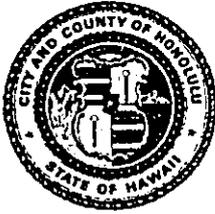


DEPARTMENT OF PARKS AND RECREATION  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET  
HONOLULU, HAWAII 96813



FRANK F. FASI  
MAYOR

WALTER M. OZAWA  
DIRECTOR

ALVIN K.C. AU  
DEPUTY DIRECTOR

RECEIVED

November 12, 1992

'92 NOV 12 P3:19

Mr. Brian J. J. Choy, Director  
Office of Environmental Quality Control  
State of Hawaii  
Central Pacific Plaza  
220 South King Street, Fourth Floor  
Honolulu, Hawaii 96813

OFFICE OF ENVIRONMENTAL  
QUALITY CONTROL

Dear Mr. Choy:

Subject: Final Environmental Assessment (EA) and Negative Declaration for  
Construction of Maintenance-Type Improvements at Kailua Beach Park

We are forwarding for your review and publication in the OEQC Bulletin the  
Negative Declaration and four copies of the final EA for construction of  
maintenance type improvements at Kailua Beach Park.

Comments and responses are attached to the final EA. Also attached is the  
parking survey data which was inadvertently left out from the draft EA.

No revisions were made to the draft EA for the following reasons:

1. The department feels that the draft EA adequately addressed  
environmental/shoreline management concerns.
2. Comments and objections by both the Citizens for Camp Kailua and Hawaii's  
Thousand Friends were directed toward coercing the City into retaining the  
former Camp Kailua site for cabin camping use. The department has  
determined that this use is not feasible because of the high density beach  
use, and camping use is not compatible with the urban environment of  
Kailua.

Sincerely,

  
WALTER M. OZAWA, Director

WMO:ei

Attachments

197

1992-12-08-0A-~~FEA~~-Kailua Beach Park  
Maintenance

DEC 8 1992

FINAL  
ENVIRONMENTAL ASSESSMENT  
FOR  
MAINTENANCE-TYPE IMPROVEMENTS  
AT  
KAILUA BEACH PARK  
KOOLAUPOKO, OAHU, HAWAII

Proposing Agency: Department of Parks and Recreation  
City and County of Honolulu

Accepting Authority: Not applicable

Agencies Consulted: Maintenance-type actions do not require  
consultation

I. GENERAL DESCRIPTION OF THE ACTION'S TECHNICAL, SOCIAL AND  
ECONOMIC CHARACTERISTICS

A. Technical Characteristics

The proposed action includes:

1. Demolition of seven old houses and ancillary structures located on the west side of Camp Kailua. This area will be cleared, graded and landscaped to blend with the surrounding beach park.
2. Demolition of all structures except the "fale" and "L-shaped" building (dormitory) at Camp Kailua. This area will also be cleared, graded and landscaped.
3. Renovation of the existing beach park pavilion/concession building. This project involves replacing several sections of deteriorated exterior walls; providing more openings in exterior walls to improve ventilation; replacing waterproof material on the roof; upgrading of interior plumbing fixtures and moving interior walls to meet handicapped requirements; resloping interior floors to improve drainage; replacing deteriorated interior structural metals where necessary; and installation of a new four-inch water lateral from Makalii Place to the park pavilion.
4. Upgrading and/or replacing irrigation lines and sprinklers throughout the park and extending irrigation lines to adequately cover all landscaped areas.

## B. Social/Recreation Characteristics

The Department of Parks and Recreation has established its position on the following:

1. Beach parks are recreation resources which are acquired and developed for islandwide use. They are not in the category of community or district parks.
2. The Camp Kailua site and adjacent former private house lots were acquired with the express intent of creating more open space and a contiguous stretch of beach park.
3. The Department of Parks and Recreation recognizes the desire for cabin camping and does sympathize with the elderly and physically challenged who require special accommodations such as cabins and accessible amenities. However, the department has determined that Camp Kailua is not the most desirable location for this type of activity. Cabin camping should be provided in a wilderness or other suitable environment which is isolated from urbanization.

The State of Hawaii has transferred Kaiaka Bay and Waimanalo Bay State Parks to the City and County of Honolulu. The Department of Parks and Recreation will look into the feasibility of providing cabin camping facilities at one or both of these parks.

## C. Economic Characteristics

The following is the cost breakdown for various improvements:

Pavilion renovations	\$338,000
New water line	35,000
Demolition, clearing and landscaping (former private house lots)	115,000
Demolition, clearing and landscaping (Camp Kailua)	110,000
Upgrading irrigation system	100,000

All demolition and clearing work will be done in-house.

## II. APPLICABLE LAND USE PLANS, POLICIES AND CONTROLS

The State Land Use Commission has classified most of Kailua Beach Park within the Urban District. Kaelepulu Stream mauka of the Kawaihoa Road bridge and lands seaward of the shoreline are classified within the Conservation District. The Urban District is not subject to State regulation. The State Board of Land and Natural Resources must approve a Conservation District Use Application for improvements within the Conservation District.

The City Koolaupoko Development Plan (DP) Land Use Map designates most of Kailua Beach Park as park and recreation. The DP Land Use Map designates the house lots (acquired for park expansion) west of Camp Kailua as Residential and all of Kaelepulu Stream as Preservation. Public improvements are allowed in all DP Land Use Map designations. Most of Kailua Beach Park is zoned P-2. Kaelepulu Stream and its banks mauka of the Kawaihoa Road bridge are P-1. Camp Kailua and the house lots (acquired for park expansion) west of Camp Kailua are zoned R-7.5. The City Land Use Ordinance allows public park improvements in all zoning districts.

The entire Kailua Beach Park is within the City Special Management Area (SMA). However, State law explicitly provides that no SMP is required for routine maintenance dredging of existing streams; maintenance or interior alterations of existing structures; demolition or removal of structures not listed on the National or State Register of Historic Places; and installation of underground utility lines and appurtenant aboveground fixtures. These activities are exempt unless any of these actions are or might become a part of a larger project which might have significant environmental impacts. It is the department's opinion that even taken collectively, there will be no significant environmental impacts, therefore, all the actions should be exempt. The courts disagree, hence, the department is processing this major SMP.

The Flood Insurance Rate Map (FIRM) designates most of Kailua Beach Park as being within Zone X, outside the 500-year floodplain. Mauka of the Kawaihoa Road bridge, Kaelepulu Stream, and low-lying parts of its banks are designated within floodway Zone AE on the applicable FIRM with a projected 100-year flood elevation of two feet above mean sea level. Any development in Zone AE requires City Department of Public Works' (DPW) approval of a Flood Hazard District Declaration. Although DPW must review and approve improvements which affect drainage, no Flood Hazard District Declaration is required for development in Zone X. All the proposed actions are in Zone X.

### III. SUMMARY DESCRIPTION OF THE AFFECTED ENVIRONMENT

#### A. Topography and Soils

Kailua Beach Park is at the eastern edge of a coastal plain which extends over two miles inland to the mauka sides of Kaelepulu Pond and Kawainui Marsh. Alala Point and the park hillside mauka of Alala Road are higher ground overlooking the coastal plain. While most of Kailua Beach Park is less than 10 feet above mean sea level, the summit of the park hillside is about 265 feet above mean sea level.

Coastal parts of the beach have soils primarily composed of calcareous beach sand. Alala Point and the hillside mauka of Alala Road are rocky and have soils derived from decomposed rock.

#### B. Beach Processes

Kailua Beach is about 13,000 feet long and is bounded by Kapoho Point on the northwest and Alala Point on the southeast. Kailua Beach Park has about 2,800 feet of sandy frontage at the Alala Point end of Kailua Beach. A sandy bottom extends far offshore allowing excellent conditions for wading and swimming.

An analysis of aerial photographs by the Department of Land Utilization's consultants (Oahu Shoreline Study) found that between November 1949 and February 1988, the vegetation line moved seaward over the entire length of Kailua Beach because of accreting sand. During this period, despite the general trend, there was considerable fluctuation in the Kailua Beach vegetation line. The most extreme shoreline fluctuations occurred makai of Camp Kailua where within 38 years there was a 146-foot range between the most mauka and most makai position of the vegetation line.

Although changes in wind and swell direction cause Kailua Beach to naturally accrete and erode, fluctuations are magnified in the vicinity of the Kailua boat ramp. The boat ramp acts like a groin causing up-drift accretion and down-drift erosion. During predominant east and northeast tradewind conditions, the beach is considerably wider in front of the boat trailer parking area than in front of Camp Kailua. Winds from most other directions cause accretion in front of Camp Kailua and scouring on the Lanikai side of the boat ramp.

In 1977, so much trade-generated beach erosion occurred makai of Camp Kailua that the DPR had to install a 400-foot long sand grabber to stop erosion from damaging the Alala parking lot and undermining the boat ramp. The sand grabber is parallel to and about 75 feet makai of the parking lot, and its Lanikai end abuts the boat ramp. Although now entirely buried beneath the beach, every few years the top of the sand grabber is exposed by beach erosion.

C. Rainfall, Drainage and Water Resources

Median annual rainfall at Kailua Beach Park is about 35 inches. Neither Kailua Beach Park nor abutting properties are served by City storm drains. Most rainfall on the park and abutting lands on the coastal plain infiltrates into the sandy soil. After heavy rains, runoff commonly ponds for a day or two on the unpaved Kawaihoa Road shoulder mauka of the house lot area.

Between Alala and Lihiwai Roads, Kawaihoa Road is higher than the coastal plain on its mauka side. During heavy rains, runoff from the hillside mauka of Alala Road sheet flows to Kaelepulu Stream across house lots mauka of Kawaihoa Road.

Prior to 1965, Kaelepulu Stream drained both the Kaelepulu and Maunawili watersheds and was the only perennial stream discharging into Kailua Bay. Surface and ground water from the Maunawili watershed and Kawainui Marsh are now impounded by a levee and discharge into the northwest end of Kailua Bay through the man-made Oneawa channel. Since construction of the Kawainui levee and Oneawa channel, the Kaelepulu channel has had adequate capacity to handle runoff from the heaviest rainfall likely to occur within 100 years if its outlet is maintained. The City DPW bulldozes an opening in the stream-mouth sand bar whenever it rains. Otherwise, the sand is usually intact.

The brackish Kaelepulu Stream estuary is the only surface water resource in Kailua Beach Park. There is no potable aquifer underlying the park.

D. Water Quality

Ocean water quality offshore of Kailua Beach Park is excellent. Because of the nature of inland runoff and poor circulation, the Kaelepulu Stream estuary often naturally contains too much coliform bacteria to meet State water quality standards.

**E. Natural and Man-Made Hazards and Nuisances**

Portuguese men-of-war (jellyfish) blown on-shore by tradewinds are the only significant natural hazard at Kailua Beach Park. The park is not at risk from flooding, subsidence, or long-term beach retreat and park-goers are not exposed to strong currents, large breaking waves, air pollution or noise.

**F. Vegetation and Fauna**

Kailua Beach park is a highly urbanized park and contains no endangered, rare or uncommon plants or animals. Virtually all plants and land animals present are introduced species. Landscaped areas commonly contain ironwood, monkeypod, banyan, coconut, hau, milo and various grasses. The hillside mauka of Alala Road is primarily covered with haole koa.

**G. Historic Sites and Archaeological Resources**

No historic or archaeological sites remain on the surface of Kailua Beach Park. Burials and other artifacts from Hawaiian occupation may be present beneath the surface.

Any subsurface archaeological resources within the park's sandy soils will probably be of relatively recent origin. The geology and historic rate of sand accretion at Kailua Beach Park suggest that three to four centuries ago, except for the Alala Point area, all low-lying parts of the park were seaward of the shoreline. By way of illustration, tracing an October 1884 George E. Jackson survey of Kailua Bay onto modern tax maps reveals the 1884 shoreline running along the makai property line of Camp Kailua and the house lot area. In 1884, the site of the pavilion and the most mauka-Kailua corner of the park (where the pavilion access road enters the park) were seaward of the shoreline, and what is now Lihiwai Road, was the center of the Kaelepulu Stream channel.

**H. Coastal Views**

The pavilion and dune crest makai of the pavilion block most, but not all, ocean views from Lihiwai Road across the pavilion parking lot. There is a scenic view from the Kawailoa Road bridge of the shoreline at the Kaelepulu Stream mouth. The dune crest blocks most, but not all, ocean views from Kawailoa Road across the Kawailoa parking lot. Ocean views from Kawailoa Road across the house lot area and Camp Kailua are completely

obstructed by structures, shrubs and some ironwood trees. There are striking views of the ocean and shoreline from Alala Road between the Alala parking lot and Alala Point.

#### I. Park and Nearshore Recreational Uses

Kailua Beach Park is heavily used by picnickers, walkers, joggers, swimmers, sunbathers, windsurfers, canoes and sailers. Between 1984 and when Camp Kailua was closed in April 1991, Kailua Beach Park was also used for meetings and cabin camping. Park use is higher on weekdays during the summer than during the school year and higher on weekends and holidays than on weekdays. A 1975 survey of park users found that over 80 percent were windward Oahu residents. The 1978 Master Plan estimated average weekday use as 545 persons/day, average weekend use as 1,573 persons/day, and peak weekend use as 2,926 persons/day.

A survey of park use at noon on Sunday, May 26, 1991 found that although most of the park was heavily used, some parts were virtually unused including a large clearing on the Kailua side of the pavilion parking lot, the house lot area, Camp Kailua, and the hillside mauka of Alala Road. The clearing was probably unused by picnickers because of lack of shade, while the other areas were either not improved for public use or closed to the public.

Recreational conflicts have led the State Department of Transportation to adopt rules regulating recreational uses of Kailua Beach Park shore waters. Windsurfers have first priority for use of shore waters abutting 300 feet of the Kailua end of the park. When these shore waters are in use by windsurfers, motor vessels and swimmers are prohibited. Outrigger canoes have first priority for use of shore waters abutting 100 feet of shoreline at the mouth of Kaelepulu Stream. When these shore waters are in use by manually propelled vessels, swimmers are prohibited. Otherwise, to protect swimmers, all vessels and windsurfers are prohibited from using park shore waters beginning 300 feet from the Kailua end of the park and ending 275 feet from the boat ramp's Kailua side.

#### J. Adjacent Land Uses

As shown in Figures 1 and 2, Kailua Beach Park is surrounded by private houses. A few private businesses and churches are located on the mauka side of Kawailoa Road.

**K. Parking and Traffic**

Kailua Beach Park has enough internal parking to accommodate users on weekdays. However, as summarized in Appendix C, weekend parking demand exceeds the estimated 516 vehicle and 34 trailer parking spaces within the park. Illegal parking is common on weekends within the makai portions of the park and abutting streets.

Traffic counts and visual observation confirm that streets abutting Kailua Beach Park have ample capacity to accommodate both peak weekday and peak weekend traffic.

**IV. SUMMARY OF IMPACTS AND MITIGATION MEASURES (POSITIVE, NEGATIVE OR NO IMPACT)**

**A. Topography, Soils and Beach Processes**

No impacts are anticipated.

**B. Drainage and Water Quality**

Removal of old houses and ancillary structures and landscaping this area will reduce runoff which currently ponds on the Kawaihoa Road shoulder after heavy rainfall.

After demolition of structures at Camp Kailua, the area will be immediately cleared and landscaped, thus, negating the possibility of surface runoff into the beach area and coastal waters. Likewise, trenches required for irrigation lines will be immediately covered and grassed.

Interior and exterior renovation work on the pavilion will not affect drainage or water quality.

**C. Hazards, Nuisances and Aesthetics**

The former private houses and ancillary structures are now an eyesore and may be a haven for illicit activities. Removal of these structures and clearing the dense vegetation will rid the area of these problems and also eliminate the City's liability risks.

Also, clearing the former house lot area and removal of some structures at the Camp Kailua site will open some coastal views from Kawaihoa Road.

**D. Archaeological Resources**

Potentially, mauka parts of the beach park abutting the makai sides of Makalii Place, Kawailoa Road and Alala Road may contain Hawaiian burials or artifacts up to four centuries old. Before undertaking excavation for new sprinkler lines or planting of trees, the DPR will develop a subsurface archaeological impact mitigation plan acceptable to the State Department of Land and Natural Resources, Historic Preservation Division. If necessary, an archaeologist will monitor excavation and require work to stop if any burials or archaeological resources are uncovered.

**E. Park and Nearshore Recreational Use**

Removal of most of the structures and landscaping of house lot area and Camp Kailua to blend into the rest of the beach park will increase the park area suitable for picnicking and free play. The net effect will be to redistribute crowds rather than to increase use of Kailua Beach Park.

**F. Beach Processes**

The proposed action will not have any impact on beach processes.

**G. Construction Activities**

Impacts (noise, dust, traffic) directly related to maintenance activities may cause temporary inconveniences for park users and nearby residents. In-house staff and contractors are expected to abide by Department of Health regulations on noise and air pollution.

Protective barriers and signs will be provided around affected park areas to caution the public of construction activities.

**V. ALTERNATIVES CONSIDERED**

Other than implementation of the proposed action, the only alternative available is "no action." This alternative is not acceptable for the following reasons:

- A. Status quo maintenance without a program for improvements will result in deterioration of the park grounds and continued deterioration of the park pavilion which will be a health and safety problem.

- B. The former private houses and ancillary structures will remain an eyesore, a haven for illicit activities and this area will continue to be a dumping ground for trash. Moreover, the City and County of Honolulu will continue to be exposed to a high liability risk if these dilapidated structures and abandoned vehicles aren't removed.
- C. Six unsightly sanitois located in the parking lot mauka of the park pavilion and a six-foot high chain link fence surrounding the pavilion will have to remain until such time that pavilion renovations are completed.
- D. At present, there is only one water source which serves both irrigation and domestic water needs of the park pavilion and surrounding area. To prevent a potential health hazard, a new lateral is required. This will separate the potable and nonpotable water systems.
- E. Accepting the "no action" alternative is contradictory to the shoreline management law which was enacted for the purpose of preserving, protecting and restoring the natural resources of the coastal zone.

#### VI. DETERMINATION

Based on the foregoing assessment, the DPR has determined that implementation of maintenance-type projects will not have any detrimental impact on the environment. In fact, the proposed actions will enhance the environment by: (1) ridding the area of blight, (2) reopening the park pavilion and eliminating the need for six unsightly sanitois and security fencing, (3) creating more open space and coastal views, (4) removing a potential health hazard by separating the potable and nonpotable water system, and (5) upgrading the landscape by providing renovated and upgraded sprinkler systems.

#### VII. AGENCIES CONSULTED

Maintenance-type projects do not require consultation with other agencies. These projects are specifically exempt actions.

EXHIBIT A

Blight: Dilapidated Houses Adjacent to Camp Kailua

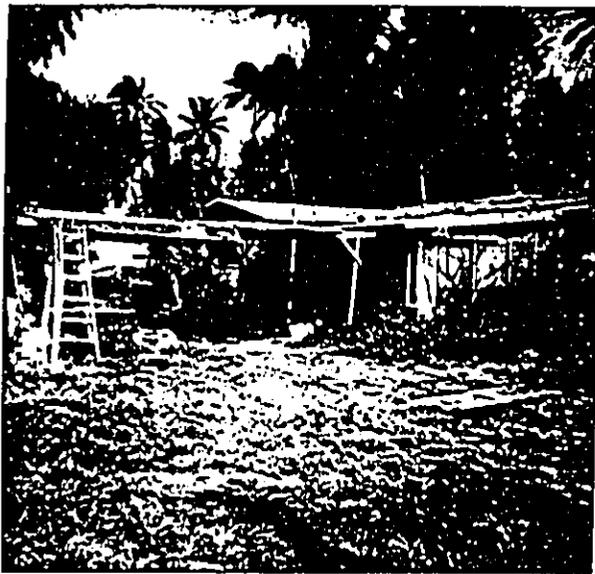
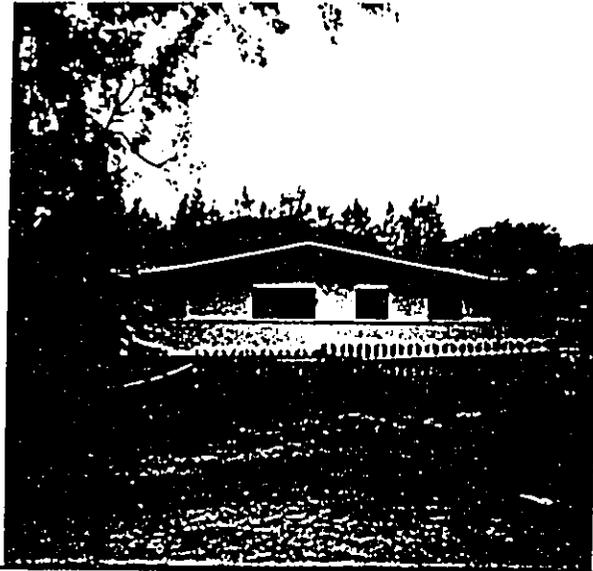


EXHIBIT B

Blight: Abandoned Vehicles and Accumulation of Trash

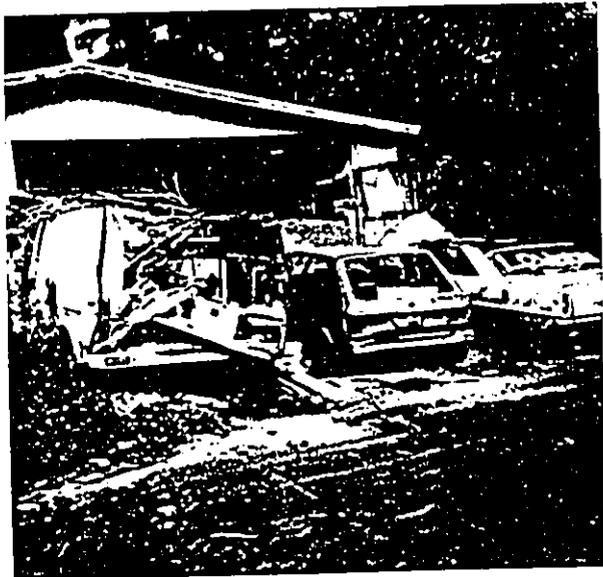
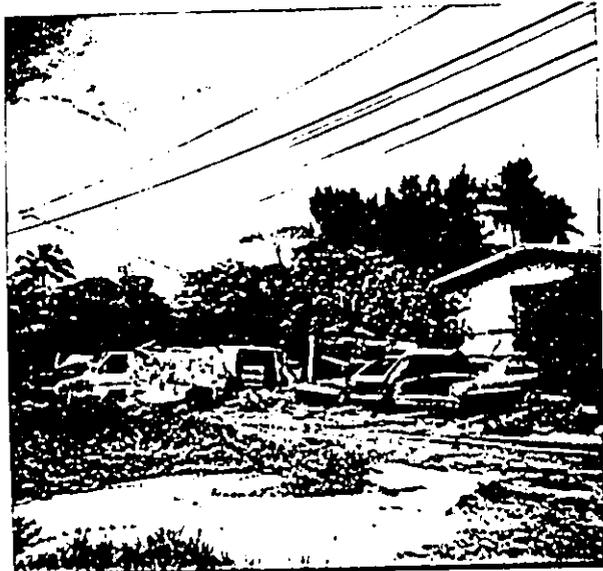
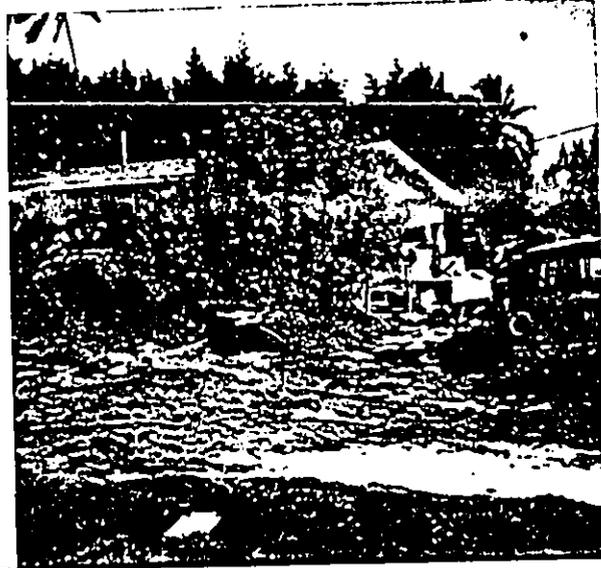
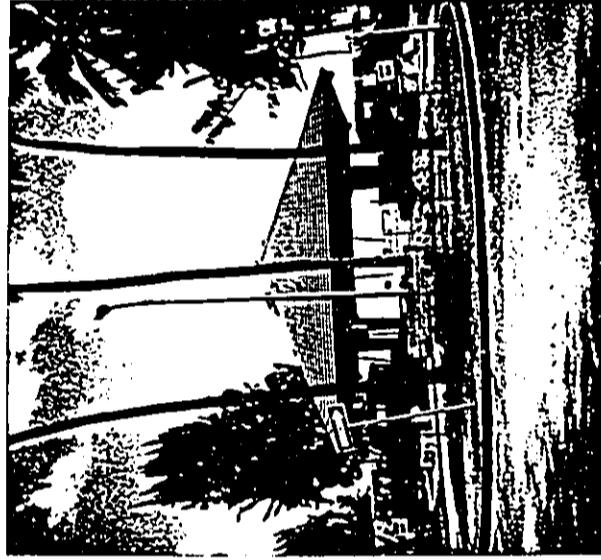


EXHIBIT C

Park Pavilion and Surrounding Area (4/1/92)  
(Sanitosis and Fencing)



Note: Structural condition cannot be seen through these photocopies

APPENDIX C

KAILUA BEACH PARK PARKING SURVEY  
SUNDAY, MAY 26, 1991 (11 A.M. TO 2 P.M.)

NOTES FOR KAILUA BEACH PARK PARKING SURVEY

- (a) The pavilion parking lot has two stalls reserved for the concession, two stalls reserved for the lifeguards, and two stalls reserved for the handicapped.
- (b) Some stream bank parking spaces were still available at noon, but by 1 p.m. all spaces were packed.
- (c) The Kawaihoa parking lot has one stall reserved for the handicapped.
- (d) The peak vehicle count included cars parked within the park on the grass between the Kawaihoa parking lot and the Kawaihoa Road right-of-way.
- (e) Most vehicles in the house lot area appeared to belong to former occupants.
- (f) The gate to the Camp Kailua parking lot was closed but unlocked, which discouraged public use.
- (g) Sand covered half the marked stalls in the Alala parking lot.
- (h) Only trailers and vehicles attached to trailers were supposed to be parked on weekends in the boat trailer parking area.
- (i) Most vehicles parked makai of Kaneapu Place appeared to belong to Kaneapu Place residents. Steep slopes and distance from the ocean discourage public use of Kaneapu Place parking.
- (j) Distance from the ocean discourages public use of the Alala Point gravel parking area.
- (k) Of the 241 marked vehicle parking stalls at Kailua Beach Park, two are reserved for the concession, two are reserved for the lifeguards, and three are reserved for the handicapped.
- (l) Of the estimated 516 maximum legal vehicle parking spaces at Kailua Beach Park, two are reserved for the concession, two are reserved for the lifeguards, three are reserved for the handicapped, and 34 are reserved on weekends for vehicles with trailers attached.
- (m) The number of vehicles parked at the Lanikai end of Kawaihoa Road was still increasing at 2 p.m.

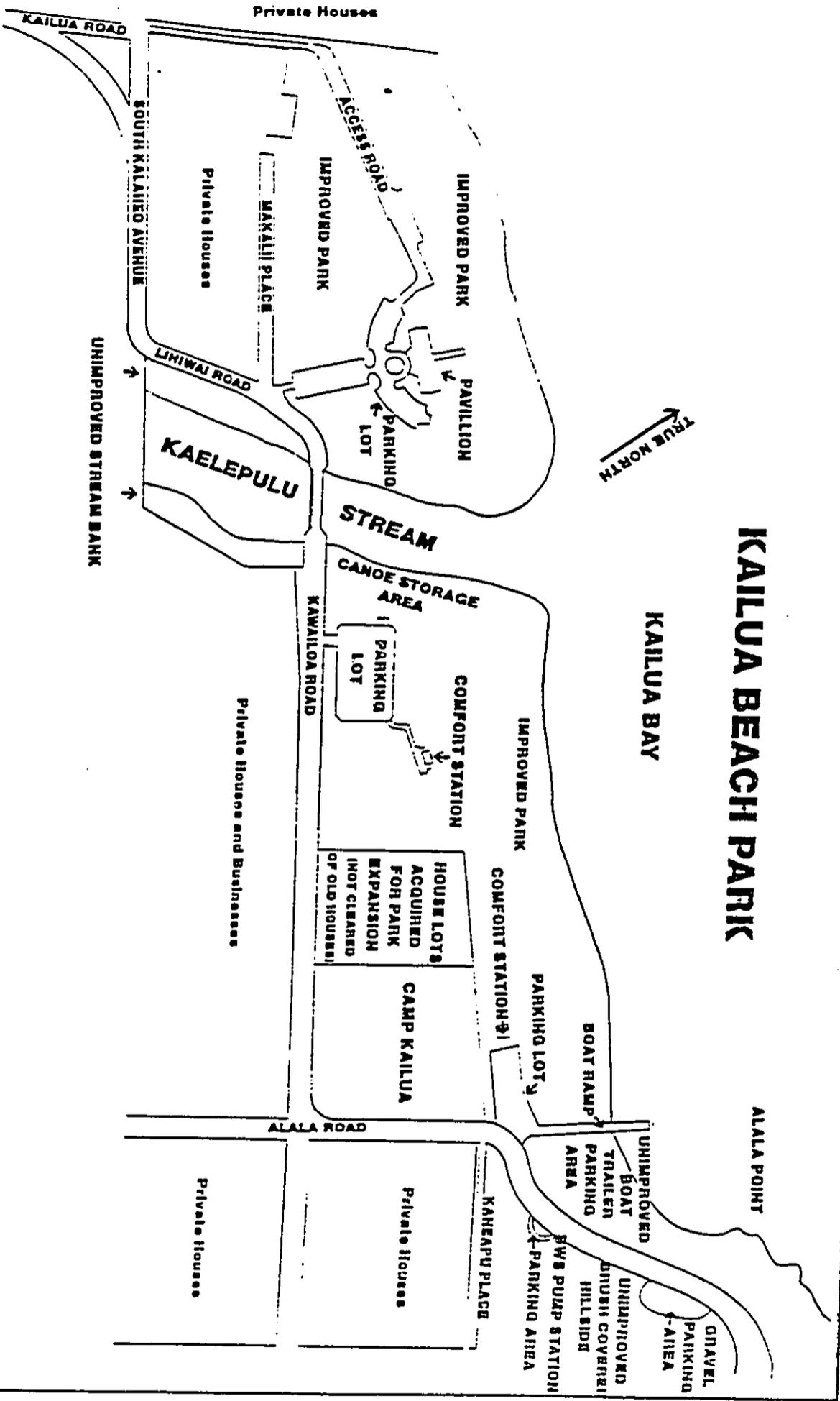
KAILUA BEACH PARK PARKING SURVEY  
 Sunday, May 26, 1991 (11 a.m. to 2 p.m.)

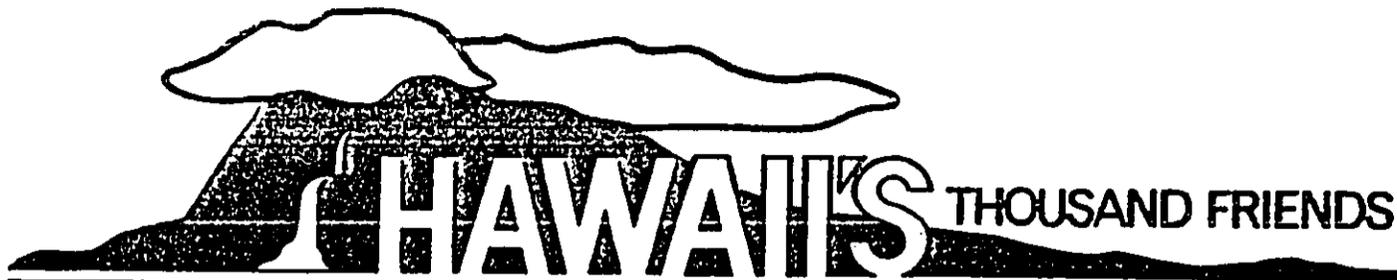
<u>Park Parking Area</u>	<u>Marked Parking Stalls</u>	<u>Estimated Maximum Legal Vehicle Parking Spaces</u>	<u>Actual Peak Parking</u>
Pavilion Access Road	15	72	83 vehicles
Pavilion Parking Lot	80 (a)	80 (a)	85 vehicles
Stream Bank Mauka of Bridge, Kailua Side	None	62 (b)	53 vehicles 2 trailers 7 canoes
Stream Bank Mauka of Bridge, Lanikai Side	None	45 (b)	45 vehicles
Kawaiiloa Canoe Storage Area	None	None	14 canoes
Kawaiiloa Parking Lot	86 (c)	86 (c)	129 vehicles (d)
House Lots, Kailua Side of Camp Kailua	None	None	10 vehicles (e)
Camp Kailua Parking Lot	40	40	2 vehicles (f)
Alala Parking Lot	20 (g)	40	51 vehicles
Boat Trailer Parking Area	None	34 vehicles (h) 34 trailers	54 vehicles 14 trailers
Kaneapu Place, Makai Side	None	20	10 vehicles (i)
BWS Pump Station Parking Area	None	6	6 vehicles
Alala Point Gravel Parking Area	None	20 (j)	1 vehicle 1 trailer
<b>Subtotal Park Parking</b>	<b>241 (k)</b>	<b>516 vehicles (l) 34 trailers</b>	<b>529 vehicles 16 trailers 21 canoes</b>
<hr/>			
<u>Street Parking</u>			
Makalii Place, Makai Side	None	20	20 vehicles
Kawaiiloa Road	None	70	87 vehicles (m)
<b>Subtotal Street Parking Abutting Park</b>	<b>None</b>	<b>90</b>	<b>107 vehicles</b>
<b>Total Parking within and Abutting Kailua Beach Park</b>	<b>241 (k)</b>	<b>606 vehicles (l) 34 trailers</b>	<b>636 vehicles (m) 16 trailers 21 canoes</b>

See notes (a) through (m) on attached page.

# KAILUA BEACH PARK

KAILUA BAY





**Ke aloha o ko kākou 'āina, 'Oia ka mana kū pā'a. Pānoanoa ka 'āina, Mānoanoa ka po'a.**  
**The Love of our land, is the power for us to stand fast. Rare is the land, many are the people.**

TO: Walter Ozawa, Director  
Department of Parks and Recreation  
650 South King Street  
Honolulu, Hawaii 96813

FROM: Donna Wong *DW*  
Executive Director

DATE: August 20, 1992

RE: Environmental Assessment for Maintenance-Type  
Improvements at Kailua Beach Park, Koolau-poko, Oahu,  
Hawaii

The Court has ruled that implementation of the Kailua Beach Park Master Plan requires a SMP and that implementation of that plan can not be fragmented.

Labeling the itemized projects in this EA as "MAINTENANCE-TYPE IMPROVEMENTS" is an attempt to evade the issue of fragmentation within the Coastal Zone. According to this EA each project is considered independently, there is no plan, there is no continuity.

The 1992 EA neglects to address the following items that were listed in the 1991 EA: creation of a bike path, reconfiguration of the parking lot, new boat ramp and new extended parking at the Camp Kailua area. Does the absence of these items in the 1992 EA mean they have been dropped from the Master Plan and will not be implemented?

The EA process requires that "potential problems must be identified and appropriate mitigation described in general terms" yet no potential problems are either acknowledged or listed. The "sum of the effects, the "potential problems", and "appropriate mitigation" measures have not been discussed.

This EA is a waste of tax payers money, a act of futility since a 1991 EA was done and the assertion that only "maintenance" is proposed is absurd. Why it was done is a mystery.

305 Hahani St., Suite 282 • Kailua, HI 96734 • (808) 262-0682

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Our specific comments are as follows:

Pg. 1 #3

The EA is deficient in not providing a blueprint of the "several sections of deteriorated exterior walls" that will be replaced and the work involved in providing "more openings in exterior walls". Without such information it is impossible to respond to the impacts of the work. The EA is negligent in not providing length dimensions of the "new four-inch water lateral" and the amount of earth moving the job will required.

The use of heavy equipment, necessary to demolish and remove structural materials plus do extensive digging and grading for the water lines, poses a threat to the coastal environment. What mitigation precautions will be used? A map of the water lines should be provided.

Pg. 1 #4

We are unable to provide precise comments because dimensions, drawings, figures etc. on the "upgrading and/or replacing" of irrigation lines and sprinklers were not provided in the EA.

Since the irrigation lines and sprinklers will cover the entire park and "all landscaped areas" we are concerned about the impact the heavy equipment will have on the environment. What mitigation precautions will be used? A map of the irrigation lines and sprinklers should be provided.

Please provide information of when the irrigation lines, sprinklers and water lines were put in. We have been informed that some type of piping was recently put in. Please explain what the pipe is for, where it is located and when was it put in. Is this the piping to be upgraded and/or replaced?

Pg. 2 #3

In the final EA please include the methodology and reasoning used in determining that "Camp Kailua is not the most desirable location for this type of activity." What rational and process was used to reach your determination that "Cabin camping should be provided in a wilderness or other suitable environment which isolated from urbanization"?

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Were social welfare, drug rehabilitation, child care, health care, social and community organizations approached for their input into what best would service their needs? It is common knowledge that the ocean is very therapeutic. It is also common knowledge that sanctuaries are most needed in or close to urban centers to allow for relief of the stress of the urban life. Camp Kailua provides this relief since it is an oasis within an urban setting.

It is ironic that the Department "will look into the feasibility of providing cabin camping facilities" at Waimanalo Bay State Park since this park now has the unobstructed open space that this Department so urgently is seeking for Kailua Beach Park. What is the rational and financial justification of destroying existing ocean camping facilities at Camp Kailua to only move down the coast a few miles to build camping facilities, at great cost to the taxpayers, in an unobstructed park? Explain the rational, cost, and purpose of destroying existing facilities to only turn around and build some place else. This section confirms the suspicion that orders are to destroy Camp Kailua at all costs.

### Pg. 2 C Economic Characteristics

The cost of replacing irrigation lines and sprinklers is missing. Construction and materials costs are missing. Consultant and architect costs are missing. Does the \$338,000 include "waterproof material" for the roof, "interior plumbing fixtures", and special fixtures necessary for handicapped accessibility? What is the total and final cost of landscaping? A comprehensive break down of costs is needed.

### Pg. 3

We disagree with your persistence in calling the massive amount of work you want to do "routine maintenance".

"Stream dredging" and "maintenance and interior alterations of existing structures" qualify as "maintenance" but the characterization of "demolition or removal of structures" and "installation of underground utility lines..." as "routine maintenance" is absurd.

Besides the demolition and removal of the 7 condemned houses & ancillary structures, work consists of demolition and removal of 6 structures at Camp Kailua. The demolition requires heavy equipment to remove concrete foundations, roads, parking areas and do massive grading. This activity will have an impact on the coastal areas. What mitigation precautions will be used?

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### Pg. D Water Quality

We strongly disagree with your determination that "Ocean water quality offshore of Kailua Beach Park is excellent." Pollution and water quality of Kailua Bay has, for years, been a major concern.

Over the years the water quality has deteriorated and divers confirm that coral in the bay is either dead, dying or immersed in silt. Water health standards have been breached many times and bacteria counts have exceeded the acceptable limits. Kailua beach has been posted and closed many times due to high bacterial counts.

"Because of the nature of inland runoff and poor circulation, the Kaelepulu Stream estuary often naturally contains too much coliform bacteria to meet State water quality standards" and the fact that the Kaelepulu stream-mouth is opened "whenever it rains" exposes swimmers to the coliform bacteria as it flows from the stream into the open ocean. This is a unhealthy situation. What, if any, are the plans to rectify this situation?

### Pg. 6-G Historic Sites and Archaeological Resources

What are the precautions the department, contractors and sub-contractors will take should sites or burials be found?

### Pg. 6-H. Coastal Views

The EA neglects to add that the primary obstruction of ocean views is the natural sand dunes. While the configuration of the sand dunes may change with time their existence is always constant. It is imperative that the sand dunes remain in place and not be flattened because they provide a wind and sand buffer for the street, houses and people using the beach.

### Pg. 7-I Park and Nearshore Recreational Uses

Since the ocean fronting Camp Kailua lies within the 275 feet from the boat ramp closed to swimmers and only open to vessels and windsurfers it seems logical that the new cleared area will be used mostly by windsurfers and all types of vessels. Are there any plans to open this area to swimming?

### Pg. 8-K Parking and Traffic

Our copy of the EA did not contain Appendix C therefore we are unable to present comments on the traffic count. We would like to see both Appendix C and a diagram of "streets abutting Kailua Beach Park" which "have ample capacity to accommodate both peak weekday and peak weekend traffic."

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We also request a copy of any traffic counts, the days the counts were taken plus specifics of the "visual observation", such as who did the "visual observation", how many days, dates and times of observations and how conclusion was reached. Were the neighborhoods surveyed to find out any inconveniences, problems or concerns they might have regarding the beach parking.

Pg. 8-SUMMARY OF IMPACTS AND MITIGATION MEASURES (POSITIVE, NEGATIVE OR NO IMPACT)

### B. Drainage and Water Quality

What studies and tests have been conducted to support the theory that runoff will be reduced once structures are removed and areas landscaped? We request copies of these studies/tests.

No where in the EA is the amount or design of landscaping discussed. This is a major omission.

### C. Hazards, Nuisances and Aesthetics

The reason the "former private houses and ancillary structures are now an eyesore" is because the City evicted the people living in the houses before all the approvals for implementation of the Kailua Beach Park Master Plan were in place. Thus the area was left unattended. When the City became the landowner it became the City's responsibility to maintain the area.

Are there any plans to flatten, level, remove, re-contour the sand dunes fronting Camp Kailua and the housing area?

### Pg. 9-F-Beach Processes

What is the "proposed action" that "will not have any impact on beach processes"? What is meant by "beach processes"?

### Pg. 9-G Construction Activities

The EA does not show the construction hours or the length of any project. How many parking spaces will be lost to use by equipment during construction?

Please provide a complete schedule of days and times of beach closures during all phases of construction.

### Pg. 9-V Alternatives Considered

A. To say that park grounds and the pavilion will deteriorate for lack of a "program for improvements is ludicrous. Everyone can, if they so desire, maintain property and structures without having an "improvement program".

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B. We again stress that the City moved the tenants out before all the permits were in place thus the City has allowed, through the housing area, through its lack of maintenance, to become an "eyesore". The City by its sheer neglect is "exposing" itself to "high liability".

C. Again, the City began demolition of the park pavilion in direct defiance of the Courts order not to do any work within Kailua Beach Park. Now the City is saying the sanitois and six-foot height chain link fence are unsightly. These items would not be there if the City had not disobeyed court orders and begun demolition of the pavilion.

E. An explanation of how the conclusion, "no action" alternative is contradictory to the shoreline management law...", was reached is needed. This is an interesting statement because a few months ago, before Hawaii's Thousand Friends took the City to court for failure to obtain an SMP before implementing the Kailua Beach Park Master Plan, the City argued that what was proposed for Kailua Beach and Camp Kailua would have no adverse effects on the coastal zone thus an SMP was not necessary.

### Pg. 10 Agencies Consulted

We strongly disagree with your conclusion that since this is only a "Maintenance-type" project consultation from other agencies is not required.

As defined in Websters dictionary, maintenance is: "the upkeep of property or equipment" and demolition is: "tear down, raze" "break in pieces", "do away with".

What is projected in this EA is a hodge podge of maintenance and demolition projects. It appears to be another attempt to circumvent CZM laws.

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This EA presents a hodge podge of maintenance and demolition projects and appears to be, yet, another attempt to circumvent the mandate of Coastal Zone Management Act.

CC: OEQC  
Senator Mary George  
Representative Jackie Young  
Representative Cynthia Thielen  
Councilman Steve Holmes  
Doug Tom, Coastal Zone Management  
Masi Okasaki, Director of Pacific Region  
Kailua Neighborhood Board

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DPR/ADVANCE PLANNING

October 21, 1992

Mrs. Donna Wong  
Executive Director  
Hawaii's Thousand Friends  
305 Hahani Street, Suite 282  
Kailua, Hawaii 96734

Dear Mrs. Wong:

Subject: Environmental Assessment (EA) for Maintenance-Type  
Improvements at Kailua Beach Park

Thank you for your comments on the environmental assessment for maintenance actions at Kailua Beach Park. We provide the following in response to your comments.

1. At this time, the Department of Parks and Recreation (DPR) is only proposing to clear certain areas of the park of blight, provide health and safety improvements for the enjoyment of park users, create more open space and improve the general landscape of the park. In the future, if other improvements are desired, separate environmental assessments and special management permit applications will be prepared.
2. All construction activities, whether inland or near the shoreline, are regulated by various City and State laws and rules and regulations.

Areas of the park which might be affected by the use of heavy equipment will be restored to its original or improved condition within a reasonable time.

OCT 22 1992

Mrs. Donna Wong  
Page 2  
October 21, 1992

3. Construction drawings for the pavilion renovations and new water line are available for your review at the Department of Parks and Recreation, 650 South King Street, 9th floor.

Plans are now being prepared for upgrading the existing irrigation system throughout the park. The existing system is obsolete and poses a potential health risk if not upgraded. New lines with backflow prevention valves will have to be installed.

The type of equipment to be used for trenching irrigation lines is undetermined. As mentioned in the EA (Page 8, Section IV.B), after the new irrigation lines are installed, trenches will be immediately covered and grassed.

4. The DPR is aware of existing social problems on Oahu. However, the function of the DPR is to provide, without discrimination, open space and recreation/leisure time facilities and activities for all the people of Oahu.
5. The determination that water quality offshore of Kailua Beach Park is excellent is based on the State's Department of Health (Chapter 11-54, Water Quality Standards) classification of Kailua Bay waters.

The DPR is aware that during periods of heavy rainfall, the Kaelepulu Stream estuary often contains high levels of coliform bacteria due to inland runoff and poor circulation. The DPR is not responsible for monitoring these waters nor is it responsible for preventing nonpoint source pollutants.

6. The Department of Land and Natural Resources (DLNR) is in favor with the proposed actions (see attached letter dated September 23, 1991). Moreover, DLNR is satisfied that an archaeological impact mitigation plan, if required, will be prepared after consultation with the State Historic Preservation Officer. The EA also indicated that, if necessary, an archaeologist will be contracted to monitor excavation activities.
7. Existing sand dunes will not be affected by the proposed actions.

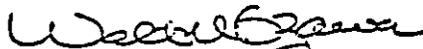
Mrs. Donna Wong  
Page 3  
October 21, 1992

8. Near shore waters are under the jurisdiction of the State's Department of Transportation. Swimming area restrictions are imposed by this agency and not DPR.
9. Attached for your review is Appendix C (Parking Survey).
10. Cabin camping facilities should be provided in a spacious, isolated environment distant from urbanization. This will allow campers to enjoy the gifts of nature, have freedom of movement and experience solitude. Moreover, having facilities too close to urban areas would require DPR to place restrictions on noise-generating activities during the late evening hours. Smoke from cookouts would also be a nuisance to nearby residents.
11. The DPR has determined that the former Camp Kailua site is not suitable for cabin camping activities. Therefore, your request for cost estimates for renovating structures is irrelevant to this EA and the upcoming SMA application.

Provision of cabin camping facilities for Oahu's people would be a new undertaking for the DPR. We are now in the process of preparing guidelines for site and facility requirements related to cabin camping. Until these guidelines are completed, we will not be able to provide you with cost estimates.

Thank you for the opportunity to address your concerns.

Sincerely,



WALTER M. OZAWA, Director

WMO:ei

Attachments

bcc: Paula Loomis, Managing Director's Office  
Roland Libby, Department of General Planning  
Department of Land Utilization  
Corporation Counsel  
Executive Services

JOHN WAIHEE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

P. O. BOX 621  
HONOLULU, HAWAII 96809

WILLIAM W. PATY, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES

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PROGRAM  
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STATE PARKS  
WATER AND LAND DEVELOPMENT

REF:OCEA:SKK

FILE NO.: 92-130  
DOC. NO.: 1680E

SEP 23 1991

The Honorable Walter M. Ozawa  
Director  
Department of Parks and Recreation  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Ozawa *W. Kochi*

Subject: Environmental Assessment/Negative Declaration for the  
Construction of Master Planned Improvements at Kailua  
Beach Park

Thank you for your cooperation in this matter. We have reviewed  
the materials your submitted and have the following comments.

Brief Description:

The City and County of Honolulu, Department of Parks and Recreation  
proposes to implement the updated Kailua Beach Park Master Plan.  
Kailua Beach Park abuts the shoreline of Kailua Bay between Kailua  
Road and Alala Point, bisected by Kaelepulu Stream. The park  
includes both stream banks mauka of Kawailoa Road.

Most of the buildings at Camp Kailua will be demolished and  
extensive improvements and landscaping of the park is planned to  
increase the suitability for picnicking and other public  
recreational activities.

FD/146

LS

Mr. W. Ozawa

-2-

File No.: 92-130

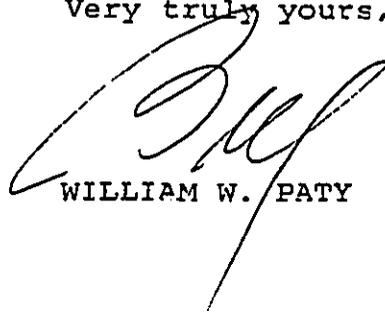
AQUATIC RESOURCES COMMENTS:

No significant impact to aquatic resource values is expected from the activities proposed. However, precautions should be taken, especially for landscaping activities seaward of the shoreline setback, and preventing demolition debris, eroded soils, petroleum products, landscaping chemicals/fertilizers and other potential contaminants from entering Kailua Bay.

Our Department's State Parks Division supports the County's efforts to expand Kailua Beach Park.

Thank you for your cooperation in this matter. Please feel free to call me or Sam Lemmo at our Office of Conservation and Environmental Affairs, at 548-7837, should you have any questions.

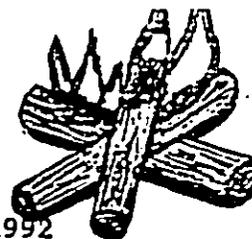
Very truly yours,



WILLIAM W. PATY

**CITIZENS FOR CAMP KAILUA**

150 Hamakua Drive, Suite 793  
Kailua, HI 96734



August 20, 1992

To:

DEPARTMENT OF PARKS AND RECREATION  
City and County of Honolulu  
650 S. King Street  
Honolulu, Hawaii 96813

From:

CITIZENS FOR CAMP KAILUA  
150 Hamakua Dr, Suite 793  
Kailua, HI 96734

Subject:

**RESPONSE TO THE ENVIRONMENTAL ASSESSMENT FOR  
KAILUA BEACH PARK - MAINTENANCE TYPE IMPROVEMENTS**

~~In view of the court decisions of the past year, we find the~~  
Environmental Assessment for "Maintenance Type Improvements", hereinafter  
referred to as "EA/MTI", rather astonishing.

If the contemplated activities described in the EA/MTI fell under  
"maintenance-type action" as you contend, and required no major Special  
Management Area Use Permit (SMP), why would you waste taxpayers' money  
processing an SMP? Your logic makes no sense.

Paragraph 3, line 8, of Section II. APPLICABLE LAND USE PLANS,  
POLICIES AND CONTROL, reads:

"These activities are exempt unless any of these actions are or  
might become a part of a larger project which might have significant  
environmental impacts. It is the department's opinion that even  
taken collectively, there will be no significant environmental  
impacts, therefore, all the actions should be exempt. The courts  
disagree, hence, the department is processing this major SMP".

You are, however, not processing a major SMP as specified by the  
courts! Much to the contrary, you are trying to extract from the major  
SMP ordered by the courts some of the very actions which prompted the  
recourse to the courts! The court examined the actions you described  
under the EA/MTI and determined that they could not stand alone, but were  
part of a larger project. The court made it unmistakably clear what it  
thought about your department's opinion on the matter. Last November, the  
court specifically ruled that the actions you contend are maintenance  
type improvements and described in the EA/MTI could not be segmented and  
exempted from a major SMP issued by the City Council. The court  
reaffirmed its decision in January and again in March of this year.

G 755  
8/24

In sum, your EA/MTI is yet another dishonest, and clumsy, attempt to segment the project in order to evade the law and a court order.

We disagree with your interpretation of what constitutes maintenance and repair. However, since the court has ruled that the actions listed under the EA/MTI, whether they may or may not be maintenance, repair or demolition type actions, are part of the larger project and subject to a major SMP issued by the City Council, we shall not waste our time arguing your contention here.

We shall, however, comment on some of your sub-sections and conclusions, especially as they relate to Camp Kailua, and reiterate our objections to your no-adverse impact determination as we did in our response to the July 24, 1991 EA.

A. TECHNICAL CHARACTERISTICS

It is impossible to evaluate the impact of the proposed actions without having seen the full details of what you are proposing to do. To this date, no one, including the City Council, has seen a detailed plan, with accompanying text, of the Kailua Beach Park Master plan project of which the actions under EA/MTI are a part. A detailed plan must be made available to the City Council and the public before any final determination on any part of the Kailua Beach Park Master Plan can be made.

B. SOCIAL/RECREATION CHARACTERISTICS

We agree that beach parks are recreation resources that are for islandwide use. The law, however, requires that you provide equal recreational resources for all, including subgroups of the population, such as the elderly and the physically and mentally challenged. The recently passed Bill 8 recognizes the need and establishes the policy of the City and County to provide cabin camping, both oceanside and inland.

We disagree with your determination that Camp Kailua is not the most desirable location for this type of activity and that it should be provided in a wilderness or environment isolated from urban centers.

Kailua Beach, as you have pointed out again and again, is one of the safest beaches on the island. As you stated, a sandy bottom extends far offshore allowing excellent conditions for wading and swimming. In other words, it provides the safest ocean wading and swimming for weaker swimmers, such as the elderly and the handicapped, anywhere on the island. These conditions are not matched by the waters at Waimanalo Bay State Park nor at Kaiaka Bay.

Part of the great success of the cabin camping program at Camp

Kailua, aside from the safe ocean swimming and physical layout, was its proximity to the urban center. Its closeness to nursing homes, and to the social agencies serving the aged and the handicapped, helped make the ocean cabin camping experience possible. As shown in our interviews with nursing home staff, the proximity to the urban center made the transportation manageable and without extra expenses. Also, the proximity to medical facilities is a reassuring factor. Attached for your information is a published letter to the editor on the subject.

As we learned in additional interviews with social service agencies serving the aged and the physically and mentally handicapped, the closing of Camp Kailua has deprived these special groups of citizens of a beneficial experience and abridged their rights under the equal access laws. A great deal of thought and concern, in the EA of July 1991 and again in the present EA/MTI, are devoted to the needs of windsurfers, canoers, and the able-bodied swimmers and beach goers. No concern, whatsoever, is expressed for the needs of the aged and the handicapped who represent 23 percent of our population. We are an aging population. Demographic statistics show that the population 65 and over is growing at a much faster rate than any other segment of our population. Also increasing is the population with disabilities.

~~Camp Kailua is the only facility that provides an oceanside camping~~ experience for those subgroups of our population who because of age or physical or mental impairments are unable to participate in oceanside tent camping. The closing of the camp and proposed demolition not only abridges the recreational rights of a large segment of our population but has a serious social impact. It is inconceivable how you could have arrived at a no-adverse impact determination and we question the methods used to arrive at your conclusion.

Camp Kailua has been part of Kailua Beach Park since its acquisition and its retention does not contradict the original intent of creating a contiguous stretch of beach park. Moreover, present and future needs should be the guiding force on how to utilize our old and new beach parks. As you have agreed in the past, the Kailua Beach Park Master Plan must be a "living" instrument. As such, it must serve the needs of the living and not stubbornly adhere to obsolete ideas of the past - no matter how relevant those ideas may have decades ago, and no matter how dear they may still be to some of our present government bureaucrats.

#### ECONOMICS, PUBLIC HEALTH, AND CULTURAL AND SOCIAL WELFARE

While the social impact evaluation received inadequate study in your EA/MTI, the evaluation of economic, public health and cultural impacts was completely omitted.

Not only compassion and human decency, but also the law requires

that we provide oceanside cabin camping facilities for some subgroups of our community. Why then should taxpayers pay to demolish a facility that is legally required, that is so ideally located and that has served the needs of the community so well? Why should we pay to rebuild such a facility at a less adequate location? The demolition of Camp Kailua makes no social, legal or fiscal sense. It would be a waste of taxpayers' money.

The monetary saving of restoring Camp Kailua versus eventually building a required facility at a less suitable location is more or less calculable. More difficult to assess is the saving in dollars emanating from the many, and at the present lost, preventive and rehabilitative programs carried out by our social service agencies, youth, church and community groups in the healing environment of Camp Kailua. These savings, be they through alcohol, drug prevention and rehab programs, abused spouses, and many other positive social programs are indeed of inestimable human, social and economic value. Camp Kailua is not simply a cabin camping facility, It is an important social resource that contributes to human dignity, and to the health and welfare of our island people.

The demolition of Camp Kailua would significantly curtail the range of beneficial uses of the environment. The present use of the site enables a successful combination of recreation, education, rehabilitation and positive social programs in a healing natural Hawaiian ocean environment. It is the best possible use of that environment, far more beneficial to our social welfare than your proposed plan.

The demolition of Camp Kailua would also bring about the irrevocable loss of significant natural and cultural resource. Camp Kailua represents a vestige of old Hawaii, a natural gathering place conducive to ohana and good feeling not easily found elsewhere. The thousands of people who have stayed at Camp Kailua over the years carry with them Hawaiian memories that future generations should also be able to cherish one day. Where is your sense of culture and history? Why the stubborn attempts to "streamline" our parks and our recreation?

D. WATER QUALITY

We disagree with your finding that the ocean water quality offshore of Kailua Beach Park is excellent. Those of us who have lived here all or most of our lives have seen a rapid decline in the water quality, especially over the past few years. Many of us, as a result of numerous infections, no longer allow our children and visitors to swim in Kailua Bay. The repeated findings that the water quality does not meet the standards of the Clean Water Act also repudiate your claim.

H. COASTAL VIEWS

Your contention that the proposed removal of buildings at Camp Kailua would afford new coastal views from Kawaihoa Road and Alala Road is incorrect. If "coastal view" implies "ocean view", no significant new ocean view is gained. You propose to leave the L-shaped dormitory building and the "fale" structure. The roofs of these two structures would continue to obstruct any possible ocean view gained by the demolition of other buildings. However, even if these two structures were demolished, no more significant views than already exist would be gained, except by the removal of trees and complete elimination of the natural dune crests and the fence that now protect Camp Kailua from the windblown sand. The view, if the proposed picnic area projected for Camp Kailua were to be protected from the windblown sand, would be comparable to the present ocean views from Kawaihoa Road across the Kawaihoa parking lot. In sum, no significant ocean views would be gained by the demolition of Camp Kailua unless the area was denuded and the sand allowed to blow across the site to Kawaihoa Road.

#### I. PARK AND NEARSHORE RECREATIONAL USES

You have repeatedly and unfairly chastized the Kailua community and reminded it that the Kailua Beach Park is not a community park but must be shared with the whole island. At one point, you referred to it as a "regional park". You accused the users of Camp Kailua as being exclusive, special interest groups. You cited the results of a survey that showed a demand for more picnic tables as the justification for demolishing Camp Kailua in order to make the site available to greater numbers of people. A review of past records show your repeated statements about the necessity to create more open space at Kailua Beach Park in order to accommodate the increased demand for beach type activities. On a number of occasions, you acknowledged the partial loss of Hanauma Bay to local people and tour buses and the concomitant increase in demand for the use of Kailua Beach Park.

In your EA/MTI, however, you portray the demolition of Camp Kailua, and the clearing of the house lot area adjacent to it, as nothing more than a way to "redistribute the present crowds". This seriously contradicts your earlier contention that it is a means to accommodate greater numbers of beachgoers. The increased demand for the use of Kailua Beach Park due to the loss of Hanauma Bay, as well as other factors, is apparent from the increased number of tour buses that park at Kailua Beach Park, but also from increased use by people from other parts of the island. You failed to look at the impacts on the coastal environment of the expansion of the park and changes in use. According to your own past statements, these changes would entail more intense use. The statistics that you used, those you chose to omit, the absence of other pertinent information, and your attempts to cover up the greater anticipated use of the beach park are deceitful. Your assessment of impacts on the fragile coastal zone environment is faulty and dishonest.

#### V. ALTERNATIVES CONSIDERED

We disagree that the only alternative to the proposed plan of action is the "no action" scenario that you described. The lawful and moral alternative is the action ordered by the court.

You failed to act according to a court order. You brought about a "no action" situation by willfully ignoring environmental laws and violating a court order. You have closed Camp Kailua, thereby violating the law and abridging the recreational rights of citizens for whom the need for an uplifting recreational experience is greatest. You vandalized the camp, relegated taxpayers property to purposeful neglect, and recklessly exposed the site to liability risks. Rather than abiding by a court order requiring that you obtain a major SMP from the City Council for all the actions under the whole Kailua Beach Park Master Plan, you took the law into your own hands. You gutted the Kailua Beach Park pavilion and then viciously attacked community groups for their act of asking that you uphold the law and abide by the court order. Although the court allowed you to complete the renovation of the bathrooms while applying for an SMP for the City Council, you took no action for months. Rather than acting in the public interest, and in accordance with the court order, you chose to appeal the court decision to a higher court thereby prolonging the undesirable situation. In sum, you have willfully created delapidated conditions in the hope that people would tire of "no action" and surrender to your plans out of exasperation. To try to achieve your own agenda by attempts to divide and conquer the community with the use of lies and deception is morally reprehensible.

#### VI. DETERMINATION

We disagree with your determination that your proposed actions are the only way to enhance the environment at Kailua Beach Park. Our determination is that taking action according to the rulings of the Circuit Court will bring about the results demanded by the law and desired by the people. You already have the go-ahead from the court to finish the bathrooms and get rid of the sanitois. Why the dillydallying? The immediate application to the City Council for a major SMP, the evaluation by that body of all cumulative impacts, and the issuance of the required permit will allow the clearing up of the blight in the area and permit the speedy proceeding with all facets of the Kailua Beach Park Master Plan in accordance with all applicable laws.

By your failure to apply to the City Council for a major SMP in a timely manner in accordance with the order of the court, and by your lawlessness of gutting the pavilion, you have created a distressful situation at Kailua Beach Park. This distress should not be used to justify further violations of the law, and of a court

order, by your attempts in the EA/MTI to exempt major portions of the Kailua Beach Park Master Plan from the requirement of an SMP issued by the City Council.

Our final determination is that you are continuing to act in a manner contradictory to the shoreline management law which was enacted for the purpose of preserving, protecting and restoring the natural resources of the coastal zone. We cannot help but to add that your EA/MTI has further eroded our trust in your department and City administration.

We request that the EA/MTI be filed and that no work be done on any portion of the Kailua Beach Park Master Plan, other than that specifically authorized by the court last March, until a Special Management Area Permit has been issued by the City Council.

Sincerely yours,

CITIZENS FOR CAMP KAILUA

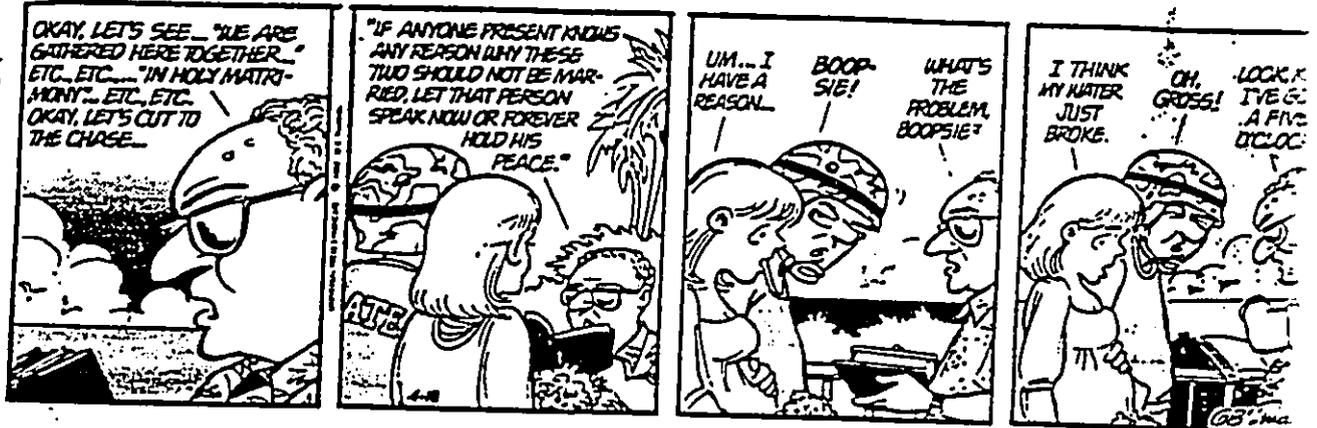
*Ursula Retherford*  
Ursula Retherford

*Paul Taylor*  
Paul Taylor

Attachments: Letter to the Editor of the Star Bulletin

cc: City Councilmembers: Steve Holmes, Leigh Wai Doo, John Henry Felix  
House Representatives: Cynthia Thielen, Jackie Young  
Senator Mary George  
Kailua Neighborhood Board  
Hawaii's Thousand Friends  
Douglas Tom, Director of CZM Program  
U.S. Senators: Daniel Inouye and Daniel Akaka  
U.S. Representatives: Patsy Mink and Neil Abercrombie  
O.E.Q.C. - Office of Environmental Council

Doonesbury



I did more research and found the League of Conservation Voters — a real environmental watchdog organization headquartered in Washington — reports that Hawaii's senior senator voted AGAINST the environment 87 percent of the time last year. Shame on you, Dan.

Barbara Penarosa

Hawaiians have the right to learn own language

I think it is a bad approach for someone from outside of Hawaii — regardless of his credentials — to suggest that the highly successful Hawaiian language immersion program in our schools should be questioned on "legal" grounds (Star-Bulletin, March 24).

Professor Lawrence Fuchs, author and scholar, should remember that it was an "illegal" overthrow of the legitimate government of Hawaii by non-Ha-

waiian forces that helped restrict the use of Hawaiian and helped impose the teaching of a foreign language as the "first" language for the Hawaiian people. The last Hawaiian language school closed in 1910 and for more than 80 years, there has been a plea from this deprived aboriginal segment of our community for what should have been an inalienable right — to learn in their own language.

This program was not born out of "grievances" of the Hawaiian people, however. It relates to the education of our children. The professor is wrong to suggest that

the Board of Education is doing something "quite irresponsible" extending this program.

It is one of the most responsible things they have ever done. The boards of 80 years ago didn't understand this need and take the action then. We would have a truly bilingual society, with masses literate in both of our official languages. And much of our culture that has been lost would still be a part of life in Hawaii.

Keith Han  
Hawaiian language student  
University of Hawaii at Manoa

Camp Kailua is the only 'country club' they know

While visiting a Windward nursing home, a social worker thanked me for my efforts to save Camp Kailua. I almost choked up when she described what the camp had meant to her people. She described the excitement of preparing for the overnight stay at the camp, how they packed up the commodes, the diapers and all that was needed. In several short trips they would transport wheelchairs and patients to the camp near the ocean for a wonderful experience. She volunteered that they had no problems getting around with the wheelchairs at the camp.

A big smile came over her face as she described how the staff would sleep in upper bunks and the patients in lower ones and they would giggle and have fun.

I remembered the pronouncements by Mayor Fasi on how Camp Kailua had seen its day, how the needs of the users of the camp had been met by the new structure at Kailua Field, and how we needed to look to the future. I remem-

bered the many references in newspaper editors and reports to the "run-down old camp," a "collection of ramshackle structures." Granted, compared with luxury hotels, exclusive country clubs, and golf course centers the structures at Camp Kailua seem rather pale. Yet, for the human beings, it was their special country club, the place that occasionally offered them one glimpse near the ocean, away from the four walls of their nursing home.

Their experience on this site in these "ramshackle" structures lit up their lives.

Not so long ago these human beings were active and productive members of our society. But they are not dead. They are members of our community with feelings, needs and rights. When Camp Kailua was closed, the recreation needs and rights of this special group of people, together with the rights of many other disadvantaged groups, were dismissed as irrelevant and non-existent. Is it how we look to the future of our society that has a rapidly growing older population?

Ursula Rothert



OWN  
RIGHT...

DEPARTMENT OF PARKS AND RECREATION  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET  
HONOLULU, HAWAII 96813



FRANK F. FASI  
MAYOR

WALTER M. OZAWA  
DIRECTOR

ALVIN K. C. AU  
DEPUTY DIRECTOR

November 9, 1992

Citizens for Camp Kailua  
150 Hamakua Drive, Suite 793  
Kailua, Hawaii 96734

Attention: Ursula Retherford and Paul Taylor

Dear Citizens for Camp Kailua:

Subject: Environmental Assessments (EA) for Maintenance-Type  
Improvements at Kailua Beach Park

Thank you for your comments on the draft EA for maintenance-type improvements at Kailua Beach Park. In response to your comments, the following is provided.

**A. TECHNICAL CHARACTERISTICS**

The Department of Parks and Recreation (DPR) is currently proposing to only remove blight from various areas of the park, provide improvements related to health and safety, create more open space and improve the general landscape of the park. If other improvements are desired in the future, separate environmental assessments and special management permit applications will be prepared.

Construction drawings of the renovation of the pavilion and a new water line are available for your review at the Department of Parks and Recreation, 650 South King Street, 9th Floor.

Plans are being prepared for upgrading the existing irrigation system throughout the park. These plans will be available for your review within the next two months.

**B. SOCIAL/RECREATION CHARACTERISTICS**

Your comments indicate that cabin camping facilities should be developed at the former Camp Kailua site primarily for use by the elderly and the physically and mentally challenged.

The department is aware of the growth in the elderly population as well as the special needs of the physically and mentally challenged. The function of DPR is to provide, without discrimination, open space and recreation/leisure time facilities and activities for all the people of Oahu.

Camping trips are generally taken to find relief from the rush of urban activities and to enjoy outdoor natural resources. The DPR's position is to provide cabin camping in a spacious area away from residential areas. Facilities built too close to urban areas would require restrictions on noise-generating activities during quiet evening or morning hours. Smoke from cookouts would also be a nuisance to nearby residents.

**C. ECONOMIC, PUBLIC HEALTH, CULTURAL, SOCIAL WELFARE**

The DPR recognizes that there are many social problems on Oahu. However, it must be reiterated that the function of the DPR is to provide, without discrimination, open space and recreational leisure time activities and facilities for all the people of Oahu. The DPR is not allowed to provide facilities for exclusive use by special subgroups.

**D. WATER QUALITY**

The determination that water quality offshore of Kailua Beach park is excellent is based on the State's Department of Health (Chapter 11-54, Water Quality Standards) classification of Kailua Bay waters.

The DPR is aware that during periods of heavy rainfall, the Kaelepulu Stream estuary often contains high level coliform bacteria due to inland runoff and poor circulation. The DPR is not responsible for monitoring these waters nor is it responsible for preventing nonpoint source pollutants.

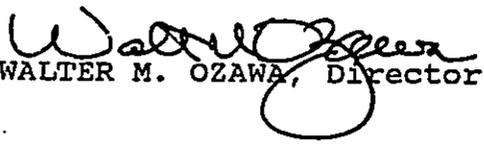
Citizens for Camp Kailua  
Page 3  
November 9, 1992

E. ALTERNATIVES/DETERMINATION

The DPR has determined that the former Camp Kailua site is not suitable for cabin camping. The objective of this EA is to determine whether the proposed maintenance-type actions will have a negative impact on the environment.

Since the proposed actions include health and safety improvements, general upgrading of the landscape, removal of blight and the creation of more open space, the DPR has determined that implementing the proposed actions will improve the environment. These actions are in accord with the shoreline management law which was enacted for the purpose of preserving, protecting and restoring the natural resources of the coastal zone.

Sincerely,

  
WALTER M. OZAWA, Director

WMO:ei

cc: Councilmember Steve Holmes  
Councilmember Leigh Wai Doo  
Councilmember John Henry Felix  
State Representative Cynthia Thielen  
State Representative Jackie Young  
State Senator Mary George  
Kailua Neighborhood Board No. 31  
Hawaii's Thousand Friends  
Douglas Tom, Director, CZM Program  
U. S. Senator Daniel K. Inouye  
U. S. Senator Daniel K. Akaka  
U. S. Representative Patsy T. Mink  
U. S. Representative Neil Abercrombie  
Office of Environmental Quality Control