ERRATA SHEETS

ENVIRONMENTAL ASSESSMENT FOR

HALEAKALĀ NATIONAL PARK COMMERCIAL SERVICES PLAN

The Haleakalā National Park Draft Commercial Services Plan / Environmental Assessment was made available for public review during a 60-day period from June 28 through August 31, 2012. Public meetings were held by the park on August 15, 16, and 17 in Pukalani, Hāna, and Kīpahulu on Maui, Hawai‘i, respectively. Ninety people attended the public meetings and provided comments, and one hundred and eleven written comment letters were received from individuals, agencies (including federal, state, and county), and organizations.

This Errata consists of two parts. Part 1 comprises corrections and minor revisions to the Environmental Assessment. Page numbers referenced pertain to the 2012 Draft Haleakalā National Park Commercial Services Plan / Environmental Assessment (CSP/EA).The edits and text corrections do not result in any substantial modifications being incorporated into the selected action, and it has been determined that the revisions do not require additional environmental analysis. Part 2 contains responses to public comments on the CSP/EA.

The Errata when combined with the CSP/EA comprises the only amendments deemed necessary for the purposes completing the Final Haleakalā National Park Commercial Services Plan.

TEXT CHANGES

1. **Correction.** Change the EA, page 3, Chapter 3: Affected Environment, to read: “It is organized according to the following topics: natural resources, cultural resources, ~~wilderness character,~~ visitor use and experience, public health and safety, socioeconomics, and park operations.

2. **Addition.** Addition to the EA, page 38, Next Steps and Implementation of the Plan, following the first paragraph under “Implementation of the Plan” to read: “A concessions prospectus will be developed within 12 to 18 months following completion of the plan. A solicitation period will be held for approximately three months, followed by proposal evaluation, offeror selection, and contract award for approximately six to nine months. The transition period is dependent on timing of the award.”

3. **Correction**. Change the EA, page 49, Actions Common to All Action Alternatives, sixth bullet, to read: “~~Kīpahulu Valley Biological Reserve, Ka‘apahu, or Nu‘u areas within the park would continue to be closed to visitor access.~~ *Some areas within the park would continue to be closed to visitor access (e.g., Kīpahulu Valley Biological Reserve, Ka‘apahu, and Nu‘u areas).*”

4. **Correction.** Change the EA, page 53, Alternative A (No Action), to read: “In this alternative, ~~all commercial tours could continue to grow without limits, constrained only by the size of existing parking lots- as required by the 1995 general management plan.~~

commercial use authorizations would be limited by the park's capacity to handle vehicles and people, as required by the 1995 general management plan."

5. **Correction.** Change the EA, page 56, Primary Differences between Alternative B and Alternative A, fifth bullet, to read: "the number of commercial service providers able to offer horseback riding tours in Kīpahulu would be reduced from 2009 levels (there would be no change in ~~road-based~~ hiking or astronomy tour commercial use authorizations."

6. **Correction.** Change the EA, page 60, Primary Differences between Alternative C and Alternative A, fourth bullet, to read: "the number of commercial service providers able to offer horseback riding tours in Kīpahulu would be reduced to one (there would be no change in the number of ~~road-based~~ hiking or astronomy tour providers.)"

7. **Correction.** Change the EA, page 64, Primary Differences between Alternative D and Alternative A, fourth bullet, to read: "the number of commercial service providers able to offer horseback riding tours in Kīpahulu, astronomy, and bicycle tours all would be limited (there would be no change in the number of ~~road-based~~ hiking providers)…"

8. **Correction.** Change the EA, page 70, Mitigation Measures Common to All Action Alternatives, sixth bullet, to read: "use of commercial *seed-free* feed in lieu of grazing if deemed necessary by the superintendent to reduce the potential for introduction of invasive plant species to the park."

9. **Correction.** Change the EA, page 75, Table 6. Comparison of Alternatives, Alternative A (No-action Alternative), Concept, to read: "No change in management of existing commercial tours; ~~no limit on number of CUAs awarded; when the parking lots fill to capacity, commercial vehicles would be turned away~~ *commercial use authorizations would be limited by the park's capacity to handle vehicles and people, as required by the 1995 general management plan.*"

10. **Correction.** Change the EA, page 76, Table. 6 Comparison of Alternatives, Alternative B (NPS Preferred Alternative), Hiking, first bullet, to read: "~~No limit on number of CUAs awarded~~ *The number of CUAs would be limited to 2009 levels*."

11. **Correction.** Change the EA, page 76. Table 6. Comparison of Alternatives, Alternative C, Annual Operating Costs, to read: "$516,000~~,000.~~"

12. **Correction**. Change the EA, page 77, Table 7. Summary of Key Impacts, for Natural Resources—Special Status Species, Alternative A, to read: "With continued use, and probably increased use, by guided groups under alternative A, ~~minor to~~ moderate, long-term, adverse impacts could occur to the endangered Hawaiian petrel, nēnē, Haleakalā silversword, and nohoanu."

13. **Correction**. Change the EA, page 77, Table 7. Summary of Key Impacts, for Natural Resources—Special Status Species, Alternative B, to read: "Overall, alternative B would have a ~~minor~~ *moderate*, long-term, ~~beneficial~~ *adverse* impact on the four listed species."

14. **Correction**. Change the EA, page 77, Table 7. Summary of Key Impacts, for Natural Resources—Special Status Species, Alternative C, to read: "~~Compared~~ *Similar* to alternative A, alternative C would have a ~~minor~~ *moderate*, long-term, adverse impact on the four listed species."

15. **Correction**. Change the EA, page 77, Table 7. Summary of Key Impacts, for Natural Resources—Special Status Species, Alternative D, to read: "~~Compared~~ *Similar* to alternative A, alternative D would have a ~~minor~~ *moderate*, long-term, adverse impact on the four listed species."

16. **Correction**. Change the EA, page 78, Table 7. Summary of Key Impacts, for Cultural Resources—Archeological Resources, Alternative A, to read: "Implementation of alternative A would result in long-term, minor, adverse, and direct impacts on ~~historic structures~~ *archeological resources*. When the impacts of alternative A are combined with other past, present, and reasonably foreseeable actions, there would probably be long-term, negligible to minor, adverse, and direct cumulative impacts on ~~historic structures~~ *archeological resources*."

17. **Correction.** Change the EA, page 78, Table 7. Summary of Key Impacts, for Cultural Resources—Cultural Landscapes, Alternative B, to read: "The impacts of alternative B, in combination with the impacts of other past, present, and reasonably foreseeable future actions would result in short- and long-term, *negligible to* minor ~~to moderate~~, adverse impacts compared to alternative A.

18. **Correction**. Change the EA, page 79, Table 7. Summary of Key Impacts, for Cultural Resources—Historic Structures, Alternative D, to read: "Implementation alternative D would result in long-term, *minor to* moderate, adverse impacts on the ~~cultural landscapes~~ *historic structures* compared to alternative A. When the impacts in alternative D are combined with the impacts of other past, present, and foreseeable actions, there would probably be long-term, *minor to* moderate, adverse impacts on ~~cultural landscapes~~ *historic structures*."

19. **Correction.** Change the EA, page 79, Table 7. Summary of Key Impacts, for Ethnographic Resources and Cultural Practices, Alternative A, to read: "When the impacts of alternative A are combined with the impacts of other past, present, and reasonably foreseeable future actions, the resulting impacts would likely be short and long term, ~~negligible to~~ minor *to moderate*, and adverse."

20. **Correction.** Change the EA, page 79, Table 7. Summary of Key Impacts, for Ethnographic Resources and Cultural Practices, Alternative B, to read: "Overall, impacts on ethnographic resources and cultural practices resulting from alternative B in conjunction with other past, present, and reasonably foreseeable future actions would be short and long term, ~~negligible to~~ minor *to moderate*, and adverse."

21. **Correction.** Change the EA, page 79, Table 7. Summary of Key Impacts, for Ethnographic Resources and Cultural Practices, Alternative C, to read: "Overall, the impacts on ethnographic resources and cultural practices of alternative C in conjunction with other past, present, and reasonably foreseeable future actions would result in short- and long-term, minor *to moderate*, adverse impacts."

22. **Correction.** Change the EA, page 79, Table 7. Summary of Key Impacts, for Ethnographic Resources and Cultural Practices, Alternative D, to read: "Overall, impacts of alternative D on ethnographic resources, in conjunction with the impacts from other past, present, and reasonably foreseeable future actions would be short and long term, *minor to* moderate, and adverse."

23. **Correction**. Change the EA, page 102, Table 13. 2010 CUA Tour Operators, to read:

Kīpahulu ‘Ohana	Hiking	31	~~Not included in the scope of this plan.~~ *0*	31

24. **Correction**. Change the EA, page 102, Table 13. 2010 CUA Tour Operators, to read:

Maui Horseback Tours	Horseback Riding	1245	~~Not included in the scope of this plan.~~ *0*	1245

25. **Correction.** Change the EA, page 114, Table 16. Incident Totals, 2006–2009, to read: “Table 16. Incident Totals, 2006~~-2009~~”

26. **Correction.** Change the EA, page 120, Economic Impact of Park’s Commercial Service Providers, to read: “Within the scope of this plan, ~~26~~ *31* businesses in 2009 were permitted to offer tours within the national park, and they typically provide tours to 15%–30% of Haleakalā National Park visitors in any given year.”

27. **Correction**. Change the EA, page 120, Table 18. Commercial Service Provider Revenues for 2009, to read:

TOTALS	~~26~~ *31*	~~$8,940,000~~ *$8,836,000*	21%

28. **Correction.** Change the EA, page 145, Vegetation, Alternative B, first paragraph under “Analysis” to read: “With a freeze on the number of commercial use authorizations issued at 2009 levels, a ban on guided activities on a couple days, and increased training of guides, guided ~~road-based~~ hiking and astronomy tour groups would still continue to impact vegetation at the summit, but at a reduced level compared to alternative A.”

29. **Correction**. Change the EA, page 147, Vegetation, Alternative D, first paragraph under “Analysis” to read: “Guided ~~road-based~~ hiking and astronomy groups would still trample and crush vegetation.”

30. **Correction**. Change the EA, page 148, Special Status Species, Alternative A, second paragraph under “Analysis” to read: “For all these species it is possible under alternative A that continued use of the park by guided groups, and potentially increased use in the future, would result in ~~minor to~~ moderate, long-term, adverse impacts.”

31. **Correction**. Change the EA, page 148, Special Status Species, Alternative A, third paragraph under “Cumulative Impacts” to read: “When the ~~minor to~~ moderate adverse effects of alternative A are added to the above effects, there would probably be a ~~minor~~ *moderate*, long-term, adverse, cumulative impact on those species.”

32. **Correction**. Change the EA, page 148, Special Status Species, Alternative A, under “Conclusion” to read: “With continued use, and probably increased use, by guided

groups under alternative A, ~~minor to~~ moderate, long-term, adverse impacts could occur to the federally listed Hawaiian petrel, nēnē, Haleakalā silversword, and nohoanu."

33. **Correction**. Change the EA, page 149, Special Status Species, Alternative B, under "Analysis" to read: "~~Thus, although there would be the potential for some individuals of the four species to be lost, injured, or the behavior of the two animal species to be altered, compared to alternative A, alternative B would have less of a long-term, adverse impact on the four listed species—~~. *Nevertheless,* alternative B would be expected to have a long-term, ~~minor~~ *moderate*, adverse impact on the four species."

34. **Correction**. Change the EA, page 149, Special Status Species, Alternative B, third paragraph under "Cumulative Impacts" to read: When the ~~minor~~ *moderate*, adverse effects of alternative ~~A~~ *B* are added to the above effects, there would probably be a ~~minor~~ *moderate*, long-term, adverse, cumulative impact on these species."

35. **Correction**. Change the EA, page 149, Special Status Species, Alternative B, under "Conclusion" to read: "Overall, alternative B would have a ~~minor~~ *moderate*, long-term, adverse impact on the four listed species."

36. **Correction**. Change the EA, page 150, Special Status Species, first paragraph, Alternative B, to read: "When the effects of alternative B are combined with other present and future actions independent of this plan, there would probably be a ~~minor~~ *moderate*, long-term, adverse, cumulative impact on the four federally listed species."

37. **Correction**. Change the EA, page 150, Special Status Species, second paragraph, Alternative B, to read: "While the National Park Service believes that alternative B would have ~~negligible to minor~~ *moderate*, long-term impacts on the four species, the effects of activities in alternative B cannot be uncoupled from other park activities."

38. **Correction**. Change the EA, page 150, Special Status Species, Alternative C, under "Analysis" to read: "~~Thus, although there would be the potential for some individuals of the four species to be lost, injured, or the behavior of the two animal species to be altered, compared to alternative A, alternative C would have less of a long-term, adverse impact on the four listed species—~~.*Nevertheless,* alternative C would be expected to have a ~~minor~~ *moderate*, long-term, adverse impact on the four listed species."

39. **Correction**. Change the EA, page 150, Special Status Species, Alternative C, under "Cumulative Impacts" to read: "When the ~~minor~~ *moderate*, adverse effects of alternative C are added to the above effects, there would probably be a ~~minor~~ *moderate*, long-term, adverse, cumulative impact on these species."

40. **Correction**. Change the EA, page 151, Special Status Species, Alternative C, under "Conclusion" to read: "~~Compared~~ *Similar* to alternative A, alternative C would have a long-term, ~~minor~~ *moderate*, adverse impact on the four listed species. When the effects of alternative C are combined with other present and future actions independent of this plan, there would probably be a ~~minor~~ *moderate*, long-term, adverse, cumulative impact on the four federally listed species."

41. **Correction**. Change the EA, page 151, Special Status Species, Alternative C, second paragraph under "Conclusion" to read: "While the National Park Service believes that

alternative C would have a ~~minor~~ *moderate*, long-term effect on the four species, the effects of activities in alternative C cannot be uncoupled from other park activities."

42. **Correction**. Change the EA, page 151, Special Status Species, Alternative D, under "Analysis" to read: "~~There would be the potential for some individuals of the four species to be lost or injured, or for the behavior of the two animal species to be altered; however, compared to alternative A, alternative D would have less of a long-term, adverse impact on the four listed species .~~ *Nevertheless,* alternative D would be expected to have a ~~minor~~ *moderate*, long-term, adverse impact on the four species."

43. **Correction**. Change the EA, page 152, Special Status Species, Alternative D, to read: "When the ~~minor~~ *moderate* adverse effects of alternative D are added to the above effects, there would probably be a ~~minor~~ *moderate*, long-term, adverse, cumulative impact on these species."

44. **Correction**. Change the EA, page 152, Special Status Species, Alternative D, under "Conclusion" to read: "~~Compared~~ *Similar* to alternative A, alternative D would have a ~~minor~~ *moderate*, long-term, adverse impact on the four listed species. When the effects of alternative D are combined with other present and future actions independent of this plan, there would probably be a ~~minor~~ *moderate*, long-term, adverse cumulative impact on the four federally listed species."

45. **Correction**. Change the EA, page 152, Special Status Species, Alternative D, second paragraph under "Conclusion" to read: "While the National Park Service believes that alternative D would have ~~minor~~ *moderate*, long-term impacts on the four species, the effects of activities in alternative D cannot be uncoupled from other park activities."

46. **Correction.** Change the EA, page 158, Archeological Resources, Alternative B, first paragraph under "Analysis" to read: "Alternative B would freeze the number of guided groups to 2009 levels, prohibit commercial services activities on three to five days a year, limit sunrise commercial services to road-based tours, prohibit road-based tours from using motor coaches, reduce the number of parking spaces for road-based tours (from 13 under alternative A to 8 under alternative B); reduce the number of commercial service providers that can offer ~~road-based~~ hiking and horseback tours; reduce the number of hiking, horseback, and astronomy trips per day for each provider; and require all commercial guides to participate in training and be certified to operate in the park.

47. **Correction.** Change the EA, page 159, Archeological Resources, Alternative C, first paragraph under "Analysis" to read: "Alternative C would limit sunrise tours to road-based tours; reduce the number of parking spaces (from 13 in alternative A to 6 in alternative C) for road-based tours at the summit; ban parking at Red Hill; reduce the number of commercial service providers that offer ~~road-based~~ hiking and horseback tours; limit the number of trips per day each provider could offer tours; and require commercial guides to participate in training and become certified to operate in the park.

48. **Correction.** Change the EA, page 161, Cultural Landscapes, Alternative B, third paragraph under "Analysis" to read: "Alternative B would freeze the number of guided groups to 2009 levels; prohibit commercial services activities on three to five days a year; limit sunrise commercial services to road-based tours, prohibit road-based tours from using motor coaches; reduce the number of parking spaces for road-based tours(from 13 under alternative A to 8 under alternative B); reduce the number of

commercial service providers that can offer ~~road-based~~ hiking and horseback tours; reduce the number of hiking and astronomy trips per day for each provider; and require that all commercial guides participate in training and become certified to operate in the park."

49. **Correction.** Change the EA, page 161, Cultural Landscapes, Alternative B, fourth paragraph under "Analysis" to read: "Alternative B would result in fewer long-term, *negligible to* minor, adverse impacts on cultural landscapes.

50. **Correction**. Change the EA, page 162, Cultural Landscapes, Alternative B, first paragraph under "Conclusion", to read: "As described above, implementation of alternative B would result in long-term, *negligible to* minor ~~to moderate~~, adverse effects to cultural landscapes."

51. **Correction.** Change the EA, page 162, Cultural Landscapes, Alternative C, second paragraph under "Analysis" to read: "Alternative C would limit sunrise tours to road-based tours; reduce the number of parking spaces (from 13 in alternative A to 6 in alternative C) for road-based tours at the summit; ban parking at Red Hill; reduce the number of commercial service providers that offer ~~road-based~~ hiking and horseback tours; limit the number of trips per day each provider could offer; and require commercial guides to participate in training and be certified to operate in the park."

52. **Correction.** Change the EA, page 165, Historic Structures, Alternative B, first paragraph under "Analysis" to read: "Alternative B would freeze the number of guided groups to 2009 levels, prohibit commercial services activities on three to five days a year; limit sunrise commercial services to road-based tours; prohibit road-based tours from using motor coaches; reduce the number of parking spaces for road-based tours (from 13 in alternative A to 8 in alternative B); reduce the number of commercial service providers that can offer ~~road-based~~ hiking and horseback tours; reduce the number of hiking, horseback, and astronomy trips per day for each provider; and require all commercial guides to participate in training and become certified to operate in the park."

53. **Correction.** Change the EA, page 165, Historic Structures, Alternative B, second paragraph under "Analysis" to read: "Continued use of the historic ~~cabins,~~ trails~~,~~ and park road would continue to result in wear and tear and contribute to damage."

54. **Correction**. Change the EA, page 165, Historic Structures, Alternative B, third paragraph under "Analysis" to read: "Alternative B would result in long-term, *minor* ~~moderate~~, adverse, direct impacts on historic structures."

55. **Correction**. Change the EA, page 165, Historic Structures, Alternative B, Conclusion to read: "Implementation of alternative B would result in long-term, *minor* ~~moderate~~, adverse impacts on historic structures. When the impacts of alternative B are combined with the impacts of other, park, present, and reasonably foreseeable actions, there would likely be short- and long-term, *minor* ~~moderate~~, adverse, and direct impacts to historic structures."

56. **Correction.** Change the EA, page 165, Historic Structures, Alternative B, first paragraph under "Analysis" to read: "Alternative C would limit sunrise tours to road-based tour; reduce the number of parking spaces (from 13 in alternative A to 6 in alternative C) for road-based tours at the summit; ban parking at Red Hill; reduce the number of

commercial service providers that offer ~~road-based~~ hiking and horseback tours; limit the number of trips per day each provider could offer; and require commercial guides to participate in training and become certified to operate in the park."

57. **Correction**. Change the EA, page 166, Historic Structures, Alternative D, Conclusion to read: "Implementation *of* alternative D would result in long-term, minor to moderate, adverse impacts on the ~~cultural landscapes~~ *historic structures* compared to alternative A."

58. **Correction**. Change the EA, page 168, Ethnographic Resources and Cultural Practices, Alternative A, Conclusion, to read: "Under alternative A, impacts to ethnographic resources and cultural practices would continue to be long-term, *minor to moderate* ~~major~~, and adverse."

59. **Correction.** Change the EA, page 168, Ethnographic Resources and Cultural Practices, Alternative B, first paragraph under "Analysis" to read: "Alternative B would offer up to four concession contracts for road-based tours; freeze the number of guided groups to 2009 levels; limit sunrise commercial services to road-based tours; prohibit road-based tours from using motor coaches; reduce the number of parking spaces for road-based tours (from 13 in alternative A to 8 in alternative B); reduce the number of commercial service providers that can offer ~~road-based~~ hiking and tours; reduce the number of astronomy trips per day for each provider; and increase training of guides."

60. **Correction**. Change the EA, page 168, Ethnographic Resources and Cultural Practices, Alternative B, Cumulative Impacts, to read: "As described under alternative A, cumulative impacts from all past, present, and reasonably foreseeable actions would be short and long term, *minor to moderate* ~~major~~ and adverse."

61. **Correction**. Change the EA, page 168, Ethnographic Resources and Cultural Practices, Alternative B, Conclusion, to read: "Overall, impacts on ethnographic resources and cultural practices resulting from alternative B in conjunction with other past, present, and reasonably foreseeable future actions would be short and long term, *minor to moderate* ~~major~~, and adverse."

62. **Correction.** Change the EA, page 169, Ethnographic Resources and Cultural Practices, Alternative C, first paragraph under "Analysis" to read: "Alternative C would offer up to three concession contracts for road-based tours; freeze the number of guided groups to 2009 levels; limit sunrise commercial services to road-based tours; prohibit road-based tours from using motor coaches; reduce the number of parking spaces for road-based tours (from 13 in alternative A to 6 in alternative C); reduce the number of commercial service providers that can offer ~~road-based~~ hiking and horseback tours; reduce the number of astronomy trips per day for each provider; and increase training and certification of guides."

63. **Correction**. Change the EA, page 169, Ethnographic Resources and Cultural Practices, Alternative C, Cumulative Impacts, to read: "As described under alternative A, cumulative impacts from all past, present, and reasonably foreseeable actions would be short and long term, *minor to moderate* ~~major~~ and adverse."

64. **Correction**. Change the EA, page 169, Ethnographic Resources and Cultural Practices, Alternative C, Conclusion, to read: "Overall, the impacts on ethnographic resources and

cultural practices of alternative C in conjunction with other past, present, and reasonably foreseeable future actions would result in short and long term, *minor to moderate* ~~major~~, adverse impacts."

65. **Correction**. Change the EA, page 169, Ethnographic Resources and Cultural Practices, Alternative D, Cumulative Impacts, to read: "As described under alternative A, cumulative impacts from all past, present, and reasonably foreseeable actions would be short and long term, *minor to moderate* ~~major~~ and adverse."

66. **Correction**. Change the EA, page 170, Ethnographic Resources and Cultural Practices, Alternative D, Conclusion, to read: "Overall, impacts of alternative D on ethnographic resources, in conjunction with the impacts from other past, present, and reasonably foreseeable future actions would be short and long term, *minor to moderate* ~~major~~, and adverse."

67. **Addition.** Change the EA, page 238, References. Add: "2007. Gier, K. Haleakalā National Park Incident Reports for 2006."

RESPONSES TO COMMENTS

Most of the verbal and written responses to the CSP/EA expressed an opinion or preference; some were substantive. Some comments necessitated minor corrections to the Environmental Assessment.

The following are NPS responses to substantive and non-substantive comments received during the public review of the CSP/EA. A substantive comment is defined by NPS Director's Order 12 (DO-12, section 4.6A) as one that does one or more of the following:

- question, with a reasonable basis, the accuracy of information in the environmental analysis
- question, with a reasonable basis, the adequacy of the environmental analysis
- present reasonable alternatives other than those presented in the environmental analysis
- cause changes or revisions in the proposal

As noted above, there were no substantial modifications required for Alternative B, which has been selected for implementation.

Agency and Kūpuna Comments

Comment: Kīpahulu vehicle sizes should be no bigger than 15 people or 13,500 gross vehicle weight rating (GVW).

> **Response:** As stated in the CSP/EA, the National Park Service considers 25-passenger minibuses to provide a safe and enjoyable visitor experience.

Comment: The number of road-based tours to Kīpahulu should be limited.

Response: The adaptive management process outlined on page 38 of the CSP/EA applies to limits on the number of road-based tours to Kīpahulu and therefore, these numbers could be changed if determined necessary with appropriate environmental compliance.

Comment: The US Fish and Wildlife Service, as well as other commenters, proposed various measures for protection of the endangered petrel, including reducing the number of astronomy tours.

Response: The National Park Service will comply with the terms and conditions on pages 56–57 of the "U.S. Fish and Wildlife Service Biological Opinion and Informal Consultation for the Operation and Management of Haleakalā National Park" regarding the Hawaiian petrel. The adaptive management process outlined on page 38 of the CSP/EA applies to limits on the number of astronomy tours and therefore, these numbers could be changed if determined necessary, with appropriate environmental compliance.

Comment: The CSP/EA understates the impact of commercial services on threatened and endangered species and critical habitat.

Response: The CSP/EA was written before the Biological Opinion was completed that covers operation and management of the park, including commercial services in compliance with section 7 of the Endangered Species Act. The U.S. Fish and Wildlife Service found in the Biological Opinion that the anticipated take of the Hawaiian petrel, Hawaiian goose, or Haleakalā silversword due to operation and management of the park, including commercial activities, is not likely to result in jeopardy to these species. The impact determination under Special Status Species has been modified to moderate for all alternatives in the Errata Sheets to the Environmental Assessment, based on the Biological Opinion.

Comment: The commercial free days should be up to the kūpuna and families with ancestral ties to the land. These days may be different for the Summit and Kīpahulu area.

Response: The National Park Service will consult with the kūpuna and ancestrally tied families regarding when the three–five commercial-free days should occur. The commercial-free days could be different for the summit and Kīpahulu areas.

Comment: The park should not be allowed to venture into business (i.e., no commercial services).

Response: Commercial service providers fill an important role in offering visitors access to high-quality services in order to appreciate park natural and cultural resources. These services may be best provided by a commercial operator, instead of being directly provided by the government. Commercial visitor services that are necessary and/or appropriate for public use and enjoyment may take place in NPS units given certain defined and limited circumstances. Through the CSP/EA, the National Park Service evaluated various guided tour options, and determined that there are necessary and/or appropriate commercial services at Haleakalā National Park. Additional details may be found in the CSP/EA starting on page 43.

Public Comments

Comment: The park should have more than four road-based concessions.

> **Response:** The number of concession contracts for road-based tours proposed in the CSP/EA, up to three in alternatives C and D and up to four in alternative B, was determined by the National Park Service as reasonable in providing effective commercial services, considering visitor needs and resource protection. Under the preferred alternative, the National Park Service would award up to four concession contracts; this number of contracts will promote competition, effectively serve park visitors, and is manageable by the National Park Service. The prospectus for the four contracts can ensure that a variety of different types of services are available to park visitors (such as offered in different languages, different size vehicles, and with different levels of service).

Comment: The sentence on page 53 under "Concept" for alternative A, stating "In this alternative, all commercial tours could continue to grow without limits…", is misleading.

> **Response:** The National Park Service recognizes that the limitations to commercial uses of the park were mischaracterized by the text in the "Concept" section of "Alternative A: No Action." As pointed out by commenters, this text leads readers to believe that commercial use under alternative A would be without limit, when this is not the case. Instead, commercial use authorizations would be limited in alternative A by the park's capacity to handle vehicles and people. Please reference "Text Changes" above to see the changes made to this text.

Comment: Alternatives B and C put too many people out of business.

> **Response:** The concessions contracting process is designed to be competitive, and to encourage operators to provide high-quality services to visitors while protecting park resources. All viable operators will be given the opportunity to compete. As commenters have noted, limits on commercial services may impact those businesses that compete and are not selected for the contracts or authorizations.

Comment: The park should offer separate concession agreements for the summit and Kīpahulu because they are such different areas.

> **Response:** The concessions contracting process allows for flexibility in assigning access to specific geographic locations. These specifications would be made during the prospectus process.

Comment: The park should have more commercial operators to accommodate the niche markets (e.g., Japanese, Korean, Chinese, French, German, Spanish, Portuguese, Italian, high-security, bikes, luxury).

> **Response:** The National Park Service issues prospectuses for concession contracts. Under the 1998 Concessions Management Improvement Act and its regulations, 36 CFR 51, all contracts are issued through competitive selection based on principal and secondary selection factors. Through the concessions contracting process, the park could require commercial operators to provide service to different types of markets. For more information about prospectuses, please visit the following web link: http://www.concessions.nps.gov/prospectuses.htm

Comment: The mix of tours should be market driven.

> **Response:** The concessions contracting process is designed to encourage market-driven commercial services, and can require operators to provide services to more than one type of market. The application and award process is a competitive process. The mix of tours can still be driven by market demand, just with fewer operators within the park.

Comment: Implement a reservation [appointment] system to control the number of people and vehicles in the park at any time when demand is at its peak.

> **Response:** The development of a reservation system is outside of the scope of this CSP/EA. The scope of this plan focuses on commercial use in the park, and does not address broad level visitor use planning issues. This type of suggestion could be addressed in future visitor use planning efforts. For more information about the purpose of the Commercial Services Plan and the goals for the plan, please refer to page 4, "Purpose of the Plan."

Comment: Increase alternative D astronomy group size to 15 people. Please explain the reason behind limiting astronomy tours to 12 people.

> **Response:** Large groups of people apply a disproportionately large impact on an area at one time and disproportionately affect the experiences of others in the area. A group size limit of 12 provides for an adequate tour guide to visitor ratio; a safe, high-quality visitor experience; and an acceptable level of resource impacts. The limit of 12 is consistent with the group size limits previously established in the park's Superintendent's Compendium for all camping, hiking, and horseback uses, as well as all backcountry wilderness area uses. The adaptive management process outlined on page 38 of the CSP/EA also applies to group size limits and therefore, group sizes could be changed if determined necessary, with appropriate environmental compliance.

Comment: Do not limit guided-hike tour size (i.e., more than 12).

> **Response:** Large groups of people apply a disproportionately large impact on an area at one time and disproportionately affect the experiences of others in the area. A group size limit of 12 provides for an adequate tour guide to visitor ratio; a safe, high-quality visitor experience; and an acceptable level of resource impacts. The limit of 12 is consistent with the group size limits previously established in the park's Superintendent's Compendium for all camping, hiking, and horseback uses, as well as all backcountry wilderness area uses. The adaptive management process outlined on page 38 of the CSP/EA also applies to group size limits and therefore, group size limits could be changed if determined necessary, with appropriate environmental compliance.

Comment: Increase astronomy tour trips to two per day.

> **Response:** The number of astronomy tours will not be increased due to the park's obligation to comply with the Endangered Species Act. As noted on page 129 of the draft plan, vehicles driving on the road for astronomy tours have the potential to collide with endangered Hawaiian petrels. As noted on page 42 of the "U. S. Fish and Wildlife

Service Biological Opinion and Informal Consultation for the Operation and Management of Haleakalā National Park," the number of astronomy tours and the number of Hawaiian petrel vehicle strikes per year suggests that vehicles traveling to participate in astronomy tours seem to have an adverse impact on Hawaiian petrels. As noted on page 43 of the Biological Opinion, data suggest that an increased number of astronomy tours may increase Hawaiian petrel vehicle strikes. The National Park Service will comply with the terms and conditions on pages 56–57 of the "U.S. Fish and Wildlife Service Biological Opinion and Informal Consultation for the Operation and Management of Haleakalā National Park" regarding the Hawaiian petrel.

Comment: Permit more than one commercial use authorization for each line of business to promote competition.

Response: All activities in the CSP/EA, except horse tours, have more than one commercial use authorization. However, in order to prevent further impacts on natural resources, the number of horse operations will not be increased. Please also note changes to page 102, Table 13. 2010 CUA Tour Operators, in "Text Changes" above, regarding Maui Horseback Tours.

Comment: Increase commercial-free days to more than five.

Response: The number of commercial-free days (three–five days per year) was selected to strike a balance between the needs of visitors who rely on commercial services to visit the park, commercial service operators who generate revenue by conducting commercial services within the park, and Native Hawaiians who choose to conduct traditional cultural practices without interruptions from commercial tours. Native Hawaiians may enter the park at any time, without charge, for the purpose of performing traditional religious or other cultural activities.

In the plan the National Park Service considered but dismissed the concept of designating two commercial tour-free days per week in the park. This action was intended to provide a range of opportunities for visitors to experience the park, providing two days when visitors who are seeking opportunities for more quiet and solitude could be in the park without encountering commercial tours. This alternative was dismissed because it did not meet the objectives of the plan because a relatively large number of visitors who rely on commercial tours to see the park would not able to come if tours were banned on two days each week.

Comment: Provide a clear process to add new commercial services (e.g., uphill bike tours, eco-tours, photo tours). The requirements outlined in "Potential New Concession Contracts and CUAs" section of the CSP/EA may provide a barrier to new operators.

Response: On pages 50–51 of the CSP/EA, in the "Actions Common to All Action Alternatives" section, the process for adding potential new concession contracts or commercial use authorizations is described, including the application process. This process helps the park determine whether or not the proposed commercial use is both appropriate and necessary within the guidance of National Park Service *Management Policies 2006*, the National Environmental Policy Act, the National Historic Preservation Act, the Endangered Species Act, the 1998 Concessions Management Improvement Act, NPS Director's Order 32: *Cooperating Associations*, and NPS "Commercial Use Authorizations: Interim Guidelines."

Comment: Eco-friendly operators should be given preferences.

> **Response:** By law, concessions regulations specify primary and secondary selection factors used in the evaluation of proposals; two of the factors relate directly to "eco-friendly" operations (Code of Federal Regulations, title 36, sect. 51.17). One of the primary selection factors is "the responsiveness of the proposal to the objectives, as described in the prospectus, of protecting, conserving, and preserving resources of the park area." If the operation is expected to have gross receipts of more than $100,000 annually then the following secondary selection factors are required—"the quality of the offeror's proposal to conduct its operations in a manner that furthers the protection, conservation and preservation of the park area and other resources through environmental management programs and activities, including, without limitation, energy conservation, waste reduction, and recycling." The selection factors are included in the prospectus. The prospectus may also contain park-specific criteria, in addition to the required selection factors. Page 46 of the CSP/EA contains further information on how the park would work with commercial service providers to promote and encourage sustainability.

Comment: Safety data for motor coaches is in dispute. It is unclear if the park analyzed safety data. The safety of motor coaches needs to be analyzed.

> **Response:** The health and safety of visitors, staff, and neighbors are of primary importance to the National Park Service. Park staff are responsible for maintaining conditions that protect the health and safety of employees and the public in the park. The "Public Health and Safety" section in the CSP/EA (page 112) points out that among other causes, cars and buses on the roads contributed to reasons for visitors feeling unsafe in the park (University of Idaho 2000). Additionally, the law enforcement staff of Haleakalā National Park have gathered observations of commercial vehicles that indicate near-miss and collision incidents typically stem from operating full size buses on narrow, windy roads.
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> Because of the relative isolation of the park, and with current and projected future staffing levels, the National Park Service would have difficulty responding to a catastrophic motor coach accident (e.g., a rollover on a steep slope), even with the prompt assistance of partnering local emergency responders. Such an accident could result in a significant number of injuries and/or deaths. To our knowledge, there are no specific safety studies conducted in conditions identical to those at the park. With the data collected on visitors' feelings and the potential for high number of injuries and/or deaths from a motor coach accident, the National Park Service will abide by a precautionary principle and prohibit motor coaches. The National Park Service continues to strive to protect public health and safety and take a hard look at all the causes for concern in the park.

Comment: Several commenters asked for additional information regarding the timeline for implementation and mitigation measures following the completion of the plan, particularly regarding road-based tours, the request that implementation would be staged several years in the future, and the request that implementation should occur more quickly than outlined in the proposed timeline.

Response: Commenters should consult the section titled "Next Steps and Implementation of the Plan" on page 38, which provides a high-level discussion of the next steps for the plan. This section states "many of the actions in this plan can be implemented immediately following the completion of the planning process. However, some actions will be phased in, depending on future National Park Service funding and staff workloads, e.g., requiring all guides to receive training and being certified by the National Park Service staff so as to provide a guidebook to clients." This section also states that "the approval of a plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming." The National Park Service has added additional information to this section in order to provide readers with details regarding implementation. Please reference "Text Changes" above for these details.

Comment: Taxi cabs have not been addressed in the plan.

Response: Non-routine taxi services, which involve no arrangement or advertisement of a park tour and only consist of metered transportation services, are outside the scope of the CSP/EA. Taxi cabs providing a commercial road-based tour service require a commercial use authorization to enter the park (if non-metered and without a specified discharge destination). The park has not received any applications or considered commercial use authorizations with taxi cab companies and therefore, they were not considered in the CSP/EA. A taxi company could compete for a road-based vehicle concessions contract to offer regularly scheduled, advertised service.

Comment: Motor coaches with bathrooms help preserve park water and wastewater resources.

Response: Regarding water and wastewater resources at the park, the National Park Service does not recognize any benefit that one action alternative would offer over another that would warrant conducting additional analysis in the plan. Additionally, it would be infeasible for the National Park Service to enforce the use of only motor coach bathrooms for visitors on motor coach tours. Therefore, the magnitude of any benefit between alternatives is likely to be negligible. The National Park Service has therefore determined that dismissing this impact topic, as described on page 29, is appropriate.

Comment: Motor coaches help protect the air quality of the park by reducing single-passenger vehicles and their associated emissions.

Response: The National Park Service does not recognize any benefit that one action alternative would offer over another that would warrant conducting additional analysis in the plan. Air quality was considered as part of the plan, but dismissed from further analysis on pages 28–29 because none of the alternatives would measurably affect local air quality. Despite dismissing air quality as an impact topic, the National Park Service still has a responsibility under the Clean Air Act to protect its visitors and resources from the adverse effects of air pollution. National Park Service *Management Policies 2006* states that the National Park Service will seek to perpetuate the best possible air quality in parks because of its importance to visitor enjoyment, human health, scenic vistas, and the preservation of natural systems and cultural resources.

Comment: The socio-economic impact analysis did not include discussion regarding the impact on local communities and secondary effects on suppliers to park commercial services providers.

Response: The CSP/EA does analyze the impacts to local communities from the visitor and park operational spending perspective. Analyzing the impacts at this level was determined not be appropriate in this place because it includes a wide range of factors outside of NPS control.

Comment: Reduction in bus sizes should be analyzed as a socioeconomic impact that could result in higher prices paid by visitors.

Response: Pricing of commercial services includes a wide range of factors outside of National Park Service control, such as inflation, economic conditions, and fuel and maintenance pricing, and therefore was not analyzed in this plan. However, the prices charged to visitors by concession contract operators are regulated by the National Park Service, and thus prices will need to be approved by the park.

Comment: Language in the alternatives about horse tour numbers should be expressed as annual usage rather than daily usage.

Response: Horse operations limits will be based on daily use levels and not yearly use levels to prevent concentrated impacts in a short period of time and to prevent further impacts on natural resources.