

Appendix J. Public Comments and Service Responses

In this appendix the Service responds to comments that were received on the James Campbell NWR Draft CCP/EA, July 2011) during the official public comment period from June 30-August 1, 2011. Comments were received via letter, comment card, and e-mail. All substantial comments regarding the Draft CCP/EA are presented below. Some comments have had formatting changes and other minor edits to correct spelling or punctuation, but the majority of comments are as received. Service responses indicate where changes were made to the CCP based on specific comments.

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Comments and Responses

1. Ralph K. Makaiau, Jr., Kahuku Community Association

Comment:

The Kahuku Community Association (KCA) has remained supportive of further expansion of the refuge to > 800 acres and KCA has been consistent in its message for the USFWS to confine its operation within its boundaries to include area flood control. At this time the KCA can support your “Alternative C” plan of the James Campbell NWR Draft CCP subject to the following conditions:

Coastal Strand Dune Habitat: 1) It was agreed that adjacent lands conditions outside refuge boundaries such as sea bird nesting, economic, and/or agriculture (not limited to these conditions) cannot become a burden to the adjacent landowners by USFWS. 2) It was agreed proposed land acquisition acreages were inclusive of buffer acreage or mitigation measures within 800 acres needed to accommodate existing land owners. 3) It was agreed adjacent lands buffer mitigation within the refuge include east, south, and west boundaries apply.

Service Response:

Regarding item #1 above, Goal 3 and its associated objectives and strategies of the Draft CCP outline the actions that we will undertake over the next 15 years to restore and protect coastal strand/dune habitat and upland scrub/shrub to provide safe refuge for endangered 'ilio-holo-i-ka-uaua and threatened honu, as well as provide habitat for seabirds, shorebirds, and migratory birds. Based on our analysis of undertaking these activities, we do not anticipate any direct, indirect, or cumulative effects to adjacent landowners. Regarding items #2 and #3, it is not clear to us what is meant in these comments by the references to buffer acreage or mitigation measures. Language in the authorizing Expansion Act (Pub. Law 109-225) refers to buffer land within the Refuge to help

protect the ecological integrity of the Refuge from surrounding development. This language does not establish any buffer areas within the Refuge affecting existing (i.e. adjacent) landowners and we are not aware of any prior agreements regarding buffer areas. The Refuge will continue to work in a cooperative manner with adjoining landowners to address issues or needs of mutual concern if any should arise in the future. Based on the goals, objectives and strategies proposed in the Draft CCP, we have not identified any actions that will result in significant impacts to the human environment that would require the implementation of mitigation measures.

Comment:

Visitor Services: Visitor count greater than 5,000 and/or 210,000 for education and training is not an acceptable perspective in terms of additional traffic impacts, third-party independent traffic study should be required. It was agreed that multiple beach access routes would be provided in plan for community. It was agreed that multiple beach frontage parks would be provided in plan for community. KCA request land area for community for the purpose as a “bike path” to be set safely apart and paralleling Kamehameha Highway from refuge Kahuku Sugar Mill east boundary to Marconi Road west boundary. KCA request land area for community for purpose of a “passive path” to tour refuge running east to west either at coast line or midway property.

Service Response:

The Service understands that traffic congestion is a concern for north shore residents. Based on State of Hawai‘i tourism data, an average of 1 to 1 ½ million people, both residents and tourists, visit the north shore each year. The preliminary estimate of 210,000 visitors to the Refuge reflects anticipated visitation only if the Visitor Center/Headquarters building is constructed. When constructed, we expect that the majority of visitors to the Visitor Center will be people already traveling along Kamehameha Highway to visit the north shore and our facility will not have a significant impact on the existing traffic levels along the highway. Any planning for the design and construction of the proposed Visitor Center will include necessary coordination with the Hawai‘i Department of Transportation, City and County of Honolulu and Federal Highway Administration, as appropriate, to address infrastructure needs such as turn lanes and acceleration lanes to minimize impacts to traffic flow from this project. A Visitor Services Plan (VSP) will be developed within 5 years of Parcel 3 acquisition. It will include a transportation study which will provide a more detailed analysis of road, infrastructure, and visitation estimates and needs associated with this project, as well as the entire refuge expansion. In anticipation of this plan the Service has already initiated contact with the Federal Highway Administration, which provides transportation planning assistance to Federal agencies.

Regarding beach access routes, the VSP will identify routes and facilities (trails, parking, roads) needed to provide access to the shoreline. While facilities needed to accommodate public access and use along the shoreline will be provided, these public uses and access must be carefully controlled. These facilities will enhance and support appropriate refuge uses such as wildlife observation, wildlife photography, fishing, and interpretation but will not support general recreation uses that may be associated with beach frontage parks as identified in the comment above, such as picnicking, sunbathing, and beach sports.

The Service will explore the possibility of establishing a bike/pedestrian path on the Refuge during the development of the VSP. Any potential plans for a path on Refuge lands along Kamehameha Highway will have to take into consideration that these lands are under commercial leases to the shrimp farms until 2023. Suitable locations for potential public access paths (or trails) will be explored and identified as the VSP is developed.

Comment:

Flood Damage Reduction for Kahuku: It was agreed that land acquisition required USFWS to construct east boundary, approximately 200 acre, floodway buffer zone. It was agreed east boundary, approximately 200 acre, to receive mauka Kahuku watershed runoff inclusive of Kahuku Village east runoff. It was agreed rerouting of makai Kahuku Hospital Ditch and Ō‘hia Stream east around Ki‘i Refuge. Ki‘i Ocean Outlet to be widened according to USACE data.

Service Response:

The land acquisition authorized by the James Campbell Expansion Act of 2005 (Pub. Law 109-225) was not contingent on any prior agreements with KCA or other parties for the Service to construct any of the drainage features described in the above comment. The Expansion Act did include a “finding” supporting the Act that in addition to other identified management priorities, the purchase of new Refuge lands “is necessary to reduce flood damage following heavy rainfall to residences, businesses, and public buildings in the town of Kahuku”. The intent of the original language was to support potential projects that were being evaluated at that time by USACE as part of the Kahuku Watershed Study and Feasibility Report. Subsequently, no flood damage reduction projects were identified by the USACE that would meet required Federal cost/benefit ratios and, as a result, no projects evaluated in the study were eligible for USACE funding.

The Service and the Draft CCP acknowledge that approximately 120 acres along southeastern boundary of the proposed acquisition lands (Parcel 2) historically and currently flood following heavy rain events, serving as a floodwater storage area. This function will remain and a portion of this area is designated in the Draft CCP as the “Walkerville Unit” which is intended to be maintained by the Service during the lifespan of this CCP (15 years) as an area which provides temporary storage of floodwaters. Once all of this land is acquired, the Service will work with the partner agencies and the community to evaluate this area to determine if this function can be feasibly increased or enhanced. As specified in the Draft CCP, any proposed flood damage reduction projects occurring on Refuge lands would be subject to full and separate engineering, environmental, and regulatory review and approval. Goal 7 of the Final CCP outlines our approach for working with partner agencies and the local community to assist with planning and implementing flood damage control measures for the Town of Kahuku.

Comment:

KCA requires ditch maintenance to be ongoing from makai Kamehameha Highway for Ki‘i Stream, Kahuku Hospital Ditch, Ō‘hia Stream/Ki‘i ocean outlet, Kalaiokahepa Stream, Punamanō Springs, Bakahan Stream/Bakahan ocean outlet; all for purposes of flood avoidance,

Service Response:

The Service recognizes the important need to conduct routine and ongoing maintenance on ditches and drainages within the Refuge. In 2010, shortly after being purchased by the Service, major ditch maintenance was conducted by the Refuge on the Ki‘i ditch (referenced as Ki‘i and Ō‘hia Streams) and Punamanō ditch. This work substantially improved the drainage function of these important ditches. Additional work to improve and maintain other ditches and drainages throughout the Refuge will be accomplished on a continual basis. In addition, the Refuge will reevaluate existing infrastructure (i.e., dikes, ditches, pipes, etc.), especially on newly acquired lands, to determine if improvements or modifications can be made to improve drainage through the Refuge. On Bakahan ditch, the ocean outlet for this ditch occurs in an area of major sand accretion repeatedly blocking the mouth of the ditch with heavy deposits of sand. Because of this recurring condition, the ditch is

not suited to be maintained as a major drainage outlet. Additionally, the Refuge does not own all of the land that the ditch crosses. Limited maintenance will occur along that portion of Bakahan ditch owned by the Refuge.

Comment:

KCA request continued engagement of aquaculture leases.

Service Response:

As part of the agreement under which the Service purchased these expansion lands, it is required that the commercial aquaculture leases (shrimp farms) expire in 2023. At that time, these lands will revert to full management responsibility of the Refuge. These lands will be critical to helping the Refuge fulfill its purposes of managing and recovering endangered Hawaiian waterbirds and benefitting other native wildlife.

Comment:

KCA requests implementation of reuse water program for City and County of Honolulu Kahuku Wastewater Treatment Facility.

Service Response:

The potential to reuse treated wastewater being released from the facility to supplement water used to manage Refuge wetlands was previously evaluated by the Service. Due to concerns that even treated water may contain undesirable levels of chemicals and hormones, the use of this water in breeding and foraging areas poses an unacceptable risk to endangered waterbirds, therefore the Service will not pursue this course of action.

2. Phil Bruner, Brigham Young University, Hawai'i

Comment:

Given that JCNWR is a major resource in the recovery plans of Hawai'i's endangered waterbirds, human activity in the wetland areas during breeding season must be strictly controlled. Any new public access roads through and around the wetland areas will likely create increased challenges to limiting disturbance to nesting waterbirds.

Service Response:

The Service recognizes that public access needs to be carefully considered and controlled in order to minimize disturbance to all native wildlife, including endangered species. During preparation of the VSP, avoiding and minimizing the potential impacts or disturbance to wildlife from proposed public uses will be a high priority. We are required to satisfy the consultation requirements of Section 7 of the Endangered Species Act, a process which evaluates effects of refuge management actions, including measures to avoid or minimize impacts to threatened and endangered species. The Service is also required to prepare compatibility determinations (CD) for all proposed uses and these CDs will identify measures to avoid or reduce disturbance to wildlife before these uses would be approved.

Comment:

The greatly expanded perimeter of the Refuge created by the recent addition of surrounding lands will need an increase in Refuge staff not only to manage the wetland but to monitor and control human access on a 24/7/365 schedule.

Service Response:

The Service understands and agrees that the expansion of the Refuge increases our responsibility as a landowner and land manager. This Final CCP identifies additional staff and funding that are needed to fully implement the actions and strategies described in the plan and to meet these responsibilities. The Appendix C, Plan Implementation and Costs, identified the need for 13 additional staff positions, including a full-time law enforcement officer to conduct patrols and enforce regulations.

Comment:

The plan to enhance the newly acquired lands for seabird nesting is commendable but brings with it a separate set of habitat management challenges and shoreline predator/disturbance enforcement. While the shoreline remains open to human activity the protection of dunes, just mauka of the shoreline, will be a challenge. Constant attention to repairing and maintaining the fence line against the effects of sand erosion and the corrosive effect of the marine environment will be itself a huge task. The fence line needs to not only restrict human access but equally or more importantly, restrict access to dogs.

Service Response:

As identified in this Final CCP, establishing fences to reduce predators (including dogs) will be a critical management strategy that needs to be implemented before seabirds can successfully nest on the Refuge. We recognize that proper maintenance of the fence will be an on-going requirement that must be considered and included during project planning.

Comment:

The cost of effectively managing this much larger refuge was not presented in this Draft. Clearly to do all that this Comprehensive Management Plan Environmental Assessment proposes will require a significant financial as well as man-power investment. If the refuge is to protect our native water birds, migratory waterfowl, shorebirds, and other native species (i.e., Monk Seals and Green Sea Turtles). I believe this is only possible with a significant increase funding for not only materials but full time staff.

Service Response:

The Draft CCP identified additional staff and funding needed in order to fully implement the strategies under each alternative. Appendix C of this Final CCP, Plan Implementation and Costs, lists the specific staff positions needed as well as estimated costs for the major projects we have proposed.

3. Brian Bowers, Kubota + Bowers Consulting (Kahuku Village Association)

Comment:

KVA strongly supports Alternative C (Full Restoration and Management of the Refuge Expansion Plans) because it best supports the vision of the Kahuku community as well as KVA. KVA is in strong support of Objective 7.1 in the plan concerning Flood Damage Reduction for the Town of Kahuku. This objective will provide flood mitigation for the Walkerville area and adjacent KVA managed property.

Consistent with the objective of flood mitigation, I have attached a drainage study which was completed on behalf of KVA that shows possible grading that could be completed on the future James Campbell NWR land that may improve the flood mitigation in the Walkerville residential area. We request that this study be incorporated into the final Comprehensive Conservation Plan and the proposed grading be the subject of future engineering and environment studies by the Fish and Wildlife Service to meet Objective

7.1.

Service Response:

The Service understands the long and difficult history that the community of Kahuku has experienced with flooding issues. We believe with our commitment to improve and maintain drainage through new and existing Refuge lands that we can help alleviate and reduce damages from flooding to the community. However, many factors contributing to flooding in Kahuku lie outside of the Refuge and are beyond the control of the Service. The legislative intent of the Expansion Act in including the language “reduce flood damage following heavy rainfall to residences, businesses, and public buildings in the town of Kahuku” was intended to provide a mechanism by which USACE, a Federal agency, could implement flood damage reduction projects in the future on Federal land (the Refuge), if these projects met USACE and Service criteria. As described in the Draft CCP, the 2006 Kahuku Watershed Study conducted by USACE did not identify any viable flood damage reduction features at that time. The Service will continue to work with the local community and appropriate agencies to determine if appropriate and feasible flood damage reduction projects can be designed and constructed on the Refuge. In this regard, the drainage study and grading proposal provided by the commenter does not provide sufficient detail to determine if it is feasible or practical to pursue. It will not be the responsibility of the Service to design and engineer flood damage reduction projects. We have revised Section 2.6.7 of the Final CCP to clarify the strategies to be implemented by Service to assist partner agencies and the local community with planning and implementing flood damage control measures for the Kahuku area.

4. W. Mike Ord

Comment:

I fully support Alternative C. The draft Revised Recovery Plan for Hawaii Waterbirds, Second Draft of Second Revision, 2005 called for removing the threat of hybridization with feral mallards. That said, feral mallards on the Refuge should be shot to minimize further hybridization.

Service Response:

We will support development and implementation of interagency efforts to manage the koloa maoli population. Currently there is no program to cull feral mallards or hybrid ducks on the Refuge. In order for such an effort to be most effective, the project should be Islandwide in scope. The strongest remaining population of pure koloa maoli is on the Island of Kaua‘i. There is on-going research occurring on Kaua‘i to develop strategies to address the hybridization concern. As new information becomes available and techniques are developed and approved, these will be implemented on the Refuge, as appropriate. If new information demonstrates that local (on-Refuge) control efforts may benefit koloa recovery then the Refuge will implement a corresponding control program as funding and staffing allow. Control may include shooting, trapping, or other methods to be developed.

Comment:

I believe USFWS should give top priority to working with the State to ban fishing, of any kind, on the shoreline of James Campbell Refuge because if it not implemented then you can forget hoping to get seabirds nesting on the Refuge in the future.

Service Response:

As described in the Draft CCP, the VSP will address fishing and visitor access to the Refuge-owned and -managed portion of the shoreline. The Service will work with the State to address needs and/or issues related to fishing along the State-owned portion of the shoreline. One proposal described in

the Draft CCP identifies seeking an Executive Order from the Governor of Hawai‘i which would transfer management authority for the State-owned portion of shoreline to the Refuge. This would allow all uses and regulations along the shoreline to be consolidated. The VSP will identify special regulations and closed areas needed to ensure successful seabird nesting. We believe we can allow some level of fishing and still have seabirds nesting in the dune vegetation. The shoreline will be managed to encourage use by nesting seabirds through fencing, predator control, vegetation management, and control of public access and use. Signing, regulation enforcement, and education of shoreline users will be used to minimize conflicts between fishing and seabird nesting.

Comment:

I do not know what 50.CFR27.34 says other than your comments in James Campbell Refuge CCP where aircraft cannot fly over a wildlife refuge but purportedly an aircraft could land in an emergency. Moral to the story is minimize removal of vegetation from the runway where birds can use it but aircraft won't land. Aircraft in trouble can either go to the U.S. Marine base or to Dillingham airfield in Mokuleia.

Service Response:

We believe we can remove pest plants from the abandoned runway to improve habitat conditions for seabirds and still prevent unauthorized use by aircraft. Currently, the edges of the runway are dominated by exotic invasive vegetation (pest plants). Most of these are thick stands of small trees or shrubs that disrupt and minimize airflow (breezes and wind) across the runway. Adequate airflow is a critical consideration for seabird management. Seabirds, both young and adult, need adequate airflow to help regulate their body temperatures to keep from overheating during extended periods of time on the ground during nesting and rearing. Current plans are to remove most of the invasive plants on and along the runway while also retaining the less dominant native vegetation. This will maximize both the surface area available for nesting seabirds as well as critical airflow across the runway. Since O‘ahu is a relatively small island with limited airport and flying facilities we believe through outreach and education of the flying community, as well as enforcement of regulations, we will prevent unauthorized use of the abandoned runway and potential conflicts with seabirds and other migratory birds.

Comment:

Pest management should be swift and lethal or USFWS goes into the poor house with repetitive actions. I would recommend absolutely minimum live trapping and maximum lethal trapping. I think USFWS should aggressively control the number of Cattle Egrets within the Ki‘i unit especially during the four waterbirds’ primary nesting time (March-September).

Service Response:

The Refuge will be adding and increasing the use of lethal trapping techniques. Our current pest (predator) management program includes a variety of control techniques for several targeted species but currently does not include lethal trapping. The predator control program will continue to evolve as new data and techniques are integrated into the program. Based on recent information, lethal traps will improve the program’s effectiveness and efficiency (both time and cost), which is a primary consideration.

As identified in the strategy for Goal 1, Objective 1.1, it is our intention to eliminate nonnative roosting trees of the invasive cattle egret. Care must be taken to not also impact native ‘auku‘u during this process. Periodic cattle egret control, primarily by shooting, has taken place on the Ki‘i

Unit in past years and control will continue as needed to minimize the impact of these invasive predators to endangered waterbirds.

Comment:

Proposal to place new HQ/VC/EE facility in the vicinity of Marconi Road and Kamehameha Hwy would not be my first choice because it would be tucked away in a corner. My choice would be where Mings Dynasty is now where you could get a bird's eye view of the greater majority of the Refuge. Second floor manager's office could give him close to a 180 degree view of the refuge.

Service Response:

A final location for the proposed HQ/VC/EE has not been determined. The proposed site at the intersection of Marconi Rd. and Kamehameha Hwy. has tentatively been identified due to several important site considerations. These include site elevation above the 100-year flood plain; proximity to utilities; potential for access via Marconi Road other than directly on/off Kamehameha Highway and adequate size of the site (8-12 acres) to accommodate a large building, entrance roads, and sufficient parking areas. The Ming Dynasty site referred to in the comment, while more centrally located on the refuge, is a much smaller site and currently under lease until 2023, so would not be available as a potential HC/VC/EE site until after that year.

Comment:

New Zealand style predator proof fencing is essential for Ki'i unit (ponds A to G) to replace the existing fencing. Any rat or mongoose fenced in could probably be eliminated within one year with appropriate lethal trapping. By doing this you get two immediate benefits: (1) maximum breeding potential for all four waterbirds with minimal disturbance and (2) big dollar savings where refuge personnel can devote their energies to other parts of the refuge for maximum results.

Service Response:

The Draft CCP identifies the need to increase the use of fencing on various parts of the Refuge as an effective predator control tool. Specific sites and design of any new fencing has not been determined yet. A predator-proof fence such as suggested in the comment is a possibility and will be considered for Ki'i Unit. Several important issues need to be evaluated before such a project would be initiated. A primary consideration is the potential effect on the endangered waterbirds themselves. 'Alae 'ula, in particular, and also 'alae ke'oke'o, often pass through the existing large mesh fence to feed, nest, or loaf on both sides of the fence. A predator-proof fence would restrict these movements thereby altering territories and habits of these birds at Ki'i.

The increased use of fencing, including predator-proof fencing, should result in improved cost efficiency of the predator control program. The use of new fences will be implemented in stages so we can evaluate benefits and effectiveness.

Comment:

It is essential to prioritize what is done, when and how to maximize results and to preclude spending money time and time again on the same project.

Service Response:

We fully recognize the need to prioritize management activities to maximize results and utilize limited staff and funds efficiently. This Final CCP identifies additional staff needs and as well as funding needed for major projects.

5. Peter Donaldson

Comment:

The #1 priority should be to provide habitat for endangered waterbirds and, if possible, to remove the stilt, coot, moorhen, and duck from the endangered list. Beyond that, FWS needs to increase access to the refuge. Without improved access, there will be little public support for the refuge. Without ongoing public support, it will be difficult to maintain programs to protect habitat.

Service Response:

Protecting and managing endangered waterbirds is the purpose of the Refuge and the majority of management actions are directed in support of at these species with the intention of contributing to supporting recovery efforts and ultimately de-listing (removing) these birds from the Endangered Species list.

As discussed in the Draft CCP, the new expansion lands will offer many new opportunities for public use and access to the Refuge. As identified under Goal 5, Objective 5.1, a VSP will be developed within 5 years of the final land acquisition which will specifically evaluate and identify the facilities (e.g., parking, trails, and/or boardwalks) needed to provide these opportunities. Public awareness and support for the Refuge is a high priority in our outreach efforts.

6. Ken & Darlene Fiske

Comment:

In a review of alternate plans A, B, and C, we are in favor of Intensively Managed Wetland habitat indicated under Alternative C; protecting Natural Wetland Habitat under Alternative C; restoring Remnant Wetland habitat under Alternative C; Coastal Strand Dune Habitat under Alternative C; and Scrub and Shrub Habitat under Alternative C.

Scientific data: Those items under Alternative C are fine.

Cultural and historic resources: I am in agreement with Alternative C.

Flood damage reduction for Kahuku: I am in accord with Alternatives A, B, and C.

Service Response:

We appreciate the support expressed by these comments.

Comment:

Expansion of lands: Land acquisition should be completed or expanded to include the acreage fronting on Marconi Road. Acquisition is more important than building new facilities, other than the maintenance shop and greenhouse.

Service Response:

It is a high priority for the Service to complete the land acquisition as soon as possible. The current contract agreement with the James Campbell Company does include the land parcel adjacent to Marconi Road (Parcel 3) referred to in the comment above. Acquisition funds have been obligated and set aside for this purchase. Planning and construction of new facilities would not detract from the effort to complete the land acquisition. All funding for new facilities would be separate from land

acquisition funds and therefore would not reduce the amount of funding set aside for the purchase of the two remaining parcels.

Comment

Visitor Services: I am not in agreement with Alternative C nor Alternative B. I am in accord with Alternative A. Alternatives B and C are not in keeping with the primary focus of restoration and protection of wildlife habitat.

Service Response:

We believe that we can achieve habitat restoration and protection while also accommodating a certain amount of wildlife-dependent recreation on the Refuge. This approach is consistent with the National Wildlife Refuge System Administration Act which encourages providing opportunities for wildlife-dependent recreation when compatible with refuge purposes. Public use activities will be incorporated into the expansion land restoration with consideration for protection of endangered species and habitat protection. Compatibility determinations and other environmental compliance requirements will be completed prior to construction of any new facilities. As previously described, public awareness and support for the Refuge are key aspects of outreach efforts and a critical need for future conservation efforts. Both environmental education and interpretation are integral to promoting environmental stewardship and endangered species' protection and, as such, are important aspects of the visitor services program. In addition, the preferred alternative (Alternative C) describes full restoration and management of Refuge habitats over the next 15 years, thereby maximizing benefits to wildlife.

7. Norma Creps

Comment:

I support Alternative C as it provides full restoration and management of Refuge expansion lands. Of the three choices it provides the largest protected area for endangered waterbirds and maximizes the acreage for seabird nesting site improvements. I also like that Alternative C includes a new HQ/VC/EE facility and that cultural and historic awareness and environmental education are included in the plan.

Service Response:

We appreciate the support expressed by these comments.

Comment:

With the loss of access to many of our public beaches here on O'ahu due to private development of nearshore areas I am hesitant to support transfer of management authority over the shoreline adjacent to the Refuge to the USFWS, a Federal entity. Popping monk seals are afforded protection under the ESA and the MMA and nesting sea turtles as well. I do not support a complete closure of the shoreline areas however I personally would support enforcement of current laws and regulations and increased education and outreach.

Service Response:

If this course of action is pursued, the Service will work closely with the State to develop an Executive Order (EO) from the Governor of Hawai'i which would transfer management authority for the State-owned portion of shoreline to the Refuge. This would allow all uses and regulations along the shoreline to be consolidated. This EO could only be implemented with the full support and approval of the Governor. We do not intend to impose a complete closure of the shoreline corridor.

However, we believe that consolidating coastline regulations and management will offer greater benefit and protection to sensitive coastal resources. Proposed management actions (i.e., temporary site-specific seasonal closures to protect honu or seabird nests) will facilitate enforcement of existing laws for the protection of threatened, endangered, and other native species.

8. Sylvia Pelizza

Comment:

Select Alternative C. It provides the greatest opportunity to benefit the resource and American public.

Service Response:

We appreciate the support expressed by these comments.

9. Meredith Speicher

Comment:

As part of the refuge infrastructure, are there opportunities to explore a pedestrian and bike path that would allow visitors from the surrounding communities to walk or bike to and into the refuge? Ideally, connecting the new bike path from Lāi'e to Mālaekahana to the north shore bike path would offer a unique opportunity to connect the communities and allow a non-motorized transportation option for those wishing to visit the refuge. A trail or path within the refuge could be done in a way to avoid impacts to wildlife and could reduce potential new impacts associated with visitor travel and parking and reduce the overall carbon footprint of visitors on the refuge. Such a path could be a key link in recreational opportunities for walkers, hikers, and bike riders on a safe path on the north shore of Oahu.

Service Response:

The Service will explore the possibility of establishing a bike/pedestrian path on the Refuge during the development of the VSP. Plans for a path will have to take into consideration that land areas along Kamehameha Highway will be under commercial lease until 2023. The use of bicycles on the Refuge in the future may be a viable alternative to motorized transportation.

