

Hula Kai

Kona Sunrise Charters, Inc.

Testimony
DOBOR
Manta Proposed Administrative Rules

Chair Suzanne Case
Board of Land and Natural Resources
1151 Punchbowl St. Room 131
Honolulu, HI

October 10, 2018

Thank you for the opportunity to comment on these proposed rules to manage the manta viewing commercial use. Our company Kona Sunrise Charters Inc. runs the vessel Hula Kai that has been running commercial manta tours 5-7 nights weekly since 2007.

Page 27, 2) iv, Page 30,1)

The “campfire” lighting rule in Kaukalaelae Point will be a very different process for all of the current vessels. This sight is at an open point area not like the cove shape area of Makako Bay. Currently each individual vessel has their own floats that contain lights and is a flotation device for the participants. As the ocean current changes each night and often throughout the night, this allows for some adjustments to where the mantas are actually feeding. Once vessels are no longer drifting this will be a safer area for snorkelers as they are at fixed moorings. The Kaukalaelae Point area ocean floor is full of boulders and not an open sandy area as is Makako Bay. These two locations are very different.

Page 29 2.ii)

Replacing or substituting a permitted vessel once in a 90-day period, needs to be clarified. We have dry-dock that can run for up to 4 weeks sometimes. This year we are out of service for 4 weeks, typically it is 2-3 weeks every year. The word “once” in 90 days is not clear.

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The standard PADI snorkeler/trained-guide ratio is 10-1. This should be changed to ten passengers per trained lifeguard or dive master as these snorkelers are holding onto a lit-float that is tethered to the vessel. The professional dive industry recognizes the 10-1 ratio as a safe number when the guide is a professionally trained guide.

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5(H) Manta safety protocol, snorkeler safety and safe boat maneuvering are crucial at the manta sites. We are in desperate need for DOCARE to be actively monitoring this activity. While the Manta Observer Program may be a good step in monitoring behaviors, it does not replace the value of well-trained DOCARE officers periodically observing as well.

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Page 35, 4, (b)

The number of 30 permits is too many for the Kaukalaelae Point area. If this plan is laid out for 30 moorings there will be some put in very deep water, too deep for enjoyable snorkeling with the mantas as we have stated in letters previously sent. If it's not out in deep water, then it would be too close to shore when the weather and surf is rough. Fitting 30 moorings is not advised. This location is a point that has no protection from surf, many winter nights are not safe to run manta tours.

We would appreciate the consideration of a 2- point mooring for the larger vessels at Kaukalaelae Point and we are willing to pay the costs incurred for the additional mooring we would be assigned if we were to receive a 2- point mooring.

Thank you for moving forward with public hearings and offering opportunities for improvement to these rules. We are hopeful for changes that will strengthen our industry in managing these important sites to make safe viewing for the mantas as well as the public.

Sincerely,

Mendy Dant
Executive Vice President
Kona Sunrise Charters

From: [Rich Stone](#)
To: [DLNR.BLNR.Testimony](#)
Subject: Ala Wai Boat Harbor Comments
Date: Wednesday, October 10, 2018 6:37:12 PM

As an Ala Wai Harbor Live Aboard for 10+ years I would like to comment on the Proposals Related to the Boat Harbor. I know you are getting many comments so I will leave out the emotions, of which there are many, and focus on the business. Mahalo for reading and taking them into consideration.

RE: Proposed Increases

1) Electricity

While slips on the street pay a regular HECO bill the boats on the other docks pay flat fees regardless of consumption. Fair, is for everyone to be hooked up on an accurate system that measures individual use and pays accordingly. Why should a multi million dollar vessel pay the same price as a 23 foot boat using hardly any electricity?

2) Mooring Rates

How can anyone think it is fair for a 30' boat to pay the fees of a 35' or a 36' boat to pay same as a 41'? This system would not be fair to anyone.

3) Payment Schedule for Mooring Fees

Why is it necessary to change the payment due date? It will impact retirees and involves manpower by the harbor that can be used for higher priority projects.

4) Shower Fees

The fee for a keycard includes the use of the keyed bathrooms/showers. It is too difficult to monitor daily/monthly use. Did a person go in to use the bathroom or take a shower. This is micro managing and is not needed.

Raise the key card fee by a nominal, realistic amount if necessary.

5) Dock Boxes

No one should be charged for a box that is in disrepair. No one should have to pay for a box that is not secure, waterproof and practical.

In addition I'd like to offer my opinion on the following:

Management of the Ala Wai Boat Harbor is abysmal. As hard as the Harbormaster and his office try they are not equipped to get the job done. They get no support from the state.

1) Their systems are antiquated

2) Monies that can be used to upgrade facilities and repair docks (providing new revenue) never seem to find their way to the right places

3) There has been no attempt (last 10 years) to establish a Recycling Program

This would reduce the amounts of garbage and liquids in the dumpsters.

It is the proper thing to do in todays world. It will provide income for those participating.

Mahalo again for your time

Rich Stone

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