APPENDIX C-4
Applicant response letter dated April 27, 2011

CHRIS HART
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Landscape Architecture
City & Regional Planning

April 27, 2011

Loyal Mehrhoff, Field Supervisor
Pacific Islands Fish and Wildlife Office
Fish and Wildlife Service
US Department of the Interior
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850

Subject: Technical Assistance for the Environmental Impact Statement Preparation Notice for the Proposed Maui Research and Technology Park Master Plan Update, Maui

Dear Dr. Mehrhoff,

I am responding to your letter dated 28 October 2010 (2010-TA-0527) regarding Maui R&T Partners, LLCplans to update the Master Plan for the Maui Research and Technology Park (MRTP) in Kīhei, Maui (Appendix A). Based on the concerns you expressed, we tasked SWCA Environmental Consultants to conduct additional botanical and wildlife reconnaissance surveys of the properties on February 23 and March 31, 2011.

Two of the 12 plant species identified on the property by Robert Hobdy in October 2008 are indigenous to Hawaii ('ilima and 'uhaloa). Hobdy noted that 'ilima was rarely observed on the property, and 'uhaloa was uncommon there. Both Hobdy and SWCA found the area to be dominated by non-native kiawe and buffelgrass. SWCA found an additional nine plant species not previously reported by Hobdy, all of which were non-native (Appendix B). *Ipomoea obscura,* a possible host plant for adult *Manduca blackburni,* was found to be rare; however, no species confirmed as larval host plants for *M. blackburni* were found within the MRTP properties. No additional species of wildlife other than those reported by Hobdy were observed by SWCA within the properties in

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February and March 2011. No listed or candidate endangered species of plants or animals were observed within the property.

None of the species listed in Table 1 of your 28 October 2010 letter were found within the MRTP properties. The easternmost boundaries of the MRTP property lay roughly two linear miles downslope from the westernmost edge of the final boundary for the Pu□u O Kali Critical Habitat Unit for *Manduca blackburni* (as identified in 68 FR 111 34710-34766, June 10, 2003) and the Pu□u O Kali Preserve. The vacant lands separating the two areas are privately owned and dominated by buffelgrass and kiawe. In response to your concerns, Maui R&T Partners, LLC intends to incorporate the following measures into the project EIS to minimize potential impacts.

Avoid Direct Impacts to Hawaiian Hoary Bats

To minimize the potential impacts to the Hawaiian hoary bat, woody plants greater than 15 feet tall will not be removed or trimmed between July 1 and August 15 throughout the development and ongoing operation of the proposed project. These dates are fully consistent with the restrictions recommended to prevent harm to non-volant juvenile bats (F. Bonnacorso, USGS, letter to D. Greenlee, USFWS), and have been endorsed by the Fish and Wildlife Service during clearing of non-native vegetation for the Kahuku Wind Power project and other construction projects.

Minimize Light Impacts to Seabirds

Outdoor lighting will be minimized to the extent practicable to help avoid creating an attractive nuisance to Newell's shearwaters and Hawaiian petrels that might transit over the property at night. Outdoor lights will be shielded in accordance with the guidelines for light fixtures provided with your 28 October 2010 letter.

Minimize Attraction and Impacts to Listed Birds

Expansion of the MRTP will not involve the creation of golf course(s) or open water features. Tenants will be expected to comply with Maui County leash laws. Maui R&T Partners, LLC will institute a pest control program administered by groundskeepers aimed primarily at rodent and feral animal control.

Avoid or Address Impacts to the Blackburn's Sphinx Moth

No known larval host plants for the Blackburn's sphinx moth have been observed within the MRTP properties. A single species of non-native morning glory, *Ipomoea obscura,* was found to be rare on the property. The Fish and Wildlife Service (FWS) states that all species of *Ipomoea* may be host plants for adult Blackburn's sphinx moths (68 FR 111 34710-34766, June 10, 2003). However, given the rarity of *Ipomoea* here and the absence of larval host plants, we conclude that Blackburn's sphinx moths and their habitats will not be impacted by the MRTP.

Survey for Yellow-Faced Bees and Protected Plant Species

Biologists from SWCA Environmental Consultants surveyed the MRTP properties again in February and March 2011, and found no listed or candidate endangered plants species. Dr. Karl Magnacca has indicated that these rare bees are so far only known from areas *dominated* by native plant communities (K. Magnacca, University of Hawaii at Hilo, personal communication). Since the MRTP is dominated by non-native grasses and scrub vegetation and 'ilima is uncommon here, it is highly unlikely that the MRTP properties are habitat for Hawaiian yellow-faced bees.

Minimize Wildlife Impacts

During project construction, measures will be taken to maintain a sufficient fire break along the boundaries of the proposed MRTP expansion. When completed, the MRTP will completely remove all non-native grass, weed, and scrub fuels from an area of approximately 432 acres. Undeveloped lands immediately adjacent to the northern, and eastern and southern boundaries of the MRTP are owned by Kaonoulu Ranch and Haleakala Ranch, respectively. These lands serve as a defacto fire break for MRTP because they are currently zoned Ag and are actively grazed by cattle. Grazing plays a key role in minimizing fuel loads on privately owned lands outside the project footprint. The MRTP is currently serviced by the Kihei Fire Station which is located approximately 1.5 miles from the MRTP. Additional fire control support is also available from Windward Helicopters and Pacific Helicopters at the Kahului Airport; however, response times can vary greatly. The completed MRTP will have fire hydrants and water pressures as required by law to service the area.

Minimize the Spread of Invasive Species

During land clearing and construction associated with expansion of the MRTP, care will be taken to prevent the invasion of disturbed areas by noxious invasive weed species, non-native tree tobacco, and other potential non-native host plants of the Blackburn's sphinx moth. However, to minimize the potential for introducing new invasive plants to the project area, Maui R&T Partners, LLC would ensure that off-site sources of revegetation materials (seed mixes, gravel, mulches, etc.) are certified weed-free. All areas that are hydroseeded would be monitored for six months after hydroseeding to ensure removal of any invasive plants that have established from seeds inadvertently introduced as part of the seed mixes. Building supplies imported to Maui for construction will be regularly inspected at Kahului Harbor for presence of alien species. We will employ a palette of suitable native plant species which are known to occur within the natural dry scrubland habitats native to the Kīhei area for landscaping. To the extent practicable, we will utilize seeds of native species previously harvested from the Kīhei environs and available from local nurseries and related sources. Specific species suitable for use can include, but may not be limited to, koai'a (*Acacia koaia*), native wiliwili (*Erythrina sandwicensis*), kolomana (*Senna gaudichaudii*), and kou (*Cordia subcordata*). Other native plants, such as 'a'ali'i (*Dodonea viscosa*), 'āhinahina (*Achyranthes splendens var. rotunda*), 'āwikiwiki (*Canavalia pubescens*), kulu'i (*Nototrichium sandwicense*), maiapilo (*Capparis sandwichiana*), naio (*Myoporum sandwicense*), 'ōhai (*Sesbania tomentosa*), pili (*Heteropogon contortus*), and ti leaf (*Cordyline fruticosa*) and other plant species identified in the Maui County Planting Plan can be used throughout the site to the extent possible.

Thank you for expressing the concern of your agency regarding the proposed Maui Research and Technology Park. Please don't hesitate to contact me should you have any questions regarding our response.

Sincerely yours,

Michael J. Summers

Michael J. Summers
Senior Associate
Chris Hart & Partners, Inc.

cc: Scott Fretz, Hawaii DLNR (DOFAW)
Steve Perkins, Pacific Rim Land