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FINAL ENVIRONMENTAL IMPACT STATEMENT

FOR THE PROPOSED

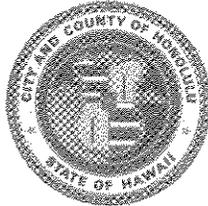
PUNALUU SHORES PROJECT

Punaluu, Koolauloa District, Island of Oahu

APRIL 1981

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813 • (808) 523-4411



EILEEN R. ANDERSON
MAYOR

MICHAEL M. MCELROY
DIRECTOR

80/SMA-78(SM)

May 6, 1981

Mr. Donald Bremner, Chairman
Environmental Quality Commission
State of Hawaii
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Mr. Bremner:

Revised Environmental Impact Statement (EIS)
Punaluu Shores Project
W & C Ltd. and Walter S.S. Zane

We are notifying you of our acceptance of the above as an adequate fulfillment of Ordinance No. 4529, as amended.

The following information and correction, regarding the description on drainage and the capacity of the injection wells, has been provided by the agent upon the request of the Department of Land Utilization:

1. The statements made on Pages 6 and 19 of the Final EIS relating to stormwater runoff being discharged into Punaluu Stream were incorrect. Stormwater runoff from the proposed site will be discharged into the drainage ditch. The drainage ditch is located on the Kaneohe side of the property and runs mauka-makai, discharging into an existing highway culvert. The drainage ditch is owned by Bishop Estate and the developer has received approval from the Estate to clear the ditch so that it will be more effective. Subsequently, the stormwater runoff will not be discharged into Punaluu Stream which lies on the Kaneohe side of the property at a distance of approximately 1200 feet.

Mr. Donald Bremner, Chairman
Page 2

2. The sewage treatment plant consultant stated that the injection well will readily absorb 92 gallons of water per minute. In the testing, only 92 gallons of water per minute was available, thus, the 92 gallons per minute absorption is not necessarily the maximum. Given the size of the sewage treatment plant, 30,000 gallons per day, the injection well will have more than adequate capacity for the sewage effluent.

The landowner has been notified that the Chief Planning Officer of the City and County Department of General Planning will initiate a change in land use of the project site on the Detailed Land Use Map (DLUM) from hotel/residential use to residential use. This DLUM amendment will be brought to the Planning Commission for public hearing in late May, 1981. A rezoning of the H-1 Hotel District lands will subsequently follow. We are transmitting a copy of this letter to the applicant.

Should you have any questions regarding this matter, please contact Sampson Mar of our staff at 523-4077.

Very truly yours,



MICHAEL M. McELROY
Director of Land Utilization

MMM:sl

May 6, 1981

ACCEPTANCE REPORT: ENVIRONMENTAL IMPACT STATEMENT (EIS)
PUNALUU SHORES PROJECT
W & C LTD. AND WALTER S.S. ZANE

A. Background

The EIS was prepared for W & C Ltd. and Walter S.S. Zane by Environmental Communications, Inc. This document describes the anticipated environmental impacts of the development of the Punaluu Shores Project on the Special Management Area including the construction of a 7-story, 2-wing hotel with a total of 102 units; 54 units will be lodging units (studio-type with no kitchen facilities) and 48 will be two-bedroom units (with kitchen facilities). Internal roadways and ground-level parking will be provided for 106 vehicles. Recreational and open spaces, swimming pool, landscaping and the necessary infrastructure, including a private sewage treatment plant will also be provided.

The proposed project lies entirely within the Special Management Area, as defined by Ordinance No. 4529, as amended. Accordingly, the project was assessed by the Department of Land Utilization (DLU), and an EIS was required of the applicant.

B. Procedures

1. The DLU issued an EIS Preparation Notice, which appeared in the "EQC (Environmental Quality Commission) Bulletin" of October 23, 1980 under the Register of Shoreline Protection Act Documents. This was distributed to all interested Federal, State, and City and County agencies, as well as public officials, community organizations, and private citizens.
2. Comments from consulted parties were received until February 2, 1981, allowing all parties the required 30-day minimum consultation period. Sixteen (16) parties submitted written comments during this period; thirteen (13) commenting letters required written responses, which were made by the applicant.
3. The Draft EIS was received and distributed by the DLU on March 6, 1981. The deadline for the public review period was then set for April 6, 1981. A list of reviewers is attached.

4. The applicant made a point-by-point response to all substantive comments received, within the 14-day response period.

C. Content

The following information and correction, regarding the description on drainage and the capacity of the injection wells, has been provided by the agent upon the request of the Department of Land Utilization:

1. The statements made on Pages 6 and 19 of the Final EIS relating to stormwater runoff being discharged into Punaluu Stream were incorrect. Stormwater runoff from the proposed site will be discharged into the drainage ditch. The drainage ditch is located on the Kaneohe side of the property and runs mauka-makai, discharging into an existing highway culvert. The drainage ditch is owned by Bishop Estate and the developer has received approval from the Estate to clear the ditch so that it will be more effective. Subsequently, the stormwater runoff will not be discharged into Punaluu Stream which lies on the Kaneohe side of the property at a distance of approximately 1200 feet.
2. The sewage treatment plant consultant stated that the injection well will readily absorb 92 gallons of water per minute. In the testing, only 92 gallons of water per minute was available, thus, the 92 gallons per minute absorption is not necessarily the maximum. Given the size of the sewage treatment plant, 30,000 gallons per day, the injection well will have more than adequate capacity for the sewage effluent.

The revised EIS meets all of the procedural requirements of Ordinance No. 4529, as amended.

D. Response

The applicant made adequate point-by-point responses to all comments, and included them in the Revised EIS.

E. Determination

The Revised EIS is determined to be acceptable under the procedures established in Ordinance No. 4529, as amended. The applicant should be aware that the Chief Planning Officer of the City and County Department of General Planning will initiate a change in land use of this project site on the Detailed Land Use Map (DLUM) from hotel/residential use to residential use. This action will be before the Planning Commission in late May, 1981. A rezoning of the H-1 Hotel District lands will subsequently follow.

This determination in no way implies a favorable recommendation on the applicant's request for any subsequent permits required by this department for this project, where applicable.

APPROVED



MICHAEL M. McELROY
Director of Land Utilization

MMM:sl

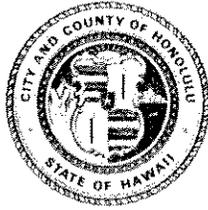
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PUNALUU SHORES PROJECT
AGENCIES RESPONDING TO THE DRAFT EIS

<u>Agency</u>	<u>Date of Comment</u>	<u>Date of Response</u>
<u>Agencies Having No Comments</u>		
Department of Agriculture	1/14/81	--
U.S. Department of the Interior, Fish and Wildlife	3/17/81	--
Department of Defense	3/19/81	--
Department of Housing & Community Development, City & County of Honolulu	3/16/81	--
Department of Transportation, State of Hawaii	4/03/81	--
Building Department, City & County of Honolulu	3/12/81	--
<u>Agencies With Comments</u>		
Honolulu Police Department	3/13/81	4/01/81
Board of Water Supply	3/19/81	4/01/81
Department of Public Works	3/23/81	4/01/81
Fire Department	3/23/81	4/01/81
Hawaiian Electric Company, Inc.	3/23/81	4/01/81
Department of Education, State of Hawaii	3/24/81	4/08/81
Department of Health, State of Hawaii	3/25/81	4/21/81
Department of General Planning City & County of Honolulu	3/27/81	4/21/81
Water Resources Research Center, University of Hawaii at Manoa	3/31/81	4/21/81
Environmental Center, University of Hawaii at Manoa	4/01/81	4/21/81
Department of Planning & Economic Development, State of Hawaii	4/01/81	4/21/81
Hawaiian Telephone Company	4/01/81	4/21/81
Office of Environmental Quality Control, State of Hawaii	4/02/81	4/21/81
Life of the Land	4/02/81	4/21/81
Punaluu Community Association	4/02/81	4/21/81
Department of Land Utilization, City & County of Honolulu	4/06/81	4/21/81

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CITY AND COUNTY OF HONOLULU

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EILEEN R. ANDERSON
MAYOR

MICHAEL M. McELROY
DIRECTOR

80/SMA-78(SM)

May 6, 1981

Gentlemen:

Revised Environmental Impact Statement (EIS)
Punaluu Shores Project

Enclosed is an errata sheet for the following pages in the Revised EIS for the above project:

1. Page 6, Subsection 2.6, Item (c)
2. Page 19, Subsection 5.5, Item (a), last paragraph in subsection
3. Page 22, Subsection 5.7., Item (b)

This data should be appended to the Final EIS for your information and use.

If there are any questions please, contact Sampson Mar of our staff at 523-4077.

Very truly yours,

A handwritten signature in cursive script, reading "Michael M. McElroy".

MICHAEL M. McELROY
Director of Land Utilization

MMM:sl

100 4-135
May 1, 1981

FINAL EIS FOR THE PROPOSED PUNALUU SHORES PROJECT

ERRATA SHEET

Page 6 Subsection 2.6, Item (c)

Reads: "This plan was previously approved and consists of discharging surface water (falling on the roofs and parking areas) near an existing culvert (next to Kamehameha Highway) so that the runoff will go into the culvert and be discharged in Punaluu Stream, 800 feet down from the Highway."

Should read: This plan was previously approved and consists of discharging surface water (falling on the roofs and parking areas) into an existing drainage ditch which drains into a highway culvert.

Page 19 Subsection 5.5, Item (a), last paragraph in subsection

Reads: "The storm runoff not absorbed into the ground will be discharged into Punaluu Stream, 800 feet from the shoreline."

Should read: The storm runoff will be discharged into an existing drainage ditch on the Kaneohe side of the property. The drainage ditch, which runs mauka-makai, is owned by the Bishop Estate; the developer has obtained permission to clear the ditch. The runoff in the ditch, and subsequently from the project, flows into an existing highway culvert.

Page 22 Subsection 5.7, Item (b)

Add: The sewage treatment plant have a capacity of 30,000 gallons per day. The injection well located adjacent to the Kaneohe side ingress/egress (on the property site) has been tested. Percolation tests indicate that water can be absorbed at a rate greater than 92 gallons per minute. This will be more than adequate for the sewer drainage generated by the sewer treatment plant.

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1. SUMMARY

Project Name: Punaluu Shores

Agency Action: The project site lies within the Special Management area (Ordinance 4529, City and County of Honolulu). A Shoreline Management Permit Application must be submitted to the Department of Land Utilization, City and County of Honolulu; an accepted EIS document is required (as determined by the Department of Land Utilization) as part of the application submittal.

Accepting Authority: Department of Land Utilization, City and County of Honolulu

Location: In Punaluu, adjacent and mauka of Kamehameha Highway, Puuheemiki, Koolauloa District, Oahu

Project Size: 77,029 square feet (1.768 acres)

Site's Address: 53-382 Kamehameha Highway

Tax Map Key: 5-3-05:2 and 38

Zoning: 1.3± acres zoned H-1 Resort Hotel (identified as TMK 5-3-05:38) and 0.47± acres zoned R-6 Residential District (identified as TMK 5-3-05:2)

Applicant, Owner, and Developer: W & C Ltd.
Walter S.S. Zane

Architect: James K. Tsugawa, AIA & Associates
Kawaihao Plaza

Environmental Consultants: Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809
Telephone: 521-8391

Project Description: The applicant proposes to construct a 7-story, 2-wing hotel having a total of 102 units. Of this total, 54 units will be lodging units (studio-type with no kitchen) and 48 will be two-bedroom units. All units will be sold as condominium units. It is anticipated that the two-bedroom units will be used primarily as a vacation home by their owners. One hundred six parking spaces will be provided. A sewage treatment plant, located within the R-6 zoned parcel will be constructed and will treat sewage from the project site. Recreational spaces, landscaping, and open space will be provided.

Probable Environmental Impacts: (1) Impact on the physical environment is not anticipated to be significant or

adverse. The physical environment includes geology, soils, climate, flora and fauna.

- (2) Economic impacts will include a significant increase in the income generation of the project site, taxes paid to the State and County via property taxes, sales and income taxes (of temporary construction workers and later, permanent employees). No governmental monies will be directly used for the development of the proposed project. It is estimated that permanent jobs equivalent to ten (10) full-time employees will be created by this project. The value of the surrounding properties will likely increase because of the use of the project site for a hotel-condominium.
- (3) The project will increase the population of the Punaluu area by an estimated 306 persons. This represents an increase of less than 5 percent of the 1980 population now living between Hauula to Kaaawa. (For which official population statistics are available.) The Punaluu Community Association and the Koolauloa Neighborhood Board #28 have indicated (letter commenting on the EIS Preparation Notice) that they oppose resort development in Punaluu.
- (4) As indicated by the Department of General Planning (letter commenting on the EIS Preparation Notice for this project), the present Detailed Land Use Map (DLUM) allow a much greater intensity of urbanization that is prescribed by the current General Plan. The project is consistent with the State and County's land use designation and zoning. The proposed Development Plan does not coincide with the present DLUM and zoning of the project parcel.
- (5) Existing infrastructure, e.g. water, highway, electricity, and governmental services are available and can adequately accommodate the proposed project. A sewage treatment plant will be provided on-site by the developer.

2. PROJECT DESCRIPTION

The Punaluu Shores project was initiated in 1973. From 1973 through 1976, various approvals and permits were obtained for the proposed project (including a Conditional Use Permit, State Department of Health approval for the sewage treatment plant, Consolidation approval, Stockpiling Permit, Grading Permit, and Building Permit). In 1977, when the project site was cleared and some on-site work completed, poor market conditions were encountered and site work was discontinued. Because of the three year lapse, the applicant, wishing to build the same project, must now resubmit these plans to various agencies for their review and approval.

This Draft EIS has been prepared as an applicant action for Determination of Requirements under Ordinance 4529, City and County of Honolulu, relating to an Interim Shoreline Protection District for Oahu. The entire site lies within the Shoreline Management Area (SMA). The approving agency for this EIS is the Department of Land Utilization, City and County of Honolulu.

2.1 Statement of Objectives. The applicant proposes to build a 7-story hotel on the 1.768-acre site. A total of 102 units will be provided, 54 lodging units (i.e. hotel rooms) and 48, two-bedroom condominium units which will be sold to buyers for a vacation type residence. The primary objective of the project is to more fully utilize the present Detailed Land Use Map designation (Hotel) and zoning (H-1) of the site. The consolidation of the existing parcels by the applicant will achieve the "highest and best use" of the property under existing governmental land use regulations. Future residents and hotel users will be provided with benefits in form of housing, convenient access to the beach, scenic views, and living within a "quiet" rural setting. This type of hotel/condominium use is felt to satisfy the need for families and individuals who desire this secluded type of environment.

Benefits will accrue to the community in terms of additional sales to visitors. The addition of 306 visitors need not "destroy" the present rural setting. In many cases, the visitors will be sightseeing on other parts of the Island or may be resting in their hotel unit or along the beach. Subsequently, the activities of the visitors should not be conspicuous or deleterious to the existing community or environment.

2.2 Technical Characteristics.

- (a) The building plans call for a total floor area of 80,800 square feet. The maximum allowable under the Comprehensive Zoning Code is 80,844 square feet (based on the portion of the site zoned H-1 which is 57,746 square feet).
- (b) The 48, two-bedroom units, will be single loaded in wing A (shown on Figure 2, Site Plan); each unit will have 763 square feet of floor space. The 54 lodging units will be double loaded in Wing B of the proposed building. Each of these units will have 450 square feet of floor space. The lodging units will not have kitchens. The two-bedroom units will include kitchen facilities. No central or unit air-conditioning will be provided.

- (c) A sewage treatment plant (see Exhibit 1 for a description of the plant and type of treatment provided) will be constructed on-site. The design capacity is 30,000 gpd (gallons per day); this will adequately accommodate the sewage generated by this project. The location of the sewage treatment plant is shown on Figure 2, Site Plan. The plant will be approximately 200 to 300 feet from the nearest surrounding residential and commercial structures.
- (d) A total of 106 parking spaces will be provided. These parking spaces are all located at ground level. The total parking spaces will exceed the Comprehensive Zoning Code requirements. (The CZC requires 101 parking spaces.) A total of three loading zones will also be provided; this is consistent with the CZC.
- (e) The height of the hotel will be 60.5 feet. Although the building will be seven stories high, the first (or ground level) will consist of parking, the remaining six floors will consist of living units. In wing A, there will be eight, two-bedroom units per floor; in wing B, there will be nine lodging units per floor.
- (f) Recreational spaces and a swimming pool for residents and their guests will be provided. Landscaping will also be provided in and around the project site (as indicated in Figure 2). Landscaping material will include coconut palms, beach oriented plants, ornamental plants, flowering plants, as well as shrubs and grasses. The specific types of plants selected will depend on their suitability to the environment. The 15-foot strip of land between Kamehameha Highway and the project boundaries will also be landscaped with permission by the State Department of Transportation. This will enhance the frontage of the project site.
- (g) Two, 22-foot wide ingress/egress points to Kamehameha Highway are proposed. The parking area will consist of asphaltic pavement. Circulation within the parking area will be limited. The ingress/egress on the Kahuku-end of the property will serve about 35 percent of the parking spaces and the loading zone for the hotel. The second ingress/egress will provide access to the remaining parking spaces and the proposed sewage treatment plant (STP).
- (h) The proposed building will be set back 56 feet from the property line (which is not adjacent to the highway). The property line begins approximately 15 feet from the highway's pavement. The parking spaces (for the project) are located 25 feet from the property line.
- (i) At this time, no energy saving devices are planned to be incorporated. No air-conditioning units or central air will be included; the architectural consultant found that even in the double loaded Wing B, there is sufficient natural ventilation provided via open windows.
- (j) Presently, no food service area or restaurant is proposed;

depending on the demand a small food service area may be included for the residents and hotel guests.

- (k) No walls around the project site are included in the project plans.

2.3 Economic Characteristics. The estimated cost of the proposed project is \$5 million. This does not include land costs or the cost of the sewage treatment plant (estimated at \$900,000.00). The selling cost of the two-bedroom units and the rental cost of the lodging units has not yet been determined. It is anticipated that the costs will be commensurate with similar housing in the surrounding area (at the time the units are marketed).

During the Draft EIS review period, the question of time-sharing was addressed (Department of General Planning, March 27, 1981); also that some owners may choose to "pool" their units for hotel rental (Punaluu Community Association). In discussing these aspects with the developer, he noted that while the final marketing plan has not been determined, the units will be sold, and the use of that unit determined by the private owner(s). The private owner must comply with the applicable laws. Subsequently, time-sharing and a hotel "pool" are possibilities; this would not be unlike a hotel operation in terms of visitors and occupancy. Further purchasers would most likely be local individuals who would use the unit for a vacation home.

Private monies will be used to construct the proposed project; no governmental funds will be used.

2.4 Social Characteristics. Because of the hotel and condominium use of the proposed building, it is difficult to predict the people occupying the project at any one time. If occupancy averaged three persons per unit, the total population on the project site would be 306.

2.5 Environmental Characteristics.

- (a) The 1.7+-acre site is bounded on the north (makai) by Kamehameha Highway. The Kaneohe side is bordered by a drainage ditch and older commercial and residential structures. The area behind the subject site is former sugar cane and agricultural land which is no longer used for that purpose. Residences in the back (mauka) of the site are located several hundred feet from the project site. Residences exist on the Kahuku side of the project site. Beyond these immediate areas is open agricultural land.
- (b) The site is basically level and lies approximately 2 to 6 feet above mean sea level. Because the higher portion of the site is at the makai end, with the lower elevation (two feet above mean sea level) at the mauka end, the site lies totally within the tsunami inundation zone.
- (c) There are no streams or gullies within the site. Geologically, the area consists of a coastal plain approximately half a

mile wide. This coastal plain extends upward to an elevation of 20 feet. The subsurface materials in this plain are mostly thin alluvium and deep deposits of calcareous sand. The sand deposits extend down to a depth of about 25 feet. Beyond that depth, basalt and coral may be encountered.

- (d) Presently, the site is vacant and covered by various weeds and trees.
- (e) There is a 15-foot easement makai of the site for the future widening of Kamehameha Highway.

2.6 Public Utilities and Facilities.

- (a) Potable water is available to the project site. There is a water meter (approved and installed by the Board of Water Supply) for this proposed project. Account #664168454. The developer has ordered the reinstallation of a 3-inch compound meter for the project. According to the Board of Water Supply's present policy, because the owner has ordered on the meter, water is committed to the project.

- (b) There is no public sewer system in this area, nor are there plans to provide a public sewer in the long-term future. The surrounding residential and commercial structures have individual cesspools. The project will have its own sewage treatment plant (providing an equivalent of secondary treatment) for sewage generated by the project. A detailed description of the plant is provided in Exhibit 1. The treated effluent will be disposed of via injection wells on the project site. When necessary, a private pumping firm will be retained to handle the sludge and dispose of it at a City and County facility designated for this purpose and/or in a manner by which it is presently being accepted by the City and County for systems in the area. Short- and long-term plans call for the private operation and maintenance of the proposed STP. Grading plans call for the elevating the site of the STP to prevent flooding. Additionally, the sewage treatment plant consultant has indicated to us that temporary inundation of the STP will not cause the STP to malfunction.

The STP will be a low-rise structure, not higher than a single-story home.

- (c) There is no improved drainage system on the project site. A drainage plan for the site has been prepared and reviewed by the Drainage Section of the City's Department of Public Works. (See Appendix C.) This plan was previously approved and consists of discharging surface water (falling on the roofs and parking areas) near an existing culvert (next to Kamehameha Highway) so that the runoff will go into the culvert and be discharged in Punaluu Stream, 800 feet down from the Highway.

- (d) Electricity and telephone are available on overhead lines along Kamehameha Highway. No gas lines are located in the area.
- (e) Solid waste will be collected and disposed of by a private refuse company.
- (f) Public schools which presently serve the project area include Hauula Elementary School and Kahuku High and Elementary School. Kahuku High and Elementary School will serve students from grades 7 to 12. The distances to these schools are 3± and 6.7± miles, respectively. Little or no students are expected to be generated by this project because of vacation and second residency use.
- (g) Recreational facilities will be provided on-site. Off-site, the Punaluu Beach Park is the nearest public park. The Park is within walking distance (500± feet) and provides 2.84 acres of beach and water oriented activities. Because this property is not adjacent to the shoreline, no beach access or right-of-way is required.
- (h) Retail and commercial facilities are available along Kamehameha Highway. These are relatively small and scattered commercial facilities include grocery stores, restaurants, service stations, laundromat, and specialty (tourist-oriented) shops. The closest area where a shopping center and larger stores can be found is Hauula, approximately five miles away (a 10-minute drive).
- (i) Medical facilities are not found in the immediate area. The nearest emergency medical facility, the Kahuku Community Hospital, is located eight miles from the project site. Normal medical facilities (e.g. doctors' offices, clinics) are located in Honolulu (a one hour drive from the project site).
- (j) The nearest fire stations are located in Kaaawa and Hauula. A fire call would normally be answered within ten to fifteen minutes.
- (k) Police from the Kaneohe Police Substation normally patrol the area (going to and from Kaneohe to Kahuku) along Kamehameha Highway. Because of this system, emergency calls from the project site should be answered within thirty minutes.
- (l) The major highway serving the area is Kamehameha Highway. Kamehameha Highway is a 2-lane, 2-way thoroughfare (at this location) and provides an acceptable level of service for present travel demands. It is anticipated that travel demands over the next 15 years will be accommodated by this thoroughfare.
- (m) Mass transit, in form of TheBus, is available along Kamehameha Highway. Bus stops are found within one hundred feet of the project site. Buses going to Honolulu or Kahuku normally run one hour apart.

2.7 Timing of the Proposed Action. It is anticipated that the project will be implemented as soon as all approvals and permits are issued. This may occur by Fall, 1981. Construction of the project will be done in one phase. The construction time will be approximately one year.

3. THE AFFECTED ENVIRONMENT

The condition of the project site was primarily discussed under subsection 2.5 (pages 4 and 5). Additional information provided in this section includes microclimatic conditions, flora and fauna, and fauna, and water quality conditions. The location on the site is shown on Figure 1.

The project site fronts shallow, Class AA coastal waters which precludes any point discharge. The Punaluu shoreline is a popular beach area. Water related recreational activities include swimming, snorkeling, boating, fishing, and camping. A coral reef is located approximately 3,000 feet off-shore and the majority of the area in between is at a water depth of approximately 2 feet, according to the U.S.G.S. quadrangle map (Kahana, Hawaii).

The climate of the project area is fairly uniform throughout the year, as is generally characteristic of the entire island of Oahu. The mean annual temperature in the area is 74°F with monthly average ranges from 69°F in January and February to 79°F in August and September. The area receives an average annual precipitation of approximately 65 inches. Winds are typically (80 percent of the time) from the north, northeast; these are locally called the tradewinds.

Reconnaissance soil studies indicated that the site is blanketed with a layer of loose to medium dense beach sand that ranges from three to six feet deep. This layer is underlain by a layer of moderately weak and compressible silty sand and gravel to depths of 17 to 30 feet. This layer, in turn, is underlain by medium stiff to stiff silts to about 25 feet. The ground water level was encountered about 4.5 feet below the ground surface. (It should be noted, however, that there is no source of potable water on or near the project site.)

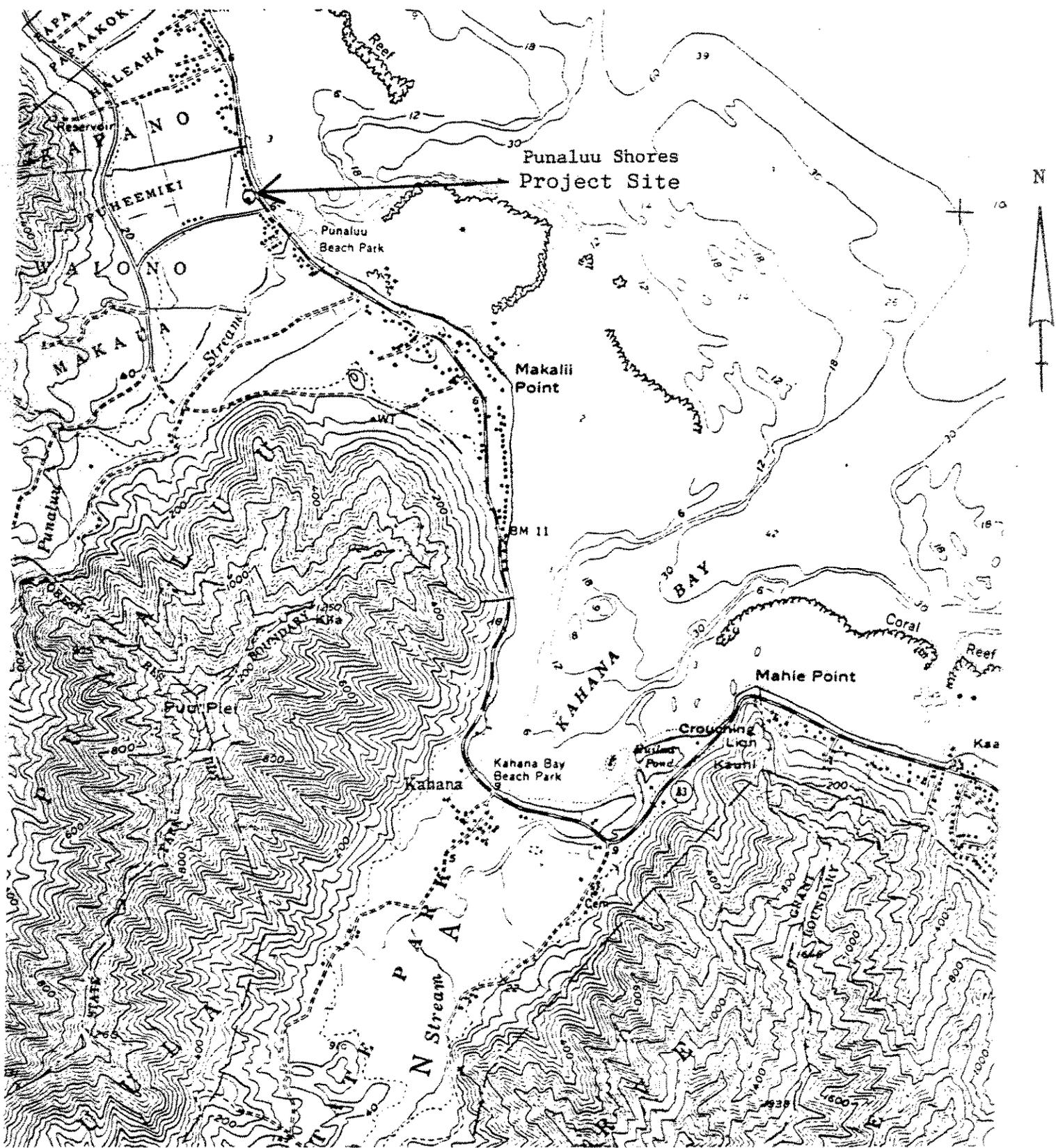
The present vegetation on the project site consists of noxious weeds, grasses, some coconut palms (at the borders), screwpine trees, koa haole, and castor bean plants. The weed and grass growth probably occurred after the 1976 clearing of the project site. (Table 1 provides additional plants observed on the site.) These plants are primarily exotic; there are no known rare or endangered species of plants on the project site.

Mammals on the project site are common and considered pests. These include the Polynesian rat (Rattus exulans), Roof rat (Rattus rattus), House mouse (Mus musculus), and Small Indian mongoose (Herpestes auropuctatus).

The avifauna (birds) on the site, include common, urban adapted species like the Cardinal, Barred Dove, Spotted Dove, Elepaio, I'iwi, Common Mynah, Pueo, Ricebird, House Sparrow, and the Japanese White-eye. These are birds found throughout Oahu. There are no known rare or endangered birds inhabiting the site or the surrounding area.

During the EIS Consultation Period, the U.S. Department of Interior, Fish and Wildlife Service (letter dated January 22, 1981), indicated concern about "nearby wetlands" that provide habitat for endemic and

Figure 1 USGS Map of the Punaluu and Kahana Area



Portion of the USGS Map of Kahana, Hawaii
Scale 1 inch = 2,000 feet

TABLE 1

LIST OF EXISTING VEGETATION ON PUNALUU SHORES SITE*

<u>Common Name</u>	<u>Hawaiian Name</u>	<u>Scientific Name</u>
Screwpine	Hala, Pu-Hala	<u>Pandanus odoratissimus</u>
'Ilima	'Ilima-ku-kahakai	<u>Sida fallax</u>
Coconut Palm	Niu	<u>Cocos nucifera</u>
Milo	---	<u>Thespesia populnea</u>
Golden Crown-Beard	---	<u>Verbesina encelioides</u>
Koa Haole	---	<u>Leucaena leucocephala</u> syn. <u>L. glauca</u>
Sandbur	---	<u>Cenchrus echinatus L.</u>
Beach wiregrass	---	<u>Dactyloctenium</u> <u>aegyptium (L.)</u>
Lovegrass	Hakonokono	<u>Eragrostis tenella (L.)</u> syn. <u>E. amabilis (L.)</u>
Cats Claw	---	<u>Caesalpinia sepiaria</u>
Hairy Abutilon	---	<u>Abutilon molle</u>
Castor Bean	---	<u>Ricinus communis</u>
Sensitive Plant	Hilahila	<u>Mimosa pudica</u>
Floras Paintbrush	Red Pualele	<u>Emilio sonchifolia (L.)</u>
Sugarcane	Kō	<u>Saccharum officinarum</u>

* This only identifies the more predominant plants on the project site.

endangered waterbirds. Study of the wetlands in the surrounding area indicates that the closest wetland is located in Kahana Valley about 2.0 miles from the project site, over a ridge on the Kaneohe side of the project site. With this distance, and in consideration of the terrain between the site and the wetland, it is not anticipated that the project site would affect either the wetland or flyway patterns of the endangered avifauna.

4. THE RELATIONSHIP OF THE PROPOSED ACTION TO LAND USE PLANS, POLICIES, AND CONTROLS FOR THE AFFECTED AREA

The project site is designated Urban by the State Land Use Commission. The present Detailed Land Use Map for the area identifies the future use of the site as hotel/residential; the site is zoned R-6 (residential use a small portion) and H-1 (hotel). The proposed hotel/condominium is consistent with the State designation, present Detailed Land Use Map, and the zoning.

However, since the approval of the initial permits (1975), several laws have been enacted, and several proposed land use plans for the area are under consideration for approval. The requirement for the Shoreline Management Area (SMA) permit is now necessary. The new General Plan for the City and County of Honolulu ("Objectives and Policies," January 18, 1977) was passed by the City Council (Resolution No. 238). This area (Kahaluu to Kahuku) is identified as "rural" in the General Plan. The General Plan indicates that significant growth in this area is not desired. Because the overall objectives and policies of the General Plan are broad, the Council mandated the preparation of Development Plans for each major area. These Development Plans would provide, on a more detailed basis, the land use guidelines needed to implement the intent of the General Plan. At this time, the Development Plans are under review by the Council; drafts of the Development Plans are available, but are subject to final changes and approval by the City Council.

The draft Development Plan for this area is in conflict with the proposed use of this project site. That is, the present Detailed Land Use Map and zoning of the project site is in conflict with the draft Development Plan. The intent of the proposed Development Plan is to maintain the rural environment and its attractiveness. Also: "The intent is to minimize changes in existing communities in order to maintain the desired physical and social character and lifestyle." Relating the proposed project to these statements, it was found that the proposed action is inconsistent with the General Plan and the proposed Development Plan.

It was found that, at this time, the County's land use policies are in a state of change; while the project site has previously been approved and is in the process of getting new approvals under its present zoning, the proposed land use plans apparently contradict the use that is allowable under the existing zoning.

If the project is not allowed to proceed because of the contradiction, the loss of the "highest and best use" under the present zoning would be significant to the owner/developer. Several national and local cases of such a loss (e.g. downzoning) have resulted in a fair monetary compensation to the owner/developer. The immediate local case that would be similar is the property in Mokuleia where the Council provided about \$350,00 for the downzoning (to R-6) of the property. In the case of the Mokuleia parcel, the owners showed that they had "vested rights" in the apartment zoned property. It should be noted that for this project the developer has expended \$1 million for plans and studies to implement the hotel project since his purchase of the property. Other national cases of downzoning and compensation are referenced in Exhibit 7.

During the Draft EIS review, the Department of Land Utilization provided this comment on this issue of zoning versus Development Plan policies:

"The proposed Development Plan for the Koolauloa District designates the project site for residential use. We are reviewing the Detailed Land Use Map (DLUM) designation with the Department of General Planning and may ask them to consider an amendment of the DLUM to what may be a more appropriate designation. Should the DLUM be amended, we intend to move toward a rezoning to the new designation."

During the Draft EIS review period, one of the comments suggested that the Final EIS review the draft State Tourism Plan (Department of Planning and Economic Development, April 1, 1981). The draft Plan was reviewed. It was found that the Plan does not specifically address itself to this type of small "retreat-type" resort use. While it does address the impact of destination resorts and resort areas, it was found that many of the impacts of destination resorts would be substantially more significant than the proposed hotel at Punaluu. Also, the Plan did address the need for resident support in the establishment of a resort area/hotel; it was felt that resident support would provide a more amicable situation between visitors and residents. In this specific proposal, the community does not support the proposed project.

5. THE PROBABLE IMPACT OF THE PROPOSED ACTION ON THE ENVIRONMENT

It should be noted that, in general, people and their activities generate various magnitudes of environmental impact. Each individual produces and generates various forms of wastes and chemicals ranging from discarded food packaging to indirectly accounting for vehicular emissions and applications of fertilizers to supplement desired plant growth. Land modifications, building of structures, and infrastructures included in this and other similar projects also cause impact on the environment. Also, one must not forget that people's views, interactions, and economic inter-relationships affect the socioeconomic profile of a relatively small community such as Punaluu.

This review of the impacts of the proposed Punaluu Shores Project acknowledges that many forms and different magnitudes of environmental impacts will occur, simply as a result of the significant increase over the present residential density of the site. Through evaluation of various environmental components, and based on past experiences, the probable impacts were determined and are discussed in various sub-sections below.

Impacts of the proposed project were viewed in two categories. The first would be the site and construction work impacts. These are considered to be short-term, temporary effects. Although temporary, the activities include land modification which is likely to generate noise, fugitive dust and potential soil erosion (resulting in water pollution) under heavy rainfall conditions. The second category of impact can be termed "residential occupancy". This would be continual and would have long-term effects. It involves people's actions and their individual and collective resource requirements that results in modifications to their physical and socioeconomic environment.

5.1 Physical Impacts.

- (a) Grading will level the site sufficiently to build the proposed structures and pave the parking area. The site of the sewage treatment plant will be elevated so that flooding would be prevented. The building's dwelling units will be situated on or above the second floor, thus, flooding of the dwelling units will be avoided. Grading will conform with the Grading Ordinance, and the contractor must comply with all standards and regulations relating to site and construction work. Fugitive dust will be minimized through the wetting down of the work area. No unique topographical features are located on the site.
- (b) The microclimate will be slightly modified by the project. Heat from the asphalt surfaces may warm the project site. However, extensive landscaping and the eventual growth of shade trees will provide a ground-cooling effect. Ground winds will be modified with the construction of the building. This is normal in any case where a building is constructed.

During the Draft EIS review period, the comment that sunlight to the existing residences on the Kahuku side of the site would be blocked was made. The blockage of sunlight if it occurs at all should occur only during mid-morning hours for a short (less than one hour) period of time. Relating to the hotel obstructing wind patterns, it is noted that the area is affected by land and sea wind patterns, that is, during the day the cool breeze from the ocean blows inland, cooling the hotter land area. Subsequently, the residences on the Kahuku side of the project would not be affected because the proposed hotel would not block the predominant breeze from the sea.

- (c) Negligible impact on the flora and fauna of the site is anticipated. The vegetation within the site consists of common trees and noxious weeds. Likewise the fauna is exotic or common. It is likely that the clearing and construction activities will disturb the avifauna and may even cause them to leave the project site. However, in many cases throughout Oahu, these exotic and common species of birds often reestablish themselves after completion. The vegetation destroyed will be partially compensated with landscaping.

5.2 Economic Impacts. Economic impacts will include the increased real property tax paid on the project site. Also, the sales tax from purchase of the two-bedroom units, rental of the lodging units, and related real estate transactions. Future residents will slightly increase the volume of sales in the area (e.g. sales of groceries, fast foods, supplies). During construction, the project will provide jobs for the construction industry and to building, appliance, and furnishing suppliers.

Governmental expenditures in the form of additional man hours that may be needed for serving the project will be used. This includes monies for fire inspections, police personnel, road maintenance, sewage inspectors. These governmental expenditures would normally be expended for all types of projects. It is felt that these expenditures will be offset by the the increased tax revenues from the project. No governmental funds will be directly used for the development of this project.

Families purchasing the two-bedroom units will have financial security and jobs; no significant impact on employment patterns are foreseen. A few (5 to 10) jobs will be created by the hotel operation. It is likely that these jobs will be filled by people living in the Kaneohe to Kahuku area.

Indirectly, because of the higher value and use of the property, the surrounding residential and commercial properties may be affected, increasing their value. The increase in property taxes is predicated on the proportion of taxes itself (to the value of the property), and the increase in the property value. The increase in the property's value depends on the zoning, use, structures, capital improvements, inflation rate, value of similar property in the existing area, adjacent property uses, etc. In other words, the increase in property value is based on a variety of factors one of which includes adjacent property value. Subsequently, it is highly probable that the value of the adjacent properties and the taxes on these properties will increase with or without the implementation of the project.

5.3 Social Characteristics. Appendix A provides a more detailed discussion on the socioeconomic profile of the affected area. It is felt that the new residents will interact with the surrounding community; however, the extent of the interaction will be highly dependent on the individual residents of the proposed project. Interactions between the residents of the proposed project will also occur. It is felt that the new residents will have different lifestyles; however, because many of these people are seeking out a rural-type atmosphere, it is unlikely that they will encourage change or additional growth.

Social conflicts are difficult to predict, especially when a small (306 estimated) population is infused into the community. However, it would appear that the community is accustomed to a vacationing visitor (local and non-local), and that there are few instances of visitor/local conflict in this area. It should also be noted that Pat's of Punaluu, located 0.7 mile from the project site (in the Kahuku direction), has a similar hotel/condominium use, and that no social conflicts between visitors and locals appear to be occurring. At this time, the Punaluu Community Association and the Koolauloa Neighborhood Board #28 have taken a position against the project because it is inconsistent with the intent of the proposed Development Plan (see the discussion on the intent of the proposed Development Plan).

During the Draft EIS review period, the Punaluu Community Association provided the following opposing viewpoint on social impact. Their letter stated:

"Projects which promote resort use cannot by their own nature blend into a rural-type atmosphere. Vacationers do not have a commitment to a community or to community needs. There is no time to develop 'interaction', only time enough to 'get the most out of their vacation dollars'. There appears to be no contribution that these visitors can make directly to the community, only to those to whom they pay their rental fees."

This viewpoint is included in the Final EIS since it represents an opposing opinion on the impact of the project on the community.

5.4 Land Use Impacts. (Also see the discussion on the consistency of the proposed project with the proposed Development Plan and the General Plan.) The project will not be consistent with the surrounding uses. The surrounding uses are in open space, agriculture, commercial, and residential. The condominium use of this property is considerable higher than these uses. This is desirable from the developer's standpoint because of the isolated and rural nature of this location. The future residents and visitors living within the site desire this type of setting.

As mentioned above, Pat's at Punaluu, is of a similar land use.

The project is consistent with the State and County's land use designation and zoning. The project is not consistent with the General Plan or the proposed Development Plan.

Appendix D provides a review of the project in respect to Chapter 205A, HRS, relating to uses within the coastal zone.

5.5 Impact on Environmental Quality.

- (a) Minimal impact on water quality is expected. The sewage generated by the project site will be treated and discharged into injection wells. The effluent must comply with the criteria established in the Department of Health's Public Health Regulations, Chapter 38. An operation and maintenance manual for the plant must also be approved and filed with the Department of Health, in accordance with the Chapter 38. (See Exhibit 2.)

Regarding impact on groundwater, the Board of Water Supply (letter of March 19, 1981) during the Draft EIS review period, stated:

"The proposed sewage treatment and disposal system is not anticipated to affect existing potable groundwater resources if the effluent is discharged by gravity flow into an injection well that is less than 30-feet deep. The plans for any injection well deeper than 30-feet or proposal to pump the effluent into the injection well must be submitted to us for review and approval. Data on water quality and boring logs should be included with the submittal."

In addition, the sewage treatment plant consultant noted that:

"I would like to emphasize that the treated effluent from this proposed development will be of far higher quality than the untreated sewage flowing into the ground from a typical cesspool serving the single family residence. Therefore, concern should be focused on the existing cesspools in the area that pose a greater threat to the health and environment of the community."

Additional information on the coastal water quality to establish baseline information would prove to be extremely costly and time-consuming. Given the size of the project and the higher level of sewage treatment provided (in comparison to the adjacent cesspools) such a study would appear to be impractical and unnecessary. Also, in 1976, Gordon Dugan, Ph.D., prepared a study of water quality impact on a proposed residential project in the Punaluu area. In regards to the affect of effluent on the receiving water, Dugan stated:

"The affect that the effluent from private sewage disposal systems will have on the receiving water, after passing through the soil zone, is nearly impossible to ascertain with a high degree of confidence, inasmuch as the following factors are not accurately known: the length and direction of the subsurface flow path; the type of substratum the effluent is flowing through and what effect it has on the constituent contained in the effluent; the dilution factor, both in the subsurface and the fronting ocean; and the dispersion patterns of coastal waters."

The Drainage Study prepared by R. M. Towill Corp. is included in Appendix C. Briefly, the Study states:

"The lot will be filled to elevation 9.5 feet for both the sewage treatment plant and the apartment area. The hotel building will have a first floor elevation of 10.0 feet. The site grading was designed to drain as much of the onsite storm runoff to the existing ditch along the southern boundary to reduce flooding that exists in the low-lying area to the west of the property. The existing ditch (south boundary) will be cleared and should aid in relieving the existing flooding in the low-lying area."

"The onsite drainage improvements being proposed are a grass swale to drain the western area of the site and concrete channel section to drain the northeast part of the site."

"The proposed grading and drainage plan shown in Figure 3 is necessary to keep the apartment-hotel complex and sludge treatment plant from being inundated during large storms. By directing the storm water falling on the project property to the highway culvert and cleaning the existing ditch leading to the culvert, a beneficial, rather than detrimental, effect is anticipated for the surrounding low-lying area."

The study has been reviewed and accepted by the Department of Public Works. Further information on the drainage, flooding, and sewage treatment plant are provided in Exhibits 5 and 6.

The storm runoff not absorbed into the ground will be discharged into Punaluu Stream, 800 feet from the shoreline. Based on the drainage plan, the total storm runoff will not be significantly greater than the existing storm runoff. The chemical content of the stormwater discharge will be similar to the urban stormwater runoff characteristic of the surrounding commercial/residential areas.

- (b) Flood damage to the structural improvements on the project site will be minimized by elevating the site of the sewage treatment plant, and placing the living units on or above the second story of the building above the flood hazard level. The proposed project site is located within a tsunami inundation area where the tsunami elevation ranges from 8 to 10 feet above Mean Sea Level (Zone A4). Although a portion of the site is located within the Coastal High Hazard Area, a portion of the site is not situated within any designated flood plain, but rather is situated in an area of minimal flooding (Zone C).

During the Draft EIS review, the Department of Public Works noted that: "The proposed project is located in a Federal Insurance Administration Flood Hazard Area and must comply with the applicable ordinances." At this time there does not appear to be flood insurance requirements; however, should a requirement become known, the developer will comply with all applicable ordinances and insurances.

- (c) Impact on air quality is expected to be minimal. During construction, fugitive dust will be mitigated by wetting down the work area. Indirect air quality impact in form of vehicular air emissions is insignificant in comparison to the over 15,000 ADT (average daily traffic) which passes along Kamehameha Highway. Based on an average of six trips per day per parking space- 6 trips x 106 parking spaces = 636; this number would represent 4 percent of the ADT. In addition, it is likely that these trips would be taken during off-peak traffic hours (because of the visitor/vacation nature of this project); thus, the project would not likely increase any peak-hour congestion. The Department of Transportation has given preliminary concept approval to the proposed ingress/egress (see Exhibit 3).

Although no representative air quality data exists for the area, it is expected that the air quality meets the present State ambient air quality standards (Chapter 42) because of the rural/agricultural nature of the area.

During the Draft EIS review, comments on a potential odor problem from the STP and sludge beds were made. In regards to a possible odor problem from the STP or sludge bed, this matter was taken up by the Planning Commission, December 19, 1973. A portion of the transcript of the meeting is quoted below, the speaker responding to the odor question was Dr. Nathan Burbank, of R. M. Towill, Corporation.

"The STP for this particular installation is a design on the extended aeration plant; that is, the sewage is held in the tank for 24 hours in the presence of oxygen and activated sludge bacteria. The liquid portion is settled. The solids that remain are returned for re-aeration in the activated sludge plant.

As sewage is fed to such a plant, there always comes about an accumulation of biological organisms. This is part of the process. As they grow, they die and they must be removed from the process. They are removed in the aerobic digester. You notice in every case I mention this is aerobic, all in the presence of air and oxygen. The whole intention of this process is that it be as odor free as possible. In a true aerobic process, the odor certainly is not objectionable and often not noticeable.

The bacteria freed for this process is held in this aeration tank for aerated digestion for a period of about five days. It is during this period that much of the organic matter, and I won't say every bit of it, is converted to forms that are considered to be odorless..."

- (d) Noise during the site preparation and construction of structures is expected. This noise is subject to the State Department of Health's Public Health Regulations, Chapter 44B, relating to Community Noise. Some construction noise, however, is inevitable and it is possible

that it may cause some distraction or annoy adjacent residents. If noise complaints occur, the contractor can take the following steps: (1) instruct workers to avoid any unnecessarily gunning of equipment, (2) install mufflers on all mechanical-moving construction equipment, and (3) construct a berm to act as a noise barrier.

The existence of this new project will create some noise from home and recreational activities. This is normal and should not generate significant or annoying noises. If noise becomes excessive, the management and/or police will usually intervene under the State's and County's noise standards and codes.

- (e) Few view planes will be obstructed because of the 7-story hotel. The residents situated several hundred feet in the back (mauka) of the site along the low coastal plain can, for the most part, view only the surrounding vegetation. There are no residences directly behind the project site. The 7-story building will be visible from the adjacent areas (side and mauka) and from the ocean (toward land); other than that, the landscaping will shield the building and parking areas from the eye-level sight of pedestrians and motorists along Kamehameha Highway.

Based on comments received during the Draft EIS review period it was clear that several agencies and community organizations found that the 7-story hotel would be incompatible with the present rural environment and existing single-family structures. The view plane from single-family homes mauka of the site would include the 7-story hotel. Additionally, the view along the coastline would be affected by this proposed hotel. Also, the privacy of the single-family residences would be "invaded". While these may be valid concerns, it was noted that the zoning of the property (1966) allows hotel use. The property was zoned prior to the construction of many of the adjacent homes. Subsequently, the potential of having a high-rise hotel on the site was known to some residents. While the building and use is not consistent with the heights of the surrounding structures, it is highly subjective to consider the proposed height a "substantial degradation". For example, Pat's at Punaluu, a 7-story structure, does not appear to be overly obtrusive in its present setting. Finally, while the visitors and residents of the proposed building will have a view of adjacent homes in the surrounding area, this is not unlike other urban and rural areas on Oahu where, because of elevated structures or natural elevation (e.g. hill or mountain top) surrounding homes can be viewed by neighbors.

As for the exterior design of the building and the building's shape and size, the architect has indicated that the building's design is one which he found to be economical and efficient and that the exterior will be aesthetically pleasing and not just a "wall".

- (f) The proposed hotel building is set back over 65 feet from the present Kamehameha Highway; subsequently, the driver's visibility along the Highway should not be affected.

- (g) The lights in the parking area and around the building will be placed so that only the immediate area below it is lighted. Further illumination would not only be costly but a waste of energy.

5.6 Impact on Historical/Archaeological Sites. There are no historical and/or archaeological sites on the subject site. (Reference: Sites of Oahu, compiled by Elspeth P. Sterling and Catherine C. Summers, Department of Anthropology, Department of Education, Bernice P. Bishop Museum, 1978.) Historically the site was planted in sugarcane; later, it was occupied by a single-family home. More recently, prior to 1976, the site was used for commercial luaus.

5.7 Impact on Infrastructure and Support Services.

- (a) Potable water is available to the project site. It is estimated that less than 30,000 gpd of potable water will be utilized.
- (b) An onsite package sewage treatment plant will be constructed. Approval from the Department of Public Works (Exhibit 4) and Department of Health (Exhibit 2) have been received. The sewage treatment plant consultant will submit the appropriate materials to the Department of Health to fulfill the applicable requirements.
- (c) Connections to existing overhead telephone and electrical lines on Kamehameha Highway will be made. Electrical energy for the proposed project is estimated to be 70,000 kwh per month.

During the Draft EIS review period, the Hawaiian Electric Company, Inc. (March 23, 1981) provided the following information on the project's impact on their electrical facilities: "At the present time, we can see no impact on HECO's transmission/distribution and substation facilities that will be caused by the project."

During the Draft EIS review period, the Hawaiian Telephone Company provided the following comments relating to telephone facilities:

"We have reviewed the subject Draft EIS and have no objections to its contents nor to the proposed project. However, we would like to call your attention to Section 2, paragraph 2.6 (d) on page 4 of the EIS regarding telephone facilities. Although telephone overhead lines exist along Kamehameha Highway, they are of insufficient capacity to service the proposed project. Consequently, a new overhead cable will be constructed on existing poles along Kamehameha Highway from our Laie Switching Center to the project site, a distance of approximately five miles. This new cable will be of sufficient capacity to meet all telephone requirements of the project as well as projected future requirements along the cable route for the next seven years."

- (d) Solid waste collection and disposal will be provided by a private refuse company.
- (e) Little or no school children will be generated by this project. Public schools are available to those children who may be attending public schools.

The Department of Education, during the Draft EIS review period, commented (March 24, 1981): "Our review of the draft EIS for the subject project indicates that it will have a negligible impact on enrollment at Hauula Elementary School and Kahuku High-Intermediate School."

- (f) Commercial and retail stores are within a fifteen minute drive from the project site.
- (g) Emergency fire, police, and medical services are available, but due to the rural nature of the area, these emergencies will not be answered as quickly as an urban area.

During the Draft EIS review period, the Fire Department (March 23, 1981) provided the following comments on the proposed project:

"We have no objections to the Punaluu Shores project. The Hauula Fire Station is approximately two miles and four minutes away from the proposed project. Supportive service will be provided by the Kaawa Station which is five miles and eight minutes away. Our chief concern is that the developer observes all fire prevention regulations while the project is being constructed."

The building plans incorporate fire protection devices as required by present fire codes. No specialized high-rise fire equipment is available at these fire stations.

- (h) On-site recreational areas are available. The shoreline and Punaluu Beach Park is within a short walking distance. Other recreational sites, private and public, are found in Laie, Hauula, and Kahuku, all within ten miles of the project site.

At this time, the developer plans to satisfy the Park Dedication Ordinance by using the recreational areas within the site toward the requirements and by monetary contribution. Details will be coordinated with the Department of Parks and Recreation.

The site is not adjacent to the shoreline area; no public easement or right-of-way to the beach is necessary.

- (i) The transportation system is adequate and can accommodate the traffic generated by the project site. Presently, the highest peak-hour volumes along Kamehameha Highway in this area occurs on Sunday afternoon. Recently (March, 1981) highest one-hour counts recorded was about 800 cars (both directions). Based on traffic analysis, there is justification to expect that Kamehameha Highway

under present conditions of a two-way, two-lane highway has a capacity of 900 vehicles per hour in one direction and 1,350 for both directions of travel at level of Service C. This leaves a surplus capacity of about 450 vehicles during the peak-hour condition. The addition of this project would be well within the capacity of the present highway.

Mass transit is available; however, it is likely that residents and visitors will have their own automobile because it provides individual mobility and convenience.

- (j) During the Draft EIS review, the Police Department (letter of March 13, 1981) discussed the need for a crosswalk in the vicinity of the hotel so that guests could reach the beaches and the Kahuku-bound buses. In response to this comment, it was noted that in rural areas such as these, the pedestrians use their discretion in crossing the highway. However, the location of a crosswalk will be discussed the the Department of Transportation.

6. ANY PROBABLE ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

The following adverse environmental effects (both short- and long-term) cannot be avoided.

- (1) The site-clearing and construction work will result in temporary fugitive dust, some disruption to traffic, noise, and elimination of vegetation and displacement of fauna and avifauna.
- (2) Traffic will slightly increase. Kamehameha Highway presently has an average daily traffic of 15,000 vehicles, the proposed project will generate (at maximum) 636 vehicular trips per day. This amount represents about 4% of the total ADT. It should also be noted that the very little vehicular trips are expected during the peak hour period because of the visitor/vacation characteristic of the occupants.
- (3) The need for public services for fire and police protection, schools, and public recreational facilities will increase slightly.
- (4) The view plane will be obscured from several residential areas adjacent to the project and from the ocean to land view.
- (5) The project will not be consistent with the County's General Plan and the proposed Development Plan.
- (6) The project is opposed by the community organization and the area's neighborhood board.

7. ALTERNATIVES TO THE PROPOSED ACTION

At this time the applicant has not considered other alternatives. The proposed project, as described earlier, was approved and designed prior to 1976. It is possible that other designs and uses may be considered if approval is denied for this project. Until such action (disapproval) is taken, the developer has not indicated whether other alternative designs or uses will be considered. The developer present plans are to pursue this project. At this time, the developer notes that over \$1 million has been spent on plans and studies on developing the proposed plan. He has informed the Department of Land Utilization that the expenditure of these monies establishes his "vested rights" in the zoning of the subject site.

A no-action alternative will result in the land remaining undeveloped in its present state. Considering the value of the land under the current zoning, it is expected that the land will not remain unused for a long period of time, and that other alternative plan to develop the site will be eventually resubmitted. A no-action alternative would support the existing County General Plan as would a residential use of the site.

8. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY AND ANY IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The proposed action will result in a significant change from the site's present land use (from open space to a seven-story building).

The proposed action will use or commit the following resources:

- (1) Land. The 1.768-acre site will be a long-term commitment to urban use. Once this use and density has been achieved, it is likely that this investment will be viable over a 30+ years. It is rare that once a site has been developed, the use of the site is downgraded. The use of this site forecloses the other future use options of the land.

The Punaluu Community Association provided this additional comment on this matter:

"A seven-story building for resort use will have a long-term commitment to urban use and a long term affect on the use of the surrounding lands. Agriculture uses are usually lost to pressures created by urban uses. These uses (resort vs. agriculture) are incompatible."

- (2) Labor and Construction Materials. Labor will be the primary human resource used. Labor in the form of planning, designing, engineering, and constructon will be utilized during a short-term period. In the long-term period, labor related to building maintenance and security, management, real estate sales, and services will be used. Although labor will be used, this resource is renewable and will be compensated.

Construction materials such as wood, concrete, asphalt, steel, will be used. Landscaping materials (i.e. plants) and household appliances will also be utilized. Once construction and other materials are used it is likely that these materials will be used again.

- (3) Consumption of energy, water, and use of public facilitie and services. The project will place additional demands on energy, potable water, sewer system, police services, and public recreational areas.
- (4) Open space value of the project site. The open space value of the project site a resource. The proposed project will result in the loss of this open space along with impact on the ocean to shore view of the coastal area.

9. MITIGATION MEASURES PROPOSED TO MINIMIZE ADVERSE IMPACTS

The following mitigation measures will reduce adverse short-term and long-term environmental impacts.

- (1) Mitigation of unwanted noise.
 - (a) The contractor must have adequate mufflers on his construction equipment and through proper management avoid the "gunning" of machinery.
 - (b) Noise from vehicles will be mitigated as automobile manufacturers comply with Federal mandates for a "quieter" running automobile.
- (2) Mitigation of fugitive dust. Compliance with the grading permit and the wetting down of work areas will effectively reduce fugitive dust.
- (3) Air pollution from vehicles. Carbon monoxide from motor vehicles will be decreasing over the next several years due to Federal laws which will require automobile manufacturers to reduce air emissions from new automobiles. As the vehicular fleet replaces the cars on the road, the newer automobiles will contribute less to the air pollution.
- (4) Lessen impact on public recreational facilities. By incorporating a recreational area into development plans, it is anticipated that the residents will be more inclined to use on site recreational facilities.

Other mitigation measures are inherently provided by adhering to all City and State laws, regulations, and standards applicable to the project.

No mitigation measures are proposed to decrease local opposition or to select an alternative action that complies with the General Plan. These are conditions which are disadvantages to the project.

10. AN INDICATION OF WHAT OTHER INTERESTS AND CONSIDERATIONS OF GOVERNMENTAL POLICIES ARE THOUGHT TO OFFSET THE ADVERSE ENVIRONMENTAL EFFECTS OF THE PROPOSED ACTION

The height, setbacks, and use of the proposed building have been determined largely by the zoning restrictions. The determination of parking spaces and loading zones was based on the Comprehensive Zoning Code (CZC). The sewage treatment plant, sludge disposal, and effluent quality must comply with the Public Health Regulations, Chapter 38. Other regulatory requirements (e.g. fire protection devices, building structure, drainage facilities, access to the highway) must also be incorporated in the development plan. To this extent, it is felt that the compliance and mitigation measures within governmental policies are inherent in the initial project design.

The Special Management Permit (SMP) application, when filed, will identify and compare the project with the objectives and policies of the coastal management area. In this regard, this governmental review acts to determine if the proposed project is within the guidelines established to protect the shoreline areas.

11. ORGANIZATIONS AND PERSONS CONSULTED DURING THE EIS PREPARATION PERIOD

11.1 The EIS Preparation Notice. The EIS Preparation Notice was prepared by the Department of Land Utilization, City and County of Honolulu, based on the information obtained from the Environmental Assessment submitted by the applicant. The EIS Preparation Notice is dated October 6, 1980. In accordance with the "Environmental Impact Statement Regulations," the Notice was provided to the State Environmental Quality Commission (EQC). The Commission for informational purposes only and at the request of the Department of Land Utilization, published the preparation notice under the Register of Shoreline Protection Act Documents in the EQC Bulletin of October 23, 1980. The Regulations call for the Notice to appear in the EQC Bulletin; interested parties may then request a copy of the EIS Preparation Notice. If a request is received to review the Notice, the reviewer is given 30 days (from the date of the request) to provide comments. In addition to reviewers requesting a copy of the Notice, the applicant or his representative is expected to circulate to various governmental and civic agencies, and other interested parties a copy of the Notice. In conforming with the latter process, the environmental consultants, Environmental Communications, Inc. (ECI) distributed copies of the EIS Preparation Notice to various agencies identified in Table 2. The Notice was mailed out on December 23, 1980 and requested comments before January 21, 1981.

11.2 Comments Received on the EIS Preparation Notice. A total of fifteen (15) letters were received in response to the EIS Preparation Notice. Of these written responses, three (3) agencies had no comments to provide at this time. In most cases the comments identified specific concerns that should be addressed in the EIS. These concerns included: the traffic congestion problem, water quality impact, detailed discussion on the sewage treatment plant, and socioeconomic impact. Table 2 identifies the agencies to whom copies of the EIS Preparation Notice were sent, the date of the comment, and the date of the response to the comment (if necessary). It should be noted that the Punaluu Community Association was not sent an EIS Preparation Notice until January 2, 1981, when a reviewing organization requested that the Association be included in the EIS Consultation Period.

Reduced, half-size copies of the letters received and ECI's responses to comments are provided in the following Section.

TABLE 2

PUNALUU SHORES PROJECT
AGENCIES INVOLVED IN THE CONSULTATION PERIOD

<u>Agency</u>	<u>Date Notice Mailed</u>	<u>Date of Comment</u>	<u>Date of Response</u>
<u>City and County of Honolulu</u>			
Honolulu Fire Department	12/12/80	1/09/81	*
Department of General Planning	12/23/80	1/21/81	2/02/81
Department of Parks and Recreation	12/23/80	--	
Board of Water Supply	12/23/80	2/26/81	1/30/81
Honolulu Police Department	12/23/80	1/08/81	2/02/81
Department of Public Works	12/23/80	1/20/81	1/30/81
Department of Transportation Services	12/23/80	1/23/81	1/28/81
<u>State</u>			
Department of Agriculture	12/23/80	1/16/81	*
Department of Transportation	12/23/80	1/13/81	*
Department of Planning and Economic Development	12/23/80	1/22/81	1/28/81
Department of Land and Natural Resources	12/23/80	--	
Department of Health	12/23/80	1/17/81	2/02/81
Office of Environmental Quality Control	12/23/80	1/19/81	1/30/81
Environmental Center, University of Hawaii	12/23/80	--	
Water Resources Research Center, University of Hawaii	12/23/80	--	
<u>Federal</u>			
Department of the Army, Corps of Engineers	12/23/80	1/16/81	1/28/81
U.S. Department of the Interior, Fish and Wildlife	12/23/80	1/26/81	2/02/81
<u>Other</u>			
Kunani O Hauula	12/23/80	--	
Life of the Land	12/23/80	1/23/81	1/28/81
American Lung Association of Hawaii	12/23/80	--	
Koolauloa Neighborhood Board No. 28	12/23/80	--	
Outdoor Circle	12/23/80	1/23/81	1/28/81
Punaluu Community Association	1/02/81	1/23/81	1/28/81

An asterisk (*) indicates that the agency had no comments to offer.

12. REPRODUCTION OF COMMENTS AND RESPONSES MADE DURING THE CONSULTATION PROCESS

Pages 33 to 49 contain reduced size copies of the comments and responses to the comments during the EIS Consultation Period. Where a substantial comment was received, the written response immediately follows the letter. The comments/responses are provided in the following order:

<u>Agency/Organization</u>	<u>Date Comment Received</u>	<u>Date of Response</u>	<u>Copy of Comment on Page</u>
<u>City and County of Honolulu</u>			
Police Department	1/08/81	2/02/81	33
Fire Department	1/09/81	—	34
Board of Water Supply	2/26/81	1/30/81	35
Department of Public Works	1/20/81	1/30/81	38
Department of General Planning	1/21/81	2/02/81	42
Department of Transportation Services	1/23/81	1/28/81	45
<u>State</u>			
Department of Transportation	1/13/81	—	34
Department of Agriculture	1/16/81	—	37
Office of Environmental Quality Control	1/19/81	1/30/81	39
Department of Planning and Economic Development	1/22/81	1/28/81	41
Department of Health	1/17/81	2/02/81	47
<u>Federal</u>			
Corps of Engineers, Department of the Army	1/16/81	1/28/81	36
Fish and Wildlife Service, U.S. Department of the Interior	1/26/81	2/02/81	46
<u>Private Organizations</u>			
Punaluu Community Association	1/23/81	1/30/81	49
Life of the Land	1/23/81	1/28/81	48
Kunani O Hauula	10/15/80*	—	49

* Request received to be placed on the list of consulting parties.

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

1455 SOUTH BERETANIA STREET
HONOLULU HAWAII 96814 AREA CODE (808) 968-5111

N. R. ANDERSON
MAYOR



REFERENCE MS-MJP

January 6, 1981

Mr. F. J. Rodrigues
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodrigues:

Subject: Consultation Process Prior to Filing the EIS
for the Proposed Punaluu Shores Project

We have two primary concerns regarding the proposed project. First, the addition of 102 units would mean an increase of approximately 306 residents, which should slightly increase the demands for police services in District IV. However, this increase could be minimized by attention to the principles of environmental security in the design of the planned project.

Second, the project might add about 200 vehicles to the area. Since only 106 parking spaces are planned, there could be a parking problem. Also, the additional traffic will put considerable strain on Kamehameha Highway, which is already quite congested with traffic during rush hours.

We hope that this information will be of assistance to you.

Sincerely,

FRANCIS KEALA
Chief of Police

BY *[Signature]*
EARL THOMPSON
Assistant Chief
Administrative Bureau

cc: Department of Land Utilization

**ENVIRONMENTAL
COMMUNICATIONS
INC.**

February 2, 1981

Mr. Francis Keala, Chief of Police
Police Department, City and County
of Honolulu
1455 South Beretania Street
Honolulu, Hawaii 96814

Attention: Mr. Earl Thompson,
Administrative Bureau

Dear Chief Keala:

Subject: EIS Preparation Notice for the Proposed
Punaluu Shores Project

Thank you for your letter of January 6, 1981, commenting on the above-mentioned project. We have reviewed your concerns and provide the following dispositions:

- 1) Security. The building will be secured and management personnel will be on duty at principal locations (lobby area). This should discourage thief or malicious behavior.
- 2) Traffic. It is anticipated that the parking spaces will be sufficient for residents and their guests. The project will add (at the most) 75 cars to the peak hour traffic periods. This is not expected to create a significant or adverse impact on traffic.

We appreciate your comments.

Very truly yours,

[Signature]
F. J. Rodrigues

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

FJR:KTP:lpl

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

1855 S. BERETANIA STREET ROOM 305
HONOLULU, HAWAII 96814

CD ANDERSON
HONOLULU



M. N. Nonaka
HONOLULU

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION

STP 8.6953

January 9, 1981

January 6, 1981

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96808

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Dear Mr. Rodriguez:

Subject: Consultation Process Prior to Filing the EIS
for the Proposed Punaluu Shores Project

EIS Preparation Notice
Proposed Punaluu Shores

We reviewed the EIS Preparation Notice for the above project
and have no comments to make at this time.

Thank you for notifying us that an EIS is being prepared
for the proposed Punaluu Shores.

Should your staff need further information or assistance,
please have them call Assistant Chief Lawrence Suganuma
at 955-8304.

Because the access to the development is from our
highway, we recommend that the EIS discuss the traffic
impact anticipated by the development and the setback
provisions.

Sincerely,

Very truly yours,
Ryokichi Higashiyama
Ryokichi Higashiyama
Director of Transportation

MELVIN N. NONAKA
Fire Chief

MNN:LJ:eya

cc: Dept. of Land Utilization

P.S. Reference: Your January 6th letter with enclosed amendments:
We are not changing above reply.

JAN 9 1981

JAN 13 1981

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU

630 SOUTH BETHANIA

HONOLULU, HAWAII 96841

EILEEN ANDERSON, Mayor
YOSHIE H. FUJIKAWA, Chairman
DAT QUON PANG, Vice Chairman
RYOKICHI HIGASHIONNA
Donna M. Howard
Michael J. Chum
ROBERTA SOUZA
CLAUDE T. YAMAMOTO

January 12, 1981

Mr. Ryokichi Higashionna, Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813

Reference to Letter: STP 8.6953

Dear Mr. Higashionna:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for your letter of January 9, 1981, on the abovementioned EIS Preparation Notice. Your concerns on the traffic impact and the setback provisions will be addressed in the Draft EIS. A summary of this information is provided below:

- 1) Project traffic: Using a high (or worst-case condition) figure of seven (7) trips per day per parking space (106 total parking spaces), 742 trips will be generated per day. Using a 10 percent portion of the ADT provides a peak hour figure of about 75 cars. Because the weekend peak would be of greater importance, the additional autos generated by this project was added to the weekend peak hours as well as the smaller, weekday peak hours. Based on the relatively small amount of automobiles added to the peak hour, little or no adverse impact on traffic is anticipated.
- 2) Setback from the Kaneohe Highway: The proposed building will be setback 36 feet from the property line (which is not adjacent to the highway). The property line begins approximately 15 feet from the highway's pavement. The parking spaces (for the project) are located 25 feet from the property line.

We appreciate your comments.

Very truly yours,

F. J. Rodriguez
F. J. Rodriguez

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

FJR:CR:1p1

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Your Letter of December 23, 1980, on the EIS Preparation Notice for Proposed Punaluu Shores Project

We do not have any objections to the proposed project. However, the EIS should indicate we are not making any water commitments in advance because of our tight water situation. Water commitment determinations for new developments are being made only when construction drawings or building permits are submitted to us for review and approval. Developments that require action by the City's Department of Land Utilization must receive approval from that department before we will take any action.

When we review your project, we cannot guarantee that water can be made available. The issuance of a water commitment will depend upon the adequacy of our system's reserve pumping capacity to serve your project.

The EIS should also discuss the potential impacts that sewage effluent disposal may have on water resources in the immediate and surrounding areas.

If you have questions or require additional information, please call Lawrence Whang at 548-5221.

Very truly yours,

Kazu Hayashida
KAZU HAYASHIDA
Manager and Chief Engineer

cc: Dept. of Land Utilization

KAZU HAYASHIDA
Manager and Chief Engineer

ENVIRONMENTAL
COMMUNICATIONS
INC.

January 30, 1981

Mr. Kazu Hayashida
Manager and Chief Engineer
Board of Water Supply
630 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Hayashida:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for your letter of January 12, 1981 on the abovementioned project.

We note that this project was initiated in 1973. By 1977, the project site was cleared and some site work was completed. At that point the developer chose to discontinue the site work. Presently, the developer wishes to continue the same project and now must resubmit the plans to various agencies for their review and approval.

The developer informs us that a water meter for the proposed project was approved and installed in 1977 (Account No. 664168434). Therefore, potable water is already available to the proposed development.

At this time, the developer is planning to install a sewage treatment plant which will provide for an equivalent of secondary treatment. Based on the quality of the treatment, no problems or adverse impact on water resources due to the effluent disposal in the immediate or surrounding area is anticipated.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:CKT:pi

cc: Mr. Walter S. S. Zacc
Environmental Quality Commission
Department of Land Utilization



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
71 SHAFTER HAWAII 96856

FODED-PV

13 January 1981

Mr. F. J. Rodriguez
Environmental Communications, Inc.
1152 Bishop Building, Suite 508
PO Box 526
Honolulu, HI 96809

Dear Mr. Rodriguez:

Per your letter requests dated 23 December 1980 and 6 January 1981, we have reviewed the City and County of Honolulu, Department of Land Utilization Environmental Impact Statement (EIS) Preparation Notice dated 6 October 1980 for the Punaluu Shores Project, Oahu and its amendment dated 5 November 1980. We have prepared the following comments.

a. There are no US Army Corps of Engineers' projects that would be affected by the proposed project, and there are no Corps regulatory requirements that are applicable.

b. The proposed project site is located within a tsunami inundation area where the tsunami elevation ranges from 8 to 10 feet above Mean Sea Level (Zone A4). Although a portion of the project site is within the coastal flood plain, it is not situated within the Coastal High Hazard Area as stated in the EIS Preparation Notice (Item C-2, see inclosure 1). A portion of the project site is not situated within any designated flood plain, but rather is located in an area of minimal flooding (Zone C).

Thank you for the opportunity to review the EIS Preparation Notice for this project.

Sincerely,

Kiuk Cheung
KIUK CHEUNG
Chief, Engineering Division

1 Incl
As stated

JAN 16 1981

GEORGE R. ARYOUSH
GOVERNOR

JOHN FARIAS, JR.
CHAIRMAN BOARD OF AGRICULTURE
YUKIO KITABAWA
DEPUTY TO THE CHAIRMAN



STATE OF HAWAII
DEPARTMENT OF AGRICULTURE
1428 SO. KING STREET
HONOLULU, HAWAII 96814

ENVIRONMENTAL
COMMUNICATIONS
INC.

January 26, 1981

January 14, 1981

Mr. Kiouk Cheung
Chief, Engineering Division
Department of the Army
U.S. Army Engineer District, Honolulu
Fort Shafter, Hawaii 96858

Dear Mr. Cheung:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for your comments of January 13, 1981, regarding the above-mentioned subject.

The information provided in your letter indicating that the Corps has no regulatory requirements for this project, and the site's A4 Flood Hazard Zone will be incorporated into the Draft EIS. This additional information is appreciated.

Very truly yours,

F. J. Rodriguez

FJL:CKT:ipi

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

Mr. Fred J. Rodriguez
Environmental Communications Inc.
1152 Bishop Building, Suite 508
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Re: Consultation Process Prior to Filing the EIS for
the Proposed Punaluu Shores Project
THK: 5-3-05:2, 38 - Walter S. S. Zane, W&C Ltd.

The Department of Agriculture has reviewed the subject notice and does not have any comments to offer at this time. We do appreciate the opportunity to comment.

Sincerely,

JOHN FARIAS, JR.
Chairman, Board of Agriculture

cc: Department of Land Utilization

JAN 16 1981

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU
630 SOUTH KING STREET
HONOLULU, HAWAII 96813



H. ANDERSON
CLERK

MICHAEL J. CHUN
DIRECTOR AND CHIEF ENGINEER

ENV 81-14

January 15, 1981

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Re: EIS Preparation Notice for the Proposed
Punaluu Shores Project

We have reviewed the subject notice and have the following comments.

1. The report on the proposed drainage system for the development is acceptable.
2. That portion of Kamehameha Highway fronting the project is owned by the State of Hawaii.
3. The proposed private sewage treatment plant is located outside the service area of the proposed Hauula-Punaluu disposal system under the 208 Plan. Therefore, the proposed facility should be constructed as a permanent installation without possibility of being abandoned and connected with the future municipal system.
4. Sludge handling facility and effluent disposal plans for the sewage treatment plant should be included and discussed in the EIS.
5. To be in conformance with the City's 208 Plan, a certified operator will have to be retained to operate the facility. Also, the proposed financial scheme to support the proper operation of the facility should be included as a matter of information.

Very truly yours,

Mike
MICHAEL J. CHUN
Director and Chief Engineer

cc: DLU
Engineering
WMM

F. J. RODRIGUEZ
PRESIDENT

January 30, 1981

Mr. Michael J. Chun,
Director and Chief Engineer
Department of Public Works
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Chun:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for your letter of January 15, 1981 on the abovesentioned preparation notice.

In response to your comments (Items 3, 4, and 5), we note that the information you requested on the sewage treatment plant will be in the Draft EIS. We appreciate your comments.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:CKT:pl

cc: Mr. Walter S. S. Zane
Environmental Quality Commission
Department of Land Utilization

JAN 20 1981



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
DEPARTMENT OF HEALTH
150 WAIKALUA BLVD.
ROOM 301
HONOLULU HAWAII 96813

HARRY Y. AKAGI
DIRECTOR
TELEPHONE NO
848-8813

Mr. F. J. Rodriguez
January 16, 1981
Page 2

Thank you for permitting us to review and make comments on this notice.

January 16, 1981

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: EIS Preparation Notice for the Proposed
Punaluu Shores Project

We have reviewed the subject EIS preparation notice and offer the following comments:

We note that the EIS is being prepared under Ordinance 4529 as amended. As such, the Department of Land Utilization will distribute the statements for agency and public review.

We note that the draft development plan for this windward area is for residential use and not for hotel-condominium use as being proposed by the applicant. Is the alternative of residential development under consideration?

The existing view planes will be altered considerably by the proposed seven-story, two-wing building. Drawings or photos depicting the proposed changes in views should be shown in the EIS.

The socio-economic impacts of the project, especially on the surrounding residents should be discussed.

Measures that would reduce the flood and tsunami hazard to the site should be discussed.

Sincerely,

Harry Y. Akagi
Acting Director

cc: BLU

JAN 19 1981

ENVIRONMENTAL
COMMUNICATIONS
INC.

January 30, 1981

Mr. Harry Y. Akagi, Acting Director
Office of Environmental Quality Control
Department of Health
550 Halekaunika Street, Room 301
Honolulu, Hawaii 96813

Dear Mr. Akagi:

Subject: EIS Preparation Notice for Proposed
Funaiuu Shores Project

Thank you for your letter of January 16, 1981, commenting on the above-mentioned EIS Preparation Notice. Below, are our responses to your comments and concerns.

- (1) "Is the alternative of residential development under consideration?"
The developer is not considering single-family residential use of the property. It should also be noted that 48 units (of a total 102 units) will be sold as residential condominium units.
- (2) "Drawings or photos depicting the proposed changes in views should be shown in the EIS."
We have requested that any visual aids now available be provided to us for inclusion in the EIS. If these are not available, we will provide a detailed description on the building's impact on the viewplane.
- (3) "The socio-economic impacts of the project, especially on the surrounding residents should be discussed."
The socio-economic impact on the community will be included in the Draft EIS.
- (4) "Measures that would reduce the flood and tsunami hazard to the site should be discussed."
The U.S. Corps of Engineers' letter, dated January 13, 1981, states:

"The proposed project site is located within a tsunami inundation area where the tsunami elevation ranges from 8 to 10 feet above Mean Sea Level (Zone A4). Although a portion of the project site is within the coastal flood plain, it is not situated within the Coastal High Hazard Area as stated in the EIS Preparation Notice"

Mr. Harry Y. Akagi, Acting Director
February 2, 1981
Page 2

(Item C-2, see Inclosure 1). A portion of the project site is not situated within any designated flood plain, but rather is located in an area of minimal flooding (Zone C)."

This information on flooding and any mitigation measures (if any) will be provided in the Draft EIS.

Very truly yours,



F. J. Rodrigues

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

FJR:CKT:pl



DEPARTMENT OF PLANNING AND ECONOMIC DEVELOPMENT

GEORGE R. ARYFISH
HERI TU KONO
FRANK SERAVANEK

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL COMMUNICATIONS INC.

January 19, 1981

January 28, 1981

Ref. No. 2611

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Mr. Hideto Kono, Director
Department of Planning and
Economic Development
State of Hawaii, Kanama Building
P. O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Rodriguez:

SUBJECT: Punaluu Shores Condominium, Environmental Impact
Statement Preparation Notice

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for giving us the opportunity to review the subject EIS Preparation Notice. We find that the document has adequately identified potential environmental, social and economic impacts which can be anticipated as a result of the proposed project.

Thank you for your comments of January 19, 1981. As indicated in the Notice, we will be discussing in greater detail the potential environmental, social, and economic impacts of the proposed project.

We have no further specific remarks to offer at this time, but would like the privilege of commenting further when the draft EIS is available for review.

Upon completion, we will submit copies of the Draft EIS to the Environmental Quality Commission for processing. A copy of the Draft EIS will be sent to your agency for review at that time.

Sincerely,

Hideto Kono

Very truly yours,

F. J. Rodriguez

FJR:CKT:ipi

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

cc: Office of Environmental Quality Control
Department of Land Utilization, City and County of Honolulu

JAN 22 1981

DEPARTMENT OF GENERAL PLANNING
CITY AND COUNTY OF HONOLULU
810 SOUTH KING STREET
HONOLULU, HAWAII 96813



N. P. ANDERSON
Director

WILLARD T. CHOW
Chief Planning Officer

DGP12/80-3528(GO)

January 20, 1981

Gentlemen:
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Environmental Impact Statement Preparation Notice for
Punaluu Shores Condominium, Punaluu, Koolauloa, Oahu
Comments Requested December 23, 1980

The assessment by the Department of Land Utilization generally outlines the areas of concern.

In our review of the impact statement, we will be particularly interested in the following area of concern:

Relationship of the project to the General Plan and the proposed Development Plans (DP's)

Although the Development Plan for Koolauloa is just a proposed plan at this time (with probable adoption in the near future), the goals and objectives embodied in this document must be considered when evaluating the merits of future developments for the following reasons:

1. The Development Plan was developed as part of a process of government/citizen interaction--a process that included an intensive citizen participation effort through the Neighborhood Boards and the Development Area Organizations. As such, the Development Plan is a statement of concerns of both the City and County and the residents of the Koolauloa community.
2. The present Detailed Land Use Maps allow a much greater intensity of urbanization than is prescribed by the current General Plan of the City and County of Honolulu. The proposed DP for the area recognizes this fact and specifies a land use pattern which implements the intent of the General Plan.

Environmental Communications, Inc.
Page 2

The intent of the proposed Development Plan is "... to protect and enhance the rural attractiveness of the area." To achieve this, "... views of the lateral Koolau ridge and deep inland valleys of southern Koolauloa should be maintained. Panoramic and continuous views of the coast and sea ... should also be protected."

The proposed Development Plan also states that: "Residents should be offered the opportunity to develop social patterns and lifestyles within a rural setting as expressed by neighborhoods or small housing clusters which are defined by open space boundaries, and which blend into the surrounding landscape with as little disruption as possible to the scenic quality of the area."

Further: "The intent is to minimize changes in existing communities in order to maintain the desired physical and social character and lifestyle."

Also, the proposed Development Plan for Koolauloa shows the entire project site in residential use. The intent of the DP is to maintain the entire area as a rural, low profile residential environment with a 25-foot height limit.

The impact statement should include discussions addressing the following questions:

1. How does the project relate to the goals and objectives of the City and County of Honolulu for the Koolauloa area, especially in light of the above statements as excerpted from the proposed DP?
 2. What are the community's attitudes toward building heights and future developments in the area?
- The proposed DP for the area further states that "Changes affecting the present physical and social nature of these areas shall be made only when community needs or public interests can be demonstrated."

Can the project be justified in light of this? Can community needs or general public interests be shown? What are Koolauloa Neighborhood Board No. 28's comments to these questions?

Thank you for affording us the opportunity to review the preparation notice.

Sincerely,

WILLARD T. CHOW
Chief Planning Officer

WTC:fmt

JAN 21 1981

ENVIRONMENTAL
COMMUNICATIONS
INC.

February 2, 1981

Mr. Willard T. Chow,
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Chow:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

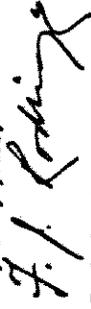
Thank you for your letter of January 20, 1981, regarding the above-mentioned EIS Preparation Notice. We would like to respond to your concerns and comments regarding the project's relationship to the City's General Plan and the proposed Development Plan and the "community's attitudes toward building heights and future developments in the area." As indicated in your discussion, the proposed project is not consistent with the goals and objectives set by the General Plan or the proposed Development Plan. However, the developer had, in 1976, obtained all the required permits, including the building permit for this project. Unfortunately, the project was not developed because of marketing constraints. It should also be noted that the zoning for the building area is designated B-1, Resort Hotel. We realize that there is a movement to preserve and protect the rural communities on Oahu. The ability of the island to sustain higher populations must be planned and land use restrictions implemented. However, in the case where the developer has the designated zoning and an investment in the property that reflects "the highest and best use," there will be conflicting priorities. Nationally, the courts are still determining the extent to which the property owner must be compensated for downzoning a property. However, the courts should consider the fact that the local government's action to not approve permits or issue approvals for a zoned property the equivalent of downzoning. We will include a discussion on the project's consistency with the General Plan and the proposed Development Plan in the Draft EIS. It will also be noted that the development is consistent with the present zoning.

During the EIS Consultation Period, the Punaluu Community Association and Koolauloa Neighborhood Board No. 28, indicated that the proposed building is incompatible with the surrounding neighborhood. Their position will be included in the Draft EIS, as well as a copy of their letter.

Mr. Willard T. Chow
February 2, 1981
Page 2

A copy of the Draft EIS will be sent to your organization for review this month.

Very truly yours,



F. J. Rodrigues

FJR:CKT:pi

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

PUNALUU COMMUNITY ASSOCIATION
P.O. Box 239
Hauula, Hawaii 96717

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

January 20, 1981

Mr. F. J. Rodriguez
Environmental Communications, Inc.
Post Office Box 536
Honolulu, Hawaii

Re: Punaluu Shores EISP Notice

Dear Sir:

The Punaluu Community Association has reviewed the Environmental Impact Statement Preparation Notice issued by the Department of Land Utilization relating to the proposed Punaluu Shores Project. Please be informed that the Punaluu Community Association and the Koolauloa Neighborhood Board #28 have taken a firm position against any further resort development in Punaluu and this is reflected in the proposed Development Plan.

The Association is in general agreement with the adverse impacts (II-A) listed by the Department of Land Utilization and we feel that it is imperative that they be thoroughly addressed. Although we accept that there would be impacts on our highway, scenic and visual environment, need for increased support services, real property values, etc., we would like to comment in detail about some of our concerns.

1. Private Sewage Treatment Plant: The proposed site is in a particularly sensitive area, situated in both the fresh water flooding and tsunami inundation zones. The site is in very close proximity to residential lots which may possibly be affected by odor, noise, and seepage. The effect of effluent seepage into the shoreline is of extreme concern as there is no reliable control of viral contamination. This in turn would pose a threat to marine life and restrict swimming and fishing in the ocean fronting the development which is designated Class AA Coastal Waters.
2. Population Increase: The projected population increase of 306 persons poses an impact on the recreational use of the shoreline fronting the project. This beach is popular with fishermen as well as families and small picnic groups. Communities in Koolauloa are considered stable residential areas. The influx of the projected 306 transient persons will have a major impact on the community and its support services.
3. Physical Structure: View plane will be obscured by the seven story structure which is not compatible with the scenic, rural, agricultural environment.

Sincerely,

Mr. Creighton U. Mattoon, President
Punaluu Community Association, Inc.

cc:

January 30, 1981

Mr. Creighton U. Mattoon, President
Punaluu Community Association, Inc.
P. O. Box 239
Hauula, Hawaii 96717

Dear Mr. Mattoon:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for your letter of January 20, 1981 on the above-mentioned preparation notice.

We will address your concern relating to the flood hazard zone, the sewage treatment plant, and the effect of sewage effluent on the shoreline. In regards to population increase, we note that 306 people is not a significant increase for the community. Although some impacts on the community and support services are expected, these impacts are not considered to be major or adverse. This subject will be elaborated upon in the Draft EIS. Finally, impact on the view plane will be discussed in the Draft EIS. We would concur that this proposed development will partially obscure view planes looking from makai to mauka.

We are at present preparing a Draft EIS and anticipate that a copy will be sent to your organization for review and comments.

Very truly yours,

F. J. Rodriguez

FJR:CKT:pi

cc: Mr. Walter S. S. Zane
Environmental Quality Commission
Department of Land Utilization

JAN 23 1981

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
HONOLULU MUNICIPAL BUILDING
480 SOUTH KING STREET
HONOLULU, HAWAII 96813



L. M. ANDERSON
MAYOR

ROY A. PARKER
DIRECTOR
TE12/80-3546

January 21, 1981

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

Subject: Your letter dated December 23, 1980 Regarding
Consultation Process Prior to Filing the EIS for
the Proposed Punaluu Shores Project
TMK: 5-3-05: 2, 3B

We have reviewed your submittal and recommend that the access roads
from the project site to Kanehameha Highway be coordinated with the
State Department of Transportation since Kanehameha Highway is under
their jurisdiction. In addition, the access roads should include side-
walk areas to accommodate pedestrian traffic.

Very truly yours,

Roy Parker
ROY A. PARKER
Director

RAP:dy

ENVIRONMENTAL
COMMUNICATIONS
INC.

January 28, 1981

Mr. Roy A. Parker, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Parker:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for your letter of January 21, 1981. We note that the
ingress/egress to the project site from Kanehameha Highway has been
coordinated with and previously been approved by the State Department
of Transportation.

We also note that there is no "access road" per se. The ingress/
egress will lead directly to a parking area for the project.

Very truly yours,

F. J. Rodriguez
F. J. Rodriguez

FJR:CKT:pi

cc: Mr. Walter S. S. Zans
Department of Land Utilization
Environmental Quality Commission

JAN 23 1981



United States Department of the Interior

FISH AND WILDLIFE SERVICE

100 ALA MOANA BOULEVARD
P. O. BOX 50783
HONOLULU, HAWAII 96850

ES
Room 6307

January 22, 1981

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Re: EIS - Preparation Notice
Punaluu Shores Project
Punaluu, Oahu, Hawaii

Dear Mr. Rodriguez:

We have reviewed the subject Environmental Impact Statement (EIS) preparation notice concerning the proposed development of a seven-story, two-wing condominium building at Punaluu, Oahu, Hawaii.

Although we agree that endangered species probably do not inhabit the project site, nearby wetlands may provide habitat for endemic and endangered waterbirds, and the project site may be transmitted by these birds. The EIS must address all potential direct or indirect impacts on these species including their flyways.

We are most concerned with the potential impacts a point discharge of treated sewage effluent will have on aquatic biota, and would oppose such a discharge into any freshwater stream or wetland, as well as onto the shallow reef flat immediately offshore from the project site. Extension of the outfall to deeper ocean waters at the reef's edge would be costly and also would create adverse impacts on fishery resources. These impacts must be addressed in the EIS.

In view of these potential impacts, we recommend also that the National Marine Fisheries Service be consulted regarding the preparation of this EIS

We appreciate this opportunity to comment.

Sincerely yours,

F. J. Rodriguez
F. J. Rodriguez
Deputy Project Leader for
Environmental Services

cc: Department of Land Utilization
Conservation National Marine Fisheries Service
Honolulu, Hawaii Division Fish & Game
ENR-207



Save Energy and You Serve America!

JAN 26 1981

ENVIRONMENTAL
COMMUNICATIONS
INC.

February 2, 1981

F. J. RODRIGUEZ
PRESIDENT

Mr. Nevin D. Holmberg
Deputy Project Leader for
Environmental Services
U.S. Department of the Interior
Fish and Wildlife Service
P. O. Box 50167
Honolulu, Hawaii 96850

Dear Mr. Holmberg:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

Thank you for responding to the EIS Preparation Notice for the above-mentioned project. We have reviewed your concerns and provide the following responses:

1. The "nearby wetlands" are not identified in your letter. However, reviewing the various publications on wetlands on Oahu, the nearest "wetland" is located in Kahana Valley (reference: "An Ornithological Survey of Hawaiian Wetlands, Volume Two," prepared by Ahuimanu Productions for U.S. Army, Engineer District, Honolulu, December, 1977). This is located over 2.0 miles from the project site, over a ridge (on the Kaneohe side on the project side). With this distance, we feel that review of flyways would be unnecessary.
2. The sewage effluent would receive secondary treatment and be disposed of via injection wells on the project site. This would have much lesser impact than the present cesspools used by the surrounding homes.
3. The period for the EIS consultation is completed; the National Marine Fisheries Service will be sent a copy of the draft EIS for review.

We appreciate your concerns in this matter.

Very truly yours,

F. J. Rodriguez
F. J. Rodriguez

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

FJR:CKT:pi

ENVIRONMENTAL
COMMUNICATIONS
INC.

February 2, 1981

Mr. Melvin K. Koizumi
Deputy Director for
Environmental Health
State of Hawaii, Department
of Health
P. O. Bx 3378
Honolulu, Hawaii 96801

Dear Mr. Koizumi:

Subject: EIS Preparation Notice for the Proposed
Punaluu Shores Project

Thank you for your response to the abovementioned EIS Preparation Notice. We have reviewed your concerns and provide the following information:

- 1) The information provided in your letter (items 1 through 6) is correct.
- 2) Regarding items 5 and 6, on the permit to operate application, the developer or his agent will be responding to your letter and will be requesting such an application.
- 3) The plans of the current project are identical to those approved on November 25, 1981. This will be verified at a later date by the architectural or engineering consultant.

- * 4) If the project has violated Section 3.9 of Chapter 38 (which relates to the non-issuance or revoking of the building permit after the approval of the treatment system), the developer intends to resubmit the plans for the treatment plant for the Department of Health' review and approval.

Your comments are appreciated.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

cc: Mr. Walter S. S. Zana
Department of Land Utilization
Environmental Quality Commission

FJR:CKT:pl



LIFE OF THE LAND
A GROUP FOR ENVIRONMENTAL RESEARCH AND ACTION

LIFE OF THE LAND
250 S. Hotel St., Rm. 211
Honolulu, HI 96813
Tel: 521-1300

Mr. F. J. Rodriguez
Environmental Communications, Inc.
Post Office Box 536
Honolulu, Hawaii
96809

Re: Punaluu Shores EISP Notice

Dear Sir:

Life of The Land is extremely concerned about possible adverse impacts of the proposed project on the Punaluu shoreline and community. LOL is especially interested in the social, growth and wastewater treatment aspect of this project and hope they will be adequately addressed. We wish to remain a consulted party and look forward to reviewing the draft EIS.

Sincerely,

Borothy D. Letts

Borothy D. Letts
Executive Director

cc: DLU

DDL: co'n

* Based on past correspondence from the Department of Health (see page E-9) the applicant is not in violation of Section 3.9 of Chapter 38.

JAN 23 1981

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

October 15, 1980

January 28, 1981

KUNANI O HAUULA
c/o Joseph Kalili
Post Office Box 71
Hauula, HI 96717

MR. FREDERICK K. F. LEE, AICP
53 Country Club Road
Honolulu, Hawaii 96817

Subject: Punaluu Shores Project
53-382 Kam Highway
Tax Map Key No. 5-3-05; 02 & 03
Owner: Walter Zane

Dear Mr. Lee:

According to records of the Department of Land Utilization, City and County of Honolulu, you are the Authorized Agent for the above named project.

By letter dated October 6, 1980, the Department of Land Utilization advised Mr. Fred J. Rodriguez, of Environmental Communications, Inc., that under provisions of Ordinance No. 4529, an Environmental Impact Statement (EIS) is required for the subject project. Mr. Rodriguez prepared an Environmental Assessment for the project.

We note in the communication to Mr. Rodriguez, under item IV., "Suggested Agencies to be Consulted in Preparation of EIS," a list of Community Organizations. We would be pleased if you would include our organization for consultation.

Our organization is vitally interested in being informed of projects such Punaluu Shores and would welcome the opportunity to share in the knowledge to be gained from informal and open discussions.

I may be reached at 293-8782 or, you may call our organization Secretary, Mrs. James (Ipo) Zane, at 293-1713.

We will appreciate hearing from you at your earliest convenience.

Yours very truly,

KUNANI O HAUULA

Joseph Kalili
Joseph Kalili, Treasurer

cc: Walter Zane
Department of Land Utilization

Mr. Dorothy B. Letts
Executive Director
Life of the Land
250 South Hotel Street, Room 211
Honolulu, Hawaii 96813

Dear Ms. Letts:

Subject: EIS Preparation Notice for Proposed
Punaluu Shores Project

We received your letter on the abovementioned project on January 23, 1981. The Draft Environmental Impact Statement now being prepared will provide additional information relating to socioeconomic and wastewater treatment impacts. A copy of the Draft EIS will be sent to your organization for review in the month of February.

We appreciate your comments.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:CKT:pl

cc: Mr. Walter S. S. Zane
Department of Land Utilization
Environmental Quality Commission

13. REPRODUCTION OF COMMENTS AND RESPONSES MADE DURING THE DRAFT EIS REVIEW PERIOD

The Draft EIS was distributed on March 6, 1981, by the Department of Land Utilization to the agencies indicated on Table 3. A total of twenty two (22) letters responding to the Draft EIS were received. Of this total six (6) agencies had no comments to offer. Table 4 provides a list of agencies responding, and identifies the page on which a half-sized copy of the letter begins. A half-size reduction of the written response to letters with comments immediately follows.

It is noted that several agencies had substantial comments to offer. In responding to their comments, additional information was obtained and is included in this Final EIS. The reviewer should especially consider reviewing the comments and responses to the Board of Water Supply, Department of General Planning, Water Resources Research Center, Environmental Center, Office of Environmental Quality Control, Life of the Land, Punaluu Community Association, and the Department of Land Utilization. These agencies provided various comments which in some instances offer a opposing view of the impacts discussed in the Draft EIS document.

TABLE 3

PUNALUU SHORES PROJECT
DISTRIBUTION LIST FOR THE DRAFT EIS

AGENCY NAME

City and County of Honolulu

Department of Land Utilization
Department of General Planning
Department of Transportation Services
Department of Parks and Recreation
Department of Public Works
Board of Water Supply
Department of Housing & Community
Development
Mass Transit Division
Building Department
Honolulu Fire Station
Honolulu Police Station

State of Hawaii

Office of Environmental Quality Control
Department of Agriculture
Department of Land and Natural Resources
Department of Health
Department of Planning and Economic
Development
Department of Defense
Department of Accounting and General
Services
Department of Social Services and
Housing
Department of Transportation
Department of Education
Historic Sites Division, Department
of Land and Natural Resources
State Energy Office
Environmental Center, University of
Hawaii at Manoa
Water Resources Research Center,
University of Hawaii at Manoa

Federal

Department of the Army, Corps of
Engineers
U.S. Department of Interior, Fish
and Wildlife

Table 3
Punaluu Shores Project
Distribution List for the Draft EIS

AGENCY NAME

Utilities

Hawaiian Electric Company
Hawaiian Telephone Company

Other Organizations

American Lung Association of Hawaii
Life of the Land
Kunani O Hauula
Outdoor Circle
Koolauloa Neighborhood Board No. 28
Punaluu Community Association

Distributed by Department of Land Utilization on March 6, 1981.

TABLE 4

PUNALUU SHORES PROJECT
AGENCIES RESPONDING TO THE DRAFT EIS

<u>Agency</u>	<u>Date of Comment</u>	<u>Date of Response</u>	<u>Page No.</u>
<u>Agencies Having No Comments</u>			
Department of Agriculture	1/14/81	--	54
U.S. Department of the Interior, Fish and Wildlife	3/17/81	--	54
Department of Defense	3/19/81	--	55
Department of Housing and Community Development, City & County of Honolulu	3/16/81	--	55
Department of Transportation, State of Hawaii	4/03/81	--	56
Building Department, City & County of Honolulu	3/12/81	--	56
<u>Agencies With Comments</u>			
Honolulu Police Department	3/13/81	4/01/81	57
Board of Water Supply	3/19/81	4/01/81	59
Department of Public Works	3/23/81	4/01/81	60
Fire Department	3/23/81	4/01/81	61
Hawaiian Electric Company, Inc.	3/23/81	4/01/81	62
Department of Education, State of Hawaii	3/24/81	4/08/81	63
Department of Health, State of Hawaii	3/25/81	4/21/81	64
Department of General Planning, City & County of Honolulu	3/27/81	4/21/81	65
Water Resources Research Center, University of Hawaii at Manoa	3/31/81	4/21/81	67
Environmental Center, University of Hawaii at Manoa	4/01/81	4/21/81	70
Department of Planning and Economic Development, State of Hawaii	4/01/81	4/21/81	74
Hawaiian Telephone Company	4/01/81	4/21/81	75
Office of Environmental Quality Control, State of Hawaii	4/02/81	4/21/81	76
Life of the Land	4/02/81	4/21/81	79
Punaluu Community Association	4/02/81	4/21/81	83
Department of Land Utilization, City & County of Honolulu	4/06/81	4/21/81	94



STATE OF HAWAII
DEPARTMENT OF AGRICULTURE
1422 SO KING STREET
HONOLULU, HAWAII 96814

KIMBERLY S. JONES, JR.
COMMISSIONER, DEPARTMENT OF AGRICULTURE
YUKIO KITAGAWA
DEPUTY TO THE COMMISSIONER



United States Department of the Interior

FISH AND WILDLIFE SERVICE
300 ALA MOANA BOULEVARD
P. O. BOX 50167
HONOLULU, HAWAII 96860

IN REPLY REFER TO:
ES
Room 6307

March 17, 1981

January 14, 1981

Mr. Fred J. Rodriguez
Environmental Communications Inc.
1152 Bishop Building, Suite 508
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Re: Consultation Process Prior to Filing the EIS for
the Proposed Punaluu Shores Project
THK: 5-3-05:2, 3C - Walter S.S. Zane, WRC Ltd.

The Department of Agriculture has reviewed the subject notice
and does not have any comments to offer at this time. We do
appreciate the opportunity to comment.

Sincerely,

JOHN FARIAS, JR.
Chairman, Board of Agriculture

cc: Department of Land Utilization

No Response Required



APR - 7 1981

Save Energy and You Serve America!

MAR 31 1981

Department of Land Utilization
City and County of Honolulu
ATTN: Environmental Affairs Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Re: DEIS - Punaluu Shores Project
Punaluu, Oahu, Hawaii

Gentlemen:

We have reviewed the referenced material and find that due to its nature,
the proposed project will have no significant deleterious impact on fish
and wildlife resources. Please do not hesitate to call on us if we may
be of further assistance.

We appreciate the opportunity to comment.

Sincerely yours,

William B. Lennan II
William B. Lennan II
Acting Deputy Project Leader
for Environmental Services

No Response Required

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813
PHONE 433-4101



SILEEN R. ANDERSON
MAYOR

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3448 DIAMOND HEAD ROAD, HONOLULU, HAWAII 96813



GEORGE N. ANTONIO
Sergeant

VALENTINE A. SEIFEMANN
MAJOR GENERAL
ADJUTANT GENERAL

LEONARD E. HO
MAJOR GENERAL
ADJUTANT GENERAL
DAVID A. C. HO
LIEUTENANT
DEPUTY ADJUTANT GENERAL

JOSEPH K. CONAI
DIRECTOR

HIENG

March 16, 1981

Department of Land Utilization
City & County of Honolulu
ATTENTION: Environmental Affairs Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Gentlemen:

Punaluu Shores

UN

Thank you for providing us the opportunity to review your proposed project, Punaluu Shores Environmental Impact Statement.

We have completed our review and have no comments to offer at this time.

Yours truly,

JERRY M. MATSUDA
Captain, HANG
Contr & Engr Officer

No Response Required

MAR 31 1981

Department of Land Utilization
City and County of Honolulu
Honolulu, Hawaii

Attention Environmental Affairs Branch

Gentlemen:

Subject: Punaluu Shores Project
Draft Environmental Impact Statement

We have reviewed the subject draft environmental impact statement and have no comment.

Thank you for forwarding the EIS for our perusal.

Very truly yours,

Joseph K. Conai
Director

No Response Required

MAR 31 1981

CITY AND COUNTY OF HONOLULU

HONOLULU MUNICIPAL BUILDING
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



EILEEN M. ANDERSON
MAYOR

ROY H. TANJI
DIRECTOR AND BUILDING SUPERINTENDENT

PB 81-202

BUILDING DEPARTMENT

March 12, 1981

TO: MR. MICHAEL M. MCELROY, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: ROY H. TANJI
DIRECTOR AND BUILDING SUPERINTENDENT

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR PROPOSED PUNALUU SHORES PROJECT

We have no comments to offer on the subject draft

EIS.

ROY H. TANJI
Director and Building Superintendent

AF:jo
cc: J. Harada

No Response Required

APR - 7 1981

RECEIVED

'81 APR 6 PM 1:45

LAND
USE
DIVISION
HONOLULU
CITY AND COUNTY

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION

April 3, 1981

STP 8.7184

Mr. Michael M. McElroy
Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Draft Environmental Impact Statement
Punaluu Shores Project

Thank you for the opportunity to comment on the subject matter.

We have no substantive comments to offer which could improve the document.

Very truly yours,

Myokichi Higashionna
Director of Transportation

No Response Required

APR - 7 1981

CITY AND COUNTY OF HONOLULU

1485 SOUTH BERTANHA STREET
HONOLULU, HAWAII 96814 - AREA CODE (808) 935-3111

G. ANDERSON
MAYOR



FRANCIS KEALA
CHIEF

Mr. Michael M. McElroy

-2-

March 13, 1981

FOR REFERENCE EC-ES

The emphasis of the hotel on transient visitors and part-time residents, who are not familiar with the area and its traffic flow, and other traffic problems, creates a situation much different from that of the average residential condominium.

March 13, 1981

Sincerely,

FRANCIS KEALA
Chief of Police

Mr. Michael M. McElroy
Director of Land Utilization
Department of Land Utilization
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

ATTENTION: Environmental Affairs Branch

Dear Mr. McElroy:

Draft EIS for Punahoa Shores Project

The Honolulu Police Department's primary concerns about this project still rest with traffic safety. While traffic congestion due to increased numbers has been minimized by the consultants and may not appear to be a significant problem, the fact that traffic is required to make a left turn (coming from Kaulahe) from a road that is single lane in each direction, may very often create a traffic obstruction. This can even be a dangerous situation during hours of darkness or inclement weather. At a minimum, it is recommended that the entrance(s) to the hotel be well lighted and signed.

NOTE: The text of the draft EIS states that a single 22' wide ingress/egress to Kaulaheha Highway is proposed (Page 4, Paragraph 6.). The site plan accompanying the EIS is contradictory, indicating two (2) 22' wide ingress/egress locations.

A second potential hazard exists in the "convenient access to the beach" (Page 3, Paragraph 2.1). If not presently existing, a crosswalk may need to be considered in the immediate vicinity of the hotel because of the need for guests to cross the highway to reach the beach or to reach the Kahuku-bound buses.

MAR 31 1981

ENVIRONMENTAL
COMMUNICATIONS
INC.

April 1, 1981

F. J. RODRIGUEZ
PRESIDENT

Mr. Francis Keala
Chief of Police
Police Department
City and County of Honolulu
1455 South Beretania Street
Honolulu, Hawaii 96814

Dear Mr. Keala,

Subject: Draft Environmental Impact Statement for the
Proposed Punaluu Shores Project

Thank you for your letter of March 13, 1981, regarding the abovementioned Draft EIS.

In response to your comments, we note the following:

- 1) The text of the Draft EIS was incorrect on the ingress/egress for the proposed project; the Final EIS will be corrected to indicate that two, 22-foot wide entrances to Kamehameha Highway are planned. This will make the text consistent with the Site Plan.
- 2) The Punaluu area being rural in nature does not have many crosswalks. It is expected that the pedestrians will use their discretion in crossing the highway with care. However, this matter will be discussed with Department of Transportation.

We appreciate your concern and comments in this matter.

Very truly yours,



F. J. Rodriguez

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S. S. Zane
James K. Tsugawa, AIA & Associates

FJR:CKT:pl

BY AUTHORITY OF DIRECTOR
RESERVED BY TAMA
HONOLULU, HAWAII 96813

YOSHIE H. FURUKAWA, Chairman
DAI OLION PANG, Vice Chairman
RYOKICHI MUGASHIONNA
RODNEY N. HOWARD
MICHAEL J. CHRIS
ROBERTA A. SOUZA
CLAUDE T. YAMAMOTO



March 19, 1981

TO : MR. MICHAEL M. MCELROY
DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM : KAZU HAYASHIDA
BOARD OF WATER SUPPLY

SUBJECT: YOUR LETTER OF MARCH 6, 1981, ON THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED
PUNALAU SHORES PROJECT

KAZU HAYASHIDA
Manager and Chief Engineer

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

April 1, 1981

Mr. Kazu Hayashida
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Hayashida,

Subject: Draft Environmental Impact Statement for the
Proposed Punalau Shores Project

Thank you for your comments of March 19, 1981, relating to the above-mentioned Draft EIS.

In response to your comments, we would like to provide the following information:

- 1) The owner has requested that the 3-inch compound meter be reinstalled. A letter to the Board of Water Supply by the Developer is attached.
- 2) The plans for the injection well will be submitted to you for review and approval by the Developer's sewage treatment plant consultant.
- 3) Your letter of February 24, 1981 was reviewed by the Developer's sewage treatment plant consultant. His response is attached for your information.

We appreciate your comments on this matter.

Very truly yours,
F. J. Rodriguez
F. J. Rodriguez

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S. S. Zane
James K. Tsugawa, AIA & Associates
Bill's Crane Service, Inc.

FJR:CKT:pi

We have the following comments on the environmental impact statement:

1. On page 5, we concur that potable water is available to the project site. However, the existing 5/8-inch water meter (Account #664168454) is inadequate to serve the proposed development. A 3-inch compound meter was installed for the proposed project in 1975 and was later "ordered off." According to our present policy, water is committed to the project if the owner orders the meter to be "ordered on" before February 28, 1984.
2. The proposed sewage treatment and disposal system is not anticipated to affect existing potable groundwater resources if the effluent is discharged by gravity flow into an injection well that is less than 30-feet deep. The plans for any injection well deeper than 30-feet or proposal to pump the effluent into the injection well must be submitted to us for review and approval. Data on water quality and boring logs should be included with the submittal.

If you have questions or require additional information, please call Lawrence Whang at 548-5221.

Raymond
KAZU HAYASHIDA
Manager and Chief Engineer

MAR 31 1981

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



EILEEN R. ANDERSON
MAYOR

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

April 1, 1981

MICHAEL J. CHUN
DIRECTOR AND CHIEF ENGINEER

ENV 81-121

March 23, 1981

MEMORANDUM

TO: MR. MICHAEL M. McELROY, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: MICHAEL J. CHUN, DIRECTOR AND CHIEF ENGINEER

SUBJECT: EIS FOR THE PROPOSED PUNALUU SHORES PROJECT

We have reviewed the subject EIS and have the following comments.

1. The proposed project is located in a Federal Insurance Administration Flood Hazard Area and must comply with the applicable ordinances.
2. The sludge handling procedures outlined in the letter on page E-6 should be incorporated in the EIS.

William C. Bond
MICHAEL J. CHUN
Director and Chief Engineer

Mr. Michael J. Chun
Director and Chief Engineer
Department of Public Works
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Chun,

Subject: Draft Environmental Impact Statement for the Proposed Punaluu Shores Project

Thank you for your comments of March 23, 1981 on the abovementioned Draft EIS.

In response to your comments, we note that:

- 1) the project will comply with the applicable Flood Hazard Ordinances.
- 2) the information on page E-6 will be incorporated in the Final EIS as requested.

Your concern on these matters is appreciated.

Very truly yours,
F. J. Rodriguez
F. J. Rodriguez

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S. S. Zane
James K. Tsugawa, AIA & Associates

FJR:CKT:pi

MAR 31 1981

CITY AND COUNTY OF HONOLULU

1455 S. BERETANIA STREET, ROOM 305
HONOLULU, HAWAII 96814

EILEEN R. ANDERSON
MAYOR



M. M. NONAKA
CHIEF

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

April 1, 1981

Mr. Melvin M. Nonaka, Fire Chief
Fire Department
City and County of Honolulu
1455 South Beretania Street, Room 305
Honolulu, Hawaii 96814

Dear Mr. Nonaka,

TO: MR. MICHAEL M. MEELROY, DIRECTOR
DEPARTMENT OF LAND UTILIZATION
ATTENTION: ENVIRONMENTAL AFFAIRS BRANCH
FROM: MELVIN M. NONAKA, FIRE CHIEF
SUBJECT: ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED
PUNALUU SHORES PROJECT

March 23, 1981

Subject: Draft Environmental Impact Statement for the
Proposed Punaluu Shores Project

Thank you for your response of March 23, 1981 on the abovementioned
Draft EIS.

The information provided in your letter on the location and response time
of the nearest fire station will be included in the Final EIS.

We have no objections to the Punaluu Shores project. The Hamala Fire
Station is approximately two miles and four minutes away from the pro-
posed project. Supportive service will be provided by the Kaaawa Sta-
tion which is five miles and eight minutes away. Our chief concern is
that the developer observes all fire prevention regulations while the
project is being constructed.

We would also like to assure you, that the project plans will meet the
applicable fire codes and fire prevention regulations.
We appreciate your comments on this matter.

Should you have any questions, please call Assistant Chief Lawrence
Suganuma at 955-8304.

Very truly yours,

F. J. Rodriguez

MELVIN M. NONAKA,
Fire Chief

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S. S. Zane
James K. Tsugawa, AIA & Associates

MNR:IS:clt

FJR:CKT:pl

MAR 31 1981

HAWAIIAN ELECTRIC COMPANY, INC.

Box 2750 Honolulu, Hawaii 96840

REINHOLD O'CONNELL, P.E.
MANAGER, ENVIRONMENTAL DEPARTMENT

March 23, 1981

ENV 2-1
NV/G

ENVIRONMENTAL
COMMUNICATIONS,
INC.

April 1, 1981

F. J. RODRIGUEZ
PRESIDENT

Mr. Richard L. O'Connell
Manager, Environmental Department
Hawaiian Electric Company, Inc.
P. O. Box 2750
Honolulu, Hawaii 96840

Department of Land Utilization
City & County of Honolulu
Attention: Environmental Affairs Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Mr. O'Connell,

Subject: Draft Environmental Impact Statement for the
Proposed Punaluu Shores Project

Thank you for your letter of March 23, 1981, commenting on the above-mentioned Draft EIS.

Subject: Draft Environmental Impact Statement
for the Proposed Punaluu Shores Project

We will incorporate your comments into the Draft EIS document and indicate that HECO does not anticipate that this project will have detrimental impact on electrical services and facilities.

Thank you for the opportunity to review the proposed project. At the present time, we can see no impact on HECO's transmission/distribution and substation facilities that will be caused by the project.

We appreciate your comments on this matter.

Very truly yours,

Sincerely,

F. J. Rodriguez

Richard L. O'Connell
Manager, Environmental Department

JFB:ca1

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S. S. Zane
James K. Tsugawa, AIA & Associates

FJR:CKT:rp1

MAR 31 1981



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 1742
HONOLULU, HAWAII 96813

March 24, 1981

OFFICE OF THE SUPERINTENDENT

Mr. Michael M. McElroy, Director
Department of Land Utilization
City and County of Honolulu
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

SUBJECT: Draft Environmental Impact Statement
Punaluu Shores Project

Our review of the draft EIS for the subject project indicates that it will have a negligible impact on enrollment at Haunala Elementary School and Kahuku High-Intermediate School.

Should there be any questions, please contact Mr. Howard Lau at 737-5231.

Sincerely,

Charles C. Clark
CHARLES C. CLARK
Superintendent

CGC:HL:jl

cc: Windward District

ENVIRONMENTAL
COMMUNICATIONS
INC.

April 8, 1981

F. J. RODRIGUEZ,
PRESIDENT

Mr. Charles G. Clark
Superintendent
Department of Education
State of Hawaii
P. O. Box 2360
Honolulu, Hawaii 96804

Dear Mr. Clark,

Subject: Draft Environmental Impact Statement for
Proposed Punaluu Shores Project

Thank you for your comments of March 24, 1981, on the proposed Draft EIS for Punaluu Shores Project.

We will include your comments in the appropriate section of the Final EIS for the Punaluu Shores Project.

We appreciate your comments on this matter.

Very truly yours,

F. J. Rodriguez
F. J. Rodriguez

cc: Environmental Quality Commission
Department of Land Utilization
James K. Tsugawa, AIA & Associates
Mr. Walter S. S. Zane

FJR:CKT:pl

AN EQUAL OPPORTUNITY EMPLOYER

APR - 8 1981



STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

MARCH 25, 1981

GEORGE A. L. TEEN
DIRECTOR OF HEALTH

VERNA C. WAITE, M.D.
DEPUTY DIRECTOR OF HEALTH

HENRY N. THOMPSON, M.A.
DEPUTY DIRECTOR OF HEALTH

JAMES S. SHAWMACK, PH.D.
DEPUTY DIRECTOR OF HEALTH

TAMMIE BEHNEY
DEPUTY DIRECTOR OF HEALTH

In reply, please refer to:
File # EPMS-88

MEMORANDUM

To: Mr. Michael M. McElroy, Director of Land Utilization
City & County of Honolulu

From: Deputy Director for Environmental Health

Subject: Environmental Impact Statement (EIS) for Proposed Punaluu Shores
Project, Punaluu, Koolauloa District, Island of Oahu

Thank you for allowing us to review and comment on the subject EIS.

As of this date the owner and/or his engineer has not submitted plans
of the treatment works such that we can compare the latest plans with those
that we previously approved in 1975.

We strongly recommend that the owners consider complying with the amended
provisions of Public Health Regulations, Chapter 38, Private Wastewater
Treatment Works & Individual Wastewater Systems which include:

1. Clearer lines of responsibility for the project owner and engineer;
2. Increased disposal capacity requirement; and
3. More specific operation and maintenance manual.

If you should have any questions, please feel free to contact Harold Yee
of the Pollution Technical Review Branch at 548-6410.

Melvin K. Koizumi
MELVIN K. KOIZUMI

cc: DEQC

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

April 21, 1981

Mr. Melvin K. Koizumi, Director
Department of Health
State of Hawaii
P. O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Koizumi:

Subject: Draft Environmental Impact Statement for
Proposed Punaluu Shores Project

Thank you for your response of March 25, 1981 regarding the above-
mentioned Draft EIS.

We have discussed with the developer the compliance of the sewage
treatment plant with Chapter 38. He has indicated that the sewage
treatment plant consultant will submit the appropriate plans to
your department and shall work out the requirements as necessary.

Thank you for your concern on this matter.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

cc: Environmental Quality Commission
Department of Land Utilization
James K. Tsugawa, AIA & Associates
Mr. Walter S. S. Zane

FJR:CKT:pl

APR - 8 1981

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



EILEEN R. ANDERSON
MAYOR

WILLARD T. CHOW
CHIEF PLANNING OFFICER

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

DGP3/81-739 (RK)

April 21, 1981

March 27, 1981

MEMORANDUM

TO: Mr. Michael M. McElroy, Director
Department of Land Utilization

SUBJECT: Draft Environmental Impact Statement
for the Proposed Punaluu Shores Project

Regarding the subject draft EIS, we can only reiterate our earlier comments of the project, i.e., its conflict with the objectives and policies of the adopted General Plan and the proposed development plan for the area. Future land use proposals view preservation of the rural setting. Existing uses of the surrounding areas are typically low-rise developments of predominantly single-family residences, open space and agriculture. The addition of a 7-story, 102-unit resort/condominium at a highly visible Kamehameha Highway location will eventually represent an irreversible long-term incompatible commitment (in use and height) of a fairly large site and a potential for substantial degradation of the area's environmental quality.

Additionally, the question of time sharing of the individual units as an alternative arrangement has not been discussed. All units are expected to be sold as condominium units with the two-bedroom units used primarily as a vacation home. What safeguards will be made to prevent a time sharing operation from entering the Punaluu community?

Ralph Kawamoto

RALPH KAWAMOTO
Staff Planner

APPROVED:

Willard T. Chow

WILLARD T. CHOW

Mr. Ralph Kawamoto
Staff Planner
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Kawamoto:

Subject: Draft Environmental Impact Statement for
the Proposed Punaluu Shores Project

Thank you for your response of March 27, 1981, regarding the above-mentioned Draft EIS.

Our responses to your comments are as follows:

Comment: Regarding the subject draft EIS, we can only reiterate our earlier comments of the project, i.e., its conflict with the objectives and policies of the adopted General Plan and the proposed development plan for the area.

Response:

The conflict with the proposed Development Plan was noted on pages 2, 11, 14, 17, and 34.

Comment: Future land use proposals view preservation of the rural setting. Existing uses of the surrounding areas are typically low-rise developments of predominantly single-family residences, open space and agriculture. The addition of a 7-story, 102-unit resort/condominium at a highly visible Kamehameha Highway location will eventually represent an irreversible long-term incompatible commitment (in use and height) of a fairly large site and a potential for substantial degradation of the area's environmental quality.

APR - 8 1981

Mr. Ralph Kawamoto
April 21, 1981
Page 2

Response:

We concur that a 7-story hotel structure would be inconsistent with the surrounding building heights (primarily residential). However, we note that the zoning of the property allows this usage and building height. The property was zoned in 1966, prior to the construction of many of the adjacent houses. Subsequently, the potential of having a high-rise hotel on the site was known to some residents. While the building and use is not consistent with the surrounding area, it is noted that it is highly subjective to consider the proposed height a "substantial degradation". For example, Pat's at Punaluu, a 7-story structure, does not appear to be overly obtrusive in its present setting.

Comment: Additionally, the question of time sharing of the individual units as an alternative arrangement has not been discussed. All units are expected to be sold as condominium units with the two-bedroom units used primarily as a vacation home. What safeguards will be made to prevent a time sharing operation from entering the Punaluu community?

Response:

We have discussed, with the developer, this aspect of time-sharing units. While the final marketing plan has not been determined, the developer has indicated that the units will be sold, and the use of that unit by the private owner(s) must comply with the applicable laws. Subsequently, time-sharing is a possibility; this would not be unlike a hotel operation in terms of visitors and occupancy. Further purchasers would most likely be local individuals who would use the unit for a vacation home.

We appreciate your concerns on this matter.

Very truly yours,



V. J. Rodriguez

cc: Environmental Quality Commission
Department of Land Utilization
James K. Teugawa, AIA & Associates
Mr. Walter S. S. Zane

FJR:CKT:p1



University of Hawaii at Manoa

Water Resources Research Center
Holmes Hall 203 • 2540 Dole Street
Honolulu, Hawaii 96822

31 March 1981

Dept. of Land Utilization
City & County of Honolulu
ATTENTION: Environmental Affairs Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Gentlemen:

Subject: Draft EIS for the Proposed Punaluu Shores Project,
Punaluu, Koolauloa District, Oahu, March 1981

We have reviewed the subject DEIS and offer the following comments:

1. It is disconcerting to read generalized, undocumented and unverified statements such as the following:

(a) P.1 "Probable Environmental Impacts: } Impacts on the physical environment is not anticipated to be significant or adverse". This is a generalized judgmental statement which should perhaps be left for the accepting agency to determine. The implication, whether the text supports it or not, is to lead the reader to so conclude even before reading the report. A summary of documented facts, developed further in the text, would be appropriate.

(b) P.14, sec 5.5(a) "Minimal impact on water quality is expected". Because the sewage effluent meets the criteria of the Health Department's Chapter 38 does not necessarily mean that the water quality impacts will be minimal. Nutrients, for example, will be left in the water and the water table is only 4.5 ft below the surface. No water quality data on the existing groundwater is presented; therefore, it would be difficult to determine if there will or will not be significant impacts.

(c) Ibid "Based on the drainage plan, the total storm runoff will not be significantly greater than the existing storm runoff". First, based on the site plan, approximately 2/3 of the site's ground-surface will be rendered impermeable by buildings and pavement. In other words, virtually all precipitation will runoff from those areas to contribute to total runoff. Such being the case, where is the data to justify stating that "...total storm runoff will not be significantly greater...?"

Dept. of Utilization
31 March 1981
Page 2

Second, peak runoff frequently increases in developed areas because man-made drainage systems are designed to remove water quickly and efficiently to minimize water damage. The higher peak can cause problems downstream if the volume is increased beyond the channel's capacity.

(d) Ibid "The chemical content of the stormwater discharge will be similar to the urban stormwater runoff characteristics of the surrounding commercial/residential areas". The area surrounding this site is predominantly open and undeveloped, not commercial/residential. Developed areas occur as a narrow strip along Kamehameha Highway.

2. Will the sewage treatment plant be adequately protected from possible tsunami inundation?

This material has been reviewed by WHRC and affiliate personnel. Thank you for the opportunity to comment.

Sincerely,

Edwin T. Murabayashi

Edwin T. Murabayashi
EIS Coordinator

ETM:jm

cc: C. Liu
Y.S. Fok
H. Gee
Environmental Center

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

April 21, 1981

Mr. Edwin T. Murabayashi, EIS Coordinator
Water Resources Research Center
2540 Dole Street
Holmes Hall 283
Honolulu, Hawaii 96822

Dear Mr. Murabayashi,

SUBJECT: Draft Environmental Impact Statement for the
Proposed Punahoa Shores Project

Thank you for your letter of March 31, 1981 commenting on the above-mentioned Draft EIS. Below, we have taken each of your comments and responded to each on an item by item basis.

Comment:

1. (a) P.1 "Probable Environmental Impacts: 1) Impacts on the physical environment is not anticipated to be significant or adverse". This is a generalized judgmental statement which should perhaps be left for the accepting agency to determine. The implication, whether the text supports it or not, is to lead the reader to so conclude even before the reading report. A summary of documented facts, developed further in the text, would be appropriate.

Response: This statement was contained in the Summary and is felt to be substantiated in the text of the Draft EIS document. The purpose of the Summary is to provide, in a succinct fashion, the findings of the text; subsequently this statement is felt to be appropriate.

Comment:

1. (b) P.14, sec 5.5(a) "Minimal impact on water quality is expected". Because the sewage effluent meets the criteria of the Health Department's Chapter 38 does not necessarily mean that the water quality impacts will be minimal. Nutrients, for example, will be left in the water and the water table is only 4.5 ft below the surface. No water quality data on the existing groundwater is presented; therefore, it would be difficult to determine if there will or will not be significant impacts.

Water Resources Research Center
April 21, 1981
Page 2

Response: Enclosed are letters from the Board of Water Supply (dated March 19, 1981) and Bill's Crane Service, Inc. (the consultant for the sewage treatment plant). The letter from the Board of Water Supply (BWS), states:

"The proposed sewage treatment and disposal system is not anticipated to affect existing potable groundwater resources if the effluent is discharged by gravity flow into an injection well that is less than 30-feet deep. The plans for any injection well deeper than 30-feet or proposal to pump the effluent into the injection well must be submitted to us for review and approval. Data on water quality and boring logs should be included with the submittal."

The letter from Bill's Crane Service, Inc. states:

"I would like to emphasize that the treated effluent from this proposed development will be of far higher quality than the untreated sewage flowing into the ground from a typical cesspool serving a single family residence. Therefore, concern should be focused on the existing cesspools in the area that pose a greater threat to the health and environment of the community."

Additional information on the coastal water quality to establish baseline information would prove to be extremely costly and time-consuming. Given the size of the project and the higher level of sewage treatment provided (in comparison to the adjacent cesspools) such a study would appear to be impractical and unnecessary. Also, in 1976, Gordon Dugan, Ph.D., prepared a study of water quality impact on a proposed residential project in the Punahoa area. In regards to the affect of effluent on the receiving water, Dugan stated:

"The affect that the effluent from private sewage disposal systems will have on the receiving water, after passing through the soil zone, is nearly impossible to ascertain with a high degree of confidence, inasmuch as the following factors are not accurately known: the length and direction of the subsurface flow path; the type of substratum the effluent is flowing through and what effect it has on the constituent contained in the effluent; the dilution factor, both in the subsurface and the fronting ocean; and the dispersion patterns of coastal waters."

Comment:

1. (c) Ibid "Based on the drainage plan, the total storm runoff will not be significantly greater than the existing storm runoff". First, based on the site plan, approximately 2/3 of the site's ground-surface will be rendered impermeable by buildings and pavement. In other words, virtually all

precipitation will runoff from those areas to contribute to total runoff. Such being the case, where is the data to justify stating that "...total storm runoff will not be significantly greater...?"

Second, peak runoff frequently increases in developed areas because man-made drainage systems are designed to remove water quickly and efficiently to minimize water damage. The higher peak can cause problems downstream if the volume is increased beyond the channel's capacity.

Response: The Drainage Study prepared by R. M. Tovill Corp. will be included in the appendices of the Final EIS. This Study will provide the detailed information requested. Briefly, the Study states:

"The lot will be filled to elevation 9.5 feet for both the sewage treatment plant and the apartment area. The hotel building will have a first floor elevation of 10.0 feet. The site grading was designed to drain as much of the onsite storm runoff to the existing ditch along the southern boundary to reduce flooding that exists in the low-lying area to the west of the property. The existing ditch (south boundary) will be cleared and should aid in relieving the existing flooding in the low-lying area."

"The onsite drainage improvements being proposed are a grass swale to drain the western area of the site and concrete channel section to drain the northeast part of the site."

"The proposed grading and drainage plan shown in Figure 3 is necessary to keep the apartment-hotel complex and sludge treatment plant from being inundated during large storms. By directing the storm water falling on the project property to the highway culvert and cleaning the existing ditch leading to the culvert, a beneficial, rather than detrimental, effect is anticipated for the surrounding low-lying area."

The final receiving waters for stormwater runoff will be the coastal area along Punaluu Beach.

Comment:

1. (d) EIS "The chemical content of the stormwater discharge will be similar to the urban stormwater runoff characteristics of the surrounding commercial/residential areas". The area surrounding this site is predominantly open and undeveloped, not commercial/residential. Developed areas occur as a narrow strip along Kanehameha Highway.

Response: The surrounding commercial/residential areas referred to was the strip development along Kanehameha Highway.

Comment:

2. Will the sewage treatment plant be adequately protected from possible tsunami inundation?

Response: The grading plan calls for the elevation of the STP above the flood hazard level.

Thank you for your comments and concern regarding the Draft EIS.

Very truly yours,


F. J. Rodriguez

Enclosures

cc: Department of Land Utilization
Environmental Quality Commission
James K. Tsugawa, AIA & Associates
Mr. Walter S.S. Zane



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 946-7361

Office of the Director

Mr. Michael M. McElroy
Department of Land Utilization
City and County of Honolulu
Attention: Environmental Affairs Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Review of
Draft Environmental Impact Statement
Proposed Punaluu Shores Project
Punaluu, Koolauloa District, Oahu

The Environmental Center review of the above Draft EIS has been conducted by
Jacquelin N. Miller and Alexis Cheong Linder.

Section 3. The Affected Environment

The reconnaissance soil studies indicate that the ground water level was encountered about 4.5 feet below the surface (p. 7). If injection wells are to be utilized for sewage effluent disposal this could lead to contamination of ground water and possibly subsequent seepage into coastal waters. In turn, the excess load of effluent constituents in coastal waters could contribute to eventual violation of class AA water quality parameters. What is the proposed design of the injection wells? A comprehensive evaluation of the effects on ground water levels or coastal waters is difficult without more information on the proposed injection wells. Such pertinent information should be included as part of the revised EIS. Baseline information on the water quality of the ground water and coastal waters should be gathered and included in the revised EIS. This will permit long term meaningful evaluation of the effects of the injection well discharges on these waters.

Section 3.2. Economic Impacts

If the proposed project is implemented, due to the higher value and use of the property, surrounding residential and commercial property values will also be indirectly increased (p. 13). This could have long term effects on the resident population in the forms of increased rents and property taxes. Thus, implementation of the project could have long-term economic effects on the population. This impact coupled with the inconsistency of the

Mr. Michael M. McElroy

-2-

April 1, 1981

proposed project with surrounding use, non-conformance with the forthcoming development plans (p. 14, 31, 34) as well as community opposition should result in a more careful assessment of the social-economic impacts on the community.

Section 3.5. Impact on Environmental Quality

- (a) Due to the extensive paving of the project site we would expect the total storm runoff to be greater than the existing storm runoff in contrast to the statement on page 14.

We note that surface runoff will be channeled by an existing culvert into Punaluu Stream (p. 5). Will the existing culvert be adequate to handle the expected increase in runoff due to paving? What effect will this added runoff have on the water quality of Punaluu Stream and the coastal water quality?

- (b) Flood insurance. Will the proposed project conform to national flood insurance requirements for construction in a coastal flood plain?

Section 3.7. Impact on Infrastructure and Support Services

- (a) The letter from the Board of Water Supply of January 12, 1981 does not guarantee that water can be made available until the City's Department of Land Utilization requirements are met and construction drawings or building permits are obtained. Statements in Section 3.7 (a) on page 15 and Section 2.6 (a) on page 5 give the impression that potable water needs will be met by the Board of Water Supply. Such statements should be altered in the revised EIS to reflect the uncertainty of the water supply in accordance with the statements from the Board of Water Supply of January 12, 1981.

Following are several areas we feel are inadequate and must be discussed in the forthcoming revision:

1. There is no comprehensive discussion of the proposed injection wells as to design, operation, maintenance or projected impacts on coastal or ground water quality. It is not sufficient to merely state that coastal water quality standards will be maintained nor that public health water quality parameters will be complied with; a comprehensive assessment governed by the application and provision of appropriate data should be included as part of the EIS.
2. How will sludge disposal be handled? Will it be accomplished by the city or the developer? Who will be responsible for the operation and maintenance of the sewage treatment plant in short run terms? in long-run terms? Does the developer plan to eventually turn over operation and maintenance of the STP to the city?

APR - 8 1981

AN EQUAL OPPORTUNITY EMPLOYER

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

Mr. Michael M. McElroy

-3-

April 1, 1981

3. The imaginary view of the building from the makai perspective appears to be a seven-storied wall which would prohibit an aesthetically pleasing view of the Koolau Mountain range. Additionally if development should occur mauka of this proposal makai views would be obstructed. Has the developer considered alternative building designs such as staggering building heights or Cluster development? Such designs would be more compatible with the rural environment and enhance viewplanes as well. What provisions have been made for alternate energy devices to meet building and resident needs? Are provisions made in the building design to promote fire safety?

Thank you for the opportunity to review this DEIS. We look forward to your response.

Yours truly,

Diane C. Drigot, Ph.D.
Acting Director

LK

cc: OEQC
Environmental Communications
Jacquelin Miller
Alexis Cheong Linder

April 21, 1981

Dr. Diane C. Drigot, Acting Director
Environmental Center, University of Hawaii
at Manoa
Crawford 317, 2550 Campus Road
Honolulu, Hawaii 96822

Dear Dr. Drigot,

SUBJECT: Draft Environmental Impact Statement for the Proposed Punaluu Shores Project

On April 8, 1981, we received your letter of April 1, 1981, on the above-mentioned project. We have carefully reviewed your concerns with both the project's developer and the architectural consultant. Below, responses to each of your concerns are provided.

Section 3. The Affected Environment

Comment: The reconnaissance soil studies indicate that the ground water level was encountered about 4.5 feet below the surface (p. 7). If injection wells are to be utilized for sewage effluent disposal this could lead to contamination of ground water and possibly subsequent seepage into coastal waters. In turn, the excess load of effluent constituents in coastal waters could contribute to eventual violation of class AA water quality parameters. What is the proposed design of the injection wells? A comprehensive evaluation of the effects on ground water levels or coastal waters is difficult without more information on the proposed injection wells. Such pertinent information should be included as part of the revised EIS. Baseline information on the water quality of the ground water and coastal waters should be gathered and included in the revised EIS. This will permit long term meaningful evaluation of the effects of the injection well discharges on these waters.

Response: Enclosed are letters from the Board of Water Supply (dated March 19, 1981) and Bill's Crane Service, Inc. (the consultant for the sewage treatment plant). The letter from the Board of Water Supply (BWS), states:

"The proposed sewage treatment and disposal system is not anticipated to affect existing potable groundwater resources if the effluent is discharged by gravity flow into an injection well that is less than 30-feet deep. The plans for any injection well deeper than 30-feet or proposal to pump the effluent into the injection well must be submitted to us for review and approval. Data on water quality and boring logs should be included with the submittal."

The letter from Bill's Crane Service, Inc. states:

"I would like to emphasize that the treated effluent from this proposed development will be of far higher quality than the untreated sewage flowing into the ground from a typical cesspool serving a single family residence. Therefore, concern should be focused on the existing cesspools in the area that pose a greater threat to the health and environment of the community."

The final design of the injection wells will be determined based on the results of soil borings. Additional information on the coastal water quality to establish baseline information would prove to be extremely costly and time-consuming. Given the size of the project and the higher level of sewage treatment provided (in comparison to the adjacent cesspools) such a study would appear to be impractical and unnecessary. Also, in 1976, Gordon Dugan, Ph.D., prepared a study of water quality impact on a proposed residential project in the Punaluu area. In regards to the effect of effluent on the receiving water, Dugan stated:

"The effect that the effluent from private sewage disposal systems will have on the receiving water, after passing through the soil zone, is nearly impossible to ascertain with a high degree of confidence. Inasmuch as the following factors are not accurately known: the length and direction of the subsurface flow path; the type of substratum the effluent is flowing through and what effect it has on the constituent contained in the effluent; the dilution factor, both in the subsurface and the fronting ocean; and the dispersion patterns of coastal waters."

(Source: "Household Sewage Treatment and Disposal Considerations for the Punaluu Beach Cluster Development, Punaluu, Koolauloa, Oahu, Hawaii," prepared by Gordon L. Dugan, Ph.D., March 8, 1976.)

Section 5.2. Economic Impacts

Comment: If the proposed project is implemented, due to the higher value and use of the property, surrounding residential and commercial property values will also be indirectly increased (p. 13). This could have long term effects on the resident population in the forms of increased rents and property taxes. Thus, implementation of the project could have long-term economic effects on the population. This impact coupled with the inconsistency of the proposed project with surrounding use, non-conformance with the forthcoming development plans (p. 14, 31, 34) as well as community opposition should result in a more careful assessment of the social-economic impacts on the community.

Response: We do not concur with your statement that the proposed project may have long-term effects on the residents' population in

form of increased rents. Whatever effect this will contribute to rent increases has already been established by Hanohano Hale and Pat's of Punaluu. There is already a statement in the Draft EIS which states that the proposed project may increase property taxes. The Draft EIS also states that there is formal community opposition. It would appear that a community survey would result in the same conclusion. Subsequently, further assessment for socioeconomic impact would serve no additional purpose than to confirm community opposition.

Section 5.5. Impact on Environmental Quality

Comment:

(a) Due to the extensive paving of the project site we would expect the total storm runoff to be greater than the existing storm runoff in contrast to the statement on page 14.

We note that surface runoff will be channeled by an existing culvert into Punaluu Stream (p. 5). Will the existing culvert be adequate to handle the expected increase in runoff due to paving? What effect will this added runoff have on the water quality of Punaluu Stream and the coastal water quality?

(b) Flood insurance. Will the proposed project conform to national flood insurance requirements for construction in a coastal flood plain?

Response:

(a) The Drainage Study prepared for the proposed project will be included in the Final EIS (copy enclosed) substantiating the statement that impact on the drainage will be minimal.

The existing culvert will be cleared and is expected to adequately handle the expected runoff. The water quality in Punaluu Stream and the coastal receiving waters is not expected to significantly change. The project will not contribute a significant amount of additional runoff to the Stream and subsequently the coastal receiving waters would not be adversely affected.

(b) The architectural consultant indicates that no flood insurance is required. However, it is noted that the first floor of the hotel will be above the flood level (the ground level under the hotel will be used for parking). Further, the developer will comply with any flood insurance requirements that he is not aware of at this time.

Section 5.7. Impact on Infrastructure and Support Services

Comment:

- (a) The letter from the Board of Water Supply of January 12, 1981 does not guarantee that water can be made available until the City's Department of Land Utilization requirements are met and construction drawings or building permits are obtained. Statements in Section 5.7 (a) on page 15 and Section 2.6 (a) on page 5 give the impression that potable water needs will be met by the Board of Water Supply. Such statements should be altered in the revised EIS to reflect the uncertainty of the water supply in accordance with the statements from the Board of Water Supply of January 12, 1981.

Response: The BWS letter of March 19, 1981 (enclosed), indicates that potable water is indeed available to the site and that: "According to our present policy, water is committed to the project if the owner orders the meter to be 'ordered on' before February, 1984." Walter Zane, the developer, has requested that the 3-inch compound meter be reinstalled (see enclosed letter dated March 3, 1981). Subsequently, potable water is available and committed to the project site.

Comment:

1. There is no comprehensive discussion of the proposed injection wells as to design, operation, maintenance or projected impacts on coastal or ground water quality. It is not sufficient to merely state that coastal water quality standards will be maintained nor that public health water quality parameters will be complied with; a comprehensive assessment governed by the application and provision of appropriate data should be included as part of the EIS.

Response: See first response to Section 3. The Affected Environment.

Comment:

2. How will sludge disposal be handled? Will it be accomplished by the city or the developer? Who will be responsible for the operation and maintenance of the sewage treatment plant in short run terms? In long-run terms? Does the developer plan to eventually turn over operation and maintenance of the STP to the city?

Response: The sludge would be trucked away (by the STP operators) and disposed of at an appropriate landfill or other approved sites. The developer has retained Bill's Crane Services, Inc. to construct and maintain the STP. Short- and long-term plans call for the private operation and maintenance of the STP.

Comment:

3. The imaginary view of the building from the makai perspective appear to be a seven-storied wall which would prohibit an aesthetically pleasing view of the Koolau Mountain range. Additionally if development should occur mauka of this proposal (sic) makai views would be obstructed. Has the developer considered alternative building designs such as staggering building heights or cluster development? Such designs would be compatible with the rural environment and enhance viewplanes as well. What provisions have been made for alternate energy devices to meet building and resident needs? Are provisions made in the building design to promote fire safety?

Response: The view from the makai to mauka direction will be partially obscured by the project. This is noted in the Draft EIS. The architect has indicated that the building's design is one in which he found economical and efficient and that the building's exterior will be aesthetically pleasing and not just "a wall". At this time no energy saving devices are included in the plans. The building plans incorporate fire protection devices as required by the present fire codes.

We appreciate this opportunity to respond to your comments.

Very truly yours,


F. J. Rodriguez

Enclosures

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S. S. Zane
James K. Tsugawa, AIA & Associates
Bill's Crane Service, Inc.

FJR:CWT:pl



DEPARTMENT OF PLANNING AND ECONOMIC DEVELOPMENT

Kamamalu Building, 740 South King St. Honolulu, Hawaii - Mailing Address P.O. Box 2389 Honolulu, Hawaii 96804

GEORGE W. WILSON, Director
HIDEOKINO, Director
DANK SRIVANAK, Director

April 1, 1981
81 APR 6 PM 1:41

OFFICE OF LAND
REF. DIVISION
C & C HONOLULU

Mr. Michael M. McElroy, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

ATTENTION: Environmental Affairs Branch

Dear Mr. McElroy:

SUBJECT: Draft Environmental Impact Statement for the Proposed Punaluu Shores Project, Punaluu, Oahu

We have reviewed the above document and wish to offer the following comments for your consideration.

As identified in the draft EIS, the applicant proposes to construct a seven story building on the 1.768 acre site. A total of 102 units will be provided, 54 of which are considered "lodging" units (i.e., hotel rooms) without kitchen facilities, while the remaining 48 units will be two bedroom condominiums which are proposed to be sold to potential buyers for a vacation type residence (see Statement of Objectives, page 3).

In this regard, the draft EIS identifies that while the proposed project is consistent with the State and County land use designation and existing zoning, it is not consistent with the General Plan for the City and County of Honolulu, nor the proposed Development Plan for the koolauloa area.

As the proposed project includes a substantial number of what could be considered vacation units, we believe the applicant should also review the objectives, policies and recommendations of the draft State Tourism Plan. The primary purpose of the State Tourism Plan is to provide State policy and direction to guide the growth and development of the visitor industry. Several policies in the draft Tourism Plan refer to the need for adequate visitor-oriented services which would be relevant to this project.

Thank you for the opportunity to review and comment on this matter.

Sincerely,

Hideto Kono

cc: Office of Environmental Quality Control

ENVIRONMENTAL COMMUNICATIONS INC.

F. J. RODRIGUEZ, PRESIDENT

April 21, 1981

Mr. Hideto Kono, Director
Department of Planning and Economic Development
State of Hawaii, Kamamalu Building
P. O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Kono:

Subject: Draft Environmental Impact Statement for the Proposed Punaluu Shores Project

We have received and reviewed your response of April 1, 1981, on the above-mentioned Draft EIS.

As suggested in your letter, we will review the proposed State Tourism Plan to determine the proposed project's consistency with the Draft Plan. Attached please find a portion of the Final EIS narrative which provides this comparative discussion.

Thank you for your concern on this matter.

Very truly yours,

F. J. Rodriguez

Attachment

cc: Environmental Quality Commission
Department of Land Utilization
James K. Tsugawa, AIA & Associates
Mr. Walter S. S. Zane

FJR:CXT:pi

APR - 7 1981

ENVIRONMENTAL COMMUNICATIONS INC.

ENVIRONMENTAL COMMUNICATIONS INC.

F. J. RODRIGUEZ, PRESIDENT

April 1, 1981

April 21, 1981

Department of Land Utilization
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Attention: Environmental Affairs Branch
Gentlemen:

Mr. Richard Mau
Engineering & Construction
Staff Manager
Hawaiian Telephone Company
P. O. Box 2200
Honolulu, Hawaii 96841

Dear Mr. Mau:

Subject: Draft Environmental Impact Statement (EIS) for the Proposed Punaluu Shores Project, Punaluu, Koolauloa District, Oahu

Subject: Draft Environmental Impact Statement for the Proposed Punaluu Shores Project

We have reviewed the subject Draft EIS and have no objections to its contents nor to the proposed project. However, we would like to call your attention to Section 2, Paragraph 2.6 (d) on page 4 of the EIS regarding telephone facilities. Although telephone overhead lines exist along Kamehameha Highway, they are of insufficient capacity to service the proposed project. Consequently, a new overhead cable will be constructed on existing poles along Kamehameha Highway from our Laie Switching Center to the project site, a distance of approximately five miles. This new cable will be of sufficient capacity to meet all telephone requirements of the project as well as projected future requirements along the cable route for the next seven years.

Thank you for your response of April 1, 1981, regarding the above-mentioned Draft EIS.

We will include the information provided to us in the narrative of the Final EIS.

We appreciate this additional information and your concern on this matter.

Thank you for allowing us to comment on this Draft EIS. Should you have any questions regarding our comments, please call me at phone 546-3650.

Very truly yours,

F. J. Rodriguez
F. J. Rodriguez

Sincerely Yours,

Richard Mau
Engineering & Construction
Staff Manager

cc: Environmental Quality Commission
Department of Land Utilization
James K. Tsugawa, AIA & Associates
Mr. Walter S. S. Zane

FRJ:CKT:pl

APR - 9 1981



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

800 MALDEN AVENUE, 8T
ROOM 301
HONOLULU, HAWAII 96813

HARRY Y. AKAGI
ACTING DIRECTOR
TELEPHONE NO. 546-8915

Mr. Michael M. McElroy
April 2, 1981
Page 2

1975 Socio-economic update (page A-1) states, "As such, most of the visitors advocate retaining the rural atmosphere and find further urbanization is undesirable." (emphasis added)

It is clearly stated in the EIS that the proposed project is not consistent with the General Plan or the proposed Development Plan for this rural area. The applicant should be made aware that Section 205A-26 (2), HRS clearly states, "No development shall be approved unless the authority has first found . . . (c) that the development is consistent with the county general plan, zoning and subdivision codes and other applicable ordinances."

5) Page 18. The no action alternative would also support the existing county general plan, as would residential use of the site.

6) Page 19. The statement implies that only a few people are concerned with open space values and scenic resources. The value of open space and scenic resources within the special management areas is an expressed concern of legislators and a broad spectrum of the public and is reflected in the Coastal Zone Management Act.

7) Page 20. What mitigation measures are proposed to decrease the local opposition to the project and its non-conformance with the General Plan? These are cited under adverse environmental impacts.

8) Page 21. As stated in comment #4, the relationship of this project to the objectives and policies of the coastal zone management area should be thoroughly discussed in this EIS.

9) Page 22. The EIS was not filed with the Environmental Quality Commission in accordance with the EIS Regulations. The Commission, for informational purposes only, and at the request of the Department of Land Utilization, published the preparation notice under the Register of Shoreline Protection Act Documents.

10) Page 42. How can it be stated that there are no unresolved issues? There should be a discussion on local

April 2, 1981

Mr. Michael M. McElroy
Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Environmental Impact Statement for the Proposed
Punaluu Shores Project

We have reviewed the subject statement and offer the following comments:

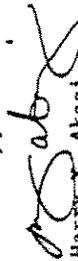
- 1) Page 5. How close will the sewage treatment plant be to the surrounding existing residential and commercial structures?
- 2) Page 6. No mention is made of satisfying the park dedication ordinance. Users of the hotel may cross Kamehameha Highway to the beach and create a pedestrian hazard. Will a crosswalk be incorporated in the plans?
- 3) Page 11. Chapter 343, Hawaii Revised Statutes was enacted in 1974 and in this case, does not directly apply to this proposed project.
- 4) Page 14. There should be a detailed discussion on how this project relates to the objectives and policies of Chapter 205A, HRS. The statement, "the future residents and visitors living within the site desire this type of setting," is speculative at best. We note that the quoted

Mr. Michael M. McElroy
April 2, 1981
Page 3

opposition to the project, the non-conformance with the general plan and on any overriding reasons why the project should proceed without resolving these problems.

Thank you for allowing us to review this statement.

Sincerely,


Harry Y. Akagi
Acting Director

ENVIRONMENTAL
COMMUNICATIONS
INC.

April 21, 1981

Mr. Harry Y. Akagi, Acting Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Mr. Akagi,

SUBJECT: Draft Environmental Impact Statement for the Proposed
Funaluu Shores Project

We have received and reviewed your letter of April 2, 1981. Below, on an item by item basis, your comments have been addressed.

Comment:

1) Page 5. How close will the sewage treatment plant be to the surrounding existing residential and commercial structures?

Response: Approximately 200 to 300 feet.

Comment:

2) Page 6. No mention is made of satisfying the park dedication ordinance. Users of the hotel may cross Kaehameha Highway to the beach and create a pedestrian hazard. Will a crosswalk be incorporated in the plans?

Response: The developer informs us that the Park Dedication Ordinance will be satisfied by using the recreational areas within the site and by monetary contribution.

Comment:

3) Page 11. Chapter 343, Hawaii Revised Statutes was enacted in 1974 and in this case, does not directly apply to this proposed project.

Response: This is correct; reference to the preparation of the document for Chapter 343 will be deleted.

Comment:

4) Page 14. There should be a detailed discussion on how this project relates to the objectives and policies of Chapter 205A, HRS. The statement, "the future residents and visitors living

cc: Environmental Communications, Inc.

within the site desire this type of setting," is speculative at best. We note that the quoted 1975 Socio-economic update (page A-1) states, "As such, most of the visitors advocate retaining the rural atmosphere and find further urbanization is undesirable." (emphasis added)

Response: Chapter 205A will be reviewed and discussion on how this project is consistent or inconsistent Chapter 205A objectives or policies will be provided in the Final EIS.

Comment:

5) Page 18. The no action alternative would also support the existing county general plan, as would residential use of the site.

Response: This is correct and will be noted in the Final EIS.

Comment:

6) Page 19. The statement implies that only a few people are concerned with open space values and scenic resources. The value of open space and scenic resources within the special management areas is an expressed concern of legislators and a broad spectrum of the public and is reflected in the Coastal Zone Management Act.

Response: The statement will be modified so that open space and scenic values are identified as resources.

Comment:

7) Page 20. What mitigation measures are proposed to decrease the local opposition to the project and its non-conformance with the General Plan? These are cited under adverse environmental impacts.

Response: No mitigation measures are proposed to decrease local opposition or make the project comply with the General Plan. These are matters which are not easily resolved; subsequently, the development must be judged on the basis of these liabilities.

Comment:

8) Page 21. As stated in comment #4, the relationship of this project to the objectives and policies of the coastal zone management area should be thoroughly discussed in this EIS.

Response: This will be incorporated into the Final EIS.

Comment:

9) Page 22. The EIS was not filed with the Environmental Quality Commission in accordance with the EIS Regulations. The Commission, for informational purposes only and at the request of the Department of Land Utilization, published the preparation notice under the Register of Shoreline Protection Act Documents.

Response: This is correct and will be noted in the Final EIS.

Comment:

10) Page 42. How can it be stated that there are no unresolved issues? There should be a discussion on local opposition to the project, the non-conformance with the general plan and on any overriding reasons why the project should proceed without resolving these problems.

Response: The inconsistency with the General Plan is noted. This is not an unresolved issue because the project is consistent with the zoning of the parcel. The unresolved issue lies in the City's decision to place the zoning in line with the General Plan. This is a matter which would apply to other properties as well as this project site. Subsequently, it is not a "problem" which can be resolved by the proposed project. Also, the local opposition to the project is a acknowledged condition. This is not an unresolved problem.

We appreciate your concerns on these matters.

Very truly yours,


F. J. Rodriguez

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S.S. Zane
James K. Tsugawa, AIA & Associates

FJR:CKT:pl



APRIL 2, 1981

Mr. Fred Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Subject: Draft EIS for the proposed Punaluu Shores Project

Dear Mr. Rodriguez:

We have reviewed your EIS and have the following comments to offer. As stated in the draft EIS the project does not conform with the City and County General Plan nor with the proposed Development Plan for the Koolauloa area. The Development Plan specifically addresses the preservation of view planes from Kam Highway the EIS admits that the project will disrupt the view planes. The Development Plan also allows for future resort development in the Koolima area only, this project is in conflict with that policy. The project is also in conflict with the proposed State Tourism Functional Plan.

The following are our comments in specific areas.

Traffic: The traffic analysis we feel is inadequate as it does not address cumulative impacts.

Sewage: There is no information regarding the impact of the injection wells for the proposed sewer treatment plant on the coastal ecosystem. Specifically where does the effluent end up in the ground water, the stream of the coastal ecosystem and what is its effect on any or all of these ecosystems. Section 5.5 (b) discusses elevating the sewer treatment plant. If you elevate the sewer treatment plant site what is the effect in increased runoff and flooding to the surrounding properties? Is the treatment plant within the tsunami zone and if so what precautions are being taken? Are the injection wells within the flood and tsunami zones and if so how does this effect their viability?

Drainage: The EIS does not adequately address drainage. Section 5.5 (a) does not deal with the amount of storm runoff generated nor does it deal with the streams ability to handle this runoff in peak periods. The surrounding area is rural and outside of Pat's we do not know of an area where 2/3 of the surface area is paved therefore we would like to see further analysis of the composition, amount and method of handling drainage.

In conclusion we feel that the current proposal is inappropriate for the area and may adversely effect the shoreline area. We also find inadequate data in the EIS on which to draw final conclusions.

Sincerely,

Dee Dee Letts
Dee Dee Letts
Executive Director

APR 6 1981

ENVIRONMENTAL
COMMUNICATIONS
INC.

Life of the Land
April 21, 1981
Page 2

April 21, 1981

Ms. Dee Dee Letts, Executive Director
Life of the Land
404 Piikoi Street
Honolulu, Hawaii 96814

Dear Ms. Letts,

SUBJECT: Draft Environmental Impact Statement for the Proposed
Punaluu Shores Project

We have received and reviewed your letter of April 2, 1981, on the above-mentioned Draft EIS. To address your concerns we have responded to each of your comments, on an item by item basis, below.

Comment:

Traffic: The traffic analysis we feel is inadequate as it does not address cumulative impacts.

Response: The project's 636 vehicular trips are expected to occur during non-peak hours. The traffic at this point on Kamehameha Highway reflects a higher weekend usage with little noticeable week day peaks. Considering the schedule of the visitors, it would be expected that their vehicular trips would be limited to off-peak hour periods except for weekends. The present volume along Kamehameha Highway will be included in the Final EIS.

Comment:

Sewage: There is no information regarding the impact of the injection wells for the proposed sewer treatment plant on the coastal ecosystem. Specifically where does the effluent end up in the ground water, the stream of the coastal ecosystem and what is its effect on any or all of these ecosystems. Section 5.5 (b) discusses elevating the sewer treatment plant. If you elevate the sewer treatment plant site what is the effect in increased runoff and flooding to the surrounding properties? Is the treatment plant within the tsunami zone and if so what precautions are being taken? Are the injection wells within the flood and tsunami zones and if so how does this effect their viability?

Response: Enclosed are letters from the Board of Water Supply (dated March 19, 1981) and Bill's Crane Service, Inc. (the consultant for the sewage treatment plant). The letter from the Board of Water Supply (BWS), states:

"The proposed sewage treatment and disposal system is not anticipated to affect existing potable groundwater resources if the effluent is discharged by gravity flow into an injection well that is less than 30-feet deep. The plans for any injection well deeper than 30-feet or proposal to pump the effluent into the injection well must be submitted to us for review and approval. Data on water quality and boring logs should be included with the submittal."

The letter from Bill's Crane Service, Inc. states:

"I would like to emphasize that the treated effluent from this proposed development will be of far higher quality than the untreated sewage flowing into the ground from a typical cesspool serving a single family residence. Therefore, concern should be focused on the existing cesspools in the area that pose a greater threat to the health and environment of the community."

The final design of the injection wells will be determined based on the results of soil borings. Additional information on the coastal water quality to establish baseline information would prove to be extremely costly and time-consuming. Given the size of the project and the higher level of sewage treatment provided (in comparison to the adjacent cesspools) such a study would appear to be impractical and unnecessary. Also, in 1976, Gordon Dugan, Ph.D., prepared a study of water quality impact on a proposed residential project in the Punaluu area. In regards to the affect of effluent on the receiving water, Dugan stated:

"The affect that the effluent from private sewage disposal systems will have on the receiving water, after passing through the soil zone, is nearly impossible to ascertain with a high degree of confidence, inasmuch as the following factors are not accurately known: the length and direction of the subsurface flow path; the type of substratum the effluent is flowing through and what effect it has on the constituent contained in the effluent; the dilution factor, both in the subsurface and the fronting ocean; and the dispersion patterns of coastal waters."

(Source: "Household Sewage Treatment and Disposal Considerations for the Punaluu Beach Cluster Development, Punaluu, Koolauloa, Oahu, Hawaii," prepared by Gordon L. Dugan, Ph.D., March 8, 1976.)

The Department of Land Utilization, letter of March 5, 1974 to George M. Koga and member of the then City Council, provided the following statement relating to the elevation of the STP. "The Department of Public Works' approval letter dated

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April 21, 1981
Page 3

November 5, 1973 states: "The drainage study by R. M. Towill Corporation has been reviewed and is acceptable. We concur with the report conclusion that filling of the proposed site will not measurably or adversely affect surrounding properties in the flood plain. The increase of flood elevation of less than 1/4 inch is considered to be insignificant..."

Regarding your questions of the effect on the STP in the tsunami zone and the viability of the injection wells within the flood and tsunami zones, it is noted that the grading plan calls for the elevation of the STP and injection wells above the flood hazard zone. The sewage treatment plant consultant indicates that should there be temporary inundation of the STP site and injection wells, no malfunctions are expected because of the design of the STP.

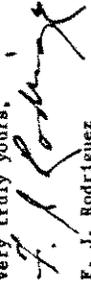
Comment:

Drainage: The EIS does not adequately address drainage. Section 5.5 (a) does not deal with the amount of storm runoff generated nor does it deal with the streams ability to handle this runoff in peak periods. The surrounding area is rural and outside of Pat's we do not know of an area where 2/3 of the surface area is paved therefore we would like to see further analysis of the composition, amount and method of handling drainage.

Response: The Drainage Study prepared by R. M. Towill and approved by the Department of Public Works, City and County of Honolulu, will be incorporated into the Final EIS. Also, portions of the Planning Commission Meeting's transcript (December 19, 1973) will be included to show the significant amount of discussion that occurred on the drainage plans.

Thank you for your comments, we appreciate your interest in this proposed project.

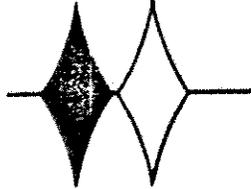
Very truly yours,


F. J. Rodriguez

Enclosures

cc: Environmental Quality Commission
Department of Land Utilization
Mr. Walter S. S. Zane
James K. Teugawa, AIA & Associates
Bill's Crane Service, Inc.

FJR:CKT:pi



Billi Crane Service, Inc.

PHONE 281-18
262-97

P. O. BOX 837
KANEIHE, HAWAII 96744

March 3, 1981

18 March 1981

Board of Water Supply
630 S. Beretania Street
Honolulu, Hawaii 96843

Attention: Mr. Gilbert Oki, Engineer

Dear Mr. Oki:

Please reinstall 3" compound meter service
#664-16895 on site 53-382 Kamehameha Highway, Punaluu,
Hawaii.

Please bill service charges to:

PUNALUU DEVELOPMENT COMPANY
c/o Walter Zane Realty, Inc.
1000 Bishop Street, Suite 806
Honolulu, Hawaii 96813

Enclosed is reinstallation fee of \$200.00.

Sincerely yours,

Walter Zane Realty, Inc.

WSSZ:jh
cc: Environmental Communications, Inc. ✓

F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, HI 96809

RE: Punaluu Shores

Dear Fred:

In response to item 2 of the Board of Water Supply letter dated 24 February 19
we answer:

Our proposed sewage treatment plant must meet the applicable effluent
requirements of Chapter 38 of the Public Health Regulations. Non-
compliance will result in revocation of the permit to operate said
plant.

Table 11 outlined in section 7.2A of the regulations allows the
installation of an injection well 50' from any stream, pond, lake
or the ocean.

I would like to emphasize that the treated effluent from this proposed
development will be of far higher quality than the untreated sewage
flowing into the ground from a typical cesspool serving a single family
residence. Therefore, concern should be focused on the existing cesspools
in the area that pose a greater threat to the health and environment of
the community.

Sincerely,
BILLIE CRANE SERVICE, INC.

Robert L. Achi, Sales Manager

RLA/slm

PUNALUU COMMUNITY ASSOCIATION
Post Office Box 239
Hauula, Hawaii 96717

April 2, 1981

Department of Land Utilization
City & County of Honolulu
ATTENTION: Environmental Affairs Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

RE: Punaluu Shores Draft EIS

Gentlemen:

We welcome the opportunity to review the Draft Environmental Impact Statement for the proposed Punaluu Shores Project. In general, we feel that the statement is lacking in a number of critical details, presents certain conclusions and assumptions without appropriate supportive data, and if supportive data are cited they are often misleading. In other words, we do not feel the statement adequately addresses the impact on the Punaluu area.

Enclosed are detailed comments on the Draft Environmental Impact Statement.

Sincerely,
PUNALUU COMMUNITY ASSOCIATION, INC.

Creighton U. Mattoon
Creighton U. Mattoon
President

CC: F. J. Rodriguez, Environmental Communications, Inc.

TO: Dept. of Land Utilization
Environmental Affairs Branch

FROM: Punaluu Community Association, Inc.

DATE: April 2, 1981

ENVIRONMENTAL IMPACT STATEMENT (Draft) FOR THE PROPOSED
PUNALUU SHORES PROJECT

PAGE 1

1. SUMMARY. Project Description; It should be emphasized that this is primarily a hotel rental project. Owners of these types of units use them personally only a few weeks out of each year. Owners seek central management of condos which are purchased for investment purposes. (Kuilima Estates - see Waikiki Realty Corp.; Fats at Punaluu - see Pats Enterprises).

PAGE 2

(3) Population: Neighborhood Board #28 figures set population of Punaluu (Kahana Bay to Sacred Falls Rd.) at under 1200 persons. The increase of 306 transient persons is 25% of the population, a major impact.

PAGE 3

2. PROJECT DESCRIPTION
paragraph 2 - The SMA Boundary Line includes the entire project (TMK 5 3 05; 2, 38).

2.1 Statement of Objectives. Benefit is shown for future occupants of site but no benefits are shown to existing community. A project of this type "seeking a quiet rural setting" is an obviously self defeating venture. This type of development will destroy the "quiet rural setting" it purports to seek.

2.2 Technical Characteristics. It is noted that more than half of the units will not have kitchens. Original plans included area for food service/restaurant. It appears food requirements should be acknowledged and addressed here. Original plans proposed 8 to 10 foot high walls around mauka and northern boundaries. More information is required to properly judge the impact these walls may have on the adjoining properties.

PAGE 4

2.4 Social Characteristics. The social differences between resident of this rural community and transient hotel users are as dissimilar and impacting as the proposed towering urban use structure is to the agricultural/rural setting. It is incredulous that it would be difficult to predict.

2.5 Environmental Characteristics.

(a) The area behind subject site includes former sugar cane lands as well as agriculture lots that have residences on them. Additionally, there are homes on residential land directly back of the site.

PAGE 5

2.6 Public Utilities & Facilities

(b) Sewer treatment plant. It should be noted that no public waste water treatment plant has been projected for this area. It should be noted that comments received from the Civil Defense Dept. recommended the waste water facility be placed 1,800 feet mauka of the proposed site (Report to DLU 1973).
(c) Drainage. The EIS has not properly addressed the problem of surface runoff. Past records will show grave flooding of Funaluu Valley Road, the project site and the surrounding area (DLAR MAP, FP-20 Flood Hazard Info., 11/73). Detailed plans should be available regarding direction of runoff flow. A clarification of the plan as stated on page 5 of your report is requested. How is it proposed that the waters directed to the culvert will discharge into Punaluu Stream? The culvert, when open discharges onto Punaluu Beach.

PAGE 6

(I) Highway. The project is on a curve in the highway with poor visibility. Accidents recorded at this area are numerous and a double no-pass line exists the full length of the site.

PAGE 7

3. THE AFFECTED ENVIRONMENT

A summary of DLU agency reports and public information meeting records should be included here. Such responses as follow should be noted: SOIL CONSERVATION DEPT.: "The water table underlies the property at near sea level (approximately 3 to 6 ft.). It appears that there could be seepage of effluent to the beach when the system is in continuous use, because of rapid permeability and proximity to the beach." BOARD OF WATER SUPPLY: "There are maps that show where the water should run but cannot give a positive guarantee. We are not sure whether the treatment and underground passage of effluent filters out all viruses." This can pose a threat to marine life and restrict public use of swimming and fishing at this most popular beach fronting the proposed project.

PAGE 12

5.1 Physical Impacts.

(a) More detailed information is required to assess the impact of the sewage treatment plant. It is proposed to be within 200 ft. of residences. Will elevation of site require retaining walls? Will sludge bed be offensive to nearby residences?
(b) It is expected that the residences on the Kahuku side and mauka of the proposed project will experience loss of sunlight on their properties as well as blockage of tradewinds from the proposed project.

PAGE 13

5.2 Economic Impacts. Of great concern is the projection of higher taxes that will affect the surrounding residential and agriculture properties, some whose owners are on fixed incomes. Increased "value" is addressed within the context of dollars. Present residents consider "value" in terms of life style which would be decreased by urban intrusions.

5.3 Social Characteristics. Projects which promote resort use cannot by their own nature blend into a rural-type atmosphere. Vacationers do not have a commitment to a community or to community needs. There is no time to develop "interaction", only time enough to "get the most out of their vacation dollars". There appears to be no contribution that these visitors can make directly to the community, only to those to whom they pay their rental fees.

Social Conflicts do exist but are presently at a minimum. It is important that this report should show the increase in police calls and actual numbers and types of crimes committed in the vicinity of the Pats Condo and the Hanohano Condo in Punaluu. Unless these figures are noted, in comparison to the surrounding community, the true picture of social impact on a rural community cannot be properly measured.

PAGE 14

5.4 Land Use Impacts

Should this project be allowed it will discourage future agriculture use of the surrounding lands. Where urban development occurs, such uses as pig farming, chicken raising, cattle grazing become a nuisance. Historically, urban use prevails. (Kullima Condos are in constant conflict with farmers using organic fertilizers which attract flies.)

5.5 Impact on Environmental Quality.

(a) Question: Where does effluent settle? (see comments to DLU from Soil Conservation Dept.) Question: How effective are injection wells in areas where the water table is so close to the surface? Original plans for this project defended the use of soakage pits to assure best control of effluent discharge. (see R.M. Towill Corp. revised design report, 1973) Apparently injection wells have a history of failure (research Pats and Hanohano for numbers of failures which include flooding of parking areas with effluent). This issue must be thoroughly addressed to assure CZM requirements are met. Is this the same SFP originally proposed? They do not appear the same (Exhibit 2) as those in the 1973 drawings.

A more detailed presentation of the drainage plan should be presented. It does not appear possible that the culvert under Kamehameha Hwy. can carry the storm runoff to Punaluu Stream.

(b) A rendering of the STP site and facility should be made available so judgement can be made regarding impact it will have on the surrounding area. If the site is to be raised by 10 feet, how much higher will the facility structure stand?

(c) Passing automobiles cannot be compared to automobiles starting up and moving within the confines of a single parking lot. Adjoining property owners can look forward to 636 starts and stops daily with accompanying exhaust and noises. This is considered a maximum impact to them. Odors from the STP have not been addressed as impacting on the air quality. (Ref. to Engineer's comments, Public Inf. Mtg., Zane Proj. 1974) Will the sludge drying bed cause offensive odors? "It depends on who smells it. Some may not find it offensive." The site proposed for the STP is in close proximity to residences north, west and south.

(d) The "normal" home and recreational noises in a rural/agriculture setting cannot be compared to the "normal" noises from a neighbor who has 636 cars starting and stopping in a day and 306 or more persons creating home and recreational noises. The impact of noise from this site will be of significant proportions.

Of significant annoyance to the existing life style will be that of artificial lights. The adjoining residential and nearby lots will have no relief from the lighting of the proposed project. Additional annoyance is the fact that privacy will be given up by the adjoining residences because of the open view the Condo will have over the lower buildings and private yards.

(e) Residents who now live mauka (low coastal plain) of the proposed site object to the blocking of their view by the proposed condo. This report does not accurately describe residences directly mauka of the site. Additionally, those residents located above Cane Haul Road object to their view planes being threatened by the proposed project. The site is in the center of a curve of Punaluu Bay and will interrupt the visual planes from the highway at Punaluu Beach Park and from the opposite end at Haleaha Road. From almost any point mauka to makai or makai to mauka the visual plane will be interrupted by this project.

5.7 Impact on Infrastructure & Support Services.

(b) It appears imperative that all permits for construction of sewage treatment plant and site drainage plans must be reviewed by responsible agencies to satisfy CZM requirements.

(g) Does the local fire department have proper equipment to control highrise fires?

PAGE 17

6. Any Probable Adverse Environmental Effects Which Cannot Be Avoided

(2) Increased traffic hazard created by slow-down and turning of 636 vehicular trips on a curve of poor visibility. The highway fronting the project is marked with double no-pass lines

(4) The view plane will be obstructed from mountain to shore, from shore to mountain, and from coastline to coastline.

(6) The project has been proposed by the community since 1972 (see public hearings, 1972 to present). Community wishes to preserve low line, rural/agriculture setting.

(7) Constant bombardment of urban noises at all hours as is normal for resorts but abnormal for a rural community.

(8) Loss of privacy by adjacent property owners to viewers from upper levels of the condo.

(9) Odors and noises from the STP. Odors from concentration of autos and other motored vehicles.

(10) Constant subjection to artificial lights from condos and recreation, parking areas at night.

(11) Blockage of tradewinds to adjoining property owners.

(12) Blockage of sunlight to adjoining property owners.

(13) Decrease in "value" of property as seen by residents who prefer the present life style.

(14) Increase in property taxes which is seen as a threat to those who are on fixed incomes in the area.

PAGE 18

7. Alternatives to the Proposed Action

In 1977 the Developer's permits were revoked. In 1978 the City Council rescinded its resolution regarding approval of this development. At that time the Developer, Mr. Walter Zane appeared before the Punaluu Community Association to share his thoughts on the project. He requested that the community think about supporting the purchase of his property for public use as he would not be considering the construction of another highrise. Ideas offered at that meeting included possible well planned, low rise cluster homes to meet needs for affordable housing in the area.

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

PAGE 19

April 21, 1981

8. (1) Land. A seven-story building for resort use will have a long-term commitment to urban use and a long term affect on the use of the surrounding lands. Agriculture uses are usually lost to pressures created by urban uses. These uses (resort vs. agriculture) are incompatible.

(4) Open Space value of the project site. Visual plane will be interrupted from all view points.

Mr. Creighton U. Mattoon, President
Punaluu Community Association
P.O. Box 239
Hauula, Hawaii 96717

Dear Mr. Mattoon,

SUBJECT: Draft Environmental Impact Statement for the Proposed
Punaluu Shores Project

We have received and reviewed your letter dated April 2, 1981, on the abovementioned Draft EIS. Below, on an item by item basis, we have responded to each of your comment.

Comment:

Page 1

1. SUMMARY. Project Description: It should be emphasized that this is primarily a hotel rental project. Owners of each type of units use them personally only a few weeks out of each year. Owners seek central management of condos which are purchased for investment purposes. (Kullima Estates - see Waikiki Realty Corp.; Pats at Punaluu - see Fats Enterprises).

Response: In response to this, the developer has indicated that the purchasers must comply with the present laws relating to their unit. There is little doubt that some owners will choose to "pool" their units for a hotel rental project. This is a legitimate use and will be noted in the Final EIS.

Comment:

Page 2

(3) Population: Neighborhood Board #28 figures set population of Punaluu (Kahana Bay to Sacred Falls Rd.) at under 1200 persons. The increase of 306 transient persons is 25% of the population, a major impact.

Response: Does this include the de facto population of visitors at Pats at Punaluu and Hanohano rental units? The increase of 306 individuals, when the de facto population is used is likely to be much less than 25 percent of the de facto population of Punaluu. In the case of the Draft EIS, the North Shore population was utilized because of the availability of official data from the U.S. Census Bureau.

Comment:

Page 2

2. PROJECT DESCRIPTION

paragraph 2 - The SMA Boundary Line includes the entire project (TRK 5 3 05; 2, 38).

Response: A check with the Department of Land Utilization's maps showing the SMA indicates that the site is entirely in the SMA. This information will be corrected in the Final EIS.

Comment:

2.1 Statement of Objectives. Benefit is shown for future occupants of site but no benefits are shown to existing community. A project of this type "seeking a quiet rural setting" is an obviously self defeating venture. This type of development will destroy the "quiet rural setting" it purports to seek.

Response: Benefits will accrue to the community in terms of additional sales to visitors. The addition of 306 visitors need not "destroy" the present rural setting. In many cases, the visitors will be sightseeing on other parts of the Island or may be resting in their hotel unit or along the beach. Subsequently, the activities of the visitors should not be conspicuous or deleterious to the existing community or environment.

Comment:

2.2 Technical Characteristics. It is noted that more than half of the units will not have kitchens. Original plans included area for food service/restaurant. It appears food requirements should be acknowledged and addressed here. Original plans proposed 8 to 10 foot high walls around mauka and northern boundaries. More information is required to properly judge the impact these walls may have on the adjoining properties.

Response: At this time no food service area or restaurant is proposed; depending on the demand a small food service area may be included for the residents and hotel guests. No walls are included in the present plans. Should walls be constructed, their height will be consistent with the Comprehensive Zoning Code (CZC).

Comment:

Page 4

2.4 Social Characteristics. The social differences between residents of this rural community and transient hotel users are

as dissimilar and impacting as the proposed towering urban use structure is to the agricultural/rural setting. It is inconceivable that it would be difficult to predict.

Response: Dissimilarity does not necessarily result in social conflicts. Social actions are based on how individuals and/or groups react to each other. Thus, it would take only one individual to create social conflict, and the action of one individual is not predictable. This is the reason why it was stated that social interaction between visitors and residents cannot be predicted.

Comment:

2.5 Environmental Characteristics.

(a) The area behind subject site includes former sugar cane lands as well as agriculture lots that have residences on them. Additionally, there are homes on residential land directly back of the site.

Response: Based on information from the developer and a site visit, no homes were found "directly back of the site". There are homes several hundred feet mauka of the site; however, these appear to be obscured by the dense vegetation between the site and the homes.

Comment:

Page 5

2.6 Public Utilities & Facilities

(b) Sewer treatment plant. It should be noted that no public waste water treatment plant has been projected for this area. It should be noted that comments received from the Civil Defense Dept. recommended the waste water facility be placed 1,800 feet mauka of the proposed site (Report to DLW 1973).

Response: The developer was aware that no immediate plans for a public wastewater treatment plant for the area existed. This, in fact, was one of the reasons why he is proposing the private STP. The Final EIS will note that no public wastewater treatment plant is proposed for the area. The Civil Defense Department recommendation was based on the impact of flooding on the proposed STP. Grading plans call for elevating the site of the proposed STP to prevent flooding. Additionally, the sewage treatment plant consultant has indicated to us that temporary inundation of the STP caused by tsunami or stormwater will not cause the STP to malfunction which was the concern of Civil Defense.

Comment:

(c) Drainage. The EIS has not properly addressed the problem of surface runoff. Past records will show grave flooding of Punaluu Valley Road, the project site and the surrounding area (DLNR MAP, FP-20 Flood Hazard Info., 11/73). Detailed plans should be available regarding direction of runoff flow. A clarification of the plan as stated on page 5 of your report is requested. How is it proposed that the waters directed to the culvert will discharge into Punaluu Stream? The culvert, when open discharges onto Punaluu Beach.

Response: The Drainage Study prepared by R. M. Towill Corp. will be included in the appendices of the Final EIS. This Study will provide the detailed information requested. Briefly, the Study states:

"The lot will be filled to elevation 9.5 feet for both the sewage treatment plant and the apartment area. The hotel building will have a first floor elevation of 10.0 feet. The site grading was designed to drain as much of the onsite storm runoff to the existing ditch along the southern boundary to reduce flooding that exists in the low-lying area to the west of the property. The existing ditch (south boundary) will be cleared and should aid in relieving the existing flooding in the low-lying area."

"The onsite drainage improvements being proposed are a grass swale to drain the western area of the site and a concrete channel section to drain the northeast part of the site."

"The proposed grading and drainage plan shown in Figure 3 is necessary to keep the apartment-hotel complex and sludge treatment plant from being inundated during large storms. By directing the storm water falling on the project property to the highway culvert and cleaning the existing ditch leading to the culvert, a beneficial, rather than detrimental, effect is anticipated for the surrounding low-lying area."

The final receiving waters for stormwater runoff will be the coastal area along Punaluu Beach.

Comment:

Page 6

(1) Highway. The project is on a curve in the highway with poor visibility. Accidents recorded at this area are numerous and a double no-pass line exists the full length of the site.

Response: The proposed hotel building is set back over 65 feet from the present highway; subsequently, the driver's visibility along the highway should not be affected. Accidents found in

this area are within the average found along the North Shore area. A double no-pass line should increase driver precaution and decrease accidents in this area.

Comment:

Page 7

3. THE AFFECTED ENVIRONMENT
A summary of DLU agency reports and public information meeting records should be included here. Such responses as follow should be noted: SOIL CONSERVATION DEPT.: "The water table underlies the property at near sea level (approximately 3 to 6 ft.). It appears that there could be seepage of effluent to the beach when the system is in continuous use, because of rapid permeability and proximity to the beach." BOARD OF WATER SUPPLY: "There are maps that show where the water should run but cannot give a positive guarantee. We are not sure whether the treatment and underground passage of effluent filters out all viruses." This can pose a threat to marine life and restrict public use of swimming and fishing at this most popular beach fronting the proposed project.

Response: Enclosed are letters from the Board of Water Supply (dated March 19, 1981) and Bill's Crane Service, Inc. (the consultant for the sewage treatment plant). The letter from the Board of Water Supply (BWS) states:

"The proposed sewage treatment and disposal system is not anticipated to affect existing potable groundwater resources if the effluent is discharged by gravity flow into an injection well that is less than 30-feet deep. The plans for any injection well deeper than 30-feet or proposal to pump the effluent into the injection well must be submitted to us for review and approval. Data on water quality and boring logs should be included with the submittal."

The letter from Bill's Crane Service, Inc. states:

"I would like to emphasize that the treated effluent from this proposed development will be of far higher quality than the untreated sewage flowing into the ground from a typical cesspool serving a single family residence. Therefore, concern should be focused on the existing cesspools in the area that pose a greater threat to the health and environment of the community."

The effluent from the proposed STP must be monitored and tested so that it attains the water quality established by Chapter 38, Public Health Regulations. If the effluent is tested and does not meet the standards set

by Chapter 38, the Department of Health will not issue a certificate to operate the STP.

Information on the coastal water quality to establish baseline information would prove to be extremely costly and time-consuming. Given the size of the project and the higher level of sewage treatment provided (in comparison to the adjacent cesspools) such a study would appear to be impractical and unnecessary. Also, in 1976, Gordon Dugan, Ph.D., prepared a study of water quality impact on a proposed residential project in the Punaluu area. In regards to the affect of effluent on the receiving water, Dugan stated:

"The effect that the effluent from private sewage disposal systems will have on the receiving water, after passing through the soil zone, is nearly impossible to ascertain with a high degree of confidence, inasmuch as the following factors are not accurately known: the length and direction of the subsurface flow path; the type of substratum the effluent is flowing through and what effect it has on the constituent contained in the effluent; the dilution factor, both in the subsurface and the fronting ocean; and the dispersion patterns of coastal waters."

(Source: "Household Sewage Treatment and Disposal Considerations for the Punaluu Beach Cluster Development, Punaluu, Koolauloa, Oahu, Hawaii," prepared by Gordon L. Dugan, Ph.D., March 8, 1976.)

Comment:

Page 12

5.1 Physical Impacts.

(a) More detailed information is required to assess the impact of the sewage treatment plant. It is proposed to be within 200 ft. of residences. Will elevation of site require retaining walls? Will sludge bed be offensive to nearby residences?

Response: There are no plans nor an anticipated need for retaining walls for the STP. In regards to a possible odor problem from the STP or sludge bed, this matter was taken up by the Planning Commission, December 19, 1973. A portion of the transcript of the meeting is quoted below, the speaker responding to the odor question is Dr. Nathan Burbank, of R. M. Towill Corporation:

"The STP for this particular installation is a design on the extended aeration plant; that is, the sewage is held in the tank for 24 hours in the presence of oxygen and activated sludge bacteria. The liquid portion is settled. The solids that remain are returned for re-aeration in the activated sludge plant.

As sewage is fed to such a plant, there always comes about an accumulation of biological organisms. This is part of the process. As they grow, they die and they must be removed from the process. They are removed in the aerobic digester. You notice in every case I mention this is aerobic, all in the presence of air and oxygen. The whole intention of this process is that it be as odor free as possible. In a true aerobic process, the odor certainly is not objectionable and often not noticeable.

The bacteria feed for this process is held in this aeration tank for aerated digestion for a period of about five days. It is during this period that much of the organic matter, and I won't say every bit of it, is converted to forms that are considered to be odorless..."

Comment:

(b) It is expected that the residences on the Kahuku side and mauka of the proposed project will experience loss of sunlight on their properties as well as blockage of tradewinds from the proposed project.

Response: The blockage of sunlight if it occurs at all, should occur only during mid-morning hours for a short period of time. The area is affected by land and sea circulation, that is, during the day the cool breeze from the ocean blows inland, cooling the land areas. Subsequently, the residences on the Kahuku side of the project would not be affected because the proposed building would not block the predominant breeze from the sea. Although some localized ground wind pattern may alter around the proposed building, no significant or adverse wind conditions are expected to be altered.

Comment:

Page 13

5.2 Economic Impacts.

Of great concern is the projection of higher taxes that will affect the surrounding residential and agriculture properties, some whose owners are on fixed incomes. Increased "value" is addressed within the context of dollars. Present residents consider "value" in terms of life style which would be decreased by urban intrusions.

Response: The increase in property taxes is predicated on proportion of taxes itself (to the value of the property), and the increase in the property value. The increase in the property's value depends on the zoning, use, structures, capital improvements, inflation rate, value of similar property in the existing area, adjacent property uses, etc. In other words, the increase in property value is based on a variety of factors one of which includes adjacent property use and value. Subsequently, it is highly probable that the value of the adjacent properties and the taxes on these properties will increase with or without the implementation of the proposed project.

Comment:

5.3 Social Characteristics. Projects which promote resort use cannot by their own nature blend into a rural-type atmosphere. Vacationers do not have a commitment to a community or to community needs. There is no time to develop "interaction", only time enough to "get the most out of their vacation dollars". There appears to be no contribution that these visitors can make directly to the community, only to those to whom they pay their rental fees.

Response: This is an opinion which will be acknowledged in the Final EIS.

Comment:

Social Conflicts do exist but are presently at a minimum. It is important that this report should show the increase in police calls and actual numbers and types of crimes committed in the vicinity of the Pat's Condo and the Hanohano Condo in Punaluu. Unless these figures are noted, in comparison to the surrounding community, the true picture of social impact on a rural community cannot be properly measured.

Response: We have requested this information from the Police Department. If this information is made available to us, it will be included in the Final EIS.

Comment:

Page 14

5.4 Land Use Impacts

Should this project be allowed it will discourage future agriculture use of the surrounding lands. Where urban development occurs, such uses as pig raising, chicken raising, cattle grazing become a nuisance. Historically, urban use prevails. (Kuilima Condos are in constant conflict with farmers using organic fertilizers which attract flies.)

Response: While there has been conflicts and nuisances caused by urban/residential and agricultural uses, if the zoning allows such uses, there must be reasonable acceptance to various nuisances caused by these different activities. Urban use normally prevails because of the population density created by urbanization.

Comment:

5.5 Impact on Environmental Quality.

(a) Question: Where does effluent settle? (see comments to DMU from Soil Conservation Dept.) Question: How effective are injection wells in areas where the water table is so close to the surface?

Original plans for this project defended the use of soakage pits to assure best control of effluent discharge. (see R. M. Towill Corp. revised design report, 1973) Apparently injection wells have a history of failure (research Pat's and Hanohano for numbers of failures which include flooding of parking areas with effluent). This issue must be thoroughly addressed to assure CZM requirements are met. Is this the same STP originally proposed? They do not appear the same (Exhibit 2) as those in the 1973 drawings.

A more detailed presentation of the drainage plan should be presented. It does not appear possible that the culvert under Kamehameha Hwy. can carry the storm runoff to Punaluu Stream.

Response: The questions raised on effluent injection wells, etc., were responded to earlier in this letter. The STP is the same as was proposed and approved in 1976. The Drainage Study will be appended to the Final EIS document. Information on drainage was previously provided. The Drainage Study and plans have been accepted and approved by the Department of Public Works, City and County of Honolulu.

Comment:

(b) A rendering of the STP site and facility should be made available so judgement can be made regarding impact it will have on the surrounding area. If the site is to be raised by 10 feet, how much higher will the facility structure stand?

Response: The STP will be a low-rise structure and should not be higher than one-story. This will be equivalent to the height of a single-family, single-story residential structure.

Comment:

(c) Passing automobiles cannot be compared to automobiles starting up and moving within the confines of a single parking lots. Adjoining property owners can look forward to 636 starts and stops daily with accompanying exhaust and noises. This is considered a maximum impact to them. Odors from the STP have not been addressed as impacting on the air quality. (Ref. to Engineer's comments, Public Inf. Mtg., Kane Proj. 1974) Will the sludge drying bed cause offensive odors? It depends on who smells it. Some may not find it offensive. The site proposed for the STP is in close proximity to residences north, west and south.

Response: The noise should be distributed throughout the day and should not result in a significant impact to nearby residences. Many adjacent residents would likely be at work when these automobiles leave and return to the hotel. Exhaust from these auto-

mobiles will be diluted in the air and should not create odors unless the exhaust system in the vehicles are malfunctioning. Odor from the STP and the sludge beds were addressed earlier.

Comment:

(d) The "normal" home and recreational noises in a rural/agriculture setting cannot be compared to the "normal" noises from a neighbor who has 636 cars starting and stopping in a day and 306 or more persons creating home and recreational noises. The impact of noise from this site will be of significant proportions.

Response: This is addressed above.

Comment:

Of significant annoyance to the existing life style will be that of artificial lights. The adjoining residential and nearby lots will have no relief from the lighting of the proposed project. Additional annoyance is the fact that privacy will be given up by the adjoining residences because of the open view the Condo will have over the lower buildings and private yards.

Response: The lights in the parking area and around the building will be placed so that only the immediate area below it is lighted. Further illumination would not only be costly but a waste of energy. The residents and visitors in the hotel will have a view of the yards and homes of the adjacent residences. This is not unlike other areas (urban and agricultural) on the island where because of structural or natural elevation there is a view of other residences.

Comment:

(e) Residents who now live mauka (low coastal plain) of the proposed site object to the blocking of their view by the proposed condo. This report does not accurately describe residences directly mauka of the site. Additionally, those residents located above Cane Haul Road object to their view planes being threatened by the proposed project. The site is in the center of a curve of Punaluu Bay and will interrupt the visual planes from the highway at Punaluu Beach Park and from the opposite end at Haleaha Road. From almost any point mauka to makai or makai to mauka the visual plane will be interrupted by this project.

Response: It is felt that the EIS accurately indicates the location and present views of residences mauka of the building. The EIS also states that the makai to mauka view will be altered. The Final EIS

will further state that the present makai views from residents living mauka of the site will include, after the building is constructed, a portion of the building. It should be noted that the hotel zoning for this land was established in 1966, prior to the construction of many of the single-family homes mauka of the site. Subsequently, there was available information which indicated the potential of having a high-rise hotel on the site.

Comment:

5.7 Impact on Infrastructure & Support Services.
(b) It appears imperative that all permits for construction of sewage treatment plant and site drainage plans must be reviewed by responsible agencies to satisfy CZM requirements.

Response: This is a standard procedure not only for the SMA requirements but to satisfy the regulatory requirements for each agency.

Comment:

(g) Does the local fire department have proper equipment to control high-rise fires?

Response: No. National concern over high-rise fires have initiated action to strengthen fire codes and safety practices in high-rise buildings. However, this is still in the study stage.

Comment:

Page 17

6. Any Probable Adverse Environmental Effects Which Cannot Be Avoided

(2) Increased traffic hazard created by slow-down and turning of 636 vehicular trips on a curve of poor visibility. The highway fronting the project is marked with double no-pass lines.

Response: These concerns were previously stated and responded to in this letter.

Comment:

(4) The view plane will be obstructed from mountain to shore, from shore to mountain, and from coastline to coastline.

Response: The extent to which the view plane is affected is stated in the Draft EIS.

Comment:

(12) Blockage of sunlight to adjoining property owners.

Response: This was addressed earlier.

Comment:

(13) Decrease in "value" of property as seen by residents who prefer the present life style.

Response: This was addressed earlier.

Comment:

(14) Increase in property taxes which is seen as a threat to those who are fixed incomes in the area.

Response: The matter of increases in property taxes was addressed previously in this letter.

Comment:

Page 18

7. Alternatives to the Proposed Action

In 1977 the Developer's permits were revoked. In 1978 the City Council rescinded its resolution regarding approval of this development. At that time the Developer, Mr. Walter Zane appeared before the Punaluu Community Association to share his thoughts on the project. He requested that the community think about supporting the purchase of his property for public use as he not be considering the construction of another highway. Ideas offered at that meeting included possible well planned, low rise cluster homes to meet needs for affordable housing in the area.

Response: The developer present plans are to pursue this project. At this time, the developer notes that over \$1 million has been spent on plans and studies on developing the proposed plan. Having spent this sum, he finds that he has "vested rights" in the property.

Comment:

Page 19

8. (1) Land. A seven-story building for resort use will have a long-term commitment to urban use and a long term affect on the use of the surrounding lands. Agriculture uses are usually lost to pressures created by urban uses. These uses (resort vs. agriculture) are incompatible.

Comment:

(6) The project has been proposed by the community since 1972 (see public hearings, 1972 to present). Community wishes to preserve low line, rural/agriculture setting.

Response: Opposition to the project from the community is noted in the Draft EIS.

Comment:

(7) Constant bombardment of urban noises at all hours as is normal for resorts but abnormal for a rural community.

Response: The noise from the hotel should not be "constant". Noise exceeding the Comprehensive Zoning Code and the State's noise regulations (Community Noise Control for Oahu, Chapter 44-8) is illegal. Thus, should there be loud or continuous noise exceeding these set standards, the appropriate agencies (Department of Health or the Police Department) should be contacted to cite violators.

Comment:

(8) Loss of privacy by adjacent property owners to viewers from upper levels of the condo.

Response: This has been responded to earlier in this letter.

Comment:

(9) Odors and noises from the STP. Odors from concentration of autos and other motored vehicles.

Response: This was responded to earlier in this letter.

Comment:

(10) Constant subjection to artificial lights from condos and recreation, parking areas at night.

Response: This was addressed earlier.

Comment:

(11) Blockage of tradewinds to adjoining property owners.

Response: This was addressed earlier.

Punaluu Community Association
April 21, 1981
Page 14

Response: This opinion will be noted in the Final EIS.

Comment:

(4) Open Space value of the project site. Visual plane will be interrupted from all view points.

Response: The impact on the view plane has been addressed in the EIS.

Thank you for providing a thorough review and analysis of the Draft EIS document. We hope that our responses as well as the additional information to be included in the Final EIS will provide your organization with the material needed to more fully evaluate the potential impacts of this project.

Very truly yours,


F. J. Rodriguez

Enclosures

cc: Department of Land Utilization
Environmental Quality Commission
James K. Tsugawa, AIA & Associates
Mr. Walter S. S. Zane

FJR:CWT:pl

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET
HONOLULU, HAWAII 96813-1001 (808) 521-4411



KILEEN R. ANDERSON
MAYOR

MICHAEL W. MCELROY
DIRECTOR
80/SMA-78(SM)

April 6, 1981

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Draft Environmental Impact Statement (EIS)
Punaluu Shores Project
Punaluu, Koolauloa, Oahu, Hawaii
Tax Map Keys: 5-3-05: 2, 38

We have reviewed the above and have the following comments to offer:

1. Reference: Page 1.
Comment: The project description of "a 7-story, 2-wing building having 102 units," is misleading. What is being proposed is a hotel structure and should be so stated.
 2. Reference: Page 3.
Comment: What was the total floor area of 80,844 square feet based on? The maximum floor area ratio for a zoning lot over 30,000 square feet is 1.4.
 3. Reference: Section 2.2(b) Technical Characteristics, Page 3.
Comment: The Draft EIS mentions that the 54 lodging units in Wing B will be double-loaded. We assume that if these units are double-loaded, they will be air-conditioned. If this assumption is correct, has any consideration been given to single-loaded corridors which would enhance the use of the prevailing tradewinds? If not, then has the use of a waste heat recovery system (i.e., industrial heat pump) been considered to recover wasted heat from the central air conditioning system and applied to heat water?
4. Reference: Page 4.
Comment: How was the requirement of 97 parking spaces derived? According to Section 21-7.7 of the Comprehensive Zoning code, at least 1.25 parking spaces per unit are required for hotel uses and dwelling units; and at least 0.75 space per unit are required for lodging units. The total required parking for this hotel would then be 101 rather than 97.
 5. Reference: Page 4.
Comment: A "single 22-foot wide ingress/egress to Kamehameha Highway" is discussed; however, two ingress/egress points are shown on Figure 2. Site Plan. Also, the one-site circulation is unclear and should be shown. Can a vehicle travel from one ingress/egress point to the other ingress/egress point on-site?
 6. Reference: Page 4.
Comment: It is stated that the selling cost of the units would be commensurate with similar housing in the area. What is the selling cost of commensurate housing?
 7. Reference: Page 11.
Comment: The proposed Development Plan for the Koolauloa District designates the project site for residential use. We are reviewing the Detailed Land Use Map (DLUM) designation with the Department of General Planning and may ask them to consider an amendment of the DLUM to what may be a more appropriate designation. Should the DLUM be amended, we intend to move toward a rezoning to the new designation.
 8. Reference: Page 11.
Comment: The statement "Several national and local cases of such a loss (e.g., down zoning) have resulted in fair monetary compensation to the owner/developer" should be supported with specific case citations, as well as a brief description of the circumstances regarding the particular case. The project is not subject to Chapter 343, HRS, provisions. The EIS is a requirement of Ordinance No. 4529, as amended.
 9. Reference: Page 14.
Comment: Why will storm runoff be discharged into Punaluu Stream, some 1,200 feet to the Kahana side of the project site, when there is a drainage swale (which is in much need of dredging and improvement) adjacent to the project site?

Mr. Fred J. Rodriguez
Page 2

ENVIRONMENTAL
COMMUNICATIONS
INC.

April 21, 1981

F. J. RODRIGUEZ,
PRESIDENT

Mr. Fred J. Rodriguez
Page 3

10. Reference: Page 15 and Appendix B.

Comment: It is felt that a view-plane study from the Kahuku side and the Kahana side of the project site along Kamehameha Highway, superimposed on photographs of those views is appropriate. Elevations of the building by itself do not show the visual environment in which it is proposed.

Also, the visual mass of the building is of concern, in relationship to its compatibility with its rural setting. Have other building alternatives been considered, e.g., breaking up the building into separate buildings? If so, these should be presented as alternatives to the proposed configuration, with justification as to why the current proposal was selected.

11. Reference: Appendix B, Elevations of the Proposed Punaluu Shores Building, Page A-7.

Comment: The elevation drawing labelled "East Elevation" shows the predominant material of the building's east face to be glass. As such, this will significantly add to interior room temperatures during the morning hours, and thus add to the air conditioning load for those units. The use of overhangs can cut this heat gain by as much as 90%.

12. Reference: Page 20.

Comment: Have the recreational facilities been reviewed and coordinated with the Department of Parks and Recreation? Will what is being proposed meet Park Dedication requirements?

We hope these comments are useful in the compilation of the final EIS. If there are any questions, please contact Sampson Mar of our staff at 523-4077.

Very truly yours,



MICHAEL M. McELROY
Director of Land Utilization

MMM:s1

cc: BGP

Mr. Michael M. McElroy, Director
Department of Land Utilization,
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. McElroy,

SUBJECT: Draft Environmental Impact Statement for the Proposed Punaluu Shores Project

We have received and reviewed your letter of April 6, 1981, on the above-mentioned Draft EIS. In response to your comments, we provided the following item by item discussion.

Item 1.

The "building" will be referred to as a "hotel," in the Final EIS.

Item 2.

The total floor area of 80,844 square feet is based on the H-1 zoned property of 57,746 square feet.

Item 3.

The double-loaded Wing B will not be air-conditioned. Adequate ventilation is expected from both the tradewinds and the land-sea breezes.

Item 4.

The information on page 4 was incorrect; a total of 101 parking spaces are required; 106 parking spaces will be provided. This information will be corrected in the Final EIS and included in the Site Plan.

Item 5.

There are two ingress/egress points. This will be corrected in the Final EIS. The configuration of the parking area is based on each ingress/egress serving about half the parking area. Subsequently, there would not be circulation between the two ingress/egress points.

Item 6.

Discussions with the developer indicate that at this time a price has not been set for the units. The developer's sales price will be determined after all the expenses are added, and will depend on the cost of comparable units on the market at the time of completion.

Item 7.

This information on the possibility of rezoning will be included in the Final EIS.

Item 8.

The immediate case that would be similar is the property in Mokuleia where the Council provided about \$350,000 for the downzoning of the property. Other cases (on a national level) will also be cited. In the case of the Mokuleia lands, the owners showed that they had "vested rights" in the apartment zoned property. It should be noted that the developer has expended \$1 million for plans and studies to implement the hotel project since his purchase of the property.

Item 9.

The project plans call for the use of a grass swale (to be improved by the developer) as well as the discharge of runoff into Punaluu Stream. This will be clarified in the Final EIS.

Item 10.

A study of the view plane based on photographs was discussed with the architectural consultant. The reasons for not including this visual aid include the expense and time involved and the belief that the visual would not differ from the impact as stated in the EIS; that is, the mauka-makai views will be altered due to the hotel's height and mass.

The architectural consultant has indicated that the proposed building was designed to be economical (in construction and maintenance), efficient, and the exterior design will be aesthetically pleasing.

Item 11.

The architect has indicated that the east elevation drawing may be misleading. Based on his experience as an architect, no unusual amounts of glass will be used for the proposed building.

Item 12.

At this time the developer intends to meet the Park Dedication requirements by providing some on-site recreational spaces and by contributing monies toward this requirement. Further details and agreements will be worked out with the Department of Parks and Recreation.

For your convenience we have included a copy of the letters indicating where corrections to the Final EIS were made based on the comments received. Thank you for your review and comments.

Very truly yours,


F. J. Rodriguez

Enclosures

cc: Environmental Quality Commission
James K. Tsugawa, AIA & Associates
Walter S. S. Zane

14. SUMMARY OF UNRESOLVED ISSUES

At this time, there are no known unresolved issues.

The inconsistency with the General Plan is noted in the text. This is not an unresolved issue because the project is consistent with the zoning of the parcel. The unresolved issue lies in the City's decision to place the zoning in line with the General Plan. This is a matter which would apply to other properties as well as this project site. Subsequently, it is not a "problem" which can be resolved by the proposed project.

Also, the local opposition to the project is an acknowledged condition. This is not an unresolved problem.

15. LIST OF NECESSARY APPROVALS

The following approvals and permits are required for the proposed project:

<u>Approval/Permit</u>	<u>Approving Agency</u>	<u>Status</u>
Environmental Impact Statement (Acceptance)	Department of Land Utilization	In Process
Special Management Area Permit (Ordinance 4529)	City Council	To be filed after EIS Acceptance
Conditional Use Permit (CUP)	Department of Land Utilization	To be filed SMA Permit
Grading Permit	Department of Public Works	To be filed after CUP
Filing of Sewage Treatment Plant Manual (Chapter 38)	Department of Health	To be filed after CUP
Building Permits	Building Department	To be filed after CUP

REFERENCES

1. Aotani and Hartwell Associates, Inc., Honolulu, Hawaii, State Comprehensive Outdoor Recreation Plan Technical Report, December, 1975.
2. Board of Water Supply, City and County of Honolulu, 2020 Plan, February, 1971.
3. Clark, John R. K., The Beaches of O'ahu, 1977.
4. Department of Anthropology, Department of Education, Bernice P. Bishop Museum, compiled by Elspeth P. Sterling and Catherine C. Summers, Sites of Oahu, 1978.
5. Department of Geology, University of Hawaii, Atlas of Hawaii, 1973.
6. Department of Land Utilization, City and County of Honolulu, "Report on Request for a Conditional Use Permit for Off-Street Parking Uses in Adjoining District in Punaluu, Tax Map Key 5-3-05:2 and 38 by W & C, Ltd.," dated February 26, 1975.
7. Department of Parks and Recreation, City and County of Honolulu, Index of Oahu's Parks and Facilities, 1975.
8. Dugan, Gordon L., Household Sewage Treatment and Disposal Considerations for Punaluu Beach Cluster Development, March, 1976.
9. Environmental Communications, Inc., Environmental Assessment for the Punaluu Beach Cluster Development, Punaluu, Koolauloa District, Oahu, April, 1976.
10. Geolabs-Hawaii, Geologic Reconnaissance Proposed Residential Development Punaluu, Koolauloa, Oahu, Hawaii, January 30, 1976.
11. Harding-Lawson Associates, Foundation Investigation Punaluu Shores Hotel Apartment Building, Punaluu, Oahu, Hawaii H-LA Job No. 5646,001.06, July 25, 1975.
12. Haselwood, E. L. and Motter, G. G., editors, Handbook of Hawaiian Weeds, June, 1976.
13. Merlin, Mark David, Hawaiian Coastal Plants and Scenic Shorelines, 1977.
14. Neal, Marie C., In Gardens of Hawaii, 1965.
15. Water Resources Research Center, University of Hawaii, Honolulu, Hawaii, Estuarine Pollution in the State of Hawaii, Volume I: Statewide Study, March, 1970.
16. Personal Communication, Department of Transportation, relating to traffic at Punaluu, July, 1980.

LIST OF EXHIBITS

<u>Exhibit</u>		<u>Page</u>
Exhibit 1	Description of the Sewage Treatment Plant	E-1
Exhibit 2	Letters Relating to Department of Health Approval of Sewage Treatment Plant	E-4
Exhibit 3	Letters Relating to Conceptual Approval of Driveway from Kamehameha Highway	E-10
Exhibit 4	Letters Relating to Drainage Plan Approval	E-12
Exhibit 5	Letter of March 5, 1974 from Department of Land Utilization to Members of the City Council	E-14
Exhibit 6	Portions of Transcript of Planning Commission Meetings of December 19, 1973 and January 9, 1974 relating to Drainage and the STP	E-18

DESCRIPTION OF THE SEWAGE TREATMENT PLANT
PUNALUU SHORES PROJECT

The sewage treatment system for the Punaluu Shores Project is based on the extended aeration method of sewage treatment. This type of process, the decomposition of sewage by bacteria and other microorganisms in the presence of oxygen or air, is one of the most efficient types of sewage treatment.

The extended aeration system makes use of biological processes to remove the organic matter from sewage. The process consists of intimately mixing influent with the activated sludge previously developed in the process, and aerating this mixture for 24 hours. This maintains bacteria and protozoa in contact with the organic matter in the waste in an aerobic environment.

The extended aeration system differs from other aerobic systems, that is, the operation periods are much greater (24 hours versus 8 hours or less). When the mass of activated sludge is mixed with the influent, most of the BOD₅ is adsorbed by the sludge and stored until it can be synthesized into additional biological forms. The adsorption time is quite short, 20 minutes to an hour. However, the synthesis of the adsorbed material into living organisms requires several hours and can only be carried out in the presence of a sufficient supply of dissolved oxygen. The rate of biological growth remains high until the organisms exhaust their food supply. With a decrease in food supply, the microorganisms enter the declining growth phase and the rate of growth is in proportion to the available food supply. Because of the extended detention, sufficient food is soon unavailable and the microorganisms pass from the declining growth phase to the endogenous growth phase and the bacteria must then draw upon their own food reserve to survive. Some self-destruction of organisms then takes place, resulting in a negative growth phase and therefore a minimum of sludge production.

The process design of the sewage treatment system encompasses the following: screening, sewage pumping, preliminary settling, extended aeration treatment, chlorination and disposal.

The sewage enters the lift station through an 8-inch pipe and falls through a bar screen basket which traps large undigestible solids. The sewage then flows through a bar screen gate which is a back-up system for the basket.

The sewage is then pumped by two submersible pumps to a trash and grease tank at an elevation that assures gravity flow through the remainder of the system. This tank provides a quiet zone with low velocities and adequate detention to allow settling of coarse and heavy solids. Also, grease and other floatable materials will be trapped at the tank surface. This process detains these materials until they break down into finer particles and again enter suspension or are removed from the tank during periodic maintenance.

The sewage then enters the aeration chamber and, near its point of entry, mixes with activated sludge. This aeration chamber is a horizontal, circular tank with air diffusion assemblies spaced evenly along the length of the tank near the bottom.

Each diffuser assembly injects air under pressure and at high velocities, in the form of millions of tiny bubbles, into the sewage. This accomplishes two things: it creates a spiral rolling action along the length of the tank which keeps solid material in suspension, and the large number of air bubbles allows maximum oxygen transfer, enabling microorganisms to survive and reproduce.

The organic materials present in the incoming sewage are broken down by the microorganisms, through digestion, and the obtained nutrients are used as their food supply. The food concentration decreases along the tank length, with the lowest concentration at the outlet end of the tank. This results in a minimum of excess sludge production by treatment facilities using the extended aeration system.

Following aeration, the aerated mixture flows into the clarifier which provides a quiescent zone with extremely low velocities so the activated sludge may separate from the aerated mixture. The sludge settles to the bottom of the clarifier, taking with it the organic matter and suspended solids present. Relatively clear and practically, though not completely, pure water flows over a vertical metal plate (weir) and out of the clarifier to the next stage of treatment.

The settled sludge or bacteria is then returned to the aeration tank by the air lift sludge return system to decompose more incoming sewage. This air lift system consists of a large diameter pipe extending from above the settling tank down to the cone-shaped bottom of the tank. An air lift type skimmer operated on the same principle (air is injected near the bottom of this pipe and as it rises sludge is drawn into the pipe and lifted to the top and into a horizontal pipe back to the beginning of the aeration tank) is installed in the clarifier so that floating solids can be removed and discharged back into the aeration tank.

The treated liquid (effluent) discharged from the clarifier then passes through chlorination facilities. This is done to kill the disease carrying (pathogenic) bacteria which might be in the effluent. The treated effluent passes into the chlorine contact tank where chlorine solution, pumped by the chlorinator pump from a solution tank, is allowed to mix with the effluent for a minimum of 15 minutes and then pass out of the tank to the disposal system which injects, by gravity, the effluent into a subterranean drainage layer.

Sludge aeration facilities are also provided. This consists of modification of the sludge return system to allow a portion of the activated sludge to be diverted to a sludge aeration tank. These facilities are used when the amount of sludge in the plant becomes so great that it cannot be efficiently settled out and returned to the aeration tank.

The treatment works must be operated and maintained in accordance with the requirements of an operation and maintenance manual approved by the Department of Health. For the permit to remain in effect, certain sub-surface disposal and effluent quality requirements must be met. Failure to meet these requirements can lead to the denial, suspension or revocation of the permit to operate.

The regulations clearly place the burden of operation and maintaining the system on the owner. The system has a standby power source, measures to control access and a certification by the owner that it shall be operated and maintained in accordance with all provisions of the maintenance manual. Soon a law will be enacted to require the certification of all operators of treatment plants. Thus the problems caused by lack of proper maintenance will become a thing of the past.

About the only other major cause for concern would be the failure of the discharge wells. There are two wells on the project and either one of them should handle the effluent disposal for a sufficient time to recover percolation in the clogged well and/or install a new one. Discharge of solids to the injection (discharge) wells should be negligible because of protection by weirs built into the system.

LETTERS RELATING TO DEPARTMENT OF HEALTH APPROVAL OF
SEWAGE TREATMENT PLANT - PUNALUU SHORES PROJECT

EXHIBIT 2

June 13, 1980

Mr. Harold Yee, Env. Engineer
STATE OF HAWAII
Department of Health
Pollution Technical Review Branch
645 Halekauwila Street, 3rd Floor
Honolulu, Hawaii 96813

Subject: "PUNALUU SHORES"
Wastewater Treatment Plant Approval
T.M.K.: 5-3-5: 38 & 2

Dear Mr. Yee:

This is an inquiry into the status of the subject project's wastewater treatment plant approval, which was given by your department in 1975. The developer of the project has advised us that he is finalizing all requirements and is ready to proceed. He is in the process of seeking a Special Management Area Permit as required by the Shoreline Protection Ordinance No. 4529.

There are: a) no changes in design flow, b) no changes in treatment unit size/models, c) no changes in treatment works locations, d) no changes in disposal methods or locations, e) no changes in building locations, f) no changes in the types of flow generation from the building, and g) no changes in engineer or owner of the development.

Are we correct in understanding that the prior approvals given still remain in effect? Please advise.

Sincerely,

JAMES K. TSUGAWA AIA & ASSOCIATES

James K. Tsugawa

JKT:so

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



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

July 1, 1980

GEORGE A. L. YUEN
DIRECTOR OF HEALTH

JOHN F. CHALMERS, M.D.
DEPUTY DIRECTOR OF HEALTH

JAMES S. KUMAGAI, PH.D., P.E.
DEPUTY DIRECTOR OF HEALTH

HENRY N. THOMPSON, M.A.
DEPUTY DIRECTOR OF HEALTH

TADAO BEPPU
DEPUTY DIRECTOR OF HEALTH

In reply, please refer to:
File: EPHSD-PTR

Mr. James Tsugawa
James K. Tsugawa AIA and Associates
Kawaihao Plaza, PH 609
567 S. King Street
Honolulu, HI 96813

Dear Mr. Tsugawa:

Subject: Punaluu Shores
Private Wastewater Treatment Works
TMK: 5-3-5: 38 and 2

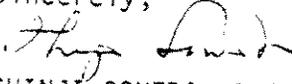
We have received your letter of June 13, 1980. A review of our files indicates that on November 28, 1975 the Department approved STP plans for the subject development in accordance with Section 3.B. of Chapter 38 in effect at that time. Your statement is correct that our previous plans approval is valid providing among other things that no changes have been made to the treatment works, the building it serves or owners and developers of the project.

On August 6, 1979, amendments to Chapter 38 became effective. One of the provisions of the amended regulations was that all treatment works must have a permit to operate. Because the project is considered an existing treatment works, a completed application for a permit to operate was to be submitted to the Department no later than February 6, 1980. Our records indicate that we have not received such an application. Therefore, please provide this office with the current address of the owner(s)/developer(s) such that an application form can be mailed to them.

Due to the time between the current date and approval of plans for the STP and the fact that our regulations have been significantly amended, we recommend that the owner/developer consider complying with the amended provision of Chapter 38.

Should you have any questions, please feel free to contact Harold Yee of the Pollution Technical Review Branch at telephone 548-6410.

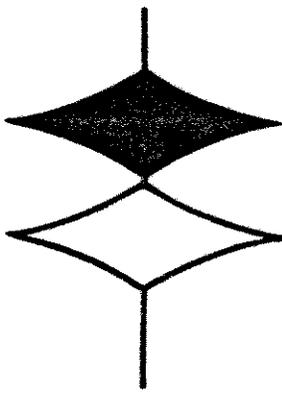
Sincerely,


SHINJI SONEDA, CHIEF
Environmental Protection and
Health Services Division

HKY/mt

cc: Ms. Lori Chee, DLU
Supervisor, NPDES Permit Section

E-5



Bill's Crane Service, Inc.

P. O. BOX 837
KANEIOHE, HAWAII 96744

PHONE 261-1938
262-9744

23 February 1981

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, HI 96809

RE: Environmental Impact Statement
Punaluu Shores

Dear Mr. Rodriguez:

We will address each item separately as denoted below:

- A. City and County of Honolulu letter dated 15 January 1981
 1. We concur.
 2. We concur.
 3. System proposed is a permanent facility.
 4. When necessary, a private pumping firm will be hired to handle the sludge and dispose of it at a City and County facility designated for this purpose and/or in a manner by which it is presently being accepted by the City and County for systems in the area.
 5. A certified operator will be employed to operate the facility.

- B. Your letter to Walter S. S. Zane dated 28 January 1981
 - (1) Sludge handling facility and effluent disposal plans - see #4 above. Our system, if operated and maintained properly, will produce effluent to meet the Department of Health requirements.

- C. State of Hawaii letter dated 23 January 1981
Conclusion - paragraph 2 - This does not apply to this project. See copy of letter from Dr. James S. Kumagai dated 8 August 1979.

Sincerely,
BILL'S CRANE SERVICE, INC.

Bob Hanna

for B. N. Hanna, President

BNH/slm

ZANE

February 12, 1981

State of Hawaii
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Attention: Mr. Melvin K. Koizumi
Deputy Director for
Environmental Health

Subject: Treatment plant for Punaluu
Shores project: (Communication
of January 23, 1981)

Dear Gentlemen:

Plans were forwarded to your department with an explanation that there were no changes to the approved building and development plans wherein a building permit was granted for said project on November 26, 1975.

Regarding the 12 months lapse factor (attached please note communication from Dr. James Kumagai, ph.D.)

Regarding permit operation application: the address and name of the owner is: Walter S. S. Zane, dba (W & C, Ltd.), address: 1000 Bishop Street, Suite 806, Honolulu, Hawaii 96813.

Sludge handling facility and effluent disposal plans.

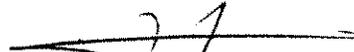
A private pumping firm will be contracted to de-sludge the system plus the disposal of said sludge.

Financial scheme to support the operation of the facility. This will be accomplished through the maintenance funds allocated by the Association of Apartment owners. (This project will be sold as a condominium).

State of Hawaii
Department of Health
Page -2-
February 12, 1981

I appreciate the opportunity to answer your concerns on said sewer plant.

Sincerely yours,



Walter S. S. Zane
Owner

WSSZ:jh
Enclosures



GEORGE R. ARIYOSHI
GOVERNOR (OF HAWAII)

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

GEORGE A. L. YUEN
DIRECTOR OF HEALTH

VERNE C. WAITE, M.D.
DEPUTY DIRECTOR OF HEALTH

HENRY N. THOMPSON, M.J.
DEPUTY DIRECTOR OF HEALTH

JAMES S. KUMAGAI, PH.D., P.E.
DEPUTY DIRECTOR OF HEALTH

TADAO BEPPU
DEPUTY DIRECTOR OF HEALTH

AUG 3

In reply, please refer to:
File: EPHSD-PTR

Mr. Bill Hanna
Bill's Crane Services, Inc.
P.O. Box 837
Kaneohe, HI 96744

Dear Mr. Hanna:

Subject: Chapter 38, Section 3.9

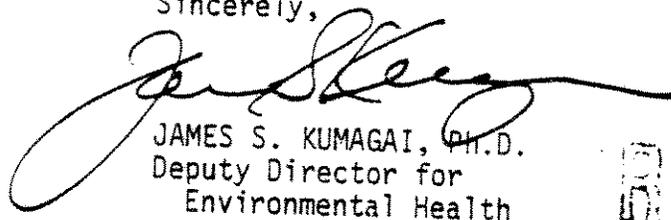
In response to your letter of July 27, 1979, it is our determination that Section 3.9 of the amended regulations will only be applicable to treatment works which are approved under the provisions to the amended regulations.

Treatment works plans and specifications that have been approved by the Department pursuant to Section 3.B. of the existing Chapter 38 will continue to be honored even though twelve (12) or more months elapse between the date of the plans and specifications and issuance of a county building permit. However, please be advised that any changes to the approved plans and specifications for a specific development needing Department approval received after August 6, 1979 will be subjected to the amended provisions of Chapter 38. Changes to approved plans and specifications that needs Department approval include but are not limited to (a) changes in design flow, (b) changes in treatment unit size/models, (c) changes in treatment works locations, (d) changes in disposal methods or locations, (e) changes in building locations, (f) changes in the types of flow generation from the building and (g) changes in engineers and owners of the development.

In addition to the above, please be informed that prior to operation of a treatment works, the owner must obtain a permit to operate pursuant to Section 7 of the amended regulations.

Should you have any questions, please call the Pollution Technical Review Branch.

Sincerely,


JAMES S. KUMAGAI, PH.D.
Deputy Director for
Environmental Health

RECEIVED

AUG 9 1979

HKY/mt
cc: Mr. Laurence Lau, DAG

RELATING TO HIGHWAY SYSTEM

GEORGE R. APYKOOHI
GOVERNORRYOKICHI HIGASHIONNA, P.M.D.
DIRECTOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU HAWAII 96813

DEPUTY DIRECTORS
JAMES R. CARRAS
JAMES B. MCCORMICK
DOUGLAS S. SAKAMOTO
JACK K. SUWA

IN REPLY REFER TO

HWY-CM
2.55749

February 26, 1980

Mr. James K. Tsugawa
James K. Tsugawa AIA & Associates
Kawaiahao Plaza
567 South King Street, Suite 310
Honolulu, Hawaii 96813

Dear Mr. Tsugawa:

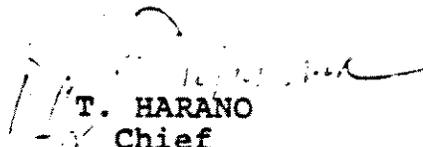
Punaluu Shores, TMK 5-3-05:38 & 2,
Kamehameha Highway, ID No. O-80-6

We are enclosing the plans received with your letter of February 5, 1980. The following are our comments and recommendation:

1. Insert the "Notes for Construction Within State Right-of-Way" on the plans;
2. Revise the driveway layouts and details as shown in red;
3. The approximate location of existing utility lines (shown in red) should be indicated on the plans;
4. The plans should include the information contained in Item IV of the enclosed "Procedure for Securing Approval of Permit Construction Plans" dated April 1, 1979;
5. Submit utility plans; and
6. Incorporate a traffic control plan within the plans.

Please submit two copies of the revised plans for our review and approval.

Very truly yours,


T. HARANO
Chief
Highways Division

Enclosures

GEORGE R. ARIYOSHI
GOVERNOR



RYOKICHI HIGASHIONNA, PH.D.
DIRECTOR

DEPUTY DIRECTORS
JAMES R. CARRAS
JAMES B. McCORMICK

JACK K. SUWA
JONATHAN K. SHIMADA, PH.D.

IN REPLY REFER TO

HWY-CM
2.56730

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

April 23, 1980

Mr. James K. Tsugawa
James K. Tsugawa AIA & Associates
Kawaiahao Plaza
567 South King Street, Suite 310
Honolulu, Hawaii 96813

Dear Mr. Tsugawa:

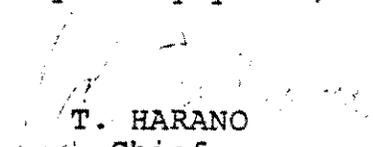
Punaluu Shores, TMK 5-3-05:38 & 2,
Kamehameha Highway, ID No. O-80-6

We are enclosing the plans received with your letter of
April 10, 1980.

The only comment we have is that the existing 4'x6' box
culvert (shown in red) should be indicated on the plans.

Please submit two copies of the detailed construction
plans, including the grading plans, for our review and approval,
when they become available.

Very truly yours,


T. HARANO
Chief
Highways Division

Enclosure

CITY AND COUNTY OF HONOLULU

LAHID11 4

RECEIVED

HONOLULU, HAWAII 96813

RELATING TO DRAINAGE PLAN APPROVAL

FRANK P. FASI
MAYOR

1973 NOV 7 PM 12 38



EDWARD Y. HIRATA
DIRECTOR AND CHIEF ENGINEER

KAZU HAYASHIDA
DEPUTY DIRECTOR AND
DEPUTY CHIEF ENGINEER

EC 73-1507

DEPT OF
LAND UTILIZATION
C & C HONOLULU

November 5, 1973

TO : MR. GEORGE MORIGUCHI, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM : EDWARD Y. HIRATA, DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF PUBLIC WORKS

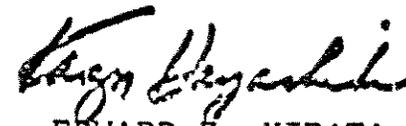
SUBJECT: CONDITIONAL USE PERMIT (72/CUP-21)
TAX MAP KEY: 5-3-05: 38
APPLICANT: W & C LTD.

This supplements our earlier comments of July 23, 1973 (EC 73-1022) on this CUP.

The drainage study by R. M. Towill Corporation has been reviewed and is acceptable.

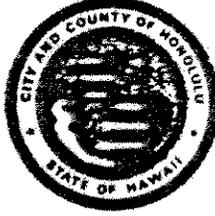
We concur with the report conclusion that filling of the proposed site will not measurably or adversely affect surrounding properties in the flood plain. The increase of flood elevation of less than 1/4 inch is considered to be insignificant.

Minor surface drainage problems resulting from the construction of the retaining wall along the Kahuku boundary can be evaluated and resolved with the final grading plan.

for 
EDWARD Y. HIRATA
Director and Chief Engineer

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK P. FASI
MAYOR

WALLACE MIYAHIRA
DIRECTOR AND CHIEF ENGINEER

001-14-0154

February 27, 1980

Mr. James K. Tsugawa
James K. Tsugawa AIA & Associates
Suite 310
567 South King Street
Honolulu, Hawaii 96813

RECEIVED
MAR 6 1980

JAMES K. TSUGAWA, AIA & ASSOC.

Dear Mr. Tsugawa:

Subject: Your Transmittal of February 5,
1980 Relating to Punaluu Shores
TMK: 5-3-05: 2 & 38

We have the following comments concerning the above proposed development located in a Special Management Area.

Drainage:

The proposed development is located in a Federal Insurance Administration Tsunami Hazard Area. Although we have no specific requirements, we recommend that you contact the FIA and the Building Department for any requirements they may have.

Refuse Collection:

Since private refuse collection will probably be used for this hotel development, we have no comment regarding refuse collection.

Sanitary:

Municipal sewers are not available.

Very truly yours,

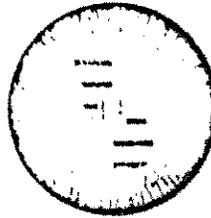
A handwritten signature in dark ink, appearing to read "W. Miyahira", is written over the typed name.

WALLACE MIYAHIRA
Director and Chief Engineer

629 POHUKAINA STREET
HONOLULU, HAWAII 96813

RANK F. FASI
MAYOR

PAUL DEVENS
MANAGING DIRECTOR



GEORGE S. MORIGUCHI
DIRECTOR

WILLIAM S. WANKET
DEPUTY DIRECTOR

HONOLULU, HAWAII

CITY CLERK

RECEIVED
MAR 21 8 AM 8 40
12/CUP-21 (RH)

March 5, 1974

Honorable George M. Koga, Chairman
and Members of the City Council
City and County of Honolulu
Honolulu, Hawaii

Gentlemen:

Punaluu Conditional Use Permit (D-79)
Applicant : W & C, Ltd.
Tax Map Key: 5-3-05: 38

This is in response to your letter of February 20, 1974, containing eight questions on the subject application for a Conditional Use Permit to construct and operate a private sewage treatment plant in Punaluu.

Question 1:

"Present in written form the Department of Health approval indicating the seepage pit as the primary and the injection well as the standby for the sewage treatment plant."

Answer:

Attached is a copy of the Department of Health's letter of June 25, 1973 granting approval in principle of proposed system as described in the applicant's revised design report dated June 1, 1973. Also attached are excerpts from that design report specifying the injection wells as back-up to the soakage trenches. This proposal was accepted by the Department of Health. Other proposals might also be accepted if proposed.

Question 2:

"Determine the ownership of the drainage ditch and the responsibility for its maintenance."

Dept. Com. No. 249

Referred to PZ (rept)

Rept _____ Res _____ Bill _____

Honorable George M. Koga, Chairman
and Members of the City Council

Page two

March 5, 1974

Answer:

Bishop Estate is the owner of the drainage ditch running along the southern boundary of the site. The ditch runs into the box culvert under Kamehameha Highway on the makai side of the site. This culvert is owned by the State and is under the jurisdiction of the Highways Division.

The drainage report submitted by W & C, Ltd. and approved by the City Department of Public Works states: "The existing ditch (south boundary) will be cleared and should aid in relieving the existing flooding in the low lying area." The applicant has indicated that he will clear the ditch and that Bishop Estate will not object.

Question 3:

"If the developer has the responsibility of maintenance of the ditch as noted in the report submitted, under what form of agreement will that be enforced?"

Answer:

This requirement will be covered as a condition of the Conditional Use Permit Resolution. Should the developer fail to keep his agreement to maintain the ditch he would be in violation of the Conditional Use Permit and the Council could then revoke his permit.

Question 4:

"Where does the drainage ditch begin and where does it end?"

Answer:

To the best of our knowledge, the ditch begins at Kamehameha Highway and runs mauka adjacent to the site along Green Valley Road. Just mauka of the site it levels out and blends in with Green Valley Road. On the southern-makai Kamehameha Highway corner of the site, the ditch runs into the box culvert going under Kamehameha Highway.

Attached is a map showing the approximate locations of the ditch, culvert, and swales.

Honorable George M. Koga, Chairman
and Members of the City Council
Page three
March 5, 1974

Question 5:

"As compared to the sewage treatment plant for Mokuleia, what is the difference in terms of efficiency and cost?"

Answer:

Both types of proposed plants have been certified by the State Department of Health as meeting their design and performance requirements. The applicant has been requested to provide comparative cost figures.

We are not qualified to comment on the relative efficiencies of the treatment plant proposals.

Question 6:

"At the time of the zoning application for the particular use in question, was the problem of drainage considered?"

Answer:

The Department of Public Works reviewed the proposed zone change from Highway Protective to Resort Hotel District on December 13, 1965. They did not comment on drainage problems at that time. At the Planning Commission's public hearing on January 13, 1966, the question of drainage was not discussed. The zone change ordinance was approved by Ordinance No. 2766 dated February 24, 1966.

Question 7:

"Does the site location of the sewage treatment plant and the runoff thereof have anything to do with the end result of the drainage system?"

Answer:

Apparently not. The Department of Public Works' approval letter dated November 5, 1973 states: "The drainage study by R. M. Towill Corporation has been reviewed and is acceptable. We concur with the report conclusion that filling of the proposed site will not measurably or adversely affect surrounding properties in the flood plain. The increase of flood elevation of less than 1/4 inch is considered to be insignificant." A copy of this letter is attached.

Honorable George M. Koga, Chairman
and Members of the City Council
Page four
March 5, 1974

Question 8:

"Is the proposed site within the temporary flood hazard district? If so, has the proper authority, Civil Defense Agency, been consulted with reference to the desirability of having this on site, or should it be somewhat mauka of the proposed site?"

Answer:

The maps of the Federal Insurance Administrator of the Department of Housing and Urban Development delineating the temporary flood hazard district clearly place this site within the flood hazard district (copy attached). The Oahu Civil Defense Agency does monitor this program. In answer to the above question, they stated: "It would be more desirable to have the sewage treatment plant located off-site and out of the flood hazard district." This would mean moving the sewage treatment plant somewhere further than 1,800 feet mauka. The Oahu Civil Defense Agency does not now have the authority to require such a move.

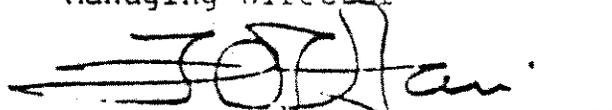
The City's obligation at this time calls for building permit review for drainage and flood control measures by the Department of Public Works. This has been completed and the applicant's proposals approved.

Respectfully,


GEORGE S. MORIGUCHI
Director of Land Utilization

FORWARDED:


PAUL DEVENS
Managing Director


FRANK F. FASI, Mayor
City and County of Honolulu

GSM:fm
Attach.

HONOLULU, HAWAII 96813

RECEIVED

IANK F. PASI
MAYOR

1973 NOV 7 PM 12 38

EDWARD Y. HIRATA
DIRECTOR AND CHIEF ENGINEERKAZU HAYASHIDA
DEPUTY DIRECTOR AND
DEPUTY CHIEF ENGINEER

EC 73-1507

PAUL DEVENS
MANAGING DIRECTORDEPT OF
LAND UTILIZATION
& C HONOLULU

November 5, 1973

TO : MR. GEORGE MORIGUCHI, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM : EDWARD Y. HIRATA, DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF PUBLIC WORKS

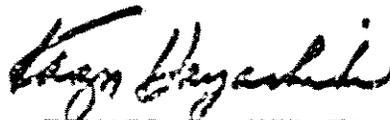
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Minor surface drainage problems resulting from the construction of the retaining wall along the Kahuku boundary can be evaluated and resolved with the final grading plan.

for 
EDWARD Y. HIRATA
Director and Chief Engineer

Honorable George M. Koga, Chairman
and Members of the City Council
Page two

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This requirement will be covered as a condition of the Conditional Use Permit Resolution. Should the developer fail to keep his agreement to maintain the ditch, he would be in violation of the Conditional Use Permit and the Council could then revoke his permit.

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Honorable George M. Koga, Chairman
and Members of the City Council
Page three

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Honorable George M. Koga, Chairman
and Members of the City Council
Page four

Question 8:

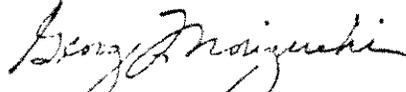
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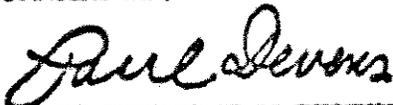
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Respectfully,



GEORGE S. MERIGUCHI
Director of Land Utilization

FORWARDED.



PAUL DEVENS
Managing Director



FRANK F. FAST, Mayor
City and County of Honolulu

GSM:fm
Attach.

Excerpts from Planning Commission Meeting - December 19, 1973
W & C, Ltd - 72/CUP-21 - Conditional Use Permit
Private STP for Proposed Hotel in Punaluu
Testimony of Mr. Allen Young, representing
R. M. Towill Corporation, Sanitary and
Civil Engineers for applicant.

2. Mr. Allen Young, representing R. M. Towill Corporation, Sanitary and Civil Engineers for applicant (No written testimony submitted)

YOUNG: Maybe I can clear a few things up.

Number 1, concerning drainage, we are not here to solve the drainage problem. There is a flooding area there of about 130 acres. There is no question, we can't solve that. We are proving that we will in no way worsen the condition. We are filling the property to protect all of our development. We're filling it one foot from the front portion of the lot, and the back roughly about five feet. So, it's not like we're filling it up 9½ feet. Our finished elevation is 9½ feet.

What we are doing, we're discharging whatever surface water falls on the roofs and parking, near the culvert so that when the culvert is cleaned and maintained, that will go out that way the quickest. But, the total drainage pattern is towards the back. It does not go towards the highway. It goes to a bridge about 800 feet down the highway. This is all brought about because of flooding from Punaluu Stream. We're not damaging anyone there. We're not solving the drainage problem, but we are protecting ourselves on this property.

Sewage requirements, we've gone over and over. The way it stands right now, we have one of the best fail-safe private systems anywhere planned right now. The treatment plant itself is designed to work in a dual system where if any equipment breaks down, you can go in and repair the other half without stopping all operations.

We also work it where we come into an incoming tank which stabilizes the system so that we cannot overload the treatment plant. We found that in some of the other developments like in Ewa, large surges would come in and the plant would upset and couldn't handle it. We have a system of stabilizing so that a flow will

continually go through the treatment plant at a steady pace. It will never overload, rise or lower.

We have almost tertiary equipment. We go into a filter, chlorinating the effluent so that we won't harm anyone around here. We're initiating our own tertiary equipment to make sure that those soakage pits don't clog up as we've noticed in other private developments. Those soakage pits were recommended by the Sewers Division and Health people. They wanted it fail-safe. We've gone along with this extra cost and come up with trenches of 200 to 250 feet long, plus two additional injection wells for standby in case the trenches don't work.

The sand beds were also recommendation of the sewage people because they felt that something definite had to be done with the sludge. They don't want to be in the position where some tank truck can't come along and pick up the sludge and take it away and everyone will complain in the area. No one else in any private plant is required to put one of these in.

I must say that Mr. Zane has really gone out of his way to try to satisfy everyone of these people. He's expending an extremely large amount of money to try to make sure that this development is well done. It's a hotel, not just a condominium where someone comes in and buys up all the units and he's out of it.

Questions were raised by the Commission.

DUKE: Approximately what is the cost of this system?

YOUNG: About \$200,000. If we did the type that some other private developments have done, we would only be in the range of about less than half of that.

The amount of sewage coming out of this plant is very, very small.

WAY: The requirement for the sludge-drying bed, where did that originate?

YOUNG: From both the Division of Sewers and the Health people.

WAY: How do you propose to dispose of the drying sludge?

ZANE: We would truck it away. We have a property of about 20,000 square feet and an acre which is about a mile away. It's all low land. As far as the sludge is concerned, I have been informed by the engineer that there's no stench.

We have to realize that our application is for a CUP. If we adhered to that, we will be less confused with all the testimony brought out by the objectors.

WAY: In connection with the disposal of the sludge, are you aware of any requirements by public agency covering the method of such disposal?

YOUNG: Yes, we've gone through Chapter 38 of the Health requirements. We've gone through every single item with the Health Department.

WAY: Possibly another one which you may or may not have had an opportunity to consider, but should be, and that is that having to do with either the grading ordinance or depending upon the locale, a CUP for the disposal of sludge on the other site. I would suggest strongly that you look into that aspect.

The other aspect has to do with odor. Are you prepared to explore that issue for us a bit? What's the problem? Is there a problem? Is it a problem having to do with the beds themselves? Is it another source? What, if any, measures are there incorporated in the design that attempt to alleviate that problem?

(At this point, Dr. Nathan Burbank, Director of Environmental Research for R. M. Towill Corporation, was called upon to respond to Mr. Way's questions.)

BURBANK: As Director of Research, I have reviewed three separate plans for this particular installation. Each one was prepared in accordance with the existing requirements at the time, and would have met the requirements. Each was reviewed by the State Health Department and the Department of Public Works. There were comments to us each time strengthening the design of the plant, in short, to make it as fine a plant that could be designed for this particular purpose.

The STP for this particular installation is a design on the extended aeration plant; that is, the sewage is held in the tank for 24 hours in the presence of oxygen and activated sludge bacteria. The liquid portion is settled. The solids that remain are returned for re-aeration in the activated sludge plant.

As sewage is fed to such a plant, there always comes about an accumulation of biological organisms. This is part of the process. As they grow, they die and they must be removed from the process. They are removed in the settling basin and conveyed to a second aeration chamber, the aerobic digester. You notice in every case I mention this is aerobic, all in the presence of air and oxygen. The whole intention of this process is that it be as odor free as possible. In a true aerobic process, the odor certainly is not objectionable and often not noticeable.

The bacteria freed from this process is held in this aeration tank for aerated digestion for a period of about five days. It is during this period that much of the organic matter, and I won't say every bit of it, is converted to forms that are considered to be odorless. It is this material from the aerated aerobic digestion chamber that is requested to be removed to

Testimony of Mr. Hiroshi Miyake, Department of Public Works

Planning Commission Meeting January 9, 1974
W & C, Ltd - 72/CUP-21 Conditional Use Permit
Private STP for Proposed Hotel in Punaluu

UNFINISHED BUSINESS
CONDITIONAL USE PERMIT
(PRIVATE STP)
PUNALUU
W & C, LTD.
(FILE #72/CUP-21)

The public hearing held December 19, 1973 was closed and action deferred for representatives from the State Department of Health and the City and County Department of Public Works to comment on the effects of drainage and flooding upon the proposed sewage treatment plant.

Mr. Hiroshi Miyake from the Drainage Section of the Department of Public Works was questioned by the Commission.

CHAIRMAN: Did you have an opportunity to review the letter of Kathleen Mattoon, dated December 19th?

DUKE: Yes.

CHAIRMAN: Several questions were raised in there regarding drainage of some of the flood problems. Do you have any comments for the Commission on that?

MIYAKE: I believe, the engineering firm referred to material which right now is not available publicly. We have checked into it and found that it's a draft form. We have a copy of it here. They will be publishing this in the future.

CHAIRMAN: What does this material cover?

MIYAKE: The possible flood zone in that area.

On this six by four culvert, it's under State jurisdiction. The ditches along side that enter into it are all privately owned. These ditches will not be maintained by the City, and also the culvert. However, the engineering firm recognized this and they have promised us to make strong attempts to get the State to clean the culvert.

Their drainage study was studied, and the activity in that area will result in the clearing of their land to take up the development from flooding so the effect upon the land will be insignificant. It does not aggravate what is already existing there. So on that basis, we have accepted their drainage report.

DUKE: Did you have an opportunity to visit that area this past weekend?

MIYAKE: No, I'm taking the place of my superior who's on leave at the present time.

DUKE: Well, the problem in my mind right now is whether to give this CUP for the sewage treatment plant, not really to control all the floods back there, no. I believe that floods really have some bearing on the operation of this particular system which has an open drying bed. What do you think might have happened this past weekend?

MIYAKE: They will be raising that land much higher than what is presently there now, an elevation of 10 to insure that the flood beds will not be inundated.

DUKE: How high will it be above the highway?

MIYAKE: About three feet higher.

DUKE: With the weather we had this past weekend, what effect do you think that rainfall would have on the open drying bed?

MIYAKE: I wonder if Sewers could comment on that. We do not deal with the flood bed. We have no experience on it.

DUKE: I might add, would it under any condition contaminate the ground water or would it create obnoxious odors?

MIYAKE: That I cannot answer.

HARRIS: We have representatives from the Health Department and the Sewers Division. Mr. Miyake is strictly drainage.

DUKE: Well, they sure had some drainage problems out there this weekend. I know this is unusual but it does happen.

SULLAM: The Soil Conservation Service said they are fearful of seepage of the effluent into the beach, that is if the system is in continuous use. Where did the Soil Conservation Service obtain their information?

MIYAKE: Yes, you are correct. The lowland will be inundated. Those lands will be cleared. If they are permitted to build this STP, they will fill this area.

SULLAM: You feel the buildup will take care of the problem?

MIYAKE: Yes, so that it won't be inundated.

CHAIRMAN: Is it your feeling that with the buildup of the land in this area that there will not be the possibility of polluting the beaches?

MIYAKE: I have to say again, if you have heavy rainfall and whether that heavy rainfall will pollute the beaches, that question I cannot answer. I'm not an authority on sewage. But, if they raise the land, that land will not be inundated.

At this point, Mr. Albert Imamura from the Division of Sewers was questioned by the Commission.

CHAIRMAN: Have you had an opportunity to go over some of the questions which were raised regarding this proposed sewage treatment plant.

IMAMURA: I believe you're concerned with that large drying bed.

CHAIRMAN: And the effect of highwater on that drying bed.

IMAMURA: Not in that sense. We only get involved as far as the function of the treatment process itself.

CRANE: There seems to be concern of drainage and heavy flooding during heavy rains, and if this would indeed pollute the beaches. Are you prepared to answer that? He couldn't answer it because he's an expert on drainage. Can you answer it?

IMAMURA: No I can't either because--

CRANE: Could you tell me who could because I don't know who to ask.

EXHIBIT 7

Information relating to cases in downzoning.

The information attached relates to three cases in downzoning. The information are summaries which have recently appeared in the publication: Land Use Law & Zoning Digest from 1978 to 1979. These are examples only limited time precluded the citation of additional detailed information and cases.

Two zoning cases were consolidated for trial, one concerning rezoning and the other concerning vested rights. In the rezoning case the trial court voided the rezoning, and in the vested rights case the court directed the city to continue processing the building permit application. The state supreme court affirmed the trial court opinion. In 1967 the city adopted a comprehensive plan and a new zoning ordinance. In 1969 the property at issue was rezoned from single-family residential to a classification permitting apartment construction. Plaintiff's subsequent petition to have the subject lots rezoned for high-rise was denied. After a city order to bring his buildings up to code standard or demolish them, the plaintiff applied for a demolition permit. In

30 ZD 360-361

1974 residents filed a petition to rezone the lots back to single-family use. Then the plaintiff applied for a building permit to construct an apartment building on the lot and discontinued its efforts to obtain a demolition permit. Then the City Council voted to rezone the land to single-family use. At the Building Department's request, the developer submitted an environmental assessment; however, for a variety of reasons, the superintendent of buildings refused to continue to process the permit application. In 1975 the developer sought to compel the superintendent to proceed with the processing of the application, and, thus, the vested rights case was commenced.

The court held that the decision to rezone the property was unsupported by credible evidence and was, therefore, arbitrary and capricious. Based on case precedent, the court noted that: (1) there was no presumption of validity favoring the action of rezoning; (2) the proponents of the rezoning have the burden of proof in demonstrating that conditions have substantially changed since the original zoning; and (3) the rezoning must bear a substantial relationship to the public health, safety, morals, or welfare. Proof of a changed attitude in the neighborhood indicating support for rezoning to single family should be given substantial weight; however, it should not be controlling. The court also held that the developer had a vested right because he had diligently made an application for a building permit, and his efforts were frustrated by the city.

Parkridge v. City of Seattle, Supreme Court of Washington [highest court], Decided January 5, 1978, 573 P.2d 359

31 ZD 339

REZONING

ARIZONA

The plaintiff sought either a declaratory judgment that the city's downzoning of his property from industrial to residential was invalid or damages because the rezoning rendered his property useless and was therefore a taking of his property without compensation. The plaintiff owned a 10' by 60' lot on which he wished to erect a sign advertising his gas station.

The court invalidated the rezoning because it had no substantial relation to the health, safety, morals, or general welfare of the public. The city had already protected the surrounding residential land through setback requirements and limits on illumination of signs located on abutting industrial property. The court also found that the city's action constituted a taking since the property had no value after the rezoning, even though the lot could be used for residential purposes in conjunction with surrounding land. The court found that this was an excessive restriction on the use of the property because the landowner's only choices after the rezoning would be to sell his land or buy the adjacent land. That would put him in a position where the surrounding landowners could either pay him very little for his land or charge him excessive prices for their land.

Cardon Oil Co. v. City of Phoenix, Supreme Court of Arizona [highest court], Decided March 28, 1979, 593 P.2d 656

31 ZD 492

ZONING ORDINANCES

GEORGIA

A property owner sought a rezoning of his property which was zoned single family residential. The court denied his request three times. Subsequently, he filed suit, and the lower court ordered the county to rezone the property. The county did so, changing it to a low density, single-family zone. The lower court then enjoined the county from any future attempt to enforce any zoning on the property. The property was bounded on one side by single-family residences and on the other side by commercial uses. The court first considered whether the county's rezoning was unconstitutional. It held that it was because the plaintiff had shown that his land could not be developed under the present zoning classification and the county had failed to show that the zoning bore substantial relation to public health, safety, morality, or general welfare. The court also stated that, since the neighboring residential property owners, who were innocent parties, would be likely to suffer, the county would be given one more chance within a reasonable time to zone the land constitutionally.

DeKalb County v. Flynn, Supreme Court of Georgia [highest court], Decided May 30, 1979, 256 S.E.2d 862

APPENDIX A

SOCIOECONOMIC PROFILE OF CENSUS TRACT 102
(Hauula, Punaluu, Kaaawa, Malaekahana, Laie)
1975 Census Update Survey

1975 CENSUS UPDATE - SOCIOECONOMIC PROFILE FOR CENSUS TRACT 102

Census Tract 102 consists of the area which covers Hauula, Punaluu, Kaaawa, Malaekahana, and Laie. The objective of providing this information is to identify (with the latest data available) the socioeconomic characteristics of the surrounding area. The impact of new people in this community of approximately 8,000 (1980 estimate) cannot be accurately predicted. However, it would be anticipated that approximately 306 people will be generated by the Punaluu Shores project. This would represent about 4.0 percent of the present population in this area. The occupants, based on the income level of mortgage qualifiers, would likely be older couples and families which would utilize their unit for a second or vacation-type residence. Other units will be lodging units available for short-term visitors. Whenever a development such as this is located in a rural-type community, there is likely to be some opposition to this use (i.e. hotel). However, socioeconomic reports and papers, suggest that many visitors (short- and long-term) select this type of environment (e.g. secluded, rural) to "get away" from the more intense urban environment. As such, most of the visitors advocate retaining the rural atmosphere and find that further urbanization is undesirable. The local people reaction to such visitors vary; however, the short period in which most of them remain in the community or the infrequency of the stay (for second home type residents) appear to result in lesser conflicts versus permanent residents. Because of the short-term or periodic residency of these visitors, the community is expected to remain the much the same even with the implementation of this project.

Summary of Socioeconomic Profile for Census Tract 102. The total 1975 population of Census Tract 102 was 7,122 or 1.05 percent of Oahu's population. The population of CT 102 is younger than the rest of Oahu. The population consists of a higher percentage of Part-Hawaiian, and less people of Chinese and Japanese extraction. The household size for CT 102 is larger, 4.0 persons per household versus 3.43 persons per household for Oahu. Although CT 102 has a higher percentage (90.0) of permanent residents (versus Oahu's total of 85.2 percent), it has a lesser percentage of U.S. citizens (87.0 versus 92.8 for Oahu). Residency data (living at the same residence for one and five years) show that the population of CT 102 is more mobile than the total population of Oahu. Education levels attained are approximately the same for all Oahu.

In the area of income, CT 102 in 1975 had a lower personal income than all Oahu (\$6,600 versus \$7,470); the median household income for the population of CT 102 is considerably lower (\$12,300 versus \$16,273 for Oahu). CT 102 also has a higher percentage of households below poverty level (13.3 percent for CT 102 versus 10.0 percent for all Oahu). Related to income, is the employment data which reflects the higher percentage of unemployed persons in CT 102 (5.4 percent) versus Oahu's 4.4 percent. Also of interest is that employment in the service industry (which includes hotels) is significantly higher (41.7 percent) than Oahu's percentage of 20.8. Finally, it is noted that CT 102 has a slightly higher percentage of renters than all of Oahu.

SOCIO-ECONOMIC DATA FROM 1975 CENSUS UPDATE SURVEY

CENSUS TRACT 102

	<u>No.</u>	<u>%</u>
TOTAL NUMBER OF PERSONS	7,122	100.0
MALE	3,549	50.0
FEMALE	3,573	50.0
AGE DISTRIBUTION		
UNDER 5 YEARS	1,073	15.0
5-19 YEARS	2,152	30.0
20-29 YEARS	1,567	22.0
30-64 YEARS	1,971	28.0
65 YEARS +	329	5.0
ETHNICITY		
BLACK	25	.35
CAUCASIAN, NOT PORTUGUESE	1,861	26.0
CAUCASIAN, PORTUGUESE	40	.56
CHINESE	237	3.3
FILIPINO	59	.82
HAWAIIAN	114	1.6
PART-HAWAIIAN	2,622	37.0
JAPANESE	263	3.7
KOREAN	13	.18
PUERTO RICAN	49	.68
SAMOAN	861	12.0
MIXED	400	5.6
OTHER	462	6.5
MARITAL STATUS OF POPULATION (OVER 14)		
NOW MARRIED	4,240	60.0
WIDOWED	351	4.9
DIVORCED	288	4.0
SEPARATED	35	.49
NEVER MARRIED	2,091	29.3
REFUSED/DON'T KNOW	16	.22
NUMBER IN HOUSEHOLD		
1	110	1.5
2	626	8.8
3-4	2,635	37.0
5-7	1,955	27.4
7-8	1,329	18.7
9-10	463	6.5
11 OR MORE	0	0.0
ESTIMATED AVERAGE PERSON HOUSEHOLD	4.0	

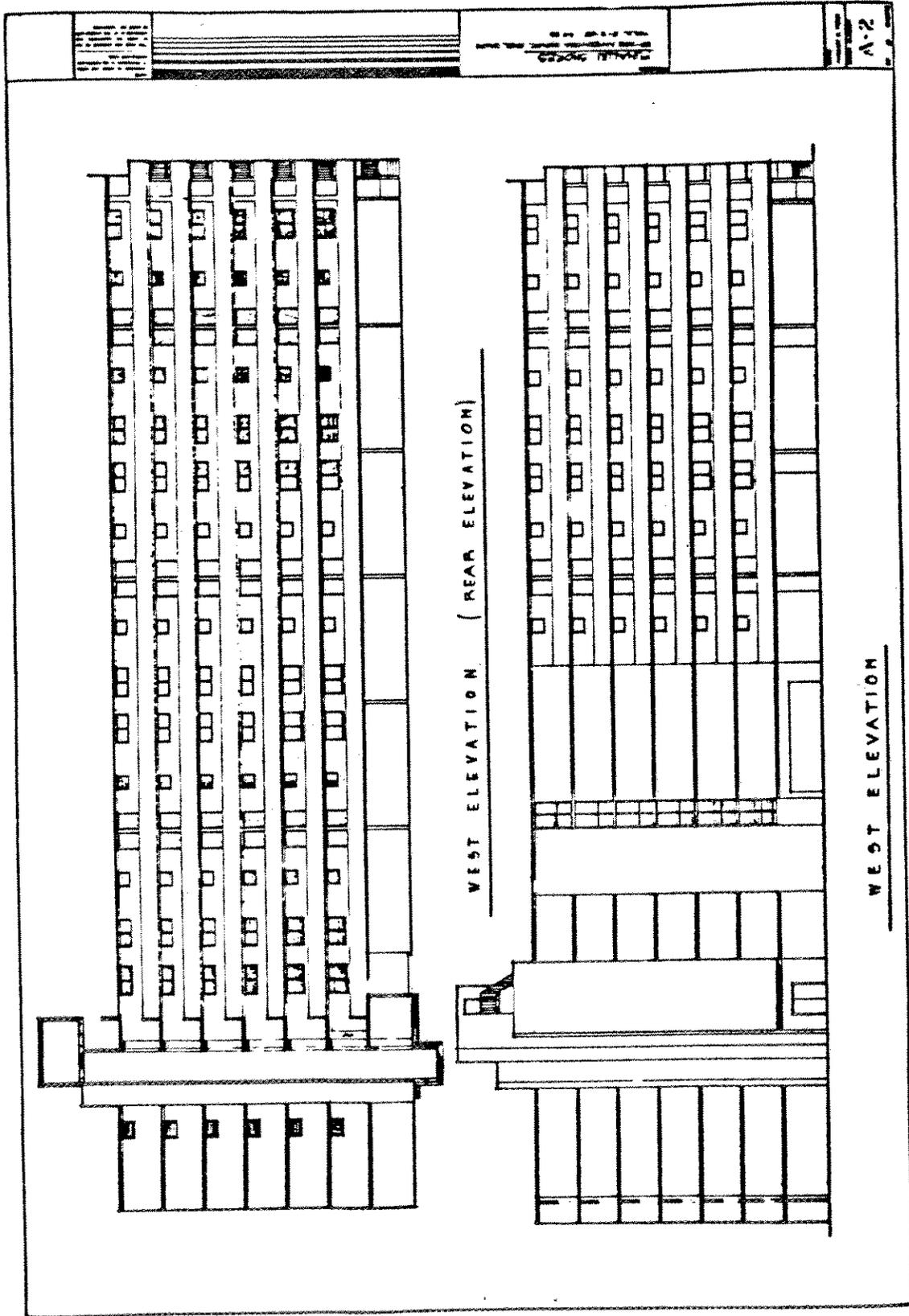
	<u>No.</u>	<u>%</u>
RELATIONSHIP TO HEAD OF HOUSEHOLD		
HOUSEHOLD HEAD, SPOUSE OF HEAD		
SON OR DAUGHTER	6,188	86.9
GRANDCHILD, PARENT, SON/DAUGHTER-IN-LAW, BROTHER/SISTER, OTHER RELATIVE	458	6.4
UNRELATED	480	6.7
PERMANENT RESIDENTS AS PERCENT OF TOTAL	6,407	90.0
PLACE OF BIRTH		
OAHU	3,647	51.0
ELSEWHERE IN STATE	333	4.7
OTHER U.S. STATE	1,638	23.0
U.S. POSSESSION OR TERRITORY	388	5.4
OTHER COUNTRY	1,069	15.0
CITIZENSHIP		
U.S. CITIZEN	6,174	87.0
U.S. NATIONAL	63	.88
CITIZEN OF OTHER COUNTRY	887	12.0
LIFETIME RESIDENCY		
OAHU	3,289	46.0
STATE	3,649	51.0
RESIDENCY ONE YEAR AGO		
SAME HOUSE	4,276	60.0
OTHER HOUSE ON OAHU	1,381	19.0
OTHER ISLAND	46	.64
OTHER U.S. STATE	588	8.2
U.S. POSSESSION OR TERRITORY	0	0.0
NOT APPLICABLE/REFUSED/DIDN'T KNOW	464	6.5
OTHER COUNTRY	369	5.2
RESIDENCY FIVE YEARS AGO		
SAME HOUSE	2,538	36.0
OTHER HOUSE ON OAHU	2,854	40.0
OTHER ISLAND	92	1.3
OTHER U.S. STATE	916	13.0
U.S. POSSESSION OR TERRITORY	43	.60
REFUSED/DON'T KNOW	0	0.0
OTHER COUNTRY	678	9.5
HIGHEST GRADE COMPLETED: POPULATION		
18 +		
NO GRADE - 1	0	0.0
GRADES 1-8	507	7.1
GRADES 9-12	3,674	51.0
SOME COLLEGE	1,374	19.0
BA DEGREE	599	8.4
SOME GRADUATE	333	4.7
GRADUATE DEGREE	333	4.7
BUSINESS/TRADE SCHOOL	18	.25
REFUSED/DON'T KNOW	134	1.88

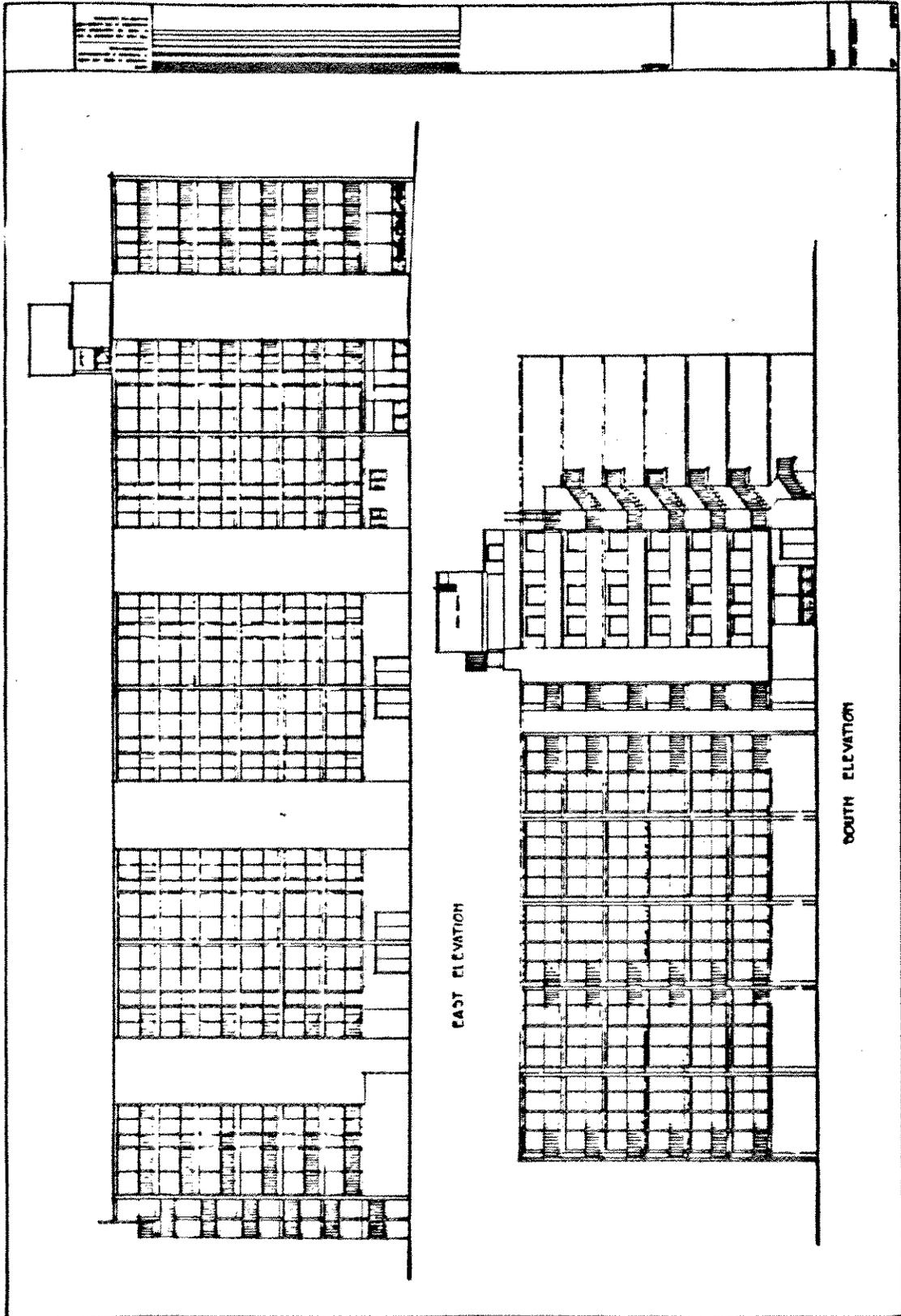
	<u>No.</u>	<u>%</u>
PERSONAL INCOME (IN 1975)		
MEAN (APPROXIMATE)	\$ 6,600	
HOUSEHOLD INCOME		
MEDIAN (APPROXIMATE)	\$12,300	
MEAN (APPROXIMATE)	\$15,000	
PERCENT BELOW POVERTY		
EMPLOYMENT STATUS. POPULATION (OVER 14)	4,647	100.0
EMPLOYED PART OR FULL TIME	2,355	50.7
UNEMPLOYED, LOOKING FOR WORK	250	5.4
NOT IN LABOR FORCE	1,476	31.8
ACTIVE MILITARY	124	2.7
RETIRED	442	9.5
NO DATA/REFUSED/DON'T KNOW	0	0.0
INDUSTRY OF EMPLOYED POPULATION (OVER 16)		
AGRICULTURE, HUNTING, FISHING		1.0
MINING AND CONSTRUCTION		13.5
MANUFACTURING		3.8
TRANSPORTATION, COMMUNICATION, GAS		9.3
WHOLESALE		1.0
RETAIL		13.9
FINANCE AND INSURANCE		2.1
SERVICE (INCLUDING HOTELS)		41.7
GOVERNMENT		13.4
MISC. REFUSED/DON'T KNOW		1.4
UNEMPLOYMENT		
PERSONS 16 LOOKING FOR WORK		9.6
AGRICULTURE, FISHING, HUNTING		25.0
CONSTRUCTION AND MINING		0.0
MANUFACTURING		10.0
TRANSPORTATION, COMMUNICATION, GAS		0.0
WHOLESALE		16.7
RETAIL		14.5
FINANCE, INSURANCE, REALESTATE		0.0
SERVICE		4.5
GOVERNMENT		6.5
REFUSED/DON'T KNOW		0.0
HOUSING OWNERSHIP		
OWNED/BEING BOUGHT (INCLUDING COOP/CONDO)		44.0
RENTED/OCCUPIED NO CASH		56.0

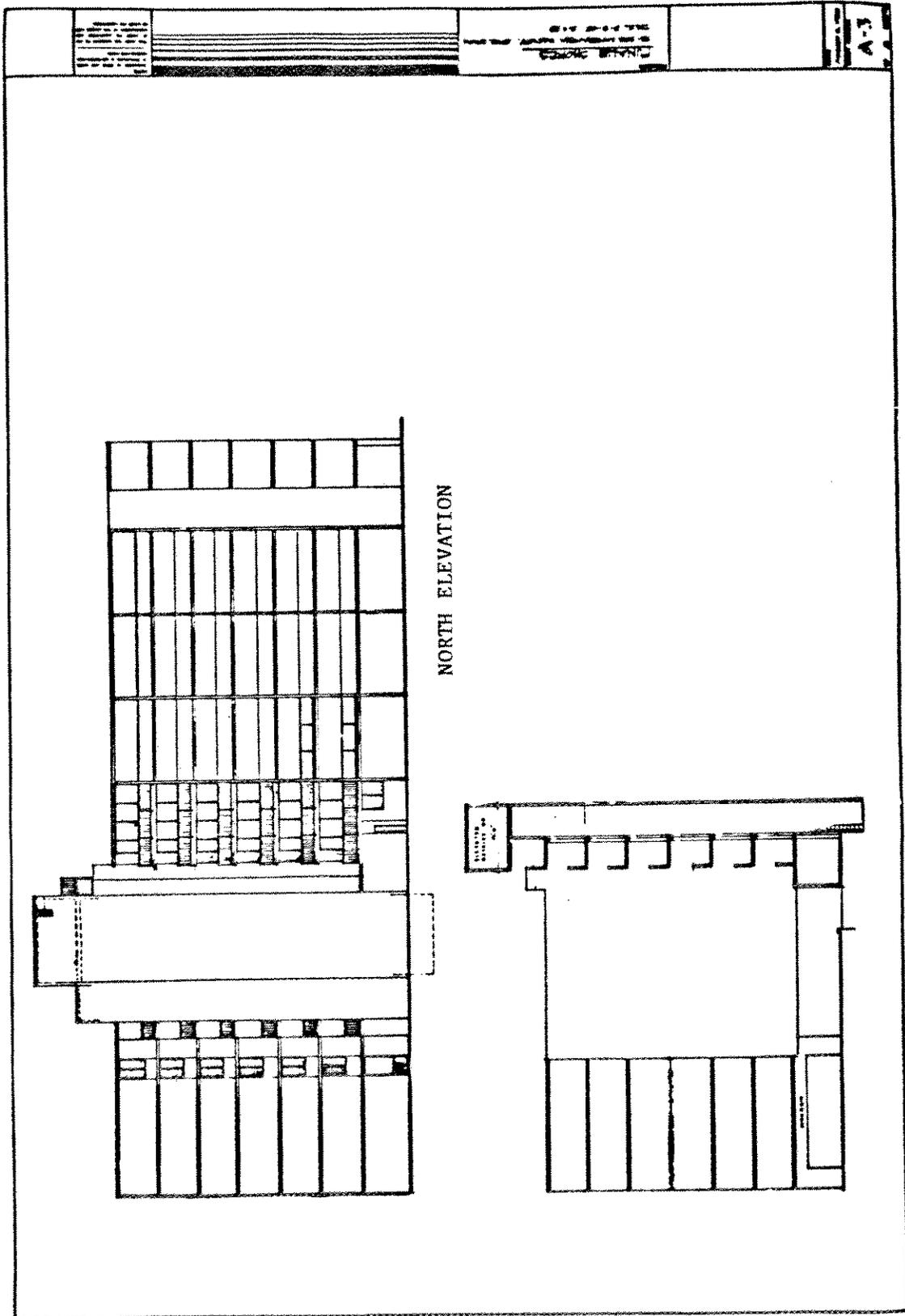
	<u>No.</u>	<u>%</u>
TOTAL MONTHLY HOUSING COSTS FOR OWNER OCCUPIED UNITS	938	100.0
MORTGAGE PAID		
UNDER \$100		31.6
\$100-\$199		12.5
\$200-\$299		17.6
\$300-\$399		13.0
\$400-\$499		8.0
\$500 OR MORE		6.4
NOT APPLICABLE/REFUSED/DON'T KNOW		11.0
MEDIAN (APPROXIMATE)	\$200	
MEAN (APPROXIMATE)	\$205	
 TOTAL MONTHLY RENT FOR RENTAL UNITS	 1,097	 100.0
UNDER \$100		3.8
\$100-\$199		37.0
\$200-\$299		38.0
\$300-\$399		15.6
\$400-\$499		1.5
\$500 OR MORE		.2
REFUSED/DON'T KNOW		1.3
MEDIAN (APPROXIMATE)	\$221	
MEAN (APPROXIMATE)	\$228	

APPENDIX B

ELEVATIONS OF THE PROPOSED PUNALUU SHORES BUILDING







APPENDIX C

DRAINAGE STUDY

PUNALUU APARTMENT-HOTEL

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1973 AUG 20 AM 11 59

DEPT OF
LAND & NATURAL RESOURCES
HONOLULU

DRAINAGE STUDY
PUNALUU APARTMENT-HOTEL

DRAINAGE STUDY
PUNALUU APARTMENT-HOTEL

PURPOSE

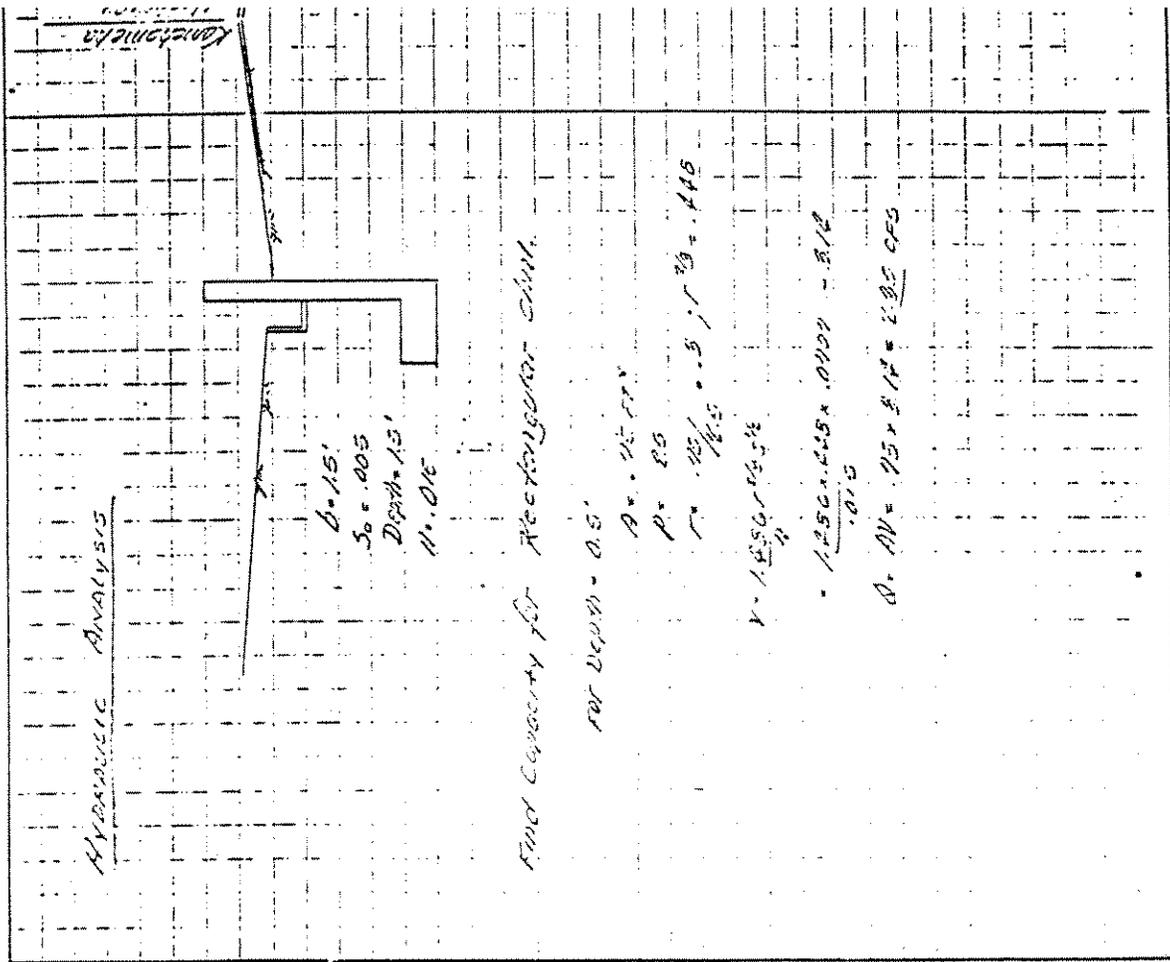
This drainage study is for the development of a hotel-apartment complex in Punaluu, Oahu, Hawaii. The 1.8 acre site is shown on the location map (Figure 1) and on the site plan (Figure 2). The proposed grading and drainage plan for this site is shown in Figures 3 and 4.

EXISTING CONDITIONS

The site, which is mauka of Kamehameha Highway, slopes away from the highway from an elevation of seven feet to an elevation of two feet at the back lot. A ditch exists along the southern boundary of the site and drains into the ocean under the highway via a 6-foot by 4-foot box culvert which is partially clogged with sand and debris at this time.

The back lot is drained by existing canals or swales (see Figure 1). These swales which are west of the site, are shown on the U. S. Geological Survey Quadrangle sheet and probably were used to irrigate the rice paddies many years ago and, subsequently, used to irrigate the sugar cane grown there. It appears that the drainage from the mountains and the low-lying areas are collected by these canals and eventually conveyed to the ocean through the existing bridge across Kamehameha Highway, approximately 800 feet north of the proposed apartment-hotel site. These swales, however, are now overgrown with tall grass.

In the low-lying areas mauka of the highway, historic flooding up to approximately elevation six feet has been noted. There are approximately six residences in this low-lying area to the west of the site.



PROPOSED GRADING AND DRAINAGE

The proposed project site plan and grading are shown in Figure 3. The drainage system is shown in Figure 4. The lot will be filled to elevation 9.5 feet for both the sewage treatment plant and the apartment area. The hotel building will have a first floor elevation of 10.0 feet. The site grading was designed to drain as much of the onsite storm runoff to the existing ditch along the southern boundary to reduce flooding that exists in the low-lying area to the west of the property. The existing ditch (south boundary) will be cleared and should aid in relieving the existing flooding in the low-lying area.

The onsite drainage improvements being proposed are a grass swale to drain the western area of the site and a concrete channel section to drain the northeast part of the site. Drainage area boundaries and computed peak discharges used are shown in Figure 3, and substantiating calculations are included in the Appendix.

SUMMARY

The proposed grading and drainage plan shown in Figure 3 is necessary to keep the apartment-hotel complex and sludge treatment plant from being inundated during large storms. By directing the storm water falling on the project property to the highway culvert and cleaning the existing ditch leading to the culvert, a beneficial, rather than detrimental, effect is anticipated for the surrounding low-lying area.

Project Title: CONCRETE TECHNOLOGY Prepared By: RM Date: 5-15-58

Location: CONCRETE TECHNOLOGY Item: CONCRETE TECHNOLOGY Checked By: RM Date: 5-15-58

CONCRETE TECHNOLOGY BY BRITANAL METHOD
 AT KUNDHU I HAWI TOWNSHIP FOR THE R.M. = 2.5 CM
 ON 0.50 Meter - Approx. 1000 sq. ft. Area.
 USE 6mm ϕ $\therefore 1 = 8.9 \times 8.9 = 8.9$
 $Q1 = 0.9 \times 8.9 = 7.90$ W/MR
 $\therefore A = 0.14$ Acres
 $B = 7.90 \times 1.9 = 1.50$ CFS

FOR GRADE SPACE
 ① $A = .82$ Acres
 $B = 7.90 \times 1.9 = 1.50$ CFS
 ② $A = .82$ Acres
 $B = 7.90 \times 1.9 = 1.50$ CFS

FOR RECTANGULAR CHANNEL
 ① $A = .82$ Acres
 $B = 7.90 \times 1.9 = 1.50$ CFS
 ② $A = .82$ Acres
 $B = 7.90 \times 1.9 = 1.50$ CFS

Project Title: CONCRETE TECHNOLOGY Prepared By: RM Date: 5-15-58

Location: CONCRETE TECHNOLOGY Item: CONCRETE TECHNOLOGY Checked By: RM Date: 5-15-58

CONCRETE TECHNOLOGY BY BRITANAL METHOD
 FOR DEPTH - 10 FT
 $A = 1.5$ FT
 $P = 3.0$
 $R = 1.5$ FT
 $V = 1.5 \times 3.0 \times 1.5 = 6.75$ CFS
 $D. AV = 1.5 \times 3.0 = 4.5$ CFS

FOR DEPTH - 15'
 $A = 1.5$
 $P = 4.5$
 $R = 1.5$ FT
 $V = 1.5 \times 4.5 \times 1.5 = 10.125$ CFS
 $D. AV = 1.5 \times 4.5 = 6.75$ CFS

FOR DEPTH - 15'
 $A = 1.5$
 $P = 4.5$
 $R = 1.5$ FT
 $V = 1.5 \times 4.5 \times 1.5 = 10.125$ CFS
 $D. AV = 1.5 \times 4.5 = 6.75$ CFS

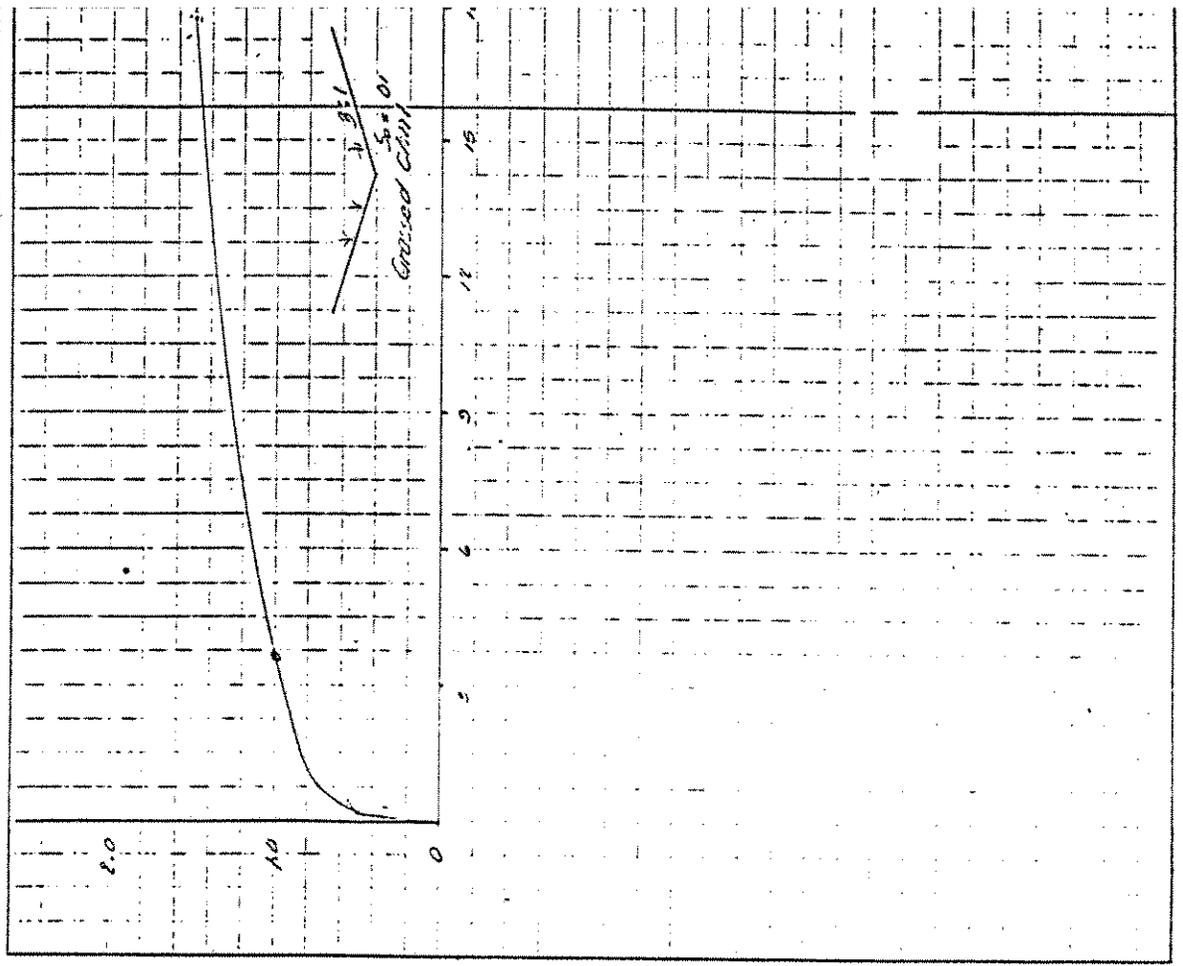
Project Title _____ JOB NO. _____ Page _____ of _____
 Location _____ Prepared By: CAK Date: 2/2/50
 Item _____ Checked By: _____ Date _____

TRY 18' x 20' UNDER SOUTH DRIVEWAY
 $R = 6.2055$
 from 1/4" chart
 $H = 11.8$
 $H = 12 \times 11.8 = 179'$
 H₁ available to top of grade = 2.0' O.K.
 $\text{slope of } 15' \text{ rise} = \frac{1}{15} = .0667$
 from points given on page 23 determine
 correct H₁ for under even
 channel conditions - approximately
 depth = 2.67'

Project Title _____ Prepared By: CAK Date: 2/2/50
 Location _____ Checked By: _____ Date _____
 Item _____

COMPUTE CAPACITY FOR GRADED CHANNEL

 $\text{FOOT DEPTH} = 10 \text{ FT}$
 $A = 25 \times 5 = 125$
 $P = 25 + 10 = 35$
 $R = \frac{A}{P} = \frac{125}{35} = 3.57$
 Assume $n = .05$ (Barnetts Chart) $C = 1.49$
 $V = 1.49 \times 1.5 \times 3.57 = 7.8$
 $Q = 7.8 \times 10 \times 25 = 1950 \text{ CFS}$
 Assume $n = .045$
 $V = 1.49 \times 1.5 \times 3.57 = 8.1$
 $Q = 8.1 \times 10 \times 25 = 2025 \text{ CFS}$



CONTINUED - ALL: Ground Curve
 $5.3 = 3.1$

Area = 24.710 = 9.16
 $R = .131$, $R^2 = .017$

Assume $D = .8$
 $R = \frac{1.456 \times 1.987 \times 1}{.8}$

\rightarrow OK

$D = .8$
 $R = .55 \times .87 = .48$

Area = 24.710 = 9.16
 $R = .131$, $R^2 = .017$

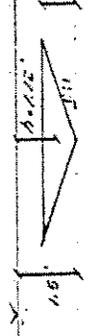
Assume $D = 1.0$
 $R = .55 \times 1.0 = .55$

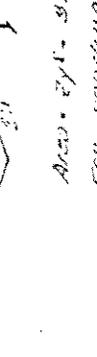
\rightarrow OK

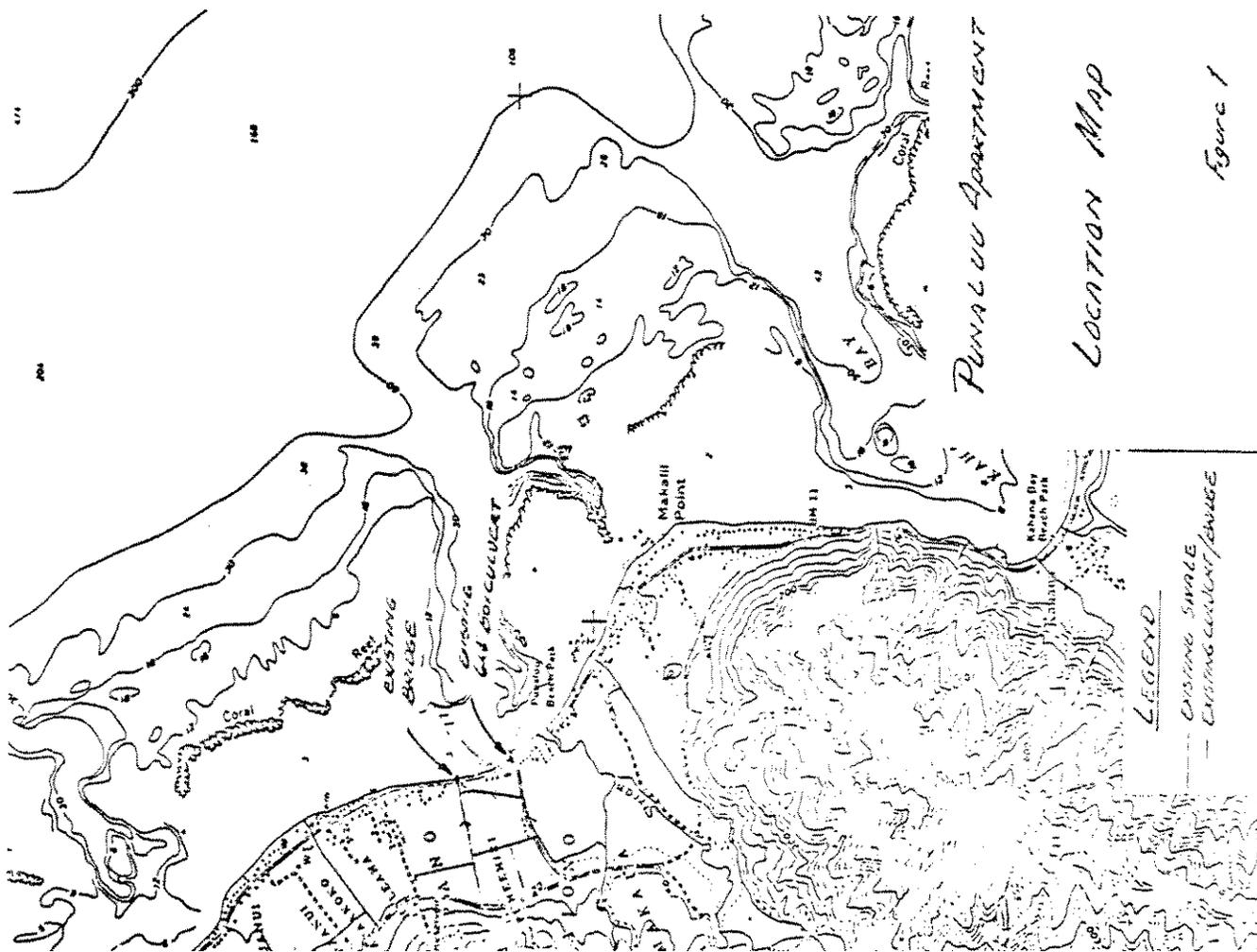
Area = 24.710 = 9.16
 $R = .131$, $R^2 = .017$

Assume $D = 1.2$
 $R = .55 \times 1.2 = .66$

\rightarrow OK

<p>TRY</p>  <p>Area of opening = 95.778</p> <p>A = 0.0787</p> <p>N = 145' head to center of opening</p> <p>6 x 7.57 EFFICIENTS</p> <p>4.54 CFS</p> <p>NO 6000 < 6.5 CFS</p>	<p>TRY</p>  <p>Area = 165.778</p> <p>0 = 0.0787</p> <p>6 x 165.778 EFFICIENTS</p> <p>6.5 CFS</p> <p>> 6.5 CFS O.K.</p>
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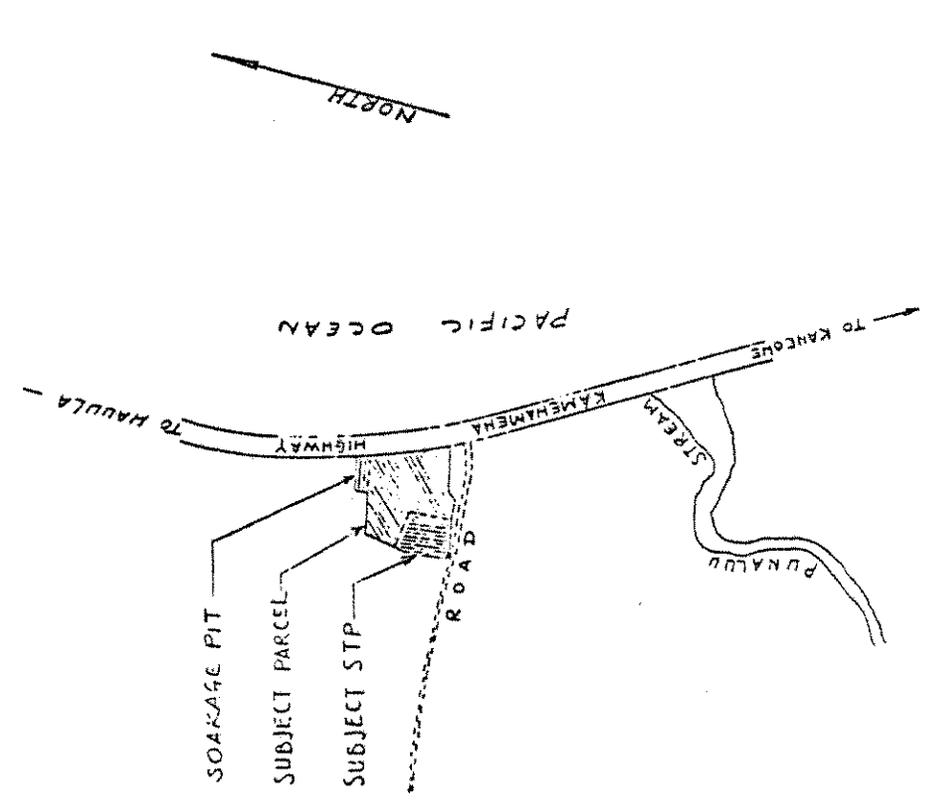
<p>Flow will be required to pass 6.5 CFS in Grassed Swale through wall.</p>  <p>top of flow c/c</p> <p>MINIMUMS PENNING</p> <p>ELEV. 4.2'</p> <p>INVERT ELEV. 6.0</p> <p>5.54 CFS</p>	<p>TRY</p>  <p>Area = 95.778</p> <p>FOR PENNING DEPTH = 1.5', FIND A</p> <p>A = 0.0787</p> <p>A = 10.8 CFS</p> <p>A = 10.8 CFS</p> <p>O.K. MINIMUMS 6.5 CFS AT PENNING</p> <p>Depth = 1.5'</p>
--	--



Punahoa Apartment
Location Map

LEGEND
 --- EXISTING SIMILE
 --- EXISTING CONCRETE/PAVEMENT

Figure 1



PUNAHOA HOTEL - APARTMENT

SITE LOCATION

SCALE: 1" = 400'

T.M.K. 5-3-05 - 2 & 3

FIGURE 2

HONOLULU, HAWAII 96813

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FRANK P. PARI
MANAGER
PAUL DEVENA
MANAGING DIRECTOR

1973 NOV 7 PM 12 38



DEPT OF
LAND AND NATURAL RESOURCES
STATE OF HAWAII

EDWARD Y. HIRATA
DIRECTOR AND CHIEF ENGINEER
HAKU MATASHIDA
DEPUTY DIRECTOR AND
DEPUTY CHIEF ENGINEER
EC 73-1507

November 5, 1973

TO : MR. GEORGE MORIGUCHI, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM : EDWARD Y. HIRATA, DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF PUBLIC WORKS

SUBJECT: CONDITIONAL USE PERMIT (72/CUP-21)
TAX MAP KEY: 5-3-05: 38
APPLICANT: W I C LTD.

This supplements our earlier comments of July 23, 1973 (EC 73-1022) on this CUP.

The drainage study by R. M. Towill Corporation has been reviewed and is acceptable.

We concur with the report conclusion that filling of the proposed site will not measurably or adversely affect surrounding properties in the flood plain. The increase of flood elevation of less than 1/4 inch is considered to be insignificant.

Minor surface drainage problems resulting from the construction of the retaining wall along the Kabuku boundary can be evaluated and resolved with the final grading plan.

Edward Y. Hirata
EDWARD Y. HIRATA
Director and Chief Engineer

APPENDIX D

HAWAII CZM PROGRAM
ASSESSMENT FORMAT

HAWAII CZM PROGRAM
ASSESSMENT FORMAT

RECREATIONAL RESOURCES

Objective: Provide coastal recreational opportunities accessible to the public.

Policies

- 1) Improve coordination and funding of coastal recreation planning and management.
- 2) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:
 - a) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;
 - b) Requiring replacement of coastal resources having significant recreational value, including but not limited to surfing sites and sandy beaches, when such resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the State for recreation when replacement is not feasible or desirable;
 - c) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;
 - e) Encouraging expanded public recreational use of County, State, and Federally owned or controlled shoreline lands and waters having recreational value;
 - f) Adopting water quality standards and regulating point and non-point sources of pollution to protect and where feasible, restore the recreational value of coastal waters;
 - g) Developing new shoreline recreational opportunities, where appropriate, such as artificial reefs for surfing and fishing; and
 - h) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, county planning commissions; and crediting such dedication against the requirements of section 46-6.

IMPACT ON RECREATIONAL RESOURCES

Policies:

- 1) Not applicable.
- 2)
 - a) The project site is not adjacent to the shoreline; nor is it uniquely suited for recreational activities.
 - b) The site is not found to have significant recreational value.
 - c) The shoreline area in the vicinity of the project is almost entirely open to recreational use.
 - e) Note: no d). Not applicable to the project.
 - f) Not applicable to the project.
 - g) Not applicable to the project.
 - h) Not applicable to the project.

HISTORIC RESOURCES

Objective: Protect, preserve, and where desirable, restore those natural and man-made historic and pre-historic resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies

- 1) Identify and analyze significant archaeological resources;
- 2) Maximize information retention through preservation of remains and artifacts or salvage operations; and
- 3) Support State goals for protection, restoration, interpretation, and display of historic resources.

Discussion:

There are no known historical and/or archaeological resources or sites on the project site. Nor will any known historical/archaeological sites be affected by this project.

SCENIC AND OPEN SPACE RESOURCES

Objective: Protect, preserve and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies

- 1) Identify valued scenic resources in the coastal zone management area;
- 2) Insure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;
- 3) Preserve, maintain and, where desirable, improve and restore shoreline open space and scenic resources; and
- 4) Encourage those developments which are not coastal dependent to locate in inland areas.

Discussion:

The view plane along the coastal zone will be affected. The 7-story hotel will be visible from various high points along the coastline. The development, is dependent on the location because of the zoning designation and its proximity to the shoreline which enhances its use to a visitor from outside the island or to the local resident who wants to utilize their unit as a vacation residence.

COASTAL ECOSYSTEMS

Objective: Protect valuable coastal ecosystems from disruption and minimize adverse impacts on all coastal ecosystems.

Policies

- 1) Improve the technical basis for natural resource management;
- 2) Preserve valuable coastal ecosystems of significant biological or economic importance;
- 3) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and
- 4) Promote water quantity and quality planning and management practices which reflect the tolerance of fresh water and marine ecosystems and prohibit land and water uses which violate State water quality standards.

Discussion:

The water quality should not be adversely affected; as identified in the Final EIS, subsection 5.5, item (a), water quality is presently being adversely affected by the present cesspools. The proposed project intends to utilize a private sewage treatment plant which will provide the sewage generated by the project with secondary treatment. The effluent will be disposed in injection wells which have been approved by the Department of Health. Prior to certifying the plant for use, the Department of Health requires a monitoring of the effluent to insure that the effluent meets the standards set by Chapter 38 relating to sewage treatment plants.

ECONOMIC USES

Objective: Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies

- 1) Concentrate in appropriate areas the location of coastal dependent development necessary to the State's economy.
- 2) Insure that coastal dependent development such as harbors and ports, visitor industry facilities, and energy generating facilities are located, designed, and constructed to minimize adverse social, visual, and environmental impacts in the coastal zone management area; and
- 3) Direct the location and expansion of coastal dependent developments to areas presently designated and used for such development and permit reasonable long-term growth at such areas, and permit coastal dependent development outside of presently designated areas where
 - a) Utilization of presently designated locations is not feasible;
 - b) Adverse environmental effects are minimized; and
 - c) Important to the State's economy.

Discussion:

Policies:

- 1) The project is not in an area of concentration of development. However, there are two other hotels in the area.
- 2) Environmental impacts are described in the Final EIS document.
- 3) The project site is being developed because of its desirable location and the H-1 zoning of the property.

COASTAL HAZARDS

Objective: Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, and subsidence.

Policies

- 1) Develop and communicate adequate information on storm wave, tsunami, flood, erosion, and subsidence hazard;
- 2) Control development in areas subject to storm wave, tsunami, flood, erosion, and subsidence hazard;
- 3) Ensure that developments comply with requirements of the Federal Flood Insurance Program; and
- 4) Prevent coastal flooding from inland projects.

Discussion:

Information on flooding and tsunamis are provided in the text of the Final EIS. The site will be graded to prevent flooding of the sewage treatment plant. The hotel will be built so that the living units are above the second floor (so as to prevent flooding).

MANAGING DEVELOPMENT

Objective: Improve the development review process, communication, and public participation in the management of coastal resources and hazards.

Policies

- 1) Effectively utilize and implement existing law to the maximum extent possible in managing present and future coastal zone development;
- 2) Facilitate timely processing of application for development permits and resolve conflicting permit requirements; and
- 3) Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the general public to facilitate public participation in the planning and review process.

Discussion:

These management objective and policies are not applicable to the proposed project.