

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

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July 14, 2026

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IN REPLY REFER TO:
WEC.PE 26-055

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

Dear Ms. Evans:

SUBJECT: Ala Moana No. 1 Wastewater Pump Station - Fuel Storage Tank Improvements
Tax Map Key: 2-1-015:062
Honolulu, O'ahu

The City and County of Honolulu, Department of Environmental Services is transmitting the subject Final Environmental Assessment and Finding of No Significant Impact (FEA-FONSI) for the subject project. The FEA-FONSI 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 FEA-FONSI 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,

A handwritten signature in black ink, appearing to read "Roger Babcock, Jr.", is written over a digital signature line.

Digitally signed by
Babcock, Roger W
Date: 2026.07.14
18:04:53 -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, July 15, 2026 4:20:37 PM

Action Name

Fuel Storage Tank Improvements Ala Moana No.1 Wastewater Pump Station

Type of Document/Determination

Final environmental assessment and finding of no significant impact (FEA-FONSI)

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) 2-1-015:062

Action type

Agency

Other required permits and approvals

SMA, HCDA Rules Clearance

Proposing/determining agency

Department of Environmental Services

Agency jurisdiction

City and County of Honolulu

Agency contact name

Audrey Uyema Pak

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

Is there a consultant for this action?

Yes

Consultant

Townscape, Inc.

Consultant contact name

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Action summary

The Ala Moana Wastewater Pump Station (WWPS) consists of two facilities: Ala Moana No.1 WWPS, which has been in operation since 1953, and Ala Moana No.2 WWPS, which has been in operation since 1983. The Ala Moana No.1 WWPS 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.

Due to ongoing failures and 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 10,000-gallon underground fuel storage tank with a new 10,000-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)

- [Ala-Moana-No.1-WWPS-Final-EA- July-2026_To_ERP_ADA.pdf](#)
- [WEC.PE-Ala-Moana-No1-FEA-ADA.pdf](#)

Shapefile

- The location map for this Final EA is the same as the location map for the associated Draft EA.

Action location map

- [Project-Site.zip](#)

Compliance certification (HRS §368-1.5):

The authorized individual listed below certifies that documents submitted are unlocked, searchable, and compliant with the Hawaii Electronic Information Technology Disability Access Standards (including, but not limited to transcripts, captions, and other descriptions accompanying audio/video files). The individual acknowledges that the submitter retains the responsibility for compliance after documents have been published and any compliance queries will be directed back to the agency and/or applicant.

Authorized individual

Aaron Teper

Authorized individual email

aaron@townscapeinc.com

Authorized individual phone

(808) 550-3893

Authorization

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

**Final Environmental Assessment
for the
Fuel Storage Tank Improvements
Ala Moana No.1 Wastewater Pump Station
in Honolulu, 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

July 2026

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**Final Environmental Assessment
Fuel Storage Tank Improvements
Ala Moana No.1 Wastewater Pump Station
in Honolulu,
Island of O‘ahu, Hawai‘i**

Tax Map Key (1) 2-1-015:062

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
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July 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
BWS	Board of Water Supply
CSH	Cultural Surveys Hawai'i, Inc.
DLNR	Department of Land and Natural Resources
DP	Development Plan
EA	Environmental Assessment
FONSI	Finding of No Significant Impact
HAR	Hawai'i Administrative Rules
HCDA	Hawai'i Community Development Authority
HDOT	Hawai'i Department of Transportation
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
KCDD	Kaka'ako Community Development District
kW	Kilowatt
LUO	Land Use Ordinance
MCC	Motor Control Center
MGD	Million gallons per day
MUZ	Makai Urban Zone
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 Ala Moana No.1 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:	Honolulu, O'ahu, Hawai'i
Tax Map Key:	(1) 2-1-015:062
Project Address:	210 Keawe Street Honolulu, HI 96813
Land Area:	1.215 acres (or 52,925 square feet) parcel area
Recorded Fee Owner:	State of Hawai'i, leased to the City and 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	Kaka'ako Community Development District
Special Management Area:	In a Special Management Area
Proposed Action:	The proposed project involves replacing the existing underground fuel storage tank that serves Ala Moana No.1 WWPS with a new 10,000-gallon aboveground fuel storage tank. Additionally, the project includes replacing the existing underground fuel piping, fuel monitoring panel, and all associated sensors, as well as connecting the new fuel monitoring panel to the SCADA system.
Agency Determination:	Finding of No Significant Impact

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1. SETTING AND PROJECT DESCRIPTION

1.1. Background and Need

The Ala Moana Wastewater Pump Station (WWPS) consists of two facilities: Ala Moana No.1 WWPS, which has been in operation since 1953, and Ala Moana No.2 WWPS, which has been in operation since 1983. Ownership of the site rests with the State, while operations of the WWPS are managed by the City and County of Honolulu (City) through a long-term lease. Serving approximately 9,220 tributary acres, the Ala Moana WWPS collects sewage from four upstream WWPSs and supports surrounding residential, commercial, and industrial areas.

The Ala Moana WWPS includes two underground storage tanks (UST), one serving each pump station. These USTs store fuel for the standby generators, which automatically activate during power outages and provide full operational power to each pump station, including sewage pumps, support equipment, and lighting. Currently, the UST serving the Ala Moana No.1 WWPS is no longer operational, and backup power for that facility is reliant on the UST originally intended to serve the Ala Moana No.2 WWPS.

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 serving the Ala Moana No.1 WWPS alongside 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 the 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, helping 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

Due to ongoing failures of the current system and in compliance with HAR 11-280.1, the proposed project includes replacing the existing UST and piping serving the Ala Moana No.1 WWPS with a new 10,000-gallon aboveground storage tank (AST). The project will replace the underground fuel piping, fuel monitoring panel, and all associated sensors. It will connect the new fuel monitoring panel to the supervisory control and data acquisition (SCADA) system.

1.3. Site Location and Description

The Ala Moana WWPS is located at 210 Keawe Street in the ahupua'a of Honolulu, on the island of O'ahu. Surrounding the Ala Moana WWPS are highly developed urban landscapes, including the Honolulu Harbor.

The Ala Moana WWPS parcel is approximately 1.215 acres (52,925 square feet). It is secured with a double drive gate and a six-foot tall chain-link fence with barbed wire around the perimeter. Vehicular access to the project site is via an asphalt driveway from Keawe Street and a concrete driveway located on Ilalo Street.

The State land use designation for the project site is Urban (see Figure 2), 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 within the Kaka'ako Community Development District (KCDD) (see Figure 3). While the KCDD is classified as Urban by the state and subject to the City's LUO, according to HRS §206E-31, the region is under the jurisdiction of the Hawai'i Community Development Authority (HCDA). Zoning rules and regulations within HCDA areas supersede those of the LUO, requiring compliance for all projects under their jurisdiction. HRS §206E-33 states that all development in the KCDD "shall result in a community which permits an appropriate land mixture of residential, commercial, industrial and other uses".

1.4. Existing Facility

1.4.1. Pump Station Description

This section is based on information described in the Draft Preliminary Engineering Report prepared by Okahara and Associates, Inc. (2025) and the Ala Moana Wastewater Pump Station #1 Operations Manual prepared by Fukunaga & Associates, Inc. (2020). An existing site plan for the WWPS facility is provided in Figure 4.

With an average design flow of 56.5 million gallons per day (mgd) and a peak flow of 189 mgd, the Ala Moana WWPS collects wastewater from four upstream WWPSs (Fort DeRussy, Moana Park, Beachwalk, and Kahala) in its service area via 78-inch, 30-inch, and 60-inch influent lines. The 78-inch influent line transfers sewer water to both the No.1 and No.2 WWPSs, while the 30- and 60-inch influent lines only transfer water to the No.2 WWPS. Sewer water from both WWPSs is then pumped to the Sand Island Wastewater Treatment Plant (WWTP) via a 60- and 78-inch force main, which can handle up to 185 mgd of sewer flow. If peak flow is reached, then a backup 60-inch force main running parallel to the main 60-inch force main will be activated. All three force mains attached to the Ala Moana WWPS are interconnected, allowing for both facilities on site to use either force mains.

The Ala Moana No.1 WWPS pump station building consists of three stories: a ground floor, an intermediate floor, and a pump floor. Additionally, the facility houses a wet well. Elevation on the ground floor is approximately 6.5 feet above mean sea level. The intermediate floor and pump floor are part of the substructure and have finished floor elevations above mean sea level of -4.0 feet and -20.8 feet, respectively. Some equipment pertinent to Ala Moana No.1 WWPS including the standby generator and UST are housed within the Ala Moana No.2 WWPS (see section 1.4.2).

1.4.2. Power and Fuel System

The Ala Moana WWPS facility has two backup power systems that detect HECO power outages. Each system is intended to support its designated WWPS (i.e., No.1 or No.2). The backup power systems have two main components: a standby generator and an automatic transfer controller.

The Ala Moana No.1 WWPS backup power system includes a 2000-kilowatt (kW) diesel standby generator, located in the generator room attached to Ala Moana No.2 WWPS. The fuel system for Ala Moana No.1 WWPS consists of a 250-gallon day tank and a 10,000-gallon, double-walled fiberglass UST located northwest of the Ala Moana No.2 WWPS generator room. 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 room. 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. Fuel piping to the Ala Moana No.1 WWPS UST has reportedly failed, indicating that the UST is currently offline, and operations have shifted to the Ala Moana No.2 WWPS UST.

The Ala Moana No.1 WWPS UST is approximately 4.5 feet below mean sea level at its invert. The UST is equipped with a sump leak sensor and a fuel inventory sensor.

Within Ala Moana No.2 WWPS, a fuel monitoring panel provides leak detection and tracks fuel levels via 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 standby generator. When utility power is restored, the ATS shifts the system back to regular HECO service.

1.4.3. Electrical and Monitoring Systems

Ala Moana No.1 WWPS is powered by a 3200A at 480V, three-phase, 3-wire switchgear located in its own electrical room. The switchgear serves all the sewage pumps, motor control centers (MCCs), compressors, and other loads for the No.1 WWPS, but does not feed the fuel monitoring panel or the day tank. A 4000A, 480V, 3-phase and 3-wire switchboard located in the electrical room of Ala Moana No.2 WWPS powers the day tank and fuel monitoring panel that serves the Ala Moana No.1 WWPS through two MCCs (MCC C and MCC D). This is due to the standby generator systems location within the Ala Moana No.2 WWPS facility.

The day tank is fed by MCC D a 225A, 480V 3-phase, 3-wire control center. Panel "2C" a 208Y/120V, 3-phase, 4-wire power panel, powered by MCC C in the Ala Moana No.2 WWPS feeds the fuel monitoring control panel for the Ala Moana No.1 WWPS.

The SCADA cabinet, located in the electrical room of Ala Moana No.1 WWPS, monitors signals from various equipment, including the fuel monitoring control panel. Connection to the day tank from the existing SCADA could not be confirmed during the field inspection.

1.5. Project Details

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

Civil

- 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 concrete pavement and crushed gravel surfaces.
- Install thirty-four concrete-filled steel pipe bollards to protect the new AST from vehicular traffic.

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 surface's incidental to scope, conforming to existing standard color palette.

Structural

- Install concrete pads for the new AST and new packaged pump set in the Generator Room. The AST requires 12-inch pedestals at the tank supports. The existing equipment pad in the generator room will be extended to accommodate the packaged pump set.
- Install new steps and handrail adjacent to the AST.

Mechanical

- Demolish and replace the existing 10,000-gallon UST with a new 10,000-gallon ConVault AST within a similar footprint.
- Replace the existing packaged pump set.
- Replace and reroute the existing fuel piping and day tank piping to the packaged pump set.
- Remove existing underground fuel supply and fuel return piping and install new aboveground (one-inch Type 316 Stainless Steel) and underground (2-inch FRP) fuel supply and return piping from the AST to the new day tank and packaged pump set. No new penetrations for fuel supply, return, and electrical conduits will be made.
- 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 WWPSs.
- Install interstitial monitor and inventory sensors to the AST and integrated with the fuel monitoring panel.
- Replace the day tank packaged pump set that includes two supply pumps and one return pump. Additionally, a new pump controlled will provide necessary communication between the pumps and day tank storage.
- Install fuel monitoring points to the day tank.
- 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.
- Power the new fuel monitoring panel from Panel 2C, as existing capacity is sufficient.
- Connect the new day tank to power Panel 2D as Panel 2D has enough capacity for the day tank.
- Install new SCADA connections for the fuel monitoring control panel and the day tank.
- Reuse existing ducts for the new connections to the SCADA cabinet.

Figure 1 Location and Vicinity Map

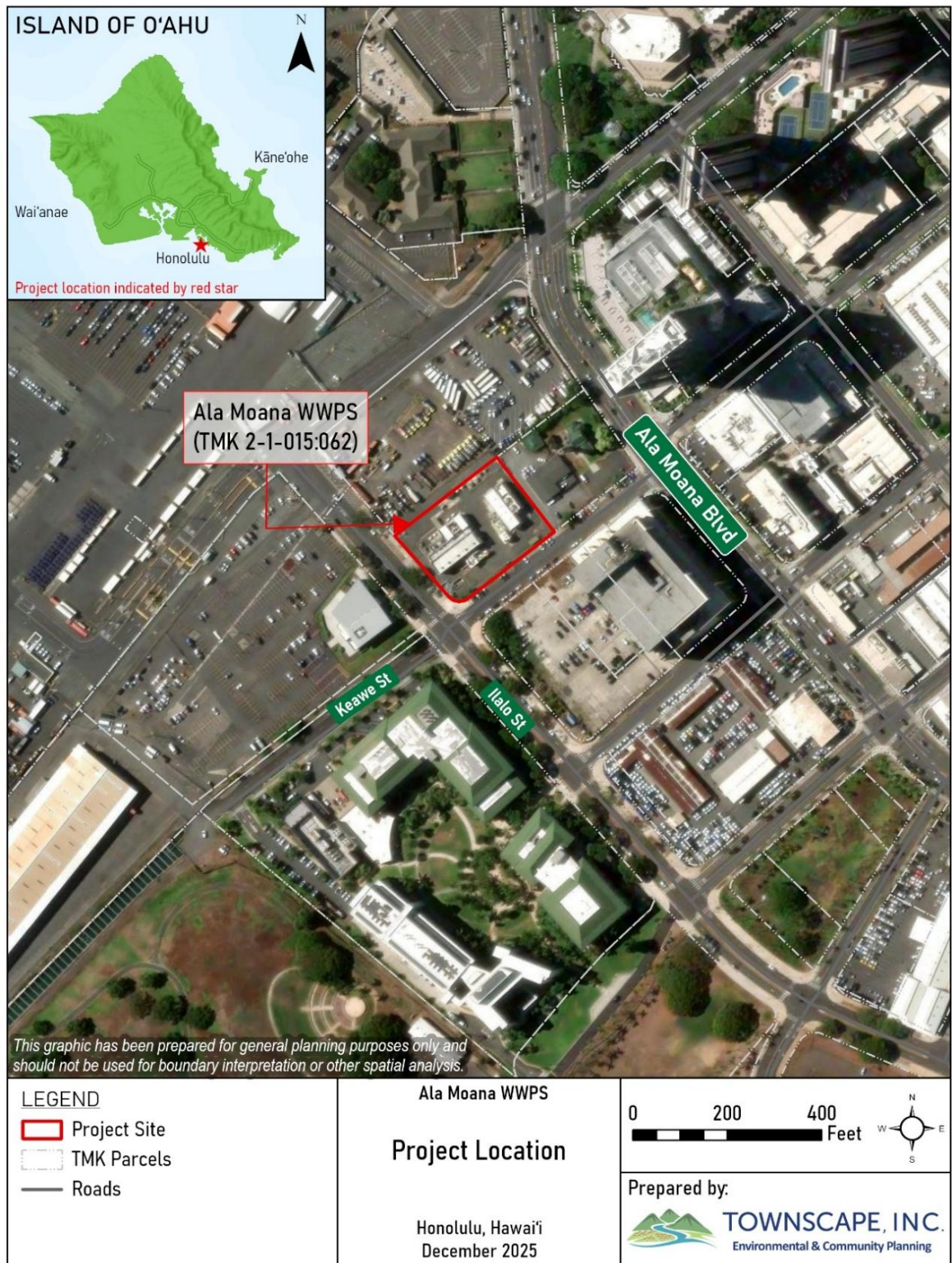


Figure 2 State Land Use Map

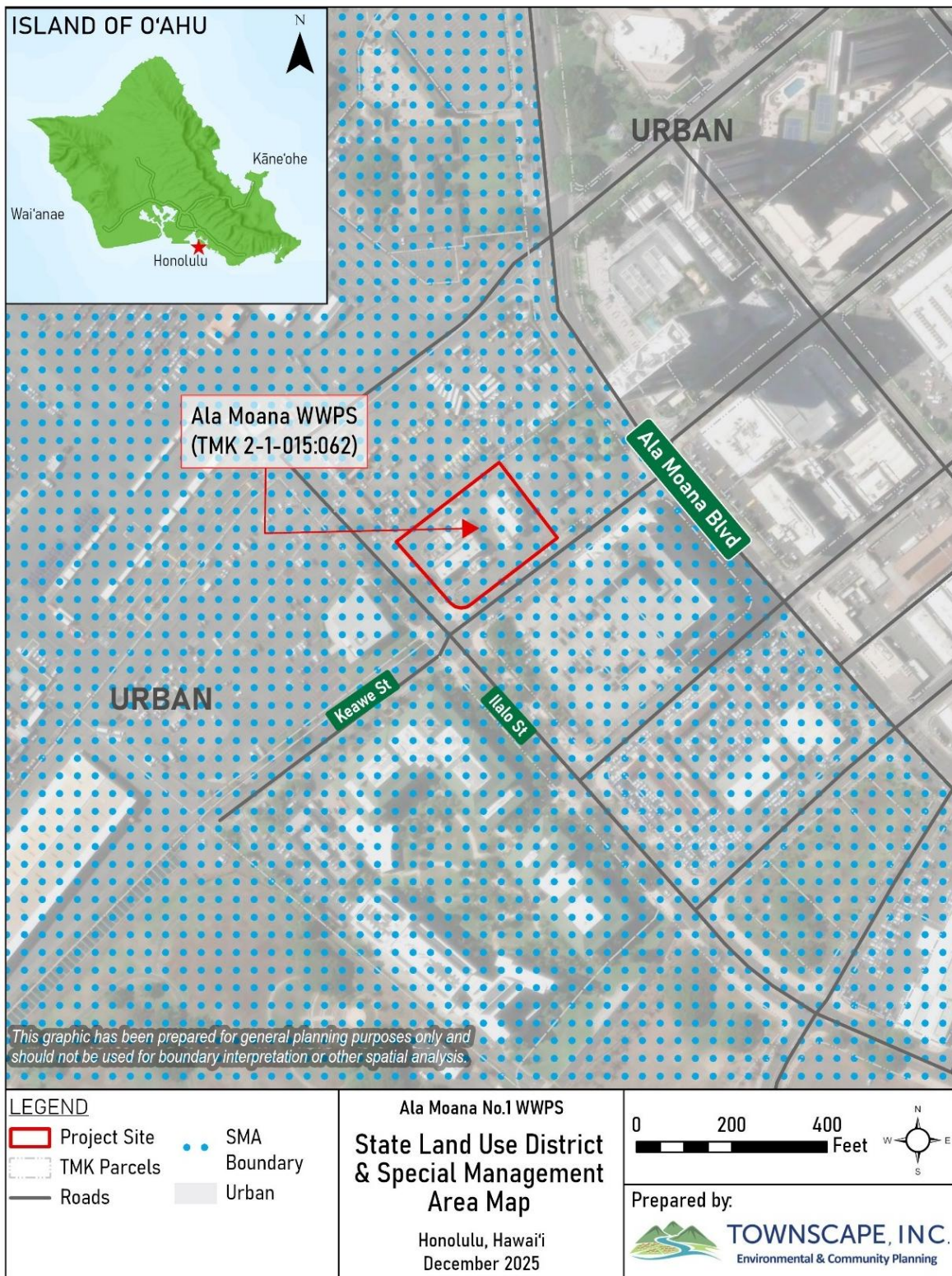


Figure 3 City and County Zoning

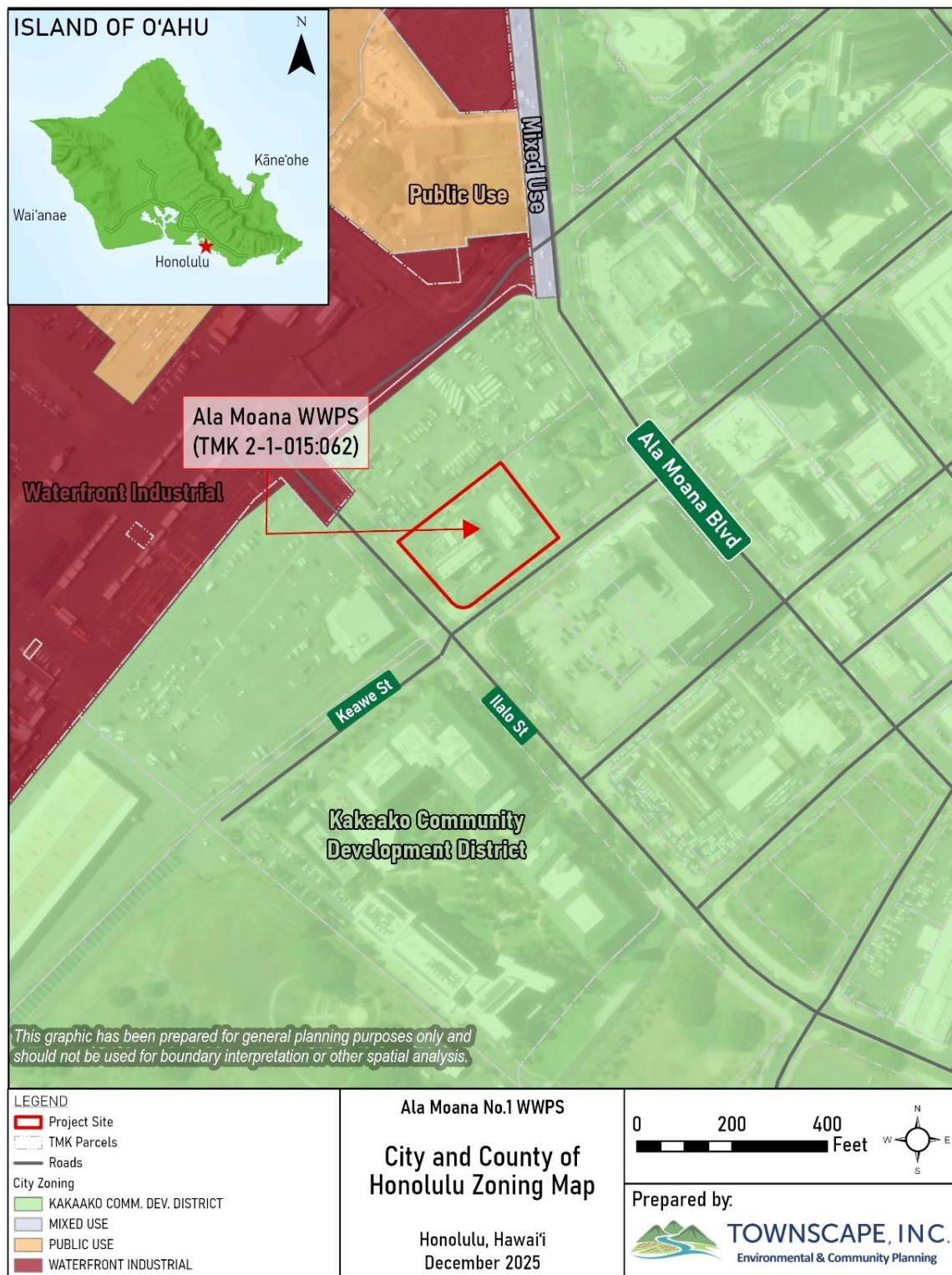
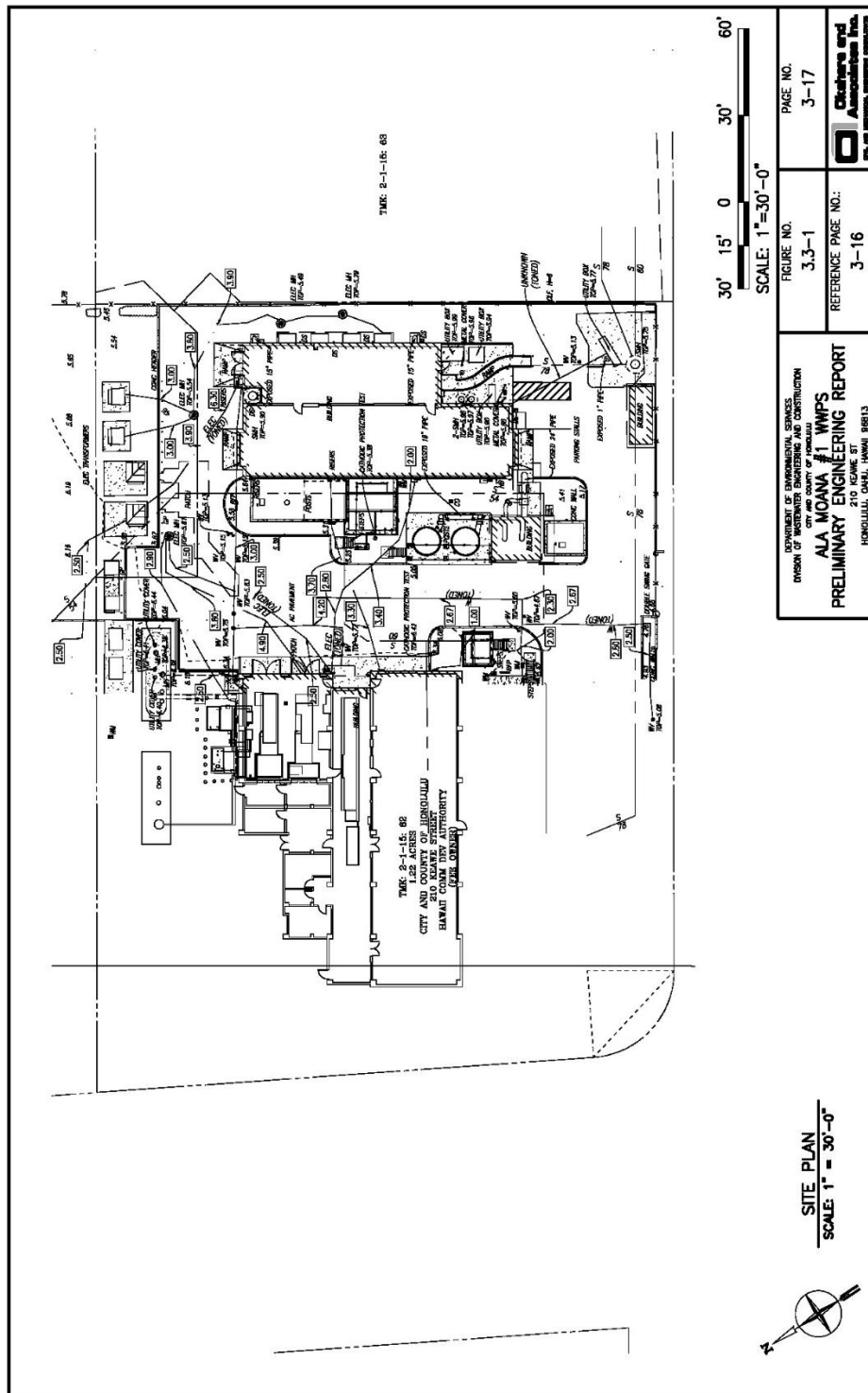
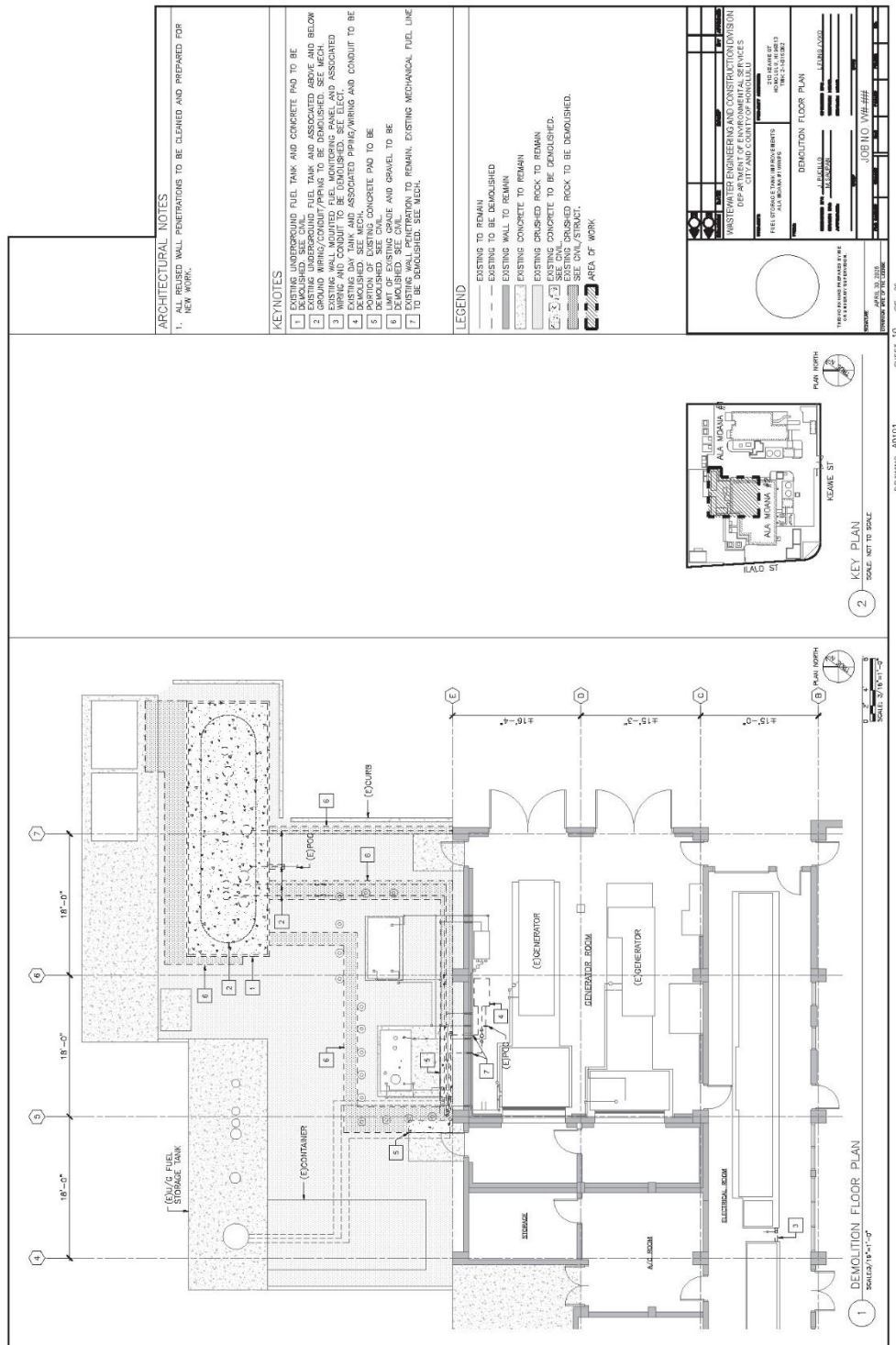


Figure 4 Existing Site Plan



Source: Okahara and Associates, Inc., 2025

Figure 6 Demolition Floor Plan



Source: Okahara and Associates, Inc., 2026

1.6. Project Schedule and Valuation

The project will be executed in multiple phases with other WWPSs, with construction expected to start in April 2027 for 12 months. The estimated project valuation is \$1,487,000.



View of the proposed location for the AST behind Ala Moana No.2 WWPS (Ala Moana No.1 WWPS is in the background)

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 widely depending on geographic conditions, elevation, and long-term climatic cycles.

Similarly to the rest of the State of Hawai'i, Kaka'ako, Honolulu, has a mild, semi-tropical climate. Rainfall in Kaka'ako is relatively low, as is typical of the coastal south shore of O'ahu. Most rainfall occurs between November and May, although heavy downpours are possible in other months. Average monthly temperature maximums reach the high 80s Fahrenheit during the summer season, and mid-70s Fahrenheit during the rainy season, while the average annual rainfall at the project site is approximately 25 inches (Longman et al., 2024; 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 southern coast of the Ko'olau range, the project site is approximately 16 feet above mean sea level. The project site is relatively flat, surrounded by flat terrain in Kaka'ako/Downtown Honolulu and is located near the Honolulu Harbor. The general site drainage pattern sheet flows from east to west across the site.

According to the United States Geological Survey, the site consists of surficial deposits of fill soil. The United States Department of Agriculture Natural Resource

Conservation Service data indicates that the soil is 65.9% Sandy, 15% Clay, and 19.1% Silt (Sandy Loam), with a 2% representative slope (U.S. Department of Agriculture, Soil Conservation Service, 1972).

Figure 10 depicts the soil classifications and topographic map.

Impacts and Mitigation Measures

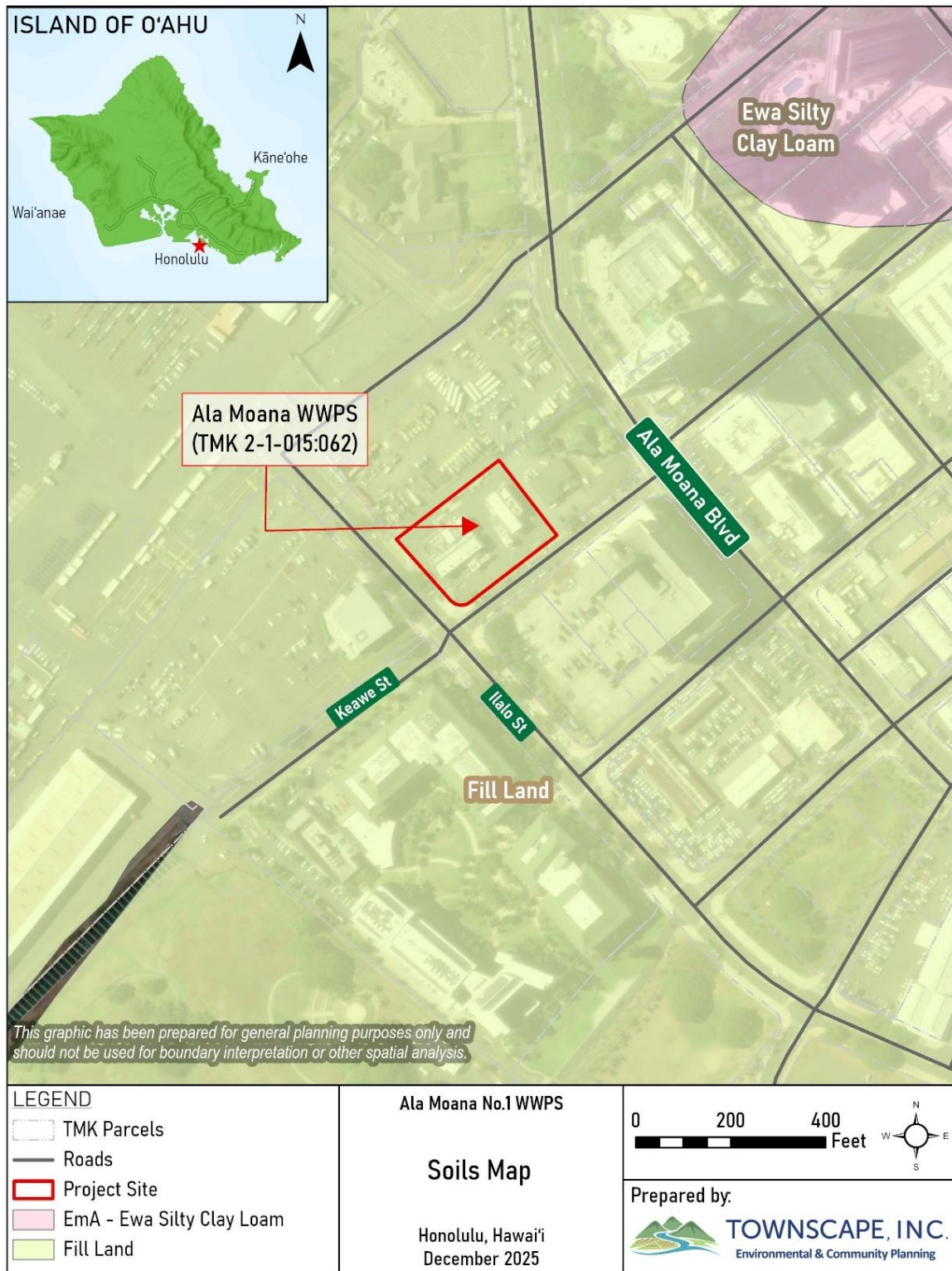
Project actions are expected to retain the overall topographic profile of the site. The project team will follow erosion and sediment measures to protect the project site and surrounding coastal environment in accordance with HRS 11-55 and the City and County of Honolulu Storm Water Best Management Practice Manual Construction Draft, dated August 2017. The following are erosion prevention and sediment control Best Management Practices (BMPs) that will be required by the Contractor to prevent runoff (see Figure 11):

- 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.
- Compost socks will be used as the main sediment barrier northeast of the AST installation site at the edge of the disturbance limit.

In an early consultation memorandum from the Division of Aquatic Resources (DAR), dated January 2, 2026, the following measures were recommended relating to erosion and land-based sources pollution:

- Implement erosion and sediment control measures such as silt fences, sediment traps, and erosion control blankets to minimize soil disturbance and sediment runoff during construction activities.
- Implement stormwater management practices, including retention ponds, vegetated swales, and permeable pavement to reduce stormwater runoff volume and pollutant loads.
- Monitor sedimentation and water quality parameters throughout the project and notify DAR if above-average amounts of sediment runoff.

Figure 10 Soils



2.1.3. Natural Hazards

Tsunami, Sea Level Rise, and Flooding

The Ala Moana No.1 WWPS project site is susceptible to impacts from tsunamis, sea level rise (SLR), and flooding. The project area is in an Extreme Tsunami Evacuation Zone, a region where evacuation is recommended since extensive damage to life and property may occur from seismic sea waves. Note that “extreme” refers to areas that would be impacted only by an extreme tsunami event, not an area of extreme risk for inundation.

According to the City’s projected SLR exposure tool, the western edge of the parcel may be impacted by 0.5-foot of SLR and annual high wave flooding by 2030. Due to the site’s low-lying nature and coastal proximity, the western corner and eastern section are projected to be impacted by 3.2-feet of SLR and annual high wave flooding by 2100. According to the Department of Land and Natural Resources (DLNR) Flood Hazard Assessment Tool (2025), the project site is located in Flood Zones AE (high-risk) and X (moderate risk). Flood Zone AE corresponds with areas subject to inundation by the 100-year flood. Base Flood Elevation for the site is 5 feet. See Figures 12 and 13 for more information on tsunamis, SLR, and flooding.

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.

Earthquakes

Earthquakes on O‘ahu are infrequent and typically low magnitude. O‘ahu does not sit on any major fault lines; however, the potential for earthquakes still exists. Three primary earth processes contribute to earthquakes on the Hawaiian Islands: volcanic activity, tectonic fault slippage, and mantle pressure resulting from the islands’ weight on the Earth’s crust (USGS, 2017). The FEMA National Risk Index assigns a “moderate high-risk” earthquake score to the Ala Moana No.1 WWPS census tract area.

Wildfires

Based on the region's historic wildfire record and low fire prone vegetation levels, the DLNR Division of Forestry and Wildlife Fire Management Program classifies the project area as having a low wildfire risk.

Impacts and Mitigation Measures

The threats to people and property from unpredictable natural events will always be present. The likelihood and potential severity of tsunami and hurricane-related impacts will be no greater than elsewhere in the region and the planned activities will not exacerbate their associated hazards.

Due to the project's location within a Special Flood Hazard Area, in Zone AE, a high-risk flood zone, the project will comply with the applicable requirements of the National Flood Insurance Program, as outlined in Title 44 of the Code of Federal Regulations. The bottom of the AST is required to be elevated to or above the FEMA Base Flood Elevation. In addition, the AST anchorage to the concrete pad must be designed to resist the hydrostatic and hydrodynamic loads, including buoyancy effects associated with the base flood.

Since the Base Flood Elevation is 5 feet, the bottom of the AST must be at or above elevation 5 feet. The existing grade at the lowest corner within the tank footprint is elevation 6 feet. Therefore, the concrete pad installed at existing grade with 12-inch pedestals at the tank supports will satisfy the elevation requirement.

Coastal hazards associated with 0.5 feet of SLR by 2030 and 3.2 feet of SLR by 2100 may impact areas near Keawe Street and the western edge of the project site; however, the AST installation will occur in the north/central area of the project site, which is not in the projected SLR exposure area. Additionally, the city acknowledges that long-term adaptation strategies, including elevated structures, and alternative foundations to protect key infrastructure on the site may be necessary as SLR continues to increase the threats associated with coastal hazards. Such planning is more appropriately addressed through future infrastructure planning efforts and capital improvement programs, rather than within the scope of this project, which is focused on maintaining the operability of existing wastewater infrastructure and meeting the July 15, 2028 regulatory deadline for underground storage tanks.

Figure 12 Flooding Hazards and Sea Level Rise

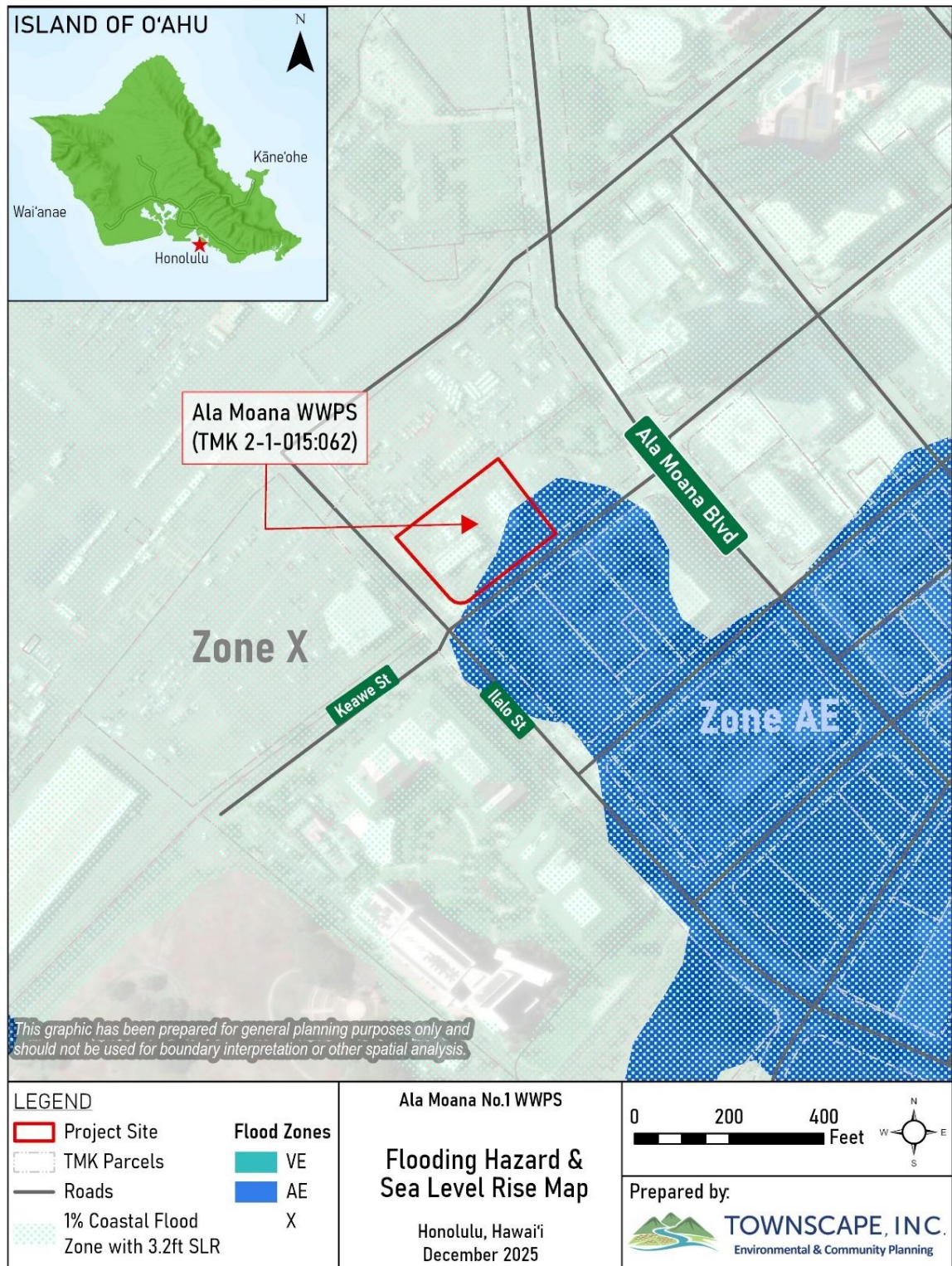
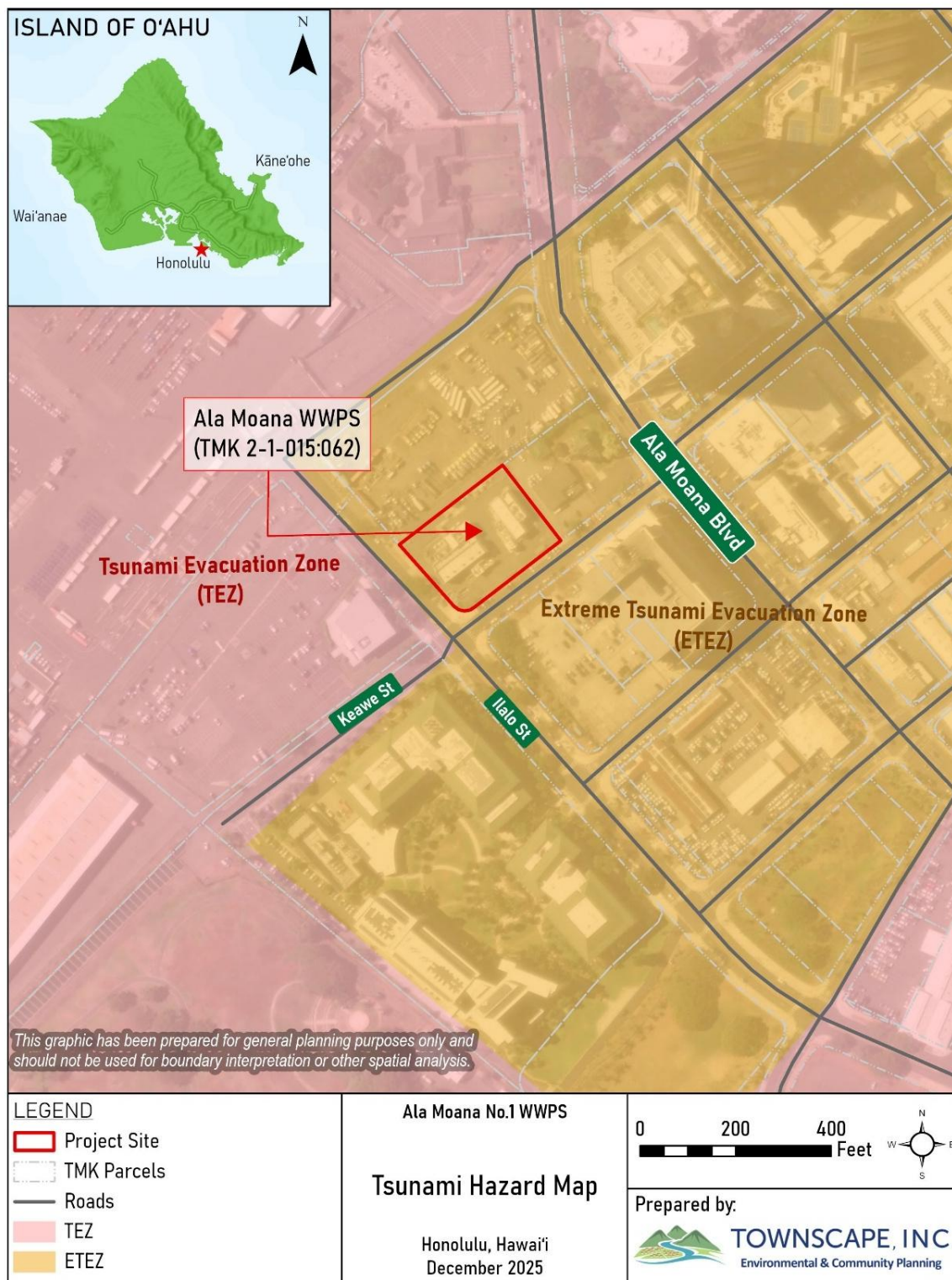


Figure 13 Tsunami Evacuation Zone



2.2. Archaeological and Architectural Resources

Archeologists with Cultural Surveys Hawai'i (CSH) conducted a field inspection on December 23, 2025, to assess the likelihood of historic properties within the project area. The field inspection confirmed that the project area is almost entirely paved and dominated by the two WWPS facilities. No historic archaeological resources were identified during the survey. To support an architectural review, special attention was given to the WWPS buildings, with the Ala Moana No.1 WWPS building being identified as a possible historic structure due to its age. Unless otherwise noted, the following information is summarized from the Literature and Field Inspection report prepared by CSH (see Appendix A).

The Ala Moana WWPS project site is situated in the makai portion of the ahupua'a of Honolulu, within the moku of Kona, on the island of O'ahu, in an area commonly known as Makai Kaka'ako. Almost all of Makai Kaka'ako is urbanized, built on fill land, with historical maps indicating that the area may have been infilled by 1891. It is reported that much of the fill activity appears to have been through the disposal of municipal garbage through open burning of trash. Prior to infilling, much of the area makai of Ala Moana Boulevard, including the project area, was made up of offshore shallow reef flats. The project area served as an important fishing and salt production region for ancient Hawaiians well into the Hawaiian Kingdom period. Aside from fishing and salt production, residential dwellings are not shown in the project area until the 20th century, when a large number of housing lots were awarded to commoners; the nearest being 500 meters mauka of the project site.

In the modern period, Makai Kaka'ako experienced rapid development coinciding with the growth of Honolulu and the adjacent harbor. As Honolulu urbanized and became the capital of the Hawaiian Kingdom, Kaka'ako transformed into a key industrial area to support the harbor and the city's growing development. From 1855 to 1902, Makai Kaka'ako was home to the historic Kaka'ako Salt Works (Sroat et al., 2023), helping to facilitate trade and increase domestic supply of this vital commodity (Bennicas et al., 2020). Following annexation, much of Makai Kaka'ako became military land supporting Fort Armstrong, a historic site, until the 1950s, when the base was put out of service. In 1953, the Ala Moana No.1 WWPS facility was constructed to support the growing neighborhoods of Ala Moana and Downtown Honolulu.

More than fifty previous archaeological studies have been conducted within Makai Kaka'ako, with several historic buildings identified in the region, as well as multiple burial sites. Historic buildings and burial sites have primarily been identified in areas outside the general vicinity of the Ala Moana WWPS, with known burial sites located

mauka of Ala Moana Boulevard. However, makai of the Ala Moana WWPS towards Kaka‘ako Water Front Park, facilities associated with the former military installations of Fort Armstrong (1909 – 1950s) have been identified (Blahut and Hammatt 2018). Furthermore, the historic Kaka‘ako Pumping Station, which is listed on the State and National Registers of Historic Places, borders the Ala Moana WWPS (Cummins 1973; Enanoria and Hammatt 2016). No previous archaeological studies have identified any historic or archaeological resources on the project site.

Impacts and Mitigation Measures

No impacts to existing archaeological or architectural resources are anticipated. The installation of the AST and removal of the existing UST 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.

Consultation with the State Historic Preservation Division (SHPD) was initiated via the submittal of the LRFI (see Appendix A) on April 28, 2026. The assigned Hawai‘i Cultural Resource Information System number is 2026PR00420. According to the review letter issued by SHPD on May 22, 2026, they concurred with ENV’s effect determination of “no historic properties affected”, which ended the historic preservation review process (see Appendix C).

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 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. Cultural Resources

Historically, the ahupua‘a of Honolulu had important mauka-to-makai cultural resources, from heiau and other religious structures to surfing and sporting games. Coastal areas were primarily used for fishing, surfing, canoeing, and burial sites. The shoreline was also home to significant fishponds and reef flats, in what is now Honolulu Harbor and Makai Kaka‘ako.

Many of the significant cultural resources in the makai areas of the ahupua'a of Honolulu have been lost to development and time. As Honolulu grew into the urban center of Hawai'i, ancient fishponds, beaches, burial sites, and lo'i were paved to make way for development. Traditional heiau were dismantled and built over with only archeological remnants remaining. Furthermore, the expansion of the Honolulu Harbor moved surfers and canoers towards Kaka'ako Waterfront Park, Sand Island, and Ala Moana Beach Park, away from traditional spots.

The Ala Moana No.1 WWPS is located in the makai area of the ahupua'a of Honolulu, and while it is highly developed, people continue to use the region for cultural practices, including surfing and fishing at the nearby Kaka'ako Waterfront Park.

To ascertain ethnographic information on the cultural significance of uses that occur in the general vicinity of the WWPS, consultation with SHPD was initiated on April 28, 2026. Additionally, on June 2, 2026, consultation letters were sent out to the Hawai'i Civic Club of Honolulu and the O'ahu Island Burial Council to gather information on cultural resources and practices in the area, and to seek referrals of individuals who have long-standing cultural connections to the area, knowledge of traditional cultural uses of the proposed project area, or are involved in any ongoing traditional and customary practices that may occur on or in the general vicinity of the project area. Please refer to Section 2.2 "Archaeological and Architectural Resources" and Appendix C for more information regarding the SHPD consultation; the other groups contacted did not respond to the consultation request.

Impacts and Mitigation Measures

Traditional Hawaiian land management practices and values are rooted in principles of resource stewardship, conservation, balance, and the interdependence of mauka-to-makai resources. The continued health of coastal waters and ecosystems is essential to the perpetuation of cultural practices and stewardship.

BMPs will be implemented during construction to prevent spills, erosion, or runoff that could affect nearby cultural resources or marine waters. The project will comply with applicable state and county regulations related to environmental protection and fuel storage.

Based on the limited scope of work and the enhanced environmental safeguards associated with replacing the UST with an AST, the proposed actions are not expected to result in significant adverse cultural impacts. On the contrary, by reducing potential risks to water quality, the project supports the continued health of the nearby coastal waters, thereby helping to

perpetuate traditional and customary cultural practices grounded in conservation and sustainable resource management.

2.4. Floral and Faunal Resources

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*
- 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*
- Newell's shearwater – *Puffinus newelli*

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:

- 'Akoko – *Euphorbia celastroides* var. *kaenana*
- 'Akoko – *Euphorbia skottsbergii* var. *skottsbergii*
- 'Ena'ena – *Pseudognaphalium sandwicense* var. *molokaiense*
- Carter's panicgrass – *Panicum fauriei* var. *carteri*
- Ihi – *Portulaca villosa*
- 'Ōhai – *Sesbania tomentosa*
- Popolo – *Solanum nelsonii*

Impacts and Mitigation Measures

The following guidance from the U.S. Fish and Wildlife Service (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.

The following mitigation measures were also provided by DAR as part of the early consultation for this EA:

- Artificial light can cause disorientation, leading to collisions or falls. Grounded fledglings may suffer injury or become more vulnerable to predators. All nighttime light sources, even during construction, should be shielded or angled downward to reduce the risk of harm to native seabirds.
- All nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15.

Train on-site workers to recognize State-listed waterbirds and seabirds. Halt all construction activities within a 100-foot radius (30 meters) should any State-listed waterbirds or seabirds be observed. Once the bird departs the area on its own, work can resume as usual.

Construction will occur entirely within the existing 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.

2.5. Environmental Quality

2.5.1. Visual Resources

The project site sits in a highly developed and industrial area of Kaka'ako. The sites' visual and physical environment are as follows:

- To the south is Kaka'ako Waterfront Park and the Pacific Ocean.
- To the north is Honolulu Harbor Pier Two.
- To the west is Honolulu Harbor Pier One and the Pacific Ocean.

- To the east is mixed-use residential and commercial development in the KCDD.

Impacts and Mitigation Measures

No significant impact on the area's visual resources is anticipated. The project site consists of two WWPS facilities, both visible from the street and at similar heights. Proposed actions to the site do not increase the footprint or height of the existing on-site structures and the new AST will be placed behind Ala Moana No.2 WWPS and will not impact any viewsheds.

The Primary Urban Center (PUC) Development Plan (DP) requires preservation of public views in high-intensity areas and maintenance of mauka-makai view corridors. The site is in a high-intensity region; however, it does not impede any mauka-makai view corridors or exceed height guidelines. Additionally, the site is not situated within a significant public view range of any major mountain or ocean as defined by the PUC DP.

2.5.2. Acoustic Characteristics

Multiple sources influence acoustic conditions in the vicinity of the Ala Moana No.1 WWPS. Ala Moana Boulevard, which is a major east-west corridor connecting downtown Honolulu and Kaka'ako with Waikīkī, is located within 500 feet of the pump station. Constant nearby traffic from Ala Moana Boulevard creates a steady background noise on-site. Passing ships, cruise ships, container handling, and other industrial activities in relation to the Honolulu Harbor contribute additional noise to the acoustic environment. In a letter dated January 2, 2026, the Hawai'i Department of Transportation (HDOT) indicated the potential for aircraft noise associated with the WWPS's proximity to Honolulu International Airport.

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 at night. 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.

2.5.3. Air Quality

The air quality at the WWPS is generally typical of coastal environments across Honolulu, where prevailing trade winds typically help disperse odors and maintain good air circulation. Emissions from nearby traffic on Ala Moana Boulevard and passing ships to and from the harbor may contribute to localized air pollutants. In an early consultation letter dated January 2, 2026, the HDOT indicated that occasional aircraft flights over or near the project location may contribute fumes, smoke, vibrations, and odors to the site due to its proximity to Honolulu International Airport.

Impacts and Mitigation Measures

No significant impacts to air quality are 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.

2.5.4. Hazardous Materials

The proposed AST will store up to 10,000 gallons of diesel fuel for WWPS 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 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.

The following controls (both administrative and structural) will be put in place to prevent and control any spill from the fuel tank and/or fuel piping lines:

- Underground piping shall be double-walled and constructed of fiberglass to contain underground piping spills and resist corrosion.
- Key features of the proposed leak detection and monitoring system include secondary pipe leak detection sensor, tank interstitial space leak sensor, tank tightness testing capability, and an automatic tank gauging system.
- Aboveground storage tanks shall be double-walled protected type in accordance with UL 2085.
- Underground storage tanks shall be double walled. The outer tank shall enclose the inner tank and provide leak containment.
- Fill connection to the tank shall be provided with overfill protection which shall automatically shut off fuel supply into the tank when the tank is 95% full.
- A Spill Prevention Control and Countermeasure Plan shall be completed.

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

Thirty-four new 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. 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.

2.6. Public Infrastructure & Services

2.6.1. Site Access, Circulation and Traffic

Vehicular access to the project site is from a driveway on Keawe Street, a side street off Ala Moana Boulevard. Access to the site is restricted to authorized City personnel and contractors for security and operational purposes. The parcel is fully enclosed within a chain-link fence and secured by a locked gate. On-site circulation consists of a small, paved area extending from the gate to the back of the property, running in between the Ala Moana No.1 and No.2 WWPS buildings, which is sufficient for maneuvering maintenance vehicles and equipment. Due to the nature of the facility, traffic generation is minimal and predominantly 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 Keawe Street and it is recommended that construction deliveries be scheduled to avoid peak hours. Temporary impacts to localized traffic on Ala Moana Boulevard may occur during construction of the proposed project, but the impacts are anticipated to be minimal.

2.6.2. Potable Water, Wastewater, & Stormwater

Water service is supplied by the Honolulu Board of Water Supply (BWS). It provides potable water for the facility, which is used for a sink and restroom, hose connections, seal water system, and irrigation (Fukunaga and Associates, Inc., 2012). Potable water is provided from an 8-inch water line on Keawe Street. In an early consultation letter dated January 6, 2026, BWS confirmed that the existing water system is currently adequate to accommodate the proposed development. However, the capacity of Honolulu's water system has been reduced due to the shutdown of the Hālawā Shaft pumping station, which was taken offline as a precautionary measure to prevent potential fuel contamination associated with releases from the Navy's Red Hill Bulk Storage Tank facility.

As stated earlier, wastewater from the Ala Moana WWPS No.1 is conveyed from both 60-inch and 78-inch force mains to the Sand Island WWTP.

Based on early consultation with DFM, they indicated that the City has storm water assets in the project vicinity.

Impacts and Mitigation Measures

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.

In an early consultation letter dated January 6, 2026, the BWS recommended the following measures to mitigate impacts on potable water resources:

- Implement voluntary water conservation strategies targeting a ten percent reduction in use.
- Prioritize drought tolerant plants on-site.
- Comply with BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.
- Utilize non-potable and greywater when possible.

In a comment letter dated February 17, 2026, the Department of Facility Maintenance, Storm Water Quality Division expressed concern that the impervious area of the site will increase from the proposed actions, negatively impacting the quality of storm water runoff from the site.

While an increase in the impervious area from construction is approximately 75 square feet, the additional runoff is anticipated to be minimal. It should be noted that the construction and proposed fuel storage area is generally flat and surrounded by curbs, limiting potential runoff. Due to the small size of the project area, if treatment of stormwater is required, low impact development BMPs will be used. Infiltration trenches near the perimeter of the gravel area will be used. Additional methods such as bioretention or rain gardens will be reviewed.

As indicated in DFM's letter, the project may be eligible for coverage under the Industrial General Permit as such, a Storm Water Pollution Prevention Plan would be required.

2.6.3. Power and Communications

HECO provides power to the pump station via underground facilities. Two circuits run from a handhole on Ilalo Street to a pad-mounted transformer that supplies power to the WWPS. The transformer is situated on the northwest side of the facility and 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 standby power system is used to provide backup power when normal HECO service fails. In case the Ala Moana No.1 WWPS system shuts down, standby power from Ala Moana No.2 WWPS can provide backup power.

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. The facility is remotely monitored by SCADA 24 hours a day. 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 UST for Ala Moana No.1 WWPS is currently offline due to failing fuel pipes and will be removed during construction. Fuel for the standby generator is supplied by the Ala Moana No.2 WWPS UST. Nevertheless, during the installation of the new AST, a temporary fuel source will be necessary to limit the total load on the Ala Moana No.2 WWPS UST. The scope of the temporary fuel system will be determined after existing conditions are confirmed and will follow BMPs to ensure backup power remains active.

2.6.4. Emergency Service Facilities

Law enforcement services are provided by the Honolulu Police Department (HPD). The nearest police station is the HPD Headquarters, located at 801 South Beretania Street, approximately 1.1 miles from the project site.

The Honolulu Fire Department (HFD) provides fire protection and first responder emergency services. The nearest fire station is the Kaka'ako Fire Station 09 and the HFD Headquarters, located at 555 Queen Street, approximately 0.6 miles from the project site.

The nearest health center is the Straub Benioff Medical Center, located at 888 South King Street, approximately 1.1 miles from the project site. The Queen's Medical Center, located at 1301 Punchbowl Street, is similarly close at approximately 1.2 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 Ala Moana WWPS. A letter from the HFD dated December 16, 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.

2.6.5. Recreational Resources

The area surrounding the Ala Moana No.1 WWPS is a highly developed, mixed-use industrial and recreational area that serves both residents and visitors. Located 0.1 miles south of the WWPS is Kaka'ako Waterfront Park, a 35-acre Beach Park with ocean access and picnic facilities. Approximately 0.2 miles north of the pump station is the Pier 2 Cruise Terminal, the primary cruise ship terminal serving O'ahu.

Impacts and Mitigation Measures

The proposed actions for the project are not anticipated to have any significant impact on the functionality or quality of existing recreational resources in the area.

2.7. Socio-Economic Characteristics

The project site is situated on the makai portion of Honolulu on the south shore of O'ahu, within the Ala Moana-Kaka'ako Neighborhood Area. This region is predominantly home to Asian (63.2%), White (14.9%), and Mixed ancestry (16.5%) populations (Department of Planning and Permitting, 2023). The Ala Moana-Kaka'ako area has a resident population of 26,338 people, 13,788 total households, and an average household size of 1.90 individuals. The median household income is \$68,716 (U.S. Census Bureau, 2020).

Impacts and Mitigation Measures

The project will generate short-term employment opportunities during the design and construction phases. It will not affect population levels or housing availability. The proposed upgrades will not alter the capacity or operational function of the WWPS. The community will continue to receive reliable wastewater services that support the economic stability and social welfare of the population served by the WWPS.

2.8. Cumulative Impact Assessment

The project site is in the KCDD and surrounded by mixed-use industrial, high-density residential, and commercial lots. Historically, one building permit has been approved for the project site, however, that permit was issued over seven years ago in April 2017. Therefore, in conjunction with the limited scope of the project, few direct impacts are anticipated with the proposed actions.

Secondary cumulative impacts, characterized by compounding impacts to the surrounding area by nearby projects, are generally associated with the ongoing rapid development of the KCDD and the Honolulu Rapid Transit Authority Skyline Rail project. However, the increased population and urbanization of the KCDD have been planned for by the HCDA since the 1970s.

According to the Final Environmental Assessment for the Kaka'ako Block C Development, published in March 2023, multiple new high-rise structures are planned for the areas mauka of Ala Moana Boulevard, along Coral and Auahi Streets. The Block C development is part of a larger plan to develop the Kamehameha School lots in KCDD Mauka, continuing to establish Kaka'ako as a high-density district in Honolulu. These plans include multiple completed skyscrapers and commercial centers, like The Collection and SALT, as well as proposed expansion sites that currently do not have finalized plans.

For purposes of understanding nearby cumulative impacts, outside of large development projects in Kaka'ako, building permit applications were reviewed for all properties within the 500-foot radius of the site. Eight properties were identified as having applied for building permits in the last five years (see Figure 14). Of these, six sites have received building permits and have ongoing or foreseeable construction. Details about the most significant permits are as follows:

1. TMK 2-1-060:009 – Two permits have been approved for the site in the last five years. Proposed actions consist of internal alterations to the existing facilities, including air conditioning, internal plumbing, fire suppression systems, and all associated electrical work.
2. TMK 2-1-059-013 - Ten permits have been approved for the site in the last five years. All ten permits were issued for internal alterations to existing office spaces and internal demolition work, including plumbing improvements, air conditioning maintenance, antenna repair/installation, fire system repair, and all associated electrical work.
3. TMK 2-1-015:063 – One permit was issued in the last five years. Proposed actions include replacing the electrical meter on the existing pole with a new meter.
4. TMK 2-1-055:050 –Six permits have been approved for the site in the last five years. All six permits were issued for internal building alterations or limited

electrical work, including electrical hook ups for business signs, plumbing improvements, internal store renovations, fire system repair, air conditioning maintenance, and associated electrical work.

5. TMK 2-1-055:044 – One permit was issued in the last five years. Proposed actions include alterations to the existing restaurant, including plumbing improvements, air conditioning maintenance, fire system repair, and all associated electrical work.
6. TMK 2-1-055:041 – One permit was issued in the last five years, with one proposed action, installing an electrical hook up for a new wall sign.

Nearby building permits applied for in the last five years and currently under review are as follows:

1. TMK 2-1-060:009 - Application Number A2024-01-0092. Proposed actions include alterations to the existing research center, including plumbing work, air conditioning maintenance, fire system repair, and all associated electrical work.
2. TMK 2-1-059:013 – Application Number A2023-02-0384, Application Number A2024-05-0294, Application Number A2024-09-1182, and Application Number A2025-07-0373. Proposed actions include internal alterations to tenant spaces, which involve plumbing work, air conditioning maintenance, electrical work, fire system maintenance, and exterior facade repair.
3. TMK 2-1-059:011 – Application Number A2025-02-0924. Proposed actions include internal alterations and electrical work to the existing car dealership.
4. TMK 2-1-055:048 – Application Number A2024-10-0745. Proposed actions include internal alterations to the restaurant plumbing and fire system.

Furthermore, according to the most recent DPP SMA Minor Permit and Public Input maps, there are no projects with an approved SMA within a 500-foot radius of the parcel.

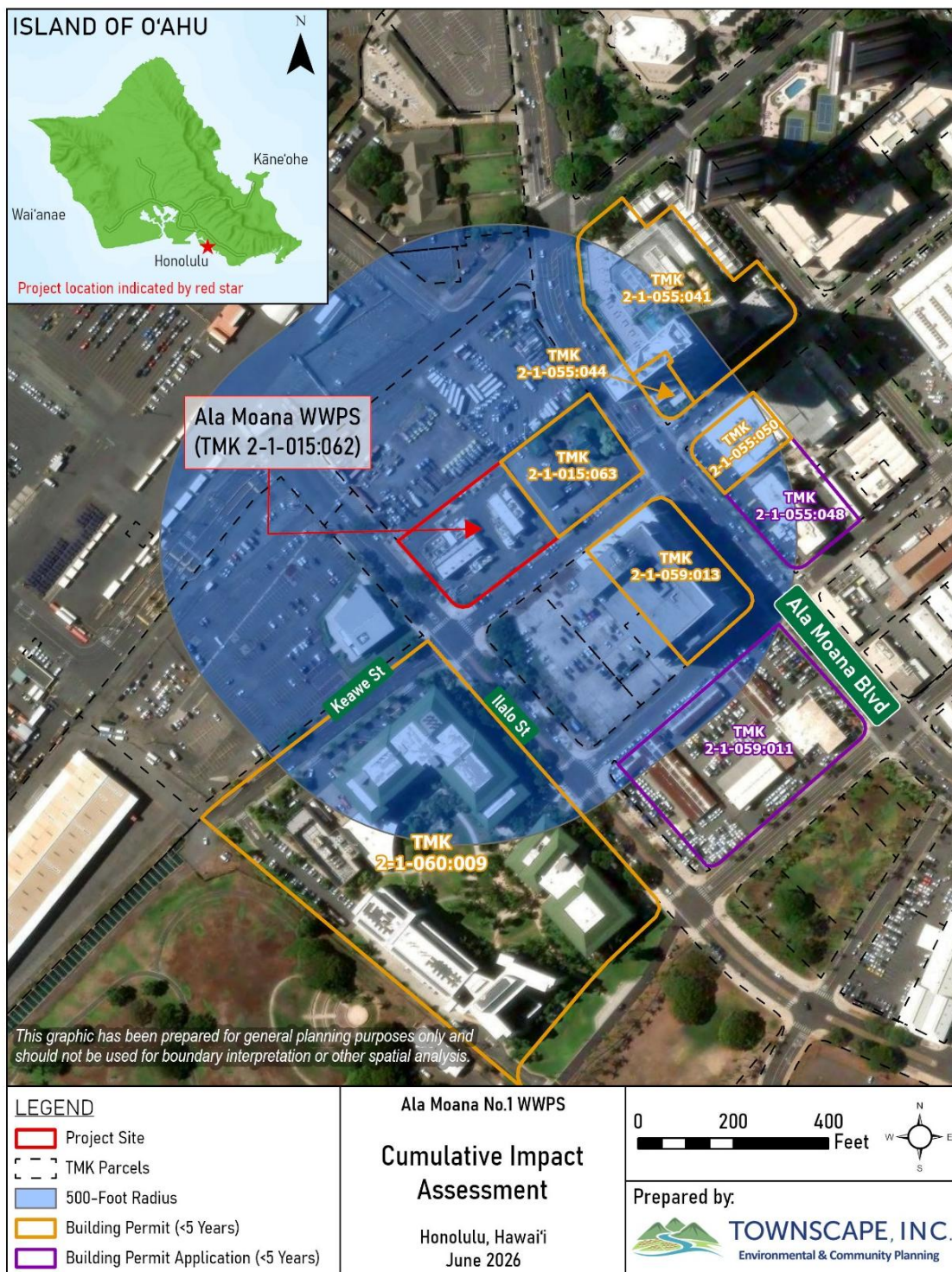
Impacts and Mitigation Measures

The Block C Project and other residential/commercial developments proposed on Kamehameha School lots in KCDD Mauka, will continue to transform the area into a major population center of Honolulu, increasing traffic, population, urbanization, parking lots, and pedestrian movement.

Outside of the Block C Project, the projects within a 500-foot radius of the WWPS are limited to internal site maintenance, alterations of existing structures, and utility repairs. Since the projects are nearby, if timelines overlap, simultaneous construction can increase traffic congestion, street closures, ambient noise, air pollution, fugitive dust,

and erosion. However, based on their limited scopes of work, the lots within the 500-foot radius of the project site are not anticipated to significantly impact population levels, traffic, erosion, or air pollution in the foreseeable future. Additionally, it is assumed that all these ongoing and future projects will adhere to the development standards consistent with their associated HCDA designation. Therefore, when considered in combination with past, present, and reasonably foreseeable development, the proposed Ala Moana No.1 WWPS improvements are not anticipated to result in significant contributions to cumulative impacts on SMA resources. Rather, the project is intended to help protect SMA resources by reducing potential fuel leaks into the environment.

Figure 14 Cumulative Impact Assessment



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 typically regulated by County zoning (see Section 3.8 City and County of Honolulu LUO). However, the facility is situated within the KCDD, therefore, it falls under the purview of the HCDA (see Section 3.3 for more information). 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. Kaka'ako Community Development District Makai Area

In 1976, the KCDD was instituted under the administrative control of the HCDA and codified by HRS Chapter 206E. The HCDA aims to revitalize underdeveloped urban communities in Hawai'i. HCDA's policy and planning goals supersede those of the City and County of Honolulu, requiring all development to comply with their development goals and land use designations. Kaka'ako was deemed a significant development area due to its prominent location between downtown Honolulu, Makiki, and Waikīkī. Since then, the KCDD has seen substantial investment in creating a mixed-use urban area with residential, commercial, and industrial development. For planning and zoning purposes, the KCDD is divided into two sections, the KCDD Mauka and the KCDD Makai.

KCDD Makai was designated as a separate entity from the Mauka area in 1982. HCDA created the new designated sections to prioritize different development goals. KCDD Mauka was to remain focused on creating a mixed-use high-density residential and commercial area, while KCDD Makai was established to preserve industrial, recreational, and commercial lands.

As stipulated in HAR §15-23-30, KCDD Makai is separated into three different subdistricts. The Ala Moana WWPS is situated within the Makai Urban Zone (MUZ) subdistrict. According to HAR §15-23-31, the purpose and intent of the MUZ as a subdistrict is to promote and protect public health, safety, and general welfare. The general goals of the MUZ include the following:

- (1) To provide a subdistrict whereby a variety of urban uses may coexist compatibly within the same area. The emphasis within this zone shall be to develop a mixed-use multistoried area which will provide jobs and other employment opportunities. In addition, the area will support a variety of appropriate community facilities;
- (2) To create a truly vibrant environment by regulating the density and bulk of buildings in relation to the land around them and to one another, by requiring the provision of open space and encouraging the development of job opportunities;
- (3) To provide freedom of architectural design, in order to encourage the development of more attractive and economic building forms; and
- (4) To promote the most desirable use of land and direction of building development in accord with a well-considered plan, to promote community stability, to protect the character of the district and its peculiar suitability for particular uses and to conserve the value of land and buildings.

HAR §15-23-42 states the minimum lot area, width, and depth; however, it does not apply to pumping stations.

The guiding document for KCDD Makai is the Makai Area Plan, adopted by the HCDA in 2023, and was implemented to formally reflect the Legislature's ban on residential uses in the area and to incorporate all relevant development goals. Infrastructure and public facility improvements are key considerations throughout the document, encompassing utilities and parks. The Makai Area Plan emphasizes that utility improvements, including wastewater, need to occur before commercial development can proceed. The plan also supports revitalizing KCDD Makai through expanded green spaces and public shoreline access areas.

Discussion:

The Ala Moana No.1 WWPS is located in KCDD Makai, subdistrict MUZ, which is administered by the HCDA and subject to its development standards. WWPS operations and project designs are consistent with the development standards of the KCDD Makai Area Rules and will require an Rules Clearance as outlined in HAR §15-23-27. Operating on State owned land, the WWPS facility and encompassing land is leased to the City to manage and maintain the premises.

Adhering to the infrastructure project implementation strategies outlined in the Makai Area Plan, the proposed actions are undertaken to improve WWPS operations. By replacing the non-operational UST with an AST, the project ensures reliable wastewater service for the KCDD during power outages. Furthermore, the AST will include increased fuel monitoring and secondary fuel containment, thereby protecting the soil and coastline from potentially hazardous diesel fuel leaks, safeguarding the environmental conditions required for the continued expansion of green spaces and shoreline access. Overall, the proposed actions will serve to protect the community from environmental hazards and improve wastewater management, supporting the growth of KCDD Makai.

3.4. 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:

While the project site is near coastal recreation areas, access to shoreline recreational areas will not be impacted.

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 UST with an AST located behind the existing building, furthest from the street. The AST will be placed on the existing footprint of the UST, minimizing any encroachment into open spaces.

The proposed location of the AST is determined by the presence of the existing WWPS infrastructure and its critical role in ensuring the continued operation of the WWPS during power outages. The entire facility is within a highly developed mixed-use industrial area, with limited open spaces, and no impacts to the surrounding visual environment are anticipated.

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 potential spills and minimize environmental contamination.

In addition, the project enhances accessibility and monitoring capabilities, supporting 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.

BMPs will be implemented during the construction phase to prevent runoff of contaminants into the nearby coastal environment.

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 commercial, industrial, and residential lots from multiple high-density neighborhoods in Honolulu to the Sand Island 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 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. Additional opportunities for input will be made available during the SMA Use Approval process, which will include a public hearing.

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 makai 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.

3.5. 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 Use Approval. On O‘ahu, the SMA permit is administered by the City Department of Planning and Permitting, but pursuant to HRS 206E-8.5, all requests for development within a SMA on any lands within a community development district, for which a community development plan has been developed and approved, shall be submitted to and reviewed by the lead agency as defined in Chapter 205A. Thus, the proposed project will require a SMA Use Approval from the Office of Planning and Sustainable Development.

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 Ala Moana No.1 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 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 PUC DP encompasses the area from Wai‘alae-Kāhala to Pearl City, in which the Ala Moana No.1 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 accommodate population growth while bolstering environmental resilience and maintaining a quality of life for residents. The project supports the following goals and policies:

Goal WR-2: Protect ground and surface water quality from polluting land uses.

Policy WR-2.1: Protect drinking water aquifers, and surface and nearshore waters from contamination by developed land uses, urban runoff, underground fuel storage, and illegal dumping.

Goal WR-3: Maintain resilient water infrastructure systems.

Policy WR-3.3: Improve coordination of wastewater infrastructure and land use planning.

Discussion:

The Ala Moana No.1 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 AST allows for easier access to the fuel tanks for necessary maintenance and repairs and avoids the risk of leakage into the soil and nearby coastal ecosystems.

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 KCDD (Figure 3). The KCDD is under the jurisdiction of the state entity HCDA, whose plans and policies supersede those of the LUO (see Section 3.3 for more details).

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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 backup 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.

4.3. Replace Existing UST with a compliant UST

This alternative would replace the existing UST with a new, compliant UST to meet regulatory requirements. However, it is not a preferred alternative because USTs are more difficult to inspect, maintain, and monitor for leaks or structural damage compared to ASTs. USTs are also more vulnerable to groundwater infiltration, particularly as groundwater levels rise. While a UST would have no visual presence and would be less susceptible to damage from vehicles, it would pose a greater risk of soil contamination and potential impacts to water quality. Thirty-four concrete-filled steel pipe bollards will be installed to protect the new AST from vehicular traffic and accidental contact.

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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
- Improvement and Development Permit

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
- Special Management Area 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 has determined that a Finding of No Significant Impact (FONSI) is appropriate. 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.

(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 power outage's 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 facilities.

(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. See Section 2.8 “Cumulative Impact Assessment” for more details.

- (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 effects 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 within a high-risk flood zone (Zone AE). A minimum of three feet of freeboard above the FEMA Base Flood Elevation is required for structures within special flood hazard areas. Since the Base Flood Elevation is 5 feet, the required pad elevation is 8 feet. The existing grade at the lowest corner within the tank footprint is 6 feet; therefore, the pad height will be constructed approximately two feet above the existing grade.

- (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 situated on already developed land, and the AST will not increase the footprint of the facility.

(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

7.1. Early Consultation Period

An Early Consultation Letter and Handout was sent on December 4, 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 Aquatic Resources ✓
 - 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

Ala Moana-Kaka‘ako Neighborhood Board
Hawaiian Electric Company ✓

7.2. Draft EA Comment Period

The Ala Moana No.1 WWPS Draft EA was published on May 8, 2026 in the State Office of Planning and Sustainable Development’s semi-monthly publication, The Environmental Notice. A 30-day comment period from May 8, 2026 to June 8, 2026 provided an opportunity for public review and submission of written comments on the Draft EA. A letter notice announcing the publication was sent to the agencies, organizations, and interest groups listed in Section 7.1.

A total of eleven comments were received during the public comment period. Seven comments were not considered substantive and therefore, did not require responses. Substantive comments, for which responses were provided, are indicated with an asterisk (*) below. Copies of all comments and responses are included in Appendix D.

State of Hawai‘i

Department of Land and Natural Resources
Engineering Division
Land Division

Department of Health

Department of Transportation*

Office of Planning and Sustainable Development*

Office of Hawaiian Affairs*

City and County of Honolulu

Department of Design and Construction

Department of Planning and Permitting*

Honolulu Police Department

Department of Facility Maintenance

Other

Hawaiian Electric Company

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Appendix A

Archaeological Literature Review and Field Inspection Report

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Draft

**Archaeological Literature Review and Field Inspection
for the Ala Moana No. 1 Wastewater Pump Station
Improvements Project, 210 Keawe Street, Kaka‘ako Makai,
Honolulu Ahupua‘a, Honolulu (Kona) District, O‘ahu
TMK: (1) 2-1-015:062**

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

**Prepared by
David W. Shideler, M.A.,
and
Hallett H. Hammatt Ph.D.**

**Cultural Surveys Hawai‘i, Inc.
Kailua, Hawai‘i
(Job Code: KAKAAKO 324)**

January 2026

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Management Summary

Reference	Archaeological Literature Review and Field Inspection for the Ala Moana No. 1 Wastewater Pump Station Improvements Project, 210 Keawe Street, Kaka'ako Makai, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu, TMK: (1) 2-1-015:062 (Shideler and Hammatt 2026)
Date	January 2026
Project Number(s)	Cultural Surveys Hawai'i, Inc. (CSH) Job Code: KAKAAKO 324
Investigation Permit Number	Archaeological fieldwork was conducted 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 (CSH presently operates under permit number 26-32).
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	The project area is at 210 Keawe Street, central Honolulu, Kaka'ako Makai area, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu (TMK: [1] 2-1-015:062). The project area is 80 m <i>makai</i> (toward the sea), southwest of Ala Moana Boulevard on the northwest side of Keawe Street. The project area is depicted on a portion of a 2017 Honolulu U.S. Geological Survey (USGS) 7.5-minute series topographic quadrangle (Figure 1), a tax map plat (Figure 2), and a 2023 aerial photograph (Figure 3).
Land Jurisdiction	C&C
Project Acreage	The project area is approximately 1.215 acres (0.49 hectares).
Project Description and Ground Disturbance	The City Department of Environmental Services proposes the following site improvements: • Replace an underground storage tank (UST) with aboveground storage tank (AST) • Replace fuel piping • Replace fuel monitoring panel and all sensors A provided Demolition and Control Plan (Figure 4) and a Site Plan (Figure 5) show that the work will be largely restricted to the central northwest side of the Ala Moana No. 1 WWPS facility (but the entire facility is addressed in this study). The primary ground disturbance would be associated with removal of the existing 10,000 gallon diesel underground storage tank (UST) but, 1) this area has already been excavated for the placement of the tank, and 2) the area is understood as fill.

Historic Preservation Regulatory Context	This is a state/municipal (C&C ENV) “governmental” project needing review under Hawai‘i Revised Statutes (HRS) §6E-8 and HAR §13-275.
Document Purpose	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.
Natural and Built Environment	The Ala Moana No. 1 WPS Improvements project area is on reclaimed land that was formerly shallow marine flats. As a geological map (Figure 6) indicates, the bedrock of the project area is “coral ledge” or raised reef limestone deposited in a former high stand of the sea. 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) soils within the project area (Figure 7) are indicated as “Fill land, mixed” (FL): It consists of areas filled with material dredged from the ocean or hauled from nearby areas, garbage, and general material from other sources. Included in mapping were a few areas that have been excavated. This land type is used for urban development including airports, housing areas, and industrial facilities. [Foote et al. 1972:31] As late as 1887 (Figure 14) the project area is understood to have been in shallow off-shore waters but may have been infilled by 1891 (Figure 15). Much of the fill activity at the time appears to have been through the disposal of municipal garbage through open burning of trash (Figure 22). Annual rainfall in the project area is estimated at 636.5 mm (25.1 inches) which is regarded as insufficient for non-irrigated agriculture (Giambelluca et al. 2013). The project area is within the large area popularly known as “Kaka‘ako Makai” located between downtown Honolulu to the north and Waikīkī to the southeast and approximately 80 m south of Ala Moana Boulevard, a major vehicular thoroughfare in coastal Honolulu. Major enterprises in Kaka‘ako Makai include the John A. Burns School of Medicine (JABSOM) located just 50 m to the south, the University of Hawai‘i Cancer Center, the Children’s Discovery Center and Kaka‘ako Waterfront Park. The Honolulu Harbor entrance and Pier 1 are located approximately 400 m to the northwest. Kewalo Basin Harbor, a major harbor for vessels engaged in commercial fishing, sports fishing, and tours, is located approximately

	650 m to the southeast (in a former “HIC” stream channel cut through the reef; Figure 6).
Background Research Methods	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).
Cultural Context	The project area was offshore shallows during traditional Hawaiian times and would have been extensively used for the gathering of literal resources by the substantial Hawaiian communities to the northwest (Honolulu or Kou) and southeast (Waikīkī) but would not be expected to have any trace of traditional Hawaiian archaeological resources. The adjacent formerly coastal land to the northeast was extensively used for fishponds and salt pans but was generally not a place of habitation—a pattern that would continue until nearly the end of the nineteenth century (Figure 8 through Figure 14).
Land Commission Awards (LCAs)	The project area was well off shore on an extensive area of shallow reef flats in traditional Hawaiian times but the adjacent coastal area included resources in the numerous fishponds and salt ponds that were claimed as Land Commission Awards (LCAs) following the Kuleana Act of 1850 (best depicted in a much later 1884 Bishop map [Figure 13], colorized and annotated to provide detail). To some extent this pattern reflects the increasing mercantilism of growing Honolulu by 1850 with both domestic and commercial demand for fish and salt. House lots are indicated as set well back from the coast (the nearest approximately 500 m inland from the project area). The nearest LCA was LCA 7713:6. The <i>‘ili</i> (land division smaller than an <i>ahupua‘a</i>) of Ka‘ākaukui (LCA 7713) was awarded to Victoria Kamāmalu, sister of Kamehameha IV and Kamehameha V. There were no awards to commoners in this <i>‘ili</i>, which seems to have consisted entirely of land used for salt making. No residences are shown in this area until the twentieth century. The largest settlement in the vicinity was the village of Honuakaha, at the corner of Punchbowl and King streets. A large number of house lots were awarded to commoners in this area (500 m to the northeast of the project area; Figure 13), and late nineteenth century and early twentieth century maps always show a cluster of houses in this area.

Historical Background Focused on a Review of Historic Maps and Aerial Photographs	The 1817 Kotzebue map (Figure 8) shows the relatively high density of thatched houses in Honolulu to the north and Waikīkī to the southeast with a lower density of habitations in the vicinity of the present project area, which is, however, indicated as a locus of both fishponds and salt pans. This map depicts the wide, shallow fringing reef on the southeast side of the Honolulu Harbor entrance on which the project area is located. The 1825 Malden map of the Honolulu Harbor entrance (Figure 9) provides a detail of the fishponds close along the coast near the project area which was out on the “Dry at Low Water” coastal flats. Again habitation is focused to the north near the entrance to the harbor. The 1855 LaPasse map (Figure 10) still shows Honolulu as a modest town bounded on the southeast by what would become Punchbowl Street by the “<i>Temple Protestant</i>” (Kawaiaha’o Church). Several “<i>Pecheries</i>” (fishponds) are noted along the adjacent coast, but the project area is out on the fringing reef. Relatively few houses are depicted on the adjacent coast. The 1876 Lyons map (Figure 11) shows the very extensive development of salt pans back from the coast in the vicinity (the project area is still out on the “reef”). There is no developed coastal road. The 1881 Covington map (Figure 12) shows Honolulu developing to the northeast of the project area but this development is well inland (along King and Beretania streets) owing in large part to the marshy, low-lying nature of the coastal lands. An unimproved road (approximating a portion of today’s Ala Moana Boulevard) does extend south along the coast from Honolulu to near the project area. The “Kakaako Salt Works” dominate the adjacent coast. The project area is out on the reef flat. The 1884 Bishop map (Figure 13, colorized and annotated to provide detail) shows the distribution of neighboring LCAs, ca. 1850, which are dominated by fishponds and salt ponds. Major landmarks in the immediate vicinity include the Immigration Depot (250 m to the north), the “Pu’unui Kakaako Salt Works” (250 m to the northeast), and the Leper Hospital (100 m to the east). An unimproved road (approximating a portion of today’s Ala Moana Boulevard) does extend south along the coast from Honolulu to near the project area and a “Beach Road” (today’s Ala Moana Boulevard alignment) extends along the coast from the southeast to the Leper Hospital. Notably the house lots are well inland. The project area is offshore. The 1887 Wall map (Figure 14) conveys the continuing general lack of development in the project vicinity. A coastal road (labeled “Kaka’ako”) extends southeast from Punchbowl Street to the Immigration Depot, passing the Kingdom’s flag staff and largely ceremonial artillery battery, and on to a fenced rectangle corresponding to the “Leper Hospital.” No other roads or homes are indicated in the project area vicinity (the project area is still offshore).
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	The 1891 Dodge map (Figure 15) provides details of the project area suspiciously similar to the 1911 Podmore map (Figure 18) of 20 years later. The Dodge map depicts a distinctive “pumping station” to the northeast of the project area which is in fact the extant Kakaako Pumping Station—but work on this didn’t begin until 1899 and it wasn’t completed until 1900 (Cummins 1973). Thus, we conclude the 1891 Dodge map includes additions of at least eight years later. Ala Moana (Boulevard) is indicated as a major coastal road to the southeast (Diamond Head side) and is sketched in with dashed lines to the north indicating it was planned but not yet built. To the northwest of the project area is an area of “Coral Reef” shallows embayed by a U-shaped seawall that was being used as a “Dumping Ground” as part of coastal land reclamation. On the southeast side of the project area is a dashed-in <i>makai</i> extension of Keawe Street but how complete this stretch of road is at this time (or whether it is even dry land) is unclear. In the northwest portion of the project area the Dodge map indicates a J-shaped road leading out to a “Crematory” (addressed further below) that is accessed on an approach labeled “trestles for wagons” suggesting at least part of this access was a pier extending over awash coral flats. A rectangular building approximately 25 m southwest of the project area is labeled “powder magazines” but again it is unclear if this was extant at the date of the map (1891) or was a much later addition to the map. The 1897 Monsarrat map (Figure 16) shows the slow expansion of development into the coastal lands of Kaka‘ako and Ka‘ākaukui. The “Beach Road” (today’s Ala Moana Boulevard) comes in from the east smack on the coast but is still unimproved close to the project area. A large, roughly U-shaped “sea wall” has been built out onto the “Coral Reef” to the northwest of the project area as a part of coastline reclamation. The project vicinity is still remarkably undeveloped and this map indicates that in 1897 the project area was still offshore shallows (suggesting the infrastructure near the project area depicted on the 1891 Dodge map [Figure 15] was in fact a much later addition to the map). The 1909 Monsarrat map (Figure 17) is primarily concerned with documenting “Fisheries” but provides details of some developments seaward of the immediately coastal “Moana Road.” The U-shaped seawall is clearly labeled as “Dump” and it appears likely that infilling, largely with municipal waste, is far along within that enclosure by this time. The extant Kakaako Pumping Station, completed in 1900, is prominent and has the appearance of a small rectangular peninsula extending offshore. A long (1,500 m long) “Sewer Pipe” extends from the Pumping Station offshore crossing the immediate vicinity of the present project area. The 1911 Podmore map (Figure 18) shows improved Ala Moana and Keawe Street as in place. The U-shaped seawall (labeled “Sea Wall”) west of the project area is labeled “U.S. Naval Reservation” with an annotation “Proposed Sea Wall” connecting with the outer edge of the established
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	seawall and extending southeast with an annotation of “365,000 cu. Yards to fill to grade.” It appears the offshore area immediately southeast of the project area was actively being filled (with about 1 ½ feet [ft] of an anticipated 4 ft of fill in place). The lay of the land in the project area per se is not altogether clear. It does appear a trestle to support wagons extended out to a “crematory” The project area lies within a long rectangle extending off shore labeled “Territory of Hawaii Reservation” which is understood as basically a sewer line easement. The “Powder Magazine” is again depicted about 25 m to the southwest of the project area. Like the powder magazine, the citing of a “crematory” within the project area on the 1911 Podmore map (and with less certainty on the 1891 Dodge map; see also the 1922 Newton map, Figure 23) suggests the location was chosen to be out-of-the-way of polite society. The 1891 Dodge map, 1911 Podmore map, and 1922 Newton map appear to show much the same scene of the crematory in the project area with a trestle access for wagons and a short pier extending southwest of the crematorium. There is some uncertainty regarding the history of the “Crematory” in the project area. It does appear most likely this was exclusively for the burning of municipal garbage (as was a somewhat similar incinerator to the east at the west side of Kewalo Basin harbor). In the 1899-1912 timeframe, popular newspaper articles use the word “crematory” indiscriminately to refer to both crematoria for human bodies and incinerators for municipal garbage. Articles in the timeframe refer to crematoria for the cremation of human bodies at Quarantine Island (part of present-day Sand Island) and in Nu‘uanu, and refer to crematoria for incinerating garbage at Kaka‘ako (and a crematory for pineapple refuse seemingly at Hawaii Preserving Company lands, location uncertain). Rarely is any detailed geographic location of the crematory under discussion supplied. In 1899 the Board of Health debated establishing a “Crematory for the refuse of the City [...] a refuse or garbage crematory” (<i>Pacific Commercial Advertiser</i> 14 December 1899). It should be emphasized that what is discussed as a “Crematory” was an incinerator for municipal refuse (there was much discourse in the same timeframe for a crematorium for human bodies, particularly bubonic plague victims, also referred to as a “crematory”). In January 1901, “Advertisement for tenders for the construction of the foundation of the garbage crematory have been published” (<i>Pacific Commercial Advertiser</i> 12 January 1901). The location of the proposed new crematory was “on the low plain between the kerosine oil warehouse and the rifle range in Kakaako, a few hundred yards makai of the rubbish dumping ground” (<i>Pacific Commercial Advertiser</i> 12 January 1901). The rationale is explained as follows:
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	The practice of picking over the pile of refuse matter by children and even adults was dangerous on account of the liability of contracting contagious diseases. Soon after the [bubonic] plague outbreak a year ago the Board of Health demanded that a suitable crematory [for municipal garbage] be constructed. [<i>Pacific Commercial Advertiser</i> 12 January 1901] At the end of 1904, we read, The guests [at an informal lunch of medical friends hosted by Dr. Charles B. Cooper] were then taken across the harbor and conveyed to the sewer pumping station, which was inspected, and to the unfinished garbage crematory. This is in course of construction and the three hoppers were in place. The place where the smokestack was being erected, is being remodeled, the original foundations having caved into the waters of the ocean. This accident has necessitated the additional expense of about \$2,000. The crematory will be able to burn all the garbage of Honolulu. [...] A crude and very small crematory is in use on the grounds in which the refuse from the fish markets is burned. [<i>Pacific Commercial Advertiser</i> 21 November 1904] At the beginning of 1905 a recommendation was made in a Board of Health report that “A crematory [contextually clearly for human bodies] should be provided adjacent to the garbage crematory” (<i>The Hawaiian Star</i> 24 February 1905). It appears the concept was for a crematorium for human remains adjacent to the garbage crematory in the present project area but whether this recommendation went anywhere is uncertain. To address this need for a (garbage) “crematory,” the Territory of Hawaii “imported” a “mechanism” “that cost \$15,000” (<i>Pacific Commercial Advertiser</i> 1 March 1906). For a long time after the mechanism was imported it lay in the waterfront muck rusting because there was no appropriation for installing it in a suitable building. Ultimately not long ago, a structure was provided and the plant installed. Then it turned out that there was no money to operate the crematory. So it began taking on a new crop of rust. [<i>Pacific Commercial Advertiser</i> 1 March 1906] At issue was that the responsibility for garbage disposal had passed from the Territory of Hawaii to the counties. The County of Oahu had determined that it would “[...] cost \$800 a month to operate the crematory, while the expense of using the dumps [“dumping grounds at Iwilei and on the Ala Moana road” are specified] was but \$120 a month. (<i>Pacific Commercial</i>
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	<i>Advertiser</i> 1 March 1906). Thus, the crematory mechanism and structure were a “white elephant” as referenced in the title of the 1906 article. The upshot of the discussion at the Board of Health Meeting of 1906 was seeming agreement that the County of Honolulu was “violating the law now” and a resolution for the Territory Board of Health to send a letter to the county Board of Supervisors asserting, That no public dumping ground for the dumping and depositing off garbage at Honolulu Oahu, be allowed and that the Board of Supervisors be recommended to use the garbage crematory. [<i>Pacific Commercial Advertiser</i> 1 March 1906] It is not altogether clear, but it appears likely the crematory in the present project area was soon (in 1906 or shortly thereafter) put into use, but (for whatever reason) in May 1911 “The garbage crematory, not being used at the present time, will be brought into service” (<i>Evening Bulletin</i> 19 May 1911). A significant increase in garbage collection, from six garbage wagons to ten garbage wagons, was envisioned at that time (<i>Evening Bulletin</i> 19 May 1911). A passing reference to the locations of new buoys in Honolulu Harbor notes angles to a “crematory chimney” (<i>Honolulu Star-Bulletin</i> 19 August 1915) which likely references the crematory in the present project area, the crematory chimney being a prominent coastal landmark. This 1915 reference to the crematory chimney and the 1922 Newton map are the last identified references to the crematory in the project area. Whether any remnant of the indicated crematory is present in the project area—such as foundations of the indicated building and pier and trestles for wagons, remnants of the “mechanism,” remnants of the “three hoppers,” or remnants of the two smokestacks—or buried under fill of the project area is uncertain. The 1911-1920 postcard of Fort Armstrong (Figure 19) shows the new military reservation developed on recently reclaimed land on the southeast side of the Honolulu Harbor entrance. This image of the “fort” suggests it is built on compacted fill with primarily temporary structures (tents) at that time. Fort Armstrong was built in 1907 and operated under the U.S. Army until 1950. The 1919 U.S. Army War Department fire control map (Figure 20) indicates the Fort Armstrong lands had been completely reclaimed (with reclamation extending well southeast of the former U-shaped seawall) and had many permanent buildings (and a section of railroad track). The “Fort Armstrong” label extends over the present project area and is seemingly bounded on the southeast side by Keawe Street. Keawe Street has been extended <i>makai</i> on this newly reclaimed land to approximate its present extent. The seawall has indeed been extended significantly to the southeast but to what extent it has
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	been infilled southeast of Keawe Street is unclear (no roads or structures are indicated <i>makai</i> of Ala Moana Boulevard southeast of Keawe Street). The 1920 Monsarrat map (Figure 21) shows a layout of unimproved (or planned) streets in the newly reclaimed Kaka‘ako Makai lands southeast of the project area suggesting that most, or all, of this reclamation had been completed. The project area lies within a rectangle labeled “Sewer Pump” but the “Sewer Outlet” is skewed to the southeast to the edge of the reef. This map suggests Fort Armstrong did not extend as far southeast as the “Sewer Pump” designated area that includes the project area. Kewalo Basin appears to be in the process of being created as a harbor with an indicated “Proposed Channel.” A 1921 photograph of a city worker supervising open burning of trash (Figure 22) depicts what is understood as the somewhat ad hoc nature of much of the infilling activity at Kaka‘ako Makai. The 1922 Newton map (Figure 23) provides our clearest depiction of the relationship of the “Crematory” and “Trestle for Wagons” and possible short pier to the southwest within the northeast side of the project area. Although unlabeled, this 1922 map still depicts the powder magazine just to the southwest outside the project area. The 1922 Newton map seemingly is clear that the project area was subject to Presidential Executive Order No. 2901 dated 2 July 1918 pertaining to “U.S. Military Reservation.” This is understood as a Woodrow Wilson executive “Order of Withdrawal of Certain Public Lands for Military Purposes; Oahu, Territory of Hawaii” indicating most of the project area (the southwestern 2/3) was in fact part of a U.S. military reservation (Fort Armstrong) from that date. The 1928 USGS map (Figure 24) shows a large U-shaped building extending into the southwestern project area as well as a smaller building to the northeast understood as part of Fort Armstrong. This same building configuration is depicted in the 1933 (Figure 25) and 1943 (Figure 27) U.S. Army War Department fire control maps. A 1939-1941 U.S. Army Air Corps aerial photograph (Figure 26) provides a good depiction of this former U-shaped building (and another U-shaped building outside the project area just to the southwest) but the depiction of the northeast portion of the project area appears at variance with the bracketing 1933 and 1943 maps. A 1952 Kakaako aerial photograph (Figure 28) shows much the same scene in the project area as the 1939-1941 aerial photograph with a portion of a distinctive U-shaped building extending into the southwest project area and a rectangular building in the northeast/central portion of the project area (both understood as associated with Fort Armstrong). The 1953 USGS map (Figure 29) shows the project area within a large reddish tint denoting urban development. Notably the “Fort Armstrong”
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	label is positioned northwest of the project area suggesting the effective dismantling of the “Fort” was proceeding following its abandonment in 1950. This is consistent with the construction of the Ala Moana # 1 building by the county in 1954. The 1954 Kakaako aerial photograph (Figure 30) appears to show the brand new Ala Moana # 1 building in the northeast side of the project area but continues to show a portion of a U-shaped building and a parallel rectangular building in the southwest project area understood as remnant structures of Fort Armstrong. The annotated 1957 Hashimoto map (Figure 31) shows the same configuration with a portion of a U-shaped building and a parallel rectangular building in the southwest project area understood as remnant structures of Fort Armstrong. The 1969 USGS map (Figure 32) lacks detail but notably shows the northwest end of Ilalo Street (<i>Ilalo</i>, lit. “below”; Pukui et al. 1974:55, understood as its being “below” Ala Moana Boulevard) ending at the south corner of the project area. “Fort Armstrong” still exists as a place name (the annotation extending into the present project area) but it appears the western (white) portion is now part of the State Honolulu Harbor while the eastern portion is now part of municipal Honolulu. A 1978 USGS orthophotoquad aerial photograph (Figure 33) shows the Ala Moana # 1 building in the northeast side of the project area but the central and southwest portions of the project area appear vacant (the former Fort Armstrong army buildings are gone). A 1982 aerial photograph (Figure 34) appears to show the present Ala Moana #2 building (which bears a date of 1983 but appears to have been largely completed by the time of this aerial photo). Even as late as the 1998 USGS map (Figure 35) the northwest end of Ilalo Street is shown ending at Keawe Street (at the south corner of the project area). A small square depicted on the northeast edge of the project area is understood as indicating the older Ala Moana #1 building (built in 1954) but the Ala Moana #2 building (built in 1983) is not depicted. A 2005 aerial photograph (Figure 36) depicts the present-day scene with Ilalo Street extended across the southwest side of the project area. The C&C Real Property Assessment Division website provides a year built for a warehouse on the property of 2000, notes a new building in 2010, and notes a permit for alteration in 2019. These post-1983 construction projects are believed to be relatively minor.
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Synopsis of Previous Archaeological Work in the Vicinity	Previous archaeological studies in the vicinity are depicted in Figure 37 and summarized in Table 1. Previously identified historic properties in the vicinity are located on Figure 38 and summarized in Table 2. Because historic maps conclusively indicate almost all of Kaka‘ako Makai (lands seaward of today’s Ala Moana Boulevard) is built on fill land, this area was of relatively little archaeological concern to the end of the twentieth century. Several studies (such as Tulchin and Hammatt 2010) would continue to regard the archaeological sensitivity of these fill lands as “low.” As a close study of the previously identified historic properties in the vicinity shows (Figure 38), there have actually been few historic properties identified in Kaka‘ako Makai (<i>makai</i> or southwest of Ala Moana Boulevard). The Kaka‘ako Pumping Station, just northeast of the project area is listed on the Hawaii Register of Historic places (HRHP) and National Register of Historic Places (NRHP) (State Inventory of Historic Places or SIHP # 50-80-14-09710); it was placed on the HRHP on 17 August 1997 and was listed on the NRHP on 4 October 1978 (#78001022). This site (SIHP # -09710 Feature 1 designates the main Pumping Station building) is of sufficient import that the project team should avoid any secondary impacts (such as adverse visual or auditory impacts) to this historically important building. The SIHP # # 50-80-14-08049 site designation just to the southwest of the project area includes a former bounding seawall (SIHP # -08049 Feature 1) and former constructions of Fort Armstrong (SIHP # -08049 Feature 2 and Feature 3). SIHP # 50-80-14-07788 designates a grouping of county buildings (14 designated features) dating to the 1920s and 1930s. SIHP # 50-80-14-07789 designates another former seawall of Kaka‘ako Makai 500 m to the southeast of the project area.
Fieldwork Effort	A brief field inspection of the project area was conducted by CSH archaeologist David W. Shideler, M.A., on 23 December 2025. The field inspection was completed to identify the likelihood of historic properties being present within the project area. The field inspection took approximately 1 hour. An archaeologist’s tracklog with a key to the following photographs indicating approximately where they were taken and their orientation is provided in Figure 39. The photographic documentation of present conditions starts from the entry driveway and generally proceeds counterclockwise around the facility. The main access driveway is on the central southeast side of the project area fronting Keawe Street (Figure 40). A sign on the southwest side of the entry driveway reads “ALA MOANA WASTEWATER PUMP STATION DIVISION OF WASTEWATER MANAGEMENT DEPARTMENT OF

	PUBLIC WORKS CITY AND COUNTY OF HONOLULU 210 KEAWE STREET” (Figure 41). It was quickly confirmed that the project area is almost entirely paved and is dominated by two buildings, the older (1954) Ala Moana # 1 building in the central northeast side and the newer (1983) Ala Moana # 2 building in the central southwest side. Particular attention was given to documenting these two buildings to facilitate any architectural review of them as possible historic properties. These two buildings are quite similar. A view is presented of the southeast end of the Ala Moana # 1 building (Figure 42) which bears a sign providing the construction date: “ALA MOANA #1 (1954)” (Figure 43). General views are provided of the project area from the east corner (Figure 44) and from the north corner (Figure 45) showing the general conditions of concrete and asphalt paving with some areas of compacted basalt gravel. A view of the back (northwest short side) of the (1954) Ala Moana #1 building is provided in Figure 46. Moving on to the central northwest side of the project area, a view is provided of the back (northwest side) of the (1983) Ala Moana #2 building (this is the portion of the facility understood as the focus of the Improvements Project) (Figure 47). At the west corner of the project area is an open pit area of piping infrastructure (Figure 48 and Figure 49). The south corner has a small area of exotic tree landscaping and provides a view of the long southeast side of Ala Moana #2 building (Figure 50 and Figure 51). There was another subsurface area of piping infrastructure in this south corner (Figure 52). Continuing on to the central paved driveway between the two buildings, a view is provided of the northeast end and long southeast side of the (1983) Ala Moana #2 building (Figure 53) and of the similar-appearing southwest side of the Ala Moana #1 building (Figure 54). A close-up view of the “ALA MOANA #2 (1983)” sign on the east corner of the Ala Moana # 2 building is provided (Figure 55). Views are provided of the long southwest side of the Ala Moana #1 building (Figure 56) and of the northeast side of the Ala Moana #2 building (Figure 57).
Historic Properties Potentially Affected	A review of historic documentation indicates the project area was offshore coral reef shallows to the end of the 1800s (Figure 16), and possibly as late as 1909 (Figure 17, the 1891 Dodge map, clearly depicts neighboring structures of a much later date). We show the first structures as a “crematory” accessed by a “trestle for wagons” in the project area on maps dated 1891 (although this may be a later addition; Figure 15), 1911 (Figure 18), and 1922 (Figure 23). Whether any remnant of the indicated crematory—such as foundations of the indicated building and pier and trestles for wagons, remnants of the “mechanism,” remnants of the “three hoppers,” or remnants of the two smoke stacks—is present in the project area or buried under fill of the project area is uncertain. The focus of the Improvements Project on the northwest side of the facility (see Figure 4, Figure 5, and Figure 47 would

	appear to have little likelihood of encountering remnants of the former crematory. It appears the fill land of the project area was part of Fort Armstrong and the project area included structures of Fort Armstrong as late as 1957 (Figure 31). Whether any significant remnant of these former Fort Armstrong structures (foundations, former utility lines) remain extant is uncertain. No archaeological historic properties have been reported within or adjacent to the Ala Moana No. 1 WPS Improvements project area and none were observed during the fieldwork. The Kaka'ako Pumping Station (SIHP # -09710) parcel is adjacent to the northeast. This NRHP-listed structure is of sufficient import that care should be taken that the present project does not pose any indirect (visual or auditory) adverse effects to this site. In a neighboring parcel just 100 m to the southwest three features of designated SIHP # -08049 were identified (subsurface structural remnants associated with Fort Armstrong located within the vicinity of the project area beginning in 1909 and extending into the 1950s). The fill underlying the project area may include burned municipal refuse dating to the early twentieth century.
Discussion of Project Effect and Recommendations	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. No historic properties have been previously identified in the project area and none, other than possibly the (1954) Ala Moana # 1 building, were identified in the present study. Consultation with the SHPD architecture branch is recommended regarding any possible concern for indirect adverse impacts to the Kaka'ako Pumping Station (SIHP # 09710).

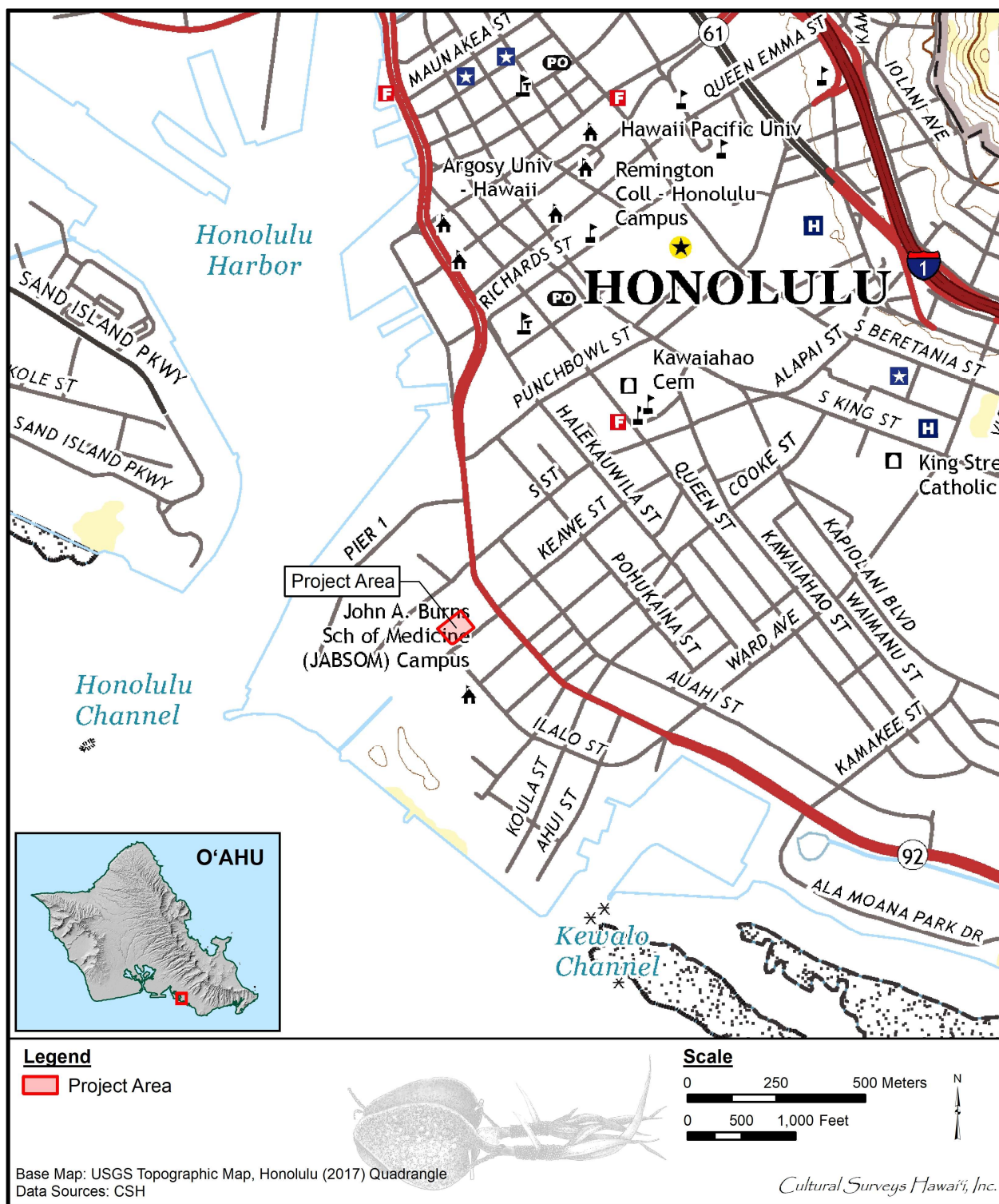


Figure 1. Portion of a 2017 Honolulu USGS 7.5-minute topographic quadrangle map showing the project area



TMK: (1) 2-1-015:062



Figure 3. 2023 Google Earth aerial photograph showing the project area

LRFI for the Ala Moana No. 1 WPS Improvements Project, 210 Keawe St, Kaka'ako Makai, Honolulu, O'ahu

TMK: (1) 2-1-015:062

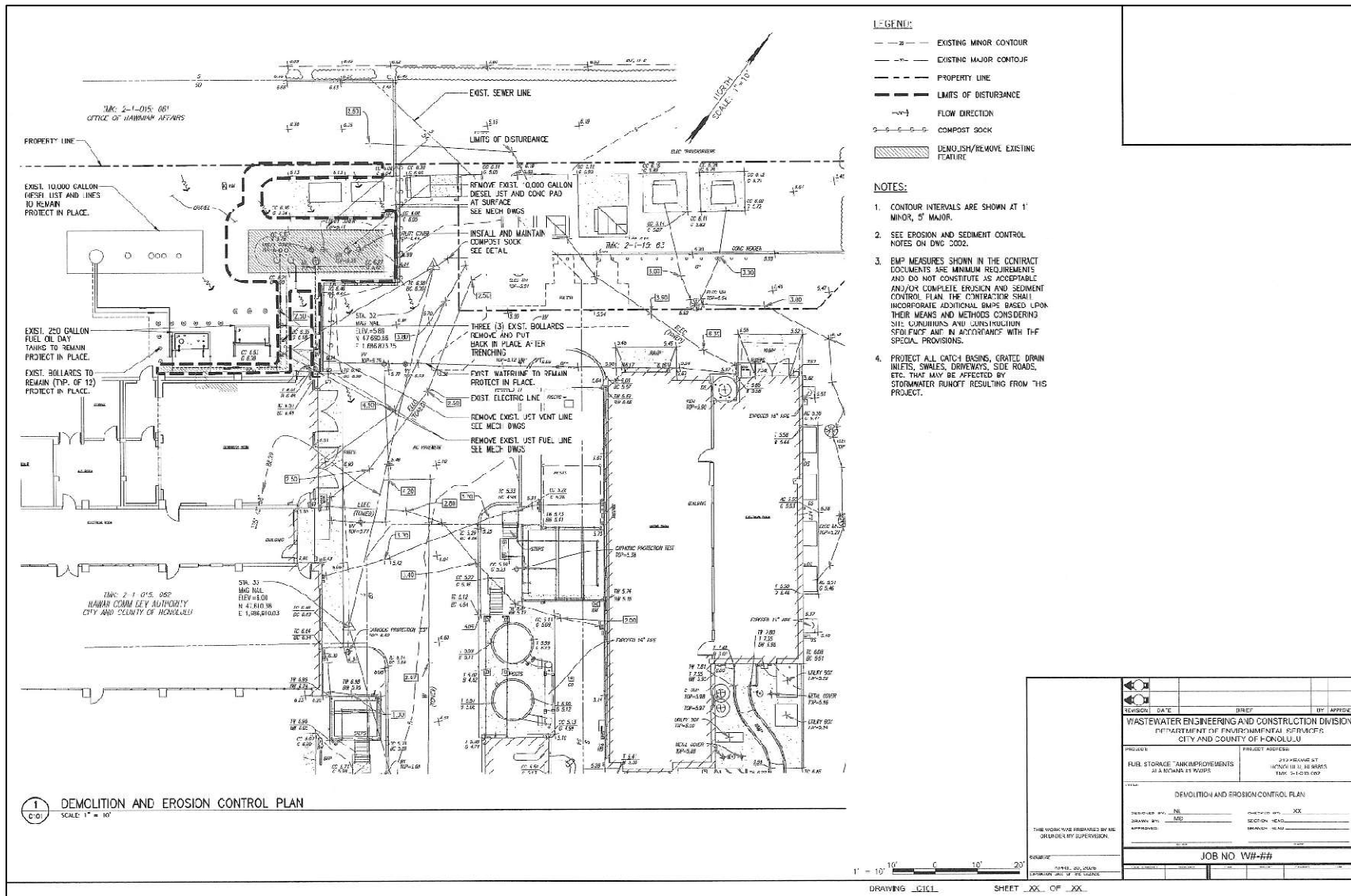
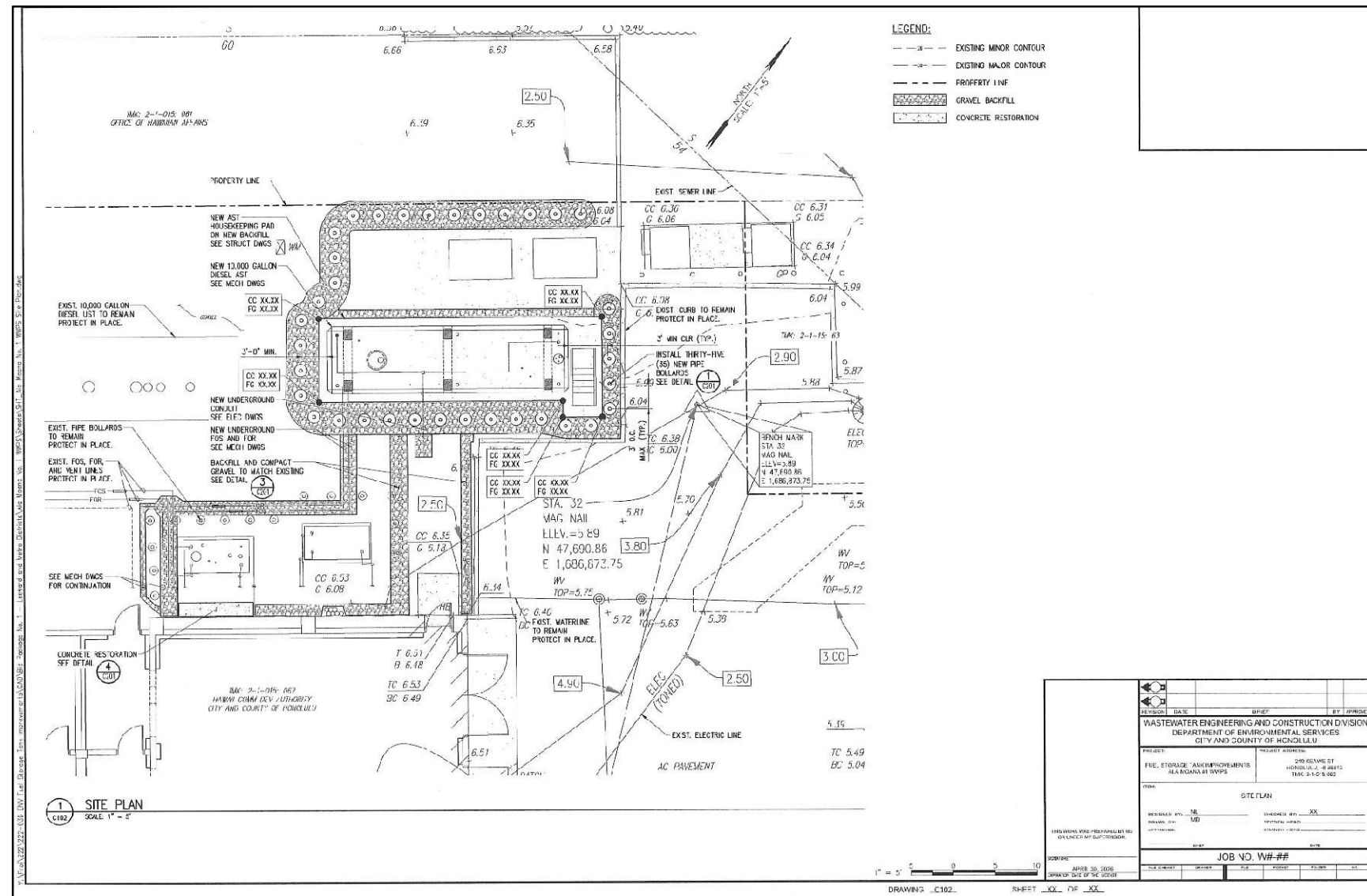


Figure 4. Demolition and Erosion Control Plan for the Ala Moana No. 1 WPS Improvements Project (provided by client)

LRFI for the Ala Moana No. 1 WPS Improvements Project, 210 Keawe St, Kaka'ako Makai, Honolulu, O'ahu

TMK: (1) 2-1-015:062

LRFI for the Ala Moana No. 1 WPS Improvements Project, 210 Keawe St, Kaka'ako Makai, Honolulu, O'ahu
TMK: (1) 2-1-015:062



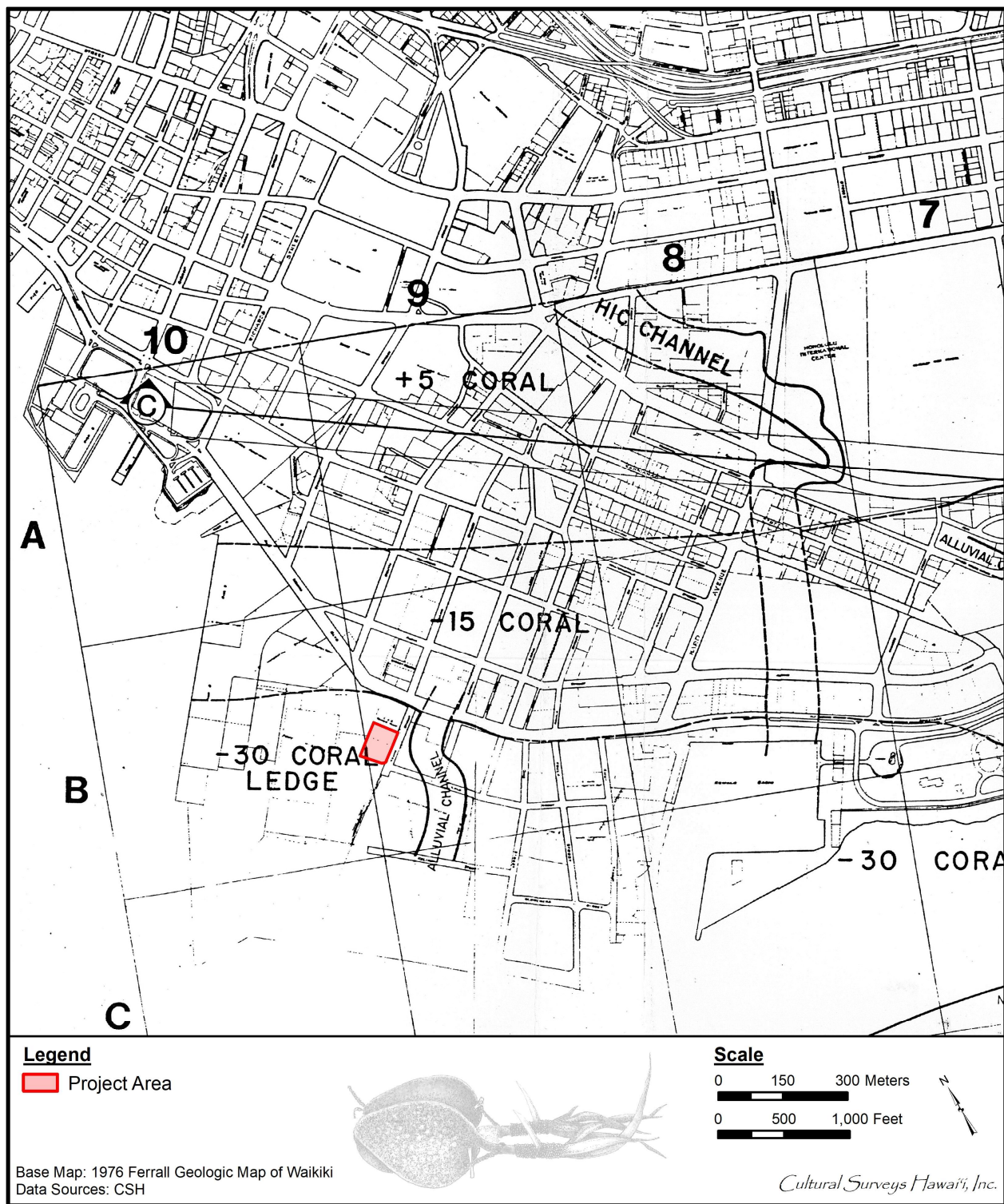


Figure 6. Portion of the 1976 Ferrall geologic map of Waikiki showing the location of the Ala Moana No. 1 WPS Improvements project area



Figure 7. 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 Ala Moana No. 1 WPS Improvements project area on a portion of a 2017 Honolulu USGS 7.5-minute topographic quadrangle

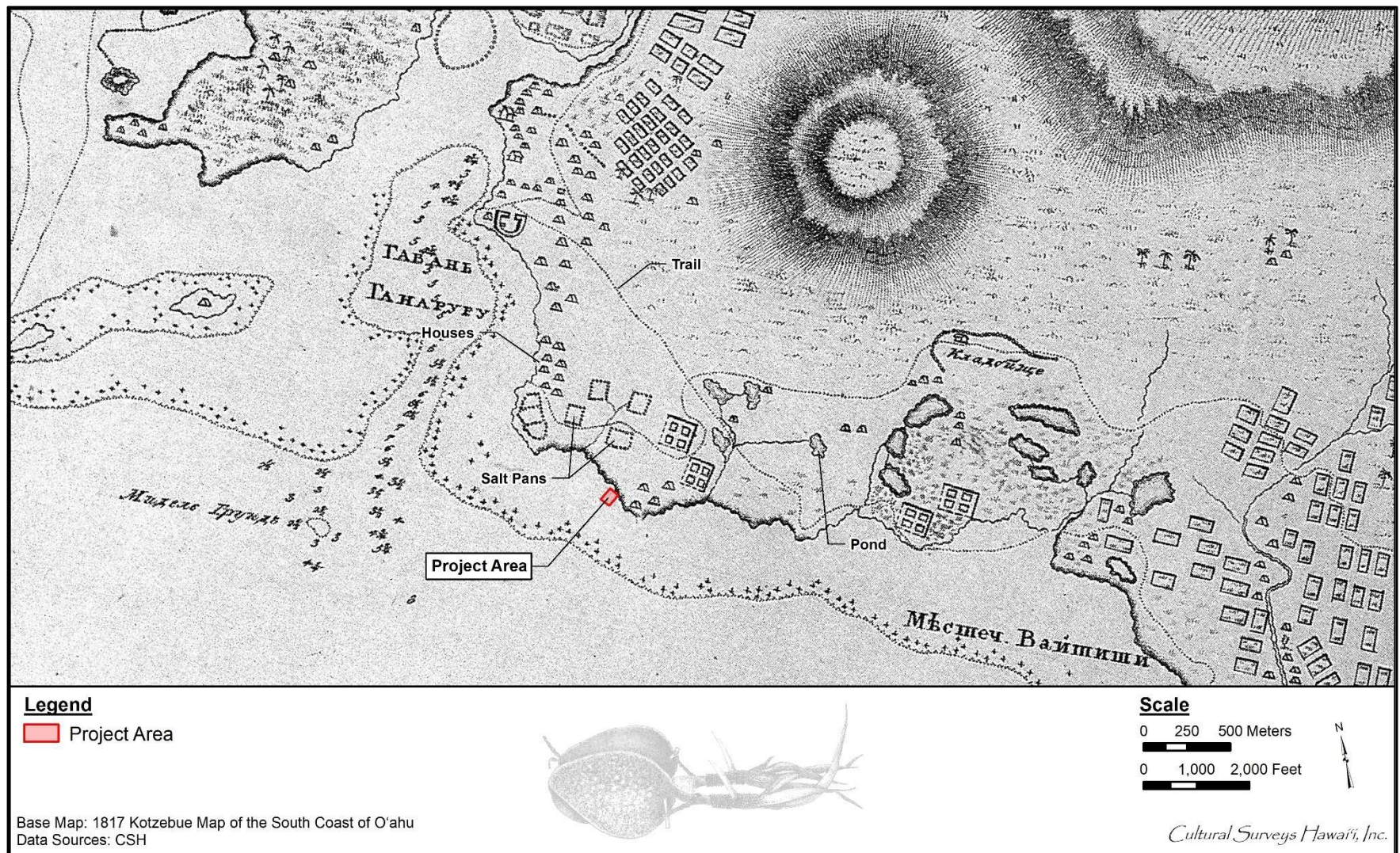


Figure 8. Portion of 1817 map by Otto von Kotzebue, commander of the Russian ship *Rurick*, showing fishponds and salt pans in the vicinity of the Ala Moana No. 1 WPS Improvements project area (map reprinted in Fitzpatrick 1986:48–49)

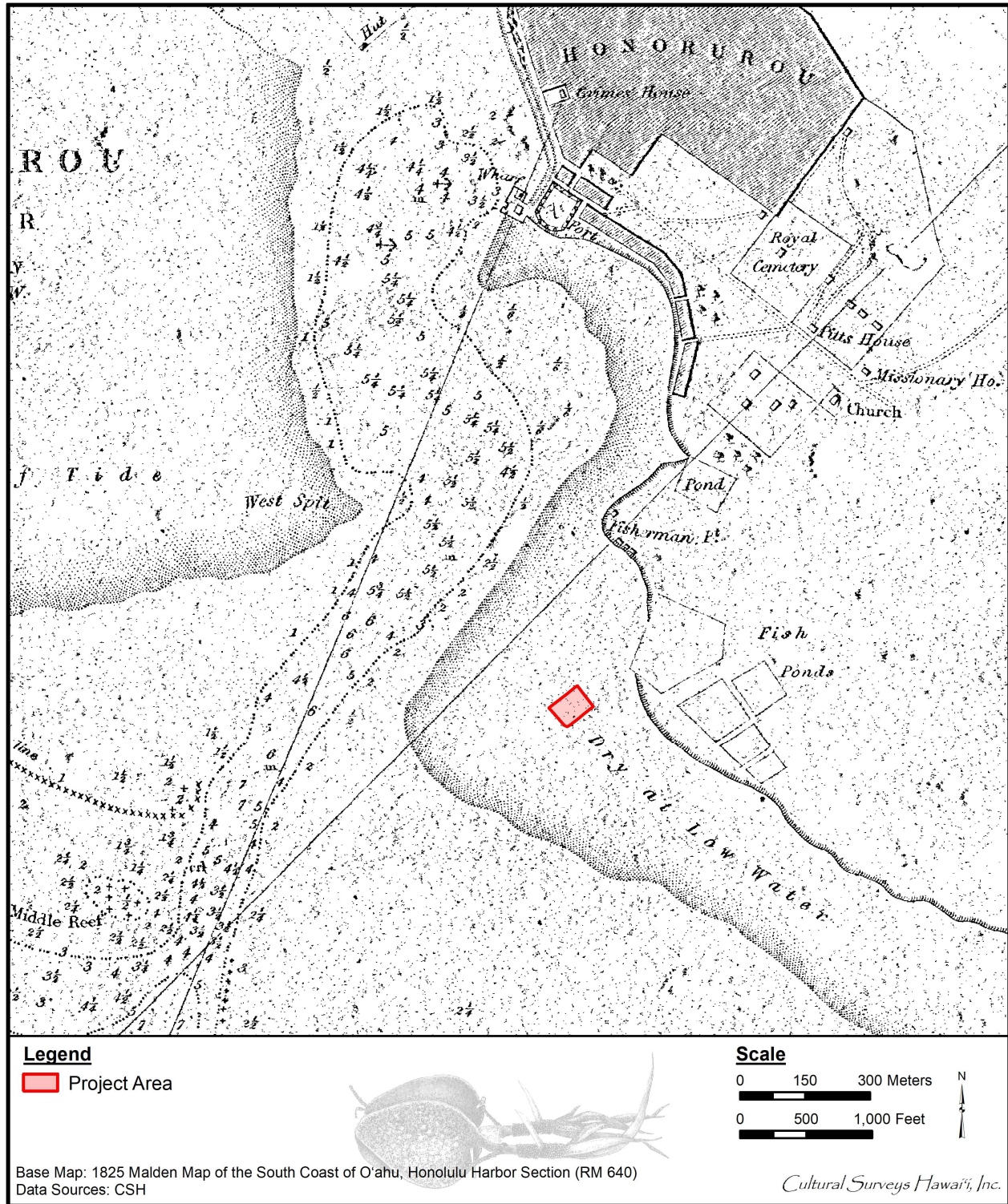


Figure 9. Portion of the 1825 Malden map of the south coast of O'ahu, Honolulu Harbor Section (RM 640) showing the location of the Ala Moana No. 1 WPS Improvements project area

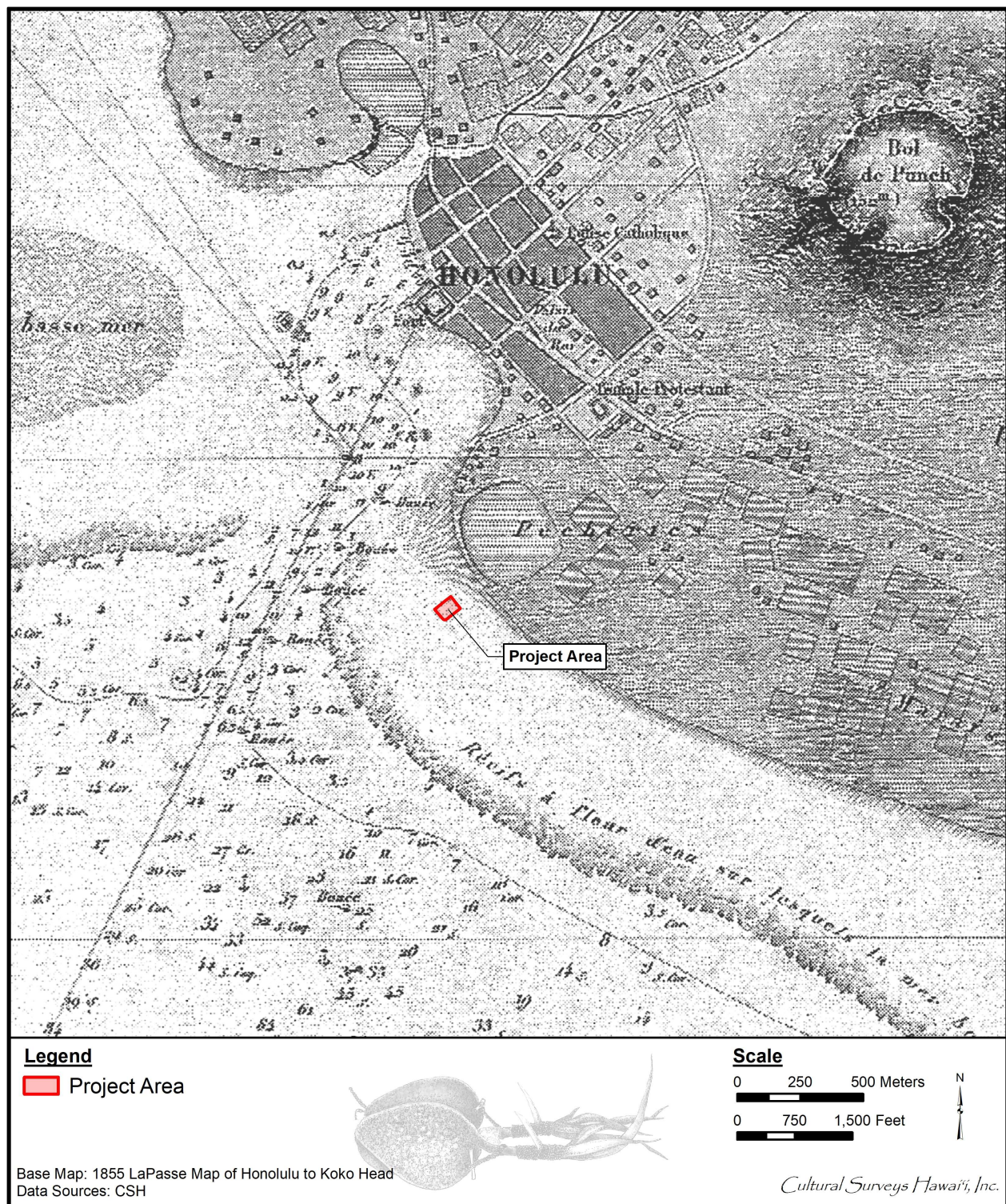


Figure 10. Portion of 1855 map of Honolulu by Lt. Joseph de LaPasse of the French vessel, *L'Eurydice*; showing the location of the Ala Moana No. 1 WPS Improvements project area southeast of an area labeled “*Pecheries*” (“Fishponds”) (map reprinted in Fitzpatrick 1986:82–83)

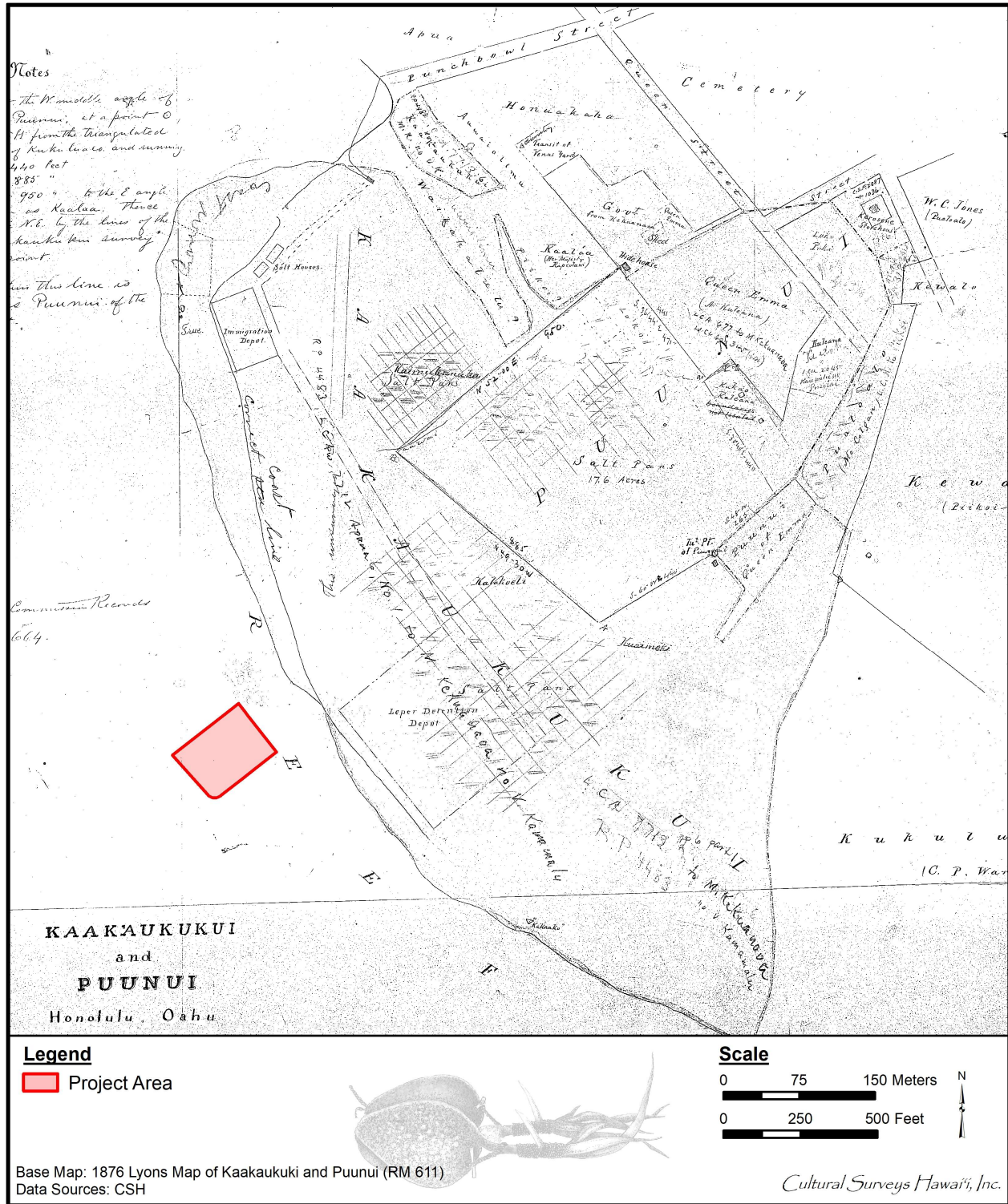


Figure 11. Portion of 1876 Lyons map of Kaakaukui and Puunui (RM 611) showing the location of the Ala Moana No. 1 WPS Improvements project area



Figure 12. Portion of the 1881 Oahu Island Government survey map by R. Covington (RM 1381) indicating the project area; note extensive “Kakaako Salt Works” just inland of the location of the Ala Moana No. 1 WPS Improvements project area

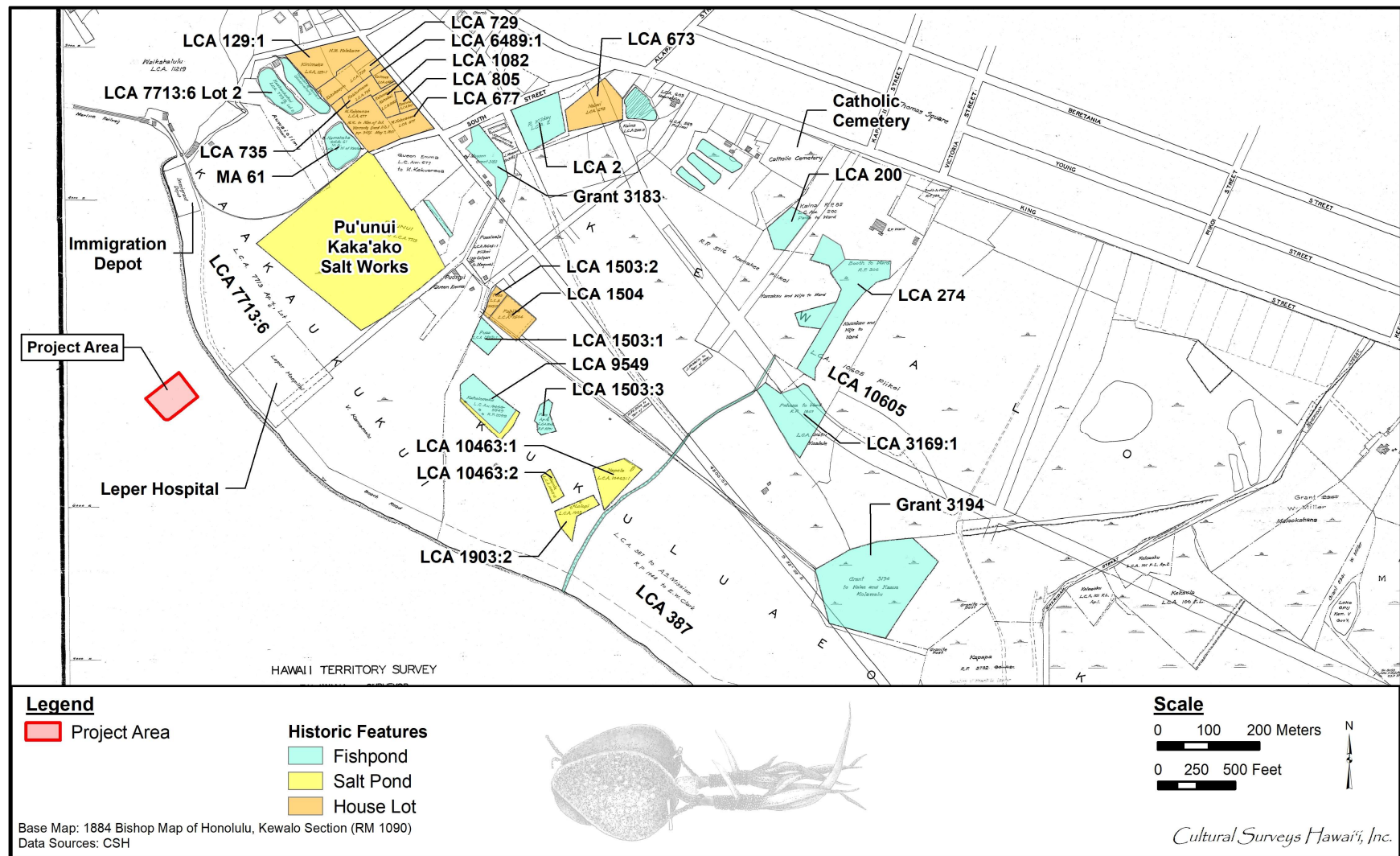


Figure 13. 1884 map of Honolulu, Kewalo Section map by Sereno Bishop (RM 1090), showing Land Commission Awards near the Ala Moana No. 1 WPS Improvements project area; note in the extreme northern tip of the study area the Waikahalu'u lands filled in ca. 1887

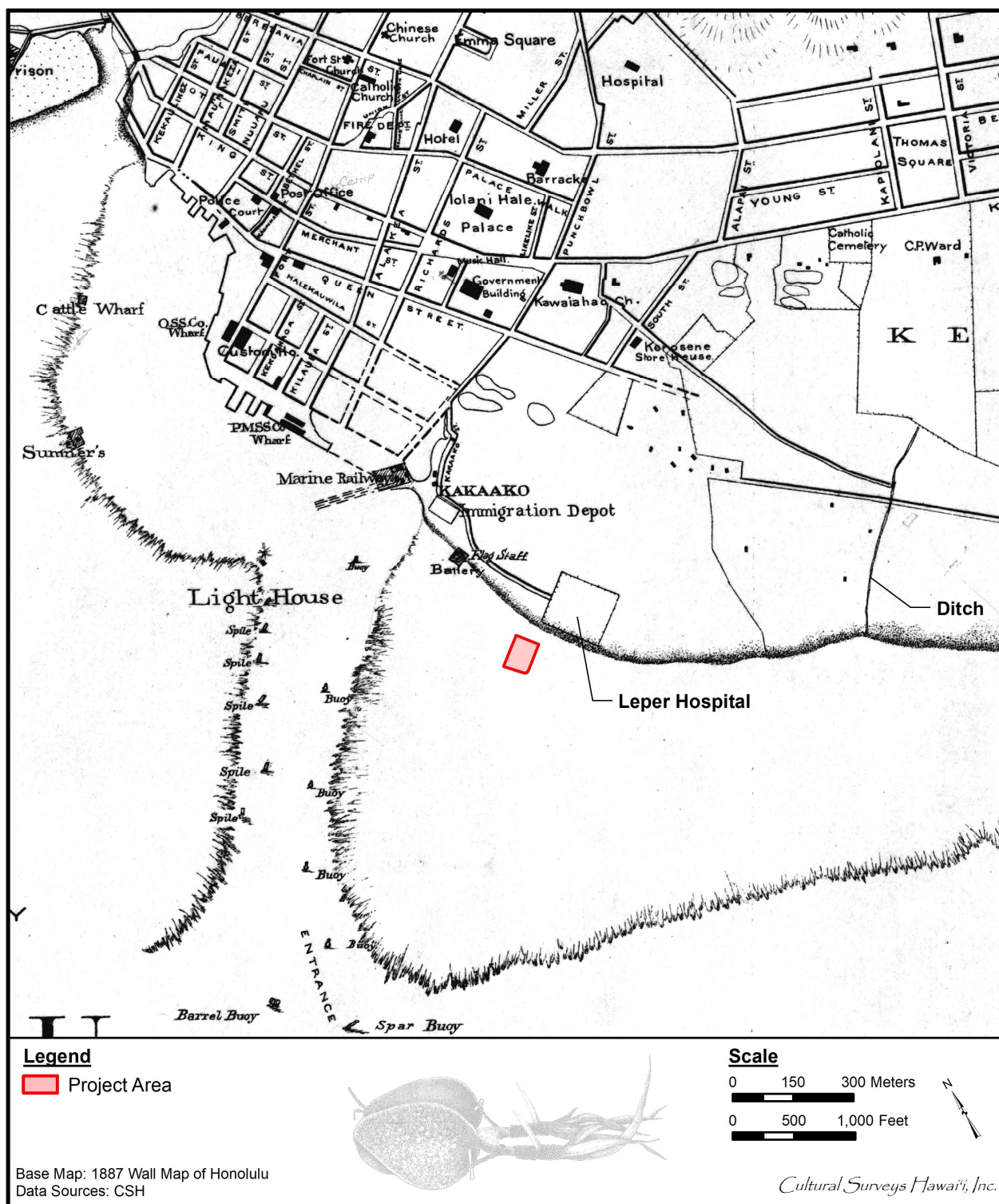


Figure 14. Portion of 1887 Wall map of Honolulu showing the location of the Ala Moana No. 1 WPS Improvements project area

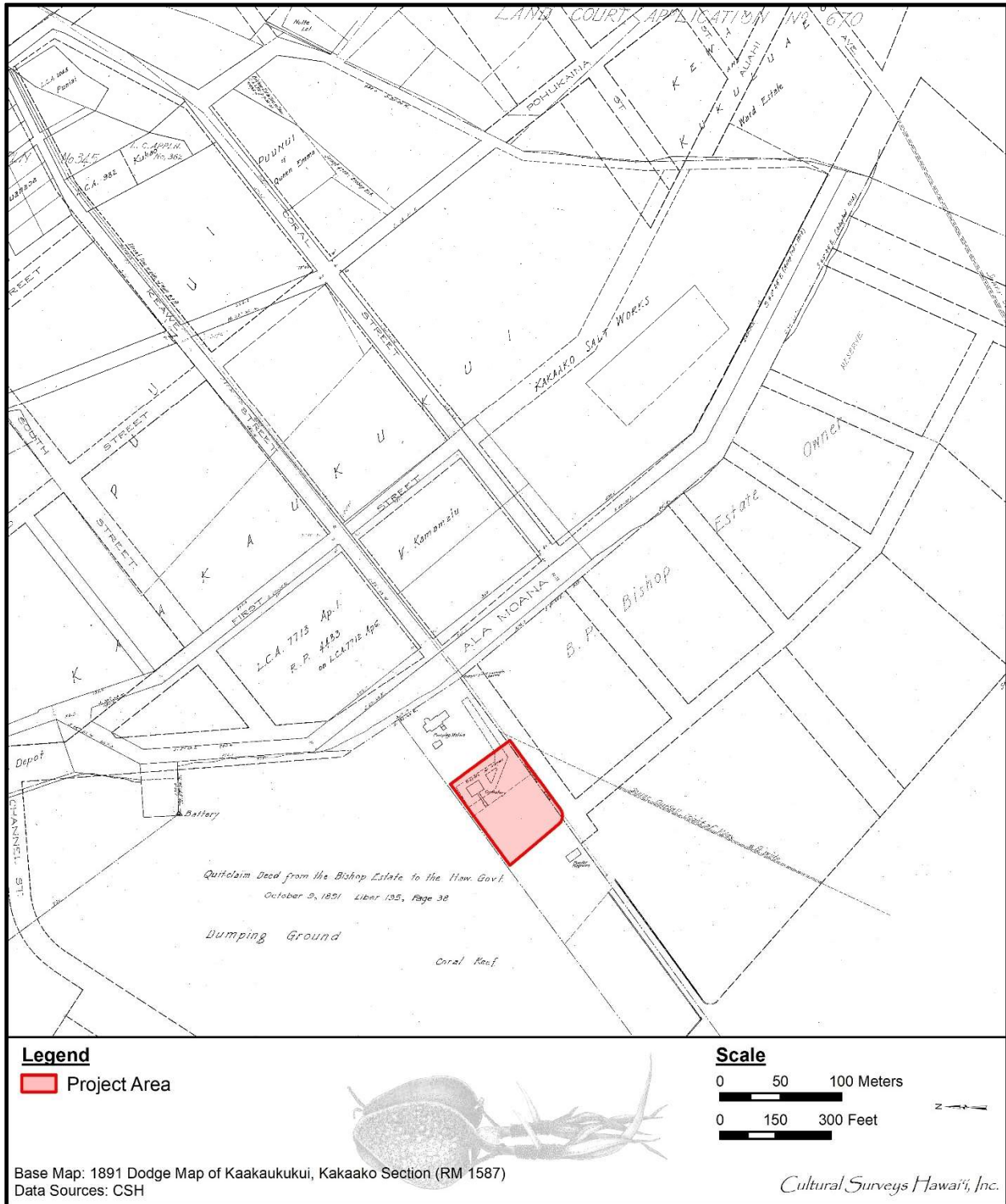


Figure 15. Portion of 1891 Dodge map of Kaakaukui, Kakaako Section (RM 1587) showing the location of the Ala Moana No. 1 WPS Improvements project area

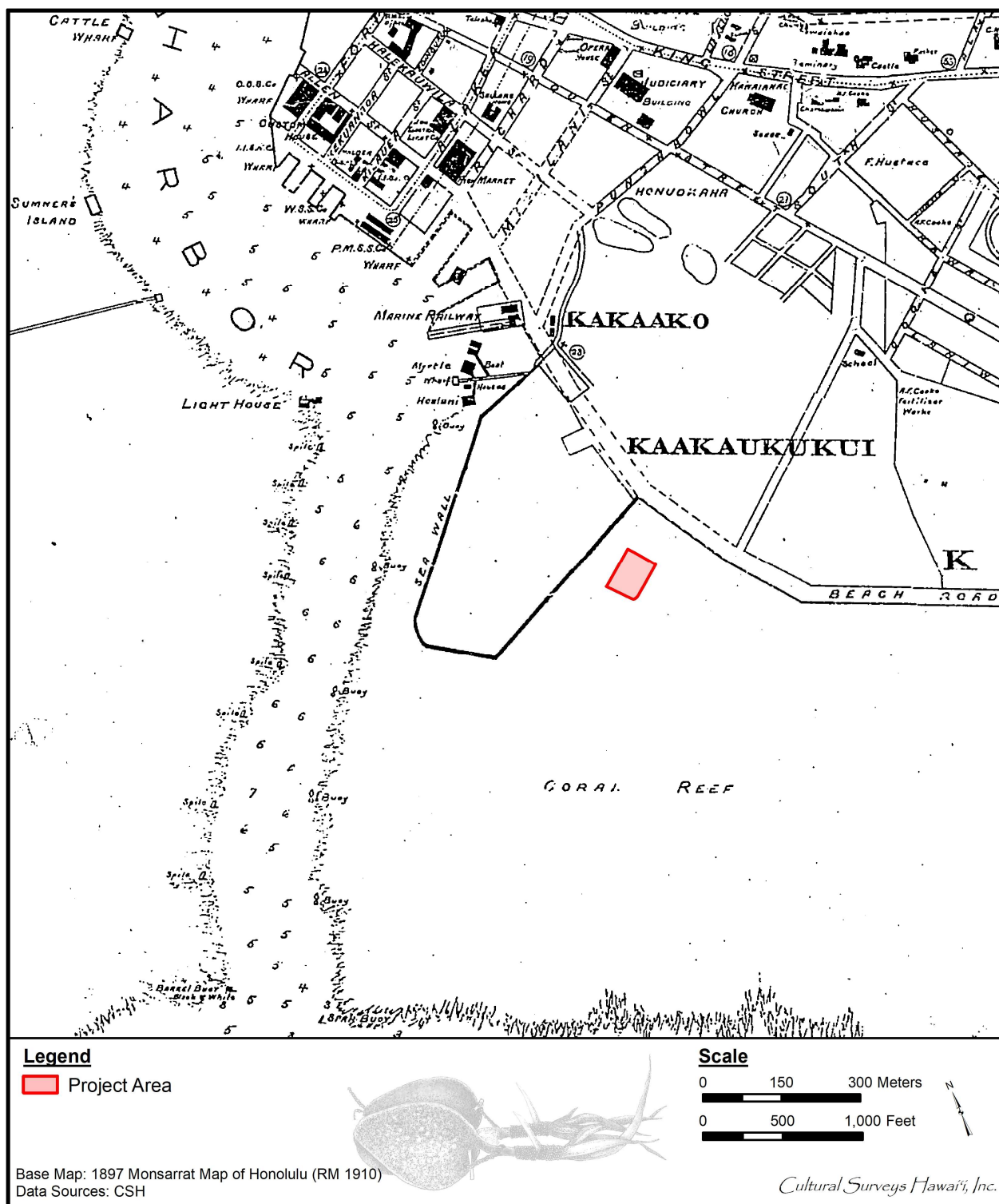


Figure 16. Portion of the 1897 Monsarrat map of Honolulu (RM 1910) showing the location of the Ala Moana No. 1 WPS Improvements project area

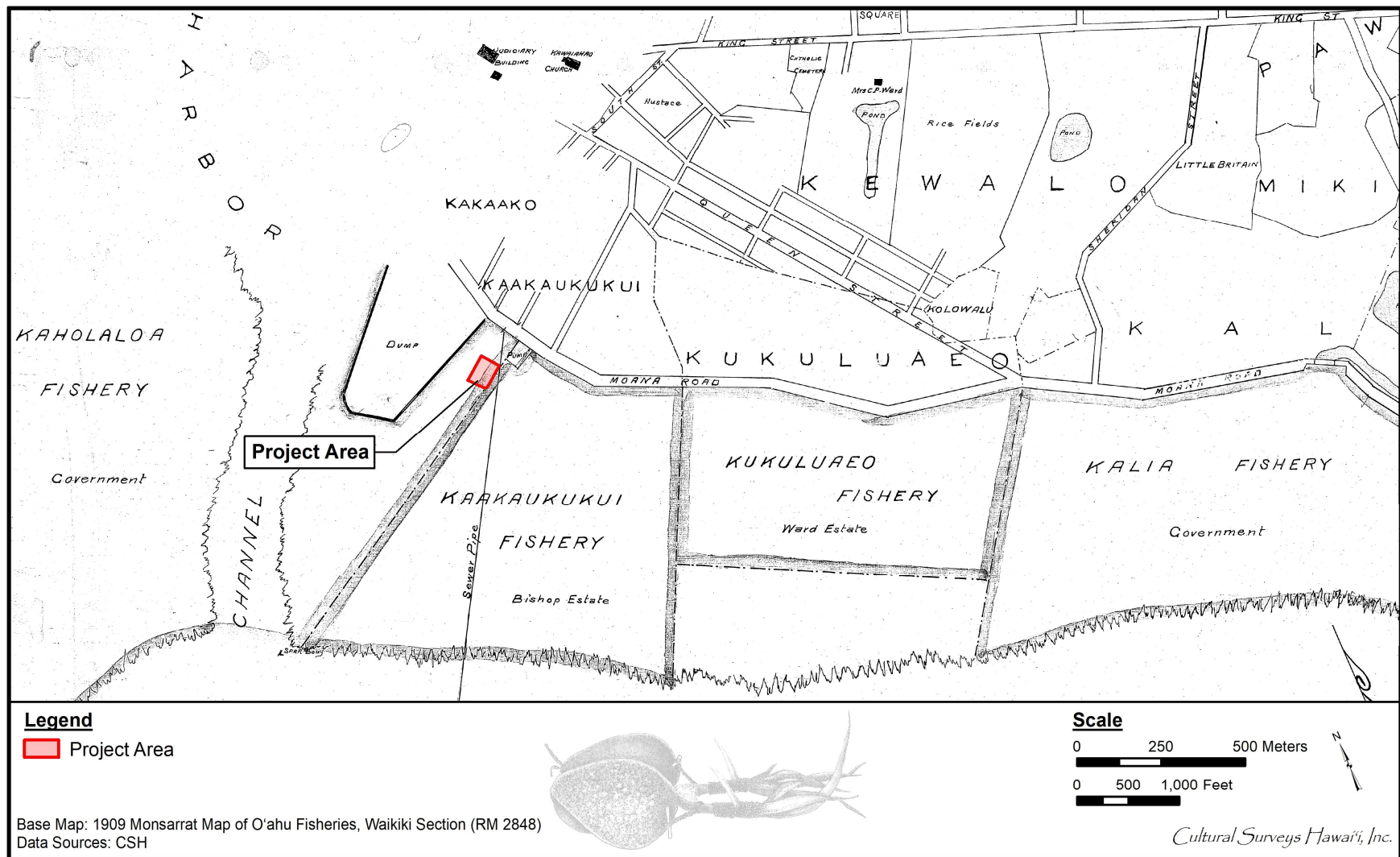


Figure 17. Portion of 1909 Monsarrat map of Oahu Fisheries, Waikiki Section (RM 2848) showing the location of the Ala Moana No. 1 WPS Improvements project area

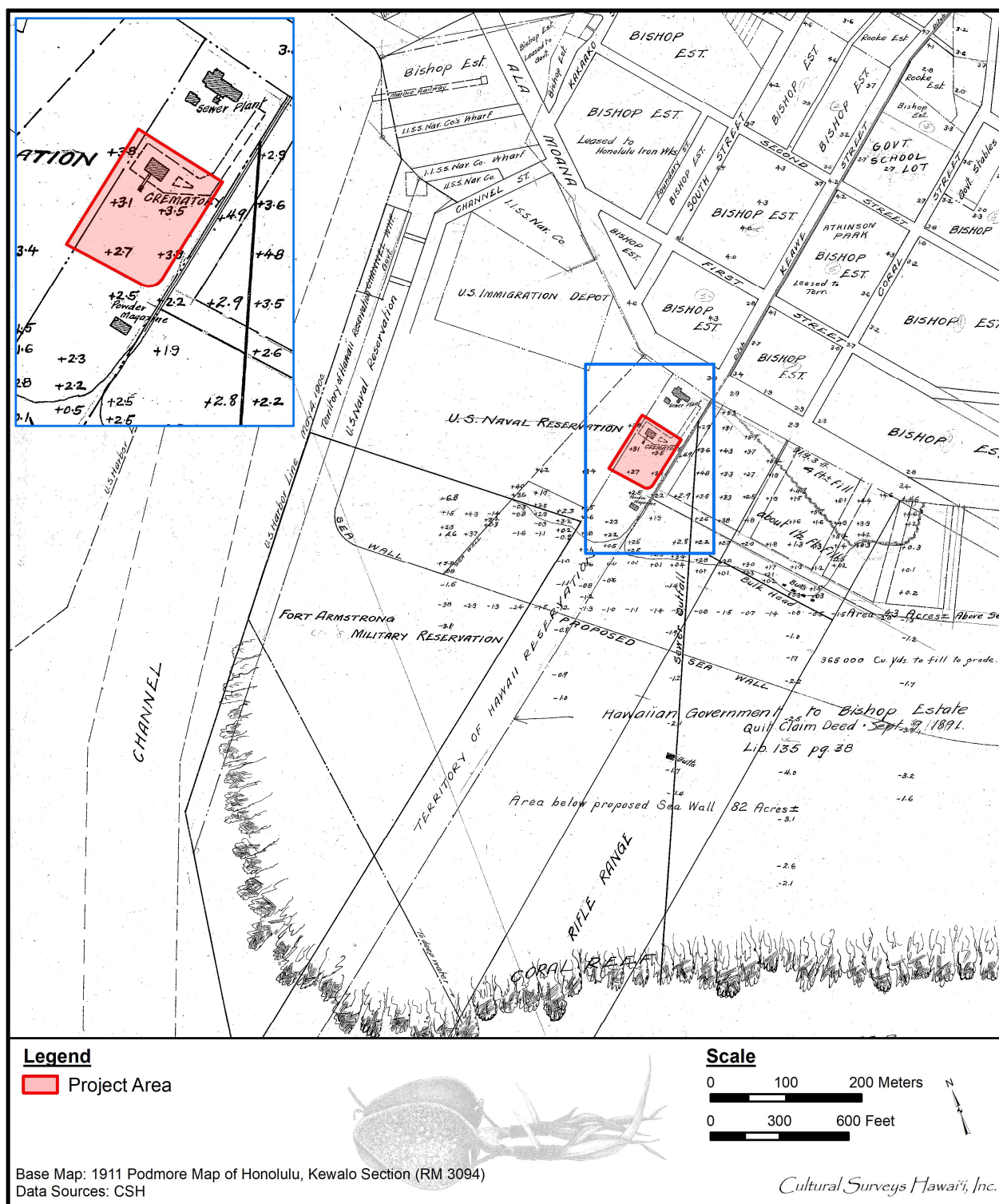


Figure 18. Portion of 1911 G. Podmore map of “Honolulu, Kewalo Section” (RM 3094) showing the location of the Ala Moana No. 1 WPS Improvements project area; note the bounding seawall at the southwest side of the project area is only “proposed”



Figure 19. Colorized postcard (ca. 1911-1920) of Fort Armstrong (original black and white photograph at Hawai'i State Archives; reprinted in Wisniewski 1984:18)

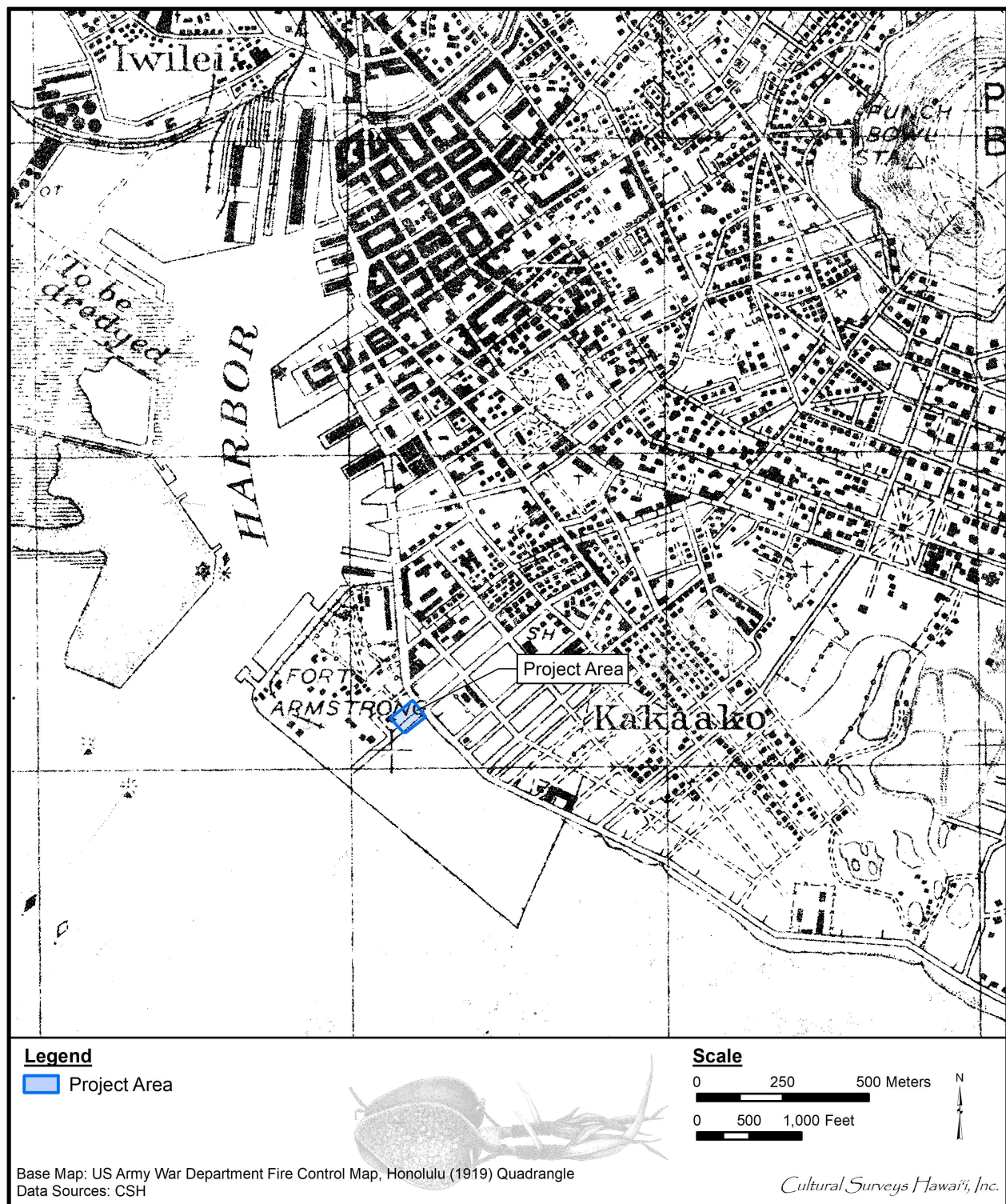


Figure 20. Portion of 1919 U.S. Army War Department fire control map, Honolulu quadrangle showing the location of the Ala Moana No. 1 WPS Improvements project area

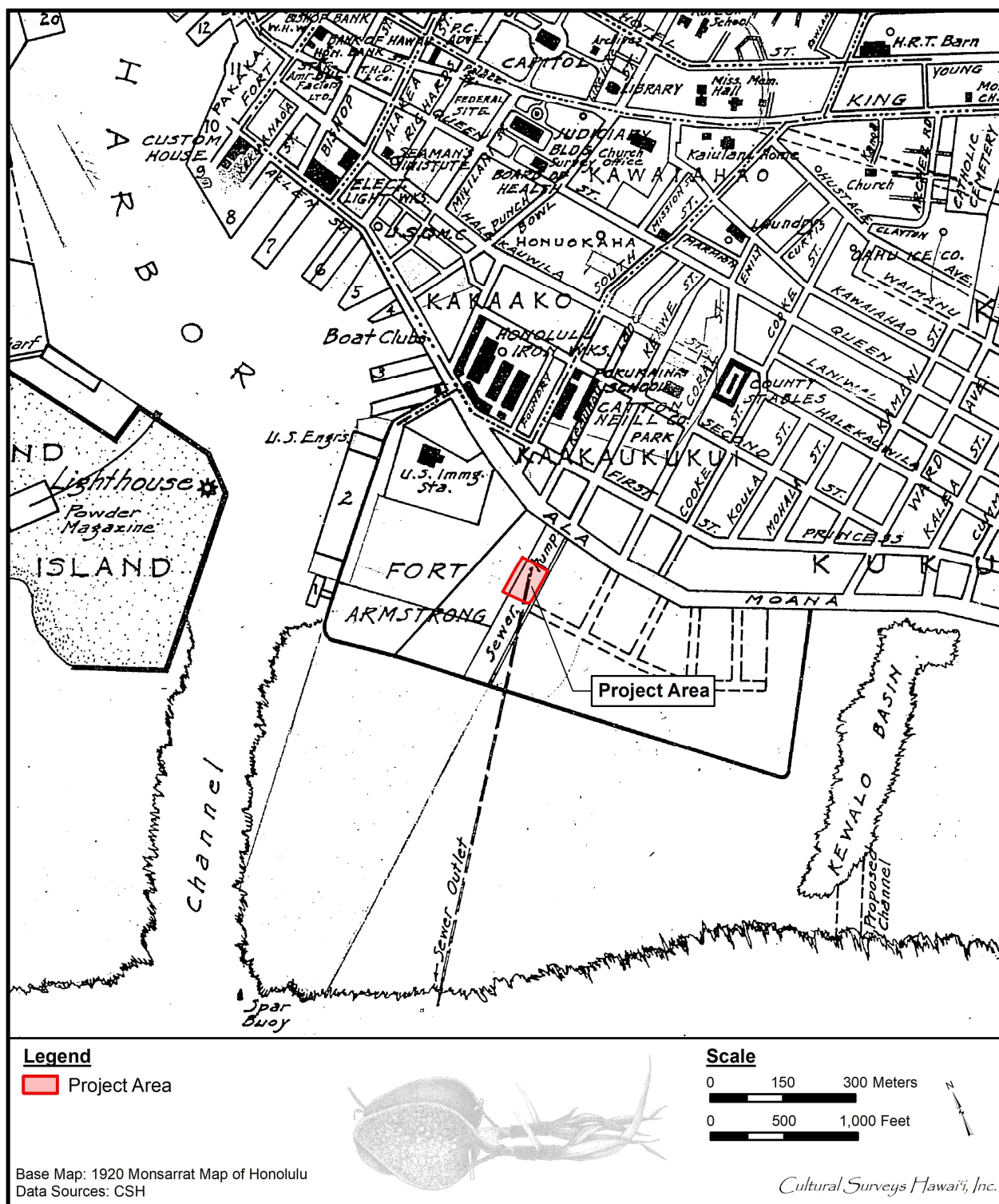


Figure 21. Portion of 1920 Monsarrat map of Honolulu showing the location of the Ala Moana No. 1 WPS Improvements project area

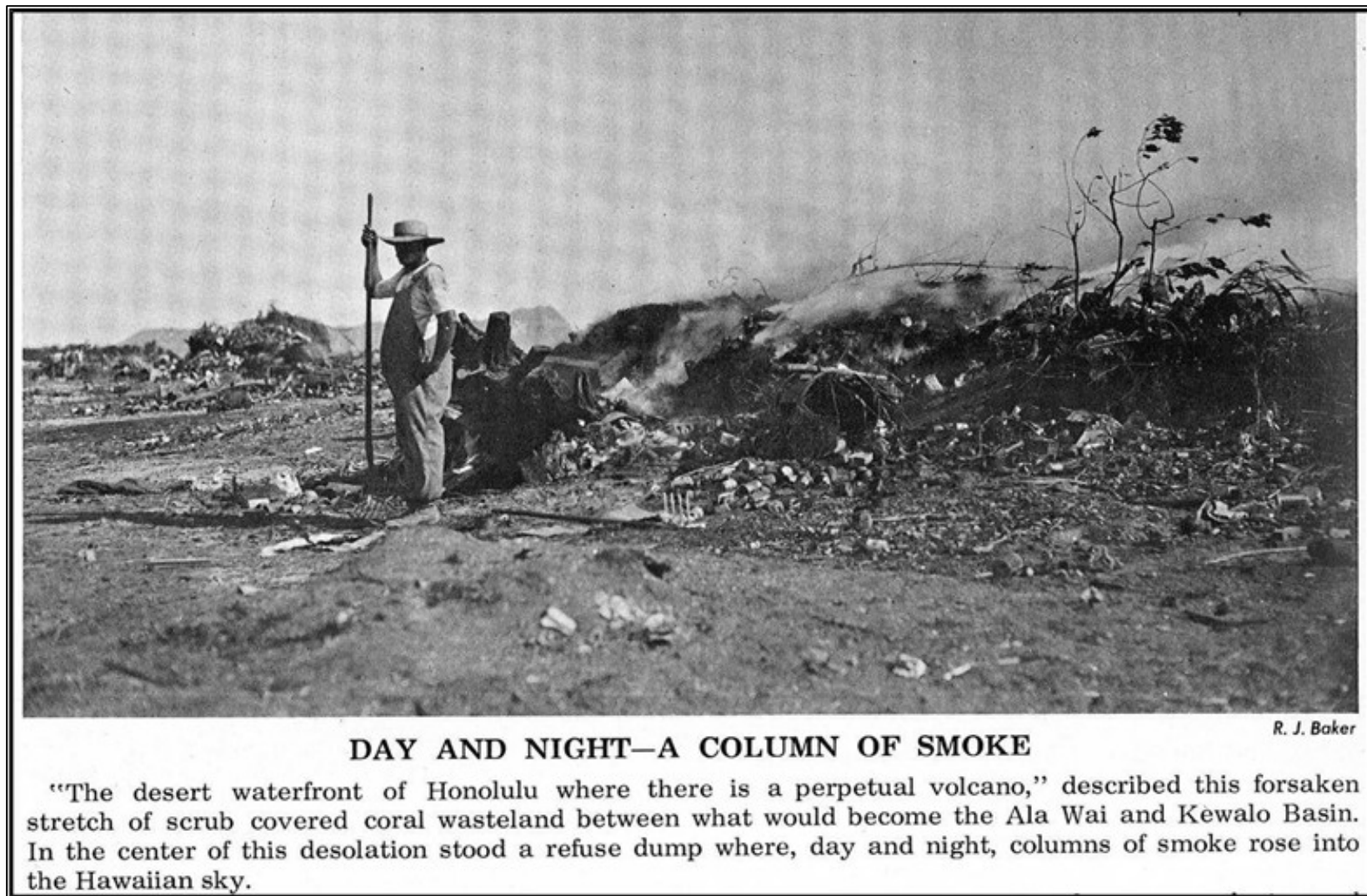


Figure 22. 1921 photograph of a city worker supervising open burning of trash understood to be on the west side of Kewalo Basin (original photograph by Ray Jerome Baker, reprinted in Scott 1968:578)

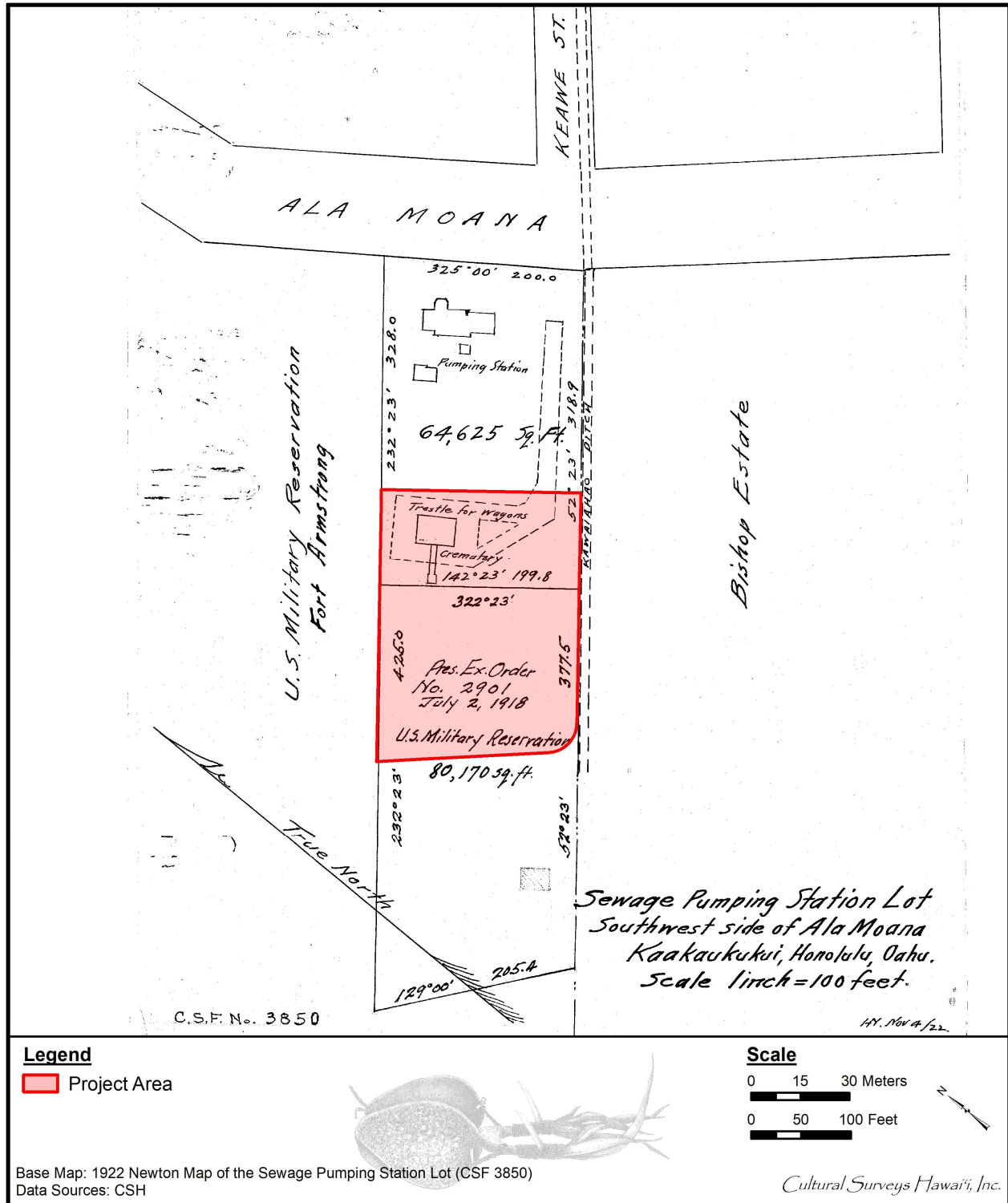


Figure 23. Portion of 1922 Newton map of the Sewage Pumping Station Lot (CSF 3850) showing the location of the Ala Moana No. 1 WPS Improvements project area

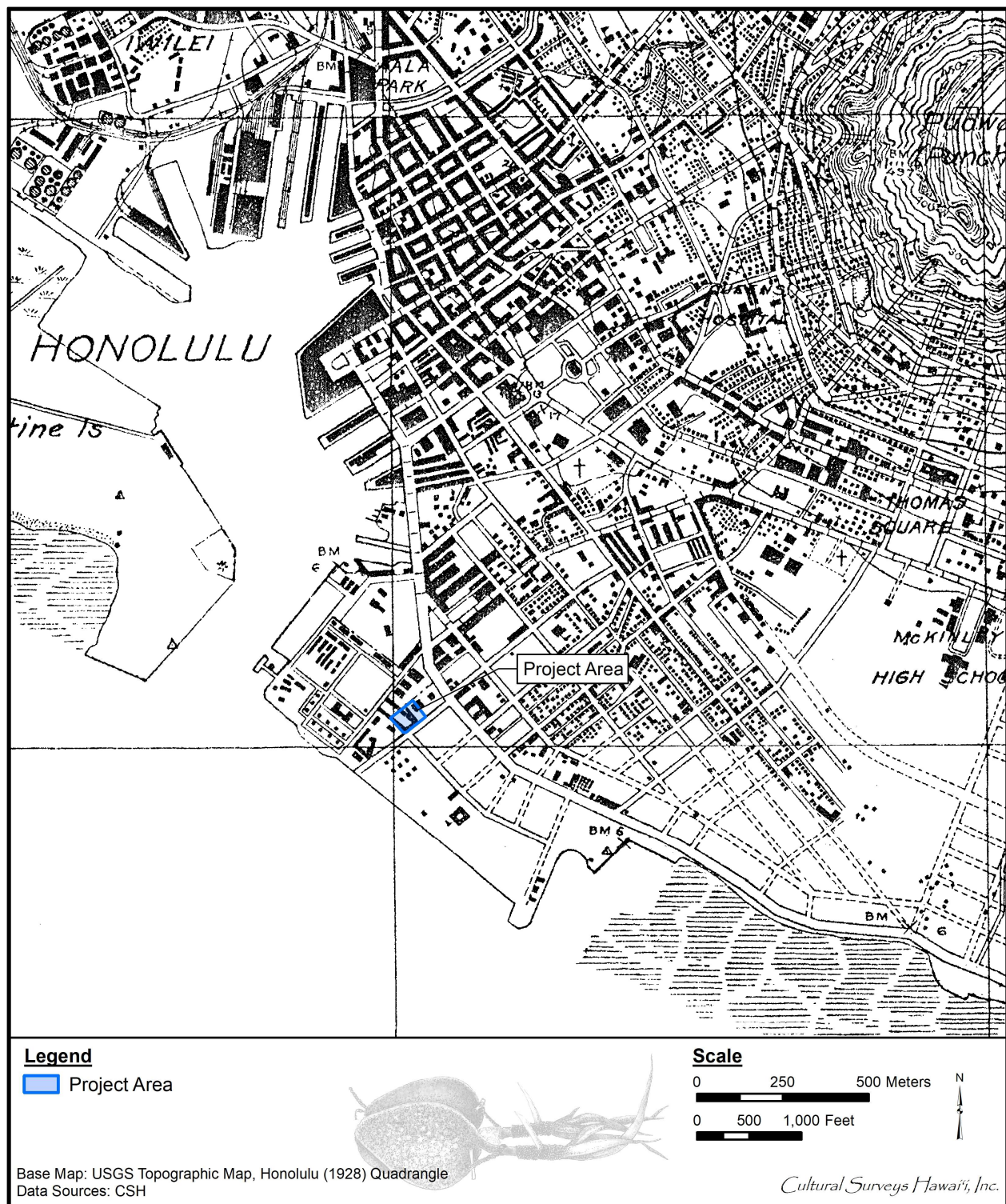


Figure 24. Portion of the 1928 Honolulu USGS topographic map showing the location of the Ala Moana No. 1 WPS Improvements project area

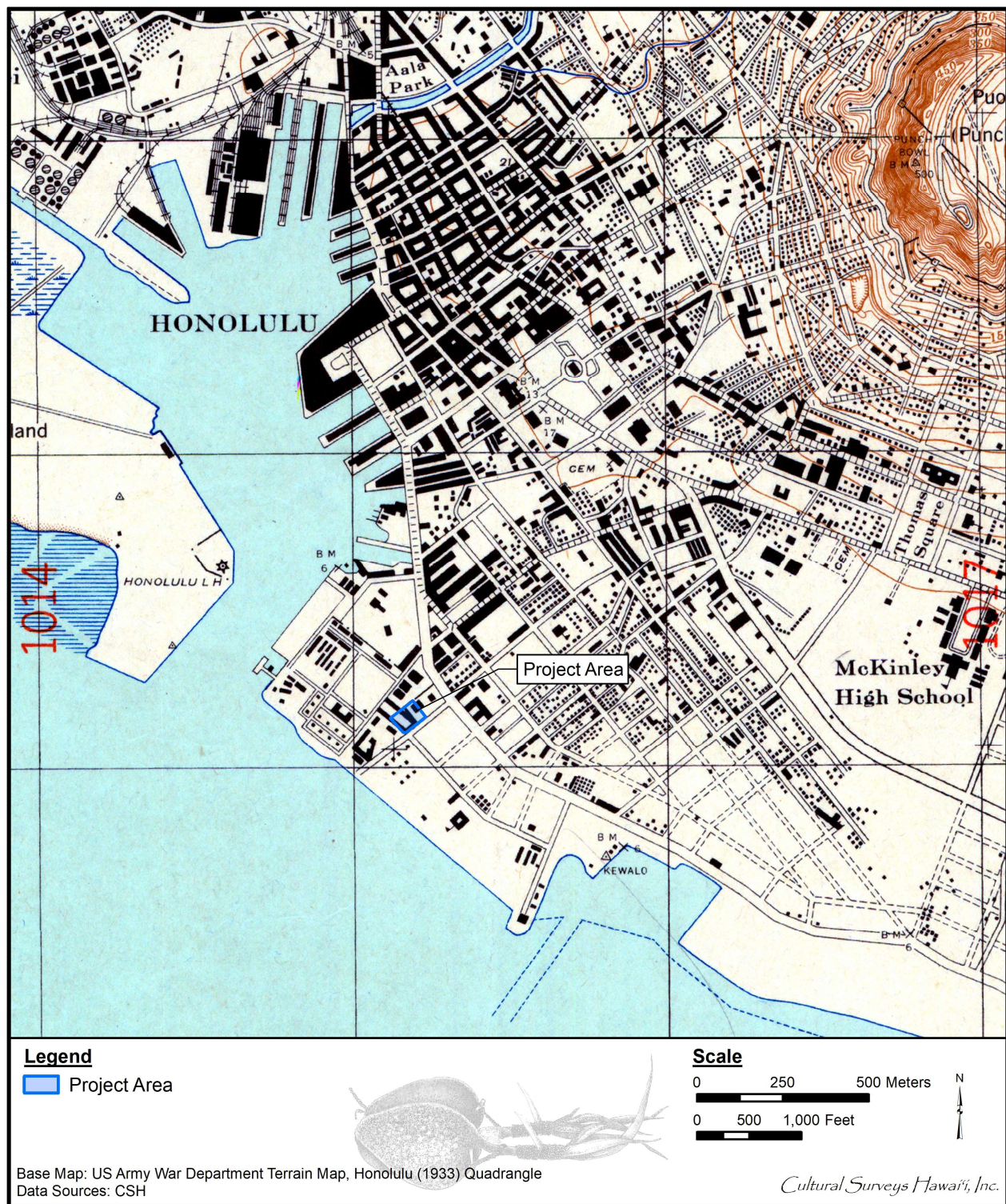


Figure 25. Portion of 1933 U.S. Army War Department fire control map, Honolulu quadrangle showing the location of the Ala Moana No. 1 WPS Improvements project area



Figure 26. Portion of 1939-1941 U.S. Army Air Corps aerial photograph of the Kakaako Coast showing the Ala Moana No. 1 WPS Improvements project area

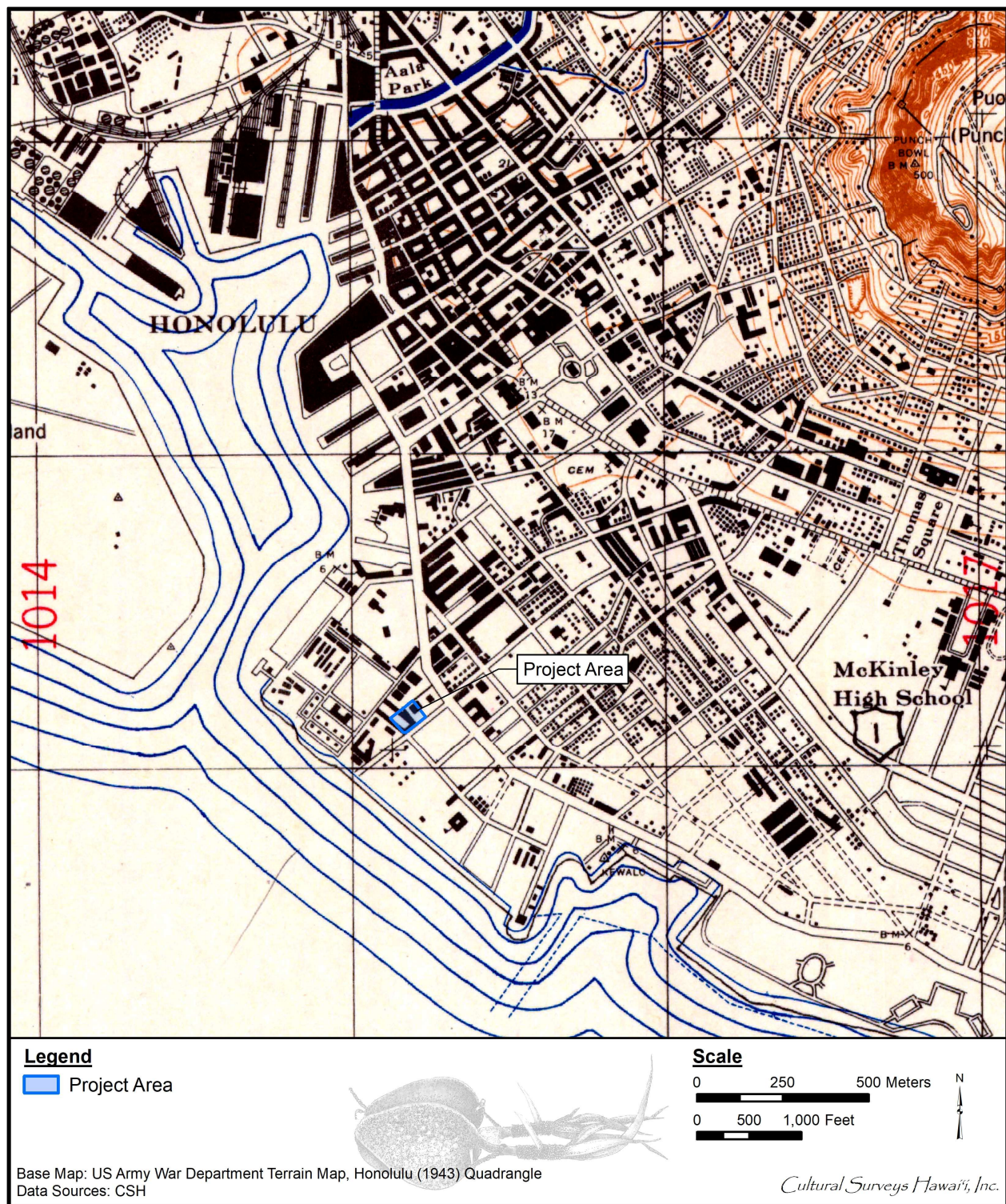


Figure 27. Portion of 1943 U.S. Army War Department terrain map, Honolulu quadrangle showing the location of the Ala Moana No. 1 WPS Improvements project area

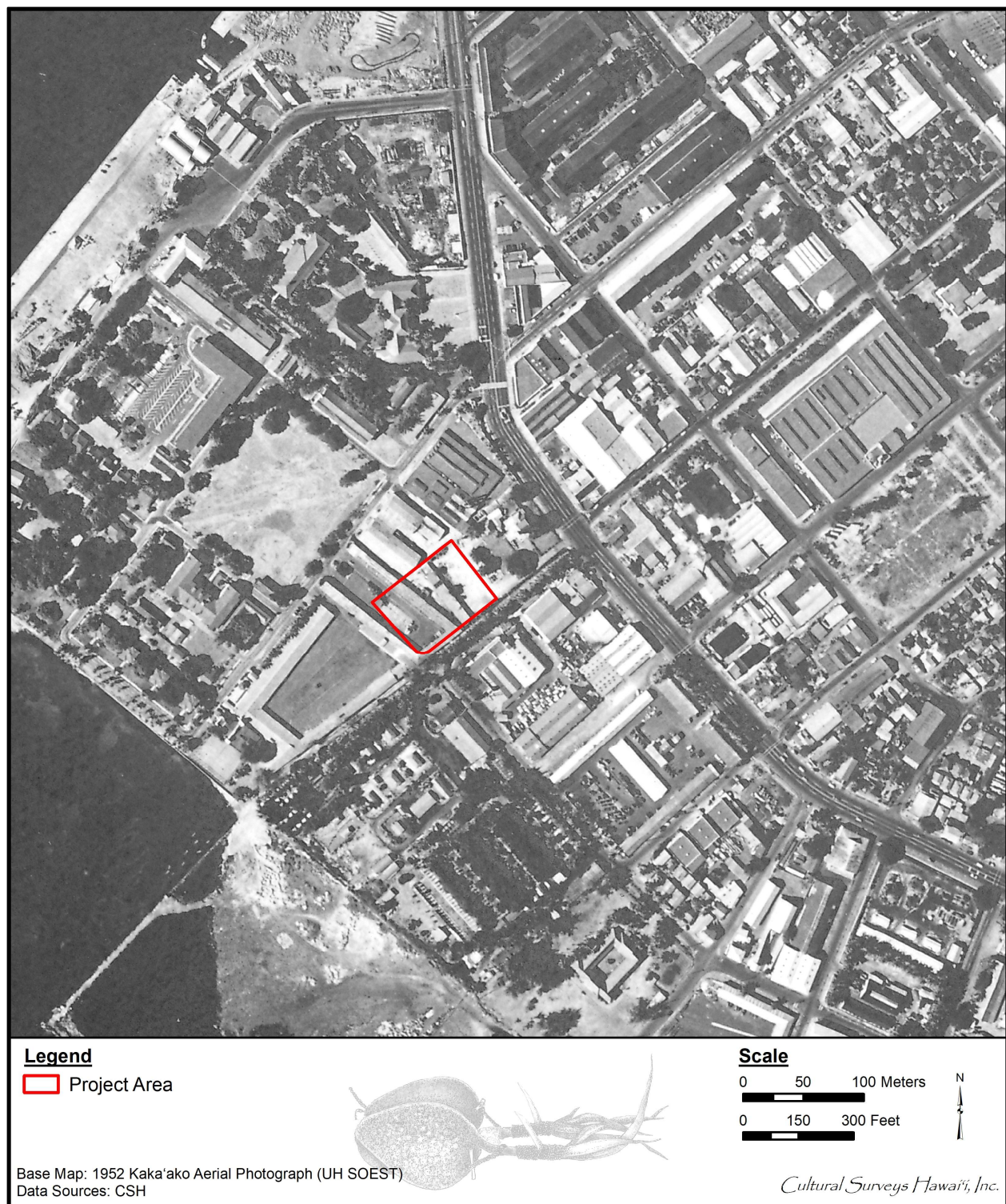


Figure 28. 1952 Kakaako aerial photograph (UH SOEST) showing the location of the Ala Moana No. 1 WPS Improvements project area just before construction of the (1954) Ala Moana #1 building in the northeast/central portion of the project area,

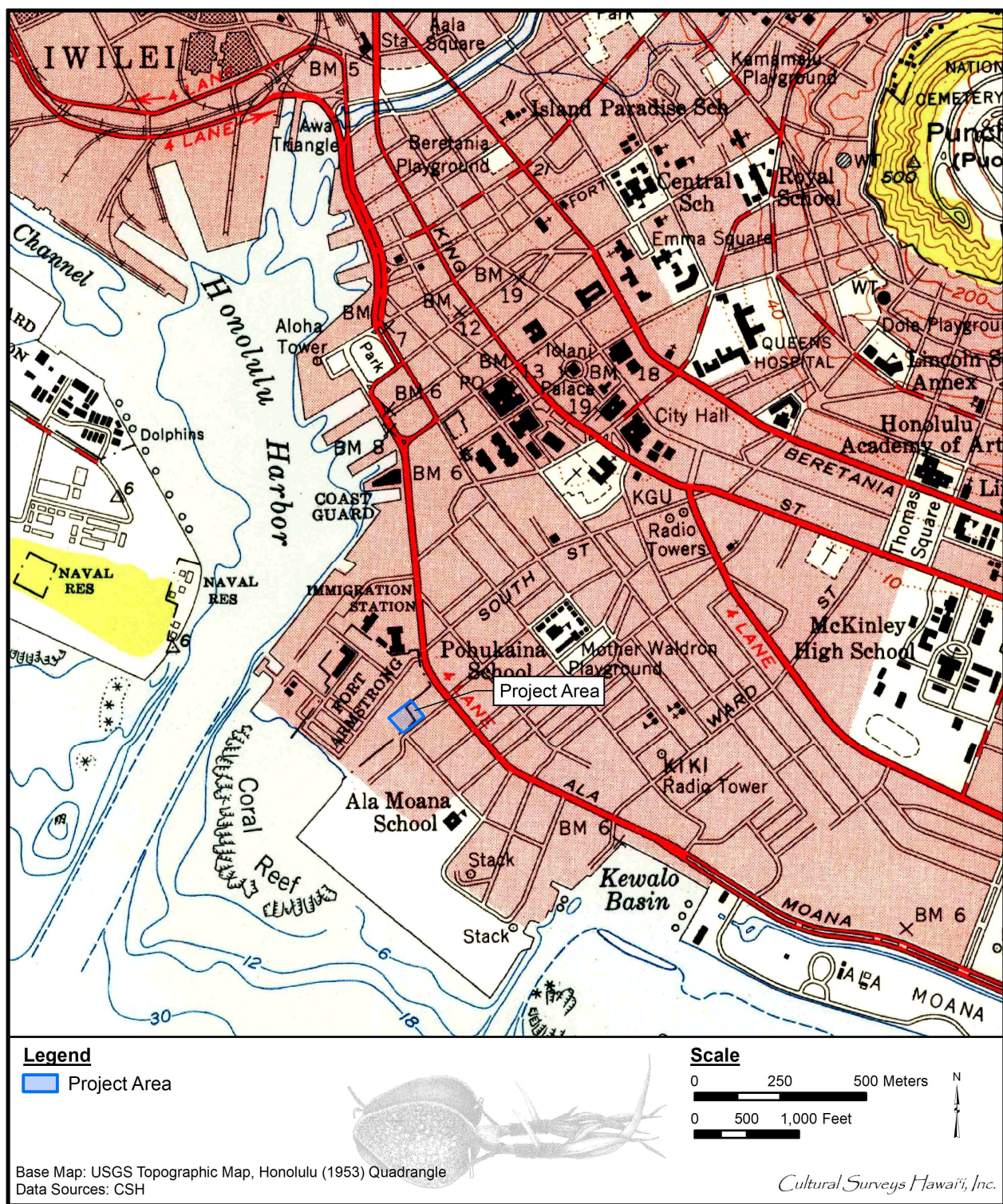


Figure 29. Portion of 1953 Honolulu USGS topographic quadrangle showing the location of the Ala Moana No. 1 WPS Improvements project area



Figure 30. 1954 Kakaako aerial photograph (UH SOEST) showing the location of the Ala Moana No. 1 WPS Improvements project area which appears to show the brand new (1954) Ala Moana #1 building (rectangular northwest/southeast-oriented building in the northeast/central portion of the project area, still extant today)

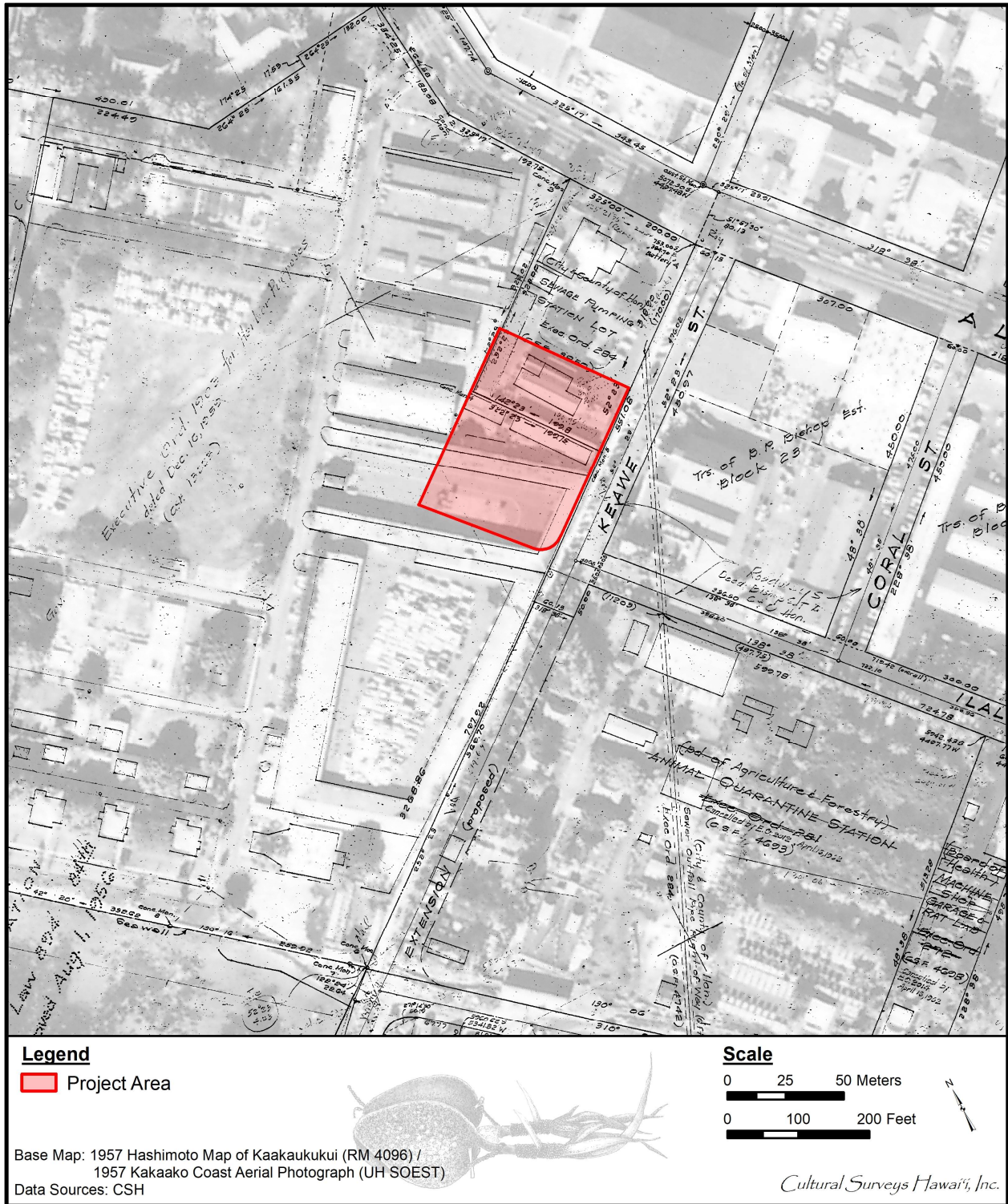


Figure 31. 1957 Hashimoto map of Kaakaukukui with a 1957 Kakaako coast aerial photograph (UH SOEST) showing the location of the Ala Moana No. 1 WPS Improvements project area

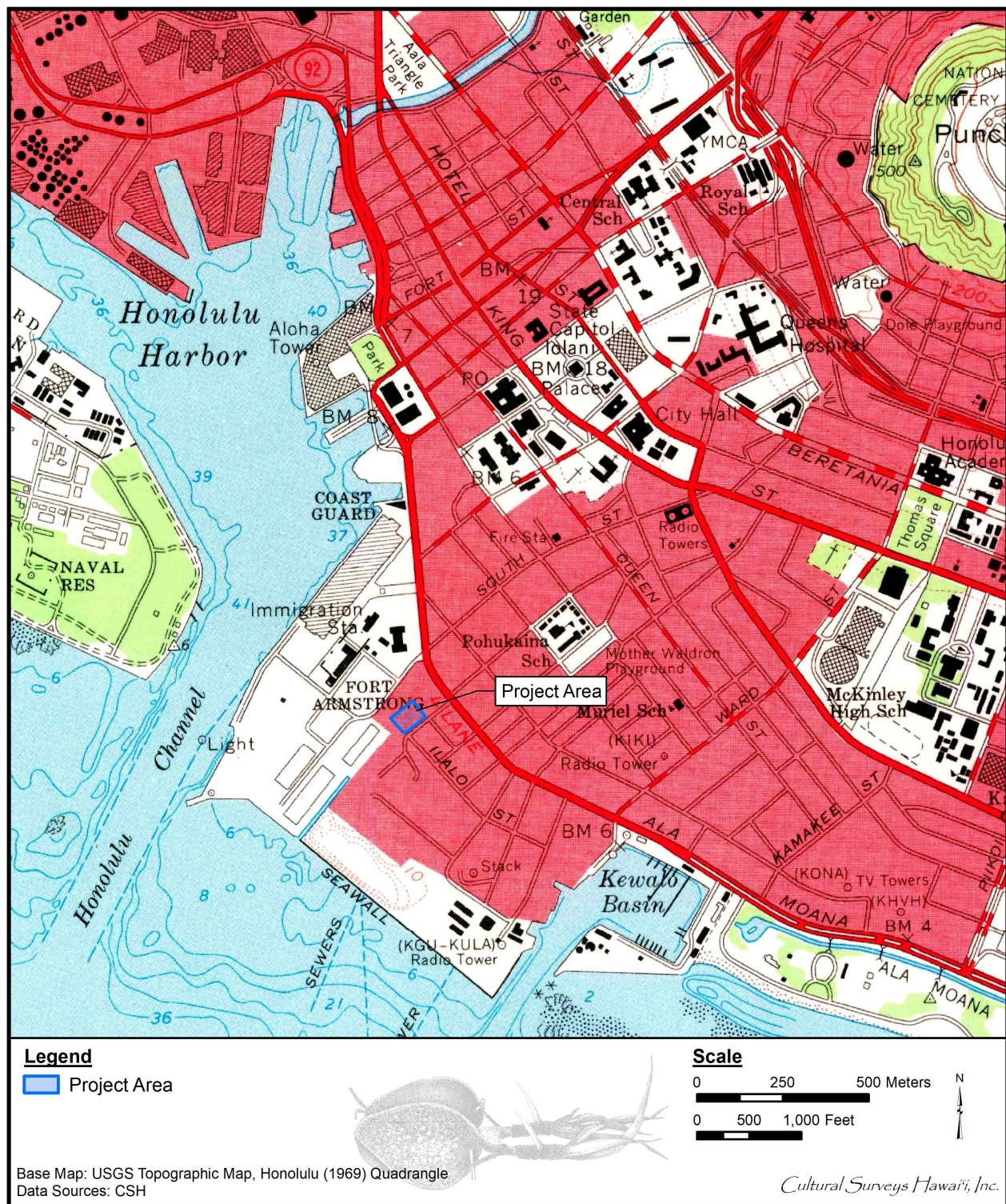


Figure 32. Portion of 1969 Honolulu USGS topographic quadrangle showing the location of the Ala Moana No. 1 WPS Improvements project area

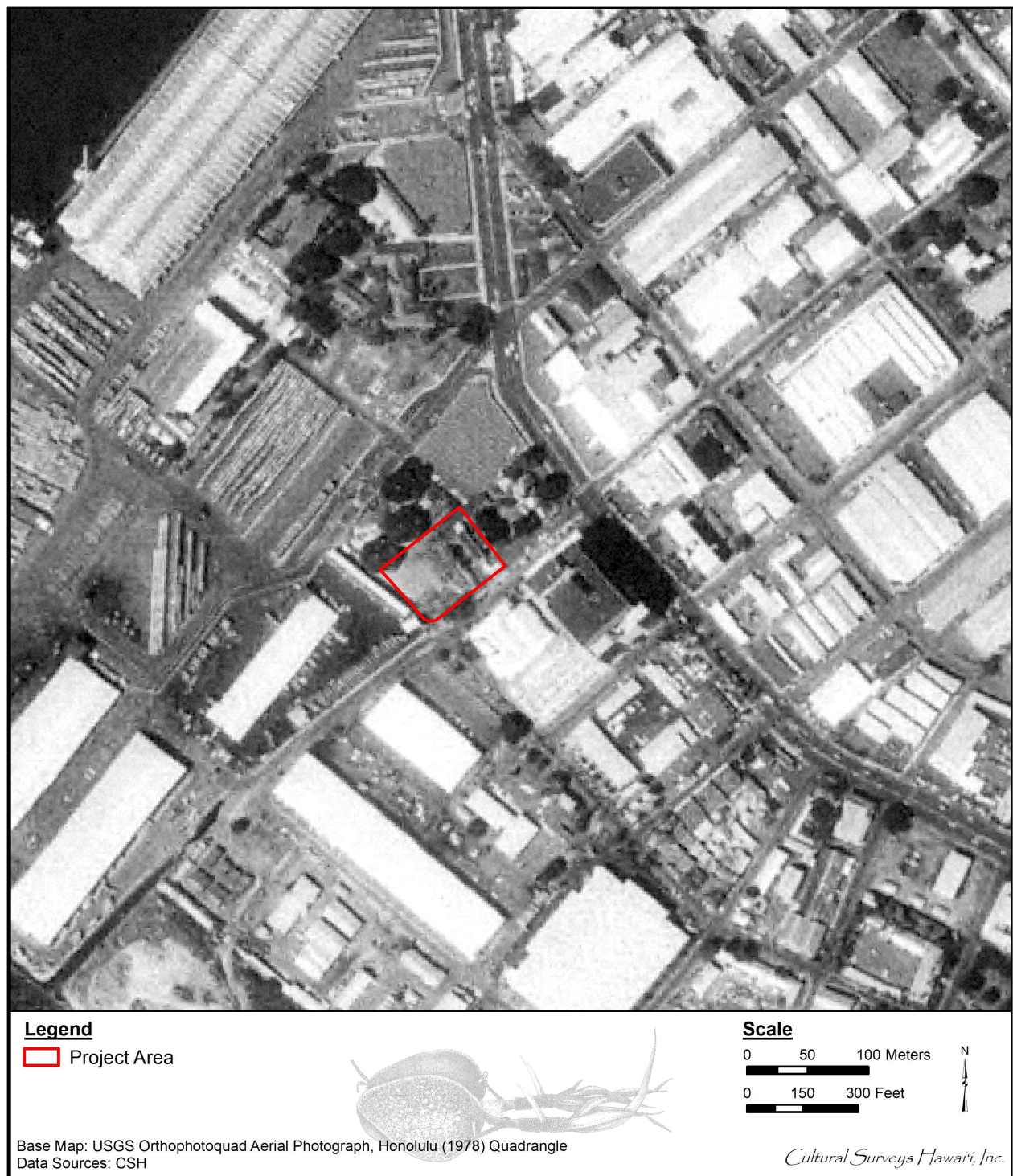


Figure 33. Portion of the 1978 USGS Orthophotoquad aerial photograph, Honolulu quadrangle showing the location of the Ala Moana No. 1 WPS Improvements project area showing the (1954) Ala Moana #1 building (rectangular northwest/southeast-oriented building in the northeast/central portion of the project area, still extant today) but not the southwestern Ala Moana #2 building which would not be built until 1983



Figure 34. Portion of a 1982 Kaka'ako aerial photograph (UH SOEST) showing the location of the Ala Moana No. 1 WPS Improvements project area with the (1954) Ala Moana #1 building (rectangular northwest/southeast-oriented building in the northeast/central portion of the project area, still extant today) but not today's southwestern Ala Moana #2 building which would not be built until 1983

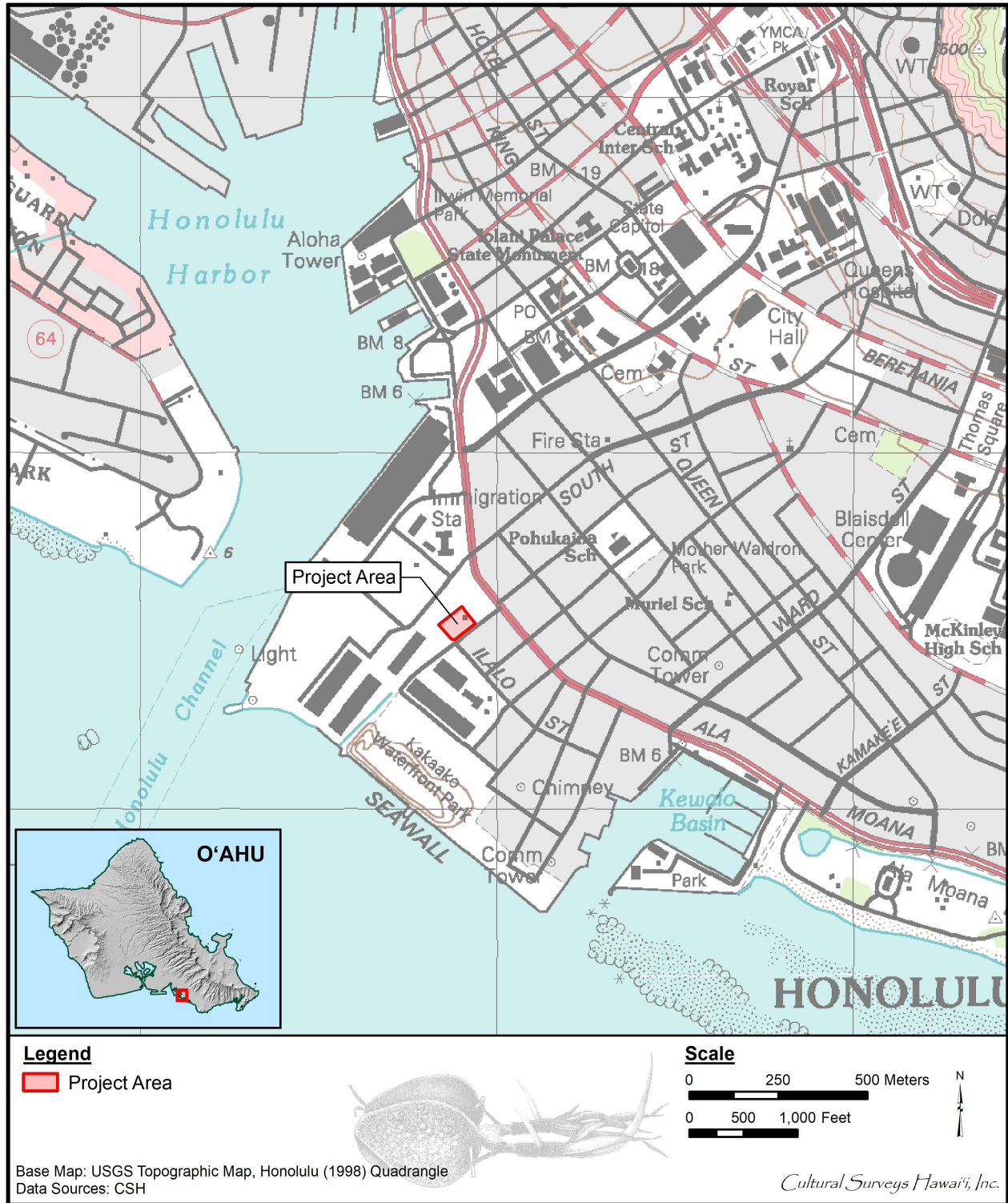


Figure 35. Portion of the 1998 Honolulu USGS 7.5-minute topographic quadrangle showing the location of the Ala Moana No. 1 WPS Improvements project area



Figure 36. Portion of 2005 Kakaako aerial photograph (UH SOEST) showing the location of the Ala Moana No. 1 WPS Improvements project area much as it is today

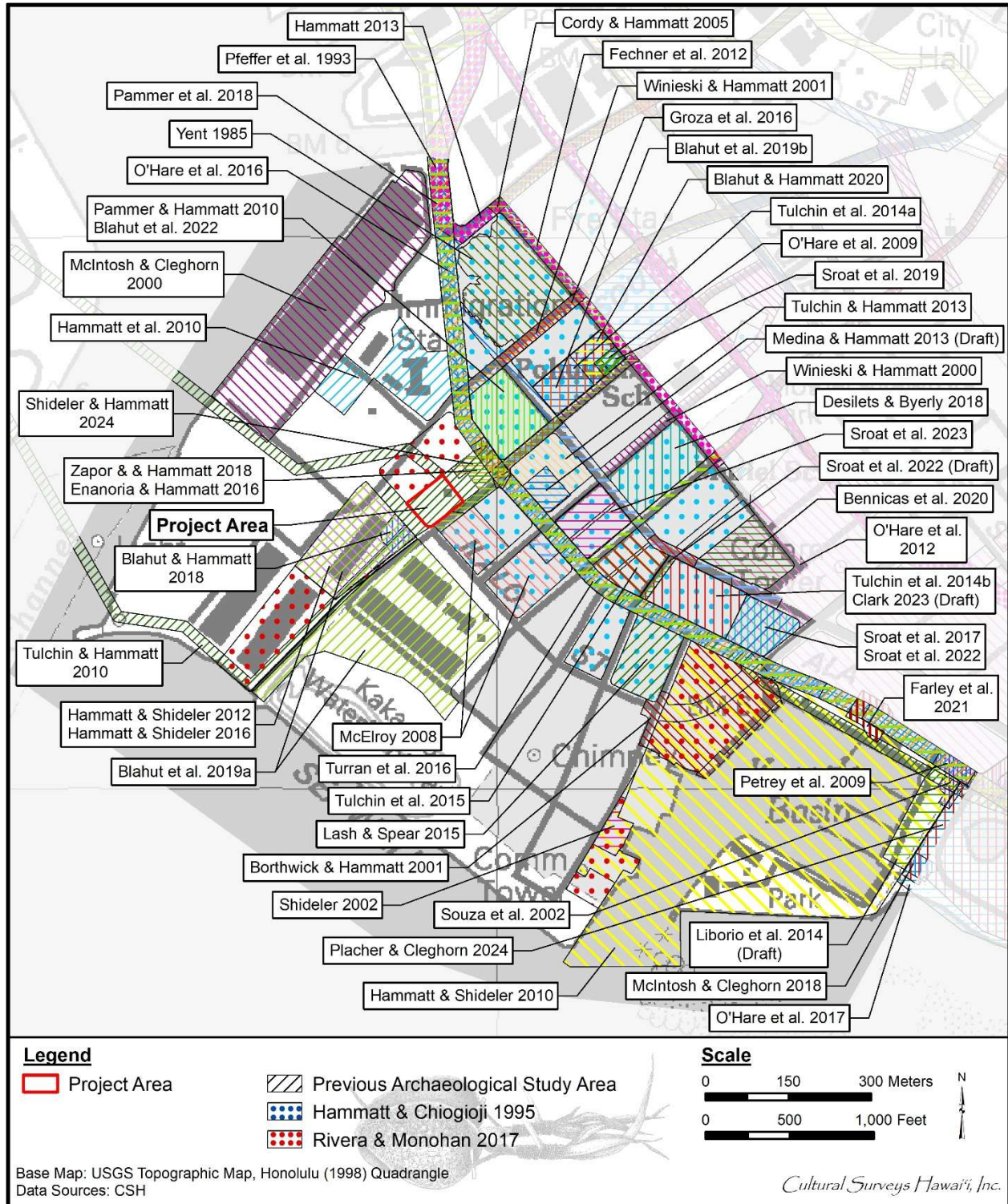


Figure 37. Previous archaeological studies in the vicinity of the Ala Moana No. 1 WPS Improvements project area on a portion of a 1998 Honolulu USGS topographic quadrangle base map

Table 1. Previous archaeological studies in the vicinity of the Ala Moana No. 1 WPS Improvements project area

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Yent 1985	Burial excavations	Honolulu Ironworks construction site	Ka'ākaukui Cemetery (SIHP # -02918) at Honolulu Ironworks project area; six burials (SIHP # -02918) mentioned
Pfeffer et al. 1993	Archaeological monitoring	Kaka'ako Improvement District 1	Monitoring for Kaka'ako ID-1; 31 burials from 1853-1854 Honuakaha Smallpox Cemetery (SIHP # -03712) at Quinn Lane, one historic burial from Punchbowl St (SIHP # -04532), one possibly pre-Contact burial from Halekauwila St (SIHP # -04533), and 116 historic burials from Kawaiaha'o Cemetery (SIHP # -04534) at Queen St (used from 1825–1920)
Hammatt and Chiogioji 1995	Archaeological literature review and field inspection	Twenty parcels (54 acres) in Kaka'ako bounded by Ward Ave, Punchbowl St, Queen St, and Ilalo St	Concluded none of structures currently extant on blocks pre-dates 1950 and summarizes data on locations of fishponds, burial sites, leprosy hospital, and former locations of ethnic “camps”
McIntosh and Cleghorn 2000	Archaeological study for Oahu Commercial Harbors 2020 Master Plan-Immediate Phase EIS	Five discrete areas in SE Honolulu Harbor including western Fort Armstrong (Pier 2)	Overview of cultural history and previous archaeology; discusses mitigation for demolition of Pier 2 shed (built in 1953)
Winieski and Hammatt 2000	Archaeological monitoring	Kakaako Improvement District 3 Pohulani Elderly Rental Housing and Kauhale Kakaako	Twenty human burials discovered during projects, nine at Pohulani Elderly Rental Housing project (SIHP # -04380) and 11 in and around Mother Waldron Park (SIHP # -05820); 17 burials recovered and reinterred in Mother Waldron Park; three left in place beneath Pohulani Elderly Rental Housing facility
Borthwick and Hammatt 2001	Archaeological monitoring	Kaka'ako Improvement District 6	No archaeological historic properties identified; based on background data and monitoring results, specific project area seaward of shoreline and cut and infilled in early to mid-1900s

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Winieski and Hammatt 2001	Archaeological monitoring	Nimitz Hwy reconstructed sewer	Identified historic brick alignment at intersection of Queen St; historic brick-lined manhole and remnant of light gauge trolley rail (SIHP # -05942) observed at intersection of Queen St and Nimitz Hwy; no other cultural features or materials encountered within project area
Shideler 2002	HABS documentation	121 'Āhui St	Incinerator Number One (Old Kewalo Incinerator) built in 1930; concluded Incinerator Number One achieves state and local significance in areas of maritime and social history, as well as engineering and architecture
Souza et al. 2002	Archaeological monitoring	Kakaako Improvement District 7	Three human burials encountered, two within backdirt piles; SIHP # -06376 sourced to <i>mauka</i> side of Ala Moana Blvd near Kamake'e St; SIHP # -06377 within undisturbed beach sand deposit located 9 m <i>mauka</i> (NE) of Auahi St and 2 m Diamond Head (SE) from 'Ewa (NW) sidewalk of Kamake'e St
Cordy and Hammatt 2005	Archaeological monitoring	Punchbowl St Improvements, Phase 2	No historic properties identified
McElroy 2008	Archaeological assessment (no finds AIS)	3.10-acre property bounded by Coral St, Ilalo St, Cooke St, and Ala Moana Blvd	No historic properties identified; test excavations showed study area consisted of former reef flats filled in during early 1900s
O'Hare et al. 2009	Archaeological inventory survey plan	Halekauwila St to Auahi St and South St to Keawe St	Preliminary subsurface testing (13 trenches) indicated presence of thick fill deposits overlying naturally deposited marine clay
Petrey et al. 2009	Archaeological monitoring	Nimitz Hwy and Ala Moana Blvd resurfacing	No historic properties identified; project excavations generally to depths of 0.6 m or less below existing surface
Hammatt et al. 2010	Archaeological literature review and field inspection	U.S. Immigration and Customs Enforcement (ICE) Master Plan	Concluded study area 20th century fill atop tidal flats, except for late 19th century seawall potentially abutting northeast edge of project lands

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Hammatt and Shideler 2010	Archaeological literature review and field inspection	Kewalo Basin repairs	At least 95% of study area 20th century fill; potential cultural deposit-bearing soils within 10 m seaward of seaward curb of Ala Moana Blvd
Pammer and Hammatt 2010	Archaeological assessment (no finds AIS)	Former Comp USA parcel, Kaka'ako	No historic properties identified; project area underwent extensive land modification during filling of low-lying areas of Kaka'ako
Tulchin and Hammatt 2010	Archaeological literature review and sensitivity zone maps	Sand Island Waste Water Treatment Plant & Sewer Basin Facilities, Kalihi, Kapālama, Honolulu and Waikīkī Ahupua'a	Assessed Kaka'ako Makai portion of area as "Low" archaeological sensitivity
Fechner et al. 2012	Archaeological inventory survey	Honolulu Seawater Air Conditioning project, Honolulu and Kaka'ako	No historic properties recorded
Hammatt and Shideler 2012	Archaeological literature review and field inspection	Phase III project for UH JABSOM campus	Noted no in situ subsurface cultural resources pre-dating ca. 1911 would be expected but "SHPD has been inclined to ask for archaeological monitoring programs for developments in such areas citing the possibility of early twentieth century subsurface cultural resources."
O'Hare et al. 2012	Archaeological literature review and field inspection	Ward Neighborhood Master Plan, Kaka'ako	Recommended archaeological inventory surveys for any portions of study area slated for ground-disturbing activities, because of potential for undiscovered burials, amount of Land Commission Awards, and historic properties associated with early development of Honolulu

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Hammatt 2013	Archaeological inventory survey	City Center (Section 4) of Honolulu High-Capacity Transit Corridor	Identified three archaeological historic properties near present project area: • SIHP # -02918, subsurface cultural deposit and human burials • SIHP # -07189, subsurface burnt trash deposit • SIHP # -07190, subsurface salt pan remnants
Medina and Hammatt 2013	Archaeological monitoring	680 Ala Moana Blvd redevelopment	Discusses buried structural remnants (i.e., concrete slabs) and historic trash layers associated with SIHP # -07413
Tulchin and Hammatt 2013	Archaeological inventory survey	Kamehameha Schools Kaka'ako Block F	Two archaeological historic properties identified: • SIHP # -07412, post-Contact cultural layer associated with construction and utilization of Kaka'ako Leper Detention Depot • SIHP # -07413, post-Contact trash layers and structural remnants associated with construction and utilization of Hawaiian Sugar Planters Association Immigration Station
Liborio et al. 2014	Archaeological literature review and field inspection	Kewalo Basin retail project	No historic properties identified
Tulchin et al. 2014a	Archaeological inventory survey	Kamehameha Schools Kaka'ako Block B	Two archaeological historic properties identified: • SIHP # -07512, post-Contact structural remnants associated with early to mid-20th century development • SIHP # -07513, post-Contact trash layer associated with early 20th century land reclamation

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Tulchin et al. 2014b	Archaeological inventory survey	Kamehameha Schools Kaka'ako Block I	Six archaeological historic properties identified: • SIHP # -07578, 20th century cultural layer • SIHP # -07579, 20th century fill deposit and building foundations • SIHP # -07580, pre-Contact to post-Contact cultural layer with historic burial cluster • SIHP # -07581, pre-Contact traditional Hawaiian bundle burial • SIHP # -07582, disarticulated human skeletal remains within non-burial context • SIHP # -07583, disarticulated human skeletal remains within non-burial context
Lash and Spear 2015	Archaeological inventory survey	3.02-acre Cutter Mazda Property at 805 Ala Moana Blvd	Two historic properties identified: SIHP # -07788, comprised of 14 features, newly documented and understood as associated with expansion of Kaka'ako and use of property by City & County of Honolulu in 1920s and 1930s to support Building Inspector Department operations and construction of Kewalo Basin; SIHP # -07789 interpreted as associated with infill of Kaka'ako tidelands and early expansion of district <i>makai</i> of Ala Moana Blvd
Tulchin et al. 2015	Archaeological inventory survey	Kamehameha Schools Kaka'ako Block H	One archaeological historic property identified: • SIHP # -07549, post-Contact structural remnants associated with early to mid-20th century development
Enanoria and Hammatt 2016	Archaeological inventory survey	Kaka'ako Pumping Station	One archaeological historic property identified: • SIHP # -09710, architectural site known as Kaka'ako Pumping Station
Groza et al. 2016	Archaeological literature review and field inspection	Along portions of Halekauwila, Cooke, and Auahi streets	On-call archeological monitoring recommended for portions of study area closest to current project area

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Hammatt and Shideler 2016	Archaeological literature review and field inspection	Entrepreneur's Sandbox <i>makai</i> of Ala Moana Blvd/ Nimitz Hwy alignment	Project area was coral flats until being filled in early 20th century; no surface historic properties identified; very little subsurface archaeology expected
O'Hare et al. 2016	Archaeological literature review and field inspection	BWS Honolulu WSI, primarily from River St and Nimitz Hwy, along Nimitz Hwy and Ala Moana Blvd, to intersection with Kalākaua Ave	Nimitz Hwy near present project area evaluated as "Medium" sensitivity as former marsh and salt pan area
Turran et al. 2016	Archaeological monitoring	Portions of Auahi St, Keawe St, and Ala Moana Blvd	No historic properties identified
O'Hare et al. 2017	Archaeological literature review and field inspection	Ala Moana Regional Park Master Plan	Raised concerns for northern section of park immediately adjacent to Ala Moana Blvd and for possible finds in imported sand; noted possible subsurface remnants of Anti-Motor-Torpedo Boat (AMTB) Battery at Ala Moana Regional Park and related army temporary shacks for housing and bomb shelters built in 1944 and destroyed in 1946 may be present in a specific area; possibly subsurface remnants of Ulu Mau Village (recreation of Hawaiian village) dating from 1948 into early 1960s may be present and several original, unmodified structures/features in park are older than 50 years
Rivera and Monahan 2017	Archaeological monitoring	Kaka'ako Makai soil sampling at Parcels A, C, D, E, I, and L	No historic properties identified in examinations of 420 2-inch diameter soil cores
Sroat et al. 2017	Archaeological inventory survey	Ward Block A	Documented three previously identified historic properties in 39 test excavations: SIHP # -07579, buried 20th century infrastructure remnants; SIHP # -07580, subsurface cultural deposits; and SIHP # -07655, historical salt pan remnants

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Blahut and Hammatt 2018	Archaeological inventory survey	Entrepreneur's Sandbox <i>makai</i> of Ala Moana Blvd/ Nimitz Hwy alignment	Single historic property identified, SIHP # -08049 consists of buried structural remnants and cultural deposits associated with Fort Armstrong, military fort present within project area in first half of 20th century
Desilets and Byerly 2018	Archaeological inventory survey	Kamehameha Schools Kaka'ako Block C	Excavation of 38 backhoe test trenches identified six subsurface features (bottles, brick fragments, ceramic sherds, cut cow bone) dating to early to mid-20th century regarded as components of SIHP # -07578 recorded by Tulchin et al. (2014)
McIntosh and Cleghorn 2018	Archaeological monitoring	Ala Moana Sand Volleyball Courts, Ala Moana Regional Park	No intact native soils uncovered; likewise, no artifacts or cultural resources identified during excavations
Pammer et al. 2018	Archaeological monitoring	Nimitz Hwy and Ala Moana Blvd (resurfacing and highway lighting replacement)	Four archaeological historic properties identified: SIHP # -04573, subsurface remnants of pond sediment (Loko Kaipuni), SIHP # -07435, human skeletal remains (Features A–D), SIHP # -07436, human skeletal remains, SIHP # -08037, buried historic surfaces
Zapor and Hammatt 2018	Archaeological monitoring	Kaka'ako Pumping Station	One newly identified feature of SIHP # -09710 (Feature 1) identified consisting of stacked brick and mortar wet-well with concrete cap and cast-iron pipes leading from Kaka'ako Pumping Station
Blahut et al. 2019a	Archaeological literature review and field inspection	Kakaako Transpacific Broadband cable conduit project bounded <i>mauka</i> by Ilalo St; includes Lot C, UH JABSOM campus, and portion of Kaka'ako Waterfront Park	No surface archaeological historic properties identified; discusses SIHP # -08049, buried structural remnants and cultural deposits associated with Fort Armstrong

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Blahut et al. 2019b	Archaeological monitoring	400 Keawe St Block B-1 residential and commercial development	Two previously identified archaeological historic properties observed during monitoring: • SIHP # -07512, post-Contact structural remnants associated with early to mid-20th century development • SIHP # -07513, post-Contact trash layer associated with early 20th century land reclamation
Sroat et al. 2019	Archaeological inventory survey	Alu Like building renovation, Kaka‘ako	Three historic properties identified: • SIHP # -07190, buried salt pan remnants, previously documented by Pammer et al. (2011), Hammatt (2013), and Blahut and Hammatt (2018) within adjacent project areas • SIHP # -07512, post-Contact structural remnants associated with early to mid-20th century development, previously identified by Tulchin et al. (2014) and Blahut and Hammatt (2017 and 2018) within adjacent project area • SIHP # -07513, post-Contact trash layer associated with early 20th century land reclamation; also previously identified by Tulchin et al. (2014) and Blahut and Hammatt (2017 and 2018) within adjacent project area
Bennicas et al. 2020	Archaeological monitoring	Ward Block F	Three newly identified historic properties documented: SIHP # -08790, early to mid-20th century buried surfaces, and SIHP # -08791, historical salt pan remnants

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Blahut and Hammatt 2020	Archaeological monitoring	440 Keawe St Block B-2 residential development project	Three previously identified historic properties and one newly identified: • SIHP # -07190, buried salt pan remnants and associated berms • SIHP # -07512, post-Contact structural remnants associated with early to mid-20th century development • SIHP # -07513, post-Contact trash layer associated with early 20th century land reclamation, and one newly identified historic property: • SIHP # -07924, an isolated human skeletal fragment
Farley et al. 2021	Archaeological inventory survey	Ala Moana Blvd Elevated Pedestrian Walkway	Additional component of previously identified SIHP # -07658 (two adjacent fill deposits, interpreted as former surface of Ala Moana Blvd) and new historic property designated as SIHP # -08925 (subsurface cultural layer) documented
Blahut et al. 2022	Archaeological monitoring	The Collection condominium and townhouses, Kaka'ako	One newly identified archaeological historic property documented, SIHP # -08197, buried structural remnants associated with early to mid-20th century industrial development
Sroat et al. 2022	Archaeological monitoring	Block A (Ward Plaza demolition)	No additional components or features associated with three previously identified historic properties (SIHP #s -07579, -07580, and -07655) within project area documented

Reference	Type of Study	Location	Results (SIHP # 50-80-14****)
Clark 2023	Archaeological data recovery (end-of-fieldwork letter)	SIHP # -07580 for Ālia at 888 Ala Moana project	Six archaeological historic properties newly identified during AIS: • SIHP # -07578, subsurface cultural deposit comprising cultural layer reflective of 20th century habitation • SIHP # -07579, subsurface cultural deposit comprising 20th century fill deposit and associated building foundations • SIHP # -07580, subsurface cultural deposit comprising cultural layer reflective of pre- to post-Contact habitation with associated human burial cluster • SIHP # -07581, pre-Contact traditional Hawaiian burial bundle • SIHP # -07582, disarticulated human skeletal remains within non-burial context • SIHP # -07583, disarticulated human skeletal remains within non-burial context
Sroat et al. 2023	Archaeological inventory survey	Kamehameha Schools' Kaiaulu O Kakaako Block G redevelopment	Documents SIHP #s -07412, subsurface cultural deposits (1881-1913); -07549, subsurface cultural deposits and infrastructure remnants (1914-1956); -09133 subsurface salt pan remnants (ca. 1855 to 1902); -09173, subsurface fill (1913-1914); and -09179 subsurface cultural deposits (1902-1913)
Placher and Cleghorn 2024	Archaeological monitoring	Ala Moana Regional Park (irrigation improvements)	No historic properties identified (other than Ala Moana Regional Park as part of Honolulu's Art Deco Parks Thematic Group, SIHP # -01388)
Shideler and Hammatt 2024	Archaeological literature review and field inspection	Sewer Relief and Rehabilitation – Ala Moana Basin project, including Ala Moana Blvd and Keawe St	Concludes exceedingly likely fill deposits similar to neighboring SIHP # -07513 might be expected in Keawe St at Ala Moana Blvd project area, but notes these relatively well documented in other studies

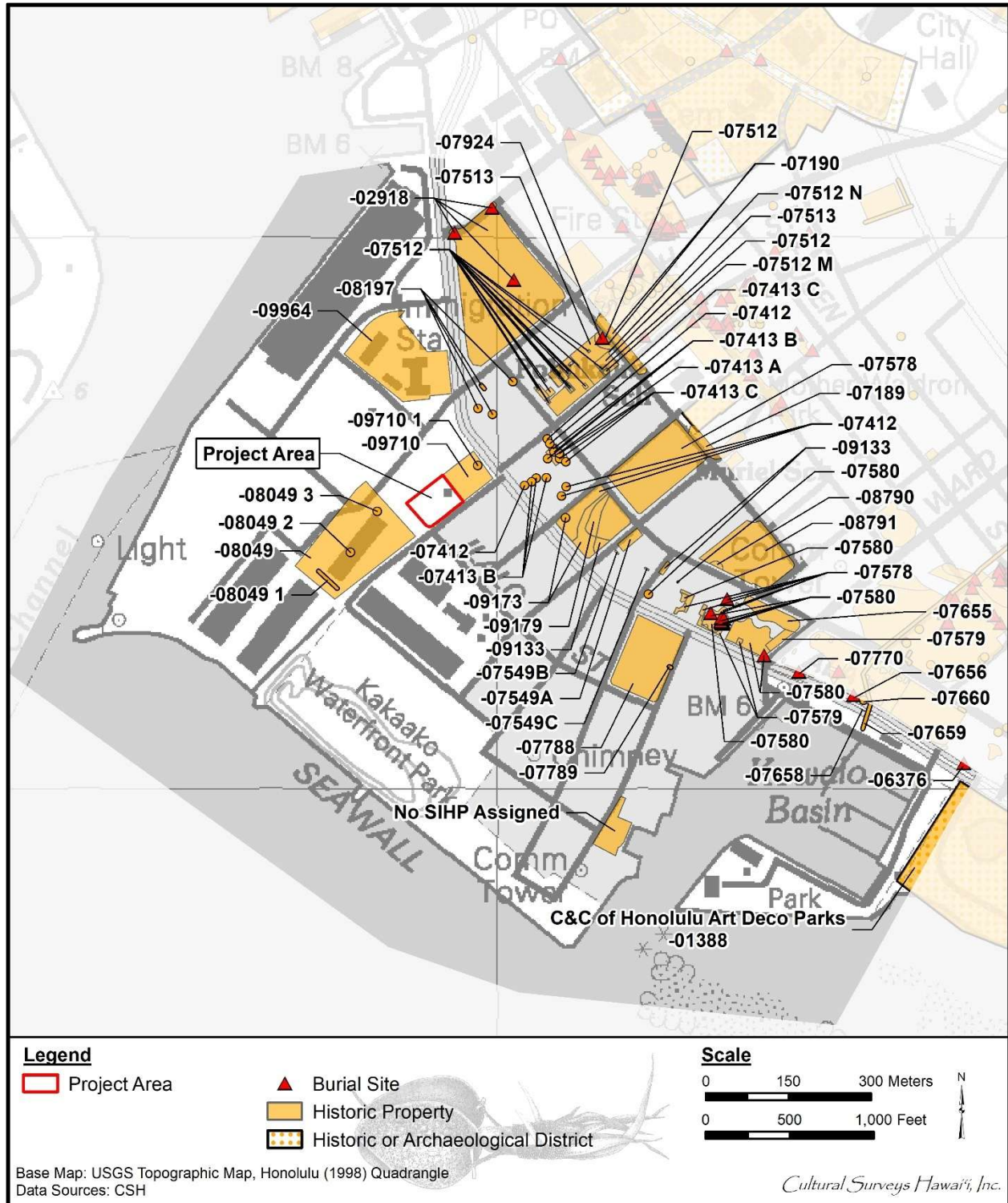


Figure 38. Previously identified historic properties in the vicinity of the Ala Moana No. 1 WPS Improvements project area on a portion of a 1998 Honolulu USGS topographic quadrangle base map

Table 2. Previously identified historic properties in the vicinity of the Ala Moana No. 1 WPS Improvements project area

SIHP # (50-80-14)	Site Type	Comment	Source
-01388	City and County of Honolulu Art Deco Parks	Art Deco Parks Thematic: Ala Moana Beach Park (Architect: Harry Sims Bent 1934)	NRHP Registration Form (Hibbard 1988), added to HRHP 9 June 1988
-02918	Burials and a subsurface cultural deposit	Yent (1985) described 6 burials from Honolulu Ironworks construction site, Hammatt (2013) included 29 pits (including 1 human burial pit, 1 dog burial pit, 4 postmolds, 1 trash pit, and 22 indeterminate) and 1 human skeletal remains	Yent 1985, Hammatt 2013
-06376	Burial (human)	(Burial #1) was inadvertently discovered by Delta Construction personnel on October 13, 2000 in the Kamake'e Street base yard backdirt pile. The burial consisted of a single cranial vault. The backdirt pile derived from a trench for an electric box on Ala Moana Boulevard and Kamake'e Street.	Souza et al. 2002
-07189	Historic burnt garbage deposits	"a layer of burnt historic debris, used to fill the unwanted wetlands of Kewalo, Kaka'ako, and Waikīkī"; the glass bottles dated up to 1920 while the ceramic assemblage largely consisted of British and Asian exported items dated to the late 1800s to early 1900s	Pammer et al. 2011, Hammatt 2013
-07190	Salt pan remnants	Early historic salt pan remnants (including possible berms)	Pammer et al. 2011, Hammatt 2013
-07412	Subsurface cultural layer	Post-Contact cultural layer associated with the construction and utilization of the Kaka'ako Leper Detention Depot	Tulchin and Hammatt 2013; Sroat et al. 2023
-07413 A	Historic building	Feature A consists of a reinforced concrete building known as the Hawaiian Sugar Planters Immigration Station.	Tulchin and Hammatt 2013
-07413 B	Subsurface building foundation	Eight buried concrete slabs (i.e., structural remnants) understood to post-date 1913 and to be associated with early 20th century development	Tulchin and Hammatt 2013

SIHP # (50-80-14)	Site Type	Comment	Source
-07413 C	Subsurface trash layer	Trash layers that contained burnt and pulverized glass, metal, and ceramic fragments, and cut faunal bone understood to pre-date 1913	Tulchin and Hammatt 2013
-07512	Historic building remnants	Structural remnants associated with early to mid-twentieth century development (Tulchin et al. 2014a discuss 7 features, A through G)	Tulchin et al. 2014a
-07512 M	Crushed coral surface	Indurated crushed coral surface associated with Honolulu Iron Works (1927)	Sroat et al. 2019
-07512 N	Crushed coral surface	Indurated coral surface associated with Honolulu Iron Works or warehouse (1927, 1950)	Sroat et al. 2019
-07513	Subsurface trash deposit	Trash layer associated with early twentieth century land reclamation	Tulchin et al. 2014a
-07549 A	Subsurface building remnant	Discontinuous large buried concrete slab associated with the Hawaiian Tuna Packers, LTD fish cannery operations	Tulchin et al. 2015; Sroat et al. 2023
-07549 B	Historic building remnants	Consists of two sub-features: a buried concrete slab (Sub-feature 1) and a buried wall, column footing and concrete slab (Sub-feature 2) beneath Sub-feature 1 understood as constructed by 1950 and as associated with a large warehouse complex	Tulchin et al. 2015; Sroat et al. 2023
-07549 C	Buried asphalt surface	A buried asphalt surface understood as constructed by 1950	Tulchin et al. 2015
-07578	Subsurface cultural deposit	Twentieth century cultural layer	Tulchin et al. 2014b, Desilets and Byerly 2018
-07579	Subsurface infrastructure remnants	Twentieth century fill deposit and building foundations	Tulchin et al. 2014b, Sroat et al. 2017
-07580	Subsurface cultural deposit	Pre-Contact to post-Contact cultural layer with a historic burial cluster (8 burial finds) for 129 designated features	Tulchin et al. 2014b, Sroat et al. 2017
-07655	Salt pans	Documented as an extensive, grid-like system of interconnected, man-made salt pan berms enclosing low-lying, level salt pan beds	Pammer et al. 2014; Sroat et al. 2014; Sroat et al. 2017

SIHP # (50-80-14)	Site Type	Comment	Source
-07656	Burial (human)	A previously identified, isolated human cranial fragment	Pammer et al. 2014
-07658	Buried historic surfaces	Buried historic surfaces, including asphalt, concrete, coral and tar pavement, oil-rolled surfaces, and fencelines	Pammer et al. 2014
-07659	'Auwai (ditch)	Concretized Ward Estate 'auwai (ditch)	Pammer et al. 2014
-07660	Trash fill deposit	A historic trash fill deposit (mid-twentieth century), utilized to fill in an abandoned drain line box	Pammer et al. 2014
-07770	Subsurface cultural deposits with associated features and a human burial site	Consists of two subsurface deposits; included traditional-type Hawaiian cultural material (e.g., marine shell midden, fire-affected rock, and a basalt fishing sinker stone) and historical artifacts (window glass fragment); Feature 5 consisted of a concentration of disarticulated and fragmented human skeletal remains as well as several scattered human skeletal elements	Sroat et al. 2017
-07788	Grouping of buildings	Associated with the twentieth century Historic Period expansion of Kaka'ako and the use of the property by the City & County of Honolulu in the 1920s and 1930s to support Building Inspector Department operations and the construction of Kewalo Basin (14 features including former buildings and concrete pads)	Lash and Spear 2015
-07789	Former seawall	A subsurface (buried) former seawall	Lash and Spear 2015
-07924	Burial (human)	A single inadvertent human skeletal fragment from within the previously identified subsurface trash layer designated SIHP # -07513, utilized for land reclamation within the Kaka'ako area	Blahut and Hammatt 2020
-08049	Subsurface structural remnants	Military installation, associated with the historic Fort Armstrong (located within the vicinity of the project area beginning in 1909 and extending into the 1950s)	Blahut and Hammatt 2018
-08049 1	Former seawall	Mortared basalt boulder and coral cobble wall used as a seawall	Blahut and Hammatt 2018

SIHP # (50-80-14)	Site Type	Comment	Source
-08049 2	Polished concrete floor	Appears consistent with a floor utilized in a workshop or garage and corresponds to a building labeled “garage” on a 1921 map of Fort Armstrong	Blahut and Hammatt 2018
-08049 3	Former constructed surface of Fort Armstrong	A former surface comprised of a layer of compacted crushed coral gravel (Stratum IVa) atop an oil-rolled surface or possible macadam surface (Stratum IVb); short-lived surface associated with early Fort Armstrong	Blahut and Hammatt 2018
-08197	Buried structural remnants	Features 1–4 are remnants consisting of concrete slabs and walls that correlate to structures built by 1906 for the Union Feed Company	Blahut et al. 2022
-08790	Buried constructed surfaces	Historical buried surfaces associated with early to mid-twentieth century industrial/commercial development. Components identified include prepared coral surfaces (e.g., coral slabs, cemented coral aggregate surfaces, compacted crushed coral surfaces, oil-rolled crushed coral surfaces) and A horizons that developed atop crushed coral early twentieth century reclamation fill.	Bennicas et al. 2020
-08791	Subsurface historical salt pan remnants	Part of the extensive salt works of Kaka‘ako during the nineteenth century to approximately the early twentieth century represent an import aspect of the Honolulu Harbor victualling trade as well as domestic supply of this vital commodity	Bennicas et al. 2020
-09133	Subsurface historical salt pan remnants	These subsurface salt works remnants are likely associated with the historic Kaka‘ako Salt Works which operated in this area from ca. 1855 to 1902.	Sroat et al. 2023
-09173	Fill deposit	It consists of dredged marine sediments utilized to infill the natural low-lying coastal wetlands of Ka‘ākaukui and Kukuluāe‘o (modern-day Kaka‘ako) during the large-scale Kewalo Reclamation Project of 1913–1914.	Sroat et al. 2023

SIHP # (50-80-14)	Site Type	Comment	Source
-09179	Subsurface cultural deposits	Subsurface cultural deposits and features associated with 1902–1913 land use	Sroat et al. 2023
-09710	Kakaako Pumping Station	The Kaka‘ako Pumping Station is listed on the State and National Registers of Historic Places (NRHP) (SIHP # 80-14-09710) and was placed on the HRHP on 17 August 1997 and was listed on the National Register of Historic Places (NRHP) on 4 October 1978 (#78001022). SIHP # -9710 is an architectural site rather than an archaeological site; and is listed under the NRHP under Criteria A and C.	NRHP Inventory-Nomination Form (Cummins 1973), Enanoria and Hammatt 2016
-09710 1	Kakaako Pumping Station	Understood to reference primary building	NRHP Inventory-Nomination Form (Cummins 1973), Enanoria and Hammatt 2016
-09964	U.S. Immigration Office	Consists of five buildings associated with the architect C.W. Dickey, completed by 1934	NRHP Inventory-Nomination Form (Fox and Riconda 1972)
No SIHP # assigned	Kewalo Incinerator 1	Incinerator Number One (Old Kewalo Incinerator) at 121 ‘Āhui Street built in 1930; the ash from the incinerator facilities was used to fill the area enclosed by the seawall constructed over the shallow reef at Ka‘ākaukukui in the late 1940s	Shideler 2002

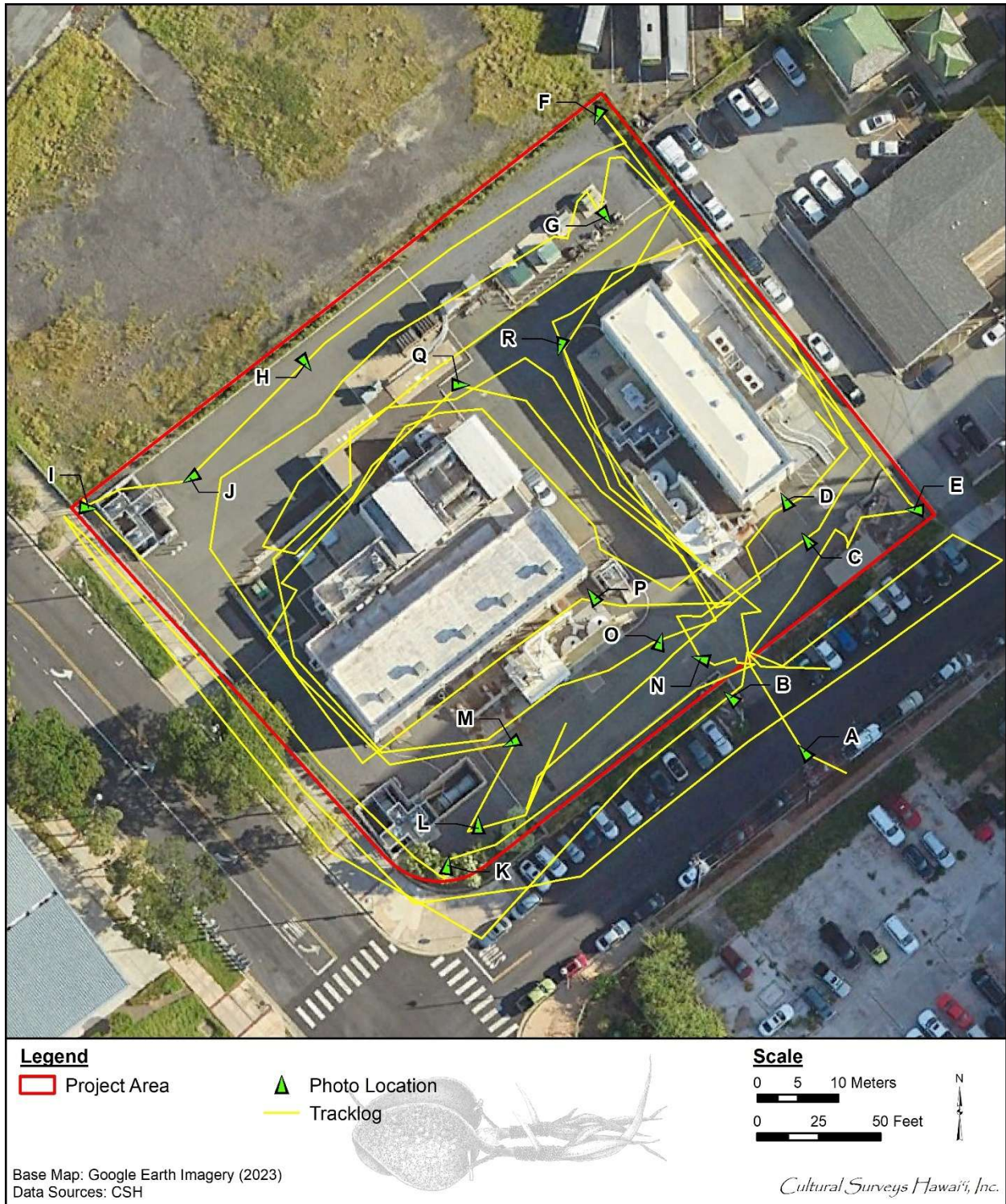


Figure 39. Archaeologist's tracklog with a key to the following photographs (showing the general location from which they were taken and their orientation) on a 2023 Google Earth aerial photograph



Figure 40. Photo A: View of entrance gate to the Ala Moana No. 1 WPS Improvements project area at 210 Keawe Street from across Keawe Street, view to northwest

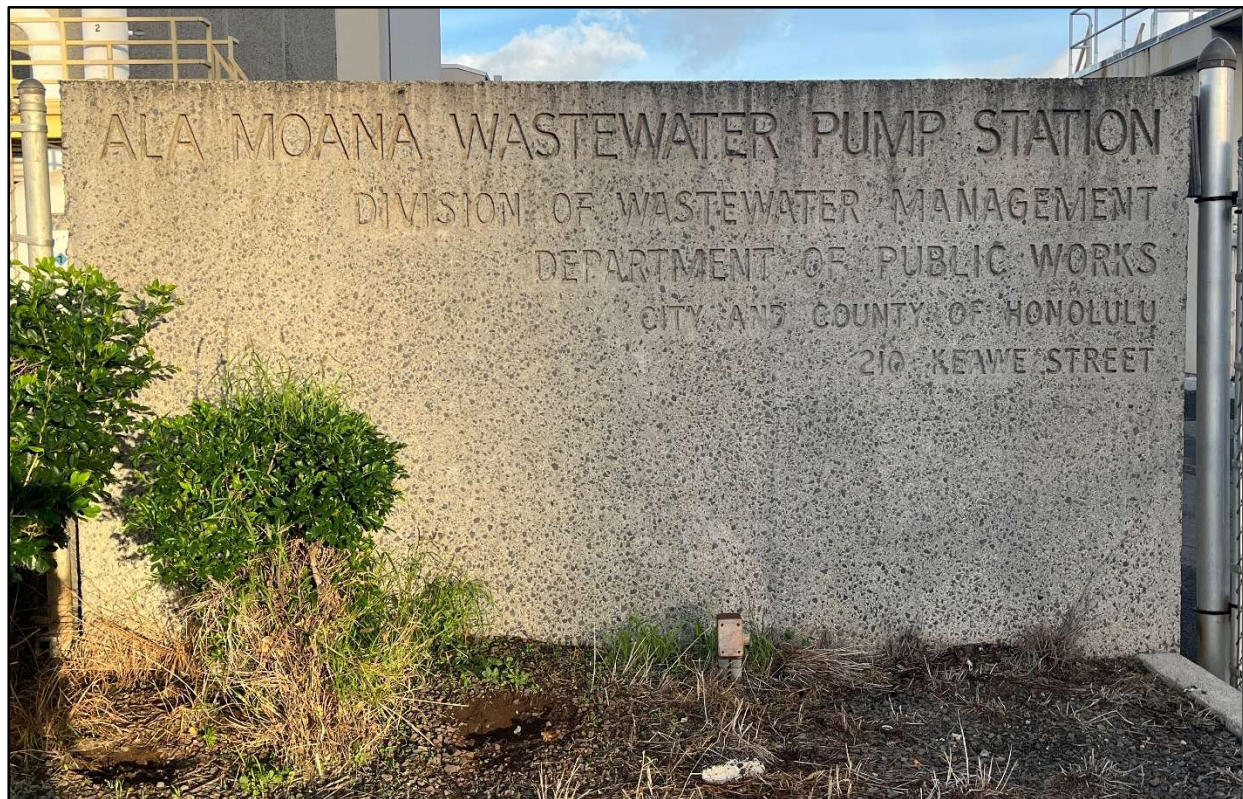


Figure 41. Photo B: View of entry sign “ALA MOANA WASTEWATER PUMP STATION DIVISION OF WASTEWATER MANAGEMENT DEPARTMENT OF PUBLIC WORKS CITY AND COUNTY OF HONOLULU 210 KEAWE STREET” on southwest side of main entry driveway, view to northwest



Figure 42. Photo C: View of the southeast end of the (1954) Ala Moana # 1 building, view to northwest



Figure 43. Photo D: Close-up view of sign “ALA MOANA #1 (1954)” on the southeast end of the Ala Moana # 1 building, view to northwest

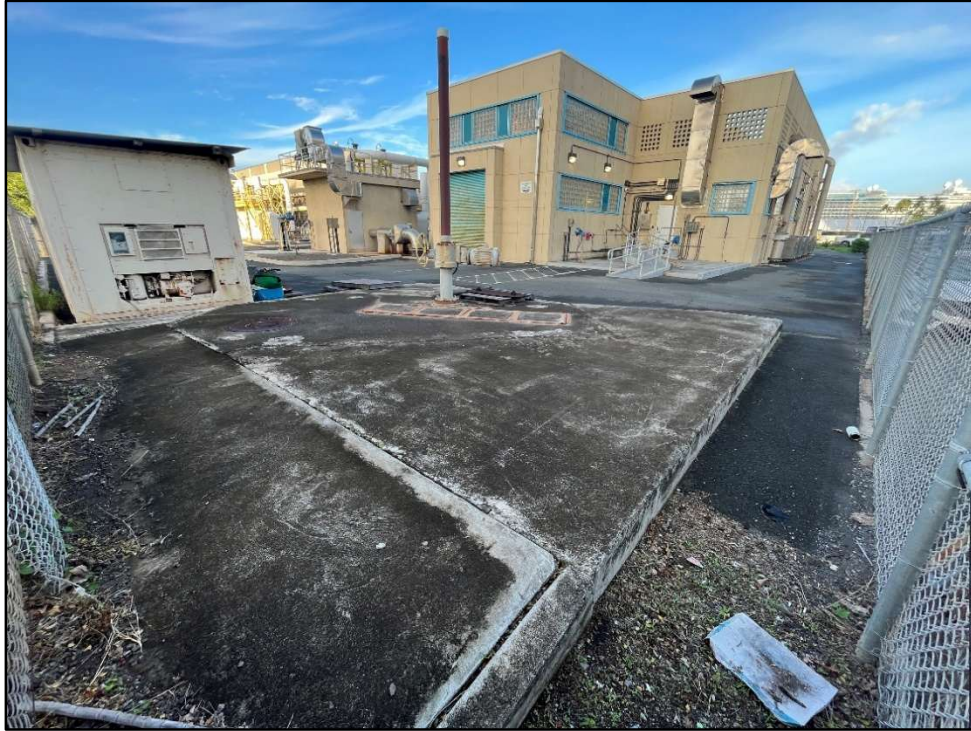


Figure 44. Photo E: General view from the east corner of the Ala Moana No. 1 WPS Improvements project area, view to west

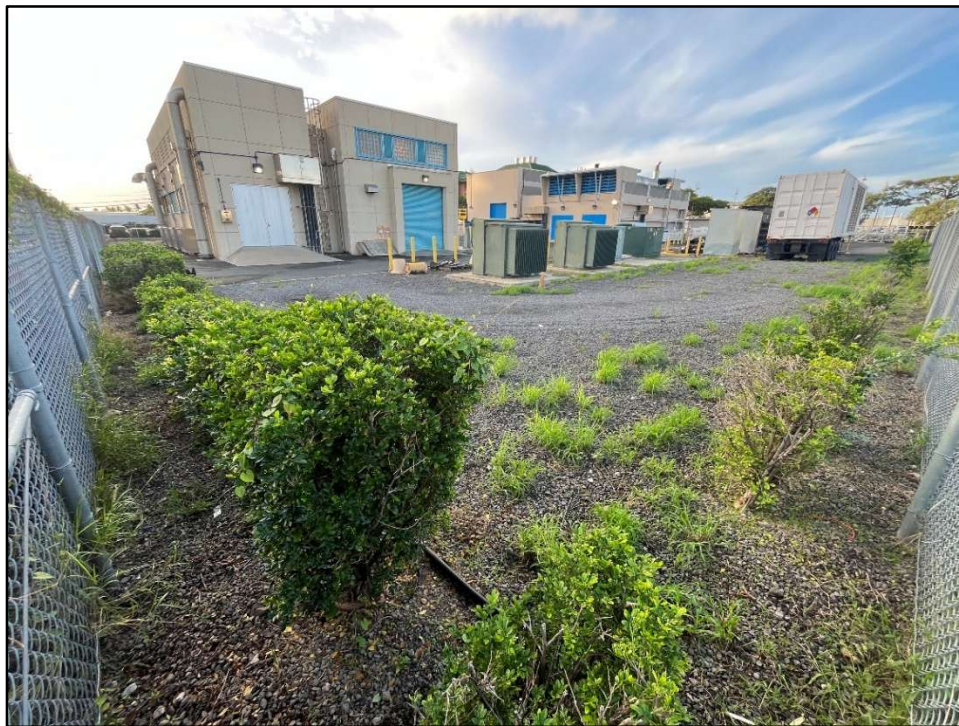


Figure 45. Photo F: General view from the north corner of the Ala Moana No. 1 WPS Improvements project area, view to southwest



Figure 46. Photo G: View of the northwest end of the (1954) Ala Moana # 1 building, view to southeast



Figure 47. Photo H: View of the northwest side of the (1983) Ala Moana # 2 building (this is the portion of the facility understood as the focus of the Improvements Project), view to southeast



Figure 48. Photo I: General view from the west corner of the Ala Moana No. 1 WPS Improvements project area, view to southeast

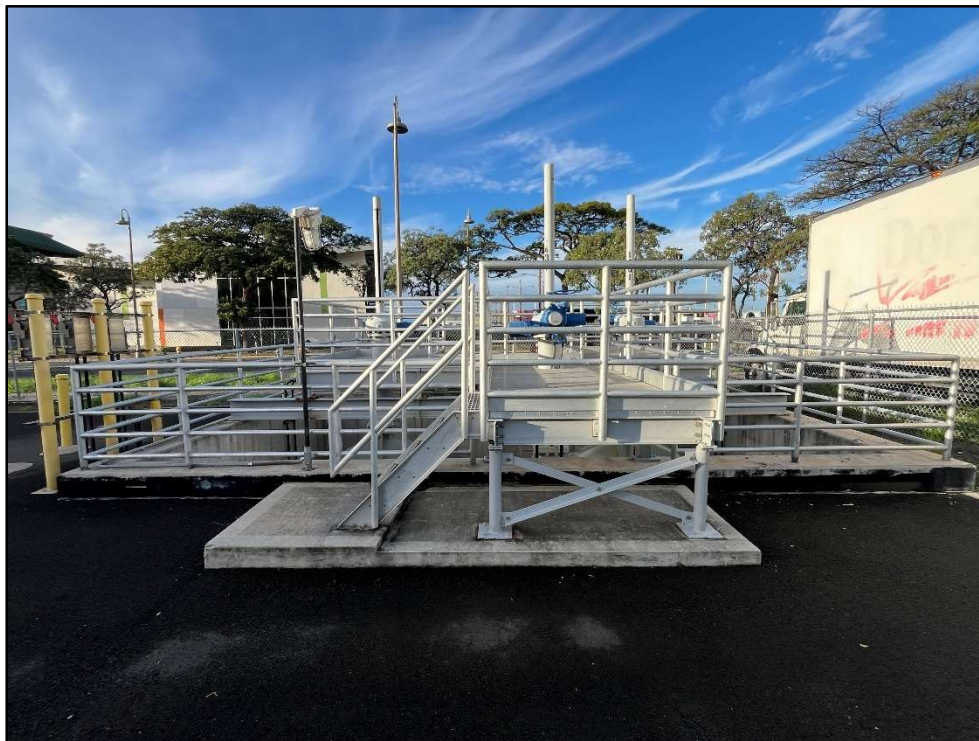


Figure 49. Photo J: View of infrastructure in the west corner of the Ala Moana No. 1 WPS Improvements project area, view to southwest (toward Ilalo Street)



Figure 50. Photo K: General view from the south corner of the Ala Moana No. 1 WPS Improvements project area, view to northeast



Figure 51. Photo L: View of the southeast side of the (1983) Ala Moana # 2 building, view to north



Figure 52. Photo M: View of infrastructure in the south corner of the Ala Moana No. 1 WPS, view to southwest

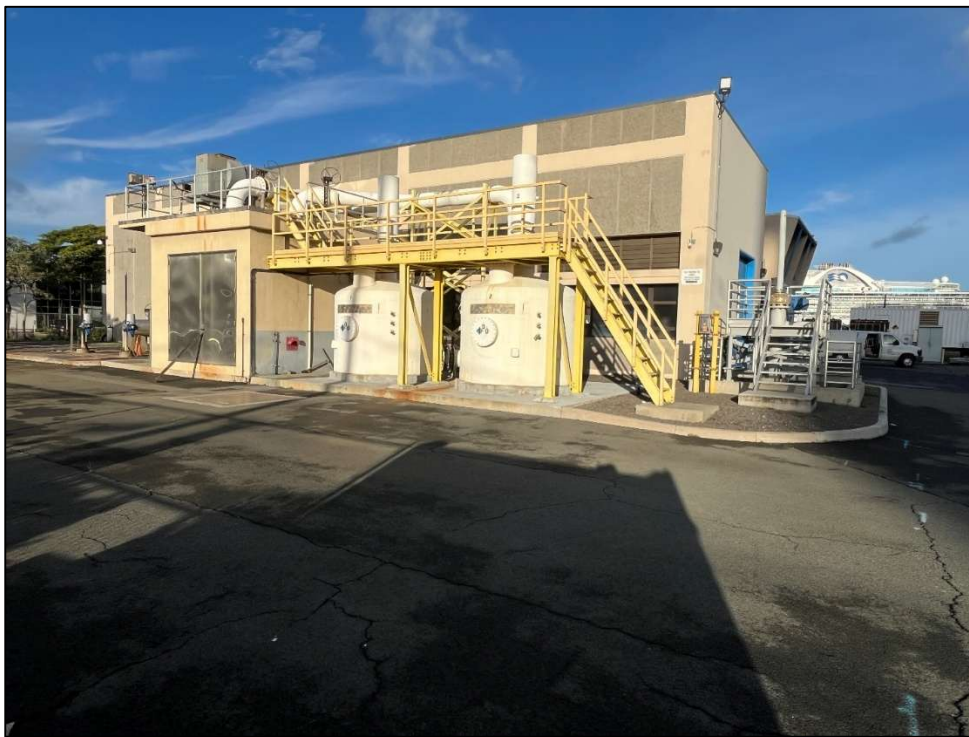


Figure 53. Photo N: General view of the northeast end and long southeast side of the (1983) Ala Moana # 2 building, view to northwest



Figure 54. Photo O: View of the southwest side of the Ala Moana # 1 building, view to northeast



Figure 55. Photo P: View of the “ALA MOANA #2 (1983)” sign on the east corner of the Ala Moana # 2 building, view to northwest



Figure 56. Photo Q: View of the long southwest side of the Ala Moana # 1 building, view to east



Figure 57. Photo R: View of the northeast side of the Ala Moana # 2 building, view to southwest

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Appendix B

Early Consultation Letter, Handout, and Responses

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**STATE OF HAWAI'I
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/>

DTS202512081608MO

Coastal Zone
Management
Program

December 31, 2025

Environmental Review
Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented
Development

Statewide Geographic
Information System

Statewide
Sustainability Branch

Mr. Aaron Teper
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813

Dear Mr. Teper:

Subject: Early Consultation Environmental Assessment for the Proposed Fuel Storage Tank Improvements for the Ala Moana No.1 Wastewater Pump Station, Honolulu, Oahu; Tax Map Key: (1) 2-1-015: 062

The Office of Planning and Sustainable Development (OPSD) is in receipt of your early consultation request, received December 8, 2025, on the preparation of an Environmental Assessment (EA), for the proposed fuel storage tank improvements for the Ala Moana No.1 Wastewater Pump Station (WWPS).

As required by Hawai'i Administrative Rules (HAR) Chapter 11-280.1, all underground storage tanks and piping must have secondary containment and use interstitial monitoring to detect releases from tanks and piping by July 15, 2028. To comply with current fuel storage regulations for environmental protection, the Department of Environmental Services, City and County of Honolulu, proposes to replace the existing underground fuel storage tank that serves Ala Moana No.1 WWPS with a new 10,000-gallon aboveground fuel storage tank. In addition, the project will replace the existing 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 OPSD has reviewed the subject request and has the following comments to offer:

1. The EA shall discuss the triggers for the preparation of an EA set forth in Hawai'i Revised Statutes (HRS) Chapter 343, as well as a list of all required permits and approvals. Furthermore, the EA should contain the project location maps, including the regional location on the Island of O'ahu, and provide schematic plans or drawing for the scope of the project.
2. The Hawai'i Coastal Zone Management (CZM) Area means all lands of the State and the area extending seaward from the shoreline to the limit of the

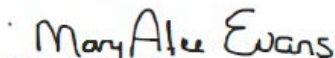
Mr. Aaron Teper
December 31,
2025 Page 2

State's police power and management authority. The Hawai'i CZM Law requires all state and county agencies to comply with the CZM objectives and policies. Pursuant to Hawai'i Revised Statutes (HRS)§ 205A-4, in implementing the objectives of the CZM Program, the agencies shall give full consideration to ecological, cultural, historic, esthetic, recreational, scenic, and open space values, and coastal hazards, as well as to needs for economic development. For information disclosure, the subject EA should include an assessment with mitigation measures, if needed, as to how the proposed project conforms to applicable CZM objectives and policies set forth in HRS§ 205A-2, as amended.

3. Pursuant to HRS§ 206E-8.5, notwithstanding Chapter 205A, all requests for developments within a special management area (**SMA**) and shoreline setback variances for developments on any lands within a community development district, for which a community development plan has been developed and approved in accordance with § 206E-5, shall be submitted to and reviewed by the lead agency as defined in Chapter 205A. The proposed project is located within the SMA of the Kaka'ako Community Development District. If the subject EA will serve as a supporting document for SMA use application, OPSD suggests that the EA specifically discuss compliance with the requirements of SMA use pursuant to HAR Chapter 15-150, as amended, which is available at <https://planning.hawaii.gov/czm/special-management-area-permits>.
4. The OPSD recommends that the EA discuss the site-specific Best Management Practices to prevent any runoff, sediment, soil and debris potentially resulting from associated excavation and 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 sea level rise on the project areas, the OPSD suggests the EA refer to the findings of the Hawai'i Sea Level Rise Vulnerability and Adaptation Report 2017 and its 2022 update, accepted by the Hawai'i Climate Change Mitigation and Adaptation Commission. The Report, and Hawai'i Sea Level Rise Viewer at <https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/> particularly identifies a 3.2-foot sea level rise exposure area across the main Hawaiian Islands which may occur in the mid to latter half of the 21st century. The EA should provide a map of the 3.2-foot sea level rise exposure area from passive flooding in relation to the project area and assess potential impacts of sea level rise on the proposed infrastructure and/or facilities.

If you respond to this comment letter, please include DTS202512081608MO in the subject line. For any questions regarding this letter, please contact Shichao Li of our office at (808) 587-2841 or by email at shichao.li@hawaii.gov.

Sincerely,


Mary Alice Evans
Director

**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
MEIA

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

ERWIN KAWATA
DEPUTY MANAGER
HOPE MANAKIA



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GENE C. ALBANO, P.E., Ex-Officio

January 6, 2026

Mr. Aaron Teper
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawai'i 96813

Dear Mr. Teper:

Subject: Your Letter Dated December 4, 2025, Requesting Comments on the Draft
Environmental Assessment Early Consultation for the Proposed Fuel Storage Tank
Improvements for the Ala Moana No.1 Wastewater Pump Station on Keawe Street in
Kaka'ako – Tax Map Key: 2-1-015: 062

Thank you for your letter regarding the proposed fuel storage tank improvements project.

The existing water system is currently adequate to accommodate the proposed development. However, please be advised that the existing Honolulu water system capacity has been reduced due to the shut-down of the Hālawā Shaft pumping station as a proactive measure to prevent fuel contamination from the Navy's Red Hill Bulk Storage Tank fuel releases. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval, pending evaluation of the water system conditions at that time on a first-come first-served basis. 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.

We continue to request 10% voluntary water conservation of all customers until new sources are completed and require water conservation measures in all new developments. If water consumption significantly increases, progressively restrictive conservation measures may be required to avoid low water pressures and disruptions of water service.

Presently, there is no moratorium on the issuance of new and additional water services. Water distributed via the BWS water systems remains safe for consumption. The BWS is closely monitoring water usage and will keep the public informed with the latest findings. Please visit our website at www.boardofwatersupply.com and www.protectoahuwater.org for the latest updates and water conservation tips.

Mr. Aaron Teper
January 6, 2026
Page 2

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 on-site graywater reuse in accordance with Hawai'i State Department of Health guidelines, rain catchment for nonpotable uses, stormwater capture, and the use of Water Sense labeled ultra-low flow water fixtures and toilets. Landscape elements should incorporate green infrastructure design, drought tolerant plants, xeriscaping, rain catchment, efficient irrigation systems such as a drip system and moisture sensors, and other Water Sense labeled fixtures and devices.

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,

A handwritten signature in blue ink, appearing to read "Ernest Y. W. Lau".

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

A small, stylized handwritten mark or signature in blue ink.

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

SYLWILUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'AINA



STATE OF HAWAII | KA MOKU'AINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES 1151 PUNCHBOWL
STREET, ROOM 330 HONOLULU, HAWAII 96813

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. KAHANE
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 (LMJ)
STATE PARKS

Date: 1/2/26
DAR# 7014

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: _Kate Gonzalez , Aquatic Biologist

Early Consultation Request for Draft Environmental Assessment (DEA) Fuel
SUBJECT: Storage Tank Improvements for the Ala Moana No.1 Wastewater Pump
Station

Request Submitted by: Townscape, Inc. on behalf of the City and County of Honolulu
210 Keawe St, Honolulu, Island of Oahu

Location of Project: _____ TMK 2-1-015:062

Brief Description of Project:

The Ala Moana Wastewater Pump Station (WWPS) consists of two facilities: Ala Moana No.1 WWPS in operation since 1953 and Ala Moana No.2 WWPS in operation since 1983. The proposed project involves replacing the existing underground fuel storage tank that serves Ala Moana No.1 WWPS with a new 10,000-gallon aboveground fuel storage tank. Additionally, the project includes replacing the existing underground fuel piping, fuel monitoring panel, and all associated sensors. as well as connectina the new fuel monitorina oanel to the suoervisorv

Comments:

D No Comments iii Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved:  Date: 01/05/2026 Date: _____

01/05/2026

for Brian J. Neilson
DAR Administrator

DAR# 1704

Brief Description of Project

storage tanks and piping must provide secondary containment and utilize interstitial monitoring.

The aboveground storage tank will supply the fuel required for the backup generator to service the WWPS.

DAR# 7014

Comments

Erosion/LBSP:

Sedimentation can introduce suspended solids, nutrients, and pollutants into aquatic ecosystems, leading to turbidity, reduced light penetration, and impaired water quality. Implement erosion and sediment control measures such as silt fences, sediment traps, and erosion control blankets to minimize soil disturbance and sediment runoff during construction activities.

Vegetation buffers: Maintain vegetative buffers along coastal areas to stabilize soil, reduce erosion, and filter sediment-laden runoff before it reaches the ocean.

Stormwater management: Implement stormwater management practices such as permeable pavement, vegetated swales, and retention ponds to reduce stormwater runoff volume and pollutant loads.

Monitoring and compliance: Consider establishing monitoring protocols to assess sedimentation levels, water quality parameters, and compliance with regulatory requirements throughout the project lifecycle.

DAR would like to request notification, photo-documentation, and GPS-coordinates for any occurrence where above-average amounts of sediment have entered the water, in order to assess impact, if any.

For all projects involving substantial grading, drainage, or proximity to surface waters, especially within a SMA, DAR stresses the importance of compliance with Hawai'i Water Quality Standards (HAR 11-54) and the Coastal Zone Management Act (HRS 205A). Early and ongoing consultation with DAR is strongly encouraged to ensure protection of Hawai'i's aquatic ecosystems.

DAR# 7014

Comments

Native Biota:

Chapter 13, Section 124, HAR, prohibits injuring or killing indigenous wildlife. During fledgling season for native seabirds, adults and fledglings migrate to the ocean. Artificial light can cause disorientation, which can result in crashing or falling. Groundings of fledgelings can cause injury or vulnerability to predators. Therefore, it is recommended that during construction all nighttime light sources are shielded and angled downward to reduce the risk of harm to native seabirds. Nighttime work that requires outdoor lighting should be avoided during the seabird fledgling season from September 15 through December 15. Post-construction, all permanent lighting should also be shielded or angled downward.

All on-site workers should be trained on recognizing State-listed waterbirds and seabirds (<https://dlnr.hawaii.gov/wildlife/birds/>). Should any State-listed waterbirds or seabirds be observed amid construction operations, all activities within a 100-foot radius (30 meters) must halt, and proximity to the bird must be avoided. Once the bird departs the area on its own, work can resume as usual.

Hawaii Wildlife Center

(808) 884-5000

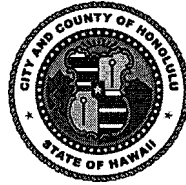
9:00 am – 5:00 pm, 7 days a week

Hawaii Marine Animal Response

(808) 220-7802

7:00am – 7:00pm, 7 days a week

RICK BLANGIARDI
MAYOR
MEIA



PO'O

HOPE PO'O

December 16, 2025

SENT VIA EMAIL

comments@townscapeinc.com
Mr. Aaron Teper

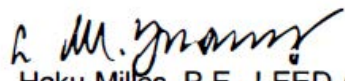
Dear Mr. Teper,

Subject: Early Consultation Request for Draft Environmental Assessment (DEA)
Fuel Storage Tank Improvements for the Ala Moana No. 1 Wastewater
Pump Station - Honolulu, Island of O'ahu; Tax Map Key: 2-1-015:062

Thank you for the opportunity to review and comment. The Department of Design
and Construction does not have any comments.

Should you have any questions, please call me at 808-768-8480.

Sincerely,

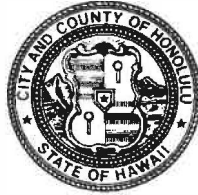

Haku Milles, P.E., LEED AP
Director

HM:cf (948501)

**DEPARTMENT OF FACILITY MAINTENANCE
KA 'OIHANA MĀLAMA HALE
CITY AND COUNTY OF HONOLULU**

1000 ULU'ŌHI'A STREET, SUITE 215, KAPOLEI, HAWAII 96707
PHONE: (808) 768-3343 • Fax: (808) 768-3381 • WEBSITE: honolulu.gov

RICK BLANGIARDI
MAYOR
MEIA



GENE C. ALBANO, P.E.
DIRECTOR AND CHIEF ENGINEER
PO'O A ME LUNA NUI 'ENEKINIA

WARREN K. MAMIZUKA
DEPUTY DIRECTOR
HOPE PO'O

IN REPLY REFER TO:
SWQ 25-307

February 17, 2026

Mr. Aaron Teper
Environmental and Community Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Mr. Teper:

Subject: Early Consultation Request for Draft Environmental Assessment for
Fuel Storage Tank Improvements for Ala Moana No. 1
Wastewater Pump Station, TMK: 2-1-015:062

Further to your request on the proposed Ala Moana No. 1 Wastewater Pump Station Fuel Storage Tank Improvement project, the Department of Facility Maintenance, Storm Water Quality Division (SWQ) hereby notes the following:

The City and County of Honolulu (City) has storm water assets in the project vicinity. It is imperative that during project construction, appropriate storm water and erosion control Best Management Practices (BMPs) be installed and maintained in and around the project area to prevent erosion and construction-related pollution from entering the City's storm drains, in compliance with the City's National Pollutant Discharge Elimination System (NPDES) Permit. The need for suitable and effective construction BMPs is underscored by the proximity of the project site to Māmalā Bay, listed as an impaired marine water on the Clean Water Act §303 (d) list (2024 State of Hawaii Water Quality Monitoring and Assessment Report).

In compliance with the City's NPDES permit, the SWQ expects adherence to construction and post-construction requirements of the Rules Relating to Water Quality 2018 (as amended), Hawaii Administrative Rules (HAR) 20-3. The SWQ also expects that the applicable requirements of the NPDES Water Pollution Control, HAR 11-55 for example for discharge of hydrotesting effluent, and dewatering effluent to state waters, will be met.

The SWQ is concerned that the impervious area of the site should not be increased as a result of the proposed project. A greater impervious surface area will increase the volume and negatively impact the quality of storm water runoff from the site. In this regard, the SWQ recommends that measures be put into place to capture, retain, and infiltrate/treat storm water onsite. This will help improve the quality of the runoff entering the impaired Mamala Bay. In the operations of the fuel storage tank (such as maintenance and refueling), there is a high potential for spills that may pollute storm water runoff. Therefore, the SWQ requires that adequate controls, both administrative and structural, be put in place to prevent and control any spill from the fuel tank and/or fuel piping/lines. In the event that the above ground storage container has aggregate storage capacity greater than 1,320 gallons, it may be subject to the U.S. Environmental Protection Agency Spill Prevention, Control, and Countermeasure rules (40 CFR Part 112) created under the Clean Water Act s. 311 U)(1)(C). In such a case, a Spill Prevention Control and Countermeasure Plan will be required.

Under the City's NPDES Municipal Separate Storm Sewer System Permit requirements (Permit No. HI S00002), the City would be required to develop a Site-Specific Best Management Practices (SSBMP) plan for similar City-owned and operated wastewater pump stations. For this reason, it is recommended that the consultant to the Department of Environmental Services (ENV) include the necessary scope and costs to develop the appropriate SSBMP plan for the facility, and have it completed prior to when the facility is actively in operation. Alternatively, if the facility qualifies as an "industrial" facility under the Standard Industrial Classification codes and complies with the State Department of Health (DOH) HAR 11-55, Appendix B, it would be eligible for coverage under the Industrial General Permit, and therefore a Storm Water Pollution Prevention Plan would be mandatory. The ENV shall notify the SWQ in advance to allow proper notification to the DOH and incoming submission of a Notice of General Permit Coverage permit application for the subject facility.

The SWQ recommends that sea level rise as well as passive (high tide) flooding be taken into account in the design of the above ground fuel storage tank to minimize failure and ensuing environmental impact.

If you have any questions, please contact Ms. Saani Fong, Planner VII of the SWQ by email at saani.fong@honolulu.gov or phone at (808) 768-3387.

Sincerely,


Digitally signed by
Albano, Gene
Date: 2026.02.17
11:07:39-10'00'
Gene C. Albano, P.E.
Director and Chief Engineer

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

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



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

December 10, 2025

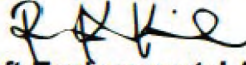
MEMORANDUM

FROM: TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources (kendall.i.tucker@hawaii.gov)
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rubyroa.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:
SUBJECT:

Ryan K.P. Kanaka'ole, First Deputy 
Early Consultation Request for Draft Environmental Assessment (DEA) Fuel Storage Tank Improvements for the Ala Moana No. 1 Wastewater Pump Station

LOCATION: TMK 2-1-015:062, Honolulu, Island of O'ahu, Hawai'i
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 by **January 2, 2026**. 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: Dina U. Lau, Acting Chief Engineer
Division: Engineering Division
Date: Dec 30, 2025

Attachment(s)

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. KAHANE
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

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

LD/Ryan K.P. Kanaka'ole

Ref: Early Consultation Request for Draft Environmental Assessment (DEA) Fuel Storage Tank Improvements for the Ala Moana No. 1 Wastewater Pump Station

Location: Honolulu, Island of O'ahu, Hawai'i

TMK(s): (1) 2-1-015:062

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

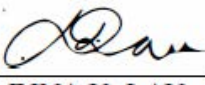
COMMENTS

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) (fhathawaii.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: Dec 30, 2025

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
MEIA



DAWN TAKEUCHI APUNA
DIRECTOR
PO'O

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

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

December 12, 2025

GEN-2025-373(MJM)

Mr. Aaron Teper
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Mr. Teper:

SUBJECT: Pre-Assessment Consultation
Fuel Storage Tank Improvements for the Ala Moana No. 1
Wastewater Pump Station (WWPS)
210 Keawe Street – Ala Moana
Tax Map Key 2-1-015: 062

This is in response to your request, received December 8, 2025, for early consultation comments on the upcoming Environmental Assessment to be prepared by the City and County of Honolulu Department of Environmental Services for the proposed fuel storage tank improvements for the Ala Moana No. 1 WWPS (Project). The proposed Project includes replacing the existing underground fuel storage tank that services Ala Moana No. 1 WWPS with a new 10,000-gallon aboveground fuel storage tank; replacing the existing underground fuel piping, fuel monitoring panel, and all associated sensors; and connecting the new fuel monitoring panel to the supervisory control and data acquisition system. The Project is required in order to comply with Hawaii Administrative Rules 11-280.1, which mandates that all underground storage tanks and piping must provide secondary containment and utilize interstitial monitoring.

The Project site is a 52,925-square-foot lot (1.215 acres) located within the Kakaako Community Development District (KCDD), which is under the zoning jurisdiction of the State of Hawaii Community Development Authority (HCDA). Additionally, the Project site is located in the State Land Use Urban District, and the Special Management Area (SMA). The Department of Planning and Permitting (DPP) has the following early consultation comments. The Draft Environmental Assessment (EA) must address:

1. Compliance with KCDD Regulations: The Draft EA must describe the Project's consistency with the use and development standards of the KCDD. The Project should be submitted for review and comment to the HCDA who may be contacted at (808) 594-0300 or through their website, <https://dbedt.hawaii.gov/hcda/>.
2. Compliance with Hawaii Revised Statutes (HRS) Chapter 205A: The Draft EA should describe compliance with HRS Chapter 205A (Coastal Zone Management). For more information, please refer to the following:
 - HRS Chapter 205A is available online at:

<https://law.justia.com/codes/hawaii/title-13/chapter-205a/>
3. Planning Policies: The Draft EA should describe the Project's consistency with the Oahu General Plan, and the Primary Urban Center Development Plan.
4. Existing and Proposed Structures: The aerial photograph indicates that the site is currently developed. The Draft EA should describe all existing or proposed structures, including when the existing structures were built, and identify any associated building permits or other land use approvals.
5. Archaeological, Cultural, and Historic Resources: The Draft EA should include an analysis of the potential impacts to archaeological, cultural, and historic resources. If potential impacts are anticipated as a result of the Project, describe the appropriate mitigation to be implemented.
6. Flood Hazards: The subject property is located within Zones AE (with a Base Flood Elevation of five feet), and X, as mapped by the Federal Emergency Management Agency. Flood Zone AE (the eastern side of the site) consists of those areas subject to inundation by a one-percent annual chance floodplain. Therefore, the Draft EA should discuss flood hazards which may reasonably be present or occur on the site over the course of the lifetime of the proposed project. The Draft EA should further evaluate the proposed Project's compliance with the City's Flood Hazard Areas Ordinance (Revised Ordinances of Honolulu Chapter 21A), which is available online at:

honolulu.gov/dpp/resources/ordinances/

7. Coastal Hazards: The Project site is susceptible to coastal hazards associated with sea level rise (SLR), wave action, flooding, tsunamis, and storm surge. Therefore, proposed development activities must be evaluated not only for potential impacts to sensitive SMA resources, but also for current and future susceptibility to these coastal hazards. According to the State of Hawaii SLR Viewer, the western corner of the Project site may be affected by 0.5-foot of SLR and annual high wave flooding by 2030. By 2100, the western corner and eastern portion of the Project site are projected to be impacted under a scenario of 3.2-foot of SLR and annual high wave action. As it is likely that SLR will increase the risk of structure and electrical damage, the Draft EA should discuss how the design of the Project and proposed future renovations will address these impacts.

The analysis in the Draft EA should evaluate the site's existing topographic, geologic, and shoreline environment, and explain how a proposed development can safely be located outside of the 3.2-foot SLR-Exposure Area, and avoid impacts associated with other coastal hazards. The Draft EA should also explore project alternatives, site design (siting and configuring the proposed building as far from the shoreline as possible), project design features (elevated structures, alternative foundations, etc.), Best Management Practices, and appropriate mitigation measures to reduce potential impacts related to coastal hazards to the extent possible.

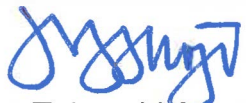
8. Sensitive Species: The Draft EA should identify the presence or potential presence of any sensitive habitat, flora, or fauna. The DPP recommends reaching out to the U.S. Fish and Wildlife Service to obtain a list of species that are known to occur or may potentially occur in the Project vicinity. If applicable to the site, the Draft EA should provide standard agency-required mitigation measures and any applicable site-specific mitigation measure to avoid or minimize potential impacts to each identified species, critical habitat, and habitat.
9. Cumulative Impacts Assessment: the Draft EA should include an evaluation of the how the Project combined with other past, present, and reasonably foreseeable development in the vicinity of the Project may result in cumulative impacts to land use or SMA resources. Cumulative impacts are generally limited to those issue areas where impacts cannot be avoided or mitigated at the site-specific level. We recommend reviewing the State Office of Planning and Sustainable Development's *Cumulative Effects/Impacts Assessment Guidance in Special*

Mr. Aaron Teper
December 12, 2025
Page 4

Management Area Permitting (April 2022) in determining the scope of the cumulative impacts analysis to be undertaken.

The DPP may have further comments regarding the Draft EA when more detailed plans and information are provided. Should you have any questions, please contact Michael Marchak, of our Land Use Approval Branch, at (808) 768-8806 or via email at michael.marchak@honolulu.gov.

Very truly yours,


for Dawn Takeuchi Apuna
Director



Outlook

RE: Draft EA Fuel Storage Tank Improvements Ala Moana No. 1 WW Pump Station

From Bungcayao, Michael <michael.bungcayao@hawaiianelectric.com>

Date Thu 12/11/2025 11:09 AM

To Townscape <comments@townscapeinc.com>; Aaron Teper <aaron@townscapeinc.com>

Cc Liu, Rouen <rouen.liu@hawaiianelectric.com>; Kakazu, Lisa <lisa.kakazu@hawaiianelectric.com>; Kuwaye, Kristen <kristen.kuwaye@hawaiianelectric.com>

Aloha Aaron Teper,

Thank you for the opportunity to review and comment on the subject project.

Hawaiian Electric Company has no objections to its advancement. Please note that if Hawaiian Electric has existing infrastructure on the subject property, continued access will be necessary for the maintenance of our infrastructure.

We greatly appreciate your efforts to keep us informed throughout the planning process. As the proposed Ala Moana No. 1 WW Pump Station project progresses, we kindly ask that you continue to keep us informed.

Please do not hesitate to contact us should you have any questions or require further clarification.

MICHAEL JAY BUNGCAO

O: 808.543.7075 | **M:** 808.970-4681

michael.bungcayao@hawaiianelectric.com

Hawaiian Electric

PO Box 2750, Honolulu, HI 96840



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Appendix C

Historic Preservation Review Response

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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**

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

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. KAHANE
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

May 22, 2026

Roger Babcock, Director
City and County of Honolulu (CCH)
Department of Environmental Services (ENV)
Division of Wastewater Engineering and Construction (WEC)
1000 Ulu'ohi'a Street, Suite 308
Kapolei, Hawai'i 96707
roger.babcock@honolulu.gov

IN REPLY REFER TO:
Project No.: 2026PR00420
Doc. No.: 2605JN07
Archaeology, Architecture

Dear Roger Babcock:

**SUBJECT: Hawaii Revised Statutes (HRS) §6E-8 Historic Preservation Review –
Request for Concurrence with an Effect Determination
Ala Moana No. 1 Wastewater Pump Station Improvements Project
210 Keawe Street, Honolulu, HI 96813
Honolulu (Kaka'ako) Ahupua'a, Kona (Honolulu) District, Island of O'ahu
TMK: (1) 2-1-015:062 por.**

This letter provides the State Historic Preservation Division's (SHPD's) review of the City and County of Honolulu (CCH), Department of Environmental Services (ENV), Division of Wastewater Engineering and Construction (WEC) project titled, Ala Moana No. 1 Wastewater Pump Station Improvements. The SHPD received the initial project submittal on April 28, 2026 (Submission No. 2026PR00420.01), which included construction plans, HRS §6E Submittal Form, a TMK map, a project photograph, a letter dated April 10, 2026 from ENV initiating HRS Chapter 6E review and requesting the SHPD's concurrence with ENV's effect determination of "No historic properties affected" for the proposed project. Also provided was an archaeological literature review and field inspection (LRFI) report by Cultural Surveys Hawaii (CSH), titled, *Draft Archaeological Literature Review and Field Inspection of the Ala Moana No. 1 Wastewater Pump Station Improvements Project, 210 Keawe Street, Kaka'ako Makai, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu, TMK: (1) 2-1-015:062* (Shideler and Hammatt, January 2026).

The HRS 6E Submittal Form and Shideler and Hammatt (January 2026) indicate that the project area comprises a 0.03-acre portion of the City and County of Honolulu owned 1.215-acre parcel [TMK: (1) 2-1-015:062, at 210 Keawe Street].

The proposed scope-of-work (SOW) consists of replacing the existing 10,000-gallon diesel fuel underground storage tank (UST) with an aboveground storage tank (AST). The fuel piping, fuel monitoring panel, and all sensors will be replaced. Ground disturbance will not include the entire parcel but restricted to the central-northwest portion of the facility. The new AST will involve a concrete slab with cradle supports and minimal ground disturbances. The concrete slab will be about 33'-7½" x 10'-0½" x 1'-2" in size with bollards about 1'-6" in diameter and a depth of about 3'-4". New fuel piping will be above ground along the east wall and will also involve minimal ground disturbances. An approximately 7-meter section of new, small-diameter fuel line will connect with the southeast corner of the existing Wastewater Pump Station (WWPS) building. The SHPD review of the construction plans indicated that the existing 10,000-gallon UST, existing fuel line, and vent line will be removed. A new AST will be constructed in the same footprint of the previous UST, along with 35 new bollards, and new underground conduit in the same footprint as existing

fuel line. Removed fuel line trenches will be backfilled and compacted with gravel. Trenches will vary from 2' to 3' wide and up to 3' deep.

Shideler and Hammatt (January 2026) indicate that the project parcel is located on reclaimed land that was formerly shallow marine flats and may have been infilled by 1891. Map research indicated that a crematory was in the project parcel in 1891, 1911, and 1922. Furthermore, the project area was a part of Fort Armstrong and included standing structures related to the fort as late as 1957. Bordering to the north of the project area is the Kaka'ako Pumping Station, listed in both the Hawaii and National Registers of Historic Places (SIHP No. 50-80-14-09710, NR # 78001022). Shideler and Hammatt (January 2026) also indicate that the extant Ala Moana No. 1 building within the project area was constructed in circa (ca.) 1954. The single other extant building on the parcel, Ala Moana No.2, was constructed in ca. 1983. The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (2026) identifies the soils as "Fill land, mixed" (FL). Low potential exists for the project to adversely impact intact subsurface historic properties.

The current project will not impact Fort Armstrong's (SIHP No. 50-80-14-09710) Kaka'ako Pumping Station's (SIHP No. 50-80-14-09710, NR # 78001022), or Ala Moana No. 1's (ca. 1954) historic integrity, or remove any distinctive materials or alter historic features, spaces, and spatial relationships that characterize the properties. Therefore, the proposed project will not affect the design, workmanship, materials, setting, location, association, and feeling of these historic properties.

Based on the information provided, the **SHPD concurs** with the ENV's determination of "**No historic properties affected**" for the proposed project. Pursuant to HAR §13-275-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence and historic preservation review ends.

SHPD hereby notifies the ENV that the HRS Chapter 6E historic preservation review process is ended for the current project. The project permitting and initiation processes may continue.

Please attach to the permit: In the unlikely event that subsurface historic resources, such as human skeletal remains, structural remains, cultural deposits, artifacts, sand deposits, or sink holes are discovered during demolition and/or construction work, the work should be stopped in the immediate area of the discovery. The find should be protected from further disturbance, and the State Historic Preservation Division should be contacted at (808) 692-8015.

Please contact Mary Kodama, Architecture Branch Chief, at Mary.Kodama@hawaii.gov, for any questions regarding architectural resources, and contact Joshua Newman, O'ahu Archaeologist, at Joshua.Newman@hawaii.gov, for any questions regarding archaeological resources or this letter.

Aloha,



Jessica Puff, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Audrey Uyema Pak, audrey.uyemapak@honolulu.gov
Gabrielle Sham, gabrielle@townscapeinc.com
Scott Belluomini, sbelluomini@culturalsurveys.com
David Shideler, submittals@culturalsurveys.com

Appendix D

Draft EA Notification Letter, Comments, and Responses



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

May 15, 2026

Subject: Notice of Availability for Review - Draft Environmental Assessment (EA)
Fuel Storage Tank Improvements Ala Moana No.1 Wastewater Pump Station –
Honolulu, Island of O‘ahu; Tax Map Key 2-1-015:062

Dear Participant,

On behalf of the City and County of Honolulu Department of Environmental Services, we are pleased to inform you that the **Draft Environmental Assessment (EA)** for the **Fuel Storage Tank Improvements at the Ala Moana No.1 Wastewater Pump Station** will be published on May 8, 2026 in the State Office of Planning and Sustainable Development’s semi-monthly publication, *The Environmental Notice*. A 30-day comment period will commence on May 8, 2026 and end on June 8, 2026.

How to Access the Draft EA:

1. **Online:** https://files.hawaii.gov/dbedt/erp/Doc_Library/2026-05-08-OA-DEA-Fuel-Storage-Tank-Improvements-Ala-Moana-No-1-Wastewater-Pump-Station.pdf
2. **Hard copy:**
 - Liliha Public Library: 1515 Liliha St, Honolulu, HI 96817
 - Hawai‘i Documents Center: 478 South King Street, Honolulu, HI 96813

How to Submit Comments:

- **Email:** comments@townscapeinc.com
- **Mail:** Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813

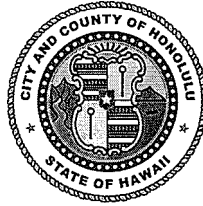
Sincerely,

Aaron Teper
Planner

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
MEJA



DAWN TAKEUCHI APUNA
DIRECTOR
PO'O

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

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

May 19, 2026

GEN-2025-373(MJM)

Mr. Aaron Teper
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawai'i 96813

Dear Mr. Teper:

SUBJECT: Request for Comments – Draft Environmental Assessment (EA)
Fuel Storage Tank Improvements for the Ala Moana No. 1
Wastewater Pump Station (WWPS)
210 Keawe Street – Ala Moana
Tax Map Key 2-1-015: 062

This is in response to your request, received May 11, 2026, for comments on the Draft EA prepared by the City and County of Honolulu Department of Environmental Services (the ENV) for the proposed fuel storage tank improvements for the Ala Moana No. 1 WWPS (Project). The proposed Project includes replacing the existing underground fuel storage tank that services Ala Moana No. 1 WWPS with a new 10,000-gallon aboveground fuel storage tank; replacing the existing underground fuel piping, fuel monitoring panel, and all associated sensors; and connecting the new fuel monitoring panel to the supervisory control and data acquisition system. The Project is required in order to comply with Hawaii Administrative Rules 11-280.1, which mandates that all underground storage tanks and piping must provide secondary containment and utilize interstitial monitoring by July 15, 2028.

The Project site is a 52,925-square-foot lot (1.215 acres) located within the Kakaako Community Development District (KCDD), which is under the zoning jurisdiction of the State of Hawaii Community Development Authority (HCDA). Additionally, the Project site is located in the State Land Use Urban District, and the Special Management Area (SMA). The Department of Planning and Permitting (DPP) has the following comments on the Draft EA as they relate to our pre-consultation letter dated December 12, 2025:

1. Compliance with KCDD Regulations (Section 3.3): The Final Kaka'ako Community Development District Makai Area Plan was published by the Hawaii Community Development Authority (HCDA) in December 2023 (2023 MAP). The analysis and discussion presented in this Draft EA appear to be mostly centered on the 2011 Kaka'ako Makai Conceptual Master Plan. We recommend evaluating the Project's consistent with the use and development standards of the 2023 MAP.
2. Planning Policies (Sections 2.4.1, 3.6, & 3.7): The DPP concurs that the Project is not anticipated to impact any visual resources deemed significant by the Primary Urban Center Development Plan (PUCDP). The DPP further agrees that the Project aligns with the objectives and policies of the Oahu General Plan and the PUCDP.
3. Flood Hazards (Section 2.1.3): The DPP concurs with the proposed Project design to elevate the bottom of the aboveground storage tank eight feet above mean sea level. The subject property is located within Flood Zone AE with a Base Flood Elevation of five feet, as mapped by the Federal Emergency Management Agency. The Project must comply with the City's Flood Hazard Areas Ordinance (Revised Ordinances of Honolulu Chapter 21A).
4. Coastal Hazards (Section 2.1.3): The DPP supports the proposal to locate the Project in the north/central area of the Project site, which is not projected to be impacted by 0.5-feet or 3.2-feet sea level rise according to the State of Hawai'i Sea Level Rise Viewer.
5. Cumulative Impacts Assessment (Section 6): The DPP agrees the Project is limited in scope and no larger impact on the environment is expected. However, were other past, present, and future projects in the vicinity analyzed in conjunction with this Project? The KCDD is an area undergoing rapid redevelopment. Will the Project combine with other past, present, and reasonably foreseeable development in the vicinity result in cumulative impacts to land use or SMA resources?

Mr. Aaron Teper
May 19, 2026
Page 3

The DPP appreciates the opportunity to offer comments regarding the Draft EA. Should you have any questions, please contact Michael Marchak, of our Land Use Approval Branch, at (808) 768-8806 or via email at michael.marchak@honolulu.gov.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Dawn Takeuchi Apuna'.

For: Dawn Takeuchi Apuna
Director

cc: Aaron Teper (APPLICANT) via email comments@townscapeinc.com



June 9, 2026

Dawn Takeuchi Apuna, Director
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

Subject: Response to Comments on the Draft Environmental Assessment (EA)
Ala Moana No.1 Wastewater Pump Station (WWPS) Improvements
Honolulu, O'ahu, TMK (1) 2-1-015:062

Dear Ms. Apuna:

Thank you for providing comments on the Draft EA for the Ala Moana No.1 WWPS Improvements Project. The project team reviewed the letter dated May 19, 2026 and offers the following responses to the comments:

1. Compliance with KCDD Regulations (Section 3.3): Section 3.3 of the Final EA has been revised to include more information from the Final Kaka'ako Community Development District Makai Area Plan (2023 MAP). Furthermore, a comprehensive consistency analysis was conducted, assessing the project's compliance with the use and development standards outlined in the 2023 MAP. Please refer to Section 3.3 of the Final EA for more details.
2. Planning Policies (Sections 2.4.1, 3.6, & 3.7): We appreciate DPP's concurrence that the project is not anticipated to impact any visual resources deemed significant by the Primary Urban Center Development Plan and that it aligns with the objectives and policies of the O'ahu General Plan.
3. Flood Hazards (Section 2.1.3): We appreciate DPP's concurrence with the proposed action of elevating the aboveground storage tank eight feet above mean sea level (three feet above the site's Base Flood Elevation). We are aware of the site's location in Flood Zone AE, a high hazard flood area, which requires compliance with the Revised Ordinances of Honolulu Chapter 21A, the Flood Hazard Ordinances. The proposed actions will comply with the requirements of the Flood Hazard Ordinances. Please refer to Section 2.1.3 of the Final EA for more information.
4. Coastal Hazards (Section 2.1.3): We appreciate DPP's support of the proposed project site, as it ensures the development will not be impacted by 0.5 or 3.2 feet of sea level rise, according to the State of Hawai'i Sea Level Rise Viewer.

5. Cumulative Impacts Assessment (Section 6): To further investigate cumulative impacts associated with the project, Section 2.8 “Cumulative Impact Assessment” and Figure 14 were added in the Final EA. Section 2.8 provides an in-depth analysis of ongoing development in the general vicinity of the project site. First, we analyzed historical building permits for each TMK within a 500-foot radius, prioritizing projects approved within the last five years. Second, we reviewed the DPP Public Input and SMA Minor Maps to investigate if any permits were issued in the general vicinity of the site. Finally, we researched historic environmental assessments to find any past, present, or future projects are located near the project site.

According to our research, only one major development project was identified near the project area, the Block C development mauka of Ala Moana Boulevard. The analysis identified that the Block C development and other significant mixed-use residential and commercial projects in Kaka’ako are rapidly urbanizing the region, increasing population and land use, and continuing the transformation of Kaka’ako into a major population center of Honolulu. Alternatively, our analysis indicated that much of this development is outside the 500-foot radius of the Ala Moana No.1 WWPS, in Mauka Kaka’ako. Makai Kaka’ako, where the project is located, is not anticipated to undergo similar rapid urbanization. It is expected to maintain its mixed-use industrial, recreational, and commercial uses. Most projects within the 500-foot radius of the WWPS are limited in scope, focusing on internal site repairs to existing structures. Considering the projects near the Ala Moana No.1 WWPS, along with other past, present, and reasonably foreseeable development, the proposed actions will not result in cumulative impacts to SMA resources. Rather, the project is intended to help protect SMA resources by reducing potential fuel leaks into the environment. Please refer to Section 2.8 of the Final EA for a more comprehensive accounting of the cumulative impact assessment.

Thank you again for providing comments on the Draft EA.

Sincerely,



Aaron Teper, Planner
Townscape, Inc.

Cc: Audrey Uyema Pak (via email to: audrey.uyemapak@honolulu.gov)
Michael Marchak (via email to: michael.marchak@honolulu.gov)

Townscape

From: Uehira, Erin <erinc.uehira@hawaiianelectric.com>
Sent: Wednesday, May 27, 2026 9:40 AM
To: Townscape
Cc: Liu, Rouen
Subject: Notice of Availability for Review - Draft Environmental Assessment (EA) Fuel Storage Tank Improvements Ala Moana No. 1 Wastewater Pump Station - Honolulu, Island of Oahu; Tax Map Key 2-1-015:062
Attachments: 2026 05 07_Fuel Storage Tank Improvements Ala Moana No.1 WW Pump Station.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Project Team,

Thank you for the opportunity to review and comment on the subject project. Hawaiian Electric Company has no objections to the proposed project. Please note that if Hawaiian Electric has existing infrastructure on the subject property, continued access will be necessary for the maintenance of our infrastructure. Also, should the project impact existing Hawaiian Electric facilities, please contact us.

We greatly appreciate your efforts to keep us informed throughout the planning process. As the proposed Fuel Storage Tank Improvements Ala Moana No. 1 Wastewater Pump Station Project comes to fruition, please continue to keep us informed.

Should you have any questions or require further clarification, please contact me.

Thank you,
Erin

ERIN UEHIRA

Permits Planning, Transmission & Distribution Engineering

O: 808-543-7880 | **M:** 808-970-3114

E: erinc.uehira@hawaiianelectric.com

Hawaiian Electric

• P.O. Box 2750 Honolulu, HI 9684

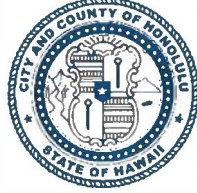


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HONOLULU POLICE DEPARTMENT
KA 'OIHANA MĀKA'I O HONOLULU
CITY AND COUNTY OF HONOLULU

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



RICK BLANGIARDI
MAYOR
MEIA

RADE K. VANIC
INTERIM CHIEF
KAHU MĀKA'I KŪIKAWA

BRANDON NAKASATO
RAYNOR M. IKEHARA
INTERIM DEPUTY CHIEFS
NA HOPE LUNA NUI MĀKA'I KŪIKAWA

OUR REFERENCE **EO-THS**

May 19, 2026

SENT VIA EMAIL

Mr. Aaron Teper
comments@townscapeinc.com

This is in response to your letter dated May 7, 2026, notifying of the publication of the Draft Environmental Assessment and requesting comments for the Fuel Tank Storage Improvements at the Ala Moana No. 1 Wastewater Pump Station at 240 Keawe Street in Honolulu.

Based on the information provided, the Honolulu Police Department recommends providing adequate notice to area residents and businesses prior to any road closures, as any impact to pedestrian and/or vehicular traffic could lead to complaints.

If you have any questions, please call Major Paul Okamoto of District 1 (Central Honolulu) at (808) 723-3327.

Sincerely,

A handwritten signature in black ink, appearing to read "Carlene Lau", is written over a horizontal line. The signature is fluid and cursive.

Carlene Lau
Acting Assistant Chief of Police

Townscape

From: Leialoha Makuanani <andream@oha.org>
Sent: Tuesday, May 26, 2026 1:07 PM
To: Townscape
Cc: Kamakana Ferreira
Subject: OHA Comments Re: DEA, Fuel Storage Tank Improvements - Ala Moana No. 1 WWPS, Honolulu, O'ahu

Follow Up Flag: Follow up
Flag Status: Flagged

Aloha kākou,

The Office of Hawaiian Affairs (OHA) received your letter dated May 7, 2026, requesting comments on the Draft Environmental Assessment (DEA) for the Honolulu Department of Environmental Services' (ENV) proposed Fuel Storage Tank Improvements project at the Ala Moana No. 1 Wastewater Pump Station (WWPS) at Honolulu, O'ahu [TMK: (1) 2-1-015:062]. The proposed action includes replacement of the existing 10,000-gallon underground fuel storage tank (UST) serving the WWPS with a new aboveground fuel storage tank (AST), replacement of underground fuel piping, replacement of the fuel monitoring panel and associated sensors, and connection of the new fuel monitoring system to the supervisory control and data acquisition (SCADA) system. OHA provides the following comments.

Historic and Archaeological Resources

The DEA states that the project area is located within Makai Kaka'ako, a highly urbanized and filled coastal landscape that historically consisted of shallow reef flats, fishponds, and salt ponds that supported traditional Hawaiian fishing and salt production practices. The document further notes that more than fifty archaeological studies have been conducted within the broader Makai Kaka'ako area and that several historic properties and burial sites have been previously identified in the vicinity.

Although the Archaeological Literature Review and Field Inspection (ALRFI) concludes that no historic properties are anticipated to be affected and notes that the project area consists primarily of fill land and previously disturbed surfaces, OHA recommends archaeological monitoring during ground disturbing activities. OHA recognizes that the project footprint is limited and located within an area that has undergone substantial prior disturbance; however, Makai Kaka'ako remains a historically and culturally sensitive landscape with known nearby burials along Ala Moana boulevard (where the shoreline once existed), historic properties, and potential historic infrastructure. The project is only a block away from the old shoreline and on an adjacent parcel to the historic Kaka'ako Pump Station (currently utilized for Nā Kūpuna Makamae Center). Given the proposed excavation and trenching activities, archaeological monitoring would provide an added measure of protection.

Cultural Consultation

OHA further notes that the DEA does not indicate that any cultural consultation or cultural impact assessment was conducted beyond the archaeological review process. While OHA does not currently foresee significant cultural concerns associated with the project's limited scope and utility-related purpose, OHA reminds the applicant and approving agency that cultural impacts should be evaluated separately from archaeological impacts. Under Article XII, Section 7 of the Hawai'i Constitution, the State and its agencies have an affirmative duty to reasonably protect Native Hawaiian traditional and customary rights. Additionally, under HRS Chapter 343 and the Environmental Review Program's (formerly OEQC) *Guide to Implementation and Practice of the*

Hawaii Environmental Policy Act, 2012 Edition, cultural impacts, including impacts to traditional and customary practices, should be considered as part of environmental review. OHA notes that archaeological review alone does not necessarily address whether there are ongoing cultural practices, cultural associations, or community knowledge connected to a project area or surrounding landscape. The environmental review process should include reasonable efforts to consult with knowledgeable community members, cultural practitioners, or organizations where appropriate in order to better understand whether cultural resources or practices may be affected. Although the project appears unlikely to result in substantial impacts due to its confined scope within an existing developed facility, some level of cultural outreach or consultation would help ensure that cultural considerations have been appropriately evaluated independent of the archaeological review process. Minimally, reach out to Nā Kūpuna Makamae Center, the O'ahu Island Burial Council (OIBC), and the State Historic Preservation Division for any known recognized descendants in the area.

Mahalo for the opportunity to comment. Please feel free to contact me should you have any questions.

Mahalo,

A. Leialoha Mākuanani, J.D. (she/her/'o ia)
'Aho Pueo Kia'i Kānāwai / Compliance Advocate
Office of Hawaiian Affairs | Advocacy Division
4405 Kukui Grove St., Ste 103, Lihue, HI 96766
Ph: 808-582-0494 | Em: andream@oha.org



www.oha.org



June 23, 2026

A. Leialoha Mākuanani, J.D.
'Aho Pueo Kia'i Kānāwai / Compliance Advocate
Office of Hawaiian Affairs
Sent via email: andream@oha.org

Subject: Response to Comments on the Draft Environmental Assessment (EA)
Ala Moana No.1 Wastewater Pump Station (WWPS) Improvements
Honolulu, O'ahu, TMK (1) 2-1-015:062

Dear Ms. Mākuanani:

Thank you for providing comments on the Draft EA for the Ala Moana No.1 WWPS Improvements Project. The project team reviewed the email dated May 26, 2026 and offers the following responses to the comments:

Historic and Archaeological Resources

The project team understands that the project is located within Makai Kaka'ako, an area significantly transformed by urbanization, and near historically sensitive areas, including burial grounds, historic properties, and potentially historic infrastructure. Consultation with the State Historic Preservation Division (SHPD) was initiated via the submittal of the *"Draft Archaeological Literature Review and Field Inspection of the Ala Moana No. 1 Wastewater Pump Station Improvements Project"* on April 28, 2026. The assigned Hawaii Cultural Resource Information System number is 2026PR00420. In a review letter issued by SHPD on May 22, 2026, they concurred with ENV's determination of "No historic properties affected", which ended the historic preservation review process. In the unlikely event that subsurface historic resources, such as human skeletal remains, structural remains, cultural deposits, artifacts, sand deposits, or sink holes are discovered during demolition and/or construction work, work will stop in the immediate area of the discovery and SHPD will be contacted.

Cultural Consultation

We understand that different methodologies are used to identify historic properties and cultural practices associated with cultural resources. Section 2.2 of the Final EA has been reorganized into two sections, including a new cultural resource analysis now provided in Section 2.3.

Additionally, in accordance with HRS Chapter 343 and the Environmental Review Program's *Guide to Implementation and Practice of the Hawaii Environmental Policy Act, 2012*, outreach to

community groups active in the area was conducted to ascertain additional ethnographic information on the cultural resources and practices in the area, and to seek references of individuals who may be able to provide such information. Consultation with the SHPD was initiated on April 28, 2026, and the Hawaiian Civic Club of Honolulu and the O'ahu Island Burial Council were contacted on June 2, 2026. Nā Kūpuna Makamae Center was not contacted, as the facility is no longer operational. Please refer to the above "Historic and Archaeology Resources" section for information regarding the SHPD consultation; the other groups contacted did not respond to the consultation request. Based on the review letter provided by SHPD and with no other information provided from nearby community groups, no significant impacts to cultural resources or practices in the area are anticipated.

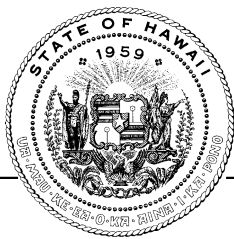
Thank you again for providing comments on the Draft EA.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Teper".

Aaron Teper, Planner
Townscape, Inc.

Cc: Audrey Uyema Pak (via email to: audrey.uyemapak@honolulu.gov)



**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/>

DTS 202605111545MO

Coastal Zone
Management
Program

June 3, 2026

Environmental Review
Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented
Development

Statewide Geographic
Information System

Statewide
Sustainability Branch

Mr. Aaron Teper
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawai'i 96813

Dear Mr. Teper:

Subject: Draft Environmental Assessment for the Fuel Storage Tank
Improvements at the Ala Moana No.1 Wastewater Pump Station,
Honolulu, Oahu; Tax Map Key: (1) 2-1-015: 062

The Office of Planning and Sustainable Development (OPSD) is in receipt of your review request, received May 11, 2026, on the Draft Environmental Assessment (EA), for the fuel storage tank improvements for the Ala Moana No.1 Wastewater Pump Station (WWPS).

As required by Hawai'i Administrative Rules (HAR) Chapter 11-280.1, all underground storage tanks and piping must have secondary containment and use interstitial monitoring to detect releases from tanks and piping by July 15, 2028. To avoid the failures of the outdated underground storage tank system, and to comply with current fuel storage regulations for environmental protection, the Department of Environmental Services, City and County of Honolulu, proposes to replace the existing underground fuel storage tank that serves Ala Moana No.1 WWPS with a new 10,000-gallon aboveground fuel storage tank. In addition, the project will replace the existing underground fuel piping, fuel monitoring panel, associated sensors, and connecting the new fuel monitoring panel to the supervisory control and data acquisition system.

The project will be executed in multiple phases with other WWPSs, with construction expected to start in April 2027 for 12 months. The estimated project valuation is \$1,487,000.

The OPSD has reviewed the Draft EA and has the following comments to offer:

1. OPSD acknowledges that the Draft EA has included an assessment with mitigation measures as to how the proposed project will conform to

Mr. Aaron Teper
June 3, 2026
Page 2

applicable coastal zone management objectives and policies set forth in
Hawai'i Revised Statutes (HRS) § 205A-2, as amended.

2. Pursuant to HRS § 206E-8.5, notwithstanding Chapter 205A, all requests for developments within a Special Management Area (SMA) and shoreline setback variances for developments on any lands within a community development district, for which a community development plan has been developed and approved in accordance with § 206E-5, shall be submitted to and reviewed by the lead agency as defined in Chapter 205A. The proposed project is located within the SMA of the Kaka'ako Community Development District, and the SMA use application for the subject project should be submitted to OPSD for review and approval.

If you respond to this comment letter, please include DTS 202605111545MO in the subject line. For any questions regarding this letter, please contact Shichao Li of our office at (808) 587-2841 or by email at shichao.li@hawaii.gov.

Sincerely,



Mary Alice Evans
Director



June 10, 2026

Director Mary Alice Evans
Office of Planning and Sustainable Development
P.O. Box 2359
Honolulu, HI 96804

Subject: Response to Comments on the Draft Environmental Assessment (EA)
Ala Moana No.1 Wastewater Pump Station (WWPS) Improvements
Honolulu, O'ahu, TMK (1) 2-1-015:062 ; DTS202605111545MO

Dear Ms. Evans:

Thank you for providing comments on the Draft EA. We have reviewed the letter dated Jun 3, 2026 from the Office of Planning and Sustainable Development (OPSD) and offer the following responses:

1. The project team appreciates OPSD's acknowledgment that the Draft EA has assessed the compliance of the proposed actions with the coastal zone management objectives and policies set forth in the Hawai'i Revised Statutes (HRS) Chapter 205A.
2. The project team acknowledges that the proposed actions are in the Special Management Area of the Kaka'ako Community Development District. Therefore, pursuant to HRS §206E-8.5 and in accordance with HRS §206E-5, we will submit the Special Management Area use application to OPSD for review and approval. Please refer to Section 3.5 of the Final EA for more information.

Sincerely,

Aaron Teper, Planner
Townscape, Inc.

Cc: Shichao Li (via email to: shichao.li@hawaii.gov)
Audrey Uyema Pak (via email to: audrey.uyemapak@honolulu.gov)

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF TRANSPORTATION | KA 'OIHANA ALAKAU
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

June 3, 2026

EDWIN H. SNIFFEN
DIRECTOR
KA LUNA HO'OKELE

Deputy Directors
Nā Hope Luna Ho'okele
DREANALEE K. KALILI
TAMMY L. LEE
CURT T. OTAGURO
ROBIN K. SHISHIDO

IN REPLY REFER TO

DIR0003970
STP 8.4101

VIA EMAIL: comments@townscapeinc.com

Mr. Aaron Teper
Environmental and Community Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Mr. Teper:

Subject: Draft Environmental Assessment (EA)
Fuel Storage Tank Improvements for the Ala Moana No. 1 Wastewater Pump
Station (WWPS)
Honolulu, Oahu, Hawaii
Tax Map Key: (1) 2-1-015: 062

Thank you for your letter, dated May 7, 2026, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject project. The HDOT understands that the City and County of Honolulu, Department of Environmental Services, is proposing to replace the existing underground fuel storage tank that serves Ala Moana No. 1 WWPS with a new 10,000-gallon aboveground fuel storage tank.

The HDOT's early consultation comments in letter STP 8.4017, dated January 2, 2026, remain valid and applicable to the proposed project. Please include a copy of the HDOT's comments and appropriate responses in the Final EA.

Please submit any subsequent land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at DOT.LandUse@hawaii.gov.

If there are any questions, please contact Mr. Blayne Nikaido, Planner, Land Use Section of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Sniffen".

EDWIN H. SNIFFEN
Director of Transportation



June 10, 2026

Director Edwin H. Sniffen
Hawai'i Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813

Subject: Response to Comments on the Draft Environmental Assessment (EA)
Ala Moana No.1 Wastewater Pump Station (WWPS) Improvements
Honolulu, O'ahu, TMK (1) 2-1-015:062

Dear Mr. Sniffen:

Thank you for the response letter, dated June 3, 2026, providing comments on the Draft EA for the Ala Moana No.1 WWPS Fuel Storage Tank Improvements project.

The project team has incorporated comments 1 through 3 received during the early consultation, dated January 2, 2026 into the Final EA. The following are responses to the earlier comments:

1. We have reviewed the applicable Technical Assistance Memorandum and determined that the proposed project will not attract hazardous wildlife, increase glint or glare, or create obstruction hazards exceeding 200 feet in height. Additionally, the proposed actions are limited to the property's footprint, and no changes to WWPS overall height are proposed. Therefore, no impacts to Honolulu International Airport (HNL) operations are expected, and no additional aviation related permits or review are expected.
2. The project team acknowledges that the project site is 16,619 feet from the end of Runway 26L at HNL. At this distance an FAA Form 7460-1, Notice of Proposed Construction or Alteration, would be required if project construction were to exceed approximately 166 feet. However, all construction activities, including staging and equipment required for replacing the existing underground fuel storage tank with an aboveground tank will remain below 166 feet. Accordingly, submission of the FAA Form 7460-1 is not required.
3. Sections 2.5.2 and 2.5.3 of the Final EA address the potential acoustic, odor, and air pollution impacts associated with the site's proximity to HNL.

Copies of HDOT's early consultation and Draft EA comments are available in Appendix B and C of the Final EA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Teper'.

Aaron Teper, Planner
Townscape, Inc.

Cc: Blayne Nikaido (via email to: blayne.h.nikaido@hawaii.gov)
Audrey Uyema Pak (via email to: audrey.uyemapak@honolulu.gov)

Aaron Teper

From: DOH.CABPASS <DOH.CABPASS@doh.hawaii.gov>
Sent: Tuesday, May 12, 2026 9:33 AM
To: Aaron Teper
Subject: CAB Comments: Fuel Storage Tank Improvements Ala Moana No.1 Wastewater Pump Station – Draft EA (AFNSI)

Follow Up Flag: Follow up
Flag Status: Flagged

Aloha Aaron Teper,
Townscape, Inc.,

Thank you for the opportunity to review the Ala Moana No.1 Wastewater Pump Station - Fuel Storage Tank Improvements Tax Map Key: 2-1-015: 062 Honolulu O'ahu-Draft EA (AFNSI) published in the May 8, 2026, edition of The Environmental Notice. Please visit the Clean Air Branch (CAB) website to download and reference our Standard Comments for Land Use Reviews. The link is provided below.

<https://health.hawaii.gov/cab/clean-air-branch/standard-comments-for-land-use-reviews/>

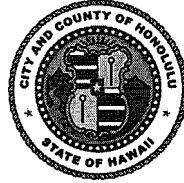
Lisa Kitahara
Planning & Administrative Support Staff Supervisor | Clean Air Branch
Hawai'i State Department of Health | Ka 'Oihana Olakino
Office: (808) 586-4200

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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 26, 2026

SENT VIA EMAIL

comments@townscapeinc.com
Mr. Aaron Teper

Dear Mr. Teper,

Subject: Notice of Availability for Review - Draft Environmental Assessment (EA)
Fuel Storage Tank Improvements Ala Moana No. 1 Wastewater
Pump Station - Honolulu, Island of O'ahu; Tax Map Key: 2-1-015:062

Thank you for the opportunity to review and comment. The Department of Design and Construction does not have any comments.

Should you have any questions, please call me at 808-768-8480.

Sincerely,

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

Haku Milles, P.E., LEED AP
Director

HM:cf (DDC-C2026-00179)

**DEPARTMENT OF FACILITY MAINTENANCE
KA 'OIHANA MĀLAMA HALE
CITY AND COUNTY OF HONOLULU**

1000 ULU'ŌHI'A STREET, SUITE 215, KAPOLEI, HAWAII 96707
PHONE: (808) 768-3343 • Fax: (808) 768-3381 • WEBSITE: honolulu.gov

RICK BLANGIARDI
MAYOR
MEIA



GENE C. ALBANO, P.E.
DIRECTOR AND CHIEF ENGINEER
PO'O A ME LUNA NUI 'ENEKINIA

WARREN K. MAMIZUKA
DEPUTY DIRECTOR
HOPE PO'O

IN REPLY REFER TO:
SWQ 26-186

June 16, 2026

Mr. Aaron Teper, Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawai'i 96813

Dear Mr. Teper:

SUBJECT: Review Draft Environmental Assessment (EA) for
Fuel Storage Tank Improvements for Ala Moana No.1
Wastewater Pump Station, TMK: (1) 2-1-015-062

Thank you for the opportunity to review and comment on the draft EA for Fuel Storage Tank Improvements for Ala Moana No. 1 Wastewater Pump Station project.

The Department of Facility Maintenance (DFM), Stormwater Quality Division (SWQ) is satisfied with the proposed measures to address erosion and sediment during construction viz, appropriate and properly implemented stormwater best management practices.

The SWQ is also satisfied that consideration has been given to implementing Low Impact Development Best Management Practices to further limit stormwater runoff from the site, if necessary.

We wish to clarify that the site is covered under the City and County of Honolulu's National Pollutant Discharge Elimination System (NPDES) Permit No. HIS000002 (Permit) and therefore all activity on the site is expected to comply with the requirements of the Permit. Additionally, there must be in place an approved Site-Specific Best Management Plan, which includes spill prevention and pollution control measures. Please note that this site does not meet the requirements for an NPDES General Permit, Appendix B for industrial activity and therefore a Stormwater Pollution Prevention Plan is not required as you indicated on p. 2-17 of the EA.

Mr. Aaron Teper, Planner
June 16, 2026
Page 2

In addition, as a reminder, the proposed improvements will also trigger complying with the requirements under 40 CFR Part 112 Oil Pollution Prevention due to the installation of any above-ground storage tanks that exceeds 1,320 gallons of oil and petroleum products that will require developing a Spill Prevention Control and Countermeasure (SPCC) plan. Therefore, it is recommended that the designer-of-record shall prepare a SPCC plan in advance prior to completion of construction and the plan be finalized and signed prior to when the facility is activated. The DFM-SWQ shall be notified when the SPCC plan has been drafted and given the opportunity to review and comment on the plan, as well as informed when construction is completed and the tanks are actively placed into service for the division's follow-up inspections and monitoring thereafter.

Should you have any questions, please contact Ms. Saani Fong, Planner VII of the SWQ by email at saani.fong@honolulu.gov or phone at (808) 768-3387.

Sincerely,



Digitally signed by
Albano, Gene
Date: 2026.06.16
16:50:12-10'00'

Gene C. Albano, P.E.
Director and Chief Engineer