



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

March 13, 1979

REF NO.: CPO-227
FILE NO.: KA-1056
KA-1060

Mr. Curtis Lofstedt
Kenai Air Hawaii
P.O. Box 381
Lihue, Kauai, HI 96766

Dear Mr. Lofstedt:

NOTICE OF ACCEPTANCE

This is to inform you that the Environmental Impact Statement (EIS) for Helicopter Landings on the Na Pali Coast, Kauai, Hawaii was accepted by default in that its acceptability or non-acceptability was not determined within the 60 day time period prescribed by Section 1:72c of the EIS Regulations. It is our understanding, after consulting with the Office of Environmental Quality Control, that the 60 day period expired on December 8, 1978.

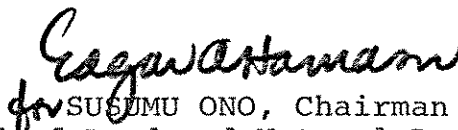
Be advised, however, that your conservation district use application for helicopter landings in conjunction with camper dropoffs and pickups is yet to be reconsidered by the Land Board as requested for in your letter of December 1, 1978. For your information, action to reconsider the Board's earlier denial of your application is pending a Special Management Area determination by the County of Kauai which is required under Section 205-29d, HRS relating to Interim Coastal Zone Management. The Department of Land and Natural Resource will be applying for this permit.



Mr. Curtis Lofstedt
Page 2
March 13, 1979

We are sorry for not informing you sooner and we apologize for any inconvenience caused. Should you have any questions, feel free to contact Messrs. Roger C. Evans or Len Bautista of our Planning Office at 548-7837.

Very truly yours,


for SUSUMU ONO, Chairman

Board of Land and Natural Resources

cc: All Board Members	DOH
Kauai Land Agent	DOT
Mr. Jeff Grad	OEQC/EOC
Mr. Fred Proby, VTN	COK/Planning Dept.
U.S. Fish & Wildlife	Federal Communications Commission

Office of Environmental Quality Control
Office of the Governor
550 Halekauwila Street
Tani Office Building, Third Floor
REVISED

ENVIRONMENTAL IMPACT STATEMENT

for

HELICOPTER LANDINGS on the NA PALI COAST

Papillon Helicopters, Ltd.
&
Kenai Air Hawaii, Inc.



NOTICE

ALL reference material borrowed from this library will be on a 30-day loan period, limited to ONE RENEWAL ONLY.

If borrowed material is not returned when DUE, is DAMAGED, or LOST, there will be a REPRODUCTION CHARGE OF 25¢ PER PAGE.

OEQC LIBRARY - PHONE 548-6915
550 HALEKAUWILA STREET ROOM 301

Office of Environmental Quality Control
Office of the Governor
550 Halekauwila Street
Tani Office Building, Third Floor
Honolulu, Hawaii 96813

REVISED
ENVIRONMENTAL IMPACT STATEMENT
FOR
HELICOPTER LANDINGS
ON THE
NA PALI COAST
Kauai, Hawaii

Applicants
Papillon Helicopters, Ltd.
and
Kenai Air Hawaii

Prepared By
VTN Pacific
1164 Bishop Street, Suite 906
Honolulu, Oahu, Hawaii 96813

November, 1978

HELICOPTER LANDINGS ON THE NA PALI COAST

REVISED

ENVIRONMENTAL IMPACT STATEMENT

November, 1978

PROJECT: Helicopter Landings

LOCATION: Na Pali Coast
Island of Kauai, Hawaii

APPLICANTS: Papillon Helicopters, Ltd.
P. O. Box 608
Hanalei, Kauai 96714

and

Kenai Air Hawaii
P. O. Box 381
Lihue, Kauai 96766

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
Telephone: 521-5651

SUMMARY

I. PROPOSED ACTION

The applicants are requesting permission to land helicopters at the following sites on the Na Pali Coast and vicinity: Kalalau Beach, Honopu Beach, Kokee Lodge, Awaawapuhi Valley, Nualolo Aina Valley, Nualolo Kai Beach, Milolii Beach and Polihale Beach. Since these sites are located within the Conservation District, and are managed by the State Department of Land and Natural Resources, the DLNR has required the applicants to file a Conservation District Use Application (CDUA). This EIS is part of the CDUA requirements for the proposed action.

II. DESCRIPTION OF THE ENVIRONMENT

The environment of the surrounding area is described in terms of the following criteria: general characteristics, access, use patterns, water resources, biological resources, history and archaeology.

III. RELATIONSHIP TO LAND USE PLANS, POLICIES AND CONTROLS

Discussion in this chapter focuses mainly on the relationship of the proposed helicopter landings to the "Haena - Na Pali Coast Recreation Plan".

IV. IMPACTS

Primary impacts considered are the numbers and distribution of people brought in by helicopter, the noise and visual intrusion of the helicopters and the benefits of the helicopter operations.

Secondary impacts addressed are health and safety, litter, archaeological sites, rare and endangered plants, wildlife disturbance and the "wilderness experience".

V. ALTERNATIVES

Four alternatives are considered: unrestricted landings, restricted landings, relocation of landing pads and no landings.

CONTENTS

<u>Chapter</u>		<u>Page</u>
I	DESCRIPTION OF THE PROPOSED ACTION	
	A. Introduction	1
	B. Helicopter Operations	1
	C. Requested Landing Sites	2
	D. Other Actions of a Similar Nature	12
II.	DESCRIPTION OF THE AFFECTED ENVIRONMENT	
	A. General Characteristics	13
	B. Access	14
	C. Use Patterns	15
	D. Water Resources	17
	E. Biological Resources	18
	F. History and Archaeology	20
III.	THE RELATIONSHIP OF THE PROPOSED ACTION TO LAND USE PLANS, POLICIES AND CONTROLS	21
IV.	PROBABLE IMPACTS OF THE PROPOSED ACTION	
	A. Primary Impacts	23
	B. Secondary Impacts	34
V.	MITIGATION MEASURES	
	A. Primary Impacts	37
	B. Secondary Impacts	37
	C. Voluntary Regulations	37
VI.	UNAVOIDABLE ADVERSE IMPACTS	
	A. Noise and Visual Intrusion	39
	B. Secondary User Impacts	39

	<u>Page</u>
VII. ALTERNATIVES	
A. Unrestricted Landings	40
B. Restricted Landings	40
C. Relocation of Landing Pads	42
D. No Landings	43
VIII. THE RELATIONSHIP BETWEEN SHORT-TERM USES AND LONG-TERM PRODUCTIVITY	44
IX. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES	45
X. REQUIRED APPROVALS	46
XI. SUMMARY OF UNRESOLVED ISSUES	47
References and Personal Contacts	51
 <u>Figures</u>	
1. Location Map	5
2. Hanakapiai and Hanakoa	66
3. Kalalau and Honopu	7
4. Kokee	9
5. Nualolo Aina, Nualolo Kai and Milolii	10
6. Polihale	11
7. Passengers Carried on Sightseeing Tours	24
8. Passengers Dropped off and Picked Up, By Month	25
9. Passengers Dropped Off and Picked Up, By Valley	27
10. Kalalau Beach Helipads and Noise Contours	30
11. Noise Readings From Helicopter Pass-Bys	31
 <u>Appendices</u>	
A. Parties Consulted for the Preparation of the EIS	A-1
B. Comments and Responses to the EIS	B-1

CHAPTER I. DESCRIPTION OF THE PROPOSED ACTION

A. INTRODUCTION

This Environmental Impact Statement for helicopter landings on the Na Pali Coast is a joint submittal by two firms currently operating helicopters on Kauai: Papillon Helicopters, Ltd. and Kenai Air Hawaii, Inc. Since the Na Pali Coast of Kauai is part of the Conservation District, commercial helicopter landings in the area require the filing of a Conservation District Use Application (CDUA) with the State Department of Land and Natural Resources (DLNR). CDUA's were filed separately by the two companies that are jointly submitting this EIS. (The helicopter flights themselves do not require DLNR approval).

After reviewing environmental assessments, the DLNR determined the need for an EIS from the two applicants, and authorized their joint submittal. Helicopter landings have been made by both firms on a regular basis in the past, and are continuing under temporary variance from the DLNR. Hence, the proposed action covered by this EIS is "after-the-fact"; data on past helicopter operations will be presented in this document.

A third company, Jack Harter Helicopters, also conducts helicopter tours of the Na Pali Coast. This EIS does not cover the activities of this company, although a brief description of its operations will be given, in order to evaluate cumulative impacts.

B. HELICOPTER OPERATIONS

Papillon Helicopters and Kenai Air Hawaii both offer scenic tours and provide transportation to the Na Pali Coast for picnickers and campers. Each company has three Bell Ranger turbine-powered helicopters (two each with a four-passenger capacity and one each with a six-passenger capacity). Papillon is based at the Princeville airport, while Kenai flies out of the Lihue airport.

Because they are closer to the Na Pali Coast, much of Papillon's business is in that area. Roughly one-third of their flights involve

drop offs or pick ups on the Coast (\$30 one-way); the remainder is made up of a variety of scenic tours. The majority of Kenai's business involves scenic tours, particularly the shorter tours to Mt. Waialeale and Waimea Canyon; less than 5% of their business is based on shuttle service to the Na Pali Coast. Both companies offer "round-the-island" tours and "all day adventure" tours that include stops on the Na Pali Coast. These stops give the passengers an opportunity to stretch and usually take 10 minutes or less. The helicopter is kept running during this time on the ground. The ridge above Nualolo Aina Valley is often used for these stops, depending on weather conditions (Figure 5).

Both companies land on the Na Pali Coast for the purpose of dropping off or picking up day-users or campers. The majority of this activity takes place at Kalalau, Honopu and Milolii Beaches, though a few people are brought to Nualolo Kai. Helicopters bring in a total of approximately 4,000 people per year. Interestingly, a significantly greater number of people (67%) are brought out of Kalalau Beach than are brought in by helicopter. Apparently, there are 600-700 people each year who get discouraged by the difficult Kalalau Trail, and decide not to hike back. Chapter IV presents additional data on the number of people brought to the Na Pali Coast by helicopter.

In addition to these commercial activities, the helicopter companies provide important public services, such as medical evacuations, rescues and trash pick up, often at their own expense. Papillon's helicopters are frequently chartered by the Division of State Parks for transportation of personnel and materials for maintenance work. Archaeologists and biologists also use the helicopters for access to their research sites.

C. REQUESTED LANDING SITES

The primary requirements of a helicopter landing site are a level area at least 65 feet in diameter that is free from trees, shrubs and other obstructions, and a clear approach/departure path. There are many sites along the Na Pali Coast that meet these requirements without the need for clearing or leveling the ground, and these have been occasionally used as the need arises (e.g. maintenance and rescue

operations, transporting research teams or brief scenic stops). Examples of this type of potential landing area are the beaches (Hanakapiai, Kalalau, Honopu, Nualolo Kai, Milolii and Polihale), the valleys with level, grassy floors (Honopu, Awaawapuhi and Nualolo Aina) and level shoulders on the exposed ridges. Other landing sites have been constructed by personnel of the DLNR (Divisions of Forestry and State Parks) to facilitate the transport of equipment and work crews to the trail shelters (eg Hanakoa Valley and Kalalau Beach). Some landing sites on the Na Pali Coast have been licensed by the State Department of Transportation as "quasi-public airports". The sites currently holding this designation are Kalalau Beach, Milolii Beach, Polihale Beach and Kokee State Park; these licenses are valid until July 1979. Sites that have previously been designated as heliports, but are presently closed to public use, are Honopu Beach, Nualolo Aina Valley and Nualolo Kai Beach.

As the proposed project, Papillon Helicopters and Kenai Air Hawaii are requesting permission for commercial helicopter landings at Kalalau Beach, Honopu Beach, Nualolo Kai Beach, Milolii Beach, Polihale Beach and Kokee State Park. In addition, permission is requested for brief stops at an inaccessible site on Nualolo Aina Ridge (Alapii Point) for use on the round-island scenic tours. The Hanakapiai and Hanakoa sites (Figure 2) would continue to be used for periodic State business, such as trail maintenance and removing trash. Emergency landings (evacuations and rescues) would be made wherever needed.

The locations of these sites are shown on Figures 2 through 6; solid dots indicate currently licensed helipads, while open circles identify other landing sites. The requested landing sites are described below:

Kalalau Beach. The official helipad, constructed by the State, was located close to the maintenance shelter for the convenience of the work crews. As a result, it was too close to the major camping and beach use area. It has recently been moved to a clearing in the low shrubs behind the beach, approximately 1,000 feet to the east of the former pad. The shoreline in this area is usually rocky and there is less camping activity (Figures 3 and 10).

Honopu Beach. Both the east and west beaches can accommodate a helicopter (Figure 3). Landings are typically made on a level area above the east beach, or on the beach near the water, depending on the distribution of campers and beach users.

SUMMARY OF POTENTIAL LANDING SITES

	Kalalau Beach	Honopu Beach	Awaawapuhi Valley	Nualolo Aina Valley	Nualolo Kai Beach	Milolii Beach	Polihale Beach	Kokee Lodge
Road Access							X	X
Trail Access	X						X	X
Boat Access	X	X			X	X	X	
Valley Accessible from Beach	X	*		*		X	X	
Licensed Helipad	X					X	X	X
Sanitation Facilities	X				X	X	X	X
Trash Containers	X				X	X	X	X
Water Supply (Developed, Stream, None)	S	S	S	S	N	D	D	D
Div. of State Park Jurisdiction	X				X	X	X	X
Div. of Forestry Jurisdiction		X	X	X				
Archaeological Sites	X	X	X	X	X	X	X	

(* Difficult and Hazardous Access from Beach)

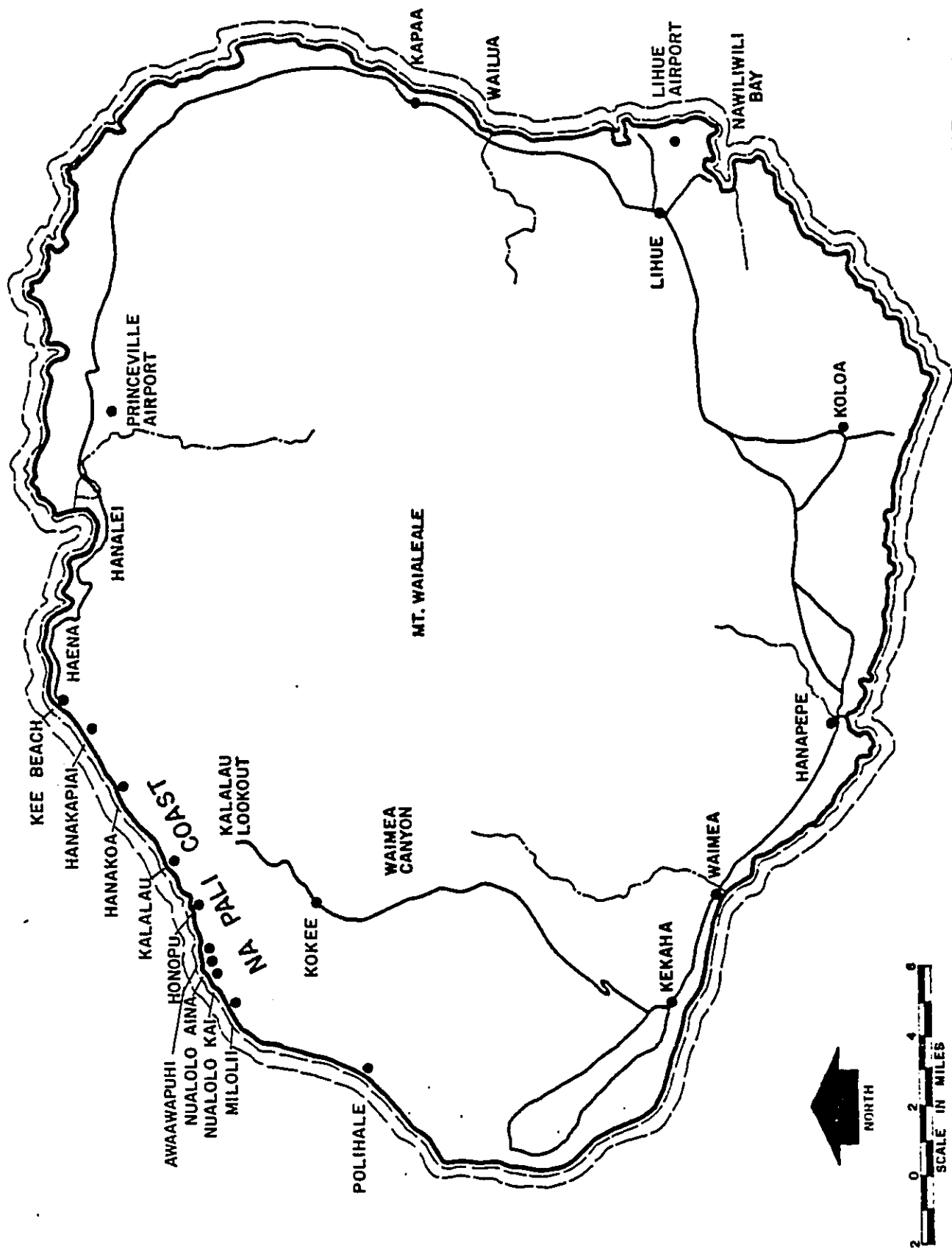
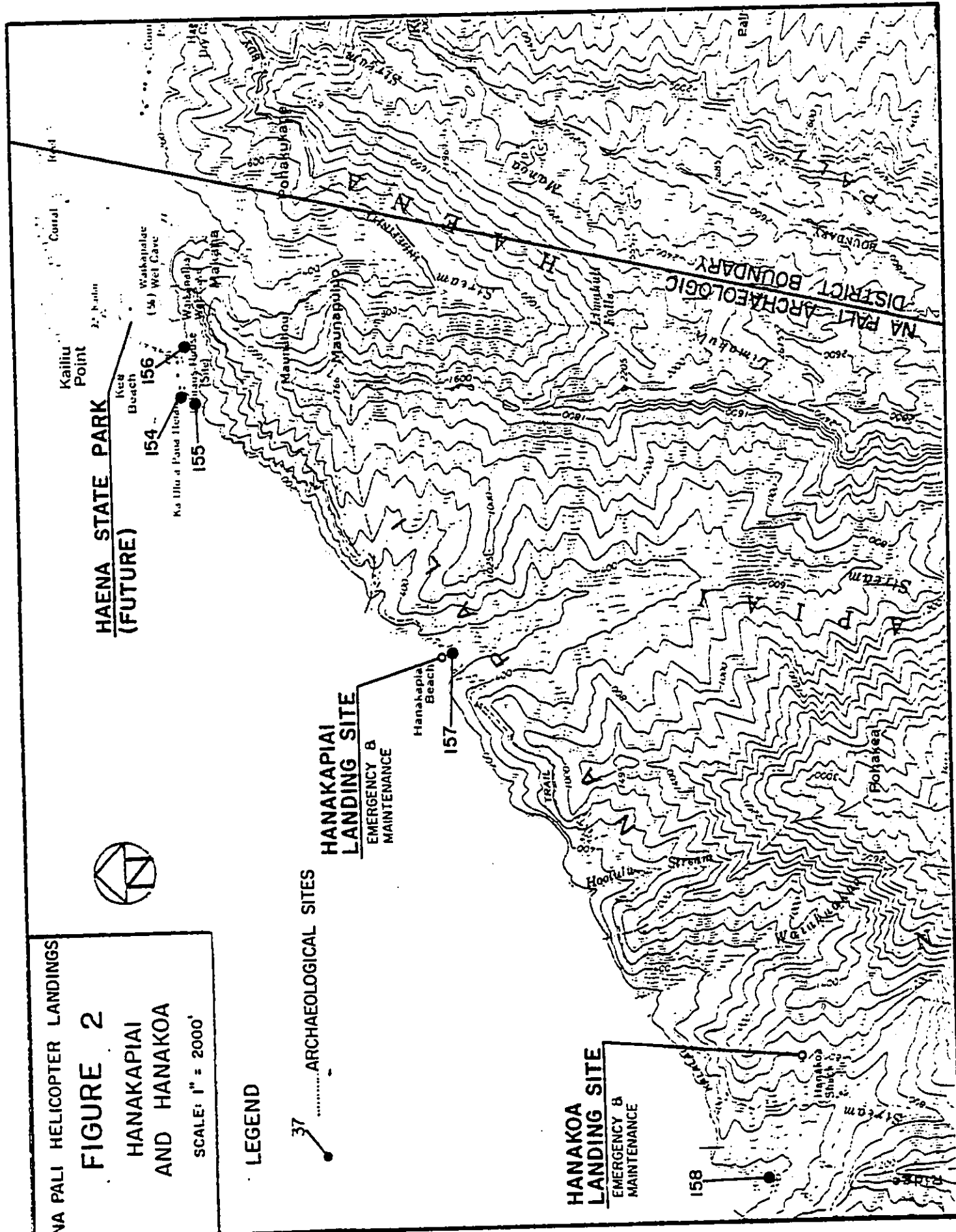


FIGURE 1
LOCATION MAP

ISLAND OF KAUAI



NA PALI HELICOPTER LANDINGS
FIGURE 2
 HANAKAPIAI
 AND HANAKOIA
 SCALE: 1" = 2000'

LEGEND

37 ARCHAEOLOGICAL SITES

NA PALI HELICOPTER LANDINGS
FIGURE 3
 KALALAU
 AND HONOPU
 SCALE: 1" = 2000'

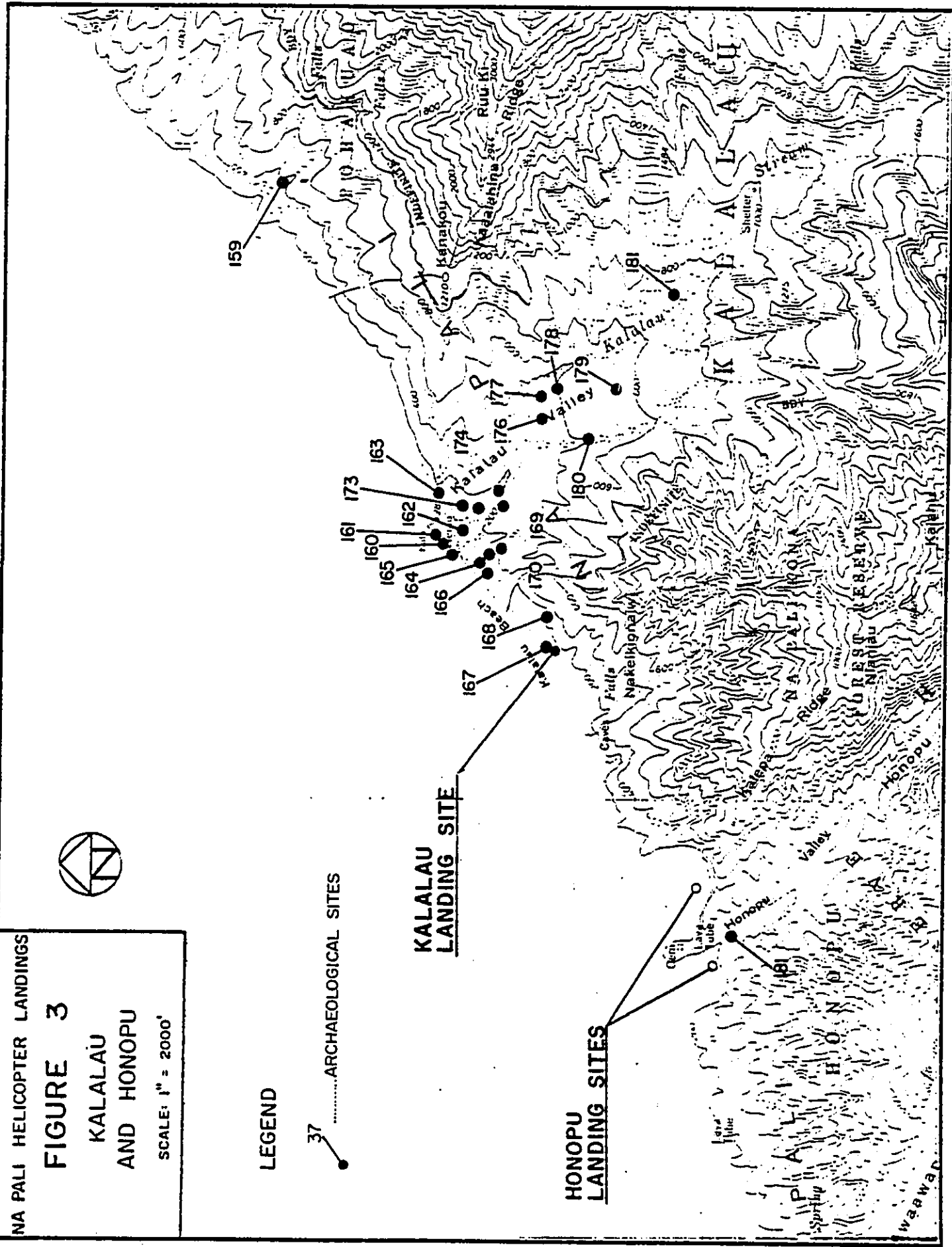


LEGEND

37ARCHAEOLOGICAL SITES

**KALALAU
 LANDING SITE**

**HONOPU
 LANDING SITES**



Kokee Lodge. The Kokee helipad is located at the site of Kokee Lodge, between the Na Pali Coast and Waimea Canyon (Figure 4). The site is reached by State Highway 55, and has a parking lot, restaurant, and other facilities. The official helipad is located at least 200 feet from any structures or other obstructions. The primary use of this site is on the scenic tours.

Nualolo Aina. Two sites are requested in this valley, one near the valley floor approximately 1,500 feet from the shore, and the other on the scenic ridge (Alapii Point) between the valley and Nualolo Kai (Figure 5). These sites are only accessible by helicopter or through a difficult climb from the beach, and have no facilities. They are intended as scenic stops only (though drop offs have been made in the valley).

Nualolo Kai Beach. Nualolo Kai State Park is a pocket beach surrounded by sheer cliffs. The proposed helipad is between the Koa-haole brush at the base of the cliffs and the open sandy beach, approximately 100 yards from the shelter (Figure 5).

Milolii Beach. Milolii State Park is another small packet beach with no land access. It has more facilities than the other beaches, including a small cabin used by Park personnel, three open shelters, three pit privies and a 5,000 gallon water tank supplied by Milolii Stream. The recently-defined helipad is on a level clearing approximately 15 feet above sea level and 100 yards east of the shelters (Figure 5).

Polihale Beach. Polihale State Park is located at the end of the highway beyond Barking Sands. Facilities include two main pavilions, and a number of small shelters for camping and picnicking. Showers, restrooms and emergency telephones are also provided. The State has constructed a heliport at the southwest end of the park, approximately 300 yards from the shore (Figure 6).

Both helicopter firms are willing to work with the DLNR to establish operational controls for helicopter landings on the Na Pali Coast. Parameters that can be adjusted to minimize impacts include the number and frequency of landings, hours of operation, length of time on the ground and the approach and departure paths. These considerations are discussed more fully in Chapter V. Mitigation Measures.

NA PALI HELICOPTER LANDINGS

FIGURE 6

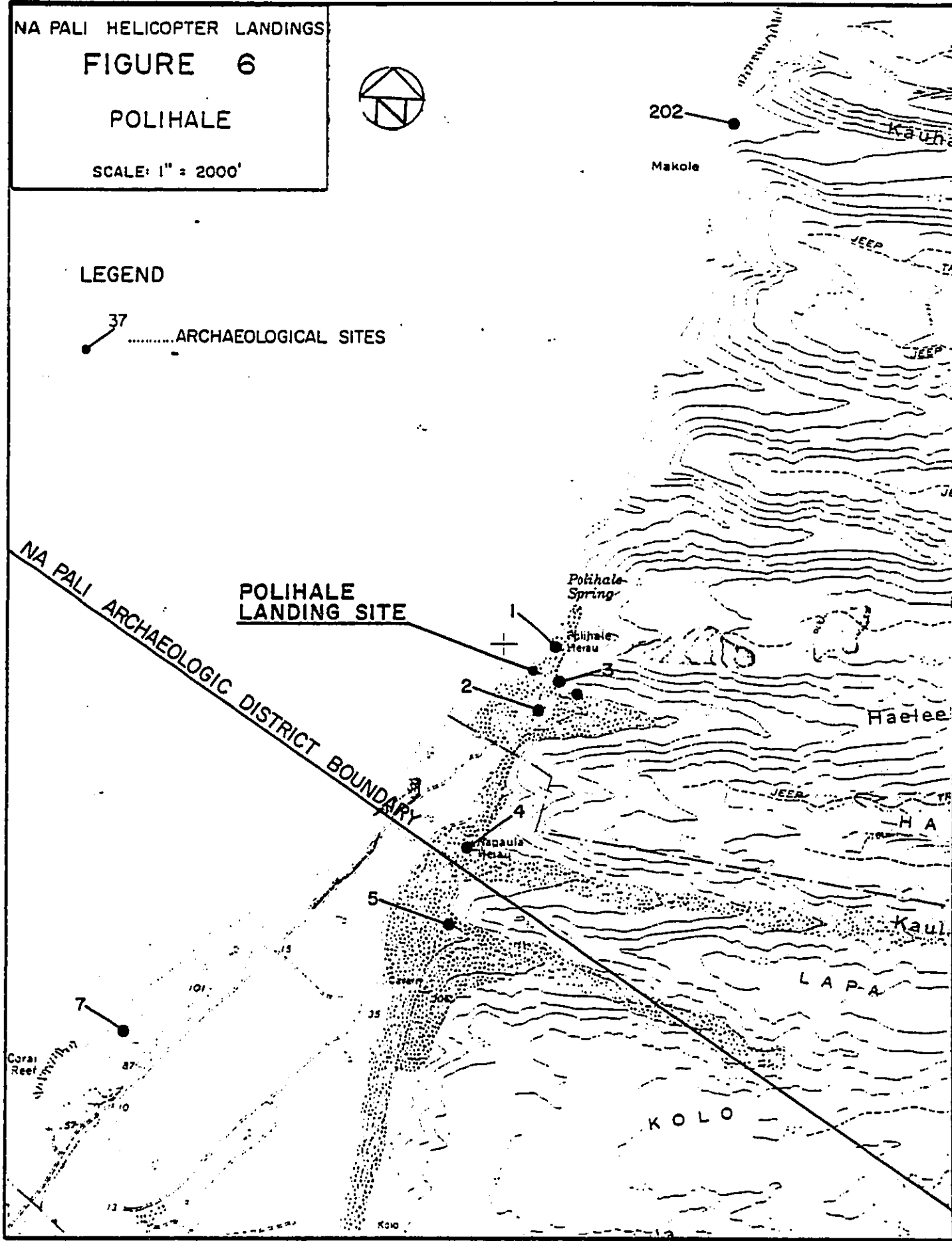
POLIHALE

SCALE: 1" = 2000'



LEGEND

37 ARCHAEOLOGICAL SITES



D. OTHER ACTIONS OF A SIMILAR NATURE

There is one other helicopter company, Jack Harter Helicopters, operating on Kauai. This company provides scenic tours only and does not drop off picnickers or campers on the Na Pali Coast. However, the round-island tour does provide a brief rest stop on the Na Pali Coast, usually at Nualolo Aina Valley. A maximum of four flights daily are scheduled, but the average is less. The average cruising altitude over the coast is 1,500 feet above sea level.

There is presently one commercial boat operation, Na Pali Zodiac, landing passengers on the Na Pali Coast. Several other firms have filed CDUA's, but permission to land has not been granted. Na Pali Zodiac has been authorized to make two landings per day at Kalalau Beach only. The rubber boats used have a 6-passenger capacity, so the operation can theoretically land 12 people per day. However, poor weather and other factors limits the average to around 60 - 70 per week.

CHAPTER 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. GENERAL CHARACTERISTICS

The Na Pali Coast consists of the rugged section of Kauai from Kee Beach at the end of the road beyond Haena, to Polihale Beach at the end of the road beyond Barking Sands (Figure 1). This section of coastline is approximately 15 miles in length and is characterized by precipitous cliffs, deep valleys and isolated beaches. There are twelve major valleys between Kee Beach and Polihale Beach; Hanakapiai, Hanakoa, Kalalau, Honopu, Awaawapuhi, Nualolo Aina (sometimes referred to as "the valley of the lost tribes"), Milolii, Makaha, Kauhao, Kaaweiki, Hikimoe and Haeleele (Figures 2-6). This EIS deals primarily with the portion of the coast from Hanakapiai Valley to Milolii Valley.

There are five relatively permanent beaches on the Na Pali Coast, though much of the sand washes out during the winter and is not always fully replaced in the summer. These beaches are located at the mouths of Hanakapiai Valley and Honopu Valley, to the west of Kalalau Valley, to the west of Nualolo Aina Valley (Nualolo Kai Beach) and to the east of Milolii Valley. A small beach occasionally forms at the mouth of Awaawapuhi Valley. The majority of the Na Pali coastline rises vertically out of the water, resulting in "hanging valleys" with waterfalls cascading into the ocean. Only Hanakapiai, Kalalau, Milolii and Haeleele Valleys can be easily reached from the ocean; cliffs must be scaled to enter the others (except for Hanakoa, which is on the Kalalau Trail).

B. ACCESS

Access to the Na Pali Coast is by trail, boat or helicopter. Portions may be viewed from the road ends at Kee Beach, Polihale Beach, Kokee (Kalalau lookout) and Milolii Road (jeep trail) as well as from the ends of Nualolo, Awaawapuhi and Honopu Trails. The Kalalau Trail extends from Kee Beach to Kalalau Beach, providing access to Hanakapiai, Hanakoa and Kalalau Valleys. Hanakapiai Beach is only two miles from the trail head and therefore receives the highest level of day use. Hanakoa Valley is approximately six miles from the road and is primarily used as an overnight stop by campers destined for Kalalau Beach, which is at the end of the trail, eleven miles from Kee Beach. Under certain circumstances (large fill of sand, low tide and calm surf), Honopu Beach may be reached by wading or swimming from Kalalau Beach, but this can be very dangerous. The early Hawaiians who occupied the valleys constructed trails across some of the cliffs, but these have long since been destroyed by landslides. A number of trails lead down ridges from the top of the pali (Honopu, Awaawapuhi, Nualolo, Milolii, Kauhao, Kaaweiki, Polihale and Haeleele Trails), but do not reach the coast due to the steep cliffs. These trails are not regularly maintained. Most of the Na Pali Coast is too rugged to construct, for a reasonable cost, a trail that would be "safe" by present standards (although one has been proposed between Kilohana and Hanakapiai). As a result, almost half of the Na Pali Coast is inaccessible by land.

Boat landings can be made on any of the beaches, but there must be ample sand and calm surf. The State has blasted and marked small boat channels through the reefs fronting Nualolo Kai and Milolii Beaches. This facilitates landings in rougher seas than is possible at the other beaches. There is presently one commercial operator with a permit from the DLNR to land picnickers and campers at Kalalau Beach, though there have been more operators in the past (prior to the State requiring Conservation District Use Applications), and there have been recent allegations of unauthorized commercial operations in the area. Private boat owners primarily use Nualolo Kai and Milolii Beaches.

As previously noted (Chapter I), helicopters are capable of landing at many spots along the Na Pali Coast. However, the majority of the landings take place at Kalalau, Honopu and Milolii Beaches. A high, level area on the ridge at the mouth of Nualolo Aina Valley is a popular stopping point on scenic tours, but passengers are not dropped off or picked up there.

C. USE PATTERNS

The Na Pali Coast is used primarily as a recreation area, and its use for this purpose has been increasing as a result of recent publicity. Basic recreational pursuits include enjoying the exceptional scenic beauty, picnicking, sunbathing, swimming, camping and hunting. Other uses include archaeological and biological research.

The scenic resources of the Na Pali Coast can be experienced from the Kalalau Trail, from boats and from helicopters. Each mode of transport offers a totally different perspective. The views unfold more slowly from the trail, and small details can be enjoyed. The physical exertion that the trail demands can have a positive effect, depending on one's condition and attitude. The boats provide a much wider field of view, since they are farther away from the land. The waterfalls of several valleys can often be seen at one time, and boats are slow enough for the view to be studied. Boats also allow a close approach to the sea caves, and if conditions are favorable, several can be entered. The visual experience from a helicopter can best be described as "high energy", due to the speed (up to 100 mph) and the shifting frame of reference. The time spent with each view element is relatively brief, but there is a succession of close and distant views from a perspective that can not be obtained from the ground or water.

In general, two categories of visitor use of the Na Pali Coast can be distinguished: day use and overnight camping. The latter category is controlled by the Division of State Parks through the requirement of camping permits, which allow for a maximum stay of seven days. A general description of these two categories of use follows; data for the helicopter passenger contributions to the use of the Na Pali Coast and its seasonal variation is presented in Chapter IV.

1. Day Use. Day uses of the Na Pali Coast include hiking, picnicking and sun bathing. Day users enter the Na Pali Coast by foot, boat and helicopter.

Hikers enter the area through the Kalalau Trail, which begins at Kee Beach. Hanakapai, a two mile hike from the trail head, is the most popular destination point for day hikers. Hanakoa, located 5 miles from the trail head is only rarely used by day hikers. Kalalau, at 11 miles, is too distant for day hiking and all points west are inaccessible on foot. Day users who travel by helicopter or boat have much greater opportunities than hikers as all of the Na Pali Coast is available to them. Helicopters do not usually transport day users to these areas.

Motorized transportation allows day users the opportunity to explore the more distant valleys and beaches of the Na Pali Coast, who would otherwise be limited to Hanakapiai and Hanakoa. The relatively high cost of boat and helicopter travel when compared to the cost of hiking into the area indicates that the typical helicopter passenger is probably more affluent than the typical hiker. Data on the socioeconomic profiles of the two groups is, unfortunately, not available.

It is difficult to accurately determine the origin and characteristics of the different recreational users of the Na Pali Coast. Although helicopters are used by Kauai residents, the majority of passengers are out of state residents on short visits to Kauai. On the other hand, the beaches at Nualolo Kai and Milolii are often used for picnics by local families arriving by private boats.

2. Camping. No cabins are available in the Na Pali Coast, so overnight visitors must come supplied with camping equipment. The great majority of campers hike in; only 11% of the camper visitor days are at Kalalau contributed by helicopter passengers (See Chapter IV), while the percentage of campers entering by boat is not known.

Maximum stay allowed for campers is 7 days, although most people stay for considerably shorter periods of time. Most campers stay near the beaches; the level of usage decreases in the mauka sections of the valleys.

D. WATER RESOURCES AND HAZARDS

The USGS maps show twenty-two streams between Kee Beach and Polihale Beach, twelve of which are perennial. The perennial streams, in order, are; Hanakapiai, Hoolulu, Waiahuakua, Hanakoa, two unnamed streams, Kalalau, one unnamed stream, Honopu, Awaawapuhi, Nualolo Aina and Milolii. The valleys between Milolii and Polihale do not support continuous flows. The discharge of the perennial streams is highly variable, and they are subject to flash flooding; drownings have occurred when campers have attempted to cross them.

The water quality of many of the streams is very poor by public health standards; as a result, all of the streams crossed by the Kalalau Trail are posted, cautioning that the water should be boiled before drinking. This is also true of the water supply to the camping areas at Kalalau (an unnamed stream) and Milolii (piped in from Milolii Stream and stored in a 5,000 gallon water tank). There is no permanent water supply at Nualolo Kai Beach. The major sources of stream contamination are improper disposal of human wastes and the population of feral goats. Other unsanitary practices, such as dressing-out goats and leaving the offal in a stream, have been observed (E. Evans, pers. com.). The lack of a potable water supply is a major limiting factor to the safe enjoyment of the Na Pali Coast.

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 talus at the base of the cliff as an escape area, while Hanakapiai Valley and the wide portion of Kalalau Beach allow escape beyond the inundation zone.

E. BIOLOGICAL RESOURCES

The rainfall received on the Na Pali Coast decreases from Kee toward Polihale, and increases from low elevations to high elevations. As a result, the vegetation is dense forest in Hanakapiai and Hanakoa Valleys, being dominated by ohia (Metrosideros collina), koa (Acacia koa), hala (Pandanus spp.), kukui (Alurites moluccana), guava (Psidium guajava), mango (Mangifera indica), Java-plum (Eugenia cumini) and other trees. These species (with a greater dominance by the natives) also characterize the higher elevation rainforests. The floor of Kalalau Valley supports a dense secondary growth of shrubs, primarily koa-haole (Leucaena latisiliqua), lantana (Lantana camara) and kiawe (Prosopis pallida); the upper reaches are forested. Honopu, Awaawapuhi and Nualolo Valleys are predominantly grassy, with thickets of shrubs (guava) along the streams.

The floor of Milolii Valley is dominated by koa-haole. The vegetation found behind the beaches is a combination of native and introduced plants common to coastal habitats. Naupaka (Scaevola taccada) and naio (Myoporum sandwicense) are the dominant natives. At Hanakapiai, the forest vegetation extends to the beach area, but at the other beaches, there are thickets of koa-haole, guava and kiawe (Prosopis pallida). At Kalalau, Nualolo Kai and Milolii Beaches there are patches of bermuda grass (Cynodon dactylon) and other introduced grasses stabilizing level areas.

Past land uses and grazing by goats have significantly altered the natural vegetation of the valley floors and endangered a number of endemic plant species. Some of the plants found on the dry, precipitous cliffs are very rare, but most of these are relatively inaccessible. There are three rare and endangered plant species found at Nualolo Kai Beach; 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.). There are two rare and endangered plant species 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. Lamoureaux, pers. com.).

The wildlife found at lower elevations on the Na Pali Coast includes goats and introduced rodents and birds common to koa haole/guava thickets throughout the State. However, the forest at the top of the pali, especially the Alakai Swamp area, supports some of the last populations of certain rare and endangered birds. Seabirds, including white-tailed tropic birds, common noddys and black noddys nest on the cliffs, and migratory shorebirds (wandering tattler, sanderling, ruddy turnstone and golden plover) utilize the beaches. The rare Newell's shearwater nests at scattered locations in the high mountains from Hanalei to Waimea Canyon, but has not been sighted on the Na Pali Coast (J. Sincock, pers. com.) The endangered Koloa duck frequents the streams on the Na Pali Coast, and has been sighted on Milolii Stream (C. Lamoureux, pers. com.).

The streams of the Na Pali Coast are the most pristine on the island. They support a full compliment of native fish; (Lentipes concolor, Sicydium stimpsoni, Awaous stamineus, Awaous genivittatus and Eleotris sandwicensis). The streams also support native shrimp (Atya bisulcata) and hihiwai (Neritina granosa). The Lentipes, which has been proposed for inclusion on the Federal endangered species list, is one of the most prevalent fish in the Na Pali Streams. (C. Courep and J. Maciolek, 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 Kalaeua 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 up on the beach, one was observed in April of 1978 within a few feet from shore at Milolii (see letter from David Boyton, page B-26). There are records from the 1920's of nesting activities on Milolii Beach (G. Balazs, pers. com.).

F. HISTORY AND ARCHAEOLOGY

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. Hanakapiai, Hanakoa and Kalalau Valleys were farmed well into this century, and were used for cattle grazing until quite recently. Kalalau Valley still has the remains of a small mill that was used to process the coffee grown there.

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. There are numerous sites in Kalalau Valley.

Figures 2-6 show the location of known archaeological sites in the vicinity of landing spots in the Na Pali Coast, as described in Archaeology of Kauai, by Wendell Clark Bennett, Bishop Museum, 1931, Bulletin 80.

Specific archaeological sites located within 1,000 feet of proposed landing spots are listed below:

Kalalau

Site 167 - Taro bed

Site 168 - Grass shelter and house sites

Honopu

Site 182 - Taro tenaces and house sites

Nualolo Aina

Site 190 - House sites

Site 191 - House site

Site 192 - House site and taro tenaces

Site 194 - Taro tenaces

Site 195 - Trail and rope ladder fastened to rings cut into rock,
Hand holds.

- Site 196 - Eight terraced house sites
Site 197 - House site and walls
Site 198 - Burial caves
Site 199 - Heiau at base of talus slope

Nualolo Kai

- Site 200 - House sites

Milolii

- Site 201 - Structures in Milolii Valley - Terracing with some 8-foot facings and stone platform heiau.

Polihale

- Site 1 - Polihale heiau, a four-terraced structure on the seashore at the base of Polihale Cliff.
Site 2 - House sites
Site 3 - House site, in a niche in the cliff.

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

The entire Na Pali Coast and inland areas that extend as much as eight miles from the shoreline are owned by the State and managed by three Divisions of the Department of Land and Natural Resources: State Parks, Forestry and Fish and Game. Consolidation under the Division of State Parks has been proposed, with cooperative management of forest resources and hunting.

Portions of the Na Pali area (Kalalau, Nualolo Kai and Milolii) comprise the Na Pali State Park, managed by the Division of State Parks. The rest of the area is under the Division of Forestry and is known as the Na Pali State Forest Management Area (SFMA). This SFMA is classified as a "wildland" area, defined as a scenic and wild area where past abuse has destroyed the overall native flora cover. The Division of Fish and Game controls hunting in the area. Goats are the only game species hunted in the Na Pali Valleys.

A draft "Haena-Na Pali Coast Recreation Plan" is currently being reviewed within the Department of Land and Natural Resources. The two goals of this plan are:

- (1) To preserve and protect the identified natural and historic resources within the park.
- (2) To make the parks available for the safe use and enjoyment by the public.

The plan recognizes that in order to achieve these goals there is a need to control the number of visitors to the area, 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:

- (1) Monitor the landing 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.

- (2) 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 flight logs.

The Forestry Division has made the following program proposals for the Na Pali areas under its jurisdiction:

- (1) Expansion of the trail system and construction of a shelter in the Honopu-Milolii Upland Unit;
- (2) Construction of a foot trail in Nualolo Aina Valley;
- (3) Construction of a trail to join the Kokee area to the Na Pali Coast from Kilohana to Hanakapiai Valley.

A portion of the Na Pali Coast from Haena to Hanakou Valley has been nominated for inclusion into the Natural Area Reserves System. The objective of this system is to preserve, in as natural condition as practicable, and in perpetuity, those land and/or water areas which:

- (1) Form representative units of ecosystems containing the diversity of terrestrial or aquatic biota of the islands;
- (2) Have unique geologic or physiographic significance, or;
- (3) Are necessary for preserving endangered species of Hawaiian fauna or flora. (Hawai'i Natural Area Reserves System, Regulation No. 14).

The requested helicopter landings are in conformance with the goal of making the Na Pali State Park available for use. Without commercial helicopter or boat access, much of the park could not be reached by the average citizen. Due to frequently hazardous sea conditions, boats are often unable to land, making the helicopter a more reliable means of access.

The helicopter landings do, however, detract from the "wilderness experience" of the Na Pali Coast as enjoyed by some visitors. As a result, voluntary regulations have been proposed by the helicopter operators (see Chapter V).

CHAPTER IV. IMPACTS OF THE PROPOSED ACTION

A. PRIMARY IMPACTS

Three broad areas of primary impacts can be identified as a result of the proposed action. Helicopters make the Na Pali Coast easily accessible to significant numbers of people. As an inevitable by-product of their operation, helicopters generate noise and visual intrusions on the wildland environment. On the other hand, helicopter operations can be beneficial in the areas of recreation, safety (rescues, etc.) and public service (transportation of State personnel, etc.). Other impacts can be considered secondary, in the sense that they are the result of these primary impacts, not necessarily because of their relative importance.

1. Passenger Statistics. Figure 7 shows the monthly total of passengers carried by both firms on sightseeing tours of the Na Pali Coast during the period August 1, 1977 to July 31, 1978. In general, more people take the sightseeing tours during the winter, a pattern which matches the seasonal fluctuations of the visitor industry in Hawaii. The number of tour passengers for this 12 month period was 6,798 for Papillon Helicopters and 4,085 for Kenai Air Hawaii, making a total of 10,883. At an average occupancy of 5 passengers per helicopter, this corresponds to about 2,177 helicopter trips in a year, or about 6 trips per day.

In contrast with the number of sightseeing tour passengers, there were 3,845 passengers dropped off and 4,374 passengers picked up in the Na Pali Coast area by both companies during the August '77 - July '78 period. Figure 8 shows the monthly distribution of passenger drop offs and pick ups for both companies during this period. The numbers graphed in Figure 8 include day use and overnight campers, as well as scheduled and unscheduled pick ups. As can be seen in this figure, there are larger numbers of drop-offs and pick ups during the summer, probably a reflection of the better weather conditions that occur during the summer months.

The greater number of passengers picked up than dropped off is due to the fact that some hikers find the trail to Kalalau Valley to be more physically demanding than they had expected, and when given the opportunity, will opt to return to Hanalei by

FIGURE 7

NUMBER OF PASSENGERS CARRIED ON SIGHTSEEING
TOURS BY BOTH COMPANIES (8/1/77 - 7/31/78)
(NO DROPOFFS OR PICKUPS)

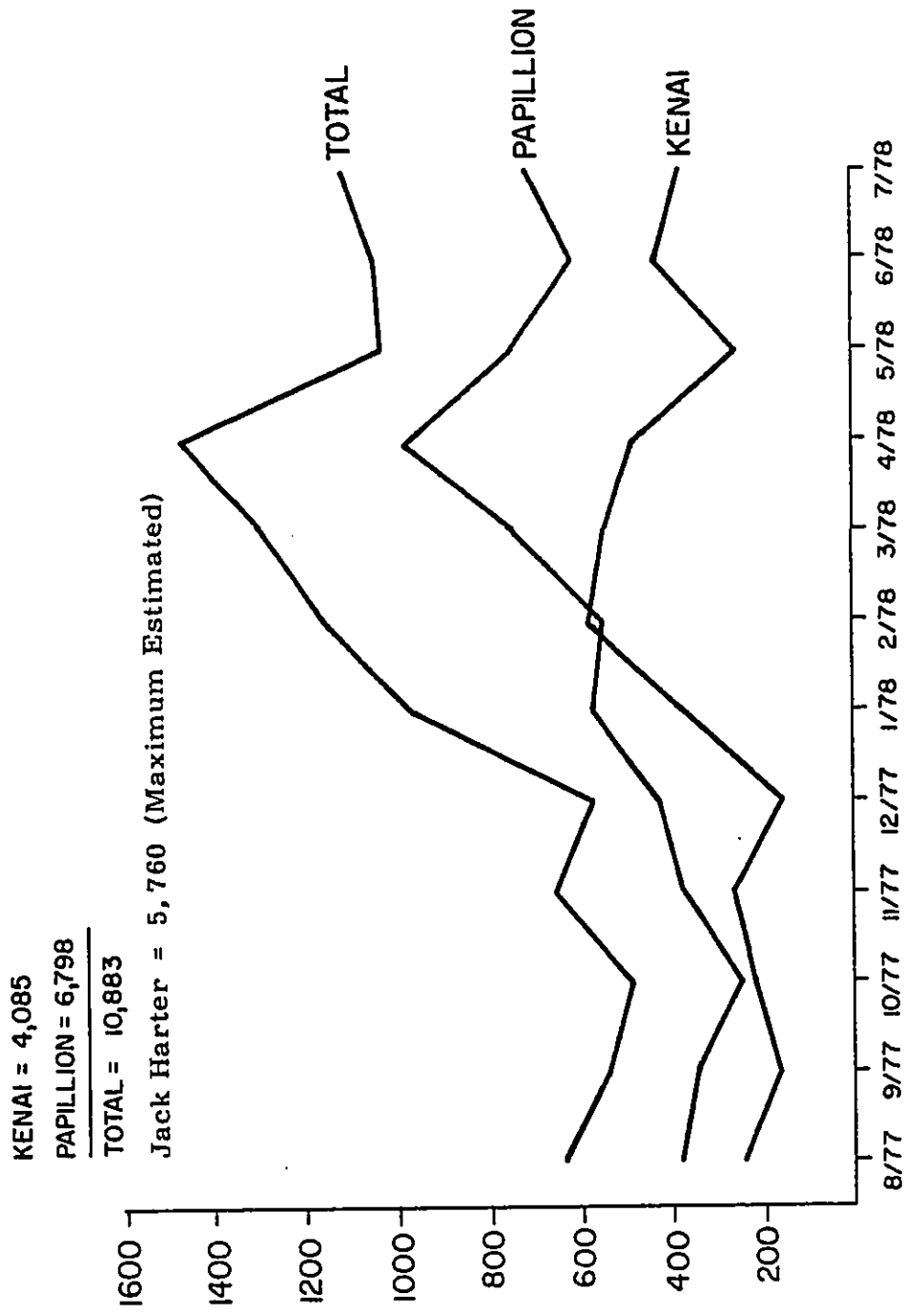
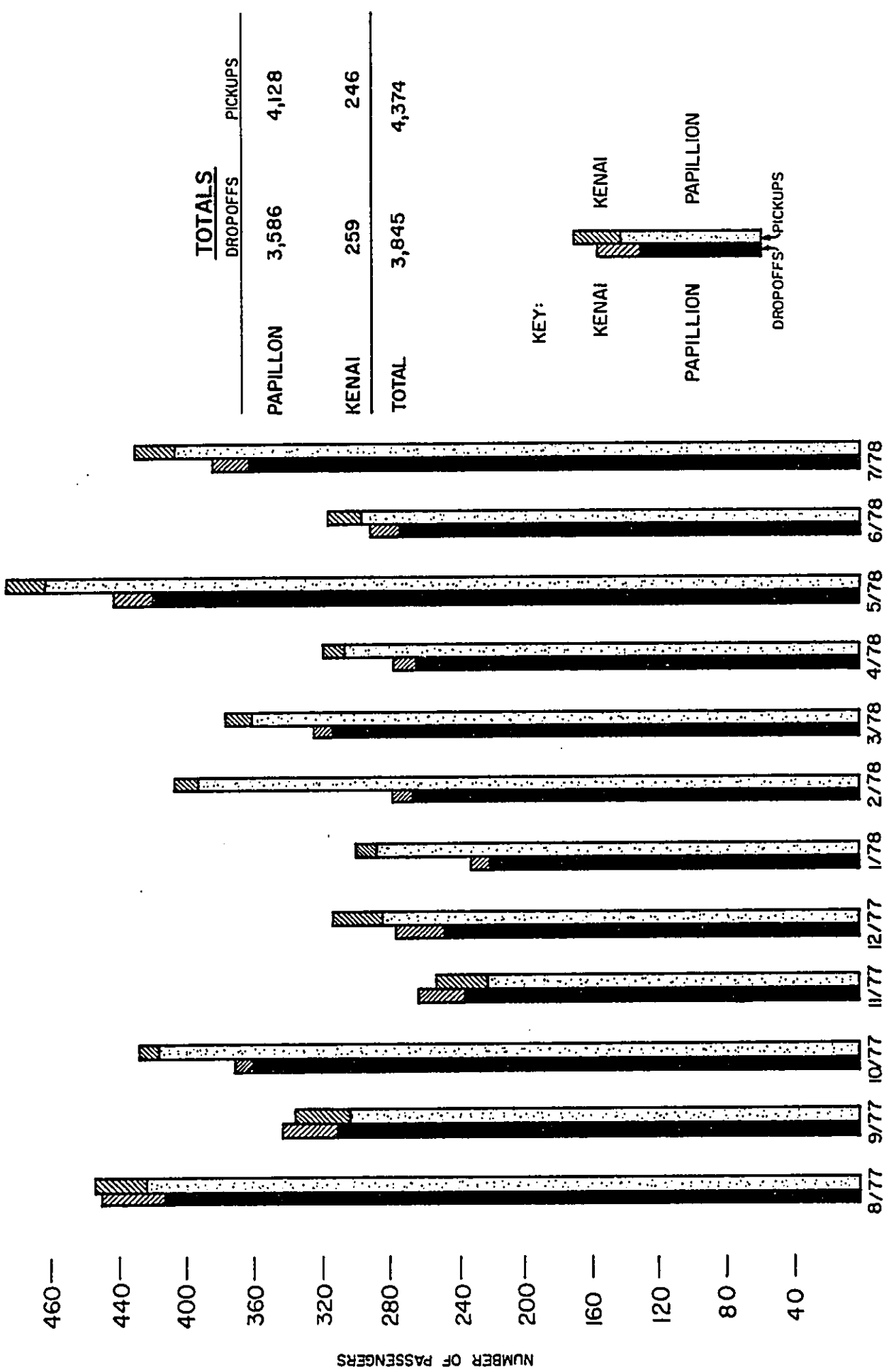


FIGURE 8
NUMBER OF PASSENGERS DROPPED OFF AND PICKED UP BY HELICOPTERS ON THE NA PALI COAST
 (8/1/77 - 7/31/78)



means of the helicopters. This point is illustrated in Figure 9, which shows the total number of passengers dropped off and picked up in different locations along the Na Pali Coast. It can be seen that drop offs and pick ups are roughly balanced in all locations except at Kalalau, where there are approximately 60% more passenger pickups than dropoffs.

In addition to Kalalau, the two other locations with the greatest numbers of passenger dropped off and picked up are Honopu and Milolii. Honopu is accessible only by a 1/4 mile swim from the end of Kalalau Beach. Milolii is inaccessible except by boat and helicopter (although it can be reached by hiking and swimming from Polihale). The number dropped off and picked up at the other locations is insignificant by comparison, most taking place at Nualolo Aina (under Division of Forestry authorization).

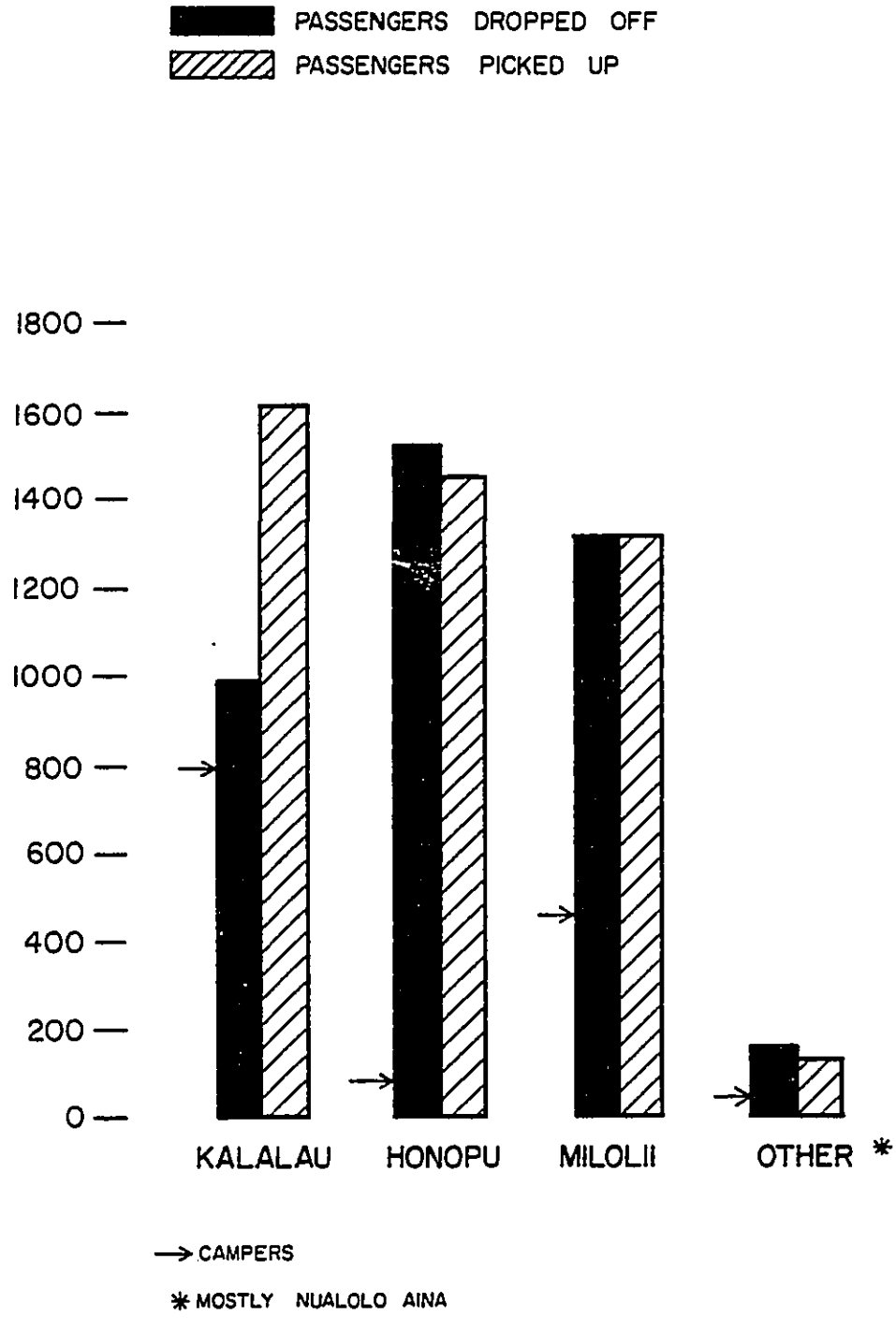
Most of the passengers that are dropped off by helicopter in the Na Pali Coast area do not stay overnight. Although the proportion varies at each destination (Figure 9), overall only 35% of the drop offs are of campers, with the majority staying at Kalalau. Assuming an average length of stay of 2.5 days (based on partial flight log records), the helicopters contributed to approximately 3,200 visitor days on the Na Pali Coast.*

The most recent statistics on visitor usage of the Na Pali area compiled by the State Parks Division, are for the period July 1, 1977 - June 30, 1978. Although these statistics do not cover exactly the same period as the helicopter passenger data presented here (August 1, 1977 - July 31, 1978), some meaningful comparisons between the two can be made. The State Parks Division data is derived from camping permit information, and might be an underestimate of the actual usage of the area, as presumably some campers in the Na Pali area could still be unaware of the permit requirement.

* Visitor Day is a measure of the overnight use of an area; one visitor day represents one person camping for one day. (Two persons camping 3 days is equal to 6 visitor days.)

FIGURE 9

NUMBER OF PASSENGERS DROPPED OFF
AND PICKED UP AT DIFFERENT VALLEYS
AUGUST 1, 1977 - JULY 31, 1978



Approximately 785 campers were dropped off at Kalalau; at 2.5 days each, 1,960 visitor days can be attributed to helicopter passengers. This is 11.5% of the 17,052 visitor days recorded by the Division of State Parks for July 1, 1977 - June 30, 1978. If the maximum stay of 7 days is assumed, the proportion rises to 32%.

By contrast, a total of 470 campers were dropped off at Milolii Beach during this period, amounting to approximately 1,175 visitor days. The State estimated 781 visitor days on the basis of camping permits.

In summary, the relative impact of visitor days contributed by helicopter passengers at Kalalau can be considered minor, as the great majority of visitors to the valley come in by trail. Helicopter passengers, however, constitute the bulk of campers at Milolii, a beach and valley area that is not accessible by trail. Presumably, the situation at Milolii is representative of the other areas of the Na Pali Coast (Honopu, Nualolo Kai and Nualolo Aina) that are not accessible by trail. Unfortunately, no complete data on camper usage of these areas is available, except that approximately 70 campers were brought to Honopu during the year.

There are a number of problems in comparing the helicopter passenger data with the State Parks data, since there are areas of uncertainty in each. It is difficult to obtain length of stay for helicopter-dropped campers, especially if they did not schedule a pick up. The State Parks data is underestimated by an unknown amount, since it is known that some people do not obtain permits. Furthermore, the State has no data on day use at the various beaches. One of the first needs for proper management is a simple, coordinated record-keeping system for all parties involved.

2. Noise Impacts. As previously mentioned, noise is one of the primary impacts of helicopter operations. In an effort to quantify the magnitude of the noise impact, field tests were conducted by personnel of VTN Pacific to determine the noise ranges at various distances from the helicopter, with the helicopter idling on the ground, taking off and landing, hovering above the observer and passing by at various altitudes. Readings were taken with a GR 1565-B, Type 2 meter using the "A" scale, which most closely resembles the response of the human ear to noise.

Figure 10 shows a plot of the noise readings (in dBA) vs. distance from the helicopter (a Papillon 6-passenger Bell Ranger) idling on the pad at Kalalau. Background levels were in the 59-63 dBA range. With the helicopter idling on the pad, readings were as high as 93 dBA under the rotor, and remained above 80 dBA for a distance 90 feet from the helicopter. Noise levels of 75dBA were recorded as far away a 150 feet and dropped to 71 dBA at 300 feet.

Readings were taken at Princeville Airport with the helicopter hovering at different altitudes above the observer. Noise levels decreased from 80 dBA with the helicopter 100 feet above the observer to 74 dBA at 500 feet above the observer.

Noise readings for several pass-by's at Hanakoa Valley are graphed in Figure 11. Pass-by #1 (Figure 11a) was made with the helicopter heading mauka on the normal route to the waterfall at an altitude of 1,000 feet, 500 feet above the observer located at the Hanakoa landing pad. Readings above the background level of 48 dBA were recorded for 67 seconds; a peak value of 64 dBA was noted. Noise elevation above background as recorded at the Hanakoa landing pad lasted only 45 seconds with another helicopter pass-by at 1,000 feet altitude over the shoreline (data not shown).

Noise data for another helicopter pass-by of Hanakoa Valley is shown in Figure 11b. This time the helicopter was flying over the ocean at 1,000 feet altitude near and parallel to the shoreline (pass-by #2) and the observer was located on the trail at 500 feet altitude, in a location more exposed to the ocean (see Figure 11 inset). The total noise elevation above background (45 dBA) lasted 90 seconds for this pass-by. Peak noise readings of 62 dBA were recorded for this pass-by.

FIGURE 10

SKETCH OF KALALAU BEACH SHOWING
HELIPADS AND NOISE CONTOURS FROM
HELICOPTER IDLING AND TAKING-OFF

SCALE: 1" = 400' (APPROX.)

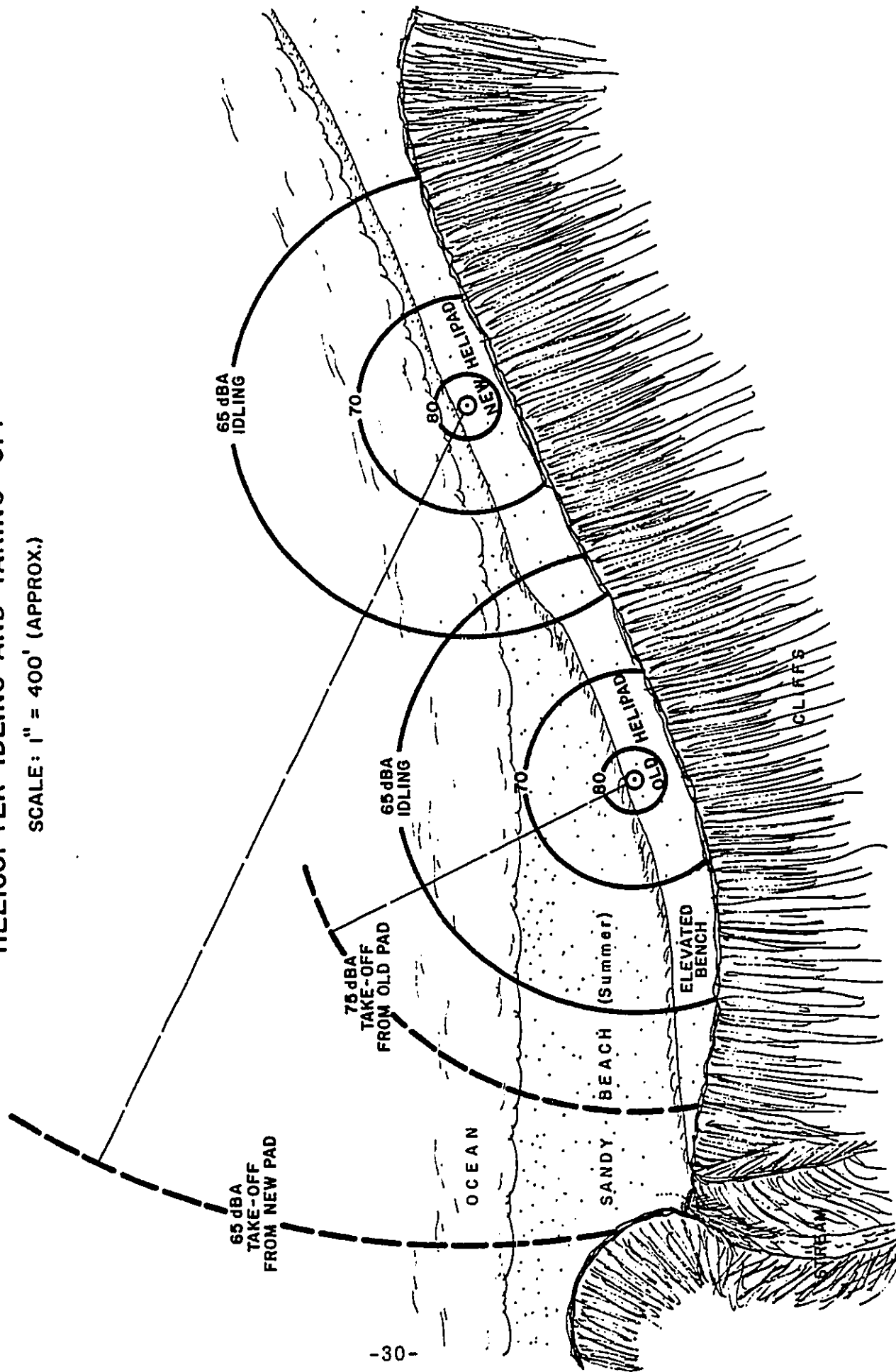
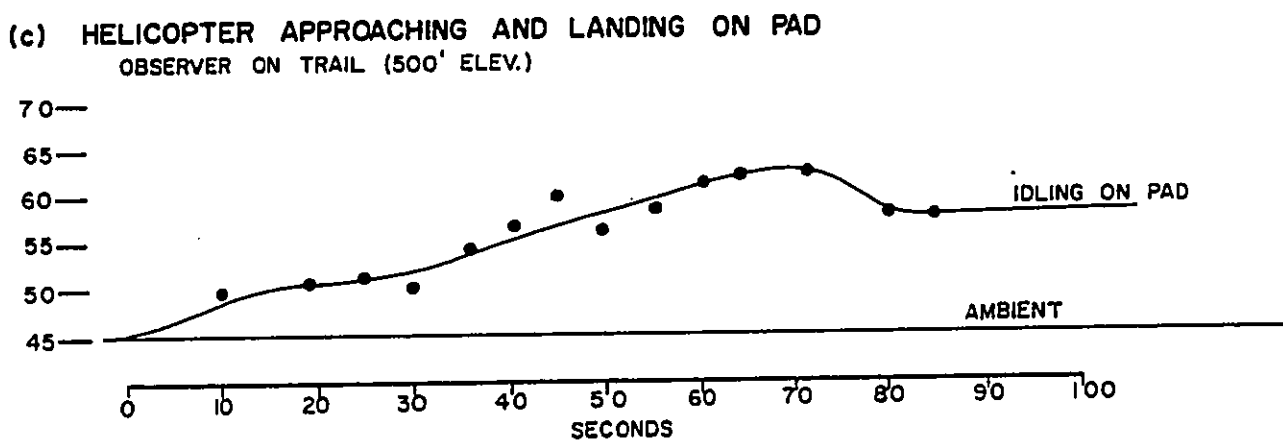
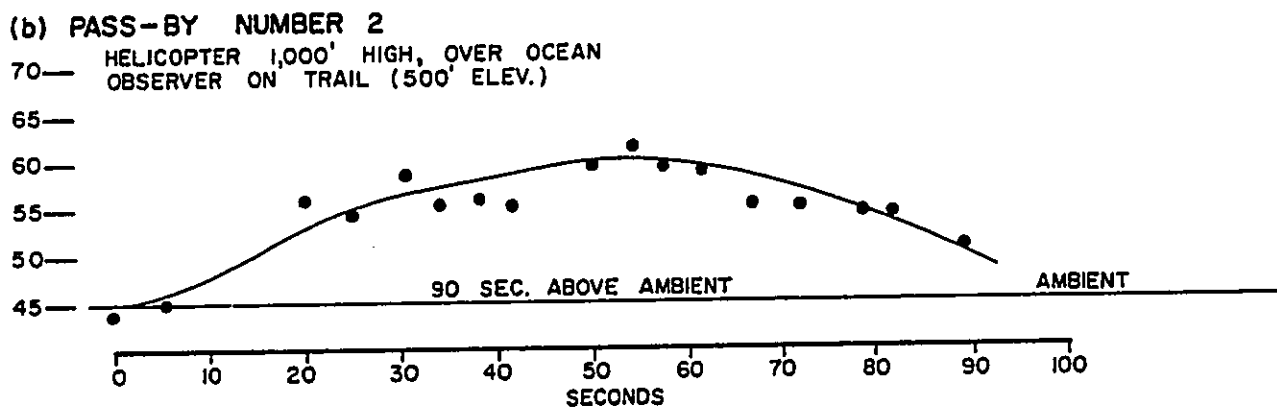
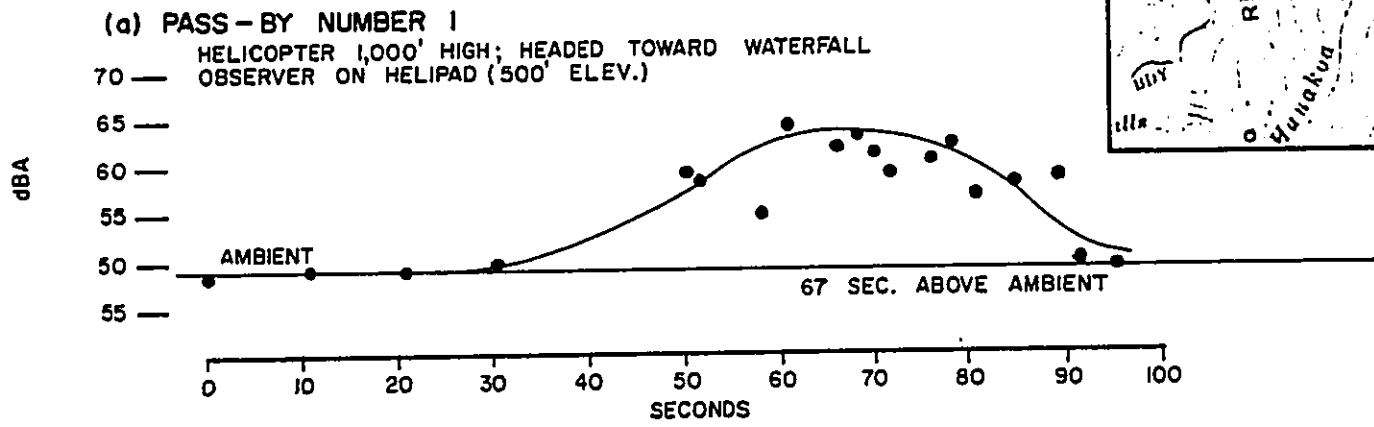
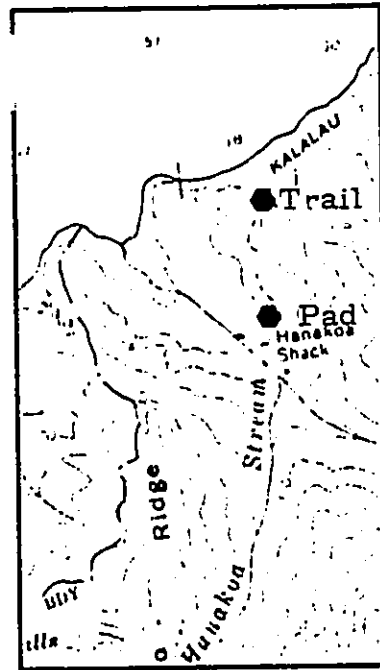


FIGURE II
 NOISE READINGS FROM HELICOPTER PASS-BYS
 AND LANDINGS AT HANAKOA VALLEY



The graph in Figure 11c shows the noise readings as recorded by an observer on the trail, at Hanakoa Valley, approximately 1,500 feet from the helipad, as the helicopter passed overhead and landed at the pad. Peak readings were 62 dBA and stabilized at 57 dBA as the helicopter landed on the pad and kept the engine running.

From the data gathered on the field and the available statistics on helicopter operations, a few inferences can be made on the total noise impact created by helicopters operating on the Na Pali Coast.

- a) While helicopters are on the landing pads with the engine running (as is the case during the brief rest stops on the sightseeing tours, for instance), peak noise levels adjacent to the helicopter will exceed 90 dBA. Beyond 300 feet from the helipad the noise level drops below 70 dBA (Figure 10). The noise impact will be more noticeable in valley locations than in beach areas, due to the lower ambient noise levels in the valleys (45-50 dBA vs. 60 dBA, Figure 11).
- b) A helicopter hovering above the observer will produce noise levels above 90 dBA when the helicopter is only 100 feet above, and around 75 dBA at 500 feet. This situation occurs only briefly in the Na Pali area, usually when the helicopter pilots approach waterfalls at the head of the valleys to afford passengers a better look at them. At other times helicopters do not linger over any particular area.
- c) A typical helicopter pass-by as heard by an observer in a valley will create peak sound levels of 60-65 dBA for a few seconds (15-20 dBA above ambient). The helicopter will be audible for about one minute as it passes by.
- d) A hiker on the trail near the ocean will hear a helicopter pass-by for a longer period of time, measured at 60 - 90 seconds. Peak noise readings, again lasting only a few seconds, would be in the 60-65 dBA range for the normal helicopter cruising altitude.

e) On a peak summer day, a hiker on the Kalalau Trail would hear a maximum of 18 to 22 helicopter pass-by's. This would create noise levels above the background lasting between 27 and 33 minutes per day. This situation would take place only rarely. A more common daily exposure to helicopter pass-by's would be about 6 - 10 a day, with cumulative length of 9-15 minutes. Hikers deep in the valleys would be exposed to helicopter noise less frequently, and for a smaller length of time.

Even though the cumulative noise exposure amounts to only a few minutes time, the repetitive nature of the noise throughout the day is objectionable to many hikers and can detract from the wilderness experience (see following discussion on "Wilderness Experience").

f) Noise levels are greatest at take offs and landings, exceeding 100 dBA 50 feet from the pad, and not reaching 65 dBA until the observer is 2,500 feet from the pad. Typical noise exposure during take off at Kalalau Beach is shown on Figure 10. It can be seen that moving the pad reduced the noise exposure at the main beach area by at least 10 decibels.

3. Benefits of the Helicopter Operations. The presence of the helicopter operations in the Na Pali Coast provides recreational opportunities to people that would normally not be able to see the Na Pali Coast by hiking the difficult trail to Kalalau. Helicopters are able to fly up the valleys and over the ridges, allowing passengers to view the scenic areas from perspectives that would be impossible to achieve by any other means (even by the boat tour alternative).

Helicopters provide the fastest and most reliable means of transporting sick or injured hikers out of the Na Pali area. An average of eight persons are evacuated every month by helicopter as a result of accidents or health problems.

In addition, helicopters are regularly chartered by State personnel for transportation to the Na Pali Coast for maintenance and other purposes. Trash accumulations are periodically removed from the area by helicopter personnel.

B. SECONDARY IMPACTS

As previously mentioned, these impacts are considered secondary because they stem from the activities of people dropped off by helicopters on the Na Pali Coast, or from the noise and visual intrusions created by the helicopter operations. The secondary impacts that have been identified are:

1. Health and Sanitation. The streams of the Na Pali Coast have poor water quality from the health standpoint, a situation resulting from contamination by human and feral goat wastes. Signs have been posted warning campers to boil water before drinking, as there is a threat of contracting diseases from drinking contaminated water.

Any growth in the number of campers allowed into the area would correspondingly increase the level of water contamination and the threat of disease unless adequate sanitation measures are taken. The "Haena-Na Pali Recreation Plan" recognizes this problem as a high priority item that can be alleviated by provision of adequate sanitation facilities. Present facilities might be adequate if current levels of usage are reduced.

2. Litter. An increase of visitors in a natural area is usually accompanied by litter problems. The Na Pali Coast, especially the valleys and beaches that can be reached by means of the Kalalau trail, has experienced litter and trash buildups in the past. To the extent that helicopter operations bring campers and day users into the Na Pali Coast they can be said to contribute to the litter problem in the Na Pali Coast.

On the other hand, helicopters are uniquely suited to carry trash out of areas that are inaccessible by other means of transportation. Both helicopter firms have stated their willingness to cooperate with the Division of State Parks in carrying trash out of the Na Pali area on a regular basis as part of their operations. Overall, the effect of helicopter operations on the trash problem in the Na Pali Coast can be considered beneficial.

3. Archaeological Sites. Whenever sensitive archaeological sites become accessible to significant numbers of people, there is the danger of deliberate destruction by thoughtless "souvenir hunters" or inadvertent damage by people unaware of the presence of the sites.

Despite the mitigation measures that can be taken (See Chapter V), there is always the possibility of damage to archaeological sites as a result of bringing people in by helicopter (or any other means of travel). There are a number of sensitive sites, such as burial caves, but most are not easily accessible. A notable exception is the burial caves at Nualolo Aina. Most of the sites in the vicinity of the landing pads are not easily damaged, such as taro terraces. However, a more thorough assessment of these sites is needed to establish their value and susceptibility to damage.

4. Rare and Endangered Plants. Although the environment of the Na Pali Coast is not a true wilderness as a result of prior human habitation and cultivation, certain areas not reached by goats still contain some rare and endangered plants (See Chapter II). Helicopter-transported passengers dropped in the more remote areas of the Na Pali Coast could pose an additional threat to the native flora by spreading exotic species .

5. Disturbance of Wildlife. This potential impact has been brought up citing examples of birds being startled by low-flying helicopters. In the Alakai Swamp area, it is possible that low flights and prolonged hovering disturbs the endangered forest birds; ceasing these practices would eliminate this danger. There is no evidence, however, that the helicopters have any lasting adverse effect on the birds along the Coast (J. Sincock, pers. com.).

6. The Wilderness Experience. In Hawaii the opportunities for extended backpacking trips are limited. There are only a few areas in the State where backpackers may obtain a "wilderness" type of experience. Na Pali, of these few areas, is of great importance to those who enjoy this sport. While the Na Pali Coast is not a true wilderness, one can obtain a "wilderness" type of experience. The main components of the wilderness experience are immersion into the natural environment and isolation from modern society. Those selecting a wilderness experience find that difficulty of access to an area is a necessary element of this experience. Areas which are difficult to get to (requiring a long hike, for instance) are less likely to have large numbers of people.

The difficulty of the hike can often be its own reward, giving the hiker a sense of accomplishment. Hikers seeking a wilderness experience often find that the presence of motorized transportation decreases the value of the experience. The presence of modern technology and the noise of engines may break the psychological isolation from modern society that the backpacker seeks. The knowledge that others can enter the Na Pali Coast without a long hike may also spoil the hikers feeling of accomplishment.

However, some campers may find the presence of motorized transportation comforting in knowing that in an emergency, help is only a short helicopter or boat ride away. Other campers may enjoy immersion into the natural beauty of the area, but not find a lengthy hike very rewarding. This is evidenced by the numbers of people who hike into Kalalau, but elect to leave by motorized transportation.

Many campers seem to enjoy the presence of other campers for the sense of "community" it provides and may not desire the isolation from other people that other campers may seek. Unfortunately, there is a limited distance one may travel from civilization on the Na Pali Coast by foot. Since hikers can only travel as far as Kalalau, one can never get more than one day's hike from the trail head. However campers utilizing boats and helicopters can escape to the more isolated and normally inaccessible valleys west of Kalalau. While these campers do not achieve the rewards of a long hike, the more remote valleys and beaches have few other campers. The absence of other people and the beauty of these isolated places may also provide a "wilderness experience", aside from the means of reaching it.

7. Air Quality. The presence of helicopter operations in the Na Pali area represents a regular introduction of mobile source emissions into an otherwise pristine area. While idling on the pad, odor from the helicopter is often noticeable. Although the concentrations of pollutants may be low, the effect on the perceived wilderness quality is adverse. Limiting the time on the pad will reduce this impact.

CHAPTER V. MITIGATION MEASURES

A. PRIMARY IMPACTS

Controls on the locations where helicopters are allowed to land, the number of passengers dropped and the hours of operations are the main measures available to the Division of State Parks for mitigating adverse impacts stemming from helicopter operations on the Na Pali Coast. The goal of these mitigation measures would be to insure that the carrying capacities of different sections of the Na Pali Coast are not exceeded and that no irreparable harm results to the fragile resources of the area. These mitigation measures are discussed in more detail in Chapter VII, Section B, Restricted Landings Alternative. Other specific measures that can be taken to minimize adverse secondary impacts are listed below.

B. SECONDARY IMPACTS

1. Health and Sanitation. Threats to the health of campers and picnickers can be reduced by:

- (a) Limiting the number of people allowed into the area.
- (b) Constructing adequate sanitation facilities at all camping areas.
- (c) Indoctrinating people brought in by helicopter or other means of access on the need for boiling water before drinking and other preventive measures.
- (d) Continuing the practice of providing rescue services for sick or injured campers and hikers.

2. Litter. The litter problem can be significantly controlled by establishment of a regular schedule of trash pickups by helicopters at designated landing sites, provision of an adequate number of trash receptacles at those sites, periodic maintenance of trails, education of campers and strict enforcement of anti-litter rules.

3. Archaeological Sites. Archaeological sites that have been surveyed can be protected through proper supervision by park rangers and the posting of interpretive signs. Sites that have not been fully surveyed and are especially fragile can be made off-limits to campers and hikers. Personnel of the two applicant helicopter companies will brief passengers on the fragility of the archaeological resources of the Na Pali Coast.

4. Rare and Endangered Species. Areas in the Na Pali Coast that are found to contain notable examples of rare and endangered species can be marked and made off-limits to hikers.

C. VOLUNTARY REGULATIONS (DRAFT VERSION)

1. There will be no landings along the Na Pali Coast between Haena and Kalalau (excluding the existing Kalalau heliport), except when requested by the State for emergencies, trail maintenance, trash removal or other official purposes.
2. From Kalalau to Milolii Beach, landings will only be made at appropriate sites. Approach and departure paths will be established to minimize disturbance to other users.
3. Except for emergencies and official State business, landings and take-offs at Kalalau Beach will be limited to the periods of 8:00 AM to 9:30 AM and 3:30 PM to 5:00 PM.
4. No campers will be dropped-off without a camping permit issued for that site by the appropriate State agency. The camper will be responsible for scheduling his departure in accordance with the time limit of the permit. The helicopter firms will not issue camping permits on behalf of the State.
5. Day users that are dropped off and picked up by the helicopter firms, will be limited to a total of 360 persons per month for the Na Pali Coast from Kalalau to Milolii Beach. No more than 24 day users will be brought to a given site in a single day. Day users will be required to obtain a permit from the helicopter operator, who will report day use activity to the State on a monthly basis. This permit will identify the user, his destination, intended activities and any other information that will be useful for monitoring the use of the Na Pali Coast.

6. Rest stops used for scenic tours will be located away from areas of other recreational use.
7. Free transportation will be provided for State personnel, on a space available basis. Free trash removal will also be provided when requested, on a space available basis.
8. All helicopters will be clearly marked with the name of the firm, so that any violations can be identified and correctly reported.

CHAPTER VI. UNAVOIDABLE ADVERSE IMPACTS

A. NOISE AND VISUAL INTRUSION

Although these impacts can be partially mitigated by controlling the number, location and hours for helicopter landings, they cannot be fully avoided. Helicopter noise and visual intrusions often constitute an unacceptable disturbance to those hikers that visit the Na Pali Coast wishing to attain a true "wilderness experience".

B. SECONDARY USER IMPACTS

Any human use of the natural environment will have some adverse impacts that occur in proportion to the number of people introduced into the area. In areas accessible by trail, the helicopter-transported campers account for only a minor proportion of the total impact. In areas not accessible by trail, helicopter and boat passengers account for the full impact.

The secondary adverse impacts resulting from helicopter-transported passengers in the Na Pali area have been discussed in Chapter IV and V. Although many mitigation measures can be taken to minimize those impacts, the only way they can be totally eliminated is to forbid access to the Na Pali Coast.

CHAPTER VII. ALTERNATIVES TO THE PROPOSED ACTION

A. UNRESTRICTED LANDINGS

This alternative would allow both companies to land anywhere in the Na Pali area with no restrictions placed on the number of passengers brought in or the hours of operation. The short-term impacts of this alternative would not be substantially different from those discussed in Chapter IV, as both companies have an established pattern of sightseeing tours and passenger drop offs that would not change significantly in the near future, and have offered to limit day-use dropoffs to no more than 360 people per month for the whole area, and to have no more than 24 users at any specific point during that day.

If no restrictions are placed on the helicopter operations and no monitoring of impacts is established, it is possible that the carrying capacities of some Na Pali Valleys and beaches can be exceeded in the future as a result of helicopter operations. This situation would result from the growth of helicopter passenger drop offs stemming from the increasing popularity of the area. (This scenario is not contemplated due to the voluntary restrictions on dropoffs that the helicopter companies have adopted.)

This alternative, if implemented, would only be in force for a short time, since, as previously discussed, the Division of State Parks is in the final stages of preparing a management plan for the area. This plan will establish a mechanism for monitoring the helicopter operations in the area and will undoubtedly place some limitations and restrictions on their operation. Some of the possible restrictions that might be instituted are discussed below.

B. RESTRICTED LANDINGS

The restricted landings alternative would consist of granting CDUA's for helicopter landings, with certain restrictions stipulated. These restrictions could include the number of landing sites, the number of camper drop offs, and the hours during which landings could occur.

Limiting helicopter landings to a few sites would protect the rest of Na Pali Coast from the impacts of helicopter landings while allowing this service to continue. However, the options for helicopter travelers would be more limited. Limiting landings to a few sites would

also concentrate landings in a few areas, subjecting them to heavier use (unless total number of landings at those areas are limited).

By limiting both the numbers of campers that may be dropped off and the sites at which they can be landed, the Division of State Parks can effectively control helicopter-generated use. If coupled with controls on the boat landings and the number of hikers allowed on the trails, the State can effectively insure that the carrying capacities of the valleys and beaches of the Na Pali Coast are not exceeded. However, the carrying capacities for different areas has not yet been determined.

Limiting the hours during which helicopter landings can occur would lessen the noise disturbance to campers near landing sites. If the total number of landings are concentrated in a few hours a day, long periods could be provided with no disturbance from helicopter landings.

Application of any or a combination of all of these restrictions will affect the parts of the Na Pali Coast in different ways. When considering these restrictions, beaches accessible by foot should be assessed separately from those inaccessible except by boats and/or helicopters.

Hanakapiai, Hanakoa, and Kalalau are all accessible by trail. Restricting the hours that helicopters are allowed to land at these beaches would reduce the disturbance to campers near the landing sites. Landing hours is an important consideration for these beaches, as camping activity is high and large numbers of campers are affected by the noise and visual intrusion of the landings. Limiting the numbers of campers the helicopters are allowed to drop off will do little to reduce crowding and over use of these beaches and valleys, as only 11.5% of the campers at Kalalau arrive by air.

Similarly, elimination of all helicopter landings on Kalalau, Hanakapiai and Hanakoa will do little to reduce numbers of campers. It will, however, totally eliminate intrusive affects of helicopter landings on these beaches leaving boats as the only non-pedestrian form of access. Without regular helicopter landings, it will be more difficult to acquire their services in emergencies, unless some form of communications is provided at each of the camping areas.

Many campers find that the more difficult access to an area, is the higher the quality of the wilderness experience. For these people elimination of helicopter service will increase the value of their wilderness experience. Other campers, however, may value the

sense of security that the presence of a helicopter provides. These campers who are not primarily interested in isolation may find the knowledge that help is only a short helicopter ride away their enjoyment of the experience.

Honopu, Nualolo Aina, Nualolo Kai, Milolii and essentially all of the coast west of Kalalau is inaccessible by foot. During the winter months when boat travel is restricted, many of these areas are only accessible by helicopter. Elimination of helicopter service to any of these beaches would effectively eliminate any access to them except by boat (when weather conditions allow) or by the exceptionally adventurous, who take the hazardous swim or climb down into these beaches and valleys.

Overall, the granting of a CDUA with restrictions will allow helicopter service to continue while establishing State control over where and when helicopter landings occur. However, it may be difficult to determine in advance what sort of restriction should be placed on helicopter landings without prior monitoring and establishment of a detailed management policy for the Na Pali Coast.

C. RELOCATION OF LANDING PADS

The old heliport on Kalalau Beach was located very near the vegetation line and within clear sight and earshot of most of the campers on that beach. The impact of the noise and visual intrusion of a landing was greatly reduced by relocating the heliport at a location where it would not be visible or audible to a majority of campers (See Figure 10). The old site would be maintained for trash removal and emergency landings. Relocation of all heliports for the purpose of minimizing impacts to users of the area would do much to eliminate the major complaint against helicopters.

D. NO LANDINGS

This alternative would result from the denial of CDUA's filed by both companies for the purpose of helicopter landings in the Na Pali Coast. The presence of helicopters in the area would not be completely eliminated by this alternative, since helicopter sightseeing tours without landings do not require approval by the DLNR.

Any adverse impacts resulting from the presence of helicopter-transported overnight campers and day-use picnickers would be eliminated by this alternative. On the other hand, as previously discussed, this alternative would limit the mode of access only to boat travel under favorable weather conditions.

Suggestions have been made that the State construct trails into these valleys. However, due to the steep topography, construction of a trail would be dangerous. It would also be much more difficult to regulate the numbers of people entering this part of the coast by trail than it would be to regulate boat and helicopter drop offs. Increased numbers of campers entering by trail would endanger the natural environment and archeological resources of these areas. Elimination of helicopter drop offs will add to the experience of those who come to Na Pali for solitude and resent the presence of helicopters. It will however, detract from the experience for those who need the psychological security that the helicopters provide. At present the helicopter companies remove trash as a free service. If the CDUA is denied, the State will have to rely entirely on the boat tour operators for trash removal or to contract for a service it now receives free. Emergency helicopter evacuation will still be available as helicopters can be flagged down during scenic tours.

CHAPTER VIII. THE RELATIONSHIP BETWEEN SHORT TERM
USES AND LONG TERM PRODUCTIVITY

Permission to land helicopters in the Na Pali Coast affects the present use of the area for recreational activities, but it does not foreclose or limit the possible uses of the Na Pali Coast in the future.

The proposed action does not involve any long term commitment to any type of use, as permission for helicopter landings can be withdrawn in the future. The long term trade offs between conflicting uses of the area can be determined by the Department of Land and Natural Resources in the Haena-Na Pali Coast Recreation Plan.

CHAPTER IX. IRREVERSIBLE AND IRRETRIEVABLE
COMMITMENT OF RESOURCES

The only significant irretreivable commitment of a commercial resource involved in this action is fuel for the helicopter operations. The amount of fuel consumed per helicopter passenger is substantially higher than other modes of transportation.

The inaccessibility of parts of the Na Pali Coast has helped preserve their archaeological resources and rare and endangered species of plant life. The more people that can gain acces to these sections by means of helicopters, the greater the potential for damage to these resources. Although measures can be taken to reduce the possibility of damage to these resources to a minimum, this possibility cannot be totally eliminated.

CHAPTER X. REQUIRED APPROVALS

Because the proposed action involves State lands, a State Land Use Permit is required; since the land is classified as Conservation District, this permit is handled through the Conservation District Use Application procedure. This Environmental Impact Statement has been required as a part of the CDUA procedure; it must be accepted by the Board of Land and Natural Resources for the Board to take positive action on the application.

The requested helicopter landing sites (except for Kokee) are within 100 yards of the shoreline (vegetation line), so review with regard to the Special Management Area is required from the County of Kauai. The necessary applications have been submitted, along with this EIS, to the County Planning Department.

Since Honopu, Awaawapuhi, Nualolo Aina and Nualolo Kai are not currently licensed as heliports ("quasi-public airports"), they will have to be reviewed with respect to the FAA standards and licensed by the State Department of Transportation. If these sites are designated in the management plan, application for licenses will be made by the Division of State Parks.

The proposed action involves no alteration of streams or wetlands; it therefore does not require a Department of the Army Permit ("Section 404" permit).

CHAPTER XI. SUMMARY OF UNRESOLVED ISSUES

Following is a summary of the major issues relating to this project, as they have been expressed in letters and public testimony. Most of these issues relate to the question, "what are the appropriate uses of the Na Pali Coast?" This must ultimately be resolved through the implementation of a comprehensive management plan. The discussion that follows each issue statement summarizes the manner in which this EIS deals with the issue and presents steps taken or contemplated by the helicopter firms or the State that should lead to the resolution of the issue.

Issue: Helicopters (and boats) detract from the wilderness experience and should therefore be prohibited from operating on the Na Pali Coast. **Versus:** Everyone, not only those able to hike in, should be allowed unlimited opportunity to enjoy the Na Pali Coast in its entirety.

Discussion:

These are two extremes that summarize the "use" issue. This EIS considers the noise and visual intrusion to be an unavoidable adverse impact, but recognizes that there are degrees of intrusion as well as degrees of "wilderness experience". Not everyone who goes to the Na Pali Coast does so expecting to achieve maximum separation from other people and the "trappings of civilization". However, those who do expect this are often disappointed, because the Na Pali Coast has become very popular. Preserving the serenity of the area, which is an essential component of the scenic resource, is a primary goal of the Division of State Parks. But it is also felt that, if possible, the range of uses should not be curtailed. The management policy being considered is to partition the uses, in order to minimize their interference. Measures such as restricting helicopters from certain beaches, limiting the number and hours of landing and designating flight paths away from "wilderness experience" areas would reduce the degree of intrusion. The helicopter firms have expressed a willingness to work out ways to modify their operations, but have not been given any guidelines to follow. This EIS presents preliminary data on the noise characteristics of the helicopters, enabling the discussion to center on specific noise levels.

Issue: Access should not be provided for the valleys and beaches beyond Kalalau.

Discussion:

This position is generally supported by two arguments; protection of the archaeological resources, and protection of the mystique of the Na Pali Coast - which is derived, in part, from its inaccessibility. This EIS recognizes that if people are allowed into areas with sensitive archaeological sites, there is a significant potential for adverse impacts. Mitigation measures such as security fencing, supervision and user indoctrination (i. e. warnings of prosecution), could have a positive effect. The Division of State Parks is committed to protecting this resource, but it is also desirable to utilize Nualolo Kai and Milolii Beaches in order to reduce the pressure on Kalalau. A possible solution would be to prohibit drop offs in the valleys, but allow some level of use on the beaches.

Issue: Helicopters cause overcrowding of the beaches.

Discussion:

This EIS presents data from the flight logs of Papillon and Kanai showing that from August, 1977 to July, 1978, a total of 3,845 people were dropped off and 4,374 people were picked up on the Na Pali Coast; 67% more people are picked up at Kalalau than are dropped off. Of the total drop offs, 1,017 were dropped off at Kalalau, including 785 overnight campers. These campers stayed an average of 2.5 days, resulting in 1,960 camper-days at Kalalau attributable to the helicopters. From July, 1977 to June, 1978 (a comparable period), the Division of State Parks records show a total of 17,052 camper-days at Kalalau (based on camping permits). Therefore, the helicopters accounted for approximately 11% of the campers at Kalalau Beach. In contrast, Milolii Beach had a total of 1,175 camper-days, all of which can be attributed to helicopters. Whether or not these volumes of campers constitute "overcrowding" is a question of carrying capacity, and that has not been established for any of the beaches. It is clear, however, that the relative contribution of the helicopters is minor at Kalalau Beach, where the camping use is heaviest.

Issue: There is inadequate water and sanitary facilities on the Na Pali Coast, so more people should not be allowed in.

Discussion:

This EIS presents data showing that the number of people brought in by the helicopters is small in comparison with the number of people who hike in. Furthermore, the helicopters bring people to beaches that are inaccessible by foot, thereby reducing pressure on the accessible beaches. It has not been determined whether or not the carrying capacity of any of the valleys or beaches is being exceeded, since carrying capacity is partly based on management decision as to the level of maintenance an area will receive. For example, the sanitation problem could be solved, without reducing use, by providing more frequent maintenance. Each valley and beach can be managed somewhat separately from the rest, using the available modes of transportation to achieve the desired intensity of use. The allowable intensity of use (determined, in part, by sanitary facilities) is an issue to be settled through the Na Pali State Park Management Plan.

Issue: There should be a moratorium on helicopter landings until the Na Pali State Park Management Plan is completed.

Discussion:

A draft of this management plan is currently being reviewed within the DLNR, and is not yet available for public review. Before it can be accepted, an EIS must be prepared and public hearings held, which is a process that could easily take a year or more to complete. The most controversial impact, and one that might justify such a moratorium, is the perceived loss of wilderness quality by a portion of the people who use the Na Pali Coast. However, to cease the landings would completely preclude use of the Na Pali Coast by an equally important segment of the population. A more equitable solution would be to "experiment" with different mitigating measures to determine, in the field, their effectiveness in reducing the intrusive element of the helicopter operations. The helicopter firms could be granted limited permits to operate until final regulations can be adopted. As noted above, the helicopter firms are willing to modify their activities.

Issue: Allowing helicopter access increases/decreases the State's liability for injuries to users of the Na Pali Coast.

Discussion:

The point has been raised that, by allowing people into remote areas, the State is responsible for their safety. However, the alternative form of access such as swimming to beaches or climbing down steep cliffs are very hazardous. If motorized access to the Na Pali Coast is eliminated, increased numbers of campers swimming and climbing into areas inaccessible by trail, may present a significant liability for the State. This EIS has not attempted to deal with this complicated legal issue; however, the safety aspects of the helicopter operations is considered to be a significant benefit to all users of the Na Pali Coast. In a remote area, any injury or illness can become serious; a sprained ankle or sun stroke might require evacuation just as much as a broken leg. Because of the poor water quality (and poor preparation of some users), intestinal disorders can occur; with the danger of dehydration, immediate evacuation is necessary. Papillon evacuates an average of about eight person per month. If not called by the fire department or other government agency, the evacuation is handled as a regular fare (\$30), but it is not uncommon for no fare to be collected. When called by a government agency, the firm is usually reimbursed. Helicopter drop offs and pick ups provide opportunities for emergency evacuation throughout the day; without regular landings, evacuation could not occur as quickly. The presence of helicopters provides assurance to campers concerned about emergency evacuation, increasing their enjoyment of the Na Pali Coast. However, the point has been raised that the increased safety provided by the helicopter service may decrease the caution of some visitors.

REFERENCES

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

PERSONAL CONTACTS

George Balazs
Hawaii Institute of Marine Biology

Carl Courep
U. S. Fish and Wildlife Service, Oahu

Evan C. Evans, III
Naval Ocean Systems Center, Oahu

Charles Lamoureux
University of Hawaii Botany Department

John Maciolek
U. S. Fish and Wildlife Service, Kauai

Harold St. John
Bishop Museum

John Sincock
U. S. Fish and Wildlife Service, Kauai

APPENDIX A. PARTIES CONSULTED FOR THE PREPARATION OF THE EIS

	Comment Dated
A. <u>FEDERAL GOVERNMENT</u>	
U. S. Army Engineer District, Honolulu	NC
USDI Fish and Wildlife Service	NC
USDA Soil Conservation Service	8/7/78
B. <u>STATE OF HAWAII</u>	
Dept. of Health	8/10/78
Dept. of Land and Natural Resources	
Division of Fish and Game	8/16/78
Division of Forestry	NC
Division of State Parks	8/4/78
Dept. of Planning and Economic Development	8/7/78
Dept. of Transportation	NC
University of Hawaii	
Water Resources Research Center	8/24/78
Environmental Center	8/3/78
C. <u>COUNTY OF KAUAI</u>	
The Hon. Eduardo Malapit, Mayor	NC
Dept. of Economic Development	NC
Dept. of Public Works	8/2/78
Planning Department	8/14/78 (7/13/78)
D. <u>OTHERS</u>	
Hanalei Community Association	NC
Kauai Community Research Group	NC
The Kauai Outdoor Circle	7/31/78
Shoreline Protection Alliance	8/2/78
Sierra Club, Kauai Representative	NC
Life of the Land	NC
Keola Childs	NC
Roy Yee	NC
Dana Peterson	9/20/78
Edwin T. Sakoda	NC
Sierra Club, Hawaii Chapter	NC
Evan C. Evans III	8/27/78
John E. Moriyama	8/2/78
Lennie Lee	NC

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

P. O. Box 50004, Honolulu, HI 96850

August 7, 1978

Mr. Fred Proby
VTN Pacific
1164 Bishop St., Suite 906
Honolulu, HI 96813

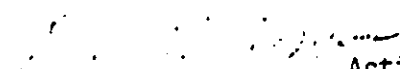
Dear Mr Proby:

Subject: EIS Preparation Notice for Helicopter
Landings on the Na Pali Coast, Kauai

We have reviewed the subject preparation notice and have no comments
to offer.

Thank you for the opportunity to review this document.

Sincerely,


Acting
Jack P. Kanalz
State Conservationist





Engineers • Architects • Planners

September 15, 1978

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

Mr. Jack P. Kanalz
State Conservationist
Soil Conservation Service
P. O. Box 50004
Honolulu, Hawaii 96850

Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Kanalz:

We are in receipt of your letter of August 7th and understand you have no comments to offer at this time. A copy of the full EIS will be sent to you as soon as it is ready.

Yours sincerely,

Fred L. Proby
Chief Environmental Scientist

FP:db

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



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

August 10, 1978

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: EPHS - SS

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

Dear Mr. Proby:

Subject: Request for Comments on Proposed Environmental Impact Statement (EIS)
for Helicopter Landings on the Na Pali Coast, Kauai, Hawaii

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

1. The applicants propose landings at various sites along the Na Pali Coast for the purposes of camper/picnicker drop-offs and scenic stops. 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 (except for Kokee and Polihale).
 - 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.
 - c. Comments and recommendations made on environmental health in the Haena-Na Pali Coast Recreation Plan, Draft #2, written by the Department of Land and Natural Resources should be strongly considered.
2. The applicants also propose to transport State personnel on official business and emergency landings for rescue and evacuation operations. We have no objection to these types of operations.
3. The EIS should cover the impact on the surrounding areas of the landing sites from the noise of the helicopters.

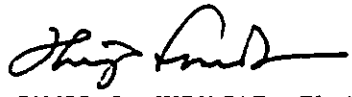
Mr. Fred Proby

-2-

August 10, 1978

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,


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

cc: DHO, Kauai

A-5



Engineers • Architects • Planners

September 14, 1978

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

Dr. James S. Kumagai, Ph. D.
Deputy Director for Environmental Health
Department of Health
P. O. Box 3378
Honolulu, Hawaii 96801

JN 18-103

Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Na Pali Coast, Kauai, Hawaii

Dear Dr. Kumagai:

Thank you for your comments on the subject Preparation Notice.
Following are responses to your specific comments:

1. We acknowledge your opposition to the camper/picnicker drop-offs and scenic stops by helicopters on the Na Pali Coast. The reasons for your opposition will be listed and discussed in the EIS.
2. Our clients' proposal to continue their practice of transporting State personnel on official business and participating in rescue missions will be presented in the EIS.
3. The noise impact of the helicopter operations will be addressed in the EIS.

Finally, we are aware of the general nature of your comments, and of your right to impose future environmental restrictions on the proposed action. A copy of the EIS will be sent to you as soon as it is available.

Yours sincerely,

Fred L. Proby
Chief Environmental Scientist

FP:db

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



DIVISIONS:
CONVEYANCES
FISH AND GAME
FORESTRY
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FISH AND GAME
1151 PUNCHBOWL STREET
HONOLULU, HAWAII 96813

August 16, 1978

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

Dear Mr. Proby:

This is in response to your letter (July 24, 1978) and EIS Preparation Notice regarding helicopter landings on the Na Pali Coast, Kauai.

Where applicable, the forthcoming EIS should address the potential impact on the aquatic environment, particularly with respect to the aquatic resources that may be affected by the increased number of people visiting the area and the methods proposed to mitigate such impact. In addition, the EIS should discuss specific potential impacts on (1) hunter activities (disturbance to game and the hunting experience) and (2) wildlife species such as game birds, native forest birds and shorebirds (in addition to the Newell's shearwater mentioned in the notice). Other than this, the notice is adequate in delineating what the EIS will contain.

Thank you for providing us the opportunity to comment on the subject EIS Preparation Notice.

Sincerely yours,

A handwritten signature in black ink that reads "Kenji Ego".

KENJI EGO, Director
Division of Fish and Game

cc: Planning Office .

KE:FB:mo



Engineers • Architects • Planners

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

September 14, 1978

Mr. Kenji Ego
Director
Division of Fish and Game
Department of Land and Natural Resources

Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Napali Coast, Kauai, Hawaii


JN 18-103

Dear Mr. Ego:

Thank you for your comments on the subject Preparation Notice.
Following are responses to your specific comments:

1. The potential impacts on the aquatic environment from the proposed action as an indirect result of visitors to the area will be discussed, where applicable, in the EIS.
2. In addition, consideration will be given to potential impacts on hunter activities and wildlife species.

Yours sincerely,


Fred L. Proby
Chief Environmental Scientist

FP:db

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



W. Y. THOMPSON, CHAIRMAN
BOARD OF LAND & NATURAL RESOURCES

EDGAR A. HAMASU
DEPUTY TO THE CHAIRMAN



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

DIVISIONS:
CONVEYANCES
FISH AND GAME
FORESTRY
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

August 4, 1978

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

Dear Mr. Proby:

SUBJECT: EIS Preparation Notice for Helicopter
Landings on the Na Pali Coast - Ref: JN 18-103

Thank you for the opportunity to review the subject EIS Preparation Notice and for previous opportunities to discuss the Na Pali Coast with your staff. We have recently completed a draft Na Pali State Park Management Plan. This is currently being reviewed within the Department of Land and Natural Resources (DLNR) prior to public review.

We anticipate that helicopter landing sites will be limited to those designated in the management plan. These sites must all meet FAA standards and be licensed by the Department of Transportation. The licenses for a "Quasi Public Airport" are being issued to the DLNR and the State Parks Division. will, in turn, issue landing permits to commercial operators. These permits can include restrictions as indicated on Page 13 of the preparation notice.

Section IV. Probable Impacts and Mitigation Measures will need substantial expansion to satisfy environmental concerns we have. This includes at least two general areas of concern which have not been identified. The safety of parkvisitors is of primary concern and involves both the safety of the landing site for the passenger and the safety of the site for other visitors already in the neighboring park areas. Some sites, particularly those located away from the beaches, are likely to have an impact on the rich archaeological values of the Na Pali Coast. An indirect adverse impact involves making certain archaeologically fragile areas much more accessible to the general public.

The Description of the Proposal Action should also be expanded to include the operators plans for the area, their current

Mr. Proby

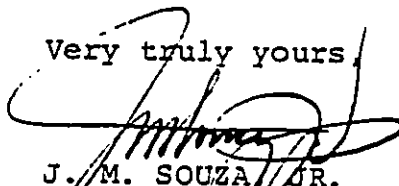
- 2 -

August 4, 1978

operations and trends from the past years of operation. Data on existing numbers of flights, landing areas and people transported should be available. Expected growth of operations should be included. We note, for example, that Papillon has brochures offering various tour packages. How many people have gone on these tours and what impact have these tours had on the environment?

We hope the comments are helpful and would be glad to discuss the Draft EIS with you before it is submitted to the Environmental Quality Commission.

Very truly yours,



J. M. SOUZA JR.
State Parks Administrator
Division of State Parks

cc: Mr. T. Yamamoto
Mr. G. Niitani



Engineers • Architects • Planners

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

September 15, 1978

Mr. J. M. Souza, Jr.
State Parks Administrator
Division of State Parks
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Subject: Comments on the EIS Preparation JN 18-103
 Notice for Helicopter Landings on
 the Na Pali Coast, Kauai, Hawaii

Dear Mr. Souza:

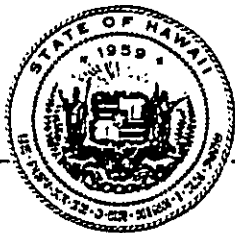
Thank you for your comments on the subject Preparation Notice. Our clients' are aware of the forthcoming Na Pali State Park Management Plan and will abide by the restrictions imposed on the numbers and uses of the helicopter landing sites by your department.

Your concerns regarding the proposed action's impact on the safety of park visitors and on archaeologically fragile areas will be discussed in the Environmental Impact Statement. In order to evaluate these and other potential impacts, the EIS will summarize all available data on the helicopter operations, such as the number of flights, numbers of passengers carried, etc.

Yours sincerely,

Fred L. Proby
Chief Environmental Scientist

FP:db



DEPARTMENT OF PLANNING
AND ECONOMIC DEVELOPMENT

Kamamatu 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

August 7, 1978

Ref. No. 6966

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

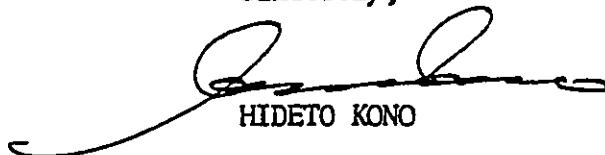
Dear Mr. Proby:

Subject: EIS Preparation Notice - Helicopter Landings on the
Na Pali Coast

Thank you for affording us the opportunity to review the subject
EIS preparation notice.

We have no specific remarks to offer at this time, but would like
to reserve the privilege of commenting further when the final statement is
available for review.

Sincerely,



HIDETO KONO



Engineers • Architects • Planners
September 15, 1978

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

Mr. Hideto Kono
Director
Department of Planning and Economic Development
State of Hawaii
Honolulu, Hawaii


Subject: Comments on the EIS Preparation JN 18-103
 Notice for Helicopter Landings
 on the Na Pali Coast, Kauai, Hawaii

Dear Mr. Kono:

Thank you for your letter of August 7, concerning the subject notice.
We understand you have no specific comments to offer on the Notice of
Preparation.

A copy of the EIS will be sent to you as soon as it is completed. We
look forward to receiving your comments during the EIS review period.

Yours sincerely,


Fred L. Proby
Chief Environmental Scientist

FP:db

UNIVERSITY OF HAWAII

Water Resources Research Center

August 24, 1978

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

Dear Mr. Proby:

SUBJECT: EIS Preparation Notice for Helicopter JN18-103
Landings on the Na Pali Coast

Thank you for offering the subject EIS preparation notice
for our review.

We feel that each site should be discussed in terms of manage-
ment concerns discussed in paragraph 1 on page 10. Water supply
and waste disposal at each site should also be discussed.

Sincerely,



Yu-Si Fok, Professor
Faculty EIS Review Coordinator

YSF:jm

cc: H. Gee
R. Young

AN EQUAL OPPORTUNITY EMPLOYER

2540 Dole Street - Honolulu, Hawaii 96822

A-14



Engineers • Architects • Planners

September 15, 1978

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

Dr. Yu-Si Fok
Faculty EIS Review Coordinator
Water Resources Research Center
University of Hawaii

Subject: Comments on the EIS Preparation
 Notice for Helicopter Landings on
 the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Professor Fok:

Thank you for your comments on the subject Preparation Notice. The Environmental Impact Statement will discuss each site of the proposed action in terms of the management concerns discussed on paragraph 1 on page 10. The water supply and waste disposal situation at each of these sites will also be covered in the EIS.

yours sincerely,


Fred L. Proby
Chief Environmental Scientist

FP:db



University of Hawaii at Manoa

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

Office of the Director

August 3, 1978

Mr. Fred Proby
VTN Pacific Inc.
1164 Bishop Street
Suite 906
Honolulu, Hawaii 96813

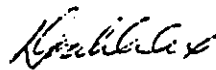
Dear Mr. Proby:

EIS Preparation Notice for Helicopter Landings on the Na Pali Coast

The Environmental Center of the University of Hawaii does not, in general, participate in the preparation stage of the Environmental Impact Statement 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.

Certainly we are available for consultation on an informal basis, however, formal review comments will be limited to the EIS.

Yours very truly,


Doak C. Cox
Director

DCC/aa

cc: Marge Kimmerer



Engineers • Architects • Planners

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

September 15, 1978

Dr. Doak C. Cox
Director
Environmental Center
University of Hawaii
Crawford 317-2550 Campus Road
Honolulu, Hawaii 96822


Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Dr. Cox:

Thank you for your letter of August 3rd, concerning the subject Notice of Preparation. We understand the Environmental Center's policy of not formally participating in the preparation stage of the EIS process, and appreciate your offer to informally consult with us during the preparation of the EIS.

yours sincerely,


Fred L. Proby
Chief Environmental Scientist

FP:db

EDUARDO E. MALAPIT
MAYOR



HENRY MORITA
COUNTY ENGINEER
TELEPHONE 245-3318

CLAY KAGAWA
DEP. COUNTY ENGINEER
TELEPHONE 245-3602

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

August 2, 1978

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

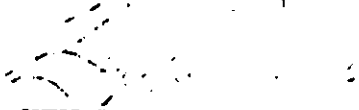
Dear Mr. Proby:

SUBJECT: EIS PREPARATION NOTICE FOR HELICOPTER LANDINGS
ON THE NA PALI COAST

The proposed action for which the E.I.S. will be prepared falls under the jurisdiction of the State's Department of Land and Natural Resources. We normally concur with the comments generated by the agency responsible for regulation of the actions, as they have the specialized knowledge and experience.

Otherwise, we have no comments on the E.I.S. preparation notice.

Very truly yours,


HENRY S. MORITA
County Engineer

hs



Engineers • Architects • Planners

September 15, 1978

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

Mr. Henry S. Morita
County Engineer
Department of Public Works
County of Kauai
Kauai, Hawaii 96766

Subject: Comments on the EIS Preparation
 Notice for Helicopter Landings on
 the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Morita:

Thank you for your letter of August 2, 1978. We understand you have no comments to offer on the subject Notice of Preparation. A copy of the EIS will be mailed to your office.

Sincerely,


Fred L. Proby
Chief Environmental Scientist

FP:db

A-19

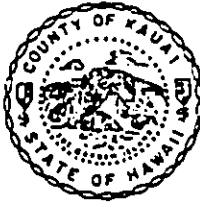
COUNTY OF KAUAI
PLANNING DEPARTMENT
4280 Rice Street Lihue, Hawaii 96766

M E M O R A N D U M

TO: Mr. Fred Proby, Chief DATE: August 4, 1978
Environmental Scientist SUBJECT: EIS Preparation
VTN Notice For Helicopter Landings
FROM: Avery Youn On The NaPali Coast

Relative to your request for comments on the subject project,
we enclose our comments submitted to the Land Board for
your use and information. Should you have any questions,
please contact me at 245-3919.

EDUARDO E. MALAPIT
MAYOR



BRIAN K. NISHIMOTO
PLANNING DIRECTOR

COUNTY OF KAUAI
PLANNING DEPARTMENT
4280 RICE STREET
LIHUE, KAUAI, HAWAII 96766

July 13, 1978

W. Y. Thompson, Chairman
State of Hawaii
Dept. of Land and Natural Resources
P. O. Box 621
Honolulu, Hawaii 96800

Re: Helicopter Landing, Na Pali Coast, Kauai

Applicant: KA - 5/19/78 - 1060 Kenai Air Hawaii
KA - 5/8/78 - 1055 Jack Harter Helicopters, Inc.
KA - 5/17/78 - 1056 Papillon Helicopters, Ltd.

Dear Sir:

In reviewing the above subject applications, it appears that there are too many landing sites now, and that the helicopters are seemingly landing at random. With the exception of Jack Harter Helicopters, Inc., landings are occurring at Kokee, Polihale, Milolii, Nualolo Kai, Nualolo Air, Honopu, Kalalau, Hanakoa, and Hanakapiai. Jack Harter Helicopters has occasional landings to afford a brief rest for passengers, usually at Awaawapuhi. This operation consists primarily of tours, and no drop-offs take place. The other two operators, Kenai and Papillon do provide drop-off services in addition to tours.

We concur with the applicants that the Na Pali Coastline is a major visitor attraction and that they are providing a service which can be an economic benefit to the island. Relative to the sightseeing

Page 2
July 13, 1978

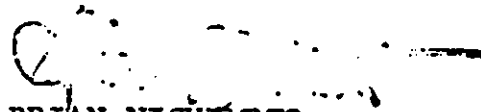
operations itself, we have no objections, provided that no drop-offs along the coastline be allowed. We do recognize the fact that at times rest stops are necessary, and landings should be permitted, however, not at random, but at approved locations. As we have stated in past applications relating to the Na Pali Coast, we feel that the best way to achieve this is to develop a resource management plan for this area, where landing sites, drop-offs, camping, and other uses can be limited and controlled under a single agency.

Except for emergencies, we do not feel that all of the above landing sites requested are warranted. Rest stop locations should be specifically identified and approved by the Department of Land and Natural Resources and the FAA. Except for emergencies, no drop-offs should be allowed by helicopter, and this concern should be a primary topic in the resource management plan. Until such time this plan is completed, we recommend that no drop-offs take place. Drop-offs may be resumed only if the plan finds that this situation can be allowed at certain approved location.

We therefore, have no objections to the helicopter tours which originate and end at approved FAA sites, and which do not drop-off any passengers. We strongly recommend that all drop-offs be ceased, and that landing sites be limited to specific areas (not more than two) for rest stop purposes only. We are willing to assist you in the selection of rest stop sites and more important in the formulation of an overall management plan for the Na Pali Coast. I believe that you would concur with me that the Na Pali Coast is an invaluable resource, deserving special management and care. A comprehensive management plan including specific management goals and objectives must be developed immediately.

Thank you for allowing us to comment on these applications. Please call should any questions arise.

Sincerely,


BRIAN NISHIMOTO
Planning Director

cc: Mayor
Commission
Sam Lee
Take Yamamoto

A-22



Engineers • Architects • Planners

September 15, 1978

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

Mr. Avery Youn
Planning Department
County of Kauai
4280 Rice Street
Lihue, Kauai 96766

Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Youn:

Thank you for your memorandum of August 4, 1978 to which are attached comments on the subject Notice of Preparation your office submitted to the Land Board on July 31, 1978.

We understand your department feels there should be fewer helicopter landing sites at the Na Pali Coast, and that no camper drop-offs should be allowed at those sites.

Your department's concerns will be acknowledged and discussed in the Environmental Impact Statement.

Yours sincerely,

Fred L. Proby
Chief Environmental Scientist

FP:db

A-23



P. O. BOX 921
LIHUE, HAWAII 96766

THE KAUAI OUTDOOR CIRCLE

July 31, 1978

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

Re: EIS Preparation Notice for Helicopter
Landings on the Na Pali Coast
JN 18-103

Dear Mr. Proby:

Thank you for requesting our comments on behalf of Papillon Helicopters, Ltd., Jack Harter Helicopters, Inc., and Kenai Air Hawaii.

We have no specific comments to make at this time but are planning general remarks for the public hearing on August 10 in Lihue.

Sincerely,

THE KAUAI OUTDOOR CIRCLE

Clare Miller

Clare Miller
President

A-24

100% Recycled Bond



Engineers • Architects • Planners

September 15, 1978

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

Ms. Clare Miller
President
Kauai Outdoor Circle
P.O. Box 921
Lihue, Hawaii 96766

Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Na Pali Coast, Kauai, Hawaii

JN 103

Dear Ms. Miller:

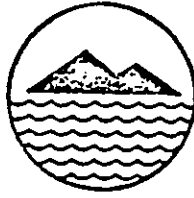
Thank you for your letter of July 31, 1978 and the testimony presented at the hearing on August 10th in Lihue. The issues of concern to the Kauai Outdoor Circle will be given consideration in the EIS, and a copy of this document will be sent to you as soon as it is completed.

Yours sincerely,

Fred L. Probst
Chief Environmental Scientist

FP:db

P. O. BOX 4247
HONOLULU, HAWAII 96813
TEL: 523-2400



SHORELINE
PROTECTION
ALLIANCE

August 2, 1978

Board of Land and Natural Resources
1151 Punchbowl Street
Honolulu, Hawaii 96813

Re: Proposed Boat Tours and Helicopter Landings on the Na Pali Coast

Gentlemen:

We have read the draft EIS for the proposed Na Pali boat tours and the EIS preparation notice for the proposed Na Pali helicopter tours. At this point, we feel that we have sufficient information to make some suggestions to the Board of Land and Natural Resources.

(1) Purely "environmental" problems with both boat and helicopter landings can be adequately mitigated by proper regulation of the hours of tour operations and proper selection of landing sites.

(2) As a condition on landing permits, tour operators can be required to take full responsibility for trash pick-up and maintenance of facilities which serve hikers and campers along the Na Pali coast. This would be much less costly to the State than having to periodically send in State employees to do the same thing.

(3) There is a need to restrict tour landings at remote areas in order to protect the "wilderness experience" for hikers and campers. In particular, we would suggest that boat and helicopter landings at Hanakapiai and Kalalau be limited to at most 2 or 3 per day. For the same reason, we also would suggest that camping permits not be issued to persons on commercial boat or helicopter tours.

Thank you for considering our concerns.

Sincerely,

Douglas Meller
Secretary

cc: Fred Proby



Engineers • Architects • Planners

September 15, 1978

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

Mr. Douglas Meller
Secretary
Shoreline Protection Alliance
P.O. Box 4247
Honolulu, Hawaii 96813

Subject: Comments on the EIS Preparation
 Notice for Helicopter Landings on
 the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Meller:

Thank you for your comments on the subject Preparation Notice addressed to the Board of Land and Natural Resources. We acknowledge your suggestions that landing sites and hours of operations of helicopter activities be regulated and that tour operators take full responsibility for trash pickup and maintenance of facilities in the Na Pali area. The EIS will discuss your concerns and suggestions.

Yours sincerely,

Fred L. Proby
Chief Environmental Scientist

F.P:db

Ms. Dana Peterson
2641 Namau'u Drive
Honolulu HI 96817

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

20 Sept. 1978

Dear Mr. Proby --

I would like to make some comments on your EIS Preparation Notice for HELICOPTER LANDINGS ON THE NA PALI COAST, KAUAI, HAWAII. I appreciate the opportunity to make such comments, and would like to remain a "consulted party" throughout your EIS process.

With these comments, I am representing only myself as a concerned individual. My interest in this matter stems from my past six years of frequent wilderness travel and participation in conservation projects in Hawaii on all the major islands, including Kauai and the Na Pali coast.

There are a number of points which I feel should be very thoroughly addressed in the EIS. They are, in order of their appearance in the Preparation Notice --

1. "Other operations include transportation of State personnel on official business, rescues and evacuations of ill or injured campers". (p.2)

This is potentially a strong argument for continued helicopter operations in Na Pali; therefore it must be thoroughly documented. For example: How frequently do these operations occur? Are they done for fees or gratis? If for fees, based on what criteria, how much is charged, and at what profit margin? If these operations are not performed by the applicants, what other helicopters are available and what are the comparable costs? If the Na Pali touts are no longer allowed and the applicants thus lose the attendant income, will their helicopters still be available (for hire or otherwise) for these operations?

2. "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'" (p.9)

Both boats and helicopters are indeed disruptive to a self-propelled wilderness experience by virtue of their providing motorized access, their intrusive appearance, and their noise production. However, there is an important matter of degree to consider. Helicopters provide quicker, more comfortable, more obvious and much more noisier access than do boats, whether the boats are sailboats, zodiacs or cabin cruisers. Helicopters intrude much more forcibly on the wilderness quality than do boats, both visibly and audibly. The noise of a boat engine is often swept away by winds and wave noises; the noise of a helicopter is impossible to ignore. A boat, by its immersion in the sea, rises and falls with the waves, is subject to currents and wind, and presents a visual aspect more conforming to the elements. There is also the consideration that access by sea to the Na Pali valleys, especially those from Honopu to Milolii, has been the traditional method since the days of the ancient Hawaiians.

I believe that difficulty of access is a very important component of a wilderness area. Access by helicopter is easy (though expensive); access by boat is time-consuming and often difficult due to sea and wind conditions; and access by foot is arduous. Except for the most extreme emergencies and pressing management activities, "rescues" and official business can be conducted via boat. Helicopter access need only be allowed where absolutely necessary to save lives or preserve resources.

3. (in determination of conflicts)". Monitor the landing of boats and helicopters to determine; the location, frequency, and nature of their use; the characteristics of the users arriving and leaving..."

Detailed information of this kind as related to the applicants, for up to the present time, should be provided in the EIS as supportive documentation. What kind of traffic have the applicants been contributing to? In what respects do they anticipate changes, given expected developments? To not provide such information would indicate that the applicants have something to hide, or that they believe past actions will somehow discredit their request for continued operations.

4. "By landing campers and/or picnickers on the beaches, helicopters can contribute to such problems as littering, inadequate sanitation and over-crowding. In general, the more people in an area, the greater the chance for damage to the natural and cultural resources"(p.12)

This is a very strong point against helicopter landings. If the applicants are allowed to continue their landings, what measures will they take to mitigate these problems? Possibly voluntary restriction on number of clients, litter pick-up service, and building (and servicing) outhouses? This should be covered in detail.

5. "The primary impact of this type of operation is the loss of wilderness quality perceived by other users of the area" (p.12)

This is, from my point of view as a frequent visitor to wilderness areas, the one objection that is impossible to compromise on. Helicopter presence is totally incompatible with wilderness character. One goes into a wilderness area to escape the noise and violent intrusions of high technology, and getting into a wilderness area under one's own power is an essential part of that experience. Motorized access destroys the feeling of remoteness from civilization and cheapens the experience of the self-propelled visitor.

6. "The EIS will describe the noise characteristics of the helicopters and will explore various flight routes that would minimize the noise impact" (p.12)

Only by flying at a great distance will the noise and visual impact be minimized enough to be unobjectionable to the visitor seeking a high-quality wilderness experience. By great distances I mean at least 1 mile out to sea or 6,000 feet in elevation (I base these distance estimates on those overflights I have not found obnoxious while I was in backcountry areas). At this distance I do not think a tour service will be very realistic, since the impressive valleys and sea-cliffs must be seen close-up to be fully appreciated.

Further, how will the "noise characteristics" be described? In decibel levels; in percentage of backpackers offended; as compared to a small boat or a DC-7 at the same distance; or by the number of natural noises (waterfalls, waves, birds, winds) temporarily obliterated? The impact of noise is very much an emotional and aesthetic one. How do you contrast a cheapened wilderness experience with profits from a tour service?

7. (under the No Project alternative) "This alternative would only affect helicopter landings in the Conservation District, since the flight themselves have already received approval" (p.13)

Somehow this does not quite ring true. Although the flights have received approval, the location and frequency of the flights will definitely affect wilderness character, and should therefore be under question.

Obviously, I have a bias against motorized access for recreation in wilderness areas, and particularly against helicopters. However, I think the points I have raised are still important, for a good EIS must present a well-documented balance of pro and con.

Again, thank you for the opportunity to comment!

A-29

Sincerely,

 Ms. Dana Peterson



Pacific

1164 Bishop St., Suite 906. Hon., Hi 96813

ENGINEERS PLANNERS

October 6, 1978

Ms. Dana Peterson
2641 Namauu Drive
Honolulu, Hawaii 96817

Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Na Pali Coast, Kauai, Hawaii

JN-18-103

Dear Ms. Peterson

Your response to the subject EIS Preparation Notice was received well beyond the cut-off date, but as the EIS has not yet been submitted, your letter has been considered. Your concise review is appreciated; the EIS addresses the points you have raised, but I would like to make some specific responses:

1. Approximately eight evacuations per month are made by Papillon Helicopters, Ltd, most of which are solicited by campers when the helicopter lands at Kalalau Beach. These are handled as a regular fare (\$30), but if the evacuee is not able to pay, the issue is not pressed. A small percentage of the emergency flights are initiated by the Fire Department, in which case reimbursement is usually made. Because they are based closer to the Na Pali Coast than Kenai Air Hawaii or Jack Harter Helicopters, Papillon is called on almost exclusively for emergency services as well as for State business (eg. inspections and trail maintenance). Because roughly 2/3 of their flights are scenic tours, it is probable that Papillon would remain in business if dropoffs were discontinued (but there would be a serious economic impact). Either Kenai or Harter could be used for Na Pali rescues, but they would be much more expensive. There is no government helicopter available on Kauai.

October 6, 1978

2. The EIS deals at length with the "wilderness experience" issue, but the final resolution lies with the Na Pali State Park Management Plan. As it was last expressed to us, the draft plan recognizes the validity of all present uses, but seeks to manage them to reduce conflicts.
3. The EIS presents the latest data on helicopter traffic; in summary it is minor compared to hiker traffic.
4. Mitigation measures such as you propose will be implemented. Papillon has, without reimbursement, been removing trash and will continue to do so. As for constructing anything (outhouses included), that is strictly the responsibility of the Division of State Parks.
5. Your point of view with regard to the effect of helicopters on wilderness quality is recognized. However, we have received unsolicited comments from other Na Pali "regulars" who do not consider the helicopters especially disturbing. A very broad range of people presently use the Na Pali Coast.
6. The EIS does describe the noise impacts of the helicopters.
7. The point is that helicopters would continue to operate scenic tours along the Na Pali Coast if drop offs were prohibited. Furthermore, these tours would involve brief landings, a use that has been approved, since such landings were being made prior to the passage of Regulation 4 (requiring Conservation District Use Permits). It is recognized that these flights would affect the wilderness experience of some Na Pali visitors, but the activity would not be under the jurisdiction of the DLNR.

A copy of the EIS will be sent to you; your prompt review will be appreciated.

Yours sincerely,


Fred L. Proby
Chief Environmental Scientist

FP:db

EIC-1667
27 VIII 1978

Mr. Fred L. Proby
VTN Pacific Inc.
1164 Bishop Street, suite 906
Honolulu, Hawaii 96813

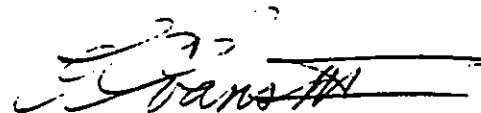
Dear Mr. Proby:

Thank you for the copy of Environmental Impact Statement
Notice of Preparation Helicopter Landings on the Na Pali Coast re-
ceived 11 August.

As you may know, I have long been an ardent protagonist of wilderness areas & have been professionally involved in environmental protection for over 20 years. I have carefully considered the Dept of Land & Natural Resources' recent action to deny helicopter landings in the valleys of the Na Pali Coast. As a member of the Wilderness Society & other conservation groups, I should condone the State's actions, but I find that in this instance there are unique considerations which cause me to reverse my usual view in these matters. My opinions are attached.

Thank you for the opportunity to be consulted in this case.

Sincerely yours,



Evan C. Evans III, PhD
Environmental Specialist & Consultant

27 August 1978

Commercial Helicopter (& Zodiac Boat) Landings on the Na Pali Coast
Environmental Impact Statement, Notice of Preparation
&
Cease & Desist Order by Board of Land & Natural Resources

A. Wilderness Without Access?

I could question the wilderness status of valleys like Kalalau which have been leased for commercial grazing. There are, however, other Na Pali valleys which have not been so treated, thus for the sake of this argument, I accept the current designation of the region in question as a wilderness area. It makes no sense to me to protect a wilderness that cannot be safely entered to be enjoyed as such. Commercial helicopter (& Zodiac boat) landings did provide the only safe means of entry into the valleys of Honopu, Avaavapuhi, Nualolo, Nualolo Kai, & Milolii. By denying landing permits to these two forms of safe transport, the State is in effect reserving a public trust for the sole enjoyment of persons familiar with the Na Pali Coast & having private water transportation in the vicinity. (It must be presumed that local persons owning boats would also be prohibited from ferrying passengers in or out of the Na Pali valleys for a fee, since there is no clear distinction between an occasional service & regular commercial operation.)

B. Safe Entry & State Liability

As stated above, commercial helicopter (& Zodiac boat) landings did provide the only safe entry into 5 of the 8 Na Pali Coast valleys. The valleys of Hanakapiai, Hanakoa, & Kalalau can be safely reached by foot trail, but the remaining valleys can be reached only by:

- a) swimming or surf-boarding - considered unsafe due to currents or sudden changes in weather,
- b) climbing down over the cliffs - impossible or highly unsafe,
- or c) renting a boat - unsafe due to lack of familiarity with local currents, submerged rocks, wave conditions, & the rented boat itself.

Does the State by denying safe entry into lands held in public trust incur some sort of liability? It would seem quite possible. Does the State intend, therefore, to maintain lifeguards or life boats along the Na Pali Coast to protect swimmers & surfers? An expensive proposition. Or does the State imply that it will construct safe trails into the remaining valleys? Again, an expensive proposition & one, incidentally, which itself would require an Environmental Impact Statement. (It might also be noted that the State has more control over entry by commercial helicopter & Zodiac landings than it would have over such trails if they were constructed.)

C. Positive Aspects

I am certainly opposed to unwarranted use of powered vehicles in wilderness areas; however, I find the helicopter to be the least damaging of these. Zodiac boat landings from the sea onto the beaches would also fall into this lowest damage category. I am a frequent visitor & camper in the Na Pali region, getting there by foot, by commercial helicopter, by Zodiac boat, or by a combination of these means. I do not find current helicopter operations objectionable or in significant violation of my sense of the wilderness. In fact, having the helicopters pass by or land occasionally is a positive assurance that in

in the event of emergency, help is only hours away. Such assurance increases enjoyment of any wilderness area. If help is initiated only after one fails to return at a previously agreed time, it can be several days to a week in coming. This fact is always a sobering consideration. Furthermore, Papillon Helicopters & the Zodiac boat people have taken positive steps to improve & assist in the maintenance of the Na Pali wilderness area. They transport litter out of the valleys at their own expense. They provide large garbage bags which a camper can fill & leave for transport out by helicopter. I personally have cleaned up the camp in Nualolo. Papillon Helicopters ferried out four large sacks of other's garbage when we arrived at Nualolo, &, of course, all our own garbage when we left. In these inaccessible valleys this is a real service & one that apparently was not aired in the public hearings on Kauai as reported by the Honolulu Star Bulletin (HSB, 11 Aug 1978, p A-1). This service could be augmented to clean up many of the Na Pali valleys. Certainly I, & many others, stand ready to clean up any of the Na Pali camp sites provided we don't have to pack the garbage out. Pack trains might be used in Hanakapiai, Hanakoa, & Kalalau, but helicopters & Zodiacs are the only means of transport for the remaining 5 valleys.

D. Negative Aspects

The Environmental Impact Statement prepared by VTN implies (p 12) that campers ferried into the Na Pali valleys by helicopter may be a source of litter. Certainly they are not the only source of litter &, as seen by the above, at least some of them are actively cleaning up. Hunters, arriving by means unknown, are also a source of litter, but more importantly, they are the cause of potentially serious pollution. In the fall of 1977, I spent 4 days with a small party in Nualolo Valley. Two flights by Papillon Helicopters ferried us in. We found that hunters had recently gutted their goats directly into Nualolo Stream. Heads, skins, legs, & offal were dumped not beside the stream but into it. We found & removed no fewer than 5 such sources of pollution....2 in the immediate vicinity of the camp site & 3 more upstream. Since the stream is the only water available in Nualolo Valley, such pollution constitutes a serious hazard. On this same occasion, we found many goat snares set & left unattended. This practice seems both pointless & unnecessarily cruel. There was also considerable litter apparently from this same party, litter which we helicopter-campers cleaned up. The previous visitors to Nualolo may also have been helicopter-campers, but circumstances were such that I doubt it.

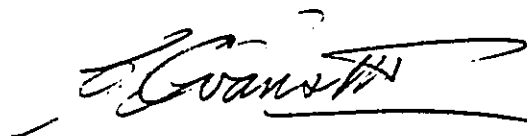
It must also be stated that the landing of helicopters near established campsites is disturbing & can constitute a hazard. I would suggest that a single, safe & proper helipad be constructed in each of the valleys well away from the established campsites. Such construction would appear justified in view of the peculiar accessibility problems of the Na Pali wilderness area.

The Environmental Impact Statement prepared by VTN suggests (p 12) that helicopter landings may disturb nesting seabirds, possibly including the rare Newell's Shearwater. I have landed in most of the Na Pali valleys & have flown by all of them, & have not at any time witnessed the disturbance of seabirds, nesting or otherwise. In fact, there are

no active nesting sites near any of the present helicopter landing sites.

E. Grandfather Clause Considerations

According to the Environmental Impact Statement prepared by VTN (p 2), Jack Harter Helicopters, Inc (withdrawn) has only offered scenic tours of the Na Pali Coast with occasional landings "to allow passengers to stretch and take photographs" (p 12). It would then seem that Harter's "grandfather rights" are fairly limited to just such use & are not properly extendible to include pickups & dropoffs. Finally, from the standpoint of wilderness protection, it makes absolutely no sense to permit the operation of one commercial helicopter company while denying essentially the same operation to two others.



Evan C. Evans III



Engineers • Architects • Planners, Surveyors, Environmentalist

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

September 18, 1978

Dr. Evan C. Evans III
P.O. Box 997
Kailua, Hawaii 96734

Subject: Comments on the EIS Preparation
 Notice for Helicopter Landings on
 the Na Pali Coast, Kauai, Hawaii

Dear Dr. Evans:

Thank you for your review of the subject Preparation Notice and for expressing your views on use of the Na Pali Coast. You have raised several important issues which we will be discussing in the EIS. The degree and type of access is, of course the primary issue, and is one that can only be resolved by the Division of State Parks. The Environmental Impact Statement will be completed soon, and a copy will be forwarded to you.

Sincerely,

Fred Proby
Chief Environmental Scientist

JOHN E. MORIYAMA
717 Olokele Ave., Apt. 2A
Honolulu, Hawaii 96816

August 2, 1978

Mr. Fred Proby
VTN Pacific
1164 Bishop St., Suite 906
Honolulu, HI 96813

The following are my comments to the "EIS Notice of Preparation for Helicopter Landings On the Na Pali Coast, Kauai, Hawaii,"

1. Since the helicopter landings have been made on a regular basis in the past (page 1), would the upcoming EIS be able to document the level of use the area has experienced, and of roughly estimating the resulting impact to the environment? A description of the existing data of past usage would be helpful. Also past records of litter and noise complaints would be useful.
2. What kind of user-audience is this entire helicopter service geared for? Information on the types of people who used this service in the past would be appreciated.
3. What steps will the helicopter operators take to "educate" the passengers as to the fragility of the area they are visiting? What kind of other "reminders" regarding sanitation, litter, etc. will be taken? Will the helicopters perform any services to minimize the impact of the passengers to the wilderness area?
4. Please justify how landings can be requested for Kalalau and Hanakoa when both are accessible by land. Please describe what kinds of trips to Hanakapiai would be considered "rare occasions."

Thank you.

Sincerely yours,

John E. Moriyama
John E. Moriyama



Engineers • Architects • Planners

September 15, 1978

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

John E. Moriyama
717 Olokele Avenue, Apt. 2A
Honolulu, Hawaii 96816


Subject: Comments on the EIS Preparation
Notice for Helicopter Landings on
the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Moriyama:

Thank you for your comments on the subject Notice of Preparation. We are currently compiling all the available data on the helicopter operations in the Na Pali Coast. The EIS will summarize this data and discuss the areas of concern to you, such as the impacts stemming from the current and projected levels of use, the measures taken to minimize adverse impacts and the justification for the different landing sites proposed. A copy of the EIS will be sent to you as soon as it is completed.

Yours sincerely,


Fred L. Proby
Chief Environmental Scientist

FP:db

Letters received after the EIS Preparation Notice comment deadline

P.O. draft thanks.

EDUARDO E. MALAPIT
MAYOR



8255
Page RECEIVED KURITA
DIRECTOR

78 SEP 22 A 9:15

COUNTY OF KAUAI
OFFICE OF ECONOMIC DEVELOPMENT
4396 RICE STREET
LIHUE, KAUAI, HAWAII 96766
TELEPHONE 245-4556

DEPT. OF LAND
STATE OF HAWAII

August 23, 1978

Rec'd Plng. Ofc SEP 25 1978
By
Gordon _____ Estelle _____
Aki _____ Post _____
Roger _____ Library _____
Lon
File in EA-1056
Return to _____

Mr. W.Y. Thompson, Chairman
Board of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Thompson:

Subject: Comments on the EIS Preparation Notice for
Helicopter Landings on the Na Pali Coast

The following are the concerns and comments regarding the EIS
Preparation Notice and the Conservation District Use Applications
for the requested landing sites on Kauai's Na Pali Coast.

The continued and sanctioned use of the Conservation and State
Park lands in question by helicopters is not without impacts. Some
of the more obvious impacts have been brought out at past public
hearings and by the media. Those impacts considered important by
my staff are as follows:

- 1) Sanctioned landings will lead to increased use of the Na Pali area, especially areas not accessible from land. This may bring about further rises in the costs of maintaining these areas.
- 2) There may be a conflict with the concept of intended use. The use of Polihale and the Kokee Lodge area as staging areas are two examples. People go to these areas to get away from the noise and disturbances of the urban areas.
- 3) These helicopter flights enhance the tourist industry by offering the tourists an added attraction, one possible only by helicopters. Sanctioning these landings at appropriate areas will help the companies offering these services by establishing parameters by which to operate.
- 4) Noise and its high visibility makes the uncontrolled landings of helicopters inappropriate in areas of high use. Uncontrolled landings will lead to further conflicts.

It appears that the consensus of all parties involved point to the need for tight controls over these activities to minimize its impact on and preserve the beauty of the Na Pali Coast. The recommendations of my staff are as follows:

- 1) Approve helicopter landings at sites deemed appropriate by the responsible State agency with specific reference to the number of landings and people. Lengths of stays should be clearly specified to prevent over-use of the respective sites.
- 2) Resolve the issue of conflict with intended use. If Polihale and the Kokee Lodge area are approved for landings, locate the landing sites so as to minimize its impact on the other uses. So as to minimize future conflicts, define the parameters of use for these areas.
- 3) If landings and/or beachdrops are approved, require that each company make their helicopters identifiable, i.e. painting the bottoms of the helicopters with a certain color or insignia. This would make enforcement somewhat easier.
- 4) Approve sites with due consideration to the need for preserving heiaus and other resources that have significant historical and cultural value.
- 5) The FAA has no minimum altitude requirements for helicopter flights. Set specific altitude requirements to provide for the safety and welfare of both the passengers in the helicopters and the people below.
- 6) The strict enforcement of all conditions upon which approval for landings is granted is important. The use of an adequate number of park rangers who have the authority to issue citations can effectively control the use of the subject area. Facilities to monitor and coordinate the use of the Kalalau area may be established at the entrance at Haena.

The strict and proper control of use of these areas will reduce the potential of future conflicts.
- 7) Costs to maintain the Na Pali Coast is significant. Landing fees for the helicopters and other commercial vehicles and camper and hiker fees can be set to defray the expenses for maintenance of the Coast.
- 8) Exceptions can be made for the landing of helicopters performing essential services, i.e. rescue, cleanup and carrying government employees on official business.

Thank you for providing me with this opportunity to submit my

views and concerns.

Sincerely yours,

James N. Kurita
JAMES N. KURITA
Director

Rec 10/16/78

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

W. Y. THOMPSON, CHAIRMAN
BOARD OF LAND & NATURAL RESOURCES

EDGAR A. HAMASU
DEPUTY TO THE CHAIRMAN

DIVISIONS:
CONVEYANCES
FISH AND GAME
FORESTRY
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

October 11, 1978

Mr. James N. Kurita, Director
County of Kauai
Office of Economic Development
4396 Rice Street
Lihue, Kauai, HI 96766

Dear Mr. Kurita:

Thank you for commenting on the EIS Preparation Notice
for the Helicopter Landings on the Na Pali Coast.

Rest assured, your comments will be taken into
consideration in both the EIS and Conservation District
Use Application prior to any positive action on behalf
of the Land Board.

Very truly yours,

W. Y. Thompson
W. Y. THOMPSON
Chairman of the Board

Enc.

cc: Mr. Fred Proby - VTN



GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



DIVISIONS
CONVEYANCES
FISH AND GAME
FORESTRY
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY
1179 PUNCHBOWL STREET
HONOLULU, HAWAII 96813

October 31, 1978

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

Dear Mr. Proby:

Thank you for the opportunity to review your EIS Preparation Notice for Helicopter Landings on the Na Pali Coast.

We have in the past been managing our Forest Reserve transportation system, including helicopters, with the thought that it was an acceptable Conservation District use. We therefore felt that specific controls within forest reserve areas were our Division's responsibility in carrying out our Department of Land and Natural Resources Division of Forestry Regulation 1.

Prior to July 1976, when our regulation was revised, we did not have specific forestry regulation controls on helicopters. After the regulation revision, our Kauai District Forester began seeking information from the helicopter companies concerning their operations, current and planned. This included their notification of forest reserve areas where all recreation landings must cease. We were in the initial stages of working up a forest reserve helicopter use plan when the spotlight fell on the Na Pali, and conflicting ideas on setting transportation controls erupted. When the CDUA EIS approach surfaced, we backed off on moving to implement a Division of Forestry control system under our Regulation 1. We did, however, continue to have good compliance from the helicopter companies to acknowledge forest reserve areas we specified for no landings.

Because of the many interrelated uses of a forest reserve, I will certainly push to have and maintain a responsible role in the control of the entire forest reserve transportation system.

Perhaps the most effective way to comment on helicopter use at this point would be to briefly describe the type of control planning that we were working to achieve:

Mr. Fred Proby, Chief Environmental Scientist
October 31, 1978

-2-

Designation of helicopter landing sites:

I. Heliports - landing sites with road access

- A. Recreational use: these would be such locations as Kokee State Park and Polihale beach. (Since this designation would stimulate regular use, they should not be located in heavy use recreation sites such as in the play area in front of Kokee Lodge).
- B. Emergency Use: these are roadside Division of Forestry fire control use designated sites such as at Pua Lua reservoir. These are designated for fire control, rescue, and other management purposes only.

II. Helispots - landing sites without road access

- A. Recreation use: specifically designated sites that could be used for visitor rest and picture taking stops. Some of these sites may also be designated at times for day use picnic stops and/or camper drop off and pick up sites. Controls to consider in this category include: (1) time of day limitations, (2) use number limitations, (3) time of year or season of allowable use limitations, and (4) specifications of use allowable and when by specific site.
- B. Emergency - forest management use: these are Division of Forestry maintained emergency landing sites designated for rescue purposes. They can also be used for management purposes including research activity and fire control but not for recreational stops unless some are specifically approved for that purpose. They are maintained.
- C. Emergency - not designated: these are landing sites that may be natural openings or clearings opened up for a specific purpose such as fire control, rescue, a special work project, or for an emergency landing purpose. They are not permanent or kept as a recorded site, so they are not maintained.

Regulation of helicopter use has no cut and dry solution but controls must be designed to meet changing conditions. For example, our Kauai District Forester has issued restrictions to Kauai helicopter enterprises that no recreationist landings are allowed: in the Waimea Canyon and tributary canyon bottoms; in the Alakai Wilderness Preserve; nor within the forest reserve portion of the Na Pali between and including Hanakapiai and Hanakoa. To control use, we have also had to revise even foot travel activity such as by cutting back of length of stay and discouraging large group outings in some of our back country. We will need to perpetually monitor and revise all types of controls to keep our back country really back country.

Mr. Fred Proby, Chief Environmental Scientist
October 31, 1978

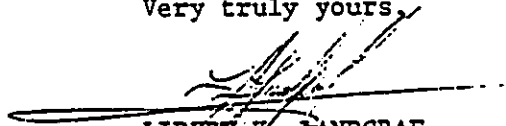
-3-

At the present time we have been allowing helicopter camper drop off landings in some remote Na Pali forest reserve areas such as Honopu mauka, Nualolo aina, and Awaawapuhi, which are inaccessible by land, but only if the individuals have Division of Forestry issued permits. We restrict the camp out period to two nights. We do not propose to allow any camp out drop offs by other than Division of Forestry issued permits.

Looking not too far ahead, I can only visualize that helicopter landings for recreationist camper drop offs in most public recreation areas will have to be phased out and that scenic helicopter flights along yet to be designated flight lines will still be a major attraction and business on Kauai. There is also privately owned forest reserve lands on Kauai that could provide opportunities for developed recreation landings.

In management of the helispot-heliport system outlined previously, we would specify that all unauthorized forest reserve landings--for any purpose--be logged and reported to the Division of Forestry. Our controls would extend to non-commercial as well as commercial craft as allowed for in our Forest Reserve Regulation 1, section 2.11 (copy attached).

Very truly yours,



LIBERT K. LANDGRAF
STATE FORESTER

attachment (Forestry Reg 1)

cc: Planning Office
Kauai District

APPENDIX B COMMENTS AND RESPONSES TO THE EIS

<u>EIS Mailing List</u>	<u>Comment Date</u>
A. <u>FEDERAL GOVERNMENT</u>	
U. S. Air Force - 15th Air Base Wing	11/8/78 NR **
U. S. Army D.A.F.E.	No Comment
U. S. Army Engineer District, Honolulu	10/19/78
U. S. Army Support Command	10/20/78 NR
U. S. Coast Guard	No Comment
USDI Fish and Wildlife Service	No Comment
U. S. Navy	No Comment
USDA Soil Conservation Service	10/13/78 NR
B. <u>STATE OF HAWAII</u>	
Dept. of Accounting and General Services	10/19/78 NR
Dept. of Agriculture	11/3/78 NR
Dept. of Health	11/2/78
Dept. of Land and Natural Resources	
Division of Fish and Game	No Comment
Division of Forestry	No Comment
Division of State Parks	No Comment
Historic Preservation Officer	No Comment
Dept. of Planning and Economic Development	No Comment
Dept. of Social Services and Housing	No Comment
Dept. of Transportation	11/3/78
Office of Environmental Quality Control	11/3/78
University of Hawaii	No Comment
Water Resources Research Center	11/3/78
Environmental Center	11/9/78
C. <u>COUNTY OF KAUAI</u>	
The Hon. Eduardo Malapit, Mayor	No Comment
Dept. of Economic Development	No Comment
Dept. of Public Works	No Comment
Dept. of Water Supply	No Comment
Planning Department	No Comment

** NR - No Response Required

APPENDIX B (Continued)

	<u>Comment Date</u>
D. <u>OTHERS</u>	
Hanalei Community Association	No Comment
Kauai Community Research Group	No Comment
The Kauai Outdoor Circle	No Comment
Shoreline Protection Alliance	No Comment
David Boynton	(undated)
Life of the Land	11/1/78
Keola Childs	No Comment
Roy Yee	No Comment
Dana Peterson	11/6/78
Edwin T. Sakoda	No Comment
Sierra Club, Hawaii Chapter	No Comment
Evan C. Evans III	No Comment
John E. Moriyama	No Comment
Lennie Lee	No Comment
American Lung Association	11/6/78
Helen C. Hopkins	11/5/78
Teresa S. Tico	11/7/78

The deadline for comments was November 7, 1978 (as published in the EQC Bulletin). Comments received at VTN Pacific after November 10 are not included in this Revised EIS. However, letters received after this date (up to November 22) will be answered, with copies sent to the OEQC and the DLNR.

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 15TH AIR BASE WING (PACAF)
HICKAM AIR FORCE BASE, HAWAII 96853



7 NOV 1978

REPLY TO: DEEV (Mr. Nakashima, 449-1831)

SUBJECT: Environmental Impact Statement (EIS) for Helicopter Landings on the Na Pali Coast, Na Pali Coast, Island of Kauai, Hawaii

TO: Department of Land and Natural Resources
1151 Punchbowl Street
Honolulu, Hawaii 96813

1. This office has reviewed the subject EIS and has no comment to render relative to the proposed project.
2. We greatly appreciate your cooperative efforts in keeping the Air Force apprised of your project and thank you for the opportunity to review the document.

Original signed by

THOMAS L. HEDGE, Colonel, USAF
Director of Civil Engineering

Cy to: Papillon Helicopters, Ltd
and Kenai Air Hawaii
VTN Pacific Inc.
1164 Bishop St., Suite 906
Honolulu, Hawaii, 96813

COPY FOR: Papillon Helicopters, Ltd and Kenai Air Hawaii



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

8895
 W

PODED-DEPT. OF LAND
 & NATURAL RESOURCES
 STATE OF HAWAII

19 October 1978

OCT 25 1978

Mr. W. Y. Thompson
 Department of Land and Natural
 Resources
 State of Hawaii
 1151 Punchbowl Street
 Honolulu, HI 96813

Rec'd Plng. Ofc _____
 By W. J. G. _____
 Gordon _____ Estelle _____
 Aki _____ Post _____
 Roger Library _____
 Len _____
 File in KA-1034 & KA-1060
 Return to _____

Dear Mr. Thompson:

We have reviewed the Environmental Impact Statement for Helicopter Landings on the Na Pali Coast, Kauai, Hawaii, which was forwarded to us by the Office of Environmental Quality Control on 12 October 1978. The activity does not affect any on-going US Army Corps of Engineers projects or studies and other areas of jurisdiction. Our comments and items of interest which may be helpful in considering the Conservation District Use permit application are attached for your information (Incl 1).

We thank you for the opportunity of participating in the environmental review process.

Sincerely yours,

[Signature]
 KISUK CHEUNG
 Chief, Engineering Division

1 Incl
 As stated

CF: (w/o incl)
 Office of Environmental Quality Control
 State of Hawaii
 550 Halekauwila Street, Rm 301
 Honolulu, HI 96813

Comments on the Helicopter Landings on the Na Pali Coast

1. The helicopters offer the opportunity to experience Hawaiian wilderness to those who cannot hike the trails into the Na Pali area. At the same time, the frequency and duration of helicopter noise over the quiet valleys detracts from the wilderness experience of others. It appears that some agreements or constraints on use of the air space and public lands should be developed. The following examples are suggested:

a. The number of landing areas could be limited in order to minimize noise in other valleys. Similarly, the times of operation over the Na Pali area could be regulated.

b. Emergency helicopter service and maintenance services could be provided by the helicopter companies which would also benefit park operations and maintenance.

2. Does the helicopter transportation system contribute significantly to the total visitor use of the Na Pali lands? Boat landings also produce noise impacts and may be more difficult to monitor. Commercial helicopter services should be regulated to the same extent as commercial boat operators.

Incl 1



Engineers • Architects • Planners

November 8, 1978

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

Department of the Army
U.S. Army Corps of Engineers
Building 230
Fort Shafter, Hawaii 96858

Subject: Comments on the EIS for
Helicopter Landings on the
Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Cheung:

Thank you for your review of the subject EIS. You can be assured that your comments will be considered by the DLNR in the formulation of a master plan for the Na Pali Coast. Specific responses to your comments follow:

1. The helicopter firms have submitted voluntary regulations (See Chapter V), which should substantially reduce present conflicts.
2. The helicopter flight logs show that roughly 11.5% of the campers at Kalalau Beach are brought in by helicopter. It has been our observation that the boats are barely audible above the noise of the surf.

Sincerely,


Fred Proby
Chief Environmental Scientist

FP:db

AFZV-EH-EE

OCT 20 1978

Office of the Governor
State of Hawaii
Environmental Quality Commission
550 Halekaunila Street, Room 301
Honolulu, Hawaii 96813

Gentlemen:

Reference is made to your letter dated 11 October 1978, regarding the Environmental Impact Statement (EIS) for Helicopter Landings on the Na Pali Coast, Island of Kauai.

The US Army Support Command, Hawaii, has no installations on the Island of Kauai at the present time and has no comments on subject EIS.

The opportunity to review the EIS is appreciated. The document is returned in accordance with your request.

Sincerely,

Original signed by JOHN E. PEARSON, JR
LTC, CE

CARL P. RODOLPH
Colonel, CE
Director of Engineering and Housing

1 Incl
As stated

Copies furnished (no incl)
Department of Land
& Natural Resources
1151 Punchbowl Street
Honolulu, Hawaii 96813

✓ Papillon Helicopters, Ltd.
and Kanai Air Hawaii
VIM Pacific Inc.
1164 Bishop Street, Suite 906
Honolulu, Hawaii 96813

B-7

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

P. O. Box 50004, Honolulu, HI 96850

October 13, 1978

Mr. W. Y. Thompson
Chairman, Board of Land
and Natural Resources
P. O. Box 621
Honolulu, HI 96809

Mr. Fred L. Proby
VTN Pacific Inc.
1164 Bishop, Suite 906
Honolulu, HI 96813

Gentlemen:

Subject: Helicopter Landings on the Na Pali Coast, Kauai, Hawaii

We have reviewed the subject environmental impact statement and have no comments to offer.

Thank you for the opportunity to review this document.

Sincerely,


Jack P. Kanalz
State Conservationist

cc: Environmental Quality Commission
550 Halekaiwila St., Room 301
Honolulu, HI 96813



GEORGE R. ARIYOSHI
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P. O. BOX 119, HONOLULU, HAWAII 96810

HIDEO MURAKAMI
COMPTROLLER

MIKE N. TOKUNAGA
DEPUTY COMPTROLLER

LETTER NO. (P) 2259.8

OCT 19 1978

Papillon Helicopters, Ltd. and
Kenai Air Hawaii
c/o VTN Pacific Inc.
1164 Bishop Street, Suite 906
Honolulu, Hawaii 96813

Gentlemen:

Subject: EIS for Helicopter Landings on the
Na Pali Coast, Island of Kauai

We have reviewed the proposed action and have determined
that it will not have any adverse effects on any existing or
planned facilities serviced by our department.

Thank you for this opportunity to comment.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Hideo Murakami".

HIDEO MURAKAMI
State Comptroller

GEORGE R. ARIYOSHI
GOVERNOR



JOHN FARIAS, JR.
CHAIRMAN, BOARD OF AGRICULTURE

YUKIO KITAGAWA
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII
DEPARTMENT OF AGRICULTURE
1428 SO. KING STREET
HONOLULU, HAWAII 96814

November 3, 1973

MEMORANDUM

To: Department of Land and Natural Resources
Subject: EIS for Helicopter Landings on the Na Pali Coast

The Department of Agriculture has reviewed the subject Environmental Impact Statement and has no comments to offer.

We appreciate the opportunity to comment. The report is herewith returned.

JOHN FARIAS, JR.
Chairman, Board of Agriculture

cc: Papillon Helicopters, Ltd. and Kenai Air Hawaii ✓

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



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

November 2, 1978

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: EPHS - SS

MEMORANDUM

To: Mr. Fred L. Proby, Chief Environmental Scientist
VTN Pacific, Inc.

From: Deputy Director for Environmental Health

Subject: Environmental Impact Statement (EIS) for Helicopter Landings on
the Na Pali Coast of Kauai

At this time, the Department of Health remains strongly opposed to the approval of helicopter landings at various sites along the Na Pali Coast for dropping off and picking up campers and picnickers because of the general lack of potable water and inadequate management of sewage, solid waste and litter disposal in the subject area. Until adequate management, facilities and monitoring staff are provided to accommodate the additional influx of visitors to the Na Pali Coast, we disapprove of any action that would lead to increasing numbers of campers and picnickers.

We are not opposed to helicopter landings for maintenance work and emergency landings for rescue and evacuation.

for *Benjamin H. Yuen*

JAMES S. KUMAGAI, Ph.D.

cc: Office of Environmental Quality Control
Dept. of Land & Natural Resources



Engineers • Architects • Planners Surveyors - Environmentalists

November 8, 1978

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

Dr. James S. Kumagai
Deputy Director for Environmental Health
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Subject: Comments on the EIS for Helicopter
Landings on the Na Pali Coast, Kauai,
Hawaii

JN 18-103

Dear Dr. Kumagai:

Thank you for your review of the subject EIS. Your comment recommending disapproval can only be dealt with by the Board of Land and Natural Resources. However, we would like to point out that allowing the existing helicopters to continue their operations while the master plan is being developed would not cause an increase in the present level of use. The helicopter operators have submitted voluntary regulations which should be adequate to control their activities during this interim period.

Sincerely,

Fred L. Proby
Chief Environmental Scientist

FP:sb

November 3, 1978

9685
STP 8.5156

Mr. Donald Bremner
Chairman
Environmental Quality Commission
550 Halekauwila St., Room 301
Honolulu, Hawaii 96813

Dear Mr. Bremner:

Subject: EIS for Helicopter Landings on
the Na Pali Coast, Island of Kauai

Thank you very much for giving us the opportunity to
review and comment on the above-captioned document.

While we have no substantive comments on the EIS, we
wish to advise both the accepting and proposing parties that
each landing site must be evaluated from a safety standpoint
prior to licensing by the Department of Transportation (DOT)
and that landings with revenue passengers at sites not
licensed by the DOT are in violation of the DOT Regulations
relating to airport site approval, airport licensing, and
airport license renewal, a misdemeanor under the Regulations.

Very truly yours,

R. Higashionna
R. Higashionna

ALK:jk

cc: DLNR
Papillon Helicopters, Ltd.
Kenai Air Hawaii
VTN Pacific, Inc.



Engineers • Architects • Planners

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

November 10, 1978

R. Higashionna
Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813

Subject: Comments on EIS for Helicopter Landings
on the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Dr. Higashionna:

Thank you for your letter of November 3rd. We acknowledge that the Department of Transportation Regulations prohibit landing revenue passengers at sites not licensed by the DOT and that violations constitute misdemeanors under these regulations.

Yours sincerely,

Fred Proby
Chief Environmental Scientist

FP:db

GEORGE R. ARIYOSHI
GOVERNOR



RICHARD L. O'CONNELL
DIRECTOR
TELEPHONE NO.
548-6915

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
OFFICE OF THE GOVERNOR
550 HALEKAUWILA ST.
ROOM 301
HONOLULU, HAWAII 96813

November 3, 1978

MEMORANDUM

TO: William Thompson, Chairman
Board of Land and Natural Resources

FROM: Richard L. O'Connell, Director *R. O'Connell*
Office of Environmental Quality Control

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT FOR HELICOPTER
LANDINGS ON THE NA PALI COAST, KAUAI

We have reviewed the subject document and offer the following comments for your consideration.

1. We are aware that a master plan for the Na Pali Coast is being developed. Action on the proposed project, therefore, seems premature. Serious consideration should be given to postponing this action until the master plan, of which it is a part, is completed.

2. Page ii

The EIS states,

"The applicants are requesting permission to land helicopters at the following sites on the Na Pali Coast and vicinity: Kalalau Beach, Honopu Beach, Kokee Lodge, Awaawapuhi Valley, Nualolo Aina Valley, Nualolo Kai Beach, Milolii Beach and Polihale Beach."

Page 3 states,

"Sites that have previously been designated as heliports, but are presently closed to public use, are Honopu Beach, Nualolo Aina Valley and Nualolo Kai Beach."

Mr. William Thompson, Chairman
Page 2
November 3, 1978

It is not clear whether the three proposed landing sites that are closed to the public can be made available to the applicants.

3. The EIS indicates that Honopu, Awaawapuhi, and Nualolo Aina are administered by the Division of Forestry. Since the Na Pali Coast master plan will not include areas administered by the Forestry Division, what controls will be exercised for the helicopter landings? Will drop-offs be permitted in these areas? Are permits required for the visitors there? An expanded discussion is needed.
4. Archaeological sites should be identified and located on maps in order to fully analyze the impact of the proposed action.
5. Pages 40-43

Other alternatives should be considered such as limiting the landings to established state parks and maintaining management controls through a contractual agreement with a single concessionaire selected by a bidding process.

We thank you for the opportunity to review the EIS.
We look forward to the revised EIS.

cc: VTN Pacific



Engineers • Architects • Planners - Surveyors - Environmentalists

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

November 8, 1978

Mr. Richard O'Connell, Director
Office of Environmental-Quality Control
State of Hawaii
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Subject: Comments on the EIS for Helicopter
Landings on the Na Pali Coast, Kauai,
Hawaii

JN 18-103

Dear Mr. O'Connell:

We are writing on behalf of our clients, Papillon Helicopters and Kenai Air Hawaii, in response to your comments on the Subject Environmental Impact Statement. Our responses follow the outline of your November 3, 1978 letter:

1. Postponing action until the master plan is adopted is discussed on page 49 of the Revised EIS. It should be understood that approval of the CDUA's need not give the helicopter firms unlimited freedom. Both firms have submitted voluntary regulations to the Board (page 0), and will continue to cooperate in the development of the master plan.
2. The State can request heliport designation of any site, as long as it meets the FAA's safety requirements. Helicopters can safely land at these sites, so official designation should pose no problem, once the decision is made to permit the use.
3. Honopu, Awaawapuhi and Nualulu Aina are presently under the Division of Forestry jurisdiction, but the master plan being prepared by the Division of State Parks recommends that all areas subject to recreational use be administered by Parks. Even if this does not occur, it is likely that the two Divisions will adopt similar rules. Furthermore, the voluntary regulations proposed by the helicopter firms are for the entire Na Pali Coast, regardless of jurisdiction. Drop off and camping are permitted uses in these valleys, providing the camper has a permit from the Division of Forestry.

Mr. Richard O'Connell

-2-

November 8, 1978

4. Archaeological Sites in the vicinity of the landing sites (100 foot radius) have been added to the location maps (Figures 2 - 6), and the discussions of these sites and the potential impacts of helicopter landings have been expanded to pages 20 and 34.

5. Limiting the sites at which helicopters can land is discussed as the "Restricted Landings" alternative on page 40 of the Revised EIS. This discussion is centered on the difference between landings at sites accessible by trail versus those that are not. The State Parks are managed for heavier use than the other areas, and this will be taken into account if quotas for landings are included in the master plan.

6. An option that the State could follow, but it would not substantially differ from the "Restricted Landings" alternative, except in the financial arrangements. Papillon Helicopters now make the majority of drop offs and pick ups since they are based closer to the Na Pali Coast. A concession would theoretically make the operators more accountable, but the need for this is questionable, since Papillon and Kenai have offered voluntary regulations.

Sincerely,



Fred L. Proby
Chief Environmental Scientist

FP:sb
cc: DLNR



University of Hawaii at Manoa

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

Office of the Director

November 9, 1978

RE:0265

Department of Land
and Natural Resources
1151 Punchbowl Street
Honolulu, Hawaii 96813

Dear Sir:

Review of Draft EIS Helicopter Landings on the Na Pali Coast

The above cited EIS has been reviewed with the assistance of P. Bion Griffin, Archaeology; E. Alison Kay, General Science; Jacquelin Miller and Margarer Kimmerer, Environmental Center.

We are pleased to note that the EIS addresses most of the major impacts which can be expected from this action. Because this area is one of the unique wildland resources in Hawaii, and one which deserves to be protected, we commend the fair and comprehensive assessment of impacts of the proposed action.

Summary of requested landing sites, p. 4

The table includes Awaawapuhi Valley which is not listed on page 3, does not appear on the map on page 5 and is not included in the descriptions of the individual landing sites. Is permission being requested to land in Awaawapuhi Valley?

Water resources and hazards, p. 17

"The water quality of many of the streams is very poor by public health standards..." This statement is inconsistent with that which appears on page 19, "The streams of the Na Pali Coast are the most pristine on the island." We suggest rewording this last statement in view of the water quality evidence presented in the EIS.

History and archaeology, p. 20, 34, 38

The EIS recognizes the vast riches of archaeological remains on the Na Pali Coast and the need to protect these valuable resources. We are extremely concerned about

B-19

AN EQUAL OPPORTUNITY EMPLOYER

November 9, 1978

increased accessibility and the potential destruction of these remains. Apparently many cave shelters accessible only by helicopters have been torn up by artifact seekers and several archaeological sites are being destroyed by looters, by campers building latrines, garbage pits and camp sites. Helicopters have extended the range of these campers into the valleys not reachable by foot and difficult to reach by boat; helicopters are therefore directly involved with increased destruction of archaeological resources.

When was an archaeological survey last conducted? What sites have been recorded? Are future surveys scheduled? Perhaps a thorough survey of the entire area should be conducted. Selected landing sites should be limited to those areas which have been thoroughly surveyed by a qualified archeologist.

Mitigation measures include rangers regularly patrolling the sites which have been surveyed. It is virtually impossible, however, to have rangers patrolling Honopu and Awaawapuhi. In other words, for the surveyed sites no supervision is expected, hence destruction is likely. We recommend that sites not surveyed be placed off limits until the area has been thoroughly examined and that no dropoffs be made near archaeological sensitive areas.

The EIS does not address the very real problem of how the people brought into the valleys will be controlled. We assume helicopter personnel would be responsible for their passengers in the stop-off area, but how will remote archaeological sites be protected from potential destruction by hikers and campers?

Further, because of the rich archaeological remains at Nualolo Aina Ridge, we suggest that access be prohibited unless specifically approved by a qualified archaeologist.

Relocation of landing pads, p. 42

If relocation of any of the heliports is necessary in accordance with the management plan, or to mitigate the impacts of helicopters to users, we suggest that a thorough biological and archaeological survey be conducted prior to any ground clearing for new heliport sites.

We are pleased to see the emphasis in this EIS on coordinating activities with the Na Pali State Park Management Plan. We particularly support the recommendations presented in Chapter VII of the EIS regarding limited landing sites, camper drop-offs, hours of operation and the issuance of limited permits to operate until final regulations can be adopted.

Yours very truly,



Doak C. Cox
Director

DCC/ck

cc: VTN Pacific
OEQC
P. Bion Griffin
Jacquelin Miller
Margaret Kimmerer

B-20



Engineers • Architects • Planners

November 10, 1978

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

Dr. Doak C. Cox, Director
Environmental Center
University of Hawaii
Crawford 317
2550 Campus Road
Honolulu, Hawaii 96822

Subject: Comments on EIS for Helicopter Landings
on the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Dr. Cox:

We appreciate your evaluation of our report as fair and comprehensive.
We offer the following responses to your comments:

Summary of Requested Landing Sites, Page 4.

Awaawapuhi was not listed as a requested landing site in the applicants' CDUA's. The summary on page 4 has been changed to "potential" landing sites, and Awaawapuhi has been added to Figure 1.

Water Resources and Hazards, Page 17.

The quality of the streams in Na Pali is indeed poor from a public health standpoint. The statement (under Biological Resources) that "The streams of the Na Pali Coast are the most pristine on the island", refers to the aquatic faunal communities found in these streams, not to their water quality.

Dr. Cox

-2-

November 10, 1978

History and Archaeology, Pages 20, 34, 38.


The revised EIS contains an expanded discussion of the archaeological sites found in the vicinity of the requested landing sites. A comprehensive archaeological survey of the area was last conducted in 1931, although more recent surveys (of a less comprehensive nature) have taken place. The Management Plan for the Na Pali Coast plans great emphasis in the preservation of archaeological resources, and specific measures to preserve such resources will undoubtedly be undertaken with the implementation of this plan.

Control of persons brought into the Na Pali Coast is definitely a management problem. The Division of State Parks is considering various levels of supervision. A partial solution proposed in the helicopter firm's voluntary regulations (See Chapter V) is to limit the number of people landed at any given site. The helicopter firms have proposed a limit of 24 people, but specific numbers can be worked out for each site depending on the fragility of resources found there.

Relocation of Landing Pads, Page 42.

Relocation of landing pads will be coordinated with all appropriate agencies to insure minimum disturbance to the sites.

Yours sincerely,



Fred Proby
Chief Environmental Scientist

FP:db

B-22

V.

UNIVERSITY OF HAWAII

Water Resources Research Center

November 3, 1978

Office of Environmental Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Sir:

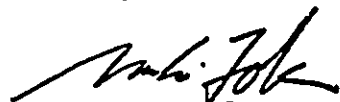
SUBJECT: Review of EIS for Helicopter Landings on the
NaPali Coast

Thank you for sending the subject EIS for our review. We have the following comments for your consideration:

In reference to Section B-Secondary Impacts Health and Sanitation pg. 34, it is doubtful that the stream water quality can be alleviated by providing adequate sanitation facilities. Sanitation facilities can only be easily constructed at the beach camping areas near the landing sites. However, the pollution of streams by feral goats and hikers can occur anywhere along the watershed where sanitation facilities for hikers are not accessible. Water contamination prevention can only be accomplished by restricted entry or proper disposal of waste material. The latter entails proper education of the public.

Flash floods and tsunami inundations may occur along the NaPali Coast and its valleys. Some preventive measures should be established to safeguard visitors (e.g., warning signs, demarcation of possible inundation zones on poster-maps and handouts to visitors would be desirable).

Sincerely,



Yu-Si Fok, Professor
Faculty EIS Review Coordinator

YF:jm

cc: Dept. of Land & Natural Resources
Papillon Helicopters Ltd. & Kenai Air Hawaii
H. Gee

B-23

2540 Dole Street • Honolulu, Hawaii 96822



Engineers • Architects • Planners

November 9, 1978

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

Prof. Yu-Si Fok
Faculty EIS Review Coordinator
Water Resources Research Center
University of Hawaii

Subject: Comments on the Environmental
Impact Statement for Helicopter
Landings on the Na Pali Coast

JN 18-103

Dear Prof. Fok:

Thank you for your letter of November 3rd. We agree that the most effective means of alleviating the water quality problems in the Na Pali Coast Streams is to restrict the number of hikers and to control the feral goat population. The State will be in a position to establish such controls once the forthcoming management plan for the area is put into effect.

According to the EIS Preparation Notice for the Na Pali Coast Master Plan, provisions will be included for warning visitors of areas susceptible to tsunami inundation or flash flooding.

Yours Sincerely,


Fred Proby
Chief Environmental Scientist

FP:db



Engineers • Architects • Planners

November 9, 1978

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

Prof. Yu-Si Fok
Faculty EIS Review Coordinator
Water Resources Research Center
University of Hawaii

Subject: Comments on the Environmental
Impact Statement for Helicopter
Landings on the Na Pali Coast

JN 18-103

Dear Prof. Fok:

Thank you for your letter of November 3rd. We agree that the most effective means of alleviating the water quality problems in the Na Pali Coast Streams is to restrict the number of hikers and to control the feral goat population. The State will be in a position to establish such controls once the forthcoming management plan for the area is put into effect.

According to the EIS Preparation Notice for the Na Pali Coast Master Plan, provisions will be included for warning visitors of areas susceptible to tsunami inundation or flash flooding.

Yours Sincerely,

Fred Proby
Chief Environmental Scientist

FP:db

Received 11/6/78 JTN

FROM: DAVID BOYNTON
BOX 651 Waimea Hi. 96796

VTN Pacific

Dear People:

I have read over the E.I.S. for helicopter landings on the Na Pali Coast, and have the following comments to make concerning what I have read; these are arranged on a page by page basis...

- 1) Pg. 2 - Kenai Helicopters will not be significantly affected by a policy of prohibiting visitor dropoffs on the Napali Coast, since only five % of their business comes from shuttle service. It is doubtful that even a total cessation of landings on Na Pali Coast would impact their business, since it is unlikely that tourists would be deterred from utilizing the scenic tours by the fact that they couldn't stretch their legs for five minutes during a one hour flight.
- 2) Pg. 4 - (also pgs. 8 and 13) - The chart on pg. 4 indicates that Honopu and Nualolo Aina are inaccessible from the beach. This is not true - both valleys are accessible from the beach.
- 3) Pg. 8 - Milolii Beach has no land access - This is not entirely true, since the Beach can be reached by hiking the four miles from Polihale, though a short swim is necessary. This is not very difficult during the relatively calm summer months.
- 4) Pg. 14 - Portions of the Na Pali Coast may be viewed from "Kokee (Kalalau Lookout)..." and also from the end of Milolii Road, and from the ends of Nualolo, Awaawapuhi, and Honopu trails, which offer terrific views, and which are maintained by DLNR work crews.
- 5) Also, the statement that "there is presently one commercial operator landing picnickers and campers at Kalalau" is not true - one legal operator, but more than one illegal operator.
- 6) Pg. 16 - "... the majority of passengers are our of state visitors"; I'm sure this is true, but it conflicts with Red Johnsons testimony before the DLNR that most of the passengers are local people.

- 7) Pg. 18 - Canavalia is also found at Milolii, next to the heliau, though I am not sure what species it is.
- 8) Pg. 19 - "Endangered or threatened species of wildlife that may frequent the Na Pali Coast" should include the Harcourt's (Hawaiian) storm petrel. This endangered species is thought to nest only on Kauai, probably along the Na Pali Coast, though eggs and nests have never been found. The helicopters and zodiacs may represent a real threat to the continued existence of this seabird species, especially if it were found to nest only in a very localized area.
- 9) As to green sea turtles, though I have never seen one ashore on Kauai, I did see one within a few feet of shore this past April... in Milolii.
- 10) Pg. 22 - "The helicopter landings may, however, detract from the "wilderness experience"..." - change "may" to do... they do detract.
- 11) Pg. 26 - "Milolii is inaccessible except by boat and helicopter." False - A hike and short swim make Milolii accessible from Poihala.
- 12) Pg. 28 - Helicopters alone accounted for 1,175 visitor days. For the same period of time, the state estimated 781 visitor days on the basis of camping permits. This points to the inadequacy of the situation whereby the helicopter companies are allowed to issue camping permits. It also points to the inadequacy of data of human use of the Na Pali coast. There were obviously a great many more than 1,175 visitor days, since a large number of people visit Milolii by boat, and there are a few who hike in.
- 13) Pg. 29 - Noise levels of 74 dBA at 500 ft. elevation - according to my reference book, noise levels of 70 decibels is like being fifty feet away from freeway traffic. This is not my idea of a wilderness experience. I know from personal experience that the helicopters often fly at closer than 500 feet elevation above the surrounding terrain. When the terrain is in an enclosed valley or backed by cliffs, the noise factor should be even more pronounced.
- 14) I also question the accuracy of the readings - background levels of 45 dBA at Hanakoa and background noise of 63 dBA at Kalalau - why the tremendous difference?
- 15) Pg. 32-33 - The few inferences based on the statistics presented need further analysis. You mention noise levels of 75-90 dBA "occurring only briefly" when Helicopters approach the heads of waterfalls. Such noise levels are totally inappropriate and should definitely not be allowed in popular destination points such as waterfalls.
- 16) The section "e" says that 18-22 helicopter pass-bys would take place only rarely. In view of the tremendous increase in helicopter traffic during the past few years, more detailed projections of flight frequencies should be included. If the helicopter passenger data for the past four years were graphed and extrapolated as a reasonable estimate of future helicopter traffic, I think that 18-22 pass-bys per day would no longer be a rare occurrence. Furthermore, the fact that it happens during the period of peak usage of the Na Pali Coast by hikers and boaters adds to the conflict. To say that 6-10 fly-bys represents a typical day also ignores the likelihood of significant increases in helicopter usage in the near future.

17) Pg. 33 - cont. The cumulative noise level figures (9 to 33 minutes per day) tend to obscure the bothersome nature of the noise. If the helicopters would make their noise for fifteen minutes straight and then be gone for the rest of the day, those of us who enjoy a quiet wilderness would not be complaining so much. But its the repetitive interruption of quiet that is so bothersome.

18) Section "f": Noise levels in excess of 100 dBA fifty feet from the pad are comparable to the noise of a jackhammer. That is too much noise, especially for the narrow beaches at such places as Honopu and Mualolo Kai.

"The presence of the helicopter operations in the Na Pali Coast provides recreational opportunities to people that would normally not be able to see the Na Pali Coast by hiking the difficult trail to Kalalau. Helicopters are able to fly up the valleys and over the ridges, allowing passengers to view the scenic areas from perspectives that would be impossible to achieve by any other means." This paragraph, summing up the case for helicopter landings as a benefit to the useage of Na Pali Coast, is not entirely accurate. People do not have to hike the difficult trail to Kalalau - the Zodiac boat alternative should be mentioned.

Also, the CDUA permit that is being requested will not prohibit the activities mentioned in the second sentence of the paragraph...only landings are being applied for. Furthermore, the benefits of "rescues" and "Maintenance" need not be halted by a limitation of the landings.

19) Pg. 34 - "Water contamination" is a serious problem - a high priority item - that can be alleviated by limiting the number of campers at Na Pali...this reasonable alternative must also be considered (rather than just providing "adequate sanitation facilities..."). For the number of campers at Kalalau, adequate sanitation facilities might mean more development than would be appropriate for a wilderness area.

20) Pg. 36 - For those who need the security of helicopters when they are on a wilderness camping trip, may I suggest a campout in the pasture next to the Princeville Airport, where that reassuring hum can be heard throughout the day. Actually, even without regular landings along the Na Pali, the helicopters will be making regular fly-bys; therefore, this alternative should not make a difference in reducing the anxiety levels of this timid species of camper.

21) Pg. 38 - Supervision by park rangers of sites in areas such as Mualolo aina is not a reasonable mitigation measure. If anything, the people who are responsible for taking people into those areas should be responsible for guiding people through any sites visited, to ensure that there is no destruction to the sites. The Na Pali Zodiac E.I.S. included such a proposal. Also, to post off-limit signs is a ridiculous mitigation measure - guaranteed to attract the curious.

22) Pg. 40 - "...both companies have an established pattern of sightseeing tours and passenger drop-offs that would not change significantly in the near future." - Their pattern might not change, but their numbers are sure to. Make a graph of passenger figures for the past four years and extrapolate...let's see what might really happen in the future.

- 23) Pg. 40 - continued- "limiting landings to a few sites would also concentrate landings in a few areas, subjecting them to heavier use." This is not necessarily true - if the landings are indeed limited, this might result in even lower usage than at present.
- 24) Pg. 41 - A suggestion is made to limit the number of hikers on the trails, while continuing to allow helicopters to land campers. Hiking is so much a part of most peoples wilderness experience... if enough people are getting there by foot alone, then the more intrusive types of access should be restricted or halted. The trend in the National Parks, which have had valuable experience in carrying capacity problems, is to restrict mechanized travel as much as possible, in order to maintain the wilderness quality.
- The difficulty in acquiring emergency helicopter service will not be much increased, especially since there will be park rangers who presumably will have walkie talkie type communication equipment. For areas with no ranger, waving a blanket or jacket will likely be sufficient to attract the attention of one of the many passing helicopters that regularly cruise the Na Pali Coast.
- 25) Pg. 43 - "Increased numbers of campers entering by trail would endanger... archaeological resources of these areas." What areas are you talking about? Helicopter and zodiac introduced visitors are the major factor causing endangering of archaeological resources.
- 26) Again, the psychological security provided by helicopters presence along Na Pali is mentioned. If people are so insecure, then they should stick to the County Parks and State Parks where there are nearby telephones and highways. And furthermore, the helicopters are ever-present even if they don't have regular landing services.
- 27) The State will not have to contract for trash removal services - the Zodiac's represent an alternative trash removal method that should be mentioned. Also, with regular patrolling by park rangers it is likely that people can be made to dispose of more of their trash than at present.
- 28) "...permission for helicopter landings can be withdrawn in the future." This statement should be clearly understood, and be included as a part of any CDUA permit.
- 29) Pg. 47 - "Measures such as restricting helicopters from certain beaches, limiting the number and hours of landing and designating flight paths away from "Wilderness experience" areas would reduce the degree of intrusion. The helicopter firms have expressed a willingness to work out ways to modify their operations..." I fully support such a program, but think that the environmentalist groups who have voiced their concern over the helicopter problem should be included in the formulation of any agreement.
- 30) Pg. 49 - "A more equitable solution would be to "experiment" with different mitigating measures to determine, in the field, their effectiveness in reducing the intrusive element of helicopter operations." I support this plan, but again ask that representatives of environmental groups be allowed to participate in such experiments, so that a balanced experiment is conducted. Otherwise the experiment is likely to be biased in favor of the helicopter companies who will have an unequal opportunity to lobby for their views and desires.

- 31) A-31: "Furthermore, these tours would involve brief landings, a use that has been approved, since such landings were being made prior to the passage of Regulation 4 (requiring Conservation District Use Permits)."

This is debatable. Just because Jack Harter was grand-fathered in doesn't necessarily mean that everyone can be grand-fathered in. I feel that such landings would be under the jurisdiction of the DLNR for the Companies involved. This issue needs to be further analyzed.

- 32) Some falsehoods in Evan C. Evan's letter need clarification.
Pg. A-33: Safe entry into Milolii is available from the Polihale end of Na Pali Coast, with a four mile hike and a short swim.

- 33) To say that renting a boat is unsafe (as compared to Helicopters...) is questionable, in light of two recent helicopter crashes in the Waimea Canyon area. I have also witnessed a helicopter passenger get her hand cut up by the whirling of a helicopter blade. Perhaps the question should be phrased: Does the state incur some sort of liability by allowing unsafe methods of transportation (helicopter) into Na Pali?

- 34) "I...have not at any time witnessed the disturbance of seabirds, nesting or otherwise." He may not have, but I certainly have. I have watched from the Honopu ridge as a helicopter scared more than twenty white-tailed tropic birds from the cliffs and crevices where they nest between Honopu and Awaawapuhi.



Engineers • Architects • Planners

November 8, 1978

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

Mr. David Boynton
Box 651
Waimea, Hawaii 96796

Subject: Comments on the EIS for
Helicopter Landings on the
Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Boynton:

Thank you for your comment letter (undated and unsigned), received at our office on November 6, 1978. We offer the following responses to your comments:

- 1) No response required.
- 2) The chart on page 4 of the EIS will be changed to add the designation "difficult and hazardous access from beach" to Honopu and Nualolo Aina Valleys.
- 3) In our opinion, any access that requires swimming cannot be considered land access, nor can it be considered safe.
- 4) The cited paragraph will be expanded in the revised EIS to include the views that can be seen from Nualolo, Awaawapuhi and Honopu Trails and from Milolii Road.
- 5) The allegations of unauthorized commercial boat operations in the Na Pali Coast area will be mentioned in the Revised EIS.
- 6) There is no specific data on the origin of recreational users of the Na Pali Coast, whether arriving by means of the trail, by boats, or by helicopters. The context of Mr. Johnson's comments to the DLNR was

that users of Milolii and Nualolo Kai are primarily local people that do not frequent Kalalau due to the contrasting lifestyle of the majority of users of Kalalau Beach.

7) Thank you for this information.

8) John Sincock, an ornithologist with the USFWS on Kauai, expressed the opinion to us that helicopters do not adversely affect the bird life of the Na Pali Coast.

9) The text of the Revised EIS will be changed to reference your sighting of a green sea turtle.

10) There are many subjective definitions of "wilderness experience", and some people do not object to the presence of helicopters; the text has been revised to clarify this point.

11) The fact that Milolii can be reached by hiking and swimming from Polihale will be noted in the Revised EIS.

12) It is true that the total number of visitor days at Milolii during that period exceeded the estimated 1,175 visitor days resulting from helicopter passengers, as some people reach the area by private boat (and perhaps some do by hiking and swimming from Polihale). The figure of 1,175 might be an overestimate of helicopter passenger "visitor days" since an average stay of 2.5 days was assumed, while the average overnight camper may spend less time at Milolii. We agree that the State's system for keeping track of Na Pali visitors is inadequate.

The helicopter companies have voluntarily proposed a set of regulations whereby they will discontinue issuance of overnight camping permits on behalf of the State. In the future, only passengers holding valid permits issued by the State will be dropped off.

13) As pointed out on page 29 of the EIS, noise levels of 74 dBA were recorded when the helicopter was hovering 500 feet directly above the observer. Instances of helicopters hovering above a specific spot are quite brief, and therefore not comparable to the continuous noise effect of freeway traffic. In a valley, the walls actually absorb sound, and a helicopter passing overhead is quickly lost behind the ridge. We found that valleys have a shorter noise exposure than the open areas on the trail.

- 14) The reason for the higher background readings at Kalalau Beach is the sound of the surf. Readings were taken on a relatively calm day (2-3 foot swells); heavier surf would produce higher background noise levels.
- 15) Your views on noise levels are acknowledged. Our purpose in presenting this data was to provide a starting point for discussions on acceptable noise levels.
- 16) The regulations proposed by the helicopter companies establish the maximum total number of day users brought by helicopter to the Na Pali Coast, at 360 per month, with no more than 24 day users brought to a given site in a single day. This type of regulation will provide for control of growth in the use of the Na Pali Coast.
- 17) The text on page 33 of the Revised EIS (paragraph e) will be changed to reflect the impact of the repetitive interruption of quiet brought about by helicopter operations. Regulations proposed by the helicopter companies includes a limitation on the landings and takeoffs to 1-1/2 hour periods in the morning and afternoon.
- 18) Your concern about noise levels in excess of 100 dBA is noted. The paragraph concerning the "benefits from the helicopter operations" will be modified to reflect the boat tour alternative.
- 19) The text on page 34 of the Revised EIS will be changed to state that present facilities might be adequate if current levels of usage are reduced. This reduction would have to be achieved by denying access to some hikers as well as limiting helicopter and boat trips.
- 20) No response required.
- 21) We acknowledge your opinion that posting signs and supervision by park rangers are ^{not}entirely adequate mitigation measures. Personnel of the two helicopter companies will brief passengers on the fragility of the archaeological resources found in the area, and encourage them to protect these resources.
- 22) As mentioned in point 16, the helicopter companies are proposing to limit the number of dropoffs on the Na Pali Coast. Therefore, extrapolation from past trends is not warranted in this case.

Mr. David Boynton

-4-

November 8, 1978

23) If landings are limited to fewer areas than are now used, without reducing the total volume, the intensity of use would increase. However, the voluntary regulations do include limits on the number of people dropped off. The text has been clarified on this point.

24) No response required.

25) The Revised EIS will list archaeological sites within 1,000 feet of the proposed landing spots.

26) Your point of view is acknowledged.

27) The trash removal services provided by Na Pali Zodiac will be mentioned in the Revised EIS.

28) No response required.

29) The Division of State Parks is proceeding on their master plan for the Haena-Na Pali State Park, so you will have additional opportunities to be involved in the planning for the Na Pali Coast.

30) No response required.

31) It is not within the scope of the EIS to evaluate the legality of actions taken by the Board of Land and Natural Resources.

32)-34) Unfortunately, your letter arrived too late to allow us time to contact Dr. Evans for his reply.

Sincerely,


Fred Proby
Chief Environmentalist

FP:db

B-33

VTT.



November 1, 1978

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

Re: Comments to Environmental Impact
Statement for Helicopter Landings
on the Na Pali Coast, Kauai

Dear Mr. Proby:

There are two major defects with the entire EIS-CDUA process now being conducted by the DLNR. The first is reflected on page i: Jack Harter Helicopters, Inc. (hereinafter referred to as JHH) is not listed as one of the applicants of a Conservation District Use Permit (CDUP). The second is reflected on page 1: "Helicopter landings have been made by both firms on a regular basis in the past, and are continuing under temporary variance from the DLNR." (Emphasis supplied.) What reasoning allows such "temporary variance"?

The following comments to the environmental impact statement for Helicopter Landings on the Na Pali Coast of Kauai discuss these two major defects under Sections I and II, and under Sections III, IV, and V, the inadequacy of the EIS itself.

I. JHH Should Be Required To Apply For A CDUP And Therefore To Undergo The EIS Process.

Kenai Air Hawaii, Inc. and Papillon Helicopters, Ltd. (hereinafter referred to as the applicants) must go through a Conservation District Use Application (CDUA) process because they desire official permission to land helicopters on the beaches and ridges of the Na Pali Coast of Kauai on a regular basis (p.1). Restrictions which the DLNR decide to include with any permits it issues may address the reasons for which the applicants desire permission to land. Until such permits are issued, however, the legitimacy of such reasons is the subject of much disagreement. Whether one company lands to pick up litter or to drop off passengers or to rescue injured hikers or to allow its passengers to stretch their legs, should not be determinative of the question whether such company needs to file a CDUA.

Life of the Land
Page Two
Fred L. Proby
November 1, 1978

That JHH does not drop off or pick up passengers does not diminish the environmental impacts that the Conservation District incurs when JHH lands its helicopters there.

The only legitimate reason for not requiring JHH to seek CDUA approval could be that it has allegedly acquired some vested right in its operation. Someone has suggested that JHH has been "grandfathered" in under DLNR Conservation District Regulation No. 4. If this is DLNR's position they have yet to say so in answer to my direct inquiry (letter to Mr. Roger Evans, October 14, 1978); but see Mr. Proby's remark in his letter to Ms. Peterson, p. A-31, paragraph 7.

This grandfather clause idea carries no water. First, Regulation No. 4 went into effect in 1964. No mention is made that any of these helicopter companies have been in operation since before then. JHH was incorporated on December 22, 1975. The other companies have been in operation only since then. They have all been landing illegally and continue to do so.

Second, Regulation No. 4 does not contain a true grandfather clause. It defines "non-conforming use" in terms that provide for the continuation of existing uses of land. Grandfather clauses are traditionally written into statutes with an eye toward fairness to those who have lawfully and properly carried on an activity continuously and presumably with the necessary qualifications.

In the case of Conservation District uses, the clause would act in favor of those uses the discontinuation of which would create economic hardship for the proprietor because it would mean the razing of a structure or the cessation of a legitimate and publically desirable private business.

The definition of "non-conforming use" does not and should not act as a grandfather clause to the benefit of an operation which has been carried on illegally on public land. Before JHH is allowed to continue, it should be required to apply for a CDUP so that the environmental affects of its operations can be assessed by the public EIS review process. Any so-called vested rights which JHH may hold claim to cannot outweigh the need and the right for the public to review its operation as an impact on the environment.

Life of the Land
Page Three
Fred L. Proby
November 1, 1978

II. The Applicants Should Be Required To Cease And Desist Their Activities Until Completion Of The CDUA Process.

Much of what was said in Section I, above, applies to the applicants. Their activities have been undertaken in contravention of existing laws (CDUA process, common trespass, and environmental laws) and until such laws are fully complied with, their activities should be halted by order of the DLNR.

Whether any law or regulation specifically gives or denies the DLNR or other agency such discretion, allowing an action to continue while an EIS is being prepared flies in the face of the spirit of HRS Chapter 343, the language of the Environmental Quality Commission (EQC) EIS regulations, and everyday common sense.

For example, the definition of an EIS (HRS §343-1(6)) presupposes a "proposed" action and the language of §343-4 (Applicability and Requirements) is written in the future tense. It is disturbing when EIS's are required "after-the-fact". See, for example, EQC Bulletins of September 23, 1978, and October 8, 1978: "AFTER THE FACT CONSTRUCTION OF A PROTECTIVE WALL AT KAHALUU, OAHU."

Therefore, it is readily apparent that allowing the helicopters to continue while their permit process is pursued is helping to set a dangerous precedent.

III. The EIS, As Drafted, Does Not Adequately Address The Environmental Impacts of The Helicopter Tours.

1. Although VTN announced in its introduction that "a brief description of (the) operations (of JHH) will be given in order to evaluate cumulative impacts" (p. 1), cumulative impacts were not evaluated. As an example, Figure 7 does not include the number of passengers carried on sightseeing tours by JHH (p. 24). Since JHH schedules four flights daily (p. 12) Figure 7 is not a true graphic representation of passenger statistics, the first "primary impact" discussed (pp. 23 ff.).

2. "Secondary Impacts" are inadequately discussed. For instance, with regard to the disturbance of wildlife, no studies are cited. No ornithologists were consulted and no research is alleged to have been done. VTN believes it

Life of the Land
Page Four
Fred L. Proby
November 1, 1978

suffices to say, "There is no evidence...that the helicopters have any lasting adverse effect on the birds along the coast." What research has VTN done to warrant such cryptic conclusion?

To aggravate this matter, VTN says, at p. 49: "This EIS has been able to identify only one impact that might justify ...a moratorium (on helicopter landings until the Na Pali State Park Management Plan is completed), namely the perceived loss of wilderness quality by a portion of the people who use the Na Pali Coast." One reason VTN was unable to identify any other impacts was because they didn't try.

To continue with the example above regarding wildlife, no studies were made, consulted, or referenced concerning the affect on coastal birds caused by the intrusion of helicopters into their sensitive environment. See EQC EIS Regulations, Section 1:42, Content Requirements:

c ...Special emphasis shall be placed on environmental resources that are rare or unique to the region or the project site....it is essential that the sources of data used to identify, qualify or evaluate any and all environmental consequences be expressly noted.

e ...secondary effects...shall be thoroughly discussed to fully describe the probable impact of the proposed action on the environment...."

No ornithologist is cited, as such, under "References and Personal Contacts" (p. 51). Furthermore, sixty words (p. 35) is hardly a thorough discussion nor a full description of the probable impacts on the wildlife of the area. The references cited on p. 19 (J. Sincock and C. Lameriaux) were evidently consulted only for information regarding "Biological Resources" and not environmental impacts.

3. VTN makes a grave error when it considers 11.5% of Kalalau campers (p. 41) a "minor" contribution by the helicopters (p. 48). This 11.5% represents almost 2,000 "camper days" a year at Kalalau (p. 48) which by itself, I submit, would create significant impacts on the pristine environment of the Na Pali Coast.

IV. The EIS Fails To Convey And VTN Fails To Fully Comprehend The Value of Kauai's Wild Na Pali Coast And The Meaning Of The "Wilderness Experience".

Life of the Land
Page Five
Fred L. Proby
November 1, 1978

At the outset, I wish to refer to comments made by Ms. Dana Peterson, 20 September 1978, reproduced on Page A-28 of the EIS, and specifically to her comment number 2: (D)ifficulty of access is a very important component of a wilderness area."

Ms. Peterson adeptly describes the inherent differences between hiking, boating, and propelled flying. Seekers of the wilderness experience desire a certain harmony with nature, a quality of life deathly lacking in a society dependent on the internal combustion engine.

When a nature lover has hiked for several hours through lush forest or wild countryside, he or she seeks a quiet place to relax--a place where the wind rustles the tree leaves and long grasses, psychologically soothing tired muscles and enriching the soul. Birds might call back and forth across a clearing. A small animal (mammal, insect, reptile) unaware of human presence might venture into the open, tending to its very existence. The hiker is sensitized. In a moment of hushed silence, he or she absorbs the wonders of natural life and becomes much closer to a meaningful communion with the forces of creation.

Then comes the PAK-PAK-PAK-PAK-PAK of a helicopter. The noise lasts for at least a full minute and recurs two or three times an hour (p. 33). The birds fly away. The animals scamper in fear. The hiker's reverie is destroyed.

The helicopters carry tourists, some of whom are too old or too fat to earn a chance to experience such bliss. The wilderness experience is not for everyone. American society has exiled nature from its midst and Americans have gone incredibly soft with electric appliances, labor saving devices, internal combustion engines, et al. But then they want, in a moment of recreation, to see and know the very existence that they've exiled--to take part in a "wild" experience they have shunned in their everyday lives.

The hikers of Kalalau know, and the DLNR should recognize, that these helicopter tourists should not have access to such an experience when they only need to shell out some money.

In the EIS, VTN constantly refers to "the average citizen" (p. 22), those normally unable to see the Na Pali Coast by hiking (p. 33), and insecure campers who "may find the

Life of the Land
Page Six
Fred L. Proby
November 1, 1978

presence of motorized transportation comforting" (pp. 36, 42, 43). I submit that these security seeking creatures would do best to stay home, or at least in Lihue, and leave the wilderness wild, uncluttered, and quiet. Let those seeking a sense of community (p. 36) find it in their hotel rooms, or on an easily accessible public beach.

As Ms. Peterson noted in her comment number 5:

Helicopter presence is totally incompatible with wilderness character.... Motorized access destroys the feeling of remoteness from civilization and cheapens the experience of the self-propelled visitor.

V. Miscellaneous Comments.

1. Since the helicopters will tour the Coast no matter the outcome of this CDUA-EIS process, the emergency services will remain available for sick and injured hikers.

2. No mention is made of the cost that the State would incur by contracting for litter pickup, but to destroy a wilderness setting so the State can get free services is nonsensical.

3. The discouraged people who decide not to hike back but opt for a helicopter ride instead need only rest an extra day, and then hike back. They will be stronger for it--physically, mentally, morally--and so will our society.

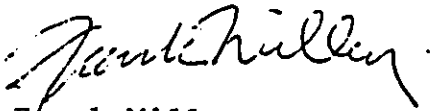
4. VTN should not consider the Na Pali Coast "primarily a recreation area" and denigrate archaeological and biological research to secondary uses (p. 15). The area has infinite value as a wilderness teeming with prime archaeological data and should be recognized as such. The DLNR should deny all permits until a management plan can be enacted.

5. The noise impact statistics lead to the conclusion that JHH's operations are just as disturbing as the others' and that the total disturbance is extreme (pp. 32-33, paragraphs (a)-(f)). Therefore, I wish to reiterate the grave precedent being set by (1) not requiring JHH to file a CDUA and (2) not ordering the applicants to cease and desist until this controversy is cleared up.

Life of the Land
Page Seven
Fred L. Proby
November 1, 1978

Thank you very much for reading my comments. I hope they will be seriously considered as a legitimate expression of deep concern.

Yours truly,



Frank Miller
Staff Attorney



Engineers • Architects • Planners

November 8, 1978

1164 Bishop Street
Suite 306
Honolulu, Hawaii 96813
(808) 521-5651

Mr. Frank Miller
Life of the Land
404 Piikoi Street
Honolulu, Hawaii 96814

Subject: Comments on the EIS for
Helicopter Landings on the
Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Mr. Miller:

Your comments on the subject EIS are appreciated, however, some of your comments do not relate to the EIS itself. It is not within the scope of an Environmental Impact Statement to evaluate the legality of the actions of the Board of Land and Natural Resources. You can be assured that your comments will come to the attention of the Board. The following are responses to your comments on the EIS.

I and II. Your comments regarding Jack Harter Helicopters, Inc. is a subject for the Board to resolve, as is the "cease and desist" issue. However, we would like to point out that the situation is not as clear-cut as other "after-the-fact" actions, since the State Department of Transportation has already licensed heliports ("quasi-public airports") at Kalalau, Milolii, Polihale and Kokee. Furthermore, State personnel frequently use the helicopters on official business, and the Divisions of Forestry and State Parks have informal arrangements with Papillon Helicopters to remove trash (eg. Forestry stacks trash bags at their Hanakoa Valley landing pad).

III. 1. We were not able to obtain specific data on Jack Harter Helicopters' passenger volumes, but the frequency of his flights was noted on page 12. We have added an extrapolated estimate of his Na Pali Coast Scenic tour passengers, to Figure 7.

III. 2. The conclusion on page 35, that the helicopters have no lasting effect on bird life should have cited John Sincock as the source of that opinion. Mr. Sincock is an ornithologist with the U. S. Fish and Wildlife Service on Kauai (as listed under personal contacts), and is respected as one of the foremost authorities on Newell's Shearwater. Mr. Sincock has spent many hours of observation on the Na Pali Coast, and though he has not published a report that deals with the effects of helicopters on the birds and other wildlife, he is certainly a credible source of information. Environmental impacts were discussed with Mr. Sincock and Dr. Lamoureux.

The sentence regarding the loss of wilderness quality being the only impact that would justify a moratorium has been clarified. We have identified other impacts (See Chapter IV), but the wilderness quality impact appears to be the most controversial.

III. 3. The term "minor" means lesser in size, amount, importance, etc., and 11.5% is unquestionably the lesser proportion of users at Kalalau Beach. We do not imply that this is "insignificant", but we do feel that an 11.5% reduction in the number of campers would not greatly change the existing situation.

IV. A present, the Na Pali Coast is visited by a variety of users seeking different types of experience. We recognize that some uses of the area conflict with other uses. Specifically, the use of the Na Pali Coast by visitors traveling by helicopter, conflicts with the use of the area by visitors seeking the wilderness experience. As stated in the EIS, "Helicopter noise and visual intrusions often constitute an unacceptable disturbance to those hikers that visit the Na Pali Coast, wishing to attain a true 'Wilderness experience'". This conflict is discussed on page 35 of the EIS, to illustrate the types of experience sought by various users, and how these uses may conflict. We have not made an attempt to subjectively assign a value to any of these uses, nor was an attempt made to rank the rights of various segments of the population to the Na Pali Coast. In a situation where uses conflict, any management plan will compromise rights of some users for the benefit of others. Establishing the extent of this trade off, and whose rights will be compromised, will be best handled by the Division of State Parks in their forthcoming management plan.

Mr. Frank Miller

-3-

November 8, 1978

Your opinions on the management of uses of the Na Pali Coast are well stated and will be of value to the Division of State Parks in creating the management plan.

V. 1. If helicopter landings are curtailed, emergency evacuation will still be possible. However, it will be more difficult to contact helicopters as they will have to be flagged down during scenic flights, rather than contacted during landings. This information has been added to the text of the EIS in the No Project Alternative Section.

V. 2. Helicopter charter fees are approximately \$250.00 an hour. The cost to the State for contracting for litter pickup would have to be negotiated and would depend on the frequency of removal desired and the amount of trash brought in by campers.


V. 3. No response required.

V. 4. The test has been changed to read "the Na Pali Coast is used primarily as a recreation area". The original wording was not intended to imply the superiority of any use.

V. 5. No response required.

We are enclosing a letter received from the Division of Forestry, which may be of interest to you, as it touches on the EIS-CDUA process. The letter was written in response to the Notice of Preparation, but was received too late to be included in the EIS. It will be included in the Revised EIS.

Sincerely,


Fred Proby
Chief Environmental Scientist

FP:db
Enclosure

B-43

V.

Ms. Dana Peterson
2641 Nāmau'u Drive
Honolulu HI 96817

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

6 November 1978

Dear Mr. Proby --

I would like to make some brief comments on the EIS for "Helicopter Landings on the Na Pali Coast", if my letter is not too late to be considered. Also, I would like to thank you for your prompt and thorough response to my comments on the EIS Preparation Notice. I am pleased to see that all of my concerns were indeed dealt with in the EIS.

As a frequent wilderness visitor, the issue of most concern to me is that of interference with the "wilderness experience". This issue, of necessity due to its aesthetic nature, remains an "unresolved" one (as noted on p.47 and elsewhere in the EIS). Despite past habitation in the Na Pali area, it can be considered wilderness, and provide a "wilderness experience", due to its remoteness. Providing helicopter access negates this remoteness to one degree or another no matter how it is restricted. "Unrestricted access" and "no access" alternatives are both unsatisfactory given the issues involved; the question is, what kind of restrictions should be levied?

It seems to me that helicopter landings in the areas accessible by trail (Hanakapiai, Hanakoa and Kalalau) should be only for emergencies (the distressed person would need to signal for rescue from a passing tour copter), and for pressing management needs. People unable to hike the distance or make the sea voyage will just have to view the area from a distance. A wilderness area is not supposed to be for everyone! That's what parks are for.

The trash pick-up 'service' does not seem major enough to warrant regular landings. Trash can be taken from these areas by boat. Furthermore, providing frequent and obvious pick-up of trash, and having receptacles for trash, encourages people to leave it rather than pack it out (signs encouraging the latter should be posted).

As for the areas inaccessible by trail (Honopu to Milolii), perhaps very restricted landings could be allowed, such as one or two a day. Having some landings will allow access to those without boats and keep visitation low; having frequent landings will detract significantly from the enjoyment of any people there. If the helicopters are allowed to land, they might be required to take out trash from those areas, to mitigate the effects of their passengers (and make their customer's stay more enjoyable by keeping the litter minimal).

I would like to commend you for the comprehensiveness of your EIS, and your even-handed approach to the "unresolved issues". I hope that the DLNR board members will be able to find a satisfactory compromise!

Thank you for the opportunity to comment.

B-44

Sincerely
Ms. Dana Peterson



Engineers • Architects • Planners - Surveyors - Environmentalists

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

November 8, 1978

Ms. Dana Peterson
2641 Namauu Drive
Honolulu, Hawaii 96817

Subject: Comments on the EIS for Helicopter Landings
on the Na Pali Coast, Kauai, Hawaii

JN 18-103

Dear Ms. Peterson:

Thank you for your review of the subject EIS. Since most of your concerns can only be resolved through the master plan being developed for the Haena-Na Pali State Park, I only have a few comments to make in response.

The helicopter operators have been working with the various agencies involved in this issue to develop a guideline for helicopter landings. A draft set of voluntary regulations have been submitted to the Board of Land and Natural Resources.

Of the areas accessible by trail, only the Kalalau Beach helipad has been requested for landings. If the self-imposed restrictions on landing hours (8:00 - 9:30 A. M. and 3:30 - 5:00 P. M.) and numbers of day users (360 per month total for all areas with no more than 24 landed at one site in a day) are not adequate, eliminating landings at Kalalau may be considered.

Trash pick up is not offered as a justification for regular landings, but it is a benefit of the current helicopter operations.

The Division of State Parks is proceeding on their master plan for the Haena-Na Pali State Park, so you will have additional opportunities to be involved in the planning for the Na Pali Coast.

Sincerely,

Fred L. Proby
Chief Environmental Scientist

FP:sb

B-45



AMERICAN LUNG ASSOCIATION
OF HAWAII

ENVIRONMENTAL IMPACT STATEMENT REVIEW

an air quality assurance program

Project: Helicopter Landings on the Na Pali Coast

Date: November 6, 1978

The EIS failed to address air quality impact. While recognizing that the proposed action does not represent the introduction of a large, continuous source, it does, however, represent a regular introduction of mobile source emissions into an otherwise pristine area. It is quite analogous to the noise situation which represents the regular introduction of mobile source emissions (energy in the form of sound). In fact, the sound emissions decay much more quickly than the fuel exhaust emissions, yet the former were extensively discussed in the EIS while the latter were not even mentioned. Some analysis of the air pollutant emissions and their impact on air quality should have been included.

James W. Morrow
James W. Morrow, Director
Environmental Health

JWM:ct

cc: OEQC
VTN Pacific

STATE OFFICE
345 N. Kukui St.
Honolulu, Hawaii 96817
Telephone 521-5988

HAWAII COUNTY
Post Office Box 925
Hilo, Hawaii 96720
Telephone 935-1208

KAUAI COUNTY
Post Office Box 991
Lihue, Hawaii 96766
Telephone 245-4142

MAUI COUNTY
Cameron Center
Wailuku, Hawaii 96793
Telephone 244-5110



Engineers • Architects • Planners • Surveyors • Environmentalists

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

November 8, 1978

Mr. James W. Morrow
Director, Environmental Health
American Lung Association
245 North Kukui Street
Honolulu, Hawaii 96817

Subject: Comments on the EIS for Helicopter
Landings on the Na Pali Coast, Kauai,
Hawaii

JN 18-103

Dear Mr. Morrow:

Following your suggestions in your letter of November 6, 1978, we have added a brief discussion of air quality impacts in Chapter IV of the Revised EIS.

Sincerely,

Fred L. Proby
Chief Environmental Scientist

FP:sb

November 5, 1978

VTN
1164 Bishop St.
Suite 906
Honolulu, Hawai'i 96813

Atten: Mr. Fred Proby

Subject: Environmental Impact Statement for Helicopter
Landings on the Na Pali Coast.

Gentlemen:

I believe the EIS to be incomplete and inadequate for the following reasons:

1. The helicopter companies have apparently claimed that there is "implied consent" on the part of the DLNR in regard to past landings on Na Pali Coast. So far as I can determine, there is no such thing as implied consent in regard to Conservation lands. The helicopter companies should have included the dates they started landing on the Na Pali Coast and other areas such as Koke'e/Waialeale/Kawainui and the circumstances of any real or implied consent on the part of the DLNR. The State has had plans for the Na Pali Coast-Haena State Park for more than 14 years. Regulation I, Division of Forestry, includes the following restrictions on government lands in forest reserves of the State and on private lands placed under control of the Board of Land and Natural Resources: "(g) The launching or landing of airplanes, gliders, helicopters, balloons, para chutes or other similar means of transportation without a special use permit from the Board or its authorized representative, except that landings are authorized without a permit in case of an emergency".

If permission for the landings was never given by the DLNR, the helicopters are landing illegally and if any permission "implied" or otherwise was given, the DLNR may be in violation of Section 183-41 and Chapter 171, Hawai'i Revised Statutes. No official announcement has been made publicly by the DLNR in regard to a temporary variance.

2. The helicopter landings are also in violation of the State Environmental Impact Statment law because they continue even though an EIS has not been filed and approved by the Environmental Quality Commission and the Governor.

3. The EIS states that Papillon Helicopters, Inc. is based at the Princeville airport and Kenai flies out of Lihue. It is not mentioned that Papillon helicopters also operate from a site near the Club Mediterranee and have been seen landing in various other areas that have never been designated as heliports or even as helispots.

4. The figures on the total number of passengers carried by the two helicopter companies are open to question. For instance, because Papillon Helicopters, Inc. has been issuing DLNR Parks Division camping permits to its passengers (according to the owner), illegally, and because the helicopters have landed at undesignated sites, the figures on numbers of passengers cannot be officially verified.

5. The helicopter companies are asking for permission to land at Kalalau Beach, Koke'e Lodge, Awaawapuhi Valley, Nualolo Aina Valley, Nualolo Kai Beach, Honopu Beach, Miloli'i Beach and Polihale Beach. This leaves few areas in the Na Pali-Koke'e area that would be unaffected by landings or over-flights. The EIS says these stops give the passengers an opportunity to stretch and usually take ten minutes or less. It would seem that permission to land at these sites would give preference to the enjoyment of the area to the "more affluent, out-of-state visitors on short trips to Kaua'i", than to the less affluent Hawai'i residents who want to experience a true wilderness experience. Also, the question comes to mind; are these stops always for an opportunity to stretch, or are they also utilized as "restroom" stops. If so, they are adding to an already unacceptable level of pollution along the Na Pali Coast.

6. The EIS says that the highest noise levels from the helicopters comes when it is revving the engines on a landing site or when hovering at less than 100 ft. elevation, and this occurs only briefly in the Na Pali area, usually when the helicopter pilots approach waterfalls at the head of the valleys to afford passengers a better look at them. (Some passengers have remarked after a sightseeing tour that the helicopters fly so close to the cliffs that it is impossible to take a full picture of a waterfall.

The EIS also says that a hiker in a valley would hear the noise for about a minute or for up to 1½ minutes on the trail. Thus on a peak summer day, the hiker would hear about 18-22 helicopter pass-bys, or about 27-33 minutes of noise a day. This statement reveals either a complete lack of understanding regarding a wilderness experience or complete indifference to the problems of noise. In actuality what happens under these circumstances is not that a period of 27-33 minutes of a day's wilderness experience would be spoiled, but a full day's experience would be interrupted by the sound of helicopters at their loudest.

It is a well-known fact that sound travels upward, therefore these pass-bys, as well as the landing and hovering, cannot but help disturb the endangered birds' nests. The EIS is especially deficient in its discussion of the affects on the rare birds.

7. The fact that the entire Na Pali Coast, Haena to Polihale has been placed on the State Register of Historic Places and has been nominated to the National Register of Historic Places, makes

it necessary for the State to protect the area, which is under the protection of the Federal government until the historical determination is determined. The Federal government can rule the landings illegal.

The National Park Service defines a wilderness area, as "land retaining its primeval character and influence which generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable...". Under the National Wilderness Act, the use of aircraft and motorboats may be permitted subject to restrictions deemed desirable, however, this does not mean that previously established motorboat and aircraft uses of an area must be allowed to continue in an area designated as wilderness. Administrative use of motorized equipment or mechanical transport, including motorboats and aircraft is permitted only in "emergency cases involving the health and safety of wilderness users or the protection of wilderness values", and, "as necessary to meet the minimum needs of management to achieve the purpose of the area".

When sites of any kind are put on the National Register of Historic Places, Federal monies are available for their maintenance and protection. The State of Hawai'i might find it more beneficial financially, not only for the State, but for the County of Kaua'i, to cooperate in putting the Na Pali Coast-Haena area on the permanent roster and to protect it in the interior, than permitting its commercial exploitation.

Yours truly,

Helen C. Hopkins

For: LIFE OF THE LAND

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

cc to LOL



Engineers • Architects • Planners - Surveyors - Environmentalists

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

November 8, 1978

Helen C. Hopkins
P. O. Box 266
Hanalei, Hawaii 96714

Subject: Comments on the EIS for Helicopter Landings JN 18-103
 on the Na Pali Coast, Kauai, Hawaii

Dear Ms. Hopkins:

Thank you for your comments on the subject EIS. Your extensive review is appreciated; our responses to your comments follow:

1. It is true that helicopter landings on the Na Pali Coast were not regulated in the past by the DLNR. The State is now doing so, and as an indication of their intent to cooperate, the helicopter firms have submitted voluntary regulations. It is beyond the scope of this EIS to reconcile the legal issues that you have pointed out, except to say that steps are being taken to solve the problems.
2. See above response.
3. The EIS is for helicopter landings on State lands of the Na Pali Coast. Landings on private property are at the discretion of the property owner, as long as FAA regulations concerning the rights of adjacent property owners are not violated.
4. The helicopter firms keep daily flight logs, and this data was used to develop Figures 7 and 8 and the other references to helicopter passenger volumes. These numbers are reliable. However, there is no count on the number of persons hiking in, so the Division of State Parks' figures on visitor usage is only an estimate. Since it is not known what proportion of hikers do not obtain a permit, there is no way to adjust the permit-derived data. Papillon helicopters has been issuing camping permits at the request of the Kauai office of the Division of State Parks. This is analogous to a sporting goods store issuing fishing licenses.

November 8, 1978

5. The EIS has not attempted, and should not attempt, to subjectively rank the rights of various categories of people to use the Na Pali Coast. The areas in which scenic tour rest stops are most frequently made are not conducive to "restroom" stops since there are no bushes or large rocks for cover. There are facilities at Kokee Lodge and the State Parks for this.

6. The text on page 33 of the Revised EIS (paragraph e) will be changed to reflect the impact of the repetitive interruptions of quiet brought about by helicopter operations. The EIS addresses the effect of helicopters on wilderness quality on page 35. Voluntary regulations proposed by the helicopter companies include limiting landings and take-offs to 1-1/2 hour periods in the morning and late afternoon. As long as the helicopters do not fly low over the top of the Pali, the rare bird populations in the Alakai Swamp will not be affected. The helicopters are not audible once they pass behind a ridge.

7. Your suggestion regarding the placing of the Na Pali Coast on the National Register of Historic Places is acknowledged. Much of the Na Pali Coast can not meet the NPS definition of a "wilderness", since modern man has had a strong influence, particularly on the vegetation. This does not mean that the area can not provide a quality wilderness-type experience, but the official distinction should be recognized.

The Division of State Parks is proceeding on their master plan for the Haena-Na Pali State Park, so you will have additional opportunities to be involved in the planning for the Na Pali Coast.

Sincerely,



Fred L. Proby
Chief Environmental Scientist

FP:sb

Teresa S. Tico

Attorney-At-Law

P. O. Box 2065

Puhi, Kauai, Hawaii 96766 — (808) 245-9696

November 7, 1978

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

RE: Helicopter Landings on the Na Pali Coast
Environmental Impact Statement

Dear Mr. Proby:

I have been retained by various community organizations and citizens to represent them in any administrative and/or court proceedings regarding the above matter.

As you know, there is strong opposition, in the County of Kauai, and throughout the State of Hawaii, to the helicopter landings on the Na Pali Coast. My clients, who are opposed to the landings, include, but are not limited to, the Kauai Hunters' Association, Kauai Community Research Group, Life of the Land, David Ainoa, Helen Hopkins, James Palmeira, Winona Sears, George Taguma, Linda Levy, and Dr. Arnold Nurock.

The above named organizations and citizens, as well as many others who do not wish to be named at this time, will be plaintiffs in a lawsuit against the DLNR, Papillon, Kenair and Harter Helicopters, should the DLNR issue a CDU permit, and should the helicopter companies continue to make their Na Pali landings in the face of public opposition.

For the purposes of this letter, comments will be addressed to the EIS. I might add that some of these comments are grounds for the complaint should litigation become necessary.

1. No SMA Use Permit. Even if a CDU permit is issued, the helicopter companies have filed to comply with the Coastal Zone Management law which requires special management area

Mr. Proby
11/7/78
page 2

use permits. The helicopters are landing within the coastal zone management area and are required to comply thereto. The EIS fails to mention this issue.

2. No permits from Director of Health, as per Sections 342-23 and 342-33, HRS. These sections prohibit activities which might cause air pollution and excessive noise, without the requisite permits. The helicopters are polluting the air and making a lot of noise, however, no permits have been secured therefor. The EIS fails to mention this issue.

3. Primary Impacts: "Passenger Statistics." This section fails to mention that many of those who walk into the Na Pali and leave by helicopter would not have walked in to begin with but for the availability of helicopter departure transportation. "Noise Impacts." This section fails to cite any independent studies or research by qualified agencies, individuals, etc. (i.e., Citizens Against Noise).

4. Secondary Impacts: No tests or studies are cited; no independent experts or analysts were consulted; no research, etc. Very unprofessional and shoddy report.

5. Irreparable Injury to Wildlife: EIS fails to mention the irreparable damage the helicopters have inflicted on wildlife mating and herding patterns.

Thank you for your consideration of the above comments.

Sincerely,



Teresa S. Tico

cc: William Thompson
DLNR



Engineers • Architects • Planners

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

November 9, 1978

Teresa S. Tico
Attorney-at-Law
P.O. Box 2065
Puhi, Hawaii 96766

Subject: Comments on the Environmental
Impact Statement for Helicopter
Landings on the Na Pali Coast,
Kauai, Hawaii

JN 18-103

Dear Ms. Tico:

Thank you for your letter of November 7. We offer the following responses to your comments on the subject EIS:

1) A reading of the second paragraph of page 46 of the EIS would have revealed that Special Management Area Use Applications (accompanied by the EIS) were indeed filed by the two helicopter companies with the Planning Department of the County of Kauai. The date of filing was on or about October 13.

2) Section 342-33 HRS states, in part; "...No person, including any public body, shall engage in any activity which causes air pollution without first securing approval in writing from the director...." "Air Pollution" is defined in Section 342-21, HRS, as follows: "... 'Air Pollution' means the presence in the outdoor air of substances in quantities and for durations which endanger human health and welfare, plant or animal life, or property or which unreasonably interfere with the comfortable enjoyment of life and property throughout the State and in such areas of the State as are affected thereby, but excludes all aspects of employer-employee relationships as to health and safety hazards..."

November 9, 1978

The revised EIS contains a brief description of the air quality impacts of helicopter landings on the Na Pali Coast. While it is true that helicopter operations constitute the regular introduction of mobile source emissions in an otherwise pristine area (from the air quality viewpoint), the resulting concentrations of pollutants in the air would be quite low. The Revised EIS for the Lihue Airport Master Plan (November 1976, ECI, Inc.) included an analysis of helicopter emissions under extremely adverse meteorological conditions (Class F). The resultant peak hour concentrations were: CO, 3.03 mg/m³; HC, 28 mg/m³, and NO_x, 303 mg/m³. The State standards are: CO, 10 mg/m³ (1 hour); HC, 100 mg/m³ (3 hour) and NO_x, 70 mg/m³ (annual). Because the landings on the Na Pali Coast are less frequent at any given site and are of shorter duration than at the airport, pollutant concentrations would be much less.

The question of whether pollutant emissions from the helicopters constitute unreasonable interference with the comfortable enjoyment of the Na Pali Coast may have some validity. The odor produced by an idling helicopter does detract from the wilderness quality of the area. However, the applicability of this rule to the present situation is an issue for the Director of Health to resolve.

Section 342-33, HRS deals with water quality, not noise, as your letter states. Noise pollution is covered by Section 342-43, HRS. This latter section prohibits any person from engaging in activities which produce "excessive" noise. Unfortunately, there has been, to date, no regulation promulgated by the Department of Health establishing noise standards for the Na Pali Coast Area. The existing standards are for residential areas on Oahu. The noise measurements made by personnel of VTN Pacific in the Na Pali area and presented in the EIS are intended to provide preliminary data which can serve as a starting point for discussion leading to the establishment of noise standards for the Na Pali Coast. It is hoped that your clients will provide valuable input to these discussions.

3) Data on passenger statistics presented in Figure 9 of the EIS shows that there were approximately 60% more passengers picked up than dropped off by helicopters at Kalalau during the 1977-78 fiscal year. Poor weather is a major factor in many of the hikers' decisions to fly out rather than walk. It is possible that some plan their trip counting on the availability of helicopters, but their numbers are unknown.

Ms. Tico

-3-

November 9, 1978

To our knowledge, VTN Pacific has conducted the only noise measurements of helicopter operations on the Na Pali Coast. Studies of other areas could be brought into the discussion, but as noted above, our purpose in presenting this noise data is to characterize the current situation in the study area.

4) Our noise measurements were a "test", studies are cited where appropriate and page 51 lists independent experts who were consulted. The purpose of this EIS is to provide a concise and objective evaluation of the issues surrounding the helicopter landings on the Na Pali Coast.

5) The conclusion on page 35, that the helicopters have no lasting effect on bird life should have cited John Sincock as the source of that opinion. Mr. Sincock is an ornithologist with the U. S. Fish and Wildlife Service on Kauai (as listed under personal contacts), and is respected as one of the foremost authorities on Newell's Shearwater. Mr. Sincock has spent many hours of observation on the Na Pali Coast, and though he has not published a report that deals with the effects of helicopters on the birds and other wildlife, he is a credible source of information.

Sincerely,


Fred Proby
Chief Environmental Scientist

FP:db

B-57

V.