

Appendix H
Response to Comments and Comment Letters for
Draft Environmental Impact Statement (DEIS)

CHARLES K. DJOU
1ST DISTRICT, HAWAII

COMMITTEE ON ARMED SERVICES

COMMITTEE ON THE BUDGET

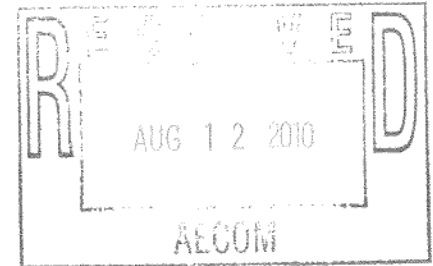
1502 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-1101
(202) 225-2726

300 ALA MOANA BOULEVARD
ROOM 4-104
HONOLULU, HI 96850
(808) 541-2570

www.djou.house.gov

Congress of the United States
House of Representatives
Washington, DC 20515-1101

August 6, 2010



Mr. Lambert Yamashita
Water/ Wastewater Manager of AECOM
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, HI 96813-3698

Aloha Mr. Yamashita,

Mahalo for taking the time to contact me and for sharing your views on the Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan's Final Environmental Assessment. By hearing your thoughts and concerns on the issues, I am better able to represent you in Congress.

Environmental issues are very important to me as your Representative and it is helpful for me to have the benefit of your personal perspective on this issue. I strongly believe that any infrastructure improvement in Hawai'i must not impact the local environment. Be assured that as this or related matters come before the House of Representatives, I will keep your views in mind.

Again, mahalo for contacting me. It is an honor to represent you in the U.S. House of Representatives. Please do not hesitate to contact me if my office can be of assistance to you or on any issue of importance to you.

To stay informed on other important issues, I encourage you to sign up for my electronic newsletter at www.djou.house.gov.

Aloha and Best Wishes,

CHARLES K. DJOU
Member of Congress

CKD/BMS



Natural Resources Conservation Service
P.O. Box 50004 Rm. 4-118
Honolulu, HI 96850
808-541-2600

September 3, 2010

Marisol Olaes
City and County of Honolulu
Department of Environmental Services
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707

Dear Ms. Olaes,

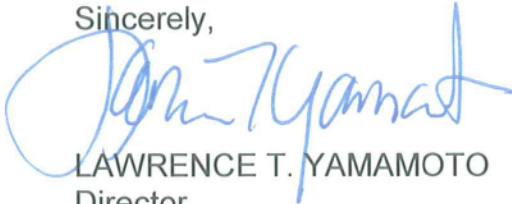
Thank you for providing the NRCS the opportunity to review the Final Environmental Assessment/Environmental Impact Statement Preparation Notice for the Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase 1, Oahu, Hawaii. Please find enclosed the NRCS maps indicating areas of Important Farmlands and hydric soils. The Important Farmlands map has been enclosed for your aid in determining if a Farmland Impact Conversion Rating Form (AD-1006) is needed for this project. Typically, this form is required on projects that convert farmlands into non-farmland uses, and have federal dollars attached to the project. See the website link below for more information on the Farmland Protection Policy Act (FPPA), and a copy of the AD-1006 form, with instructions. Areas committed to or already in urban development are not subject to FPPA. In addition, hydric soils are located in the project area. The hydric soils map also enclosed, shows the areas of hydric soils. Hydric soils identify potential areas of wetlands. If wetlands do exist, any proposed impacts to these wetlands would need to demonstrate compliance with the "Clean Water Act", and may need an Army Corp of Engineers 404 permit.

There are numerous soil types located within the project area identified by the NRCS Soil Survey. The soils have various properties and interpretations that would inform the soils potentials for the development of wastewater facilities. If you have any questions concerning the soils in the area please contact Tony Rolfes as detailed below.

The NRCS Soil Survey is a general planning tool and does not eliminate the need for an onsite investigation. If you have any questions concerning the soils or interpretations for this project please call, Tony Rolfes, Assistant State Soil Scientist, (808) 541-2600 x129, or email, Tony.Rolfes@hi.usda.gov.

NRCS - Farmland Protection Policy Act Website:
<http://www.nrcs.usda.gov/programs/fppa/>

Sincerely,



LAWRENCE T. YAMAMOTO
Director
Pacific Islands Area

Attachments: Honouliuli/Waipahu/Pearl City Wastewater Facilities Project Important
Farmlands Map
Honouliuli/Waipahu/Pearl City Wastewater Facilities Project Hydric Soils
Map

cc: Michael Robotham, Asst. Director SS & NRA, Pacific Islands Area State Office

Honouliuli/Waipahu/Pearl City Wastewater Facilities Project

Hydric Soils Map



Legend

 Approx. Project Boundary

Hydric Soils

<all other values>

HydrcRatng

 All Hydric

Not Hydric

 Partially Hydric

Unknown Hydric



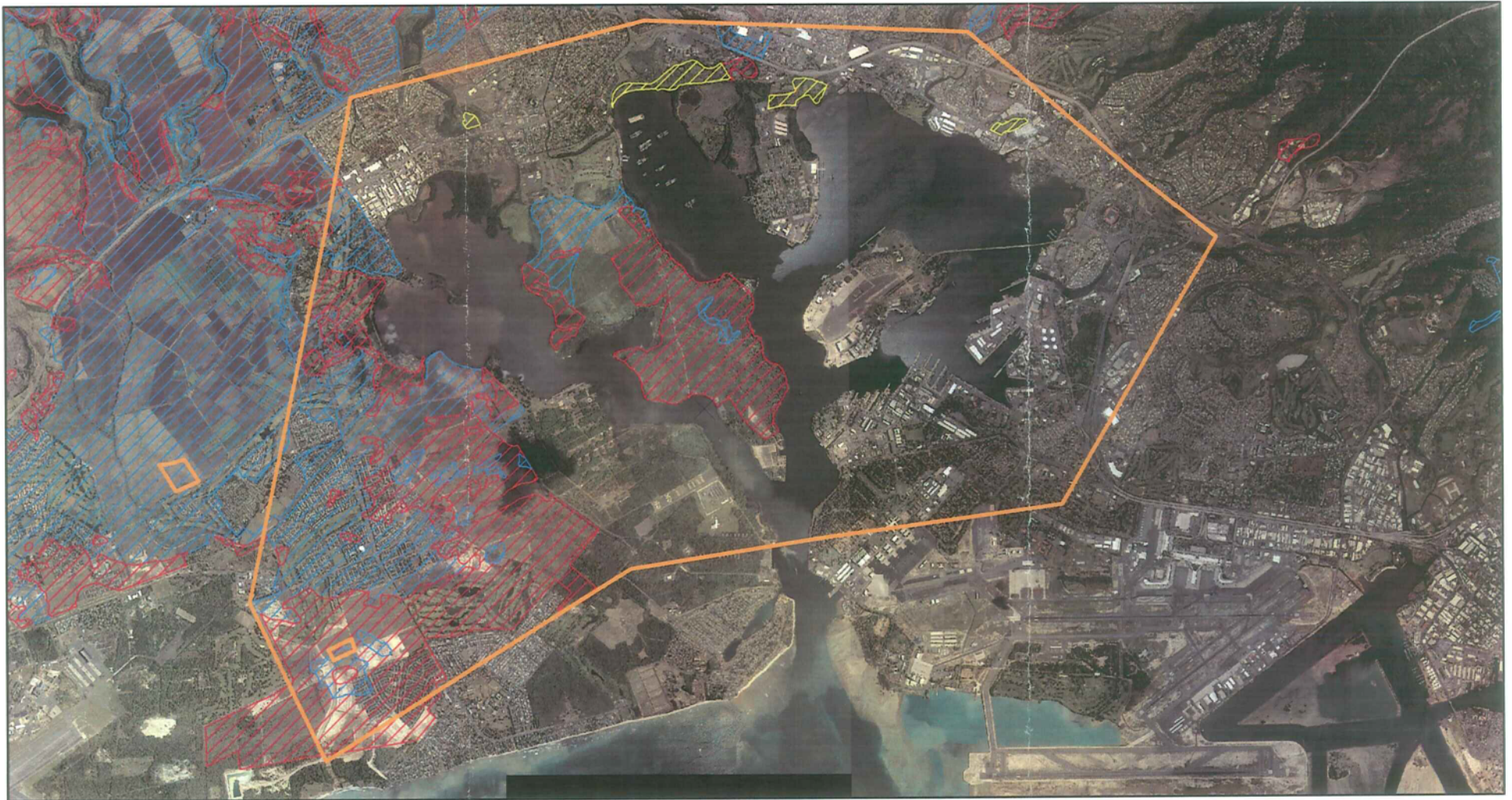
0 3,400 6,800 13,600 20,400 27,200 Feet



8/2010

Honouliuli/Waipahu/Pearl City Wastewater Facilities Project

Important Farmlands Map



Legend

 Approx. Project Boundary

Important Farmlands

Important Farmlands

TYPE

0

 Prime Farmland

 Unique Farmland

 Statewide Important Farmland



0 3,400 6,800 13,600 20,400 27,200 Feet



8/2010

LINDA LINGLE
GOVERNOR



RUSS K. SAITO
COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

OCT 12 2010

(P)1252.0

Mr. Lambert Yamashita, PE
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawai'i 96813



Dear Mr. Yamashita:

Subject: City and County of Honolulu
Honouliuli / Waipahu / Pearl City Wastewater Facilities Plan,
Ewa and Central Oahu

As discussed in our September 29, 2010 meeting, the Department of Accounting and General Services (DAGS) requests that you address the following changes in your plan regarding the segment that runs through Aloha Stadium property:

1. Realign the sewer main and easement as close to Salt Lake Boulevard and Kamehameha Highway as possible.
2. Locate a new pump station further Diamond Head of the existing station, along Salt Lake Boulevard and enable the existing pump house structure to be redeveloped into a new comfort station for stadium patrons.
3. Provide DAGS with a list of restraints relative to construction of operations/activities on/near the easement for the proposed sewer main.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Ernest Lau of the Public Works Division at 586-0526.

Sincerely,

A handwritten signature in black ink, appearing to read "Russ K. Saito".
RUSS K. SAITO
State Comptroller

DD:lnn

c: Ms. Linda Rosehill, Rosehill & Assoc.
Mr. Scott Chan, Aloha Stadium

LINDA LINGLE
GOVERNOR



RUSS K. SAITO
COMPTROLLER

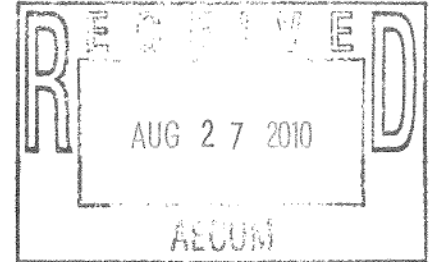
STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

AUG 26 2010

(P)1226.0

Mr. Lambert Yamashita
Water/Wastewater Manager
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawai'i 96813



Dear Mr. Yamashita:

Subject: Final Environmental Assessment/Environmental Impact Statement
Preparation Notice (FEA/EISPN) for the
Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase I Area
Oahu, Hawai'i

Thank you for the opportunity to provide comments for the subject facility plan. The proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities, and we have no comments to offer at this time.

If you have any questions, please call me at 586-0400 or have your staff call Ms. Gayle Takasaki of the Public Works Division at 586-0584.

Sincerely,

A handwritten signature in cursive script, reading "Russ K. Saito".

RUSS K. SAITO
State Comptroller

GT:lnn

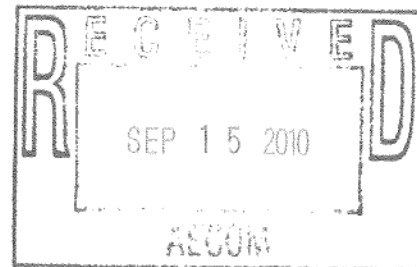
LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495



September 10, 2010

Mr. Lambert Yamashita, P.E.
Water/Waste Water Manager
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Subject: Final Environmental assessment/Environmental Impact Statement Preparation Notice (FEA/EISPN), Honouliuli/Waipahu/Pearl City Wastewater Facility Plan Phase 1 Area

WE ARE SENDING YOU:

Item	Copies	Description
1	1	Jointed review responses on the Final Environmental Assessment/Environmental Impact Statement Preparation Notice (FEA/EISPN), Honouliuli/Waipahu/Pearl City Wastewater Facility Plan Phase 1 Area

This is in response to your letter regarding the subject above. Please see our attached response from the Department of the Defense.

Thank you for giving us the opportunity to comment on the above Draft Environmental Assessment.

Should you have any questions, please contact Rodney Huang in the Engineering Office at 733-4250.

Sincerely,

Neal S. Mitsuyoshi, P.E.
Lieutenant Colonel
Chief Engineering Officer

Attachment

16 August 2010

Hawaii State Civil Defense Comments:

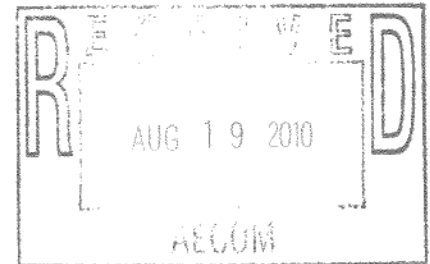
RE: Final Environmental Assessment/Environmental Impact Statement Preparation Notice (FEA/EISPN) for the Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase 1 Area, Oahu, Hawaii

- Upon review it has been determined that the scope of the project (the main conveyance system from Halawa WWPS to Waimalu WWPS to Pearl City WWPS to Waipahu WWPS to Honouliuli WWTP) although bordering an area of concern in the event of a Tsunami, falls outside present and potential Tsunami inundation zones, except where the Phase I Area crosses West Loch.
- It was found that although consideration has been given to mitigation measures in response to the impact of hurricanes and tsunamis on construction and operation (Sec. 4.4, pg 79), this section could be expanded to include a fuller description of planned actions in response to such threats.
- All the Wastewater Pump Stations associated with the Phase I Area are outside the Tsunami Evacuation Zones. Although the Kunia WWPS, West Loch Estates WWPS, and West Lock Fairways WWPS are bordering the tsunami evacuation zones, they are not in the inundation zones and should not be adversely affected by a tsunami event.



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES



August 17, 2010

Mr. Lambert Yamashita, P.E.
AECOM Technical Service, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Yamashita:

SUBJECT: Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan – Phase 1 Area
Final Environmental Assessment/Environmental Impact Statement Preparation
Notice (FEA/EISPN)

The Department of Education has reviewed your letter requesting comments on the Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan – Phase 1 Area Final Environmental Assessment/Environmental Impact Statement Preparation Notice (FEA/EISPN). We request detailed information on any and all impacts and proposed mitigation measures that are specific to Lehua Elementary and Pearl Ridge Elementary schools.

Should you have any questions, please do not hesitate to call Roy Ikeda of the Facilities Development Branch, Planning Section at 377-8301.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Duane Y. Kashiwai".
Duane Y. Kashiwai
Public Works Administrator
Facilities Development Branch

DYK:jmb

c: Marisol Olaes, City and County of Honolulu, Dept. of Environmental Services

LINDA LINGLE
GOVERNOR
STATE OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

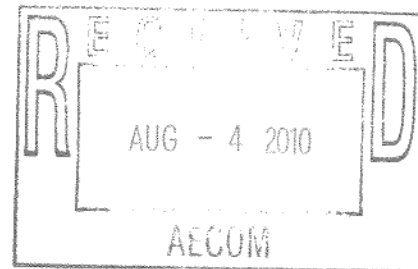
P.O. BOX 1879
HONOLULU, HAWAII 96805

KAULANA H. R. PARK
CHAIRMAN
HAWAIIAN HOMES COMMISSION

ANITA S. WONG
DEPUTY TO THE CHAIRMAN

ROBERT J. HALL
EXECUTIVE ASSISTANT

July 30, 2010



AECOM Technical Services, Inc.
Attn: Mr. Lambert Yamashita, P.E.
Suite 1600
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Yamashita:

Subject: Final Environmental Assessment/Environmental
Impact Statement Preparation Notice (FEA/EISPN) for the
Honuliuli/Waipahu/Pearl City Wastewater Facilities Plan,
Phase I Area, Oahu, Hawaii

Thank you for the opportunity to review the subject proposal.
The Department of Hawaiian Home Lands has no comment to offer
at this time.

If you have any questions, please contact our Planning Office
at (808) 620-9480.

Aloha and mahalo,

A handwritten signature in dark ink, appearing to read "Kaulana H.R. Park".

Kaulana H.R. Park, Chairman
Hawaiian Homes Commission



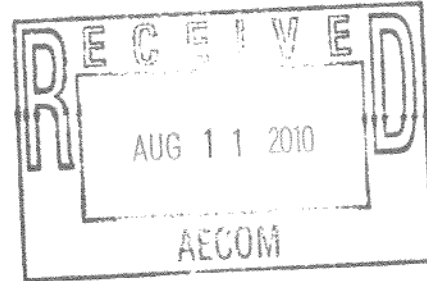
STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to
EMD / CWB

08016PDCL.10

August 9, 2010

Mr. Lambert Yamashita, P.E.
Water/Wastewater Manager
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813



Dear Mr. Yamashita:


**Subject: Final Environmental Assessment/
Environmental Impact Statement Preparation Notice for the
Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase 1
Island of Oahu, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), has reviewed the subject document and has no comments at this time. The DOH-CWB provided Environmental Assessment/Environmental Impact Statement Preparation Notice Pre-Assessment Consultation comments for this project (Letter No. 12071PDCL.09, dated December 21, 2009).

As a reminder, all discharges related to the project construction or operation activities, whether or not National Pollutant Discharge Elimination System permit coverage and/or Section 401 Water Quality Certification are required, must comply with the Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

If you have any questions, please visit our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact the Engineering Section, CWB, at 586-4309.

Sincerely,


ALEC WONG, P.E., CHIEF
Clean Water Branch

DCL:ml

c: DOH-EPO #I-3277 (w/Land Use Document)
Ms. Marisol Olaes, CCH-DES

LINDA LINGLE
GOVERNOR OF HAWAII



CHIYOME LEINAALA FUKINO, M.D.
DIRECTOR OF HEALTH



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:
EMD / WB
LUD-1 9 1 013 007-ID#462
Final EA EISPN
Honouliuli WW Fac Plan

September 2, 2010

Ms. Marisol Olaes
City & County of Honolulu
Department of Environmental Services
1000 Uluohia Street Suite 308
Kapolei, Oahu, Hawaii 96707

Dear Ms. Olaes:

Subject: Final Environmental Assessment / Environment Impact Statement Preparation Notice (FEA/EISPN) for the Honouliuli / Waipahu / Pearl City Wastewater Facilities Plan, Phase I Area, Oahu, Hawaii 91-1000 Gieger Road, Ewa Beach, HI 96706

Thank you for allowing us the opportunity to review the FINAL Environmental Assessment / Environment Impact Statement Preparation Notice (FEA/EISPN) document for the Honouliuli / Waipahu / Pearl City Wastewater Facilities Plan, Phase I Area.

We are always satisfied with having improvements considered for our existing wastewater systems and have no additional comments on the FINAL EA / EISPN.

Should you have any questions, please contact the Planning & Design Section of the Wastewater Branch at phone 586-4294.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sina Pruder".

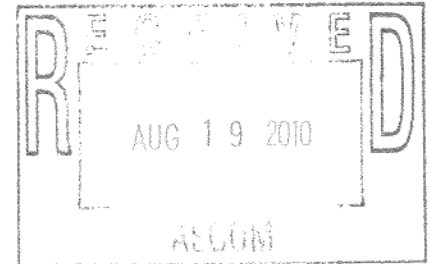
SINA PRUDER, P.E., ACTING CHIEF
Wastewater Branch

c: ☒ DOH's Environmental Planning Office (EPO I-3277)
☒ Mr. Lambert Yamashita, AECOM



STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
Benefit, Employment & Support Services Division
820 Mililani Street, Suite 606
Honolulu, Hawaii 96813

August 13, 2010



Mr. Lambert Yamashita, P.E.
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Yamashita:

Thank you for your letter dated July 23, 2010, that requests the Department review the Final Environmental Assessment/Environmental Impact Statement Preparation Notice (FEA/EISPN) for the Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase I Area, Oahu, Hawaii. The Director of the Department of Human Services (DHS) has forwarded your letter to me for a response.

After a review of the proposed project, we do not have any comments regarding any environmental impacts associated with the project. We, also, foresee an impact on the child care services in the community at this time that is similar to the impact on the 15 public schools listed in the vicinity of the project area.

If you have any questions or need further information, please contact Ms. Kathy Ochikubo, Child Care Program Specialist, at (808) 586-7058.

Sincerely,

A handwritten signature in cursive script that reads "Pankaj Bhanot".

Pankaj Bhanot
Division Administrator

c: Lillian B. Koller, Director/Department of Human Services
Marisol Olaes, City & County of Honolulu
Department of Environmental Services

LINDA LINGLE
GOVERNOR



PEARL IMADA IBOSHI
DIRECTOR

COLLEEN Y. LaCLAIR
DEPUTY DIRECTOR

**STATE OF HAWAII
DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS**

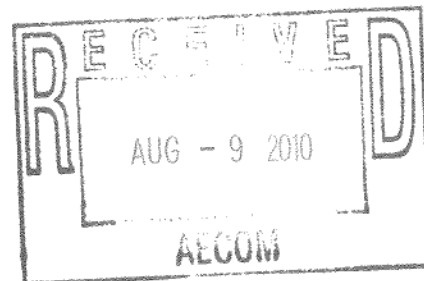
830 PUNCHBOWL STREET, ROOM 321
HONOLULU, HAWAII 96813

www.hawaii.gov/labor

Phone: (808) 586-8844 / Fax: (808) 586-9099

Email: dlir.director@hawaii.gov

August 4, 2010




Mr. Lambert Yamashita, P.E.
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Yamashita:

This is in response to your letter dated July 23, 2010, requesting our comments on the Final Environmental Assessment/Environmental Impact Statement Preparation Notice for the "Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase 1 Area" project on the island of Oahu. The Department of Labor and Industrial Relations does not have any comments to offer at this time.

Should you have any questions, please call me at (808) 586-8844, or Mr. Patrick Fukuki, our Business Management Officer, at (808) 586-8888.

Sincerely,


for PEARL IMADA IBOSHI
Director

c: City and County, Department of Environmental Services

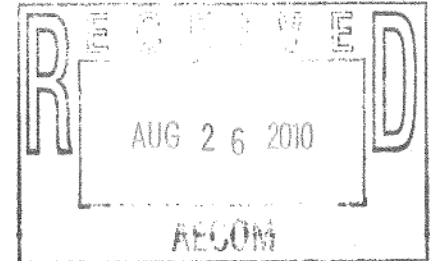
LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

August 19, 2010

Mr. Lambert Yamashita
AECOM
1001 Bishop Street, Suite 1600
Honolulu, HI 96813



Mr. Yamashita:

Attached you will find our comments on the Honoluiuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase 1 Area FEA/EIS PN. These comments are those of the Division of Aquatic Resources and do not necessarily represent the comments of the Department of Land and Natural Resources or the State of Hawaii.

Should you have any questions, please contact Mr. Brett Schumacher of my staff at 587-0113 or at Brett.D.Schumacher@hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Nishimoto".

Robert Nishimoto
Program Manager

Cc: Comments on FEA/EISPN

Subject: Final Environmental Assessment/Environmental Impact Statement Preparation Notice for Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan Phase 1 Area

Thank you for the opportunity to comment on the FEA/EISPN for Phase 1 of the wastewater facilities plan (FEA/EISPN).

The Division of Aquatic Resources (DAR) notes that several sanitary sewer overflows and other spills have occurred over the last several years, and strongly endorses changes and upgrades to the wastewater management system that will decrease the frequency and severity of such events.

As the FEA/EISPN indicates, the proposed project has the potential to prevent water pollution events in freshwater streams, the Pearl Harbor estuary, and nearshore marine waters. Suspended solids, pollutants and nutrient loads in these waters can have direct effects on resident aquatic organisms. The FEA/EISPN indicates that a biological assessment of the flora and fauna of these areas will be included in the DEIS. The DAR will reserve comment on specific aquatic resource species pending the results of these investigations, but has the following more general comments at this time:

1. The discharge of untreated wastewater can have profound, detrimental effects on aquatic organisms. As such, the DAR strongly supports the timely implementation of GST and other upgrades to the wastewater disposal system as a means of preventing such discharges in the future.
2. Studies at large (e.g. sewer outfall) and small (e.g. mariculture) eutrophication sites, and the experience of DAR biologists indicate that eutrophication can result in altered redox potential of benthic sediments, and in changes to algal, infaunal and associated aquatic communities. Eutrophication of epipelagic waters can result in ephemeral phytoplankton blooms that can also be detrimental to the marine ecosystem. Therefore, DAR strongly supports plans to upgrade wastewater treatment facilities to full secondary treatment, and to replace individual wastewater systems with more effective centralized treatment systems.
3. The FEA/EISPN makes frequent reference to 2-yr, 6-hr storms in reference to how the wastewater treatment system is likely to perform in response to heavy rain events. However, given that the life expectancy of the upgraded wastewater treatment system will be on the order of decades, it would be useful to include supplementary information in the DEIS about the expected performance of the alternative systems during larger, though less frequent, weather events.

Thank you again for the opportunity to comment on the proposed plan.

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

BRENNON T. MORIOKA
DIRECTOR

Deputy Directors
MICHAEL D. FORMBY
FRANCIS PAUL KEENO
JIRO A. SUMADA

IN REPLY REFER TO:

HWY-PS
2.6468



September 20, 2010

Mr. Lambert Yamashita
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Yamashita:

Subject: Final Environmental Assessment/Environmental Impact Statement Preparation
Notice (FEA/EISPN), Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan,
Phase 1 Area, Oahu, Hawaii

The FEA/EISPN is for a Phase 1 project to upgrade and/or expand the wastewater conveyance system within the Honouliuli sewer contributory area to the Honouliuli Wastewater Treatment Plant.

It is anticipated that this project will not impact our State highway facilities after completion of the construction work. However, during construction there may be impacts to the State Highways. To this end, coordination and best practices shall be used to minimize traffic impacts and inconvenience to the users of the State highway during construction.

The project traffic impact report should document expected changes in staffing at project facilities, if applicable, and provide for improvements as needed.

If you have any questions, please contact Ken Tatsuguchi, Engineering Program Manager, Highways Division, Planning Branch, at 587-1830. Please reference review 2010-168.

Very truly yours,

A handwritten signature in blue ink, appearing to be "BM", written over a horizontal line.

BRENNON T. MORIOKA, Ph.D., P.E.
Director of Transportation

c: Marisol Olaes, Department of Environmental Services

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



January 13, 2010

MUFI HANNEMANN, Mayor

RANDALL Y. S. CHUNG, Chairman
SAMUEL T. HATA
ALLY J. PARK
ROBERT K. CUNDIFF
WILLIAM K. MAHOE

JEFFREY S. CUDIAMAT, Ex-Officio
BRENNON T. MORIOKA, Ex-Officio

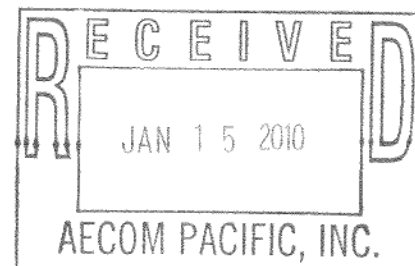
WAYNE M. HASHIRO, P.E.
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager and Chief Engineer

Mr. Lambert Yamashita
Water/Wastewater Manager
AECOM Pacific, Inc.
841 Bishop Street, Suite 1900
Honolulu, Hawaii 96813

Dear Mr. Yamashita:

Subject: Your Letter of November 30, 2009 Regarding the Environmental
Assessment/Environmental Impact Statement Preparation Notice
Pre-Assessment Consultation for the Honouliuli/Waipahu/Pearl City
Wastewater Facilities Plan, Ewa and Central Oahu, Hawaii



Thank you for your letter requesting comments on the proposed Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan.

We have the following comments:

1. Water system improvements in the vicinity of the Honouliuli Wastewater Treatment Plant (WWTP) may be required to improve the reliability of the existing potable water system and for the potential expansion of the Honouliuli WWTP.
2. Please submit any requests for additional potable water or recycled water for Board of Water Supply (BWS) review.
3. Construction drawings should be submitted for BWS review as part of the building permit application process.
4. The availability of water will be confirmed when the building permit application is submitted for review and approval.

Mr. Lambert Yamashita
January 13, 2010
Page 2

5. We recommend the use of drought tolerant/low water use plants and xeriscaping principles for all landscaping. We also recommend the installation of an efficient irrigation system, such as drip irrigation, incorporating moisture sensors to avoid the operation of the system in the rain and if the ground has adequate moisture.
6. We reserve further comments until the Environmental Assessment/ Environmental Impact Statement Preparation Notice is submitted for our review.

If there are any questions, please contact Scot Muraoka at 748-5942.

Sincerely,

A handwritten signature in cursive script that reads "Wayne M Hashiro".

WAYNE M. HASHIRO, P.E.
Manager and Chief Engineer.

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



August 19, 2010

KIRK W. CALDWELL, Acting Mayor

RANDALL Y. S. CHUNG, Chairman
WILLIAM K. MAHOE
THERESIA C. McMURDO
ADAM C. WONG

JEFFREY S. CUDIAMAT, Ex-Officio
BRENNON T. MORIOKA, Ex-Officio

WAYNE M. HASHIRO, P.E.
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager

Mr. Lambert Yamashita, P.E.
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96707

Dear Mr. Yamashita:

Subject: Your Letter Dated July 23, 2010 Requesting Comments on the Final
Environmental Assessment/Environmental Impact Statement Preparation
Notice for the Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan,
Phase 1 Area



Thank you for the opportunity to comment on the proposed project.

Our comments dated January 13, 2010, which is included in the document, are still applicable.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,

PAUL S. KIKUCHI
Chief Financial Officer
Customer Care Division

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
ACTING MAYOR

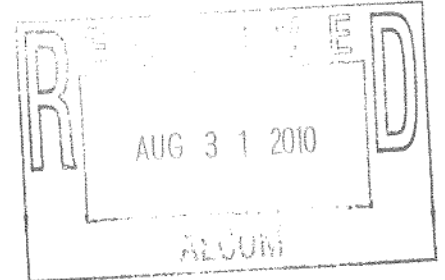


CRAIG I. NISHIMURA, P.E.
DIRECTOR

COLLINS D. LAM, P.E.
DEPUTY DIRECTOR

August 26, 2010

Mr. Lambert Yamashita, P.E.
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813



Dear Mr. Yamashita:

Subject: Final Environmental Assessment/ Environmental Impact Statement
Preparation Notice (FEA/ EISPN) for the Honouliuli / Waipahu/
Pearl City Wastewater Facilities Plan, Phase1 Area, Oahu, Hawaii

Thank you for inviting us to review the above Final Environmental Assessment/
Environmental Impact Statement Preparation Notice. The Department of Design and
Construction does not have any comments to offer at this time.

Should you have any questions, please contact me at 768-8480.

Very truly yours,


Craig I. Nishimura, P.E.
Director

CN:pg(376930)

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

KIRK W. CALDWELL
ACTING MAYOR



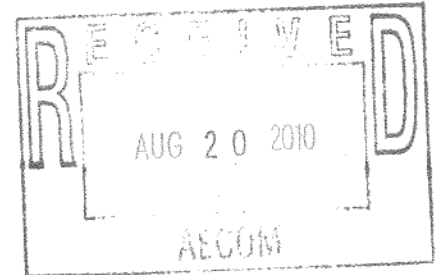
JEFFREY S. CUDIAMAT, P.E.
DIRECTOR AND CHIEF ENGINEER

GEORGE "KEOKI" MIYAMOTO
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 10-628

August 19, 2010

Mr. Lambert Yamashita, P.E.
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813



Dear Mr. Yamashita:

Subject: Final Environmental Assessment/Environmental Impact
Statement Preparation Notice (FEA/EISPN) for the
Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan,
Phase I Area, Oahu, Hawaii

Thank you for the opportunity to provide comments on the FEA/EISPN dated July 2010 for the subject Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan.

We have no additional comments to offer. We appreciate that our earlier concerns regarding open trench construction and subsequent backfill material to be considered, expressed during the pre-assessment consultation for the project, have been addressed in this FEA/EISPN.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 768-3697.

Sincerely,

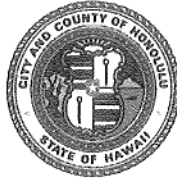
A handwritten signature in black ink, appearing to read "Jeffrey S. Cudiamat".

Jeffrey S. Cudiamat, P.E.
Director and Chief Engineer

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

KAPOLEI HALE, 1000 ULUOHIA STREET, STE. 309 • KAPOLEI, HAWAII 96707
Phone: (808) 768-3003 • FAX: (808) 768-3053 • Internet: www.honolulu.gov

KIRK W. CALDWELL
ACTING MAYOR

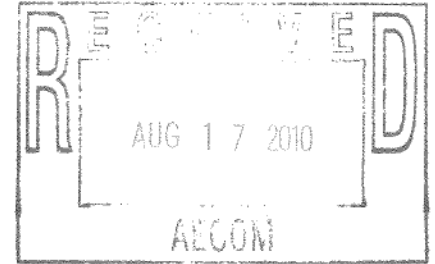


LESTER K. C. CHANG
DIRECTOR

RICHARD HARU
DEPUTY DIRECTOR

August 13, 2010

Mr. Lambert Yamashita, P.E.
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813



Dear Mr. Yamashita:

Subject: Final Environmental Assessment/Environmental Impact Statement
Preparation Notice (FEA/EISPN) for the Honouliuli/Waipahu/Pearl City
Wastewater Facilities Plan, Phase I Area, Oahu, Hawaii

Thank you for the opportunity to review and comment on the Final Environmental
Assessment/Environmental Impact Statement Preparation Notice for the
Honouliuli/Waipahu/Pearl City Wastewater Facilities plan.

The Department of Parks and Recreation has no comment on the FEA/EISPN notice
however; we appreciate that a project objective be stated to avoid any impairment of public
use of the existing parks and that any unavoidable impacts will be reviewed in consultation
with the department for acceptability before proceeding further.

We also want to alert you to the fact that Neal S. Blaisdell Park is subject to National
Park Service 6(f) restrictions pursuant to a Land Water Conservation Grant to the City in 1990.

Should you have any questions, please contact Mr. John Reid, Planner, at
768-3017.

Sincerely,

A handwritten signature in black ink, appearing to read "Lester K. C. Chang".

LESTER K. C. CHANG
Director

LKCC:jr
(376785)

cc: Craig Mayeda, PMRS
Dexter Liu, D-3

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluluodpp.org • CITY WEB SITE: www.honolulu.gov

KIRK W. CALDWELL
ACTING MAYOR



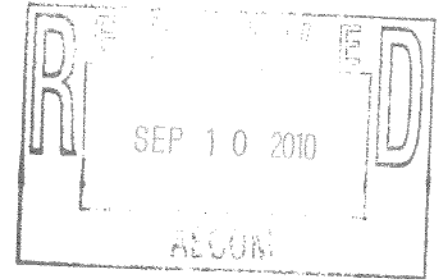
DAVID K. TANOUÉ
DIRECTOR

ROBERT M. SUMITOMO
DEPUTY DIRECTOR

10WWB050 (SG)
2010/ELOG-1524

September 8, 2010

Mr. Lambert Yamashita, P.E.
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813



Dear Mr. Yamashita:

Subject: Final Environmental Assessment/Environmental Impact Statement
Preparation Notice (FEA/EISPN) for the Honouliuli/Waipahu/Pearl City
Wastewater Facilities Plan, Phase I Area

This is in response to your July 23, 2010 letter, requesting comments for the proposed Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan. We have reviewed the subject FEA/EISPN and have the following comments:

1. In Section 3.1, the population and flow projections use the year 2030. The Department of Planning and Permitting (DPP) uses the year 2035, which is available to the public and is included in our latest Annual Report (Fiscal Year 2008). The FEA/EISPN should explain why the year 2030 is deemed more appropriate than 2035. Mr. Steve Young of the Planning Research Branch (768-8037) can provide assistance on the 2035 projections.
2. Section 8.2.1 should describe how the proposed project supports relevant objectives and policies in the Oahu General Plan related to transportation and utilities. The General Plan can be viewed/printed from DPP's website:
www.honoluluodpp.org/Planning/OahuGenPlan.asp.
3. The term "Community Plan" in Section 8.2.2 should be changed to "Development Plan/Sustainable Communities Plan." The Phase I area encompasses portions of the Primary Urban Center Development Plan (PUC DP) area, Central Oahu Sustainable Communities Plan (CO SCP) area, and the Ewa DP area. As such, this section should be expanded by describing how the proposed project supports the relevant objectives, policies, principles, and guidelines in all three areas. The PUC and Ewa DP and CO SCP can be viewed/printed from DPP's website:
www.honoluluodpp.org/Planning/DevSustCommPlans.asp.
4. The project's scope affects several communities within the Ewa, CO, and PUC DP areas. As such, the project may affect other planning efforts created or under development by DPP. These plans include more detailed land use plans called Special

Area Plans (SAP) which provide more detailed policies, principles, and guidelines than those contained in the SCP or DP documents themselves. As such, the proposed project should discuss how the project would affect the "Waipahu Town Plan" (December 1995) and the "Aiea-Pearl City Livable Communities Plan" (May 2004).

The FEA/EISPN should also discuss the project's effect on the "Pearl Harbor Historic Trail Master Plan" (May 2001). While this plan is not a SAP, it involves long-range land use planning efforts along the shoreline between Waipahu and Aiea that is within the Honouliuli sewer shed.

The project proposes improvements to existing sewer facilities that run along or under major existing rights-of-way such as Farrington and Kamehameha Highways. As you may know, the City also intends to utilize portions of these major transportation corridors for its current rapid transit project. As part of the rapid transit project, DPP is currently working on several Transit-Oriented Development (TOD) plans that involve land use development around the transit stations. As such, the FEA/EISPN should discuss the project's consistency with the "Waipahu Neighborhood TOD Plan," "East Kapolei Neighborhood TOD Plan," and the ongoing "Aiea-Pearl City Neighborhood TOD Plan." Information about these TOD plans can be viewed on DPP's website: www.honoluludpp.org/Planning/, or by calling the Community Planning Branch at 768-8048.


5. All references to "Development Plan Public Facilities Map Amendment" in the Project Summary and Section 9.0 "Permits and Approvals" and other sections of the FEA/EISPN should be deleted because this term is no longer used by DPP. The new term that should be used is "Public Infrastructure Map Revision." The applicant will be required to submit applications to revise the PUC Public Infrastructure Map (PIM), CO PIM or the Ewa PIM should there be a need to develop new wastewater pump stations (WWPS) or modify existing WWPSs (including enlarging or relocating them) as part of this project. Revisions to the PIM must be approved by resolution by the City Council prior to the budgeting of land acquisition and/or construction funds for major municipal facilities such as WWPSs. A PIM revision to the Honouliuli Wastewater Treatment Plant (WWTP) will not be necessary because there are two existing symbols on the Ewa PIM (PIM #002 and #013) that will accommodate any future improvements to the Honouliuli WWTP, including expanding the existing site further north or west. Include a section in Section 8.2 to briefly discuss the PIMs and any revisions needed.
6. A Special Management Area (SMA) permit will be required before any other permits can be issued for the project. If a shoreline setback variance (SSV) is also required, a current certified shoreline survey must be obtained prior to applying for the SSV. Both the SMA and the SSV may be processed concurrently.
7. The project may require a trenching permit from DPP.
8. The project should address Section II (Storm Water Quality) of the "Rules Relating to Storm Drainage Standards."

Mr. Lambert Yamashita, P.E.
September 8, 2010
Page 3

9. Section 4.3.4 Flood Hazard - Existing Environment, page 75-76: Based on the TMK cited in the report, the Pearl City WWPS is within an AE zoned area. A large majority of this parcel is therefore subject to regulations for construction within a floodway.
10. Figures 4-8 and 4-9 seem to provide conflicting assessments of the flood potential for the Pearl City WWPS.
11. The last sentence on page 89 should read "This issue will be addressed . . ."

Should you have any questions on comment nos. 1 to 5, please contact Mr. Tim Hata of our Policy Planning Branch at 768-8043. For questions on comment no. 6 please contact Mr. Jamie Peirson of our Land Use Approval Branch at 768-8014. For questions on comment nos. 7 to 11, please contact Mr. Scott Gushi of our Wastewater Branch at 768-8207 for coordination.

Very truly yours,


For David K. Tanoue, Director
Department of Planning and Permitting

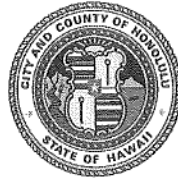
DKT:dl
[795319]

cc: Policy Planning Branch
CEB
Land Use Approval Branch

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

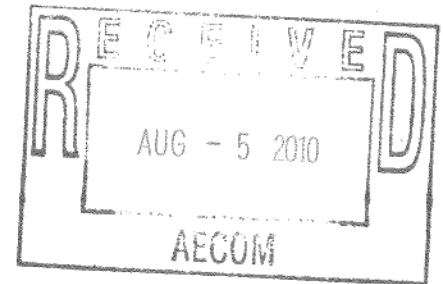
KIRK W. CALDWELL
ACTING MAYOR



KENNETH G. SILVA
FIRE CHIEF

ROLLAND J. HARVEST
DEPUTY FIRE CHIEF

August 3, 2010



Mr. Lambert Yamashita, P.E.
Water/Wastewater Manager
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Yamashita:

Subject: Final Environmental Assessment/Environmental Impact Statement
Preparation Notice
Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Phase 1 Area
Tax Map Keys: 9-1-009: 112; 9-1-013: 007; 9-1-017: 006; 9-1-057: 022
and 028; 9-1-063: 113; 9-1-069: 003; 9-1-103: 001; 9-2-017: 001;
9-3-002: 009; 9-4-049: 047; 9-4-141: 086; 9-5-001: 033; 9-6-004: 005;
9-7-016: 001 and 028; 9-7-017: 002; 9-7-091: 071; 9-8-007: 008; and
9-9-003: 061 and 062

In response to your letter of July 23, 2010, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet (45 720 mm) from a fire apparatus access road as measured by an approved route around the exterior of the building or facility. (1997 Uniform Fire Code, Section 902.2.1.)
2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

Mr. Lambert Yamashita, P.E.
Page 2
August 3, 2010

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2 as amended.)

3. Submit civil drawings to the HFD for review and approval.

Should you have any questions, please call Battalion Chief Socrates Bratakos of our Fire Prevention Bureau at 723-7151.

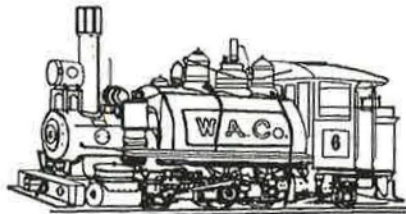
Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth G. Silva".

KENNETH G. SILVA
Fire Chief

KGS/SY:bh

cc: Marisol Olaes, Department of Environmental Services



Hawaiian Railway Society

A Chapter of the National Railway Historical Society
P.O. Box 60369, Ewa Station, Ewa Beach, HI 96706
(808) 681-5461 or Hawaiianrailway.com

November 27, 2010

Lambert Yamashita
AECOM
841 Bishop St. Suite 1900
Honolulu, HI 96813



Dear Mr. Yamashita.

In response to our meeting on September 1, 2010.

It appears that Tunnel Alignment A will be sufficiently deep enough as it runs under the OR&L Right of Way that it shouldn't be a concern.

The vertical access tunnel (1Aips) is also sufficiently far enough from the OR&L corridor that our only concern with either tunnel would be damage done to the right of way or tracks caused by surface construction vehicles in the area.

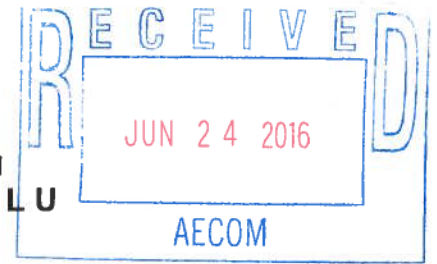
Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Yatchmenoff'.

Robert Yatchmenoff
President, HRS

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



KIRK CALDWELL
MAYOR



ROBERT J. KRONING, P.E.
DIRECTOR

MARK YONAMINE, P.E.
DEPUTY DIRECTOR

June 22, 2016

AECOM
Attn: Mathew Stimpson
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Stimpson,

Subject: Draft Environmental Assessment for the Honouliuli Wastewater
Treatment Plan Facilities Plan, Honouliuli Wastewater Treatment
Secondary Treatment and Support Facilities
Oahu, Hawaii

The Department of Design and Construction, Wastewater Division has some comments. I have enclosed the comments for you to review.

Thank you for the opportunity to review and comment. If there are any further questions, please call Tina Ono at 768-8794.

Sincerely,

A handwritten signature in black ink, appearing to read "R. M. Kroning".

Robert Kroning, P.E.
Director

RJK:ms(652633)
cc: Department of Environmental Services
Marisol Olaes

1. Please contact the design team of the 'Honouliuli Wastewater Treatment Plant, Secondary Treatment' project to arrange a meeting to exchange information on appropriate items below, for inclusion in the EIS. Please contact Cindy Masuoka at 768-8761 or Raj Rath at 768-8767.
2. *Section 4.4 Recommended Alternative* - Recommend updating the "Recommended Alternative" description to include all components of the latest design. Update Tables 4-4, 4-5 and 4-6.
Note: There are several statements in the Preface Letter and in the Unresolved Issues Section of the Summary Sheet that indicate additional environmental review documentation will be prepared for changes to the site layout and support structures and to the Odor Control System (OCS). Ideally, as a matter of disclosure the EIS should cover as much of the known design/program scope as possible and provide a conservative range of quantities/dimensions (maximum footprint, volume, height, staffing, parking) of those components.
3. *Section 4 Alternatives Considered* - Please include verbiage to address the following potential improvements:
 - a. New dryers and dryer building.
 - b. New emergency generator/motor control center/boiler building for the dryer system.
 - c. Pellet storage silo and truck load out, and emergency pellet storage.
 - d. Cake receiving facility odor control system.
 - e. Combined heat and power (CHP) building.
 - f. Modification of the existing administration/control building for a new elevator.
 - g. Septage and sludge receiving stations.
4. *Section 4, Tables 4-4 and 4-6* – Please update these to include the most recent number and sizes of the proposed facilities for the different phases of design.
5. *Section 4.1.5 Solids Handling System and Table 4-1* – How do the sludge quantities in Table 4-1 (273,000 gpd / 273,000 gpd) relate to the text in Section 4.1.5 (757,000 gpd)? Also, recommend cross-referencing this section with 5.13.3.3 – Operational Impacts and Mitigation Measures (Solid Waste Disposal Section).
6. *Section 4.1.6 Odor Control System, Second Paragraph*- The first sentence is incomplete. Also, recommend that additional information on the potential OCS facilities be provided, to include: types, locations, and approximate sizes/dimensions (including height of chimneys) of required components/structures. Else, the construction of the OCS facilities may require a separate EA.
7. *Section 4.1.8 Perimeter Access, Security and Fence* – Recommend using best professional judgement to provide a conservative range of fence heights (minimum and maximum).
8. *Section 4.7 Project Phasing and Schedule* – Please update the phasing description based on the most current plan.

9. *Section 5.2.2.2 Soils, Construction Impacts and Mitigation Measures* states: "Excavation is likely to be necessary..." without further detail. *Section 5.13.3.2, Solid Waste Disposal, Construction Impacts and Mitigation Measures* states: "Approximately 673,250 cubic yards would be excavated...". Recommend disclosing the estimated excavation quantities in Section 5.2.2.2. Also, if the mitigation measure for the 100,000 cubic yards of excess soil is to keep it on site, recommend that it be stated so in Section 5.2.2.2 and Section 5.13.3.2, with a description of the approximate soil storage area location and dimensions. Recommend cross-referencing Sections 5.2.2.2 and 5.13.3.2.
10. *Section 5.13.3.2 Solid Waste Disposal, Construction Impacts and Mitigation Measures* – If the excess excavated material (approximately 100,000 cubic yards) will be transported off-site, recommend disclosing traffic impacts from truck traffic (100,000 cubic yards / 10 cubic yards per truck = 10,000 truck trips).
11. *Section 5.13.3.3 Solid Waste Disposal, Operational Impacts and Mitigation Measures* - What are the options for sludge disposal (e.g. landfill, H-Power, land application-fertilizer)? Recommend that the salient recommendations of the *Island-wide Sludge Management Plan* be summarized in the EIS, or the document be attached as an appendix. Recommend cross-referencing this section with Section 4.1.5, Solids Handling System.
12. *Section 5.3.2.2 Surface Water, Construction Impacts and Mitigation Measures* – Add that construction activities will be conducted in compliance with a CWA 402 NPDES Construction Stormwater Permit issued by the Department of Health – Clean Water Branch. Add "Stream..." before "...Channel Alteration Permit (SCAP)".
13. *Section 5.10.2 Traffic, Construction Impacts and Mitigation Measures* – Recommend adding impacts from truck trips for soil disposal, if appropriate.
14. *Section 5.10.3 Traffic, Operational Impacts and Mitigation Measures* – Consider adding impacts from increased truck trips generated by operations at: (i) sludge receiving station, (ii) cake handling facility, (iii) pellet storage facility, (iv) septage/FOG facility, and (v) gas generation facility if commercialized. Each of these facilities will generate daily vehicle truck traffic to and from the WWTP for deliveries and pickup.
15. *Section 5.11.3 Visual and Aesthetic Resources, Operational Impacts and Mitigation Measures* – Recommend including a description (range or estimated maximum height) of the existing and proposed buildings/structures heights. The only reference to height in the document pertains to the proposed fencing and only mentions that fence height and setbacks will be considered to minimize impacts to the surrounding neighborhood. The new structures have greater potential for visual impacts. The maximum height per the zoning is 80 feet. Will any of the structures exceed this height, e.g. the 4th digester tank? If so, a height waiver will be required. Is there still an active flight path from Barber's Point over the site? If so, an FAA Obstruction Evaluation / Airport Airspace Analysis (notice of proposed construction form) will be required.

16. *Sections 4.1.7 Electrical and 5.13.4.1 Electrical and Communication Services, Existing Setting and 5.13.4.2 Electrical and Communication Services, Construction Impacts and Mitigation Measures* – Recommend cross-referencing these sections. Please clarify whether the existing electrical distribution is overhead or underground – the text indicates both. Recommend adding a statement about the adequacy of the existing Hawaiian Electric Company (HECO) source or HECO in combination with other alternative energy sources to meet the project needs.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-027

March 23, 2017

MEMORANDUM

TO: Robert Kroning, P.E. Director
Department of Design and Construction

FROM: Lori M. K. Kahikina, P.E.
Director

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter to AECOM dated June 13, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. Please contact the design team of the 'Honouliuli Wastewater Treatment Plant, Secondary Treatment' project to arrange a meeting to exchange information on appropriate items below, for inclusion in the EIS. Please contact Cindy Masuoka at 768-8761 or Raj Rath at 768-8767.

Response: Acknowledged. There have been several project meetings with the design team since the Draft EIS was made available, and the exchange of information has been a continuing effort.

2. Section 4.4 Recommended Alternative - Recommend updating the "Recommended Alternative" description to include all components of the latest design. Update Tables 4-4, 4-5 and 4-6. Note: There are several statements in the Preface Letter and in the Unresolved Issues Section of

the Summary Sheet that indicate additional environmental review documentation will be prepared for changes to the site layout and support structures and to the Odor Control System (OCS). Ideally, as a matter of disclosure the EIS should cover as much of the known design/program scope as possible and provide a conservative range of quantities/dimensions (maximum footprint, volume, height, staffing, parking) of those components.

Response: Acknowledged. This EIS is based on the planning work provided as part of the Preliminary Engineering Report, and additional details and updates that were available at the beginning of the design phase of the project in early 2016. As is typical of these types of projects, the design phase of the project will result in additional changes and filling in of the project details. The recommended alternative includes the statement that "It is anticipated that further changes to the site layout, support structures, and buildings will occur as part of later detailed design efforts". It is noted that flexibility to accommodate changes that occur during the design phase are included in the description of the project. The lists of proposed facilities on the conceptual layout plans cover a range of planned improvements, and, as stated, is intended to be conceptual. The statements regarding the need for additional environmental review are intended in case there are significant changes in the action, impacts and mitigation measures. Tables 4-4, 4-5 and 4-6 have been appropriately updated in the FEIS.

3. Section 4 Alternatives Considered - Please include verbiage to address the following potential improvements:
 - a. New dryers and dryer building.
 - b. New emergency generator/motor control center/boiler building for the dryer system.
 - c. Pellet storage silo and truck load out, and emergency pellet storage.
 - d. Cake receiving facility odor control system.
 - e. Combined heat and power (CHP) building.
 - f. Modification of the existing administration/control building for a new elevator.
 - g. Septage and sludge receiving stations.

Response: We acknowledge the need to include as much detailed information into the EIS as possible, but still provide flexibility to accommodate additional changes and filling in of the project details that will occur during the design phase. Project elements are included in the conceptual site maps, or referred to in the text. A list has been included in the Preface section in order to provide further information. It is noted that the flexibility in the range of project elements listed does not change the general description of the action, the significant impacts or the mitigation measures for the project, and adequately meets HRS 343 requirements.

4. Section 4, Tables 4-4 and 4-6 – Please update these to include the most recent number and sizes of the proposed facilities for the different phases of design.

Response: Acknowledged. Some information has been appropriately updated. It is noted that Table 4-4 is intended to provide a relative comparison of options based on the information available during the planning phase, and not intended to reflect all the project details that will be developed during the design phase. The options in Table 4-4 all meet the basis of design criteria. Table 4-6 presents a summary of information, based on information available at the time, but also is not intended to provide all the project details. As stated in the above responses, there is flexibility to accommodate additional changes and filling in of the project details that will occur during the design phase.

5. Section 4.1.5 Solids Handling System and Table 4-1 – How do the sludge quantities in Table 4-1 (273,000 gpd / 273,000 gpd) relate to the text in Section 4.1.5 (757,000 gpd)? Also, recommend cross-referencing this section with 5.13.3.3 – Operational Impacts and Mitigation Measures (Solid Waste Disposal Section).

Response: They vary by the difference in concentration. Table 4-1 has been revised to clarify estimated sludge quantities. Cross reference has been added.

6. Section 4.1.6 Odor Control System, Second Paragraph- The first sentence is incomplete. Also, recommend that additional information on the potential OCS facilities be provided, to include: types, locations, and approximate sizes/dimensions (including height of chimneys) of required components/structures. Else, the construction of the OCS facilities may require a separate EA.

Response: Revised first sentence. A list of potential project elements covered by the FEIS has been included in the Preface section, and odor

control systems are included in the list. Additional details, based on planning phase information, can be found in TM 12.O. As stated in the above responses, there is flexibility to accommodate additional changes and filling in of the project details that will occur during the design phase. The various details of the final design of the odor control systems are subject to change, but it is not expected that these changes affect the general description of the action, the significant impacts or the mitigation measures for the project.

7. Section 4.1.8 Perimeter Access, Security and Fence – Recommend using best professional judgement to provide a conservative range of fence heights (minimum and maximum).

Response: Text added “At a minimum a fence of six feet in height, and berms and/or landscaping shall be required around the Wastewater Treatment Plant.

8. Section 4.7 Project Phasing and Schedule – Please update the phasing description based on the most current plan.

Response: Updated project phasing and scheduling based off of the Honouliuli Fac Plan PER. Also, text added “Other potential phasing strategies may be applied as the design progresses”. The various details of the project phasing are subject to change, but it is not expected that these changes affect the general description of the action, the significant impacts or the mitigation measures for the project.

9. Section 5.2.2.2 Soils, Construction Impacts and Mitigation Measures states: “Excavation is likely to be necessary...” without further detail. Section 5.13.3.2, Solid Waste Disposal, Construction Impacts and Mitigation Measures states: “Approximately 673,250 cubic yards would be excavated...”. Recommend disclosing the estimated excavation quantities in Section 5.2.2.2. Also, if the mitigation measure for the 100,000 cubic yards of excess soil is to keep it on site, recommend that it be stated so in Section 5.2.2.2 and Section 5.13.3.2, with a description of the approximate soil storage area location and dimensions. Recommend cross-referencing Sections 5.2.2.2 and 5.13.3.2.

Response: Text added to Section 5.2.2.2. Included volume of excavated material, and cross-referenced Section 5.13.3.2. The majority of the soil would be reused on site. It is not intended that any significant permanent soil storage location be established.

10. Section 5.13.3.2 Solid Waste Disposal, Construction Impacts and Mitigation Measures – If the excess excavated material (approximately 100,000 cubic yards) will be transported off-site, recommend disclosing traffic impacts from truck traffic (100,000 cubic yards / 10 cubic yards per truck = 10,000 truck trips).

Response: Traffic generation analyzed in the TIAR (Appendix F) included up to 8 trips per hour (4 round trips) from the site. This level of trips was generated based on both delivery of material and hauling of waste material offsite.

11. Section 5.13.3.3 Solid Waste Disposal, Operational Impacts and Mitigation Measures - What are the options for sludge disposal (e.g. landfill, H-Power, land application-fertilizer)? Recommend that the salient recommendations of the Island-wide Sludge Management Plan be summarized in the EIS, or the document be attached as an appendix. Recommend cross-referencing this section with Section 4.1.5, Solids Handling System.

Response: Cross-referenced to Section 4.1.5, where options are discussed. Also, a list of potential project elements covered by the FEIS has been included in the Preface section, including the project elements relating to sludge handling and disposal that are planned to be located within the WWTP site. Actions that relate to other sites are covered by the environmental review process for those sites.

12. Section 5.3.2.2 Surface Water, Construction Impacts and Mitigation Measures – Add that “Construction activities will be conducted in compliance with a CWA 402 NPDES Construction Stormwater Permit issued by the Department of Health – Clean Water Branch. Add “Stream...” before “...Channel Alteration Permit (SCAP)”.

Response: Added text as noted.

13. Section 5.10.2 Traffic, Construction Impacts and Mitigation Measures – Recommend adding impacts from truck trips for soil disposal, if appropriate.

Response: Traffic generation analyzed in the TIAR (Appendix F) included up to 8 trips per hour (4 round trips) from the site. This level of trips was generated based on both delivery of material and hauling of waste material offsite.

14. Section 5.10.3 Traffic, Operational Impacts and Mitigation Measures – Consider adding impacts from increased truck trips generated by operations at: (i) sludge receiving station, (ii) cake handling facility, (iii) pellet storage facility, (iv) septage/FOG facility, and (v) gas generation facility if commercialized. Each of these facilities will generate daily vehicle truck traffic to and from the WWTP for deliveries and pickup.

Response: Acknowledged. Added text: “Trips were also increased to address trips for solids and solids product handling.” The estimates provided accommodate the expected increase from present levels to future levels.

15. Section 5.11.3 Visual and Aesthetic Resources, Operational Impacts and Mitigation Measures – Recommend including a description (range or estimated maximum height) of the existing and proposed buildings/structures heights. The only reference to height in the document pertains to the proposed fencing and only mentions that fence height and setbacks will be considered to minimize impacts to the surrounding neighborhood. The new structures have greater potential for visual impacts. The maximum height per the zoning is 80 feet. Will any of the structures exceed this height, e.g. the 4th digester tank? If so, a height waiver will be required. Is there still an active flight path from Barber's Point over the site? If so, an FAA Obstruction Evaluation / Airport Airspace Analysis (notice of proposed construction form) will be required.

Response: Acknowledged. The description provided in Section 5.11.3 states, among other things, that “The proposed project, regardless of the alternative, would include new structures that would be consistent with the industrial character of the existing facility.” It is not expected that digester tanks will exceed 80 feet. Should any other structure need a height variance or other special approval, then the appropriate processes will be followed. The various details of the heights of the project are subject to change, but the current information available does not indicate there will be a significant change to the general description of the action, the significant impacts or the mitigation measures for the project.

16. Sections 4.1.7 Electrical and 5.13.4.1 Electrical and Communication Services, Existing Setting and 5.13.4.2 Electrical and Communication Services, Construction Impacts and Mitigation Measures – Recommend cross-referencing these sections. Please clarify whether the existing electrical distribution is overhead or underground – the text indicates both. Recommend adding a statement about the adequacy of the existing Hawaiian Electric Company (HECO) source or HECO in combination with other alternative energy sources to meet the project needs.

Robert Kroning
March 23, 2017
Page 7

Response: Cross-referenced applicable sections. Included text identifying HECO upgrades may be required to handle additional secondary power requirements. There are both underground and overhead lines within the WWTP boundary.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', with a stylized flourish at the end.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

From: John Bond [<mailto:ewabond@gmail.com>]

Sent: Wednesday, May 25, 2016 2:41 PM

To: Symonds, Anne <Anne.Symonds@aecom.com>; molaes@honolulu.gov; jpbuk@honolulu.gov; Mayor Kirk Caldwell <mayor@honolulu.gov>; ethics@hawaiiethics.org; oeqchawaii@doh.hawaii.gov; Bob Stanfield <bstanfield@honolulu.gov>; Atta, George I <gatta@honolulu.gov>; Timothy Hata <thata@honolulu.gov>

Subject: Important Historic and Cultural sites in Ewa Being Destroyed

Aloha,

No Environmental Assessments, surveys, archeology. None have any awareness of historic or cultural significance. Plans to knock down historic WW-II fence, destroy cultural features. No Iwi Kupuna monitoring. City, State, SHPD doing NOTHING.

There are iwi kupuna burials that are being destroyed.

The contractors are totally unaware of any historic or cultural sites they are destroying. Among them historic Ewa Plantation home sites and site of famous WW-II Army unit.

We have a documented history of the 369th Army AA being at this site. They were a very famous all black (colored - negro) Army unit from Harlem, New York. Highly decorated in WW-I and also a concern of FDR's wife that such units were well treated and had a role in WW-II defense.

I have documented histories of Ewa Villagers and their stories about the 369th at Ewa Villages C and Mill camps, which were adjacent to their army camp at this site.

This will be a big story during the 75th Anniversary of Pearl Harbor and we plan to invite the POTUS to attend the Ewa Battlefield commemoration.

John Bond
Ewa Historian

Just a heads up that the Ewa Plain Battlefield (Ewa Mooring Mast Field)

was listed in the National Register of Historic Places on May 23, 2016.

National level-Criterion A and D. Look for an official posting on an upcoming

Weekly List of Actions.

Paul R. Lusignan
Historian, National Register of Historic Places
National Park Service
[202-354-2229](tel:202-354-2229), fax [202-371-2229](tel:202-371-2229)



C Camp

Oahu Railway

**Plantation
Barracks**

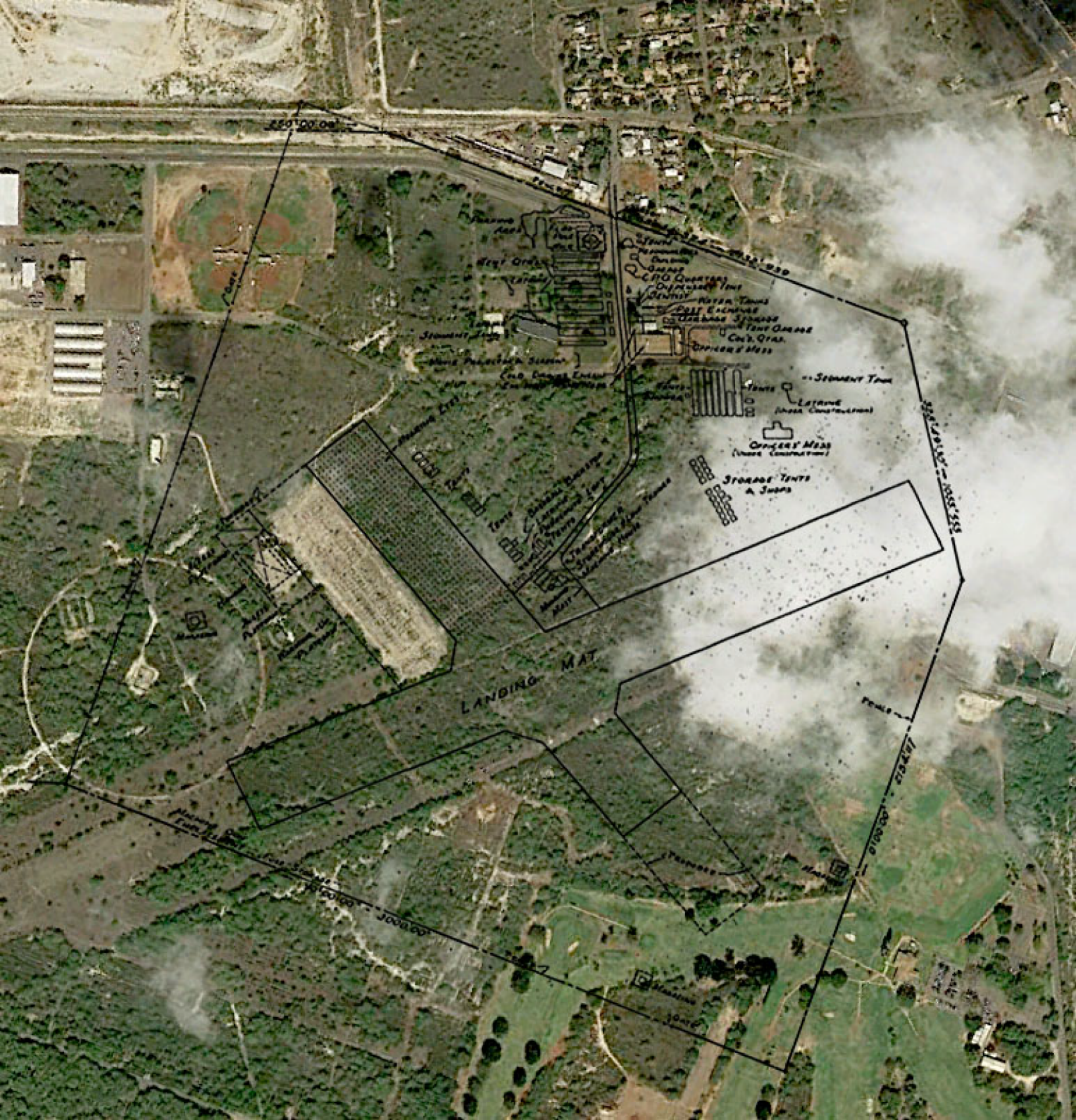
Roosevelt

Runway

Kalo'i Gulch











From: John Bond
To: jbobuk@honolulu.gov; [Bob Stanfield](#); [Symonds, Anne](#); [Olaes, Marisol](#); [Owens, Markus](#)
Subject: Report on City Parcel History Related To WW-II 369th AA Regiment
Date: Thursday, June 23, 2016 3:14:10 PM
Attachments: [369th Photos.pdf](#)
[369th.pdf](#)

Report on City Parcel History Related To WW-II 369th AA Regiment

What started out to be a general comment of the draft EIS on the City expansion of the Honouliuli Waste Water Treatment Plant evolved into a larger cultural social history of early Jazz music in Hawaii, the Roosevelt's influence on military deployment of a unique African American unit from New York and the air defense of MCAS Ewa during WW-II.

I can tell you this isn't all to the story but I had to get this done by today to make the deadline.

John Bond

Hawaii History of the 369th

By John Bond, Ewa Historian

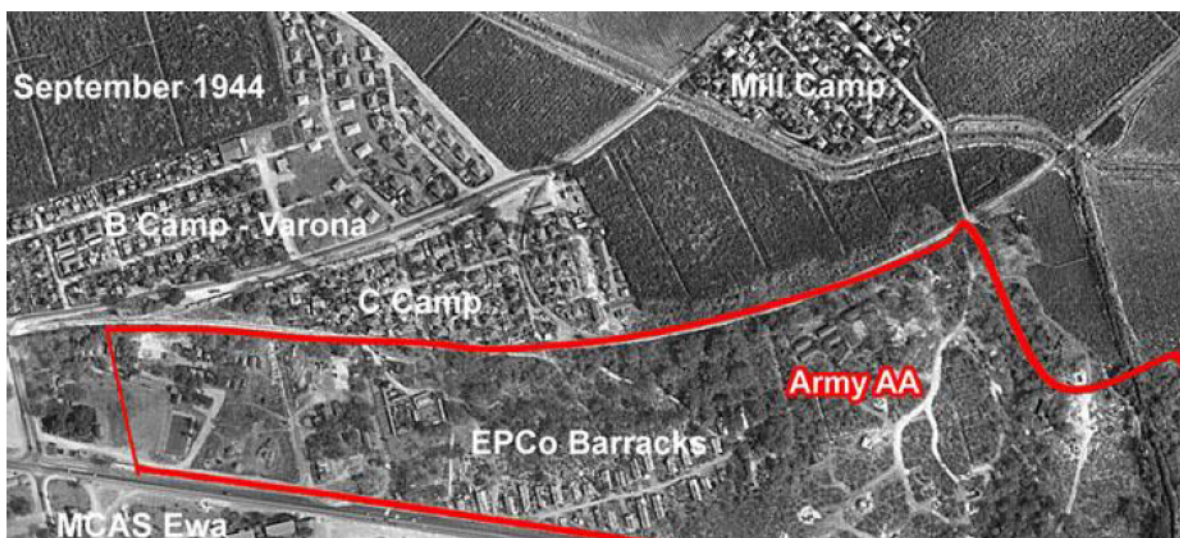
After the nomination of Ewa Battlefield to the National Historic Register on May 23, 2016 and the upcoming 75th Anniversary of Pearl Harbor in December, it is timely to bring to attention a unique facet of the Ewa Battlefield post-attack air defense history which involves the famous and highly decorated 369th African American Infantry Regiment from Harlem, New York City.

The 369th was not involved or located in Hawaii at the time of the December 7, 1941 attack by Japanese aircraft on the Ewa area. However, the unit was Federalized and converted from Coast Artillery to Anti-Aircraft Artillery and sent to Hawaii to become an historically noteworthy part of the MCAS Ewa history through the subsequent air defense of MCAS Ewa and the Ewa Plain in 1943-44.

The Ewa Plain Battlefield as nominated to the National Historic register is located in the southwestern corner of Oahu, Honolulu County, in a geographic area referred to as the Ewa Plain, approximately 5.5 miles southwest of Ford Island (middle of Pearl Harbor).

While the Battle of Ewa Plain encompasses three main population centers: Ewa Field, Ewa Villages, and Ewa Beach, the 1941 Ewa Field retains sufficient architectural, archeological, and/or landscape integrity to convey its historical significance. This includes retaining its integrity of location, setting, design, and association. The site is also capable of revealing additional archeological discoveries.

Unfortunately due to limited time and research capabilities in order to meet a project draft EIS comment deadline we are not yet able to completely confirm by specific Army records that the famous 369th was had Anti-Aircraft elements stationed by MCAS Ewa in 1944.



Area between MCAS Ewa and Ewa Plantation Camps identified as likely 369th AA battery sites

However a research survey of 1943-44 print media and local Ewa Village oral history all point to the unique segregated 369th African American Army unit that was distinctive from all other Army military units during that time. Limited research has discovered photos and written news articles spotlighting the 369th, when wartime security and censorship did not allow specific base defense locations to be named. Army photos were shot or cropped to eliminate identifying backgrounds and private photography was strictly prohibited.

Just prior to the start of the Pacific War in 1940 the 369th was a New York National Guard infantry Regiment that was Federalized and converted from infantry into a coast artillery (CA) regiment. They were then retrained again in 1942 to become an Anti-Aircraft (AA) regiment and sent to the Hawaiian Island of Oahu to protect military airfields in 1942-44 with various caliber Anti-Aircraft (AA) guns. The 1941 Ewa Field had no AA defense and nearly all of its planes were destroyed by the attacking Japanese naval air force on December 7. By early 1942 the rapidly expanding MCAS Ewa had massive numbers of air operations for both Marine and Navy aircraft of all types and quickly became the hub of Marine air operations in the Pacific.

The 369th Regiment arrived on Oahu on June 21, 1942 and units were subsequently posted to man AA defenses at Kahuku Army Air Base, Ōpana Radar Station, Camp Malakole, Haleiwa airfield, Mokuleia Army Airfield and Marine Corps Air Station Ewa. They remained organized as segregated Army units which was actually more of a benefit rather than a racial disadvantage. There are mentions of the unit in the book "The First Strange Place: The Alchemy of Race and Sex in WWII Hawaii," by Bailey and Farber who use the example of the 396th Coast Artillery (AA) Regiment, then more commonly referred to as "The Harlem Hellfighters" to illustrate the 1940's era racial tensions. White soldiers from Southern states often derided black soldiers for not knowing "their place" and resented the extra racial space accorded blacks in Hawaii's multicultural milieu.



Members of the 369th jazz and swing band out on the Royal Hawaiian Hotel beach front

It is important to know that President Franklin D. Roosevelt was a politically progressive administration with an especially socially and politically activist wife- Eleanor Roosevelt. She especially pushed for social reforms for African Americans and their advancement through the war effort. The Roosevelts had first visited Hawaii in 1934 and saw the islands as the future of racial tolerance and a link to the culture of Polynesia and Asia. At the same time Japan sought to gain cultural control of the Hawaiian Islands as well as encourage blacks to revolt and overthrow white culture. The military Martial Law government promoted racial tolerance among the military in Hawaii as a cultural experiment and as the best way to not disrupt the war effort. As directed from the highest levels the army's newspaper in Hawaii transformed itself into a "steady instrument for racial progress."



Eleanor Roosevelt during one of her WW-II Hawaii visits getting an ID card

While under Martial Law, the Hawaii authorities enforced a mixed desegregation policy against race discrimination while still keeping segregated "colored" army units. This was an experimental mix of semi-segregation with buses, theaters and chow halls not segregated while personal services like barber shops remained segregated. Whites who did not like this policy had to live with it as the military police were ordered to protect colored soldiers rights if necessary. For the 369th "Hellfighters" unit members they were always ready to fight if necessary earning them a reputation of respect on the streets of wartime Honolulu. This also caused some wartime colored army members to wear the insignia of the 369th when off duty in the downtown and Waikiki area.

Some of the first desegregation of US military units happened in Hawaii and was very likely a policy strongly influenced by FDR and his socially activist wife. Research has indicated that FDR and Mrs. Roosevelt knew of the 369th unit's special New York Harlem history and likely arranged to have them serve in Hawaii in a special segregated unit capacity to allow them to retain their unique military heritage and not be sent to southern states which presented many racial conflicts for black soldiers during WW-II. FDR visited Hawaii twice and Mrs. Roosevelt several times during WW-II as a Red Cross representative. In July 1944 FDR toured MCAS Ewa and other Oahu bases in a convertible sedan sitting with Admiral Nimitz and General MacArthur. Eleanor Roosevelt was known to visit a wide variety of military installations, including internment camps, colored segregated Army units as well as troop hospitals.

The president's wife was also concerned with giving colored soldiers the same military service opportunities as white troops which resulted in the formation of an air unit that became known as the Tuskegee Airmen. This may also explain why a widely circulated Army wartime photo (below) shows the Under Secretary of War Robert Patterson and Lt Gen Robert Richardson (then military governor of Hawaii) inspecting 369th troops and then greeting Col. Chauncey Hooper, commanding officer of the 369th with Lt. Col. Harry B. Reubel, executive officer. Hooper retired as a brigadier general in the New York National Guard in 1954. The first Black American to be promoted to the rank of brigadier general, Benjamin O. Davis had served as commander of the 369th Coast Artillery prior to the start of WW-II. His son Benjamin O. Davis Jr. became commander of the World War II Tuskegee Airmen and retired a four star general in the US Air Force in 1998.



Under Secretary of War Patterson, Lt Gen Richardson, Col. Hooper, and Lt. Col. Reubel 1942

When the 369th arrived on Oahu in August 1942 (then often called a colored or negro army unit) they were already quite unique and extremely proud of their WW-I Harlem Hell Fighters military history. Their well-educated African American officers and also non-commissioned officers which included talented jazz musicians from the New York Harlem community then known as the capital of African American culture and jazz music. The 369th quickly found local social acceptance for their musical talents by being invited to play at the Royal Hawaiian Hotel in Waikiki at a time when swing and jazz was extremely popular war era music.



Jazz and Swing music was especially popular among WW-II troops and sailors

The 1944 air photos of MCAS Ewa document their reinforced AA gun battery positions constructed with brick, mortar and sandbag protected 90 MM guns and smaller 50 Cal. Machine guns between the Ewa Marine airbase and Ewa Villages. There is also a hand drawn map created after the war by a retired Marine military police officer showing the location of the Army artillery unit camp. The location today is near the current Hawaiian Railway Society railyard museum and in an area behind the Honouliuli Waste Water Treatment Plant. It is on this current City own property that is conducting a draft EIS and which brought about the research into the Army unit that occupied the gun positions.

During WW-II this same City parcel area was at the end of the main MCAS Ewa runway and location of the Marine base headquarters and base flag pole. Archeological evidence of the AA battery sites and barracks still exist however primarily in small pieces of brick, mortar and concrete over subsequent post war surface land use for general small agriculture. Ground penetrating radar and other archeology methods today would likely reveal more subsurface evidence. While trail evidence would be difficult to find today, the 1825 Malden Royal Navy trail map shows this City parcel as being a very likely route of the Oneula Beach segment of the ancient Hawaiian trail route. Ewa oral histories indicate that this trail was

still used by the Ewa Plantation community up until the late 1930's to reach the beach dunes for shoreline fishing and limu picking.

The AA artillery base camp site on the City parcel currently under review as an expansion of the Honouliuli Waste Water Treatment Plant is on a relatively flat karst, ancient coral reef slope between General Geiger road and the Oahu Railway track now on the National Historic Register. Ewa Villages are on the State historic register as well as the Hawaiian Railway Museum rail yard.

The MCAS Ewa Field – Ewa Battlefield area now placed on the National Historic register covers all of this battlefield area as a potential Ewa Historic Battlefield District, as mentioned in the Ewa Battlefield nomination. It is very possible that this parcel contains evidence of the December 7, 1941 attack on the Ewa airfield and villages revealing Pearl Harbor fired inbound 50 Cal. and larger anti-aircraft artillery shells as well as spent Japanese 7.7 MM machine gun shells. Such spent munitions have been found in adjacent land parcels. Many local residents report finding many Ewa battlefield ammunition artifacts and are still finding them in tall grass and surface disturbed areas.

In some of the parcel areas it is apparent that there were low mounds of red imported dirt that was brought in to use for building the artillery gun positions and leveling areas for the Quonset huts. Karst sink holes, some filled with very old bottles and broken ceramic eating implements exist in the area as well as land subsidence indicating subsurface water flow well known in the Ewa Plain. In some places large trees flourish which are typical Karst indicators of subsurface water channels and caves holding water. Even in such difficult environments tiny Opae Ula fresh water shrimp have been found. In older times Karst sinkholes were used for Hawaiian burials and Ewa Village oral histories report seeing bones (iwi) in holes and caves as not unusual in this same area.

The 1944 air photos show at least 6 or more Quonset huts placed close together. Quonset hut corrugated roof sheets can be found as well as remnants of military chain link fencing. Also found was a concrete curb with Army style letters on it indicating a possible staff parking location. Other ground evidence includes small pieces of red brick and mortar typical of AA gun emplacements that were built possibly sometime in 1944 to emplace heavy AA guns like the 120 mm (4.7 inch) gun) and possibly 40 mm automatic weapons for close-in air defense and M51 Quad .50 caliber machine guns. Elements of the 369th were known to have such air defense weapon systems placed around MCAS Ewa and coastal areas.

In WW-I the 369th was a highly decorated infantry unit fighting in France, receiving the French Croix de Guerre with Silver Star. The unit history goes back to 1840 and their New York City Armory in Harlem is on the National Historic Register. The 396th Coast Artillery (AA) Regiment from the New York National Guard was Federalized 13 January 1941 and converted into the 396th AAA (Gun) Battalion for the heavy guns (90 mm) and the 870th AAA (Automatic Weapons) Battalion for the 40 mm automatic weapons and .50 caliber AA machine guns around the end of December 1943. Both units later served in the Okinawan Campaign in 1945 on the little island of Karma Retto some 30 miles south of Okinawa. After

the war the units returned to New York and still train and operate as the 396th Sustainment Brigade. There is a "Harlem Hell fighters" book published in 2014 by author Max Brooks.

The 369th was by all accounts a very sharp Army unit lead by well-educated black officers and from Harlem, the center of the 1930's black American cultural renaissance. James Reese Europe as the leader of the 369th Infantry Jazz Band, also known as the "Hellfighters," introduced the sounds of American ragtime to Europeans during World War I. Although his career was brief, he profoundly influenced the course of popular music in the United States and throughout the world. <http://www.redhotjazz.com/hellfighters.html>

In addition the musical influence of James Reese Europe's bands reached the New York high society including the Roosevelts which in turn likely created the political conditions for the 369th to be sent to Hawaii during WW-II. Interestingly also is that the sounds of the 369th American ragtime influenced European musicians who then later influenced Hawaiian slack key musicians such as Gabby Pahinui who had a strong interest in jazz music.

This unit was well remembered by local Ewa Villagers because they were very proud and very friendly, handing out treats and inviting neighboring plantation villagers to watch the latest Hollywood movies at their artillery basecamp next to Ewa Villages (B, C and Mill village camps.) They used the Ewa Plantation swimming pool, sports facilities and were seen at the local Ewa Community Church attending Sunday services. They were especially known for their "hep cat" style of lyrical speaking. This was the first experience most in the multi-ethnic Ewa plantation community ever had with African Americans and they were invited to share all the local Ewa community facilities and attend the local churches.

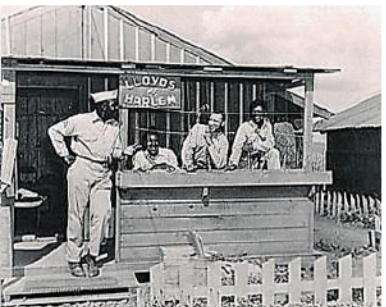
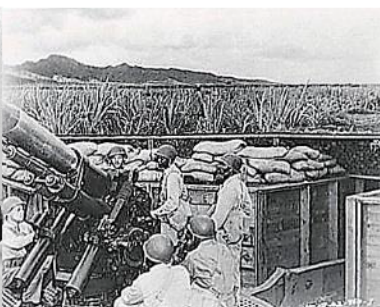


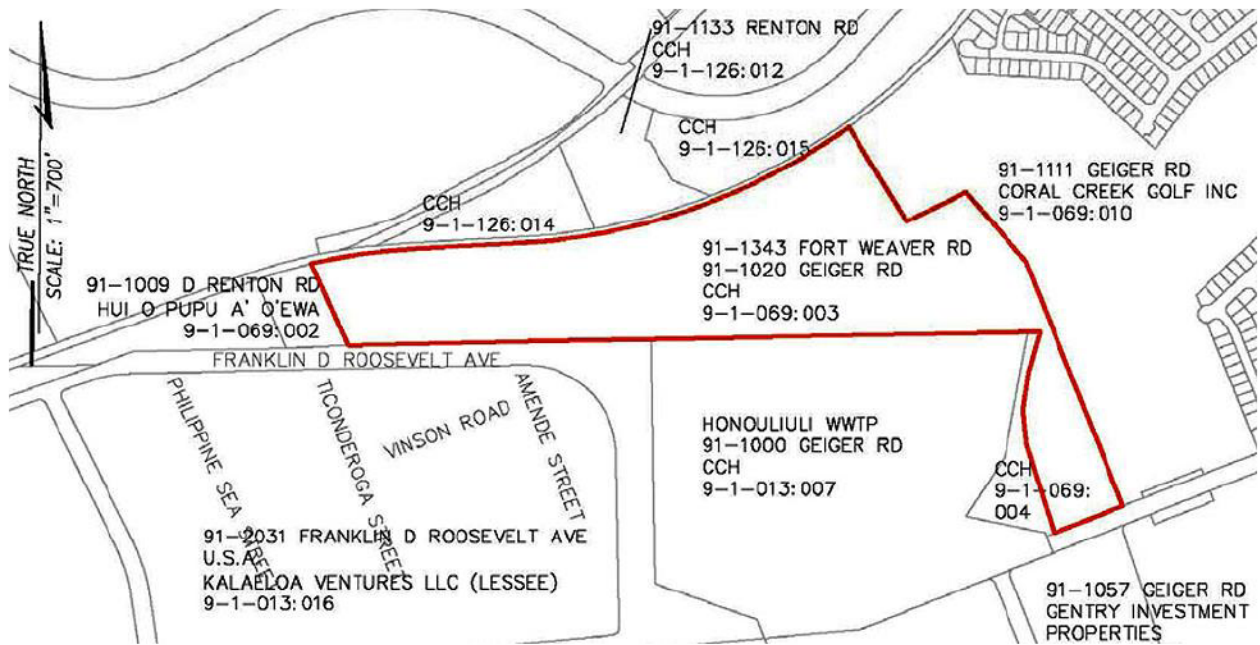
<http://www.redhotjazz.com/hellfighters.html>

"The First Strange Place: The Alchemy of Race and Sex in WWII Hawaii," by Bailey and Farber

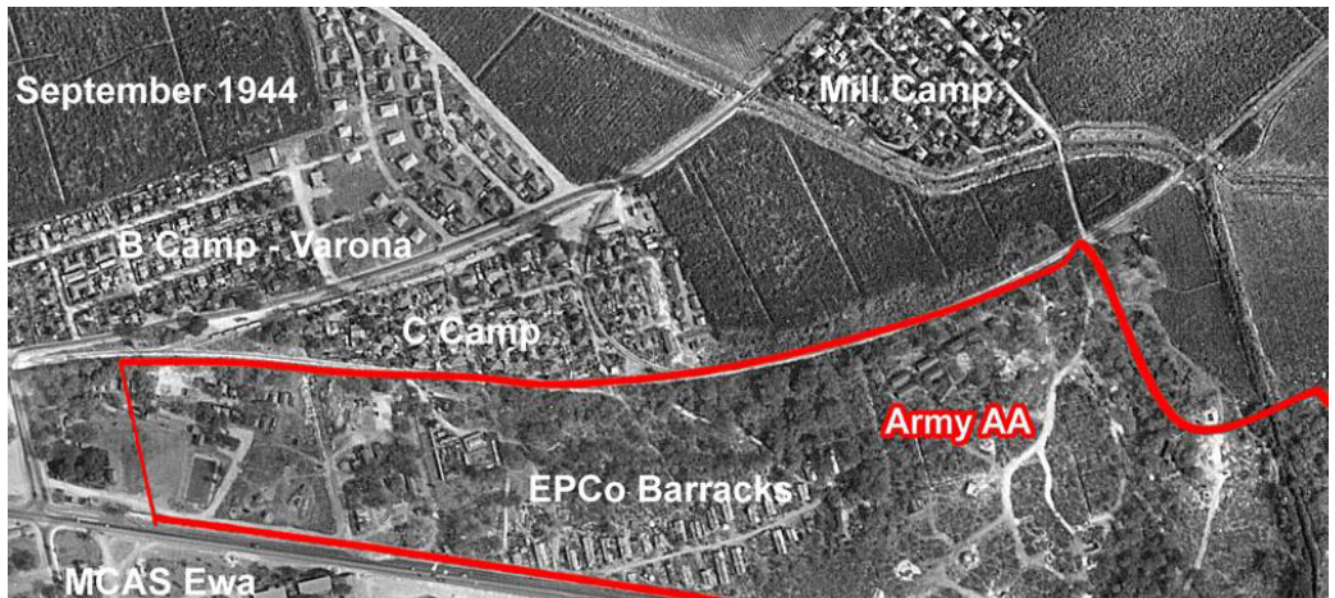
Also see: African Americans in Hawai'i - By D. M Guttman

369th Photos and Maps





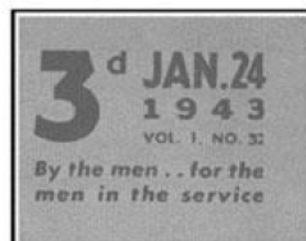
City & County of Honolulu parcel planned for Honouliuli WWTP Expansion



September 1944 air photo shows the City parcel next to the Oahu Railway line and Ewa Villages used primarily by the earlier pre war EPCo barracks, pig and poultry farms and the WW-II era Army AA Air Defense gun batteries protecting MCAS Ewa. Several roads connected the Army areas with the plantation community as there were recreational facilities, food/dry good stores and restaurants available. The MCAS Ewa airfield was a high security fenced base with two main Ewa entrance gates through General Geiger Rd and North Hansen Rd (later named Roosevelt Avenue.)



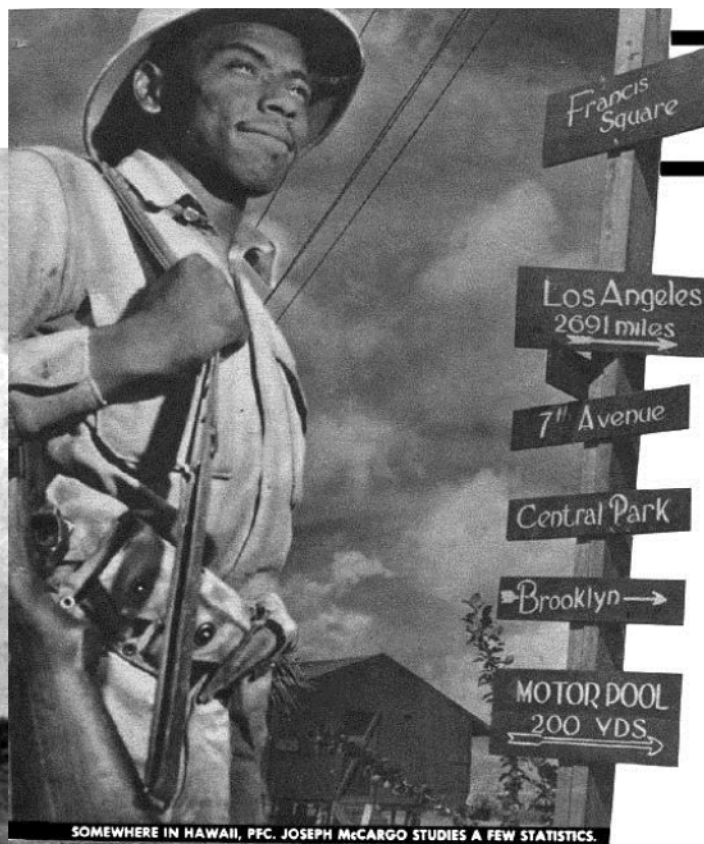
WITH BEATRICE ARE PFC. BROWN AND PVTS. WHITE, BENNETT, HUMPHREY AND BROWN.



When they marched into Germany after winning the Croix de Guerre at the Meuse-Argonne offensive, they called this outfit "Harlem's Hellcats." Now they're a "Pineapple Army," the only all-Negro combat unit in Hawaii, where they are marking time before another march—into Japan.



BEATING IT OUT: PFCs. FLORES, BECKHAM, ALFORD, BRISTON.



SOMEWHERE IN HAWAII, PFC. JOSEPH McCARGO STUDIES A FEW STATISTICS.



World War I Harlem Hell Fighters On Return From Europe



The 369th converted into light and heavy Anti-Aircraft air defense units guarding Oahu airfields

From: John Bond [mailto:ewabond@gmail.com]

Sent: Friday, August 5, 2016 10:22 AM

To: Pobuk, Jack <jpobuk@honolulu.gov>

Cc: Symonds, Anne <Anne.Symonds@aecom.com>; Olaes, Marisol <molaes@honolulu.gov>; Owens, Markus <mowens@honolulu.gov>

Subject: Re: Major Untold Pearl Harbor to Midway Battle Formation Revetment Story

Aloha Jack,

The Honouliuli WWTP is where the 1825 Malden map shows the One'ula trail likely going through and following the Kalo'i Gulch to the sea. Even though no likely remnants today, I have heard several old Ewa Village residents talk about and seeing caves with iwi in them. Also after heavy rains the iwi appears in that area. I saw several sinkholes and evidence of bigger underground sinkholes in the back areas towards the Oahu Railway tracks. The trail likely would have been on the eastern side of the City WWTP property closer to the Kalo'i waterway which was later totally reconstructed after the mill was shut down and turned over to the City.

The 1997 Navy BRAC Tuggles Reports also shows a Cultural Landscape Map of the other part of the trail - the Kualaka'i (runs to Nimitz Beach) section which goes right through where the Ka Makana shopping Center is, where it runs through MCAS Ewa and down Coral Sea Road. We have seen the remnant of the trail in there. Lots of native plants, Wiliwili trees, Ti growing out of sinkholes and also burial caves.

The 1825 map shows the trail originating out of Honouliuli and then forking approximately where the Ewa Villages Golf Course Club house is today. One fork went south east (Oneula) and one went south west (Kualaka'i).

I personally believe that when the Ewa Mooring Mast and later Ewa Field was constructed that the civilian engineers of the day for the Navy knew all about this and located the base between the two trails to do what they could to preserve them as traditional rights of way. It also makes total sense from a fishing/gathering perspective of the communities of that time.

Below is my blog about this (one of many) back in 2014 and I include many of the maps, including Tuggles, showing this. The evidence of the Kualaka'i is still very visible today. I think the Coral Creek Golf Course largely wiped out the Oneula trail remnant. Especially all trail habitation areas around Haseko were totally destroyed.

You can use these maps from the blog if you like in any final report.

John Bond

Ewa Plains 1825 Malden Trails - Important Hawaiian Cultural History Still Being Denied

<http://kanehili.blogspot.com/2014/06/ewa-plains-1825-malden-trails-important.html>

On Fri, Aug 5, 2016 at 9:26 AM, Pobuk, Jack <jpobuk@honolulu.gov> wrote:

John,

Thank you for this information.

This is interesting background information for what we regard as a neighbor to the Honouliuli Wastewater Treatment Plant (WWTP). It appears that the revetments are located around the Ewa Field - MCAS Ewa area, and none were located within the boundaries of the current WWTP property.

We will keep this information on file.

Thanks,

Jack

768-3464

From: John Bond [mailto:ewabond@gmail.com]

Sent: Thursday, August 04, 2016 11:07 PM

To: Pobuk, Jack; Anne.Symonds@aec.com; Olaes, Marisol; Owens, Markus

Subject: Major Untold Pearl Harbor to Midway Battle Formation Revetment Story

MCAS Ewa TMK To Become Future City Park Also Contains Major Midway Battlefield History. NPS Battlefield Grant Will Help Document Sites

Aloha,

There is a BIG Pearl Harbor to Midway Battle story never told about why the 75 Ewa dome revetments were built and it takes place between December 8 at Ewa Field and June 4 at the Battle of Midway in 1942. A \$63,000 NPS Battlefield Grant will help identify the still existing early 1942 revetments where Navy and Marine planes left directly for the Island of Midway. In addition, actual surviving Midway planes have been tracked back to NAS Miami. <http://ewabattlefield.blogspot.com/>

The Battle of Midway can be clearly seen as the US response to the attack on Pearl Harbor and no place on Oahu can this history be more clearly seen than at Ewa Field - MCAS Ewa. Nearly all of the Marine and many of the Navy carrier wing planes were at Ewa Field in these early 42 revetments. Midway is considered by many Navy historians as the most important battle in US Navy history- and these Midway battle formation revetment sites still exist at former MCAS Ewa.

Revetments were built in early 1942 all over Ewa Field, including the very first dome prototype. Several other geometric variations were also used. There were a large number constructed, likely for up to three

carrier wings of Navy and Marine planes because NAS Barbers Point was not ready. The sand bag and stucco revetments that still survive are of the earliest designs with crushed coral taxiways and asphalt parking pads. They can still be found along with many other artifacts.

The Japanese carriers and planes lost in what some consider a miracle or incredibly fortunate battle for the US at Midway - as December 7 Pearl Harbor was for the Japanese naval air forces- are all intricately tied into these early revetments and airplanes. Many of the Japanese carriers, planes and pilots lost at Midway were the same ones that attacked Ewa Field and Pearl Harbor!

No other existing place on Oahu still contains the physical evidence of the first six months of US response to December 7, 1941 than the still existing MCAS Ewa Field sand bag and stucco revetments. These revetments carried through to the final domed revetment designs which ironically were largely no longer needed because the Battle of Midway in June 1942 eliminated the Japanese naval threat to Hawaii and the Pacific Coast.

John Bond
Ewa Historian

From: John Bond [<mailto:ewabond@gmail.com>]

Sent: Friday, August 5, 2016 10:37 AM

To: Symonds, Anne <Anne.Symonds@aecom.com>; Olaes, Marisol <molaes@honolulu.gov>; Owens, Markus <mowens@honolulu.gov>; Pobuk, Jack <jpobuk@honolulu.gov>; Bob Stanfield <bstanfield@honolulu.gov>

Subject: Honolulu City Council RESOLUTION 12-172, CD1 (2012) passed unanimously:

Honolulu City Council RESOLUTION 12-172, CD1 (2012) passed unanimously:

**URGING THE HAWAII COMMUNITY DEVELOPMENT AUTHORITY AND
THE STATE OF HAWAII TO RECOGNIZE AND PRESERVE THE HISTORIC
TRAILS OF THE EWA PLAINS.**

WHEREAS, the trails in the Ewa Plains area later known as Marine Corps Air Station (MCAS) Ewa and Naval Air Station (NAS) Barbers Point, and today called Kalaeloa as administered by the Hawaii Community Development Authority, are part of the greater Ewa Plains of West Oahu; and

WHEREAS, the Ewa Plains is a massive ancient karst coral reef where ocean meets mountain streams and fresh rain water percolates through porous 100,000 year old coral to spawn freshwater shrimp and one of Hawaii's most diverse limu varieties; and

WHEREAS, these Ewa Plains trails and their adjacent historic sites provide clues as to how communities were linked socially, economically, and politically; which

areas were important in early times, places of commerce, and religion; and where valuable forest or sea resources were once located; and

WHEREAS, these Ewa Plains trails were first identified after Western contact by Lieutenant C.R. Maiden of the Royal Navy in 1825 and became known as the Maiden Trails on the first published Oahu maps; and

WHEREAS, these Ewa Plains trails identified by Maiden became used for ranching and horseback transportation and became an indelible part of West Oahu's 150 year old Paniolo and Pa'u horseback culture and early Hawaiian Kingdom history of ranches and farms which were the original Western economic settlements of the Ewa Plains; and

WHEREAS, these identified trails became the location where the Ewa Mill and Plantation was established and why the Oahu Railway was extended to this very important trailside agricultural community which allowed sugar cane to become the major economic engine of the Ewa Plains; and

WHEREAS, these Ewa Plains trails in 1925, due to the nearby location of Ewa Mill and the Oahu Railway, became incorporated into the United States (U.S.) Navy development of Ewa Mooring Mast Field as a naval airship mooring site; and

WHEREAS, these trails, springs, and underground karst water transport system later became further documented in State and Federal land surveys and aquifer maps, and in 1941 when the Ewa Mooring Mast Field became a U.S. Marine Corps airbase known as Ewa Field, these walking and horse ranch trails continued to be used by the Marines and Ewa Plantation community for access to the shoreline; and

WHEREAS, after the Japanese air attack on December 7, 1941 and the great expansion of the area into military airports which became MCAS Ewa and NAS Barbers Point during World War II, these trails were important for military training, patrols on foot and mounted Marine Corps horseback security patrols; and

WHEREAS, after the closure of the Marine and Navy airbases, published 1950s maps show the trails on former MCAS Ewa that are still used today by the Barbers Point riding club; and

WHEREAS, these historic horse and foot trails also link with the over 100 year old Oahu Railway right-of-way and Pearl Harbor Historic Trail plan that allows travel by foot, horse or bike from Pearl Harbor to Nanakuli, and which places the Ewa Plains trails as a center junction point and provides access to the Ewa shoreline; and

WHEREAS, an educational feature of these Ewa Plains trails could also be restored

karst sinkhole sites along the trailways explaining the ecological system that sustains the iimu, nourishes food sources such as freshwater shrimp and which helps perpetuate Ewa's offshore fisheries and sustainability; and

WHEREAS, these trails' could become a cultural, historic, recreational and educational experience of walking, biking or horseback riding over trails featuring native Hawaiian plants, bird and aquatic life, telling cultural histories, explaining geological facts; and

WHEREAS, an Ewa Plains historic trails project could be a community supported endeavor bringing together cultural practitioners, educators, scientists, environmental and veteran organizations in a positive, holistic concept for community education, recreation and restoration; and

WHEREAS, recreational trails in Ewa could qualify for federal National Park Service (NPS) Recreational Trails Program funding, as well as Surface Transportation Program Flexible, Transportation Enhancement, and Congestion Mitigation Air Quality Improvement Program funding and would be consistent with the Oahu Regional Transportation Plan; and

WHEREAS, federal programs such as the NPS Service Battlefield Protection Program have already awarded a \$53,000 grant to help define the Ewa Field battlefield as an historic site, and which could include walking trails and points for historic interpretation; and

WHEREAS, federal programs such as the U.S. Fish & Wildlife Service have programs to restore Ewa Plains karst sinkholes and have already demonstrated that native freshwater shrimp can be restocked and flourish in these unique karst sinkhole habitats, providing working environments for education and training; and

WHEREAS, there are many interested individuals from equestrian clubs, biking, recreational groups, schools, colleges and universities, active duty military family and morale, welfare and recreation organizations, that could benefit from and assist in supporting an Ewa Plains trails program; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that it supports the mapping and identification of historic trails in the Ewa Plains; and

BE IT FURTHER RESOLVED that the Hawaii Community Development Authority, the State of Hawaii, the United States government, and the City and County of Honolulu are urged to participate in the mapping and identification of the Ewa Plains historic trails; and

BE IT FURTHER RESOLVED that the City and County of Honolulu will not expend any monies to provide for the mapping and

BE IT FINALLY RESOLVED that copies of this Resolution be transmitted to the Hawaii Community Development Authority, the Governor, the Department of Hawaiian Homelands, the Office of Hawaiian Affairs, the President of the United States, the Commander of United States Pacific Command, and the Mayor.

DATE OF INTRODUCTION: 2012 (Passed unanimously 2012)

INTRODUCED BY:

Councilman Tom Berg

From: John Bond
To: contactus@hbws.org; [Symonds, Anne](#); [Pobuk, Jack](#); [Stimpson, Matthew](#); [Olaes, Marisol](#); [Arlene Campbell](#)
Subject: Site of MCAS Wing HQ and Flagpole Area at Honouliuli WWTP
Date: Sunday, January 01, 2017 10:29:06 PM
Attachments: [1 Google-1.ipa](#)
[9-30-1944 0.ipa](#)
[1944 Wing HQ.ipa](#)
[1962.jpg](#)
[Bina-1.ipa](#)
[1999 H WWTP FEA.ipa](#)

Site of 1944 MCAS Wing HQ and Flagpole Area at Honouliuli WWTP

Happy New Year

By chance researching the 1825 Malden Hawaiian Trails through Ewa I finally figured out the realignment of Geiger Road and how the Honouliuli WWTP was laid out. In particular if there was any regard to former the historic MCAS Ewa HQ and flagpole.

Map overlay from final 1948 MCAS base map shows that when the Honouliuli Waste Water Treatment Plant was built and road realigned that the original 1944 MCAS Ewa Wing HQ site was used for the WWTP maintenance HQ and administrative buildings.

In particular, the site of the base flagpole was in fact preserved. However there is absolutely no record or mention of any of this anywhere in the WWTP EA documents. It remains a mystery as to who did it this way - but possibly a former military (Navy?) engineer was consulted who knew what was previously there and designed this alignment.

The Honouliuli wastewater treatment plant was built around 1978. Sometime earlier the former MCAS Ewa buildings were taken down and the roadway realigned. However the later WWTP admin buildings were placed in alignment with the earlier MCAS Ewa buildings and kept the front HQ flagpole area as open space. This is shown with the red circle.

The red shows the original alignment of Geiger Rd. The blue shows the likely route of the original 1825 Malden Hawaiian trail that went to Oneula Beach. The trail ran north through Ewa Villages and then up to Honouliuli and the shore of West Loch.

Local Ewa Villagers have stated that in plantation times discovering bones in sinkholes was fairly common after heavy rains. There are large numbers of burials in sinkholes especially along karst waterways.

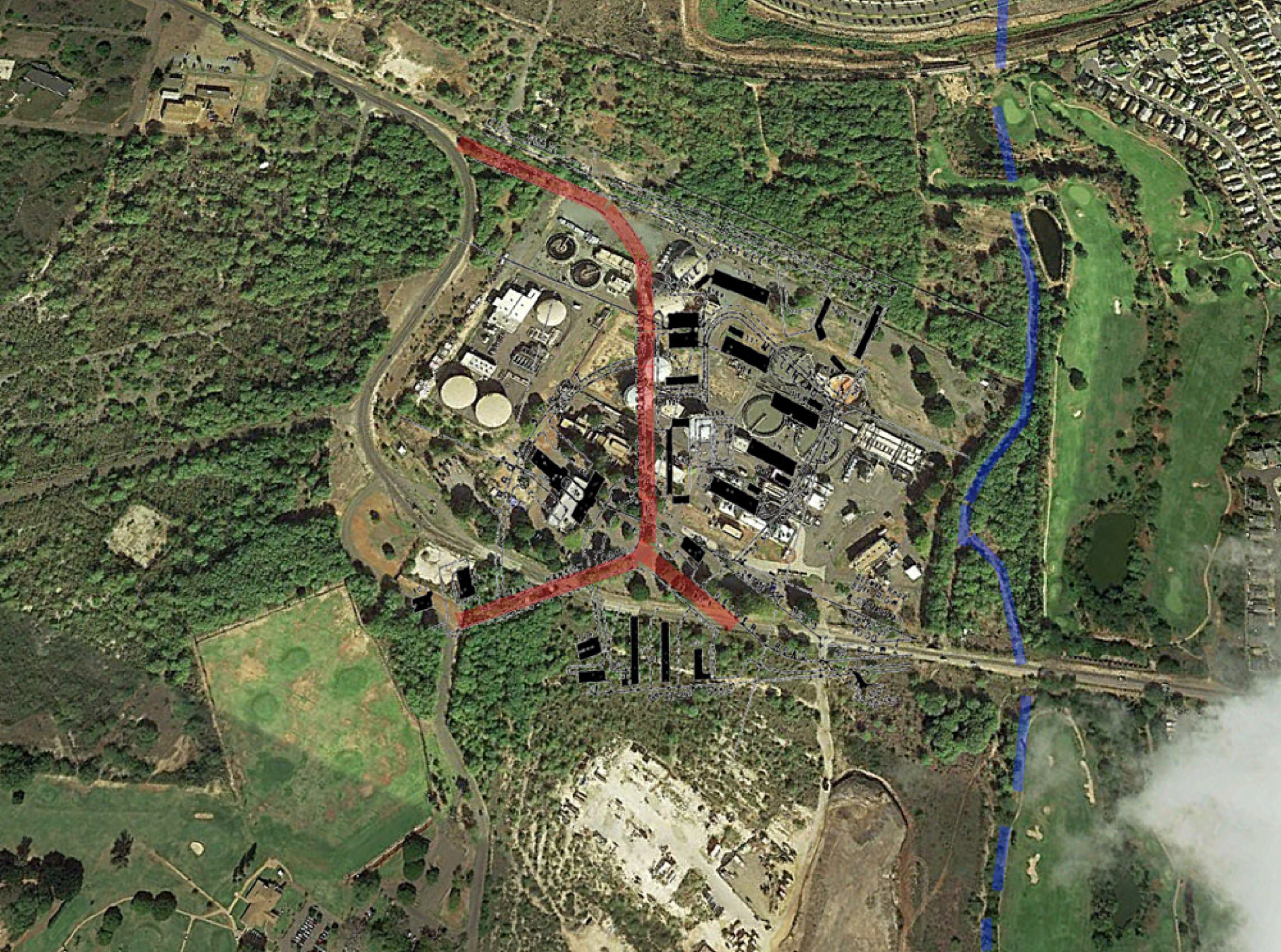
Note that the endangered Hawaiian Pueo as well as the Barn owl are found throughout this area near Kalo'i Gulch. It also attracts migratory water birds of many kinds. Open ground nesting space and water features should be preserved in this area to provide

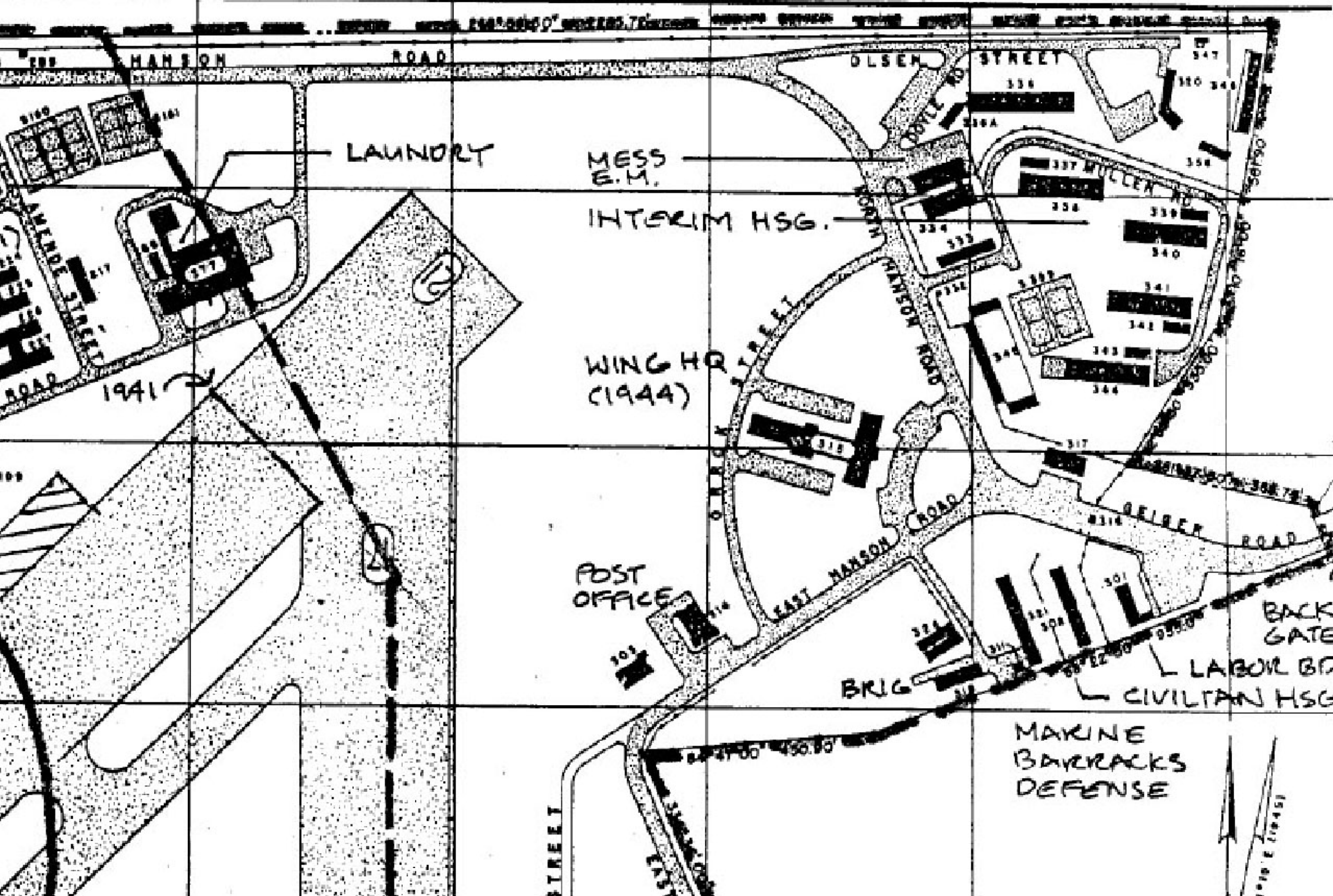
bird species habitat corridors from the mountains to the sea.

John Bond
Kanehili Cultural Hui
PO Box 75578
Kapolei, HI 96707

City scoops land for Honouliuli - (Actually City Insiders make a killing on super high property re-evaluation that City willing paid. Previously it was to be an industrial park. These insider land deals happen all the time in City and State projects where the tax-payers foot the land speculation costs.)

<http://www.staradvertiser.com/2010/09/09/business/city-scoops-land-for-honouliuli/>





HANSON ROAD

LAUNDRY

MESS E.M.

INTERIM HSG.

WING HQ (1944)

POST OFFICE

BRIG

MAKINE BARRACKS DEFENSE

BACK GATE

LABOR BLDG

CIVILTAN HSG

DOLSEN STREET

BOYLE STREET

MULLER ROAD

GEIBER ROAD

EAST HANSON ROAD

WING STREET

VALLENDE STREET

1941

1945



An archaeological reconnaissance survey of the entire WWTP site was conducted in 1975. No sites were identified.

Prehistoric surface remains are not expected within the project area due to impacts of residential and road development, ranching, sugarcane cultivation, and military activities. Because most of the pipelines will be buried in areas currently used as public rights-of-way, no surface sites or features are likely to be encountered. It is possible that excavations will expose sinkholes that have been filled in by alluvium moving downslope, numerous cultivation activities and by various residential and commercial developments. These sinkholes often contain archaeological deposits, including human burials. If any human remains are uncovered, all work will stop in the immediate area and members of the State Historic Preservation Division will be notified immediately. Should any sinkholes be uncovered, extreme care will be exercised, as human remains may be present.



DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-032

March 23, 2017

SENT VIA EMAIL

Mr. John Bond
ewabond@gmail.com

Dear Mr. Bond:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plan Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your email comments regarding the Honouliuli Wastewater Treatment Plan Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Statement (DEIS). The 45-day public comment period extended from May 8 to June 22, 2016; additional comments were received after the close of the comment period and are addressed in the responses below.

The emails received include the following.

Date	Email Subject Line	Attachments	Notes	Topics
May 25, 2016	"Important Historic and Cultural sites in Ewa Being Destroyed"	(7 attachments)	-	Possible damage to cultural sites; <i>iwi kūpuna</i> monitoring; possible WWII-period fence; and 369th AA Encampment
June 23, 2016	"Report on City Parcel History Related To WW-II 369th AA Regiment"	(2 attachments: 369 th Photos.pdf, 369 th .pdf)	Received after end of comment period	369th AA Encampment

Date	Email Subject Line	Attachments	Notes	Topics
August 4, 2016	"Major Untold Pearl Harbor to Midway Battle Formation Revetment Story"	(no attachments)	Received after end of comment period	Ewa Field revetments
August 5, 2016 (A)	"Re: Major Untold Pearl Harbor to Midway Battle Formation Revetment Story"	(no attachments; blog post link embedded)	Received after end of comment period	Ewa Plain historic trails
August 5, 2016 (B)	"Honolulu City Council RESOLUTION 12-172 CD1 (2012) passed unanimously"	(no attachments)	Received after end of comment period	Ewa Plain historic trails
January 1, 2017	"Site of MCAS Wing H and Flagpole Area at Honouliuli WWTP "	(6 attachments)	Received after end of comment period	MCAS Ewa HQ flagpole and road alignments; <i>iwi kūpuna</i> monitoring; and endangered Hawaiian Pueo, barn owl, migratory water birds, and habitat corridors

We offer the following responses to your comments. Some topics were mentioned across multiple emails, and some of the emails included comments on more than one topic. For these reasons, comments and their associated responses are grouped by topic.

Possible Damage To Cultural Sites

Comments:

"No Environmental Assessments, surveys, archeology. None have any awareness of historic or cultural significance. Plans to knock down historic WW-II fence, destroy cultural features....City, State, SHPD doing NOTHING." (email 5.25.16)

"The contractors are totally unaware of any historic or cultural sites they are destroying. Among them historic Ewa Plantation home sites and site of famous WW-II Army unit." (email 5.25.16)

Response:

We respectfully note that there have been more than a dozen assessments, surveys and studies addressing cultural resources (historic properties and sites as defined under HRS Chapter 6E and traditional cultural practices defined under Act 50) in the project area and vicinity over the past 30 years (see Section 3.2 of AIS, Appendix C of DEIS). These reports have been prepared in accordance with HRS Chapter 6E and Act 50; this includes compliance with nationally accepted standards and methods for identifying and evaluating historic resources. As a result of these assessments, surveys, and studies, no historic sites or cultural practices have been identified in the project area. The SHPD has agreed (Chapter 6E-42 review of February 10, 2009 and Chapter 6E-8 review of February 3, 2016) to recommendations of no further cultural resource management work.

Changes planned in FEIS:

No change.

Iwi Kūpuna Monitoring

Comments:

"No Iwi Kupuna monitoring... There are Iwi kupuna burials that are being destroyed." (email 5.25.16)

"Even though no likely remnants today, I have heard several old Ewa Village residents talk about and seeing caves with Iwi in them. Also after heavy rains the Iwi appears in that area. I saw several sinkholes and evidence of bigger underground sinkholes in the back areas towards the Oahu Railway tracks." (email 8.5.16, A)

"Local Ewa Villagers have stated that in plantation times discovering bones in sinkholes was fairly common after heavy rains. There are large numbers of burials in sinkholes especially along karst waterways." (email 1.1.17)

Response:

Thank you for your concern. Fortunately, the area of the WWTP project has been previously subject to multiple cultural studies including archaeological surveys, documentary research, and recordation of oral histories/*mo'olelo* to identify

historic properties, areas with a high probability of archaeological resources, and *wahi pana*. These studies, reviewed and accepted by the State Historic Preservation Division, were consulted in the preparation of the EIS. To date, no *iwi kūpuna* or signs of burial sites have been identified. Any inadvertent discoveries of *iwi kūpuna* will be treated in accordance with State law.

Changes planned in FEIS:

EIS will note that any inadvertent discoveries of *iwi kūpuna* will be treated in accordance with State law.

Possible WWII-period Fence

Comments:

"Plans to knock down historic WW_II fence..." (email 5.26.16)

Response:

The fence in question, a chain-link barrier standing along the north side of Roosevelt Avenue, is of unknown construction date. We are attempting to identify the age of the fence in question with the Navy and will update this letter with any further information. This type of chain-link fence was commonly constructed worldwide throughout the 20th century. It is likely that the fence was constructed by the Navy as part of the development of the Barbers Point Naval Air Station, and therefore occurred after the events of December 7, 1941.

Changes planned in FEIS:

No change.

369th AA Encampment

Comments:

"We have a documented history of the 369th Army AA being at this site. They were a very famous all black (colored - negro) Army unit from Harlem, New York. Highly decorated in WW-I and also a concern of FDR's wife that such units were well treated and had a role in WW-II defense. I have documented histories of Ewa Villagers and their stories about the 369th at Ewa Villages C and Mill camps, which were adjacent to their army camp at this site." (email 5.25.16)

"Report on City Parcel History Related To WW-II 369th AA Regiment. What started out to be a general comment of the draft EIS on the City expansion of the Honouliuli Waste Water Treatment Plant evolved into a larger cultural social history of early Jazz music in Hawaii, the Roosevelt's influence on military deployment of a unique African American unit from New York and the air defense of MCAS Ewa during WW-II. I can tell you this isn't all to the story but I had to get this done by today to make the deadline." (email 6.23.16) Attachment to 6.23.16 email includes information on 369th.

Response:

Thank you for providing this information, which does not appear to have been the focus of published studies or histories. It is interesting as part of local history.

In terms of physical features associated with this unit, field surveys by O'Hare, Shideler and Hammatt (2007) and Yucha et al. (2016) did not identify aboveground remnants of a WWII camp in the project area. Many AA defenses were present throughout Oahu during the World War II period, and many were removed both during and after the war. The information provided indicates that the activities that seem to have taken place within the project area occurred after the events of December 7, 1941, to provide improved air defense after the war started. These activities seem to have been temporary and/or mobile, the sites were probably cleaned up after the war, and subsequent agriculture and other activities have sufficiently changed the ground to now prevent the confirmation of former military activities within the site, or to leave anything visible that could be preserved for the future. The documentation provided will be retained on file.

Changes planned in FEIS:

No change.

Ewa Field Revetments

Comments:

"There is a BIG Pearl Harbor to Midway Battle story never told about why the 75 Ewa dome revetments were built and it takes place between December 8 at Ewa Field and June 4 at the Battle of Midway in 1942. A \$63,000 NPS Battlefield Grant will help identify the still existing early 1942 revetments where Navy and Marine planes left directly for the Island of Midway. In addition, actual surviving

Midway planes have been tracked back to NAS Miami.
<http://ewabattlefield.blogspot.com/>

"The Battle of Midway can be clearly seen as the US response to the attack on Pearl Harbor and no place on Oahu can this history be more clearly seen than at Ewa Field - MCAS Ewa. Nearly all of the Marine and many of the Navy carrier wing planes were at Ewa Field in these early 42 revetments. Midway is considered by many Navy historians as the most important battle in US Navy history- and these Midway battle formation revetment sites still exist at former MCAS Ewa.

"Revetments were built in early 1942 all over Ewa Field, including the very first dome prototype. Several other geometric variations were also used. There were a large number constructed, likely for up to three carrier wings of Navy and Marine planes because NAS Barbers Point was not ready. The sand bag and stucco revetments that still survive are of the earliest designs with crushed coral taxiways and asphalt parking pads. They can still be found along with many other artifacts.

"The Japanese carriers and planes lost in what some consider a miracle or incredibly fortunate battle for the US at Midway - as December 7 Pearl Harbor was for the Japanese naval air forces- are all intricately tied into these early revetments and airplanes. Many of the Japanese carriers, planes and pilots lost at Midway were the same ones that attacked Ewa Field and Pearl Harbor!

"No other existing place on Oahu still contains the physical evidence of the first six months of US response to December 7, 1941 than the still existing MCAS Ewa Field sand bag and stucco revetments. These revetments carried through to the final domed revetment designs which ironically were largely no longer needed because the Battle of Midway in June 1942 eliminated the Japanese naval threat to Hawaii and the Pacific Coast." (email 8.4.16)

Response:

This is interesting background information for what we regard as a neighbor to the Honouliuli WWTP. The revetments are outside the current WWTP project area.

Changes planned in FEIS:

No change.

Ewa Plain Historic Trails

Comments:

"The Honouliuli WWTP is where the 1825 Malden map shows the One'ula trail likely going through and following the Kalo'i Gulch to the sea.... The trail likely would have been on the eastern side of the City WWTP property closer to the Kalo'i waterway which was later totally reconstructed after the mill was shut down and turned over to the City.... The 1997 Navy BRAC Tuggles Reports also shows a Cultural Landscape Map of the other part of the trail - the Kualaka'i (runs to Nimitz Beach) section which goes right through where the Ka Makana shopping Center is, where it runs through MCAS Ewa and down Coral Sea Road. We have seen the remnant of the trail in there. Lots of native plants, Wiliwili trees, Ti growing out of sinkholes and also burial caves.

"The 1825 map shows the trail originating out of Honouliuli and then forking approximately where the Ewa Villages Golf Course Club house is today. One fork went south east (Oneula) and one went south west (Kualaka'i).

"I personally believe that when the Ewa Mooring Mast and later Ewa Field was constructed that the civilian engineers of the day for the Navy knew all about this and located the base between the two trails to do what they could to preserve them as traditional rights of way. It also makes total sense from a fishing/gathering perspective of the communities of that time.

"Below is my blog about this (one of many) back in 2014 and I include many of the maps, including Tuggles, showing this. The evidence of the Kualaka'i is still very visible today. I think the Coral Creek Golf Course largely wiped out the Oneula trail remnant. Especially all trail habitation areas around Haseko were totally destroyed. You can use these maps from the blog if you like in any final report." (email 8.5.16, A)

Also provided in email 8.5.16 was a copy of a 2012 City of Honolulu resolution acknowledging that trails were important to the development of Ewa Plain historically.

Response:

Thank you for your comments on historic trail alignments. The areas identified as the vicinities of these trail alignments were addressed in the Tuggle report (1997), as mentioned in the comment; as well as in studies by O'Hare, Shideler

and Hammatt (2007); Souza, Shideler and Hammatt (2007); and Cruz et al. (2011). These studies were consulted in the preparation of the DEIS. Surveys of current conditions indicate that the trails were most likely outside the WWTP project area, and no confirmed remains of the trails are left today.

Changes planned in FEIS:

Will add reference to trails per studies mentioned in response above.

MCAS Ewa HQ Flagpole and Road Alignments

Comments:

"By chance researching the 1825 Malden Hawaiian Trails through Ewa I finally figured out the realignment of Geiger Road and how the Honouliuli WWTP was laid out. In particular if there was any regard to former the historic MCAS Ewa HQ and flagpole.

"Map overlay from final 1948 MCAS base map shows that when the Honouliuli Waste Water Treatment Plant was built and road realigned that the original 1944 MCAS Ewa Wing HQ site was used for the WWTP maintenance HQ and administrative buildings. In particular, the site of the base flagpole was in fact preserved. However there is absolutely no record or mention of any of this anywhere in the WWTP EA documents. It remains a mystery as to who did it this way - but possibly a former military (Navy?) engineer was consulted who knew what was previously there and designed this alignment.

"The Honouliuli wastewater treatment plant was built around 1978. Sometime earlier the former MCAS Ewa buildings were taken down and the roadway realigned. However the later WWTP admin buildings were placed in alignment with the earlier MCAS Ewa buildings and kept the front HQ flagpole area as open space. This is shown with the red circle.

"The red shows the original alignment of Geiger Rd. The blue shows the likely route of the original 1825 Malden Hawaiian trail that went to Oneula Beach. The trail ran north through Ewa Villages and then up to Honouliuli and the shore of West Loch." (email 1.1.17)

Response:

Thank you for providing your observations and opinions on the former road alignments and early development of the WWTP. The area in question has been heavily developed as a WWTP since 1978, as the comments note. This subsequent land use as a WWTP has sufficiently changed the ground to now prevent the confirmation of the former military activities within the site, and there is no apparent visible evidence of the former activities that could be preserved for the future.

Changes planned in FEIS:

No change.

Avian Resources

Comments:

"Note that the endangered Hawaiian Pueo as well as the Barn owl are found throughout this area near Kalo'i Gulch. It also attracts migratory water birds of many kinds. Open ground nesting space and water features should be preserved in this area to provide bird species habitat corridors from the mountains to the sea." (email 1.1.17)

Response:

Thank you for your concerns regarding avian species habitat. This issue is addressed in Section 5.5.2 of the DEIS, where it is noted that *pueo* have not been observed on the site, although the bird species is found in types of habitat that are present on the property. Mitigation measures have been proposed, as described in the DEIS, including suspending work with heavy machinery or vehicular traffic within 300 feet of any area where indications of nesting are observed until young birds have the opportunity to fledge. Barn owls are an introduced species that are non-native and considered invasive according to the U.S. Fish and Wildlife Service.

Changes planned in FEIS:


No change.

Mr. John Bond
March 23, 2017
Page 10

In addition to the responses in this letter, we can arrange for our cultural resources consultant, David Shideler of Cultural Surveys Hawai'i, to meet with you regarding any observed physical evidence on the project site that is not captured in our documents.

We appreciate your time and effort in reviewing the DEIS. Your comments, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,



Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM



OFFICE OF ENVIRONMENTAL QUALITY CONTROL

DEPARTMENT OF HEALTH | 235 South Beretania Street, Suite 702, Honolulu, HI 96813 | oeqchawaii@doh.hawaii.gov

DAVID Y. IGE
GOVERNOR

SCOTT GLENN
DIRECTOR

(808) 586-4185

June 17, 2016

2016 JUN 24 P 8:57

WASTEWATER TREATMENT
& DISPOSAL DIVISION
OFFICE SERVICES

Ms. Lori M. K. Kahikina, P.E., Director
City and County of Honolulu
Department of Environmental Services
1000 Ulu'ōhi'a Street, Suite 380
Kapolei, HI 96707

Dear Ms. Kaihikina:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Project, at TMK 91013007 and 91069003 in the judicial district of 'Ewa

The Office of Environmental Quality Control (OEQC) has reviewed the subject document and responds as follows.

1. Planning for Climate Change and Future Natural Hazards: Section 5.1 of the DEIS discusses the current environmental setting for climate. Section 5.4 of the DEIS discusses the current natural hazards. Please discuss what specific design measures for full site buildout in 2050 that your agency may have to undertake to accommodate future meteorological events related to climate change and natural hazards such as extreme rainfall and flooding impacts on engineering design (i.e., creating structures with increased structural integrity to withstand such rainfall and flooding events, or alternatively, relocating structures to a higher elevation to accommodate sea-level rise).
2. Cultural Resources and Practices: While the DEIS includes a discussion of the Section 6-E, HRS requirements related to archaeology and historic preservation, there appears to be no information on cultural resources and contemporary cultural practices. Please refer to guidance on cultural assessment contained in our 2012 Guidance document and discuss any cultural resources and cultural practices that may be impacted by the proposed action.

Please contact Mr. Leslie Segundo, Environmental Health Specialist if you have further questions. Thank you for the opportunity to comment.

Sincerely,

Scott Glenn
Director

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-045

March 23, 2017

Scott Glenn, Director
Office of Environmental Quality Control
Department of Health
235 South Beretania, Suite 702
Honolulu, HI 96813

Dear Mr. Glenn:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter to the City and County of Honolulu dated June 17, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to your comments in your letter:

1. **Planning for Climate Change and Future Natural Hazards:** Section 5.1 of the DEIS discusses the current environmental setting for climate. Section 5.4 of the DEIS discusses the current natural hazards. Please discuss what specific design measures for full site buildout in 2050 that your agency may have to undertake to accommodate future meteorological events related to climate change and natural hazards such as extreme rainfall and flooding impacts on engineering design (i.e., creating structures with increased structural integrity to withstand such rainfall and flooding events, or alternatively, relocating structures to a higher elevation to accommodate sea level rise).

Response: Acknowledged, the text of Section 5.4 has been changed to include additional discussion on climate change. The Department of Environmental Services intends to work with other State and County agencies in the future as the guidance and policies to address climate change are further developed. We anticipate that as additional data is collected over the next 10 to 20 years, trends and future projections are refined, and new

standards and codes are developed, the planning for the next phase at the WWTP site will be adjusted accordingly for the site buildout by 2050.

We are aware that the risks of climate change include changes in rainfall intensity, sea level rise, groundwater levels and impacts from storm hazards, and there is a need to address resilience in recovering from any impacts. We note that projected trends in meteorological events currently show a range of projections, but a convergence of the projections is expected as more data is obtained and the models are refined.

Regarding the sea level rise issue, we note that the Honouliuli WWTP site varies from 25 to 40 ft above sea level, and is well above the projected sea level change for Honolulu which ranges from a low of 0.3 ft to a high of 1.5 ft. through the year 2050, as calculated utilizing the Army Corps of Engineers' Sea-Level Rise Calculator.

Resiliency in withstanding flood events will be appropriately addressed during the design phase in accordance with the standards that are in effect. New flood standards that will be developed in the future to address climate changes will affect the planning and design of future improvement projects for the site buildout by 2050.

2. Cultural Resources and Practices: While the DEIS includes a discussion of the Section 6-E, HRS requirements related to archeology and historic preservation, there appears to be no information on cultural resources and contemporary cultural practices. Please refer to guidance on cultural assessment contained in our 2012 Guidance document and discuss any cultural resources and cultural practices that may be impacted by the proposed action.

Response: Acknowledged. The FEIS now includes a previously prepared Cultural Impact Assessment (Cruz et al. 2011) which is referenced in Section 5.6 and included in Appendix C.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,



Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

WATER SUPPLY

F HONOLULU
A STREET



July 19, 2016

KIRK CALDWELL, MAYOR

DUANE R. MIYASHIRO, Chair
ADAM C. WONG, Vice Chair
DAVID C. HULIHEE
KAPUA SPROAT
BRYAN P. ANDAYA

ROSS S. SASAMURA, Ex-Officio
FORD N. FUCHIGAMI, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer *WJ*

Mr. Matthew Stimpson
AECOM
1001 Bishop Street
Honolulu, Hawaii 96813



Dear Mr. Stimpson:

Subject: Your Letter Dated May 8, 2016 Requesting Comments on
the Draft Environmental Impact Statement for the Honouliuli
Treatment Plant Secondary Treatment and Support Facilities
Project – Tax Map Keys: 9-1-013: 007, 9-1-069: 003

Thank you for your letter requesting comments on the Honouliuli Treatment Plant Secondary Treatment and Support Facilities Project Draft Environmental Impact Statement (DEIS). We have the following comments:

1. The DEIS needs to provide an estimated potable and R-1 recycled water demand for the expansion of the secondary wastewater treatment facilities, landscape irrigation and domestic water use. In addition, an inventory of the existing and proposed water fixtures counts is required so that the water meters can be adequately sized.
2. The existing potable water system does not have sufficient redundancy to provide reliable water service and fire protection for the expansion of this critical facility. Therefore, a 16" pipeline should be extended from Geiger Road and Roosevelt Road through Malio Street to the Renton Road and Kapolei Parkway intersection to create a pipeline loop system. In addition, depending on the anticipated R-1 recycled water demand, additional R-1 pipeline and/or pump improvements may be necessary.
3. Because the Wastewater Treatment Plant (WWTP) is a large water user, the on-site potable and R-1 water systems should be designed to minimize large pressure surges that could result in a water main break. The Sand Island WWTP has been documented as causing large pressure surges in the potable water system.

Mr. Matthew Stimpson

July 19, 2016

Page 2

4. Please be advised that this information is based upon current data, and therefore, the Board of Water Supply (BWS) reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval. When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.
5. Water conservation measures are required for the proposed facility expansion. R-1 recycled water should be fully utilized. For your information, on June 30, 2016, the Governor signed House Bill 1749 into law requiring the utilization of reclaimed water for uses other than drinking and for potable water needs in 100 percent of state and county facilities by December 31, 2045.
6. The facility is required to meet BWS cross-connection control requirements.
7. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Ernest Y. W. Lau', is positioned above the printed name.

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-026

March 23, 2017

MEMORANDUM

TO: Ernest Y.W. Lau, P.E., Manager and Chief Engineer
Board of Water Supply

FROM: Lori M. K. Kahikina, P.E.
Director

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated July 19, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. The DEIS needs to provide an estimated potable and R-1 recycled water demand for the expansion of the secondary wastewater treatment facilities, landscape irrigation and domestic water use. In addition, an inventory of the existing and proposed water fixtures counts is required so that the water meters can be adequately sized.

Response: Acknowledged and added a note to include an estimation of potable demands during the design phase.

2. The existing potable water system does not have sufficient redundancy to provide reliable water service and fire protection for the expansion of this critical facility. Therefore, a 16" pipeline should be extended from Geiger Road and Roosevelt Road through Malio Street to the Renton Road and Kapolei Parkway intersection to create a pipeline loop system. In addition, depending on the anticipated R-1 recycled water demand, additional R-1 pipeline and/or pump improvements may be necessary.

Response: Acknowledged and noted in section 5.13.1.

3. Because the Wastewater Treatment Plant (WWTP) is a large water user, the onsite potable and R-1 water systems should be designed to minimize large pressure surges that could result in a water main break. The Sand Island WWTP has been documented as causing large pressure surges in the potable water system.

Response: Acknowledged and will be appropriately analyzed during the design phase of the project.

4. Please be advised that this information is based upon current data, and therefore, the Board of Water Supply (BWS) reserves the right to change any position or information stated herein up until the Final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval. When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

Response: Acknowledged.

5. Water conservation measures are required for the proposed facility expansion. R-1 recycled water should be fully utilized. For your information, on June 30, 2016, the Governor signed House Bill 1749 into law requiring the utilization of reclaimed water for uses other than drinking and for potable water needs in 100 percent of state and county facilities by December 31, 2045.

Response: Acknowledged and discussed in Section 5.13.1.

6. The facility is required to meet BWS cross-connection control requirements.

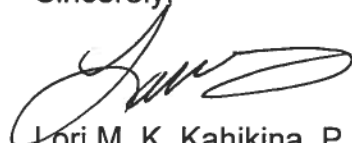
Response: Acknowledged and discussed in Section 5.13.1.

7. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

Response: Acknowledged and discussed in Section 5.13.1. We have reviewed your memorandum dated August 22, 2016. We have no comments or objections to the subject request.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', written in a cursive style.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DAVID Y. IGE
GOVERNOR



DOUGLAS MURDOCK
COMPTROLLER

AUDREY HIDANO
Deputy Comptroller

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

MAY 20 2016

(P)1144.6

Ms. Marisol Olaes
City and County of Honolulu
Department of Environmental Services
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707

Dear Ms. Olaes:

Subject: Draft Environmental Impact Statement for the
Honouliuli Wastewater Treatment Plan Facilities Plan
Secondary Treatment and Support Facilities
Ewa Beach, Oahu, Hawaii
TMK: (1) 9-1-013: 007 and (1) 9-1-069: 003

16 MAY 25 P 3:13

DEPARTMENT OF
ENVIRONMENTAL SERVICES

Thank you for the opportunity to comment on the subject project. We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.

If you have any questions, your staff may call Ms. Gayle Takasaki of the Public Works Division at 586-0584.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim K. Kurata".

JAMES K. KURATA
Public Works Administrator

GT:lnn

c: Mr. Matthew Stimpson, AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-033

March 23, 2017

Mr. James Kurata, Public Works Administrator
State of Hawaii
Department of Accounting and General Services
PO Box 119
Honolulu, Hawaii 96810-0119

Dear Mr. Kurata:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated May 20, 2016, reference no. (P)1144.6, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS), indicating that you have no comments to offer regarding the subject Draft EIS.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori M. K. Kahikina", is written over a horizontal line.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

June 20, 2016

City and County of Honolulu
Department of Environmental Services
Attention: Ms. Marisol Olaes
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707

via email: Molaes@honolulu.gov

AECOM
Attention: Mr. Matthew Stimpson
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813-3698

via email: Matthew.Stimpson@aecom.com

Dear Ms. Olaes and Mr. Stimpson:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the Honouliuli Wastewater Treatment Plant Facilities Plan

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division, (b) Office of Conservation & Coastal Lands, and (c) Land Division – Oahu District on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 13, 2016

MEMORANDUM

TO: *TR*
DLNR Agencies:

- ☐ Div. of Aquatic Resources
- ☐ Div. of Boating & Ocean Recreation
- ☒ **Engineering Division**
- ☐ Div. of Forestry & Wildlife
- ☐ Div. of State Parks
- ☒ Commission on Water Resource Management
- ☐ Office of Conservation & Coastal Lands
- ☒ Land Division – Oahu District
- ☒ Historic Preservation

FROM: *TD*
SUBJECT:

Russell Y. Tsuji, Land Administrator
Draft Environmental Impact Statement (DEIS) for the Honouliuli Wastewater Treatment Plant Facilities Plan

LOCATION: Ewa Beach; Island of Oahu; TMK No. (1) 9-1-013:007 & 9-1-069:003

APPLICANT: City and County of Honolulu, Department of Environmental Services

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **June 20, 2016**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on the Current Environmental Notice under Quick Links on the right.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- () We have no objections.
- () We have no comments.
- (☒) Comments are attached.

Signed: *[Signature]*

Print Name:

Carty S. Chang, Chief Engineer

Date:

9/2/16

cc: Central Files

16 MAY 13 AM 10:44 RECEIVED
LAND DIVISION
2016 JUN -3 AM 10:53
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

To: Land Division

**Ref: Draft EIS for the Honouliuli Wastewater Treatment Plant Facilities Plan, Oahu,
Hawaii**

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a designated Flood Hazard.

The owner or the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zone designations can be found using the Flood Insurance Rate Map (FIRM), which can be accessed through the Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

National Flood Insurance Program establishes the rules and regulations of the NFIP - Title 44 of the Code of Federal Regulations (44CFR). The NFIP Zone X is a designation where there is no perceived flood impact. Therefore, the NFIP does not regulate any development within a Zone X designation.

Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may take precedence over the NFIP standards as local designations prove to be more restrictive. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- Kauai: County of Kauai, Department of Public Works (808) 241-4846.

Signed: 
CARTY S. CHANG, CHIEF ENGINEER

Date: 4/2/16

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 13, 2016

MEMORANDUM

TO:

DLNR Agencies:

- ☐ Div. of Aquatic Resources
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division
- ☐ Div. of Forestry & Wildlife
- ☐ Div. of State Parks
- ☒ Commission on Water Resource Management
- ☐ Office of Conservation & Coastal Lands
- ☒ Land Division – Oahu District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Impact Statement (DEIS) for the Honouliuli Wastewater Treatment Plant Facilities Plan

LOCATION:

Ewa Beach; Island of Oahu; TMK No. (1) 9-1-013:007 & 9-1-069:003

APPLICANT:

City and County of Honolulu, Department of Environmental Services

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **June 20, 2016**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on the Current Environmental Notice under Quick Links on the right.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- (☒) We have no objections.
- (☒) We have no comments.
- (☐) Comments are attached.

Signed:

T. Chee

Print Name:

Terry Chee

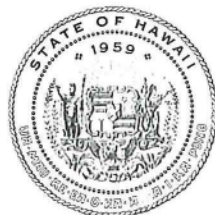
Date:

5/18/16

cc: Central Files

RECEIVED
LAND DIVISION
2016 MAY 19 AM 8:39
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

DAVID Y. IGE
GOVERNOR OF HAWAII



RECEIVED
LAND DIVISION

2016 JUN -6 AM 11:09

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
OFFICE OF CONSERVATION AND COASTAL LANDS
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
KEKOA KALUHIWA
FIRST DEPUTY
JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Ref: OCCL:LY

CORR: OA 16-217

City and County of Honolulu
Department of Environmental Services
1000 Uluohia Street, Suite 308
Kapolei, HI 96707
Attn: Marisol Olaes

JUN - 3 2016

SUBJECT: Request for Comments
Draft Environmental Impact Statement (EIS) for the Honouliuli Wastewater
Treatment Plan Facilities Plan, Honouliuli Wastewater Treatment Plan Secondary
Treatment and Support Facilities, O'ahu, Hawaii
Tax Map Key: (1) 9-1-013:007 and 9-1-069:003

Dear Marisol Olaes:

The Office of Conservation and Coastal Lands (OCCL) is in receipt of your request for comments on the subject Draft EIS. Based on the information provided in the Draft EIS, the OCCL notes that the project area appears to lie outside of the Conservation District and is, therefore, not in our jurisdiction.

Should you have any questions regarding this correspondence, please contact Lauren Yasaka of our Office at (808) 587-0386.

Sincerely,

for Samuel J. Lemmo
Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

c: ODLO
C&C DPP
AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR DESIGNATE

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO:
PRO 17-034

March 23, 2017

Mr. Russell Tsuji, Land Administrator
State of Hawaii, Department of Land and Natural Resources
Land Division
PO Box 621
Honolulu, Hawaii 96809

Dear Mr. Tsuji:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii
Engineering Division Comments

Thank you for your letter dated June 20, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the Engineering Division's comments in your letter:

1. The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a designated Flood Hazard.

Response: We acknowledge the project will be in accordance with federal, state and city rules and regulations.

2. The owner or the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project.

Flood Hazard Zone designations can be found using the Flood Insurance Rate Map (FIRM), which can be accessed through the Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

Response: Acknowledged, the FHAT tool was reviewed and appropriate Flood Hazard Zone designation obtained.

3. National Flood Insurance Program establishes the rules and regulations of the NFIP -Title 44 of the Code of Federal Regulations (44CFR). The NFIP Zone X is a designation where there is no perceived flood impact. Therefore, the NFIP does not regulate any development within a Zone X designation.

Response: Acknowledged, reviewed the rules and regulations, and any flood insurance needs will be appropriately addressed during the design phase of the project.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', with a stylized flourish at the end.

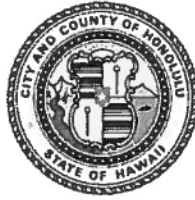
Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-036

March 23, 2017

Mr. Russell Tsuji, Land Administrator
State of Hawaii, Department of Land and Natural Resources
Land Division
PO Box 621
Honolulu, Hawaii 96809

Dear Mr. Tsuji:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii
Land Division – Oahu District Comments

Thank you for your letter dated June 20, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS), indicating that your Land Division has no comments on the DEIS.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori", is written over a horizontal line.

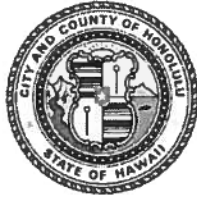
Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-035

March 23, 2017

Mr. Samuel Lemmo, Administrator
State of Hawaii
Department of Land and Natural Resources
Office of Conservation and Coastal Lands
PO Box 621
Honolulu, Hawaii 96809

Dear Mr. Lemmo:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated June 3, 2016, reference no. OA 16-217, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS), indicating that the project area appears to lie outside of the Conservation District and is, therefore, not in your office's jurisdiction. We acknowledge that your office has no comments.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori M. K. Kahikina", is written over a horizontal line.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DAVID Y. IGE
GOVERNOR



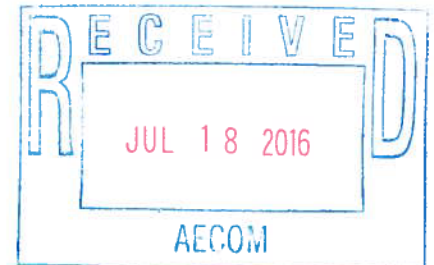
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

FORD N. FUCHIGAMI
DIRECTOR

Deputy Directors
JADE T. BUTAY
ROSS M. HIGASHI
EDWIN H. SNIFFEN
DARRELL T. YOUNG

IN REPLY REFER TO:
STP 8.1988

July 7, 2016



Ms. Marisol Olaes
City and County of Honolulu
Department of Environmental Services
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707

Dear Ms. Olaes:

Subject: Honouliuli Wastewater Treatment Plant
Secondary Treatment and Support Facilities Plan
Draft Environmental Impact Statement (DEIS)
Ewa, Oahu, Hawaii
TMK: (1) 9-1-013:007 and (1) 9-1-069:003

It is anticipated that this project will not impact our State highway facilities after completion of the construction work. However, during construction there may be impacts to the State Highways. To this end, coordination and best practices shall be used to minimize traffic impacts and inconveniences to the uses of the State highway during construction.

If there are any questions, please contact Mr. Norren Kato of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

Sincerely,

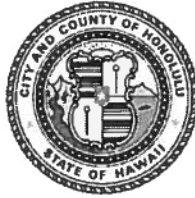
A handwritten signature in black ink, appearing to read "F. N. Fuchigami".
FORD N. FUCHIGAMI
Director of Transportation

c: ✓ Matthew Stimpson, AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-039

March 23, 2017

Mr. Ford N. Fuchigami, Director
State of Hawaii
Department of Transportation
869 Punchbowl St.
Honolulu, Hawaii 96813-5097

Dear Mr. Fuchigami:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated July 7, 2016, reference no. STP 8.1988, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. It is anticipated that this project will not impact our State highway facilities after completion of the construction work. However, during construction there may be impacts to the State Highways. To this end, coordination and best practices shall be used to minimize traffic impacts and inconveniences to the uses of the State highway during construction.

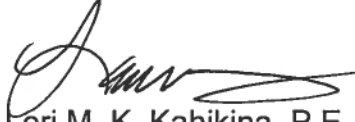
Response: We acknowledge the traffic impacts, and mitigation measures will be followed to minimize the impacts on the local residents and the State Highways.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with

Mr. Ford N. Fuchigami
March 23, 2017
Page 2

this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', with a stylized flourish extending to the right.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DAVID Y. IGE
GOVERNOR



RACHAEL WONG, DrPH
DIRECTOR

PANKAJ BHANOT
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
Benefit, Employment & Support Services Division
820 Millilani Street, Suite 606
Honolulu, Hawaii 96813

May 26, 2016

Re: 16-0264

City and County of Honolulu
Department of Environmental Services
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707
Attn: Marisol Olaes

Dear Ms. Olaes:

Subject: Draft Environmental Impact Statement (DEIS) for the Honouliuli Wastewater Treatment Plan Facilities Plan, Honouliuli Wastewater Treatment Plan Secondary Treatment and Support Facilities, Oahu, Hawaii

This is in response to your letter dated May 8, 2016 requesting the Department of Human Services (DHS) review and comment on the above-named project.

As cited in your DEIS on page 5-55, there are no child care facilities within a 1 mile radius however there are several within a 2 miles as well as several DHS registered family child care homes within several miles of the treatment plant.

If you have any questions or need further information, please contact Ms. Jill Arizumi, Child Care Program Specialist, at (808) 586-5240.

Sincerely,

A handwritten signature in blue ink, which appears to read "Scott Nakasone".

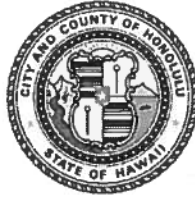
Scott Nakasone
Assistant Division Administrator

c: AECOM, Matthew Stimpson
Rachael Wong, DrPH, Director

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-040

March 23, 2017

Mr. Scott Nakasone, Assistant Division Administrator
State of Hawaii, Department of Human Resources
Benefit, Employment & Support Services Division
820 Mililani Street, Suite 606
Honolulu, Hawaii 96813

Dear Mr. Nakasone:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated May 26, 2016, reference no.16-0264, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. As cited in your DEIS on page 5-55, there are no child care facilities within a 1 mile radius however there are several within 2 miles as well as several DHS registered family child care homes within several miles of the treatment plant.

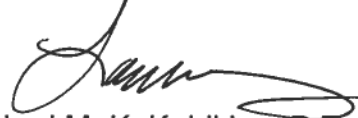
Response: We acknowledge the comment and have noted it in the text.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with

Mr. Scott Nakasone
March 23, 2017
Page 2

this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

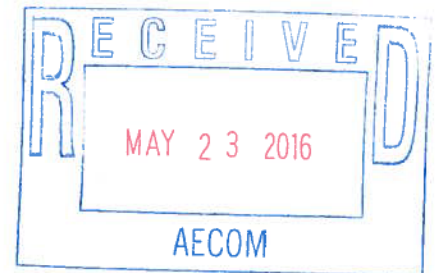
A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', with a stylized flourish at the end.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DEPARTMENT OF PARKS & RECREATION
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 309, Kapolei, Hawaii 96707
Phone: (808) 768-3003 • Fax: (808) 768-3053
Website: www.honolulu.gov



KIRK CALDWELL
MAYOR



MICHELE K. NEKOTA
DIRECTOR

JEANNE C. ISHIKAWA
DEPUTY DIRECTOR

May 13, 2016

Anne Symonds, P.E.
Water/Wastewater Manager
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Ms. Symonds:

SUBJECT: Draft Environmental Impact Statement for the Honouliuli Wastewater
Treatment Plan Facilities Plan, Honouliuli Wastewater Treatment
Plan Secondary Treatment and Support Facilities, Oahu, Hawaii

Thank you for the opportunity to review and comment on the subject Draft Environment
Impact Statement for the Honouliuli Wastewater Treatment Plan Facilities Plan, Honouliuli,
Wastewater Treatment Plan Secondary Treatment and Support Facilities.

The Department of Parks and Recreation has no comment as the proposed project will
have no impact on any of our programs and facilities. You may remove us as a consulted party
for the balance of the EIS process.

Should you have any questions, please contact Mr. John Reid, Planner at
768-3017.

Sincerely,

Michele K. Nekota
Director

MKN:jr
(652608)

cc: Marisol Olaes, Department of Environmental Services
Matthew Stimpson, AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-028

March 23, 2017

MEMORANDUM

TO: Michele K. Nekota, Director
Department of Parks and Recreation

FROM: Lori M. K. Kahikina, P.E.
Director

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter to AECOM dated May 13, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS), indicating that your office has no comments on the DEIS.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

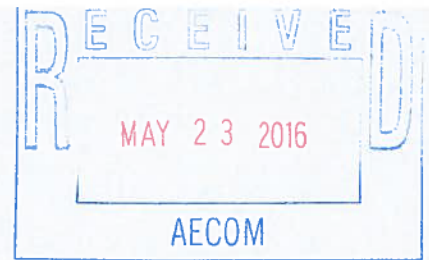
A handwritten signature in black ink, appearing to read "Lori M. K. Kahikina", is written over a horizontal line.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulu.org



KIRK CALDWELL
MAYOR



LOUIS M. KEALOHA
CHIEF

MARIE A. MCCAULEY
CARY OKIMOTO
DEPUTY CHIEFS

OUR REFERENCE MT-DK

May 16, 2016

MEMORANDUM

TO: Lori M. K. Kahikina, P.E., Director
Department of Environmental Services

ATTENTION: Marisol Olaes, Civil Engineer III

FROM: Louis M. Kealoha, Chief of Police

SUBJECT: Draft Environmental Impact Statement for the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities, Oahu, Hawaii

This is in response to a letter from the AECOM Technical Services, Inc. (AECOM), dated May 8, 2016, regarding the subject above.

Based on the information provided, this project should have no significant impact on the services or operations of the Honolulu Police Department.

If there are any questions, please call Major Kurt Kendro of District 8 (Kapolei) at 723-8403.

Thank you for the opportunity to review the subject application.

Louis M. Kealoha
Chief of Police

By

A handwritten signature in black ink, appearing to read "Mark Tsuyemura".

Mark Tsuyemura
Management Analyst VI
Office of the Chief

cc: ✓ Mr. Matthew Stimpson, AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-031

March 23, 2017

MEMORANDUM

TO: Cary Okimoto, Acting Chief
Honolulu Police Department

FROM: Lori M. K. Kahikina, P.E.
Director

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated May 16, 2016, reference no. MT-DK, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS), indicating that the subject project should have no significant impact on the services or operations of the Honolulu Police Department. We acknowledge that your Department has no comments.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori M. K. Kahikina", is written over a circular stamp that is partially visible behind it.

Lori M. K. Kahikina, P.E.
Director

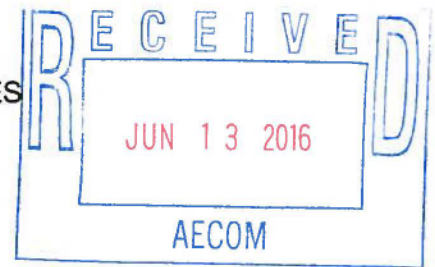
cc: Matthew Stimpson, AECOM

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, THIRD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov



KIRK CALDWELL
MAYOR



MICHAEL D. FORMBY
DIRECTOR

MARK N. GARRITY, AICP
DEPUTY DIRECTOR

TP5/16-653242R

June 13, 2016

Mr. Matthew Stimpson
AECOM Technical Services, Inc.
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Stimpson:

SUBJECT: Draft Environmental Impact Statement, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities, Ewa Beach, Oahu, Hawaii

In response to your letter dated May 8, 2016, we have the following comments:

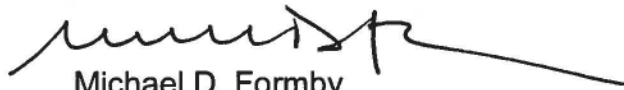
1. Future operational needs at this facility should be addressed in order to mitigate any traffic conflicts at the proposed driveway alignments. The design should ensure that adequate sight distance is provided for all vehicle types at all project driveways.
2. The report fails to address the poor level of service conditions for traffic exiting the site from the Geiger Road driveways. Considering the industrial use of the site, it is likely that a higher percentage of large vehicles will be present, increasing driveway delays.
3. All driveways that are gated for security purposes should have adequate storage for vehicle queuing and a turnaround area.
4. The proposed multi-use pathway around the perimeter of the project site should be designed to include provisions for safe pedestrian, bicycle and vehicle crossings at all project driveways.
5. All parking needs for the proposed facility (employees and visitors) should be handled on-site and located in areas that are convenient and safe for the users.

Mr. Matthew Stimpson
June 13, 2016
Page 2

6. Any damage to the existing roadway and sidewalk area caused by the project should be restored to its original or better condition.
7. The area Neighborhood Board, as well as the area residents, businesses, emergency personnel (fire, ambulance and police), Oahu Transit Services, Inc. (TheBus), etc., should continue to be kept apprised of the details of the proposed project and the impacts that the project may have on the adjoining local street area network.
8. Construction materials and equipment should be transferred to and from the project site during off-peak traffic hours (8:30 a.m. to 3:30 p.m.) to minimize any possible disruption to traffic on the local streets.

Thank you for the opportunity to review this matter. Should you have any questions, please contact Renee Yamasaki of my staff at 768-8383.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Michael D. Formby', with a long horizontal line extending to the right.

Michael D. Formby
Director

cc: Ms. Marisol Olaes, Department of Environmental Services

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-029

March 23, 2017

MEMORANDUM

TO: Wes Frysztacki, Director
Department of Transportation Services

FROM: Lori M. K. Kahikina, P.E.
Director

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter to AECOM dated June 13, 2016, reference no. TP5/16-653242R, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. Future operational needs at this facility should be addressed in order to mitigate any traffic conflicts at the proposed driveway alignments. The design should ensure that adequate sight distance is provided for all vehicle types at all project driveways.

Response: We acknowledge your comment, which will be addressed appropriately during the design phase of this project.

2. The report fails to address the poor level of service conditions for traffic exiting the site from the Geiger Road driveways. Considering the industrial

use of the site, it is likely that a higher percentage of large vehicles will be present, increasing driveway delays.

Response: We acknowledge your comment, which will be addressed appropriately during the design phase of this project.

3. All driveways that are gated for security purposes should have adequate storage for vehicle queuing and a turnaround area.

Response: We acknowledge your comment, which will be addressed appropriately during the design phase of this project.

4. The proposed multi-use pathway around the perimeter of the project site should be designed to include provisions for safe pedestrian, bicycle and vehicle crossings at all project driveways.

Response: We acknowledge your comment, which will be addressed during the design phase of the future project which will implement the multi-use pathway.

5. All parking needs for the proposed facility (employees and visitors) should be handled on-site and located in areas that are convenient and safe for the users.

Response: We acknowledge your comment, which will be addressed appropriately during the design phase of this project.

6. Any damage to the existing roadway and sidewalk area caused by the project should be restored to its original or better condition.

Response: We acknowledge your comment, which will be addressed appropriately during the design phase of this project in accordance with City ordinances.

7. The area Neighborhood Board, as well as the area residents, businesses, emergency personnel (fire, ambulance and police), Oahu Transit Services, Inc. (TheBus), etc., should continue to be kept apprised of the details of the proposed project and the impacts that the project may have on the adjoining local street area network.

Response: Addressed in the document. Organizations/departments shall be informed as the project progresses.

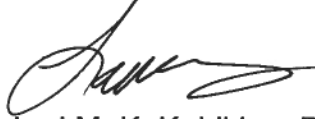
Mr. Wes Frysztacki
March 23, 2017
Page 3

8. Construction materials and equipment should be transferred to and from the project site during off-peak traffic hours (8:30a.m. to 3:30 p.m.) to minimize any possible disruption to traffic on the local streets.

Response: Addressed in the document, and we acknowledge the need for minimizing construction vehicle traffic during peak hours.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

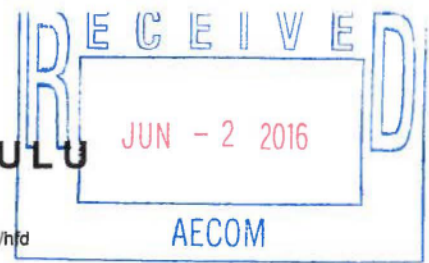
A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', written in a cursive style.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd



KIRK CALDWELL
MAYOR



MANUEL P. NEVES
FIRE CHIEF

LIONEL CAMARA JR.
DEPUTY FIRE CHIEF

May 26, 2016

TO: LORI KAHIKINA, P.E. DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

ATTN: MARISOL OLAES, CIVIL ENGINEER

FROM: SOCRATES D. BRATAKOS, ASSISTANT CHIEF

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
HONOULIULI WASTEWATER TREATMENT PLAN FACILITIES PLAN,
HONOULIULI WASTEWATER TREATMENT PLAN SECONDARY
TREATMENT AND SUPPORT FACILITIES

In response to a letter from Ms. Anne Symonds of AECOM Technical Services, Inc., dated May 8, 2016, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) requires that the following be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet (46 m) from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; Uniform Fire Code [UFC]TM, 2012 Edition, Section 18.2.3.2.2.)

A fire department access road shall extend to within 50 feet (15 m) of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; UFCTM, 2012 Edition, Section 18.2.3.2.1.)

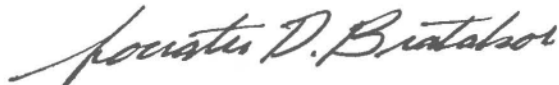
2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter

Lori Kahikina, P.E. Director
Page 2
May 26, 2016

constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1; UFC™, 2012 Edition, Section 18.3.1, as amended.)

3. Submit civil drawings to the HFD for review and approval.

Should you have questions, please contact Battalion Chief Terry Seelig of our Fire Prevention Bureau at 723-7151 or tseelig@honolulu.gov.


SOCRATES D. BRATAKOS
Assistant Chief

SDB/SY:bh

cc: Matthew Stimpson, AECOM

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-030

March 23, 2017

MEMORANDUM

TO: Manuel P. Neves, Chief
Honolulu Fire Department

FROM: Lori M. K. Kahikina, P.E.
Director

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated May 26, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet (46 m) from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA]1; Uniform Fire Code [UFC]™, 2012 Edition, Section 18.2.3.2.2.) A fire department access road shall extend to within 50 feet (15m) of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; UFC™, 2012 Edition, Section 18.2.3.2.1.)

Response: Text added in the document

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1; UFC™, 2012 Edition, Section 18.3.1, as amended.)

Response: Text was added and the reference updated in the document.

3. Submit civil drawings to the HFD for review and approval

Response: We acknowledge drawing sheets will be distributed for review and approval by your office.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,



Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM



OFFICE OF PLANNING STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov/>

DAVID Y. IGE
GOVERNOR

LEO R. ASUNCION
DIRECTOR
OFFICE OF PLANNING

Ref. No. P-15199

June 15, 2016

Ms. Lori M. K. Kahikina, P.E.
Director
Department of Environmental Services
City and County of Honolulu
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707



Dear Ms. Kahikina:

Subject: Draft Environmental Impact Statement for the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plan Secondary Treatment and Support Facilities, Oahu, Hawaii;
TMK: (1) 9-3-013:007 and (1) 9-1-069:004; Expansion Area, (1) 9-1-069:003

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Honouliuli Wastewater Treatment Plant (WWTP) Facilities Plan, Ewa, Oahu. The DEIS was transmitted to our office via letter dated May 8, 2016.

It is our understanding that this project proposes to upgrade and expand the existing Honouliuli WWTP facility to provide secondary treatment of wastewater. The expansion of the WWTP is being considered due to the projected increase of wastewater flows, and to accommodate the population growth within the Ewa District.

The DEIS examined three WWTP secondary treatment upgrade options and a "no action" alternative. The expansion plans for the Honouliuli WWTP call for improvements to the central laboratory, ocean team facilities, administration building, operations building, maintenance areas, central shops, warehouses, truck wash area, supervisory control and data acquisition operations, septage receiving station, odor control system, and water recycling facility.

The Office of Planning (OP) has reviewed the transmitted material and has the following comments to offer:

1. The DEIS examines many of the plans, programs and policies that fall under the jurisdiction of OP.
2. Section 4.1.9 Stormwater Quantity and Quality Control, pages 4-6 and 4-7 of the DEIS states that the Honouliuli WWTP drainage design will incorporate best management practices and Low Impact Development (LID) principles to minimize

the volume and improve the quality of stormwater runoff from the facility and to comply with National Pollution Discharge Elimination System permit requirements and county drainage standards.

Furthermore, stormwater management retention/infiltration basins will be used throughout the WWTP site. These practices are consistent with LID features.

3. Section 5.3.2.2, Construction Impacts and Mitigation Measures, pages 5-7 to 5-8 of the DEIS examines erosion and sedimentation measures that will be employed during construction activities. It concludes that nearby off-site surface waters should not be impacted as a result of stormwater during construction activities.
4. The DEIS examines the Hawaii State Plan in Section 7.1.1, pages 7-1 to 7-2 address the project's consistency with several of the goals and objectives of Hawaii Revised Statutes (HRS) Chapter 226. The DEIS lists the following Hawaii State Plan themes:
 - HRS § 226-14 Objective and policies for facility systems; in general, (a), (b)(1), (2), (3), (4)
 - HRS § 226-15 Objectives and policies for facility systems; solid and liquid wastes, (a)(1)(2), (b)(1)(3)

The DEIS also lists the project's compatibility with two of the State Functional Plans, including:

- 1) The Recreation State Functional Plan, Section 7.1.2.1, page 7-2
 - Issue Area IV. Resource Conservation and Management
 - Objective IV-B: Prevent Degradation of the Marine Environment
 - Policy IV-B(1): Enhance water quality to provide high-quality ocean recreation opportunities.
 - Implementing Action IV-B(1)a: Regularly monitor water quality at key ocean recreation sites.
- 2) The Historic Preservation State Functional Plan, Section 7.1.2.2, page 7-2
 - Issue Area I. Preservation of Historic Sites
 - Objective B: Protection of Historic Properties
 - Policy B.2. Establish and make available a variety of mechanisms to better protect historic properties.
 - Implementing Action B.2.c: Respond to the discovery of prehistoric/historic burials in a timely and sensitive manner, which

takes into consideration cultural concerns.

The DEIS lists proposed actions for this project that are consistent with HRS § 226-108(2) - the priority guidelines on sustainability.

- Section 4.1.10 Alternative Energy, pages 4-7 and 4-8 of the DEIS lists alternative energy sources that may be used to power the WWTP.

The project may use alternative energy sources such as Solar Thermal – Hot Water, Biosolids – Digestion, Biosolids – Fluid Bed Incineration, Biosolids – Gasification, or Solar Photovoltaic systems.

The Final Environmental Impact Statement (FEIS) should summarize the project's consistency to all of the goals, objectives, policies, and priority guidelines found in HRS Chapter 226. If any of these themes are not applicable, the FEIS should state it as "not applicable." The most efficient method is summarizing these in tabular form, followed by discussion passages.

5. Section 7.1.4, pages 7-3 of the DEIS is incomplete in regards to the project's adherence to the objectives and policies of the Hawaii Coastal Zone Management (CZM) program. The DEIS lists only the project's consistency to Recreational Resources and Coastal Ecosystems. The objectives and policies of the Hawaii CZM program include recreational resources, historic resources, scenic and open space resources, coastal ecosystems, economic uses, coastal hazards, managing development, public participation, beach protection, and marine resources. The FEIS must examine all of the objectives and policies as listed in HRS § 205A-2.

If the project is inconsistent with any of these objectives, the FEIS must list what steps will be taken by the applicant to ensure that the project adheres to these objectives and policies.

6. Section 7.1.5, page 7-5 of the DEIS includes a discussion on the Ocean Resources Management Plan (ORMP). It states that the proposed project is consistent with the ORMP and would help meet the goals of Management Priority #3, Goal B, as the improvements to the existing Honouliuli WWTP would have beneficial water quality impacts on surface, ground, and coastal waters in the project area. The project is consistent with the objectives of water recycling by the reuse of treated effluent from the WWTP.
7. The DEIS states that your agency is coordinating with the U.S. Army Corps of Engineers (USACE) to avoid impacts to wetlands and stream areas in the vicinity of the project area. Section 10.1.3, page 10-1 states that a Clean Water Act (CWA),

Ms. Lori M. K. Kahikina, P.E.

June 15, 2016

Page 4

Section 404 and/or a Rivers and Harbors Act (RHA), Section 10 are possible permits required of this action.

Furthermore, Section 10.1.3 states that the abandoned irrigation ditch located on the project site may need to be filled to construct the various site components for the WWTP expansion plans. The construction work would be performed in accordance with federal, state, and county regulatory requirements to limit the impact of storm runoff from the project site on surface water resources. The USACE, the U.S. Fish and Wildlife Service, the Department of Land and Natural Resources, the City and County of Honolulu, and other regulatory agencies will be consulted prior to any work performed on the ditch.

If the USACE requires a CWA Section 404, or a RHA Section 10 permit, the project may also need to be evaluated against Federal Consistency requirements. OP will be the lead State agency to conduct this evaluation. Please contact our office on the procedures on Federal Consistency Determinations.

We have no further comments at this time. If you have any questions regarding this comment letter, please contact Josh Hekeia of our office at (808) 587-2845.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Asuncion', followed by a period.

Leo R. Asuncion
Director

cc: Mr. Matthew Stimpson, AECOM ✓

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR DESIGNATE

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO:
PRO 17-042

March 23, 2017

Mr. Leo R. Asuncion, Director
State of Hawaii, Office of Planning
PO Box 2359
Honolulu, HI 96804

Dear Mr. Asuncion:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated June 15, 2016, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. The DEIS examines many of the plans, programs and policies that fall under the jurisdiction of OP.
2. Section 4.1.9 Stormwater Quantity and Quality Control, pages 4-6 and 4-7 of the DEIS states that the Honouliuli WWTP drainage design will incorporate best management practices and Low Impact Development (LID) principles to minimize the volume and improve the quality of storm water runoff from the facility and to comply with National Pollution Discharge Elimination System permit requirements and county drainage standards.

Furthermore, stormwater management retention/infiltration basins will be used throughout the WWTP site. These practices are consistent with LID features.

3. Section 5.3.2.2, Construction Impacts and Mitigation Measures, pages 5-7 to 5-8 of the DEIS examines erosion and sedimentation measures that will be employed during construction activities. It concludes that nearby off-site surface waters should not be impacted as a result of storm water during construction activities.

Response to Comments 1 to 3: Acknowledged.

4. The DEIS examines the Hawaii State Plan in Section 7.1.1, pages 7-1 to 7-2 address the project's consistency with several of the goals and objectives of Hawaii Revised Statutes (HRS) Chapter 226. The DEIS lists the following Hawaii State Plan themes:
 - HRS § 226-14 Objective and policies for facility systems; in general, (a), (b)(1), (2), (3), (4)
 - HRS § 226-15 Objectives and policies for facility systems; solid and liquid wastes, (a)(1)(2), (b)(1)(3)

The DEIS also lists the project's compatibility with two of the State Functional Plans, including:

- 1) The Recreation State Functional Plan, Section 7.1.2.1, page 7-2
 - Issue Area IV. Resource Conservation and Management
 - Objective IV-B: Prevent Degradation of the Marine Environment
 - Policy IV-B(1): Enhance water quality to provide high-quality ocean recreation opportunities.
 - Implementing Action IV-B(l)a: Regularly monitor water quality at key ocean recreation sites.
- 2) The Historic Preservation State Functional Plan, Section 7.1.2.2, page 7-2
 - Issue Area I. Preservation of Historic Sites
 - Objective B: Protection of Historic Properties
 - Policy B.2. Establish and make available a variety of mechanisms to better protect historic properties.
 - Implementing Action B.2.c: Respond to the discovery of prehistoric/historic burials in a timely and sensitive manner, which takes into consideration cultural concerns

The DEIS lists proposed actions for this project that are consistent with HRS § 226-108(2) -the priority guidelines on sustainability.

- Section 4.1.10 Alternative Energy, pages 4-7 and 4-8 of the DEIS lists alternative energy sources that may be used to power the WWTP.

The project may use alternative energy sources such as Solar Thermal- Hot Water, Biosolids - Digestion, Biosolids - Fluid Bed Incineration, Biosolids - Gasification, or Solar Photovoltaic systems.

The Final Environmental Impact Statement (FEIS) should summarize the project's consistency to all of the goals, objectives, policies, and priority guidelines found in HRS Chapter 226. If any of these themes are not applicable, the FEIS should state it as "not applicable." The most efficient method is summarizing these in tabular form, followed by discussion passages.

Response: We acknowledge the comment and have noted it in the text.

5. Section 7.1.4, pages 7-3 of the DEIS is incomplete in regards to the project's adherence to the objectives and policies of the Hawaii Coastal Zone Management (CZM) program. The DEIS lists only the project's consistency to Recreational Resources and Coastal Ecosystems. The objectives and policies of the Hawaii CZM program include recreational resources, historic resources, scenic and open space resources, coastal ecosystems, economic uses, coastal hazards, managing development, public participation, beach protection, and marine resources. The FEIS must examine all of the objectives and policies as listed in HRS § 205A-2.

If the project is inconsistent with any of these objectives, the FEIS must list what steps will be taken by the applicant to ensure that the project adheres to these objectives and policies.

Response: Acknowledged, text has been added to address this comment.

6. Section 7.1.5, page 7-5 of the DEIS includes a discussion on the Ocean Resources Management Plan (ORMP). It states that the proposed project is consistent with the ORMP and would help meet the goals of Management Priority #3, Goal B, as the improvements to the existing Honouliuli WWTP would have beneficial water quality impacts on surface, ground, and coastal waters in the project area. The project is consistent with the objectives of water recycling by the reuse of treated effluent from the WWTP.

Response: Acknowledged.

7. The DEIS states that your agency is coordinating with the U.S. Army Corps of

Engineers (USACE) to avoid impacts to wetlands and stream areas in the vicinity of the project area. Section 10.1.3, page 10-1 states that a Clean Water Act (CWA), Section 404 and/or a Rivers and Harbors Act (RHA), section 10 are possible permits required of this action.

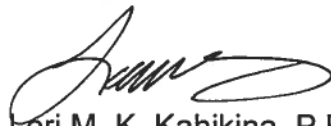
Furthermore, Section 10.1.3 states that the abandoned irrigation ditch located on the project site may need to be filled to construct the various site components for the WWTP expansion plans. The construction work would be performed in accordance with federal, state, and county regulatory requirements to limit the impact of storm runoff from the project site on surface water resources. The USACE, the U.S. Fish and Wildlife Service, the Department of Land and Natural Resources, the City and County of Honolulu, and other regulatory agencies will be consulted prior to any work performed on the ditch.

If the USACE requires a CWA Section 404, or a RHA Section 10 permit, the project may also need to be evaluated against Federal Consistency requirements. OP will be the lead State agency to conduct this evaluation. Please contact our office on the procedures on Federal Consistency Determinations.

Response: Acknowledged, text added to Section 10.1.3.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', with a stylized flourish at the end.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM



**STATE OF HAWAII
DEPARTMENT OF HEALTH**

P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

EPO 16-155

May 26, 2016

Ms. Anne Symonds, P.E.
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813
Email: Anne.Symonds@aecom.com

Dear Ms. Symonds:

**SUBJECT: Draft Environmental Impact Statement (DEIS) for Proposed Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Project, Ewa Beach, Oahu
TMK: 91013007 and 91069003**

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your DEIS to our office via the OEQC link:

http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Oahu/2010s/2016-05-08-OA-5B-DEIS-Honouliuli-Wastewater-Treatment-Plant-Secondary-Treatment-Improvements.pdf

EPO strongly recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments. EPO has recently updated the environmental Geographic Information System (GIS) website page. It now compiles various maps and viewers from our environmental health programs. The eGIS website page will be continually updated so please visit it regularly at: <http://health.hawaii.gov/epo/egis>.

EPO also encourages you to examine and utilize the Hawaii Environmental Health Portal at: <https://eha-cloud.doh.hawaii.gov>. This site provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings.

We suggest you review the requirements for the National Pollutant Discharge Elimination System (NPDES) permit. We recommend contacting the Clean Water Branch at (808) 586-4309 or cleanwaterbranch@doh.hawaii.gov after relevant information is reviewed at:

1. <http://health.hawaii.gov/cwb>
2. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/standard-npdes-permit-conditions>
3. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/forms>

Please note that all wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems". We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please review online guidance at: <http://health.hawaii.gov/wastewater> and contact the Planning and Design Section of the Wastewater Branch at 586-4294.

EPO recommends you review the need and/or requirements for a Clean Air Branch permit. The Clean Air Branch can be consulted via e-mail at: Cab.General@doh.hawaii.gov or via phone: (808) 586-4200.

Ms. Anne Symonds, P.E.
Page 2
May 26, 2016

If noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules, Chapter 11-46, "Community Noise Control". A noise permit may be required and should be obtained before the commencement of work. Please call the Indoor and Radiological Health Branch at (808) 586-4700 and review relevant information online at: <http://health.hawaii.gov/irhb/noise>.

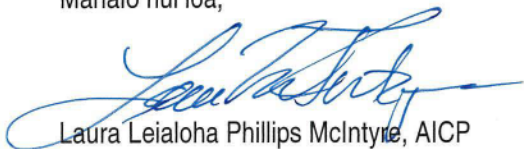
We advise that, if appropriate, the Hazard Evaluation and Emergency Response (HEER) Office's Site Discovery and Response (SDAR) Section be contacted. The SDAR section protects human health and the environment by identifying, investigating, and remediating sites contaminated with hazardous substances (non-emergency site investigations and cleanup). The HEER Office's SDAR Section can be contacted at: (808) 586-4249. For historical maps on lands where sugarcane was grown see: <http://health.hawaii.gov/epo/egis/sugarcane>

You may also wish to review the draft Office of Environmental Quality Control (OEQC) viewer at: <http://eha-web.doh.hawaii.gov/oeqc-viewer>. This viewer geographically shows where some previous Hawaii Environmental Policy Act (HEPA) {Hawaii Revised Statutes, Chapter 343} documents have been prepared.

In order to better protect public health and the environment, the U.S. Environmental Protection Agency (EPA) has developed a new environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and combines environmental and demographic indicators in maps and reports. EPO encourages you to explore, launch and utilize this powerful tool in planning your project. The EPA EJSCREEN tool is available at: <http://www.epa.gov/ejscreen>.

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design. Thank you for the opportunity to comment.

Mahalo nui loa,



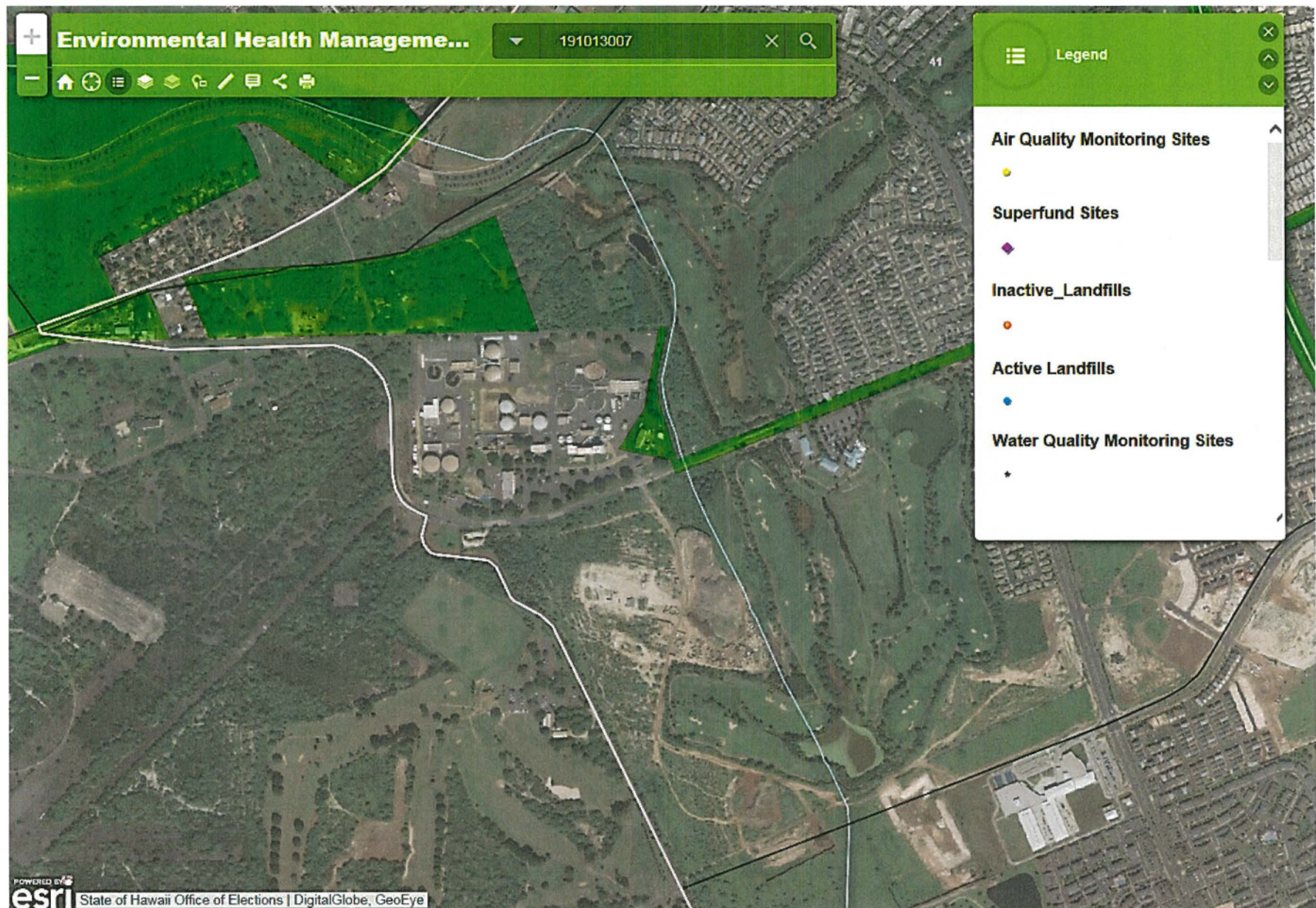
Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

LM:nn

Attachment 1: EPO Draft Environmental Health Management Map - Oahu
Attachment 2: Clean Water Branch: Water Quality Standards Map - Oahu
Attachment 3: Wastewater Branch: Recycled Water Use Map of Project Area
Attachment 4: Historic Sugarcane Map of Project Area
Attachment 5: OEQC Viewer Map of Project Area
Attachment 6: U.S. EPA EJSCREEN Report for Project Area

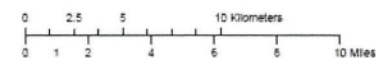
c: Marisol Olaes, City and County of Honolulu, Dept. of Environmental Services {via email: molaes@honolulu.gov}
DOH: CWB, WWB, IRHB, CAB, HEER {via email only}

EPO Draft Environmental Health Management Map: <http://health.hawaii.gov/epo/egis>



Pacific Ocean

Hawaii Department of Health Water Quality Standards Map of the ISLAND OF O'AHU



This map is a geographic representation of Hawaii State Water Quality Standards as set forth in Hawaii Administrative Rules Chapter 11-54, but is intended for reference only, not to substitute for the governing language in the Water Quality Standards.

Quality Standards Classifications

Inland Classifications

- Class 1
- Class 2

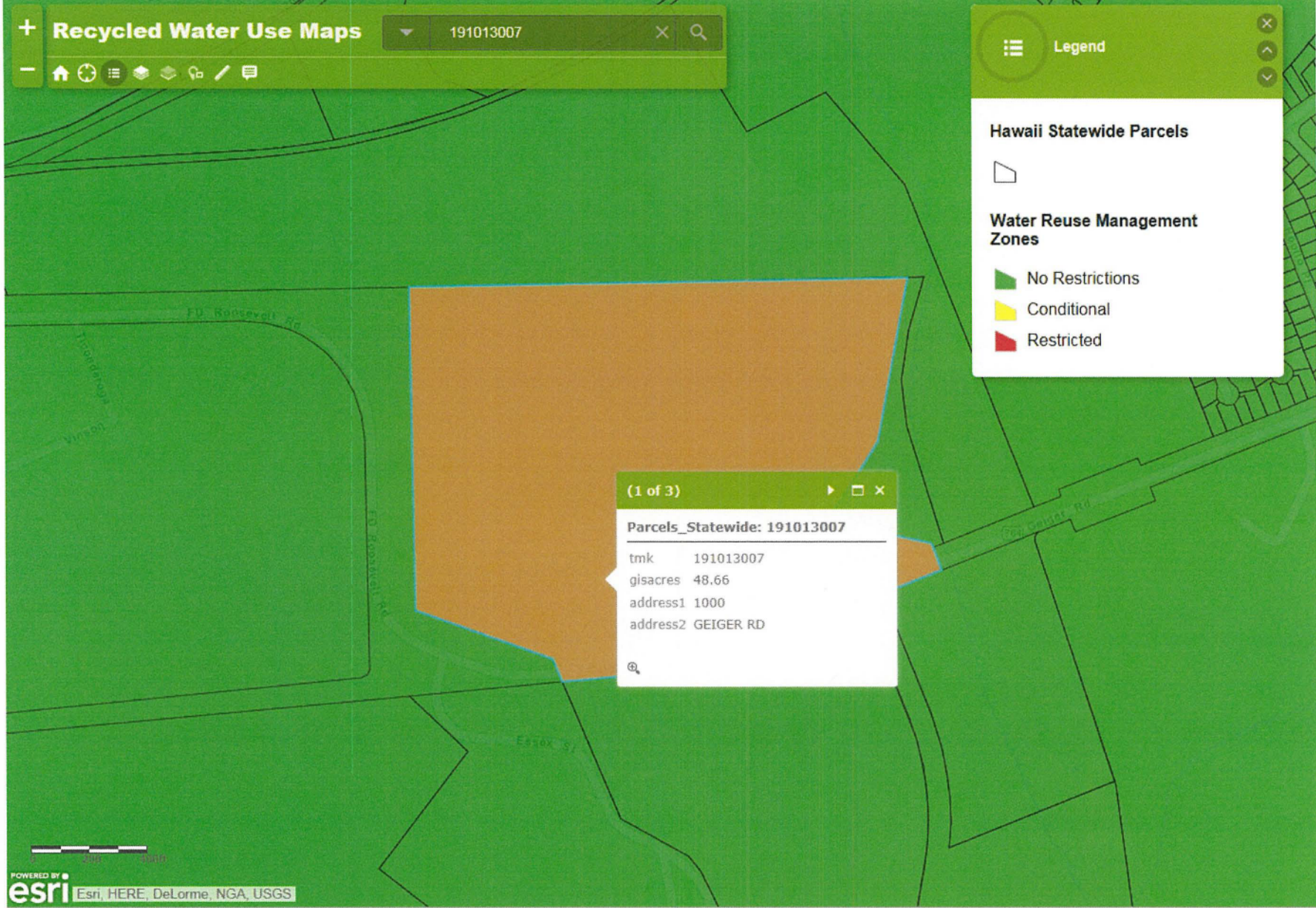
Marine Classifications

- A } Bounded by 100-fathom contour
- AA

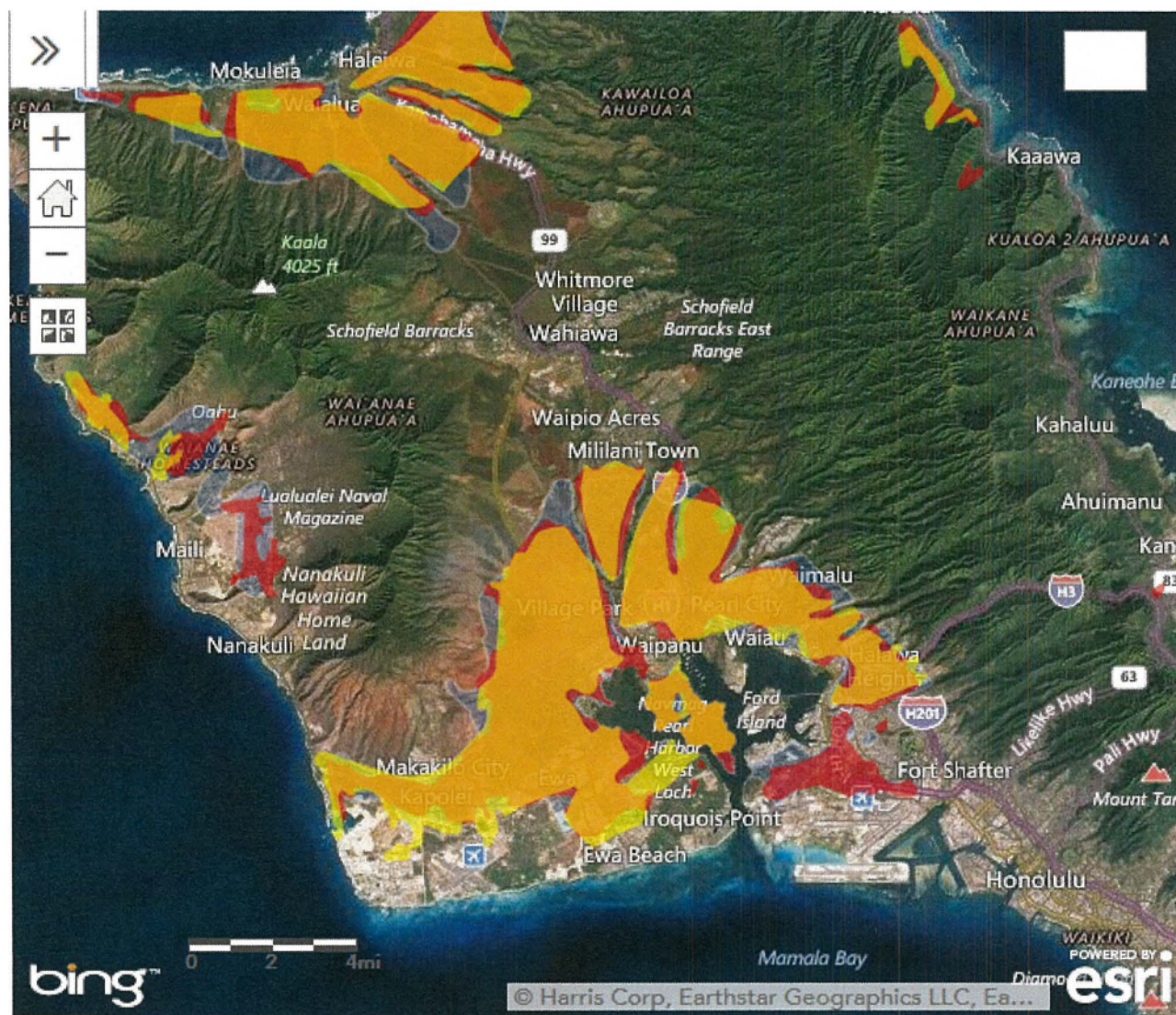


3 Mile Boundary Line: Areas situated within this line but outside of the 100-fathom contour are subject to Hawaii State Oceanic Water Quality Standards.

DRAFT



HISTORIC SUGARCANE LANDS MAP VIEWER





3 sites found

Results

Filter

Show sites with no location

Ewa Industrial Park (FEA-FONSI)
Environmental Assessment (Applicant)

HONOLULULI WASTEWATER TREATMENT
(FEA-FONSI)
Environmental Assessment (Agency)

Honouliuli Wastewater Ph1 (FEA-EISPN)
Environmental Impact Statement (Agency)



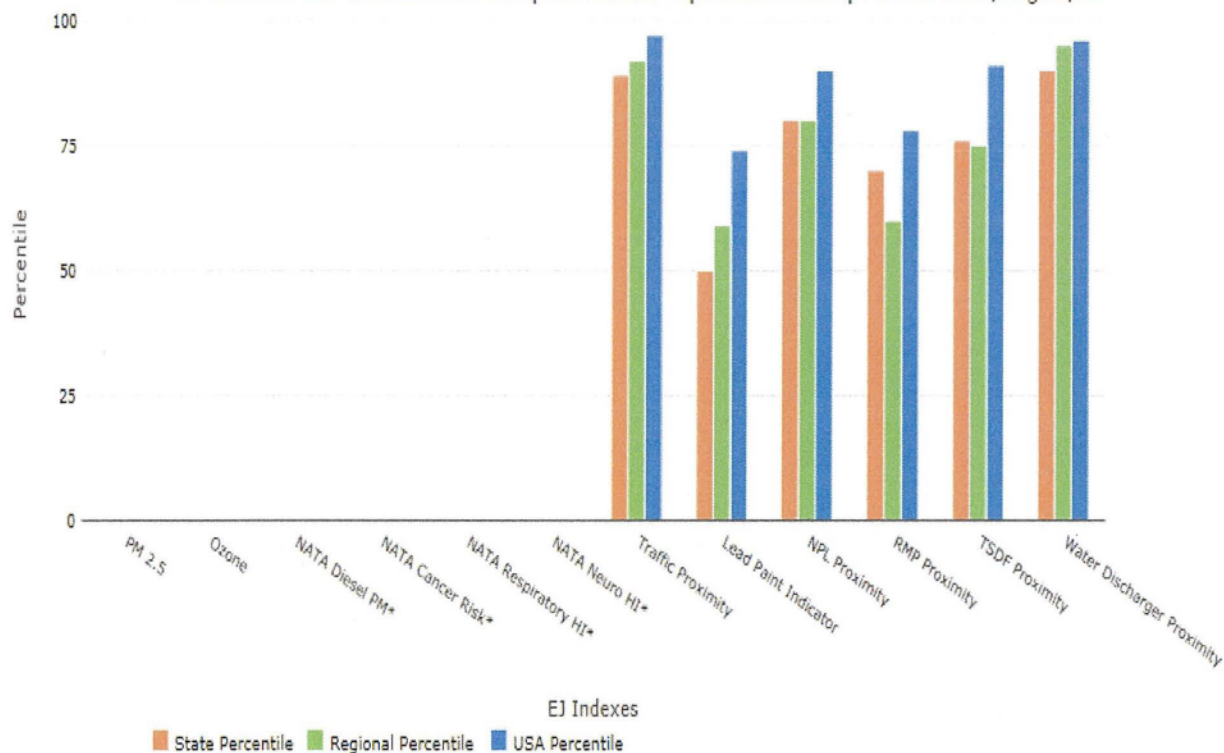


EJSCREEN Report for 1 mile Ring around the Corridor HAWAII, EPA Region 9 Approximate Population: 19108



Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	89	92	97
EJ Index for Lead Paint Indicator	50	59	74
EJ Index for NPL Proximity	80	80	90
EJ Index for RMP Proximity	70	60	78
EJ Index for TSDF Proximity	76	75	91
EJ Index for Water Discharger Proximity	90	95	96

EJ Index for the Selected Area Compared to All People's Block Groups in the State/Region/US



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



Selected Variables	Raw data	State Average	%ile in State	EPA Region Average	%ile in EPA Region	USA Average	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	45.1	N/A
NATA Diesel PM ($\mu\text{g}/\text{m}^3$)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Air Toxics Cancer Risk (risk per MM)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	500	280	88	190	90	110	95
Lead Paint Indicator (% pre-1960s housing)	0.058	0.17	37	0.25	37	0.3	27
NPL Proximity (site count/km distance)	0.13	0.092	77	0.11	78	0.096	81
RMP Proximity (facility count/km distance)	0.13	0.18	68	0.41	34	0.31	47
TSDF Proximity (facility count/km distance)	0.1	0.092	73	0.12	68	0.054	88
Water Discharger Proximity (count/km)	0.8	0.33	91	0.19	96	0.25	94
Demographic Indicators							
Demographic Index	50%	51%	46	46%	57	35%	74
Minority Population	86%	77%	58	57%	77	36%	88
Low Income Population	14%	25%	31	35%	21	34%	20
Linguistically Isolated Population	5%	6%	60	9%	45	5%	71
Population with Less Than High School Education	8%	10%	51	16%	34	14%	38
Population under Age 5	11%	6%	87	7%	84	7%	86
Population over Age 64	7%	14%	16	12%	30	13%	22

*The National-Scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-038

March 23, 2017

Ms. Laura L.P. McIntyre, AICP, Program Manager
State of Hawaii
Environmental Planning Office
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Ms. McIntyre,

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter to AECOM dated May 26, 2016, reference no. EPO 16-155, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. EPO strongly recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments. EPO has recently updated the environmental Geographic Information System (GIS) website page. It now compiles various maps and viewers from our environmental health programs. The eGIS website page will be continually updated so please visit it regularly at: <http://health.hawaii.gov/epo/egis>.

Response: Acknowledged the website will be monitored during the design process and utilize available strategies for sustainable and healthy designs.

2. EPO also encourages you to examine and utilize the Hawaii Environmental Health Portal at: <https://eha-cloud.doh.hawaii.gov>. This site provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings.

Response: Acknowledged the Hawaii Environmental Health Portal should be used to determine applicable permitting requirements.

3. We suggest you review the requirements for the National Pollutant Discharge Elimination System (NPDES) permit. We recommend contacting the Clean Water Branch at (808) 586-4309 or cleanwaterbranch@doh.hawaii.gov after relevant information is reviewed at:
 - a. <http://health.hawaii.gov/cwb>
 - a. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/standard-npdes-permit-conditions>
 - b. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/forms>

Response: Acknowledged, requirements for the NPDES will be followed during the project, and the project team will coordinate with DOH Clean Water Branch.

4. Please note that all wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems". We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please review online guidance at: <http://health.hawaii.gov/wastewater> and contact the Planning and Design Section of the Wastewater Branch at 586-4294.

Response: Acknowledged plans will be submitted to the DOH Wastewater Branch for review and comment.

5. EPO recommends you review the need and/or requirements for a Clean Air Branch permit. The Clean Air Branch can be consulted via e-mail at: Cab.General@doh.hawaii.gov or via phone: (808) 586-4200. If noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules,

Chapter 11-46, Community Noise Control". A noise permit may be required and should be obtained before the commencement of work. Please call the Indoor and Radiological Health Branch at (808) 586-4700 and review relevant information online at: <http://health.hawaii.gov/irhb/noise>.

Response: Acknowledged Air and Noise permits will be obtained as required, and follow applicable guidelines.

6. We advise that, if appropriate, the Hazard Evaluation and Emergency Response (HEER) Office's Site Discovery and Response (SDAR) Section be contacted. The SDAR section protects human health and the environment by identifying, investigating, and remediating sites contaminated with hazardous substances (non-emergency site investigations and cleanup). The HEER Office's SDAR Section can be contacted at: (808) 586-4249. For historical maps on lands where sugarcane was grown, see: <http://health.hawaii.gov/epo/egis/sugarcane>.

Response: Acknowledged, borings and research of the project site doesn't reveal evidence of contaminated soil. However, we will notify the SDAR of the project and solicit feedback.

7. In order to better protect public health and the environment, the U.S. Environmental Protection Agency (EPA) has developed a new environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and combines environmental and demographic indicators in maps and reports. EPO encourages you to explore, launch and utilize this powerful tool in planning your project. The EPA EJSCREEN tool is available at <http://www.epa.gov/ejscreen>.

Response: Acknowledged and reviewed the EJSCREEN tool.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,



Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

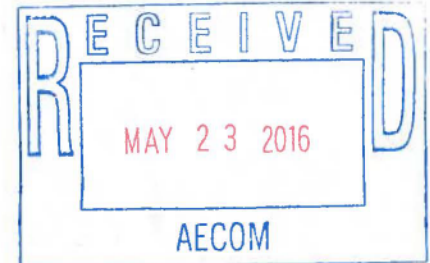
STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
EMD/CWB

05031PCTM.16

May 18, 2016

Ms. Anne Symonds, P.E.
Water/Wastewater Manager
AECOM
1001 Bishop Street, Suite 1600
Honolulu, Hawaii 96813



Attention: Mr. Matthew Stimpson
Consultant

Dear Ms. Symonds:

**SUBJECT: Comments on the Draft Environmental Impact Statement (DEIS) for
Honouliuli Wastewater Treatment Plant Secondary Treatment and
Support Facilities
TMKs: (1) 9-1-013:017, (1) 9-1-069:004 and (1) 9-1-069:003
Ewa, Island of Oahu, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated May 8, 2016. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at:

<http://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf>

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55).

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements.

Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.
5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
 - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects

natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

- b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
- c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.
- d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.
- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

If you have any questions, please visit our website at: <http://health.hawaii.gov/cwb/>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,


ALEC WONG, P.E., CHIEF
Clean Water Branch

CTM:bk

- c: EPO # 16-155 [via e-mail only]
Mr. Matthew Stimpson, AECOM [via e-mail matthew.stimpson@aecom.com only]
Ms. Marisol Olaes, City & County of Honolulu, Department of Environmental Services
[via e-mail molaes@honolulu.gov only]
Mr. Jack Pobuk, City & County of Honolulu, Department of Environmental Services
[via e-mail jpobuk@honolulu.gov only]

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonorolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-037

March 23, 2017

Mr. Alec Wong, P.E., Chief
State of Hawaii, Department of Health
Clean Water Branch
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Mr. Wong,

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter to AECOM dated May 18, 2016, reference no.
05031PCTM.16, regarding the Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities
Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Anti-degradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

Response: We acknowledge and have reviewed the rules and regulations. Applicable permits will be appropriately obtained during the design phase of the project.

2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

Response: We acknowledge your comments. All permits associated with water quality and construction will be appropriately obtained during the design phase of the project.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements. Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401 (a)(1), a Section 401 Water Quality Certification (WQC) is required for "any applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters ..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.

Response: We acknowledge your comments. All permits associated with water quality and construction will be appropriately obtained during the design phase of the project.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in

HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

Response: We acknowledge your comments. All permits associated with water quality and construction will be appropriately obtained during the design phase of the project.

5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
 - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.
 - b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
 - c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.
 - d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.

- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

Response: We acknowledge your comments. All permits associated with water quality and construction will be appropriately obtained during the design phase of the project. It is noteworthy that the WWTP currently uses, and will continue to use, R1 recycled water for various irrigation, in-plant re-use, and other non-potable uses within the WWTP, which helps to minimize the potable water usage.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', with a stylized flourish at the end.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File
LUD - 19 1 013 007 DEIS
Honouliuli WWTP-ID2762

May 20, 2016

Ms. Marisol Olaes
City & County of Honolulu
Department of Environmental Services
1000 Uluohia Street Suite 308
Kapolei, Oahu, Hawaii 96707

16 MAY 25 P3:14

DEPARTMENT OF
ENVIRONMENTAL SVCS

Dear Ms.Olaes:

Subject: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Facilities Plan, Honouliuli Wastewater
Treatment Plant Secondary Treatment and Support Facilities,
91-1000 Geiger Road, Ewa Beach, Oahu, HI 96706
Honouliuli WWTP: TMK (1) 9-1-013: 007, 9-1-069: 004
Honouliuli WWTP Expansion Area: TMK (1) 9-1-069: 003

Thank you for allowing us the opportunity to provide comments on the above subject project. Please be informed that all wastewater plans shall conform to applicable provisions of Hawaii Administrative Rules, Chapter 11-62, "Wastewater Systems" as amended on March 21, 2016.

Should you have any questions, please call Mark Tomomitsu of our Branch at 586-4294.

Sincerely,

A blue ink signature of Sina Pruder, Chief of the Wastewater Branch.

SINA PRUDER, P.E., CHIEF
Wastewater Branch

LM/MST:lmj

c: Ms. Laura McIntyre, DOH-Environmental Planning Office , via email
Mr. George I. Atta, C&C of Honolulu, Dept. of Planning & Permitting 7th Floor

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-043

March 23, 2017

Sina Pruder, PE, Chief
Wastewater Branch
State of Hawaii, Department of Health
PO Box 3378
Honolulu, HI 96801-3378

Dear Ms. Pruder:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your letter dated May 20, 2016, reference no. LUD-19 1 013 007
DEIS Honouliuli WWTP-ID2762, regarding the Honouliuli Wastewater Treatment Plant
Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and
Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your letter:

1. Please be informed that all wastewater plans shall conform to applicable provisions of Hawaii Administrative Rules, Chapter 11-62, "Wastewater Systems" as amended on March 21, 2016.

Response: Acknowledged, text has been added to reference the HAR Chapter.

We appreciate your time and effort in reviewing the DEIS. Your letter, along with

Ms. Sina Pruder, P.E.
March 23, 2017
Page 2

this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', written in a cursive style.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Honouliuli Wastewater Treatment Plant
Secondary Treatment and Support Facilities Draft EIS

Public Meeting - June 14, 2016 at Kapolei Middle School, 91-5335 Kapolei Pkwy, Kapolei, HI 96707

Comment Sheet

(Please Print)

Name: Michael Cubas

Email Address: mcubas@hbws.org

Mailing Address (including zip code): _____

How do you prefer to be notified of updates and public participation opportunities? ☐ E-Mail ☐ Mail

How did you hear about the meeting? Please check all that apply.

☐ Newsletter ☒ Flyer ☐ Newspaper ☐ Radio ☐ Friend/Family ☐ Other: _____

Do you represent a group or organization? If so, please check your affiliation below:

☐ Resident ☐ Business ☒ Local Official ☐ Interest Group ☐ Other: BWS Employee

Your comments are important to us. Please respond to the following questions. If you need more space, please attach additional comment sheets or paper.

- 1.) Do you have any comments or suggestion about the Draft Environmental Impact Statement?

- 2.) Please provide any additional comments or suggestions regarding the proposed project. Please identify any natural, cultural, or community resources in the project area that are important to you.

- 3.) Please rate and comment on the public workshop material (Rank items 1 to 5, with 1 being not effective and 5 being excellent or highly effective.)

Public Meeting Material	Poor to Excellent					Comments/Suggestions
Meeting notification	1	2	3	4	5	
Meeting length/time	1	2	3	4	5	
Presentation video	1	2	3	4	5	
Displays/handouts	1	2	3	4	5	
Discussion with project team	1	2	3	4	5	
Other:	1	2	3	4	5	

- 4.) Other Comments:

Q: How was your Flow to the WWTP Calculated? How is Sanitary Flow Calculated?

Q: What are the estimated Potable demands for the improvements?

The # of Staff. Not far enough in design

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO
PRO 17-044

March 23, 2017

Mr. Michael Cubas
Board of Water Supply
City and County of Honolulu
630 South Beretania St.
Honolulu, HI 96843

Dear Mr. Cubas:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your attendance at the June 14, 2016, public meeting regarding the Honouliuli Wastewater Treatment Plant Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to your comments:

1. How was the WWTP flow calculated: How is sanitary flow calculated?

Response: The calculation of WWTP flows are documented in Technical Memorandum "Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan - Updated Basis of Design Population, Flows, and Loads, Item 4.F.1", June 2012. Sanitary flows are based on population projections, which were derived from information obtained from the Hawaii Department of Business, Economic Development, and Tourism (DBEDT) and the CCH Department of Planning and Permitting (DPP).

2. What are the estimated potable demands for the improvements? The # of staff. Not far enough in design.

Mr. Michael Cubas
March 23, 2017
Page 2

Response: Refer to Section 5.13.1, Water, in the DEIS, regarding potable water service. An estimate of the potable and non-potable water needs will be done as the project design is developed, and the construction drawings and application will be appropriately submitted to BWS for review and approval. As stated in Section 5.13.1, some water system improvements may be required.

We appreciate your time and effort in reviewing the DEIS. Your comments, along with this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', with a stylized, flowing script.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM

From: Liu, Rouen
To: [Olaes, Marisol](#); [Stimpson, Matthew](#)
Cc: [Kuwaye, Kristen](#)
Subject: Draft EIS for the Honoulluli Wastewater Treatment Plant Facilities Plan
Date: Friday, May 20, 2016 2:35:10 PM

Dear Ms. Olaes and Mr. Stimpson,

Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objection to the project. Should HECO have existing easements and facilities on the subject property, we will need continued access for maintenance of our facilities. We appreciate your efforts to keep us apprised of the subject project in the planning process. As the proposed wastewater treatment plant project comes to fruition, please continue to keep us informed. Further along in the design, we will be better able to evaluate the effects on our system facilities. If you have any questions, please call me at 1-808-543-7245.

Sincerely,

Rouen Q. W. Liu
Permits Engineer
Hawaiian Electric Company, Inc.
Tel: (808) 543-7245
Email: Rouen.liu@hawaiianelectric.com

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and/or privileged information. Any unauthorized review, use, copying, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender immediately by reply e-mail and destroy the original message and all copies.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL
MAYOR



LORI M.K. KAHIKINA, P.E.
DIRECTOR DESIGNATE

TIMOTHY A. HOUGHTON
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO:
PRO 17-041

March 23, 2017

Mr. Rouen Q. W. Liu, Permits Engineer
Hawaiian Electric Company, Inc.
Email: Rouen.liu@hawaiianelectric.com

Dear Mr. Liu:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the
Honouliuli Wastewater Treatment Plant Facilities Plan,
Honouliuli Wastewater Treatment Plant Secondary Treatment
and Support Facilities, Oahu, Hawaii

Thank you for your email to the City and County of Honolulu dated May 20, 2016, regarding the Honouliuli Wastewater Treatment Plan Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities Draft Environmental Impact Statement (DEIS).

We offer the following responses to the comments in your email:

1. Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objection to the project. Should HECO have existing easements and facilities on the subject property, we will need continued access for maintenance of our facilities. We appreciate your efforts to keep us apprised of the subject project in the planning process. As the proposed wastewater treatment plant project comes to fruition, please continue to keep us informed. Further along in the design, we will be better able to evaluate the effects on our system facilities.

Response: We acknowledge your review of the document. The project team will appropriately keep your office informed of the project as it proceeds through design.

We appreciate your time and effort in reviewing the DEIS. Your email, along with

Mr. Rouen Q. W. Liu
March 23, 2017
Page 2

this response, will be reproduced and included in the forthcoming Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori M. K. Kahikina', written in a cursive style.

Lori M. K. Kahikina, P.E.
Director

cc: Matthew Stimpson, AECOM