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GOVERNOR OF HAWAII



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**

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September 2, 2022

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HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

Ms. Mary Alice Evans, Director  
State of Hawai'i  
Office of Planning and Sustainable Development  
Environmental Review Program  
235 South Beretania Street, Room 702  
Honolulu, HI 96813

RE: FINAL ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT  
IMPACT FOR THE PROPOSED FIELD RELEASE OF *EUSELASIA CHRYSIPPE*  
(LEPIDOPTERA: RIODINIDAE) FOR BIOLOGICAL CONTROL OF MICONIA,  
*MICONIA CALVESCENS* (MELASTOMATACEAE), IN HAWAI'I

Dear Ms. Evans:

With this letter, the State of Hawai'i Department of Land and Natural Resources hereby transmits the Final Environmental Assessment and Finding of No Significant Impact (FEA-FONSI) for the proposed field release of *Euselasia chrysippe* (Lepidoptera: Riodinidae) for biological control of miconia, *Miconia calvescens* (Melastomataceae), in Hawai'i for publication in the next available edition of The Environmental Notice.

In addition to this letter, the online Environmental Review Program (ERP) Publication Form has been submitted through the ERP website, including one (1) electronic copy of the FEA-FONSI as an Adobe Acrobat PDF file.

Should you have any questions, please contact Robert Hauff of the Division of Forestry and Wildlife at (808) 587-4174.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne D. Case".

7

Suzanne D. Case  
Chairperson

**From:** [webmaster@hawaii.gov](mailto:webmaster@hawaii.gov)  
**To:** [DBEDT OPSD Environmental Review Program](#)  
**Subject:** New online submission for The Environmental Notice  
**Date:** Wednesday, September 14, 2022 4:23:04 PM

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**Action Name**

Field Release of Euselasia Chrysippe for Biological Control of Miconia (Miconia calvescens) in Hawaii

**Type of Document/Determination**

Final environmental assessment and finding of no significant impact (FEA-FONSI)

**HRS §343-5(a) Trigger(s)**

- (1) Propose the use of state or county lands or the use of state or county funds
- (2) Propose any use within any land classified as a conservation district

**Judicial district**

Statewide

**Tax Map Key(s) (TMK(s))**

(9)9-9-999:999

**Action type**

Agency

**Proposing/determining agency**

Department of Land and Natural Resources

**Agency contact name**

Andy Cullison

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Honolulu, Hawaii 96813  
United States  
[Map It](#)

**Was this submittal prepared by a consultant?**

No

**Action summary**

The Hawai'i Department of Land and Natural Resources propose the field release on State lands in Hawai'i of a

butterfly with gregarious larvae, *Euselasia chrysippe* for biological control of miconia, *Miconia calvescens*.

Miconia is a Hawai'i State noxious weed native to Central and South America. In Hawai'i, large infestations exist on the islands of Hawai'i and Maui, and populations can also be found on Kaua'i and O'ahu. Miconia is shade-tolerant, establishing in the understory of other species in mesic to wet forests. It shades and outcompetes other species, effectively forming a monoculture.

*E. chrysippe* is a natural herbivore of miconia in the plant's native range in Costa Rica. *E. chrysippe* was found to be the most promising leaf-feeding biocontrol for miconia. Extensive testing has shown it to be host-specific to miconia and other closely related members of the melastome family, all of which are non-native weeds in Hawaii.

#### **Reasons supporting determination**

Because *E. chrysippe* is limited to feeding on a small pool of closely related species, all of which are invasive weed species, its release is expected to be beneficial to Hawai'i's forests and hydrology, and adverse effects are expected to be negligible. Further, there are no significant cultural or agricultural uses for miconia, and all comments received during the draft environmental assessment were in support of the project. Therefore, the determination from this Final Environmental Assessment is a Finding of No Significant Impact (FONSI).

#### **Attached documents (signed agency letter & EA/EIS)**

- [FEA-FONSI-Euselasia-Chrysippe-Miconia-Biocontrol-083022.pdf](#)
- [FONSI-letter-Euselasia-9.2.2231-signed.pdf](#)

#### **Shapefile**

- The location map for this Final EA is the same as the location map for the associated Draft EA.

#### **Action location map**

- [FEA-Shapefile1.zip](#)

#### **Authorized individual**

Andy Cullison

#### **Authorization**

- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

**Final Environmental Assessment**

**Field Release of *Euselasia chrysippe***  
**(Lepidoptera: Riodinidae) for Biological Control of**  
**Miconia, *Miconia calvenscens* (Melastomataceae), in**  
**Hawai‘i**

Prepared For:

Department of Land and Natural Resources  
Division of Forestry and Wildlife  
1151 Punchbowl St., Room 325  
Honolulu, Hawai‘i 96813



Prepared By:

SWCA Environmental Consultants

**SWCA**<sup>®</sup>  
ENVIRONMENTAL CONSULTANTS  
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August 2022

This Final Environmental Assessment (FEA) and Finding of No Significant Impact (FONSI) was prepared by the DLNR Division of Forestry and Wildlife and submitted to the Environmental Review Program, State of Hawaii Office of Planning and Sustainable Development, to comply with the provisions of Hawaii Revised Statutes, Chapter 343, Environmental Impact Statements. Appendix C of this FEA contains public comment in the form of twenty-three letters of correspondence, all of which were supportive of the field release of *Euselasia chrysippe*. As a result, this FEA is unchanged from the draft EA.

## PROJECT SUMMARY

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**Project Name:** Field Release of *Euselasia chrysippe* (Lepidoptera: Riodinidae) for Biological Control of *Miconia*, *Miconia calvescens* (Melastomataceae), in Hawai‘i

**Proposing Agency:** Department of Land and Natural Resources, Division of Forestry and Wildlife  
State of Hawai‘i

**Project Location:** Statewide

**Property Owner:** State of Hawai‘i

**State Land Use Classification:** Not Applicable

**Agency Determination:** Finding of No Significant Impact (FONSI)

### Agencies, Organizations, and Other Stakeholders Consulted:

#### FEDERAL AGENCIES

- U.S. House of Representatives, Representative Tulsi Gabbard
- U.S. House of Representatives, Representative Colleen Hanabusa
- U.S. Senate, Senator Mazie Hirono
- U.S. Senate, Senator Brian Schatz
- National Park Service, Hawai‘i Volcanoes National Park
- National Park Service, Haleakalā National Park
- Natural Resources Conservation Service, Pacific Islands Area
- U.S. Army Garrison, Commander Col. Stephen E. Dawson
- U.S. Army Garrison, Environmental Division
- U.S. Army Garrison, Natural Resource Section
- U.S. Fish and Wildlife Service
- U.S. Fish and Wildlife Service, O‘ahu National Wildlife Refuge Complex
- U.S. Geological Survey, Pacific Island Ecosystems Research Center

#### STATE AGENCIES

- Aha Moku Councils
- Department of Business, Economic Development & Tourism
- Department of Hawaiian Homelands
- Department of Health
- Department of Health, Office of Environmental Quality Control
- DLNR Division of State Parks
- DLNR Land Division
- DLNR Office of Conservation and Coastal Lands
- DLNR State Historic Preservation Administration
- HDOA Plant Pest Control

- HDOA Plant Quarantine
- Land Use Commission
- Office of the Governor
- Office of Hawaiian Affairs
- University of Hawai‘i, College of Tropical Agriculture and Human Resources
- University of Hawai‘i, Environmental Center
- University of Hawai‘i, Pacific Cooperative Studies Unit

#### **CITY AND COUNTY AGENCIES**

- Honolulu City Council
- City and County of Honolulu, Office of the Mayor
- City and County of Honolulu, Board of Water Supply
- City and County of Honolulu, Department of Planning and Permitting
- Hawai‘i County Council
- Hawai‘i County, Office of the Mayor
- Hawai‘i County, Department of Water Supply
- Hawai‘i County, Department of Planning
- Kaua‘i County Council
- Kaua‘i County, Office of the Mayor
- Kaua‘i County, Department of Planning
- Kaua‘i County, Department of Water Supply
- Maui County Council
- Maui County Office of the Mayor
- Maui County, Department of Planning
- Maui County, Department of Water Supply

#### **ORGANIZATIONS**

- Big Island Invasive Species Committee
- Bishop Museum
- Conservation Council of Hawai‘i
- Environment Hawai‘i Inc.
- Hawai‘i Audubon Society
- Hawai‘i Cattlemen’s Council
- Hawai‘i Conservation Alliance
- Hawai‘i Forest and Trail
- Hawai‘i Forest Industry Association
- Hawaiian Botanical Society
- Hawaiian Trail and Mountain Club
- KAHEA
- Kamehameha Schools

- Kaua'i Invasive Species Committee
- Ko'olau Mountains Watershed Partnership
- Maui Invasive Species Committee
- Moloka'i Invasive Species Committee
- Native Hawaiian Advisory Council
- Native Hawaiian Legal Corporation
- O'ahu Invasive Species Committee
- Pig Hunters Association of O'ahu
- Plant Extinction Prevention Program
- Sierra Club, O'ahu Chapter
- The Nature Conservancy of Hawai'i

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## Acronyms and Abbreviations

FONSI	Finding of No Significant Impact
FEA	Final Environmental Assessment
DLNR	State of Hawai'i Department of Land and Natural Resources
DOFAW	Division of Forestry and Wildlife
FAP	Forest Action Plan
HDOA	State of Hawai'i Department of Agriculture
HIBP	Hawai'i Interagency Biosecurity Plan
HRS	Hawai'i Revised Statutes
SWAP	State Wildlife Action Plan
USDA	U.S. Department of Agriculture

## PROJECT SUMMARY DESCRIPTION

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The Hawai'i Department of Agriculture and the Hawai'i Department of Land and Natural Resources propose the field release on State lands in Hawai'i of a butterfly with gregarious larvae, *Euselasia chrysippe* (Lepidoptera: Riodinidae), for biological control of miconia, *Miconia calvescens* (Melastomataceae).

Miconia is a Hawai'i State noxious weed native to Central and South America, from Mexico down to Argentina. In Hawai'i, large infestations exist on the islands of Hawai'i and Maui, and populations can also be found on Kaua'i and O'ahu. Miconia is shade-tolerant, growing and establishing in the understory of other species in mesic to wet forests. With its exceptionally large leaves, it shades and outcompetes other species, effectively forming a monoculture.

*Euselasia chrysippe* is a natural herbivore of miconia in the plant's native range in Costa Rica. *E. chrysippe* was found to be the most promising leaf-feeding biocontrol for miconia, because of the gregarious behavior of its larvae, which enables it to inflict more damage to miconia leaves and potentially avoid parasitoids of lepidopteran species already present in Hawai'i. Extensive testing has shown *E. chrysippe* to be host-specific to miconia and other closely related members of the Melastomataceae family, all of which are non-native weeds in Hawai'i.

Release of *E. chrysippe* is currently proposed for State lands on all islands where miconia has established. Spread of the insect from the initial release sites will occur both through natural dispersal and via artificial redistribution by managers between sites. It is expected that *E. chrysippe* will range statewide within a few years of release. State and federal land management agencies will closely monitor the effectiveness of the biocontrol release.

The proposed action requires Plant Protection and Quarantine permits from the U.S. Department of Agriculture, Animal and Plant Health Inspection Service; a permit for import and liberation of restricted organisms from the Hawai'i Department of Agriculture, Plant Quarantine Branch; and a permit for release and monitoring of the insect on State forest land from the Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife.

An alternative to the proposed action considered in this assessment is no action. Under this alternative, *E. chrysippe* would not be released on State forest land, and management of miconia would be limited to currently existing mechanical and chemical controls, which serve to limit spread to high value sites, but are economically and ecologically unviable at the landscape scale.

Because *E. chrysippe* is limited to feeding on a small pool of closely related species, all of which are invasive, its release is expected to be beneficial to Hawai'i's forests and hydrology, and adverse effects are expected to be negligible. Therefore, the determination from this Final Environmental Assessment is a Finding of No Significant Impact (FONSI).

## 1.0 INTRODUCTION

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This Final Environmental Assessment (FEA) supports a proposed field release of a gregarious defoliating caterpillar, *Euselasia chrysippe*, which will be used to control miconia, *Miconia calvescens* (Melastomataceae), a Hawai'i state noxious weed. The proposing agency for this program is the State of Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR DOFAW).

The proposed action of releasing a biological control agent has the potential to impact the local environment and involves the use of state and federal funds and approval of permits. Therefore, in accordance with Hawai'i

Revised Statutes (HRS) Chapter 343, the Hawai‘i Environmental Policy Act, and the National Environmental Policy Act, the proposing agencies have conducted an Environmental Assessment (EA) of the proposed project.

This EA identifies proposed and alternative actions of the project, describes the affected physical and biological environments, and analyzes potential environmental impacts to the existing environment resulting from the proposed action.

## **1.1 Purpose and Need**

Under Hawai‘i State Law (HRS Chapter 152), a “noxious weed” is defined as “any plant species which is, or which may be likely to become, injurious, harmful, or deleterious to the agricultural, horticultural, aquacultural, or livestock industry of the State and to forest and recreational areas and conservation districts of the State, as determined and designated by the department from time to time.” The HDOA’s Plant Pest Control Branch is responsible for limiting plant pest populations that have the potential to cause significant economic damage in the state.

Miconia, a fast-growing tree in the Melastomataceae family, is a major threat to forest ecosystems in Hawai‘i. Miconia was first introduced to Hawai‘i in 1961 as an ornamental and quickly invaded Hawai‘i’s forests. It was declared a noxious weed in 1992 (Kaiser 2006) and continues to be one of Hawai‘i’s most threatening and invasive plants (Figure 1).

Mechanical and chemical methods of control have been underway to attempt to keep the species from spreading; however, long-term management of miconia relies on biocontrol as a critical tool. Release of this proposed biocontrol agent will help to reduce tree vigor and growth, while future agents may aim to reduce seed production, population densities, and seedling establishment and survival.

### **1.1.1 Biocontrol**

When a pest species is introduced to a novel habitat, either intentionally or accidentally, it often arrives without the species (pathogens, herbivores, or parasites) that keep its populations in check in its native range. The Enemy Release Hypothesis states that one of the reasons for the unusually high success of an invasive species in its new habitat is because of this lack of top-down control from a species’ natural enemies (Keane and Crawley 2002). One tool for controlling a species’ population is reintroducing the species’ natural enemy into the novel habitat in which it has become a pest. This process is called biological control, or biocontrol.

The use of biocontrol agents for invasive weeds in natural areas has some advantages over mechanical or chemical control. In particular, when a pest has spread to large swaths of area and/or to remote locations, biocontrol can provide an enduring, cost-effective, and environmentally friendly solution (Howarth 1991). One concern about the introduction to a new habitat of a new species for biocontrol is the potential for adverse effects on species it was not intended to suppress, or what are termed “non-target impacts”. A candidate biocontrol species undergoes intensive testing in order to minimize risk of non-target impacts and maximize effectiveness.

## 1.2 Target Species: *Miconia calvescens* - Miconia



Figure 1. *Miconia* (*Miconia calvescens*); Photo by Forest and Kim Starr.

**Taxonomy:** *Miconia calvescens* DC. (Synonyms: *Cyanophyllum magnificum* Groenland, *Melastoma arborea* Velloso, *Melastoma mandioccana* Raddi, *Miconia arborea* Pav. ex Triana, *Miconia magnifica* Triana, *Miconia velutina* L. Linden & Rodigas) belongs to the pantropical Melastomataceae family. The genus *Miconia* Ruiz & Pavón is the largest genus of new world plants and contains more than 1,500 species ranging from Mexico to the Caribbean to Uruguay and northern Argentina (Mabberley 2017). *Miconia calvescens* is the main species in the genus to be popularized as an ornamental; uses for other species in the genus include lumber (*M. longistyla*), edible berries (*M. macrophylla*), dyeing (*M. cinnamomifolia*), and medicinal (*M. agrestis*, *M. fothergilla*) (Meyer 2009).

**Description:** *Miconia calvescens* can grow up to 16 meters tall, but usually reaches closer to 4–12 meters. Its oblong-elliptical to elliptical-ovate leaves are glabrous, 20–80 cm long and 8–30 cm wide, with acuminate tips and an obtuse or rounded base. The bicolored form seen in Hawai‘i has dark green leaves with purple undersides with entire or slightly toothed margins. Inflorescences are panicles 20–35 centimeters long. Sessile flowers are 5-merous and have oblong caducous bracteoles 2–3 mm in length. Hypanthium is 2–2.7 mm long; calyx tube is 0.6–0.7 mm long. Petals are white and glabrous on the surfaces but sometimes sparsely glandular around the edges, 2–3 mm long, 1–2 mm wide, oblong-obovate. Stamens slightly dimorphic; filaments 3–4 mm, glabrous or very sparsely glandular. Stigma slightly expanded; style glabrous or sparsely glandular, slightly immersed in the ovary apex; ovary 3-celled and 1/2–2/3 inferior, the apex granulose or sparsely glandular. Fruits are globose, purplish-black, 3.5–4.5 mm in diameter, containing ovoid to pyramidal seeds around 0.5 mm long (Weber 2003).

**Distribution:** *Miconia* is native to Central and South America, from Mexico down to Argentina. In Hawai‘i, it was introduced to Wahiawa Botanical Garden by Joseph Rock in 1961, was subsequently introduced to other botanical gardens on Oahu, and had reached the island of Hawai‘i by 1964, Maui in the early 1970s, and Kauai by the early 1980s. Large infestations exist on the islands of Hawai‘i and Maui, and populations

can also be found on Kaua'i and O'ahu. Efforts to control miconia were first initiated in 1991 on the island of Maui, near Hana. By that time, it had already spread widely. More than 20,000 plants were removed from Hana between 1991 and 1993 (Thomas 1997).

**Habitat:** *Miconia* is rarely seen in its native range, which extends from southern Mexico to northern Argentina. The bicolored form with purple undersides to the leaves found in invaded regions is restricted to Central America. *Miconia* is found in tropical or wet forests where the mean annual rainfall is greater than 2,000 mm and mean temperature is over 22 degrees Celsius. It has a broad elevational range from the lowlands up to 1,800 meters in elevation and grows in disturbed or second-growth forests, in semi-open areas. *Miconia* is an early successional species, colonizing small gaps, forest edges, streambanks, and trailsides, and only rarely grows in the understory of dense primary forest. This species' invaded range is very similar to its native range (Meyer 2009).

**Impact:** *Miconia* is a major threat to forest ecosystems in Hawai'i. It was declared a Hawai'i state noxious weed in 1992 and continues to be one of Hawai'i's most invasive plants. *Miconia* trees form dense stands (Figure 2) and their large leaves shade out native forest trees. Over time, *miconia* can come to dominate a forest. Each plant can produce over 20,000 seeds per fruiting season, and each seed may remain viable for more than 16 years. Seeds are dispersed long distances by animals such as birds and rats and can be spread by wind, water, or humans (CABI 2019, Hawaii Invasive Species Council 2019).



**Figure 2. *Miconia calvenscens* infestation in Onomea, Big Island; Photo by Forest and Kim Starr.**

**Management:** Early efforts to contain *miconia*'s rampant spread formed the basis of Hawai'i's invasive species management. Mechanical and chemical methods of control have been underway in Hawai'i to attempt to keep the species from spreading, including the use of triclopyr herbicide and the use of Herbicide Ballistic Technology, which targets *miconia* plants from a helicopter. Despite many successes in using chemical control, this species continues to proliferate, particularly on Maui and Hawai'i Islands, and long-term management of *M. calvenscens* will depend on the use of biocontrol agents (Ashe 2017). To date only one biocontrol agent has

been released against miconia, the leaf spot pathogen *Colletotrichum gloeosporioides*, with only minor impacts in Hawaii (Seixas et al. 2007).

**Natural Enemies:** The first exploration for natural enemies of miconia within its native range was conducted in Costa Rica, Brazil, and Trinidad in 1993–1995 by Robert Burkhart, exploratory entomologist for the Hawai'i Department of Agriculture. Further exploratory work by plant pathologists in Brazil resulted in the 1997 introduction of a fungal pathogen for biocontrol in Hawaii (Seixas et al. 2007). Beginning in 2000, additional surveys and detailed studies of enemies of miconia were conducted by students at the University of Costa Rica (Hanson et al. 2009) and the Federal University of Vicosa, Brazil (Picanço et al. 2005). Collections have identified a wide variety of natural enemies feeding on miconia, including dozens of Lepidoptera species, many species of Coleoptera, some Hemiptera, and several plant pathogens. Some of these enemies have been prioritized for development as biocontrol agents (Johnson 2009).

### 1.3 Biocontrol Agent: *Euselasia chrysippe*

The proposed biocontrol agent is *Euselasia chrysippe*, a gregarious defoliating caterpillar. The native range of this species extends from southern Mexico to Colombia and its elevational range starts at sea level and extends up to 1,500 meters (Nishida 2010). In Costa Rica, it is found on the Caribbean and Pacific slopes in both primary and secondary rain forests (Allen 2012; Nishida 2010). Caterpillars and eggs of *E. chrysippe* have only been collected from taxa in the Melastomataceae family, specifically *Miconia calvescens*, *M. impetiolaris*, *M. trinervia*, *M. elata*, *M. appendiculata*, *M. donaena*, *M. longifolia*, and *Conostegia rufescens* (DeVries 1997; DeVries et al. 1992; Janzen and Hallwachs 2009; Nishida 2010). Release of this candidate leaf-eating biocontrol will help to reduce tree vigor and growth. Other candidate agents for future release will aim to impact seed production, population densities, and/or seedling establishment and survival (Johnson 2009).

**Taxonomy:** *Euselasia chrysippe* (Bates 1866) is classified under the family Riodinidae, or metalmark butterflies, in the subfamily Euselasiinae. Euselasiinae is restricted to the subtropics and contains five genera; all except *Euselasia* contain few taxa. *Euselasia*, by contrast, contains around 170 described species. Despite the relative abundance of this genus, little is known about its members outside of a few pest species of *Eucalyptus* (Nishida 2010).

**Description of Adults:** Males of this species have a reddish-orange discal area of the upper surface wings, whereas females are yellowish-orange. Both sexes have 5–7 black spots along the margins on the underside of the hindwings (Nishida 2010).

**Description of Larvae:** Sixth instar description from Nishida (2010):

The sixth instar *Euselasia chrysippe* is greenish-dark-gray to greenish-dull black; the head capsule width is ca. 1.65 mm; the color of the head is bright orange, black, or a mixture of these two; arrowhead setae are cone-shaped (not flattened), ridged, and spiraled apically; the curvature of the ventral margin of the labrum is narrowly angled (ca. 110°); the mandible is small (0.38 mm wide), with the dentation less distinct than in *E. bettina*, and the extension of the fifth tooth is somewhat widened at edge; the T1 shield is orange to bright orange and without iridescence; the pinacula on the dorsum have a pale-gray oval line; the iridescence on structural color plates is faint metallic-blue; a proleg on A10 has 11–13 crochets in mesoseries.

**Distribution:** The native range of *Euselasia chrysippe* extends from southern Mexico to Colombia (DeVries 1997) and its elevational range starts at sea level and extends up to 1,500 meters (Nishida 2010). Studies reported here involve *E. chrysippe* collected from a few different sites on the Caribbean side of Costa Rica, from two of its host plants, *Miconia calvescens* and *Miconia impetiolaris*.

**Life History:**

In captive rearing conditions, the duration of the *E. chrysippe* life cycle from egg to emergence of the adult butterfly from the pupa is approximately 8 weeks. Both male and female adults have been shown to live for longer than a month (Nishida 2010). The caterpillars have six instars that feed primarily on the undersides of young fully opened leaves of their host, consuming the whole leaf (Johnson 2009). As with all known members of the tribe Euselasiini, *E. chrysippe* caterpillars hatch, feed, rest, molt, and pupate together in a single sibling cohort of up to 100 individuals (Allen 2010; Nishida 2010). This gregarious behavior is thought to assist the species with feeding on tough leaves, which optimizes foraging. In addition, traveling as a large group provides a defense against predation and may contribute to the low parasitism rates on this species observed in their home range (Allen 2010).

Recorded host plants for the genus *Euselasia* include members of Euphorbiaceae, Clusiaceae, Myrtaceae, Melastomataceae, Sapotaceae, and Vochysiaceae; however, caterpillars and eggs of *E. chrysippe* have only been collected from the family Melastomataceae, specifically *Miconia calvescens*, *M. impetiolaris*, *M. trinervia*, *M. elata*, *M. appendiculata*, *M. donaena*, *M. longifolia*, and *Conostegia rufescens* (Nishida 2010). Preliminary no-choice host tests conducted by Nishida (2010) found that larvae collected from *M. impetiolaris* would feed on *Conostegia xalapensis* and *M. calvescens* (Melastomataceae) but exhibited no feeding on two *Eucalyptus* spp., *Eugenia truncata*, and *Psidium guajava* (Myrtaceae) or *Clusia flava* (Clusiaceae).

**Natural Enemies:** One of the biggest issues of concern when introducing a biocontrol and ensuring its success is parasitism by insects previously introduced either for the control of other arthropods, or through accidental means. Previously reported parasitoids of the genus *Euselasia* include taxa in Chalcididae, Ichneumonidae, Trichogrammatidae (all in Hymenoptera), and Tachinidae (Diptera) (Johnson 2009; Nishida 2010). One egg parasitoid (*Encarsia* cf. *porteri* (Hymenoptera: Ahelinidae)) and two genera of solitary tachinid parasitoids that attack late instar larvae and emerge from the host once it has begun to pupate have been recorded from *E. chrysippe* (Nishida 2010). Species in the subfamily Riodininae do not share the usual parasitoids of Lepidoptera (Johnson 2009) and no members of this family are native or have been introduced to Hawai'i (Nishida 2002) which further reduces the risk that a specialized parasite of *E. chrysippe* currently exists here.

#### **Effect on Target Weed:**

*Euselasia chrysippe* was selected as a leaf-feeding biocontrol of miconia in Hawai'i because its gregariously feeding larvae can cause substantial damage to leaves. When reared on potted plants, a cohort of 60–80 larvae will consume several hundred square centimeters of leaf tissue – equivalent to the area of one average-sized leaf. Damage is typically distributed across several leaves because larvae move to new feeding areas between meals. Damage also includes removal of portions of uneaten leaves, presumably to reduce detection by natural enemies (Figure 3) (Puliafico et al. 2015).

Although extensive defoliation by *E. chrysippe* is not observed in Costa Rica, its populations are presumed to be limited by natural enemies there. If introduced to Hawai'i, population growth is expected to be less constrained by enemies, allowing numbers of *E. chrysippe* to increase to levels sufficiently high to cause substantial defoliation. Damage is unlikely to be severe enough to kill miconia trees, but repeated partial defoliations may reduce growth and reproduction of trees and enhance light levels for plants competing with miconia (Johnson, T. pers. comm).



Figure 3. *Euselasia chrysippe* larvae defoliating *Miconia calvescens*.

### 1.3.1 Host Specificity

Understanding host specificity, or the ability of a candidate biocontrol agent to carry out its life cycle on both the target and any possible non-target organisms is an important step in evaluating potential effects of the candidate agent on non-target species. Potential non-target hosts of *E. chrysippe* were selected by employing the Centrifugal Phylogenetic Method. This method is based on the hypothesis that a candidate biocontrol is more likely to feed upon plant species that are closely related phylogenetically to the preferred host species. The pool of non-target species is chosen by initially testing species within the same genus as the known host, then expanding out to include species in higher taxonomic ranks (family, then order, and so on).

Host specificity tests with larvae of *E. chrysippe* were conducted from 2012-2014 in laboratories in Hawaii, at the USDA Forest Service Insect Containment Facility, and in Costa Rica, at La Selva Biological Station. An emphasis was placed on plants in the order Myrtales, specifically on species within the Melastomataceae, Myrtaceae, Combretaceae, Lythraceae, and Onagraceae families. Relationships within the Melastomataceae were based on Clausing and Renner (2001). In addition, species from more distantly related taxa but with economic, cultural, and/or ecological significance in Hawai‘i were selected based on input from the U.S. Fish and Wildlife Service, consultations with members of the agricultural community, and expert sources on native Hawaiian plants. In total, 73 species of plants from 19 families were examined for suitability as hosts for *E. chrysippe* (Table 1). No-choice tests of each species (larvae exposed to only one plant species for 3 days) were conducted with leaves in 90-mm petri dishes and replicated 4-5 times.

Results of host specificity studies showed that among the 73 species tested, *E. chrysippe* larvae overwhelmingly prefer feeding and only survive on *Miconia calvescens* and a few close relatives within the tribe Miconieae (Table 1). Interestingly, two species, *Miconia crenata* (prev. *Clidemia hirta*) and *Miconia bicolor* (prev. *Tetrazygia bicolor*), which have recently been found through phylogenetic analyses to be better placed within the genus *Miconia* (Judd et al. 2014; Mabberley 2017), experienced the highest level of non-target feeding by *Euselasia* of all the species tested that are currently naturalized in Hawai‘i. No Melastomataceae are native to Hawai‘i, and nine of the 15 species naturalized in Hawai‘i have been declared state noxious weeds (Medeiros et al. 1997). Very low levels of feeding occurred on a few plants in families outside of Melastomataceae (Figures

4-5), but in all cases, survival of the larvae past the 3-day mark on species in these families was extremely low, and none developed into larger larvae.

Studies have clearly demonstrated that *E. chrysippe* is host-specific to a subset of Melastomataceae. Results of the host specificity studies are summarized below (Figures 4-6); additional information can be found in the cited literature (DeVries 1997; DeVries et al. 1992; Janzen and Hallwachs 2009; Nishida 2010). Laboratory tests are consistent with field observations of host range of *E. chrysippe* in Costa Rica, where eggs and larvae have been collected only from species of *Miconia*, specifically *M. calvescens*, *M. donaeana*, *M. impetolaris*, *M. appendiculata*, *M. longifolia*, *M. elata*, *M. trinervia*, and *Conostegia rufescens*, a plant in the same tribe (Nishida 2010). A similar pattern of specificity holds for other species within the genus *Euselasia*. Across numerous studies in various parts of tropical America, *Euselasia* have been found to be narrowly host-specific, with each species specializing within a family of plants (Nishida 2010).

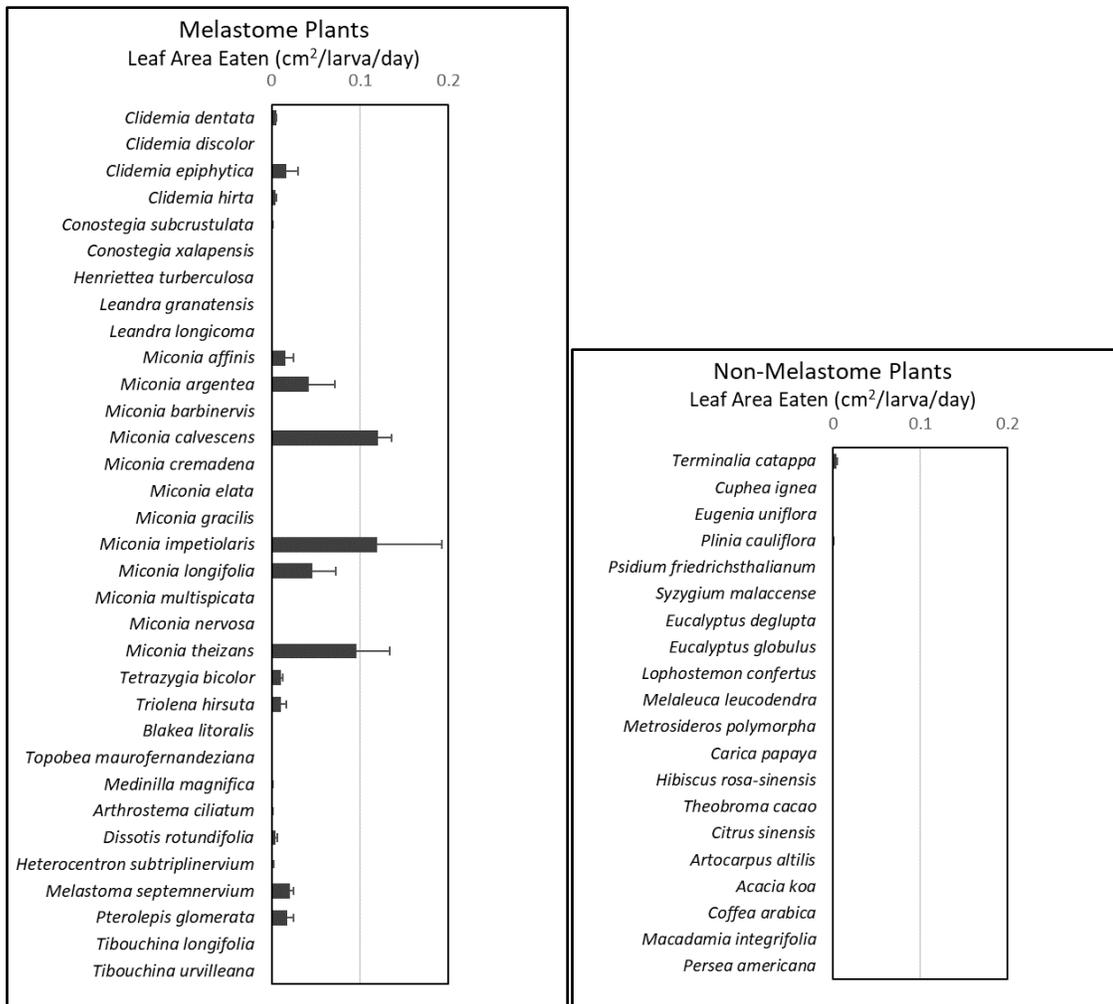
**Table 1. Plant species tested for the *Euselasia chrysippe* larval feeding in 3-day no-choice trials**

Order	Family Tribe	Test Plant Species	Common Name(s)	Native Range*	Present in Hawai'i?
Myrtales	Melastomataceae Miconieae	<i>Clidemia dentata</i>		SCA	
		<i>Clidemia discolor</i>		SCA	
		<i>Clidemia epiphytica</i>		SCA	
		<i>Clidemia hirta</i>	clidemia, Koster's curse	SCA	yes
		<i>Conostegia subcrustulata</i>		SCA	
		<i>Conostegia xalapensis</i>		SCA	
		<i>Henriettea turberculosa</i>		SCA	
		<i>Leandra granatensis</i>		SCA	
		<i>Leandra longicoma</i>		SCA	
		<i>Miconia affinis</i>		SCA	
		<i>Miconia argentea</i>		SCA	
		<i>Miconia barbinervis</i>		SCA	
		<i>Miconia calvescens</i>	miconia	SCA	yes
		<i>Miconia cremadena</i>		SCA	
		<i>Miconia elata</i>		SCA	
		<i>Miconia gracilis</i>		SCA	
		<i>Miconia impetolaris</i>		SCA	
		<i>Miconia longifolia</i>		SCA	
		<i>Miconia multispicata</i>		SCA	
		<i>Miconia nervosa</i>		SCA	
		<i>Miconia prasina</i>		SCA	
		<i>Miconia theizans</i>		SCA	
				<i>Tetrazygia bicolor</i>	
	Bertolonieae	<i>Triolena hirsuta</i>		SCA	

Order	Family Tribe	Test Plant Species	Common Name(s)	Native Range*	Present in Hawai'i?
	Blakeaceae	<i>Blakea litoralis</i>		SCA	
		<i>Topobea maurofernandeziana</i>		SCA	
	Dissochaeteae	<i>Medinilla cummingii</i>		IM	yes
		<i>Medinilla magnifica</i>	showy medinilla	AU/IM	yes
	Melastomeae	<i>Arthrostemma ciliatum</i>	pinkfringe	SCA	yes
		<i>Dissotis rotundifolia</i>	pink lady, rockrose	AF	yes
		<i>Heterocentron subtripplinervium</i>	pearlflower	SCA	yes
		<i>Melastoma sanguineum</i>	fox-tongued melastome	IM	yes
		<i>Melastoma septemnervium</i>	Asian melastome	IM	yes
		<i>Pterolepis glomerata</i>	false meadowbeauty	SCA	yes
		<i>Tibouchina herbacea</i>	cane tibouchina	SCA	yes
		<i>Tibouchina longifolia</i>	long leaf glory tree	SCA	yes
		<i>Tibouchina urvilleana</i>	princess flower, glorybush	SCA	yes
	Combretaceae	<i>Terminalia catappa</i>	false kamani	AU/IM	yes
	Lythraceae	<i>Cuphea ignea</i>	cigar flower	SCA	yes
		<i>Lythrum maritimum</i>	pukamole	SCA	yes
	Myrtaceae	<i>Eucalyptus deglupta</i>	rainbow eucalyptus	IM	yes
		<i>Eucalyptus globulus</i>	blue gum	AU	yes
		<i>Eugenia uniflora</i>	Surinam cherry, pitanga	SCA	yes
		<i>Lophostemon confertus</i>	brushbox, Brisbane box	AU	yes
		<i>Melaleuca leucadendra</i>	weeping paperbark	AU/IM	yes
		<i>Metrosideros macropus</i>	lehua mamu	HI	yes
		<i>Metrosideros polymorpha</i>	'ohi'a lehua	HI	yes
		<i>Plinia cauliflora</i>	jaboticaba	SCA	yes
		<i>Psidium cattleianum</i>	strawberry guava	SCA	yes
		<i>Psidium friedrichsthalianum</i>	Costa Rican guava	SCA	yes
		<i>Psidium guajava</i>	common guava	SCA	yes
		<i>Rhodomyrtus tomentosa</i>	downy myrtle, rose myrtle	IM	yes
		<i>Syzygium cumini</i>	Java plum	IM	yes
		<i>Syzygium malaccense</i>	mountain apple,	AU/IM	yes
	Onagraceae	<i>Epilobium ciliatum</i>	willowherb	NA/SCA/IM	yes
		<i>Fuchsia magellanica</i>	hardy fuchsia	SCA	yes
		<i>Oenothera laciniata</i>	cutleaf evening primrose	NA	yes
Geraniales	Geraniaceae	<i>Geranium homeanum</i>	Australasian geranium	AU	yes
Brassicales	Caricaceae	<i>Carica papaya</i>	papaya	SCA	yes

Order Family Tribe	Test Plant Species	Common Name(s)	Native Range*	Present in Hawai'i?
Malvales Malvaceae	<i>Hibiscus rosa-sinensis</i>	hibiscus	IM	yes
	<i>Theobroma cacao</i>	cacao	SCA	yes
Sapindales Anacardiaceae	<i>Mangifera indica</i>	mango	IM	yes
Rutaceae	<i>Citrus x sinensis</i>	lemon	IM	yes
Sapindaceae	<i>Dodonaea viscosa</i>	a'ali'i	COS/HI	yes
Rosales Moraceae	<i>Artocarpus altilis</i>	ulu, breadfruit	IM	yes
Fabales Fabaceae	<i>Acacia koa</i>	koa	HI	yes
	<i>Sophora chrysophylla</i>	mamane	HI	yes
Gentianales Rubiaceae	<i>Coffea arabica</i>	coffee	AF	yes
Lamiales Scrophulariaceae	<i>Myoporum sandwicense</i>	naio	HI	yes
Proteales Proteaceae	<i>Macadamia integrifolia</i>	macadamia	AU	yes
Alismatales Araceae	<i>Anthurium</i>	anthurium	SCA	yes
Laurales Lauraceae	<i>Persea americana</i>	avocado	SCA	yes
Cyatheales Dicksoniaceae	<i>Cibotium glaucum</i>	hapu'u	HI	yes

\*Native ranges: HI = Hawaiian native, SCA = Neotropical (South and Central America), NA = Nearctic (North America), AU = Australian, AF = Afrotropical, IM = Indomalayan, COS = Cosmopolitan



**Figure 4. Average feeding damage by small larvae (instars 1–2) of *Euselasia chrysippe* on plant species in Costa Rica and Hawai‘i exposed as fresh leaves for 3 days in 90-mm petri dishes in 2012–2014, measured from photos before and after testing (bar = standard error). Species in Melastomataceae on left are grouped according to genetic relatedness, and non-melastomes on right are listed in order of genetic distance from Melastomataceae.**

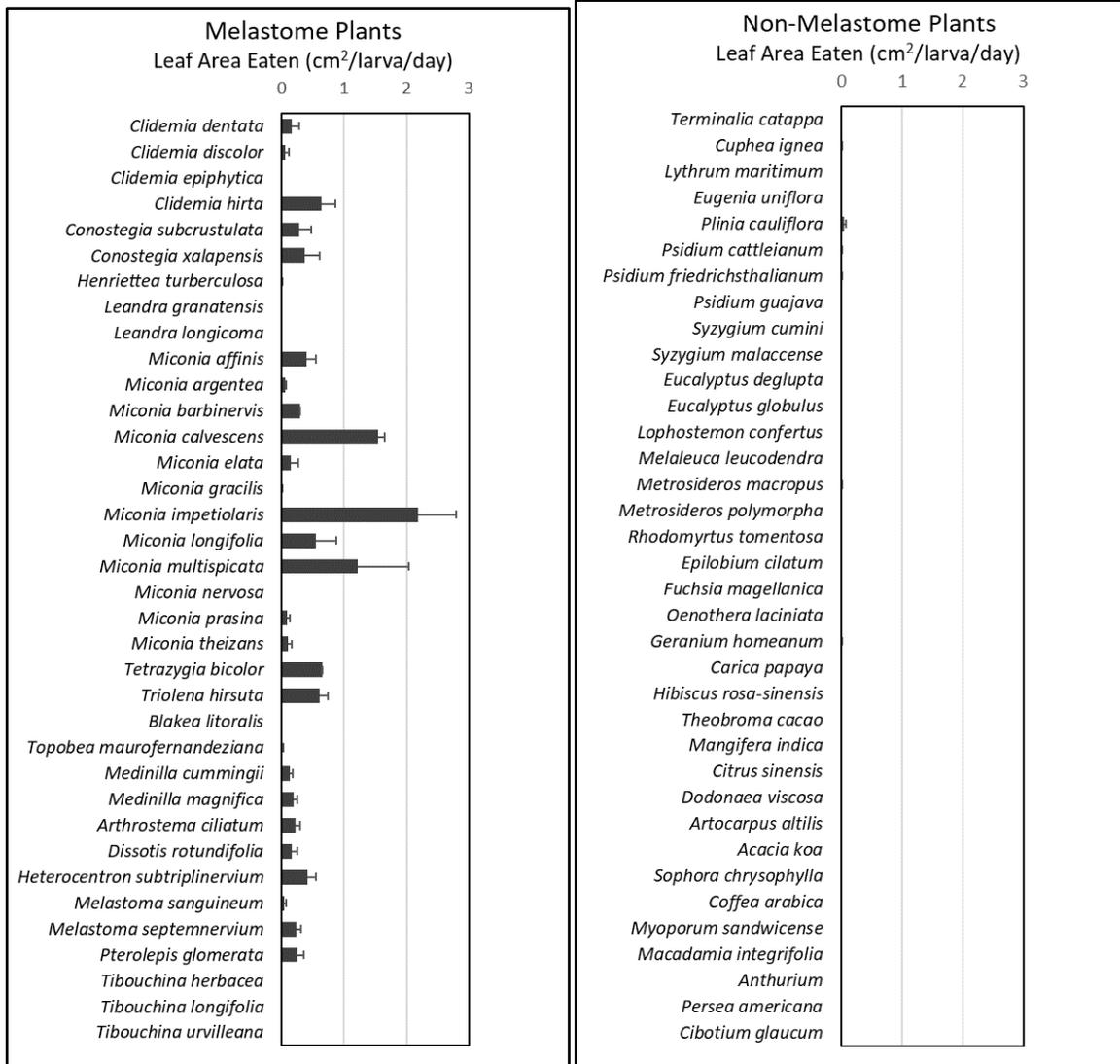
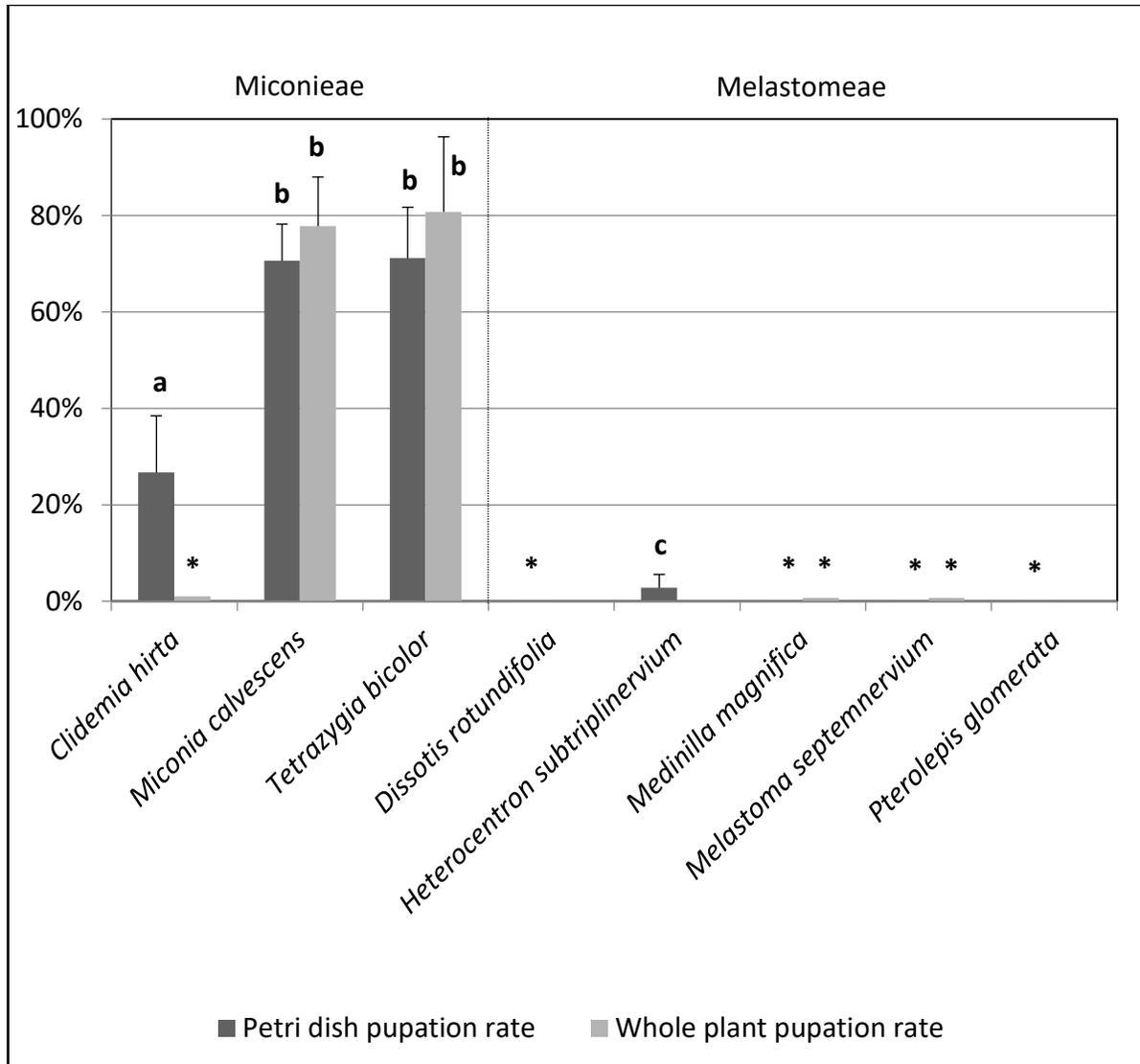


Figure 5. Average feeding damage by mid-sized larvae (instars 3–5) of *Euselasia chrysippe* on plant species in Costa Rica and Hawai‘i exposed as fresh leaves for 3 days in 90-mm petri dishes in 2012–2014, measured from photos before and after exposure (bar = standard error). Species on left, in the family Melastomataceae, are grouped according to genetic relatedness, and non-melastomes on right are listed in order of genetic distance from Melastomataceae.



**Figure 6. Average percent ( $\pm$  standard error) of *E. chrysippe* larvae surviving to pupation when exposed continuously in Petri dishes (dark gray) and whole plants (light gray) of test plant species in the tribes Miconieae and Melastomeae (family: Melastomataceae). Results with different letters (a,b,c) are statistically different. Results with an asterisk (\*) had negligible survival and were not tested in the statistical model.**

#### 1.4 Proposed Action

An application was submitted by the HDOA Plant Pest Control Branch to the HDOA Plant Quarantine Branch, 1849 Auiki Street, Honolulu, HI 96819, for a permit to introduce *Euselasia chrysippe* (Lepidoptera: Riodinidae), a gregarious defoliating caterpillar, into the State of Hawai‘i under the provisions of HRS Chapter 141, Department of Agriculture, and Chapter 150A, Plant and Non-Domestic Animal Quarantine. *Euselasia chrysippe* will be released to help control miconia (*Miconia calvescens* (Melastomataceae), which is considered one of the world’s worst weeds.

The U.S. Department of Agriculture (USDA) Forest Service plans on monitoring the impacts of the biocontrol after establishment, focusing on selected sites.

#### **1.4.1 Project Cost**

Although rearing of *E. chrysippe* requires specialized knowledge, the costs for distributing the insect for management will be relatively low after it is approved for release. Facilities, equipment, and personnel needed for rearing the insect are relatively simple; however, the process will require importation and careful screening of insects from Costa Rica. Establishing self-sustaining populations in field sites statewide likely can be accomplished within 1 year with a few staff working only part-time (estimate: \$60,000 for technical support in Costa Rica and Hawai‘i). Additional funding (\$60–100K) would support an organized effort to monitor establishment and impacts over the first 2 years following release. Agencies contributing to these efforts are expected to include the USDA Forest Service, HDOA, and State of Hawai‘i Department of Land and Natural Resources (DLNR). Invasive species committees, watershed partnerships, and others involved in weed management are expected to be active partners in identifying release sites and assisting in monitoring initial establishment.

Post-release monitoring, to determine whether the biocontrol is ultimately successful, will likely require a partnership of researchers and managers over a period of many years. Although specific methods have not yet been developed for the purpose of remote monitoring of insect feeding on miconia, it is likely possible to modify aerial detection techniques already in development.

#### **1.5 Affected Area**

The proposed release of *E. chrysippe* will be statewide. The first stage of release will focus on Miconia infestations on east Maui and east Hawai‘i, where the host species is most abundant. Many areas where miconia is known to occur are under some level of active management, and it would be a waste of effort to release biocontrol on plants that will soon be killed with herbicide. This sort of interference might present a challenge in the short-term for release and monitoring of effectiveness of *E. chrysippe*. However, in the long term, suppression of miconia through biocontrol is expected to be compatible with other control methods. In areas where active management focuses on containing the spread of miconia, *E. chrysippe* would ideally work by rapidly colonizing new miconia plants, even plants located at distances from established populations. A balance between use of biocontrol and other management tools will be established depending on the effectiveness of the *E. chrysippe* release and the availability of resources for other control methods (Johnson 2009).

Once successfully established, the butterfly may expand its range to other locations or islands both naturally and by additional releases. Actual dispersal rates are not known at this time but will be tracked and monitored following release.

#### **1.6 Sources of Primary Environmental Impact**

Primary impacts are defined in Hawaii Administrative Rule (HAR) §11-200-1 as “effects which are caused by the action and occur at the same time and place.” Primary impacts from the release of a biocontrol agent are the damages directly caused by the biocontrol agent; for example, feeding damage on non-target species. The potential impacts of this action are analyzed in Chapter 2.

#### **1.7 Sources of Secondary Environmental Impact**

Secondary impacts are defined in HAR §11-200-1 as “effects which are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable.” For example, one possible secondary impact could be a change in vegetation composition after successful suppression of miconia.

#### **1.8 Agency Identification**

The HDOA is the proposing agency responsible for the proposed action in accordance with HRS Chapter 343 and the National Environmental Policy Act.

## 1.9 Required Permits

The proposed action requires the following permits:

- Plant Protection and Quarantine permit from the USDA, Animal and Plant Health Inspection Service
- a permit for import and liberation of restricted organisms from the HDOA Plant Quarantine Branch upon review and approval by the Hawai'i Board of Agriculture
- a permit for access for release and monitoring of the insect on State forest land from the DLNR Division of Forestry and Wildlife (DOFAW)

## 1.10 Alternatives Considered

The No Action Alternative and Preferred Alternative (proposed action) are discussed below. Table 2 summarizes the advantages and disadvantages of each alternative.

### 1.10.1 No Action Alternative

Under the No Action Alternative, *E. chrysippe* will not be released for biocontrol of miconia. Under this alternative, control of miconia will be limited to the current options of using mechanical and chemical control methods. For incipient infestations of miconia that are easily accessible and limited in size, mechanical or chemical control may be preferred, since these methods have the advantage of a relatively short response time and minimal initial investment in staff time and resources. However, for large infestations or remote locations (as is the case on most infested islands), mechanical and chemical controls can be much less cost-effective, often requiring access by helicopter, and increase use of herbicides and staff time. Given the current extent of infestation, the environmental and economic impacts required to eradicate the target weed will be unacceptable, and, given this species' propensity to disperse and proliferate, the likelihood of it continuing to invade currently uncolonized suitable habitats and islands despite best efforts is high.

### 1.10.2 Proposed Action (Preferred Alternative)

The proposed action is to issue permits for the release of a gregarious defoliating caterpillar, *Euselasia chrysippe*, in the State of Hawai'i for biocontrol of *Miconia calvescens*.

The Preferred Alternative has the advantage of providing long-term control of miconia at a landscape scale. Although the cost of research and development for biological control is relatively high compared to conventional mechanical and chemical controls, the benefits of a successful biocontrol release would accumulate over time, saving amounts of money that far surpass the up-front cost (Wright et al. 2012).

Although field release will be permanent and there is a possibility of non-target effects, extensive host-specificity trials have shown that the candidate biocontrol agent has a very limited host range within the Melastomataceae family, which contains no native species, and nine of the 15 species in this family naturalized in Hawai'i are classified as noxious weeds.

Table 2. Summary of Alternatives Considered and Their Associated Advantages/Disadvantages Compared to the Proposed Action

	<b>ACTIONS</b>	<b>ADVANTAGES</b>	<b>DISADVANTAGES</b>
<b>NO ACTION</b>	NOT RELEASING <i>E. CHRYSIPPE</i> ; MANAGEMENT OF <i>M. CALVESCENS</i> WILL RELY ON MECHANICAL AND CHEMICAL CONTROLS.	<ol style="list-style-type: none"> <li>1. EFFECTIVE FOR INCIPIENT INFESTATIONS IF RESPONSE IS WELL-TIMED.</li> <li>2. LOW INITIAL INVESTMENT REQUIRED.</li> <li>3. SHORT-TERM NEGATIVE EFFECTS ARE LIKELY REVERSIBLE.</li> </ol>	<ol style="list-style-type: none"> <li>1. ONLY PROVIDES SHORT-TERM CONTROL; CONTINUAL EFFORTS REQUIRED.</li> <li>2. ECONOMICALLY PROHIBITIVE FOR WIDESPREAD INFESTATION.</li> <li>3. INCREASED USE OF HERBICIDES AND STAFF TIME.</li> <li>4. GIVEN THE RESOURCES AVAILABLE, THE ENVIRONMENTAL IMPACT OF THE INVASIVE PLANTS WILL WORSEN.</li> </ol>
<b>PROPOSED ACTION</b>	FIELD RELEASE OF A GREGARIOUS DEFOLIATING CATERPILLAR SPECIES, <i>E. CHRYSIPPE</i> , IN THE STATE OF HAWAI‘I FOR BIOCONTROL OF <i>M. CALVESCENS</i>	<ol style="list-style-type: none"> <li>1. PROVIDES LONG-TERM, SUSTAINABLE CONTROL.</li> <li>2. ECOLOGICAL AND ECONOMIC BENEFITS ACCRUE PERMANENTLY.</li> <li>3. ABLE TO REACH AREAS THAT ARE INFEASIBLE BY MECHANICAL AND CHEMICAL CONTROLS.</li> </ol>	<ol style="list-style-type: none"> <li>1. REQUIRES SIGNIFICANT INVESTMENT IN RESEARCH AND MONITORING.</li> <li>2. IRREVERSIBLE ONCE ESTABLISHED.</li> <li>3. POSSIBLE NON-TARGET EFFECTS.</li> </ol>

## 2.0 AFFECTED ENVIRONMENT AND IMPACT ASSESSMENT

This section presents an overview of baseline, biological, physical, socio-economic, and cultural environments that the project may affect and the assessment of potential impacts and mitigation measures, when negative impacts are anticipated.

### 2.1 Biological Environment

Field observations in Costa Rica of *E. chrysippe* and quarantine studies in Hawai‘i strongly indicate that the proposed release of this biocontrol agent will not have any undesirable, negative, non-target effects on the biological environment of the Hawaiian Islands. Environmental impacts associated with the No Action Alternative of not issuing permits for release of *E. chrysippe* are those resulting from continued damage to the environment caused by miconia and those caused by other methods employed to control miconia infestations, both of which are now occurring. The proposed release and establishment of *E. chrysippe* is intended to reduce these impacts. In the absence of effective natural enemies of miconia, possible negative environmental impacts caused by repeated use of herbicides to control infestations add to the existing negative impacts caused by the displacement of desirable plants by the pest. Use of chemical herbicides to control miconia would be reduced if the proposed biological control agent becomes permanently established in the environment and is able to sufficiently impact population densities of miconia. The probability of establishment of the biocontrol and degree of control can only be determined after the proposed releases are made, but the outcome would fall between no effect (if the biological control agent fails to establish) and widespread suppression of the target species. There is risk for a biological agent to affect non-target species; however, rigorous tests on the host range can minimize this risk.

### **2.1.1 Direct Effect on the Target Species**

The direct effect on the target species is the reduction in fitness and abundance through herbivory. Feeding by *Euselasia chrysippe* will reduce the fitness of miconia wherever the insect and the plants interact. The degree of control will likely vary by location.

### **2.1.2 Direct Effect on Non-Target Species**

Extensive studies have demonstrated that *E. chrysippe* overwhelmingly prefers feeding and that larvae only survive on *Miconia calvescens* and a few close relatives within the tribe Miconieae (see Figure 5). No Melastomataceae are native to Hawai‘i, and nine of the 15 species naturalized in Hawai‘i have been declared state noxious weeds (Medeiros et al. 1997).

### **2.1.3 Indirect Effect on Flora**

If the biocontrol release and establishment is successful, the sites previously occupied by miconia will become available to other plants. In less-degraded wet forest, native plants may benefit from the natural resources previously occupied by miconia. In more degraded plant communities, the target species are more likely to be replaced by nearby non-native species. These impacts are likely to progress slowly over a period of several years, which will allow time for appropriate management responses.

### **2.1.4 Indirect Effect on Fauna**

Native fauna is expected to benefit from the successful control of miconia, which poses a threat to native forests. Although miconia is a bird-dispersed species, there is no evidence that native birds use this species as a food source. A small number of native fauna might be indirectly affected by the proposed action if the target weeds are used for shelter; however, the effect is expected to be insignificant, as the native fauna that adapted to use the introduced species would be generalists, capable of using alternative plant species once the target species is removed.

### **2.1.5 Uncertainty of Non-Target Effect**

There is no action that has consequences that are completely predictable, and thus there is uncertainty associated with any proposed action, including this one. This uncertainty must be weighed against potential benefits of an action and the adverse impacts that are likely to continue to occur if an action is not undertaken. There is a consensus among biologists in Hawai‘i that miconia has a detrimental effect on native forests and that the severity of ecosystem damage is continually increasing. Uncertainty in the case of the proposed biocontrol release has been significantly reduced through decades of rigorous testing of the biocontrol agent. When weighed against the certainty of continued threat miconia poses to Hawaiian forests and resources, the level of uncertainty associated with the proposed action is found to be acceptable.

## **2.2 Physical Environment**

The following assesses potential impacts on the elements of the physical environment that may be affected by the proposed action.

### **2.2.1 Climate**

The proposed action will have no to very little effect on long-term or regional climate patterns. The proposed action may affect microclimates that are influenced by the invasive vegetation. Successful control of the invasive weeds is expected to enable the native vegetation to recolonize the invaded area, which will reduce the negative effect of the invasive weeds on the microclimates and should be beneficial to native biota.

### **2.2.2 Hydrology**

Although the proposed action will not directly affect hydrology, the successful suppression of miconia has the potential to indirectly affect hydrology in a positive direction. A study by Giambelluca et al. (2010) postulated that miconia, with its large leaves that both shade out other species and produce large drops off their tips, has the potential to impact hydrology by increasing erosion and flooding. This plausible hypothesis remains to be thoroughly tested. In addition, miconia's shallow root system can cause erosion and landslides when the trees are taken down by heavy rainfall. Once miconia is suppressed, it is expected that hydrological function of the invaded forest would improve due to decreased erosion and landslides.

### **2.2.3 Soils**

The proposed action of suppressing miconia through the release of a natural enemy of this species is expected to decrease miconia's negative impacts on soil processes, including erosion and landslides.

### **2.2.4 Wildland Fires**

The proposed action is expected to have negligible effects on wildland fire. Although the biocontrol has the potential to create small amounts of dead biomass of miconia, the range of this species is in mesic to wet forests, where the risk of wildland fire is low.

## **2.3 Cultural Resources**

ASM Affiliates Hawai'i, a Heritage and Cultural Resource Management firm, prepared a Cultural Impact Assessment (CIA) for the proposed action, summarized below and attached as Appendix B. The CIA was prepared in adherence with the Office of Environmental Quality Control (OEQC) *Guidelines for Assessing Cultural Impacts*, adopted by the Environmental Council, State of Hawai'i.

In general, a CIA is intended to inform environmental studies that are conducted in compliance with HRS Chapter 343. The purpose of a CIA is to gather information about the practices and beliefs of a cultural or ethnic group or groups that may be affected by the actions subject to HRS Chapter 343.

The primary focus of the CIA is to elucidate the cultural and historical context of miconia in Hawai'i. It includes a cultural-historical context of the settlement of the Hawaiian Islands by early Polynesian settlers and the transformation of their beliefs and practices associated with the land following western contact, an overview of the history of biocontrol in Hawai'i, and a discussion of the introduction of miconia to the Hawaiian Islands. It also includes a discussion of potential impacts as well as appropriate actions and strategies to mitigate those impacts.

### **2.3.1 Location**

Normally, a CIA assesses the potential impacts on cultural practices and features within a geographically defined "project area," which is usually defined by an established Tax Map Key number or numbers. However, CIAs conducted for biocontrol projects differ in that the assessment must consider statewide impacts with an emphasis on those areas where the target species is most abundant.

### **2.3.2 Consultation**

The goal of conducting interviews for the CIA was to identify potential cultural resources, practices, and beliefs associated with miconia and its invaded habitat. Gathering input from community members with genealogical ties and/or long-standing residency or relationships to the anticipated areas of impact or target species is vital to the process of assessing potential impacts to resources, cultural practices, and belief systems.

In an effort to identify individuals knowledgeable about traditional cultural practices and/or uses associated with miconia or the habitat in which it thrives, a public notice was submitted to the Office of Hawaiian Affairs (OHA) for publication in their monthly newspaper, Ka Wai Ola, and was published in the May 2019 issue. No responses were received as a result of the Ka Wai Ola publication, so 45 individuals were contacted directly. These individuals were selected because they were either recognized cultural practitioners, plant experts, or Native Hawaiian organizations who utilize Hawai‘i’s forest resources for cultural purposes or were believed to have cultural knowledge about the target species or other plants found within the target species habitat. Of the forty-five individuals contacted, twenty individuals responded to our request with either brief comments, referrals, or accepting the interview request. The names and affiliations of these twenty individuals are listed in Table 3 below. Of the twenty respondents, ASM staff successfully conducted interviews with nine individuals (see summaries in Table 3). A complete list of all people contacted for consultation is available upon request.

The interviewees were asked a series of questions regarding their background and experience and their knowledge of the target species and its habitat. Additional questions focused on any known cultural uses, traditions, or beliefs associated with miconia. The interviewees were also asked their opinions on the cultural appropriateness of using biocontrol control agents and any potential cultural impacts that could result from the use of biocontrol control, as well as any recommendations to mitigate any identified cultural impacts.

**Table 3. Persons contacted for consultation.**

<i>Name</i>	<i>Affiliation, Island</i>	<i>Initial Contact Date</i>	<i>Comments</i>
Shalan Crysdale	The Nature Conservancy, Ka‘ū Preserve, Hawai‘i	3/6/2019	See summary in Appendix B
John Repogle	Retired from The Nature Conservancy, Ka‘ū Preserve, Hawai‘i	3/6/2019	See summary in Appendix B
Nohealani Ka‘awa	The Nature Conservancy, Ka‘ū Preserve, Hawai‘i	3/6/2019	See summary in Appendix B
Arthur Medeiros	Auwahi Forest Restoration Project, Maui	3/7/2019	Responded via email on March 11, 2019, stating “Thank you for your valuable work supporting this essential action to attempt to slow the loss of Hawaiian biota.”
Jen Lawson	Waikōloa Dry Forest Initiative, Hawai‘i	4/3/2019	See summary in Appendix B
Robert Yagi	Waikōloa Dry Forest Initiative, Hawai‘i	4/3/2019	See summary in Appendix B
Wilds Brawner	Ho‘ola Ka Manaka‘ā at Ka‘ūpūlehu, Hawai‘i	4/9/2019	See summary in Appendix B
Sam ‘Ohu Gon III	The Nature Conservancy, O‘ahu	4/22/2019	Responded to interview request but was unable to provide input on this project.
Mike DeMotta	National Tropical Botanical Gardens, Kaua‘i	4/22/2019	See summary in Appendix B
Wili Garnett	Cultural practitioner, Moloka‘i	5/7/2019	Responded via email, but response did not include comments about <i>Miconia calvescens</i> biocontrol.
Emily Grave	Laukahi Network, O‘ahu	5/7/2019	Responded via email stating that she was not aware of cultural uses of this plant.

<i>Name</i>	<i>Affiliation, Island</i>	<i>Initial Contact Date</i>	<i>Comments</i>
Kim Starr	Starr Environmental, Maui	5/9/2019	See summary in Appendix B
Forest Starr	Starr Environmental, Maui	5/9/2019	See summary in Appendix B
Manaiakalani Kalua	Cultural practitioner, Hawai'i	5/30/2019	See summary in Appendix B
Robert Keano Ka'upu	Cultural practitioner, O'ahu	6/16/2019	Responded via phone that he has been interested in learning about the cultural uses of <i>wiliwili</i> but was not aware of any uses or of anyone else who used this wood for cultural purposes.
Hinaleimoana Wong-Kalu	Cultural practitioner, O'ahu	7/16/2019	Responded to interview request but was unable to secure an interview.
Pelchonamea Harman	Cultural practitioner, Hawai'i	7/31/2019	Referred ASM staff to Dennis Kana'e Keawe
Dennis Kana'e Keawe	Cultural practitioner, Hawai'i	8/12/2019	See summary in Appendix B
Iliahi Anthony	Cultural practitioner, Hawai'i	8/30/2019	See summary in Appendix B
Talia Portner	Honolulu Botanical Gardens, O'ahu	6/3/2019	Responded to interview request but was unable to secure an interview.

### **2.3.2 Summary of Findings, Identification of Cultural Impacts, and Proposed Mitigative Measures**

There is no evidence to suggest that miconia is important in any ethnic groups' cultural history, identity, cultural practices, or beliefs, nor does it meet the significance criteria outlined in the CIA. On the other hand, the mesic to wet forests this species invades could be considered significant as a traditional cultural property under Criterion E, since they are home to many culturally important indigenous and endemic taxa which are still used in Hawaiian cultural practices.

Based on background research and the interviews conducted for the CIA, it is the assessment of this study that the release of the proposed biocontrol agent, *Euselasia chrysippe*, will not result in impacts to any valued cultural, historical, or natural resources. On the other hand, if no action is taken to further reduce remaining populations of miconia from claiming more of Hawai'i's mesic to wet forest habitat, impacts to this valuable habitat would be anticipated.

## **2.4 Socio-economic Environment**

The action is not expected to negatively affect the socio-economic environment. The successful control of miconia will benefit the environment and may release the effort and resources expended by using chemical and mechanical control for other purposes.

### **2.4.1 Population**

The proposed action is expected to have negligible effect on population. Miconia has no economic value and the locations of the biocontrol release are uninhabited natural areas.

### **2.4.2 Existing Land Use**

The proposed locations of the biocontrol release will largely consist of conservation areas that are mainly used for watershed protection, conservation of native flora and fauna, and public recreation. The successful control of miconia is expected to benefit these intended uses by improving the integrity of the native forest, which is crucial to the conservation of biodiversity as well as recreational and watershed value.

### **2.4.3 Recreation**

Recreational use of the affected area is expected to benefit from the proposed action. The target species is a noxious weed that can degrade the recreational value of natural areas. Therefore, the control of miconia is expected to benefit recreation.

### **2.4.4 Scenic and Visual Resources**

The proposed action is expected to have negligible effect on scenic and visual resources. The effect of successful biocontrol will take place gradually over the span of years to decades. The change in scenic or visual value of the invaded area, therefore, will not dramatically change in a short time period. The areas of infestation are expected to be replaced by other vegetation and have minimal visual change at landscape level. The proposed action will have insignificant effect in scenic value and visual resources.

### **2.4.5 Household Nuisance**

*Euselasia chrysippe* is expected to remain localized on and near miconia, which grows mainly in uninhabited forested areas. Because of this, it is unlikely that *E. chrysippe* would become a nuisance to residents and visitors.

## 2.5 Consistency with Government Plans and Policies

The proposed action is consistent with all government plans and policies, especially those that call for conservation of natural resources.

### 2.5.1 Hawai'i State Plan

The *Hawai'i State Plan* was adopted in 1978. It was revised in 1986 and again in 1991 (HRS Chapter 226, as amended). The Plan establishes a set of goals, objectives, and policies that are meant to guide the State's long-term growth and development activities. The proposed project is consistent with State goals and objectives that call for increases in employment, income and job choices, and a growing, diversified economic base extending to the neighbor islands.

HRS Chapter 226-4 sets forth goals associated with the *Hawai'i State Plan*:

1. A strong, viable economy characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai'i's present and future generations.
2. A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.
3. Physical, social, and economic well-being, for individuals and families in Hawai'i, that nourishes a sense of community responsibility, of caring, and of participation in community life.

The aspects of the plan most pertinent to the proposed classification are the following:

HRS Chapter 226-11 *Objectives and policies for the physical environment—land-based, shoreline, and marine resources*. Planning for the State's physical environment with regard to land-based, shoreline, and marine resources shall be directed towards achievement of prudent use of Hawai'i's land-based, shoreline, and marine resources and effective protection of Hawai'i's unique and fragile environmental resources. To achieve the land-based, shoreline, and marine resource objectives, it shall be the policy of the State to:

- Exercise an overall conservation ethic in the use of Hawai'i's natural resources.
- Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.
- Take into account the physical attributes of areas when planning and designing activities and facilities.
- Manage natural resources and environs to encourage their beneficial and multiple uses without generating costly or irreparable environmental damage.
- Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.
- Encourage the protection of rare or endangered plant and animal species and habitats native to Hawai'i.
- Pursue compatible relationships among activities, facilities, and natural resources.
- Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational, and scientific purposes.

The proposed action is consistent with the goals, objectives and policies of the *Hawai'i State Plan*. Specifically, it will encourage the protection of rare or endangered plant and animal species and habitats through the control of the invasive weeds.

### 2.5.2 Hawai'i County General Plan

The County of Hawai'i's General Plan is the policy document expressing the broad goals and policies for the long-range development of the Island of Hawai'i. The plan was adopted by ordinance in 1989 and amended in 2005. The chapter on Natural Resources and Shoreline is the most relevant to the proposed project and include the following goals and policies:

#### Natural Resources and Shoreline – Goals:

- Protect and conserve the natural resources from undue exploitation, encroachment, and damage.
- Protect rare or endangered species and habitats native to Hawai'i.
- Protect and effectively manage Hawai'i's open space, watersheds, shoreline, and natural areas.

#### Natural Resources and Shoreline – Policies:

- Coordinate programs to protect natural resources with other government agencies.
- Encourage public and private agencies to manage the natural resources in a manner that avoids or minimizes adverse effects on the environment and depletion of energy and natural resources to the fullest extent.
- Encourage an overall conservation ethic in the use of Hawai'i's resources by protecting, preserving, and conserving the critical and significant natural resources of the County of Hawai'i.
- Encourage the protection of watersheds, forest, brush, and grassland from destructive agents and uses.
- Work with the appropriate State and federal agencies, as well as private landowners, to establish a program to manage and protect identified watersheds.

The proposed action would help to protect and conserve native species and habitats and is consistent with the policies for encouraging conservation ethics, watershed protection, and interagency coordination for the management of natural resources.

### 2.5.3 Kaua'i County General Plan

The General Plan for the County of Kaua'i is the document expressing the broad goals and policies for the long-range development and resource management for the Island of Kaua'i. First adopted in 1971, the Plan was revised in 1984 and 2000. The General Plan is thematically arranged, discussing issues including management of public facilities, preservation of rural character, and caring for land, water, and culture, among others. The General Plan also includes a chapter entitled "*Vision for Kaua'i 2020*", which states:

In 2020, management of development, agriculture, and other activities on Kaua'i is based on the related principles of ahupua'a and watershed. Land is developed and used in ways that conserve natural streams and streamflows; conserve habitat for native species of plants and animals, both on land and in the ocean; and preserve sandy beaches and coral reefs. Best management practices used by government agencies, agricultural companies, other businesses, and individuals are effective in avoiding increases in floodwaters downstream; preventing beach loss; and minimizing pollution of ocean waters. All of Kaua'i's waters are fishable and swimmable.

The proposed action is consistent with the vision of the Kaua'i County General Plan, specifically the successful control of miconia, and would contribute to conserving habitat for native plants and animals.

#### **2.5.4 Maui County General Plan**

The Maui County General Plan is a long-term, comprehensive blueprint for the physical, economic, environmental development, and cultural identity of the county. The plan, adopted on March 24, 2010, provides broad goals, objectives, policies, and implementing actions that portray the desired direction of the County's future. Furthermore, this Countywide Policy Plan provides the policy framework for the development of the Maui Island Plan and nine Community Plans. The Countywide Policy Plan is the outgrowth of and includes the elements of the earlier General Plans of 1980 and 1990. The portions of the plan pertaining to the Protection of the Natural Environment are the most relevant to the proposed project and include the following goals and objectives.

Goals: Maui County's natural environment and distinctive open spaces will be preserved, managed, and cared for in perpetuity.

Objective: Improve the opportunity to experience the natural beauty and native biodiversity of the islands for present and future generations. Policies to achieve the objective include the following:

- Perpetuate native Hawaiian biodiversity by preventing the introduction of invasive species, containing or eliminating existing noxious pests, and protecting critical habitat areas.
- Preserve and reestablish indigenous and endemic species' habitats and their connectivity.
- Restore and protect forests, wetlands, watersheds, and stream flows, and guard against wildfires, flooding, and erosion.
- Expand coordination with the State and nonprofit agencies and their volunteers to reduce invasive species, replant indigenous species, and identify critical habitat.

The proposed action is consistent with the goals, objectives, and policies of the Maui County General Plan to protect the natural environment through the control of miconia in order to conserve and restore native ecosystems and watersheds.

#### **2.5.5 City and County of Honolulu General Plan**

The City and County of Honolulu General Plan (1992 edition, amended in 2002) is a statement of objectives and policies that sets forth the long-range goals of O'ahu's residents and the policies to achieve them. It is the focal point of a comprehensive planning process that addresses the physical, social, economic, and environmental concerns affecting the City and County of Honolulu.

The policies most relevant to the proposed action are in the Natural Environment section:

- Seek the restoration of environmentally damaged areas and natural resources.
- Protect plants, birds, and other animals that are unique to the State of Hawai'i and the Island of O'ahu.
- Increase public awareness and appreciation of O'ahu's land, air, and water resources.

The proposed action is consistent with the objectives and policies of the plan concerning the natural environment. Specifically, the proposed action would contribute to the restoration of the natural environment and protection of native plants and animals through the control of the invasive weeds.

#### **2.5.6 Hawai'i's State Wildlife Action Plan**

The 2015 edition of Hawai'i's State Wildlife Action Plan (SWAP) details the strategy and plans of the DLNR and its partners to address the conservation needs of more than 10,000 species native to Hawai'i. This document is an update to the Comprehensive Wildlife Conservation Strategy 2005 plan and outlines a statewide strategy for conserving native wildlife species.

The SWAP identified the major threats to Hawai‘i’s native wildlife, which include the following:

- Loss and degradation of habitat resulting from human development, alteration of hydrology, wildfire, recreational overuse, natural disaster, and other factors
- Invasive species (e.g., habitat-modifiers, including weeds, ungulates, algae and corals, predators, competitors, disease carriers, and disease)
- Ecological consequences of climate change
- Limited information and insufficient management of information
- Uneven compliance with existing conservation laws, rules, and regulations
- Overharvesting and excessive extractive use
- Management constraints
- Inadequate funding

The SWAP sets goals to guide conservation efforts across the state to ensure protection of Hawai‘i’s Species of Greatest Conservation Need and the diverse habitats that support them. The following seven objectives have been identified as the elements necessary for the long-term conservation of Hawai‘i’s native wildlife:

- Maintain, protect, manage, and restore native species and habitats in sufficient quantity and quality to allow native species to thrive
- Combat invasive species through a three-tiered approach combining prevention and interdiction, early detection and rapid response, and ongoing control or eradication
- Develop and implement programs to obtain, manage, and disseminate information needed to guide conservation management and recovery programs
- Strengthen existing partnerships and create new partnerships and cooperative efforts
- Expand and strengthen outreach and education to improve understanding of our native wildlife resources among the people of Hawai‘i
- Support policy changes aimed at improving and protecting native species and habitats
- Enhance funding opportunities to implement needed conservation actions

Miconia is an invasive species that poses threats to the native ecosystem. The proposed project will address the threat of invasive species and provide a tool for resource managers to combat invasive species that would otherwise not be feasible due to management constraints and inadequate funding. The proposed project is consistent with the goals of SWAP because it provides a cost-effective tool for resource managers to combat miconia, one of Hawai‘i’s worst weeds, which will assist with maintaining, protecting, managing, and restoring native species and habitats.

### **2.5.7 Hawai‘i Interagency Biosecurity Plan**

The 2017–2027 Hawai‘i Interagency Biosecurity Plan (HIBP) is the State’s first multi-agency, comprehensive biosecurity plan that includes coordinated strategies to protect Hawai‘i’s agriculture, environment, economy, and health from invasive species. The HIBP identifies gaps in the current biosecurity system, which consists of a network of state agencies and partners working within the areas of pre-border, border, and post-border management, as well as public engagement. The plan creates a shared path forward to address these gaps through 147 actions.

This project is consistent with the actions identified in the HIBP related to biological control, which is an essential tool to address widespread invasive species that are difficult to control through conventional methods. Those actions include the following:

- Increase funding and staffing for Hawai‘i’s biological control programs
- Hire a biological control program coordinator, doubling the size of HDOA’s Biological Control Section Staff
- Build state-of-the-art biocontrol facilities equipped to develop effective biocontrol for high-impact target species

### **2.5.8 Hawai‘i Forest Action Plan**

The DLNR DOFAW is the lead agency in the development of the 2016 Hawai‘i Forest Action Plan (FAP), which covers all forest land ownerships (state, private, and federal) and enables DOFAW to continue to seek funding for landscape-scale management and to integrate the many programs the division administers through one planning document. The plan identifies nine priority areas for Hawai‘i’s forests, including the following:

- Water quality and quantity
- Forest health, invasive species, insects, and disease
- Wildfire
- Urban and community forestry
- Climate change and sea-level rise
- Conservation of native biodiversity
- Hunting
- Nature-based recreation
- Tourism

*Miconia* is an invasive plant species that poses a threat to water quality and quantity and conservation of native biodiversity. The FAP identifies plants that are non-native, invasive, and habitat-modifying as one of the current, most pervasive threats to native biodiversity in Hawai‘i, and discusses the negative impacts that invasive plants can have on the hydrological processes of forested watersheds.

The proposed project is consistent with the goals of the FAP, which supports and recommends a substantial increase in resources for biocontrol as a necessary tool in invasive species management and identifies biocontrol as one of the management approaches in the FAP.

## **3.0 DETERMINATION**

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Section 11-200-12 of the HAR sets forth the criteria by which the significance of environmental impacts shall be evaluated. The following discussion restates these criteria individually and evaluates the project’s relation to each.

1. *The project will not involve an irrevocable commitment or loss or destruction of any natural or cultural resources.*

The proposed action deals with specific interactions between the biological control agent and the target weed and is not expected to involve irrevocable commitment or loss or destruction of any natural or cultural resources.

2. *The project will not curtail the range of beneficial uses of the environment.*

The proposed action involves specific interactions between the biological control agent and the target weed and is not expected to curtail any beneficial uses of the environment.

3. *The project will not conflict with the State's long-term environmental policies.*

The proposed action is expected to benefit the environment by reducing the negative impact caused by the target weeds. This is in line with the State's long-term environmental policies.

4. *The project will not substantially affect the economic or social welfare of the community or State.*

The proposed action involves specific interactions between the biological control agent and the targeted noxious weed species and is not expected to affect the economic or social welfare of the community or State.

5. *The project does not substantially affect public health in any detrimental way.*

The proposed action involves specific interactions between the biological control agent and the target weed and will not impact public health.

6. *The project will not involve substantial secondary impacts, such as population changes or effects on public facilities.*

The proposed action involves specific interactions between the biological control agent and the target weed and is not expected to cause substantial secondary impacts.

7. *The project will not involve a substantial degradation of environmental quality.*

The proposed action deals with specific interactions between the biological control agent and the target weed and is expected to improve environmental quality by reducing the negative impacts caused by miconia to the environment.

8. *The project will not substantially affect any rare, threatened, or endangered species of flora or fauna or habitat.*

The proposed action is expected to benefit many rare, threatened, or endangered species of flora and fauna by reducing the negative impact caused by miconia on the biological environment.

9. *The project is not one which is individually limited but cumulatively may have considerable effect upon the environment or involves a commitment for larger actions.*

The proposed action does not involve a commitment for larger actions, and the cumulative effect is expected to be beneficial by reducing the overall impact of this invasive species on the environment.

10. *The project will not detrimentally affect air or water quality or ambient noise levels.*

The proposed action involves specific interactions between the biological control agent and the target weed species and is not expected to affect air or ambient noise levels. The suppression of this noxious weed species is expected to reduce erosion and runoff, leading to improved water quality.

11. *The project will not affect or will not likely be damaged by being located within an environmentally sensitive area such as floodplains, tsunami zones, erosion-prone areas, geologically hazardous lands, estuaries, fresh waters or coastal waters.*

The proposed action involves specific interactions between the biological control agent and the target weed and is subjected to damage by being located within an environmentally sensitive area.

12. *The project will not substantially affect scenic vistas or viewplanes identified in county or state plans or studies.*

The proposed action may temporarily reduce vegetation cover in affected natural areas but is not expected to substantially affect scenic vistas or viewplanes.

13. *The project will not require substantial energy consumption.*

The proposed action involves specific interactions between the biological control agent and the target weed species and will not require substantial energy consumption.

### **3.1 Conclusion**

For the reasons above, and in consideration of comments received during early consultation and the draft environmental assessment review period, DLNR DOFAW, with support from HDOA, has concluded that the proposed project will not have a significant impact in the context of HRS Chapter 343 and Section 11-200-12 of the HAR, and has determined a Finding of No Significant Impact (FONSI).

#### 4.0 DOCUMENT PREPARERS

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This FEA was prepared for the State of Hawai‘i, DLNR DOFAW. Agencies, firms, and individuals involved included the following:

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## **APPENDIX A: COMMENTS RECEIVED DURING EARLY CONSULTATION**

Thirteen letters of correspondence were received during the 30-day public comment period for release of *E. chrysippe* for the biological control of miconia.

ALAN M. ARAKAWA  
Mayor



DAVID S. TAYLOR, P.E.  
Director

GLADYS C. BAISA  
Deputy Director

**DEPARTMENT OF WATER SUPPLY**  
COUNTY OF MAUI  
200 SOUTH HIGH STREET  
WAILUKU, MAUI, HAWAII 96793-2155  
[www.mauiwater.org](http://www.mauiwater.org)

June 13, 2018

Department of Land and Natural Resources  
Division of Forestry and Wildlife  
1151 Punchbowl Street, Room 325  
Honolulu HI 96713  
Attn: Robert D. Hauff

RE: Early Consultation on Environmental Assessment for the state-wide release of the butterfly  
*Euselasia chrysippe* for biological control of the noxious weed *Miconia calvescens*

Dear Mr. Hauff:

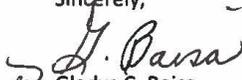
Thank you for the opportunity to provide comments on the above-stated project.

A sustainable future water supply depends on healthy watershed forests for adequate surface and groundwater recharge. DWS has granted over \$5 million in financial support to the Maui Invasive Species Committee (MISC) through our Watershed Protection Grants Program since 1999. Their main project directive has been to contain and eradicate several major invasive species. *Miconia calvescens* is their primary ground and aerial operations target. Highly specialized herbicide ballistic technology (HBT) has been applied strategically since 2012 to protect the most remote watershed areas while minimizing the footprint on the landscape.

The remote possibility of undetected *Miconia calvescens* population(s) cannot be ruled out, but we are proud of MISC's significant accomplishment to keep the species out of the West Maui Mountains Watershed. However, the fight continues on the windward side of the East Maui Mountains with core infestations in remote, lower-elevation, areas near Hana and Nahiku. Aggressive efforts are being implemented in response to control established populations and to disrupt incipient populations from moving further up the mountain. We welcome any supporting countermeasure. So, based on the promising test results against invasive melastomes in Hawai'i, we support the coordinated use of the *Euselasia chrysippe* (Lepidoptera: Riodinidae) butterfly for biological control of *Miconia calvescens*, *Clidemia hirta*, and other closely related weeds.

Should you have any questions, please call Robert De Robles at our Water Resource and Planning Division at (808) 463-3113.

Sincerely,

  
Gladys C. Baisa  
Deputy Director

*"By Water All Things Find Life"*

DAVID Y. IGE  
GOVERNOR  
STATE OF HAWAII

DOUGLAS S. CHIN  
LT. GOVERNOR  
STATE OF HAWAII



JOBIE M. K. MASAGATANI  
CHAIRMAN  
HAWAIIAN HOMES COMMISSION

WILLIAM J. AILA, JR.  
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII  
DEPARTMENT OF HAWAIIAN HOME LANDS

160 BAKER AVENUE  
HILO, HAWAII 96720

May 30, 2018

Robert Hauff, State Protection Forester  
Department of Land and Natural Resources  
Division of Forestry and Wildlife  
1151 Punchbowl Street, Room 325  
Honolulu, Hawai'i 96813

Dear Mr. Hauff:

Subject: Early Consultation on Environmental Assessment for  
the state-wide release of the butterfly *Euselasia  
chrysippe* for biological control of the noxious  
weed *Miconia calvescens*

The Department of Hawaiian Home Lands acknowledges receiving  
the request for comments on the above-cited project. After  
reviewing the materials submitted, due to its lack of proximity  
to Hawaiian Home Lands, we do not anticipate any impacts to our  
lands or beneficiaries from the project.

However, we highly encourage all agencies to consult with  
Hawaiian Homestead community associations and other (N)ative  
Hawaiian organizations when preparing environmental assessments  
in order to better assess potential impacts to cultural and  
natural resources, access and other rights of Native Hawaiians.

Mahalo for the opportunity to provide comments. If you have  
any questions, please call Rae Ann Hyatt, at 620-9480 or contact  
via email at [raeann.p.hyatt@hawaii.gov](mailto:raeann.p.hyatt@hawaii.gov).

Aloha,

M. Kaleo Manuel  
Acting Planning Program Manager

Harry Kim  
Mayor



Diane L. Ley  
Director

Ron Whitmore  
Deputy Director

**County of Hawai'i**  
**DEPARTMENT OF RESEARCH AND DEVELOPMENT**

25 Aupuni Street, Room 1301 • Hilo, Hawai'i 96720-4252  
(808) 961-8366 • Fax (808) 935-1205  
E-mail: chresdev@hawaiicounty.gov

June 22, 2018

TO: Robert D. Hauff, State Protection Forester, DLNR

FR: Diane Ley, Director, Department of Research and Development

A handwritten signature in cursive script, appearing to read "Diane Ley".

RE: Early Consultation on Environmental Assessment for the state-wide release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvenscens*

Thank you for the opportunity to provide consultation on the Environmental Assessment for the state-wide release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvenscens*.

*Miconia* is an aggressive invasive species that readily encroaches upon public and private lands contributing to the shading out of native and non-native trees and undergrowth; thus, effectively disrupting healthy forests and landscape ecosystems and ultimately exposing soils to erosion. Extensive efforts and public expense were put forth to control this tree, with little success. Today, with the outbreak of Rapid Ohia Death, it is more important than ever that Hawaii's forests are protected from aggressive species as *Miconia*.

A successful biocontrol candidate, such as *Euselasia chrysippe*, would be a welcome tool to control the further spread of *Miconia* throughout the Island of Hawaii.

C: Harry Kim, Mayor

Hawai'i County is an Equal Opportunity Provider and Employer



University of Hawai'i, Manoa  
Pacific Cooperative Studies Unit  
3190 Maile Way, St. John 410, Honolulu, Hawai'i 96822  
E-mail dduffy@hawaii.edu Ph: (808) 956-8218 Fax: (808) 956-4710

**MEMORANDUM**

TO: Dr. R. Hauff, State Protection Forester  
Hawaii Department of Land and Natural Resources

FROM: David Duffy *L signing for David Duffy*  
PCSU Unit Leader/PI c/o Botany

RE: Environment Assessment of *Euselasia chrysippe* as a biological control agent  
against *Miconia calvescens*.

OANRP encourages the release of *Euselasia chrysippe* against *Miconia calvescens*, a serious potential threat but not yet present on lands that we manage on Oahu. It has not become a serious problem for us because it has been aggressively managed by the Oahu Invasive Species Committee (OISC) who have contained it to some few sites in the Koolau range. Were funds for OISC to lapse *Miconia* would be spread rapidly by birds.

This biological control agent is not very specific within the Melastomataceae, an added benefit. It will attack almost all other established melastomes in Hawaii with the exception of *Tibouchina* for which the state has already proposed the release of another biological control agent. Its minor feeding on *Psidium cattleianum* could possibly be of benefit in the control of that species. We are particularly supportive of the release of this biocontrol agent because of its potential to damage *Clidemia hirta* which is a significant weed in many areas managed by OANRP.

OANRP does not have *Miconia calvescens* on lands that it manages. If we can assist in other way, please us know.



Mr. Robert Hauff  
Department of Land and Natural Resources  
Division of Forestry and Wildlife  
1151 Punchbowl St. Rm 325  
Honolulu, HI 96813

June 21, 2018

Dear Mr. Hauff,

The O'ahu Invasive Species Committee (OISC) supports the release of a natural enemy to control the growth and spread of miconia (*Miconia calvescens*). Biocontrol is an effective tool to reduce populations of invasive plants that have already become too widespread to eradicate or suppress with surveys, hand-pulling and herbicides.

Biocontrol will be an enormous help to management efforts on Hawai'i Island and Maui where miconia is very widespread. OISC has been controlling miconia on O'ahu since 2001 and we have been able to suppress the population enough that there were only 12 trees found over 13,000 acres surveyed in 2017. Although OISC intends to continue with its program until miconia is eradicated from O'ahu, it would be helpful to have the biocontrol released elsewhere in the state in the event we lose funding or are unable to keep up with our suppression program. We have been able to keep the number of mature trees to just 12 trees over 13,000 acres surveyed so we are optimistic that biocontrol will not be needed, however, it takes a full-time field crew using ground and helicopter surveys to achieve this. If we are not able to keep up the effort decades into the future, a miconia biocontrol will be a key component to protecting 'ōhi'a forests on O'ahu.

Miconia's large leaves allow it to flourish in dense shade intolerable to most other plants. It matures quickly and produces millions of bird-dispersed seeds. It is estimated that in 60 years, this species turned 60,000 acres of Tahitian forest into single species stands where nothing else can grow. To put that number in perspective, the Ko'olau Range watershed is approximately 100,000 acres. Once miconia takes over, understory plants cannot survive in the deep shade of its canopy and the forest floor becomes bare earth and more susceptible to erosion. Miconia is a particularly devastating invasive species and we are pleased to see that a biocontrol is finally ready for release. Mahalo for the opportunity to comment.

Regards,

Rachel Neville  
OISC Manager

743 Ulukahiki Street • Kailua, Hawaii 96734 • Ph: (808) 266-7994 Fax: (808) 266-7995  
[www.oahuisc.org](http://www.oahuisc.org)

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

June 21, 2018

State of Hawaii  
Department of Land and Natural Resources  
Division of Forestry & Wildlife  
Attention: Mr. Robert Hauff, State Protection Forester via email: [robert.d.hauff@hawaii.gov](mailto:robert.d.hauff@hawaii.gov)  
1151 Punchbowl Street, Room 325  
Honolulu, Hawaii 96813

Dear Mr. Hauff:

SUBJECT: Early Consultation on Environmental Assessment of the state-wide release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvescens*

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to Land Division's Districts for their review and comments.

At this time, enclosed are comments from the Land Division's Oahu, Maui, Hawaii and Kauai Districts on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji  
Land Administrator

Enclosure(s)  
cc: Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

10 JUN 21 AM 10:53

SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

May 25, 2018

MEMORANDUM

FROM  
TO:

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – OLDO/HDLO/MDLO/KDLO
- Historic Preservation

TO

~~FROM:~~ Russell Y. Tsuji, Land Administrator  
 SUBJECT: Early Consultation on Environmental Assessment of the state-wide release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvescens*

LOCATION: State-wide  
 APPLICANT: Department of Land and Natural Resources, Division of Forestry and Wildlife

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments by **June 22, 2018**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Print Name:

Date:

Wesley T. Matsunaga  
 6/7/18

Attachments  
cc: Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

May 25, 2018

MEMORANDUM

2018 MAY 31 A 10:44  
RECEIVED  
LAND DIVISION  
HILO, HAWAII

2018 JUN -8 AM 10:57  
RECEIVED  
LAND DIVISION  
DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

FROM:  
TO:

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division - OLDO/HDLO/MDLO/KDLO
- Historic Preservation

TO:

FROM: Russell Y. Tsuji, Land Administrator  
 SUBJECT: Early Consultation on Environmental Assessment of the state-wide release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvescens*  
 LOCATION: State-wide  
 APPLICANT: Department of Land and Natural Resources, Division of Forestry and Wildlife

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments by **June 22, 2018.**

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: \_\_\_\_\_

Print Name: GORDON C. HETT

Date: 6/5/18

Attachments  
cc: Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

May 25, 2018

MEMORANDUM

TO: **DLNR Agencies:**  
 Div. of Aquatic Resources  
 Div. of Boating & Ocean Recreation  
 Engineering Division  
 Div. of Forestry & Wildlife  
 Div. of State Parks  
 Commission on Water Resource Management  
 Office of Conservation & Coastal Lands  
 Land Division – OLDO/HDLO/MDLO/KDLO  
 Historic Preservation

RECEIVED  
LAND DIVISION  
2018 JUN 15 AM 11:25  
DEPT OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

FROM: Russell Y. Tsuji, Land Administrator  
SUBJECT: Early Consultation on Environmental Assessment of the state-wide release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvescens*  
LOCATION: State-wide  
APPLICANT: Department of Land and Natural Resources, Division of Forestry and Wildlife

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments by **June 22, 2018**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

RECEIVED MAY 31 2018

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*

Print Name: Daniel Orullas

Date: 6/6/18

*10/25/18*

Attachments  
cc: Central Files

*sm 6/1/18*

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

May 25, 2018

MEMORANDUM

2018 JUN -4 PM 1:44  
RECEIVED  
LAND DIVISION  
DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

TO: **DLNR Agencies:**  
 Div. of Aquatic Resources  
 Div. of Boating & Ocean Recreation  
 Engineering Division  
 Div. of Forestry & Wildlife  
 Div. of State Parks  
 Commission on Water Resource Management  
 Office of Conservation & Coastal Lands  
 Land Division – OLDO/HDLO/MDLO/KDLO  
 Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator  
SUBJECT: Early Consultation on Environmental Assessment of the state-wide release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvescens*  
LOCATION: State-wide  
APPLICANT: Department of Land and Natural Resources, Division of Forestry and Wildlife

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments by **June 22, 2018**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: Darlene Bryant-Takamatsu  
Print Name: Darlene Bryant-Takamatsu  
Date: 6/4/18

Attachments  
cc: Central Files

R. Fenstemacher PhD  
1386 Manu Mele Street  
Kailua, Hawaii 96734  
(808) 235-1813  
hale underscore noa at yahoo dot com  
21 June 2018

Mr. Hauff  
State Protection Forester  
Department of Land and Natural Resources  
1151 Punchbowl Street, Room 325  
Honolulu, Hawaii 96813

Dear Mr. Hauff:

I have been hiking in Hawaii for a long time. The beauty and scientific wonder of Hawaii's unique native forests and the endemic flora they contain have captivated my imagination since the very start.

While out in the forest, I have seen with my own eyes how both miconia and wililaiki live up to their reputation as truly terrible weeds that significantly damage the forest. With time, these weeds invade and take over large areas of previously intact native forest, almost exclusively as a monoculture, and choke out large swaths of the native plants that were growing there. These disastrous growth habits severely degrade unique natural habitat, which results in severely negative consequences to our watersheds and the native flora. Highly invasive weeds like these are an existential threat to Hawaii's unique native forests.

Because neither miconia nor wililaiki appear to have any substantially redeeming benefits enough to counterbalance an overwhelming tendency to do harm, I support the planned release of biocontrol agents that specifically target miconia and wililaiki. The environmental impact of successfully controlling highly invasive weeds like these, which pose an existential threat to Hawaii's unique flora, would be to encourage native forest recovery and enhancement of our island watersheds.

Mahalo for this opportunity to comment. Please keep me in the loop.

Me ke aloha,



R. Fenstemacher

Robert Hauff, State Protection Forester  
Department of Land and Natural Resources  
Kalanimoku Building, room 325, 1151 Punchbowl Street  
Honolulu, Hawaii 96813

18 June 2018

**RE:** Early Consultation on Environmental Assessment for *Pseudophilothrips Ichini* and *Euselasia chrysippe* for biological control of the noxious weeds *Schinus terebinthifolia* and *Miconia calvescens*, respectively.

Dear Sir:

Aloha. The Hawaii Botanical Society would like to express support of biocontrol efforts for the invasive weeds, miconia (*Miconia calvescens*) and wililaiki (*Schinus terebinthifolia*).

Wililaiki overpowers mesic habitat and chokes out native plants that should grow there. It expands as a monoculture to impoverish one of Hawaii's most threatened and unique ecosystems. Release of targeted biocontrol agents specific to wililaiki should aid recovery of these vanishing native mesic forests, recovery of the associated unique biota from those areas, and enhance the watershed.

Likewise, biocontrol of miconia (*Miconia calvescens*) should also be very positive. Miconia has a track record of invading native wet forests as a monoculture, which degrades that ecosystem, too. Release of targeted biocontrol agents specific to miconia should aid recovery of these native forests and enhance this ecosystem's vital watershed function.

In summary, both of these species are noxious, invasive weeds, and releasing biocontrol specific for them would be good for Hawaii's forests and watershed.

Me ke aloha,



Rebecca Barone, President  
Hawaii Botanical Society  
c/o UH Botany  
3190 Maile way  
Honolulu, HI 96822

DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 7<sup>TH</sup> FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 768-8000 • FAX: (808) 768-8041  
DEPT. WEB SITE: [www.honolulu.gov](http://www.honolulu.gov) • CITY WEB SITE: [www.honolulu.gov](http://www.honolulu.gov)

KIRK CALDWELL  
MAYOR



KATHY K. SOKUGAWA  
ACTING DIRECTOR

TIMOTHY F. T. HIU  
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI  
DEPUTY DIRECTOR

June 14, 2018

2018/ELOG-1065(rns4)  
1602440

Mr. Robert Hauff  
State Protection Forester  
Division of Forestry and Wildlife  
State of Hawaii  
Department of Land and Natural Resources  
1151 Punchbowl Street, Room 325  
Honolulu, Hawaii 96813

Dear Mr. Hauff:

SUBJECT: State-wide Release of the Butterfly *Euselasia chrysippe* for  
Biological Control of the Noxious weed *Miconia calvescens*

We have reviewed your May 23, 2018 request for comments on proposed release of the butterfly *Euselasia chrysippe* for biological control of the noxious weed *Miconia calvescens*. The purpose of the release is to protect the "highly diverse native wet forest ecosystems."

We rely on the experts of the State Department of Land and Natural Resources to evaluate the ecological impacts of invasive species and the appropriate methods of controlling those invasive species, as informed by the best local, national, and international science.

Protection of Oahu's native wet forest ecosystems is consistent with City policies in the Oahu General Plan, the eight Development Plans and Sustainable Communities Plans, and the Oahu Watershed Management Plan. These Plans call for protection of natural resources, support of watershed infiltration and aquifer recharge, and reduction of sedimentation and toxic pollution of streams and coastal water caused by excessive storm water flows, all which will be supported by control of invasive species like *Miconia calvescens*.

Thank you for the opportunity to provide comments on this matter. Should you have any questions, please contact Lisa Imata of our staff at 768-8041.

Very truly yours,

A handwritten signature in black ink that reads "Eugene H. Takahashi".

Eugene H. Takahashi  
Deputy Director

EHT:bkg

**APPENDIX B: CULTURAL IMPACT ASSESSMENT FOR THE PROPOSED STATEWIDE RELEASE OF A BUTTERFLY (*EUSELASIA CHRYSIPPE*) AS BIOCONTROL FOR MICONIA (*MICONIA CALVESCENS*)**

# A Cultural Impact Assessment for the Proposed Statewide Release of a Butterfly (*Euselasia chrysippe*) as Biocontrol for Miconia (*Miconia calvescens*)

State of Hawai‘i

FINAL



*Prepared By:*  
Lokelani Brandt, M.A.

*Prepared For:*

Division of Forestry and  
Wildlife, Department of Land  
and Natural Resources  
1151 Punchbowl Street, #325  
Honolulu, HI 96813

October 2019



Archaeology • History • Anthropology • Architectural History

Hilo Office: (808) 969-6066 Fax: (808) 443-0065  
507-A E. Lanikaula Street, Hilo, HI 96720

Honolulu Office: (808) 439-8089 Fax: (808) 439-8087  
820 Mililani Street, Suite 700, Honolulu, HI 96813

**A Cultural Impact Assessment for the  
Proposed Statewide Release of a Butterfly  
(*Euselasia chrysippe*) as Biocontrol for Miconia  
(*Miconia calvescens*)**

State of Hawai‘i



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# 1. INTRODUCTION

At the request of the Department of Land and Natural Resources (DLNR), Division of Forestry and Wildlife (DOFAW) and Hawai'i Department of Agriculture (HDOA), referred to hereafter as the State of Hawai'i, ASM Affiliates (ASM) has prepared this Cultural Impact Assessment (CIA) for the proposed statewide release of a butterfly (*Euselasia chrysippe*) as a biocontrol agent targeting *Miconia calvescens* (*Miconia*), a noxious fast-growing tree in the melastome family (Melastomataceae). Native to Central and South America, *Miconia* was introduced to the island of O'ahu in 1961 as an ornamental plant and has become a major threat to Hawai'i's wet forest ecosystems (Medeiros et al. 1997). In 1991, the first efforts to control the spread of *Miconia* were initiated on Maui and in 1992, under Hawai'i Administrative Rules, Chapter 68, it was officially listed as a noxious weed in the State of Hawai'i (ibid.). In the State of Hawai'i the term "invasive species" is any "alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health" (Invasive Species Advisory Committee 2006:1). By 1996, management programs to eradicate known populations and to control the spread of *Miconia* were initiated on the islands of Kaua'i, O'ahu, and Hawai'i (Leary et al. 2013). While removal and containment through applied herbicides and mechanical action have been the primary means of control, the increased operational cost associated with the spread of *Miconia* into more remote regions compounded by averse policy has shifted management strategies (Leary et al. 2013; Medeiros et al. 1997). To enhance Hawai'i's *Miconia* management efforts, DOFAW is proposing to release a natural enemy, a small butterfly *E. chrysippe*.

The current CIA is intended to inform an Environmental Assessment (EA) conducted in compliance with Hawai'i Revised Statutes (HRS) Chapter 343. This CIA was prepared in adherence with the Office of Environmental Quality Control (OEQC) *Guidelines for Assessing Cultural Impact*, adopted by the Environmental Council, State of Hawai'i, on November 19, 1997. As stated in Act 50, which was proposed and passed as Hawai'i State House of Representatives Bill No. 2895 and signed into law by the Governor on April 26, 2000, "environmental assessments . . . should identify and address effects on Hawaii's culture, and traditional and customary rights . . . native Hawaiian culture plays a vital role in preserving and advancing the unique quality of life and the 'aloha spirit' in Hawai'i. Articles IX and XII of the state constitution, other state laws, and the courts of the State impose on governmental agencies a duty to promote and protect cultural beliefs, practices, and resources of native Hawaiians as well as other ethnic groups."

The primary focus of this report is on understanding the cultural and historical context of *Miconia* with respect to Hawai'i's host culture. This CIA is divided into four main sections, beginning with an introduction of the proposed action followed by a physical description of *Miconia* and the proposed biocontrol agent *E. chrysippe*. Part two of this report provides a cultural-historical context of the settlement of the Hawaiian Islands by early Polynesian settlers and the transformation of their beliefs and practices associated with the land following Western contact. An overview of the history of biocontrol in Hawai'i is also provided, and this section concludes with a detailed discussion of the introduction of *Miconia* to the South Pacific and into the Hawaiian Islands; all of which combine to provide a geographical and cultural context in which to assess the proposed action. The results from the consultation process are then presented, along with a discussion of potential impacts as well as appropriate actions and strategies to mitigate any such impacts.

## PROPOSED ACTION

DOFAW has been working cooperatively with HDOA and the United States Forest Service (USFS) to control the harmful impacts of certain widespread invasive plant or pest species through the use of biological control (also referred to as biocontrol). Classical biocontrol is the strategy of using an invasive species' natural enemies from its native range to reduce the impacts of the invasive species. Biocontrol projects typically require years of research and survey work to find potential candidates that are subjected to a host of tests. Only those candidates that are host-specific, meaning they can only complete their life cycle on their intended invasive species host and shown to only negatively impact the growth and abundance of the target invasive species are considered for release. Once testing has been successfully completed, agencies must comply with national and state regulatory requirements for the release of the biocontrol agent. As such, the proposed action involves the use of state lands and funds, which necessitates compliance with Hawai'i Revised Statutes (HRS) Chapter 343, also known as the Hawai'i Environmental Policy Act (HEPA). The proposing agencies are conducting an Environmental Assessment (EA) of the proposed action to evaluate potential environmental impacts and this CIA is an essential component of the EA to ensure compliance with HRS Chapter 343.

## ***MICONIA CALVESCENS* AND THE PROPOSED BIOLOGICAL CONTROL AGENT**

Native to the montane forests of Central and South America, *Miconia calvescens* (Melastomataceae) is a mid-story tree that measures 12 to 15 meters tall (Figure 1) (Leary et al. 2013). This tree has strongly trinerved, oblong-shaped leaves that can reach lengths of 80 centimeters (ibid.) (Figure 2). The species present in Hawai'i, French Polynesia, southern Mexico, and Costa Rica are of a bicolor form with a purple leaf underside and green left topside (see Figure 2) (Medeiros et al. 1997). This attractive characteristic has made it favorable amongst plant collectors and horticulturalists who value the plant's vibrant colors and velvety texture (Leary et al. 2013). Flowers and fruits of the *Miconia* plant grow on stalks and in clusters and the inflorescence can vary in color from white to pink (Figure 3). *Miconia* can flower/fruit between two to three times per year and in moist conditions, it grows rapidly and can reach maturity within four to five years and produces millions of propagules in a single reproductive cycle (ibid.). This tree produces small purple-colored edible fruits that measure approximately 5.9 millimeters in diameter that are dispersed, in a natural setting by both frugivorous bird populations and natural dispersal such as gravity and water (Figure 4). Seeds can also be spread by human when seed filled soil adheres to shoes, clothing, equipment or vehicles. Each fruit is packed with anywhere from 50-200 minuscule seeds with each fruit measuring about 0.5 millimeters in diameter, which unceasingly accumulates in the soil and can remain viable for more than sixteen years (ibid.). Once sunlight penetrates the soil, dormant *Miconia* seeds can quickly germinate. Germination of dormant seeds is exacerbated when herbicidal or natural (i.e. high winds or hurricanes) defoliation occurs allowing more sunlight to permeate the forest floor. Areas containing high densities of *Miconia* are known to shade out the understory vegetation and is presumed to promote surface soil erosion in steep terrains (ibid.).

To supplement existing biological control efforts, DOFAW and the United State Forest Service (USFS) is proposing a statewide release of *Euselasia chrysippe* (Lepidoptera: Riodinidae), a small golden colored butterfly native to Costa Rica whose caterpillars feed externally on leaves of several species of *Miconia*. Larvae hatch from large egg masses and continue to molt and move in unison to feeding sites, helping to optimize foraging and deter enemies. *E. chrysippe* has been evaluated as a potential biological control agent for *Miconia calvescens* through research in its native Costa Rica as well as in containment facilities in Hawai'i. Tests have been conducted on a variety of native and non-native plants to identify the butterfly larvae's potential host range. Results indicate that it does not have the capacity to impact native or economic plants in Hawai'i, and its host range is limited to *M. calvescens* and closely related weeds within the melastome family. Melastomes in Hawai'i includes *Miconia*, *Clidemia* (*Clidemia hirta*) and other invasive alien species, but no native plants.



Figure 1. Tall stands of *Miconia* growing along the Onomea scenic route in South Hilo, Hawai'i.



Figure 2. Trinerved and bicolor leaves of *Miconia*.



Figure 3. White inflorescence growing on stalks at the top of a *Miconia* plant.



Figure 4. Mature dark purple fruits on the pink stalks of a *Miconia* plant.

## 2. BACKGROUND

The following section contains a cultural-historical context of the settlement of the Hawaiian Islands by early Polynesian settlers and the transformation of their beliefs and practices associated with the land following western contact. An overview of the history of biocontrol in Hawai‘i is also provided and this section concludes with a detailed discussion of the introduction of *Miconia* to the Hawaiian Islands and its impacts to Hawai‘i’s wet forests.

### GEOGRAPHICAL AND CULTURAL CONTEXT OF HAWAI‘I

The Hawaiian Islands are located within the vast and remote Pacific Ocean, situated more than 3,200 kilometers (2,000 miles) from the nearest continent (Juvik and Juvik 1998). The 16,640 square kilometers (6,425 square miles) of land consists of eight main large volcanic islands, Hawai‘i, Maui, Kaho‘olawe, Lāna‘i, Moloka‘i, O‘ahu, Kaua‘i, and Ni‘ihau and 124 smaller islands, reefs, and shoals (ibid.) (Figures 5 and 6). Due to its geographical placement in the middle of the vast Pacific Ocean, coupled with its diverse climatic conditions, the Hawaiian Islands boasts the highest levels of endemism in both native plants and animals, with over 10,000 species found nowhere else in the world (Cannarella 2010).

While the question of the timing of the first settlement of Hawai‘i by Polynesians remains unanswered, several theories have been offered that derive from various sources of information (i.e., archaeological, genealogical, mythological, oral-historical, radiometric). However, none of these theories are today universally accepted. What is more widely accepted is the answer to the question of where Hawaiian populations came from and the transformations they went through on their way to establish a uniquely Hawaiian culture. More recently, with advances in palynology and radiocarbon dating techniques, Kirch (2011) and others (Athens et al. 2014; Wilmshurst et al. 2011) have convincingly argued that Polynesians arrived in the Hawaiian Islands, sometime between A.D. 1000 and A.D. 1200 and expanded rapidly thereafter (c.f., Kirch 2011). The initial migration to Hawai‘i is believed to have occurred from Kahiki (the ancestral homelands of Hawaiian gods and people) with long distance voyages occurring fairly regularly through at least the 13<sup>th</sup> century. It has been generally reported that the sources of the early Hawaiian populations originated from the southern Marquesas Islands (Emory in Tatar 1982). In these early times, Hawai‘i’s inhabitants were primarily engaged in subsistence-level agriculture and fishing (Handy and Handy 1991). This was a period of great exploitation and environmental modification when early Hawaiian farmers developed new subsistence strategies by adapting their familiar patterns and traditional tools to their new environment (Kirch 1985; Pogue 1978). According to Fornander (1969), the Hawaiians brought from their homeland certain Polynesian customs and belief: the major gods Kāne, Kū, Lono, and Kanaloa; the *kapu* system of law and order; the *pu‘uhonua* (places of refuge), the *‘aumakua* concept, and the concept of *mana*.

For generations following initial settlement, communities were clustered along the watered, windward (*Ko‘olau*) shores of the Hawaiian Islands. Along the *ko‘olau* shores, streams flowed and rainfall was abundant, and agricultural production became established. The *ko‘olau* region also offered sheltered bays from which deep-sea fisheries could be easily accessed, and nearshore fisheries, enriched by nutrients carried in the fresh water, could be maintained in fishponds and coastal waters. It was around these bays that clusters of houses where families lived could be found (McEldowney 1979). In these early times, Hawai‘i’s inhabitants were primarily engaged in subsistence-level agriculture and fishing (Handy and Handy 1972). Following the initial settlement period, areas with the richest natural resources became populated and perhaps crowded, and by about A.D. 1200, the population began expanding to the Kona (leeward side) and more remote regions of the island (Cordy 2000).

As the population continued to expand so did social stratification, which was accompanied by major socioeconomic changes and intensive land modification. Most of the ecologically favorable zones of the windward and coastal regions of all major islands were settled and the more marginal leeward areas were being developed. During this expansion period, additional migrations to Hawai‘i occurred from Tahiti in the Society Islands. Rosendahl (1972) has proposed that settlement at this time was related to the seasonal, recurrent occupation in which coastal sites were occupied in the summer to exploit marine resources, and upland sites were occupied during the winter months, with a focus on agriculture. An increasing reliance on agricultural products may have caused a shift in social networks as well; as Hommon (1976) argues, kinship links between coastal settlements disintegrated as those links within the *mauka-makai* settlements expanded to accommodate the exchange of agricultural products for marine resources. This shift is believed to have resulted in the establishment of the *ahupua‘a* system sometime during the A.D. 1400s (Kirch 1985), which added another component to an already well-stratified society. The implications of this model include a shift in residential patterns from seasonal, temporary occupation, to the permanent dispersed occupation of both coastal and upland areas.

2. Background

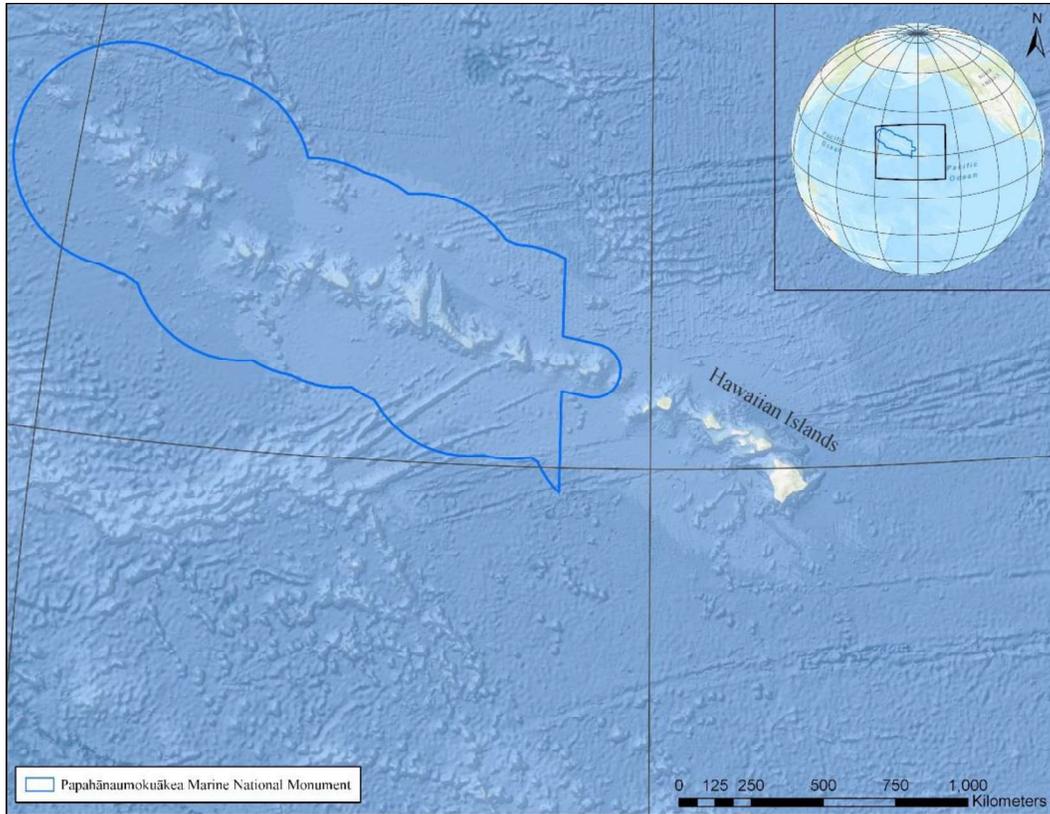


Figure 5. Map of the Hawaiian archipelago.

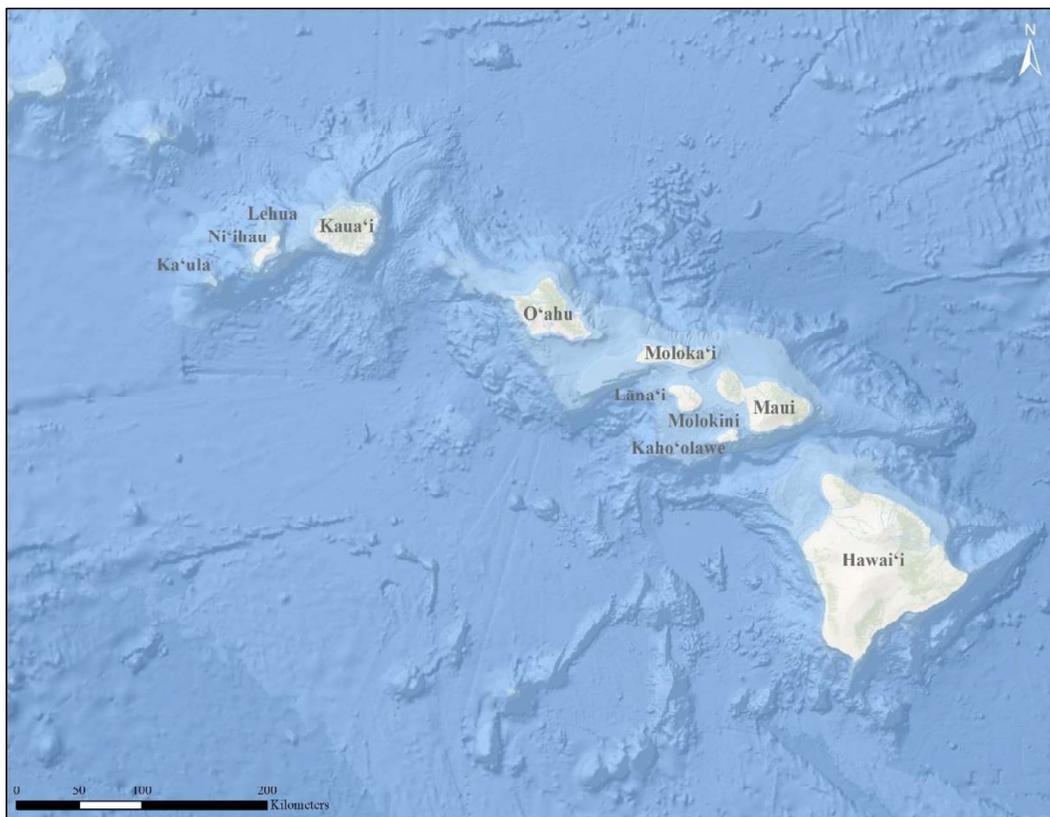


Figure 6. Map of the main Hawaiian Islands

Adding to an already highly-complex society was the development of the traditional land division system, which included the *ahupua'a*—the principle land division that functioned for both taxation purposes and furnished its residents with nearly all of the fundamental necessities. *Ahupua'a* are land divisions that typically incorporated all of the eco-zones from the mountains to the sea and for several hundred yards beyond the shore, assuring a diverse subsistence resource base (Hommon 1986). Although the *ahupua'a* land division typically incorporated all of the eco-zones, their size, shape, and resource base varied greatly (Cannelora 1974). In summarizing the types of ecozones that could be found in a given *ahupua'a*, Hawaiian scholar and historian, Samuel Kamakau writes:

Here are some names for [the zones of] the mountains—the *mauna* or *kuahiwi*. A mountain is called a *kuahiwi*, but *mauna* is the overall term for the whole mountain, and there are many names applied to one, according to its delineations ('*ano*). The part directly in back and in front of the summit proper is called the *kuamauna*, mountaintop; below the *kuamauna* is the *kuahea*, and makai of the *kuahea* is the *kuahiwi* proper. This is where small trees begin to grow; it is the *wao nahele*. Makai of this region the trees are tall, and this is the *wao lipo*. Makai of the *wao lipo* is the *wao 'eiwa*, and makai of that the *wao ma'ukele*. Makai of the *wao ma'ukele* is the *wao akua*, and makai of there is the *wao kanaka*, the area that people cultivate. Makai of the *wao kanaka* is the '*ama'u*, fern belt, and makai of the '*ama'u* the '*apa'a*, grasslands.

A solitary group of trees is a *moku la'au* (a “stand” of trees) or an *ulu la'au*, grove. Thickets that extend to the *kuahiwi* are *ulunahale*, wild growth. An area where *koa* trees suitable for canoes (*koa wa'a*) grow is a *wao koa* and mauka of there is a *wao la'au*, timber land. These are dry forest growths from the '*apa'a* up to the *kuahiwi*. The places that are “spongy” (*naele*) are found in the *wao ma'ukele*, the wet forest.

Makai of the '*apa'a* are the *pahe'e* [*pili* grass] and '*ilima* growths and makai of them the *kula*, open country, and the '*apoho* hollows near to the habitations of men. Then comes the *kahakai*, coast, the *kahaone*, sandy beach, and the *kalawa*, the curve of the seashore—right down to the '*ae kai*, the water's edge.

That is the way *ka po'e kahiko* [the ancient people] named the land from mountain peak to sea. (Kamakau 1976:8–9)

The *hoa'āina* (native tenants) and '*ohana* (families) who lived on the land had rights to the gather resources for subsistence and for tribute (Jokiel et al. 2011). As part of these rights, the *ahupua'a* residents were also required to supply resources and labor that supported the royal community of regional and/or island kingdoms. The *ahupua'a* became the equivalent of a local community, with its own social, economic, and political significance and served as the taxable land division during the annual *Makahiki* procession (Kelly 1956). During this annual procession, the highest chief of the land sent select members of his retinue to collect *ho'okupu* (tribute and offerings) in the form of goods from each *ahupua'a*. The *hoa'āina* (native tenants) who resided in the *ahupua'a* brought their share of *ho'okupu* to an *ahu* (altar) that was symbolically marked with the image of a *pua'a* (pig). *Ahupua'a* were ruled by *ali'i 'ai ahupua'a* or chiefs who controlled the *ahupua'a* resources; who, for the most part, had complete autonomy over this generally economically self-supporting piece of land (Malo 1951). *Ahupua'a* residents were not bound to the land nor were they considered the property of the *ali'i*. If the living conditions under a particular *ahupua'a* chief were deemed unsuitable, the residents could move freely in pursuit of more favorable conditions (Lam 1985). This structure safeguarded the well-being of the people and the overall productivity of the land, lest the chief loses the principle support and loyalty of his or her supporters. *Ahupua'a* lands were in turn, managed by an appointed *konohiki* or lesser chief-landlord, who oversaw and coordinated stewardship of an area's natural resources (ibid.). In some places, the *po'o lawai'a* (head fisherman) held the same responsibilities as the *konohiki* (Jokiel et al. 2011). When necessary, the *konohiki* took the liberty of implementing *kapu* (restrictions and prohibitions) to protect the *mana* of the area's resources from physical and spiritual depletion.

Many *ahupua'a* were further divided into smaller land units termed '*ili* and '*ili kūpono* (often shortened to '*ili kū*). '*Ili* were created for the convenience of the *ahupua'a* chief and served as the basic land unit to which the *hoa'āina*, retained for often long periods of time (Jokiel et al. 2011; MacKenzie 2015). As the '*ili* themselves were typically passed down in families, so too were the *kuleana* (responsibilities, privileges) that were associated with it. The right to use and cultivate '*ili* was maintained within the '*ohana*, regardless of any change in title of the *ahupua'a* chief (Handy and Handy 1991). Malo (1951), recorded several types of '*ili*: the '*ili pa'a*, a single intact parcel and the '*ili lele*, a discontinuous parcel dispersed across an area. Whether dispersed or wholly intact, the '*ili* land division required a cross section of available resources, and for the *hoa'āina*, this generally included access to agriculturally fertile lands and coastal fisheries. While much of the same resource principles applied to the '*ili kūpono*, these land units were

politically independent of the *ahupua'a* chief. This designation was applied to specific areas containing resources that were highly valued by the ruling chiefs, such as fishponds (Handy and Handy 1991).

The *ali'i* who presided over the *ahupua'a* (*ali'i-ai-ahupua'a*), in turn, answered to an *ali'i ai moku* (chief who claimed the abundance of the entire *moku* or district) (Malo 1951). Although *moku* (districts) were comprised of multiple *ahupua'a*, they were considered geographical subdivisions with no explicit reference to rights in the land (Cannelora 1974). This form of district subdividing was integral to Hawaiian life and was the product of resource management planning that was strictly adhered to. As knowledge of place developed over the centuries and passed down intergenerationally by direct teaching and experience, detailed information of an area's natural cycles and resources were retained and well-understood. Decisions were based on generations worth of highly informed knowledge and sustainably adapted to meet the needs of a growing population. This highly-complex land management system mirrors the unique Hawaiian culture that coevolved with these islands.

### Evolution of Hawaiian Land Stewardship Practices and the Impacts on Hawai'i's Native Forests

Their ancient and ingrained philosophy of life tied them to their environment and helped to maintain both natural, spiritual, and social order. In describing the intimate relationship that exists between Hawaiians and *'āina* (land), Hawaiian historian and cultural specialist, Kepā Maly writes:

In the Hawaiian context, these values—the “sense of place”—have developed over hundreds of generations of evolving “cultural attachment” to the natural, physical, and spiritual environments. In any culturally sensitive discussion on land use in Hawai'i, one must understand that Hawaiian culture evolved in close partnership with its' natural environment. Thus, Hawaiian culture does not have a clear dividing line of where culture and nature begins.

In a traditional Hawaiian context, nature and culture are one in the same, there is no division between the two. The wealth and limitations of the land and ocean resources gave birth to, and shaped the Hawaiian world view. The *'āina* (land), *wai* (water), *kai* (ocean), and *lewa* (sky) were the foundation of life and the source of the spiritual relationship between people and their environs. (Maly 2001)

The Hawaiian *'ōlelo no'eau* (proverbial saying) “*Hānau ka 'āina, hānau ke ali'i, hānau ke kanaka*” (Born was the land, born were the chiefs, born were the commoners), conveys the belief that all things of the land including *kanaka* (humans) were literally born (*hānau*), and are thus connected through kinship links that extend beyond the immediate family (Pukui 1983:57). *'Āina* or land, was perhaps most revered, as another *'ōlelo no'eau* notes, “*He ali'i ka 'āina; he kauwā ke kanaka,*” which has been translated by Pukui (1983:62) as “The land is a chief; man is its servant.” The lifeways of early Hawaiians, which were derived entirely from the finite natural resources of these islands, necessitated the development of sustainable resource management practices. Over time, what developed was an adaptable management system that integrated the watershed, freshwater, nearshore fisheries, all of which are connected through the many unique ecosystems that extend from the mountains to the sea (Jokiel et al. 2011).

*Kilo* or astute observation of the natural world became one of the most fundamental stewardship tools used by the ancient Hawaiians. The vast knowledge acquired through the practice of *kilo* enabled them to observe and record the subtlest changes, distinctions, and correlations in their natural world. Examples of their keen observations are evident in Hawaiian nomenclature, where numerous types of rains, clouds, winds, stones, environments, flora, and fauna, many of which are geographically unique, have been named and recorded in centuries-old traditions such as *oli* (chants), *mele* (songs), *pule* (prayers), *inoa 'āina* (place names), *'ōlelo no'eau* (proverbial sayings), all of which were transmitted orally through the ages. Other traditional Hawaiian arts and practices including, (but not limited to) *hula* (traditional dance), *lapa'au* (traditional healing), *lawai'a* (fishing), *mahi'ai* (farming) further reinforced knowledge of and connection to the natural environment.

Their exclusive dependency on a thriving natural environment led Hawaiians to develop a sophisticated and comprehensive system of land stewardship that was reinforced through the strict adherence to practices that maintained and enhanced the *kapu* and *mana* of all things in the Hawaiian world. In Hawaiian belief, all things natural, places, and even people, especially those of high rank, possesses a certain degree of *mana* or “divine power” (Pukui et al. 1972; Pukui and Elbert 1986:235). *Mana* is believed to be derived from the plethora of Hawaiian gods (*kini akua*) who were embodied in elemental forces and natural resources, such as the land, mountains, plants, animals, water and certain material objects and persons (Crabbe et al. 2017). Buck (1993) expanded on this concept noting that *mana* was associated with “the well-being of a community, in human knowledge and skills (canoe building, harvesting) and in nature (crop fertility, weather, etc.)” (in Else 2004:244). Hawaiian cultural practitioner and conservation biologist, Sam Gon III adds that this belief “imposes familial responsibilities on people, and engenders respect and care for native plants and animals” (Gon III 2010:1–2).

To ensure the *mana* of the resources, certain places, and people remained protected from over-exploitation and defilement, *kapu* of various kinds were implemented and strictly enforced. According to Elbert and Pukui (1986:132) *kapu* are defined as “taboo, prohibitions; special privilege or exemption...” Kepelino (1932) notes that *kapu* associated with the gods applied to all social classes, while the *kapu* associated with the chiefs were applied to the people. As the laws of *kapu* dictated social relationships, it also provided “environmental rules and controls that were essential for a subsistence economy” (Else 2004:246). Juxtaposed to the concept of *kapu* was *noa*, translated as “freed of taboo, released from restrictions, profane, freedom” (Pukui and Elbert 1986:268). Some *kapu*, particularly those associated with maintaining social hierarchy and gender differentiation were unremitting, while those *kapu* placed on natural resources were applied and enforced according to seasonal changes. The application of *kapu* to natural resources ensured that such were resources remained unspoiled and available for future use. When the *ali‘i* or the lesser chiefs (including *konohiki* and *po‘o lawai‘a*) determined that a particular resource was to be made available to the people, a decree was proclaimed indicating that *kapu* had been lifted, thereby making it *noa*. Although transitioning a resource from a state of *kapu* to *noa* allowed for its use, people were still expected to practice sustainable harvesting methods and pay tribute to the ruling chief and the gods and goddesses associated with that resource. *Kapu* were strictly enforced and violators faced serious consequences including death (Jokiel et al. 2011). Violators who managed to escape death sought refuge at a *pu‘uhonua*, a designated place of refuge or sometimes were freed by the word of certain chiefs (Kamakau 1992). After completing the proper rituals, the violator was absolved of his or her crime and allowed to reintegrate back into society.

This ancient and ingrained way of life underwent serious transformations following the arrival of Captain James Cook in 1778. This year marks the end of what is often referred to as Hawai‘i’s Precontact Period and the beginning of the Historic Period. While this time mark signifies an important date in Hawaiian history, it is vital to note that throughout the early Historic Period, even with Western influences, the Hawaiian chiefs still held outright rule over the land and its resources and maintained strict adherence to the *kapu* system—the very system from which their power was derived. For many Hawaiian historians, the abrogation of the *kapu* system in 1819, also marked significant socio-religious changes. Some scholars have argued that the abolishment of the *kapu* system undermined the very foundation upon which traditional Hawaiian society was built, ultimately altering the relationship between the chiefs and the people as well as their relationship to the land (Else 2004; Kame‘eleihiwa 1992). At the outset of the Historic Period, there was a continued trend toward craft and status specialization, intensification of agriculture, *ali‘i* controlled aquaculture, the establishment of upland residential sites, and the enhancement of traditional oral history. The veneration of traditional gods and the strict observation of the *kapu* system were at their peaks (Kent 1983; Kirch 1985). With the influx of foreigners, many of whom were quick to introduce the idea of trade for profit, Hawai‘i’s traditional culture, and the socio-political economy began to shift to meet the growing demands of the foreign populations.

### **The Arrival of Foreign Plants and Animals and the Transformation of the *Kapu* System**

By the time Kamehameha had conquered O‘ahu, Maui, and Moloka‘i, in 1795, Hawai‘i saw the beginnings of a market system economy and the work of the native tenants shifted from subsistence agriculture to the production of foods and goods that could be traded with early explorers and whalers (Kent 1983). Introduced fruit trees and garden vegetables, often grown for trade with Westerners included yams, coffee, melons, Irish potatoes, Indian corn, beans, figs, oranges, guavas, and grapes (Wilkes 1845). Animals such as goats, sheep, pigs, cattle, horses, and turkeys that were left by Cook and other early visitors between 1778 and 1803 were allowed to roam freely (Kuykendall 1938). Of all the foreign introductions, cattle had the most profound impact. Setting the foundations of Hawai‘i’s livestock industry, in 1793, Captain George Vancouver, who had visited the islands during Cook’s 1778 voyage, gifted the first cattle to Kamehameha. The lack of quality cattle feed proved to be detrimental to the animals. To combat this, Kamehameha, at the demand of Captain George Vancouver, enforced a *kapu*, which lasted until the 1830s that prohibited the killing of the animals (Bergin 2004; Kuykendall 1938). The first head of steer and sheep that were gifted by Vancouver were driven into the upland plains of Waimea on Hawai‘i Island and allowed to roam and multiply (Barrera 1983). The unrestrained populations of cattle had increased significantly and by the 1830s had become a nuisance to native farmers. Additionally, the environmental degradation of the native forests had become apparent to Kamehameha’s sons and heirs who began to take steps to control the ravenous cattle population. In an effort to protect their crops, and to reduce the risk of encountering the large and often dangerous animals, native farmers began constructing taller enclosures to prevent the animals from plundering their gardens and destroying their homes. On Hawai‘i Island, where cattle populations are said to have numbered in the tens of thousands, tall rock walls that stretched for miles were built around the more densely populated areas (Bergin 2004). While the introduced plants and animals contributed to the development of Hawai‘i’s early market economy, the exportation of native hardwoods, particularly *‘iliahi* or sandalwood compounded the preexisting environmental degradation and wreaked havoc on the native lifeways.

The *'iliahi* or sandalwood (*Santalum ellipticum*) trade established by Euro-Americans in 1790 quickly turned into a viable commercial enterprise (Oliver 1961). By 1810, and with the backing of Kamehameha and other chiefs, this industry flourished, as farmers and fishermen were ordered into the mountains of their district to cut sandalwood and carry it to the coast. Although the laborers were compensated with *kapu* (material), food and fish (Kamakau 1992), the neglect of their personal subsistent duties lead to food shortages and famine. The harsh working conditions coupled with lack of nutrition severely degraded the health and *mana* of the native people, ultimately contributing to a population decline. This industry also began to erode the relationship between the *ali'i* and the common people (Else 2004). Kamakau (ibid.:204) described the collapse of a traditional subsistence system and the industry's detrimental effects on the people: "...this rush of labor to the mountains brought about a scarcity of cultivated food . . . The people were forced to eat herbs and tree ferns, thus the famine [was] called Hi-laulele, Haha-pilau, Laulele, Pualele, 'Ama'u, or Hapu'u, from the wild plants resorted to." Once Kamehameha realized the dire effects this industry on his people, he "declared all the sandalwood the property of the government and ordered the people to devote only part of their time to its cutting and return to the cultivation of the land" (ibid.: 1992:204). Kamehameha also proclaimed sustainable harvesting strategies as noted by Kamakau, who wrote, "He ordered the sandalwood cutters to spare the young trees and, not to let the felled trees fall on the saplings" (ibid.:209-210).

On May 8<sup>th</sup>, 1819, Kamehameha, who had seen the onset of impacts brought about by foreign introductions, died at his royal residence at Kamakahonu in Kailua-Kona and named his son 'Iolani Liholiho heir to his kingdom (Kamakau 1992). By May 21<sup>st</sup> 'Iolani Liholiho (Kamehameha II) at the age of twenty-one began his rule. As traditional custom dictated and to allow for all people to rightfully mourn the loss of their chief, all *kapu* were relaxed following the death of a chief (ibid.). It was the responsibility of the new ruler to conduct the proper rituals and ceremonies to reinstate all *kapu*. However, Liholiho's attempts to reinstate the long-standing *kapu* system was futile and the future of the *kapu* system stood in a state of uncertainty. *Kuhina Nui* (Premier), Ka'ahumanu (the wife of Kamehameha and the *hānai* (adopted) mother of Liholiho) and his biological mother Keōpūolani lured the young chief back to Kona and the *kapu* system was symbolically abolished when Liholiho ate in the presence of his mothers. While Liholiho, his mothers and other chiefs favored the complete abolishment of the *kapu* system, others including Kekuaokalani and his followers prepared to wage war, determined to have the ancient laws reinstated. After several failed attempts at negotiation, Liholiho's army led by Kalaimoku went head-to-head against the forces of Kekuaokalani in the Battle of Kuamo'o (Fornander 1918–1919). Western weaponry had already permeated traditional Hawaiian warfare and Kekuaokalani, who stood behind the ancient laws of the land was killed by gunfire on the battlefield alongside his wife Manono, thereby extinguishing the last public display of resistance. The abolishment of the *kapu* system in 1819, began to undermine the very foundations upon which traditional Hawaiian culture was formed. Adding to an already socio-politically fractured society was the arrival of Protestant missionaries who sought to fill the spiritual void of the Hawaiian people.

In October of 1819, just five months after the death of Kamehameha, the first American Protestant missionaries aboard the Brig. *Thaddeus* left Boston, Massachusetts and by March 30<sup>th</sup>, 1820, sailed to Kawaihae on the northwest coast of Hawai'i Island (Hawaiian Mission Children's Society 1901). Having heard of the overturning of the ancient *kapu* system, these early missionaries formed close alliances with some of Hawai'i's royalty, including Ka'ahumanu who held a tremendous amount of political power. Starting in 1823, these early missionaries, one of which included William Ellis (1917) set out into the remote parts of the islands in search of suitable locations for future mission stations and within a few short years, mission stations were being constructed outside of the main town centers. Christian beliefs quickly spread and soon established a firm foothold in the islands. The missionaries quickly discovered that many Hawaiians were selective about what aspects of Christianity they were willing to adopt. In striving for complete conversion, the missionaries with the help of the *ali'i* implemented laws that enforced Euro-American beliefs on the Hawaiian people. To an extent, this furthered the efforts of the missionaries. Despite these massive cultural changes, many Hawaiians continued to hold to their ancient beliefs, especially those associated with their relationship to the land. Throughout the remainder of the 19<sup>th</sup> century, introduced diseases and global economic forces continued to degrade the traditional life-ways of the Hawaiian people.

### **Private Property and Its Effects on Traditional Concepts of Land and Land Use Practices**

By the mid-19<sup>th</sup> century, the ever-growing population of Westerners in the Hawaiian Islands forced socioeconomic and demographic changes that promoted the establishment of a Euro-American style of land ownership. By 1840, the first Hawaiian constitution had been drafted and the Hawaiian Kingdom shifted from an absolute monarchy into a constitutional government. Convinced that the feudal system of land tenure previously practiced was not compatible with a constitutional government, the *Mō'i* Kauikeaouli and his high-ranking chiefs decided to separate and define the ownership of all lands in the Kingdom (King n.d.). The change in land tenure was further endorsed by missionaries and Western businessmen in the islands who were generally hesitant to enter business deals on leasehold lands that

could be revoked from them at any time. The push for exclusive private property rights culminated in the *Māhele ʻĀina* of 1848 and the subsequent *Kuleana Act* or *Enabling Act* of 1850.

While the formalization of private property rights was a success for many Westerners, this ultimately led to the displacement of many Hawaiians from their ancestral lands—lands that they had come to know so intimately. In general, although many Hawaiians were awarded lands during this period, it was realized that the parcels they were awarded were insufficient to sustain their traditional subsistence lifestyles. Additionally, access to resources that were once a part of the now fragmented *ahupuaʻa* system further curtailed traditional subsistence activities. As many Hawaiian continued to migrate to the populated centers around the islands and even elsewhere, large tracts of land that were once dotted with small communities and extensive traditional agricultural fields were being prospected for large scale commercial agriculture and ranching. Although these industries added to the cultural tapestry of the islands, such operations required vast amounts of land and water. The mass acquisition of land and the diversion of water from their natural courses during the 19<sup>th</sup> and 20<sup>th</sup> centuries resulted in numerous court battles between Western businessmen competing to increase their operations and native Hawaiians who willfully held to their traditional lifeways. Such issues continue to be vetted in Hawaiʻi courtrooms.

Formerly forested lands were being grazed down and, in some places, planted with introduced species of grass and various shrubs to form natural fencing and to be used as livestock feed (Henke 1929). In the drier leeward area of Hawaiʻi, the planting of *kiawe* or algaroba (*Prosopis robusto*) proved to be useful for the cattle and apiary industry (ibid.). By the mid-19<sup>th</sup> century, the apparent destruction of native forest habitat had severely diminished the water supply of islands, ultimately prompting action by the Hawaiian Kingdom government. In 1876, the Kingdom legislature under the administration of King David Kalākaua passed “An Act for the Protection and Preservation of Woods and Forests” (Planters’ Labor and Supply Company 1887:438).” Between 1876-1910, uncoordinated efforts between the government and various agricultural sectors were undertaken to remedy the loss of native forests and to increase water supply (Cannarella 2010). Wild ungulates were removed from some native forests habitats—an effort that began in the 1830s—and efforts to fence off sections of intact forests set the foundation for Hawaiʻi’s forest reserves. To replenish severely degraded forests, a large number of non-native species were experimentally planted, including, *paina* or ironwood (*Casuarina equisetifolia*), silver oak (*Grevillea robusto*), wind acacia, sour plum, and a number of other species (Henke 1929). Efforts to diversify the Kingdom’s economy and the long-standing trend of introducing exotic plant and animal species to the islands continued to mount.

The introduction of large-scale planting of sugar cane during the mid- to late-19<sup>th</sup> century resulted in massive land clearing efforts around the islands. The success and growth of the sugar industry within the more arid parts of the islands was highly dependent upon an ample supply of irrigation water (Wilcox 1996). Occasional wildfires and pests such as the leafhopper threatened the burgeoning sugar industry (Campbell and Ogburn 1990). To ensure economic prosperity, these sugar companies invested in experimental agriculture. New varieties of cane collected from various parts of the world were introduced without restraint and tested to meet the climatic challenges of growing cane in Hawaiʻi. By the 1890s, under the administration of King David Kalākaua, efforts to regulate plant and animal imports, many of which carried pests that were unknown to the islands, had become a priority for the Hawaiian Kingdom government.

## HISTORY OF BIOCONTROL IN THE HAWAIIAN ISLANDS

The use of classical biocontrol, “the suppression of pest populations by introduction and liberation of natural enemies,” has been actively undertaken in the Hawaiian Islands for roughly 130 years with varying degrees of success (Funasaki et al. 1988:105; Lai 1988). Throughout the latter half of the 19<sup>th</sup> century, as the Hawaiian Islands became an agricultural hotspot for sugar cane and other crops, many new plant species, some carrying insect pests, were introduced without restraint. In 1890, the Hawaiian Kingdom Government, under the administration of King David Kalākaua established the Commissioners of Agriculture to prevent unwanted immigrant pests from entering the islands, and to control those that had already been introduced. The duties of the Commissioners were detailed in Chapter II of *Session Laws of 1890*. Chapter II titled “An Act Relating to the Suppression of Plant Disease, Blight, and Insect Pests” reads:

SECTION 2. It shall be the duty of such Commissioners to seek to prevent the introduction into this Kingdom of any plant disease, blight, or insect pests injurious to any tree or trees, plant or plants, or vegetation; and to seek to exterminate any such diseases, blight or insect pests now existing or hereafter introduced.

They shall have the power to enter upon any premises where they have reason to believe there is any tree, plant, or vegetation affected with any disease, blight, or insect pest; and to take all reasonable and proper steps to prevent the spread of any such disease, blight or insect pest, and if

after due trial (such trial to be not longer than ten days) it is found by said Commissioners, or one of them, that the trees, plants or vegetation cannot be cured, or the blight destroyed, that then an in such case he or they may order the same destroyed. (Kalakaua 1890:4–5)

The initiation of the 1890 laws was in response to unregulated efforts to control pests—an act that prior to 1890 was being initiated at the whim of private citizens. The earliest accounts of the unregulated use of biocontrol can be traced back to 1865, when Dr. William Hillebrand, a physician, and naturalist, brought the mynah bird (*Acridotheres tristis*) from India to Hawai‘i to control army worms that were infesting Hawai‘i’s pastures (Funasaki et al. 1988). Because of the mynah bird’s appetite for rotting and decomposed things, and for its use of garbage as nesting material, the bird was given the Hawaiians name of “*manu-‘ai-pilau*,” which can be translated as the bird that consumes rotten things (Pukui and Elbert 1986:486). The mynah bird is also known in Hawaiian as “*piha‘ekelo*”, literally translated as “full of ‘ekelo sound,” a name given because of its raucous nature (ibid.:326). The debate over whether the introduction of the mynah bird was successful in controlling army worms spilled over into local newspapers. Proponents of the mynah bird emphasized its success, however, others alleged that such comments poorly represented the birds’ impacts to agriculture and to the people. An article published in *The Pacific Commercial Advertiser* in 1876 challenged some of the alleged successes:

THOSE CATERPILLARS.—The *Gazette* says that owing to the large increase of *mynah birds*, “not a caterpillar is to be seen in this regions,” (Honolulu) while at points outside of this favored range of the birds the grass has been destroyed. This would be a very pretty and pleasing statement in favor of the usefulness of the *mynahs*, if it were true, as unfortunately it is not. Right here and now, in the immediate neighborhood of the city, on the plains and elsewhere the birds abound, caterpillars do much more abound,—in such immense quantities that it would be simply impossible for the former to make any perceptible impressions on the mass. No doubt the *mynah* would not refuse a fat caterpillar now and again; but we don’t believe they prefer them as a regular diet, for the bird is something of an epicure and delights to range from stolen beefsteak to a nest of pigeon’s or dove’s eggs. Chickens are very good at destroying the vermin, so far as their capacities go; and turkeys are better. But the plague is usually of but brief duration. (The Pacific Commercial Advertiser 1876:3)

Complaints of the mynah bird attacking people and livestock filled the local newspapers throughout the late 19<sup>th</sup> century. The noisy mynah bird had become such a nuisance to the residents of Honolulu that some people took to the city with guns to exterminate the birds. The mynah bird proponents fired back and proposed a law that would prevent the killing of the birds. An article written in the November 9<sup>th</sup>, 1894, issue of *The Hawaiian Star* blamed the mynah bird and the dove for aiding in the spread of another noxious introduction, *Lantana camara*, which was brought to the islands from “tropical America in the year 1858” (The Hawaiian Star 1894:3).

During Hawai‘i’s sugar plantation era, rats had become a serious pestilence to sugar plantation owners and considerable attempts to bring Hawai‘i’s rat population under control were being actualized. An article published in the March 31, 1883, edition of *The Pacific Commercial Advertiser* details the proposed introduction of the infamous mongoose (*Herpestes javanicus*), a native of India to Hawai‘i’s cane fields:

THE Planters’ Monthly has lately been proposing the introduction of a little animal from India called the mongoose, as a destroyer of rats. He is a famous ratter, surpassing the cat or the ferret. He is described as a lively little urchin, about the size of a weasel, as having a snaky body, vicious looking claws, a sharp nose, a villainous eye and looks like “murder incarnate.” In speaking of his action in capturing rats, it is said that he crawls sinuously up to his victim until within easy distance for a rush, and then strikes with unerring aim, snapping rats just at the base of the brain. The rat has not time even to squeak, so sudden and deadly is the onslaught. Wherever the rat can enter the mongoose can follow. Thus as a ratter this lively little Indian is incomparable, but the trouble is he will not confine his operations to what is deemed his legitimate business. Some writers have endeavored to save his credit as a poultry destroyer, but a naturalist, who has carefully observed his characteristics, says that he is a general destroyer, not only of everything under, but of many creatures over his size. When in a cage the sight of a small living creature made him frantic and whenever he escaped, as he sometimes did, he made a sensation in the poultry house. The mongoose is not content with marauding forays in the yard, but he seems to pervade the house when domesticated... The rat is unquestionably a great pest of the cane and rice planter and grain cultivator in all parts of the world. The rat pest was deemed so serious here some fifty years ago that an enlightened and enterprising Commissioner of the Hawaiian Government, sent inquest of Chinese... to procure a species of snake famed as a destroyer of rats; but the Hawaiian people, whose sacred soil had been kept free from snakes and toads by some patron saint equal in influence to St. Patrick, conceived a holy terror of the snake, notwithstanding his possible utilities, and passed a decree that Hawaii would have no

snake in her plantations. The destruction of rats in the cane-fields was hardly deemed a sufficient compensation to the Hawaiian mind for the probable presence every now and then of his snakeship in the thatch of the Hawaiian *hale pili*... (The Pacific Commercial Advertiser 1883:2)

By September of 1883, Mr. William H. Purvis, a plant collector and investor in the Pacific Sugar Mill at Kukuihaele on Hawai'i Island, imported seven mongooses, fowls, and exotic plants from Australian colonies (Daily Honolulu Press 1883). The imported mongooses were "...intended for the damp lands of the Kukuihaele plantation at Hamakua..." (ibid.:4). A number of *'iole manakuke* or mongooses, were liberated in the cane fields of both Hilo and Hāmākua (Funasaki et al. 1988; Pukui and Elbert 1986). Subsequently, in 1885, mongooses were released on Maui, Moloka'i, O'ahu, and Kaua'i. While mongoose populations had quickly established themselves on Maui, Moloka'i, and O'ahu, to date, the mongoose has not established itself on Kaua'i. Both introductions rapidly multiplied and spread beyond their intended target species. While the introduction of the mongoose appears to have some success in combatting the rodents, their impacts were highlighted in newspaper editorials as early as 1886, from writers complaining that the mongooses were becoming a pest in their own. One such article read:

The mongoose is a useful little creature for the destruction of rats. He was brought here for that purpose, and, we believe, had done his work thoroughly well on several plantations. But the mongoose does not confine himself to rats, and complaints come from some quarters that ducks and chickens are being destroyed by wholesale. The mongoose may ultimately prove to be a greater nuisance than a benefit. (The Daily Bulletin 1886:2)

By the late 19<sup>th</sup>-century, the mongoose had become a sort of cultural symbol. A review of newspaper articles published in Hawai'i during this period reveals that the mongoose was often used to reference people or things that exhibited wild behavior and for people who came to Hawai'i that had no intent to leave. However useful these introductions were in controlling its intended target, over time, their unintended impacts had become obvious. In its wake, the mongoose destroyed livestock, the eggs of native bird species, and the noisy mynah bird is associated with aiding in the proliferation of the noxious weed, *Lantana camara* (Funasaki et al. 1988). These early and poorly thought out introductions are what Funasaki et al. (1988:106) described as a classic example of "biological control gone astray." Funasaki et al. (ibid.) emphasize that:

However, it must be realized that prior to 1890, planning and evaluation before the introduction of any organism were nonexistent simply because they were not required. There were no laws or regulations restricting or prohibiting the importation of any plant or animal from other geographical areas into Hawaii.

While these early introductions appear to have been a practical solution to a growing problem, ultimately, the lack of regulation, adequate pre-release testing protocols, and post-release monitoring created even more problems for Hawai'i's environment and people. In response to these ill-fated early and unregulated releases, Hawai'i's government leaders began to formalize a plan that would limit the introduction of unwanted pest species and control those that had already been introduced.

### **Regulated Efforts to Control Unwanted Pest in Hawai'i**

By the late 19<sup>th</sup> century, efforts to study the natural enemies of unwanted pests that were impacting Hawai'i's agricultural industry were being formalized. In 1893, the year of the unlawful overthrow of Queen Lydia Lili'uokalani, the provisional government of the Republic of Hawai'i appointed Albert Koebele as the entomologist to biologically control the many species of immigrant pests (Funasaki et al. 1988). Koebele is credited with being "one of the first, if not the very first entomologist, to engage in the introduction of natural enemies as a method of combating insect pests" (Giffard et al. 1925:340). Between 1893 and 1910, Koebele spent much of his time traveling to places like Australia, Fiji, Japan, China, Ceylon (modern-day Sri Lanka), Mexico, and California where he studied various insects that he thought would be beneficial to combat pests that were introduced to the islands. In 1893, Koebele successfully used biocontrol to combat the cottony cushion scale (*Icerya purchasi*). In summarizing Koebele's biological introductions to the Hawaiian Islands, Giffard et al. (1925:342) remarked:

He made the beginning in this line of work, and much of the time was working alone, yet seventeen species of lady beetles were successfully introduced by him and have become valuable factors in keeping reduced such pests as scale insects, mealybugs, plant lice and leaf mites. At least six other lady beetles were introduced and became established, but after a few years disappeared. The eight lantana insects were introduced by him, and about the same number of miscellaneous parasites of Diptera and Lepidoptera, etc. Following Mr. Koebele in this line of work, the other entomologists have introduced a larger number of beneficial insects, and some of them have produced more

spectacular and valuable results, but this should not in any way lessen the credit to be given to him who was the pioneer in Hawaii in this important branch of entomological work.

Encouraged by Koebele's successes, in 1903, the Territorial Government (formalized in 1898), enacted laws to create the Board of Commissioners of Agriculture and Forestry (the precursor to the Hawaii Department of Agriculture (HDOA)). These early laws provided for facilities and materials "to obtain, propagate, study, and distribute beneficial species of insects to control pest species of insects and weeds" (Funasaki et al. 1988:107). Additionally, a quarantine system to prevent new immigrant pests from entering the islands was also created. Another early organization responsible for the release of a number of biological control agents was the Hawaiian Sugar Planters' Association (HSPA), founded in 1895. In 1904, HSPA instituted an Entomology branch and from its founding to about 1942, this branch aided in combatting a variety of pests that were plaguing Hawai'i's cane fields and threatening the economic promise of the sugar industry (ibid.). Throughout the early to mid-20<sup>th</sup> century, as Hawai'i's agricultural interest grew to include pineapple and other tropical fruit, additional institutions were organized to study and combat its share of pests. Such organizations included the United States Bureau of Entomology and Plant Quarantine's Fruit Fly Laboratory (now U.S. Department of Agriculture's Tropical Fruit and Vegetable Research Laboratory), Experiment Station of the Pineapple Producers Cooperative Associations, HSPA's Experiment Station, Hawaii Agricultural Experiment Station of the University of Hawaii's College of Tropical Agriculture, the California Agricultural Experiment Station of the University of California, and the Hawaii Department of Health (ibid.). By the 1940s and 1950s, the creation and introduction of chemical pest control had become the favored alternative (Howarth 1983). While chemical pest control still maintains its place in managing unwanted pests, the environmental and health risks associated with its use has led to the adoption of stricter regulations and a push towards finding more natural and low-cost alternatives (ibid.).

Collectively, the laws passed in 1890 to regulate unwanted immigrant pests set the foundation for what is known today as Hawai'i Revised Statutes (HRS) Chapter 141, which governs the State of Hawai'i, Department of Agriculture (HDOA)—the state agency responsible for protecting and diversifying Hawai'i's agricultural industry. HDOA's Plant Industry Division maintains three branches: Pesticides Branch, Plant Pest Control Branch, and the Plant Quarantine Branch that collectively work "to protect Hawaii's agricultural industries, environment, and [the] general public by preventing the introduction and establishment of harmful insects, diseases, illegal non-domestic animals, and other pests..." (Department of Agriculture 2016). In 2003, under Hawai'i Revised Statutes (HRS), Chapter 194, the State of Hawai'i legislature authorized the creation of the Hawai'i Invasive Species Council (HISC), the agency responsible for coordinating efforts between various local, state, federal, and international agencies and organizations to stop the introduction and spread of invasive species in the islands (State of Hawai'i 2005). Since the creation of the HISC, millions of dollars have been allocated to various local councils and government departments and programs to combat invasive species. Efforts have been directed at prevention, response and control, research and technology, and outreach (ibid.). There are four invasive species committees that represent each of the four counties (Kaua'i, O'ahu, Maui, and Hawai'i Island) in addition to an aquatic invasive species team (ibid.).

Historically, Hawai'i's biological control programs were aimed at controlling weeds and pests that were adversely impacting the agricultural industry. During the 1970s and 1980s, the heightened interest in native and endemic taxa, fueled by the passing of federal legislation to protect endangered plants coupled with the growth of native-plant organizations has led to greater consideration of the potential risk of introduced biological control agents on endemic taxa (Pemberton 2004). Hawai'i as a "hub for tourism, trade, and military transport" and the state's continued reliance on globally imported goods perpetuates the ongoing assault of introduced foreign species (Messing and Wright 2006). Funasaki et al. (1988:108) report that "more biological control projects against immigrant species of insect pests have been conducted in Hawaii than anywhere else in the world" and nearly a third of the introduced species (roughly 200 pest species) are known to be established. Reimer (2002:86) reports that "many of these introductions appear to have been successful in that the pest populations eventually did drop to acceptable levels, although scientific evaluations of the effectiveness of these introductions have been virtually non-existent." The lack of natural enemies to combat such pests has propelled state agencies, namely HDOA to continue to identify the pests' natural enemies and to develop stringent host-range testing protocols for the study and release of such agents. Although the application of classical biocontrol in Hawai'i has, at times proven to be economically successful, it is recognized that environmental risks are inherent in biological control programs (Holland et al. 2008; Howarth 1983; Pemberton 2004).

Historically, several individuals and agencies have participated in the study and release of biocontrol agents in the Hawaiian Islands. Today, the U.S. Department of Agriculture-Animal Plant Health Inspection Service-Plant Pest Quarantine (USDA-APHIS-PPQ) and the HDOA regulates the importation of biocontrol agents (Reimer 2002). While these agencies have distinct mandates and jurisdictions, there is some overlap with respect to the regulated use of biocontrol. Efforts to improve pre-release testing has resulted in a federal and state permitting process which includes an environmental review. In summarizing this process, Reimer (ibid.:87) writes:

All biocontrol agents imported for weed control attack plants and are by definition plant pests. They are, therefore, regulated by USDA.

The USDA requires separate permits for

- 1) Importation of a plant pest into the U.S.;
- 2) Movement of a plant pest between States; and
- 3) Release of a plant pest into the environment.

The federal permitting process requires the submission of PPQ Form 526 (Application for Release) that is forwarded to the HDOA for review and recommendations. All applications to date, for which HDOA has recommended rejection, have also been denied by the USDA. If approval is recommended by HDOA, USDA then reviews the application. This process usually involves review by the Technical Advisory Group; however, Hawai'i applications are exempt from TAG review due to the thoroughness of the HDOA review process. A draft environmental assessment (EA) is requested from the applicant for any requests for the release of weed biocontrol agents. The USDA prepares the final EA. If endangered or threatened species potentially are affected by the release of a biocontrol agent then the application is sent to the U.S. Fish and Wildlife Service for review. A release permit is issued if the evaluation of the EA produces a finding of no significant impact (FONSI).

While there are some similarities between the federal and state process, Chapter 150A of the Hawai'i Revised Statutes (HRS) regulates the importation of any plant or animal into the State of Hawai'i whether or not it is a plant pest (Reimer 2002). HRS 150A strictly prohibits the importation of all non-domestic animals and microorganisms unless approval is obtained by the Board of Agriculture. The review process for a state importation permit application involves six steps. Reimer (ibid.:88-89) provides a synthesis of the six-step process:

First, the application is submitted to the HDOA with all of the required and pertinent information, including information on host specificity, distribution, preferred habitat, temperature requirements, etc. Host specificity studies may be carried out either in the country of origin or in one of the three approved containment facilities in Hawai'i. The Advisory Subcommittee then reviews the application. The recommendations from this subcommittee are passed on to the Plants and Animals Committee for their recommendations to the BOA. The BOA either approves or disapproves the application. If approved, the application is submitted to a public hearing process. Comments from the public are brought back to the BOA for discussion, followed by final approval or disapproval of the application. If approved, a State permit is issued. The organism may be imported and released if both State and Federal permits have been issued and permit conditions are met by the importers. The HDOA review process for the introduction of biocontrol agents has evolved into an effective system that screens agents for host specificity and potential negative

Additionally, efforts to improve public transparency following the decision rendered by the Hawai'i Intermediate Court of Appeals (*Ohana Pale Ke Ao v. Board of Agriculture, State of Hawaii*, 118 Hawaii 247, 249-50, 188 P.3d 761, 763-64 [Hawaii Ct. App. 2008]) has made the HDOA recognize that such biocontrol activities are subject to Chapter 343, Hawai'i Revised Statutes (Hawai'i Environmental Policy Act, HEPA) (Holland et al. 2008). Between 1890 and 1999, a total of 708 natural enemies have been released in Hawai'i, of which 286 have become established and the majority (237) of the introduced agents have contributed to the control of the target pest species (Reimer 2002). Prior to 1944 (before the formalization of the BOA), only 54% of the introduced agents were host-specific. This percentage has increased over the years with 77% host specificity being reported between the years 1944-1975. Since 1975, host specificity for all released biocontrol agents increased to 100% (ibid.). While stricter regulations have been adopted and modified over the years to reduce the environmental risk associated with the use of biological control agents, continued field research and open dialogue remains as a critical component to improving our understanding and mitigating the environmental, economic, and cultural risks associated with such actions.

## INTRODUCTION OF *MICONIA* TO THE HAWAIIAN ISLANDS AND EARLY ERADICATION EFFORTS

*Miconia* is one of fifteen known Melastome species naturalized in the Hawaiian Islands and as noted in HAR §4-68-10, all species have been declared a noxious weed in the State of Hawai'i. *Miconia* is found in the wet, windward regions of four of the major Hawaiian Islands—Hawai'i, Maui, O'ahu, and Kaua'i in habitats receiving 1,800-2,000 millimeters or more of annual rainfall (Medeiros et al. 1997). Figure 7 shows the distribution of established and potential *Miconia* habitats on five of the major Hawaiian Islands.

## 2. Background

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*Miconia* was first introduced to the Wahiawa Botanical Garden on O‘ahu in 1961 by botanist and horticulturalist Joseph F. Rock (Medeiros et al. 1997). In 1964, a single *Miconia* was planted at the Harold L. Lyon Arboretum in Mānoa Valley. A newspaper article published in the July 15<sup>th</sup>, 1965 edition of the *Honolulu Star-Bulletin*, shows a specimen of *Miconia* growing on O‘ahu (Figure 8). In 1971, Pacific botanist, F. R. Fosberg who studied the developing infestation of *Miconia* on the high volcanic island of Tahiti, warned Hawai‘i authorities of the plant’s potential to destroy native Hawaiian forests (ibid.). Despite the warnings, between 1975-1983, *Miconia* was cultivated at the Waimea Botanical Garden on the northwestern shore of O‘ahu, however, the seasonally dry climate limited its growth and its potential to spread which led employees to destroy the plants altogether (ibid.). Naturalized seedlings were noted as early as 1975, within the Mānoa Valley vicinity, however, it was not until the 1990s that efforts to remove the few naturalized specimens were undertaken by local organizations such as the Sierra Club. In the early 1990s, after recognizing the plant’s threat, the staff at the Harold L. Lyon Arboretum destroyed the original parent plant. *Miconia* is now naturalized at several locations on the Ko‘olau Range, including Mānoa, Kalihi and Nu‘uanu valleys (see Figure 7).

On Hawai‘i Islands, *Miconia* was first reported in the early 1960s in the Hilo District at the estate of Herbert Shipman and by 1971, this species had become naturalized. A review of historical newspaper articles indicate that volunteers efforts to manually eradicate populations of *Miconia* on Hawai‘i Island were in effect as early as 1982. Prior to 1992, *Miconia* plants were being sold and has since become naturalized in many other loci on the windward side of Hawai‘i Island, including Hakalau, Onomea, Pāpa‘ikou, Hilo, Pana‘ewa, Waiākea Uka and at various locations in the Puna District. *Miconia* is also found, although less extensively, at locales in the North and South Kona Districts (see Figure 7). The *Miconia* infestation on Hawai‘i Island is considered to be the most extensive in all of Hawai‘i (Medeiros et al. 1997). *Miconia* population on Hawai‘i Island is estimated to cover some 250,000 acres, ranging from monotypic stands to single trees (Tavares and Santos 2002).

On Maui, in the early 1970s, *Miconia* was introduced at Helani Gardens, a private nursery and botanical gardens located in the windward Hāna District. During the early 1990s, when the threat of *Miconia* was realized, *Miconia* populations had already become abundant and naturalized at Helani Gardens. Concerted localized efforts to eradicate established populations at Helani Garden resulted in a more manageable situation. Despite control at Helani Gardens, between 1991-1993, five additional *Miconia* populations were identified in windward East Maui. As of 1997, ten populations of *Miconia* were known to exist on the island of Maui from near sea-level to 430 meter elevation, including Upper and Lower Nāhiku, Hāna/Olopawa, Ke‘anae, Hoalua, two sites at Huelo, Peahi, Upper Ke‘anae, and Kaupō (see Figure 7) (ibid.).

After receiving a report from a resident of the Wailua Homestead in east Kaua‘i in 1995, HDOA followed up and confirmed a population of *Miconia* that was reported to have spread from a single large tree that was transported from O‘ahu and given to a nursery on Kaua‘i. Some twenty plants were removed, however, by December of 1995, additional monitoring around the site resulted in the discovery of two *Miconia* plants with plastic pots attached to its roots. Additional populations of *Miconia* were discovered along the Wailua River and in the vicinity of the nursery as well as the Kapa‘a Homesteads. In 1996, a single plant was discovered further inland near the Wailua Reservoir (ibid.) (see Figure 7). Although *Miconia* has not been reported on Ni‘ihau, Lāna‘i, Kaho‘olawe, or Moloka‘i, the wet, windward region of east Moloka‘i contains optimal growing conditions for *Miconia* (see Figure 7). The drier conditions found on the former three islands make for less suitable *Miconia* habitat.

In the early 1990s, after being officially listed as a noxious weed, concerted efforts to manually eradicate this highly invasive plant was initiated on the island of Maui. In 1991, the Melastome Action Committee (MAC) convened and began developing an eradication plan for Maui. The Maui MAC also obtained funding to drive aggressive eradication efforts. By 1995, a second MAC was set up on Hawai‘i Island and this group effectively organized *Miconia* mapping and control efforts. On O‘ahu and Kaua‘i where *Miconia* was less widespread, eradication efforts were led primarily by HDOA, DLNR, and volunteer groups. A statewide interagency public education and involvement campaign dubbed “Operation Miconia” was launched. Wanted posters, newspaper stories, public service announcements, and *Miconia* reporting hotlines helped to create more public awareness about the plant and served as an important tool in helping officials located new *Miconia* populations (Medeiros et al. 1997). These early eradication and containment efforts utilized a combination of applied herbicides and mechanical removal. While these efforts have been successful in helping to contain *Miconia* populations, increased operational cost associated with the spread of *Miconia* into more remote regions compounded by averse policy has shifted *Miconia* management strategies (Leary et al. 2013; Medeiros et al. 1997). To enhance *Miconia* management efforts, DOFAW is seeking biocontrol as a potentially viable option.

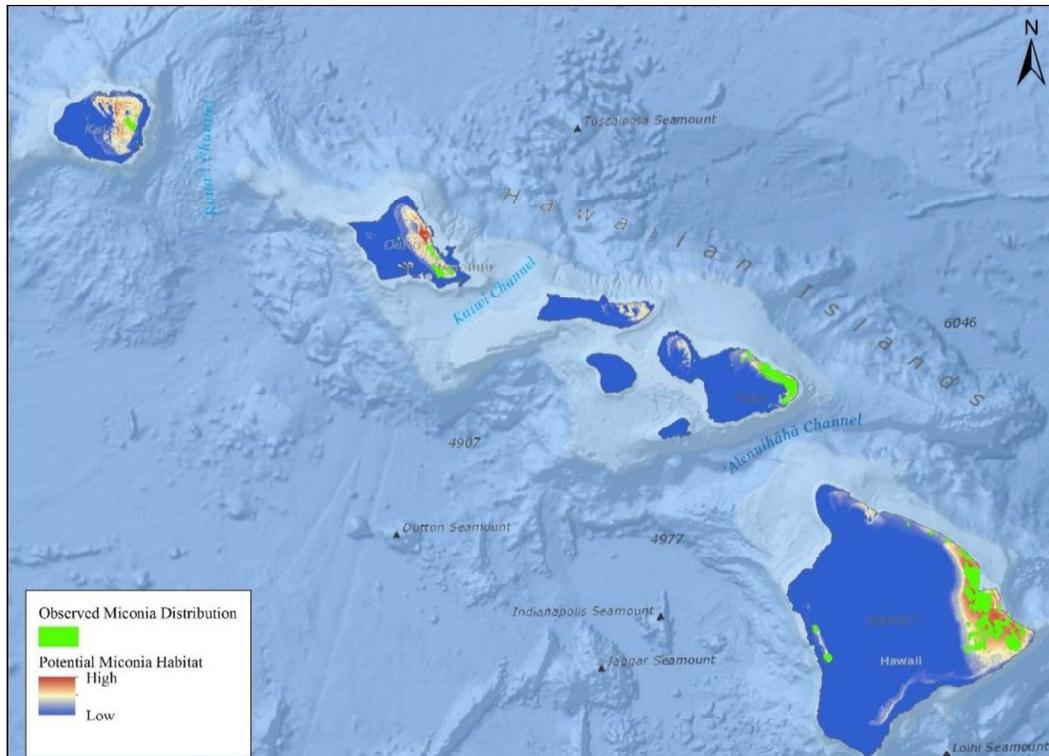


Figure 7. GIS map showing areas with confirmed *Miconia*'s infestations and potential *Miconia* habitat across the Hawaiian Islands.



Tamatsu Kubota, left, and Lindy Loo, of the Hawaii Association of Nurserymen, discuss attributes of a specimen *Miconia magnifica*, a rare ornamental with two-foot long reddish-maroon leaves. The two men will appear on KHVH-TV's "Aloha State Farmer" program at 8:30 a.m. Sunday to talk about a two-day nursery course to be given next Wednesday and Thursday at the East-West Center, University of Hawaii campus. A variety of topics will be covered by specialists.

Figure 8. *Miconia* shown in a 1965 HonoluluStar-Bulletin article (Sybert 1965:58).

## A Concise Global and Pacific Overview of *Miconia Calvescens*

In its native habitat of Central and South America, *Miconia calvescens*, which is both abundant and widely distributed across the lowlands have been reportedly used on occasion as fuel (Williams 1936). Although the seeds are described as sweet and attractive to frugivorous bird and other insects, the author of this report has not identified any documented sources describing its use as food or medicine by humans. Although *Miconia* has been introduced to places in Europe and Asia it has not been deemed as an invasive species (CABI 2018). However, in parts of Australia, the Dominican Republic, and in the French Polynesian Islands of Tahiti, Raiatea and Mo'orea, *Miconia* has become a major threat to tropical native ecosystems (Meyer and Florence 1996). Prior to this plant's arrival in Hawai'i, its impacts on the tropical forest ecosystems on high volcanic islands in French Polynesia were carefully studied. Juxtaposing the long-term environmental impacts of the *Miconia* infestation on Tahiti to Hawai'i has long-served as an important assessment and projection tool as both islands share highly comparable geographical, climatic, topographic, and biotic similarities (Medeiros et al. 1997).

*Miconia* was introduced to the Papeari Botanical Gardens in Tahiti in 1937 as a garden ornamental and was later outplanted on the plateau of Taravao where it thrived in the moist tropical climate (ibid.). In Tahiti, *Miconia* has been named *pa'a honu* which means turtle carapace and is a local reference to the large leaf size which resembles a turtle shell (CABI 2018). In the early part of the 1970s, botanist began to raise awareness of the plant's growing infestation and warnings were put out to authorities including those in Hawai'i. After observing the infestation in Tahiti, the late Smithsonian Institution botanist, F. Raymond Fosberg warned Hawai'i authorities stating that "It is the one plant that could really destroy what's left of the native Hawaiian forest" (Altonn 1991:A-8). Nearly thirty years after its introduction to the French Polynesian islands, it has been deemed by scientist as one of the most ecologically damaging pest plants (Medeiros et al. 1997; Meyer and Florence 1996). It now dominates over two-thirds of the island of Tahiti and in some locales, grow as pure monotypic stands. *Miconia* has since spread to the surrounding islands of Raiatea and Mo'orea and to the Society archipelago (Meyer and Florence 1996). In describing this plant's impacts on the indigenous and endemic flora Meyer and Florence (ibid.:778) state that "In Tahiti, seventy to 100 native plant species including forty to fifty endemics are estimated to be directly threatened by *M. calvescens*." Additionally, Florence and Meyer (ibid.:781) explain that "dense monotypic stands of *M. calvescens* prevents not only regeneration of the native plant species but also removes habitat for other animals." Although no cultural uses of *Miconia* have been identified in the remote tropical islands of French Polynesia, it is widely recognized that the spread of *Miconia* into native forests threatens the indigenous and endemic taxa.

The extensive spread of *Miconia* throughout the French Polynesian island of Tahiti and its impacts on the native wet forest habitat is an ecological and cultural concern that is widely applicable to the Hawaiian Islands. Hawai'i's wet forest habitat, which is a culturally valued resource has maintained a significant role in perpetuating the life-ways and traditions of the Hawaiian people. Continued encroachment upon this habitat by highly invasive species such as *Miconia* poses an ecological threat that has significant cultural ramification.

## Cultural Uses of Native Wet Forest Habitat in Hawai'i

The use of native wet forests plants in traditional Hawaiian culture is both extensive and well-documented (see Abbott 1992; Buck 1957; Krauss 1993). The flowers, fruits, woods, roots, and bark of many native plants found in the wet forests of the Hawaiian Islands have been and continue to be extensively used in many Hawaiian cultural practices. Although plants were held in high esteem and celebrated in traditional lore, plants were also valued as a collective whole for its ability to attract diverse wildlife, such as birds and insects. Endemic Hawaiian birds were highly valued for their colorful plumages which were extensively used in creating spectacular feathered garbs, headdresses, *lei*, and other insignia that were worn or displayed traditionally by Hawaiian nobility. The task of collecting birds was undertaken by the *po'e kia manu* (bird catchers), who held a profound understanding of avian behavior and the forest resources, including what plants to use to attract and capture the birds.

The plethora of plants found in Hawai'i's wet forest was and remains an integral component of many traditional Hawaiian cultural practices. Large trees provided a variety of hardwoods from which canoes, houses, *ki'i* (carved images), fishing accessories, and various utilitarian and recreational implements were made. Aerial roots of the climbing '*ie ie* (*Freycinetia arborea*) were harvested and plaited together to form tightly stitched '*ie* (baskets). Ferns were collected from the forest floor and woven into *lei* or tucked into *kapa* (bark cloth) as a scenting agent. Flowers and fruits were collected for *lei*, natural dyes, and sometimes mixed together with other plants to make medicinal concoctions. Additionally, plots in the wet forests were cleared to cultivate *olonā* (*Touchardia latifolia*), an endemic plant that was purposefully grown and from which cordage of the finest quality was made. Hawaiian ethnobotanist, Beatrice Krauss notes:

The finest cordage made by the ancient Hawaiian—in fact, the finest cordage made in the Pacific basin—was made from *olonā*. *Olonā* was cultivated in patches of two or three acres primarily in wet, upland areas. Young shoots or layered cuttings were used for planting material; the latter were obtained by bending down a branch and covering the portion touching the ground with soil so that roots emerged from it. The rooted section, with its terminal leaves, was severed and this became a rooted cutting. Planting was close to prevent side branches from growing. *Olonā* patches were kept free of weeds, especially from [*sic*] creeping vines, which were abundant in surrounding areas; these would otherwise have choked the *olonā* plants. The stalks were ready for harvest at the end of a year or eighteen months. (Krauss 1993:27–28)

The forest itself also holds profound spiritual implications as various plants found in the wet forest were considered *kinolau* (embodiments) of named deities, many of whom took specific plant forms of the deity Kū. Such examples include but are not limited to Kūka‘ōhi‘alaka, Kūpūlupulu, Kūmokuhālī‘i, and Kūalanawao (Fornander 1919–1920; Handy and Handy 1991; Kamakau 1976). While Kū is considered the activating energy associated with the forest, other deities are also recognized including Kāne, who is embodied in the sun and in freshwater; Lono who is connected to winds, storms, and fertility; and Laka who is associated with transpiration (Edith Kanaka‘ole Foundation n.d.). Therefore, the Hawaiian forest, at a minimum, represents the dynamic interplay between Hawaiian deities.

These forested spaces also filled an important spiritual and utilitarian need for Hawaiian *hula* dancers, healing practitioners, and artisans, all of whom rely heavily on Hawai‘i’s forest resources (Stewart 2003). *Hula* practitioners have long valued Hawai‘i’s rich forest, which continue to be extensively used in making adornments, implements, and in furnishing the *kuahu* (altars). In describing the *kuahu*’s association with the forest, Emerson (1909:19) explained that “the wildwoods of Hawaii furnished in great abundance and variety small poles for the framework of the *kuahu*, the altar, that holy place of the *halau*, and sweet-scented leaves and flowers suitable for its decoration.” In detailing the thoughtful process of greening a *kuahu*, Emerson adds:

It was necessary to bear in mind that when one deflowered the woods of their fronds of *ie-ie* and fern or tore the trailings lengths of *maile*—albeit in honor of Laka herself—the body of the goddess was being despoiled, and the despoiling must be done with all tactful grace and etiquette.

It must not be gathered from this that the occasion was made solemn and oppressive with weight of ceremony, as when a temple was erected or as when a *tabu* chief walked abroad, and all men lay with their mouths in the dust. On the contrary, it was a time of joy and decorous exultation, a time when in prayer-song and ascriptions of praise the poet ransacked all nature for figures and allusions to be used in caressing the deity. (Emerson 1909:16)

Other plants utilized in greening a *kuahu* included ‘*ie‘ie* (*Freycinetia arborea*), *halapepe* (*Pleomele* sp.), ‘*ōhi‘a lehua* (*Metrosideros polymorpha*), ‘*ekaha* (*Asplenium nidus*), *ma‘o hau hele* (*Hibiscus brackenridgei*), *hau* (*Hibiscus tiliaceus*), *kī* (*Cordyline fruticosa*), ‘*ilima* (*Sida fallax*), and *lama* (*Diospyros sandwicensis*) (Emerson 1909).

While historical literature enumerates many different types of *kahuna* (esteemed and highly specialized experts), the *kahuna* whose practice involved the extensive use of both cultivated and wild plants was the *kahuna lā‘au lapa‘au*. These *kahuna* treated the sick using highly tailored plant-based recipes that were accompanied by rituals and ceremonies. With the change in landscape and the arrival of non-native plants to the islands, Krauss (ibid) notes that many “Precontact prescriptions have been altered by addition or substitution of postcontact-introduced plants.” Krauss provides a succinct summary of the meticulous preparation of traditional plant-based medicines:

Different parts of a plant were used for medicine: roots, stems, leaves, flowers, bark, fruits, and seeds. These were prepared for use by brewing, pounding and extracting the juice or sap, pounding and making an infusion, or the part to be used was chewed and swallowed without any preparation. Plant material was pounded in special stone mortars with stone pestles made for this purpose only. In cases where leaves were used, dosages consisted of a specific number of leaves; specific handfuls of leaves; or the quantity of leaves that, when rolled together, fitted within the circle formed when the tips of the thumb and forefinger were joined. When bark was used, a strip of a designated width and length was prescribed. For berries, flowers, flower buds, and the like specific numbers determined the dosage. The “magic” numbers in prescribing dosages, times and, duration of treatment were one, three, and five; four and five; five and six; or five only, according to different sources. Pounded material was strained through or squeezed out with cleaned fabriclike sheath at the base of coconut fronds (‘*a‘a niu*) or with the fibers of the native sedge *makaloa*. Medicinal herbs were usually administered in formulations that almost always included salt and red clay, ‘*alaea*. (Krauss 1993:101)

The adaption of cultural traditions is an important aspect of any living culture. While many artisans continue to utilize Hawai'i's forest plants in a more traditional manner, it is common today to see many Native Hawaiian (and non-Hawaiian) artisans incorporate or draw inspiration from native plants to create contemporary clothing, home furnishings, musical implements, accessories, art, and many other utilitarian and decorative items. The restoration and revitalization of native plant habitat is crucial to sustaining Hawaiian traditions, beliefs, cultural practices well into the future whether that be in a traditional or more contemporary manner.

## 3. CONSULTATION

Gathering input from community members with genealogical ties and long-standing residency or relationships to the study area is vital to the process of assessing potential cultural impacts to resources, practices, and beliefs. It is precisely these individuals that ascribe meaning and value to traditional resources and practices. Community members often possess traditional knowledge and in-depth understanding that are unavailable elsewhere in the historical or cultural record of a place. As stated in the OEQC Guidelines for Assessing Cultural Impacts, the goal of the oral interview process is to identify potential cultural resources, practices, and beliefs associated with the affected project area. It is the present authors' further contention that the oral interviews should also be used to augment the process of assessing the significance of any identified traditional cultural properties. Thus, it is the researcher's responsibility to use the gathered information to identify and describe potential cultural impacts and propose appropriate mitigation as necessary.

### INTERVIEW METHODOLOGY

In an effort to identify individuals knowledgeable about traditional cultural practices and/or uses associated with *Miconia* or the habitat in which it thrives, a public notice was submitted to the Office of Hawaiian Affairs (OHA) for publication in their monthly newspaper, *Ka Wai Ola*. The notice was submitted via email on April 9<sup>th</sup> and was subsequently published in the May 2019 issue of *Ka Wai Ola* (2019:21) (Appendix A). As of the date of the current report, no responses have been received from the public notice. Although no responses were received as a result of the *Ka Wai Ola* publication, ASM staff contacted forty-five individuals via email and/or telephone regarding the preparation of the current CIA. These individuals were selected because they were either recognized cultural practitioners, plant experts, or Native Hawaiian organizations who utilize Hawai'i's forest resources for cultural purposes or were believed to have cultural knowledge about the target species or other plants found within the target species habitat. Of the forty-five individuals contacted, twenty individuals responded to our request with either brief comments, referrals, or accepted the interview request. The names and affiliation of these twenty individuals are listed in Table 1 below. Of the twenty respondents, ASM staff successfully conducted interviews with nine individuals (see summaries below). A complete list of all persons contacted for consultation is available upon request.

The interviewees were asked a series of questions regarding their background, and their experience and knowledge of the target species. Additional questions focused on any known cultural uses, traditions, or beliefs associated with any of the target species. The interviewees were then asked about their thoughts on the cultural appropriateness of using biocontrol control agents and whether they were aware of any potential cultural impacts that could result from the use of biocontrol control. The interviewees were then asked whether they had any recommendations to mitigate any identified cultural impacts as well as share any additional thoughts about the proposed action.

As part of the interview process and with the consent of the interviewees, some of the interviews were audio-recorded for note-taking purposes only (audio files not available). Where audio recordings were not permitted, ASM staff recorded notes throughout the interview process. Upon completion of the interview, ASM staff prepared an interview summary, which was emailed to the interviewees for review. The interviewees were given the opportunity to review the summary for accuracy and allowed to make any necessary edits. With the approval of the interviewees, the finalized version of the summaries is presented below.

**Table 1. Persons contacted for consultation.**

<i>Name</i>	<i>Affiliation, Island</i>	<i>Initial Contact Date</i>	<i>Comments</i>
Shalan Crysdale	The Nature Conservancy, Ka‘ū Preserve, Hawai‘i	3/6/2019	See summary below
John Repogle	Retired from The Nature Conservancy, Ka‘ū Preserve, Hawai‘i	3/6/2019	See summary below
Nohealani Ka‘awa	The Nature Conservancy, Ka‘ū Preserve, Hawai‘i	3/6/2019	See summary below
Arthur Medeiros	Auwahi Forest Restoration Project, Maui	3/7/2019	Responded via email on March 11, 2019, stating “Thank you for your valuable work supporting this essential action to attempt to slow the loss of Hawaiian biota.”
Jen Lawson	Waikōloa Dry Forest Initiative, Hawai‘i	4/3/2019	See summary below
Robert Yagi	Waikōloa Dry Forest Initiative, Hawai‘i	4/3/2019	See summary below
Wilds Brawner	Ho‘ola Ka Manaka‘ā at Ka‘ūpūlehu, Hawai‘i	4/9/2019	See summary below
Sam ‘Ohu Gon III	The Nature Conservancy, O‘ahu	4/22/2019	Responded to interview request but was unable to provide input on this project.
Mike DeMotta	National Tropical Botanical Gardens, Kaua‘i	4/22/2019	See summary below
Wili Garnett	Cultural practitioner, Moloka‘i	5/7/2019	Responded via email stating “I have mostly been involved with <i>Erythrina</i> gall wasp parasite release and monitoring, but experience watching <i>Tibouchina</i> and <i>Schinus</i> degrade watershed on many islands, including Molokai and even cultural resources at Kalaupapa.”
Emily Grave	Laukahi Network, O‘ahu	5/7/2019	Responded via email stating that she was not aware of cultural uses of this plant.
Kim Starr	Starr Environmental, Maui	5/9/2019	See summary below
Forest Starr	Starr Environmental, Maui	5/9/2019	See summary below
Manaiakalani Kalua	Cultural practitioner, Hawai‘i	5/30/2019	See summary below
Talia Porter	Honolulu Botanical Gardens, O‘ahu	6/3/2019	Responded to interview request but was unable to secure an interview.

*Table 1 continues on next page*

**Table 2. continued.**

<i>Name</i>	<i>Affiliation, Island</i>	<i>Initial Contact Date</i>	<i>Comments</i>
Robert Keano Ka'upu	Cultural practitioner, O'ahu	6/16/2019	Responded via phone that he has been interested in learning about the cultural uses of <i>wiliwili</i> but was not aware of any uses or of anyone else who used this wood for cultural purposes.
Hinaleimoana Wong-Kalu	Cultural practitioner, O'ahu	7/16/2019	Responded to interview request but was unable to secure an interview.
Pelehonuamea Harman	Cultural practitioner, Hawai'i	7/31/2019	Referred ASM staff to Dennis Kana'e Keawe
Dennis Kana'e Keawe	Cultural practitioner, Hawai'i	8/12/2019	See summary below
Iliahi Anthony	Cultural practitioner, Hawai'i	8/30/2019	See summary below

*End of Table 1*

### SHALAN CRYSDALE, JOHN REPLOGLE, AND NOHEALANI KA'AWA

On March 6<sup>th</sup>, 2019, Lokelani Brandt and Matt Clark interviewed Shalan Crysdale, John Replogle (retired from the Nature Conservancy), and Nohea Ka'awa of The Nature Conservancy (TNC) Ka'ū Preserve regarding DOFAW's proposed action and to gather any known cultural knowledge of *Miconia*. Shalan indicated that there are no known populations of *Miconia* in Ka'ū. While Shalan and others were aware of *Miconia* infestations on Hawai'i Island they were not aware of any traditional or contemporary uses of this plant.

While Shalan and John were not entirely against the use of biological control agents, they did share some of their concerns. Shalan, John, and Nohea stressed the importance of trial testing to ensure that the release of any proposed biological control agent does not adversely impact other native species as well as other valued crops. They spoke about the limitations of laboratory trial testing that may not account for all the variables that are present in the trees natural habitat. They strongly recommended that extensive trial testing be conducted prior to any proposed field release and they hope to see more post-release field monitoring to safeguard against the spread beyond the intended target species.

### WILDS PIHANUI BRAWNER

Wilds Brawner, Site Manager of the non-profit organization, Ho'ōla Ka Makana'a at Ka'ūpūlehu Dryland Forest, was interviewed by Lokelani Brandt on April 18<sup>th</sup>, 2019. Since 2008, Wilds has worked at the 70-acre Ka'ūpūlehu Dryland Forest preserve performing a variety of duties including management and education.

When asked about his knowledge of *Miconia*, Wilds indicated that in his years of work, he has not encountered *Miconia* populations in the leeward sides of Hawai'i Island, but was aware of its impacts to the wet forest of Hawai'i Island and elsewhere. Wilds indicated that he was not aware of any known past cultural uses of this plant.

When asked about any potential cultural impacts that could result from the use of biocontrol, Wilds emphasized that utilizing biocontrol has "great potential" and that it may be a solution to help manage unwanted pests under the condition that there has been extensive research, lab and field testing, and controlled releases. He emphasized that extensive research should consider every possible factor that could potentially result in negative impacts, especially to other endemic taxa. He also stressed that public education should be a key component in this process, as it will create opportunities for the public to learn and provide input. He believes that public input can help assess the possible risks and identify steps to manage those risks. Wilds strongly recommended that all future biological control efforts integrate public input and that it should move towards a community-based resource management structure. Wilds suggested that ways to promote biocontrol are through responsible action, extensive and evidence-based testing and research, and if these pre-release efforts are successful, biocontrol "can be the silver bullet" to managing pests. He concluded that although the process has potential to control invasive species, the idea and use of the word "control," as opposed to "management," is very loaded and attaches unrealistic expectations to the effort. As with any forest, Wilds believes that with proper "management", the results will net a positive cultural impact. New forest growth produces more flowers and seed and ultimately creates more opportunities for people to interact with these forests

through place-based learning. He emphasized that when people interact and participate in caring for our “beloved” resources and when the *mo‘olelo* of these resources are shared, it can then become a living cultural resource for the people.

### **MIKE DEMOTTA**

On April 24<sup>th</sup>, 2019, Lokelani Brandt conducted an interview with Mike DeMotta, the Head Curator of the living collections for the National Tropical Botanical Gardens (NTBG) on Kaua‘i. Mike manages the center’s plant inventory database, which includes a large collection of native plants. He has also been tasked with developing ways to improve their native plant populations by creating spaces for a thriving living collection. Through his work, Mike has been heavily involved with native plant restoration from the coastal dry areas on Lehua Island to the pristine native forests in Limahuli Valley on Kaua‘i’s north shore.

When asked about any traditional cultural uses of the *Miconia*, Mike stated that he was unaware of any cultural importance or uses for any part of this plant. He went on to explain that *Miconia* is incipient on Kaua‘i and has been carefully monitored and controlled by the island’s invasive species committee. He explained that these early monitoring efforts have prevented mass spreading of this highly invasive plant.

When asked about whether any potential cultural impacts could result from the use of biocontrol, Mike believes that with proper research, biocontrol could preserve or rescue native forests. With his strong involvement with restoration, Mike strongly believes biocontrol will assist in opening up spaces for the regeneration of native forests and proposed that drastic measures are imperative to control or eradicate the aggressive nature of invasive species. Although he is genuinely concerned about the possibility of a collateral loss of one or two native species, Mike reasoned that the overwhelming threat to native forests from invasive species had lent to his advocacy for biocontrol. He argued that the manpower needed to control these threats are not feasible and are unrealistic. He is particularly pleased that the focus has shifted to conservation and that there is a growing awareness that we are losing pristine forests to these invasive species.

### **JEN LAWSON AND ROBERT YAGI**

On April 26, 2019, Lokelani Brandt and Aoloa Santos met with Executive Director, Jen Lawson and Preserve Manager, Robert Yagi, of the Waikoloa Dry Forest Initiative. The Waikoloa Dry Forest Initiative manages 275 acres of dryland forest located near the Waikoloa community. When asked about any known cultural uses of *Miconia*, Jen and Robert were not aware of any known past or current uses of this plant although they were aware of the past and ongoing efforts to control this plants spread. While no specific information about *Miconia* was obtained, they did offer their insights into the proposed use of biological control to aid in management strategies.

Although Jen is a proponent of biocontrol, she explained that the proper research must be conducted and that dissemination of that research should be provided to the affected communities. She expressed that one of the main challenges will be garnering public support for the proposed action because of preconceived notions that are heavily influenced by the historical and unsuccessful application of biocontrol. Although Jen was aware of the extensive research that is conducted prior to the release of any biocontrol agent, she remarked that such research is not always effectively shared with the communities. She added that the lack of public information and transparency only exacerbates misconceptions thereby making community support difficult to establish. In light of this, Jen recommended that DOFAW and other associated agencies restructure informational public meetings to be engaging and inclusive of community input as she believes this may improve trust between the affected communities and the agencies. Additionally, she strongly advocates for a more collaborative partnership between the DOFAW and its agencies as a way to promote a more open dialogue between the agencies and community groups who work closely with some of these invasive species. Jen and Robert also recommended that more consistent post-release monitoring be conducted and that such efforts should be done in conjunction with established community groups.

### **FOREST AND KIM STARR**

On May 31<sup>st</sup>, 2019, Lokelani Brandt and Aoloa Santos met with Forest and Kim Starr at their home in Olinda, Maui. Born and raised on Maui, Forest always enjoyed nature. He later moved to New York to attend Cornell University and in 1992 met his now wife and business partner, Kim, who is of Hawaiian descent but was *hānai* (adopted and raised) by a Japanese-Italian family. Since then they have done numerous volunteer and contract work in the conservation field. They currently co-own Starr Environmental and serve as biologists and environmental consultants for developers and federal and state agencies. Forest and Kim have extensive experience in botanical and

environmental restoration work in the Hawaiian Islands. Forest shared that they have assisted in prior biocontrol releases but they primarily focus on the early detection of introduced species.

When asked about any known cultural uses of *Miconia*, Forest and Kim stated they are not aware of any cultural uses of this plant other than its use as an ornamental. They both expressed that this plant is highly invasive in Hawai‘i because there are no natural predators. Additionally, Hawai‘i’s wet environmental conditions create the ideal environment in which this plant can thrive and maintain its invasive characteristic. Forest stated that *Miconia*, which is known to grow in the wetter regions of the islands, may impact native foliage such as the *olonā* (*Touchardia latifolia*), a plant known to be used in making traditional fibers and cordage.

Forest described much of the vegetation that dominates the islands as a “rag-tag assemblage of pantropical invasive species” and opined that this sort of global homogenization of the islands’ plant life is exacerbating the spread of really aggressive species. Adding to this, Forest expressed that changes in the environment are inevitable and noted that these changes are difficult for many to accept. Forest and Kim believe that biocontrol is a method that can help mitigate or slow the growth of species but “it never eradicates, it just reduces the numbers” and cited the example of the EGW and the panini cactus (*Opuntia ficus-indica*) which have had biocontrol agents released against them. Both Forest and Kim explained that over a course of many years they have seen limited success rates where biocontrol has resulted in complete eradication, which they shared is a common outcome.

When asked about their thoughts on the cultural appropriateness of biocontrol, Forest and Kim shared that they have witnessed the culture and traditions of these islands evolve within an inevitable changing environment. Forest emphasized that the mixed-culture of Hawai‘i has been able to co-exist with the changing environment and they have seen various cultures including Hawaiian culture utilize introduced plants in place of rare or extinct native plants in order to perpetuate their traditional cultural practices. In spite of these cultural adaptations, they feel that biocontrol can be useful in protecting native plant habitats which are both ecologically and culturally important and remain open-minded to these types of undertakings.

Based on their knowledge of the efficacy of former biocontrol efforts, Forest and Kim shared that generally, the way a biocontrol agent is introduced is not very effective and that for the most part, in order for the biocontrol to be entirely successful a large number of biocontrol agents must be introduced. Kim stated that although the purpose of biocontrol is to introduce an organism that is specific to a target plant, the efficacy is oftentimes underwhelming and as a result, there have been a few unintentional consequences. Kim shared that although biocontrol agents are introduced with good intentions, “the unknown,” meaning its potential to cause unforeseen impacts to a non-target species is the main factor that contributes to the general resistance to implement biocontrol. Additionally, Forest and Kim both stated that once a biocontrol agent is released there is very limited and often times no follow-up by the agencies that have invested in the pre-release studies. In light of this, Forest and Kim recommended that post-release monitoring should be held to the same standard as the pre-release of a biocontrol agent. Forest described that “mother nature is so crafty” and that changes are often muted or other factors become more significant than the release, therefore on-going post-release monitoring is a crucial component to this process. Forest also stated that misinformation has been detrimental to these biocontrol efforts and believes that more should be done to effectively communicate these types of undertakings to the public.

## MANAIKALANI KALUA

On June 6<sup>th</sup>, 2019, Lokelani Brandt conducted an interview with Manaiakalani “Manai” Kalua, a *kumu hula* and life-long Hawaiian cultural practitioner. Born and raised in the Hawaiian homestead community of Keaukaha, Manai has dedicated his life to *hula* and because of this, he has had extensive interactions with Hawai‘i’s native plant life, which is a fundamental element to traditional *hula* practices.

When asked about any known cultural uses for *Miconia*, Manai stated that he was not aware of any cultural uses of this plant but expressed that this plant is highly invasive and has taken over areas where he used to gather other plants for ceremonial and other cultural uses. He described collecting ‘*ohe* (bamboo) in the Honoli‘i area (South Hilo District, Island of Hawai‘i), which is now overgrown with *Miconia*. He described a time when he used to collect ‘*ohe* and saw a few *Miconia* plants. Later, when Manai returned to the area, he saw that someone had removed the *Miconia* but put the cuttings in a wood chipper and dispersed the wood chips back into the forest. Since then, he has observed even more *Miconia* growing in the area. He expressed that while this may have been an attempt at eliminating *Miconia*, the lack of knowledge to properly dispose of the plant has resulted in the spreading of this plant. He believes that there is still a lack of public understanding of how to properly dispose of invasive species.

Manai spoke at length about the ways in which invasive species are changing traditional cultural practices specific to *hula*. He explained that within his *hula hālau* he teaches about the proper way to harvest plants in addition to practices that will help limit the spread of invasive species. He now stresses the importance of cleaning all clothing,

equipment, and cars after every visit to the forest. He stated that invasive species are a serious problem that has major environmental and cultural implications and cited the example of Rapid 'Ōhi'a Death (ROD), which has significantly impacted *hula* practices. He noted that culturally, 'ōhi'a is an important part of *hula* adornments and rituals, since becoming aware of ROD, he no longer gathers 'ōhi'a nor does he condone the gathering of this plant. He explained that not being able to utilize 'ōhi'a has required him to be more creative with his cultural practices.

When asked about his thoughts on the cultural appropriateness of utilizing biocontrol, Manai explained that historically we have a long history of unsuccessfully utilizing biocontrol and cited examples including the introduction of the mongoose to control rats and the scale insect to control strawberry guava. Manai expressed concern for the idea of introducing other foreign insects which may adversely impact its intended target but whose impacts are somewhat unknown to the many other species that grow in the same habitat as the target species. He questioned, what will happen to the introduced biocontrol once the target species is eliminated, and what are the long-term impacts of utilizing biocontrol? He noted that we are still living with the repercussion of previous biocontrol choices that we still cannot manage. Although Manai is not a proponent of utilizing biocontrol, he understands that the shift to use biocontrol suggests that all other methods for controlling these invasive species have been exhausted. He was aware that utilizing biocontrol is a much slower process and stated that the government does not have the means to manually eradicate Hawai'i's invasive species. He stated that there are also risks associated with the manual removal of invasive species.

While Manai remains skeptical of the effectiveness of biocontrol, he believes that the government must develop stricter laws and policies to stop the introduction of invasive species. He noted that in his travels to other parts of the world, including Japan and New Zealand, their customs process is far more thorough and intensive. He believes that these countries are exemplary models where the emphasis is placed on stopping the introduction instead of trying to combat its spread. He also advocates for a more rapid response to known invasive species and cited the example of the coqui frog, which on Hawai'i Island is now so widespread and nearly unmanageable. He believes that rapidly responding to invasive species, especially when populations are far more contained, could be far more effective.

## DENNIS KANA'E KEAWE

On August 13, 2019, Aoloa Santos conducted an interview with Dennis "Kana'e" Keawe, a retired Commercial Services Consultant for Hawaiian Electric Light Company (HELCO) and former lecturer at the University of Hawai'i at Hilo (UH Hilo). Born and raised on O'ahu, Kana'e moved to Hawai'i Island in November of 1974, to help his father with his coffee farm in Hōnaunau, Kona. Following his retirement from HELCO at age 55, he was asked to teach a Hawaiian studies ethnobotany course at the UH Hilo. Kana'e stated that when he was asked to teach the course, his botanical vocabulary and knowledge was appropriate for teaching young children and therefore acknowledged that in order to instruct at the university level, he needed to expand and develop his botanical nomenclature. Through this process, Kana'e learned that many varieties of Hawai'i's native plants "exists within the tropical belt around the world" and by having in-depth knowledge of scientific names and identifiers allowed him to effectively communicate with people well-versed in similar plants of those regions. Additionally, Kana'e is a renowned Hawaiian artisan and cultural practitioner endearingly referred to by many as "the all-around guy." He has been recognized for his expert-crafted oeuvres, such as *hula pahu* (drum), *kapa* (bark cloth), *i'e kuku* (*kapa* beater), and feather crafts. As a result of his artisanship, he has been afforded opportunities and invitations to visit communities and institutions around the world, notably the Smithsonian Museum, an institution that houses a large collection of Hawaiian antiquities.

When asked about any traditional cultural uses of the *Miconia*, Kana'e stated that he was unaware of any cultural importance or uses for any part of this plant but shared that "the wood of the *Miconia* is hard enough to perhaps be of utilitarian purposes to be utilized to make primary *kapa* beaters." While no specific information about any known past or current cultural uses of this plant was shared, he did offer thoughts on the use of biocontrol. Kana'e expressed his support and did not foresee any major cultural impacts if extensive studies and testing is done prior to its release. He added that although there are unknown variables to this method, humans can only do so much, especially in the current state of our environment and the rapid growth of invasive species.

## ILIAHI ANTHONY

On September 3<sup>rd</sup>, 2019, Lokelani Brandt interviewed Iliahi "Ili" Anthony, a *hula* dancer, *lauhala* weaver, *lei* maker, and natural dye expert. Ili is also an art teacher at Ka 'Umeke Kā'eo Hawaiian Immersion Public Charter School and has a background in designing furniture and exhibit spaces. Ili grew up in the community of Keaukaha and has been dancing *hula* since the age of four. As a life-long *hula* dancer for Hālau O Kekuhi, Ili explained that her knowledge of Hawai'i plant life comes from years of gathering foliage (primarily indigenous and endemic species) and other natural resources for their 'a'ahu (costume), *lei*, and *hula* implements. Ili recalled as a child being accompanied by her *kumu hula* and family members into their gathering areas where they taught her about the Hawaiian cultural significance of the plants, gathering protocols, how to identify them in the forest, and how to sustainably gather and

prepare them to be used in the context of *hula*. She emphasized that as a small kid, she learned about these practices by watching and listening to her *kumu* and relatives and stated that when you are that young, you're not keenly aware of what it is they are teaching you, but as an adult, those teachings remain and are better understood. Ili openly stated that although she is not of Hawaiian ancestry, she has been raised by native Hawaiians and has learned about many of the traditional practices and customs. She expressed that although she chooses to remain respectful when it comes to Hawaiian issues and matters, she is willing to share her knowledge when asked and feels that she has something to offer.

Ili explained that as a *hula* dancer, she has learned to depend on other cultural practices to help her with gathering certain natural resources needed in *hula*. She described going on expeditions with her brother, who is a hunter, to gather *maile*. Ili explained that her brother knows the trails very well and is very particular about how they cut *maile*, and how much they take from any one plant. She added that although her brother is not necessarily a *lei* maker, he knows this plant and forest resources very well. She explained that she also relies on her father who is a woodcarver to help her make certain *hula* implements. Ili also described gathering with other *hula* dancers, some of whom have a background in native plants and botany, and shared that when she gathers with them, they often teach her about the names and can point out the subtleties that are not obvious to her. Ili believes that this demonstrates the interconnectedness of cultural practices and stated that even people who we think may not use plants, such as hunters and fishers, do often know a lot about native plant life. She stressed that as a *hula* practitioner and in terms of plant resources, she relies greatly on other practices that are not necessarily defined as *hula*.

With respect to learning about and identifying plants, whether native or non-native, Ili shared that unless someone shares that knowledge with her, then she would most likely not know about it. She expressed that when she has gone to get gathering permits from DLNR, she recalled seeing various informational posters in their office which she finds useful for learning about Hawai'i's plant life and invasive pests.

With respect to *Miconia*, Ili explained that she has encountered this plant while gathering *lauhala* in Puna but was not familiar with any cultural uses for this plant. Based on her observations and recollections, Ili believes that *Miconia* is often found in the lower elevations and made reference to the Pahoia area in the Puna District. She shared that *Miconia* is a very strong and resilient plant and wonders if there are other uses for this plant that have not been discovered?

While Ili supports the removal of invasive species, especially if they are directly impacting native plants or native plant habitat, she cautioned that some plants that have been dubbed "invasive" are utilized for various traditional and contemporary cultural purposes. Ili opined that today, people utilize various "rubbish plants" to make adornments such as *lei* and that such plants if properly arranged can be turned into something beautiful and wearable. She also noted that weedy plants such as *laukahi* (*Plantago major*) and the introduced guava (*Psidium guajava*) have become incorporated into Hawaiian *lā'au lapa'au* (plant healing) practices. While she believes that finding a cultural purpose for an invasive plant is not a strong reason to halt invasive species management efforts, she cautioned that people have come to rely on certain invasive species to perpetuate select cultural practices because they are easily accessible and abundant. Adding to this, Ili expressed that people have and will continue to adapt to living with invasive species. Ili also worries that if invasive species, particularly those that are used for cultural purposes become less abundant and available, then people will likely have to find a more readily available substitute, which could result in people gathering indigenous or endemic species. She stated that people tend to use invasive species because they are abundant and easily accessible.

Ili shared that over the years she has observed an increasing number of pests on native plants and made specific reference to '*a'ali'i* (*Dodonaea viscosa*), which now seems to be infested with spiders. She shared that as a *lei* maker, she often brings these plants into her home and disposes of her *hakina* (scrap pieces) in her yard. Although she has not seen those spiders move onto the plants at her home, Ili expressed a sense of uncertainty with gathering and possibly transporting unknown pest.

Ili also spoke about the need to improve our understanding of the ecological relationships that may exist between native and non-native species. She shared that some native plants such as '*iliahi* (sandalwood; *Santalum ellipticum*) is semi-parasitic and relies on a host plant to thrive. She added that we know that native plants have adapted to each other and wonders if native species may have adapted or are adapting to living amongst non-native species as well. She pondered on the idea of removing invasive species and the possibility of causing indirect impacts to native species that have come to rely on them for some life-giving element.

When asked about her thoughts on the cultural appropriateness of using biocontrol, Ili opined that this is a difficult question to answer and lightheartedly stated that "basically, you're introducing another culture into the culture." She asked, what things have we introduced in the past that actually worked? Ili added that she feels there have been more things in the past that have been introduced that haven't worked in comparison to those that have actually worked. Ili

stated that introducing more foreign species to the islands is a scary thought and wondered what the future would look like. She asked, will we have to continually introduce more foreign species to combat those we previously introduced? Additionally, she wondered what would take the place of these invasives once they are removed?

When asked about her thoughts and recommendations about the proposed action, Ili believes the state could do more in terms of educating the public about identifying invasive species and the ways in which everyone can help limit the spread. She stated that there is a general lack of awareness and believes that providing more information to those who are obtaining gathering permits may be one way to improve awareness. She stressed that the information needs to be presented in a reasonable manner that would not deter people from obtaining a gathering permit. Ili shared that since the events taking place on Mauna Kea, she believes there is growing alertness amongst the people about land and culture-related issues. She has noticed an increasing awareness in schools where teachers are working with students to better understand and to seek solutions to these issues. She believes that the state should improve support to the schools so that the information is more accessible to students and teachers. Ili explained that many teachers want to do more of these kinds of projects with their students but there are many challenges that hinder their ability to execute such projects, including accessibility, funding, time, and finding a good resource person that can connect them to specific places and resources. She expressed that teachers can only guide and facilitate these kinds of projects, but they are not plant experts. She believes that education can be a key component in improving public awareness. She also added that while there may be a robust amount of scientific information about the potentially positive aspects of biocontrol, it needs to be condensed and expressed in layman's terms so that the general population can actually understand and connect to what scientists are discovering. She lamented that otherwise, people won't listen or hear what is being said because they can't connect to or understand what the scientists are saying. Ili made reference to the tremendous educational efforts that were put into improving public awareness about Rapid 'Ōhi'a Death and noted that their outreach team was doing big and small things such as community talks, stickers, hats, and being present at various local community events. She believes that more of these kinds of efforts could be undertaken for other invasive species.

Ili also shared that many scientists are not practitioners and opined that these two groups, although they may share an affinity for preserving plants, both have two completely different relationships with the resource. She believes that the relationship between scientists and practitioners should also be improved because both groups can help to elevate and improve each other's practices if they are willing to work collaboratively. While she feels that this dynamic has been changing, she thinks it's especially important as we move towards the possibility of using biocontrol in native plant habitats.

## 4. IDENTIFICATION AND MITIGATION OF POTENTIAL CULTURAL IMPACTS

The OEQC guidelines for assessing cultural impacts identify several possible types of cultural practices and beliefs that are subject to assessment. These include subsistence, commercial, residential, agricultural, access-related, recreational, and religious and spiritual customs. The guidelines also identify the types of potential cultural resources associated with cultural practices and beliefs that are subject to assessment, which "may include traditional cultural properties or other types of historic sites, both man made and natural, including submerged cultural resources"(Office of Environmental Quality Control (OEQC) 1997:1). The origin of the concept of traditional cultural property is found in National Register Bulletin 38 published by the U.S. Department of Interior-National Park Service (Parker and King 1998). A traditional cultural property can be generally defined as:

...one that is eligible for inclusion in the National Register because of its association with cultural practices and beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. (Parker and King 1998:1)

This definition also implies that any identified traditional practices and beliefs of an ethnic community, or members of that community, exceeds fifty years. "Traditional" as defined in the National Register Bulletin 38 "refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practices (ibid.). Whereas, "Culture" refers to "a system of behaviors, values, ideologies, and social arrangements" in addition to "tools and expressive elements such as graphic arts" (ibid.). The use of the term "Property" defines this category of resource as an identifiable place. Traditional cultural properties are not intangible, they must have some kind of boundary; and are subject to the same kind of evaluation as any other historic resource, with one very important exception. By definition, the significance of traditional cultural properties should be determined by the community that values them.

It is however with the definition of “Property” wherein there lies an inherent contradiction and corresponding difficulty in the process of identification and evaluation of potential Hawaiian traditional cultural properties because it is precisely the concept of boundaries that runs counter to the traditional Hawaiian belief system. The sacredness of a particular landscape feature is often cosmologically tied to the rest of the landscape as well as to other features on it. To limit a property to a specifically defined area may actually partition it from what makes it significant in the first place. However offensive the concept of boundaries may be, it is nonetheless the regulatory benchmark for defining and assessing traditional cultural properties. As the OEQC guidelines do not contain criteria for assessing the significance for traditional cultural properties, this study will adopt the state criteria for evaluating the significance of historic properties, of which traditional cultural properties are a subset. To be significant the potential historic property or traditional cultural property must possess integrity of location, design, setting, materials, workmanship, feeling, and association and meet one or more of the following criteria:

- a Be associated with events that have made an important contribution to the broad patterns of our history;
- b Be associated with the lives of persons important in our past;
- c Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; or possess high artistic value;
- d Have yielded, or is likely to yield, information important for research on prehistory or history;
- e Have an important value to the native Hawaiian people or to another ethnic group of the state due to associations with cultural practices once carried out, or still carried out, at the property or due to associations with traditional beliefs, events or oral accounts—these associations being important to the group’s history and cultural identity.

While it is the practice of the DLNR-SHPD to consider most historic properties significant under Criterion d at a minimum, it is clear that traditional cultural properties by definition would also be significant under Criterion e. A further analytical framework for addressing the preservation and protection of customary and traditional native practices specific to Hawaiian communities resulted from the *Ka Pa’akai O Ka ‘Āina v Land Use Commission* court case. The court decision established a three-part process relative to evaluating such potential impacts: first, to identify whether any valued cultural, historical, or natural resources are present; and identify the extent to which any traditional and customary native Hawaiian rights are exercised; second, to identify the extent to which those resources and rights will be affected or impaired; and third, specify any mitigative actions to be taken to reasonably protect native Hawaiian rights if they are found to exist.

#### **Summary of Culture-Historical Background, Consultation**

A review of the culture-historical background information reveals that *Miconia* was introduced to the Wahiawa Botanical Gardens on the island of O’ahu in 1961 as a garden ornamental. Between 1961 and the 1970s, the plant was distributed to other gardens on O’ahu including the Waimea Botanical Gardens on O’ahu’s north shore and at the Harold L. Lyon Arboretum in Mānoa Valley, but was not widespread. During this time, *Miconia* was also reported at the estate of Herbert Shipman in Hilo on Hawai’i Island. By the 1970s isolated populations of *Miconia* had become naturalized on the island of O’ahu, Maui, and Hawai’i. Despite warnings given between 1975-1983 to government officials about the plant’s potential to invade Hawai’i’s wet forest habitat, several individual specimens were destroyed but no major efforts were undertaken to prevent the plant’s spread. By the 1990s, *Miconia* had become aggressively abundant on Maui and Hawai’i islands and to eradicate and contain existing populations “Operation Miconia,” a concerted statewide effort, was officially launched. Public education and awareness about the impacts of *Miconia* to Hawai’i’s wet forest habitat garnered public attention and support. Despite these efforts, *Miconia* is still found on four of the major Hawaiian Islands, namely Kaua’i, O’ahu, Maui, and Hawai’i. Of the four islands, *Miconia* infestation is most extensive on Hawai’i Island and it has been estimated that this plant covers some 250,000 acres.

#### **Identification of Cultural Impacts and Proposed Mitigation Measures**

Although *Miconia* has existed in the Hawaiian Islands for more than fifty years, there are no recorded cultural uses for this plant, other than it being used as an ornamental. While horticulturalist and plant collectors are known to favor this plant for its unique qualities, there is no historical evidence to suggest that *Miconia* is crucial to any particular ethnic groups’ cultural history, identity, practices, or beliefs, nor does it meet any of the significance criteria outlined above. Although *Miconia* does not meet any of the significance criteria, what is culturally significant is the wet forest habitat in which it thrives. Hawai’i’s wet forest habitat could be considered significant as a traditional cultural property under Criterion e, as it contains many culturally important indigenous and endemic taxa, which are still utilized in

certain Hawaiian cultural practices. Some of these wet forest resources are also associated with certain Hawaiian cultural beliefs.

Based on the information presented in the culture-historical background and from the insights shared by the consulted parties, it is the assessment of this study that the release of the proposed biological control agent, *Euselasia chrysippe* will not result in impacts to any valued cultural, historical, or natural resources. Conversely, if no action is taken to further reduce remaining populations of *Miconia* from claiming more of Hawai'i's wet forest habitat, then impacts to this valued resource would be anticipated.

While no specific cultural impacts have been identified, the consulted parties shared valuable insight, concerns, and recommendations that could reduce the potential for any future impacts and improve public transparency regarding the effectiveness of biocontrol as a conservation management strategy. Several key themes emerged from the consultation efforts, all of which are further described below:

- 1) maintain stringent pre and post-release testing and monitoring;
- 2) improved community transparency and input;
- 3) active and ongoing public outreach and education;
- 4) improve efforts to limit the introduction of potentially harmful invasive species.

While the consulted parties did not explicitly oppose the use of biocontrol, especially to aid in the recovery of Hawai'i's native forest habitat, they all shared a sense of concern and spoke about the risks inherent in biocontrol activities. While they were all aware of the extensive studies that are conducted prior to the release of any biocontrol agent, they all spoke about the uncertainty of introducing another foreign insect to Hawai'i's fragile ecosystems. Several of the consulted parties noted that although pre-release host specificity test helps with the screening process, they shared that laboratory testing cannot account for all the variables found in nature. The generally held belief is that field release is merely another screening and testing procedure. Despite this element of uncertainty, all of the consulted parties agreed that some sort of action is necessary to limit the growth and spread of *Miconia*. Nearly all of the consulted parties stressed the importance of thorough controlled pre-release studies to safeguard against the potential for the collateral loss of other endemic taxa or economically valuable crops. Several of the consulted parties also stressed the importance of conducting on-going and consistent post-release monitoring to ensure that the biocontrol agent does not spread beyond its intended target. These individuals noted that consistent post-release monitoring will help with early detection if it is found that the proposed biocontrol agent has unintentionally spread beyond the host plant. Wild Brawner suggested the concept of integrated pest management, particularly for native plants, where natural and cultural management practices are employed concurrently. Examples of this include, timing weed removal and planting companion plants to attract active pollinators or insects that may combat other invasive insects.

In looking to future biocontrol efforts, nearly all of the consulted parties expressed the need to integrate more public input and stressed the importance of moving towards a community-based resource management structure. Based on the past public meetings held by HDOA for biocontrol, Jen Lawson felt that the public meetings held by the HDOA should be restructured so that they are engaging and inclusive of community input as she believes this may improve trust between the affected communities and the agencies. Jen Lawson and Iliahi Anthony believe that supporting biocontrol research must be clearly and effectively communicated to the public using various media forms. Iliahi Anthony noted that education and outreach are key components to improve the public's understanding of biocontrol and empowering them with the knowledge and tools to help limit the spread of invasive species. Both Jen Lawson and Iliahi Anthony expressed that improving the public's understanding of the risk and benefits of biocontrol may help to build public transparency and hopefully resolve some of the misconceptions associated with biocontrol. Jen Lawson encourages the responsible agencies to consider partnering with conservation-focused non-profit organizations and community groups, especially during the field release monitoring phase as these groups are working directly with these target species daily. As noted by Kim and Forest Starr, the conventional biocontrol release methods that have been used in the past typically yields results that are underwhelming. Perhaps, the additional support from non-profit organizations could potentially improve the efficacy of biocontrol.

All of the consulted parties spoke about the many misconceptions associated with biocontrol, many of which are based on failed historical examples. While testing and screening procedures have improved significantly since the late 19<sup>th</sup> century, many people today remain resistant and skeptical to implement biocontrol. It is the author's contention and as described by some of the consulted parties that this widely held belief stems from the agencies' lack of public outreach and education. In light of this, it is imperative that DLNR, DOFAW, and HDOA make serious efforts to participate in public outreach events and to educate the public so that these misconceptions, some of which are rooted in a historical context, can be better understood. Public outreach and education efforts should also demonstrate the potential effectiveness of biocontrol as a conservation management strategy. Iliahi Anthony spoke about the

#### 4. Identification and Mitigation of Potential Cultural Impacts

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effectiveness of the Rapid 'Ōhi'a Death (ROD) community outreach efforts and believes that this could be an exemplary model. Iliahi Anthony noted that the ROD outreach team has been actively disseminating information using various media forms.

While combatting existing populations of invasive species is a critical step in managing Hawai'i's natural resources, it was noted by Manaiakalani Kalua that the State of Hawai'i must also ramp up their efforts to prevent the arrival and introduction of unwanted pest species. Manaiakalani Kalua believes that current policies and laws must be revised and strengthened. Both Manaiakalani Kalua and Iliahi Anthony noted that in their travels to other countries their customs entry process is far more rigorous and thorough. Manaiakalani Kalua believes that the State should look to other countries such as New Zealand and Japan as models to prevent the arrival of unwanted pests.

In summary, the recommendations provided above are intended to ensure that the release of *E. chrysippe* as a biocontrol agent for *Miconia* considers the culture-historical context and the concerns and thoughts shared by the consulted parties. While none of the consulted parties explicitly opposed the use of biocontrol, the concerns, and recommendations offered above are intended to support the State of Hawai'i in being mindful of the cultural, social, and environmental uniqueness of Hawai'i. Conducting background research, consulting with community members, and taking steps towards mitigating any potential cultural impacts is done so in the spirit and practice of *Aloha 'Āina*, a contemporary movement founded on traditional practices and beliefs that emphasize the intimate relationship that exists between Native Hawaiians and the *'āina* (land). If DLNR, DOFAW, and HDOA assume ownership of their right and responsibility to release a biocontrol agent, we recommend it be done so in that same spirit and practice. Attention to and implementation of the above-described issues and measures will help to ensure that no such resources, practices, or beliefs will be adversely affected by the proposed release of *E. chrysippe*.

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**APPENDIX A.**  
***KA WAI OLA* PUBLIC NOTICE**

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### **PUBLIC NOTICE**

ASM Affiliates is preparing a Cultural Impact Assessment (CIA) in advance of a proposed statewide release of four (4) biological control (biocontrol) agents for four target invasive species. In brief, DOFAW is seeking to conduct a statewide field release of four (4) separate biocontrol agents on four target species:

- introduction of a wasp parasitoid (*Aprostocetus nitens*) to further control the erythrina gall wasp (*Quadrastichus erythrinae*), which has been impacting the native *wiliwili* (*Erythrina sandwicensis*);
- introduction of a small beetle (*Syphraea uberabensis*) to control weedy melastomes (*Tibouchina* spp.);
- introduction of a thrips insect (*Pseudophilothrips ichini*) to control Christmas berry (*Schinus terebinthifolia*);
- introduction of a butterfly (*Euselasia chrysippe*) to control miconia (*Miconia calvescens*).

We are seeking consultation with any community members that might have knowledge of traditional cultural uses or who are involved in any ongoing cultural practices associated with the target species (i.e. *wiliwili*, melastomes, Christmas berry, and miconia). If you have and can share any such information please contact Lokelani Brandt lbrandt@asmaffiliates.com, or Aoloa Santos asantos@asmaffiliates.com, phone (808) 969-6066, mailing address ASM Affiliates 507A E. Lanikaula Street, Hilo, HI 96720.

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(Ka Wai Ola 2019:21)

## **Appendix C: Comments Received During Draft Environmental Assessment Public Comment Period**

Twenty-three letters of correspondence were received during the 30-day public comment period for release of *E. chrysippe* for the biological control of miconia. All letters supported the release of *E. chrysippe*, and therefore no changes were made to the draft EA in the composition of the FEA.

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Friday, April 24, 2020 5:54:16 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvenscens)
<b>Name</b>
Shelley Gustafson
<b>Email</b>
<a href="mailto:shelley.gustafson@hawaii.edu">shelley.gustafson@hawaii.edu</a>
<b>Address</b>
3190 Maile Way Honolulu, Hawaii 96822 <a href="#">Map It</a>
<b>Comments/Questions</b>
I support the proposed release of Euselasia chrysippe for biological control of Miconia calvenscens in Hawaii. Miconia calvenscens is a severe threat to Hawaii's native forests, and has already modified habitats on a landscape scale in certain areas of the state. We need to act quickly to keep this from happening throughout our islands. The use of biological control is an important part of the overall strategy to mitigate the impacts of Miconia calvenscens on our native forests.
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>No</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Friday, April 24, 2020 3:55:19 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Mark Wright
<b>Email</b>
<a href="mailto:markwrig@hawaii.edu">markwrig@hawaii.edu</a>
<b>Address</b>
University of Hawaii at Manoa 3050 Maile Way Honolulu 96822 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
I strongly support the proposal to release Euselasia chrysippe for the biological control of Miconia in Hawaii. The data presented show that there is a very low, essentially negligible, probability of any potential negative impacts, while a very high likelihood for beneficial impact (reduction in Miconia fitness) is expected.
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• Yes</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Tuesday, April 28, 2020 6:00:02 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Fern Duvall
<b>Email</b>
<a href="mailto:fern.p.duvall@hawaii.gov">fern.p.duvall@hawaii.gov</a>
<b>Address</b>
Hawaii DLNR Division Forestry & Wildlife 685 Kahului, HI 96732 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
<p>Comments pertain to the Draft Environmental Assessment. examining a butterfly Euselasia chrysippe that could help manage invasive Melastomataceae especially Miconia calvescens in Hawai'i forests.</p> <p>I have read the EA and wish to very strongly support the proposed release of this biocontrol as outlined. I send this support as the Chair of the Maui invasive species and as a biologist that is familiar with the issues surrounding the invasive miconia (more than 37,000 acres on East Maui) and melastome invasions of Maui. It is my hope that they caterpillars will also feed on Clidemia hirta (Miconia crenata) if only to a lesser extent, and perhaps moreso where the latter is more prevalent than Miconia calvescens. Any loss of the biomass is welcomed in the areas currently infested by the melastomes. Thank you for your work on biocontrol for Hawai'i.</p>
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• Yes</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Thursday, April 30, 2020 3:03:38 PM

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You've got a new comment:

<b>Comment on a Project</b>
General/Other
<b>Name</b>
Brooke Mahnken
<b>Email</b>
<a href="mailto:brookemahnken@gmail.com">brookemahnken@gmail.com</a>
<b>Address</b>
PO Box 791921 Paia, HI 96779 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
The general public is notoriously miseducated about modern biocontrol. Please follow the recommendations of the expert biologists and members of the conservation community. Asking for public input without adequate outreach/education is a slippery slope. I would not consult my mechanic on a medical condition; I would ask my doctor. Do what is pono and stick with the experts
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>No</li></ul>

Clifford Smith [cliff@hawaii.edu](mailto:cliff@hawaii.edu)

Good morning:

This is a good analysis of the potential environmental consequences of releasing this potential biocontrol agent against *Miconia*. The added benefits against other melastomes is salutary.

Excellent. I encourage the state to proceed as rapidly as possible.

Clifford Smith  
Emeritus Professor in Botany

?

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On Thu, Apr 23, 2020 at 3:53 PM Cullison, James A <[james.a.cullison@hawaii.gov](mailto:james.a.cullison@hawaii.gov)> wrote:  
Aloha Mr. Smith,

Attached is a letter regarding the **Draft** Environmental Assessment for the proposed field release **of** the miconia butterfly (*Euselasia chrysippe*) for biological control **of** miconia (*Miconia calvescens*) in Hawaii. Mahalo for your interest during early consultation, and if you have any questions please feel free to let us know!

Mahalo,

Andy Cullison  
Hawaii Island & Forest Health Planner  
Hawaii Division **of** Forestry & Wildlife  
(808) 436-8122  
<https://dlnr.hawaii.gov/hisc/info/biocontrol/>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Thursday, April 30, 2020 3:32:09 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Adam Knox
<b>Email</b>
<a href="mailto:adamjknnox@gmail.com">adamjknnox@gmail.com</a>
<b>Address</b>
190 Hauoli Street Apt. 119 Wailuku, Hawaii 96793 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
<p>This natural enemy to Miconia calvescens is needed now more than ever. I support the release of this natural enemy and applaud the dedicated work of the career scientists who spent many years researching Euselasia chrysippe and going through the painstaking process of determining host-specificity to protect Hawaii's native flora and fauna from adverse impacts. Truly a commendable effort, as the EA shows. This will be a big win for the State of Hawaii (and invasive species science), and could be helpful in other parts of the world, like Tahiti, where miconia has ravaged large parts of the island. More resources should be put into natural enemy research to aid in the passive reduction of other invasive species in Hawaii and elsewhere. Likewise, more resources should also be put into the programs that actively work to get rid of invasive species, as our quality of life in the islands may hang in the balance if these pests are left to their own devices.</p>
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• Yes</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Thursday, April 30, 2020 2:28:44 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Carol Kwan
<b>Email</b>
<a href="mailto:carol@carolkwanconsulting.com">carol@carolkwanconsulting.com</a>
<b>Address</b>
PO Box 893953 Mililani, Hawaii 96789 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
I support the release of the proposed biocontrol agent for Miconia. I'm glad to see this new tool in the battle against Miconia!
Carol Kwan
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• Yes</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Sunday, May 3, 2020 7:52:59 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Paul Krushelnycky
<b>Email</b>
<a href="mailto:pauldk@hawaii.edu">pauldk@hawaii.edu</a>
<b>Address</b>
2718 Hlpawai Pl. Honolulu, HI 96822 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
I strongly support the release of Euselasia chrysippe to control Miconia calvescens. Miconia is one of the most damaging environmental weeds in Hawaii, and biological control is the only feasible methods of managing it at this stage. I am confident that the risks of unwanted detrimental impacts from releasing this agent are very low.
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• Yes</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Wednesday, May 6, 2020 5:12:07 AM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Nicole Lis
<b>Email</b>
<a href="mailto:nlis@hawaii.edu">nlis@hawaii.edu</a>
<b>Address</b>
525 W. Lanikaula Street, Hale Kauanoë Room #A106 Hilo, Hawaii 96720 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
<p>Invasive species on the Hawaiian islands pose a serious threat to native plant life, and the longer the issue is pushed off the more difficult it becomes to fix, both financially and ecologically. The miconia rapidly grows, shading out native forests, due to the lack of top-down control as a result of natural predators. Currently only high value sites are being mechanically and chemically controlled, but this temporary solution will not have a lasting impact on the ecosystem. Herbicides also have negative impacts, so biocontrol such as the introduction of a natural predator <i>E. chrysippe</i> could provide a safer, longer lasting solution. It is important to introduce <i>E. chrysippe</i>, as they would help diminish the effects of miconia by defoliating the broad leaves which block the sun from reaching native plants. The caterpillars can also lower reproduction of miconia, preventing spread of the noxious weed. Extensive studies have shown that the <i>E. chrysippe</i> are host specific, so they are not expected to feed on or harm other species. This shows that the caterpillars will target miconia by only foraging on that plant and its close phylogenetic relatives. Furthermore, field observations indicate that there are no significant negative impacts of the <i>E. chrysippe</i> on the environment. The native wet forest ecosystem has the potential to be saved from the noxious miconia if these caterpillars are introduced, and fast action will mitigate future expenses and damage that may become increasingly difficult to turn around.</p>
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>No</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Tuesday, May 5, 2020 2:29:53 PM

---

You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Ryan Coad
<b>Email</b>
<a href="mailto:rcoad@hawaii.edu">rcoad@hawaii.edu</a>
<b>Address</b>
PO box 6054 Hilo, Hawaii 96720 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
Aloha,  I've read through the Environmental Assessment for utilizing Euselasia chrysippe as a method of controlling the Miconia populations in Hawaii, and I support this movement wholeheartedly. Many methods of biocontrol in the past have had negative effects on our ecosystems, but the fact that Euselasia chrysippe is very specific about what its caterpillars predate on gives me confidence that this measure will not have detrimental effects. I hope that we can go forward with this method of biocontrol and that the affected ecosystems will experience the reprieve they deserve.
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• No</li></ul>

Christopher Kishimoto, Entomologist

HDOA PQ Branch

1849 Auiki St.

Honolulu, HI 96819

May 6, 2020

Patrick Conant

P.O. Box 1172

Volcano, HI 96785

Dear Mr. Kishimoto,

I am very pleased to see the Draft Environmental Assessment for the release of the biological control agent *Euselasia chrysippe*. I am a retired Entomologist that was engaged in very similar work over much of my career. The DEA was well written, not overly long and the tests performed in the work were all very thorough over a wide range of plant taxa. I am relieved to read that parasitoids of Riodinids butterflies are not shared with other Lepidoptera, so the risk of biotic interference is reduced.

With respect to host specificity of the larvae, Those results reported are also encouraging. The only 2 other plants in Hawaii (*Miconia crenata* and *Miconia bicolor*) that the larvae did well on are also invasive weeds in Hawaii. I see feeding on those weeds as a bonus, since virtually all the Melastomataceae in Hawaii are invasive, and some of them extremely so.

The family Melastomataceae should be prohibited from importation before yet more species are imported. The cost of suppression and containment of *M. calvescens* has been staggering for all infested islands for many years now. I have been involved in all aspects of it, and I started Sierra Club Service Trips to contain *Miconia* on Oahu back in about 1990. To me, biological control is the ultimate control method, but it is neither cheap nor rapid in deployment. It is much cheaper to prohibit potential pests from importation in the first place.

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Monday, May 11, 2020 6:06:55 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvenscens)
<b>Name</b>
Karl Magnacca
<b>Email</b>
<a href="mailto:knm956@gmail.com">knm956@gmail.com</a>
<b>Address</b>
709A Hualau Place Pearl City, Hawaii 96782 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
<p>I am writing to strongly support release of the butterfly Euselasia chrysippe for biocontrol of Miconia calvenscens. As a conservation biologist in Hawaii for over 25 years, I have seen the progressive deterioration of our natural environment, primarily due to invasion by alien plants and animals. Since the failed eradication effort on the Big Island several years ago, Miconia has been slowly expanding its numbers and range. With rapid ohia death currently devastating the remaining lowland native forests, it is poised to expand dramatically. It is therefore especially urgent that a control agent be released now before it becomes a problem on a scale like that of Tahiti. This butterfly has undergone extensive testing and does not appear to have any adverse effects; if anything, it has a frustratingly narrow host range given how many invasive melastomes we have with no native species.</p>
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• Yes</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Tuesday, May 12, 2020 3:46:23 PM

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You've got a new comment:

<b>Comment on a Project</b>
General/Other
<b>Name</b>
Harjaspreet Kaur
<b>Email</b>
<a href="mailto:hkaur4@hawaii.edu">hkaur4@hawaii.edu</a>
<b>Address</b>
9D Clinton street Delaware, New Jersey 07833 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
<p>The Miconia calvescens is one of the most invasive species that threatens native fauna in Hawaiian forest ecosystems. Its broad leaves prevent other plant species from obtaining sunlight needed for photosynthesis. This not only harms native species and can lower biodiversity, but also harms agriculture, horticulture, aquaculture, and livestock in Hawaii. The Miconia can spread quickly with each plant producing approximately 20,000 seeds per fruiting season, outcompeting species around it, and begin to form a monoculture if not controlled. So far, not much has been done to effectively control this species, especially in the long term or widespread. Biocontrol is a more effective way to mitigate the miconia population expansion that will last longer and cover more land. If Euselasia chrysippe is released, it will only forage on this species and its close relatives, since testing has already been done that indicates their low risk of non-target impacts. Furthermore, the Euselasia chrysippe is not expected to wipe out Miconia populations, and instead is expected to reduce population levels enough to provide enough room for sunlight to reach other species. Therefore, the Euselasia chrysippe would be an effective biocontrol that is essential to preserving native plant species and aiding agriculture.</p>
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• No</li></ul>

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Tuesday, May 12, 2020 7:29:21 PM

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You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Dakota Perry
<b>Email</b>
<a href="mailto:Dakotap@hawaii.edu">Dakotap@hawaii.edu</a>
<b>Address</b>
754 Park Ave Banning, California 92220 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
<p>I think that the use of Euselasia chrysippe is a good use because it has the chance to with the bio control of the invasive Miconia. Since the Miconia is not from the island the impact that it has to the native species is very problematic and bringing in a predator for the plants may cause other problems because we don't know how much of an impact it will have on the native species of the island. It is still a good way to try to control the plant species, but because there is no evidence of how it will impact the native species it would be good to start on a single island with a small group and closely monitor the problem within a small ecosystem. I will be keeping up with the biocontrol if it passes and I hope we can restore the beautiful islands of Hawai'i.</p>
<b>Do you wish to be notified during early consultation for future biocontrol projects?</b>
<ul style="list-style-type: none"><li>• No</li></ul>

**From:** [Kishimoto, Christopher M](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** FW: [EXTERNAL] support for Miconia biocontrol  
**Date:** Friday, May 15, 2020 7:42:15 PM

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**From:** J. B. Friday <jbfriday@hawaii.edu>  
**Sent:** Friday, May 15, 2020 3:53 PM  
**To:** Kishimoto, Christopher M <Christopher.M.Kishimoto@hawaii.gov>  
**Cc:** Danielle Frohlich <DFrohlich@swca.com>  
**Subject:** [EXTERNAL] support for Miconia biocontrol

Aloha Mr. Kishimoto,

I am writing to support the introduction of the butterfly *Euselasia chrysippe* for biocontrol for Miconia in Hawaii. I am extension forester with the University of Hawaii Cooperative Extension Service, and I work with landowners and managers of forests across the state. Miconia, like many woody invasive plants, has gone too far to be controlled manually with cutting and herbicides. It presents a clear danger to our wet forests based on its behavior elsewhere. Well-tested biocontrol measures such as this one are our only option for controlling the tree.

Sincerely,  
J. B. Friday

--

J. B. Friday, PhD  
Extension Forester

College of Tropical Agriculture and Human Resources  
University of Hawaii at Manoa

Komohana Research and Extension Center  
875 Komohana St.  
Hilo, HI 96720 USA

tel 808 969-8254

fax 808 981-5211

e-mail [jbfriday@hawaii.edu](mailto:jbfriday@hawaii.edu)

<https://cms.ctahr.hawaii.edu/forestry>

<http://www.rapidohiadeath.org>

<http://www.facebook.com/HawaiiForestryExtension>

<http://YouTube.com/HawaiiRREA>

<http://www.flickr.com/photos/jbfriday>

[https://www.instagram.com/james\\_b\\_friday/](https://www.instagram.com/james_b_friday/)

He Wa'a, He Moku: The island is a canoe. (We're all in this together).



## **MALAMA O PUNA**

**P.O Box 1467**

**Pahoa, Hawai'i 96778**

**(808) 965-2000**

www.malamaopuna.org \* malamaopuna@yahoo.com

*Protecting Hawai'i's precious natural heritage*

May 14, 2020

Hawai'i Department of Agriculture  
1849 Auiki St.  
Honolulu, HI 96819  
Attn: Christopher Kishimoto  
christopher.m.kishimoto@hawaii.gov

Aloha Mr. Kishimoto,

This letter is in reference to the Draft Environmental Assessment, Field Release of *Euselasia chrysippe* (Lepidoptera: Riodinidae) for Biological Control of Miconia, *Miconia calvescens* (Melastomataceae), in Hawai'i.

Malama O Puna is a 501(c)(3) environmental organization based in Puna, Hawai'i Island, and part of our mission is to protect native ecosystems. We have a long history with invasive species control and eradication efforts--having worked to control miconia and other weeds in native forests and taking on the eradication of red mangrove over the entire coastline of our island.

We support biological control whenever circumstances favor it. Biocontrol saves resources, human and material, because it is self-propagating and dispersing. Perhaps most significantly, biocontrol reduces our reliance on chemicals to fight invasions.

In the case of miconia and the proposed biocontrol agent, *Euselasia chrysippe*, there are a number of factors contributing to the likelihood of success:

- The family to which miconia and many other terrible weeds in Hawai'i belong, Melastomataceae, has no members that are native here. Therefore, there is less chance of a jump from miconia to a native species.
- There are no recognized benefits to miconia, other than the beauty of its foliage, but the foliage is only beautiful when the plants are small. When miconia forms a canopy it looks brown and unattractive, and severely limits what can grow beneath it. Therefore, the public is unlikely to object to control efforts.
- Miconia management has for years now been relegated to the status of hopeless on Hawai'i Island, due to the overwhelming populations present relative to the resources available for manual control, and the work becomes increasingly miserable as little fire ants spread.

- Results of trials with the proposed biocontrol agent *Euselasia chrysippe* demonstrate great promise of making a substantial impact on miconia's ability to grow and reproduce. The demonstrated impacts on *Tetrazygia bicolor* and, to a lesser extent, *Clidemia hirta* lead us to optimism that those species too will be controlled to a significant extent. Clidemia is one of the worst weeds that we have to deal with in Puna's lowland forests.

Malama O Puna is supportive of the proposed action for miconia biocontrol. We are convinced that adequate research and testing have been done to compel moving forward with the permitting and release of *Euselasia chrysippe*.

E Malama Pono,

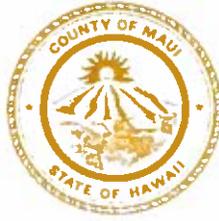
A handwritten signature in cursive script that reads "Ann Kobsa".

Ann Kobsa  
President

**MICHAEL P. VICTORINO**  
Mayor

**JEFFREY T. PEARSON, P.E.**  
Director

**HELENE KAU**  
Deputy Director



**DEPARTMENT OF WATER SUPPLY**  
COUNTY OF MAUI  
200 SOUTH HIGH STREET  
WAILUKU, MAUI, HAWAII 96793  
[www.mauiwater.org](http://www.mauiwater.org)

May 20, 2020

State Protection Forester  
1151 Punchbowl Street, Room 325  
Honolulu, HI 96813  
Attn: Ms. Kylee Wideman

**SUBJECT:** Draft Environmental Assessment (DEA) for the Proposed Field Release of *Euselasia chrysippe* for Biological Control of *Miconia Calvescens* in Hawaii

Dear Ms. Wideman,

Thank you for the opportunity to provide comments on the above-stated DEA.

The sustainability of the Department of Water Supply's (DWS) surface and groundwater sources depend on healthy watersheds. In recognition of this dependency, DWS continues to provide financial, water revenue funded, support to watershed projects in Maui County that combat threats to our upper watersheds.

For over 20 years, DWS has provided grant subsidies to Maui Invasive Species Committee (MISC) and East Maui Watershed Partnership (EMWP) to contain *miconia calvescens* (miconia) in the East Maui watershed. Together, EMWP and MISC are committed to using best management practices and adopting innovative approaches, such as the utilization of herbicide ballistic technology (HBT), which was pioneered in the Maui watersheds, to control outlier populations of miconia. MISC's Miconia Management Strategy relies on both ground and aerial operations to control and contain this highly invasive plant across more than 119,000 acres of suitable habitat.

In addition, DWS supports the University of Hawaii's Project to Develop Bio-Economic Models Prioritizing Mauka Catchment Basins in the East Maui Watershed Against Incipient Miconia Invasion. This project considers the lifecycle of miconia and aims to attack incipient populations before they become of age to disperse seeds.

*"By Water All Things Find Life"*

Ms. Kylee Wideman

Page 2

We know from MISC and EMWP that their biological and mechanical efforts have always been made in earnest to yield decent progress. However, miconia remains persistent in remote areas so any additional advantage we can gain against it is welcomed. Therefore, we are in support of the free-ranging *Euselasia chrysippe* butterfly to help control miconia and other related species.

Should you have any question, please contact Edna Manzano of our Water Resources and Planning Division at [edna.manzano@co.maui.hi.us](mailto:edna.manzano@co.maui.hi.us) or call (808) 463-3108.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey T. Pearson".

Jeffrey T. Pearson, P.E.  
Director

*"By Water All Things Find Life"*



May 21, 2020

*Re: Proposed Statewide Field Release of Euselasia chrysippe for Biological control of Miconia (Miconia calvescens)*

The Big Island Invasive Species Committee supports the proposed release of the miconia butterfly *E. chrysippe* as a biological control for miconia. As there are no native members of the Melastomaceae Family in Hawaii, and several species in this group are extremely damaging to Hawaii's ecosystems, we have no concerns with non-target impacts. The EA includes the results of the extensive host testing performed by the researchers and we are satisfied with the specificity results.

BIISC is very familiar with the challenges of controlling miconia through physical and chemical efforts. Our organization claims its roots in the Big Island Miconia Action Committee, a group formed in the mid-1990s to fight miconia - one of the World's 100 Worst Invasive Species as designated by the International Union for the Conservation of Nature (IUCN).

Because the Big Island was the location of the initial naturalization in the 1960s, the infestation here by the 1990s was already entrenched. While other islands pursue eradication, the strategy on the Big Island was, from the beginning, one of containment of core populations and eradication of outliers. However, while over a decade from 1996-2006 BIMAC/BIISC controlled literally millions of plants, it was not feasible to deplete those core populations. With a million seeds per plant, a single reproducing adult can cancel years of control work in just a few seasons. Calculations of the cost of the physical/chemical control ranged from \$22/acre to \$375/acre. With hundreds of thousands of vulnerable acres on the Big Island, the task of controlling with this method alone is nearly impossible.

The strategy of containment adopted in those early years was with the intent of buying time until a biological control agent could be found. Even in 2000, the natural resources professionals who developed the Big Island miconia strategy acknowledged the critical need for this tool. We are excited and grateful to now have this tool available, and we look forward to seeing the "pretty yellow butterfly" at work in our miconia-impacted forests. We appreciate all of the work that has been done to make this biocontrol available.

Thank you for the opportunity to provide comments on this matter. Please do not hesitate to contact us with any questions.

Mahalo,

Franny Brewer  
Communications Director  
[fbrewer@hawaii.edu](mailto:fbrewer@hawaii.edu)  
(808) 933-3340

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Monday, May 25, 2020 11:35:42 AM

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You've got a new comment:

<b>Comment on a Project</b>
General/Other
<b>Name</b>
David Benitez
<b>Email</b>
<a href="mailto:david.m.benitez.a@gmail.com">david.m.benitez.a@gmail.com</a>
<b>Address</b>
PO Box 964 VOLCANO, HI 96785 <a href="#">Map It</a>
<b>Comments/Questions</b>
I am fully sportive of the proposed release of this biological control agent, and believe the rigorous screening and research conducted ensures appropriate environmental safeguards. This agent is necessary to protect our forests and watersheds from irreversible damage from Miconia, widely recognized among the world's most disruptive pest species. I see no negative environmental impacts due to this proposed action.

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Monday, May 25, 2020 5:55:25 PM

---

You've got a new comment:

<b>Comment on a Project</b>
Target: Miconia (Miconia calvescens)
<b>Name</b>
Nathan Dube
<b>Email</b>
<a href="mailto:oiscmgr@hawaii.edu">oiscmgr@hawaii.edu</a>
<b>Address</b>
743 Ulukahiki St Kaiula, Hawaii 96734 United States <a href="#">Map It</a>
<b>Comments/Questions</b>
<p>On behalf of the Oahu Invasive Species Committee and myself, I would like to voice strong support for the release of a bio-control agent here in Hawaii that would reduce the numbers of Miconia plants in the state.</p> <p>Miconia calvescens in one of the most detrimental and invasive alien species in our state. Miconia trees have been proven to increase erosion due to large leaves that create immense water droplets, a canopy shading out the ability for other species to form the forest under-story, and an especially shallow root system that does not retain soil effectively. These erosion promoting characteristics also exacerbate flooding events across the mauka areas of our state. Even if those flooding events persist only in the forested areas adjacent to our communities--often they are more expansive--the effects are felt throughout the island. Excess runoff carries with it increased sediment due to the erosion caused by Miconia trees, which intensifies coastal brown-water events. The runoff also carries with it non-point source pollutants like chemicals and synthetic debris (e.g. plastics), depositing them throughout neighborhoods on the way to polluting the ocean.</p> <p>In addition to the erosion and flood complications, Miconia is incredibly invasive. This tree produces up to 9 million seeds per year and has been assessed as a high-risk species by the Hawaii Invasive Weed Risk Assessment. This species is able to form monotypic stands that prevent other species from growing in Miconia-dominated forest areas, which decreases bio-diversity and intensifies erosion due to the absence of other species.</p> <p>Incorporating bio-control agents is a crucial step in effectively controlling, and one day eradicating, Miconia from our islands. The seed bank longevity for this species is exceptionally long with seeds remaining viable in the soil for at least 18 years. The tree's prolific reproductive capability, high level of invasiveness, and erosion promoting characteristics make Miconia an extremely difficult species to control and eradicate. Conservation land managers need to utilize as many tools as possible in creating a healthier Hawaiian forest, and this biological control agent will assist in that fight.</p>

**Do you wish to be notified during early consultation for future biocontrol projects?**

- Yes

**From:** [biocontrol form](#)  
**To:** [Wideman, Kylee K](#)  
**Subject:** biocontrol form  
**Date:** Tuesday, May 26, 2020 2:56:06 PM

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You've got a new comment:

Comment on a Project
Target: Miconia (Miconia calvescens)
Name
Adam Radford
Email
<a href="mailto:miscmgr@hawaii.edu">miscmgr@hawaii.edu</a>
Address
PO Box 983 Makawao, HI 96768 United States <a href="#">Map It</a>
Comments/Questions
<p>Aloha,</p> <p>In the hills above Hana, Nahiku, and Keanae, the Maui Invasive Species Committee (MISC) crew hikes day in and day out looking for and pulling miconia plants. A significant amount of helicopter time has also been committed to the project since the 1990s. Fortunately, these efforts have kept miconia to low-elevation forests on East Maui and out of West Maui. However, we are losing the battle.</p> <p>Miconia, in the melastome family (Melastomataceae), is a notorious invader of Hawaiian forests. A single plant can produce millions of seeds. Miconia seeds grow quickly into large plants with huge leaves that block out the sunlight, preventing other plants from germinating. Miconia's shallow roots do little to stabilize soil. Eventually, miconia becomes the only plant in the forest; invaded sites are known for landslides and erosion that muddy streams and bury reefs.</p> <p>MISC supports the proposed field release of the small butterfly, <i>Euselasia chrysippe</i>, for biological control of the noxious weed <i>Miconia calvescens</i>. A variety of tools will be needed to stem the tide, this is an important one.</p> <p><i>Euselasia chrysippe</i> is a natural herbivore of miconia in the plant's native range of Costa Rica whose caterpillars feed externally on the leaves of several species of Miconia. Extensive testing has shown <i>E. chrysippe</i> to be host-specific to miconia and other closely related members of the melastome family, all of which are non-native weeds in Hawaii. Because <i>E. chrysippe</i> is limited to feeding on a small pool of closely related species, all of which are invasive, its release is expected to be beneficial to Hawaii's forests and hydrology, and adverse effects are expected to be negligible, leveling the playing field for control efforts.</p> <p>Mahalo for your consideration of this request.</p> <p>Adam Radford</p>

MISC Manager

**Do you wish to be notified during early consultation for future biocontrol projects?**

- Yes



## East Maui Watershed Partnership

### Watershed Partners

County of Maui/  
Department of  
Water Supply

May 26, 2020

Hawaii Dept. of Agriculture  
Christopher Kishimoto  
1849 Auiki St.  
Honolulu, HI 96819

East Maui  
Irrigation  
Company

Dear Mr. Kishimoto:

Haleakala  
National Park

The members of the East Maui Watershed Partnership (EMWP) participate together to protect East Maui's native rainforest and primary water source in perpetuity. *Miconia calvescens* has been determined by EMWP to be one of the most invasive weeds, with the greatest potential to permanently disrupt the watersheds of East Maui.

Haleakala Ranch

EMWP is supportive of an IPM approach to pest control and believes that biological control of *Miconia calvescens* in Hawaii is an important tool for management of this problematic species.

State of Hawaii  
Department of  
Land and Natural  
Resources

The Draft Environmental Assessment and Anticipated Finding of No Significant Impact (DEA-AFONSI) for the Proposed Statewide Field Release of *Euselasia chrysippe* (Lepidoptera: Riodinidae) for Biological Control of *Miconia calvescens* (Melastomataceae) is comprehensive and thorough. EMWP supports the proposed field release of *Euselasia chrysippe*.

The Nature  
Conservancy

Sincerely,

Dan Eisenberg  
Program Manager  
East Maui Watershed Partnership



May 26, 2020

Jonathan Ho  
Plant Quarantine Branch  
Hawai'i Department of Agriculture  
1428 South King Street  
Honolulu, Hawaii 96814-2512

### Support for biocontrol for *Miconia*

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Aloha mai kākou,

On behalf of the Maui Conservation Alliance (MCA), we would like to voice our support for the proposed field release of the small butterfly, *Euselasia chrysippe*, for biological control of the noxious weed *Miconia calvescens*. A variety of tools will be needed to stem the invasion; this is an important one.

*Miconia*, in the melastome family (Melastomataceae), is a notorious invader of Hawaiian forests. A single plant can produce millions of seeds. *Miconia* seeds grow quickly into large plants with huge leaves that block out the sunlight, preventing other plants from germinating. *Miconia*'s shallow roots do little to stabilize soil. Eventually, *miconia* becomes the only plant in the forest, displacing rare native plants and disrupting ecosystems. Invaded sites are known for landslides and erosion that muddy streams and bury reefs.

*Euselasia chrysippe* is a natural herbivore of *miconia* in the plant's native range of Costa Rica whose caterpillars feed externally on the leaves of several species of that genus. Extensive testing has shown *E. chrysippe* to be host-specific to *miconia* and other closely related members of the melastome family, all of which are non-native weeds in Hawaii. Because *E. chrysippe* is limited to feeding on a small pool of closely related species, all of which are invasive in Hawaii, its release is expected to be beneficial to Hawaii's forests and hydrology, and adverse effects are expected to be negligible.

Steve Robertson, Chair  
Tamara Sherrill, Secretary

The MCA is a cooperative partnership of more than thirteen government, private and non-profit organizations who are the key leaders in the management of Maui's native ecosystems. MCA is committed to accelerating conservation management on Maui's highest priority conservation needs.