

University of Hawaii at Manoa

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> August 3, 1992 RG:0110

Mr. Harold S. Masumoto Office of State Planning P.O. Box 3540 Honolulu, Hawaii 96811-3540

Dear Mr. Masumoto:

Draft State Land Use District Boundary Review Kauai

The referenced Draft Report addresses the Kauai County recommendations for the State Land Use District Boundary Review. This review is a comprehensive, statewide evaluation of land use district boundaries.

The Environmental Center reviewed this draft report with the assistance of Mike Kido, UH Environmental Researcher, Kauai; James Parrish, Hawaii Cooperative Fishery Research Unit; and Bill Cameron, Environmental Center.

Overall, the Office of State Planning should be commended for an excellent effort in developing the document. This boundary review places high priority on the protection of Hawaii's conservation resources including watersheds, habitats for rare and endangered species, wetlands, special streams, and coastal/scenic resources. Favorable action on these recommendations will also protect biological, cultural, and social resources for future generations.

Our particular concerns with regards to the proposed changes are Infrastructure Issues, Agricultural Lands, and Native Ecosystems and Rare Species.

Infrastructure Issues

 The deficit in urban lands for predicted growth is logically directed toward the Lihue-Hanamaulu area, however, both water shortages and wastewater treatment needs in the area are not adequately addressed, especially given current applications by the Westin for expansion of the existing hotel. Mr. Masumoto August 3, 1992 Page 2

- 2. Water needs islandwide, particularly in regard to areas where increased urbanization is being directed (Kukuiula and Hanamaulu), should be analyzed more carefully. Nine new wells are planned for Kauai, but data on impacts on the total potable water resource if all the wells are drawing at capacity are unknown.
- 3. Neither methods of discharging increased levels of wastewater effluent nor their potential impact on nearshore ecosystems are addressed.

Agricultura! Lands

- 1. We feel that inventories of agricultural lands (especially class A & B) should be maintained at present levels on Kauai to provide for potential future diversified agriculture ventures.
- 2. Reclassification of 800 acres from agriculture to urban in Kukuiula would remove high quality agricultural lands from the inventory. We recommend that this total acreage be reduced, and that an incremental allotment be allowed to more reasonably reflect a balance between urban growth and loss of prime agricultural lands in the area.

Native Ecosystems and Rare Species

- 1. We concur with the assessments of biological resources in table 12, except for the following areas:
 - a. Kiahuna Golf Course: The undeveloped area mauka of the present highway is perhaps the most archaeologically rich site remaining on the leeward coast of Kauai. In addition, unique cave ecosystems with endemic blind spiders and amphipods are found in the area. We recommend this area (and a buffer zone) be placed in conservation classification, and that recovery and preservation plans be developed for the resource.
 - b. Koloa Caves: As with the Kiahuna site, reconnaissance by scientists within the last two years has substantiated the existence of stable populations of endemic cave fauna in the area. Due to the urbanization of Kuikuiula and threats from agricultural activity in the area, it is recommended that conservation status be given to the lands that encompass the resource. It is critical that sufficient "above ground" area be protected (with buffer zone), as roots from vegetation are essential to the survival of the animals. Replanting the above ground sites with suitable vegetation should be part of the stabilization plan for the resource.

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- c. Olokele Valley and Puu Opae: Both leeward sites provide excellent biological habitat for native species, and conservation classification is recommended.
- d. Waimea/ Makaweli River: Very large spawning populations of Oop'u nakea were observed in the 1991 season, indicating thriving populations of endemic gobies in the system. We recommend conservation classification for the river with a minimum of 100 foot buffer zones for the main channels and all tributaries.
- 2. Assessment of Wetlands: We agree with the recommendations, except for the following area:
 - a. Puu Poa Wetlands: Provides an important habitat for endangered waterbirds, therefore conservation classification (priority 1) is recommended.
- 3. Special streams: As all native freshwater macrofauna are amphidromous, we recommend a minimum of 100 foot corridors for the entire length of all high quality streams (including seaward portions) in order to provide maximum protection for the resource. "Ridge to Ridge" conservation zones should be applied to all high quality stream systems. We, therefore, disagree with the recommendations for Wainiha, Hanapepe, and Waimea rivers where we feel protection corridors are warranted.

Priorities

We concur with Priority 1 recommendations for reclassification action listed on page 83; however, several areas listed as Priority 2 should be upgraded, as these areas encompass outstanding resources under immediate threat from human induced activities.

We recommend that the following be given Priority 1 status:

- 1. Donkey Beach
- 2. Kapaa Stream
- 3. Mahaulepu Coastline
- 4. Kilauea Stream
- 5. Wainiha Streams

We also have concerns with regards to existing uses on agriculture land (taro farming) that will be reclassified to conservation lands. In particular, current landowners

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whose land is reclassified may be subjected to extensive permitting processes that may cause unnecessary hardships. Discussion of secondary impacts to landowners should be included in the boundary review.

Thank you for the opportunity to comment on this document. If you have any questions or concerns, please do not hesitate to call.

John T. Harrison, Ph.D.

Environmental Coordinator

cc: OEQC

Roger Fujioka Mike Kido James Parrish Bill Cameron