TO:          GARY GILL, DIRECTOR  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL  
DEPARTMENT OF HEALTH  

FROM:        KAZU HAYASHIDA  
DIRECTOR OF TRANSPORTATION  

SUBJECT:FINDINGS OF NO SIGNIFICANT IMPACT FOR REALIGNMENT OF  
WAAPA ROAD, NAWILIWILI HARBOR, KAUAI - JOB H.C. 7232;  
FEDERAL-AID PROJECT NO. NH-0700(42)  
In accordance with Act 241, SLH 1992, we have completed the formal Draft Environmental  
Assessment 30-day review period. We have not received any adverse comments and have  
determined that this project will not have a significant environmental effect. Therefore, we are  
filing a Finding of No Significant Impact (FONSI). Please publish this notice in the March 27,  
Enclosed are the original and four copies of the FONSI and a completed OEQC Bulletin  
Publication Form.  
Should you have any questions, please call Carter Luke of our Harbors Division at  
587-1959.  
Enc:Project Description (Disk, File Name: projdes.wpd) - Please Return  
c:Mr. Wayne Wada, Vice President  
Esaki Surveying & Mapping, Inc.  
Ms. Nadine Nakamura, Planner  
NKN Project Planning
Final Environmental Assessment

Realignment of Waapa Road,
Nawiliwili Harbor, Kauai -
JOB H. C. 7232

Harbors Division
Department of Transportation
State of Hawaii

Prepared for:
Esaki Surveying and Mapping, Inc.
1610 Haleukana Street, Lihue, Hawaii 96766

NKN Project Planning
March 1998
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Project Summary

Project Name: Realignment of Waapa Road, Nawiliwili Harbor, Kauai - JOB H. C. 7232

Proposing Agency & Approving Agency: Harbors Division
Department of Transportation
State of Hawaii
79 S. Nimitz Highway
Honolulu, Hawaii 96813

EA Preparer: NKN Project Planning
4849 Iiwi Road
Kapaa, Hawaii 96746

Location: Waapa Road, between the end of Pier 2 and the Honolulu Gas Company site adjacent to Pier 3, at Nawiliwili Harbor, Kauai.

Proposed Action: Proposed action is to realign approximately 500 linear feet of Waapa Road. Straightening the road will make the road safer for all vehicles traveling through this section of Nawiliwili Harbor.

Impacts & Benefits: Temporary impacts during construction include minor degradation of air, water, and noise quality and safety. In addition, the project will inconvenience passing motorists along the construction site and overall operations in the Nawiliwili Harbor. Positive impacts include the upgrading of sight distances and the safety of Waapa Road and short-term economic impacts of construction activity.
I. Project Description

1.1 Purpose of the Proposed Action

The purpose of the Waapa Road realignment project is to make the road safer for all vehicles traveling through this section of Nawiliwili Harbor. Presently, many vehicles traveling on Waapa Road through this area exceed the posted speed limit of 15 miles per hour. Both large delivery trucks and passenger vehicles use the road shoulders to avoid potential accidents. Since the existing road is not designed for speeds above 15 miles per hour and sight distances are poor, this section of Waapa Road is considered dangerous. Over the past five years, there have been eight minor and major accidents on Waapa Road between Niumalu and Wilcox Roads (Kauai Police Department, 1997).

Realignment of Waapa Road is consistent with recommendations arising from the Master Plan Update for Nawiliwili Harbor (State of Hawaii, Department of Transportation, Harbors Division, 1993) and Development Plan/Design Guide for Pier 3 Development (State of Hawaii, Department of Transportation, Harbors Division, 1990). The master plan for Nawiliwili Harbor is found in Figure 1.

1.2 Location

Waapa Road is the main interior road serving Nawiliwili Harbor, which is the central shipping port serving the island of Kauai. The proposed 500-foot realignment is located between the end of Pier 2 and the Honolulu Gas Company site adjacent to Pier 3. A location map is shown in Figure 2. A project plan is shown in Figure 3.

1.3 Description

Proposed action is to straighten the bend in Waapa Road to meet the following design criteria:

- Travelway of 24 feet
- Posted speed limit of 25 miles per hour
- Roadway centerline radius of 300 feet minimum
- Sight distance of 200 feet minimum
Figure 1
1993 Nawiliwili Harbor Master Plan

Figure 3
Proposed Waapa Road Realignment Plan
1.4 Permits Required

The project will require a Special Management Area (SMA) permit since a portion of the project is under the jurisdiction of the County of Kauai.

1.5 Construction Materials and Methods

The existing road will be realigned to meet the design criteria described above. An asphalt concrete surface will be installed along the realigned roadway.

The proposed alignment requires cutting back the rock slope mauka of the existing Waapa Road by approximately 20 feet. Mechanical equipment will be used to remove approximately 2,600 cubic yards of rock. The project will also involve relocation of existing water, drain, phone, and electrical lines.

1.6 Estimated Construction Schedule and Cost

Construction is expected to begin in the summer of 1998, lasting about six months. The estimated construction cost is approximately $1,000,000, which will be jointly funded between the U.S. Department of Transportation, Federal Highways Administration and the State of Hawaii, Department of Transportation, Harbors Division.
II. Affected Environment and Potential Impacts and Mitigative Measures

2.1 Existing Land Use

The project site is a two-lane, undivided interior roadway serving Nawiliwili Harbor. The road is primarily used by customers of Young Brothers, Small Boat Harbor users, Niulalu residents, visitors to Alakoko (Menehune) Fish Pond. With the recent opening of the Puhi by-pass road, Waapa Road is also used by West Kauai residents.

Most of Waapa Road is under the jurisdiction of the State of Hawaii, Department of Transportation, Harbors Division. A small portion of the project site, approximately 100 linear feet, is owned and operated by the County of Kauai.

North of the project site is Niulalu Road. East of the project site is Pier 2, which handles passengers and general cargo. South of the project site is the harbor basin and Pier 3. West of the project site is the BHP/Gas Company site.

The State of Hawaii Land Use Classification of the project site is “Urban.” The project site is designated “Urban Mixed Use” in the County of Kauai General Plan and “General Industrial” in the County of Kauai Comprehensive Zoning Code. The project falls within the County of Kauai Special Management Area. Photographs of the project site are attached as Appendix A.

Impacts and Mitigation Measures

The proposed realignment of Waapa Road is not anticipated to have impacts on land uses in this area. As part of this project, the existing Waapa Road will be demolished, the asphalt concrete paving will be removed, and grass will be installed.

2.2 Topography, Geology, Soils

The existing Waapa Road is generally level. North of the road is a 70-foot high rock slope with a slope that varies from 1:1 to 1.5:1. The rock slope exposes a thin layer of soil consisting of clayey silt overlying moderately to slightly weathered basalt. A topographical map of the project site is found in Figure 4.
Soils in the project area consists of two soil types: Rough broken land (rRR) and Hanalei silty clay (HnA). Rough broken land soils are typically located on very steep land, has rapid runoff, and active geologic erosion. Hanalei silty clay has very slow runoff and no more than slight erosion hazard (U.S.D.A. Soil Conservation Service, 1972).

Average temperatures in this area range from 71 to 79 degrees Fahrenheit. The average annual precipitation is about 44 inches (State of Hawaii Data Book, 1993-1994).

**Impacts and Mitigation Measures**

The proposed project will alter the topography of the area. From the mauka edge of the existing Waapa Road, the rock slope would be excavated about 20 feet deep and 70 feet high. Excavation would displace about 2,600 cubic yards of rock and about 430 cubic yards of dirt.

Two alternatives were considered for the removal of the 70-foot high rock slope: using mechanical equipment or blasting. After considering potential impacts to nearby gas tanks, noise, and public safety concerns, mechanical equipment will be used to remove the rock slope.

**2.3 Flood Hazard**

In accordance with Federal Emergency Management Flood Insurance Rate Map, Panel 202, the project site is in Zone X (unshaded). As defined by the Federal Emergency Management Agency (FEMA), this area is outside the 500-year flood plain.

**Impacts and Mitigation Measures**

The proposed project will not contribute to flood impacts to the surrounding area.
2.4 Flora and Fauna

Vegetation in the project area includes grasses, weeds, and koa haole.

Fauna species that typically inhabit the near shore environment include the gull, cardinal, dove, sparrow, feral cat, feral dog, mouse, and rat.

**Impacts and Mitigation Measures**

No rare, threatened and/or endangered species of flora and fauna are known to inhabit the project area (The Nature Conservancy, Hawai‘i Natural Heritage Program, 1997).

2.5 Historic, Cultural, and Archaeological Resources

The breakwater for Nawiliwili Harbor was constructed in 1926 and was enlarged to its present size in 1956. Harbor and shipping activities have evolved to include interisland container operations, barge operations, tug boat operations, Coast Guard operations, charter boat fishing, recreational boating, cruise ship operations, and warehousing of shipping cargo.

**Impacts and Mitigation Measures**

There are no known archaeological or historic resources in the project area due to the heavy impacts of the harbor and prior sugarcane cultivation. The proposed project, therefore, will have “no effect” on significant historic sites (Department of Land and Natural Resources, 1997).

2.6 Noise

Aircraft noise is generated by planes and helicopters arriving and departing from Lihue Airport, located less than two miles from the project site. Truck and vehicular noise is generated by both local and regional traffic. Noise is also generated by shipping operations and passenger ships within Nawiliwili Harbor.

**Impacts and Mitigation Measures**

The proposed project is not anticipated to have long-term adverse noise impacts on the surrounding environment. However, there will be temporary
noise impacts during the construction of the new road. Excavation and construction machinery will increase noise levels in the project area. Contractors will work during scheduled hours of the day and comply with State Department of Health noise regulations during construction.

2.7 Air Quality

The air quality of the project site is impacted by shipping and industrial activity within the Nawiliwili Harbor area. Contributors to air pollutants include vehicles and vessel emissions.

Impacts and Mitigation Measures

Excavation and construction for the realigned section of Waapa Road will increase the amount of fugitive dust in the air. Construction machinery will increase exhaust gases in the area of the proposed project. These temporary construction nuisances cannot be avoided but can be mitigated by frequent water sprinkling of exposed dirt surfaces. Contractors will comply with State Department of Health regulations regarding air quality during construction. The Contractor will also be responsible for keeping adjacent areas free of mud, sediment, and construction debris.

2.8 Traffic and Circulation

From Lihue, access to Waapa Road is via Nawiliwili Road, Wilcox Road, and Kanoa Street. From Ni‘ihau Road, access to Waapa Road is via Ni‘ihau Road.

Many of the vehicles traveling on roads within the harbor area involve harbor or shipping related transport or employee travel. Nearby residential areas and the Small Boat Harbor also generate traffic through this area. The recent opening of the Puhi bypass road has added regional traffic through the harbor area.

Although the speed limit within the harbor area is 15 miles per hour, many vehicles exceed this limit. The portion of Waapa Road that is owned by County of Kauai, which is part of the project area, has a speed limit of 25 miles per hour.

While two lanes of Waapa Road will remain open, there will be times when portions will be closed during construction. Traffic would then be diverted to
the remaining lane or the road shoulder. Should construction require the temporary closure of two lanes, traffic will be diverted to Niumalu Road.

**Impacts and Mitigation Measures**

While two lanes of Waapa Road will remain open, there will be times when portions will be closed during construction. Traffic would then be diverted to the remaining lane or the road shoulder. Should construction require the temporary closure of two lanes, traffic will be diverted to Niumalu Road.

Temporary lane closures will impact the flow of traffic and increase travel time. Lane closures will be scheduled around high traffic periods immediately following the arrival of inter-island barges. Construction will take place during non-peak hours to minimize traffic disruption. Flag men or off-duty police officers will be stationed to direct traffic flow. Residents and businesses would be notified in advance of lane closures.

2.9 **Utilities**

Utilities that run along Waapa Road include a 12-inch waterline, a fire hydrant, a drain inlet, three power poles, and telephone lines. There are no sewer lines along Waapa Road.

A gas line and easement presently connecting the Pier 2 area and the Gas Company site may be terminated. In lieu of this line, The Gas Company is currently using a gas line from the Pier 3 area to feed their tanks.

**Impacts and Mitigation Measures**

The proposed project will require relocation of 360 linear feet of the 12-inch waterline to the mauka shoulder of the realigned roadway. Three power poles with lights will be relocated, the existing 24-inch drain line will be extended 40 feet, and the fire hydrant will be relocated.

2.10 **Scenic and Visual Resources**

Facing makai from the project site is a view of Nawiliwili Bay, Pier 2, and Pier 3. Facing mauka from the project site is a view of the 70-foot high rock slope that demarcates the northern boundary of harbor activities in this area.
Impacts and Mitigation Measures

The proposed project would change the view of the rock slope from pedestrians and passing motorists. The familiar "bend" in the road, commonly used to describe this portion of Waapa Road, would be cut back approximately 20 feet. The detailed design of improvements will attempt to minimize impacts to the rock slope while improving the overall safety of Waapa Road.

2.11 Economic Activity

The proposed realignment is estimated to cost $1 million.

Impacts and Mitigation Measures

The planning, design, and construction of the proposed project will generate temporary employment opportunities. This will incrementally improve Kauai’s economy in the short-term.

While construction may cause temporary inconveniences to residences or businesses along the project sites, there will be no long-term adverse economic impacts.
III. Alternatives to the Proposed Action

3.1 "No Build" Alternative

Under the "no build" alternative, Waapa Road remains a two-way road with a posted speed limit of 15 miles per hour, a substandard roadway centerline radius at 140 feet minimum, and substandard sight distance at 160 feet.

Vehicles will continue to exceed the posted speed limit and accidents will continue to occur in this area.

3.2 Alternative Alignments

Alternative alignments considered but not pursued include designing a straighter road, avoiding the rock slope altogether, and relocating the Pier 3 entrance. A straighter road would require a 45-foot cut into the existing rock slope, increase construction cost by 70%, and require a 15-foot high reinforced concrete retaining wall to support Niulalu Road. Avoiding the rock slope would have the greatest impact on future plans to extend Pier 2 and reduce the existing Pier 2 operating area. Relocating the Pier 3 entrance would interfere with activities occurring near the pier staging area and would not improve the road safety at the bend for all vehicular traffic passing through this area.
IV. Determination, Findings, and Reasons Supporting Determination

The proposed realignment of Waapa Road is not anticipated to cause significant negative impacts to the environment. It has, therefore, been determined that a Finding of No Significant Impact (FONSI) will be issued. The 13 findings and reasons that support each finding is discussed as follows:

1. The proposed action does not involve an irrevocable commitment to loss or destruction of any natural or cultural resources;
   
   There are no significant archaeological or historical sites in the project area due to the heavy impacts of the harbor and prior sugarcane cultivation. While the rock slope will be cut back by 20 feet, the rock formation, columna basalt, is commonly found in this area through Kipu Kai.

2. The proposed action does not curtail the range of beneficial uses of the environment;
   
   The proposed project is designed to make Waapa Road safer for harbor users and Kauai residents. The proposed alignment minimizes the impact to the rock slope, future harbor expansion, and waterfront.

3. The proposed action does not conflict with the State’s long-term goals or guidelines as expressed in Chapter 344, HRS;
   
   The proposed project is consistent with the Environmental Policies established in Chapter 344, HRS, and the National Environmental Policy Act.

4. The proposed action does not substantially affect the economic or social welfare of the community or state;
   
   While construction may cause temporary inconveniences to residents, businesses, and visitors, there will be no long-term adverse economic or social impacts. The planning, design, and construction of the project will generate temporary employment opportunities.

5. The proposed action does not substantially affect public health;
   
   The proposed project will not have long-term public health impacts in this area. However, there will be short-term air quality, noise, and traffic impacts associated with construction of the project. Measures to mitigate these impacts are described in this document.
6. **The proposed action does not involve substantial secondary effects;**

While the proposed project will make Nawiliwili Harbor safer for vehicular traffic, the improvement will not generate new population growth or negatively impact other public facilities.

7. **The proposed action does not involve substantial degradation of environmental quality;**

The proposed realignment is located in an area zoned for industrial uses and is the primary road within the main port serving the island of Kauai. The project is consistent with the general industrial character of Nawiliwili Harbor.

8. **The proposed action does not cumulatively have a considerable effect on the environment or involve a commitment to larger actions;**

The proposed project is designed to address an existing safety problem in Nawiliwili Harbor. The realignment of Waapa Road is a specific project that will neither entail a cumulative impact to the environment nor involve a commitment to larger actions.

9. **The proposed action does not affect a rare, threatened, or endangered species or its habitat;**

No rare, threatened, and/or endangered species of flora and fauna are located within the project area.

10. **The proposed action does not detrimentally affect air or water quality or ambient noise levels;**

As noted earlier, while there may be some constructed-related impacts to the air, water, and noise levels, the proposed project will not have long-term impacts to harbor users and residents in the surrounding area.

11. **The proposed action does not affect an environmentally sensitive area;**

The proposed project is not associated with a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, freshwater, or coastal waters.
12. The proposed action does not substantially affect scenic vistas and view planes identified in county or state plans or studies; and

A scenic look-out along Niulam Road is located above the rock slope. This look-out will remain in place and a guardrail will be installed for safety purposes. No scenic vistas or view planes will be impacted by the proposed project.

13. The proposed action does not require substantial energy consumption.

Construction of the proposed project will not require substantial energy consumption relative to other similar projects. The realigned road will not add to the amount of gas required to travel in a vehicle in this area.

For the reasons stated above, the proposed project will not have any significant effect in the context of Chapter 343, Hawaii Revised Statutes and Section 11-200-12, Hawaii Administrative Rules.
V. Parties Consulted

Copies of the Draft EA were sent to the organizations and individuals listed below. Parties with whom pre-consultation meetings were held are noted with an asterisk (*) next to their names. Pre-consultation meetings were held between September to October, 1997.

State

Department of Transportation, Harbors Division*
Department of Health
DLNR, State Historic Preservation Division*

County

The Honorable Maryanne Kusaka, Mayor
The Honorable Mary Thronas, Chair, County Council
Planning Department*
Department of Public Works*
Department of Water*
Police Department*

Community and Other Organizations

Young Brothers*
BHP Gas Company*
Cheryl Lovell-Obatake*
Lihue Library

Those who responded to the Draft EA in writing or by directly contacting the Harbors Division are listed below, with copies of the correspondence presented in the following pages.

Office of Hawaiian Affairs
Nancy L. Bunyan
Earl Edwards
Office of Environmental Quality Control

Kazu Hayashida
Director of Transportation

3/12/98
January 16, 1998

HAR-ED
1650.98

TO: RICHARD STOOK, LAND AGENT
OFFICE OF HAWAIIAN AFFAIRS

FROM: HARRY H. MURAKAMI
ENGINEERING PROGRAM MANAGER

SUBJECT: REALIGNMENT OF WAAPA ROAD, NAVILIWIJI HARBOR, KAUAI JOB H.C. 7272

As requested during your telephone conversation (on January 13, 1998) with Mr. Carter Luke of my staff, enclosed for your information is a copy of the Draft Environmental Assessment for the subject project. Also enclosed is a photo and an archaeological determination from the Department of Land & Natural Resources, State Historic Preservation Division.

Please call Mr. Luke at 587-1959 should you have any questions.

Enc.

HARRY H. MURAKAMI
Engineering Program Manager
Department of Transportation, Harbors Division
785 Nimitz Highway
Honolulu, Hawaii 96813

January 21, 1998

HARRY MURAKAMI
Engineering Program Manager
Department of Transportation, Harbors Division
785 Nimitz Highway
Honolulu, Hawaii 96813

Subject: Draft Environmental Assessment for the Realignment of Waapa Road, Island of Kauai

Dear Mr. Murakami:

Thank you very much for the opportunity to review the above-referenced draft environmental assessment (DEA). The Department of transportation proposes to realign a 500 foot section of Waapa Road in order to meet specific design criteria which would impact safety conditions of the road.

The Office of Hawaiian Affairs views the action as a necessity in order to ensure public safety and has no objections to the proposed project at this time. Based on the information contained in the DEA, the project does no significant long-term adverse impact on adjacent areas or existing flora and fauna habitats. Furthermore, no known archaeological remains exist, and the proposed project will not significantly affect scarce resources.

Please contact Colin Kappon, Land and Natural Resources Division Officer, or Richard Stook, EIS Planner at 584-1388, should you have any questions regarding this matter.

If you have any questions or comments regarding this matter please contact Colin Kappon, Land and Natural Resources Division Officer, or Richard Stook, EIS Planner at 584-1388.

Sincerely yours,

Colin Kapan, Officer
Land and Natural Resources

cc: Wayne Wada, Consultant
CAC, Kauai
Board of Trustees
January 26, 1998

Harbors Division
79 U. Ninole Highway
Hilo, Hawaii 96720

Gentlemen:

This letter is in protest of the straightening of Wa’apu Road in the harbor area of Ninole, Kona’i.

Since the opening of the bypass, there has been more traffic in the area, and the removal of the rock cliff will only enable vehicles to go faster. The bend in the road forces them to slow a bit.

Also, when there is a second ship in port, docking at Pier 3 (Young Brothers), the passengers have no sidewalk and must see the edge of the road. Faster traffic would be even more hazardous to them.

This bypass has been open only a few months, so it would seem the Police Department’s five-year accident report would not be pertinent to current conditions. I seriously ask you not to change the roadway.

Very truly yours,

Nancy L. Bumyan
2403 Ninole Rd.
Hilo, HI 96720-9537

February 10, 1998

Ms. Nancy L. Bumyan
2403 Ninole Road
Hilo, Hawaii 96726-9537

Dear Ms. Bumyan:

Subject: Redesign of Waapu Road, Newalleng Harbor, Kona, Hawaii

Job No. C-637, Federal Aid Project No. NA-2000 (42)

Thank you for your letter of January 26, 1998 relating to your concerns that straightening of Waapu Road will enable vehicles to go faster and passengers from cruise ships docked at Pier 3 have no sidewalk and must see the edge of the road.

The purposes of this project are to improve traffic safety and the safety of pedestrians walking along the roadway. Traffic safety will be improved by flattening the curve to increase sight distance. Currently, the roadway is used for a speed of 15 miles per hour (mph) and enforcement is difficult. Upon completion, the roadway will have a posted speed limit of 25 mph which would be consistent with the County of Kona’s speed limit along Ninole Road that connects to Waapu Road.

This project will also improve pedestrian safety with the inclusion of four-foot-wide paved shoulders along the improved section of Waapu Road.

For your information, this project is on the agenda of the County Planning Department’s public hearing on February 26, 1998 at 1:30 p.m. at the Hilo Civic Center, Meeting Room 2A-30, 444 Rice Street. My representatives will be present at the hearing and will be available to meet with you before or after the hearing to further discuss your concerns.

If you have any questions, please contact Ms. Carter Lake, Project Manager on Oahu at 387-1939 or Mr. Robert Crecel, District Manager at 245-6996. Your interest in this project is appreciated.

Very truly yours,

Thomas T. Fujihara
Harbor Administrator
February 13, 1998

Mr. Earl Edwards
2500 Numalu Road
Lihue, Hawaii 96766

Dear Mr. Edwards:

Subject: Realignment of Waapa Road, Nawiliwili Harbor, Kauai, Hawaii
Job H. C. 7232; Federal Aid Project No. NH-0700 (42)

Thank you for your concerns for the subject project and your interest in our project on Waapa Road. As requested during your telephone conversation with Mr. Carter Luke of my staff, enclosed for your information is a copy of the Draft Environmental Assessment for the project.

The purposes of this project are to improve traffic safety and the safety of pedestrians walking along the roadway. Traffic safety will be improved by flattening the curve to increase sight distance. Currently, the roadway is rated for a speed of 15 miles per hour (mph) and enforcement is difficult. Upon its completion, the roadway will have a posted speed limit of 25 mph which would be consistent with the County of Kauai’s speed limit along Numalu Road that connects to Waapa Road.

For your information, this project is on the agenda of the County Planning Department’s public hearing on February 26, 1998 at 1:30 p.m. at the Lihue Civic Center, Meeting Room 2A-2B, 4444 Rice Street. My representatives will be presenting this project at the hearing and will be available to meet with you before the hearing to further discuss your concerns.

If you have any questions, please contact Mr. Luke, Project Manager, on Oahu at (808) 587-1959, or Mr. Robert Crowell, Kauai District Manager, at 245-6996. Your interest in this project is appreciated.

Very truly yours,

Thomas T. Fujikawa
Harbors Administrator

Enc.

FEB 13 1998
February 9, 1998

TO:        The Honorable Kazu Hayashida, Director
            Department of Transportation

ATTENTION: Mr. Carter Luke, Harbors Division

FROM:     Director of Environmental Quality Control

SUBJECT: Comments on the Draft Environmental Assessment for the Realignment of Wa'apa Road,
            Nawiliwili Harbor, Kauai, Hawaii, Job H.C. 7232

Having reviewed the subject draft environmental assessment (DEA), we submit the following comments for
your response.

1) Please provide photographs of the existing site.

2) The significance criteria in Section 11-200-12, Hawaii Administrative Rules, were revised effective
   August 31, 1996. Please reevaluate your determination on page 15 in light of the revised criteria.
   A model evaluation (that thoroughly discusses each criterion and does not simply negate it) is
   enclosed for your information.

Please include a copy of this memorandum, any other comment letters and your responses in the final
environmental assessment and notice of determination for this project. If there are any questions, please
call Leslie Segundo of my staff at 586-4185. Thank you for the opportunity to comment.

GARY GILL

Enclosure

c:     Mr. Wayne Wada, Esaki Surveying & Mapping Inc. (w/enclosure)
       Ms. Nadine Nakamura, NKN Project Planning (w/enclosure)
VI. References

Department of Land and Natural Resources, Letter from Don Hibbard, Administrator of State Historic Preservation Division, November 7, 1997.


Lieutenant Isoda, Kauai Police Department, phone conversation with Nadine Nakamura, October 30, 1997.


Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii, United States Department of Agriculture, Soil Conservation Service in cooperation with The University of Hawaii Agricultural Experiment Station, August 1972.


Zakah, George, BHP Gas Company meeting with Wayne Wada, October 2, 1997.
VII. Appendix A: Photographs of the existing project site
WAAPA ROAD
From Pier 2 Traveling to the Small Boat Harbor
WAAPA ROAD  From Pier 2 Traveling to the Small Boat Harbor

Rock Slope on the Old Road