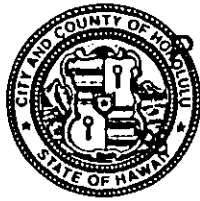


Public Baths Wastewater Pump
Stations Modification at
Kapiolani Park (Queen's
Surf Beach)

DEPARTMENT OF ENVIRONMENTAL SERVICES
~~DEPARTMENT OF WASTEWATER MANAGEMENT~~
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



RECEIVED

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REC. OF ENVIRONMENTAL QUALITY CONTROL
July 21, 1998

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR

CHERYL K. OKUMA-SEPE, ESQ.
DEPUTY DIRECTOR

DCP 98-53

Mr. Gary Gill, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Notice of Determination - Finding of No Significant Impact (FONSI)
for Public Baths Wastewater Pump Station Modification
Honolulu, Oahu, Hawaii
TMK: 3-1-31:7

The City and County of Honolulu, Department of Environmental Services (EVN) (formerly the Department of Wastewater Management) has reviewed and responded to comments related to the draft environmental assessment received during the 30-day public comment period which began on August 8, 1997. EVN has determined that this project will not have significant environmental effects and has issued a Finding of No Significant Impact. Please publish this notice in the August 8, 1998 edition of *The Environmental Notice*. ✓

We have enclosed the following items for your review:

- (1) One copy of the OEQC Bulletin Publication Form with project summary on computer disk;
- (2) Four copies of the Final EA;
- (3) One copy of the proposed distribution list; and
- (4) One copy of the "Letter to Participants".

The following information is provided in accordance with the requirements for a Notice of Determination:

Identification of Proposing Agency

City and County of Honolulu Department of Environmental Services (formerly the Department of Wastewater Management)

84

Identification of Approving Agency

N/A

Brief Description of Proposed Action

The proposed project is renovation of the Public Baths Wastewater Pump Station to increase pumping capacity and to upgrade its mechanical, electrical and structural reliability. Specific tasks include: replacement of 7.5 and 10 hp pumps with larger 15 hp pumps; connection of the pump house building and emergency generator building to increase interior floor area; and addition of low impact acoustical treatments for the emergency generator room. A 20-foot wide easement within the neighboring park will be obtained from the Department of Land and Natural Resources for installation of underground equipment to serve the pump station.

Determination

Finding of No Significant Impact (FONSI)

Reasons Supporting Determination

This determination is based on the significance criteria listed in Section 11-200-12 of the Environmental Impact Statement Rules:

- (1) The proposed project will not involve an irrevocable commitment to loss or destruction of any natural or cultural resource. There will be no loss of park land; however, an easement will be requested for appurtenant facilities to be constructed underground within the park.
- (2) The proposed project will not curtail the range of beneficial uses of the environment. The proposed improvements will be constructed within an existing pump station site. Those improvements constructed outside of the property will be constructed underground and will not curtail the existing park uses.
- (3) The proposed project will not conflict with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders.
- (4) The proposed project will not have a substantial negative effect on the economic or social welfare of the community or state. Rather, the impact of the project on the community will be positive in that wastewater transmission will be improved.
- (5) The proposed project will not substantially affect public health. Rather, the proposed improvements are an effort to improve reliability of the pump station, resulting in an improvement to protect public health.

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Mr. Gary Gill
Page 3
July 21, 1998

- (6) The proposed project will not involve substantial secondary impacts such as population changes or negative effects on public facilities. The proposed improvements were programmed to improve the regional wastewater infrastructure.
- (7) The proposed project will not involve a substantial degradation of environmental quality. The project will instead work to protect environmental quality by improving the pump station reliability and minimizing the potential for spills and malfunction.
- (8) The proposed project will not have a considerable cumulative effect upon the environment or involve a commitment for larger actions. The project is one phase of improvements addressed in the *East Mamala Bay Wastewater Facilities Plan Final EIS*. The cumulative impact of this "larger action" has been previously addressed.
- (9) The proposed project will not have a substantial effect on any rare, threatened, or endangered species or its habitat since there are no species or habitat of this nature present within the site.
- (10) The proposed project will not cause long-term detrimental effects on air or water quality or ambient noise levels. Rather, the proposed modifications to the pump station will improve existing conditions. Noise abatement measures will be installed. Rehabilitation of the existing aged facilities will reduce the potential for equipment failure which may result in air or water quality impacts.
- (11) The project site is located within a tsunami evacuation area. However, the proposed project includes installation of submersible pumps which are unlikely to suffer damage should flooding occur.
- (12) The proposed project will not substantially affect scenic vistas and view planes identified in county or state plans or studies. Connection of the two buildings and the generator building expansion will not impact views of the coastline or Kapiolani Park.
- (13) The proposed project will not require substantial energy consumption. Existing pumps are of 7.5 or 10 hp capacity. Proposed pumps will each have a 15 hp capacity. The relatively small size pumps will not require a substantial increase in energy.

Should you have any questions, please contact Mr. Sung Ho Lai of the Department of Design and Construction, Division of Planning and Programming at 527-5398.

Sincerely,



KENNETH E. SPRAGUE
Director

cc: Kenneth Ishizaki, Engineering Concepts, Inc.

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1998-08-08-0A-FEA-Public Baths
Wastewater Pump Station Modification
at Kapiolani Park

AUG 8 1998

FILE COPY

Final Environmental Assessment

**PUBLIC BATHS WASTEWATER
PUMP STATION MODIFICATION**

Honolulu, Oahu, Hawaii
TMK: 3-1-31:07



ENGINEERING CONCEPTS, INC.

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Final Environmental Assessment
**PUBLIC BATHS WASTEWATER
PUMP STATION MODIFICATION**

Honolulu, Oahu, Hawaii
TMK: 3-1-31:07

*This environmental document has been prepared pursuant to
Chapter 343, Hawaii Revised Statutes*

Proposing Agency:

DEPARTMENT OF ENVIRONMENTAL SERVICES
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Responsible Official:


Kenneth E. Sprague, Director


Date

Prepared by:

ENGINEERING CONCEPTS, INC.
250 Ward Avenue, Suite 206
Honolulu, Hawaii 96814

JULY 1998

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CHAPTER 1

INTRODUCTION AND SUMMARY

1.1 PURPOSE OF THIS DOCUMENT

The purpose of this Final Environmental Assessment (EA) is to present potential environmental impacts associated with construction and operation of proposed modifications to the City and County of Honolulu's Public Baths Wastewater Pump Station (WWPS). This document was prepared following a period of public review of a Draft EA. Public comments and applicant responses have been incorporated in this document.

This Final EA has been prepared in accordance with Chapter 343, Hawaii Revised Statutes (HRS). The City and County of Honolulu Department of Environmental Services (ENV), formerly the Department of Wastewater Management, is the proposing agency for this document. Mr. Sung Ho Lai (527-5398) at the Department of Design and Construction, Division of Planning and Programming is the point of contact for the project.

This Final EA will be submitted to the City and County of Honolulu Department of Planning and Permitting in support of Special Management Area and Diamond Head Special District permit applications.

1.2 PROJECT BACKGROUND

The Public Baths WWPS was one of 16 municipal wastewater pump stations evaluated in the *East Mamala Bay Final Wastewater Facilities Plan* (December 1993). Using flow modeling, the facilities plan identified the Public Baths WWPS and force main as having inadequate capacity to handle existing and future projected wastewater flows. To remedy the situation, ENV has proposed modification of the pump station to increase reliability and pumping capacity, and replacement of the existing 12-inch force main.

The force main replacement project will precede the pump station modification. The environmental impacts associated with the force main replacement have been addressed in the *Public Baths Force Main Replacement Final Environmental Assessment* (March 1996). The cumulative impacts associated with all future municipal wastewater collection, treatment and disposal system associated with the Sand Island Wastewater Treatment Plant tributary area were addressed in the *East Mamala Bay Wastewater Facilities Plan Final Environmental Impact Statement* dated December 1993.

1.3 PROJECT OBJECTIVES

The objectives of this project are to increase the pumping capacity and overall reliability of the existing Public Baths WWPS in conformance with ENV operating standards. These objectives may be achieved by construction of structural, mechanical and electrical modifications to the existing facility.

1.4 PROJECT AND SITE DESCRIPTION

The Public Baths WWPS (TMK: 3-1-31:07) is located in Waikiki on the makai side of Kalakaua Avenue across from Kapiolani Park. The Waikiki Aquarium and the City and County of Honolulu Public Baths Beach Park are adjacent to the project site.

1.5 SUMMARY OF POTENTIAL IMPACTS AND MITIGATION MEASURES

Character of the Area

The project will not incite development or result in social or economic changes which will impact the character of the area.

Easement for Underground Facilities

An easement approximately 20 feet wide will be needed for pump station equipment and appurtenances to be constructed below grade within the adjacent park.

Special Management Area

The ENV will apply for a Special Management Area Use permit and comply with the permit conditions.

Diamond Head Special District

The ENV will apply for a minor special district permit and comply with the permit conditions.

Flora

The project will not impact trees within the adjacent park.

Air Quality

The generation of fugitive dust during construction will be mitigated by implementation of appropriate best management practices and compliance with DOH regulations. Operation of the emergency generator (less than 500 hours per year) is exempt from permitting requirements under Hawaii Administrative Rules Title 11, Chapter 60.1 "Air Pollution Control".

Noise

Short-term impacts may result from construction activities. The contractor will be required to comply with all applicable State and City and County noise regulations. In the long-term, the pump station modifications will include noise abatement features to reduce the noise levels at the property line due to operation of the emergency generator.

Archaeology/Historic Sites

An archaeological monitoring plan will be prepared during design of the pump station modifications, and excavations will be monitored during construction.

Aesthetics

The pump station structural modifications will incorporate materials, finishes, and colors that are non-reflective and subdued in nature, in conformance with design controls of the Diamond Head Special District. The proposed improvements will not impair view planes or corridors from public vantage points.

Traffic

Traffic impacts may result in the short-term, due to construction vehicles entering and exiting the project site. No long-term traffic impacts are anticipated as a result of the pump station modification.

Park/Park Users

Short-term impacts to the neighboring park and its users include temporary use of park lands for various construction-related activities, including: contractor's field office, material storage/staging area, treatment and/or disposal of dewatering effluent, and vehicle parking. Use of park lands will be coordinated with the Department of Parks and Recreation (user), the Department of Land and Natural Resources (land owner), and the Kapiolani Park Preservation Society. In the long-term, the proposed project will included an easement (approximately 20 feet wide) within park land for below ground expansion of the WWPS facilities.

1.6 PERMITS AND APPROVALS REQUIRED

Permits and approvals which will be required for construction of the pump station modifications are listed below. No federal permits or approvals are anticipated.

State of Hawaii

Department of Health:

- NPDES Permit for Construction Dewatering
- NPDES Permit for Hydrotesting
- Construction plan approval
- Construction compliance with HAR 11-42, 11-43, 11-60.1, and 11-62

Department of Land and Natural Resources:

- Archaeological Monitoring Plan
- Easement within park for underground facilities

City and County of Honolulu

Department of Planning and Permitting

- Building Permit
- Sign Permit
- Special Management Area Use Permit
- Diamond Head Special District Minor Permit
- Construction plan approval
- Waiver of development or design standards
- Grubbing/Grading Permit

Department of Transportation Services:

- Street Usage Permit
- Construction plan approval

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CHAPTER 2

PROJECT DESCRIPTION

2.1 EXISTING CONDITIONS AND NEED FOR THE PROJECT

2.1.1 Existing Conditions

The Public Baths WWPS is equipped with three constant speed pumps to handle the range of tributary flow rates emanating during dry and wet weather conditions. Two pumps are 10 hp horizontal centrifugal pumps, each with a rated capacity of 875 gpm (1.25 hp) at 19 ft TDH. The third pump, installed as a replacement in 1996, is a 7.5 hp submersible pump with rated output of 600 gpm (0.8 mgd) at 19 ft TDH.

The original design capacity of the pump station was 2.1 mgd. However, a pump station capacity test conducted in September 1996 determined that 1.05 mgd could be conveyed with one pump and 1.6 mgd could be conveyed by two pumps in operation. The third pump does not contribute appreciably to firm pumping capacity and is operated solely as a standby unit.

2.1.2 Need for the Project

The need to increase capacity of the Public Baths WWPS has been anticipated for several reasons:

- To accommodate future domestic wastewater flows from residential areas along Diamond Head Road and Makalei Place that are presently unsewered;
- To accommodate future domestic wastewater flows due to development of vacant lots;
- To accommodate increases in non-domestic wastewater flows generated by the Honolulu Zoo and Waikiki Aquarium; and
- To accommodate additional flows due to infiltration and inflow into the sewer collection system.

The proposed modification of the Public Baths WWPS will meet the following objectives:

- Pump station capacity will be increased to meet the future peak design flow of 3.2 mgd. (In comparison, a pump station capacity test conducted in

September 1996 determined that approximately 1.6 mgd could be conveyed with operation of two existing pumps.);

- Pump station reliability will be upgraded in conformance with the *Design Standards of the Department of Wastewater Management*; and
- Noise levels associated with operation of the emergency generator will be reduced at the property line from 75 to 82 dBA under existing conditions to approximately 60 dBA after construction of sound abatement modifications.

2.2 PROJECT SITE

The Public Baths WWPS, originally constructed in 1944, occupies a 3,599 sq. ft. lot located on the makai side of Kalakaua Avenue across from Kapiolani Park. Neighboring parcels house the Waikiki Aquarium and the Public Baths Beach Park (see Figures 2.1 and 2.2).

The pump station service area encompasses about 250 acres, from the slopes of Diamond Head to Monsarrat Avenue (including a portion of the Honolulu Zoo) and approximately 2,000 feet mauka of Kalakaua Avenue (see Figure 2.3). Wastewater is comprised of domestic wastes from residential and commercial developments and non-domestic (animal-related) wastes from the Honolulu Zoo and Waikiki Aquarium.

The associated 12-inch diameter force main discharges to a manhole near the intersection of Kalakaua Avenue and Kapahulu Avenue. However, a new 16-inch diameter force main is presently under construction and will replace the existing 12-inch pipe. Refer to Figure 2.4 for the 12-inch and 16-inch force main alignments.

2.3 PROPOSED ACTION

The proposed action is to modify the existing pump station to meet the project objectives listed above. Specific tasks include:

- Replacement of the existing 7.5 hp and 10 hp pumps with larger capacity, 15 hp submersible pumps to be used in a dry well application;
- Replacement of the existing, worn suction and discharge piping with larger piping which corresponds to the new pumps;
- Replacement of the existing flow meter and housing;

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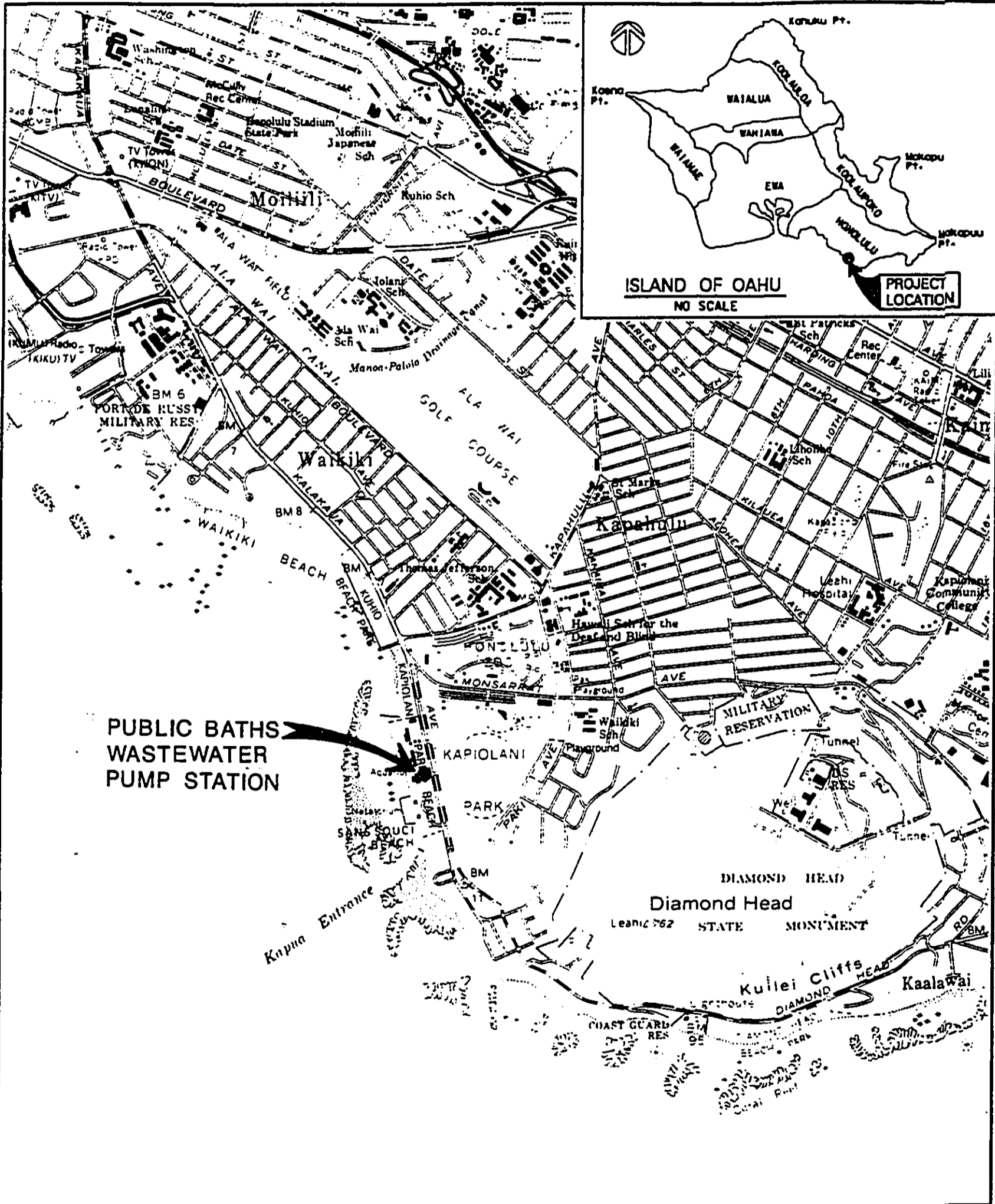
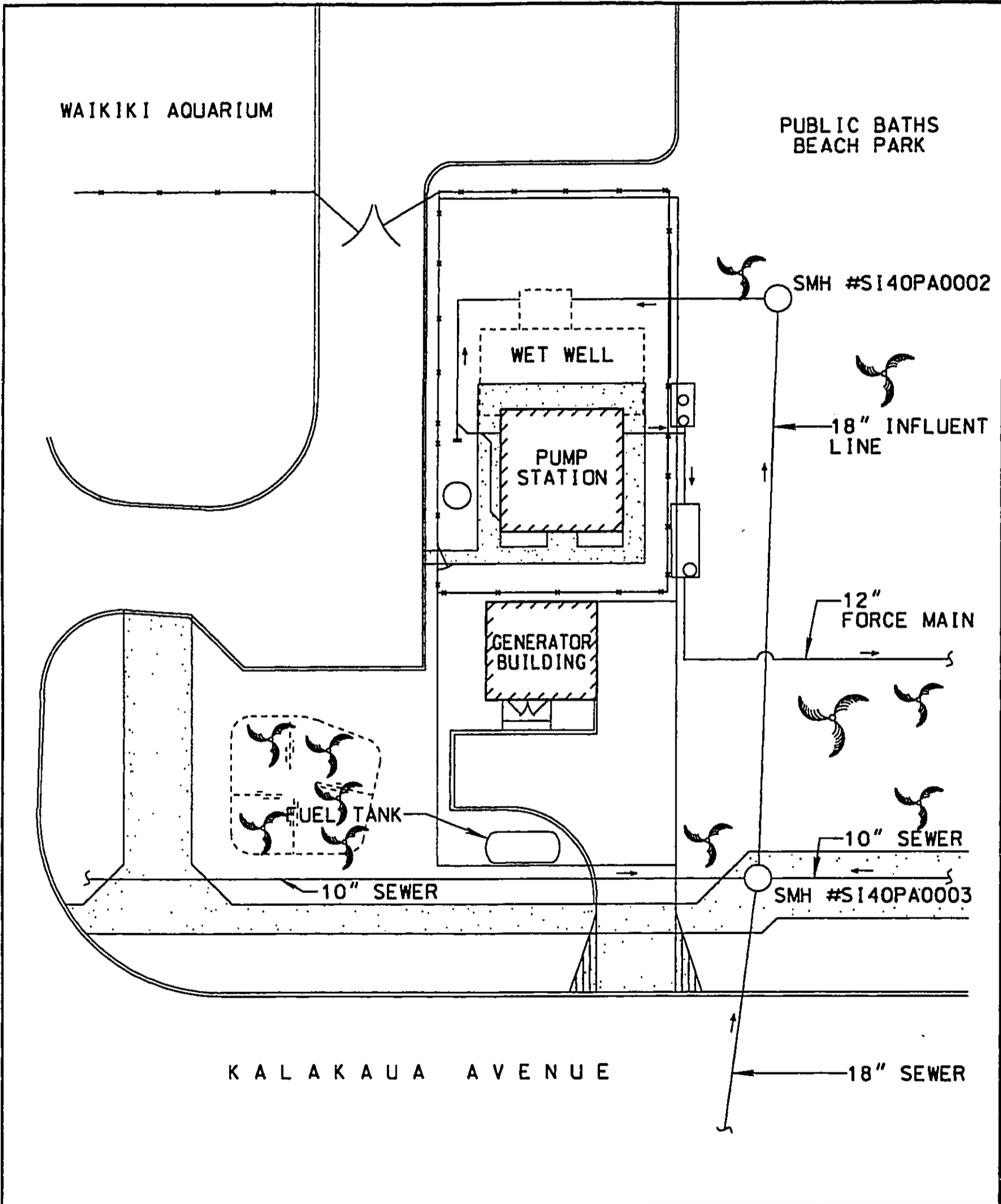


FIGURE 2.1
VICINITY MAP

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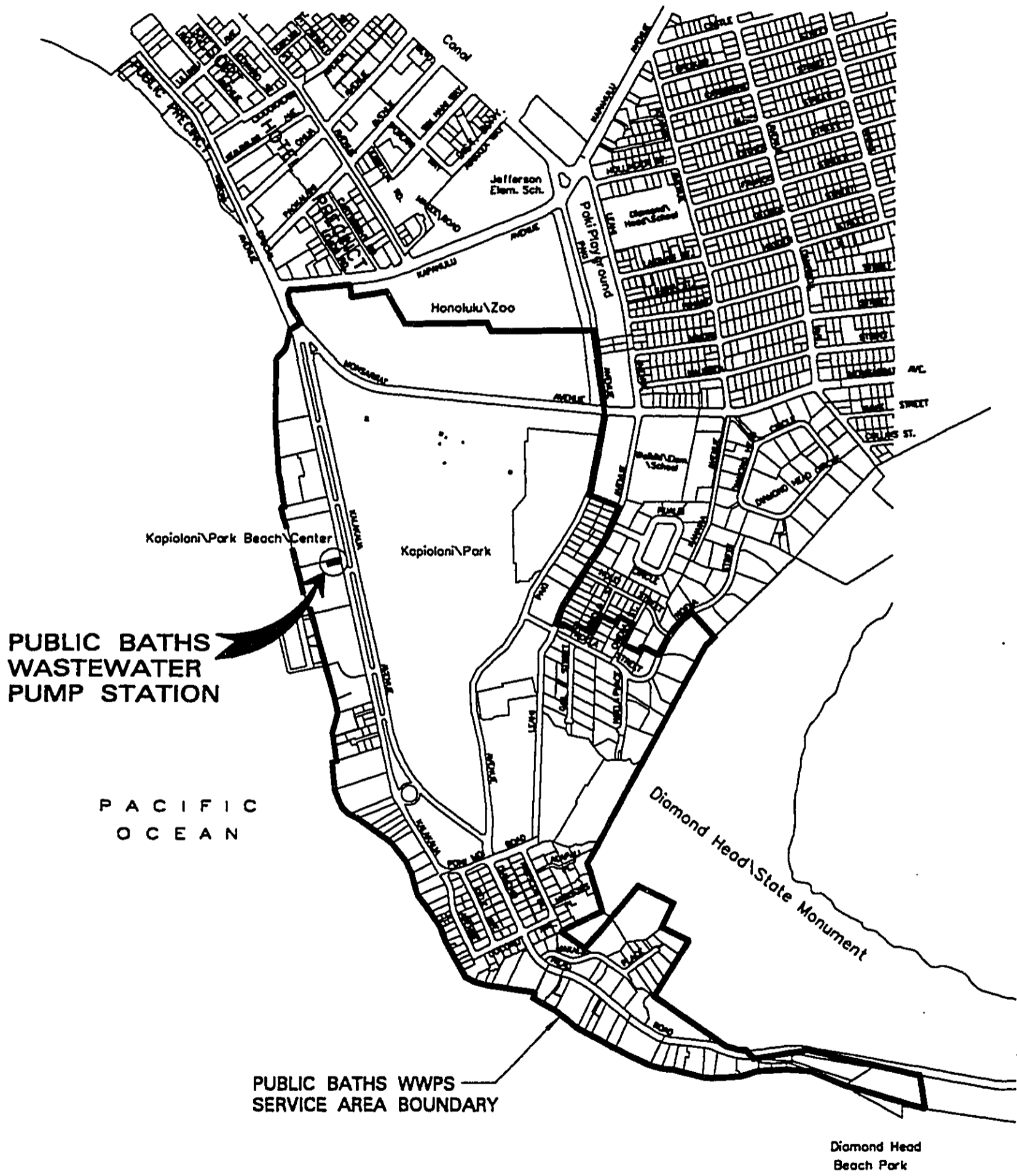
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FIGURE 2.2
EXISTING SITE PLAN

Adapted from: Public Baths Force Main Replacement
Final Preliminary Engineering Report,
Belt Collins Hawaii, November 1994

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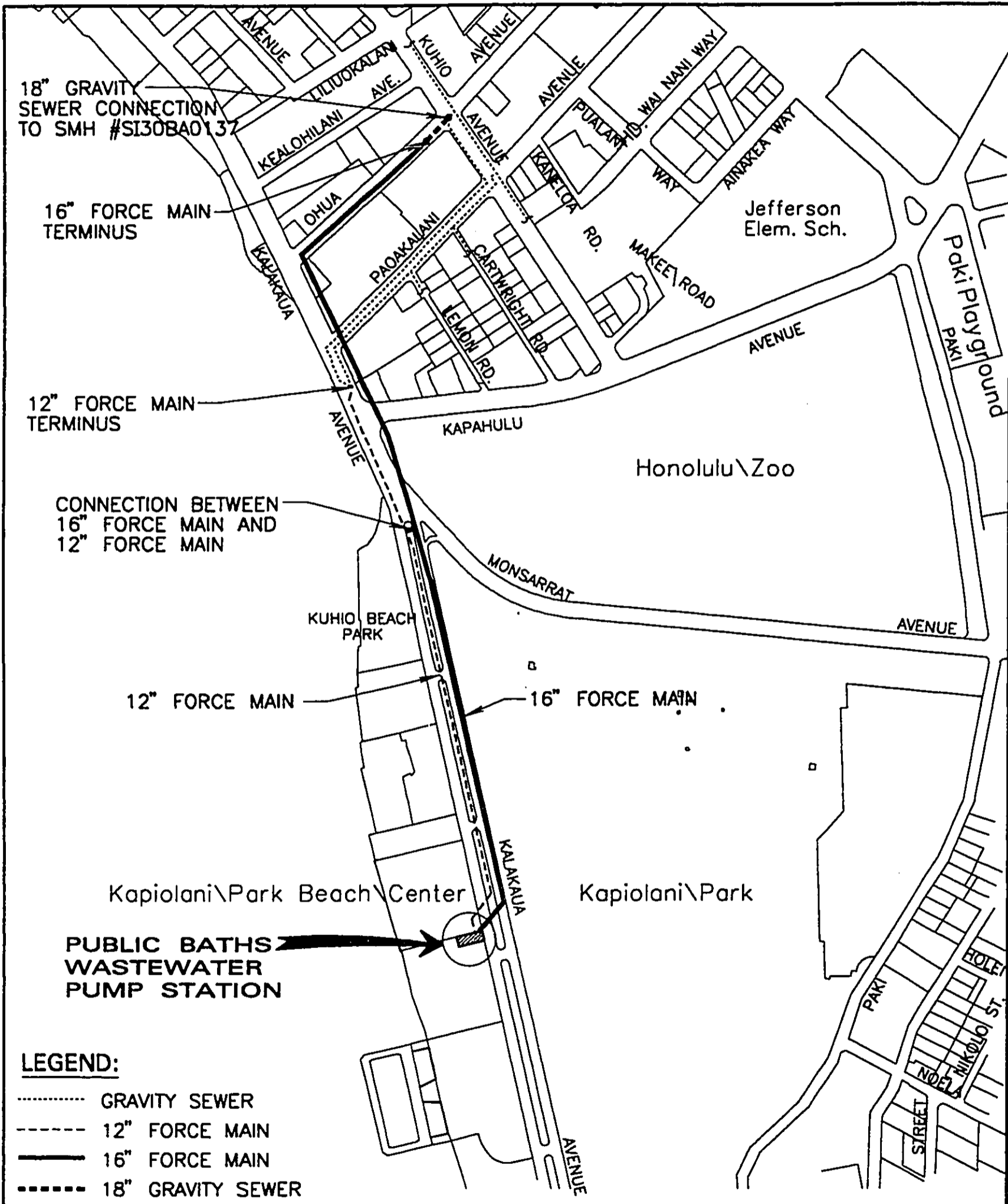


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FIGURE 2.3
 SERVICE AREA

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SCALE IN FEET

FIGURE 2.4

12" AND 16" FORCE MAINS

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- Addition of a second wet well liquid level float-type pump controller to upgrade to a dual controller system;
- Interconnection of the existing 12-inch force main to the new 16-inch force main near the pump station as a standby measure to provide uninterrupted pumping capability;
- Installation of an emergency portable pump connection to a riser pipe outside the pump station within the new flow meter housing;
- Repair of the corroded wet well interior concrete and installation of a new protective membrane coating;
- Connection of the pump house building and the emergency generator building to create an electrical room to house new electrical and telemonitoring equipment associated with the upgraded pumps;
- Expansion of the emergency generator room to accommodate the addition of low impact acoustical treatments; and
- Installation of a double-door entry and exterior access ramp at the pump building for equipment removal.

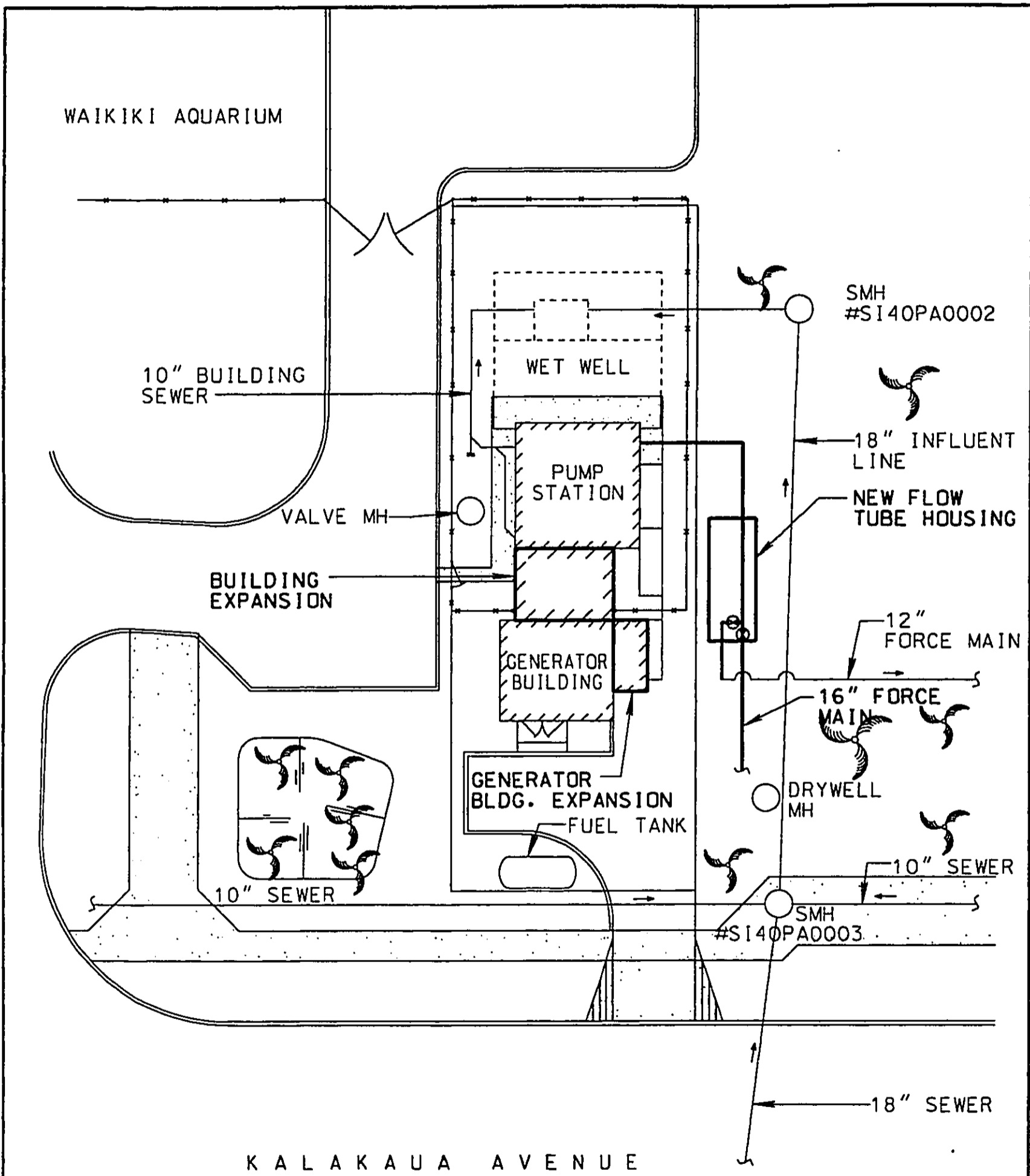
The proposed renovation work will upgrade the mechanical, electrical, and structural reliability of the pump station, bringing the facility into substantial conformance with WWM operating standards. The exterior access ramp, including handrails and other appurtenances, will be designed in accordance with the Americans with Disability Act Accessibility Guidelines (ADAAG). However, the pump station interior will not be renovated for conformance with the ADAAG. The proposed pump station modifications are illustrated on Figures 2.5 and 2.6. The finished building height will be approximately 18 feet at the highest point along the roof line.

The proposed pump station modification will be closely coordinated with the Public Baths Force Main Replacement Project (WWM Job No. W23-96) which is presently under construction.

Additionally, the construction documents will require the contractor to maintain existing wastewater collection and transmission service throughout the construction period.

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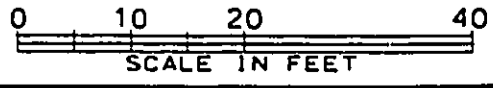


FIGURE 2.5

PROPOSED WWPS MODIFICATION - SITE PLAN

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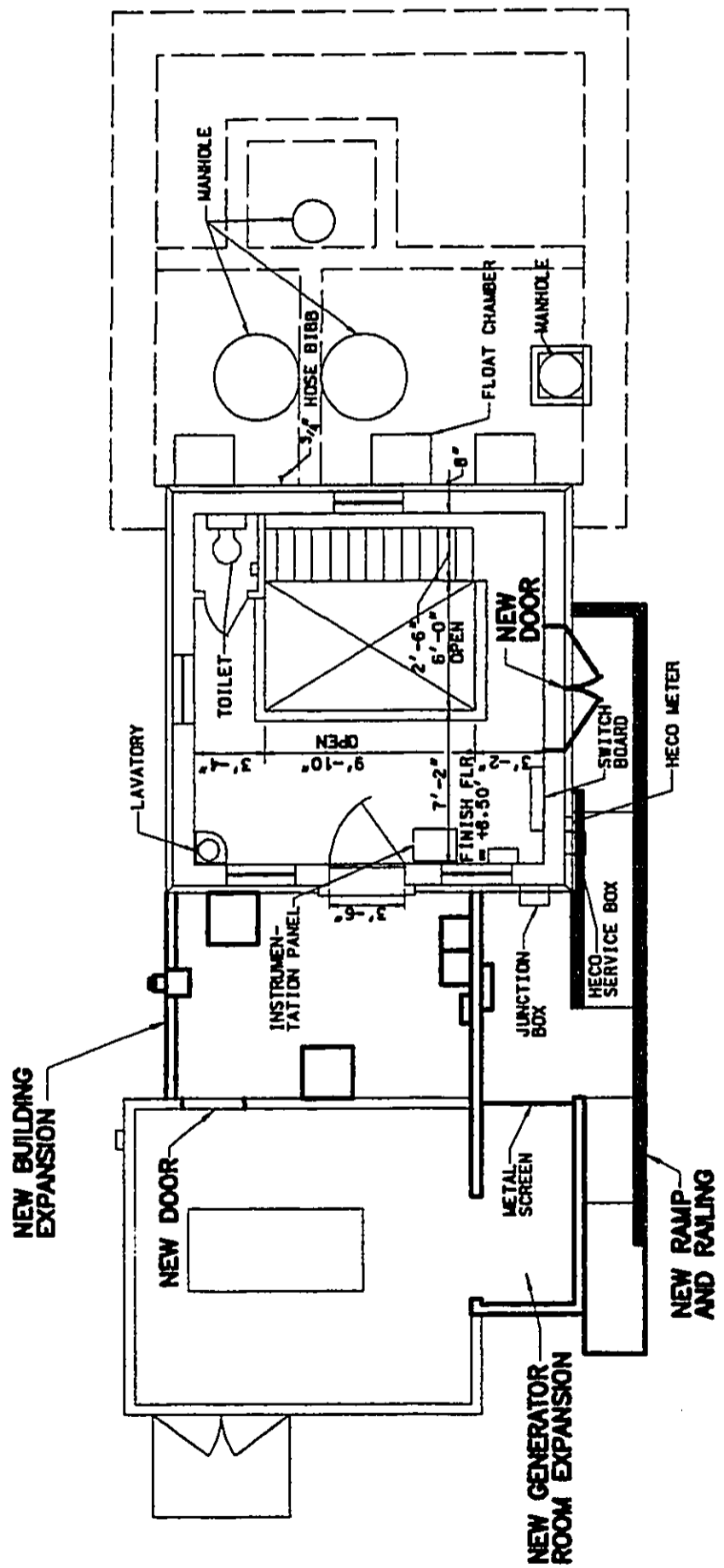
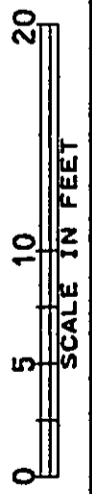


FIGURE 2.6
PROPOSED WWPS MODIFICATION - GROUND FLOOR PLAN



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2.4 PROJECT SCHEDULE AND CONSTRUCTION COST

The estimated cost to implement the recommended modifications is approximately \$1.3 million (1997 dollars). Construction of the pump station modifications may begin in fiscal year 2000 and is anticipated to require about fourteen months for completion.

CHAPTER 3

DESCRIPTION OF THE AFFECTED ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATION MEASURES

The intent of this chapter is to describe the existing project environment and potential impacts to the environment which may result from the proposed action. Mitigation measures which will be employed to minimize negative impacts will also be discussed in this chapter.

Potential impacts may be classified as "short-term" or "long-term". Short-term impacts are generally associated with the construction activity while long-term impacts are those that are lasting, resulting from the proposed project after it is constructed.

The project is not expected to have any adverse social or economic impact.

3.1 PROJECT SITE

The Public Baths WWPS is located on Kalakaua Avenue west (makai) of Kapiolani Park. The Department of Parks and Recreation's Public Baths Beach Park borders the site to the north and the Waikiki Aquarium is adjacent to the south and west. The pump station site encompasses 3,599 square feet.

3.2 CHARACTER OF THE AREA

The project site is situated on the fringe of Waikiki, surrounded by the open space of public parks and recreational areas. Nearby developments include hotels and condominiums, with residential neighborhoods flanking Diamond Head crater.

Modification of the pump station is not anticipated to incite development or change the character of the area. The anticipated increase in wastewater flows to the pump station will result from extension of the municipal sewer system to previously unsewered areas along Diamond Head Road and Makalei Place; increase in non-domestic wastewater flows from the Honolulu Zoo and Waikiki Aquarium; to accommodate the additional flows due to the infiltration and inflow into the sewer collection system; and additional domestic wastewater flows from currently vacant lots. It should be noted that the majority of vacant lots within the service area are zoned for residential development. The former Department of Land Utilization did not anticipate zone changes to increase density or the type of development within the next 20 years.

3.3 LAND OWNERSHIP

3.3.1 Existing Conditions

The pump station parcel (TMK: 3-1-31:07) is owned by the State of Hawaii and set aside for public use in accordance with Executive Order No. 02741 (February 10, 1975). Presently, the existing flow meter is housed in an enclosed, underground structure which is located outside of the pump station fence (within the neighboring beach park).

3.3.2 Potential Impacts

An easement approximately 20 feet wide will be needed on the north (ewa) side of the property (TMK: 3-1-31:04) for construction of a new flow meter housing. Construction beyond the pump station site is necessary since there is insufficient area within the present pump station parcel to construct the flow meter housing. The housing will be constructed below ground for public safety (similar to the existing structure). The proposed enclosed structure is not favored since it creates a confined space; however, due to location of the housing beyond the fence, an enclosed structure is needed for public safety.

There is a conflict over jurisdiction of the adjacent park parcel with the Kapiolani Park Preservation Society (KPPS). The KPPS claims the neighboring park (TMK: 3-1-31:04) is under jurisdiction of the Kapiolani Park Trust. A court decision could take three years for resolution.

3.3.3 Mitigation Measures

There are no measures proposed to mitigate the easement for underground facilities. The area in question is located adjacent to the existing pump station fence line and not a prime area for park users. Since the facilities will be located below grade, the park lands can continue to be used, and views will not be obstructed.

3.4 TOPOGRAPHY

The WWPS site is relatively flat, with ground elevations of approximately 7 feet mean sea level (MSL). Floor elevations within the generator building and pump building are 8.1 feet and 8.5 feet, respectively.

3.5 GEOLOGY/SOILS

Soil type and classification of the area is found in *Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii* compiled by the U.S. Department

of Agriculture Soil Conservation Service (1972). The project site soil is of the Jaucas Series, specifically Jaucas sand, 0 to 15 percent slopes (JaC).

This series contains soils that are "excessively drained, and calcareous" found in narrow strips near the ocean. The slope can be up to 15 percent but usually tend to be less than 7 percent. Typical samples are single grain, somewhat pale to very pale brown, sandy and can reach to depths of more than 60 inches. The surface may be dark brown due to organic matter and alluvium. Alkalinity ranges between neutral and moderate.

Water erosion is slight due to the slow runoff characteristics of the surface soils and relatively flat terrain. However, with the absence of vegetation, wind erosion is a severe hazard.

3.6 CLIMATE

Hawaii is located in the tropics, with relatively little seasonal variations. There are only two seasons: summer and winter. The winds are described as northeasterly trades. The trades are stronger in the afternoon and summer and weaker in the evenings and winter. The range of the average daily temperature as recorded at the nearby Honolulu Zoo is between 72 and 80 degrees Fahrenheit (with an average annual temperature of 77 degrees). Extreme temperatures of 50 degrees to 95 degrees have been recorded. The average annual rainfall is about 24 inches, with most of the rainfall occurring during the winter months (November to April).

3.7 FLOOD AND TSUNAMI HAZARD

A copy of the Federal Emergency Management Agency Flood Insurance Rate Map (FIRM) in the vicinity of the project site is illustrated on Figure 3.1. The Public Baths WWPS is located outside the 500-year flood plain.

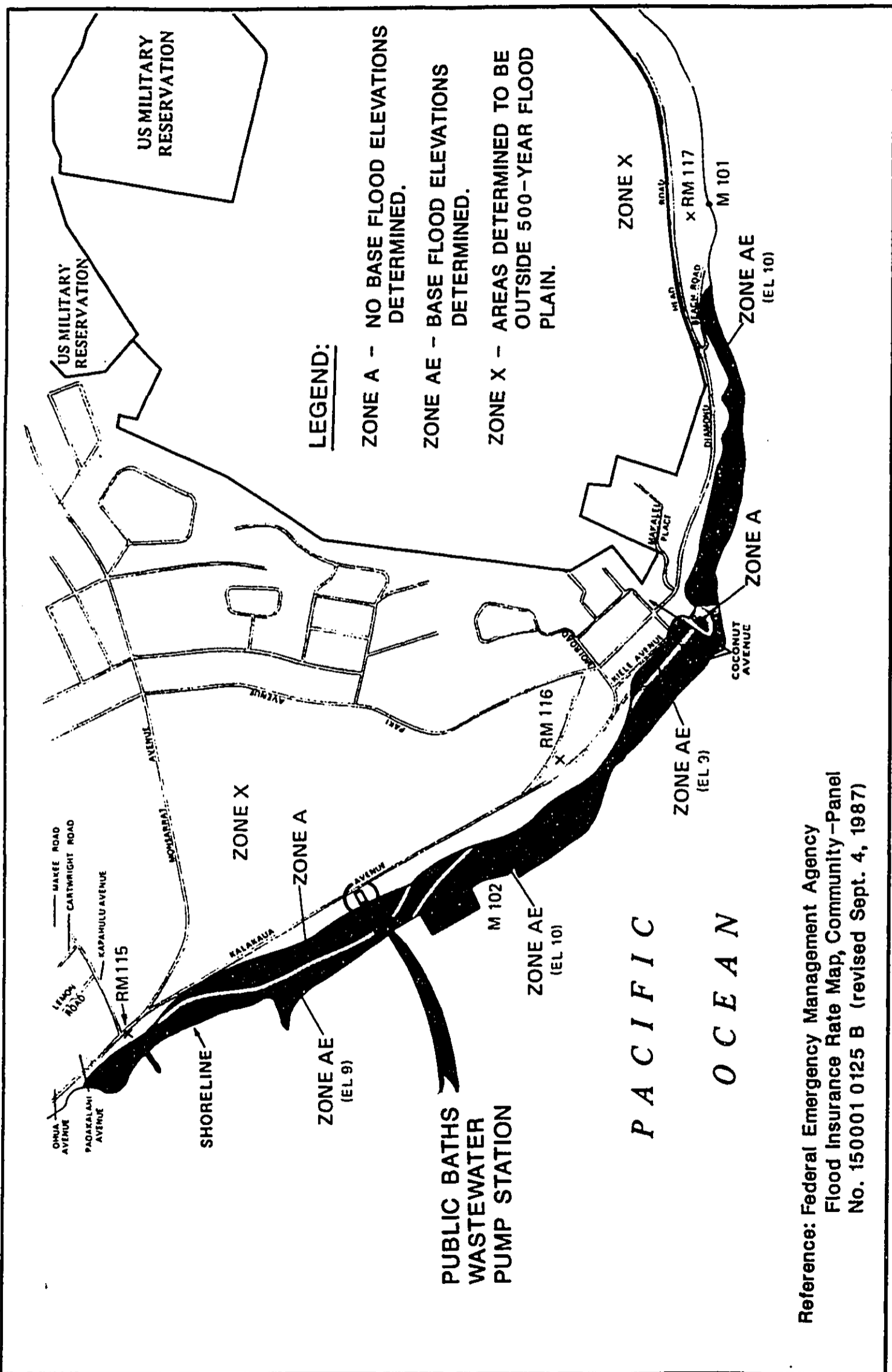
Based on the GTE Civil Defense Tsunami Evacuation Map 1: Waikiki, the WWPS site is in a tsunami evacuation area which extends from the shoreline to Paki Avenue and also includes the entire Kapiolani Park.

3.8 STATE AND COUNTY LAND USE DESIGNATION

The pump station site and neighboring park land (TMK 3-1-31: portion of 4) are located within the State Land Use Urban District. These lands are zoned P-2, General Preservation District, on the City and County of Honolulu Development Plan Map (see Figure 3.2). The pump station is a public use structure which is a principal use, allowable under the current zoning.

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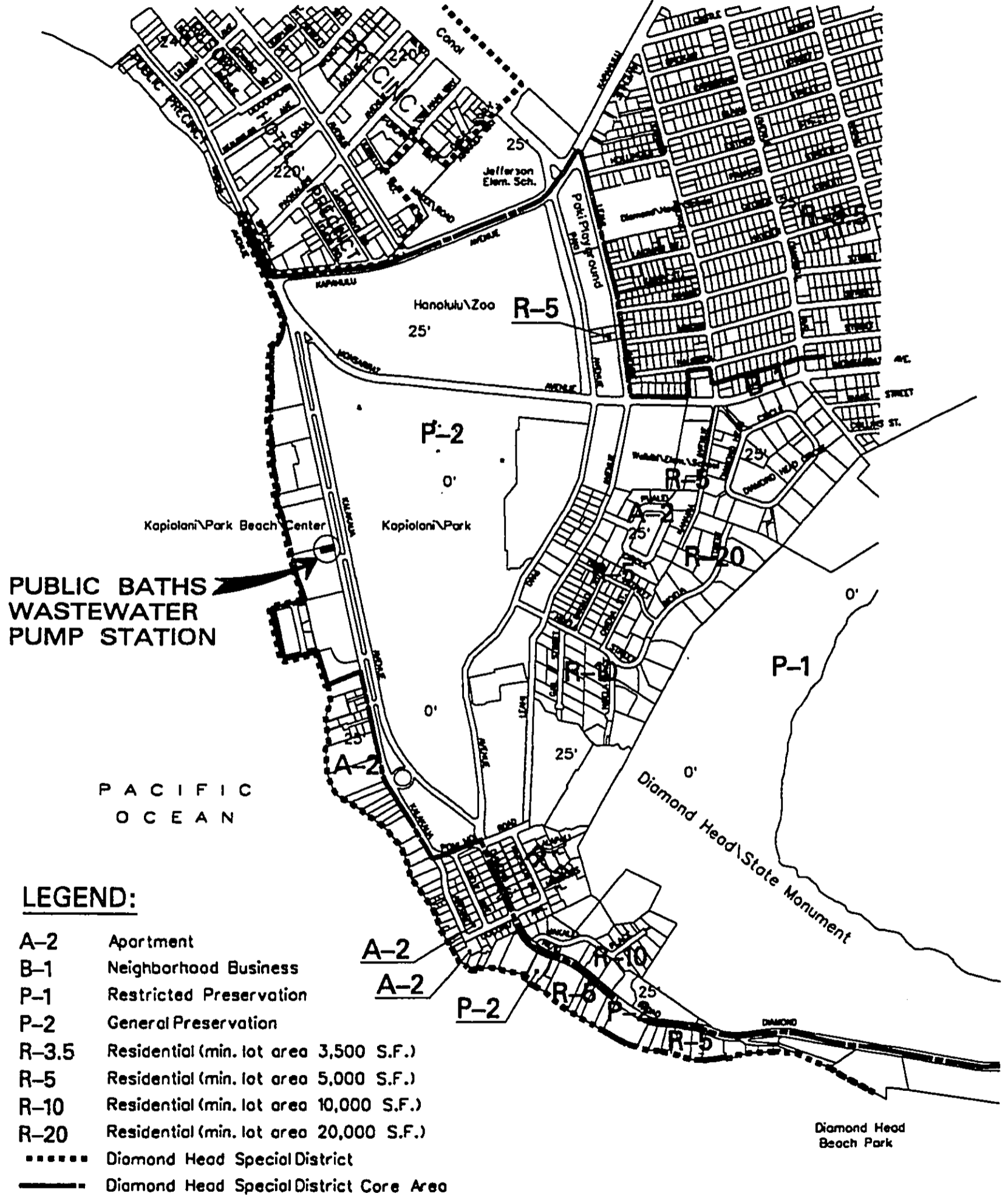


Reference: Federal Emergency Management Agency
 Flood Insurance Rate Map, Community - Panel
 No. 150001 0125 B (revised Sept. 4, 1987)



FIGURE 3.1
 FLOOD HAZARD MAP

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SCALE IN FEET

**FIGURE 3.2
EXISTING LAND USE
AND ZONING MAP**

A waiver of the development or design standards will be required for the following:

- exceeding the maximum building area (5 percent of the zoned lot) allowed for P-2 General Preservation District; and
- constructing into the 30-foot front yard setback and 15-foot side yard setback.

3.9 SPECIAL MANAGEMENT AREA

The project site is located within the Special Management Area (SMA). Refer to Figure 3.3 for the SMA boundary in the project vicinity.

Modification of the pump station will be subject to a Special Management Area Use Permit (SMP) due to development within the SMA. Due to the estimated construction cost for the pump station modification, the need for a major permit is anticipated. The project will be subject to conditions of the SMP.

3.10 DIAMOND HEAD SPECIAL DISTRICT

The project site is located within the core area of the Diamond Head Special District (see Figure 3.4). Renovation of existing structures and new construction shall conform to the design controls set forth for the special district. These design controls include landscaping requirements, height limitations and architectural design review.

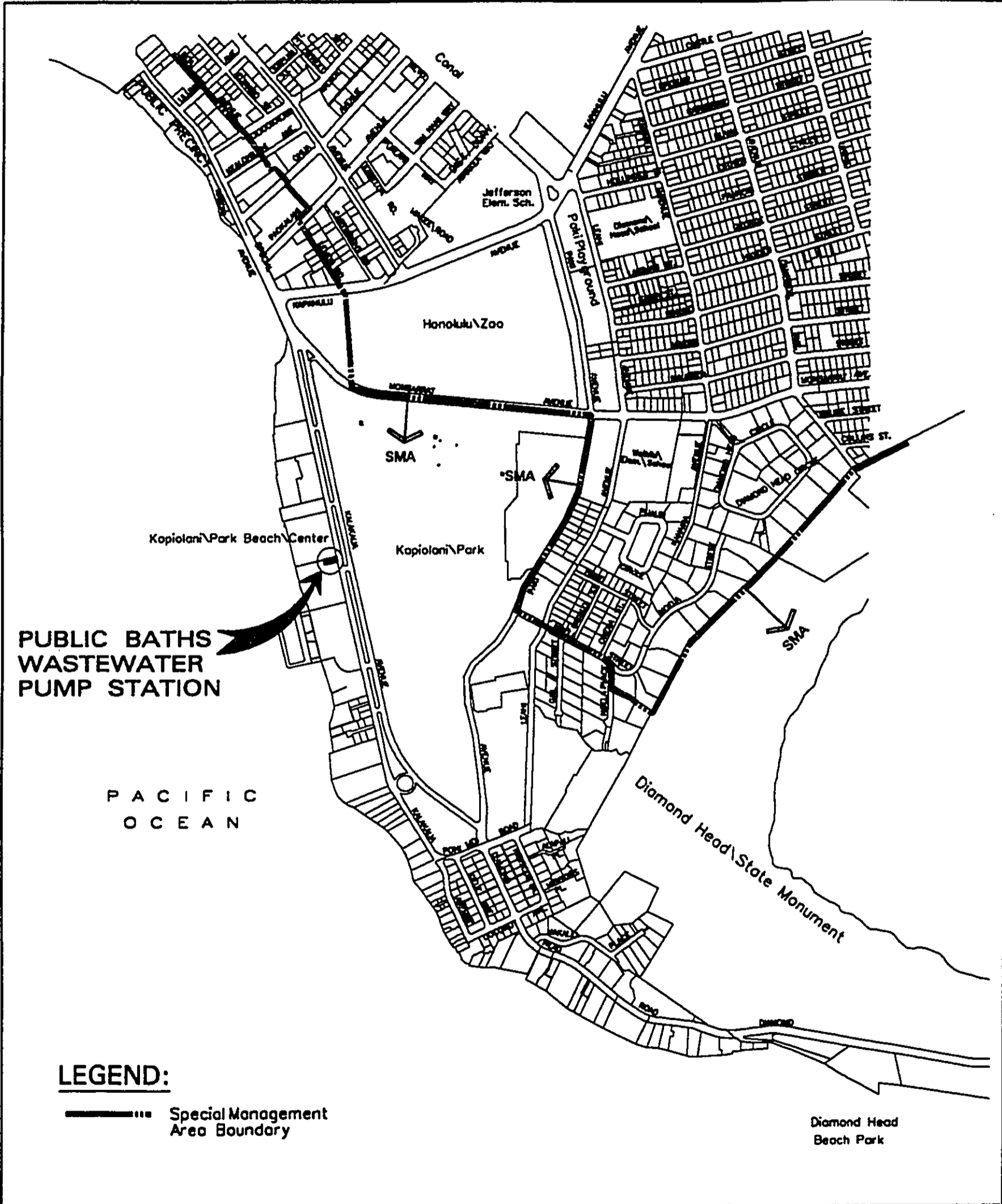
It is anticipated that the proposed pump station modifications will be classified as a minor project with minimal impact, subject to a minor permit with review and approval by the DLU Director. The project will be constructed in compliance with conditions of the special district permit.

3.11 FLORA

The botanical resources in the project site are limited to introduced species due to previous development and landscaping. Little or no original plant species remain in the area. Several coconut trees are located beyond the northern (ewa) fence line within the Public Baths Beach Park property. Nearby, there are several ironwood trees along Kalakaua Avenue and monkey pod trees outside the Honolulu Zoo fence line that are designated as "exceptional trees". These trees will not be disturbed by the project.

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**PUBLIC BATHS
WASTEWATER
PUMP STATION**

LEGEND:

—— Special Management Area Boundary



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SCALE IN FEET

**FIGURE 3.3
SPECIAL MANAGEMENT
AREA MAP**

There are no endangered or threatened botanical resources known to exist within the project site. No impacts are anticipated and no mitigation measures are proposed.

3.12 AIR QUALITY

3.12.1 Existing Conditions

There is no routine monitoring of air quality in the area of the Public Baths WWPS. It is believed that the ambient air quality is good due to the presence of the prevailing tradewinds and the lack of major sources of air pollution activity. Motor vehicle traffic, especially during peak hours, appears to be the only source of air pollution.

According to pump station operations personnel, there is no record of complaints regarding odors emanating from the pump station. A recent study conducted by Fukunaga & Associates, Inc. for WWM did not recommend installation of an odor control treatment system at the pump station.

3.12.2 Potential Impacts

During construction, generation of fugitive dust during demolition, earthmoving and other activities may result in a temporary impact on air quality.

Long-term air quality may be impacted by emissions from the emergency generator. However, this long-term impact will be intermittent, occurring predominantly during the weekly testing of the generator, which is part of the standard operating procedure. Other than the weekly testing, the emergency generator would not activate unless an electrical power outage occurs. Emissions from the engine generator stack will have no significant impacts.

3.12.3 Mitigation Measures

To ensure compliance with DOH regulations, an effective dust control plan will be implemented during construction. Dust control measures may include watering the work area, use of wind screens, keeping the adjacent roadways clean, and covering open-bodied trucks. Other dust control measures may include mulching or stabilizing inactive exposed areas, and scheduling permanent paving or landscaping early in the construction schedule. The construction documents will require the contractor to comply with the provisions of Hawaii Administrative Rules, Chapter 11-60.1, Section 11-60.1-33.

In the event pump station odors become a concern, chemical dosing may be implemented at the wet well.

3.13 NOISE

3.13.1 Existing Conditions

During operation of the existing 60 KW emergency generator, the measured noise levels at the pump station property line range between 75 and 82 dBA (see Figure 3.5). The applicable State Department of Health (DOH) daytime noise limit along the property line is 55 dBA. However, daytime background ambient noise levels also exceed 55 dBA. The existing background ambient noise levels at the Kalakaua Avenue property line varied from 55 to 75 dBA, and was 63 dBA at the Waikiki Aquarium property line. The closest residence is situated approximately 950 feet away from the pump station and the generator noise level there is probably inaudible during the day (less than 50 dBA).

There is no record of any noise-related complaint for this pump station.

3.13.2 Potential Impacts

Short-term impacts may result from construction activities. Adverse impacts from construction noise are not anticipated to affect public health and welfare due to the temporary nature of the work and the administrative controls available for its regulation.

Preliminary calculations indicate that the existing 60 KW generator will be adequate for the proposed upgrades. The generator will be able to handle the power load for three operational pumps. Existing noise levels at the property line would continue unless appropriate noise abatement measures are constructed.

3.13.3 Mitigation Measures

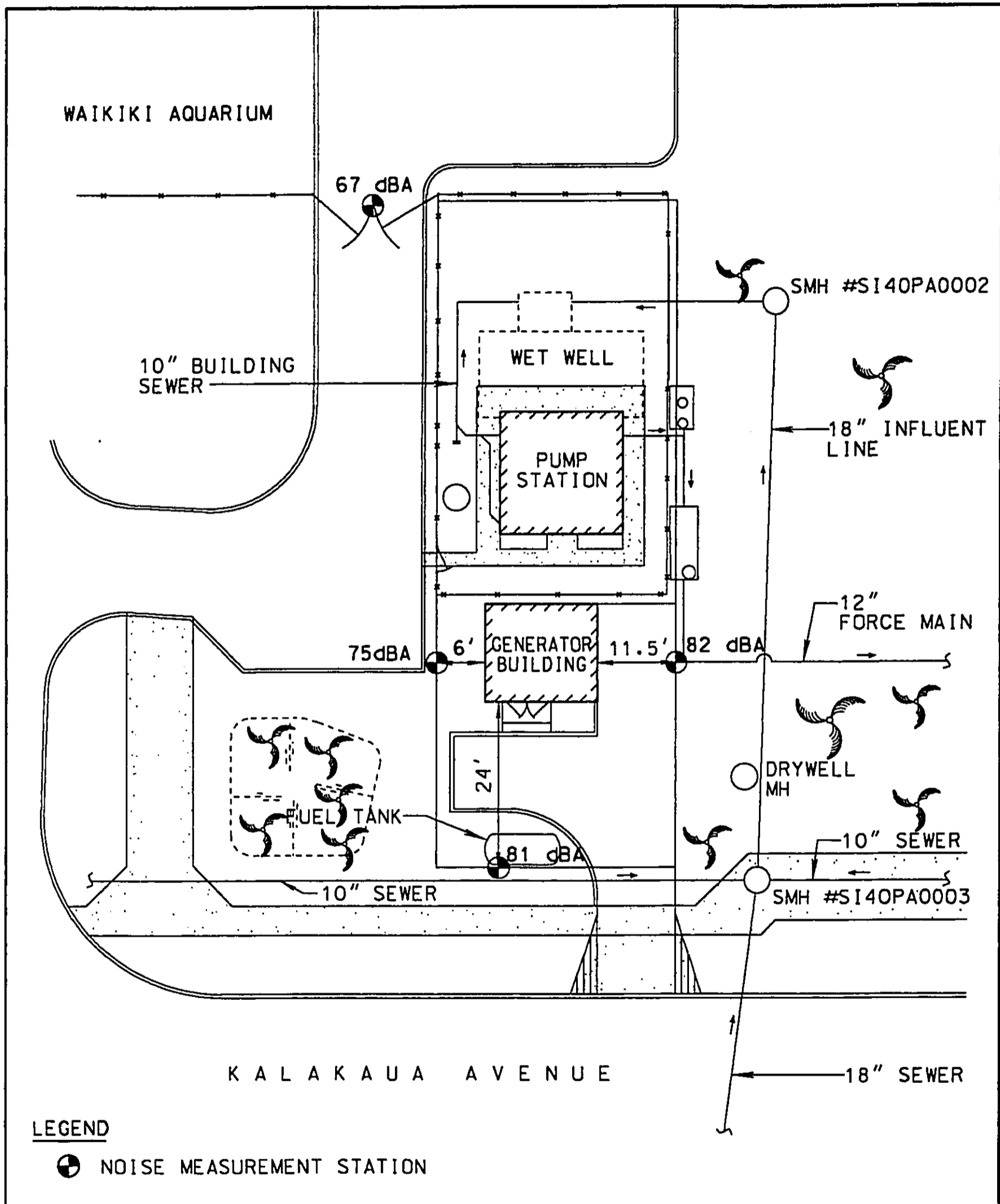
Short-term mitigation measures to reduce the impact of construction noise include compliance with Hawaii Administrative Rules, Chapter 11-46 "Community Noise Control". The contractor will also be required to comply with City and County noise regulations, including those specified in the grading permit.

Low impact acoustical treatments will be provided to mitigate long-term noise impacts by reducing the noise levels at the property line by 22 to 27 dBA. These modifications include:

- Construct an air ventilation opening in the hollow CMU wall below the existing beam on the south side for insertion of a bank of duct silencers. Furr the underside and mauka side of the duct silencer bank with 2" channels, insulation and 5/8" gypboard.

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FIGURE 3.5

EXISTING NOISE MEASUREMENTS WITH 60 KW GENERATOR ON

- Add a suspended acoustical ceiling, consisting of 1-1/2" thick fiberglass panels, between the beams in the remaining ceiling space which is not occupied by the intake silencers;
- Add 4" thick, semirigid insulation to all bare wall surfaces down to the 1 ft height line;
- Remove existing discharge air louvers and add a new, lined, discharge air plenum to the Ewa wall. Install duct silencers within the plenum.
- Replace existing louvered doors with solid steel doors. Fill opening above the doors with solid core CMU or concrete.
- Relocate existing vent for the day tank, remove existing exhaust silencer and add two new exhaust silencers.

To meet the DOH 55 dBA daytime noise limit, major modifications to the pump station would be necessary, resulting in a high cost. These modifications include:

- increased duct silencer length;
- increased emergency generator building size; and
- addition of a furred gypboard layer to the interior building walls and sloping roof slab.

Presently, there are no plans to implement these major acoustical modifications.

3.14 ARCHAEOLOGY/HISTORIC SITES

3.14.1 Existing Conditions

According to the State Historic Preservation Division, the project site is considered to be located within Kapiolani Park, which is listed on the Hawaii Register of Historic Places. The pump station building was constructed in 1944 and is considered to be a historic structure since it is over 50 years old.

The potential for historic resources to exist at the project site was evaluated by the International Archaeological Research Institute and reported in the *East Mamala Bay Final Wastewater Facilities Plan* (December 1993). The findings stated a high probability of encountering archaeological midden deposits related to prehistoric Hawaiian habitation and burials. On May 18, 1993, human remains were encountered during excavations for improvements to the Waikiki Aquarium,

immediately adjacent to the pump station site. In addition, over 40 burials have been recovered in the beach sand along the shoreline of Waikiki.

3.14.2 Potential Impacts

It is possible that archaeological deposits may be unearthed during construction excavation for the pump station modification.

3.14.3 Mitigation Measures

A written archaeological monitoring plan will be prepared and submitted to the *State Historic Preservation Division* for review and acceptance prior to the onset of construction activities. In addition, excavations will be monitored by a qualified professional archaeologist who will record the occurrence of any archaeological deposits encountered and take appropriate action should significant deposits or human remains be unearthed.

3.15 AESTHETICS

3.15.1 Existing Conditions

The pump building and generator building are of similar construction type. The appearance of the two buildings is similar with respect to color, concrete/masonry walls and tile roofing.

Coastal views from Kalakaua Avenue are possible on the north side of the pump station site, within the neighboring park. Coastal views on the south side of the site are essentially obstructed by structures within the Waikiki Aquarium, located to the south and west of the pump station site. The present space between the two buildings is narrow, with a view corridor perpendicular to the coast. Views between the buildings are further reduced due to perimeter fencing and hedges which surround the pump station site. Refer to **Figure 3.6** and **Photos 1 and 2** for these views.

3.15.2 Potential Impacts

Modifications and improvements to the existing pump station will consist of integrating the existing pump and generator buildings into one building by enclosing the area between the two structures with masonry walls; and expanding the existing generator building on the northwest side. The expansion will include masonry walls and a concrete slab ceiling.

The proposed structural modifications will merge the pump building and generator building, unifying the appearance of the two separate structures into one. The

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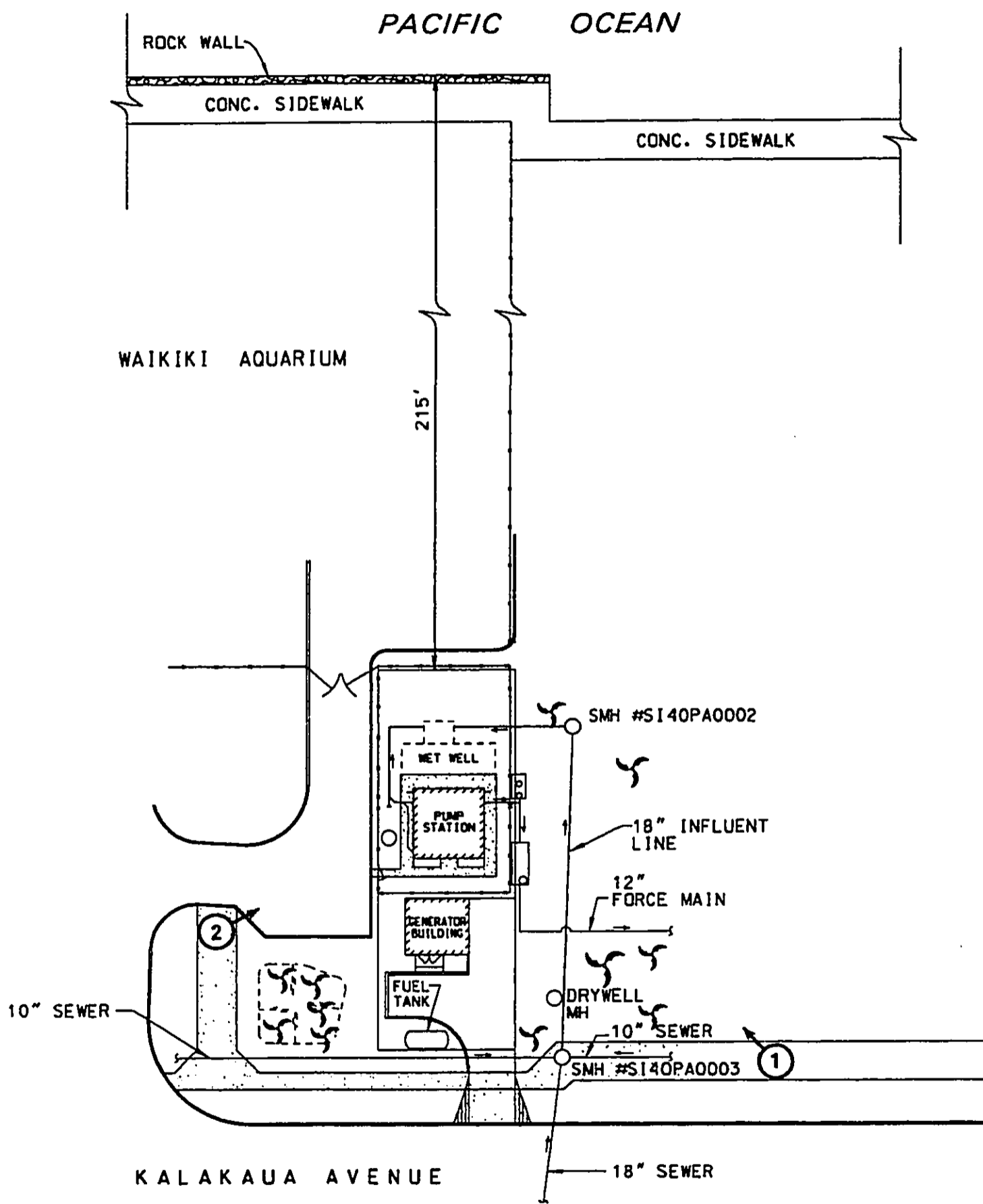


FIGURE 3.6

PHOTO LOCATION MAP



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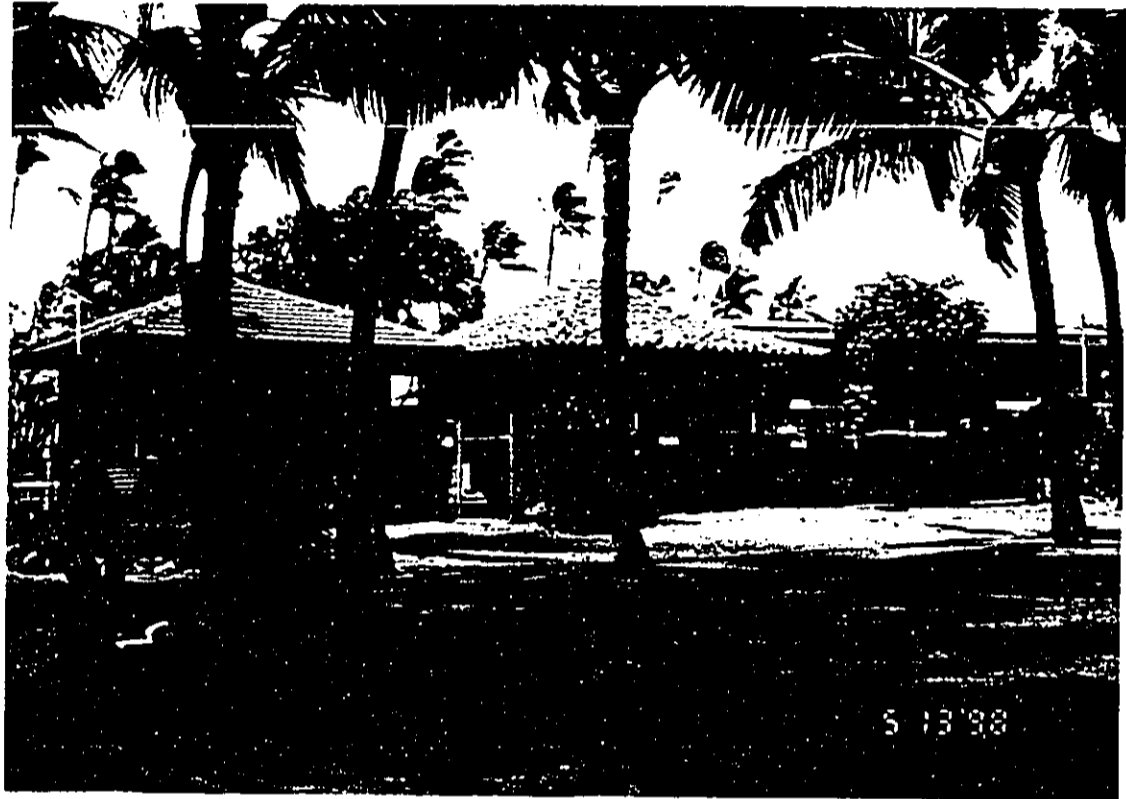


PHOTO 1 - View Facing South



PHOTO 2 - View Facing North

roof lines will be aligned and new roofing (similar to the existing generator building) material will be used over the whole building. The complete building will incorporate materials, finishes, and colors, including roofing, that are non-reflective and subdued in nature (see Figures 3.7, 3.8 and 3.9). The proposed building modifications have been reviewed by the State Historic Preservation Division. They concur with the proposed architectural design.

Connection of the two buildings will not substantially diminish any views from any of the prominent public vantage points described for the Diamond Head Special District. In addition, the generator room expansion will not impact coastal views since the view plane is currently obstructed by the pump building, perimeter fence, landscaping, and the aquarium facilities to the rear of the pump station.

3.15.3 Mitigation Measures

All renovations to the existing pump building and generator building will conform to the design controls established for the special district. These include landscaping, height limitations, and architectural design review.

3.16 TRAFFIC

3.16.1 Existing Conditions

Presently, the project site generates very little traffic. Maintenance personnel visit the pump station several times a day and the emergency generator is tested on a weekly basis by another crew.

3.16.2 Potential Impacts

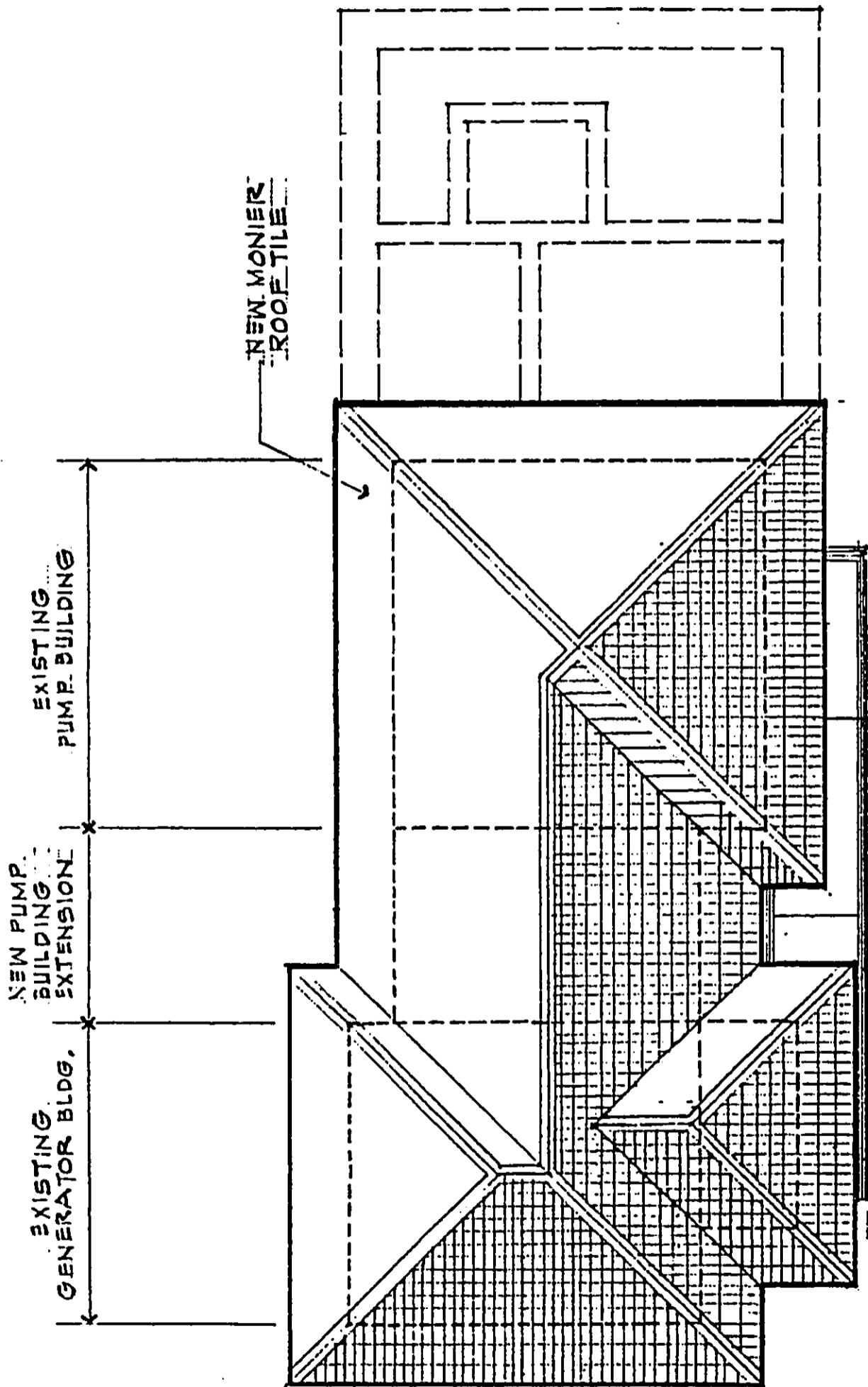
There may be increased traffic in the short-term during construction activities due to construction vehicles entering and exiting the project site. However, no long-term traffic impacts are anticipated as a result of the pump station modification.

3.16.3 Mitigation Measures

If traffic congestion occurs during construction, police officers may be employed by the contractor to direct traffic on Kalakaua Avenue fronting the project site. Construction plans for all work within Kalakaua Avenue and/or its right-of-way will be submitted to the Department of Transportation Services for approval.

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FIGURE 3.7

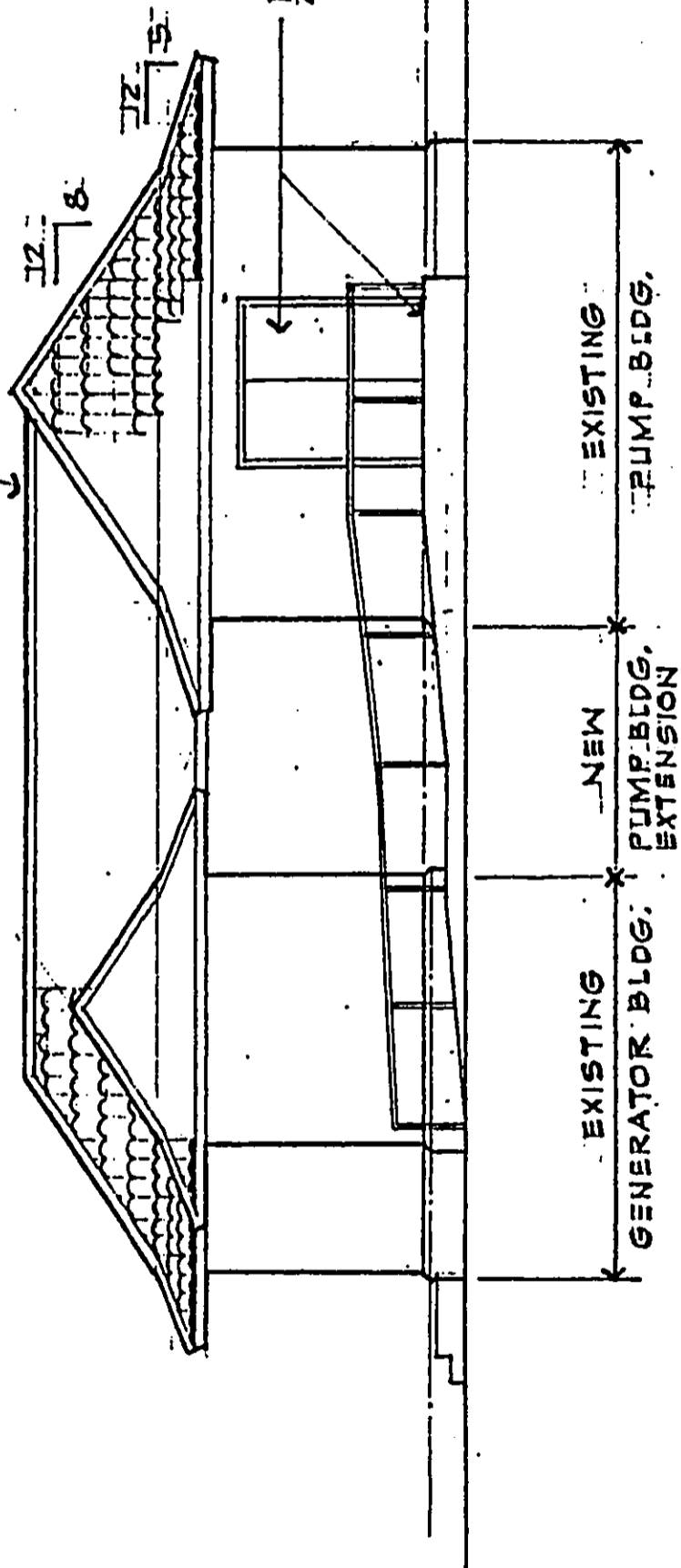
PROPOSED WWPS - ROOF PLAN MODIFICATION

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NEW MONIER
ROOFING

NEW DOOR
AND RAMP



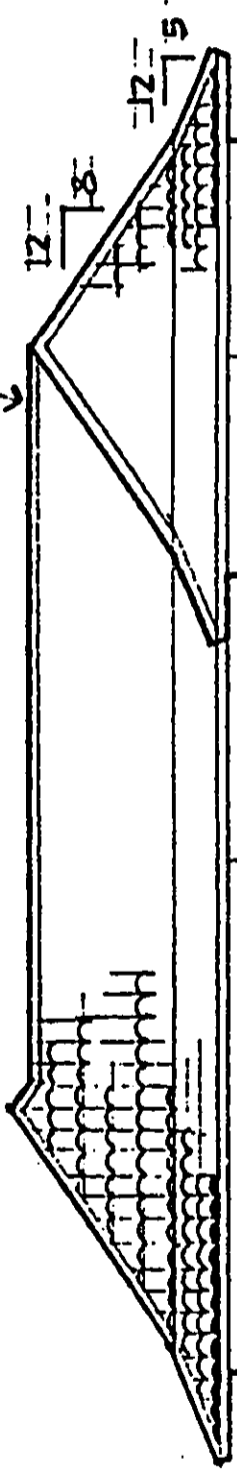
PROPOSED WWPS - NORTH EXTERIOR ELEVATION

FIGURE 3.8

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NEW MONIER
ROOF TILE



EXISTING PUMP BLDG.
NEW PUMP BLDG. EXTENSION
EXISTING GENERATOR BLDG.



PROPOSED WWPS - SOUTH EXTERIOR MODIFICATION ELEVATION

FIGURE 3.9

3.17 PARK/PARK USERS

3.17.1 Existing Conditions

The Department of Parks and Recreation maintains the Public Baths Beach Park, located adjacent to the project site. The old beach center was recently demolished and replaced with new facilities, including rest room facilities and a pavilion utilized by beachgoers and picnickers.

3.17.2 Potential Impacts

The proposed project will have both short-term and long-term impacts on the neighboring park and its users. Short-term impacts will be related to construction activities and may include temporary use of park lands for: contractor's field office; material storage/staging area; detention, treatment and discharge of effluent from construction dewatering; and vehicle parking. In the long-term, the proposed project will require a 20-foot wide strip of park land for underground WWPS facilities. However, the impact of this easement is anticipated to be minimal since all facilities will be constructed below ground, views will not be obstructed nor will any use of park lands be diminished.

3.17.3 Mitigation Measures

Use of park lands will be coordinated with the Department of Parks and Recreation. Should temporary use of park land be required during construction, the contractor will be required to secure his equipment and ensure public safety.

3.18 SPILLS/LEAKAGE

3.18.1 Existing Conditions

An assessment of the existing spill situation, including spill prevention activities and spill response plans has been evaluated in the *Spill Reduction Action Plan* (SRAP) report, prepared for the Department of Wastewater Management in 1995. The report concluded the spill urgency ranking for the Public Baths WWPS was "low".

3.18.2 Potential Impacts

The proposed project will have the potential to generate short-term impacts due to construction spills or leaks when making pipe connections to the existing facility.

3.18.3 Mitigation Measures

Spill prevention and response during construction will be addressed in a mitigation plan to be prepared by the contractor which will require approval of the Department of Design and Construction.

CHAPTER 4

ALTERNATIVES TO THE PROPOSED PROJECT

This chapter discusses alternatives to the proposed action. Two of the alternatives would attain the objectives of the proposed action, albeit at higher cost or to a lesser degree of public advantage. The third alternative is for "no action" which would fail to achieve the project objectives.

To restate, the overall objectives of the project are:

- To increase pump station capacity to meet the future peak design flow of 3.2 mgd;
- To upgrade pump station reliability in conformance with the City and County of Honolulu Department of Environmental Services standards; and
- To reduce noise levels at the property line associated with operation of the emergency generator.

A description of each alternative is presented in this section for comparison with the proposed action.

4.1 NO ACTION

With this alternative, no significant capital improvements would be made to the existing Public Baths WWPS. Operation and maintenance of the pump station would continue, with equipment repair and replacement scheduled as needed.

However, the "no action" alternative is not acceptable since the existing pumps cannot convey the future design peak flow of 3.2 mgd to the new force main discharge point. In addition, the pump station cannot adequately convey the current wet weather peak flow through the new force main. Piping within the pump station which was originally constructed in 1944, is old and worn. The reliability of the station has slowly decreased with age. This alternative will also fail to meet the project objective to reduce noise levels associated with operation of the emergency generator.

4.2 CONSTRUCTION OF A NEW PUMP STATION ON AN ADJOINING PARCEL

Construction of a new pump station on an adjacent parcel of land was considered. Construction of a new pump station would allow ideal layout of the facility. The

pumps, emergency generator, wet well, dry well, piping and building layout would be designed to ENV standards without compromise. All of the design codes would be met, and dry pit vertical pumps with ground level motors would be installed. Another advantage of this alternative is that the existing pump station could remain in operation, without interruption of service, until completion of the new station. Construction phasing would not be required to maintain the pump station operation.

However, there are two major drawbacks associated with this alternative:

- Acquisition of 0.2 to 0.3 acre of land within the Public Baths Beach Park would be required for construction of the new pump station; and
- The estimated construction cost of \$2.9 million is approximately \$1.6 million more than the cost of the proposed action. Land acquisition expenses would further increase the capital cost associated with this alternative.

This alternative is viable but not favored, due to the higher capital cost and land acquisition requirement.

4.3 MODIFICATION OF THE EXISTING PUMP STATION FOR NEW DRY WELL VERTICAL PUMPS AND GROUND LEVEL MOTORS

The third alternative considered was replacement of the existing pumps with new, dry well vertical pumps and ground level motors. Although this alternative would meet the WWM design criteria by implementing the preferred pump and motor arrangement, it is not feasible due to dimensional constraints of the existing pump station structure.

- Major modifications to the ground floor level of the pump station would be required for installation of the ground level motors. Presently, the pump station has a 10' x 6' opening in the ground floor slab to facilitate equipment removal from the pump room below. If the opening was maintained, there would not be adequate floor space above the pumps to secure the motors. Alternately, filling the opening and creating several smaller openings for equipment removal would be expensive.
- Within the pump room, there would not be enough clear space between the pumps and stairwell due to the associated piping and appurtenances. Modifications to the existing pump station walls or relocation of the stairwell would be extensive.

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- Construction of an intermediate floor to secure the pump motors would also be difficult.

CHAPTER 5

DETERMINATION, FINDINGS AND REASONS SUPPORTING DETERMINATION

5.1 DETERMINATION

The Department of Environmental Services has concluded that the proposed project does not have the potential to generate significant environmental impacts, and the need to prepare an environmental impact statement is not foreseen. This Final EA has been submitted with a Finding of No Significant Impact (FONSI) determination.

5.2 FINDINGS AND REASONS SUPPORTING DETERMINATION

The overall and cumulative effects of the proposed action were evaluated with respect to Hawaii Administrative Rules (HAR) Title 11, Department of Health, Chapter 200, Environmental Impact Statement Rules, Section 11-200-12 "Significance Criteria". The following findings and conclusions can be made in support of the FONSI determination:

- (1) The proposed project will not involve an irrevocable commitment to loss or destruction of any natural or cultural resource. There will be no loss of park land; however, an easement will be requested for appurtenant facilities to be constructed underground within the park.
- (2) The proposed project will not curtail the range of beneficial uses of the environment. The proposed improvements will be constructed within an existing pump station site. Those improvements constructed outside of the property will be constructed underground and will not curtail the existing park uses.
- (3) The proposed project will not conflict with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders.
- (4) The proposed project will not have a substantial negative effect on the economic or social welfare of the community or state. Rather, the impact of the project on the community will be positive in that wastewater transmission will be improved.
- (5) The proposed project will not substantially affect public health. Rather, the proposed improvements are an effort to improve reliability

of the pump station, resulting in an improvement to protect public health.

- (6) The proposed project will not involve substantial secondary impacts such as population changes or negative effects on public facilities. The proposed improvements were programmed to improve the regional wastewater infrastructure.
- (7) The proposed project will not involve a substantial degradation of environmental quality. The project will instead work to protect environmental quality by improving the pump station reliability and minimizing the potential for spills and malfunction.
- (8) The proposed project will not have a considerable cumulative effect upon the environment or involve a commitment for larger actions. As stated previously, the project is one phase of improvements addressed in the *East Mamala Bay Wastewater Facilities Plan Final EIS*. The cumulative impact of this "larger action" has been previously addressed.
- (9) The proposed project will not have a substantial effect on any rare, threatened, or endangered species or its habitat since there are no species or habitat of this nature present within the site.
- (10) The proposed project will not cause long-term detrimental effects on air or water quality or ambient noise levels. Rather, the proposed modifications to the pump station will improve existing conditions. Noise abatement measures will be installed. Rehabilitation of the existing aged facilities will reduce the potential for equipment failure which may result in air or water quality impacts.
- (11) The project site is located within a tsunami evacuation area. However, the proposed project includes installation of submersible pumps which are unlikely to suffer damage should flooding occur.
- (12) The proposed project will not substantially affect scenic vistas and view planes identified in county or state plans or studies. Connection of the two buildings and the generator building expansion will not impact views of the coastline or Kapiolani Park.
- (13) The proposed project will not require substantial energy consumption. Existing pumps each have a 7.5 hp or 10 hp capacity. Proposed pumps will each have a 15 hp capacity. The relatively small size pumps will not require a substantial increase in energy.

CHAPTER 6

CONSULTATION

6.1 PARTICIPANTS

This Final EA was prepared for the Department of Environmental Services, City and County of Honolulu, by Engineering Concepts, Inc. The following organizations were also involved in the preparation of this document.

<u>Organization</u>	<u>Area of Expertise</u>
Anbe, Aruga & Ishizu Architects	Architecture
Y. Ebisu & Associates	Acoustical Engineering

6.2 PARTIES CONSULTED DURING PREPARATION OF THE FINAL EA

Forty two (42) copies of the Draft EA were mailed to agencies, organizations and other interested parties. A complete listing of these consulted parties is included in Sections 6.2.1 through 6.2.4.

Availability of the Draft EA was published in the August 8, 1997 edition of *The Environmental Notice* by the Office of Environmental Quality Control. A total of 15 comment letters were received as of October 20, 1997. Agencies and organizations responding to the request for comments are marked with an asterisk (*) in the lists which follow.

6.2.1 State Government

- State Legislature:
 - Senator Matt Matsunaga (District 9)
 - Representative Brian Yamane (District 19)
- Department of Business, Economic Development and Tourism:
 - * Land Use Commission
 - Energy, Resources and Technology Division
- Department of Land and Natural Resources:
 - * State Historic Preservation Division
- Department of Health:
 - * Environmental Planning Office
 - * Commission on Persons with Disabilities
 - * Office of Environmental Quality Control

University of Hawaii:
Environmental Center
Waikiki Aquarium

6.2.2 City and County Government

- Duke Bainum, Councilmember (District IV)
- * Board of Water Supply
 - * Department of Land Utilization
 - * Planning Department
 - * Department of Public Works
 - * Department of Transportation Services
 - * Department of Parks and Recreation:
Honolulu Zoo

6.2.3 Other Interested Parties

- American Lung Association
- * Hawaiian Electric Company, Inc.
GTE Hawaiian Telephone Company
Oceanic Cable
BHP Gas Company
 - * Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board No. 5
Waikiki Neighborhood Board No. 9
 - * Kapiolani Park Preservation Society
Sierra Club
The Outdoor Circle
 - * Kapiolani Park Advisory Council

6.2.4 Libraries

Hawaii State Library
University of Hawaii, Hamilton Library
Waikiki-Kapahulu Library

6.3 COMMENTS ON THE DRAFT EA

Comment letters received during public review of the Draft EA and responses prepared by the applicant have been included in **Appendix A**.

CHAPTER 7

REFERENCES

Belt Collins Hawaii, *East Mamala Bay Wastewater Facilities Plan Final Environmental Impact Statement*, prepared for the City and County of Honolulu, Department of Wastewater Management, December 1993.

Belt Collins Hawaii, *East Mamala Bay Final Wastewater Facilities Plan*, prepared for the City and County of Honolulu, Department of Wastewater Management, December 1993.

Belt Collins Hawaii, *Public Baths Force Main Replacement, Waikiki, Oahu, Hawaii, Final Environmental Assessment*, prepared for the City and County of Honolulu, Department of Wastewater Management, March 1996.

Engineering Concepts, Inc., *Public Baths Wastewater Pump Station Modification, (Pre-Final Draft) Preliminary Engineering Report*, prepared for the City and County of Honolulu, Department of Wastewater Management, May 1997.

Hawaii State, Department of Health, *Hawaii Administrative Rules*, Title 11, Chapter 42, "Vehicular Noise Control For Oahu", October 24, 1981.

Hawaii State, Department of Health, *Hawaii Administrative Rules*, Title 11, Chapter 43, "Community Noise Control For Oahu", October 24, 1981.

Hawaii State, Department of Health, *Hawaii Administrative Rules*, Title 11, Chapter 60.1, "Air Pollution Control", October 29, 1993.

Hawaii State, Department of Health, *Hawaii Administrative Rules*, Title 11, Chapter 200, "Environmental Impact Statement Rules", August 20, 1996.

R. M. Towill Corporation, *Spill Reduction Action Plan Engineering Report*, prepared for the City and County of Honolulu, Department of Wastewater Management, November 1995.

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APPENDIX A

DRAFT EA COMMENTS AND RESPONSES

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DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
850 SOUTH KING STREET
HONOLULU, HAWAII 96813



RECEIVED
AUG 26 1997
ENGINEERING CONCEPTS

KENNETH E. SPRAGUE, P.E., P.H.
DIRECTOR
CHERYL K. OKUMA SEFE
DEPUTY DIRECTOR

WPP 97-509

JEREMY HARRIS
SAVOR

ESTHER UEDA
EXECUTIVE OFFICER

RECEIVED
AUG 12 1997
ENGINEERING CONCEPTS



STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM
LAND USE COMMISSION

P.O. Box 2359
Honolulu, HI 96804-2359
Telephone: 808-587-3822
Fax: 808-587-3827

August 11, 1997

Mr. Sung Ho Lai
Department of Wastewater Management
City & County of Honolulu
650 South King Street, 14th Floor
Honolulu, Hawaii 96813

Dear Mr. Lai:

Subject: Draft Environmental Assessment (DEA) for the
Public Baths Wastewater Pump Station Modification,
Honolulu, Oahu. TMK 3-1-31: 7

We have reviewed the DEA for the subject project and find that the Public Baths Wastewater Pump Station and the proposed additional land (TMK 3-1-31: por. 4), as represented on Figures 2.1 and 2.5, respectively, of the DEA, are located within the State Land Use Urban District.

We have no further comments to offer at this time. We appreciate the opportunity to comment on the subject DEA.

Should you have any questions, please feel free to call me or Bert Saruwatari of our office at 587-3822.

Sincerely,

ESTHER UEDA
Executive Officer

EU:th

cc: Kenneth Ishizaki
OEQC

August 25, 1997

Ms. Esther Ueda, Executive Officer
Land Use Commission
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Dear Ms. Ueda:

Subject: Draft Environmental Assessment (EA) for
Public Baths Wastewater Pump Station
Modification Honolulu, Oahu, Hawaii
TMK: 3-1-31:7

Thank you for your letter of August 11, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and acknowledge your comment that the pump station and proposed additional land (TMK: 3-1-31: portion of 4) are located within the State Land Use Urban District. This information was inadvertently omitted from the Draft EA and will be included in the Final EA.

A copy of your comment letter and this response will also be included in the Final EA. Should you have any questions, please contact Sung Ho Lai of the Division of Planning & Service Control at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEFE
KENNETH E. SPRAGUE
Director

cc: Kenneth Ishizaki - Engineering Concepts, Inc.
Office of Environmental Quality Control

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DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
450 SOUTH KING STREET
HONOLULU, HAWAII 96813

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NOV 6 1997
ENGINEERING CONCEPTS



KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 97-690

November 4, 1997

Mr. Don Hibbard, Administrator
State Historic Preservation Division
Department of Land and Natural Resources
33 South King Street, 6th Floor
Honolulu, Hawaii 96813

Dear Mr. Hibbard:

Subject: Draft Environmental Assessment (EA) for Public Baths Wastewater Pump Station Modification. Honolulu, Oahu, Hawaii, TMK: 3-1-31:7

Thank you for your letter of September 18, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and meeting with our staff regarding the proposed modifications. A copy of the meeting minutes is enclosed for your review. In addition, we offer the following response to your comments:

1. An archaeological monitoring plan will be submitted for your review.
2. After meeting with our architectural consultant, it is our understanding that the proposed modifications to the two existing buildings meet with your approval.
3. We understand your concern regarding acquisition of the adjoining park area (2,000 sq. ft.) for the proposed pump station modification. We are currently in contact with the Kapiolani Park Preservation Society, which has similar concerns.

A copy of your comment letter and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEPE

KENNETH E. SPRAGUE
Director

Attachment

cc: / Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanaam, Office of Environmental Quality Control

97-1148
MICHAEL B. WILSON, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
DEPUTIES
GILBERT COLONIA-AGUIAR
AQUACULTURE DEVELOPMENT PROGRAM
AQUATIC RESOURCES CONSERVATION AND RESOURCES ENHANCEMENT COMMITTEES
FORESTRY AND WILDLIFE HISTORIC PRESERVATION DIVISION
LAND DIVISION
STATE PARKS
WATER AND LAND DEVELOPMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 6TH FLOOR
HONOLULU, HAWAII 96813

September 18, 1997

Mr. Kenneth Sprague
Department of Wastewater Management
City and County of Honolulu
650 South King Street, 14th Floor
Honolulu, Hawaii 96813

Dear Mr. Sprague:

SUBJECT: Draft Environmental Assessment
Public Baths Wastewater Pump Station Modification
TMK: 3-1-031:007, Honolulu, Oahu

Thank you for transmitting the Draft Environmental Assessment of the above project. We concur with the mitigation measures calling for a qualified archaeologist to monitor the construction activities and look forward to reviewing the monitoring plan. However, we have a few concerns regarding the proposed modification to the existing two buildings. Please have your staff call Tonia Moy at 587-0005 to set up a meeting to discuss these concerns. Thank you for the opportunity to comment.

Aloha,

DON HIBBARD, Administrator
State Historic Preservation Division

TM:ds

RECEIVED
97 SEP 23 P2:19
DEPT. OF WASTEWATER MANAGEMENT

DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF PLANNING & SERVICES
RECEIVED
97 SEP 23 P4:59

MEMORANDUM

Date: October 29, 1997
To: Files
From: Ken Ishizaki/Dana Yamamoto
Subject: Public Baths WWPS Modification Draft EA
Meeting at DLNR State Historic Preservation Division on September 29, 1997
Present: SHPD
Don Hibbard
Tonia Moy
WWM
Richard Leong
Sung Ho Lai
Anbe Aruga Ishizu Architects
Harold Inouye
ECI
Ken Ishizaki
Dana Yamamoto

The purpose of the meeting was to discuss SHPD concerns based on their review of the Draft EA for the project. The two main concerns were:

- (1) The pump building is over 50 years old and therefore, a historic structure. Efforts should be made to minimize alteration of the building.
- (2) Relocation of the fence (associated with land acquisition) will encroach into existing open space/park land.

Building Alteration Discussion:

- (1) Roof. The pump building roof is double-pitched, constructed of old clay tile with some breakage. The more-recently constructed generator building roof is Monier tile. The proposed modification will integrate the two roofs to achieve the same overall appearance. Modifications will consider the different roof lines.

Memorandum to Files
October 29, 1997
Page 2

Adjustment of the slopes will be required. The proposed roof reconstruction was acceptable to SHPD.

- (2) Building Connection. Connection of the buildings is necessary to create an enclosure to house new electrical equipment. There is insufficient space within the existing pump and generator buildings to house the new equipment.
- (3) Access Ramp and Railing. The ramp will facilitate removal of equipment from the pump building for maintenance, and meets ADA access requirement. The railing is required by ADA due to the ramp slope. ECI explained the difficulty in grading the exterior grounds up to the doorway to eliminate construction of a ramp.

Loss of Open Space Discussion:

- (1) The need for additional land was discussed. SHPD suggested that use of the paved area within the aquarium property on the Diamond Head side of the pump station site be considered. It was noted that the pump station piping is directed in the opposite direction (toward Waikiki).
- (2) The need to secure the site with a fence was discussed. The alternative to a fence would be to house equipment in enclosed underground vaults (as is presently done). Such facilities are now subject to strict regulations for confined spaces, which hinder operation and maintenance procedures.

Other Topics of Discussion:

Federal review is needed only if federal funding or permits are required (e.g. Army permit for construction within waters of the US). This project will not use federal funds. The need for a federal permit is not anticipated.

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0-5 9634

DOMINICK J. CAYTON
GOVERNOR OF HAWAII



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NOV 25 1997

ENGINEERING CONCEPTS, INC.

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 6TH FLOOR
HONOLULU, HAWAII 96813

November 19, 1997

Mr. Kenneth E. Sprague, Director
Department of Wastewater Management
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

LOG NO: 20559
DOC NO: 9711tm04
Architecture

Dear Mr. Sprague:

SUBJECT: Draft Environmental Assessment for Public Baths Wastewater Pump Station
Located in Kapiolani Park
TMK: 3-1-31:07, Honolulu, Oahu

Thank you for submitting a copy of the minutes of our meeting regarding the above subject. The minutes and your letter accurately reflect the concerns of our office. To reiterate, we concur with the architectural design of the building and currently there is no need for a Section 106 federal review since no construction will be within the waters nor will there be any use of federal funds. However, we would like to see more alternatives attempted to minimize the impact on the open space of Kapiolani Park.

Thank you for the opportunity to comment. Should you have further questions, please call Tonia Moy at 587-0005.

Aloha,

DON HIBBARD, Administrator
State Historic Preservation Division

TM:jik

c: Dana Yamamoto, Engineering Concepts Inc., 250 Ward Ave. #206, Hon. 96814

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JERRY W. WATSON
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA SEPE
DEPUTY DIRECTOR

WPP 98-309

June 3, 1998

Mr. Don Hibbard, Administrator
State Historic Preservation Division
Department of Land and Natural Resources
33 South King Street, 6th Floor
Honolulu, Hawaii 96813

Dear Mr. Hibbard:

Subject: Draft Environmental Assessment (EA) for
Public Baths Wastewater Pump Station Modification
Honolulu, Oahu, Hawaii
TMK: 3-1-31:7

The State Historic Preservation Division had previously expressed concern over the loss of 2,000 sq. ft. of park land associated with the proposed pump station modification. After careful reevaluation, the Department of Wastewater Management has decided to forego the previously proposed land acquisition for this project. The proposed pump station improvements will be constructed underground, outside of the pump station fence similar to the existing flow box presently located adjacent to the pump station. An easement from the Department of Land and Natural Resources will be sought for the construction of these underground facilities.

Revisions to the proposed project will be addressed in the Final Environmental Assessment, presently being prepared by our consultant. Should you have any questions, please contact Mr. Sung Ho Lai at the Division of Planning and Service Control at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEPE
KENNETH E. SPRAGUE
Director

cc: Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thiruganam, Office of Environmental Quality Control

0000 0023 2584

BENJAMIN J. CAYTELINO
GOVERNOR OF HAWAII



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

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SEP 15 1997

ENGINEERING CONCEPTS

LAWRENCE M. BIRK
DIRECTOR OF HEALTH

In reply, please refer to

September 9, 1997

97-168/epo

Mr. Sung Ho Lai
September 9, 1997
Page 2
97-168/epo

Control of Fugitive Dust

Fugitive dust concerns have been adequately addressed in the subject Draft Environmental Assessment. Construction activities must comply with the provisions of Hawaii Administrative Rules, Chapter 11-60.1, Section 11-60.1-33 on Fugitive Dust.

If you have any questions regarding fugitive dust, please contact Mr. Timothy Carvalho of the Clean Air Branch at 586-4200.

Wastewater

The subject project is located within the County sewer service system. We have no objections to the proposed modifications as long as wastewater generated at the time of construction and modification is handled properly.

All wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems." We reserve the right to review the detailed wastewater plans for conformance to applicable rules.

Should you have any questions regarding these comments, please contact Ms. Lori Kajiwara of the Wastewater Branch at 586-4294.

Water Pollution

The Clean Water Branch will address any concerns regarding the National Pollutant Discharge Elimination System (NPDES) permits necessary for the project during the application review process.

Any questions regarding these comments should be directed to Mr. Denis Lau, Branch Chief, Clean Water Branch at 586-4309.

Sincerely,

BRUCE S. ANDERSON, Ph.D.
Deputy Director for Environmental Health

- c: Engineering Concepts, Inc. ✓
- OEQC
- CAB
- IEB, Asbestos Abatement Office
- HWB
- CWB

Mr. Sung Ho Lai
Department of Wastewater Management
City & County of Honolulu
650 South King Street, 14th Floor
Honolulu, Hawaii 96813

Dear Mr. Lai:

Subject: DRAFT ENVIRONMENTAL ASSESSMENT (DEA)
Project: Public Baths Wastewater Pump Station Modification
Location: Honolulu, Oahu, Hawaii
TRK: (1) 3-1-31: 7

Thank you for allowing us to review and comment on the subject project. We have the following comments to offer:

Demolition Involving Asbestos

If the project entails demolition activities, the Federal Register, 40 CFR Part 61, National Emission Standard for Hazardous Air Pollutants, Asbestos NESHAP Revision; Final Rule, November 20, 1990, requires inspection of all affected areas to determine whether asbestos is present.

Under the NESHAP regulation, the project would be required to file an Asbestos Demolition/Renovation notification with the Department of Health's (DOH) Indoor Environment Branch ten working days prior to demolition of each building or the disturbance of regulated asbestos-containing material. All regulated quantities and types of asbestos-containing materials would be subject to emission control, proper collection, containerizing, and disposal at a permitted landfill.

If you have any questions regarding asbestos removal, please contact Mr. Robert H. Lopes of the Indoor Environment Branch, Asbestos Abatement Office at 586-5800.

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
150 SOULYMENG STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 97-687

November 4, 1997

Bruce S. Anderson, Ph.D.
Deputy Director for Environmental Health
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Dr. Anderson:

Subject: Draft Environmental Assessment (EA) for Public Baths Wastewater Pump Station
Modification, Honolulu, Oahu, Hawaii, TMK: 3-1-31-7. Reference: 97-168/epo.

Thank you for your letter of September 9, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

Demolition Involving Asbestos

To our knowledge, the areas of the pump station where modifications will take place contain no asbestos. We will contact your department if knowledge to the contrary evolves.

Control of Fugitive Dust

The construction documents will require the contractor to comply with provisions of Hawaii Administrative Rules, Chapter 11-60.1, Section 11-60.1-33.

Wastewater

The construction documents will require the contractor to maintain existing wastewater collection and transmission service throughout the construction period. The construction documents will be submitted to your department to review for conformance with the Department of Health Administrative Rules, Chapter 11-62.

Bruce S. Anderson, Ph.D.
Page 2
November 4, 1997

Water Pollution

We will submit all applicable National Pollutant Discharge Elimination System (NPDES) permit applications for the project during the design phase.

A copy of your comment letter and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEPE
KENNETH E. SPRAGUE
Director

cc: / Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

0000 0023 2585



COMMISSION ON PERSONS WITH DISABILITIES

919 Ala Moana Boulevard, Room 101 • Honolulu, Hawaii 96814
Ph. (808) 586-8121(V/TDD) • Fax (808) 586-8129

97-1531
PK

DEPARTMENT OF WASTEWATER MANAGEMENT
OFFICE OF PLANNING
& SERVICE CONTROL

August 27, 1997

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SEP 4 1997

ENGINEERING CONCEPTS

Department of Wastewater Management
City & County of Honolulu
650 South King Street, 14th Floor
Honolulu, Hawaii 96813

Attention: Mr. Sung Ho Lai


Subject: Public Baths Wastewater Pump Station Modifications
Honolulu, Oahu, Hawaii

Thank you for the opportunity to provide comments to the Draft Environmental Assessment to the above project. Following are comments to the proposed modifications:

- a) If the ramp to be installed is to have a running slope that is greater than 5% (1:20), then handrails and other appurtenances would be required according to the Americans with Disability Act Accessibility Guidelines (ADAAG).
- b) New doors that are to be added should be at least 3'-0" wide and have accessible hardware and thresholds.

Should you have any questions, feel free to call me at 586-8121.

Sincerely,


Ben Gorospe
Access Specialist

RECEIVED

DEPARTMENT OF WASTEWATER MANAGEMENT

CITY AND COUNTY OF HONOLULU

880 SOUTH KING STREET
HONOLULU, HAWAII 96813

SEP 11 1997

ENGINEERING CONCEPTS



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.

DIRECTOR

CHERYLE OLUNGA-REPE
DEPUTY DIRECTOR

WPP 97-547

September 9, 1997

Commission on Persons with Disabilities
919 Ala Moana Boulevard, Room 101
Honolulu, Hawaii 96814

Attention: Mr. Ben Gorospe, Access Specialist

Gentlemen:

Subject: Draft Environmental Assessment (EA) for Public Baths Wastewater
Pump Station Modification Honolulu, Oahu, Hawaii. TMK: 3-1-31:2

Thank you for your letter of August 27, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

- 1. The Final EA will be revised to state the exterior access ramp, including handrails and other appurtenances, will be designed in accordance with the Americans with Disability Act Accessibility Guidelines (ADAAG).
- 2. The new exterior doors to the pump room will be at least 3'-0" wide and have accessible hardware and thresholds in accordance with the ADAAG.

A copy of your comment letter and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,

KENNETH E. SPRAGUE
Director

cc: Kenneth Ishizaki - Engineering Concepts, Inc.
Office of Environmental Quality Control

0000 0023 2586

0000 0023 2587

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
630 SOUTH KING STREET
HONOLULU, HAWAII 96813



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SEP 19 1997
ENGINEERING CONCEPTS

KENNETH E. SPRAGUE, P.E., P.E.
DIRECTOR
CHERYL K. OKUMA, SEPE
DEPUTY DIRECTOR

WPP 97-573

JEREMY HARRIS
MAYOR

September 17, 1997

Mr. Gary Gill, Director
Office of Environmental Quality Control
236 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Subject: Draft Environmental Assessment (EA) for
Public Baths Wastewater Pump Station Modification
Honolulu, Oahu, Hawaii
TMK: 3-1-317

Thank you for your letter of September 5, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

1. A pump station capacity test conducted in September 1996 determined approximately 1.6 MGD could be conveyed with two pumps in operation. This information will be included in the Final EA.
2. A copy of the Draft EA was transmitted to the State Historic Preservation Division (SHPD) for their review. We are still waiting for SHPD to submit their comments. The Final EA will include all pertinent information provided by SHPD.
3. A report "Preliminary Cost-Effectiveness Assessment, Preliminary Basin Reports, Sewer Rehabilitation and Infiltration and Inflow Minimization Plan" was prepared for the City by Fukunaga & Associates, Inc. in December 1995. This report determined that rehabilitation of the Public Baths WWPS collection system was not cost effective. The City created a pilot project in Enchanted Lake, Kailua to test the effectiveness of various rehabilitation methods for the collection system sewer line. The observation and monitoring so far have indicated that rehabilitation of the City's collection lines produced negligible reduction in infiltration and inflow. This study is ongoing, and more information will be analyzed. The infiltration and inflow is not a major problem in the Public Baths collection system in comparison with some other collection systems. The current plan is to design the system to transport the design flow with no rehabilitation to reduce the infiltration and inflow at Public Baths collection system.

97-1072
S. of p. 9-17-97
97-1573
RC

GARY GILL
DIRECTOR

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97 SEP 10 A6 58

DEPT. OF
WASTEWATER
MANAGEMENT



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
236 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186

September 5, 1997

Mr. Kenneth E. Sprague, Director
Honolulu Department of Wastewater Management
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Sprague:

Subject: Draft Environmental Assessment for the Public Baths
Wastewater Pump Station Modification

Thank you for the opportunity review the subject document. We have the following comments and questions.

1. The pump station capacity will be increased to meet the future design flow of 3.2 mgd. What is the existing capacity of the pump station?
2. The original pump station was built 53 years ago. Is there any historic significance attached to the existing pump station?
3. Please describe the measures that will be taken to reduce infiltration and inflow within the pump station's service area.
4. The DMMM proposes to acquire 2,000 square feet of adjacent Kapiolani Park land from the State Department of Land and Natural Resources. According to the environmental assessment, there is a potential conflict in ownership of the subject park parcel since the Kapiolani Park Trust is also claiming its ownership. Please describe how this issue will be resolved prior to the land acquisition.

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

Sincerely,
Gary Gill
Director

Mr. Gary Gill
Page 2
September 17, 1997

4. The Department of Wastewater Management is proceeding with efforts to clarify land ownership in an effort to resolve this issue. The City has requested the State Attorney General's Office to render an opinion on the ownership status, and the City's Corporation Counsel is studying the case in an effort to determine the ownership of the subject parcel of land. The City Department of Public Works, Division of Land Survey and Acquisition has contacted State Department of Land and Natural Resources for the acquisition of the subject parcel. However, if Kapiolani Park Trust is determined to be the owner, the City will negotiate with the Kapiolani Park Preservation Society for the proposed land acquisition.

A copy of your comment letter and this response will also be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,



KENNETH E. SPRAGUE
Director

cc: Kenneth Ishizaki - Engineering Concepts, Inc.

0000 0023 2588

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96843
PHONE (808) 527-6180
FAX (808) 533-2714



September 16, 1997

COPY

JEREMY HARRIS, Mayor
WALTER O. WATSON, JR., Chairman
MAURICE H. YAMAGATO, Vice Chairman
KAZUO HAYASHIDA
MELISSA Y. J. LIU
FORREST C. MURPHY
JONATHAN K. SHIMADA, PhD
BARBARA IOMI STATION
RAYMOND H. SATO
Manager and Chief Engineer

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SEP 18 1997

ENGINEERING CONCEPTS

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

ATTN: SUNG HO LAI
FROM: **FOR** RAYMOND H. SATO, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR LETTER OF AUGUST 8, 1997 ON THE DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION, HONOLULU, OAHU, HAWAII. TMK: 3-1-31: 07

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the renovation of the wastewater pump station.

We have the following comments to offer:

1. The existing off-site water system cannot provide adequate fire protection in accordance with our Water System Standards. Our standards require a fire hydrant to be located within 125 linear feet (l.f.) of the site. The nearest hydrant is located approximately 350 l.f. away. The applicant will therefore be required to install a fire hydrant in the vicinity of the proposed project. The construction drawings should be submitted for our review and approval.
2. The availability of water will be determined when the Building Permit Application is submitted for our review and approval. If water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.
3. There is one domestic 5/8-inch water meter currently serving the project site.
4. A Board of Water Supply approved reduced pressure principle backflow prevention assembly is required to be installed immediately after all domestic water meters serving the project site prior to any fees or branches.

If you have any questions, contact Barry Usagawa at 527-5235.

cc: Engineering Concepts, Inc.
Office of Environmental Quality Control

**DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU**

830 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

November 4, 1997

WPP 97-689

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NOV 7 1997

ENGINEERING CONCEPTS

MEMORANDUM

TO: MR. RAYMOND H. SATO, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT
CHERYL K. OKUMA-SEPE

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION, HONOLULU, OAHU, HAWAII. TMK: 3-1-31:7

Thank you for your memorandum of September 16, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments:

1. We will continue to meet with your staff during the design stage to discuss installation of a fire hydrant in the vicinity of the proposed project.
2. We understand that availability of water will be determined when the Building Permit application is submitted. It is our understanding that there will be no significant increase in water demand over the current use.
3. We understand that there is one domestic 5/8-inch water meter currently serving the project site.
4. We intend to conform to the applicable regulations of the Board of Water Supply.

A copy of your correspondence and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

cc: ✓ Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

0000 0023 2589

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU
930 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE (808) 523-4114 • FAX (808) 527-8743

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SEP 9 1997

ENGINEERING CONCEPTS



JAN NAOE SULLIVAN
DIRECTOR

LORETTA K.C. CHEE
DEPUTY DIRECTOR
97-05673 (DT)

'97 EA Comments Zone 3

September 8, 1997

JEREMY MARBLE
MAYOR

MEMORANDUM

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

FROM: JAN NAOE SULLIVAN, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

SUBJECT: COMMENTS TO DRAFT ENVIRONMENTAL ASSESSMENT (EA)
PUBLIC BATHS WASTEWATER PUMP STATION (WPPS) MODIFICATION
TAX MAP KEYS: 3-1-31: 04 and 07

We have reviewed the above Draft EA and have the following comments:

Special Management Area

1. The EA correctly notes that the project is within the Special Management Area and that a Special Management Area Use Permit (SMP) will be required prior to construction.
2. A map showing the project location in relation to the shoreline should be included in the Final EA. What is the distance of the project from the shoreline? If the project is less than 55 feet from the shoreline, a current certified shoreline survey will be required as part of the SMP application.
3. The height of the proposed WPPS should be included in the "Proposed Action" section of the EA.
4. A coastal view section should be added to the Final EA. This section should provide a visual analysis and describe coastal views from surrounding public viewpoints and views of the ocean from Kalakaua Avenue and Kapiolani Park.

KENNETH E. SPRAGUE, DIRECTOR
Page 2
September 8, 1997

5. Describe the project site in relation to rare, threatened, or endangered species of animals and their habitats, and also wildlife and wildlife preserves.

6. Page 3-13 of the EA mentions that a written archaeological monitoring plan will be prepared and submitted to the State Historic Preservation Division for review and acceptance. A copy of this mitigation plan should be submitted with the SMP application.

7. The Final EA should describe the method of treatment and discharge that will be used for construction dewatering.

Diamond Head Special District (DHSD)

1. A minor DHSD Permit will be required prior to construction.
2. The following should be submitted as part of the DHSD Permit application:
 - a. A plot plan indicating the property lines, required yards, building height, fencing material and height, existing tree location (size, spread and height); and
 - b. Landscape plan.
3. Work which may affect "significant trees", such as ironwood trees in the area, must be clearly identified in the DHSD application material.

Consolidation/Subdivision Application

 1. In the EA, there is a section titled, "Permits and Approvals Required" from various government agencies. A Consolidation/Resubdivision application is also required from the Department of Land Utilization, and should be mentioned in this section.
 2. The Final EA should note that the project involves the consolidation of the parcel identified by Tax Map Key: 3-1-31: 4.

KENNETH E. SPRAGUE, DIRECTOR
Page 3
September 8, 1997

Waiver of Public Uses

1. Page 3-5 of the EA mentions that variances may be required to comply with land use development standards. A waiver of the development or design standards is required, not a variance. The Final EA should be corrected to say that a waiver of public uses will be required. Waivers are approved by the Director of Land Utilization.
2. A waiver will be required for the following:
 - a. Exceeding the maximum building area (5 percent of the zoning lot) allowed for P-2 General Preservation District; and
 - b. Constructing into the 30-foot front yard setback and 15-foot side yard setback.

Thank you for the opportunity to comment. If you have any questions regarding the DHS permit application, please contact Mr. Anthony Ching of our staff at 527-5833. Please contact our Subdivision Branch at 527-5838 if you have questions regarding the Consolidation/Subdivision application. If you have any questions regarding the waiver application, please contact our Zoning Adjustments Branch at 523-4135. Ms. Dana Teramoto of our staff can answer any questions regarding the SHP at 523-4648.

JAN NAOE SULLIVAN
Director of Land Utilization

JNS:am

cc: ✓ Engineering Concepts, Inc., Kenneth Ishizaki
Office of Environmental Quality Control

8:04d1p0w092.4/1

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
850 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
Mayor

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPPP 97-645

November 4, 1997

RECEIVED

NOV 7 1997

ENGINEERING CONCEPTS

MEMORANDUM

TO: MS. JAN NAOE SULLIVAN, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT
CHERYL K. OKUMA-SEPE

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR
PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION,
HONOLULU, OAHU, HAWAII. IMK. 3-1-31:7

Thank you for your memorandum of September 8, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

Special Management Area

1. No response required.
2. The project site is located approximately 214 feet from the shoreline. This distance is reflected on several of the Draft EA figures, albeit at a small scale (1"=1000'). It is our understanding that a certified shoreline survey is not required because the project is more than 55 feet from the shoreline.
3. The Final EA will include a statement in the "Proposed Action" section that the WWPS building height will be approximately 18 feet at the highest point along the roof line.
4. A discussion of the coastal view will be added to the Final EA.
5. There are no known rare, threatened or endangered species of animals or habitats for such animals naturally occurring in the vicinity of the project site. The Honolulu Zoo is located within the WWPS service zone, approximately 1,500 feet away from the project site. However, the proposed project will not have a negative impact on any rare, threatened or endangered species of animal residing within the zoo.
6. A copy of the proposed archaeological monitoring plan will be included with the SMP application. Written acceptance of the archaeological monitoring plan will be forwarded to DLU upon receipt from SHPD.

Ms. Jan Naoe Sullivan
Page 2
November 4, 1997

7. The method of treatment and discharge for construction dewatering will be addressed in the NPDES permit application. It is premature to describe best management practices (BMPs) to be employed during construction dewatering at this time. Appropriate BMPs will be addressed in the NPDES permit application to the State Department of Health which is prepared in association with the design of the project later.

Diamond Head Special District (DHSD)

1. We acknowledge that a minor DHSD permit will be required.
2. The DHSD permit application will include a plot plan and landscaping plan.
3. The DHSD permit application will identify "significant trees" in the area.

Consolidation/Subdivision Application

1. We will include Consolidation/Resubdivision application in the list of "Permits and Approvals Required" in the Final EA.
2. The Final EA will reflect consolidation of a portion of the parcel identified by TMK: 3-1-31: 4.

Waiver of Public Uses

1. We will correct the document to state that a waiver of the development or design standards is required, not a variance.
2. We understand that the waiver will be required for exceeding the maximum building area allowed for P-2 General Preservation District and constructing into the 30-foot front yard setback and 15-foot side yard setback.

A copy of your correspondence and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

cc: ✓ Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thiruganam, Office of Environmental Quality Control

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
450 SOUTH KING STREET
HONOLULU HAWAII 96813



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE, EEO
DEPUTY DIRECTOR

WPP 98-332

June 16, 1998

MEMORANDUM

TO: MS. JAN NAOE SULLIVAN, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT
CHERYL K. OKUMA-SEPE

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR
PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION,
HONOLULU, OAHU, HAWAII
TMK: 3-1-31:7

This memorandum is a follow-on to our memorandum WPP 97-685, dated November 4, 1997, same subject. After careful reevaluation, the Department of Wastewater Management has decided to forego the previously proposed land acquisition for this project. The proposed pump station improvements will be constructed underground, outside of the pump station fence, similar to the existing flow tube box presently located adjacent to the pump station.

Therefore, we need to update our response to your comments on the Draft EA regarding "Consolidation/Subdivision Application" dated September 8, 1997. Since land will not be acquired, there will be no need to reflect consolidation of the parcel identified by TMK: 3-1-31:4 or list Consolidation/Resubdivision application in the list of "Permits and Approvals Required" in the Final EA.

Revisions to the proposed project will be addressed in the Final EA, presently being prepared by our consultant. Should you have any questions, please contact Mr. Sung Ho Lai of the Division of Planning and Service Control at 527-5398.

cc: ✓ Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thiruganam, Office of Environmental Quality Control

DEPARTMENT OF PLANNING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 6TH FLOOR • HONOLULU, HAWAII 96813-3017
PHONE: (808) 523-4711 • FAX: (808) 523-4990



RECEIVED

AUG 27 1997

ENGINEERING CONCEPTS

JEREMY HARRIS
MAYOR

PATRICK T. ONISHI
CHIEF PLANNING OFFICER
DORAL L. HAMAUE
DEPUTY CHIEF PLANNING OFFICER

TH 8/97-1636

August 26, 1997

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

ATTENTION: SUNG HO LAI

FROM: 
PATRICK T. ONISHI
CHIEF PLANNING OFFICER


SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR
THE PUBLIC BATHS WASTEWATER PUMP STATION
MODIFICATION, HONOLULU, OAHU, HAWAII,
TAX MAP KEY: 3-1-31:7

In response to your notice dated August 8, 1997, we have reviewed the subject draft EA and offer the following comments.

1. We have no objections to the proposed project. The proposed project is consistent with the objectives and policies of the General Plan and Primary Urban Center Development Plan (DP).
2. The proposed project involves upgrading the Public Baths Pump Station and replacement of approximately 3,400 linear feet of an existing sewer line along portions of Kaliakaua Avenue and Ohua Avenue. We have determined that the proposed project is minor because the proposed improvements would not significantly increase the system capacity; expand the service area; change the function of the existing facility; or permit significant new development or redevelopment. Therefore, an amendment to the Primary Urban Center DP Public Facilities Map will not be required.

Should you have any questions, please contact Tim Hata of our staff at 527-6070.

PTO:js

cc:  Engineering Concepts, Inc.
Office of Environmental Quality Control

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

ENGINEERING CONCEPTS

KENNETH E. SPRAGUE, P.E., P.L.
DIRECTOR

CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 97-541

September 8, 1997

MEMORANDUM


TO: MR. PATRICK T. ONISHI, DIRECTOR
PLANNING DEPARTMENT

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT
CHERYL K. OKUMA-SEPE

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR
PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION,
HONOLULU, OAHU, HAWAII, TMK. 3-1-31:7

Thank you for your memorandum of August 26, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and acknowledge your comments that the project is consistent with the objectives and policies of the General Plan and Primary Urban Center Development Plan (DP), and that an amendment to the Primary Urban Center DP Public Facilities Map will not be required.

A copy of your correspondence and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

cc:  Kenneth Ishizaki - Engineering Concepts, Inc.
Office of Environmental Quality Control

0000 0023 2593

0000 0023 2594

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU
830 SOUTH KING STREET
HONOLULU, HAWAII 96813

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AUG 29 1997
ENGINEERING CONCEPTS

JONATHAN K. SHIMADA, PHD
DIRECTOR AND CHIEF ENGINEER
ROLAND D. LUMBY, JR.
DEPUTY DIRECTOR
ENV 97-173

JEREMY HARRIS
MAYOR

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
830 SOUTH KING STREET
HONOLULU, HAWAII 96813



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SEP 11 1997

ENGINEERING CONCEPTS
KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL R. OKUMA-REPE
DEPUTY DIRECTOR

August 26, 1997

September 9, 1997

WPP 97-546

MEMORANDUM:

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

FROM: JONATHAN K. SHIMADA, PHD
DIRECTOR AND CHIEF ENGINEER *JK Shimada*

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (DEA)
PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION
TMK: 3-1-31: 7

MEMORANDUM

TO: DR. JONATHAN K. SHIMADA, DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF PUBLIC WORKS

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR PUBLIC
BATHS WASTEWATER PUMP STATION MODIFICATION,
HONOLULU, OAHU, HAWAII. TMK: 3-1-31:7

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

1. The DEA should adequately address water quality issues.
 2. The DEA should discuss potential impact of spills or leakage of pipe(s) in this heavily-used beach park area and what provisions can be made to mitigate such impact.
 3. The DEA should also describe what kind of best management practices (BMPs) will be employed during the construction dewatering and hydrotesting.
- If you have any questions, please contact Alex Ho, Environmental Engineer, at Local 4150.

cc: OEQC
Engineering Concepts, Inc.

Thank you for your memorandum of August 26, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

1. To our knowledge, the only water quality issues associated with the proposed project are construction-related. Protection of water quality will be addressed during preparation of NPDES permit applications for construction dewatering and hydrotesting discharges.
2. The Final EA will include a section on the potential impact of spills or pipe leakage and appropriate mitigation. A Spill Reduction Action Plan (SRAP) was prepared in November 1995. The report addressed the following: assessment of the existing spill situation; spill prevention activities and spill response plans. The report concluded the spill urgency ranking for the Public Baths WWPS was "low". Spill prevention and response during construction will be addressed in a mitigation plan to be prepared by the contractor and will require approval of the Department of Wastewater Management.
3. It is premature to describe best management practices (BMPs) to be employed during construction dewatering and hydrotesting at this time. Appropriate BMPs will be addressed in the NPDES permit applications which will be prepared in association with design and construction of the project.

A copy of your correspondence and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

cc: ✓ Kenneth Ishizaki - Engineering Concepts, Inc.
Office of Environmental Quality Control

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
PACIFIC PARK PLAZA • 711 KAPOLANI BOULEVARD, SUITE 1200 • HONOLULU, HAWAII 96813
PHONE: (808) 532-4329 • FAX: (808) 532-4790



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SEP 10 1997

ENGINEERING CONCEPTS

JEREMY HARRIS
MAYOR

CHERYL D. SOON
DIRECTOR
JOSEPH M. MAGALOK, JR.
DEPUTY DIRECTOR

September 8, 1997

TSP8/97-04140R

MEMORANDUM

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

ATTN: SUNG HO LAI

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION

In response to your August 8, 1997 letter, the draft environmental assessment for the subject project was reviewed. This document includes a discussion of the traffic impacts of the proposed project. Construction plans for all work within the City's street right-of-way should be submitted to this department for review and approval. A traffic control plan, as required, should also be submitted for review and approval prior to obtaining a street usage permit.

Should you have any questions regarding this matter, please call Faith Miyamoto of the Transportation System Planning Division at Local 6976.

cc: Mr. Kenneth Ishizaki
Engineering Concepts, Inc.
OEQC


for CHERYL D. SOON

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
890 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., P.O.
DIRECTOR
CHERYL E. OOKAMASE
DEPUTY DIRECTOR

WPP 97-686

November 4, 1997

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NOV 7 1997

ENGINEERING CONCEPTS

MEMORANDUM

TO: MS. CHERYL D. SOON, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

CHERYL K. OKUMA-SEPE

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR
PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION,
HONOLULU, OAHU, HAWAII. JMK: 3-1-31-7 TSP8/97-04140R

Thank you for your memorandum of September 8, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document. Construction plans will be submitted to your department for review and approval during the design phase of the project. We will coordinate with the Transportation System Planning Division during the preparation of the traffic control plan for work within the City's street right-of-way.

A copy of your correspondence and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

cc: / Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



WILLIAM D. BALFOUR, JR.
ACTING DIRECTOR

RONALD T. MOI
DEPUTY DIRECTOR

Kenneth E. Sprague
Page 2
September 15, 1997

Please have your staff contact Mr. Daniel Takamatsu, Chief of our Facilities Development Division, at extension 6301 if you need further information.

RECEIVED

SEP 17 1997

ENGINEERING CONCEPTS

For WILLIAM D. BALFOUR, JR.
Acting Director

WDB:ei

cc: ✓ Engineering Concepts, Inc.
Office of Environmental Quality Control

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

FROM: WILLIAM D. BALFOUR, JR., ACTING DIRECTOR

SUBJECT: KAPIOLANI REGIONAL PARK
PUBLIC BATHS WASTEWATER PUMP STATION MODIFICATION
HONOLULU, OAHU, HAWAII
TAX MAP KEY 3-1-031:007

We have reviewed the above-described project and welcome the increased capacity and reduced noise level resulting from this work. However, we recommend that you contact the Kapiolani Park Preservation Society for their comments. Additional comments are as follows.

Modifications to the pump station structure should reflect a "Hawaiian-Victorian" theme compatible with that of Kapiolani Regional Park, including the color scheme.

Problems with sewerage backup at the Waikiki Shell/Royal Hawaiian Band facilities should be addressed.

Through traffic along Kalakaua Avenue should be maintained during construction.

0000 0023 2597

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
850 SOUTH KING STREET
HONOLULU HAWAII 96813



JEREMY HARRIS
SAYON

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 97-688

November 4, 1997

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NOV 7 1997
ENGINEERING CONCEPTS

MEMORANDUM

TO: MR. WILLIAM D. BALFOUR, JR., DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT
CHERYL K. OKUMA-SEPE

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR PUBLIC
BATHTS WASTEWATER PUMP STATION MODIFICATION,
HONOLULU, OAHU, HAWAII. TMK: 3-1-31:7

Thank you for your memorandum of September 15, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

- (1) We have been in contact with the Kapiolani Park Preservation Society to solicit their input on this project.
- (2) Our architectural consultant has been in contact with the State Historic Preservation Division to discuss the appropriate architectural scheme.
- (3) We recognize that there is a sewage backup problem at the Waikiki Shell. However, this problem is a separate issue that will be addressed in another project.
- (4) We will submit traffic control plans to the Department of Transportation Services for their approval for any work within the City's street right-of-way.

A copy of your correspondence and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

cc: ✓ Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

Hawaiian Electric Company, Inc. • PO Box 2750 • Honolulu, HI 96840-0001



Patricia Uyehara Wong, Esq.
Manager
Environmental Department

RECEIVED
SEP 15 1997
ENGINEERING CONCEPTS

September 11, 1997

Department of Wastewater Management
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, HI 96813
Attention: Mr. Sung Ho Lai

Dear Mr. Lai

Subject: Public Baths Wastewater Pump Station Modification

Thank you for the opportunity to comment on your December 1996 Draft EA for the Public Baths Wastewater Pump Station Modification, as proposed by the Department of Wastewater Management. We have reviewed the subject document and have the following comments:

- The pumping station may require special motor-startup equipment, depending upon the size of the motors.
- The 16" sewer line will be in conflict with the HECO underground facilities depending upon the construction methods.

Our point of contact for this project, and the originator of these comments, is Bill Muench (543-5657) senior customer engineer. I suggest your staff and consultants deal directly with Bill to coordinate HECO's continuing input on this project.

Sincerely,

cc: OEQC

Engineering Concepts, Inc.
250 Ward Avenue, Suite 206
Honolulu, HI 96814
Attn: Mr. Kenneth Ishizaki

B. Muench

WINNER OF THE EDISON AWARD
FOR DISTINGUISHED INDUSTRY LEADERSHIP



DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 97-691

November 4, 1997

Ms. Patricia Uyehara Wong, Esq.
Manager
Environmental Department
Hawaiian Electric Company, Inc.
P.O. Box 2750
Honolulu, Hawaii 96840-0001

Dear Ms. Wong:

Subject: Draft Environmental Assessment (EA) for Public Baths Wastewater Pump Station Modification. Honolulu, Oahu, Hawaii. TMK: 3-1-31-7

Thank you for your letter of September 11, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments. As suggested, our electrical consultant contacted Mr. Bill Muench of your staff. We will continue to coordinate your organization's input through this environmental assessment stage and the design stage (to follow).

1. The proposed pumps are 15 HP. Mr. Muench noted that no special motor-startup equipment would be required.
2. The 16-inch force main is currently under construction. Work has been coordinated with Hawaiian Electric Company, Inc. to avoid any conflicts with your underground facilities.

A copy of your comment letter and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEPE

KENNETH E. SPRAGUE
Director

cc: Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thiruganam, Office of Environmental Quality Control

0000 0023 2598



DIAMOND HEAD/KAPAHULU ST. LUXIS NEIGHBORHOOD BOARD NO. 5

RECEIVED 97 AUG 29 P3 54

August 29, 1997

Mr. Ken Sprague, Director
Department of Wastewater Management
City and County of Honolulu
650 South King Street, 14th Floor
Honolulu Hawaii 96813

DEPT. OF
WASTEWATER
MANAGEMENT

Via Facsimile Only to 527 6675

Subject: Public Baths Wastewater Pump Station Modification (Draft Environmental Assessment)

Dear Mr. Sprague:

At our meeting of August 14, 1997, the Diamond Head/Kapahulu/St. Louis Neighborhood Board No. 5 received a copy of the DEA for the above referenced project. We have been informed that the deadline for comments pertaining to the DEA is September 8, 1997.

However, as the Board has only regularly scheduled monthly meetings and review of such matters is referred to committee, the Board's comments subsequent to committee review of the DEA will not be available until October. The Board voted in favor requesting an extension to the September 8 deadline for comments on the DEA. Further, a presentation on the project by Mr. James Tanaka of DWWM will not be made to the Board until September 11.

Therefore, we respectfully request that the Department of Wastewater Management of the City and County of Honolulu, and their consultant for the above DEA, Engineering Concepts, Inc., extend the deadline for the comment period until November 8, 1997. This should allow sufficient time for the Board to review and comment on the above development.

We look forward to receiving a response to this request at your earliest opportunity. Your reply can be faxed to me at 732-7329. Thank you for the consideration of our need for adequate time to provide comprehensive comments on the proposed project.

Your assistance in this matter would be greatly appreciated.

Very truly yours,

Karen Ah Mai

Karen Ah Mai, Chair

cc: Mr. Kenneth Ishizaki, Engineering Concepts, Inc.
Mr. Sung Ho Lai, Dept. of Wastewater Management, C&C of Honolulu
Mr. Gary Gill, Office of Environmental Quality Control



88-28-97 81:86PM TO 5276875

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



RECEIVED

SEP 23 1997

ENGINEERING CONCEPTS

JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA, SEPE
DEPUTY DIRECTOR

WPP 97-563

September 19, 1997

Ms. Karen Ah Mai, Chair
Diamond Head/Kapahulu/St. Louis Heights
Neighborhood Board No. 5
c/o Neighborhood Commission
City Hall, Room 400
Honolulu, Hawaii 96813

Dear Ms. Ah Mai:

Subject: Public Baths Wastewater Pump Station Modification
Draft Environmental Assessment

We have received your letter of August 29, 1997 requesting an extension of the deadline for the review comments on the Draft Environmental Assessment (DEA) to November 8, 1997. We understand that the additional time is needed for the review by your committee and approval by the Neighborhood Board prior to the submittal, and that the Board only meets once a month which results in longer turn around time for the review process. Please be advised that the presentation by WWM on September 11, 1997 which you cited is for another project (Beachwalk Pump Station) and should not have any impact on the subject DEA for the Public Baths Pump Station.

You have indicated that it may be possible to have your review comments approved at your October 9, 1997 meeting. If you can return your review comments by October 15, 1997 we will appreciate it greatly. We thank you for your effort to cut down the additional time requirement that will help us move this project forward.

If there are any questions, please contact Sung Ho Lai of the Division of Planning and Service Control at 527-5398.

Sincerely,

KENNETH E. SPRAGUE
Director

cc: Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

0000 0023 2599



DIAMOND HEAD KAPAHULU: ST. LOUIS HEIGHTS NEIGHBORHOOD BOARD NO. 5

• • NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 400 • HONOLULU, HAWAII 96813

**PUBLIC BATHS WASTEWATER PUMP STATION
DRAFT ENVIRONMENTAL ASSESSMENT**

October 20, 1997

Mr. Kenneth E. Sprague, Director
Department of Wastewater Management
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Mr. Gary Gill, Director
Office of Environmental Quality Control
State Office Tower, Suite 702
235 South Beretania Street
Honolulu, Hawaii 96813

Mr. Sung Ho Lai
Division of Planning and Service Control
Department of Wastewater Management
650 South King Street, 14th Floor
Honolulu, Hawaii 96813

Mr. Kenneth Ishizaki
Engineering Concepts, Inc.
250 Ward Avenue, Suite 206
Honolulu, Hawaii 96814

RECEIVED

OCT 29 1997

ENGINEERING CONCEPTS

Subject: Public Baths Wastewater Pump Station Draft Environmental Assessment

Gentlemen:

Enclosed please find our response to the Draft Environmental Assessment for the proposed Public Baths Wastewater Pump Station Project.

You will find that our questions and comments focus on project impact on park lands; absence of data on historic significance, Trust provisions and Court orders; environmental impacts on significant viewplanes, air and noise quality, future shoreline water quality; and ultimately lack of disclosure of impacts of the larger project on lands included on the Register of Historic Places and protected under trust provisions.

As there appears to be sufficient reason to expect significant adverse impacts from the placement and operation this proposed segment of the larger project, we request that a full Environmental Impact Statement be provided for this segment of the cumulative development should the City wish to continue proposing this project for this location.

We look forward to your response on the attached questions, comments and concerns.

Very truly yours,

Karen Ah Mai

Karen Ah Mai, Chairperson
Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board #5

Joseph A. Kinoshita

Joseph A. Kinoshita, Chair
Planning and Zoning Committee

Michelle Spalding Matson

Michelle Spalding Matson, Chair
Parks and Recreation Committee

cc: Kapiolani Park Trustees
Kapiolani Park Advisory Council

CUMULATIVE DEVELOPMENT

QUESTION #1:

On or about August 15, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board received a Draft Environmental Assessment (DEA) on the Public Baths Wastewater Pump Station expansion proposed for Kapiolani Park lands. We strongly suggest that a full Environmental Impact Statement be conducted on this proposal and its related segments.

It is apparent that the environmental impacts associated with the Public Baths Wastewater Pump Station modification project have been segmented from the environmental impacts associated with the Waikiki Baths Force Main/Sewer Pipe Replacement (Final Environmental Assessment of March, 1996) and the Waikiki Beachwalk/Ala Wai Park and Golf Course Alternatives Wastewater Pump Station project (as first presented to the Board's meeting of September 11, 1997). The handout for the Beachwalk Wastewater Pump Station Project clearly illustrates the three segments of the cumulative project as phased together (See: BWSPS handout map, page 9).

The cost of the three segments together totals an estimated \$29.2 million to \$44.2 million in taxpayer dollars. In addition, matching federal low-interest loan program funding has been applied for and is expected to be executed by the state this month for the Public Baths Force Main segment of this cumulative project.

Further, the DEA states that "The (existing 12-inch) force main replacement will precede the (Public Baths) pump station modification, that "the proposed pump station modification will be closely coordinated with the Public Baths Force Main Replacement Project which is presently under construction...", and that the scope of the proposed project will include "interconnection of the existing 12-inch force main to the new 16-inch force main..." midway from the Public Baths pump station on Kalakaua Avenue to the terminus on Ohua Street in Waikiki. In addition, the DEA provides as part of the project scope an illustration of the two interconnected segments of the larger project as shown and described on in Figure 2.4. (1-1, 2-4 and 2-6)

Moreover, the East Māmala Bay Wastewater Facilities Plan Environmental Impact Statement (EMBWFP) of December, 1993, defines only "Conceptual Development Alternatives", and fails to document or discuss the incremental impacts of the proposed project segments on immediate surroundings, including, but not limited to, the impacts of the Public Baths Wastewater Station expansion on park land recreation areas, areas and buildings protected under the Register of Historic Places, and areas owned by and subject to the provisions of the Kapiolani Park charitable trust.



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QUESTION #3:

Kapiolani Park was placed on the Hawaii State Register of Historic Places in 1992, and as such is rendered eligible for the National Register of Historic Places. With such standing as a protected historic site and landscape, Kapiolani Park is subject to the provisions of the National Historic Preservation Act (NHPA). Consequently, the proposed pump station project may fall subject to a federal NHPA Section 106 Review action (36 CFR Part 800).

The DEA acknowledges that the proposed project "will consist of integrating the existing pump and generator buildings into one building... expanding the generator building on the northwest (Trust park land) side... merge the pump building and generator building, unifying the appearance of the two separate structures into one. The roof lines will be aligned and new roofing (similar to the existing) material will be used over the whole building." Figures 3-6, 3-7, and 3-8 show that the original stand-alone pump station building's architectural integrity is obliterated with attached structures. (3-14 through 3-17)

Is the City and County of Honolulu prepared to consider alternatives to the Public Baths pump station expansion upon assessment of effects of the project under a federal Section 106 Review?

LAND USE

QUESTION #4:

The project proposes a taking of 2,000 square feet of Kapiolani Park lands that are claimed to be needed for expansion and upgrade of an existing outdated pump station facility. This taking of public park land would appear to be illegal in that Kapiolani Park lands are held under charitable Trust provisions that protect the land in perpetuity as a park for the people of Honolulu. Such charitable Trust provisions supersede city, state and federal legislation, and the provisions of the Trust must remain in tact, as was held by the U.S. Supreme Court in 1819 (Dartmouth College Trust vs. Woodward) and upheld by the Hawaii State Supreme Court in 1988 in its decision pertaining to the Kapiolani Park/Burger King case.

The DEA states that "there are no measures proposed to mitigate the land acquisition. The area in question is located adjacent to the existing pump station and not a prime area for park users." (3-2) Conversely, the DEA acknowledges that "...the Public Baths Beach Park, located adjacent to the project site... is utilized by beachgoers and picnickers." (3-18)

In 1991, Judge Klein ruled in Circuit Court that, according to state and federal environmental law, all segments of the larger project, known as a cumulative development, must be addressed in environmental assessments and impact statements as the larger project. Thus it can be more correctly determined whether the larger project has an adverse environmental impact. Upon appeal by the City, in 1992 the State Supreme Court subsequently upheld the Circuit Court decision.

Therefore, as the proposed Public Baths pump station expansion is clearly, and by admission in the DEA, a segment of a larger project, and as this cumulative project is clearly a major public works undertaking, the incremental impacts of all segments of the larger project must be addressed.

- A. Why have the these three projects been segmented from each other and the larger project?
- B. How can the DEA presume a determination of negative impact when the taking of charitable trust lands and reconfiguration of an historic building have not been addressed and resolved?
- C. When will a full Environmental Impact Statement, including the specific (as opposed to "conceptual") incremental historic and land use environmental impacts of each segment of the larger project, be available for public review?

ARCHAEOLOGICAL and HISTORICAL SIGNIFICANCE

QUESTION #2:

Historically, the project expansion site was part of the landing site for the first Hawaiian colonization of the area over 2,000 years ago. This area is also an ancient Hawaiian burial site and a portion of the ancient Kapua/Kaneloa altar complex in what is now contemporary Kapiolani Park.

The DEA states that "an archaeological monitoring plan will be prepared... and excavations will be monitored during construction." (1-3)

Please define the process of active monitoring of construction activities by a qualified professional archaeologist; whether this monitoring will be constant, intermittent or on-call; and any and all action that might be taken if any archaeological deposits or human remains are encountered.

- A. Why does the DEA initially ignore that the area in question is part of a large area of Kapiolani Park from the pump station to Kuhio Beach, and that it is a prime shoreline park area used by residents and visitors alike along with the adjacent shoreline promenade and surrounding picnic areas?
- B. Why does the DEA ignore the fact that the old beach center adjacent to the area in question was recently demolished by the City in order to landscape and beautify this area for park users and to provide larger picnic areas and expanded vistas to the ocean?
- C. From whom does the City plan to acquire the adjacent 2,000 square-foot lot?
- D. Is the DEA statement that "no measures are planned to mitigate the land acquisition" based on the fact that there is no way to mitigate a taking of public park lands held in trust, and therefore this taking would trigger a determination of adverse impact for the proposed project, which would then require a full Environmental Impact Statement?
- E. When does the City and County anticipate presenting a full Environmental Impact Statement on this project for public review?

PERMITS

QUESTION #5:

The DEA states that "No federal permits or approvals are anticipated." Yet, the DEA confirms that a National Pollution Discharge Elimination System permit is required to be issued for the project. (1-3 and 1-4)

Why does the DEA deny that the National Pollution Discharge Elimination System (NPDES) permit invoking best management practices is indeed a federal permit, issued by the state?

QUESTION #6:

The DEA states that the applicant will apply for a Diamond Head Special District Permit and a Special Management Area Use Permit and will comply with permit conditions. Yet, later the DEA states that "Modification of the pump station may be subject to a Special Management Area Use Permit (SMP) due to development within the SMA." (1-2, 1-4 and 3-5)

- A. As the pump station site is currently situated in the heart of the Special Management Area along the Diamond Head shoreline (Figure 3.3), and the SMA process is borne of state and federal Coastal Zone Management policies, how does the DEA contemplate circumventing or otherwise avoiding compliance with the requirements of the SMA permit process involving public hearings before the City Council prior to implementing this project at this location?
- B. Does the DEA contemplate relocating the pump station outside the Special Management Area? If not, why not?

QUESTION #7:

The DEA states that "The project site is located within the core area of the Diamond Head Special District... Renovation of the existing structures and new construction shall conform to the design controls set forth in the special district... controls include landscaping requirements, height limitations and architectural design review." (3-5)

- A. The DEA shows on Figure 3.2 (3-6) that a zero-foot (0') height limit is stipulated for the park land where the pump station expansion is proposed to be situated. Is all structural and equipment expansion proposed for the park land adjacent to the existing pump station planned to be installed underground so as not to interfere with the view plane to the shoreline?

- B. The landscape screen surrounding the existing pump station facility has deteriorated considerably from neglect. What City department will be assigned to regular maintenance and irrigation of the landscaping required to screen this facility?

QUESTION #8:

The DEA states that "It is anticipated that the proposed pump station modifications will be classified as a minor project with minimal impact, subject to a minor permit with review and approval by the DLU Director." (3-9)

As the proposed project is situated in the Diamond Head core area and the scope of work includes major exterior repair, alteration and addition to the existing structures (Land Use Ordinance Table 7.2 @ 7-45), how does the DEA come to presume that a discretionary Diamond Head Special District permit approval by the DLU Director will avoid the requirement for full public review before the City Council?

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ENVIRONMENTAL

QUESTION #9:

The DEA states that the project site's soil is comprised of "soils that are 'excessively drained and calcareous' found in narrow strips near the ocean. Typical samples are single grain, ...sandy and can reach to depths of more than 60 inches." In addition, the DEA states that "The reliability of the (pump) station has slowly decreased with age." Further, 6-ft. pipeline segments are known to separate over time with joint deterioration, soil shift and ground movement. Other major problems identified at the Public Baths Wastewater Pump Station include saltwater infiltration into (and wastewater seepage out of) the collection system, depending on tidal conditions (See: EMBWFP @ 4-14). In addition, the presentation pamphlet for the Beachwalk Wastewater Pump Station Project illustrates on page 13 that sewer pipes wear from the inside, and that existing 1/2" pipes are currently worn half way through.

Further, the DEA states that the wastewater pump station site is "in a tsunami evacuation area which extends from the shoreline to Paki Avenue and also includes the entire Kapiolani Park." (3-3 and 4-1) Tsunamis and flooding can cause damage and destruction of collection infrastructure, including pump station power loss, creating infiltration and bypass problems. The greatest threat is posed by prolonged outages and releases caused by major damage to the system. (See: EMBWFP @ 3-48 and 8-15).

Moreover, it has been determined that rates of water exchange are reduced by the offshore breakwater structures in this vicinity, and that water quality at locations with a high residence time is also impacted by land-based nonpoint sources. Therefore, the "marine recreational water quality standards are chronically exceeded in this area... increasing the likelihood of the public coming into contact with bacteria, viruses and toxins associated with wastewater." (EMBWFP @ 3-45 and 5-18)

As the sewer pump station expansion is proposed adjacent to densely populated Waikiki area beaches, there is serious cause for concern for future public health and safety because of the above data, and because it is known that over time sewer line fracture and general diminishing of pump station and sewer line integrity occurs. Such is the case today, causing a federally mandated overhaul of Oahu's wastewater infrastructure.

In view of all of the above, why is this wastewater pump station being retained in high-percolation soil conditions in such close proximity to the shoreline of a densely populated public beach area?

QUESTION #10:

The DEA states that "in the event pump station odors become a concern, chemical dosing may be implemented at the wet well." (3-10)

- A. Please indicate the structural points of odor seepage from the proposed project.
- B. Please define the types of any and all chemicals expected to be used at this facility, and which toxic chemicals are planned to be stored at this facility.

QUESTION #11:

The DEA describes the scope of expansion as including "acquisition of 2,000 square feet of (park) land to enlarge the pump station parcel, providing vehicular access to the pump building and enabling installation of all equipment..." (2-4) Including :

- replacement of existing pumps with submersible pumps
- Installation of an emergency portable pump connection outside the pump station ...within the new flow meter housing*
- repair of the corroded wet well interior concrete
- replacement of existing discharge piping ...(and) existing flow meter and housing
- addition of a second pump controller
- interconnection of the existing 12-inch force main to the new 16-inch force main...
- connection of the pump house building and the emergency generator building to create an electrical room...
- expansion of the emergency generator room
- installation of a double-door entry and exterior access ramp...

- A. Please define specifically what equipment, housing, fencing or other embedded structural components are planned to be visible outside and around the existing pump station building; and what specific dimensions are contemplated for such respective objects, how much open space area will they consume, and at what height are they planned, respectively?

- B. Please define the term "wet well", the process of corrosion that occurs, and over what period and/or how often such corrosion will require repair in the future.

QUESTION #12:

The DEA states that potential impacts include "treatment and discharge of effluent from construction dewatering..." (3-18)

Please define the specific process of treatment and discharge of effluent from construction dewatering; whether this effluent currently exists in and/or percolates through subsurface soil conditions; and whether effluent discharge might continue to permeate subsurface soil at any time following construction dewatering.

QUESTION #13:

The DEA states that a grubbing and grading permit will be required from the Department of Public Works. Further, the DEA states that "...demolition, earthmoving and other activities may result in a temporary impact on air quality... Dust control measures may include... covering open bodied trucks." (1-4 and 3-10)

- A. Please define the scope of demolition and earthmoving planned for this proposed project.

- B. Please define the above term "other activities" that may result in impact on air quality.

QUESTION #14:

The DEA states that "Long term air quality may be impacted by... intermittent... emissions from the emergency generator... Emissions from the generator stack will have no significant impacts. (3-10)

Please define any impact anticipated from generator emissions, and the variable and/or constant degree to which such negative impact is expected to occur.

QUESTION #15:

The DEA states that "there is no record of complaints regarding odors emanating from the pump station." (3-9) However, it is known that wastewater pump stations are ideal locations for the release of odors caused by hydrogen sulfide gas due to septic sewage conditions in the wet wells.

Please provide a complete 5-year documented departmental record of data on periodical testing for odors at the pump station site, including measurements of ozone and hydrogen sulfide levels, respectively.

QUESTION #16:

The DEA states that "The closest residence is situated approximately 950 feet away from the pump station and the generator noise level there is probably inaudible during the day (less than 50 dBA)." (3-10)

- A. Specifically to which residence does the DEA refer?

- B. The DEA exhibits guesswork and incomplete evaluation of noise level impact. The DEA presents the above assumption without verifying this statement with documentation, charts and graphs of noise level impact from this facility at specific adjacent locations in the vicinity of the proposed project. The DEA states only that the noise level is "probably inaudible." Please provide a certified noise level study documenting metered analysis at specific radial locations surrounding the facility, including that mentioned in the DEA, and at what distances the 50 dBA level is actually attained during the generator's activation. Please provide accurate charts and graphs attendant to such documentation.

QUESTION #17:

The DEA states that "Existing noise levels at the property line (67 dBA makal, 75 dBA diamond head, 81 dBA mauka, 82 dBA ewa) would continue unless appropriate noise abatement measures are constructed." The DEA further promises that the noise levels will be reduced at the property line by 22 to 27 dBA with low impact acoustical treatments. However, the DEA states that the Department of Health's daytime noise limit of 55 dBA would require "major modifications... resulting in a high cost." (3-10 to 3-12)

- A. Please define 1) at what locations along the property line the proposed facility's noise level is anticipated to be reduced by 22 to 27 dBA with low impact acoustical treatment, and 2) at what locations along the property line the proposed facility's noise level will be unaffected by low impact acoustical treatment.

- B. Please define the material specifications, scope of work and cost for an "increased duct silencer length."

- C. Please define the material specifications, scope of work and cost for "addition of a furred gypboard layer to the interior building walls and sloping roof slab."

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TECHNICAL

QUESTION #18:

The DEA states that the existing wastewater pump station and force main facility has "inadequate capacity to handle existing and future projected wastewater flows." (1-1) And, that "the pump station cannot adequately convey the current wet weather peak flow through the new force main", therefore the "pump station capacity will be increased to meet the future peak design flow of 3.2 MGD." (4-1 and 2-1)

On what basis is this determination made when the engineered capacity of the existing facility is 2.2 MGD, the current daily average flow is .5 MGD, and the highest recorded flow within the last four years from rainwater infiltration raised the pump station's daily collection to only 1.7 MGD?

QUESTION #19:

The DEA states that the need to increase capacity of this facility is anticipated in order "to account for future domestic wastewater flows from residential areas along Diamond Head (Road) and Makalei Place that are presently unsewered." (2-1)

Please specify the MGD increase in wastewater flow expected from connecting the non-sewered residential segment along Diamond Head Road between Kapiolani Park and Kahala.

QUESTION #20:

The DEA states that the need to increase capacity of this facility is anticipated in order "to account for future domestic wastewater flows due to development of vacant lots... the majority... zoned for residential development." (2-1 and 3-1)

Please define a) the specific zoning classifications of anticipated new "residential development" and their anticipated locations, and 2) any other development of vacant lots and their locations, respectively, such that are projected to be serviced by the proposed Public Baths facility expansion.

QUESTION #21:

The DEA states that the need to increase capacity of this facility is anticipated in order "to accommodate the additional flows due to the infiltration and inflow into the sewer collection system..." (3-1)

A. Please provide a complete 5-year documented departmental record of sewage spills in Kapiolani Park.

B. Please define the current sources and their respective quantities of infiltration and inflow into the Public Baths sewer collection system.

C. Please define the specific sources and quantities of additional flows, respectively, due to any anticipated infiltration and inflow into the sewer collection system over and above the current conditions, as projected to be serviced by the proposed Public Baths facility expansion.

D. Would not infiltration and inflow be greatly reduced with the repair and replacement of deteriorating sewer lines? Which existing wastewater infrastructure segments are not planned to be replaced in this area?

QUESTION #22:

The DEA states that the need to increase capacity of this facility is anticipated in order "to account for increases in non-domestic wastewater flows generated by the Honolulu Zoo..." (2-1 and 3-1)

Please define the specific volume expected to be added to the wastewater flow into the Public Baths Pump Station above the current quantity from the Honolulu Zoo.

QUESTION #23:

The DEA states that the need to increase capacity of this facility is anticipated in order "to account for increases in non-domestic wastewater flows generated by the ...Waikiki Aquarium." (2-1 and 3-1)

Please define the specific volume expected to be added to the wastewater flow into the Public Baths Pump Station above the current quantity from the Waikiki Aquarium.

FINDINGS and REASONS REFUTING ANTICIPATED DETERMINATION of "NO SIGNIFICANT IMPACT"

The DEA's presumption that the Environmental Assessment supports a Finding of No Significant Impact, and that there is no need to prepare an Environmental Impact Statement, falls flat for the following reasons as applicable to Hawaii Administrative Rules, Title 11, Department of Health, Chapter 200, Environmental Impact Statement Rules, Section 11-200-12 "Significance Criteria":

1. The proposed project will involve an irrevocable commitment to loss and destruction of a portion of the Kapiolani Park natural and cultural resource, including contiguous recreational lands protected the Kapiolani Park Trust provisions, and historic lands and structures protected under the National Historic Preservation Act by virtue of standing as listed in the Register of Historic Places.
2. The proposed project will curtail the range of beneficial uses of the environment, including a) removal of a portion of a densely populated park recreation area and b) a potential future threat to adjacent shoreline water quality.
3. The proposed project will conflict with the state's long-term environmental policies, goals and guidelines under Chapter 344, HRS, including the following:
Land, water, mineral, visual, air, and other natural resources.
 - A. Encourage management practices which conserve and fully utilize all natural resources;
 - B. Encourage management practices which conserve and protect... open space areas;Parks, recreation and open space.
 - A. Establish, preserve and maintain scenic, historic, cultural, park and recreation areas, including the shorelines, for public recreational, educational and scientific uses;
 - B. Protect the shorelines of the State from encroachment of manmade improvements, structures and activities;
 - C. Promote open space in view of its natural beauty not only as a natural resource but as an enabling, living environment for its people.

The proposed project will conflict with court orders, including that the impacts generated by the larger, cumulative project must be addressed (See: S.P. 91-0457, 1992); and that City facilities are an inappropriate use of Kapiolani Park Trust, per sequential precedent that such land protected by charitable trust provisions is "constitutionally protected from alteration" (See: S.P. 89-015, 1991).

4. The proposed project will substantially affect the social welfare of the community by placing a public works facility of undisclosed noise, odor, and pollutant impact on park land frequented by residents and visitors alike, and protected in perpetuity by charitable Trust provisions for public recreation purposes.
5. The proposed project will involve a substantial degradation of environmental quality by encroaching on a protected historic landscape and consuming a portion of densely-populated public park recreation area.
6. The proposed project will have a considerable cumulative effect upon the environment, as a segment of a larger wastewater system improvement and upgrade project; and will involve a commitment for larger actions, including the Waikiki Public Baths Force Main Replacement project and the Beachwalk Wastewater Pump Station and Alternatives project.
7. The DEA has neither substantiated nor documented that the project will not cause long-term detrimental effects on air quality, water quality, or ambient noise levels in the surrounding park and shoreline recreation area.
8. The proposed project will substantially affect scenic vistas and view planes identified in county and state plans and studies, including those from Kapiolani Park to the ocean, and from the shoreline to Kapiolani Park and Diamond Head.
9. The DEA does not disclose the energy consumption required by the project, therefore the DEA does not substantiate its claim that the proposed project will not require substantial energy consumption.

As this cumulative project is a major public works undertaking, it is therefore recommended that a full Environmental Impact Statement (EIS) be prepared to include the Public Baths Wastewater Pump Station segment, the Waikiki Public Baths Force Main Replacement segment, and the Beachwalk Wastewater Pump Station and Alternatives segment. In any case, the above significant adverse impacts hold that an EIS is warranted on the Public Baths Wastewater Pump Station project as determined by state and federal environmental laws.

CONCLUSION

Based on review and analysis of the information provided, the Diamond Head/Kapahu/St. Louis Heights neighborhood Board seriously questions the Draft Environmental Assessment's posture that "the proposed project does not have the potential to generate significant environmental impacts, and the need to prepare an Environmental Impact Statement is not foreseen." (5-1) Conversely, it is apparent that a) the environmental impacts of the cumulative project, as defined, have not been addressed, and b) the Public Baths Wastewater Pump Station clearly has the potential to create adverse environmental impacts, based on the following:

1. The proposed project has been segmented from a larger, cumulative wastewater system improvement and upgrade project in the same vicinity. The cumulative project is subject to federal loan program funding and a federal best management practices permit. The proposed project expansion is targeted for protected historic park land governed by charitable trust provisions, and may fall subject to a federal National Historic Preservation Act Section 106 Review.

Contrary to state and federal environmental law, impacts of the cumulative development, known as the larger project (including the Public Baths Wastewater Pump Station segment, the Public Baths Force Main segment, and the Beachwalk Wastewater Pump Station Upgrade and Alternatives segment), have not been addressed. The "Conceptual Development Alternatives" covered in the 1993 Mamala Bay Facilities Plan, a study of the water quality and waste treatment conditions mandated by Court consent decree, do not serve as an Environmental Impact Statement for this segment of the cumulative project because it does not address a taking of 2,000 square feet of Kapiolani Park Trust lands, nor does it address the facility expansion and reconfiguration of the old pump station building.

Therefore, all environmental impacts generated by the proposed project at the Public Baths area of Kapiolani Park would more properly be addressed in a full Environmental Impact Statement.

2. The Public Baths Wastewater Pump Station segment proposes a taking of Kapiolani Park lands that are claimed to be needed for expansion and upgrade of an existing outdated pump station facility. This taking of public park land would appear to be illegal in that Kapiolani Park lands are held under charitable trust provisions that protect the land in perpetuity as a park for the people of Honolulu. As such charitable trust provisions supersede city, state and federal legislation, and the provisions of the Kapiolani Park Trust must remain in tact. A taking of charitable trust lands set aside for public park and recreational use appears infeasible, and therefore alternate locations in the Waikiki vicinity would need to be addressed.

3. Kapiolani Park was placed on the State Register of Historic Places in 1992, and is thus an historic site and landscape protected under the National Historic Preservation Act and eligible for the National Register of Historic Places. Historically, the project expansion site was part of the pre-contact landing site for the first Hawaiian colonization of the area over 2,000 years ago. This area is also an ancient Hawaiian burial site and portion of the ancient Kapua/Kaneloa altar complex in what is contemporary Kapiolani Park. Over 40 ancient Hawaiian burials in the area have been disturbed in this area, with such being disclosed most recently during the Monk Seal pool construction at the Waikiki Aquarium.

Post-contact historical data for the site includes establishment of Kapiolani park in 1877 by King Kalakaua, establishment of the terms of a charitable trust to protect the park lands in perpetuity in 1896, and a series of deeds protecting the park lands, including the project expansion site in question, as held in trust. In addition, the park landscape and facilities over 50 years old are registered as historic sites.

The project proposes to encroach on protected park lands, and proposes to "merge the pump building and generator building, unifying the appearance of the two separate structures into one." Therefore, the original stand-alone pump station building's architectural integrity is proposed to be obliterated with attached structures, causing desecration and destruction of its historical architectural integrity.

4. The sewer pump station expansion is proposed within porous soil conditions adjacent to densely populated Waikiki area beach and recreation area. It is known that over time sewer line fracture and general diminishing of pump station and sewer line integrity occurs, as pipeline segments are known to separate over time with joint deterioration, soil shift and ground movement. This allows ground seepage and infiltration to and from the surrounding area to occur.

Therefore, the placement of the proposed project segment in such close proximity to a densely populated shoreline recreation area causes concern for public health and safety.

5. The Draft Environmental Assessment fails to disclose and define specific impacts generated from a) generator noise and air pollutant emissions, b) wastewater treatment odor emissions, c) the scope of demolition and earthmoving during construction; and future a) on-site chemical storage, b) obstruction of park open space and shoreline, park and Diamond Head viewplanes; and fails to provide an incremental break-down for additional capacity required such that will meet a future design flow increase of 88%.

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DEPARTMENT OF WASTEWATER MANAGEMENT
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WPP 98-153
March 23, 1998

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ENGINEERING CONCRETS

Ms. Karen Ah Mai, Chairperson
Diamond Head/Kapahulu
St. Louis Heights Neighborhood Board No. 5
c/o Neighborhood Commission
City Hall, Room 400
Honolulu, Hawaii 96813

Ms. Karen Ah Mai
March 23, 1998
Page 2

Resolution of all issues is not a requirement for an EA or EIS, however, disclosure is. In compliance with the requirements, the Draft EA has disclosed these issues. We have since received a written determination from the State Historic Preservation Division stating their concurrence with the proposed architectural design of the building modification. Clarification of ownership of and/or authority over the adjacent land within TMK: 3-1-31:4 is an issue which our attorneys are working on. The court has not ruled on whether this parcel is part of the Kapiolani Park Trust lands.

c. *When will a full Environmental Impact Statement, including the specific (as opposed to "conceptual") incremental historic and land use environmental impacts of each segment of the larger project, be available for public review?*

There are no plans to prepare another EIS. It is still our opinion that there are no significant impacts which would warrant preparation of an EIS.

Archaeological and Historical Significance

2. *Please define the process of active monitoring of construction activities by a qualified professional archaeologist; whether this monitoring will be constant, intermittent, or on-call; and any and all action that might be taken if any archaeological deposits or human remains are encountered.*

As stated in the Draft EA, monitoring during construction will be detailed in a monitoring plan which will be submitted to the State Historic Preservation Division for approval.

Land Use

3. *Is the City and County of Honolulu prepared to consider alternatives to the Public Baths pump station expansion upon assessment of effects of the project under a federal Section 106 Review?*

According to the State Historic Preservation Division, the proposed project is not subject to federal review under Section 106.

Permits

4.a. *Why does the DEA initially ignore that the area in question is part of a large area of Kapiolani Park from the pump station to Kuhio Beach, and that it is a prime shoreline park area used by residents and visitors alike along with the adjacent shoreline promenade and surrounding picnic areas?*

Thank you for your letter of October 20, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

Cumulative Development

1.a. *Why have these three projects been segmented from each other and the larger project?*

The projects have not been segmented. All three projects (Beachwalk Wastewater Pump Station, Public Baths Wastewater Pump Station Modification, and Public Baths WWPS Force Main Replacement) were appropriately addressed in the *East Mamala Bay Wastewater Facilities Plan Final EIS* (December 1993). The EIS addressed the future municipal wastewater collection, treatment and disposal system associated with the Sand Island Wastewater Treatment Plant tributary area. The purpose of this EA for the Public Baths WWPS Modification is to address the site-specific impacts of this project.

b. *How can the DEA presume a determination of negative impact when the taking of charitable trust lands and reconfiguration of an (sic) historic building have not been addressed and resolved?*

The Draft EA correctly identifies the neighboring park as the Public Baths Beach Park. It has yet to be determined whether this park is part of Kapiolani Park Trust lands.

b. *Why does the DEA ignore the fact that the old beach center adjacent to the area in question was recently demolished by the City in order to landscape and beautify this area for park users and to provide larger picnic areas and expanded vistas to the ocean?*

A statement describing the recent construction will be included in the Final EA.

c. *From whom does the City plan to acquire the adjacent 2,000 square-foot lot?*

The State of Hawaii.

d. *Is the DEA statement that "no measures are planned to mitigate the land acquisition" based on the fact that there is no way to mitigate a taking of public park lands held in trust, and therefore this taking would trigger a determination of adverse impact for the proposed project, which would then require a full Environmental Impact Statement?*

See paragraph 1.c.

e. *When does the City and County anticipate presenting a full Environmental Impact Statement on this project for public review?*

See paragraph 1.c.

Permits

5. *Why does the DEA deny that the National Pollution (sic) Discharge Elimination System (NPDES) permit invoking best management practices is indeed a federal permit, issued by the state?*

The Draft EA discloses the need for NPDES permit coverage for both construction dewatering and hydrotesting. Preparation of applications for coverage under the state's general permits is anticipated. There is no federal review involved.

6.a. *As the pump station site is currently situated in the heart of the Special Management Area along the Diamond Head shoreline (Figure 3.3), and the SMA process is borne of state and federal Coastal Zone Management policies, how does the DEA contemplate circumventing or otherwise avoiding compliance with the requirements of the SMA permit process involving public hearings before the City Council prior to implementing this project at this location?*

The need for a Special Management Area Use Permit was disclosed in the Draft EA. There are no plans to circumvent or avoid compliance with the permit or permitting process. For clarification, the Final EA will be revised to state: "Modification of the pump station will be subject to a Special Management Area Use Permit (SMP) due to development within the SMA."

b. *Does the DEA contemplate relocating the pump station outside the Special Management Area? If not, why not?*

No. There are no suitable locations for the pump station beyond the SMA limits. Nearly the entire service area is located within the SMA (see Figures 2.3 and 3.3 in the Draft EA). The impetus for the proposed project was addressed in facilities planning documents.

7.a. *The DEA shows on Figure 3.2 (3-6) that a zero-foot (0) height limit is stipulated for the park land where the pump station expansion is proposed to be situated. Is all structural and equipment expansion proposed for the park land adjacent to the existing pump station planned to be installed underground so as not to interfere with the view plane to the shoreline?*

No. Some equipment will be located above grade. According to the Land Use Ordinance, the DLU director may grant exceptions to special district height limits, not to exceed the height regulations for the underlying zoning district. In this case, the site is zoned General Preservation (P-2) which is subject to a height regulation of 15 feet (25 feet with setbacks). The proposed equipment and protective housing would generally be located close to the ground and should not interfere with view planes.

b. *The landscape screen surrounding the existing pump station facility has deteriorated considerably from neglect. What City department will be assigned to regular maintenance and irrigation of the landscaping required to screen this facility?*

Maintenance of landscaping will be the responsibility of the Department of Wastewater Management.

8. *As the proposed project is situated in the Diamond Head core area and the scope of work includes major exterior repair, alteration and addition to the existing structures, (Land Use Ordinance Table 7.2 @ 7-45), how does the DEA come to presume that a discretionary Diamond Head Special District permit approval by the DLU Director will avoid the requirement for full public review before the City Council?*

The Department of Land Utilization has determined that a minor DHSD Permit will be required. Major above-grade infrastructure (roadways, sewer, water, electrical, gas, cable tv, drainage and recreational facilities) improvements are subject to a minor special district permit.

Environmental

9. *In view of all of the above, why is this wastewater pump station being retained in high-percolation soil conditions in such close proximity to the shoreline of a densely populated public beach area?*

The fact is, the pump station is situated at the low point of the wastewater collection system. Wastewater generated within the service zone flows by gravity within the existing pipe network to this location. Movement of the pump station to another location is not feasible.

The fact that the project soils are permeable is not of significant consequence. Of greater concern is the age and reliability of the existing facility.

The purpose of the proposed project is to overhaul the existing aged pump station facility and improve its reliability so that spills will not occur in the future. One of the proposed improvements is installation of pumps that can be operated even if submerged in a flood. There will be a greater public health concern if the proposed project is not built and the existing facility continues to operate as is.

- 10.a. *Please indicate the structural points of odor seepage from the proposed project.*

Odors may emanate from any openings to the atmosphere within the pipeline network. Typically, these openings are vent holes in manhole covers. Odors are more likely to be generated downstream of the pump station, than at the pump station itself. Every effort will be made to address the odor issue.

- b. *Please define the types of any and all chemicals expected to be used at this facility, and which toxic chemicals are planned to be stored at this facility.*

The need for chemical dosing at the pump station to control downstream odors is presently being studied by a consultant. Any odor control recommendations which result will be included in the Final EA.

- 11.a. *Please define specifically what equipment, housing, fencing or other embedded structural components are planned to be visible outside and around the existing pump station building; and what specific dimensions are contemplated for such respective objects, how much open space area will they consume, and at what height are they planned, respectively?*

Proposed exterior improvements which will be visible (above ground) include: new flow meter housing; connection of the pump house building and emergency generator building; expansion of the emergency generator room; and construction of an accessible access ramp and new exterior entrance to the pump room. A flow meter and portable pump connection will be contained within the new flow meter housing. New construction proposed within the additional 2,000 SF which will be visible above ground are: the perimeter fence (6 ft high); the flow meter housing (approximately 18 ft long X 7 ft wide X 0.5 feet above ground), surrounded by a 3 ft high railing; and the portable pump connection pipe which will surface above the flow meter housing. Refer to Figure 2.5 of the Draft EA for an illustration of the proposed improvements. Actual dimensions will not be available until the project is designed.

- b. *Please define the term "wet well," the process of corrosion that occurs, and over what period and/or how often such corrosion will require repair in the future.*

The term "wet well" refers to an underground concrete tank or basin at the pump station which functions as a temporarily holding chamber for wastewater. When wastewater rises to a predetermined level in the wet well, the pumps are activated and the wastewater is pumped out. Corrosion may occur in the wet well due to hydrogen sulfide gas released from wastewater as it "falls" into the wet well from the sewer pipe. Hydrogen sulfide wears away unprotected metal and concrete surfaces. Similar corrosion occurs within manholes and sewer piping. The proposed project includes rehabilitation of worn wet well surfaces and installation of a protective coating to line the wet well surfaces. While conditions vary from site to site, the new liner is anticipated to last for 20 to 30 years.

- 12.a. *Please define the specific process of treatment and discharge of effluent from construction dewatering; whether this effluent currently exists in and/or percolates through subsurface soil conditions; and whether effluent discharge might continue to permeate subsurface soil at any time following construction dewatering.*

"Construction dewatering effluent" is simply unwanted ground water which accumulates in a trench or hole dug to a depth below the water table. The accumulated ground water is often pumped out to allow construction in "dry" conditions. Ground water is present in the subsurface soil near sea level elevations. It is pumped out only if it interferes with construction. For this project, construction dewatering will be required when excavations

extend below an elevation of about 2 feet MSL. Treatment of construction dewatering effluent (ground water) to remove soil, debris and/or other pollutants are required if it will be discharged to the ocean or storm drain system. If the ground water is returned to the ground (infiltration), no treatment is required.

A NPDES permit for construction dewatering was listed in the Draft EA under "Permits and Approvals Required." This permit will be needed if ground water is discharged to the ocean or storm drain. Treatment methods will be outlined in the permit application and submitted to the state Department of Health for their approval.

13.a. Please define the scope of demolition and earthmoving planned for this proposed project.

Demolition activities include removal of the existing fence, flow tube box and portions of the existing structures to facilitate new construction. Earthmoving or grading includes trenching to install the new pipes and equipment, and reshaping the surfaces soils for the new building expansion foundation. Demolition and earthmoving activities will be detailed in the construction documents.

b. Please define the above term "other activities" that may result in impact on air quality.

Exposed or bare soil, stockpiles of construction materials, etc. which are subject to wind have the potential to generate dust which may impact air quality.

14. Please define any impact anticipated from generator emissions, and the variable and/or constant degree to which such negative impact is expected to occur.

Potential impacts on air quality resulting from operation of the emergency generator will occur only when the generator is in use. As stated in the Draft EA, the generator is tested weekly. We are unable to estimate actual use of the generator since the occurrence of electrical power failure is unknown. The impact of generator emissions is "long term" or lasting because it will be an ongoing occurrence. In contrast, "short term" impacts are typically associated with construction and terminate with completion of construction activities. It should be noted that the anticipated infrequent occurrence of generator emissions is not a public health concern and the Department of Health does not require a permit for operation of the generator.

15. Please provide a complete 5-year documented departmental record of data on periodical testing for odors at the pump station site, including measurements of ozone and hydrogen sulfide levels, respectively.

The requested data is not routinely collected and therefore cannot be provided. However, some data has been collected for a recent odor study and will be available for public review upon completion of the study.

16.a. Specifically to which residence does the DEA refer?

The closest residence is located within The New Olani Kaimana Beach Hotel, 2863 Kalakaua Avenue.

b. The DEA exhibits guesswork and incomplete evaluation of noise level impact. The DEA presents the above assumption without verifying this statement with documentation, charts and graphs of noise level impact form (sic) this facility at specific adjacent locations in the vicinity of the proposed project. The DEA states only that the noise level is "probably inaudible." Please provide a certified noise level study documenting that metered analysis at specific radial locations surrounding the facility, including that mentioned in the DEA, and at what distances the 50 dBA level is actually attained during the generator's activation. Please provide accurate charts and graphs attendant to such documentation.

The existing acoustical conditions at the pump station were evaluated by Y. Ebsu and Associates, Acoustical and Electronic Engineers. There are no plans to prepare additional acoustical studies. The proposed sound abatement measures will reduce existing noise levels as disclosed in the Draft EA.

17.a. Please define 1) at what locations along the property line the proposed facilities noise level is anticipated to be reduced by 22 to 27 dBA with low impact acoustical treatment, and 2) at what locations along the property line the proposed facility's noise level will be unaffected by low impact acoustical treatment.

The proposed acoustical treatment will reduce noise levels at all points along the property line.

b. Please define the material specifications, scope of work and cost for an "increased duct silencer length".

The information requested pertains to specific design data which is not available since the alternative is not feasible and will not be pursued.

c. Please define the material specifications, scope of work and cost for "addition of a furred gypboard layer to the interior building walls and sloping roof slab."

The information requested pertains to specific design data which is not available since the alternative is not feasible and will not be pursued.

Technical

18. *On what basis is this determination made when the engineered capacity of the existing facility is 2.2 MGD, the current daily average flow is .5 MGD, and the highest recorded flow within the last four years from rainwater infiltration raised the pump station's daily collection to only 1.7 MGD?*

Flow projections for the project were addressed in the *Preliminary Engineering Report (PER) for the Public Baths Wastewater Pump Station Modification*. A pre-final version of this PER dated May 1997 may be reviewed at the department office.

19. *Please specify the MGD increase in wastewater flow expected from connecting the non-sewered residential segment along Diamond Head Road between Kaplolanl Park and Kahala.*

The PER reports that of the estimated 2,071 persons residing in the service area in 1990, approximately 92 reside in the unsewered portion. Although wastewater flow is not directly proportional to population, population provides some basis for comparison.

20. *Please define a) the specific zoning classifications of anticipated new "residential development" and their anticipated locations, and 2) any other development of vacant lots and their locations, respectively, such that are projected to be serviced by the proposed Public Baths facility expansion.*

Vacant lot locations are indicated on the Existing Land Use Map (Waikiki-Diamond Head) which may be reviewed at the City and County Planning Department. Refer to the PER for information on the flow projections.

21. a. *Please provide a complete 5-year documented departmental record of sewage spills in Kaplolanl Park.*

According to the *Spill Reduction Action Plan Engineering Report*, dated November 1995, there were no reported spills at the pump station from 1989 to 1993. This report may be reviewed at the department office.

- b. *Please define the current sources and their respective quantities of infiltration and inflow into the Public Baths sewer collection system.*

Infiltration and inflow quantities are addressed in the PER.

- c. *Please define the specific sources and quantities of additional flows, respectively, due to any anticipated infiltration and inflow into the sewer collection system over and above the current conditions, as projected to be serviced by the proposed Public Baths facility expansion.*

This information is included in the PER.

- d. *Would not infiltration and inflow be greatly reduced with the repair and replacement of deteriorating sewer lines? Which existing wastewater infrastructure segments are not planned to be replaced in this area?*

Yes, infiltration and inflow would be reduced with repair and replacement of deteriorating sewers. However, repair work has not been budgeted for this service area. A report "Preliminary Cost-Effectiveness Assessment, Preliminary Basin Reports, Sewer Rehabilitation and Infiltration and Inflow Minimization Plan" (Dec. 1995) determined that rehabilitation of the Public Baths WWPS collection system was not cost effective.

22. *Please define the specific volume expected to be added to the wastewater flow into the Public Baths Pump Station above the current quantity from the Honolulu Zoo.*

An additional 1.0 MGD flow component will account for increased flows from the zoo, aquarium, natatorium and other unforeseen projects. Refer to the PER for more information.

23. *Please define the specific volume expected to be added to the wastewater flow into the Public Baths Pump Station above the current quantity from the Waikiki Aquarium.*

An additional 1.0 MGD flow component will account for increased flows from the zoo, aquarium, natatorium and other unforeseen projects. Refer to the PER for more information.

We acknowledge your view of the project with respect to the significance criteria. We recognize there is a legal issue regarding ownership of this parcel. Please be informed that the Department of the Corporation Counsel is actively pursuing this issue of land ownership. The issues relating to historical significance, public health and environmental impacts have been addressed. The need for additional developmental permits has been disclosed. It is our determination that the project will have no significant impact, therefore, does not warrant preparation of an EIS.

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DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
450 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 98-308

June 3, 1998

Ms. Karen Ah Mai, Chairperson
Diamond Head/Kapahulu/St. Louis Heights
Neighborhood Board No. 5
c/o Neighborhood Commission
City Hall, Room 400
Honolulu, Hawaii 96813

Dear Ms. Ah Mai:

Subject: Draft Environmental Assessment (EA) for
Public Baths Wastewater Pump Station Modification
Honolulu, Oahu, Hawaii
TMK: 3-1-31:7

The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board No. 5 had previously expressed concern over the proposed acquisition of a 2,000 sq. ft. parcel of park land for the proposed pump station modification. After careful reevaluation, the Department of Wastewater Management has decided to forego the previously proposed land acquisition for this project. The proposed pump station improvements will be constructed underground, outside of the pump station fence similar to the existing flow box presently located adjacent to the pump station. An approval of construction from the Department of Land and Natural Resources will be sought for these underground facilities. Construction activities will also be coordinated with the Kapiolani Park Preservation Society.

Revisions to the proposed project will be addressed in the Final Environmental Assessment, presently being prepared by our consultant. Should you have any questions, please contact Mr. Sung Ho Lai at the Division of Planning and Service Control at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEPE
KENNETH E. SPRAGUE
Director

cc: / Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

Ms. Karen Ah Mai
March 23, 1998
Page 11

A copy of your comment letter and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,

KENNETH E. SPRAGUE
Director

cc: / Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

KAPIOLANI PARK PRESERVATION SOCIETY

P.O. BOX 90103. HONOLULU, HAWAII 96813

September 5, 1997

Sung Ho Lai
Department of Wastewater Management
City and County of Honolulu
650 South King Street, 14th Floor
Honolulu, Hawaii 96813

RECEIVED

SEP 10 1997

ENGINEERING CONCEPTS

Dear Mr. Lai:

Subject: Public Baths Wastewater Pump Station Modification
DRAFT Environmental Assessment

Thank you for the opportunity to review and comment on the above referenced subject Draft Environmental Assessment.

Figure 1.2 Project Background

We find that the Public Baths Wastewater Pump Station Modification project and the Public Baths WWPS Force Main Replacement project are both segments of a larger project and the total project should be addressed in a single EIS.

Figure 1.4 Project and Site Description

Please be advised that the Public Baths WWPS (TMK: 3-1-31-070) is located in Waikiki on the Makai side of Kalakaua Avenue in the "Memorial Park" Section of Kapiolani Park. The Waikiki Aquarium and the Public Baths Parcel of Kapiolani Park Beach are adjacent to the project site.

Figure 1.5 Summary of Potential Impacts and Mitigation Measures
Land Acquisition

Please be advised that the approximately 2,000 square feet of adjacent park land can not be acquired to enable all pump station equipment to be contained within a relocated fence for security and public safety. This area of approximately 2,000 square feet of adjacent park land is the property of the Kapiolani Park Trust, set aside forever as park land, can not be used for municipal purpose and is not subject to eminent domain. The Public Baths parcel portion of the Kapiolani Park Trust lands was included in a series of deeds conveying these lands in 1896 from the Kapiolani Park Association to the Kapiolani Park Trust. The conveyance was for the fee simple interest, subject to a leasehold interest that was to expire in 1919. Prior to the 1919 expiration, the County of Honolulu acquired the leasehold interest which it conveyed by deed dated December 20, 1906, recorded in the Bureau of Conveyances of the State of Hawaii, in liber 284 on pages 438-440 to the Kapiolani Park Trust.

Public Baths Wastewater Pump Station Modification
DRAFT Environmental Assessment
September 5, 1997
Page 2 of 2

3.14 ARCHAEOLOGY/HISTORIC SITES

3.14.1 Existing Conditions

The existing pump station building is an historic structure located within Kapiolani Park and is listed on the Hawaii Register of Historic Places. Kapiolani Park is eligible for listing on the National Register of Historic Places, and as such, Federal preservation laws apply.

The proposed additions and modifications to the existing historic pump station building would adversely effect the architectural integrity and historic quality of the structure and area.

3.17 PARK/PARK USERS

3.17.2 Potential Impacts

It is proposed to temporarily use park lands for: contractor's field office; material storage/staging area; detention, treatment and discharge of effluent from construction dewatering; and vehicle parking.

Please be advised that such proposed usage of Kapiolani Park Trust lands (or any detected park land) is prohibited. The prohibition of such usage has been upheld by the Hawaii State Courts in legal proceedings brought by the Kapiolani Park Preservation Society vs. Royal Construction Company and the City and County of Honolulu.

Again, thank you for the opportunity to address our concerns.

Very truly yours,
KAPIOLANI PARK PRESERVATION SOCIETY


Allan Voronaeff, President

cc: Engineering Concepts, Inc.
Kenneth Ishizaki

Office of Environmental Quality Control

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DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
880 SOUTH KING STREET
HONOLULU HAWAII 96813



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ENGINEERING CONCEPTS

Mr. Allan Voronaeff
Page 2
December 17, 1997

CHERYL K. OKUMA-SEPE
DIRECTOR
DEPUTY DIRECTOR

WPP 97-776

December 17, 1997

Mr. Allan Voronaeff, President
Kapiolani Park Preservation Society
P.O. Box 90183
Honolulu, Hawaii 96835

Dear Mr. Voronaeff:

Subject: Draft Environmental Assessment (EA) for Public Baths Wastewater Pump Station Modification, Honolulu, Oahu, Hawaii, TMK: 3-1-31:7

Thank you for your letter of September 5, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments:

1. Figure 1.2 - Project Background

The Public Baths Wastewater Pump Station Modification and the Public Baths WWPS Force Main Replacement projects were both addressed in the *East, Mamala Bay Wastewater Facilities Plan Final Environmental Impact Statement* (December 1993) which addressed the future municipal wastewater collection, treatment and disposal system associated with the Sand Island Wastewater Treatment Plant tributary area. This information will be included in the Final EA, for clarification.

2. Figure 1.4 - Project and Site Description

The Public Baths WWPS parcel (TMK: 3-1-31:7) was designated for sewage pump station by Executive Order No. 02741 on February 10, 1975. Judge Chun (on June 28, 1991) and Judge Yim (on December 29, 1994) both ruled that the Public Baths WWPS parcel is not part of the Kapiolani Park Trust lands.

3. Figure 1.5 - Summary of Potential Impacts and Mitigation Measures: Land Acquisition

Clarification of ownership of and/or authority over the adjacent land within TMK: 3-1-31:4 is an issue which we are working to resolve. The court has not ruled on whether the parcel is part of the Kapiolani Park Trust lands. We are aware of your stance against use of this land for any purpose other than a public park.

4. 3.1.4 ARCHAEOLOGY/HISTORIC SITES
3.1.4.1 Existing Conditions

We understand that the existing pump station building is considered a historic structure located within the boundary of Kapiolani Park, as listed on the Hawaii Register of Historic Places. This information was included in the Draft EA.

For your information, the State Historic Preservation Division (SHPD) has determined that the proposed project is not subject to Section 106 federal review since construction will not be within waters or use federal funds.

We have discussed the proposed building modifications with the SHPD and have received their concurrence on the proposed architectural modifications. We will continue to coordinate with SHPD during the various stages of planning and design of the project.

5. 3.1.7 PARK/PARK USERS
3.1.7.2 Potential Impacts

We understand your contention that use of Kapiolani Park Trust lands, even temporarily, during construction activities, is not acceptable. However, as stated previously, ownership of and/or authority over use of the adjacent lands are issues which have yet to be resolved.

A copy of your comment letter and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEPE
KENNETH E. SPRAGUE
Director

cc: ✓ Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
 430 SOUTH KING STREET
 HONOLULU, HAWAII 96813

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JUN 8 1998

ENGINEERING CONCEPTS

KENNETH E. SPRAGUE, P.E., P.O.

DIRECTOR

CHERYL K. OKUMA-SEPE

DEPUTY DIRECTOR

WPP 98-312

June 5, 1998



Mr. Allan Voronaeff, President
 Kapiolani Park Preservation Society
 P.O. Box 90183
 Honolulu, Hawaii 96835

Dear Mr. Voronaeff:

Subject: Draft Environmental Assessment (EA) for
 Public Baths Wastewater Pump Station Modification
 Honolulu, Oahu, Hawaii
 TMK: 3-1-31:7

The Kapiolani Park Preservation Society had previously expressed opposition to the loss of 2,000 square feet of park land for the pump station modification. We are pleased to inform you that the City has revised its plan for the modification of the subject pump station. We no longer plan to acquire and enclose the additional 2,000 square feet of park land. Heeding your advice, our modified plan is to construct the flow meter box underground similar to the existing one presently located on park ground. The attached site plan shows the new 16-inch force main and the underground flow meter box that will be located beneath the park ground. The pump station fence will remain as is.

In order to carry out the pump station modification, excavations will be required for the construction of the flow meter box and the force main, and dewatering will be required for the portion of the construction extending below the groundwater. Temporary use of the park land adjoining the pump station, approximately 100 feet by 100 feet in plan, will be needed for approximately 14 months to provide access, storage of materials and to stage the construction. In addition, an area of about 2,500 square feet will be needed for 6 to 8 weeks for treatment and/or disposal of groundwater pumped from excavations requiring dewatering. We request your support and input to carry out this project. The ground conditions will be restored upon completion of the project. More detailed plans for these temporary uses will be forwarded to you for review and concurrence when they are developed. We look forward to meeting with you to discuss these construction details and any questions or concerns you may have.

Revisions to the proposed project will be addressed in the Final Environmental Assessment, presently being prepared by our consultant. Should you have any questions, please contact Mr. Sung Ho Lai at the Division of Planning and Service Control. He can be reached at 527-5398.

Sincerely,

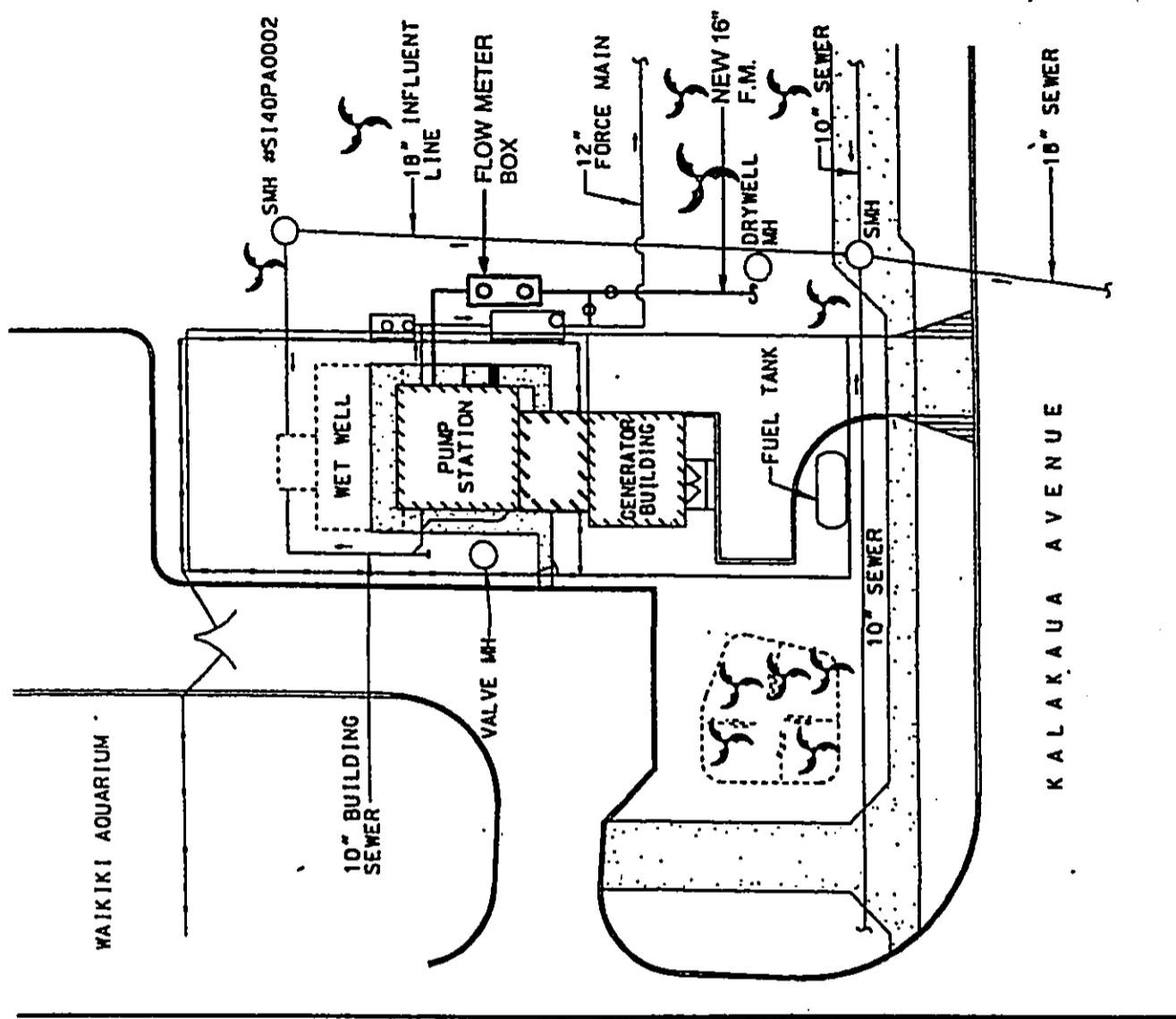
CHERYL K. OKUMA-SEPE

KENNETH E. SPRAGUE

Director

Attachment

cc: Donald Griffin, Department of Parks & Recreation
 Kenneth Ishizaki, Engineering Concepts, Inc.
 Jeyan Thiruganum, Office of Environmental Quality Control



MODIFIED PUBLIC BATHS WWPS SITE PLAN

Adapted from Final Report
 Main Reclamation
 Final Preparation, Engineering
 Staff: Collins, Hasegawa, November, 1994



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 SCALE IN FEET

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KAPIOLANI PARK ADVISORY COUNCIL

August 18, 1997

Mr. Kenneth Ishizaki, Vice President
Engineering Concepts, Inc.
250 Ward Avenue, Suite 206
Honolulu, Hawaii 96814

Via Facsimile Only to 591-9010

Subject: Public Baths Wastewater Pump Station Modification
Draft Environmental Assessment

Dear Mr. Ishizaki:

The Kapiolani Park Advisory Council has just received the Draft Environmental Assessment for the above project. We understand that the deadline for comments pertaining to the DEA is September 8, 1997. However, as the KPAC has regular monthly meetings to review matters concerning Kapiolani Park as addressed in committee, comments from the KPAC subsequent to committee review of the DEA will not be available until October.

Therefore, we respectfully request that the Department of Wastewater Management of the City and County of Honolulu, and their consultant for the above DEEA, Engineering Concepts, Inc., extend the deadline for the comment period until November 8, 1997. We are confident that this will allow adequate time for all interested and affected parties to review and comment on the above development.

We look forward to receiving notification of your decision to extend the deadline for comments on the DEA. As time is of the essence, notification may be faxed to 737-6727.

Your assistance in this matter is greatly appreciated.

Very truly yours,

Michelle Spalding Matson
Michelle Spalding Matson, Chairperson

cc: Director Kenneth Sprague, DWWWM
Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board #5
Kapiolani Park Preservation Society

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
880 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

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AUG 23 1997

ENGINEERING CONCEPTS

EDMETH E. SPRAGUE, P.E., P.L.C.
DIRECTOR

CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 97-497

August 21, 1997

Ms. Michelle Spalding Matson, Chairperson
Kapiolani Park Advisory Council
3230 Collins Street
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Public Baths Wastewater Pump Station Modification
Draft Environmental Assessment

We have received your letter of August 18, 1997 requesting the postponement of the dead line for the review comments on the Draft Environmental Assessment to November 8, 1997. We understand that the additional time is needed for the review and the approval by the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board prior to the submittal. However, two months postponement will set our project back by that much time. As you have indicated over the phone, it may be possible to have your review comments approved by early to middle of October (October 15, 1997). We appreciate any effort on your part to cut down that additional time requirement to help us move this project forward.

If there are any questions, please contact Sung Ho Lai of the Division of Planning and Service Control at 527-5398.

Sincerely,

Kenneth E. Sprague

KENNETH E. SPRAGUE
Director

cc: / Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

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PUBLIC BATHS WASTEWATER PUMP STATION
DRAFT ENVIRONMENTAL ASSESSMENT

RECEIVED
OCT 29 1997
ENGINEERING CONCEPTS

KAPIOLANI PARK ADVISORY COUNCIL

Mr. Kenneth E. Sprague, Director
Department of Wastewater Management
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Mr. Gary Gill, Director
Office of Environmental Quality Control
State Office Tower, Suite 702
235 South Beretania Street
Honolulu, Hawaii 96813

Mr. Sung Ho Lai
Division of Planning and Service Control
Department of Wastewater Management
650 South King Street, 14th Floor
Honolulu, Hawaii 96813

Mr. Kenneth Ishizaki
Engineering Concepts, Inc.
250 Ward Avenue, Suite 206
Honolulu, Hawaii 96814

Subject: Public Baths Wastewater Pump Station Draft Environmental Assessment

Gentlemen:

Enclosed please find our response to the Draft Environmental Assessment for the proposed Public Baths Wastewater Pump Station Project.

You will find that our questions and comments focus on project impact on Kapiolani Park recreation lands; absence of data on historic significance; Trust provisions and Court orders; and environmental impacts on recreational open space, cultural landscape, significant viewplanes, air and noise quality, and future shoreline water quality in and around Kapiolani Park.

As there appears to be sufficient reason to expect significant adverse impacts from the placement and operation this proposed segment of the larger project, we request that a full Environmental Impact Statement be provided for this segment of the cumulative development should the City wish to pursue proposing this development at this location.

In addition, we ask that you request full review and comments on this proposal from the individual Trustees of the Kapiolani Park Trust. We look forward to your response on the attached questions, comments and concerns.

Very truly yours,


Michelle Spalding Matson
Chairperson

cc: Kapiolani Park Trustees
Kapiolani Park Preservation Society

3902 Piikoi Avenue Honolulu, Hawaii 96815

OWNERSHIP and GOVERNING INSTRUMENTS

QUESTION 1:

The Draft Environmental Assessment (DEA) repeatedly refers to the Public Baths Beach Park as belonging to the City and County of Honolulu, Department of Parks and Recreation (1-1, 3-1, 3-2). However, in reality the Public Baths park land is part and parcel within the boundaries of the Kapiolani Park Trust and protected by Trust provisions. This is substantiated by a series of deeds from the turn of the century, including the Deed of 1906 (Liber 284, pgs. 438-440) together with the Deed of 1913 (Liber 392, pg. 408-410). Further, the DEA itself briefly acknowledges the Trust's ownership of the Public Baths beach and park area of Kapiolani Park (3-2).

Why does the DEA curiously confuse the facts concerning ownership and provisions governing the Public Baths beach and park area of Kapiolani Park?

QUESTION 2:

The DEA contemplates that "approximately 2,000 square feet of adjacent park land will need to be acquired" for expansion of the Public Baths Pump Station facility, and proclaims that "...the proposed project will take 2,000 square feet of park land for expansion of the... facilities." (1-2, 1-3 and 3-2)

Act 53 of 1896 sets aside Kapiolani Park for public use and recreation in perpetuity and establishes the provisions of the Kapiolani Park Trust, including that the Trust lands or any part thereof shall not be leased or sold. This was upheld by the Hawaii State Supreme Court in 1988 (Kapiolani Park Preservation Society vs. City and County of Honolulu, Pentagram Corp./Burger King, and Royal Contracting), and again in 1991 by the Circuit Court (City and County of Honolulu vs. Hawaii State Attorney General and Kapiolani Park Preservation Society), which held that city facilities on Trust land are an inappropriate use and thus are "in violation of the charitable Trust."

A. How does the DEA propose to accomplish this taking of 2,000 square feet of charitable Trust land when, by case precedent, government is precluded from superseding charitable trust provisions when such land is "constitutionally protected from alteration by legislation", as held by the U.S. Supreme Court in 1819 (Dartmouth College Trust vs. Woodward)?

B. What does the State Department of Land and Natural Resources have to do with "land acquisition" permits or approvals required for this proposed facility expansion project? (1-1)

C. From whom does the City expect to acquire the adjacent park land?

QUESTION 3:

The DEIA states that "The pump station is a public use structure which is a principal use, allowable under the current zoning." (3-5)

The DEIA again ignores that the Court has held that City facilities are an inappropriate use of, and must be removed from, Trust lands (See: Circuit Court Special Proceedings No. 89-0015, 1991). Please provide a list of alternate locations for the wastewater pump station outside Trust land boundaries.

QUESTION 4:

The DEIA states that "The Public Baths WWPS, originally constructed in 1944, occupies a 3,599 sq. ft. lot located on the makai side of Kalakaua Avenue across from Kapiolani Park", and "The area in question is ... not a prime area for park users." (2-1 and 3-2)

Why does the DEIA contradict the facts here that Kapiolani Park Trust lands (known as the Public Baths beach park area) are also contiguous to the pump station on the lot's seaward makai sides (1-2 and 1-3); and, as stated elsewhere in the DEIA, that "The project site is ... surrounded by the open space of public park... recreational areas?" (3-1)

USE OF PROTECTED PARK LANDS

QUESTION 5:

The DEIA states that "According to the State Historic Preservation Division, the project is considered to be located within Kapiolani Park, which is listed on the Hawaii Register of Historic Places." (3-13)

Indeed, Kapiolani Park was placed on the Hawaii State Register of Historic Places in 1992, and as such is rendered eligible for the National Register of Historic Places. With such standing as a protected historic site and landscape, Kapiolani Park is subject to the provisions of the National Historic Preservation Act (NHPA). Consequently, the proposed pump station project may fall subject to a federal NHPA Section 106 Review action (36 CFR Part 800).

A. Please explain why the DEIA files in the face of Kapiolani Park Trust deeds, state and federal historic site designations, and subsequent protected-site substantiation by the State Historic Preservation office by ignoring the fact that this City public works project expansion is proposed for protected lands?

QUESTION 6:

The DEIA acknowledges that there is "a high probability of encountering archaeological midden deposits related to prehistoric Hawaiian habitation and burials. On May 18, 1993, human remains were encountered during excavations for improvements to the Waikiki Aquarium, immediately adjacent to the pump station site. In addition, over 40 burials have been recovered in the beach sand along the shoreline..." (3-13)

Please define (a) any anticipated active monitoring of construction activities by a qualified professional archaeologist; (b) whether this monitoring will be constant, intermittent, or on-call; and (c) any and all action that might be taken if any archaeological deposits or human remains are encountered.

QUESTION 7:

The DEIA acknowledges that "The pump station building was constructed in 1944 and is considered to be a historic structure since it is over 50 years old." (3-13)

Under the DEIA's "Archaeology/Historic Sites" Section 3.14, only archaeological deposits and human remains are discussed. The DEIA falls flat by ignoring any discussion whatsoever of the adverse impact of proposed alterations to the historic pump station building, including impacts to the integrity of the existing historic structure from demolition, enlargement, roof replacement, attachment, and other alterations that diminish and/or delete the historic architectural character of this building. Further, there is no discussion of mitigation of such impacts.

However, under "Aesthetics", Section 3.15, the DEIA acknowledges that the proposed project will "consist of integrating the existing pump and generator buildings into one building... expanding the generator building on the northwest (Trust park land) side... merge the pump building and generator building, unifying the appearance of the two separate structures into one. The roof lines will be aligned and new roofing (similar to the existing) material will be used over the whole building." (3-14)

Figures 3-6, 3-7, and 3-8 show that the original stand-alone pump station building's architectural integrity is obliterated with attached structures and a common roof of contemporary material whose quality is inferior to the original. The contemporary roof tile on the generator building does not conform with the original roof tile of historic architectural value on the pump station building. Further, the fibrous cement roof tile material proposed as "similar to the existing" is known to a) harbor common algae that causes discoloration and to b) fade in color over the short term.

A. Please provide an Environmental Impact Statement pertaining to the proposed project, including information on preservation of the architectural character and integrity of the pump station building in accordance with the National Historic Preservation Act as related to sites protected on, and eligible for, both the State and National Register of Historic Places.

ENVIRONMENTAL IMPACTS

QUESTION 8:

The environmental impacts associated with the modification of the pump station (Public Baths Wastewater Pump Station Modification Draft Environmental Assessment, July, 1997) have been segmented from the environmental impacts associated with the force main replacement project (Public Baths Force Main Replacement Final Environmental Assessment, March 1996) and the newly-proposed Beachwalk Wastewater Pump Station Project.

Why have these three projects been segmented in spite of state and federal laws mandating compliance with full environmental impact determination for cumulative projects?

QUESTION 9:

The DEIA states that there are "several ironwood trees along Kalakaua Avenue and monkey pod trees outside the Honolulu Zoo that are designated as "exceptional trees". These trees will not be disturbed by the project." (3-9)*

To which project segment does this refer? In this instance the DEIA references a cumulative impact of the larger project. However, the DEIA does not define how no impact will occur. Please summarize how the 12-inch and 16-inch force main replacements interconnecting the two project segments will not impact the exceptional trees at these locations and how their fragile mature root systems will be avoided during the full scope of the cumulative project.

QUESTION 10:

The DEIA states that the project site's soil is comprised of "soils that are 'excessively drained and calcareous' found in narrow strips near the ocean. Typical samples are single grain. ...sandy and can reach to depths of more than 60 inches." In addition, the DEIA states that "The reliability of the (pump) station has slowly decreased with age." (3-3 and 4-1)

The sewer pump station expansion is proposed adjacent to densely populated Waikiki area beaches, which causes concern for future public health and safety because it is known that over time sewer line fracture and/or general diminishing of pump station and sewer line integrity occurs, releasing bacteria, viruses and toxins. This is known to cause marine recreational water quality standards to be chronically exceeded (See: F:MBWFP @ 3-45 and 5-18).

A. In view of the fact that wastewater pump station reliability slowly decreases with age, and that pipeline segments are proven to separate over time with joint deterioration, soil shift and ground movement, why is this wastewater pump station being retained in high-percolation soil conditions in such close proximity to the shoreline of a densely populated public beach area?

B. Is not the public health and safety a priority in City fiscal budgetary planning wherefore relocation of the facility away from the immediate shoreline would be paramount? (4-2)

C. Why is the pump station facility not proposed to be relocated to a site of similar elevation elsewhere in the Waikiki area?

SCOPE of PROPOSED PROJECT SEGMENT

QUESTION 11:

The DEIA states that "...demolition, earthmoving and other activities may result in a temporary impact on air quality... Dust control measures may include... covering open bodied trucks." (3-10)

Please define the scope of demolition and earthmoving planned for this proposed project.

QUESTION 12:

The DEIA states that the need to increase capacity of this facility is anticipated in order "to accommodate the additional flows due to the infiltration and inflow into the sewer collection system..." (3-1)

A. Please define the specific types of additional flows anticipated in the future due to infiltration and inflow into the sewer collection system.

B. Please specify the respective quantities of such flows over and above the current conditions as projected to be serviced by the proposed Public Baths facility expansion.

QUESTION 13:

The DEIA states that "Pump station capacity will be increased to meet the future peak design flow of 3.2 MGD. (2-1)

A. How is it determined that a capacity increase of 1.5 million gallons (88%) more per day will be required for future peak wastewater flow?

B. Please specify the future anticipated increase in capacity required for the pump station in millions of gallons per day (MGD) for presently unserved areas, undeveloped areas, the Waikiki Aquarium, and the Honolulu Zoo, respectively.

QUESTION 14:

The DEIA describes the scope of facility expansion as including "acquisition of 2,000 square feet of (park) land to enlarge the pump station parcel, providing vehicular access to the pump building and enabling installation of all equipment..." (2-4)

Please define specifically, what equipment, housing, fencing or other embedded structural components are planned to be visible outside and around the existing pump station building, what specific dimensions are contemplated for such respective objects, how much open space area will they consume, and at what height are they planned, respectively?

QUESTION 15:

The DEIA states that 2,000 square feet of park land will be needed for a grated cover and vehicular access to the pump station for operation and maintenance", and further states that the proposed expansion of the generator building will block vehicular access to the pump station (3-2). Moreover, the DEIA states that "maintenance personnel visit the pump station several times a day and the emergency generator is tested on a weekly basis by another crew" (3-14). However, the DEIA does not explain why vehicular access to the pump station is needed in the first place, as ample vehicular parking is available only steps away on Kalakaua Avenue. In addition, vehicles are prohibited from parking on adjacent park land and, if allowed to do so, would obstruct the protected significant view plane from Kapiolani Park to the shoreline.

- A. What is the purpose of the proposed vehicular parking?
- B. With the scope of improvements and modifications proposed for the pump station facility, will the facility continue to require that "maintenance personnel visit the pump station several times a day...?"

QUESTION 16:

The DEIA states that "The project site is located within the core area of the Diamond Head Special District... Renovation of the existing structures and new construction shall conform to the design controls set forth in the special district... controls include landscaping requirements, height limitations and architectural design review." (3-5)

- A. The DEIA shows on Figure 3.2 (3-6) that a zero-foot (0') height limit is stipulated for the park land where the pump station expansion is proposed to be situated. Is all structural and equipment expansion proposed for the park land adjacent to the existing pump station planned to be installed underground so as not to interfere with the view plane to the shoreline?
- B. How high will the proposed fencing be around the facility, and is a landscape screen planned around the fencing? Will the fence and landscape screen obstruct the significant view planes from the park to the shoreline, and from the shoreline to the park and Diamond Head?
- C. The landscape screen fronting the existing pump station facility has deteriorated considerably from neglect. What City department will be assigned to regular maintenance and irrigation of the landscaping required to screen this facility?

QUESTION 17:

The DEIA states that "Long term air quality may be impacted by... intermittent... emissions from the emergency generator..."; and, conversely, that "Emissions from the generator stack will have no significant impacts. (3-10)

Please define the difference between "impact" and "significant impact" in this instance.

QUESTION 18:

The DEIA states that "there is no record of complaints regarding odors emanating from the pump station." (3-9)

The DEIA ignores the sewage overflow at this location that occurred during the Honolulu Marathon on December 11, 1997.

In addition, the experience of the Kapiolani Park Advisory Council has been that, when the general public is confronted with an unpleasant circumstance in Kapiolani Park, most people avoid the area and many who would complain do not know who to contact. Even when encouraged to call 911 for complaints to police, the majority of average persons hesitate to do so. Therefore this type of complaint record-keeping is skewed at best.

Please provide a complete 5-year documented departmental record of a sewage spill in Kapiolani Park and b) periodical testing for odors at the pump station site, including wet well hydrogen sulfide emissions.

QUESTION 19:

The DEIA states that "The closest residence is situated approximately 950 feet away from the pump station and the generator noise level there is probably inaudible during the day (less than 50 dBA)." (3-10)

By stating only that the noise level is "probably inaudible", the DEIA exhibits guesswork and incomplete evaluation of noise level impact. This assumption appears to be made in the absence of verification documentation, charts and graphs of noise level impact from this facility at specific adjacent locations in the vicinity of the proposed project.

Please provide a certified noise level study documenting metered analysis at specific locations surrounding the facility, including that mentioned in the DEIA. Please provide accurate charts and graphs attendant to such documentation.

FINDINGS and REASONS REFUTING the DEA's ANTICIPATED DETERMINATION of "NO SIGNIFICANT IMPACT."

The DEA's presumption that the Environmental Assessment supports a Finding of No Significant Impact, and that there is no need to prepare an Environmental Impact Statement (DEA (r 5-1)), suffers grievous oversight for the following reasons as applicable to the Department of Health's Environmental Impact Statement Rules "Significance Criteria" (Title 11, Chapter 200, Section 11-200-12):

1. The proposed project will involve an irrevocable commitment to loss and destruction of a portion of the Kapiolani Park natural and cultural resource, including adjacent recreational lands protected by Kapiolani Park Trust provisions, and historic lands and structures protected by standing with the Register of Historic Places under the National Historic Preservation Act.
2. The proposed project will curtail the range of beneficial uses of the environment, including a) removal of a portion of a densely populated park recreation area and b) a potential future threat to adjacent shoreline water quality.
3. The proposed project will conflict with the state's long-term environmental policies, goals and guidelines under Chapter 344, I.R.S., including the following:

Land, water, mineral, visual, air, and other natural resources.

- A. Encourage management practices which conserve and fully utilize all natural resources;
- B. Encourage management practices which conserve and protect... open space areas;

Parks, recreation and open space.

- A. Establish, preserve and maintain scenic, historic, cultural, park and recreation areas, including the shorelines, for public recreational, educational and scientific uses;
- B. Protect the shorelines of the State from encroachment of manmade improvements, structures and activities;
- C. Promote open space in view of its natural beauty not only as a natural resource but as an enabling, living environment for its people.

The proposed project will conflict with court orders, including that City facilities are an inappropriate use of Kapiolani Park Trust lands, per sequential precedent that such land protected by charitable trust provisions is "constitutionally protected from alteration" (See: S.P. 89-015, 1991).

4. The proposed project will substantially affect the social welfare of the community by placing a public works facility on Kapiolani Park Trust lands frequented by residents and visitors alike, and protected in perpetuity by charitable Trust provisions for public recreation purposes.
5. The proposed project will involve a substantial degradation of environmental quality by encroaching on a protected historic landscape and consuming a portion of densely-populated public park recreation area.
7. The DEA has neither substantiated nor documented that the project will not cause long-term detrimental effects on air, or water quality, or ambient noise levels in the surrounding park and shoreline recreation area.
8. The proposed project will substantially affect scenic vistas and view planes identified in county and state plans and studies, including those from Kapiolani Park to the ocean, and from the shoreline to Kapiolani Park and Diamond Head.

As this cumulative project is a major public works undertaking, and as the above significant adverse impacts are of universal public interest and concern, it is therefore recommended that a full Environmental Impact Statement (EIS) be prepared for the Public Baths Wastewater Pump Station project.

CONCLUSION

Based on review and analysis of the information provided, the Kapiolani Park Advisory Council takes exception to the Applicant's position that "the proposed project does not have the potential to generate significant environmental impacts, and the need to prepare an Environmental Impact Statement is not foreseen." (DEIA (r 5-1) Clearly, the Public Baths Wastewater Pump Station has the potential to create adverse environmental impacts on, around and within the Kapiolani Park historic and cultural landscape and recreation area for the following reasons:

1. The Public Baths Wastewater Pump Station segment proposes a taking of Kapiolani Park Trust lands that are claimed to be needed for expansion and upgrade of the existing outdated pump station facility. Kapiolani Park lands are held under charitable Trust provisions that protect the land in perpetuity as a park for the people of Honolulu. As such charitable Trust provisions supersede city, state and federal legislation, the provisions of the Trust must remain in tact. In 1992, a Court ruling upheld that City facilities are an inappropriate use of Trust land.

Therefore, acquisition of the Kapiolani Park Trust lands set aside in perpetuity for public purposes would appear to not be possible. It is suggested that another location in Waikiki be considered.

2. Kapiolani Park was placed on the Hawaii State Register of Historic Places in 1992, and is thus an historic site and landscape protected under the National Historic Preservation Act and eligible for the National Register of Historic Places. However, the project proposes to encroach on protected park lands, and proposes to "merge the pump building and generator building, unifying the appearance of the two separate structures into one."

Therefore, the original stand-alone pump station building is proposed to be obliterated with attached structures, causing desecration and destruction of its historical architectural integrity.

As the proposed expansion project targets protected historic park land governed by charitable Trust provisions, this may fall subject to a federal National Historic Preservation Act Section 106 Review. The "Conceptual Development Alternatives" covered in the 1993 Mamala Bay Facilities Plan, a study of the water quality and waste treatment conditions mandated by Court consent decree, do not serve as an Environmental Impact Statement for this segment of the cumulative project because it does not address a taking of 2,000 square feet of Kapiolani Park Trust lands, nor does it address the facility expansion and reconfiguration of the old pump station building.

Therefore, all environmental impacts generated by the proposed project at the Public Baths area of Kapiolani Park would more properly be addressed in a full Environmental Impact Statement.

3. The sewer pump station expansion is proposed within high-percolation soil conditions adjacent to a densely populated ocean recreation area. As in the past, over time subsequent ground infiltration from deteriorating sewage infrastructure will impact the surrounding Kapiolani Park shoreline recreation area.

Therefore, placement of the proposed project segment in such close proximity to the Kapiolani Park shoreline recreation area causes concern for public health and safety.

4. The Draft Environmental Assessment fails to disclose and/or scientifically define specific impacts generated from the proposed scope of demolition and earthmoving during construction; obstruction of park open space and shoreline, park and Diamond Head viewplanes by structural components, fencing, or vehicular parking proposed for the project; existing and future generator noise and air pollutant emissions, and wastewater treatment odor emissions.

Therefore, an Environmental Impact Statement is recommended to provide a properly detailed evaluation of impacts generated by the proposed project is needed.

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DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU

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WPP 98-152

March 23, 1998

RECEIVED

MAR 26 1998

ENGINEERING CONCEPTS

Ms. Michelle Spalding Matson, Chairperson
Kapiolani Park Advisory Council
3902 Paki Avenue
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Draft Environmental Assessment (EA) for
Public Baths Wastewater Pump Station Modification
Honolulu, Oahu, Hawaii
TMK: 3-1-31:7

Thank you for your letter of October 18, 1997, regarding the Draft EA for the subject project. We appreciate your efforts in reviewing the document and offer the following response to your comments.

Ownership and Governing Instruments

1. Why does the DEA curiously confuse the facts concerning ownership and provisions governing the Public Baths beach and park area of Kapiolani Park?

There is a legal issue regarding the ownership of and/or authority over the adjacent land within TMK: 3-1-31:4. The court has not ruled on whether this parcel is part of the Kapiolani Park Trust lands. On page 3-2 of the Draft EA, the legal issue regarding the ownership issue is noted.

2.a. How does the DEA propose to accomplish this taking of 2,000 square feet of charitable Trust land when, by case precedent, government is precluded from superseding charitable trust provisions when such land is "constitutionally protected from alteration by legislation," as held by the U.S. Supreme Court in 1819 (Dartmouth College Trust vs. Woodward)?

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As stated previously, whether the lands in question are Trust lands has yet to be determined by the court.

b. What does the State Department of Land and Natural Resources have to do with "land acquisition" permits or approvals required for this proposed facility expansion project? (1-4)

If the court determines the land is in fact owned by the State of Hawaii, the DLNR Land Division is the State agency which must be contacted for the appropriate permits or approvals.

c. From whom does the City expect to acquire the adjacent park land?

The adjacent park land will be acquired from the State of Hawaii if ownership is so determined.

3. The DEA again ignores that the Court has held that City facilities are an inappropriate use of, and must be removed from, Trust lands (See: Circuit Court Special Proceedings No. 89-0015, 1991). Please provide a list of alternate locations for the wastewater pump station outside Trust land boundaries.

As a point of clarification, the Public Baths WWPS (TMK: 3-1-31:7) was designated for a sewage pump station by Executive Order No. 02741 on February 10, 1975. Judge Chun (on June 28, 1991) and Judge Yim (on December 29, 1994) ruled that the Public Baths WWPS parcel is not part of the Kapiolani Park Trust lands.

4. Why does the DEA contradict the facts here that Kapiolani Park Trust lands (known as the Public Baths beach park area) are also contiguous to the pump station on the lot's ewa and makai sides (1-2 and 1-3); and, as stated in elsewhere in the DEA, that "The project site is ... surrounded by the open space of public park ... recreational areas?" (3-1)

We concur that the Public Baths beach park is situated on the Ewa and makai sides of the pump station. However, we await a court ruling on whether the beach park is part of the Trust lands.

Use of Protected Park Lands

5.a. Please explain why the DEA flies in the face of the Kapiolani Park Trust deeds, state and federal historic site designations, and subsequent protected-site substantiation by the

State Historic Preservation office by ignoring the fact that this City public works project expansion is proposed for protected lands?

Coordination of the project with the State Historic Preservation Division (SHPD) is ongoing. The SHPD has determined that the proposed project is not subject to federal review under Section 106. In addition, the SHPD concurs with the architectural design of the proposed building modification.

6. *Please define (a) any anticipated active monitoring of construction activities by a qualified professional archaeologist; (b) whether this monitoring will be constant, intermittent or on-call; and (c) any and all action that might be taken if any archaeological deposits or human remains are encountered.*

We are committed to archaeological monitoring during construction. As stated in the Draft EA, monitoring during construction will be detailed in a monitoring plan which will be submitted to the State Historic Preservation Division for approval.

7. *Please provide an Environmental Impact Statement pertaining to the proposed project, including information on preservation of the architectural character and integrity of the pump station building in accordance with the National Historic Preservation Act as related to sites protected on, and eligible for, both the State and National Register of Historic Places.*

As stated previously, we are coordinating the project with the State Historic Preservation Division to ensure compliance with the state and federal regulations on this subject. Based on our discussions with SHPD, there are no significant impacts anticipated which would warrant preparation of an EIS.

Environmental Impacts

8. *Why have these three projects been segmented in spite of state and federal laws mandating compliance with full environmental impact determination for cumulative projects?*

The projects have not been segmented. All three projects (Beachwalk Wastewater Pump Station, Public Baths Wastewater Pump Station Modification, and Public Baths WWPS Force Main Replacement) were appropriately addressed in the *East Mamala Bay Wastewater Facilities Plan Final EIS* (December 1993). The EIS addressed the future municipal wastewater collection, treatment and disposal system associated with the Sand Island WWTP tributary area.

9. *To which project segment does this refer? In this instance the DEA references a cumulative impact of the larger project. However, the DEA does not define how no impact will occur. Please summarize how the 12-inch and 16-inch force main replacements interconnecting the two project segments will not impact the exceptional trees at these locations and how their fragile mature root systems will be avoided during the full scope of the cumulative project.*

The trees were identified in the *Public Baths WWPS Force Main Replacement Final EA*. Impacts/mitigation were addressed in that report. The trees will not be disturbed by the pump station modification since they are located beyond the limits of this project.

- 10.a. *In view of the fact that wastewater pump station reliability slowly decreases with age, and that pipeline segments are proven to separate over time with joint deterioration, soil shift and ground movement, why is this wastewater pump station being retained in high-percolation soil conditions in such close proximity to the shoreline of a densely populated public beach area?*

Your concerns emphasize the need for the proposed project. The purpose of the project is to overhaul the existing aged pump station facility and improve its reliability so that spills will not occur in the future. One of the proposed improvements is installation of pumps that can operate even if submerged in a flood. There will be greater public health concern if the proposed project is not built and the existing facility continues to operate as is.

- b. *Is not the public health and safety a priority in the City fiscal budgetary planning wherefore relocation of the facility away from the immediate shoreline would be paramount? (4-2)*

Public health and safety is a concern and the reason for the proposed project. Relocation of the pump station is not a feasible alternative.

- c. *Why is the pump station facility not proposed to be relocated to a site of similar elevation elsewhere in the Waikiki area?*

The fact remains that the existing underground network of sewers conveys the wastewater to the pump station location. Extending this pipe system to another location is not practical. Perhaps the only alternatives would be construction of a new station within the neighboring Public Baths Beach Park or across the street within Kapiolani Park. We believe these alternatives are less desirable.

Scope of Proposed Project Segment

11. Please define the scope of demolition and earthmoving planned for this proposed project.

Demolition activities include removal of the existing fence, flow tube box and portions of the existing structures to facilitate new construction. Earthmoving or grading includes trenching to install the new pipes and equipment, and reshaping the surface soils for the new building expansion foundation. Demolition and earthmoving activities will be detailed in the construction documents.

12.a. Please define the specific types of additional flows anticipated in the future due to infiltration and inflow into the sewer collection system.

Flow projections for the project were addressed in the *Preliminary Engineering Report (PER) for the Public Baths Wastewater Pump Station Modification*. A pre-final version of this PER dated May 1997 may be reviewed at the department office.

b. Please specify the respective quantities of such flows over and above the current conditions as projected to be serviced by the proposed Public Baths facility expansion.

Please refer to the PER for information on flow quantities.

13.a. How is it determined that a capacity increase of 1.5 million gallons (88%) more per day will be required for future peak wastewater flow?

Please refer to the PER for information on flow quantities.

b. Please specify the future anticipated increase in capacity required for the pump station in millions of gallons per day (MGD) for presently unsewered areas, undeveloped areas, the Waikiki Aquarium, and the Honolulu Zoo, respectively.

Please refer to the PER for more information on flow quantities.

14. Please define specifically, what equipment, housing, fencing, or other embedded structural components are planned to be visible outside and around the existing pump station building; what specific dimensions are contemplated for such respective objects, how much open space area will they consume, and at what height are they planned, respectively?

Proposed exterior improvements which will be visible (above ground) include: new flow meter housing; connection of the pump house building and emergency generator building; expansion of the emergency generator room; and construction of an accessible access ramp and new exterior entrance to the pump room. A flow meter and portable pump connection will be contained within the new flow meter housing. New construction proposed within the additional 2,000 SF which will be visible above ground are: the perimeter fence (6 ft high); the flow meter housing (approximately 18 ft long X 7 ft wide X 0.5 ft above ground), surrounded by a 3 ft high railing; and the portable pump connection pipe which will surface above the flow meter housing. Refer to Figure 2.5 of the Draft EA for an illustration of the proposed improvements. Actual dimensions will not be available until the project is designed.

15.a. What is the purpose of the proposed vehicular parking?

The proposed vehicle parking is required for service or maintenance vehicles which visit the pump station on a daily basis. Vehicular access to the door of the pump building is required for equipment removal and servicing.

b. With the scope of improvements and modifications proposed for the pump station facility, will the facility continue to require that "maintenance personnel visit the pump station several times a day...?"

Yes.

16.a. The DEA shows on Figure 3.2 (3-6) that a zero-foot (0') height limit is stipulated for the park land where the pump station expansion is proposed to be situated. Is all structural and equipment expansion proposed for the park land adjacent to the existing pump station planned to be installed underground so as not to interfere with the view plane to the shoreline?

No. Some equipment will be located above grade. According to the *Land Use Ordinance*, the DLU director may grant exceptions to special district height limits, not to exceed the height regulations for the underlying zoning district. In this case, the site is zoned General Preservation (P-2) which is subject to a height regulation of 15 feet (25 feet with setbacks). The proposed equipment and protective housing would generally be located close to the ground and should not interfere with view planes.

b. How high will the proposed fencing be around the facility, and is a landscape screen planned around the fencing? Will the fence and landscape screen obstruct the significant view planes from the park to the shoreline, and from the shoreline to the park and Diamond Head?

Ms. Michelle Spalding Matson
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Page 7

The proposed fence will be 6 feet high, with a landscaped hedge. View planes will not be significantly impacted.

- c. *The landscape screen fronting the existing pump station facility has deteriorated considerably from neglect. What City department will be assigned to regular maintenance and irrigation of the landscaping required to screen this facility?*

The Department of Wastewater Management will be responsible for maintenance of the landscape fronting the pump station.

17. *Please define the difference between "impact" and "significant impact" in this instance.*

An "impact" is a change or occurrence which results from the project development. Typically, there are many impacts associated with a project. Impacts may be positive or negative. The significance of an impact is often relative, when compared to the existing conditions. A "significant impact" is typically a major change or occurrence, usually negative, which results from the project.

18. *Please provide a complete 5-year documented department record of a) sewage spills in Kapitolani Park and b) periodical testing for odors at the pump station site, including wet-well hydrogen sulfide emissions.*

According to the *Spill Reduction Action Plan Engineering Report*, dated November 1995, there were no reported spills at the pump station from 1989 to 1993. This report is available for review. Periodic testing is not conducted for odors at the pump station or hydrogen sulfide emissions from the wet well.

19. *Please provide a certified noise level study documenting metered analysis at specific locations surrounding the facility, including that mentioned in the DEA. Please provide accurate charts and graphs attendant to such documentation.*

The existing acoustical conditions at the pump station were evaluated by Y. Ebisu and Associates, Acoustical and Electronic Engineers. There are no plans to prepare additional acoustical studies. The proposed sound abatement measures will reduce existing noise levels as disclosed in the Draft EA.

We acknowledge your view of the project with respect to the significance criteria. We recognize there is a legal issue regarding ownership of this parcel. Please be informed that the Department of the Corporation Counsel is actively pursuing this issue of land ownership. The issues relating to historical significance, public health and environmental impacts have been addressed. The need for additional developmental permits has been disclosed. It is our determination that the project will have no significant impact, therefore, does not warrant preparation of an EIS.

Ms. Michelle Spalding Matson
March 23, 1998
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A copy of your comment letter and this response will be included in the Final EA. Should you have any questions, please contact Mr. Sung Ho Lai at 527-5398.

Sincerely,



KENNETH E. SPRAGUE
Director

cc: ✓ Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control

0000 0023 2827

0000 0023 2628

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
850 SOUTH KING STREET
HONOLULU, HAWAII 96813



KENNETH E. SPRAGUE, P.E., P.D.
DIRECTOR
CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 98-307

June 3, 1998

Ms. Michelle Spalding Matson, Chairperson
Kapiolani Park Advisory Council
3902 Paki Avenue
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Draft Environmental Assessment (EA) for
Public Baths Wastewater Pump Station Modification
Honolulu, Oahu, Hawaii
TMK: 3-1-317

The Kapiolani Park Advisory Council had previously expressed concern over the proposed acquisition of a 2,000 sq. ft. parcel of park land for the proposed pump station modification. After careful reevaluation, the Department of Wastewater Management has decided to forego the previously proposed land acquisition for this project. The proposed pump station improvements will be constructed underground, outside of the pump station fence similar to the existing flow box presently located adjacent to the pump station. An approval of construction from the Department of Land and Natural Resources will be sought for these underground facilities. Construction activities will also be coordinated with the Kapiolani Park Preservation Society.

Revisions to the proposed project will be addressed in the Final Environmental Assessment, presently being prepared by our consultant. Should you have any questions, please contact Mr. Sung Ho Lai at the Division of Planning and Service Control at 527-5398.

Sincerely,

CHERYL K. OKUMA-SEPE
KENNETH E. SPRAGUE
Director

cc: ✓ Kenneth Ishizaki, Engineering Concepts, Inc.
Jeyan Thirugnanam, Office of Environmental Quality Control