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| <b>REQUEST FOR ENVIRONMENTAL IMPACT ANALYSIS</b>   |  | <i>Report Control Symbol (RCS):</i><br>[RCS Needed]   |
| INSTRUCTIONS: <i>Section I to be completed by Proponent; Sections II and III to be completed by Environmental Planning Function. Continue on separate sheets as necessary. Reference appropriate item number(s).</i>   |  |   |
| <b>SECTION I - PROPONENT INFORMATION</b>   |  |   |
| 1. TO ( <i>Environmental Planning Function</i> )<br>21 CES/CEIE  | 2. FROM ( <i>Proponent organization and functional address symbol</i> )<br>Air Force - 15 SPSS/MAF | 2a. TELEPHONE NO.<br>808-891-7772   |
| 3. TITLE OF PROPOSED ACTION<br>Maui REPI Deer Fencing  |  |   |
| 4. PURPOSE AND NEED FOR ACTION ( <i>Identify decision to be made and need date</i> )   |  |   |
| <p><b>1. State the purpose of this action.</b><br/>The purpose of this action is to decrease flooding, erosion, and safety hazards at Maui SFS from the destructive overpopulation of the Axis Deer species.</p> <p><b>2. State the need for this action.</b><br/>With no natural predators, the Axis Deer population at Maui, HI has drastically expanded, leading to nine governor's emergency proclamation from 2021 - 2023 (FY24 Maui County REPI Full Proposal, pg. 2). Axis deer lower climate resilience, destroying habitats, including the montane mesic, alpine, subalpine, dry cliff, lowland dry, wetland, coastal, and near-shore habitats (FY24 REPI Proposal, pg. 4), destabilizing slopes, impairing water recharge and reducing food production. Apical stems and top flush of plants are chewed away, tree development is stunted through antler polishing, and the sheer number of deer has eroded much of the vegetation and compacting soil, decreasing soil permeability and increasing erosion (FY24 REPI Proposal, pg. 5). Deer droppings has increased the presence of parasite species leptospirosis, cryptosporidiosis, and escherichia coli, and caused \$400,000 in farm and ranch damage in 2020 alone (FY24 REPI proposal, pg. 6).</p> <p><b>3. What do you intend to accomplish and why is the action necessary?</b><br/>Install deer fencing on the leeward side of Haleakala to restrict the movement of the wild invasive deer population on Maui. Controlling the deer population will reduce the damage caused to native plant populations and decrease both flooding and wildfire risks.</p> <p><b>4. Is the action identified in existing environmental management plans? If so please identify which one (e.g. INRMP, ICRMP, Wildland Fire, Other) and the status of that plan.</b><br/>This project is being accomplish by County of Maui with funding from OSD through the REPI program. The work is being done on county and private land.</p> <p><b>5. What is currently being done to meet the need?</b><br/>Deer fencing has been installed in other areas of Maui. this is the next phase of this fencing plan.</p> <p><b>6. Provide any additional details related to the Purpose and Need for Action.</b><br/><br/><b>Need Date:</b> 07/01/2024</p> |  |   |
| 5. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES (DOPAA) ( <i>Provide sufficient details for evaluation of the total action.</i> )   |  |   |
| <p><b>1. Describe the proposed action.</b><br/>Proposed action will install deer fencing on the leeward side of Haleakala to restrict the movement of the wild invasive deer population on Maui (see attached Maui REPI Deer Fence Map, Priorities 1-3).</p> <p><b>2. Describe alternatives to the proposed action.</b><br/>USSF has not considered other alternatives. Maui County may have considered other options prior to submitting the proposal, including no action.</p> <p><b>3. What alternatives were eliminated from consideration and why?</b><br/>USSF has not considered other alternatives. Maui County may have considered other options prior to submitting the proposal. No action does not address the increasing flooding and safety hazards from the axis deer population and native plant loss.</p> <p><b>4. Describe what will happen if no action is taken.</b><br/>The risk for flooding and wildfires threatening Maui SFS would remain high, with increased potential for impacts to training, operations, and safety.</p> <p><b>5. Please provide a description of the environmental management action and timing when it will occur.</b><br/>Install 36,620 linear feet of deer fencing on the leeward side of Haleakala east of Kihei (see attached Maui REPI Deer Fence Map, Priorities 1-3).</p> <p><b>6. Describe the project location. Attach map(s)/diagram(s) – make sure to include an overview map of where your requested project area is on the installation.</b><br/>This project is being accomplish by County of Maui with funding from OSD through the REPI program. The work is being done on county and private land.</p> <p><b>7. What external coordination has occurred with environmental management stakeholders and what coordination remains before the action can be implemented?</b><br/>None. Unware of what coordination is needed.</p> <p><b>8. Provide any additional details related to the Description of the Proposed Action and Alternatives (e.g., outline mitigation measures and other issues).</b></p> <p><b>Map Attachments:</b><br/><a href="#">Maui REPI Deer Fence.pdf</a></p>   |  |   |
| 6. PROPONENT APPROVAL ( <i>Name and Grade</i> )<br>Eady Kevin DOD - kevin.t.eady1  | 6a. SIGNATURE<br>//Eady Kevin DOD - kevin.t.eady1 i:0e.t fedvis kevin.t.eady1//                    | 6b. DATE<br>04/09/2024  |
| <b>SECTION II - PRELIMINARY ENVIRONMENTAL SURVEY</b> ( <i>Check appropriate box and describe potential environmental effects including cumulative effects.</i> ) (+ = positive effect; 0 = no effect; - = adverse effect; U = unknown effect)  |  | <div style="display: flex; justify-content: space-around; align-items: center;"> <span>+</span> <span>0</span> <span>-</span> <span>U</span> </div> |

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| 7. AIR INSTALLATION COMPATIBLE LAND USE/ZONE USE (Noise, accident potential, encroachment, etc.)  |  | X                       |
| 8. AIR QUALITY (Emissions, Attainment status, state implementation plan, etc.)  |  | X                       |
| 9. WATER RESOURCES (Drinking water, wastewater, quality, quantity, source, water features, etc.)  |  | X                       |
| 10. SAFETY AND OCCUPATIONAL HEALTH (Asbestos/lead-based paint/radiation/chemical exposure, explosives safety quantity distance, bird/wildlife aircraft hazard, etc.)  |  | X                       |
| 11. HAZARDOUS MATERIALS/WASTE (Use/storage/generation, solid waste, toxic materials, etc.)  |  | X                       |
| 12. BIOLOGICAL RESOURCES (Wetlands/floodplains, threatened or endangered species, etc.)   |  | X                       |
| 13. CULTURAL RESOURCES (Burial sites, archaeological, historical, etc.)   |  | X                       |
| 14. GEOLOGY AND SOILS (Topography, minerals, geothermal, Installation Restoration Program, seismicity, etc.)  |  | X                       |
| 15. SOCIOECONOMIC (Employment/population projections, school and local fiscal impacts, etc.)  |  | X                       |
| 16. OTHER (Potential impacts not addressed above, such as Host Nation considerations/concerns for non-US locations.)  |  | X                       |
| SECTION III - ENVIRONMENTAL ANALYSIS DETERMINATION  |  |                         |
| 17. <input checked="" type="radio"/> PROPOSED ACTION QUALIFIES FOR CATEGORICAL EXCLUSION (CATEX) #DON-(f)(45) ; OR<br><input type="radio"/> PROPOSED ACTION DOES NOT QUALIFY FOR A CATEX; FURTHER ENVIRONMENTAL ANALYSIS IS REQUIRED.   |  |                         |
| 18. REMARKS<br>The proposed action qualifies for applications CATEX DON-(f)(45) because it involves land zones for agricultural use owned by the State of Hawaii. Project is natural resource management of the invasive Axis deer species control through the FY2024 REPI Maui Mauka-to-Makai Stewardship Project. Maui County Office of Economic Development is managing responsibility and authority over the project for invasive species actions established for State fish and game management laws. The proposed action does not fall within MSSC, however, it is still consistent with the INRMP established property management goals and procedures. The DAF extraordinary circumstances pursuant to appendix B to 32 CFR part 989—Categorical Exclusions, § A2.2. Additional Analysis has been reviewed and no circumstances have arisen in A2.2.1 thru A2.2.8. CATEX DON-(f)(45) is still available and part of the owning agency's regulation and the DON extraordinary circumstances pursuant to appendix B to 32 CFR part 775.6—Planning Considerations, § (e) Categorical Exclusions has been reviewed and no circumstances have arisen in 1(i) thru 1(v)(E). Proposed action improves overall human and environment health with well established methods adhering to all applicable laws, and site visits were conducted to confirm no adverse effect on wilderness areas, endangered species, wetlands, or historical lands. Proposed action does not use uncontrolled/unpermitted hazardous substances and provides an overall positive effect on human safety, native vegetation growth, and natural disaster aversion.<br>The DAF is aware of the November 12, 2024 decision in Marin Audubon Society v. Federal Aviation Administration, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality (CEQ) regulations implementing NEPA are not judicially enforceable or binding on this agency action, the DAF has nonetheless elected to follow those regulations at 40 C.F.R. Parts 1500– 1508, in addition to the DAF's procedures/regulations implementing NEPA at 32 CFR 989, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 et seq. |  |                         |
| 19. ENVIRONMENTAL PLANNING FUNCTION CERTIFICATION (Name and Grade)<br>Tomlinson, Robert GS-13   | 19a. SIGNATURE<br>//Tomlinson Robert DOD - robert.r.tomlinson i:0e.t fedvis robert.r.tomlinson// | 19b. DATE<br>06/05/2025 |

**CONTINUATION SHEET****Review Comments:****Safety and Occupational Health** (04/11/2024 - Mcdevitt Jacob DOD - jacob.m.mcdevitt)

Comply with all OSHA and consensus standards while installing the fences. Submit dig permits for applicable areas where fence posts will be driven.

**Bioenvironmental** (04/12/2024 - Puleo Michael DOD - michael.j.puleo)

Per AFI 48-154, Occupational and Environmental Health Program and AFTTP 3-2.82, Occupational and Environmental Health Site Assessment, the activities for this proposed action are categorized as/similar to/identical to current operations at this installation. No significant occupational or environmental health concerns to mission personnel are noted, and 21 CES will ensure compliance with all applicable requirements.

**Water Resources** (05/28/2024 - Wooten David DOD CIV - david.f.wooten1)

1. Will a new or modified National Pollutant Discharge Elimination System (NPDES), or HN equivalent, permit be required? - No new NPDES Permit will be required.
  2. Would the Project require permitting to discharge effluents into an existing body of water? - Due to effected land not on governmental owned property, any permitting will be established through local jurisdictional agencies and coordinated through HDOH, etc.
  3. Would the Project impact any existing body of water, floodplain or jurisdictional wetland? - No impact expected, however due to effected land not on governmental owned property, any impact will be assessed through local jurisdictional agencies and coordinated through HDOH, etc.
  4. Are there downstream sedimentation or storm water-born pollution issues that may be impacted by implementing the Project? - No impact expected, however due to effected land not on governmental owned property, any impact will be assessed through local jurisdictional agencies and coordinated through HDOH, etc.
  5. Will the Project comply with the installation's Storm Water Pollution Prevention Plan or require a modification? - Due to effected land not on governmental owned property, any compliance to applicable SWPPP will be evaluated through local jurisdictional agencies and coordinated through HDOH, etc.
  6. Does the installation drain to an impaired water body and would the Project have the potential to create excessive runoff, sedimentation, and/or erosion as a result of implementing the Project? - Due to effected land not on governmental owned property, any impact on impaired water bodies will be evaluated through local jurisdictional agencies and coordinated through HDOH, etc. However, expecting no issues if excessive sedimentation and runoff can be controlled through the proper implementation of control measures/BMPs.
  7. Would the Project have the potential to adversely affect/require mods or substantial changes to installation or community groundwater, wastewater, storm water or other natural or manmade water systems to accommodate regulated wastewater pollutants? - Due to effected land not on governmental owned property, any impact on impaired water bodies will be evaluated through local jurisdictional agencies and coordinated through HDOH, etc. However, no substantial adverse effects to Stormwater anticipated and no substantial changes to wastewater or groundwater.
  8. Does the installation lack sustainable and adequate potable and process water supplies to support the Project? - Due to effected land not on governmental owned property, any required potable or process water supply needed will be evaluated and supplied through local jurisdictional agencies and coordinated through HDOH, etc.
- ☐ Overall, this 813 project is not expected to have a negative impact to water quality requirements or compliance or risk to DoD Gov't owned property. Since the effected land is not on governmental owned property, any potential impact will be evaluated through local jurisdictional agencies and coordinated through HDOH, etc.

**Tanks** (05/28/2024 - Wooten David DOD CIV - david.f.wooten1)

Due to the effected land area not on governmental owned property, any impact or compliance concerns will be assessed/addressed through local jurisdictional agencies and coordinated through HDOH, etc.

1. Will the Project require a new and/or replacement of a tank(s)? - No.
  2. Will the Project require the relocation of a tank(s)? - No.
- ☐ Overall, no impact to or addition of tanks is expected.

**Other** (05/28/2024 - Wooten David DOD CIV - david.f.wooten1)

Due to the effected land area not on governmental owned property, any impact or compliance concerns will be assessed/addressed through local jurisdictional agencies and coordinated through HDOH, etc.

1. Hazardous waste, hazardous materials or oil and fuel spills? - None expected.
2. Adding or removing tanks? - Not applicable.
3. Bringing hazardous materials onto the installation? - None expected.
4. Removing hazardous or toxic waste from the installation? - None expected.
5. Adding or removing generators or real property installed engine? - Not applicable.
6. Inadvertent discoveries of human remains or historic artifacts? - None expected.

**Hazardous Materials/Waste** (05/28/2024 - Wooten David DOD CIV - david.f.wooten1)

Due to the effected land area not on governmental owned property, any impact or compliance concerns will be assessed/addressed through local jurisdictional agencies and coordinated through HDOH, etc.

1. Would the Project require the use of new or different hazardous or toxic substances that may come in contact with the surrounding environment? - None expected.
  2. Would mission personnel be required to use hazardous or toxic materials to implement the Project? - None expected.
  3. If renovation is to occur, has the building been surveyed for asbestos-containing material (ACM)? - Not applicable.
  4. Does the Project have the potential to generate hazardous materials and/or waste? - None expected.
  5. Would the Project require issuance of new or modified solid waste and/or hazardous waste related permit? - No.
  6. If renovation is to occur, lead base paint (LBP) may be present. - None expected.
  7. Does the Project require hazardous waste to be collected and stored on the property? - None expected.
  8. Does the Project increase potential risks for explosion, spill or the release of hazardous materials or waste? - No.
- Any wastes characterized as Universal (lamps, batteries, etc.) or Hazardous waste must be properly disposed of by the contractor IAW all federal & state regulations. - Follow local/state jurisdictional requirements.
- Overall, no impact from HazWaste or HazMat is expected for installation of deer fencing.

**Air Quality** (05/28/2024 - Wooten David DOD CIV - david.f.wooten1)

Due to the effected land area not on governmental owned property, any impact or compliance concerns will be assessed/addressed through local jurisdictional agencies and coordinated through HDOH, etc.

1. Will the Project create criteria pollutant and/or hazardous air pollutant emissions during construction and or operations? - None expected.
2. Will implementation of the Project require the issuance of a new or modified air permit? - No new or modified air permit is required.
3. Has the Project been analyzed in Air Conformity Applicability Model (ACAM)? Attach the ACAM report. - Not required.

4. Will the Project include source(s) that may be classified as a New Source or a major modification of an existing source? - No new sources.
5. Will mitigation, emissions control devices and/or other management practices be required to minimize or eliminate effects to the region's air quality condition with regard to attainment of National Ambient Air Quality Standards (NAAQS)? - No negative effects to region's air quality.
- ☐ Overall, no impact to Air Quality is expected for installation of deer fencing.

**Natural Resources** (09/03/2024 - Kelley David DOD - david.j.kelley)

1. Would the Project potentially impact caves, faults, geothermal vents, mineral resources or any other geologic feature?
- There are none of the above reference geologic features located within the project area.

**Biological Resources** (09/03/2024 - Kelley David DOD - david.j.kelley)

1. Would the Project impact any plants or animals that are listed or candidates for threatened, unique, rare or endangered status?
2. Will there be any impacts from the construction of the Project on any types of critical, sensitive or unique habitats to include floodplains, wetlands, vernal pools, etc.?
3. Would there be any potential impacts to Threatened or Endangered species (TES) from implementing the Project's construction, operation and/or maintenance activities?
4. Are there any surveyed federal- or state-listed TES within the Project's region of influence?

Although the broader proposed action area contains numerous species, habitats and wetlands. The specific location and activities identified in the scope of work will have no effect on specific biological resource referenced above. A site visit conducted on 20 August 2024 to verify the site conditions and work area. Informal consultation (verbal) was performed with Fish and Wildlife Service (Rayn Pe'a), confirmed no need for formal consultation and concurred with determination of no effect.

**Cultural Resources** (02/20/2025 - Lawton William DOD - william.c.lawton)

Consultation with SHPO and NHOs initiated per Section 106 on 13 December 2024. 30 day response window passed with no contact from any consulting party. DAF proposed a finding of No Adverse Effect to Historic Properties. CRM recommends that CATEX applied and project proceed; in the event that consulting parties do respond at some later date, their responses will be retained for the administrative record, and as appropriate CRM may recommend changes to scope, work plan, etc.

**Legal** (06/05/2025 - Haynes Valerie DOD - valerie.v.haynes)

Legal review finding legal sufficiency of CATEX DON (f)(45) sent to 21CES this date. VVH

**Attachments:**

[FINAL JA SIGNED Legal Rev re 813 for Deer Fencing REPI Project around MSSC.5 jun 2025.pdf](#)  
[FY24 Maui County Full Proposal.pdf](#)