APPENDIX C



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Subj: RE: Kahului Risk Assessment Draft Scope of Work Date: Thu, 6 Jul 2000 1:42:52 PM Eastern Daylight Time

From: "Alan Holt" <aholt@popmail.tnc.org>

<Stephen Miller@r1.fws.gov>, <James.R.Kosciuk@usda.gov>,

<Hilda.C.Montoya@usda.gov>, <lloyd loope@nbs.gov>, <fkraus@hawaii.edu>,

<WongLSR@aol.com>

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DOIS intentions We all asked Steve to take a crack at defining the risk assessment work before us because we are confused about our goal, who we're trying to satisfy, and who will implement whatever it is that we design, etc. Steve's draft seems to restate much of the work that was described (or at least implied) in the original Kahului Alien Species Action Plan. Before we go there, though, we need to lay out the current situation explicitly, i.e.:

Steve and colleagues -- Thanks for the draft, Steve, and please excuse me for

chewing it up here. This is going to be long and heavy, so don't try to read it when you're distracted, tired, or sick of invasives issues.



- 1. Now that many elements of the original runway project are at least postponed indefinitely, what is the relationship between the risk assessment we are designing and the work by DOT and FAA at the airport? Proposed answer: Although the runway extension is on hold/cancelled, the parties involved in the ASAP have a shared interest in carrying out the fundamental goal of the ASAP: to prevent the introduction of alien species into Maui via the Kahului Airport to the greatest extent possible. The interests of the Dept. of Interior, HDOA, USDA, and other natural resources groups in this are obvious. The DOT and, hopefully, FAA want this in order to reduce obstacles to future airport operation and improvement. While it may be legally OK to proceed with a number of improvements at Kahului without making any changes in invasive species prevention systems, the parties want to make as much progress as possible toward a state-of-the-art prevention system because of their shared interest in avoiding conflicts such as those experienced on Maui over the past decade.
- 2. Who will pay for the risk assessment or other improvements we design, and roughly what is our budget? Are we basically working within present resources or is the sky the limit, or what? Proposed answer: The initial risk assessment and design work may be paid for by special, one-time funds from USDOI. The improvements we design will be paid for out of the operating budgets of HDOA and USDA-APHIS, with some case-by-case supplemental funding via USDOI, HDOT and possibly other transportation sources (airport funds, FAA). We do not have any commitment of airport landing fees for major one-time capital or ongoing operating money (aside from their existing commitment of support to APHIS operations and airport facilities). ssentially, then, we are designing improvements that can be implemented by the APHIS and HDOA within normal funding sources, and with special supplemental funding in those cases where we can make a compelling case to those funding sources.

3. Who will implement our design, and what is their capacity? Proposed answer: HDOA and APHIS will implement the risk assessment process and any system improvements that emerge from it. Their skills may be supplemented by outside experts at their discretion. Essentially, though, the improvements must be workable within these agencies, and must take into consideration the existing workload, strategic initiatives, and talents of these teams.

The first task of defining the risk assessment project, then, is to confirm that all of the parties agree with the above or with some other set of answers that establish the ground rules for moving forward. Steve's draft assumes that the ground rules are basically unchanged from the ASAP agreement, which doesn't seem to be the case any more to me. His draft sets out to remedy the shortcomings of the consultant-drafted "initial management assessment", and to do a fairly comprehensive assessment of all sources of pest risk before any other airport work is undertaken. I don't think we have that opportunity any more, and need to shift to an incremental approach to risk assessment and quarantine improvment.

We should commit to a risk assessment process that is incremental rather than comprehensive-up-front, and that becomes an ongoing, core activity of the agencies. It should be designed and run by APHIS and HDOA, with assistance as they request, to be built on to the assessment work that APHIS is already invested in, and that Neil Reimer has begun to apply to selected pests and pathways for HDOA.

It should use the same set of approaches that are already in use by APHIS: 1) assess specific port-of-origin/commodity combinations for specific pests in order to establish import and inspection standards for those specific commodities/ports of origin, 2) assess pathways for a range of pests as part of ongoing AQIM/efficacy monitoring, and 3) assess a limited number of specific, known, high-risk pests for all possible pathways, ports or origin, etc.

The work plan for risk assessment, then, could describe how we're going to use roughly \$300,000 in up-front USDOI money to jump start and sustain an ongoing risk assessment system in Hawaii with initial focus on Kahului airport. Rather than use the funds for a substantial, consultant-driven review and planning process, we might consider committing the funds to Neil Reimer and Jim Kosciuk to extend their existing work and build the new tools they need. HDOT might then be convinced to provide supplemental funding that helps sustain this system.

HDOT, meanwhile, needs to show clearly which of the invasive species prevention improvements described in the original ASAP they are committed to funding and implementing. E.g., the traveler awareness items, which depend completely on HDOT and the airlines for success. In return, HDOT needs to get a clear message from USDOI et al. that

certain specific improvements at Kahului can move forward without any further waiting for risk assessments, etc.

As Ben said at our June meeting, the leadership of HDOT wants to cooperate in efforts to reduce the flow of unwanted pest species through Hawaii's ports of entry. They are no longer under the hammer of the runway extension or any other mandate to work on invasives, but choose to remain involved anyway. The key to making some progress now is to set some reasonable and practical objectives, share the cost of implementing them, and then use these successes to build the kind of collaborative team that was originally envisioned in the ASAP for ongoing decision-making re: pest management at the airport. The other key is to invest in Jim Kosciuk, Neil Reimer, and their teams as the leaders of the risk assessment system that will steer

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Hawaii's inspection program. I'm done. I look forward to hearing what others think. Alan ----Original Message----From: Stephen_Miller@rl.fws.gov [mailto:Stephen_Miller@rl.fws.gov] Sent: Monday, July 03, 2000 1:48 PM To: aholt@popmail.tnc.org; James.R.Kosciuk@usda.gov; Hilda.C.Montoya@usda.gov; lloyd_loope@nbs.gov; fkraus@hawaii.edu Subject: Re:Kahului Risk Assessment Draft Scope of Work Please review the attached (Word file) Draft Scope of Work for the Kahului Airport Risk Assessment. Please feel free to expand on various sections, add new sections, or alter the order, etc. We especially need input from USDA (Kosciuk, Montoya, others) and State DOA (- they are the professionals that know what needs to be done and how to do it. I have FAXed this document to Lyle Wong and Neil Reimer for review. Please keep comments focused and practical and with enough detail to give good guidance to whomever (Beardsley and Hara?) take on the risk assessment project. Thanks (See attached file: Risk Assessment scope of work.doc) Stephen E Miller@fws.gov Ecosystem Conservation Coordinator Pacific Islands Office U.S. Fish and Wildlife Service 300 Ala Moana Blvd, Room 3-122 Honolulu, Hawaii 96850 Phone: (808) 541-3441 FAX: (808)-5413470 -----Headers -----Return-Path: <aholt@popmail.tnc.org> Received: from rly-ye04.mx.aol.com (rly-ye04.mail.aol.com [172.18.151.201]) by air-ye02.mx.aol.com (v75.18) with ESMTP; Thu, 06 Jul 2000 13:42:52 -0400 Received: from linuxmail.tnc (popmail.tnc.org [192.112.66.31]) by rly-ye04.mx.aol.com (v75.18) with ESMTP; Thu, 06 Jul 2000 13:42:21 Received: from [63.65.30.68] (HELO sparrow) by linuxmail.tnc (CommuniGate Pro SMTP 3.1) with ESMTP id 3576305; Thu, 06 Jul 2000 13:42:17 -0400 Reply-To: <aholt@popmail.tnc.org> From: "Alan Holt" <aholt@popmail.tnc.org> To: <Stephen_Miller@r1.fws.gov>, <James.R.Kosciuk@usda.gov>, <Hilda.C.Montoya@usda.gov>, <lloyd loope@nbs.gov>, <fkraus@hawaii.edu>, <WongLSR@aol.com> Subject: RE: Kahului Risk Assessment Draft Scope of Work Date: Thu, 6 Jul 2000 10:42:01 -0700 Message-ID: <002401bfe771\$7e553fa0\$6ad1fea9@sparrow.tnc> MIME-Version: 1.0 Content-Type: text/plain; charset="iso-8859-1" Content-Transfer-Encoding: 7bit X-Priority: 3 (Normal) X-MSMail-Priority: Normal X-Mailer: Microsoft Outlook 8.5, Build 4.71.2173.0

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