
PEARL CITY DEWATERING FACILITY ■

*State of Hawaii Department of Transportation Pearl City Baseyard
Pearl City, Oahu, Hawaii*

Draft Environmental Assessment ■

FEBRUARY 2007

State of Hawaii ■
*Department of Transportation
Highways Division*

Summary Information

Project Name	Pearl City Dewatering Facility
Proposing Agency	State of Hawaii Department of Transportation Highways Division 869 Punchbowl Street Honolulu, Hawaii 96813
Project Address	State of Hawaii Department of Transportation Highways Division Pearl City Baseyard 820 2nd Street Pearl City, Hawaii 96782
Tax Map Key	None
Project Description	The Highways Division of the State of Hawaii Department of Transportation proposes to construct a dewatering facility at its Pearl City Baseyard on the island of Oahu. A dewatering facility is used to process saturated debris removed or cleaned from the State highway drainage and other structures. The highway drainage system must be periodically cleaned to prevent flooding on roadways and pollutants from affecting the quality of surface waters. Water produced from the dewatering facility is transferred directly to the City and County of Honolulu's sanitary sewer system. Once the debris reaches an acceptable level of dryness, it is removed from the facility and taken to a sanitary landfill for disposal. The Pearl City dewatering facility would consist of four settling basins and associated filter beds. It would also include dry storage areas, and a water filtering system. The entire facility would occupy approximately 30,000 square feet of the baseyard.
Required Permits	Industrial Wastewater Discharge Permit Waste Treatment Facility Permit Waiver of Zoning Development and Design Standards Special Management Area Use Permit

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CHAPTER 1

Pearl City Dewatering Facility

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CHAPTER 1

DESCRIPTION OF THE PROPOSED ACTION

1.1 Introduction

The Highways Division of the State of Hawaii Department of Transportation (HDOT Highways) prepared this Draft Environmental Assessment (EA) pursuant to Chapter 343 of the Hawaii Revised Statutes (HRS) for its proposal to construct a dewatering facility at its Pearl City Baseyard in Central Oahu, near the western edge of Pearl Harbor's Middle Loch (see [Figure 1-1](#)).

The dewatering facility would be used to process debris removed or cleaned from State highway drainage structures, which as a single system is considered a large municipal separate storm sewer system, or what is referred to as an MS4 as defined by the federal Clean Water Act (CWA) as amended. Hereinafter, this system will be referred to as the Oahu MS4, and the HDOT Highways is the owner and operator of this system.

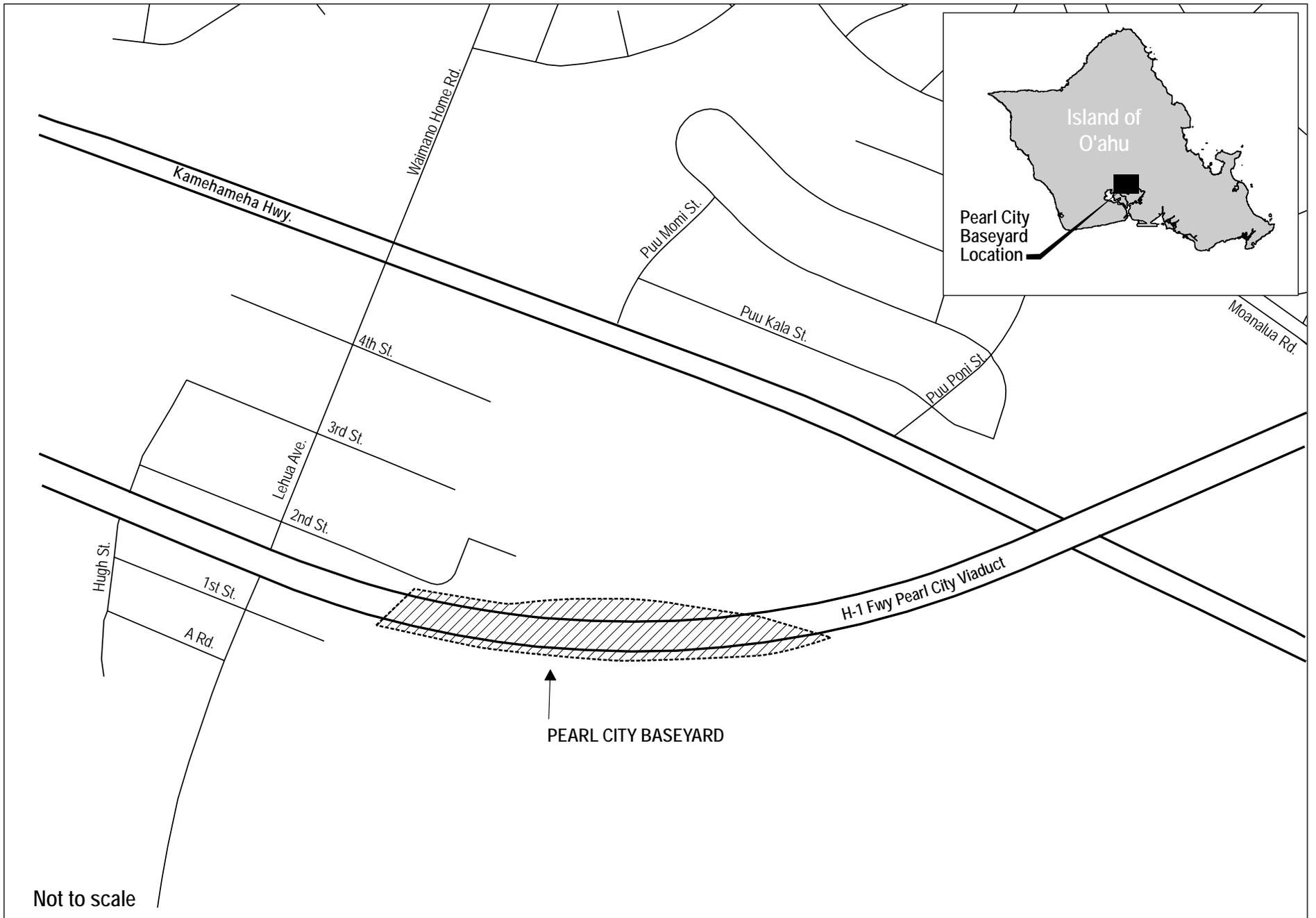
The elements of the Oahu MS4 include grated and curb inlets, catch basins¹, pipes and outfalls², which are largely hidden from public view. Open or more visible elements of the Oahu MS4 include ditches, trenches and swales. The purpose of an MS4, or any roadway drainage system, is to prevent flooding of storm water on highways, which can pose a safety hazard to motorists. Vehicles traversing through standing water are susceptible to hydroplaning, which can cause drivers to lose control. Roadways collect debris, such as sediments (e.g., soil and weathered basalt and clay), organic materials (e.g., branches and leaves) and manmade pollutants associated with automobiles (e.g., oil, grease, heavy metals, etc.) as well as from adjacent land uses (e.g., fertilizers and general trash). Storm water flows from the roadway to the drainage system result in the depositing of this debris into the Oahu MS4. Inlet catch basins are designed specifically to capture much of this debris. To ensure the effectiveness of the Oahu MS4 to control flooding, catch basins, drainage pipes and other drainage infrastructure must be periodically maintained and cleaned so that storm water passes relatively free through the system. Another reason for keeping the Oahu MS4 relatively cleared of debris is that storm water collected in the system is discharged into State waters, which include streams and ocean coastal waters. A drainage system that is clogged with debris can lead to the carrying of excess pollutants in the storm water discharged from the system, which can affect the quality of State waters.

1.1.1 Background

The operation of large MS4s, which serve populations greater than 100,000, are regulated under Phase I of the CWA, which was put into effect through storm water regulations promulgated by the U.S. Environmental Protection Agency (USEPA) in November 1990 (40 CFR 122.26). The

¹ Catch basins are connected to a grate or curb inlet and are designed to capture debris and associated pollutants that immediately enter the system from the roadway. They are normally accessible through manholes.

² Outfalls are discharge points of the storm drain system, and normally lead to a conveyance ditch or natural stream channel.



Oahu MS4 is a large MS4. The Phase I regulations required National Pollutant Discharge Elimination System (NPDES) permits for large MS4s. The CWA regulations allow State agencies to administer the NPDES permitting program within their jurisdictions, and as authorized under HRS Chapter 342D and Chapters 11-54 and 11-55 of the Hawaii Administrative Rules (HAR), the State of Hawaii Department of Health (HDOH) issued the first ever individual MS4 NPDES permit to the HDOT Highways in August 1994. The current Oahu MS4 NPDES permit was issued in February 2006, and will expire in September 2009. The permit specifies standard HDOH NPDES permit conditions, general requirements, monitoring requirements and other stipulations, one of which stated that HDOT Highways “identify and construct, if necessary, a dewatering facility for dewatering and disposal of debris removed from [the Oahu] MS4.”

As required by the Oahu MS4 NPDES permit, the HDOT Highways prepared two drafts of the *Oahu Storm Water Management Program Plan* (August 2006 and January 2007) (*Oahu SWMP Plan*). The first draft was completed in compliance with a Consent Decree dated January 30, 2006 between HDOT and HDOH. The second draft was completed in compliance with the February 2006 Oahu MS4 NPDES permit requirement that the *Oahu SWMP Plan* be available for public review and comment. The final *Oahu SWMP Plan* is scheduled to be completed by the end of March 2007. The *Oahu SWMP Plan* presents and documents the programs and activities that HDOT Highways will implement to reduce the amount of storm water containing pollutants entering and discharging from the Oahu MS4 and other HDOT Highways properties, to the maximum extent practicable. The plan specified construction of two dewatering facilities, one of which would be located at the Pearl City Baseyard. The other site would be within the Waianae Baseyard.

HDOT Highways originally planned to use a single HRS Chapter 343 environmental review process that would cover both the proposed Pearl City and Waianae Baseyard sites. However, it was later determined, after consulting with the State Historic Preservation Division, that the Waianae Baseyard site may contain native Hawaiian burial sites. Although this information did not change current plans, the environmental review process for the Waianae Baseyard site would have to include compliance with HRS Chapter 6E (Historic Preservation). This would have forced unnecessary delay to proceeding with the Pearl City Baseyard site’s environmental review process. Therefore, HDOT Highways decided to use a separate environmental review process for each site.

1.1.2 Purpose of this Document

The provisions of HRS Chapter 343 apply to the proposed action (construction of a dewatering facility at the Pearl City Baseyard) because State funds would be used for construction. In addition, the proposed action would not be exempted from environmental review as defined in HAR Section 11-200-8(a) because a dewatering facility, or similar type of facility, is not listed in HDOT’s Comprehensive Exemption List as amended on November 15, 2000.

HDOT Highways made a preliminary determination that the proposed action is not likely to have a “significant” impact as defined in HAR Section 11-200-12(b). After receipt of comments on this Draft EA, HDOT Highways will determine whether a Finding of No Significant Impact (FONSI) is appropriate.

This Draft EA discloses the environmental and social impacts that could result from the project's implementation. Additionally, this Draft EA contains a record of all comments and consultation activities that have been conducted to date as part of project planning.

1.2 Project Purpose and Need

The HDOT Highways' Debris Control Program, which is a subset of the Pollution Prevention Program that is described in detail in the *Oahu SWMP Plan*, includes procedures and practices for managing and conducting the cleaning of all highways and their associated drainage facilities (Oahu MS4). The procedures call for HDOT Highways to clean or remove polluting debris and other materials in drainage infrastructure if conditions meet certain thresholds. As noted in [Section 1.1](#), periodic cleaning of the Oahu MS4 ensures that storm water conveyance is not impeded, and that pollutant impacts to receiving waters are reduced to the maximum extent practicable. Currently, HDOT Highways contracts with private companies to clean the Oahu MS4 (hereinafter referred to as service contractors).

The Debris Control Program includes periodic inspections of all inlet catch basins and other drainage infrastructure. Depending on the amount of debris accumulation, service contractors would clean the catch basin or drainage structure inspected.

Debris removed from the Oahu MS4 is often saturated because of storm water passage through the system. Removal or cleaning of the debris within catch basins is conducted either by vacuuming using special vehicles (vac-trucks) or by manual means using buckets and other instruments. A vac-truck would include a tank for storing cleaned debris. If manual means are used to clean catch basins, storage trucks would also be required to hold the debris. Cleaning debris within open drainage infrastructure, such as swales, is conducted by manual (e.g., buckets, shovels, wheelbarrows, etc.) or mechanical (e.g., backhoe) means. Removal of debris within sections of the Oahu MS4 that is difficult to reach, such as pipes running between catch basins and outfalls, is conducted using high-pressure water hoses. All debris/waste water is then captured at an outfall and placed in a storage truck for disposal.

If an inspector suspects that a catch basin or other drainage infrastructure contains hazardous materials, the proper authorities within HDOT Highways are informed, and standard operating procedures to identify, and if necessary, remove the hazardous materials are implemented. Debris is not removed and transported for dewatering until it has been cleared free of hazardous materials.

Saturated debris removed from the Oahu MS4 is considered liquid waste, which is defined in HAR Chapter 11-58.1, *Solid Waste Management Control*. Furthermore, according to this regulation, bulk or non-containerized liquid waste may not be disposed of at a municipal solid waste landfill (landfill). In order for the debris to be suitable for landfill disposal, water must be separated from the mixture to a degree in which the debris is no longer considered liquid waste.

Currently, the service contractors are responsible for addressing the proper disposal of debris removed from the Oahu MS4. Without the benefit of having a dewatering facility, the service contractors are required to make provisions within their own facilities to air dry the material in order to separate the water from the debris. Because the Debris Control Program is in its infancy, this current treatment of debris is acceptable in the short-term. However, as the

program expands, a long-term solution is required because of the expected increase in debris volume that the service contractors would not be able to handle. The importance of having a dewatering facility was recognized by HDOH, and its construction was specified in the Oahu MS4 NPDES permit as noted in [Section 1.1.1](#).

1.3 Proposed Action

1.3.1 Layout of Dewatering Facility

The Pearl City Baseyard is located at 820 2nd Street (see [Figure 1-1](#)). The baseyard is under the H-1 Freeway Pearl City Viaduct (Pearl City Viaduct), and is accessible from Lehua Avenue, which intersects with Kamehameha Highway, a State roadway, approximately one-fourth-of-a-mile north from 2nd Street. The baseyard is rectangular-shaped with 13 sets of viaduct columns spaced approximately 100 feet apart that cut across the baseyard. [Figure 1-2](#) depicts the existing configuration and uses of the existing baseyard.

The proposed dewatering facility would be constructed between piers seven, eight and nine counting from left (west) to right (east) (see [Figure 1-3](#)). Because the facility would be completely covered by the viaduct, it would not require its own roof or other shelter, which is used to prevent drying debris from being exposed to rain water. The facility would include the following elements, which are illustrated in [Figures 1-3, 1-4, 1-5, 1-6 and 1-7](#):

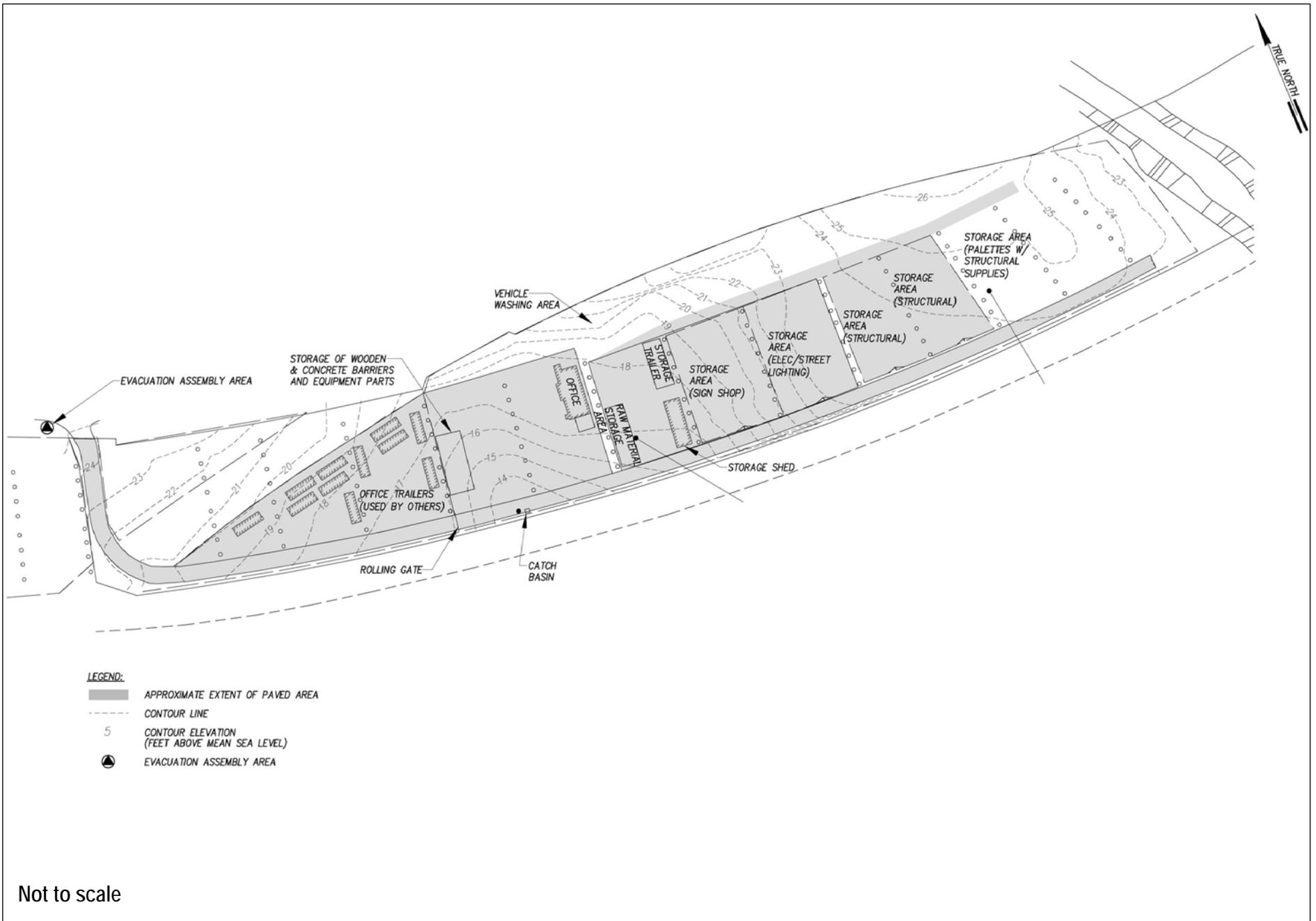
- Four settling basins;
- Four filter beds;
- Four sediment storage basins;
- Collection and transport pipes; and
- Oil-water separator.

At the dimensions shown in [Figures 1-3 and 1-4](#), the capacity of a single settling basin would be approximately 150 cubic yards or 30,000 gallons. Therefore, the entire facility would have a capacity of approximately 600 cubic yards or 120,000 gallons.

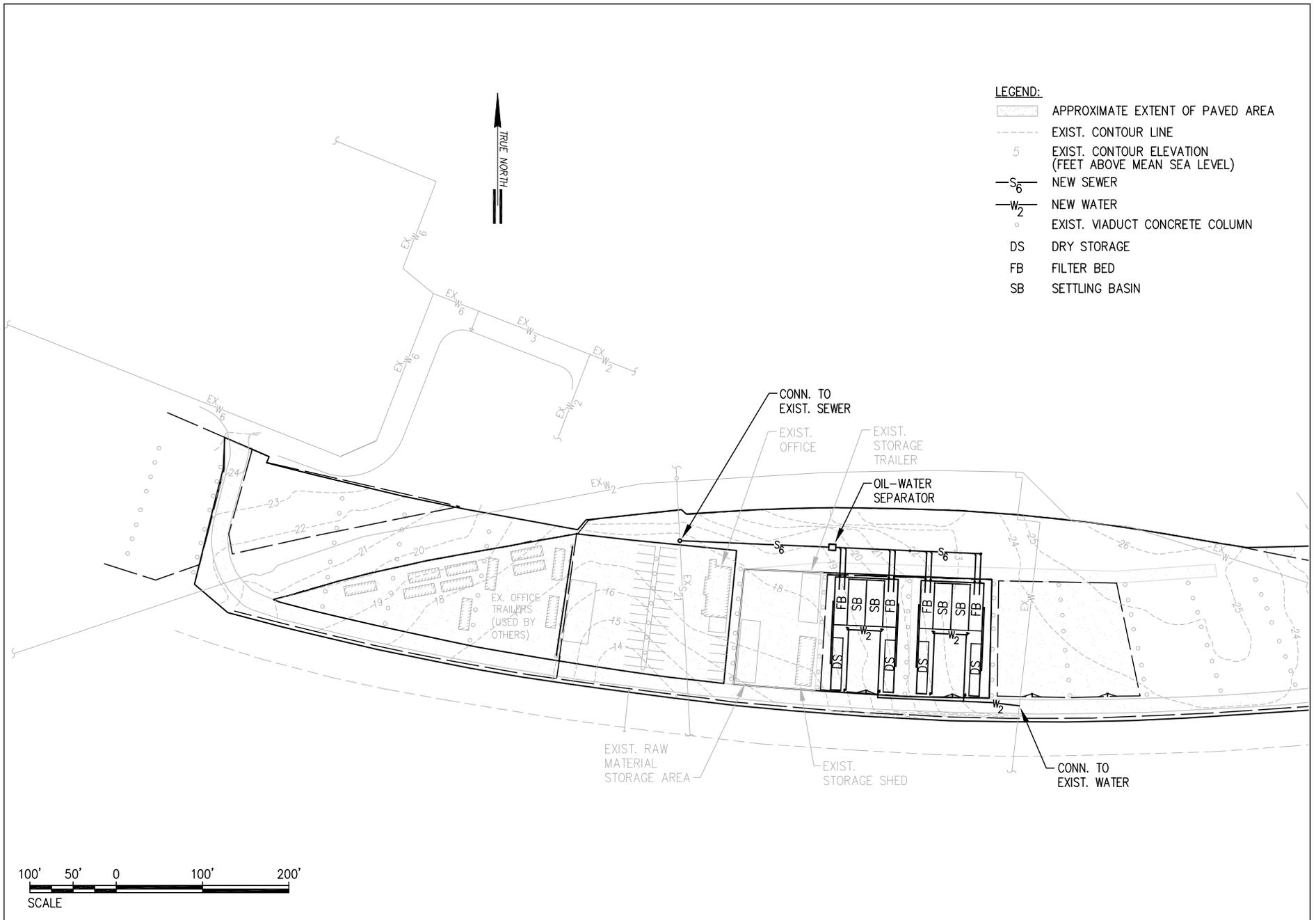
1.3.2 Dewatering Method

A settling basin is a concrete-lined area where material removed from the Oahu MS4 is dumped. The Pearl City settling basins would be constructed partially below grade, and would be accessible by truck ramps (see [Figure 1-5](#)). The vehicles, such as vac-trucks, transporting material directly to the facility, would dump the material into the settling basins using the truck ramp, and the material would be allowed to separate. A rain stop would be provided at the top of the truck ramp to prevent rainwater sheet flow from infiltrating into the basin.

A filter bed is where the water from the debris undergoes primary filtering before disposal into the municipal sewer system (see [Figure 1-6](#)). Each settling basin would have an associated filter bed. Like the settling basins, the filter beds would be constructed partially below grade, and accessible by truck ramps (see [Figure 1-6](#)). As the heavier debris drops or settles to the bottom of the settling basin, the water, which still contains high levels of sediment, is allowed to flow into the filter beds through openings between the settling basin

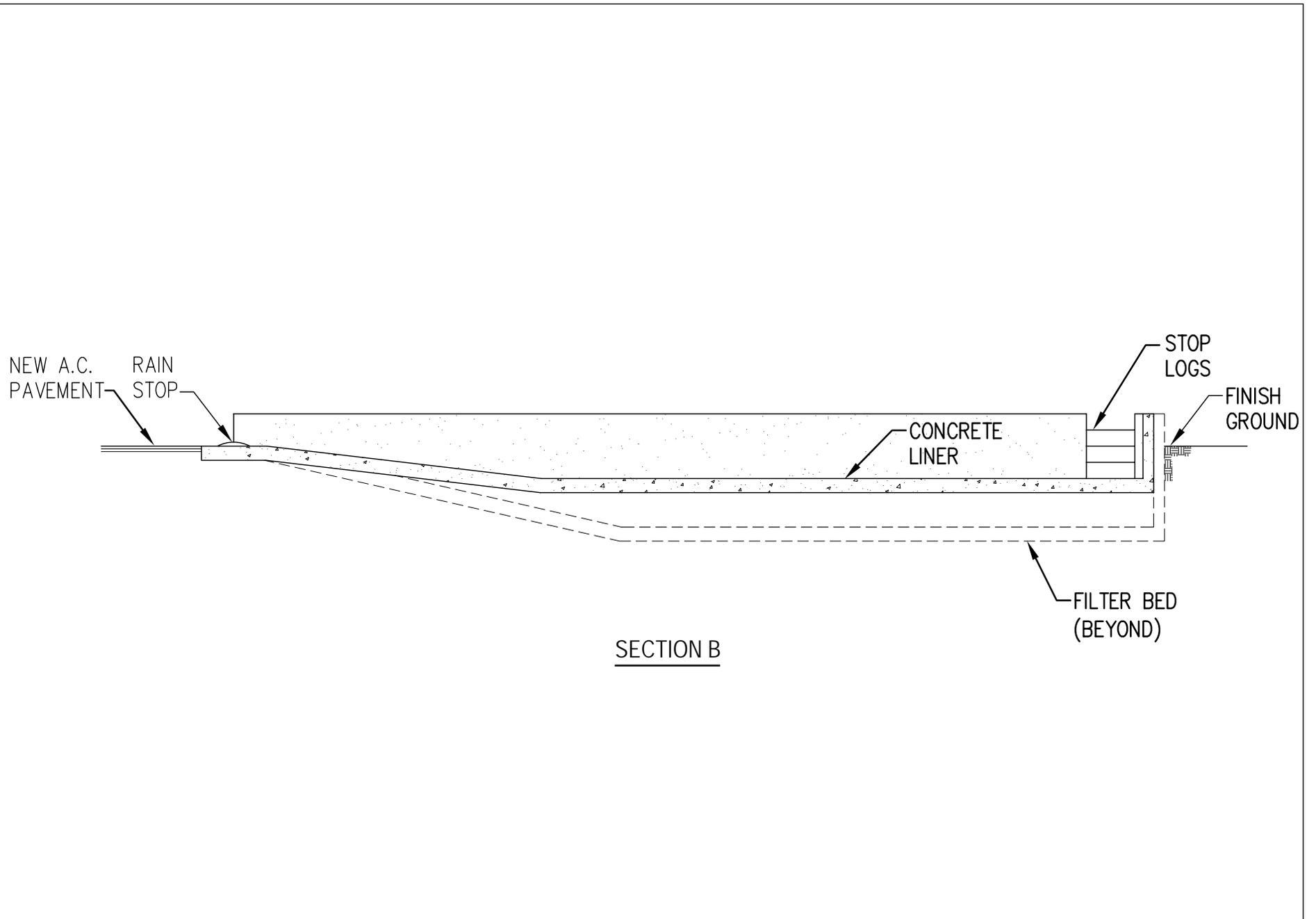


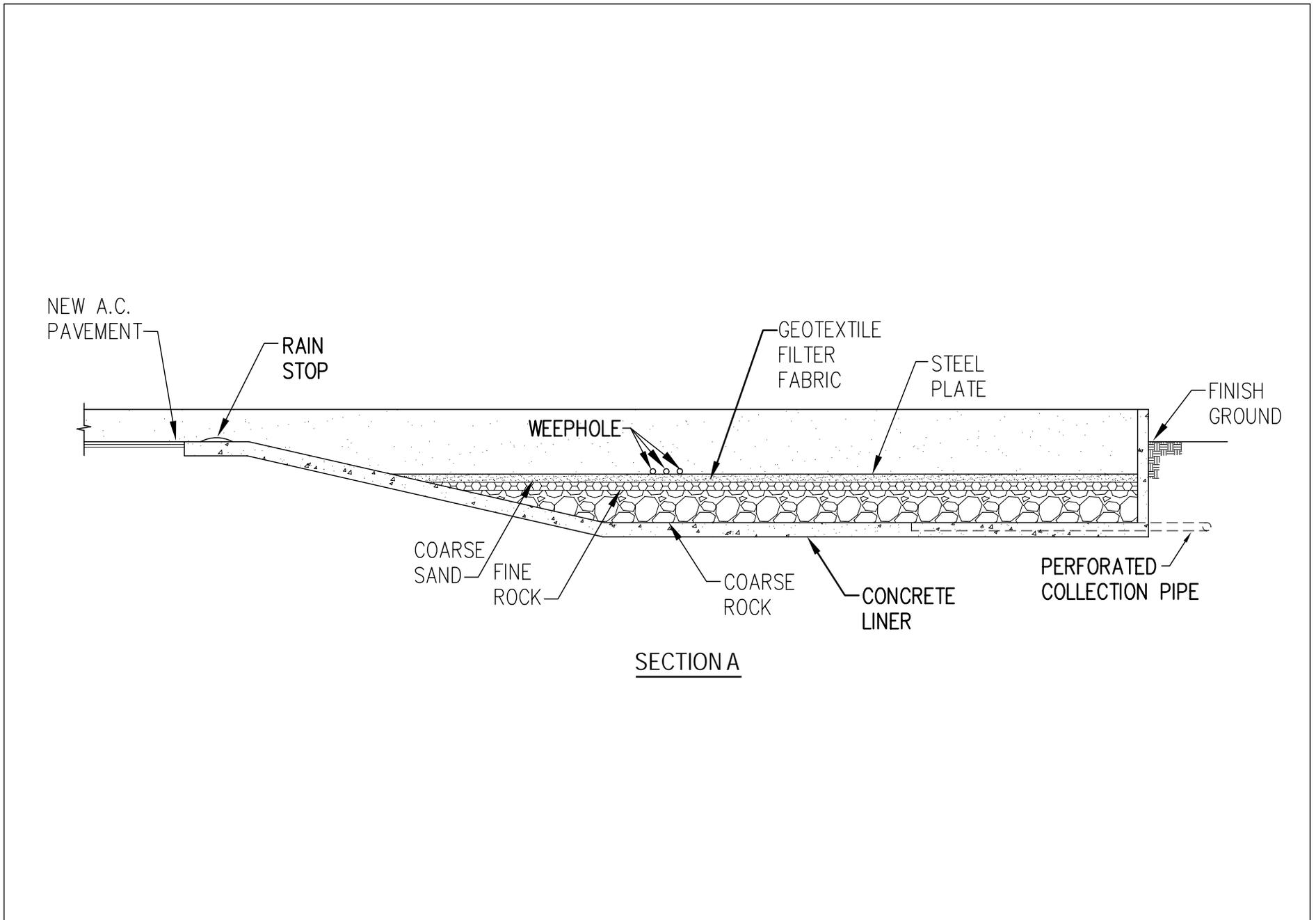
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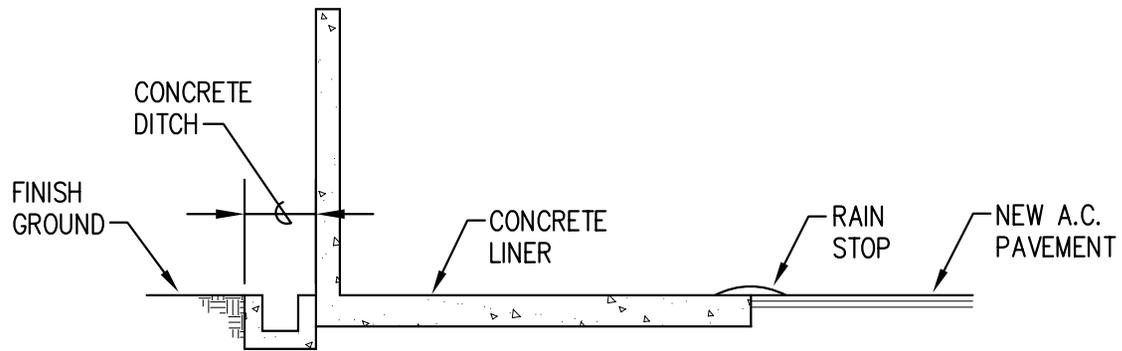


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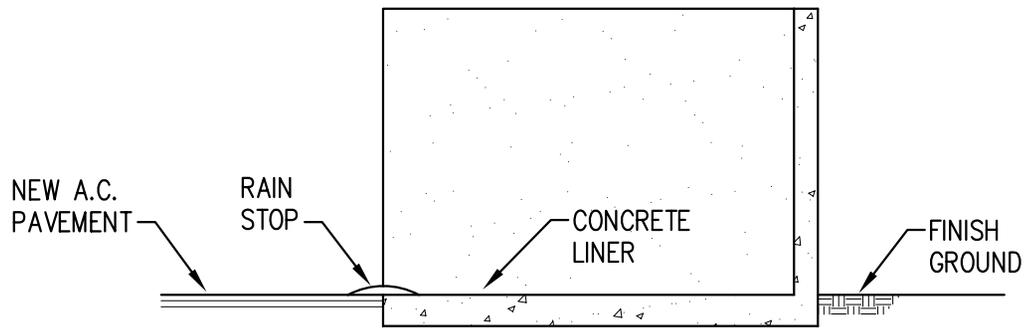
Layout of the Pearl City Baseyard Dewatering Facility
Figure 1-3







SECTION C



SECTION D

and filter bed (see [Figure 1-5](#)). The rate at which the water is allowed to flow into the filter beds is controlled by stop logs or boards placed within the gaps. Trash that floats on top of the water (e.g., Styrofoam) may be removed from either the settling basin or the filter bed.

The bottom of the filter bed contains an earthen filter composed of the following elements from the top to bottom of the filter (see [Figure 1-6](#)):

- Three-fourth-inch thick steel plate with 1 7/8-inch diameter holes, which provides a firm surface to scoop up residual solid debris;
- Six-inch layer of coarse sand;
- A geotextile filter fabric layer would be provided to prevent the coarse sand from migrating to lower layers of the filter;
- Six-inch thick layer of fine rock; and
- Two-foot layer of coarse rock.

A system of collection drainpipes would be placed below the filter to capture the water. From these pipes, the water would be directed to an oil-water separator, which would be used to remove any oily particles. The water would then be transported via pipe to an existing 21-inch sanitary sewer line owned by the City and County of Honolulu (City) that crosses the baseyard. A new manhole would be installed at this sewer connection.

The rate of dewatering would depend on the mixture of the material. A mixture with a high amount of bricks, rocks or stones would dewater at a faster rate than a mixture with a high amount of pebbles, grit or sand. Due to filtering provided by the filter bed and the oil-water separator, the water discharged from the dewatering facility would meet the requirements or standards specified in Section 14-1.9 of the *Revised Ordinances of Honolulu*. This ordinance describes what can be discharged into the municipal sewer system. Annual testing would be conducted to check if the water meets acceptable standards. A fully loaded settling basin would take between three to seven days to dry at a level acceptable for landfill disposal (five days would be typical).

In addition to producing water that would be discharged into the municipal sewer system, the dewatering process would also produce solid waste at a saturation level in which no free liquids remain in the mixture. Using the truck ramps, a rubber-tire loader would transfer the solid waste within the settling basins and filter beds onto dump trucks. The dump trucks would then transport the solid waste to a landfill for disposal. On-site temporary storage basins would be provided, as shown in [Figures 1-4 and 1-7](#), for solid waste that cannot be transported to a landfill immediately after dewatering. The storage area would be concrete-lined and built at grade.

At this time and within the foreseeable future, sanitary landfills are the only acceptable locations for disposing of the dried debris because the debris tends to contain relatively high amounts of tiny pieces of trash, which would be difficult to remove in an efficient manner. This trash makes the dried debris unsuitable for reuse or recycling.

The dewatering facility would be open or operational Monday through Friday during normal business hours (e.g., 8 am to 4 pm). The facility may have to be opened during non-business hours (e.g., at night or weekends) during emergencies, such as a storm causing a landslide that blocks a roadway or clogs storm drains.

The proposed dewatering method described above is the same method used by the City at its dewatering facilities located in Ahuimanu and Sand Island.

1.3.3 Estimated Cost and Schedule

The estimated cost of constructing the Pearl City Baseyard dewatering facility is \$3 million. Because HDOT Highways already owns the baseyard property, real estate expenditures would not be required.

Final design is tentatively scheduled to begin in late fall or early summer, and is expected to take approximately six months to complete. Construction of the dewatering facility may begin as soon as the summer 2008.

1.4 Alternatives Considered But Rejected

As an alternative to the dewatering method described in [Section 1.3.2](#), HDOT Highways could have chosen to dewater debris through evaporation. It was rejected because evaporation takes longer than filtering, and the process requires more land since the debris would have to be spread out in thinner layers to minimize evaporation time. Furthermore, an evaporation method would not have been effective at the Pearl City Baseyard because most of the property does not receive direct sunlight throughout the day.

Due to the long period of time and the expense of acquiring new property, HDOT Highways chose to explore using its own properties for the dewatering facilities. Properties owned by HDOT Highways suitable for dewatering facilities include its seven baseyards located throughout the island, and land areas underneath its viaducts. These properties were evaluated to determine if excess areas are available that can accommodate a dewatering facility, such as areas not already being used by or committed for other HDOT Highways activities, nor leased to others. Any excess areas were then checked to determine if access to municipal water and sewer systems exist. Based on these criteria, the following HDOT Highways-owned properties were eliminated from consideration:

- H-3 Freeway Tunnel Facility – This site lacks available space, has no access to a sanitary sewer system, and is located in an environmentally sensitive area.
- H-3 Freeway Viaduct in Halawa Valley – Although some of this area is presently vacant, it will likely be designated by the Halawa-Luluku H-3 Interpretive Development Plan for other uses.
- Keehi Viaduct Baseyard – Located beneath the H-1 Freeway Airport Viaduct near Keehi Interchange, this location is heavily used for highway maintenance operations, which includes the only vehicle wash rack on the island. The site is also limited by two streams that run through the parcel.
- H-1 Freeway Keehi Viaduct - Other areas of the Keehi Viaduct were explored, but none of them are viable because of inadequate space, proximity to wetlands, unfavorable soil conditions, and limited access to the sanitary sewer system.
- Kakoi Street Baseyard - This baseyard is completely utilized and no space is available for the proposed facility.
- Wahiawa Baseyard - This baseyard is less than one acre, and renovations are planned.
- Kaneohe Baseyard - This baseyard presently does not have enough excess space to accommodate the facility. In addition, the baseyard may be closed in the near future.

- Hauula Baseyard - This baseyard is less than one acre, and therefore, does not have space to accommodate the facility.
- West of Lehua Avenue beneath the Pearl City Viaduct – Due to the viaduct clearance, this site is not conducive for a dewatering facility. In addition, the site is committed to other entities.

Among HDOT Highways non-highway properties on Oahu, only the Pearl City and Waianae Baseyards were evaluated as being appropriate for a dewatering facility. Both sites would require little or no modifications to accommodate the facility. As noted in [Section 1.1.1](#), HDOT Highways intends to develop a dewatering facility at its Waianae Baseyard, and plans to prepare a separate EA for this project.

CHAPTER 2

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CHAPTER 2

AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

This chapter describes the existing environmental conditions in the study area of the proposed action. It also describes the environmental impacts that may result from constructing the Pearl City Baseyard dewatering facility.

2.1 Natural Environment

2.1.1 Geographic Setting

2.1.1.1 Existing Conditions

As shown in [Figure 1-3](#), the Pearl City Baseyard is on relatively level terrain. The elevation in the baseyard varies from a high of 26 feet above mean sea level (msl) on the northeast side of the property to a low of 14 feet msl on the south central area of the baseyard. The baseyard was graded so that storm water runoff sheet flows to the south central low point (see [Section 2.1.2](#)).

[Figure 2-1](#) shows that the underlying soils at the Pearl City Baseyard are HxA (Honouliuli clay at zero to two percent slope) and Ph (Pearl Harbor clay). According to the Natural Resources Conservation Service (NRCS), HxA is “dark reddish-brown”, “very sticky” and typically occurs in lowlands along coastal plains. Its permeability is moderately slow. Its storm water runoff is also slow, and presents only a slight erosion hazard. Pearl Harbor clay, according to NRCS, is “very dark gray” with “angular and sub-angular blocky structure.” Its permeability is slow, and because its storm water runoff is “very slow to ponded,” its erosion hazard is no more than slight.

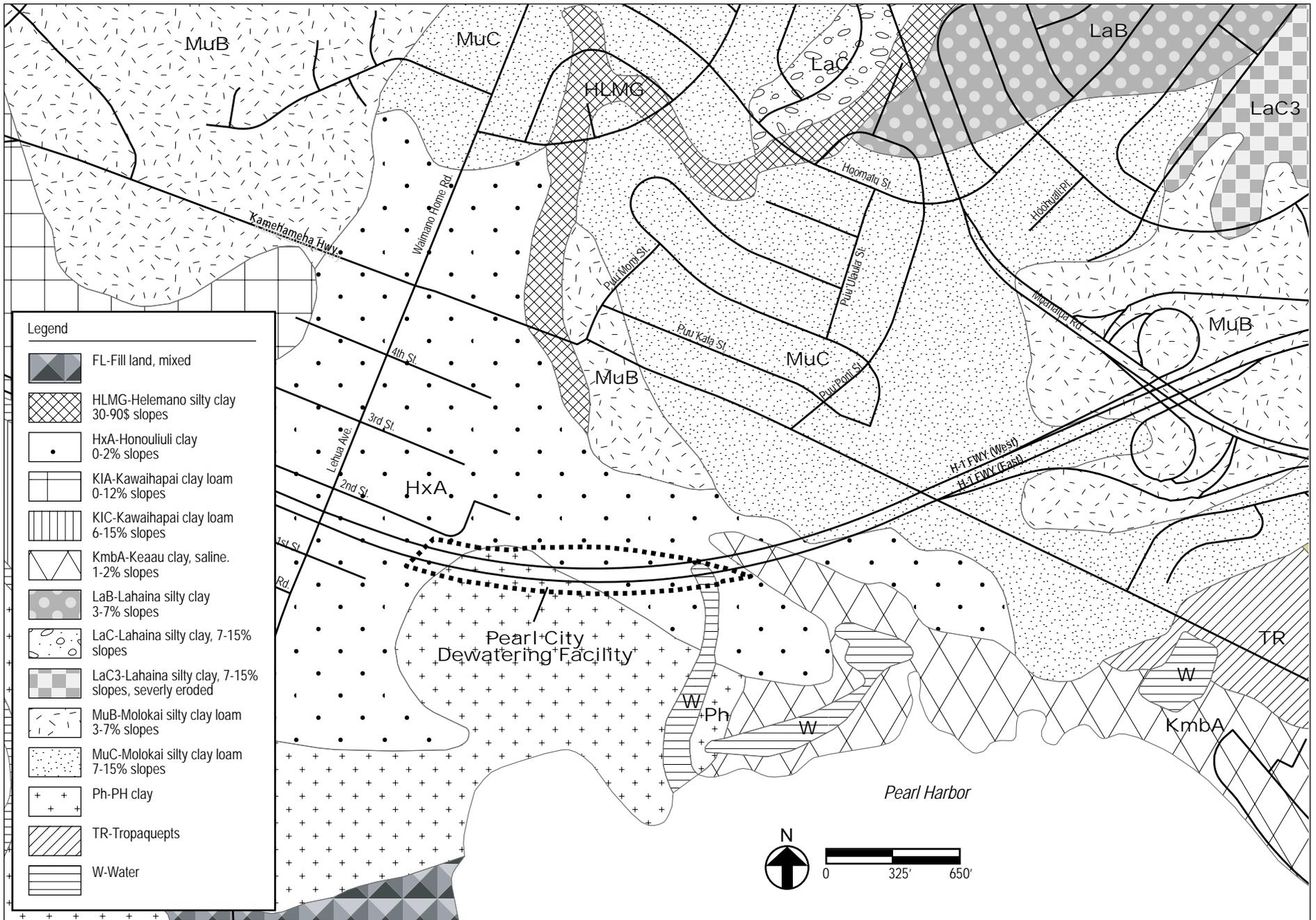
2.1.1.2 Potential Impacts

Construction of the Pearl City Baseyard dewatering facility would require excavation because the settling basins and filter beds would be constructed partially below grade and trenching would be needed to connect with existing sewer and water lines (see [Section 1.3](#)). No other substantial excavation would be required on the property, and therefore, the site’s existing topography would remain the same. Excavated material would be removed from the site. The soil conditions at the Pearl City Baseyard do not present any unusual or abnormal problems to the design and construction of the proposed action.

2.1.2 Water Resources

2.1.2.1 Existing Conditions

Although the majority of the Pearl City Baseyard is covered by viaduct, storm water runoff sheet flowing through the mostly paved baseyard originate from properties located north of the site, and from several downspouts that drain storm water from the viaduct. The grading of the baseyard causes the storm water to flow in a south/southeasterly direction. A single storm



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Soil Types at the Pearl City Baseyard
Figure 2-1

drain catch basin is located at the south central border of the baseyard, discharging into the adjacent empty field located to the south.

Waiau Gulch borders the baseyard on the west side, but only a very small percentage of the baseyard storm water discharge into this stream due to the grading described in [Section 2.1.1](#). The stream empties into Pearl Harbor's Middle Loch. Storm water discharging from the catch basin is likely to percolate within the empty field, and not directly reach Middle Loch, which is approximately 1,000 feet from the baseyard.

According to Flood Insurance Rate Maps (FIRM), the Pearl City Baseyard is outside the 100-year flood zone (see [Figures 2-2](#)).

2.1.2.2 Potential Impacts

During construction, excavation activities would expose areas of un-vegetated or unpaved soil, which could result in sedimentation and degradation of the quality of nearby water bodies described above. Based on the conceptual plan of the dewatering facility, the construction area would be slightly less than one acre. Therefore, an NPDES permit for storm water associated with construction activities would probably not be required. Nevertheless, erosion control measures or construction Best Management Practices (BMP) would be implemented during construction as required by the Oahu SWMP's Construction Site Runoff Control Program.

Because the dewatering facility would be constructed within an existing paved area of the baseyard, it would not increase the amount of impervious surfaces within the property. In addition, rain stops would be installed on the top of all ramps to the settling basins, filter beds, and sediment storage basins to prevent storm water infiltration. Therefore, the characteristics of storm water runoff through the baseyard would be the same with or without the facility.

2.1.3 Biological Resources

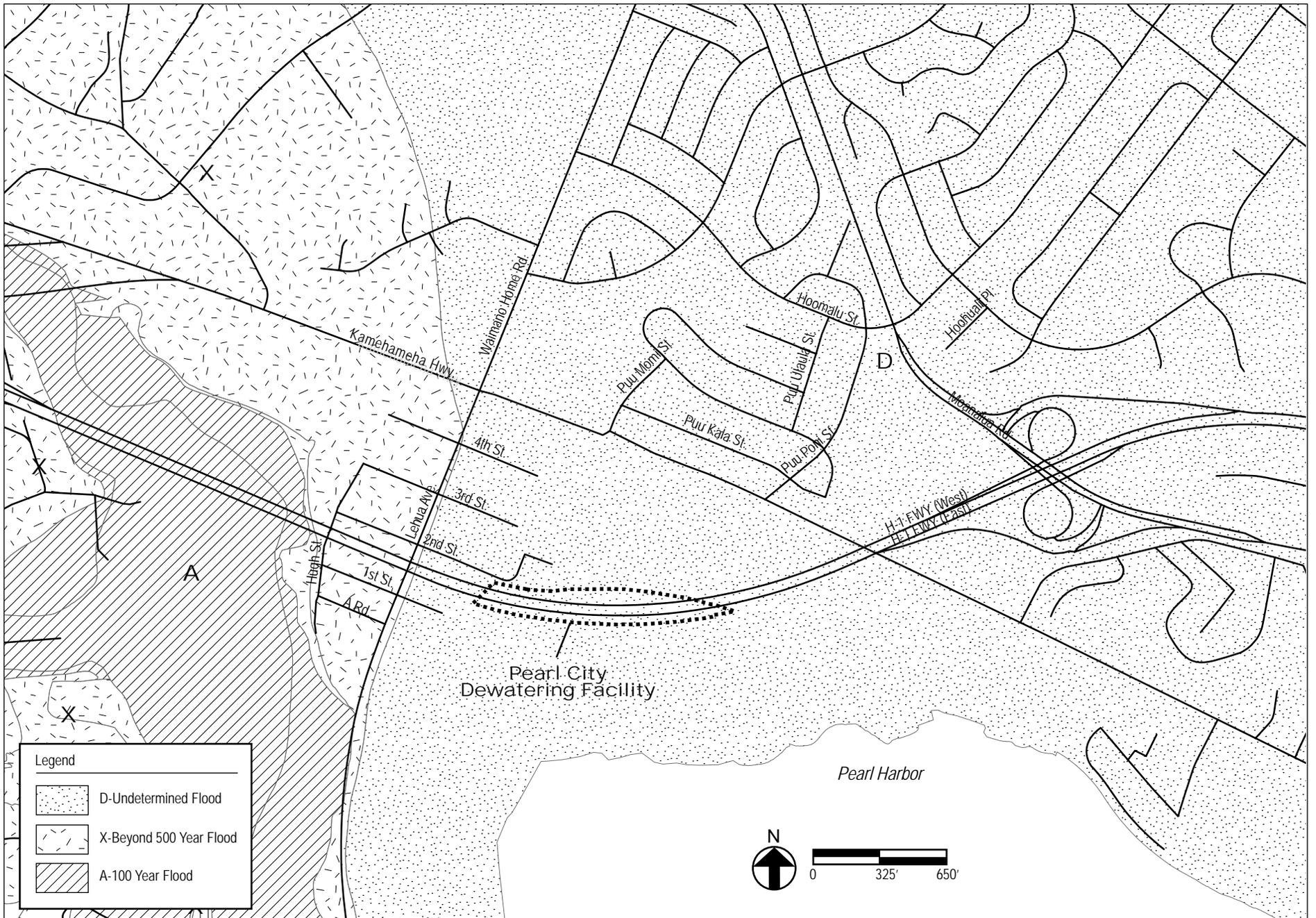
2.1.3.1 Existing Conditions

The Pearl City Baseyard has no or very little botanical value. Construction of the Pearl City Viaduct and land uses occupying the Pearl City Baseyard site prior to construction of the H-1 Freeway extensively modified the project site from its original state. The land beneath the viaduct supports no vegetation, including unpaved areas. However, a portion of the property on the north side, which is not underneath the viaduct, supports a small grassy area containing several small and medium sized trees that may support nesting of common bird species. Other faunal species likely to be found in the site would be limited to rodents and feral cats.

2.1.3.2 Potential Impacts

Construction of the Pearl City facility would not displace vegetation or landscaped areas because it would be located completely beneath the Pearl City Viaduct.

The dewatering facility would not cause mosquitoes, rats or other vermin to be attracted to the baseyard. According to the operator of the City's Ahuimanu dewatering facility (interview



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Flood Zones in the Vicinity of the Pearl City Baseyard
Figure 2-2

conducted on October 13, 2006), mosquitoes are not a problem because no standing water is produced by the dewatering process. Also, the operator noted that the drying debris, which consists mostly of sediments, does not attract rats, mice or other vermin.

2.1.4 Air Quality

2.1.4.1 Existing Conditions

Air quality throughout Oahu, including the project site, is generally good due to prevalent trade winds and on-shore breezes that help disperse most urban air pollutants. Data collected by HDOH at ten monitoring stations located throughout the island indicate that air quality on Oahu meets National and State Ambient Air Quality Standards.

2.1.4.2 Potential Impacts

Saturated debris removed from storm drains produces a musty odor because it consists mostly of soil and weathered basalt and clay. According to the operator of the City's Ahuimanu dewatering facility (October 13, 2006), the debris within the settling basin does not produce this odor during the drying process. When the debris is handled (e.g., removed from the settling basin), the underlying wetter material becomes exposed producing the musty odor, but this odor is not strong enough to be noticeable several feet from the debris. Water in the filter bed would not produce odors because it drains quickly through the filters.

2.1.5 Noise

2.1.5.1 Existing Conditions

As noted in [Section 2.2.1](#), the Pearl City Baseyard is surrounded by residences, a school and open space. The area does not support industrial or other uses that produce high noise levels. Although, the Pearl City Viaduct is directly above the baseyard, it's approximately 25 feet height over the property disperses highway-related noise away from the site and land uses immediately adjacent to the baseyard. However, vibration-related noise can be heard from within the baseyard and in areas immediately adjacent to the property.

2.1.5.2 Potential Impacts

The dewatering process does not require the use of powered equipment. Therefore, the only noise generated by the operation of the facilities would be trucks and other vehicles moving about through the baseyard. The layout of the dewatering facility provides tight vehicle circulation, which would limit the speed of these vehicles and lessen their noise generation. The loudest activity within the facility would be trucks and other vehicles reversing, which would activate warning alarms that are required by safety regulations. Nevertheless, trucks moving about the facility specifically to dump or to take dried debris away from the site to a landfill would occur infrequently during a normal work day (see [Section 2.3.1](#)). As noted in [Section 2.3.1](#), a loader would be permanently stationed at the facility. This gas-powered vehicle is substantially smaller than the trucks that transport debris to and from the facility.

2.1.6 Visual and Aesthetic Resources

2.1.6.1 Existing Conditions

The Pearl City Baseyard is not readily noticeable because of its location underneath the Pearl City Viaduct.

2.1.6.2 Potential Impacts

Even with a dewatering facility, the Pearl City Baseyard would likely remain inconspicuous from viewpoints outside the property. Because the settling basins and filter beds would be constructed partially below grade, most of these structures would only rise about three feet above the ground. The storage basins would be built at-grade and their walls would rise about eight feet above the ground. Despite these structures, the visual environment of the baseyard would still be dominated by the viaduct, such as its columns, and other buildings, such as the office trailers.

2.2 Social Environment

2.2.1 Land Use

2.2.1.1 Existing Conditions

The Pearl City Baseyard is used to store vehicles, equipment, and materials in support of the maintenance program for the State highway system on Oahu. Baseyards located in other areas of Oahu perform similar functions.

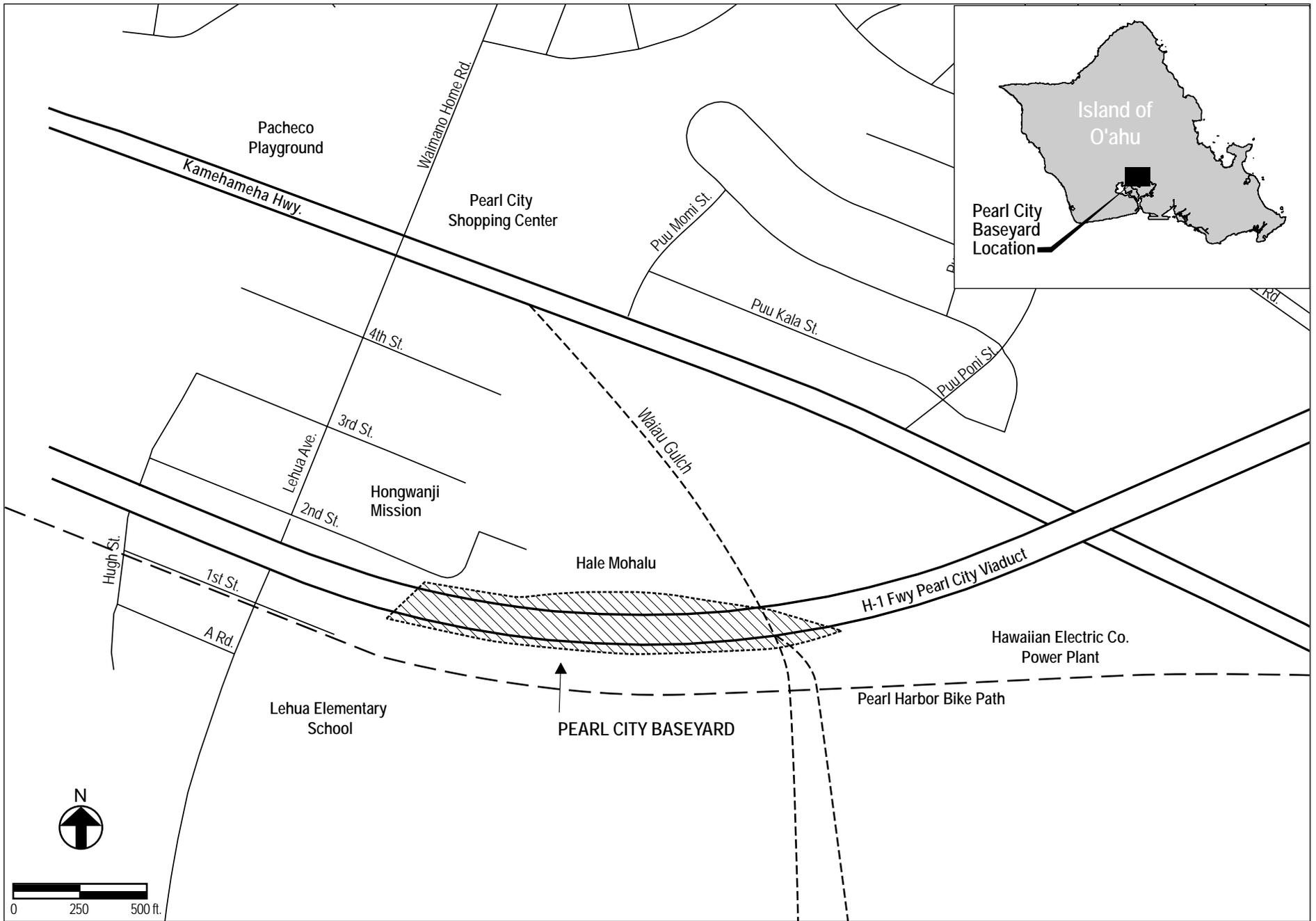
The western half of the Pearl City Baseyard is largely paved, and used primarily for offices, vehicle and equipment parking, and storage of bulk materials, such as crushed rock, sand and cold mix asphalt (see [Figure 1-2](#)). A number of office trailers on the far west side of the property are used by other non-HDOT agencies. The far eastern end of the baseyard is unpaved, and used primarily for storing chemicals, supplies, and equipment.

The baseyard is bordered by Waiiau Gulch on the west end and the Pearl City Bike Path on its south side. As shown on [Figure 2-3](#) and [Figure 2-4](#) in [Section 2.4.2.3](#), other adjacent land uses include:

- Lehua Elementary School to southwest of the baseyard; and
- Single-family residences and Hale Mohalu, a public senior housing complex, occupy most of the area north of the baseyard.

2.2.1.2 Potential Impacts

The proposed dewatering facility at the Pearl City Baseyard would permanently remove approximately 30,000 square feet from other baseyard needs. The area that would be displaced by the facility is currently used for equipment and material storage. As noted in [Section 1.4](#), the Pearl City Baseyard was chosen for this project because it has excess space to accommodate a dewatering facility. Ample room is available on the east side of the baseyard for storage. Also, dewatering is compatible with other baseyard activities.



Once completed, the dewatering facility would not influence land use decisions made by others who control adjacent properties. The surrounding parcels are built-up or occupied by land uses that would unlikely change in the future, such as Lehua Elementary School and Hale Mohalu. The only vacant parcel, on the south side of the baseyard, is owned by the State and federal governments and is zoned military preservation, which is unsuitable for development.

2.2.2 Social, Cultural and Security Conditions

2.2.2.1 Existing Conditions

For safety and security reasons, members of the general public are not allowed access into a HDOT Highways baseyard facility without permission. The Pearl City Baseyard, like other baseyards on the island, is secured by fencing and gates. The gates are locked during non-business hours, and when HDOT Highways personnel are not present on-site. The office trailers on the west side of the property, which are used by other non-HDOT agencies, are located outside the baseyard fencing. Due to the security measures, outside social or cultural activities are not conducted within the baseyard. The baseyard is used strictly for business purposes (i.e., for highways maintenance operations).

2.2.2.2 Potential Impacts

The proposed layout of the dewatering facility would not interfere with HDOT Highways maintenance personnel accessing relocated storage facilities that would likely be moved to the east side of the property. An existing internal access road that traverses through the baseyard along the southern property line would remain in place. The road provides access to all sections of the baseyard, including the site of the proposed dewatering facility and areas of the baseyard where the new storage would be located. Although the dewatering facility would generate some truck traffic (see [Section 2.3.1](#)), the amount is too small to interfere with other baseyard-related truck and vehicle traffic.

2.2.3 Historic and Archaeological Resources

2.2.3.1 Existing Conditions

Construction of the Pearl City Viaduct and other land use developments at and near the baseyard extensively modified the project site. Therefore, it is highly unlikely that the Pearl City Baseyard contains archaeological or historic resources. In a telephone conversation on October 19, 2006, the Oahu Archaeologist with the State Historic Preservation Division agreed that the site is highly unlikely to contain archaeological resources (see [Section 3.1](#)).

2.2.3.2 Potential Impacts

As noted above, construction of the dewatering facility is not expected to uncover archaeological or historic resources. If unexpected archaeological resources or human remains, which might be a native Hawaiian burial site, were uncovered during excavation activities, construction would stop and the proper authorities would be notified.

2.2.4 Recreational and Public Resources

2.2.4.1 Existing Conditions

As noted in [Section 2.2.1](#), Pearl City Baseyard is adjacent to the Pearl City Bike Path, which is part of an overall bike path that extends to the east at Aiea Bay Recreational Area near McGrew Point in Pearl Harbor and to the west in vicinity of Waipahu Depot Road in Waipahu.

2.2.4.2 Potential Impacts

The Pearl City Bike Path would be unaffected by the proposed action. As described in [Section 1.3](#), the dewatering facility would be completely within the Pearl City Baseyard property. In addition, vehicular access to the dewatering facility would be from 2nd Street, and its intersection with Lehua Avenue, which is approximately 600 feet north of where the bike path crosses this road.

2.3 Public Facilities

2.3.1 Roadways and Traffic

2.3.1.1 Existing Conditions

[Figure 1-1](#) shows the existing street network surrounding the Pearl City Baseyard. Vehicles associated with HDOT Highways maintenance operations, which also include private automobiles owned by employees, enter and exit the baseyards several times a day. Very little or no activity occurs at night or on the weekends. Vehicles associated with the baseyard access the property via 2nd Street, a minor collector street with no outlet.

2.3.1.2 Potential Impacts

Vehicular activities associated with the operation of a dewatering facility include the following:

- Vac-truck or similar vehicle delivers saturated debris from storm drains to the facility. The vehicle would back into the settling basin to unload the debris directly into one of four settling basins. A water hose would be used to remove residual wastes. Following the washing, the vehicle would immediately leave the facility.
- Rubber-tire loader transfers dried debris from the settling basin to the storage area, and scrapes the bottom of the filter beds to remove residual wastes. The hop-toe also transfers the dried debris from the settling basin and dry storage area onto dump trucks. The loader is stationed at the facility.
- Dump truck transfers dried debris from the dewatering facility to a landfill.

Between six and eight vac-trucks or similar vehicles are anticipated to deliver debris to the proposed dewatering facility per day or during the hours of operation (see [Section 1.3.2](#)). A dump truck would service the facility approximately once a week.

The vac- and dump vehicles would enter the baseyard in the same manner as other maintenance-related trucks and vehicles. Due to the relatively small number of vehicles associated with the dewatering facility, the increase in vehicular traffic at the baseyard entrance on 2nd Street would be difficult to notice.

2.3.2 Utilities and Infrastructure

2.3.2.1 Existing Conditions

The Pearl City Baseyard has access to or is serviced by sanitary sewer, water, electrical and telephone lines.

2.3.2.2 Potential Impacts

The utility requirements of the dewatering facility would include water, sewer and electricity. Telephone service would not be required to operate the dewatering facility (telephones are available in the baseyard offices). The facility would tap into an existing water line running across the baseyard on the eastern half of the property (see [Figure 1-3](#)). As described in [Section 1.3.2](#), the sewer connection would be made to an existing 21-inch line. The electrical requirements and quantities of potable water entering and water leaving the dewatering facility would not be high enough to overtax or overload the capacities of the systems. Water exiting the dewatering facility would be treated at the City's Honouliuli Waste Water Treatment Plant in Ewa, Oahu.

The dewatering facility would require an industrial wastewater discharge permit, which is administered by the City's Department of Environmental Services (ENV), and a transfer station facility or waste treatment facility permit from HDOH. ENV requires annual testing or monitoring of water discharges. However, according to ENV staff, more frequent testing may be required initially, which would be reduced to annual testing if no problems arise.

2.4 Consistency with Government Plans, Policies, and Controls

2.4.1 State of Hawaii Plans and Controls

2.4.1.1 Hawaii State Plan

The *Hawaii State Plan* (June 1991), as codified in HRS Chapter 226, serves as a guide for the future long-range development of the State. It consists of comprehensive goals, objectives and policies for determining priorities and allocating resources. The State Plan promotes the growth and diversification of the State's economy, the protection of the physical environment, the provision of public facilities, and the promotion of and assistance to socio-cultural advancement.

The proposed action would support the State Plan's land, air, and water quality objectives and policies as set forth in HRS Section §226-13. Development of the dewatering facilities would be part of the Oahu SWMP Pollution Prevention Program (see [Section 1.1.1](#)), which addresses the need to improve the quality of the State's water resources through proper maintenance activities, such as periodic cleaning of the Oahu MS4, and public education to disseminate information about how the improper use of drainage infrastructure can adversely affect water quality.

2.4.1.2 Hawaii State Land Use Controls

The State Land Use Commission (SLUC), under the authority granted in HRS Chapter 205, regulates land use through classification of State lands into four districts: Urban, Agriculture, Conservation and Rural. The intent of the land classification is to accommodate growth and development while retaining the natural and agricultural resources of the State. Each district has specific land use objectives and development constraints. The least restrictive of the State classifications is Urban, and lands classified as Urban are under the jurisdiction of the counties. The Pearl City Baseyard is in the State Urban area.

2.4.2 City and County of Honolulu Plans and Controls

2.4.2.1 General Plan

The *General Plan of the City and County of Honolulu* (1992) is a statement of long-range social, economic, environmental and design objectives for the island of Oahu. It also includes policies to meet these objectives.

The proposed action would address the *General Plan* objective of meeting “the needs of the people of Oahu for an . . . environmentally sound systems of waste disposal” by providing a “safe, efficient, and environmentally sensitive waste-collection and waste-disposal” method of dealing with debris removed from the Oahu MS4.

2.4.2.2 Primary Urban Center Development Plan

Due to changes made to the City Charter in 1992, the City Department of Planning and Permitting began to prepare conceptual plans for the eight planning areas on Oahu. Previous plans included parcel specific details. The Pearl City Baseyard is located in the Primary Urban Center (PUC) planning area. Because the *General Plan* directed high percentages of projected population and employment growth to the PUC, it is one of two planning areas subject to “development plans” (the other was the Ewa planning area). The other six planning areas were designated for modest population and job growth. “Sustainable community plans” were prepared for these areas, which focused on maintaining and improving existing communities and the special qualities of each region.

The PUC Development Plan was adopted by the City Council on June 21, 2004. The planning area extends from Pearl City in the west to Waialae-Kahala in the east, and contains almost half the island’s population and three-quarters of Oahu’s jobs. The plan contains an overall vision for the year 2025, and establishes a set of policies to shape growth and development. As noted above, the PUC is anticipated to accommodate a large percentage of population and economic growth on the island. Therefore, public infrastructure, such as the proposed Pearl City Baseyard dewatering facility, to support this growth would be an appropriate land use within the PUC.

2.4.2.3 City and County of Honolulu Zoning

The City Department of Planning and Permitting (DPP) regulates land use on State Urban classified land and certain State Agriculture classified land on Oahu in accordance with zoning, as specified in official zoning maps, and the Land Use Ordinance (LUO). Zoning maps and the LUO are used to encourage orderly development in accordance with adopted

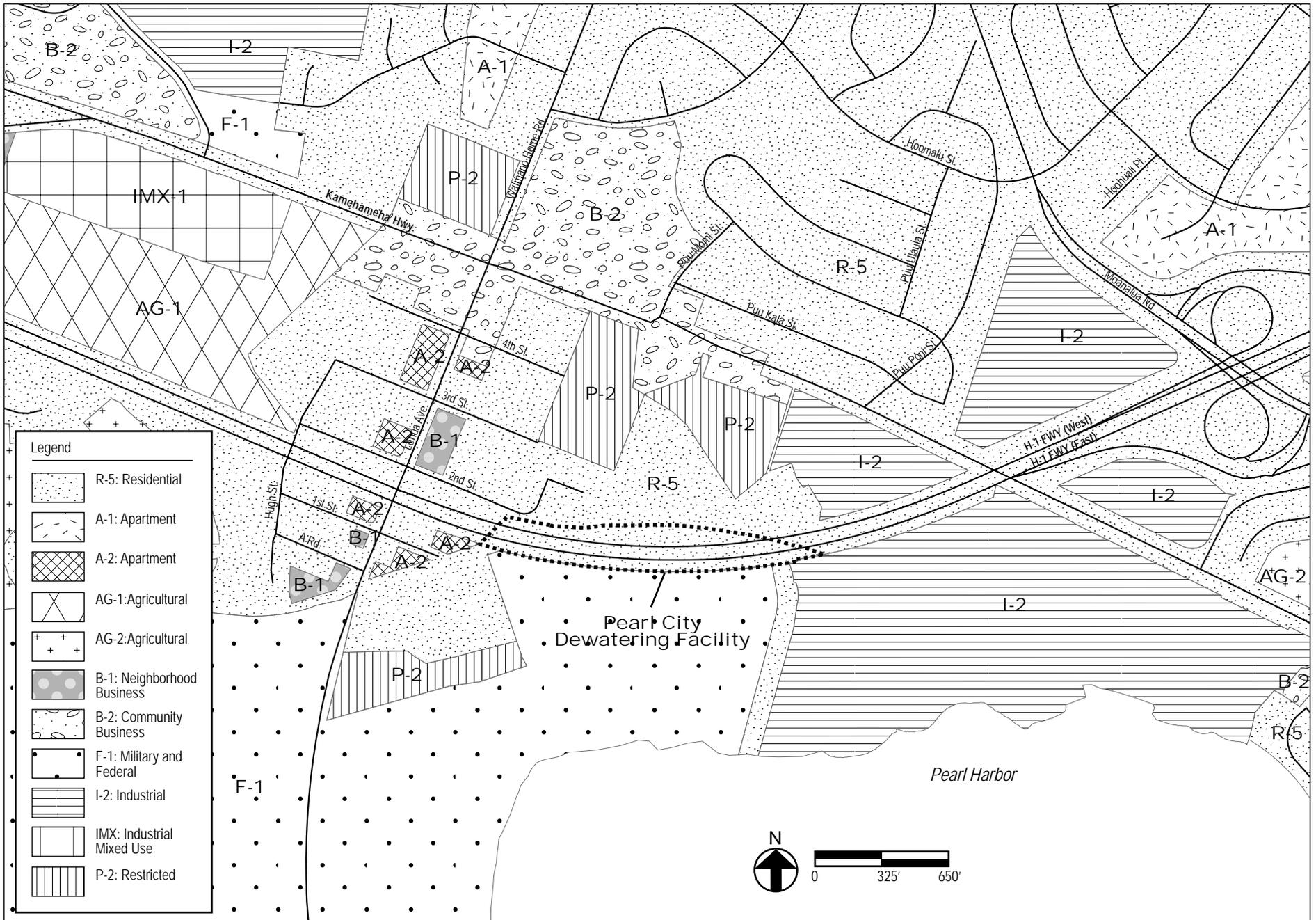
land use policies, such as the Oahu General Plan and development plans or sustainable community plans, and to promote and protect public health, safety, and welfare.

As shown on [Figure 2-4](#), the area occupied by Pearl City Baseyard is zoned R-5 (Residential District). Areas to the north and west of the baseyard, including the property occupied by Lehua Elementary School, are also zone R-5. Some parcels along Lehua Avenue are zoned for apartments and neighborhood businesses. The baseyard would likely never be used for residential purposes because the property is needed by HDOT Highways for roadway maintenance activities and because it is not appropriate for residential development. According to the LUO, the proposed Pearl City Baseyard dewatering facility would be considered a “public use and/or structure” as defined in Article 10. Therefore, strict application of development and design standards may be waived (Section 21-2.130(a)(1)). An application for a permit waiver would be submitted to the DPP for approval.

2.4.2.4 Special Management Area

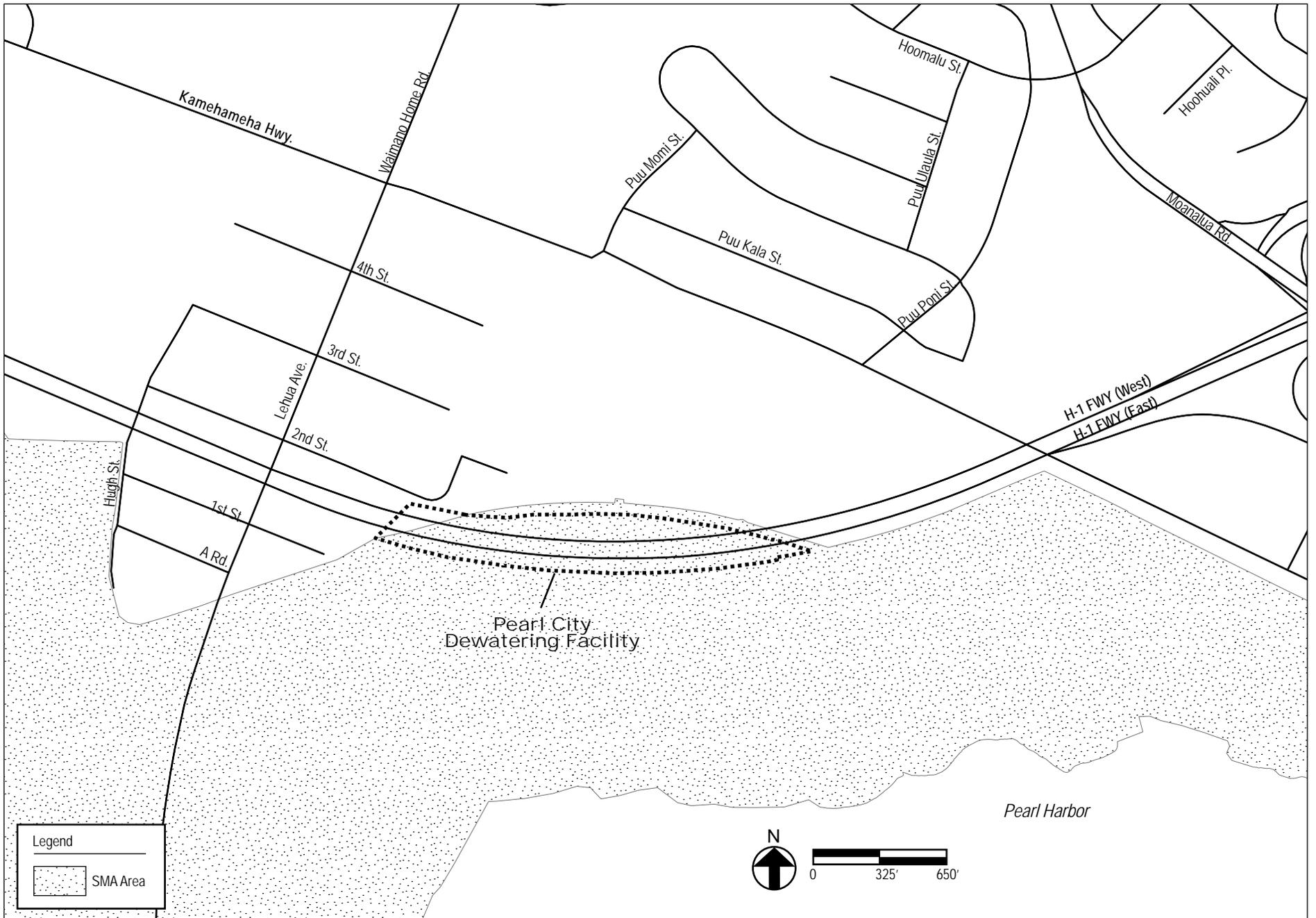
The Hawaii Coastal Zone Management program designated the areas along the shoreline for “special controls on developments to avoid permanent losses of valuable resources and the foreclosure of management options, and to ensure that adequate access, by dedication or other means, to publicly owned or used beaches, recreation areas, and natural reserves is provided.” [HRS Section §205A-21] To accomplish these objectives, HRS Chapter 205A established the Special Management Area (SMA), and authorized the counties to develop and administer permitting systems to control development within the SMA. The SMA is a regulated zone extending inland from the shoreline to a landward boundary delineated by the counties. DPP administers the SMA use permit program on Oahu.

As shown on [Figure 2-5](#), the proposed dewatering facility within the Pearl City Baseyard would be within the SMA. A dewatering facility would be considered a “development”, as defined in Chapter 25 of the Revised Ordinances of Honolulu. Therefore, construction of the dewatering facility would be subject to permitting under the SMA program.



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Existing Zoning in the Vicinity of the Pearl City Baseyard
Figure 2-4



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Special Management Area in the Vicinity of the Pearl City Baseyard
Figure 2-5

CHAPTER 3

Pearl City Dewatering Facility

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CHAPTER 3

COMMENTS AND COORDINATION

3.1 Agency and Stakeholder Consultation

The following agencies and organizations were contacted by letter (see Appendix) and asked if they were aware of any environmental or social issue associated with the proposed action, or if they had any environmental concerns:

- State of Hawaii Agencies
 - Department of Education*
 - Department of Health, Environmental Health Administration*
 - Department of Land and Natural Resources (DLNR), Division of Forestry and Wildlife*
 - DLNR Land Division
 - DLNR State Historic Preservation Division
 - Office of Environmental Quality Control*
 - Office of Hawaiian Affairs*
- City and County of Honolulu Agencies
 - Department of Design and Construction*
 - Department of Environmental Services*
 - Department of Facility Maintenance*
 - Department of Parks and Recreation
 - Department Planning and Permitting
 - Honolulu Fire Department*
 - Honolulu Police Department*
- Elected Officials
 - Honorable Colleen Hanabusa, State Senator 21st District*
 - Honorable Gary H. Okino, City Councilmember, District VIII*
- Neighborhood Boards
 - Pearl City Neighborhood Board, No. 21
 - Waianae Coast Neighborhood Board, No. 24

An asterisk appears next to those entities that responded to the letter, and copies of their response letters are provided in the Appendix. Note that at the time the letters were sent, HDOT Highways was planning a single environmental review process that would cover proposed dewatering facilities at both the Pearl City and Waianae Baseyards. Therefore, some of the comments are not relevant to the proposed action at the Pearl City Baseyard.

As noted above, the State Historic Preservation Division (SHPD) did not respond to the letter. However, since SHPD staff is concerned about possible archaeological or burial issues associated with the Waianae Baseyard site, direct contact was made with the Oahu archaeologist by telephone on October 19, 2006 and a meeting was held on November 28, 2006.

3.2 Public Meetings and Other Outreach Activities

The following public informational meetings/activities were held to explain the project and solicit questions and comments from the community:

- May 22, 2006, Manana Recreation Center;
- November 27, 2006, Manana Recreation Center; and
- December 14, 2006, site visit to the City's Ahuimanu Dewatering Facility.

In addition, project staff attended Pearl City Neighborhood Board committee and full board meetings on the following dates for project presentations and to be available for questions and comments:

- September 19, 2006;
- October 17, 2006;
- October 24, 2006; and
- November 28, 2006.

Finally, project staff conducted individual meetings with the following individuals or entities who requested contact to voice their concerns about the proposed facility:

- Ms. Fay Toyama, Principal of Lehua Elementary School, October 10, 2006;
- Board of Education, October 25, 2006; and
- Reverend Murakami and members of the Pearl City Hongwanji, November 27, 2006.

CHAPTER 4

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CHAPTER 4

ANTICIPATED FINDING OF NO SIGNIFICANT IMPACT

In accordance with the Hawaii Revised Statutes (HRS) Chapter 343 HRS and Hawaii Administrative Rules (HAR), Sections 11-200-9 and 11-200-11.2, HDOT, as the approving agency, anticipates rendering a Finding of No Significant Impact (FONSI) for the proposed action. This assessment is based on an evaluation of project impacts in relation to the “Significance Criteria” specified in HAR 11-200-12(b). The Significance Criteria appear below in italics, followed by a discussion of the project in relation to the specific criterion. The nature of the project’s potential impacts is discussed in detail in Chapter Two.

Involves an irrevocable commitment to loss or destruction of any natural or cultural resource – The area that would be directly affected by construction of the proposed dewatering facility does not contain important natural or cultural resources (see [Sections 2.1.3 and 2.2.3](#)).

Curtails the beneficial uses of the environment – Because the Pearl City Baseyard has a specific function related to the maintenance of the highway system on Oahu, it has limited uses. Keeping the area proposed for the dewatering facility free of any other land use would neither benefit nor be of detriment to the environment.

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 dewatering facility is consistent with the environmental goals and objectives of the State of Hawaii (see [Section 2.4.1.1](#)).

Substantially affects the economic or social welfare of the community or State – The use of the Pearl City Baseyard for dewatering debris removed from storm water drainage system would not adversely affect the economic or social well-being of the community or State because as State-owned properties used for highway maintenance, this property is unlikely to be used for business or social purposes.

Substantially affects public health – The debris removed from storm drains consists mostly of saturated sediments, organic materials, trash and roadway-related pollutants. If handled properly, it does not pose a public health risk. Using a facility as described in [Section 1.3](#), is a proper method of handling saturated debris removed from storm drains. All storm drain catch basins and other infrastructure are inspected prior to cleaning. If an inspector encounters something that appears to be hazardous, proper HDOT Highways authorities would be notified. The clean-up crew would not remove any material from a storm drain that is suspected of containing hazardous materials. HDOT Highways has standard operating procedures for removing or cleaning hazardous materials.

Involves substantial secondary impacts - The proposed dewatering facility would not be expected to cause secondary impacts because its development would not factor in the land use decisions of landowners controlling adjacent and nearby properties (see [Section 2.2.1](#)) or require HDOT Highways or other entities to commit to other actions at or near the proposed site.

Involves substantial degradation of environmental quality - The proposed dewatering facilities would not affect environmental quality. The baseyard is not located in an environmentally sensitive area.

Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions – The proposed dewatering facility in the Pearl City Baseyard would have individual functional utility. Although HDOT Highways is planning to construct a dewatering facility at its Waianae Baseyard for the same reasons for choosing the Pearl City Baseyard site, the decision to proceed with the Waianae site would not be influenced by whether or not HDOT Highways chooses to proceed with the Pearl City site. In other words, moving ahead with or constructing the Pearl City Baseyard dewatering facility would not commit HDOT Highways to construct the proposed Waianae Baseyard facility. In addition, if the Waianae facility were constructed along with the Pearl City site, both sites are sufficiently separated by distance that their combined impacts would not cumulatively affect any particular environmental or social resource. Both sites would, however, contribute water and solid waste to the City's waste water treatment plants and landfills, respectively. In comparison to the total amount of water and solid waste produced on the island, the combined quantities would be miniscule.

Substantially affects a rare, threatened or endangered species, or its habitat – The Pearl City Baseyard does not contain rare, threatened or endangered plant or animal species (see [Section 2.1.3](#)).

Detrimentially affects air or water quality or ambient noise levels – Debris removed from storm drains may have a slight musty odor. Based on experiences at the City dewatering facilities, once the debris is within the settling basins, it would not produce odors, except if it is handled, which may expose the underlying wetter material, but this odor would not be strong enough to be noticeable outside of the facility (see [Section 2.1.4](#)). The settling basins, filter beds and storage basins would include rain stops to prevent storm water passage through the debris (see [Section 1.3.2](#)). Therefore, the characteristics of storm water runoff through the baseyards would be the same with or without the facility (see [Section 2.1.2](#)). Dewatering does not require powered equipment. Although heavy vehicles and a smaller rubber-tire loader would move about the facility, the tight circulation areas provided for the movement of vehicles and the small number of vehicles associated with the operation of the facilities would limit noise generation (see [Section 2.1.5](#)).

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 - The Pearl City Baseyard is not located in an environmentally sensitive area (see above).

Substantially affects scenic vistas and viewplanes identified in county or state plans or studies – The dewatering facility would not affect scenic vistas or important viewsheds. It would be located underneath the Pearl City Viaduct, and would not be noticeable apart from other baseyard structures or activities (see [Section 2.1.6](#)).

Requires substantial energy consumption – Because the dewatering process does not require electrical or other energy sources, the dewatering facility requires only a small amount of electrical power. Gas-powered vehicles used to transport wastes to, from and

within the facility would be needed. Energy consumption of these vehicles would not be excessive or substantial.

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CHAPTER 5

Pearl City Dewatering Facility

Draft Environmental Assessment

CHAPTER 5 REFERENCES

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Flood Insurance Rate Map

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State of Hawaii Department of Transportation, Highways Division, Oahu Storm Water Management Program Plan, January 2007.

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State of Hawaii, Hawaii Revised Statutes, as amended

U.S. Geographic Survey website <<http://hi.water.usgs.gov>>

United States Department of Agriculture Soil Conservation Service in Cooperation with the University of Hawaii Agricultural Experiment Station, Soil Survey of Islands of Kauai, Oahu, Maui, Molokai and Lanai, State of Hawaii, August 1972

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APPENDIX

Pearl City Dewatering Facility

Draft Environmental Assessment



**Parsons
Brinckerhoff
Quade &
Douglas, Inc.** American Savings Bank Tower
1001 Bishop Street, Suite 2400
Honolulu, HI 96813
808-531-7034
Fax: 808-528-2388



August 17, 2006

PLEASE SEE ATTACHED LIST OF RECIPIENTS

Subject: State of Hawaii Department of Transportation
Proposal to Construct Two Dewatering Facilities,
Pearl City and Waianae Baseyards, Oahu, Hawaii

The Highways Division of the State of Hawaii Department of Transportation (HDOT) is proposing to construct two dewatering facilities on the island of Oahu as part of its Oahu Storm Water Management Program (SWMP). Parsons Brinckerhoff (PB) was hired as the master consultant by HDOT Highways Division to assist in the development and implementation of the Oahu SWMP.

The dewatering facilities will be used to dry debris that has been removed or cleaned from highway storm drains. This debris primarily consists of sediments, organic materials (e.g., tree branches and leaves) and litter, which cannot be disposed of at an approved landfill until properly dried. The facilities are planned to be located within two Highways Division baseyards: Pearl City and Waianae (see enclosed maps). No additional property would be acquired by HDOT for this project. Pearl City Baseyard (820 2nd Street, Pearl City) is located underneath the Pearl City H-1 Viaduct, and is accessible from Lehua Avenue (see enclosed Map A). Waianae Baseyard (85-630 Farrington Highway, Waianae) is directly accessible from Farrington Highway, and is adjacent to Waianae Intermediate School (see enclosed Map B). Both baseyards are used to park or store vehicles, equipment and materials needed for highway maintenance. The two baseyards were selected because they have sufficient and suitable open areas to accommodate the facilities.

The planned dewatering facilities will consist of concrete-lined truck ramps and settling basins where storm drain debris is unloaded and allowed to settle. Water from the settling basins is allowed to flow away from the settling basins, and is then filtered prior to discharge into the City's municipal sewer system. The City's dewatering facilities, located in Ahuimanu and on Sand Island, operate in a similar manner.

August 17, 2006
Page 2

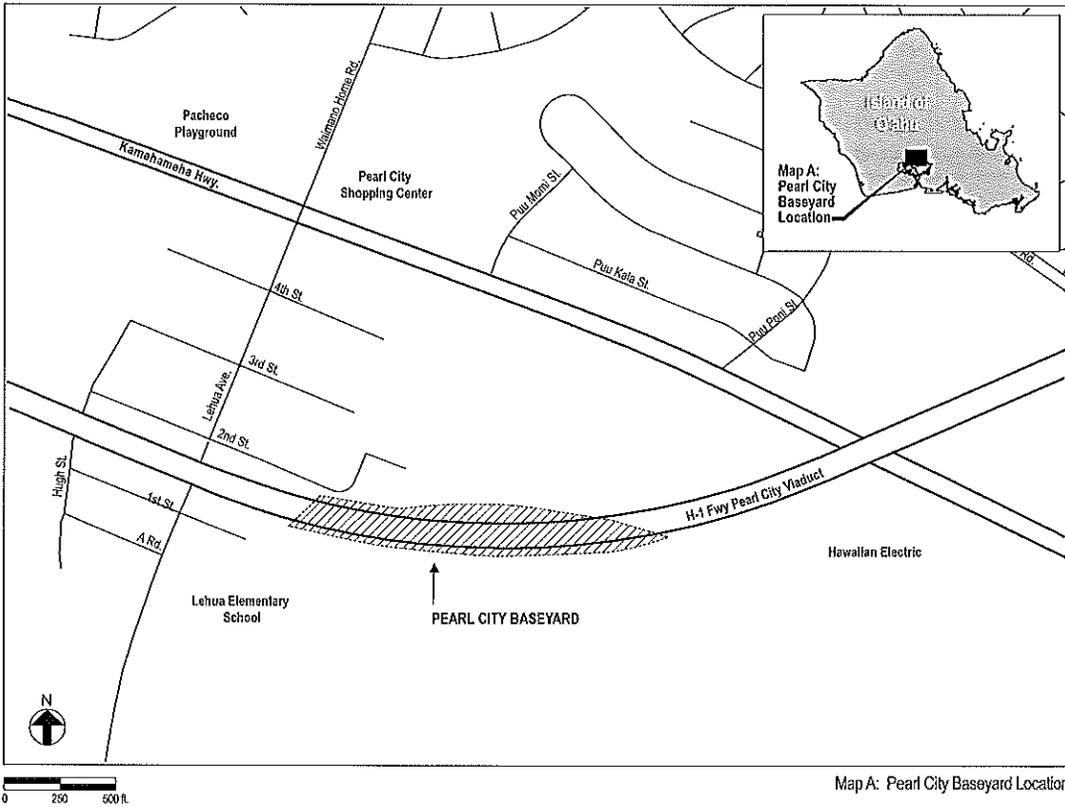
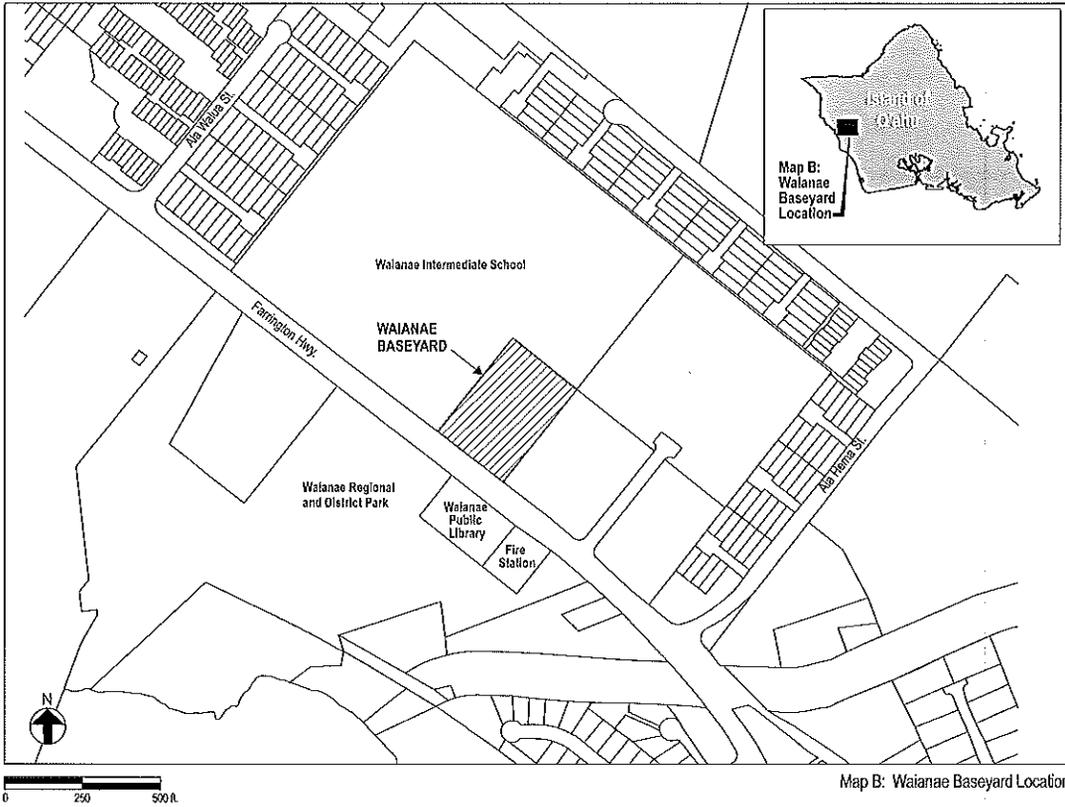
As the Oahu SWMP master consultant, PB will assist HDOT Highways Division in preparing a State environmental assessment (EA) of the dewatering facilities planned within the Pearl City and Waianae Baseyards. If you have knowledge of any operational, environmental or social issue associated with the project at one or both locations, we would very much appreciate this information by September 18, 2006. It will assist us in preparing the EA.

If you have any questions, please call me at 566-2246.

Sincerely yours,
Parsons Brinckerhoff Quade & Douglas, Inc.

Larissa Sato, P.E.
Deputy Program Manager

Enclosures: Map A: Pearl City Baseyard Location
Map B: Waianae Baseyard Location



**Pearl City and Waianae Baseyard
Proposed Dewatering Facilities
Environmental Scoping Letter
List of Recipients**

*Ms. Patricia Hamamoto, Superintendent
State of Hawaii Department of Education
P.O. Box 2360
Honolulu, Hawaii 96804

*Mr. Laurence K. Lau, Esq., Deputy
Director
State of Hawaii Department of Health
Environmental Health Administration
1250 Punchbowl Street
Honolulu, Hawaii 96813

*Mr. Paul Conry, Administrator
State of Hawaii
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, Hawaii 96813

Mr. Russell Tsuji, Administrator
State of Hawaii
Department of Land and Natural Resources
Land Division
1151 Punchbowl Street, Room 220
Honolulu, Hawaii 96813

Ms. Melanie Chinen, Administrator
State of Hawaii
Department of Land and Natural Resources
State Historic Preservation Division
601 Kamokila Blvd., Room 555
Kapolei, Hawaii 96707

*Ms. Genevieve Salmonson, Director
State of Hawaii
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

*Mr. Clyde Namuo, Administrator
State of Hawaii
Office of Hawaiian Affairs
711 Kapiolani Boulevard, Suite 500
Honolulu, Hawaii 96813

*Mr. Eugene C. Lee, Director
City and County of Honolulu
Department of Design and Construction
650 S. King Street
Honolulu, Hawaii 96813

*Mr. Eric Takamura, Director
City and County of Honolulu
Department of Environmental Services
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707

*Ms. Laverne Higa, P.E., Director
City and County of Honolulu
Department of Facility Maintenance
1000 Uluohia Street, Suite 215
Kapolei, Hawaii 96707

Mr. Henry Eng, Director
City and County of Honolulu
Department Planning and Permitting
650 S. King Street
Honolulu, Hawaii 96813

*Mr. Kenneth G. Silva, Chief
City and County of Honolulu
Fire Department
3375 Koapaka Street
Honolulu, Hawaii 96819

*Mr. Boisse Correa, Chief
City and County of Honolulu
Police Department
801 S. Beretania Street
Honolulu, Hawaii 96813

Mr. Albert Fukushima, Chair
Pearl City Neighborhood Board, No. 21
1841 Palamoi Street
Pearl City, Hawaii 96782

Ms. Cynthia K.L. Rezentes, Chair
Waianae Coast Neighborhood Board, No.
24
87-149 Maipela Street
Waianae, HI 96792

Mr. Lester K.C. Chang, Director*
City and County of Honolulu
Department of Parks and Recreation
1000 Uluohia Street, Suite 309
Kapolei, HI 96707

The Honorable Maile Shimabukuro*
45th Representative District
Hawaii State Capitol, Room 315
415 South Beretania Street
Honolulu, HI 96813

The Honorable Mark Takai*
34th Representative District
Hawaii State Capitol, Room 403
415 South Beretania Street
Honolulu, HI 96813

The Honorable Clarence K. Nishihara*
18th Senatorial District
Hawaii State Capitol, Room 208
415 South Beretania Street
Honolulu, HI 96813

The Honorable Colleen Hanabusa
Hawaii State Capitol, Room 214
415 South Beretania Street
Honolulu, HI 96813

City Councilmember Todd K. Apo*
530 South King Street, Room 202
Honolulu, HI 96813

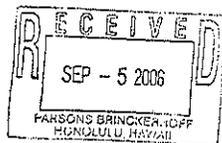
City Councilmember Gary Okino
530 South King Street, Room 202
Honolulu, HI 96813

*Sent in separate mailing on September 14,
2006.

*Responded to scoping letter.



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2500
HONOLULU, HAWAII 96804



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OFFICE OF THE SUPERINTENDENT

September 1, 2006

Ms. Larissa Sato, Deputy Program Manager
Parsons Brinckerhoff Quade and Douglas, Inc.
American Savings Bank Tower
1001 Bishop Street, Suite 2400
Honolulu, Hawaii 96813

Dear Ms. Sato:

Subject: Proposed Pearl City and Waianae Baseyard Dewatering Facilities

The Department of Education (DOE) requests that the environmental assessments of the two dewatering facilities indicate the distance of the proposed facilities from the nearest classrooms at Lehua Elementary and Waianae Intermediate schools and the prevailing wind patterns.

The potential noise, dust, smell, insect, animal, and traffic impacts of the facilities on the students at those schools should also be addressed. A clear description of the process of dewatering, including the estimated frequency of use of these sites, the estimated number of trucks or truck trips that are expected to bring the waste to the site, the hours of operation, and whether the material being dewatered could include dead animals, fish, or hazardous waste also should be discussed.

Finally, we request information on what security measures will be undertaken to ensure that unauthorized people will not enter the site. Once we have a clearer idea of how the sites will operate, we will be able to comment on the potential impacts to the schools. We would appreciate identifying any additional issues or concerns that might be raised by others in the affected communities.

Thank you for this opportunity to raise our preliminary concerns. Should you have any questions, please call Heidi Meeker of the Facilities Development Branch at 733-4862.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Patricia Hamamoto".

Patricia Hamamoto
Superintendent

PH:jmb

c: Randolph Moore, Acting Assistant Superintendent, OBS
Duane Kashiwai, Public Works Manager, FDB
Mamo Carreira, CAS, Campbell/Kapolei/Waianae Complex Areas
Keith Hayashi, CAS, Nanakuli/Pearl City/Waipahu Complex Areas

LINDA LINGLE
GOVERNOR OF HAWAII



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

September 13, 2006

Ms. Larissa Sato, P.E.
Parsons Brinckerhoff Quade & Douglas, Inc.
American Savings Bank Tower
1001 Bishop Street, Suite 2400
Honolulu, Hawaii 96813

Dear Ms. Sato:

SUBJECT: State of Hawaii Department of Transportation
Proposal to Construct Two Dewatering Facilities at Pearl City and Waiānae
Baseyards, Oahu, Hawaii

Thank you for allowing us to review and comment on the subject document dated August 17, 2006. The document was routed to the various branches of the Environmental Health Administration. We have the following Clean Water Branch (CWB) and Solid and Hazardous Waste Branch (SHWB) comments.

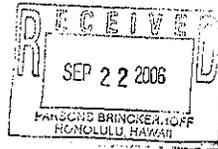
Clean Water Branch

The two (2) dewatering facilities are part of the Oahu Storm Water Management Program which is required by the National Pollutant Discharge Elimination System (NPDES) Permit issued to the Department of Transportation (DOT) Highway Division (HWYS) Municipal Separate Sewer System (MS4), Permit No. HI S000001. The dewatering facility effluent is "filtered prior to discharge into the City's municipal sewer system." The CWB has reviewed the limited information contained in the document and offers the following comments:

1. The dewatering facilities will be located within the Pearl City and Waiānae Baseyards. The discharge of storm water associated with industrial activities at these and other DOT-HWYS baseyards will be covered by Part D.1.f(4) – Maintenance Facilities Best Management Practices Program Plan of the DOT-HWYS MS4 Permit No. HI S000001. There is no discharge of process wastewater (dewatering facility effluent) to State waters.
2. A Notice of Intent (NOI) to be covered by an NPDES general permit shall be submitted at least 30 days before the commencement of the construction activity if the construction of the dewatering facilities, including clearing, grading, and excavation, results in the disturbance of

CHYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
EPO-06-147



Ms. Sato
September 13, 2006
Page 2

equal to or greater than one (1) acre of total land area (Hawaii Administrative Rules [HAR], Chapter 11-55, Appendix C). The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a large common plan of development or sale. **An NPDES permit is required before the commencement of the construction activities.** The NOI form may be picked up at our office or download from our website at:
<http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html>.

3. In accordance with HAR, Section 11-55-38, the applicant for an NPDES permit is required to either submit a copy of the new NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the DOH that the project, activity, or site covered by the NOI or application has been or is being reviewed by SHPD. If applicable, please submit a copy of the request for review by SHPD or SHPD's determination letter for the project.
4. Any discharge related to project construction or operation activities, with or without an NPDES permit coverage, shall comply with the applicable State Water Quality Standards as specified in HAR, Chapter 11-54.

Hawaii Revised Statutes, Subsection 342D-50(a), requires that "[n]o person, including any public body, shall discharge any water pollutants into state waters, or cause or allow any water pollutant to enter state waters except in compliance with this chapter, rules adopted pursuant to this chapter, or a permit or variance issued by the director."

If you have any questions, please contact Ms. Joanna L. Seto of the Engineering Section, CWB at 586-4309.

Solid and Hazardous Waste Branch

Based on your letter dated August 17, 2006, we understand that the two proposed dewatering facilities will consist of concrete lined settling basins such that both the solid and liquid portions of highway debris will not be deposited directly onto the ground. From the concrete settling basins the liquids portion will be disposed via the City and County of Honolulu's sewer system while the solids will be disposed of at a landfill.

We recommend that the green waste portion, if significant, be segregated from the dry debris and taken to a DOH permitted composting facility, with the remaining portion taken to a DOH permitted landfill.

If the remaining portion contains a significant amount of soil, we further recommend that the Department of Transportation consider testing the soil so that it may be reused instead of being disposed.

Ms. Sato
September 13, 2006
Page 3

If you have any questions, please contact Mr. Lane Otsu of the Solid Waste Section, SHWB at 586-4226.

We strongly recommend that you review all of the Standard Comments on our website: www.state.hi.us/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this project should be adhered to.

If there are any questions about these comments please contact Jiakai Liu with the Environmental Planning Office at 586-4346.

Sincerely,



KELVIN H. SUNADA, MANAGER
Environmental Planning Office

c: EPO
CWB
SHWB

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LINDA LINGLE
GOVERNOR OF HAWAII



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

August 23, 2006

PETER Y. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
ROBERT K. MASUDA
VICEDIRECTOR
OCEAN NAKANO, Acting
DEPUTY DIRECTOR FOR
THE COMMISSION ON
WATER RESOURCE MANAGEMENT

AGRICULTURE
BOTANICAL AND OCEANIC RESEARCH
CONSERVATION OF WATER RESOURCES
MANAGEMENT
CONSERVATION AND COASTAL LANDS
OCCUPATION AND
RESOURCES MANAGEMENT
OCCUPATION
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
HONOLULU ISLAND RESERVE
COMMISSION
LAND MANAGEMENT
STATE PLANTS

Ms. Larissa Sato, P.E.
Deputy Program Manager
Parsons Brinckerhoff Quade
And Douglas, Inc.
American Savings Bank Tower
1001 Bishop Street, Suite 2400
Honolulu, Hawaii 96813



Dear Ms. Sato:

Subject: Request for Comments: State of Hawaii Department of
Transportation, Proposal to Construct Two Dewatering Facilities at
Pearl City and Waianae Baseyards, Oahu, Hawaii.

We appreciate the opportunity to comment on your subject request.
Department of Land and Natural Resources, Division of Forestry and Wildlife has
no objections to your proposed dewatering facilities at Pearl City and Waianae
baseyards as it will not impact any of our management programs. No further
consultation is needed from DOFAW. Thank you for the opportunity to comment
on your project.

Sincerely yours,

Paul J. Conry
Administrator

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

255 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE: (808) 586-4185
FACSIMILE: (808) 586-4186
E-mail: oeqc@hawaii.state.hi.us

GENEVIEVE SALMONSON
DIRECTOR



Ms. Larissa Sato
Parsons Brinckerhoff Quade & Douglas, Inc.
American Savings Bank Tower
1001 Bishop Street, #2400
Honolulu, HI 96813

Subject: Pre-consultation for Proposal to Construct Two
Dewatering Facilities, Pearl City & Waianae Baseyards

Dear Ms. Sato:

We have received your letter dated August 17, 2006 about the construction of two
dewatering facilities at the Pearl City & Waianae DOT baseyards.

Please explain how the department will assure that hazardous waste will be separated
from the nonhazardous waste.

We have no further comments to offer at this time, but will reserve comments when the
documents are submitted. Thank you for the opportunity to review your request and
should you have any questions, please feel free to call our office at 586-4185.

Sincerely,

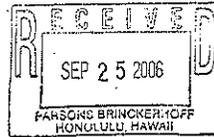
Genevieve Salmonson
Director

PHONE (808) 594-1888

FAX (808) 594-1885



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



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HRD06/2678

September 11, 2006

Larissa Sato
Parsons Brinckerhoff Quade & Douglas, Inc.
American Savings Bank Tower
1001 Bishop Street, Suite 2400
Honolulu, HI 96813

RE: State DOT Proposal to Construct Two Dewatering Facilities, Pearl City Baseyard (820 2nd Street) and Wai'anae Baseyard (85-630 Farrington Highway), O'ahu Island.

Dear Ms. Sato,

The Office of Hawaiian Affairs (OHA) is in receipt of your August 23, 2006 submission and offers the following comments:

Our staff recommends that the environmental assessment (EA) you are preparing include a professional "due diligence" study of the potential impact of these projects on archaeological, historic, and cultural resources. We also recommend contacting Alike Silva, William Ailā, and Alice Greenwood regarding the Wai'anae project in order to improve the consultation component of your EA.

OHA further requests your assurances that if these project go forward, should iwi or Native Hawaiian cultural or traditional deposits be found during ground disturbance, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Thank you for the opportunity to comment. If you have further questions or concerns, please contact Jesse Yorck, Native Rights Policy Advocate, at (808) 594-0239 or jessey@oha.org.

Aloha,

A handwritten signature in black ink, appearing to read "Clyde W. Nāmu'o".

Clyde W. Nāmu'o
Administrator

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 523-4564 • Fax: (808) 523-4567
Web site: www.honolulu.gov

MUJI HANNEMANN
MAYOR

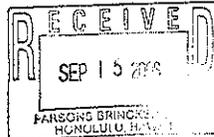


EUGENE C. LEE, P.E.
DIRECTOR

CRAIG I. NISHIMURA, P.E.
DEPUTY DIRECTOR

September 13, 2006

Ms. Larissa Sato, P.E.
Deputy Program Manager
Parsons, Brinckerhoff, Quade & Douglas, Inc.
1001 Bishop Street, Suite 2400
Honolulu, Hawaii 96813



Dear Ms. Sato:

Subject: State of Hawaii Department of Transportation
Proposal to Construct Two Dewatering Facilities
Pearl City and Waianae Baseyards, Oahu, Hawaii

Thank you for giving us the opportunity to comment on the above proposed facility.

The Department of Design and Construction has the following comments:

- A sewer connection application should be obtained from the Department of Planning and Permitting, Site Development Division.
- The environmental assessment should address the spillover effects of the sights, sounds, and odors of the operations to the adjoining land users. The debris, litter, and organic matter being collected and dewatered may emit harmful or obnoxious gases; the use of equipment may create loud sounds disturbing to neighboring properties; and the operations may be considered unsightly to neighbors and passers-by. We are interested in knowing how you plan to address these issues.
- Impact of dewatering operations on the street traffic in the immediate area.
- Request that you submit to us the draft environmental assessment for the project when it is published and submitted to the Office of Environmental and Quality Control (OEQC).

Ms. Larissa Sato, P.E.
Page 2
September 13, 2006

Should you have any questions, please call Craig Nishimura, Deputy Director,
at 523-4716.

Very truly yours,

Eugene C. Lee, P.E.
Director

ECL:it (169426)

c: DDC Wastewater Division
DDC Facilities Division

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
 1000 ULUKOHA STREET, SUITE 308, KAPOLEI, HI 96707
 TELEPHONE: (808) 692-5159 FAX: (808) 692-5113 WEBSITE: <http://www.cc.honolulu.gov>

MUFI HANNEMANN
 Mayor



ERIC S. TAKAMURA, Ph.D., P.E.
 Director

KENNETH A. SHIMIZU
 Deputy Director

PRO 06-048

September 18, 2006

VIA FACSIMILE: 808-528-2368

Larissa Sato, P.E., Deputy Program Manager
 Parsons Brinckerhoff Quade & Douglas, Inc.
 American Savings Bank Tower
 1001 Bishop Street, Suite 2400
 Honolulu, Hawaii 96813

Dear Ms. Sato:

Subject: State of Hawaii Department of Transportation
 Proposal to Construct Two Dewatering Facilities,
 Pearl City and Waianae Baseyards, Oahu, Hawaii

We received a copy of your subject pre-consultation letter of August 17, 2006 addressed to Mr. Eugene Lee, Director of the City's Department of Design and Construction. We have reviewed your letter and have the following comments for your consideration in the preparation of the draft environmental assessment:

- If any storm water from any portion of the site discharges to the City's Municipal Separate Storm Sewer System (MS4), the drainage plan needs to include provisions, including structural Best Management Plans, to reduce pollutants prior to discharge.
- An industrial wastewater discharge permit from our department's Regulatory Control (RC) Branch, Division of Environmental Quality, is needed for the treated effluent that will be discharged to the City's wastewater system. Check with the RC Branch for requirements, which will include water quality monitoring. Note that storm water runoff is not allowed to be discharged to the City's wastewater system.
- Check with our department's Refuse Division on whether dewatered material will be accepted at the Waimanalo Gulch Landfill, or if another disposal method will be required.

Thank you for the opportunity to comment and we look forward to reviewing the subject project's draft environmental assessment. Should you have any questions, please call me at 692-5727.

Sincerely,

Jack Pobuk
 CIP Program Coordinator

cc: DDC

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 ULUKOHA STREET, SUITE 215, KAPOLEI, HAWAII 96707
 Phone: (808) 692-5054 Fax: (808) 692-5957
 Website: www.honolulu.gov

MUFI HANNEMANN
 Mayor



LAVERNE HIGA, P.E.
 DIRECTOR AND CHIEF ENGINEER
 GEORGE "KEOKI" MIYAMOTO
 DEPUTY DIRECTOR

IN REPLY REFER TO:
 06-

September 6, 2006

Ms. Larissa Sato, P.E.
 Parsons Brinckerhoff Quade & Douglas, Inc.
 American Savings Bank Tower
 1001 Bishop Street, Suite 2400
 Honolulu, Hawaii 96813

Dear Ms. Sato:

Subject: State of Hawaii Department of Transportation (DOT)
 Proposal to Construct Two Dewatering Facilities
 Pearl City and Waianae Baseyards, Oahu, Hawaii

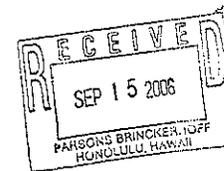
This is in response to your August 17, 2006 letter requesting comments on the proposed construction by the State of Hawaii of two dewatering facilities at the subject State DOT baseyards.

We have experienced no problems with the operations of our dewatering facilities at the Ahulimanu and Sand Island treatment plants and have no additional comments to make at this time.

Should you have any questions, please call Tyler Sugihara, Assistant Chief of the Division of Road Maintenance, at 484-7600.

Very truly yours,

LAVERNE HIGA, P.E.
 Director and Chief Engineer



HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

636 SOUTH STREET • HONOLULU, HAWAII 96813
TELEPHONE: (808) 723-7139 • FAX: (808) 723-7111 • INTERNET: www.honolulufire.org

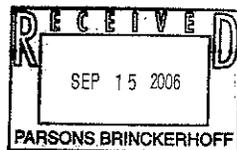
MUFI HANNEMANN
MAYOR



KENNETH G. SILVA
FIRE CHIEF

ALVIN N. TOSITA
DEPUTY FIRE CHIEF

September 12, 2006



Ms. Larissa Sato, P.E.
Deputy Program Manager
Parsons Brinckerhoff Quade & Douglas, Inc.
Suite 2400, American Savings Bank Tower
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Ms. Sato:

Subject: State of Hawaii Department of Transportation
Proposal to Construct Two Dewatering Facilities
Pearl City and Waianae Baseyards, Oahu, Hawaii

In response to your letter of August 17, 2006, regarding the above-mentioned project, the Honolulu Fire Department reviewed the material you provided and has no objections to the proposal.

In addition, please note that our new address is:

Honolulu Fire Department
636 South Street
Honolulu, Hawaii 96813-5007

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 723-7151.

Sincerely,


WAYNE T. NOJIRI
Acting Fire Chief

WTN/SK:bh

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111
http://www.honoluluupd.org
www.honolulu.gov

MUFI HANNEMANN
MAYOR



BOISSE P. CORREA
CHIEF

CLEN R. KAJIYAMA
PAUL D. PUTZULU
DEPUTY CHIEFS

OUR REFERENCE BS-DK

August 23, 2006

Ms. Larissa Sato, P.E.
Deputy Program Manager
Parsons Brinckerhoff Quade and
Douglas, Inc.
1001 Bishop Street, Suite 2400
Honolulu, Hawaii 96813

Dear Ms. Sato:

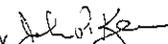
This is in response to your letter of August 17, 2006, regarding the state Department of Transportation's proposal to construct two dewatering facilities at the Pearl City and Waianae Baseyards.

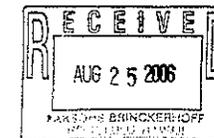
This project should have no significant impact on the facilities or operations of the Honolulu Police Department.

If there are any questions, please call Major Debora Tandal District 3 (Pearl City) at 455-9055, Major Michael Tamashiro of District 8 (Kapolei) at 692-4253, or Mr. Brandon Stone of the Executive Bureau at 529-3644.

Sincerely,

BOISSE P. CORREA
Chief of Police

By 
JOHN P. KERR
Assistant Chief of Police
Support Services Bureau



Serving and Protecting with Aloha

ROBERT BLANDA
PRESIDENT
DORNA MERCADO NIKA
VICE PRESIDENT
COLLEEN HANABUSA
MAJORITY LEADER
CLAYTON HEE
MAJORITY FLOOR LEADER
SHAN S. TSUTSUI
MAJORITY CAUCUS CHIEF CLERK
FRED HEARINGS
MINORITY LEADER
BOB HOGUE
MINORITY FLOOR LEADER
GORDON TRIMBLE
MINORITY POLICY LEADER

The Senate
The Twenty-Third Legislature
of the
State of Hawaii
STATE CAPITOL
HONOLULU, HAWAII 96813
October 17, 2006



Larissa Sato, Deputy Program Manager
Parsons, Brinckerhoff Quade & Douglas, Inc.
American Savings Bank Tower
1001 Bishop Street, Suite 2400
Honolulu, HI 96813

RE: State of Hawaii Department of Transportation
Proposal to Construct Two Dewatering Facilities
Pearl City and Wai'anae Basesyards, Oahu, Hawaii

I am writing in response to your letter of September 14, 2006 requesting information on any operational, environmental or social issue associated with the proposed dewatering facilities at Pearl City and Wai'anae. As the Senator of the 21st District spanning from Ko Olina to Ka'ena, my comments will pertain to the Wai'anae Baseyard location.

I am concerned about the impact of the proposed dewatering facility at the Wai'anae Baseyard location on the community since it is adjacent to Wai'anae Intermediate School, Wai'anae District Park, and Wai'anae Public Library. I have consistently opposed the expansion or siting of any new landfills along the Wai'anae Coast and have attached recent submittals reflecting this opposition pursuant to your request for information. These concerns expressed pertaining to landfills would similarly apply to the proposed dewatering facility, which would bring debris removed or cleaned from highway storm drains that cannot be disposed of at an approved landfill until properly dried. Thus, the concerns I have raised in the attached submittals pertaining to landfills should equally be addressed in the EA that is being prepared for the proposed dewatering facility at the Wai'anae Baseyard location. While I acknowledge that a few concerns are not directly applicable, the relevant concerns should be given due consideration.

Additionally, you should be advised that the State is planning to site a homeless shelter at the Wai'anae Civic center, adjacent to the proposed dewatering facility at the Wai'anae Baseyard location.

Sincerely,


Colleen Hanabusa
Senator, Twenty-First District

FIRST DISTRICT
LORRAINE H. ANDRUE
SECOND DISTRICT
RUSSELL S. MOKUURUHI
THIRD DISTRICT
PAUL WILHELM
FOURTH DISTRICT
SHAN S. TSUTSUI
FIFTH DISTRICT
REGINALD H. HANAUER
SIXTH DISTRICT
J. KALANI ENGLISH
SEVENTH DISTRICT
GARY L. HODGSON
EIGHTH DISTRICT
SAM SLOAN
NINTH DISTRICT
LES HANAUER, JR.
TENTH DISTRICT
BRIAN T. FARRELL
ELEVENTH DISTRICT
CAROL FURUKAWA
TWELFTH DISTRICT
GORDON TRIMBLE
THIRTEENTH DISTRICT
SUZANNE OLIN ORLANDO
FOURTEENTH DISTRICT
DORNA MERCADO NIKA
FIFTEENTH DISTRICT
NORMAN KAWALITO
SIXTEENTH DISTRICT
DAVID Y. ISE
SEVENTEENTH DISTRICT
RON WENDT
EIGHTEENTH DISTRICT
CLAUDINE K. KISHIMOTO
NINETEENTH DISTRICT
BRIAN HANAUER
TWENTIETH DISTRICT
WILL ESPINO
TWENTY-FIRST DISTRICT
COLLEEN HANABUSA
TWENTY-SECOND DISTRICT
ROBERT BLANDA
TWENTY-THIRD DISTRICT
CLAYTON HEE
TWENTY-FOURTH DISTRICT
BOB HOGUE
TWENTY-FIFTH DISTRICT
FRED HEARINGS
CHIEF CLERK
PAUL T. KAWAGUCHI

ROBERT BLANDA
PRESIDENT
DORNA MERCADO NIKA
VICE PRESIDENT
COLLEEN HANABUSA
MAJORITY LEADER
CLAYTON HEE
MAJORITY FLOOR LEADER
SHAN S. TSUTSUI
MAJORITY CAUCUS CHIEF CLERK
FRED HEARINGS
MINORITY LEADER
BOB HOGUE
MINORITY FLOOR LEADER
GORDON TRIMBLE
MINORITY POLICY LEADER

The Senate
The Twenty-Third Legislature
of the
State of Hawaii
STATE CAPITOL
HONOLULU, HAWAII 96813



August 30, 2006

Department of Environmental Services, Refuse Division
City & County of Honolulu
1000 Uluohia Street, Suite 212
Kapolei, HI 96707

RE: Comments for EIS preparation on the Expansion of Waimanalo Gulch Sanitary Landfill

To the Department of Environmental Services, Refuse Division:

The following are my comments which will set forth issues and concerns pertinent to the preparation of an EIS for this project.

Standard To Be Met.

The EIS process is governed by HRS §343. An EIS is:

§343-2 Definitions. As used in this chapter unless the context otherwise requires: . . .

"Environmental impact statement" or "statement" means an informational document prepared in compliance with the rules adopted under section 343-6 and which discloses the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects.

The statute also sets forth what the Rules must contain, at minimum. HRS §343-6. The legal effect of administrative rules are well settled in this jurisdiction. Administrative Rules are to be followed and given the full effect of law. *Williams v. Hawaii Medical Service Association*, 71 Haw. 545, 549, 7984 P.2d 442, 444 (1990). The Supreme Court has clearly stated that arbitrary and

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capricious application of the Rules will not be tolerated. *Windward Marine Resorts v. Sullivan*, 86 Haw. 171, 948 P.2d 592 (ICA 1997).

HAR §11-200-14 through 23 are the requirements in the preparation of Draft and Final Environmental Impact Statements. The "General Provisions" highlight the expectation of the EIS process.

I have grave concerns that you will comply with what is required of an EIS.

The following standard set in *Life of the Land v. Ariyoshi*, 59 Haw. 156, 164-165, 577 P.2d 1116 (1978) for a court to determine the sufficiency of an EIS:

In making such a determination the court is guided by the "rule of reason," under which an EIS need not be exhaustive to the point of discussing all possible details bearing on the proposed action but will be upheld as adequate if it has been compiled in good faith and sets forth sufficient information to enable the decision-maker to consider fully the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives. *County of Suffolk v. Secretary of Interior*, 562 F.2d 1368, 1375 (2d Cir. 1977), cert. den., 434 U.S. 1064, 98 S. Ct. 1238, 55 L. Ed. 2d 764 (1978).
[Emphasis added.]

The condition precedent to all EISs is that it be compiled in "good faith" and sets forth sufficient information. The past practice of the City has shown that EISs have not been compiled in good faith and nor does it provide sufficient information.

At the very minimum the City must take its past EISs and explain the discrepancies that have now been found and set forth whatever information it now relies upon to justify its change in position.

The best place to begin is with the discussion as to why we in the community have no rights to rely upon the representation of government that the WGSL will close. This is the position of the community that the WGSL should close.

What Was Represented As To The Closure.

At the outset, the City must explain why it has changed its position from an expansion of only 5 years to now an additional 15 years. I have heard comments from the City that there was never a "promise" to close the WGSL in 5 years; however, this is contrary to the statements made under oath to the Land Use Commission during their hearings on the conditional use permit as well as statements made in the Final Supplemental Environmental Impact Statement (FSEIS) for the 5 year expansion. The LUC was very clear in its questioning as to what the City intended to do. How does the City explain its statement under oath and the change in the FSEIS. A discussion should be had as to whether the City can be bound by its statements under oath like a person.

The EIS must address the following.

1. Waste Management's Contract

An EIS is "meaningless" if it is self-serving and rationalizes an outcome. The contract between Waste Management, Inc. and the City for the operation of WGSL was entered into in 1999 for 15 years. This was two years before the first Draft EIS in 2000; and three years before the FSEIS. At the very minimum, this shows the decision to expand WGSL was a done deal in 1999. Explain this contract and why the City entered into it in 1999. Also explain what was done after the City said the expansion would be for only 5 years. Was the contract amended?

2. Alternatives.

HRS §343-2 defines an EIS as one that discloses, among other items, the "alternatives to the action and their environmental effects."

HAR §11-200-17 addresses the requirement as to alternatives as follows:

- F. The draft EIS shall describe in a separate and distinct section alternatives which could attain the objectives of the action, regardless of cost, in sufficient detail to explain why they were rejected. The section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions. Particular attention shall be given to alternatives that might enhance environmental quality or avoid, reduce, or minimize some or all of the adverse environmental effects, costs, and risks. Examples of alternatives include: . . . (Emphasis added.)

Money is not the paramount criteria in arriving at a decision which is environmentally sound.

HAR §11-200-17 F. 5 states that "For any agency actions, the discussion of alternatives shall include, where relevant, those alternatives not within the existing authority of the agency." In *Westlands Water District v. U.S. Dept. of Interior*, 376 F.3d 853, 866 (9th Cir. 2004), the Ninth Circuit recently reaffirmed that alternatives must be rigorously explored and that "reasonable alternatives" include those not within the jurisdiction of the lead agency. *Westlands, supra*, at 868. The Ninth Circuit went on to say that "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate." *Id.*, citing to *Morongo Band of Mission Indians v. FAA*, 161 F.3d 569, 575 (9th Cir. 1998).

3. Failure to Comply with the City's Ordinance.

Ordinance 9-1/1(a)(6)(b)(1) states that by the year 2000, at least 75 percent of the solid waste generated shall be recycled, reused, composted, or otherwise diverted from incineration or placement in the landfill. What is the status and what is the consequence of this non-compliance?

4. Sludge

A major source of "odor" for the landfill is sludge. What is the City's treatment of sludge and for what period of time will it continue to be dumped in the landfill.

5. Purpose and Need.

HAR §11-200-17 D requires the Draft SEIS to "contain a separate and distinct section that includes a statement of purpose and need for a proposed action." It is a similar provision under NEPA, which is looked upon to guide the discussion on alternatives. *Westlands, supra*, at 866. In *Westlands*, the Ninth Circuit looked to whether the preparers had "arbitrarily and capriciously" narrowed the scope of the statement, thereby affecting the discussion on the alternative.

There is an application for a private landfill pending and also the fact that the Department of Agriculture will now permit the transshipment of MSW. These points must be addressed in discussing any need of the expansion, especially in light of the prior statements that there will be no need for landfills in 5 years.

6. Excavation

The City must address the discrepancies in all the draft EISs along with the reports provided by RM Towill to the Blue Ribbon Commission which was tasked with siting the new landfill. The criteria was no excavation. RM Towill determined that WGSJ had a life of 20 more years with the criteria. This is in direct conflict with other EISs also prepared by RM Towill. What does the City intend to do about this obvious misrepresentation? How does the City explain this discrepancy.

The extreme slope of WGSJ for the proposed expansion and the newly constructed rock berm are related. What is the stability of the expansion? How much native soil will have to be removed? Where will it be removed to? Will the excavated materials be sold?

7. Stability of the Slope

In light of the concern over the stability of slope as evidenced by the construction of the rock berm wall, how will the community be assured about its stability? How is the integrity of the liner tested? Will the rock berm wall act as the retaining wall to justify and increase in the slope?

8. The Violations of the Existing Permit

The Notice and Finding of Violation ("Notice and Finding") and Order dated January 31, 2006, of the Department of Health ("DOH") as to the operations of WGSL must be addressed. The first point of discussion is why the City had no oversight and permitted these activities to go unchecked. These violations resulted in the largest fine in the history of the State of Hawai'i.

The following violations are the most critical and must be addressed, though all violations should be addressed:

1. Since 2003, the City has placed ash above the 2002 grades and exceeded the design grades for over a year from discovery in January 2004.
2. The control of leachate and the monitoring was discovered. The DOH found 16.3 feet of leachate on the liner and 22 feet and 3 inches in the sump area. More troubling is no monitoring has been conducted since October 26, 2003. This was attributed to the ash monofill landfill.
3. As for the MSW landfill, in April 2005 and May 2005, 74 feet of leachate was measured. This was in an area where the sump was installed in November, 2003 (MSW Cell E-1). There was a gross failure to monitor the leachate
4. The leachate level in the area of 4B was unavailable because no monitoring had taken place since May.
5. The removal of soil and its impact on stability. DOH has found that in January of 2005, they were notified of the fact that grades were exceeded. The City knew that the ash had exceeded the approved grades by January, 2004 as to the ash landfill

6. Disposal of asbestos is a major concern. DOH found that the City and its operator accepted asbestos at the landfill but do not have any logs as to where it has been buried.
7. Surface Water Management. There are no surface water management plans as required by the permit for the years 2003-2004.
8. DOH found a failure to control dust.
9. DOH found a failure to control litter.
10. DOH found that there has been no monitoring of methane gas at the landfill.

The DOH Order entered in this action demonstrates the seriousness of the violations and its agency's (including County's) responsibility to monitor. There are also additional violations that were not included in the DOH Order, such as the applicant's failure to submit a revised Closure and Post-Closure Plan no later than May 1, 2005, which was finally submitted on February 22, 2006 and the operators unauthorized night work preparing a new cell for receiving waste.

9. How the Public Trust Is Being Met

The recent Hokulia case makes clear the State's public trust for the waters of our State. How has this trust obligation been met?

10. Cumulative Effects

This EIS cannot merely address the proposed expansion. It must address the cumulative effects of the operation of WGSL since the 1980s in addition to the proposed expansion on the Coast, including the disposal of leachate off site at the Waianae Wastewater Treatment plant.

11. Environmental Justice

The EIS must address the concept of environmental justice and how the City's use of this landfill and others in the Waianae Coast affect the community.

These are concerns and issues which must be addressed in the EIS. It continues to remain my position that WGSJ must close. I continue to be perplexed as to how the City can change its position without any sense of obligation of keeping its word to its people.

Sincerely,



Colleen Hanabusa
Senator, Twenty-First District

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The Senate
The Twenty-Third Legislature
of the
State of Hawaii
STATE CAPITOL
HONOLULU, HAWAII 96813



June 22, 2006

Mr. Stephen Joseph
Leeward Land, LLC
P.O. Box 2862
Waianae, HI 96792

Dear Mr. Joseph:

In response to the Environmental Impact Statement Preparation Notice (EISPN) summarized in the Environmental Notice on May 23, 2006, I am writing to request that I be a consulted party in the preparation of the upcoming draft environmental impact statement.

I must state clearly at the outset that I vehemently oppose the siting of yet another landfill on the Leeward Coast. The summary provided in the Environmental Notice indicates that the landfill facility is proposed to operate on approximately 172 acres near Nanakuli. The Notice also states that the "landfill is projected to handle approximately 1,500 tons per day of MSW and the landfill life is expected to be between 15 to 18 years." Although the EISPN is just a preliminary step in the environmental review process, I am concerned that the meager outline does not adequately summarize the potential impacts of the proposed landfill.

By way of comparison, it is important to note that the existing landfill at Waimanalo Guich Sanitary landfill encompasses about 200 acres and operates on 78.9 acres of land, consisting of 58.9 acres for the municipal solid waste sanitary landfill and 20 acres for the municipal solid waste ash monofill. With appurtenant uses such as stormwater management systems, offices, storage, and parking, the total acreage of the site is 100.9 acres. The existing landfill accepts 1,400 tons of municipal solid waste per day or about 800 tons of municipal solid waste and 600 tons of ash on a daily basis. Thus, the proposed landfill would be nearly equal in size at 172 acres and would handle about 1,500 tons per day of municipal solid waste or 100 more tons per day than the existing landfill. The proposed landfill's life expectancy of 15 to 18 years is nearly equal to the life of the current landfill - 17 years since the issuance of a special use permit in 1989.

Mr. Stephen Joseph
Leeward Land, LLC
06/22/06
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My purpose for comparing the proposed landfill with the existing landfill at Waimanalo Gulch Sanitary landfill is to highlight the significant nature of the proposed project, which is large enough to replace the existing landfill that services the island of O'ahu. More importantly, the recent \$2.8 million fine and pending administrative enforcement action against the current landfill operator and the City highlights the need to appropriately detail potential impacts and prepare mitigation measures.

Based on my review of the EISPN, I would like to highlight the following concerns. First, the Environmental Notice references the use of technology to reduce the volume and weight of municipal solid waste by up to half of its original size. While any reduction is undoubtedly beneficial, it is important to note that the EISPN indicates that "[a]pproximately two-thirds of the incoming waste, including mixed loads with relatively little organic material suitable for composting, will be directed to the landfill disposal area." In other words, of the 1,500 tons of municipal solid waste per day, approximately 1,000 tons would be directed to the landfill disposal area and only 500 tons would be processed using new technology reducing that volume by up to 250 tons.

Second, the location of residences and business to the south and southwest require special attention to environmental impacts such as geology and surface water and hydrology in addition to the concerns referenced with regard to air quality. The EISPN references that the surface water runoff flows southwest or in the direction of the residences. The geology or slope and surface water must be reviewed to eliminate any potential slippage as already evidenced at the current landfill.

Third, the draft environmental impact statement must provide detailed information about leachate levels and how the leachate collection system will be measured and monitored to ensure there is no contamination of adjacent areas that could potentially impact the groundwater for the surrounding area. General descriptions to industry standard operating procedures and best management practices are inadequate. Instead, specific information relative to the terrain and the area must be provided including the monitoring program and schedule.

Fourth, I disagree with the following statement in the EISPN:

"Due to the likely minor additional numbers of vehicles that would be associated with the project and the traffic conditions on the

Mr. Stephen Joseph
Leeward Land, LLC
06/22/06
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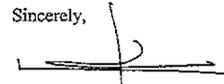
access route, there is not expected to be any adverse impact from project traffic."

As previously explained, the volume projected at the proposed landfill would equal that of the existing landfill. In this light, the traffic should be no less than that experienced at the current landfill. Additionally, the location of this site past a major residential community, several school complexes, and a shopping center along a stretch of Farrington Highway that has a history of traffic delays would greatly impact the community, particularly during high traffic hours in early morning, and after school and work.

Finally, the socio-economic and cultural impacts must be given full consideration. The proliferation of sites like the Nanakuli Demolition Waste Landfill and the Hawaiian Cement facility in a community with some of the worst socio-economic conditions in the state require adequate consideration. To address these concerns, environmental justice considerations must be incorporated in the draft environmental impact statement.

This initial list of concerns responds to the information provided thus far in the EISPN. In closing, I would like to reiterate my continued opposition to the siting of any additional landfills in the Leeward Coast including your proposed project.

Sincerely,



Colleen Hanabusa
Senator, Twenty-First District

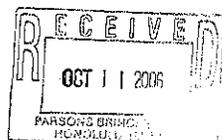
cc: Mr. Raymond Young, C&C, Dept. of Planning & Permitting
Dr. Shabnam Barati, URS Corporation
Ms. Genevieve Salmonson, Office of Environmental Quality Control



CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

GARY H. OKINO
Councilmember District VIII
Chair, Public Safety Committee
Telephone: (808) 547-7008
Facsimile: (808) 523-4220

October 5, 2006



Ms. Larissa Sato, P.E.
Parsons Brinkerhoff Quade & Douglas
1001 Bishop Street, Suite 2400
Honolulu, Hawaii 96813

Dear Ms. Sato:

**Re: State of Hawaii Department of Transportation
Proposed Dewatering Facility at Pearl City Base Yard**

Thank you for the opportunity to raise issues and concerns and provide early input on the State Department of Transportation's (SDOT) proposal to construct a dewatering facility at its base yard facility in Pearl City. Your inclusion and appropriate analysis of the following concerns in the forthcoming Environmental Assessment is appreciated:

1. **Traffic.** The only access to SDOT's Pearl City base yard is via Lehua Avenue. A steady flow of large trucks transporting wet, dripping debris and sludge will have an adverse impact on the structural integrity and general travel quality of this roadway, which serves as the primary means of ingress and egress for the surrounding residential, commercial and public facility uses. A thorough assessment of the proposed facilities impact on the long-term surface and structural integrity of Lehua Avenue is clearly warranted.

As Lehua Avenue is the primary means on ingress and egress for the entire Pearl City Peninsula, a traffic impact assessment is also warranted to ascertain the impact the expected number and timing of additional truck trips will have on traffic flow at varying times of the day and night.

2. **Noise.** The proposed facility is within earshot of numerous homes, apartments, special housing facilities and a school. The noise generated from the initial construction of the facility and the subsequent daily arrival, unloading, loading and departure of large trucks could adversely impact the quiet enjoyment of the surrounding community. A thorough assessment of the decibel levels and duration of the noise generated by the facility must be made, and the cost and effectiveness of noise mitigation treatments evaluated.

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October 5, 2006
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3. **Odor.** It is my understanding that the wet debris and sludge that is collected from the highway storm drains will be spread within the concrete lined basins to dry for some period of time. As it is quite possible that much of this debris will be decomposing vegetation mixed with roadway oil and chemical runoff, the odor produced may be substantial. As numerous homes and businesses are situated nearby, and an elementary school is located directly down wind from the facility, an assessment of the odor generated by the facility must be made, and the cost and effectiveness of odor mitigation treatments, including the possibility of providing air conditioning to all or a portion of Lehua Elementary School, should be evaluated.

4. **Dust.** It is also understood that the sediment and debris deposited at the dewatering facility will include residual oil and grease from vehicles using the State highways. However, the sediment could also include other chemicals (such as solvents, paints, brake fluid, transmission fluids, etc.) that are spilled or leaked onto the roadways. In addition, it was reported at a Pearl City Neighborhood Board meeting that concrete or chemicals could be added to the wet sediment to accelerate the drying process.

Although the facility will be covered by the H-1 Freeway structure, it will still be subject to certain elements, such as wind. An assessment of the potential short-term and long-term effects that airborne particulates blown from the facility could have on the health of students, residents and workers in the area should be evaluated.

5. **Insects/Vermin.** Wet mud, sediment and decaying litter/vegetation at the facility could draw insects and vermin such as flies, mosquitoes, rats and mongooses to the area. It should be determined if the material deposited at the facility will attract such unwanted pests and what measures should be taken to deter this from occurring.

Once again, thank you for soliciting my input on the SDOT's proposed Pearl City dewatering facility. If you have any questions, please feel free to call me at 547-7008.

Sincerely,

Gary H. Okino
Councilmember, District VIII