

1998-05-23-KA-PEA-Hawaiian Wildlife Tours

ENVIRONMENTAL ASSESSMENT

1  
MAY 23 1998

Hawaiian Wildlife Tours

**FILE COPY**

1. APPLICANT: Dr. Carl J. Berg, Jr.  
d.b.a. Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 96754  
(808) 639-2968
2. APPROVING AGENCY: Division of Forestry & Wildlife  
Department of Land & Natural Resources  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766  
(808) 742-3433

3. AGENCIES CONSULTED:

Department of Land and Natural Resources  
Division of Forestry & Wildlife  
Mr. Edwin Petteys  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766

Department of Land & Natural Resources  
Division of State Parks  
Mr. Wayne Souza  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766

Department of Land & Natural Resources  
Division of State Parks  
Ms Martha Yent  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766

Department of Land & Natural Resources  
Division of Aquatic Resources  
Mr. Don Heacock  
State of Hawaii  
Lihue, HI 96766

Department of Land & Natural Resources  
Division of Conservation and Resource Enforcement  
Mr. Max Andrade  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766

Department of Land & Natural Resources  
Division of State Historic Preservation  
Ms Nancy McMahon, Kauai Archeologist  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766

Department of Transportation  
Mr. Steven Kyono  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766

Department of Health  
Environmental Health Services  
Mr. Clyde Takekuma  
State of Hawaii  
3040 Umi Street  
Lihue, HI 96766

Department of Education  
Ms Amy Maeda, Kauai District Superintendent  
Mr. David Boynton, Environmental Education Teacher  
State of Hawaii  
3060 Eiwa Street  
Lihue, HI 96766

Fire Department  
Mr. David Sproat, Chief  
County of Kauai  
4444 Rice Street  
Lihue, Hi 96766

Planning Department  
Mr. Dee Crowell  
County of Kauai,  
4444 Rice Street  
Lihue, Hi 96766

Sierra Club, Kauai Group  
Mr. Rob Culbertson, Chair  
2400 Hulemalu Road  
Lihue, HI 96766

1000 Friends of Kauai  
Mr. Ken Carlson, President  
P.O. Box 698  
Kilauea, Hi 96754

Koke'e Natural History Museum  
Ms Marsha Erickson, Executive Director  
P.O. Box 100  
Kekaha, HI 96752

National Tropical Botanical Garden  
Dr. David H. Lorence, Senior Research Botanist  
P.O. Box 340  
Lawai, HI 96765

#### 4. DESCRIPTION OF ACTIVITIES

##### A. Technical Characteristics.

Hawaiian Wildlife Tours will provide guided hiking tours along established trails within state forest reserves and state parks. The purpose of the tours is aesthetic appreciation of Kauai's natural beauty and environmental education regarding Kauai's unique species, habitats, communities, and ecosystems. Field-lectures will be given regarding the geologic formation of the islands, the

development of its ecosystems, and the evolution of its species, depending on the particular interests of the clients. All tours are customized to the specific interests of the clients, their physical capabilities and health, the weather, and the seasonal abundance of wildlife.

All tours will be guided by the applicant, Dr. Carl J. Berg, Jr., who holds a Ph. D. in Zoology from the University of Hawaii (1971) and has been an active researcher and teacher in the fields of animal behavior and ecology for 30 years. He is a long-standing member of the Ecological Society of America, the Western Society of Naturalists, the Oceanography Society, and the Explorers Club. He is a corporate member of the Hawaii Audubon Society, the Hawaii Environmental Education Association, and the Hawaii Ecotourism Association and is a volunteer for the Kilauea Point National Wildlife Refuge and the Hawaiian Islands Humpback Whale National Marine Sanctuary. In addition, he has attended interpretive courses offered by the Kilauea Point National Wildlife Refuge, the Koke'e Natural History Museum, and Kauai Community College. He has been visiting Kauai regularly since 1971 and has been a resident since 1990. From 1991 to 1993 he worked for the Clean Water Branch of the Department of Health, monitoring water quality in Kauai's streams and ocean, and responding to pollution related events.

Tours will usually consist of two people and the guide, although a maximum of eleven clients can be accommodated. Because of the strenuous nature of some hikes, only children between the ages of 10 and 18 will be allowed, and only when accompanied by a parent.

Tours will be given throughout the year, weather permitting. No tours will be given on weekends or holidays, as these are peak times of use by local hikers and hunters. Frequency of tours may, at times, be daily, but will not exceed an average of once per week for any one trail. It will more likely average once per month per trail. Tours will be during daylight hours only.

No collecting will be allowed and no fires will be permitted. As all hikes will be of only two to eight hours duration, no camping will be done and no camping gear will be allowed. No climbing equipment, bicycles, or motorized vehicles will be used. Photography and video/audio recording will be encouraged, but commercial activities such as the filming of movies or advertisements will require separate permits.

Clients will drive to the trailhead and park in designated areas. If limited parking is available (e.g. at Halemanu-Koke'e Trail), then clients will be dropped off at the trailhead and the vehicle parked near the meadows. Since only individuals, couples, or very small groups will be taken on tours, only one vehicle will be used. A stop at toilet facilities at the Koke'e State Park picnic area or Keahua Forestry Arboretum will be made before entering the trails in those areas. If elimination is necessary along the trail, clients will be provided with double zip-lock plastic bags for collection of wastes, and these will be packed out of State lands and disposed of in a manner consistent with sound health principles and regulations.

Because trail hiking is potentially dangerous, certain precautions have been taken. The most hazardous trails were eliminated from consideration, as were trails that would not allow evacuation. A safety program was developed which includes: proper training (Dr. Berg is certified in C.P.R. and Emergency First Aid), emergency equipment (first aid kit, whistle, smoke canister and cellular telephone for obtaining emergency assistance), a procedure for signing in/out on trails or otherwise notifying family about which trails and alternates may be used, and contingency planning. Clients will be questioned about their medical problems and physical capabilities before the hike begins. They will be advised of proper attire, shoes, hat, sun screen, insect repellent, water supplies, etc.. A pre-hike safety orientation will be given explaining the dangers that might be encountered (including *Leptospirosis*), safety precautions that need to be followed, and emergency responses that would be used.

#### B. Economic Characteristics.

As sole owner and guide of Hawaiian Wildlife Tours, Dr. Berg holds fiscal responsibility for the company. Economic benefits from these tours extends throughout the local community via commissions paid for referrals, permit fees, insurance costs, advertising printing costs, gasoline costs, general excise taxes and income taxes paid to the state. In addition, Dr. Berg provides referrals to other local activities, restaurants, and business (e.g. Koke'e Natural History Museum). There are no other permitted tour companies offering guided hikes in these areas. No financial transactions will take place on State or County property.

### C. Social Characteristics

This is a very private enterprise with little impact on the community. Most of the trails chosen are not heavily used by either tourists or locals. Except in parking areas, clients will have little contact with other people.

Dr. Berg has given natural history lectures to local organizations (e.g. Rotary Club) and more activities are planned for the future. He does volunteer work with the Kilauea National Wildlife Refuge and the Hawaiian Islands Humpback Whale National Marine Sanctuary (the waters off Kilauea lighthouse were designated as part of the HIHWNMS in 1994). He has also served as an officer on the board of directors of the Kilauea Neighborhood Association and 1000 Friends of Kauai. He is a member of Hui O Laka and the Kilauea Point Natural History Association.

### D. Environmental Characteristics

Environmental education is a major focus of these tours. Emphasis will be placed on teaching about the endangered nature of the species and the fragility of the environment. Hiking tours are designed to have the least impact on the environment and, with proper stewardship, can have beneficial affects (e.g. removal of litter, monitoring changes in the environment, increasing public awareness). Guided tours will be conducted along existing trails within State Forest Reserves and Koke'e State Park. These are all conservation zoned areas. There will be no collecting and no use of bicycles or motorized vehicles.

## 5. SUMMARY DESCRIPTION OF THE ENVIRONMENT:

The following is a list of the 13 trails in Hawaii State Forest Reserves and Koke'e State Park for which a permit is requested. Trail locations are marked on pertinent portions of the Department of Land and Natural Resources' Recreation Map for Kauai that have been photocopied and provided as Appendix 1. Trails are well marked and site locations can be derived from adjacent roads and features. Latitude and longitude may be derived from the original map. A complete description of plant communities may be found in the "Biological Survey for Koke'e and Waimea Canyon State Parks"

prepared by The Nature Conservancy of Hawaii for DLNR Division of State Parks, February 1990. cursory descriptions are found in the numerous trail hiking guides (e.g. *Kauai Hiking Trails*, *Hiking Kauai*, *Kauai Trails*). The Hawaiian Natural Community Classification described in Gagne and Cuddihy's chapter on vegetation in the *Manual of the Flowering Plants of Hawaii, Vol. 1* edited by Wagner, Herbst and Sohmer (1990) will be used herein to describe the plant communities associated with each trail and a complete listing of characteristic species can be found under that classification in the reference.

Na Pali - Kona Forest Reserve (Section I)

Awaawapuhi Trail

Nualolo Trail

Nualolo Cliff Trail

Na Pali - Kona Forest Preserve (Section II)

Alakai Swamp Trail

Pihea Trail

Kawaikoi Stream Trail

Kokee State Park

Halemanu - Kokee Trail

Nature Trail

Ditch Trail

Nounou Forest Reserve (Section IV)

Nounou Mountain Trails

Kuamoo-Nounou Trail

Lihue - Koloa Forest Reserve (Section V)

Kuilau-Ridge Trail

Halelea Forest Reserve (Section VI)

Powerline Trail

Awaawapuhi Trail. A Koa/'Ohi'a montane mesic forest, using the Hawaiian Natural Community Classification. At lower elevations the trail traverses 'A'ali'i' lowland dry shrubland. The State's Division of Forestry and Wildlife published the *'Awa'awa'puhi Botanical Trail Guide* (1988) which indicates some of the more interesting and/or common plants growing along the trail. There are no specimens of plants listed as threatened or endangered immediately adjacent to the trail (D. Lorence, pers. comm.) Native birds that might be encountered include: Pueo, 'Elepaio, 'Akeke'e, 'Anianiau, 'Amakihi, 'Apapane, and 'I'iwi, none of which are listed as threatened or endangered. The six critically endangered species: 'O'o'a'a, 'O'u, 'Akialoa, Nuku Pu'u, Kama'o, and Puaiohi are extremely rare or

extinct, and are not currently known from this area. The endangered Hawaiian hoary bat might occur in the area, but will not likely be seen because it is most active around sunset according to van Riper & van Riper III, 1982 in *A Field Guide to the Mammals in Hawaii*. Other mammals that might be observed, but are secretive, include deer, pig, goat and rat.

Nualolo and Nualolo Cliff trails. Essentially the same communities as the 'Awa'awa'puhi trail, as they are in the same area and are interconnected. This is Koa/'Ohi'a montane mesic forest and 'a'ali'i lowland dry shrubland. Iliau, a relative of the silversword, is found adjacent to the trails.

Alakai Swamp Trail. 'Ohi'a montane wet forest and a bog classified as 'Ohi'a montane wet mixed community describe this trail. Most native plants are endemics, but no threatened or endangered species of plants are immediately adjacent to the trail (D. Lorence, pers. comm.). Birds are abundant, with species as listed above, plus the possible addition of Kama'o, and 'Akikiki. The first two species are listed as endangered. Bats, pigs, and rats probably occur in this area. Portions of the trail are protected by a boardwalk.

Pihea Trail. Begins at the Pu'u o Kila lookout and follows along the rim of the Kalalau Valley as 'Ohi'a montane wet forest before dropping down toward the Alakai swamp. The Pihea trail crosses the Alakai Swamp trail and the plant community is better described as 'Ohi'a montane wet forest as it continues and connects with the Kawaikoi Stream Trail. The *Pihea Trail Plant Guide* produced by the State Department of Land and Natural Resources (1991) presents information of the native clubmosses, ferns, and flowering plants along the trail. The proposed endangered plant species *Alsinidendron viscosum* occurs just off the trail (D. Lorence, pers. comm.) This trail, along with the Alakai Swamp Trail, are the best trails for bird watching. The indigenous white-tailed tropic bird is often seen in Kalalau valley and the endemic forest birds are seen both on the ridge portion of the trail and as it progresses into the swamp. Mammals as mentioned above. Portions of the descent into the Alakai swamp have been fitted with stairs and boardwalk.

Kawaikoi Stream Trail. 'Ohi'a montane mesic forest except directly adjacent to the stream where ferns dominate. A grove of Japanese sugi cedars is in this area. Birds (as listed above) less common than on Pihea trail, but may also include the endangered Hawaiian duck,



Koloa Maoli and the Hawaiian coot, 'Alae Ke'oke'o. Mammals perhaps the same as mentioned above.

Halemanu - Kokee Trail. Disturbed Koa/'Ohi'a montane mesic forest with introduced grasses and blackberry in areas where trees were toppled by hurricanes 'Iwa and Iniki. Native birds as listed above, with none of the rare or endangered likely to be present. Because of nearby presence of cabins at both ends of the trails, rats and mice are more likely, goats and pigs less likely to be present.

Nature Trail. A 0.1 mile trail directly behind the Koke'e Natural History Museum that has been planted with native vegetation. A *Pocket Guide to Plants on the Nature Trail* was produced by the Museum and lists the plants marked along the trail. Endangered *Munroidendron racemosum* have been planted here. Native wildlife might include 'Elepaio, 'Anianiau, 'Amakihi, 'Apapane, 'Iwi and 'Akepa.

Ditch Trail. A trail made to maintain an irrigation ditch, mainly 'Ohi'a montane wet forest with numerous gulches and stream canyons containing ferns. The proposed endangered plant species *Alsinidendron lychnoides* occurs along one area of the trail (D. Lorence, pers. comm.) Native birds as listed above, with none of the rare or endangered likely to be present, except perhaps, the Hawaiian duck, Koloa Maoli. Mammals perhaps the same as on the Alakai Swamp Trail.

Nounou Mountain Trails. These trails pass east-west over Nounou Mountain in the Wailua area of eastern Kauai. Characterized as lowland Koa mesic forest, this area contains both native forests and forests of alien species (e.g. ironwood, guava, eucalyptus). The endangered *Munroidendron racemosum* and *Hibiscus clayi* occur off and along these trails (D. Lorence, pers. comm.). Native birds are unlikely in this area as it is surrounded by housing. A picnic area is provided.

Kuamoo-Nounou Trail. Essentially the same as the Nounou Mountain Trails. This trail enters from the south and is routed along the west side of the mountain through forests planted in the 1930's. It intersects with the west portion of the Nounou Mountain Trail.

Kuilau-Ridge Trail. This trail starts at the Keahua Forestry Arboretum and progress up along the ridge through introduced lowland mesic

forests. In gullies there is Hau and Kukui adjacent to the streams. U'luhe ferns cover the slopes. Introduced species are predominant along the trail itself, including casuarina, eucalyptus and guava.

Powerline Trail. The longest of the trails being considered, this 13 mile long trail starts at the Keahua Forestry Arboretum and proceeds as a dirt road north, through the Hallea Forest Reserve, to the north shore of Kauai near Princeville. Characterized as lowland mesic forests and montane mesic forest. The proposed endangered loulu palm *Pritchardia viscosa* occurs along this road (D. Lorence, pers. comm.) The area immediately adjoining the road is disturbed due to road construction and subsequent introduction of alien species.

## 6. IMPACTS, MITIGATION MEASURES, AND ALTERNATIVES

Hawaiian Wildlife Tours has been founded on the principles of ecotourism as defined in D.B.E.D.T. 12/94 *Ecotourism Opportunities for Hawaii's Visitor Industry*: "Ecotourism is nature-based travel to Hawaii's natural attractions to experience and study Hawaii's unique flora, fauna, and culture in a manner which is ecologically responsible, sustains the well-being of the local community, and is infused with the spirit of *aloha aina* (love of the land)". The tour program has been designed to impact the environment far within limits of acceptable change as may be defined by the Department of Land and Natural Resources (DLNR). No major impacts are expected.

Measures to reduce and mitigate the impact of this activity include the following: Limit the impact by taking only small groups of people (1-11 clients) only on established trails. Trails that are already too crowded, e.g. Kalalau and Hanakapiai, have not been selected for use. Tours will be infrequent, not to exceed an average of once a week on any one trail and averaging once a month per trail. Since most of the clients would probably be hiking on the trails un-guided, if tours were not offered, there will be no significant increase in trail use from this commercial activity.

There will be little impact to the environment. Clients will stay on the established trails and will be discouraged from enlarging the trail to by-pass muddy areas. No collecting will be permitted. No smoking of cigarettes and no fires will be permitted. No camping gear, climbing equipment, bicycles or motorized vehicles will be permitted.

No pets will be permitted. Before entering the trail, clothing and footing will be inspected and brushed clean to remove seeds of alien plant species and soil. Tours are of short duration and toilet facilities will be used before entering the trails.

Impact: The presence of people walking through the forests may disturb the wildlife and interfere with their feeding, mating, and the raising of young. Any responses to the presence of people might make the animals more vulnerable to predation. With rare and endangered species, these behavioral changes could lead to extinction.

Mitigation: Very few people will be taken on the trail at any one time and no trail will be used more than once a week. A sense of solitude will be honored and noise will be kept to a minimum in order to avoid disturbing the wildlife. These are not adventure tours. Since a major goal of these tours is to observe wildlife, clients must make their presence as unobtrusive as possible.

Impact: People walking through the forests could step on, break, or pick native vegetation, thereby harming the plant and causing its demise. This could lead to the death of the plant and even the extinction of the species. The loss of a plant species, if it served as sole food or shelter for a specific species of animal, could lead to the loss of that species. Similarly, the loss of a species of animal that serves to pollinate a specific plant, could lead to the extinction of that plant.

Mitigation: The few clients taken on these tours will stay on the established trails at all times and will be discouraged from enlarging the trail by by-passing muddy areas. No collecting will be permitted.

Impact: People walking through the forests could introduce alien plant and animal species to the fragile Hawaiian ecosystems that may feed upon, or compete with, native species, thus leading to their extinction. This could occur if the alien plant species is attached to clothing or footwear, or if the alien animal species (e.g. cats or dogs) follows the trail of the people into the forest.

Mitigation: Before entering the trail, clothing and footwear will be inspected and brushed clean to remove the seeds of alien plant species and soil. No pets will be allowed to accompany clients on the trail and only established trails will be used.

Impact: People walking on trails increase the physical wear on the trail, expose soil, and increase the effects of erosion. Larger impacted areas are often settled by alien species of plants that out-compete native species. Water-borne soil (mud) can smother plants and destroy aquatic ecosystems. In dry climates, air-borne soil (dust) can coat leaves, thereby decreasing the plant's photosynthetic capabilities, or coat flowers, thereby decreasing probability of reproductive success.

Mitigation: Few people will be taken on the tours and they will walk only on previously established trails. Many of these people would have hiked the trails un-guided, thus there will be very little increase in the number of people on the trails. Before entering the trail, clothing and footwear will be inspected and brushed clean to remove the seeds of alien plant species.

Impact: People walking in the forests can leave trash, garbage, and human wastes. Besides destroying aesthetic aspects of the environment, these wastes could smother natives species, carry pathogens, or feed vermin.

Mitigation: Clients will not be allowed to discard trash or garbage. In addition, trash and garbage will be removed from the trails as it is encountered and disposed of back home. Tours are of short duration and toilet facilities will be used before entering the trails.

Alternatives would be to limit all commercial tour activities to other combinations of trails, days or times, or number of people/group, depending upon perceived acceptable limits of change. This would require that DLNR monitor both activity levels and environmental change to objectively determine the proper balance.

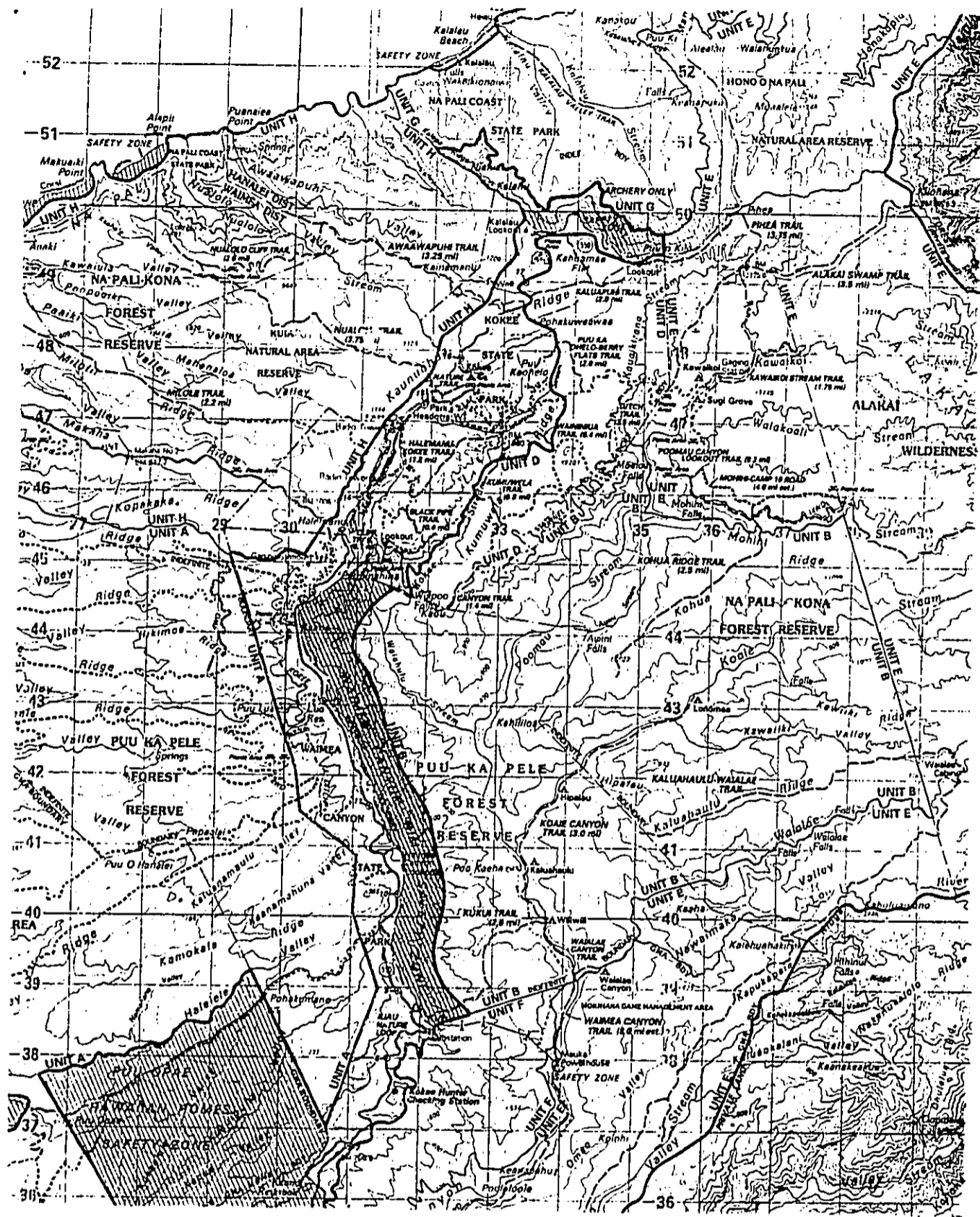
## 7. BENEFITS OF GUIDED TOURS

Positive benefits of these tours include: Removal of trash and garbage from the trails as it is encountered. Education of clients to the uniqueness of Kauai's species, habitats, communities and ecosystems and their fragility. Also, to instill a sense of *aloha aina* and *malama aina*. Hopefully the clients would be more sensitive to their impact on the environment during the remainder of their stay on Kauai and impact the island less.

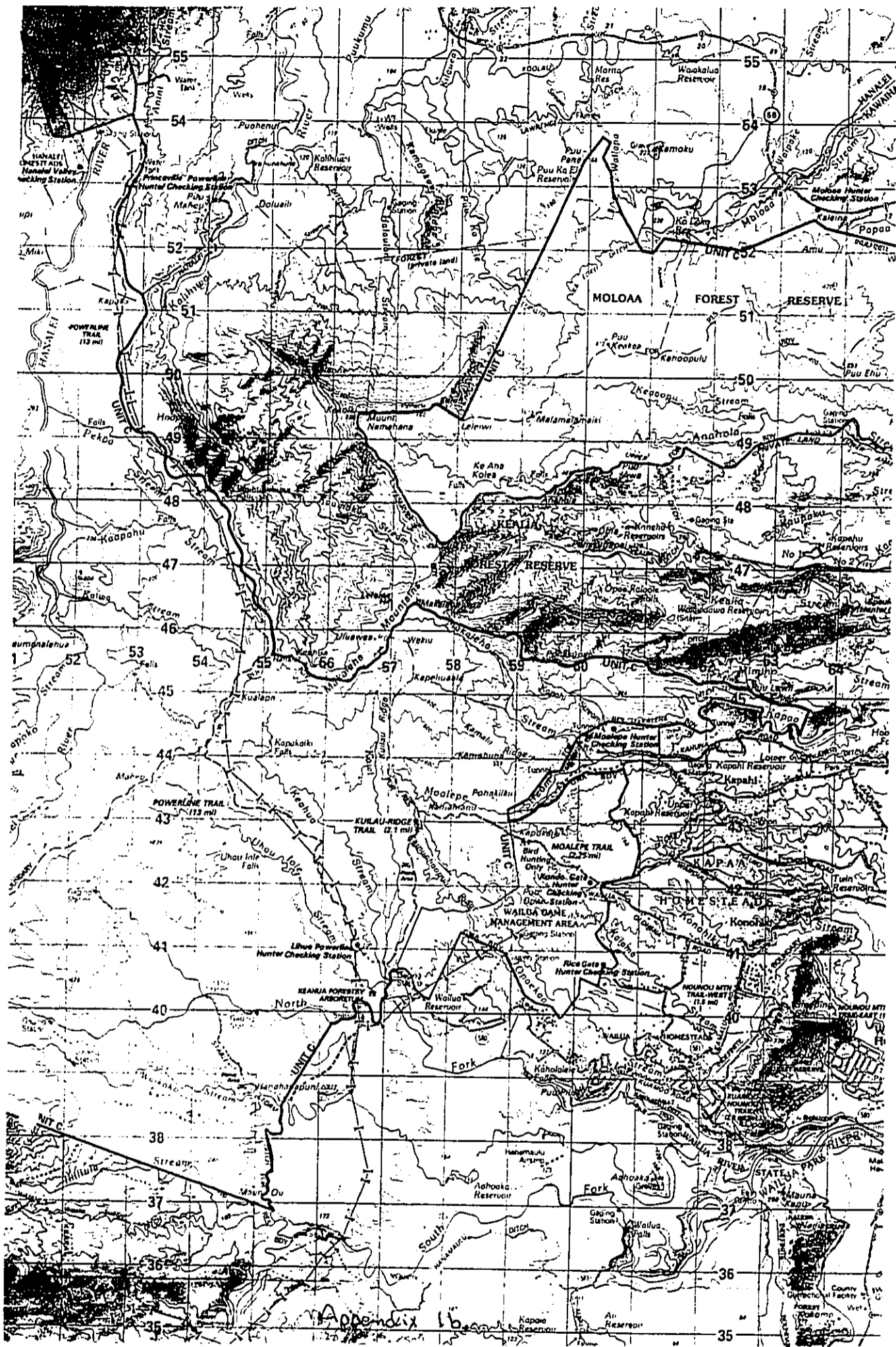
An active lookout for *Miconia* will be made during the tours and all sightings reported to DLNR. Notes will be kept of biological

observations and human use patterns which may aid DLNR research. If illegal activities or major environmental damage are observed, they will be reported to the DLNR Conservation Hotline as soon as possible.

Finally, Dr. Berg will work with DLNR Division of Forestry and Wildlife on Kauai to set up a program to periodically monitor environmental changes in selected areas using DLNR's standard monitoring transects. The purpose would be to gather information to determine, for example, the presence, abundance, and significance of exotic plants, or perhaps the impact of feral pigs on plants (browsing and digging). Clients or volunteers will be actively sought to participate in such programs.



Appendix 1a.





HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF FORESTRY AND WILDLIFE  
KAUAI DISTRICT  
3060 EIWA STREET, ROOM 306  
LILUOE, KAUAI, HAWAII 96756-1675

IN REPLY REFER TO

March 24, 1997

Dr. Carl J. Berg, Jr.  
Box 681  
Kilauea, HI 96754

Dear Dr. Berg:

Here are our comments as well as those received that pertain to your EA. As I have discussed with you in the past, the Department has also been working to standardize our policy and approach to commercial activities. A part of that has been the direction to come up with a list of trails and sites that we would consider for commercial activity. We have made such a list, and it has been reviewed by the Kauai Na Ala Hele Advisory Council. A copy is attached. For now, we will only consider commercial activity on listed trails, and under the conditions noted.

This addresses your intention to have your EA cover trails for future use, such as Makaleha. Because of our approach, we will not, at this time consider negative declarations for unlisted trails. You may want to consider refining your EA to address only listed trails.

**General comments:**

Trails to be used - please refer to the attached list of trails and general conditions that are being adopted by the District for Forest Reserve areas. At this time, we will only consider trails and use intensities on this list, as well as the conditions that accompany them.

Parking - We would be interested in your parking arrangements at trailheads. Please note parking concerns on our list.

**Specific Comments:**

Page 4 - Tour days - We would suggest that, for the Wailua area, tours not be done on Mondays as well as weekends and holidays, as Monday is a valid hunting day for Hunting Unit C.

Page 5 - Wastes - We would like it to be very clear that we don't want human waste disposed of in regular trash receptacles or, bag and all, dropped into our composting toilets. This material has to be disposed of in a manner consistent with sound health principles and



Dr. Carl Berg

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regulations.

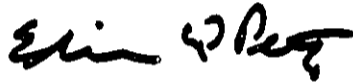
Page 5 - Emergency contact - As cellular phones do not have consistent coverage, what happens if an incident occurs in an area with no phone coverage, as is the case with most of the Kokee area?

Will there be only one guide that is trained in first aid and CPR? What happens if the guide is incapacitated?

Page 11 - In that a minimal impact assessment is being made on the contention that there will be no added impact because clients would be on the trails anyway, the applicant needs to support that with more justification and documentation. At present it is only an unsupported statement.

We would, of course, like copies of your correspondence with those that commented, and look forward to your revised EA.

Sincerely,



Edwin Q.P. Petteys  
Branch Manager

attachments - trail list, comments

General Conditions for Commercial Activities in Areas Under KDOFAW Jurisdiction:

1. Activities should take place during daylight hours on weekdays only. Exceptions may be considered on a case-by-case basis.
2. We will not consider allowing commercial camping at this time.
3. We will consider allowing a maximum of three companies to conduct tours on each road or trail or road/trail network on any given day.
4. We will allow one group per company per day on a given trail, road or road/trail network. Groups can have up to 10 people, including guides.
5. All litter and trash must be packed out and disposed of at an approved county trash transfer station. Trash receptacles presently on site are for general public use only.
6. Companies cannot erect or post any structures, tables, or facilities, signs, banners flyers, etc., temporary or permanent.
7. There is no obligation on our part to maintain trails for commercial activities.
8. Commercial operators do not have exclusive or preemptive rights to trails or facilities.

Acceptable Trails:

Name	Activity	Limitations
Nounou East	F	Parking in E. Lot only
Kuamoo	F,E,B	No parking at trail head. Drop-off/Pick-up only.
Kuilau	F,E,B	Parking for horse trailers, vans, vehicles carrying bikes at second lot in arboretum only. Car parking for foot travel at first lot in arboretum only.
Moalepe	F,E,B	No parking at trail head. Drop-off/Pick-up only.
Powerline	F,E,B	Vehicle parking at second lot in arboretum only.
Awaawapuhi	F	Parking at trail head lot only.
Nualolo	F	No parking at trail head. Drop-off/Pick-up only.
Nualolo Cliff	F	
Iliau Nature Loop	F	Parking only on paved shoulder w/DOT approval.
Kukui Trail	F	Parking only on paved shoulder w/DOT approval.
Pihea	F	Parking at Puu O Kila subject to State Parks approval.
Alakai Trail	F	Access from Pihea Trail only. No access from Camp 10 Road.
Kawaikoi Stream	F	Access from Pihea Trail only. No access from Camp 10 Road.

Activity Codes: F = Foot; E = Equestrian; B = Mountain Bicycles

March 20, 1997

#2

March 25, 1997

Dr. Carl Berg  
Hawaiian Wildlife Tours  
Box 681  
Kilauea, HI 96754

Dear Dr. Berg:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT FOR COMMERCIAL TOURS  
ON STATE LANDS ON KAUAI

We reviewed your proposal and have the following comments pertaining to Kokee State Park

- . The statement is made that only one vehicle will be used (p.5). It seems that at least two vehicles will be used since you and your clients will travel separately to the trailhead or designated parking lots.
- . All facilities to be used need to be identified and described. Our park facilities include paved roads, dirt roads, trails, parking lots, parking areas, restrooms, picnic pavillions, picnic shelters, picnic grounds, scenic lookouts, and scenic viewpoints. The description should include current conditions and levels of use.
- . All routes to be taken as a part of a tour need to be identified and assessed as a unit. e.g., Kokee-Halemanu Trail tour will begin where the vehicles are parked some distance from the trailhead.
- . The identification of jurisdiction is incomplete. Your listing on page 7 should be corrected to show that Pihea, Awaawapuhi and Nualolo Trails are also located in Kokee State Park.
- . Vegetation descriptions are inadequate. The plant that characterize these plant community (e.g. dominant and common species) should be identified. Reference to Biological Survey For Kokee and Waimea Canyon State Parks does not fulfill this requirement. This report is unavailable at this time - it is under review and has not been released to the public. (pp 6-9).
- . All trash are to be removed and properly disposed of outside our State parks.
- . One advantage of guided tours is that there is an identifiable person to be held accountable. As such, it is the tour guide who will be held responsible that all trash and human waste are properly disposed of.

Dr. Berg

-2-

03/25/97

- . Additional issues need to be discussed especially as related to cumulative impacts: 1) curtailing, limiting, or displacing public use of park facilities, 2) affecting the recreational experience of the general public, 3) requiring greater levels of repair and maintenance of park facilities, and 4) requiring additional improvements in the park.
- . Additional alternatives need to be considered. Only one alternative is given in the draft. The distinction given to this alternative is not valid since all trail uses will have to be monitored, whether guided or not. (p. 13)
- . All required permits and approvals need to be identified.
- . Statements are made that you do volunteer work for two Federal agencies and will also do volunteer work for the Division of Forestry and Wildlife. Are you also considering or willing to do volunteer work for our division?

If there are any questions on this matter, please call me at 274-3446.

Very truly yours,

*Wayne H. Souza*

WAYNE H. SOUZA  
Parks District Superintendent

cc: Lynn McCrory  
Ralston Nagata  
Edwin Petteys

#3

STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
HIGHWAYS DIVISION  
3060 EIWA STREET, ROOM 205  
LIHUE, HI 96766

MEMORANDUM

DATE: February 18, 1997 HWY-KE 4.970134  
TO: Forestry and Wildlife, Ed Petteys  
FROM: HWY-K *[Signature]*  
SUBJECT: Comments on conditions for commercial activities in areas under KDOFAW jurisdiction.

The areas of our concern are at the trail heads for Iliau Nature Loop and Kukui Trail. Both are at mile marker 8.7 on Kokee Road. The proposed condition is to permit parking on the paved shoulders.

The commercial activities proposed are not appropriate here without providing for safer parking areas. The road is narrow and curved through this stretch and there are inadequate paved shoulders for the proposed use. This will result in most vehicles parking on dirt shoulders. The paved shoulders can not be reserved just for commercial use. It would be unsafe to permit vans or busses to unload passengers or park on the existing shoulders. It is also quite possible that a van would arrive to find no parking available which might result in it stopping in the travel way to unload passengers.

Unless our concerns are satisfactorily addressed, we cannot approve the use of the shoulder for commercial parking.

If you have questions, please call Jim Turturici at 274-3111.

JT:es

DIV. OF FORESTRY & WILDLIFE-KAUAI

DATE REC'D FEB 19 1997		FILE REFERENCE:	
PETTEYS		INFO:	
KAWAKAMI		COM & RECOM.	
KOGA		APP ACTION	
KYONO		DRAFT REPLY	
NIHIMARA		POST BUL. BD.	
SAIPE		SEE ME	
WETA		XEROX	

#4

Ann Leighton, Chair  
Na Ala Hele Kauai  
c/o DOFAW Kauai  
3060 Eiwa St.  
Lihue, HI 96766

Ed Petteys  
DOFAW Kauai  
3060 Eiwa St.  
Lihue, HI 96766

Dear Ed,

The Kauai Council of Na Ala Hele (NAH) takes this opportunity to comment on the Environmental Assessments (EAs) submitted by Dr. Carl Berg and Mr. Lloyd Pratt for the purpose of obtaining permits for commercial guided hiking tours on state-managed lands on Kauai. Our comments will address general issues and then specific points on each EA.

Our general comments are as follows:

- \*As the proposed activities would be making money off of public resources, a distinction needs to be made between commercial operations and independent travelers.
- \*NAH should be provided with a copy of all future EAs and should have been consulted early in the drafting of the EAs as the Council might have been helpful to the applicants;
- \*Hikes should be limited to trails that have been approved by DOFAW and/or other appropriate DLNR divisions for commercial use. Trails should be used according to the limits set by these divisions and there should be no commercial use of trails on weekends or holidays;
- \*No volunteer service should be performed without a formal agreement with DOFAW and/or other DLNR divisions;
- \*No overnight camping should be permitted for commercial users;
- \*The consequences for violators of the terms and conditions of any use permits should be concise and significant, i.e., prohibition from obtaining any further commercial use permits for a specified period of time;
- \*Permits should be of short-term duration;
- \*Clients of each guided tour should wear some sort of identification to facilitate monitoring of use and enforcement (such as arm bands, buttons, hats, t-shirts, etc.);
- \*All commercial permittees should provide for the means of collection and proper disposal of solid human waste per Department of Health standards. No such waste or other litter shall be disposed of in state or park facilities: "Leave no trace" shall be the operational standard of all commercial ventures;
- \*A minimum of two persons conducting each hiking tour should be qualified in basic first aid and CPR. As a cellular telephone is inadequate for communication in

remote areas, each operator shall provide adequate plans for emergency communications.

With regards to Dr. Berg's submittal, our comments are as follows:

- \*Guided tours should be limited to 10 persons or less (including guides);
- \*Intensity should be limited to the use of one trail per month for guided hiking tours;
- \*Any other commercial activities - such as filming or photographing for movies and/or advertising - will require separate permits;
- \*Dr. Berg needs to further elaborate on his discussion of "alternatives."

With regards to Mr. Pratt's submittal, our comments are as follows:

- \*The documentation as submitted is difficult to follow and needs to be better organized. There is an excessive number of Summary Pages;
- \*The applicant repeatedly refers to information provided in his CDUA - but the CDUA is not attached to his EA (p. 24);
- \*Is the OCEA the accepting agency (p. 24)?
- \*The number of people on each guided tour should be limited to 10 (including guides);
- \*No plant name plates or any other kinds of identification shall be installed without the express approval of DOFAW or any other state agency (p. 18);
- \*No clearing, reforestation or other volunteer projects shall be done without the express approval of appropriate state agencies;
- \*The operator shall make every effort to be accurate in the presentation and dissemination of information to clients;
- \*Additional clarification and substantiation is necessary with regards to the applicant's activities of "education, visual inspection and/or observation...(monitoring and reporting and providing (for)...increased protection...for...Hawaii's rare, threatened, or endangered species and their habitat...(and)...an increase(d) level of protection for the...resources..."(pp. 16-17);
- \*While 'good intentions' are noble, NAH would like further elaboration on the applicant's assertion that "no mitigation is necessary" in spite of the activity's reliance on public facilities that were never designed and built for anything but recreational public utilization (p. 24);
- \*The applicant needs to substantiate the claim that the proposed action will not "substantially impact infrastructure"; for example, what about the introduction of noxious weeds on clients' clothing or foot wear (p. 27)?
- \*How will the proposed activity have a "positive cumulative effect on the environment" through information shared with DLNR (such as photographs and written reports, etc.) (p. 28)?
- \*What is meant by the statement that the project will "eliminate the present burden on educational infrastructure while providing a more viable means of education by

engaging recreationally for a first-hand physical experience of Hawaii's natural and cultural history." What educational infrastructure is being referred to and what other infrastructure is it "more viable" than (pp. 27-28)?

\*What is meant by the assertion that "the proposed project will enable appreciation of conservation lands that would otherwise have been 'off limits'?" (p. 26);

\*How will the proposed project "enhance the State's ability to...effectively protect and manage Hawaii's open and natural areas" (p. 26)?

\*NAH would like further explanation of the point-by-point alternatives in the EA. Rather than presenting distinct alternatives such as substantially reducing the use intensity or eliminating camping, it merely restates the project specifics (p. 23);

\*NAH would like substantiation of the awareness of and specific descriptions of plants and animal species to be found in the areas to be utilized for commercial guided tours (p. 20);

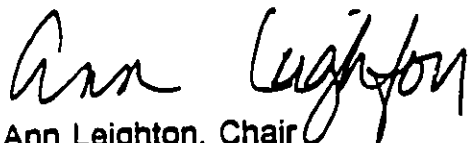
\*The applicant should verify trail milages (as the example of the Alakai Trail being 1.75 miles in length does not correspond with the attached maps or DOFAW figures);

\*NAH would like clarification on the applicant's statement that "(t)he proposed action will not substantially affect the economic or social welfare of the community or State. Rather, it will have a positive impact on both the economy and our society." (p. 27);

\*The applicant has provided correspondence from various consultants but needs to include his responses to the questions asked in those responses.

The Kauai Na Ala Hele Council appreciates this opportunity to review EAs that may have impacts on the Na Ala Hele program. If NAH can be of any further assistance, please contact us.

Very truly yours,



Ann Leighton, Chair  
Kauai Na Ala Hele Island Advisory Council

cc: File



# 5

HUI HO'OMALU I KA 'AINA

P.O. BOX 447  
HANALEI, HI  
96714

(808) 826-6898  
(808) 826-4182 9012  
(808) 806-7469 FAX 828-0426

Mar. 20, 1997.

Edwin Pettays

DLNE

Div. Forestry & Wildlife

Honolulu, HI

Fax #: 274-3438

Re: Application: Alanui O Kawai Nei Trails of Kawai  
and Hawaiian Wildlife Tours

Hui Ho'omalua I Ka 'Aina would like to support both applications with the following provisos.

- 1) Accurate place names be used in all activities and that true and traditional explanations and respect be given at all times.

Much of our people's cultural heritage is being lost solely as a result of "modern" names being used for locations and histories. Names are given for specific reasons and their use is an integral part of our past and present.

- 2) When requested by kumu or kupuna or specific konohiki, certain areas be avoided. Some popular sites for visiting are also sensitive cultural places that require our care and our reserved occasionally for our cultural uses.

If we can be of any assistance, please call:  
Jeff Chandler - 826-6295 or Makaala - 826-9012

Mahalo,

Makaala Brooks  
Via Chair



Kaua'i Group of the Hawai'i Chapter  
Post Office Box 3412  
Lihu'e, Kaua'i, Hawai'i 96766

# 6

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

**Re: Ecotourism ventures proposed for Kaua'i natural areas**

Dear Mr. Petteys,

On behalf of the Kaua'i Group of Sierra Club, several leaders and I have reviewed both of the draft environmental assessments relating to commercial hiking tours on Kauai's public lands and state parks. We offer the following comments and observations.

We first note that the two proposals are similar in their overall goals: to provide guided walking tours to educate and sensitize the client to pertinent natural, cultural and ecological factors along the lines of current "ecotourism" standards.

In the Alanui O Kaua'i Nei proposal by Mr. Pratt a broader scope of activity is described including overnight camping and offers of volunteer service toward park maintenance. In contrast, the proposal by Mr. Berg for Hawaiian Wildlife Tours appears more limited in its range of activities and geographical sites.

Regardless of the commercial aspects of these operations we wish to acknowledge and support the framework and justification that these operators bring to their ventures. It is no small irony that you have before you now these petitioners who willingly subscribe to numerous self limiting conditions for the benefit of the resource even while the very same public spaces are being overrun and despoiled by a consortium of alternately motivated profiteers; from poachers to illegal boaters to obtrusive helicopters. We welcome their willingness to come forward and to help fashion the regulatory environment that will ~~help~~ set a balance between the responsible use and enjoyment of our resources with their preservation and maintenance.

BENJAMIN J. CAYSTANO  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF STATE PARKS  
3080 EIWA STREET, ROOM 308  
LIHUE, KAUAI, HAWAII 96766-1875

March 9, 1997

MICHAEL D. WILSON  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
  
DEPUTY DIRECTOR  
GILBERT S. COLOMA-AGARAN

AQUACULTURE DEVELOPMENT  
PROGRAM  
AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
CONSERVATION AND  
ENVIRONMENTAL AFFAIRS  
CONSERVATION AND  
RESOURCES ENFORCEMENT  
CONVEYANCES  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND MANAGEMENT  
STATE PARKS  
WATER AND LAND DEVELOPMENT

TO: Edwin Petteys,  
Division of Forestry and Wildlife

FROM: Wayne H. Souza, Parks District Superintendent

SUBJECT: Hawaiian Wildlife Tours

We concur with the applicant's assessment for Findings of No Significant Impact as long as he is not planning to traverse the park dirt roads during rainy periods or when wet. The cumulative impact of ecotour companies driving on these roads under those conditions can severely erode the roadway.

Contrary to the statement made by the applicant, most of the parking lots in Kokee State Park are filled to capacity or have insufficient number of stalls during peak hours on sunny days. Puu o Kila Lookout parking lot is one of those lots.

Faye Road was not designed nor developed for shoulder parking.

The applicant raised several questions back to us from our comments. If the applicant had taken the time to sit down and discuss his proposal with us prior to the preparation of his DEA, this misunderstanding could have been minimized.

cc: Lynn McCrory  
Ralston Nagata

18 March, 1998

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 96754

Mr. Wayne Souza  
Division of State Parks  
Department of Land & Natural Resources  
3060 Eiwa Street, Room 306  
Lihue, HI 96766-1875

Dear Mr. Souza:

Enclosed is a copy of my letter to Mr. Petteys dated November 14, 1997 in which I responded directly to your comments (March 25, 1997) on my Draft Environmental Assessment. Mr Petteys provided you with a copy of my letter at the time of its submission. According to the copy of "A Guidebook for the Hawaii State Environmental Review Process - Appendix F" which was provided to me by the State Office of Environmental Quality Control, this was the appropriate means of response and it was accepted by Mr. Petteys. Now, four months after submission, I am told that I must respond directly to each of the groups or individuals that offered comments on my Draft Environmental Assessment, according to a new guidebook just received by DLNR. This letter and the enclosed copy of my response to all of those that made comments should meet the new technical aspect of that requirement.

I hope that you will work expeditiously with Mr. Petteys in submitting a final Environmental Assessment to the Office of Environmental Quality Control for a finding of no significant impact for my proposed activities.

I also would like to repeat my request to you for a limited time permit to use park facilities, as described in my environmental assessment, to go with the temporary permit already provided by DOFAW.

I would like to thank you again for commenting on my Draft Environmental Assessment and your support for the monitoring and management of the eco-tourism industry.

Sincerely,

  
Dr. Carl J. Berg, Jr.

CC: Petteys

**DIV. OF FORESTRY & WILDLIFE-KAUAI**

DATE REC'D		FILE REFERENCE	
MAR 18 1998			
PETTEYS		INFO	
KAWAKAMI		COM & RECOM	
KOGA		APP ACTION	
KYONO		DRAFT REPLY	
NISHIHARA		POST BUL BD	
PAPKE		SEE ME	
RIVERA		XEROX	
YELFER		Date Due	
KAIKAPU			
ECKART			

18 March, 1998

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 9675

State of Hawaii  
Department of Transportation  
Highways Division  
3060 Eiwa Street, Room 205  
Lihue, Kauai 96766

Dear Sirs,

Enclosed is a copy of my letter of November 14, 1997 to Mr. Edwin Petteys in which I responded to your comments (HWY-KE-4.970134) on my Draft Environmental Assessment for Hawaiian Wildlife Tours. According to the copy of "A Guidebook for the Hawaii State Environmental Review Process - Appendix F" which was provided to me by the State Office of Environmental Quality Control, this was the appropriate means of response and it was accepted by Mr. Petteys. Now, four months after submission, I am told that I must respond directly to each of the groups or individuals that offered comments on my Draft Environmental Assessment, according to a new guidebook just received by DLNR. This letter and the enclosed copy of my response to all of those that made comments should meet DLNR's requirements.

I would like to thank you again for commenting on my Draft Environmental Assessment and your support for the monitoring and management of the eco-tourism industry.

Sincerely,

  
Dr. Carl J. Berg, Jr.

cc: Petteys

HWY-KE 4.980248

March 19, 1998

Dr. Carl J. Berg, Jr.  
Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, Hawaii 96754

Dear Dr. Berg:

Subject: Hawaiian Wildlife Tours  
Draft Environmental Assessment

Receipt of your letter of March 18, 1998, together with attachments, is acknowledged.

As we have noted previously, the State Highways Division will not permit parking for commercial activities along the shoulders of Route 550, Waimea Canyon Drive (Kokee Road), in the vicinity of the Iliau Nature Loop and Kukui Trail areas.

However, since Item 3 of the attachments to your letter notes that the Iliau Nature Loop and Kukui Trail has been excluded from the Hawaiian Wildlife Tour's Draft Environmental Assessment activities list, we have no additional comments regarding the Draft Environmental Assessment for the project.

Please note that, in general, because of restricted roadway width and the numerous "blind" curves, the Highways Division will not permit parking for commercial activities along the shoulder areas of Route 550.

Dr. Carl J. Berg, Jr.  
Page 2  
March 19, 1998

HWY-KE 4.980248

Thank you for your letter and if you have any questions, please call Steve Morikawa at 274-3118.

Sincerely,



STEVEN KYONO, P.E.  
District Engineer

SM:es

cc: ✓ Mr. Ed Petteys,  
DLNR (Kauai District)

18 March, 1998

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 96754

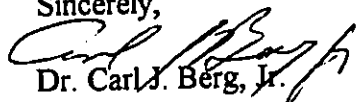
Ann Leighton, Chair  
Na Ala Hele Kauai  
c/o DOFAW Kauai  
3060 Eiwa St.  
Lihue, HI 96766

Dear Ms Leighton:

Enclosed is a copy of my letter of November 14, 1997 to Mr. Edwin Petteys in which I responded to your comments on my Draft Environmental Assessment for Hawaiian Wildlife Tours. According to the copy of "A Guidebook for the Hawaii State Environmental Review Process - Appendix F" which was provided to me by the State Office of Environmental Quality Control, this was the appropriate means of response and it was accepted by Mr. Petteys. Now, four months after submission, I am told that I must respond directly to each of the groups or individuals that offered comments on my Draft Environmental Assessment, according to a new guidebook just received by DLNR. This letter and the enclosed copy of my response to all of those that made comments should meet DLNR's requirements.

I would like to thank you again for commenting on my Draft Environmental Assessment and your support for the monitoring and management of the eco-tourism industry.

Sincerely,

  
Dr. Carl J. Berg, Jr.

cc: Petteys



18 March, 1998

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 96754

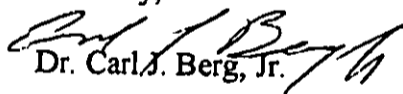
Sierra Club  
Kauai Group of the Hawaii Chapter  
P.O. Box 3412  
Lihue, Kauai 96766

Dear Sirs:

Enclosed is a copy of my letter of November 14, 1997 to Mr. Edwin Petteys in which I responded to your comments on my Draft Environmental Assessment for Hawaiian Wildlife Tours. According to the copy of "A Guidebook for the Hawaii State Environmental Review Process - Appendix F" which was provided to me by the State Office of Environmental Quality Control, this was the appropriate means of response and it was accepted by Mr. Petteys. Now, four months after submission, I am told that I must respond directly to each of the groups or individuals that offered comments on my Draft Environmental Assessment, according to a new guidebook just received by DLNR. This letter and the enclosed copy of my response to all of those that made comments should meet DLNR's requirements.

I would like to thank you again for commenting on my Draft Environmental Assessment and your support for the monitoring and management of the eco-tourism industry.

Sincerely,

  
Dr. Carl J. Berg, Jr.

cc: Petteys

18 March, 1998

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 9675

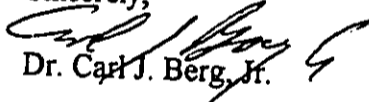
Hui Ho'omalua I Ka 'Aina  
P.O. Box 447  
Hanalei, HI 96714

Aloha,

Enclosed is a copy of my letter of November 14, 1997 to Mr. Edwin Petteys in which I responded to your comments (March 20, 1997) on my Draft Environmental Assessment for Hawaiian Wildlife Tours. According to the copy of "A Guidebook for the Hawaii State Environmental Review Process - Appendix F" which was provided to me by the State Office of Environmental Quality Control, this was the appropriate means of response and it was accepted by Mr. Petteys. Now, four months after submission, I am told that I must respond directly to each of the groups or individuals that offered comments on my Draft Environmental Assessment, according to a new guidebook just received by DLNR. This letter and the enclosed copy of my response to all of those that made comments should meet DLNR's requirements.

I would like to thank you again for commenting on my Draft Environmental Assessment and your support for the monitoring and management of the eco-tourism industry.

Sincerely,

  
Dr. Carl J. Berg, Jr.

cc: Petteys

18 March, 1998

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 96754

Mr. Frank Hay  
P.O. Box 9  
Kekaha, HI 96752

Dear Frank,

Enclosed is a copy of my letter of November 14, 1997 to Mr. Edwin Petteys in which I responded to your comments on my Draft Environmental Assessment for Hawaiian Wildlife Tours. According to the copy of "A Guidebook for the Hawaii State Environmental Review Process - Appendix F" which was provided to me by the State Office of Environmental Quality Control, this was the appropriate means of response and it was accepted by Mr. Petteys. Now, four months after submission, I am told that I must respond directly to each of the groups or individuals that offered comments on my Draft Environmental Assessment, according to a new guidebook just received by DLNR. This letter and the enclosed copy of my response to all of those that made comments should meet DLNR's requirements.

I would like to thank you again for commenting on my Draft Environmental Assessment and your support for the monitoring and management of the eco-tourism industry.

Sincerely,

  
Dr. Carl J. Berg, Jr.

cc: Petteys

18 March, 1998

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 96754

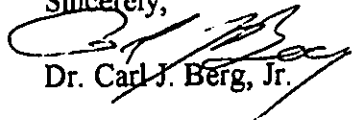
Mr. Fred Jager

Dear Fred,

Enclosed is a copy of my letter of November 14, 1997 to Mr. Edwin Petteys in which I responded to your comments on my Draft Environmental Assessment for Hawaiian Wildlife Tours. According to the copy of "A Guidebook for the Hawaii State Environmental Review Process - Appendix F" which was provided to me by the State Office of Environmental Quality Control, this was the appropriate means of response and it was accepted by Mr. Petteys. Now, four months after submission, I am told that I must respond directly to each of the groups or individuals that offered comments on my draft E.A., according to a new guidebook just received by DLNR. This letter and the enclosed copy of my response to all of those that made comments should meet DLNR's requirements.

I would like to thank you again for commenting on my Draft Environmental Assessment and your support for the monitoring and management of the eco-tourism industry.

Sincerely,

  
Dr. Carl J. Berg, Jr.

cc: Petteys

The long and growing popularity of Sierra Club's outings activities along similar lines attests to public interest and need for such programs. It is a shame that our state which depends so mightily on the tourist industry has not had the where-with-all to adequately meet this need within its own parks department. We think it is valid to argue that the experience to be gained through a controlled and monitored interpretive program as are being proposed here should not only prove to be more personally rewarding but should account for less damaging impacts to the environment than might otherwise occur on an unguided venture by the same client.

In sum, we heartily agree with the philosophy of hierarchical usage which sets the preservation and health of the natural resource as a top priority, the public's use and enjoyment as secondary and the commercial use as last and only if its accommodation can be made without further detriment to the resource. We also recognize the importance of educating the public at every opportunity to become better stewards of our precious public domain. Education is our best long term prospect to protect our lands from either the pernicious effects of rampant commercialism or the unintended consequences of too many individuals "loving our parks to death". If someone on Kaua'i can combine the elements of education, appreciation and recreation and still make a buck in the process we think it is worth a try.

Very Truly Yours,



Rob Culbertson  
Chair, Kaua'i Group  
Hawaii Chapter Sierra Club

Frank O. Hay

P.O. Box 9, Kekaha, Kauai, Hawaii 96752-0009

Management Consulting \* Project Management fhay@aloha.net Voice 1.808.826.1704 Fax 1.808.826.1774

March 24, 1997

Carl J. Berg, Jr., Ph.D.  
Hawaiian Wildlife Tours  
P. O. Box 681  
Kilauea, Kauai, Hawaii 96754

Lloyd Imuaikaika Pratt  
Alanui O Kaua'i Nei  
P. O. Box 82  
Makaweli, Kauai, Hawaii 96769

DIV. OF FORESTRY & WILDLIFE

DATE RECD	FILE REFERENCE
MAY 22 1997	
PETTY'S	INFO:
	COM & RECOM.
	APP ACTION
	DRAFT REPLY
	POST MAIL ON

Re: Environmental Assessment  
Proposed Educational Hiking Tours

Gentlemen,

I have reviewed the environmental assessments which you have prepared in support of your proposed educational hiking tours. I applaud your efforts and congratulate you on your ambition. This is the type of personal contact which, to me, truly demonstrates the "Aloha Spirit."

As a Hawaii resident for over thirty years, I have been proud to host many guests to our fair islands, both official visitors -- guests of the U.S. Department of State, the Agency for International Development, and other agencies -- as well as unofficial visitors or tourists.

Like you, I have had great pleasure in conducting many of my guests on hikes in the native forests. Some of the most memorable occasions in my entire Hawaii experience have been hiking in those forests and the mountains, and sharing what little knowledge I have gained through my studies with my visitors. I have made many lasting friends in this process, as I am sure you have and will.

From my experience of tourism, I find that many visitors to the islands come away with but slight knowledge of what Hawaii is really all about. It is much more than luxury hotels, beautiful beaches, and shell leis -- but few have the opportunity to learn anything more, or to have a conversation with a resident, other than to order a meal or a drink. Their experience is diminished as a result, and the impression of Hawaii they could potentially go away with is lessened.

The experience you offer is extremely valuable, in that you become a de facto ambassador of Hawaii, representing the best of our fair islands to visitors who are interested and receptive. This type of contact is rare and much appreciated in any country.

MAF-24-1997 15:37

ULTI + ASSOCIATES

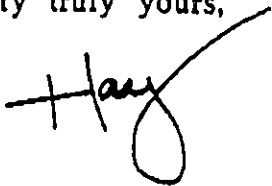
808 338 1774 P.02

Carl J. Berg, Jr., Ph.D.  
Lloyd Imuaikaika Pratt  
March 24, 1997

Finally I would like to comment on a proposed fee. What you propose to do is no more than any island resident with his guests, except that you have the great fortune to be hiking more frequently. A simple license is all that should be required, perhaps to cost a token \$100 per annum. Like any businessman, your firms are subject to all applicable State and Federal excise and income taxes, as well as licensing requirements. Your impact on the highways and trails will be minimal -- no more than any school group, or any other small group -- and the proposed fee should reflect that. In addition, the insurance coverage required by the State should adequately protect both you and the State of Hawaii or any private landowner.

Once again, I congratulate you on your efforts. Happy hiking!

Very truly yours,



cc: Office of Environmental Quality Control, State of Hawaii  
3877

# 8

Via Facsimile 808-274-3438

February 28, 1997

Department of Land and Natural Resources  
Division of Forestry and Wildlife  
c/o Edwin Petteys  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

Re: Draft Environmental Assessments for Alanui O Kauai Nei Trails of Kauai and  
Hawaiian Wildlife Tours

Mr. Petteys :

I am responding to the above and the article in the February 23, 1997 Office of  
Environmental Quality Control ( OEQC ) Bulletin .

First , I am acquainted with both gentlemen that are requesting to provide an  
" Ecotourism " experience for our visitors and residents , and I do not question their  
sincerity in the mitigation of any adverse environmental impact . I have no doubt that  
the " Ecotourism " experience would enhance our tourism industry .

My concern is , it appears the State is entering into another Commercialization Project  
of our Natural Resources and has not established any bench marks on carrying  
capacity or rules . We are currently experiencing problems at all our harbors and rivers  
that I would attribute to this same lack of foresight and planning .

Before we create another problem , I believe the State should condition any  
application for this proposed venture with the adoption of a plan to control the venture .  
All we need is another Commercial / Local use conflict to resolve .

In closing , if this venture could be limited to the two companies that are currently  
applying , I would not foresee a problem . But in our free enterprise system how do you  
limit something with out a plan?

Sincerely ,



Fred Jager

cc: OEQC c/o Gary Gill - Fax 808-586-4186



November 14, 1997

Hawaiian Wildlife Tours  
P.O. Box 681  
Kilauea, HI 96754

Mr. Edwin Q.P. Petteys  
Hawaii Dept. Land & Natural Resources  
Division of Forestry & Wildlife  
3060 Eiwa Street, Room 306  
Lihue, HI 96766-1875

Dear Mr. Petteys:

Thank you for your assistance in forwarding the written comments on my Draft Environmental Assessment. I have carefully reviewed all the letters that were submitted and would like to address them as part of my submission of the Environmental Assessment (EA) for Hawaiian Wildlife Tours. I have modified my EA in response to the suggestions in those letters, but primarily to conform to the "Approval of Process for Commercial Hiking Ventures on Select Public Trails, Division of Forestry and Wildlife, Na Ala Hele Trail and Access Program" which was passed by the Board of Land and Natural Resources (BLNR) at their October 10, 1997 meeting (Appendix 2). Copies of the letters are attached and they will be discussed in the following order: 1) Division of Forestry & Wildlife, 2) Division of State Parks, 3) Department of Transportation, 4) Na Ala Hele, 5) Hui Ho'omalu I Ka 'Aina, 6) Sierra Club, 7) Mr. Frank Hay, 8) Mr. Fred Jager.

1) With respect to your letter of March 24, 1997:

General Comments.

Trails to be used and general conditions of use: The 13 trails listed in your letter are the same as those approved by the BLNR. Therefore, I omit from my EA those trails not on your list (the Po'omau Canyon Lookout Trail, the Keahua Forestry Arboretum, Makaleha Stream Trail, and Hanalei River Trail). I still retain those trails under jurisdiction of the Division of State Parks. i.e., the Halemanu-Koke'e Trail, the Ditch Trail and the Nature Trail, or under joint jurisdiction, e.g. Pihea, Awaawapuhi, and Nualolo Trails (as per attached letter of Wayne H. Souza, March 25, 1997 and personal communication). The general conditions and access limitations in your letter and those of the BLNR are comparable and both will be strictly adhered to. The maximum size of my group will now be limited to 12 individuals, including guides, as per the BLNR conditions. Since I will offer custom tours, they will normally consist of only one or two clients and myself. No commercial hiking activity will

be done on holidays or weekends, unless this limitation is subsequently changed by the DLNR.

Parking: The limitations listed in your letter will be adhered to. I hope to purchase a vehicle to transport clients. Until that time, they will be met at the northern end of the parking area at the Meadows in Koke'e State Park and only one car will be taken to the approved parking site near the trailhead.

Specific Comments:

Page 4. Four days. Since the public is not prohibited from Hunting Unit C on Mondays, it does not seem just to exclude commercial hiking activity, but I will refrain from entering Hunting Unit C. This allows hiking on a portion of the Moalepe Trail, but closes the remainder of the trail and both the Kuilau and Powerline Trails on Mondays.

Page 5. Wastes. Trash and human wastes will be disposed of outside of State Lands by the client in a manner consistent with sound health principle and regulations. With pre-hike precautionary warnings and procedures, this is not a problem for my hikes which will be of relatively short duration.

Page 5. Emergency Contact. If an incident occurs in an area of no cellular phone coverage, then someone will be sent with the cellular phone to an area of coverage, to the nearest telephone, or to get emergency assistance directly. Normal pre-hike instructions would include procedures to be followed in the case of the guide being injured. By usually taking only 1 or 2 clients, the cost of a second guide is prohibitive. Many of the clients are medically trained.

Page 11. The DLNR has no complete statistics on the number of hikers using the approved trails, the percent accompanied by guides, the percent that are local versus tourists, or the change in trail usage on weekends or holidays versus weekdays. In my capacity as a volunteer trail guide at the Kilauea Point National Wildlife Refuge, I survey an average of 15 hikers each week. I am told that most hiking on State trails is done without guides, i.e. they will hike the trails anyway. With all the limitations being imposed by the DLNR, there cannot be a significant increase in guided trail usage, but that is what DLNR's monitoring program will determine. Until these data are collected, it is my unsupported belief that the ecotourism industry will not significantly increase the actual number of people on the trails, but will appreciably decrease their impact.

2) Responses to letter from Wayne H. Souza, Kauai Parks District Superintendent, dated March 25, 1997.  
Paragraph 1. I hope to provide transportation for the clients from their residence, but this will require the purchase of a new vehicle, special insurance, and a PUC license. Until then, clients will be met at the northern end of the parking

area at the Meadows in Koke'e State Park and one car used to go to the trailhead, as necessary.

Paragraph 2. Waimea Canyon Road (Highway 550) will be used to reach the parking area at the Meadows in Koke'e State Park. This road is well paved and under moderate use. Cars will be parked at the northern end of the paved parking lot and a single car used to reach the parking areas for the Pihea Trail and the Awaawapuhi Trail. The Nualolo Trail and Nature Trail will be reached by foot from the parking area. The Koke'e-Halemanu Trail is accessed by Faye Road. Depending on the car used and road conditions, clients will be dropped off at either the intersection with Highway 550 or Halemanu Road. The car will be parked off Highway 550 on Faye Road. The hike leads to Faye Rd. via an unnamed short trail to Halemanu Rd., to the Halemanu-Koke'e Trail, to Camp 10 Road and then back to the Meadows parking lot. The car left at Faye Rd will then be retrieved. Ditch Trail is accessed by that portion of Camp 10 Road within State Park boundaries. This road can only be used by four-wheel-drive vehicles and is currently being repaired. Restroom facilities at the Meadows will be used before and after hikes. These are in good working condition and under moderate use. The short portion of Pihea, Awaawapuhi, and Nualolo Trails under the Division of State Parks will be used to reach the main portions of those trails and also to access the Alakai Swamp Trail and Kawaikoi Stream Trail. Those portions are in good condition. The Pihea trail is moderately used, whereas the others are only lightly used. From my observations, the roads and parking areas within the Waimea Canyon and Koke'e State Parks are generally in good condition and not heavily used. The parking area at Puu o Kila is seldom full, but is in need of repair. The parking area for the Awaawapuhi Trail is not fully paved, but the cleared area is adequate for its usage.

Paragraph 3. See the response in the General Comments section of the letter from Mr. Petteys for further clarification.

Paragraph 4. The Hawaiian Natural Community Classification described in Gagne and Cuddihy's chapter on vegetation in the *Manual of the Flowering Plants of Hawaii, Vol. 1* edited by Wagner, Herbst and Sohmer (1990) was used to define the plant communities associated with each trail and a complete listing of characteristic species can be found under that classification in the reference. The plant that characterizes these communities (e.g. Koa/'Ohi'a) was given for each trail. In addition, the "Biological Survey for Koke'e and Waimea Canyon State Parks" is now available in the public domain. Extensive descriptions of the habitat for the trails are included therein and it serves no purpose to simply duplicate everything here.

Paragraphs 5 & 6. All trash and wastes will be removed from State lands (see response above to "Page 5" section of the letter from Mr. Petteys).

Paragraph 7. Cumulative impacts: With the extreme limitations placed upon the commercial hiking industry by the BLNR (e.g., group size <12 people, < 5 days/week, few companies being permitted) and the monitoring being done by State personnel for potential impacts, and the State's ability to terminate the permit "at any time upon the determination of unacceptable negative impacts associated with the activity"; then cumulative impacts should be negligible, well monitored, and controlled by the permit process. The State is thereby required to monitor all aspects mentioned in the items you listed. 1) If public use of park facilities is concentrated on weekends, then there should be no cumulative impact since commercial activities are not permitted. If it is not, then the restriction should be dropped and overall levels of activity monitored. 2) It is the general public (resident & non-resident) that is hiring the ecotourism companies to improve their recreational experience. The low levels of permitted commercial activity should have no cumulative impacts. 3 & 4) These assume that permitted commercial activities will increase the wear of the facilities. There is no evidence that it will. Numbers of vehicles in the parking lots may decrease if clients are brought together in cars or vans. Groups under tour-guide supervision will be less destructive of park facilities. I see no need for improvements.

Paragraph 8. The alternatives provided in the EA were given in a matrix/factorial conceptual design of three parameters (trails x time x # people). The impact is nil if any one of these factors is zero. There are many alternative combinations. The BLNR has decreed its preferred alternative by defining the trails to be used, the days of operation, and the maximum number of people per tour. In addition, the number of permits awarded will be limited. The BLNR has ascertained that under those restrictions commercial hiking activities "may have little or no discernible negative impact upon the resource or the local community". My proposed activity will serve mainly couples, having much less impact than groups of twelve. If permits are awarded solely to those companies normally taking only couples or families, the cumulative impact would be even less than what is possible now. According to the BLNR, it is incumbent upon the State "to monitor the selected trails for potential impacts".

Paragraph 9. It appears that the permit and approval process has been determined by the BLNR for trails within the jurisdiction of the DOFAW. I assume that the Division of State Parks would need to give approval for the use of trails and facilities under its jurisdiction, although no procedure or application form has been given to me. A Finding Of No

Significant Impact on this EA would be submitted as part of any such application. I know of no other requirements.

Paragraph 10. This does not seem directly relevant to a Finding Of No Significant Impact on my EA. Is this a permit requirement? Does the DOSP have an organized volunteer program? If, so I might consider doing volunteer work for each division proportional to the amount of time spent on trails in each ones jurisdiction. Or perhaps, since I am a professional aquatic biologist by training, it would make optimum use of my talents if I volunteered for the Division of Aquatic Resources.

3). Response to letter from the Department of Transportation dated February 18, 1997 (HWY-KE4.970134).

Although the Iliau Nature Loop and Kukui Trail were approved by the BLNR for use, I did not include them in my Draft Environmental Assessment because of concerns expressed by the DOT in my consultations with them. Until such time as adequate parking is provided, I will not use these trails for commercial activities.

4). Response to letter of Ann Leighton, Chair of Kauai Na Ala Hele Island Advisory Council.

General Comments: Most of these issues have been addressed by the BLNR in their "Approval Process..." which Na Ala Hele helped develop.

I find it offensive that clients be required to wear some sort of identification. With so few tour guides to be permitted, enforcement officers will easily identify commercial activities.

The disposal of trash and wastes is discussed in above letters to Mr. Petteys and Mr. Souza.

With small tour companies and small groups (e.g. couples) the norm, it is not realistic to require that a minimum of two guides be present. All guides should hold valid certificates of training in Emergency First Aid and CPR. See response to letter by Mr. Petteys concerning emergency communications.

Comments Specific to my EA: The BLNR has decided to limit tours to 12 persons (including guides) but my business will be directed to custom tours of usually 1 or 2 clients.

Intensity of use has not been limited by the BLNR. No commercial venture could survive if limited to one trail per month.

Other commercial activities were addressed on page 4 of my EA.

I wish Ms Leighton was more specific concerning "alternatives". See my response, above, to Mr. Souza's Paragraph 8.

5). Response to letter from Hui Ho'omalua I Ka 'Aina dated Mar. 20, 1997.

I thank them for their support and fully agree with the use of true and traditional names and explanations. I will respect their requests concerning specific cultural sites.

6). Response to the letter from Rob Culbertson, Chair, Kaua'i Group of Hawaii Chapter of the Sierra Club.

I appreciate the Sierra Club's support for my venture and commend them for their support for the hierarchical usage of our State's resources, and for environmental education "to protect our lands from either the pernicious effects of rampant commercialism or the unintended consequences of too many individuals loving our park to death".

7). Response to letter from Frank O. Hay dated March 24, 1997.

I thank Mr. Hay for his support and agree with him that, as proposed within the EA, my commercial activities will have minimal impact on the trails and infrastructure. A license fee should be required of all commercial activities using public resources.

8). Response to letter from Fred Jager dated February 28, 1997.

The BLNR "Approval Process..." appears to address Mr. Jager's general concerns, but not those about establishing benchmarks for carrying capacity or rules. The BLNR did establish means for controlling the industry.

I believe that I have addressed all the comments contained within written responses to my Draft Environmental Assessment and ask that you now submit this revised Environmental Assessment for a Finding Of No Significant Impact.

Thank you for all of your help and encouragement with this process.

Sincerely,

*Dr. Carl J. Berg*