

Finding Of No Significant Impact (FONSI)
Environmental Assessment
for
Management Actions for Immediate Implementation to
Reduce the Potential for Extirpation of ‘Ua‘u (Hawaiian petrel) from Kaua‘i

October 2015

An environmental assessment (EA) was prepared by the U.S. Fish and Wildlife Service (Service) to evaluate management actions for immediate implementation to reduce the potential for extirpation of the endangered ‘Ua‘u (*Pterodroma sandwichensis*, Hawaiian petrel, HAPE) from Kaua‘i, Hawai‘i.

Alternatives Considered

Alternative A (Current Management): Monitoring activities related to the ‘Ua‘u on Kaua‘i are conducted primarily by the Kaua‘i Endangered Seabird Recovery Project. Management actions at known breeding colonies in Hono o Nā Pali Natural Area Reserve and Upper Limahuli Preserve include predator control and invasive plant removal.

Alternative B: Under Alternative B, existing management actions as described under Alternative A would continue and social attraction (such as the installation and playing of acoustic recordings of petrel calls) would be used to lure prospecting ‘Ua‘u to a predator-free fenced area within Kīlauea Point National Wildlife Refuge (NWR or Refuge). Artificial burrows would be installed. Decoys would also be considered based on the results of decoy trials on Maui.

Alternative C (Preferred Alternative): Alternative C includes a combination of actions described under Alternative B and chick translocation to the predator-free fenced area within the Refuge. Proposed actions related to chick translocation include (1) collection and retrieval of chicks from source locations; (2) chick care at the translocation site; and (3) monitoring.

Comparison of Effects across Alternatives

Alternative A (Current Management): Impacts to soils would be negligible because of the limited area, duration, and intensity of disturbance. Impacts to water quality would be negligible as any work would be conducted during the dry season, and the proposed activities are not anticipated to result in any discharges into existing streams or the ocean. Impacts to air quality would be localized, short-term, and negligible.

While the population in the currently managed off-Refuge colonies may stabilize, the island-wide population of the ‘Ua‘u would be expected to continue to decline. No new protected colonies would be established. Because breeding habitats for ‘A‘o (Newell’s shearwater, *Puffinus newelli*) and ‘Ua‘u overlap, management and monitoring activities associated with Alternative A also provide protection from predators and information on the status of ‘A‘o, and

therefore lead to a minor positive impact. Negligible impacts to native animals (including the endangered Nēnē (Hawaiian goose, *Branta sandvicensis*), endangered ‘Ōpe‘ape‘a (Hawaiian hoary bat, *Lasiurus cinereus semotus*), and endangered forest birds), native vegetation (including federally listed plants), and federally listed invertebrates would be anticipated, based on observations of the effects of existing management.

Impacts to cultural and historic resources would be negligible since there are no known archaeological or historic sites within the affected areas. Spending to implement this alternative would lead to minor positive benefits to social and economic resources, primarily due to secondary effects.

Alternative B: Impacts to soils would include minor localized disturbance from the installation of artificial burrows. Impacts to water quality and air quality would be similar to Alternative A.

‘Ua‘u could benefit through the successful implementation of social attraction techniques to establish an ‘Ua‘u breeding colony in the predator-free fenced area. However, it is uncertain whether pre-breeding recruits will fly near enough to hear the recordings and whether ‘Ua‘u that do hear the playback would respond. Impacts to ‘A‘o would be minor to moderate positive since social attraction aimed at ‘Ua‘u could lure juvenile ‘A‘o into the protected site. An existing Nēnē breeding population within the fenced unit could be affected by the establishment of a new breeding ‘Ua‘u population since noise and activities associated with social attraction may temporarily disrupt the activities of Nēnē, leading to minor impacts. However, mitigation measures (e.g., alternative access by foot to the translocation site, mapping and monitoring of all Nēnē nests and broods in the fenced unit, avoiding installation of speakers and burrows in known Nēnē nesting areas) would be implemented. No activities likely to harm or affect ‘Ōpe‘ape‘a, endangered forest birds, federally listed plants or invertebrates, or other native species are proposed under Alternative B, leading to negligible effects.

Impacts to cultural and historic resources, and social and economic resources would be similar to Alternative A.

Alternative C (Preferred Alternative): Impacts to soils, water quality, and air quality will be similar to Alternative B.

Alternative C, which combines social attraction with chick translocation, has greater potential than either Alternative A or B to, over the short-term, establish a breeding colony of ‘Ua‘u at a new accessible location protected from predators. Removal of chicks from existing colonies will not be anticipated to have a significant negative impact on the source colony. Moving chicks carries the risk that the birds may be injured or die during capture and transport and/or may not acclimate to the translocation site, and ultimately may die from stress or related illnesses. However, the implementation of established techniques (e.g., ensuring enough space and ventilation in the transfer box, using heat-reflective and dark boxes with flooring that provides grip and absorption) will reduce the potential for harm from overheating, injury in the carrying containers, or stress from unfamiliar stimuli. Because the translocated birds would fledge and then return to breed in a protected predator-free area, breeding success should be higher than that in existing colonies. In sum,

Alternative C will have a moderate positive impact on the island-wide population of ‘Ua‘u due to the greater chance of success for establishing a new breeding colony within the predator-free fenced enclosure than Alternative B.

Impacts to other federally listed species, native animals, native vegetation, cultural and historic resources, and social and economic resources will be similar to Alternative B. In addition to noise and activities associated with social attraction, activities associated with chick translocation (installation of artificial burrows, feeding and monitoring translocated chicks prior to fledging) may also temporarily disrupt the activities of Nēnē. As under Alternative B, due to mitigation measures, impacts on Nēnē will be minor.

Public Involvement

The Service incorporated a variety of public involvement techniques in developing and reviewing the EA as well as coordinating outreach with related conservation efforts. This included direct outreach to Federal, State, and county agencies, non-governmental organizations, and individuals; several public presentations about the project; media releases; and public review and comment on the EA. The EA was available for a 45-day public review ending August 31, 2015, during which time five public comment letters were received. Responses to the public comments were prepared and are included as an appendix.

Selection of Management Alternative

Based on our review and analysis in the EA and the comments received during the public review period, we selected Alternative C for implementation. Compared to other alternatives, Alternative C has a higher potential, over the short-term, for establishing a new breeding colony of ‘Ua‘u, protected from predation by introduced mammals and birds, which will reduce the probability of extirpation of ‘Ua‘u from Kaua‘i. Implementing the selected alternative will have no significant impacts on the environmental resources identified in the EA.

Conclusions

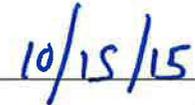
The U.S. Fish and Wildlife Service has prepared this Finding of No Significant Impact (FONSI) in satisfaction of requirements of the National Environmental Policy Act of 1969 (NEPA). This FONSI documents the decision of the Service to utilize a combination of social attraction and chick translocation to a fenced predator-free area within Kīlauea Point NWR to establish a new protected breeding colony of 'Ua'u.

This FONSI was prepared for an action that would not normally require development of an environmental impact statement. Similar actions have been carried out elsewhere without significantly affecting the quality of the human environment.

Based on review and evaluation of the information contained in the EA, I have determined that implementing Alternative C will not constitute a major Federal action significantly affecting the quality of the human environment within the meaning of section 102(2)(C) of NEPA. Accordingly, preparation of an environmental impact statement for the proposed action is not required.

This Finding of No Significant Impact, responses to comments, and supporting references are available for public review at the Kaua'i National Wildlife Refuge Complex, Kīlauea Lighthouse Road, Kīlauea, HI 96754. These documents can also be found on the Internet at http://www.fws.gov/refuge/kilauea_point/. Interested and affected parties are being notified of our decision.


Regional Chief, Pacific Region
National Wildlife Refuge System


Date

Appendix A: Comments Received during Public/Agency Review Period and Service Responses

The U.S. Fish and Wildlife Service (USFWS or Service) received comments from five entities regarding the Environmental Assessment (EA) for Management Actions for Immediate Implementation to Reduce the Potential for Extirpation of ‘Ua‘u (*Pterodroma sandwichensis*, Hawaiian petrel, HAPE) from Kaua‘i, Hawai‘i, during the 45-day comment period (Table A-1). All written comments were reviewed and organized so that an objective analysis, summary, and presentation of the comments could be made.

Table A-1. Source of EA Public Comments

Affiliation/Entities	Number of Commenters (July 17, 2015, through August 31, 2015)
Agencies	4
General Public	1
Total	5

Substantive comments received during the public comment period and the Service’s responses are summarized in Table A-2. However, comments concerning technical edits are not reflected below. Authors of comments are included in parentheses.

Table A-2. Summary of Comments and Service Responses

Comment	Response
Because of ‘Ua‘u life history and the small numbers of chicks proposed for translocation, it likely will take more than 5 years, and possibly more than 10 years, to adequately measure all proposed success metrics; please consider trying to extend monitoring beyond 10 years (National Park Service–Pacific West region).	We will consider this suggestion during implementation of the project, pending available funding.
Please consider ways to interpret the ongoing work and the birds themselves to the interested public, e.g., via remote camera links or web cams. Outreach efforts may increase understanding and appreciation of seabirds, hopefully garnering increased support for them and future seabird conservation work (National Park Service–Pacific West region).	We will consider options for interpretation and outreach during implementation of the project, pending available funding.
Haleakalā National Park strongly supports efforts to reduce extirpation of this	We will share the monitoring results of the project with its partners and the public.

Comment	Response
endangered species. We look forward to learning about the results of the proposed actions (National Park Service–Haleakalā National Park).	
The project must be consistent with specified State water quality criteria and State water quality standards (Hawaii Department of Health (DOH)).	The project will be consistent with State water quality criteria and water quality standards as no changes to existing water quality are anticipated.
National Pollutant Discharge Elimination System (NPDES) permit may be required (Hawaii DOH).	Due to the small scale of disturbance associated with proposed activities (less than 1 acre disturbed) and no anticipated changes to quality or quantity of any discharge, a NPDES permit is not anticipated to be required.
Work involving waters of the U.S. may require a permit from the U.S. Army Corps of Engineers (Hawaii DOH).	An Army Corps of Engineers permit is not anticipated because the project does not involve work in, over, or under U.S. waters.
The national Coastal Zone Management Act (CZMA) requires direct Federal activities and development projects to be consistent with approved State coastal programs to the maximum extent practicable. Federal actions are defined as activities performed by a Federal agency, activities which require Federal permits or approval, or State or local projects that receive Federal assistance. Therefore, a Federal consistency review may be needed. Please consult with our office for further information on the Federal consistency evaluation (Hawai‘i Office of Planning).	We have conducted a Federal consistency review and consulted with the State Office of Planning.
The purpose is extremely broadly stated and appears to go far beyond the purview of what Kīlauea Point National Wildlife Refuge (NWR or Refuge) actually intends to do. If the objectives truly are this broad, then more alternative means of reducing the potential for extirpation need to be considered (Kaua‘i Island Utility Cooperative (KIUC)).	The purpose and need for the proposed action are to reduce the potential for extirpation of the ‘Ua‘u from Kaua‘i in the <i>short-term</i> , given population declines and continued predation at many known colonies.
Most USFWS activity related to threatened or endangered seabirds has a multi-species focus (including Newell's shearwater and band-rumped storm petrel). In view of this, the reasons why the USFWS has settled on a single-species focus for this effort deserves	As the purpose and need states, this evaluation is meant to address the immediate need to reduce the potential for extirpation of ‘Ua‘u from Kaua‘i. The translocation of additional seabird

Comment	Response
discussion in both the plan and the EA (KIUC).	species, specifically ‘Akē‘akē (<i>Oceanodroma castro</i> , bandrumped storm petrel) and ‘A‘o (<i>Puffinus newelli</i> , Newell’s shearwater), was not considered within the scope of this EA due to their unavailability for immediate implementation.
The first two paragraphs in purpose and need section contain broad assertions (regarding the status of ‘Ua‘u) that are not well-referenced (KIUC).	While preliminary analysis of radar data collected by the Kaua‘i Endangered Seabird Recovery Project (KESRP) from 1993 to the present provides the most recent indication that the population of ‘Ua‘u on Kaua‘i is in serious decline (KESRP unpublished data and pers. comm.), other studies and reports have also asserted ‘Ua‘u are under threat of extinction if large-scale actions are not taken immediately to minimize, and mitigate for quantifiable, preventable, and foreseeable impacts of man-caused incidental take and habitat degradation due to nonnative plants and animals (Ainley et al. 1995, USFWS 1983).
Is there evidence for either of the two factors listed in the EA for reduced collection of ‘Ua‘u (less susceptibility to light attraction or because their main breeding areas are less affected by light pollution) (KIUC)?	Only a few ‘Ua‘u are collected on Kaua‘i each year during the fallout period, but it is not clear whether this is because they are less susceptible than the threatened ‘A‘o to light attraction, because their main breeding areas are less affected by light pollution (particularly as the majority of colonies are on the northwest of the island and away from human population densities), or because of other factors.
The EA notes that Hawaiian petrels were listed as endangered under the Endangered Species Act in 1967. However, it fails to mention the USFWS recovery plan, which was adopted in 1983. The EA should identify and describe the contents of the recovery plan, the extent to which each element of the recovery plan has or has not been implemented, and how this proposal fits within the recovery plan (KIUC).	The recovery plan for the ‘Ua‘u and ‘A‘o provides specific recovery objectives for the ‘Ua‘u and identifies the need for additional nesting colonies, translocation of chicks, and the development of additional colony establishment techniques (like acoustic attraction or use of decoys) as recovery objectives (USFWS 1983). The actions within this EA will support objectives identified in the recovery plan.
The section describing other planning efforts should include KIUC’s Short-Term Seabird Habitat Conservation Plan (STSHCP), which the USFWS approved in 2011, and through	KIUC drafted the STSHCP (approved by USFWS and the State of Hawai‘i Department of Land and Natural Resources Division of Forestry and Wildlife (DOFAW) in 2011) to

Comment	Response
<p>which KIUC has and is implementing extensive Hawaiian petrel research and breeding colony management (KIUC).</p>	<p>support incidental take authorization from USFWS and DOFAW for the continued operation and maintenance of all existing KIUC facilities and the installation, operation, and maintenance of certain future KIUC facilities for a period of up to 5 years for three federally and State-listed species: ‘Ua‘u, ‘A‘o, and ‘Akē‘akē. Funding associated with the STSHCP and incidental take permit has supported current seabird monitoring work by KESRP both in terms of colony monitoring and the monitoring of take at powerlines and through light attraction, as well as predator control by National Tropical Botanical Gardens and Natural Area Reserves System.</p>
<p>We do not recognize the reference to the Regional Seabird Conservation Plan (KIUC).</p>	<p>A full reference for the plan is U.S. Fish and Wildlife Service 2005 Regional Seabird Conservation Plan, Pacific Region. U.S. Fish and Wildlife Service, Migratory Birds and Habitat Programs, Pacific Region, Portland, OR. http://www.fws.gov/pacific/migratorybirds/PDF/Seabird%20Conservation%20Plan%20Complete.pdf.</p>
<p>For all “in prep” documents, the text should identify where the public can obtain copies of the draft version relied upon by the EA authors (KIUC).</p>	<p>The Kaua‘i Island-wide draft Recovery Plan (in prep) is still under internal agency review and is not publicly available. Information regarding the anticipated contents of the Kaua‘i (Long-Term) Seabird HCP (KSHCP) (in prep) comes from that project's website and not from a draft document.</p>
<p>The draft EA references the Newell's shearwater and Hawaiian petrel recovery draft 5-Year Action Plan. Was the plan ever finalized? The EA should provide an update (KIUC).</p>	<p>The 5-Year Action Plan has not been finalized.</p>
<p>The draft EA states that the KSHCP that is being developed by DLNR-DOFAW in cooperation with USFWS is intended “to provide interested parties with a streamlined approach to secure legal authorization of unavoidable incidental take of endangered and threatened seabirds on the island of Kauai.” The draft EA should indicate whether</p>	<p>The language quoted is paraphrasing the following information published on the KSHCP website: “With funding from the federal section 6 grant program, DLNR-DOFAW is preparing the KSHCP to provide interested businesses and agencies with a way to attain legal authorization and coverage for unavoidable incidental take of endangered</p>

Comment	Response
<p>the KSHCP is intended to serve all parties that may require incidental take coverage or will be limited to a subset (KIUC).</p>	<p>and threatened seabirds due to light attraction (and other utilities) and to achieve net conservation benefits for Kauai's endangered and threatened seabirds” and “The central benefit to participating businesses and agencies will be obtaining legal coverage for existing facilities and planned projects under the KSHCP through participation in a streamlined and cost-saving permitting process” (http://www.kauai-seabirdhcp.info/#; accessed on August 31, 2015). In addition, another section of the website provides “Who needs an Incidental Take Permit and HCP? Any non-Federal entity whose otherwise lawful activities will result in the take of a listed species.” (http://www.kauai-seabirdhcp.info/background/apply.html accessed on August 31, 2015).</p>
<p>It would be helpful if the final EA explained what negative impacts the authors believe replicating a pre-laying nutrient gathering for captive birds would cause and the basis for their opinion (KIUC).</p>	<p>‘Ua‘u require a pre-laying exodus at sea to gather nutrients to make eggs, which local seabird experts believe would be difficult to replicate in captivity.</p>
<p>The USFWS has asked KIUC to install predator-proof fencing around colonies on land that is difficult to access and that it does not own. It does not seem appropriate, therefore, for USFWS to use topographical challenges, the need for further discussions with landowners, and costs as the basis for excluding additional fencing from further consideration in its own EA. The inclusion of a more comprehensive discussion would provide readers with a fuller understanding of the challenges that all parties engaged in efforts to conserve the species must overcome (KIUC).</p>	<p>The installation of fencing (either predator-proof or ungulate-proof) to enable enhanced predator control was evaluated for consideration, but was eliminated for purposes of this EA because it would not meet the purpose and need for this project. The logistical challenges associated with the installation of a new fenced area (e.g., planning, funding, and timeframes for construction) render this option unavailable for immediate implementation.</p>
<p>The Alternative A section implies that 'current management efforts' are being conducted by USFWS, which is incorrect. This section should clarify that current management efforts in the four described colonies are being conducted by KIUC, in accordance with its STSHCP (KIUC).</p>	<p>Alternative A is required to look at current management activities, including those supported by KIUC, in accordance with its STSHCP. We recognize the role of KIUC in implementing the current management efforts at the proposed source colony sites.</p>

Comment	Response
<p>The EA should indicate the nature of the efforts to increase predator control operations, the party or parties that are making them, and the anticipated timeline for the increases (KIUC).</p>	<p>KIUC funds seabird-specific management actions at four known seabird breeding colonies: Hono o Nā Pali Natural Area Reserve (North Bog, Pihea, and Pōhākea) and Upper Limahuli Preserve. Actions include predator control and invasive plant removal through its STSHCP. KIUC provided additional funding to increase predator control operations in the Natural Area Reserves in 2015, including an increase in the number of predator control staff.</p>
<p>In Alternative C, it is asserted that translocation has been part of recovery planning since 1967 for ‘Ua‘u. Accordingly, this section should also then describe what specific ‘Ua‘u translocation efforts have occurred in the 48 years since 1967 (KIUC).</p>	<p>Translocation has been part of the recovery planning since 1967 for ‘Ua‘u (USFWS 1983), though no previous attempts at translocation have been made.</p>
<p>The text under the subheading “identification of source donor colonies” should credit KIUC. It is important that readers understand how important the external support by KIUC has been for the field work and other research that KESRP and others have conducted over the past 4 years (KIUC).</p>	<p>We recognize KIUC's support and the importance of the existing management to the feasibility of a translocation.</p>
<p>Alternative C proposes to remove chicks from colonies currently being actively managed by KIUC through its STSHCP. This section fails to describe how many chicks would be removed and translocated annually, and over what period of years the annual removals would occur (KIUC).</p>	<p>If the species has never been translocated before, protocol in New Zealand is to conduct a trial transfer of a small number of chicks (e.g., ≤10) to test burrow design and hand-rearing methods, which is the approach proposed for ‘Ua‘u. If fledging in the first year is successful based on criteria from previous successful translocation projects and on expert advice (specifically, 7 of the 10 chicks removed fledge from the new colony), then increasing the number of chicks to be moved in each of the next 4 years to a maximum of 20 chicks per year would be considered. Under the proposed translocation plan, three to four chicks would be taken from each source colony in year one, and up to seven chicks per year from each source colony in years 2 through 5 (with a maximum of 10 in the first year and a maximum of 20 in years 2–5).</p>

Comment	Response
<p>In the short-term, increased human visitation to the colony to locate, monitor, capture, tag, and remove chicks will likely have significant adverse impacts on the breeding colony. In the long-term, fewer birds will return to the colonies that KIUC-funded measures are protecting and this will reduce potential colony productivity in future years when the translocated birds fail to return to their birth colony (KIUC).</p>	<p>Removal of chicks from existing colonies is not anticipated to have a significant negative impact on the source colony. A maximum of 100 ‘Ua‘u chicks would be moved over a 5-year period (a total of 10–20 per year depending on the year), with only 3–7 nestlings removed from any individual colony each year. Because new burrows are found each year, the proportion of breeding nests actually affected could be lower. Chicks would be removed prior to the time when they are most vulnerable to predation by cats (when they are exercising outside the burrow prior to fledging); removal of chicks would arguably decrease their vulnerability to predation as compared to chicks remaining in the colony even with existing predator control. Simons (1984) estimates a 27 percent rate of survival for wild chicks, which would represent 1 out of every 3.5 chicks that could be expected to return to breed. Thus, the removal of 3 to 7 chicks from a specific colony could represent the loss of one to two adult breeding birds per year, which is roughly comparable to the number of adults lost to predation at each source colony every year (and in some colonies, more adults are lost to predation; see Table 3.1 in the EA). In other seabird species, much higher proportions of nestlings have been transported from at-risk colonies to protected sites for conservation purposes (including nearly 100 percent of the chicks produced by the critically endangered Cahow (<i>Pterodroma cahow</i>) and Taiko (<i>Pterodroma magentae</i>) since each is restricted to a single colony), with no measurable negative impact on the source colony (Carlile et al. 2012).</p> <p>All activities associated with monitoring, collection, and retrieval of chicks will be scheduled to coincide with existing management carried out under the KIUC STSHCP to minimize the total number of visits to the colony and reduce the potential</p>

Comment	Response
	for disturbance.
<p>The EA fails to address the impacts of chick removal on KIUC's mandatory STSHCP mitigation efforts. The success of the mitigation depends not only on improving breeding success, which results in more fledglings, but also in having those fledglings return to that colony to breed. Removing chicks to Kīlauea Point NWR would substantially compromise both the short-term and long-term success of KIUC's mandatory mitigation efforts.</p>	<p>The impact of chick translocation on current or future HCP negotiations regarding mitigation actions at the source colonies is outside the scope of this EA and will be addressed by the appropriate parties during HCP discussions.</p>
<p>Please describe the criteria used to determine whether fledging in the first year “is successful” such that increasing the number of translocated chicks would be considered (KIUC).</p>	<p>As stated in Alternative C, for the first year of ‘Ua‘u translocations, 10 chicks will be removed and transferred to the Refuge. If fledging exceeds 70 percent, then 15 birds will be moved in year two. If fledging of year two birds meets or exceeds 80 percent, then 20 birds will be moved in each of years 3-5 for a total of 100 birds. If fledging is below 50 percent in any given year, the project will be re-evaluated before proceeding. If fledging criteria are not met at any stage, numbers will not be increased until those numbers are met. The number of birds may also depend on whether additional suitable donor burrows can be located. The goal of this project is to transfer a minimum of 50 and up to 100 chicks over a 5-year period. See Appendix C in the EA for more information.</p>
<p>The section on the effects on ‘Ua‘u asserts that the removal of up to 100 chicks from KIUC-managed colonies over 5 years “would not be anticipated to negatively impact the source colony.” This section of the EA fails to identify, or even roughly estimate, (a) how many chicks are likely to be available in any given year within any of the four projected source colonies, (b) how many chicks or eggs are lost to predation annually, (c) the extent to which KIUC's colony management efforts in the source colonies have been effective to date at reducing predation rates and increasing breeding success, and (d) the extent to which KIUC's colony management</p>	<p>See above response and section 4.3.1 of the EA for further clarification on the reasons for the conclusion that chick removal for translocation is anticipated to have a minor impact on the source colony. Chicks would be removed prior to the time when they are most vulnerable to predation (when they are exercising outside the burrow prior to fledging), so that removal would not necessarily be in addition to predation.</p>

Comment	Response
<p>efforts in the source colonies are likely to be effective going forward in terms of reducing predation rates and increasing breeding success. There is no basis to conclude that the removal of 100 chicks will be “minor” compared to existing conditions. Moreover, the removal and translocation of chicks in the source colonies will not supplant, but be in addition to, predation (KIUC).</p>	
<p>The EA fails to address the impacts on ‘Ua‘u and ‘A‘o of increased human activity and disturbance in the source colonies (KIUC).</p>	<p>Translocation would not be anticipated to require substantial increases in human activity or disturbance, as all activities associated with monitoring, collection, and retrieval of chicks would be implemented in conjunction with planned management carried out under the KIUC STSHCP management and translocation itself would require potentially one additional visit for chick removal. The intent is to minimize the total number of visits to the colony and reduce the potential for disturbance.</p>
<p>The EA does not acknowledge the effect that Pacific-wide changes in food supply could have on the population numbers of the success or the planned conservation measures. In view of the increasing evidence that decreases/changes in food supply are having a significant negative effect on the populations of the species targeted by the proposed relocation, this should be discussed in detail (KIUC).</p>	<p>Pacific-wide changes in food supply could have an impact on the ‘Ua‘u population; however, this issue is outside of the scope of the purpose and need for this EA.</p>

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