TO: THE HONORABLE SCOTT GLENN, DIRECTOR
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
DEPARTMENT OF HEALTH

FROM: JADE T. BUTAY
DIRECTOR OF TRANSPORTATION

SUBJECT: REQUEST TO PUBLISH DECLARATION OF EXEMPTION FOR CAPSTAR/IHEART TOWER ALTERATIONS PROJECT – JOB H.C. 10737

The Department of Transportation hereby transmits a copy of the above-referenced declaration of exemption from the preparation of an environmental assessment under the authority of Chapter 343, Hawaii Revised Statutes and Title 11-200, Hawaii Administrative Rules for your files. We request that this declaration of exemption be published in the next available issue of The Environmental Notice.

The Project is situated at the following locations:


2. The Sand Island Cargo Annex Yard, Sand Island identified as TMK: (1) 1-5-041:022 and coordinates: -157.885° West, 21.308° North.

3. The Piers 19 and 20 Cargo Yard, Honolulu Harbor identified as TMK: (1) 1-5-039:007 and coordinates: -157.868° West, 21.311° North.

4. The existing radio broadcast tower located within the Kokea Center Shopping Center, Kapalama identified as TMK: (1) 1-5-020:003 and coordinates: -157.873° West, 21.321° North.

If there are any questions, please have your staff contact Mr. Dean Watase of our Harbors Engineering Branch, Special Projects Section at (808) 587-1883.

Enclosure
DECLARATION OF EXEMPTION

from the preparation of an environmental assessment under the authority of Chapter 343, Hawai'i Revised Statutes (HRS 343), and Title 11-200-8(a)(8), Hawai'i Administrative Rules (HAR 11-200-8(a)(8)).

AGENCY OR APPLICANT ACTION

☒ This exempted action is an agency's Proposed Action as defined by HRS 343-5(b) and HAR 11-200-5.

☐ This exempted action is an applicant's Proposed Action as defined by HRS 343-5(c) and HAR 11-200-6.

SPECIFY EXEMPTION CLASS

☐ The Exemption Declaration for the Proposed Action described below is based on the Exemption List for the Department of Transportation, reviewed and concurred to by the Environmental Council on 11/15/2000.

• Exemption List Class_.

• Applicable language from the exemption list:

☒ The Exemption Declaration for the Proposed Action described below is based on the consultation process prescribed by HAR 11-200-8(a), Exemption Classes 1, 2, 3 and 8.

1. Exemption Class 1: Operations, repairs or maintenance of existing structures, facilities, equipment or topographical features, involving negligible or no expansion or change of use beyond that previously existing.

2. Exemption Class 2: Replacement or reconstruction of existing structures and facilities where the new structures will be located, generally on the same site, and will have substantially the same purpose, capacity, density, height and dimensions as the structure replaced.

3. Exemption Class 3: Construction and location of single, new, small facilities or structures and the alteration and modification of the same and installation of new, small, equipment and facilities and the alteration and modification of same.
4. Exemption Class 8: Demolition of structures, except those structures located on any historical site as designated in the National Register or Hawaii Register as provided for in the National Historic Preservation Act of 1966, Public Law 89-665, or Chapter 6E, Hawaii Revised Statutes.

DESCRIPTION OF PROPOSED ACTION

Proposing Agency or Applicant: Hawaii Department of Transportation (DOT).

Project Name & Address/Location: CAPSTAR/iHeart Tower Alterations Project, Job H.C. 10737. The Proposed Action involves three sites on Oahu – see Tax Map Keys (TMKs) below and Appendix A, Figures 1, 2 and 3 for their locations.

Anticipated Start Date: February 1, 2019 or upon receipt of all licenses, permits and access rights from pertinent jurisdictional authorities.

Anticipated End Date: July 31, 2019.

Island and Districts: O‘ahu, Honolulu and Waianae.

Tax Map Key(s) and latitude/longitude coordinates (in decimal degrees):

1. The existing FM radio tower (the Palehua site) on Palikea Ridge, Waianae Range identified as TMK (1) 9-2-005:024 and coordinates: -158.094° West, 21.390° North.
2. The Sand Island Cargo Annex Yard, Sand Island identified as TMK: (1) 1-5-041:022 and coordinates: -157.885° West, 21.308° North.
3. The Piers 19 and 20 Cargo Yard, Honolulu Harbor identified as TMK: (1) 1-5-039:007 and coordinates: -157.868° West, 21.311° North.
4. The existing radio broadcast tower (Tower) located within the Kokea Center Shopping Center, Kapalama identified as TMK: (1) 1-5-020:003 and coordinates: -157.873° West, 21.321° North.

Anticipated Permits and Approvals:

<table>
<thead>
<tr>
<th>PERMITTING AGENCY</th>
<th>PERMIT TYPE</th>
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</thead>
<tbody>
<tr>
<td>City and County of Honolulu, Department of Planning and Permitting</td>
<td>Demolition permit for the existing Tower site. Electrical permits for the existing Tower and the temporary sites. Zoning height variance for the existing Tower site. Other permits and approvals for the existing Tower site, including but not limited to: a conditional use permit for the existing Tower and a temporary loss of parking.</td>
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PROPOSED ACTION

The Proposed Action (also referred to as the Project) includes the individual actions necessary to reduce the height of the existing Tower located at 1111 Dillingham Boulevard, Honolulu, Hawaii, at the corner of Dillingham Boulevard and Kokea Street. Specifically, the purpose of the Project is to lower the height of the Tower from its current height of 447 feet to 315 feet in order reduce the impacts of a known avigational obstruction and create an alternate emergency flight path for use under certain conditions.

The Tower is privately owned: iHeartCommunications, Inc. was founded in 1972 under the name Clear Channel Communications Inc. The company grew since its founding and today operates as iHeartMedia, Inc. (iHeart). Capstar Radio Operating Company (CAPSTAR) is a subsidiary of Clear Channel Communications, Inc. and operates radio stations broadcasting AM and FM programs. CAPSTAR owns and operates the Tower as an affiliate of iHeart, and broadcast radio programs for three AM (KSSK 590, KHVH 830 and KIKI 990) and one FM (The Beat 93.9) radio stations. Collectively, this entity will be referred as CAPSTAR. CAPSTAR (as the tenant) and Kokea Center Partners LLC (as the landlord) are parties to a lease agreement dated February 12, 1985.

On July 1, 2018, State of Hawaii general funds of Five Million Dollars ($5,000,000.00) was secured by Act 53, Session Laws Hawaii 2018, Supplemental Appropriations Act of 2018 and Item C-66.02. On October 8, 2018, DOT obtained a sole source approval (Sole Source Number SS19-010S) for the use of Four Million Seven Hundred Thousand Dollars ($4,700,000.00) from the State Procurement Office to fund all direct and indirect hard and soft costs incurred by CAPSTAR in connection with the Project as the owner/builder because they possess the requisite specialized technical and operational experience. Additional funds may be provided to the Project as they become available. All aspects of the Project will be performed and managed by CAPSTAR (or its agents and selected contractors) in its sole discretion, including, without limitation, all planning and permitting, engineering and design, and construction activities. The use of State funds is the trigger for the completion of this HRS 343 document.

The Proposed Action requires four (4) phases to complete:

1. **Install new FM Equipment.** The FM broadcasting component resides on the upper portion of the existing 447-foot tall Tower. Before the Tower can be shortened, the FM transmitter equipment, cabling and support structures (FM Equipment) used to operate and transit FM broadcast transmissions must be replaced with new FM Equipment and broadcast services re-established to avoid loss of services. There is space in an existing 1,400 square feet building to accommodate an additional FM Equipment at the Palehua site, Palikea Ridge. This site is located above Makakilo Heights along the Waianae mountains and is home to a number of existing FM radio broadcast towers.

   This phase involves the installation of new FM Equipment to one of the existing towers at the Palehua site, Palikea Ridge. After the new FM Equipment is installed and calibrated, broadcasting from this location can commence.

2. **Build temporary AM antenna.** AM broadcasting services from the Tower must be terminated before construction activities can commence for worker safety. This will require establishing temporary AM antenna systems at two locations. The first system...
will be located at the Sand Island Annex Yard, which is located makai of the Sand Island Parkway Road and across the Sand Island Container Terminal, Honolulu Harbor. The second system will be at the Piers 19 and 20 Cargo Yard, which is located makai of Nimitz Highway, Honolulu Harbor.

This phase includes the construction of two temporary AM antenna systems followed by the installation of new AM transmitter equipment cabling and support structures (AM Equipment) to broadcast signals for three AM radio stations on each system. It is estimated that it will take one week to setup the system, two weeks to operate it while the Tower is shortened and one week to deconstruct the system. Each temporary AM antenna system consists of three basic components:

i. an aerial system,
ii. a ground system, and
iii. an enclosure for the transmitters and associated equipment.

First, at the Sand Island Annex Yard, five existing 40-foot high light poles will be used to support the aerial component of this system. Four light poles will form the corners of a square approximately 300 feet by 300 feet, with the fifth pole located at the center of the square. Aerial wires will be mounted on the top of the light poles at each corner to the top of the center pole, forming an "X" shaped pattern. Aerial wires will run down the center light pole and into the enclosure where the AM Equipment will be housed.

In addition, at the Piers 19 and 20 Cargo Yard, three existing 50-foot high light poles will be used to support the aerial component of this system. Aerial wires will be mounted on the top of the light poles to the top of the center pole. Aerial wires will run down the center light pole and into the enclosure where the AM Equipment will be housed.

Second, the ground component of this system will consist of approximately 120 aluminum wires laid on top of the ground, each about 150 feet long. The wires will be arranged in a radial pattern spreading outward from the center light pole and spaced about 3 degrees apart.

Third, a temporary enclosure (roughly the size of an eight-foot by eight-foot container known as a G-van or similar) will be placed near the center light pole to shelter the radio transmitter equipment and its power supply. Power from the light pole will be used as the electrical source for the transmitter equipment. If no reliable power source is available, a generator will be used. After the new AM Equipment is installed, powered and calibrated, AM broadcast services from the temporary system will commence.

2. **Shorten the Tower and install new AM Equipment.** Once the temporary AM antenna systems at both locations are operational, construction activities on the Tower can commence.

This phase includes temporarily securing the construction site around the Tower while construction activities are underway. It is anticipated that the inner parking lot will be used and some of the outside parking as well. Once the area is secured, construction will start with the removal of the upper 135 feet of the Tower using a construction jib or crane to bring down the sections. Once the Tower is shortened and the structure is stabilized, a 54 feet diameter sidewise wheel will be installed at the top of the Tower,
essentially extending outward horizontally or parallel to the ground the lost Tower height. In addition, a three-foot high obstruction beacon will be installed on top of the Tower bringing the total height up to 315 feet above ground level. This beacon is a required safety feature and will be similar to the beacon that currently occupies the top of the Tower. New AM Equipment will be installed within the existing housing located at the base of the Tower. Once the new AM Equipment is calibrated, broadcast services for the three AM stations will commence.

3. **Deconstruct temporary AM antenna.**

   This action includes deconstructing the temporary antenna systems, removing all equipment and restoring the Sand Island Annex Yard and the Piers 19 and 20 Cargo Yard sites back to their original condition.

This Proposed Action qualifies for the exemption from HRS 343 because it is not expected to have significant adverse effect on the environment with the identified mitigation measure in place. The Proposed Action involves minor modifications to existing radio broadcast towers and the establishment of a temporary antenna system. All construction activities are temporary in duration and will be regulated by applicable federal, state and county statutes, ordinances and regulations to minimize any potential impacts from the Proposed Action. A *Construction Management and Communications Plan* (CMCP, described below) will be prepared prior to the start of the Project by CAPSTAR's contractor that will minimize impacts to users of the site surrounding the existing Tower at the Kokea Shopping Center. Best management practices (BMPs) will be used to minimize impacts during construction activities. In addition, remuneration to affected parties will be made by CAPSTAR's contractor to compensate for any economic disruptions or losses if necessary.

**RECEIVING ENVIRONMENT**

The Proposed Action involves four sites located throughout Oahu. The first three sites are located within the Honolulu district while the fourth is located in the Waianae district. Sites are:

1. **There are existing FM tower farms located at the top of Palikea Ridge above Makakilo** – see Appendix A, Figure 1. The property is privately owned by Gill Ewa Lands, LLC and Edmund C. Olsen Trust II, and the candidate FM radio broadcast tower is leased to Salem Media of Hawaii (Palehua tower site). The land-use characteristics surrounding this site is a wooded forest.

   The entire site is approximately 3,593 acres in size and is zoned Restricted Preservation District (P-1). Access to the site is through Palehua Road that goes up to the Palikea Ridge. The Palehua tower is about 200 feet tall. It was built in 2000 and it is not listed as a historic structure.

2. **The Sand Island Cargo Annex Yard is located along Sand Island Parkway in Sand Island** – see Appendix A, Figure 2. DOT-H has managerial control over this site through Governor's Executive Order 4170 that was executed in 2006. The land-use characteristics around this site includes industrial, recreational and public uses.
The Sand Island Cargo Annex Yard is approximately 5 acres in size and zoned General Preservation District (P-2). The temporary antenna site will be located within the Annex Yard and will require approximately 2 acres of the eastern portion of the site. Access to the Annex Yard is through Sand Island Parkway and an internal road to DLNR's recreational area on the opposite side of Pasha Hawaii's entrance gate. The entire Annex Yard is covered with asphalt concrete pavement.

The Annex Yard is located within the Special Management Area; however, DOT Harbors Division’s projects are exempted from county requirements per HRS 266-2(b).

3. The Piers 19 and 20 Yard is located along Nimitz Highway in Honolulu Harbor and it is adjacent to the Ferry Terminal Building – see Appendix A, Figure 3. DOT-H has managerial control over this site through Governor’s Executive Order 2903 that was executed in 1978. The land-use characteristics around this site includes maritime and industrial uses.

The Piers 19 and 20 Cargo Yard is approximately three acres in size and zoned Waterfront Industrial District (I-3). The temporary antenna site will be located between three light poles in the middle of the Cargo Yard and will require approximately two acres. Access to the Piers 19 and 20 Yard is through Pacific Street. The entire Cargo Yard is covered with asphalt concrete pavement.

4. The Kokea Center Shopping Center where the existing Tower is located is situated at the corner of Dillingham Boulevard and Kokea Street in Kapalama – see Appendix A, Figure 4. The following businesses are located within the Kokea Shopping Center. Tenants at the Kokea Shopping Center and businesses surrounding will be sent notification letters as a courtesy notice that a construction project is being planned in 2019.

The land-use characteristics around this site includes numerous small businesses surrounding the shopping center, an educational institution to the north (i.e., Honolulu Community College) and a water body to the west (i.e., Kapalama Canal). The shopping center is approximately 3 acres in size and zoned Industrial Mixed use (IMX-1). The existing Tower is located at the rear of the shopping center and in the middle of a triangle-shaped parking lot.

Access to the shopping center is through Dillingham Boulevard and Kokea Street, and access to the existing Tower is through two internal roadways. The existing Tower was built in 1985 and it is not listed as a historic structure.

MITIGATION

The Project will incorporate the following measures as part of the Project to mitigate potential impacts prior to the start of construction activities:

Construction Management and Communications Plan (CMCP). A CMCP will be prepared by the contractor to establish logistical, safety and communication protocols before construction on the Project starts at each site. The objective of the CMCP is to ensure the safety of the
public and construction personnel with the Project is under construction, and to minimize impacts to affected parties and the surrounding area. At minimum, the CMCP will:

1. Identify boundaries of each construction site that would limit public access.
2. Identify all construction activities that will occur at the site including the work schedule.
3. Establish communications protocols to notify the public surrounding each construction site.
4. Prepare a construction safety risk assessment and mitigation report that would identify safety issues and propose options to minimize the risks.
5. Identify construction best management practices to be used at each construction site.
6. Identify traffic controls that considers the type, frequency and route of heavy construction vehicles and cranes traversing to and from the construction sites.

In all cases, the contractor will make every effort to limit and minimize impacts to each site from vehicles and associated construction activities, including utilizing off-site parking areas for construction vehicles, workers and other traffic related considerations.

ENVIRONMENTAL ANALYSIS

DOT has considered the potential effects of the Proposed Action and all related activities against the criteria checked below:

- Land Use and Zoning Conformance
- Roadways and Circulation (Vehicles, Bicycles, Pedestrian)
- Infrastructure and Utilities
- Social-Economic
- Public Health and Safety, and Public Services
- Recreational Resources
- Cultural, Historic and Archeological Resources
- Visual and Aesthetic Resources
- Terrestrial and Benthic Resources
- Surface and Ground Water Resources
- Wetlands, Floodplains and Riparian/Coastal Resources
- Air Quality Pollutant Emissions
- Noise Emissions
- Solid, Hazardous, and Liquid Waste Emissions
- Other (As noted below)
Highlights of the analysis broken down by Project components are listed below:

**Phase I: Install the FM transmitter.**

1. **Land Use and Zoning Conformance.** The Project conforms to existing land use and zoning designations of the surrounding area. The area surrounding the Palehua tower site is zoned Restricted Preservation District (P-1). The installation of new FM Equipment will be done in an existing 1,400 square feet building. The use is consistent with the established uses in the area and will not affect the purpose and height of the existing FM tower.

   Therefore, the Project will have no adverse impacts on land use or zoning conformance. No mitigation measures are proposed or anticipated to be required.

2. **Roadways and Circulation (Vehicles, Bicycles, Pedestrian).** All construction work will be done within the footprint of the Palehua tower site. Except for a negligible and temporary increase in traffic due to construction vehicles, and the mobilization and demobilization of construction equipment, no roadways or circulation will be impacted.

   Therefore, the Project will have no adverse impacts to roadways and circulation at or around the Project site. No mitigation measures are proposed or anticipated to be required.

3. **Infrastructure and Utilities.** Hawaiian Electric Company (HECO) provides electrical power to its Oahu clients. All electrical improvements will be coordinated with HECO prior to ensure the electrical system can support any increase in demand. The overall power consumed by the new FM Equipment will be offset by the power no longer needed at the existing Tower. In addition, the Project will not create demand on potable water or wastewater systems.

   Therefore, the Project will have no adverse impacts to infrastructure and utilities. No mitigation measures are proposed or anticipated to be required.

4. **Public Health and Safety, and Public Services.** Radio broadcast stations transmit their signals via radiofrequency (RF) electromagnetic waves. The nature and degree of the health effects of overexposure to RF fields depend on the frequency and intensity of the fields, the duration of exposure, the distance from the source, any shielding that is used and other factors. The main effect of exposure to RF fields is heating of body tissues as energy from the field are absorbed by the body. Other hazards include contact shocks and RF burns. The Federal Communications Commission has established maximum permissible level for human exposure to RF at 580 microwatts per square centimeter over a 30-minute period. All applicable regulations will be followed to ensure worker and public safety.

   While the new FM Equipment is installed, the Palehua tower site will be de-energized for the safety of the construction crew. After installation is completed, the FM Equipment will be calibrated and energized. Any interruption to FM broadcast services at the Palehua tower site will be temporary and only last a few hours during the late-evening hours.
The Palehua tower site is located in a remote location and away from residential areas. Public access to this facility is restricted so that individuals will not be exposed to RF fields that exists near antennas.

Therefore, the Project will have no adverse impacts to health and safety, and public services. No mitigation measures are proposed or anticipated to be required.

5. **Cultural, Historic and Archeological Resources.** There are no known cultural activities at the site. The Palehua tower was built in 2000. There will be no ground disturbing construction activities required, such as trenching or grading.

Therefore, the Project will have no adverse impacts to cultural, historic and archeological resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

6. **Visual and Aesthetic Resources.** The Project site, Palikea Ridge, Waianae already hosts several radio towers. The new FM Equipment will be installed on one of those existing towers and will not change the appearance and visual character of the site.

Therefore, the Project will have no adverse impacts to visual and aesthetic resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

7. **Terrestrial and Benthic Resources.** The terrestrial characteristics of the site consists of a wooded ridgeline. The new FM Equipment will be added onto an existing operational tower, so no impacts to terrestrial flora and fauna in the area are expected. There is no in-water work associated with this Project.

Therefore, the Project will have no adverse impacts to terrestrial flora or fauna, and benthic resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

8. **Noise Emissions.** There may be low-level construction noise associated with the installation of the new FM Equipment. All work will be short-term in duration. If the noise emissions are above standards stipulated in Hawaii Administrative Rules, Title 11-46, a permit will be required regulating the permissible noise levels.

Therefore, the Project will have no adverse impacts from noise emissions on the surrounding neighborhood. No mitigation measures are proposed or anticipated to be required.

**Phases II and IV: Build and deconstruct a temporary AM antenna system to host new AM Equipment during construction.**

1. **Land Use and Zoning Conformance.** The Project conforms to existing land use and zoning designations of the surrounding area. The Sand Island Annex Yard site is zoned General Preservation District (P-2). The installation of temporary AM antenna system with its associated AM Equipment is consistent with established industrial uses in the area. In addition, Sand Island is located in the City and County of Honolulu’s Special
Management Area (SMA). Pursuant to Section 266-2(b), DOT-H is exempt from county requirements including SMA.

Therefore, the Project will have no adverse impacts on land use or zoning conformance. No mitigation measures are proposed or anticipated to be required.

2. Roadways and Circulation (Vehicles, Bicycles, Pedestrian). All work will be done within the Sand Island Annex Yard, and all construction equipment will be stored within the yard. Except for a negligible and temporary increase in traffic due to construction vehicles, and the mobilization and demobilization of construction equipment, no roadways or circulation will be impacted.

Therefore, the Project will have no adverse impacts to roadways and circulation at or around the Project site. No mitigation measures are proposed or anticipated to be required.

3. Infrastructure and Utilities. Two-hundred twenty volts, three phase electrical power is available at the Sand Island Annex Yard. All electrical improvements will be coordinated with HECO prior to construction to ensure the electrical system can support any increase in demand. The power requirements to run the temporary antenna system will be a fraction of the power requirements for the existing Tower, which will be turned off during construction activities. In addition, the Project will not create demand on potable water or wastewater systems.

Therefore, the Project will have no adverse impacts to infrastructure and utilities. No mitigation measures are proposed or anticipated to be required.

4. Socio-Economic. Approximately two acres each of the Sand Island Annex Yard and the Piers 19 and 20 Yard will be needed for the temporary antenna systems and consequently will not be available for cargo operations during this period. This will result in a temporary reduction in cargo space of less than five percent of the total cargo yard area available at Sand Island. In addition, the AM broadcast services produced by the temporary antenna will have reduced capabilities compared to the existing Tower and therefore will reach a fewer number of listeners. There may be a temporary loss of the AM stations’ ability to reach its target audience during this time, possibly resulting in decreased revenue from advertisers.

Therefore, the Project will have no adverse impacts to socio-economic conditions. No mitigation measures are proposed or anticipated to be required.

5. Public Health and Safety, and Public Services. Radio broadcast stations transmit their signals via radiofrequency (RF) electromagnetic waves. The nature and degree of the health effects of overexposure to RF fields depend on the frequency and intensity of the fields, the duration of exposure, the distance from the source, any shielding that is used and other factors. The main effect of exposure to RF fields is heating of body tissues as energy from the field are absorbed by the body. Other hazards include contact shocks and RF burns. The Federal Communications Commission has established maximum permissible level for human exposure to RF at 580 microwatts per square centimeter over a 30-minute period. All applicable regulations will be followed to ensure worker and public safety.
The temporary antenna system will be constructed in a remote location and away from densely populated areas. Industrial uses include the Sand Island Container Terminal to the northeast and the Honolulu Wastewater Treatment Plant to the east. Public uses include the Sand Island State Recreational Area to the west and southwest, Hale Mauliola and the BMX Sandbox to the northwest. The power output will not exceed 1,000 watts per station and the signal strength will be significantly reduced compared to the existing Tower. Public access to this facility will be restricted to limit any exposure to high-level RF fields that exists near antennas.

KSSK AM 590 is the state's designated Emergency Alert System radio station and is responsible for broadcasting emergency alerts in the event of disasters such as a tsunami, hurricane, terrorist attack, etc. Because the broadcasting range from the temporary antenna system will be less than the existing Tower, potentially fewer people will be able to receive an emergency alert AM signal during the approximately four- to six-week period the temporary antenna system is in use. However, KSSK will still have its FM broadcast capabilities and other AM stations will be available.

Therefore, the Project will have no adverse impacts to health and safety, and public services. No mitigation measures are proposed or anticipated to be required.

6. Cultural, Historic and Archeological Resources. There are no known cultural activities at the site as it is secured from public access. In addition, there will be no ground disturbing construction activities required, such as trenching or grading.

Therefore, the Project will have no adverse impacts to cultural, historic and archeological resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

7. Visual and Aesthetic Resources. The temporary antenna systems will consist of three visible components. First, at the Sand Island Annex yard, the aerials will be mounted on top of the existing 40-foot tall yard light poles with the visible aerials forming an "X" shaped pattern connecting the four corners together. The overhead wires will be between 300 and 425 feet long. At the Piers 19 and 20 Yard, the aerials will be mounted on the top of the three existing 50-foot high yard light poles. Each light pole is between 162 and 182 feet apart from each other. Second, 120 aluminum wires will be place on the ground radially from the center light pole and each wire will be 150 feet long and spaced about 3 degrees apart. Third, the housing the AM transmitters. This system will be in place for approximately four weeks where no other activity can take place.

Therefore, the Project will have no adverse impacts to visual and aesthetic resources because of its unobtrusive appearance and temporary nature. No mitigation measures are proposed or anticipated to be required.

9. Terrestrial and Benthic Resources. The site is developed with an asphalt pavement covering the area. In addition, overhead aerial wires will be added on top of existing light poles at an elevation of 40 feet high at the Sand Island Annex yard and 50 at the Piers 19 and 20 Yard. The aerial wires will be activated but will not injure airborne wildlife that lands on them. There is no in water work associated with this Project.
Therefore, the Project will have no adverse impacts to terrestrial flora or fauna, and benthic resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

8. **Noise Emissions.** There may be low-level construction noise associated with the installation of the temporary antenna and its associated transmitter equipment. All work will be short-term in duration. The emergency generator may increase noise levels during power outages. If the noise emissions are above standards stipulated in Hawaii Administrative Rules, Title 11-46, a permit will be required regulating the permissible noise levels.

Therefore, the Project will have no adverse impacts from noise emissions on the surrounding neighborhood. No mitigation measures are proposed or anticipated to be required.

**Phase III: Shorten the Tower, install the new AM Equipment and resume normal broadcasting.**

1. **Land Use and Zoning Conformance.** The Project conforms to existing land use and zoning designations because the existing Tower is consistent with the established uses in the area. The existing Tower site is zoned Industrial Mixed Use (IMX-1), which permits a range of various uses under the designation.

Therefore, the Project will have no adverse impacts on land use or zoning conformance. No mitigation measures are proposed or anticipated to be required.

2. **Roadways and Circulation (Vehicles, Bicycles, Pedestrian).** All construction activities will be contained within the Kokea Shopping Center, and all equipment will be stored within the designated area at the construction site. Except for a temporary increase in traffic due to the movement of construction vehicles, and the mobilization and demobilization of equipment, no roadways will be impacted. In addition, parking immediately surrounding the existing Tower will be temporarily impacted for about two weeks while construction take place. It is anticipated that the inner parking lot will be used and some of the outside parking as well. Traffic within the parking lot may become more congested temporarily because there will be fewer parking stalls available for patrons. Finally, there may be a potential increase in the amount of pedestrian traffic in and around the shopping center because some customers may need to find on-street parking and walk to their destination. Bicycle traffic is not expected to be impacted and no designated bike lanes will be impacted.

Therefore, the Project will have no adverse impacts to roadways and circulation at or around the Project site with the implementation of the CMCP that will address traffic on the roadways, parking and congestion issues. No additional mitigation measures are proposed or anticipated to be required.

3. **Infrastructure and Utilities.** HECO provides electrical power to its Oahu clients. The power consumed by the new transmitter equipment combined with the sidewise wheel will require about 10 percent more electrical power with the goal to replicate the existing signal strength. In addition, the Project will not create demand on potable water or wastewater systems.
Therefore, the Project will have no adverse impacts to infrastructure and utilities. No mitigation measures are proposed or anticipated to be required.

4. Social-Economic. There will be temporary economic impacts to the Kokea Shopping Center businesses, but it will be minimized by ensuring that patrons are provided access to the bushiness.

Therefore, the Project will have no adverse economic impacts with the implementation of the CMCP that will minimize business disruptions, and with the remuneration made to impacted businesses due to their temporary closure. No additional mitigation measures are proposed or anticipated to be required.

5. Public Health and Safety, and Public Services. Radio broadcast stations transmit their signals via radiofrequency (RF) electromagnetic waves. The nature and degree of the health effects of overexposure to RF fields depend on the frequency and intensity of the fields, the duration of exposure, the distance from the source, any shielding that is used and other factors. The main effect of exposure to RF fields is heating of body tissues as energy from the field are absorbed by the body. Other hazards include contact shocks and RF burns. The Federal Communications Commission has established maximum permissible level for human exposure to RF at 580 microwatts per square centimeter over a 30-minute period. All applicable regulations will be followed to ensure worker and public safety.

The existing Tower sits on top of a 10-foot-high concrete podium, which is designed to create a buffer space from any potential RF waves that the existing Tower produces from the public.

The Federal Communications Commission requires that the signal strength from the existing Tower be no greater than what is currently produced to avoid interference with the Monitoring Station located in Waipahu. This means that RF energy produced by the modified Tower will be the same. After the existing Tower has been shortened, RF measurements will be performed and compared to the output of the pre-shorten Tower to confirm that RF levels are within the Federal Communication Commission guidelines.

The shortening of the existing Tower the and installation of the side wise wheel may impact the quality of signal to some degree especially along the outer edges of broadcast coverage area. DOT will compensate CAPSTAR/iHeart for the loss of signal quality and the increase in power costs. In addition, the reduced Tower will have no impacts to the existing potable water or wastewater systems as no additional demands are required.

As with any construction project, there are potential risks to public safety associated with shortening the Tower. A CMCP will be prepared to address public safety around the construction site.

Therefore, the Project will have no adverse impacts to health and safety, and public services with the implementation of the CMCP that will address worker safety and the remuneration made to businesses due to disruptions of their services. No additional mitigation measures are proposed or anticipated to be required.
6. Cultural, Historic and Archeological Resources. There are no known cultural activities at the site because the area surrounding the base of the Tower is private property and restricted to commercial activities. In addition, there will be no ground disturbing construction activities required, such as trenching or grading. The existing Tower was built in 1985 and is not a historic property.

Therefore, the Project will have no adverse impacts to cultural, historic and archeological resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

7. Visual and Aesthetic Resources. The Tower will be shortened from 447 feet to 315 feet high. A 54-foot diameter sidewise wheel will be installed at the top of the Tower, which will help mitigate the loss of the height by extending the tower sideways. The existing Tower has been situated at the Kokea Shopping Center for over 30 years. Shortening the Tower and the addition of the sidewise wheel will alter the look of the Tower; however, it will not change the visual and aesthetic character of this mixed commercial/industrial area.

Therefore, the Project will have no adverse impacts to visual and aesthetics resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

8. Terrestrial and Benthic Resources. Kokea Shopping Center is developed with either buildings, asphalt pavement covering the Kokea Shopping Center or vegetative landscaping features along the perimeter of the property. In addition, the Tower sits on a 10-foot high concrete podium. Once the Tower is shortened, the risk to any airborne wildlife will likely decrease because the height of the existing Tower will be 132 feet shorter than before, representing a beneficial impact associated with the Project. In addition, the beacon light at the top of the Tower will be replaced by a similar 3-foot-high unit. There is no in water work associated with this Project.

Therefore, the Project will have no adverse impacts to terrestrial flora or fauna, and benthic resources at and around the Project site. No mitigation measures are proposed or anticipated to be required.

9. Noise Emissions. There may be low-level construction noise associated with shortening the Tower and the installation of the new AM equipment. Noise emissions will be short-term in duration. If the noise emissions are above standards stipulated in Hawaii Administrative Rules, Title 11-46, a permit will be required regulating the permissible noise levels.

Therefore, the Project will have no adverse impacts from noise emissions on the surrounding neighborhood. No mitigation measures are proposed or anticipated to be required.

Secondary Impacts. Secondary impacts are those that result from the Proposed Action that are further away in time and distance. Considering all phases of the Proposed Action collectively and the nature of the various parcels where the individual actions are taking place,
the Project is not expected to have any adverse secondary impacts on the receiving environment because of the temporary nature of the construction activities.

**Cumulative Impacts.** Cumulative impacts are those that result from the incremental impact of the Proposed Action when added to other past, present and known future actions regardless of what agency or persons undertakes such other actions. The other known project near the existing Tower includes the construction of the Kapalama Rail Station by Honolulu Authority for Rapid Transportation; however, construction for the rail station is no expected to start after the completion of this Project. At the temporary AM antenna site at the Sand Island Annex Yard, DOT Harbors is undertaking construction of the Kapalama Container Terminal, Phase I (i.e., yard component). Both projects cumulatively will lead to a slight increase in construction traffic volume; however, considering all phases of the Proposed Action collectively plus all other known projects around the four sites, the Project is not expected to have any adverse cumulative impacts on the receiving environment.

**CONSULTATIONS**

DOT consulted with the following parties prior to issuing this declaration exemption:

<table>
<thead>
<tr>
<th>AFFILIATION</th>
<th>NAME &amp; TITLE</th>
<th>DATE CONSULTED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Communications Commission, Region Three</td>
<td>Hadley Lark, Regional Director</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Federal Aviation Administration</td>
<td>Gordon Wong, Honolulu District Manager</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Department of Business, Economic Development and Tourism, Office of Planning</td>
<td>Leo Asuncion, Director</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Department of Health</td>
<td>Bruce Anderson, Director</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Department of Land and Natural Resources</td>
<td>Suzanne Case, Chairperson</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Department of Land and Natural Resources, Division of Boating and Ocean Recreation</td>
<td>Ed Underwood, Administrator</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Department of Land and Natural Resources, Division of State Parks</td>
<td>Curt Cottrell, Administrator</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Department of Land and Natural Resources, State Historic Preservation Division</td>
<td>Alan Downer, Administrator</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Hawaii Emergency Management Agency</td>
<td>Major General Arthur J. Logan, Director</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>City and County of Honolulu, Department of Emergency Management</td>
<td>Toiya Hirokazu, Director</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>City and County of Honolulu, Department of Permitting and Planning</td>
<td>Kathy Sokugawa, Acting Director</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Matson Terminals</td>
<td>Vic Angoco, President</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Pasha Hawaii</td>
<td>Michael Caswell, President</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Airlines Committee of Hawaii</td>
<td>Blaine Miyasato, Co-Manager</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>Kamehameha Schools</td>
<td>Walter Thoemmes</td>
<td>12/11/2018</td>
</tr>
<tr>
<td>BMX Sandbox</td>
<td>Kris Moniz, Track Operator</td>
<td>12/11/2018</td>
</tr>
</tbody>
</table>
The following comments were received:


2. Department of Land and Natural Resources, Division of Boating and Ocean Recreation. Ed Underwood, Administrator. Email sent on 12/19/2018. No comments.


5. Department of Land and Natural Resources, Engineering Division. Carty Change, Chief Engineer. The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code and Federal Regulations (44 CFR) are in effect when development falls within the Special Flood Hazard Area. State projects are required to comply with 44 CFR regulations as stipulated in Section 60.12. DOT will research and comply with any regulations as necessary.


EXEMPTION DECLARATION

The direct, cumulative, and potential impacts of the Proposed Action described above have been considered pursuant to HRS 343 and HAR 11-200. DOT declares that the Proposed Action described above will have minimal or no significant impact on the environment and is therefore exempt from the preparation of an environmental assessment.

JADE T. BUTAY
Director of Transportation

Date

List of Appendices:

1. Appendix A – Site Plans (Figures 1, 2, 3 and 4).
2. Appendix B – Sample consultation letter and attachment sent out.
3. Appendix C – Comment letters received.
APPENDIX A
SITE PLANS

FIGURE 1 - Location of Palehua tower site, Palikea Ridge, Waianae

A new transmitter for the FM Station 93.9 will be located on Palikea Ridge.

FIGURE 2 - Location of Temporary AM Antenna at Sand Island Annex Yard

Radial ground system consisting of 120 aluminum wires spaced every 9 degrees.

Overhead wires connecting each corner pole to the central pole. Existing Poles are spaced 300 feet apart.

Protective structure, such as a shipping container, to house and operate the AM transmitters.
FIGURE 3 - Location of Temporary AM Annetta at Piers 19 and 20 Cargo Yard

Radial ground system consisting of 120 aluminum wires spaced every 3 degrees.

Temporary enclosure, such as a shipping container, to house and operate the AM transmitters.

FIGURE 4 - Location of the Existing Tower at Kokea Shopping Center

The base of the existing tower contains broadcast equipment.
APPENDIX B
SAMPLE CONSULTATION LETTER
December 11, 2018

Mr. Vic Angoco, Director
Matson Navigation Company
P.O. BOX 899
Honolulu, Hawaii 96808

Dear Mr. Angoco:

Subject: Consultation for the Capstar/iHeartMedia Tower Alterations Project, Oahu
Job H.C. 10737

The Hawaii Department of Transportation (DOT) is modernizing the commercial harbors transportation system to support upgrades to replace older and obsolete gantry cranes at its Sand Island Container and the new Kapalama Container terminals. The taller gantry cranes require reducing the height of the existing radio broadcast tower (Tower) located at the corner of Dillingham Boulevard and Kokea Street in Kapalama to create an alternate flight path for commercial aircrafts departing Daniel K. Inouye International Airport under certain emergency conditions – see enclosures for details about the Project.

**Project Description.** The DOT is involved with reducing the height of the existing radio broadcast tower (Project) in the public’s interest to provide a safer flight path and to ensure the efficient flow of commerce where 80% of the cargo and 98% of these imports – food, clothing, building materials cars, fuels – are shipped by sea through Honolulu Harbor. Specifically, the height of the Tower must be lowered from its current height of 447 feet to 315 feet to reduce the impacts of a known avigational obstruction for a safer alternate flight path to accommodate certain emergency conditions.

This six (6) to eight (8) week Project requires four (4) phases to complete:

**Phase 1. Relocate the FM transmitter** equipment from the existing Tower to a new site. This will allow for the Tower to be shortened.

**Phase 2. Build a temporary AM antenna system** at an off-site location (most likely at DOT Harbor Division’s facilities) to accommodate the existing transmitter equipment for the three AM stations currently being broadcast from the existing Tower. This will allow for uninterrupted AM broadcasting during the construction activities for the shortening of the Tower.
Phase 3. Shorten the Tower, then install the new AM transmitter equipment and resume normal broadcasting. This will allow for the temporary AM antenna system to be taken off-line without disrupting the ongoing AM broadcasting. The Project goal is to complete the work before the start of the 2019 Hurricane season to allow for Oahu’s Emergency Alert System to maintain operation of its primary designated AM radio station, KSSK AM 590 kHz.

Phase 4. Restore the sites at the respective temporary AM antenna systems to original condition.

Consulting with You. With the DOT’s use of State of Hawaii general funds to finance this Project, the DOT is consulting with you as a part of its Chapter 343 environmental disclosure document to identify any potential adverse impacts this Project may cause before making a determination whether lowering the Tower from its current height of 447 feet to 315 feet can be exempted from the preparation of an environmental assessment. That is, the Project will have minimal or no significant effect on the environment.

The relevant exemption classes under Hawaii Administrative Rules, Title 11-200-8(A) are:

1. Exemption Class 1: Operations, repairs or maintenance of existing structures, facilities, equipment or topographical features, involving negligible or no expansion or change of use beyond that previously existing.

2. Exemption Class 2: Replacement or reconstruction of existing structures and facilities where the new structures will be located, generally on the same site, and will have substantially the same purpose, capacity, density, height and dimensions as the structure replaced.

3. Exemption Class 3: Construction and location of single, new, small facilities or structures and the alteration and modification of the same and installation of new, small, equipment and facilities and the alteration and modification of same.

4. Exemption Class 8: Demolition of structures, except those structures located on any historical site as designated in the National Register or Hawaii Register as provided for in the National Historic Preservation Act on 1966, Public Law 89-665, or Chapter 6E, Hawaii Revised Statues.

Additional information about this Project is available for your reference in the attached Project Description and Impact Analysis. If you have any comments, please provide them in writing, postmarked by December 21, 2018. Send comments to:

Mr. Darrell T. Young, Deputy Director, Harbors Division
Department of Transportation
79 South Nimitz Highway
Honolulu, Hawaii 96813
If you have any questions about this Project, please contact Mr. Dean Watase of our DOT Harbors Division, Engineering Special Projects Section at (808) 587-1883.

Sincerely,

JADE T. BUTAY
Director of Transportation

Enclosure
TOWER HISTORY

The Dillingham radio broadcast tower (Tower) was built in 1985 and is located at the corner of Dillingham Boulevard and Kokea Street. Capstar Radio Operating Company (CAPSTAR) leases land space from 89 Kokea Ventures to operate the Tower as an affiliate of iHeartMedia, Inc. The lease terminates on December 31, 2030. Capstar broadcasts radio programs for three AM (KSSK 590, KHVH 830 and KIKI 990) and one FM (The Beat 93.9) radio stations. Of significance, KSSK 590 is designated as Hawaii’s primary emergency alert system radio station by the Hawaii Emergency Management Agency and must remain operational at all times. Kamehameha Schools is the fee owner of the land.

89 Kokea Street, Honolulu Hawaii
PROJECT DESCRIPTION

This six (6) to eight (8) week Project will require four (4) phases to complete:

Phase 1 – Install new FM Equipment. The existing FM broadcasting component resides on the upper portion of the existing 447-foot tall Tower. Before the Tower can be shortened, new FM transmitter equipment, cabling and support structures (FM Equipment) used to operate and transmit FM broadcast transmissions will be installed to an existing antenna at the Palehua site, Palikea Ridge, which is located above Makakilo Heights. The existing Palehua site antennae supports several existing FM radio broadcast towers – see below. There is space to accommodate the new FM Equipment. After the new FM Equipment is installed and calibrated, broadcasting from this location can commence. Palehua Ranch, LLC is the fee owner of the land and Salem Radio Properties, Inc. owns the antennae.

150 Palehua Road, Palikea Ridge, Makakilo

Phase 2 – Build temporary AM antennae systems. Temporary AM broadcasting services from the Tower must be erected before construction to lower the Tower can commence. This will require establishing two temporary AM antennae systems at DOT Harbor lands located at Sand Island Annex Yard, which is located makai of the Sand Island Parkway Road, Honolulu Harbor.

Construction of two temporary AM antennae systems followed by the installation of new AM transmitter equipment, cabling and support structures (AM Equipment) to broadcast signals for three AM radio stations on each system. The Sand Island Annex temporary AM site will broadcast two AM stations simultaneously, while the Pier 19 site will broadcast one AM station. It is estimated that it will take one week to setup the system, two weeks to operate it while the Tower is shortened and one week to deconstruct the system (estimated total of 4 weeks.).

Site 1 – Sand Island Annex Yard Temporary AM Antenna System. The Sand Island Annex Yard, five existing 40-foot high light poles will be used to support the aerial component of this system. Four light poles will form the corners of a square approximately 300 feet by 300 feet,
with the fifth pole located at the center of the square. Aerial wires will be mounted from the top of the light poles at each corner to the top of the center pole, forming an "X" shaped pattern. Aerial wires will run down the center light pole and into the temporary enclosure where the transmitter equipment will be housed. The ground component of this system will consist of approximately 120 aluminum wires laid on top of the ground, each about 150 feet long, more or less, depending on the space availability at each location. The wires will be arranged in a radial pattern spreading outward from the center light pole and spaced about 3 degrees apart.

A temporary enclosure (roughly the size of an eight-foot by eight-foot container known as a G-van or similar) will be placed near the center light pole to shelter the radio transmitter equipment and its power supply. Power from the light pole will be used as the electrical source for the transmitter equipment. If no reliable power source is available, a generator will be used. After the temporary AM Equipment is installed, powered and calibrated, AM broadcast services from the temporary system will commence.

Sand Island Annex Yard, Honolulu Harbor

Site 2 – Piers 19 and 20 Cargo Yard Temporary AM Antenna System. The second AM antenna system will be at the Piers 19 and 20 Cargo Yard, which is located makai of Nimitz Highway. The Piers 19 and 20 Cargo Yard, three existing 50-foot high light poles will be used to support the aerial component of this system. Aerial wires will be mounted on the top of the light poles to the top of the center pole. Aerial wires will run down the center light pole and into the Temporary Enclosure where the AM Equipment will be housed.

The ground component of this system will consist of approximately 120 aluminum wires laid on top of the ground, each about 150 feet long, more or less, depending on the space availability at each location. The wires will be arranged in a radial pattern spreading outward from the center light pole and spaced about 3 degrees apart; however, the pattern of the ground component of this system will differ slightly from Sand Island Annex to allow for vessel operations to occur at Pier 19 and 20.
A temporary enclosure (roughly the size of an eight-foot by eight-foot container known as a G-van or similar) will be placed near the center light pole to shelter the radio transmitter equipment and its power supply. Power from the light pole will be used as the electrical source for the transmitter equipment. If no reliable power source is available, a generator will be used. After the temporary AM Equipment is installed, powered and calibrated, AM broadcast services from the temporary system will commence.

Piers 19 and 20 Yard, Honolulu Harbor

Phase 3 – Shorten the Tower and install new AM Equipment. Once the temporary AM antenna systems are operational at both locations, construction activities on the Tower can commence.

This phase includes temporarily securing the construction site around the Tower while construction activities are underway. It is anticipated that the inner parking lot will be needed and some of the outside parking as well. Once the area is secured, construction will start with the removal of the upper 135 feet of the Tower using a construction jib or crane to bring down the sections. Once the Tower is shortened and the structure is stabilized, a 54-foot diameter wheel will be installed horizontally above the wheel. In addition, a three-foot high obstruction beacon will be installed on top of the Tower bringing the total height up to 315 feet high. This beacon is a required safety feature and will be similar to the beacon that currently occupies the top of the Tower. New AM Equipment will be installed within the existing housing located at the base of the Tower. Once the new AM Equipment is calibrated, broadcast services for the three AM stations will commence.
Phase 4 – Restoring the Sites. This Phase includes removing the temporary antenna systems, removing all equipment and restoring the Sand Island Annex Yard and the Piers 19 and 20 Cargo Yard sites back to their original condition.

CONSTRUCTION PLANS

A Construction Management and Communications Plan (CMCP) will be prepared by the contractor that will establish logistical, safety and communication protocols before the Project starts construction at each site. Its objective is to ensure the safety of the public and construction personnel, and to minimize impacts to affected parties and the surrounding area. At minimum, the CMCP will:

1. Identify boundaries of each construction site.
2. Describe all construction activities that will occur at each site.
3. Identify the best work schedule that will minimize impacts to local businesses and the community.
4. Establish communications protocols to provide Project information to local businesses and the community.
5. Prepare a construction safety risk assessment and mitigation report that will identify safety issues and propose options to minimize the risks.
6. Identify construction best management practices to be used at each construction site.
7. Identify traffic controls that consider the type, frequency and route of heavy construction vehicles and cranes traversing to and from the construction sites.

In all cases, the contractor will make every effort to limit and minimize impacts to each site from vehicles and associated construction activities, including utilizing off-site parking areas for construction vehicles, workers and other traffic related considerations.

A summary of the potential impacts to the different resources are listed below:
<table>
<thead>
<tr>
<th>RESOURCE</th>
<th>PHASE 1: RELOCATE FM TRANSMITTER TO NEW SITE</th>
<th>PHASES 2 &amp; 4: BUILD AND DECONSTRUCT TEMPORARY AM ANTENNA SYSTEMS</th>
<th>PHASE 3: SHORTEN TOWER</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAND USE &amp; ZONING</td>
<td>The installation of new FM Equipment on the existing FM tower is consistent with established uses in the area.</td>
<td>The installation of temporary AM antenna system with its associated AM Equipment is consistent with established uses in the area.</td>
<td>The existing Tower is consistent with the established uses in the area.</td>
</tr>
<tr>
<td>ROADWAYS &amp; CIRCULATION</td>
<td>All construction work will be done within the footprint of the Palehua tower site, Palikea Ridge. Except for a negligible and temporary increase in traffic due to construction vehicles and mobilization/demobilization of construction equipment, no roadways or circulation will be impacted.</td>
<td>All work will be done within the Sand Island Annex Yard or the Piers 19 and 20 Yard, and all construction equipment will be stored within the yards. Except for a negligible and temporary increase in traffic due to construction vehicles and mobilization/demobilization of construction equipment, no roadways or circulation will be impacted.</td>
<td>A Construction Management and Communications Plan will be prepared to minimize and address any impacts such as temporary disruption to circulation and around the Kokea Shopping Center or the loss of parking around it.</td>
</tr>
<tr>
<td>INFRASTRUCTURE &amp; UTILITIES</td>
<td>All electrical improvements will be coordinated with HECO prior to construction to ensure the electrical system can support any increase in demand. The overall power consumed by the new FM equipment will be offset by the power no longer needed at the existing Tower. The Project will not create demand on potable water or wastewater systems.</td>
<td>All electrical improvements will be coordinated with HECO prior to construction to ensure the electrical system can support any increase in demand. The power requirements to run the temporary antenna system will be a fraction of the power requirements for the existing Tower. The Project will not create demand on potable water or wastewater systems.</td>
<td>All electrical improvements will be coordinated with HECO prior to construction to ensure the electrical system can support any increase in demand. The power consumed by the new AM Equipment will require slightly more electrical power to achieve similar signal strength. The Project will not create demand on potable water or wastewater systems.</td>
</tr>
<tr>
<td>SOCIO-ECONOMIC</td>
<td>There will be no socio-economic impacts because the site is currently used as a FM tower.</td>
<td>Approximately two acres of the Sand Island Annex Yard and the Piers 19 and 20 Yard will be needed for the temporary antenna systems and consequently will not be available for cargo operations during this period. This represents a temporary reduction in space of less than five percent of the total cargo yard area available at Sand Island.</td>
<td>A Construction Management and Communications Plan will be prepared to minimize and address any economic disruptions the Project may have to the businesses around the Kokea Shopping Center. The contractor will address any temporary business disruptions.</td>
</tr>
<tr>
<td>PUBLIC HEALTH &amp; SAFETY, PUBLIC SERVICES</td>
<td>Radio broadcast stations transmit their signals via radiofrequency (RF) electromagnetic waves. The Federal Communications Commission has established maximum permissible level for human exposure to RF at 580 microwatts per square centimeter over a 30-minute period. All applicable regulations will be followed to ensure worker and public safety.</td>
<td>Radio broadcast stations transmit their signals via radiofrequency (RF) electromagnetic waves. The Federal Communications Commission has established maximum permissible level for human exposure to RF at 580 microwatts per square centimeter over a 30-minute period. All applicable regulations will be followed to ensure worker and public safety.</td>
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<tr>
<td></td>
<td>The Palehua tower site is located in a remote area and away from residential areas. Public access to this facility is restricted so that individuals will not be exposed to RF fields that exists near antennas.</td>
<td>Surrounding uses at the Sand Island Annex Yard include the Sand Island Container Terminal to the northeast, the Sand Island Wastewater Treatment Plant to the east, the Sand Island State Recreational Area to the west and southwest, Hale Mauilola and the BMX Sandbox to the northwest. The output of both antennas is expected to be a fraction of that from the existing Tower. Public access to this facility will be restricted to limit any exposure to high-level RF fields that exists near antennas.</td>
<td>The FCC requires that the signal strength from the existing Tower be no greater than what is currently produced to avoid interference with the Monitoring Station located in Waipahu. After the existing Tower has been shortened, RF measurements will be performed and compared to the output of the pre-shortened Tower to confirm that RF levels are within the FCC guidelines.</td>
</tr>
<tr>
<td></td>
<td>Surrounding uses at the Piers 19 and 20 Yard include harbor waters to the east, warehouses to the west and commercial business to the north beyond Nimitz Highway.</td>
<td>The Palehua antennae site, Palikea Ridge, already hosts several radio</td>
<td>There are no known cultural activities at the site because the area surrounding the base of the Tower is private property and restricted to commercial activities. There will be no ground disturbing construction activities required. The existing Tower was built in 1985 and is not a historic property.</td>
</tr>
<tr>
<td></td>
<td>KSSK AM 590 is the state's designated Emergency Alert System radio station and is responsible for broadcasting emergency alerts in the event of disasters. Because the broadcasting range from the temporary antenna system will be less than the existing Tower, potentially fewer people will be able to receive an emergency alert AM signal during the approximately four-week period the temporary antenna system is in use. However, KSSK will still have its FM broadcast capabilities and other AM stations will be available.</td>
<td>The temporary antenna will consist of three visible components: the aerials on top of existing</td>
<td></td>
</tr>
<tr>
<td>CULTURAL, HISTORIC &amp; ARCHEOLOGICAL RESOURCES</td>
<td>There are no known cultural activities at the Palehua site because it is secured from public access. The Palehua site tower was built in 2000. There will be no ground disturbing construction activities required, such as trenching or grading.</td>
<td>There are no known cultural activities at the site because it is secured from public access. There will be no ground disturbing construction activities required, such as trenching or grading.</td>
<td>There are no known cultural activities at the site because the area surrounding the base of the Tower is private property and restricted to commercial activities. There will be no ground disturbing construction activities required. The existing Tower was built in 1985 and is not a historic property.</td>
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| VISUAL & AESTHETIC | The Palehua antennae site, Palikea Ridge, already hosts several radio | The temporary antenna will consist of three visible components: the aerials on top of existing | The existing Tower will be shortened from 447 feet to 315 feet high. A 54-
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<td></td>
<td>broadcast towers. The new FM Equipment will be installed on one of those existing FM towers and will not change the appearance and visual character of the site.</td>
<td>light poles, the ground radials laid on the yard surface and the housing to protect the AM Equipment. There will be no visual or aesthetic impacts to surrounding areas, which are industrial in character, because of the unobtrusive appearance and temporary nature of the antenna.</td>
<td>foot diameter sidewise wheel will be installed at the top of the Tower, which will help mitigate the loss of the height by extending the Tower sideways. The Tower has been situated at the Kokea Shopping Center for over 30 years and its lease will end 12/31/30. Shortening the Tower and the addition of the sidewise wheel will alter the look of the Tower; however, it will not change the visual and aesthetic character of this mixed commercial/industrial area.</td>
</tr>
<tr>
<td>TERRESTRIAL &amp; BENTHIC RESOURCES</td>
<td>The site is located in a wooded area. The new FM equipment will be added onto an existing operational tower, so no impacts to terrestrial flora or fauna are expected. There is no in-water work involved with this Project.</td>
<td>The site is currently a paved yard and no impacts to terrestrial flora or fauna are expected. Overhead aerial wires will be added on top of existing light poles at an elevation of 40 feet high at the Sand Island Annex Yard and 50 feet high at the Piers 19 and 20 Yard. The aerial wires will be activated but will not injure airborne wildlife that lands on them. There is no in-water work involved with this Project.</td>
<td>The site is developed with buildings and pavement covering the Kokea Shopping Center, except for vegetative landscaping features along the perimeter of the property. The Tower sits on a 10-foot high concrete podium. Once the Tower is shortened, the risk to any airborne wildlife will likely decrease because the height of the existing Tower will be shortened by 132 feet. There is no in-water work involved with this Project.</td>
</tr>
<tr>
<td>NOISE</td>
<td>There may be short-term, low-level construction noise associated with the installation of the new FM equipment. If the noise emissions are above standards stipulated in Hawaii Administrative Rules, Title 11-46, a permit will be required regulating the permissible noise levels.</td>
<td>There may be short-term, low-level construction noise associated with the installation of the temporary AM antenna and equipment. The emergency generator may increase noise levels during power outages. If the noise emissions are above standards stipulated in Hawaii Administrative Rules, Title 11-46, a permit will be required regulating the permissible noise levels.</td>
<td>There may be short-term, low-level construction noise associated with shortening the Tower and the installation of the new AM equipment. If the noise emissions are above standards stipulated in Hawaii Administrative Rules, Title 11-46, a permit will be required regulating the permissible noise levels.</td>
</tr>
</tbody>
</table>
APPENDIX C
COMMENT LETTERS
December 19, 2018

Mr. Darrell T. Young, Deputy Director, Harbors Division
Department of Transportation
79 South Nimitz Highway
Honolulu, Hawaii 96813

Dear Mr. Young:

    The Department of Emergency Management for the City and County of Honolulu has no comment regarding the Consultation for the Capstar/iHeartMedia Tower Alterations Project, Oahu, Job H.C. 10737.

Thank you for the opportunity to review and comment.

Sincerely,

Hirokazu Toiya
Acting Director
From: Dichner, Michael L  
Sent: Wednesday, December 19, 2018 2:00 PM  
To: Underwood, Ed R  
Cc: Watase, Dean  
Subject: RE: DOT-Harbors Consultation Letter, Dillingham Radio Tower

Ed,
Mahalo for your input and your speedy response. A hard copy of the letter and attachment have already been mailed and you should be receiving it in the next day or two, but there’s no need to respond a second time unless you see fit.

Best Regards
Michael Dichner

State of Hawaii - Dept. of Transportation
Harbors Division - Planning Section
79 S. Nimitz Hwy. / Honolulu, HI 96813-4898
Phone: 808.587.1885 / Fax: 808.587.2504
E-mail: michael.l.dichner@hawaii.gov

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From: Underwood, Ed R  
Sent: Wednesday, December 19, 2018 9:31 AM  
To: Dichner, Michael L <michael.l.dichner@hawaii.gov>  
Subject: RE: DOT-Harbors Consultation Letter, Dillingham Radio Tower

Aloha Michael,

I concur that your proposed project meets the exemption requirement for Chapter 343.

Thanks,

Ed

Edward R. Underwood, Administrator
4 Sand Island Access Road
Honolulu, HI 96819
(808)587-1966

From: Dichner, Michael L  
Sent: Tuesday, December 18, 2018 8:00 AM  
To: Underwood, Ed R <ed.r.underwood@hawaii.gov>  
Subject: DOT-Harbors Consultation Letter, Dillingham Radio Tower  
Importance: High

Aloha Ed,
We apologize for such late notice, but we would appreciate your assistance on an important matter. DOT is considering a HRS 343 Exemption and are currently doing consultations. The attached letter and technical description have the details. We had originally mailed this letter to you in early December but it was returned as undeliverable. A new letter has been sent to you at an updated address, and this email is to let you know that there's been a delay in correspondence and to give you some extra time to respond. Again, we apologize for such late notice and greatly appreciate your input.

Mahalo Nui Loa,
Michael Dichner

State of Hawaii - Dept. of Transportation
Harbors Division - Planning Section
79 S. Nimitz Hwy. / Honolulu, HI 96813-4898
Phone: 808.587.1885 / Fax: 808.587.2504
E-mail: michael.l.dichner@hawaii.gov

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December 20, 2018

Mr. Jade T. Butay, Director
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Butay:

SUBJECT: Capstar/iHeartMedia Tower Alterations Project
1095 Dillingham Boulevard - Kapalama
Tax Map Key 1-5-020: 003

This responds to your letter, received on December 13, 2018, regarding the proposed replacement of the existing broadcast antenna located at the above site. Specifically, you are consulting with us to identify any potential adverse impacts related to lowering the subject broadcasting antenna tower from 447 feet to 315 feet. This information will aid you in determining whether the Project is exempt from the preparation of an Environmental Assessment, under Chapter 343, Hawaii Revised Statutes. We understand the Project is likely to take six to eight weeks and your goal is to complete it prior to the start of the 2019 hurricane season, which will allow Oahu's Emergency Alert System to maintain operation of its primary designated AM radio station. We have not identified any adverse impacts to the environment that would result from the Project and concur that lowering the height of the tower appears to fit under several environmental disclosure document exemption classes.

The subject site is in the IMX-1 Industrial Mixed Use District and has a height limit of 150 feet. In the IMX-1 District, broadcasting antennas are conditional uses. As such, new broadcasting antenna facilities require a Major Conditional Use Permit (CUP). Because the existing 447-foot-high antenna was constructed in 1985, prior to the effective date of the Land Use Ordinance (LUO), it is considered a nonconforming use. Reducing its height will not increase the nonconformity, so we will not require a CUP or an Existing Use Permit at this time. Furthermore, broadcasting antennas are allowed to be up to 500 feet in height, pursuant to LUO Section 21-4.60(c)(4)(A). Therefore, the proposed final height of 315 feet is acceptable.
The subject site is outside of the Special Management Area. It is across Kokea Street from the Kapalama Canal, which is considered an E1UBL Estuarine and Marine Deep-water. However, the Federal Emergency Management Agency Flood Insurance Rate Maps identify the area as Flood Zone X, meaning the area has minimal flood hazards. Our records do not show any historic sites in the vicinity of the Project. Therefore, based on the information available to us, we have determined that lowering the height of the tower is unlikely to have adverse impacts to the environment.

Should you have any questions, please contact Steve Tagawa, of our staff, at 768-8024.

Very truly yours,

Kathy K. Sokugawa
Acting Director

cc: Land Division –DLNR
    Environmental Health - DOH
Dear Sirs:

SUBJECT: Consultation for the CAPSTAR/iHEARThMEDIA Tower Alterations Project, Oahu; Job H.C. 10737; Reference HAR-EP 0723.19

Thank you for the opportunity to review and comment on the above subject. The Land Division of the Hawaii Department of Land and Natural Resources ("DLNR") distributed copies of your request to DLNR’s Divisions for their review and comments.

At this time, attached is a returned form on the subject matter received from our Land Division - Oahu District, which had no comments. No other responses were received by the January 3, 2019 due date. Should you have any questions, please feel free to contact Barbara Lee at (808) 587-0453. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files
TO: DLNR Agencies:
   ___ Div. of Aquatic Resources
   ___ Div. of Boating & Ocean Recreation
   ___ Engineering Division
   ___ Div. of Forestry & Wildlife
   ___ Div. of State Parks
   ___ Commission on Water Resource Management
   ___ Office of Conservation & Coastal Lands
   ___ Land Division -- Oahu District
   ___ Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Consultation for the Capstar/iHeartMedia Tower Alternations Project

LOCATION: Island of Oahu; TMKs: (1) 9-2-005:024, 1-5-041:022, 1-5-039:007 & 1-5-020:003

APPLICANT: Department of Transportation, Harbors Division

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments by January 3 2019.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

(  ) We have no objections.
(  x  ) We have no comments.
(  ) Comments are attached.

Signed: [Signature]
Print Name: [Name]
Date: [Date]

Attachments
cc: Central Files
January 10, 2019

The Honorable Jade T. Butay, Director  
Department of Transportation  
869 Punchbowl Street  
Honolulu, HI 96813-5097

Dear Sirs:

SUBJECT:  Consultation for the CAPSTAR/iHEARTMEDIA Tower Alterations Project, Oahu; Job H.C. 10737; Reference HAR-EP 0723.19; Additional Comments

Thank you for the opportunity to review and comment on the above subject. In addition to our previous response dated January 7, 2019, attached are comments received on January 9, 2019, for the Department of Land and Natural Resources from our Engineering Division. Should you have any questions, please feel free to call Barbara Lee at (808) 587-0453. Thank you.

Sincerely,

Russell Y. Tsuji  
Land Administrator

Enclosure(s)  
cc: Central Files  
xc via email: Dean Watase
December 20, 2018

MEMORANDUM

TO: DLNR Agencies:
   _ _ Div. of Aquatic Resources
   _ _ Div. of Boating & Ocean Recreation
   X Engineering Division
   X Div. of Forestry & Wildlife
   X Div. of State Parks
   X Commission on Water Resource Management
   X Office of Conservation & Coastal Lands
   X Land Division – Oahu District
   X Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Consultation for the Capstar/iHeartMedia Tower Alternations Project
LOCATION: Island of Oahu; TMKs: (1) 9-2-005:024, 1-5-041:022, 1-5-039:007 & 1-5-020:003

APPLICANT: Department of Transportation, Harbors Division

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments by January 3 2019.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

( ) We have no objections.
( ) We have no comments.
(✓) Comments are attached.

Signed: [Signature]

Print Name: Carty S. Chang, Chief Engineer
Date: 1/1/19

Attachments
cc: Central Files
The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA’s Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (http://gis.hawaiinfip.org/FHAT).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- **Oahu**: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- **Hawaii Island**: County of Hawaii, Department of Public Works (808) 961-8327.
- **Maui/Molokai/Lanai**: County of Maui, Department of Planning (808) 270-7253.
- **Kauai**: County of Kauai, Department of Public Works (808) 241-4846.

Signed: CARTY S. CHANG, CHIEF ENGINEER

Date: 1/1/19

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji
Ref: Consultation for the Capstar/iHeartMedia Tower Alterations Project, Island of Oahu; TMKs: (1) 9-2-005:024, 1-5-041:022, 1-5-039:007 & 1-5-020:003