December 9, 2016

Dr. Alan Downer, Administrator
Hawai‘i State Historic Preservation Division
Department of Land and Natural Resources
Kakahihaewa Building
601 Kamokila Blvd., Suite 555
Honolulu, Hawaii 96707

Subject: Initiation of Consultation under Section 106 of the National Historic Preservation Act, 36 CFR Part 800, Proposed Replacement of the Hawaiian Homes Wastewater Pump Station Sewer Force Main, Wailuku Ahupua‘a, Wailuku District, Maui Island

Dear Dr. Downer:

The Maui County Department of Environmental Management is proposing to replace the existing Hawaiian Homes Wastewater Pump Station (WWPS) Sewer Force Main (SFM) along Waiehu Beach Road (see attached “Project Location Map”) within Wailuku Ahupua‘a, Wailuku District, Maui Island, and seeks to obtain feedback and comment from the State Historic Preservation Division (SHPD), as pursuant to Section 106, 36 CFR 800.3 of the National Historic Preservation Act (NHPA).

Regulatory Background & Purpose of Request

The U.S. Environmental Protection Agency (EPA) awards capitalization grants to States to establish State Revolving Fund (SRF) programs within state agencies as authorized under the Clean Water Act (CWA) (33 USC 1251 et. seq., as amended). As the proposed project will be funded through SRF assistance, and as SRF assistance is made available to States by federal capitalization funds, the proposed project is considered a Federal undertaking as defined by §800.16(y) and therefore subject to Section 106 of NHPA, 36 CFR Part 800. In compliance with the 1990 Programmatic Agreement on Historic Preservation for the State Revolving Fund, whereby the EPA authorized designated State agencies to carry out the requirements and responsibilities of NHPA as a condition of its award of any capitalization grants, the Department of Health (DOH) is initiating consultation pursuant to Section 106 §800.3 for the proposed project.
The purpose of this letter is as follows:

1) Introduce and provide background on the proposed undertaking;
2) Initiate consultation with SHPO pursuant to Section 106 CFR 800.3, as stated above;
3) Advise SHPO that the County intends to initiate consultation with Native Hawaiian Organizations (NHO) listed in the federal database, and any other organizations to be named or identified by SHPD or other means; and,
4) Invite public involvement in Section 106 consultation through advertisements in the Maui newspaper and Office of Hawaiian Affair’s newspaper, Ka Wai Ola, and through public meetings conducted with local residents.

**Project Description and Area of Potential Effect (APE)**

**Description of Existing Service**
The existing 10-inch SFM transports all wastewater from the Hawaiian Homes WWPS, which is located on Waiehu Beach Road in the Paukukalo Hawaiian Homestead neighborhood, to a manhole leading to the Wailuku WWPS, where the sewage is pumped to the Wailuku-Kahului Wastewater Treatment Plant. The Hawaiian Homes WWPS collects gravity-fed wastewater from the Paukukalo Hawaiian Homestead neighborhood, as well as the Waiehu Terrace, Waiehu Heights, Ho’o Hui Ana, Ocean View Estates, and Waiehu Kou neighborhoods. The replacement 12-inch SFM will provide the exact same service as the existing, but with increased carrying capacity.

**Existing SFM and Reason For Replacement**
The existing SFM consists of a buried 10-inch diameter pipe that conveys wastewater along approximately the same route as the proposed SFM. The need for replacement arose from two factors: 1.) the existing SFM is over 40 years old, which is considered the useful lifecycle of a ductile iron SFM; and 2.) a 2005 corrosion study of County-owned force mains, which identified portions of the SFM as susceptible of leaks due to internal corrosion within the next 12-15 years. The Maui County Wastewater Reclamation Division (WWRD) has implemented a proactive SFM replacement program to reduce SFM failures and resultant wastewater spills into the ocean or into waterways feeding to the ocean, thus avoiding potential EPA fines and other penalties as stipulated in the 1999 Consent Decree with the County.

**Project Location & Description**
The new, 12-inch SFM will also originate at the Hawaiian Homes WWPS. The new sewer pipe alignment turns south after exiting the WWPS then follows Lower Waiehu Beach Road for approximately 3,500 feet, terminating at a manhole near the Eluene Place intersection where it connects to an existing 18-inch sewer line (see attached “Project Location Map”).

The majority of the new SFM will be a buried 12-inch, PVC plastic pipe, to be routed as described above and in the attached site plan. Due to hydraulic factors, the pipe diameter expands to diameters of 16-, 18-, 20-, and 24-inch for varying stretches of the SFM alignment. The new SFM will be constructed via open-trench excavation, with a trench width of approximately 4-5 feet depending on the pipe diameter being installed at that location, and a buried depth 4 feet to the top of the pipe. At the Wailuku River crossing, the SFM will be hung from the underside of the newly-widened bridge deck. The total installed pipe length for the
project will be approximately 3,500 linear feet. Upon completion, the existing SFM will be maintained as an emergency back-up in the event the replacement SFM is accidentally damaged in the future.

The project also includes various improvements at the Hawaiian Homes WWPS such as pump & emergency generator replacement and miscellaneous mechanical & electrical work. However, excavation for this work will be limited to the removal of ~30 feet of an existing, shallow-buried fuel line.

**Impacts to APE**

Based on available information, the proposed action will not impose adverse visual, auditory, or other environmental impacts to any previously identified historic properties adjacent to the proposed realignment corridor. Accordingly, the APE for the proposed action extends no further than the approximate footprint of the proposed construction trench. The DOH requests concurrence with the above described APE.

**Early Consultation with the State Historic Preservation Division**

Early consultation for the proposed project was conducted with the Maui Island Archaeologist, on behalf of the County, by Mike Dega, Ph.D of Scientific Consultant Services, Inc. (SCS) in 2014. Given the history of the location of the project area and the history of archaeological findings, a draft archaeological monitoring plan (AMP) was drafted and submitted to SHPD in late 2014. A subsequent letter from SHPD - Maui Section (*Log No. 2015.02732, Doc No. 1507JP12*) concurred with the need for an archaeological monitoring program.

With authorization from the Department of Hawaiian Home Lands, SHPD reviewed the AMP, and in July 2015, the Maui Lead Archaeologist accepted the plan with the condition that SHPD be notified in writing at the initiation and completion of construction activities requiring monitoring (*Log No. 2015.02681, Doc No. 1507JP21*). The County, through its design services contract with Warren S. Unemori Engineering, Inc., is currently under contract with SCS to perform the construction monitoring as required. Construction is expected to begin in early 2017.

**Public Consultation**

On August 3, 2015, representatives from WWRD attended a community meeting of the Paukukalo Homestead Community Meeting at the Paukukalo Community Center to discuss the project. During this meeting, concerns with traffic and noise with regards to construction activities were raised by attendees, but no mention of any concerns with regards to archaeological or cultural impacts. WWRD plans on attending one more community meeting in Paukukalo prior to the start of construction.

WWRD also will publish a request for public comment in the Maui newspaper and Office of Hawaiian Affair’s newspaper, *Ka Wai Ola*, prior to start of construction activities.
Current Consultation Request

Under the purview of NHPA Section 106, the DOH requests that SHPD provide further consultation on the aforementioned project, in form of referrals to any known staff and/or external organizations who may provide further insight into known cultural & archaeological features of the project area, and the potential impacts to cultural & historical properties. It should be noted that other correspondence seeking consultation under NHPA Section 106, has been sent concurrently with this letter to the following organizations & advisory bodies: Office of Hawaiian Affairs, the Maui/Lāna‘i Islands Burial Council, Aha Moku o Maui, and the Maui County Cultural Resources Commission.

We ask that you review the information provided in this letter and respond with formal comment within 30 days of receipt. Please address any written comments you may have to the following:

Sue S. Liu, Environmental Engineer
State of Hawaii
Department of Health, Wastewater Branch
919 Ala Moana Boulevard, Room 309
Honolulu, Hawai‘i 96814

We appreciate your assistance with this request. Should you have any questions, please contact Mr. Dan Shupack, WWRD Project Manager, at (808) 270-7987. We look forward to your continued participation and guidance in this Section 106 consultation process.

Sincerely,

SINA PRUDER, P.E. CHIEF
Wastewater Branch

Enclosure: Project Location Map

cc: Mr. Dan Shupack, WWRD (via email at Dan.Shupack@co.mauhi.us)
Ms. Jenny Pickett, SHPD Maui (via email at Jenny.L.Pickett@hawaii.gov)
Mr. Vincent Hinano Rodrigues, SHPD Maui (via email at Hinano.R.Rodrigues@hawaii.gov)
Mr. Mike Dega, SCS (via email at mike@scshawaii.com)
Mr. Alan Unemori, WSUE (via email at alan@wsue.com)
Ms. Sue Liu, WWB DOH (via email at sue.liu@doh.hawaii.gov)