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H-3 Retention of Access Roads
North Halawa Valley
Haiku Valley

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IN REPLY REFER TO:
HWY-D (H3)
2.1849

NOV 24 1998

TO: GARY GILL, DIRECTOR
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

FROM: KAZU HAYASHIDA *KJ*
DIRECTOR OF TRANSPORTATION

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT
INTERSTATE ROUTE H-3
RETENTION OF CONSTRUCTION ACCESS ROADS
NORTH HALAWA VALLEY AND HAIKU VALLEY
CITY AND COUNTY OF HONOLULU, OAHU, HAWAII

The State of Hawaii Department of Transportation, Highways Division (HDOT) has reviewed the comments received during the 30-day public comment period, which began on October 8, 1998. HDOT has determined that this project will not have significant effects and has issued a FONSI. Please publish this notice in the December 8, 1998 OEQC Environmental Notice.

We have enclosed a completed OEQC Publication Form and four copies of the Final EA. Our consultant, Parsons Brinckerhoff-Hirota Associates, will e-mail the project summary. If you have any question, please contact Karen Chun, Project Manager, at 587-2125.

Enclosures

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Roads, North Halawa Valley and Haiku Valley

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November 1998

**INTERSTATE ROUTE H-3
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
O'AHU, HAWAI'I**

**Final Environmental Assessment /
Finding of No Significant Impact**

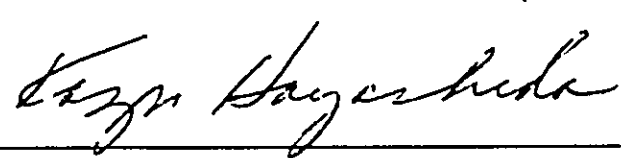
Prepared Pursuant to
Hawaii Revised Statutes, Chapter 343
and
Hawaii Administrative Rules, Title 11, Chapter 200

by the

State of Hawaii Department of Transportation
Highways Division

11/24/98

Date of Approval



Kazu Hayashida, Director
State of Hawaii Department of Transportation

The State of Hawaii Department of Transportation, Highways Division (HDOT) proposes to retain existing construction access roads in North Halawa Valley and Haiku Valley. These access roads were used to construct Interstate Route H-3, including the one-mile long Tetsuo Harano Tunnels. HDOT wants to retain the access roads for its bridge inspection and highway maintenance program of the Interstate. This proposal is in response to Condition I.15. of H-3's conservation district use permit (CDUP), "upon completion of the construction of H-3 through North Halawa Valley, the construction access road shall be removed and to the extent possible, the affected areas shall be restored to its natural state." This condition was proposed by HDOT because at the time of the CDUP process in 1983 it was believed that the access roads in the conservation district would not be needed after H-3 is completed. Since then, however, circumstances have changed that required HDOT to reconsider this position. Specifically, substantially more viaduct or bridge structures were used than originally intended. HDOT will submit a request to the Board of Land and Natural Resources to remove Condition I.15. from the H-3 CDUP. This Final EA / Finding of No Significant Impact indicates North Halawa Valley and Haiku Valley have been recovering from the construction of H-3, and that the proposed action would not affect this restoration. The only alternative to the proposed action is to remove the access roads and to the extent possible, restore the valleys to their pre-H-3 condition. Construction of this alternative would be a major undertaking and would once again disturb the environmental conditions of these valleys. Furthermore, when maintenance or minor construction is needed in the future, HDOT would have to clear another road to the construction site, which would disturb the valley(s) yet again.

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Executive Summary

This Final Environmental Assessment (EA) is a publication of the State of Hawai'i Department of Transportation, Highways Division (HDOT). This document was prepared under the requirements of Chapter 343 of the Hawai'i Revised Statutes; and Title 11, Chapter 200 of the Hawai'i Administrative Rules (HAR).

S.1 PROJECT DESCRIPTION AND PURPOSE

HDOT proposes to retain existing construction access roads in North Halawa Valley and Haiku Valley. These access roads were used to construct Interstate Route H-3, including the one-mile long Tetsuo Harano Tunnels. The project location is shown on Figure S-1. HDOT wants to retain the access roads for its bridge inspection and highway maintenance program of the Interstate. Both access roads are partially located in the State conservation district.

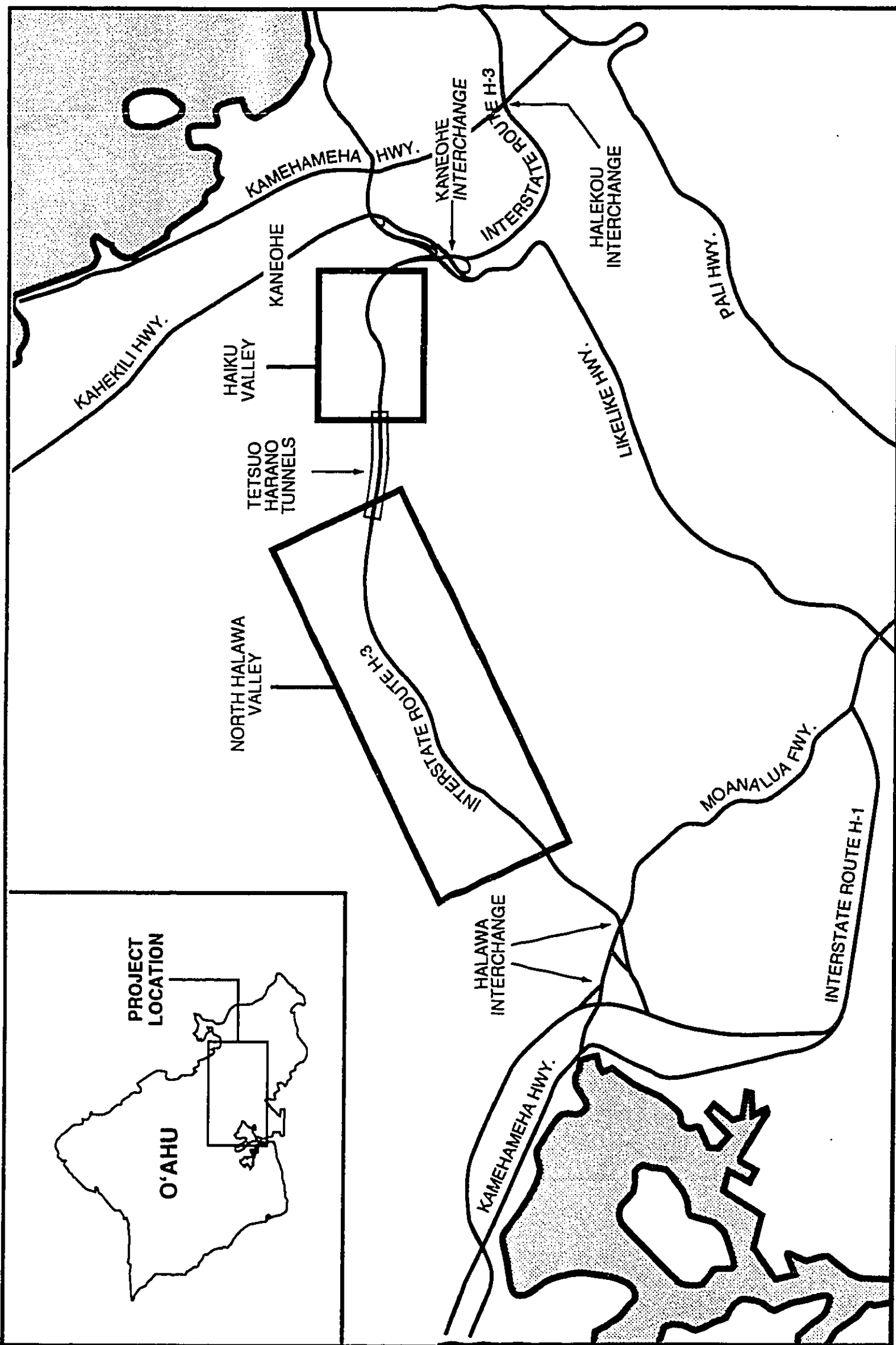
H-3's conservation district use permit (CDUP OA-7/27/81-1405) specified in Condition I.15., "upon completion of the construction of H-3 through North Halawa Valley, the construction access road shall be removed and to the extent possible, the affected areas shall be restored to its natural state." Retention of the Haiku Valley access road is included in this proposal despite not being specifically mentioned for removal in CDUP.

Condition I.15 was proposed by HDOT because at the time of the CDUP process in 1983 it was believed that the access road in North Halawa Valley would not be needed after H-3 is completed. Since then, however, circumstances have changed that required HDOT to reconsider this position. Specifically, the original alignment was changed to an alignment that places the freeway directly above the meandering North Halawa Stream. This substantially increased the use of viaduct or bridge structures than originally intended, which also changed the freeway's inspection and maintenance program. Bridge structures require periodic inspection, and invariably, maintenance or minor construction.

S.2 BACKGROUND

Despite the signing of H-3's Record of Decision in November 1982 and the granting of the CDUP in November 1983, construction of H-3 was effectively blocked by order of the Court until 1987. When approved to proceed, HDOT constructed the access roads in North Halawa Valley and Haiku Valley so that it could continue construction of H-3 (portions of H-3 on the windward side were completed earlier). The North Halawa Valley and Haiku Valley construction access roads were completed in March 1989 and June 1990, respectively. The roads were indispensable because they allowed several sections of freeway to be constructed simultaneously, and therefore substantially reduced the total construction duration and cost. H-3 opened for service in December 1997.

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Project Area
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
 Final Environmental Assessment
FIGURE S-1

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S.3 PLANNING PROCESS

For HDOT to retain the access roads in North Halawa Valley and Haiku Valley, the Board of Land and Natural Resources (BLNR) has to amend the CDUP OA-7/27/81-1405 by removing Condition I.15. After consultation with the Department of Land and Natural Resources, Land Management Division (DLNR-LM) and the Office of Environmental Quality Control (OEQC), HDOT decided that preparation of an EA would be the appropriate mechanism to petition the BLNR for the amendment.

HDOT completed a Draft EA in October 1998, and distributed copies to the public libraries nearest to the project site and 18 federal, State and City and County of Honolulu agencies. The availability of the Draft EA was announced in the October 8, 1998 publication of the Environmental Notice, which initiated the start of the 30-day public comment period. Based on written comments on the proposed action and Draft EA and an analysis of anticipated impacts in relation to Significance Criteria specified in HAR 11-200-12, the HDOT has declared a Finding of No Significant Impact (FONSI) for the proposed action.

Following announcement of this Final EA / FONSI in the Environmental Notice, HDOT will submit a formal request to the BLNR to remove Condition I.15. from CDUP OA-7/27/81-1405.

S.4 ALTERNATIVES

There are only two possible alternatives: (1) the proposed action; or (2) an alternative that would remove the access roads, and restore the affected areas, as best as possible, to their conditions before the H-3 construction.

S.4.1 Proposed Action

The proposed action is to retain H-3's construction access roads in North Halawa Valley and Haiku Valley. Both roads are asphalt-paved and are typically 24 feet wide. The North Halawa Valley access road is approximately five miles long spanning the floor of the valley from a quarry near Halawa Interchange to the exploratory tunnel of the Tetsuo Harano Tunnels. The Haiku Valley access road is approximately two miles long, and is located adjacent to H-3 mauka (southwest to south) of Castle Hills Subdivision, Kaneohe State Hospital, Hokulele Subdivision, and the decommissioned OMEGA navigation station. Access to the Haiku Valley access road is through a Board of Water Supply maintenance road. Existing fencing and gates were installed as an interim measure to prevent unauthorized access during H-3 construction. Retaining the fencing and gates is also proposed so that HDOT can continue to prevent unauthorized access.

If allowed to retain the access roads, HDOT will evaluate the condition of the existing 24 temporary construction bridges (21 in North Halawa Valley and three in Haiku Valley) along the access roads, and if necessary, upgrade certain bridges to current safety standards. HDOT also plans to raise the vertical profile of 1,400 feet of the North Halawa Valley access road to

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flatten an adjacent slope, which is a long term solution to a recurrent erosion problem in this area.

HDOT will allow personnel from certain agencies to use the roads, such as staff from the Office of Hawaiian Affairs who would enter North Halawa Valley to maintain and restore the valley's archaeological/cultural sites. Also, the U.S. Geological Survey monitors North Halawa Stream flow, and the State of Hawaii Department of Land and Natural Resources conducts resource management activities in the valleys. The general public will not be allowed access. However, access for traditional cultural practices is currently and will continue to be allowed.

S.4.2 Remove Roads Alternative

The Remove Roads alternative (RRA) involves the extraction of the construction access roads in North Halawa Valley and Haiku Valley, and to the extent possible, restoring the areas affected to their natural state before the access roads were constructed. Walking trails along the freeway at both valleys would be constructed for HDOT personnel to conduct their inspection work. The estimated cost of the RRA is \$10 million. If the BLNR denies HDOT's CDUP amendment request, the RRA would be implemented.

S.5 IMPACTS AND MITIGATION

From 1987 to 1997, the physical environment of North Halawa Valley and Haiku Valley was affected by the construction of the access roads and H-3. However, in the short time since construction was completed, the valleys have been recovering naturally and with the help of H-3 environmental mitigation measures, such as re-planting and erosion controls. At many locations affected by construction, vegetation has begun to propagate.

Construction under the RRA would be a major undertaking that would involve the clearing and grubbing of existing vegetation; removal of erosion control measures; demolition and removal of pavement; and substantial earthwork activities (e.g. slope excavation, grading and backfilling). It would once again disturb the environmental conditions of North Halawa Valley and Haiku Valley. If required to implement the RRA, HDOT would require the contractor to implement many of the mitigation measures used during the H-3 construction. Furthermore, when maintenance or minor construction is needed in the future, HDOT would have to clear another road to the maintenance or construction site, which would disturb the valley(s) once again.

The proposed action will not affect the long-term restoration of the valleys. The access roads will not affect water resources, native plant species and fauna species in the valleys because of restricted vehicular access on the access roads. The access roads will have beneficial effects. Specifically, the North Halawa Valley access road will facilitate efforts to restore and preserve archaeological/cultural sites in the Valley. Also, they will make it unnecessary for HDOT to construct another access road when maintenance or minor construction is needed in the future. If allowed to retain the roads, HDOT will use the roads to conduct its bridge inspection and highway maintenance program. HDOT will also monitor the erosion control measures that were installed along the access roads.

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Chapter 1 Description of the Proposed Action

1.1 PROJECT DESCRIPTION AND LOCATION

The State of Hawai'i Department of Transportation, Highways Division (HDOT) proposes to retain existing construction access roads in North Halawa Valley and Haiku Valley. These opposite-side valleys of the Ko'olau Mountain Range were used as the corridor for Interstate Route H-3, which opened to public traffic in December 1997 (see Figure 1-1). The two-lane asphalt-paved access roads were built in the late 1980s, and were used to construct H-3, including the freeway's twin-portal, one-mile long Tetsuo Harano Tunnels.

North Halawa Valley is one of the Ko'olau's many deep, elongated, leeward (southwest) valleys. The construction access road runs along the valley floor from a quarry located near Halawa Interchange to the entrance of the exploratory tunnel of the Tetsuo Harano Tunnels (see Figure 1-2). The valley is largely undeveloped, except for H-3 and industrial land uses at its lower (southwest) section. Landowners of the valley include the City and County of Honolulu Board of Water Supply, the Queen Emma Foundation and HDOT. HDOT took possession of the valley from ridge to ridge at the forest reserve line (see Figure 1-2) to the back of the valley on May 3, 1993 in order to preserve and protect archaeological and cultural sites (see Section 1.2.4). Within the conservation district, HDOT owns or has possession of all sections of the North Halawa Valley access road.

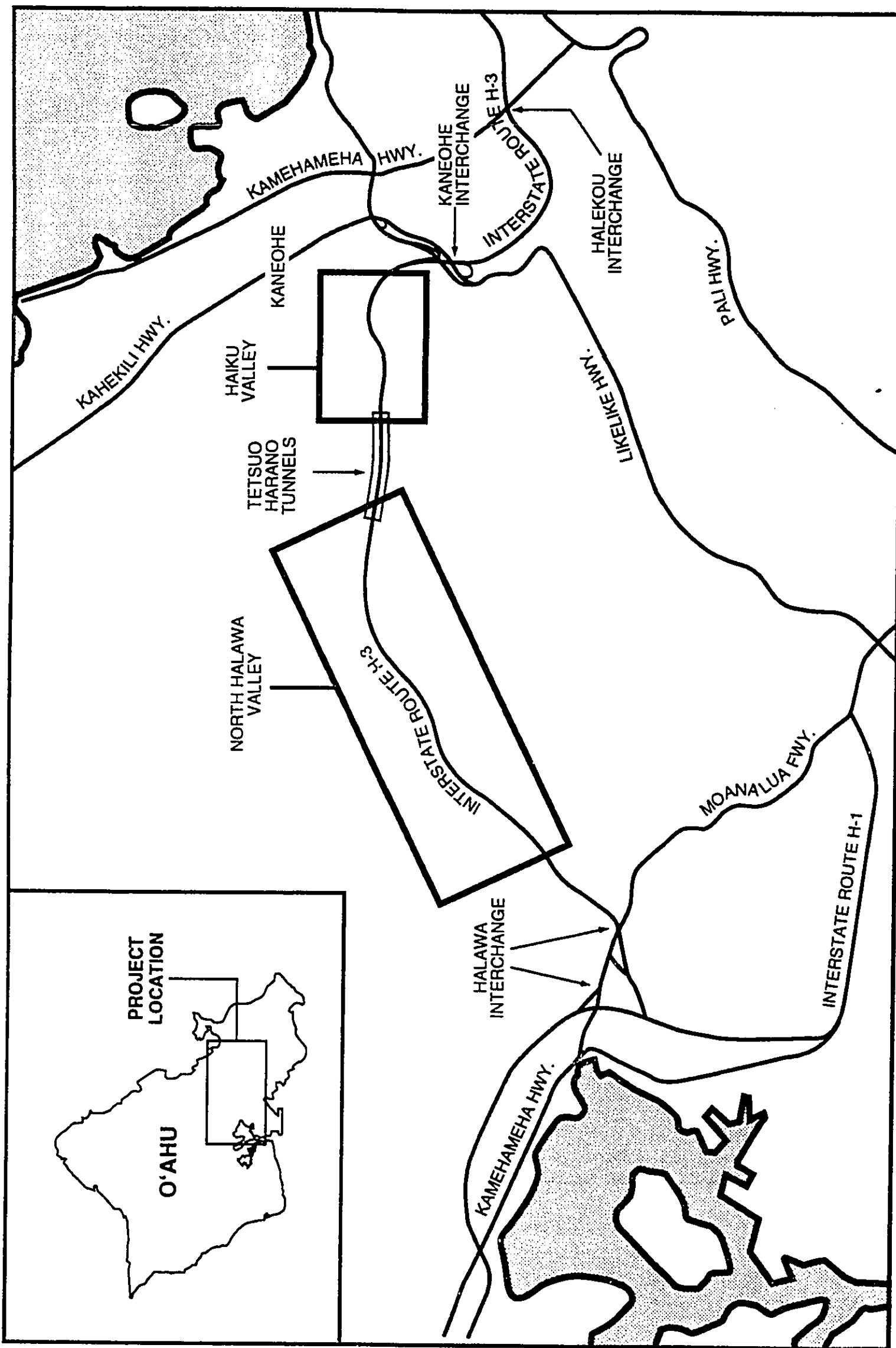
Haiku Valley is one of the Ko'olau's windward (northeast) amphitheater-headed valleys. These types of valleys are characterized by near vertical semi-circular valley heads with narrow sharp ridges. The construction access road is located adjacent to H-3, mauka (southwest to south) of Castle Hills Subdivision, Kaneohe State Hospital, Hokulele Subdivision, and the decommissioned OMEGA navigation station (see Figure 1-3). The lower (northeast) portion of Haiku Valley is developed, mostly with residences. The upper portion of the valley is largely undeveloped except for the vacant OMEGA station, which was operated by the U.S. Coast Guard. HDOT already owns or is in the final stages of obtaining a transfer of land or perpetual easement for H-3 and the access road. The perpetual easement is for sections of H-3 and the access road within parcels owned by the Coast Guard. This land will be conveyed to the Department of Hawaiian Home Lands (DHHL). The perpetual easement allows HDOT to use the access road for inspection and maintenance purposes.

1.2 HISTORY AND BACKGROUND

1.2.1 Interstate Route H-3: Conception to Completion

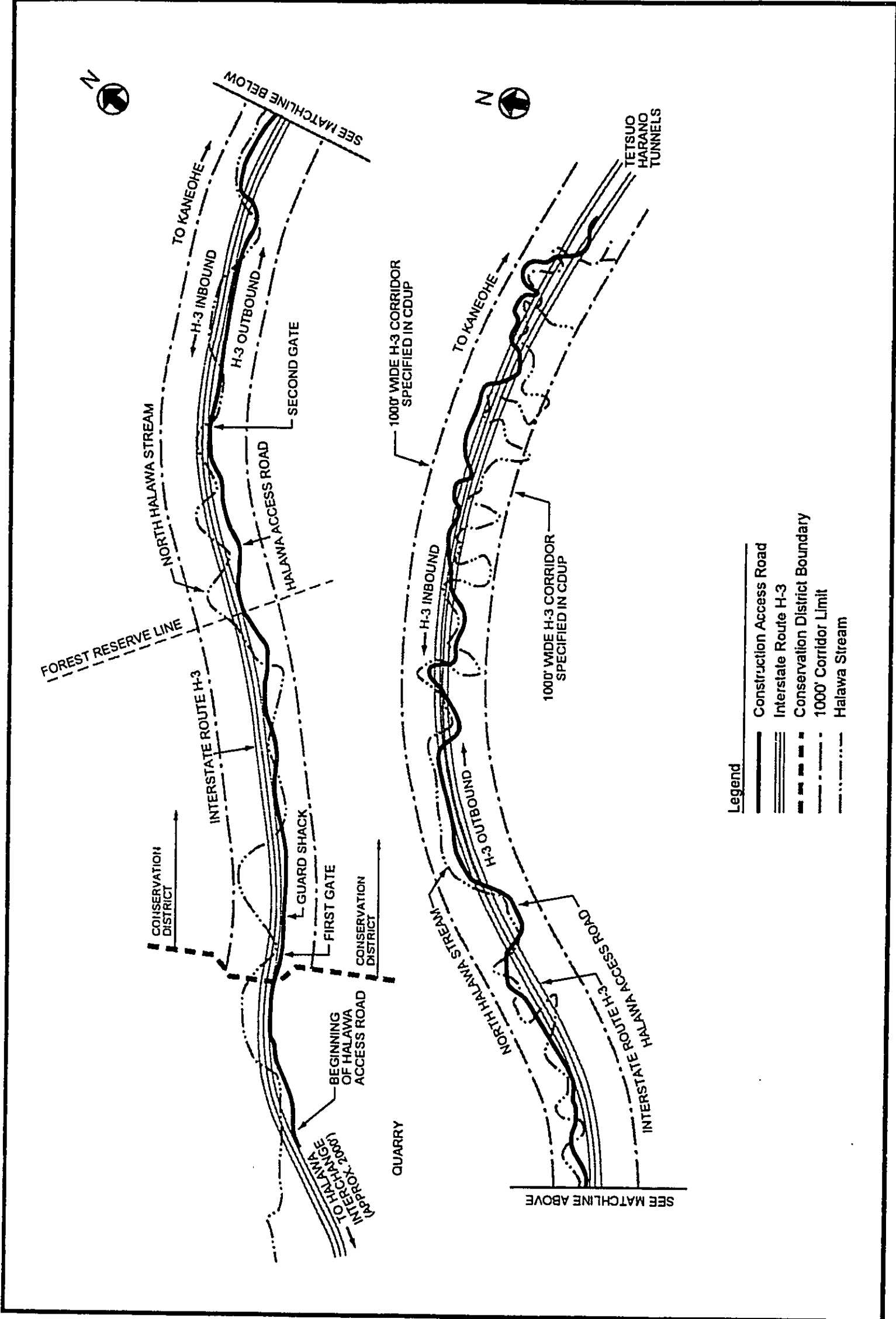
Hawaii's Interstate Route H-3 was originally conceived shortly after statehood under the Federal Highway Act of 1956 along with Routes H-1 and H-2, to be part of an interstate system that would form the backbone of O'ahu's roadway network (see Figure 1-4). Interstate Route H-1 is an east-west (Diamond Head - Ewa) freeway from Kahala to Kapolei. Interstate Route

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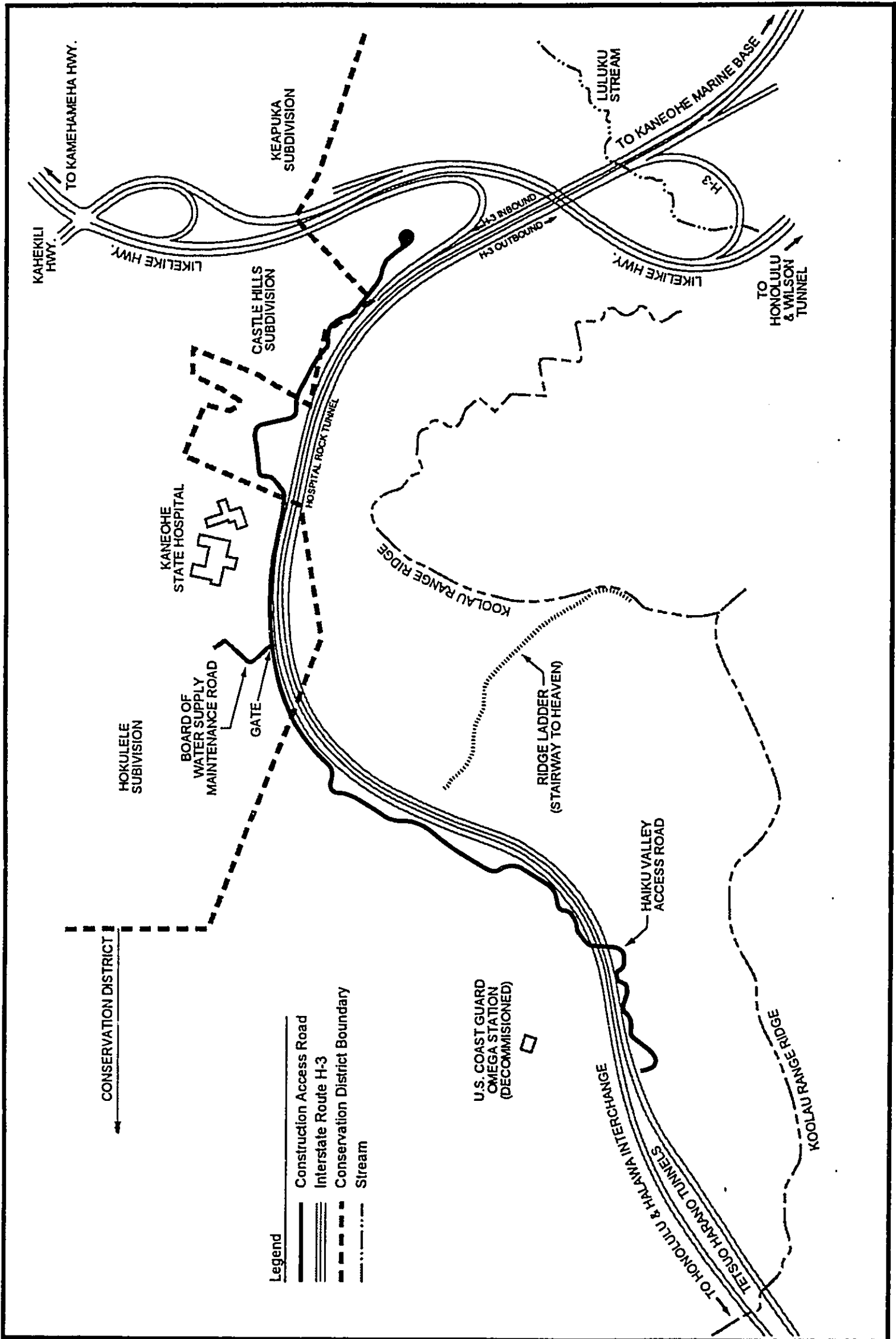
Project Area
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
Final Environmental Assessment
FIGURE 1-1

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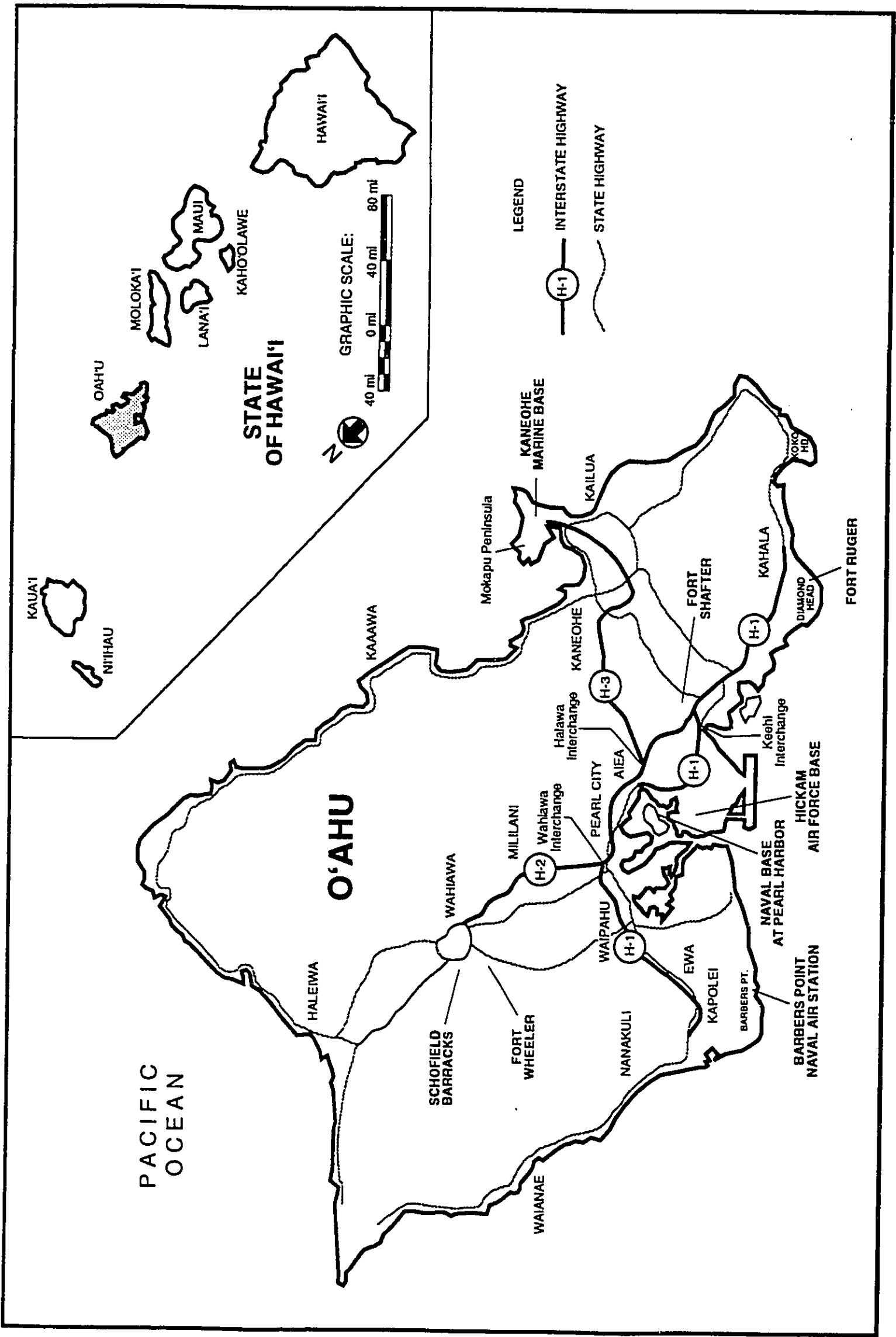
North Halawa Valley Construction Access Road
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
 Final Environmental Assessment
FIGURE 1-2

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Haiku Valley Construction Access Road
RETENTION OF CONSTRUCTION ACCESS ROADS
NORTH HALAWA VALLEY AND HAIKU VALLEY
Final Environmental Assessment
FIGURE 1-3

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O'ahu Interstate Freeway System
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
Final Environmental Assessment
FIGURE 1-4



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H-2 is a north-south (mauka-makai) freeway from Waiawa Interchange to Wahiawa. Interstate Route H-3 is a trans-Ko'olau freeway from Mokapu Peninsula to Halawa Interchange. Together, the O'ahu interstate system links major military bases on O'ahu: Fort Ruger near Diamond Head, Hickam Air Force Base, the Naval Base at Pearl Harbor, Schofield Barracks in central O'ahu, and Kaneohe Marine Base. Interstate Routes H-1 and H-2 were completed in the 1970s (the final section of Interstate H-1, Ke'ehi Interchange, opened for service in 1986), and Interstate Route H-3 opened for service in December 1997.

In the early 1970s, an environmental impact statement (EIS) for H-3 identified Moanalua Valley, one of the Ko'olau's southwest (leeward) valleys, as the preferred corridor for H-3. However, the HDOT later decided to consider alternative corridors along the Ko'olau Range after the discovery of archaeological sites that later led the valley to be listed in the National Register of Historic Places. A Supplemental EIS, completed in 1980, identified North Halawa Valley as the preferred corridor. A second Supplemental EIS was completed in 1982 because additional information had to be disclosed regarding the OMEGA navigation station and Ho'omaluhia Park in Kaneohe. Shortly thereafter, the project's Record of Decision was signed in November 1982.

Legal challenges lasting from 1982 to 1987 effectively stopped all progress on the project. One of the central issues stopping H-3 was an interpretation of a Section 4(f) use of Ho'omaluhia Park. Section 4(f) is from the Department of Transportation Act. It permits the use of land for a transportation project from a publicly-owned public park, recreation area, wildlife and waterfowl refuge, or a historic site only if there is no feasible and prudent alternative to such use, and the project includes all possible planning to minimize harm to the property resulting from such use. After exhausting all legal remedies, the State of Hawai'i appealed to Congress to intervene and allow construction of H-3. In 1987, Congress and the President agreed with the State, and exempted H-3 from the provisions of Section 4(f) because of the two decades of planning coordination between the freeway and the park.

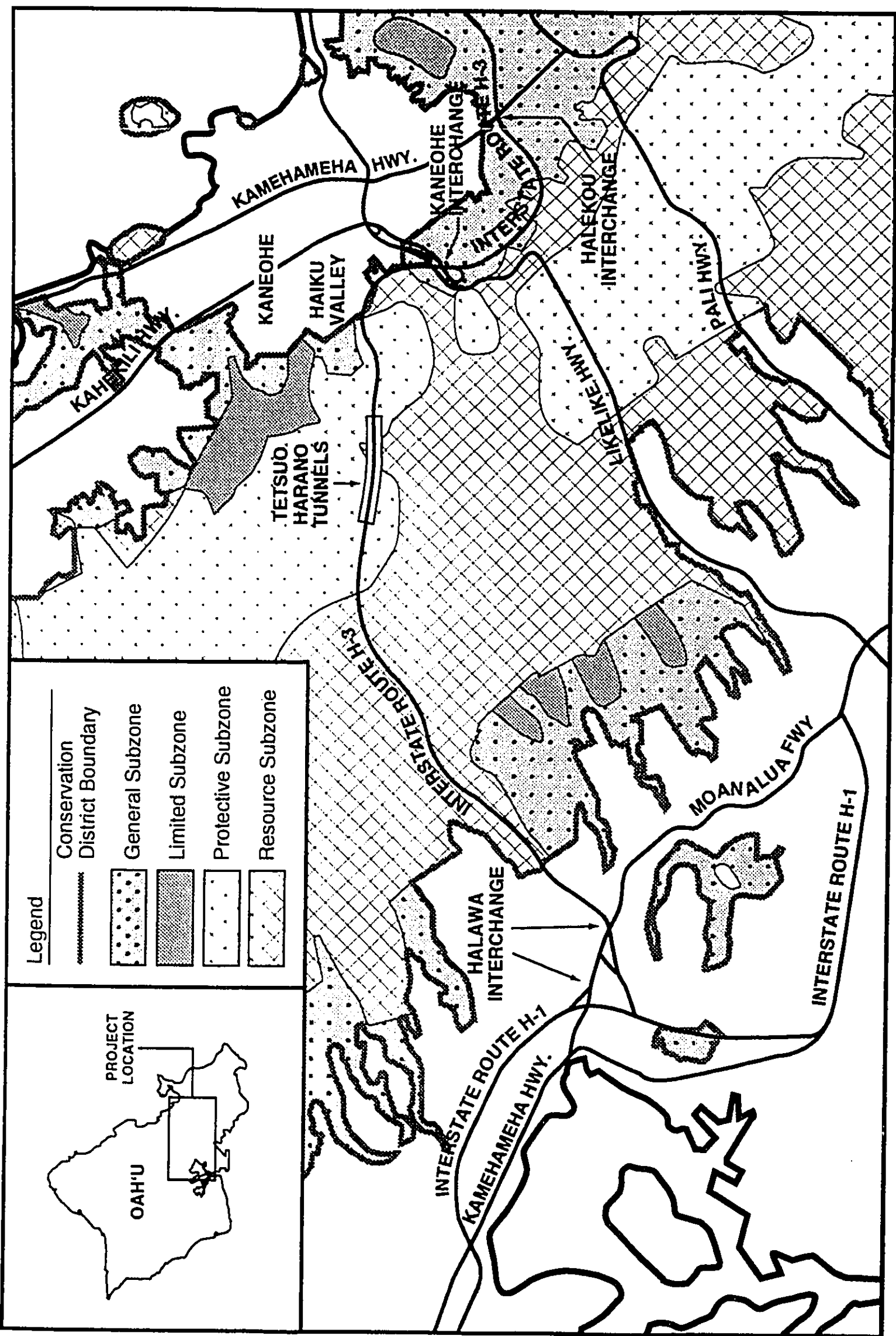
A third Supplemental EIS was completed in 1987 because a large archaeological site was discovered near the H-3 Kaneohe Interchange area. This discovery led to a signing of a Memorandum of Agreement (MOA) per Section 106 of the National Historic Preservation Act.

With the legal challenges resolved in 1987, HDOT proceeded with the construction of H-3. The four-lane freeway opened for service in December 1997 (the section of H-3 from Halekou Interchange to Mokapu opened in the late 1980s).

1.2.2 Conservation District Use Permit

As shown on Figure 1-5, H-3 traverses lands designated conservation by the State Land Use Commission through North Halawa Valley, Haiku Valley and Kaneohe. Pursuant to Hawai'i Revised Statutes (HRS) Chapter 205 and the Hawai'i Administrative Rules (HAR) Title 13 Chapter 2 (now HAR Title 13 Chapter 5), HDOT submitted a Conservation District Use Application (CDUA OA-7/27/81-1405) for an amendment to Conservation District Use Permits (CDUP OA-2/20/75-648 and CDUP OA-3/27/75-654) granted by the Board of Land and Natural Resources (BLNR) on May 12, 1975. The 1975 CDUPs were for an alignment through Haiku Valley and Moanalua Valley (see Section 1.2.1). The switch in corridors from Moanalua Valley

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Conservation District
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
 Final Environmental Assessment
FIGURE 1-5



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to North Halawa Valley shifted the windward portal approximately 1,100 feet east in Haiku Valley.

CDUA OA-7/27/81-1405 specified a conservation district use of approximately 797 acres in North Halawa Valley, which was based on a 1000-foot wide corridor (see Figure 1-2). Although it was estimated that Interstate Route H-3 would require approximately 136 acres through the valley, the wider corridor was specified because of the unknown topographic and environmental conditions of the undeveloped the valley. The wider corridor provided project designers flexibility in establishing the alignment based on ground and other environmental conditions.

The BLNR approved CDUA OA-7/27/81-1405 on January 8, 1982. However, the First Circuit Court, State of Hawai'i, ordered the BLNR to hold a contested case hearing, which rendered the January 8, 1982 CDUP null and void. The contested case hearing was held on September 12 through 15, 1983 and October 12, 1983. On November 18, 1983, the BLNR again approved CDUA OA-7/27/81-1405, stating that "substantial public benefit would result from the construction of Interstate Route H-3." The BLNR also noted that "(adverse) impacts will result to the conservation district as a result of Interstate Route H-3." Therefore, conditions were specified in the CDUP so that adverse impacts would be mitigated. One of the conditions stated:

- Condition I.15.: "upon completion of the construction of H-3 through North Halawa Valley, the construction access road shall be removed and to the extent possible, the affected areas shall be restored to its natural state."

Condition I.15 was proposed by HDOT because at the time of the CDUA process in 1982-83 it was believed that the access road in North Halawa Valley would not be needed after construction of H-3. The access road was included in the CDUA because the H-3 project was at an impasse in 1983. Although a conceptual alignment was developed, detailed design could not be completed without precise topographic and environmental information of the valley, and the only way to get this information was to build an access road. Furthermore, work on the trans-Ko'olau tunnel could not be initiated without the access roads.

As described in Section 1.4, the original conceptual alignment was changed to an alignment that places the freeway directly above the meandering North Halawa Stream. Because of this re-alignment, substantially more viaduct or bridge structures were constructed than originally intended, which also changed the freeway's inspection and maintenance program. Therefore, in the interest of public safety, HDOT has reconsidered its 1983 proposal that created Condition I.15. More information on the proposed action's purpose and need can be found in Section 1.4.

HDOT will provide the BLNR with metes-and-bounds maps of Interstate Route H-3's right-of-way in the conservation district after resolution of Condition I.15.

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1.2.3 Construction Access Roads

As described in Section 1.2.1, construction of H-3 was blocked by order of the Court until 1987. Following the act by Congress (see Section 1.2.1) and after receiving its 1983 CDUP, HDOT proceeded to construct the access roads in North Halawa Valley and Haiku Valley so that it could continue construction of H-3 (certain portions of H-3 on the windward side were already completed). The North Halawa Valley and Haiku Valley construction access roads were completed in March 1989 and June 1990, respectively.

The roads facilitated access in the North Halawa Valley and Haiku Valley for vehicles carrying construction materials, equipment and personnel. Most importantly, the roads allowed several sections of freeway to be constructed simultaneously, and therefore substantially reduced the total construction duration and cost. For example, the access roads allowed the construction of the twin tunnels at the same time the segmental viaducts were being erected on both sides of the Ko'olaus.

1.2.4 Archaeological Findings

Significant archaeological sites were found in North Halawa Valley and in the area that was used for the H-3 Kaneohe Interchange (see Section 2.3.4.1). The discovery of the sites at Kaneohe Interchange led to the signing of the project's MOA (see Section 1.2.1). This document specified data recovery and preservation of sites; preparation and implementation of an interpretive development plan; implementation of a plan to identify and treat historic properties that may be found in the inaccessible areas; archaeological monitoring of construction work; a Burial Treatment Plan in the event burials are discovered during construction; and the method of curating artifacts. Since the time the MOA was signed in 1987, HDOT has deferred to OHA to be the cultural expert with regard to the treatment of archaeological and cultural sites.

Although the Kaneohe Interchange sites affected the design of the interchange, they did not affect the H-3 alignment in Haiku Valley. However, in North Halawa Valley, H-3 was re-aligned to avoid damaging Sites 75 and 85 (see Section 2.3.4.1), threading through a narrow area between the sites. OHA has not yet decided on how the North Halawa Valley sites will be treated, although the sites will be preserved. In addition, HDOT has complied with OHA's recommendation to obtain fee simple ownership of North Halawa Valley from ridge to ridge. Funds to purchase the valley from Bishop Estate were put in escrow, which gave possession of the land to HDOT. The Certificate of Deposit and Possession was filed with the Circuit Court of the First Circuit on May 3, 1993.

1.3 PLANNING PROCESS

1.3.1 Environmental Assessment

The retention of the North Halawa Valley construction access road, which is located in the State conservation district, requires that the BLNR amend CDUP OA-7/27/81-1405 by

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removing Condition I.15. (see Section 1.2.2). This condition requires the removal of the road after Interstate Route H-3 is completed. As described in Section 1.1 and 1.5.1, HDOT also wants to retain the Haiku Valley access road, which is also located in the conservation district. The removal of the Haiku Valley road was not specifically mentioned in CDUP OA 7/27/81-1405. However, HDOT believes that it was the intention of the BLNR in 1983 that all construction access roads in the conservation district be removed upon completion of H-3.

As described in Chapter 3, consultation with staff from the Department of Land and Natural Resources, Land Management Division (DLNR-LM) and the Office of Environmental Quality Control (OEQC) was held to determine the appropriate mechanism for HDOT to petition the BLNR for the CDUP amendment. Based on recommendations from DLNR-LM and OEQC, HDOT decided that an environmental assessment (EA), prepared in accordance with HRS Chapter 343 and HAR Title 11, Chapter 200, would be the appropriate mechanism. The EA would:

- provide the public the opportunity to comment on HDOT's proposal; and
- provide the BLNR with information to make the appropriate CDUP amendment decisions.

1.3.2 Finding of No Significant Impact

HDOT distributed the Draft EA to the public libraries nearest to the project site and 18 federal, State and City and County of Honolulu agencies in October 1998. In accordance with HAR Chapter 200, the availability of the Draft EA was announced in the October 8, 1998 publication of the State Environmental Notice, which initiated the start of the 30-day public comment period that formally ended on November 9, 1998. Comment letters were received from various federal, State of Hawaii and City and County of Honolulu agencies, and one environmental organization (see Table 3-1). Copies of these letters can be found in Chapter 3, and each letter is immediately followed by a response letter. The comment letters were reviewed and used to prepare this Final EA.

Based on an analysis of the short- and long-term impacts of the proposed action (see Chapter 2) in comparison to significance criteria specified in HAR 11-200-12 (see Chapter 4), and comments received (see Chapter 3), the HDOT has declared a Finding of No Significant Impact (FONSI) for the proposed action. Further information on this FONSI determination can be found in Chapter 4.

1.3.3 Request to the Board of Land and Natural Resources

Following announcement of this Final EA / FONSI in the State Environmental Notice, HDOT will submit a formal request to the BLNR to remove Condition I.15. from CDUP OA-7/27/81-1405.

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1.4 PURPOSE AND NEED

The HDOT wants to retain the Interstate Route H-3's construction access roads in North Halawa Valley and Haiku Valley despite proposing to remove the roads in 1983 following completion of the freeway because the following circumstances have changed since the CDUP was granted:

- the freeway was shifted from its original alignment in North Halawa Valley to over the meandering North Halawa Stream, which required the use of more structures (e.g., stream channel linings, pier foundations, piers and viaducts) than originally planned;
- heightened concern about flooding conditions in North Halawa Valley and high annual rainfall in Haiku Valley; and
- archaeological sites in North Halawa Valley are now considered significant.

1.4.1 Inspection and Maintenance

In North Halawa Valley, Interstate Route H-3 originally was planned to be placed generally along one side of North Halawa Stream. However, the discovery of archaeological sites resulted in the HDOT re-aligning the freeway over the meandering stream (see Figure 1-2). This required the use of long span viaducts to minimize impacts to the stream. However, the placement of pier foundations near the banks of North Halawa Stream could not be avoided. Although the design of the freeway included deep drilled shaft foundations and rock lining of the stream banks, the pier foundations are still susceptible to damage during heavy stream flow, such as during a 50-year or 100-year storm. During such a storm, North Halawa Stream would probably be overtopped and the valley floor would be flooded (see Section 2.2.1).

One cause of bridge failure is the scouring of bridge foundations from floods or erosion. Therefore, much attention is devoted to developing and implementing procedures for designing and inspecting bridges for scour. Periodic scour inspections are part of HDOT's bridge maintenance program. The added cost of making a bridge less vulnerable to scour is small when compared to the total cost of a failure. Most importantly, public safety (motorists using the freeway) is compromised if bridges are damaged by scour.

On the windward side, the construction of drainage infrastructure, such as large storm drains and culvert outlet energy dissipators, were required because of windward's high annual rainfall. The dissipators are designed to control outlet velocity of storm water, while still allowing flow. If blocked by debris, flood damage may result to highway facilities and adjacent areas downstream.

Regular inspection of the freeway structures and storm water energy dissipators will be performed by HDOT personnel in accordance with 23 Code of Federal Regulations (CFR), Section 650 - Bridges, Structures and Hydraulics. The access roads will provide HDOT personnel with quick access to all sections of the freeway in North Halawa Valley and Haiku Valley. Invariably over time, maintenance or minor construction work to foundations, columns, stream linings or dissipators will be needed. Vehicles must have access to the sites that

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require maintenance or construction work. Depending on the work, these vehicles may include concrete trucks, dump trucks or excavators.

Vehicular access to the exploratory tunnel will assist regularly scheduled inspections, as well as unforeseen maintenance activities.

1.4.2 Archaeological Resources

At the time of the CDUA process in the early 1980s, the archaeological sites in North Halawa Valley were not considered significant. Since that time, the State Historic Preservation Officer has reconsidered, and some of the sites in the valley are now considered significant, notably Sites 75 and 85. OHA has not yet determined the appropriate treatment of the North Halawa Valley sites. However, OHA has indicated its desire to maintain access to the sites so that they can eventually be restored and protected. In accordance with an agreement between HDOT and OHA, access into the valley for traditional cultural practices has been and will continue to be allowed. Retention of the North Halawa Valley access road will facilitate OHA's efforts to restore the sites and cultural practices.

1.5 ALTERNATIVES

There are only two possible alternatives: (1) the proposed action, which would retain the H-3 construction access roads in North Halawa Valley and Haiku Valley and maintain current conditions; or (2) an alternative that would remove the access roads, and restore the affected areas, as best as possible, to their conditions before the H-3 construction.

1.5.1 Proposed Action

HDOT is proposing to retain the Interstate Route H-3's construction access roads in North Halawa Valley and Haiku Valley, including the existing locked gates so that it can continue to prevent unauthorized passage into the valleys. HDOT proposed and agreed to remove the North Halawa Valley access road when it obtained CDUP OA-7/27/81-1405 (see Section 1.2.2). However, because of the purpose and need described in Section 1.4, HDOT has decided to petition the BLNR to remove Condition I.15. from CDUP OA-7/27/81-1405 (see Section 1.2.2). Retention of the Haiku Valley access road is included in this proposal despite not being specifically mentioned for removal in CDUP OA-7/27/81-1405.

1.5.1.1 Existing Condition of Access Roads

The North Halawa Valley construction access road is approximately five miles in length starting from a quarry in the lower portion of the valley to the exploratory tunnel of the Tetsuo Harano Tunnels (see Figure 1-2). The road is asphalt-paved with steel deck bridges at stream crossings, and is typically 24 feet wide. Ground cover vegetation was planted and erosion control matting was installed along the sides of the access road. Silt fences to control erosion were also erected at certain locations along the road. The entrance to the road, located about one half-a-mile mauka (northeast) of Halawa Interchange, is secured with a locked gate that

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was installed to prevent unauthorized access. Another interim gate is located approximately one mile in from the first gate. As shown on Figure 1-2, only the lower portion of the North Halawa Valley access road near the quarry is not in the conservation district.

The Haiku Valley construction access road is approximately two miles in length measured from the Likelike Highway cul-de-sac to a point approximately 600 feet from the Tetsuo Harano Tunnels (see Figure 1-3). The road is asphalt-paved, and is typically 24 feet wide. The lower steel deck bridge is 24 feet wide, while the upper two bridges are 16 feet wide and topped with asphalt pavement. Passage to the access road is from the Hokulele Subdivision via a Board of Water Supply (BWS) maintenance road located approximately half way between the cul-de-sac and the other end of the road (see Figure 1-3). This BWS road is steep and narrow (one lane) and starts between two single-family residences in the Hokulele Subdivision. Passage to the access road is secured with a locked gate on the BWS road. HDOT has an easement to use the BWS road. As shown on Figure 1-3, portions of the Haiku Valley access road at the BWS road and Castle Hill Subdivision are not in the conservation district.

1.5.1.2 Capital Improvements of the Proposed Action

If allowed to retain the access roads, HDOT will evaluate the condition of the 24 temporary construction bridges along the roads. There are 21 bridges on the North Halawa Valley access road and three bridges on the Haiku Valley access road. It is anticipated that some of these bridges will need to be upgraded or replaced with a similar type of bridge in compliance with current safety standards. For example, two of the bridges on the Haiku Valley access road will be upgraded from wood deck to steel deck. No significant earthwork (grading or filling) activities will be associated with any bridge upgrade or replacement.

HDOT will also stabilize the slope and control erosion in the area of the North Halawa Valley access road near the location of the former guard shack (see Figure 1-2). Repeated efforts to encourage plant growth along the slope in this area have not been successful because of its steep and unstable grade. Although very little erosion occurs during most of the year, in rainy weather substantial amounts of sediment material can slough off onto the access road. To correct this problem, HDOT is considering raising approximately 1,400 linear feet of the access road to flatten the adjacent slope. This will require approximately 30,000 to 40,000 cubic yards (c.y.) of fill.

1.5.1.3 Proposed Uses of the Access Roads

Regular inspection (at least once every two years) of bridge foundations and piers and storm water dissipators will be performed by HDOT personnel in accordance with 23 CFR 650 - Bridges, Structures and Hydraulics. Special inspections will be performed after major storms. The inspection will normally require the use of a standard four-wheel drive type vehicle, but certain inspections may require the use of a "cherry picker" or flatbed type truck. When maintenance or minor construction work is required, heavier vehicles will be used, such as excavators, concrete trucks or dump trucks.

HDOT will allow personnel from certain agencies, such as OHA (see Section 1.4.2), the U.S. Geological Survey (USGS), the Department of Land and Natural Resources, Division of

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Forestry and Wildlife (DLNR-FW) and the Historic Preservation Division (SHPD), access into North Halawa Valley.

USGS is currently monitoring stream flow and water quality of North Halawa Stream at three stations. The most mauka (northeast) station monitors post-construction sediment loads and stream flow for HDOT, and will be operating until September 30, 1999. Another station located close to the second gate monitors the affects of highway runoff on stream water quality for HDOT, and will be operating until September 30, 2000. The third station located adjacent to the highway runoff station will be operating indefinitely as part of a cooperative hydrological data program with the Commission on Water Resource Management.

DLNR-FW may need access into the valley to conduct their programs, such as revegetation, species monitoring, pest control, and other resource management activities. SHPD would enter valley to examine or preserve the archaeological sites. HDOT will also allow use of the North Halawa access road in the event of an emergency, such as fire fighting or rescue operation in the valley.

The general public will be denied use of the North Halawa Valley access road. Existing fencing and gates would be maintained to prevent vehicular access by the general public. However, in accordance with an agreement between HDOT and OHA, access into the valleys has been and will continue to be allowed for traditional cultural practices. If other agencies or organizations wish to propose other uses of the access road, they would have to obtain permission from HDOT. Since any other use would not be covered under CDUP OA-7/27/81-1405, these agencies or organizations would have to petition the BLNR for a CDUP or an amendment to CDUP OA-7/27/81-1405. HDOT will not allow alternative uses of the North Halawa Valley access road unless approved by the BLNR. OHA has indicated in a letter dated October 21, 1998 (see Chapter 3) that it may request the BLNR for greater public access into the valley after it has completed studies on the cultural sites (see Sections 1.2.4 and 1.5.3).

The proposed action does not include general public use of the Haiku Valley access road.

1.5.2 Remove Roads Alternative

The Remove Roads alternative (RRA) involves the extraction of the construction access roads in North Halawa Valley and Haiku Valley, and to the extent possible, restoring the property to its natural state before the access roads were constructed. Construction activities include the clearing and grubbing of existing vegetation; removal of erosion control measures; demolition and removal of pavement; and substantial earthwork activities (e.g. slope excavation, grading and back filling). In North Halawa Valley, approximately 200,000 c.y. of fill material would have to be imported, 60,000 c.y. of existing slope would have to be excavated, 21 stream crossing structures would have to be removed, and an estimated 50 acres of graded area would have to be re-planted. In Haiku Valley, approximately 15,000 c.y. of fill material would have to be imported, 42,000 c.y. of existing slope would have to be excavated, 16,000 c.y. of reinforced slope would have to be constructed, three stream crossing structures would have to be removed, and an estimated 30 acres of graded area would have to be re-planted.

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Walking trails along the freeway at both valleys would be constructed for HDOT personnel to conduct their inspection work. The walking trail in North Halawa Valley can also be used by OHA, USGS, DLNR and SHPD personnel for their programs or activities (see above).

The estimated cost of construction work is \$10 million. If funds are available, the start of construction could be scheduled as early as June 1999 and is estimated to last approximately 12 months in North Halawa Valley and approximately 12 months in Haiku Valley.

If the BLNR denies HDOT's CDUP amendment request, the HDOT would seek funding and implement the RRA.

1.5.3 Possible Future Activities Not Part of Proposed Action

A spur road from the Haiku Valley access road to the Windward portal of the exploratory tunnel may be constructed because it would provide the flexibility of an alternative inspection and maintenance access to the exploratory tunnel from the Haiku Valley side. If the road is constructed, its profile would be similar to the existing Haiku Valley access road, and would only be used by HDOT personnel. HDOT has not decided whether to proceed with the spur road plan mainly because it currently has access to the exploratory tunnel from the North Halawa Valley side. The spur road project would have to obtain its own CDUP or an amendment to CDUP OA-7/27/81-1405. Retaining the Haiku Valley construction access road does not in any way necessitate the construction of the spur road because the purposes of both roads are different.

In accordance with the MOA, HDOT has committed \$11 million to enhance the archaeological and cultural sites discovered in North Halawa Valley and Kaneohe Interchange (see Section 2.3.4.1). OHA is in the process of determining appropriate protection, restoration, maintenance, and interpretive activities for the sites in cooperation with HDOT. Once this is completed, OHA has indicated in a letter dated October 21, 1998 (see Chapter 3) that it may request the BLNR for greater public access.

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Chapter 2 Environmental Setting, Impacts and Proposed Mitigation

This chapter describes the existing environmental conditions of the project area. It also describes the short-term construction impacts and long-term impacts of the proposed action and the Remove Roads alternative (RRA). In cases where a short- or long-term impact is considered adverse, proposed mitigation is provided.

2.1 CONSTRUCTION

As described in Section 1.5.1.2, the proposed action's construction activities will be limited to the upgrade or replacement of certain bridges, and work to correct a steep side slope in one area of the North Halawa Valley access road. Alternatively, construction under the RRA would be a major undertaking that would involve the removal of pavement and erosion control measures and substantial grading and earthwork activities (see Section 1.5.2).

In summary, construction of the RRA would once again disturb the environmental conditions of North Halawa Valley and Haiku Valley because of this alternative's size and scale of effort (see Section 1.5.2). In comparison, work to correct erosion problems along a 1,400-foot section of the North Halawa Valley access road under the proposed action (see Section 1.5.1.2) will have minimal effects. Under both alternatives, construction-related mitigation measures will be implemented.

2.1.1 Air Quality and Noise

The construction activities described in Sections 1.5.1.2 and 1.5.2 will cause fugitive dust and mobile source emissions. Fugitive dust will be generated by construction vehicles operating around the construction sites and material blown from uncovered haul trucks, stockpiles, and exposed areas. Mobile source emissions will be generated by construction vehicles emitting engine exhaust while in operation. Construction will also involve the use of noisy machinery, such as graders and scrapers, which cause noise levels at 50 feet away to be as high as L_{max} 92 dBA (Federal Highway Administration, 1976).

Since there are no sensitive receptors (e.g., residences) in North Halawa Valley, fugitive dust, mobile source emissions and noise from the construction site will cause no harm. However, in Haiku Valley, Hokulele and Castle Hills residential subdivisions and the Kaneohe State Hospital are adjacent to the access road (see Figure 1-3), and therefore, would experience fugitive dust and noise disruptions under the RRA. These receptors will not be affected under the proposed action because the upgrading of two bridges on the Haiku Valley access road (see Section 1.5.1.2) will not generate fugitive dust or cause substantial, prolonged noise effects.

To control fugitive dust at areas near sensitive receptors, the HDOT would require the contractor under the RRA to:

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- minimize land disturbance;
- use dust suppressants (e.g., watering trucks) in areas that are not paved;
- cover trucks when hauling dirt or dust-producing materials;
- stabilize the surface of dirt piles if not removed immediately;
- use windbreaks in appropriate areas;
- limit vehicular paths and stabilize temporary roads;
- restore to original conditions any disturbed land not used to the extent possible;
- remove unused material and dirt piles; and
- restore to original condition all vehicular paths created during construction to the extent possible.

The State of Hawai'i Department of Health (DOH) maintains community noise control standards that apply to construction noise. Therefore, the RRA would not exceed the stipulated noise limits unless a permit is sought and granted by DOH.

2.1.2 Water Resources

The clearing, filling and earth moving activities of the proposed action and RRA that are described in Sections 1.5.1.2 and 1.5.2, respectively, would expose un-vegetated soil to the elements (wind and rain) and may alter existing drainage patterns. The RRA may expose approximately 80 acres in both valleys. The proposed action will expose approximately five acres. If erosion and sedimentation are the result of construction activities, water resource impacts may occur. In North Halawa Valley, sediment-laden stormwater runoff would flow into North Halawa Stream, and eventually into lower elevation water bodies, such as Halawa Stream and Pearl Harbor. In Haiku Valley, sediment-laden stormwater runoff would flow through existing urban areas and streams (He'eia and Luluku) in the valley.

Stormwater runoff and erosion during project construction, regardless of the alternative, would be mitigated through the use of Best Management Practices (BMPs) established before construction begins. Generally accepted BMPs that were used during construction of H-3, and which may be appropriate for the RRA include:

- silt curtains or fences;
- minimizing areas of disturbance;
- immediate planting of vegetation and/or mulching in areas prone to erosion; and
- erosion control matting.

The specific erosion control measures that would be implemented under either alternative would be approved by DOH when they issue a National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit for the RRA (see Section 2.5).

2.1.3 Historic And Archaeological Resources

Construction of the RRA in North Halawa Valley has the potential to damage or destroy archaeological and historic sites adjacent to the access road. These sites are described in Section 2.3.4.1. As described in this same section, there are no known historic or cultural sites

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adjacent to the Haiku Valley access road. Construction activities under the proposed action will not affect the archaeological and historic sites.

Fenced buffer zones are already in place around North Halawa Valley Sites 75, 85, 86, 106, 108 and other sites that the State Historic Preservation Officer (SHPO) and the Office of Hawaiian Affairs (OHA) determined to be important (see Section 2.3.4.1). These buffer zones would be maintained during construction. If additional historic or archaeological sites are uncovered during construction, work would stop immediately, and the State of Hawai'i Department of Land and Natural Resources - Historic Preservation Division (SHPD) and OHA would immediately be notified. Construction would resume upon approval of the appropriate authorities.

2.1.4 Flora and Fauna

Construction of the RRA would displace existing fauna along the North Halawa Valley and Haiku Valley access roads. However, this impact would be minor because the species along the roads are introduced, or are found in many places on the island. The native plant species in North Halawa Valley (see Section 2.2.3.1) would not be affected by construction activities because they are mostly located in the upper valley along the valley walls. The construction activities under the proposed action will displace small amounts of fauna because most activities will occur on existing pavement.

The habitats of the avifaunal and terrestrial faunal species in the valleys would be disturbed or displaced by construction activities similar to how they were disturbed or displaced during construction of H-3. Since the duration and scale of the RRA's construction activities are shorter and smaller than the activities of H-3, the impacts would not be as severe. The proposed action's construction duration and scale will be even shorter and smaller.

2.1.5 Traffic

The RRA would require that construction vehicles (excavators, dump trucks, etc.) have passage to both the North Halawa Valley and Haiku Valley access roads.

Construction access to North Halawa Valley for both alternatives will not be a problem because of the road's location near the Halawa quarry (see Figure 1-2). Since the lower portion of North Halawa Valley is industrialized, the effects of construction vehicle traffic (e.g., dust and noise) will be minimal because there are no sensitive receptors, such as residences.

In Haiku Valley, passage to the access road is through a steep, single-lane Board of Water Supply (BWS) maintenance road located at the mauka side of the Hokulele residential subdivision (see Section 1.5.1.1). This BWS road is adequate for the types of vehicles that will be used for the upgrading of the bridges (see Section 1.5.1.2), and inspections and repair activities. However, since the RRA would be a major construction activity requiring heavier construction vehicles, access through the existing BWS road would not be an option. Even if the BWS road was improved to handle heavy construction vehicles, passage would be through the Hokulele subdivision. The adverse effects to the residential subdivision associated with

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this traffic, such as noise, dust and safety, would likely influence the community to object strongly.

A more likely route for construction vehicles would be through a new temporary construction road (dirt road) connecting the access road cul-de-sac and Likelike Highway (see Figure 2-1). This possible access location was the access point used during the construction of H-3 in Haiku Valley and Kaneohe. Placing a temporary road in this area would probably require the closure of one of the two lanes on the Likelike Highway to H-3 on-ramp. This temporary road would avoid the archaeological site located inside of this on-ramp (see Section 2.3.4.1).

2.2 PHYSICAL ENVIRONMENT

From 1987 to 1997, the physical environment of North Halawa Valley and Haiku Valley was disturbed by the construction of H-3. However, in the short time since construction was completed, the valleys are recovering naturally and with the help of H-3 environmental mitigation measures, such as re-planting, BMPs and terraced walls constructed on side slopes. HDOT is continuing to explore measures to restore the valleys to their natural conditions before being disturbed by H-3 construction. For example, HDOT will stabilize the slope and control erosion in the area of North Halawa Valley near the guard shack (see Section 1.5.1.2).

2.2.1 Water Resources

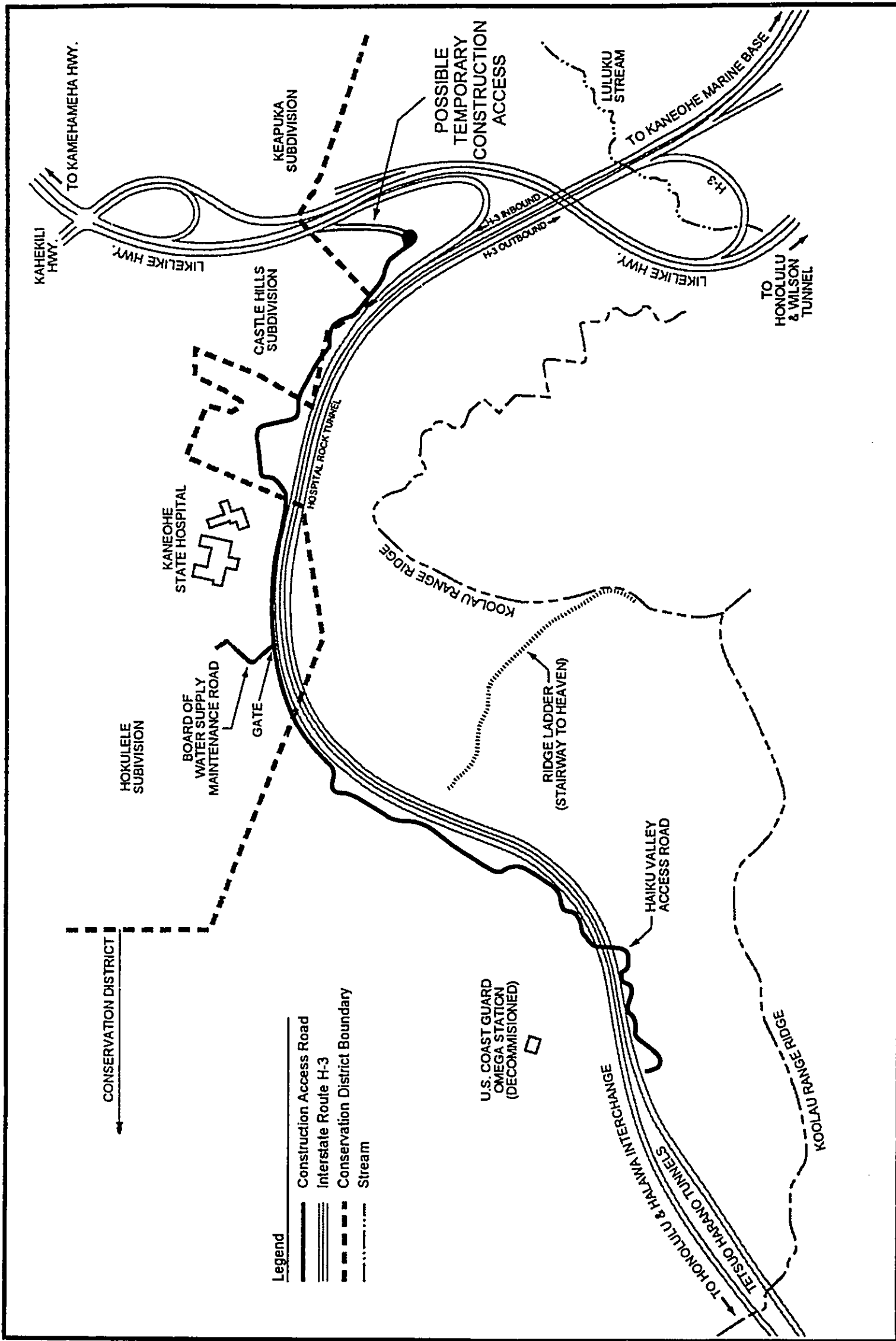
2.2.1.1 Existing Condition

Weather patterns and hydrology in North Halawa Valley and Haiku Valley are influenced by the prevalent northeast tradewinds and the Ko'olau Range. The Ko'olaus induce rainfall, particularly at the summit and the windward (Haiku Valley) side. The lower leeward (North Halawa Valley) areas receive substantially less annual rainfall than the summit and windward areas.

Surface water flow in North Halawa Valley and Haiku Valley is torrential and generally short lived, except where fed with confined water flows due to the high permeability of the basaltic rock. North Halawa Stream spans the entire length of the valley, and connects with South Halawa Stream at Halawa Interchange forming Halawa Stream to Pearl Harbor. In the valley, the stream zigzags across H-3 and the construction access road several times (see Figure 1-2). The windward streams near the Haiku Valley access road include He'eia Stream and Luluku Stream (see Figure 1-3). According to the Federal Emergency Management Agency's Flood Insurance Rate Map, the access roads are located in Zone D, indicating that flood hazards have not been determined.

There are two principal sources of groundwater in the project area: high-level water within the Ko'olaus and groundwater underneath North Halawa Valley. The high-level water is a series of impermeable dikes of hardened lava within the Ko'olaus that generally retard and control groundwater movement. Rain infiltration and percolation recharge the dikes almost entirely. A basal groundwater aquifer is located below North Halawa Valley, and is part of the Southern

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Possible Construction Access under the RRA
RETENTION OF CONSTRUCTION ACCESS ROADS
NORTH HALAWA VALLEY AND HAIKU VALLEY
Final Environmental Assessment
FIGURE 2-1



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O'ahu Basal Aquifer (SOBA), a U.S. Environmental Protection Agency designated sole source aquifer. The SOBA occurs as a basal freshwater lens floating on salt water, and encompasses almost all of southern O'ahu from the Ko'olaus and central O'ahu to the coast line in Honolulu and Ewa. The basal groundwater in the valley is fed by direct percolation of precipitation from North Halawa Stream and the dike complex in the Ko'olaus.

H-3 includes infrastructure designed to minimize or prevent contamination of groundwater and other water resources. Roadway runoff in the tunnels and on the North Halawa Valley viaduct is collected in storm drains and conveyed through piping to points well beyond the conservation protective subzone district. Also, vegetation and erosion control matting were placed in areas that were cleared of vegetation during construction, including areas adjacent to the North Halawa Valley access road.

2.2.1.2 Potential Impact and Mitigation

The proposed action will have minimal or no effects on the quality of water resources in the valleys because of restricted vehicular access on the access roads (see Section 1.5.1.3). Therefore, contaminated stormwater runoff would be minimal. The RRA would also have minimal or no effect on the quality of water resources after construction is completed and vegetation is restored.

Although North Halawa Stream is dry many times during the year, during a severe storm (e.g., 50- or 100-year) the stream and most of the access road and bridges will be overtopped and the valley floor will be flooded. Since North Halawa Valley is undeveloped, the probability of adverse effects on life and property during a severe storm is remote.

To mitigate potential water resource impacts, the existing BMPs (e.g., matting and silt fences) along the North Halawa access road will remain and be monitored during inspections.

2.2.2 Topography, Geology and Soils

2.2.2.1 Existing Condition

North Halawa Valley is typical of the deep, narrow, elongated valleys along the southwest side of the Ko'olaus that were formed by stream erosion. The lower portion of the valley is relatively flat overlaying ancient marine sediments that were deposited at a time when the oceans were higher. At the middle and upper portions of the valley, the floor is narrow and the walls are steep. In a few places, the floor is only about 100 to 200 feet wide, measured at the 20 percent slope line. From the lower portion of the valley to the back, the floor rises gradually at about a five percent grade. The soils in the lower portion consist of well drained clay loams with a slight erosion hazard. Further up the valley, the soil becomes a poorly drained stoney clay with moderate to severe erosion potential. The side slopes of the valley are composed of basaltic rocks and thin layers of basaltic origin soils.

Haiku Valley, along with other valleys along the Ko'olaus northeast side, is the remnant of a volcanic caldera. These amphitheater-headed valleys, which are characterized by near vertical semi-circular valley heads with narrow sharp ridges, were formed by erosion, which

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were caused by high annual precipitation and the prevalent northeast tradewinds. Haiku Valley is horseshoe shaped with high walls extending over three sides. The elevation of the valley floor is approximately 400 feet, and the maximum elevation along the summit is approximately 2,400 feet. The valley walls consist entirely of rock outcroppings. The soils of the slopes and valley floor are well drained silty clays of alluvial and colluvial origins.

The topography of North Halawa Valley was altered by H-3. In particular, construction of the access road cut through the topography of the valley floor, and the alignment of the freeway required the cutting of several outcroppings along the valley walls. To prevent erosion and encourage plant growth, terraced walls were constructed in some areas where the outcroppings were cut. The topography of Haiku Valley was left mostly intact, largely because of the use of viaducts for the freeway. H-3's visual and aesthetic impacts are briefly described in Section 2.3.5.1.

2.2.2.2 Potential Impact

The proposed action will not cause major changes to the existing topography of North Halawa Valley. The proposed action includes flattening a slope and re-vegetation at the roadway section near the former guard shack. The RRA would restore, as best as possible, the topography of the valleys to its pre-H-3 condition, except areas that cannot be restored due to the location of the freeway.

2.2.3 Flora and Fauna

2.2.3.1 Existing Condition

The vegetation in the lower portion of North Halawa Valley comprises mostly of weedy herbs and shrubs. The vegetation in the interior (along the stream and floor) of North Halawa Valley is variable and diverse, containing a number of cultivated species that are remnant of the valley's past use, such as mango, taro, hau, banana, kukui, ti and ohia-o. The upper portion of the valley near the tunnels was the least disturbed area prior to the construction of H-3. This area supported a native forest of ohia, koa and sandalwood trees mostly along the side walls. However, a large number of introduced species were also present before the H-3 construction, especially on the valley floor.

Following construction of H-3, vegetation similar to the pre-H-3 condition has spread throughout areas of North Halawa Valley disturbed by construction, including the areas beneath the viaduct. However, in some areas beneath the freeway where the height of the viaduct is relatively low, vegetation has not propagated probably because of inadequate sunlight. In these areas, the HDOT has placed erosion control matting and silt fences. The vegetation along the walls of the valley survived H-3 construction, except the outcroppings that had to be cut (see Section 2.2.2.1). In these areas, the HDOT constructed terraced walls and other erosion control measures to stabilize the slopes and facilitate plant growth.

The vegetation along the Haiku Valley access road consists of both native and introduced species, and none are considered threatened or endangered. Following completion of H-3,

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vegetation has spread throughout the areas disturbed by construction, including areas beneath the freeway.

During the planning of H-3, four separate field surveys (one of these surveys was for the original alignment through Moanalua Valley) for avifauna were conducted. None of the avifaunal species observed during these surveys were considered threatened or endangered by the U.S. Fish and Wildlife Service (FWS). At the time, there was concern about potential impacts to the O'ahu Creeper, and an endangered species, and three other native species, apapane, amakihi, and 'elepaio. The 'elepaio has since been categorized as a Candidate species by the FWS (telephone conversation with FWS on September 14, 1998). Construction of H-3 may have disturbed the native and non-native avifauna species in North Halawa Valley and Haiku Valley.

North Halawa Stream lacks aquatic resources because it is intermittent (see Section 2.2.1.1). Terrestrial fauna in both North Halawa Valley and Haiku Valley consist of feral pigs, stray cats, mongoose, mice and rats. The feral pig population in North Halawa Valley was probably disturbed by construction of H-3. However, now that H-3 is open to traffic and the public is still denied access into the valley, it is likely that wild pigs have propagated in the valley.

2.2.3.2 Potential Impact

The proposed action will not alter or affect the flora restoration of North Halawa Valley and Haiku Valley from the conditions during the H-3 construction. Retaining the access roads will not exacerbate alien plant species invasion of the upper section of North Halawa Valley because very few people will use the roads (see Section 1.5.1.3). The RRA would also not alter or affect the flora restoration of the valleys once construction and re-planting are completed. Since HDOT would still have to inspect the freeway by hiking in, the RRA may pose a slight threat to native plant species in the upper valley because inspectors would probably unintentionally carry (such as on their boots) alien seeds from the lower section of the valley.

2.2.4 Air Quality And Noise

The existing air quality and noise conditions of both North Halawa Valley and Haiku Valley are mostly influenced by the operation of H-3. Both the proposed action and the RRA, once it is completed, will not affect the operation of H-3, and therefore will not affect existing air quality and noise conditions in the valleys.

2.3 SOCIAL ENVIRONMENT

2.3.1 Land Use

Although, long term land use development impacts was one of the controversial issues surrounding H-3, this issue is not applicable to the proposed action or the RRA. Neither alternative will influence the operation of H-3 nor governmental or private land use decisions,

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which are some of the factors that influence long-term land use development. A brief description of the existing land uses near the access roads is provided below.

Except for H-3, the section of North Halawa Valley from the conservation district boundary (see Figure 1-2) to the back of the valley is undeveloped. The area southwest of the conservation district boundary has a State Urban designation, and is mostly used for industrial purposes, such as a quarry located at the entrance to the access road and Halawa industrial Park. Other land uses in the lower portion of the valley include an animal quarantine station and the Halawa High Security and Medium Security Facilities. Residential land uses nearest to H-3 are located along the ridges to the west (Halawa Heights) and east (Red Hill) of the freeway, and to the south of Halawa Interchange (Foster Village).

In Haiku Valley, existing land uses near H-3 include single-family and low-density multi-family residences (Hokulele Subdivision, Castle Hills Subdivision, Haiku Village), Windward Community College and Kaneohe State Hospital (see Figure 1-3). These land uses are located in the lower portion of the valley between H-3 and Kahekili Highway. The upper portion of the valley is vacant largely because it is in the conservation district. Recently, the U.S. Coast Guard OMEGA navigational station occupied a portion of the upper valley. The station is no longer in operation.

2.3.2 Social And Economic Activities

The proposed action or the RRA will have no influence on the factors that affect social or economic conditions. Since there are no impacts, a discussion under this section is not needed.

2.3.3 Recreational Activities

2.3.3.1 Existing Condition

Prior to the construction of H-3 in North Halawa Valley, the valley was used for hiking and pig hunting. However, because the valley trails were difficult to access and were on private property, a limited number of people used the valley for recreation purposes. In comparison, a far greater number of hikers use the nearby Aiea Loop Trail on the ridge to the west of North Halawa Valley. Since the construction of H-3, public access for hiking and pig hunting in the valley has been prohibited for safety reasons. Fencing along the valley floor prevent both vehicular, pedestrian and bicycle access.

Prior to the construction of H-3 in Haiku Valley, a steep stairway (often referred as "Stairway to Heaven") constructed on the valley wall was used by hikers to access the summit of the Ko'olaus (see Figure 1-3). The stairway was constructed as part of the OMEGA station to allow access to antennas on the summit. The stairway was closed in the 1980s for safety reasons, before the construction of H-3 in Haiku Valley.

2.3.3.2 Potential Impact

Under both the proposed action and RRA, HDOT will continue to prohibit general public access, including hiking, into North Halawa Valley. However, HDOT will allow access for traditional cultural practices in accordance with its agreement with OHA. HDOT and OHA is concerned that some hikers may intentionally or unintentionally damage the archaeological, cultural and historic sites in the valley (see Section 2.3.4.1). As described in Section 1.5.3, OHA is in the process of determining appropriate protection, restoration, maintenance and interpretive activities for the North Halawa Valley archaeological / cultural sites (see Section 2.3.4). In a letter dated October 21, 1998 (see Chapter 3), OHA indicated that it may seek greater public access into the valley after it has completed this study.

There has been public discussion initiated by the City and County of Honolulu on re-opening the old OMEGA station stairway and developing a Haiku Valley Cultural Nature Park (see November 2, 1998 letter from the City and County of Honolulu Planning Department in Chapter 3). Since the Haiku Valley access road is adjacent to the stairway and the OMEGA station, the road could be used as a part of these recreational and park facilities. However, these uses may not be covered under H-3's conservation district use permit (CDUP). If not covered, the City and County will have to request the Board of Land and Natural Resources to approve these uses.

2.3.4 Archaeology And Historic Resources

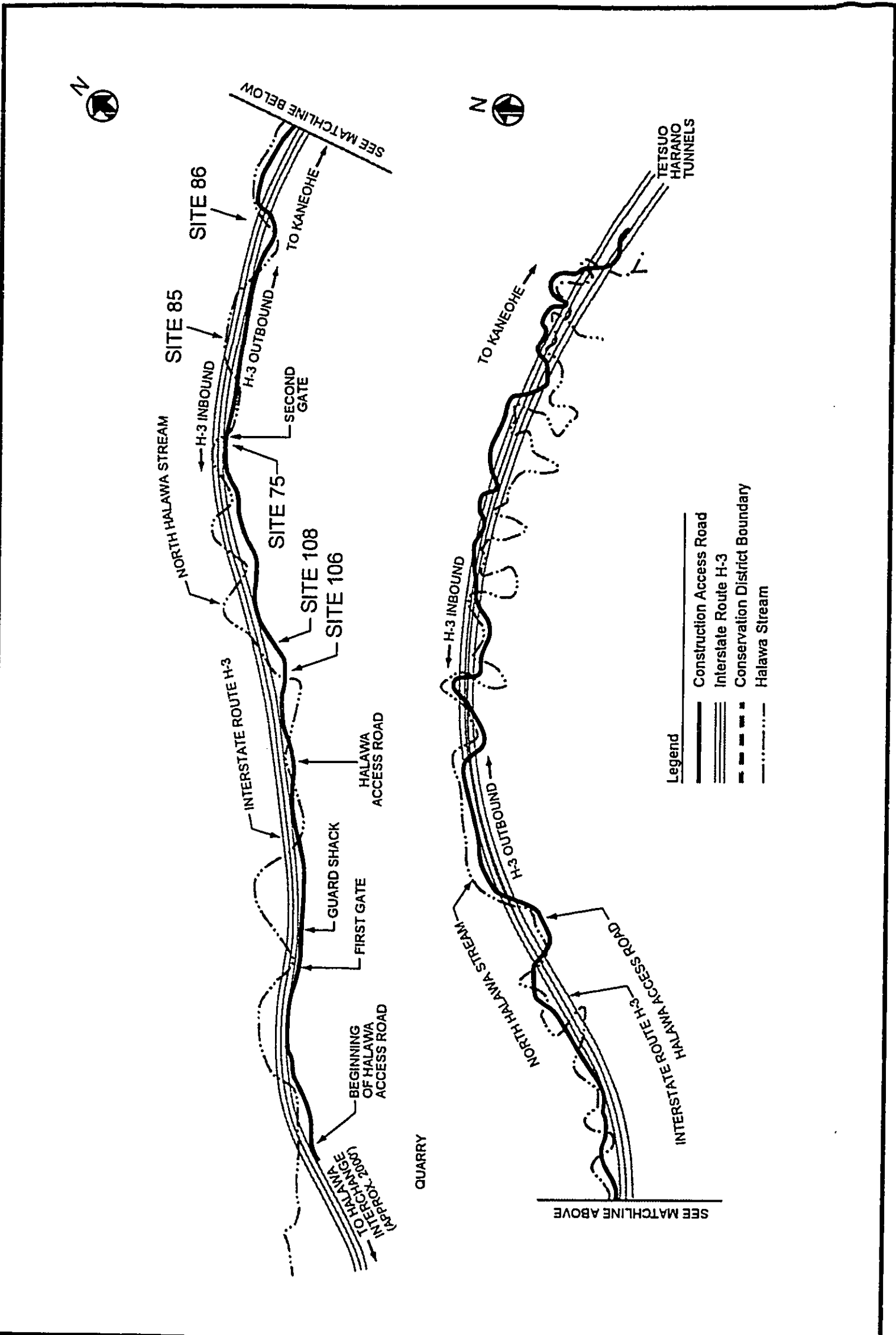
2.3.4.1 Existing Condition

The archaeological or cultural resources in North Halawa Valley are considered to be excellent examples of agricultural and habitation sites. They are likely related complexes that functioned as living and planting areas for native Hawaiians from the pre-contact period to the early 20th century. The two most notable sites are B1-75 (hereinafter referred to as Site 75) and B1-85 (hereinafter referred to as Site 85) (see Figure 2-2). Site 75 is a permanent habitation site that includes associated agricultural terraces, a petroglyph boulder, a possible small family heiau, and a historic period oven. Site 85 is an excellent example of an upper valley slope agricultural and habitation site. It appears to contain the remains of two to four small religious features, three to four permanent dwelling houses, a large number of agricultural features, and some small open air and covered work areas. The SHPO considered both sites to be significant and recommended their preservation, which affected the alignment of H-3 (see Section 1.2.4).

There are several other resources in the North Halawa Valley complex, which also functioned as agricultural and habitation sites. The notable sites that were not affected by H-3 because of the re-alignment (see Section 1.2.4) are Sites 86, 106 and 108 (see Figure 2-2). Other sites were designated for data recovery or were salvaged prior to the construction of H-3.

On the windward side, an archaeological site was discovered in 1984 in the area that will be used for the H-3 Kaneohe Interchange (see Figure 2-3). Called the Luluku Discontiguous Archaeological District, this site for the last few decades was used for successive cultivation of rice, pineapple, watercress, taro and bananas. To minimize impacts on the district, Kaneohe

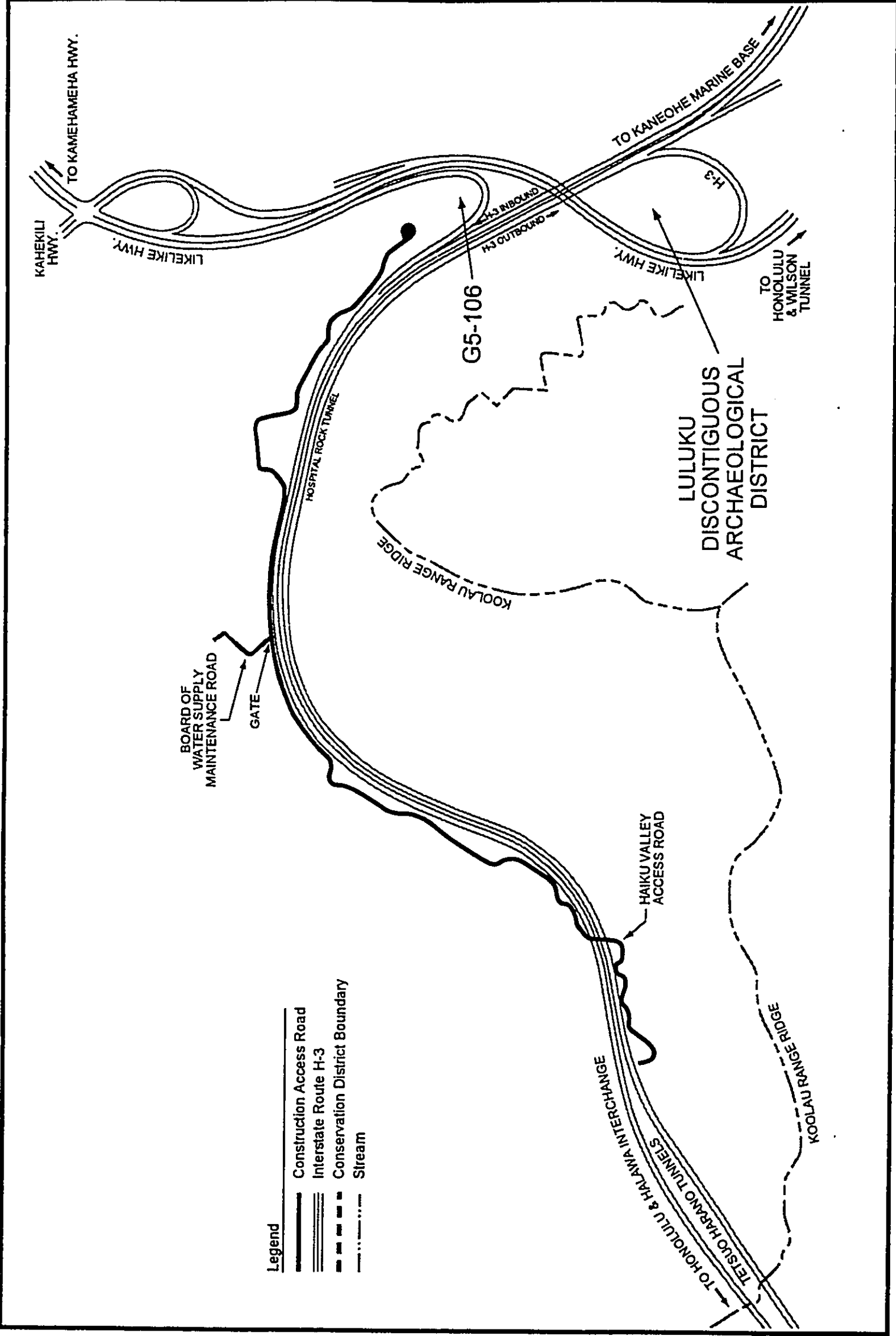
0000 00 14 1593



Archaeological Sites in North Halawa Valley
 RETENTION OF CONSTRUCTION ACCESS ROADS:
 NORTH HALAWA VALLEY AND HAIKU VALLEY
 Final Environmental Assessment
 FIGURE 2-2

GRAPHIC SCALE:
 1000' 0' 1000' 2000'

0000 00 14 1594



- Legend**
- Construction Access Road
 - == Interstate Route H-3
 - - - Conservation District Boundary
 - · · · · Stream



Archaeological Sites Near Kaneohe Interchange
 RETENTION OF CONSTRUCTION ACCESS ROADS
 NORTH HALAWA VALLEY AND HAIKU VALLEY
 Final Environmental Assessment
 FIGURE 2-3

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off-ramp loop was enlarged to avoid important sites of the district. Another archaeological site (G5-106) is adjacent to the mauka-bound Likelike Highway to H-3 on-ramp (see Figure 2-3). The site is preserved and fenced. The HDOT redesigned the on-ramp to avoid the site.

2.3.4.2 Potential Impact

Once completed, the RRA would not affect the cultural sites in North Halawa Valley. Potential impacts during construction are described in Section 2.1.3. Under the proposed action, access to the cultural sites in North Halawa Valley will be maintained. In accordance with the agreement between HDOT and OHA, OHA personnel, its agents, and SHPD staff will be allowed access into the valley for cultural or preservation purposes. Furthermore, access for traditional cultural practices will be allowed. Under the RRA, OHA and SHPD personnel seeking to visit the sites, as well as others seeking access for traditional cultural practices, would have to hike into the valley.

OHA has indicated in a letter dated October 21, 1998 (see Chapter 3) that it may seek greater public access to the sites once they have been protected and interpreted. As stated in Section 2.3.3.2, greater public access could cause intentional or unintentional damages to the sites. Therefore, the plans to protect and interpret the sites (see Section 1.5.3) will include appropriate measures to prevent damage.

Under the proposed action or the RRA, archaeological sites at Kaneohe Interchange will be unaffected, even during construction of the RRA (see Section 2.1.3).

2.3.5 Visual and Aesthetic Resources

2.3.5.1 Existing Condition

The visual and aesthetic conditions of North Halawa Valley and Haiku Valley were substantially altered by H-3. With its high bridges, the freeway is highly visible from several vantage points at both valleys. At the back of both valleys, the slopes were altered by the large portal structures of the twin tunnels.

2.3.5.2 Potential Impact

Largely because H-3 dominates the visual and aesthetic landscape and because of thick vegetation in both valleys, the existing construction access roads are in most cases not visible from most viewpoints. For example, the Haiku Valley access road cannot be seen from the Hokulele Subdivision, the nearest residential community.

2.4 PUBLIC SERVICES

2.4.1 Highway Maintenance

As described in Section 1.4, the purpose of the proposed action is to facilitate HDOT inspection and maintenance of H-3 in North Halawa Valley and Haiku Valley. As described in

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Section 1.4, periodic inspection is necessary because most of the freeway is constructed on viaducts or bridges, which are vulnerable to scour damage. The risk is magnified because North Halawa Valley is vulnerable to severe flooding and Haiku Valley experiences high annual rainfall and associated erosion (see Section 2.2.1). The access roads will be used by HDOT personnel for periodic, and as needed, inspection and maintenance of the freeway so that public safety is not compromised.

As described in Section 1.5.1.3, the inspection will normally require the use of a standard four-wheel drive type vehicle, or a "cherry picker" or flatbed type truck. When maintenance or minor construction work is needed, heavier vehicles, possibly construction vehicles such as excavators or concrete or dump trucks, will be used. The existing access roads, including the BWS maintenance road in Haiku Valley (see Section 1.5.1.1), will be able to accommodate the types of vehicles needed for inspection and maintenance work. The BWS road will not be able to accommodate large scale construction activities (see Section 2.1.5).

The access roads will be inspected periodically and maintained as needed. The erosion control matting and silt fences will also be inspected and maintained.

The RRA would not prevent HDOT personnel from conducting inspections. HDOT personnel would use walking trails that would be left in place of the access roads (see Section 1.5.2). Because inspections would be conducted "on foot," it would take the HDOT personnel longer to complete their work. When maintenance or minor construction work is needed to repair damage, such as scour to foundations or piers, HDOT would clear a road for construction vehicles. When this occurs, construction of the road(s) would disturb the environmental conditions (e.g., flora, fauna, water resources) of the valley(s) in a way similar to what is described in Section 2.1.

2.4.2 Fire and Emergency Services

The proposed action will facilitate fire and emergency services especially in North Halawa Valley where its narrow elongated geography make it difficult to access the interior valley floor if no road was present (H-3 is on a viaduct). The Haiku Valley access road could also be used for fire or emergency services.

2.5 PERMITS AND APPROVALS

The RRA, because of its construction activities, would require the following permits and approvals:

State

- State Department of Health - National Pollutant Discharge Elimination System Permit (NPDES) (storm water from construction site)
- State Department of Health - Noise permit (if noise levels are expected to exceed allowable levels as stated in HAR 11-46-6(a))

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Other than the CDUP amendment, the proposed action will require an NPDES permit (storm water from construction site).

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Chapter 3 Comments and Coordination

This chapter summarizes scoping activities conducted by the State of Hawai'i, Department of Transportation (HDOT) that occurred before the preparation of this Draft Environmental Assessment (EA); and the written comments that were received on the Draft EA that was announced and distributed in October 1998. In addition, other sections of the EA were revised as appropriate in response to comments received.

3.1 CONSULTATION AND SCOPING ACTIVITIES

Following the HDOT decision to petition the Board of Land and Natural Resources (BLNR) to amend the Interstate Route H-3's Conservation District Use Permit (CDUP OA-7/27/81-1405) that would allow the retention of construction access roads in North Halawa Valley and Haiku Valley, consultation was conducted with staff from the State of Hawai'i Department of Land and Natural Resources - Land Management Division (DLNR-LM), the State of Hawai'i Office of Environmental Quality Control (OEQC), and the State of Hawai'i Department of Health (DOH) to determine the appropriate mechanism to petition this request. The following consultation activities were conducted:

- Meeting at the DLNR Conference Room on August 6, 1998
Participants: DLNR-LM, HDOT, Federal Highway Administration (FHWA), and Parsons Brinckerhoff - Hirota Associates (PBHA)
- Meeting at the Office of OEQC on August 7, 1998
Participants: OEQC, HDOT, and PBHA
- Site Visit on August 17, 1998
Participants: DLNR-LM, OEQC, DOH, HDOT, and PBHA

A summary of these consultation and scoping activities is provide below.

3.1.1 DLNR-LM Consultation Meeting

The purpose of the meeting with DLNR-LM was to determine the mechanism for amending CDUP OA-7/27/81-1403. DLNR-LM was briefed on why HDOT is proposing to retain the roads, and how the roads can be used by other public agencies for their programs. DLNR-LM was also informed that if the access roads are removed, the restoration process would be a major undertaking and would cause adverse effects in the valleys.

DLNR-LM stated that BLNR action is required to amend CDUP OA-7/27/81-1405. DLNR-LM recommended that the CDUP amendment request include an EA to allow public comments on the HDOT proposal, and suggested consultation with OEQC for concurrence on this approach.

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3.1.2 OEQC Consultation Meeting

The purpose of the meeting with OEQC was to request concurrence that preparation of an EA would be the appropriate mechanism for petitioning the BLNR to amend CDUP OA-7/27/81-1405. OEQC was briefed on why HDOT is proposing to retain the roads, and how the roads can be used by other public agencies for their programs. It was pointed out that removing the access roads and restoring the valleys to their pre-H-3 conditions would be a major undertaking and would cause adverse effects in the valleys.

OEQC concurred that preparation of an EA would be the appropriate mechanism to amend the CDUP. It was recommended that the EA disclose "foreseeable" impacts (e.g. possible cultural access), secondary and cumulative impacts (e.g. possible introduction of alien plant species), and measures to mitigate adverse impacts.

3.1.3 Site Visit On August 17, 1998

The purpose of the site visit was to show DLNR-LM, OEQC and DOH the North Halawa Valley and Haiku Valley construction access roads, and to brief these agencies on how these roads are proposed to be used in the future: periodic inspection and maintenance of the H-3 tunnels and the viaduct structures. Areas where piers and foundations are vulnerable to scour, and the North Halawa Valley cultural sites were identified. In addition to bridge inspections, it was pointed out that the Haiku Valley access road will be used to facilitate maintenance and inspection of storm water dissipaters along the freeway. HDOT informed the group that it is considering construction of a spur road from the existing Haiku Valley access road to the exploratory tunnel. As described in Section 1.5.1.1, the existing access road does not reach the tunnels.

DLNR-LM indicated that the spur road, if included with the proposal to amend the CDUP, would probably initiate its own Conservation District Use Application (CDUA) process. DLNR-LM also pointed out that if OHA proposes any substantial development to support the North Halawa Valley cultural sites, this would also probably initiate its own CDUA process. OEQC stated that the EA, as a full disclosure document, should identify all potential future actions that are related to the proposed action, even if these actions serve different functions (e.g., any OHA development, spur road, etc.).

3.2 DRAFT ENVIRONMENTAL ASSESSMENT

3.2.1 Availability

In accordance with State law, availability of the project's Draft EA was announced in the State Environmental Notice on October 8, 1998, initiating a 30-day public comment period that formally concluded on November 9, 1998. Copies of the Draft EA were sent to the Hawaii State Library, the Aiea Public Library and the Kaneohe Public Library, as well as to the federal, State of Hawaii and City and County of Honolulu agencies listed on Table 3-1.

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**Table 3-1
Summary of Draft Environmental Assessment Consultation and Comments**

Agency	Provided Copy of Draft EA	Received Comments on Draft EA
Federal Agencies		
Department of Defense, Army Corps of Engineers	<input type="checkbox"/>	<input type="checkbox"/>
Department of the Interior, Fish and Wildlife Service	<input type="checkbox"/>	
Department of the Interior, U.S. Geological Survey	<input type="checkbox"/>	<input type="checkbox"/>
Department of Transportation, Federal Highway Administration	<input type="checkbox"/>	<input type="checkbox"/>
Environmental Protection Agency	<input type="checkbox"/>	
State of Hawaii Agencies		
Department of Business, Economic Development & Tourism, Office of Planning	<input type="checkbox"/>	<input type="checkbox"/>
Department of Hawaiian Home Lands	<input type="checkbox"/>	<input type="checkbox"/>
Department of Health	<input type="checkbox"/>	
Department of Land and Natural Resources (DLNR), Division of Forestry and Wildlife	<input type="checkbox"/>	<input type="checkbox"/>
DLNR, Division of Water Resource Management	<input type="checkbox"/>	<input type="checkbox"/>
DLNR, Land Management Division	<input type="checkbox"/>	<input type="checkbox"/>
DLNR, State Historic Preservation Division	<input type="checkbox"/>	
DLNR, State Parks Division	<input type="checkbox"/>	<input type="checkbox"/>
Office of Environmental Quality Control	<input type="checkbox"/>	<input type="checkbox"/>
Office of Hawaiian Affairs	<input type="checkbox"/>	<input type="checkbox"/>
City and County of Honolulu Agencies		
Board of Water Supply	<input type="checkbox"/>	
Department of Planning and Permitting	<input type="checkbox"/>	<input type="checkbox"/>
Planning Department	<input type="checkbox"/>	<input type="checkbox"/>
Other Organizations		
Sierra Club, Hawaii Chapter		<input type="checkbox"/>

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3.2.2 Agency and Public Comments

The agencies and organizations that provided written statements on the Draft EA during the public comment period are provided on Table 3-1. These letters were reviewed and considered, and are reproduced below. A response letter immediately follows each comment letter. Some comments required changes, corrections, or additions to other sections of the Final EA.

Those who provided comments on the Draft EA are being provided copies of this Final EA.

0000 00 14 1602



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
FT. SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF

October 27, 1998

RECEIVED

'98 OCT 28 P1:43

Civil Works Branch

DEPT. OF TRANSPORTATION
HIGHWAYS DIVISION

Ms. Karen Chun, Project Manager
State of Hawaii
Department of Transportation
Highways Division
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Ms. Chun:

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Interstate Route H-3 Construction Project for Access Roads in North Halawa Valley and Haiku Valley, Oahu. The following comments are provided in accordance with U.s. Army Corps of Engineers authorities to provide flood hazard information and to issue Department of the Army (DA) permits.

a. A DA permit is not required at this time. However, consultation should take place with our Operations Branch if the Highways Division proposes activities in, near, or having the potential to affect North Halawa Stream in the future. For further information regarding permit requirements, please contact Mr. Farley Watanabe at 438-9258 (extension 14) and refer to file number 990000014.

b. According to the enclosed Federal Emergency Management Agency's Flood Insurance Rate Map, panel number 1500010090 C (dated September 28, 1990), the project area is located in Zone D (areas where flood hazards have not been determined). For further information regarding the flood zone designation, please contact Ms. Jessie Dobinchick of our Engineering-Environmental Section at 438-8876.

Due to the recent 1998 reorganization of the local Corps of Engineers office, all correspondence concerning comments to environmental and planning documents should be sent to the Honolulu Engineer District, Attention: CEPOH-ED-C. Thank you for your attention to this matter.

Sincerely,

Paul Mizue, P.E.
Chief, Civil Works Branch

Enclosure

0000 00 14 1603

HWY-D(H3)
2.1705

November 12, 1998

Mr. Paul Mizue, P.E.
Chief, Civil Works Branch
Department of the Army
U.S. Army Engineer District, Honolulu
Fort Shafter, Hawaii 96858-5440

Attention: Civil Works Branch

Dear Mr. Mizue:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA), and informing us that the subject project would not require a Department of the Army permit. Prior to upgrading or replacing any bridge over North Halawa stream, we will inform the U.S. Army Corps of Engineers about this work. Also, thank you for the information about the project area's flood hazards according to the Federal Emergency Management Agency's Flood Insurance Rate Map. This information will be inserted in the Final EA.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,
Gary Legrandi
for PERICLES MANTHOS
Administrator
Highways Division

RD:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA ✓

0000 00 14 1604



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Water Resources Division
677 Ala Moana Blvd., Suite 415
Honolulu, Hawaii 96813

OCT 21 11:02 '98

DEPT OF I...

October 19, 1998

Ms. Karen Chun
State of Hawaii Department of Transportation
Highways Division
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Ms. Chun:

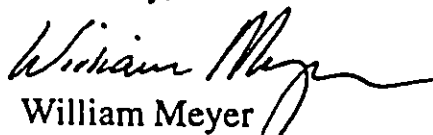
In response to the request of Mr. Pericles Manthos of the Department of Transportation, I am providing the following comments on the Draft Environmental Assessment for the Retention of the H-3 construction access roads in the North Halawa and Haiku Valleys (HWY-D(H3) 2.1245):

1. The U.S. Geological Survey (USGS) would benefit from retention of the road in the lower North Halawa Valley because it provides vehicular access to three of our streamgaging stations, all of which are located beyond the second (mauka) gate shown in Figure 1-2. Vehicular access facilitates collection of sediment and water-quality samples and provides a measure of safety during high-flow operations. We plan to operate station 16225800, near access road bridge 18, until September 30, 1999 to assess post-construction sediment loads and streamflow for the Department of Transportation (DOT). We plan to operate station 212353157533001, near bridge 5 (Figure 1-2), until September 30, 2000, to assess highway runoff effects on water quality in North Halawa Stream for the DOT. We plan to operate station 16226000, also near bridge 5, for many years as part of our cooperative hydrologic data program with the Commission on Water Resource Management.

2. The USGS does not operate gages accessible from the H-3 construction access road in the Haiku Valley.

If you have any questions, please feel free to contact Michael Wong at (808) 522-8292.

Sincerely,


William Meyer
District Chief

0000 00 14 1605

BENJAMIN J. CAYETANO
GOVERNOR



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

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
BRIAN K. MINAII
GLENN M. OKIMOTO

IN REPLY REFER TO:
HWY-D (H3)
2.1599

October 29, 1998

Mr. William Meyer, District Chief
U.S. Department of the Interior
Geological Survey
Water Resources Division
677 Ala Moana Blvd., Suite 415
Honolulu, Hawaii 96813

Dear Mr. Meyer:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA). We appreciate the information regarding your sediment and water quality monitoring activities in North Halawa Valley. We agree that these monitoring activities undertaken by your staff for the Department of Transportation would benefit from the retention of the North Halawa Valley access road.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI. Our staff will keep you informed as to the progress to amend H-3's Conservation District Use Permit.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,

Jerry Leopold
for PERICLES MANTHOS
Administrator
Highways Division

c: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA

0000 00 14 1606



RECEIVED
OCT 22 7 38 AM '98
U.S. DEPARTMENT OF TRANSPORTATION
HIGHWAYS DIVISION

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
Hawaii Division
300 Ala Moana Blvd., Room 3-306
BOX 50206
Honolulu, HI 96850
October 19, 1998

REC
'98 OCT 24 P 4:46

IN REPLY REFER TO
HEC-HI

Mr. Kazu Hayashida
Hawaii Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813-5097

Dear Mr. Hayashida:

Subject: Draft Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

OCT 21 9 33 AM '98

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the subject project. We understand that the Draft EA will serve as the mechanism to petition the Board of Land and Natural Resources to amend the CDUP to allow the retention of the access road. We also understand that under the proposed action, the general public will not be allowed access, however, access for traditional cultural practices agreed between the OHA and HDOT, and other agencies, such as the Office of Hawaiian Affairs and the U.S. Geological Survey will continue to be allowed.

As stated in the EA, the HDOT is required to inspect the H-3 viaduct or bridge structures. We would like to emphasize that this is required by FHWA under 23 CFR Section 650 - Bridges, Structures, and Hydraulics. This section states that all structures as defined as bridges located on all public roads, is to be inspected at a regular interval not to exceed 2 years.

We support the Hawaii Department of Transportation in preparing the EA for public and agency comments, to determine whether the proposed action will have a significant impact on the environment. We look forward to working with you on the action that is least damaging to the valley. If you have any questions, please call me at 541-2530.

Sincerely yours,

Richelle M. Suzuki

Richelle M. Suzuki
Transportation Engineer

cc: Karen Chun, HWY-DS

0000 00 14 1607

HWY-D (H3)
2.1598

NOV 9 1998

Mr. Abraham Wong
Division Administrator
U.S. Department of Transportation
Federal Highway Administration
300 Ala Moana Boulevard, Room 3-306
P.O. Box 50206
Honolulu, Hawaii 96850

ATTENTION: Ms. Richelle M. Suzuki

Dear Mr. Wong:


Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA) and your support for the subject project. As noted in your letter, the inspection and maintenance program for H-3 will be conducted in accordance with 23 CFR 650, and access to North Halawa Valley for traditional cultural practices will continue to be allowed in accordance with the agreement between the Department of Transportation and the Office of Hawaiian Affairs.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

RD:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA
HWY-DS (K) (L) 3-10

0000 00 14 1608



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

NOV 17 1998

BENJAMIN J. CAYETANO
GOVERNOR
SEIJI F. NAYA
DIRECTOR
BRADLEY J. MOSSMAN
DEPUTY DIRECTOR
and
DIRECTOR, OFFICE OF PLANNING

OFFICE OF PLANNING

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

Tel.: (808) 587-2846
Fax: (808) 587-2824

Ref. No. P-7797

November 13, 1998

MEMORANDUM

TO: Mr. Kazu Hayashida, Director
Department of Transportation

ATTN: Ms. Karen Chun
Project Manager

FROM: Bradley J. Mossman
Director, Office of Planning

SUBJECT: Draft Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

We have reviewed the above referenced Draft Environmental Assessment (EA) for the retention of existing construction access roads, which were used for the construction of the Interstate Highway H-3. According to the document, the roads are needed for bridge inspection and the highway maintenance program. The EA has been triggered because the current Conservation District Use Permit must be amended to allow the retention of the access roads.

We have no objections to the access roads. Thank you for the opportunity to review this document. If you have any questions or comments, please contact Lorene Maki of our staff at Extension 7-2888.

cc: Mr. Gary Gill
Office of Environmental Quality Control

✓ Mr. Richard Dahilig
Parsons Brinckerhoff-Hirota-Associates

0000 00 14 1609

NOV 20 1998

HWY-D(H3)
2.1859

November 20, 1998

Mr. Bradley J. Mossman
Director, Office of Planning
State of Hawaii
Department of Business, Economic Development
and Tourism
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Mossman:


Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA)
for the subject project.

Based on the information contained in the Draft EA, we anticipate
a Finding of No Significant Impact (FONSI). If this is the case,
you will soon receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,


PERICLES MANTHOS
Administrator
Highways Division

RD/JY:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA ✓
HWY-DS(KC)

0000 00 14 16 10

BENJAMIN J. CAYETANO
GOVERNOR
STATE OF HAWAII



OCT 30 1998

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

P.O. BOX 1879
HONOLULU, HAWAII 96805

KALI WATSON
CHAIRMAN
HAWAIIAN HOMES COMMISSION

JOBIE M. K. M. YAMAGUCHI
DEPUTY TO THE CHAIRMAN

October 29, 1998

To: The Honorable Kazu Hayashida
Director of Transportation

Attn: Ms. Karen Chun, Project Manager

From: Kali Watson, Chairman *KW*
Hawaiian Homes Commission

Subject: Interstate Route H-3, Retention of Construction
Access Roads: North Halawa Valley and Haiku Valley

Thank you for allowing our review of the draft environmental assessment for the proposal to retain existing construction access roads in North Halawa Valley and Haiku Valley.

Please note that portions of the access road in Haiku Valley cross over lands belonging to the U.S. Coast Guard, but scheduled for conveyance to the Department of Hawaiian Home Lands (DHHL). The DHHL has no objection to retention of existing improvements, and the continued maintenance and use of the Access Roads. Uses and activities on portions that will become Hawaiian home lands will be subject to approval of the Hawaiian Homes Commission.

If you have any questions, please call Joe Chu at 587-6421.

c ~~OEQC~~
Parsons-Brinckerhoff-Hirota Associates

0000 00 14 16 11

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION

Nov 13 11 17 AM '98

HWY-D(H3)
2.1773

November 16, 1998

Mr. Kali Watson, Chairman
Hawaiian Homes Commission
State of Hawaii
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Mr. Watson:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA), and your support for the subject project. For your information, we are in the process of acquiring a perpetual easement from the U.S. Coast Guard on portions of the OMEGA station property used for H-3 and the Haiku Valley access road. If the Department of Transportation considers any change in uses on portions of the access road within the perpetual easement that is different from what is reported in the Draft EA, the Department of Hawaiian Home Lands will be informed.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

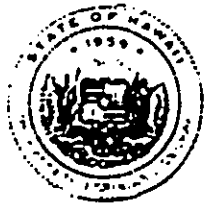
HTT:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA
HWY-DS(Kc)

0000 00 14 16 12

WILSON J. CAYETANO
GOVERNOR OF HAWAII

OCT 16 1998



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET
HONOLULU, HAWAII 96813
October 14, 1998

MICHAEL D. WILSON
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES

DEPUTY
GILBERT S. COLOMA-AGARAN

AQUACULTURE DEVELOPMENT
PROGRAM
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
CONSERVATION AND
ENVIRONMENTAL AFFAIRS
CONSERVATION AND
RESOURCES ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT
WATER RESOURCE MANAGEMENT

Ms. Karen Chun
State of Hawaii
Department of Transportation
Highways Division
Honolulu, Hawaii 96813

Dear Ms. Chun:

Subject: Draft EA Interstate Route H-3, Retention of Construction Access
Roads, North Halawa Valley and Haiku Valley, Oahu, Hawaii

We have reviewed the information provided by your October 7, 1998 letter to the Department of Land and Natural Resources, Division of Forestry and Wildlife regarding the subject draft EA and have no objections to your proposed retention of access roads through Halawa and Haiku valleys. Retaining these access roads will benefit agencies needing access into these remote areas for fire suppression, revegetation and monitoring, pest control, public safety and rescue purposes, or other resource management activities.

Thank you for the opportunity to comment on the draft EA.

Sincerely yours,

Michael G. Buck
Administrator

C: DOFAW, Oahu Branch
OEQC, Gary Gill
Parsons et al. Associates, Richard Dahilig

0000 00 14 16 13

BENJAMIN J. CAYetano
GOVERNOR



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

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
BRIAN K. MINAII
GLENN M. OKIMOTO

IN REPLY REFER TO:
HWY-D (H3)
2.1687

November 5, 1998

Mr. Michael G. Buck, Administrator
State of Hawaii
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Buck:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA) and your support for the subject project. We agree that the access roads will benefit the agencies needing access into the valleys for the purposes mentioned in your letter.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Pericles Manthos".

PERICLES MANTHOS
Administrator
Highways Division

0000 00 14 16 14

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



MICHAEL D. WILSON
CHAIRPERSON

ROBERT G. GIRALD
DAVID A. NOBRIGA
LAWRENCE H. MIKE
RICHARD H. COX
HERBERT M. RICHARDS JR.

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU HAWAII 96809

98 NOV 12
TIMOTHY B. JOHNS
DEPUTY DIRECTOR

October 29, 1998

TO: Ms. Karen Chun, Project Manager
Highways Division
Department of Transportation

FROM: Timothy E. Johns, Deputy Director *Timothy E. Johns*
Commission on Water Resource Management (CWRM)

SUBJECT: Draft Environmental Assessment, Interstate Route H-3, Retention of Construction
Access Roads: North Halawa Valley and Haiku Valley, Oahu, Hawaii

FILE NO.: HWY-D(H3) 2.1245

Thank you for the opportunity to review the subject document. Our comments related to water resources are marked below.

In general, the CWRM strongly promotes the efficient use of our water resources through conservation measures and use of alternative non-potable water resources whenever available, feasible, and there are no harmful effects to the ecosystem. Also, the CWRM encourages the protection of water recharge areas which are important for the maintenance of streams and the replenishment of aquifers.

- We recommend coordination with the county government to incorporate this project into the county's 20-year Water Use and Development Plan, which is subject to regular updates.
- We recommend coordination with the Land Division of the State Department of Land and Natural Resources to incorporate this project into the 20-year State Water Projects Plan, which is subject to regular updates.
- We are concerned about the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- A Well Construction Permit and/or a Pump Installation Permit from the CWRM would be required before ground water is developed as a source of supply for the project.
- The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit from the CWRM would be required prior to use of this source.
- Groundwater withdrawals from this project may affect streamflows. This may require an instream flow standard amendment.
- If the proposed project diverts additional water from streams or if new or modified stream diversions are planned, the project may need to obtain a stream diversion works permit and petition to amend the interim instream flow standard for the affected stream(s).
- If the proposed project performs any work within the bed and banks of a stream channel, the project may need to obtain a stream channel alteration permit and a petition to amend the interim instream flow standard for the affected stream(s).
- OTHER:

If there are any questions, please contact Lenore Nakama at 587-0218.

c: OEQC
Parsons Brinkerhoff

0000 00 14 16 15

HWY-D(H3)
2.1847

NOV 23 1998

Mr. Timothy E. Johns, Deputy Director
Commission on Water Resource Management
State of Hawaii
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Johns:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA) for the subject project. We support the objectives of the Commission on Water Resource Management of efficiently using water resources, preventing adverse effects to the ecosystem, and protecting water recharge areas. Therefore, H-3 includes infrastructure designed to prevent contamination of water resources. We would like to provide the following responses to your comments:

First comment. The proposed action does not require review or approval by the State of Hawaii Department of Health (DOH). However, the Draft EA was submitted to DOH under HRS Chapter 343 and HAR Chapter 200 regulations. As described in Section 2.2.1.2, the proposed action will have minimal or no effect on the quality of water resources because of restricted vehicular access on the access roads.

Second comment. Thank you for this information. The replacement or upgrade of certain bridges (see Section 1.5.1.2 of Draft EA) will not alter nor affect the flow of North Halawa Stream.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

0000 00 14 16 16

Mr. Timothy E. Johns, Deputy Director
Page 2

HWY-D(H3)
2.1847

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,


KAZUO HAYASHIDA
Director of Transportation

RD/JY:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA ✓
HWY-DS(KC)

0000 00 14 16 17



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
PO BOX 621
HONOLULU, HAWAII 96809
NOV - 9 1998¹

NOV 10 RECEIVED
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DEPT. OF TRANSPORTATION
HIGHWAYS DIVISION

AQUACULTURE DEVELOPMENT PROGRAM
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
CONSERVATION AND RESOURCES ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND DIVISION
STATE PARKS
WATER RESOURCE MANAGEMENT

Ref.: PB:SL

MEMORANDUM

DEPT. OF TRANSPORTATION
HIGHWAYS DIVISION

98 NOV 12 AM 0:12

RECEIVED

TO: The Honorable Kazu Hayashida, Director
Department of Transportation

ATTN: Pericles Manthos, Administrator
Highways Division

FROM: Dean Y. Uchida, Administrator
Land Division

SUBJECT: Draft Environmental Assessment for the Retention of
Construction Access Roads Adjacent to Interstate Route
H-3, North Halawa Valley and Haiku Valley, Oahu, Hawaii

We are in receipt of the Draft Environmental Assessment (DEA) for the subject project and have the following comments.

The DEA provides an excellent overview of the history and issue surrounding the construction and purposes of the two construction roads. Our only substantive comments on the DEA are as follows.

Section 1.5.1.2 of the DEA discusses a plan by the Department of Transportation (DOT) to stabilize a slope adjacent to a 1,400 foot stretch of the construction road in North Halawa Valley. One option under consideration is to raise the vertical profile of the access road to lessen the grade of the adjacent slope. This would require approximately 30,000 to 40,000 cubic yards of fill.

This project, which would involve several thousand truck hauls, could create serious sedimentation impacts. We question whether the benefits of slope reduction justify the cost and potential impacts stemming from project construction. We would like to see some additional analysis of this project, such as a discussion of the current erosion rates from the slope, and other possible alternatives to control soil erosion.


0000 00 14 16 18

Finally, DOT should submit a formal request to the Department of Land and Natural Resources (DLNR) to consider the proposed condition modification before the Land Board. If DOT wishes to pursue additional road work, this should also be included in that request. We will accept a letter from DOT with a copy of the Final EA, for processing purposes.

Also, please include a list of agencies and groups that were consulted for this project.

Please feel free to call Sam Lemmo of the Planning Branch, at 587-0381, should you have any questions on this matter.

Alpha,


Dean Y. Uchida, Administrator
Land Division

cc: Chairman's Office
Oahu District Land Agent
Oahu Board Member

0000 00 14 16 19

HWY-D (H3)
2.1881

November 23, 1998

Mr. Dean Y. Uchida, Administrator
Land Division
State of Hawaii
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Uchida:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA) for the subject project. We appreciate your view that the Draft EA provides an excellent overview of the history and issues of the access roads. We would like to provide the following responses to your comments:

Third and fourth paragraphs. The current plan of raising the vertical profile of 1,400 feet of the North Halawa Valley access road will provide a long-term solution to erosion problems.

First and second paragraphs on page two. Thank you for this information. We plan to submit a formal request to the Board of Land and Natural Resources to modify H-3's conservation district use permit as soon as we complete the HRS Chapter 343 process. We will follow your instructions, including providing you a copy of the Final EA.

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Mr. Dean Y. Uchida, Administrator
Page 2
November 23, 1998

HWY-D(H3)
2.1881

If you have any question, please contact Karen Chun at 587-2125

Very truly yours,



PERICLES MANTHOS
Administrator
Highways Division

RD/JY:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA
HWY-DS (KC)

0000 00 14 1621

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



RECEIVED
OCT 22 11 26 AM '98
DEPT. OF TRANSPORTATION
HIGHWAYS DIVISION

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

P. O. BOX 621
HONOLULU, HAWAII 96809

CHAIRPERSON
MICHAEL D. WILSON
BOARD OF LAND AND NATURAL RESOURCES

DEPUTY DIRECTOR
GILBERT S. COLOMA-AGARAN

- AQUACULTURE DEVELOPMENT PROGRAM
- AQUATIC RESOURCES
- BOATING AND OCEAN RECREATION
- CONSERVATION AND ENVIRONMENTAL AFFAIRS
- CONSERVATION AND RESOURCES ENFORCEMENT
- CONVEYANCES
- FORESTRY AND WILDLIFE
- HISTORIC PRESERVATION
- LAND MANAGEMENT
- STATE PARKS
- WATER AND LAND DEVELOPMENT

October 19, 1998

Mr. Pericles Manthos, Administrator
Highways Division
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813

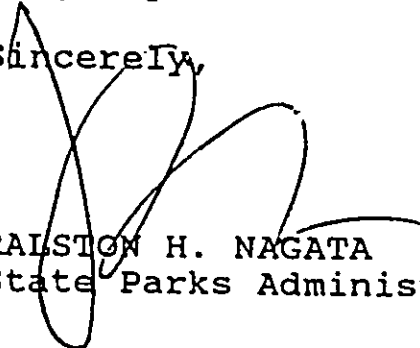
Dear Mr. Manthos:

Subject: Draft Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

While the State Parks Division no longer is the reviewing agency for the department, as the Historic Preservation Division function rests with another division, we appreciate the opportunity to comment, having been involved for many years in the project.

We believe retention of the access roads is a prudent thing to do to facilitate regular inspections of the underside and supports of the nearly continuous elevated highway sections.

Sincerely,


RALSTON H. NAGATA
State Parks Administrator

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98 OCT 22 P2:19
DEPT. OF HIGHWAYS

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AMIN J. CAYETANO
GOVERNOR



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

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
BRIAN K. MINAII
GLENN M. OKIMOTO

IN REPLY REFER TO:
HWY-D (H3)
2.1600

NOV 4 1998

TO: RALSTON H. NAGATA
STATE PARKS ADMINISTRATOR
DEPARTMENT OF LAND AND NATURAL RESOURCES

FROM: *for* PERICLES MANTHOS *Jerry Jepsander*
ADMINISTRATOR
HIGHWAYS DIVISION

SUBJECT: ENVIRONMENTAL ASSESSMENT
INTERSTATE ROUTE H-3
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
OAHU, HAWAII

Thank you for reviewing the Draft Environmental Assessment (EA) and your support for the subject project.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

c: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA

0000 00 14 1623

BENJAMIN J. CAYETANO
GOVERNOR



OCT - 9 1998

GARY GILL
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4186
FACSIMILE (808) 586-4186

October 8, 1998

Kazu Hayashida, Director
Department of Transportation
869 Punchbowl St.
Honolulu, HI 96813

Attn: Karen Chun

Dear Mr. Hayashida:

Subject: Draft Environmental Assessment (EA) for H-3 Retention of Access Roads,
North Halawa and Haiku

In order to reduce bulk and conserve paper, we recommend printing on both sides of the pages in the final document. In addition please include the following in the final EA:

1. Contacts: Include copies of any correspondence received during the preconsultation period as well as the public comment period for the draft EA.
2. Significance criteria: Include a discussion of findings and reasons, according to the significance criteria listed in HAR 11-200-12, that supports your forthcoming determination, either Finding of No Significant Impact (FONSI) or EIS preparation notice. The discussion may be brief but cannot simply be a reiteration of the criteria in the negative.
3. Windward Archeological Area: Section 2.3.4, *Archeology and Historic Resources*, lists a windward area as the "Luluku Discontiguous Archeological District," but Figure 2-3 lists this area as "Luluku Discontinuous Archeological District." Please make the correction in the final EA.
4. Public access: The EA states that access into the valleys will be denied to the public. Under what conditions will access along the road be granted? Will

0000 00 14 1624

Kazu Hayashida
October 8, 1998
Page 2

access be granted to native Hawaiian groups for traditional practices? Please evaluate whether any element of this project (gate, fence or other obstruction) will impact traditional and customary gathering rights of native Hawaiians.

If you have any questions, call Nancy Heinrich at 586-4185.

Sincerely,



GARY GILL
Director

c: Jason Yazawa, PBH

0000 00 14 1625

NOV 9 1998

HWY-D(H3)
2.1597

TO: GARY GILL, DIRECTOR
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

FROM: *for* KAZU HAYASHIDA
DIRECTOR OF TRANSPORTATION *[Signature]*

SUBJECT: ENVIRONMENTAL ASSESSMENT
INTERSTATE ROUTE H-3
RETENTION OF CONSTRUCTION ACCESS ROADS:
NORTH HALAWA VALLEY AND HAIKU VALLEY
OAHU, HAWAII

Thank you for your comments on the Draft Environmental Assessment (EA) for the subject project. Responses to your comments are provided below.

First paragraph. As recommended, the Final EA will be printed on two sides.

Comment 1. Copies of correspondence including our responses during the Draft EA comment period will be included in Chapter 3 of the Final EA.

Comment 2. Discussion of whether a Finding of No Significant Impact (FONSI) determination is appropriate for the project will be included in Chapter 4 of the Final EA. This evaluation will be based on Significance Criteria specified in Section 11-200-12 of the Hawaii Administrative Rules.

Comment 3. Figure 2-3 will be corrected in the Final EA.

Comment 4. In accordance with an agreement between the Department of Transportation and the Office of Hawaiian Affairs, access into North Halawa Valley has been allowed and will be allowed in the future for traditional cultural practices. A sign posted at the gate indicates access procedures.

If you have any question, please contact Karen Chun at 587-2125.

RD:mc

bc: Richard Dahilig, PBHA
HWY-DS (K. Chun)

0000 00 14 1626

PHONE (808) 594-1888

FAX (808) 594-1865



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

OCT 26 1998

October 21, 1998

Mr. Kazu Hayashida, Director
State of Hawaii
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813
Attention: Karen Chun

Re: Draft Environmental Assessment for the Interstate Route H-3, Retention of Construction
Access Roads: North Halawa Valley and Haiku Valley, O'ahu, Hawaii

Dear Mr. Hayashida:

The Office of Hawaiian Affairs (OHA) has had the opportunity to review the draft Environmental Assessment (DEA) for the Interstate Route H-3, Retention of Construction Access Roads: North Halawa Valley and Haiku Valley, O'ahu, Hawaii

The DEA has been prepared to accompany a request to the Board of Land and Natural Resources to amend the Conservation District Use Permit by removing Condition 1.15. Removal of Condition 1.15 will allow State of Hawaii Department of Transportation (HDOT) to retain the access roads in Halawa and Haiku Valleys. The justification for retaining the access roads is the need to periodically service the bridge structures used in construction of the freeway. At this time, we have the following comments and concerns.

Section 1.2.4 Archaeological Findings and Section 2.3.4 Archaeology and Historic Resources give a brief, cursory mention of the cultural resources found along the route of the freeway. No mention is made of the many studies and reports prepared by HDOT in conjunction with building the highway. The reports should be attached as appendices to the DEA.

Section 1.4.2 Archaeological Resources, states that limited access by OHA personnel or its agents will be granted to maintain and restore the North Halawa Valley archaeological sites. We have several concerns with the limited information contained in this section.

The paragraph needs to be broadened to acknowledge that Native Hawaiian access to the valley is currently allowed under an agreement between HDOT and OHA. Most importantly, the

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Kazu Hayashida, Director
Department of Transportation
October 21, 1998
Page two

The paragraph needs to be broadened to acknowledge that Native Hawaiian access to the valley is currently allowed under an agreement between HDOT and OHA. Most importantly, the information should be expanded in this section as well as in Section 1.5.1 to include continued Native Hawaiian access to the cultural sites.

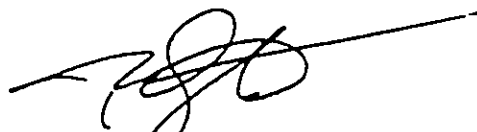
In addition, there should be an acknowledgement and discussion of current negotiation on an agreement between OHA and HDOT which will allow OHA to restore, maintain and interpret the cultural resources found within Halawa valley and along the Kaneohe side of the freeway. A frank discussion of this agreement is necessary since OHA anticipates that it will request the Board of Land and Natural Resources open the valley to greater public access once protection and interpretation of the cultural sites has been completed.

We have similar concerns with Section 1.5.1.3 Proposed Uses of the Access Roads. Again, no mention of current or future access for Native Hawaiian exercise of cultural practice is mentioned in this Section.

Finally, Section 2.3.3.2 should include the thought that presently HDOT and OHA are concerned that unlimited public access could intentionally or unintentionally damage the cultural and archaeological sites in the valley. However, it is intended that once an agreement between HDOT and OHA has been completed and the cultural and archaeological sites have been protected and interpreted, OHA may petition the Board of Land and Natural Resources for greater public access.

If you have any questions, please contact Colin Kippen Land and Natural Resources Division Officer or Lynn Lee, EIS Planner at 594-1938.

Sincerely,



Randall Ogata
Administrator



Colin Kippen
Acting Land and Natural Resources
Division Officer

cc: Board of Trustees
Gary Gill -OEQC
Richard Dahilig - Parsons Brinkerhoff Hirota Assoc.

0000 00 14 1628

AMIN J. CAYETANG
GOVERNOR



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

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
BRIAN K. MINAAI
GLENN M. OKIMOTO

IN REPLY REFER TO:
HWY-D (H3)
2.1678

November 5, 1998

Mr. Randall Ogata, Administrator
State of Hawai'i
Office of Hawaiian Affairs
711 Kapiolani Boulevard, Suite 500
Honolulu, Hawaii 96813

Dear Mr. Ogata:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for your interest and comments on the Draft Environmental Assessment (EA) for the subject project. We would like to provide the following responses to your comments:

Third paragraph. We feel that the level of detail provided in Section 1.2.4 and 2.3.4.1 of the Draft EA, which describes the existing archaeological and historic sites adjacent to the access roads is consistent with the purpose of this document, which is to propose the retention of the existing access roads for highway maintenance purposes. Adverse archaeological impacts are not anticipated if the access roads are retained. Therefore, the Draft EA provides only a brief description of the cultural resources along H-3 and does not include the H-3 archaeological and historic reports as appendices.

Fourth, fifth and seventh paragraphs. Sections 1.4.2 and 1.5.1.3 will be expanded in the Final EA to state that access into North Halawa Valley has been allowed and will be allowed in the future for traditional cultural practices.

Sixth paragraph. Section 1.5.3 of the Draft EA states that the Federal Highway Administration and State of Hawaii Department of Transportation (HDOT) have committed \$11 million to preserve and enhance the archaeological and cultural sites in North Halawa Valley and at Kaneohe Interchange by the Office of Hawaiian Affairs. The discussion will be expanded in the Final EA to

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Mr. Randall Ogata, Administrator
Page 2
November 4, 1998

HWY-D(H3)
2.1678


disclose the possibility that OHA may petition the Board of Land and Natural Resources (BLNR) for greater public access to the North Halawa Valley sites. HDOT would not object to such a request. However, since OHA has not conducted further studies regarding public access to the cultural sites and preservation measures, the petition related to these efforts would require a separate amendment to the CDUP. At this time, HDOT will only be petitioning the BLNR for the retention of the access roads.

Eighth paragraph. Section 2.3.4.2 of the Final EA will include discussion that public access to the North Halawa Valley archaeological and cultural sites may cause intentional or unintentional damage to the sites. However, protection of the sites is very important to OHA and HDOT. Therefore, it can be assured that the plans to be prepared for OHA and HDOT will include appropriate measures to prevent damage. The Final EA will also disclose that an agreement between OHA and HDOT is in process which describes restoration, maintenance and interpretive activities.

Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

We look forward to working with you on this matter and if you have any question, please contact Karen Chun at 587-2125.

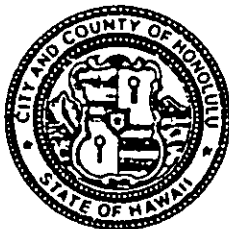
Very truly yours,


for PERICLES MANTHOS
Administrator
Highways Division

0000 00 14 1630

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET • HONOLULU, HAWAII 96813
PHONE: (808) 523-4414 • FAX: (808) 527-6743



REMY HARRIS
MAYOR

NOV 10 1998

JAN NAOE SULLIVAN
DIRECTOR

LORETTA K.C. CHEE
DEPUTY DIRECTOR

98-07812 (ST)

'98 EA Comments - various zones

November 9, 1998

Mr. Kazu Hayashida, Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Attn: Karen Chun

Dear Mr. Hayashida:

Draft Environmental Assessment (EA)
Retention of Existing H-3 Access Roads
North Halawa and Haiku Valleys, Oahu
Tax Map Keys: various

We have reviewed the Draft EA for the above-referenced project received on October 12, 1998, and have no comments to offer.

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Steve Tagawa of our staff at 523-4817.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jan Naoe Sullivan".
JAN NAOE SULLIVAN
Director of Planning
and Permitting

JNS:am

cc: Office of Environmental Quality Control
Richard Dahilig, Parsons Brinckerhoff-
Hirota-Associates

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NOV 28 1983

Ms. Jan Naoe Sullivan, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Sullivan:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment (EA)
for the subject project.

Based on the information contained in the Draft EA, we anticipate
a Finding of No Significant Impact (FONSI). If this is the case,
you will soon receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

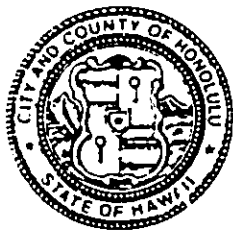
RD/JY:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA ✓
HWY-DS(KC)

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PLANNING DEPARTMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET 8TH FLOOR • HONOLULU, HAWAII 96813-3017
PHONE (808) 523-4533 • FAX (808) 523-4950



REMY HARRIS
MATCH

NOV - 2 1998

PATRICK T. ONISHI
CHIEF PLANNING OFFICER
DONAL HANAIKE
DEPUTY CHIEF PLANNING OFFICER

GW 10/98-1986

November 2, 1998

Honorable Kazu Hayashida, Director
Department of Transportation
Highways Division
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813

Attention: Karen Chun, Project Manager

Dear Mr. Hayashida:

Draft Environmental Assessment (DEA),
Interstate Route H-3, Retention of Construction Access
Roads: North Halawa Valley and Haiku Valley, Oahu, Hawaii

Thank you for providing a copy of the above-referenced DEA for our review. The proposed project seeks to retain existing access roads used during construction of H-3. Condition I.15 of H-3's conservation district use permit specifies "upon completion of the construction of H-3 through North Halawa Valley, the construction access road shall be removed and to the extent possible, the affected areas shall be restored to its natural state." If retained, HDOT proposes to use the roads to facilitate its bridge inspection and highway maintenance program for H-3.

We have a number of concerns regarding this proposal which you may wish to consider during preparation of the Final Environmental Assessment (FEA) for this project:

1. Section 1.3 of the DEA asserts the intention of the CDUP requires removal of both the North Halawa Valley and Haiku Valley access roads, but the information provided does not completely support that assertion. In fact, the DEA's citation of Condition I.15 of the CDUP clearly indicates that only the North Halawa Valley access road is subject to its conditions. The DEA does not establish a requirement for removal of the Haiku Valley access road. The FEA should re-examine this assertion and, if appropriate, should not consider the Haiku Valley access road.

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Honorable Kazu Hayashida, Director
Department of Transportation
November 2, 1998
Page 2

2. Section 1.5.1.3 of the DEA states that the general public will not be allowed access to the roads. This is inconsistent with existing City policy to increase and enhance public access to the visual, cultural and historical, open space and recreational resources of the island. The FEA should discuss those factors that require prohibition of public access to the areas served by the subject roads.
3. City Councilmember Steve Holmes and members of the Kaneohe community have requested that use of the existing Haiku Valley access road be permitted for pedestrians and bicyclists using the proposed Haiku Valley Cultural Nature Park and for park maintenance activities. Section 2.3.3.2 of the DEA states that this use of the road may have to be pursued under a separate conservation district use permit application, but does not explain why this use cannot be included in the current CDUP amendment request. The FEA should explain why this request cannot be accommodated within the present CDUP amendment.
4. Section 1.5 of the DEA does not address the potential to mount inspection and maintenance efforts from the surface of H-3 itself. Section 1.5.1.3 of the document also does not adequately address why it should be necessary to maintain the paved surface roads to support a bi-annual inspection program which is apparently mounted from a 4-wheel-drive vehicle. The FEA should discuss the types of inspections and repairs that may be accomplished from the H-3 deck and should provide an adequate discussion of the need to provide paved roads for bi-annual use by off-road vehicles.
5. Section 2.1 of the DEA explicitly states that construction impacts and mitigation measures for the proposed project are not discussed therein. Instead, the DEA discusses the impacts and mitigation measures associated with the single identified alternative to the proposed action. This approach characterizes the proposed action as the "lesser of two evils," but fails to provide any discussion or analysis of the impacts of the proposed action. For example, the DEA does not address the anticipated construction impacts and required mitigation measures for the proposal to regrade more than 1/4 mile of the North Halawa Valley road nor does it even provide an estimate of the number of bridges or other stream crossings that will have to be replaced or reconstructed. The FEA should discuss the construction impacts and mitigation measures required to implement the proposed action.
6. Chapter 2 of the DEA fails to address many of the long-term impacts of the proposed action. For example, there is no discussion of the long-term effects of run-off contributed by the existing roadway's impervious surfaces; no discussion of the potential effects of overtopping of the roadway and stream crossings during periods of high precipitation; and no discussion of the need to provide continuing maintenance and repair of the retained roads themselves. The FEA should provide a discussion of the long-term impacts of the proposed action.


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Honorable Kazu Hayashida, Director
Department of Transportation
November 2, 1998
Page 3

We believe a finding of no significant impact (FONSI) for this project based solely upon the information provided in the DEA would be erroneous.

If you should have any questions or concerns regarding these comments, please do not hesitate to contact Gordon Wood of the Planning Department staff at 527-6073.

Yours very truly,


PATRICK T. ONISHI
Chief Planning Officer

PTO:lh

c: Gary Gill, Director, Office of Environmental Quality Control
Richard Dahilig, Parson Brinckerhoff Hirota Associates

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NOV 24 1998

HWY-D (H3)
2.1871

Mr. Patrick T. Onishi
Chief Planning Officer
Planning Department
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813-3017

Dear Mr. Onishi:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for your comments on the Draft Environmental Assessment (EA) for the subject project. We would like to provide the following responses to your comments:

Comment 1. As stated in Section 1.3, we believe that it was the intention of the 1983 Board of Land and Natural Resources (BLNR) that all H-3 construction access roads in the conservation district be removed upon completion of H-3, despite only mentioning North Halawa Valley in Condition I.15.

Comment 2. Section 1.5.1.3 of the Final EA will be revised to describe the agreement between the State of Hawaii Department of Transportation (HDOT) and the State of Hawaii Office of Hawaiian Affairs (OHA) that prohibits general public access into North Halawa Valley because of concern about intentional or unintentional damage to cultural sites in the valley. This might change when OHA completes studies on the cultural sites. Nevertheless, access for traditional cultural practices has been and will continue to be allowed. Certain areas of Haiku Valley will be conveyed by the U.S. Coast Guard to the State of Hawaii Department of Hawaiian Home Lands (DHHL), with the H-3 corridor on a perpetual easement to HDOT for inspection and maintenance purposes. We do not know whether DHHL will allow access for other purposes.

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Mr. Patrick T. Onishi
Page 2

HWY-D(H3)
2.1871

Comment 3. The proposed action is for H-3's inspection and maintenance program. We believe that obtaining permission from the BLNR to retain the access roads for other uses is premature without knowing OHA's plans for the cultural sites. In general, we do not object to public use of the access roads if such uses do not compromise public safety or affect our operations.

Comment 4. HDOT personnel can hike into the valley(s), which would be the method of inspections if the access roads are removed. Conducting inspections from the surface of H-3 is not preferred because of its limitations and safety and traffic concerns. The major benefit of retaining the paved access roads is when heavy vehicles and equipment are needed to conduct maintenance or repair work. Under the remove roads alternative, we would have no choice but to clear a road to the work site for these vehicles.

Comment 5. Section 2.1 will be revised to describe the construction impacts of the proposed action, which includes work to stabilize the slope along 1,400 feet of the North Halawa Valley access road. As will be described in this section, sedimentation impacts will be mitigated by various erosion control measures utilized during and after construction. The bridges that will be upgraded or replaced include two wood deck bridges on the Haiku Valley access road. Work to upgrade or replace any bridge along the North Halawa Valley access road will be minor and should not affect the stream bed.

Comment 6. We respectfully disagree that the Draft EA fails to address or disclose long-term impacts of the proposed action. With regards to the examples given:

- Section 2.2.1.2 states that quality of water resources in the valley (North Halawa stream and groundwater) would not be affected by the proposed action because of restricted vehicular access on the access roads.
- Section 2.2.1.2 states that during a severe storm (e.g., 50- or 100-year), the stream and lower profile bridges would be overtopped. This section in the Final EA will be expanded to state that since North Halawa Valley is undeveloped, the probability of effect on life and property during a severe storm is remote. However, we will work with Oahu Civil Defense to develop a flash flood warning system for the valley.
- The Final EA will disclose information on routine inspection and maintenance of the access roads, as requested.

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Mr. Patrick T. Onishi
Page 3

HWY-D(H3)
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First paragraph on third page. Based on the information contained in the Draft EA and comments from agencies and organizations, we anticipate a Finding of No Significant Impact (FONSI). If a FONSI is declared, you will receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,

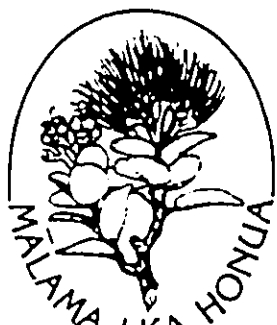


KAZU HAYASHIDA
Director of Transportation

RD/JY:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA
HWY-DS(KC)

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SIERRA CLUB, HAWAI'I CHAPTER

P.O. Box 2577,
Honolulu, Hawai'i 96803
(808) 538-6616

NOV 1998

Karen Chun

Department of Transportation, Highways Division
869 Punchbowl St.
Honolulu, HI 96813

11/5/98

Richard Dahilig
Parsons, Brinckerhoff-Hiota Associates
1001 Bishop St., Pacific Tower #3000

Gary Gill
OEQC
(via fax: 586-4186)

The Sierra Club, Hawai'i Chapter objects to the Draft Environmental Assessment for the retention of H-3 access roads at North Halawa Valley and Haiku Valley.

Despite the propaganda put out by DOT's press office, the legacy of H-3 is a sad one. It is a story filled with DOT misrepresentations and legal manipulations. H-3 is a cultural and environmental insult.

Because we recognize that removal of these roads (which DOT originally promised to remove) could create even greater environmental harm and reduce access by native Hawaiians to cultural sites, we can understand why retaining them may be appropriate.

If DOT is intent on retaining these roads, however, it should prepare an EA that fully explores alternatives. One alternative worthy of study would be to allow bicyclists to use these roads if it can be done in a culturally appropriate manner.

It is unlikely that the presence of bicyclists in Halawa Valley is more culturally offensive than the presence of the H-3 monolith or more offensive than the attitude demonstrated by DOT over the years. Nevertheless, all parties need to be consulted to ensure that public access can be provided in a culturally appropriate manner.

A study examining converting the access roads into a bikepath with no cars should also discuss the existence of maintenance tunnels that bicyclists could use to cross the Ko'olau. In the past, DOT has steadfastly refused to consider the possibility of letting bicyclists use these tunnels. It is time to explore this possibility.

Sincerely,

David Kimo Frankel

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HWY-D(H3)
2.1848

November 20, 1998

Mr. David Kimo Frankel
Sierra Club, Hawaii Chapter
P.O. Box 2577
Honolulu, Hawaii 96803

Dear Mr. Frankel:

Subject: Environmental Assessment
Interstate Route H-3
Retention of Construction Access Roads:
North Halawa Valley and Haiku Valley
Oahu, Hawaii

Thank you for your comments on the Draft Environmental Assessment (EA) for the subject project. We agree with your statement that removal of the North Halawa Valley and Haiku Valley access roads would cause greater environmental harm than retaining them.

We do not agree that the Draft EA should have explored alternatives that include bicycle use of the access roads. The Draft EA was prepared to obtain public comments on our proposal to retain the access roads for the H-3's bridge inspection and highway maintenance needs. As discussed in the Draft EA, HDOT is planning to petition the Board of Land and Natural Resources (BLNR) to amend the H-3 conservation district use permit by removing the condition that requires that the access roads be removed after H-3 is completed. Our petition to the BLNR will not include general public use of the access roads for bicycling or hiking. However, the Office of Hawaiian Affairs has indicated to us that they may petition the BLNR for greater public access after they have determined appropriate protection and restoration of the cultural sites in the valley.

In your letter, you also asked that the HDOT consider allowing bicyclists to use the H-3 maintenance tunnel, which crosses the Ko'olaus. Presently, the narrow one-lane tunnel is only used by maintenance personnel. It would not be appropriate nor safe for the tunnel to be used jointly by maintenance vehicles and bicyclists.

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Mr. David Kimo Frankel
Page 2
November 20, 1998

HWY-D(H3)
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Based on the information contained in the Draft EA, we anticipate a Finding of No Significant Impact (FONSI). If this is the case, you will soon receive a copy of the project's Final EA/FONSI.

If you have any question, please contact Karen Chun at 587-2125.

Very truly yours,



Jr
PERICLES MANTHOS
Administrator
Highways Division

RD/JY:mc

bc: Gary Gill, Office of Environmental Quality Control
Richard Dahilig, PBHA
HWY-DS(KC)

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Chapter 4 Finding of No Significant Impact

In accordance with the Hawai'i Revised Statutes, Chapter 343 and the Hawai'i Administrative Rules (HAR), Sections 11-200-9 and 11-200-11.2, the State of Hawai'i Department of Transportation (HDOT), as the accepting authority, is issuing this Finding of No Significant Impact (FONSI) for the proposed action. This FONSI will be announced in the December 8, 1998 publication of the Environmental Notice. This FONSI determination is based on an assessment of project impacts, as described in Chapter 2, in relation to the Significance Criteria specified in HAR 11-200-12(b). The Significance Criteria are italicized below, followed by brief assessments of the proposed action.

Involves an irrevocable commitment to loss or destruction of any natural or cultural resource - The proposed action will not cause the loss or destruction of any natural or cultural resource.

Curtails the beneficial uses of the environment - General public use of the North Halawa Valley access road will not be allowed because of the presence of sensitive cultural sites in the valley. Certain agencies, such as the Office of Hawaiian Affairs (OHA), the Department of Land and Natural Resources, and the U.S. Geological Survey, will be allowed use of the access road to conduct their programs. Access into North Halawa Valley has been and will continue to be allowed for traditional cultural practices, in accordance with an agreement between HDOT and OHA. However, OHA may seek greater public access after it has completed studies on the North Halawa Valley archaeological/cultural sites. The proposed action does not include public use of the Haiku Valley access road.

Conflicts with the State's long-term environmental policies or goals and guidelines expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders - The proposed action is consistent with the environmental goals and objectives of the State of Hawai'i.

Substantially affects the economic or social welfare of the community or State - The proposed action will not affect any community.

Substantially affects public health - The proposed action will not adversely affect public health. The proposed action will facilitate HDOT inspection and maintenance of H-3 bridges so that public safety is not compromised.

Involves substantial secondary impacts - The proposed project will not cause secondary impacts.

Involves substantial degradation of environmental quality - Since North Halawa Valley and Haiku Valley have been altered by construction of H-3, the proposed action will have minimal or no effect on environmental quality.

Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions - The proposed action will not cause commitments for other actions. Therefore, cumulative impacts are not anticipated.

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Substantially affects a rare, threatened or endangered species, or its habitat - There are no rare, threatened or endangered plant or animal species in the area directly affected by the proposed action.

Detrimentially affects air or water quality or ambient noise levels - Air quality and noise conditions in North Halawa Valley and Haiku Valley are mostly affected by the operation of H-3. The retention of the access roads will have very little effect, if any, on these conditions. Since potential water quality impacts have always been a concern of H-3, mitigation was included with the project to prevent adverse effects on water resources. Under the proposed action, very few vehicles will use the access roads. Therefore, adverse impacts to surface and ground water resources are not anticipated.

Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a floodplain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters - North Halawa Valley is an environmentally sensitive area that is vulnerable to flooding during 50- or 100-year storms. Haiku Valley is also environmentally sensitive area that is vulnerable to erosion due to prevalent weather patterns. These environmental conditions can be damaging to H-3's viaduct structures, which is a major reason HDOT is concerned about the interstate's inspection and maintenance program.

Substantially affects scenic vistas and viewplanes identified in county or state plans or studies - The proposed action will not affect scenic vistas or viewplanes.

Requires substantial energy consumption - The proposed action will not require substantial energy consumption.

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Chapter 5 References

- Cox, Wendall and Jean Love, The Best Investment A Nation Ever Made, A Tribute to the Dwight D. Eisenhower System of Interstate and Defense Highways, for the American Highway Users Alliance, June 1996
- Hawaii Newspaper Agency, The Honolulu Advertiser, August 27, 1998, September 8, 1998
- Macdonald, Gordon A., Agatin T. Abbot and Frank L. Peterson, Volcanoes in the Sea, The Geology of Hawaii, University of Hawaii Press, 1983
- Office of Hawaiian Affairs, Native Hawaiian Historic Preservation Council, Meanings and Mitigations: Findings and Recommendations Related to Adverse Impacts Associated With The Route of the H-3 Highway on North Halawa Valley Sites, August 1992
- State of Hawaii, Attorney General, Civil No. 92-2435-07 (Condemnation), Certificate of Deposit and Possession, May 14, 1993
- State of Hawaii, Board of Land and Natural Resources, In the Matter of Conservation District Use Application of the State of Hawaii Department of Transportation: To Permit as a Conditional Use of the Construction of the Interstate Route H-3 Highway, Through North Halawa Valley Island of Oahu, Hawaii, November 18, 1983
- State of Hawaii, Department of Land and Natural Resources, Historic Preservation Division, Re-Evaluation of the Functional Interpretations and Significance Evaluations of Sites B1-75 & B1-85, H-3 Project, Halawa Ahupua'a, 'Ewa, O'ahu, 1992
- State of Hawaii, Department of Transportation - Highways Division, Mitigation and Enhancement Plan, Interstate Route H-3 Within North Halawa Valley - Kane'ohe Interchange, July 1996
- U.S. Department of Transportation, Federal Highway Administration, Hawaii State Historic Preservation Officer, the Advisory Council on Historic Preservation, Memorandum of Agreement (prepared under Section 106 of the National Historic Preservation Act), 1987
- U.S. Department of Transportation, Federal Highway Administration and the State of Hawaii, Department of Transportation, Interstate Route H-3, The North Halawa Valley Alignment, Final Supplement to the Interstate Route H-3 Environmental Impact Statement, December 10, 1980
- U.S. Department of Transportation, Federal Highway Administration and the State of Hawaii, Department of Transportation, Interstate Route H-3, Halawa to Halekoa Interchange, Final Second Supplement to the Interstate Route H-3 Environmental Impact/4(f) Statement (1982), September 28, 1982
- U.S. Department of Transportation, Federal Highway Administration and the State of Hawaii, Department of Transportation, Interstate Route H-3, Halawa to Halekoa Interchange, Final

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Third Supplement to the Interstate Route H-3 Environmental Impact Statement (1987), October 8, 1987

U.S. Department of Transportation, Federal Highway Administration, Highway Construction Noise: Measurement, Prediction and Mitigation, 1976