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

May 22, 2026

**SUBJECT:** Section 106 and Section 6E-8 Consultation for County of Hawai'i for Watershed Protection and Recharge, Island of Hawai'i, TMKs (3) 9-7-001:001 (por.), (3) 6-1-001:001 (por.), (3) 6-2-001:025 (por.), (3) 6-2-001:002 (por.), (3) 6-3-001:002 (por.), (3) 4-9-015:001 (por.), (3) 6-3-001:005 (por.), (3) 4-9-013:001 (por.), (3) 6-2-001:093 (por.)

To Whom It May Concern,

The County of Hawai'i Department of Water Supply (DWS) is proposing to work on the project listed above with funding through congressionally directed spending, awarded by the National Oceanic and Atmospheric Administration (NOAA) Office of Habitat Conservation (OHC) Restoration Center. DWS, with the assistance of the Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR-DOFAW) are consulting with Native Hawaiian Organizations and others related to historic properties or knowledge of Hawaiian practices, as required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties include archaeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, and buildings and structures with significant association.

DWS and DOFAW are partnering with NOAA OHC to conduct a review of this project to comply with Section 106 of the NHPA and its implementation of regulations 36 CFR §800. We would like to invite you to be a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your organization or community, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

The project areas are within the Ho'ili Wai Unit (TMK (3) 9-7-001:001 (por.) of the Ka'ū Forest Reserve, and the 'Eke Unit (TMKs (3) 6-1-001:001 (por.), (3) 6-2-001:025 (por.), (3) 6-2-001:002 (por.), and (3) 6-3-001:002 (por.), Laupāhoepahoe Nui Unit (TMKs (3) 4-9-015:001 (por.), (3) 6-3-001:005 (por.), (3) 4-9-013:001 (por.)), and Koaia Unit (TMKs (3) 6-2-001:025 (por.), (3) 6-2-001:093 (por.), and (3) 6-2-001:002 (por.)) of the Kohala region, on the Island of Hawai'i.

The proposed project involves various actions specific to each management unit:

- Ho'ili Wai Unit:
  - o Fence maintenance – maintenance and repair as need for 8 miles (13,240 meters) of fence for two years. Fences will be checked quarterly, with six additional checks budgeted to ensure staff can respond in a timely manner to wind or storm events,

totaling eight mandatory and six weather-dependent checks proposed during the project term.

- Ungulate control – employment of all ungulate removal techniques outlined in the Ka‘ū Forest Reserve Management Plan towards the goal of zero ungulates. Currently, this includes six self-deporting traps in unit and will soon increase to seven traps. These traps are set in the fence, and once the trap is triggered, the trapped animals can only leave the trap through a one-way door into the surrounding forest reserve. Self-deporting traps will be maintained, and these traps will be re-baited quarterly or as needed. Additionally, staff will check over 500 small traps set throughout the unit.
- ‘Eke Unit:
  - Fence maintenance – inspection and maintenance of 7,227 meters of existing perimeter fence three times per quarter (monthly) over the two-year term. This fence requires more frequent checks because it is accessible to hikers and there may be vandalism.
  - Ungulate control - hunting, trap deployment, and trap checks three days per quarter (monthly). This essential maintenance will ensure that any potential breaches in the fence do not escalate to repopulation in the unit.
- Laupāhoehoe Nui Unit:
  - Fence maintenance – inspection of 8,967 meters of fence once per quarter.
  - Ungulate control – trap checks (and reset if needed); 150 small traps once per quarter.
  - Invasive weed removal – sweep 3 acres per quarter for a total of 24 acres swept and treated over the two-year contract period.
  - Vegetation monitoring – tracking changes in native biodiversity and forest regeneration following pig removal by monitoring native and non-native vegetation coverage annually for a total of two times during the two-year contract period using relevé and belt transect survey methods.
- Koaia Unit:
  - Native planting: planting 2,400 seedlings to increase biodiversity and density for improved incipient weed prevention and forest establishment.

DOFAW has made the determination that these project actions will have no significant impact on the environment and published an environmental assessment exemption notice on May 8, 2026. The project actions were determined to be exempt under General Exemption Type 3, Part 2, #1, General Exemption Type 3, Part 1, #3 and #5, and General Exemption Type 5, Part 1, #2.

Once the consultation period is over, and if there are no major concerns presented, DOFAW will initiate the project actions. No artifacts are expected to be encountered. However, if any sites or artifacts are discovered, all work will stop, the proper authorities will be notified, and an assessment of significance will occur.

If you are interested in participating in this undertaking as a consulting party, want to provide comments on the proposed project Area of Potential Effect (APE) and any historic properties in the APE, or want to suggest additional key contacts, please respond by June 21, 2026, via email to [Emma.Yuen@hawaii.gov](mailto:Emma.Yuen@hawaii.gov).

We value your assistance and look forward to your response.

Sincerely,

/s/

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

TMKs affected:

Island of Hawai'i

(3) 9-7-001:001 (por.), (3) 6-1-001:001 (por.), (3) 6-2-001:025 (por.), (3) 6-2-001:002 (por.), (3) 6-3-001:002 (por.), (3) 4-9-015:001 (por.), (3) 6-3-001:005 (por.), (3) 4-9-013:001 (por.), (3) 6-2-001:093 (por.)



Figure 1: Location of the Koiaia, 'Eke, and Laupāhoehoe Nui Units.



Figure 2: Location of the Ho'ili Wai Unit.