

the rodenticides), and secondary exposure (species who feed on animals that have been directly exposed). Mitigation measures were incorporated for species at risk of exposure.

Issue 3 (increase in weed abundance): The analysis focused on the potential for each alternative to increase the amount of non-native weeds on Lehua. Removing rabbits and the resultant reduction in herbivory could lead to weed release. Each alternative discusses compliance with policies and programs currently in place under USFWS and DOFAW as well as the establishment of monitoring and weed control programs, as necessary, for the benefit of the native ecosystems.

Issue 4 (impacts on cultural resources): Each alternative was examined for potential disturbance to archeological sites that could be caused by people conducting project activities. Disturbance of sensitive archeological sites or artifacts could be avoided by educating all project staff of locations, appearance, the fragile nature of such sites and artifacts, and how to properly conduct themselves. Hunters would be trained to avoid shooting at any platforms or archeological sites.

Issue 5 (impacts on human health and safety): Each alternative was evaluated for risks to humans on Lehua Island. No landing is allowed on Lehua unless permitted by the USCG. However, the public has access to the waters surrounding Lehua on private, fishing, dive, and tourist vessels. Therefore, potential risks for public exposure to toxicants in intertidal and marine food species were evaluated, as well as the risk to employees carrying out restoration actions from handling rodent bait and firearms.

Issue 6 (introduction of non-native species): Each alternative was evaluated for its inherent risks of introducing non-native species, caused by moving people, animals, and equipment and supplies onto Lehua. Non-natives could include weeds, insects, rodents and other vertebrates, and possibly pathogens. Integral to the proposed actions are a contingency plan for response to the rediscovery or reintroduction of non-native species after eradication, and a plan to avoid alien species introductions during and after the project.

## STATE CRITERIA FOR PROJECT SIGNIFICANCE

### State of Hawai'i Environmental Council's Criteria for Significance

The State of Hawai'i Environmental Council gives 13 criteria (in italics below) for defining significant project impacts (Hawai'i Administrative Rules, Section 11-200-12). These criteria are summarized in the Hawai'i Health Department's Office of Environmental Quality Control (OEQC) guidebook. As discussed below, this project does not trigger any of the criteria for significance and thus, under State law, does not require preparation of an environmental impact statement (EIS). A Finding of No Significant Impact (FONSI) document prepared by the USFWS provides the rationale, from the perspective of Federal guidelines and regulations, for justifying the decision not to prepare an EIS. Federal and State criteria for significance are similar but not identical.

**The proposed actions do not involve an irrevocable commitment to loss or destruction of any natural or cultural resource.** The action proposed in this EA will not result in loss or destruction of any natural or cultural resources. Rather, this action will result in the restoration of a healthy native ecosystem on Lehua.

**The proposed actions will not curtail the range of beneficial uses of the environment.** The activities proposed are intended to restore the island and improve its habitat for the native plants, nesting seabirds, and marine mammals that inhabit or historically inhabited the island, prior to its degradation by invasive rats and rabbits. Restoration of Lehua will thus improve the range of beneficial uses of the environment.

**The proposed actions will not conflict with the State's long-term environmental policies.** The proposed actions will not conflict with the environmental policies set forth in Chapter 344, HRS, and other statutes and regulations, since the proposed actions will not damage sensitive natural resources nor emit excessive noise or contaminants. Instead, they will improve Lehua's environment.

**The proposed actions will not substantially adversely affect the economic and social welfare of the community.** The proposed activities utilize the most effective strategies to remove invasive rats and rabbits, thus restoring Lehua's ecosystem. Restoring Lehua will result in a better, more aesthetically pleasing environment, thus supporting eco-tourism and enhancing social economic and social welfare.

**The proposed actions will not substantially adversely affect the public health of the community.** The proposed actions will not emit excessive noise or contaminants and will not have substantial adverse effects on public health. Lehua is uninhabited and overnight camping is prohibited. Visitation is only occasional and the project is not anticipated to affect the health of these visitors.

**The proposed actions will not involve substantial secondary impacts, such as population changes or effects on public facilities.** Lehua is approximately 19 miles offshore from Kaua'i and is uninhabited. The project does not propose construction of public facilities or involve establishing a human population on Lehua. Thus, the proposed actions will not affect any public recreational facilities and will not induce population growth or decline in the area.

**The proposed actions will not involve a substantial degradation of environmental quality.** Utilizing best management practices will minimize impacts to the environment during the implementation of the proposed actions. Restoration will increase the environmental quality of Lehua's ecosystem for its biota and user groups alike.

**The proposed actions will not affect a rare, threatened, or endangered species or its habitat.** The proposed actions will have a net benefit for rare, threatened and endangered birds and plants. With basic mitigation outlined in the EA, the human presence associated with the proposed action will have a negligible impact on listed species.

**The proposed actions will not have cumulative impacts or involve a commitment for larger actions.** The proposed actions will not have negative cumulative impact or involve significant commitment for larger actions than those delineated. The cumulative impact will, in fact, be beneficial. Natural ecological processes will be restored, resulting in a positive change in Lehua's ecosystem.

**The proposed actions will not substantially affect air or water quality or ambient noise levels.** Because of the limited scale of the project, and use of good management practices, there will be no substantial effect on air or water quality or ambient noise levels.

**The proposed project is not located in an environmentally sensitive area (e.g. flood plain, tsunami zone, and coastal zone).** Although the site is located in a Conservation District, the proposed actions are in accordance with the zoning of the area as preservation lands and implement management actions to restore and enhance native habitats. Project actions are in accord with environmental management goals of USFWS, DOFAW and the USCG.

**The proposed actions will not substantially affect scenic vistas and view planes identified or State plans or studies.** The project does not involve construction of any permanent structures or alteration of landscapes. Thus, it will not affect any sites or vistas.

**The proposed project will not require substantial energy consumption.** The affected area is not on a local power grid. With sources being battery, solar, or generator power, energy consumption will be minimal and periodic. There will be no need for long-term energy sources to carry out the proposed actions.