

Revised Master Plan for Kailua Beach Park

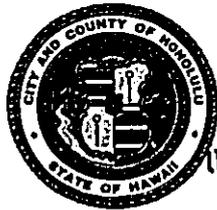
DEPARTMENT OF PARKS AND RECREATION

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

RECEIVED

JEREMY HARRIS
MAYOR



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OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Gary Gill, Director
Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Negative Declaration for Revised Master Plan
for Kailua Beach Park
TMK: 4-3-10: 85, 86, 87, 88 and 4-3-11: 40 and 76
Koolaupoko District, Oahu, Hawaii

The Department of Parks and Recreation, City and County of Honolulu has reviewed all comments received during the 30-day public comment period which began on August 23, 1995 and has determined that this project will not have significant environmental effects.

We are filing a negative declaration for this project. Please publish this notice in the January 23, 1996 Environmental Notice.

We have attached a completed Environmental Notice Publication Form and four copies of the Final Environmental Assessment.

Should there be any questions, please contact Mr. Don Griffin at 527-6324.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ct

Attachments

We Add Quality to Life

5

1996-01-23-0A-*FEA- Revised Master Plan for Kailua Beach Park* ^{JAN 23 1996}

FILE COPY

FINAL ENVIRONMENTAL ASSESSMENT

**REVISED MASTER PLAN
FOR KAILUA BEACH PARK**

Kailua, Koolauapoko, Oahu, Hawaii

Prepared in Partial Fulfillment of the Requirements
of Chapter 343, Hawaii Revised Statutes and
Title 11, Chapter 200, Hawaii Administrative Rules,
Department of Health, State of Hawaii

Responsible Official: *Dona L. Hanaike*

Date: JAN 10 1996

Dona L. Hanaike, Director
Department of Parks and Recreation
City and County of Honolulu

PREFACE

An outdated version of the Kailua Beach Park Master Plan drawing was inadvertently included in the Draft Environmental Assessment. The current Kailua Beach Park Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the Draft Environmental Assessment. The current Master Plan is included in the Final Environmental Assessment.

The text of the Draft Environmental Assessment has not been revised as a result of public review of the Draft Environmental Assessment. All comments received and their responses are appended in the Final Environmental Assessment.

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SECTION 1

SUMMARY INFORMATION

PROPOSED ACTION: Modifications to Kailua Beach Park, including demolition of camp buildings, construction of a new pavilion and canoe halau, new picnic area, pedestrian walkways, realignment of the bikeway, and modifications to existing facilities to provide equal accessibility to the beach park and its facilities.

PROPOSING AGENCY: Department of Parks and Recreation
City and County of Honolulu

LOCATION: Kailua, District of Koolaupoko, Oahu

TAX MAP KEY: 4-3- 9: 1, 2,
4-3-10: 83, 84, 88, 92-95, 101, 102,
4-3-11: 59, 74, 75, 76

LAND AREA: 35.2 Acres

LAND OWNER: City and County of Honolulu

STATE LAND USE DISTRICT: Urban

DEVELOPMENT PLAN AREA: Koolaupoko
Land Use Map: Parks and Recreation

ZONING: P-2, R-7.5

EXISTING USE: Beach Park

PROPOSED USE: The proposed use is consistent with the area's zoning and Special Management Area objectives and policies. No significant adverse impacts are anticipated.

CONTACT PERSON: Don Griffin, Advance Planning Branch Chief
Department of Parks and Recreation
City and County of Honolulu
650 South King Street, 9th Floor
Honolulu, HI 96813
(Phone: 527-6324)

SECTION 2 GENERAL DESCRIPTION OF PROJECT

2.1 Technical Characteristics

The Revised Master Plan for Kailua Beach Park allows for expansion of the beach park into a three-acre parcel acquired to provide more open space for the general public. Modifications to Kailua Beach Park include demolition of existing camp structures, construction of a new pavilion and canoe halau, a new picnic area, pedestrian walkways, realignment of the bikeway, and other modifications to existing facilities to provide for equal accessibility to the beach park, its facilities and recreational opportunities.

2.1.1 Project Use Characteristics

Kailua Beach Park is intended to meet the ocean recreational needs of the public by providing opportunities for a variety of ocean recreational activities and related shoreline recreation such as picnicking. Located at the ocean's edge serving one of the largest communities in the State, Kailua Beach Park is a very popular recreational area for island residents. (See Location Map, Figure 1).

This project will provide minor, compatible improvements resulting in expanded use of Kailua Beach Park. The proposed changes included within this revised Master Plan will have no detrimental effect on, and in fact will enhance the current use of the facility as a public beach park.

The ocean at Kailua Beach has been used for therapeutic recreation by the physically disabled. Therefore, a major objective of this project is to make the beach park fully accessible and provide for the integration of therapeutic recreational opportunities with all other beach-going activities.

Additional changes include providing storage for outrigger canoes, and realignment of part of the bikeway to provide cyclists with a safer route.

2.1.2 Project Physical Features

The new physical features will include an open-air pavilion and a canoe halau. The existing buildings at the old camp will be demolished and replaced by landscaped picnic areas and open space. The old parking lot at the camp will be removed. Other physical features will include walkways, fitness equipment, and modifications to the existing pavilion and existing parking lot. (See attached Revised Master Plan).

The new pavilion will be roofed to provide shade and protect against rain, but otherwise unenclosed to preserve views within the park.

The new canoe halau will be constructed near the banks of Kaelepulu Stream, at the present canoe storage area next to the parking lot. It will provide support for the many outrigger canoe clubs which have traditionally used Kailua Beach for canoe racing regattas and practice. The halau will be an open, roofed structure.

The interior floor space of the existing pavilion at Kailua Beach will be expanded to accommodate a storage area for surf chairs (wheelchairs with special tires that allow access to the water), and portable walkways (rubberized matting).

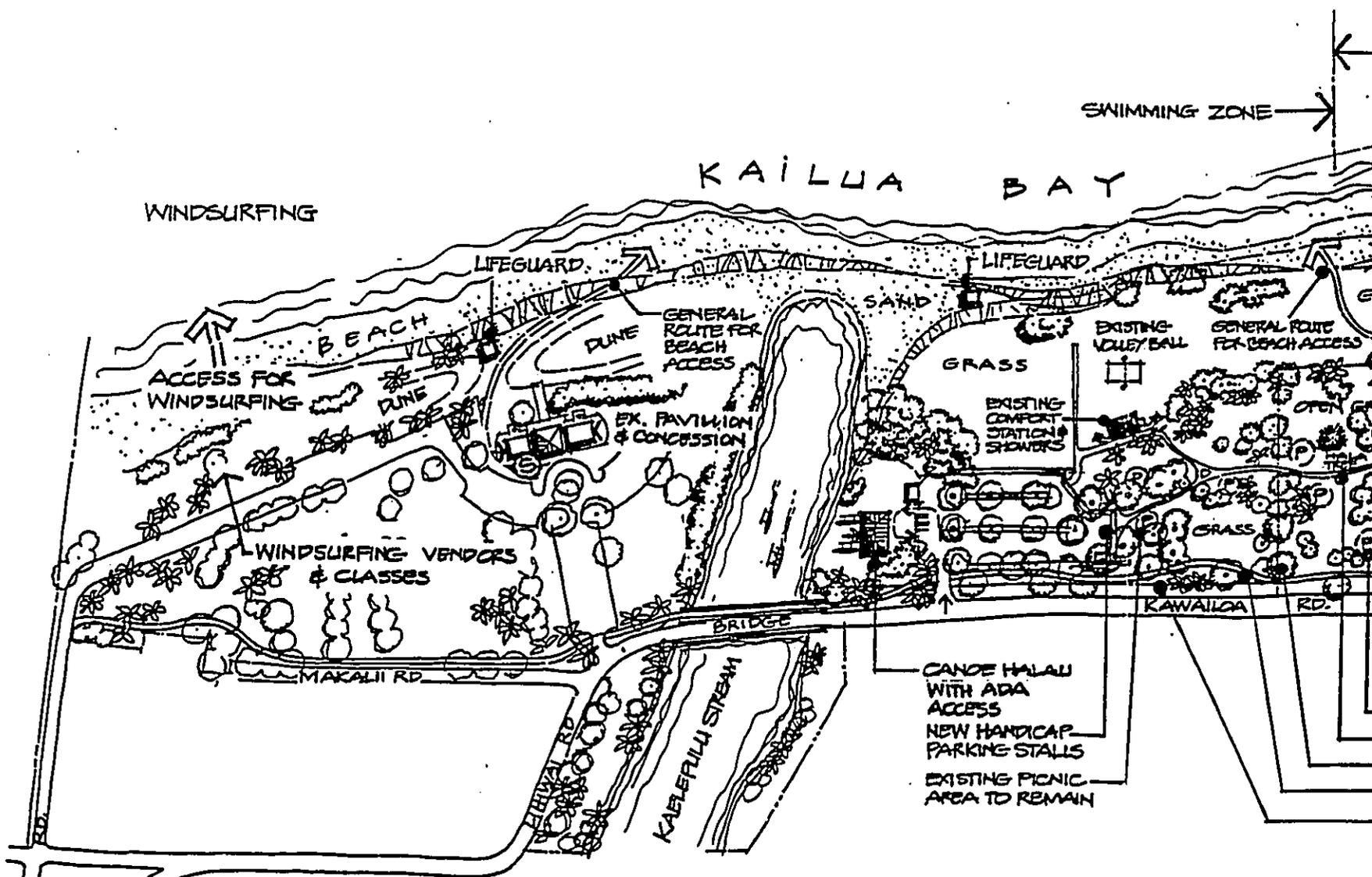
The new picnic area will be designed for general public use and equal accessibility by a system of surfaced walkways. Landscaping in the area will include low, grassed berms aesthetically compatible with the walkways.

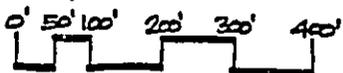
All physical improvements to the beach park will be designed for equal accessibility in accordance with the standards of the Americans with Disabilities Act.

A segment of the bikeway currently designed to skirt the beach park along Kawailoa Road, will be realigned inside the park boundary for safety purposes.

2.1.3 Construction Activities

Construction activities associated with this project will involve the demolition and removal of existing buildings and parking lot at the former camp area. No structures will be left standing except the small fale. The existing asphalt parking lot will be removed and grassed over. The project will involve some clearing and grubbing and minor grading. Walkways will be laid and electrical conduits for security lighting will be installed. Water lines to support an automatic irrigation system will also be installed.



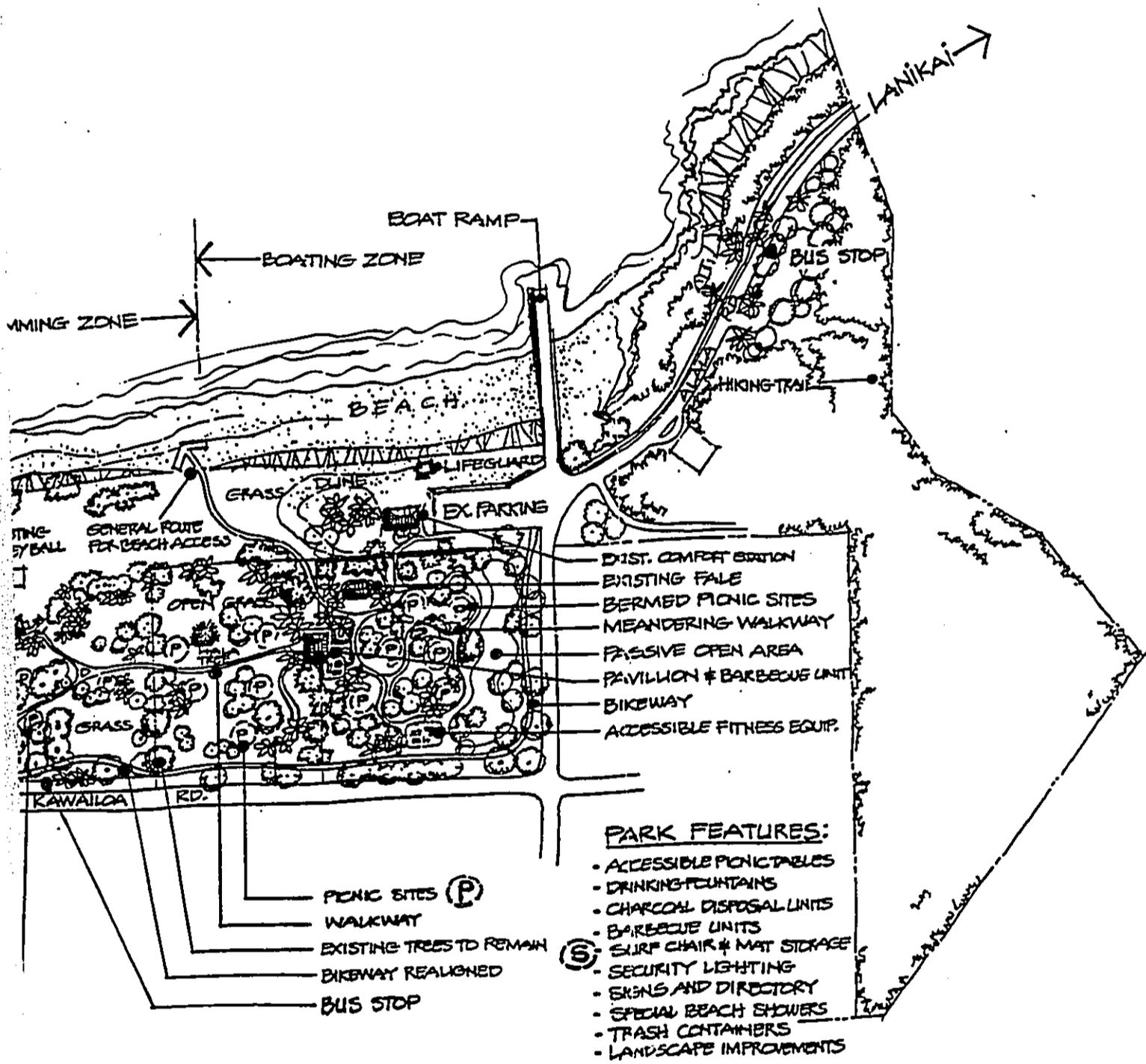
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date: January 10, 1996

DEPARTMENT OF PARKS & RECREATION
 CITY & COUNTY OF HONOLULU

REVISED MASTER PLAN KAILUA BEACH PARK

Kailua, Koolaupoko, Oahu, Hawaii



MASTER PLAN FOR BEACH PARK

Hawaii

Two new structures will be constructed in the park: the open pavilion and the canoe halau. Construction will also include extending the existing, beach park parking lot (located on Kawailoa Road) to provide eight handicap parking stalls. The existing pavilion will be expanded for storage. Finally, a chain barrier will be installed along the portion of the park abutting Kawailoa Road.

2.1.4 Utility Requirements

Electrical service will be installed in the new pavilion.

Landscape irrigation will be extended from the existing park irrigation system.

2.1.5 Liquid Waste Disposal

Dry wells will be installed to handle the flow from new drinking fountains. No other plumbing improvements are proposed, so the present liquid waste disposal will not be affected.

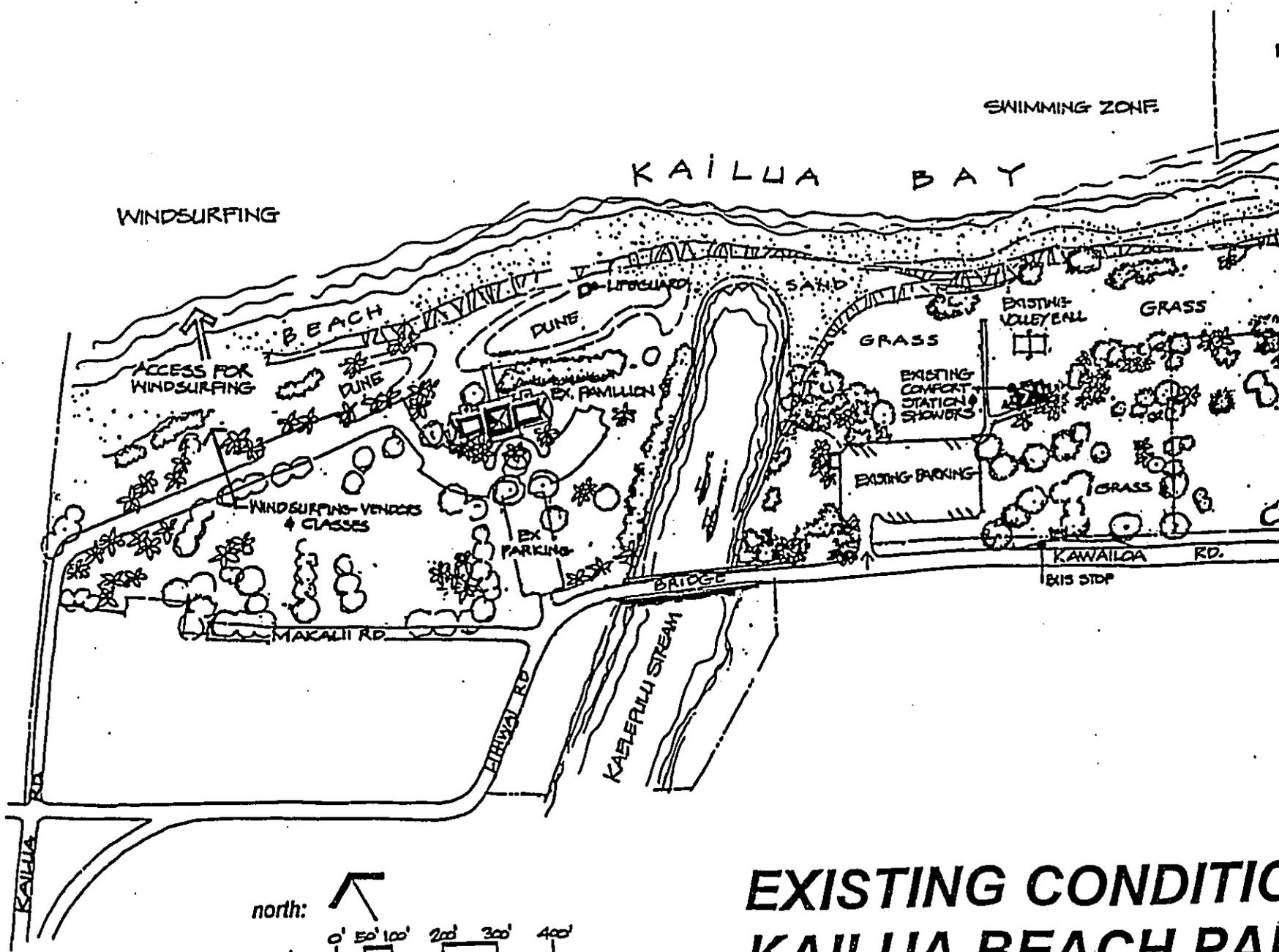
2.1.6 Solid Waste Disposal

Solid waste disposal will not be affected by the planned improvements. Solid waste generated at Kailua Beach Park is currently handled by park maintenance personnel.

2.1.7 Access to Site

Kailua Beach Park is accessed through three separate entrances. Parking lots at Kailua Beach Park may be entered off of South Kalaheo Avenue, Kawailoa Road and Alala Road. (See attached Site Map, Figure 2).

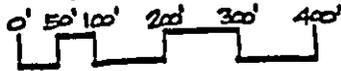
Primary access to the new pavilion and new picnic area will be available directly through the existing Kawailoa Road parking lot.



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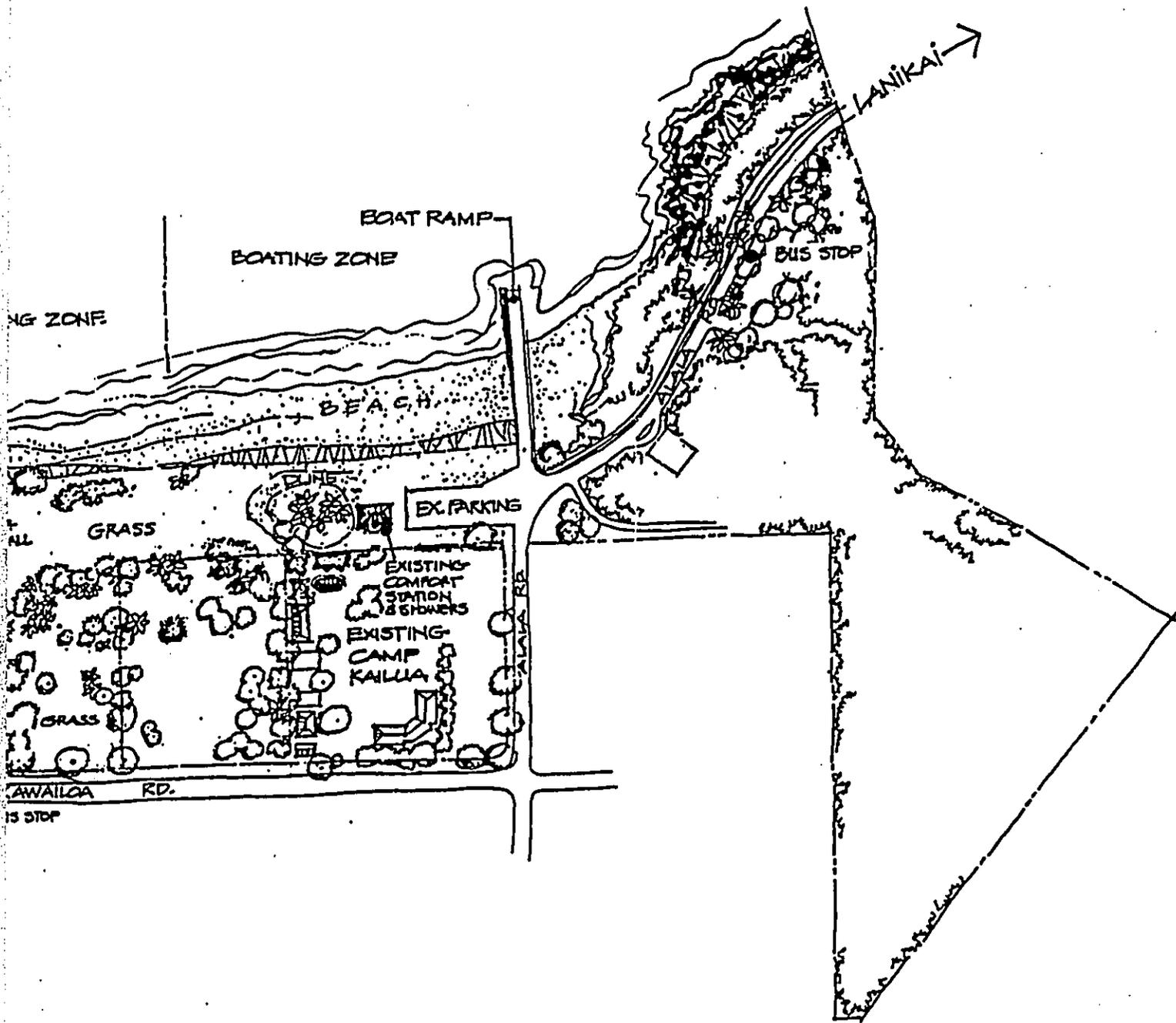
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date: January 10, 1996

DEPARTMENT OF PARKS & RECREATION
CITY & COUNTY OF HONOLULU



**CONDITIONS PLAN
BEACH PARK**

2.2 Social and Recreational Characteristics

The expansion of the beach park and the proposed improvements are consistent with longstanding policy for the development of City and County of Honolulu beach parks. Under this general policy, all beach parks are acquired and developed for islandwide use. They are designed for open space and ocean-related recreational activities. Those which present unique features are developed for the ocean-related uses to which they are best suited; for example, some offer surfing, others offer sheltered reefs with an abundance of marine life, or calm waters for swimming. Some beach parks offer breathtaking views, and others are well-suited for canoeing, picnicking or fishing.

Kailua Beach Park has long been recognized as one of the best on the island; offering scenic vistas, benign waters and lending itself to a wide variety of beach and ocean-related activities including outrigger canoeing, windsurfing, swimming, picnicking, bicycle riding, jogging, and sunbathing. These are the primary social and recreational characteristics of the beach park, and the proposed improvements will expand and enhance these recreational opportunities for all of the park users.

Until 1991, there was cabin camping at the beach park. This was a remnant from earlier years when the parcel was owned by the United Methodist Church, which developed the camp facility and used it for meetings and retreats. The property was purchased in 1982 by the City for expanded beach park, but the camp was allowed to remain until all the adjacent residential parcels were purchased. They were to be consolidated with the camp area in final realization of the Kailua Beach Park Master Plan to acquire and develop an expanded beach park for future generations.

Accordingly, the existing Master Plan for Kailua Beach Park calls for the former camp area to become open space. Objections to the demolition of the camp have been raised by persons who feel that the facility was suited for use by the disabled, the disadvantaged, and the elderly, and that the relatively calm waters of Kailua Beach are well-suited for use by that unique population. They have made the argument that the removal of the camp would unfairly penalize such persons. These views notwithstanding, the absence or presence of any facility serving both disabled and non-disabled populations, affects both equally. Therefore, neither population is exclusively served nor penalized.

Furthermore, the lack of a cabin camping facility on a city beach park is consistent with the division of responsibility between the City and State regarding management and use of park resources. The counties generally acquire and manage active recreational areas, including beach parks. The State manages conservation areas, large passive-type parks, and cabin camping. Despite this policy, there is

sentiment, recently expressed by the Honolulu City Council by ordinance, that the City should provide cabin camping at both beach and inland locations.

There is general agreement that cabin camping is a desirable social and recreational activity, and that it should be provided where suitable and feasible. However, cabin camping is incompatible with the recreational uses of Kailua Beach Park as well as inconsistent with the objective of the Kailua Beach Park Master Plan to provide expanded beach park and open space.

Recognizing that this beach park is as well-suited for use by the physically disabled as the general population; and consistent with the City's goal to make its public facilities equally accessible to the greatest extent possible, the proposed revisions to the Master Plan for Kailua Beach Park include accommodations for the physically disabled, integrated with the expansion of the beach park for the benefit and use of all beach-goers.

2.3 Economic Characteristics

The cost of improvements is estimated at approximately \$700,000.

SECTION 3 **APPLICABLE LAND USE 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 State Board of Land and Natural Resources must approve a Conservation District Use Application for improvements within the Conservation District. None of the proposed improvements is within the Conservation District.

The City's Koolaupoko Development Plan (DP) Land Use Map designates most of Kailua Beach Park as "Park and Recreation." The DP Land Use Map designates the lands acquired for the park expansion which were previously house lots as "Residential," and all of Kaelepulu Stream is designated as "Preservation."

Kailua Beach Park lies entirely within the State's Special Management Area

(SMA). Improvements recently completed under the existing Master Plan include renovation and repair of the pavilion, comfort station and concession, and irrigation and landscaping under City Council Resolution No. 93-134, CD-1, May 26, 1993. The SMA ordinance provides that any change to the project requires a new SMA use permit.

The Flood Insurance Rate Map (FIRM) designates most of Kailua Beach Park as within Zone X, outside the 500-year floodplain. Mauka of the Kawailoa 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. (See attached FIRM Map, Figure 3).

SECTION 4 **AFFECTED ENVIRONMENT**

4.1 Topography and Soils

Kailua Beach Park is at the eastern edge of a coastal plain which extends more than 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. All proposed improvements will be constructed within the portion of the park that is less than 10 feet above mean sea level. A series of sand dunes has accumulated along much of the shoreline of the park, and in some sections extends inland. Sections of the dunes within the park are covered by grasses, wedelia, beach morning glory, beach naupaka, stands of ironwood and silver buttonwood. No work is proposed seaward of the vegetation line or dune areas.

4.2 Beach Processes

The sandy beach that comprises the shoreline of Kailua Bay is about 13,000 feet long, and is bounded by two rocky headlands, Kapoho Point on the northwest and Alala

Point on the southeast. The shorelines of these headlands consist primarily of emerging reef rock and contain small pockets of sand.

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 in the *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 in the southern portions of the park where between 1949 and 1988 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 at the southern portion of the park. 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 on the southern side of the ramp than on the northern side of the ramp. Winds from most other directions reverse the pattern of scouring and accretion.

In 1977, so much tradewind generated beach erosion occurred in the area of the boat ramp that the Department of Parks and Recreation 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.

4.3 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 improved City storm drains. Most rainfall on the park and abutting lands on the coastal plain infiltrates the sandy soil. After heavy rains, runoff occasionally ponds on the unpaved shoulder of Kawailoa 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 generally adequate capacity to handle runoff from the heaviest rainfall likely to occur within 100 years, so long as its outlet has been maintained. The City's Department of Public Works bulldozes an opening in the stream-mouth sand bar whenever it rains. Otherwise, the sand at the mouth is usually intact.

Kelepulu Stream is the only surface water resource in Kailua Beach Park. There is no potable aquifer underlying the park.

4.4 Water Quality

The waters of the bay have been listed as Marine Waters Class "A." This classification includes waters which are suitable for recreational purposes, aesthetic enjoyment, propagation of fish, shellfish, and wildlife.

Because of the nature and composition of inland runoff and poor circulation, the Kaelepulu Stream estuary often naturally contains too much coliform bacteria to meet State water quality standards. This affects the nearshore water quality in the vicinity of the stream whenever the stream mouth is opened and its waters drain into Kailua Bay.

4.5 Natural and Man-Made Hazards and Nuisances

Portuguese man-of-war (stinging jellyfish) blown onshore by tradewinds are the most common natural hazard found in the waters and along the shoreline at Kailua Beach Park.

The park is not at risk from air pollution, noise, flooding, subsidence, or long-term beach retreat, and park users are not exposed to strong currents or large breaking waves while swimming.

Present barriers to accessibility for persons with disabilities include a lack of adequate parking, walkways, shower transfer benches, and picnic tables to accommodate wheelchairs. In addition, there is no accommodation for wheelchairs to traverse over the sand to the ocean.

Traffic in the residential urban area near Kailua Beach Park is significant. In addition to the vehicular traffic, bikers, joggers, pedestrians, park users and others in the community contribute to heavy usage of access roads and paths.

4.6 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, sea grape, false kamani, and various grasses. As noted earlier, the dunes are covered by grasses, wedelia, beach morning glory, beach naupaka, stands of ironwood and silver buttonwood.

4.7 Historic Sites and Archaeological Resources

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

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 of the low-lying portions 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 the old camp area. In 1884, the site of the existing 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 Lihikai Road, was the center of the Kaelepulu Stream channel.

4.8 Coastal Views

The existing pavilion and dune crest makai of the pavilion block most, but not all, ocean views from Lihikai Road across the pavilion parking lot. There is a scenic view

from the Kawaihoa Road bridge of the shoreline at the Kaelepulu Stream mouth. The dune crest also blocks most of the ocean views from Kawaihoa Road across the Kawaihoa parking lot. Ocean views from Kawaihoa Road across the old camp area are completely obstructed by buildings, shrubs and some ironwood trees. Ocean views from Kawaihoa Road across the former house lot area are now an unobstructed expanse of ocean vista. There are striking views of the ocean and shoreline from Alala Road between the Alala parking lot and Alala Point. The 1987 *Coastal View Study* completed by the Department of Land Utilization identifies this stretch of roadway as having the only significant coastal views in Kailua. The report describes the significant views from this area. Mauka views include Kaelepulu Stream and Mid Pacific Golf Course. Makai views include Kailua Beach Park and Popoia Island.

4.9 Park and Nearshore Recreational Use

Kailua Beach Park is heavily used by picnickers, walkers, joggers, swimmers, sunbathers, windsurfers, canoers and boaters. Recreational conflicts led the State Department of Transportation to adopt statewide rules in 1991, including regulation of 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. An area in the northern end of the beach park was set aside in 1988 by ordinance allowing commercial windsurfing instruction. Windsurfing priority in this designated area does not apply on weekends.

Outrigger canoes have first priority for use of shore waters abutting 100 feet of shoreline at the mouth of Kaelepulu Stream. When this area is in use by manually propelled vessels, swimming is restricted. Otherwise, to protect swimmers, all vessels and windsurfers are prohibited from using the park shore waters beginning 300 feet from the Kailua end of the park and ending 275 feet from the boat ramp's Kailua side.

Park use is higher on weekdays during the summer than during the school year and higher on weekends and holidays than on weekdays. Based on counts taken at approximately two-hour intervals by Water Safety Officers over an 8-hour work day, attendance at Kailua Beach Park for the twelve-month period ending June 30, 1993, was estimated at 679,385.

4.10 Adjacent Land Uses

As shown in Figures 1 and 2, Kailua Beach Park is surrounded by residential dwellings. One private business is located nearby on Kawailoa Road.

4.11 Parking and Traffic

Kailua Beach Park has enough internal parking to accommodate users on weekdays. However, parking is overflowing the beach park on the weekends and holidays, causing unauthorized parking on grass areas of the park.

SECTION 5 **IMPACTS AND MITIGATION MEASURES**

5.1 Short-Term Impacts

Other than temporary closure of the areas under construction, improvements planned for Kailua Beach Park will not have any significant short-term impacts.

5.1.1 Topography and Soils

Construction of the proposed projects will not have any significant short-term impact on the topography and soils at Kailua Beach Park. However, topography will be changed by the addition of low, grassed berms, and the addition of topsoil for planting will change the composition of existing soil, which is mostly sand.

5.1.2 Drainage and Water Quality

The proposed improvements will not significantly change existing drainage patterns.

Because the canoe halau will be constructed near Kaelepulu Stream, erosion control precautions will be taken as required by law to minimize the risk of runoff.

5.1.3 Hazards, Nuisances, and Aesthetics

The demolition of the existing structures at the old camp site and the construction of new facilities in the park will temporarily generate noise and dust. These impacts should be minimal. The nearest residences are across Alala and Kawaihoa Roads and should not be adversely impacted by construction activities.

5.1.4 Archaeological Resources

The proposed modifications to the park will occur in areas believed to represent lands which have accreted since historic times. In the event that construction activities uncover any archaeological artifacts or prehistoric human remains, work in the immediate area will be stopped, and the State's Division of Historic Preservation will be notified and consulted for further directions.

5.1.5 Park and Nearshore Recreational Use

Construction activities occurring in the portion of the park which is currently closed to the public should not impact existing park and nearshore recreational use. Construction of the canoe halau and the expansion of the existing parking lot may temporarily disrupt parking in this area of the park.

5.1.6 Beach Processes

The proposed project should have no short-term impacts on beach processes nor contribute to any instability, beach accretion or erosion.

5.1.7 Construction Activities

The major short-term impact associated with this project will arise from construction activities. Industry standard practice will be followed to minimize the impact of the construction work on surrounding residences, environment and park users. The adjacent areas of the park will remain open to public use during the period of construction.

5.2 Long-Term Impacts

The park improvements will increase accessibility and ocean-related recreational opportunities for persons with disabilities as well as the general public.

5.2.1 Topography and Soil

The revised Master Plan has been formulated to minimize the impact of planned improvements on the natural topography of the park. Natural sand dunes will remain unaltered.

5.2.2 Drainage and Water Quality

There will be no significant impact on drainage and water quality generated by these improvements. Because of its proximity to Kaelepulu Stream, construction of the canoe halau will be carefully monitored to prevent runoff from construction activities.

5.2.3 Hazards, Nuisances, and Aesthetics

The removal of the deteriorated buildings in the former camp area and the creation of new landscaping and recreational facilities in the park should improve the aesthetic appearance and security of the park by providing more open views.

5.2.4 Archaeological Resources

Most of the park improvements will take place in locations which are believed to have accreted in the relatively recent past. Therefore, the project should have little, if any, impact on any prehistoric, archaeological resources.

5.2.5 Park and Nearshore Recreational Use

The proposed changes will enhance the use of the park and nearshore areas. It will increase the opportunities for persons with disabilities to use the ocean and ocean-related recreational facilities; at the same time it will increase recreational opportunities for all members of the public.

5.2.6 Beach Processes

The proposed plan will have no long-term impact on beach processes. All significant modifications will be located away from areas of wave action, beach accretion and erosion.

5.2.7 Construction Activities

There should be no long-term impacts associated with these construction activities.

SECTION 6

ALTERNATIVES CONSIDERED

6.1 No Action

One alternative would be to leave the park as it currently exists. In the existing condition, there is minimal accommodation for integration of accessibility features with the rest of the park. Also, the old camp continues to deteriorate and presents a liability risk to the City. This area is fenced off and unused. It represents a loss of open space and is a visual blight. The surrounding community has a right to expect that it will be cleaned up, and the general public should have it returned for their general use. For these reasons, the no action alternative is unacceptable.

6.2 Cabin Camping at Camp Kailua

Another alternative that has been supported by certain groups and individuals is the restoration of cabin camping at the old camp site. This does not agree with the City's long-established and publicly stated intentions to clear the space and expand the beach park. Furthermore, the deteriorated condition of the buildings would necessitate excessive restoration expenditures.

As previously stated, cabin camping in Kailua Beach Park is an incompatible use of this urban beach area. Similarly, tent camping, which was allowed there until 1977, was discontinued by the City at the request of the residents.

The City supports cabin camping in more appropriately suited rural sites. Currently, the City has a committee whose objective is to locate and recommend a site or sites for City-sponsored cabin camping in the Koolaupoko region.

One alternative considered and submitted to the City Council for a Shoreline Management Permit (SMP), proposed demolishing all of the camp buildings except one, to be retained for a headquarters for water safety officers (lifeguards), storage of their equipment, and an ocean recreation program. This alternative also included retaining the existing parking lot at the camp site to provide for the additional parking that is needed at the beach park. However, this SMP never moved in the City Council and was refused a hearing. It was therefore dropped as an alternative.

SECTION 7 **PROPOSED DETERMINATION**

7.1 Consideration of the Project's Significance

As required under Chapter 200 (Environmental Impact Statement Rules) of Title 11, Administrative Rules of the State Department of Health, Section 11-200-12, the following criteria have been considered in determining the sum of this project's potential environmental effects:

- 1) Does the project involve an irrevocable commitment to or loss or destruction of any natural or cultural resource?

No. The project area has already been significantly altered for recreational purposes. The proposed changes will not adversely impact any natural or cultural resource.

- 2) Does the project curtail the range of beneficial uses of the environment?

No. The project provides for expanded beneficial use of the environment.

- 3) Does the project conflict with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 344, Hawaii Revised Statutes, its revisions and amendments, court decisions, and executive orders?

No. The project does not conflict with the goals and guidelines expressed in Chapter 344, Environmental Assessment Rules.

- 4) Does the project substantially affect the economic or social welfare of the community or state?

This project will have no adverse affect on the economic welfare of the community or state. The project will have a significant beneficial social impact by providing expanded, integrated accessibility to Kailua Beach Park and its recreational opportunities.

- 5) Does the project substantially affect public health?

Public health is not substantially affected by this project. The general health of the population is enhanced by additional opportunities to more fully participate in an outdoor recreational environment.

- 6) Does the project involve substantial secondary impacts, such as population changes or effects on public facilities?

No. The project will not have any substantial secondary impact.

- 7) Does the project involve a substantial degradation of environmental quality?

No. The project will not result in substantial degradation of environmental quality.

- 8) Does the project have a cumulative affect upon the environment or involve a commitment for larger actions?

The project does not have a cumulative affect upon the environment nor involve any commitment for larger actions.

- 9) Does the project substantially affect a rare, threatened or endangered species, or its habitat?

No.

- 10) Does the project detrimentally affect air or water quality or ambient noise levels?

During construction the project may have a minor impact on air quality and ambient noise levels. However, these impacts will be temporary and are unlikely to extend very far beyond the park's boundaries.

- 11) Does the project affect any environmentally sensitive area such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters?

No. The project will not have any detrimental impacts on any environmentally sensitive areas.

7.2 Proposed Mandatory Finding of Significance

Based upon the foregoing determining factors, the revisions to the Master Plan for Kailua Beach Park will not result in significant environmental impacts.

SECTION 8

AGENCIES AND ORGANIZATIONS NOTIFIED

U.S. Army Corps of Engineers, Pacific Ocean Division
U.S. Department of Agriculture, Natural Resources Conservation Service

Office of State Planning
State Department of Health (DOH)
 DOH Environmental Management Division
 DOH Commission on Persons with Disabilities
State Department of Land and Natural Resources (DLNR)
 DLNR Historic Preservation Division
 DLNR Oahu Land Management District Office
State Department of Transportation
University of Hawaii Environmental Center
University of Hawaii Water Resources Research Center

City Building Department
City Department of Land Utilization
City Department of Transportation Services
City Department of Public Works
City Department of Wastewater Management
City Planning Department
Honolulu Board of Water Supply
Honolulu Police Department
Mayor's Committee for People with Disabilities

State Senator Whitney Anderson
State Senator Michael Liu
State Representative Eve Anderson
State Representative Devon Nekoba
State Representative Cynthia Thielen

Members of the Honolulu City Council

Citizens for Camp Kailua
Folks for Spokes
Hawaii Bicycling League
Hawaii's Thousand Friends
Hui Wa'a
Kailua Neighborhood Board
Oahu Hawaiian Canoe Racing Association

APPENDIX A

COMMENT LETTERS AND RESPONSES

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU

630 SOUTH BERETANIA STREET

HONOLULU, HAWAII 96843



September 20, 1995

JEREMY HARRIS, Mayor
WALTER O. WATSON, JR., Chairman
MAURICE H. YAMASATO, Vice Chairman
KAZU HAYASHIDA
MELISSA Y.J. LUM
FORREST C. MURPHY
KENNETH E. SPRAGUE

RAYMOND H. SATO
Manager and Chief Engineer

DEPT. OF PARKS
& RECREATION
CITY OF HONOLULU, HI

RECEIVED
1995 SEP 21 P 2:55

TO: DONA L. HANAIKE, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: *Raymond H. Sato*
RAYMOND H. SATO, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR MEMORANDUM OF AUGUST 10, 1995 ON THE DRAFT
ENVIRONMENTAL ASSESSMENT (DEA) FOR THE KAILUA BEACH PARK
REVISED MASTER PLAN, TMK: 4-3-9: 01, 02, 4-3-10: 83, 84, 88, 92-95, 101,
102, 4-3-11: 59, 74-76, KAILUA, OAHU, HAWAII

Thank you for the opportunity to review the DEA for the revised master plan. We have the following comments:

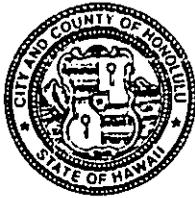
1. There are four water meters currently serving the proposed project site.
2. If a three-inch or larger meter is required, the construction drawings showing the installation of the meter should be submitted for our review and approval.
3. The availability of water will be confirmed when the building permit application is submitted for our review and approval. When water is made available, the applicant will be required to pay the prevailing Water System Facilities Charges for resource development, transmission and daily storage.
4. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.
5. The use of nonpotable water for irrigation of the beach park should be investigated.
6. Drought tolerant plants should be utilized for landscaping purposes.
7. A Board of Water Supply approved double check valve backflow prevention assembly should be installed on each of the domestic waterlines immediately after the property valve and prior to any branch piping.

If you have any questions, please contact Barry Usagawa at 527-5235.

95-2918
9/21/95 RB

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

TO: RAYMOND H. SATO, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

FROM: DONA L. HANAIKE, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

Thank you for the comments in your September 22, 1995 memorandum concerning the Draft Environmental Assessment prepared for the subject project. The information concerning the number of water meters serving the project site will aid in our planning for the park. The Department of Parks and Recreation will comply with the other six items specified in your memorandum.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at extension 6324.

A handwritten signature in cursive script, reading "Dona L. Hanaike".

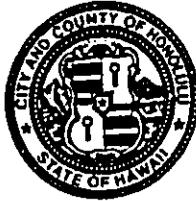
DONA L. HANAIKE
Director

DLH:ei

PLANNING DEPARTMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



CHERYL D. SOON
CHIEF PLANNING OFFICER

CAROLL TAKAHASHI
DEPUTY CHIEF PLANNING OFFICER

MH 8/95-1674

September 19, 1995

RECEIVED
1995 SEP 21 A 10:22
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

MEMORANDUM

TO: DONA L. HANAIKE, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: CHERYL D. SOON, CHIEF PLANNING OFFICER
PLANNING DEPARTMENT

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (DEA) FOR KAILUA BEACH
PARK REVISED MASTER PLAN, TAX MAP KEYS: 4-3-9: 1, 2; 4-3-10:
83, 84, 88, 92-95, 101, 102; AND 4-3-11: 59, 74-76

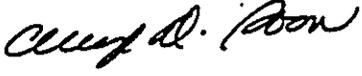
In response to your department's request of August 10, 1995, we have reviewed the subject DEA and have the following comments to offer:

1. We confirm that the subject site is designated for Parks and Recreation use on the Koolaupoko Development Plan Land Use Map.
2. The Koolaupoko Development Plan Public Facilities Map shows symbols for publicly funded improvements for additional right of way and new streets, beyond six years, to the following roads that are in the general vicinity of the subject site:
 - a. Kailua Road (Wanao Road to Kalaheo Avenue, and Kailua Road to Lihiwai Road);
 - b. Kawailoa Road (Lihiwai Road to Alala Road); and
 - c. Alala Road (Kawailoa Road to Mokulua Drive).
3. We have no objections to the proposed park improvements which would increase accessibility and provide ocean-related recreational opportunities for all members of the general public.

95-2913
9/21/95

Doña L. Hanaïke, Director
Department of Parks and Recreation
September 19, 1995
Page 2

Should you have any questions, please contact Matthew Higashida of our staff at 527-6056.


CHERYL D. SOON
Chief Planning Officer

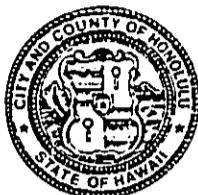
CDS:js

cc: Office of Environmental Quality Control

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K. C. AU
DEPUTY DIRECTOR

January 10, 1996

TO: CHERYL D. SOON, CHIEF PLANNING OFFICER
PLANNING DEPARTMENT

FROM: DONA L. HANAIKE, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

Thank you for the comments in your September 19, 1995 memorandum concerning the Draft Environmental Assessment prepared for the subject project. The Department of Parks and Recreation will use the land use and public facilities information contained in your letter in our planning for Kailua Beach Park.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at extension 6324.


DONA L. HANAIKE
Director

DLH:ei



CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

STEVE HOLMES
Councilmember
(808) 547-7002

August 31, 1995

Mr. Gary Gill
Director
Office of Environmental Quality Control
220 S. King Street, Suite 400
Honolulu, Hawai'i 96813

RECEIVED
195 SEP -5 P 3:40
DEPT. OF PUBLIC
WORKS
CITY AND COUNTY OF
HONOLULU

SUBJECT: Kailua Beach Park Revised Master Plan
Draft Environmental Assessment

Dear Mr. *Gary* Gill:

This letter is in response to the Kailua Beach Park Revised Master Plan Draft Environmental Assessment published in the August 23, 1995 Office of Environmental Quality Control bulletin for public comment. I will respond to several different proposed features of the Draft EA and then make some general comments.

Apparent Realignment of Entry Road to Kailua Beach Park

Based on the conceptual drawing provided, the entry road to Kailua Beach Park fronting the existing pavilion appears to have been realigned. If this conceptual drawing is accurate, the realignment should have been addressed in the text of the Draft EA. There is no explanation as to why the roadway is being realigned and there is no text that explains how it is being realigned.

There are several concerns with a realignment of the entry road, the most serious being the noise and traffic impact on the residents of Makalii Road. Moving the road closer to these residents has been opposed in the past due to these concerns.

The drawing also labels the road as "Park Rd./Parking" but fails to denote how many head-in parking spaces will be provided on this road. Will the parking be increased, decreased or stay the same? Will parallel parking also be provided?

9152418
915195910

Page Two
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August 31, 1995

I am unable to determine from the drawing if the traffic pattern will remain one way through this road or changed to accommodate two-way traffic. In either case, the traffic circulation and realignment will affect the amount of cars entering the park, and these traffic pattern issues were not addressed in the Draft EA.

Commercial windsurfing businesses licensed by the City to operate at Kailua Beach park use the current road to park their vehicles. If only head-in parking is provided as indicated by the drawing, the commercial windsurfer vehicles will be unable to fit in the spaces. Another concern is the hardship created by realignment of the road on the commercial windsurfing operators due to the increase in distance from the road to the ocean.

Commercial Windsurfing Operations

This conceptual drawing does not depict an area for commercial windsurfing operations to conduct their business. The current area used by the commercial windsurfing operators is not depicted. Further, the map shows an arrow pointing somewhere off the map as the area for windsurfing. We are unsure if a staging area is being provided somewhere down shore from the Beach Park or if the City will discontinue issuing commercial windsurfing permits. The impact of commercial windsurfing operating in Kailua Beach Park is not discussed in the text.

Lifeguard Stations

Just one lifeguard station is depicted on the boating end of Kailua Beach Park, a great distance away from the swimming zone. This makes no sense. Why is it in the boating area? Will this one lifeguard station provide effective water safety officer coverage for the entire Kailua Beach Park? It appears from the map that the other lifeguard stations are eliminated. Again, no text covers this issue. If this is the case, this would compromise public safety.

Revisions to First Parking Lot Fronting Existing Pavilion

The conceptual drawing depicts a completely altered parking lot fronting the existing pavilion, however none of these improvements are discussed in the text of the Draft EA. Traffic patterns, traffic impacts, number of parking spaces, and size of spaces are not addressed. Is this parking lot being expanded to provide additional parking and/or parking for tour bus operators?

Water Quality Issues Related to Kaelepulu Stream

Section 4.4, page 9, states that the "Kaelepulu Stream estuary naturally contains too much coliform bacteria to meet State water quality standards." However, the Draft EA does not address what measures will be taken to improve the water quality of Kaelepulu Stream and reduce pollutants in the area. This is particularly critical because the stream is used by canoe paddlers for paddling and small children for wading.

Canoe Halau

No conceptual drawings were provided of the Canoe Halau, which will be built in the Shoreline Management Area. From the Draft EA I am unable to determine what view plane impacts the Canoe Halau building will have when looking makai from Kawailoa Road. Concerns have also been raised by canoe paddling organizations in the past about the siting of the Canoe Halau. Some canoe paddlers were concerned about the Halau being located in an area too narrow for canoe trailers to turn around. Can the area accommodate canoe trailers? What is the size of the halau and the projected number of users, and the impact of those users on the recreational resources of the park? Did the City work with the Oahu Hawaiian Canoe Racing Association in its design and siting of the Canoe Halau? It is our understanding they did not.

Destruction of Camp Kailua

The arguments laid out to support the destruction of Camp Kailua in Section 6.2A are contrary to established City policy. Editorial comments on pages 5, 6 and 16 do not reflect City policy.

Ordinance 92-35, attached, established cabin camping as a City function primarily as a result over the debate of Camp Kailua.

Resolution 93-143 CD-1, attached, granted a Shoreline Management Area Permit for renovations and upgrades at the park but specifically disallowed demolition of Camp Kailua. The City Council held extensive public hearings, as required by City Charter, prior to adopting the SMA permit which instituted the restoration of Camp Kailua as City policy.

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August 31, 1995

Serious questions can be raised as to whether the demolition of Camp Kailua would violate Federal and State Coastal Zone Management law because of the existing SMA permit and the value of the camp as a recreational resource in the shoreline management area.

This facility, in its last year of operation, serviced over 20,000 people. The Draft EA includes no discussion of the social impacts of the proposed action.

It should be noted that the State House passed Resolution 34 (1991), attached, in favor of restoring Camp Kailua, and many legislators themselves have come out to testify in favor of restoring the Camp during the public hearing process. The Kailua Neighborhood Board has taken a formal position to restore the Camp along with many other diverse community groups.

Boat Ramp Maintenance

Nowhere in the Draft EA is there a discussion of which governmental agency will control, maintain, and operate the boat ramp. This boat ramp is heavily used by motorized and non-motorized craft, and the Draft EA does not distinguish which craft will be allowed to launch off the boat ramp. The City Department of Parks and Recreation has long discussed transferring this boat ramp to the appropriate State agency, but this issue has remained unresolved and is not addressed in the Draft EA. Will boating uses change? Are there any projections of the number of users and their impact on the use of the beach park? No trailer parking appears to be provided.

Meandering Walkway

The walkways to be constructed at the Camp Kailua site are not clearly defined in the Draft EA. Are these walkways dirt, groveled or paved? Where do they lead? Do these walkways eliminate other potential uses of the "open space?" There is no discussion in the Draft EA that describes the walkway. The map is the only indication that they are even planning walkways for this area.

Accessible Fitness Equipment

The location of the Accessible Fitness Equipment at the Lanikai end of Kailua beach Park is troublesome given the location of the handicapped parking stalls at the Kaelepulu Stream end of the park. There is no discussion of the number and type of park users that will be using this equipment, what this equipment consists of, and the impact of this new use on the other areas of the park.

Picnic Sites

In this revised master plan, the Camp is replaced by several picnic sites. Existing picnic sites are currently under-utilized, as indicated by the attached study conducted during the summer months. By eliminating a service benefiting more than 20,000 people per year and replacing it with picnic tables, does the City feel it will service more people this way? The numbers of people currently picnicking anywhere at Kailua Beach Park are not substantiated in the Draft EA, nor is the need for additional picnic space discussed. The number of new picnic sites compared to the number of existing picnic sites is not addressed in the Draft EA nor is there any justification/rationale for additional picnic areas. Why was this use chosen over other uses?

Hiking Trail

The hiking trail at the Lanikai end of Kailua Beach Park is neither marked on the map nor discussed in the Draft EA. Where is the start and end of the hiking trail? As maintenance of hiking trails are normally a function of the State Department of Land and Natural Resources, will this hiking trail be State or City maintained? What impacts will hikers have on neighboring residences?

Bus Pullover on Alala Road

The conceptual drawing does not show the bus pullover on Alala Road. It is neither labeled nor discussed in the text of the Draft EA. The Draft EA should address traffic impacts from tour buses driving through or around Kailua Beach Park.

Realignment of Kailua Bikeway

Attached is a copy of the Special Management Use Area Permit, Resolution 94-180, approved by the City Council in December 1994, for the construction of the Kailua Bikeway. Prior to approval of the SMA, the Department of Transportation Services met with various members of the community to address their concerns over the siting of the bikeway and to establish its specific alignment. The City Council approved the SMA after we were assured that all community concerns had been addressed and implemented. It is unclear if this "realignment" changes the bikeway once again. If so, the City has realigned the bikeway without consulting the community, and is not making a good faith effort to involve the community in the planning process.

There is no text that addresses which portions of the bikeway will be realigned, and what the new bikeway will look like, and why it is being realigned after its SMA permit

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August 31, 1995

has already been finalized. Moving the bikeway further into the park area would seriously impact open space on the Lanikai side of Camp Kailua that could be used for a soccer practice field.

I recently read in the Windward Sun Press that the Administration has backed off on its plan to reroute the bikeway. Does this change the Master Plan?

If the Bikeway is not put out to bid by the City before December 31, 1995, the \$825,000 appropriated for it in fiscal year 1995 will lapse. A change in alignment may jeopardize the funding. No funding is provided in the next year's budget.

Economic Characteristics

Section 2.3, Economic Characteristics, states that the costs of all of these improvements is \$700,000. A breakdown of the costs of planning, design, and construction are not specified. What are the listed improvements and the cost for each? Also, this section does not explain what actual improvements will be done for this amount. It seems that the \$700,000 price tag is somewhat low considering that the cost to clear and landscape the area beneath the abandoned homes was \$300,000 alone. Surely the cost of realigning the entrance road to Kailua Beach Park and redesigning and rebuilding the first parking lot would exceed \$700,000.

A cost comparison is not done between the restoration of Camp Kailua and demolition of Camp Kailua with the "open space" improvements. The cost of providing alternate cabin camping sites would also be helpful to make appropriate comparisons about equal access to recreational opportunities.

Social and Recreational Characteristics

Section 2.2 presents the interesting argument that "the absence or presence of any facility serving both disabled and non-disabled populations affects both equally. Therefore, neither population is exclusively served nor penalized." This argument could surely be made for any of the changes and/or improvements proposed for the park. What is blatantly missing from this entire Draft EA are any explanations or justifications of the renovations chosen to be implemented and specific discussion about the impacts on the shoreline area. User numbers or some defensible explanation of pent-up need to justify these changes is critical.

Proposed Determination

Concerning the proposed determinations, I have the following comments:

- 1) The proposed destruction of Camp Kailua would have a major impact on the

resources of the beach park, eliminating a use that benefits over 20,000 people in any one year. Many of those individuals would have no chance to experience cabin-camping on the beach but for this facility.

- 2) The project does curtail the range of beneficial uses of the environment by eliminating cabin camping at the beach.
- 3) Chapter 344 of the Hawaii Revised Statutes establishes the state policy which "encourage(s) productive and enjoyable harmony between man and his environment... and stimulate(s) the health and welfare of man." §344-3 (2) (B) also state that it is the policy to create opportunities for the residents of Hawaii to improve their quality of life. By eliminating the only public handicapped accessible beach camping facility on the island, the City will be in conflict with those goals and guidelines.
- 4) The project substantially affects the social welfare of the community by denying access to beach cabin camping.
- 5) Public health will be affected by the unaddressed issues of deficient water quality at Kaelepulu Stream.
- 6) Substantial secondary impacts, such as the greater use of Kailua Beach Park due to the user cap at Hanauma Bay may occur. These impacts were neither addressed nor studied.
- 7) For project affects on the degradation of environmental quality, see #10.
- 10) Water quality of the water at Kaelepulu Stream may or may not worsen. However, the City must address ways to improve the high coliform bacteria levels in the water.
With the roadway being relocated, ambient noise levels from traffic will increase for the residents on Makalii Place. Traffic circulation and impacts were not explained nor addressed.
- 11) The project does affect the Kaelepulu Stream estuary. See #10 above.

Based upon the proceeding the Draft Environmental Assessment for the Revised Kailua Beach Park Master Plan must be substantially revised. The most egregious aspect of this EA is its total lack of discussion of the specific aspects of the project. There is a Master Plan Map that seems to indicate extensive renovations to the park but there is no justification or written description of the changes. There is no

Page Eight
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August 31, 1995

discussion of the impacts of the specific changes. Without these elements this EA is wholly inadequate and should be rejected as such.

Sincerely,



STEVE HOLMES
Councilmember, District II

Enclosures

xc: ✓ Dona Hanaike, Director
Department of Parks & Recreation

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR

ALVIN K. C. AU
DEPUTY DIRECTOR

January 10, 1996

The Honorable Steve Holmes
Councilmember
City Council
City and County of Honolulu
Honolulu, Hawaii 96813

Dear Councilmember Holmes:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your August 31, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

1. Apparent Realignment of Entry Road to Kailua Beach Park

An outdated version of the Master Plan drawing was inadvertently included in the Draft Environmental Assessment (DEA). The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

No change in vehicle circulation patterns is proposed and no tour bus parking will be allowed.

2. Commercial Windsurfing Operations

The Revised Master Plan exhibit depicts the ocean area currently reserved for windsurfing instruction.

The park access road will not be realigned. Hence there should be no impact on windsurfing operators and their park patrons.

Councilmember Steve Holmes
Page 2
January 10, 1996

3. Lifeguard Stations

The number and placement of lifeguard stands will be determined by water safety officers. Although one lifeguard station is depicted on the Master Plan, other stands will be placed at locations that provide satisfactory water safety coverage.

4. Revisions to First Parking Lot Fronting Existing Pavilion

The parking lot fronting the existing pavilion will not be redesigned.

5. Water Quality Issues Related to Kaelepulu Stream

Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities.

Debris from the park blown into the stream is collected and removed by parks maintenance personnel.

Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented during construction of the canoe halau:

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be lined with a geotextile filter fabric to retain sediment and debris.
- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

6. Canoe Halau

Canoe groups that presently use the stream have been requesting a canoe halau at this site for many years. The halau will be designed as an unenclosed, free standing structure of approximately 3,375 square feet (45' X 75'). The structure is about 15 feet in height and topped with a modified hip roof. The number of canoes to be stored at the

Councilmember Steve Holmes
Page 3
January 10, 1996

halau will be determined by the Department of Parks and Recreation. Use regulations will be promulgated at a later time.

The layout of parking to accommodate trailer access will be done during the design phase.

7. Destruction of Camp Kailua

Camp Kailua was used more often as a meeting place rather than as an overnight camping facility. The Kailua Recreation Center was expanded specifically to accommodate group use, primarily senior citizens who were the heaviest users of the camp facility for a meeting place. No one was deprived of a meeting place when Camp Kailua was closed.

There are at least nine different overnight camping facilities located elsewhere on Oahu that can accommodate a total of over 1,300 people. Thus, campers have ample alternative opportunities for camping. Further, although it was open to everyone, Camp Kailua was never designed nor built to standards for accommodating the specialized needs of the disabled; nor was it ever intended to be exclusively for use by the disabled. It is important to also realize that Camp Kailua has been closed to the public since 1991 and it is impossible to meaningfully assess impacts on various groups who have not been able to use the facility since that time.

The purpose of the Environmental Assessment is to evaluate impacts resulting from improvements to Kailua Beach Park. It is beyond the scope and intent of the Assessment to assess all social impacts on all groups when Camp Kailua is demolished.

The Department of Parks and Recreation has been charged with establishing beach and inland camping facilities on the island of Oahu. Towards this end, the Department has organized a task force to search for suitable sites for cabin camping facilities.

Waimanalo Bay Beach Park has been suggested as one site for Windward Oahu and the Department is examining another site on the North Shore. The site selection process does not include design work and cost estimates for building a facility. The DPR has been working with the School of Architecture at the University of Hawaii to design a cabin camping complex on about 20 acres of land in Waimanalo Bay Beach Park.

Councilmember Steve Holmes
Page 4
January 10, 1996

Demolition would not violate federal and state CZM law. The current SMA permit does not allow the City to demolish the buildings but Chapter 25, ROH, does not preclude the Department of Parks and Recreation from reapplying to the City Council for approval of demolition of the buildings.

A Special Management Area Permit is required for the overall project. As part of the SMA process, decision-makers will have to weigh the recreational value of expanding Kailua Beach Park area for the general public and the value of unused, dilapidated and deteriorating structures for recreational purposes.

8. Boat Ramp Maintenance

This project does not proposed any change in the existing boat ramp facility including its control, operation, maintenance, and type of craft now launched from the facility. The boat ramp is managed by the City and County of Honolulu.

9. Meandering Walkway

Approximately 2,000 lineal feet of walkways are proposed within City-owned properties. Walkways will be approximately 6-8 feet in width and constructed of hard surface material. Grades will be established in compliance with Americans with Disabilities Act (ADA) requirements.

Walkways will provide ADA access from the parking lot to various areas of the park and facilities as well as provide for passive strolling.

10. Accessible Fitness Equipment

Locating this facility near the parking lot may be convenient but may not provide the best environment for its use.

The fitness equipment is a series of exercise events for exercising and stretching different body parts. The non-movable, fixed in place equipments will be installed within a 2,000 square foot area (estimated at 40' X 50'). The fitness equipment consists in part of boards, benches, horizontal bars, and poles designed for events such as sit-ups, trunk stretch, and bench curls. Exercise events and equipment can be used by the general public including the disabled.

11. Picnic Sites

Approximately 15-20 new picnic sites are proposed. The new sites generally include concrete picnic tables, bench seating, barbecue units, and urns for disposing charcoal. The picnic sites, Kawaihoa Road parking lot, and other sections of the park will be connected by the meandering walkway.

The new picnic sites are for use by the public but will be designed for accessibility and use by persons with disabilities. ADA requires that all areas have some accessible tables and picnic facilities. They cannot be relegated to one area of the park.

12. Hiking Trail

A hiking trail is not part of the proposed project. An old trail that exists on the mauka side of Alala Point is still depicted and may one day be improved. However, improvement to this trail are not being planned or proposed at this time.

13. Bus Pullover on Alala Road

Bus pullovers are neither on park land nor under the jurisdiction of the Department of Parks and Recreation.

14. Realignment of Kailua Bikeway

The Master Plan shows a segment of the bikeway (approximately 200 lf) passing through the grounds of the former Camp Kailua site about 20 feet outside the right-of-way of Kawaihoa Road. The approved Special Management Permit for the bikeway placed this section along the edge of Kawaihoa Road. Placing this section of the alignment inside the park grounds is proposed for safe cycling purposes.

The Department of Parks and Recreation will consult with the Department of Transportation Services (DTS) about the change in alignment. If the conceptual realignment is approved by the City Council, the DTS will submit a "request for minor modification" to the approved Special Management Area permit for the bikeway.

The bikeway drawn on the Master Plan is a depiction of the general alignment and not intended to be a precise layout.

Councilmember Steve Holmes
Page 6
January 10, 1996

15. Economic Characteristics

Construction monies have not yet been appropriated. The \$700,000 is a preliminary estimate for the proposed improvements. Actual costs estimates will be refined to a line item level of detail during the design and engineering of the project. If additional funds are required, the Department will request funds through the City's CIP process. The cost for planning and engineering is estimated at \$100,000.00 and is in addition to the estimated construction cost.

Monies have not yet been appropriated to acquire, plan, and build new camping facilities. The Department of Parks and Recreation is searching for alternative locations for inland and beach camping facilities. Because a site or sites have not yet been selected, cost estimates of providing alternative camping sites are not yet available.

16. Social and Recreational Characteristics

Camp Kailua was used more often as a meeting place rather than as an overnight camping facility. The Kailua Recreation Center was expanded specifically to accommodate group use, primarily senior citizens who were the heaviest users of the

camp facility for a meeting place. No one was deprived of a meeting place when Camp Kailua was closed.

The purpose of the proposed improvements is to upgrade existing park facilities and provide facilities for use by persons with disabilities. In the case of the canoe halau, a needed facility is provided for canoeing activities. These improvements are intended to accommodate existing ocean and shoreline recreational needs of the public.

No work within the shoreline or shoreline setback area is proposed as part of this project.

Users at Kailua Beach Park totaled 679,385 during 1992-93 (State of Hawaii Data Book, 1994). This figure includes only people on the beach enumerated by lifeguard count; the number of actual park users is assumed to be greater than this figure.

17. Proposed Determination

After carefully reviewing all comments received during the environmental assessment process pertaining to the proposed

Councilmember Steve Holmes
Page 7
January 10, 1996

improvements, the Department of Parks and Recreation finds that the Proposed Determination in the Draft Environmental Assessment and determination of no significant environmental impact is still valid.

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

PACIFIC PARK PLAZA
711 KAPIOLANI BOULEVARD, SUITE 1200
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

CHARLES O. SWANSON
DIRECTOR

September 22, 1995

8/95-04042R

MEMORANDUM

TO: DONA L. HANAIKE, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: CHARLES O. SWANSON, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT FOR
KAILUA BEACH PARK REVISED MASTER PLAN

RECEIVED
1995 SEP 25 A 7:23
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

As requested in your August 10, 1995 memorandum, we have reviewed the subject environmental assessment and our comments are as follows:

1. We favor the realignment of the bikeway inside the park boundary which will enhance pleasant and safe cycling experience in the area.
2. There are no provisions for bicycle parking in Section 4.11 (Parking and Traffic) or the master plan (drawing). Thus, we suggest that bike racks be provided throughout the park, some near the beach and the volleyball court (see exhibit). We will coordinate provisions for bike parking racks when detailed plans are developed.
3. We have no objections to a Negative Declaration determination for this project.

Thank you for providing us with the opportunity to review the subject document. Should you have any questions regarding our comments, please contact Faith Miyamoto of the Transportation Systems Planning Division at Local 6976.

Enclosure

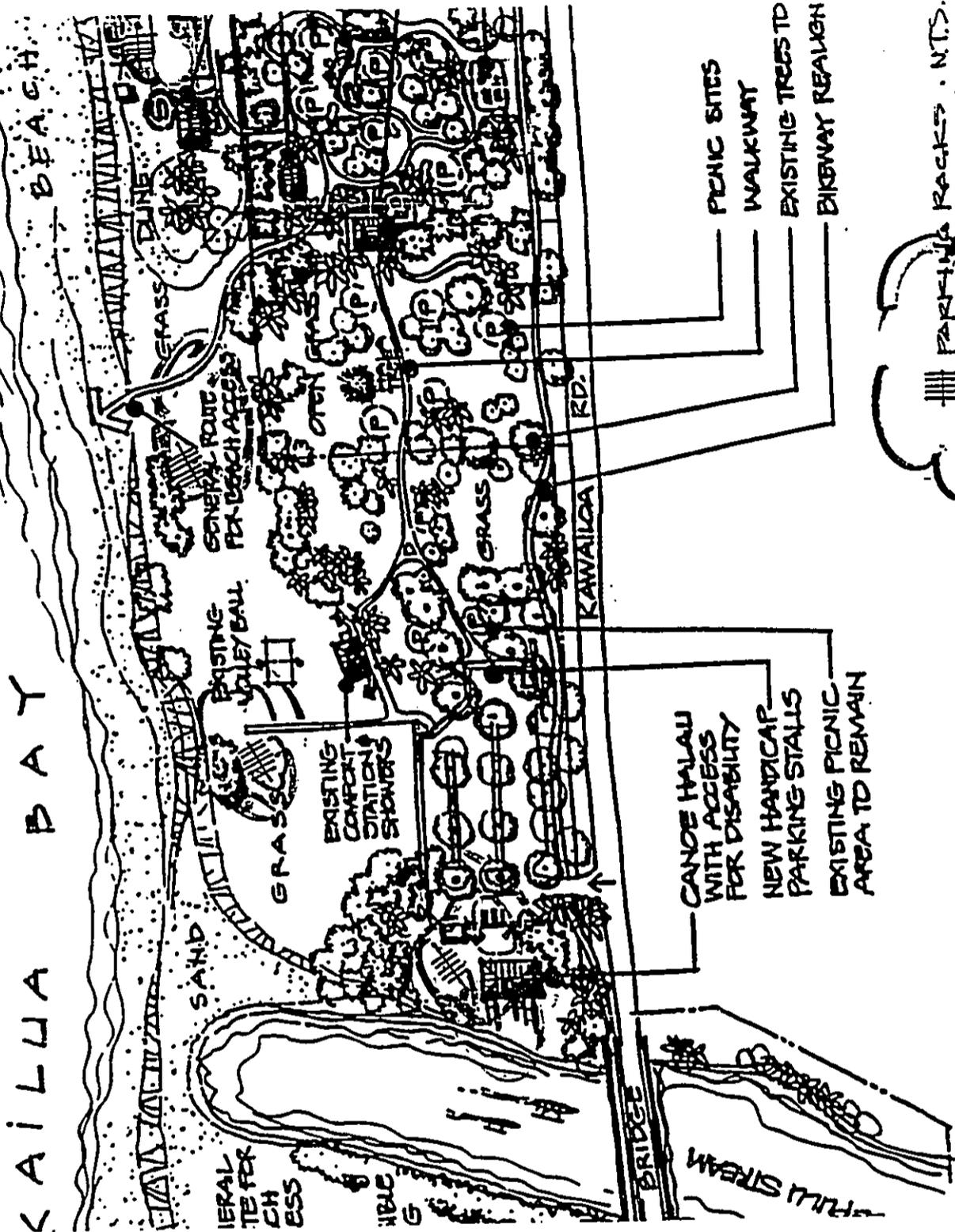
F. Miyamoto
For CHARLES O. SWANSON

05-2946
9/25/95

BOAT RA
BOATING ZONE

SWIMMING ZONE

KAILUA BAY



CANDOE HALAU
WITH ACCESS
FOR DISABILITY
NEW HANDICAP
PARKING STALLS
EXISTING PICNIC
AREA TO REMAIN

PICNIC SITES
WALKWAY
EXISTING TREES TO
BIKEWAY REAUGH

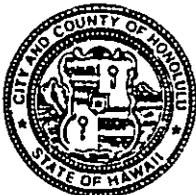
PARKING RACKS - N.T.S.
(Globe Loc.)



DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

TO: CHARLES O. SWANSON, JR., DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: DONA L. HANAIKE, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSEMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

Thank you for the comments in your September 22, 1995 memorandum concerning the Draft Environmental Assessment prepared for the subject project. In response to your comments we offer the following:

1. The Master Plan shows a segment of the bikeway (approximately 200 lf) passing through the grounds of the former Camp Kailua site about 20 feet outside the right-of-way of Kawaihoa Road. The approved Special Management Area Permit for the bikeway placed this section along the edge of Kawaihoa Road.

The Department of Parks and Recreation will consult with your department about the change in alignment. If the conceptual realignment is approved by the City Council, the Department of Transportation Services will have to submit a "request for minor modification" to the approved Special Management Area permit for the bikeway.

2. The Department of Parks and Recreation will consult with your department to identify suitable locations for bike parking racks.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at extension 6324.

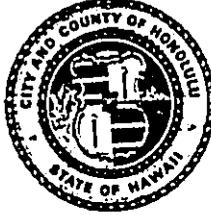
A handwritten signature in cursive script, reading "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei

HONOLULU PUBLIC TRANSIT AUTHORITY
CITY AND COUNTY OF HONOLULU

PACIFIC PARK PLAZA, SUITE 275
711 KAPIOLANI BOULEVARD
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

September 8, 1995

BOARD OF DIRECTORS
THEODORE G. JUNG
CHAIRMAN
PATTI O.L. IGAWA
VICE-CHAIR
DARRLYN T. BUNDA
RUSSELL W. MIYAKE
WILLIAM E. SPENCER, JR.
CHARLES O. SWANSON

MEMORANDUM

TO: DONA L. HANAIKE, DIRECTOR
DEPARTMENT OF PARKS & RECREATION

FROM: HOWARD K. TAKARA, ACTING EXECUTIVE DIRECTOR
HONOLULU PUBLIC TRANSIT AUTHORITY

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT FOR
KAILUA BEACH PARK REVISED MASTER PLAN

DEPT. OF PARKS
& RECREATION
C & C. DEPARTMENT

1995 SEP 11 P 3:56

RECEIVED

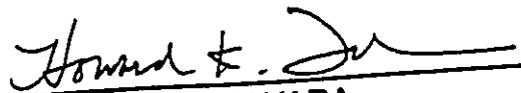
This is in response to the attached memorandum from DTS dated August 23, 1995, requesting our review and comments to the Draft Environmental Assessment for the Kailua Beach Park Revised Master Plan.

First of all, according to the schematic map following page 3 of the document, it seems that the accessible fitness equipment will be stored quite a distance away from the accessible parking spaces. Perhaps a few accessible spaces in the existing parking area on the beach side of the storage facility would resolve the situation.

Secondly, the report does not indicate where the existing bus stops are located; we therefore recommend that they be identified on the same map mentioned above.

Finally, if there are no adverse effects on bus scheduling, relocation of existing bus stops, or compromising of safety for the passengers boarding or alighting the BUS during the modification phase of Kailua Beach Park, we agree with your decision to issue a negative declaration determination.

We appreciate the opportunity to review the plan and request that all future plan reviews be sent to us directly. If there are any questions, please call Alvina Kubo of my staff at Local 4445.


HOWARD K. TAKARA

95-2588
9/11/95

Attachment
cc: DTS

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

TO: JAMES L. O'SULLIVAN, EXECUTIVE DIRECTOR
HONOLULU PUBLIC TRANSIT AUTHORITY

FROM: DONA L. HANAIKE, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

Thank you for the comments in your September 8, 1995 memorandum concerning the Draft Environmental Assessment prepared for the subject project. In response to your comments we offer the following:

1. Eight additional parking stalls for disabled persons are to be constructed in the parking lot off Kawailoa Road. Locating the fitness equipment near a parking lot may be convenient but may not provide the best environment for its use.
2. Bus stops are neither on park land nor under the jurisdiction of the Department of Parks and Recreation.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at extension 6324.

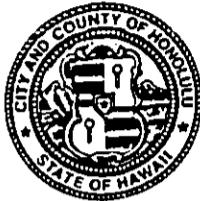
A handwritten signature in cursive script, reading "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE
DIRECTOR AND CHIEF ENGINEER

DARWIN J. HAMAMOTO
DEPUTY DIRECTOR
ENV 95-245

August 30, 1995

DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

1995 AUG 31 A 10: 07

RECEIVED

MEMORANDUM:

TO: DONA L. HANAIKE, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: *KS* KENNETH E. SPRAGUE
DIRECTOR AND CHIEF ENGINEER *Alex Ho*

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (DEA)
KAILUA BEACH PARK REVISED MASTER PLAN
TMK: VARIOUS

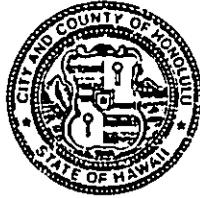
We have reviewed the subject DEA and have no comments to offer at this time.

Should you have any questions, please contact Mr. Alex Ho, Environmental Engineer, at Local 4150.

95-2664
8/31/95 AH

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

TO: KENNETH E. SPRAGUE, DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF PUBLIC WORKS

FROM: DONA L. HANAIKE, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We will keep your department apprised of improvements that may involve facilities under your jurisdiction.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at extension 6324.

A handwritten signature in cursive script, reading "Dona L. Hanaike".

DONA L. HANAIKE
Director

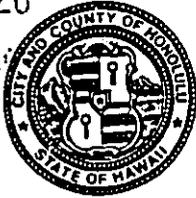
DLH:ei

95-05592-

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

1995 AUG 28 PM 3 20

JEREMY HARRIS
MAYOR



FELIX B. LIMTIACO
DIRECTOR

CHERYL K. OKUMA-SEPE
DEPUTY DIRECTOR

WPP 95-424

August 28, 1995

MEMORANDUM

TO: DONA L. HANAIKE, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: FELIX B. LIMTIACO, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT FOR
KAILUA BEACH PARK REVISED MASTER PLAN
TAX MAP KEYS 4-3-9: 1, 2
4-3-10: 83, 84, 88, 92-95, 101, 102
4-3-11: 59, 74-76

RECEIVED
1995 AUG 29 P 1:39
DEPT. OF PARKS
& RECREATION
CITY OF HONOLULU

We have reviewed the subject draft environmental assessment submitted by your letter of August 10, 1995, and find no significant impact on the wastewater system.

Should you have any questions, please contact Carl Arakaki of the Division of Planning and Service Control at extension 4671.

Cheryl K. Okuma-Sepe
FELIX B. LIMTIACO
Director

95-2044
0129195 JAO

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

TO: FELIX B. LIMTIACO, DIRECTOR
DEPARTMENT OF WASTEWATER MANAGEMENT

FROM: DONA L. HANAIKE, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We will keep your department apprised of improvements that may involve facilities under your jurisdiction.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at extension 6324.

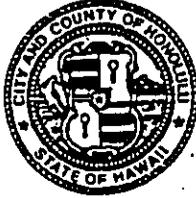
A handwritten signature in cursive script, reading "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH: ei

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 528-3111

JEREMY HARRIS
MAYOR



MICHAEL S. NAKAMURA
CHIEF

HAROLD M. KAWASAKI
DEPUTY CHIEF

OUR REFERENCE BS-DL

September 18, 1995

RECEIVED
1995 SEP 19 P 2:42
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

TO: DONA L. HANAIKE, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: MICHAEL S. NAKAMURA, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT FOR
KAILUA BEACH PARK REVISED MASTER PLAN
TAX MAP KEYS 4-3-9: 1, 2
4-3-10: 83, 84, 88, 92-95, 101, 102
4-3-11: 59, 74-76

This is in response to your memorandum of August 10, 1995, requesting comments on a draft environmental assessment for the Kailua Beach Park revised master plan.

This project should have no significant impact on the operations of the Honolulu Police Department.

Thank you for the opportunity to comment.

MICHAEL S. NAKAMURA
Chief of Police

By *Eugene Uemura*
for EUGENE UEMURA, Assistant Chief
Administrative Bureau

95-2880
9/19/95 AB

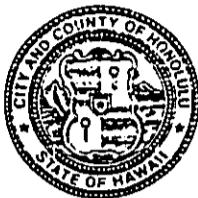
#115
9/20

2/

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

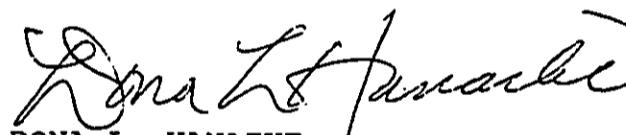
TO: MICHAEL S. NAKAMURA, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

FROM: DONA L. HANAIKE, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We will keep your department apprised of improvements that may involve operations of the Honolulu Police Department.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at extension 6324.


DONA L. HANAIKE
Director

DLH:ei



OFFICE OF STATE PLANNING

Office of the Governor

MAILING ADDRESS: P.O. BOX 3540, HONOLULU, HAWAII 96811-3540
STREET ADDRESS: 250 SOUTH HOTEL STREET, 4TH FLOOR
TELEPHONE: (808) 587-2848, 587-2800

BENJAMIN J. CAYETANO, Governor
FAX: Director's Office 587-2848
Planning Division 587-2824

Ref. No. C-1439

September 29, 1995

The Honorable Dona Hanaïke
Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

RECEIVED
1995 OCT -5 P 2:55
DEPT. OF PARKS
& RECREATION
C. & C. OF HONOLULU

Attention: Donald Griffin, Advance Planning Branch

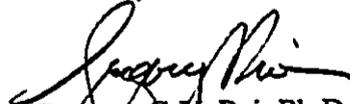
Dear Ms. Hanaïke:

This letter is in response to the draft environmental assessment ("EA") for the Kailua Beach Park Revised Master Plan ("Plan") relative to the Coastal Zone Management ("CZM") objectives and policies.

Generally, the Plan appears to advance a number of the CZM objectives and policies expressed in Chapter 205A, HRS, and thus is a positive contribution to the sound management of Hawaii's coastal resources. We wish to note, however, that since the draft EA does not explicitly discuss the plan's relationship with the CZM objectives and policies, we are unable to provide any substantive comments. Since Plan implementation will require a Special Management Area ("SMA") Use Permit, which requires an explicit consideration of the project's impact on the CZM objectives and policies, we recommend that this relationship be fully discussed in the final EA. Disclosure of all environmental and resource information during the EA process will facilitate the comprehensive analysis of the project when it is submitted for SMA permit processing.

Thank you for the opportunity to comment on this project. If you have any questions regarding this letter, please contact Tom Eisen of our CZM Program at 587-2877.

Sincerely,

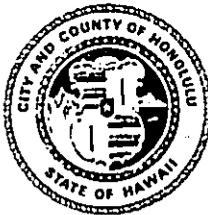

Gregory G. M. Pai, Ph.D.
Director

95-3085
10/6/95

#121
10/9

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Gregory G. Y. Pai, Ph.D.
Director
Office of State Planning
State of Hawaii
250 South Hotel Street
Honolulu, Hawaii 96813

Dear Dr. Pai:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 29, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

Recreational Resources

The demolition of the former Camp Kailua buildings and the proposed recreational improvements envisioned by the Department of Parks and Recreation for Kailua Beach Park are consistent with this objective. The proposed improvements will provide an enhanced recreational experience for park users by adding more open space and alleviating overcrowded conditions. In addition, the improvements will provide increased access to the ocean for disabled persons.

Scenic and Open Space Resources

The demolition of the former Camp buildings and installation of picnic sites with landscaping will greatly improve the scenic beauty of Kailua Beach Park. The proposed pavilion and canoe halau are intended to be low-rise structures which will not interfere with or detract from the line of sight toward the park from Kawaihoa Road.

Coastal Ecosystems

No wildlife habitats or endangered flora are located within Kailua Beach Park. The park is located within an urbanized area developed for residential use. Vegetation on the sites

Dr. Gregory Pai
Page 2
January 10, 1996

to be improved consist primarily of grasses, shrubs, and trees.

Coastal Hazards

The sites proposed for park improvements are within Flood Zone X on the Federal Flood Insurance Rate Map. Zone X is an area that is not subject to the Flood Hazard District regulations of the Land Use Ordinance.

Historic Resources

There are no known historic or archaeological sites in Kailua Beach Park.

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp

BENJAMIN J. CAYETANO
Governor of Hawaii



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

REF:OCEA:TES

P. O. Box 621
Honolulu, Hawaii 96809

FILE NO.: 96-086

OCT 10 1995

The Honorable Dona L. Hanaike, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Hanaike:

SUBJECT: Draft Environmental Assessment (DEA): Kailua Beach
Park Revised Master Plan, Kailua, Oahu, TMKs: 4-3-09:
1, 2; 4-3-10: 83, 84, 88, 92-95, 101, 102; 4-3-11: 59,
74-76

We have reviewed the DEA information for the subject project transmitted by your letter dated August 15, 1995, and provide the following:

Historic Preservation Division

Our Historic Preservation Division (HPD) comments were previously forwarded by their letter dated August 29, 1995. In that letter, HPD stated that they have no record of any historic sites at the project location and that a reconnaissance survey conducted in the late 1970s did not locate any historic sites or cultural deposits. HPD also noted that this beach park is situated on recently accreted portions of Kailua Bay where it is unlikely that historic sites would be found. Therefore, HPD believes that this project will have "no effect" on historic sites.

Should historic sites, including human burials, be found during routine construction activities, all work in the vicinity must stop, and the Historic Preservation Division must be contacted.

Division of Aquatic Resources

Our Division of Aquatic Resources (DAR) comments that no significant impact to aquatic resource values is expected from the proposed activities. However, precautions should be taken, especially for landscaping activities seaward of the shoreline setback, to prevent demolition debris, eroded soils, petroleum products, landscaping chemicals/fertilizers and other potential contaminants, from entering Kailua Bay.

Chairperson
MICHAEL D. WILSON
Board of Land and Natural Resources

Deputy Director
GILBERT COLOMA-AGARAN

Aquaculture Development
Aquatic Resources
Boating and Ocean Recreation
Bureau of Conveyances
Conservation and Environmental Affairs
Conservation and Resources Enforcement
Forestry and Wildlife
Historic Preservation
Land Management
State Parks
Water and Land Development

RECEIVED
1995 OCT 11 A 8:49
DEPT. OF PARKS
& RECREATION
C. & C. OF HONOLULU

05-3126
10/11/95

Ms. D. Hanaike

- 2 -

File No.: 96-086

We have no other comments to offer at this time. Thank you for the opportunity to comment on this matter.

Please feel free to call Steve Tagawa of our Office of Conservation and Environmental Affairs 587-0377, should you have any questions.

Aloha,

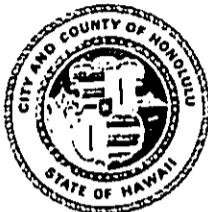


MICHAEL D. WILSON

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K. C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Michael D. Wilson, Chairperson
Board of Land and Natural Resources
Department of Land and Natural Resources
State of Hawaii
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Wilson:

Subject: Revised Master Plan for Kailua Beach Park
Draft Environmental Assessment

Thank you for the comments in your October 10, 1995 letter concerning the Draft Environmental Assessment prepared for the subject project. In response to your comments we offer the following:

1. We will comply with the stop work and reporting requirements if historic features are found during construction.
2. No improvements are proposed seaward of the shoreline. As you suggest, we will take precautions to prevent eroded soils, pollutants, construction debris, and other contaminants from entering Kailua Bay.

Thank you for participating in the environmental review process. If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dona L. Hanaike", is written over the typed name.

DONA L. HANAIKE
Director

DLH:ei

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 8TH FLOOR
HONOLULU, HAWAII 96813

August 29, 1995

Dona L. Hanaïke, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

MICHAEL D. WILSON, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES

DEPUTY
GILBERT COLOMA-AGARAN

AQUACULTURE DEVELOPMENT
PROGRAM

AQUATIC RESOURCES
CONSERVATION AND

ENVIRONMENTAL AFFAIRS
CONSERVATION AND
RESOURCES ENFORCEMENT
CONVEYANCES

FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
DIVISION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

LOG NO: 15311 ✓
DOC NO: 9508EJ38

Dear Ms. Hanaïke:

SUBJECT: Draft Environmental Assessment (DEA) for Kailua Beach Park Revised Master Plan
Kailua, Ko'olaupoko, O'ahu
TMK: 4-3-9:1,2; 4-3-10: 83,84,88,92-95,101,102;
4-3-11:59,74-76

Thank you for the opportunity to review the DEA for the Kailua Beach Park Revised Master Plan. A review of our records shows that there are no known historic sites at the project location. An archaeological reconnaissance survey conducted in the late 1970s did not locate any historic sites or cultural deposits. Kailua Beach Park is situated on a recently accreted portion of Kailua Bay where it is unlikely that historic sites will be found. Therefore, we believe that this project will have "no effect" on historic sites.

The DEA states that in the event that historic sites, including human burials are found during routine construction activities, all work in the vicinity will stop and the Historic Preservation Division will be contacted.

Aloha,


DON HIBBARD, Administrator
Historic Preservation Officer

EJ:jk

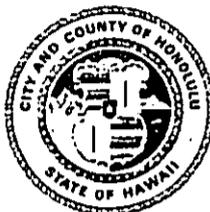
RECEIVED
1995 SEP - 6 P 2:51
DEPT. OF PARKS
& RECREATION
OFFICE OF HISTORIC PRESERVATION

95-2736
9/6/95

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Don Hibbard, Administrator
State Historic Preservation Division
Department of Land and Natural Resources
State of Hawaii
33 South King Street, 6th Floor
Honolulu, Hawaii 96813

Dear Mr. Hibbard:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your August 29, 1995 letter concerning the Draft Environmental Assessment prepared for the subject project. We concur that the project will have "no effect" on historic sites.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dona L. Hanaike", is written over a horizontal line.

DONA L. HANAIKE
Director

DLH:ei

BENJAMIN J. CAYETANO
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAZU HAYASHIDA
DIRECTOR

DEPUTY DIRECTORS
JERRY M. MATSUDA
GLENN M. OKIMOTO

IN REPLY REFER TO:

HWY-PS
2.7070

AUG 30 1995

RECEIVED
1995 SEP - 1 A 10:19
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

Ms. Dona L. Hanaïke, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Hanaïke:

Subject: Draft Environmental Assessment, Kailua Beach Park
Revised Master Plan, Kailua, Oahu
TMK: 4-3-9; 4-3-10; 4-3-11

Thank you for providing the subject project's draft environmental assessment for our review.

The proposed improvements to Kailua Beach Park will not impact our State highway system.

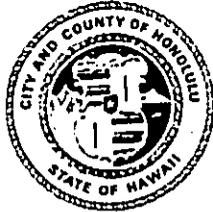
Very truly yours,

KAZU HAYASHIDA
Director of Transportation

95-2680
9119590

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
850 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Kazu Hayashida, Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Hayashida:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We will keep the Department of Transportation apprised of improvements that may affect facilities under your jurisdiction.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



LAWRENCE MIIKE
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:

September 7, 1995

95-159/epo

Ms. Dona L. Hanaïke, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

RECEIVED
1995 SEP 14 A 8:04
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

Dear Ms. Hanaïke:

Subject: Draft Environmental Assessment

Project Name: Kailua Beach Park Revised Master Plan
Location: Kailua, Oahu
Tax Map Key: 4-3-09: 1 & 2, 4-3-10: 83, etc.,
4-3-11:59, 74-76

Thank you allowing us to review and comment on the subject document. We have the following comments to offer:

Vector Control

As stated in the Hawaii Administrative Rules, Chapter 11-26, "Vector Control," Section 11-26-35:

Rodents; demolishing of structure and clearing of sites and vacant lots. No person, firm, or corporation shall demolish or clear any structure, site, or vacant lot without first ascertaining the presence or absence of rodents which may endanger the public health by dispersal from such premises.

(b) Should such inspection reveal the presence of rodents, the person, firm, or corporation shall eradicate the rodents before demolishing or clearing the structure, site, or vacant lot.

If you have any questions, please call Mr. Gary Toyama of the Vector Control Branch at 831-6767.

Sincerely,

Lawrence Miike
Director of Health

c: VC

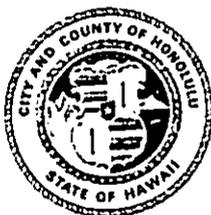
95-2828
9/14/95 JMB

#112

58.

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Lawrence Miike, M.D., J.D.
Director of Health
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Dr. Miike:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 7, 1995 letter concerning the Draft Environmental Assessment prepared for the subject project. The Department of Parks and Recreation will comply with the vector control information specified in your comment letter.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei

JAMIN J. CAYETANO
GOVERNOR



GARY GILL
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
220 SOUTH KING STREET
FOURTH FLOOR
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-2452

September 11, 1995

RECEIVED
SEP 14 1995
10:01 AM
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

Ms. Dona L. Hanaïke, Director
Department of Parks and Recreation
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Hanaïke,

Subject: Draft Environmental Assessment for the Kailua Beach Park
Revised Master Plan

Thank you for the opportunity to review the subject document. We have the following comments.

- 1) The Kaelepulu Stream estuary contains too much coliform bacteria to meet State water quality standards. What is the impact of this poor water quality on nearshore recreation? How does the City plan to manage and maintain Kaelepulu Stream and its associated watershed to improve water quality?
- 2) The realignment of the entry road to Kailua Beach Park off of Kailua Road is not described in the text of the draft environmental assessment. Since a drawing of the existing condition is not provided, it is not clear that the road is being realigned. Please describe all the proposed changes in as much detail as possible and provide a drawing which shows the existing condition of Kailua Beach Park.
- 3) Please discuss in detail the alternative of relocating cabin camping to another site. Have any sites been considered as a replacement for Camp Kailua? When would these new cabins be implemented?

If you have any questions, please call Jeyan Thirugnanam at 586-4185. Mahalo.

Sincerely,

Gary Gill
Director

95-2831
9/14/95 JAG

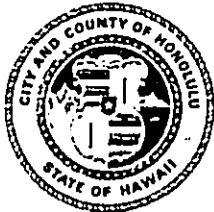
9/15

9/15

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Gary Gill, Director
Office of Environmental Quality Control
State of Hawaii
220 South King Street, Suite 400
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 11, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

1. Water Quality

Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities.

Debris from the park blown into the stream is collected and removed by parks maintenance personnel.

Promulgation of water quality management policies in the watershed area is beyond the scope of the Environmental Assessment.

2. Realigned Entry Road

An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

Mr. Gary Gill
Page 2
January 10, 1996

No change in vehicle circulation is proposed. The proposed changes or improvements to Kailua Beach Park are described in the Environmental Assessment. A drawing depicting existing conditions of Kailua Beach Park is included in the Final Environmental Assessment.

3. Cabin Camping Alternatives

The Department of Parks and Recreation has been charged with establishing beach and inland camping facilities on the island of Oahu. Towards this end, the Department has organized a task force to search for suitable sites for cabin camping facilities.

Waimanalo Bay Beach Park has been suggested as one site for Windward Oahu and the Department is examining another site on the North Shore. The site selection process does not include design work and cost estimates for building a facility. The DPR has been working with the School of Architecture at the University of Hawaii to design a cabin camping complex on about 20 acres of land in Waimanalo Bay Beach Park.

Monies have not yet been appropriated to acquire, plan, and build new camping facilities. The Department of Parks and Recreation is searching for alternative locations for inland and beach camping facilities. Because a site or sites have not yet been selected, cost estimates of providing alternative camping sites are not yet available.

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp



COMMISSION ON PERSONS WITH DISABILITIES

919 Ala Moana Boulevard, Room 101 • Honolulu, Hawaii 96814
Ph. (808) 586-8121(V/TDD) • Fax (808) 586-8129

September 12, 1995

RECEIVED
1995 SEP 14 P 1:51
DEPT. OF PARKS
& RECREATION
CITY AND COUNTY OF HONOLULU

The Honorable Dona L. Hanaïke
Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Regarding: Draft Environmental Assessment for Kailua Beach Park Revised
Master Plan

Dear Ms. Hanaïke,

The Commission on Persons with Disabilities has reviewed the proposed Draft Environmental Assessment for Kailua Beach Park. We note the recommendation to issue a negative declaration determination. Upon review of the plan, we have no objections to the recommendation.

Sincerely,


HELEN YOUNG
Chairperson

95-28307
9/14/95

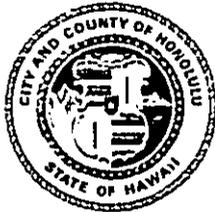
114
9/15

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9/18

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K. C. AU
DEPUTY DIRECTOR

January 10, 1996

Ms. Helen Young, Chairperson
Commission on Persons With Disabilities
Department of Health
State of Hawaii
919 Ala Moana Boulevard, Room 101
Honolulu, Hawaii 96814

Dear Ms. Young:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We will keep the Commission on Persons with Disabilities apprised of proposed improvements for compliance with the Americans for Disabilities Act.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei



University of Hawaii at Manoa

Water Resources Research Center
Holmes Hall 283 • 2540 Dole Street
Honolulu, Hawaii 96822

15 September 1995

Ms. Dona L. Hanaïke, Director
Department of Parks and Recreation
City and County of Honolulu
Honolulu, Hawaii 96813

RECEIVED
1995 SEP 20 P 1:37
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

Dear Ms. Hanaïke:

Subject: Draft Environmental Assessment, "Revised Master Plan
for Kailua Beach Park, Kailua, Koolaupoko, Oahu,
Hawaii"

We have reviewed the subject Draft Environmental Assessment
and have no comments to offer at this time.

Thank you for the opportunity to comment.

Sincerely,


Roger S. Fujioka, Ph.D.
Director, WRRC

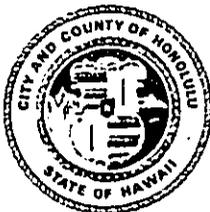
RSF:jmn

95-2905
9/20/95 JMO

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Roger S. Fujioka, Ph.D., Director
Water Resources Research Center
University of Hawaii at Manoa
2540 Dole Street
Holmes Hall 283
Honolulu, Hawaii 96822

Dear Dr. Fujioka:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project and participating in the environmental assessment review process.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

A handwritten signature in cursive script, reading "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei



University of Hawai'i at Mānoa

Environmental Center
A Unit of Water Resources Research Center
Crawford 317 • 2550 Campus Road • Honolulu, Hawai'i 96822
Telephone: (808) 956-7361 • Facsimile: (808) 956-3980

September 22, 1995
EA:0131

Ms. Dona Hanaïke
City and County of Honolulu
Department of Parks and Recreation
650 South King Street
Honolulu, Hawaii 96813

RECEIVED
1995 SEP 28 AM 11:22
DEPT. OF PARKS
& RECREATION
CITY OF HONOLULU

Dear Ms. ^{Dona}Hanaïke:

Draft Environmental Assessment Kailua Beach Park Revised Master Plan Kailua, Oahu

This revised master plan for Kailua Beach Park includes several modifications, including demolition of Camp Kailua buildings, construction of a new pavilion and canoe halau, new picnic area, pedestrian walkways, realignment of the bikeway surrounding the park and modifications to existing facilities to provide improved accessibility to the beach park and its facilities. All physical improvements to the beach park will be designed for equal accessibility in accordance with the standards of the Americans with Disabilities Act. The interior floor space of the existing pavilion at the beach park will be expanded to accommodate a storage area for surf chairs and the new canoe halau will be constructed near the banks of the Kaelepulu Stream at the present canoe storage area next to the parking lot.

This review was completed with the assistance of Peter Rappa, Sea Grant; and Tom Hawley, Environmental Center.

We support the effort of the City and County of Honolulu to improve and maintain beach parks on Oahu. In particular, we are pleased that the City and County of Honolulu is making an effort to improve and maintain Kailua Beach Park. Enhancement of one of Oahu's best beach parks is an investment in the quality of life of Oahu residents, particularly those on the Windward side. This is a refreshing break from the frequent emphasis on tourist-oriented Leeward-side beach parks. Nevertheless, there are several issues surrounding the Master Plan which require additional attention before work begins.

95-3016
9/28/95 *etc.*

Ms. Dona Hanaike
September 22, 1995
Page 2

Camp Kailua

A significant issue concerning the Kailua Beach Park Master Plan is the extent of public opposition to the proposed project, particularly those elements of the plan which entail demolition of Camp Kailua. Given the long history of strident community opposition to this aspect of the plan, it is clear that the perceived efficacy of the public input process could be at stake here. It is important to avoid impinging upon this process by simply proceeding with the plan as written without a good-faith effort to address community concerns.

The draft EA devotes only superficial attention to the issue of community opposition via a one paragraph statement on page 5 which relates objections to Camp demolition solely to issues of disabled persons' accessibility. Yet even a cursory following of the popular media throughout the last several years reveals that opposition to demolition of the Camp extends far beyond disabled park users. Prior legal actions and settlements relating to Camp Kailua have addressed issues of capacity, busing and general planning intentions of the City which are in conflict with community preferences. Omission of community concerns from the draft EA presents three problems for the document: first, it inhibits a sustained consideration of alternatives or mitigative measures that might be taken in place of demolishing Camp Kailua. Clearly, the problem won't simply disappear in the absence of discussion; proactively engaging the community on this issue is a far better approach. Second, failing to include such issues in the document violates Department of Health regulations governing EA preparation, specifically section 11-200-10 (4), which requires a "General description of the action's technical, economic, *social* and environmental characteristics" [emphasis added]. Third, there is an implication that absence of attention to community concerns regarding Camp Kailua means that these concerns have been adequately mitigated. If so, such resolution needs to be explicitly stated in the draft EA. If not, then community opposition should not be treated as though it does not exist.

Our reviewers wonder whether another rationale for demolition of Camp Kailua relates to City and State policy agreements. On pages 5 and 6, the draft EA states:

Furthermore, lack of a cabin camping facility on a city beach park is consistent with the division of responsibility between the City and the State regarding management and use of park resources. The counties generally acquire and manage active recreational areas, including beach parks; and the State manages conservation areas, large passive-type parks, and cabin camping. Despite this policy, there is sentiment, recently expressed by the Honolulu City Council by ordinance, that the City should provide cabin camping at both beach and inland locations.

Ms. Dona Hanaike
September 22, 1995
Page 3

Immediately after acknowledging this "sentiment," however, the draft EA goes on to state on page 6 that ". . . cabin camping is incompatible with the recreational uses of Kailua Beach Park . . ." Thus, it is unclear from the draft EA why the option of demolishing Camp Kailua has been chosen and whether a City ordinance or a "general" agreement between the City and the State will take precedence.

Our concern lies primarily with how such determinations of "compatibility" are reached. If a formal agreement between the State and the City is the operative rationale behind Camp demolition, then the draft EA should explicitly state this and include specific citations to relevant sections. If, however, the agreement which underwrites removal of Camp Kailua is merely a tacit one, then justifiable objections can be raised as to the fairness of such a decision-making process regarding recreational resources. Are there any guarantees that such a policy will not change at some future indeterminate point? Has the public been given the opportunity to review and comment upon such an agreement? These issues need to be far more explicit in the draft EA if they are being used to justify various elements of the Kailua Beach Park Master Plan.

Finally, a sustained consideration of possible alternatives to demolishing the entire Camp is absent from the draft EA. While the option of retaining one building for water safety officers and the parking lot for increased visitor loads is mentioned (page 16), the draft EA states that this option was abandoned due to lack of support in the City Council. However, given that the City Council is part and parcel of the same government which is proposing the beach park project, it is disingenuous at best to simply dismiss a possible alternative because it fared poorly in a Council vote. Was community input a part of the Council's deliberations? Was the possibility of retaining one or more buildings for community meeting space raised? Decision-making and allocation of public resources are best made under circumstances other than the zero-sum options presented in this draft EA. We believe that the sustained discussion missing from this draft EA of alternatives to the destruction of Camp Kailua could enhance the quality of decision-making and prevent the development of a climate of distrust between the City and Kailua-area residents.

Information Sources and Justification

The draft EA contains a number of statements and claims which either lack specific references and citations or are too brief to warrant the conclusions which follow.

2.1.4 Utility Requirements: Page 4 of the draft EA contains the statement "Landscape irrigation will be extended from the existing park irrigation system." Given that irrigation entails the use of a freshwater source and the management of surface and groundwater runoff, a more detailed explanation of how and where the landscape irrigation system will be implemented should be included in the draft EA.

Ms. Dona Hanaike
September 22, 1995
Page 4

4.4 Water Quality: The draft EA states on page 9 that "Because of the nature and composition of inland runoff and poor circulation, the Kaelepulu Stream estuary often naturally contains too much coliform bacteria to meet State water quality standards. This affects the nearshore water quality in the vicinity of the stream whenever the stream mouth is opened and its waters drain into Kailua Bay." Clearly, poor water quality in any area visited by thousands of people should warrant sustained attention. In combination with an expected increase in park visitors as a result of the proposed project, water quality problems in the area surrounding Kaelepulu Stream clearly warrant more attention than one paragraph in the draft EA. We take strong exception to this cavalier attitude toward poor water quality and its attendant bearing on public safety. In its place, we advocate a detailed consideration of the scope, history, characteristics, and health concerns associated with the water quality degradation, as well as specific discussion of short- and long-term mitigation options.

4.5 Natural and Man-Made Hazards and Nuisances: Page 9 of the draft EA states that "The park is not at risk from air pollution, noise, flooding, subsidence, or long-term beach retreat . . ." This statement is critically erroneous: the park lies entirely within the tsunami inundation area as designated by Hawaii State Civil Defense. Regarding beach retreat, the draft EA needs to be far more detailed. Kailua Beach is currently undergoing sustained sand accretion. This is most clearly evident on the makai side of Camp Kailua, where the accumulation of large amounts of sand has nearly completely buried the fence which surrounds the Camp. On the other hand, portions of the beach, especially near the boat ramp, have in the past experienced extensive beach erosion, requiring manual deposition of sand in the area to restore the beach. Thus, for the EA to suggest that the beach area is not subject to long-term retreat belies physical evidence at the site which suggests that Kailua Beach is not stable, but is in fact subject to recurrent periods of accretion and erosion.

5.1.2 Water Drainage and Water Quality: On page 13, the draft EA states that "Because the canoe halau will be constructed near Kaelepulu Stream, erosion control precautions will be taken as required by law to minimize risk of runoff." The draft EA should include more specific mention of these precautions by detailing what they are and how they will be used.

5.1.3 Hazards, Nuisances and Aesthetics: Page 13 of the draft EA states that ". . . construction of new facilities in the park will temporarily generate noise and dust." A more sincere attempt should be made to determine and describe the actual length of time this noise and dust will be generated.

Ms. Dona Hanaïke
September 22, 1995
Page 5

5.1.7 Construction Activities: Page 17 of the draft EA states that "Industry standard practice will be followed to minimize the impact of construction work on surrounding residences, environment and park users." Again, some elaboration of precisely what "industry standard practice" means should be included in the draft EA.

Section 7: Proposed Determination: Item three on page 17 claims that the project does not ". . . conflict with the State's long-term environmental policies or goals and guidelines in Chapter 344, HRS . . ." While this may be true, the draft EA lacks any mention of what these policies, goals and guidelines are, thus leaving the public to speculate as to whether in fact this claim is accurate. Item five states that "Public health is not substantially affected by this project." However, waters adjacent to and passing through the park are known to be contaminated periodically. Thus, exposure to pathogens is probable, and this claim is erroneous. Item six in this same section claims that "The project will not have any substantial secondary impact." Again, without any information or justification to back up such a large claim, the ability to either assess or question such a judgment is absent from this draft EA. Given that this is a public disclosure document, more information should be provided on this important topic. Finally, in item 11, as noted earlier, the project is entirely within a tsunami inundation area and a negative response to this item is patently false.

Park Capacity

As a broader, more general concern, we find the draft EA to be missing a substantial amount of many necessary details required for the assessment of the proposed project. Section 1, for example, lists a number of proposed actions within the park, including the construction of a new pavilion, the construction of a new canoe halau and the addition of handicapped parking spaces. Yet nowhere in the document are specific plans given for any new construction, nor are figures provided regarding the actual number of new parking spaces planned. Similarly, the draft EA anticipates an increase in users but fails to consider precisely how many additional users are expected to visit Kailua Beach Park. Clearly the park is at capacity now. How many more users does the City expect as a result of these proposals? Can the park handle such an increase even with improvements to the site? The absence of such information makes assessing the impacts of the proposed project very difficult. Similarly, the argument that the plan entails no significant or long-term impacts is equally suspect in the absence of these crucial assessment data.

Proposing Agency Versus Accepting Authority

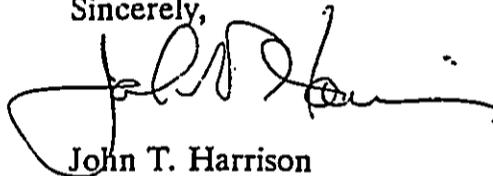
Finally, we are very concerned that the City and County of Honolulu Department of Parks and Recreation is both the proposing agency and the accepting authority for the proposed project. This clearly represents a conflict of interest and we suspect that some of the problems and absences within this draft EA could be the result of such overlap.

Ms. Dona Hanaïke
September 22, 1995
Page 6

Certainly, the process of objective review is ill-served by such a situation. Public concerns regarding any project must be allowed a fair hearing in as neutral a forum as possible and must be given an honest chance to be addressed. The current situation compromises that possibility.

Thank you for this opportunity to comment.

Sincerely,

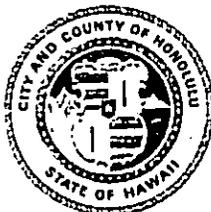


John T. Harrison
Environmental Coordinator

cc: OEQC
Department of Parks and Recreation ✓
Roger Fujioka
Peter Rappa
Tom Hawley

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

John T. Harrison, Ph.D.
Environmental Coordinator
Environmental Center
University of Hawaii at Manoa
2550 Campus Road, Crawford 317
Honolulu, Hawaii 96822

Dear Dr. Harrison:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 22, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

Camp Kailua

The proposed improvements will add accessible features to the park. Since 1982, when the city first purchased the Camp Kailua land, the stated purpose for its acquisition was for more open park space for use by the general public. It was on that basis that money was appropriated and spent to acquire the land.

2.1.4 Utility Requirements

Landscape irrigation systems will be installed in areas of the park which are now lacking an automatic irrigation system. This would include the new picnic areas and existing lawn areas.

4.4 Water Quality

Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities.

Dr. John T. Harrison
Page 2
January 10, 1996

Debris from the park blown into the stream is collected and removed by parks maintenance personnel.

4.5 Natural and Man-Made Hazards and Nuisances

The Department of the Army in their comment letter dated August 22, 1995 indicated "the flood hazard information presented on page 7 of the environmental assessment is correct."

Detailed information about beach retreat is not needed. No work within the shoreline or shoreline setback area is proposed as part of this project.

5.1.2 Water Drainage and Water Quality

During construction of the canoe halau, Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented.

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be lined with a geotextile filter fabric to retain sediment and debris.
- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

5.1.3 Hazards, Nuisances and Aesthetics and 5.1.7 Construction Activities

Demolishing the existing structures at Camp Kailua and clearing the site of debris should take about 30 days. Demolition activities will raise fugitive dust, create noise, and intermittently impede traffic on nearby roads as debris is hauled away from the site. Prior to demolition, a hazardous material assessment will be conducted. If hazardous materials are discovered in the building materials or on the premises, they will be removed by licensed hazardous waste contractors. Construction debris will be hauled to Waimanalo Gulch or a private disposal site in Nanakuli.

Fugitive dust can and will be controlled by sprinkling water over debris and exposed areas or by the application of other

Dr. John T. Harrison
Page 3
January 10, 1996

dust suppression measures stipulated in Chapter 60 (Air Pollution Control) of Title 11, Administrative Rules of the State Department of Health.

Construction noise will be most pronounced during demolition and clearing and pouring of the concrete building pads for the halau and pavilion.

Allowable daytime noise levels by zoning district is set by the State Department of Health. The allowable daytime noise level is 55 dBA for parks measured at the property line. Construction work will temporarily exceed this standard and, per Administrative Rules (Chapter 43) of the Department of Health, the Contractor will obtain a noise permit prior to construction. Construction will be limited to normal working hours of between 7:00 a.m. and 3:30 p.m. five days a week.

Vegetation will be removed to make way for the proposed improvements. In the event prominent trees are adversely affected by an improvement or construction vehicles, the trees will be flagged for removal and replanting elsewhere on the premises or relocated to another city project. Green waste will be transported to Barbers Point for recycling or disposal by a private contractor.

Adverse impacts on vehicle circulation are not anticipated. No work in the road right of way is anticipated thus there should be no need to reroute through traffic on roads adjoining the park. In addition, most of the construction work will take place on-site and the movement of men and materials will be scheduled for non-peak traffic hours.

Section 7: Proposed Determination

After carefully reviewing all comments received during the environmental assessment process pertaining to the proposed improvements, the Department of Parks and Recreation finds that the Proposed Determination in the Draft Environmental Assessment and determination of no significant environmental impact is still valid.

Park Capacity

This project does not warrant a study of carrying capacity. None of the proposed improvements are intended to increase users of the park.

Dr. John T. Harrison
Page 4
January 10, 1996

Proposing Agency Versus Accepting Authority

The DPR is the City agency most capable of evaluating recreation type improvements. The proposed action does not entail significant public works projects, wastewater or transportation improvements, and land use changes. If non-recreation improvements were proposed, then the accepting authority would have been another city agency.

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

September 22, 1995

Dona Honaike, Director
Department of Parks and Recreation
Honolulu Municipal Bldg.
650 S. King Street
Honolulu, HI 96813

RECEIVED
1995 SEP 22 P 3:47
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

SEP 22 1995 15 32 No.004 P.01

Re: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

PAVILION: "The new physical features will include an open air pavillion...to be roofed to provide shade and protect against rain." (pg. 3)

"Why do we need to build a new pavillion here? If it is rainy people go home. There are lots of trees to provide shade at little cost..."

"The existing meeting hall at Camp Kailua with tables and a small camp kitchen is very appropriate for small groups to gather for a variety of Parks and Recreation programs, special programs for teenagers, seniors, etc."

"The interior floor space...." (pg. 3)

"A storage area for wheelchairs, etc. should be built at the Camp Kailua area with a few parking spaces for handicapped and individuals with special needs, as well as for park personnel."

"Your plan has the "surf chairs" at the new pavillion, but the parking for the handicapped is at the middle parking area across from Buzz's."

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9/22/95

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"Two new structures will be constructed in the park: the open pavillon...." (Pg. 4)

"You are spending money to build the open pavillon, but you have said it would cost too much to repair or rebuild a pavillon at the Camp Kailua area.

OTHER CONCERNS:

"You don't mention the existing outdoor showers located in the park area across from Buzz's. For years there has been a serious water drainage problem. It floods the walkways and surrounding grassy areas with yucky, soapy water, and settles around the roots of the banyan tree. This issue needs to be addressed and appropriate drainage provided.

"...camping is incompatible with the recreational uses of Kailua Beach Park..." I disagree with this determination. Kailua Beach Park is a perfect place for family or small group camping with permits and appropriate rules. What better use than to enjoy the beach in the evening in a controlled and safe environment. The experiences over the last few years show that camping at Camp Kailua created NO problems whatsoever!

Please keep me informed of the progress of this project.

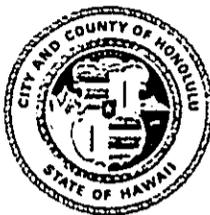
Aloha,

Rep. Eve Anderson

Representative Eve Anderson

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

The Honorable Eve G. Anderson
State Representative
State Capitol
Honolulu, Hawaii 96813

Dear Representative Anderson:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 22, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

PAVILION

The open pavilion will be centrally located with respect to improvements proposed on the Lanikai end of the park.

"The interior floor space"

A storage facility for wheelchair equipment on the Lanikai side of the park may be considered later as a future project.

Parking for the disabled is and will continue to be provided near the existing pavilion on the Kailua side of the park.

OTHER CONCERNS:

Drainage improvements for the outdoor showers are not part of the proposed project but may be considered later as a future improvement project.

The Honorable Eve G. Anderson
Page 2
January 10, 1996

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
FT. SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF

August 22, 1995

RECEIVED
1995 AUG 24 P 1:21
DEPT. OF PARKS
& RECREATION
PLANNING DIVISION

Planning Division

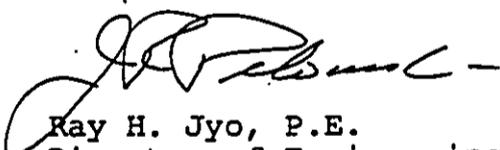
Ms. Dona L. Hanaïke, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Hanaïke:

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Kailua Beach Park Revised Master Plan, Kailua, Oahu (TMKS 4-3-9: 1, 2; 4-3-10: 83, 84, 88, 92-95, 101, 102; and, 4-3-11: 59, 74-76). The following comments are provided pursuant to Corps of Engineers authorities to disseminate flood hazard information under the Flood Control Act of 1960 and to issue Department of the Army (DA) permits under the Clean Water Act; the Rivers and Harbors Act of 1899; and the Marine Protection, Research and Sanctuaries Act.

- a. Based on the information provided, a DA permit will not be required for the project.
- b. The flood hazard information presented on page 7 of the environmental assessment is correct.

Sincerely,


Ray H. Jyo, P.E.
Director of Engineering

952407
8/24/95

8/25
2/75

5
8/22

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Tom Ushijima, P.E.
Director of Engineering
U.S. Army Engineer District, Honolulu
Department of the Army
Ft. Shafter, Hawaii 96858-5440

Dear Mr. Ushijima:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your August 22, 1995 letter concerning the Draft Environmental Assessment prepared for the subject project. The Department of Parks and Recreation will use the permit and flood hazard information in our planning for Kailua Beach Park.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

A handwritten signature in cursive script, reading "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei

United States
Department of
Agriculture

Natural
Resources
Conservation
Service

3049 Ualena Street
Suite 801
Honolulu, HI
96819-1950

September 7, 1995

Ms. Dona L. Hanaïke, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

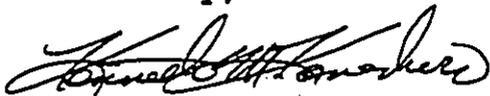
Dear Ms. Hanaïke:

Subject: Draft Environmental Assessment for the Kailua Beach
Park

We have reviewed the Draft Environmental Assessment for the
Kailua Beach Park master plan and have no comments to make at
this time.

Thank you for the opportunity to review the DEA for the Kailua
Beach Park.

Sincerely,



Kenneth Kaneshiro
State Conservationist

cc: Mike Bajinting

RECEIVED
1995 SEP 18 A 8:12
DEPT. OF PARKS
& RECREATION
HONOLULU, HI

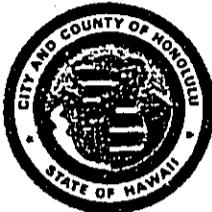
95-2855
9/18/95

#114
9/20

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Kenneth Kaneshiro
State Conservationist
Natural Resources Conservation Service
United States Department of Agriculture
3049 Ualena Street, Suite 801
Honolulu, Hawaii 96819-1950

Dear Mr. Kaneshiro:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We will keep your department apprised of improvements that may affect resources under your jurisdiction.

If you have any questions, please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,

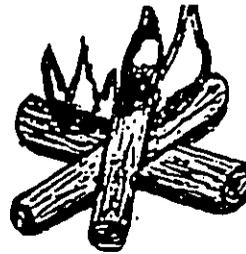
A handwritten signature in cursive script, appearing to read "Dona L. Hanaike".

DONA L. HANAIKE
Director

DLH:ei

CITIZEL FOR CAMP KAILUA

150 Hamakua Drive, Suite 793
Kailua, HI 96734



RECEIVED

September 20, 1995

'95 SEP 22 P4:00

CITY AND COUNTY OF HONOLULU
DEPARTMENT OF PARKS AND RECREATION
650 So. King Street
Honolulu, HI 96813

Subject:

**Response to Kailua Beach Park Revised Master Plan
Draft Environmental Assessment**

Thank you for providing us with a copy of the Draft Environmental Assessment for the Revised Master Plan for Kailua Beach Park. In view of the SMA permit issued by the City Council on May 26, 1993 (Resolution 93-134 CD-1) mandating the retention and renovation of the buildings at Camp Kailua, and City Council Ordinance 92-35 relating to ocean-side and inland cabin camping, we find your proposal for a revised Master Plan for Kailua Beach Park a troublesome and astonishing turn of events.

We have carefully read the Draft Environmental Assessment sent to us and find it very deficient and incomplete. The first matter that needs to be pointed out is that this revised Master Plan requires a full Environmental Impact Statement before it can proceed anywhere.

We shall focus our comments mainly on the disposition of the Camp Kailua parcel. However, before we do so we would like to briefly address some of the other items.

Pavilion Access Road

The Revised Master Plan for Kailua Beach Park's main map, or conceptual drawing, shows the present pavilion access road as being eliminated and access to the pavilion parking lot provided by a park road along Makalii Road. There is no mention of this plan in the text nor of the ways in which it would impact upon the present park activities in that area, including the commercial use by windsurfing companies and the parking. Figure 2 Site Map shows no change in the pavilion access road from the previous plan. Which one of the two documents is the correct one?

The re-routing of the road would bring us back to a plan that the community rejected four years ago. One reason for the community's objection was the detrimental effects on residents along Makalii Road. Another was the impact on

29
9/22

the use of the park. The present pavilion access road divides the open space in that area of the park into two distinct activity areas. As shown in photographs on the use of the various Kailua Beach Park areas which we took daily for seven consecutive days in May and again during seven consecutive days in August, one area is used mainly for picnicking and ball playing, the other more for the assembling of windsurfing equipment and for sunbathing. The 15 parking stalls in this area and the parking along the pavilion access road from Kailua Road to the pavilion are the most heavily used of any of the parking areas at Kailua Beach Park. It is also where the windsurfing companies park their vans.

We continue to object to a change in the pavilion access road as it does not represent the best use of this park area.

Canoe Halau

The location for the canoe halau has been penciled in on the plan without consultation with and input by the users of the facility who in the past have voiced preference for the Camp Kailua location, specifically for the Lanikai side of the former office building close to the parking lot and boat ramp, a location which we continue to support. No details are provided regarding the size of the halau, how canoe trailers will maneuver in that area, how much parking will be lost, how many trees will have to be removed, how views will be affected, how easy it will be to carry the canoes to the ocean when the canal is closed (which is most of the time) and the canoes have to be carried through the parking lot, up the hill and then down the steep embankment. Also, what exactly is meant by "canoe halau with access for disability?" What do the disabled do in the canoe storage area, carry canoes in and out?

New Handicap Parking Stalls and Beach Wheelchair Equipment

The main map, or conceptual drawing, shows "accessible parking" in the pavilion parking lot. Figure 2 Site Map does not show this. Does the "accessible parking" refer to the two present handicap parking stalls?

Storage for beach wheelchair equipment is provided in the existing pavilion area, yet the new handicap parking stalls are provided for at the end of the Kawailoa parking lot.

After they park, are the disabled who need a beach wheelchair expected to make their way across the bridge to get their chair? Having taken extensive photographs of the area, we ask how, once they get them, do the handicapped, or their attendees, get the beach wheelchairs up the embankment and down the steep slope into the

water? Will they have to completely exhaust themselves, or get injured or killed in the process before gaining access to the beach and water? That, according to lifeguards, is a good possibility if proposed plans should be enacted. Or do the handicapped wheel back over the bridge all the way down Kawailoa Road to the Camp Kailua area to gain easier access to the water?

Maybe by penciling in these provisions for the handicapped in the plan, the City thought to, at long last, having satisfied the requirements for beach access for the handicapped under ADA law. No thought seems to have been given to the appropriateness of the designated areas and logistics of actually providing negotiable access to the beach and water. The document shows an appalling ignorance of the needs of the handicapped and the obstacles they must deal with. The proposed provisions do no enhance the opportunities for persons with disabilities to use the ocean and ocean related recreational facilities in a satisfactory manner.

Realignment of the Bikeway

Together with the Kailua Neighborhood Board and other members of the community, we actively participated in the planning of the present alignment of the bikeway. The bikeway received community input through the public hearing process, and an SMA for its construction was issued by the City Council last December. Funding was appropriated and the project is out for bid.

The main map, or conceptual drawing, is very poor and the only reference to the bikeway appears at the very far end of the park near Alala Road. The bikeway seems to go directly along Makalii Road. Is it within the park boundary or is it going directly along Makalii road? There is no discussion of the impacts of the realignment of the bikeway, or of the implications for the community of having to go through yet another SMA process, the possible lapsing of appropriated funds, and further delays in the completion of the long-awaited bikeway.

The only reference to the bikeway is that it is being realigned because of safety concerns. This is surprising since safety concerns were specifically addressed during the SMA permit process for the present alignment. We made a photographic inventory of the width of all bikeways in Kailua. Except for a short stretch between the boat ramp area and Alala Point, we found no 10-foot wide bikeways anywhere. In a number of areas the bikeways are 4 feet wide, at some points even less, and the City does not seem to be particularly concerned about the safety in those areas. Why this sudden safety concern about a ten-foot wide bikeway along a straight stretch of road? The area between the fence of Camp Kailua and the shoulder of the road measures between 13'6" and 15', with an over-all average of 14', which can accommodate a ten-foot super highway bikeway without jeopardizing safety. Note that under the present alignment, the bikeway enters Camp Kailua shortly after the

perpendicular row of trees past the main dormitory. It is safely within the park boundaries well before it comes to Alala road and remains within the boundaries of the Beach Park until it meets the Lanikai bikeway near the Alala parking lot.

The reason stated for changing the bike alignment begs questions and does not justify further expenditures of taxpayers' money, nor the jeopardizing of the funding of the present alignment, and further delays in providing the community with the long-awaited bikeway.

Ocean Views

The contention that the proposed removal of structures at Camp Kailua will afford new coastal views from Kawailoa road is incorrect. Mention is made of the obstruction of ocean views not only by buildings but also by shrubs and some ironwood trees. The discussion is, however, only about removing the camp's buildings. No mention is made about the removal of shrubs and trees to obtain the new ocean views that the assessment talks about. The large sand dune, the Samoan Fale, the beach comfort station, the shrubs (unless they are removed and the sand allowed to blow across the camp area), the ironwood trees, and the roof of the proposed new pavilion would continue to obliterate any significant ocean views even if the present Camp Kailua buildings were removed. Hence, no significant ocean views will be gained by the demolition of Camp Kailua.

While there seems to be concern about the alleged obliteration of ocean views by the present buildings of Camp Kailua, no similar concern is expressed about the impact on ocean views and visual impact on the landscape by the proposed canoe halau.

Access to Site

Primary access to the new pavilion and new picnic area in the present Camp Kailua area is to be directly through the existing Kawailoa Road parking lot. The map shows a road through the newly grassed-over park area. There is no discussion of the costs to taxpayers of building a road right through the recently completed area of the park for which we paid \$300,000 to plant grass, to landscape and to install a sprinkler system. No mention is made of how this decimation of the new area affects its use.

Water Quality

There is no discussion of the impact on the shoreline environment and water quality by the expanded use of Kailua Beach Park that the assessment talks about. The issues of increased use, concomitant degradation of the environment and carrying

capacity of the affected shoreline, water and marine life were not addressed. Are we to repeat the mistakes of Hanauma Bay?

Parking

The statement is made that Kailua Beach Park has enough internal parking to accommodate users on weekdays but that parking is overflowing the beach park on weekends and holidays, causing unauthorized parking on grassy areas of the park. Although the problem is acknowledged, no remedies are proposed. There is talk about an expanded use of Kailua Beach Park, but nowhere is a discussion of any mitigating measures to the weekend parking problem found. Rather than seeking solutions to the weekend parking problem, the revised plan proposes to aggravate the situation by removing the 40+ parking stalls that exist for the general public using Camp Kailua. In effect, the parking inventory at Kailua Beach Park would be reduced by at least this number of stalls.

Mention is made of the addition of 8 new parking stalls for the handicapped at the Lanikai end of the Kawailoa parking lot. On the other hand, no mention is made of the inevitable loss of parking stalls at the other end of the parking lot where the canoe halau is planned, a loss that will probably more than off-set the gain of the 8 parking stalls at the Lanikai end of the parking lot. The net effect is a loss of badly needed parking space for the present use, not to mention a much aggravated situation in the future when more people are expected to use the park. Where will they park?

Costs of Improvements

If the costs of the proposed improvements are only \$700,000, then were taxpayers' monies inappropriately used or irresponsibly squandered on the improvements so far completed under the present Master Plan for Kailua Beach Park? If this is not the case, then your estimate for the items under the revised plan appears to be too low. No details of the costs are given. Without a breakdown of costs, it is not possible to properly evaluate the cost estimate.

A cost comparison for planning and building a new cabin camping facility at another ocean-side location versus renovating the existing buildings at Camp Kailua was also not provided.

DEMOLITION OF CAMP KAILUA FACILITIES

a. Park Expansion/Open Space Argument

Since the three-acre parcel of Camp Kailua has been part of Kailua Beach Park since it was purchased, we fail to understand the reference to "an expansion" of the Beach Park under the new revised Master Plan. The parcel has provided needed and beneficial recreational services within the confines of Kailua Beach Park ever since it was purchased. Note that nowhere in any plans nor acquisition documents for Kailua Beach park lands does it state that any portion of Kailua Beach park was ever purchased to provide more open space. The expressed intent for the expansion of Kailua Beach Park from the very beginning was not "open space", but as clearly stated by Mayor Jeremy Harris, "the expressed intent was to create an island-wide resource for the future needs of island residents." Therefore, the use of Camp Kailua as a cabin camping facility and for related recreational services does not contradict the plans for Kailua Beach park, unless it can be demonstrated beyond doubt that the proposed alternate use of the three-acre parcel would serve the present and future needs of island residents better than would Camp Kailua. This the draft assessment fails to do.

a. Alternate Use

The results of our surveys on the uses of the various areas of Kailua Beach Park, and interviews with social service agencies, handicapped and community groups show that the needs of our island residents are far better served by the recreational and social services provided by Camp Kailua than they would be by additional picnic tables and grassy areas. The occupancy of an average of only 17 percent of the existing picnic tables during the week of May 4-10, and an average of 48 percent for the week of August 7-13, does not indicate a need for additional picnic tables at the expense of the multitude of beneficial and needed services provided by Camp Kailua. Neither, as the survey shows, does the use of the present grassy areas and existing barbecue facilities justify doing away with Camp Kailua to provide additional grassy area and build more barbecue facilities.

"Accessible fitness equipment" is proposed without discussing what this equipment consists of, whom it is for, how much it costs, what the maintenance costs of fitness equipment exposed to a beach climate are, and how it is protected from vandalism in an open park. If the equipment is intended for the handicapped, is it not a bit far from the areas to which they have been relegated?

The "meandering" walkways have a curious pattern that does not seem to lead anywhere except in a circle.

b. No Action Argument

It is ironic that the deteriorated state of the camp's buildings, visual blight, and the

fact that the camp is unused should be cited as reasons to do away with the facility when the City Administration itself is responsible for the closure of the camp and its deteriorated condition.

The present situation is indeed unacceptable. The surrounding community has the right to expect that the area be cleaned up but it can be cleaned up by restoring the buildings and return them to the use by the general public, including the handicapped, as was the case before the camp was closed. The camp does not have to be torn down in order to clean of the mess that is of the City's own making.

The statement that restoration expenditures would be excessive is incorrect. We have consulted reputable licensed contractors who are willing to restore the facilities and bring them in compliance with ADA law requirements for under 1 million dollars. A good number of the community members and businesses have also offered to help with donations of labor or materials.

c. Incompatible Use of the Site for Cabin Camping

As mentioned under section a) above, the use of the site for cabin camping is not inconsistent with the planning documents pertaining to Kailua Beach Park nor is it in contradiction of the City's established policies. City Council Ordinance 92-35 of April 27, 1992, clearly mandates the maintenance and construction of more ocean-side and inland camping facilities. City Council Resolution 93-134 CD-1 clearly mandates the retention and renovation of cabin camping at the Camp Kailua site.

The argument that cabin camping at Camp Kailua is an incompatible use of this urban beach area and that rural sites are better suited represents an archaic way of thinking that ignores modern trends and progressive ways of dealing with present and future demographics and recreational needs. It shows a lack of understanding of the recreational needs of a large portion of our population and of the logistics of providing for these needs.

It is precisely the semi-urban location of Camp Kailua that has made it so desirable in the past and has made it an undeniable success. The protective nature of the camp and the proximity to the population center, medical facilities, nursing homes, churches, schools, and social service agencies serving the aged, the infirm and the disadvantaged groups, have allowed many people to have an ocean-side camping experience that many would never have been able to enjoy had the camp been located farther away from the urban center. The best place to locate a camp is where it serves the needs best. And by that criteria there is no more ideal location on this island than the present site of Camp Kailua. What is the ultimate goal of our recreational programs if not to present the services where the island residents can best avail themselves of them?

d. Alternate Ocean-Side Cabin Camping Site

The assessment states that there is general agreement that cabin camping is a desirable social and recreational activity, and that it should be provided where suitable and feasible. It is both suitable and feasible at Camp Kailua. The City's committee whose objective, as stated in the assessment, is to locate and recommend other sites has so far failed to come up with an alternate site that matches the advantages of the Camp Kailua site. All sites mentioned so far are neither suitable nor feasible. They all have drawbacks and obstacles that will make the building of a new ocean-side cabin camping facility unlikely in any foreseeable future. Where does that leave the equal recreational rights to an ocean-side camping experience of those who are physically or mentally unable to pitch and camp in a tent? The City is exposing itself to a lawsuit.

The City's own camping experts agree that Camp Kailua is the best site. Given the demographics of our population and the existing needs, the City should pursue the search for other sites not as replacements of Camp Kailua but rather as supplements. Anything else is in violation of established City's policies as enacted by the City Council, the policy maker for the City and County of Honolulu.

e. Social and Recreational Characteristics

A number of arguments raised in Section 2.2 have already been addressed above.

Section 2.2 enumerates the wide variety of beach and ocean-related activities offered by Kailua Beach Park, which include outrigger canoeing, windsurfing, swimming, picnicking, bicycle riding, jogging and sunbathing, and how the proposed improvements will expand and enhance the recreational opportunities for all of the park users. Section 4.9 also describes how the use of the Beach Park is carved up to ensure the use and safety of a number of the above mentioned activities.

There is a failure, as we have partly mentioned under another heading above to similarly address the needs and safety of those not able to engage in many, if any, of the above enumerated activities. No consideration was given to the desire and right of elderly and handicapped persons to spend a night camping near the ocean away from the four walls that many are confined to the rest of the time. No serious thought was given to the comfort and safety of the handicapped when their proposed parking stalls and beach wheelchairs were placed far away from easy access to the beach and water. Tearing down Camp Kailua and its protective fence seriously impacts upon the recreational opportunities and safety of many handicapped individuals. The removal of the protective fence especially impacts upon the mentally retarded children and adults who tend to wander off. None of the impacts as they pertain to these citizens and park users are addressed.

The statement that "the absence or presence of any facility serving both disabled and non-disabled populations, affects both equally. Therefore, neither population is exclusively served nor penalized" is incorrect if not mind-boggling. Contrary to the statement, the two populations are not equally affected. The non-disabled still have options for ocean-side camping, such as tent camping. The handicapped who are unable to pitch a tent and camp near the ocean lose their option when the only ocean-side cabin facility is demolished.

e. Economic and Social Value

The economic value and social benefits emanating from the many preventive and rehabilitative programs carried out in the past by social service agencies, youth, church and community groups in the healing environment of Camp Kailua were not evaluated and compared with the social and economic value of picnic tables and grassy areas. The dollars saved down the line by greater work productivity, less incarceration, and greater contributions to society achieved by the preventive and rehabilitative programs carried out the various groups in the Camp Kailua setting, as well as the human dignity generated by these programs, are of inestimable social and economic value and should not be ignored when considering the value of alternate uses for the site.

Camp Kailua in the past was more than a cabin camping facility, it was an important social and recreational resource which contributed to the health and welfare of our island population in a way that the proposed alternate use would never be able to.

f. Loss of Cultural Values

The demolition of Camp Kailua involves the irrevocable loss of a significant cultural resource. Camp Kailua represents a vestige of old Hawaii, a natural gathering place conducive to ohana and good feeling, a feeling that cannot be easily re-created elsewhere. It is a feeling that the City often professes that we must maintain, for tourism if for nothing else, but that it is willing to destroy at Camp Kailua. 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 some day. None of this was addressed in the assessment.

PROPOSED DETERMINATION

We disagree with most of the assessment's proposed determinations.

As shown above:

- 1) The proposed project does involve the irrevocable loss of a cultural resource.

- 2) The restoration of Camp Kailua with all its related services represents by far the best use of this three-acre parcel and is environmentally the least damaging. The proposed project does curtail the beneficial uses of the environment.
- 3) The project does conflict with guidelines expressed in Chapter 344 of the State Environmental Policy statement and with court decisions.
- 4) The project will have adverse affects on the economic and social welfare of the community.
- 5) The difficult obstacles to beach access for the handicapped and denial of cabin camping opportunities do not enhance public health as stated. Public health as affected by possible water degradation due to increased use of Kailua Beach Park was not addressed in the assessment.
- 6) The project is likely to have substantial secondary impacts on public facilities. The expanded use of Kailua Beach Park that the assessment talks about entails greater use and greater pressure on public facilities.
- 7) The increased use of a fragile coastal environment does carry the potential for degradation of environmental quality. This potential was not addressed. Therefore, how can the assessment state an absence of substantial environmental degradation?
- 8) The project does make a commitment to larger actions in the sense that it promotes greater and greater use of the coastal environment which will result in cumulative affects on that environment.
- 9) No comment
- 10) It anticipated increased use of the coastal environment and waters will result in a deterioration of water quality and increase the ambient noise levels. The assessment fails to adequately address the question beyond the construction face.
- 11) The coastal waters are an environmentally sensitive area and greater use will eventually adversely affected that environment. The effects of the increased use and the carrying capacity of the coastal environment at Kailua Beach Park were not addressed.

SUMMARY

The Draft Environmental Assessment for the revised Master Plan for Kailua Beach Park as submitted to us for comment is severely deficient, and in many respects sloppy. It fails to adequately address important environmental, social, and cultural impacts, as well

as the equal access rights and needs of our disabled and elderly population.

We do not concur with the proposed determination that the revised Master Plan for Kailua Beach Park will not result in significant environmental impacts. We look forward to the opportunity to comment on a hopefully more thorough full Environmental Impact Statement which is required by this project.

Sincerely yours,

Ursula Retherford
CITIZENS FOR CAMP KAILUA
Ursula Retherford

cc: Gary Gill, Director
Office of Environmental Quality Control
220 S. King Street, Suite 400
Honolulu, HI 96768

John Henry Felix, Chair
Committee on Parks Health and Safety
City Council
Honolulu, HI 96813

Steve Holmes, Councilmember
City County
Honolulu Hale
Honolulu, HI 96813

Eve Anderson, State Representative
41-505 Kalaniana'ole Hwy
Waimanalo, HI 96795

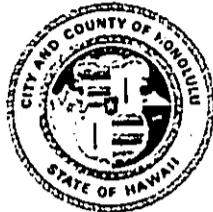
Whitney Anderson, State Senator
423 Aulima Loop
Kailua, HI 96734

Cynthia Thielen, State Representative

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Ms. Ursula Retherford
Citizens for Camp Kailua
150 Hamakua Drive, Suite 793
Kailua, Hawaii 96734

Dear Ms. Retherford:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 20, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

Pavilion Access Road

The Environmental Assessment was prepared to evaluate environmental impacts resulting from modifications to existing facilities and areas and construction of needed new facilities. The Master Plan for Kailua Beach Park was not the subject of the Draft Environmental Assessment (DEA) but the Master Plan (exhibit) was included in the DEA to show the general location of the proposed improvements.

An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

Canoe Halau

Canoe groups that presently use the stream have been requesting a canoe halau at this site for many years. The halau will be designed as an unenclosed, free standing structure of approximately 3,375 square feet (45' X 75'). The structure is about 15 feet in height and topped with a modified hip roof. The number of canoes to be stored at the halau will be determined by the Department of Parks and

Ms. Ursula Retherford
Page 2
January 10, 1996

recreation. Use regulations will be promulgated at a later time.

Construction of the canoe halau is not anticipated to significantly affect coastal views. The structure will be placed in a clearing amidst a grove of trees and will be open on all sides. Views from mauka areas in the direction of the beach will be through rather than obstructed by the halau. Views "through" the halau may occasionally be obstructed by canoes stacked inside the halau. The height of the halau is within the height limit for the preservation zoning district.

New Handicap Parking Stalls and Beach Wheelchair Equipment

Parking for the disabled is and will continue to be provided near the existing pavilion on the Kailua side of the park. Eight additional parking stalls for the disabled will be provided in the Kawaihoa Road parking lot. One of the goals of the proposed project is to increase accessibility to the beach and the entire park for the disabled.

A storage facility for wheelchair equipment on the Lanikai side of the park may be considered later as a future project.

Realignment of the Bikeway

The Master Plan shows a segment of the bikeway (approximately 200 lf) passing through the grounds of the former Camp Kailua site about 20 feet outside the right-of-way of Kawaihoa Road. The approved Special Management Permit for the bikeway placed this section along the edge of Kawaihoa Road. Placing this section of the alignment inside the park grounds is proposed for safe cycling purposes.

The Department of Parks and Recreation will consult with the Department of Transportation Services (DTS) about the change in alignment. If the conceptual realignment is approved by the City Council, the DTS will submit a "request for minor modification" to the approved Special Management Area permit for the bikeway.

The bikeway drawn on the Master Plan is a depiction of the general alignment and not intended to be a precise layout.

Ocean Views

The EA acknowledges that "ocean views from Kawaihoa Road across the old camp area are completely obstructed by buildings, shrubs and some ironwood trees" (Section 4.8

Ms. Ursula Retherford
Page 3
January 10, 1996

Coastal Views, pps. 10-11). The aesthetic impact of the project was described as "the removal of the deteriorated buildings in the former camp area and the creation of new landscaping and recreational facilities in the park should improve the aesthetic appearance and security of the park by providing more open views."

The EA also acknowledged that existing views toward the ocean are obstructed by both man-made structures and naturally occurring sand dunes along the shoreline.

Access to Site

No road through newly grassed open space (on the Lanikai side of the park) is proposed or depicted.

Water Quality

Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities. Debris from the park blown into the stream is collected and removed by parks maintenance personnel.

The proposed improvements will have no adverse impacts on ocean waters. No work within the shoreline or shoreline setback area is proposed as part of this project.

Parking

Future users will have to find parking within parking lots inside the park or park outside the park. There are a sufficient number of parking stalls within the park to serve users on weekdays. However, weekend parking demand exceeds the available parking spaces within the park. Illegal parking is common on weekends within the makai portion of the park and abutting streets and many choose to park on the grassy shoulder of Kawaihoa Road.

Costs of Improvements

Construction monies have not yet been appropriated. The \$700,000 is a preliminary estimate for the proposed improvements. Actual costs estimates will be refined to a line item level of detail during the design and engineering of the project. If additional funds are required, the Department

Ms. Ursula Retherford
Page 4
January 10, 1996

will request funds through the City's CIP process. The cost for planning and engineering is estimated at \$100,000.00 and is in addition to the estimated construction cost.

DEMOLITION OF CAMP KAILUA FACILITIES

a. Park Expansion/Open Space Argument

Please refer to No Action discussion below.

The Environmental Assessment is a disclosure document and not the appropriate document to "demonstrate[d] beyond doubt that the proposed alternate use of the three-acre parcel would serve the present and future needs of island residents better than would Camp Kailua".

a. Alternate Use

The fitness equipment is a series of exercise events for exercising and stretching different body parts. The non-movable, fixed in place equipments will be installed within a 2,000 square foot area (estimated at 40' X 50'). The fitness equipment consists in part of boards, benches, horizontal bars, and poles designed for events such as sit-ups, trunk stretch, and bench curls. Exercise events and equipment can be used by the general public including the disabled.

Walkways will provide ADA access from the parking lot to various areas of the park and facilities as well as provide for passive strolling.

b. No Action Argument

The proposed improvements will add accessible features to the park. Since 1982, when the city first purchased the Camp Kailua land, the stated purpose for its acquisition was for more open park space for use by the general public. It was on that basis that money was appropriated and spent to acquire the land. The poor condition of the buildings are due to their age not any neglect by the city. The buildings were in poor condition when the city purchased the land. In fact, the stated reason by the Methodist Church for selling the property was the dilapidated condition of the camp and the expense to maintain and upkeep the facility.

c. Incompatible Use of the Site for Cabin Camping

Please refer to discussions on No Action and Alternate Ocean-side Camping.

Ms. Ursula Retherford
Page 5
January 10, 1996

d. Alternate Ocean-Side Camping Site

The Department of Parks and Recreation has been charged with establishing beach and inland camping facilities on the island of Oahu. Towards this end, the Department has organized a task force to search for suitable sites for cabin camping facilities.

Waimanalo Bay Beach Park has been suggested as one site for Windward Oahu and the Department is examining another site on the North Shore. The site selection process does not include design work and cost estimates for building a facility. The DPR has been working with the School of Architecture at the University of Hawaii to design a cabin camping complex on about 20 acres of land in Waimanalo Bay Beach Park.

e. Social and Recreational Characteristics

Camp Kailua was never designed nor built to standards for accommodating the specialized needs of the disabled; nor was it ever intended to be exclusively for use by the disabled. It is important to also realize that Camp Kailua has been closed to the public since 1991 and it is impossible to meaningfully assess impacts on various groups who have not been able to use the facility since that time.

The purpose of the Environmental Assessment is to evaluate impacts resulting from improvements to Kailua Beach Park. It is beyond the scope and intent of the Assessment to assess all social and recreational impacts on all groups when Camp Kailua is demolished.

f. Economic and Social Value

Data is not available to compare the economic value and social benefits of preventative and rehabilitative programs conducted previously at Camp Kailua and the future economic value and social benefits of recreation improvements.

The Department of Parks and Recreation has not ignored the needs of those people who used to use Camp Kailua. The Department has built new meeting facilities for groups that used to congregate at Camp Kailua in Kailua District Park and at Kalama Beach Park and is searching for new sites for cabin camping.

Ms. Ursula Retherford
Page 6
January 10, 1996

f. Loss of Cultural Values

Kailua Beach Park is a recreational resource not a cultural resource.

PROPOSED DETERMINATION AND SUMMARY

After carefully reviewing all comments received during the environmental assessment process pertaining to the proposed improvements, the Department of Parks and Recreation finds that the Proposed Determination in the Draft Environmental Assessment and determination of no significant environmental impact is still valid.

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp

363 Lapa Place
Kailua, Hawaii 96734
September 19, 1995

Mayor Jeremy Harris
City and County of Honolulu
City Hall
Honolulu, Hawaii 96813

RE: Revised Master Plan for
Kailua Beach Park

RECREATION
&
C & C OF HONOLULU

1995 SEP 26 P 2:38

RECEIVED

Dear Mayor Harris:

Thank you for sending me a copy of the Draft Environmental Assessment of the Revised Master Plan for Kailua Beach Park. I am very pleased with the overall concept as depicted by the attached map. It shows that an attempt has been made to incorporate all the diverse positions of Kailua residents (and others), as well as provide some innovative ideas that should solve some maintenance problems.

My comments will identify the Section and subsection.

SECTION 2 GENERAL DESCRIPTION OF PROJECT

Subsection 2.1.2

OPEN AIR PAVILION - This is a great plus for all groups, like AA, Tai Chi, etc., now meeting in the open grassy areas of the park. It would also provide senior Citizens groups, currently meeting at Kailua Recreation, an alternative meeting area for special events. SUGGESTION: If, or when, finances are available roll up/down screens should be considered. These could diminish the effects of high winds and rain.

CANOE HALAU - This is long overdue. I first met with City officials and representatives of various canoe clubs in the early 80's, before, but while negotiations were in progress, for Camp Kailani and the additional house all intended for beach park expansion. In the intervening years, several plans and locations were discussed.

QUESTIONS - Is the proposed halau just for canoe storage during BOTH the off season (mid October to March) and the canoe racing season (March thru mid October)? And is the site of the proposed halau also the main (only) practice site for the canoe clubs at Kailua Beach Park?

Currently six canoe clubs practice at Kailua Beach Park. Kailua, Kai Oni, Ko'olau and Waimanalo use the area where the proposed halau is sited. Windward Kai and Hawaiian Outrigger use the area along Lihikai Road next to Kaelepu stream. Lanikai has used this same area in the past, but currently practices elsewhere. Each club has a minimum of 3 fiberglass canoes and a maximum of 10 to 12. Some clubs also have koa canoes. Membership runs from under 50 for the smaller clubs to 250 plus for the larger clubs.

95-2988
9/26/95 AH

SECTION 4 AFFECTED ENVIRONMENT

Subsection 4.8 -

COASTAL VIEWS. Where possible it would be nice to have more open views across the park to the ocean. During the 34 years I have lived in Kailua a good portion of the views across the park have been blocked out by growth of existing vegetation. While I do not advocate eliminating mature vegetation, which helps hold the soil and prevent erosion, judicious pruning and proper selection of new plants could help enhance what views could be achieved. The newly opened area is a delight to look across.

Subsection 4.11 -

PARKING AND TRAFFIC. Weekend traffic and parking problems could be eased:

1. If the City and County and the State of Hawaii reached an agreement to provide alternative parking at Lanikai Elementary and Kailua Intermediate.
2. operated a small shuttle beach bus between them to the beach park.
3. operated a beach bus throughout Kailua, that would allow Kailua's residents to take beach chairs, small coolers, boogie boards, etc. on board or in special attachments to the exterior of the bus.

SECTION 6 ALTERNATIVES CONSIDERED

Subsection 6.2 CABIN CAMPING AT CAMP KAILUA

I do not feel that Kailua Beach Park is an appropriate area for cabin camping.

I originally felt that some buildings in the Camp Kailua area should be saved and repaired for a canoe halau, an ocean safety building, and a small open air meeting area. The proposed new pavilion provides an open air meeting area. The proposed canoe halau provides canoe storage. But no where in the proposed beach park plan do I see any area set aside for ocean safety instruction.

With swimming, canoeing, windsailing, boogie boarding, surfing, boating all occurring in the ocean area off Kailua Beach Park, an ocean safety headquarters makes sense. I am appalled that because our City Council seems only focused on saving Camp Kailua they can not see the wisdom of having an ocean safety headquarters for water safety officers, their equipment and an ocean recreation safety program. It should have been incorporated in the current proposal. Our elected officials are optimizing the narrow thinking of the "savealls" and "nonos", who do not want anything but what they feel is best and are adverse to any compromise. I thought our elected councilmembers were more openminded.

THEREFORE, I feel it is very important for an ocean safety headquarters to be located at Kailua Beach Park. It would provide lifeguards with office space, storage for their equipment, and could be located close enough to the

new pavilion in order to provide ocean safety classes for our school children, and all other residents. The visual markers (the swimming bouys, the boat ramp, the mouth of Kaelepulu Stream, Popoia Island surf area, etc.) are already in place for such an undertaking. Needless to say any ocean safety program should be geared for all, including disabled persons.

In closing, I would like to compliment the City for the enhanced appearance of Kailua Beach Park in the area of the demolished houses and for working with the Lani-Kailua Outdoor Circle to beautify the area on Aala Point. Both areas are now being enjoyed by all. The project at Aala Point shows that the City and private groups and non-profit organizations can work together to achieve a mutually beneficial goal. Lets use foresight and incorporate this same principle into completing the expansion and refurbishment of Kailua Beach Park. Forget about anymore studies or polls or whathave you, get on with the improvements. They are long overdue.

Mahalo for asking for any input I might have on the proposal for Kailua Beach Park.

Sincerely,



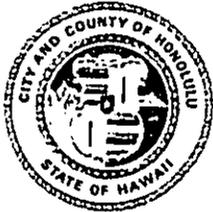
Barbara J. (Hoppy) Smith

CC: Dona Hanaike, Director, Department of Parks and Recreation
John Henry Felix, City Councilmember representing the Kailua area

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Ms. Barbara J. Smith
363 Lapa Place
Kailua, Hawaii 96734

Dear Ms. Smith:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

OPEN AIR PAVILION

Your suggestion of using roll up/down screens will be considered during the design of the pavilion.

CANOE HALAU

The number of canoes to be stored at the halau will be determined by the Department of Parks and Recreation. Use regulations will be promulgated at a later time.

Canoe groups that presently use the stream have been requesting a canoe halau at this site for many years. It is anticipated that the canoe clubs that practice at Kailua Beach Park will continue to do so.

COASTAL VIEWS

Your suggestions for pruning vegetation will be passed on to our maintenance personnel.

PARKING AND TRAFFIC

Your suggestions for alleviating weekend parking overload will be examined by the Departments of Parks and Recreation and Transportation Services.



Kailua Canoe Club, Inc.

P.O. Box 177 — Kailua, Hawaii 96734

Sep. 15, 1995

TO: Department of Parks & Recreation
City and County of Honolulu

SUBJECT: Kailua Beach Park Plan

RECEIVED
1995 SEP 18 A 8:12
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

This letter is a follow-up to the questions I asked at the presentation at the Kailua Neighborhood Board meeting Sep. 7, 1995.

1. Parking is scarce on weekends now, what is being done to provide for the additional park users expected in the new open areas? We have 250 members in Kailua Canoe Club alone. Luckily we don't all practice at the same time, but we do have nine canoes times six crew plus coaches and extras. So parking is also crowded late afternoons during regatta season, April to August. One suggestion would be to amend park rules to allow parking on the grass between the lot and the street on weekends only.

2. Is something being planned for pedestrians? Paddlers need to cross the street from the parking lot/canoe site to the side of the canal near Buz's Steakhouse. The speed limit is 15mph, but because of other congestion drivers are not always alert to pedestrians. We need at least a crosswalk or a pedestrian underpass along the water.

We are excited about the re-inclusion of a canoe halau and look forward to your meeting with Windward canoe clubs as promised by Paula Loomis.

Sincerely,

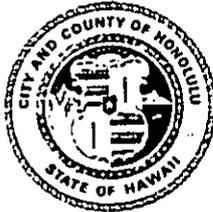
Mary Moore
Treasurer, Kailua Canoe Club
ph. 262-8512

-- 95-2856
9/18/95 JAD

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Ms. Mary Moore
Treasurer, Kailua Canoe Club, Inc.
P.O. Box 177
Kailua, Hawaii 96734

Dear Ms. Moore:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 15, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

1. Parking

Future users will have to find parking within parking lots inside the park or park outside the park. There are a sufficient number of parking stalls within the park to serve users on weekdays. However, weekend parking demand exceeds the available parking spaces within the park. Illegal parking is common on weekends within the makai portion of the park and abutting streets and many choose to park on the grassy shoulder of Kawaihoa Road.

Your suggestion for amending park rules to allow parking on the grass will be examined by the Departments of Parks and Recreation and Transportation Services.

2. Pedestrians

There are no plans to establish a crosswalk in the vicinity of Buzz's Steakhouse nor to construct a pedestrian underpass along the water (presumably Kaelepulu Stream) at this time. The question of striping a crosswalk will be raised with the Department of Transportation Services.

Ms. Mary Moore
Page 2
January 10, 1996

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp

September 15, 1995

Department of Parks and Recreation
650 South King Street
Honolulu, Hawaii 96813

RECEIVED
1995 SEP 22 P 3:14
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

DRAFT ENVIRONMENTAL ASSESSMENT
REVISED MASTER PLAN FOR KAILUA BEACH PARK

After reviewing the above document I have the following comments and concerns:

1. The map does not match the report. There are items shown on the map that are not discussed in the text. How can we respond to these items when there is ^{no} explanation of what is proposed?

2. The map shows that there will be quite a bit of grading yet there isn't much discussion on impacts to the ocean, Kaelepulu Stream or the park environment.

3. The estimated cost of \$700,000 for all the proposed changes doesn't seem adequate. Should the cost exceed the allotted amount what arrangements are there to get the extra money needed to finish the project? I would hate to see our lovely park torn apart and projects left incomplete due to lack of money.

4. The opening of more park space means more cars and people yet there is very little dialogue on the impacts from additional traffic and more beach and park use and congestion. Ocean quality will be impacted from an increased numbers of users but the impacts are not discussed.

5. The demolition of Camp Kailua is unacceptable. Until 1991 that facility served over 20,000 people a year. Not only did it provide safe beach use and cabin camping for disabled, social service and mental health groups, education and youth groups but the meeting rooms and kitchen were used by community organizations. Camp Kailua is a valuable facility but the only discussion is of the deteriorated condition and that it is too expensive to restore. A cost estimate for repair needs to be included and a cost analysis between repair and replacement at another location needs to be done.

Mahalo,

Rose Miltier

Rose Miltier

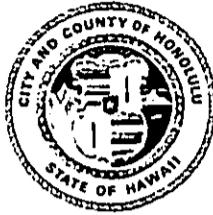
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05-2938
9/22/95

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K. C. AU
DEPUTY DIRECTOR

January 10, 1996

Ms. Rose Miltier
60 N. Kainalu Drive
Kailua, Hawaii 96734

Dear Ms. Miltier:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 15, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

1. The Environmental Assessment was prepared to evaluate environmental impacts resulting from modifications to existing facilities and areas and construction of needed new facilities. The Master Plan for Kailua Beach Park was not the subject of the Draft Environmental Assessment (DEA) but the Master Plan (exhibit) was included in the DEA to show the general location of the proposed improvements.

An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

2. The proposed improvements will have no adverse impacts on ocean waters.

Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented during construction of the canoe halau:

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be

Ms. Rose Miltier
Page 2
January 10, 1996

lined with a geotextile filter fabric to retain sediment and debris.

- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

Between 3.6-4.0 acres will be cleared and graded. This estimate includes the former Camp Kailua area, building sites for the canoe halau and pavilion, walkways, and picnic sites. Excavation for irrigation pipe and electrical conduits is required. Utility trenches will be restored to pre-construction conditions and no grading is anticipated.

The amount of soil to be excavated is not expected to be significant. Excavated material will either be reused elsewhere in the beach park as part of other projects or removed from the site in accordance with regulations governing such action.

Construction debris will be hauled to Waimanalo Gulch for disposal and green waste to a private recycling facility at Barbers Point.

The types of erosion control measures to be implemented during construction depend in part on what is being built, its exact location, the amount of area to be exposed, duration of construction, and grubbing and grading requirements. Measures will be specified on construction plans and job specifications and executed according to Best Management Practices (BMPs).

3. Construction monies have not yet been appropriated. The \$700,000 is a preliminary estimate for the proposed improvements. Actual costs estimates will be refined to a line item level of detail during the design and engineering of the project. If additional funds are required, the Department will request funds through the City's CIP process. The cost for planning and engineering is estimated at \$100,000.00 and is in addition to the estimated construction cost.

4. Future users will have to find parking within parking lots inside the park or park outside the park. There are a sufficient number of parking stalls within the park to serve users on weekdays. However, weekend parking demand exceeds the available parking spaces within the park. Illegal parking is common on weekends within the makai portion of the park and abutting streets and many choose to park on the grassy shoulder of Kawaihoa Road.

Ms. Rose Miltier
Page 3
January 10, 1996

The need to provide additional parking should not result in reduced park space. The lack of parking itself is a limiting factor on the number of people who will use the park.

5. Monies have not yet been appropriated to acquire, plan, and build new camping facilities. The Department of Parks and Recreation is searching for alternative locations for inland and beach camping facilities. Because a site or sites have not yet been selected, cost estimates of providing alternative camping sites are not yet available.

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp

September 20, 1995

City and County of Honolulu
Department of Parks and Recreation
650 So. King Street
Honolulu, Hawaii 96813

RECEIVED
1995 SEP 25 A 7:22
DEPT. OF PARKS
& RECREATION
C & C OF HONOLULU

We have the following comments on the Draft Environmental Assessment/Revised Master Plan for Kailua Beach Park.

It was very hard to tell what was the master plan and what was the EA. Is the Master Plan the map or the Draft Environmental Assessment or both? We understood that an EA or EIS was suppose to respond to a plan or proposal not be part of it. Are we under the wrong impression?

The Revised Master Plan for Kailua Beach Park map shows things that are not in the EA/Revised Master Plan such as: new entrance to the park and new parking lot in front of the pavilion. Since there is no information on these items we are unable to comment on them.

The water quality at Kailua beach is very important yet very little attention was given to either impacts from implementing the plan or improving water quality. We were quite disturbed to read that Kaelepulu Stream doesn't meet State water quality standards. It would seem to us that improving water quality would be given priority over other park projects.

The area where Camp Kailua is shows a network of walkways, pavilion, fitness equipment and bermed picnic sites. It was our understanding from presentations given by the Department that this area was for open space. Open space to us means uncluttered areas available for volleyball, ball throwing, frisbee tossing etc. but as presented the area is so cut up that none of these activities could happen.

The Alternatives Considered section is incomplete because it only discusses retention (with no restoration) or demolition of Camp Kailua. We suggest the following alternatives: 1) first priority is improving the quality of Kaelepulu Stream, 2) restore and retain Camp

95-2947
9/25/95

Kailua as a beach side cabin camping safe for the mentally and physically disabled, youth groups, the elderly and the community, 3) if more picnic areas are needed (we are not sure they are) move them closer to the parking lots and 4) make the beach accesses closer to the handicapped parking stalls.

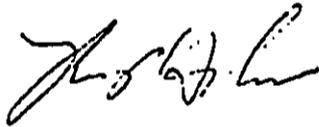
The Revised Master Plan for Kailua Beach Park presents a lot of new changes but impacts to the environment and water quality of the stream and ocean are not adequately dealt with. The Plan does not consider the cumulative impact from all the proposed changes.

The Master Plan is very superficial and since additional park space will mean more people we recommend that a more in-depth analysis to given regarding the ramifications and cumulative consequences of associated with more people, increased usage and greater traffic.

Sincerely,

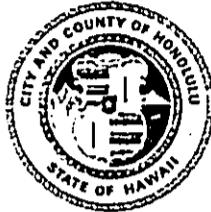

Wendy Gormaine

Raymond Holmes



DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Ms. Wendy Gormaine
Mr. Raymond Holmes
673 Ululani Street
Kailua, Hawaii 96734

Dear Ms. Gormaine and Mr. Holmes:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 20, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

The Environmental Assessment was prepared to evaluate environmental impacts resulting from modifications to existing facilities and areas and construction of needed new facilities. The Master Plan for Kailua Beach Park was not the subject of the Draft Environmental Assessment (DEA) but the Master Plan (exhibit) was included in the DEA to show the general location of the proposed improvements.

An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities. Debris from the park blown into the stream is collected and removed by parks maintenance personnel.

With the exception of the canoe halau which is proposed on the northwest bank of Kaelepulu Stream, none of the proposed improvements discussed in this Environmental Assessment will

Ms. Wendy Gormaine and Mr. Raymond Holmes
Page 2
January 10, 1996

directly affect Kaelepulu Stream. During construction of the canoe halau, Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented.

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be lined with a geotextile filter fabric to retain sediment and debris.
- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

No work within the shoreline or shoreline setback area is proposed as part of this project. The proposed improvements will have no adverse impacts on ocean waters.

After carefully reviewing all comments received during the environmental assessment process pertaining to the proposed improvements, the Department of Parks and Recreation finds that the Proposed Determination in the Draft Environmental Assessment and determination of no significant environmental impact is still valid.

Thank you for participating in the environmental assessment process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,


DONA L. HANAIKE
Director

DLH:gp

September 21, 1995

City and County of Honolulu
Department of Parks and Recreation
650 South King Street
Honolulu, Hawaii 96813

RECEIVED

'95 SEP 22 P3:57

FACILITIES

RE: DRAFT ENVIRONMENTAL ASSESSMENT/REVISED MASTER PLAN FOR
KAILUA BEACH PARK

My name is Keith Krueger and I am submitting these comments as an individual.

1. Kaelepu Stream has been in the past identified as unacceptably polluted, and it discharges into Kailua Bay during periods of heavy rainfall. The Revised Master Plan for Kailua Beach Park states that the project will result in expanded use of the park. It would seem logical to assume that increased utilization of the park will result in increased impacts upon human health. Therefore, I believe that an EIS for this project is required.

2. The Revised Master Plan is unacceptably vague. If the public is to give input on this project they must be given detailed information to respond to. A map of the proposed project containing only generalized conceptual information is insufficient. The fact that this drawing is not supported by detailed text is totally unacceptable because the public cannot address issues such as; road alignments, parking lot size and location, lighting, usage demographics, and socio-economic impacts of this plan if the information is not there to respond to.

3. It is unfortunate that the Revised Master Plan calls for the destruction of Camp Kailua. It is my understanding that the legality of such an action is in question-it would seem prudent to settle the matter before pushing forward and destroying an in place resource, and possibly incurring unnecessary and expensive legal costs.

I look forward to receiving a **DETAILED** EIS for this project since what has been presented so far is inadequate.

Sincerely,

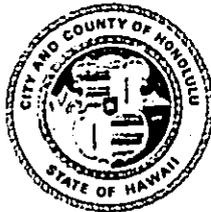


CGOEQC

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Keith Krueger
47-862C Kamehameha Highway
Kaneohe, Hawaii 96744

Dear Mr. Krueger:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 21, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

1. Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities.
2. The Environmental Assessment was prepared to evaluate environmental impacts resulting from modifications to existing facilities and areas and construction of needed new facilities. The Master Plan for Kailua Beach Park was not the subject of the Draft Environmental Assessment (DEA) but the Master Plan (exhibit) was included in the DEA to show the general location of the proposed improvements.

An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

Mr. Keith Krueger
Page 2
January 10, 1996

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp

Tina Dyer
138 Kuuahale Street
Kailua, Hawaii 96734
September 21, 1995

Department of Parks and Recreation
650 South King Street
Honolulu, Hawaii 96813

RECEIVED
1995 SEP 22 P 3: 14
DEPT. OF PARKS
& RECREATION
C. & C. OF HONOLULU

I am writing in response to the DRAFT ENVIRONMENTAL ASSESSMENT and REVISED MASTER PLAN FOR KAILUA BEACH PARK dated August 10, 1995.

I am concerned about what the purpose of the REVISED MASTER PLAN is. While the map shows quite a few changes and improvements the text speaks very little about the implications of these changes.

There is minimal discussion on water quality, environmental impacts, increased traffic and traffic congestion, impacts from more people, how many people will use the beach and how long will it take to implement all the proposed changes.

While there is lengthy discussion on Camp Kailua it is only in regard to the deteriorated condition and demolition. Over the years Camp Kailua has served as a safe beach cabin camping facility for thousands of people. Yet rehabilitation of Camp Kailua isn't even discussed other than to say it is to expensive to repair. This is a disservice to the importance of the camp to those unable to use tent camping.

The impacts of all the proposed actions should be better articulated so that the ocean and the environment is protected and the public can understand all the consequences of implementing this PLAN.

Sincerely,

Tina Dyer

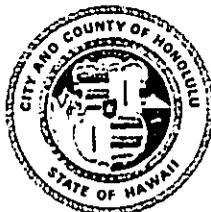
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9/22/95 JTB

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9/25

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Ms. Tina Dyer
138 Kuuhale Street
Kailua, Hawaii 96734

Dear Ms. Dyer:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 21, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

The Environmental Assessment was prepared to evaluate environmental impacts resulting from modifications to existing facilities and areas and construction of needed new facilities. The Master Plan for Kailua Beach Park was not the subject of the Draft Environmental Assessment (DEA) but the Master Plan (exhibit) was included in the DEA to show the general location of the proposed improvements.

An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

The purpose of the proposed improvements is to upgrade existing park facilities and provide facilities for use by persons with disabilities. In the case of the canoe halau, a needed facility is provided for canoeing activities. These improvements are intended to accommodate existing ocean and shoreline recreational needs of the public. ~ ~

Users at Kailua Beach Park totaled 679,385 during 1992-93 (State of Hawaii Data Book, 1994). This figure includes only

Ms. Tina Dyer
Page 2
January 10, 1996

people on the beach enumerated by lifeguard count; the number of actual park users is assumed to be greater than this figure.

A four phase development schedule is proposed. The improvements by phase are summarized below:

- Phase I Remove structures and parking lot.
- Phase II Construct site improvements to include additional parking stalls for the disabled, walkways, landscaping, and irrigation.
- Phase III Construct pavilion, halau, wheelchair storage, and picnic areas.
- Phase IV Install lighting and other miscellaneous park amenities.

Camp Kailua was used more often as a meeting place rather than as an overnight camping facility. The Kailua Recreation Center was expanded specifically to accommodate group use, primarily senior citizens who were the heaviest users of the camp facility for a meeting place. No one was deprived of a meeting place when Camp Kailua was closed.

The Department of Parks and Recreation has been charged with establishing beach and inland camping facilities on the island of Oahu. Towards this end, the Department has organized a task force to search for suitable sites for cabin camping facilities.

Waimanalo Bay Beach Park has been suggested as one site for Windward Oahu and the Department is examining another site on the North Shore. The site selection process does not include design work and cost estimates for building a facility. The DPR has been working with the School of Architecture at the University of Hawaii to design a cabin camping complex on about 20 acres of land in Waimanalo Bay Beach Park.

There are at least nine different overnight camping facilities located elsewhere on Oahu that can accommodate a total of over 1,300 people. Thus, campers have ample alternative opportunities for camping.

Ms. Tina Dyer
Page 3
January 10, 1996

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp

RECEIVED

'95 OCT -2 AM 11:16

September 28, 1995

Mr. Don Griffin, Advance Planning Branch Chief
Department of Parks and Recreation
City and County of Honolulu
650 South King Street, 9th Floor
Honolulu, Hawaii 96813

FACILITIES
PARKS & RECREATION
C & C OF HONOLULU

Subject: Kailua Beach Park Revised Master Plan

Dear Mr. Griffin:

As a resident of Kawailoa Rd. adjacent to the park for 18 years and an avid user of park facilities I welcome the opportunity to comment on the proposed master plan for Kailua Beach Park. I will restrict my comments to those proposed modifications that impact the "Lanikai side" of the park from the boat ramp to Kaelepulu Stream. In general I am in agreement with the content and scope of the master plan improvement and have only a few additional comments to make.

Regarding planning for surfaced walkways, please note that there is one paved walkway from the parking lot to the sand dunes adjacent to the beach. It would be worth while to look carefully at this walkway, noting how much sand has accreted above the original level of the walkway. This end of Kailua Beach has been accreting sand since the first coastal survey was completed 130 years ago, and one should plan on this trend continuing. Therefore any hard structures approaching the dunes will eventually be buried by sand or require continuous maintenance. Any attempt to remove or lower the sand dunes will result in a sand "break" in the dune and a continual stream of sand through the break until it is filled. The number of hard walkway surfaces in the park should be minimized.

Increased beach use during the past decade has put increased demand on park facilities. Your decision not to use the existing Camp Kailua parking lot for expanded parking is a rational way to limit park use to something near its carrying capacity.

Shower facilities at the park receive almost continuous use on weekends causing large "wetlands" to form in adjacent low areas, or a continuous stream of water into the ocean. While this water is going to waste, adjacent areas of the park are parched brown and dusty by the end of summer for a lack of irrigation. Some effort should be planned to reuse the shower water for evening irrigation.

Passive vehicle control needs to be instituted around the edges of the parking lots. There are way too many vehicles on the grass on busy weekends and it is not reasonable to assume that the police can

control this activity. One or more lockable vehicle passage ways should adequately serve the needs of permitted vehicles towing canoes during regattas.

Horse shoe playing is a common activity at the park. This activity could be promoted by installing a few permanent horse shoe pits with "official" clay surfaces around the posts. This would prevent the formation of numerous pits and mounds in the grassed areas of the park.

Kelepulu stream mouth opening needs to be coordinated with the parks department. Because of hydraulic considerations, opening of the stream mouth needs to occur within 3 days of the new or full moon and during or just before the lowest tide of the day. Pushing sand to the sides of the canal and opening the stream to the ocean near high tide merely tends to push more sand inland causing its loss from the beach system.

The bike/walkway bridge over Kelepule stream should match the existing bridge visually and in the layout of bridge supports in the stream bed.

Mechanical sand cleaning operations should be limited to the highest tidal elevation of the year. Current practices allow the tractor to pull for liter in the sand outside the littoral cell preventing the buildup of sand dunes and grass. The entire area from the boat ramp parking lot to the north was once grass. Following one rather large storm about 8 years ago the sand was blanketed with sand. Raking of this area has caused sand to be blown farther inland and has allowed colonization of the area by a dense forest of ironwood trees.

Thank you very much for the opportunity to review these plans.

Sincerely,

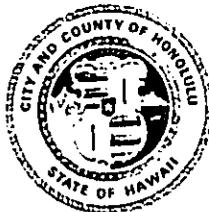


Robert E. Bourke
465 B Kawailoa Rd
Kailua, Hawaii 96734

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Robert E. Bourke
465 B Kawaihoa Road
Kailua, Hawaii 96734

Dear Mr. Bourke:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 28, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

There are no plans to either alter any existing sand dunes except for future placement of lifeguard stands. Similarly, there are no plans to construct permanent routes to the beach.

Reuse of shower water (gray water) for irrigation must be approved by the State Department of Health. This is not being proposed as part of this project but could be considered separately at a later time by the department.

We will discuss the question of passive vehicle control with the Department of Transportation Services.

Your suggestion for installing permanent horse shoe pits will be passed on to the park manager for consideration.

The Department of Public Works, City and County of Honolulu is the agency responsible for opening the mouth of Kaelepulu Stream. We will forward your suggestion to them for consideration.

We understand that the bikeway bridge over Kaelepulu Stream will match the existing bridge visually and in the layout of bridge supports in the stream.

Mr. Robert Bourke
Page 2
January 10, 1996

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



For DONA L. HANAIKE
Director

DLH:gp

RECEIVED

'95 OCT -2 10:51

FACILITIES
PARKS & RECREATION
C & C OF HONOLULU

Don Griffin, Advance Planning Branch Chief
Department of Parks and Recreation
City and County of Honolulu
650 South King Street, 9th Floor
Honolulu, HI 96813

September 20, 1995

Dear Mr. Griffin,

We the members of Save Our Bays and Beaches feel the draft environmental assessment (EA) for the revised master plan for Kailua Beach Park as currently worded will result in significant environmental impact. Our recommendation is the Department of Parks and Recreation proceed with a full Environmental Impact Statement (EIS). SOBB's mission is to protect and preserve the quality of our bays and beaches for the safe use of all who want to use them. With that in mind, we propose the following questions and concerns about the current draft EA be addressed in an EIS.

- 1) We believe the project will involve irrevocable commitment to, loss or destruction of natural resources. The effect of the proposed size of the project will affect the area much more than the current facilities. (Examples of impacting areas: Placement of the canoe halau, expanded roadways, water runoff of expanded parking)
- 2) The project fails to address the major point source pollution, Kaelepulu Stream, to the bay and does not mention any measure to mitigate this documented public health hazard.
- 3) The draft EA fails to address erosion control, watershed management and point and non-point source pollution of the master plan area.
- 4) The potential significant increase in the number of people to using the beach will greatly impact the area. In the future, without watershed management actions taken to ensure water quality, residents, commercial businesses and visitors will be adversely impacted through increased beach closures due to high levels of water pollution.

Page 2

SOBB, Kailua Master Plan EA comments continued,

- 5) Issues of public health as described in the draft EA are inaccurate and unsubstantiated by past and current water quality data collected by Dr. Roger Fujioka and associates of University of Hawaii Water Resources Research Center (who were contracted by the City and County of Honolulu) and the State Department of Health.
- 6) The EA does not address disposal of current effluent from comfort stations (restrooms) or increased boat ramp usage and the resulting discharges. Neither does it address increased user patterns for these facilities.
- 7) Since the draft EA does not provide specific and quantitative analysis on environmental quality, a negative declaration with regard to substantial degradation is impossible to assess and qualify.
- 8) Further development of the entire Kaelepulu Stream watershed area will continue to imbalance the ecosystem to the point of collapse. The draft EA does not address the current water quality and the potential increased deterioration.
- 9) The draft EA does not address the continued non-point source pollution run off of the Kailua Master Plan area and its effect on the endangered green sea turtle and other marine life in Kailua Bay.
- 10) There seems to be too little attention drawn to the unavoidable effects of construction. Questions arise as to the seeming disregard for storm drain catch nets, erosion control berms, green buffer zones or the manner in which accessible pathways will be constructed.
- 11) Kailua Beach park and its shoreline is affected by the opening and closing of Kaelepulu Stream. There is no evidence in the draft EA of examination regarding the policies of opening and closing of this waterway. There are no recommendations regarding signage and public health and safety risk assessment or awareness. This is of particular concern because of proposed increase use of the beach park after remodeling. This qualifies as an environmentally sensitive area as a tsunami, flood and erosion prone zone.

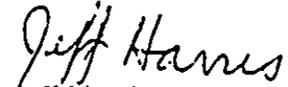
Page 3

SOBB, Kailua Master Plan EA comments continued.

Our members are concerned the EA does not fully address the already identified pollution and potential health hazards presently existing in Kaelepulu Stream and Kailua Bay which are the main focal points of Kailua Beach Park. The proposed increase of park usage, easier access to Kaelepulu Stream Area at the haiau access, p1111. and serious disregard for planned erosion and pollution control measures such as storm drain catchment systems, green buffer zones, etc., will only amplify the potential increase in environmental pollution and potential health hazards for all park users. An Environmental Impact Study must be completed to address these concerns so the community, and related agencies of the City and County of Honolulu and State of Hawaii can work together to improve the environmental conditions of the Kailua Beach Master Plan area. This would be a win-win situation for everyone!

We look forward to a response from you on these very important concerns.

Mahalo,



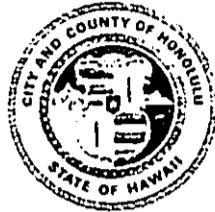
Jeff Harris
President,
Save Our Bays and Beaches
262-7622

cc: Mayor J. Harris, City and County of Honolulu
Mr. G. Gill, OEQC, State of Hawaii
Mr. S. Holmes, City Council, P.W. Chairperson
Ms. J. Schlitz, Kailua Neighborhood Board, Chairperson
State Senator Whitney Anderson
State Senator Michael Liu
State Representative Cynthia Thielen
State Representative Eve Anderson
State Representative Devon Nekoba

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K. C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Jeff Harris, President
Save Our Bays and Beaches
150 Hamakua Drive, Suite 727
Kailua, Hawaii 96734

Dear Mr. Harris:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 20, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

1. An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

With the exception of the canoe halau which is proposed on the northwest bank of Kaelepulu Stream, none of the proposed improvements discussed in this Environmental Assessment will directly affect Kaelepulu Stream. During construction of the canoe halau, Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented.

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be lined with a geotextile filter fabric to retain sediment and debris.
- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

Mr. Jeff Harris
Page 3
January 10, 1996

The Department of the Army in their comment letter dated August 22, 1995 indicated "the flood hazard information presented on Page 7 of the environmental assessment is correct."

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp



Ke aloha o ke kākou 'āina, 'Oia ka mana kū pa'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.

September 20, 1995

City and County of Honolulu
Department of Parks and Recreation
650 South King Street
Honolulu, Hawaii 96813

RECEIVED
1995 SEP 22 P 3:14
DEPT. OF PARKS
& RECREATION
C. & C. OF HONOLULU

**Kailua Beach Park Revised Master Plan
Draft Environmental Assessment**

Hawaii's Thousand Friends has the following comments on the Kailua Beach Park Revised Master Plan Draft Environmental Assessment.

SUMMARY INFORMATION and Pg. 2.

The PROPOSED USE section states "No significant adverse impacts are anticipated". Page 2 states "The proposed changes included within this revised Master Plan will have no detrimental effect on, and in fact will enhance the current use of the facility as a public beach park."

The City's 1991 City's Kailua Beach Park Master Plan proposed turning the Beach Park into one of seven "ocean recreation centers" on Oahu with the ultimate goal that the new park "be enjoyed by thousands rather than a limited number during the week and on weekends."

Has the City abandoned its plans to turn Kailua Beach Park into one of seven "ocean recreation centers" to be enjoyed by thousands? We don't believe so yet the impact of thousands more users is not discussed anywhere in the Draft EA.

The 1992-93 user population of the 30 acre park was estimated at 679,385 (pg. 11). Since then the park has expanded by 2+ acres and the demolition of Camp Kailua will add another 3 acres. The user population increase and environmental impacts associated with that increase are not discussed in the Draft EA. This is a critical omission and should have been included.

Page 3.

2.1.2 Project Physical Features

Canoe halau - While the Draft EA mentions construction of a new canoe halau near Kaelepulu Stream there is no further discussion on the size, shape or

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impact to Kaelepulu Stream. Since this structure is within the SMA conceptual drawings need to be provided.

Surfaced walkways - While the map shows an extensive network of "meandering walkway" there is no discussion on how long or wide the walkways will be, what material will be used in construction or what the finished surface will be, how much grading is required, what measures will be used to protect the coastal area from runoff during and after construction, where the sand removed to create the walkways will be placed or cumulative impact.

General route for beach access - There is no explanation as to what these are. Are they wheelchair access routes? Will grading be required and a permanent surface put down and what material will the "route" be made of? The map, identified as the REVISED MASTER PLAN FOR KAILUA BEACH PARK, shows 2 "routes" leading to and over the sand dunes yet impacts to the dunes and the coastal area are not discussed. The Draft EA does not address the cumulative impacts of grading.

Near the "exist'g pavilion" the map identifies dunes in two places with the "route" going between them. Does this mean that the existing dune will be cut to accommodate the "route"? Will the "general route for beach access" shown on the Lanikai side of the park cut through the sand dune? What are the environmental and costal impacts.

Grassed berms - While the Draft EA speaks of "grassed berms" there is no text describing what these are, the purpose, where the sand will come from to create the berms, how much grading will be required or environmental impacts.

Bikeway - The City currently has a separate SMA use permit for the entire bikeway system which goes from the boat ramp through Kailua Beach Park up Kailua Road to Hahani and up to Hamakua. Through a series of hearings and meetings the bikeway route was formulated to address community alignment concerns, meet safety criteria and SMA requirements including an acceptable bridge alignment. Does the inclusion of a portion of the bikeway in the Draft EA render the existing bikeway SMA use permit invalid?

The Draft EA addresses none of the above issues and the map just shows a new bikeway route through Kailua Beach Park. There is no text on the bridge alignment, safety concerns, impacts to the coastal zone, effect on the existing SMA use permit, impact on funding or repercussion to the route outside of Kailua Beach Park.

Pg3 & 4

2.1.3 Construction Activities

Clearing, grubbing, minor grading - Impacts from these activities are not discussed at all in this Draft EA. How much grading, clearing, and grubbing will be

done? Where will the cleared, grubbed and graded material be stored? If kept on site what precautions will be taken to guard against runoff? Will the material be taken off site? If so, deposit site and amount to be removed should be identified.

Security lighting - Will existing electrical conduits be used or is this a new system? Is the lighting for the entire beach park? What are the hours the lights will be on? What are the installation, maintenance and monthly costs? If grading, grubbing and clearing will be necessary in the installation of the lighting then the impacts from these activities needs to be discussed.

Irrigation system - Under the 1992 Negative Declaration for Construction of Maintenance-Type Improvements and existing SMA use permit upgrading, replacing and extending the irrigation system are approved activities. In reading the Draft EA we were unable to distinguish what projects have been completed, are partially done and what remains to be done. A cost breakdown for each segment and its status needs to be included.

Open pavilion - While the "open pavilion" is acknowledged in the Draft EA there is no further explanation concerning dimensions, uses etc. A detailed description needs to be provided.

Chain barrier - Where will the "chain barrier" be placed? What is the purpose of the "chain barrier"?

Pg. 4

21.5 Liquid Waste Disposal

The Draft EA does not address the type or adequacy of the present sewage system or its ability to handle the additional expected use when Kailua Beach park is transformed from a community park into a ocean recreation center. The user population will increase yet there is no consideration given to increasing sewage capacity and infrastructure.

22 Social and Recreational Characteristics

While this section is titled Social and Recreation Characteristics the main emphasis is on the demolition of Camp Kailua. Other than mentioning that physically disabled citizens frequent Kailua beach and that the new Plan accommodates the physically disabled there is no further discussion on social and recreational resources and characteristics, impacts or benefits of retaining Camp Kailua. The section just concludes that while cabin camping is a desirable social and recreational activity it is not suitable for Kailua Beach Park therefore Camp Kailua should be demolished.

This section also fails to address the social and recreational ramifications of the demolition of Camp Kailua. With the demolition of Camp Kailua residents lose the only safe beach-side cabin camping facility available to the mentally and

physically disabled, the elderly and emotionally disabled. Youth groups, drug and alcohol treatment and prevention organizations, mental health and educational groups lose a secure meeting place. The general public loses meeting rooms and kitchen facilities.

In 1990, the year before the Fasi administration closed Camp Kailua, the Camp was used by 45 social service, drug and alcohol treatment/prevention, mental health and education groups; 22 community-oriented church groups; 55 youth groups and 22 groups serving the mentally, physically or emotionally disabled. In 1990 Camp Kailua was used by over 20,000 people.

Should Camp Kailua be demolished as proposed what are the health impacts on the above groups?

Pg 6

2.3 Economic Characteristics

There is no cost breakdown for the various improvements. The 1992 NEGATIVE DECLARATION FOR CONSTRUCTION OF MAINTENANCE-TYPE IMPROVEMENTS placed the cost at \$698,000 for pavilion renovations, new water line, and upgrading irrigation system. Is the \$700,000 in addition to the \$698,000? Are the irrigation replacements etc. new or a continuation of previous projects? A cost breakdown by projects is needed? How much work was done under the existing \$698,000 allocation and how much money, if any, will be carried over to the new/continued projects?

Has the \$700,000 been appropriated? The administration continually speaks of replacing Camp Kailua with a camping facility elsewhere yet there is no mention of costs or money allocation. Should Camp Kailua be demolished is money immediately available to purchase property, fund design and planning as well as build a replacement facility?

This section should address the cost differential between restoration of Camp Kailua and the costs of building a new facility.

Presently the City is not in compliance with Federal ADA requirements. Because Camp Kailua is an existing facility it will be grandfathered in thus making it easier and less expensive to come into compliance with the Americans With Disabilities Act. This possibility is not discussed.

Pg 6

SECTION 3 Applicable Land Use Controls

While the Draft EA states that Kaelepulu Stream is designated "Preservation" the State Land Use Designation is not identified. If Kaelepulu Stream is within the Conservation District doesn't the City need to obtain a Conservation District Use Permit for the pedestrian/bikeway segment that traverses the stream? A section is needed that outlines the needed permits and the permitting process.

Pg 7

SECTION 4 Affected Environment

4.1 Topography and Soils

The last line appears contradictory to the map which shows two "General route for beach access" routes going between and near dunes. Also will existing sand dunes be used as "berms"?

Pg 8

4.4 Water Quality

This section is incomplete. While it states that "Kaelepulu Stream estuary often naturally contains too much coliform bacteria to meet State water quality standards" the Draft EA fails to address what actions are needed and will be taken to improve water quality in the stream and the near-shore waters. Since the near-shore waters are contaminated with coliform bacteria when the Kaelepulu Stream mouth is open isn't the City risking more liability by encouraging more people to use waters that are knowingly contaminated?

Pg 11

4.9 Park and Nearshore Recreational Use

While the last paragraph states that attendance for a 12-month period ending 6/30/93 was estimated at 679,385 the statement fails to provide a breakdown for weekends, holiday, summer months or large events. The count should give a day by day breakdown by use such as; how many users are tourists, windsurfers, canoe club paddlers etc.

The 679,385 user population breaks down to 1,861 persons per day. That is almost 2,000 persons a day using the 30 acre park, stream and ocean. The Draft EA's recommended demolition of Camp Kailua increases the Park acreage to 35 acres.

It is interesting to note that Haunama Bay, which is much larger than Kailua Beach Park, is limiting its user population to 2,000 persons at a time. Unfortunately Haunama Bay had to reach a crisis situation before it was realized that there is a carrying capacity limit for natural resources and the environment.

The Draft EA fails to acknowledge the limits of Kailua Beach Park and the ocean by not addressing the carrying capacity of the natural resources, infrastructure, the park environment and the nearshore waters.

Pg 12

4.11 Parking and Traffic

While the Draft EA acknowledges the shortage of parking spaces on weekends and holidays nowhere is the issue of additional parking discussed. If parking is a problem now what will happen when the additional 3 acres are Camp Kailua is opened up?

The issue of additional parking spaces is being ignored because the community is concerned that additional parking will allow tour buses and increased park use. However, ignoring the adequate parking issue only prolongs the

inevitable, which is the need for more parking spaces. Not addressing the issue in the Draft EA effectively eliminates any public discussion of the need for and impacts of increased parking and accompanying traffic problems.

The issue of tour buses must be addressed. While tour buses cannot park at the beach park they drive through and drop off tourists. What are the impacts of the tour buses? What are the impacts to the beach and facilities from bus loads of tourists. The Draft EA is deficient in addressing parking and traffic concerns.

Pg 12

SECTION 5 IMPACTS AND MITIGATION MEASURES

Under SECTION 5 only 5.1 Short-Term Impacts and 5.2 Long-Term Impacts have one subsection every other subsection is listed twice. What is the purpose of the double subsections? As written it is confusing.

5.1. Short-Term Impacts

The Draft EA needs to better describe the areas proposed for construction by project and timeline. A schedule would help evaluate cumulative environmental impacts.

5.1.1. Topography and Soils

It is obvious that substantial grading, grubbing, clearing, earth moving and soil addition will be done. Yet while acknowledging that "topography will be changed....and the addition of topsoil will change the composition of existing soil...." the Draft EA concludes that "Construction of the proposed projects will not have any significant short-term impact on the topography and soils at Kailua Beach Park".

Impacts from proposed projects individually and collectively need to be addressed in the EA.

5.1.2. Drainage and Water Quality

The types "erosion control precautions" to be used should be identified.

With the amount of earth moving and reconfiguration that is proposed we are concerned that there is not more indepth discussion regarding impacts to the water quality of the coastal zone and Kaelepulu Stream.

Also there is no discussion regarding drainage other than the comment that existing drainage patterns "will not significantly change". In light of the amount of topography reconfiguration that will take place this section is incomplete,

5.2 Long-Term Impacts

This section should address the long-term impacts of drainage, water quality, adequate infrastructure, carrying capacity of the beach park and near-shore water, inadequate parking, loss of meeting rooms and other social needs, as addressed in Section 2.2 Social and Recreational Uses, maintenance costs etc.

5.2.1 Topography and Soil

The "natural sand dunes" that are to remain unaltered should be identified since the map shows some alteration.

Pg. 16

SECTION 6 ALTERNATIVES CONSIDERED

It is interesting to note that while the Draft EA speaks of improvements and changes to the entire Kailua Beach Park, the alternatives offered speak only of the Camp Kailua site. Why weren't alternatives considered for other aspects of the Kailua Beach Park Master Plan? From this section one gets the impression that this exercise is all about the demolition of Camp Kailua. Other alternatives should be addressed.

6.1 No Action

There is no substantiating evidence to show why, under the current park layout, "integration of accessibility features" could not be added to other areas of the park. They do not appear location specific.

While the map shows a network of walkways with a "general route for beach access" in the area now covered by Camp Kailua we do not see why this network of walkways, "general route for beach access" and "accessible fitness equipment" could not be accommodate elsewhere. It seems more beneficial and convenient to locate beach accesses and accessible fitness equipment closer to the handicapped parking stalls.

It is ludicrous for the Parks Department to present the liability issue of Camp Kailua's deteriorating buildings as if they and the administration had no control over the camps facilities. After all it has been the current and the past administration who have let City Council allocated money for repair and maintenance of Camp Kailua facilities lapse. The responsibility for the poor conditions of the Camp Kailua buildings lies solely with the administration.

The statement "The surrounding community has a right to expect that it will be cleaned up..." is an accurate statement. And the responsibility for maintenance of City facilities lies with the City.

6.2 Cabin Camping at Camp Kailua

Rather than lightly brushing off the possibility of rehabilitating the buildings at Camp Kailua by stating they "would necessitate excessive restoration expenditures" this alternative should have addressed rehabilitation possibilities and costs. It has been public stated that the buildings could be refurbished for between \$700,000 to one million dollars yet this alternative isn't even discussed.

The notion that cabin camping is "an incompatible use of this urban beach area" is an outdated concept. While Kailua may be urban in nature it is not the urban core, is not slated for aggressive growth and is a 1/2 hours drive from the urban core. National trends are toward locating facilities close to population cores for convenience and to avoid long travel distances.

The Draft EA states that the City supports cabin camping in "more appropriately suited rural sites" and that a committee has been formed to locate and recommend sites. Yet before a monies have been appropriated and a location selected and purchased, if necessary, the push is on for the demolition of Camp Kailua. Why? The urgency needs to be explained.

Pg 17

SECTION 7 PROPOSED DETERMINATION

7.1 Consideration of the Project's Significance

This section is misleading because items 1-11 are not questions but criteria to be used "In determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short and long-term effects of the action" ((b)
ENVIRONMENTAL IMPACT STATEMENT RULES DEPARTMENT OF HEALTH, TITLE 11, CHAPTER 200 ADMINISTRATIVE RULES.

The Draft EA left out section §11-200-12: Significance criteria.

(a) In considering the significance of potential environmental effects, agencies shall consider the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action.

Draft EA has failed to meet the above stated criteria.

1) While we agree that the beach park itself has been altered the area identified for the hiking trail has not been similarly altered so to claim that the project will have no adverse impact is not true.

2) By eliminating safe beach-side cabin camping the project does curtail the range of beneficial uses of the environment.

3) By advocating the demolition of the only safe beach-side cabin camping facility on Oahu and perhaps in the State the project conflicts with State policy which "encourage(s) productive and enjoyable harmony between man and his environment...and stimulate(s) the health and welfare of man." HRS 344

Under HRS 344 (B) it is State policy to "Create[ing] opportunities for the residents of Hawaii to improve their quality of life..." Elimination of the only safe beach-side cabin camping facility available to the mentally, physically and emotionally disabled, youth and educational groups as well as many social service organizations denies segments of our state opportunities to improve their quality of life.

4) The Draft EA fails to address the "primary and secondary and the cumulative as well as the short and long-term effects of the action" of destroying

Camp Kailua.

Camp Kailua is the only facility on Oahu and possibly in the State that offers a safe beach-side cabin camping experience to those physically unable to take part in tent camping. Since Camp Kailua is fenced the Camp offers protection for the mentally disabled so that they may enjoy a safe beach-side camping experience.

The economic and social short and long-term consequences and cumulative impact of not having Camp Kailua available to segments of our population unable to use "conventional" facilities is not discussed in this Draft EA.

5) The Draft EA does not discuss either the economic or social short and long term impacts to public health for both the disabled persons and care-givers should Camp Kailua be demolished. Public health is at risk from poor water quality in Kaelepulu Stream and the ocean when the stream mouth is opened.

6) The City's plan to transform Kailua Beach Park from a community park into one of seven ocean recreation centers open to thousands will have substantial impacts on natural resources and physical facilities.

7) The massive grading and cutting of sand dunes poses threats to the park environment and the coastal zone. The water quality of Kaelepulu stream faces further deterioration. Impacts on the surrounding community from increased traffic is not adequately addressed.

8) The massive grading, increased traffic and changes to the parking lot could cumulative affect the park, stream and nearshore water.

9) Since the issue of the "hiking trail" was not addressed in the Draft EA we do not know if there are any rare, threatened or endangered species, their habitats or plants in the mountain area.

10) Increased user population will impact the stream and ocean water quality. The realigned roadway and increased traffic could affect air quality and will impact neighbors.

11) The Kaelepulu Stream estuary and the coastal waters will be affected by construction, increased use and increased user population.

THE MAP - 8/8/95 REVISED MASTER PLAN FOR KAILUA BEACH PARK

1. When the Department of Parks and Recreation presents its 1995 Kailua Beach Park Master Plan to the public all they are shown is this map. There is never any text to explain the Master Plan.

2. The same is true for the July 1991 Environmental Assessment and Negative Declaration for Kailua Beach Park Master Plan and the December 1992 Negative Declaration for Construction of Maintenance-Type Improvements at

Kailua Beach Park.

3. So in reality the map is the Kailua Beach Park Master Plan. The following items are shown on the map but not addressed in the Draft EA.

1. The Kailua Road entrance to the park is realigned to go along Makalii Road. (Figure 2 Site Map shows current Kailua Road access). However this new alignment, identified as Park as Park Rd/Parking, is not mentioned in the Draft EA. There is no mention of why the road is being realigned, how many trees will be removed, how the change will affect the bikeway and commercial windsurfing, how many parking stalls will be located on the road, how traffic flow and the new alignment will affect the neighbors.

2. The map shows a revamped parking lot on the left side of Kaelepulu Stream fronting the existing pavilion. (Figure 2 Site Map shows current parking configuration). Presently there is a parking area to the left and the right of the pavilion and a single lane, with parking stalls on both sides, leading out to the street. The new parking lot eliminates the two side parking areas and expands the single parking lane to 4 lanes. This configuration brings the impermeable parking area closer to Kaelepulu Stream yet the EA/Plan does not mention the reconfiguration or its impacts. The new parking set up appears to encroach onto the existing fitness equipment area yet relocation of the equipment is not mentioned.

3. The structure near the halau should be identified.

4. The map only shows one lifeguard station at the Camp Kailua end of the park. Does this mean that other lifeguard stations will be eliminated? Public safety is of great concern and with the expanded park and increased use we advocate more lifeguards not less.

5. The map identifies the canoe halau with access for disability but there is no text to explain what type of access will be provided.

6. The map shows 2 "general route for beach access" but there is no explanation of what the purpose is. If these are the routes for "beach mats & beach wheelchair" then the route on the Lanikai side of the map is an extremely long distance from both the equipment storage area and the new handicap parking stalls.

7. The map identifies a "hiking trail" yet there is neither text nor lines to identify where the trail begins and ends. There is no discussion of trail ownership, maintenance or impact on neighbors.

For the above reasons we find this Draft Environmental Assessment for Revised Kailua Beach Park Master Plan deficient and recommend that an EIS be done.

Submitted by Hawaii's Thousand Friends

Contact: Donna Wong

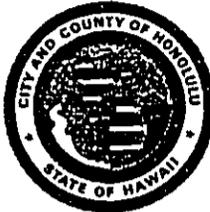
CC: Office of Environmental Control
Representative Cynthia Thielen
Representative Eve Anderson
Councilmember Steve Holmes

Senator Mike Liu
Representative Devon Nekoba
Councilmember John Henry Felix

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

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

Dear Ms. Wong:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 20, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

SUMMARY INFORMATION

The proposed action was summarized in Section 1 SUMMARY INFORMATION and described in Section 2 GENERAL DESCRIPTION OF THE PROJECT.

Developing Kailua Beach Park into an ocean recreation center is not part of the proposed action.

2.1.2 Project Physical Features

Canoe halau

The halau will be designed as an unenclosed, free standing structure of approximately 3,375 square feet (45' X 75'). The structure is about 15 feet in height and topped with a modified hip roof. The number of canoes to be stored at the halau will be determined by the Department of Parks and Recreation. Use regulations will be promulgated at a later time.

Surfaced Walkways

Approximately 2,000 lineal feet of walkways are proposed within City-owned properties. Walkways will be approximately 6-8 feet in width and constructed of hard surface material.

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Grades will be established in compliance with Americans with Disabilities Act (ADA) requirements.

Walkways will provide ADA access from the parking lot to various areas of the park and facilities as well as provide for passive strolling.

General route for beach access

The "general route for beach access" labeled on the Master Plan exhibit identifies the two existing routes to the beach commonly used by most people. The routes consist of sand, grass, or a combination thereof. There are no plans to construct permanent routes to the beach.

No impacts on coastal sand dunes are anticipated.

Grassed berms

Berms are topographically contoured design features used to add interest and visual relief, define or shape spaces in the landscape, provide users with a sense of place, and control irrigation and runoff. Berms are usually covered with grass and low in height. The source of berm material will be determined when the project is designed.

Bikeway

The bikeway through Kailua Beach Park is 10 feet wide with an asphaltic concrete surface. It crosses Kaelepulu Stream on a separate bridge placed about 3 feet makai of the existing Kawaihoa Road bridge. The concrete bikeway bridge is 10 feet wide and approximately 220 feet long.

The Master Plan shows a segment of the bikeway (approximately 200 lf) passing through the grounds of the former Camp Kailua site about 20 feet outside the right-of-way of Kawaihoa Road. The approved Special Management Permit for the bikeway placed this section along the edge of Kawaihoa Road. Placing this section of the alignment inside the park grounds is proposed for safe cycling purposes.

The Department of Parks and Recreation will consult with the Department of Transportation Services (DTS) about the change in alignment. If the conceptual realignment is approved by the City Council, the DTS will submit a "request for minor modification" to the approved Special Management Area permit for the bikeway.

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The bikeway drawn on the Master Plan is a depiction of the general alignment and not intended to be a precise layout.

2.1.3 Construction Activities

Clearing, grubbing, minor grading

Between 3.6-4.0 acres will be cleared and graded. This estimate includes the former Camp Kailua area, building sites for the canoe halau and pavilion, walkways, and picnic sites. Excavation for irrigation pipe and electrical conduits is required. Utility trenches will be restored to pre-construction conditions and no grading is anticipated. The amount of soil to be excavated is not expected to be significant. Excavated material will either be reused elsewhere in the beach park as part of other projects or removed from the site in accordance with regulations governing such action.

Construction debris will be hauled to Waimanalo Gulch for disposal and green waste to a private recycling facility at Barbers Point.

The types of erosion control measures to be implemented during construction depend in part on what is being built, its exact location, the amount of area to be exposed, duration of construction, and grubbing and grading requirements. Measures will be specified on construction plans and job specifications and executed according to Best Management Practices (BMPs).

Security Lighting

Lighting will be installed along walkways and selected areas within the park. New conduits will be installed for the walkway lights. Installation, operating, and maintenance costs will be determined during the design and engineering for the lighting system.

Irrigation system

Landscape irrigation systems will be installed in areas of the park which are now lacking an automatic irrigation system. This would include the new picnic areas and existing lawn areas.

Open pavilion

The open pavilion will be centrally located with respect to improvements proposed on the Lanikai end of the park. The

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pavilion, which is envisioned as a free-standing, unenclosed structure, would be approximately 2,400 square feet in size (60' X 40'), 15 feet in height, and topped by a Hawaiian style hip roof. No comfort station or kitchen facility is planned.

Chain Barrier

The chain barrier is a continuation of an existing chain barrier along Kawaihoa Road. The purpose of the chain barrier is to prevent parking on the grass within the park.

2.1.5 Liquid Waste Disposal

The pavilion and comfort station are connected to a sanitary sewer system. Six-inch collection lines from the above structures connect to a municipal line (21") along Makalii Road and Kawaihoa Road, respectively. The existing system is adequate to handle wastewater from the pavilion and comfort stations.

There is no need to increase capacity at this time as there is no intent to increase park usage.

2.2 Social and Recreational Characteristics

Camp Kailua was used more often as a meeting place rather than as an overnight camping facility. The Kailua Recreation Center was expanded specifically to accommodate group use, primarily senior citizens who were the heaviest users of the camp facility for a meeting place. No one was deprived of a meeting place when Camp Kailua was closed.

There are at least nine different overnight camping facilities located elsewhere on Oahu that can accommodate a total of over 1,300 people. Thus, campers have ample alternative opportunities for camping. Further, although it was open to everyone, Camp Kailua was never designed nor built to standards for accommodating the specialized needs of the disabled; nor was it ever intended to be exclusively for use by the disabled. It is important to also realize that Camp Kailua has been closed to the public since 1991 and it is impossible to meaningfully assess impacts on various groups who have not been able to use the facility since that time.

The purpose of the Environmental Assessment is to evaluate impacts resulting from improvements to Kailua Beach Park. It is beyond the scope and intent of the Assessment to assess all

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social, recreational, and health impacts on all groups when Camp Kailua is demolished.

2.3 Economic Characteristics

Construction monies have not yet been appropriated. The \$700,000 is a preliminary estimate for the proposed improvements. Actual costs estimates will be refined to a line item level of detail during the design and engineering of the project. If additional funds are required, the Department will request funds through the City's CIP process. The cost for planning and engineering is estimated at \$100,000.00 and is in addition to the estimated construction cost.

The purpose of the proposed improvements is to upgrade existing park facilities and provide facilities for use by persons with disabilities. In the case of the canoe halau, a needed facility is provided for canoeing activities. These improvements are intended to accommodate existing ocean and shoreline recreational needs of the public.

SECTION 3 Applicable Land Use Controls

Kaelepulu Stream mauka of the Kawaihoa Road bridge is in the state land use Conservation district. Stream lands makai of the bridge are in the Urban district. A CDUA is not required for construction of the segment of the bikeway traversing Kaelepulu Stream.

SECTION 4 Affected Environment

4.1 Topography and Soils

Sand dunes along the beach will remain and are not the new grassed berms referenced in the EA. There are no plans to alter any existing sand dunes except for future placement of lifeguard stands.

4.4 Water Quality

Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities.

Debris from the park blown into the stream is collected and removed by parks maintenance personnel.

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4.9 Park and Nearshore Recreational Use

The user census is a projection of annual users based on beach use counts taken by water safety officers. The count does not distinguish beach use by windsurfers, canoe paddlers, locals, or tourists, and does not include park patrons who do not use the beach.

This project does not warrant a study of carrying capacity. None of the proposed improvements are intended to increase users of the park.

4.11 Parking and Traffic

Future users will have to find parking within parking lots inside the park or park outside the park. There are a sufficient number of parking stalls within the park to serve users on weekdays. However, weekend parking demand exceeds the available parking spaces within the park. Illegal parking is common on weekends within the makai portion of the park and abutting streets and many choose to park on the grassy shoulder of Kawaihoa Road.

The need to provide additional parking should not result in reduced park space. The lack of parking itself is a limiting factor on the number of people who will use the park.

No tour bus parking will be allowed.

SECTION 5 IMPACTS AND MITIGATION MEASURES

5.1 Short-Term Impacts

Demolishing the existing structures at Camp Kailua and clearing the site of debris should take about 30 days. Demolition activities will raise fugitive dust, create noise, and intermittently impede traffic on nearby roads as debris is hauled away from the site. Prior to demolition, a hazardous material assessment will be conducted. If hazardous materials are discovered in the building materials or on the premises, they will be removed by licensed hazardous waste contractors. Construction debris will be hauled to Waimanalo Gulch or a private disposal site in Nanakuli.

Fugitive dust can and will be controlled by sprinkling water over debris and exposed areas or by the application of other dust suppression measures stipulated in Chapter 60 (Air Pollution Control) of Title 11, Administrative Rules of the State Department of Health.

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Construction noise will be most pronounced during demolition and clearing and pouring of the concrete building pads for the halau and pavilion.

Allowable daytime noise levels by zoning district is set by the State Department of Health. The allowable daytime noise level is 55 dBA for parks measured at the property line. Construction work will temporarily exceed this standard and, per Administrative Rules (Chapter 43) of the Department of Health, the Contractor will obtain a noise permit prior to construction. Construction will be limited to normal working hours of between 7:00 a.m. and 3:30 p.m. five days a week.

Vegetation will be removed to make way for the proposed improvements. In the event prominent trees are adversely affected by an improvement or construction vehicles, the trees will be flagged for removal and replanting elsewhere on the premises or relocated to another city project. Green waste will be transported to Barbers Point for recycling or disposal by a private contractor.

Adverse impacts on vehicle circulation are not anticipated. No work in the road right of way is anticipated thus there should be no need to reroute through traffic on roads adjoining the park. In addition, most of the construction work will take place on-site and the movement of men and materials will be scheduled for non-peak traffic hours.

A four phase development schedule is proposed. The improvements by phase are summarized below:

- Phase I Remove structures and parking lot.
- Phase II Construct site improvements to include additional parking stalls for the disabled, walkways, landscaping, and irrigation.
- Phase III Construct pavilion, halau, wheelchair storage, and picnic areas.
- Phase IV Install lighting and other miscellaneous park amenities.

5.2.1 Topography and Soil

Sand dunes along the beach will remain and are not the new grassed berms referenced in the EA. There are no plans to alter any existing sand dunes except for future placement of lifeguard stands.

5.1.2 Drainage and Water Quality

The types of erosion control measures to be implemented during construction depend in part on what is being built, its exact location, the amount of area to be exposed, duration of construction, and grubbing and grading requirements. Measures will be specified on construction plans and job specifications and executed according to Best Management Practices (BMPs).

Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented during construction of the canoe halau:

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be lined with a geotextile filter fabric to retain sediment and debris.
- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

5.2 Long-Term Impacts

There is no need to increase sewage capacity at this time as there is no intent to increase park usage.

No work within the shoreline or shoreline setback area is proposed as part of this project. The proposed improvements will have no adverse impacts on ocean waters.

Future users will have to find parking within parking lots inside the park or park outside the park. There are a sufficient number of parking stalls within the park to serve users on weekdays. However, weekend parking demand exceeds the available parking spaces within the park. Illegal parking is common on weekends within the makai portion of the park and abutting streets and many choose to park on the grassy shoulder of Kawaihoa Road.

The need to provide additional parking should not result in reduced park space. The lack of parking itself is a limiting factor on the number of people who will use the park.

No tour bus parking will be allowed.

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Camp Kailua was used more often as a meeting place rather than as an overnight camping facility. The Kailua Recreation Center was expanded specifically to accommodate group use, primarily senior citizens who were the heaviest users of the camp facility for a meeting place. No one was deprived of a meeting place when Camp Kailua was closed.

Camp Kailua has been closed to the public since 1991 and it is impossible to meaningfully assess impacts on various groups who have not been able to use the facility since that time.

The purpose of the Environmental Assessment is to evaluate impacts resulting from improvements to Kailua Beach Park. It is beyond the scope and intent of the Assessment to assess all health and social impacts on all groups when Camp Kailua is demolished.

5.2.1 Topography and Soil

"Natural sand dunes" will not be altered as part of this project.

SECTION 6 ALTERNATIVES CONSIDERED

6.1 No Action

The proposed improvements will add accessible features to the park. Since 1982, when the city first purchased the Camp Kailua land, the stated purpose for its acquisition was for more open park space for use by the general public. It was on that basis that money was appropriated and spent to acquire the land. The poor condition of the buildings are due to their age not any neglect by the city. The buildings were in poor condition when the city purchased the land. In fact, the stated reason by the Methodist Church for selling the property was the dilapidated condition of the camp and the expense to maintain and upkeep the facility.

6.2 Cabin Camping at Camp Kailua

The Department of Parks and Recreation has been charged with establishing beach and inland camping facilities on the island of Oahu. Towards this end, the Department has organized a task force to search for suitable sites for cabin camping facilities.

Waimanalo Bay Beach Park has been suggested as one site for Windward Oahu and the Department is examining another site on the North Shore. The site selection process does not include

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design work and cost estimates for building a facility. The DPR has been working with the School of Architecture at the University of Hawaii to design a cabin camping complex on about 20 acres of land in Waimanalo Bay Beach Park.

Monies have not yet been appropriated to acquire, plan, and build new camping facilities. The Department of Parks and Recreation is searching for alternative locations for inland and beach camping facilities. Because a site or sites have not yet been selected, cost estimates of providing alternative camping sites are not yet available.

SECTION 7 PROPOSED DETERMINATION

After carefully reviewing all comments received during the environmental assessment process pertaining to the proposed improvements, the Department of Parks and Recreation finds that the Proposed Determination in the Draft Environmental Assessment and determination of no significant environmental impact is still valid.

The MAP-8/8/95 REVISED MASTER PLAN FOR KAILUA BEACH PARK

1. and 2. An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

3. The structure adjacent to the halau is an existing trash enclosure.

4. The number and placement of lifeguard stands will be determined by water safety officers. Although one lifeguard station is depicted on the Master Plan, other stands will be placed at locations that provide satisfactory water safety coverage.

5. Access for disability should have been labeled "accessibility route" or "ADA access".

6. The "general route for beach access" labeled on the Master Plan exhibit identifies the two existing routes to the beach commonly used by most people. The routes consist of sand, grass, or a combination thereof. There are no plans to construct permanent routes to the beach.

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7. A hiking trail is not part of the proposed project. An old trail that exists on the mauka side of Alala Point is still depicted and may one day be improved. However, improvement to this trail are not being planned or proposed at this time.

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



For DONA L. HANAIKE
Director

DLH:gp



LIFE OF THE LAND

To: Gary Gill
Office of Environmental Quality Control
220 South King Street
Central Pacific Plaza, Suite 400
Honolulu, HI 96813

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'95 SEP 22 P1:27

OFC. September 22, 1995
QUALITY CONTROL

File
-39-

Re: Environmental Assessment (EA) : Kailua Beach Expansion

A) Environmental Assessments (EAs) are designed to determine whether a given project triggers any of the significance criteria of Hawaii Revised Statutes (HRS) § 11-200-12, which would thus necessitate the completion of a full-blown Environmental Impact Statement (EIS). The purpose of the EA is at the front-end of a project, to fully analyze potential problems for that given project. That is, the EA is supposed to be an objective analysis of potential problems.

§ 11-200-12. Significance Criteria. (a) In considering the significance of potential environmental effects, the agencies shall consider the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action.

(b) In determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short and long-term effects of the action. In most instances, an action shall be determined to have a significant effect on the environment if it:

- (5) Substantially affects public health;
- (7) Involves a substantial degradation of environmental quality;
- (8) Is individually limited but cumulatively has considerable effect on the environment or involves a commitment for larger actions;
- (10) Detrimentially affects air or water quality or ambient noise levels;

B) The Kailua Beach Expansion EA is a poorly constructed analysis (a white-wash) that overlooks several points. In its present state, this EA requires a full-blown EIS. The need for an EIS is at least in part due to the inadequacy of the EA. There are several serious shortcomings of the EA, some of which triggers the need for an EIS under § 11-200-12.

C) The first reaction most environmentalists would have on the expansion of the Kailua Beach Park is "how will this action affect Kaelepulu Stream." After all, it is well known that this stream is heavily polluted. The City and County of Honolulu has made the argument that the pollution in Kailua Bay is from non-point sources entering the Bay from the Kailua Channel, the Kaelepulu Stream and the Waimanalo Stream. ** (Sewage Isn't the Culprit Fouling Kailua Beach -- a letter by Cheryl Okuma-Sepe, Deputy Director of the City and County of Honolulu's Department of Wastewater Management. Star Bulletin. April 19, 1995, page A-19; and Water Resources Research Center Study Says Kailua Bay Pollution not from Mokapu Outfall but from many sources. Star Bulletin. February 6, 1992, page A-3). Lets look at the sum total of comments made by the EA on this matter.

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2.1.2 The new canoe halau will be constructed near the banks of Kaelepulu Stream...

3. Kaelepulu Stream mauka of the Kawailoa Road bridge ... are classified within the "Conservation District." ... and all of Kaelepulu Stream is designated as "Preservation." Mauka of the Kawailoa Road Bridge, Kaelepulu Stream ... are designated within floodway Zone AE ...

4.3 Prior to 1965, Kaelepulu Stream ... K[a]lelepulu Stream is the only surface water resource in Kailua Beach Park.

4.4 Because of the nature and composition of inland runoff and poor circulation, the Kaelepulu Stream estuary often naturally contains too much coliform bacteria to meet State water quality standards. This affects the nearshore water quality in the vicinity of the stream whenever the stream mouth is opened and its waters drain into Kailua Bay.

4.8 There is a scenic view from the Kawailoa Road bridge of the shoreline at the Kaelepulu Stream mouth.

4.9 Outrigger canoes have first priority for use of shore waters abutting 100 feet of shoreline at the mouth of the Kaelepulu Stream.

5.2.2 Because of its proximity to Kaelepulu Stream, construction of the canoe halau will be carefully monitored to prevent runoff from construction activities.

This is obviously inadequate. There is an absence of information about the important questions. How will this project affect the stream? Will either the new halau or the parking expansion increase non-point source pollution entering the stream from the park? Will an increase of people using the park affect the stream? Are signs along the Stream adequate in notifying the public about dangers? Since the EA omits any environmental analysis of the expansions effect on Kaelepulu Stream, an EIS is automatically warranted under triggers 5, 7, 8 and 10 (§11-200-12).

A technical and legal point must also be raised. In an on-going debate over an after-the-fact seawall constructed on the North Shore, the City & County of Honolulu's Department of Land Utilization expressed concern over liability issues if the wall fell and hurt someone. That is, by approving the wall, the City and County of Honolulu would assume part liability, and would be the deep pocket in any suit. By similar inference, if the City and County of Honolulu build a halau at the edge of the Kaelepulu Stream, then the City and County of Honolulu may be assuming additional liability for any health effects experienced by boaters "caused" by contact with the Stream.

D) The environmental assessment talks about the expansion of open space. This implies that the amount of open space will increase. Yet nowhere in the EA is this statement made explicitly. In fact, references to the new construction are explicitly left out of key sections.

§ 2.1. Technical Characteristics. The Revised Mater Plan for Kailua Beach Park allows for expansion of the beach park into a three-acre parcel acquired to provide more open space for the general public. Modifications to Kailua Beach Park include demolition of existing camp structures, construction of a new pavilion and canoe halau, a new picnic area, pedestrian walkways, realignment of the bikeway, and other modifications to existing facilities to provide for equal accessibility to the beach park, its facilities and recreational opportunities.

There is no mention of the expansion of the parking lot in §2.1. The EA discusses the parking lot in § 2.1.2 "... modifications to the ... existing parking lot." Only later, in §5.1.5, does the EA explain the nature of the parking lot alterations: "expansion of the existing parking lot." Perhaps this paving over of open space is intentionally delayed in the EA. That raises the question: Is the open

space being expanded or are the structures (buildings, parking areas) existing on the site merely changing from one format to another?

E) The logic in § 2.2 Social and Recreational Characteristics escapes me.

Accordingly, the existing Mater Plan for Kailua Beach Park calls for the former camp area to become open space. Objections to the demolition of the camp have been raised by persons who feel the facility was suited for use by the disabled, the disadvantaged, and the elderly, and that the relative calm waters of Kailua Beach are well-suited for use by that unique population. They have made the argument that the removal of the camp would unfairly penalize such persons. These views notwithstanding, the absence or presence of the facility serving both disabled and non-disabled populations affect both equally. Therefore, neither population is exclusively served nor penalized.

In order for the "logic" to be sound, it must be sound in all cases. If it works for some cases and not for other cases then it is not "logic." Lets look at a different set of facts, but with the same "logic."

Accordingly, the existing Mater Plan for No State Government calls for the state government office area to become open space. Objections to the demolition of the state government offices have been raised by persons who feel the facility was suited for use by the senators, the representatives, and the Governor, and that the relative political waters of downtown are well-suited for use by that unique population. They have made the argument that the removal of the state government offices would unfairly penalize such persons. These views notwithstanding, the absence or presence of the facility serving both government and non-government populations affect both equally. Therefore, neither population is exclusively served nor penalized.

Obvious bull. What is important is the number of alternatives which exist for each group.

F) The alternatives considered section is curious. Why include an alternatives considered section, when it is obvious that no alternatives were analyzed?

Section 6: Alternatives Considered.

6.1 No Action. ... the old camp continues to deteriorate and presents a liability risk to the City..... It represents a loss of open space and is a visual blight. The surrounding community has a right to expect that it will be cleaned up, and the general public should have it returned for their general use. For these reasons, the no action alternative is unacceptable.

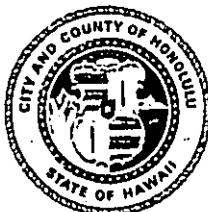
6.2 Cabin Camping at Camp Kailua. ... This alternative does not agree with the City's long-established and publicly stated intentions...

There are references to the rights of the surrounding community and the general public. Were they polled? The City Council is on record as being against the project. Is not the City Council position a representation of the public's attitude?

In summary, serious questions linger after reading and re-reading the EA. Why did the Kaelepulu Stream receive such scant coverage? Is the City and County of Honolulu expanding "open space", or are they covering up the real reason? Why is the logic in this EA so convoluted? Why are the alternatives dismissed out of hand? An EIS is clearly required!!

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 18, 1996

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

96 JAN 19 P1:23

RECEIVED

Life of the Land
1111 Bishop Street, Suite 511
Honolulu, Hawaii 96813

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

Thank you for the comments in your September 22, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

- A. Comment considered. No response required.
- B. Comment considered. No response required.

C. Department of Parks and Recreation facilities at the beach park do not contribute to pollution of the stream. No leaks in wastewater lines from the pavilion or the comfort station have been detected thus untreated wastewater is not seeping into the stream from municipal facilities. Debris from the park blown into the stream is collected and removed by parks maintenance personnel.

During construction of the canoe halau, Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented.

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be lined with a geotextile filter fabric to retain sediment and debris.
- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

Life of the Land
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D. Section 2.1 Technical Characteristics briefly mentioned the scope of proposed improvements with further elaboration of individual improvements in Section 2.1.2 Project Physical Features.

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Expansion of open space is mentioned in the above referenced sections.

An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

Parking lot expansion is limited to the parking lot off Kawaihoa Road. Approximately eight (8) additional parking stalls will be provided at this location for use by disabled persons.

E. Comment considered. No response necessary.

F. Section 6 of the Draft Environmental Assessment discussed the No Action alternative and Alternatives to Cabin Camping at Kailua.

No polling was conducted as part of the Environmental Assessment. The proposed project requires a Major Special Management Area permit and the merits of the project as it pertains to Special Management Area objectives and policies will be discussed by the City Council. We are not certain if "the City Council is on record as being against the project" as you assert, or if the City Council disagrees only with certain elements of the project.

After carefully reviewing all comments received during the environmental assessment process pertaining to the proposed improvements, the Department of Parks and Recreation finds that the Proposed Determination in the Draft Environmental Assessment and determination of no significant environmental impact is still valid.

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January 18, 1996

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



for DONA L. HANAIKE
Director

DLH:gp

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
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JEREMY HARRIS
MAYOR



DONA L. HANAIKE
DIRECTOR

ALVIN K.C. AU
DEPUTY DIRECTOR

January 10, 1996

Mr. Jeff Harris, President
Save Our Bays and Beaches
150 Hamakua Drive, Suite 727
Kailua, Hawaii 96734

Dear Mr. Harris:

Subject: Draft Environmental Assessment
Revised Master Plan for Kailua Beach Park

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

96 JAN 19 P1:23

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Thank you for the comments in your September 20, 1995 letter concerning the subject Environmental Assessment. In response to your comments we offer the following:

1. An outdated version of the Master Plan drawing was inadvertently included in the DEA. The Department of Parks and Recreation's current Master Plan proposes no realignment of the entry road to Makalii Road and no modification to the parking lot near the pavilion as was depicted in the drawing included in the DEA. The correct Master Plan is included in the Final Environmental Assessment.

With the exception of the canoe halau which is proposed on the northwest bank of Kaelepulu Stream, none of the proposed improvements discussed in this Environmental Assessment will directly affect Kaelepulu Stream. During construction of the canoe halau, Best Management Practices (BMPs) will be implemented to prevent construction runoff. The measures listed below are suggestive of actions that could be implemented.

- o Constructing a temporary berm with detention basin between the project site and the stream to intercept stormwater runoff. The detention basin will be lined with a geotextile filter fabric to retain sediment and debris.
- o Placing silt curtains along the stream bank and the construction site.
- o Avoiding work during inclement weather.

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2. No improvements or actions within Kaelepulu Stream are proposed as part of the proposed project.

3. Identifying and addressing erosion control, watershed management, and point and non-point source pollution of the master plan area (emphasis added) is beyond the scope of this Environmental Assessment.

4. No response.

5. The Environmental Assessment reported that the Kaelepulu Stream estuary often naturally contains too much coliform bacteria to meet State water quality standards. The estuary extends inland as far as Kaelepulu Pond and the Kawainui Canal and these waters too probably exceed State water quality standards for coliform bacteria.

6. The pavilion and comfort station are connected to a sanitary sewer system. Six-inch collection lines from the above structures connect to a municipal line (21") along Makalii Road and Kawaihoa Road, respectively. The existing system is adequate to handle wastewater from the pavilion and comfort stations.

There is no need to increase capacity at this time as there is no intent to increase park usage.

7. The Draft Environmental Assessment adequately summarizes potential impacts resulting from the proposed project.

8. A water quality study of Kaelepulu Stream, Kaelepulu Pond, and the Kawainui Canal and the potential for increased deterioration of these water resources is beyond the scope of this Environmental Assessment.

9. A study of marine life in Kailua Bay is beyond the scope of this Environmental Assessment.

10. The types of erosion control measures to be implemented during construction depend in part on what is being built, its exact location, the amount of area to be exposed, duration of construction, and grubbing and grading requirements. Measures will be specified on construction plans and job specifications and executed according to Best Management Practices (BMPs).

11. The opening and closing of Kaelepulu Stream is not the subject of this Environmental Assessment.

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The Department of the Army in their comment letter dated August 22, 1995 indicated "the flood hazard information presented on Page 7 of the environmental assessment is correct."

Thank you for participating in the environmental assessment review process. If you have any questions please contact Donald Griffin of our Advance Planning Branch at 527-6324.

Sincerely,



DONA L. HANAIKE
Director

DLH:gp