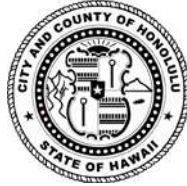


**DEPARTMENT OF ENVIRONMENTAL SERVICES
KA 'OIHANA LAWELawe KAIĀPUNI
CITY AND COUNTY OF HONOLULU**

1000 ULU'ŌHI'A STREET, SUITE 308 • KAPOLEI, HAWAII 96707
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IN REPLY REFER TO:
WEC.PE 25-033

September 16, 2025

Ms. Mary Alice Evans, Director
Office of Planning and Sustainability Development
State of Hawai'i
235 South Beretania Street, 6th Floor
Honolulu, Hawai'i 96813

Dear Ms. Evans:


SUBJECT: Pacific Palisades Wastewater Pump Station - Fuel Storage Tank
Improvement
TMK 9-7-091: 071
Pearl City, O'ahu

The City and County of Honolulu, Department of Environmental Services is transmitting the subject Draft Environmental Assessment and Anticipated Finding of No Significant Impact (DEA-AFONSI) for the subject project. The DEA-AFONSI has been prepared pursuant to Chapter 343, Hawai'i Revised Statutes, and Chapter 11-200.1, Hawai'i Administrative Rules.

We respectfully request that the DEA-AFONSI be published in the next available issue of the Environmental Notice. Materials required for the publication are being provided via the Environmental Review Program's online form.

Should you have any questions, please contact Audrey Uyema Pak from our Division of Wastewater Engineering and Construction at (808) 768-8766.

Sincerely,


Digitally signed by
Babcock, Roger W
Date: 2025.09.17
12:04:45 -10'00'

Roger Babcock, Jr., Ph.D., P.E.
Director

Enclosure

cc: ENV/OAS

From: dbedt.opsd.erp@hawaii.gov
To: [DBEDT OPSD Environmental Review Program](#)
Subject: New online submission for The Environmental Notice
Date: Wednesday, December 31, 2025 9:08:36 AM

Action Name

Fuel Storage Tank Improvements Pacific Palisades Wastewater Pump Station

Type of Document/Determination

Draft environmental assessment and anticipated finding of no significant impact (DEA-AFNSI)

HRS §343-5(a) Trigger(s)

- (1) Propose the use of state or county lands or the use of state or county funds

Judicial district

Honolulu, O'ahu

Tax Map Key(s) (TMK(s))

(1) 9-7-091:071

Action type

Agency

Other required permits and approvals

None

Proposing/determining agency

Department of Environmental Services

Agency jurisdiction

City and County of Honolulu

Agency contact name

Audrey Uyema Pak

Agency contact email (for info about the action)

audrey.uyemapak@honolulu.gov

Email address for receiving comments

comments@townscapeinc.com

Agency contact phone

(808) 768-8766

Agency address

1000 Uluohia Street, Suite 308
Kapolei, HI 96707
United States
[Map It](#)

Is there a consultant for this action?

Yes

Consultant

Townscape, Inc.

Consultant contact name

Gabrielle Sham

Consultant contact email

gabrielle@townscapeinc.com

Consultant contact phone

(808) 536-6999

Consultant address

900 Fort Street Mall, Suite 1160
Honolulu, HI 96813
United States
[Map It](#)

Action summary

The Pacific Palisades Wastewater Pump Station has an underground storage tank that supplies fuel to a standby generator. The generator automatically activates during a power outage and provides electricity for the entire pump station, including the sewage pump, support equipment, and lighting. To comply with current fuel storage regulations and strengthen environmental protection, the City Department of Environmental Services, Division of Wastewater Engineering and Construction, is proposing to replace the existing 1,000-gallon underground fuel storage tank with a new 1,000-gallon aboveground tank. The project also includes replacing the underground fuel piping, fuel monitoring panel, associated sensors, and connecting the new fuel monitoring panel to the supervisory control and data acquisition (SCADA) system.

Reasons supporting determination

Refer to Section 6.

Attached documents (signed agency letter & EA/EIS)

- [WEC.PE-25-033_Pacific_Palisades_Ada_Final1.pdf](#)
- [Pacific-Palisades-EA-Draft_Complete_ADA_to_ERP.pdf](#)

ADA Compliance certification (HRS §368-1.5):

The authorized individual listed below certifies that documents submitted are unlocked, searchable, and ADA compliant. Audio files include transcripts, captions, or alternative descriptions.

Action location map

- [Project-Site3.zip](#)

Authorized individual

Gabrielle Sham

Authorized individual email

gabrielle@townscapeinc.com

Authorized individual phone

(808) 536-6999

Authorization

- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

**Draft Environmental Assessment
for the
Fuel Storage Tank Improvements
Pacific Palisades Wastewater Pump Station
in Mānana, Island of O‘ahu, Hawai‘i**



Prepared For:

City and County of Honolulu
Department of Environmental Services



CITY AND COUNTY OF
HONOLULU



Prepared By:



TOWNSCAPE, INC.
Environmental & Community Planning

January 2026

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**Draft Environmental Assessment
Fuel Storage Tank Improvements
Pacific Palisades Wastewater Pump Station
in Mānana,
Island of O‘ahu, Hawai‘i**

Tax Map Key (1) 9-7-091:071

This environmental document has been prepared pursuant to
Chapter 343, Hawai‘i Revised Statutes.

Prepared For:

City and County of Honolulu
Department of Environmental Services
1000 Ulu‘ōhi‘a Street Suite 308
Kapolei, Hawai‘i 96707

Prepared By:

Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawai‘i 96813

January 2026

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LIST OF ABBREVIATIONS

<u>Abbreviation</u>	<u>Definition</u>
AST	Aboveground Storage Tank
ATS	Automatic Transfer Switch
BMPs	Best Management Practices
CRB	Coconut Rhinoceros Beetle
CSH	Cultural Surveys Hawai'i, Inc.
DLNR	Department of Land and Natural Resources
DOFAW	Division of Forestry and Wildlife
DOH	Department of Health
DP	Development Plan
EA	Environmental Assessment
FONSI	Finding of No Significant Impact
HAR	Hawai'i Administrative Rules
HECO	Hawaiian Electric Company, Inc.
HFD	City and County of Honolulu Fire Department
HPD	City and County of Honolulu Police Department
HRS	Hawai'i Revised Statutes
LUO	Land Use Ordinance
MCC	Motor Control Center
MGD	Million gallons per day
NFPA	National Fire Protection Association
PUC	Primary Urban Center
ROH	Revised Ordinances of Honolulu
SCADA	Supervisory Control and Data Acquisition
SHPD	State Historic Preservation Division
SLR	Sea level rise
SMA	Special Management Area
TMK	Tax Map Key
UST	Underground Storage Tank
WWPS	Wastewater Pump Station
WWTP	Wastewater Treatment Plant

PROJECT SUMMARY

Project Name:	Fuel Storage Tanks Improvements Pacific Palisades Wastewater Pump Station
Proposing and Determining Agency:	City & County of Honolulu Department of Environmental Services 1000 Ulu'ōhi'a Street Suite 308 Kapolei, Hawai'i 96707
HRS, Chapter 343 Trigger:	Use of County funds and lands
Location:	Mānana, O'ahu, Hawai'i
Tax Map Key:	(1) 9-7-091:071
Project Address:	1810 Komo Mai Drive Pearl City, HI 96782
Land Area:	1.4385 acres (or 62,659 square feet) parcel area
Recorded Fee Owner:	City & County of Honolulu
Existing Use:	Wastewater Pump Station
Proposed Use:	Wastewater Pump Station
Community Plan Region:	Primary Urban Center
Land Use Designations:	
State Land Use	Urban
County Zoning	P-2 General Preservation
Special Management Area:	Not in Special Management Area
Proposed Action:	The proposed project involves replacing the existing underground fuel storage tank with a new 1,000-gallon aboveground fuel storage tank, replacing the underground fuel piping, fuel monitoring panel, and all associated sensors, as well as connecting the new fuel monitoring panel to the supervisory control and data acquisition (SCADA) system.
Agency Determination:	Anticipated Finding of No Significant Impact

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1. SETTING AND PROJECT DESCRIPTION

1.1. Background and Need

The Pacific Palisades Wastewater Pump Station (WWPS), owned and operated by the City and County of Honolulu, has been in service since 1983. It serves a residential area of approximately 349 acres. The Pacific Palisades WWPS contains an underground storage tank (UST) that stores fuel for a standby generator, which automatically activates during an outage and provides full operational power to the pump station, including the sewage pump, support equipment, and lighting.

To comply with current fuel storage regulations and to strengthen environmental protection efforts, the City Department of Environmental Services Division of Wastewater Engineering and Construction is proposing to upgrade the existing UST along with making other related improvements. Pursuant to Hawai'i Administrative Rules (HAR) 11-280.1, USTs and piping must have secondary containment and use interstitial monitoring to detect releases from tanks and piping by July 15, 2028. The rules are designed to regulate the release of fluids from outdated tanks due to structural failure, corrosion, or spills and overfills.

The WWPS operates daily using electricity supplied by Hawaiian Electric Company, Inc. (HECO). However, during power outages, the generator provides backup power to ensure continued operation. Without the backup power system, the WWPS could experience system downtime and sewage backups, both of which are costly and environmentally harmful. In addition to improving the existing UST, upgrades to the fuel monitoring panels are needed. The fuel monitoring panels detect fuel levels and inform the City when fuel is low. Monitoring fuel levels allows for timely refueling, which helps to ensure the generator is ready to use. The new panel will include sensors that provide real-time data on fuel levels within the storage tanks.

Environmental review of this project is required by Hawai'i Revised Statutes (HRS) Chapter 343. The statutory trigger for the preparation of this Environmental Assessment (EA) is the use of County funds and lands.

1.2. Proposed Action

Improvements to the WWPS include replacing the existing UST system and piping with a new 1,000-gallon aboveground storage tank (AST). The project will replace the underground fuel piping, fuel monitoring panel, and all associated sensors, and will connect the new fuel monitoring panel to the supervisory control and data acquisition (SCADA) system.

1.3. Site Location and Description

The Pacific Palisades WWPS is located at 1810 Komo Mai Drive in the ahupua'a of Mānana, district of 'Ewa, on the island of O'ahu. It is in an undeveloped area adjacent to a residential neighborhood and near the Waimano stream.

The Pacific Palisades WWPS parcel is approximately 1.438 acres (62,659 square feet). It is secured with a six-foot tall chain-link fence with barbed wire around the perimeter with a double swing gate. Vehicular access to the project site is via an asphalt paved, easement driveway along Lanikeha Place. The driveway is narrow and situated between two homes. Existing bollards protect the existing WWPS building and the UST pad and curbs east of the building.

The State land use designation for the project site is Urban (see Figure 2), which is characterized by city-like concentrations of people, structures and services. Urban land uses are subject to the City's land use policies and controls. The City's Land Use Ordinance (LUO) classifies the project site as P-2 General Preservation (see Figure 3). P-2 is the General Preservation District and according to LUO §21-3.40, are "lands designated urban by the State, but well-suited to the functions of providing visual relief and contrast to the City's built environment, or serving as outdoor space for the public's use and enjoyment" and for "areas unsuitable for other uses because of topographical considerations related to public health, safety, and welfare concerns."

1.4. Existing Facility

1.4.1. Pump Station Description

This section is based on information described in the Pacific Palisades WWPS Operations Manual prepared by Fukunaga & Associates, Inc. (2012) and the Draft Preliminary Engineering Report prepared by Okahara and Associates, Inc. (2025). An existing site plan for the WWPS facility is provided in Figure 4.

With an average design flow of 0.5 million gallons per day (mgd) and a peak flow of 1.5 mgd, the Pacific Palisades WWPS collects wastewater from a low point in its service area and pumps it across the Waimano Stream and City and County of Honolulu roads through a 10-inch force main. This force main extends 2,926 linear feet to a 12-inch sewer line, where the wastewater then flows by gravity to the Pearl City Wastewater Pump Station and eventually conveyed to the Honouliuli Wastewater Treatment Plant (WWTP). The Pacific Palisades WWPS service area consists of gravity sewers from residential lots.

1.4.2. Power and Fuel System

The Pacific Palisades WWPS facility has a backup power system that detects when there is a power outage from HECO. The system has two main components: a standby generator and an automatic transfer switch.

The backup power system includes a 260 kW, diesel standby generator. Its fuel system consists of a 50-gallon day tank located inside the generator building and a 550-gallon, double-walled fiberglass UST located east of the building. The UST supplies fuel to the day tank through underground supply and return fuel piping that runs from the UST to the outside of the generator building. From there, the fuel piping transitions to aboveground piping leading into the day tank. The supply line passes through a fuel filter. Existing aboveground fuel piping is black steel, while underground fuel piping is fiberglass with double containment.

The UST is approximately 156 feet above mean sea level at its invert. It is equipped with a sump leak sensor and a fuel inventory sensor. A fuel monitoring panel provides leak detection and tracks fuel levels through the sump and inventory probes installed in the UST.

In the event of a commercial power outage, the Automatic Transfer Switch (ATS), transfers the pump station's load from normal utility power to the emergency generator. When utility power is restored, the ATS switches the system back to normal HECO service.

1.4.3. Electrical and Monitoring Systems

The facility receives electricity from HECO through the motor control center (MCC) located on the second floor designated as the Motor Room. The MCC service is 480V, three-phase delta and is rated at 400A. It serves the sewage pumps, compressors, a 30kVA dry-type transformer, and various other equipment. The transformer secondary feeds Power Panel "A" at 208Y/120V three-phase, 4 Wire.

The day tank is fed by Panel A circuit 15 and the existing fuel monitoring panel is fed by Panel A circuit 13. Both the day tank and fuel monitoring panel are connected to the SCADA cabinet on the second floor Motor Building.

1.5. Project Details

The proposed project includes the following actions (see Figures 5 to 9):

Civil

- Remove the existing eight pipe bollards.
- Excavate and trench areas to remove the existing UST and to install the new AST, including associated fuel lines, conduits, vent line, housekeeping pads, pipe bollards, and associated components. Backfill to the bottom of the surface restoration layer. Restore the surface of the excavated and trenched area to match adjacent surfaces, including but not limited to asphalt pavement, concrete curbs, and concrete pavement.
- Install six new concrete-filled steel pipe bollards to protect the new AST from vehicular traffic.
- Install new concrete curb in the restored area of the removed existing UST where the ground is exposed and where trenching work damages the existing curb.

Architectural

- Paint existing exterior masonry walls and miscellaneous surface incidental to scope using existing colors.
- Paint a minimum of one prime coat and two finish coats on all interior surfaces incidental to scope, conforming to existing standard color palette.
- In-fill and patch existing penetrations and install new wall penetrations.

Structural

- Install concrete pads for the new AST and new day tank in the Generator Room. Provide 18-inch of clearance under the tank for maintenance purposes.

Mechanical

- Replace the existing 550-gallon UST with a new 1,000-gallon ConVault AST to the north of the Generator Room.
- Remove existing underground fuel supply and fuel return piping and install new aboveground fuel supply and return piping (one-inch Type 316 Stainless Steel) from the AST to the day tank. New penetrations for fuel supply, return, and electrical conduits will be made.

- The existing wall-mounted fuel monitoring panel, sensors, conduits and appurtenances will be removed and replaced with new conduits and wired connection from the fuel tank to a new monitoring panel.
- Install a SCADA compatible fuel monitoring panel. Fuel monitoring points will be mapped to the WWPS's existing SCADA system and be compliant with City SCADA standards for WWPS.
- Install interstitial monitor and inventory sensors to the AST and integrated with the fuel monitoring panel.
- Replace the existing 50-gallon fuel oil day tank with a new 60-gallon day tank with two supply pumps, one return pump, and one hand pump.
- Install a temporary generator when the backup power system needs to be taken offline during construction.

Electrical

- Reroute and replace electrical conduits and wiring to accommodate the new AST location.
- Re-use existing interior conduit where feasible and extend it to the new AST connection point.
- Power the new fuel monitoring panel from Panel A, as existing capacity is sufficient.
- Reconnect the existing SCADA alarm point for fuel system failure.
- Add new SCADA monitoring points for tank inventory and leak detection.
- Install new conduit and wiring to support additional electrical loads from the day tank.
- Power the new day tank control panel and pumps from Panel A using existing breakers.
- Provide disconnect switches for the day tank pumps for safety and maintenance access.
- Reconnect the SCADA alarm for day tank system failure.
- Use spares in the existing SCADA input modules for new additional monitoring SCADA points.

Figure 1 Location and Vicinity Map



Figure 2 State Land Use Map

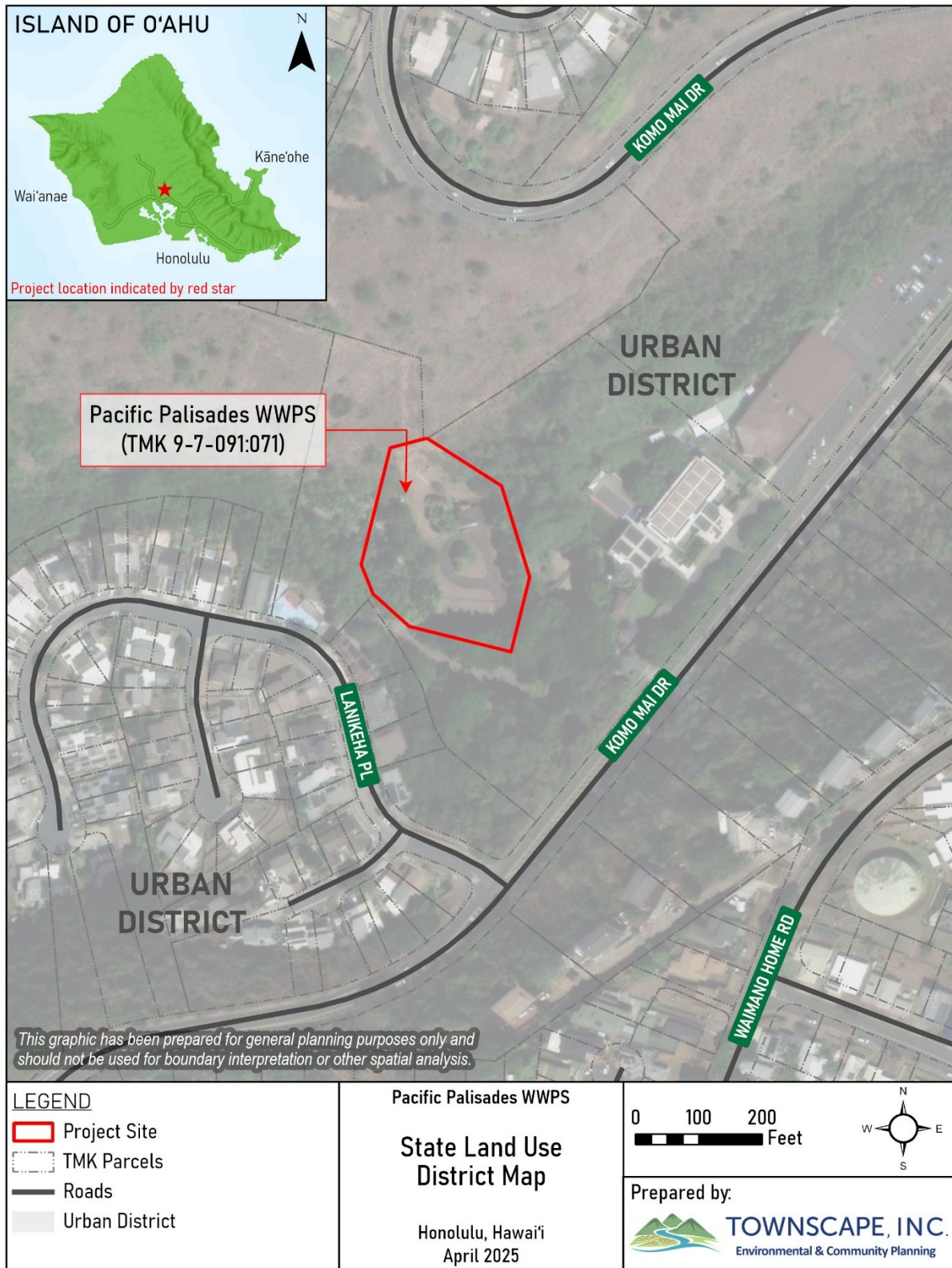


Figure 3 City Zoning Map

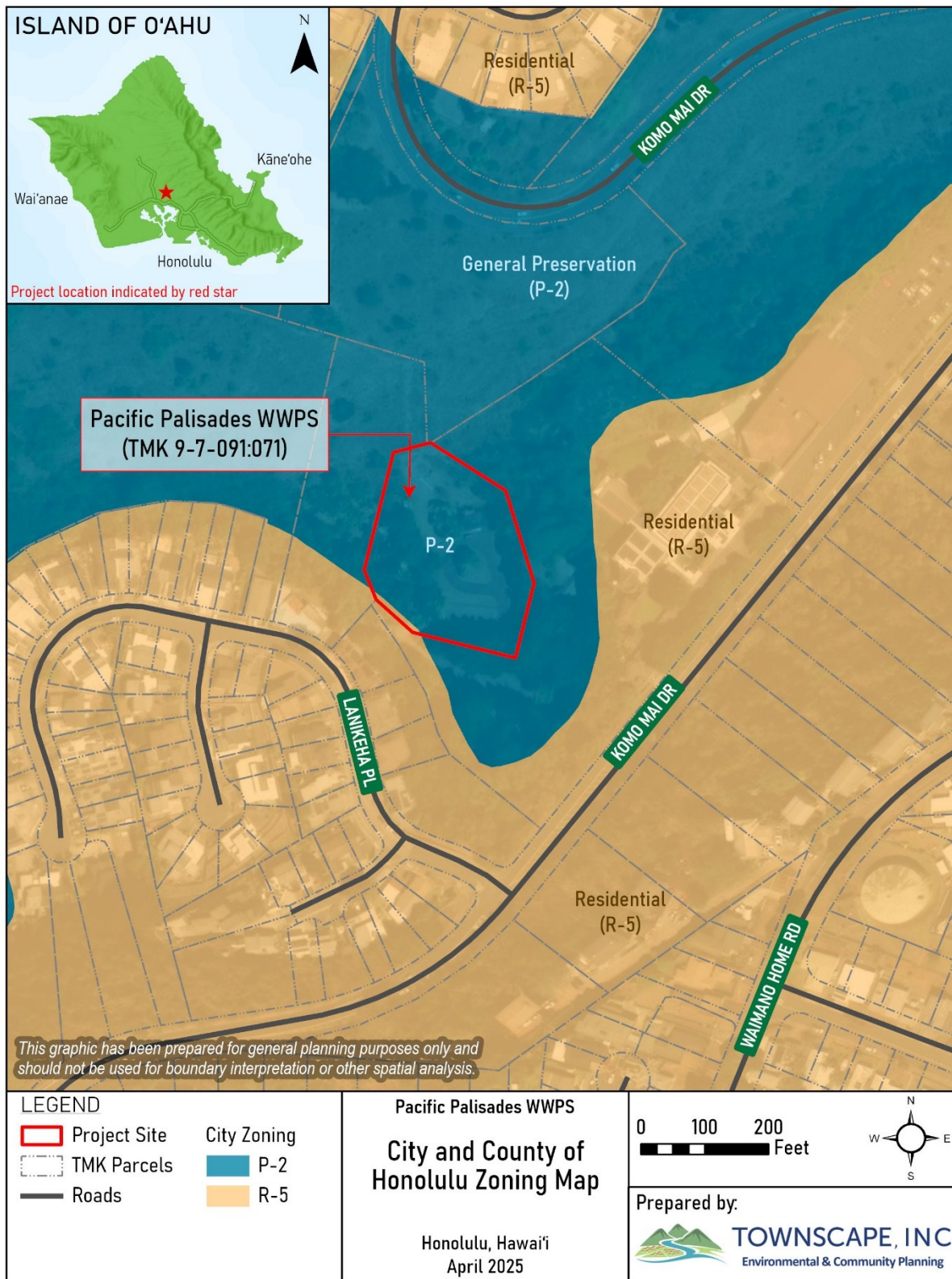


Figure 4 Existing Site Plan (Fukunaga and Associates, Inc., 2012)

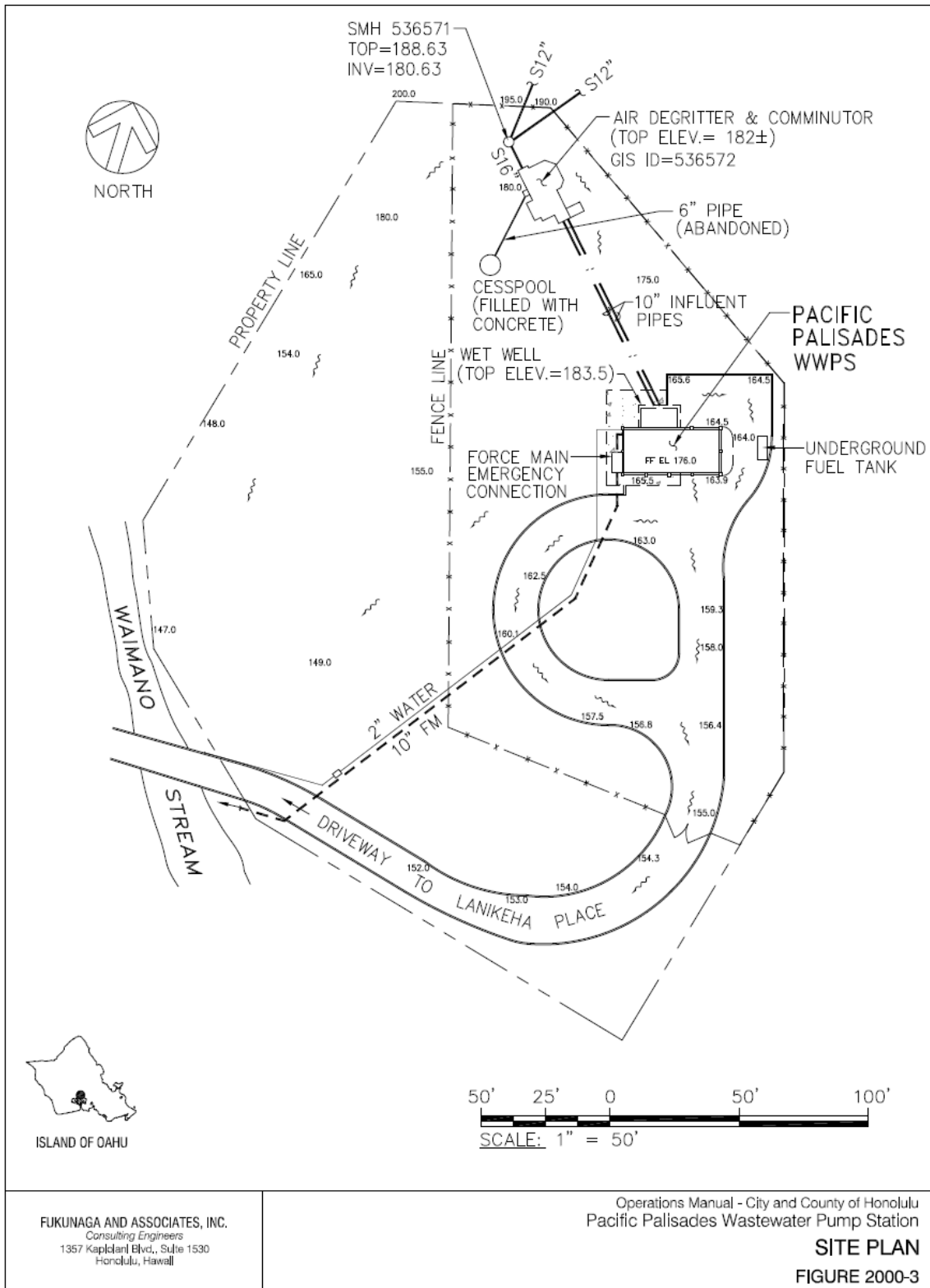


Figure 5 Mechanical Demolition Plan (Okahara and Associates, Inc., 2025)

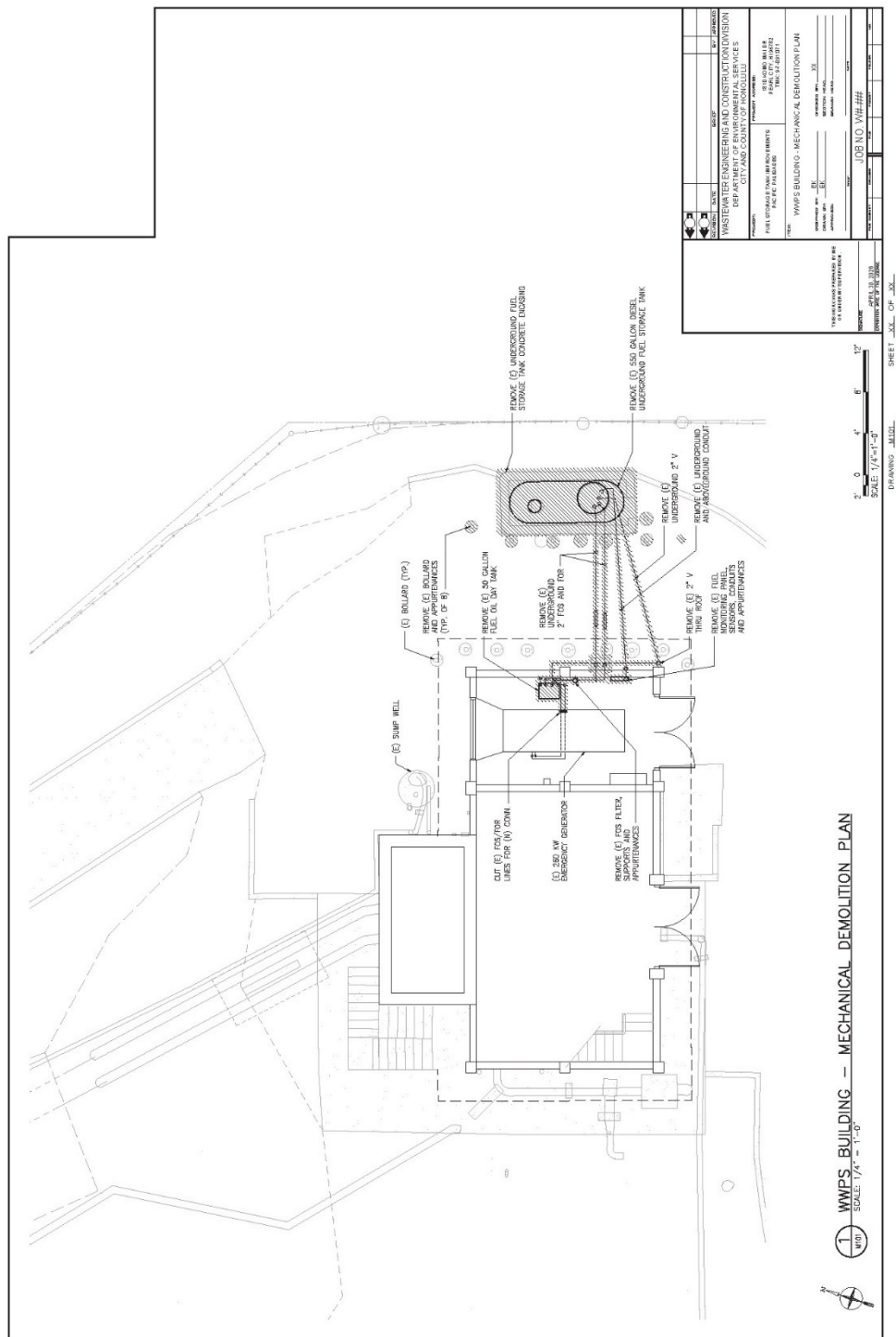




Figure 7 Mechanical Plan (Okahara and Associates, Inc., 2025)

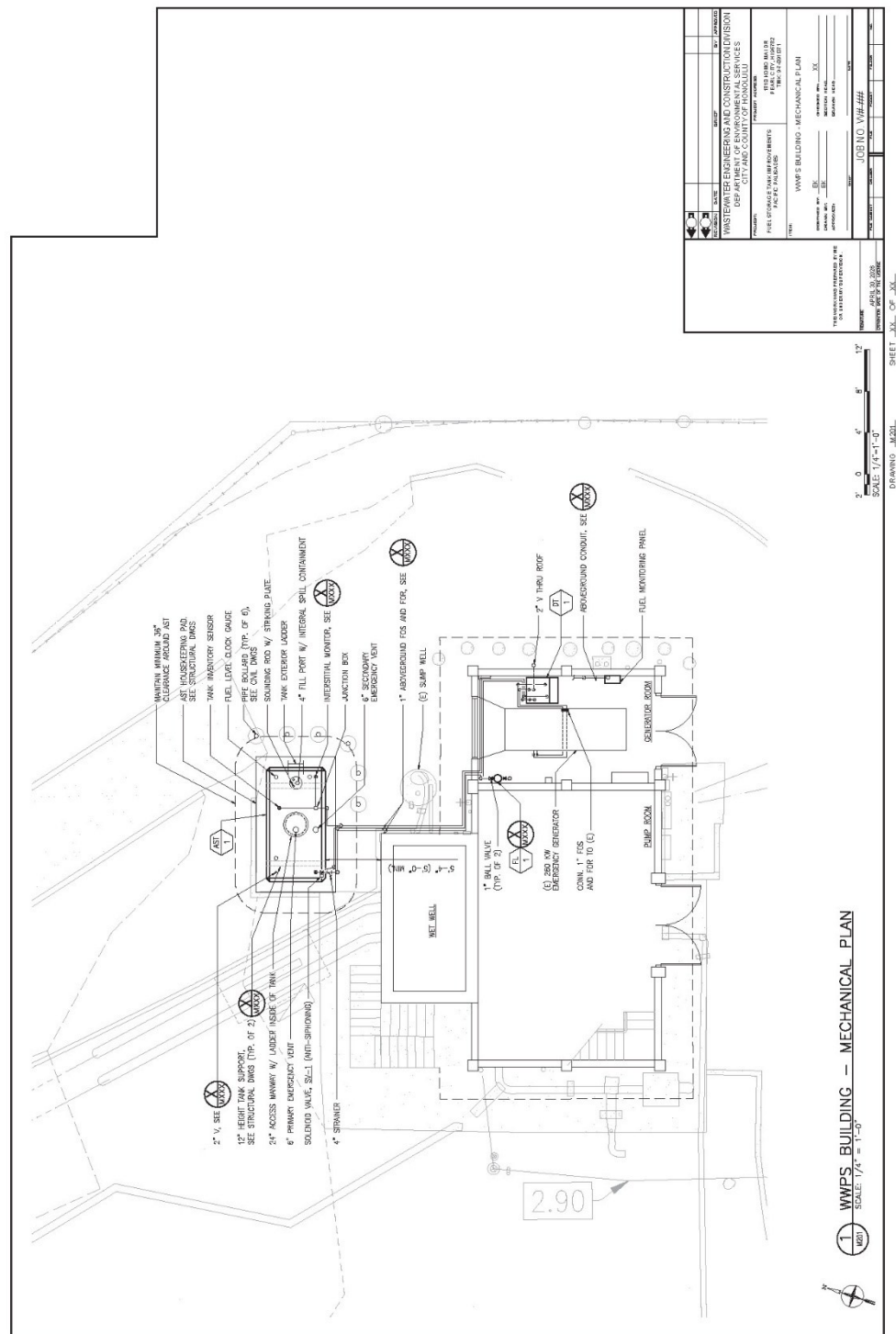


Figure 8 Floor Plan (Okahara and Associates, Inc., 2025)

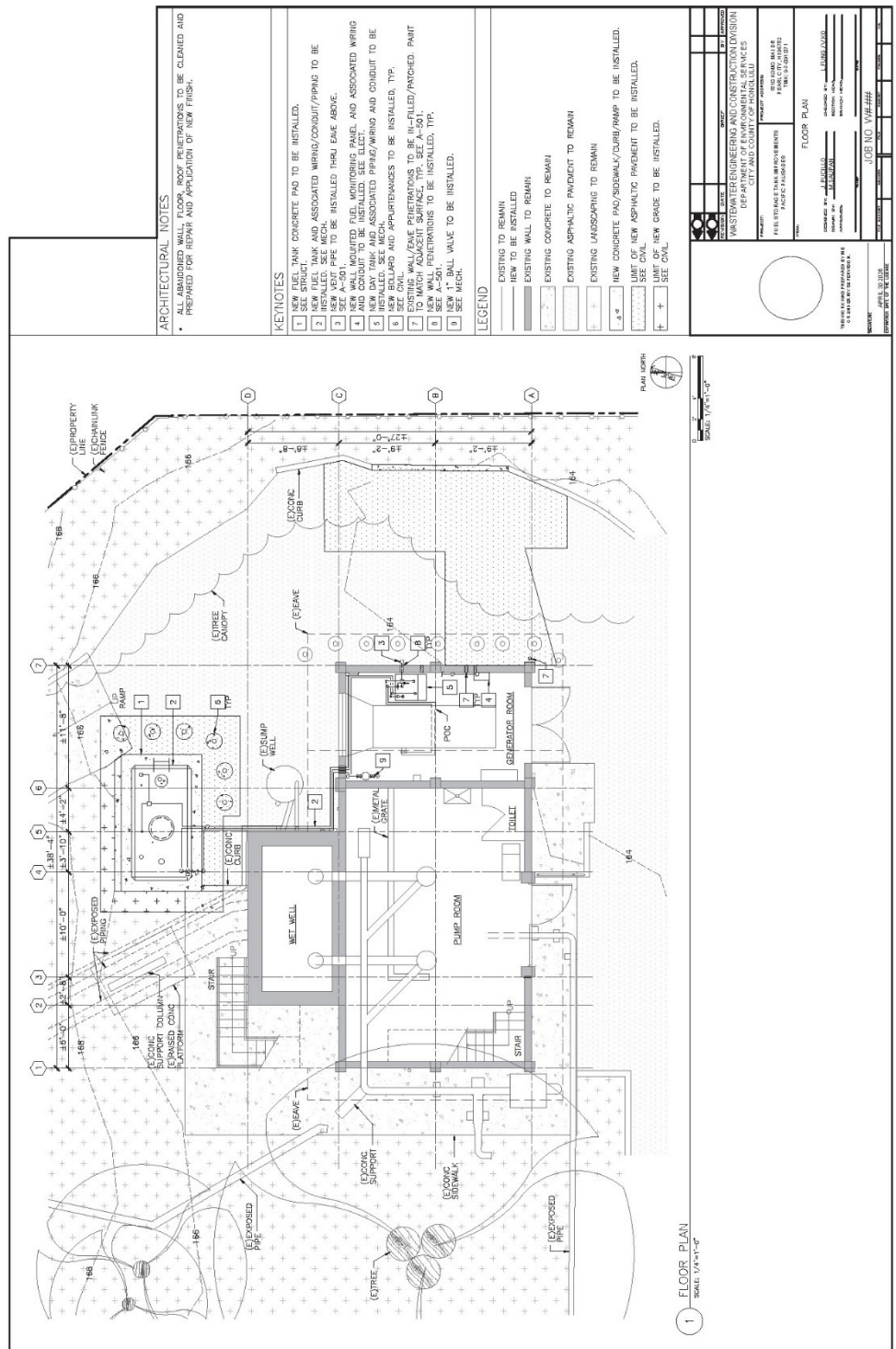
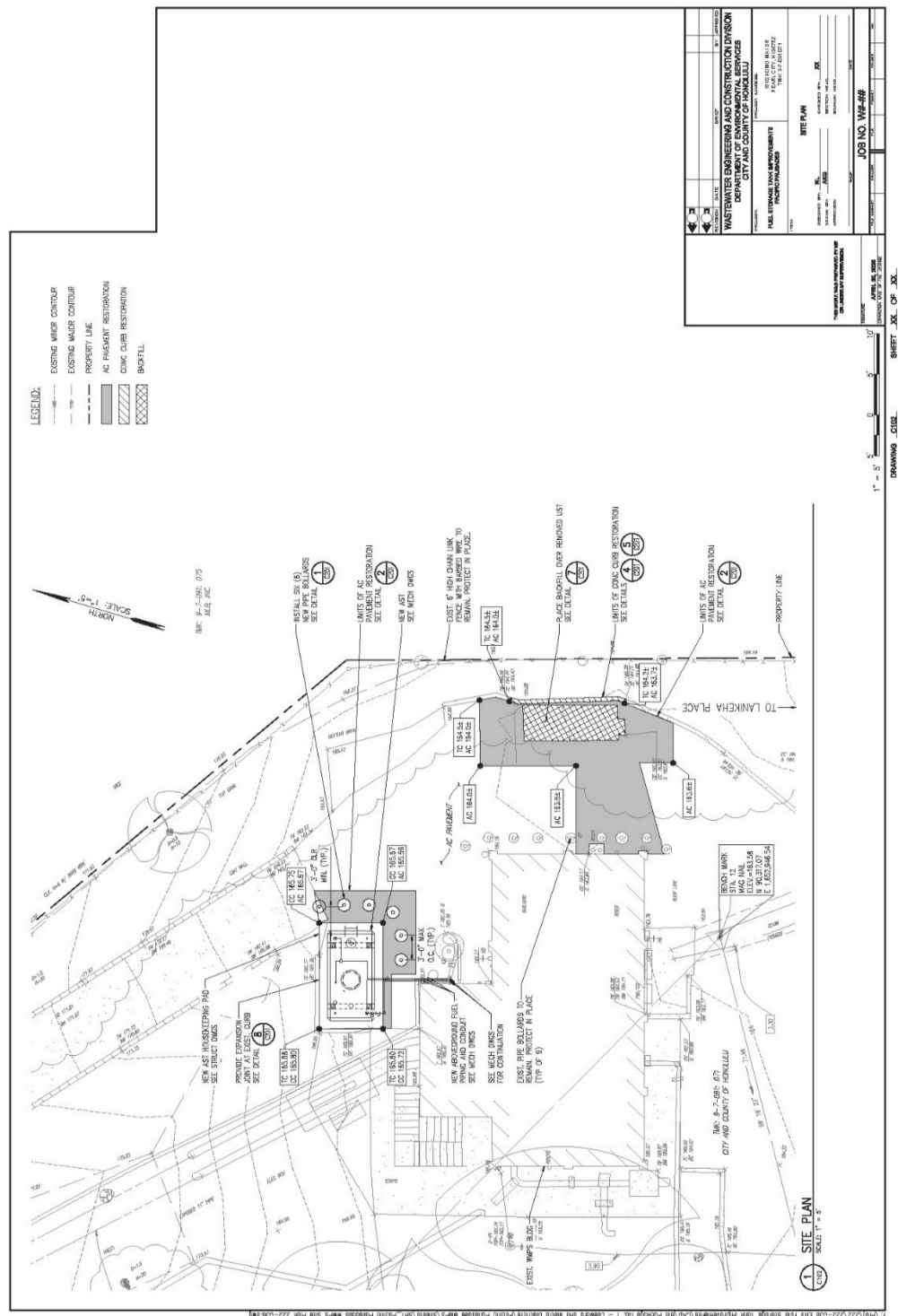


Figure 9 Site Plan with Proposed Actions (Okahara and Associates, Inc., 2025)



1.6. Project Schedule

The project will be executed in multiple phases with other WWPSs, with construction expected to start in April 2027 for 12 months.



View of WWPS and location of the proposed AST to the right of the facility (in the cleared area).

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2. DESCRIPTION OF EXISTING ENVIRONMENT, PROJECT IMPACTS, AND MITIGATION

2.1. Physical Environment

2.1.1. Climate and Rainfall

The climate in the State of Hawai'i is generally characterized by a two-season year: the summer period is warm and dry whereas the winter season is cool and wet. Rainfall distribution across Hawai'i varies greatly according to geographic conditions, elevation, and long-term climatic cycles.

Similarly to the rest of the State of Hawai'i, the project site in Mānana has a mild, semi-tropical climate. Rainfall in Mānana is relatively low as is typical of the leeward side of O'ahu. Most of the rainfall occurs between November to May, although heavy downpours are possible during other months. Average temperatures at the project site range from 65.8 degrees Fahrenheit in February to 82.5 degrees Fahrenheit in August, while the average annual rainfall at the project site is estimated to be 39.4 inches (Giambelluca et al., 2013). Trade winds in the project vicinity are generally from the northeast. During the winter months, the trade winds become less frequent and are replaced by the lighter southwest Kona winds.

Impacts and Mitigation Measures

The proposed project is not anticipated to affect or be significantly affected by the existing climatic conditions of the area and region. No mitigation is proposed.

2.1.2. Topography, Geology and Soils

The Island of O'ahu is composed of the Wai'anae and Ko'olau mountain ranges, which are connected by a central plateau. The older Wai'anae mountain range spans about 20 miles across the western third of O'ahu, while the younger Ko'olau mountain range extends for 37 miles in a northwest to southeast alignment across the eastern two-thirds of the island.

Located on the leeward side of the Ko'olau range, the project site is at approximately 160 feet above mean sea level and is relatively flat. It is surrounded by hilly terrain in upper Pearl City and is located near the intermittent Waimano stream. The general site drainage pattern sheet flows from north to south across the site.

The project area consists of Kawaihapai soil (KIA, clay loam, 0 to 2 percent slopes). Kawaihapai soil is an alluvium formed by igneous rock in humid upland areas (U.S.

Department of Agriculture, Soil Conservation Service, 1972). These soils are moderately permeable and have minimal risk of erosion (Foote et al., 1972).

Figure 10 depicts the soil classifications and topographic map.

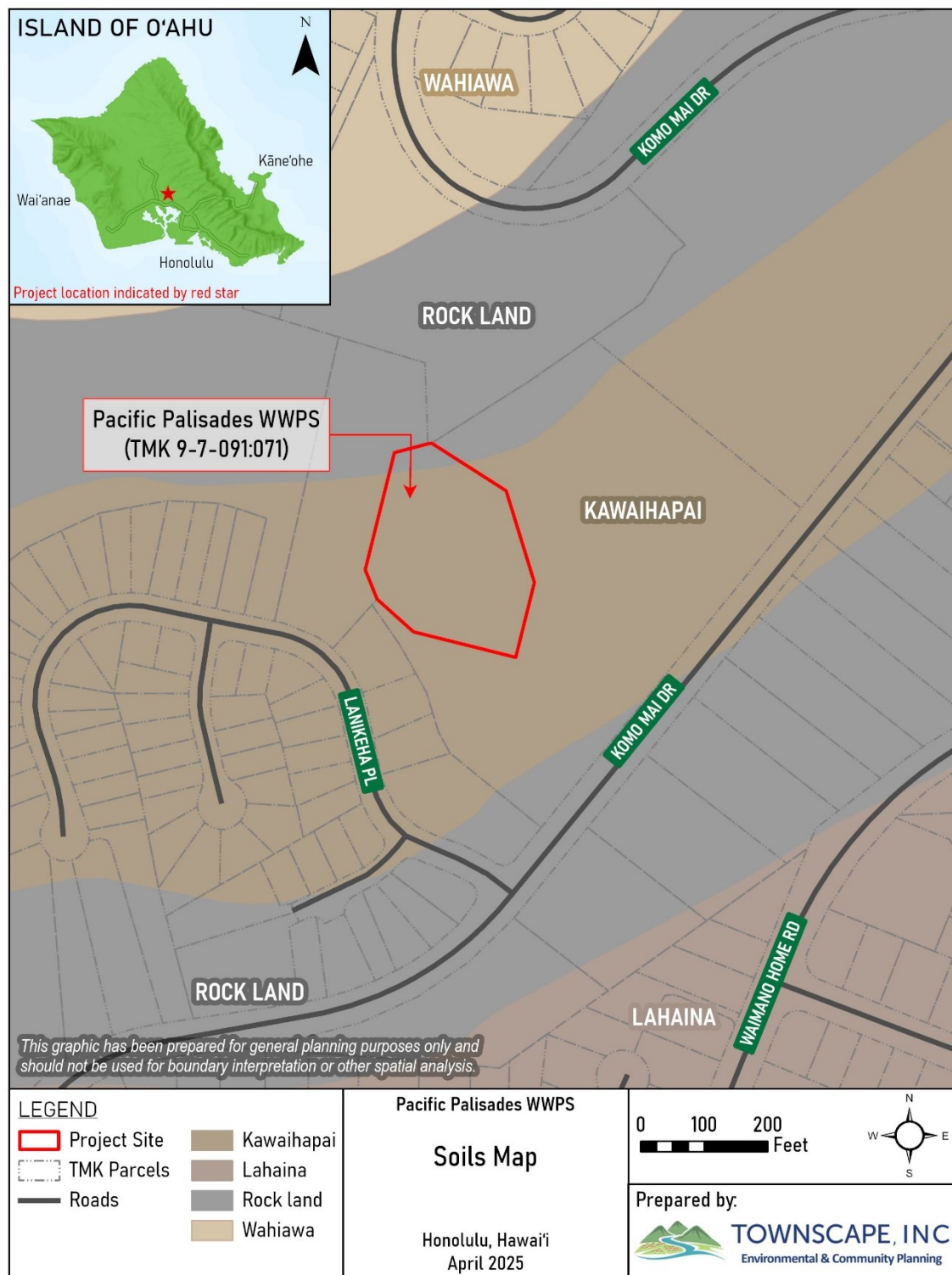
Impacts and Mitigation Measures

Project actions are expected to retain the overall topographic profile of the site. Minimal soil erosion and runoff are expected as the project site is relatively flat, and the soil is relatively stable. The following erosion prevention and sediment control Best Management Practices (BMPs) will be required by the Contractor to prevent any runoff, sediment, soil, and debris potentially resulting from associated construction activities from adversely impacting riparian ecosystems and State waters:

- All exposed disturbed areas are to be permanently stabilized with ground covering such as vegetation, gravel, or pavers.
- Rain gutters, downspouts, and channelized flows must be installed and function as designed.
- In seeded areas, grass or vegetation must cover at least 90 percent of the disturbed soil or must be temporarily stabilized while it is growing.
- Temporary measures, such as sediment barriers, should be removed when permanent measures are in place.
- All paved surfaces must be clean.
- Sediment fences or barriers will be used at the perimeter of all disturbed areas where there is potential for runoff from the project site. Barriers may include gravel bags, sand bags, fiber rolls, silt fences, compost socks, or an equivalent BMP that intercepts runoff.

Additionally, temporary Hard Surface Guards will be installed and maintained downstream of the limits of disturbance prior to demolition and construction.

Figure 10 Soils and Topography



2.1.3. Natural Hazards

Tsunami, Sea Level Rise, and Flooding

The Pacific Palisades WWPS project site is not susceptible to impacts from tsunamis, sea level rise (SLR), and flooding. The project area is not within the Tsunami Evacuation Zone, nor is it within the City's projected SLR exposure area that would be impacted by 5.8 feet of SLR by the year 2100. According to the Department of Land and Natural Resources (DLNR) Flood Hazard Assessment Tool (2025), the project site is located in Flood Zone D, which is designated as an undetermined flood risk by the Federal Emergency Management Agency.

Hurricanes

The project area, like the rest of Hawai'i, is susceptible to hurricanes, particularly during the Pacific hurricane season from June through November. The State of Hawai'i has a 68.5 percent chance of a hurricane of any magnitude occurring within 60 nautical miles in any given year (HI-EMA, 2023). While direct hits are relatively rare, hurricanes can bring strong winds and heavy rainfall, which could impact the region.

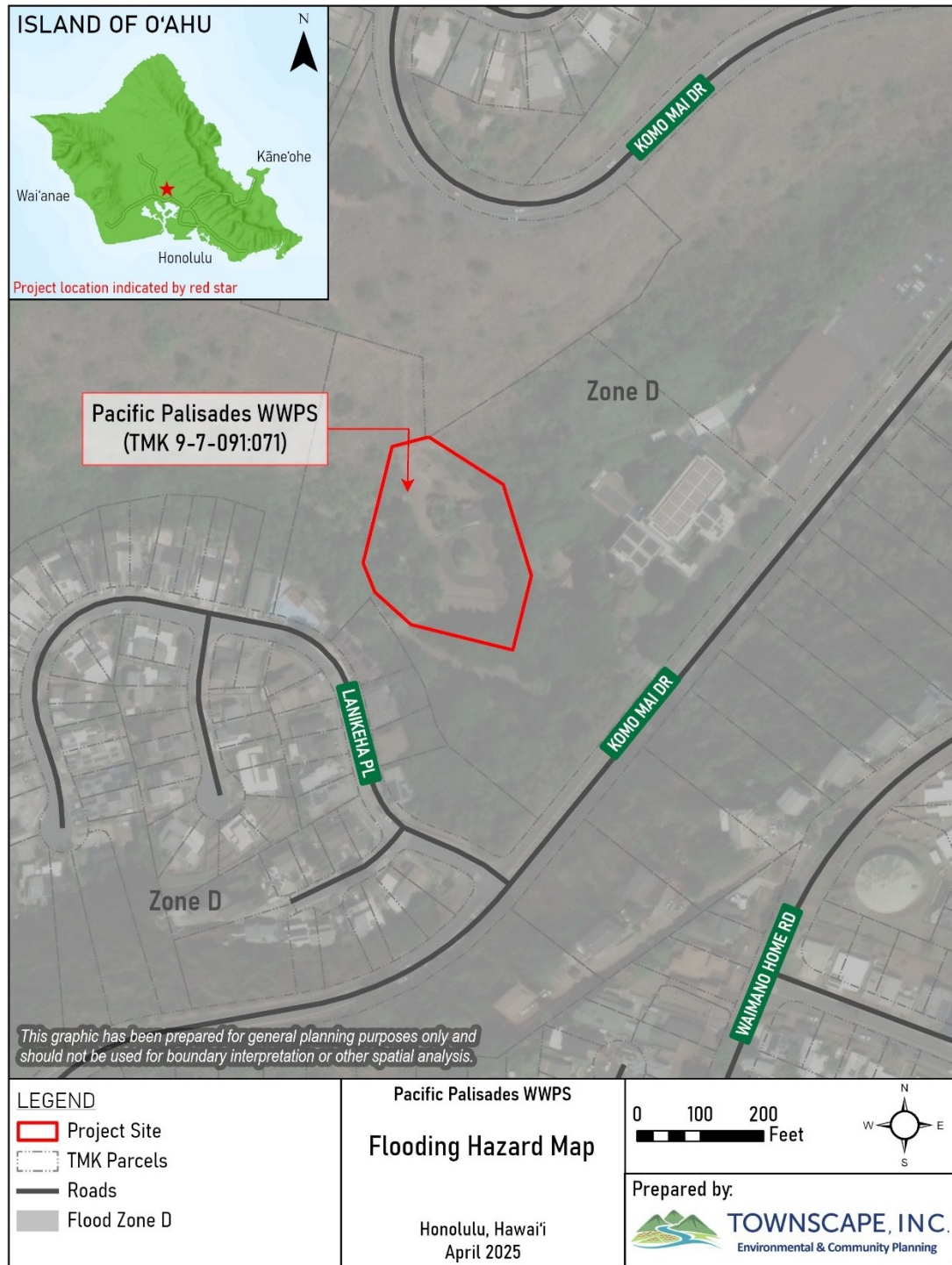
Wildfires

The DLNR Division of Forestry and Wildlife (DOFAW) Fire Management Program classifies the project area as having a high wildfire risk. The likelihood of wildfire occurrence surrounding the project site is high because it is located on the leeward side of the island and is surrounded by dry, alien vegetation, including koa haole, kiawe, and grasses.

Impacts and Mitigation Measures

The threats to people and property from unpredictable natural events will always be present. The likelihood and potential severity of hurricane-related impacts will be no greater than elsewhere in the region, and the planned activities will not exacerbate their associated hazards. The location and planned activities do not introduce any significant factors that would elevate the likelihood of wildfire or flooding in the area. The proposed project is not expected to affect or exacerbate the occurrence of naturally occurring hazards, but DOFAW provides some guidance for wildfire mitigation from an early consultation letter dated May 20, 2025. DOFAW recommends the following mitigation measures for any activities that may increase the risk of starting a wildfire (such as welding in the grass): Wet down the area before starting the task and continuously as needed, have a fire extinguisher on hand, and have a spotter to watch for fire starts.

Figure 11 Flood Zone



2.2. Archaeological, Architectural and Cultural Resources

Archaeologists with Cultural Surveys Hawai'i (CSH) conducted a field inspection on March 20, 2025, which consisted of a pedestrian survey of the Pacific Palisades WWPS and the surrounding area within the perimeter fence. No historic archaeological resources were identified during the survey. The following information is summarized from the Literature Review and Field Inspection report prepared by CSH (see Appendix A) unless otherwise noted.

The Pacific Palisades WWPS project site is situated in the mauka portion of the ahupua'a of Mānana ("to stretch out") in the district of 'Ewa, O'ahu. 'Ewa was once the ruling seat of O'ahu chiefs and was densely populated due to its plentiful freshwater resources and its abundant food supply. The many streams throughout the 'Ewa district irrigated expanses of lo'i kalo (pondfield taro patches) across the lowlands as well as some mauka terraces. The streams then emptied into Pu'uloa (Long Hill), today known as Pearl Harbor. The freshwater and nutrients entering Pu'uloa made it an ideal place for constructing productive fishponds. Countless inland and ocean fishponds were present across Pu'uloa prior to Western contact and up through the Hawaiian Kingdom period. Pu'uloa had an abundance of shellfish, including the famous i'a hāmau leo (silent-voiced fish, or oyster), which was an important food source. Additionally, the pristine waters of Pu'uloa was where vast schools of mullet would begin their circuit around the island each year, known as the 'anae holo. Thus, there were many resources and sites of cultural and historical significance surrounding the project area.

While most traditional habitation occurred within 400 meters of the shores of Pu'uloa, evidence of several agricultural features were identified surrounding the Pacific Palisades WWPS project vicinity. This includes an 'okipu'u (O'ahu term for a forest clearing) approximately 1.6 kilometers northeast of the project site that was used to cultivate fruit trees and crops such as breadfruit and banana (Shideler and Hammatt, 2025; Pukui and Elbert, 1986). The project site is located near the Waimano ("many waters") stream and 600 meters northeast of its confluence with the Waiawa ("bitter water" or "milkfish water") stream (Shideler and Hammatt, 2025; Pukui and Elbert, 1986). Both the Waimano and Waiawa streams were traditionally responsible for irrigating terraces of lo'i east of present-day Pearl City (Sterling and Summers, 1978).

In the late 19th century, land use in 'Ewa transitioned to industrial sugar plantation agriculture. Plantations extended from the ahupua'a of 'Aiea on the east, to the Mānana and Waiawa streams on the west. The Pacific Palisades WWPS project site is situated within these former plantation lands (Shideler and Hammatt, 2025). In 1890, Mānana rapidly began to urbanize. The transformation of the traditional

landscape was accompanied by the erasure of the original places names for the Mānana area. A contest was initiated by Anglo businessmen James Campbell and Benjamin Franklin Dillingham to propose a new name for Mānana, in which the name “Pearl City” was selected as the winner.

Only one previous archaeological study was conducted within 500 meters of the project site, in which an agricultural complex surrounding the Waimano stream was identified by Griffin and Yent (1978). However, no archaeological findings were identified within the project site.

Impacts and Mitigation Measures

No impacts to existing archaeological, architectural, or cultural resources are anticipated. The installation of the AST and removal of the existing tank will not require expansion of the existing site nor disturbance to the land beyond what has already been displaced. Functionally, the new installation will have generally the same use and properties.

In the event that any unexpected iwi or other historical remains are uncovered during the various phases of construction (e.g., excavation and trenching), the Contractor will be required to halt construction activities and to immediately notify the State Historic Preservation Division (SHPD) of the discovery. The Contractor will prevent the disturbance or taking of any discovered archaeological, historic, or cultural resources to the extent possible by instituting the described mitigation measures (i.e., halt construction and immediately notify SHPD) and enforcing their implementation by its contractors.

2.3. Floral and Faunal Resources

An early consultation letter from DLNR DOFAW on May 20, 2025, states that the following State-listed species may occur within the project area: 1) the ‘ōpe‘ape‘a, or Hawaiian hoary bat (*Lasiurus semotus*), and 2) the pueo, or Hawaiian short-eared owl (*Asio flammeus sandwichensis*).

According to the U.S. Fish and Wildlife Service’s map for the Information for Planning and Consultation (2025), several species are identified as potentially occurring in the general vicinity or passing through the area, including:

- Band-rumped storm petrel – *Hydrobates castro*
- Bristle-thighed curlew – *Numenius tahitiensis*
- Hawaiian common gallinule – *Gallinula galeata sandvicensis*

- Hawaiian hoary bat – *Lasiurus cinereus semotus*
- Hawaiian petrel – *Pterodroma sandwichensis*
- Hawaiian coot (‘Alae ke‘oke‘o) – *Fulica alai*
- Hawaiian duck (Koloa maoli) – *Anas wyvilliana*
- Hawaiian stilt (Ae‘o) – *Himantopus mexicanus knudseni*
- O‘ahu ‘amakihi – *Chlorodrepanis flava*
- Wandering tattler – *Tringa incana*

However, there are no wetlands or surface water features within or adjacent to the project area. As a result, species associated with wetland or freshwater habitats (such as Hawaiian coot, duck, and stilt) are not likely to be found on site.

The following flora species have been identified for this region:

- ‘Aiea – *Nothocestrum latifolium*
- ‘Akoko – *Euphorbia celastroides* var. *kaenana*
- ‘Akoko – *Euphorbia kuwaleana*
- Carter’s panicgrass – *Panicum fauriei* var. *carteri*
- ‘Ena‘ena – *Pseudognaphalium sandwicensium* var. *molokaiense*
- Hawai‘i scaleseed – *Spermolepis hawaiiensis*
- Kāmanomano – *Cenchrus agrimonioides*
- Ihi – *Portulaca villosa*
- ‘Ōhai – *Sesbania tomentosa*

Impacts and Mitigation Measures

Construction will occur entirely within the existing City property on land that has been previously disturbed and where no native plants are present. Vegetation removal, if any, will be kept to a minimum, and the project is not expected to have a significant impact on flora and fauna in the area.

The following guidance from the U.S. Fish and Wildlife Service (2025) and DOFAW (2025) is provided to minimize impacts to the following species:

Hawaiian hoary bat

- Woody plants greater than 15 feet tall should not be disturbed, removed, or trimmed during the bat birthing and pup rearing season (June 1 through September 15).

- Barbed wire should not be used in any construction as bats can become ensnared and killed by such fencing material during flight.

Pueo

- Before any potentially disturbing activities like clearing vegetation, or ground-based disturbance especially, DOFAW recommends a qualified biologist conduct surveys during crepuscular hours for 2 to 3 nights before construction is to start. If any breeding displays are observed, there is likely to be a nearby nest on the ground.
- If pueo nests are detected in the area, a buffer zone should be established in which no activity occurs within a minimum buffer distance of 100 meters until the nesting cycle is complete, and the chicks are capable of flight.
- O'ahu Branch DOFAW staff should be notified at (808) 973-9778 of any nests or adult displayed breeding behavior.

Seabirds

- Prior to initiating construction and before restarting construction after a delay, qualified personnel with seabird biology experience will conduct surveys of nearby areas for signs of active nesting or brooding. If a nest or brood is found, a 100-foot buffer around the area will be created.
- For nighttime work that might be required, use fully shielded lights angled downward to reduce the risk of harm to native seabirds.
- Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season (September 15 through December 15) when young seabirds make their maiden voyage to sea.
- If nighttime construction is required, a qualified biologist should be present at the project site to monitor and assess the risk of seabirds being attracted or grounded due to the lighting.
- Permanent lighting also poses a risk of seabird attraction and should be minimized or eliminated. If needed, permanent lighting should be shielded or angled downward.

Invasive Species

- DOFAW recommends minimizing movement of plant or soil material between worksites to prevent the transport of fungal pathogens, vertebrate and invertebrate pests, and invasive plant species. Consultation is recommended with the O'ahu Invasive Species Committee to help design and plan the project.

- DOFAW advises that all work equipment and personal items—including clothing and footwear—should be cleaned of excess soil and debris to minimize the risk of spreading invasive species such as fungal pathogens, pests, and alien plant propagules.
- Avoid the import of soil or plant material from off-island that may contain fungi and other pathogens. Consultation is recommended with the Hawai'i Interagency Biosecurity Plan in the construction process.
- To prevent infestation of the Coconut Rhinoceros Beetle (CRB), the movement of CRB-host material, including a) entire dead trees; b) mulch, compost, trimmings, fruit and vegetative scraps; and c) decaying stumps, is prohibited under the Hawai'i Department of Agriculture's Plant Quarantine Interim Rule 22-1. In addition, host plants for CRB include the live palm plants of the following genera: *Washingtonia*, *Livistona*, and *Pritchardia* (all commonly known as fan palms), *Cocos* (coconut palms), *Phoenix* (date palms), and *Roystonea* (royal palms), all of which may contain CRB infestations.

In addition, all on-site workers should be trained on recognizing State-listed waterbirds and seabirds. Should any State-listed waterbirds or seabirds be observed during construction operations, all activities within a 100-foot radius shall stop until the birds depart the area on their own.

2.4. Environmental Quality

2.4.1. Visual Resources

The project site is surrounded by forested and open space near a residential neighborhood. However, the Pacific Palisades WWPS is accessed through a long driveway surrounded by vegetation and is not visible from the street.

Impacts and Mitigation Measures

No significant impact on the area's visual resources is anticipated. The project site is fenced and is not visible from the street. Therefore, no viewsheds would be affected by the proposed project.

2.4.2. Acoustic Characteristics

The project site is located near a relatively quiet residential neighborhood. The nearby neighborhood is characterized by roads with low speed limits and several cul-de-sacs.

Impacts and Mitigation Measures

Temporary noise from the project is expected to be intermittent and unavoidable due to the presence of construction vehicles, heavy equipment, and excavation activities. Ambient noise levels are expected to briefly increase during construction, primarily from work vehicles and machinery.

To mitigate noise impacts, construction work will be scheduled during daytime hours, thereby avoiding excessive noise during the nighttime. The Contractor will be required to follow BMPs to control noise levels at all times. Temporary noise reduction measures during construction may include, but are not limited to, the use of sound walls, sound blankets and curtains, equipment mufflers and low-noise generators.

2.4.3. Air Quality

The air quality at the WWPS is generally consistent with ambient conditions typical of upland areas of the Ko'olau mountain range, where prevailing trade winds typically help disperse odors and maintain good air circulation. Emissions from nearby traffic along Komo Mai Drive may contribute to localized air pollutants.

Impacts and Mitigation Measures

No significant impacts to air quality nor measurable adverse effect on climatic conditions is anticipated from the project. Ambient air quality may be temporarily affected by construction-related vehicles, equipment, and activities that would generate fugitive dust and emissions. To prevent air pollution and dust from the demolition of structures, the Contractor shall sprinkle exposed soils with water to maintain moistness.

2.4.4. Hazardous Materials

The proposed AST will store up to 1,000 gallons of diesel fuel for the WWPS facility operations. Stored fuel is regulated under National Fire Protection Association (NFPA) 30 (Flammable and Combustible Liquids Code), the Honolulu Fire Code, Revised Ordinances of Honolulu (ROH)

Chapter 66, and Clean Water Act Spill Prevention, Control and Counter Measures or SPCC rule (40 CFR 112).

Impacts and Mitigation Measures

Secondary containment with interstitial monitoring will be provided in compliance with regulatory requirements. A minimum of 36 inches of clearance will be maintained around the AST.

The proposed fuel storage tank will be designed, installed, and maintained in accordance with all applicable federal, state, and county regulations. With appropriate containment and emergency measures in place, the project is not expected to result in significant adverse impacts related to hazardous materials. The upgrades of the storage tank system shall be in strict accordance with the guidelines and requirements set forth in the Federal Register 40, CFR PART 280 and the American Petroleum Institute recommended practice 2015 "safe entry and cleaning of petroleum storage tanks" and shall adhere to all required safety precautions.

If there are any fuel spillages or existing leaks that result from construction, the Contractor shall report it to the Hazard Evaluation and Emergency Response Unit of the Department of Health.

Six steel pipe bollards will be installed around the AST to protect it from accidental vehicle collisions to reduce the risk of spills, leaks, or structural damage. The bollards will be constructed of Schedule 40 steel pipe filled with 2,500 psi concrete to provide structural strength and impact resistance and will be painted in Occupational Safety and Health Administration approved safety yellow. Pipe bollards will be sized and spaced with proper clearances to meet the minimum NFPA requirements, including:

- Three feet minimum horizontal clearance between the edge of the AST and the outer edge of the pipe bollard.
- Three feet maximum spacing, on-center, between adjacent pipe bollards.
- Three feet minimum height of bollard, as measured from finish grade to the top of the bollard.

The day tank and AST will include alarms for the following:

- Fuel level capacity at high level of 95%
- Fuel level capacity at low level of 25%

- Fuel level capacity at low-low level of 10%
- Fuel level into double wall tank.

2.5. Public Infrastructure & Services

2.5.1. Site Access, Circulation and Traffic

Vehicular access to the project site is from a driveway on Lanikeha Place, a residential street. Access to the site is restricted for security and operational purposes. The parcel is fully enclosed within a chain-link fence and secured by a locked gate. Entry to the WWPS property is limited to authorized City personnel and contractors. On-site circulation is minimal and consists of a small, paved area extending from the gate to the front of the facility, which is sufficient for maneuvering maintenance vehicles and equipment. Due to the nature of the facility, traffic generation is minimal and predominately involves City staff conducting inspections, routine maintenance, and emergency responses.

Impacts and Mitigation Measures

Construction vehicles hauling materials and workers to and from the WWPS may contribute to traffic volume on Komo Mai Drive, and it is recommended that construction deliveries be scheduled to avoid peak hours. Temporary impacts to localized traffic on Lanikeha Place may occur during construction of the proposed project, but the impacts are anticipated to be minimal. The Honolulu Police Department (HPD) provides impact and mitigation guidance in an early consultation letter dated April 25, 2025. The HPD recommends that all necessary lights, signs, barricades, and other safety equipment be installed and maintained by the contractor during the construction phase of the project. Additionally, adequate notification should be made to area businesses and residents prior to possible road closures, as any impact to pedestrian and/or vehicular traffic or construction-related debris could lead to complaints.

2.5.2. Potable Water and Wastewater

Water service is supplied by the Honolulu Board of Water Supply. It provides potable water for the facility, which is used for a sink and restroom, hose connections, seal water system, and pneumatic water system (Fukunaga and Associates, Inc., 2012). The water system servicing the WWPS is located on the west side of the site, outside of the anticipated limits of disturbance.

As stated earlier, wastewater from the Pacific Palisades WWPS is conveyed to the Pearl City WWPS via a 10-inch force main that runs along City streets.

Impacts and Mitigation Measures

In an early consultation letter dated April 28, 2025, the Board of Water Supply indicates that the existing water system is adequate to accommodate the proposed development. Final decision on the availability of water will be confirmed when the building permit application is submitted for approval. Where applicable, water-efficient fixtures will be installed and water-efficient practices will be implemented to not put an undue demand on the freshwater resources of the area. Further, the BWS requests that construction schedules be coordinated with them to minimize impact to the water service system.

The proposed upgrades will not alter the capacity or operations of the WWPS but will improve the reliability of service so the community can expect continued reliable wastewater services, which support the economic and social welfare of the communities served by the WWPS. Since no significant impacts on the utilities are anticipated, no additional mitigation is proposed.

2.5.3. Power and Communications

HECO provides power to the pump station via underground facilities. A pad-mounted transformer that supplies power to the site is southeast of the property. It is owned and maintained by HECO. The HECO meter connecting to the property is located on the south wall of the ground floor pump room (Fukunaga and Associates, Inc., 2012).

The emergency power system is used to provide backup power when normal HECO service fails. The system consists of two major components: the emergency generator and the automatic transfer controller.

Communication systems consist of the following: Telemetry and SCADA, and telephone service. The telemetry and SCADA system provides local and remote monitoring of the facility, 24 hours a day. The facility is remotely monitored by SCADA at the Honouliuli and Sand Island WWTPs. Telephone service is used for normal telephone communications and as a mechanism for telemetry to SCADA (Fukunaga and Associates, Inc., 2012).

Impacts and Mitigation Measures

No significant adverse impacts to power and communications are anticipated. However, access to HECO facilities within or adjacent to the site will be maintained at all times for safe operation, maintenance, and emergency response.

The new AST and most of the associated fuel piping can be installed prior to removing the existing UST. However, the existing day tank must be removed before the new day tank can be installed. When the backup power system must be taken offline, a temporary generator will be used to provide backup power to the WWPS. The temporary generator will be appropriately sized to support facility operations during the outage period.

2.5.4. Emergency Service Facilities

Law enforcement services are provided by the HPD. The nearest police station is the Pearl City Police Station, located at 1100 Waimano Home Road, approximately 1.7 miles from the project site.

The Honolulu Fire Department (HFD) provides fire protection and first responder emergency services. The nearest fire station is the Waiau Fire Station 38, located at 98-1109 Komo Mai Drive, approximately 1.9 miles from the project site. Nearly as close is the Pearl City Fire Station 20, located at 880 1st Street, approximately 2.2 miles from the project site.

The nearest health center is the Queen's Health Care Center 'Aiea-Pearl City, located at 98-1247 Ka'ahumanu Street. It is approximately 2.6 miles from the project site.

Impacts and Mitigation Measures

No significant adverse impacts to police, fire, or medical services are anticipated to occur from the proposed project at the Pacific Palisades WWPS. A letter from the HFD dated April 30, 2025 requests that all applicable requirements of the ROH Chapter 20 be in effect at the time the building permit for the project is issued.

2.5.5. Recreational Resources

There are no public parks, hiking trails, or other recreational spaces surrounding the project site.

Impacts and Mitigation Measures

Due to the lack of recreational resources in the area, no mitigation measures are proposed.

2.6. Socio-Economic Characteristics

The project site is situated on the mauka portion of Pearl City on the south shore of O‘ahu, within the Pearl City Neighborhood Area. This region is predominately home to Asian (50.5%), White (12.3%) and Native Hawaiian/Pacific Islander (7.5%) populations (Department of Planning and Permitting, 2023). The Pearl City area has a resident population is 45,295 people with 14,945 total households, and an average household size of 2.98 individuals. The median household income is \$114,682 (U.S. Census Bureau, 2020).

Impacts and Mitigation Measures

The project will involve construction activities that will create short-term jobs in design and construction. The project will not affect population levels or housing. The proposed upgrades will not alter the capacity or operations of the WWPS. The community can expect continued reliable wastewater services, which support the economic and social welfare of the community served by the WWPS.

3. RELATIONSHIP TO PLANS, POLICIES, AND CONTROLS

3.1. Hawai'i State Plan

The Hawai'i State Plan, HRS Chapter 226, outlines broad goals, policies, and objectives to serve as guidelines for the future growth and development of the State. It also provides a basis for determining priorities, allocating limited resources, and improving coordination of State and County plans, policies, programs, projects, and regulatory activities. The Hawai'i State Plan establishes a set of themes, goals, objectives, and policies that are meant to guide the State's long-range growth and development activities. Applicable sections of HRS Chapter 226 to the proposed project are discussed below.

§226-13 Objectives and policies for the physical environment—land, air, and water quality.

Objective 1. Maintenance and pursuit of improved quality in Hawai'i's land, air, and water resources.

Policy 2. Promote the proper management of Hawai'i's land and water resources.

Policy 3. Promote effective measures to achieve desired quality in Hawai'i's surface, ground, and coastal waters.

Policy 5. Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.

§226-14 Objective and policies for facility systems—in general.

Policy 1. Accommodate the needs of Hawai'i's people through coordination of facility systems and capital improvement priorities in consonance with state and county plans.

§226-15 Objectives and policies for facility systems—solid and liquid wastes.

Objective 1. Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.

Objective 2. Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.

Discussion:

The proposed project complies with the elements of the Hawai'i State Plan by providing essential upgrades to critical public infrastructure and enhancing its resiliency against future disruptions or disasters. By upgrading the fuel tank storage infrastructure to reduce the risk of fuel leaks into the environment, the project supports the State's objectives to maintain sewage facilities that meet public health and sanitation standards.

3.2. State Land Use District

The State Land Use Law (HRS Chapter 205) is intended to preserve, protect, and encourage the development of lands in the State for uses which are best suited to the public health and welfare for Hawai'i's people. All lands in the State are classified into four land use districts by the State of Hawai'i Land Use Commission: Urban, Rural, Agricultural, and Conservation.

The project site is entirely located within the Urban District, which is regulated by County zoning (see Section 3.8 City and County of Honolulu LUO). The proposed project is a permissible public use and structure within the Urban District, which has residential neighborhoods, commercial enterprises, industrial development, and community facilities such as public buildings.

3.3. State Coastal Zone Management Program

In 1977, Hawai'i enacted HRS Chapter 205A, Hawai'i Coastal Zone Management Program, to carry out the state's coastal zone management policies and regulations. The program was designed to coordinate federal, state, and county agency efforts in the comprehensive management of Hawai'i's coastal resources. It is administered by the State of Hawai'i, Office of Planning and Sustainable Development, while the four individual counties are responsible for local implementation through the Special Management Area permit and Shoreline Setback Variance.

The objective of the act is to protect, preserve, and restore recreational, historic, and scenic resources as well as implement the State's ocean resources management plan and protect coastal ecosystems.

The objectives and policies from HRS §205A-2, along with a discussion of how the project conforms to these objectives and policies, are provided below.

Recreational Resources

Objective: Provide coastal recreational opportunities accessible to the public.

Policies:

- (A) Improve coordination and funding of coastal recreational planning and management; and
- (B) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:
 - (i) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;
 - (ii) Requiring restoration of coastal resources having significant recreational and ecosystem value including, but not limited to, coral reefs, surfing sites, fishponds, sand beaches, and coastal dune, when these resources will be unavoidably damaged by development; or requiring monetary compensation to the State for recreation when restoration is not feasible or desirable;
 - (iii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;
 - (iv) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;
 - (v) Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;
 - (vi) Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters;
 - (vii) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and
 - (viii) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land

and natural resources, and county authorities; and crediting that dedication against the requirements of section 46-6.

Discussion:

Access to shoreline recreation will not be affected as the project site is located several miles mauka. Proposed work will occur in a relatively flat area, and erosion and sediment BMPs will be in place.

Historic Resources

Objective: Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies:

- (A) Identify and analyze significant archaeological resources;
- (B) Maximize information retention through preservation of remains and artifacts or salvage operations; and
- (C) Support state goals for protection, restoration, interpretation, and display of historic resources.

Discussion:

There are no known cultural or historic resources within the site boundary, which has been previously graded, but recommendations by the SHPD will be followed to protect cultural resources, should any be discovered during construction.

Scenic and Open Space Resources

Objective: Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

- (A) Identify valued scenic resources in the coastal zone management area;
- (B) Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;

- (C) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and
- (D) Encourage those developments that are not coastal dependent to locate in inland areas.

Discussion:

No adverse visual impacts are anticipated. The proposed project involves replacing an existing underground fuel storage tank with an aboveground fuel storage tank, which will be located behind the existing building, furthest from the street. However, the entire WWPS facility is surrounded by a forested area and is not visible from the residential street. The existing houses and forested area block the WWPS facility from the public view. Site grading will also be minimized to preserve the natural contours of the land.

The project preserves the existing vegetation and open space by limiting the development footprint to a previously disturbed area, thereby avoiding new encroachment into pristine open space. The proposed location of the AST is determined by the presence of the existing WWPS infrastructure and the critical role it plays in ensuring the continued operation of the WWPS during emergencies.

Coastal Ecosystems

Objective: Protect valuable coastal ecosystems, including reefs, beaches, and coastal dunes, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

- (A) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;
- (B) Improve the technical basis for natural resource management;
- (C) Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes;
- (D) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and
- (E) Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the

development and implementation of point and nonpoint source water pollution control measures.

Discussion:

This project replaces outdated infrastructure with a new fuel storage system that complies with current state regulations. The proposed AST will provide improved monitoring, maintenance and containment capabilities, thereby reducing the risk of fuel leaks that could impact coastal waters and marine ecosystems. The AST will be equipped with built-in secondary containment systems to capture any potential spills and minimize the risk of environmental contamination.

In addition, the project enhances accessibility and monitoring capability, which supports a more proactive and data-driven approach to resource management. The AST will include leak detection sensors and meet the latest standards for fuel storage safety.

Economic Uses

Objective: Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

- (A) Concentrate coastal dependent development in appropriate areas;
- (B) Ensure that coastal dependent development and coastal related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts in the coastal zone management area; and
- (C) Direct the location and expansion of coastal development to areas designated and used for that development and permit reasonable long-term growth at those areas, and permit coastal dependent development outside of designated areas when:
 - (i) Use of designated locations is not feasible;
 - (ii) Adverse environmental effects and risks from coastal hazards are minimized; and
 - (iii) The development is important to the State's economy.

Discussion:

The proposed project supports a public utility facility that is essential for conveying wastewater from residential lots in Pacific Palisades to the Honouliuli WWTP. By upgrading the infrastructure, the project ensures continued operation during power outages, thus supporting public health, safety, and economic stability.

Coastal Hazards

Objective: Reduce hazards to life and property from coastal hazards.

Policies:

- (A) Develop and communicate adequate information about the risks of coastal hazards;
- (B) Control development, including planning and zoning control, in areas subject to coastal hazards;
- (C) Ensure that developments comply with requirements of the Federal Flood Insurance Program; and
- (D) Prevent coastal flooding from inland projects.

Discussion:

The AST includes secondary containment to control potential fuel leaks and protect against point source pollution. In addition, the project will not increase runoff or alter drainage patterns in a way that could contribute to coastal flooding.

Managing Development

Objective: Improve the development review process, communication, and public participation in the management of coastal resources and hazards.

Policies:

- (A) Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;
- (B) Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and
- (C) Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms

understandable to the public to facilitate public participation in the planning and review process.

Discussion:

The project will require several permits and regulatory approvals, including Department of Health (DOH) requirements for fuel storage and Chapter 343 Environmental Review process. The project team has coordinated with relevant regulatory agencies and provided public access to project information through the EA, which outlines potential short-term impacts and long-term benefits of the project. The EA process will provide an opportunity for the public to review and comment on the proposed project.

Public Participation

Objective: Stimulate public awareness, education, and participation in coastal management.

Policies:

- (A) Promote public involvement in coastal zone management processes;
- (B) Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal related issues, developments, and government activities; and
- (C) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

Discussion:

The proposed project fosters public awareness and publication by promoting communication and engagement through the EA process.

Beach and Coastal Dune Protection

Objective:

- (A) Protect beaches and coastal dunes for:
 - (i) Public use and recreation;
 - (ii) The benefit of coastal ecosystems; and
 - (iii) Use as natural buffers against coastal hazards; and
- (B) Coordinate and fund beach management and protection.

Policies:

- (A) Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;
- (B) Prohibit construction of private shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;
- (C) Minimize the construction of public shoreline hardening structures including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline;
- (D) Minimize grading of and damage to coastal dunes;
- (E) Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor; and
- (F) Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.

Discussion:

The proposed project conserves open space by being sited within an already developed mauka area. Thus, it does not involve any shoreline hardening structures and preserves public access to, and recreational use of, the beaches.

Marine Resources

Objective: Promote the protection, use, and development of marine and coastal resources to assure their sustainability.

Policies:

- (A) Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;
- (B) Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;

- (C) Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;
- (D) Promote research, study, and understanding of ocean processes, impacts of climate change and sea level rise, marine life, and other ocean resources to acquire and inventory information necessary to understand how coastal development activities relate to and impact ocean and coastal resources; and
- (E) Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.

Discussion: See discussion above for Coastal Ecosystems.

3.4. Special Management Area

The purpose of the Special Management Area (SMA) is to “preserve, protect, and where possible, to restore the natural resources of the coastal zone of Hawai‘i” (HRS Chapter 205A). Any action defined as “development,” pursuant to HRS Chapter 205A-22, requires an SMA (minor or major) Use Permit. On O‘ahu, the SMA permit is administered by the City Department of Planning and Permitting. The project site is not located in an SMA and thus an SMA permit is not required.

3.5. Shoreline Setback Area

The Shoreline Setback Area is a buffer zone inland from the certified shoreline, within which development is restricted or regulated to prevent adverse impacts. ROH Chapter 26 regulates the location and type of development allowed within shoreline setback areas to minimize hazards, protect coastal ecosystems, and preserve public shoreline access. The project site is 160 feet above mean sea level and is island, and thus the proposed project is not in a shoreline area. Therefore, a Shoreline Setback Variance is not needed.

3.6. City and County of Honolulu General Plan

The O‘ahu General Plan (2021) contains aspirational objectives and policies that address the physical, social, cultural, economic, and environmental concerns affecting the City. The Honolulu City Council adopted the General Plan on December 1, 2021 and the Mayor signed it on January 14, 2022. Applicable objectives and policies from the General Plan relevant to the project are provided below.

III. Natural Environment and Resource Stewardship

Objective A: To protect and preserve the natural environment.

Policy 1: Protect O‘ahu’s natural environment, especially the shoreline, valleys, and ridges, from incompatible development.

Policy 7: Protect the natural environment from damaging levels of air, water, and noise pollution.

V. Transportation and Utilities

Objective C: To maintain a high level of service for all utilities.

Policy 1: Maintain and upgrade utility systems in order to avoid major breakdowns and service interruptions.

Policy 2: Provide improvements to utilities in existing neighborhoods to reduce substandard conditions, and increase resilience to fluctuations, natural hazards, extreme weather, and other climate impacts.

Objective D: To maintain transportation and utility systems which will help O‘ahu continue to be a desirable place to live and visit.

Policy 1: Give primary emphasis in the capital-improvement program to the maintenance and improvement of existing roads and utilities.

Policy 4: Evaluate the social, economic, and environmental impact of additions to the transportation and utility systems before they are constructed.

IX. Health and Education

Objective A: To protect the health and well-being of residents and visitors.

Policy 3: Coordinate City and County health codes and other regulations with State and Federal health codes to facilitate the enforcement of air, water, and noise pollution controls.

Discussion:

The Pacific Palisades WWPS project aligns with the objectives and policies of the City and County of Honolulu General Plan. The project aims to minimize negative impacts on the natural environment and to maintain a high level of wastewater service for residents by replacing outdated equipment to meet current regulations and protect public health. The proposed improvements are designed to be compatible with the surrounding area.

3.7. Primary Urban Center Development Plan

The City and County of Honolulu has divided O‘ahu into eight planning areas by ordinance, each with a Development Plan (DP) or a Sustainable Communities Plan that outlines the vision, objectives, and goals for future development in the area. These community-oriented plans are intended to help guide land use planning and development on O‘ahu. The Primary Urban Center (PUC) DP encompasses the area from Wai‘alae-Kāhala to Pearl City, in which the Pacific Palisades WWPS is situated. The PUC is the most populous planning area on O‘ahu, with about 450,000 residents (Department of Planning and Permitting, 2025).

The PUC DP was originally adopted in 2004 and updated in 2025. It incorporates input from representatives and community leaders from the Primary Urban Center into broader statewide public and private objectives. The key elements of the vision for the 2025 PUC DP are summarized below:

- Grow the economy by protecting Waikīkī as a walkable resort destination as well as preserving key industrial uses near Honolulu Harbor in the midst of climate change and sea level rise.
- Increase the supply of housing by encouraging a greater variety of housing types in the PUC, including mixed-use, mid-rise, and high-rise buildings. Preserve open space and encourage infill development. Develop complete streets to increase the safety and mobility of all transportation users.
- Promote integrated watershed management and improve the coordination of wastewater infrastructure and land use planning.

The plan outlines several policies and principles for physical and economic growth, transportation efficiency, and environmental protection and resilience. These principles include:

- Encourage planning, development, and construction technologies that minimize negative environmental impacts and allow buildings to operate more efficiently, thereby decreasing reliance on fossil fuels.
- Focus on equity in development.
- Adapt regulatory standards to improve resilience to climate change and coastal hazards.
- Support mixed-use infill development in key commercial corridors throughout the PUC.

The City's plan seeks to promote significant population growth while bolstering environmental resilience and quality of life for citizens.

Discussion:

The Pacific Palisades WWPS project supports the vision and policies outlined in the PUC DP by upgrading vital community infrastructure to prevent future risk to the land and surrounding coastal resources. The project is also consistent with the PUC DP's Goal WR-3: Maintain Resilient Water Infrastructure Systems, and Policy WR-3.3: Improve coordination of wastewater infrastructure and land use planning. The AST allows for easier access to the fuel tanks for necessary maintenance and repairs and avoids the risk of leakage into the soil.

3.8. City and County of Honolulu Land Use Ordinance

The LUO regulates land use in accordance with adopted land use policies, including the City's General Plan and the Development/Sustainable Community Plans. The project site is located within the P-2 General Preservation District (Figure 3), and is considered a public use and structure, which are permitted in the P-2 District. No discretionary land use permit is required for uses conducted by, or for structures owned or managed by, the federal government, the State of Hawai'i or the City to fulfill a government function, activity, or service for public benefit and in accordance with public policy.

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4. POSSIBLE ALTERNATIVES

4.1. No Action

The “no action” alternative would maintain the status quo. No improvements would be made to the WWPS. However, since this project aims to provide important upgrades to the emergency fuel storage system as required by the passage of HAR Chapter 11-280.1, this option is not feasible. The city is legally required to upgrade the fuel storage tank. To forestall this action would increase the risk to the environment and public health due to non-compliant equipment.

4.2. Delayed Action

A delayed action implies that a project of similar scope and size to the proposed action would occur at an unspecified future date. As with the “no action” alternative, this would increase the risk for long term harm to the environment and public health of the surrounding community. In addition, as stated in HAR Chapter 11-280.1, these improvements must be completed before July 15, 2028. Postponing the construction would result in failure to meet this deadline; therefore, this is not a feasible option.

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5. PERMITS AND APPROVALS

The exact permitting and approval requirements will be determined during the design phase, and the following list contains permits and approvals that may be required for the proposed project.

State of Hawai'i

- AST Notification
- Community Noise Permit
- Non-Covered and/or Covered Source Permit
- Disability and Communication Access Board Review
- State Historic Preservation Division Review

City and County of Honolulu

- Application and Permit for Tank Installation
- Building Permit
- Grubbing, Grading, and Stockpiling Permit
- Erosion Control Plan/Best Management Practices
- Flammable/Combustible Liquid Permit

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6. DETERMINATION

According to HAR §11-200.1-13, an agency must determine whether an action may have a significant impact on the environment, considering all phases of the project, its expected primary and secondary impacts, cumulative effects with other projects, and its short- and long-term effects. In making this determination, the rules establish “significance criteria” to guide the consideration of potential environmental effects.

The proposed project is not likely to have a significant impact on the physical or human environment based on the analysis presented in this document. The City Department of Environmental Services anticipates that the appropriate determination is a Finding of No Significant Impact (FONSI). The supporting rationale for this finding as set forth in HAR §11-200.1-13 is discussed below.

(1) Irrevocably commit a natural, cultural, or historic resource;

The proposed project is not expected to result in the loss of or damage to natural, cultural, or historic resources. Instead, it aims to provide protection against the harmful effects to the environment and public health that would occur as a result of deterioration or malfunction if the project were not undertaken. The project proposes to upgrade an existing underground fuel storage tank to an aboveground fuel storage tank system with mandated secondary containment and interstitial monitoring in an area that has been previously disturbed by grading, utility lines and road construction. The proposed work is to take place within an existing pump station facility and will not extend the footprint of the property. Biological resources may exist in the area and recommendations by the DLNR-DOFAW will be followed to mitigate any impact on these resources.

(2) Curtail the range of beneficial uses of the environment;

The proposed project does not limit nor prevent future beneficial uses of the surrounding environment for recreational, cultural, or preservation use. Its scope is limited to land which has already been developed and does not entail the expansion of that area beyond existing boundaries.

(3) Conflicts with the State's environmental policies or long-term environmental goals established by law;

The project does not conflict with the State's environmental policies or long-term environmental goals. Rather, it aligns with Hawai'i's environmental goals by reducing the risk of fuel leakage to the surrounding soils. Provision of the AST will ensure that the facility is operable during an emergency power outage to prevent wastewater back-up.

(4) Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community or State;

The project is not expected to have an adverse effect on economic, social, or cultural welfare. By using BMPs during construction, disturbances to the surrounding community are expected to be minimal. The upgrades to the WWPS prevent future system failures that would cause significant disruptions to the local infrastructure. The ability to better monitor and administer needed repairs to the fuel storage system will help to protect the general welfare of the community.

(5) Have a substantial adverse effect on public health;

The project is not projected to have an adverse effect on public health. Instead, it aims to safeguard public health by reducing the possibility of system failure within the WWPS. By using BMPs, temporary impacts such as fugitive dust, noise, and intermittent traffic during the construction process are expected to be negligible.

(6) Involve adverse secondary impacts, such as population changes or effects on public facilities;

No major adverse secondary impacts are expected to result from the proposed project. Construction work will occur within the site boundaries and is not expected to significantly disrupt traffic. Upgrades are expected to positively impact the environmental sustainability of the existing public facility.

(7) Involves a substantial degradation of environmental quality;

No major degradation of environmental quality is expected to result from the proposed project. The installation of the AST and removal of the existing UST will occur in a previously developed area. Through the use of BMPs, construction work will limit impacts such as erosion or runoff. The project will serve the purpose of protecting the environment by reducing the risk of fuel spillage and malfunction.

(8) Be individually limited but cumulatively has substantial adverse effect upon the environment or involves a commitment for larger actions;

The project is limited in scope. No larger or cumulative impact on the environment is expected from the project.

(9) Have a substantial effect on rare, threatened, or endangered species or their habitat;

The project area is not located within any critical habitats. No major impact on rare, threatened, or endangered species, or critical habitats is expected. With BMPs, construction work is expected to mitigate any disturbances to regional species to a minimal effect.

(10) Have a substantial adverse effect on air or water quality or ambient noise levels;

No substantial adverse effect on air or water quality or ambient noise levels are expected. Any potential impacts will be temporary and limited to construction-related disturbances, which will be mitigated through BMPs.

(11) Have a substantial adverse effect or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

The project is not situated in an environmentally sensitive area.

(12) Have a substantial adverse effect on scenic vistas and view planes identified in county or state plans or studies; or

No substantial adverse effect on scenic vistas or view planes is expected to result from the project. The proposed project will take place within a fenced parcel. The entire WWPS facility is surrounded by a forested area and is not visible from the residential street.

(13) Require substantial energy consumption or emit substantial greenhouse gas.

Installation of the AST and piping would take place during a brief period and would not require substantial energy consumption. Greenhouse gas emissions from diesel-power construction equipment and generators would occur during the temporary period of construction. No mitigation is proposed for temporary impacts. In the long term, permanent fuel tank system infrastructure represents a continuation of current operations.

7. PUBLIC AGENCY REVIEW AND CONSULTATION

An Early Consultation Letter and Handout was sent on April 8, 2025 to initiate the environmental review process. A list of consulted agencies, organizations, and interest groups are listed below. There were ten formal responses to the early consultation letter, as indicated by the ✓ below. A copy of the Early Consultation Letter and Handout, as well as copies of the responses received, are included in the Appendix.

State of Hawai'i

- Department of Hawaiian Home Lands
- Department of Health
- Department of Land and Natural Resources
 - Aha Moku Advisory Committee
 - Commission on Water Resource Management ✓
 - Division of Forestry and Wildlife ✓
 - Engineering Division ✓
 - Land Division ✓
- Department of Transportation
- Hawai'i Emergency Management Agency
- Office of Hawaiian Affairs
- Office of Planning and Sustainable Development ✓
- Senate District 16 (Senator Brandon J. C. Elefante)
- House District 34 (Representative Gregg Takayama)

City and County of Honolulu

- Board of Water Supply ✓
- Department of Climate Change, Sustainability, and Resiliency
- Department of Design and Construction ✓
- Department of Emergency Management
- Department of Land Management

Department of Facilities Maintenance

Department of Parks and Recreation

Department of Planning & Permitting ✓

Department of Transportation Services

Honolulu City Council District 8 (Councilmember Val Aquino Okimoto)

Honolulu Fire Department ✓

Honolulu Police Department ✓

Other

Hawaiian Electric Company

Pearl City Neighborhood Board No. 21

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Appendix A

Archaeological Literature Review and Field Inspection Report

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Appendix B

Early Consultation Letter, Handout, and Responses

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Draft

**Archaeological Literature Review and Field Inspection
for the Pacific Palisades Wastewater Pump Station
Improvements Project,
Mānana Ahupua‘a, ‘Ewa District, O‘ahu
TMK: (1) 9-7-091:071 por.**

**Prepared for
Townscape, Inc.
on behalf of the
City and County of Honolulu (C&C) Department of Environmental Services**

**Prepared by
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and
Hallett H. Hammatt, Ph.D.**

**Cultural Surveys Hawai‘i, Inc.
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May 2025

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Management Summary

Reference	Archaeological Literature Review and Field Inspection for the Pacific Palisades Wastewater Pump Station Improvements Project, Mānana Ahupua‘a, ‘Ewa District, O‘ahu, TMK: (1) 9-7-091:071 por. (Shideler and Hammatt 2025)
Date	May 2025
Project Number(s)	Cultural Surveys Hawai‘i, Inc. (CSH) Job Code: MANANA 19
Investigation Permit Number	CSH completed the fieldwork component of this study under archaeological fieldwork permit number 25-04, issued by the Hawai‘i State Historic Preservation Division (SHPD) per Hawai‘i Administrative Rules (HAR) §13-13-282.
Agencies	SHPD, City and County of Honolulu (C&C) Department of Environmental Services (ENV)
Project Proponent	C&C ENV
Project Funding	C&C
Project Location	<p>The Pacific Palisades Wastewater Pump Station (WWPS) is located at 1810 Komo Mai Drive (accessed from an easement driveway off Lanikeha Place), Pearl City, Hawai‘i 96782 in the traditional Hawaiian land division (<i>ahupua‘a</i>) of Mānana, ‘Ewa District in south central O‘ahu (TMK: [1] 9-7-091:071 por.). The Pacific Palisades WWPS is located in the uplands of Pearl City at approximately 160-foot (ft) elevation. The Pacific Palisades WWPS is depicted on a portion of a 2017 Waipahu U.S. Geological Survey (USGS) 7.5-minute series topographic quadrangle (Figure 1), a tax map plat (Figure 2), and a 2022 aerial photograph (Figure 3). It may be noted that the WWPS fenced perimeter area occupies approximately half the TMK parcel (Figure 4).</p> <p>The actual project area per se for the installation of a new 1,000-gallon diesel fuel aboveground storage tank (AST) and a short stretch of new fuel piping connecting to the WWPS pump station building is a very small area on the north side of the WWPS pump station building in the northeast/central portion of the facility as shown in Figure 4 and illustrated on annotated photographs in Figure 5 and Figure 6.</p>
Land Jurisdiction	C&C (ENV)
Project Acreage	The fenced Pacific Palisades WWPS study area is approximately 0.72 acres or 0.29 hectares.

	The actual project area (area of new ground disturbance) is understood as less than 10 square meters (sq m).
Project Description and Ground Disturbance	<p>The C&C ENV proposes the following site improvements:</p> <ul style="list-style-type: none"> • Replace an underground storage tank (UST) with an AST • Replace underground fuel piping • Replace fuel monitoring panel and all sensors • Connect new fuel monitoring panel to Supervisory Control and Data Acquisition (SCADA)
Historic Preservation Regulatory Context	This is a state/municipal “governmental” project needing review under Hawai‘i Revised Statutes (HRS) §6E-8 and HAR §13-275
Document Purpose	<p>This investigation was designed—through detailed historical, cultural, and archaeological background research and a field inspection of the project area—to determine the likelihood that historic properties may be affected by the project and based on findings, consider cultural resource management recommendations. This document is intended to facilitate the project’s planning and support the project’s historic preservation environmental review compliance. This investigation does not fulfill the requirements of an archaeological inventory survey investigation, per HAR §13-276.</p> <p>This archaeological literature review and field inspection focused on the specific project area (indicated area of ground disturbance) but the study area is the fenced Pacific Palisades WWPS (an area of less than 0.75 acre).</p>
Natural and Built Environment	<p>The project area is located approximately 3.0 km north of the coast at the East Loch of Pearl Harbor within a southeastern bend of intermittent Waimano Stream approximately 600 m upslope (northeast) of its confluence with Waiawa Stream.</p> <p>According to the U.S. Department of Agriculture (USDA) Soil Survey Geographic (SSURGO) database (2001) and soil survey data gathered by Foote et al. (1972) the majority of the soils within the project area (Figure 7) are Kawaihapai clay loam, 0 to 2% slopes (KIA) soils with a small area on the north on Rock land (rRK). For Kawaihapai soils:</p> <p style="padding-left: 40px;">This series consists of well-drained soils in drainageways and on alluvial fans on the coastal plains on the islands of Oahu and Molokai. These soils formed in alluvium derived from basic igneous rock in humid uplands. [...] These soils are used for sugarcane, truck crops, and pasture. The natural vegetation consists of kiawe, koa haole, lantana, and bermudagrass. [Foote et al. 1972:63–64]</p> <p>KIA soils are further described as: “occupies smooth slopes. [...] Permeability is moderate, runoff is slow, and the erosion hazard is no more than slight” (Foote et al. 1972:64).</p>

	<p>Rock land is described as:</p> <p>[...] made up of areas where exposed rock covers 25 to 90 percent of the surface. [...] The rock outcrops and very shallow soils are the main characteristics. [...] In many areas, especially on the island of Oahu, the soil material associated with the rock outcrops is very sticky and very plastic. It also has high shrink-swell potential. Buildings on the steep slopes are susceptible to sliding when the soil is saturated. Foundations and retaining walls are susceptible to cracking. [Foote et al. 1972:119]</p> <p>Annual rainfall is estimated at approximately 1,000 mm (39.4 inches) (Giambelluca et al. 2013) which is suggested to be marginal for non-irrigated agriculture.</p>
Background Research Methods	<p>Background research included a review of previous archaeological studies on file at the SHPD; review of documents at Hamilton Library of the University of Hawai‘i, the Hawai‘i State Archives, the Mission Houses Museum Library, the Hawai‘i Public Library, and the Bishop Museum Archives; study of historic photographs at the Hawai‘i State Archives and the Bishop Museum Archives; and study of historic maps at the Survey Office of the Department of Accounting and General Services. Historic maps and photographs from the CSH library were also consulted. In addition, Māhele records were examined from the Waihona ‘Aina database (Waihona ‘Aina 2025).</p>
Cultural Context	<p>The word <i>mānana</i> is translated as “to stretch out,” “to spread out,” or “to protrude” (Pukui and Elbert 1986:236). This may be a reference to the Mānana Peninsula, which protrudes into Pearl Harbor. Other sources indicate the place name means “the meeting of land,” and that it was named after the convergence of two lava flows in the Pearl City area (Ching and Nakamura 1996:1).</p> <p>The great bays of Pearl Harbor produced a wide variety and abundance of edible shellfish and were famous as the summer home of mullet (Handy and Handy 1972:470). Numerous <i>loko</i> (fishponds) were constructed along the shores of Pearl Harbor, and the area was valued by Hawaiian chiefs. However, the introduction of trade and foreign goods after Western Contact, along with Kamehameha’s unification of the islands, shifted attention to Kou (old name for Honolulu, used until about 1800) (Pukui et al. 1974:117), which had a deep enough harbor for ships to pull in and anchor. Kou became the center of activity as royalty and the general populace moved away from the outer districts toward the center of commerce.</p> <p>The traditional Hawaiian land units (<i>ahupua‘a</i>) of ‘Ewa district bounding Pearl Harbor were well-populated but the population was very largely focused in immediate proximity of the coast where stream-fed bottom lands allowed for irrigation of taro patches and gave easy access to the rich marine resources of the embayed lochs. A main trail crossing the south shore of O‘ahu ran close to</p>

	the coastline and effectively formed the upslope limit of most habitation and intensive agriculture.
Land Commission Awards (LCAs)	<p>Mānana Ahupua'a was awarded to Princess Ruth Ke'elikōlani (great granddaughter of Kamehameha I) in the division of lands or Māhele of 1848 (Kame'eleihiwa 1992:246).</p> <p>In Mānana Ahupua'a, as was the pattern in 'Ewa District, most native tenant lands were within 400 m of the margin of Pearl Harbor (Figure 8). There were no native tenant Land Commission Awards (LCAs) within 2.0 km of the Pacific Palisades WWPS.</p>
Historical Background Focused on a Review of Historic Maps and Aerial Photographs	<p>The 1853 Bishop map (Figure 9) shows the main cross-<i>ahupua'a</i> trail that arced around Pearl Harbor (labeled "Ala Aupuni" or "Government Road") 2.5 km south of the location of the Pacific Palisades WWPS with little development upslope. The streams are labeled with the Kahawai o Waimano immediately south of the project area. Approximately 1.6 km northeast of the project area is a label for "naOkipuu" indicating there were a plurality of forest clearings ("<i>okipu'u</i>"; Lucas 1995:82) which were often forest areas used for cultivation of tree crops such as bananas or breadfruit. On the one hand, this points out that Hawaiians utilized upland areas of Mānana somewhat intensively, but on the other hand, it suggests such use of upland areas was likely focused further upslope where rainfall would have been greater to support tree crops.</p> <p>The 1894 Kananui map (Figure 10) shows no development inland of the main road to Honolulu (<i>ala aupuni</i>) or anywhere near the location of the Pacific Palisades WWPS.</p> <p>The 1906 Donn map (Figure 11) shows the location of the Pacific Palisades WWPS as within the sugarcane cultivation lands of the Honolulu Plantation.</p> <p>The eastern section of 'Ewa was largely developed by the Honolulu Plantation Company. J.R. Williams first developed sugarcane in the 1850s, before leasing land and building a sugar mill in 'Aiea in 1899 with the Honolulu Sugar Company (Condé and Best 1973:327). It then became the Honolulu Plantation Company in 1900. Originally in 'Aiea, the plantation expanded along the northern inshore and upland areas of Pearl Harbor. The expanse of the Honolulu Plantation Company lands seems to extend from 'Aiea westward nearly as far as Mānana and Waiawa streams. In 1914, the company harvested 19,000 tons of sugar. It was taken over by the Oahu Sugar Company in 1947 (Condé and Best 1973:313).</p> <p>The Taylor (1900-1925) map of the property of the Honolulu Sugar Company (Figure 12) confirms the Pacific Palisades WWPS location was within Honolulu Plantation ("Part 5") lands but provides no details of land use in the immediate area. The Taylor map shows the explosive growth of what from 1890 would be known as "Pearl City."</p>

	<p>The “Great Land Colonization Scheme,” of James Campbell and Benjamin Franklin Dillingham was to have widespread impacts on the landscape of O‘ahu. For example, this “scheme” led to a new name, Pearl City, for the <i>makai</i> (seaward) lands of Mānana and adjacent areas. A contest was held starting on 9 May 1890 for “the best name for the town recently laid out at Ewa [...]” Submitted names included “Dillingham,” “Dillinghampton,” “Dilinama,” “Dillinghamsville,” “St. Dillingham Pearl,” “Dillingmania,” and “Manana” but on 16 May 1890 the award committee unanimously selected a submittal by Mr. J.M. McChesney, Edw. P. Olesen, and Fred Peterson that the town be called “Pearl City” (<i>Pacific Commercial Advertiser</i>, 17 May 1890).</p> <p>The 1919 U.S. Army map (Figure 13) shows sugarcane cultivation symbols just to the north and south of the location of the Pacific Palisades WWPS but whether sugarcane was cultivated there is unclear. An unimproved road is shown arcing just to the south around the WWPS location and a plantation railroad ran 100 m to the southeast.</p> <p>The 1924 Evans map (Figure 14) shows the Pacific Palisades WWPS location approximately 100 m upslope (outside) of the “Upper Limits of Cane (Approximate).” Several areas of pineapple cultivation are indicated further upslope, but these may have been in a band where rainfall would support pineapple cultivation. No buildings have been indicated as yet within approximately 2 km of the WWPS location.</p> <p>In the 1935 U.S. Army map (Figure 15, and the very similar 1943 map, Figure 16) we see substantial Honolulu Plantation infrastructure in the general vicinity including roads, railroads, ditches, and reservoirs. A small plantation camp of eight houses is indicated 500 m north of the WWPS and a lone house is indicated 200 m to the west.</p> <p>The 1952 USGS aerial photograph (Figure 17) shows extensive neighboring fields of both sugarcane and pineapple but suggests the immediate area of the Pacific Palisades WWPS was never in large scale commercial agriculture. A number of buildings are shown in the vicinity but not within the future WWPS.</p> <p>The 1952 aerial photograph, the 1954 USGS map (Figure 18) and the 1962 USDA aerial photograph (Figure 19) show several large warehouse-like structures to the west which are understood as leftover World War II buildings.</p> <p>The 1962 aerial photograph appears to show structures (possibly three round tanks) at the Pacific Palisades WWPS location. The 1968 USGS map (Figure 20) has the annotation “Sewage Disp” at this location and appears to show four round tanks, a rectangular tank, and a building but with much of the infrastructure to the west of the present fenced perimeter of the WWPS. The 1962 aerial (Figure 19) shows Komo Mai Drive as built but the area on the gently sloping table land to the south is still a sea of sugarcane. By 1968 (Figure 20) much of this cane land is in subdivisions, and by 1978 (Figure 21) it is all in subdivisions.</p>
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	<p>The 1978 USGS orthophotograph overlay similarly suggests wastewater infrastructure both within the present fenced WWPS and extending to the west. In the next 20 years (Figure 22) there is a little further residential development to the north but the vicinity is much as it is today.</p> <p>The City and County website lists the “Date Built” and “Year in service” for the Pacific Palisades Wastewater Pump Station as 1983. This is a bit of a mystery in that we appear to be seeing wastewater infrastructure in 1962 (Figure 19) and there is clearly a sewage disposal facility present in 1968 (Figure 20).</p>
Synopsis of Previous Archaeological Work in the Vicinity	<p>Previous archaeological studies in the vicinity are depicted in Figure 23 and summarized in Table 1. Previously identified historic properties in the vicinity are located on Figure 24 and summarized in Table 2.</p> <p>The vicinity of the Pacific Palisades WWPS is not very well studied which is understood as largely due to the vast majority of development having pre-dated contemporary historic preservation laws but perhaps also to the perception that any archaeological resources on these gently sloping table lands would likely have been lost in nearly a century of intensive commercial sugarcane (and pineapple) cultivation and subsequent dense suburban development.</p> <p>We show only one prior archaeological study (Griffin and Yent 1978) within 500 m of the Pacific Palisades WWPS. Griffin and Yent (1978) did identify an agricultural complex (State Inventory of Historic Places or SIHP # 50-80-09-04105), but this was more than a kilometer up the valley from the WWPS. Recent studies on the neighboring table land (Farley et al. 2018, Shideler and Borthwick 2022) have not identified any historic properties.</p> <p>The nearest historic property, approximately 500 m to the west (Figure 24), is a former (asphalt) road (identified with temporary site # CSH 43 in Bautista et al. 2013).</p>
Fieldwork Effort	<p>A brief field inspection of the project area was conducted by CSH archaeologist David W. Shideler, M.A., and Ceinwyn Phipps, B.A., on 20 March 2025. A tracklog of one of the two archaeologists is supplied in Figure 25 with a key to the following photographs indicating their general location and orientation. The field inspection was completed to identify the likelihood of historic properties being present within the project area.</p> <p>General photographs were taken of the project area starting at the entry gate (Figure 26) and proceeding clockwise to the southwest corner (Figure 27), the northwest corner (Figure 28), the northeast corner (Figure 29).</p> <p>Views are provided of the Pump Station building to aid in any possible evaluation of this as a potential historic property with views of the front or southeast side (Figure 30), southwest side (Figure 31), back or northwest side (Figure 32), and northeast side (Figure 33).</p>

	<p>The immediate vicinity of the existing 1,000-gallon diesel UST is depicted in Figure 34 and Figure 35; the immediate area proposed for the installation of a new AST is shown in Figure 36 and Figure 37; and the immediate area for the indicated new fuel supply/return piping connecting the new AST to the existing Pump Station building is shown in Figure 38 and Figure 39.</p> <p>No surface historic properties (with the possible exception of the WWPS itself) were observed and none are thought to be present. The prospect of significant subsurface deposits was evaluated in the field and the probability was evaluated as low. The potential impact of the project to any character-defining aspects of the WWPS itself as a potential historic property was evaluated and regarded as low, noting that 1) the indicated date built is 1983, 2) the new AST will be in the back of the facility, and 3) the existing Pump Station building will barely be touched.</p>
Historic Properties Potentially Affected	<p>No historic properties have been identified previously at the Pacific Palisades WWPS and none were observed during the present fieldwork. The present fieldwork evaluated the potential for significant subsurface deposits as low. The prospect of the present improvements project adversely impacting any character-defining aspects of the WWPS as a potential historic property was considered in the field and it was evaluated that there would be no adverse impact from the present project to the WWPS as a potential historic property.</p>
Historic Preservation Next Steps	<p>This study would support a C&C ENV determination as per HAR §13-275-7(a)(1) of “No historic properties affected” and for no further historic preservation study.</p> <p>Early consultation with the SHPD archaeology and architecture branches (with submittal of this study to the SHPD’s Hawai‘i Cultural Resources Information System (or HICRIS system) is recommended.</p>

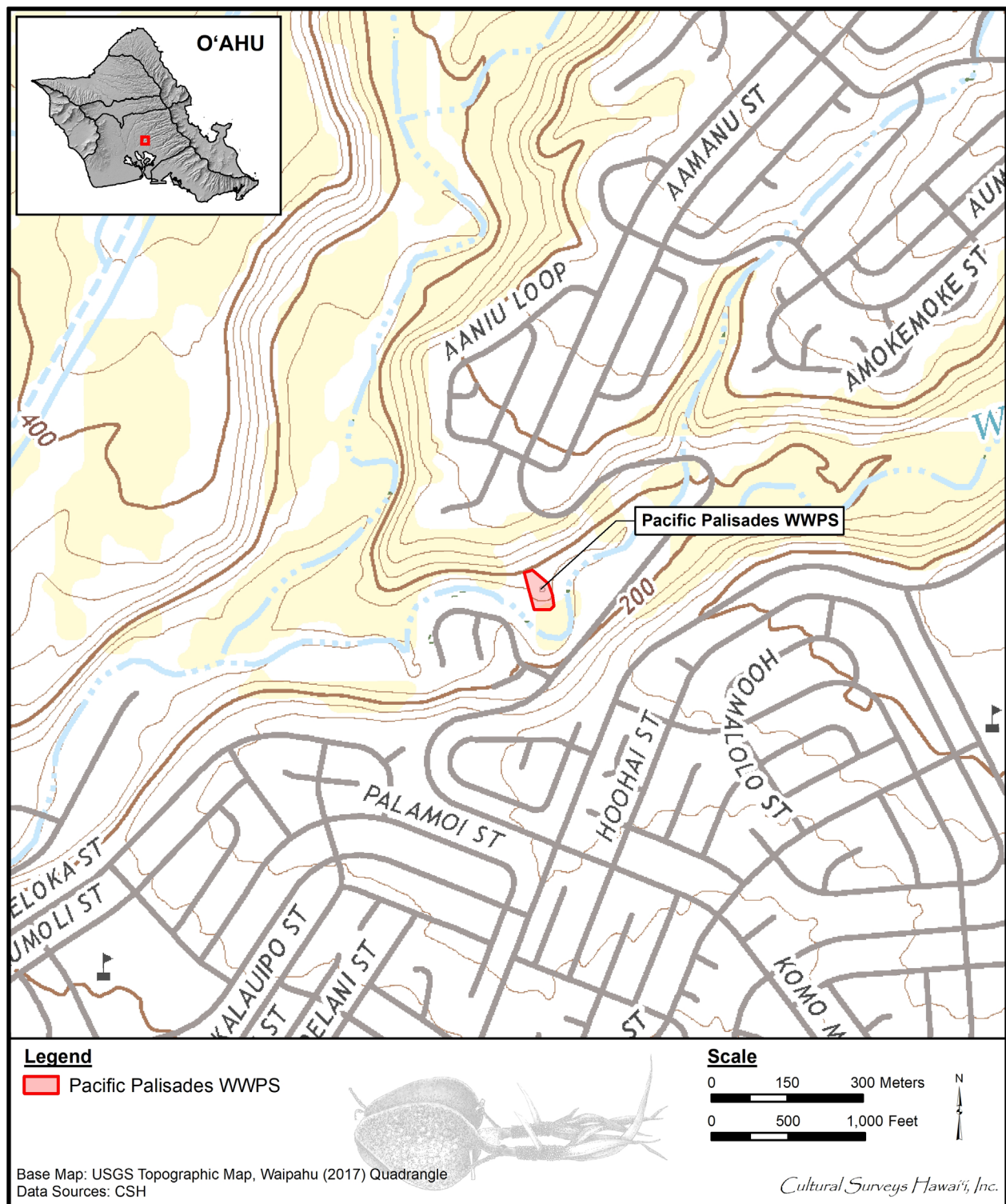


Figure 1. Portion of a 2017 Waipahu USGS 7.5-minute topographic quadrangle showing the Pacific Palisades WWPS

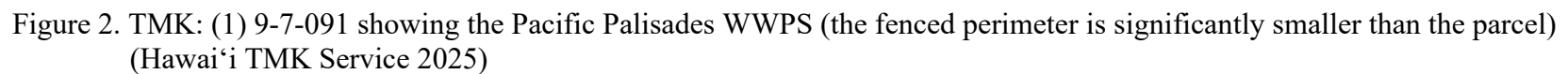




Figure 3. 2022 Google Earth aerial photograph showing the Pacific Palisades WWPS

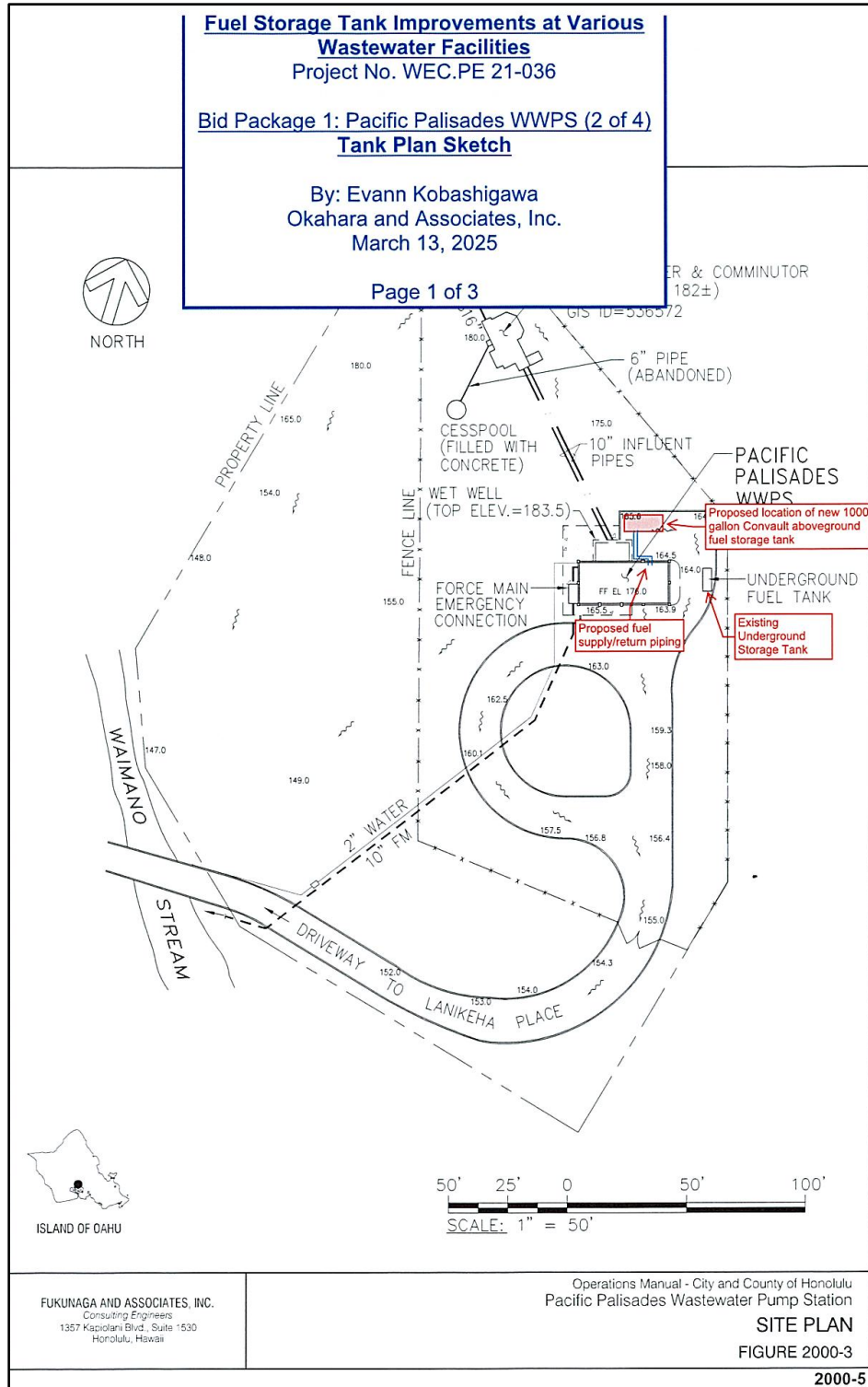


Figure 4. Pacific Palisades WWPS showing the proposed location of the new 1,000-gallon Convault above ground fuel storage tank and proposed fuel supply/return piping (note that as indicated, the WWPS occupies approximately ½ of the TMK parcel) (Okahara and Associates, Inc.; courtesy of client)



Figure 5. Photograph showing the proposed location of the new 1,000-gallon Convault above ground fuel storage tank and proposed fuel supply/return piping north of the Pacific Palisades WWPS pump station building (Okahara and Associates, Inc.; courtesy of client)



Figure 6. Photograph showing the proposed location of the new 1,000 gallon Convault above ground fuel storage tank and proposed fuel supply/return piping north of the Pacific Palisades WWPS pump station building (Okahara and Associates, Inc.; courtesy of client)

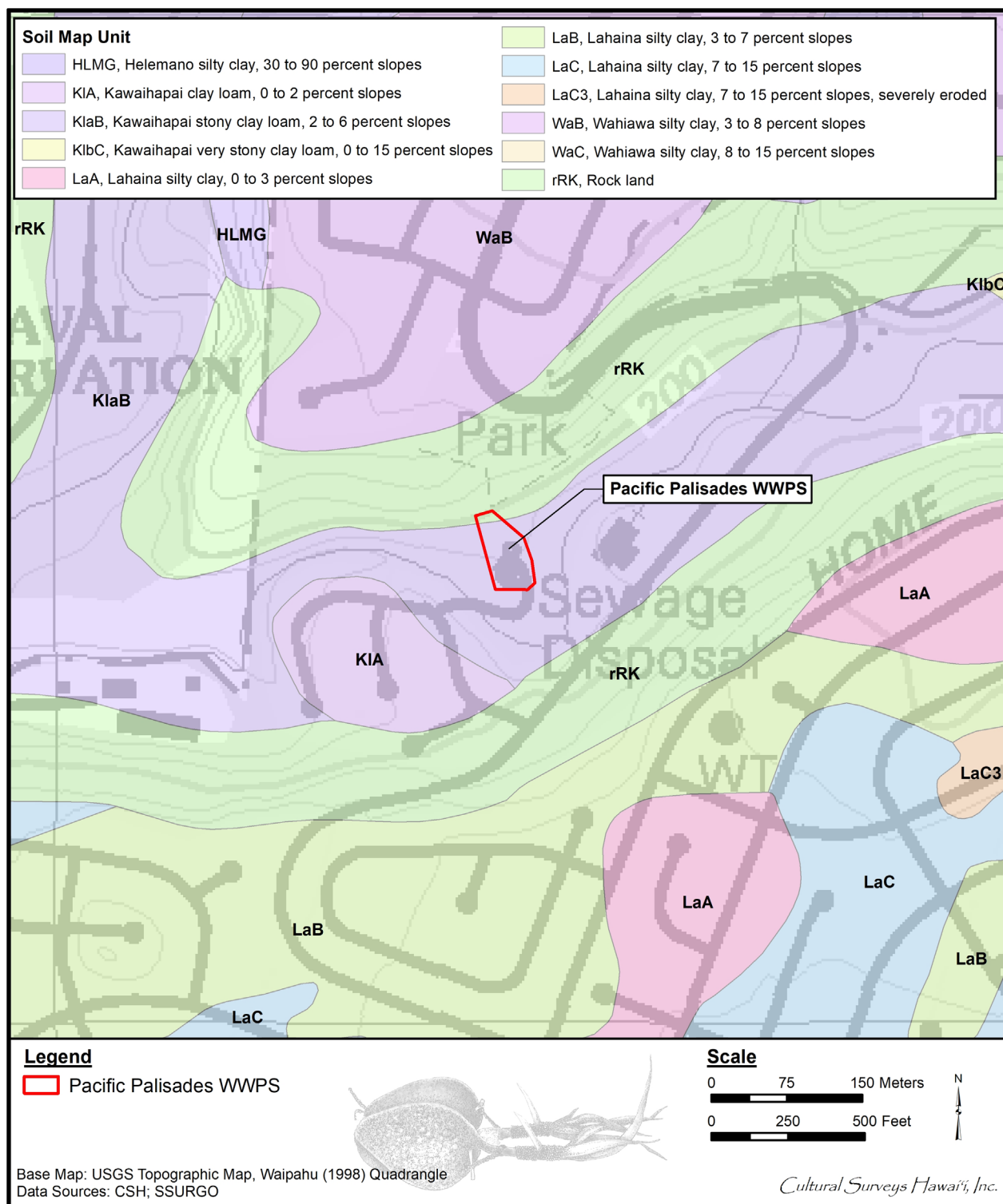


Figure 7. Portion of a 1998 Waipahu USGS topographic map with overlay of *Soil Survey of the Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii* (Foote et al. 1972; USDA SSURGO 2001), indicating soil types within and surrounding the Pacific Palisades WWPS

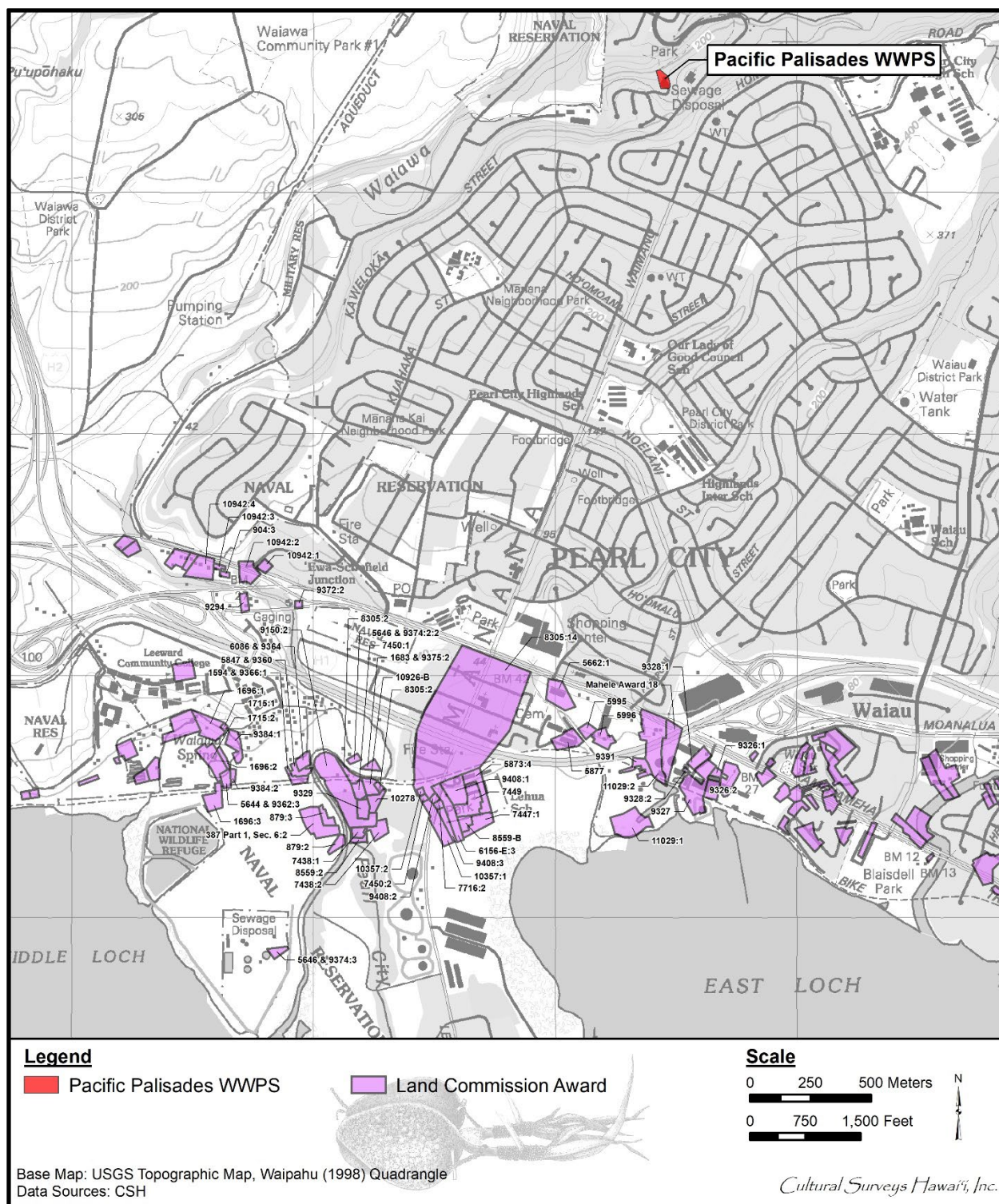


Figure 8. Portion of the 1998 Waipahu USGS 7.5-minute topographic quadrangle with overlay of native tenant LCAs in Manana and adjacent *ahupua'a* (all close to the margin of Pearl Harbor) in relation to the Pacific Palisades WWPS

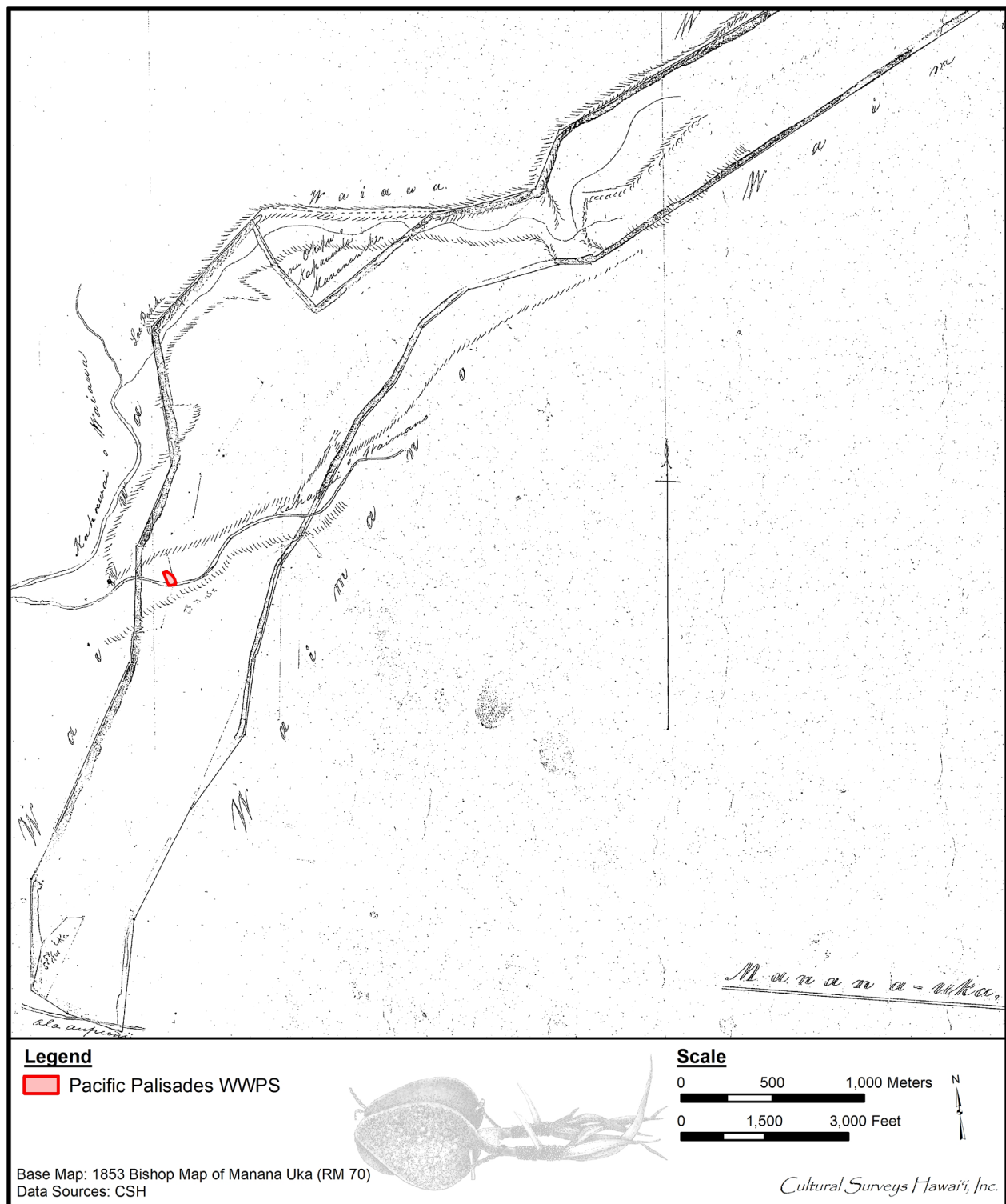


Figure 9. Portion of the 1853 Bishop map of Mānana Uka (RM 70) showing the location of the Pacific Palisades WWPS

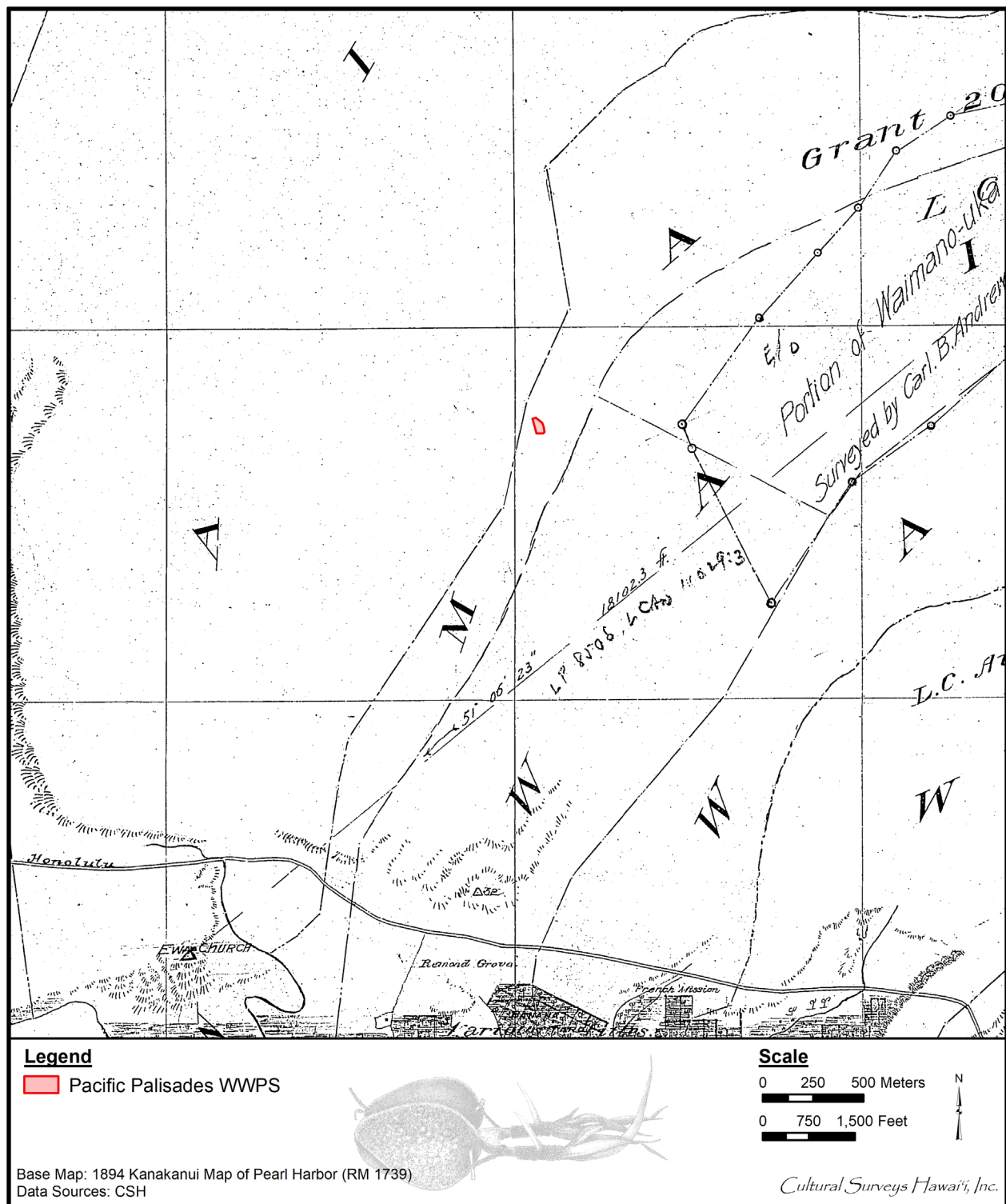


Figure 10. Portion of the 1894 Kānakanui map of Pearl Harbor (RM 1739) showing the location of the Pacific Palisades WWPS

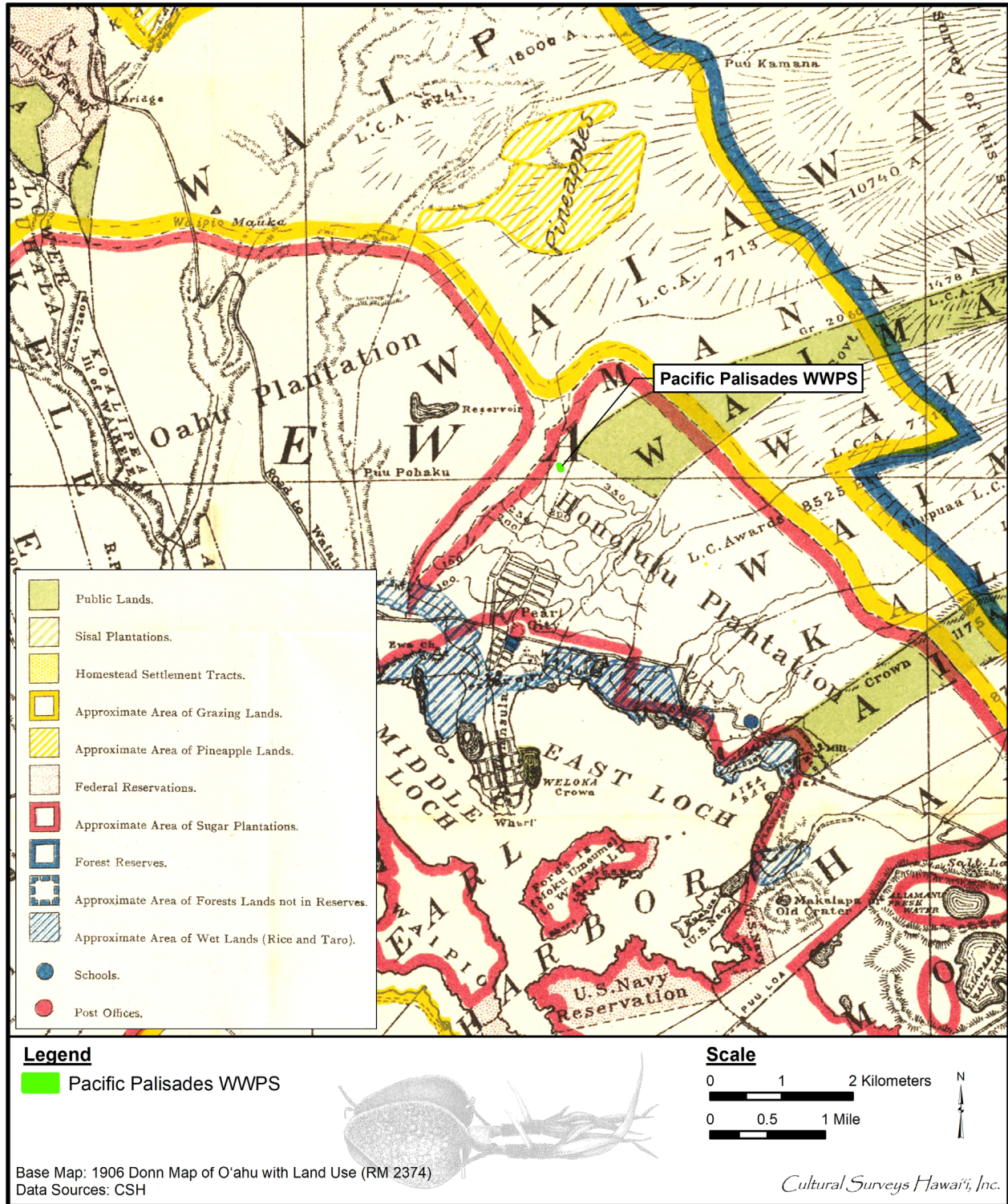


Figure 11. Portion of the 1906 Donn map of O'ahu with land use (RM 2374) showing the location of the Pacific Palisades WWPS at the *mauka* (inland, toward the mountains) edge of Honolulu Plantation commercial sugarcane fields

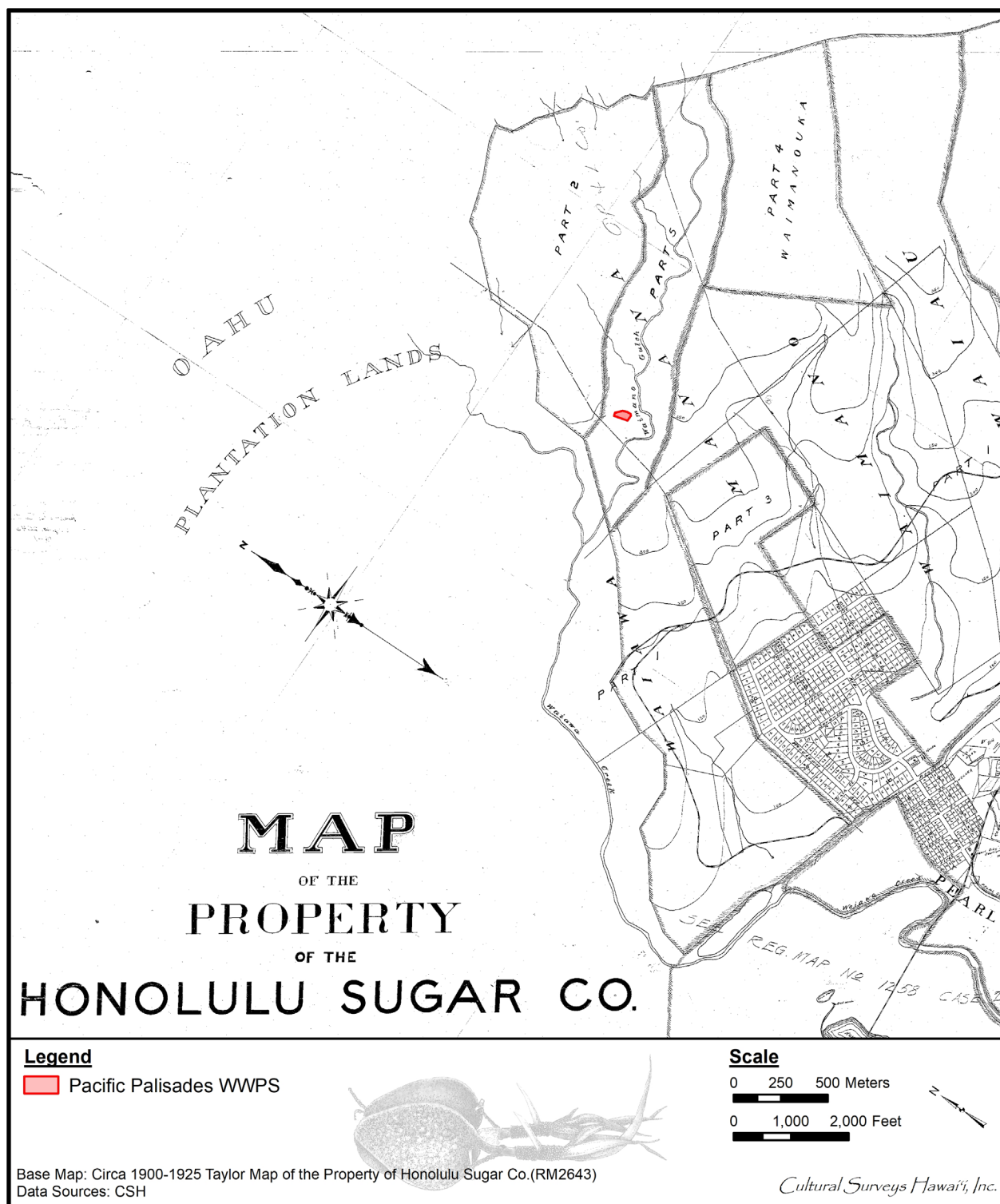


Figure 12. Portion of the ca. 1900-1925 Taylor map of the Property of Honolulu Sugar Company (RM 2643) showing the location of the Pacific Palisades WWPS was at the *mauka* edge of Honolulu Sugar Company commercial sugarcane fields

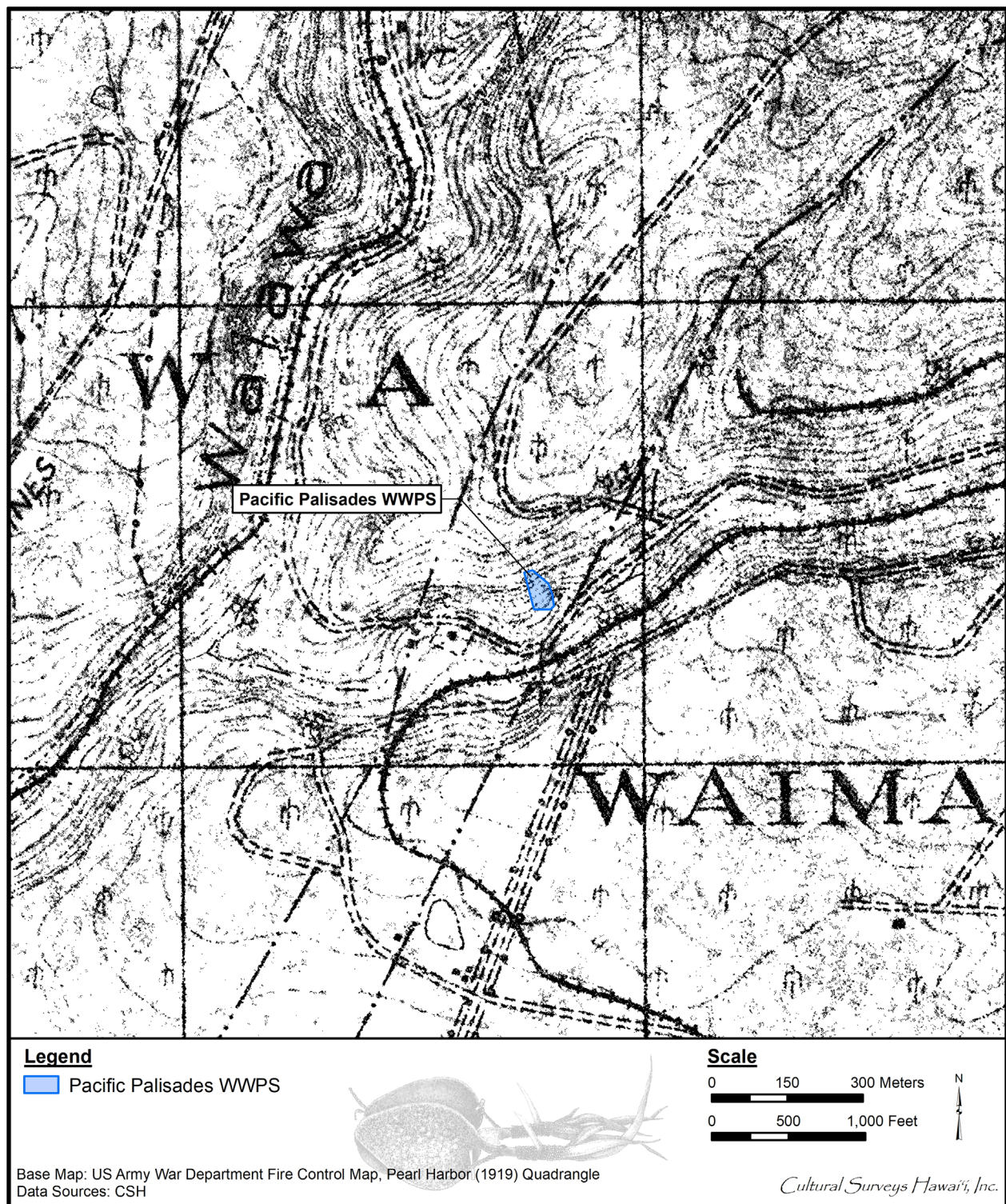


Figure 13. Portion of the 1919 U.S. Army War Department fire control map, Pearl Harbor quadrangle, showing the location of the Pacific Palisades WWPS at the *mauka* edge of Honolulu Sugar Company commercial sugarcane fields

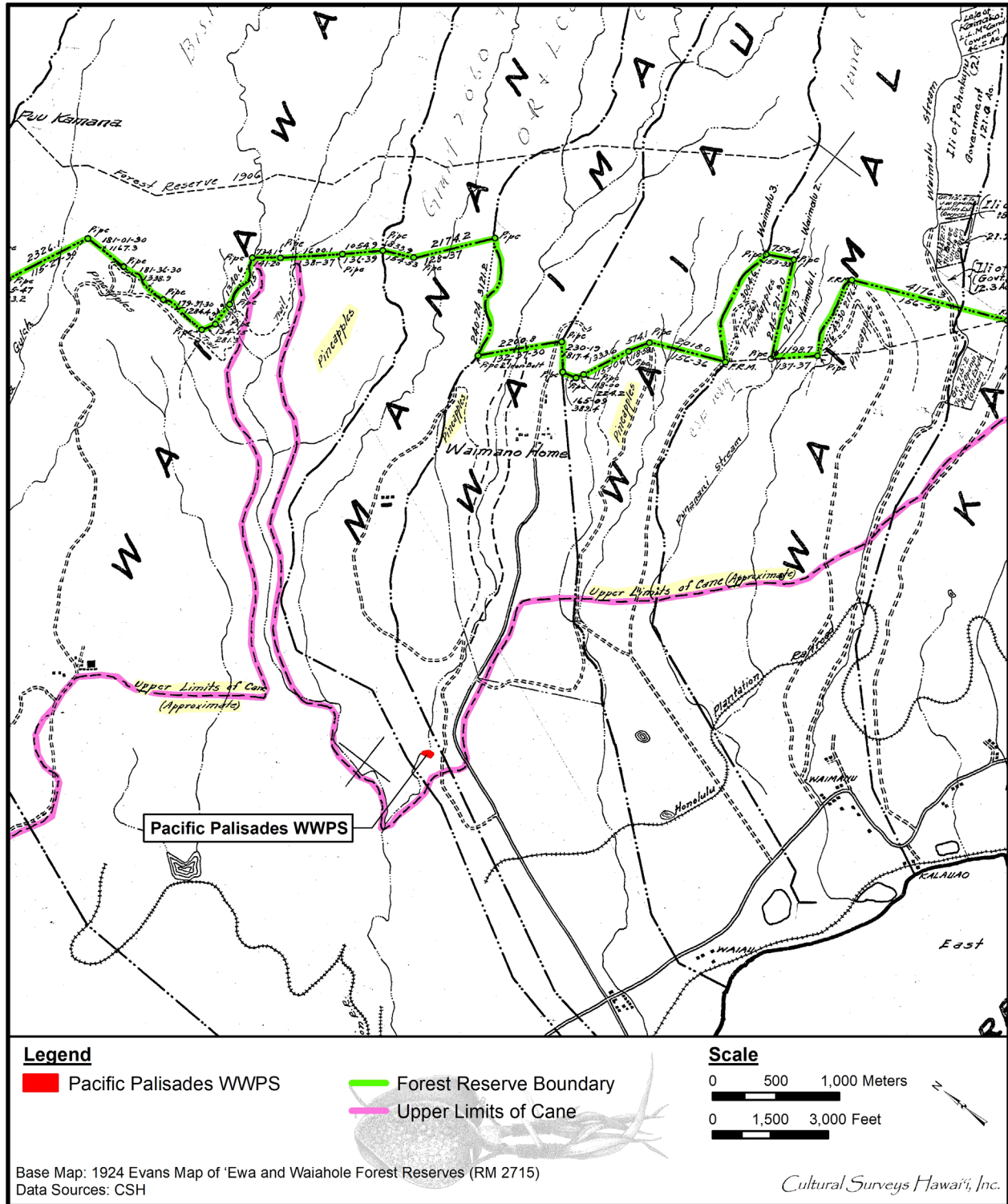


Figure 14. Portion of the 1924 Evans map of 'Ewa and Waiahole Forest Reserves (RM 2715) showing the location of the Pacific Palisades WWPS

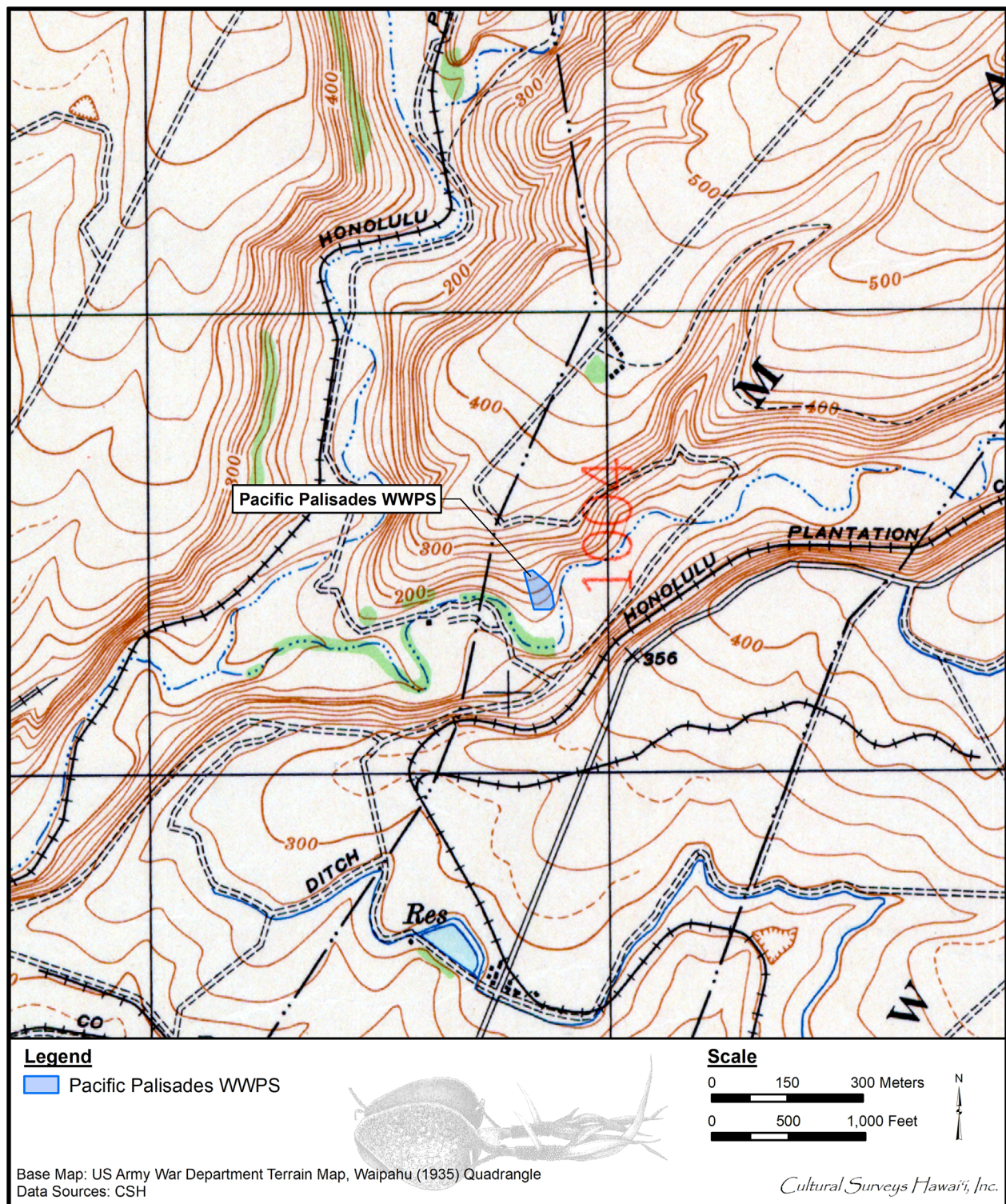


Figure 15. Portion of the 1935 U.S. Army War Department terrain map, Waipahu quadrangle, showing the location of the Pacific Palisades WWPS

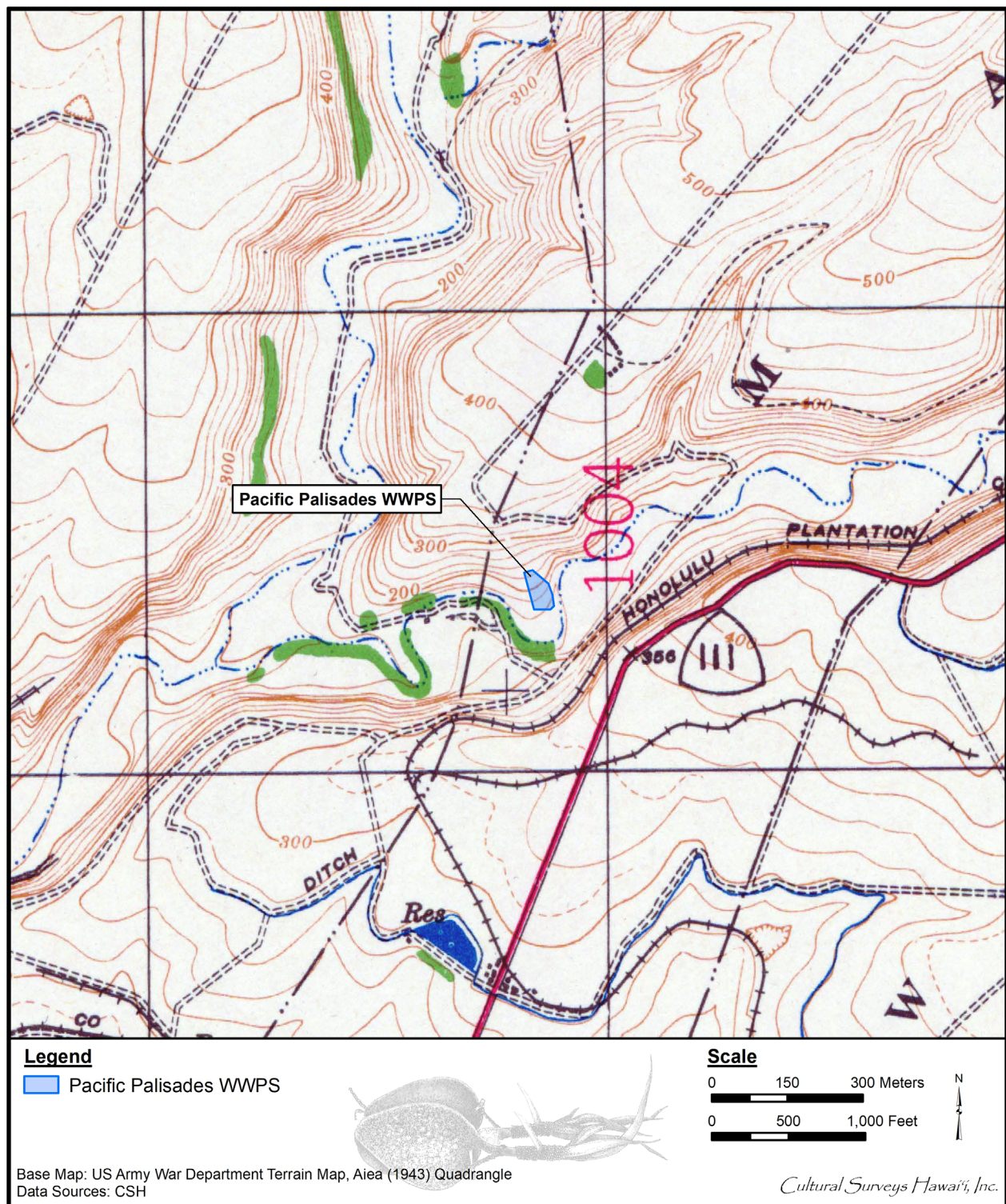


Figure 16. Portion of the 1943 U.S. Army War Department terrain map, Aiea quadrangle, showing the location of the Pacific Palisades WWPS



Figure 17. 1952 USGS aerial photograph (UH MAGIS) showing the project area indicating the southern portion of the campus was within Oahu Sugar Company commercial sugarcane fields while the vicinity of the Pacific Palisades WWPS was within a gulch

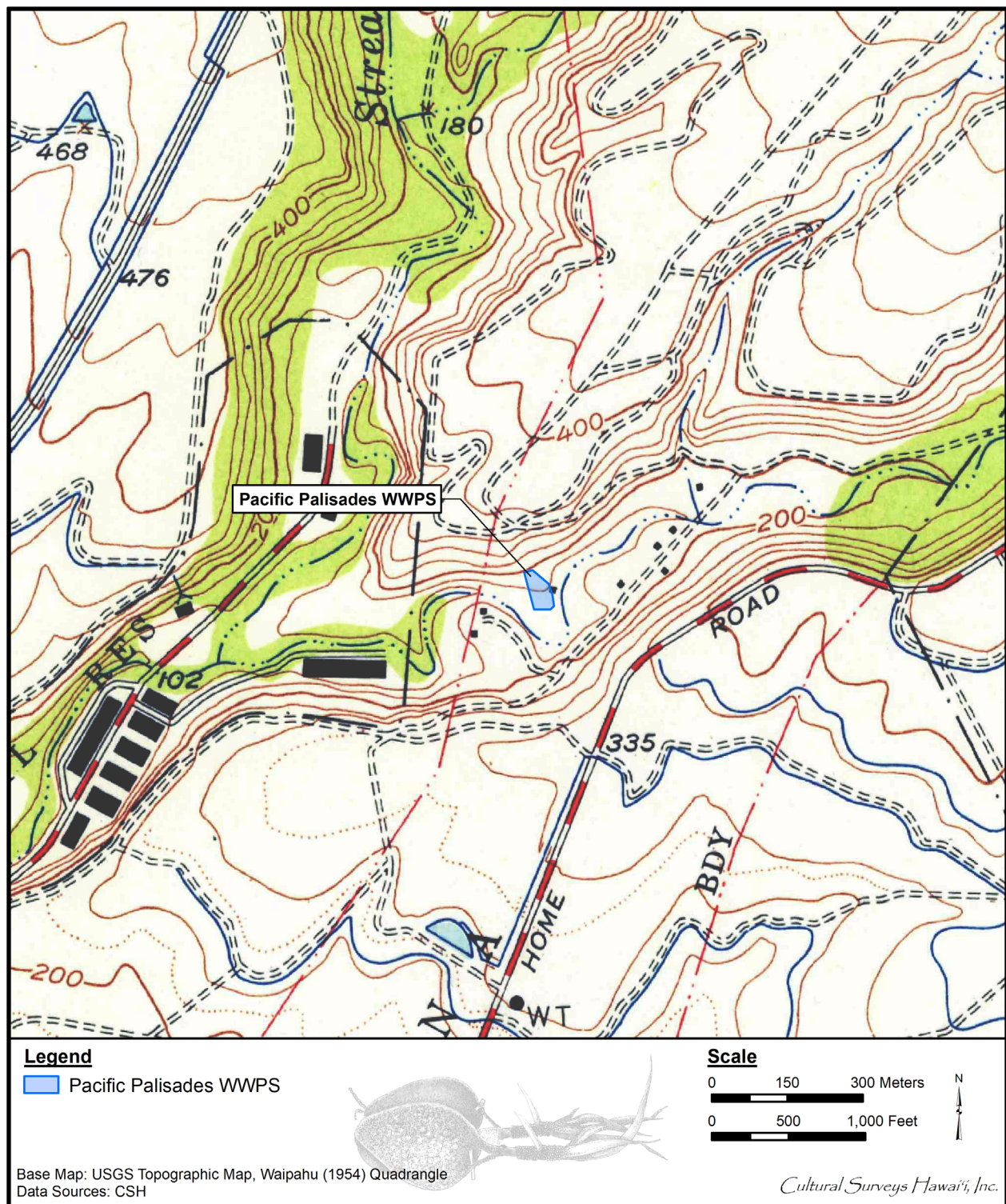


Figure 18. Portion of the 1954 Waipahu USGS topographic quadrangle showing the location of the Pacific Palisades WWPS



Figure 19. 1962 USDA aerial photograph (UH MAGIS) showing the project area indicating the southern portion of the campus was within Oahu Sugar Company commercial sugarcane fields while the vicinity of the Pacific Palisades WWPS was within a gulch

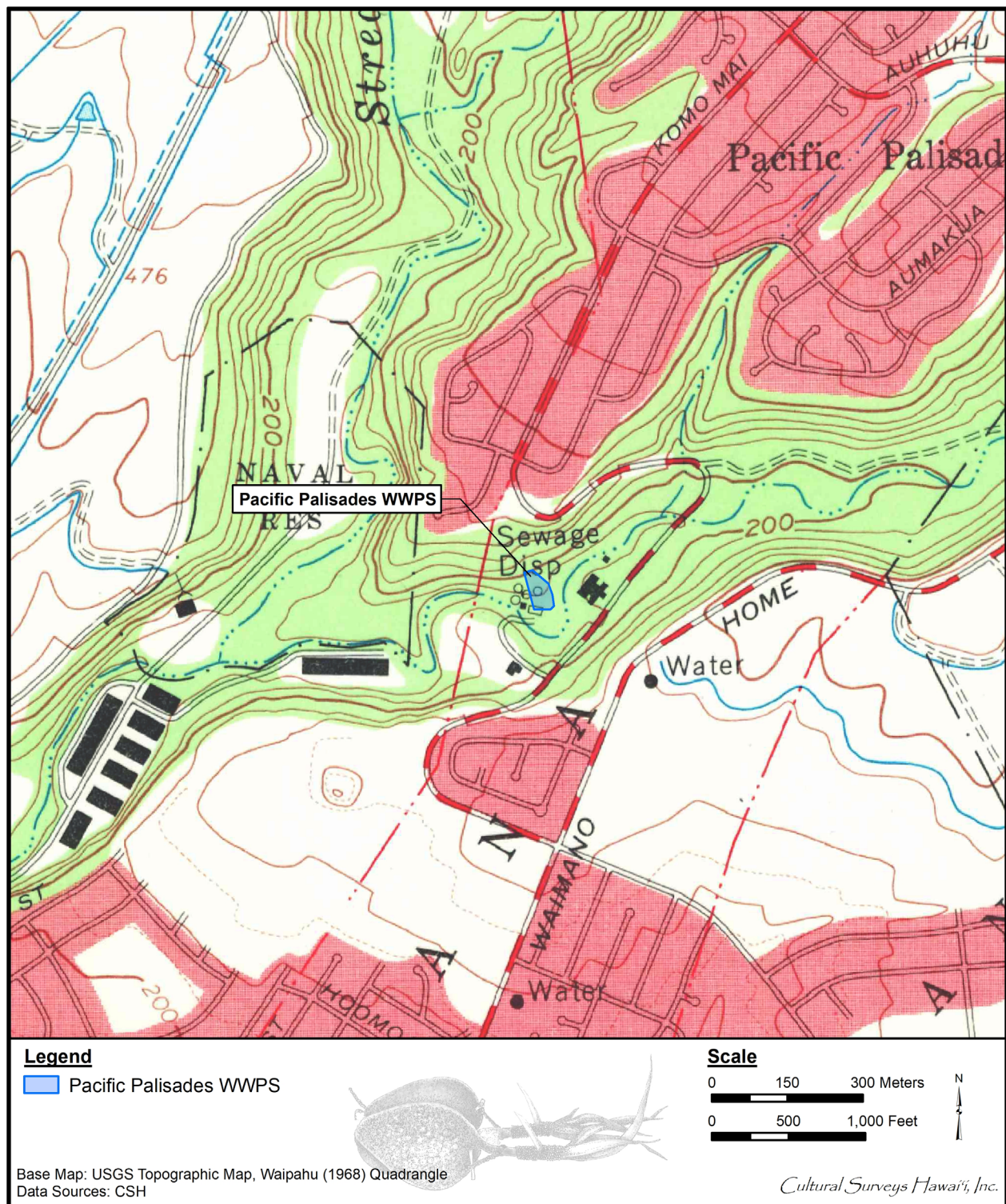


Figure 20. Portion of the 1968 Waipahu USGS topographic quadrangle showing the location of the Pacific Palisades WWPS



Figure 21. 1978 USGS orthophotoquad aerial photograph, Waipahu quadrangle showing the location of the Pacific Palisades WWPS

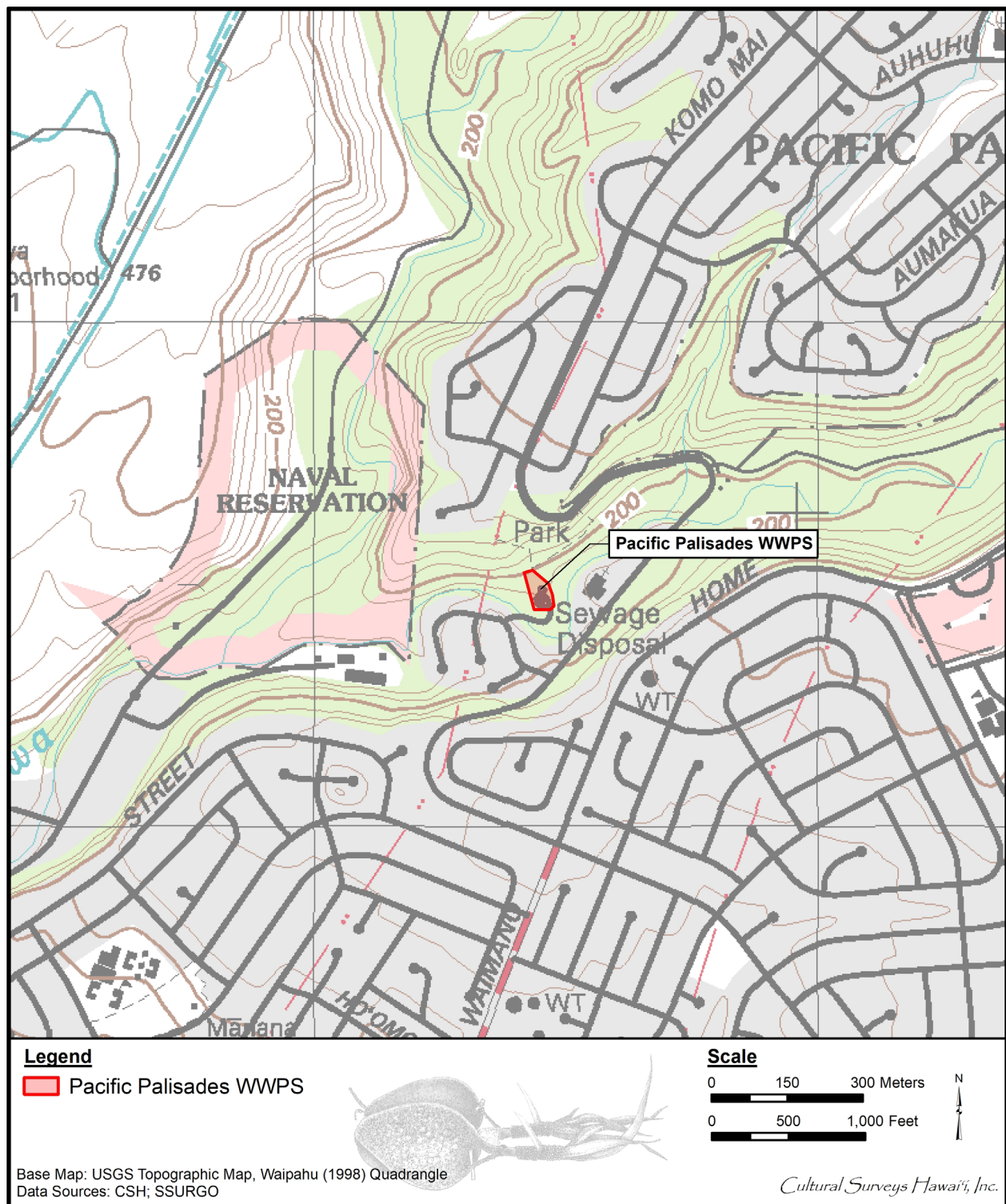


Figure 22. Portion of a 1998 Waipahu USGS 7.5-minute topographic quadrangle showing the location of the Pacific Palisades WWPS

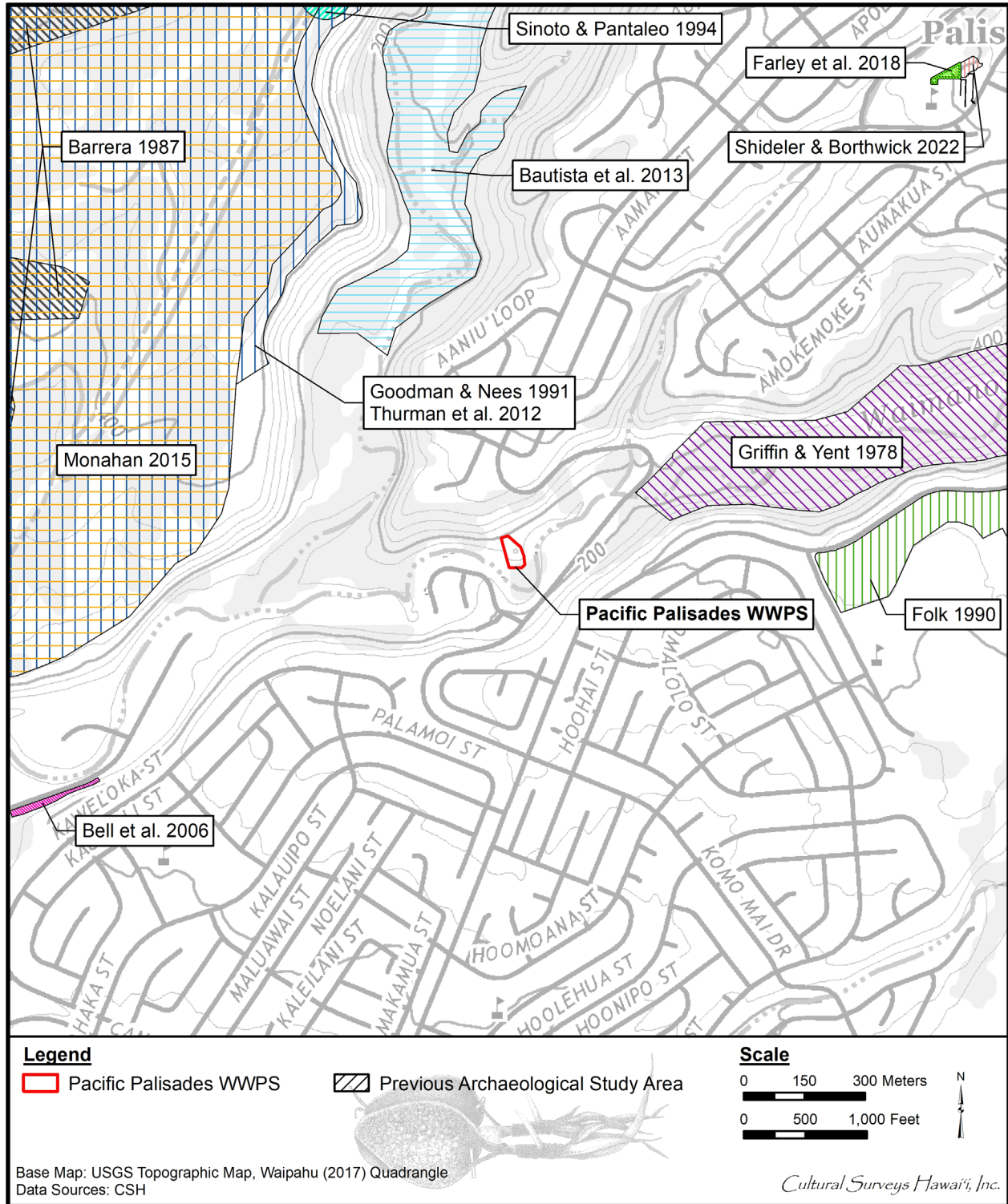


Figure 23. Previous archaeological studies within approximately 1.0 km of the Pacific Palisades WWPS on a 2017 Waipahu USGS topographic quadrangle base map

Table 1. Previous archaeological studies within approximately 1.0 km of the Pacific Palisades WWPS

Reference	Type of Study	Location	Results (SIHP # 50-80-09-)
McAllister 1933	Archaeological survey	Island-wide	Site 121, Puoiki Heiau in vicinity of current project area
Griffin and Yent 1978	Archaeological survey	Waimano Valley State Park	SIHP # -04105, agricultural complex
Barerra 1987	Archaeological survey	Waiawa ridge between 250-ft, and 700-ft elevation (1,242-acre proposed golf course)	Four historic properties identified: two basalt boulder alignments (SIHP # -01469); a historic dump site by a pineapple cannery (SIHP # -01470); remains of the pineapple cannery (SIHP # -01471); and former irrigator camp area associated with Oahu Sugar Co. (SIHP # -01472); none of these in vicinity of current project area
Folk 1990	Reconnaissance survey	Waimano Training School and Hospital	Historic cemetery, dressed stone irrigation ditch, and cache of loose, dressed stones (no SIHP #s assigned)
Goodman and Nees 1991	Archaeological reconnaissance and inventory surveys	3,600 acres in Waiawa Ahupua'a	Four pre-Contact sites found including complex of rock shelters with terraces and associated petroglyphs (SIHP # -02263), dated between AD 1460-1600; complex of six rock mounds (SIHP # -02265), dated between AD 1650-1955; aboriginal trail (SIHP # -02264); and lithic scatter (SIHP # -02262); documented evidence of post-Contact activities include remnants of extensive irrigation system, represented by 29 features and two main irrigation ditches (SIHP #s -02268 and -02269), road/railroad system, represented by 43 features, two camps, and cannery complex containing seven and three features respectively, and military reservation represented by four features
Sinoto and Pantaleo 1994	Archaeological data recovery	Testing at SIHP # -02262 at 500-ft, and SIHP # -02271 at 600-ft elevation on Waiawa ridge	Subsurface testing conducted at SIHP # -02262, a lithic scatter, and further historical research completed for SIHP # -02271, an historic Japanese cemetery

Reference	Type of Study	Location	Results (SIHP # 50-80-09-)
Bell et al. 2006	Field inspection and literature review	TMKs: (1) 9-6-007: por. 012 and 013	Documented a small terrace, identified along top of slope (no SIHP # assigned)
Thurman et al. 2012	Archaeological reconnaissance	1,680 acres of Kamehameha School lands in Waiawa Ahupua'a	Several previously identified sites revisited including SIHP #s -01470, -01471, -01472, -02262, -02263, -02264, -02270, -02271, -02272 and -02273; three sites newly documented (with temporary site numbers): CSH 1, traditional Hawaiian petroglyph site consisting of three images; CSH 2, possible rock shelter that requires additional investigation (subsurface testing); and CSH 3, traditional Hawaiian lithic quarry
Bautista et al. 2013	Archaeological reconnaissance	274-acre project area in Waiawa	Newly discovered 43 potential historic properties (provisionally designated CSH-1 to -43) with a wide variety of feature types including terraces, walls, overhangs, petroglyphs, mounds, a platform, a lava tube opening, enclosures, ditches, a railroad and likely associated berm, and a road
Monahan 2015	Archaeological inventory survey	1,395 acres of Kamehameha Schools' land in Waiawa and Waipi'o Ahupua'a	Documented three historic properties, all plantation-era sites dating from early to mid-20th century, consisting of 55 component features: 1) SIHP # -02270, network of roads and railroad rights-of-way (ROWs) consisting of 28 features; 2) SIHP # -02273, irrigation system consisting of 25 features; and 3) SIHP # -02271, remains of workers' camps consisting of two features
Farley et al. 2018	Literature review and field inspection	Portion of Palisades Elementary School	No historic properties identified, study included portion of present project fire lane and water line
Shideler and Borthwick 2022	Literature review and field inspection	Portion of Palisades Elementary School	No historic properties identified, notes Palisades Elementary School opened in 1965 and may be considered a historic property

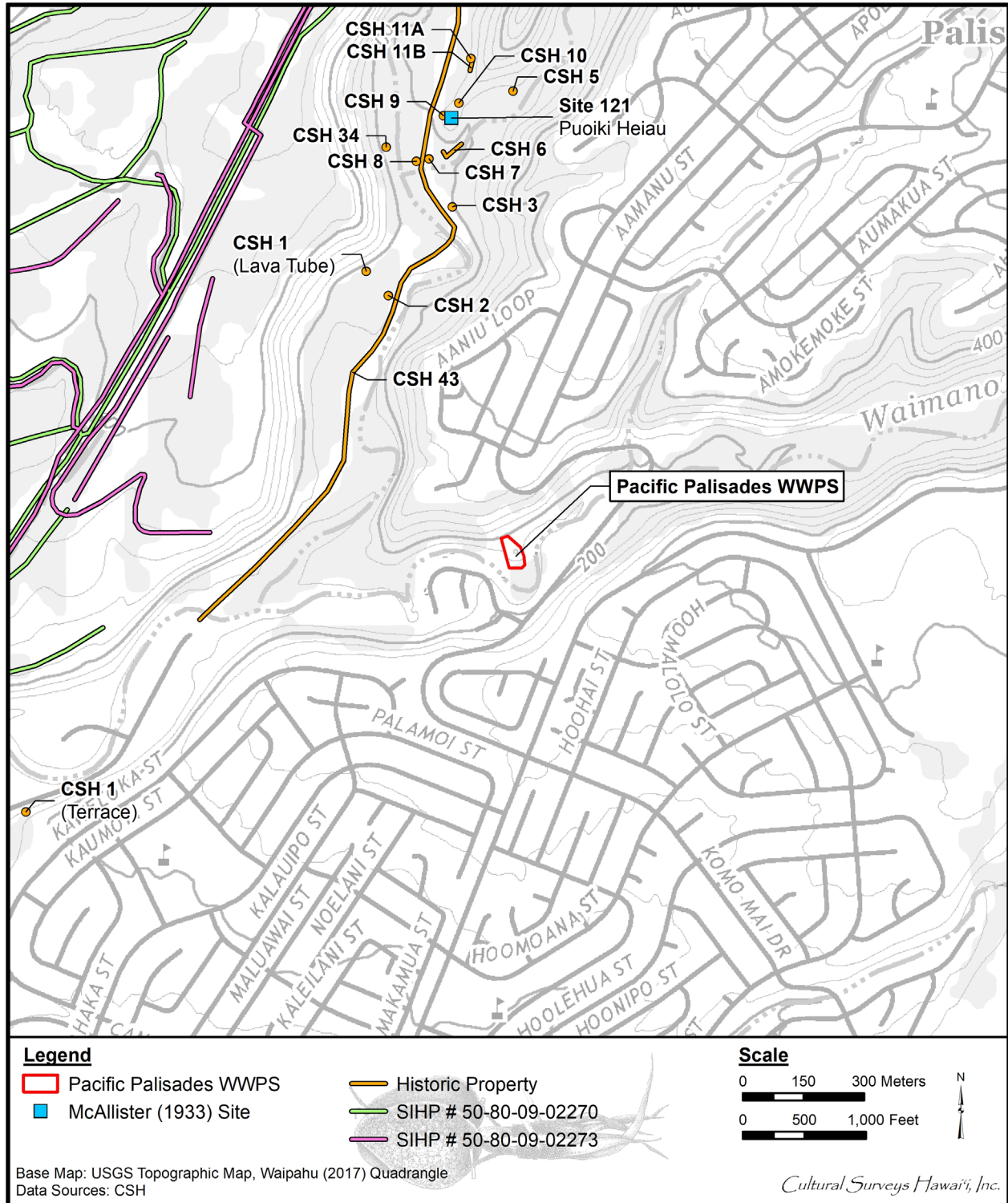


Figure 24. Previously identified historic properties within approximately 1.0 km of the Pacific Palisades WWPS on a 2017 Waipahu USGS topographic quadrangle base map

Table 2. Previously identified historic properties within approximately 1.0 km of the Pacific Palisades WWPS

SIHP # 50-80-09)	Type/Name	Description	Reference
Site 121	Puoiki Heiau	Destroyed by the time of McAllister's (1931) fieldwork	McAllister 1933
CSH 1 (to SW)	Terrace	A 6.5-meter long C-shaped terrace retaining an area upslope at least 3 meters perpendicular to the terrace, and constructed with unmodified cobbles stacked up against two large natural boulders	Bell et al. 2006
CSH 1 (to NW)	Lava tube (opening)	May represent a former outhouse. The feature is situated near the cliff face on the Waipahu side of Waiawa Stream. Debris scattered around the tube opening indicate the possible presence of a structure that has been bulldozed. The tube opening is small, measuring less than a meter in circumference and approximately 1.75 m deep.	Bautista et al. 2013
CSH 2	Circular alignment	Single course of stones that form a circle which may represent a fire ring or planting ring. The feature is situated in Mr. Ornellas' former horse pasture. No charcoal was observed. The feature measures 2.50 m (east/west [E/W]) by 3.0 m (north/south [N/S]).	Bautista et al. 2013
CSH 3	Terrace	Remnant terrace wall constructed of stones piled up to two courses high. The remnant measures 4 m long (N/S) by 1 m wide (E/W).	Bautista et al. 2013
CSH 5	Terrace	Remnant terrace wall constructed of stones piled two to four courses high. The remnant measures 6 m long (E/W) by 1.5 m wide (N/S).	Bautista et al. 2013
CSH 6	Wall	Large "L" shaped stone wall that may represent the corner of an enclosure. The feature is constructed of medium and large boulders stacked three to four courses high. The wall measures approximately 15 m in length and up to 1.0 m wide.	Bautista et al. 2013
CSH 7	Terrace	Square-shaped terrace constructed along the northern bank of Mānana Stream. The feature measures 4.0 m (E/W) by 3.5 m (N/S). This feature is in excellent condition with two to four courses of neatly stacked and faced stones. The surface of the terrace is level.	Bautista et al. 2013

SIHP # 50-80-09)	Type/Name	Description	Reference
CSH 8	Terrace/wall	Large stone terrace or reinforcing wall on the northern bank of Mānana Stream at the concrete bridge and road crossing. The feature is constructed of medium and large boulders neatly stacked three to six courses high. The wall measures 12 m long (E/W) by 1.5-2.0 m wide (N/S).	Bautista et al. 2013
CSH 9	Rock art	Panel of petroglyphs located at the base of the cliff face between Mānana and Waiawa streams. The rock art is comprised of at least seven anthropomorphic images: four are clearly pecked and one has been made by scratching a metal object.	Bautista et al. 2013
CSH 10	Wall	Long linear stone wall neatly stacked three to six courses high and faced. The wall trends along the ridge between Mānana and Waiawa streams. The wall may represent a boundary wall. Core filled architecture was noted.	Bautista et al. 2013
CSH 11A	Rock shelter	Feature A is a modified overhang on the cliff face representing a rock shelter. The interior dimensions of the overhang are approximately 2.5 m (N/S) by 2.1 m (E/W), with a maximum ceiling height of 1.3 m. The floor of the overhang is paved and level.	Bautista et al. 2013
CSH 11B	Wall	Feature B is a linear, dry-stacked wall located 1.5 m south of Feature A. The site is located along the cliff face on the Pearl City side of Waiawa Stream. The overall dimensions are 28 m (E/W) by 15 m (N/S).	Bautista et al. 2013
CSH 34	Terrace	Linear stone terrace wall. The terrace wall is stacked two to three courses high. It measures 7 m long by 1.5 m wide with heights of 40-65 cm. The feature is situated 15 m from Waiawa Stream.	Bautista et al. 2013

SIHP # 50-80-09)	Type/Name	Description	Reference
CSH 43	Road	Road extending toward the back of the valley. The road appears to largely follow the route of the former railroad and its construction likely obliterated much of that older feature. The road gets progressively worse as it extends back into the valley; it is unusable and for the most part hardly visible as it is overgrown in dense vegetation. A two- to three-inch layer of base course gravel is present over much of the original asphalt surface, though in some places small patches of asphalt were observed. The road utilizes several concrete bridge crossings over the river; only two of these crossings are still intact due to damage from flash floods. Retaining walls consisting of loosely piled, machine-moved boulders and other signs of disturbance were observed along the road corridor, possibly the result of initial road construction. Along the road there were areas that contained large amounts of modern debris and rubbish.	Bautista et al. 2013

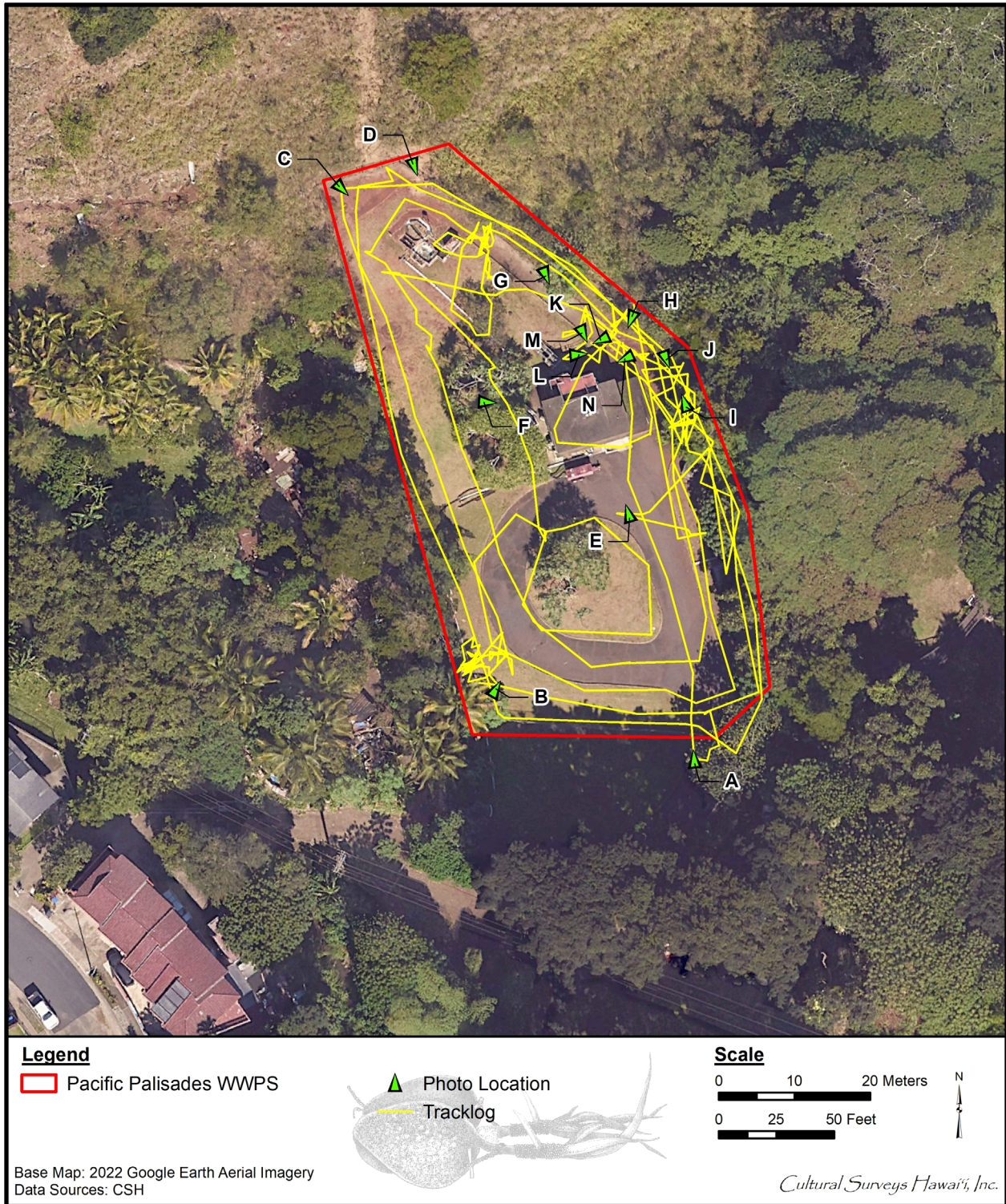


Figure 25. Archaeologist's track log and key to the following photographs (indicating their general location and orientation) within the Pacific Palisades WWPS on a 2022 Google Earth aerial photograph base map



Figure 26. Photo A: View of entry gate into the Pacific Palisades WWPS facility, view to northwest



Figure 27. Photo B: View from the southwest corner of the Pacific Palisades WWPS facility, view to northeast



Figure 28. Photo C: View from the northwest corner of the Pacific Palisades WWPS facility, view to southeast



Figure 29. Photo D: View from the northeast corner of the Pacific Palisades WWPS facility, view to south



Figure 30. Photo E: View of the front (southeast side) of the Pacific Palisades WWPS Pump Station building, view to northwest



Figure 31. Photo F: View of the southwest side of the Pacific Palisades WWPS Pump Station building, view to southeast



Figure 32. Photo G: View of the back (northwest side) of the Pacific Palisades WWPS Pump Station building, view to northwest



Figure 33. Photo H: View of the northeast side of the Pacific Palisades WWPS Pump Station building, view to southwest



Figure 34. Photo I: View of existing 1,000-gallon diesel UST, view to northwest



Figure 35. Photo J: View of existing 1,000-gallon diesel UST, view to southeast



Figure 36. Photo K: View of area for the proposed AST installation, view to southwest



Figure 37. Photo L: View of area for the proposed AST installation, view to northeast



Figure 38. Photo M: View of area for proposed fuel supply/return piping, view to southeast



Figure 39. Photo N: View of area for proposed fuel supply/return piping, view to west

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TOWNSCAPE, INC.

Environmental & Community Planning

900 Fort Street Mall Suite 1160 · Honolulu, HI 96813 · PH: (808) 536-6999 · FAX: (808) 524-4998 · www.townscapeinc.com

April 8, 2025

Subject: Early Consultation Request for Draft Environmental Assessment (DEA)
Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station –
Pearl City, Island of O‘ahu
Tax Map Key 9-7-091:071

Dear Participant,

On behalf of the City and County of Honolulu, Department of Environmental Services, Townscape, Inc. is preparing a DEA, pursuant to Hawai‘i Revised Statutes, Chapter 343, and Hawai‘i Administrative Rules (HAR), Chapter 11-200.1 for the Pacific Palisades Wastewater Pump Station Fuel Storage Tank Improvements (“Project”).

Pursuant to HAR, Chapter 11-200.1-18, the City’s Department of Environmental Services (Proposing Agency) is conducting early consultation to seek input from agencies, citizen groups, and individuals who may have an area of expertise, which may guide the scope and preparation of the DEA, and/or may be affected by the proposed Project. Please find enclosed an Early Consultation Handout with a project description and location map for your review and comment. We are requesting comments no later than **May 9, 2025** to be sent via mail or e-mail to:

Townscape, Inc.
Attn: Gabrielle Sham
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813
E-mail: gabrielle@townscapeinc.com

If we do not receive a response by this date, we will assume your agency or organization has no comments. Please contact the undersigned with any questions you may have at (808) 550-3894 or via e-mail at gabrielle@townscapeinc.com. Mahalo in advance for your participation in the early consultation for this Project.

Sincerely,

Gabrielle Sham
Associate Planner

Enclosure: Early Consultation Handout

Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station
Early Consultation Handout for Draft Environmental Assessment

Project Name	Fuel Storage Tank Improvements for the Pacific Palisades Pump Station
Proposing and Determining Agency	City and County of Honolulu, Department of Environmental Services 1000 Ulu'ōhi'a Street Suite 308 Honolulu, Hawai'i 96707
Agent	Townscape, Inc. 900 Fort Street Mall, Suite 1160 Honolulu, Hawai'i 96813 Phone: (808) 550-3894 E-mail: gabrielle@townscapeinc.com
HRS, Chapter 343 Trigger	Use of County lands and funds
Project Location	1810 Komo Mai Drive Pearl City, Hawai'i 96782
Tax Map Key & Recorded Fee Owner	(1) 9-7-091:071, City & County of Honolulu
Project Area	1.4385 acres (or 62,659 square feet)
State Land Use District	Urban
Development Plan	Primary Urban Center Development Plan
Special Management Area	Not in Special Management Area

Overview of Proposed Project

The Pacific Palisades Wastewater Pump Station (WWPS) has been in service since 1983. The proposed project involves replacing the existing underground fuel storage tank with a new 1,000-gallon aboveground fuel storage tank. Additionally, the project includes replacing the underground fuel piping, fuel monitoring panel, and all associated sensors, as well as connecting the new fuel monitoring panel to the supervisory control and data acquisition (SCADA) system. This work must be completed by July 15, 2028, in compliance with Hawai'i Administrative Rules 11-280.1, which mandates that all underground storage tanks and piping installed before August 9, 2013 to provide secondary containment and utilize interstitial monitoring. The aboveground storage tank will supply the fuel required for the emergency backup generator to service the WWPS.

Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station Early Consultation Handout for Draft Environmental Assessment



From: Beasley, Rachel E <rachel.e.beasley@hawaii.gov>

Sent: Thursday, April 17, 2025 9:07 AM

To: Gabrielle Sham <Gabrielle@townscapeinc.com>

Subject: OPSD Comments on 6 WWTP Projects

Hello Ms. Sham,

Please find attached OPSD comments the WWTP projects.

Please note that we have recently received your request for comments for the Pacific Palisades and Wahiawa WWTP. We will not be sending additional comments for these due to their similar nature.

Regards,

Rachel Beasley

Planner

Office of Planning and Sustainable Development

P.O. Box 2359

Honolulu, HI 96804-2359

808-587-2846 (main)

808-587-2878 (direct)



STATE OF HAWAII
OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT

Leiopapa A Kamehameha
235 South Beretania Street, 6th Floor · Honolulu, Hawaii · 96813
PO Box 2359 · Honolulu, Hawaii · 96804-2359
Phone (808) 587-2846 · Fax (808) 587-2824



**STATE OF HAWAII
OFFICE OF PLANNING
& SUSTAINABLE DEVELOPMENT**

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR

MARY ALICE EVANS
DIRECTOR

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

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

DTS202504011643HE

Coastal Zone
Management
Program

April 11, 2025

Environmental Review
Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented
Development

Statewide Geographic
Information System

Statewide
Sustainability Branch

Ms. Gabrielle Sham
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813

Dear Ms. Sham:

Subject: Early Consultation Environmental Assessment for the Proposed Fuel Storage Tank Improvements for the Lualualei Wastewater Pump Station at Waianae, Oahu; Tax Map Key (1) 8-7-007: 067

The Office of Planning and Sustainable Development (OPSD) is in receipt of your early consultation request, received April 1, 2025, on the preparation of an Environmental Assessment (EA), for the proposed fuel storage tank improvements for the Lualualei Wastewater Pump Station (WWPS).

The proposed project involves replacing the existing underground fuel storage tank with a new 2,000-gallon aboveground fuel storage tank. Additionally proposed is replacing the underground fuel piping, fuel monitoring panel, and all associated sensors. The aboveground storage tank will supply the fuel required for the emergency backup generator to service the WWPS. This project must be completed by July 15, 2028, the deadline set forth in Hawaii Administrative Rules (HAR) Section 11-280.1-21 that requires all underground storage tanks and piping installed before August 9, 2013, must be provided with secondary containment design.

The OPSD has reviewed the subject request and has the following comments to offer:

1. The EA shall discuss all triggers of the preparation of an EA set forth in Hawaii Revised Statutes (HRS) Chapter 343, and list all required permits and approvals from the state, federal, and county for the proposed fuel storage tank improvements.
2. The Hawaii Coastal Zone Management (CZM) Law, HRS Chapter 205A, requires all state and county agencies to enforce the CZM objectives and policies. The subject EA should include an assessment with mitigation measures, if needed, as to how the proposed project will conform to each of

Ms. Gabrielle Sham

April 11, 2025

Page 2

the CZM objectives and supporting policies set forth in HRS section 205A-2, as amended.

3. The project is located within the City and County of Honolulu's designated Special Management Area (SMA). The Department of Planning and Permitting, City and County of Honolulu, should be consulted for the SMA permitting requirements and shoreline setbacks. As the supporting document for the SMA permit application, the OPSD suggests that the EA discuss compliance with the requirements of SMA use and shoreline setbacks pursuant to the county SMA and shoreline ordinances.
4. The OPSD recommends that the site-specific Best Management Practices shall be developed and implemented to prevent any runoff, sediment, soil and debris potentially resulting from associated construction activities from adversely impacting the coastal ecosystems and the State waters as specified in HAR Chapter 11-54.
5. To assess potential impacts of coastal erosion and flooding due to sea level rise on the project area, the OPSD suggests the EA refer to the findings of the Hawaii Sea Level Rise Vulnerability and Adaptation Report, 2017 as well as its 2022 update and Guidance for Using the Sea Level Rise Exposure Area in Local Planning and Permitting Decisions: all documents may be found at <https://climate.hawaii.gov/hi-adaptation/state-sea-level-rise-resources/>.

If you respond to this comment letter, please include DTS202504011643HE in the subject line. For any questions regarding this letter, please contact Rachel Beasley of our office at (808) 587-2831 or by email at rachel.e.beasley@hawaii.gov.

Sincerely,

Mary Alice Evans

Mary Alice Evans
Director

JOSH GREEN, M.D.
GOVERNOR | KE IGAI'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION**

P.O. BOX 621
HONOLULU, HAWAII 96809

May 8, 2025

Townscape, Inc.
Attn: Gabrielle Sham
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813

via email: gabrielle@townscapeinc.com

SUBJECT: Early Consultation Request for Draft Environmental Assessment (DEA) Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station, TMK: (1) 9-7-091:071

Dear Ms. Sham:

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

Please find enclosed comments from the Engineering Division on the subject matter. Should you have any questions, please feel free to contact Dayna Vierra at (808) 587-0423 or email: dayna.k.vierra@hawaii.gov.

Sincerely,

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

Ian Hirokawa
Acting Land Administrator

Enclosure(s)

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

April 23, 2025

MEMORANDUM

FROM: ~~TO:~~

DLNR Agencies:

- ☐ Div. of Aquatic Resources
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- ☐ Div. of State Parks
- ☒ Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- ☐ Office of Conservation & Coastal Lands
- ☒ Land Division – O'ahu District (barry.w.cheung@hawaii.gov)
- ☒ Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

TO: ~~FROM:~~

FOR Russell Y. Tsuji, Land Administrator

A handwritten signature in black ink, appearing to be "Russell Y. Tsuji".

SUBJECT:

Early Consultation Request for Draft EA Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station

LOCATION:

Pearl City, Island of O'ahu; TMK: (1) 9-7-091:071

APPLICANT:

Townscape, Inc. on behalf of the City and County of Honolulu, Department of Environmental Services

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments to me by **May 7, 2025**.

If no response is received by this date, we will assume your agency has no comments. Should you have any questions about this request, please contact Dayna Vierra at dayna.k.vierra@hawaii.gov. Thank you.

BRIEF COMMENTS:

- () We have no objections.
- () We have no comments.
- () We have no additional comments.
- (✓) Comments are included/attached.

Signed:

A handwritten signature in black ink, appearing to be "Dina U. Lau".

Print Name:

Dina U. Lau, Acting Chief Engineer

Division:

Engineering Division

Date:

May 6, 2025

Attachments

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

LD/Russell Y. Tsuji

**Ref: Early Consultation Request for Draft EA Fuel Storage Tank Improvements
for the Pacific Palisades Wastewater Pump Station**

Location: Pearl City, Island of O‘ahu

TMK(s): (1) 9-7-091:071

**Applicant: Townscape, Inc. on behalf of the City and County of Honolulu,
Department of Environmental Services**

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 Special Flood Hazard Area (high-risk areas). Be advised that 44CFR, Chapter 1, Subchapter B, Part 60 reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible for researching the Flood Hazard Zone designation for the project. Flood zones subject to NFIP requirements are identified on FEMA’s Flood Insurance Rate Maps (FIRM). The official FIRMs can be accessed through FEMA’s Map Service Center (msc.fema.gov). Our Flood Hazard Assessment Tool (FHAT) (fhat.hawaii.gov) could also be used to research flood hazard information.

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

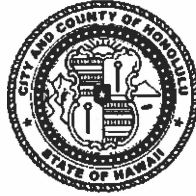
- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7139.
- Kauai: County of Kauai, Department of Public Works (808) 241-4849.

Signed: 
DINA U. LAU, ACTING CHIEF ENGINEER

Date: May 6, 2025

HONOLULU POLICE DEPARTMENT
KA 'OIHANA MĀKA'I O HONOLULU
CITY AND COUNTY OF HONOLULU
801 SOUTH BERETANIA STREET • HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 • WEBSITE: www.honolulupd.org

RICK BLANGIARDI
MAYOR
MEIA



ARTHUR J. LOGAN
CHIEF
KAHU MĀKA'I

KEITH K. HORIKAWA
RADE K. VANIC
DEPUTY CHIEFS
HOPE LUNA NUI MĀKA'I

OUR REFERENCE **EO-SH**

April 25, 2025

SENT VIA EMAIL

Ms. Gabrielle Sham
gabrielle@townscapeinc.com

Dear Ms. Sham:

This is in response to your correspondence dated April 8, 2025, requesting for comments on the Draft Environmental Assessment for the proposed City and County of Honolulu, Department of Environmental Services, Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station in Pearl City.

Based on the information provided, The Honolulu Police Department (HPD) recommends that all necessary lights, signs, barricades, and other safety equipment be installed and maintained by the contractor during the construction phase of the project. Additionally, adequate notification should be made to area businesses and residents prior to possible road closures, as any impact to pedestrian and/or vehicular traffic or construction-related debris could lead to complaints. Lastly, the HPD recommends a long-term plan to mitigate the tracking of dirt, gravel, and debris to minimize potential environmental impacts from all affected areas.

If there are any questions, please call Acting Major Denise Nakabayashi of District 3 (Pearl City) at (808) 723-8800.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glenn Hayashi", is written over a horizontal line.

GLENN HAYASHI
Assistant Chief of Police
Support Services Bureau

**BOARD OF WATER SUPPLY
KA 'OIHANA WAI
CITY AND COUNTY OF HONOLULU**

630 SOUTH BERETANIA STREET • HONOLULU, HAWAII 96843
Phone: (808) 748-5000 • www.boardofwatersupply.com

RICK BLANGIARDI
MAYOR
MEJA

ERNEST Y. W. LAU, P.E.
MANAGER AND CHIEF ENGINEER
MANAKIA A ME KAHU WILIKI

ERWIN KAWATA
DEPUTY MANAGER
HOPE MANAKIA



NĀ'ĀLEHU ANTHONY, Chair
JONATHAN KANESHIRO, Vice Chair
BRYAN P. ANDAYA
LANCE WILHELM
KĒHAULANI PU'U
EDWIN H. SNIFFEN, Ex-Officio
GENE C. ALBANO, P.E., Ex-Officio

April 28, 2025

Ms. Gabrielle Sham
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. Sham:

Subject: Your Letter Dated April 8, 2025 Requesting Comments on the Draft Environmental Assessment Early Consultation for the Proposed Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station at 1810 Komo Mai Drive in Pearl City, Tax Map Key: 9-7-091: 071

Thank you for your letter regarding the proposed replacement of the existing underground fuel storage tank with an aboveground fuel storage tank.

The existing water system is adequate to accommodate the proposed development. However, 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.

Water conservation measures are required for all proposed developments. These measures include utilization of nonpotable water for irrigation using rain catchment, drought tolerant plants, xeriscape landscaping, efficient irrigation systems, such as a drip system and moisture sensors, and the use of Water Sense labeled ultra-low flow water fixtures and toilets.

Ms. Gabrielle Sham
April 28, 2025
Page 2

The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.

The construction drawings should be submitted for our approval, and the construction schedule should be coordinated to minimize impact to the water system.

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 Daniel Koge, Project Review Branch of our Water Resources Division at (808) 748-5444.

Very truly yours,



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



DEPARTMENT OF PLANNING AND PERMITTING
KA 'OIHANA HO'OLĀLĀ A ME NĀ PALAPALA 'AE
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041 • WEBSITE: honolulu.gov/dpp

RICK BLANGIARDI
MAYOR
ME/A



DAWN TAKEUCHI APUNA
DIRECTOR
PO'O

BRYAN GALLAGHER, P.E.
DEPUTY DIRECTOR
HOPE PO'O

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

April 28, 2025

2025/ELOG-690 (LK)

Ms. Gabrielle Sham
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawai'i 96813

Dear Ms. Sham:

SUBJECT: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Pacific Palisades Wastewater Pump Station
Improvements (Project)
1810 Komo Mai Drive – 'Ewa
Tax Map Key: 9-7-091: 071

This is in response to your letter, received April 10, 2024, requesting the Department of Planning and Permitting (DPP) provide comments on the upcoming Draft EA, as required under Chapter 343, Hawai'i Revised Statutes for the replacement of the existing underground fuel storage tank with a new 1,000-gallon aboveground storage tank. Additionally, the proposal also includes replacing the underground fuel piping, fuel monitoring panel, and all associated sensors, as well as connecting the new fuel monitoring panel to the supervisory control and data acquisition system. The subject parcel is 62,659 square feet and split-zoned between P-2 General Preservation District (P-2 District) and R-5 (R-5 District) Residential District. The DPP has the following comments that should be included in the Draft EA:

1. **Consistency with Long-Range Plans:** The Draft EA should address the proposed Project's consistency with the O'ahu General Plan and Primary Urban Center Development Plan. The Draft EA should address how the proposed Project is consistent, inconsistent, or implements each of the relevant statements from the respective plans.
2. **Compliance with the Land Use Ordinance (LUO):** The EA should ensure compliance with Revised Ordinances of Honolulu (ROH) Chapter 21, the LUO:

www.honolulu.gov/dpp/resources/ordinances.html

The EA should identify the Project's consistency with the development standards of the P-2 District and the R-5 District development standards and other applicable LUO regulations, including but not limited to the following:


- Maximum allowable heights and building area;
- Required yard and height setbacks;
- Parking, loading, and vehicular circulation and maneuvering areas;
- Impervious surface coverage; and
- Parking lot landscaping and landscape screening.

The Pacific Palisades Wastewater Pump Station Fuel Storage Tank Station is considered a public use and structure. The Project qualifies for a Zoning Waiver under ROH Section 21-2.130. In the case that any of the above-mentioned development standards are not met, a Zoning Waiver may be required. The Draft EA should state whether the Project will likely require a Zoning Waiver Permit.

3. Flood Zone: The Draft EA should identify the subject property's Zone as mapped by the Federal Emergency Management Agency and evaluate the proposed Project's compliance with the City's Flood Hazard Areas Ordinance (ROH Chapter 21A).
4. Alternatives: The Draft EA must include potential development alternatives and provide reasons why the proposed action is the most practical approach.

The DPP has no further comments at this time. We may have comments regarding the Draft EA when more detailed plans are provided. Should you have any other questions, please contact Lynne Kong, of the Zoning Regulations and Permits Branch, at (808) 768-8028 or via email at lynne.kong@honolulu.gov.

Very truly yours,


for Dawn Takeuchi Apuna
Director

**HONOLULU FIRE DEPARTMENT
KA 'OIHANA KINAI AHI O HONOLULU
CITY AND COUNTY OF HONOLULU**

636 SOUTH STREET • HONOLULU, HAWAII 96813
PHONE: (808) 723-7139 • FAX: (808) 723-7111 • WEBSITE: honolulu.gov

RICK BLANGIARDI
MAYOR
MEIA



SHELDON K. HAO
FIRE CHIEF
LUNA NUI KINAI AHI

JASON SAMALA
DEPUTY FIRE CHIEF
HOPE LUNA NUI KINAI AHI

April 30, 2025

Ms. Gabrielle Sham, Associate Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. Sham:

Subject: Early Consultation Request for Draft Environmental Assessment
Fuel Storage Tank Improvements for the Pacific Palisades Wastewater
Pump Station
Pearl City, Island of O'ahu
Tax Map Key: 9-7-091: 071

In response to your letter received on April 21, 2025, regarding the abovementioned subject, the Honolulu Fire Department (HFD) reviewed the submitted information and requires that this project follow all applicable codes in the Revised Ordinances of Honolulu Chapter 20 regarding Flammable and Combustible Liquid Storage Tanks.

The abovementioned provisions are required by the HFD and may necessitate that additional requirements be met as determined by other agencies.

Should you have questions, please contact Acting Battalion Chief Kaulana Kama of our Fire Prevention Bureau at 808-723-7152 or hfdspb1@honolulu.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "P-CHI", is written over the signature line.

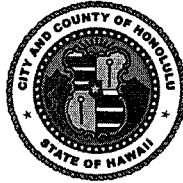
PAO-CHI HWANG
Acting Assistant Chief

PH/MD:sk

DEPARTMENT OF DESIGN AND CONSTRUCTION
KA 'OIHANA HAKULAU A ME KE KĀPILI
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8480 • FAX: (808) 768-4567 • WEBSITE: honolulu.gov

RICK BLANGIARDI
MAYOR
MEIA



HAKU MILLES, P.E.
DIRECTOR
PO'O

MARK YONAMINE, P.E.
DEPUTY DIRECTOR
HOPE PO'O

May 2, 2025

SENT VIA EMAIL

Ms. Gabrielle Sham
gabrielle@townscapeinc.com

Dear Ms. Sham:

Subject: Early Consultation Request for Draft Environmental Assessment (DEA)
Fuel Storage Tank Improvements for the Pacific Palisades
Wastewater Pump Station – Pearl City, Island of O'ahu
Tax Map Key 9-7-091:071

Thank you for the opportunity to review and comment. The Department of Design and Construction has no comments to offer at this time.

Should you have any questions, please contact me at (808) 768-8480.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Milles", is written over the printed name.

Haku Milles, P.E., LEED AP
Director

HM:cf (938653)

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

May 27, 2025

Townscape, Inc.
Attn: Gabrielle Sham
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813

via email: gabrielle@townscapeinc.com

SUBJECT: Early Consultation Request for Draft Environmental Assessment (DEA) Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station, located in Pearl City, Island of O'ahu, TMK: (1)9-7-091:071.

Dear Ms. Sham:

Thank you for the opportunity to review and comment on the subject matter. In addition to our previous comments dated May 8, 2025, enclosed are comments from the Division of Forestry and Wildlife on the subject matter. Should you have any questions, please feel free to contact Dayna Vierra at (808) 587-0423 or email: dayna.k.vierra@hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian C. Hirokawa".

Ian C. Hirokawa
Acting Land Administrator

Enclosure(s)

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT


STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

April 23, 2025

MEMORANDUM

FROM: **DLNR Agencies:**
____ Div. of Aquatic Resources
____ Div. of Boating & Ocean Recreation
X Engineering Division (DLNR.ENGR@hawaii.gov)
X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
____ Div. of State Parks
X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
____ Office of Conservation & Coastal Lands
X Land Division – O'ahu District (barry.w.cheung@hawaii.gov)
X Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

TO: FOR Russell Y. Tsuji, Land Administrator 

SUBJECT: Early Consultation Request for Draft EA Fuel Storage Tank Improvements for the Pacific Palisades Wastewater Pump Station

LOCATION: Pearl City, Island of O'ahu; TMK: (1) 9-7-091:071


APPLICANT: Townscape, Inc. on behalf of the City and County of Honolulu, Department of Environmental Services

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments to me by **May 7, 2025**.

If no response is received by this date, we will assume your agency has no comments. Should you have any questions about this request, please contact Dayna Vierra at dayna.k.vierra@hawaii.gov. Thank you.

BRIEF COMMENTS:

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

Signed: 
Print Name: JASON D. OMICK, Wildlife Prog. Mgr.
Division: Forestry and Wildlife
Date: May 20, 2025

Attachments

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

May 20, 2025

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
RYAN K.P. KANAKA'OLE
FIRST DEPUTY
CIARA W.K. KAHAHANE
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

Log no. 4984

MEMORANDUM

TO: IAN HIROKAWA, Acting Land Administrator
Land Division

FROM: JASON D. OMICK, Wildlife Program Manager
Division of Forestry and Wildlife

SUBJECT: Early Consultation Request for Draft EA for Fuel Storage Tank
Improvements for the Pacific Palisades Wastewater Pump Station;
Pearl City, O'ahu; TMK: (1) 9-7-091:071

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your early consultation request regarding the proposed fuel storage tank improvements for the Pacific Palisades Pump Station located at 1810 Komo Mai Drive, Pearl City, O'ahu, within TMK: (1) 9-7-091:071. The proposed project involves replacing the existing underground fuel storage tank at the Pacific Palisades Wastewater Pump Station (WWPS) with a new 1,000-gallon aboveground fuel storage tank. Additionally, the project includes replacing the underground fuel piping, fuel monitoring panel, and all associated sensors, as well as connecting the new fuel monitoring panel to the supervisory control and data acquisition system. This work must be completed by July 15, 2028, in compliance with Hawai'i Administrative Rules 11-280.1, which mandates that all underground storage tanks and piping installed before August 9, 2013, to provide secondary containment and utilize interstitial monitoring. The aboveground storage tank will supply the fuel required for the emergency backup generator to service the WWPS. The proposed project location is within State Land Use District Urban and is not within in the Special Management Area.

DOFAW provides the following additional comments regarding the potential for the proposed work to affect listed species in the vicinity of the project area.

The State listed 'ōpe'ape'a or Hawaiian hoary bat (*Lasiurus semotus*) could potentially occur at or in the vicinity of the project and may roost in nearby trees. Any required site clearing should be timed to avoid disturbance to bats during their birthing and pup rearing season (June 1 through September 15). During this period, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed.

Barbed wire should also be avoided in any construction as bats can become ensnared and killed by such fencing material during flight.

Artificial lighting can adversely impact seabirds which may pass through the area at night by causing them to become disoriented. This disorientation can result in seabird collision with manmade structures or the grounding of birds. For nighttime work that might be required, DOFAW recommends all lights used be fully shielded to minimize the attraction of seabirds. Nighttime work which requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15, when young seabirds make their maiden voyage to sea. If nighttime construction is required during the seabird fledgling season, we recommend a qualified biologist be present at the project site to monitor and assess the risk of seabirds being attracted or grounded due to the lighting. If seabirds are seen circling the area, lights should be turned off. If a downed seabird is detected, please follow DOFAW's recommended response protocol by visiting <https://dlnr.hawaii.gov/wildlife/seabird-fallout-season/>

Permanent lighting also poses a risk of seabird attraction, and as such should be minimized or eliminated to protect seabird flyways and preserve the night sky. For illustrations and guidance related to seabird-friendly light styles that also protect seabirds and the dark starry skies of Hawai'i please visit <https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf>.

The State endangered pueo or Hawaiian short-eared owl (*Asio flammeus sandwichensis*) could potentially occur in the project vicinity. Pueo are most active during dawn and dusk twilights. Remove and exclude non-native mammals such as mongoose, cats, dogs, and ungulates from the nesting area. Minimize habitat alterations and disturbance during pueo breeding season. These birds nest on the ground, and active nests have been found year-round. Before any potentially disturbing activities—like clearing vegetation, especially ground-based disturbance, DOFAW recommends a qualified biologist conduct surveys during crepuscular hours. Observation surveys should be done at those times from vantage points where they can see the whole project area for 2-3 nights before construction is to start. If any breeding displays are observed, it is likely there could be a nest. If pueo nests are detected in the area, a buffer zone should be established in which no activity occurs within a minimum buffer distance of 100 meters until the nesting cycle is complete, and the chicks are capable of flight. O'ahu Branch DOFAW staff should be notified at (808) 973-9778 of any nests or adult displayed breeding behavior.

We recommend that Best Management Practices are employed during and after construction to contain any soils and sediment with the purpose of preventing damage to near-shore waters and marine ecosystems.

We recommend consulting the O'ahu Invasive Species Committee (OISC) at (808) 266-7994 to help plan, design, and construct the project, learn of any high-risk invasive species in the area, and ways to mitigate their spread. Soil and plant material may contain detrimental fungal pathogens (like rapid 'ōhi'a death), vertebrate and invertebrate pests (e.g. little fire ants, and coconut rhinoceros beetle), or invasive plant propagules (e.g. albizia, pampas grass, fireweed, etc.) that will harm our native ecosystems, and the unique native found within them. Therefore, DOFAW advances the

guidance that all equipment and personal items—to include clothing and foot ware should be cleaned of excess soil and debris to minimize the risk of spreading invasive species. Additionally, DOFAW recommends minimizing the movement of plant or soil material between worksites. Suspect pests should be reported through the statewide pest hotline. Photos, videos, and locations can be shared at www.643pest.org or call: 743-PEST. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.

To prevent the spread of rapid 'ōhi'a death (ROD), DOFAW requests that removal, pruning/trimming, and potentially injury to 'ōhi'a trees be avoided as much as possible. Wounds serve as entry points for ROD fungus and increase the odds that the tree will be infected and die. Also, clean gear/tools, clothes, footwear, and vehicles before and after use. Make sure to removal all loose soil from the aforementioned items, spray gear/tools with 70% rubbing alcohol, and wash clothes with hot water and soap. Wash tires and undercarriages of all vehicles/machinery with a high-pressure water source. If 'ōhi'a trees must be removed or pruned/trimmed, please conduct these activities on a still day to minimize blown sawdust and use a sharp saw to create chips rather than dust. Seal all wounds to these trees with a stump seal product (e.g. Spectricide, etc.). For more information, please consult <https://cms.ctahr.hawaii.edu/rod>.

The invasive coconut rhinoceros beetle (*Oryctes rhinoceros*) or CRB is widespread on the island of O'ahu. CRB have been detected on other islands with moderate infestation on Kaua'i, one incipient site on Hawai'i Island, and only one positive site on Maui in 2023. Hawai'i Department of Agriculture interim rule 24-1 restricts the movement of CRB-host material from the island of O'ahu, which is defined as the Quarantine Area. Regulated material (host material or host plants) is considered a risk for potential CRB infestation. Host material for the beetle specifically includes 1) entire dead trees; 2) mulch, compost, trimmings, fruit and vegetative scraps, and 3) decaying stumps. CRB host plants include the live palm plants in the following genera: *Washingtonia*, *Livistona*, and *Pritchardia* (all commonly known as fan palms), *Cocos* (coconut palms), *Phoenix* (date palms), and *Roystonea* (royal palms). When such material or these specific plants are moved there is a risk of spreading CRB because they may contain CRB in any life stage. Inspection and/or treatment approved by HDOA is mandatory before inter-island transport. For more information regarding CRB, please visit <https://dlnr.hawaii.gov/hisc/info/invasive-species-profiles/coconut-rhinoceros-beetle/>.

You should avoid importing to O'ahu soil or other plant material from off-island. Soil and plant material may contain fungi (e.g., rapid 'ōhi'a death) and other pathogens which could harm our native species and ecosystems. We recommend consulting the Hawai'i Interagency Biosecurity Plan at <http://dlnr.hawaii.gov/hisc/plans/hibp/> in the planning, design, and construction of the project.

DOFAW recommends using native plant species for landscaping that are appropriate for the area; i.e., plants for which climate conditions are suitable for them to thrive, plants that historically occurred there, etc. Please do not plant invasive species. DOFAW also recommends referring to www.plantpono.org for guidance on the selection and evaluation of landscaping plants and to determine the potential invasiveness of plants proposed for use in the project.

Due to the arid climate and risks of wildfire to listed species, we recommend coordinating with the Hawai'i Wildfire Management Organization at (808) 850-0900 or admin@hawaiiwildfire.org, on how wildfire prevention can be addressed in the project area. When engaging in activities that have a high risk of starting a wildfire (i.e. welding in grass), it is recommended that you:

- Wet down the area before starting your task,
- Continuously wet down the area as needed,
- Have a fire extinguisher on hand, and
- In the event that your vision is impaired, (i.e. welding goggles) have a spotter to watch for fire starts.

Cats prey on native birds, including State-listed endangered waterbirds, seabirds, and forest birds. Predation is instinctive and means that even well-fed cats will hunt and kill wildlife. Therefore, DOFAW recommends no feeding of feral cats should occur on the premises.

We appreciate your efforts to work with our office for the conservation of our native species. These comments are general guidelines and should not be considered comprehensive for this site or project. It is the responsibility of the applicant to do their own due diligence to avoid any negative environmental impacts. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Kelli Yamaguchi, Protected Species Habitat Conservation Planning Associate via email at kelli.yamaguchi.researcher@hawaii.gov.

Sincerely,



JASON D. OMICK
Wildlife Program Manager