November 12, 1993

Mr. Brian J. J. Choy, Director
Office of Environmental Quality Control
(EEQC)
220 S. King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Choy:

CHAPTER 343, HRS
Environmental Assessment/Determination
Negative Declaration

Recorded Owner:
Applicant:
Agent:
Location:
Tax Map Key:
Request:
Proposal:

: Ethan D. B. Abbott
: Belt Collins and Associates
: 1502 Mokulua Drive, Kailua, Oahu
: 4-5-3: 63
: Shoreline Setback Variance
: To allow (retain) a concrete rubble masonry seawall and retaining wall on the makai side of the property
: A Negative Declaration is Issued

Attached and incorporated by reference is the environmental assessment prepared by the applicant for the project. Based on the significance criteria outlined in Chapter 200, State Administrative Rules, we have determined that preparation of an Environmental Impact Statement is not required.

Approved
DONALD A. CLEGG
Director of Land Utilization

DAC:ak
Attachment
G:93sv7nd.djt
FINAL

ENVIRONMENTAL ASSESSMENT
SEAWALL RECONSTRUCTION
Lanikai, O'ahu, Hawai'i
Tax Map Key: 4-3-03:63

Prepared for:
Ethan D.B. and Jean D. Abbott

Prepared by:
Belt Collins & Associates

October 1993
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Repair and Modifications, Existing Damaged Seawall *(located in back pocket)*
1. GENERAL INFORMATION

Applicant: Ethan D.B. and Jean D. Abbott
2255 Nuna Street
Honolulu, Hawaii 96821

Recorded Fee Owner: Ethan D.B. and Jean D. Abbott
2255 Nuna Street
Honolulu, Hawaii 96821

Agent: Belt Collins & Associates

Tax Map Key: 4-3-03:63

Lot Area: 40,370 sq. ft.

Approving Agency: Department of Land Utilization, City & County of Honolulu

Agency Consulted in Making Assessment: Department of Land Utilization, City & County of Honolulu

Government Approval Sought: Seashore Setback Variance for after-the-fact reconstruction of retaining wall. This Environmental Assessment was prepared to accompany the application.

2. DESCRIPTION OF THE PROPOSED PROJECT

2.1 Location

The project area is located in Lanikai, a residential community on the windward coast of O'ahu between Kailua Beach and Waimanalo (Figure 1). The parcel owned by the applicants is situated next to an existing drainageway and extends from Mokulua Drive to the ocean (Figure 2).

2.2 General Description of the Project

The action covered by this assessment consisted of repairing an old washed-out retaining wall and the construction of three stone and concrete retaining wall segments on the makai edge of the aforementioned property. The repair to the old coral and rock seawall required filling holes and securing loose sections of the wall which had been broken up by storm waves. The structure consists of two parallel walls approximately 1 to 3 feet high and situated about 5 feet apart. The space in between the walls is covered with concrete to allow water that gets past the first wall to drain back into the ocean. The entire project area lies within the Shoreline Setback. This Environmental Assessment supports an after-the-fact application for a Shoreline Setback Variance.
2.3 Purpose of the Project

The beach at Lanikai has historically undergone cyclical erosion and accumulation periods spanning several decades. During the last few decades Lanikai residents have seen the sandy beach area along the shoreline gradually depleted, thus drastically reducing the distance between the boundaries of existing residential properties and the adjacent ocean. Whereas during accumulation periods the beach acts as a natural buffer between the residences and the ocean, ocean waters now extend all the way to the property edges during high tide (Figure 3). During periods of high or stormy seas, wave action has also been known to extend onto the properties, literally break over seawalls and wash onto and into structures.

Given the nearshore conditions along Lanikai and the potential impacts associated with stormy seas, the residents of Lanikai have over time erected retaining walls on the makai edges of their respective properties. The first retaining walls to appear in Lanikai were built during the last period of beach depletion, presumed to be in the 1930s. It was during this period that the first retaining wall was constructed on the applicants' property. Due to approximately sixty years of exposure to the nearshore conditions and periodic storm waves, this coral and rock wall gradually deteriorated to the point that it could no longer adequately fulfill its intended function (Figures 4). In January of 1993, a large section of the wall was washed out by stormy seas and the resulting wave action (Figure 5). Loose rocks from the wall were swept onto the applicants' property as the unimpeded waves spread onto the lanai and the surrounding lawn area (Figure 6). In addition, with each wave occurrence, dirt from the property was swept out to sea.

To prevent such an incident from happening again, the loose areas of the old seawall were repaired and secured while new retaining walls were constructed slightly set back from the old wall (Figure 7). The purpose of the new walls is to adequately protect the applicants' property from the nearshore conditions, to reduce the possibility of high seas depositing debris on the property, and to prevent portions of an ineffective wall from falling into the ocean.

The new walls are the only action proposed to satisfy the stated objective and therefore will have no cumulative impact on the area. Other than routine maintenance, there is no additional commitment or intention for further actions. Because the new walls have been situated adjacent to the old wall, this individual action does not infringe on the public benefit from or use of the environmental resources in the area, and has no impact on the existing environmental quality.

Neglecting to put up the new walls would result in substantial safety and economic hardship to the applicants as their property would be virtually unprotected from storm waves. The ragged condition of the old wall also presented certain safety hazards to people walking on or near the wall. In addition to making the whole structure safe to passersby, the new walls impede the progress of waves onto the applicants' property, prevent the continued deterioration and erosion of the near shore areas of the property, protect the lawn and other vegetation from being saturated by salt water, and prevent dirt from washing into the ocean.
Figure 4
VIEW OF DETERIORATED CONDITION
OF PREVIOUS RETAINING WALL

Ethan Abbott Property
Prepared by: Bolt Collins & Associates
October 1993
Figure 6
LANAI AND LAWN AREA COVERED BY ROCKS AND DEBRIS FROM PREVIOUS RETAINING WALL

Ethan Abbott Property
Prepared By: Bolt Collins & Associates
October 1993
Figure 7
VIEW OF NEW WALL

Ethan Abbott Property
Prepared By: Bolt Collins & Associates
October 1993
2.4 **Adjacent Land Uses**

Adjacent lots feature residential properties of comparable size with similar seawall structures. The majority of the retaining walls were constructed at a time when no official standards governed their form, resulting in a neighborhood of nonconforming retaining wall structures. Several of the neighboring walls extend out from their respective properties, into the shoreline and beach areas. The retaining walls addressed in this assessment are set back approximately four feet from the makai edge of the property.

2.5 **Government Plans, Regulations and Policies**

The subject parcel is located within the State Urban District. It is designated *Residential* in the Development Plan and R-10 on the Land Use Ordinance (LUC) map.

The wall reconstruction is generally consistent with the uses allowed in the above designations. The wall reconstruction, however, is within the shoreline setback area and requires a shoreline setback variance. The wall reconstruction is consistent with the intent of a shoreline setback variance, in that it would provide safer conditions for passersby, protect the applicants' property from wave damage, prevent deterioration and erosion of the property, and keep earth from going into the ocean.

The property is within the Special Management Area (SMA). The wall reconstruction, however, involves improvements to an existing single family residence that is not part of a larger development.

2.6 **Technical Characteristics**

The new retaining walls consist of the following structures:

1) Concrete-rock-masonry wall added on top of an existing seawall located at right/rear of the property approximately 1'-0" to 1'-6" in height and 21'-0" in length.

2) Concrete-rock-masonry wall added on top of an existing seawall located at the shoreline approximately 1'-0" to 3'-0" in height and 80'-0" in length.

3) Concrete-rock-masonry wall located approximately 9'-0" mauka of existing seawall at shoreline approximately 1'-0" to 2'-0" in height and 75'-0" in length.
3. ALTERNATIVES CONSIDERED

The only alternative to the construction of the retaining walls is no action. In this case, that would require tearing down the new retaining walls that have already been constructed. The absence of sufficient protection from the nearshore elements would result in substantial hardship for the applicants as it would lead to continued deterioration of the old wall as well as periodic saturation and erosion of the property due to stormy sea conditions. The damage resulting from these circumstances would bring about a continued decline in the applicants' property value. In addition, earth debris from the property would be carried into the ocean where it could adversely affect the marine environment.

4. ENVIRONMENTAL CHARACTERISTICS AND POTENTIAL IMPACTS

4.1 Physical Environment

4.1.1 Topography

The nearshore area around Lanikai is generally flat. The land begins to rise gradually approximately one-quarter of a mile from the shoreline and then rises quickly to the top of a hill.

The project parcel is flat, oceanfront land extending from Mokulua Drive to the retaining walls at the makai edge of the property. The beach area lies approximately five feet below the edge of the old retaining wall.

The construction of the retaining walls had no impact on the topography of the property or the area.

4.1.2 Soils

The Lanikai area is classified by the United States Soil Conservation Service as being in the Kaena-Waialua Association. This soil type is characterized by fine grain soils with fine to coarse textured subsoils and underlying materials.

The surface soil on the project parcel is jaucus sand, a soil commonly found in the area where slopes are between 0 and 15 percent. Jaucus sand is predominantly single grain, pale brown to very pale brown, and more than six inches deep. The soil tends to be moderately alkaline and features rapid permeability, keeping surface runoff to a minimum.

The new retaining walls have no adverse impact on the soils of the project parcel. Areas of loose soil which had previously been exposed to storm wave action are now protected so that they may be used for planting and not wash off into the ocean.
4.1.3 Hydrology and Drainage

As mentioned earlier, the project site is located adjacent to an existing drainageway and the soils on the project parcel feature excellent drainage capabilities. According to the Flood Insurance Rate Maps (FIRM), the site lies within a special flood hazard area designated as Zone AE, with base flood elevations determined up to an elevation of 5 feet. The construction of retaining walls in a flood hazard area is exempted from the provisions outlined under Article 11, Flood Hazard Districts, § 21-11.15 of the Revised Ordinances of Honolulu.

4.2 Terrestrial Biota

4.2.1 Flora

The residential nature of Lanikai has displaced most of the native vegetation previously found in the area. Wild plant species found throughout the area include haole koa, California grass, and Christmas berry trees. Other ornamental species are found as part of the various landscaped yards of residents.

The vegetation around the project area consists of coconut trees, a hala tree, several naupaka plants, and yard grass. All species of flora thrive on fresh water. No endangered or rare species are known to exist on or around the site.

The new retaining wall has had no adverse impact to the existing vegetation. The structure has in fact helped preserve the vegetation by reducing the exposure to salt water and lessening the effects of soil erosion caused by wave action.

4.2.2 Fauna

Animal species around Lanikai include several common introduced birds such as myna, barred dove, and spotted dove, and mammals such as mongoose, rats, and feral cats and dogs.

No endangered animal species are known to exist on or around the project parcel. The new seawall has no effect on the fauna populations of Lanikai, O'ahu, or Hawai'i.

4.3 Marine Environment

The marine environment in the area immediately off the reconstructed seawall consists of a sandy beach and several coral outcroppings which are covered by water or exposed, depending on the tides. Fish are fairly scarce in this area due to the lack of suitable habitats caused by the constant wave action and shifting sands. The only endangered species to inhabit the area around Lanikai is the green sea turtle (Chelonia mydas). This species receives federal protection under the Endangered Species Act and can be found towards the outer edge of the shallow barrier reef located off Lanikai Beach.
The new seawall has no adverse impact on the marine environment. On the contrary, reducing the amount of earth and debris washed into the ocean from the applicants' yard will help maintain the quality of this area.

4.4 Historic and Archaeological Features

The area around Lanikai consists almost entirely of single-family residential properties situated on comparably sized lots. Very few areas remain undisturbed by the lots, roads, or other infrastructural elements. Any archaeological features which may have existed in the area have long since been covered or disturbed. Historic features are primarily limited to older houses as they comprise the majority of remaining structures in the area.

The project site has no archaeological features within its boundaries or in its general vicinity. The house itself may be considered historically significant as it was built over 50 years ago, but no other historic features appear on the property. The new retaining walls will have no negative impact on historic or archaeological resources and will in fact protect the house from potential hazards associated with the nearshore conditions.

4.5 Visual Attributes

Views from the residences along Lanikai Beach out towards the surrounding ocean and Mokulua Islands remain one of the important attributes of this community. Accordingly, views of this area from other parts of the island are also considered with respect to construction activities.

A tiered construction form was used for the new retaining walls to minimize the heights of the walls and to reduce any obstruction of views. The new walls are consistent with similar nonconforming wall structures found on adjacent properties and present a more aesthetically pleasing view of the makai portion of the property than the previous deteriorated wall.

4.6 Air Quality

Air quality around the Lanikai community is generally excellent due to the constant tradewinds and low traffic volume.

Increased amounts of dust may have been generated in the short term from construction activities. However, given the small scale of this project, air quality impacts were negligible. The new landscaping associated with the reconstructed seawall will reduce the amount of loose soil and subsequent wind erosion previously occurring on the site. Overall, long term air quality around the site will remain fairly constant if not improve.

4.7 Water Quality

Water quality in the Lanikai area will not be adversely impacted by the construction or existence of the new retaining wall.
4.8 Noise

Noise generated by the construction of the new retaining wall was temporary and confined to the shoreline area. No additional noise impacts will occur as a result of the new retaining wall.

4.9 Socioeconomic

The community of Lanikai is a residential area with very little commercial activity. Large-scale construction ceased over twenty years ago and no other revenue generating industry has since located in the vicinity.

The construction of the new retaining walls was a short-term project completed over a period of 2 days. No new jobs were created and the amount of income, revenues, and demand on public services was negligible so as to have no impact on the socioeconomic setting of the area.

5. MITIGATION MEASURES

Because no significant impacts have been determined in association with this project, no mitigation measures will be needed.

6. DETERMINATION OF SIGNIFICANCE

The criteria to determine the significance of any type of development action are outlined in the Department of Health Environmental Impact Rules (§ 11-200-12). In addressing these criteria for the construction of the subject retaining walls, it has been determined that construction of these walls did not: 1) involve an irrevocable commitment to loss or destruction of any natural or cultural resource; 2) curtail the range of beneficial uses of the environment; 3) conflict with the state's long-term environmental policies or goals and Hawaii Revised Statutes, and any revisions thereof and amendments thereto, court decisions or executive orders; 4) substantially affect the economic or social welfare of the community or State; 5) substantially affect public health; 6) involve substantial secondary impacts, such as population changes or effects on public facilities; 7) involve a substantial degradation of environmental quality; 8) have a cumulatively considerable effect upon the environment or involve a commitment for larger actions; 9) substantially affect a rare, threatened, or endangered species, or its habitat; 10) detrimentally affect air or water quality or ambient noise levels; or 11) affect an environmentally sensitive area such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

Given the absence of any of the aforementioned conditions, it can be determined that the subject action does not create any significant impacts on the environment.
7. COMMENT AND RESPONSE LETTERS

On the following pages are (1) comment letters to the published Environmental Assessment, and (2) response letters from the applicant to the comments. The last two letters had no comments and therefore required no response.
September 16, 1993

The Honorable Donald A. Clegg  
Director  
Department of Land Utilization  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Subject: Environmental Assessment for After-the-Fact Shoreline Setback  
Variance for Ethan D.B. Abbott Seawall Reconstruction  
[93/SV-007(DT)]

The proposed project involves repair and expansion of an existing seawall fronting a lot in Lanikai. The existing structure is a nonconforming structure built prior to the enactment of the shoreline setback provisions. The repaired and expanded wall is planned to consist of two parallel walls about five feet apart with the space between the walls covered with concrete. The slope of the seaward face of the seawall appears to be near-vertical.

It is a CZM policy to protect beaches for public use and recreation. From a beach management perspective, removal of the nonconforming structure to allow free movement of the shoreline is preferable. However, if it is determined that a shoreline stabilization structure is appropriate for this area, we suggest that a shallow sloping revetment rather than a near-vertical seawall be required. Waves hitting shoreline stabilization structures can result in turbulence which may scour sand fronting the structure. Gentle slopes may allow for more of the wave energy to dissipate on the structure, thereby decreasing the turbulence reaching the fronting beach and reducing the erosion of sand.

Thank you for the opportunity to comment. If you have any questions or require further information, please contact Valerie McMillan of our CZM Program at 587-2877.

Sincerely,

[Signature]

Harold S. Masumoto  
Director
Mr. Harold S. Masumoto, Director
Office of State Planning
P. O. Box 3540
Honolulu, Hawaii 96811-3540

Dear Mr. Masumoto:

After-the-Fact Application for Shoreline Setback Variance
Abbott Seawall Reconstruction, Lanikai, Oahu, Hawaii, TMK 4-3-03-63

This is in response to your September 16, 1993 letter to Department of Land Utilization Director Donald Clegg concerning the environmental assessment prepared in support of the above application.

We are cognizant of CZM’s policy of protecting beaches for public use and recreation. Thank you for your suggestions on the appropriate type of construction for the seawall. We would like to point out, however, that the request is for an after-the-fact variance for reconstruction that has already occurred.

We note your concern for the fronting beach and the desire to reduce erosion of sand. A review of the figures in the assessment will show that the reconstructed wall does not abut a sand beach. Rather, it sits atop a rock mass that is typical of the project area and environs.

Thank you for your comments.

Sincerely,

BELT COLLINS HAWAII

Anne L. Mapes

cc: Donald A. Clegg
    Ethan D. B. Abbott
Mr. Donald Clegg  
Director of Land Utilization  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii  

Attention: Ms. Dana Teramoto

Dear Mr. Clegg:

Subject: Draft Environmental Assessment for the Ethan Abbott Seawall Reconstruction, Lanikai, Oahu

Thank you for the opportunity to review the subject document. We have the following comment.

Please consult with the following agencies:

a) U.S. Army Corps of Engineers;  
b) State of Hawaii, Department of Land and Natural Resources;  
c) Office of State Planning, Coastal Zone Management Program.

If you have any questions, please call Jeyan Thirugnanam at 586-4185.

Sincerely,

Brian J. J. Choy  
Director

c: Ethan Abbott  
Belt Collins and Associates
October 7, 1993
93P-664/333.2700

Mr. Brian J. J. Choy, Director
State of Hawaii
Office of Environmental Quality Control
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Mr. Choy:

After-the-Fact Application for Shoreline Setback Variance
Abbott Seawall Reconstruction, Lanikai, Oahu, Hawaii, TMK 4-3-03-63

This is in response to your August 24, 1993 letter to Department of Land Utilization (DLU) Director Donald Clegg concerning the environmental assessment prepared in support of the above application.

We understand that DLU staff has consulted with the agencies you suggested in your letter. We have received comments from the Office of State Planning, Coastal Zone Management Program as well as from the U.S. Army Corps of Engineers. These letters and my responses to them will be appended to the final environmental assessment.

Thank you for commenting.

Sincerely,

BELT COLLINS HAWAII

Anne L. Mapes

cc: Donald A. Clegg
    Ethan D. B. Abbott
August 12, 1993

Operations Division

SUBJECT: Ethan D.B. Abbott Seawall Reconstruction, 1502 Mokulau Drive, Lanikai, Hawaii, TMK: 4-3-3:63 and 4-3-3:64

Mr. Donald A. Clegg
Director of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

This is in response to your letter dated July 19, 1993, regarding the subject project.

Based on the information provided, the seawall has already been reconstructed. The reconstructed seawall was built on an existing seawall set back approximately six inches to two feet from the front face of the existing seawall. No work occurred within waters of the United States. Therefore, no Department of the Army permit is required.

Thank you for the opportunity to review and comment on the subject project. If you have any questions, please contact Ms. Suzanne Baba, Operations Division, at 438-9258.

Sincerely,

Warren Freund
Chief, Operations Division
Mr. Michael T. Lee  
Chief, Operations Division  
Department of the Army  
U. S. Army Engineer District, Honolulu  
Fort Shafter, Hawaii 96858-5440  

Dear Mr. Lee:

After-the-Fact Application for Shoreline Setback Variance  
Abbott Seawall Reconstruction, Lanikai, Oahu, Hawaii, TMK 4-3-03:63

This is in response to your August 12, 1993 letter to Department of Land Utilization (DLU) Director Donald Clegg concerning the environmental assessment prepared in support of the above application.

Thank you for confirming that a Department of the Army permit is not required for the project since work occurred outside waters of the United States.

Sincerely,

BELT COLLINS HAWAII

Anne L. Mapes

cc: Donald A. Clegg  
    Ethan D. B. Abbott
August 10, 1993

TO: DONALD A. CLEGG, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: WALTER M. OZAWA, DIRECTOR

SUBJECT: ENVIRONMENTAL ASSESSMENT FOR ETHAN D. B. ABBOT SEAWALL
RECONSTRUCTION IN LANIKAI, OAHU
PROJ. REF. NO. 93/SV-7(DT)

We have reviewed the environmental assessment and made a site investigation during mid-tide to assess the impact of the project on the lateral access along Lanikai shoreline.

The project is located to the north of a small, white sand beach with a public right-of-way which is used by swimmers and kayakers. At present, there is no lateral access to the north or south of the right-of-way since the neighboring residential properties, including the Abbot’s, have pre-1970 seawalls which are pounded by the waves. A beachgoer reported that even at low tide, lateral movement is dangerous.

Recreationally, the white sand beaches of Lanikai are a precious resource. They are also environmentally sensitive features prone to erosion. Although no reconstruction of the seawall has been done in this case, any future construction should be done with the twin goals of reversing the sand erosion and improving lateral access along the shoreline. A coastal engineer should provide professional recommendations for achieving these goals. We wonder if the neighbors could be committed to future participation in meeting these goals if government initiates an "improvement district" type of project.

We offer no objections to the top-of-the wall modifications reviewed in this case, and we do not feel this project warrants an environmental impact statement.
Donald A. Clegg  
Page 2  
August 10, 1993

Thank you for providing us with the opportunity to comment on this environmental assessment.

Should you have any questions, please call Bob Bevacqua of our Advance Planning Branch at extension 6316.

for WALTER M. OZAWA, Director

WMO:ei
October 7, 1993
93P-665/333.2700

Mr. Walter M. Ozawa, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Ozawa:

After-the-Fact Application for Shoreline Setback Variance
Abbott Seawall Reconstruction, Lanikai, Oahu, Hawaii, TMK 4-3-03-63

This is in response to your August 10, 1993 letter to Department of Land Utilization (DLU) Director Donald Clegg concerning the environmental assessment prepared in support of the above application.

Thank you for your comments on the above project. Your suggestions for communal participation in an effort to minimize sand erosion and improve lateral access along the shoreline in Lanikai have been passed on to the applicant.

Sincerely,

BELT COLLINS HAWAII

Anne L. Mapes

cc: Donald A. Clegg
    Ethan D. B. Abbott
MEMORANDUM

TO: DONALD A. CLEGG, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: C. MICHAEL STREET, DIRECTOR AND CHIEF ENGINEER

SUBJECT: ENVIRONMENTAL ASSESSMENT (EA)
ETHAN D. B. ABBOTT SEAWALL RECONSTRUCTION
TMK: 4-3-3; 63

We have reviewed the subject EA and have the following comments:

1. The EA should address the potential impact of storm water discharge associated with the construction activities on water quality of the receiving waters.

2. The EA should also state what structural or non-structural best management practices (BMP) will be provided to control and reduce discharge of pollutants resulting from construction activities.

3. If dewatering activity is anticipated during construction, dewatering permits will be required by the State Department of Health as well as the City Department of Public Works.

Should you have any questions, please contact Mr. Alex Ho, Environmental Engineer, at 523-4150.

C. Michael Street
Director and Chief Engineer
October 8, 1993
93P-666/333.2700

Mr. Felix Limtiaco, Deputy Director
Department of Public Works
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Limtiaco:

After-the-Fact Application for Shoreline Setback Variance
Abbott Seawall Reconstruction, Lanikai, Oahu, Hawaii, TMK 4-3-03:63

This is in response to Mr. Michael Street's July 20, 1993 letter to Department of Land Utilization (DLU) Director Donald Clegg concerning the environmental assessment prepared in support of the above application.

1. The applicant has submitted an after-the-fact application for reconstruction that has taken place and been completed. To the applicant's knowledge, there was no storm water discharge associated with the construction activities and hence no impact to receiving waters.

2. As stated above, construction activities are complete and no discharge of pollutants was observed.

3. No dewatering activities took place during construction.

Sincerely,

BELT COLLINS HAWAII

Anne L. Mapes

cc: Donald A. Clegg
    Ethan D. B. Abbott
TO: DONALD A. CLEGG, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: KAZU HAYASHIDA, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR MEMORANDUM OF JULY 19, 1993 ON THE ENVIRONMENTAL ASSESSMENT (EA) FOR THE SEAWALL RECONSTRUCTION AT THE ETHAN D.B. ABBOTT PROPERTY AT LANIKAI, OAHU, TMK: 4-3-3: 63

August 5, 1993

Thank you for the opportunity to review and comment on the after-the-fact EA for the reconstructed and improved seawall.

We have no objections to the subject project.

If you have any questions, please contact Roy Doi at 527-5235.
August 17, 1993

Mr. Donald A. Clegg, Director
Department of Land Utilization
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Subject: After-the-Fact Environmental Assessment (93/SV-7)
Ethan Abbott Seawall Reconstruction
1502 Mokulua Drive
Lanikai, Oahu
TNK: 4-3-3: 63

Thank you for allowing us to review and comment on the subject document. We do not have any comments to offer on this after-the-fact reconstruction.

Very truly yours,

[Signature]

JOHN C. LEWIN, M.D.
Director of Health
OVERSIZED DRAWING/MAP

PLEASE SEE 35MM ROLL

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