

EXHIBIT 2 - Comments and responses on specific hunting units in Draft Rules Exhibits 1-11		
Hawaii		
Issue	Concerns and comments	Department response
Opening palila mitigation areas to game bird hunting in Units A and G	5 letters opposed adding one or both mitigation areas to game bird hunting units because of the very sensitive nature of this habitat for palila recovery. Comment: The shooting, trampling, presence of dogs and other disturbances are not conducive to restoring habitat and populations of this bird that is so close to extinction. The two mitigation areas should be designated as permanent palila wildlife sanctuaries and managed appropriately. There are extensive game bird hunting opportunities within the Mauna Kea Forest Reserve, in fact far in excess of demand. Comment: The MOU for the Puu Mali mitigation parcel reportedly requires that the parcel be used for hunting if it will not impact palila. It would be extremely difficult if not impossible to demonstrate no impact without a rigorous, continuous monitoring program that extends far beyond where hunting will take place.	<p>The department recognizes that the purpose of the establishment of the Puu Mali mitigation parcel, as identified in the MOU, is primarily for the recovery of Palila. However, the MOU addresses the issue of public bird hunting in the parcel and provides for that use if it does not negatively affect the restoration of the parcel for Palila recovery. Further, the Puu Mali parcel represents public trust lands, which, under the state constitution, shall be managed for the benefit of the people of Hawaii. It is the position of the department that bird hunting should be allowed in the parcel if it can be conducted in a manner that does not interfere with the restoration of the parcel.</p> <p>The department conducted an analysis of the potential conflicts and compatibility of bird hunting and restoration in the parcel and concluded that bird hunting was not likely to interfere with restoration if restricted to certain portions of the parcel with appropriate regulation of hunting activities. The department concluded that bird hunting should not be permitted in the central portion of the parcel where restoration activities are most intensive. The department recommends that the proposed rule amendment be adopted to allow bird hunting as proposed. Staff will be assigned to monitor the use of the parcel to document any undesirable effects. If conflicts with restoration are identified bird hunting can be restricted to address the problems.</p>
	1 letter said that the proposed extension "is incorrect and must be extended to the full described area defined in 'Final Environmental Impact Statement--Saddle Road (State Route 200) Mamalahoa Highway (State Route 190) to Milepost 6' (Hereafter referred to as FEIS...Failure to abide by the provisions of the FEIS leaves the participating agencies open to litigation." This letter also said that the references to Puu Mali Mitigation Site and Kaohe Mitigation Site in the draft rules for Chapter 122 and in associated Exhibit 2 are "being adopted as rule without any definition, purpose or restrictions. There is no enabling law or rule that allows this specific inclusion. Therefore, their references must be deleted from the rules."	The hunting rules do not represent any aspects of the EIS or its findings. With regard to the proposed establishment of the Puu Mali mitigation site as a PHA, authorization to do so is provided in Chapter 183D-4, Hawaii Revised Statutes.
Changing designation of Unit A from Mauna Kea GMA to Mauna Kea Forest Reserve with liberalized game mammal take.	13 letters and recorded comments opposed the proposed changes, including one letter with 15 signatures attached and one with 9 names typed at the bottom. With 1 exception (which centered on lack of Ramseyer format in the draft rules maps), opposition focused on the resulting likelihood of area closure or game animal eradication, and on a preference for keeping this a sustained-yield area for pig hunting. 1 additional letter did not mention the change to Forest Reserve, but opposed ending bag limits for sheep and goats and asked what the scientific justification is for this step. Comment: This should remain one pig per hunter per day and special seasons should also apply. Comment: I oppose the change in the rules taking away the name Game Management Area to Forest Reserve in all areas on all islands.	The subject area was established as a Forest Reserve and later as a GMA and is presently considered by the department to be both. We therefore recommend that the designation as a GMA be recognized in the rules. With regard to bag limits, the department intends to comply with the Palila court orders for sheep and goats but may set bag limits and conditions for other game species for game management purposes.
Unit A	Comments received expressing concerns about liberalized hunting.	Conditions are liberalized in unit A in compliance with the palila court orders for the purpose of restoring Palila Critical Habitat. The scientific justification for that action is provided in the court documents and in numerous scientific publications (see, e.g., Revised Recovery Plan for Hawaiian Forest Birds (2006). See also Exhibit 1, Item 1
Unit A	1 person stated that because the map in the draft rules exhibit does not show Mauna Kea GMA, Ramseyer format is not adhered to and the rule change is therefore invalid: No substantial countermanding rule change deleting the original MKGMA has been enacted since the original 1951 rule, so all official DLNR hunting maps relating to Unit A are legally required to reference MKGMA, which is not done in the map in the draft rules exhibit. This letter also said that the Board cannot adopt policy that would have the effect of amending a rule without following HAPA requirements.	The department has followed all required procedures under chapter 91 (HAPA) for a rule amendment. According to section 91-4.1, the department, "shall prepare a certified copy of the rule changes according to Ramseyer format." This requirement has been followed.
Unit A	Comment that another public hearing may be required if substantial changes are made to the rule after a public hearing, and that DLNR's primary function in the MKGMA is game management. Deleting the MKGMA rule designation is a substantial change of land use and emphasis, so if the GMA is deleted, that act meets the test requiring another public hearing.	The department has followed all required procedures under chapter 91 for a rule amendment, including holding public hearings for all substantive proposed changes.
Unit A	1 comment suggested reevaluating public hunting as a use in Unit A because of high conservation values, to assure that conservation of native flora and fauna is given the greatest consideration in managing for nonnative game species. If hunting is not removed from units B, C, and K, then the writer supported keeping Unit A open daily and year-round, with no bag or season limits for mammals and game birds.	See Exhibit 1, Item 1
Unit A	1 person who did not specify Unit A or any hunting area in their comment said that "If changing the name to Forest Reserve means that the department will better manage areas for all uses then we support it...uses of the land and the number of users continues to increase." 1 person expressed grave concern about the palila and their habitat: Please remove all ungulates from the palila habitat and fence it securely as soon as possible.	The department concurs with the concerns expressed for the recovery of Palila and intends to comply with the court order to remove all sheep and goats from Palila Critical habitat and to implement the Revised Recovery Plan for Hawaiian Forest Birds (2006) for the recovery of Palila.

Opening bird hunting on Wednesdays and Thursdays in Big Island Units A, G, PTA and private lands	3 comments supported this change, while 1 expressed concern: Comment: This especially benefits retirees and people employed by the tourism industry (such as in West Hawaii) who have to work on weekends. Comment: I'm glad to see this; my question is why can't it just be every day of the week. As the gentleman gave before, most of us who are retired...to pile everybody on a couple of days just seems to be looking for trouble. And why end on Martin Luther King Jr. Day instead of January 31st, that kind of takes the math out of it, just November 1 to January 31. Comment: The history was that a lot of hunting lands bordered plantations or farms, so it was done on weekends and holidays, for safety reasons. I would like to see it like on the mainland, we go hunting birds seven days a week. It's not too much hunting, it lessens the pressure and you can do better management that way.	The department conducted a survey of licensed hunters designed to make an assessment of the level of support among hunters for the addition of week days to the game bird season. The survey found that the majority of hunters do support the addition of 2-3 weekdays and the board approved the addition. The department recommends that the proposed addition of W-Th be adopted based on support from the majority of hunters.
	Comment: The general consensus of the bird hunting community regarding the 2007/2008 hunting season in Mauna Kea GMA, Kaohe GMA, and PTA, when Wednesday/Thursday hunts were allowed, was that it was dismal. Reinstating the Wednesday/Thursday hunts without regard to predictive seasonal weather patterns, correlative statistical analysis, actual bird counts and adjustment of allowable game takes will once again become a poor substitute for good game bird management and risk affecting the quantity of hatchling brood stock. I urge you to reconsider this proposed rule change of instituting Wed/Thurs hunts without any qualifications.	The department does conduct monitoring of game bird populations and the biotic and abiotic factors that potentially influence those populations and analyze those data to guide management. Preliminary data on the W-Th addition does not suggest that it results in more hunters overall. The department recommends that the proposed amendment to add W-Th be adopted and followed by monitoring to determine whether the game bird populations are able to sustain the addition of those days.
Hunting in Unit A for game birds and rifle hunting for mammals at the same time	5 letters opposed the change, including one letter with 15 signatures attached. Opposition focused on safety of both dogs and other hunters, and suggested this could be solved with rifle hunting for mammals on weekdays and bird hunting on weekends during bird season.	All hunters are required to follow strict safety protocols, including completion of a certified hunter safety course maintaining a valid hunting license. The department also notes that bird hunting and big game hunting areas and times overlap in many western states.
	Comment: Restricting firearm mammal hunting during bird season to above treeline does not protect bird hunters since projectiles from a rifle can travel great distances.	All hunters are required to follow strict safety protocols, including completion of a certified hunter safety course maintaining a valid hunting license. The department also notes that bird hunting and big game hunting areas and times overlap in many western states.
	Comment: Dogs are at particular risk depending on their color. Some hunters will take a long-distance or fleeting-identification shot. Chukar hunters and dogs remain in jeopardy above and below "treeline" whatever that means. This rule creates a dangerous situation that I believe would not be acceptable with the waivers we sign on our hunting licenses.	All hunters are required to follow strict safety protocols, including completion of a certified hunter safety course maintaining a valid hunting license. The department also notes that bird hunting and big game hunting areas and times overlap in many western states.
ATVs in Unit A	1 comment outlining problems: Since ATVs have been allowed in the Mauna Kea GMA, the roads have become really bad, and the ATVs do not stay on the roads. They are making their own trails, damaging the landscape, speeding on the roads, and hunters using ATVs makes enforcement harder.	ATVs: Under section 13-123-22 (4)(C), ATVs may be used only on roads that are constructed, maintained, and opened for vehicular use. The department recognizes the potential impacts of ATVs on roads and strives to maintain the roads for public use. To the extent that ATVs may be illegally used of roads and damage natural resources, the department seeks to enforce all applicable laws and prosecute violations. The department recognizes the limitations of personnel and funds that may prevent us from achieving desired levels of maintenance and enforcement and is committed to securing the resources needed to improve those capacities. Recent trends have seen an enhancement in the department's management capacity and we are optimistic that those trends will continue. With regard to Unit A, the use of ATVs is also regulated and permitted under the forest reserve rules, chapter 13-104, and may be prohibited if their use creates unacceptable damage to roads and resources.
Unit A and Kau Forest Reserve should not be public hunting areas	1 comment: These two areas are highly sensitive and intact areas that are home to native and listed species. These areas should be managed for these resources with priority given to conservation, as other areas are available for hunting.	See Exhibit 1, Item 1
Hunting in Unit B	1 letter suggested that public hunting be removed from Unit B (Piha section) because of the high conservation value of the areas and their proximity to Hakalau Forest NWR and Laupahoehoe NAR, and supported implementing a management scheme to enhance endangered species and recovery efforts there. If this is not done, the writer supports changing management to no bag limits and year-round daily hunting and no season limit for mammals and game birds.	See Exhibit 1, Item 1
	1 person opposed removing unencumbered lands of Manuka Kalaumana and Kipahoehoe from Unit B. Comment: I think all unencumbered state land should be left open for hunting.	The subject lands are still available for public hunting, they are being proposed to be redesignated as Unit K since they are contained within larger sections of unit K.
Hunting in Unit C	1 letter suggested that public hunting be removed from Unit C (Hilo Forest Reserve Laupahoehoe and Piha section) because of the high conservation value of the areas and their proximity to Hakalau Forest NWR and Laupahoehoe NAR, and supported implementing a management scheme to enhance endangered species and recovery efforts there. If this is not done, the writer supports adding goats as game mammals to be taken, with no bag or season limits and daily hunting; also daily year-round hunting with no bag or season limits for game birds.	See Exhibit 1, Item 1
Removing the requirement for telephone reservations for Unit C	7 letters and recorded comments came in, all in opposition. Three of these, one with 15 signatures attached, also suggested a limit of eight hunters per day for Piha and 12 per day for Laupahoehoe. Opposition to eliminating reservations was based on the small size and popularity of the unit. Comment: I'm opposed to any changes in area C. There should be game wardens up there every weekend. Funny, we go up there and there's dog guys in there and we have to call in to Honolulu to report it? That's stupid. They'll never catch anybody that way.	After employing the telephone reservation system for many years the department has found that the system is used by only a very small number of hunters while requiring significant personnel resources to maintain. The department recommends that the amendment be approved as proposed.
Unit C take limits	3 comments requested a change of bag limit from two pigs per hunter per day to one pig per hunter per day 1 comment supported daily hunting vs. weekend/holidays only.	The department does not concur. The unit is designated for no dogs, weekends and holidays only, and usage in these areas is relatively low. Since this results in generally lower harvest the department prefers to allow a higher bag limit when possible. See Exhibit 1, Item 1

Removal of Haao Springs from Unit D	4 comments, all opposing. Comment: This is a popular hunting area for local Kau residents. Comment: A structured management rule should be implemented rather than a full closure. Comment: I oppose any closing of any areas you're proposing right now because our island is constantly shrinking and what we have we want to hold on to.	Haao Spring Restricted Watershed would still be open for hunting and is now included in an expanded Unit B, with the same hunting rules as the nearby Kau Forest Reserve.
Unit D take limits/hunting	1 comment encouraged daily hunting of mammals with no bag limit. 1 comment supported daily hunting vs. weekend/holidays only.	See Exhibit 1, Item 1
	1 comment suggested reevaluating public hunting as a use in Unit D because of high conservation values, to assure that conservation of native flora and fauna is given the greatest consideration in managing for nonnative game species. If hunting is not removed from units B, C, and K, then the writer supported keeping Unit D open daily and year-round for mammals with no bag limit, and open daily and year-round with no bag or season limits for game birds.	See Exhibit 1, Item 1
Unit E designations	3 letters, including one with 15 attached signatures, agreed with the designation change to Puu Anahulu GMA, East Section. These letters and 2 more said Pohakuloa Training Area should continue to be designated as a GMA with specifically numbered hunting areas, and that the areas should be more specifically listed. Comment: If the numbered areas are removed, the DLNR or the military will be able to close any area to hunting since it will not be listed in the regulations as having to stay open. The 1964 lease says the area shall be managed for hunting, so it should be sustained yield. 2 letters said Area 21 should not be removed as it was open for hunting in the past.	The department concurs that PTA hunting areas should be identified on the maps with specifically numbered hunting areas. With regard to sustained yield, see Exhibit 1, Item 1. With regard to Area 21, that parcel is federal land, the department has no jurisdiction to manage hunting there.
Unit E, take limits in Kipuka Ainahou/Mauna Loa GMA	12 recorded comments and letters, one with 15 signatures attached and one with 9 names typed at the bottom, opposed liberalizing take limits in Kipuka Ainahou (the letter with multiple signatures specified take limits in Mauna Loa GMA, including Kipuka Ainahou). Comment: by extending the bag limit for Kipuka I feel that the department is now going for eradication and not management, same for Kaohe area. Comment: Kipuka Ainahou is one of the last archery areas where game is plentiful and chances of success are good. My grandfather told me that goats were abundant years ago. From the stories, they were all trapped out at night due to poor game management and enforcement. We have also noticed a rise in wild dogs which is becoming a threat to safety. Comment: It should stay the same one pig, one goat and one sheep!	See Exhibit 1, Item 1
	1 comment supported daily hunting vs. weekend/holidays only, and a few comments supported the continuation of the March-October archery-only designation.	See Exhibit 1, Item 1
	1 letter that favored eliminating all take restrictions on wild ungulates described the area (since it became an archery hunting site with small bag limits) as a breeding ground for mouflon, which compete for food resources with the nene in the Kipuka Ainahou Nene Sanctuary.	See Exhibit 1, Item 1
	1 letter said that reference to Mauna Loa GMA in the game bird and game mammal rules should be corrected to Mauna Loa Forest Reserve as there is no Mauna Loa GMA pursuant to HRS 183D-4.	The subject area was established as a Forest Reserve and later as a GMA and is presently considered by the department to be both. We therefore recommend that the designation as a GMA be recognized in the rules.
Unit E, PTA check-in, check-out times	3 letters, including 1 with 15 signatures attached, requested that Pohakuloa Training Area conform to state regulations regarding legal hunting hours. Comment: Recently PTA check-in and check-out times have been at the military's discretion, not as indicated in the State lease.	The department is reviewing its agreement with PTA for hunting in that area and expects to clarify conditions for use through discussions and a revised agreement.
Unit F additions	3 letters, including one with 15 attached signatures, stated agreement with the addition of Puu Waawaa Forest Reserve and Puu Anahulu GMA, West Section, and supported youth and disabled archery hunts there. At least 2 other letters expressed support for the youth hunt among comments on other hunting areas. Comment: I am for the youth hunt on the other side, Puu Lani side. Hopefully you guys can keep that really well managed.	Department concurs
	1 person wrote that they would like the entire area, Puu Waawaa Mauka and Makai to be labeled a GMA and opposed use of rifle in Unit F. Comment: This should be GMA and not a Forest Reserve because the area is a hunting area and changing the wording to GMA will require the DLNR to manage the area for hunting and conservation.	Although the PWW FR is designated as a FR, the department intends to manage PWW FR and PAH GMA for game production and sustainable yield, has secured authorization under the federal endangered species act to do so, and is seeking authorization under state laws to do so.
Unit F: Puu Waawaa Mauka	6 letters, including 1 with 15 attached signatures, commented on the lack of clarity in the Mauka rules or asked specifically that the Mauka area be opened: Comment: If the Mauka portion is not added for the general archery season, the area cannot be opened for hunting per section 123-4. Comment: Page 75 does not mention the Mauka areas, only Makai. The Mauka area rules need to be stated and clarified. Comment: I am extremely upset that the Puu Waawaa mauka area is no longer open for hunting, for years now. It seems to be multi-use, I see hikers and runners in there. That is a hunting area and it should be opened. Comment: Why is Puu Waawaa Mauka not slated to be opened at all in your new rules, when it used to be open for archery season and bird season? Comment: I request that the mauka section be added for the general archery season even at a limited capacity.	Mauka is proposed to be open for youth and disabled hunt in the puu lani safety zone. The department does not recommend that Puu Waawaa Mauka be opened for regular hunts at the present time in order to allow game to increase in that area. The area will be opened by permit once the population can support the hunt.
Unit F daily hunter limit	4 letters, including one with 15 attached signatures, questioned the 15 hunter per day limit and requested clarification. 1 person directly opposed a hunter limit: This area should not have a cap on the number of hunters. The place is known for big trophy goats and most of us drive from far distances to hunt here. Taking the chance, driving from Hilo and being denied entry because 15 people were already permitted to enter is crazy! Even reserving spots doesn't work because many people will reserve spots and not show up. Comment: The proper number of hunters allowed per day for special youth and disabled archery, general archery, and muzzleloader hunts needs to be clarified and listed for safety reasons and to maximize area use by public hunters. Comment: Is the 15 hunter limit for the youth hunt, or each area, or all areas combined? If the latter it seems like a small number of hunters for the size of the areas.	The department concurs and recommends that the limit be removed from the rules.
	Comment: The allowed limited number of hunters per day would not be needed if 13-123-4(b) [allowing the department to add conditions and restrictions for hunts, etc.] is allowed to remain in the present rules.	See Exhibit 1, Item 5

Unit F hunting days	1 comment supported daily hunting vs. weekend/holidays only.	The department recommends that hunting in unit F be weekends and holidays only for the purpose of managing a sustainable level of game in that unit. We appreciate that levels of game may at times increase and warrant additional harvest days. In those cases, the department will issue special hunt permits to allow more hunting opportunities.
Unit G Kaohe, allowing firearms	16 recorded comments and letters, including one with 15 signatures attached and one with 9 names typed at the bottom, opposed changing Unit G from archery only; 1 letter supported adding only muzzleloaders, and 2 supported adding a special muzzleloader or handgun season (but no rifles). The major objections were safety (use of firearms in the area is a safety risk because of non-hunters not wearing hunter orange, bisecting access roads, proximity to Saddle Road) and the popularity of Kaohe as an archery-only site with good concealment and a high number of animals that is open daily. Additional concerns were that allowing in firearms would essentially eliminate this as an archery site. Comment: Designating this area for rifle would necessitate the use of blaze orange garments. Camouflage is necessary for success in an already challenging means of taking game.	The department concurs that the use of rifles for public hunting in this unit is not desirable but notes that the area is within Palila critical habitat and therefore subject to the Palila court orders. The department recommends that the unit be archery, muzzleloader, and shotgun with slug only. Feral animal control for compliance with the court orders will be accomplished using staff and public hunters by special permit throughout the year.
	Comment: I would rather we work on expanding the mammal population in other areas and open new areas, if possible, instead of splitting resources or having to choose between gun hunters and archery hunters. Comment: 90% of the public hunting is opened up to rifle, muzzleloading, and archery and there's less than 1% that's opened to only archery, and I have really strong feelings about turning that area over to the firearm hunters.	The department concurs that the use of rifles for public hunting in this unit is not desirable but notes that the area is within Palila critical habitat and therefore subject to the Palila court orders. The department recommends that the unit be archery, muzzleloader, and shotgun with slug only. Feral animal control for compliance with the court orders will be accomplished using staff and public hunters by special permit throughout the year.
	Comment: The unit's dense foliage and hilly terrain, as well being located too close to Saddle Road is most definitely going to get someone killed. I see similar issues on the other outer islands.	The department concurs that the use of rifles for public hunting in this unit is not desirable but notes that the area is within Palila critical habitat and therefore subject to the Palila court orders. The department recommends that the unit be archery, muzzleloader, and shotgun with slug only. Feral animal control for compliance with the court orders will be accomplished using staff and public hunters by special permit throughout the year.
	2 comments suggested having special lottery hunts or short seasons allowing handguns and muzzleloaders to be used if game populations exceed the carrying capacity of Kaohe GMA. Comment: I am not opposed to using muzzleloaders in Unit G and would like to see a seasonal open hunting period implemented on a yearly basis. Muzzleloading hunting is just as difficult as bow and arrow because it has to be loaded from the barrel and there is only one shot. The sabot travels only a short distance compared to a rifle or handgun.	The department concurs and recommends that the rules be amended to specify archery only from September through June, muzzle loaders from July through August, and feral animal control using staff and public hunters by special permit throughout the year.
	Comment: Since we have lost so much archery-only acreage within the last year (PTA and now Kaohe), perhaps DLNR should mitigate this by finding new appropriate archery-only hunting areas.	See Exhibit 1, Item 19
	Comment: This change would eliminate my ability to hunt an archery only area. Many hunters need to work weekends and holidays. The change would also lead to more overcrowding in the remaining archery only areas that are open weekends and holidays.	The department concurs and recommends that the rules be amended to specify archery only from September through June, muzzle loaders from July through August, and feral animal control using staff and public hunters by special permit throughout the year.
Unit G pig hunting season	3 letters, one with 15 attached signatures, opposed year-round hunting for pigs. Comment: The Sierra Club lawsuit against the State of Hawaii included only sheep and goats. Since pigs were not mentioned in the lawsuit, Kaohe pigs should be managed for game and limited to one per day per hunter, and the season July-December	Department concurs and recommends a limit of one pig per hunter per day.
Unit G bag limits	1 letter opposed not having bag limits for Units G, E, and K, specifically for sheep and goats.	See Exhibit 1, Item 1
Unit H checkout time	1 person wrote that the 4:30 checkout notation shown for the Kulani Buffer zone was established when there was an adjacent active prison. With the prison now closed, it should be deleted.	The future of the former prison remains in question and discussions suggest that it may resume its former use. Department recommends the 4:30 time remain until the use of the site is determined.
Unit H hunting days	1 comment supported daily hunting vs. weekend/holidays only.	See Exhibit 1, Item 1
Unit I hunting days	1 comment supported daily hunting vs. weekend/holidays only.	See Exhibit 1, Item 1
Unit J, removal of GMA designation	5 recorded comments and letters, one with 15 attached signatures, opposed the change: Unit J should remain a GMA and should include Kapapala Cooperative GMA. Comment: I support sustained hunting so feel the designation GMA should remain. Comment: I feel the wording GMA must remain to protect management control by means of public hunters to be protected by rule of law. I support sustained hunting in this area as an absolute right to the citizens of Hawaii. Comment: It should remain a hunting area, I oppose any closing.	The purpose of the J designation is to identify cooperative game management areas, which are, by definition, private lands or leased lands for which the department has established agreements to provide access and opportunities for public hunting. Kapapala GMA is still a unit J GMA for bird hunting but no agreement with the landowner exists for mammal hunting. The former units at PWW and PAH are no longer unit J since they are now state lands managed by the department as FR and GMA. The former Kaohe lease has been set aside as mitigation for the saddle road realignment pursuant to an agreement under the federal ESA.
Unit J, participating landowners	1 letter said "It is not believed that Kahua and Ponoholo Ranches are open to mammal hunting."	Concur, the units have been removed while the department seeks to renew agreements.
Unit K, NARS, bag limits	Most of the 49 people who wrote letters asking for more ungulate control supported removing all take limits on ungulates not only in NARS but on all state-managed lands or all native ecosystems (see comments under "Game mammal take restrictions"). 2 recorded comments and 1 letter with 15 attached signatures opposed removing bag limits in Unit K. 1 additional letter opposed removing bag limits specifically for sheep and goats in Unit K.	See Exhibit 1, Item 1
	1 letter said that hunting should be removed from this Natural Area Reserve altogether, since the purpose of the area is conservation	See Exhibit 1, Item 1

Unit K, Mauna Kea Ice Age prohibition on use of hunting dogs	1 letter with 15 signatures attached opposed removal of Unit A requirements (dogs not permitted) in Mauna Kea Ice Age. Comment: Mauna Kea Ice Age is located in the middle of Unit A. The Board needs to clarify whether dogs will be permitted for mammal hunting in the Mauna Kea Ice Age area.	The department prefers to keep the conditions for IA NAR consistent with those of the other K units on Hawaii, which do allow dogs for hunting.
	Kauai	
Issue	Concerns and comments	Department response
Safety zones	1 person's recorded comments touched on Kauai safety zones: My first comment is the Polihale access road. On your maps these are designated as safety zones. With the eradication program of the corn, you're allowed hunting access onto these lands so the designation as a safety zone is a little confusing. That official designation should be somehow addressed.	The designated safety zone at the Kekaha Agriculture Association lands permits public hunters to traverse the agriculture lands to access the Kekaha Game Management Area with an unloaded firearm. It also prohibits the discharge of a firearm toward the agriculture lands.
	Second, you have opened archery hunting within the State Park area of Kokee. There should be safety zones around the leasehold cabins and the state rental cabins	Pursuant to section 13-123-21 (5), all lands within 50 feet of any inhabited building is a safety zone. The cabins at Kokee are not shown on the maps due to the map scales but nevertheless do have safety zones around them. The department will post additional signs in the area for clarity.
Unit A hunting	Comment: Thomas Kaiakapu said he's trying to bring down the goats and everything. I feel it's too small an area to manage all those goats down there, not enough food. Why not open that for rifle instead of only muzzleloading. We can hunt deer with rifle there.	The department's intention is to increase the bag limits and lengthen the black powder hunting season. Hunting Unit A - Kekaha Game Management Area is a sustained-yield management unit where the goal is to provide optimal hunting recreational opportunities and to maintain a healthy game herd.
	Comment: You guys changed the legal requirements from a single horn per side to a fork horn or better. I would like to see it go back to a single. My friend and I have both killed deer with one per side, mature healthy animals that only happened to have one antler per side. So I think the restriction of a fork horn is not necessary.	The department's intention to go with the "forked horn or better" rule in Hunting Unit A - Kekaha Game Management Area only. This will help improve the overall health of the buck herd. All other hunting units including B, D, E, F, H, and J will have be either sex bag limits. The "forked horn or better" rule will not apply there.
Unit A boundary change	1 written comment and 2 recorded comments opposed moving the boundary to the left side of Makaha Ridge Road. Comment: This would make unit H even smaller than it is now and complicate hunting with dogs in unit H because dogs might cross the road. Comment: The game warden will stay on the road and when the dogs pass he's going to wait for you and nail you for them, that's his job. Comment: Leave it to Kalalau Valley.	The department concurs and recommends that the boundary remain as before.
	A second letter, saying it represented most of the hunters on Kauai, written by a hunting association president, suggested the following adjustment: We understand amending the division to the Makaha Ridge Road due to the Critical Habitat boundary. We foresee hunter and enforcement issues arising due to the physical nature of the land and suggest that the boundary change be made but that hunting rules that apply to Unit H also apply to that area of Unit A south of the Makaha Ridge Road.	The department concurs and recommends that the boundary remain as before.
Designating Mokihana Ridge and Waimea Canyon as Unit B	5 letters, one with 9 attached signatures, and 1 recorded comment opposed or strongly opposed designating Mokihana Ridge and Waimea Canyon as Unit B. 1 letter more generally pointed out that the proposed change would pose a problem for hunter access. Comment: Unit B is proposed to be closed from May through September. Including Mokihana Ridge and Waimea Canyon in Unit B blocks the main access point through which hunters can legally transport firearms to Unit E1 and E2. This would defeat the purpose of opening all of Unit E to year-round hunting to increase hunting pressure and protect the watershed. Comment: To block access to proposed Unit E2 with dogs and horses any part of the year is wrong. Mokihana being put under Unit B blocks access 6 months a year. When hunters have access all year they are better able to find the pigs and hunt them. The biggest change I've seen in this area is from the invasive weeds. Much more devastating than any pig damage.	The department concurs and recommends to change the pig hunting season in Unit B to year-round; Fridays to Mondays.
	Comment: Mokihana Ridge is a traditional dog and knife area for the west side community and is perhaps the best quality GMA on the island. Why regulate the pig hunters? They need to run their dogs every week, most from horseback. Goats spilling over from the west side of the canyon threaten the integrity of the GMA and hunters need to be allowed to control them legally year round. I would rather see it grouped with E1 than Unit B.	The department concurs and recommends to change the pig hunting season in Unit B to year-round; Fridays to Mondays.
	Comment: I believe the Waimea Canyon area that is Unit B should be open all year long for goat and pig hunting. When the soil is gone it will be impossible to replace the plants. It would be easy to replace goats and pigs to an area. The drought brought about unbelievable devastation from the goats. We witness 10,000's of cubic yards of soil sliding off the palis and falling rocks became a very constant and real threat. Young hunters don't climb the palis like the old timers did; the pigs like to hide on the palis during the day.	The department concurs and recommends to change the pig hunting season in Unit B to year-round; Fridays to Mondays.
	Comment: Given the popularity of Mokihana Ridge with local pig hunters, as well as the access needs of Unit E2, we recommend that the area remain as it is; open year-round to the use of dogs without need for special permits. However, if the area is added to Unit B as proposed, we recommend an additional condition allowing hunters with valid camping permits for Waiialae Cabin to pass through Unit B year-round with their dogs and weapons.	The department concurs and recommends to change the pig hunting season in Unit B to year-round; Fridays to Mondays.
	Comment: The way you're doing this makes no sense, if you're going to make things more liberal, help us out that way. But don't take something away, change from year-round to six months out of the year. My main concern is leaving Mokihana Ridge Unit E, if you are going to hunt E2 you cannot access through Unit B. And I think this thing should be more user friendly for everybody.	The department concurs and recommends to change the pig hunting season in Unit B to year-round; Fridays to Mondays.
	Comment: I highly recommend that Unit B be open all year. This would also help access to the Koaie critical habitat area via Kuku Trail.	The department concurs and recommends to change the pig hunting season in Unit B to year-round; Fridays to Mondays.

Unit B boundary at Unit F	1 person commented on this boundary: The Unit B boundary is a 600-foot contour and I feel it should be moved higher and you should allow more rifle hunting on the Niihau side of the river. Starting in 1997 the deer moved down into Unit F and it's getting all red now because of the amazing amounts of animals. If you bump up the contour, the rifle hunters have more of a chance of getting those excess goats.	The department recognizes that goat numbers in unit F may need to be controlled but prefers to keep the unit as archery and issue special control permits using firearms when necessary.
Unit C take restrictions	1 person said that Unit C should have no bag or season limits for pigs and hunting days for pigs and goats should be daily: Unit C is adjacent to the Hanalei National Wildlife Refuge, which was established to protect and manage endangered species. Liberal hunting would help meet the purpose of the Refuge.	See Exhibit 1, Item 1
	1 person said the opposite: There should be no Fridays added to what it is now, instead they should close the Monday. The area is overhunted now, we don't have game species like we had in the past. There should be sections that should end hunting in the valleys certain times of the year. We cannot kill everything and our kids get nothing.	See Exhibit 1, Item 2
Daily hunting in Units D and J, Kokee State Park	1 person said that although the area needs more hunting pressure, it may cause problems for those doing resource management in the forest during the week, which include 4th and 5th graders. Comment: Most hunters would be okay with the work, but there are some that could become confrontational, especially if we are treating strawberry guava. This would not be a good experience for volunteers, who also might be intimidated by dogs racing through the forest bent on killing something, or by archers in Unit J. I'm not sure what a good solution would be; perhaps just adding Friday and Monday instead of every day of the week.	Department concurs. The unit is a state park with high use. Recommend hunting days to remain on weekends and State Holidays due to the high non-hunting public use including hiking, biking and camping.
Unit E	1 letter said that Unit E should stay the same. Comment: Changing Unit E would limit access to other areas. See also comments under Unit B.	See Exhibit 1, Item 1
Unit F	In my opinion Unit F should have no goats. One look at the devastation and you can't help but agree. Before the goats Unit F was very beautiful, and healthily vegetated. And had pigs up in the palis during the day and deer grazing day and night and leaving no visible damage to the plant life. The goats that crossed makai of Transformer Ridge are 2/3 of the way to the first house in Waimea Valley. In 2005 a 2-ton boulder hit this house and it cost the state over \$800,000 in rock fall mitigation, putting up a rock net. When and if the goats get to this area, rock falling will be an every day event. 12 years ago I tried raising goats on the pali adjacent to our family farm and within 4 months had to get rid of them because of the rock-falling problem.	The department recognizes that goat numbers may become undesirably high in this and other areas and intends to create special permitted hunts to bring those numbers down.
Unit G goats and deer	Now that the goats are culled back, I notice goats healthier and there are still some good billies out there. Meat quality has improved. There was an idea long ago to increase deer numbers, then cull the goats. I believe that time is close. Public hunting has proven itself capable of controlling goat numbers if allowed.	The department recognizes that goat numbers may become undesirably high in this and other areas and intends to create special permitted hunts to bring those numbers down.
Unit H deer	3 people expressed reservations about or opposed increased bag limits because of the unit's popularity with deer hunters. Comment: Perhaps a fall season or at least a fall buck season would be more prudent. Encouraging more harvest of does throughout the year would contribute to a population that is in balance with its habitat while allowing bucks more opportunity to reach trophy potential. Comment: The bag limit in Unit H should stay the same, and the seasons should stay the same. The boundaries should not be changed also, it should stay to Kalalau Valley stream to back up mauka to Kalalau. With the deer moving back and forth you won't get them all, but during calving time, you run dogs you're going to kill the keiki deer.	Concur, the department recommends seasons for dogs Dec-Jul, no dogs Aug-Nov.
	Comment: Halfway through the dog season the deer move across the road to Kalaupuhi. When Unit H closes they open Kalaupuhi which will chase the deer back to Unit H. You can't get them all that way. Have you considered trapping them and moving them to Unit A or some other place? Guys who hunt in Unit A say they don't see anything. I am just totally against eradicating animals like what's going on in Unit H.	The department concurs and recommends keep the current boundary unchanged.
	1 person suggested pushing dogs back to December, since dogs are now allowed in November when the bucks are in rut.	Concur, the department recommends seasons for dogs Dec-Jul, no dogs Aug-Nov.
NARS, Alakai liberalized hunting	1 letter specifically supported this change. Comment: Allowing more public hunting in these high quality native ecosystems is simply the right thing to do. I highly approve of opening the remote Alakai to daily hunting. It would be great too if Waialae cabin had a smokehouse.	See Exhibit 1, Item 1
Lanai		
Issue	Concerns and comments	Department response
Allowed use of crossbows by disabled hunters is not clear.	1 letter said that disabled hunters who elect to use crossbows should be allowed to use them in Lanai units 1 and 2 as well as unit 3. Comment: It was not clear to me during the public hearing what this policy will be.	Use of crossbows for permitted disabled hunters will follow the archery rules.
Exhibit 7 does not refer to sex of animals to be taken and allows only 1 deer or mouflon	1 person wrote that current rules allow for a second tag. Comment: Increased bag limits would help avoid the overabundance of game, especially mouflon which resulted in the high death rate during the 2010 drought	Additional tags may be issued as conditions permit.

Ewe hunt	1 comment: We desperately need the youth hunt.	Concur, department proposes a youth hunt for both Axis deer and Mouflon sheep.
Maui		
Issue	Concerns and comments	Department response
Removing Maui NARS from public hunting areas	Several of the comments requesting more ungulate control overall expressed support for the proposed changes to hunting in NARS as a needed step	See Exhibit 1, item 1
Molokai		
Issue	Concerns and comments	Department response
Removing Molokai NARS from public hunting areas	Several of the comments requesting more ungulate control overall expressed support for the proposed changes to hunting in NARS as a needed step	See Exhibit 1, item 1
Unit D is not clear in its designation; watershed must be protected	1 person wrote that it would provide greater transparency if there was greater discussion of how unit D is either a cooperative hunting area or state controlled lands as a legacy of the condemnation of the Meyer lands. Comment: I understand continuing with the status quo but encourage the DLNR to work with the family to resolve the long-term management of these lands. The Waihanau watershed is essential to the Kalaupapa settlement as the well is located at the base of this valley. Also the valley is one of the most diverse areas botanically remaining on the island.	The department is working to resolve this land issue.
Exclusion of N5 and N6 as mammal hunting	1 comment supported this exclusion as the right step. Comment: This clarifies the intention of their designation as NARS and enables partnership staff to manage them accordingly	See Exhibit 1, item 1
Oahu		
Issue	Concerns and comments	Department response
Removing Oahu NARS from public hunting areas	Several of the comments requesting more ungulate control overall expressed support for the proposed changes to hunting in NARS as a needed step	See Exhibit 1, item 1
Access to Oahu hunting areas	1 person wrote that it is unfair to expect North Shore residents to drive around the island or hike in 4-1/2 miles to access the major public hunting in their area. Comment: Though guns and dogs may endanger other area users, there is no reason not to allow archers access.	Access is allowed to the area. Hunters can access the PHA via the access road or the Kealia Trail. The access road/Kealia Trail is open to the public for non-motorized bike or pedestrian access.
	1 person asked, if Pahole NAR closes, how hunting area B (which used to be E?) will be accessed, as there is no access through Mt. Kaala Road. Comment: You can hike through but if you cannot legally carry a firearm or archery equipment...	Currently, there is no public access to Mokuleia F.R. Hunters may access if they have permission from surrounding private landowners following rules in ch. 123. Hunters can still contact the NARS Manager for a hunting permit, or to gain permission to access Mokuleia F.R. through Pahole.
	1 person wrote that the two hunting areas at Kaena Point with vehicle parking have chain gates across the entrance to the actual hunting area. Comment: Can an exception for motorized vehicles be made so the disabled like me can use an ATV or moped? Just this past Veteran's Day holiday I saw a fellow hunter walking in the bush near the parking area with the aid of a cane. Like me he couldn't venture far down the hilly dirt road.	ATVs are not permitted in Kuaokala GMA. Vehicular access is available on the Kuaokala Road. In addition, the Kuaokala GMA has numerous access roads for hunters which may be driven by 4 wheel drive vehicles. The roads are maintained to allow for vehicle access, only street legal vehicles are allowed on access roads, which includes city registration, valid insurance and safety check. Areas outside the Kuaokala Road system are not maintained for public use and may be utilized for rotational grazing and motorized vehicles are not permitted. In addition, the Air Force, which controls access to the site, only allows registered automobiles through the site.
Unit B should have no bag limits	Parts of Unit B are near the Oahu Forest National Wildlife Refuge, which was established to protect and manage endangered species. Liberal hunting would help meet the purpose of the Refuge.	Department recognizes need to protect resources and recommends year round daily hunting with no season limits. A bag limit of 2 animals per hunter, per day is recommended for public opportunity. See also Exhibit 1, Item 1.
Unit C should have no bag limits and hunting should be daily	Parts of Unit C (Ahupuaa O Kahana State Park) are adjacent to or near the Oahu Forest National Wildlife Refuge, which was established to protect and manage endangered species. Liberal hunting would help meet the purpose of the Refuge.	The area is a State Park and subject to use for purposes other than public hunting. The department will evaluate use to determine whether year round daily use is safe, feasible, and effective.