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July 26, 2007

Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: Finding of No Significant Impact (FONSI) for the Environmental Assessment for the Sand Island State Park - Off Highway Vehicle Riding Area, portion of TMK 1-5-41:6, Honolulu, Oahu, Hawaii

The Department of Land and Natural Resources (DLNR), Divisions of State Parks and Forestry and Wildlife – Na Ala Hele Trail and Access Program, has reviewed the comments received during the 30-day public comment period which began on May 8, 2007. The agency has determined that this project will not have significant environmental effects and has issued a FONSI. Please publish this notice in the next available OEQC Environmental Notice.

We have enclosed a completed OEQC Publication Form and four copies of the final EA. Please call me at 587.0062 if you have any questions.

Curt Cottrell, Program Manager
Division of Forestry and Wildlife
Na Ala Hele Trail and Access Program

FINAL ENVIRONMENTAL ASSESSMENT

Sand Island State Park - Off Highway Vehicle Riding Area

In accordance with:

Chapter 343, Hawaii Revised Statutes

July 2007

Prepared by:

Department of Land and Natural Resources
Divisions of State Parks and Forestry and Wildlife
Na Ala Hele Trails and Access Program - in collaboration with the
Sand Island Off-Highway Vehicle Association

Table of Contents

1. Project Summary

The Sand Island Off Highway Vehicle Riding Area ("Sand Island OHV area" or "project area") is a pilot project, proposed as a collaboration between the Sand Island Off Highway Vehicle Association and the Hawaii Department of Land and Natural Resources, specifically the Division of State Parks and the Na Ala Hele Trails and Access Program, to develop an authorized and managed location for Off Highway Vehicle (OHV) enthusiasts to recreate.

The area proposed for the creation of the Sand Island OHV area is an unused portion of the 141-acre Sand Island State Park, consisting of approximately 32 acres. The location proposed is currently vacant and unmanaged, containing assorted debris and rubbish. The Department and the Sand Island Off Highway Vehicle Association believe that it could easily and inexpensively improved into an off-highway vehicle (OHV) riding area, increasing the use and enjoyment of this area by the public, particularly families who enjoy motorized vehicle recreation. In addition, the area would be a facility to promote safe and responsible OHV activities.

The proposed Sand Island State Park OHV Riding Area would have areas dedicated to particular uses, including off-highway motorcycles, 4x4 vehicles, bicycles (BMX), and all-terrain vehicles (ATVs). Supporting infrastructure would include picnic areas, parking, and temporary toilets and food wagon. The Sand Island OHV area would remain part of the Sand Island State Park, but would be developed and managed by the Sand Island Off-Highway Vehicle Association, a non-profit organization, through a lease from the Board of Land and Natural Resources.

Project Name:	Sand Island State Park OHV Riding Area
Project Location:	1640 Sand Island Parkway-Honolulu 96819
Land Ownership:	State of Hawaii
Tax Map Key:	1-5-41:6 (portion of)
Land Area:	30 Acres/ of 141.382 acres
State Land Use:	Urban District
Zoning:	P-2 General Preservation District
Special Management Area:	Within SMA
Proposing Agency:	Department of Land and Natural Resources P.O. Box 621 Honolulu, Hawaii 96809
Approving Agency:	Department of Land and Natural Resources P.O. Box 621 Honolulu, Hawaii 96809

Agencies/Individuals Consulted:

State:	Aloha Tower Development Corporation Department of Land and Natural Resources: Division of Forestry & Wildlife, Na Ala Hele Program Division of Boating and Ocean Recreation Division of State Parks
County:	Department of Planning Kalihi-Palama Neighborhood Board
Other:	Sand Island Business Association Sand Island Off-Highway Vehicle Association National Off-Highway Vehicle Conservation Council, Hawaii Motorsports Association (HMA), New Hope Church, American Motorcyclist Association (AMA). Senator Suzanne Chun Oakland

Anticipated Determination: Finding of No Significant Impact [FONSI]

Project Background and Need:

The Division of Forestry and Wildlife (DOFAW) facilitated the establishment of an OHV riding area in the 1970s with the non-profit organization Hawaii Motorsports Association on unencumbered State land in Kahuku, responding to a recognized need for the development of an authorized area on O'ahu for motorcycles due to increasing unauthorized motorcycle use on hiking trails. The Kahuku Motorcross Park (KMP) contains over 30 miles of OHV trails covering approximately 500 acres. OHV use on this land is authorized through a Revocable Permit with the Land Division for the operations, management and use of the area as a motorcross park, subject to a Master Lease with the Military. Because of the military lease, use of this popular area is limited to weekends and Federal holidays.

Since the 1970s, OHV use continues to grow. 2000 national recreation statistics indicate that use of personal thrill-craft (snowmobiles, jet skis, ATV's and off-highway motorcycles) is the fastest growing form of outdoor recreational activity in the United States. Unlike many mainland States, county Department of Motor Vehicles in Hawai'i do not license or register OHVs, so precise estimates of the number of users or rate of growth are not available. Few areas in the State are managed for this activity, and frequent use of OHVs without appropriate management can result in accelerated erosion, potential damage to rare plants or native habitat, conflicts with other users of those areas, and create both public safety and trespass issues. As OHV use becomes more popular, incidents of trespass onto private land and unauthorized use of DLNR lands have raised both liability and public safety concerns and on occasion, may result in other social conflicts due to associated sound levels.

Issues of damages to public resources or conflicts with existing users have resulted in increased enforcement and restrictions. During a 2005 Oahu workshop on OHV management sponsored by the Na Ala Hele Program (NAH) and the National Off-Highway Vehicle Conservation Council, a group of O'ahu OHV riders approached Na Ala Hele staff to discuss the possibility of creating a new area for legal OHV use, specifically an unused, 30-acre portion of Sand Island

State Park. Due to its location adjacent to light industrial activity, directly under the flight path of Honolulu International Airport, NAH staff supported the proposal, and dialogue was initiated between Na Ala Hele staff and State Parks staff. With preliminary support from State Parks, the concept was shared with various community representatives and elected officials who represent the area for discussion and to determine if there would be any associated community concerns. To date, the response from the community has been positive and supportive. This project is intended to alleviate growing pressure on public and private lands associated with unauthorized OHV use, and provide a safe and managed location for OHV activity.

2. Project Description

The project area is located on State land and will be a new and ancillary use of Sand Island State Park. As such, the project is subject to an Environmental Assessment that is to be prepared in accordance with Chapter 343 of the Hawai'i Revised Statutes.

This project will provide Oahu OHV enthusiasts with an authorized and managed location to operate OHVs. This project will expand the existing activities offered at the Sand Island State Park. The area proposed is an unimproved portion of Sand Island State Park, consisting of approximately 30 acres. A map illustrating the proposed Sand Island OHV Riding Area is attached as Appendix A. DLNR anticipates that by provide a second authorized location for OHV use on Oahu, illegal OHV use on other sections of both public and private land will be reduced.

The Sand Island Off-Highway Vehicle Association (SIOHVA) has prepared a draft management plan outlining specifications and initial management rules for the OHV riding area. A summary is provided as follows:

The Sand Island OHV Park will be composed of several different trails or "tracks:"

1) **Motocross Track:** This track will be designed for off-highway motorcycles and will be made up of jumps, berms, and flat areas. The size of this track will be approx. 3-4 acres. This track will be made up of soft sand/dirt/clay mixture and will be hard packed in certain areas.

2) **Children's Trail:** A flat trail with rolling hills and soft turns. This is a suitable trail for children and novice riders using small, 50-65 cc motorcycles. The approximate size of this area would be about 2-3 acres. The trail will be a soft sand/dirt/clay mixture

3) **Bicycle Moto Cross (BMX) Trails:** A series of trails that cover approximately 2-3 acres in size and will be a hard packed surface made up of dirt. The trails have similar jumps and berms as the motocross track but its major difference is its overall size, which is smaller since BMX bicycles are non-motorized vehicles.

4) **ATV Course:** This track will have wide jumps and berms and will be designed and built for the beginner to intermediate level ATV riders. This track will be approx. 3-4 acres in size.

5) **4x4 Truck-Rock Climbing Course:** An obstacle course comprised of three levels of difficulty. Use is generally slow and methodical, compared to the other OHV areas.

1. "Stock" course. This is where an individual can take a "Stock" vehicle and carefully negotiate the course.

2. "Modified" course. This course is a little more challenging and is designed for 4x4 vehicles that have been modified.

3. "Expert" course. This course is to be operated by vehicles that have been designed and built for the most challenging obstacles.

Infrastructure:

Planned infrastructure includes restrooms, administrative buildings, a first aid station, judging towers, a food concession, and a parking area. All infrastructure (except the parking area) will be built as temporary structures. Porta-Potties will be the interim choice for restrooms, modified shipping containers will be converted into the administrative building and First Aid Station, and a lunch wagon will provide concession.

The parking area will be made of donated recycled asphalt. The parking area will serve OHV users and their guests, and will also be available for use by the several outrigger canoe club members that also utilize the location.

Method of Construction:

Heavy equipment, such as bulldozers, backhoes, and excavators will be used to create the trails, tracks, and distribute fill material around the Park. The operators will be volunteers with heavy equipment experience. The equipment may either be donated or leased to the Sand Island Off-Highway Association in exchange for "In-Kind" sponsorship or contractual fees. As needed, additional soil and fill may be introduced to the area. Topsoil for landscaping and for trail and track design is anticipated. Potential dust will be controlled with a 2500-gallon water truck and dust screens as needed. An existing soil berm will be modified, improved and landscaped along the makai perimeter of the Park to prevent erosion associated with construction and Park use from the OHV riding area into the near shore waters. The berm dimensions area approximately 3 feet high and 3 feet wide and are documented in approved SMA.

Construction Phases:

Phase I: Reconstruction of the shoreline berm, excavating and cutting of current vegetation (primarily kiawe trees), and construction of the parking lots. Time period of construction is undetermined.

Phase II: Construction of the Motocross track, BMX Track, and Children's Trail. Approximately 2.5 months.

Phase III: Construction of 4x4 course. Approximately 1 month.

Phase IV; Construction of ATV Track. Approximately 2 months.

(Note: Some of the Phases made overlap and shorten the estimated construction time)

Operation:

Initially, the Park will be staffed by volunteers. SIOHVA is exploring the possibility of having full-time employees for the park and its maintenance. Volunteers will be from local clubs and organizations. The organization and staffing will be done by the SIOHVA Board.

Funding to develop and operate the Sand Island OHV Riding Area will come from a Federal grant administered by the State Na Ala Hele program and private match composed of in-kind services and donated equipment provided by the SIOHVA. The Park will also have an entrance fee and a membership fee. The entry fee and membership fee will help offset operating expenses such as insurance, heavy equipment, fuel, administrative costs, and possible employees. Additional funding such as corporate sponsorships, private donations, races and events, and RTP Funding will be sought to alleviate operating costs.

The OHV riding area will be open to the public. Members will receive a discounted rate for entry into the OHV riding area. The OHV riding area will also be available for Private events, Parties, and corporate/organization functions.

The planned Hours of Operation are as follow:

Monday - 10:00 am - 7:00 pm.

Tuesday - Closed

Wednesday - Family Day (1:00 pm to 7:00 pm)

Thursday - Closed

Friday - 10:00 am - 7:00 pm

Saturday - 8:00 am - 7:00 pm

Sunday - 8:00 am - 7:00 pm

Holidays - 8:00 am - 7:00 pm

All OHVs will operate under the current 96db requirement. The OHV riding area's location is directly under the flight pattern of Honolulu International Airport, thus making the sound associated with OHV recreation an incidental impact when compared to the sound and frequency of the overlying aircraft. Its location is also in an industrial area, which eliminates residential sound concerns. Last, the natural wind direction helps to muffle sound.

The BLNR approved this project in concept September 8, 2006. After completion of the environmental review process, the Division of State Parks and the Na Ala Hele Program will submit a proposed lease agreement with the Sand Island OHV Association for review and approval by the Board of Land and Natural Resources. The initial lease is proposed for a two-year term, providing the Sand Island OHV Association with the authority, in consultation and collaboration with State Parks and NAH staff, to design, construct and manage a series of public trails, tracks and riding areas specifically designed for a variety of OHVs, trucks and BMX bicycles. The Sand Island OHV Riding Area would be an ancillary recreational use of the Sand Island State Park.

3. Description of the Affected Environment

General Setting

Sand Island is located adjacent to Honolulu Harbor on the south coast of O'ahu. It is approximately 520 acres in area and shelters Honolulu Harbor from the open ocean. It is connected to the island of O'ahu by a bascule bridge at the western end of the island. Uses on the island include harbor and maritime activities, light industrial activities, and recreational activities within the 140 acres Sand Island State Park. This portion of Sand Island State Park is underused, at times subject to a fluctuating population of indigents and illegal dumping.

The majority of what is now Sand Island is man-made created from dredged material placed over a reef platform that extended seaward from the approximate seaward boundary of the present island. The reef platform was known as Kahololoa Island. Dredged material was added to the platform in the late 1800s to form Quarantine Island (also known as Rainbow Island and Anuenue Island). Additional dredge material from Honolulu Harbor and from the U.S. Navy's dredging of seaplane runways in Keehi Lagoon was used to expand Quarantine Island in the 1930s and 1940s to create what is now Sand Island.

Uses of Sand Island have varied from a quarantine center for immigrants at the turn of the century to its current use for harbor and maritime-related activities and for recreation (at the State Park). Sand Island was controlled by the Federal government (under the War Department) during World War II, returning 200 acres to the State in 1959 and returning the balance, except for 49 acres for the Coast Guard, in 1963. Historical data from 1974 shows the beginning of pipeline construction, substantial open dumping of solid waste and vehicles, with much of the debris emanating from the industrial park adjacent to the east side of the project area. Sand Island State Park was developed after 1975, and an aerial photograph from 1984 showed that the State Recreational Area had been developed and most of the solid waste had been removed or covered with overburden.

The proposed Sand Island OHV Riding Area is located on approximately 30 acres within Sand Island State Park, in a portion of the park that is currently unimproved. The project area is south of the Honolulu Community College for Marine Education Training Center and a state public boat launch area. This boat launch area is actively used for thrill crafts such as jet skis and provides ocean access for both private and commercial water thrill craft activities. The property is north of Oahu's largest municipal sewage Waste Water Treatment Plant (WWTP) facility. There are easements for sewer, electrical, water, and telephone utilities at the site. These easements are generally along the northern boundary of the site. The outfall pipelines from the wastewater treatment plant are underground and run beneath the site to the shoreline at the southern point of the island.

Climate around the project area is typical of leeward coastal lowland areas on O'ahu: sunny, with an average rainfall of 20-25 inches, predominant tradewinds, temperatures between the mid-60's to low 70's (lows) and the high 70's to mid 80's (highs), moderate humidity, and infrequent severe storms.

The topography of the project area is relatively flat with an average slope of less than one percent towards the shoreline. The site parcels rise from a seven foot embankment along the seaward shoreline generally 15 feet towards Sand Island Access Road. There are soil mounds and a continuous berm that stretches along the western shore. The berm and mounds are the result of either defense installations or the accumulated dumping of fill and are about 20 feet

above mean lower low water levels. The surface of these mounds and berms consist of loose soil, various rubbish and debris.(e.g., tires, electronic equipment, and clothing materials), rock pieces of concrete and weed vegetation.

The park is in the State Urban District and is zoned by the county as P-2 General Preservation, but surrounded by I-2 & I-3 Industrial General and Waterfront District Zones. It is within the Special Management Area.

Soils

Soils at the site are classified as Jaucus sand (JaC) and mixed fill land (FL) by the U.S. Department of Agriculture Soil Conservation Service. The Jaucus series consist of excessively drained calcareous soils that developed from wind and water deposited sand derived from coral and seashells. JaC is pale brown to very pale brown sand mixed with organic matter and alluvium. FL consists of areas filled with material dredged from the ocean or hauled from nearby areas, garbage, and general material from other sources.

The fill of the island is classified as Ewa Silty Clay Loam, and is moderately shallow (20 – 50 inches deep). Runoff is very slow and permeability is moderate with a slight erosion potential.

Past historical uses were as follows; Military Reservation motor pool wash/grease rack, laundry/dry cleaning plant, oil storage area, paint shop, open dumping and discarded vehicles.

Flora

Based on initial site reconnaissance, vegetation at the project area consists primarily of introduced weeds. Vegetation surveys in 1978 described the natural flora characteristic of Sand Island as introduced trees, shrubs, and herbs, with the following plants as common: kiawe (*Prosopis pallida*), opiuma (*Pithecellobium dulce*), ironwood (*Casuarina equisetifolia*), haole koa (*Leucocephala leucaena*), and the native herb ʻākulikuli (*Sesuvium portulacastrum*). Because of the project area is on fill material less than 100 years old, and because the project area is in a highly impacted urbanized area that has been subject to illicit dumping, extensive and artificial modification of the landscape, fires associated with camping by indigents, no rare or endangered plants within the project area have been identified.

Fauna

The Sand Island area was surveyed for wildlife in 1977 by the Department of Land and Natural Resources for environmental documentation relating to Honolulu Harbor. Wildlife observed in the area was non-native birds, non-native mammals, and indigenous migratory shorebirds. Table A contains a list of wildlife previously observed in the area.

Table A

Scientific Name	Common Name	Endemic (E), Indigenous (I), Migratory (M), Non-native (N)
Birds		
Bubulcus ibis	Cattle egret	N
Nycticorax nycticorax hoactli	Black-crowned night heron	I
Pluvialis dominca fulva	Pacific golden plover	I, M
Arenaria interpres	Ruddy turnstone	I, M

Heteroscelus brevipes	Wandering tattler	I, M
Calidris alba	Sanderling	I, M
Streptophelia chinensis	Lace-necked dove	N
Geopelia striata	Barred dove	N
Columba livia	Feral pigeon	N
Pyononotus cafer	Red-vented bulbul	N
Acridotheres tristis	Indian mynah	N
Zosterops japonica	Japanese white-eye	N
Carpodacus mexicanus frontalis	House finch	N
Passer domesticus	English sparrow	N
Richmondena cardinalis	Cardinal	N
Paroaria coronata	Brazilian cardinal	N
Mammals		
Rattus rattus	Black rat	N
Rattus norvegicus	Brown rat	N
Mus musculus	House mouse	N
Herpestes auropunctatus	Mongoose	N
Felis silvestris	Feral cat	N
Canis familiaris	Feral dog	N

In addition, endangered shorebirds, including the Hawaiian coot (*Fulica americana*) and the Hawaiian stilt (*Himantopus mexicanus knudseni*) and seabirds, including the brown booby (*Sula leucogaster*), Bulwer's petrel (*Bulweria bulwerii*), Laysan albatross (*Diomeda immutabilis*), Black-footed albatross (*Diomedea nigripes*), Great frigatebird (*Fregata magnificus*), and the wedge-tailed shearwater (*Puffinus pacificus*) were reported to possibly be feeding in the adjacent Keehi Lagoon area, though they have not been observed within the project area.

During site reconnaissance that was conducted on July 13, 2007 by a DOFAW wildlife biologist, one common myna bird *(Acridotheres tristis)* was observed at the entrance to the area. In the course of walking back and forth through the 30-acre area for an hour, 3 spotted doves *(Streptopelia chinensis)* and 2 zebra doves *(Geopelia striata)* were flushed, and 3 separate red-vented bulbuls *(Pycnonotus cafer)* were observed perching on kiawe. Not a single wetland bird or shorebird was seen in or over the area. DOFAW staff will conduct further reconnaissance in January 2008 during the Winter Bird Count.

Archaeological Resources

The Environmental Impact Statement prepared for the creation of Sand Island State Park reported that there were no known areas of archaeological or historical importance on the proposed park portions of Sand Island. There are no recorded sites on the Federal or State of Hawaii Registers of Historic Places within the project area. The EIS for the State Park further noted that because the area consists entirely of filled material, it was unlikely that there were areas of archaeological importance within any of the areas proposed for park use. Similarly, because of the island's non-existence pre-contact, there are no known Native Hawaiian traditional and cultural practices associated with the area. Since the establishment of Sand Island State Park and related construction, there has been no evidence of archaeological features or cultural practices.

Certain structures associated with wartime activities at Sand Island and an old quarantine station have been identified as of potential historical significance, however, no such structures are located within the project area.

4. Alternatives Considered

Two project alternatives are described: development of the proposed Sand Island OHV Riding Area (preferred alternative) and a no-action alternative.

Alternative #1: Develop and operate an OHV riding area for various OHVs at Sand Island State Park (preferred alternative)

As discussed above, the preferred alternative is to develop an OHV riding area on an unimproved portion of Sand Island State Park. Use of OHVs is increasing, and development of this area would provide a managed and authorized location for the operation of these vehicles. In addition, the riding area would provide a forum to educate OHV users about the safe use of these vehicles and the damage these vehicles can do to areas not managed for their use. Development of this area should reduce the amount of illegal OHV activity on both private and public lands, particularly along the south shore. Federal funds are available for the development and operation of this area and O'ahu OHV riders have coordinated to form a non-profit organization to provide in-kind match of labor and equipment needed to develop and operate the riding area. Creation of an OHV riding area would also make a beneficial public use of an area that is currently unmanaged and of limited public use, at no direct cost to the State.

Alternative #2. No action.

This portion of Sand Island State Park will continue to be underused, subject to a fluctuating population of indigents, and illegal dumping. The no-action alternative fails to take advantage of existing funding opportunities and new partnerships to create and operate this area for OHV use. The no-action alternative also fails to provide a solution to the growing problem of illegal and OHV use at unauthorized locations, which is partially caused by the limited number of legal riding areas. With no action, OHV riders are likely to continue to operate their vehicles on State and private lands without permission, causing damage to the natural resources and increasing public safety, trespass and liability concerns. Finally, the no-action alternative reduces the potential for educational opportunities, particularly of the youth who are expected to utilize this area.

5. Impacts

Parking & Traffic

The proposed OHV riding area is served with Industrial Highway Access and existing paved roads. The main entrance from Sand Island Access parkway has traffic lights to control vehicle entry flow to the park. There are no abutting residential districts that may be affected with increased traffic associated with park use. Peak OHV park use would be primarily week-ends, when commercial traffic entering and exiting Sand Island Industrial Area is at its lowest. No impact to commercial traffic is anticipated.

The proposed OHV park includes parking space for potential OHV riders. The proposed parking sites on the OHV park will also service the Boat Launch and ancillary canoe clubs, where existing parking is limited. No negative impacts to existing parking are anticipated.

Wastewater

The proposed OHV park will not require the need for wastewater systems. No washing of vehicles on premises will be allowed. A tire wash rack will be used to minimize transfer of sediment for OHVs onto city roads upon park users exiting the parking area. Wash rack areas will be bermed using BMP (Best Management Practices) to eliminate runoff. No impact on municipal waster treatment facilities is anticipated.

Sanitation

Sand Island State Park has public restrooms and showers. Additional porta-potties will be placed and maintained for sanitation in the Designated Track areas and picnic grounds. Weekend increases in use of these facilities is anticipated, but will be offset by the additional porta-potties that will be available on site. No impact on sanitation anticipated.

Refuse Collection

A "trash in-trash out" policy will be in full force. SIOHV will provide enclosed dumpsters at the park for trash collection and with frequent pick up to prevent overloads. No impact on municipal refuse collection is anticipated.

Drainage

A drainage easement exists on the proposed site. The easement will not blocked and will be maintained unencumbered for drainage. Due to the construction plans and incorporation of BMPs and the soils in the area, no significant changes in the normal runoff or percolation patterns are anticipated as a result of this project. No impact on drainage is anticipated.

Vegetation

Proposed use will not affect any viable vegetation at the site. Existing vegetation is non-native, including kiawe and other weeds. Site will be landscaped and maintained for vegetation control. Because there are no known native plants, whether common, rare, endangered or threatened, in the project area, no impact on native vegetation is anticipated.

Wildlife

The proposed use is not anticipated to impact any native wildlife. The proposed OHV riding area may displace some non-native animals, such as rats and feral cats, that are common to urban and industrial areas, but the impact of this displacement is not anticipated to be significant. No impact on native wildlife is anticipated.

Air

Limited air pollution from the use of construction equipment will be unavoidable during development of the OHV riding area sections. Use of this equipment is temporary and is not anticipated to significantly contribute to the overall air quality in the region. No impact on air quality during the development phase is anticipated.

Air pollution in the form of vehicle emissions will also be unavoidable during operation of the OHV riding area. Based on the location of the OHV riding area away from residential and commercial areas and the likelihood that the OHV riding area is not creating new demand for OHV use, but instead providing a legal alternative of OHV enthusiasts, the operation of the OHV riding area is not expected to negatively impact the overall air quality of the region to a significant extent. Prevailing winds are offshore. No impact on overall air quality is anticipated.

OHV trails and track during use will be maintained with an on-site 2,000-gallon Industrial Water Truck. Dust will be controlled during construction of park and maintained during its operation. No impact on air quality associated with dust is anticipated.

Archaeological and Cultural Resources

Based on the lack of known archaeological sites or of cultural practices or legends associated with the project area, no impacts to archaeological or cultural resources are anticipated by the proposed use.

Economic

The Boat Launch area consists of private and commercial use for thrillcrafts. The OHV park may bring more consumer awareness to this area, resulting in a positive economic impact to these businesses. Developing an authorized OHV riding area near an urban area may contribute to increasing sales of OHVs for personal recreational use, which would positive affect retail OHV merchants; however, this is difficult to quantify. No impact on the economy is anticipated.

Erosion and Soil

Limited and isolated erosion associated with OHV use is a possibility, due to the removal of vegetation and anticipated heavy OHV use in the project area, which is located along the shoreline. However, surface run-off is not anticipated to be an impact to near-shore ocean quality, due to the dry climate, flat terrain, porous soils, and implementation of Best Management Practices. The berms on the makai portion of the proposed riding area will be managed and maintained in a manner that ensures the capture of all potential sediment that is disturbed associated with OHV use. Only isolated impact on the soil of the tracks of the riding area is anticipated, but this will be mitigated through systematic maintenance.

Sound

The sound of operating OHVs may disturb park users and surrounding landowners. Because the proposed OHV park is under the Honolulu Airport Flight path, because it will operate primarily during the weekend (when the surrounding industrial uses are closed or less busy), and because there are no adjacent residences, noise impacts are not anticipated to be significant. As noted in the Sand Island State Park EIS, "power boating and other activities which generate significant noise levels would be compatible" with the noise due to airplanes within the airport flight path,

and the Ewa shoreline, where noise levels from aircraft operations were highest, was identified as "[i]n effect ... a park area zoned for high noise-producing recreation activities." Due to the adjacent industrial uses and location under the flight path of the Honolulu International Airport, no impact is anticipated.

Visual

The OHV riding area will not be visible from any major viewpoints looking towards the ocean. No impact on veiwplane is anticipated.

Shoreline and Beach Access

The OHV riding area will be located a minimum of 40 feet away from the certified shoreline. No infrastructure or construction is planned that would alter or change the shoreline. All public beach access will remain unencumbered and open to the public. No impact on lateral shoreline access is anticipated.

Fuel Management / Fire Protection

No park storage of hazardous materials or flammables will be allowed by park users. OHV activity will not produce a fire hazard to the existing property. No disposal or vehicle oil changes will be permitted at the site. All users are require to have fuel in approved containers and required to be kept in their possession and then vacated from premises upon exiting the park. Simply speaking, this is a "Gas In, Gas Out" policy. Any individual that brings a gas can into the facility will have to remove it upon exiting the facility. No impact associated with fuel use and subsequent fire is anticipated.

Public Health

The islands of Hawaii due to its volcanic origins by nature contain naturally occurring levels of EPA regulated metals and materials such as arsenic and sulfur. No impact on public health is anticipated.

6. Mitigation Measures

While this project is not expected to have any significant negative impacts on the environment, the following items have been identified as possible areas of concern. Planned actions to mitigate possible negative effects are described below.

Dust

OHV trails and track during use will be maintained with an on-site 2,000-gallon Industrial Water Truck. Dust will be controlled via the application of water as necessary during construction of park and maintained during its operation.

Erosion

Limited and isolated erosion associated with OHV use is a possibility, due to the removal of vegetation and anticipated heavy OHV use in the project area, which is located along the shoreline. However, surface run-off is not anticipated to be an impact to near-shore ocean quality, due to the dry climate, flat terrain, porous soils, and implementation of best management

practices. The berms on the makai portion of the proposed riding area will be managed and maintained in a manner that ensures the capture of all potential sediment that is disturbed associated with OHV use. Only isolated impact on the soil of the trails and riding area is anticipated, but this will be mitigated through regular and systematic trial and ridding area maintenance

7. Anticipated Determination

It is not expected that this project will have a significant negative impact on the environment, and a Finding of No Significant Impact is anticipated.

8. Findings and Reasons Supporting Expected Determination

The goal of the proposed action is to create and operate an OHV riding area at Sand Island State Park. The anticipated Finding of No Significant Impact is based on the evaluation of the project in relation to the following criteria identified in the Hawai'i Administrative Rules § 11-200-12:

1) Involves an irrevocable commitment to loss or destruction of any natural or cultural resource.

The proposed action does not involve an irrevocable commitment to loss or destruction of any natural or cultural resource. Instead, the proposed action is planned on an unimproved portion of a State Park, located on an island man-made through dredging deposits. No loss or destruction of natural or cultural resources is anticipated.

2) Curtails the range of beneficial uses of the environment.

The proposed action will not curtail beneficial uses of the environment. Instead, the proposed action will increase the beneficial uses of the environment by putting an unimproved portion of the Sand Island State Park to a public use. The proposed Sand Island OHV Riding Area will provide a new, authorized opportunity for OHV users and families that enjoy operating OHVs. Providing an second authorized riding area on Oahu may reduce the use of OHV's on both unmanaged and unsuitable public and private land.

3) Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders.

The proposed action is consistent with the environmental policies established in Chapter 344, Hawai'i Revised Statutes (HRS). In addition, it could contribute to a reduction in natural resource damages by providing OHV users with an alternative to illegal use of sensitive public and private lands.

4) Substantially affects the economic or social welfare of the community or state.

The proposed action will not adversely affect the economic or social welfare of the community or State. The ecosystem-related goals of the project will directly benefit the economic, cultural, educational, and social interests of the community and the State.

5) Substantially affects public health.

The proposed action is not anticipated to substantially affect public health. The proposed action may have a positive impact on public health by providing education about the safe use of OHVs and by providing new outdoor recreational opportunities for residents.

6) Involves substantial secondary impacts, such as population changes or effects on public facilities.

The proposed action is not anticipated to result in any substantial secondary impacts, such as population changes or effects on public facilities.

7) Involves a substantial degradation of environmental quality.

The proposed action does not involve a substantial degradation of environmental quality. Instead, environmental quality is anticipated to improve with the implementation of the proposed action. The development of a dedicated OHV riding area will positively alter an unimproved portion of State Park that is currently subject to illegal dumping and transient activities and may reduce the volume and impact of illegal OHV use in watershed areas and forest reserves.

8) Is individually limited but cumulatively has considerable effect upon environment or involves a commitment for larger actions.

The proposed action involves development of an OHV riding area, predominantly by placement of fill and movement of soil in an unimproved State Park, built atop a man-made island. There is no discernible cumulative effect on the environment or a commitment for larger action.

9) Substantially affects a rare, threatened or endangered species, or its habitat.

There are no known rare, threatened, or endangered plants or animals within the project area, located in a light industrial area on a man-made island of dredged spoils.

10) Detrimentally affects air or water quality or ambient noise levels.

The proposed action will have no detrimental effects on air quality, water quality, or noise levels. Emissions from the OHV are not anticipated to be higher than in the surrounding light industrial area, berms will be constructed to minimize the possibility of run-off of soil into the surrounding ocean waters, and the ambient noise during operation is not anticipated to be significant in light of the location under the Honolulu Airport flight path.

11) Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

The proposed action is located within the Special Management Area, along the coastline of Sand Island State Park. There is a remote possibility that the OHV riding area could be damaged by a tsunami. However, the value of this riding area as a new recreational opportunity for the residents of the State, at no direct cost to the State, outweighs the potential costs

associated with damage to the riding area by tsunami. The incorporation of best management practices during construction will minimize any impact on coastal waters.

12) Substantially affects scenic vistas and view planes identified in county or state plans or studies.

The proposed action is not anticipated to affect any vistas or view planes identified in county or State plans or studies. For the most part, the OHV riding area is not anticipated to be visible to most residents due to its location within the Sand Island State Park.

13) Requires substantial energy consumption.

The proposed action does not require substantial energy consumption, but instead will consume small amounts of fuel during development of the OHV riding area and through operation of the OHVs.

9. List of Permits Required for Project

Construction of the project required the following:

Permit	Issuing Agency	Comment
Special Management Area minor permit	City and County of Honolulu Department of Planning	The project is located in the Special Management Area. Permit approved December 13, 2006.
State Lease	Department of Land and Natural Resources	A lease is to be executed between Division of State Parks and SIOHVA

10. Environmental Assessment Preparation Information

This Environmental Assessment was prepared collaboratively by the Sand Island OHV Association, staff from the Division of Forestry and Wildlife, Na Ala Hele Trails and Access Program, and the Division of State Parks.

11. References

Aotani & Oka Architects, Inc. and Division of State Parks, Outdoor Recreation and Historic Sites. 1975. Final Environmental Impact Statement for Sand Island State Park.

City and County of Honolulu Department of Planning and Permitting. 2006. SMA Minor Permit No. 2006/SMA-50.

Ecology and Environment, Inc. 2001. Brownsfield Site Assessment Report, Sand Island State Park, Honolulu, Hawaii.

Environet, Inc. 2005. Additional Soil Sampling Investigation. Soil Management Project. Western Investigation Area, Sand Island Honolulu, Hawaii.

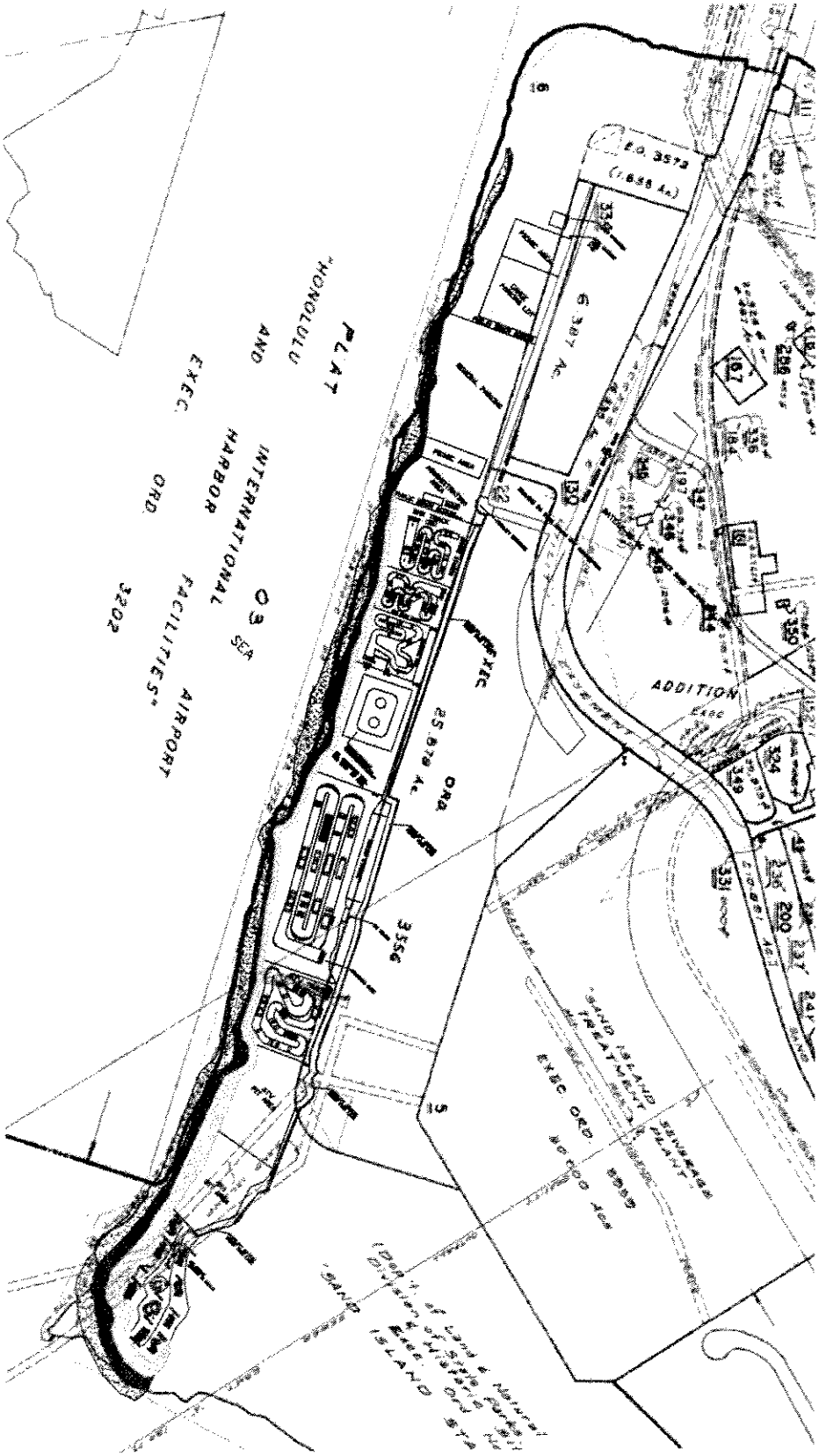
SIOHV Association Inc. 2006. Management Plan, Sand Island Off-Highway Vehicle Park Project.

U.S. Army Engineer District. 1978. Sand Island Shore Protection: Detailed Project Report and Environmental Statement.

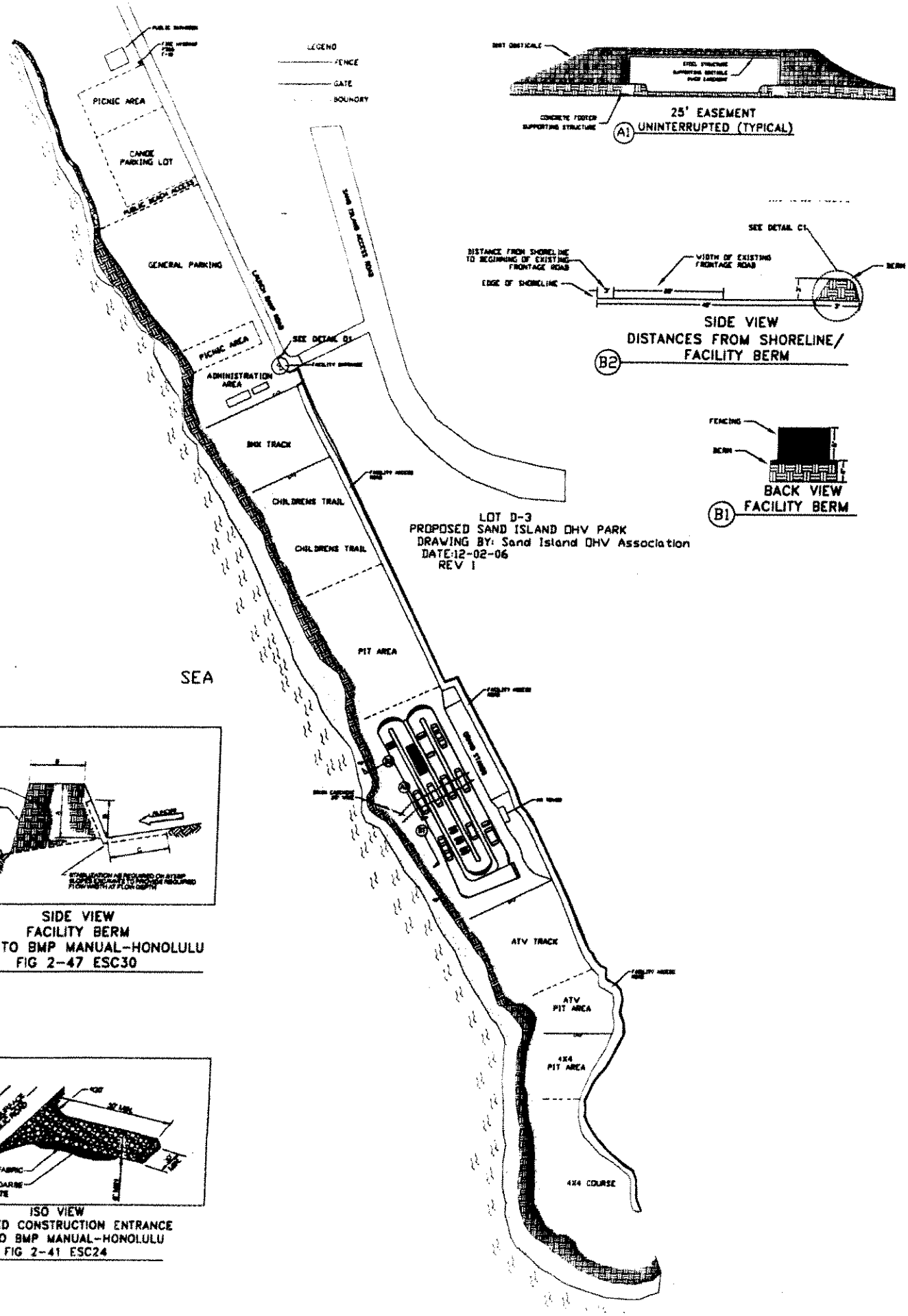
12. Appendices

Appendix A - Map of the Project Area/Sand Island State Park

12. Appendices Appendix A- Map of the Project Area



12. Appendices Appendix A- Map of the Project Area



25' EASEMENT
UNINTERRUPTED (TYPICAL)
A1

SIDE VIEW
DISTANCES FROM SHORELINE/
FACILITY BERM
B2

BACK VIEW
FACILITY BERM
B1

SIDE VIEW
FACILITY BERM
REFER TO BMP MANUAL-HONOLULU
FIG 2-47 ESC30
C1

ISO VIEW
STABALIZED CONSTRUCTION ENTRANCE
REFER TO BMP MANUAL-HONOLULU
FIG 2-41 ESC24
D1

Appendix B - Special Management Area Permit

57507

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-4432 • FAX: (808) 527-6743
DEPT. INTERNET: www.honoluludpp.org • INTERNET: www.honolulu.gov

RECEIVED
DEC 18 A8:04
DEPT OF LAND & NATURAL RESOURCES
STATE OF HAWAII

MUFI HANNEMANN
MAYOR

HENRY ENG, FAICP
DIRECTOR

DAVID K. TANOUE
DEPUTY DIRECTOR

2006/ELOG-2723(cm)
2006/SMA-50

MINOR PERMIT:	**SPECIAL MANAGEMENT AREA (SMA)**
File Number:	2006/SMA-50
Project: (Valuation):	Off-highway Vehicle Motorized Activity course and accessory structures ($97,000)
Landowner:	State of Hawaii
Location:	1640 Sand Island Parkway – Honolulu
Tax Map Key:	1-5-41: 6
Zoning:	P-2 General Preservation District
Applicant:	Department of Land and Natural Resources, State of Hawaii
Date Received:	October 30, 2006
Date Accepted:	December 13, 2006

We have reviewed your proposal and find that it lies within the Special Management Area (SMA) established in Chapter 25, Revised Ordinances of Honolulu (ROH). We find that your proposed development has a stated valuation of less than $125,000 and will have no significant effect on the SMA. Therefore, a Minor Permit is hereby ***APPROVED*** in accordance with the application documents received on October 30, 2006, and subject to the condition listed below:

> If the accepted valuation of the proposed work exceeds $125,000, the project will be returned to the Department of Planning and Permitting for further review under Chapter 25, ROH.

A copy of this approval should accompany your application(s) for construction permits.

cc: Office of Planning (John Nakagawa)

g:\landuse\posseworkingdirectory\carrie\2006\sma\06sma-50

THIS COPY, WHEN SIGNED BELOW, IS NOTIFICATION OF THE ACTION TAKEN.

SIGNATURE	Director TITLE	December 15, 2006 DATE

The above approval does not constitute approval of any other required permits, such as building permits.

Appendix C – Written Comments and DLNR Response

→ Cert C. / incorporate comments.

PHONE (808) 594-1888

FAX (808) 594-1865

STATE OF HAWAI'I
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAI'I 96813

May 29, 2007 **HRD07**

Paul Conry, Administrator
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, Hawai'i 96813

Re: Draft Environmental Assessment for the Sand Island State Park Off Highway Vehicle Riding Area, portion of TMK 1-5-41:6

The Office of Hawaiian Affairs (OHA) is in receipt of the draft Environmental Assessment (EA) for the proposed Sand Island Off Highway Vehicle Riding Area (project area), a pilot project which is a collaboration between the Sand Island Off Highway Vehicle Association and the Department of Land and Natural Resources-Division of Forestry and Wildlife, and State Parks Division.

The project area consists of approximately 32 acres within an unused portion of the 141-acre Sand Island State Park. Based on a review of available information, it is our understanding that the majority of what is now known as Sand Island is man-made created from dredged material.

OHA requests that a maintenance and re-vegetation program be established to mitigate the potential for erosion and dust due to the proposal for removal of existing vegetation and anticipated activities within the project area.

According to our records, the subject parcel is part of the Ceded Lands Inventory, and thus, OHA is entitled to 20% of any revenues generated from current or future uses of the parcel.

Thank you for the opportunity to provide comments on the draft EA. Should you have any questions, please contact Keola Lindsey, Lead Advocate-Culture at (808) 594-1904 or keolal@oha.org.

ʻO wau iho nō,

Clyde W. Nāmuʻo
Administrator

Department of Land and Natural Resources
Division of Forestry and Wildlife
Na Ala Hele Trail and Access Program
Honolulu Administrative Office
www.hawaiitrails.org

June 26, 2007

Clyde Namu'o, Administrator
Office of Hawaiian Affairs
711 Kapiolani Blvd. Suite 500
Honolulu, HI. 96813

Subject: OHA Comments on the Draft Environmental Assessment (DEA) for the Sand Island State Park OHV Riding Area.

Aloha Mr. Namu'o:

Thank you for comments on the DEA for the proposal to utilize a portion of Sand Island State Park for managed OHV use. OHA comments expressed that the majority of land at Sand Island State Park is derived from dredged material and requested that a maintenance and revegetation program be established to mitigate potential erosion and dust. The OHV area will be operated and managed subject to the terms of a lease with the DLNR Division of State Parks, and the lease will include language relating to landscaping with appropriate vegetation.

OHA also indicated that the parcel is listed on the ceded lands Inventory, and that 20% of any revenues generated from this parcel be allocated to OHA. While an entrance fee is being considered for public OHV use, the fee would not constitute revenue to the State, but would be applied toward the cost of the insurance and a percentage of the cost of the maintenance of the trails and tracks of the riding area. The Sand Island Off Highway Vehicle Association is a registered non-profit organization, and a substantial portion of the costs associated with managing the area for OHV's will be derived from federal funds and in-kind services.

Thank you for your comments.

Curt A. Cottrell

NAH Program Manager

C: **Paul Conry, DOFAW**
Dan Quinn, SP
Reid Shimabakuro SIOHVA

JUN 04 2007

>CC

Surfrider Foundation Oahu Chapter

1917 Kuapapa Place
Honolulu, HI 96819
ph: 848-4848

Chairman: Scott Werny
clearwater@hawaii.rr.com

Surfrider Foundation.

CONSERVATION • ACTIVISM • RESEARCH • EDUCATION

State of Hawai'i, Department of Land and Natural Resources
1151 Punchbowl Street, Room 325
Honolulu, Hawai'i 96813.

Subject: Comments on the Sand Island State Park Off Highway Vehicle Riding Area (HRS 343 DEA)

To Whom it May Concern:

The O'ahu Chapter of the Surfrider Foundation supports the proposed Sand Island OHV Area as a constructive means for attempting to reduce OHV riding elsewhere that might otherwise contribute to run-off that harms our reefs and degrades our fragile coastal ecosystems. For these same reasons, we would request that special care be taken with such a large open dirt area, to properly prevent any sediment from entering the adjacent waters.

Further, in accordance with HRS Chapter 115 (Public Access to Coastal and Inland Recreational Areas), the O'ahu Chapter of the Surfrider Foundation strongly requests that a simple, gravel parking area be added to the plans to be located on the makai (south) end of the OHV Area's main road, that is capable of providing beach access for 10-20 recreational users and is adequately equipped with a couple of trash cans. Additionally, if funds are available, a simple showering facility might also be located at this area. It is important to provide adequate public beach access as we develop any areas along our oceanfront.

Mahalo for your kokua.

Sincerely,

Scott H. Werny
Chairman, Surfrider Foundation Oahu Chapter

Surfrider's O'ahu Chapter has hundreds of members on O'ahu, and is celebrating 10 years of activism. The O'ahu Chapter's mission is to improve ocean water and beach quality, to keep and open access to the ocean for all to enjoy, and to assure that all development on our island is responsible by having minimal impact on our coastal environment. The chapter is one of 80 Surfrider Foundation chapters across the United States and Puerto Rico, with international affiliates in Australia, Europe, Japan and Brazil. Founded in 1984 by a handful of visionary surfers, the Surfrider Foundation now maintains over 55,000 members. For more information, go to: www.surfrider.org/oahu/ or call 531-SURF.

Department of Land and Natural Resources
Division of Forestry and Wildlife
Na Ala Hele Trail and Access Program
Honolulu Administrative Office
www.hawaiitrails.org

June 26, 2007

Mr. Scott Werny, Chairman,
Surfrider Foundation, Oahu Chapter (SFOC)
1917 Kuapapa Place
Honolulu, HI. 96819

SFOC Comments on the Draft Environmental Assessment (DEA) for the Sand Island State Park OHV Riding Area.

Aloha Mr. Werny:

Thank you for SFOC support and comments on the DEA for the proposal to utilize a portion of Sand Island State Park for managed OHV use. Your comments expressed support for the development of this portion of Sand Island State Park for authorized OHV use, and requested that additional parking makai of the riding area be provided to facilitate public coastal access. In addition, SFOC asked that if funding allowed, that a simple shower be considered to service the public.

The proposed parking area is currently located on the Ewa side (west) of the existing earth berm and extends along the coastline to the area currently occupied by outrigger canoes and the DLNR Division of Boating and Ocean Recreation restrooms. The existing concrete barriers along the entrance/access road will be relocated to allow for vehicular access to this area. This will in effect provide additional parking that is much closer to the ocean in this location. This parking will service OHV users, and it is anticipated that this additional parking will also benefit fishermen and the several canoe clubs that seasonally train in the waters just offshore from the site. On the makai (south) side of the berm, along the wide, flat, perimeter shoreline frontage, the intent is to establish a perimeter vehicular access route for park management and maintenance (servicing the landscaping, passage for the water truck for dust abatement, trail and track management activities, and to provide assured passage for emergency vehicles.)

The OHV area will be operated and managed subject to the term of a lease with the DLNR Division of State Parks, therefore minimal infrastructure is planned, since if the lease is terminated prematurely or not renewed, the terms will include that infrastructure be removed.
However, if this pilot project is successful, and no other public uses are planned for this section of Sand Island State Park, then facilities such as showers may be considered if a longer -term lease is consummated for OHV use.

Again, thank you for your support and comments.

Curt A. Cottrell

NAH Program Manager

C: **Paul Conry, DOFAW**
Dan Quinn, SP
Reid Shimabakuro SIOHVA

JUN 15 2007

→ CC - appropriate

LINDA LINGLE
GOVERNOR OF HAWAI'I

LAURENCE K. LAU
INTERIM DIRECTOR

STATE OF HAWAI'I
DEPARTMENT OF HEALTH
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
235 SOUTH BERETANIA STREET
LEIOPAPA A KAMEHAMEHA, SUITE 702
HONOLULU, HAWAI'I 96813
Telephone (808) 586-4185
Facsimile (808) 586-4186
Electronic Mail: OEQC@doh.hawaii.gov

June 14, 2007

Mr. Paul Conry
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, Hawai'i 96813
Attention: Curt A. Cottrell, Trail and Access Program Manager

Dear Mr. Conry:

Subject: Draft Environmental Assessment (DEA) for the Sand Island State Park Off Highway Vehicle Riding Area

Our office has reviewed the DEA for the project noted above. We have the following comments:

Page 6, Operation, paragraph 4 on page 6,
lines 1-4: The noise which emanates from overhead flights is of an intermittent nature. Please address potential noise impacts from the use of off road vehicles to users of the park who are involved in passive recreational activities.
lines 4-5: Will the noise impact to other park users be muffled when the wind shifts direction due to local atmospheric conditions?

Page 9, Fauna, paragraph 2 on page 9: Please include documentation of the site survey by the DOFAW biologist in the Final Environmental Assessment (FEA).

Page 9, Archaeological Resources, paragraph 1: The current boundaries of Sand Island include historic islands that were extant in Honolulu Harbor before Sand Island was formed from fill material. Please provide information delineating the boundaries of these islands within current Sand Island. Please discuss any potential cultural practices such as fishing associated with these islands.

Page 11, Drainage: Please include a detailed drainage plan as an appendix to the FEA.

Page 11-12, Air Quality: Please address potential impacts to passive users, who frequent adjacent areas of Sand Island State Park, from OHV fumes.

Page 12, Archaeological and Cultural Resources: Please refer to our comment above for page 9, Archaeological Resources, paragraph 1. Please address any traditional cultural practices associated with Kaholoa Island, such as fishing.

Page 12, Economic, line 3: Please drop the word "in."

Page 12, Sound: Please refer to the comment above for page 6, Operation, paragraph 4 on page 6, lines 1-4.

Page 13, Visual: Please include photos of the current views to and from the project site and photo-simulations after the Off Highway Vehicle Park is completed.

Page 15, Findings and Reasons Supporting Expected Determination, Item #10 on page 15, Detrimentally Affects Air or Water Quality or Ambient Noise Levels: Please refer to the comment above for page 6, Operation, paragraph 4 on page 6, lines 1-4.

Page 17, Appendix A – Map of the Project Area: Please provide a larger version of the site map which is more readable. Please also include a larger site map which delineates the other elements of Sand Island State Park.

Should you have any questions, please call Leslie Segundo at 586-4185.

Sincerely,

Laurence K. Lau
Deputy Director for Environmental Health

Department of Land and Natural Resources
Division of Forestry and Wildlife
Na Ala Hele Trail and Access Program
Honolulu Administrative Office
www.hawaiitrails.org

June 26, 2007

Mr. Laurence K. Lau
Deputy Director for Environmental Health
Office of Environmental Quality Control (OEQC)
235 South Beretania Street
Leiopapa Kamehameha bldg. Suite 702
Honolulu, HI. 96813

Attention: Mr. Leslie Segundo

OEQC Comments on the Draft Environmental Assessment (DEA) for the Sand Island State Park OHV Riding Area.

Thank you for the OEQC June 14th comments on the DEA for the proposal to utilize a 30 acre portion of Sand Island State Park for managed OHV use. While the comments were submitted after the 30 day deadline for comments, DLNR appreciates OEQC review and offers the following response.

There were several comments submitted by OEQC that are categorized as follows:

1. Impacts of sound on passive recreational users of the Sand Island State Park
2. Documentation of site survey by Wildlife Biologist
3. Archaeological Resources (relating to historic island extant in Honolulu Harbor prior to the creation of Sand Island from dredged fill material - information related to historic cultural fishing practices)
4. Drainage plan
5. Air quality impacts to other passive park users
6. Photo simulation of proposed trails and tracks within the riding area
7. Larger map of proposed OHV riding area within the context of the existing extant of Sand Island State Park (SISP)

1. Sound

The shoreline in this area forms a curving lateral angle in southwesterly/northeasterly aspect. The proposed OHV riding trails and tracks are to be situated in the southwesterly portion of SISP that is separated from the section of the park managed for passive recreation by the seldom used and unmanaged baseball playing fields (a former shooting range) and the existing City and County of Honolulu sewage treatment plant. This open space and the infrastructure related to the sewage treatment facility creates a physical buffer between the proposed riding area and the portion of SISP managed for passive recreation. In addition, landscaping and modification of existing earthen berms

by the OHV SISP lessee will contribute to the isolation of sound within the proposed 30 acre riding area and reduce the amount of sound that passive users may experience.

SISP is visited in low numbers and sporadically during the week by passive park users, and the shoreline is occasionally utilized by fishermen. A habitual fisherman did contact Na Ala Hele staff via telephone with the concern that the OHV area would inadvertently restrict lateral shoreline access, and he was reassured that lateral shoreline access would continue in its current condition and that increased public parking would be created closer to the shoreline – facilitating access for fishers. The individual was not concerned about the associated sound of the OHV users.

It is anticipated that on weekends, when there is greater magnitude associated with both SISP passive recreational use and OHV use, that passive recreational users may periodically be exposed to the sound associated with OHV use. Depending on fluctuating trade wind conditions, ancillary heavy industrial uses, and flight patterns associated with current use of airspace, the OHV contribution to overall sound should not be detrimental to passive SISP use. The SISP is surrounded by heavy industrial activity, and directly under the flight path of the Honolulu International Airport, and as such, SISP users conduct passive recreational use in a predominately urban setting with a fluctuating degree of ancillary sound.

2. Reconnaissance by Wildlife Biologist

The Final EA will include the date of reconnaissance and subsequent findings (if different from the DEA) by a Wildlife Biologist.

3. Archaeological Resources (relating to historic island extant in Honolulu Harbor prior to the creation of Sand Island from fill material - information related to historic cultural fishing practices)

The Final Environmental Impact Statement for Sand Island State Park completed in 1975 did not address this topic, presumably since the location had been so significantly altered prior to the creation of SISP.

(The following is from the DOT website about the history of Honolulu Harbor)

"The discovery of petroleum in 1859 was almost a death blow to the whaling industry. The outbreak of the Civil War caused even further withdrawal of many whalers. Fortunately, the "War Between the States" over-compensated for the loss of whalers by providing an impetus for one of Hawaii's most dynamic agricultural industries - sugar. Hawaiian sugar became a profitable export when the southern states' supply was cut off and prices rose. Hawaii's sugar exports multiplied many times during the course of this war. The frenzied activity in Honolulu Harbor and along the waterfront included important physical improvements among the many sugar ship sailings. The harbor light was built in 1868 and lit for the first time on August 8, 1869. By 1874, a long harbor seawall was in place, lined with wharves and warehouses. ***The harbor had been***

deepened by dredging and the dredged material deposited on the shallow off-shore reef to begin the reclamation of land now known as Sand Island. Initially known as Quarantine Island and used to isolate ships with cases of contagious diseases on-board, Sand Island now houses the State's major container terminals."

Prior to the dredging, it is presumable that the existing Mokauea fishery provided a substantial source of food for traditional and cultural fishers. While recreational fishing continues today along the artificial and modified shoreline, the dredging and subsequent use of the off-shore waters for harbor activity has significantly changed the area from the mid 1800's condition. The historical island, known as Quarantine Island, was located considerably mauka of the current shoreline and is now completely subsumed by heavy industrial infrastructure and related activity. The proposed additional recreational use of SISP by OHVs does not affect or have a nexus to these historic conditions and the past 100 years of extreme physical alteration of the coastline in this location.

4. Drainage plan

As described in the DEA, the fill of the island is classified as Ewa Silty Clay Loam, and is moderately shallow (20 – 50 inches deep). Runoff is very slow and permeability is moderate with a slight erosion potential. While a drainage easement exists on the proposed site, and will not be blocked but maintained unencumbered for drainage, there is no need to create a detailed drainage plan. The earthen berms are to remain intact, and other than occasional spraying of the trails and tracks for potential dust abatement, and occasional irrigation of proposed dry land native plants on the berms, there is no net increase in runoff associated with the creation of the riding trails and tracks.

As such, due to the construction plans and incorporation of BMPs and the soils in the area, no significant changes in the normal runoff or percolation patterns are anticipated as a result of this project. No impact or change to current drainage is anticipated. Therefore, no detailed drainage schematic is prepared.

5. Air quality impacts to other passive park users

As sated in response # 1, there are buffers of open space and the Honolulu City and County Sewage Treatment Plant between the passive SISP users and the OHV use. Tradewinds mitigate some of the air quality issues associated with the fumes of the sewage treatment plant and adjacent heavy industrial activity, and therefore should also affect the additional exhaust associated with OHV use. During climatic conditions associated with Kona winds (southerly or southwesterly), OHV exhaust, in addition to the occasional fumes associated with the operation of the sewage treatment facility, may be noticeable by passive SISP users. However, impact is not anticipated to be significant based on the anticipated numbers of users.

6. Photo simulation of riding trails within the riding area

Staff assumption is that a photo simulation was requested to address potential visual impacts in relation to the adjacent heavy-industrial users, the adjacent sewage

treatment plant, and to SISP passive recreational users. As described in the DEA, there are currently existing earthen berms in place, created by the dumping of other fill material since the 1940's. OHV use will not exceed the elevation of the earthen berms, so the need to produce a photo simulation of the trail and tracks within this area is not warranted. There are existing trails in the project area, primarily used and created by a fluctuating population of indigents that illegally reside in the area, and it is anticipated that these trails will be modified while new trails and tracks are to be created to accommodate OHV use.

7. Larger map of OHV trail riding area and the passive recreational portion of SISP

A larger scale map of the proposed riding area within the context of the entire SISP will be included in the FEA.

Thank you for your comments.

Curt A. Cottrell

NAH Program Manager

C: Paul Conry, DOFAW
Dan Quinn, SP
Reid Shimabakuro SIOHVA