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ENVIRONMENTAL IMPACT STATEMENT

FOR

BOAT TOUR OPERATIONS

TO THE

NA PALI COAST

Kauai, Hawaii

Applicant

Pacific Seafarer, Inc.

P.O. Box 335

Hanalei, Kauai, Hawaii 96714

(Formerly Na Pali Coast Boat Charter)

Prepared By

VTN Pacific

1164 Bishop St., Suite 906

Honolulu, Hawaii 96813

July 1978

ENVIRONMENTAL IMPACT STATEMENT

July 1978

PROJECT: BOAT TOUR OPERATIONS

LOCATION: HANAIEI AND NA PALI COAST,
ISLAND OF KAUAI, HAWAII

APPLICANT: PACIFIC SEAFARER, INC.
P. O. BOX 385
HANAIEI, KAUAI, HAWAII 96714
(Formerly Na Pali Coast Boat Charter)

ACCEPTING AGENCY: BOARD OF LAND AND NATURAL
RESOURCES, STATE OF HAWAII

CONTACT: FRED L. PROBY
CHIEF ENVIRONMENTAL SCIENTIST
VTN PACIFIC INC.
1164 BISHOP, SUITE 906
HONOLULU, HAWAII 96813
521-5651

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I. DESCRIPTION OF THE PROPOSED ACTION

A. INTRODUCTION

The proposed action involves the establishment of boat tour operations to be based in Hanalei, Kauai, consisting of scenic tours to the Na Pali Coast and landings at several beaches along the coast. Since the tour operations will take place within State Conservation Districts, Regulation 4 of the Department of Land and Natural Resources requires the applicant, Pacific Seafarer, Inc., to file a Conservation District Use Application. This Environmental Impact Statement was requested by the Department of Land and Natural Resources as part of the requirements for processing the applicant's Conservation District Use Application.

B. LOCATION

The base of operations for the proposed action will be located on the outskirts of Hanalei Town, behind the Dolphin Restaurant (TMK: 5-5-02:26). The proposed beach landings will be along the Na Pali Coast of Kauai, at sites designated by the Division of Land and Natural Resources. At the present time, it is anticipated that landings would be permitted at Nualolo Kai and Milolii Beaches (see Figure 1, Location Map).

C. THE BASE OF OPERATIONS

The applicant, Pacific Seafarer Inc. has obtained exclusive commercial tour operation rights on a parcel of land fronting the Hanalei River. Current uses of the parcel include the Dolphin Restaurant, the Hanalei Trader Store, and several small residences. The residence directly behind the restaurant will be converted into a business office/ticket desk, with a large seating area for customers to gather. A covered lanai will be built adjoining the building on the river side. The house will be converted to provide two large toilet

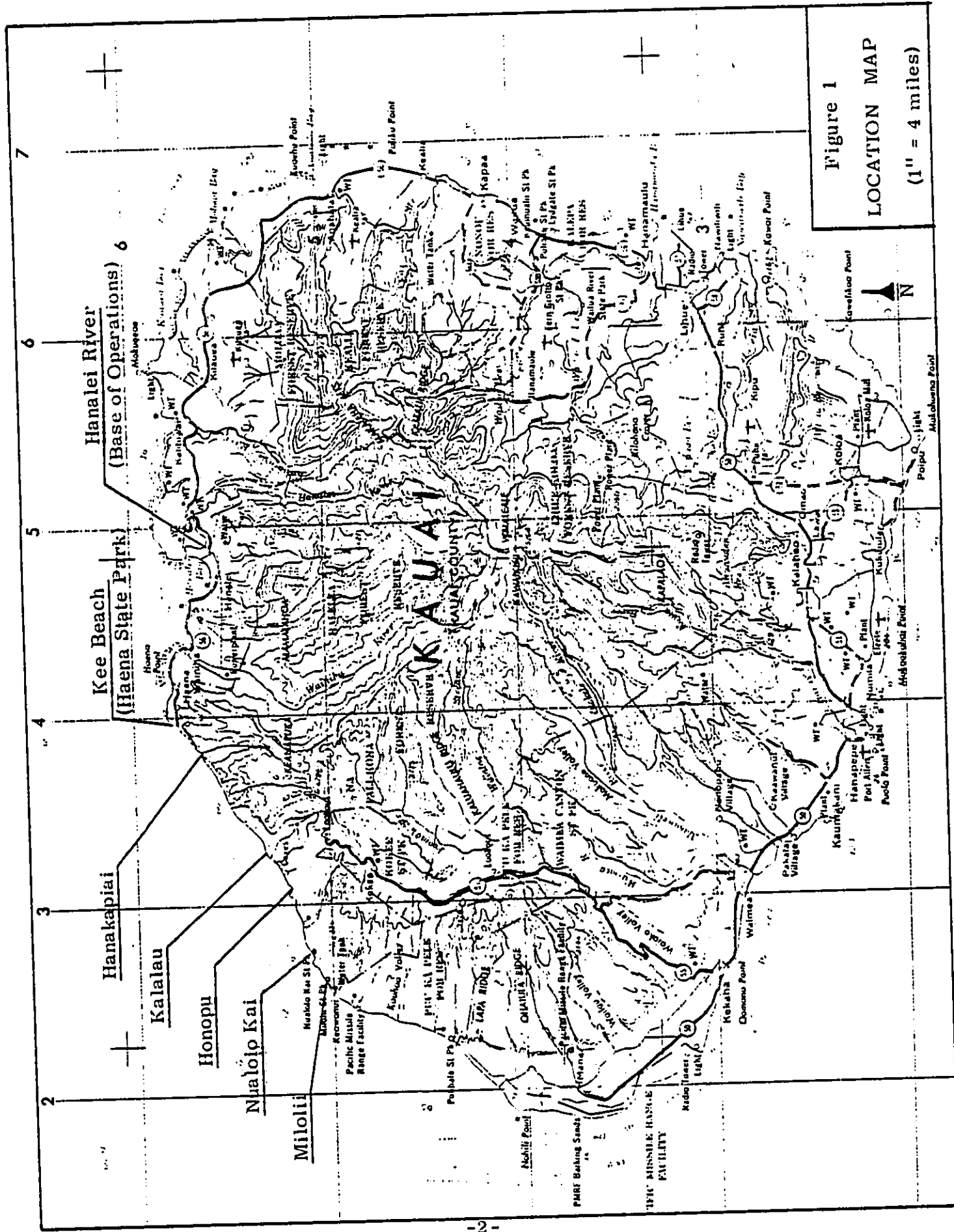


Figure 1
LOCATION MAP
(1" = 4 miles)

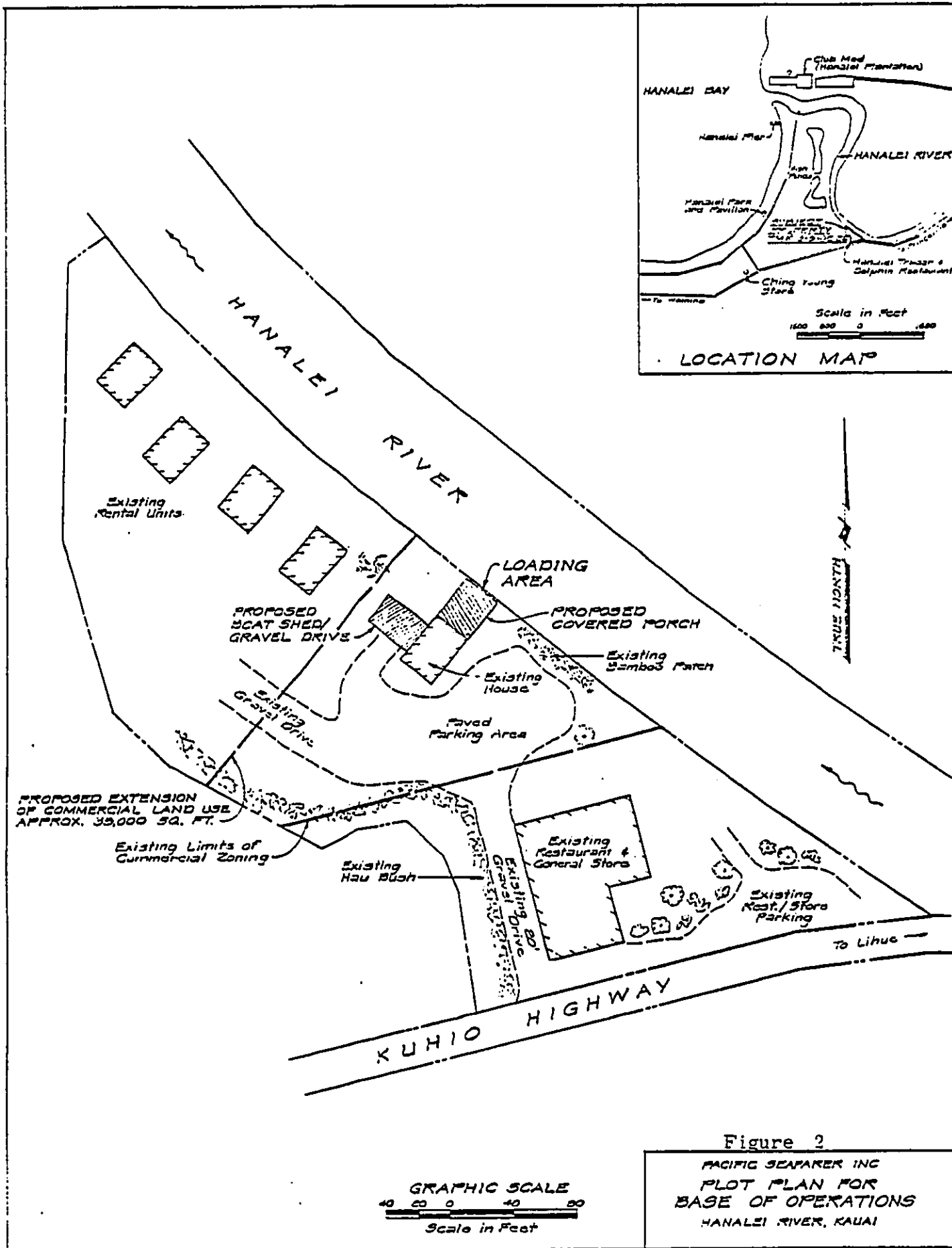
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areas with outside access. Although the County of Kauai has confirmed that the existing tank is adequate for up to 100 users per day, a second septic tank will be installed to provide ample capacity for the heaviest projected uses. An existing gravel parking lot behind the restaurant will be paved, and a three-stall carport and tool shed will be constructed on one side of the house to provide a maintenance area. Since diesel fuel is not available in Hanalei, an underground storage tank will be installed adjacent to the tanks presently used by the Hanalei Trader Store. The area will be landscaped to enhance the present tranquil setting. The plot plans for this facility are shown on Figure 2.

D. THE BOAT TOURS

Passengers wishing to take any of the tours offered by Pacific Seafarer, Inc. will assemble at the base of operations and embark from the river bank onto one of the company's boats. Construction of a floating dock in the river was originally proposed, but has been deleted to avoid conflicts with flood control improvements contemplated by the Corps of Engineers. Passengers will be loaded with a portable ladder or gangplank. Two types of boat charters will be offered: a scenic tour involving no landings and an "adventurer tour" which will include landings at approved beaches along the Na Pali Coast.

Scenic tour passengers will be loaded onto a 32-foot boat from the base of operations. At times when the river mouth is open, the boat will be brought up the river, otherwise passengers will be tendered in rubber boats. The boat to be used for the scenic tour is a new craft designed for stability in rough seas. It is powered by two diesel inboard-outboard engines with underwater exhaust ports for quiet operation. The boat will seat 23 persons, plus crew, arranged so that each passenger has a comfortable seat and back rest. Fully loaded, the boat will draw approximately 36 inches of water. It will be specially equipped with sonar, advanced radio equipment, and a "Lecta-San" sanitation system (Coast Guard Approved - Type 2 system). The scenic tour will leave the dock in the late morning and proceed at a leisurely pace along the Na Pali Coast to Milolii Beach and back. Sea conditions permitting, the boat may pull into several large caves, anchoring in the largest to allow swimming. The scenic tour will not include beach landings. This



tour is anticipated to be the most popular of the charters offered.

The "adventurer tour" will consist of a party of six persons in a rubber Zodiac-type boat. Pacific Seafarer proposes to use two boats for this tour, both of American manufacture (Bonair Boat, Inc. in Kansas and Rubber Crafters, Inc. in Virginia). The two boats will be approximately 16 1/2 feet in length, powered by single 55 horsepower outboard motors. This tour will cover the same area as the scenic tour, but will provide for more activities, according to the interests of the party. Sea conditions permitting, more sea caves will be explored, and there will be beach landings for a picnic and short valley hike. The boat and operator will remain with the party for the entire tour. The "adventurer tour" will take a full day and is expected to appeal to people who desire more than a passive viewing of the Na Pali Coast, but who aren't prepared for overnight camping.

No overnight campers will be dropped off at the Na Pali Coast by Pacific Seafarer. The company originally intended to have a third tour option that included the dropoffs of permit-carrying overnight campers at selected beaches along the Na Pali Coast. However, due to the concern expressed by several parties during the consultation period about the possible adverse impacts due to increased camper use of the Na Pali area, Pacific Seafarer decided to drop its proposal for transporting campers to the Na Pali Coast. The only landings that are proposed would be between the hours of 10:00 a. m. and 4:00 p. m. at authorized beaches (anticipated to be Nualolo Kai and Milolii). All landing groups would be under the supervision of a Coast Guard-licensed captain, and shore activities would be limited to beach picnics, swimming, shelling and short hikes.

The maximum capacities of the two proposed tours are shown in Table 1, and compared with the projected volumes. The actual number of people that can be carried will be much less than the theoretical capacity (people per boat X trips per day X 365 days per year). There will be days during the 18-week summer season (May to September) when poor weather or equipment maintenance will stop the tours. Also winter surf removes much of the sand from the beaches making the landing quite difficult, so the picnic tour will rarely be operated from October to April. There may be calm periods during the winter season when the scenic tour can operate. Taking these factors into consideration, it is estimated that the proposed tour operations will be able to carry approximately 4,600 people yearly to the Na Pali Coast; roughly 3,200 for the scenic tour and 1,400 for the picnic tour.

Table 1. Maximum Versus Projected Tour Capacities

	Maximum Weekly Capacity ¹	Maximum Season ² Total	Projected Average Weekly Volume ³	Projected Season ⁴ Total
Scenic Tour				
Summer	161	2,898	140	2,520
Winter	161	5,474	20	680
Sub-Total		8,372		3,200
Picnic Tour				
Summer	84	1,512	65	1,170
Winter	84	2,856	6	204
Sub-Total		4,368		1,374
Yearly Total		12,740		4,574

Notes:

1. Maximum capacities are 23 people/day for the scenic tour and 12 people/day for the picnic tour (the "Adventurer Tour").
2. The summer season of May to September is approximately 18 weeks and the winter season is approximately 34 weeks.
3. Only one scenic tour per day is planned, but if the demand exists, it would be possible to occasionally make two trips. This would offset time lost to poor weather and maintenance, so the projected volume is close to the maximum capacity. However, only one trip per day can be made by each rubber boat, so lost time cannot be made up by running more trips. Poor weather and maintenance will therefore significantly limit the capacity of the picnic tour.
4. The major factor that will limit the total yearly capacity of the tours is the limited period of good weather. Only a few trips can be made during the winter season.

In addition to the two tour options described above, Pacific Seafarer, Inc. may book other charters by request. Possibilities include sport fishing, and a round-the-island trip where a party is brought to the Hanalei landing facility by a tour limousine, then taken by boat to Waimea or Port Allen where the limousine would pick them up. This latter trip would have the advantage of sparing the tour group the rougher return against the wind. In an effort to preserve the marine resources of the Na Pali Coast, Pacific Seafarer, Inc. will not take large diving, spearfishing or fishing parties to the Na Pali area.

Space will be made available in all boats that land on the beaches to assist the Division of State Parks in hauling trash out of the Na Pali Coast area. Pacific Seafarer will also stand ready to assist authorities in rescue missions or other emergency situations.

No public funds will be used in implementing the proposed action. Operations would commence upon approval of all the necessary permits. These permits include the Conservation District Use Application, now being processed by the DLNR, and a zoning change for the base of operations area from "open" to "commercial", as well as the necessary construction permits for the base of operations. The zoning change request is currently pending before the Kauai County Planning Department.

E. OTHER ACTIONS OF A SIMILAR NATURE

Up to the present time a total of five Conservation District Use Applications (from four applicants) have been submitted to the Department of Land and Natural Resources for commercial boat tours involving beach landings and/or offshore sightseeing tours of the Na Pali Coast (one of these CDUA's has subsequently been withdrawn). Pacific Seafarer, Inc.'s application was described above; a brief summary of the three other pending applications, as taken from the DLNR's files, follows:

1. Na Pali Zodiac submitted a CDUA on November 1, 1977 for a commercial operation involving sightseeing rides and beach dropoffs at several spots on the Na Pali Coast. The proposed operation involved two currently operating Zodiac (French manufactured) boats carrying six passengers each, and two other Zodiacs scheduled to be delivered to Na Pali Zodiac by the summer of 1978.

The Department of Land and Natural Resources, on November 18, 1977 determined that no EIS was required of this applicant's proposed action. At its meeting on April 19, 1978, the Board of Land and Natural Resources accepted an ammendment to Na Pali Zodiac's CDUA, making it a co-application with the Division of State Parks, and approved it subject to several conditions, including:

- Compliance with all applicable statutes of the Federal, State, and County Governments. (One of these is U.S. Customs Regulations, Section 4.80 (a)(2), which forbids vessels of foreign manufacture from engaging in coastwise commercial operations in U.S. waters.)
- Use of maximum of two boats
- No landings authorized at Hanakapiai, Honou, or Milolii.
- No use of Kee Beach is authorized.

2. Patrick B. Hanes submitted a CDUA on February 23, 1978 for a charter boat operation on the Na Pali Coast, using a 15 1/2 foot rubber boat carrying six passengers and crew. The most typical operation would be a morning trip leaving from the public launching ramp in the Hanalei rivermouth area and dropping passengers off at Kalalau and Milolii Beaches. Other itineraries contemplated by the applicant are round-trips between Polihale and Kalalau Beaches and a round-trip scenic/photographic tour from Hanalei or Polihale, with no beach landings. The lagoon at the end of the road at Haena (Kee Beach) would serve as a "back-up" landing spot to be used only when weather conditions make landing at Hanalei unsafe.

The Department of Land and Natural Resources, upon receipt of the CDUA from this applicant, requested submission of an Environmental Assessment, which was prepared by the applicant on March 17, 1978. Subsequently, DLNR determined that the applicant should submit a full Environmental Impact Statement. Action on this applicant's CDUA by the DLNR is currently pending.

3. Island Voyager filed a CDUA on March 13, 1978 for a charter boat operation in the Na Pali Coast area using a 32-foot boat with a capacity of 24 passengers plus crew. The boat would be anchored offshore near the Hanalei pier. Passengers would be loaded onto rubber rafts (French manufactured Zodiacs) on the public beach adjacent to the pier and transported to the larger boat. It was estimated by this applicant that the passenger loading operation would require approximately one thousand square feet of public beach, and that loading and unloading of passengers could be accomplished in less than two hours per day. The boat would be fueled from shore by backing a fuel truck across the beach by the pier and ferrying the hose to the fuel intake at the boat by means of the rubber rafts. Passengers would use the parking lot and restroom facilities of Hanalei Beach Park.

This operation would involve a sightseeing run along the Na Pali Coast, with no landings. Passengers for this operation would arrive at the Hanalei area by limousine or car and assemble at the beach. There would be two half-day tours per day, conducted three times per week. In a separate CDUA, also filed on March 13, 1978, Island Voyager proposed to transport campers to the Na Pali Coast using Zodiac boats. Groups of 10-20 people would be dropped off at several beaches for stays of 3 days, once a week. This application has been withdrawn. The Department of Land and Natural Resources is currently reviewing the CDUA submitted by this applicant, who has also been required to submit an Environmental Impact Statement.

In addition to these requested boat tours, three helicopter firms have recently submitted CDUA's for tours to the Na Pali Coast. These are Kenai Helicopter, Papillon Helicopters, Ltd. and Joe Harter. These firms are presently conducting scenic tours and carrying campers and picnickers to the Na Pali Coast under permit by the Department of Transportation; however, for landings in the Conservation District, a CDUA is required. Landings are made at most of the beaches, and Milolii and Kalalau have designated helicopter pads consisting of grassed clearings. It is anticipated that Environmental Impact Statements will be required for these CDUA's.

II. DESCRIPTION OF THE AFFECTED ENVIRONMENT

The purpose of this chapter is to detail aspects of the environment that may potentially be affected by the proposed action. Therefore, certain subjects typically described here, but deemed irrelevant to the proposal, have been omitted; the reader is referred to the Environmental Impact Statement Notice of Preparation for the Haena-Na Pali Recreation Plan, by the Division of State Parks (December, 1977).

A. CURRENT USES AND SOCIOECONOMIC CHARACTERISTICS

Kauai's North Shore is celebrated for its scenic quality, and as a result Hanalei has become a popular destination point for visitors to Kauai. The adjacent Princeville Ranch area has been the site of low-density resort and second-home development in recent years. Hanalei Town itself has remained rural, characterized by a mixture of taro patches and wooden buildings. The area's population was estimated at 640 in 1972 (Anderson et al, 1972).

Among the basic facilities and services available in Hanalei are an elementary school, fire station, court house, post office, general stores, restaurants and a branch bank. Residents of the area have to travel to Kapaa or Lihue for medical attention, professional services and other cultural or commercial amenities.

Taro and cattle have traditionally provided the economic base of the Hanalei community. In recent years, tourism has become more important to Hanalei, with the development of the Princeville and Club Mediterranee resorts. The Anderson study points out that due to the limited economic opportunities in agriculture in the Hanalei area, tourism-related activities present the most feasible avenue for further economic growth in Hanalei.

A survey of the community's population (Anderson et al, 1972) revealed an ethnic breakdown similar to other communities in Hawaii, with significant numbers of people of Japanese, Caucasian, Filipino, Hawaiian, Portuguese and Puerto Rican ancestry. The Anderson study identified three broadly defined groups living in the Hanalei community: the long-time residents of the area, the residents who moved to the area in the last 10 years with the intention of settling permanently in Hanalei and a third group, loosely defined as "transients", who have been attracted to the area in recent years without jobs, have a high turnover rate and are mainly represented by young "haoles" recently arrived from the mainland.

Although these three groups have diverse value systems and outlooks on issues, they share similar opinions on the direction that Hanalei should follow in the future. There was widespread agreement found in the Anderson study on the desirability of keeping small-scale agriculture in Hanalei and on the need to control large scale tourism-oriented development in the area. This attitude has been expressed on numerous occasions when the community has opposed projects proposed for the area.

The Na Pali Coast will be the primary destination for the proposed boat tours. With its massive sea cliffs and amphitheater valleys, the Na Pali Coast is without doubt one of the most spectacular natural features in Hawaii. However, there are no roads, and only a portion of the coast is accessible by trail; as a result, few people have the opportunity to see the area. Helicopters and boats have been providing scenic tours and beach landings for several years, but on a relatively small scale. As more people have learned about the existence of the Na Pali Coast, demand for access to it has increased.

Most visitors to the Na Pali Coast reach the area by hiking in from the end of the road at Haena. An eleven mile trail extends from this point to Kalalau valley. Beyond Kalalau, the coast is only accessible by boat and helicopter. Hikers wishing to camp overnight in the Na Pali area must obtain a permit from the Division of State Parks. The estimated visitor attendance at Kalalau valley increased from under 100 per month in early 1976 to about 1100 in July 1977, the most recent month for which figures are available (Division of State Parks, 1977).

In view of the increasing popularity of this area as a visitor destination point and its fragile resources, the Division of State Parks is preparing a Management Plan and Environmental Impact Statement for the Na Pali Coast area. Among actions contemplated in this plan are the monitoring of visitors and their impact on the environment, as well as possible restrictions on the number of visitors, their means of access to the area and the permitted camping sites. Construction of facilities in the Na Pali valleys will be kept to a minimum and, when necessary, built so as to be as inconspicuous as possible. The State Parks management program for the Na Pali Coast will also emphasize research and preservation programs for the biological and archaeological resources of the area. No extensive archaeological areas will be restored if the restoration conflicts with scenic values. (Division of State Parks, 1977)

B. WATER RESOURCES AND HAZARDS

The Hanalei River dominates the approach to Hanalei Town from the old steel truss bridge to the first buildings on the outskirts of the town (the Dolphin Restaurant and the Hanalei Trader Store). At the edge of town, the river turns sharply away from the highway and is lost from view.

The proposed base of operations is located just downstream from this sharp turn in the river. At this point, the river is approximately 80 feet wide and 6 to 8 feet deep. The Hanalei River drains one of the major watersheds of Kauai. It has an average annual flow at the gage (located 2.6 river-miles upstream from the highway crossing, with a drainage area of 19.1 square miles) of 231 cubic feet per second. A discharge of 6,000 c.f.s. is considered to be of flood magnitude; the river has flooded 13 times since 1962 (U.S. Department of Transportation and State of Hawaii Department of Transportation, 1977). The summer months, during which the proposed tours of the Na Pali Coast would be conducted, are the least flood-prone time of the year for the Hanalei River. Seasonal flooding generally causes only inconvenience and closure of the highway for several hours between the Hanalei Bridge and the outskirts of Hanalei. Although there have been several damaging floods, the structure proposed for a ticket office has not been seriously affected. The covered lanai will be constructed on posts, allowing minor floods to pass underneath.

The Hanalei River has been given a Class 2 quality rating by the State Department of Health, indicating that it is not used as a domestic water supply. The actual water quality is well within State standards, with only 56-67 mg/L of total dissolved solids (standard: 28,000 mg/L) and 0.01-0.02 mg/L dissolved nitrite plus nitrate (standard: 0.1 mg/L) (U.S. Geological Survey, 1975). Coliform bacterial levels are not counted in the river, but samples taken by the Department of Health at the Hanalei Bay Landing near the river mouth range from 7 MPN to 35,000 MPN for total coliform and from less than 2 MPN to 1300 MPN for fecal coliform. This wide range is attributable to variations in river discharge. The 35,000 MPN count occurred following a heavy rain (October 20, 1975) (U.S. Dept. of Transportation and Hawaii State Dept. of Transportation, 1977). The water quality of Hanalei Bay is very good, being rated Class AA by the Department of Health.

The streams on the Na Pali Coast are subject to frequent flash flooding, and a number of drownings have occurred when campers have attempted to cross them. According to the Civil Defense Agency, the Na Pali Coast is not generally subject to tsunami inundation. However, Hanakapiai, Kalalau and Milolii Beaches have potential tsunami inundation limits of 300 feet inland. In the 1946 tsunami, wave heights (at the shoreline) of 10 feet, 12 feet and 20 feet were recorded for Hanakapiai, Kalalau and Milolii Beaches, respectively. No run-ups were recorded in the 1957, 1960 or 1964 tsunamis (Loomis, 1976). At Milolii Beach, the 300 foot potential inundation limit leaves only the dunes and talus at the base of the cliff as an escape area. The Na Pali Coast is subject to rough sea conditions and high waves on the beaches. Milolii and Nualolo Kai Beaches have state-marked boat channels up to the beach that allow small craft landings even in large surf, but landings on the other beaches are difficult. (Only Milolii and Nualolo Kai Beaches are being requested as landing sites.) The frequency of rough seas on the Na Pali Coast is the primary factor that will limit the number of boat trips that Pacific Seafarer can make.

C. BIOLOGICAL RESOURCES

The vegetation in the area surrounding the base of operation consists mainly of species introduced relatively recently into Hawaii. Land near the mouth of the Hanalei River is generally wet pastureland subject to periodic flooding, with species such as kikuyu grass (Penisetum clandestinum), pangola grass (Digitaria decumbens), intortum (Desmonium intortum) and California grass (Brachiaria mutica). The river bank across from the proposed base of operations supports a dense thicket of hau trees (Hibiscus tiliaceus), while adjacent to the base of operations, there is a small growth of bamboo (Bambusa sp.).

South of the bridge across the Hanalei River there are numerous taro ponds, which are essentially "cultivated marshes." There are about 150 acres of taro cultivation in the Hanalei area, which produce about 90% of all the wetland taro grown in Kauai, and are the most productive in the State. The taro patches provide habitat for four species of endangered Hawaiian waterbirds.

These are the Hawaiian stilt (Himantopus h. knudseni), Hawaiian coot (Fulica americana alai), Hawaiian gallinule (Gallinula chloropus sandvicensis), and Hawaiian duck or koloa (Anas wyvilliana). The Hanalei National Wildlife Refuge protects a portion of this habitat (approximately 113 acres of taro).

Other wildlife found near the base of operations is, like the vegetation, predominantly non-native. Mammals include rats and feral cats. Introduced game birds include the ring-neck pheasant (Phasianus torquatus) and the Japanese quail (Coturnix c. japonica). Other commonly found birds are the cardinal (Cardinalis cardinalis), Japanese white-eye (Zosterops japonica), shama thrush (Copsychus malabaricus), melodius laughing-thrush (Garrulax canorus), barred dove (Geopelia striata), common mynah (Acridotheres tristis) and other introduced birds. Cattle egrets (Bubulcus ibis) have recently come to the island and are increasing in numbers. Black-crowned night herons (Nycticorax n. hoactli) are common in ponds and marshes.

The native fauna of the Hanalei River includes several species of fresh water gobies (oopu), shrimp, snails, fresh water limpets and worms. Tillapia, an introduced species of fish, is abundant in taro ponds. The oopu nakea (Awaous stamineus) is a very important game fish on Kauai, the only island where it is abundant. Each fall the oopu comes downstream with peak stream flows to the mouths of the Hanalei River, Waioli and Waipa Streams, the Lumahai and Wainiha Rivers, and the Limahuli Stream to spawn. Spawning occurs primarily from mid-August to late December during which time the oopu lays a single layer of eggs on a rock. In the Hanalei River, spawning extends from approximately 200 meters below the bridge to one mile upstream. (The proposed loading area is approximately 2,000 meters below the bridge.) Spawning adults are caught in large numbers by local fishermen. The eggs hatch within 24 hours of laying and the fry are washed out to sea. After about 6 months, the oopu fingerlings return to the river and migrate upstream. The main return of young fish occurs from mid-Autumn to early summer.

The vegetation of Milolii and Nualolo Kai beaches is a combination of native and introduced plants common to coastal habitats. In the area immediately behind Nualolo Kai beach, naupaka (Scaveola taccada var. taccada) and naio (Myoporum sandwicense var. sandwicense) are the dominant natives. Common introduced plants include bermuda grass (Cynodon dactylon) and Koa-haole (Leucaena latisiliqua)

(St. John, 1975). Also present are three rare and endangered plants; Canavalia nualoloensis, Hedyotis St. Johnii and Artemisia australis. The Canavalia is a vigorous vine found in a thicket around a wet depression near the cliff base, the Hedyotis grows on the face of cliffs and the Artemisia is found in rock crevices (St. John, pers. com.).

At Milolii beach, introduced grasses (primarily bermuda grass) stabilize the level area behind the beach. There are two rare and endangered plants at Milolii; Lippochaeta alata, a sprawling herb on rocks at the base of the cliff and Nototrichium sandwicense var. kauaiensis, a shrub found on the lower slopes of the cliffs (C. Lamereaux, pers. com.).

The streams on the Na Pali Coast have not been altered, and are therefore an extremely valuable biological resource. The streams have been poorly studied, but it is likely that several species of native shrimp (opae), fish (oopu) and mollusks (hihiwai) are present in healthy populations. (For a listing of probable species and their scientific names, refer to the Division of State Parks EIS Preparation Notice referenced above. .

The endangered Koloa duck (Anas wyvilliana) frequents the streams on the Na Pali Coast, and has been sighted on Milolii Stream (C. Lamereaux, pers. com.).

Other endangered or threatened species of wildlife that may frequent the Na Pali Coast include the Hawaiian monk seal (Monachus schauinslandi) and the green sea turtle (Chelonia). The monk seal is primarily a resident of the leeward chain, though sightings on Kauai are occasionally made at Kilauea Point. According to USFWS personnel, a female monk seal has recently been sighted there on a regular basis, and has come ashore. Green sea turtles are commonly sighted all along the Na Pali Coast, typically in pairs outside of the reef. They are most common along the coast between Kee Beach and Hanakoa Valley. Although there are no recent reports of turtles being observed on shore, there are records from the 1920's of nesting activities on Milolii Beach (G. Balazs, pers. com.).

D. ARCHAEOLOGICAL RESOURCES

The Na Pali Coast was occupied for many centuries by the early Hawaiians, and there is a great abundance of cultural material, including numerous heiau, burial sites, village sites and ancient agricultural terraces. In recognition of the value of the area, the entire Na Pali Coast, from Haena to Polihale has been designated as the Na Pali Archaeological District. This District is listed on the State Register of Historic Places, and has been nominated for inclusion in the National Register. Both Milolii and Nualolo Kai contain archaeological sites; an heiau at Milolii, and a village site, heiau, burial caves and agricultural remains at Nualolo Kai and the adjacent Nualolo Aina Valley.

III. THE RELATIONSHIP OF THE PROPOSED ACTION TO LAND USE PLANS, POLICIES AND CONTROLS

Two land use plans affect the proposed action; the base of operations comes under the Kauai General Plan adopted by the County of Kauai, and the boat tours are affected by the Haena-Na Pali Coast Recreation Plan being prepared by the State of Hawaii Department of Land and Natural Resources, Division of State Parks (a conceptual recreation plan has already been adopted). The Kauai General Plan (Hanalei Planning Area) shows the site of the base of operations to be in open land use. The County of Kauai has recently denied Pacific Seafarers' SMA application and has denied extension of the adjacent commercial zone to include the project site (see figure 2).

The management of the Na Pali Coast is presently shared by the Divisions of Forestry, Fish and Game and State Parks. Consolidation under the Division of State Parks has been proposed, with cooperative management of forest resources and hunting. The Haena- Na Pali Recreation Plan recognizes the need to control the number of visitors to the area, and the relationship between the intensity of use and the means of access. The Plan states that boats and helicopters "may be in conflict with a wilderness type of experience where there would be no possibility for motorized travel." The following courses of action are recommended in the plan to determine if there is in fact such a conflict, and to formulate optimum management policies and controls:

- "a) Monitor the landings of boats and helicopters to determine: the location, frequency, and nature of their use; the characteristics of the users arriving or leaving; and the impact of these users and the vehicles on the physical and social environments.
- b) If necessary, restrict the locations accessible by boats or helicopters, and the frequency and hours during which such vehicles may be operated."

Since the DLNR is requiring Conservation District Use permits of all commercial tour operations (boats and helicopters), monitoring landings and other characteristics of this use can be accomplished through daily

logs. Pacific Seafarer plans to cooperate fully with any such requests. Knowing the concerns of the Division of State Parks and others, Pacific Seafarer has voluntarily limited the requested landing sites to Milolii and Nualolo Kai Beaches between the hours of 10 A. M. and 4 P. M. , and will not carry campers. Other measures incorporated into the proposed project that are a response to the concerns expressed in the Haena - Na Pali Recreation plan include; an orientation session for the tour parties, carrying potable water, full cooperation with authorities on rescue operations, carrying out trash, and supervision of landing parties to guard against unsafe activities and damage to natural or cultural resources.

IV. PROBABLE IMPACTS OF THE PROPOSED ACTION

A. IMPACTS OF THE BASE OF OPERATIONS

1. Construction Construction of the covered lanai, internal remodeling, installation of the second septic tank and a fuel storage tank and paving of the parking area might create minor temporary inconveniences for residents of the other dwellings behind the Dolphin Restaurant. Business at the restaurant and general store will not be disrupted in any way. The duration of construction will be limited to a few weeks, and adverse noise and other impacts will be mitigated by limiting the hours of construction and following all of the restrictions imposed by the construction permit which will be obtained from the County of Kauai. Particular care will be taken to prevent silt-laden runoff from the construction area from entering the Hanalei River.

2. Public Facilities The base of operations will provide an efficient, functional and safe assembly area for passengers taking the two tours that will be offered by Pacific Seafarer. There will be no added demand placed on Hanalei's limited parking or public beach facilities by Pacific Seafarer's customers, since ample parking will be provided at the base of operations.

3. River Bank Erosion Once the base of operation is completed, the passengers will enter the boats at the river bank. The river bank adjacent to the base of operations has some evidence of erosion and some further erosion is possible as a result of the passenger loading operations. To reduce this possibility, passengers will enter the boats with the help of a portable ladder or gang plank. As a further erosion-preventing measure, the boats will be operated at low speed in the river, to minimize prop-wash and attendant wave generation.

4. Boat Fueling When the river mouth is not shoaled, fueling of the 32-foot boat would be accomplished at the river bank by the base of operations. At other times, fuel containers would be ferried out by the rubber rafts. Another alternative would be to take the boat to Nawiliwili for fueling. In any event, the risk of fuel spills is minimal, due to the fact that the fuel intake for the

large boat is located inboard, and fuel containers ferried by the rubber rafts would be sealed.

5. Automobile and Boat Traffic With a theoretical maximum of 32 passengers per day (20 passengers for the scenic tour and 12 for the adventurer tour), the base of operations could attract approximately 16 cars per day, based on the assumption that passengers will arrive in private or rental automobiles at an average of two per car (Tour buses will not be allowed). Average daily traffic for 1978 on the segment of Kuhio Highway between the Hanalei bridge and Hanalei Museum Road has been estimated at 2,367 vehicles (DOT, 1977). Thus, the maximum potential impact of traffic generated by the base of operation on the adjacent segment of Kuhio Highway is an increase of approximately one percent. Turning vehicles may cause traffic conflicts in the morning when passengers are arriving and in the late afternoon when they depart. However, the low traffic volume and good visibility on this section of the road minimizes the potential for accidents. When compared with the capacity of the highway, estimated at 1,200 vehicles per hour, the impact of automobile traffic generated by the base of operations will be negligible.

Boat traffic in the Hanalei River presently consists of local fishermen, canoes and water skiers from Club Med. The proposed tour operations will add approximately twelve rubber boat trips per day between the loading area and the river mouth. There will be four trips for the adventurer tour (two out and two in), and eight trips ferrying passengers to and from the scenic tour boat. When the river mouth is open, the 32-foot boat could come up to the loading area, cutting the boat traffic to six trips. The boats will be operating in the river for brief periods in the morning and in the afternoon. A slow speed will be maintained for safety.

6. Biological Resources Construction of the base of operations will not involve any grading or removal of vegetation. The boats will not go up river, and the loading area is sufficiently removed from the Hanalei National Wildlife Refuge, that the base of operations will not have an impact on the endangered waterbirds. As noted in Chapter II, the river area upstream from the proposed base of operations is a spawning ground for oopu from August to December. The estimated period of regular operations for the Pacific Seafarer boat tours would overlap slightly with the oopu

spawning season. However, due to the small draft of Pacific Seafarer's boats and the measures that will be taken to minimize turbidity from propwash, no adverse impact on the oopu spawning is anticipated.

7. Socioeconomics The small scale of the improvements proposed at the base of operations is in keeping with Hanalei's rural character and with the desire expressed by local residents to control the growth of tourism in the area. It is anticipated that when the proposed action is implemented a total of 4-6 jobs will be created. Some secondary economic benefits would flow to the Hanalei community as a result of spending on other products and services by customers of Pacific Seafarer.

B. IMPACTS OF THE PROPOSED BOAT TOURS

1. Wilderness Quality The isolation and inaccessibility of the Na Pali Coast gives it a true wilderness character. Only the first two valleys east of the road's end, Hanakapiai and Kalalau, can be reached by land; and the (Kalalau) trail into them is very difficult. Most of the coast can only be reached by boat or helicopter, and landings are only possible at the scattered pocket beaches. This wilderness quality, in conjunction with the scenic beauty of the area, is the greatest attraction of the Na Pali Coast and the primary resource that must be preserved. Maintaining the Na Pali Coast as a wilderness resource is the goal of all parties concerned.

The greater the number of people in an area, the lower the quality of the wilderness experience is for everyone involved. Recognizing this relationship, the management policies currently being developed by the Division of State Parks center on limiting the number of visitors to the Na Pali Coast. To this end, a camping permit system has been established, and surveys are being conducted to determine carrying capacities. According to the Division of State Parks, the Kalalau area had over 1,100 campers during July of 1977, with as many as 200 people present on a Saturday or Sunday. Although no data is available, the number

of people present in Hanakapai Valley on a typical summer weekend is presumably much greater than at Kalalau, since it is only two miles from the trail head and therefore receives much day-use. It is the general consensus of frequent visitors to Hanakapai and Kalalau Valleys that the wilderness quality of these areas is being compromised by such large numbers of people.

In contrast, only 199 people with permits camped at Milolii Beach from July 1976 to June 1977. Nualolo Kai had only 146 campers in the same 12-month period. (Since this data is based on the number of permits issued, the actual number of campers at these beaches could have been higher; however, the same is true for campers at Kalalau, so the relative degree of usage would remain the same.) Although there is less camping area than at Kalalau, it is clear that over crowding is not as much of a problem at Milolii or Nualolo Kai.

The reason that Milolii and Nualolo Kai beaches get so little use is the lack of land access. The majority of the people that camped there in 1976 and 1977 were transported by commercial boat or helicopter (operating before it was known that a Conservation District Use Permit was required). Some campers may have come in their own boats, but the type of boat required for beach landings and the risk involved in anchoring a boat unattended, would limit the number of people attempting this.

With Pacific Seafarer and the other boat tour applicants dropping their proposals to carry campers to the Na Pali Coast, helicopters will be the only means of access for campers to Milolii and Nualolo Kai Beaches. Because of the higher cost, it is likely that significantly fewer people will camp at these beaches. It is also possible that the helicopters will be restricted from carrying campers, in which case camping at these two beaches will be virtually eliminated.

These factors place the magnitude of the proposed day-use tours into proper perspective. As explained in Chapter I (see Table 1) the day-use tour will carry an average of 65 people per week from May to September. On a typical day, Pacific Seafarer will bring no more than seven people (six passengers and one operator) to a beach; one boat to Milolii and one to Nualolo Kai. The boats will not land before 10 A. M. and will leave with all six passengers by 4 P. M. This small number of people should be well within the carrying capacities of these beaches, especially since the

number of campers will probably decrease. Landings will not be made at Hanakapiai or Kalalau beaches where there are already large numbers of hikers.

A second element that must be controlled in order to preserve the wilderness quality of an area is the presence of "technology", particularly motorized transport. Any form of motorized transportation may be perceived as an intrusion in a wilderness environment. However, if access to the beaches beyond Kalalau is to be allowed at all, it will have to be either by boat (commercial or private) or by helicopter. Because of the sheer cliffs, additional trail construction is impractical. Therefore, the issue becomes which type of transport minimizes the impact to the wilderness atmosphere, or if both are considered acceptable, how many vehicles there can be before the wilderness experience of the majority of users is compromised. Helicopters, as some are presently operated on the Na Pali Coast, are more of an intrusion than are boats, since helicopters are visible and audible for a much greater distance.

The two tours proposed by Pacific Seafarer would add a maximum of three boats to the Na Pali Coast; two 16-1/2 foot rubber zodiac-type boats (American manufacture) and one 32-foot fiberglass boat. Each boat would make one pass down the coast, and one pass returning to Hanalei. The boats would be clearly visible from the Kalalau Trail, but less so from Kee, Hanakapiai or Kalalau beaches, due to the lower angle of view. The boats will stand off from these beaches to further lessen the noise and visual intrusion. Beyond Kalalau Beach, the boats can come in closer to shore without causing any disturbance. When beached or anchored offshore at Milolii or Nualolo Kai beaches, the low profile of the rubber boats makes them less obtrusive. Since the boats will only operate along the coast, the wilderness atmosphere of the interior region will not be affected.

In summary, the use of any wilderness environment involves a trade off between the number of people allowed to enjoy it, and the quality of the wilderness experience for those that do. Banning all forms of motorized transportation would eliminate almost all use of the areas inaccessible by foot. On the other hand, unlimited access by motorized transportation degrades the quality of the wilderness experience for all users. Assuming motorized access to Milolii and Nualolo Kai is to be allowed, the use of rubber boats involves the least sacrifice of the quality of wilderness

experience. Pacific Seafarer does not propose to bring large numbers of people into the area. An average of 65 people per week in the summer will be brought to Milolii and Nualolo Kai beaches for day use only. The scenic tour will allow a maximum of 23 people per day to view the Na Pali Coast without landing. (The cumulative impact of this and other proposed operations is discussed below.)

2. Sanitation and Litter There are three pit privies at Milolii Beach and two at Nualolo Kai. With the small number of people presently using these beaches, sanitation is not a problem. An increase in the number of day-users may require more frequent maintenance of the facilities. Because of the questionable quality of the drinking water at Milolii and Nualolo Kai beaches, the picnic group will carry its own water.

The scenic tour boat is equipped with a "Type 2" marine sanitation device, which electronically treats wastes before discharging them to the water. This system will purify the wastes to a maximum coliform count of 200 per milliliter and a maximum of 150 milligrams per liter suspended solids. The boat is also equipped with a holding tank that has a 30-flush capacity. Because wastes may not be discharged into Class AA waters, the holding tank shall be used whenever the boat is within three miles of shore. The wastes will be pumped out at the base of operations on the Hanalei River. A second septic tank is being added to the existing system in the house, so there will be ample capacity for the boat's wastes. The pumping system will be designed to guard against spills. At times when the boat can not come up the Hanalei River, the wastes will be discharged beyond the 3-mile limit.

An increase in litter is perhaps the greatest secondary impact on wilderness quality from an increase in use. It is presently a serious problem at the three main stopping points on the Kalalau Trail (Hanakapiai, Hanakoa and Kalalau), and could become a problem at the more isolated locations. Litter is primarily the result of a poor attitude toward the environment, and is found in all categories of users. (The trash in Hanakoa Valley can be entirely attributed to hikers, since the area is inaccessible to boats or helicopters.) Pacific Seafarer will encourage each of its passengers to do all that is possible to preserve the beauty of the area. The picnic groups will carry out all of their trash

and will police the general area. Pacific Seafarer has also offered to make space available in their boats to carry out trash collected in the cans currently provided at the beaches. The trash will ultimately be disposed of at the County landfill east of Princeville.

3. Safety The Na Pali Coast can be very rough and dangerous for small craft. However, each boat will be provided with radio equipment, and will heed all marine advisories. This is one of the factors that will limit the number of trips that can be made. Pacific Seafarer's boats will only be operated by experienced, Coast Guard-licensed captains. The safety of their passengers will be the boat operators' primary concern; there will be no foolhardy acts, such as entering the caves under adverse conditions. Each boat will carry life preservers for each passenger, flares, a repair kit with spare parts and other safety and first aid equipment. Because each boat will be equipped with CB radios, they will be able to quickly respond to any emergency situation, and can summon the assistance of the other boats. Therefore, the proposed operation will enhance the emergency response and rescue capability on the Na Pali Coast, rather than place a burden on the presently limited capabilities.

Beach landings on the Na Pali Coast can be very difficult, due to the steepness of the beaches and the surf. However, Milolii and Nualolo Kai both have boat channels marked by the State, which make landings much safer than at the other beaches. If the operator judges that a landing would be too risky, the party would be returned to Hanalei and receive a refund. While on the beach, the operator will remain with the group to discourage climbing the cliffs or other hazardous activities. Pacific Seafarer Inc. carries full liability insurance.

While these factors do not eliminate the danger inherent in the proposed boat tours, they will reduce the probability of injury to the passengers. These tours are designed to be a stimulating outdoor experience and are not intended for the average tourist. The risks, though controlled, are part of the wilderness experience.

4. Biological Resources. None of the rare and endangered plants known to occur at Milolii and Nualolo Kai are easily subject to damage by humans. They either grow on cliff faces or on talus slopes where access is extremely difficult, or, in the case of Canavalia, are handy plants that are fairly resistant to trampling. Direct damage to these plants from people brought in by Pacific Seafarer is therefore very unlikely. Since both beaches have been exposed to human activity for many years, they already support a significant number of exotic plants. However, some new introduction of weedy plant species could result from the proposed picnic tours. Most of the activity will be confined to the beaches, where relatively few new exotic plants could become established.

The Hawaiian monk seals or green sea turtles that frequent the Na Pali Coast may be disturbed by the proposed tour boats. However, if any turtles, seals or whales are sighted, the boats will be kept at a distance so as not to harrass them in any way. The presence of humans may inhibit nearshore feeding by turtles, however, most of the turtle sightings along the Na Pali Coast are outside of the reef. The turtles' breeding season is April to September, so there is a potential for disturbance by the boat tours. Since nesting takes place at night, the proposed day-use tours would not affect this aspect of the turtles' life cycle. Pacific Seafarer will not carry large fishing or dive parties to the Na Pali Coast, and the picnic groups will not be allowed to collect opihi or remove any tidepool animals. The rubber boats use a relatively light anchor which will not hurt the reef, and the 32-foot boat will rarely anchor on the Na Pali Coast.

5. Archaeological Resources. The proposed day-use tour has the potential for exposing the archaeological sites at Milolii and Nualolo Kai to damage, due to the fact that they will bring people to the area. However, the potential for damage is much less than from campers or private boaters, who would not be supervised. Unless an interpretive program is set up the the State, Pacific Seafarer would strongly discourage its passengers from visiting or looking for archaeological sites. Since Pacific Seafarer will not be involved with camper drop-offs, they will have much more control over the activities of their passengers.

6. The Growth-Inducing Impact. The proposed picnic and scenic tours are largely a response to an increased public awareness of the Na Pali Coast. Numerous articles in travel and backpacker-oriented magazines have publicized the beauty of the area and have undoubtedly contributed to the dramatic increase in visitors over the last few years. The proposed tours would, in turn, make the area known to more people, thus increasing the demand for access. But with or without boat tours, the Na Pali Coast has been "discovered", and some form of control is needed to preserve its wilderness character. This control is in the hands of the State. Since there is only one trail and very few boats or helicopters, it will not be difficult to limit the number of people entering the area, once the State has decided what that number should be.

C. CUMULATIVE IMPACTS OF THIS AND OTHER SIMILAR PROPOSALS

As outlined in Chapter I, a total of five applications for boat tours to the Na Pali Coast have been submitted to the DLNR since November, 1977. One of these applications has been approved (Na Pali Zodiac) and one has been withdrawn (Island Voyager's 3-day group camping). As of this writing (June 1978), there is one rubber boat being legally operated for day-use tours, and decisions by the DLNR pending for three more rubber boats (two with Pacific Seafarer and one with Patrick Hanes). In addition, decisions are pending for two 32-foot boats to be used for scenic tours without Na Pali landings (Pacific Seafarer and Island Voyager). Because of the requirement of an

EIS, it is probable that the Hanes application (one day-use tour) will be withdrawn. If permission is granted to Pacific Seafarer for the two requested day tours, there will be three rubber boats legally operating picnic tours to Milolii and Nualolo Kai beaches by mid-August, 1978. Between that time and the end of the season (say September 10), there could be a maximum of 540 day-users carried to these beaches (3 boats x 6/boat x 30 days). When all three boats are operating, one of the beaches would necessarily have two groups of six.

With the present low level of use at Milolii and Nualolo Kai beaches, it is unlikely that the three picnic groups would exceed the capacity of the existing pit privies (5 total).

It is possible that some tours will be conducted without DLNR approval, since there are more than three operators with rubber boats, who have conducted tours in the past. However, unauthorized tours will not go undetected, particularly by the captains operating legally. In such cases, the DLNR can take civil action, issuing a citation and bringing a court injunction against the offender. If the person continues to operate in defiance of the injunction, the court can take criminal action on a contempt of court charge, possibly resulting in a heavy fine or jail sentence. These penalties should serve to deter unauthorized commercial operations.

If both scenic tours are authorized, there would be a maximum of three trips three days of the week, and one trip on the remainder. The tours would originate at different locations in Hanalei (Island Voyager at the County Park and Pacific Seafarer at their above-described base of operations). Island Voyager is requesting two half-day tours three days per week, so they will generate more traffic on those days than Pacific Seafarer. Assuming two persons per auto, Island Voyager would generate approximately 48 vehicle trips (to and from Hanalei). Including traffic from Na Pali Zodiac (6 vehicle trips) and Pacific Seafarer (32 vehicle trips), there would be approximately 86 vehicle trips generated (43 autos), or an increase of approximately 4% over present traffic levels.

The potential for greater cumulative impacts can become significant if beach landings by helicopters are considered. The proposed boat tours are small operations with very little capacity, since it takes several hours to get to the landing areas. By contrast, the farthest beach is only a few minutes by helicopter from Princeville, so it is possible to put large groups on the beaches in a short time. At pre-

there are three helicopter firms taking scenic tours to the Na Pali Coast and elsewhere on Kauai. These firms have been required to obtain Conservation District Use Permits, so the environmental effects of their operations will soon be made public.

As noted above under "Growth-Inducing Impacts", the State has control over the number of people who are allowed to use the Na Pali Coast. The Division of Parks can therefore manage any cumulative impacts from the various proposed tours by limiting the number of passengers they can carry. These tours will not grow in the future unless permitted to do so by the Division of Parks. This control can be strengthened by establishing a concession arrangement with one or all of the operators, subject to frequent monitoring (see Chapter VI, Alternatives).

V. MITIGATION MEASURES

A. THE BASE OF OPERATIONS

During construction, noise and other inconveniences to nearby residents will be mitigated by limiting the hours of construction and following all other restrictions imposed by the construction permit.

River bank erosion will be controlled with the use of portable ladders in the loading and unloading of passengers. Boats will be operated at low speeds while in the Hanalei River to minimize propwash and wave generation, a measure that would also mitigate any adverse impacts on oopu spawning or other fisheries stemming from the tour operations.

The impact of the proposed action on traffic and parking conditions in Hanalei will be lessened by constructing an off-street parking lot at the base of operations. The location at the edge of town will keep the traffic generated by the proposed action away from Hanalei and points west.

The on-board location of the fuel intake and the ferrying of fuel to the boat in sealed containers are measures that minimize the risk of fuel spills. An alternative measure would be to take the boat to Nawiliwili for fueling.

B. THE BOAT TOURS

To avoid the impacts resulting from overnight camping, Pacific Seafarer has dropped plans to transport campers to the Na Pali Coast. Noise impacts will be minimized by standing off from the beaches (except for day-use landings at Milolii and Nualolo Kai). The 32-foot boat to be used for the offshore scenic tour is equipped with underwater exhaust ports for quiet operation.

Before taking a tour group out, Pacific Seafarer will conduct an orientation session at their base of operations. Any interpretive material developed by the State for the Haena-Na Pali State Park will

be utilized, as well as information compiled specifically for the tours. Picnic groups will be acquainted with the resources of the area and how they can protect those resources. Safety and health hazards will be emphasized, particularly the possible health hazards stemming from drinking stream water. Littering will not be tolerated, and space will be made available on each boat to carry out trash from the area.

Beach landings will only take place at spots approved by the Division of State Parks (assumed to be Milolii and Nualolo Kai). The boats will be operated by licensed captains and will be equipped with life preservers, radio equipment and other safety equipment. In the interest of safety, boat tours will only be conducted when weather or ocean conditions are favorable. The captain will stay with the picnic group at all times, to guard against hazardous activities or damage to archaeological sites. To avoid conflicts with hunters, use will be confined to the beaches during the hunting season (August to October). The picnic groups will not use fires except in designated fire pits.

VI. PROBABLE ADVERSE ENVIRONMENTAL IMPACTS
WHICH CANNOT BE AVOIDED

A. IMPACTS ON HANAIEI TOWN

Construction-related noise and minor inconveniences will be inevitable during the construction of the base of operations, but will be of short duration. Under full operating conditions, maximum automobile traffic generated by the base of operations would amount to an increase of one percent over current estimated average daily traffic levels on the adjoining portion of Kuhio Highway. Approximately 12 rubber boat trips per day will be made between the loading area and the river mouth, adding slightly to the boat traffic on the river.

The operations proposed by the other CDUA applicants will generate some further increase of traffic in Hanalei. As these operations will have no private off-street parking areas, they will have an adverse impact on available public parking to residents. Public beaches will be used for the loading and unloading of passengers by the other applicants.

B. IMPACTS ON THE NA PALI COAST

Any form of motorized transportation in the Na Pali Coast will be considered by some as an encroachment on the wilderness quality of the area. Measures will be taken by Pacific Seafarer to minimize this encroachment.

Although full liability insurance will be carried by Pacific Seafarer and every effort will be made to provide safe conditions, no absolute assurance of safety can be given in a setting such as the one found at the Na Pali Coast.

Damage to the area's archaeological and biological resources by Pacific Seafarer passengers is highly improbable to the constant supervision that will be provided by the boat captain.

VII. ALTERNATIVES TO THE PROPOSED ACTION

A. THE NO ACTION ALTERNATIVE

There are several variations of the No Action alternative, such as; prohibiting all commercial boat tours (including the one currently operating), denying all pending boat tour applications or denying only Pacific Seafarer's application. Any one of these decisions would reduce the number of day-users at Milolii and Nualolo Kai beaches, and would reduce the number of boats passing along the Na Pali Coast. This would be perceived as a beneficial result by many of the hikers using the Kalalau Trail, to the extent that it would enhance their wilderness experience. The No Action alternative for this project would not preclude helicopters or non-commercial boats from using the Na Pali Coast.

There would be several disadvantages with this alternative. First, denying all boat tours would make the spectacular scenic aspects of the Na Pali Coast, as seen from the sea, available only to those able to travel to the area in private vessels. Second, the coast beyond Kalalau would only be accessible to the public by helicopter. Third, denying the proposed tours would cause Pacific Seafarer Inc. to go out of business. Denying all boat tours would similiarly affect the other operators. The impact of this on the Hanalei community would be to forego the economic benefits stemming from the operation of one or more locally based small businesses.

The proposed tours (Pacific Seafarer's and the others) are carrying relatively small numbers of people to beaches that are not heavily used. The major management problems on the Na Pali Coast stem from heavy use of the two most accessible areas, Hanakapiai and Kalalau. Denying day-use boat tours to Milolii and Nualolo Kai would not deal with this problem, and could even aggravate it, since the boat tours provide an alternative to hiking.

B. POSTPONE ACTION

This alternative would prohibit any boat tours or landings until the Division of State Parks completes its study of the Na Pali Coast and

decides on a management plan for the area. As this is a time consuming process, the economic impact of this alternative would be similar to the No Action alternative. As a variation of this alternative, the State could allow Pacific Seafarer, and/or the other parties proposing tours of the Na Pali Coast, to operate on a temporary experimental basis, pending adoption of a permanent management plan for the area. The operations would be revokable at any time and could be of help to the State in evaluating baseline data for the area and in formulating management policies. No irrevocable adverse impacts to the Na Pali Coast would result from this course of action.

C. SCENIC BOAT TOURS WITH NO LANDINGS PERMITTED

This alternative would allow the State to limit the number and frequency of boat tours of the Na Pali Area. Boat operators could be directed to stay sufficiently away from the coast so as to be noiseless and inconspicuous from the shoreline. The advantage of this alternative would be to make the visual enjoyment of the area as seen from the sea available to the public without any impact on the Na Pali Coast. With no beach landings, there would be no threat to the archaeological sites or other resources of the Na Pali Coast.

Disadvantages of this course of action would be to make the coast beyond Kalalau inaccessible, except by helicopter. The State would also forego the assistance from boat operators in hauling refuse out of the area.

D. BOAT TOURS, DAY USE BEACH LANDINGS AND CAMPER DROPOFFS PERMITTED

Under this alternative the State would permit boat operators to drop off campers for overnight stays at different locations along the Na Pali Coast, as well as allow day-use landings for supervised group picnics on selected beaches. Advantages would include the opportunity for persons to camp in areas of the coast currently inaccessible by

trails, or accessible only by long hikes on the Kalalau trail. The disadvantages of this alternative, as expressed by several agencies consulted in the preparation of this EIS, center on the cumulative impacts that overnight campers arriving by boat would have on the area's resources, when the increasing trail usage of the area by hikers is considered. Based on these potential adverse impacts, Pacific Seafarer decided against proceeding with this alternative by not including overnight camper dropoffs in its proposed action.

E. STATE-CONTROLLED CONCESSION

It has been suggested, by some of the agencies that reviewed the applicant's CDUA and Environmental Impact Statement Notice of Preparation, that the State could consider establishment of a concession-type arrangement with one or more of the parties proposing to conduct operations in the Na Pali Coast. Under this arrangement the tour operator or operators would be required to post a bond and would conduct operations under strict guidelines and close monitoring by the State. The State could select one or more of the applicants to conduct scenic tours, beach landings or camper dropoffs. This is essentially the current relationship between the Division of State Parks and Na Pali Zodiac.

Another course of action that has been suggested, is for the State to restore the old Hanalei landing, which is not operable due to its poor state of repair. The Hanalei Landing could then be operated and maintained under a concession arrangement by the different boat operators. The advantage of this proposal would be the availability of a convenient base of operations for tours of the Na Pali Coast. However, the cost of restoration would be considerable, and the presence of this facility would probably serve to attract a significant number of visitors to the area, an impact which would be considered undesirable by the majority of Hanalei's population.

F. DELETE BASE OF OPERATIONS

To eliminate conflicts with other boaters, and to avoid the establishing of a possible "tourist attraction" in Hanalei, the proposed base of operations on the Hanalei River behind the Dolphin Restaurant could be eliminated. The boats would then be loaded from the beach at Hanalei or Haena (not Kee Beach), wherever permitted by the County and/or the State. The disadvantage of this alternative is that it would require the use of public facilities for parking, etc. However, the State has approved a similar action in the case of Na Pali Zodiac. This alternative, in conjunction with Alternative "C" (scenic tour only), would have the least possible impact on the Na Pali Coast (short of "No Action").

VIII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM
USES AND LONG-TERM PRODUCTIVITY

The present "productivity" of the Na Pali area includes forest reserve, wildlife habitat, archaeological district and recreation. The area supports rare and endangered plants and animals, and undisturbed habitats that are valuable for scientific study. In easily quantifiable terms (number of users or economic returns), recreation is the most important "product" of the area, and consists both of active enjoyment by hikers, hunters and boaters, and passive enjoyment by boat or helicopter passengers.

The proposed scenic boat tours will in no way affect the natural or cultural resources of the Na Pali Coast. They will enhance the passive recreational use of the area, but may detract from the wilderness experience of the area for some users. The day-use picnic tours have the potential for damage to the natural or cultural resources, but this will be mitigated by the close supervision of the boat operator. They will also enhance both active and passive recreational enjoyment of the Na Pali Coast.

IX IRREVERSIBLE AND IRRETRIEVABLE
COMMITMENTS OF RESOURCES

A. THE HANA LEI TOWN AREA

The proposed action at the base of operations, the lower Hanalei River and surrounding areas, will not involve the irreversible and irretrievable commitment of resources other than the private capital, labor and energy required to construct, operate and maintain the base of operations. No biological, physical or socioeconomic resources in the Hanalei Area would be jeopardized or compromised by the proposed action.

B. THE NA PALI COAST AREA

Strict adherence to the regulations imposed by the Department of Land and Natural Resources, should not result in any irreversible or irretrievable commitment of resources or deterioration of the environment of the Na Pali area. All groups landing on beaches for daytime picnics will be under the supervision of Pacific Seafarer personnel to insure that no damage, inadvertent or otherwise, is done to the resources of the Na Pali Coast.

REFERENCES

- Anderson, R. N., J. C. Barrow and W. G. Marders, 1972.
Hanalei Development Plan, A Socioeconomic Prelude.
Department of Agriculture and Resource Economics,
College of Tropical Agriculture, University of Hawaii
- Division of State Parks, Department of Land and Natural Resources, 1977.
Haena-Na Pali Coast, Environmental Impact Statement
Notice of Preparation
- Loomis, Harold G., 1976
Tsunami Wave Runup Heights in Hawaii.
Hawaii Institute of Geophysics Report HIG-76-5
- St. John, Harold, 1975.
"Ethnobotany and Flora of Nualolo, Kauai."
Bul. Pacific Tropical Botanical Garden 5(2):24-28.
- U.S. Army Corps of Engineers and State of Hawaii
Department of Land and Natural Resources, 1973.
Flood Hazard Information, Island of Kauai.
- U.S. Department of Transportation and State of Hawaii
Department of Transportation, 1977
Kauai Belt Road, Kalihiwai to Haena Section,
Administrative Action Draft Environmental Statement
- U.S. Geological Survey, 1975
Water Resources Data for Hawaii and Other Pacific Areas

APPENDIX A

ORGANIZATIONS AND PERSONS CONSULTED

APPENDIX A PARTIES CONSULTED FOR THE
PREPARATION OF THE EIS

	<u>Comment Date</u>
A. <u>FEDERAL GOVERNMENT</u>	
U. S. Army Engineer District, Honolulu	5/31 & 6/7/78
USDI Fish and Wildlife Service	6/2/78
USDA Soil Conservation Service	6/6/78
U. S. G. S., Water Resources Division	No Comment
U. S. Coast Guard	No Comment
B. <u>STATE OF HAWAII</u>	
Dept. of Health	6/1/78
Dept. of Land and Natural Resources	No Comment
Dept. of Planning and Economic Development	5/17/78
Dept. of Transportation	6/8/78
University of Hawaii	
Water Resources Research Center	5/22/78
Environmental Center	6/1/78
C. <u>COUNTY OF KAUAI</u>	
The Hon. Eduardo Malapit, Mayor	No Comment
Dept. of Economic Development	No Comment
Dept. of Public Works	5/23/78
Planning Department	No Comment
D. <u>OTHERS</u>	
Hanalei Community Association	No Comment
Kauai Community Research Group	No Comment
The Kauai Outdoor Circle	6/19/78
Shoreline Protection Alliance	No Comment
Helen C. Hopkins, Life of Land & Sierra Club	6/1/78
John Moriyama, Leeward C. C.	No Comment
David S. Boynton, Sierra Club	No Comment



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
BUILDING 230
FT. SHAFTER, HAWAII 96858

PODCO-0

31 May 1978

Mr. Thomas Hegarty, Vice-President
Pacific Seafarer, Inc.
P. O. Box 385
Hanalei, Hawaii 96714

Dear Mr. Hegarty:

We are withdrawing your application for a permit to construct a floating boat dock in the Hanalei River, Kauai, File No. PODCO-0 1449-S, as requested by your letter of 25 May 1978. Processing of the application has been terminated and a permit will not be issued for the boat dock.

Your proposal to load passengers directly from the riverbank into rubber boats does not involve any work or structures in navigable waters, nor any discharge of dredged or fill material into waters of the United States. Consequently, a Department of the Army permit is not required.

Sincerely yours,

A handwritten signature in cursive script that reads "B. R. Schlapak".

B. R. SCHLAPAK
Lt Col, Corps of Engineers
District Engineer

Copies furnished:
County of Kauai Planning Department
State Department of Land & Natural Resources, Honolulu



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
BUILDING 230
FT. SHAFTER, HAWAII 96858

PODED-PV

7 June 1978

Mr. Fred L. Proby
Chief Environmental Scientist
VTN Pacific
1164 Bishop Street, Suite 906
Honolulu, Hawaii 96813

Dear Mr. Proby:

We have reviewed the Environmental Impact Statement (EIS) Preparation Notice for a Boat Dock and Beach Landings at Hanalei and Na Pali, Kauai, which you have prepared for your client Pacific Seafarer, Inc. We understand that Pacific Seafarer, Inc., has withdrawn its plans to construct a boat dock, and that passenger loading will take place directly from the river bank.

The following comments are offered for your consideration in preparation of the draft EIS:

a. Our records indicate that the U.S. Army Corps of Engineers has not conducted clearing of hau trees along the banks of the Hanalei River, as your EIS preparation notice suggests on page 10.

b. Potential secondary and cumulative impacts of the proposed project have not been addressed in the EIS preparation notice. Specifically, the draft EIS should consider the impacts of increased recreational boating on endangered waterbirds and the integrity of the Hanalei National Wildlife Refuge, on river fisheries and fishing activities, on existing recreational uses of the terminal reach of the river, and on stream bank erosion in the lower course of the river. Additionally, secondary impacts of increased visitor access to the remote, pristine watersheds along the Na Pali coast (such as construction of unauthorized dwellings and structures, unauthorized camping, trespassing, littering, pollution of streams, unauthorized introduction of exotic organisms into streams, and accidental or intentional dispersal of noxious plants) should be assessed in the draft EIS.

c. The discussion of alternatives to the proposed project should be expanded to include an assessment of taking no action and the impacts of this alternative on the part of the applicant. We also suggest that

7 June 1978

PODED-PV

Mr. Fred L. Proby

consideration be given to the creation of a single dock structure not located in the Hanalei River which may be utilized and maintained by several small charter boat operators. Such cooperative or group use of a single berthing facility, in lieu of individual proprietor use facilities, in this case, may be desirable in that secondary adverse impacts associated with a proliferation of small boat docks in the Hanalei River would be minimized.

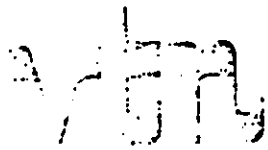
d. Hanalei Bay is not considered to be an all-weather harbor. Tsunami runup heights at the existing pier in Hanalei Bay were recorded at 12 feet in 1946, 17 feet in 1957, and 7.5 feet in the 1960 seismic waves. Damage sustained during the 1946 and 1957 events by the town of Hanalei and by structures situated along the lower Hanalei River totalled over \$300,000. Furthermore, North Pacific waves produced by Aleutian or mid-latitude storms may strike the Hawaiian Islands throughout the year, but are largest and most common from October through May. Northern storm swells typically have periods of 10 to 15 seconds and heights of 8 to 14 feet (which increase with proximity to the shore), and then prevent safe moorage in Hanalei Bay. The proposed passenger loading and visitor orientation area behind the Dolphin Restaurant are located within a flood-prone area. Flood levels of 1 to 2 feet above floor level have been reported from the Hanalei Trader general store, and in excess of 10 feet above mean sea level at the highway bridge. The draft EIS should discuss how the applicant intends to protect the 32-foot tour vessel, the Zodiac-type boats, and the visitor orientation facilities from damage or loss due to tsunamis, storm waves and flooding.

Thank you for the opportunity to review this EIS preparation notice. We would appreciate receiving notification should the applicant wish to continue and/or modify his plans to construct a boat dock.

Sincerely yours,

B. R. Schlapak

B. R. SCHLAPAK
Lt Col, Corps of Engineers
District Engineer



Engineers • Architects • Planners

June 29, 1978

1124 Sisnoo Street
Suite 906
Honolulu, Hawaii 96813
(808) 521-5651

Col. B. R. Schlapak
U. S. Army Engineer District, Honolulu
Bldg 230
Fort Shafter 96858

Subject: EIS Preparation Notice for
Pacific Seafarer Inc. Boat Tours,
Hanalei to Na Pali Coast, Kauai

Dear Col. Schlapak:

Thank-you for your comments of June 7, 1978 on the subject EIS
Preparation Notice. The forthcoming EIS deals with your comments
as follows:

Hau Trees - Reference deleted

Wildlife - See pages 13-15, 20 and 26 of the EIS,
and the letter of June 2, 1978 from the U. S. Fish and
Wildlife Service in Appendix A of the EIS.

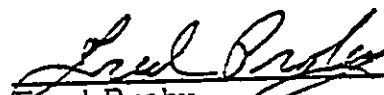
Present Uses of River - See page 20 of the EIS.

Impacts on Na Pali Coast - See pages 21-29 of the EIS.

Alternatives - See pages 33-35 of the EIS.

Water Hazards - See pages 12, 13 and 25 of the EIS.

Sincerely,


Fred Proby
Chief Environmental Scientist

FP:db



United States Department of the Interior

FISH AND WILDLIFE SERVICE
300 ALA MOANA BOULEVARD
P. O. BOX 50167
HONOLULU, HAWAII 96850
Division of Ecological Services
Room 5302

IN REPLY REFER TO:

ES

June 2, 1978

VTN Engineers, Architects, Planners
1164 Bishop Street, Suite 906
Honolulu, Hawaii 96813

Re: Pacific Seafarer
Na Pali Coast Tours

Dear Sir:

This replies to your letter of May 30, 1978 concerning the EIS Notice of Preparation for Pacific Seafarer, Inc.'s proposed boat dock and beach landing, Hanalei River to Na Pali Coast, Kauai, Hawaii.

You have indicated that the scope of operation originally planned, as indicated in the preparation notice dated May 1978, has been reduced in scope as follows: No dock would be constructed in the River by the Dolphin Restaurant loading area; passengers would be loaded into rubber Zodiac-type boats from the river bank, carried downstream, and transferred to a 32-foot vessel anchored in Hanalei Bay for tours along the Na Pali Coast. In addition, we understand that no tours will be conducted upriver from the loading dock.

We are specifically concerned with the latter activity as upriver boating would have an impact on the Hanalei National Wildlife Refuge program by creating continuous disturbances to endangered waterbird species in the area. However, since no tours will be in this area of the river, no impact is anticipated.

One final concern is the potential river bank erosion that could occur as a result of excessive wave wash from boating



A-6

Save Energy and You Serve America!

operations in the area. Resultant siltation and turbidity would definately have an adverse impact on fish and wildlife resources. Therefore, if boating speeds are slow, wave wash and erosion would be minimized.

If we can be of additional assistance, please let us know.

Sincerely yours,

Maurice H. Taylor
Field Supervisor

cc: HA
RF, Hawaii
HDF&G
DLNR



Engineers • Architects • Planners

June 29, 1978

1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813
(808) 521-5651

Mr. Maurice H. Taylor
U. S. Fish and Wildlife Service
Division of Ecological Services
P. O. Box 30167
Honolulu, Hawaii 96850

Subject: EIS Preparation Notice for
Pacific Seafarer Inc. Boat Tours,
Hanalei to Na Pali Coast, Kauai

Dear Mr. Taylor:

Thank-you for your comments of June 2, 1978 on the subject EIS Preparation Notice. As suggested, the boats will cruise at low speeds in the Hanalei River to minimize waves and propwash. To further protect the river bank, a portable ladder or gangplank will be used for loading.

Sincerely,

Fred Proby
Chief Environmental Scientist

FP:db

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

P. O. Box 50004, Honolulu, HI 96850

June 6, 1978

Mr. Fred Proby
Chief Environmental Scientist
VTN Pacific, Inc.
1164 Bishop St., Suite 906
Honolulu, HI 96813

Dear Mr. Proby:

Subject: EIS Notice of Preparation for Boat Dock and Beach Landings,
Hanalei River-Na Pali Coast, Hanalei, Kauai, Hawaii

We reviewed the subject EIS and followup letter, and have no comments
to offer.

Thank you for the opportunity to review the documents.

Sincerely,

Donald A. Miss, Acting

Jack P. Kanalz
State Conservationist



GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P O. Box 3378
HONOLULU, HAWAII 96801

June 1, 1978

Rec VTN 6/15/78

GEORGE A. L. YUEN
DIRECTOR OF HEALTH

Audrey W. Mertz, M.D., M.P.H.
Deputy Director of Health

Henry N. Thompson, M.A.
Deputy Director of Health

James S. Kumagai, Ph.D., P.E.
Deputy Director of Health

In reply, please refer to:

File: EPMS - SS

Mr. Fred L. Proby
Chief Environmental Scientist
VTN Pacific
1164 Bishop St., Suite 906
Honolulu, Hawaii 96813

Dear Mr. Proby:

Subject: Request for Comments on Proposed Environmental Impact Statement
(EIS) for a Boat Dock and Beach Landings, Hanalei River, Na Pali
Coast, Kauai

Thank you for allowing us to review and comment on the subject proposed
EIS. We submit the following comments for your consideration:

1. The applicant proposes beach landing at various sites along the Na Pali Coast for picnics, valley hikes and dropping off and taking out campers and backpackers. The Department of Health is strongly opposed to the approval of these activities in the Na Pali Coast area. Our concern is based on the following reasons:
 - a. Lack of potable water systems in the subject areas. Currently, visitors are warned to boil or properly disinfect the water before drinking.
 - b. Our estimation is that the current methods of sewage, solid waste and litter disposal are not adequate to handle additional influx of visitors to the Na Pali Coast.
2. No sewage, whether purified or not, shall be discharged into the Class AA waters of Kauai as defined in Chapter 37-A, Water Quality Standards, State Public Health Regulations.
3. The subject document does not adequately cover the environmental impact of commercial tours into the Na Pali Coast area on the present limited methods of sewage, solid waste, and litter disposal.

Mr. Fred L. Proby

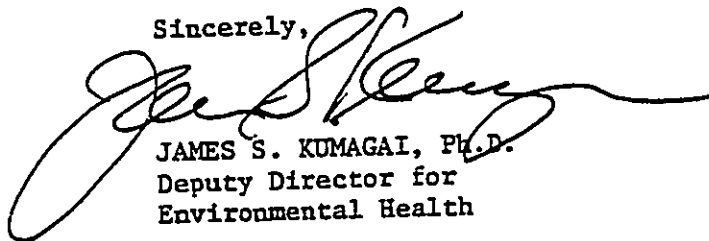
-2-

June 1, 1978

4. The subject document does not cover the impact on the water quality of the Class AA waters which will be affected by the proposed boating operation.

We realize that the statements are general in nature due to preliminary plans being the sole source of discussion. We, therefore, reserve the right to impose future environmental restrictions on the project at the time final plans are submitted to this office for review.

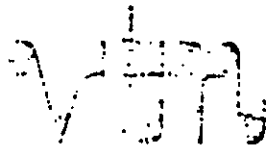
Sincerely,



JAMES S. KUMAGAI, Ph.D.
Deputy Director for
Environmental Health

cc: DHO, Kauai

A-11



Engineers • Architects • Planners

June 29, 1978

1164 Bishop Street
Suite 306
Honolulu, Hawaii 96813
3031 521-5651

Dr. James S. Kumagai
P.O. Box 3378
Honolulu, Hawaii 96801

Subject: EIS Preparation Notice for
Pacific Seafarer Inc. Boat Tours,
Hanalei to Na Pali Coast, Kauai

Dear Dr. Kumagai:

Thank-you for your comments of June 1, 1978 on the subject EIS Preparation Notice. The forthcoming Environmental Impact Statement deals with your concerns as follows:

Portable Water - See pages 18, 24 and 31 of the EIS.

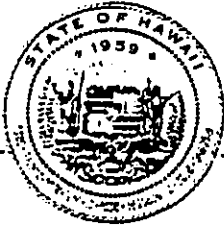
Sewage, Solid Waste and Litter - see pages 18, 24, 28 and 31 of the EIS.

Discharge into Class AA Waters. - See page 24 of the EIS.

Sincerely,

Fred Proby
Chief Environmental Scientist

FP:db



DEPARTMENT OF PLANNING
AND ECONOMIC DEVELOPMENT

Kamamalu Building, 250 South King St., Honolulu, Hawaii • Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

GEORGE R. ARIYOSHI
Governor

HIDETO KONO
Director

FRANK SKRIVANEK
Deputy Director

May 17, 1978

Ref. No. 6402

Mr. Fred L. Proby
Chief Environmental Scientist
VTN Pacific, Engineers and Planners
1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813

Dear Mr. Proby:

Subject: EIS Preparation Notice
Boat Dock and Beach Landings
Hanalei, Kauai

We offer the following comments regarding the above subject:

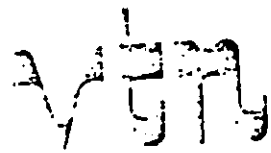
1. Since the proposed floating dock will project approximately 20 feet into the river from the water's edge, and the 32-foot boat will possibly require another 10 feet when docked, will the situation adversely affect boat traffic along this portion of Hanalei River?
2. Is Pacific Seafarer, Inc., the owner of the portion of the Hanalei River proposed for the construction of the four pilings and the floating dock? If not, has authorization been sought or secured for the construction of the facility?

Thank you for the opportunity to review the proposal.

Sincerely,



HIDETO KONO



Engineers • Architects • Planners

1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813
(808) 521-5651

May 30, 1978

Mr. Hideto Kono
State of Hawaii
Department of Planning and
Economic Development
P.O. Box 2359
Honolulu, Hawaii 96804

Subject: EIS Preparation Notice
Boat Dock and Beach Landings
Hanalei, Kauai

Dear Mr. Kono:

Thank you very much for your prompt attention to the subject Preparation Notice. I am writing in response to your comments, and to inform you of the changes that Pacific Seafarer, Inc. has made in this proposed project.


The major change in the project affecting your comments is the deletion of the floating dock in the Hanalei River. We were informed by the Corps of Engineers that such a dock might interfere with the flood control improvements contemplated for the lower Hanalei River. Passengers will now be loaded into rubber boats directly from the river bank adjacent to the proposed parking lot behind the Dolphin Restaurant. Since no structures will be placed in the river, the issues of clearance and ownership are not of concern.

TO: Mr. Kono
Page Two
5/30/78

Pacific Seafarer, Inc. has also dropped plans to carry overnight campers to the Na Pali Coast. The only tour operations now proposed are a day-use picnic tour with a maximum capacity of 12 persons per day (more likely 50-70 persons per week), and a scenic tour without beach landings.

We welcome any additional comments that you might have on the project as now proposed.

Sincerely,


Fred L. Proby
Chief Environmental Scientist

FLP:dk

cc: DLNR
EQC

GEORGE R. ARIYOSHI
GOVERNOR



RYOKICHI HIGASHIONNA, PH.D.
DIRECTOR

DEPUTY DIRECTORS
WALLACE ACKI
DOUGLAS S. SAKAMOTO
CHARLES D. SWANSON

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
460 BUNOHOWAL STREET
HONOLULU, HAWAII 96813

IN REPLY REFER TO

June 8, 1978

WT-EP 5184

Mr. Fred L. Proby
Chief Environmental Scientist
VTN Pacific, Inc.
1164 Bishop Street
Suite 900
Honolulu, Hawaii 96813

Dear Mr. Proby:

Subject: EIS Notice of Preparation for a
Boat Dock and Beach Landings,
Hanalei River - Na Pali Coast, Kauai

Reference is made to your letters of May 12, 1978 and
May 30, 1978, regarding the subject matter.

We have reviewed the modified proposal and find no
objections to Pacific Seafarer, Inc., conducting boat charter
tours as described in the notice. Our only direct interest
lies in navigational regulations which must be obeyed by tour
operators.

Thank you for this opportunity to provide comments.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. Higashionna".
R. Higashionna

VITA
Engineers • Architects • Planners

1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813
(808) 521-5651

June 29, 1978


Mr. R. Higashionna
State of Hawaii
Department of Transportation
369 Punchbowl Street
Honolulu, Hawaii 96813

Subject: EIS Preparation Notice for
Pacific Seafarer Inc. Boat Tours,
Hanalei to Na Pali Coast, Kauai

Dear Mr. Higashionna:

Thank-you for your comments of June 8, 1978 on the subject EIS
Preparation Notice. Please be assured that Pacific Seafarer Inc.
will observe all navigational regulations in the conduct of their tours.

Sincerely,


Fred Proby
Chief Environmental Scientist

FP:db

UNIVERSITY OF HAWAII

Water Resources Research Center

Office of the Director

May 22, 1978

Mr. Fred L. Proby
Chief Environmental Scientist
VTN Pacific
1164 Bishop Street, Suite 906
Honolulu, Hawaii 96813

Dear Mr. Proby:

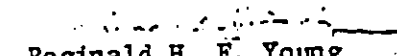
Re: EIS Preparation Notice for Hanalei River Boat Dock
and Na Pali Coast Beach Landings, May 1978

We have reviewed the subject Notice with great interest. We urge that every effort be made to minimize the impact on the environment of visitors to the Na Pali Coast as indicated in the first two paragraphs on p. 15.

We are concerned that insufficient attention has been given to the management of waste waters in the proposed operation. Where will the holding tank for the 32-foot craft (p. 15, 2 P) be discharged? What is the capacity of the existing household septic tank and will it be able to accommodate the increased load of visitor operations? What is the history of septic tank and leaching field operations--have there been any problems with this site in the Hanalei River flood plain?

We appreciate the opportunity to review this Notice and look forward to reviewing the completed EIS.

Sincerely,


Reginald H. F. Young
Asst. Director, WRRC

RHFY:jmn

cc: Env. Ctr.

A-18

2540 Dole Street - Honolulu, Hawaii 96822


Engineers • Architects • Planners

1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813
(808) 521-5651

May 31, 1978

Mr. Reginald H. F. Young
University of Hawaii
Water Resources Research Center
2540 Dole Street
Honolulu, Hawaii 96822

Subject: EIS Preparation Notice
Boat Dock and Beach Landings
Hanalei, Kauai

Dear Mr. Young:

Thank you very much for your prompt attention to the subject Preparation Notice. I am writing in response to your comments, and to inform you of the changes that Pacific Seafarer, Inc. has made in this proposed project.

Two major changes in this project have been made: the floating dock has been deleted and no campers will be landed on the Na Pali Coast. The dock was eliminated when we were informed by the Corps of Engineers that such a dock might interfere with the flood control improvements contemplated for the lower Hanalei River. Passengers will now be loaded into rubber boats directly from the river bank adjacent to the proposed parking lot behind the Dolphin Restaurant. The only tour operations now proposed are a day-use picnic tour with a maximum capacity of 12 persons per day (more likely 50-70 persons per week), and a scenic tour without beach landings.

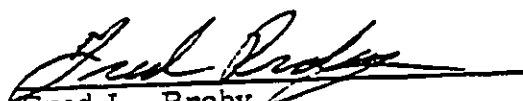
In answer to your question on sewage disposal for the 32-foot boat, it is equipped with a "Lecta-San" system that electronically purifies the wastes. This is a flow through system that has received Coast Guard "Type 2" approval, and does not require a holding tank. However, for added

TO: Mr. Young
Page Two
5/31/78

protection, a holding tank will be used for nearshore operations. The septic system at the proposed ticket office will be discussed in detail in the EIS.

We welcome any additional comments that you might have on the project as now proposed.

Sincerely,


Fred L. Proby
Chief Environmental Scientist

FLP:dk

cc: DLNR
EQC



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7381

Office of the Director

June 1, 1978

Mr. Fred L. Proby
Chief Environmental Scientist
VTN Pacific
1164 Bishop St., Suite 906
Honolulu, Hawaii 96813

Dear Mr. Proby:

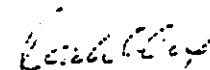
EIS Preparation Notice for Boat Dock and
Beach Landings, Hanalei River, Kauai

Thank you for sending us a copy of the above cited preparation notice and your letter of May 30, 1978. We do not, in general, participate in the preparation stage of the EIS process. We have taken this position so as not to be in conflict with our later review responsibilities, nor in apparent competition with private consultants.

Since we had been asked to participate in the reviews of several Conservation District Use Applications for similar projects we are enclosing a copy of our earlier correspondence to Mr. Richard O'Connell, Director, OEQC, noting our concerns about these projects. You may find some of our comments useful.

We are extremely pleased that an EIS is being prepared for this and other similar projects.

Sincerely,


Doak C. Cox
Director

Enclosure

cc: George Balazs
Tim Smith
Lou Herman
Alison Kay
Barbara Vogt
Marge Kimmerer

A-21

AN EQUAL OPPORTUNITY EMPLOYER



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361

Office of the Director

April 20, 1978

Mr. Richard O'Connell
Director
Office of Environmental Quality Control
550 Halekiauila Street, #301
Honolulu, Hawaii 96813

Dear Mr. O'Connell:

Private Commercial Recreational Use, Hanalei
Na Pali, Kauai

We understand that three conservation district use applications are currently pending before DLNR for permits to operate commercial, beach landing, scenic tours with "zodiacs" along the Na Pali Coast. We have also noted the EIS Preparation Notice for the Haena-Ma Pali Coast Recreation Plan (December, 1977).

The beauty and recreational attributes of the Na Pali Coast are unsurpassed and of statewide recognition and concern. We are pleased to note the general tenor of the EIS Preparation Notice document which, at this preparation stage, outlines the concerns, plans and monitoring considerations for the area.

The Environmental Center does not usually take part in the Preparation stage of the EIS, so as not to be in conflict with our later review responsibilities nor in apparent competition with private consultants. However, members of the University have expressed concern regarding some aspects of the recreational planning for this coastline which we should call to your attention.

The basic concern for the Na Pali Coast in general is one of care and conservation to protect the natural environment of the area. The present minimally regulated operation of zodiacs and helicopters into the area combined with the ever-increasing usage by hikers promotes the recognized problems of litter, sanitation, water supply, and potential destruction of natural and archaeological resources. An area of concern perhaps not recognized is the impact of increased traffic along and to the shoreline on the endangered green sea turtle, humpback whale, and opihi populations. In the case of the sea turtles, they are known to frequent the shoreline along this region and, if undisturbed, could nest along the more inaccessible beaches. Because they come ashore at night to nest and lay their eggs, it is of particular importance that possible restrictions of night time usage of potential nesting sites be considered.

A-22

AN EQUAL OPPORTUNITY EMPLOYER

Mr. Richard O'Connell

- 2 -

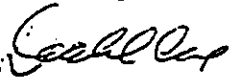
April 20, 1978

We recognize the difficulties in monitoring such usage but perhaps the location and design of support facilities could be such to encourage camping away from the primary potential nesting sites.

Because the major consideration in the management of any recreational area is the population it can and will serve, it seems quite essential to us that the EIS be finalized prior to negotiating a decision on the various applications for commercial boat service to the area.

We would appreciate being kept informed of the status of permit actions in this area. If we can be of further assistance in compiling data on the natural resources, plants, animals, archaeological sites, etc., please don't hesitate to call.

Yours truly,


Doak C. Cox
Director

DCC:omb

cc: William Thompson

V.A.P.A.
Engineers • Architects • Planners

1164 Bishop Street
Suite 308
Honolulu, Hawaii 96813
(808) 521-5651

June 29, 1978

Mr. Doak C. Cox
Environmental Center
Crawford 317 - 2550 Campus Road
Honolulu, Hawaii 96822

Subject: EIS Preparation Notice for
Pacific Seafarer Inc. Boat Tours,
Hanalei to Na Pali Coast, Kauai

Dear Mr. Cox:


Thank-you for your comments of June 1, 1978 relevant to the subject
EIS Preparation Notice. The concerns expressed to the OEQC are
discussed in the forthcoming EIS as follows:

Litter, Sanitation, Water Supply - see pages 18, 24, 28 and 31
of the EIS.

Archaeological Resources - see pages 16 and 27 of the EIS.

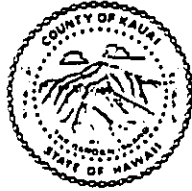
Endangered Species - see pages 13-15, 20 and 26 of the EIS.

Sincerely,


Fred Proby
Chief Environmental Scientist

FP:db

EDUARDO E. MALAPIT
Mayor



HENRY MORITA
County Engineer
Telephone 245-3318
HENRY MORITA
Dep. County Engineer
Telephone 245-3602

COUNTY OF KAUAI
DEPARTMENT OF PUBLIC WORKS
4396 RICE STREET
LIHUE, KAUAI, HAWAII 96766

May 23, 1978

Mr. Fred L. Proby
Chief Environmental Scientist
VTN PACIFIC
1164 Bishop Street - Suite 906
Honolulu, Hawaii 96813

SUBJECT: BOAT DOCK AND BEACH LANDINGS, HANAIEI RIVER - NA PALI
COAST, KAUAI


We have reviewed the EIS Notice of Preparation for the subject project. Our comments are limited to the Hanalei portion of the project as the Na Pali portion is controlled by the State Department of Land and Natural Resources.

We agree that public facilities are not appropriate for commercial operations. Therefore, if the subject concept is approved, private facilities must be utilized. There is no such private facility in the Hanalei area, to our knowledge.

The notice of preparation has discussed most of the items of our interest. We wish that the preparation notice includes restroom facilities discussions and further elaboration on land/river operations. Will there be measures installed to remove boats from the river to the shed? What happens to the porch and dock when the Hanalei River floods? Finally, will traffic generated by this operation affect the highway system? Note that the Hanalei River bridge is only one-lane and efforts are underway to improve it.

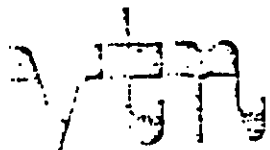
We hope our comments are of value.

Very truly yours,


HENRY MORITA
County Engineer

cc: Brian Nishimoto
Takeo Yamamoto

A-25



Engineers • Architects • Planners

1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813
(808) 521-5651

May 30, 1978

Mr. Henry Morita
County of Kauai
Department of Public Works
4396 Rice Street
Lihue, Kauai, Hawaii 96766

Subject: EIS Preparation Notice
Boat Dock and Beach Landings
Hanalei, Kauai

Dear Mr. Morita:

Thank you very much for your prompt attention to the subject Preparation Notice. I am writing in response to your comments, and to inform you of the changes that Pacific Seafarer, Inc. has made in this proposed project.

The major change in the project affecting your comments is the deletion of the floating dock in the Hanalei River. We were informed by the Corps of Engineers that such a dock might interfere with the flood control improvements contemplated for the lower Hanalei River. Therefore, passengers will now be loaded into rubber boats directly from the river bank adjacent to the proposed parking lot behind the Dolphin Restaurant.

Since no structures would be placed in the river, the present flooding situation will not be aggravated. There will be no provisions for taking boats from the river; should this be necessary, the ramp near the river mouth could be used. We are aware of the plans for the Hanalei Bridge. The proposed operation will not be oriented to bus tour groups, so the present restrictions for such vehicles crossing the bridge will not pose a problem. The project may attract additional auto or limosine traffic, but with the provision of a paved parking lot, disturbance to the community will be minimized. The location of this lot at the outskirts of town will further reduce the traffic impact. As requested, the EIS will elaborate

TO: Mr. Morita
Page Two
5/30/78

on the capacity of the existing septic system and other details of the proposed project.

For your information, Pacific Seafarer, Inc. has also dropped plans to carry overnight campers to the Na Pali Coast. The only tour operations now proposed are a day-use picnic tour with a maximum capacity of 12 persons per day (more likely 50-70 persons per week), and a scenic tour without beach landings.

We welcome any additional comments that you might have on the project as now proposed.

Sincerely,


Fred L. Probst
Chief Environmental Scientist

FLP:dk

cc: DLNR
EQC



P.O. BOX 218
LIHUE, HAWAII 96766

THE KAUAI OUTDOOR CIRCLE

June 19, 1973

Mr. Fred L. Proby
Chief Environmental Scientist
vtn
1154 Bishop Street, Suite 906
Honolulu, Hawaii 96813

Dear Mr. Proby:

Thank you for your request that we make comments on Pacific Seafarer, Inc.'s proposed commercial use of the MaPali Coast.

We do not feel that we have adequate time to research their outlined intentions but are pleased to see their concerns for protecting the wilderness aspects of the area, especially in regard to litter pickup.

I am enclosing a copy of our comments on the Ha'ena-Ma Pali Coast, Environmental Impact Statement, Notice of Preparation which was prepared by the Department of Land and Natural Resources. It shows our main areas of concern.

Sincerely,

The Kauai Outdoor Circle

Clare E. Miller

Clare E. Miller
President

The Kauai Outdoor Circle supports the conceptual plan Haena-Na Pali Parks as proposed by the Department of Land and Natural Resources, Division of State Parks in the Environmental Impact Statement in the Preparation Notice of December of 1977.

In specific areas the Kauai Outdoor Circle is supportive of the preservation of the archaeological regions of the Haena Park area, i. e. Lohi'au's Dancing Platform, the former mullat pond, and ancient housesites. The utilization of these historical areas of the park with self-guided tours, similar to Lanakahi State Park on Hawaii is further recommended.

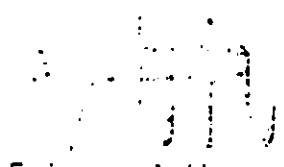
Protection of the sand dunes and shoreline vegetation of the Ke'e Beach region is of major concern to the Outdoor Circle. Boardwalks on the dunes to form a trail would be beneficial. Additionally, leaving the existing ironwood trees to filter out salt spray thereby aiding the growth of vegetation inland as well as providing a partial windbreak from the prevailing northeasterly trade winds is suggested.

A very positive aspect outlined in the conceptual recreation plan is that of containing vehicular traffic inland and away from beach sites. The Outdoor Circle favors having all motorized vehicles prohibited just past Limanuli Stream, thereby enhancing the spectacular backdrop for pedestrians in the Haena and Na Pali regions. A possible parking area could be in the cleared space below the entrance to the first Wet Cave. Facilities with information on hiking, natural history and archaeology could be situated adjacent to the parking area.

The Outdoor Circle of Kauai encourages the establishment of a Marine Life Conservation District at Ke'e Beach as a valuable example of reef fish and other marine species to be reserved for viewing only and not subject to consumptive use. Due to the proximity of the reef to the shore and the comparatively safe enclosed bay between the reef and shore, this site is an attractive asset for both visitors to Kauai and as a teaching field for Kauai's school children. Prohibiting all motorized vehicles from this

bay is necessary for safety practices for swimmers and increasingly important to maintain the diversity of both marine flora and fauna. Concurrently setting aside a portion of forest and dry cliff environments as proposed between the areas of Haena and Hanakoa into the Hawaii Natural Area Reserves System is recognized as equally important to preserve rare endangered botanical species. ~~There~~ almost 3,000 acres of forest habitat, and dry cliffside habitat in the smaller valleys are nearly undisturbed by grazing animals as yet and therefore have many endemic Hawaiian plants that are imperative to preserve in situ.

In summary, the Haena-Na Pali Coast State Parks, Environmental Impact Statement Preparation Notice has ample provisions for heightening the appreciation of the esthetic qualities of the northern reaches of Kauai while focusing on the varied needs of the public for recreational purposes. Perhaps while this comprehensive and carefully constructed plan is being implemented, portable restroom facilities (or any other lavatory design not dependent on a sewer system) could be installed this year before the heaviest influx of visitors during the summer months. The need for lavatory facilities is acute at the site where the Kuhio Highway ceases.



Engineers • Architects • Planners

June 29, 1978

1164 Bishop Street
Suite 906
Honolulu, Hawaii 96913
(808) 521-5651

Ms. Clare E. Miller
P.O. Box 218
Lihue, Kauai, Hawaii 96766

Subject: EIS Preparation Notice for
Pacific Seafarer Inc. Boat Tours,
Hanalei to Na Pali Coast, Kauai

Dear Ms. Miller:

Thank-you for your comments of June 19, 1978 relevant to the subject
EIS Preparation Notice. Pacific Seafarer Inc. shares your concern
for protecting the resources of the Na Pali Coast. We are looking
forward to your comments on the forthcoming EIS.

Sincerely,

Fred Proby
Chief Environmental Scientist

FP:db

June 1, 1978

VEN
1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813

Subject: EIS Notice of Preparation for Commercial Tour
Operations Hanalei to Nā Pali Coast and your
letter of May 30, 1978.

Gentlemen:

This is in response to your request for comments on the
above.

The Department of Land and Natural Resources (DLNR), Division of State Parks, held public hearings on development of a State park at Hā'ena - Nā Pali Coast, in Hanalei October 6 and in Lihue October 7, 1977. At both hearings there was strong emphasis from the public on keeping the Nā Pali Coast a wilderness area and restricting its use.

The DLNR Division of Parks, in its EIS Notice of Prep., dated December 1977, says regarding the Nā Pali Coast: "It will remain a roadless area with restricted access from the air and sea", (Pg. 5), and; "Presently the coast is accessible by trail, boat and helicopter. The two latter modes of access may be in conflict with a wilderness type of experience where there would be no possibility for motorized travel", (Pg. 6).

The results of the public hearing and the above statement from the DLNR Division of Parks bring up the question of why the Land Use Division okayed the Nā Pali Zodiac operation before the Parks Dept. completed an EIS on its plans. It was quite obvious that if one such operation was allowed officially, others would be applying for the same privilege. A logical conclusion is that either there is little interdepartmental dialogue going on in the DLNR, or that public sentiment is being ignored.

The comments by your company regarding the benefits, environmental affects, mitigation measures, alternatives to the proposal, etc., are necessarily predicated on arguments favorable to your client and any negative input received will in due time be overwhelmed by more such favorable arguments. In my experience as a lobbyist for the Sierra Club, Hawaii'i Chapter and for Life of the Land, I have not yet read an EIS that did not manage to

rationalize the action proposed by the client regardless of whether that client was in the private or public sector. However, I want to comment on the following factors:

The weather and seas are unpredictable along the Nā Pali Coast most of the year. Presumably the majority of the clients of a "scenic" tour would be tourists, most of whom would not be competent to take care of themselves in the water and many of whom would be small children or elderly persons. Engine failures and malfunctions have and are increasingly causing boating accidents in Hawai'i. Considering the number of people who would be transported to and along the Nā Pali Coast (and the number of operations allowed), if the DLNR allows several of the proposed applications, accidents would be inevitable.

Even in the calm months of the year, beach landings and take-offs with Zodiac-type boats are not always simple. The beaches on the Nā Pali Coast slope sharply into deep water and as a result there are alternate and strong low and high surges, which can make it difficult (particularly with an engine malfunction) to get out of and into the boats.

On Pg. 15 of your EIS Prep. Notice, first paragraph is: "Pacific Seafarer Inc.'s primary operating season will be from May through September." These months are normally considered to have calm seas, but there are exceptions. There is always the possibility of an unusually large swell, or wave which could surge into the caves along the coast, completely blocking entrances, or exits, and causing extremely dangerous conditions for boats inside the caves. If boats went into the caves at time other than these presumably safe months, it would be almost inevitable that this would happen.

With the increasing number of tourists who attempt to do things that put them in dangerous situations (perhaps unwittingly), there could be numerous suits for damages. This has happened in wilderness parks on the mainland. By legal definition the National Park Service "invites" people to places that are hazardous and the result has been constantly increasing amounts of money paid by the government to settle damage suits and for the cost of air rescues. Who would be liable for such possible suits and rescues on the Nā Pali Coast?

In regard to the environmental aspects of increased boat and helicopter service on the coast, the most objectionable aspect is that the area would no longer be a wilderness. Amenities alone, necessary to handle such increased use, would

destroy the wilderness concept. There are so many other experiences for visitors to Hawai'i that it should not be considered necessary to destroy a wilderness area in order to make it easily accessible to everyone. A wilderness experience does not just consist of being transported to a remote, uninhabited area---the most important thing is the wonderful experience of having done something difficult without the trappings of civilization. Will we leave any place for our young people to have this kind of experience?

Another concern is the very important archaeological digs on the Nā Pali Coast. With several boat tours plus the helicopter drops, policing and protecting these treasures would become very difficult. There are some people who manage to remove or destroy such things even under strictly controlled conditions. (I have even seen people shipping away at marble columns with hammers in the Acropolis in spite of the constant surveillance and patrolling of guards.)

This brings up a point that is of increasing concern and which may eventually have to be decided in the courts. Where does the right of private profit from the public domain begin and end? Since it is the people in general who, through their taxes, pay for the acquisition and maintenance of public property, do they have the right of opposing its use for the gain of a few? Yes, it can be said that those few are putting money into the coffers of the government, but is the small amount of money thus gained worth the possible destruction of what may be County, State and National treasures and wilderness areas.

There is no doubt in my mind, from their reaction, of how the people of Kaua'i feel in this instance. And, there should be no doubt in the minds of our elected and appointed officials.

Yours truly,

Helen C. Hopkins

For: Life of the Land
Sierra Club, Hawai'i Chapter

cc: Life of the Land
Sierra Club
Councilperson JoAnn Yukimura



Engineers • Architects • Planners

1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813
(808) 521-5651

June 6, 1978

Mrs. Helen C. Hopkins
P.O. Box 266
Hanalei, Hawai'i 96714

Subject: EIS Preparation Notice for:
Pacific Seafarer, Inc. Boat Tours
to the Nā Pali Coast, Kaua'i

Dear Mrs. Hopkins:

Your comments on the subject Preparation Notice are appreciated. We feel that you have raised several germane issues in your letter. We will touch briefly on these points in this letter, and go into more detail in the forthcoming EIS.

Sea Conditions and Safety. It is understood that the Nā Pali Coast can be very rough and dangerous for small craft. This is one of the factors that will limit the number of trips that Pacific Seafarer can make. You are also correct about the steepness of the beaches. However, Nu'alolo Kai and Miloli'i both have boat channels marked by the State, which make landings much safer than at the other beaches. It is anticipated that the DLNR will only allow landings at these locations. The boats will only be operated by experienced, Coast Guard-licensed captains. The safety of their passengers will be the boat operators' primary concern; there will be no foolhardy acts, such as entering the caves under adverse conditions. Furthermore, each boat will carry life preservers, a CB radio, flares, repair kit and other safety equipment.

While these factors do not eliminate the danger inherent in the proposed boat tours, they will reduce the probability of injury to the passengers. These tours are designed to be a stimulating outdoor experience and not intended for the average tourist. The risks, though controlled, are part of the wildland experience. As for liability, Pacific Seafarer, Inc. carries full liability insurance.

TO: Mrs. Hopkins
Page Two
6/6/78

Impact on Wilderness. Although they are both forms of motorized transport, the difference between the impact of helicopters and that of small boats is so great that the two should be discussed separately. Pacific Seafarer shares your concern for the preservation of the wildland character of the Na Pali Coast. For this reason, no amenities are being requested, and the group will carry out all of its trash. The proposed day-use tour is a small, personal operation. With two rubber boats, a maximum of 12 people per day can be carried. Poor weather and maintenance will bring the average closer to 6-10 people per day from May to September. The scenic tour will carry about 20 people per day. The cumulative maximum capacity of four day-use tour operators (Na Pali Zodiac, Hanes, Esposito and Pacific Seafarer), with a total of 7 boats (if all pending CDUA's were approved), would be 42 people per day. Again, the realities of a boat operation would reduce this capacity to an average of 20-35 people per day for the primary season. These people would be supervised day users who would have much less effect on the area than campers, or the unsupervised day users who now enter the area by trail in much larger numbers.

The carrying capacity of the Na Pali Coast, the uses that are appropriate and the means of access, are issues that will be addressed in the State's EIS for the Ha'ena-Na Pali State Park. Granting the tours requested by Pacific Seafarer would not necessarily foreclose management options, since permission to operate could be made subject to periodic review.

Archaeological Resources. We share your concern for the protection of the archaeological sites. This is one reason why the boat operator will remain with the group at all times. The State has contemplated the requirement of a bond to insure the boat operators' compliance with all applicable laws and restrictions. Since Pacific Seafarer will not be involved with camper drop-offs, they will have much more control over the activities of their passengers.

TO: Mrs. Hopkins
Page Three
6/6/78

We will make every effort to insure that the EIS is as impartial as possible. We thank you for your kokua, and hope that you will continue to contribute to this project.

Sincerely,


Fred Proby
Chief Environmental Scientist

FP:dk

cc: DLNR
EQC