the wildlife and fauna as traffic increases. There is no evidence in the DEIS that this has been done.

What are the likely consequences to areas with rare, native, endangered species as a result of increased access and traffic? The DEIS identifies many endangered, as well as native plants and animals. It seems, however, that their potential loss is weighed against travel time savings and economic benefits. The Outdoor Circle is not in agreement with this assertion. It is important to look at some of the hidden costs not identified in the document. Increasing the amount of traffic will result in a higher incidence of motor vehicle accidents, leading to the promotion for greater police enforcement as well as EMS response. The highway will lead, no doubt, to more gas stations, more development, and certainly additional urbanization. It is these consequences which our organization finds troublesome, and which the DEIS does not address.

The project is significant and should be discussed more widely. The concerns regarding protection of the environment are at its heart. The Outdoor Circle, with 12 branches Statewide, and five on the Big Island, should be considered major stakeholders in deciding whether to construct the highway improvements or not.

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A Non-profit Organization  
**BRANCHES**  
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MOLOKAI  
GARDEN CIRCLE  
Lanikai

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HILO OFFICE

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DEC 23 1997


Saddle Road Improvements  
December 22, 1997  
Page 2

We had an extremely hard time receiving the DEIS and its seven addendums for review. After many phone calls, we were sent the main document, but it took several more calls to get the technical addendums. Finally, we received four of the seven addendums, making our response inadequate at best. Since our organization relies heavily on volunteers to review reports, and formulate responses, we do not feel we can expect these people to go to the few libraries where the DEIS was sent. The unavailability of documents leads to incomplete public participation. This is a serious problem, especially when the project receives Federal funding. Public input should be sought and encouraged.

222

In conclusion, it is our opinion that the Draft Environmental Impact Statement does not adequately balance the environmental risks against the economic benefits of the Saddle Road Improvements. Further assessment is required. Thank you for the opportunity to comment.

Sincerely,

  
Mary Steiner  
CEO

cc: Kenneth Au, SDOT  
Bert McCauley, FHWA  
Donald Okahara, Okahara Associates

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OKAHARA & ASSOC., INC.  
KAILOA-KONA OFFICE

60-1702 MELIA STREET  
P.O. BOX 303910  
WAIKOLOA, HAWAII 96738

ADMINISTRATION  
(808) 885-9422

December 11, 1997

EX-1011111  
12/11/97 12:16

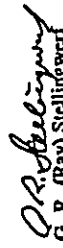
My name is Ray Stellingwerf, and I am the President of the Board of Directors of the Waikoloa Village Association. The Association represents 2,363 property owners of Waikoloa Village, and we currently estimate the residential population of the Village to be approximately 6,000.

The Board of Directors asks for your consideration of the following issues regarding the proposed improvement of State Route 200:

- 38
- 1) Section 1 of the project, Route W-2, proposes an intersection of the Saddle Road at Mamalahoa Highway and Waikoloa Road. We believe that this option provides the most direct cross-island route for civilian travel, and will also expedite military traffic between Kawaihae Harbor and their up-country training area. We therefore recommend the adoption of Route W-2 in Section 1 as the most effective for the majority of users of the Saddle Road.
  - 2) We believe that implementation of either option will heavily impact traffic volumes on Waikoloa Road. The Saddle Road will become the route of choice for cross-island traffic, both for automobiles and commercial vehicles. Waikoloa Road provides the most logical access to the Saddle Road. An additional factor to consider is that the Saddle Road will become accessible to tourists in rental cars.
  - 3) We therefore urge you to consider improving Waikoloa Road either before or concurrently with the Saddle Road project. Passing and climbing lanes are needed even at present traffic levels. The addition of heavy civilian traffic volumes to the current levels of military traffic would seriously effect vehicle movement on Waikoloa Road. We also have concerns about related safety issues.

59

The Board of Directors and Members of the Waikoloa Village Association urge you to favorably consider the issues stated, and I thank you for the opportunity to comment on this badly-needed project this evening.

  
G. R. (Ray) Stellingwerf  
President  
(808) 883-9335

Golf Club  
(808) 883-9621

Environmental Control  
(808) 883-8888

Clubhouse Pool & Tennis  
(808) 883-9704

Restaurant & Lounge  
(808) 883-9611

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TO: Mr. Bert McCauley, Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang St.  
Denver, Colorado 80220

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JAN 2 1983

COMMENTS: SADDLE ROAD DRAFT EIS  
STATE ROUTE 200 PROJECT (FHWA Project No. A-ND-6(1))

DR. FRED D. STONE

Hawai'i Community College  
200 W. Kawili St.  
Hilo, HI 96720  
(808) 9747537

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

I am submitting this testimony in support of the mitigation measures for the realignment and widening of Saddle Road. I am well acquainted with the natural resources along the proposed route of the Saddle Road project. Since the mid-1970's, I have studied the cave insects living in the lava tubes along Saddle Road as a Research Associate with B.P. Bishop Museum. In 1984, I moved to Hilo, and have taught at U.H. Hilo and Hawai'i Community College since then. I participated in the E.I.S. for the Saddle Road widening in the mid-1980's and in the State E.I.S. for the Punaikoa Road Extension (with Young-Ki Iahm and Associates).

Each term, I take students in my Environmental Science, Geography, and Hawaiian Natural History classes on field trips up Saddle Road. The ecosystems in the kipuka and the 1855, 1881, and 1935 Mauna Loa lava flows are an educational resource of immense and irreplaceable value. Students are able to learn to identify native plants, birds and invertebrates. They also learn at first hand the impacts of roads on the spread of introduced species and the loss of native habitat.

The kipuka along the eastern (windward) section, as well as those of the upper Saddle and the western (leeward) sections, are particularly important for research on the evolution of plant and animal species adapted to different elevations, climates and habitats.

Many other groups use the natural ecosystems of the Saddle Road; hikers, bird-watchers, native gatherers, eco-tourists, and hunters for example.

I am concerned that the road be carefully aligned so that it does not negatively impact the kipuka and lava flow ecosystems. Staging areas and other construction sites need to be carefully planned and made part of the final EIS. Turn-outs and parking areas also need to be planned in detail to avoid causing more problems than they are meant to prevent.

225

MAIL ROOM  
FROM: Elizabeth Ann Stone  
General Delivery  
Maalehu, Kailua, HI 96722



Attention H.P.D. 16 Saddle Road  
Federal Highways Administration  
555 Zang St. Room 259  
Lakewood, Co

80 228

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OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

December 16, 1987 P.S. It is also hunting area. We are not aware of any place the hunting area is located. Regarding Saddle Road, many equestrian write use all the old roads with very little or no hazard to either as all are going slow to avoid rock+holes+curves.

Is it possible to provide an equestrian RIBBIT-OF-WAY area along with sidewalk and BIKE WAY areas. The traffic on Spook & them when they don't see them. Could there be a little distance between the traffic area & the equestrian area. Sincerely, Elizabeth Ann Stone

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226 Fire barriers along the road sides can actually enhance the spread of fire tolerant aliens such as fountain grass. Other alien species will be spread by the disturbed and bulldozed area along the road. The mitigation measures that call for regular inspection and removal of alien species need to be included in the final plan, and rigorously enforced.

In looking through the Draft EIS, I believe that it has not gone far enough in including detailed plans for specific alignments to avoid kipuka, in including the detailed engineering layouts for pullouts, parking areas, fences, detours and construction staging areas.

227 During construction, it is likely that lava tubes will be opened up during cutting. These lava tubes should be inspected by trained biologists and archaeologists for presence of native cave species and for cultural remains. Mitigation should include plans to place conduits under the road to allow the lava tube to remain open and accessible.

I am looking forward to seeing these things included in the final EIS. I also feel there should be additional chances to respond to the EIS when it includes these details.

Thank you for your consideration,

Dr. Fred D. Stone

*Fred D Stone*  
Math and Natural Sciences Division  
Hawaii Community College

December 10, 1997

To: Federal Highways Administration 555 Zang Street  
Lakewood, Colorado 80228

From: Glenn Y. Suzuki  
3531 Kaimuki Ave  
Honolulu, Hawaii 96816

Re: Saddle Road Environmental Impact Statement  
Public Hearings, December 11 & 13, 1997

Gentlemen;

36 My name is Glenn Suzuki and I am in support of the Saddle Road Realignment Project. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, and believe that the document addresses all possible community concerns and technical information.

228 The Big Island has historically been an agricultural community with sugar cane as the dominant crop. With the demise of the sugar industry in Hawaii, the Big Island can no longer depend on agriculture as its prime source of income. The tourist industry will be the dominate economy in the future of the Big Island. With the tourist industry based in Kona, on the west side of the island, and Hilo being the seat of county government on the east side of the island, it is critical the Saddle Road be upgraded to improve communication and transportation between these municipalities.

229 Citizens of the Big Island, both corporate and the community at large will benefit from a project of this scope. We are most encouraged with the DEIS findings and mitigation plans, and urge expedited support for this important project.

Thank you for the opportunity to submit these comments.

Glenn Y. Suzuki,

*Glenn Y. Suzuki*  
Concerned Citizen

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OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE



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December 9, 1997

Federal Highways Administration  
555 Zang Street  
Lakewood, Colorado 80228

Gentlemen:

RE: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARINGS - DECEMBER 11/13, 1997

My name is Ronald K. Takamoto and I am a private, employed citizen who has lived on the Big Island of Hawaii all my life. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, and believe that the document addresses all possible community concerns and technical information.

As a private citizen and an employee of an engineering company, the Saddle Road is a very important mode of transportation for us, joining the East (Hilo) and West (Kona) sides of the island by a shorter route. One of the main reasons why this project should be undertaken is because many, many citizens commute back and forth between the East and West sides of the island for their jobs. They work on the West side of the island (because that is where the jobs are) and live on the East side. They commute every day and this is by far a shorter route. Another important reason is because, as you know, we have a military base, the Pohakuloa Training Area, in that area and the Saddle Road is the main road used to get to the PTA. It is used constantly by the military. As the road is now, the citizens of the Big Island hesitantly use this road because of its very dangerous conditions -- too narrow, with many curves, causing many accidents, which in turn cause law suits that the tax payers (ourselves) end up paying for. Improving this road by realignment, widening, etc. will undoubtedly be an asset and very beneficial for the citizens and community of the Big Island of Hawaii. Also, we have been waiting for this road to be improved for almost half a century. Please kokea!!

Citizens of the Big Island - both corporate and the community at large - will benefit from a project of this scope. We are most encouraged with the DEIS findings and mitigation plans, and urge expedited support for this important project.

Thank you for the opportunity to submit these comments.

Sincerely yours,

*Ronald K. Takamoto*

Ronald K. Takamoto  
18 Aloha Ln Dr.  
Hilo, HI 96720

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QUESTION CARD  
Saddle Road Project  
Public Hearing  
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DEC 13 1997  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

NAME: Michael T. Sae  
ADDRESS: P.O. Box 1175  
Kona, HI 96741

REPRESENTING: MYSELF & ALL THE HUSBANDS

QUESTION: How does the Big Island Highway Authority  
A: Hopefully protected areas I showed that  
they can't if they give another award for  
The Soc. 2 proposal. I told them proposal is  
I know how 2 party public works part of road  
I would not want to be paid for it.

230

97024

STEFINI MORGES  
R. BEN TSUKAZAKI  
THOMAS LIT. YEH  
MICHAEL W. MOORE

Meñezes Tsukazaki Yeh & Moore  
ATTORNEYS AT LAW  
100 Puuhale Street, Suite 204, Hilo, Hawaii 96720  
Telephone: (808) 941-0253 FAX: (808) 969-1531

**KTA SUPER STORES**



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DEC 11 1997

OKAHARA & ASSOC. INC.  
KAILUA-KONA OFFICE

December 9, 1997

ATTN: Mr. Larry C. Smith, Division Engineer  
Federal Highways Administration (HPD-10)  
555 Zang Street, Room 259  
Lakewood, CO 80228

RE: Saddle Road Environmental Impact Statement  
Public Hearings - December 11, 13, 1997

Gentlemen:

I am Barry Taniguchi, President of KTA Super Stores and Waikoloa Village Market. I reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road Project and believe the document addresses all possible community concerns and technical information.

We operate 6 stores throughout the island of Hawaii (East Hawaii, West Hawaii and North Hawaii) which requires our administrative and store personnel to travel cross-island very frequently. We currently utilize the Saddle Road and agree that the proposed improvements would greatly benefit the safety and efficiency of our personnel travel, as well as others who use the Saddle Road.

The proposed project appears to be flexible enough to select alternatives if previously unrecognized environmental or historic sites are discovered during the course of construction.

We are very encouraged with the Draft EIS findings and mitigation plans and urge expedited support for this important project. We hope it can be implemented in a timely manner with considerations given to avoid impacting activities which increase cross-island traffic (e.g. Marie Monarch, Ironman Triathlon, Waikii Music Festival and Mauna Kea Relay among a few).

Thank you for the opportunity to submit these comments.

Sincerely,

Barry K. Taniguchi  
President

KTA CENTER / ONE PIHAKONA DRIVE / HAWAII 96720 / PHONE FROM 808-958-4575

December 22, 1997

Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
555 Zang Street  
Denver, Colorado 80228

Re: Draft EIS for Saddle Road, County of Hawaii  
FHWA Project No. A-AD-6(1)

Dear Mr. McCauley:

This firm represents Waiki'i Ranch Homeowners Association ("Association").

The Association concurs generally with the points which are made in a letter to you dated December 19, 1997 from Roger Harris, an experienced, local land use planner who is working on the second increment of the Waiki'i Ranch Subdivision.

In particular, the Association requests that a proper social and economic impact analysis be performed with regard to current and future residents and owners at Waiki'i Ranch, especially with regard to the proposed W-2 property alternative. If the W-2 alternative is still under serious consideration, we strongly suggest that a modification of the W-2 alignment be studied in order to create a larger "buffer area" between the highway and Waiki'i Ranch, thus reducing direct impacts upon the homeowners at Waiki'i Ranch.

The Association requests that it be considered a consulted party in this environmental review process if it is not so considered at present. In addition, the Association requests that it be forwarded a copy of the next draft of the environmental impact statement, whether a final or pre-final draft. The Association will pay for the cost of the copy.

1  
36  
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DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION

DEC 22 10 20 AM '97

ETHEL WAKANO  
200 ANELA STREET  
HILO, HAWAII 96720

December 18, 1997

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JAN 7 1998

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

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DEC 23 3 38 PM '97  
DEPT. OF TRANSPORTATION  
HIGHWAYS DIVISION

Mr. Kazu Hayashida, Director  
State of Hawaii  
Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813

Re: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Hayashida:

My name is Ethel Wakano and I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road and I support the project.

36

39

Yours truly,

Patricia Tummons

187-C. Hahaione Street  
Hilo HI 96720

cc: Office of Environmental Quality Control  
RUST Environment & Infrastructure

Thank you for your consideration of my concerns. I look forward to seeing the draft EIS.

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I believe it will make East and West Hawaii a closer community when the realignment is completed. Travel will be much faster and safer - citizens of the Big Island will be the beneficiary of this project and I urge expedited support for this project.

Thank you for the opportunity to submit these comments.

Sincerely,

*Ethel Wakano*

Ethel Wakano

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STATE DEPARTMENT  
OF TRANSPORTATION  
DEC 26 10 57 AM '97  
HIGHWAYS DIVISION  
PLANNING BRANCH

been witnessed elsewhere in the state.  
With the realignment of the Saddle Road so that it no longer passes through PTA, it is reasonable to expect an increase in off-road vehicular traffic in the Saddle area, close to the base of Mauna Kea. How will rare and endangered plants and animals in the area be affected by this? Also, potential erosion and flooding problems may result. Will any effort be made to discourage off-road travel?

323

VI. Weed Control.

At present, many weed species line the Saddle Road. It is to be expected that weeds will follow any new alignment of the road, so that areas now relatively free of weeds will become overgrown with weeds, perhaps to the detriment of native species. Will anything be done to address or control the introduction of weeds from areas where they are not now present?

324

VII. Rationale for Project

As a resident of the Big Island, I question the rationale for this project. Many of us who live here want to keep the Saddle Road as it is, since in its present state it discourages heavy traffic through an area that has an almost wilderness quality to it. Any change in the character of the Saddle Road will inevitably and irreversibly damage the tranquility and beauty of the area. This loss cannot be overestimated. As a consequence, I believe that any change in the status quo must be done for clearly stated, understood, and agreed-upon reasons of overriding social value.

325



**MOKU·LOA·GROUP**  
SIERRA CLUB · HAWAII CHAPTER

December 21, 1997

Mr. Bert McCauley  
Environmental Planning Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
ATTN HPD-16, Saddle Road  
555 Zang St. Room 259  
Lakewood, CO 80228

**RECEIVED**  
JAN 2 1998

OKAHAKA & ASSOC., INC.  
KAILUA-KUNA OFFICE

Dear Sir,

The Sierra Club (Moku Loa Group, Hawaii Chapter) offers the following comments in response to the Draft Environmental Impact Statement (DEIS) for the Saddle Road (State Route 200) and Mameloa Highway (State Route 190) to Milepost 6, HIWA Project No A-AD-6(1).

Sierra Club concurs with DEIS statements regarding the need for changes and improvements to the Saddle Road. The current volume of traffic and conflicts with military activities have rendered this scenic and historic thoroughfare hazardous to all who drive it. A safe alternative to the belt highway for cross island travel is necessary to meet future needs.

We are concerned about the impact of construction of PTA-1 and PTA-3 on the critical habitat of native bird species. Birds including the palila use these areas during the day for foraging and threats such as fire, removal of native vegetation, construction noise and activity, alien plant, animal and disease dispersal in the habitat are a serious concern. The area has already been negatively impacted by military maneuvers, enhancement of rodent populations due to improper food waste disposal, accidental fires and feeding on native vegetation by feral ungulates. None of these impacts have been dealt with appropriately by agencies charged with protection of endangered species. This proposed project will fragment and isolate more than 500 acres of critical habitat, not just the 100 acres of constructed pavement described in the document. If the plans to construct the PTA-1 and PTA-3 sections proceed, then we are strongly in support of the mitigation measures proposed to set aside, enhance and manage alternate habitat for these avian species. We are well aware of the risks posed by massive construction activities in a critical habitat, and that the mitigation measures proposed are expensive and not guaranteed to provide suitable alternate habitat. The palila may not relocate to the restored area. Nevertheless, we support this proposal to mitigate the substantial hazard imposed by the proposed road re-alignment. We are very concerned that the mitigation agreement be ironclad, that the provision be fully funded, and that long term commitments be kept. Special attention to these agreements must be addressed in the record of decision.

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207 Segmented and incremental development of the highway may not match a segmented and incrementalized funding for the mitigation package. Sierra Club is concerned that no funding is committed for the non-PTA portions of the Saddle Road proposal. It is inadequate to merely identify potential sources of funding. Please disclose the impacts of only partial completion of the project for the non-PTA portion.

225 We are also concerned about the inadequate and incomplete disclosure of location of pullouts, passing lanes, scenic lookouts, staging yards, parking areas and construction detours. We do not believe all of these areas can be situated within the surveyed right of way. Please address these details so we can comment on impacts, alternatives and mitigation of these actions.

233 In the eastern portion of this project, our concern is on the impacts such as alien weeds and physical disturbance on kipukas which contain intact native plant and animal communities. These resources are valuable to many constituents including recreational users, traditional gatherers, students and teachers, scientists, photographers and many others. We are concerned that fencing (needed for certain road stretches) will be ugly and will not blend into the landscape. We request some mitigation for visual aesthetics. Discussion with the community should take place for appropriate gates and other devices for people to get around the barriers.

234 We are concerned that not enough consideration has been given to non-vehicular modes of transportation, including bicycles, horses, foot traffic, not to cross island tram.

235 In the eastern portion, we are concerned about the cumulative impacts of several projects on the floral and faunal communities which have developed on the 1881 and 1885 lava flows. Not all of these projects are detailed in the DEIS, and the cumulative impact of all the projects including the Saddle Road, Puainako Extension, Mohouli Extension and University Park and urban expansions must be considered and mitigated. We request a map analysis of the 50-150 year-old flows to estimate the range and impact on this fairly rare and unique community. For example, cave adapted species dependent on roots of native plants for food and shelter can be highly impacted by surface clearing and replacement of native vegetation with alien species. When mitigation measures are negotiated, consideration must be given to the very real diminution of this habitat and the management of that which remains.

236 Thank you for the opportunity to respond.

Sincerely,  
*Deborah Ward*  
Deborah Ward  
Conservation Committee  
Moku Loa Group, Sierra Club Hawaii Chapter

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PLANNING COMMENTS SHEET  
Saddle Road Project  
RECEIVED  
DEC 13 1997

Public Hearing  
December 11/13, 1997  
OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

Your comments and suggestions will assist in the responsible development of the highway project under consideration at this Public Hearing. Space is provided below to write out any comment you may wish to make. Please hand in your statement during this meeting or, if you prefer, mail to the address printed below. Although comments are welcome throughout the project development process, we would like to receive your initial comments by December 22, 1997.

COMMENT OR STATEMENT

184 I am not against the saddle road  
I am against destroying the Vaila  
NASSAT. This is not by more than  
any inside land GRAS.

Please Do Not Destroy This

Copies of all comments provided are available to the public under the Freedom of Information Act. This will include names, addresses, and any other personal information provided with the comments. Your comments will be considered with or without the following optional information (please print):

Name: James B. Watt  
Address: P.O. Box 29, Mt. View 96771  
Representing: Big Island Bird Nourishy  
Mailing Address: Federal Highway Administration, Central Federal Lands Highway Division, 555 Zang Street, Room 259, Lakewood, Colorado, 80228 (Attention: Mr. McCauley, JHPD-16, Saddle Road)

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DEC 11 1997

NANCY J. WASSMAN  
P.O. BOX 155  
LAUPAHOEHOE, HAWAII 96764

OKAHARA & ASSOC., INC.  
KAILUA-KONA OFFICE

December 11, 1997

Federal Highways Administration  
555 Zang Street  
Lakewood, Colorado 80228

Re: SADDLE ROAD ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARINGS - December 11/13, 1997

Gentlemen:

My name is Nancy Wassman and I am a resident of the Big Island of Hawaii. I have reviewed the Executive Summary of the Draft Environmental Impact Statement for the Saddle Road, and believe that the document addresses all possible community concerns and technical information.

1 My family and friends use the Saddle Road to commute to Kona to go to work, shopping at Costco, K-Mart, Wal-Mart, and to vacation away from Hilo. It would be great to have a road to get us to Kona safer and within 2 hours.  
36

The Saddle Road will be a benefit for all of the citizens of the Big Island.

Sincerely,  
Nancy J. Wassman  
Nancy Wassman

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Kona Kohala Resort Association

67-778 Waialeale Drive, Kona, HI 96743 • Telephone (808) 855-1044 • Fax (808) 855-1044

December 4, 1997

Federal Highway Administration  
Box 50206, 3100 Ala Moana Blvd.  
Honolulu, Hawaii 96850

ATTN: A Whalum Y2 Wong, Division Administrator

RE: Comment on the Draft EIS for Saddle Road Improvements

Aloia Mr. Wong,

The Kona Kohala Resort Association (KKRA), a consortium of hotels and resort developers along the Kona Kohala Coast, reviewed the Draft EIS. The members support planned improvements to Saddle Road and offer the following comments.

Their concerns and reasons for support are based on increased safety for motorists and efficiency of transporting goods across-island.

Saddle Road is an important cross-island link for all facets of the Big Island community. If it is improved, the time saved in crossing the island would be tremendous. Many employees who reside in Hilo and work on the Kohala Coast would find an upgraded Saddle Road would mean a shortened and improved daily commute. Goods and services that now struggle with the two lanes along Hamakua Coast or around South Point would find a more direct route to their customers on the other side of the island. This kind of infrastructure improvement would give a definite rev to the Big Island's economic engine.

On the issue of safety, the current Saddle Road is really only wide enough to support one lane of traffic. This creates a dangerous situation in several instances along the route. Rent-a-Car companies fired their customers to stay off of the Saddle Road, depriving our visitors of some of the most beautiful views on the island. Residents avoid the Saddle because it is not well-maintained and because of the element of risk connected with the road.

Additionally, with regard to realignment of the Saddle Road, the association supports Route W-2, which would connect Saddle Road at the Waikoloa Road junction with Maunaloa Highway. We see this as the safest, most efficient, convenient and direct route for the Saddle Road realignment to take.

KKRA appreciates the opportunity to comment on this draft EIS for Saddle Road.

Sincerely,  
*[Signature]*  
Noelani Whitington  
Executive Director

- cc: The Honorable Benjamin Cayetano, Governor, State of Hawaii
- The Honorable Daniel Ige, Senator, United States Congress
- The Honorable Mālama Solomon, Senator, State of Hawaii
- The Honorable Andrew Levin, Senator, State of Hawaii
- The Honorable David Ige, Representative, State of Hawaii
- The Honorable Leoy Chang, Representative, State of Hawaii
- The Honorable Bob Iler, Representative, State of Hawaii
- The Honorable Dwight Takama, Representative, State of Hawaii
- The Honorable Ika-Hanaka, Representative, State of Hawaii
- Pau Hailufan, Hawaii Island Economic Development Board
- Ken McElroy, Waikoloa Land Company

DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION

Dec 8 3 09 PM '97

DOJ  
PLEASE CONTACT NIA  
FBI - Comment/Recommendation (required)

Roger E. West

73-1323 Awakea Street • Kailua-Kona, HI 96740 • Telephone (808) 325-5599  
E-Mail: roger@kona.net

Federal Highway Administration  
555 Zang Street, Room 259  
Lakewood, CO 80228

Attention: HPD-16 SADDLE ROAD

November 20, 1997

Dear Sir,

I want to go on record with this "off the wall" proposal: Please consider instead of improving the Saddle Road, a road that begins only seven (7) miles from Waimea and goes to Hilo, you build a new road that begins in Honalo or Kainaliu and continues on the other side (East side) of Mt. Hualalai to the nearest place the Saddle Road comes to Kona side (West side).

In this way people from Kona Districts (North and South) will not have to drive into Kailua-Kona and almost to Waimea (which is half way to Hilo) before using the Saddle Road. It would save miles and time and connect the East and West Sides of our island. If Mt. Hualalai were to erupt, on the west side, (it's past due) it would cut off Kona District North and South. This would serve two purposes.

Please consider this "off the wall" idea, for the record. Thank You!

Sincerely,

*[Signature]*

Roger E. West

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JAN 2 1998

KATS YAHADA  
P. O. Box 5856  
Hilo, Hawaii 96720

OKAHAKA & ASSOC., INC.  
KAILUA-MAUNA OFFICE

Dec 10, 1997

Federal Highway Administration  
Central Federal Lands Highway Division  
555 Zang Street, Room 259  
Lakewood, Colorado 80228

ATTN: Bert McCauley, HPD-16, Saddle Road

Gentlemen;

In response to the Draft Environmental Impact Statement, these comments and criticisms attempts to highlight the major problems associated with it.

The performance with you coordinator in Hilo is less than satisfactory. In my first meeting with him, he has promised to give the names and organizations involved in the preparation of the DEIS. He has failed to provide us with that information and has failed to return our telephone calls.

In addition, although the preliminary draft was available in March 1997, he has refused to give us a copy or make a DEIS available to the hunting clubs. In fact, in all of Hilo, Hawaii, only one complete set was available at the Public Library which couldn't be checked out. One copy each was available at the County Public Works and HDOT, which were available to the public only in the event their employee were not using it. Realistically only one complete copy was available for the public on a \$169m project.

To further public participation, the hearing in Hilo was held on a Saturday morning when a large portion of the hunting public could not attend.

The remainder of the comments are based on a support of EX 2 and against PTA-1. Initially, I note that the Sierra Club and the Audubon Society are plaintiffs in the lawsuit against DLNR. Several hunters and hunter organization intervened in the case in behalf of DLNR. The case involved the eradication of feral and mouflon sheep from the Palila Critical Habitat. With that in mind would it be appropriate

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to hire those organizations or a member of those organizations to prepare that portion of the DEIS which dealt with hunting or effects of the Saddle Road realignment on hunting? Taken one step further, what if that person knew nothing about hunting or the quality of hunting in EX-2 or for that matter nothing about the breed of game birds or mammals or the movement or propagation thereof. Ron Terry is a member of those organizations and all of the questions asked above are true of him. PTA-1 transverges one of the best bird and game mammals hunting are on the entire island. Both game birds and game mammals tend to feed and nest in the affected area and move uphill when pursued. During the afternoon and evening they move back down into the affected area to feed. The proposed realignment will cut off birds and mammals from their feeding and nesting area. In addition, any birds and mammals attempting to cross the realigned Saddle Road will only add to their mortality and destroy the entire area to hunting. I ask you to keep in mind that the projected traffic through the area is expected to reach 14,000 vehicles per day by the year 2014. The vehicular noise alone will destroy the area to bird and mammal hunting.

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It appears that the preparers of the DEIS wanted to reach a certain conclusion, and to attain that goal picked a person with a bias towards their inclinations. It seems Ron Terry has a definite conflict of interest.

In every aspect of the DEIS, the preparers failed to take into account the long term effect of the realignment not only to hunting but to the observatory, the endangered birds and plants in the area. I would tend to think that 14,000 vehicles passing through the area during the day and night would obstruct the use of the telescopes. A decade ago the city of Hilo was asked to change all of its streets from mercury vapor lamps to low sodium since the lights obstructed the use of the telescope. Vehicles with halogen lamps will more than likely have a greater affect.

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The DEIS also fails to consider the impact of 14,000 vehicles on the Dark Rumped Petrel. We already know that lights at night will disorient the Petrels returning to their nests on Mauna Kea. If the existing traffic does not impact the petrel, think of what fifteen times the existing traffic will have on the bird, especially with the increasing use of halogen lamps.

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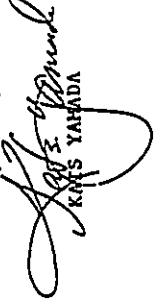
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I am sure that the proponents of the palila mitigation plan will be quick to point out that one of the census counters heard a palila in the affected area. While the alleged claim might have been made, all of the census counters brought to the area could not find any evidence of palila in the area. Thus for over two decades not a single palila has been counted in the affected area.

The submission of the palila mitigation plan not only caused USFWS to prostitute their ideals, but got greedy in the process. I ask that the palila mitigation be denied in toto.

Eighty percent of EX - 2 between Hale Pohaku Road and Mauna Kea State Park crosses barren a'a lava fields where there are no endangered plants or birds or problems associated with the introduction of alien weeds. Furthermore EX - 2 does not raise the problem with palila mitigation. Therefore, a reasonable solution may be to retain EX - 2 between Hale Pohaku Road and Mauna Kea State and PTA - 1 for the remainder of the way.

Very truly yours,

  
KINGS YAMADA

I cannot believe the the USFWS would be willing to accept in its Palila Mitigation Package areas which have had NO palila in recent decades. I cannot believe that these defenders of the Palila and its habitat would be willing to prostitute their ideals for a "land grab." A member of USFWS was once heard telling his cohorts "don't fight it, look at all the land we're getting in return." A review of the mitigation package boggles the mind with its absurdity. A 100 to 1 exchange for a roadway realignment through the critical habitat which has no palila.

Andrew Berger, Phd. a member of the original Palila Recovery Team, states that area affected by the realignment was included in the Palila Critical habitat although no palila was known to nest in the area, because the sheep were destroying the mamane-naio forest. Van Riper, Mountaingpring and Scott, Phds. all agree that the palila is restricted to Mauna Kea between 6,700 feet and tree line. Please note that elevation is well above the critical habitat in the affected area. These are the only four authorities who have studied and published in a referee journal. Van Riper also found in his research that the palila has evolved into a "specialized" specie which is subject to heat strokes at lower elevations. Furthermore, that the palila is primarily found in the Puu Laau area on Mauna Kea because of its protected hills and lower fluctuations of heat and cold.

On four separate occasions palila were translocated to the Puu Laau area above the ranch lands sought for palila mitigation, all four attempts met with failure. USFWS seeks nearly 10,000 acres in three areas which does not support any palila nor have supported palila in recent decades. Kipuka Alala in PTA reaches the height of absurdity. It is lower in elevation than any of the palila critical habitat areas and does not contain the large expanse of mamane trees which the palila must have nor the necessary gradation of the trees. Lau's Ranch, located on the Southwestern slope of Mauna Kea, while providing the necessary gradation, lacks the mamane expanse necessary for the palila. While mamane trees could be planted, the area does not provide the protection and restrictive temperature fluctuations which the palila seeks.

Ultimately the only plausible conclusion one can reach is that this is a land grab. As one of the speakers noted, the gentleman of USFWS admitted to him that this was a political decision.

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**SIERRA CLUB LEGAL DEFENSE FUND, INC.**

*The Law Firm for the Environmental Movement*

Sierra Club  
1700 Broadway  
San Francisco, CA 94109

211 South King Street, 4th Fl., Honolulu, HI 96811

December 22, 1997

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JAN 2 1998

OKAMAHA & ASSOC., INC.  
KAILUA-KUAHONA, OHI  
(808) 939-5436 FAX (808) 931-6841

Kenneth Au  
Hawaii Department of Transportation  
Highways Division  
600 Kap'olani Blvd., Room 304  
Honolulu, Hawaii 96813

Via Facsimile Transmittal (808) 587-1787

Bert McCauley  
U.S. Department of Transportation  
Federal Highways Administration  
555 Zang Street  
Lakewood, Colorado 80228

Via Facsimile Transmittal (303) 969-5900, 969-6499

Traditional and customary practices must be accommodated by the proposed action, and to the extent other land uses, such as recreation, are diminished by the project, they should be enhanced elsewhere in the region.

252

The DEIS should include: the specific funding sources that have been committed to implement the proposed mitigation measures; a schedule for implementing the mitigation measures in relation to highway planning and construction; benchmarks to measure the effectiveness of the mitigation measures; and a contingency plan in the event the anticipated funding sources for mitigation are not secured. No construction, permits, or approvals should be issued for the realignment until the funding is secured for mitigation measures and resource protection.

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Thank you for the opportunity to comment.

Sincerely,

*Marjorie Ziegler*

Marjorie Ziegler

Re: Comments on Draft Environmental Impact Statement - Saddle Road, Hawaii

Dear Sirs:

Environmental Justice Legal Defense Fund submits the following comments on the Draft Environmental Impact Statement (DEIS) for the Saddle Road project on the island of Hawaii. Although we have several concerns regarding the proposed action and its impacts to cultural and natural resources, it is difficult to determine the adequacy of any proposed mitigation without a thorough review of the technical appendices to the DEIS, which we did not receive. The project will be subject to county, state, and federal permits and approvals, and we will participate, as necessary, in order to ensure compliance with the law and protection of the various resources affected by the project.

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Of particular concern are the project's impacts to threatened and endangered species, habitats, and ecosystems, including critical habitat for the endangered palila. The proposed mitigation relating to palila critical habitat must be sufficient in order to avoid adverse modification, which is prohibited by the federal Endangered Species Act, 16 USC § 1536(9)(2). In addition, the DEIS should disclose how the involved agencies and private parties will comply with other provisions of the state and federal endangered species laws (HRS Chapter 195D and 16 USC 1531 et seq.), including a discussion on whether HRS Chapter 195D authorizes any incidental take of listed species resulting from the proposed highway construction.

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The proposed project will adversely affect dry native forest ecosystems, most of which are unique and extremely rare. The DEIS should discuss how, specifically, the involved agencies and private parties will enhance and restore native ecosystems in the region to compensate for the loss and degradation of these systems resulting from the realignment.

PERMANENT: Denver, Colorado; Denver, Alaska; New Orleans, Louisiana; San Francisco, California; Seattle, Washington; Tallahassee, Florida; Washington, D.C.



Joint Astronomy Centre

600 N. A'ohoku Place, University Park, Hilo, Hawaii 96720, USA
Telephone (808) 961 3756 / 935 4332
(808) 961 6516 (Central)
(808) 969 6591 (Directorate Office)

Professor Ian Robson BSc PhD FRAS CPhys FInstP
Director, Joint Astronomy Centre
Director, James Clerk Maxwell Telescope

8 December 1997

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OKAHARA & ASSOC., INC.
KAILUA-KONA OFFICE

Mr. Abraham Y. Wong
Division Administrator
Federal Highway Administration
Box 50206
300 Ala Moana Boulevard
Honolulu, HI 96850

Dear Mr. Wong:

The management of the Joint Astronomy Centre (JAC) in Hilo wishes to make a strong endorsement of the proposed improvements to the Saddle Road (SR 200) on the Big Island. The JAC operates two telescopes on the summit of Mauna Kea, the United Kingdom Infrared Telescope (UKIRT) and the James Clerk Maxwell Telescope (JCMT). Our sea level facility is located in the University Park in Hilo. We have over 70 employees on staff and operate a fleet of 12 vehicles that are used primarily for travel to and from, and on Mauna Kea.

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On each work day, several of our staff commute from Hilo to Mauna Kea via the Saddle Road in the early morning and return in the late afternoon. In addition, our telescope operators often travel after dark on days of shift changes. We also have frequent visiting observers from overseas locations who drive our vehicles to and from Mauna Kea.

As is well-documented in the Draft Environmental Impact Statement (DEIS) and is obvious from anyone who has traversed the Saddle Road, the route is made treacherous by sharp curves, steep grades, extremely poor pavement, narrow lanes, and lack of shoulders. Road conditions are made more dangerous by the wet and foggy conditions which are common. We regard travel on the Saddle Road as the most serious safety hazard in our work. Furthermore, our visiting observers are often unfamiliar with the road which adds to their danger. Recognizing these factors, we make every effort to encourage our staff to drive safely and believe our drivers are among the most careful of the road's users. Despite this, JAC staff and visitors have been involved in several single-vehicle traffic accidents along the Saddle Road in recent years.

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Mr. Abraham Wong

We believe that significant improvements to the Saddle Road are both highly warranted and long overdue. The portions of the project that most benefit our organization are the proposed improvements between Mile Posts 6 and 28 (referred to as Sections III and IV, Sections Ex-3 and Ex-4A in the DEIS). The proposed improvements should increase the safety of our staff and reduce our transit times, fatigue levels, and vehicle wear in significant ways. We endorse these improvements very strongly and hope that the work can begin as soon as possible.

Sincerely,

[Signature]

Prof. I. I. Robson
Director
Joint Astronomy Centre

cc: R. McLaren
T. Geballe
J. Greenhalgh
D. McCall
I. Midson

This is page 2 of
Joint Astronomy Centre's
[Signature]

303-969-5923
Bert McLaren



FAX TRANSMITTAL
12/10/97
To: Bert McLaren
From: Gillian
CELHD - EHLA (78) 541-2700
303-969-5923
FAX 541-2704

Table with columns: DATE, TIME, NAME, etc. for Dec 12 1997

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ENV-PLANNING BRANCH  
OROC, State of Hawaii  
FAX NO. 8095971787  
(808) 808-4100

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06/11/99 FRI 13:40 FAX  
JUN- 9-99 WED 8:57 AM  
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ENV-PLANNING BRANCH  
OROC, State of Hawaii  
FAX NO. 8095971787  
(808) 500-4380

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P. 2  
P. 2



## University of Hawaii at Manoa

Environmental Center  
A Unit of West Resources Research Center  
680 Wai'aleale Blvd. - Honolulu, Hawaii 96813  
Telephone: (808) 955-7101 - Telex: 100 21 1100

December 23, 1997  
RE:0685

OFFICE

Mr. Kenneth Au  
Hawaii Department of Transportation Highways Division  
600 Kapiolani Boulevard, Room 304  
Honolulu, HI 96813

Mr. Bert McCaulley  
U.S. Department of Transportation  
Federal Highways Administration  
555 Zang Street  
Lakewood, CO 80228

Dear Mr. Au and Mr. McCaulley:

Draft Environmental Impact Statement  
Saddle Road Improvement  
Hilo, Hawaii

In order to handle anticipated traffic demand in the year 2014, the County of Hawaii proposes to improve Saddle Road (SR 200) between Mamalahoa Highway (SR 190) and Mile Post 6 near Hilo, Hawaii. The existing road contains narrow sections, steep grades, sharp curves, poor pavement, limited shoulders, and few passing opportunities. As the road passes through Pohakuloa Training Area (PTA), user conflicts often occur between motorists and military training units. The proposed action aims to improve the geometric design of the road, increase safety and capacity, reduce roadway and military conflicts, reduce cross-lane travel times, and stimulate economic growth and development. Environmental concerns include protected flora and fauna, endangered Paliia habitat, archaeological resources, fire hazards, residential displacement, traffic, noise, and cumulative effects.

We reviewed the draft Environmental Impact Statement (EIS) with the assistance of George Curtis, University of Hawaii; Hilo; Karl Kim, Urban and Regional Planning; Theresa Menard, Zoologist; and Paul Berkowitz of the Environmental Center.

### General Comments

In general, our reviewers found the eight-volume document unnecessarily long, excessively verbose, and hence difficult to review. Much of the information (such as the "hazardous" survey which contains a single-column list of all Hilo service and storage locations and the graphics

Mr. Kenneth Au and Mr. Bert McCaulley  
December 23, 1997  
Page 2

supplement which contains numerous photos of views which are unlikely to be affected) could be summarized or eliminated. In terms of content, most of the document seems adequate, with the notable exceptions of sections concerning traffic analysis, economic demand, and cumulative impact.

### Traffic Analysis

Our reviewers expressed concern that the estimates for travel demand, both with and without the road improvements, are deficient. The type of traffic model is not specified, nor does the document present information on trip generation, trip distribution, modal split, or network assignments. Also, the draft EIS does not include opportunities to estimate "induced" demand. As most retail activities currently rely on travel on Saddle Road, what percentage of new trips will be tourist-driven if the proposed improvements are made?

The draft EIS mentions safety as an important justification for the proposed action. As collisions are a function of driver, vehicle, and roadway factors, what percentage of collisions historically have been related to roadway factors? Is there evidence that safety will be enhanced by the proposed improvements? If travel demand increases, then accidents too will increase. The document should include a detailed discussion of the relationship between traffic volume, collisions, and injury severity. With increased traffic volume, Saddle Road will require additional police patrol and enforcement, as well as more frequent service by ambulance and other emergency response vehicles. These additional services and costs should be addressed in the safety section of the draft EIS.

The document omits discussion of the project's potential effects on Kaunama Drive through Hilo. As the major approach to Saddle Road, this already busy street could experience significant impacts from the expected increases in traffic. While the document claims that these effects will be mitigated by the proposed extension of another road from another part of Hilo, no data or time frames are provided for this other project. This omission must be addressed before continuing with the proposed project.

### Economic Demand

The document offers a rudimentary description of the Hilo and Kona economies, but it does not provide much justification for combining the two economies via Saddle Road. The EIS should include a more detailed sectoral analysis, including discussion of labor market conditions, investment opportunities, and projected growth rates for both economies. Background information also should be provided to indicate the effect of the Saddle Road improvements on the Institute for Astronomy and PTA. The project road has been a handicap to both these organizations, and the document should discuss the present limitations as well as the anticipated effects of the proposed improvements. For instance, how will the transport of observatory equipment be improved by the road's enhancement?

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P. 4

ENVIRONMENTAL  
PLANNING BRANCH  
OEOC, State of Hawaii

08/11/99 FRI 13:40 FAX  
JUL-9-99 WED 8:58 AM  
- JUN 08 09 08:22P

FAX NO. 8085971787  
(808) 598-4188

Mr. Kenneth Au and Mr. Bern McCauley  
December 23, 1997  
Page 3

Cumulative Impacts


Perhaps the greatest flaw of the draft EIS is the lack of attention to cumulative and secondary effects. As the project will likely lead to greater urbanization both along the corridor and in more remote areas, probable impacts include the need for greater police protection, fire and ambulance services, as well as gas stations and other services. As stipulated by law, the draft EIS needs to discuss potential secondary and cumulative impacts such as development and commercialization on adjacent land including Department of Hawaiian Home Lands property.

260

Conclusion

In summary, the draft EIS covers most issues adequately except for the sections concerning traffic, economic demand, and cumulative and secondary impacts. In these areas, the document needs to be expanded to comply with the law and to disclose important information to the public. Both the traffic and economic sections require a far more detailed presentation of the analyses performed, including a description of all models, assumptions, biases, and data elements. Currently many questions remain unanswered in these areas. Finally, in terms of cumulative and secondary impacts, the document should provide a more detailed description of the potential for growth, development, and commercialization along the corridor, as well as an assessment of secondary traffic impacts on both the east and west ends of the project. In its present form, the proposed project appears to be part of a larger undertaking which will require major road improvements on Kaimama Drive through Hilo and on the Mamalahou Highway near Kona. Before continuing further with the project, these secondary impacts should be fully developed.

Thank you for the opportunity to comment on this draft EIS.

Sincerely,  
  
Robert A. Hartson  
Environmental Coordinator

- cc: OEOC ✓
- Roger Fujioke
- Donald Chahera
- George Curtis
- Karl Kim
- Theresa Monard
- Paul Bickowitz

**END**

CERTIFICATION

I HEREBY CERTIFY THAT THE MICROPHOTOGRAPH APPEARING IN THIS REEL OF  
FILM ARE TRUE COPIES OF THE ORIGINAL DOCUMENTS.

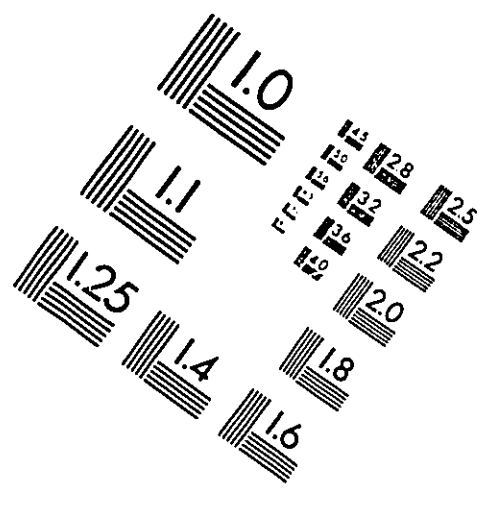
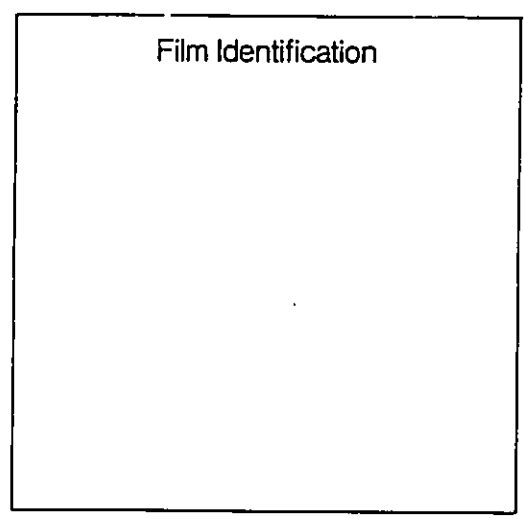
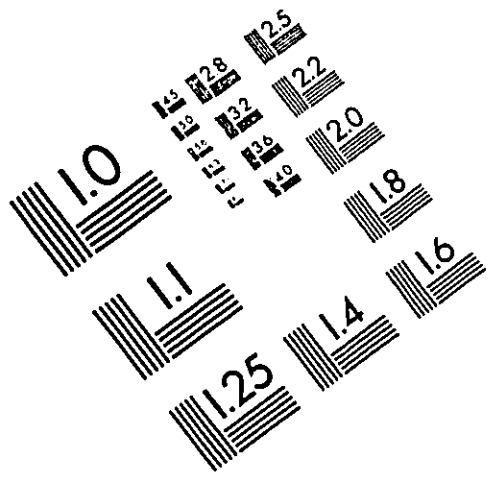
2005

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J. Kari

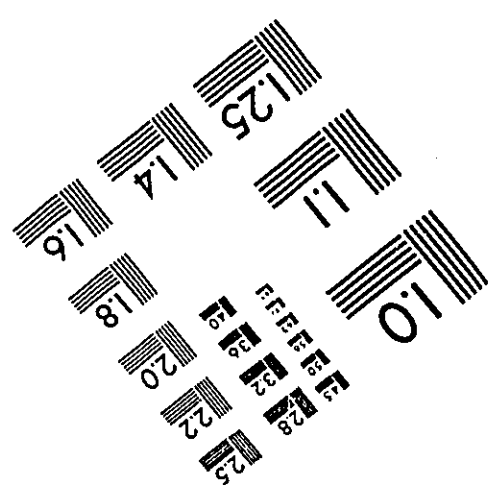
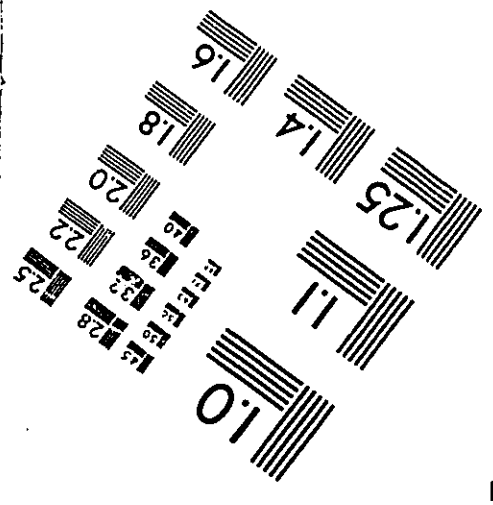
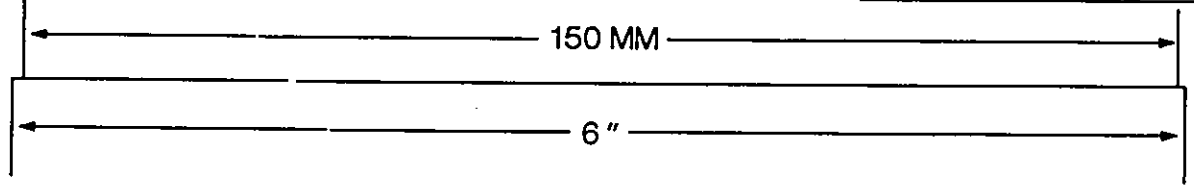
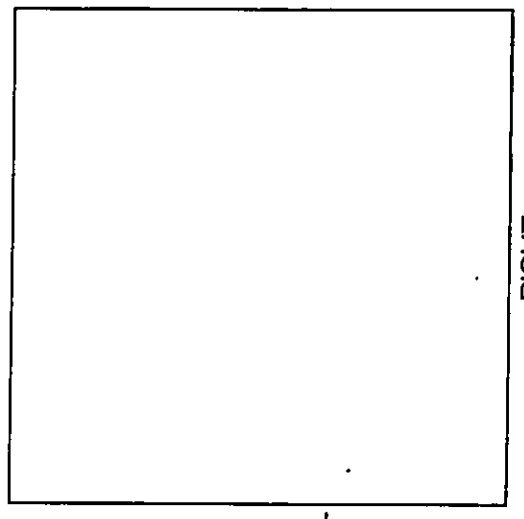
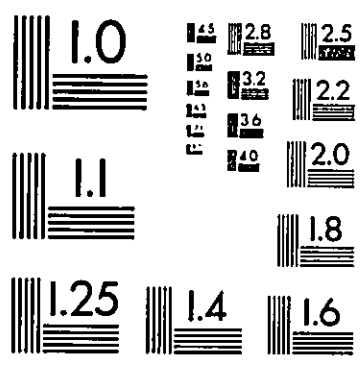
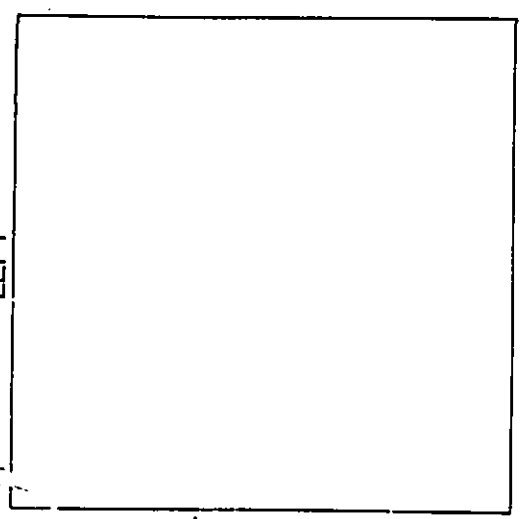
SIGNATURE OF OPERATOR

TOP



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PRECISION<sup>SM</sup> RESOLUTION TARGETS



PA-3 8 1/2"x11" PAPER PRINTED GENERAL TARGET

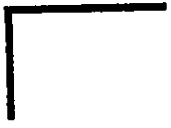


DENSITY TARGET



ADVANCED MICRO-IMAGE SYSTEMS HAWAII

DENSITY TARGET



ADVANCED MICRO-IMAGE SYSTEMS HAWAII