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DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 13th, 2021

**SUBJECT: Invasive Mangrove Removal at Paialoa Fishbond
Paialoa Fishpond, Moloka'i, HI 96748**

To whom it may concern,

The Department of Land and Natural Resources Division of Forestry and Wildlife (DOFAW) is proposing to work on the project listed above with funds from the U.S. Fish and Wildlife Service under the National Coastal Wetland Conservation Grant program (NCWCGP). At the Service's request, DOFAW has assumed responsibility for completing steps to help ensure compliance with Section 106 of the National Historic Preservation Act, including consultation with Native Hawaiian Organizations and others related to historic properties or knowledge of Hawaiian practices. Historic properties include archeological 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.

The Division of Forestry and Wildlife will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 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/or 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.

DOFAW proposes to remove approximately 3.32 acres of invasive mangroves from the Paialoa wetlands near Kamalo on Moloka'i. This will be done in the area adjacent to the existing fish pond. The Paialoa fishpond was surveyed in the early 1900's and was about 35 acres in size. In the 1950's there was some infilling on the east, west and mauka sides as part of a proposed marina and resort development, reducing the size to about 19 acres. In 1963 the seawall was damaged and filled in with mud. In November 1969, extensive dredging of up to 1.5 million cubic yards occurred. Much of the dredged material was used to fill in about half of the adjoining Paialoa fishpond. In the 70's further erosion/sedimentation and significant dozer backfilling reduced the fishpond area to about 4 acres. In 2015 it was found that the original

fishpond was almost entirely filled in, except for a “big” wetland area of 0.8 acres and a “small” wetland of no more than 0.1 acre in size. The 3.32 acres of project area is part of a larger DOFAW initiative to manage the newly acquired Pua’ahala property and protect threatened and endangered water birds. This activity is necessary to protect and restore the integrity of the watershed and the long-term benefits to wetland and waterfowl health which are believed to greatly outweigh these short-term impacts.

This clearing will require the use of hand tools for cutting of mangroves. Initial removal will consist of a surface level cut, followed by a ground disturbance of 6 to 12 inches to remove the rest. Heavy equipment will use existing dirt roads to park and a winch will pull the cut materials from the project area to be stacked in piles close to the existing dirt roads. Equipment includes a backhoe, excavator, chainsaws, pole saws, weed eaters. Existing dirt roads/pathways on the property will be used to haul cut mangroves to stockpile/burn areas. Removal of mangrove from the cutting area to the burn piles will use cables and a backhoe/winch. Tree removal will be done using above ground cut and removal by DOFAW personnel using cables and backhoe or excavator. Cut trees will be attached by cable and removed from wetland. No equipment will be submerged in wetland to prevent disturbance and some invasive plant control may involve the use of herbicide.

An archeological monitoring plan (AMP) is currently being drafted for this project. Preparation of the AMP is in response to the State Historic Preservation Department’s request and the AMP will include provisions for an on-site archaeologist to be present to monitor all ground disturbing activities. Additionally, an environmental assessment exemption was done in November of 2020. In this exemption, the Board of Land and Natural Resources declared that this project be exempt from the preparation of an environmental assessment under the exemption class 4. Class 4 covers; *Minor alteration in the conditions of land, water, or vegetation*. Within class 4, the work would fall under subsections 2,3, and 8.

Subsection 2 covers; Minor vegetation clearing and management, including mowing, pruning, trimming, and application of federal and state approved herbicides in conformance with label instructions.

Subsection 3 covers; Removal of invasive vegetation utilizing cutting, mowing, application of federal and state approved herbicides in conformance with label instructions, distribution of biocontrol agents already approved and permitted by the State of Hawaii, and other approved methods. This exemption would not apply to issuing permits for initial releases of biocontrol of invasive species which are regulated and permitted by the Department of Agriculture or commercial logging.

Subsection 8 covers; Minor alterations in waters, including restoration of native species and control of invasive weeds, algae, invertebrates, fishes or other invasive aquatic organisms.

Map of Mangrove Removal Area



Figure 1. Paialoa mangrove removal project area.

Your response to this letter- to acknowledge interest in participating in this undertaking as a consulting party, provide comments on the proposed project Area of Potential Effect (APE) and any historic properties in the APE, and suggest additional key contacts- would be greatly appreciated. Please respond by May 14th 2021.

More information on the Section 106 review process is available at <http://www.onecpd.info/environmental-review/historic-preservation/>.

If you have any questions or require additional information, please contact Andrew Taylor at (808) 587-0061 (andrew.taylor.researcher@hawaii.gov). We value your assistance and look forward to your response.

Sincerely,

Emma Yuen
Native Ecosystems Program Manager