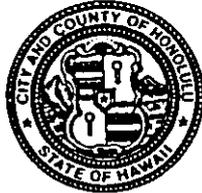


Submarine fiber optic cable landing at Makaha & Sandy Beach

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813 • (808) 523-4432

JEREMY HARRIS
MAYOR



PATRICK T. ONISHI
DIRECTOR

LORETTA K.C. CHEE
DEPUTY DIRECTOR

96/SV-004 (DT)
96/SV-005 (DT)
96-05751

September 26, 1996

The Honorable Gary Gill, Director
Office of Environmental Quality Control
220 South King Street, 4th Floor
State of Hawaii
Honolulu, Hawaii 96813

Dear Mr. Gill:

CHAPTER 343, HRS
Environmental Assessment/Determination
Finding of No Significant Impact

Recorded Owners: State of Hawaii (Keawaula) and City and County of Honolulu (Sandy and Makaha Beaches)
Applicant : GST Pacwest Telecom Hawaii, Inc.
Agent : R.M. Towill Corporation
Location : Sandy Beach, Makaha Beach, and Keawaula, Oahu
Tax Map Keys : 3-9-12: por. 02, 3-9-10: por. 03, 8-4-01: por. 12, and 8-1-01: por. 18
Request : Shoreline Setback Variances
Proposal : To install fiber optic cable landing sites at the above locations using existing GTE Hawaiian Tel manholes and ductlines
Determination : A Finding of No Significant Impact is issued

Attached and incorporated by reference is the Final Environmental Assessment (FEA) prepared by the applicant for the project. Based on the significance criteria outlined in Chapter 200, State Administrative Rules, we have determined that preparation of an Environmental Impact Statement is not required.

The proposal at Sandy Beach is exempt from Chapter 25, Revised Ordinances of Honolulu, as the cable will be utilizing existing GTE Hawaiian Tel manholes and ductlines.

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

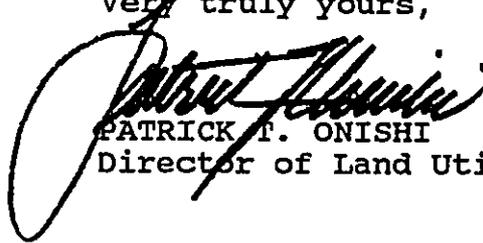
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The Honorable Gary Gill, Director
Page 2
September 26, 1996

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the FEA. If you have any questions, please contact Dana Teramoto of our staff at 523-4648.

Very truly yours,



PATRICK T. ONISHI
Director of Land Utilization

PTO:am
Encl.

g:feapacw.djt

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

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OCT 8 1996
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PREPARED IN ACCORDANCE WITH REQUIREMENTS OF CHAPTER 343, HAWAII REVISED STATUTES

FINAL ENVIRONMENTAL ASSESSMENT AND
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
**Submarine Fiber Optic Cable Landing
at Sandy Beach Park, Oahu**
HAWAIIAN ISLAND FIBER NETWORK (HI FiberNet)

AUGUST 1996

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DEPT. OF LAND UTILIZATION
CITY & COUNTY OF HONOLULU~~

PREPARED FOR:
GST Pacwest Telecom Hawaii, Inc.
91-238 Kalaeloa Blvd., Suite 100
Kapolei, Hawaii 96707

RMTC
R. M. TOWILL CORPORATION
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii • 96817-4941
Voice: (808) 842-1133
Facsimile: (808) 842-1937

OFFICE OF PUBLIC
QUALITY

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FINAL ENVIRONMENTAL ASSESSMENT AND
FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Submarine Fiber Optic Cable Landing at Sandy Beach Park, Oahu

HAWAIIAN ISLAND FIBER NETWORK
(HI FiberNet)

AUGUST 1996

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DEPT. OF LAND UTILIZATION
CITY & COUNTY OF HONOLULU~~

Prepared for:
GST Pacwest Telecom Hawaii, Inc.
91-238 Kalaeloa Blvd., Suite 100
Kapolei, Hawaii 96707

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SEP 13 1996
DEPT OF LAND UTILIZATION
650 S KING ST. 7th FL.
HONOLULU, HI 96813

Prepared by:
R. M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817-4941

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PROJECT SUMMARY

Project: Hawaiian Island Fiber Network (HI FiberNet)

Applicant: GST Pacwest Telecom Hawaii, Inc.
91-238 Kalaeloa Blvd., Suite 100
Kapolei, Hawaii 96707
Contact: Mr. Robert Volker, General Manager
Telephone: (808) 682-5123

Agent: R. M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817
Contact: Brian Takeda or Chester Koga
Telephone: (808) 842-1133

Accepting Authority: City & County of Honolulu
Department of Land Utilization

PROJECT SITES

SANDY BEACH PARK, OAHU

Tax Map Key: 3-9-12:2

Location: Sandy Beach Park, Oahu

Owner: Department of Parks and Recreation
City and County of Honolulu
2015 Kapiolani Blvd.
Honolulu, Hawaii 96817

Existing Land Uses: Recreational Area, Beach Park

State Land Use District: Preservation

County Zoning Designation: P-1

SECTION 1
INTRODUCTION

1.1 PURPOSE AND OBJECTIVES

GST Telecom Inc., is a competitive access provider (CAP) that builds and operates metropolitan area networks in the western United States including Hawaii. GST Pacwest-Telecom Hawaii, Inc., a subsidiary of GST Telecom Inc., proposes to develop an interisland submarine fiber optic cable system which will link the Islands of Kauai, Oahu, Maui, Lanai, Molokai and Hawaii. The GST network will be largest in the State and the first to connect Molokai and Lanai with the other major islands.

In the early 1990's, GTE Hawaiian Tel installed the first interisland fiber optic cable system to enhance its existing interisland radio system. Information for this environmental assessment is derived from earlier reports written for GTE Hawaiian Tel by R. M. Towill Corporation (*January 1993, Environmental Assessment for the GTE Hawaiian Tel Interisland Fiber Optic Cable System; Wailua Golf Course Kauai; Sandy Beach Park, Oahu; Mokapu Beach, Maui; Spencer Beach Park, Hawaii*).

The proposed system will include three interisland submarine cable segments with eight landing sites (**Figure 1-1**). The main system will include a 24 strand fiber optic cable with linkages between Wailua Golf Course, Kauai, and Makaha Beach, Oahu; Makaha Beach to Keawaula, Oahu; Sandy Beach, Oahu, to Mokapu Beach, Maui; and, Mokapu Beach to Spencer Beach, Hawaii. On the Sandy Beach to Mokapu Beach segment, two branching units comprised of up to 8 fiber optic strands will "Branch" off from the main line to connect to landings at Manele Bay, Lanai, and Kaunakakai, Molokai.

GST Pacwest Telecom Hawaii, Inc., is requesting shared use of existing GTE Hawaiian Tel manholes and ductlines to land and connect the terrestrial portion of its interisland fiber optic

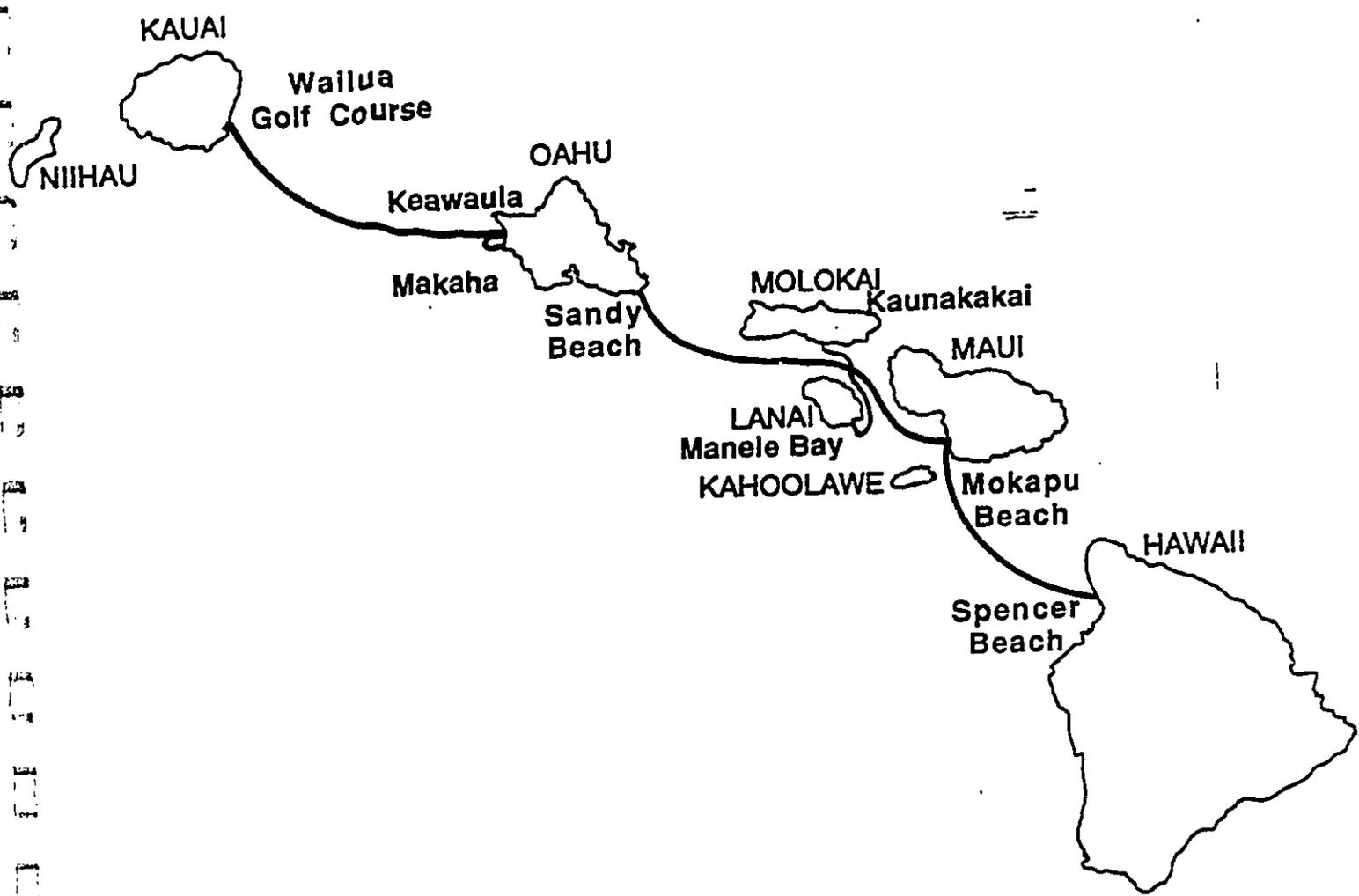


Figure 1-1
HAWAIIAN ISLAND FIBER NETWORK

GST Pacwest Telecom Hawaii, Inc.
 HI FiberNet

R. M. TOWILL CORPORATION

JANUARY 96



cable system. Construction of fiber optic cable landing facilities at the shore-end, therefore, will involve one of two alternatives, neither of which would result in adverse potential for impacts.

The first alternative will involve excavation from the shoreline to new handholes and ductlines which would be constructed to accept the cable. This would occur if insufficient capacity is available or due to technical circumstances involving shared use of the GTE Hawaiian Tel manholes and ductlines.

The second alternative would involve use of existing GTE Hawaiian Tel manholes and ductlines. This would occur if sufficient capacity were available for shared use. Construction to establish a connection from the GST fiber optic cable to the GTE facility will entail excavation from the shoreline to the existing manhole. From the manhole the fiber optic cable would be routed largely underground along an existing utility right-of-way.

Under both alternatives the cable alignment would utilize an existing cable easement from the 3-mile limit of State waters to the certified shoreline (the Manele Bay, Lanai, and Kaunakakai, Molokai, alignment would require new cable easements). Once the cable lands, it will utilize easements authorized by various appropriate landowners. Use of either alternative is not anticipated to result in adverse impacts to the environment. This was evident during the statewide GTE Hawaiian Tel fiber optic cable landings.

The purposes of the proposed project are as follows:

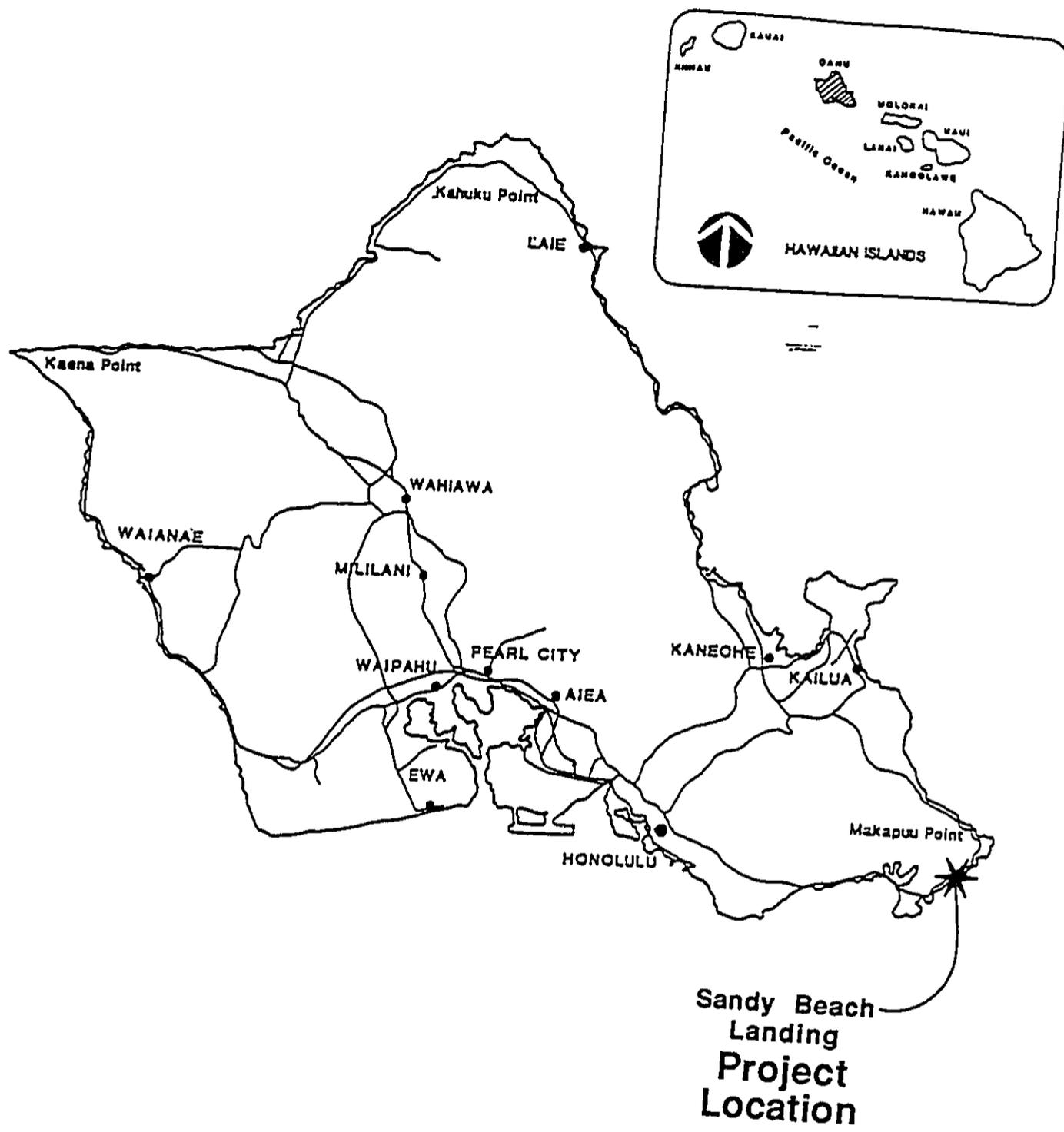
- To provide the public with a viable alternative to interisland telecommunication service that is now provided only by a single vendor. It is anticipated that additional competition will result in higher quality and competitive pricing which will benefit the public;

- Fiber optics will allow GST Pacwest Telecom Hawaii, Inc. to replace and enhance service now provided through microwave towers which have limited bandwidth capacity to serve customers. A fiber optic linkage has higher capacity bandwidth which would allow use of high technology services such as telemedicine and real time videotrafficing; and
- To provide redundancy to the existing interisland fiber optic system in the event of system failure or damage to the system.

1.2 PROJECT LOCATION

The proposed Oahu landing site for the Oahu to Maui segment of the submarine interisland fiber optic cable system is the easternmost point of Sandy Beach Park. Sandy Beach Park is located along the east coast of the Island of Oahu (Figure 1-2). The eastern most portion of the Beach Park lies along a rocky shoreline punctuated by short, sandy stretches of beachfront. The proposed landing site is currently undeveloped with little vegetation. To the west is the more heavily used and popular sandy beach section which is approximately 1200 feet long, with a wide and sloping foreshore. Existing features of Sandy Beach Park include two comfort stations, numerous patches of naupaka plants lying between the beach and Kalaniana'ole Highway, the Sandy Beach Park Access Road, and parking adjacent to each of the comfort stations.

If GST is required to construct handholes and ductlines, or if GTE Hawaiian Tel is able to provide the necessary assistance and authorization for use of its manhole and ductlines only, the proposed alignment will follow the route in Figure 1-3. The proposed cable will be routed subsurface from the landing site to Kalaniana'ole Highway. From Kalaniana'ole Highway the cable will be routed west on the mauka side of the highway right-of-way, to the Hawaii Kai Wastewater Treatment Facility. The cable will continue subsurface along the western edge of the treatment plant and will terminate at a terminal building (which will need to be constructed) located in the northwestern corner of the plant.



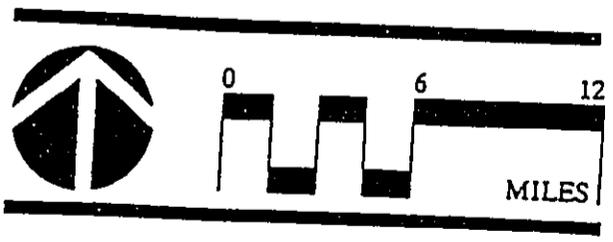
Sandy Beach
Landing
Project
Location

Figure 1-2
LOCATION MAP
Sandy Beach Park, Oahu

GST Pacwest Telecom Hawaii, Inc.
HI FiberNet

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April 1996



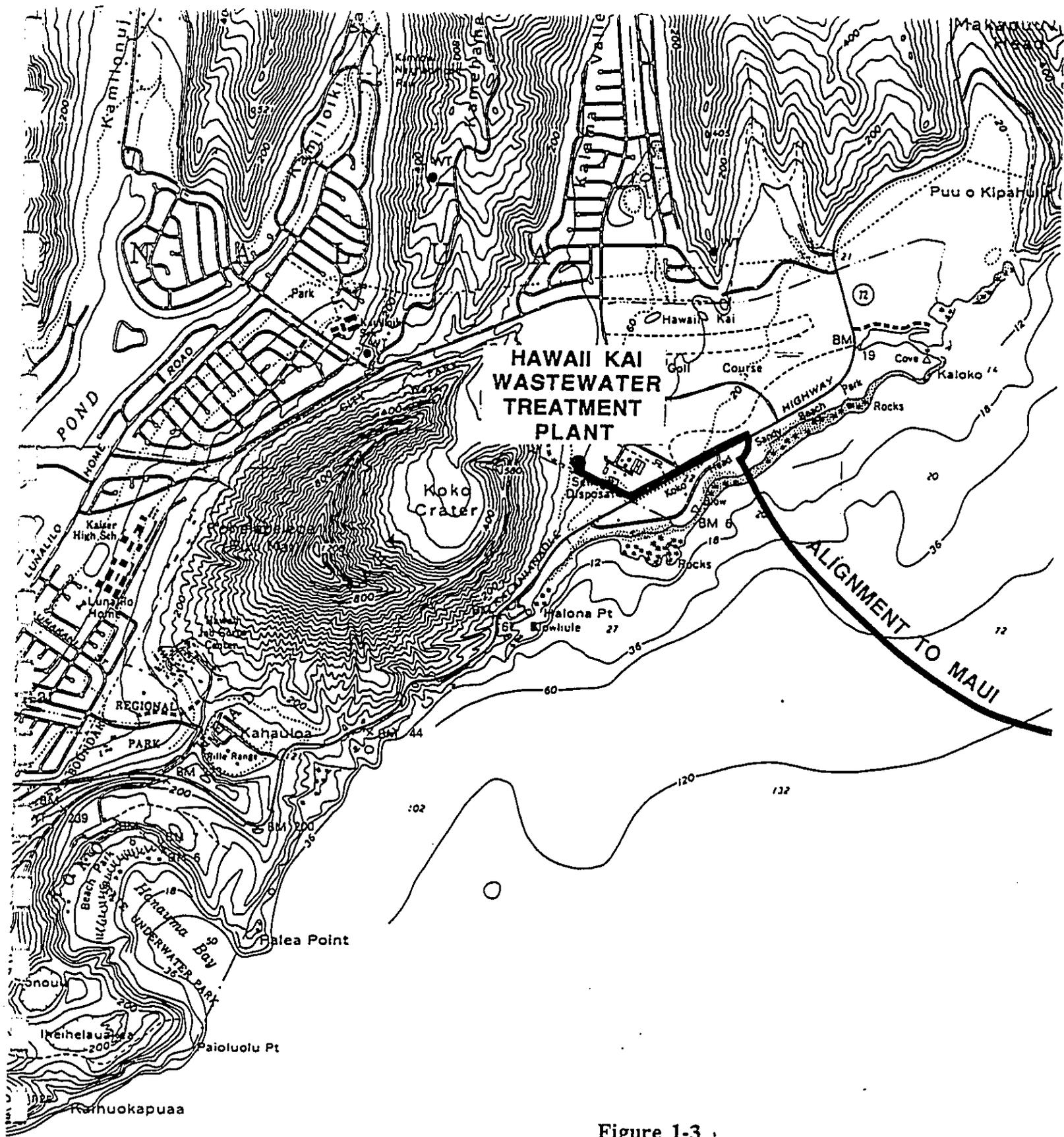
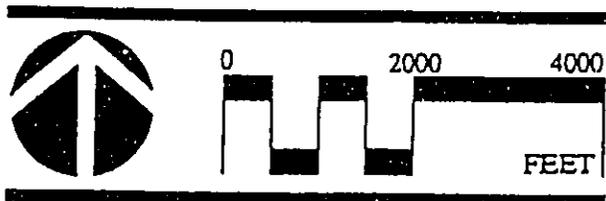


Figure 1-3
CABLE ALIGNMENT PLAN
 Sandy Beach Park, Oahu

GST Pacwest Telecom Hawaii, Inc.
 HI FiberNet

R. M. TOWILL CORPORATION

April 1996



If GTE Hawaiian Tel is able to provide the necessary assistance and authorization for joint use of facilities, the proposed route from the beach landing site will follow the Sandy Beach Park Access Road on the makai side, leading up to Kalaniana'ole Highway. At the vicinity of the highway and the Beach Park Access Road, the cable will be routed into an existing underground duct line which will lead to the GTE Hawaiian Tel Central Office (CO) located at 7664 Hawaii Kai Drive. Figure 1-4 illustrates this proposed alternative for the GST alignment at Sandy Beach.

SECTION 2
PROJECT BACKGROUND

2.1 CABLE TECHNOLOGY

The following is a discussion of existing telecommunication cable technology and how the determination was made to use fiber optics.

2.1.1 Copper and Fiber Optic Cables

The alternative to fiber optic cable is the use of copper wire cable. Copper wire cables function using a large number of plastic-coated copper wires housed within a plastic or synthetic outer casing. If necessary, steel or other protective materials are added to ensure strength and resistance to abrasion and breakage. In order to receive a voice transmission an electrical signal must be sent through a pair of copper wires to a receiver, where the electrical signal is converted back into sound. A typical cable, approximately 4 inches in diameter (without the outer protective casing), would house 600 copper wires with the capacity of approximately 3,600 voice circuits.

Copper wire cables require use of a repeater to boost electrical signals over long distances to ensure adequate signal strength at the receiving station. Repeaters are necessary every $\pm 6,000$ feet and require a high voltage power source to operate. Repeater dimensions for a 1,200 voice circuit will be approximately 1 to 2 feet in diameter by 3 feet long.

In contrast, fiber optic technology relies on the use of optical fibers and the transmission of light pulses which are converted into voice or data signals by the telephone company receiving station. The proposed fiber optic cable would contain approximately 24 fiber optic strands and would be housed in a plastic and steel casing no more than approximately 17 to 51mm in diameter (Figure 2-1). Like the copper cable, steel or other protective materials would be added as needed for strength. Each pair of fiber optic strands would be capable of handling approximately 8,000

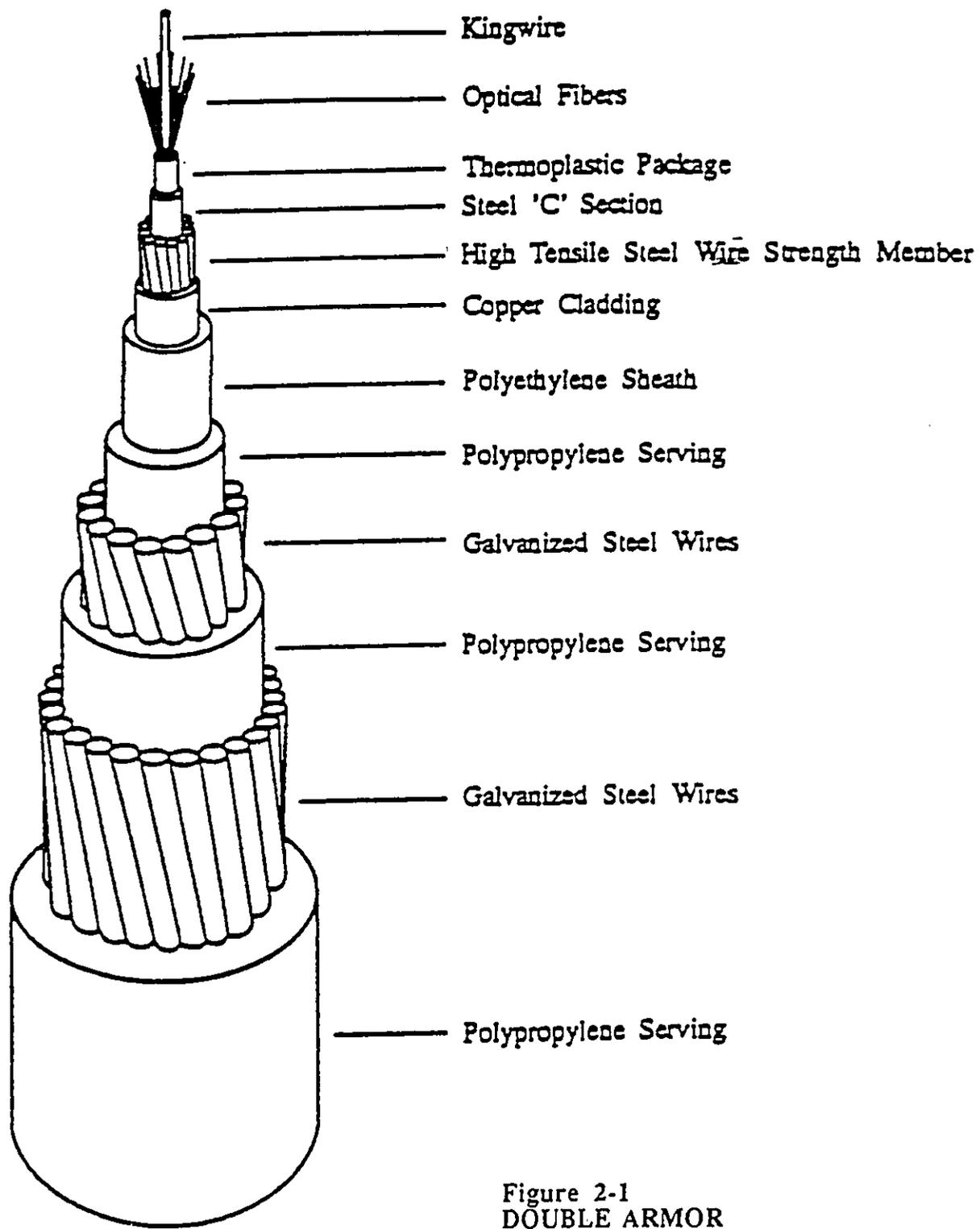


Figure 2-1
 DOUBLE ARMOR
 FIBER OPTIC CABLE

GST Pacwest Telecom Hawaii, Inc.
 HI FiberNet

R. M. TOWILL CORPORATION

April 1996

voice circuits, for a combined total on the order of 88,000 voice circuits (2 strands = 1 pair, 24 strands = 11 pairs working plus 1 pair spare, and 11 pairs x 8,000 voice circuits = 88,000 voice circuits). In addition, in order for a copper cable to achieve the capacity of a fiber optic cable, it would have to approach a diameter of approximately 10 to 20 feet, would require repeaters, and a high-voltage power line in addition to the copper cable.

A summary of reasons for selection of fiber optic technology includes:

- Fiber optic cables provide superior capacity and do not require high-voltage repeaters;
- The smaller diameter fiber cable ensures there will be minimal disturbance necessary to site the cable. There is less land needing to be graded, cleared and stockpiled in order to site a 17 to 51mm diameter cable.
- Sensitive areas that might otherwise be disturbed because of larger equipment, increased mobilization, and noise problems would be greatly reduced; and
- Length of time on site would be greatly minimized. Sensitive public or open space areas would not require a lengthy stay by the construction contractor and therefore would minimize potential hardships on beach users including swimmers, fishermen, surfers and other users.

2.2 SUBMARINE CABLE ROUTE

Most of the proposed alignment follows the previous route used by GTE Hawaiian Tel. The submarine cable route selection process involved identification of areas warranting study, based on a set of minimum evaluation criteria. The criteria included consideration of rapid erosion, giant landslides, drowned coral reefs, seismic activity, dumping areas, ship and airplane wrecks, other cables, and the length of routes.

In August 1991 a study was conducted by Seafloor Surveys International (SSI) to preliminarily identify an ocean route for the GTE Hawaiian Tel Submarine Fiber Optic Cable System. The route selected was one that minimized potential hazards to the installation, and eased maintenance and operation of the cable over a projected 25 year lifetime.

The following provides a detailed description of each of these criteria:

2.2.1. Rapid Erosion

The greatest danger to the cable system is in the submarine portion of the route as it is related to the geologically young age of the "Hawaiian Islands and the resulting extremely high erosion rates. Rapid erosion places large volumes of unconsolidated sediment into the shallow waters surrounding the islands. These sediment deposits move rapidly down the steep island slopes when they become unstable. This down-slope sediment movement can be initiated by earthquakes, storm runoff, and storm waves. Installation of cables on steep, sediment-covered submarine slopes should be avoided if possible. Where these slopes cannot be avoided, the cable should traverse as directly up the slope as possible (SSI, August 1991)."

2.2.2 Giant Landslides

Over the past several years, mapping of the Hawaiian Exclusive Economic Zone by the U.S. Geological Survey through the use of the long range Gloria sonar system, a relatively low-resolution, reconnaissance sonar, has discovered a series of large landslides surrounding the Hawaiian Islands (Moore, et.al., 1989). "The primary danger presently posed to the cable by these inactive landslides is their extremely rough surface. The seafloor in the slide areas is known to be littered with huge volcanic boulders. These boulders have been observed from submersibles to often be the size of a house. These slide surfaces pose a serious threat by producing unacceptable cable spans where the cable is draped over individual blocks, as well as the possibility of having the cable getting tangled if it had to be retrieved for repair (SSI, August 1991)."

2.2.3 Drowned Coral Reefs

A series of drowned coral reefs surrounding the islands are considered dangerous to the fiber optic cable system. "Locally steep slopes associated with these reefs could cause unacceptable cable spans in areas where strong bottom currents can be expected (SSI, August 1991)."

2.2.4 Seismic Activity

"The greatest danger to the cable from earthquakes is not the actual fault displacement itself, but the possibility they will initiate movement of unstable sediment deposits on the slopes of the islands. Epicentral locations of earthquakes with magnitude 3 or larger in the Hawaiian region should be avoided by the fiber optic cable (SSI, August 1991)."

"Seismic activity in the Hawaiian Islands is concentrated in the vicinity of the active volcanoes on the Island of Hawaii, where it is primarily related to the on-going volcanic activity. There are also earthquakes related to the tectonic subsidence of the islands due to the load that the growing volcanoes is putting on the earth's crust. These tectonic earthquakes are also concentrated in the area surrounding the island of Hawaii, where the greatest subsidence is taking place (SSI, August 1991)."

2.2.5 Dumping Areas

"A large, presently inactive, explosive dump is located west of Oahu. This dump will have to be avoided by the fiber optic cable. Navy authorities maintain this area has not been used for ordinance disposal since shortly after World War II. However, they advise against laying cables through the area (SSI, August 1991)."

"Dredge Spoils disposal sites authorized by the U.S. Army Corp of Engineers are also located close to all major island harbors and should be avoided by the cable route (SSI, August 1991)."

2.2.6 Ship and Airplane Wrecks

A complete, high resolution side-scan survey of the proposed cable route should be carried out to determine that the route is free of man-made hazards such as ship wrecks and lost airplanes.

There have been numerous ships and airplanes lost at sea in the Hawaiian area which have never been located.

2.2.7 Other Cables

There are several other cables in the planning stage including the Hawaii deep water electric transmission cable (from Hawaii to Oahu via Maui), and the Tri-Island power cables (linking Maui, Molokai and Lanai). Aside from these commercial cables, the University of Hawaii plans to install a fiber optic cable for neutrino research offshore from Keahole Point north of Kailua, Kona. In addition, other recently laid cables are now providing service to Hawaii and include GTE Hawaiian Tel Interisland Fiber Optic Cable System; Pac Rim East (Hawaii to New Zealand); and HAW-5 (California to Hawaii).

Along parts of this route the cable will have to be laid in close proximity to other existing communications cables. In these areas, the recommendations of the International Cable Protection Committee (ICPC) should be used as a guideline. At their 1985 Plenary Meeting in Sydney, Australia, ICPC recommended that no previously existing cable be crossed at less than a 45 degree angle, the closer the crossing can be to a right angle the better, and where possible a spacing of five miles should be maintained.

The proposed HI FiberNet cable in some nearshore segments will be laid roughly parallel to the existing GTE Hawaiian Tel cable. Wherever possible the ICPC guidelines for separation will be followed for all other crossings in deep ocean water.

Prior to making final decisions on cable placement, ICPC also recommends that American Telephone and Telegraph (AT&T) be contacted to determine if there are conflicts with other private, military, or other government cables.

2.2.8 Length of Routes Less Than 200 Kilometers

All routes are designed to be less than 200 kilometers in length in order to be serviced by repeaterless cables. There will be no submerged repeaters, however, signals will be phonetically amplified at each landside station. The fiber optic cable will operate on a single light transmission source generated from a Central Office and transmitted to a receiving Central Office. Since repeaters will not be required, no electrical power will need to be routed through the cable.

2.3 LANDING SITES SELECTION

In August of 1991 a study was conducted to select landing sites for the GTE Hawaiian Tel Fiber Optic Cable System connecting the islands of Kauai, Oahu, Maui, and Hawaii. A set of criteria was used to reduce the field of potential landing sites. The advantages and disadvantages of each site were evaluated to provide a basis for comparison.

The following is a brief discussion of criteria for determining landing sites:

2.3.1 Shoreline/Nearshore Conditions

The shoreline and nearshore conditions are a consideration because the depth of the water from the landing site towards the ocean must be deep enough to protect the cable. Approximately 50 to 60 feet of water will be required before wave forces diminish to levels where wave action does not affect the cable. Areas with extensive shallow water far from shore (i.e. 4,000'+) were considered difficult or suboptimal in providing protection during storms and other high wave conditions.

The composition of bottom conditions limits acceptable landing sites. Sandy bottoms are preferred in order to minimize any possible environmental impacts of anchoring, armoring, or trenching through rock or coral in order to securely fasten the fiber optic cable. Also if the ocean bottom has extensive sand deposits, especially adjacent to the shoreline, the cable can eventually be covered by sand, providing maximum protection against wave forces.

2.3.2 Public Use Considerations

It is anticipated that impacts to public recreational areas will be minimal given the short-term and relatively minor requirements for installing a fiber optic cable. However, because of potential for difficulties with area users, landing sites in areas of major public use are considered a constraint to selection.

Areas of potential historical and archaeological significance in close proximity to cable landing sites are also considered a constraint to selection, due to the possibility of destroying a historic site.

2.3.3 Environmental/Natural Resource Considerations

The landing sites should not be within proximity to rare or endangered species or their habitats. Impacts to shoreline and ocean water quality should also be kept to a minimum. Sites which would require extensive ocean anchoring and cable protection work (i.e., shielding/dredging) and/or on-shore excavation in ground conditions which promote soil erosion should be avoided.

2.3.4 Alternative Landing Sites

Three possible Oahu landing sites were identified for the Oahu to Maui segment of the fiber optic cable where underwater geology would be most suitable: Sandy Beach Park, Waimanalo Beach, and Kailua Beach Park. Sandy Beach Park was selected as the preferred landing site because the site exhibits positive characteristics including a nearshore alignment that can avoid most of the reefs and coral heads which lie alongside and within a small sandy channel leading away from the shoreline to the ocean. Another positive site feature of Sandy Beach Park is the low likelihood for discovery of archaeological/historic sites (Discussion with DLNR, Historic Sites Office). Should Sandy Beach Park be removed from consideration, Waimanalo Beach would be the alternate landing site. Waimanalo Beach possesses poorer shoreline and nearshore access given extremely shallow offshore reefs which would have to be crossed by the cable. Waimanalo Beach also has potential for discovery of archaeological remains according to the Department of Land and Natural Resources Historic Sites Office.

Kailua Bay is not considered a viable alternative because of the distance from the 60 foot contour to the shoreline, and the absence of a suitable channel. The distance to the 60 foot contour varies from 9,000 to 10,000 feet throughout this area. There is one large offshore sand channel, but it is very irregular with steep ledges on its borders. A cable into Kailua Bay would cross predominately hard bottom and, in most areas, an irregular shallow reef just offshore.

SECTION 3
CONSTRUCTION ACTIVITY

3.1 GENERAL

GST Pacwest Telecom Hawaii, Inc., is requesting shared use of existing GTE Hawaiian Tel manholes and ductlines to land and connect the terrestrial portion of its interisland fiber optic cable system. Construction of fiber optic cable landing facilities at the shore-end, therefore, will involve one of two alternatives, neither of which would result in adverse potential for impacts.

Alternative A will involve excavation from the shoreline at Sandy Beach Park to new handholes and ductlines which would be constructed to accept the cable. This would occur if insufficient capacity is available or due to technical circumstances involving shared use of the GTE Hawaiian Tel manholes and ductlines.

Alternative B would involve use of existing GTE Hawaiian Tel manholes and ductlines. Construction to establish a connection from the GST fiber optic cable to the GTE facility will entail excavation from the shoreline to the existing manhole. From the manhole the fiber optic cable would be routed largely underground along an existing utility right-of-way.

Project Phasing

The proposed project will be constructed in two phases. The first phase involves landside construction activities including trenching of the beach and nearshore area, and placement of temporary landing targets. This phase will be described in 3.2 LAND-SIDE ACTIVITY.

The second phase will involve the actual landing of the cable, installation of the cable into an existing or new manhole/handhole, and beach restoration. Phase two will be described in 3.3 NEARSHORE ACTIVITIES.

3.4 CABLE LANDING PROCESS provides a detailed description of the cable landing, and 3.5 SAFETY CONSIDERATIONS identifies precautions that will be exercised to ensure safety of the public.

Both alternatives will be discussed separately in each phase.

3.2 LAND-SIDE ACTIVITY

Alternative A - Construction of new handholes and ductlines:

The first phase involves land-side construction which includes installation of new handholes and approximately 2300-2400 feet of underground ducts and cable along Kalaniana'ole Highway to a new terminal building (to be constructed) at the Hawaii Kai Wastewater Treatment Plant.

The new 4' x 6' deep reinforced concrete handhole (smaller version of a manhole) will be constructed approximately 300-350 feet makai of Kalaniana'ole Highway adjacent to the Sandy Beach Park Access Road adjacent to the survey coordinates conducted for the previous cable landing by GTE Hawaiian Tel (Figure 3-1). The other two handholes will be installed, 1) on the mauka side of Kalaniana'ole Highway approximately 250-300 feet from the beach landing site; and 2) on the mauka side of Kalaniana'ole Highway approximately 600 feet east of the terminus point at the Wastewater Treatment Plant. Traffic on the Sandy Beach Park Access Road will not be affected except during the cable landing operations when the cable is pulled ashore from the cable laying ship (e.g. via a winch that will be placed on the mauka side of the Park Access Road). This work will be accomplished in one or two days during which the eastern end of the Park Access Road will be closed to traffic.

The terminus of the land-side activities will be an 8' X 24' terminal building at the Hawaii Kai Wastewater Treatment Plant, which will need to be constructed to accept the submarine fiber optic cable. The process of direct boring or trenching will be used to locate the fiber optic cable under the Sandy Beach Park Access Road, and along Kalaniana'ole Highway to the terminus at the Hawaii Kai Wastewater Treatment Plant. Traffic on Kalaniana'ole Highway and Sandy Beach Park Access Road will be maintained at all times through use of appropriate traffic control measures.

NOTICE: Under Alternative A, below, it may be possible that existing GTE Hawaiian Tel manholes may be utilized, with the remainder of the alignment to follow along Kalaniana'ole Highway to the Hawaii Kai Wastewater Treatment Plant. Under this scenario the description of proposed work would involve the following:

- Trenching will be limited to exposing the end of the existing GTE Hawaiian Tel ductlines/manhole as described in Alternative B.
- All other landside work to terminate at the wastewater treatment plant will be as described

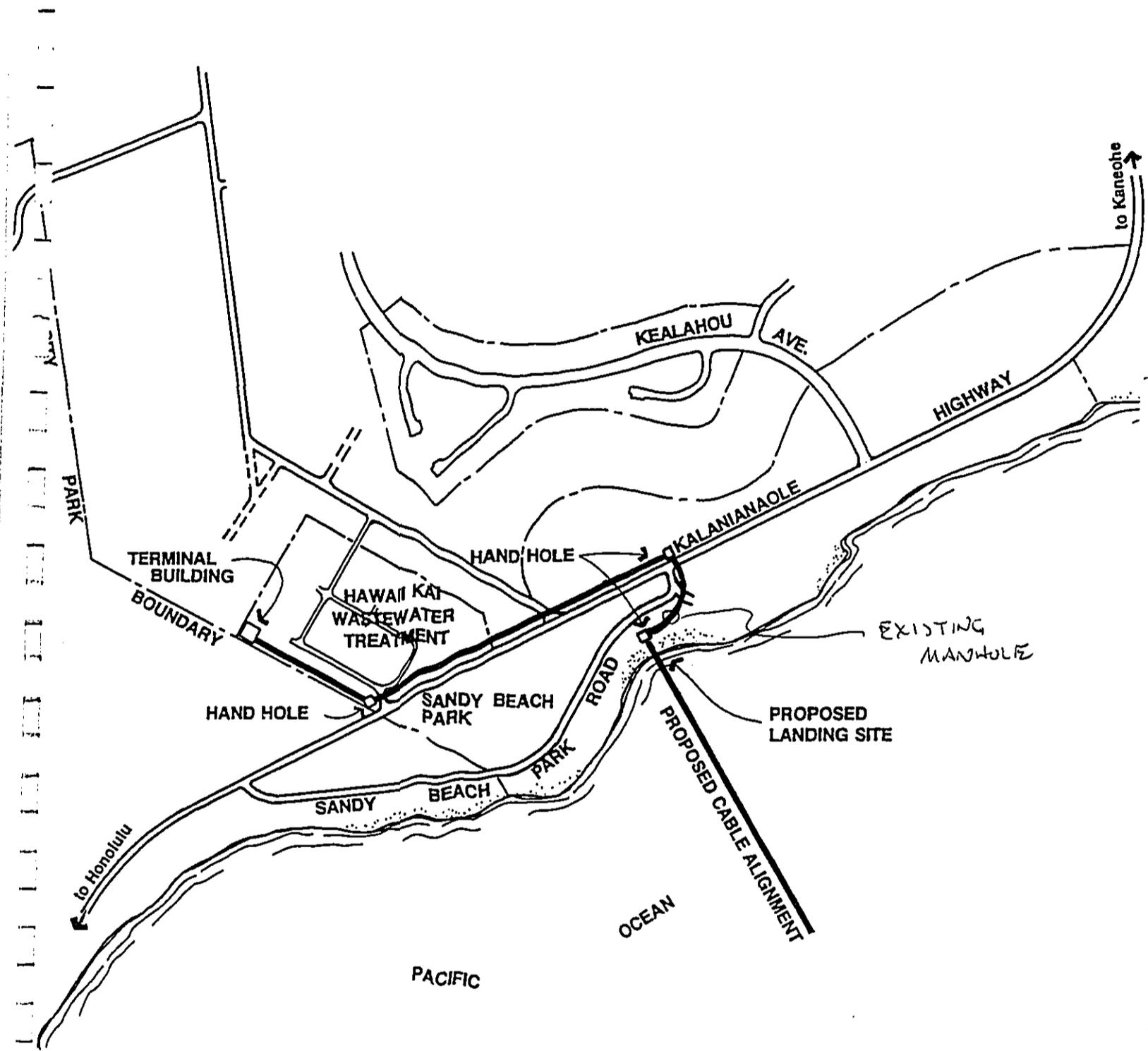


Figure 3-1
 SITE PLAN
 ALTERNATIVE (A)
 Sandy Beach Park, Oahu



Not to Scale

GST Pacwest Telecom Hawaii, Inc.
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April 1996

Alternative B - GST will utilize existing GTE Hawaiian Tel facilities:

The land-end construction activities will involve excavation of sand to expose the trench which contains the existing ductlines (Figure 3-2). This work will be done just prior to the landing of the cable. The cable will land at survey coordinates within the existing easement utilized by GTE for the previous cable landing at this site. The existing ductlines are buried in the sand at a depth of 3 to 7 feet. The upper layer of sand will be removed by machinery (either clamshell or backhoe). Layers of the sand that are closer to the existing ductlines will be removed manually.

Approximately 178 (6' x 248' x 9') cubic yards of sand and rubble excavated from the trench will be stored on the beach adjacent to the cable easement for later use as backfill.

From the landing site the cable will be pulled through approximately 9,700 feet of existing underground ducts to connect to the GTE Hawaiian Tel Central Office (CO) at 7664 Hawaii Kai Drive.

During the period of actual construction (excavation of the trench), that portion of the beach will be closed to beach users (approximately 5 days).

Two range targets (alignment markers) will be placed on land just prior to the landing of the cable to aid in the cable laying process. The first range target will be placed on the western (makai) edge of the Sandy Beach Park Access Road with the second movable target located approximately 164 feet east of the front range target. The range targets will be placed on temporary structures and will be removed following the cable landing. The range targets will affect traffic movements along the Sandy Beach Park Access Road and two way traffic along Kalaniana'ole Highway will be maintained at all times.

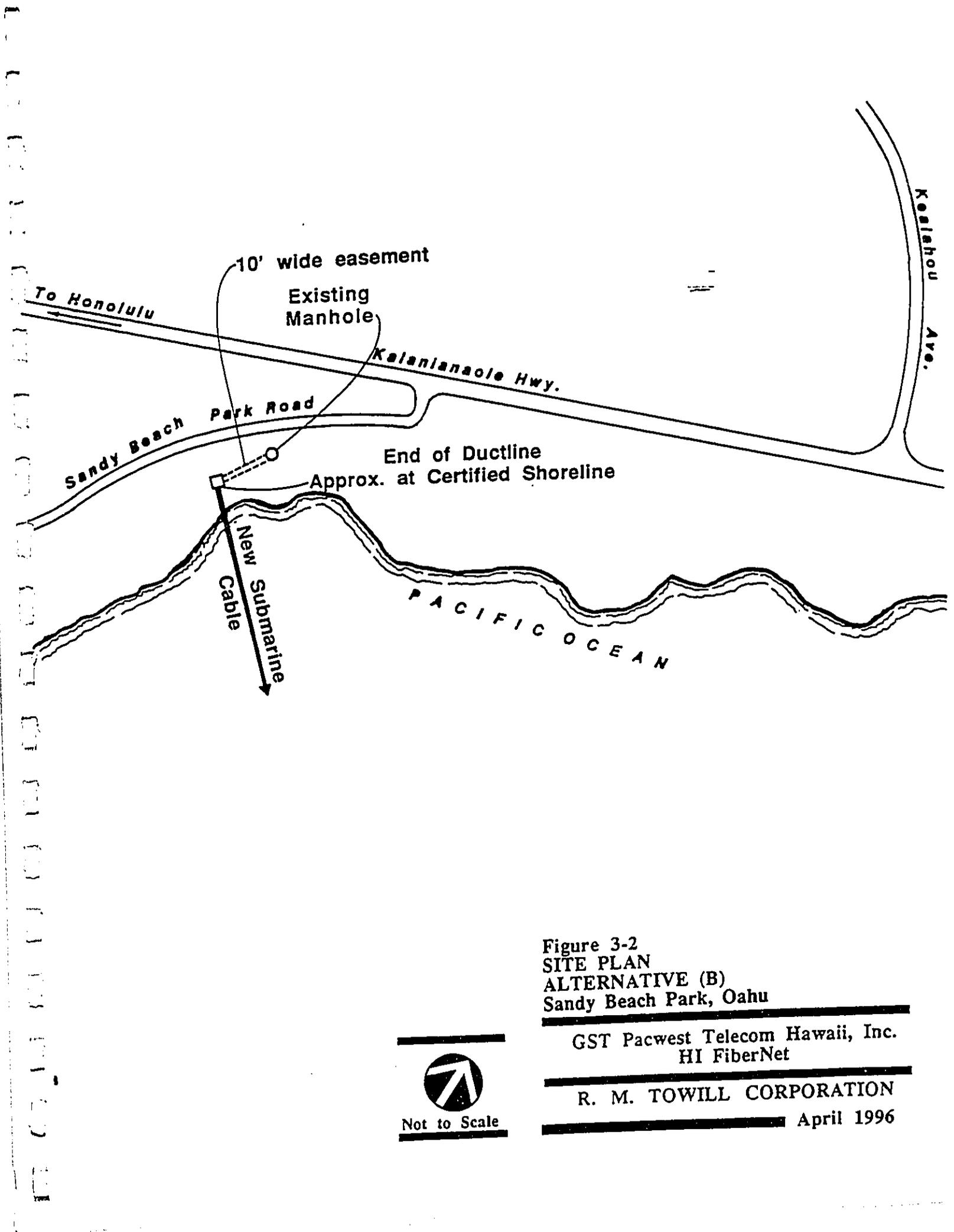


Figure 3-2
 SITE PLAN
 ALTERNATIVE (B)
 Sandy Beach Park, Oahu

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Not to Scale

3.3 NEARSHORE ACTIVITIES**

The greatest danger to a cable system is the submarine (underwater) portion of the route, and this necessitates more construction effort than the land-side activity. Protection of the cable and public safety are the major factors for ensuring the fiber optic cable is covered or anchored in nearshore waters. Approximately 50 to 60 feet of water will be required before wave forces diminish to levels where wave action does not affect the cable. Until the cable reaches this depth it must be protected. Trenching is preferred, because it provides maximum protection against wave forces and is best for public safety. Public safety is at risk if the cable is left exposed along the nearshore, because someone could trip over it or hit their foot against it. Therefore, it is suggested that trenching or cable armoring be used to protect the cable and for public safety.

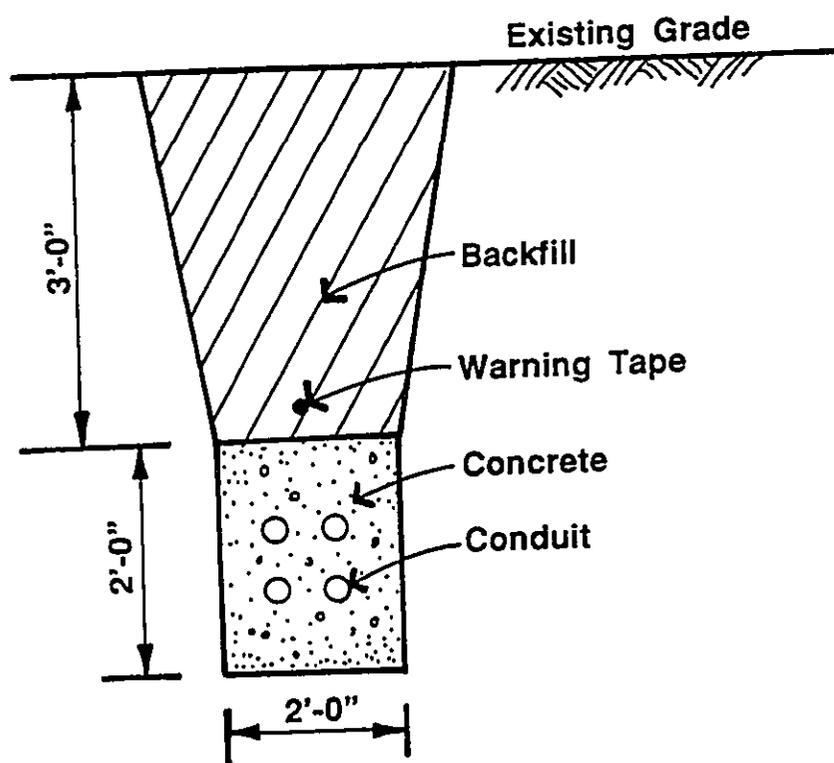
Alternative A - Construction of new handholes and ductlines:

The second phase of work involves landing the submarine fiber optic cable and establishing a connection with the new handhole at Sandy Beach Park.

A 200-foot long trapezoidal shaped trench will be excavated between the new handhole and the mean low water mark and four 4 -inch steel conduits encased in concrete installed within the trench (Figure 3-3). Only one conduit will be used while the others are plugged and retained for future use. The trench will have a 2-foot base and will be approximately 5-feet deep, with 1:1 side slopes. Approximately 260 cubic yards of sand and rubble excavated from the trench will be stored on the beach adjacent to the cable easement for later use as backfill. The trench will be backfilled after the concrete jacket has cured.

**NOTICE: Under Alternative A, below, it may be possible that existing GTE Hawaiian Tel manholes and ductlines may be utilized, with the remainder of the alignment to follow along Kalaniana'ole Highway to the Hawaii Kai Wastewater Treatment Plant. Under this scenario the description of proposed work would involve the following:

- Trenching will be limited to exposing the end of the existing GTE Hawaiian Tel ductlines/manhole as described in Alternative B.
- All other landside work to terminate at the wastewater treatment plant will be as described.



NEW HANDHOLE AT SANDY BEACH

Figure 3-3
 TRENCH SECTION
 ALTERNATIVE (A)
 Sandy Beach Park, Oahu

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April 1996

During construction, which is projected for 7 to 10 days, the open trench will be barricaded from the public and a security guard may be required at night and weekends to ensure public safety and integrity of the trench site.

Sand and rubble covering the proposed cable segment may require removal below the level of the prevailing tides. For this process, a backhoe, shovels, or other mechanical means will be used to remove the upper layers. Remaining sand or rubble will be removed using a hydro-jet. If necessary, sandbags will be used to prevent sand from reentering the open trench. Rock outcrops and other hard substrate which cannot be avoided will also be removed using a backhoe or other similar mechanical means.

To reduce potential for turbidity due to construction related work, silt screens will be utilized. Upon completion of construction activities, the construction crew will make every reasonable effort to return the ground to the existing preconstruction contours through use of existing excavated materials for backfill.

Two range targets (alignment guide) will be placed on land just prior to the landing of the cables to aid in the cable laying process. The range targets will be placed on temporary structures and will be removed following the cable landing. The range targets will not disrupt traffic movements along Kalaniana'ole Highway.

A cable laying ship provided by the cable vendor will serve as the primary means of laying the fiber optic cable. The following procedures describe the activities involved during the cable landing operations:

The cable ship will approach the landing site using the two range targets to align the ship as it approaches the shore. The range targets will be placed by a cable receiving party according to previously surveyed coordinates. Once the ship approaches the shore landing to the minimum depth allowable, it will fix its position relative to the landing site using anchoring, tugboats, side-thrusters, or other means. As the ship fixes its position, it will begin laying out cable.

The ship will lay cable while its personnel attach suspension floats at regular intervals to the cable. As the cable is lowered to the water, it will float, allowing it to be pulled toward shore using a winch, small motor boat, or other mechanical means.

The shore landing will be specially prepared to accept the cable. As the cable nears the shore, it will be fed into the steel conduit previously buried in the sand and pulled to the new handhole. When the cable is secured in the handhole, it will be temporarily anchored while the divers readjust the suspension floats in the water to obtain a proper nearshore to shoreline alignment.

A study of the ocean bottom along the proposed cable alignment at the landing site indicates the following features:

The first 600 feet out from the shore is hard substrate, consisting of relatively flat limestone with numerous small to medium (1 to 2-foot diameter) boulders. There are some scattered larger (3 to 4-foot diameter) boulders, particularly in the shallower water. The water depth at the seaward end of this zone is 20 feet. At the seaward limit of this inshore zone, there is a 100 to 150-foot wide band of ledges and other irregularities, with vertical relief on the order of 3 to 7 feet.

Seaward of the ledges, there is a 350-foot wide band of exposed limestone, with scattered coral heads and some sand. The water depth at the seaward end of this band, 950 feet from shore, is 32 feet. From this point to the 70-foot depth contour, located 2,500 feet offshore, the bottom is primarily sand. Because the sand deposit is irregular, the cable will cross two limestone spurs in this area, with a total width of approximately 250 feet. Again, the limestone is relatively flat, with scattered coral heads. Vertical relief is on the order of 1 to 2 feet.

Seaward of the 70-foot depth, the bottom consists of coral rubble, scattered sand, and some scattered limestone mounds and ledges. The coral rubble areas are flat, and the relief of the mounds and ledges is typically 3 feet.

The cable will be protected with cable armoring for the first 950 feet offshore, through the zone of hard substrate. Although the sand deposit appears to be relatively thin, it is extensive enough so that the cable will eventually be covered and protected against wave forces. Depending upon the selected cable vendor and the extent of cable armoring, protection may or may not be required where it crosses the two limestone spurs between the 32 and 70-foot depths. Protection will probably not be required beyond the 70-foot depth.

Depending on subsurface conditions, the cable may need to be curved around fixed underwater obstacles such as coral heads, finger coral, and rock outcrops. Coral, rock and other hard surfaces that cannot be avoided will have to be removed using various means such as:

1. Coral and limestone beds may need to be trenched to a width and depth of approximately 1 to 2 feet, or more, to accept the fiber optic cable. If necessary, tremie concrete can be poured into the trench where it can harden under water. The impacts can be minimized depending on the depth of trenching necessary to accommodate the relatively narrow diameter of the cable. If tremie concrete is used, it will provide a new surface for growth of coral and other marine organisms; or,
2. Shielded cable may be laid with split pipe fastened around the cable and then bolted to the hard rock or coral bed using pneumatic or mechanically driven bolts. This practice will result in minimal environmental impact since little or no coral will have to be displaced to site the cable.

The cable will be anchored in shallow water having a hard rock or coral bottom to prevent abrasion resulting from wave action. Under this situation without anchoring the cable would be exposed to abrasion from movement against hard surfaces caused by weather or geologically (tsunami) induced wave action. In deeper water, cable movement is significantly reduced and the need for wave related abrasion protection is less of a concern. According to Seafloor Surveys International, in deeper waters trenching is generally unnecessary since there are no man-made activities capable of dredging the cable off the ocean floor and damaging it (only commercial trawlers would pose this concern and none are located in Hawaiian waters in the vicinity of the proposed cable alignment).

Once the cable is aligned, the divers will cut the remaining floats away, allowing the rest of the cable to sink to the ocean bottom, and the cable will be permanently installed in the handhole.

Following this action, the cable ship will commence cable laying operations to the next landing site. The ship will follow a prescribed survey route until it reaches the other landing site where the end of the cable can be similarly connected.

Alternative B - GST will utilize existing GTE Hawaiian Tel facilities:

The second phase of work involves landing the submarine fiber optic cable and establishing a connection at the manhole previously installed at Sandy Beach Park. Operations will be short-term, will be based on the need for public safety and protection of the cable, and will not constitute a long-term impact.

There will be no permanent storage of any construction equipment on the beach. Equipment will only be on the beach during the beach construction phase, approximately 1-2 calendar days.

An approximately 100-foot long trench will be excavated between the existing ductlines and the mean low water mark. The trench will have a 2 foot-base and will be approximately 5 feet deep, with 1:1 side slopes. Approximately 130 cubic yards of sand and rubble excavated from the trench will be stored on the beach adjacent to the cable easement for later use as backfill. The trench will be backfilled after completion of work.

Sand and rubble covering the proposed cable segment may require removal below the level of the prevailing tides. For this process, a backhoe, shovels, or other mechanical means will be used to remove the upper layers. Remaining sand or rubble will be removed using a hydro-jet. If necessary, sandbags will be used to prevent sand from reentering the open trench. Rock outcrops and other hard substrate which cannot be avoided will be also removed using a backhoe or other similar mechanical means.

The shore landing will be specially prepared to accept the cable. As the cable nears the shore, it will be fed into the steel conduit previously buried in the sand and pulled to the existing manhole. When the cable is secured in the manhole, it will be temporarily anchored while the divers readjust the suspension floats in the water to obtain a proper nearshore to shoreline alignment.

The cable will be protected with cable armoring for the first 950 feet offshore, through the zone of hard substrate. Although the sand deposit appears to be relatively thin, it is extensive enough so that the cable will eventually be covered and protected against wave forces. Depending upon the selected cable vendor and the extent of cable armoring, protection may or may not be required where it crosses the two limestone spurs between the 32 and 70-foot depths. Protection will probably not be required beyond the 70-foot depth.

The cable will be anchored in shallow water having a hard rock or coral bottom to prevent abrasion resulting from wave action. Under this situation without anchoring the cable would be exposed to abrasion from movement against hard surfaces caused by weather or geologically (tsunami) induced wave action. In deeper water, cable movement is significantly reduced and the need for wave related abrasion protection is less of a concern. According to Seafloor Surveys International, in deeper waters trenching is generally unnecessary since there are no man-made activities capable of dredging the cable off the ocean floor and damaging it (only commercial trawlers would pose this concern and none are located in Hawaiian waters in the vicinity of the proposed cable alignment).

Once the cable is aligned, the divers will cut the remaining floats away, allowing the rest of the cable to sink to the ocean bottom, and the cable will be permanently installed in the existing manhole.

Following this action, the cable ship will commence cable laying operations to the next landing site. The ship will follow a prescribed survey route until it reaches the other landing site where the end of the cable can be similarly connected.

3.4 CABLE LANDING PROCESS

Alternative A - Construction of new handholes and ductlines:

The cable landing process includes the use of the land-side targets (alignment markers) to assist in the alignment of the cable as it is being installed. The cable laying ship may be assisted by two tugboats to maintain proper alignment of the cable ship. This assistance is essential to ensure that the cable is placed within the existing cable easement. Once the cable laying ship is properly aligned, the cable will be towed from the ship by one of the tugs to a transfer location nearshore. At this location, the leading end of the cable will be attached to a rope connected to land based pulling equipment (i.e., winch) and pulled ashore. Once the cable is placed within the new steel conduit, the leading end of the cable will be secured within the handhole and spliced together with cable emanating from the Hawaii Kai Treatment Plant.

Once the cable has been secured, the open trench will be backfilled and efforts taken to restore the beach as much as practicable to its original preconstruction condition.

Alternative B - GST will utilize existng GTE Hawaiian Tel facilities:

The cable landing process includes the use of the land-side targets (alignment markers) to assist in the alignment of the cable as it is being installed. The cable laying ship may be assisted by two tugboats to maintain proper alignment of the cable ship. This assistance is essential to ensure that the cable is placed within the existing cable easement. Once the cable laying ship is properly aligned, the cable will be towed from the ship by one off the tugs to a transfer location nearshore. At this location, the leading end of the cable will be attached to a rope connected to land based pulling equipment (i.e., winch) and pulled ashore. Once the cable is placed within the new steel conduit, the leading end of the cable will be secured within the manhole and spliced together with cable emanating from the nearby central office.

Once the cable has been secured, the open trench will be backfilled and efforts taken to restore the beach as much as practicable to its original preconstruction condition.

3.5 SAFETY CONSIDERATIONS

The following safety precautions will be exercised regardless of the alternative selected: During the construction phase on the beach (approximately 7 to 10 calendar days per site), the portion of the beach that contains the open trench will be barricaded from public entry. During the construction period, a security guard may be required at night and weekends to ensure public safety and integrity of the job site.

During the cable laying process (approximately 10-12 hours depending on the weather conditions), the nearshore waters will be closed to ocean activities (surfing, diving, boating, and swimming) to ensure public safety of the ocean users. The area that will be closed will be approximately 100 to 150 feet wide and 2,000 to 5,000 feet long. The actual area may be more or less depending on the tides. The period when the waters will be closed is not expected to be more than two days, weather permitting. This short-term "closure" of nearshore water areas will be achieved by publishing a notice to advise mariners to avoid the area. Further, during the cable laying process, project personnel will advise beach users to avoid the project site both on land and in the water via small powered water crafts.

3.6 SCHEDULE AND ESTIMATED COST

Alternative A - Construction of new handholes and ductlines:

The first phase (land-side activities) of the project is scheduled tentatively for Fall 1996 . The second phase (installation of the interisland cable and cable landing operation) is also scheduled tentatively for Fall 1996. Construction cost for the first phase is estimated at + \$250,000. .

Alternative B - Authorization for joint use of GTE Hawaiian Tel facilities:

The installation of interisland cable and cable landing operations is scheduled tentatively during the 4th quarter of 1996. Construction costs for this phase are estimated at +\$100,000.

SECTION 4
DESCRIPTION OF THE AFFECTED ENVIRONMENT

4.1 PHYSICAL ENVIRONMENT

4.1.1 Climate

The project site and surrounding area are located on the southeastern side of Oahu which is generally warm and dry. The mean annual temperature is between 72 and 75 degrees Fahrenheit and the annual rainfall is between 15 and 25 inches, most of it occurring during winter months (Atlas of Hawaii, 1983).

4.1.2 Topography, Geology, Soils

The project area lies at the base of two geologic formations, the Koolau Mountains and Koolau Volcano. The predominant soil type for the area excluding the landing site, as described in the August 1972 U. S. Department of Agriculture, Soil Conservation service publication, "Soil Survey of the Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii," consists of the Koko Series particularly Koko silt loam, 2 to 6 percent slopes (KsB). The surface layer is a dark reddish-brown silt loam about 16 inches thick. The subsoil, about 32 inches thick, is dark reddish-brown or dark-brown soil loam, or clay loam that has subangular blocky structure. Permeability is moderate, runoff is slow and the erosion hazard is slight.

Soils at the landing site consist of rock land. Rock land (rRk) is made up of areas where exposed rock covers 25 to 90 percent of the surface. The rock outcrops and very shallow soils are the main characteristics.

Impacts

With respect to the segment of the cable to be installed subsurface, no long term surface impacts are anticipated since the project involves temporary excavation and filling with the same material. The excavated portions will be returned, as much as practicable, to its original preconstruction condition.

4.1.3 Hydrology

There are no perennial streams in the subject area. The major drainage feature for the area is an unnamed gulch to the north which is dry except for the rainy season. Groundwater for the area is basal in sediments and is not a source for domestic use (Atlas of Hawaii, 1983).

Impacts

No adverse impacts are anticipated on surface water or groundwater since the project will not alter existing drainage patterns or have any water requirements.

4.1.4 Terrestrial Flora/Fauna

The area's flora is classified as lowland dry shrub and typically contain plant species such as kiawe, naupaka, klu, koa haole, gingergrass, and bristly foxtail. Homesites, pasture, and truck crops are the most common uses for this type of plant environment. No rare or endangered species of plants are known to inhabit the site. Existing flora and fauna of the project site consists mainly of introduced species.

With respect to animal wildlife for the area, no rare or endangered animals are known to inhabit the site. The area has a dry climate and sparse vegetation and does not provide good habitats for rare animals.

Impacts

Because the project area is not known to contain any rare plants or animals, adverse impacts are not anticipated. As part of the proposed development the exposed areas within the cable easement will be replanted to ensure stability of the site.

4.1.5 Marine Flora and Fauna

The proposed cable landing site along the nearshore zone at Sandy Beach is characterized by substrates of sand with various forms of bottom sediments ranging from coral reef and bedrock. Species normally found along the nearshore zone include various small fishes, sea urchins, crabs, algae, and other marine invertebrate. The intertidal zones of the proposed landing site is occasionally subjected to high wave energy which in part helps to explain the relatively low diversity of species.

Rare and threatened species which may be found along this area includes the protected green sea turtle and, during the winter months, humpback whales. There is no current evidence that nesting of green sea turtles has occurred at Sandy Beach. Oahu is the most heavily urbanized of the Hawaiian Islands and beaches at the proposed cable landings are often frequented by humans which would serve as a deterrent to selection of a suitable undisturbed nesting site.

Humpback whales, another protected species, are also rarely observed offshore of the cable landing sites. As noted in a previous survey of Sandy Beach, Oahu, "[Herman, 1979], humpback whales tend to be found in regions remote from human activities, thus relatively fewer numbers of whales are seen around Oahu as compared to other islands."

Impacts

It is anticipated that as the fiber optic cable is laid that most, if not all of the marine organisms present would simply move out of the way for the temporary duration of work. Upon completion it is expected that the cable would eventually bury itself in areas with loose sand and sediments.

Sea Engineering conducted a previous study (Sea Engineering, 1992) on the potential for impacts to marine organisms from the laying of the GTE Hawaiian Tel Interisland Fiber Optic Cable System (1993) for the Sandy Beach and Kahe Beach Park locations. According to Sea Engineering, "In the shallower areas along the route, there are areas where the cable will cross hard substratum and there is a greater possibility of impact to benthic and fish communities. Impacts associated with these construction activities primarily include removal of benthic communities in the cable path, and the generation of turbidity which may impact surrounding communities. The small scale of the proposed activities that would be necessary to protect the cable in shallow water would produce little sediment, and over a relatively short period of time (Sea Engineering, January 1992)."

"Another concern may be with disturbance to threatened or endangered species. Assuming that deployment of the cable occurs during the period of time that humpback whales are in island waters, it is anticipated that the impacts to whales would be minimal. The deployment of the cable from shallow water to shore should not take longer than one day. In general, this deployment is done by bringing the cable laying ship into about the 60 foot isobath; from this point to shore the cable is buoyed up using floats and small craft are used to maneuver the cable into the appropriate alignment and into shore."

"The probable source of local impact to whales would be the production of noise by the cable laying ship and smaller vessels used to bring it ashore. There are variable and conflicting reports as to the impact of vessel traffic on whales. Evidence from the

northwest Atlantic and northeast Pacific suggest behavioral changes by whales in response to vessels, but they may show considerable fidelity to specific areas despite vessel traffic (major shipping, trawler activity, etc.; Brodie 1981, Matkin and Matkin 1981, Hall 1982, Mayo 1982). In contrast Jurasz and Jurasz (1980) found a sharp decline in humpback whale numbers in Glacier Bay, Alaska with increases in vessel activity. In a short term study, Bauer (1986) found no correlation between vessel and whale numbers as well as no net movement offshore at Olowalu, Maui in 1983-84. However, a six year study suggested a major offshore movement of mother-calf pods off Maui with increased vessel traffic (Glockner-Ferrari and Ferrari 1985, 1987). This study alone cannot be used to determine whether the observed reductions in sighting around Maui is correlated with vessel traffic; there is no consistent baseline information or comparative studies on humpback whale habitat utilization around Maui which may corroborate the trends reported by Glockner-Ferrari and Ferrari (Tinney 1988)."

"With respect to the response of individual humpback whales, there is sufficient information to demonstrate that boating and other human activities do have an impact on behavior (Bauer and Herman 1986). Thus it is probably valid to assume that impact to whales could occur if individuals are within several kilometers of the cable deployment. However as noted above the impacts (here noise) are not expected to last for more than one day, and all activities will be concentrated in a very small area."

"Sea turtles are permanent residents in inshore Hawaiian habitats thus the potential exists for problems during the construction phase if it entails dredging. The generation of fine particulate material from dredging appears not to hinder the green turtle in Hawaiian waters; at West Beach, green turtles moved from an offshore diurnal resting site about one kilometer offshore to a point about 200m from the construction site within days of the commencement of dredging and the generation of turbid water. The turtles appeared to establish new resting areas in the turbid water directly offshore of the construction site (Brock 1990a). The reason(s) for this shift in resting areas is unknown but may be related to the turtles seeking water of poor clarity to possibly lower predation by sharks (a major predator on green sea turtles)."

"Any construction activity that generates fine particulate material will lower light levels and in the extreme, bury benthic communities. Sedimentation has been implicated as a

major environmental problem for coral reefs. Increases in turbidity may decrease light level resulting in a lowering of primary productivity. When light levels are sufficiently decreased, hermatypic corals (i.e., the majority of the corals found on coral reefs) will eject their symbiotic unicellular algae (zooxanthallae) on which they depend as source of nutrition. However, in nature corals will eject their zooxanthallae and survive (by later acquiring more zooxanthallae) if the stress is not a chronic (long-term) perturbation."

4.1.6 Scenic and Visual Resources

The area is generally void of man-made structures except for light poles along Kalaniana'ole Highway and the Park Access Road, and beach park amenities such as showers and toilet facilities.

Impacts

For seven to ten days there will be a temporary impact on coastal views due to construction activities. During construction, the beach portion of the project will have construction equipment and a mound of sand from the excavated trench.

No adverse impacts are anticipated on the beach park since the proposed cable will be located below surface and routed by existing ductlines under Kalaniana'ole Highway.

Once construction is completed, the beach will be returned as much as practicable to its existing condition. Excess material not utilized for fill will be removed in accordance with applicable regulations of the County and State of Hawaii.

4.1.7 Historic/Archaeological Resources

There are no known features of historic or archaeological significance in the vicinity of Sandy Beach Park (Atlas of Hawaii, 1983). Due to the site's popularity as a recreational destination, any visible remains would have been recovered or destroyed during the development of the park.

Impacts

As with all other landings, no short or long term impacts are expected from the development of the proposed project. However, should any unidentified cultural remains be uncovered during cable installation, work in the immediate area will cease and the appropriate government agencies will be contacted for further instructions.

4.1.8 Beach Erosion and Sand Transport

Sandy Beach is about 1,200 feet long and is fairly wide with a sloping foreshore. The bottom immediately offshore, a mixture of patches of sand, lava, and reef, drops off abruptly to an average depth of eight to ten feet. This quick change in depth creates the very steep and hard-breaking waves that pound in the shorebreak. On a big day the surf erodes the sand to form a steep foreshore, which in turn produces a strong, forceful backwash.

Sandy Beach, as described in July 1981 by Dennis Hwang, "Beach Changes on Oahu as Revealed by Aerial Photographs," has historically been an unstable beach system. Sandy Beach may have an annual variation in width of at least 25 feet. However the beach at the project area has remained relatively stable because it lies landward of a basalt lava shelf located at the water line. The lava shelf shelters the sandy areas from typical coastal processes that cause accretion and erosion.

Impacts

The proposed project is not expected to impact beach processes. Upon completion of construction activities, the construction crew will make every reasonable effort to return the ground to existing preconstruction contours through use of existing graded materials for backfill. The existing basal shelf which has kept the beach relatively stable will remain preserved.

4.1.9 Noise From Construction Activity

For the proposed Sandy Beach Park landing site, noise will be generated during the construction phase of the project. Cable laying and excavation equipment and machinery will be used, which will be sources of noise.

Impacts

Noise generated from machinery can be mitigated to some degree by requiring contractors to adhere to State and County noise regulations. This includes ensuring that machinery are properly muffled. Some work at night may be required. Night activities include cable splicing, cable pulling, operation of machinery, etc.

Boats (tugs and a small craft) that are used during the construction period will also be a source of noise. The impact of noise from these vessels cannot be mitigated. The noise

impact will be temporary in nature and will not continue beyond the construction and cable laying period.

4.1.10 Air Quality

Air quality in the proposed project area of Sandy Beach is good due to low emission levels and the almost continual presence of tradewinds or on-shore breezes. The major factor affecting air quality in this area is vehicular traffic.

Impacts

During the excavation process, loose sand and dirt may be cast into the air by wind. The release of sand into the air can be prevented by requiring the contractor to periodically wet down the work area. The areas that are used for the placement of the range targets will also be exposed during the construction period. The target sites should be similarly wetted to control fugitive dust. The work sites will be returned to their original state after the cable laying process is completed.

Operation of construction vehicles is expected to temporarily contribute carbon monoxide pollutants in the vicinity of the projects.

4.1.11 Water Quality

Open coastal waters at Sandy Beach are rated Class "A", by the State Department of Health. The shallow waters off this beach experience considerable turbidity even when surf is minimal. Offshore waters are very clear with excellent underwater visibility over reef slopes. Water temperature and salinity are normal for ocean water in this area, with evidence of fresh water inflow along the shore.

Impacts

It is anticipated that potential for increased turbidity may occur in nearshore waters of the project sites during the trench excavation and backfilling operations. Silt screens may be erected by the construction crew to lessen and minimize effects of turbidity. Water collected during the construction process will be discharged on the beach adjacent to the work area.

4.2 SOCIOECONOMIC ENVIRONMENT

4.2.1 Population

According to the 1990 Census, the resident population within the Hawaii Kai area numbered 28,636. The population of Honolulu County as of 1994 was 836,000 and is projected to increase to 999,500 by 2010 (The State of Hawaii Data Book, 1994).

Impacts

No adverse impacts on existing resident and worker populations in the project site areas is expected. The project will be beneficial to these communities by providing high bandwidth capacity to a number of communications carriers on an equal basis. This gives them the capability to provide additional communication services to their customers, which helps reduce prices to Hawaiian businesses and residents.

4.2.2 Surrounding Land Use

Sandy Beach Park and the surrounding coastal land to the west, which is owned by the City and County of Honolulu, is primarily in recreational use. Queens Beach which is located east of Sandy Beach Park is privately owned. Lands mauka of the coastal beach areas are generally vacant. The Hawaii Kai Golf Course is located mauka of Sandy Beach Park, across the Kalaniana'ole Highway. The Hawaii Kai Sewage Treatment Center is located 2,000 feet to the west.

Impacts

No short or long term impacts are expected from the development of the proposed project. The portion of the project which will be worked on will be subsurface only. The cable route will be on vacant land when subsurface and carried overhead within street right-of-ways and will not adversely impact surrounding uses.

4.3 PUBLIC FACILITIES AND SERVICES

4.3.1 Transportation Facilities

The project site is served by Sandy Beach Park Access Road. Depending on negotiations, construction may involve one of two possibilities: (1) within the road-right-of-way, construction will involve excavation of the pavement and subsurface within the 10-foot easement, placement of the conduits within the exposed trench, and restoring the roadway to its preexisting condition; or

(2) construction will involve preparing the site to land the fiber optic cable and installing the cable within an existing ductline.

Impacts

The proposed project is expected to have no impact on the existing traffic or bus services. Construction will take seven to ten days and will not adversely affect transportation use of the area.

4.3.2 Recreational Facilities

The principal recreational facility in the vicinity of the project site is Sandy Beach Park. The beach park is used for swimming, sunbathing, surfing, bodysurfing, diving, fishing, kiting, and picnicking. The western side of Sandy Beach Park has the widest area of sand beach, and is more heavily used than the eastern side (Figure 4-1).

Sandy Beach Park has become very popular among users since it was made accessible by automobile in October 1931. Visitor counts taken for The State of Hawaii Data Book (1990) revealed that approximately 2,815,288 people used the park facilities during that year. This public usage lies in between Waikiki's high usage of 11,173,540 and Kualoa low usage of 71,406.

Impacts

No long term impacts are expected from the development of the proposed project. However, development will temporarily impact land recreation uses on a small portion of the eastern part of Sandy Beach Park. During construction a limited portion of the of the park will have to be closed for safety reasons. However because the majority of recreational activities occur on the western part of Sandy Beach Park no adverse impacts are expected.

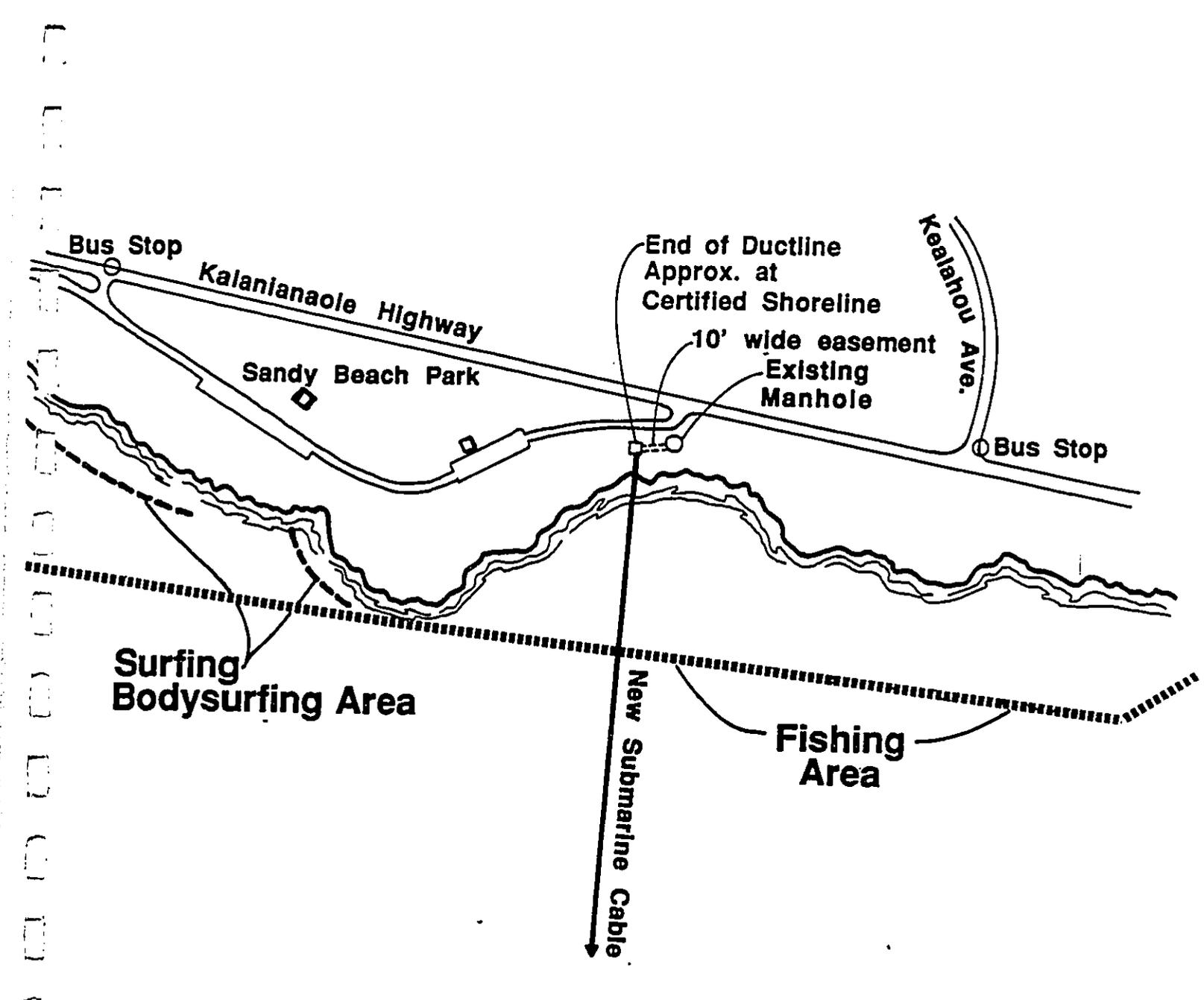


Figure 4-1
RECREATIONAL / PUBLIC USES
Sandy Beach Park, Oahu

GST Pacwest Telecom Hawaii, Inc.
HI FiberNet

R. M. TOWILL CORPORATION

JANUARY 96



SECTION 5

RELATIONSHIP TO STATE AND COUNTY LAND USE PLANS AND POLICIES

5.1 THE HAWAII STATE PLAN

The Hawaii State Plan (Chapter 226, Hawaii Revised Statutes) provides a guide for the future of Hawaii by setting forth a broad range of goals, objectives, and policies to serve as guidelines for growth and development of the State. The proposed project is generally consistent with the Hawaii State Plan. The following objectives of the State Plan are relevant to the proposed project:

Section 226-10.5: Economy - Information Industry

The proposed project serves to assist in the State's objective of positioning Hawaii as the leader in information services in the Pacific Rim. The proposed project will continue development and expansion of Hawaii's telecommunications infrastructure and will help to accommodate future growth in the information industry.

Section 226-14 Facility Systems - In General

The proposed project supports the State's goals for achieving telecommunications systems necessary for Statewide social, economic, and physical objectives.

Section 226-18: Facility System - Energy/Telecommunications

The proposed project will help to ensure adequate and dependable telecommunication services for Hawaii by promoting efficient management and use of existing and proposed facilities and by promoting installation of new telecommunications cables.

5.2 STATE FUNCTIONAL PLANS

The Hawaii State Functional Plan (Chapter 226) provides a management program that allows judicious use of the State's natural resources to improve current conditions and attend to various societal issues and trends. The proposed project is generally consistent with the State Functional Plans. The following objectives of the State Functional Plans are relevant to the proposed project:

Education Implementing Action A(4)(c):

The proposed project will help to ensure adequate telecommunication services necessary for Hawaii's schools objectives.

Education Implementing Action B(3)(d):

The proposed project serves to promote and expand the appropriate use of telecommunications to deliver distance education as well as enhance the learning process and communication competencies of students.

Education Implementing Action(3)(e):

The proposed project enables school library media centers to effectively manage and provide access to information and knowledge through telecommunications.

5.3 STATE LAND USE LAW

The State of Hawaii Land Use District classifications designate Sandy Beach Park as "Conservation" and the surrounding areas as "Urban" (Figure 5-1). Because the proposed activity involves installation of a utility line no land use district change will be required. Because the Sandy Beach landing will require work in the water, a Conservation District Use Permit (CDUP) will be applied for as part of this project. In addition, further coordination with the State Department of Transportation (DOT), Harbors Division, and the U.S. Coast Guard will be required to advise mariners of the proposed action.

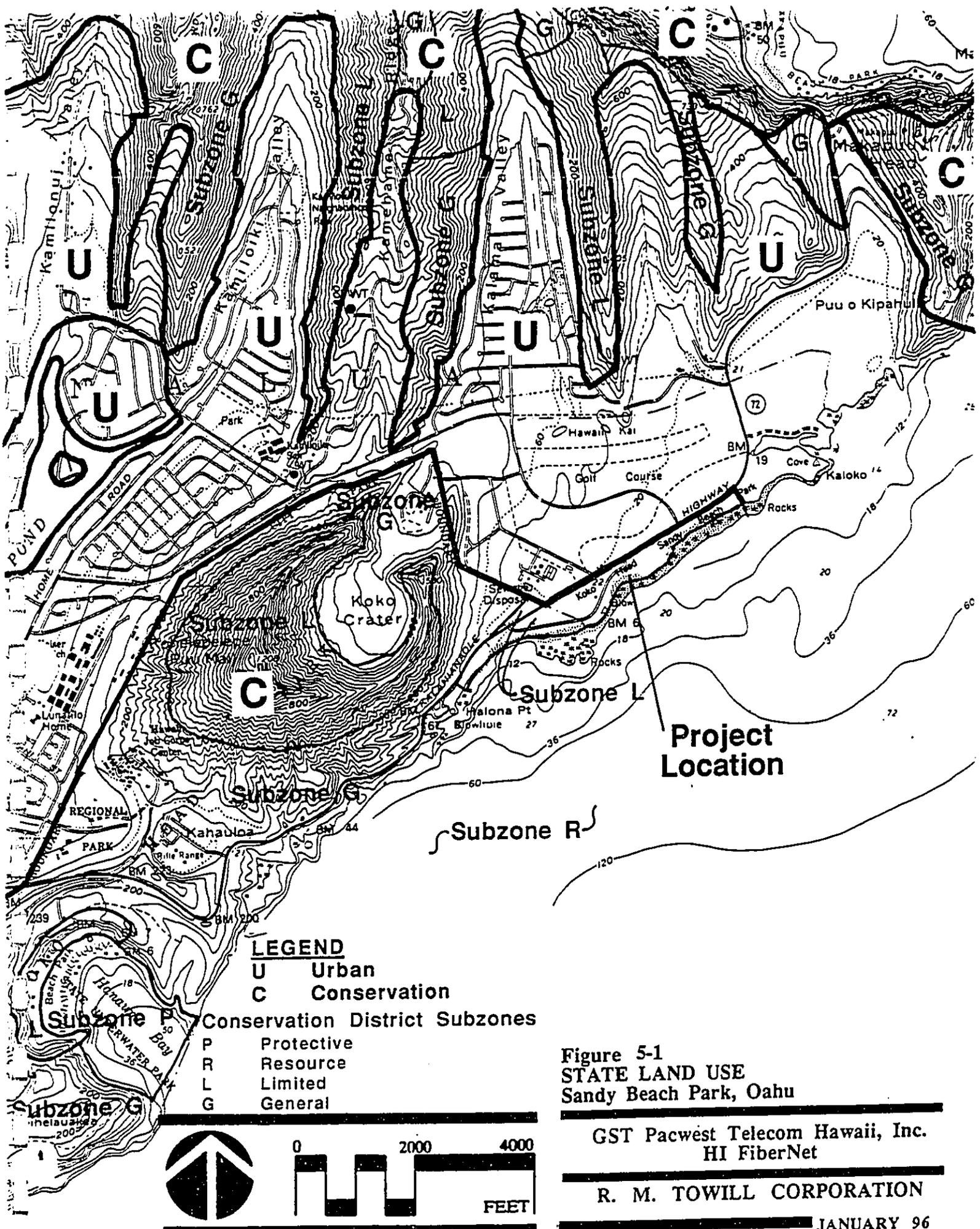
5.4 COUNTY ZONING

Zoning for Sandy Beach Park (TMK: 3-9-12:02) is restricted preservation (P-1) (Figure 5-2). the areas surrounding Sandy Beach are zoned general preservation (P-2) and residential (R-5) No zoning change will be required. For the P-1 zoning, the LUO cites the following:

"5.10 Preservation districts: Purpose and intent.

- (a) It is intended that all lands within a state-designated conservation district be zoned P-1 restricted preservation."

and,



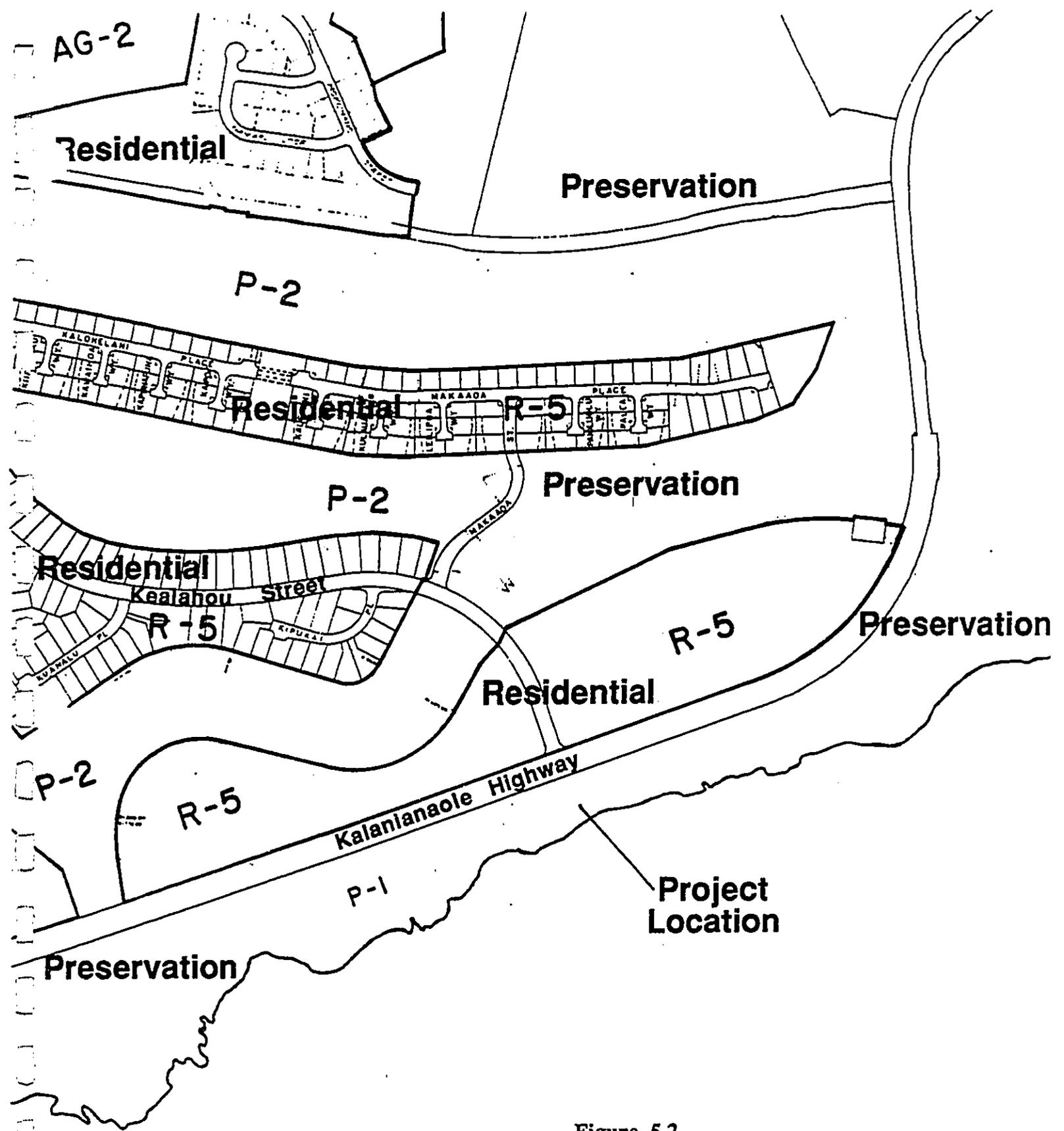
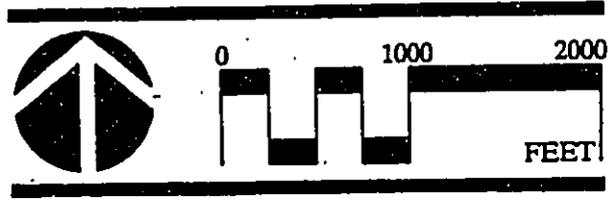


Figure 5-2
 COUNTY ZONING
 Sandy Beach, Oahu



GST Pacwest Telecom Hawaii, Inc.
 HI FiberNet

R. M. TOWILL CORPORATION

JANUARY 96

"5.10-1 Preservation uses and development standards.

- (a) Within the P-1 restricted preservation district, all uses, structures and development standards shall be governed by the appropriate state agencies.

According to the LUO because the proposed activities are in the State Conservation District, development standards would be governed by the Department of Land and Natural Resources (DLNR), through the CDUP process. Therefore, no zoning change will be required for the Sandy Beach Park landing site.

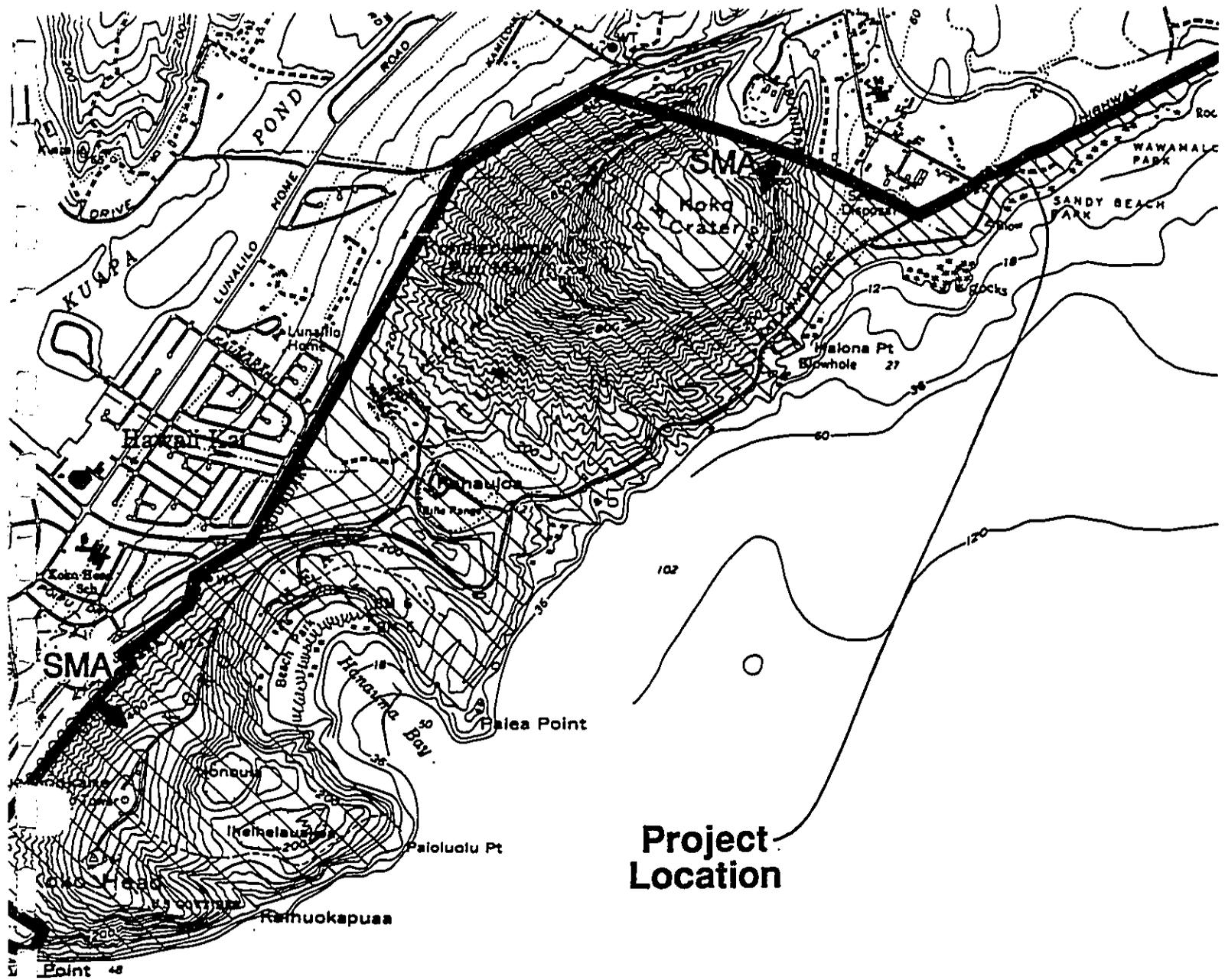
5.5 CITY AND COUNTY OF HONOLULU GENERAL PLAN

The General Plan of the City and County of Honolulu provides a statement of long range social, economic, environmental, and design objectives for the Island of Oahu and a statement of policies necessary to meet these objectives. A specific objective of the General Plan relating to the proposed project is the maintenance and expansion of existing utilities systems. The proposed project is generally in conformance with the goals and objectives of the City and County General Plan.

5.6 SPECIAL MANAGEMENT AREA

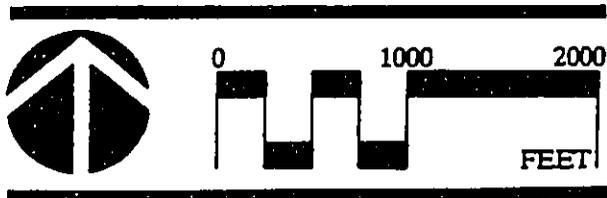
The City and County of Honolulu has designated the shoreline and certain inland areas of Oahu as being within the Special Management Area (SMA). SMA areas are felt to have a sensitive environment and should be protected in accordance with the State's coastal zone management policies. The proposed landing site at Sandy Beach Park is within the SMA Boundary as defined by the City and County of Honolulu (Figure 5-3).

GST Pacwest Telecom Hawaii, Inc., is requesting shared use of existing GTE Hawaiian Tel manholes and ductlines to land and connect the terrestrial portion of its interisland fiber optic cable system. Two alternatives, therefore, are proposed: The first alternative will involve excavation from the shoreline to new handholes and ductlines which would be constructed to accept the cable; and, the second alternative would involve use of existing GTE Hawaiian Tel manholes and ductlines. If a new handhole is constructed an SMA Permit will be filed. However, if the existing GTE Hawaiian Tel facilities are utilized, the work may be limited to the requirements of a Shoreline Setback Variance. This will be based on the following rationale:



**Project
Location**

**Figure 5-3
SPECIAL MANAGEMENT AREA
(SMA) BOUNDARY
Sandy Beach, Oahu**



**GST Pacwest Telecom Hawaii, Inc.
HI FiberNet**

R. M. TOWILL CORPORATION

JANUARY 96

- An SMA permit has previously been filed and approved for the proposed landing site. Potential for impacts related to earthwork and construction were addressed during this prior permit. There were very few to no impacts associated with this cable landing site.
- The site has already been prepared to accept a fiber optic cable. The work required at the shoreline will only involve excavation to expose the end of the ductline and placement of the fiber optic cable into the ductline.
- Only a very small portion of the SMA would be subject to the proposed activity. The end of the ductline which will accept the cable has been designed to terminate at the certified shoreline. All other work along Kalaniana'ole Highway will be undertaken within the highway right-of-way.

5.7 SHORELINE SETBACK VARIANCE

A Shoreline Setback Variance (SSV) will be required for the proposed Sandy Beach landing site because the project will require siting cables from the certified shoreline, to the open end of the ductlines that would accept the fiber optic cables. The proposed project, therefore, will be subject to the provisions of the Shoreline Setback Rules and Regulations of the City and County of Honolulu.

SECTION 6
ALTERNATIVES TO THE PROPOSED ACTION

6.1 NO ACTION

The no action alternative would result in the lost opportunity to provide an alternative to existing interisland telecommunications service which is now provided solely by a single vendor. A major feature would be the loss of a new competitor to the marketplace that could benefit both government and the private sector through competitive pricing.

In addition to the lost opportunity imposed by *no action*, the following would also result:

- Lost employment opportunities which would have been realized in conjunction with the cable laying, and subsequent maintenance and operation activities;
- Lost tax revenues for State government from the cable vendor, and increased public and private telecommunications usage; and
- Lost attainment of the City and County of Honolulu General Plan's objective of expansion of existing utilities systems.

6.2 ALTERNATIVE SITES

The area initially considered for the east Oahu cable landing extended from the Hawaii Kai Marina entrance channel to the north end of Kailua Bay, a distance of approximately 18 miles. The areas initially considered but not selected are discussed below:

Hawaii Kai

Disadvantages at this location include the lack of offshore sand deposits and sandy beaches to utilize for a cable landing. The fringing reef off Hawaii Kai is approximately 3,500 feet wide and is environmentally sensitive.

Makapuu Beach

A sand channel extending seaward from the south side of the beach provides a potential cable route. However, extremely heavy recreational use and the difficulty of heavy equipment access to that part of the beach precluded further consideration of this site.

Makai Research Pier

"An advantage of this site is that the cable could make landfall at the end of the pier, thereby shortening the ocean route by 900 feet, and eliminating passage through the surf zone. However a 30 foot vertical ledge drops to the 60 to 70 foot water depth 5,000 feet from the end of the pier. The cable would require protection from the ledge shoreward (Sea Engineering, January 1992)."

Waimanalo Beach

Waimanalo Beach possesses a poor shoreline and nearshore access. "A shallow reef defines the seaward boundary of Waimanalo Bay, and also marks the end of the sand bottom. The reef is 4 to 8 feet deep and is very irregular. This zone extends seaward for approximately 2000 feet. This shallow reef would present a formidable obstacle to cable placement, since this zone is also subjected to significant wave energy. Seaward of this zone, the bottom is limestone rock and coral. There are no sand channels or deposits (Sea Engineering, January 1992)." Also there is a potential for discovery of archaeological remains according to the Department of Land and Natural Resources Historic Sites Office

Kailua Bay

Kailua Beach has extremely difficult offshore conditions involving an extensive and shallow reef and predominately hard bottom. "There is one large offshore sand channel, but it is very irregular with steep ledges on its borders (Sea Engineering, January 1992)." Other constraining factors are the potential for discovery of archaeological remains and major public use impacts.

6.3 ALTERNATIVE TECHNOLOGY

The following describes the alternatives to fiber optic cable technology:

6.3.1 Microwave Radio Systems

The use of additional or modification of existing interisland microwave radio systems is not a feasible alternative due to the linear arrangement of the main Hawaiian Islands. The linear arrangement of the main Hawaiian Islands limits the possible transmission paths between the

islands and leads to transmission congestion. Problems associated with transmission congestion include:

- Introduction of distortion to voice band data and voice transmission; and
- Loss of signal strength and signal reliability.

In comparison with microwave radio systems, fiber optic technology is the only means of providing the bandwidth necessary for interisland digital circuits without distortion in data transmission, and problems with signal strength and reliability.

6.3.2 Satellites

Satellites are not a feasible alternative based extreme disadvantages associated with the use of satellites which include:

- Transmission delays due to technical and atmospheric limitations involving the distance the radio waves must travel;
- Visual and aesthetic intrusion caused by the need for ground stations and radio antennas which must be constructed to accept the satellite transmissions; and
- Difficulties associated with "double hops" which occur when data must be retransmitted in order to establish a secure voice circuit.

In comparison with satellites, fiber optic technology is the only means of providing the capacity necessary for interisland digital circuits without transmission delays and major visual and aesthetic problems.

6.4 RECOMMENDED ACTION

The recommended action is to proceed with the establishment of the proposed submarine fiber optic cable system landing at Sandy Beach Park.

SECTION 7
RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF
THE ENVIRONMENT AND THE MAINTENANCE AND
ENHANCEMENT OF LONG-TERM PRODUCTIVITY

No short-term exploitation of resources resulting from development of the project site will have long-term adverse consequences. The appearance of the land portion of the existing site will not be altered. The cable may be visible on the ocean bottom portion of the project site and will alter its appearance.

Once construction activities are completed there will be no affect on recreational activities, marine life, or wildlife.

Long-term gains resulting from development of the proposed project include provision of more effective State telecommunications systems (by means of fiber optic cables). The proposed project will maintain and enhance economic productivity by increasing competitive telecommunications service between islands.

SECTION 8
IRREVERSIBLE/IRRETRIEVABLE COMMITMENT OF
RESOURCES BY THE PROPOSED ACTION

Development of the proposed project will involve the irretrievable loss of certain environmental and fiscal resources. However, the costs associated with the use of these resources should be evaluated in light of recurring benefits to the residents of the region, the State of Hawaii and the City and County of Honolulu.

It is anticipated that the construction of the proposed project will commit the necessary construction materials and human resources (in the form of planning, designing, engineering, construction labor, landscaping, and personnel for management and maintenance functions). Reuse for much of these materials and resources is not practicable. Although labor is compensated during the various stages of development, labor expended for project development is non-retrievable.

SECTION 9
NECESSARY PERMITS AND APPROVALS

9.1 STATE

Department of Land and Natural Resources

Conservation District Use Permit

Right-of-Entry

Establishment of Offshore Easement

Office of State Planning

Coastal Zone Management Consistency Review

Department of Health

Section 401 Water Quality Certification

Department of Transportation

Permit to Work in Ocean Waters

9.2 CITY AND COUNTY OF HONOLULU

Department of Land Utilization

Special Mangement Area Permi.

(Contingent on need for construction of new handholes and ductlines)

Shoreline Setback Variance

9.3 FEDERAL

U.S. Army Corps of Engineers

Department of the Army Permit, Section 404/Section 10

SECTION 10
CONSULTED AGENCIES AND PARTICIPANTS
IN THE PREPARATION OF THE ENVIRONMENTAL ASSESSMENT

10.1 FEDERAL AGENCIES

U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
National Marine Fisheries Service

10.2 STATE AGENCIES

Department of Land and Natural Resources
 Land Division
Department of Health
Department of Business, Economic Development & Tourism
Department of Transportation
 Harbors Division
 Highway Division

10.3 CITY AND COUNTY OF HONOLULU

Department of Land Utilization
Department of Public Works
Department of Parks and Recreation

10.4 INDIVIDUALS AND GROUPS

Hawaii Kai Neighborhood Board, Mr. Charlie Roger, Chairperson
Sierra Club, Oahu Group, Hawaii Chapter, Mr. Philip Bogetto

SECTION 11
COMMENTS AND RESPONSES TO THE
DRAFT ENVIRONMENTAL ASSESSMENT

The following comments and responses to comments were prepared during the Draft Environmental Assessment comment phase.

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU
 430 SOUTH KING STREET, 31ST FLOOR - HONOLULU HAWAII 96813
 PHONE (808) 523-4614 • FAX (808) 527-6743



PATRICK ONISHI
 DIRECTOR
 CONTRACTOR CHIEF
 DEPUTY DIRECTOR
 96/SMA-037 (DT)
 96/SV-004 (DT)
 96/SV-005 (DT)

August 9, 1996

DK	RTS	
EST	EA	RF
REC'D AUG 12 1996 BHTC		

Mr. Brian Takeda
 R.M. Towill Corporation
 420 Waiakamilo Road, Suite 411
 Honolulu, Hawaii 96817-4941

Dear Mr. Takeda:

Project Name : GST Pacwest Telecom Hawaii, Inc. Submarine
 Fiber Optic Cable Landing
 File Nos. : 96/SMA-037 (DT), 96/SV-004 (DT), and
 96/SV-005 (DT)
 Tax Map Keys : 5-3-8-12: por. 02, 3-9-10: por. 03,
 8-4-01: por. 12, and 8-1-01: por. 18
 -t.t.

We are forwarding copies of all comments we have received relating to the Draft Environmental Assessment (DEA) of the above-referenced project.

In accordance with the provisions of Chapter 343, HRS, you must respond in writing to these and any other comment which were received during the 30-day comment period which began with publication of a notice of availability of the DEA in the Environmental Notice on July 8, 1996. The final Environmental Assessment must include these comments and response, as well as revised text, if appropriate.

If you have any questions, please contact Dana Teramoto of our staff at 523-4648.

Very truly yours,

Patrick T. Onishi
 PATRICK T. ONISHI
 Director of Land Utilization

PTO:am
 Enclosures
 9:59188437.djt

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU
 430 SOUTH KING STREET, 31ST FLOOR - HONOLULU HAWAII 96813
 PHONE (808) 523-4341 • FAX (808) 527-5877



SECRETARY GENERAL
 DIRECTOR GENERAL
 GABRIEL J. HANAWALT
 HAWAII DIRECTOR
 ENV 96-138

June 14, 1996

MEMORANDUM

TO: PATRICK T. ONISHI, DIRECTOR
 DEPARTMENT OF LAND UTILIZATION

FROM: *Kenneth E. Sprague*
 DIRECTOR AND CHIEF ENGINEER

SUBJECT: ENVIRONMENTAL ASSESSMENT (EA)
 SUBMARINE FIBER OPTIC CABLE LANDING
 GST PACWEST TELECOM HAWAII, INC.
 THK: VARIOUS

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

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

R. M. TOWILL CORPORATION

420 WAIKEMUI RD #411 HONOLULU HI 96817-4041 (808) 648-1133 FAX (808) 648-1037

August 17, 1996

Mr. Kenneth E. Sprague
Director and Chief Engineer
Department of Public Works
City and County of Honolulu
650 South King Street, 11th Floor
Honolulu, Hawaii 96813

Dear Mr. Sprague:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable
Landing Sites at Sandy Beach Park, Makaha Beach, and Keawaula,
Oahu, GST Telecom Hawaii, Inc.

Thank you for your letter dated June 14, 1996. We appreciate your review of this important project.

Should you or your staff have any further comments please contact us at (808) 642-1133.

Sincerely,



Brian Takeda
Senior Planner

BT/bt
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC



DEPARTMENT OF THE ARMY
PACIFIC OCEAN DIVISION, CORPS OF ENGINEERS
FORT SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF

June 18, 1996

Planning and Operations Division

Mr. Patrick T. Onishi, Director
State of Hawaii
Department of Land Utilization
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Mr. Onishi:

Thank you for the opportunity to review and comment on the Draft Environmental Assessment (DEA) for the Submarine Fiber Optic Cable Landing at Sandy Beach Park, Oahu, Hawaii (TRK 3-9-12: por. 2; 8-4-1: por. 12; and, 8-1-1: por. 18). 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) Our Regulatory Branch is currently reviewing a permit application for the entire cable project. Please contact Ms. Terrell Kelley at 438-9258 (extension 13) for further information and refer to file number 96000247.

b. The flood hazard information provided on page 4-1 of the DEA is correct.

Sincerely,

Linda Hihara-Endo
Dr. Linda Hihara-Endo, P.E.
Acting Chief, Planning
and Operations Division.

R. M. TOWILL CORPORATION

450 WAIKEMAHIO RD #411 HONOLULU HI 96817-1081 (808) 842-1133 FAX (808) 842-1037

August 17, 1996

Dr. Linda Hihara-Endo, P.E.
Acting Chief, Planning and Operations Division
Department of the Army
Pacific Ocean Division
Corps of Engineers
Fort Shafter, Hawaii 96858-5440

Dear Dr. Hihara-Endo:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable Landing Sites at Sandy Beach Park, Makaha Beach, and Keawaula, Oahu, GST Telecom Hawaii, Inc.

Thank you for your letter dated June 18, 1996. We appreciate your review of this important project.

We are currently working with Ms. Terrell Kelley and Ms. Lilly Silva to complete any further requirements of the Department of the Army permit, File No. 96000247. Should you or your staff have any further comments please contact us at (808) 842-1133.

Sincerely,

Brian Takeda
Brian Takeda
Senior Planner

BT/bt
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC

WINSTON J. CAVIARO
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 6TH FLOOR
HONOLULU, HAWAII 96813

90-04526
MEMBER OF THE BOARD
BOARD OF LAND AND NATURAL RESOURCES

DEPUTY
DEPUTY COMMISSIONER
AGRICULTURE DEVELOPMENT
PROGRAM
AQUATIC RESOURCES
CONSERVATION AND
RECREATION
COMMERCIAL AFFAIRS
CONSERVATION AND
RECREATION ENFORCEMENT
CONSERVATION
HISTORIC PRESERVATION
DIVISION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

July 12, 1996

Patrick T. Onishi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Onishi:

SUBJECT: Special Management Area Use Permit (SMP) and Shoreline Setback
Variance, GST Pacwest Telecom Hawaii, Inc. Submarine Fiber Optic
Cable Landing at Sandy Beach Park, Makaha Beach and Keawaula
Maunaloa, Kona, Makaha and Keawa'ula, Wai'anae, O'ahu
TMK: 3-9-12:por. 2; 8-4-1:por. 12; 8-1-1:por. 18

Thank you for the opportunity to review this project. A review of our records shows that there are no known historic sites at the project locations. The cable landings at Makaha and Keawa'ula will be at established easements that have already been developed. Archaeological investigations in the vicinity of Sandy Beach indicate that historic sites along this stretch of coast were destroyed by a tidal wave earlier this century. Thus, it is extremely unlikely that previously undiscovered historic sites will be encountered during excavation for this project. Based on these circumstances, we believe these projects will have "no effect" on historic sites.

Aloha,

Don Hibbard
DON HIBBARD, Administrator
Historic Preservation Division

TD:jk

R. M. TOWILL CORPORATION
420 WAIKAMAHIO RD #211 HONOLULU HI 96817-4951 (808) 842-1133 FAX (808) 842-1037

August 17, 1996

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

Dear Mr. Hibbard:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable
Landing Sites at Sandy Beach Park, Makaha Beach, and Keawaula,
Oahu, GST Telecom Hawaii, Inc.

Thank you for your letter dated July 12, 1996. We appreciate your review of this important project and your finding of "no effect" on historic sites.

Should you or your staff have any further comments please contact us at (808) 842-1133.

Sincerely,

Brian Takeda

Brian Takeda
Senior Planner

BT/bt
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC

Engineers • Planners • Photogrammetrists • Surveyors
Construction Managers • Environmental Services

BENJAMIN J. CAVETANO
COMMISSIONER



GARY GILL
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

270 SOUTH KING STREET
FOURTH FLOOR
HONOLULU, HAWAII 96813
TELEPHONE 595-1415
FACSIMILE 595-4158

July 8, 1996

DK	RTS
WES	NZ
VRT	FE
REC'D JUL 9 1996 RMT/C	

Patrick K. Onishi, Director
Department of Land Utilization
650 South King Street
Honolulu, Hawaii 96813

Attention: Dana Teramoto

Dear Mr. Onishi:

RE: Draft Environmental Assessments (EAs) for GST Pacwest Submarine Fiber Optic Cable Landings on Oahu at:
 > Keawaula and Makaha Beach Park, Waianae
 > Sandy Beach Park, Koolauapoko

In the final EAs please include the following:

1. Community contacts: For all three sites, consult with community groups or interested organizations and document your contacts.
2. Special Management Area Permit: What is the anticipated filing date of this permit for the Sandy Beach site if GTE Hawaiian Tel will not allow shared use of facilities?
3. Why are there two cable landing sites on the Waianae coast instead of one?
4. Include a copy of a letter or Memorandum of Understanding from AT&T and/or Teleglobe Canada regarding shared use of facilities at Keawaula and Makaha Beach Park.

If you have any questions, call Nancy Heinrich at 586-4185.

Sincerely,

GARY GILL

c: Brian Takeda, RM Towill
Robert Volker, GST Pacwest Telecom

R. M. TOWILL CORPORATION

420 WAIANAE RD #411 HONOLULU HI 96817-4041 (808) 842-1133 FAX (808) 842-1037

August 22, 1996

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

ATTN: Ms. Nancy Heinrich

Dear Mr. Gill:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable
Landing Sites at Sandy Beach Park, Makaha Beach, and Keawaula,
Oahu, GST Telecom Hawaii, Inc.

We have received your comments dated July 8, 1996, and have prepared the following response.

1. *Community Contacts*

The following groups and individuals have been contacted for the Oahu landing sites:

Sierra Club, Hawaii Chapter, Oahu Group (538-6616),
Mr. David Frankel
Mr. Phillip Bogetto

Hawaii Kai Neighborhood Board No. 1
Mr. Charlie Rogers, Chairperson (955-1386)

Wai'anae Coast Neighborhood Board No. 24 (523-4380)
Mr. Glen Kila, Chairperson

2. *Special Management Area (SMA) Use Permit*

The filing date of the SMA permit for Sandy Beach was May 22, 1996. The subject application describes both the use of existing GTE Hawaiian facilities as well as potential need for a new manhole. At this time we are anticipating use of the existing GTE Hawaiian Tel manhole and ductlines.

3. *Two cable landing sites on the Wai'anae coast*

According to GST Telecom Hawaii, Inc., there is need for two landing sites based on connection requirements with AT&T cable systems. The Makaha landing will provide a direct linkage to Lihue, Kauai. The connection between Keawaula and Makaha is designed to provide system safety and redundancy in the event of unforeseen circumstances including natural and man-induced disasters within the Farrington Highway corridor.

Engineers • Planners • Photographers • Surveyors
Construction Managers • Environmental Services

Mr. Gary Gill
August 22, 1996
Page 2

This is an especially important consideration given that the proposed linkage will help to protect and preserve telecommunications traffic with Kauai as well as national and international localities.

4. *Memorandum of Understanding for shared facilities at Makaha Beach and Keawaula*

We have attached a letter dated May 13, 1996, identifying good faith negotiations by AT&T to provide GST Telecom Hawaii, Inc., access to cable landing facilities at Makaha Beach and Keawaula, Oahu. At this time we are working with AT&T on engineering details to connect the GST cable to its facilities.

Thank you for this opportunity to comment. Should you have any further questions please contact us at 842-1133.

Sincerely,

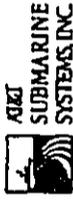


Brian Takeda
Senior Planner

Attachments
BT/bt

cc Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC

Trade to work - Cable Sea screen 5/13/96



Robert T. Miller
Director
Network Support

Room S110
340 Mt. Kemble Avenue
Morristown, NJ 07960
Tel: 1 201 326 3032
Fax: 1 201 326 2470

May 13, 1996

Mr. William H. Martin
Senior Vice President
GST Telecommunications, Inc.
91-238 Kalaheo Blvd.
Suite 230
Kapolei, HI 96707

Fax: 808-682-7630

Bill,

This letter will confirm that AT&T-SSI and GST Telecommunications, Inc. are in active negotiations in good faith to install a fiber optic submarine cable system linking the islands of Molokai, Lanai, Oahu, Hawaii, Maui and Kauai. On the island of Oahu, the cable system is expected to land at the AT&T Keawala and Makaha cable stations.

Negotiations are also being conducted to provide GST with access to the Keawala and Makaha cable stations under a separate agreement subordinate to the submarine cable station supply contract. These negotiations are intended to provide enough space at both cable stations to support GST's requirements for submarine terminals, equipment to convert from the SONET protocol of HFN to the SDH protocol of international cables, and any necessary connecting equipment.

Regards,


Robert T. Miller

R. M. TOWILL CORPORATION

120 WAIKEMAHIO RD #411 HONOLULU HI 96817-4941 (808) 842-1133 FAX (808) 842-1037

August 22, 1996

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

Dear Ms. Hanaïke:

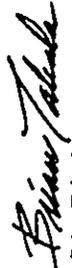
SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable
Landing Sites at Sandy Beach Park and Makaha Beach, Oahu, GST
Telecom Hawaii, Inc.

We have received your comments dated July 2, 1996, and have prepared the following response.

Our client, GST Telecom Hawaii, Inc., has advised us they intend to comply with the terms outlined by your Department via letter referenced above. We will initiate discussion with your staff, Mr. Lester Lai, Advance Planning Branch, during preparation of the engineering drawings for the Sandy Beach Park and Makaha Beach segments of the project.

Thank you for your assistance with this important project. Should you have any further comments or questions please contact us at (808) 842-1133.

Sincerely,


Brian Takeda
Senior Planner

BT/bt
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC

96-0457



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P.O. BOX 511
HONOLULU, HAWAII 96813

JUL 16 1995

MICHAEL D. WILSON
Chairman
Board of Land and Natural Resources

DEPT. OF LAND AND NATURAL RESOURCES

AGRICULTURE DEVELOPMENT
AQUATIC RESOURCES
BOATING AND BOAT REGISTRATION
COASTAL ZONING
CONSERVATION
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND USE
PLANNING
SOIL CONSERVATION
WATER RESOURCE MANAGEMENT

Honorable Patrick T. Onishi
Page 2

You or your staff have any questions, please feel free to call on Dean Y. Uchida, Administrator, Land Division at 587-0446 or Glenn Y. Taguchi at 587-0414.

HAWAII: Earth's best!

Aloha,

Ref: DLM-GYT96-10040

Honorable Patrick T. Onishi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Onishi:

Subject: Request for Comments-Special Management Area Use Permit and Shoreline Setback Variance
Project Name: GST Pacwest Telecom Hawaii, Inc.
Submarine Fiber Optic Cable Landings at Sandy Beach, Makaha Beach and Keawaula, Oahu
Tax Map Keys: 1st/3-9-12:02 (portion), 1st/8-4-01:12 (portion) and 1st/8-1-01:18 (portion).

Reference is made to your request for our review and comments on the environmental assessments prepared for the above-mentioned projects.

Copies of the assessments were transmitted to our different divisions and branches for their review, comments, etc. The responses from our Oahu District Land Office (Attachment A) and the Division of Aquatic Resources (Attachment B) are enclosed.

The Divisions of Water Resource Management and State Parks and the Planning and Technical Services Branch of the Land Division reviewed the assessments and had no comments.

Thank you for the opportunity to comment on this matter. Should

Michael D. Wilson
MICHAEL D. WILSON

C: Michael H. Nekoba
Colbert M. Matsumoto, Esq.
Oahu District Land Office

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
Land Division
Honolulu, Hawaii
June 17, 1996

File No.: GYT96-10020
Suspend Date: 7/1/96

MEMORANDUM

To: FROM:
Aquatic Resources
Boating and Ocean Recreation
Conservation & Resources Enforcement
Historic Preservation
State Parks
Water Resource Management
Land Division: Planning & Technical Services
Engineering Branch
Oahu District Land Office

FROM: Dean Y. Uchida, Administrator

SUBJECT: Request for Comments - Draft Environmental Assessment for Submarine Fiber Optic Cable Landing at Sandy Beach Park, Makaha Beach and Keawaula, Oahu, Hawaii

Tax Map Keys: 1st/3-9-12:02 (portion), 1st/8-4-01:12 (portion) and 1st/8-1-01:18 (portion)

Please review the attached:

1. Draft Environmental Assessment for Submarine Fiber Optic Cable Landing at Sandy Beach Park, Oahu, Hawaii; and
2. Draft Environmental Assessment for Submarine Fiber Optic Cable Landings at Makaha Beach and Keawaula, Oahu, Hawaii.

and submit your comments within the time requested above. If more time is required, please call Glenn Y. Taguchi at 587-0439.

If no response is received by the suspend date, we will assume there are no comments.

Attachments

- We have no comments.
 Comments attached.
 We have no objections.

Signed: *John Dooly* ^{CSG}
Date: 7/24/96

Attachment A

Comments

The Oahu District Office of the Land Division has concerns about the impact of various fiber optic cable landings on the shorelines of Oahu. The Keawaula, Oahu location is currently sparsely utilized by beachgoers, but may be much more intensely utilized in the near and mid term future development plans for the island of Oahu. Sandy Beach Park and Makaha Beach are heavily used by the public at the present time and there are already cable landing sites at all three locations.

We concur with the usage of lands adjacent to the current cable landing sites for future cable landing sites. However, we feel that an Environmental Impact Statement would be justified as shorelines heavily utilized by cable landings, which will not be removed after they are deemed antiquated, may well have a significant impact on the public in the future. ^{CSG}

RECEIVED
 DIVISION OF LAND AND NATURAL RESOURCES
 DEPARTMENT OF LAND AND NATURAL RESOURCES
 Land Division
 Honolulu, Hawaii
 June 17, 1996

JUN 5 2 02 PM '96

FO

DIVISION OF AQUATIC RESOURCES	
DATE	6/17/96
BY	[Signature]
REASON	Request for
COMMENTS	See above
STATE NO.	15-10020
FILE NO.	15-10020
PROJECT	Optic Cable
LOCATION	Maui
STATUS	Request for
APPROVAL	Request for
DATE	6/17/96
BY	[Signature]

File No.: GY796:10020
 Suspend Date: 5/1/1996

MEMORANDUM

TO: Aquatic Resources
 Boating and Ocean Recreation
 Conservation & Resources Enforcement
 Historic Preservation
 State Parks
 Water Resource Management
 Land Division: Planning & Technical Services
 Engineering Branch
 Oahu District Land Office

RECEIVED
 JUN 18 1996

FROM: Dean Y. Uchida, Administrator *[Signature]* **DM. of Aquatic Resources**

SUBJECT: Request for Comments - Draft Environmental Assessment for Submarine Fiber Optic Cable Landing at Sandy Beach Park, Makaha Beach and Keawaula, Oahu, Hawaii
 Tax Map Keys: 1st/3-9-12:02 (portion), 1st/8-4-01:12 (portion) and 1st/8-1-01:18 (portion)

Please review the attached:

1. Draft Environmental Assessment for Submarine Fiber Optic Cable Landing at Sandy Beach Park, Oahu, Hawaii; and
2. Draft Environmental Assessment for Submarine Fiber Optic Cable Landings at Makaha Beach and Keawaula, Oahu, Hawaii.

and submit your comments within the time requested above. If more time is required, please call Glenn Y. Taguchi at 587-0439.

If no response is received by the suspend date, we will assume there are no comments.

Attachments

- () We have no comments.
- () Comments attached.
- () We have no objections.

Signed *[Signature]*
 Date: 7-3-96

Attachment B

1-18-96

Suspense Date: 7-1-96

State of Hawaii
Department of Land and Natural Resources
DIVISION OF AQUATIC RESOURCES

Date 7-3-96

TO: William S. Devick, Acting Administrator *WSD*
FROM: Francis G. Oishi, Aquatic Biologist
SUBJECT: Comments on Environmental Assessments (EA)

Comment Requested by:	Date	Request	Receipt	Referral
D. Uchida, Land	of:	6-17	6-18	6-20

Summary of Proposed Project

Title: Submarine Fiberoptic Cable Landings
Project by: GST Pacwest Telecom Hawaii, Inc.
Location: Sandy Beach, Makaha Beach, Keawaula (Yokohama) Beach, Oahu

Brief Description: Our Division of Land is circulating a request for review and comment from the City and County of Honolulu Department of Land Utilization. Requested for review are EAs produced by GST for their application for Special Management Area permit and Shoreline Setback Variance. Permit and Variance are needed to lay a system of submarine fiberoptic cable that would come ashore for land links at the above-mentioned locations.

For two locations (Makaha and Keawaula), GST proposes and has secured agreements with existing cable easement holder, AT&T. For the Sandy Beach location, the easement is held by GTE and negotiations to share cable easement are pending.

Should agreements to share cable easements be attained for all three locations, cable laying would involve retrenching of the existing easements in the shoreline area and within nearshore waters to varying

lengths. If agreement with GTE is not attained, GST would have to excavate a new alignment to come ashore but will still accomplish the land link near the existing GTE site.

Expected impacts associated with this proposal are turbidity from sediments suspended in the nearshore waters during construction, destruction of marine environment along the cable alignments, and closure and lost use of the shoreline and surrounding nearshore waters during construction. Impacts are assessed as not significantly impacting the marine environment or nearshore water quality.

Comments: The cable diameter is described as ranging from 17 - 51 mm, roughly 2 inches in diameter at maximum. In the section that describes construction, trenching may range from one to two feet widths. Any trenching allowed for the burying of cable should be restricted to a minimal width sufficient to accommodate cable of this size. This would avoid unnecessary dredging of the marine substrate and associated biota.

Further, the EA discusses two cable protection options: burying or covering by split pipe. Under the split pipe option, the cable would be protected by being covered with split pipe secured to hard substrate with nails or pins. This option is preferred as it probably would result in less impact environmentally.

The subject documents describe in the Introduction, a plan to have "branches" of the main cable making landfall at Manele Bay, Lanai and Kaunakakai, Molokai. Although not a concern of this petition process (since this only deals with the City and County of Honolulu), opposition must be expressed for cable laying in Manele Bay. The entire Manele Bay is part of the larger Manele-Hulopoe Marine Life Conservation District (MLCD). This MLCD was established to protect pristine coral reefs and marine life of this area. Intrusion resulting from construction work and the cable itself is an inappropriate use for such a ecologically sensitive area.

R. M. TOWILL CORPORATION

420 WAIKAMUI RD #411 HONOLULU HI 96817-4041 (808) 842-1133 FAX (808) 842-1037

August 27, 1996

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

Dear Mr. Wilson:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable
Landing Sites at Sandy Beach Park, Makaha Beach, and Keawaula,
Oahu, GST Telecom Hawaii, Inc.

We have reviewed your comments dated July 16, 1996, and have prepared the following response.

LAND DIVISION CONCERNS

The proposed fiber optic cable is not expected to adversely affect public recreational uses. The cables will be buried in the immediate nearshore from shoreline to below tidal level where it would not be exposed to beach activities.

According to the Draft Environmental Assessment, the bottom zone at Makaha Beach and Keawaula within 200 feet of the shoreline is predominantly sand. The cables are expected to become buried in this sand, as it has for previous fiber optic cables landed there. The bottom zone at Sandy Beach Park within 600 feet of shore is comprised of relatively flat limestone with numerous small to medium boulders, 1 to 2 feet in diameter. Within the bottom zone the cable will be armored for protection. At the nearshore a layer of sand which covers an existing telecommunications cable will also cover the proposed cable.

The life expectancy of the cables are ±50 years. The concern over future obsolescence and abandonment of the cables at the end of this period should be considered in relation to the following:

- At the end of the ±50 year period portions of the exposed cable surface will have been used by marine organisms as a medium for growth. Anemones, corals, barnacles, sponges, and other marine life will have established large or extensive colonies by this time and it could be difficult to visually distinguish these organisms from the surface of the cable (although the cable itself can be electronically located). It is expected that if the cable were to be removed under these conditions, greater environmental damage could result than if the cable were allowed to remain in place; and,
- Although the cables may one day no longer be used for commercial purposes, there may be other uses which could continue to serve the public interest. These uses would include educational, scientific, or humanitarian purposes.

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Construction Managers • Environmental Services

Mr. Michael Wilson
August 27, 1996
Page 2

DIVISION OF AQUATIC RESOURCES CONCERNS

Your staff concern regarding construction practices during installation of the cable have been noted. The following are proposed to mitigate potential for impacts: 1) trenching at the nearshore segment will be restricted to the minimal width necessary to install the fiber optic cable; and 2) where it is necessary to anchor the cable to the ocean bottom, split pipe will be used in preference to trenching.

Concern has also been expressed regarding the proposed project within the Manele Bay, Lanai, Marine Life Conservation District (MLCD). We share your concern over use of this site and will work with your staff to ensure that any proposed work practices will fulfill the requirements of Hawaii Administrative Rules, Chapter 13-30, establishing the MLCD. The appropriate time for this effort will be during the Departmental review of the Conservation District Use Permit (CDUP) application.

Your review of this project has been very much appreciated. Should you have any further comments or questions please contact us at (808) 842-1133.

Sincerely,



Brian Takeda
Senior Planner

BT/bi
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC



OAHU GROUP
SIERRA CLUB, HAWAII CHAPTER
The Arcade Building, Room 201
212 Merchant Street, Honolulu, Hawaii
P.O. Box 2577, Honolulu, Hawaii 96803
Phone: (808) 538-6616

Dana Teramoto
Department of Land Utilization
City and County of Honolulu
650 S. King St. 7th Floor
Honolulu, HI 96813

Dear Ms. Teramoto

The O'ahu Group of the Sierra Club would like to go on record as opposing the granting of any SMA permit or Shoreline Setback Variance for the Submarine Fiber Optic Cable Landings at Sandy Beach if the applicant does not obtain approval from GTE to use existing manholes and ductlines. It is inappropriate to add new handholes and ductlines in the shoreline area -- particularly when existing ones already exist.

We would also request that any work at Sandy Beach, Makaha and Keawaula be closely documented and monitored. Recently, a telecommunication line was placed through Ka'ena Point. Unfortunately, the activity greatly disturbed the area. The contractor enhanced vehicular access to an area that is supposed to be off limits to vehicles. The telecommunications firm also failed to re-vegetate the area. We are quite concerned about the long-term impact of this work on the fragile eco-system.

Native vegetation should be planted in all areas that are disturbed through this activity. The applicant should be required to irrigate these plantings for a minimum of six months to ensure their long-term viability. This requirement will not only restore the natural beauty of an area, but it will also reduce erosion, thereby protecting water quality.

Sand dunes should be restored to their original formation. If heavy equipment compacts the sand, the sand should be turned over to eliminate artificial compaction.

We would like to take this opportunity to remind you of the Department's statutory mandates. HRS 205A-4(a) requires that DLU give full consideration to ecological and esthetic values. HRS 205A-4(b) mandates that the objectives and policies of Chapter 205A are binding on DLU. HRS 205A-2(b)(3) calls for the county to "protect valuable coastal eco-systems . . . from disruption and minimize adverse impacts on all coastal ecosystems." These beach areas and their associate plant life are valuable coastal ecosystems. HRS 205A-2(c)(3)(B) calls for the minimization of the alteration of natural landforms. Such landforms include sand dunes.

Therefore, if DLU grants any permit or variances, it should include the following conditions:

- 1) The applicant shall provide color photographs of the area to be impacted (including the area to be excavated and all nearby areas that may be impacted by heavy equipment).
- 2) The applicant shall submit color photographs of the area after construction and once again six months after construction.
- 3) The applicant shall restore all beach areas to their pre-existing condition (including height and compaction).
- 4) The applicant shall plant native vegetation (such as naupaka and 'ilima) and provide water to these plants for a minimum of six months.

Thank you for your consideration.

Sincerely,

Philip Bogetto
Philip Bogetto

94-04527

July 15, 1996

R. M. TOWILL CORPORATION

420 WAIKANAHE RD #411 HONOLULU HI 96817-4941 (808) 842-1133 FAX (808) 842-1037

August 27, 1996

Mr. Philip Bogetto
Sierra Club, Hawaii Chapter, Oahu Group
The Arcade Building, Room 201
212 Merchant Street
Honolulu, Hawaii 96803

Dear Mr. Bogetto:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable
Landing Sites at Sandy Beach Park, Makaha Beach, and Keawaula,
Oahu, GST Telecom Hawaii, Inc.

We have reviewed your comments dated July 15, 1996, and have prepared the following in response.

The proposed project will use existing landing facilities owned by GTE Hawaiian Tel (Sandy Beach Park) and AT&T (Makaha Beach and Keawaula). AT&T has already authorized use of the Makaha and Keawaula landings. Good faith discussions between GST and GTE Hawaiian Tel are ongoing for Sandy Beach Park. We are hoping for a signed agreement shortly.

The environmental permitting process requires that Best Management Practices (BMPs) be developed to ensure sufficient protection of the nearshore and ocean portions where the fiber optic cable will be landed. Many of the conditions you have recommended will be included as part of the project BMPs. These conditions will involve restoration of the landing site contours and any land portions utilized for the landing; where applicable disturbed landing sites will be revegetated with native flora; and, documentation of the site for preconstruction and postconstruction conditions shall be by photographs.

Thank you for your review of this important project. Should you have any further comments or questions please contact us at (808) 842-1133.

Sincerely,


Brian Takeda
Senior Planner

BT/bt
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMT/C

Engineers • Planners • Photographers • Surveyors
Construction Managers • Environmental Services

DEPARTMENT OF HEALTH
STATE OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
PO BOX 1378
HONOLULU, HAWAII 96811

96-04906

LAWRENCE J. CATELAND
COMMISSIONER OF HEALTH

91-398A/epo

July 23, 1996

Mr. Patrick Onishi, Director
Department of Land Utilization
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Onishi:

Subject: Environmental Assessment
Project within the Special
Shoreline Setback Variance
Project Name: GST PacWest Telecom Hawaii, Inc.
Submarine Fiber Optic Cable Landing
Location: Sandy Beach, Makaha Beach, and Keawaula
THK: 8-1-01: por. 18, 3-9-12: por. 02, and
8-4-01: por. 12

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

1. Activities associated with the construction phase of the project must comply with the provisions of Title 11, Hawaii Administrative Rules, Chapter 43, "Community Noise Control for Oahu."
 - a. The contractor must obtain a noise permit if the noise levels from construction activities are expected to exceed the allowable levels of the rules.
 - b. Construction equipment and on-site vehicles requiring an exhaust of gas or air must be equipped with mufflers.
 - c. The contractor must comply with the conditional use of the permits as specified in the regulations and conditions issued with the permit.
 - d. If night work is required, the contractor must obtain a community noise variance if the noise levels from the activities are expected to exceed the allowable levels of the regulations.

Mr. Patrick Onishi
July 23, 1996
Page 2

91-398

2. Heavy vehicles traveling to and from the project site must comply with the provisions of Title 11, Hawaii Administrative Rules, Chapter 42, "Vehicular Noise Control for Oahu."

Should you have any questions, please contact Mr. Jerry Haruno, Environmental Health Program Manager of the Noise, Radiation and Indoor Air Quality Branch at 586-4701.

Sincerely,

Bruce S. Anderson

BRUCE S. ANDERSON, Ph.D.
Deputy Director for Environmental Health

C: NR&IAQB

R. M. TOWILL CORPORATION

420 WAIKANEHUI RD #411 HONOLULU HI 96817-4041 (808) 842-1133 FAX (808) 842-1037

August 27, 1996

Dr. Bruce S. Anderson, Ph.D.
Deputy Director for Environmental Health
State Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Dr. Anderson:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable
Landing Sites at Sandy Beach Park, Makaha Beach, and Keawaula,
Oahu, GST Telecom Hawaii, Inc.

We have reviewed your comments dated July 23, 1996, and have prepared the following response.

GST Telecom Hawaii, Inc., intends to fully comply with provisions of Hawaii Administrative Rules (HAR), Chapter 11-43, Community Noise Control for Oahu. The items we will address will involve the following:

- The contractor will obtain a noise permit if construction related noise exceeds allowable levels during daytime operations. Similarly, if night work is required the contractor must also obtain a community noise variance if noise is expected to exceed allowable levels;
- Construction equipment and on-site vehicles powered by internal combustion engines are to be equipped with mufflers;
- The contractor must comply with the terms and conditions of any noise permit granted; and,
- Heavy vehicles travelling to and from the construction site will be required to comply with HAR, Chapter 11-42, Vehicular Noise Control for Oahu.

Thank you for your review of this important project. Should you have any further comments or questions please contact us at (808) 842-1133.

Sincerely,

Brian Takeda

Brian Takeda
Senior Planner

BT/bt
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC

Engineers • Planners • Programmers • Supervisors
Construction Managers • Environmental Services



WAIANAЕ COAST NEIGHBORHOOD BOARD NO. 24

c/o Neighborhood Commission
530 S. King St., 4th Floor, Honolulu, HI 96813
August 6, 1996

GST Pacwest Telecom Hawaii, Inc.
91-238 Kalaheo Boulevard, Suite 100
Kapolei, HI 96707
Attn: Robert Volker

Dear Mr. Volker

Subject: Sandy Beach, Makaha Beach and Keawala Submarine Fiber Optic Cable Landings

The Waianae Coast Neighborhood Board No. 24 (WCNB#24) reviewed a proposal published in the Office of Environmental Quality Control Bulletin regarding the above subject.

The WCNB#24 supported a motion to support your request with the condition that you and your consultant contact the WCNB#24 to review the exact location of your construction efforts considering the proximity to a historical site at one of these locations.

The motion passed by the following vote: 13 Ayes, 3 Noes, and 0 Abstentions.

We look forward to hearing from you to help with our knowledge of the area and the exact location of the historical site (heiau) in question.

If you have any questions or wish to discuss our concerns further, please feel free to contact me via Ben Kama at 523-4390, of the Neighborhood Commission

Sincerely,

Glen Kila
Glen Kila
Chairperson
Waianae Coast Neighborhood Board #24

cc: Neighborhood Commission
The Honorable John DeSoto, City Council Chairperson, C&C of Honolulu
Representative Merwyn S. Jones
Representative Mike Kahikina
Senator James Aki
State Office of Environmental Quality Control
City and County of Honolulu, DLJ
R.M. Towill Corporation



Oahu's Neighborhood Board System - Established 1973

R. M. TOWILL CORPORATION

420 WAIANAE RD #411 HONOLULU HI 96817-7041 (808) 842-1133 FAX (808) 842-1037

August 27, 1996

Mr. Glen Kila, Chairperson
Waianae Neighborhood Board #24
c/o Neighborhood Commission
530 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Kila:

SUBJECT: Draft Environmental Assessment for Submarine Fiber Optic Cable Landing Sites at Sandy Beach Park, Makaha Beach, and Keawala, Oahu, GST Telecom Hawaii, Inc.

Thank you for your transmittal dated August 6, 1996, in support of the proposed project. Per your request we will provide you with the exact locations of the proposed work at Makaha Beach and Keawala. The preliminary engineering drawings which will identify the alignments are now being prepared. This information will be provided to you shortly.

Your review of this important project is very much appreciated. Should you have any further comments or questions please contact us at (808) 842-1133.

Sincerely,

Brian Takeda

Brian Takeda
Senior Planner

BT/bt
cc Mr. Jack Lewis, GST Telecom Hawaii, Inc.
CK RMTC

Engineers • Planners • Photogrammetrists • Surveyors
Construction Managers • Environmental Services

REFERENCES

- Atlas of Hawaii, Second Edition*, Department of Geography, University of Hawaii, 1983.
- Bauer, G.B. and L.M. Herman. 1986. *Effects of Vessel Traffic on the Behavior of Humpback Whales in Hawaii*. Prepared for NMFS, Honolulu Laboratory, Hawaii. 140+pp.
- Brock, R.E. 1954. *A Preliminary Report on a Method of Estimating Reef Fish Populations*, Wildlife Management, Vol. 18, pp.297-308,
- Brock, R.E. 1982. *Summary of Observations on the Green Sea Turtle Population in the Area Fronting the West Beach Project Site, Report*. Prepared for West Beach Estates, Honolulu, EAC Rept. No. 90-06. 18p.
- Department of Planning and Economic Development, State of Hawaii, 1990-93 Editions. *The State of Hawaii Data Book 1990; A Statistical Abstract*.
- Environmental Assessment for the GTE Hawaiian Tel Interisland Fiber Optic Cable System; Wailua Golf Course, Kauai; Sandy Beach Park; Mokapu Beach, Maui; Spencer Beach Park, Hawaii*, R.M. Towill Corporation, Honolulu, Hawaii.
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