March 29, 2021

Dr. Keith Kawaoka, Acting Director
State of Hawai‘i, Department of Health
Office of Environmental Quality Control
235 South Beretania Street, Room 702
Honolulu, Hawai‘i 96813

Subject: 2021 Fall Football Season Alternate and Enhanced Operations Capacity at the University of Hawai‘i at Mānoa (UHM) Lower Campus by Increasing Spectator Capacity at the Clarence T.C. Ching Complex (Ching Complex) from 2,100 to 10,000.

Chapter 343, Hawai‘i Revised Statutes (HRS), Compliance – Determination of No Additional Environmental Review Required

Dear Dr. Kawaoka:

Pursuant to Section 11-200.1-11, Hawai‘i Administrative Rules (HAR), this letter serves as notification and a request for publication in the next issue of The Environmental Notice that the University of Hawai‘i (UH) has determined that additional environmental review is not required for the subject Proposed Action, as more fully described below.

Project Setting:
The main UHM campus occupies approximately 305 acres of land situated in lower Mānoa Valley, bounded by the Mānoa, St. Louis Heights, Mō‘ili‘ilī and McCully communities. Its principal physical borders are the Mānoa residential community on the mauka side, Wa‘ahila Ridge on the Koko Head side, H-1 Freeway on the makai side and lower Mānoa, Mō‘ili‘ilī and McCully residential communities on the ‘Ewa side.

The Project Site for the Proposed Action is located on the UHM Lower Campus, on an approximately 88.16 acre Tax Map Key (TMK) Parcel identified as TMK No. (1) 2-8-029:001 (Parcel 1). The Ching Complex occupies approximately 2.5-acres of the subject TMK parcel.

The UHM Lower Campus is located mauka of the H-1 Freeway, east of University Avenue, and makai of Dole Street. The Ching Complex includes a three-story, approximately 47,788-square-foot, LEED Gold Certified facility surrounded by the Lower Campus Parking Garage, the UH Tennis Complex, Rainbow Wahine Softball Stadium, Practice Fields, Les Murakami Baseball Stadium, Duke Kahanamoku Aquatic Complex, and the Athletics Office Complex. The Ching Complex supports a wide variety of activities and events as the only on-campus all-purpose track and field, football, soccer, beach volleyball and recreational facility which currently provides grandstand seating for approximately 2,100 fans for the track and field. The total seating for the track and field events, including the makai bleachers, seats approximately 3,500. The interior of the building features offices, locker rooms and a meeting room for women’s soccer, cross country, track and field, and beach volleyball. The complex also features a beach volleyball venue with 778 seats and two competition courts.
The UHM's primary vehicular access points are from the H-1 Freeway, University Avenue, Dole Street and Old Wai'alae Road. Public transportation is primarily provided by regular bus services on King Street, University Avenue, Dole Street and Metcalf Street. The bus service includes routes through the UHM campus via East-West Road and Maile Way. The UHM campus is also served by direct express bus service from the outlying communities.

Project Description/Proposed Action:
The Proposed Action includes the following improvements required for the hosting of football games at the Ching Complex for the 2021 Fall season:

1. **Grandstand and Hospitality Structure Additions.**
   The Proposed Action includes the removal of existing temporary seating along the makai sideline of the Ching Complex and relocation to the 'Ewa endzone. The makai sideline seating will be replaced with a grandstand for the 2021 season, with a seating capacity of approximately 3,400. Contingent on the availability of funding, a hospitality structure would also be added behind the grandstand, with a seating capacity of approximately 420, with a height of approximately 28 feet. Contingent on funding, grandstand(s) will also be added to the Diamond Head side of the field behind the goalposts, providing an additional 2,000 seats. The Diamond Head grandstand will extend to a height of approximately 32 feet.

2. **Pre-fabricated Press Boxes.**
   The Proposed Action includes installing six (6) pre-fabricated, press boxes, including necessary telecom improvements, with three on each side of the existing press box to existing bleachers on the mauka side of the field. These structures will be one-story and approximately 9 feet in height.

3. **New Scoreboards.**
   Scoreboard elements consist of replacing the ‘Ewa scoreboard and columns with a new LED video scoreboard (7 feet x 24 feet), columns, and sound system. Contingent on funding, if a new grandstand is added to the ‘Ewa side of the field behind the goalposts, the new scoreboard and sound system would be mounted above the new ‘Ewa grandstand for visibility.

4. **Staging Areas for Visiting Team Storage Containers.**
   Equipment storage containers shipped by visiting teams will be temporarily staged near or adjacent to Les Murakami Baseball Stadium and near the Stan Sheriff Center (each container measuring 40 feet long by 8 feet wide by 8-9 feet high).

5. **Concessions and Merchandising.**
   Temporary concession and merchandising booths will be added around the field. They will be one-story temporary structures.

6. **Restroom Facilities.**
   Approximately 37 portable toilets and seven (7) sinks will be added around the field.

7. **Bridge from PE/Athletics Complex.**
   Construction of a bridge connecting the hospitality suite (behind the makai grandstand) to the second floor of the adjacent PE/Athletics Complex for accessibility.

Prior Exemptions and Findings of No Significant Impact Applicable to the Proposed Action:
In accordance with guidance set forth under Section 11-200.1-11, HAR, the UH reviewed its records of relevant prior Chapter 343, Hawai'i Revised Statutes (HRS) exemptions and approved findings of no significant impact (FONSI) that have logical relevancy and bearing to the UHM Lower Campus and this Proposed Action which include:
UHM is proposing to renovate the Ching Complex in order to host Football games for the 2021 Fall Season, subject to the following conditions:

• The Stan Sheriff Center and the Ching Complex will each have the same maximum capacity of approximately 10,000 spectators.
• UHM will not hold simultaneous events at the Stan Sheriff Center when the Ching Complex will be used to host Football games.
• Both facilities are in close proximity to one another and will be operated within existing infrastructure capacity limits and similar protocols for managing vehicular and pedestrian traffic.
• All modifications to the Ching Complex will be within its existing footprint and consistent with the character of the surrounding environment in terms of massing and height.
• Both facilities have similar uses that cater to athletic programs and audiences and any proposed uses will not constitute a change in character or use of Lower Campus or the facilities themselves.

When operating under these restrictions and mitigating conditions, the Proposed Action is anticipated to have direct, indirect, and cumulative effects similar to those previously analyzed under prior Final-EA FONSIIs, as completed pursuant to Chapter 343, HRS, and identified above.

Overall, it is acknowledged that the Proposed Action will increase the seating capacity of the Ching Complex to approximately 10,000 spectators. However, the proposed 10,000 spectator capacity for the Ching Complex is comparable to the existing capacity of the adjacent Stan Sheriff Center. UH will manage Lower Campus operations to limit spectator capacity to a total of 10,000 on days that the Ching Complex will be used to host UH Football Games by not simultaneously hosting an event in the Stan Sheriff Center. Consequently, although the on-paper, aggregate seating capacity of all Lower Campus facilities will be expanded, there will be no new or increase in intensity of use of Lower Campus facilities from a programming and operations standpoint, and impact on the campus and surrounding community will remain consistent with the current status quo.

UH regularly hosts other large spectator events, such as graduations and other sporting events throughout the year and it is anticipated that the hosting of football events at the expanded Ching Complex would be substantially similar in nature in terms of regional traffic, parking, and noise impacts. Mitigation measures to address these impacts are articulated and outlined in prior environmental review processes, and will likewise carry over and apply to Proposed Action operations. It is anticipated that the same Traffic Demand Management strategies, and Traffic Management Plans that have been developed for large spectator events hosted at the Stan Sherriff Center would be applicable to the re-allocation of Lower Campus capacity to the Ching Complex on the days that UH football games are scheduled.

CONSULTATION:
The Project Team has reached out to the Mānoa, McCully-Mōʻiliʻili, Diamond Head-Kapahulu-St.Louis Heights, and Kaimuki Neighborhood Boards to solicit feedback and gauge community concern on the hosting of UH Football games at the Ching Complex. In general, participants raised discussion regarding potential traffic, parking, and noise impacts from the hosting of football games on the UHM Lower Campus. The University has also coordinated with the City on necessary permitting requirements for the project.
For the purposes of this Proposed Action, these concerns are addressed in the above referenced Chapter 343, HRS, environmental review documents.¹

**DECLARATION OF DETERMINATION:**

Pursuant to Section 11-200.1-11, HAR, based on the above, the UH determines that additional environmental review is not required for the Proposed Action because:

1. The Proposed Action was a component of, or is substantially similar to, actions that received an exemption or FONSI as those documents are cited and referenced herein;
2. The Proposed Action is anticipated to have direct, indirect, and cumulative effects similar to those analyzed in a prior exemption and final environmental assessment as those documents are cited and referenced herein; and
3. The Proposed Action was analyzed within the range of alternatives in the final environmental assessment documents cited and referenced herein.

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Signature of Director or Delegate  Date

☒ This document is on file in our office and is available for public review.
☒ This document has been submitted to the Office of Environmental Quality Control for publication in *The Environmental Notice.*

¹ Any expansion of uses to Lower Campus, such as operating Ching Complex and Stan Sheriff Center simultaneously, would require separate environmental review under Chapter 343, HRS, and further approvals from the City and County of Honolulu.