January 4, 1985

Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Sir:

1) Proposed Amendments to the General Plan
2) Proposed Development Plan Ordinance and Maps

Covering the Northwestern Hawaiian Islands and Other Islands in the City and County of Honolulu

Your letter of November 30, 1984 to the Hawaii Environmental Simulation Laboratory (HESL) was forwarded to our office. HESL was dissolved several years ago at the completion of its Ford Foundation and National Science Foundation grants. Since then requests for HESL services have been responded to, when they do not require additional funds, by the Environmental Center.

The proposed amendments to the City's General Plan which would clarify the City and County's interest and legal responsibilities with regard to the Northwestern Hawaiian Islands and other islands in the City and County of Honolulu seem reasonable and appropriate.

The often discussed establishment of a fishery support base in the NWHI has been a topic of concern for our reviewers for the past several years. We note that environmental preservation and protection are identified along with economic development as the City's primary interests in the islands. These are mutually conflicting goals whose implementation is unlikely to be achieved without some loss to one side or the other. It is our understanding that economic development in terms of the increase in commercial fishing that would be stimulated by shore-based fishery-support facilities not only would presumably increase the fishing pressure near the islands by could also have deleterious effects on the seabird and marine mammal communities that frequent the islands. Because many of these communities represent assemblages of animals of rare or endangered status, extreme caution is advised in developing management practices particularly where commercial exploitation of the natural resources is involved. The addition of specific recognition of the City's role in the NWHI and Oahu's offshore islands in the General Plan should augment and expand existing controls for these islands.

AN EQUAL OPPORTUNITY EMPLOYER
We appreciate the opportunity to offer our comments on this matter.

Yours truly,

Doak C. Cox
Director

cc: OEQC
Jacquelin Miller