

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 11, 2014

Jessica Wooley, Director
Office of Environmental Quality Control
Department of Health
State of Hawaii
235 South Beretania Street, Room 702
Honolulu, Hawaii 96813

FILE COPY

JUL 23 2014

570614
14 JUL 11 P3:46
OFFICE OF ENVIRONMENTAL
QUALITY CONTROL
RECEIVED

Dear Ms. Wooley:

Subject: Waikiki War Memorial Complex

With this letter, the City and County of Honolulu, Department of Design and Construction, hereby transmits the final environmental assessment and environmental impact statement preparation notice (FEA-EISPN) for the Waikiki War Memorial Complex situated at TMKs (1) 3-1-031:003, 009, and 010, in the Honolulu District on the island of Oahu for publication in the next available edition of the Environmental Notice.

We understand that publication of the FEA-EISPN in the Environmental Notice will initiate a 30-day public consultation period for parties to comment on the action and to request to become consulted parties in the preparation of the draft environmental impact statement (EIS).

Enclosed is a completed OEQC Publication Form, two copies of the FEA-EISPN, an Adobe Acrobat PDF file of the same, and an electronic copy of the publication form in MS Word. Simultaneous with this letter, we have submitted the summary of the action in a text file by electronic mail to your office.

We are copying the Office of the Mayor to inform them that a subsequent draft EIS will be prepared at the conclusion of the public consultation period.

Should there are any questions, please contact Clifford Lau at 768-8478.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

Enclosures
cc: Office of the Mayor
WCP Inc.

AGENCY ACTIONS
SECTION 343-5(B), HRS
PUBLICATION FORM (FEBRUARY 2013 REVISION)

Project Name: Waikiki War Memorial Complex
Island: Oahu
District: Honolulu
TMK: (1) 3-1-031:003, 009, and 010
Permits: Section 404, Department of the Army Permit; Section 401, Water Quality Certification; Coastal Zone Consistency Review; HRS Chapter 6E Historic Preservation review and Section 106 Consultation; Conservation District Use Permit; National Pollution Discharge Elimination System Permit; Shoreline Setback Variance; Special Management Area Permit (Major); Diamond Head Special District Permit (Minor), Zoning Waiver; Building Permit; Demolition Permit; Grading Permit

Proposing/Determination Agency: City and County of Honolulu
Department of Design and Construction
650 South King Street, 11th floor
Honolulu, Hawai'i 96813
Clifford Lau, Facilities Branch Chief
Tel: (808) 768-8478

Accepting Authority: Mayor of the City and County of Honolulu
Honolulu Hale
530 South King Street, Room 306
Honolulu, Hawai'i 96813

Consultant: WCP, Inc.
99-061 Koaha Way, Suite #208
Aiea, Hawaii 96701
Celia Shen (808) 380-3851 or
Richard Stook (808) 242-0218

Status (check one only):

- DEA-AFNSI** Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of DEA, a completed OEQC publication form, along with an electronic word processing summary and a PDF copy (you may send both summary and PDF to oeqchawaii@doh.hawaii.gov); a 30-day comment period ensues upon publication in the periodic bulletin.
- FEA-FONSI** Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of the FEA, an OEQC publication form, along with an electronic word processing summary and a PDF copy (send both summary and PDF to oeqchawaii@doh.hawaii.gov); no comment period ensues upon publication in the periodic bulletin.
- FEA-EISPN** Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of the FEA, an OEQC publication form, along with an electronic word processing summary and PDF copy (you may send both summary and PDF to oeqchawaii@doh.hawaii.gov); a 30-day consultation period ensues upon publication in the periodic bulletin.
- Act 172-12 EISPN** Submit the proposing agency notice of determination on agency letterhead, an OEQC publication form, and an electronic word processing summary (you may send the summary to oeqchawaii@doh.hawaii.gov). NO environmental assessment is required and a 30-day consultation period upon publication in the periodic bulletin.
- DEIS** The proposing agency simultaneously transmits to both the OEQC and the accepting authority, a hard copy of the DEIS, a completed OEQC publication form, a distribution list, along with an electronic word processing summary and PDF copy of the DEIS (you may send both the summary and PDF to oeqchawaii@doh.hawaii.gov); a 45-day comment period ensues upon publication in the periodic bulletin.

OFFICE OF ENVIRONMENTAL QUALITY CONTROL

14 JUL 11 P 3:46

OFFICE OF ENVIRONMENTAL QUALITY CONTROL

___FEIS

The proposing agency simultaneously transmits to both the OEQC and the accepting authority, a hard copy of the FEIS, a completed OEQC publication form, a distribution list, along with an electronic word processing summary and PDF copy of the FEIS (you may send both the summary and PDF to oeqchawaii@doh.hawaii.gov); no comment period ensues upon publication in the periodic bulletin.

___ Section 11-200-23
Determination

The accepting authority simultaneously transmits its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS to both OEQC and the proposing agency. No comment period ensues upon publication in the periodic bulletin.

___Section 11-200-27
Determination

The accepting authority simultaneously transmits its notice to both the proposing agency and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is not required. No EA is required and no comment period ensues upon publication in the periodic bulletin.

___Withdrawal (explain)

Summary (Provide proposed action and purpose/need in less than 200 words. Please keep the summary brief and on this one page):

The City and County of Honolulu, Department of Design and Construction, is proposing improvements to the Waikiki War Memorial Complex area of Kapiolani Regional Park. The Proposed Action includes the creation of a new beach situated at the present site of the Natatorium. The new beach will be fronted by a replica World War I memorial arch in alignment with the existing Roll of Honor plaque and hau tree arbor. The Proposed Action also involves additional proposed improvements within the park area including constructing a new bathhouse, removal of an internal roadway, and construction of a consolidated parking lot.

The purpose of the proposed project is to improve the Waikiki War Memorial Complex area of Kapiolani Regional Park by renewing the memorial to World War I veterans, and to fully reopen this portion of Kapiolani Regional Park to the public. In addition to public access, the proposed project addresses the need for determining the disposition of the Natatorium in order to remedy the visual/aesthetic blight and the public health and safety risks posed by the deteriorating structure.

**FINAL ENVIRONMENTAL ASSESSMENT-ENVIRONMENTAL IMPACT
STATEMENT PREPARATION NOTICE
(FEA-EISPN)**

FOR THE

**WAIKĪKĪ WAR MEMORIAL COMPLEX
HONOLULU, O'AHU ISLAND, HAWAI'I**

July 2014

**The City and County of Honolulu
Department of Design and Construction**

**FINAL ENVIRONMENTAL ASSESSMENT-ENVIRONMENTAL IMPACT
STATEMENT PREPARATION NOTICE
(FEA-EISPN)**

FOR THE

**WAIKĪKĪ WAR MEMORIAL COMPLEX
HONOLULU, O'AHU ISLAND, HAWAI'I**

July 2014

Prepared for:

The City and County of Honolulu
Department of Design and Construction

Prepared by:

WCP Inc.
'Aiea, Hawai'i

(Page Intentionally Left Blank)

TABLE OF CONTENTS

1. INTRODUCTION..... 1

1.1. PROJECT SUMMARY 1

1.2. SCOPE AND AUTHORITY 3

2. PROJECT DESCRIPTION 4

2.1. PROPOSED PROJECT 4

2.2. PURPOSE AND NEED FOR THE PROPOSED PROJECT 4

 2.2.1 Purpose..... 4

 2.2.2 Need..... 4

2.3. PROJECT LOCATION AND SITE 4

2.4. PROJECT HISTORY AND BACKGROUND 6

 2.4.1 Development of the Natatorium..... 6

 2.4.2 Chronological Summary of the Natatorium’s Structural/Maintenance Issues and Demolition and Restoration Efforts..... 7

 2.4.3 Alternative Use Study and Task Force 10

 2.4.4 Current Conditions 11

2.5. PROPOSED ACTION AND ALTERNATIVES..... 11

 2.5.1 Proposed Action: War Memorial Beach..... 11

 2.5.2 Alternative 1: Reconstruction and Restoration of the Natatorium 14

 2.5.3 Alternative 2: No Action Alternative 15

2.6. TIME FRAME AND PROPOSED SCHEDULE 16

2.7. ESTIMATED PROJECT COST 16

3. SUMMARY OF AFFECTED ENVIRONMENT AND POTENTIAL ENVIRONMENTAL CONSEQUENCES 17

3.1. NATURAL ENVIRONMENT 17

 3.1.1 Geology and Hydrology..... 17

 3.1.2 Water Quality..... 18

 3.1.3 Biological Resources 18

 3.1.4 Air Quality 19

 3.1.5 Climate and Natural Hazards..... 20

3.2. MAN-MADE ENVIRONMENT 21

 3.2.1 Land Use and Tenure..... 21

 3.2.2 Infrastructure and Public Services 21

 3.2.3 Public Safety and Health 21

 3.2.4 Visual and Aesthetic Resources 22

 3.2.5 Recreational Resources 22

 3.2.6 Traffic and Circulation..... 23

 3.2.7 Noise Environment..... 23

 3.2.8 Archaeological, Historic, and Cultural Resources..... 23

 3.2.9 Socioeconomic Setting..... 24

4. ANTICIPATED DETERMINATION..... 25

5. PUBLIC AND AGENCY INVOLVEMENT 26

5.1. TASK FORCE MEETINGS 26

5.2. EARLY CONSULTATION MEETING WITH PERMITTING AGENCIES 27

5.3. OUTREACH INTERVIEWS WITH KEY STAKEHOLDER GROUPS 28

5.4. EARLY CONSULTATION 28

6. LIST OF PERMITS AND APPROVALS 30

7. REFERENCES 31

PHOTOGRAPHS 35

FIGURES..... 45

 FIGURE 1. PROJECT LOCATION

 FIGURE 2. TMK MAP

 FIGURE 3. PROJECT SITE

 FIGURE 4. PROPOSED ACTION, OPTION 1

 FIGURE 5. PROPOSE ACTION, OPTION 2

 FIGURE 6. PROPOSED ACTION, OPTION 3

 FIGURE 7. NEW EWA SEAWALL SECTION

 FIGURE 8. NEW DIAMOND HEAD RUBBLEMOUND SECTION

 FIGURE 9. RENDERING OF THE REPLICA MEMORIAL ARCH

 FIGURE 10: ALTERNATIVE 1

APPENDIX A: Early Consultation Distribution List and Comment Letters

ACRONYMS

DDC	Department of Design and Construction, City and County of Honolulu
DLNR	Department of Land and Natural Resources, State of Hawai‘i
DOH	Department of Health, State of Hawai‘i
DPR	Department of Parks and Recreation, City and County of Honolulu
EIS	Environmental Impact Statement
EISPN	Environmental Impact Statement Preparation Notice
FEA	Final Environmental Assessment
FEMA	Federal Emergency Management Agency
HAR	Hawai‘i Administrative Rules
HCR	House Concurrent Resolution
HEPA	Hawai‘i Environmental Policy Act
HRS	Hawai‘i Revised Statutes
MSL	mean sea level
SOEST	School of Ocean and Earth Science and Technology, University of Hawai‘i
TMK	tax map key
USACE	United States Army Corps of Engineers

(Page Intentionally Left Blank)

1. INTRODUCTION

The City and County of Honolulu, Department of Design and Construction (DDC) is proposing improvements to the Waikīkī War Memorial Complex. The Waikīkī War Memorial Complex consists of the Waikīkī War Memorial Natatorium, the adjacent memorial park and Kaimana Beach Park. The Natatorium was constructed in 1927 as a monument to Hawaii's men and women that served during World War I. The facility consists of a saltwater swimming pool, bleachers, restrooms, and an area currently used as office space. It is listed on both the National and Hawai'i Registers of Historic Places, and in May 2014 the National Trust for Historic Preservation designated the Waikīkī War Memorial Natatorium as a National Treasure. The Natatorium's pool and bleachers have been closed to the public since 1979; however, the restrooms facilities are open to the public and the office space under the bleachers is occupied by the Ocean Safety and Lifeguard Services Division of the City and County of Honolulu's Department of Emergency Services.

1.1. Project Summary

Project Name:	Waikīkī War Memorial Complex
Proposed Project:	Improve Kapi'olani Regional Park by determining the final disposition of the Natatorium, restoring full public access to all areas of the park, and ensuring the project site continues to serve as a World War I memorial.
Proposed Action:	The Proposed Action is the creation of a new beach situated at the present site of the Natatorium. The new beach will be fronted by a replica World War I memorial arch in alignment with the existing Roll of Honor plaque and hau tree arbor. The Proposed Action also involves additional proposed improvements within the park area including constructing a new bathhouse, removal of an internal roadway, and construction of a consolidated parking lot.
Alternatives to be Evaluated in EIS:	Preferred Alternative: Proposed Action Alternative 1: Reconstruction and restoration of the Natatorium Alternative 2: No Action
Proposing Agency:	City and County of Honolulu Department of Design and Construction 650 South King Street, 11th floor Honolulu, Hawai'i 96813
Accepting Authority:	Mayor of the City and County of Honolulu Honolulu Hale 530 South King Street, Room 306 Honolulu, Hawai'i 96813

FEA/EISPN Preparer: WCP Inc.
99-061 Koaha Way, Suite 208
‘Aiea, Hawai‘i 96701

Project Location: 2815 Kalākaua Avenue
Honolulu, Hawai‘i 96815

TMKs and Land Ownership: (1) 3-1-031:003 (State of Hawai‘i)
(1) 3-1-031:009 (City and County of Honolulu)
(1) 3-1-031:010 (held in trust by the State of Hawai‘i)

Project Area: Total Acreage: 6.74
(Onshore Acreage: 3.98; Offshore Acreage: 2.76)

Property Administrator: City and County of Honolulu

Existing Land Use: Public recreational park and beach. Facilities include the Waikīkī War Memorial Natatorium which provides public restrooms and office space for the Ocean Safety & Lifeguard Services.

State Land Use Classification: U - Urban

PUC Development Plan: Major Parks and Open Space

County Zoning Designation: P-2 - General Preservation

Special Management Area: Yes

Special Design District: Diamond Head Special District

1.2. Scope and Authority

This Final Environmental Assessment-Environmental Impact Statement Preparation Notice (FEA-EISPN) has been prepared in accordance with the Hawai‘i Environmental Policy Act (HEPA), as codified in Hawai‘i Revised Statutes (HRS) Chapter 343 and implemented by Hawai‘i Administrative Rules (HAR) Title 11, Chapter 200. The use of State or County lands or funds, proposed use within the shoreline area, and proposed use of a registered historic site triggers HEPA for the proposed project. The filing of this FEA-EISPN initiates the HEPA process.

This FEA-EISPN is not intended to serve as a comprehensive environmental disclosure document. Its purpose is to inform interested parties of the intent to prepare an EIS due to the level of anticipated impacts that could potentially result from implementing the proposed project and to gather input from pertinent agencies, stakeholders, and the public. Relevant information gathered through the EISPN process will assist in defining the specific issues and level of analysis to be addressed in the EIS. The EIS will examine and evaluate all proposed alternatives in relation to one another and the surrounding environment to determine potential direct, indirect, and cumulative impacts upon the natural and man-made environment.

2. PROJECT DESCRIPTION

2.1. Proposed Project

The proposed project is to improve the Kapi‘olani Regional Park by determining the final disposition of the Natatorium, restoring full public access to all areas of the park, and ensuring the project site continues to serve as a World War I memorial.

2.2. Purpose and Need for the Proposed Project

2.2.1 Purpose

The purpose of the project is to resolve the future of the Natatorium in order to remedy the visual/aesthetic blight and the health and safety risks posed by the deteriorated structure, renew the memorial to World War I veterans, and to re-establish full public access to this portion of Kapi‘olani Regional Park.

2.2.2 Need

The project is needed because the Natatorium poses a health and safety risk to area users due to the swim basin’s water quality and the facility’s deteriorated structural condition. Due to poor design and inadequate construction techniques, maintenance and structural issues became a concern soon after the Natatorium was completed in 1927. Insufficient pool water circulation led to water quality issues, including an accumulation of muck at the pool bottom, temporarily closing the Natatorium in 1963 when the State Department of Health (DOH) declared the pool unfit for swimming. By 1979, structural concerns and continued water quality issues led to a closure of the Natatorium. Landside restoration efforts completed in 2000, allowed reopening of the public restrooms/showers and the office/storage space beneath the bleachers. The pool and bleacher structure however, has remained closed for more than 30 years, prohibiting public access to this area of the Waikīkī shoreline.

Over the years, both State and City funds have been allocated to determine feasible plans and to initiate both demolition and restoration at different times. Litigation by public advocacy groups has halted both demolition and restoration attempts. Due to the inability to reach a consensus on the fate of the Natatorium, water quality and structural issues have gone unaddressed and the facility continues to degrade. The Natatorium’s current condition is such that the City must periodically undertake emergency actions to mitigate imminently hazardous public safety conditions posed by the deteriorated structure. Further, in its current state, the Natatorium reflects poorly on the City in allowing a dilapidated structure and eyesore along the world-famous Waikīkī shoreline.

2.3 Project Location and Site

The Waikīkī War Memorial Complex (hereafter referred to as the project site) is located on Oahu’s southern shoreline, roughly 1 mile south/southeast of the heart of Waikīkī. The 6.74-acre project site is bounded by the Waikīkī Aquarium to the north, Kalākaua Avenue to the east, the New Otani Kaimana Beach Hotel to the south, and the Pacific Ocean to the west. The project site includes Kaimana Beach Park (also known as Sans Souci Beach), the Natatorium and the memorial park. The project site and surrounding environs is shown in Figure 1.

The project site is dominated by the Natatorium, one of the first salt water pools in the nation. The 100-meter long ocean-fed swimming pool with surrounding pool decks and adjacent bleacher structure were constructed in 1927 of reinforced concrete placed on coral reef (DLNR 1990). The Natatorium was placed on both the State and National Registers of Historic Places in 1980. The following excerpt from the National Register nomination form describes the physical appearance of the Natatorium.

The pool is surrounded on four sides by a twenty-foot wide deck which is enclosed on the three ocean sides by a three-foot high wall. On the fourth, mauka (mountain) side, concrete bleachers rise thirteen levels in height and provide seating for approximately 2,500 people. The bleachers are divided into two parts, each with four sections, with a central entry space separating the two parts.

The Beaux-Arts inspired main entry, with its triumphal arch flanked by two lesser round arches, is the major architectural feature of the Natatorium. A pair of ionic pilasters support the triumphal arch's entablature which has the words, "The War Memorial" inscribed in its frieze. An elaborate sculpture rises from the entablature. It consists of a garlanded base with an American eagle perched at each corner and the Hawaiian motto and seal in the center. The triumphal arch itself, has a paneled ceiling decorated with hexagonal floral designs. Flanking the triumphal arch, and above the two lower arches, is a medallion with floral patterns and a woman's face in the center relief. The ocean and mountain sides of the entry are similar.

To either side of the main entrance, the bleacher's rear walls extend approximately 100 feet. Locker rooms are below the bleachers and inset behind the centered round arched arcades of seven bays each. Round arched windows, which correspond to the arcade openings, provide the locker rooms with ventilation and illumination. A pair of simple pilasters flank the arcade and support large concrete urns, which project above the bleacher walls and demarcate the end sections of each bleacher. A flagpole with a ball finial is located above the second and sixth openings of each arcade. The bays on either side of the arcade contain office and restroom spaces and are distinguished by rectangular windows with grills.

A ramp leads to the main entry; to either side of this ramp are a volleyball and basketball court. A concrete wall with an incised diamond pattern, encloses these courts. The end walls are stepped, and two bays long at the main entry end and three bays long at the other end. The front walls are five bays long and a tapered concrete column, which originally supported a light globe, is at each pier. At the corners of the entry ramp, these columns are fluted metal and support spotlights which illuminate the triumphal arch entry. A hau arbor supported by pipes is adjacent to the front walls.

In the years since this description was written, the ramp leading to the triple arch entry and the court fronting the Ewa arched arcade have been converted to parking. Also, in 2000 a partial restoration of the Natatorium was completed. During this "land-side" restoration, the public

restroom/shower area beneath the bleachers was reconfigured and portions converted to office and operations space for the City and County of Honolulu's Ocean Safety and Lifeguard Services Division. The pool and bleachers remain closed to the public.

Other park facilities at the project site include outdoor showers, benches, picnic tables and parking for beach and park users. Figure 3 depicts existing conditions at the project site. Located on the lawn towards Kalākaua Avenue, in alignment with the Natatorium's triple-arch entry, is a stone-mounted plaque. Unveiled in 1931, this "Roll of Honor" memorial names 101 soldiers from Hawai'i who died while in service with the United States or Britain during World War I. Surrounding grounds are alternately shaded (several 'exceptional' trees are protected under state law and county ordinance) or open grass parkland.

A road bisects the project site, winding in from Kalākaua Avenue at the east/southeast corner with a dead end near the Waikiki Aquarium at the site's north boundary. Parallel parking along both sides of the road is supplemented by additional parking on the sloped access ramp leading to the triple-arch entry, and a parking lot fronting the Ewa half of the Natatorium's façade.

Kaimana Beach begins at the Natatorium's Diamond Head wall and extends south to adjacent property. Kaimana Beach was created by ocean conditions that generally push sand northward against the Natatorium structure, creating a sandy beach that is more than 150 feet wide. A nearby offshore channel is used by swimmers and surfers seeking a way through the characteristic shallow reef flats that dominate much of the Waikiki near-shore environs. The Waikiki-Diamond Head Shoreline Fisheries Management Area is offshore and extends from the Natatorium's Ewa wall south to the Diamond Head lighthouse. This regulated fishing area begins from the high water mark along Kaimana Beach seaward 500 yards, or to the edge of a fringing reef if one occurs beyond 500 yards. The beach area is managed by the City and County as a beach park, and the offshore area is managed under State Department of Land and Natural Resources' Division of Aquatic Resources.

The shoreline north of the Natatorium parallels an 800-foot long seawall that protects Waikiki Aquarium and the adjacent park lands; this stretch of narrow, sandy beach is submerged at high tide (USACE 2008). Continuing north of the seawall end, the sandy beach widens until it reaches the Kapahulu groin (a seawall constructed perpendicular to Kalākaua Avenue where it intersects Kapahulu Avenue). The area from the high water mark along this stretch of beach to 500 yards offshore (approximately to the seaward edge of the fringing reef) constitutes the Waikiki Marine Life Conservation District. Its southern boundary is the Ewa wall of the Natatorium.

2.4. Project History and Background

2.4.1 Development of the Natatorium

The area that encompasses the current site of the Natatorium, the Waikiki Aquarium, and Kaimana Beach was originally Crown Lands and, in 1877, were part of the lands designated by King Kalākaua as a public park and "a place of innocent refreshment for all who wish to leave the dust of the town streets" (DPR 1985a). After the overthrow of the Hawaiian monarchy, a large portion of the public park was deeded to the Republic and then transferred into private

ownership. However, in 1919, under Act 191 of the Legislature of the Territory of Hawai‘i, Governor C.J. McCarthy appropriated \$200,000 to repurchase 6.4 acres of the park land, transferring it back into public ownership and designating future development of that land for the purposes of a memorial park (ibid.).

In 1921, Act 15 of the Legislature of the Territory of Hawai‘i authorized the construction of a memorial at the property, which was to honor “the men and women of Hawai‘i who served during the great war” (Act 15, S.B. No. 5, 1921). Act 15 also specified that the memorial’s plans include a swimming course at least 100 meters in length, appropriated \$250,000 for the construction of the monument, and authorized and appropriated \$10,000 to conduct an architectural competition for the design of the memorial.

The Natatorium was constructed in 1927 as a “living” monument to those persons from Hawai‘i that served during World War I. The facility consisted of a 330-foot by 120-foot (100-meter by 36.6-meter) salt water swimming pool and surrounding pool deck; bleachers; restrooms, locker, and shower facilities; storage; and office space. To the side of the grand entry, fronting the arched arcades, were two large saltwater reflecting pools. The entire structure was constructed in shallow offshore waters, extending from the shoreline seaward. Plates 1 and 2 show the Natatorium under construction.

2.4.2 Chronological Summary of the Natatorium’s Structural/Maintenance Issues and Demolition and Restoration Efforts

Constructed in 1927, maintenance of the Natatorium became an issue as early as 1929. Basic repairs were made and the deep section of the pool dredged and enlarged to make high diving safe. By 1949, major refurbishing was needed: structural and electrical installations were undertaken for \$81,886, including a new diving tower, floodlights for swim meets, concrete floor around the pool, and a sewer pump (DPR 1985a).

The 1949 refurbishment appears to have added only limited life to the structure. Over the succeeding years, the Natatorium continued to deteriorate, ultimately leading to its closure in 1979. In addition to the structural problems, the Natatorium was plagued by water quality concerns, which forced a temporary closure in 1963. Although improper initial design decisions and construction techniques were found to cause the initial difficulties experienced by the Natatorium, these problems were increased by general neglect of the structure over the years (DPR 1985a).

Both the State and the City have commissioned several studies and reports over the past five decades. The first comprehensive assessment of the Natatorium’s physical condition was undertaken in 1964. Inspection of original construction revealed a depth of concrete over the steel reinforcing insufficient to protect the steel from the effects of salt water infiltration, and the concrete mix itself was determined to be of poor quality (DPR 1985a).

The 1964 assessment noted an impending U.S. Army Corps of Engineers (USACE) project to widen Waikīkī Beach would partially block water exchange to the already inadequate pool circulation, and thus recommended the pool area be filled to create a beach (Wolbrink 1965). The USACE Waikīkī Beach Widening project took until 1972 to complete environmental documents and align funding for the project, which included demolition of the Natatorium

structure and creation of a beach between the Diamond Head and Ewa seawalls. The City, as the operating entity, and the State, as the landowner, were supportive of the change as the "...benefits gained by the increased beach land would outweigh the value of saving and rehabilitating the Natatorium" (USACE 1973, p. 8).

Plans for demolition were countered by efforts to restore the deteriorating structure. A lawsuit was brought against USACE's District Engineer and the Director of the cooperating agency, State of Hawai'i Department of Transportation. The 1973 ruling by the State Supreme Court halted demolition, determining that the project failed to comply with State statutes by not properly withdrawing the subject land area (including the Natatorium) from a previously issued Governor's executive order, thus the legislature did not have an opportunity to disapprove of the change as requested by law (DPR 1985a).

In May 1976, a City Building Department inspection found extensive deterioration of the structure where spalling (peeling) concrete revealed rusting of exposed steel reinforcing bars in the beams and slabs supporting the bleachers. The City's Water Safety Division (Lifeguard headquarters) subsequently was moved out of the space beneath the bleachers (DPR 1985a). In 1978, the pool was closed based on further City Building Department inspections, and in June 1979, the Department of Parks and Recreation (DPR) locked the Natatorium structure.

From 1979 to 1982, private and public entities explored proposals and options for the Waikiki War Memorial Park and Natatorium. The City initiated master planning for Kapi'olani Regional Park in 1982, creating policy and conceptual designs intended to restore the park to the general intention of King Kalākaua. Specifically for the War Memorial site, the DPR proposed demolition of the Natatorium structure, with retention of the memorial arch if feasible, with the resultant beachfront area returned to open beach park space (DPR 1982).

During the 1982 state legislative session, a House Concurrent Resolution was passed stating that the overriding public purpose of the land was to serve as a memorial park honoring Hawaii's World War I veterans, and that commercial use was inappropriate. The Resolution went on to state that a subordinate purpose of the Natatorium was to serve as an arena for competitive swimming, though this was no longer a valid purpose due to the number of new pools holding competitive events at that time. The Resolution recommended demolition of the Natatorium structure and open space improvements, with retention of the memorial stone, plaque and archway, if feasible. The resolution requested DLNR submit another report to the 1983 legislature to address alternate means to remove the Natatorium and improve the park, and to provide design costs for: beach restoration; conversion of all or part of the makai walls to groins for a protected swim area; and conversion of the area into a landscaped peninsula with handicapped access (HCR 173).

Movement toward demolition of the Natatorium spurred efforts by community groups to preserve and restore the structure. The 1986 legislature appropriated funds for planning and design work to restore the Natatorium. Citing the results of a user survey, and DPR's concerns related to liability, public safety, and operations and maintenance costs, DLNR tasked the engineering firm of Leo A. Daly with investigating two alternatives—complete and partial

restoration. By 1995, an Environmental Impact Statement was approved with “complete restoration” as the proposed action.

The 1995 plan called for demolition of the bleacher structure including supporting columns and beams, with repair of the entry arch and arcade wall and reuse of windows where possible. Reconstruction of the bleacher structure on the existing foundation was proposed to utilize pre-cast concrete, with new supporting beams and columns. Bathrooms fixtures were to be added, in keeping with DOH regulations for swimming pools. Pool restoration plans included demolition of the seawalls above the water line, and removal of pool decks, beams, and 92 supporting piles to below seafloor level, with reconstruction of these elements. Groin extensions of 60 feet and 80 feet parallel to the shoreline (each 35 feet wide at their base and tapering to 10 feet at mean sea level) were to be constructed to improve water circulation within the pool, and required dredging and removal of reef and existing substrates outside the current pool site. The pool footprint was to be dredged to a consistent 11-foot depth. “Construction” time for the entire project was estimated at 30 months (DLNR 1995).

The City picked up the State’s plans, allocated funding for restoration and obtained permits. Restoration work on the ‘land-based’ (bleacher structure) portion was initiated in 1999. A lawsuit halted restoration on the grounds that ‘ocean-based’ (below the high-water mark; i.e., the pool area) permits had not been secured. Settled in 2000, the court findings allowed the City to complete work on the land-based portion of the structure. The court’s prohibitions on pool restoration were to be terminated when DOH adopted new public swimming pool rules specifically for salt water pools, and the City provided declarations that, if constructed as designed, the pool would comply with the new (to be developed and adopted) rules.

The area under the bleachers, including restrooms with showers and space for the City and County Ocean Safety and Lifeguard Division, was re-opened in Memorial Day ceremonies in 2000. DOH regulations for salt water pools went into effect mid-2002, and required a mechanical pumping system to circulate water throughout the pool at regulated intervals, as well as cleanable bottom and sides of the pool structure. The design for the restored pool (partially described above) did not meet the new regulations.

In May 2004, a section of the pool deck collapsed, leading to closure of the public restrooms. Subsequent to a visual inspection survey that evaluated the Natatorium’s structural condition and ascertained any potential safety hazards the restrooms were reopened in November 2006. Table 1 below is excerpted from the 2004 inspection report and is a summary of the structural conditions noted during the visual survey.

Table 1. Summary of the Structural Conditions of the Natatorium, 2004

Structural Component	Condition Summary
Concrete Deck Slab	Three sections of the concrete deck slab were collapsed with several other sections showing signs of distress Extensive cracking, excessive deflection and obvious signs of corrosion <i>Imminent collapse hazard*</i>
Perimeter Sea Walls	Extensive concrete spalling with numerous segments that have fallen into the ocean Sections visibly out of plumb Exposed corroded steel reinforcing <i>Potential collapse hazard*</i>
Bleacher Supports	Beam Supports exhibit cracks in the plaster finish ✓ Potential indicators of corrosion ✓ Potential indicators of support settlement
Slab-On-Grade	Extensive cracking in areas below the bleacher structure
Entry Arch Support	Stains and cracking on archway finish ✓ Potential indicators of corrosion ✓ Potential indicators of support settlement
Bleacher Seating, Slab, and Walls	Deterioration of resurfacing finish exhibited by extensive cracking and spalling ✓ Potential indicators of corrosion ✓ Exposes substructure to moisture

*Emphasis is from the inspection report

(DDC 2004, pg. 2)

Later in 2004 unspent restoration funds were made available for protection of public health and safety, including proposed stabilization of the structure by driving 80 piles in the inner pool. The City Council debated spending \$6 million when the result would not be a re-opened facility, and mayor-elect Hannemann stated he was opposed to the restoration effort. As one of his first acts in office, Hannemann suspended repair work (HA 2005 Jan 4).

2.4.3 Alternative Use Study and Task Force

The City subsequently contracted a planning firm to analyze alternate uses for the Waikiki War Memorial Complex. The City also contracted separately with the USACE to investigate how various alternatives that include modifying or removing the Natatorium would affect the shoreline.

In 2009, Mayor Hanneman convened a Natatorium Task Force (hereafter referred to as the “Task Force”) to conduct a series of public meetings and make a recommendation with respect to the future of the Natatorium. The Task Force was presented background regarding various alternatives for the project site. At the conclusion of the Task Force meetings, the group voted

and by majority selected a memorial beach option—creation of additional beach space by demolishing the Natatorium structure, and construction of a replica triple-arch entry inland from its current location. While not a unanimous decision (a group of members subsequently submitted a “Dissenting Opinion” to register their desire to stabilize the pool), the City commissioned engineering studies to ensure feasibility of the selected option.

2.4.4 Current Conditions

Since the restoration efforts were halted in 2000, no work on the Natatorium has been undertaken, except to address imminently hazardous conditions such as falling concrete. Continued exposure to the ocean environment and weathering is causing continued deterioration of the Natatorium’s reinforced concrete. The majority of the reinforced concrete pool deck appears to be structurally unsound with large portions having already collapsed into the water below, the outer corners of the seawall are rotating out and are no longer vertical, and in some areas, the seawall is separating from the deck (DDC 2008a). The pool deck’s deterioration has reached a point that no one is permitted on it except for inspection and emergency work. Monthly inspections by City’s DDC evaluate visual changes in the structural integrity of the facility in an on-going effort to minimize risk to public safety. Plates 9 through 18 show the current deteriorated state of the Natatorium.

The City has funded emergency construction contracts to remove spalling concrete and a section of seawall in danger of falling outside the Natatorium. Plans to contain such debris from the deteriorating structure or from possible catastrophic failure due to natural forces (tsunami; earthquake) were compiled in the 2008 *Emergency Preparedness Contingency Plan*.

2.5. Proposed Action and Alternatives

2.5.1. Proposed Action: War Memorial Beach

The City’s preferred alternative to satisfy the purpose and need for the proposed project is to create a war memorial beach between constructed groins, fronted by a replica memorial arch in alignment with the existing Roll of Honor plaque and hau tree arbor. The entire Natatorium structure—everything built seaward of the 1927 shoreline—would be removed. This alternative—removal of the Natatorium and creation of a new beach—was the recommendation made to the City and County of Honolulu by the Task Force in September 2009.

War Memorial Beach

In 2008, the USACE completed a study to evaluate the effect seven conceptual beach configurations would have on the shoreline. The study’s findings, which were presented to the 2009 Task Force, concluded that it is feasible to retain Kaimana Beach and to create and retain an adjacent new sand beach between two parallel groins. Further, it was determined that an L-headed groin was the most effective configuration to create a stable and desirable beach shape.

The city is currently engaged in advanced conceptual engineering to refine the L-head groin configuration. This effort involves developing variations of the L-head groins for comparative and analysis purposes to facilitate identification of a groin structure and plan configuration that would best meet the needs of the proposed project. Considerations that have influenced the planning/design of the beach retention structures include:

- Minimizing impacts to the existing Kaimana beach.
- Staying within the existing Natatorium footprint as much as practicable/possible.
- Utilizing existing Natatorium structures, or portions thereof, if possible.
- Visible portions of the existing Natatorium structure are very deteriorated, particularly on the Ewa side where the wall foundation is severely undermined.
- Water depths on the Ewa side of the Natatorium are highly variable, ranging from 1 to 2 feet on the nearshore reef flat and 10+ feet in the 150-foot wide offshore dredged channel.
- Existing geotechnical information indicates poor foundation conditions, with loose sandy soil and silty lagoonal deposits to a depth of about 30 feet below sea level. This material is moderately to highly compressible, with potential settlement under load of about 3 feet occurring rapidly after loading.

The seabed between the groins will be raised to approximately 5-foot depth and overlain with long-lasting geotextile fabric topped with rock, then sand. Sand for the new beach would be reclaimed from an offshore deposit, matching as close as possible the size and color of the existing sand at Kaimana Beach. The reclaimed sand would be placed along the shoreline between the two groins; the amount of dry beach area and swim area would vary depending on the groin configuration. The groin options included in this EISPN are preliminary and may evolve as the conceptual engineering process continues.

Option 1: Two groins almost entirely within the Natatorium footprint; approximately 42,000 square feet (sf) of dry beach and 14,000 cubic yards (cy) of sand

Diamond Head Structure

L-head rock rubblemound groin; 140-foot long stem and 60-foot long head; crest elevation +7.5 feet to +6 feet

- 4,000 lb armor stone over 400 lb underlayer
- East side toe buttressed by existing Natatorium seawall base
- Concrete mat foundation

Ewa Structure

- L-head groin; 175-foot long structural concrete seawall stem and a 60-foot long rock rubblemound head; crest elevation +7.5 feet to +6 feet
- Concrete seawall stem supported by 24-inch steel pipe piles
- Concrete stem has a facing of sloping rock riprap on the new beach side
- Concrete mat foundation under rock rubblemound head

Option 2: Ewa side extends beyond Natatorium footprint and Diamond Head L-head groin largely within the footprint; approximately 53,000 sf of dry beach and 17,500 cy of sand

Diamond Head Structure

L-head rock rubblemound groin; 140-foot long stem and a 60-foot long head; crest elevation +7.5 feet to +6 feet

- 4,000 lb armor stone over 400 lb underlayer
- East side toe buttressed by existing Natatorium seawall base
- Concrete mat foundation

Ewa Structure

- 230-foot long structural concrete seawall stem, extending to the shallow sea floor on the oceanside of the dredged channel; crest elevation +7.5 feet to +6 feet
- Concrete seawall stem supported by 24-inch steel pipe piles
- Concrete stem has a facing of sloping rock riprap on the new beach side
- 70-foot long rock rubblemound head constructed on stable reef rock foundation; crest elevation +6 feet
- Groin would extend approximately 65 feet beyond the existing Natatorium footprint
- Would provide 30 to 50 feet more dry beach width on the west side compared to Option 1

Option 3: Ewa side extends beyond Natatorium footprint and Diamond Head side largely within the footprint; approximately 45,000 sf of dry beach and 15,000 cy of sand

Diamond Head Structure

- 140-foot long straight rock rubblemound groin; crest elevation +7.5 feet to +6 feet
- Groin would terminate landward of the shallow reef seaward of the Natatorium
- Shorter straight groin without a head provides for approximate 4 feet deep water access between the new beach and Kaimana beach
- Elimination of the L-head reduces new beach width on the east side
- East side toe buttressed by existing Natatorium seawall base
- Concrete mat foundation

Ewa Structure

- 230-foot long structural concrete seawall stem, extending to the shallow sea floor on the oceanside of the dredged channel; crest elevation +7.5 feet to +6 feet
- Concrete seawall stem supported by 24-inch steel pipe piles
- Concrete stem has a facing of sloping rock riprap on the new beach side
- 70-foot long rock rubblemound head constructed on stable reef rock foundation; crest elevation +6 feet
- Groin would extend approximately 65 feet beyond the existing Natatorium footprint
- Would provide 30 to 50 feet more dry beach width on the west side compared to Option 1

Creation of a new beach would require that the entire Natatorium structure—the pool and surrounding deck and seawalls; the bleachers; the restrooms and office/operational space beneath the bleachers; the arched arcade and triple-arched entry; and the parking lot and volleyball courts—be demolished and removed.

The Proposed Action includes other park improvements: constructing a new bathhouse, pedestrian pathways and parking improvements. Figures 4, 5 and 6 show the conceptual groin configuration options currently being evaluated under the City's Proposed Action, Figures 7 and 8 are cross sections of the proposed Ewa seawall and the Diamond Head rubblemound groin, and Figure 9 is a conceptual rendering of the new replica memorial arch and war memorial beach.

Replica Memorial Arch

In homage to the World War I veterans and the Natatorium as a memorial, the new memorial arch would be constructed as an exact replica of the existing Natatorium entrance—the triumphal arch flanked by two lesser round arches—sited to frame the new war memorial beach as viewed from the existing Roll of Honor plaque. To protect the memorial arch from possible ocean damage due to severe wave/storm conditions, the new memorial arch would be located approximately 80 feet mauka (inland) of the Natatorium’s entrance, in alignment with the existing hau tree arbor.

Landside Park Improvements

Figures 4 through 6 depict the City’s preferred landside park improvements, which include the following:

- Construction of a new bathhouse and outdoor shower facility between Kaimana Beach and the new memorial beach. The bathhouse would be ADA-compliant.
- Replacement of the internal road/parallel parking that bisects the site with a consolidated lot at the park’s south side. The capacity of the new parking lot would be sufficient to retain the same number of stalls (77) currently at the project site. The existing curbcut on Kalākaua Avenue would be reused to access the new parking lot. Metered parking will be implemented
- Construction of a new paved walkway that extends the existing Kapi‘olani Regional Park shoreline promenade to Kaimana Beach. The promenade currently ends near the boundary between the Waikīkī Aquarium and the project site. Additional paved walkways would also connect the shoreline promenade to the new bathhouse and parking lot, and the Roll of Honor plaque.

Alternatives for landside park improvements with respect to vehicular access/circulation and parking are being considered and if deemed feasible, will be included in the EIS for analysis.

2.5.2. Alternative 1: Reconstruction and Restoration of the Natatorium

This alternative would involve the reconstruction and restoration of the Natatorium in accordance with the 1998 plans, with the exception of the ocean-fed pool design. The open-cycle salt water pool proposed in the 1998 plans is not compliant with the DOH salt water pool rules enacted in 2002 and its construction would result in an unusable public swimming pool. In consideration of compliance with the DOH salt water pool regulations and the Task Force evaluations, it was determined that development of a closed system pool would be the most practical solution for a reconstructed and restored Natatorium. In addition, various landside improvements within the project site would also be undertaken. Figure 10 is a site plan of the reconstruction and restoration alternative. Proposed improvements under this alternative are described in further detail below.

Swimming Pool

Additional conceptual development of a closed-system pool will be undertaken by the City to facilitate a comprehensive and equitable analysis between alternatives in the EIS. Based on previous engineering analysis and design, the top half of the outer seawalls and supporting piles would have to be removed and reconstructed as proposed in the 1998 plans. The closed-system

pool design would integrate with those reconstructed elements and would have walls and bottom surfaces that can be easily cleaned and scrubbed to remove bacterial film and use a mechanical pumping system to meet the required water exchange.

Bleacher Structure, Entry Arch and Arcade

Landside restoration efforts were completed in 2000 and included repair work on the bleacher structure, entry arch and arcade. This work was a downscaled version of the original 1998 restoration plans, which called for removing and reconstructing the bleacher structure with pre-cast concrete slab construction; reconstructing non-bearing walls; repairing and reinstalling original windows to the extent possible; and demolishing and replacing supporting columns and beams on existing foundation. At the time, the City made a financial decision to value engineer the scope of work so that it could be accomplished within the available funds. As a result, the bleacher structure was repaired rather than reconstructed. This was a lower cost alternative in the short-term, but required a long-term commitment to continual repairs. Presently, the bleacher structure continues to deteriorate requiring emergency work to remove loose concrete and perform limited patching that allows continued use of the bathroom facilities.

At a minimum, a costly repair project and other improvements would have to be implemented to ensure continued use of the bleacher structure and spaces below. Repair work would include, among other things, waterproofing and new plasterwork for the bleachers, addressing areas that have spalled and cracked, and possible localized reconstruction in targeted areas. Even if repaired, the bleacher structure would require continual monitoring and maintenance. Due to the lifecycle costs of continual monitoring and maintenance, the option of reconstructing the bleacher structure, as originally planned, is being explored.

Landside Improvements

Landside improvements include demolishing and reconstructing the volleyball court and the Ewa parking lot immediately fronting the Natatorium. Improvements would also be made to the central entry ramp leading to the Natatorium's triple arch entry. Other park improvements include a new exterior shower, paved walkways, and new street lights for the driveway. The existing driveway would remain. The hammerhead turnaround at the Aquarium end of the driveway would be revised to meet current City standards.

2.5.3. Alternative 2: No Action Alternative

Under the No Action alternative, the Natatorium would remain in its current dilapidated condition and the pool and bleachers would remain closed to the public. There would be no change to the land use or facilities that currently exist at the site. This alternative would maintain the status quo—all structures would remain in place and continue to deteriorate.

Due to the public safety hazards presented by the current condition of the Natatorium and related liability borne by the City, monitoring of the structural condition would continue and, if warranted, imminent hazards would be mitigated in accordance with the recommendations of the *2008 Waikiki War Memorial Complex (Natatorium) Emergency Preparedness Contingency Plan*.

2.6. Time Frame and Proposed Schedule

Completion of the Final EIS is anticipated for summer of 2016. After all land use, environmental, and construction permits and approvals, as well as financing are secured, construction of the proposed project would then be allowed to commence.

2.7. Estimated Project Cost

Order of magnitude costs for planning and budgeting purposes were developed and presented at the 2009 Task Force meetings. At that time, implementation of the City's Proposed Action was estimated to cost approximately \$15.1 million in 2011 dollars. The advanced conceptual engineering effort currently underway will result in a more refined estimate of project costs. These figures will be presented in the EIS.

3. SUMMARY OF AFFECTED ENVIRONMENT AND POTENTIAL ENVIRONMENTAL CONSEQUENCES

3.1. Natural Environment

3.1.1. Geology and Hydrology

The project site is located in Waikīkī at the eastern end of Honolulu. Waikīkī was, until the beginning of the 20th century, a wetland and marsh containing only a narrow sandy strand at the shoreline. Massive efforts to divert the inland waters allowed the city to lay down imported sand to create Waikīkī's famous white sand beaches that are maintained to the present day by periodic re-nourishment projects (SOEST 2014).

The surface topography of the project site is generally flat at an average ground surface elevation of seven feet above Mean Sea Level (MSL). The geology of the project site consists of beach deposits that were formed by the erosion of paleo coral reefs which have been re-worked by waves and deposited as beach deposits. To the east of the project area lies alluvium and Honolulu Volcanics tuff cone deposits. Subsurface conditions at the site can be generalized into four predominant soil or geologic units: 1) Fill – Consisting primarily of medium stiff to stiff brown elastic silt with sand and roots; 2) Beach Deposits – Consisting primarily of very loose to medium dense, tan to off-white coralline sand and silty coralline sand; 3) Lagoonal Deposits – Consisting primarily of very loose, off-white to gray silty coralline gravel and sand with abundant shell fragments; and 4) Coral Reef Limestone/Coralline Deposits – Consisting primarily of loose to dense, off-white to tan silty well graded coralline gravel with sand. The substrate underlying the Natatorium structure is moderately to highly compressible, consisting of loose sandy soil and silty lagoonal deposits to a depth of about 30 feet below sea level.

There are no surface water sources present within the landside portion of the project site. Landside surface waters within the general vicinity of the project site include the Ala Wai Canal and the Mānoa and Pālolo Streams. The Ala Wai Canal is located approximately 0.75 miles north of the project site and discharges into the Ala Wai Boat Harbor approximately 1.75 miles to the northwest. The Mānoa Stream and Pālolo Stream converge into the Mānoa-Pālolo Drainage Canal located approximately 6 miles north of the project site. The Mānoa-Pālolo Drainage Canal in turn discharges into the Ala Wai Canal approximately 1.25 miles to the north.

Surface waters within the project site are limited to the coastal ocean waters. Coastal surface waters within and in the immediate proximity of the project site include a dredged channel, approximately 150 feet wide and 10 feet deep which fronts the Waikīkī Aquarium and abuts the north side of the Natatorium. The shoreline faces toward the west-southwest with offshore bathymetry contours causing deepwater waves to refract and approach the shore from a west-southwesterly direction. The fringing reef fronting the project site is shallow (approximately -1 to -3 feet below the mean lower low water mark) and provides protection to the shoreline from large swell and storm waves (DDC 2008a).

Groundwater beneath the landside portion of the project site is encountered at approximately 7 feet below ground surface. Due to the site's proximity to the ocean, groundwater resources are tidally influenced.

3.1.2. Water Quality

In the State of Hawai‘i marine waters are divided into Class AA and Class A waters. In accordance with Chapter 11-54-06 HAR, the objective of Class AA waters is to preserve them “in their natural pristine state as nearly as possible with an absolute minimum of pollution or alteration of water quality of any human-caused source or actions.” The objective of Class A waters is to ensure that their use for recreational and aesthetic enjoyment is protected. The waters of Waikīkī including the project site are designated a Class A waters.

In-water demolition and/or construction activities will be required to implement the proposed alternatives. In-water demolition and/or construction activities could result in potential adverse impacts to coastal water quality. A water quality assessment is being conducted; its findings and any recommended mitigation measures will be included in the EIS.

3.1.3. Biological Resources

3.1.3.1. Terrestrial Biological Resources

The landside portion of the project site is comprised of a public beach park. The park is regularly frequented by the public for picnics, exercise, volleyball, and various other beach and ocean-related recreational activities. Given the developed urban character of Waikīkī and the consistent public use of Kapi‘olani Park and the project site, terrestrial fauna which have been observed within the project area include feral animals such as cats (*Felix domesticus*), rats (*Rattus spp.*), and common non-native avian species including, the lace-necked dove (*Streptopelia chinensis chinensis*), red-vented bulbul (*Picnonotus cafer*), and the common mynah (*Acridotheres tristis tristis*).

The park is dotted with numerous trees comprised predominately of coconut trees (*Cocos nucifera*) with scattered milo trees (*Thespesia populnea*) and a few palms along its Kalākaua Avenue side. A distinguishing feature of the project site is the hau tree (*Hibiscus tiliaceus*) arbor that extends along the mauka side of the decorative perimeter wall surrounding the parking lot and volleyball court. Ironwood trees are located in the sidewalk planting strip and median along Kalākaua Avenue.

There are a number of “exceptional trees” located within and adjacent to the project site and include two large Indian banyan trees (*Ficus benghalensis*) located within the northern portion of the site and the ironwood trees (*Casuarina equisetifolia*) along Kalākaua Avenue. Exceptional trees are regulated by the City and County of Honolulu under the Revised Ordinances of Honolulu Chapter 41, Section 13 and are defined as “a tree or grove of trees with historical or cultural value or which by reason of its age, rarity, location, size, esthetic quality or endemic status has been designated by the city council as worthy of preservation”.

The intent of these regulations is to safeguard trees not only for their beauty but also for their important ecological function. It is unlawful to remove or destroy any exceptional tree without approval from the City Council. It is also unlawful to alter the characteristic shape of any exceptional tree or remove any branch without first obtaining a permit issued by the DPR.

Potential impacts to terrestrial biota including exceptional trees resulting from implementing the proposed alternatives will be fully analyzed in the EIS.

3.1.3.2. Marine Biological Resources

Relative to the limited terrestrial flora and fauna within the project site, marine biota within the project site and the offshore coastal waters is more abundant and diverse. The Waikiki-Diamond Head Shoreline Fisheries Management Area and the Waikiki Marine Life Conservation District comprise the nearshore waters immediately west and north of the project site, respectively (Figure 1). As in most of Hawaii's off-shore waters, threatened and endangered marine species, such as the threatened green sea turtle (*Chelonia mydas*) and endangered Hawaiian monk seal (*Monachus schauinsland*), could potentially occur in waters off Waikīkī and in the open ocean.

The project site is situated at the southern end of Waikīkī Beach, and is fronted by a shallow fringing reef flat. The dominant benthic organisms on the reef platform are marine macro-algae or *limu*, which cover virtually all exposed hard surfaces that are not scoured or buried by shifting sand. Algal species observed on the walls of the Natatorium and in adjacent areas include *Dictyosphaeria reticulata*, *Bryopsis* sp., *Halimeda discoidea*, *Neomeris annulata*, *Ulva reticulata*, *Lyngbya majuscula*, *Dictyota sandvicensis*, *Sargassum polyphyllum*, *Lobophora variegata*, *Padina* sp., *Ralfsia pangoensis*, *Sphacelaria furcigera*, *Amansia glomerata*, *Centroceras clavulatum*, *Grateloupia filicina*, *Halymenia Formosa*, *Plocamium sandvicense*, *Poroloithon onkodes*, and *Spyridia filamentosa* (SEA 1992). Macro-invertebrates seen in the general vicinity of the project site, and often on the Natatorium pool walls, include crab, snails, urchins, and various sponges (AECOS 2007, 2008, 2009).

The most common corals found in the vicinity of the Natatorium are *Pocillopora meandrina* and *Porites lobata* (SEA, 1992). Surveys of the general Waikīkī reef flat have recorded the presence of all the following coral species: *Cyphastrea ocellina* (MRC 2007; AECOS 2007, 2008, 2009), *Montipora capitata*, *M. patula*, *P. evermanni*, *Psammocora stellata*, *Leptastrea purpurea* (AECOS 2007, 2008, 2009, 2010).

The fish community in the nearshore waters off Waikīkī is largely structured by the local topography and bottom composition on the reef flat; however, fishes are uncommon. Surveys in the vicinity of the Natatorium found the most common species to be wrasses (*Thalassoma duperrey*, *T. trilobatum*, *Stethojulis balteata*), *Acanthurus triostegus* (*manini*), and *Abudefduf abdominalis* (*mamo*). The surveys also found several species of small juvenile fishes inhabiting small holes and spaces in the reef structure (SEA 1992).

In summary, the proposed alternatives are not anticipated to adversely impact terrestrial flora and fauna, but have the potential to adversely impact the marine biological communities within the project site and adjacent areas. The primary potential impact to marine biological communities would likely result from in-water construction and/or intensified recreational activities. A marine biological survey is being prepared that will also assess potential direct, indirect, and cumulative environmental impacts on biological resources as a result of the proposed alternatives.

3.1.4. Air Quality

Air quality in the Waikīkī area, as with most areas of the island of O'ahu, is generally considered good due to the presence of prevailing northeast trade winds from inland areas out to sea.

Likewise, at the project site air quality is also considered good as it is in a coastal area and is also influenced heavily by circulating ocean winds. Adverse impacts to air quality resulting from construction and/or operational activities of the proposed alternatives are not expected to be significant; potential impacts will be evaluated in the EIS.

3.1.5. Climate and Natural Hazards

The climate of the Honolulu area is typical of the leeward coastal lowlands of O‘ahu. The area is characterized by abundant sunshine, persistent trade winds, relatively constant temperatures, moderate humidity, and infrequent severe storms. Northeasterly trade winds prevail throughout the year, although its frequency varies from more than 90 percent during the summer months to 50 percent in January. The average annual wind velocity is approximately 10 miles per hour. The mean temperature measured at Honolulu International Airport range from 70 degrees Fahrenheit in the winter to 84 degrees Fahrenheit in the summer. Temperatures at the project site may be slightly cooler due to increased wind velocities near the open waters. The average annual precipitation in Honolulu is approximately 24 inches, with most of the rainfall occurring between November and April (Juvik et. al., 1998).

The Waikīkī coastline is shielded by the island mass from the North Pacific winter swell and much of the northeast trade wind waves that are present throughout the year. Therefore, the southern swell predominates during the summer months, while locally-generated wind and Kona storm waves predominate during the winter months (DDC 2008a).

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps for Honolulu, the project site is located within zones VE and AE. Zone AE refers to areas subject to inundation by the 1 percent annual chance flood event with designated Base Flood Elevations; while, Zone VE entails coastal areas subject to inundation by the 1 percent annual chance flood event with additional hazards due to storm induced velocity wave action with designated Base Flood Elevations (FEMA 2012).

Natural hazards which can potentially impact the project site include seismic events (earthquakes), tsunami, and hurricanes. The entire project site is located within the tsunami evacuation zone, as identified by the Hawai‘i Civil Defense. Additionally, in the event of a passing hurricane the project site’s coastal location increases its potential to be adversely impacted by both wind and high wave action. Potential adverse impacts associated with high waves generated by tsunami or hurricanes at the project site include debris over wash, flooding, erosion, high wave energy and turbulence in the nearshore zone, and strong currents.

Areas most susceptible to earthquake damage are areas that are built on unconsolidated sediments that will tend to experience heightened ground motion. These regions cover the southern half of O‘ahu along the coast from Makaha around Diamond Head to Makapu‘u to Kāne‘ohe Bay (DDC 2008a).

The Natatorium is built on unconsolidated marine sediments, small patch reefs, and some unconsolidated fill under the bleachers. As such, earthquakes could cause damage to the Natatorium depending on the earthquake's epicenter location and magnitude. Facilities proposed under the alternatives being considered will be designed and constructed in accordance with site-

specific geotechnical and structural engineering investigations and would comply with applicable design codes.

3.2. Man-Made Environment

3.2.1. Land Use and Tenure

As previously noted, the project site is located within the Kapi‘olani Regional Park and is utilized by the general public for beach park and ocean-related recreational activities. The project site encompasses approximately 6.74-acres and is delineated by three tax map keys (TMKs) that include both offshore and onshore areas: (1) 3-1-031:003, (1) 3-1-031:009, and (1) 3-1-031:010 (Figure 2).

While the entire project site falls within the boundaries of the Kapi‘olani Regional Park, only a portion is within the Kapi‘olani Park Trust. Parcel 3, which is owned by the State of Hawaii, but managed by the City and County of Honolulu, is not within the Trust boundaries. This parcel encompasses the entirety of the Natatorium, including the volleyball courts, entry ramp, and courtyard parking area (i.e. everything makai of the decorative courtyard perimeter wall). Parcel 9, which is owned by the City and County of Honolulu, and Parcel 10, which is owned by the State of Hawai‘i are part of the Trust lands and fall under the authority of the Kap‘iolani Park Trustees; however, the City’s DPR is responsible for its day-to-day management and operation. Sitting members of the Honolulu City Council comprise the Kapi‘olani Park Trustees.

No change in land use is anticipated; the proposed alternatives would result in the continued public recreational use at the project site and would be consistent with the existing recreational uses of the surrounding area. The EIS will address potential land use impacts from intensified recreational land use activities that may result from implementing the proposed alternatives.

3.2.2. Infrastructure and Public Services

The project site and its immediate vicinity are situated within the urban and developed Waikīkī area. It is served by a variety of public services and utilities including fire and police protection, water supply, wastewater collection, solid waste disposal, telecommunications systems, electricity, and drainage. The City and County of Honolulu provides sewer, water, security and emergency services (i.e., police, fire, and medical services). Hawaiian Electric Company provides electrical services through overhead lines and underground conduits, and Hawaiian Telcom has existing telecommunications infrastructure at the project site and surrounding area.

The EIS will further discuss existing infrastructure and public services and assess potential impacts to these services resulting from implementing the proposed alternatives.

3.2.3. Public Safety and Health

As previously discussed, the Natatorium, in its current condition, poses a health and safety risk to area users due to the swim basin’s water quality and the facility’s deteriorated structural condition. Under the No Action alternative, structural failure and collapse due to the continual deterioration of the structures poses the greatest hazard to public health and safety. Deterioration is an ongoing and continuous process that will increase as key parts of the Natatorium structure fail. The 2004 structural condition report that was commissioned by DDC after a section of the

pool deck collapsed concluded that the concrete deck slabs posed an imminent collapse hazard and the perimeter seawalls were a potential collapse hazard.

The progressive deterioration of the swim basin structure could potentially affect the integrity of the bleacher structure, which was evaluated to be in generally good overall condition. However, this was based on visual observation only and cracks in the bleacher support structure could indicate corrosion of reinforcing steel or foundation settlement. The report states: “The perimeter sea walls provide a buffer for the swim basin and the bleacher structures, protecting them from direct exposure to the forces of the open ocean. The failure of the perimeter sea walls would leave the swim basin and bleacher structures exposed to the ocean tide and wave forces that the swim basin and bleacher structures were not designed to resist. This exposure could potentially lead to the accelerated deterioration of the bleacher’s support structure through corrosion of foundation elements and erosion of the subgrade, thus threatening its integrity” (DDC 2004, p. 31).

The EIS will examine potential public safety and health impacts associated with continued deterioration of the Natatorium as well as any impacts associated with implementation of the proposed alternatives.

3.2.4. Visual and Aesthetic Resources

Visual and aesthetic resources include scenic vistas, scenic overlooks, unique topography, or visual landmarks having scenic value. The project site includes grassy areas, picnic tables and benches, the beach and other recreational facilities. The visual character at the project site is not representative of visual and aesthetic environments associated with other typical beach parks in Hawai‘i. The Waikīkī War Memorial Natatorium provides a unique visual and aesthetic landscape to the project area.

Adverse impacts to visual and aesthetic resources are not anticipated as a result of the proposed alternatives. Both the appearance of the replica memorial arch and new memorial beach or the reconstructed/restored Natatorium would be consistent with the visual aesthetic of the project site’s existing memorial beach park environment. Potential beneficial and adverse impacts resulting from the proposed alternatives will be assessed in the EIS.

3.2.5. Recreational Resources

Kaimana Beach is a popular destination for its broad sandy beach and easy open water access. The park, beach area and nearshore waters are used for sunbathing, picnicking, swimming, stand-up paddle boarding, paddle boarding (kneeling), and snorkeling, while further offshore recreational activities include surfing, body surfing, and body boarding. The Kapua Channel, which is located at the south end Kaimana Beach, is one of a few safe passages from the shore to the open ocean and is utilized by water sports competitions, water sport enthusiasts, and recreationists. Organized events occurring in the vicinity of the project site include the Waikīkī Rough Water Swim, the Hawaiian Christmas Long Distance Invitational Rough-H2O Swim, and the Windsock Swim. While no paddling events are permitted currently by the City and County, many single and double person outrigger canoe paddlers train and race in the area. The popular surf break, Old Man’s, is accessed from the Kapua Channel. Fishing is also allowed in coastal waters south off the Natatorium on even years only. Diving (spear fishing) is a popular activity during these years.

Recreational activities will be affected by temporary construction-related activities; however, it is anticipated that implementation of the proposed alternatives would result in long-term beneficial impacts on recreational activities at the project site. The EIS will further discuss adverse and beneficial impacts to recreational resources at the project site and surrounding area.

3.2.6. Traffic and Circulation

The primary road access to the project site is via Kalākaua Avenue, a north-south roadway along the east side of the site. Kalākaua Avenue is a two-way divided roadway with one travel lane, a bike lane, and parking along each side. The angled parking along the northbound side is metered and limited to four hours, whereas the southbound parallel parking is unmetered.

A two-lane, two-way driveway enters the project site from Kalākaua Avenue from an unsignalized T-intersection. U-turns are allowed along the northbound and southbound approaches of Kalākaua Avenue. Parking is provided along both sides of this driveway, and fronting the Natatorium where the historic structure originally contained a reflecting pool. There are currently 77 parking spaces throughout the project site that are unmetered with no time limit.

A traffic impact assessment study is being prepared that will analyze potential project-related impacts on traffic and circulation and recommend mitigation measures as necessary.

3.2.7. Noise Environment

In the vicinity of the project site, ambient sound levels are influenced primarily by vehicular traffic along Kalākaua Avenue including cars, motorcycles, mopeds, buses, and intermittent emergency vehicles. In addition, ocean surf, residential, recreational park, and beach goer activities also comprise the background noise environment in the project area.

Noise impacts related to Proposed Action operations include potential changes in intermittent background noise levels due to the proposed location of the new parking lot at the south end of the project site. The potential changes could occur due to the concentration of intermittent noise sources (talking, car door slamming, vehicle alarms, etc.) closer to the adjacent residences and resort units along the south property boundary.

Noise impacts resulting from construction and demolition is inevitable; however, these impacts are temporary, and activities would be conducted in compliance with DOH regulations for Community Noise Control (HAR 11-46) including obtaining a noise permit or variance if required. Pile driving may be needed to construct the proposed alternatives. As a result, marine or underwater noise and vibrations would be generated, which could potentially have adverse effects on marine life in the area. Construction methodology for the project will be evaluated to determine appropriate mitigation measures to minimize underwater noise impacts. In addition, a noise impact study is being conducted and its findings and recommended mitigation measures will be provided in the EIS.

3.2.8. Archaeological, Historic, and Cultural Resources

As previously noted, the Natatorium was constructed in 1927 as a “living” monument to Hawaii’s men and women that served during World War I. In 1980 it was placed on both the State Register of Historic Places, identified with Site No. 80-14-9701 and the National Register

of Historic Places, identified with National Register Information System No. 80001283. In May 2014, the National Trust for Historic Preservation named the Waikīkī War Memorial Natatorium a National Treasure.

Implementation of the City's preferred alternative (Proposed Action)—removal of the Natatorium and creation of a new memorial beach in its place—will have a significant adverse impact on this historic resource. Formal consultation with concerned parties is planned and will be initiated during the EIS process.

The greater ahupua'a of Waikīkī has been the location of many archaeological investigations which have resulted in the identification of many buried subsurface archaeological features, sites and human burials (iwi kūpuna). To date, no known human remains have been identified within the project site. However, a cultural impact assessment and an archaeological inventory survey are being completed to fully assess potential impacts to archaeological, historic, and cultural resources. Findings and any proposed mitigation measures will be provided in the EIS.

3.2.9. Socioeconomic Setting

The socio-economic environment is a reflection of economic and social factors on the island. The EIS will address potential project-related impacts on the socio-economic environment. Analysis will include impacts on minority and low-income populations, employment and population projections, local business, and economic and fiscal conditions and will be discussed in the EIS.

4. ANTICIPATED DETERMINATION

The City's DDC has determined that the anticipated impacts resulting from implementing the proposed project could potentially rise to a significant level and thus requires preparation of an EIS pursuant to HRS Chapter 343 and Title 11, Chapter 200, HAR. In particular, the City's preferred alternative to satisfy the purpose and need for the proposed project, its Proposed Action—the removal of the Natatorium and creation of a new beach in its place—will have significant adverse impacts on a historic structure listed on both the State and National Registers of Historic Places.

5. PUBLIC AND AGENCY INVOLVEMENT

The City has engaged in an ongoing process of public and agency involvement in the development of the proposed project. Efforts began in 2009, when a Task Force was convened to conduct a series of public meetings and make a recommendation to the Mayor with respect to the Natatorium's future. In 2012, a scoping meeting was held with various regulatory agencies with jurisdiction and/or environmental expertise pertinent to the proposed project. More recently, interviews were held with key stakeholder groups to identify issues and questions they felt needed to be addressed in the EIS and early consultation request letters were distributed to concerned agencies, elected officials, a broader range of stakeholder groups, and individuals to solicit input on the proposed project.

Scheduled and completed public and agency involvement efforts for the proposed project are summarized in Table 2 below followed by summary descriptions.

Table 2. Completed and Scheduled Public and Agency Involvement Activities to Date

Activity	Date
Development/Formation of Natatorium Task Force	January - May 2009
Task Force Kick Off Meeting	May 28, 2009
Task Force Meeting #2	June 25, 2009
Task Force Natatorium Site Visit	July 15, 2009
Task Force Meeting #3	July 30, 2009
Task Force Meeting #4	August 27, 2009
Task Force Meeting #5 and vote	September 24, 2009
Completion of the Task Force Summary Report	October 2009
Regulatory Agency Scoping/Early Consultation Meeting	April 12, 2012
Key Stakeholder Outreach (Invitation Letter Mail Out)	March 27, 2014
Key Stakeholder Outreach (Stakeholder Interviews)	April 4 - May 9, 2014
Early Consultation (Letter Mail Out)	April 29, 2014
Early Consultation (Public Comment Period)	April 30 – May 30, 2014
Stakeholder Scoping Meeting	July 21, 2014

5.1. Task Force Meetings

In 2009, the City and County of Honolulu Mayor Mufi Hannemann convened a Task Force to conduct a series of public meetings for the purpose of developing and recommending a course of action to address the blighted conditions of the aging Waikīkī War Memorial Natatorium. The Task Force was charged with reviewing and discussing background information on the history and structural condition of the Natatorium, reviewing alternative land uses for the project site, and making a recommendation to the Mayor. The Task Force meetings were conducted under the rules of the Hawai'i State Sunshine Law (HRS Chapter 92), and as such, were open to the

public for participation and comment. The Task Force met once a month from May to September 2009 in the Mayor's conference room at City Hall; each meeting lasted approximately three hours.

Eighteen individuals were invited to be members of the Task Force; 16 of those accepted. Task Force chairperson, Collins Lam, then Deputy Director of the DDC was the 17th member. Seven of the 17 members served in the armed forces during World War II, the Korean War, or the Vietnam War. Others were affiliated with public advocacy groups with interests in historic preservation, Hawaiian culture, ocean recreation, and Waikiki's overall physical and business environment; representatives of adjacent property owners/uses; and resource specialists.

Initially, the Task Force was given information on four potential alternatives for the site: 1) no action, 2) full reconstruction/restoration either with or without a pool that would meet current DOH regulations for public pools, 3) demolition of the Natatorium, creation of a beach in its place, and reconstruction of the Natatorium's three-arched entrance either on-site or at the Central O'ahu Regional Park, and 4) demolition of the Natatorium and restoration of the 1927 shoreline. The Task Force was asked to review these potential alternative actions, as well as make recommendations to each alternative.

Through the course of the Task Force meetings, these initial potential alternatives were explored and expanded upon to include variations. Additionally, the Task Force discussed other potential alternatives for the project site, including: 1) demolition of the Natatorium and development of a new Waikiki Aquarium, 2) development of an off-shore sand volleyball complex and recreation center, and 3) partial restoration of the bleachers and opening a reflecting pool in place of the saltwater swimming pool.

At the end of the five month period, the Task Force, at its September 24, 2009 meeting, voted on potential alternatives for the site. A quorum was present and the vote was nine in favor of the memorial beach option, with six of the nine votes in favor of the reconstructing the Natatorium's three-arched entry at the project site, near the hau tree arbor. Three votes were cast for reconstruction and restoration of the Natatorium (DDC 2009). A group of Task Force members subsequently submitted a "Dissenting Opinion" to register their desire to stabilize the pool, keeping open the option of future restoration.

5.2 Early Consultation Meeting with Permitting Agencies

On April 12, 2012, the City held an early consultation meeting with federal, state and county agencies that would be involved in the numerous permits and approvals needed to implement the proposed project. The purpose of the meeting was to assist with defining the scope of analysis for the EIS, including: 1) what information agencies would like to see incorporated to understand existing resources and impacts; and 2) potential ideas regarding mitigation of impacts. A brief background of the project and development of the City's preferred alternative was presented followed by questions and answers. The following agencies attended the early consultation meeting.

City and County of Honolulu

- Corporation Counsel
- Department of Design and Construction
- Department of Planning and Permitting, Land Use Permits Division, Urban Design Branch
- Department of Planning and Permitting, Land Use Permits Division, Land Use Approval Branch

State of Hawai‘i

- Department of Business, Economic Development and Tourism, Coastal Zone Management Program
- Department of Health, Environmental Health Administration, Clean Water Branch
- Department of Land and Natural Resources, Historic Preservation Division, Architecture Branch
- Department of Land and Natural Resources, Office of Conservation and Coastal Lands

Federal

- Army Corps of Engineers, Honolulu District, Regulatory Branch
- Department of the Interior, Fish and Wildlife Service, Coastal Conservation Programs
- Department of Commerce, National Marine Fisheries Service, Pacific Islands Regional Office

5.3. Outreach Interviews with Key Stakeholder Groups

In March 2014 invitation letters were distributed to key stakeholder groups to request their participation in one-on-one interviews; many of the invited groups were involved in the 2009 Task Force meetings. The purpose of the “scoping” interviews was to provide these key stakeholder groups a venue in which to identify their specific concerns and questions about the proposed project that would assist in defining the scope of the EIS. Seventeen key stakeholders were sent invitations; the 15 listed below agreed to participate.

- | | |
|---|--|
| • Historic Hawai‘i Foundation | • Friends of the Natatorium |
| • Kaimana Beach Coalition | • New Otani Kaimana Beach Hotel |
| • Waikīkī Aquarium | • Waikīkī Improvement Association |
| • World War II Filipino American Veterans | • American Legion, Department of Hawai‘i |
| • Veteran of Foreign Wars, Department of Hawai‘i | • Korean War Veterans Association, Aloha Chapter |
| • Kapi‘olani Park Preservation Society | • Waikīkī Swim Club |
| • Dr. Charles “Chip” Fletcher (resource specialist) | • American Institute of Architects, Honolulu Chapter |
| • Waikīkī Roughwater Swim Committee, Inc. | |

These outreach interviews will culminate in a stakeholder scoping meeting in which findings from these interviews will be presented and opportunity given to submit additional issues and questions that should be addressed in the EIS. The meeting will be held on July 21, 2014 at the Kaimuki High School cafeteria.

5.4. Early Consultation

In April 2014, a total of ninety three pre-assessment consultation request letters were distributed to concerned federal, state and local agencies; elected officials; a broader range of stakeholders groups; and individuals to solicit input on the proposed project. Thirty-one comment letters or

emails were received during this phase of the EIS process. The distribution list and responses received are attached to this EISPN as Appendix A.

6. LIST OF PERMITS AND APPROVALS

The following is a list of anticipated permits, approvals and consultations that may be needed to implement the proposed project.

Section 404, Department of the Army Permit
Section 401, Water Quality Certification
Coastal Zone Management Consistency Review
HRS Chapter 6E Historic Preservation Review and Section 106 Consultation
Conservation District Use Permit
National Pollution Discharge Elimination System Permit
Shoreline Setback Variance
Special Management Area Permit
Diamond Head Special District Permit
Zoning Waiver
Building Permit
Demolition Permit
Grading Permit

7. REFERENCES

- Act 15, Senate Bill No. 5. 1921. Hawai‘i Territorial Legislature. Appropriation of funds to provide a memorial to the men and women of Hawai‘i who served during the great war.
- Ad Hoc Committee on the Disposition of the Natatorium. 1981. *Report of the Ad Hoc Study Committee on the Disposition of the Natatorium*. November.
- AECOS, Inc. (AECOS). 2007. *Marine Environmental Monitoring for the Kuhio Beach Small-Scale Beach Nourishment Project, Waikīkī, O‘ahu*. Prepared for DLNR-OCCL. AECOS Report No. 936B.
- AECOS, Inc. (AECOS). 2008. *Marine Environmental Monitoring for the Kuhio Beach Small-Scale Beach Nourishment Project, 3-Month and 15-Month Post Dredging Monitoring Results, Waikīkī, O‘ahu*. Prepared for DLNR-OCCL. AECOS Report No. 936G.
- AECOS, Inc. (AECOS). 2009. *Marine Biological Resources Near Gray’s Beach, Waikīkī, O‘ahu*. Prepared for Sea Engineering. AECOS Report No. 1152.
- AECOS, Inc. (AECOS). 2010. *Marine Biological and Water Quality Resources Off Waikīkī Beach, Waikīkī, O‘ahu*. Prepared for Sea Engineering. AECOS Report No. 1205A.
- Akita, K. 1973. Memorandum to Mr. Sunao Kido, Chairman of the Board of Land and Natural Resources. November 5.
- Department of Design and Construction, City and County of Honolulu (DDC). 2004. *Existing Building Structural Condition Report, War Memorial Natatorium*. Prepared by Wilson Okamoto Corporation (WOC) for DDC. July.
- Department of Design and Construction, City and County of Honolulu (DDC). 2008a. *Final Waikīkī War Memorial Complex (Natatorium) Emergency Preparedness Contingency Plan*. Prepared by Wil Chee – Planning & Environmental, Consulting Structural Hawai‘i, Inc., and EKNA Services, Inc. for DDC. September.
- Department of Design and Construction, City and County of Honolulu (DDC). 2008b. *Final Environmental Assessment: Kapi‘olani Regional Park Master Plan Update. Waikīkī, District of Honolulu, O‘ahu, Hawai‘i*. Prepared by Gerald Park Urban Planner and Miyabara Associates for DDC. April.
- Department of Design and Construction, City and County of Honolulu (DDC). 2009. *Waikīkī War Memorial Natatorium Task Force Summary*. Prepared by Wil Chee – Planning & Environmental (WCP) for the DDC. October.
- Department of Health, State of Hawai‘i (DOH). 2002. Adoption of Chapter 10 of Title 11, Hawai‘i Administrative Rules, Public Swimming Pools. July 3.

- Department of Land and Natural Resources, State of Hawai‘i (DLNR). 1981. *Report on S.R. 209 (SLH 1981) Relating to the: Waikiki War Memorial Natatorium, To the Legislature, 1982 Regular Session*. December.
- Department of Land and Natural Resources (DLNR). 1990. *Waikiki War Memorial Park & Natatorium, Kapi‘olani Park, Honolulu, O‘ahu, Hawai‘i. Volumes 1 (Executive Summary) and 2 (Planning Report), Report R-81*. Prepared by Leo A. Daly for Department of Land and Natural Resources, State of Hawai‘i. June.
- Department of Land and Natural Resources (DLNR). 1995. *Final Environmental Impact Statement Waikiki War Memorial Park and Natatorium*. Prepared by Leo A. Daly for the Division of Water and Land Development, Department of Land and Natural Resources, State of Hawai‘i. January.
- Department of Land and Natural Resources, State of Hawai‘i (DLNR). 2011. News Release. *Waikiki-Diamond Head Shoreline Fisheries Management Area Opens to One-Year Fishing on January 12, 2012*. Released December 12, 2011. State of Hawai‘i.
- Department of Parks and Recreation, City and County of Honolulu (DPR). 1982. Oral Testimony of DPR Director to State Legislature on Senate Bills 2827-82; 2822-82; 2826-82; and 2821-82. February 23. Pages D-54 – 60 in DPR 1985a.
- Department of Parks and Recreation, City and County of Honolulu (DPR). 1983. *Waikiki 2000 Kapi‘olani Park Master Design Plan*. January.
- Department of Parks and Recreation, City and County of Honolulu (DPR). 1985a. *Final Historical Background Report, Waikiki War Memorial Park and Natatorium, Kapi‘olani Park, Honolulu, O‘ahu, Hawai‘i*. Prepared by The CJS Group Architects, Ltd., for the Department of Parks and Recreation, City and County of Honolulu. March.
- Department of Parks and Recreation, City and County of Honolulu (DPR). 1985b. *Final Preliminary Planning Report, Waikiki War Memorial Park and Natatorium, Kapi‘olani Park, Honolulu, O‘ahu, Hawai‘i*. Prepared by The CJS Group Architects, Ltd., for the Department of Parks and Recreation, City and County of Honolulu. March.
- Donald Wolbrink & Associates, Inc. (Wolbrink). 1965. *An Evaluation of the Waikiki Natatorium at Kapi‘olani Park, Honolulu, O‘ahu, Hawai‘i*. Prepared for the Department of Parks and Recreation, City and County of Honolulu. April.
- Federal Emergency Management Agency (FEMA). 2012. *National Flood Insurance Program, Flood Insurance Rate Map (FIRM), City and County of Honolulu, Hawai‘i*. September.
- House Concurrent Resolution (HCR) No. 173. 1982. Hawai‘i State Legislative Session. Related to the Waikiki War Memorial and Natatorium. April 13.

Honolulu Advertiser (HA). 2003 June 11. Natatorium's future remains uncertain. Accessed on March 14, 2012 from:
<http://the.honoluluadvertiser.com/article/2003/Jun/11/ln/ln01a.html>

Honolulu Advertiser (HA). 2004 August 10. Emergency repair set for Natatorium. Accessed on March 12, 2012 from:
<http://the.honoluluadvertiser.com/article/2004/Aug/10/ln/ln03a.html>.

Honolulu Advertiser (HA). 2004 October 28. Natatorium repairs, schedule to begin today, postponed. Accessed March 12, 2012 from:
<http://the.honoluluadvertiser.com/article/2004/Oct/28/ln/ln35p.html>.

Honolulu Advertiser (HA). 2005 January 4. Natatorium repairs on hold. Accessed March 12, 2012 from: <http://the.honoluluadvertiser.com/article/2005/Jan/04/ln/ln09p.html>

Honolulu Advertiser (HA). 2006 June 21. Natatorium faces another study. Accessed on March 9, 2012 from:
<http://the.honoluluadvertiser.com/article/2006/Jun/21/ln/FP606210341.html/index.html>.

Honolulu Star-Bulletin (HSB). 1929 June 7. When will something be done?

Honolulu Star-Bulletin (HSB). 1999 August 4. City cleared to start Natatorium restoration work. Accessed on March 9, 2012 from:
<http://archives.starbulletin.com/1999/08/04/news/story1.html>.

Honolulu Star-Bulletin (HSB). 2002 June 13. New rules may slow Natatorium project. Accessed 9/18/2006 from:
<http://the.honoluluadvertiser.com/article/2002/Jul/13/ln/ln19a.html/>

Izumi, Tsutomo. 1964 September 9. Letter to Mr. Theodore F. Nobriga, Director of the Department of Parks and Recreation, City and County of Honolulu.

Juvik, S. and J. Juvik (ed.), 1998. *Atlas of Hawai'i*, Third Edition. Honolulu, HI: University of Hawai'i Press.

Kudo, Emiko I. 1983 March 3. Testimony Submitted before the Committee on Ecology, Environment and Recreation on HCR No. 173 – Relating to the Waikiki War Memorial Park and Natatorium. (In: DLNR 1985a.)

Marine Research Consultants (MRC). 2007. *A Preliminary Baseline Assessment of the Marine Environment Fronting the Sheraton Waikiki Hotel, O'ahu, Hawai'i*. Prepared for Sea Engineering.

Pacific Business News (PBN). 1999, January 5. Coalition files suit against Natatorium development. Accessed on March 9, 2012 from:
<http://www.bizjournals.com/pacific/stories/1999/01/04daily5.html>.

Scientific Environmental Analysis (SEA), Ltd. 1992. *Quantitative Analysis of Marine Macrobiota in the Vicinity of the Waikīkī Natatorium, Waikīkī, O‘ahu*. Prepared for: Leo A. Daly.

University of Hawai‘i School of Ocean and Earth Science and Technology (SOEST). 2014. *Coastal Geology – O‘ahu*. Accessed on April 30, 2014 from: <http://www.soest.hawaii.edu/coasts/publications/hawaiiCoastline/oahu.html>

U.S. Army Corps of Engineers, Honolulu District (USACE). 1973. *Final Environmental Impact Statement, Beach Erosion Control Improvements, Waikīkī Beach, O‘ahu, Hawai‘i (Kapahulu Storm Drain to the Elks Club)*. 4 May.

U.S. Army Corps of Engineers, Honolulu District (USACE). 2008. *Shoreline Restoration Study, Conceptual Design Review Report*. Prepared by Sea Engineering, Inc., for the U.S. Army Corps of Engineers. June.

PHOTOGRAPHS

(Page Intentionally Left Blank)



Plate 1. Early Construction in the Shallow Offshore Waters, 1927

Source: City and County of Honolulu



Plate 2. Natatorium Bleachers and Pool Under Construction, 1927

Source: City and County of Honolulu



Plate 3. Triple Arch Entry, 1928

Source: City and County of Honolulu



Plate 4. Triple Arch Entry, 2006

Restoration of the entry arch was completed in 2000.

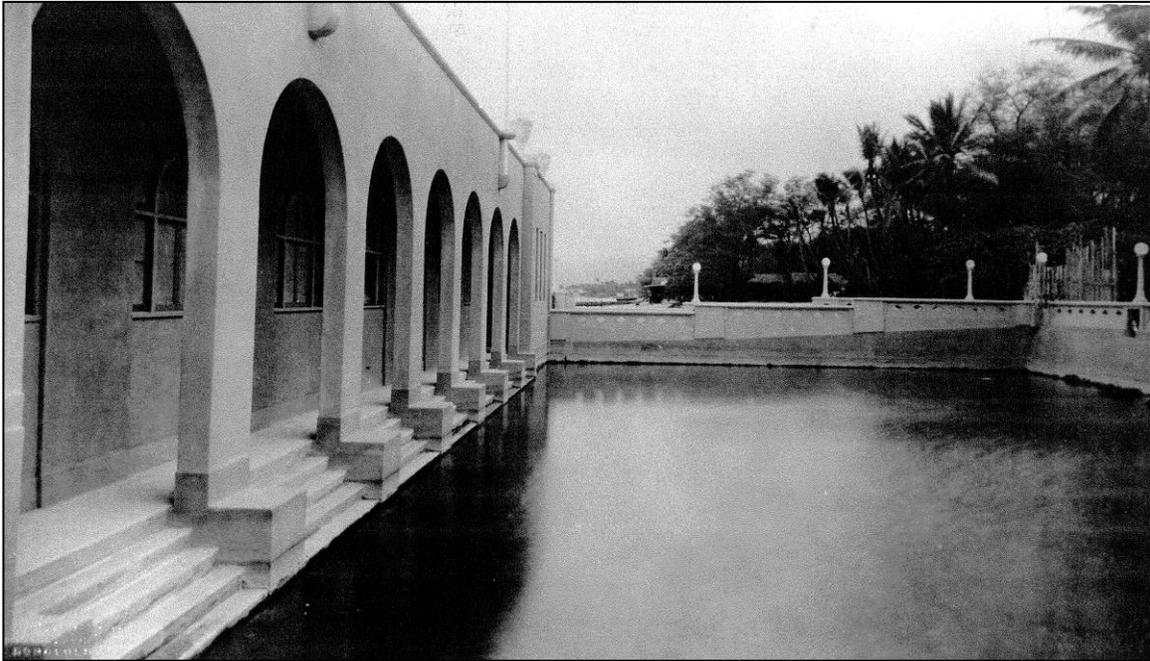


Plate 5. Ewa Reflecting Pool, 1928

Source: City and County of Honolulu



Plate 6. Mauka (park side) of Natatorium, 2006

Facing Diamond Head. The Ewa reflecting pool has been converted to a parking lot.



Plate 7. Bleacher Structure, 2007



Plate 8. Roll of Honor Plaque, 2010



Plate 9. Seawall Tilt, 2007
The tilt from vertical indicates that the top of the seawall is rotating seaward.



Plate 10. Cracked Seawall Ewa corner and Deck, 2007
The crack extends the entire width of the seawall and continues across the deck to its inner edge.



Plate 11. Cracked and Crumbling Perimeter Seawall, 2007



Plate 12. Collapsed Ewa Deck, 2007

Plate 13. Collapsed Mauka Deck Fronting the Triple Arch Entry, 2010



Plate 14. Cracked Ewa Deck, 2007

Portions of the precast concrete panels along the interior of the pool deck have cracked and fallen off exposing the underlying concrete support beam.



Plate 15. Repairs Made to Parapet Wall After the 2000 Renovation, 2006



Plate 16. Cracks in a Load Bearing Beam, 2006

The restroom was restored in 2000, shortly thereafter longitudinal cracks formed; it was repaired in 2005. The repairs are now cracking.



Plate 17. Spalling Plaster on Bleachers, 2006

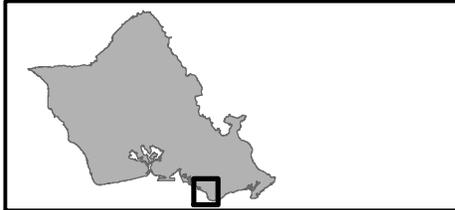


Plate 18. Cracks in the Restored Slab-on-Grade Concrete Floor, 2006

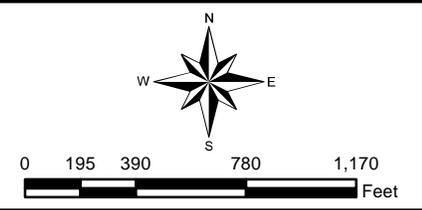
(Page Intentionally Left Blank)

FIGURES

(Page Intentionally Left Blank)



**Figure 1:
Waikiki War Memorial Complex
Project Location Map**

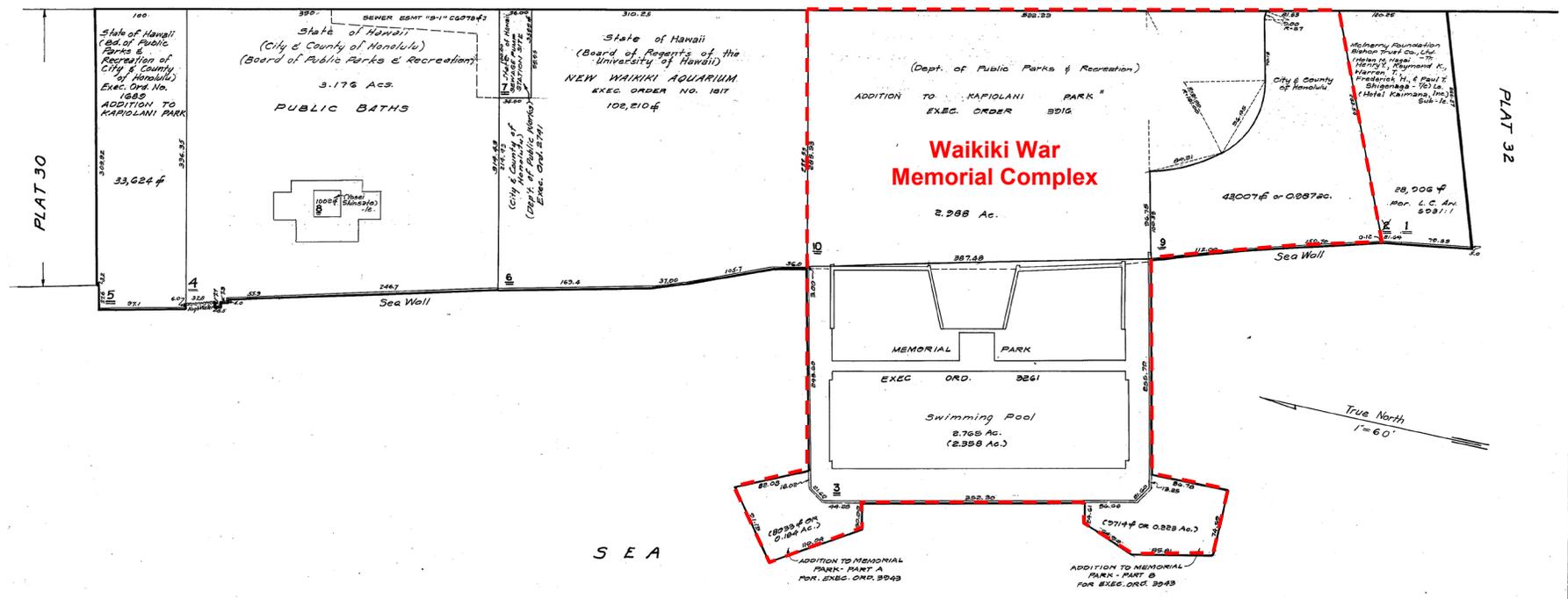


(Page Intentionally Left Blank)

KAPIOLANI PARK

PLAT 43

KALAKAUA AVENUE



KAPIOLANI PARK, WAIKIKI

Parcels Dropped:

FIRST DIVISION	ZONE	SEC.	PLAT
3	1	31	

ADVANCE SHEET
SUBJECT TO CHANGE
CONTAINING 5 PARCELS
Scale: 1 in = 60 ft.

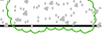
Figure 2: TMK Map

(Page Intentionally Left Blank)

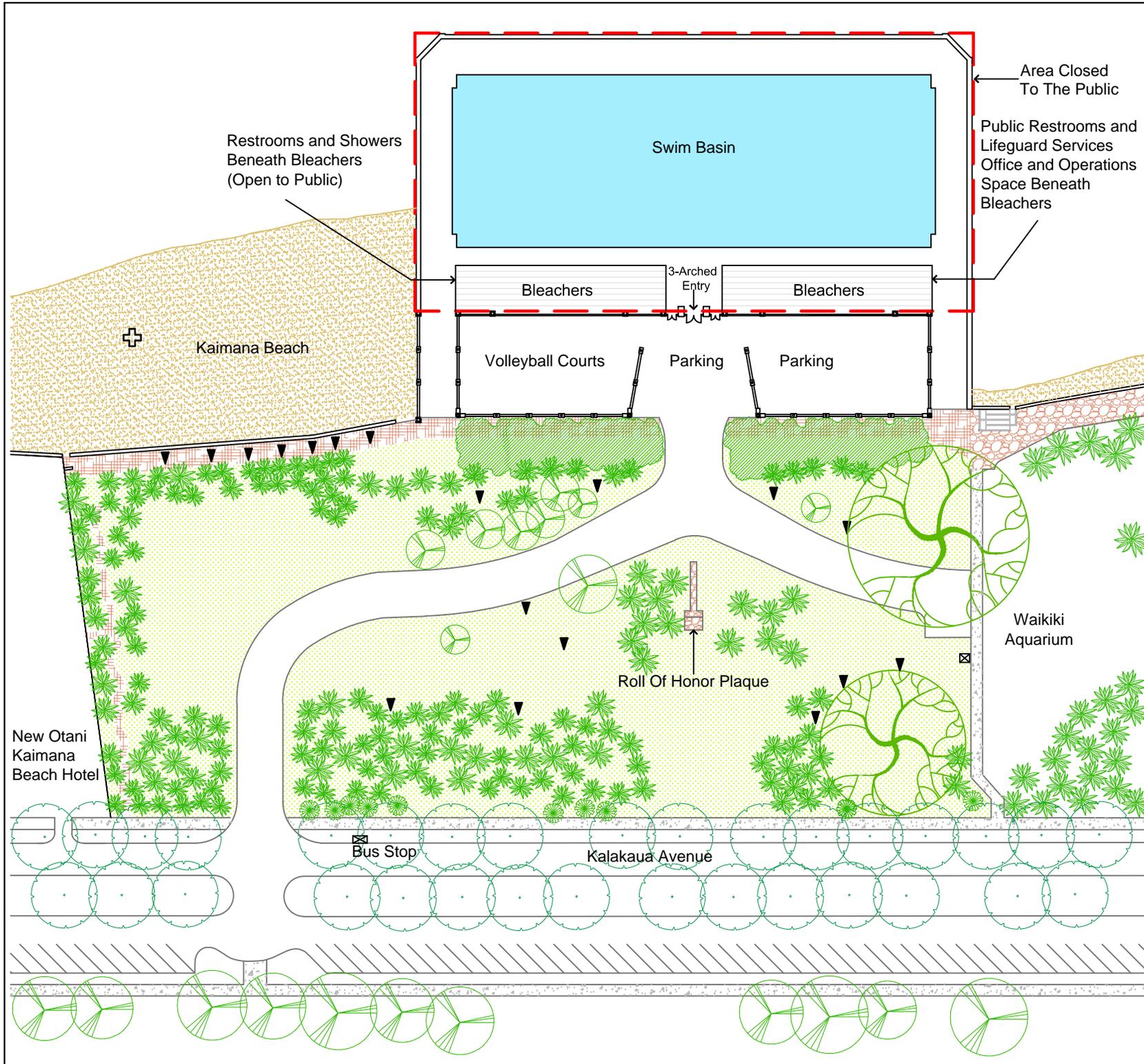
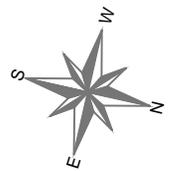
Waikiki War Memorial Complex

Figure 3: Existing Site

LEGEND

-  Exceptional Banyan Tree
-  Ironwood Tree
-  Existing Tree (representative)
-  Coconut Tree
-  Palm Tree
-  Hau Trees
-  Public Sidewalk
-  Paved Walkway
-  Unpaved Walkway
-  Lifeguard Stand (location approximate)
-  Benches/ Picnic Tables (location approximate)

June 2014



(Page Intentionally Left Blank)

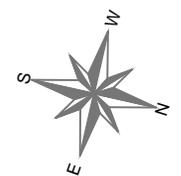
Waikiki War Memorial Complex

Figure 4: Proposed Action, Opt. 1

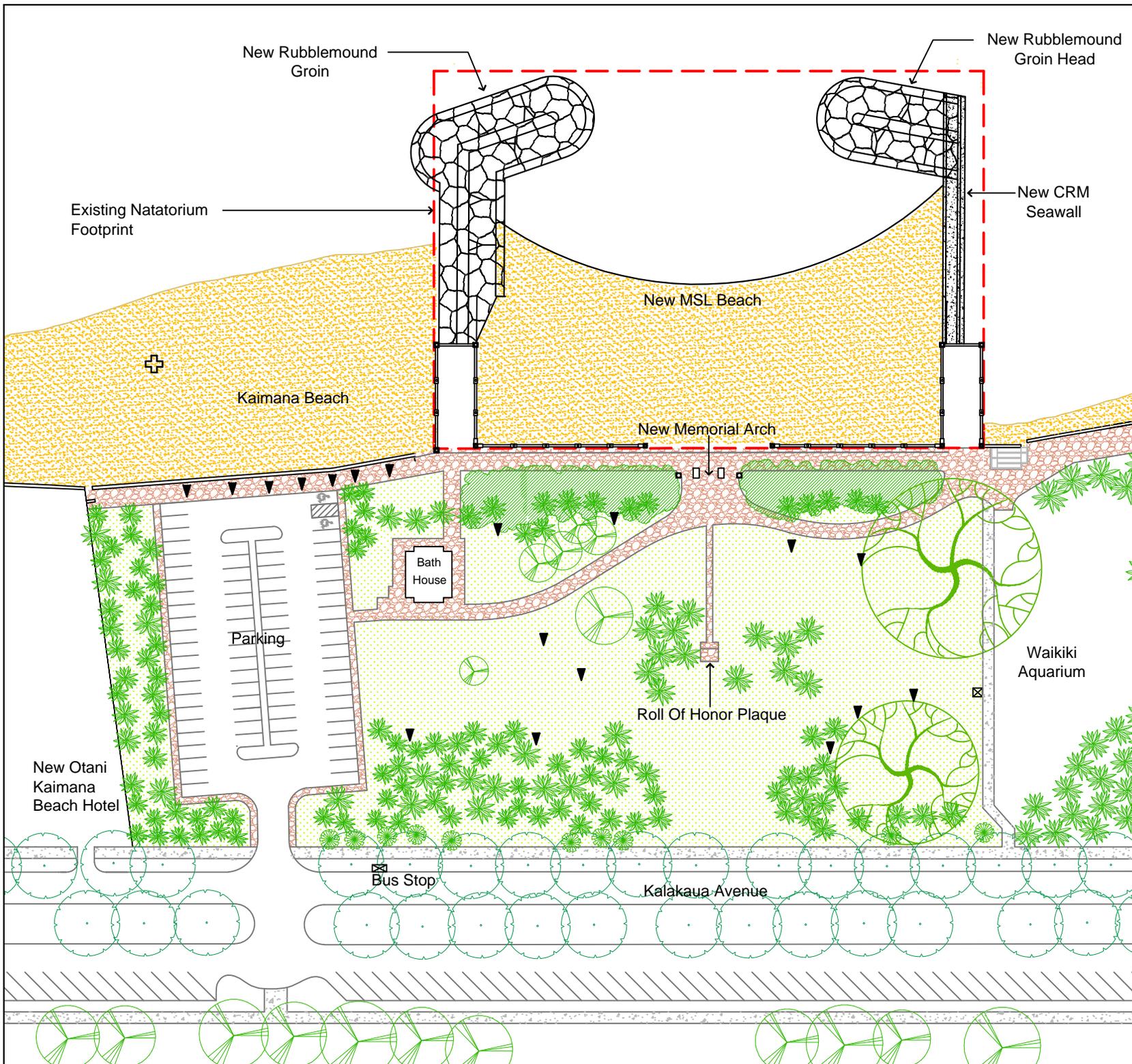
LEGEND

-  Exceptional Banyan Tree
-  Ironwood Tree
-  Existing Tree (representative)
-  Coconut Tree
-  Palm Tree
-  Hau Trees
-  Public Sidewalk
-  Paved Walkway
-  Lifeguard Stand (location approximate)
-  Benches/ Picnic Tables (location approximate)

June 2014



GRAPHIC SCALE IN FEET

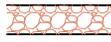


(Page Intentionally Left Blank)

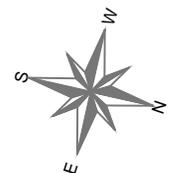
Waikiki War Memorial Complex

Figure 5: Proposed Action, Opt. 2

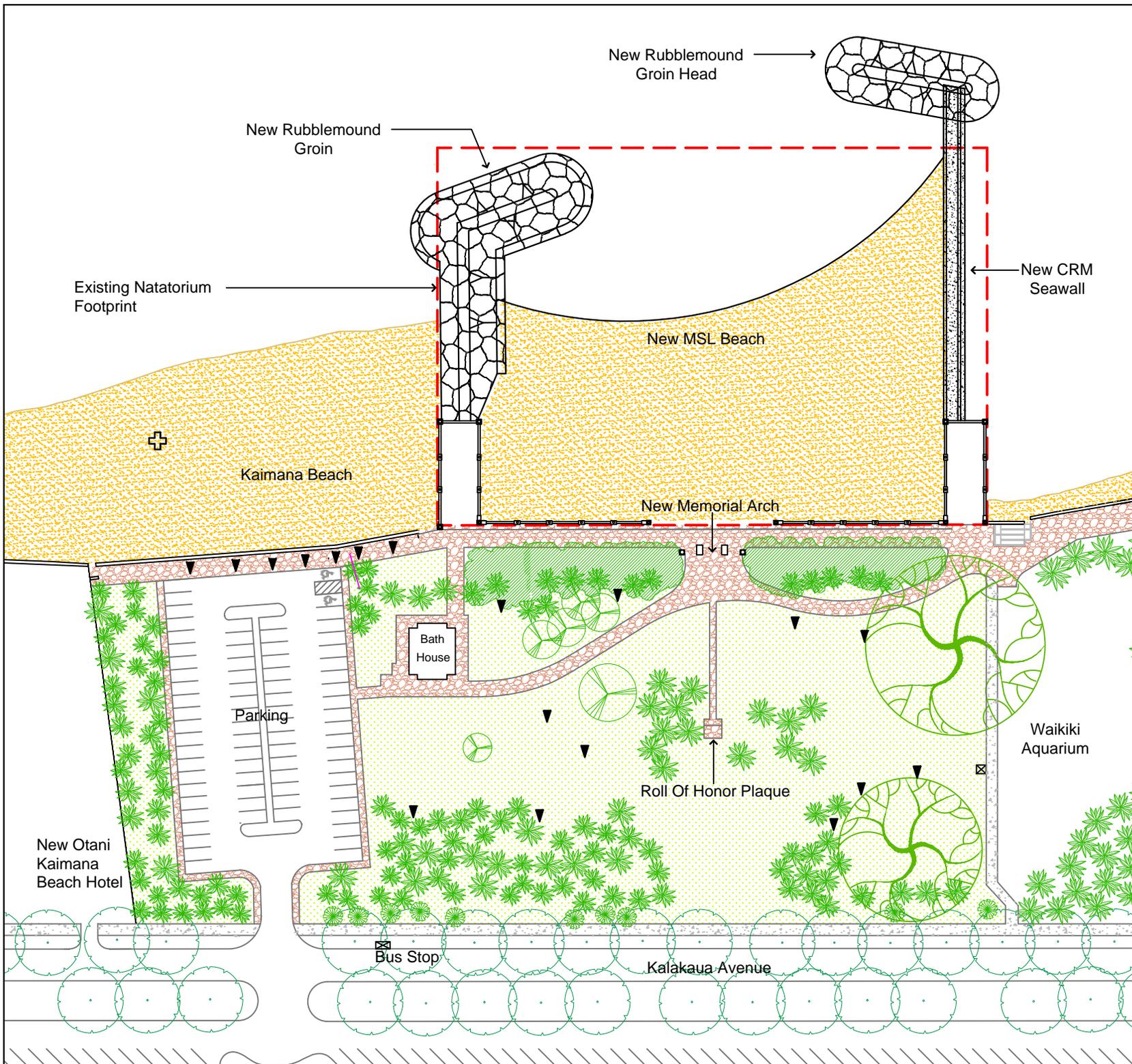
LEGEND

-  Exceptional Banyan Tree
-  Ironwood Tree
-  Existing Tree (representative)
-  Coconut Tree
-  Palm Tree
-  Hau Trees
-  Public Sidewalk
-  Paved Walkway
-  Lifeguard Stand (location approximate)
-  Benches/ Picnic Tables (location approximate)

June 2014



GRAPHIC SCALE IN FEET



(Page Intentionally Left Blank)

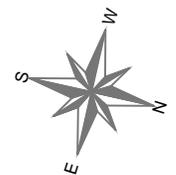
Waikiki War Memorial Complex

Figure 6: Proposed Action, Opt. 3

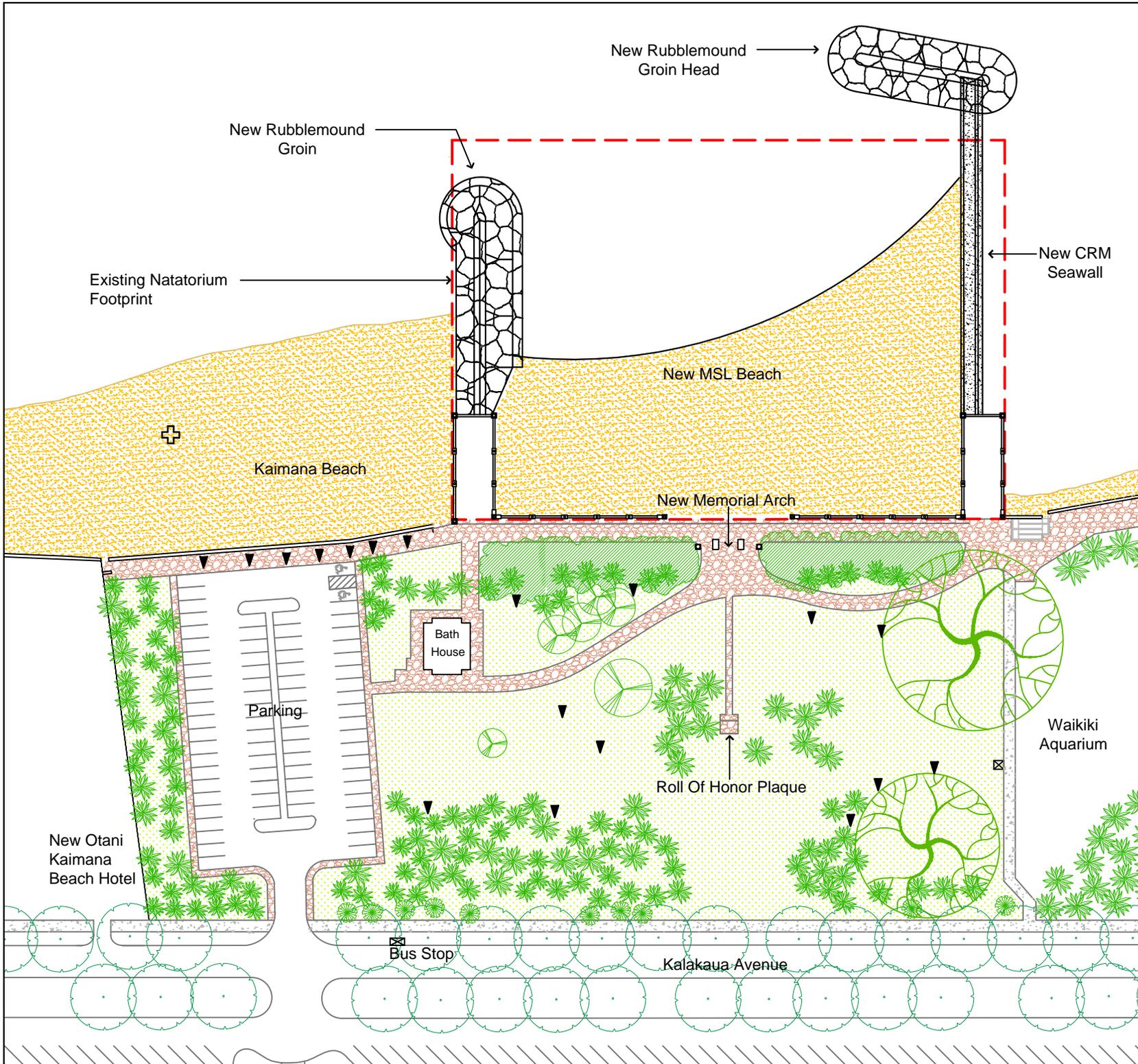
LEGEND

-  Exceptional Banyan Tree
-  Ironwood Tree
-  Existing Tree (representative)
-  Coconut Tree
-  Palm Tree
-  Hau Trees
-  Public Sidewalk
-  Paved Walkway
-  Lifeguard Stand (location approximate)
-  Benches/ Picnic Tables (location approximate)

June 2014



GRAPHIC SCALE IN FEET



(Page Intentionally Left Blank)

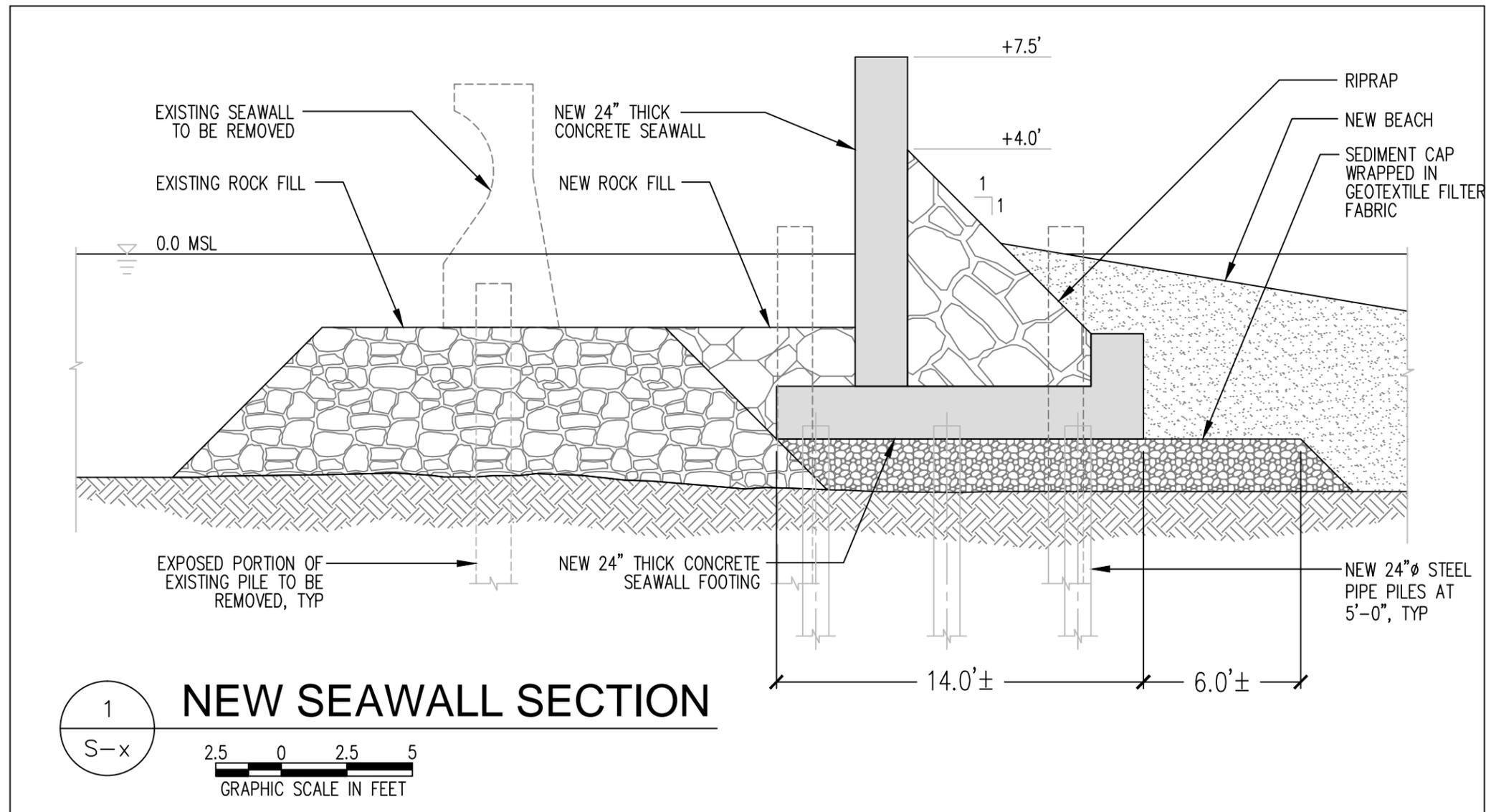


Figure 7: New Ewa Seawall Section

(Page Intentionally Left Blank)

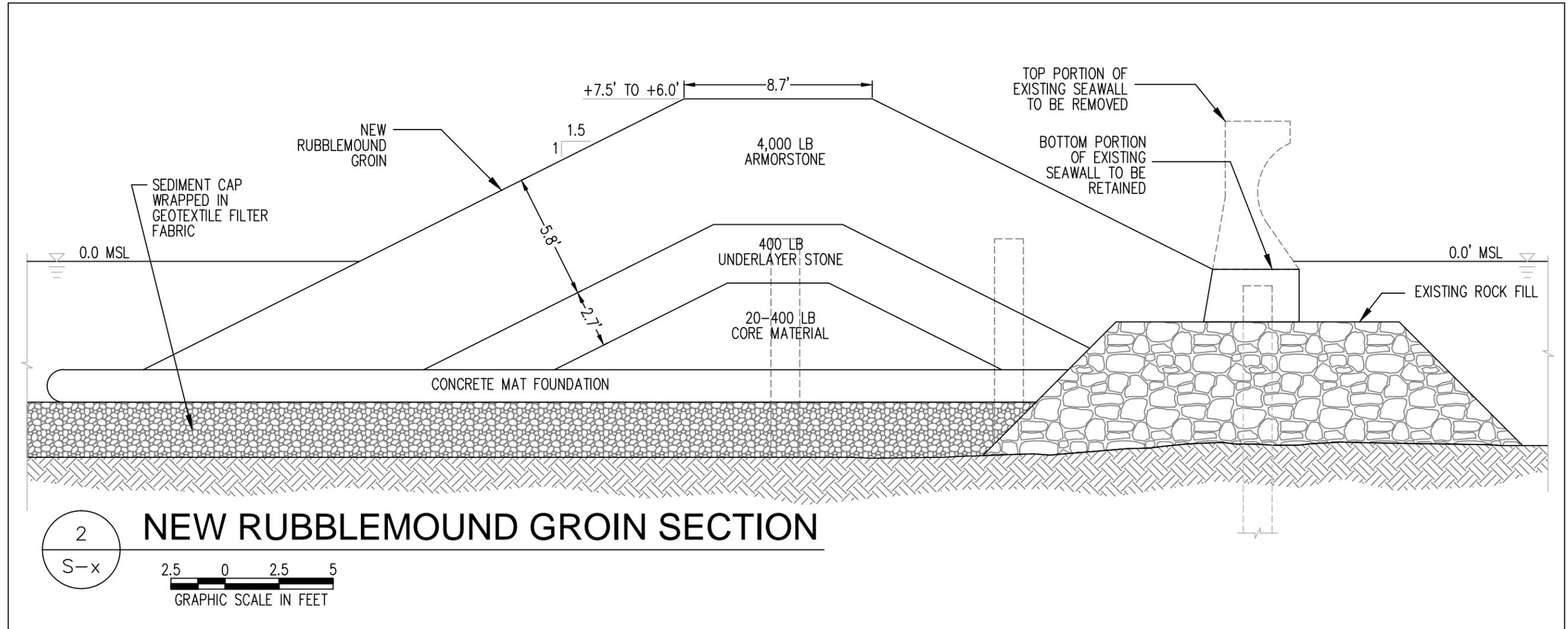


Figure 8: New Diamond Head Rubblemound Groin Section

(Page Intentionally Left Blank)



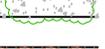
Figure 9: Replica Memorial Arch

(Page Intentionally Left Blank)

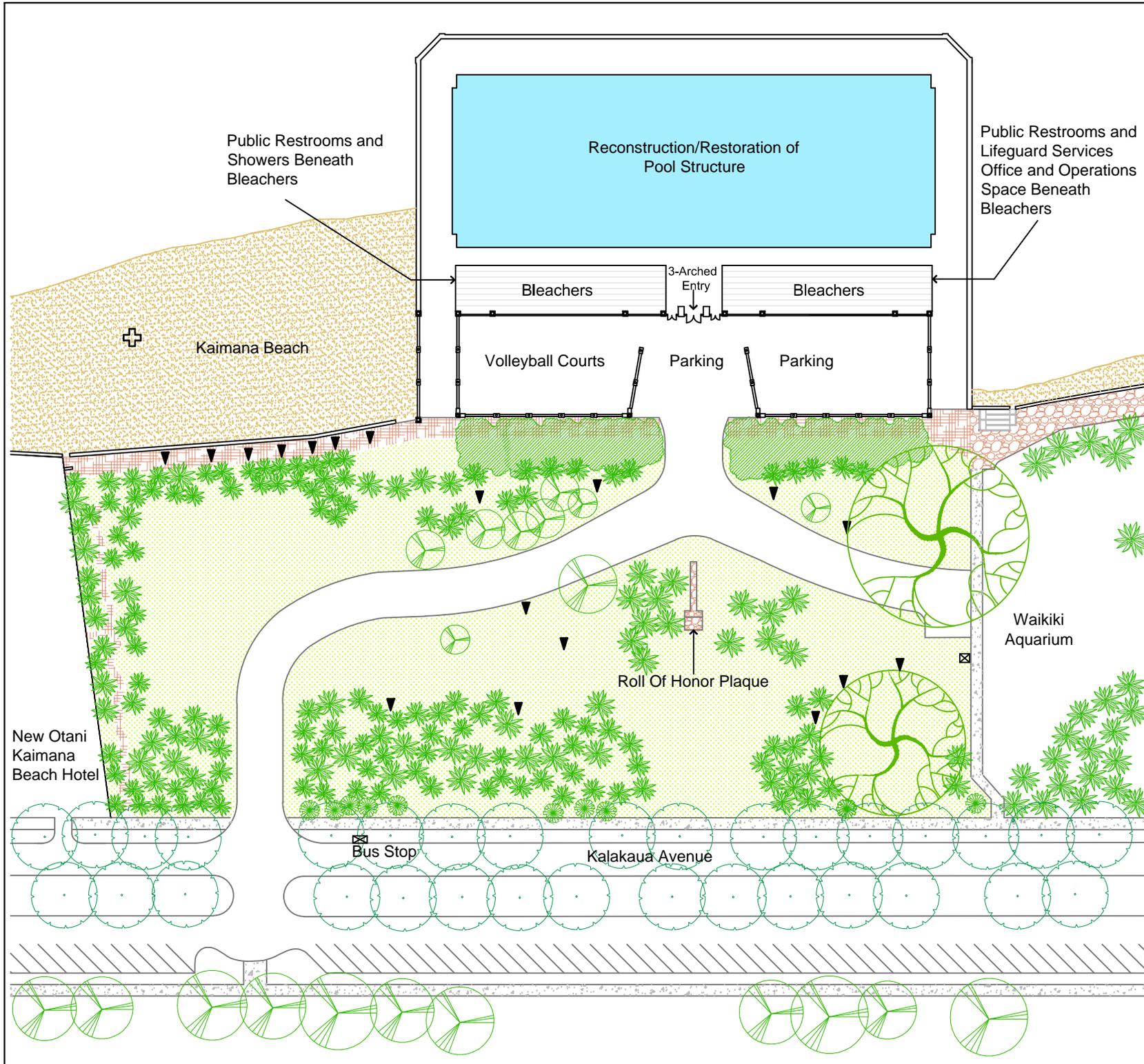
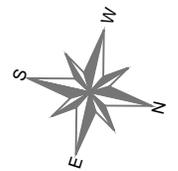
Waikiki War Memorial Complex

Figure 10: Alternative 1

LEGEND

-  Exceptional Banyan Tree
-  Ironwood Tree
-  Existing Tree (representative)
-  Coconut Tree
-  Palm Tree
-  Hau Trees
-  Public Sidewalk
-  Paved Walkway
-  Unpaved Walkway
-  Lifeguard Stand (location approximate)
-  Benches/ Picnic Tables (location approximate)

June 2014



(Page Intentionally Left Blank)

Appendix A

Early Consultation Distribution List and Comment Letters

Consulted Party	Distribution	Response Received
Federal Agencies		
National Park Service, National Register of Historic Places	●	
Dept. of the Interior, Geological Survey Pacific Islands Water Science Center	●	●
Dept. of the Interior, Fish and Wildlife Service Pacific Islands Office	●	●
Dept. of Commerce, National Marine Fisheries Service Pacific Islands Regional Office	●	
Dept. of the Army Army Corps of Engineers, Pacific Ocean Division, Regulatory Branch	●	
State Agencies		
Dept. of Agriculture	●	
Dept. of Accounting and General Services	●	●
Dept. of Business, Economic Development & Tourism	●	
DBEDT, Strategic Industries Division	●	
DBEDT Office of Planning	●	
DBEDT, Coastal Zone Management Program	●	●
DBEDT, Hawaii Tourism Authority	●	
Dept. of Defense	●	
Dept. of Hawaiian Home Lands	●	●
Dept. of Health, Environmental Health Administration Clean Water Branch	●	●
Dept. of Land & Natural Resources	●	
Division of State Parks		●
Division of Aquatic Resources		●
Engineering Division		●
Land Division – Oahu District		●
Division of Boating and Recreation		●
Division of Forestry and Wildlife		●
Dept. of Land & Natural Resources, Historic Preservation Division	●	
Dept. of Land & Natural Resources, Office of Conservation and Coastal Lands	●	●
Dept. of Transportation	●	●
University of Hawai‘i, Water Resources Research Center	●	
University of Hawai‘i, Environmental Center	●	
Office of Hawaiian Affairs	●	
City and County of Honolulu Agencies		
Board of Water Supply	●	●
Honolulu Fire Department	●	●
Honolulu Police Department	●	●
Dept. of Environmental Services	●	
Dept. of Facility Maintenance	●	●
Dept. of Planning and Permitting	●	●
Dept. of Parks and Recreation	●	●
Dept. of Transportation Services	●	●
Dept. of Emergency Services, Ocean Safety and Lifeguard Services Division	●	
Elected Officials		
Rep. Colleen Hanabusa, U.S. First Congressional District	●	
Senator Brian Schatz, U.S. Senate	●	
Senator Mazie Hirono, U.S. Senate	●	
Bertrand Kobayashi, State Representative District 19 (Diamond Head, Kapahulu)	●	
Scott Nishimoto State Representative District 21 (Kapahulu, McCully, Moiliili)	●	

Tom Brower, State Representative District 22 (Waikiki, Ala Moana)	●	
Sam Sлом, State Senatorial District 9 (Hawaii Kai to Diamond Head)	●	
Les Ihara, State Senatorial District 10 (Kaimuki to Ala Wai)	●	
Brickwood Galuteria, State Senatorial District 12 (Waikiki to Kakaako)	●	
Stanley Chang, City Council District 4 (Hawaii Kai to Ala Moana Beach Park)	●	
Ann Kobayashi, City Council District 5 (Kaimuki to Kakaako)	●	
Utilities		
Hawaiian Electric Company	●	●
Oceanic Time Warner Cable	●	
Hawaiian Telcom	●	
Neighborhood Boards		
Neighborhood Board No. 5 (Diamond Head, Kapahulu, St. Louis Hgts.)	●	●
Neighborhood Board No. 9 (Waikiki)	●	
Kapiolani Park Trust		
Stanley Chang	●	
Kymerly Marcos Pine	●	
Ernest Y. Martin	●	
Ikaika Anderson	●	
Ann Kobayashi	●	
Carol Fukunanga	●	
Joey Manahan	●	
Breene Harimoto	●	
Ron Menor	●	
Natorium Task Force Members and Public Attendees		
Historic Hawaii Foundation	●	●
New Otani Kaimana Beach Hotel	●	
Kaimana Beach Coalition	●	●
Waikiki Improvement Association	●	
Waikiki Aquarium	●	
University of Hawaii - Dept. of Geology and Geophysics School of Ocean and Earth Science Technology (Dr. Charles "Chip" Fletcher)	●	
Friends of the Natatorium	●	
World War II Filipino American Veterans	No address	
Korean War Veterans Association, Aloha Chapter	●	
Ken Ito, State Representative District 49	●	
Lt. General H.C. Stackpole	undeliverable letter	
Tim Guard	●	●
Edgar Hamasu	●	●
Brian Keaulana	●	
Hannie Anderson	●	
Ed Pskowski	●	
Mary Bowers	●	●
Carla von Wiegandt	●	●
Cory Kot	●	
Fred Trask	●	
Don Dymacea	undeliverable letter	
Mike Weidenbach	●	
Jill Byus Radke	undeliverable email	
Doug Codiga	●	
Marilyn Bornhorst	●	

Peter Apo	●	
Community Organizations		
National Trust for Historic Preservation	●	●
American Legion, Department of Hawaii	●	
Veterans of Foreign Wars, Department of Hawaii	●	
Waikiki Hawaiian Civic Club	●	
Waikiki Swim Club	●	
Waikiki Roughwater Swim Committee, Inc.	●	
AIA Honolulu	●	
The Nature Conservancy	●	
Kapiolani Park Preservation Society	●	
Surfrider Foundation, Oahu Chapter	●	
The Outdoor Circle	●	

(Page Intentionally Left Blank)



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Pacific Islands Water Science Center
677 Ala Moana Blvd., Suite 415
Honolulu, Hawaii 96813

Phone: (808) 587-2400/Fax: (808) 587-2401

May 13, 2014

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Subject: Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project
Environmental Impact Statement

Thank you for forwarding the subject Pre-Assessment Consultation Request for review and
comment by the staff of the U.S. Geological Survey Pacific Islands Water Science Center. We
regret however, that due to prior commitments and lack of available staff, we are unable to
review this document.

We appreciate the opportunity to participate in the review process.

Sincerely,

Handwritten signature of Stephen S. Anthony
Stephen S. Anthony
Center Director

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Steven S. Anthony, Center Director
U.S. Geological Survey – Pacific Islands Water Science Center
677 Ala Moana Boulevard, Suite 415
Honolulu, Hawaii 96813

Dear Mr. Anthony:

Subject: Pre-Assessment Consultation Request for the Waikiki War Memorial
Complex Project Environmental Impact Statement

The City and County of Honolulu, Department of Design and Construction,
thanks you for your letter dated May 13, 2014.

We acknowledge that due to prior commitments and lack of available staff, your
office was unable to review the subject documentation.

We appreciate your agency's participation in the environmental review process.
The draft EIS will be available for your review and comment when published.

Very truly yours,

Handwritten signature of Mark Yonamine
Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850



JUN 1 8 2014

In Reply Refer To:
2014-TA-0292

Mr. Derek Yasaka
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Subject: Technical Assistance for the Proposed Waikiki War Memorial Complex Project
Environmental Impact Statement in Honolulu, Oahu.

Dear Mr. Yasaka:

The U.S. Fish and Wildlife Service (Service) received your letter, dated April 30, 2014, in which you requested our comments on the preparation of an environmental impact statement (EIS) for the proposed Waikiki Memorial Complex Project in Honolulu, Hawaii. The proposed project involves the deconstruction of the existing natatorium and to create a memorial beach in its place. Alternatives considered are the restoration of the natatorium, or no action at all. The below comments are provided in accordance with section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*), as amended (ESA); the Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661 *et seq.*; 48 Stat. 401); and the Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712), as amended (MBTA).

We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity Mapping Program. There is no designated or proposed critical habitat under the ESA, or National Wildlife Refuges, wilderness areas, or wildlife preserves in the vicinity of the proposed project. However, our records indicate the federally endangered Hawaiian hoary bat (*Lasurus cinereus semotus*), and the endangered hawksbill turtle (*Eretmochelys imbricata*) and threatened green turtle (*Chelonia mydas*), collectively referred to as sea turtles, may occur within the project vicinity. Hawaiian seabirds (e.g., White fairy Terns (*Gygis alba*) and wedge-tailed shearwater (*Puffinus pacificus*), protected under the MBTA, may also occur in the project area. In addition, the endangered Hawaiian monk seal (*Monachus schauinslandi*) may use beach habitat in the vicinity of the proposed project. The National Marine Fisheries Service (NMFS) is the Federal agency that consults on potential impacts to monk seals, both in their on-shore and ocean habitats. Therefore, we did not review the proposed project for potential project impacts to monk seals. We recommend that you contact NMFS regarding the presence of monk seals in the area and potential impacts to the species from the project.



Mr. Derek Yasaka

2

Because the preferred alternative and alternative 1 (restoration) have the potential to negatively impact the marine and coastal environment within and surrounding the project area, we suggest incorporating the below information into your draft EIS:

The Hawaiian hoary bat roosts in both exotic and native woody vegetation and, while foraging, will leave young unattended in "nursery" trees and shrubs when they forage. If trees or shrubs suitable for bat roosting are cleared during the breeding season, there is a risk that young bats could inadvertently be harmed or killed. To minimize impacts to the endangered Hawaiian hoary bat, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed during the bat birthing and pup rearing season (June 1 through September 15). Site clearing should be timed to avoid disturbance to Hawaiian hoary bats in the project area.

To minimize and avoid artificial lighting impacts to sea turtles and seabirds, a comprehensive lighting plan should be developed and incorporated into the project description. If lights cannot be eliminated due to safety or security concerns then they should be positioned low to the ground, be motion-triggered and be shielded and/or full cut-off. Effective light shields should be completely opaque, sufficiently large, and positioned so that the bulb is only visible from below and so that light from the shielded source cannot be seen from the beach. Construction activities should occur during daylight hours only. If tree trimming is part of your project, please examine all trees slated to be cut to determine if there are white fairy terns nesting in them. White fairy terns often nest in urban parks and residential areas from Hawaii Kai to Hickam Air Force Base. White fairy terns do not build nests, instead they lay a single egg directly on a ledge, tree branch, or other suitable location. The egg will hatch after approximately 35 days, after which it takes 45 days for the chick to be mature enough to leave the nest on its own. Signs that white fairy terns are present include accumulation of white feathers or white droppings underneath the tree.

The Service consults on sea turtles and their use of terrestrial habitats (beaches where nesting and/or basking is known to occur), whereas the National Marine Fisheries Service (NMFS) consults on sea turtles and their use of off-shore and open ocean habitats. We recommend that you consult with NMFS regarding the potential impacts from the proposed project to sea turtles in off-shore and open ocean habitats.

We also recommend that you include data on the coral reef resources within the project footprint, how the project may impact these resources, and how to manage the potential impacts to avoid and minimize their effects in your proposed environmental impact statement.

If alterations to the landscape are part of your plan, please consider the fact that Hawaii's native ecosystems are heavily impacted by exotic invasive plants. Whenever possible we recommend using native plants for landscaping purposes. If native plants do not meet the landscaping objectives, we recommend choosing species that are thought to have a low risk of becoming invasive. The following websites are good resources to use when choosing landscaping plants: Pacific Island Ecosystems at Risk (<http://www.hear.org/Pier/>), Hawaii-Pacific Weed Risk Assessment (http://www.botany.hawaii.edu/faculty/daehler/wra/full_table.asp) and Global Compendium of Weeds (www.hear.org/gcw).

Mr. Derek Yasaka

3

Because the proposed activities may cause soil erosion and sedimentation into the marine environment, we are attaching the Service's recommended Best Management Practices regarding sedimentation and erosion in aquatic environments. We encourage you to incorporate the relevant practices into your project design.

We appreciate your efforts to conserve endangered species. If you have any questions concerning these recommendations please contact Carrie Harrington, Fish and Wildlife Biologist (phone: 808-792-9400; fax: 808-792-9581).

Sincerely,



Vickie Caraway
Acting Assistant Field Supervisor:
Oahu, Kauai, NWHI, Am. Samoa

Enclosure: Service BMPs for erosion and sediment control

U.S. Fish and Wildlife Service Recommended Standard Best Management Practices

The U.S. Fish and Wildlife Service (USFWS) recommends the following measures to be incorporated into project planning to avoid or minimize impacts to fish and wildlife resources. Best Management Practices (BMPs) include the incorporation of procedures or materials that may be used to reduce either direct or indirect negative impacts to aquatic habitats that result from project construction-related activities. These BMPs are recommended in addition to, and do not over-ride any terms, conditions, or other recommendations prepared by the USFWS, other federal, state or local agencies. If you have questions concerning these BMPs, please contact the USFWS Aquatic Ecosystems Conservation Program at 808-792-9400.

1. Authorized dredging and filling-related activities that may result in the temporary or permanent loss of aquatic habitats should be designed to avoid indirect, negative impacts to aquatic habitats beyond the planned project area.
2. Dredging/filling in the marine environment should be scheduled to avoid coral spawning and recruitment periods, and sea turtle nesting and hatching periods. Because these periods are variable throughout the Pacific islands, we recommend contacting the relevant local, state, or federal fish and wildlife resource agency for site specific guidance.
3. Turbidity and siltation from project-related work should be minimized and contained within the project area by silt containment devices and curtailing work during flooding or adverse tidal and weather conditions. BMPs should be maintained for the life of the construction period until turbidity and siltation within the project area is stabilized. All project construction-related debris and sediment containment devices should be removed and disposed of at an approved site.
4. All project construction-related materials and equipment (dredges, vessels, backhoes, silt curtains, etc.) to be placed in an aquatic environment should be inspected for pollutants including, but not limited to; marine fouling organisms, grease, oil, etc., and cleaned to remove pollutants prior to use. Project related activities should not result in any debris disposal, non-native species introductions, or attraction of non-native pests to the affected or adjacent aquatic or terrestrial habitats. Implementing both a litter-control plan and a Hazard Analysis and Critical Control Point plan (HACCP – see <http://www.haccp-nrm.org/Wizard/default.asp>) can help to prevent attraction and introduction of non-native species.
5. Project construction-related materials (fill, revetment rock, pipe, etc.) should not be stockpiled in, or in close proximity to aquatic habitats and should be protected from erosion (e.g., with filter fabric, etc.), to prevent materials from being carried into waters by wind, rain, or high surf.
6. Fueling of project-related vehicles and equipment should take place away from the aquatic environment and a contingency plan to control petroleum products accidentally spilled during the project should be developed. The plan should be retained on site with the person responsible for compliance with the plan. Absorbent pads and containment booms should be stored on-site to facilitate the clean-up of accidental petroleum releases.
7. All deliberately exposed soil or under-layer materials used in the project near water should be protected from erosion and stabilized as soon as possible with geotextile, filter fabric or native or non-invasive vegetation matting, hydro-seeding, etc.

TAKE PRIDE[®]
IN AMERICA 

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Vickie Caraway, Acting Assistant Field Supervisor
U. S. Fish and Wildlife Service
Pacific Island Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850-0056

Dear Ms. Caraway:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*; 2014-TA-0292

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated June 18, 2014.

Your comments, provided in accordance with Section 7 of the Endangered Species Act (ESA) of 1973; the Fish and Wildlife Coordination Act (FWCA) of 1934; and the Migratory Bird Treaty Act (MBTA) of 1918, are summarized below and will be considered in the preparation of the Environmental Impact Statement (EIS):

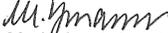
- There is no designated or proposed critical habitat under the ESA or National Wildlife Refuges, wilderness areas, or wildlife preserves in the vicinity of the proposed project.
- The federally endangered Hawaiian hoary bat (*Lasurus cinereus semotus*), the endangered hawksbill turtle (*Eretmochelys imbricate*), and the threatened green turtle (*Chelonia mydas*) may occur within the project vicinity.
- Hawaiian seabirds, including the white fairy Tern (*Gygis alba*) and wedge-tailed shearwater (*Puffinus pacificus*), protected under the MBTA, may also occur in the project area.
- The endangered Hawaiian monk seal (*Monachus schauinslandi*) may also use beach habitat in the vicinity of the proposed project, and the USFWS recommends the National Marine Fisheries Service (NMFS) be contacted in this regard. Similarly the NMFS should be contacted regarding potential impacts to sea turtles and their use of off-shore and open ocean habitat.

Ms. Vickie Caraway
July 9, 2014
Page 2

In addition to the above comments we thank you for the information and resources (including USFWS Recommended Standard Best Management Practices) you provided and suggested for incorporation into the EIS, regarding potential impacts to the Hawaiian hoary bat, sea turtles, sea birds, corals, native vegetation, coral communities, and the marine environment.

We very much appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

Dean H. Seki
Comptroller
Marla E. Zielinski
Deputy Comptroller

MAY - 8 2014

(P)1157.4

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Subject: Pre-Assessment Consultation Request for the
Waikiki War Memorial Complex Project
Environmental Impact Statement

Thank you for the opportunity to provide comments for pre-assessment consultation for the subject property. The proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities, and we have no comments to offer at this time.

If you have any questions, your staff may call Ms. Gayle Takasaki of the Public Works Division at 586-0500.

Sincerely,

DEAN H. SEKI
Comptroller

c: Mr. Chris Takashige, Director, Department of Design and Construction
Mr. Clifford Lau, Chief Facilities Division, Department of Design and Construction

Mr. Dean H. Seki, Comptroller
Department of Accounting and General Services
State of Hawaii
P.O. Box 119
Honolulu, Hawaii 96810-0119

Dear Mr. Seki:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 8, 2014.

We acknowledge that the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities and that your office has no comments to offer at this time.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,

Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.



**OFFICE OF PLANNING
STATE OF HAWAII**

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov/>

NEIL ABERCROMBIE
GOVERNOR

LEO R. ASUNCION
ACTING DIRECTOR
OFFICE OF PLANNING

Ref. No. P-14397

May 27, 2014

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Subject: Pre-Assessment Consultation Request for the Waikiki War Memorial
Complex Project Environmental Impact Statement, Honolulu, Oahu, Hawaii

Thank you for the opportunity to provide comments on the Waikiki War Memorial
Complex Project. We have reviewed the documents you submitted to us by letter dated April 29,
2014, and have the following comments to offer:

1. The Office of Planning is the lead agency for the Hawaii Coastal Zone Management (CZM) Program. The coastal zone management area is defined as "all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the United States territorial sea" see HRS § 205A-1 (definition of "coastal zone management area"). The Draft Environmental Impact Statement (Draft EIS) should include a discussion of the proposed project's ability to meet the objectives and policies set forth in HRS § 205A-2. These objectives and policies include: recreational resources, historic resources, scenic and open space resources, coastal ecosystems, economic uses, coastal hazards, managing development, public participation, and marine resources.
2. The Draft EIS should include the Coastal Zone Management Act, HRS Chapter 205A, in a list of "relationships to land use plans, policies, and controls."
3. In the Draft EIS, please provide a list of any Federal, State, or county permits required for this project.
4. A federal consistency review by the Hawaii CZM Program might be required since this project may require a Clean Water Act Section 404 permit from the United States Army Corps of Engineers. If other federal permits are required, then CZM federal consistency review may also be required for those permits.

Mr. Derek Yasaka, President
May 27, 2014
Page 2

5. This project lies within the Special Management Area (SMA) delineated by the City and County of Honolulu. The planning departments of the various county administrations are charged with assessing the requirements for SMA use and Shoreline Setback Variances. Please contact the City's Department of Planning and Permitting to obtain a determination on where the project lies within the designated SMA, and whether a SMA permit and/or a shoreline variance are required for this project.

If you have any questions regarding this comment letter, please contact Josh Hekekia of our Hawaii CZM Program at 587-2845.

Sincerely,

Leo R. Asuncion
Acting Director

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Leo R. Asuncion, Jr., Acting Director
Office of Planning
State of Hawaii
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Dear Mr. Asuncion:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 27, 2014.

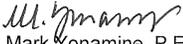
Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- A federal consistency review by the Hawaii Coastal Zone Management (CZM) Program may be required since the project will need a Clean Water Act Section 404 Permit from the United States Army Corps of Engineers and/or other federal permits.
- The Draft EIS should include a discussion of the proposed project's ability to meet the objectives and policies set forth in HRS, Chapter 205A-2, which include recreational resources, historic resources, scenic and open space resources, coastal ecosystems, marine resources, coastal hazards, economic uses, public participation, and managing development.
- The Draft EIS should include the CZM Act, HRS Chapter 205A, in its list of "relationship to land use plans, policies, and controls" and provide a list of any Federal, State, or County permits required for the project.
- The project lies within the Special Management Area (SMA) delineated by the City and County of Honolulu. The City's Department of Planning and Permitting should be contacted to determine whether a SMA permit and/or a shoreline variance are required for the subject project.

Mr. Leo R. Asuncion, Jr.
July 9, 2014
Page 2

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR
STATE OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS
P. O. BOX 1879
HONOLULU, HAWAII 96805

May 5, 2014

JOHIE M. K. MASAGATANI
CHAIRMAN
HAWAIIAN HOMES COMMISSION

DARRELL T. YOUNG
DEPUTY TO THE CHAIRMAN

KIRK CALDWELL
MAYOR



DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

WCP Inc.
Attn: Mr. Derek Yasaka, President
99-061 Koaha Way, Suite 208
Aiea, Hawaii'i 96701

Dear Mr. Yasaka:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project* Environmental Impact Statement

Thank you for the opportunity to review the subject Pre-Assessment Consultation. The Department of Hawaiian Home Lands has no comment to offer at this time, but recommends to consult with our O'ahu Homestead Associations that includes:

- Kewalo Hawaiian Homestead Community Association
- Papakolea Community
- Papakolea Community Development Corporation
- Kalawahine Streamside Association

If you have any questions, please contact our Planning Office at 620-9480.

Aloha,

Marvin Kaleo Manuel,
Acting Planning Program Manager

cc: Chris Takashige, Director, Department of Design and Construction
Clifford Lau, Chief Facilities Division, Department of Design and Construction

Mr. Marvin Kaleo Manuel, Acting Planning Program Manager
Department of Hawaiian Homelands
State of Hawaii
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Mr. Manuel:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project* Environmental Impact Statement

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 5, 2014.

We acknowledge that your office has no comments to offer at this time, but recommends consultation with your Oahu Homestead Associations that may be affected by the proposed project.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,

Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



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

May 6, 2014

Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

SUBJECT: Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter dated April 29, 2014. Thank you for allowing us to review and comment on the subject document. The document was routed to the relevant Environmental Health divisions and offices. They will provide specific comments to you if necessary. EPO recommends that you review the standard comments at: <http://health.hawaii.gov/epo/home/landuse-planning-review-program/>. You are required to adhere to all applicable standard comments.

You may also wish to review the recently revised Water Quality Standards Maps that have been updated for all islands. The new Water Quality Standards Maps (2013) can be found at: <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/water-quality-standards/>

The EPO suggests that you carefully review the U.H., School of Ocean and Earth Science and Technology site www.soest.hawaii.edu and in particular, their predictions for sea level rise in the project area.

EPO also recommends you examine the many sources available on strategies to support sustainability including:
State of Hawaii, Office of Planning: www.planning.hawaii.gov and the 2013 ORMP;
U.S. Health and Human Services: www.hhs.gov/about/sustainability; and
U.S. Environmental Protection Agency's sustainability programs: www.epa.gov/sustainability.

The DOH encourages everyone to apply these sustainability strategies and principles early in the planning and review of projects. We also request that for future projects you consider conducting a Health Impact Assessment (HIA). More information is available at: www.cdc.gov/healthyplaces/hia.htm; and www.epa.gov/research/healthscience/health-impact-assessment.htm.

We request you share all of this information with others to increase community awareness on sustainable, innovative, inspirational, and healthy community design.
Mahalo,

Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

c: Clean Water Branch

LINDA ROSEN, M.D., M.P.H.
DIRECTOR OF HEALTH

In reply, please refer to:
File:
EPO 14-071
EIS Waikiki War Memorial

KIRK CALDWELL
MAYOR

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Laura Leialoha Phillips McIntyre, Program Manager
Department of Health
State of Hawaii
Environmental Planning Office
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Ms. Phillips McIntyre:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 6, 2014.

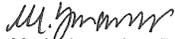
We acknowledge that the State Department of Health, Environmental Planning Office (EPO), has no comments to offer at this time. However, EPO has routed the subject documentation to the relevant Environmental Health divisions and offices which will provide specific comments if necessary. We note that EPO also recommends reviewing online resources available at the EPO website, as well as the websites of the State Department of Health Clean Water Branch, the University of Hawaii School of Ocean and Earth Science Technology (particularly pertaining to sea level rise), the State Office of Planning, the U.S. Health and Human Services, and the U.S. Environmental Protection Agency.

In addition, EPO recommends application of sustainable strategies and principles during project planning and review, consideration of health impact assessments, and sharing of project information with the community.

Ms. Laura Leialoha Phillips McIntyre
July 9, 2014
Page 2

We appreciate your agency's participation in the environmental review process.
The draft EIS will be available for your review and when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



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

LINDA ROSEN, M.D., M.P.H.
DIRECTOR OF HEALTH

In reply, please refer to:
EMDCWB

05025PCTM.14

May 15, 2014

Mr. Derek Yasaki
President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaki:

**SUBJECT: Comments on the Pre-Assessment Consultation Request for the
Waikiki War Memorial Complex Project
Waikiki, Island of Oahu, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated April 29, 2014, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: http://health.hawaii.gov/epo/files/2013/10/CWB_Oct22.pdf

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. National Pollutant Discharge Elimination System (NPDES) permit coverage is required for pollutant discharges into State surface waters and for certain situations involving storm water (HAR, Chapter 11-55).

Mr. Derek Yasaki
May 15, 2014
Page 2

05025PCTM.14

- a. Discharges into Class 2 or Class A State waters can be covered under an NPDES general permit only if all of the NPDES general permit requirements are met. Please see the DOH-CWB website (<http://health.hawaii.gov/cwb/>) for the NPDES general permits and instructions to request coverage.
- b. All other discharges into State surface waters and discharges into Class 1 or Class AA State waters require an NPDES individual permit. To request NPDES individual permit coverage, please see the DOH-CWB forms website located at: <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/forms/>
- c. NPDES permit coverage for storm water associated with construction activities is required if your project will result in the disturbance of one (1) acre or more of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. NPDES permit coverage is required before the start of the construction activities.

Land disturbance includes, but is not limited to clearing, grading, grubbing, uprooting of vegetation, demolition (even if leaving foundation slab), staging, stockpiling, excavation into pavement areas which go down to the base course, and storage areas (including areas on the roadway to park equipment if these areas are blocked off from public usage, grassed areas, or bare ground).

3. If your project involves work in, over, or under waters of the United States, it is highly recommend that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 438-9258) regarding their permitting requirements.

Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

Mr. Derek Yasaki
May 15, 2014
Page 3

05025PCTM.14

If you have any questions, please visit our website at: <http://health.hawaii.gov/cwb/>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,



ALEC WONG, P.E., CHIEF
Clean Water Branch

CTM:tg

c: DOH-EPO #14-071 [via email only]

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Alec Wong, P.E., Chief
Department of Health
State of Hawaii
Clean Water Branch
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Wong:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 15, 2014.

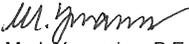
Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- The project and its potential impacts to State waters must meet criteria of the anti-degradation policy (HAR, Section 11-54-1-1), designated uses (HAR, Section 11-5-3), and water quality (HAR, Sections 11-54-4 through 11-54-8).
- National Pollutant Discharge Elimination System (NPDES) permit coverage is required for pollutant discharges into State surface waters and for certain situations involving storm water in accordance with HAR, Chapter 11-55.
- Pursuant to the Clean Water Act, Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) will be required for construction and/or operation activities.
- All discharges related to project construction or operation activities, whether or not a NPDES and/or 401 WQC are required, must comply with the State's Water Quality Standards.

Mr. Alec Wong
July 9, 2014
Page 2

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL
RESOURCES

DIVISION OF STATE PARKS
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 12, 2014

WILLIAM J. AHL, JR.
COMMISSIONER
DEPARTMENT OF LAND AND NATURAL RESOURCES
ESTHER KIA'AINA
DEPUTY COMMISSIONER
WILLIAM AL FANI
DEPUTY DIRECTOR - WATER
ADRIAN BRESNAHAN
DEPUTY DIRECTOR - STATE PARKS
HERIOTI C. CROFT-YAMEN
COMMISSIONER OF WATER RESOURCES MANAGEMENT
TERRYVALENT AMELI'UANAN I. MOSES
COMMISSIONER OF LAND RESOURCES MANAGEMENT
TIMOTHY H. DING
DIRECTOR - STATE PARKS
TIMOTHY AND WENDY
DIRECTOR - STATE PARKS
LAND AND WATER RESOURCES MANAGEMENT
LAND
STATE PARKS

KIRK CALDWELL
MAYOR

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 9, 2014

570464

MEMORANDUM

To: Russell Y. Tsuji, Administrator
Land Division

From: Daniel S. Quinn, State Parks Administrator *[Signature]*

Subject: Pre-Assessment Consultation for the Waikiki War Memorial Complex Project EIS, Dept. of Design and Construction, City and County of Honolulu

We would like to express our support for the preferred alternative resulting in the demolition of the salt water pool, and replacing the area with a new public beach with a parking lot, restrooms and showers. The War Memorial arch will be reconstructed and located closer to the Roll of Honor plaque that is already in place. Based on studies completed over the years, this alternative appears to be the most practical and sustainable use of the area and its resources. We note that both Governor Abercrombie and Mayor Caldwell are in support of this alternative which is also economically feasible.

We wish to be a consulted party, upon completion of the EIS. Thank you for the opportunity to provide comments.

Mr. Daniel S. Quinn, Administrator
Division of State Parks
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 310
Honolulu, Hawaii 96813

Dear Mr. Quinn:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your response to the subject request dated May 12, 2014.

We acknowledge that the State Department of Land and Natural Resources, Division of State Parks, expresses support for the Preferred Alternative (creation of a war memorial beach) based upon the following:

- The Preferred Alternative appears to be the most practical and sustainable use of the area and its resources based on studies conducted over the years.
- Both Governor Abercrombie and Mayor Caldwell are in support of the Preferred Alternative which is also economically feasible.

We appreciate your agency's participation in the environmental review process, and we note that you wish to be a consulted party upon completion of the EIS. The draft EIS will be available for your review and comment when published.

Very truly yours,
[Signature]
Mark Yonamine, P.E.
Acting Director

MY:li
cc: WCP Inc.

RECEIVED
LAND DIVISION
2014 MAY 13 PM 2:12
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



RECEIVED
LAND DIVISION

2014 MAY 21 PM 2:42

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSIONER OF WATER RESOURCES MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809



DAR #4968

May 6, 2014

MEMORANDUM

TO: **DLNR Agencies:**
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division – Oahu District
 Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement

LOCATION: Waikiki War Memorial Complex area of Kapiolani Regional Park, Waikiki

APPLICANT: City and County of Honolulu – Department of Design and Construction, by its consultant WCP Inc.

JK ✓
AT, JK, PM

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document.

Please submit any comments by May 29, 2014. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed:
 Print Name: FRAZER MCGILVRAY
 Date: 5-20-14

Date: 05-19-14
DAR #4968

MEMORANDUM

TO: Frazer McGilvray, Administrator
 DATE: 05-20-14
 FROM: Annette Tagawa, Aquatic Biologist
 Paul Murakawa, Aquatic Biologist
 Jo-Anne Kushima, Aquatic Biologist

SUBJECT: Pre-Assessment Consultation Request for Waikiki War Memorial Complex EIS

Comment	Date Request	Receipt	Referral	Due Date
	05-06-14	05-07-14	05-08-14	05-29-14

Requested by: DLNR/Land Div. (Russell Tsuji)

Summary of Proposed Project

Title: Pre-Assessment Consultation Request
Waikiki War Memorial Complex EIS

Project by: City & County of Honolulu, Department of Design & Construction
Consultant WCP, Inc.

Location: Waikiki War Memorial Complex Area
of Kapiolani Regional Park, Waikiki

Brief Description: The City and County of Honolulu Department of Design and Construction proposes to undertake a series of improvements to the Waikiki War Memorial Complex (WWMC) area of the Kapiolani Regional Park. The applicant proposes alternatives for improvements to address determining the final disposition of the Natatorium in order to remedy its current deteriorated and disfigured condition, as well as address the public safety and health risks posed by the structure's current deteriorated condition, renew the Memorial to World War I veterans, and fully reopen the Kapiolani Regional Park to the public.

Comments: The Division of Aquatic Resources (DAR) agrees that the present deteriorated condition of the WWMC needs to be addressed. The City's preferred alternative proposes creation of a new beach situated at the present site of the Natatorium. The new beach will be fronted by a replica World War I Memorial Arch that aligns with the existing Roll of Honor plaque and hau tree arbor. Also included in the preferred alternative are additional park improvements; i.e. construction of a new bathhouse, removal of the internal roadway and construction of a consolidated parking lot. The

preferred alternative appears to provide more benefits to the public; i.e. easier access and less maintenance costs to the City than Alternative 1, which proposes to reconstruct and restore the Natatorium.

DAR's concerns center on impacts to aquatic resources and the aquatic environment in the project area; i.e. 1) foreign material and sedimentation entering the water as a result of construction during all phases of the project; i.e. during demolition of the deteriorated structure and removal of material resulting from the demolition, 2) negative impacts resulting from sand and rubble accumulation at the entrance of the beach and along the shore, and 3) negative impacts from changes in water and current movement resulting from the wall enclosure structure and jetties (shown on the proposed plan) extending into the water on each side of the entrance to the new beach that opens up to the ocean.

The material that was provided for this review consisted of sketches for the 3 alternatives being considered for improving the Waikiki War Memorial Complex. As the Final Environmental Assessment/Environmental Impact Statement Preparation Notice (FEA/EISPN) is prepared, additional information including but not limited to an in-water site/biological survey to inventory the resources and their habitat such as the species of fish, invertebrates (including coral) and algae (limu) present in the area of the proposed construction site needs to be included. The data collected during the biological survey and included in the FEA/EISPN should quantify resource densities in numbers and/or percent coverage and the presence of rare and/or endemic species or species of concern observed in the project area.

Safety issues associated with the Beach Retention Structures also need to be addressed in the FEA/EISPN as the public will consider taking advantage of the wall enclosures and jetties constructed for the new beach to improve opportunities for viewing the ocean, taking pictures, and fishing activities.

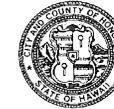
DAR recommends that the details for Best Management Practices (BMPs) and mitigation measures addressing both long and short term adverse impacts during all phases of the Waikiki War Memorial Complex improvement project be discussed and included in the FEA/EISPN. These practices include but are not limited to measures such as those for addressing demolition, removal of material, measures for preventing material and sediment from entering and impacting aquatic resources and the aquatic habitat in the project area.

Thank you for providing DAR the opportunity to review and comment on the proposed project. DAR requests the opportunity to review and provide comments on the FEA/EISPN for this project when it is completed and available for review and comment.

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Frazer McGilvray, Administrator
Division of Aquatic Resources
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 330
Honolulu, Hawaii 96813

Dear Mr. McGilvray:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your response to the subject request dated May 20, 2014.

Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- The Division of Aquatic Resources (DAR) notes that the Preferred Alternative—creation of a war memorial beach—appears to provide more benefits to the public in terms of easier access and less maintenance costs than Alternative 1, reconstruction of the Natatorium.
- DAR's concerns center on impacts to aquatic resources and the aquatic environment in the project area including: 1) sedimentation and foreign materials entering water as a result of construction activities; 2) potential impacts resulting from sand and rubble accumulation at the entrance of the new beach and along the shore; and 3) potential impacts resulting from changes in water and current movement resulting from the proposed retention structures and jetties.
- As part of the EIS effort, additional information including but not limited to an in-water biological survey should be conducted to inventory the resources (e.g., fish, invertebrates, coral, and algae) and their habitat in the area of the proposed construction site.

Mr. Frazer McGilvray
July 9, 2014
Page 2

- Data collected during the biological survey should quantify resource densities and/or percentage coverage as well as the presence of any rare and/or endemic species in the project area.
- The FEA/EISPN should address public safety issues associated with the beach retention structures as the public may use the proposed structures to view the ocean, take pictures, or fish.
- DAR recommends details for Best Management Practices (BMPs) and mitigation measures addressing both long- and short-term adverse impacts during construction-related activities are included in the FEA/EISPN.

Please note that at the present time conceptual planning and design of the Proposed Action and alternatives are still being developed. As such, comprehensive design/engineering information, potential impacts, environmental surveys, and/or BMPs are not yet available for incorporation in the FEA/EISPN. However, as the alternatives development advances through the environmental review process these items will be incorporated and addressed in the subsequent draft EIS.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 6, 2014

MEMORANDUM

TO: FR

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

TO:
FROM:

Russell Y. Tsuji, Land Administrator
SUBJECT: Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement

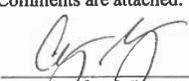
LOCATION: Waikiki War Memorial Complex area of Kapiolani Regional Park, Waikiki
APPLICANT: City and County of Honolulu – Department of Design and Construction, by its consultant WCP Inc.

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document.

Please submit any comments by May 29, 2014. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: 
Print Name: Cary B. Cheng, Chief Engineer
Date: 5/27/14

WILLIAM J. AHL, JR.
CHAIRMAN
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RECEIVED
LAND DIVISION
MAY 9 11 48
14MAY06PH0246 ENGINEERING

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji

Ref.: Pre-Assessment Consultation Request for the EIS for the Waikiki War Memorial Complex Hawaii.031

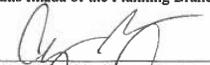
COMMENTS

- () We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone _____.
- (X) Please take note that the project site according to the Flood Insurance Rate Map (FIRM), is located in Zones VE and AE. The National Flood Insurance Program regulates developments within these zones as indicated in bold letters below.
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is _____.
- (X) Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

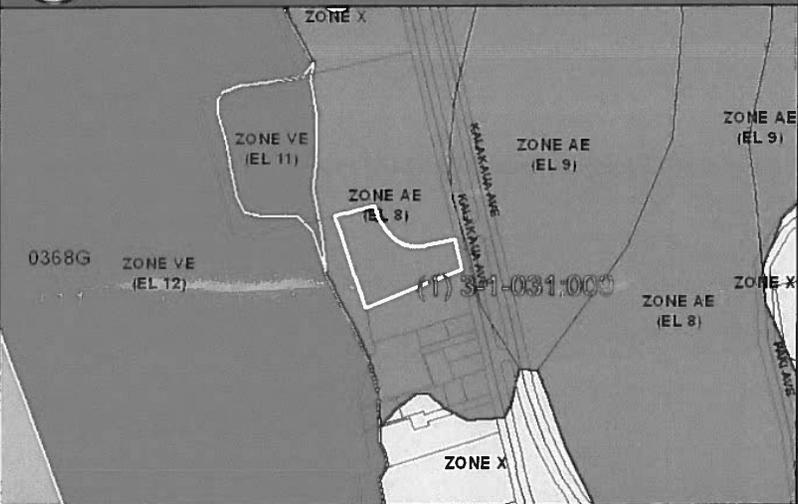
- (X) Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
- () Mr. Frank DeMarco at (808) 961-8042 of the County of Hawaii, Department of Public Works.
- () Mr. Carolyn Cortez at (808) 270-7253 of the County of Maui, Department of Planning.
- () Mr. Stanford Iwamoto at (808) 241-4896 of the County of Kauai, Department of Public Works.
- () The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of any State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.
- () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.
- () Additional Comments: _____
- () Other: _____

Should you have any questions, please call Mr. Dennis Imada of the Planning Branch at 587-0257.

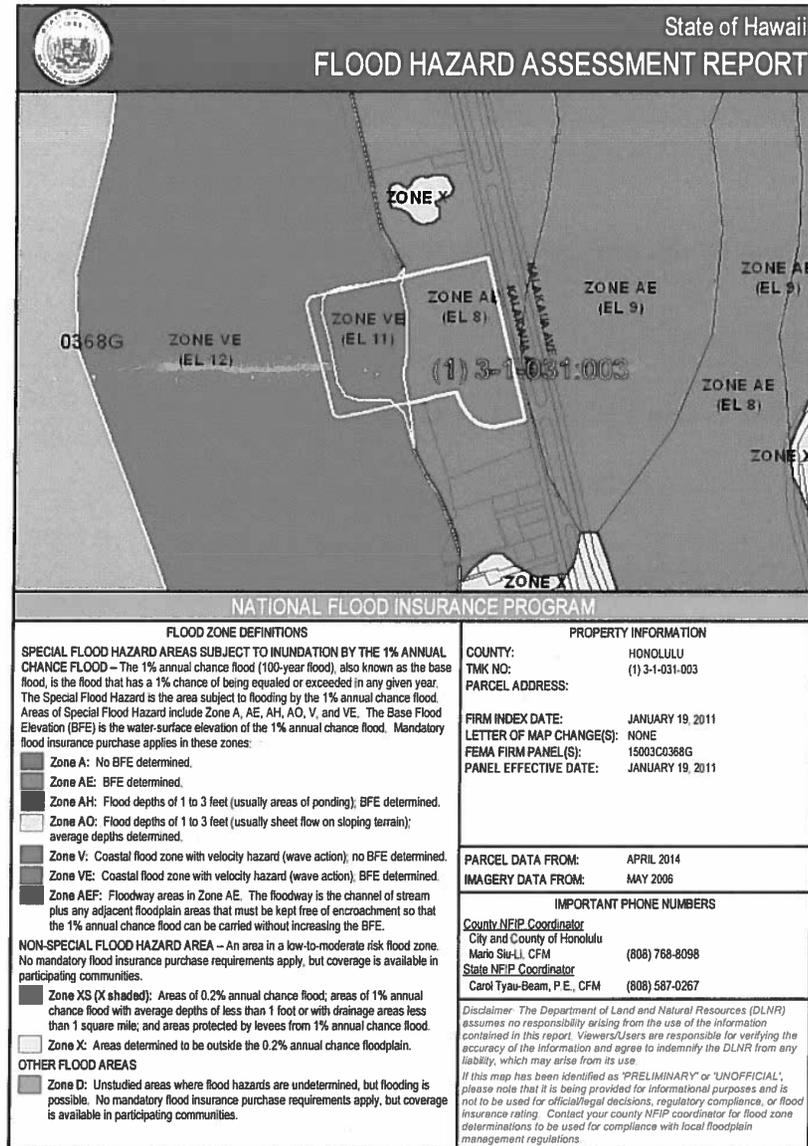
Signed: 
CARTY S. CHANG, CHIEF ENGINEER
Date: 5/8/14

State of Hawaii

FLOOD HAZARD ASSESSMENT REPORT



FLOOD ZONE DEFINITIONS	PROPERTY INFORMATION
<p>SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD – The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water-surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Zone A: No BFE determined. <input type="checkbox"/> Zone AE: BFE determined. <input type="checkbox"/> Zone AH: Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined. <input type="checkbox"/> Zone AO: Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. <input type="checkbox"/> Zone V: Coastal flood zone with velocity hazard (wave action), no BFE determined. <input type="checkbox"/> Zone VE: Coastal flood zone with velocity hazard (wave action); BFE determined. <input type="checkbox"/> Zone AEF: Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE. <p>NON-SPECIAL FLOOD HAZARD AREA – An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Zone XS (X shaded): Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood. <input type="checkbox"/> Zone X: Areas determined to be outside the 0.2% annual chance floodplain. <p>OTHER FLOOD AREAS</p> <ul style="list-style-type: none"> <input type="checkbox"/> Zone D: Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities. 	<p>COUNTY: HONOLULU TMK NO: (1) 3-1-031-009 PARCEL ADDRESS: 2815 KALAKAUA AVE HONOLULU, HI 96815 FIRM INDEX DATE: JANUARY 19, 2011 LETTER OF MAP CHANGE(S): NONE FEMA FIRM PANEL(S): 15003C0368G PANEL EFFECTIVE DATE: JANUARY 19, 2011</p> <hr/> <p>PARCEL DATA FROM: APRIL 2014 IMAGERY DATA FROM: MAY 2006</p> <hr/> <p style="text-align: center;">IMPORTANT PHONE NUMBERS</p> <p>County NFIP Coordinator City and County of Honolulu Mario Siu-Li, CFM (808) 768-8098 State NFIP Coordinator Carol Tyau-Beam, P.E., CFM (808) 587-0267</p> <hr/> <p><small>Disclaimer: The Department of Land and Natural Resources (DLNR) assumes no responsibility arising from the use of the information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the DLNR from any liability, which may arise from its use. If this map has been identified as "PRELIMINARY" or "UNOFFICIAL", please note that it is being provided for informational purposes and is not to be used for official/legal decisions, regulatory compliance, or flood insurance rating. Contact your county NFIP coordinator for flood zone determinations to be used for compliance with local floodplain management regulations.</small></p>



**DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Carty Chang, Chief Engineer
Engineering Division
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 221
Honolulu, Hawaii 96813

Dear Mr. Chang:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your response to the subject request dated May 2, 2014.

Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- The project site according to the Flood Insurance Rate Map is located in Zones VE and AE and the National Flood Insurance Program (NFIP) regulates developments within these zones. As such, the project must comply with the rules and regulations of the NFIP as presented in Title 44 of the Code of Federal Regulations.
- Local flood ordinances may be more restrictive than minimal NFIP standards, and if so, would take precedence. Questions regarding applicable local flood ordinances can be directed to the County NFIP Coordinator located at the City and County of Honolulu, Department of Planning and Permitting.

Mr. Carty Chang
July 9, 2014
Page 2

We appreciate your agency's participation in the environmental review process.
The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABREU ROMBER
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 421
HONOLULU, HAWAII 96809

May 6, 2014

MEMORANDUM

TO: 

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM: 

SUBJECT:  Russell Y. Tsuji, Land Administrator
Pre-Assessment Consultation Request for the Waikiki War Memorial
Complex Project Environmental Impact Statement
LOCATION: Waikiki War Memorial Complex area of Kapiolani Regional Park, Waikiki
APPLICANT: City and County of Honolulu – Department of Design and Construction, by
its consultant WCP Inc.

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document.

Please submit any comments by May 29, 2014. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: 
Print Name: William J. Aila, Jr.
Date: 5/14/14 

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Russell Y. Tsuji, Land Administrator
Land Division
Department of Land and Natural Resources
State of Hawaii
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Tsuji:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 29, 2014.

We acknowledge that the State Department of Land and Natural Resources (DLNR), Land Division, has no comments to offer at this time. Comments received from other DLNR divisions, forwarded through your office, have been replied to directly to the individual divisions.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEH. AHERI'OMIBI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 6, 2014

MEMORANDUM

TO: **DLNR Agencies:**
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division – Oahu District
 Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement

LOCATION: Waikiki War Memorial Complex area of Kapiolani Regional Park, Waikiki

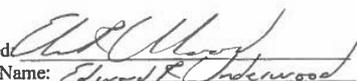
APPLICANT: City and County of Honolulu – Department of Design and Construction, by its consultant WCP Inc.

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document.

Please submit any comments by May 29, 2014. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: 
Print Name: Edward R. Underwood
Date: 5/9/14

WILLIAM J. AHL, JR.
CHAIRPERSON
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RECEIVED
LAND DIVISION
2014 MAY 12 PM 3:11
DEPT OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Edward Underwood, Administrator
Division of Boating and Ocean Recreation
Department of Land and Natural Resources
State of Hawaii
333 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Underwood:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your response to the subject request dated May 8, 2014.

We acknowledge that the State Department of Land and Natural Resources, Division of Boating and Ocean Recreation, has no comments to offer at this time.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 6, 2014

MEMORANDUM

TO: From

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM: To

Russell Y. Tsuji, Land Administrator
Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement

LOCATION:
APPLICANT:

Waikiki War Memorial Complex area of Kapiolani Regional Park, Waikiki
City and County of Honolulu – Department of Design and Construction, by its consultant WCP Inc.

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document.

Please submit any comments by May 29, 2014. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: 
Print Name: LISA HAMADA
Date: 5/20/14

WILLIAMS AILA, JR.
CHAIRMAN
BOARD OF LAND AND NATURAL RESOURCES
CHAIRMAN OF WATER RESOURCE MANAGEMENT

RECEIVED
LAND DIVISION
2014 MAY 22 AM 9:40
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Ms. Lisa Hadway, Administrator
Division of Forestry and Wildlife
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 325
Honolulu, Hawaii 96813

Dear Ms. Hadway:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your response to the subject request dated May 20, 2014.

We acknowledge that the State Department of Land and Natural Resources, Division of Forestry and Wildlife, has no comments to offer at this time.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

2014 MAY -6 P 3: 18

WILLIAM J. AILA, JR.
GOVERNOR
DEPARTMENT OF LAND AND NATURAL RESOURCES
OFFICE OF CONSERVATION & COASTAL LANDS
STATE OF HAWAII

MEMORANDUM

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator
SUBJECT: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*
LOCATION: Waikiki War Memorial Complex area of Kapiolani Regional Park, Waikiki
APPLICANT: City and County of Honolulu – Department of Design and Construction, by its consultant WCP Inc.

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document.

Please submit any comments by **May 29, 2014**. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: _____
Print Name: _____
Date: _____

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
OFFICE OF CONSERVATION AND COASTAL LANDS

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

WILLIAM J. AHL, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

JESSE K. SOUKI
VICE CHAIR

WILLIAM AL TAM
DEPUTY CHIEF OF BUREAU

AGIATE BISHOP'S
BOARDING AND CHAIRMAN OF
BUREAU OF CONSERVATION
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
COMMISSION ON LAND AND NATURAL RESOURCES

LAND DIVISION
HONOLULU, HAWAII 96809

RECEIVED
MAY 15 2015
LAND DIVISION
MAY 15 2015
MAY 15 2015

Correspondence OA-14-198

DLNR:OCCL:BR

Russell Y. Tsuji, Land Administrator
State of Hawaii
Department of Land and Natural Resources
Land Division
Post Office Box 621
Honolulu, Hawaii 96809

SUBJECT: Re: Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement

Dear Mr. Tsuji,

The Department of Land and Natural Resources (DLNR) Office of Conservation and Coastal Lands (OCCL) is responding to the April 29, 2014 Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement from WCP Inc., consultant for the City and County Department of Design and Construction (City), and offers the following comments.

The City is proposing improvements to the Waikiki War Memorial Complex (WWMC) area of Kapiolani Regional Park. The City will be preparing an Environmental Impact Statement (EIS, anticipated release spring 2015) for the proposed project.

The *Proposed Action* (Preferred Alternative) is construction of a new beach situated at the present site of the Natatorium at the WWMC. The City's letter included a preliminary conceptual rendering of the *Proposed Action* depicting a newly constructed beach with "beach retention structures" (groins) within the footprint of the existing Natatorium. The beach will be fronted by a replica World War I memorial arch with additional proposed park improvements.

The City's letter also provided two Alternatives to the Proposed Action to be evaluated in the EIS. *Alternative 1* is the reconstruction and restoration of the existing Natatorium structure with additional park improvements. *Alternative 2* is a no-action alternative for comparison of impacts.

The OCCL supports the *Proposed Action* of constructing a new beach within the footprint of the Natatorium. Historical erosion studies by researchers at the University of Hawaii show that hundreds of yards of beach have been lost to erosion and construction of seawalls along Waikiki over the past half-century, including along 250 yards of shoreline on the north (Ewa) side of the Natatorium. Kaimana Beach on the south (Diamond Head) side of the Natatorium is very

popular with both residents and visitors. Park users would benefit greatly from the proposed new beach area by offsetting some of the historical beach loss in this area.

We thank the City and their consultants, WCP Inc., for the opportunity to comment in the Pre-Assessment Consultation for the WWMC Project. We look forward to working closely with the City and their consultants in the restoration and improvement efforts at the WWMC. We ask that they please include OCCL in future meetings regarding beach improvements at the WWMC. Please also consider the OCCL as a resource for questions or concerns related to this project. The OCCL can be reached at (808) 587-0377.

Sincerely,

Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 131
Honolulu, Hawaii 96813

Dear Mr. Lemmo:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your response to the subject request dated May 5, 2014.

Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- The Office of Conservation and Coastal Lands (OCCL) supports the Preferred Alternative—creation of new war memorial beach—within the footprint of the existing Natatorium.
- Historical erosion studies show that hundreds of yards of beach have been lost to erosion and construction of sea wall structures along Waikiki over the past century, including 250 yards of shoreline on the Ewa side of the Natatorium.
- Kaimana Beach on the Diamond Head side of the Natatorium is very popular with both residents and visitors. Park users would benefit greatly from the proposed new beach by offsetting some of the historical beach loss in this area.

We appreciate your agency's participation in the environmental review process, and we note that OCCL would like to work with the City and be involved in the ongoing improvement efforts at the Waikiki War Memorial Complex. The Department of Design and Construction will be in contact with your office in this regard.

Mr. Samuel J. Lemmo
July 9, 2014
Page 2

In the meantime, please note that the draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

NEIL ABERCROMBIE
GOVERNOR



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

June 2, 2014

Mr. Derek Yasaka
President
WCP Inc.
99-061 Koaha Way
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Subject: Waikiki War Memorial Complex Project
Pre-Assessment Consultation for Draft Environmental Impact Statement
TMK: (1) 3-1-031:009

The subject project is not expected to significantly impact the State highway facility. Our Department of Transportation's (DOT) comments are as follows:

1. A permit from DOT Highways Division is required for the transport of oversized and/or overweight materials and equipment on State highway facilities.
2. Since this project involves demolition/transporting excavated and demolished materials, the Contractor shall be responsible for developing a monitoring program regarding leakage or falling of hauled debris materials from truck loads on our highway facilities.
3. The Draft Environmental Impact Statement should discuss inconvenience to the motoring public, bicyclists, pedestrians, joggers, etc.

If there are any questions, please contact Mr. Norren Kato of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

Very truly yours,


FORD N. FUCHIGAMI
Interim Director of Transportation

FORD N. FUCHIGAMI
INTERIM DIRECTOR

Deputy Directors
RANDY GRUNE
AUDREY HIDANO
ROSS M. HIGASHI
JADINE URASAKI

IN REPLY REFER TO:

STP 8.1600

KIRK CALDWELL
MAYOR

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 9, 2014

570464

Mr. Ford M. Fuchigami, Interim Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Fuchigami:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated June 2, 2014.

Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- A permit from the State Department of Transportation, Highways Division, is required for transport of oversized and/or over-weight materials and equipment on State highway facilities.
- The construction contractor shall be responsible for developing a monitoring program to address leakage or falling of hauled debris and/or materials from truck loads on State highway facilities.
- The draft EIS should discuss inconvenience to the motoring public, bicyclists, pedestrians, joggers, etc.

Mr. Ford M. Fuchigami
July 9, 2014
Page 2

We appreciate your agency's participation in the environmental review process.
The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yamamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



May 15, 2014

KIRK CALDWELL, MAYOR

DUANE R. MIYASHIRO, Chair
MAHEALANI CYPHER, Vice Chair
THERESIA C. McMURDO
ADAM C. WONG
DAVID C. HULIHEE

ROSS S. SASAMURA, Ex-Officio
FORD N. FUCHIGAMI, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Subject: Your Letter Dated April 29, 2014 on the Environmental Impact Statement
Pre-Assessment Consultation Request for the Waikiki War Memorial Complex
Project on Kalakaua Avenue – Tax Map Key: 3-1-031: 003

Thank you for the opportunity to comment on the proposed improvements at the Waikiki War Memorial Complex.

The existing water system is adequate to accommodate the proposed improvements. However, please be advised that this information is based upon current data, and therefore, the Board of Water Supply (BWS) reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.

Very truly yours,


ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

MEMORANDUM

TO: ERNEST Y. W. LAU, P.E., MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

FROM: 
MARK YONAMINE, P.E., ACTING DIRECTOR

SUBJECT: PRE-ASSESSMENT CONSULTATION REQUEST FOR THE
WAIKIKI WAR MEMORIAL COMPLEX PROJECT ENVIRONMENTAL
IMPACT STATEMENT

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 15, 2014.

Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- The existing water system is adequate to accommodate the proposed improvements; however, final determination on the availability of water will be confirmed when the building application permit is submitted for approval.
- The City will be required to pay for Water Systems Facilities Charges for resource development, transmission and daily storage.
- Onsite fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.
- The proposed project is subject to Board of Water Supply's cross-connection control and backflow prevention requirements prior to the issuance of the building permit applications.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

MY:li

cc: WCP Inc.

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

KIRK CALDWELL
MAYOR



MANUEL P. NEVES
FIRE CHIEF

LIONEL CAMARA JR.
DEPUTY FIRE CHIEF

May 14, 2014

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Subject: Preassessment Consultation Request for the Waikiki War Memorial
Complex Project
Environmental Impact Statement

In response to your letter of April 29, 2014, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) requires that the following be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1, Uniform Fire Code [UFC]TM, 2006 Edition, Section 18.2.3.2.2.)

A fire department access road shall extend to within 50 feet of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1, UFCTM, 2006 Edition, Section 18.2.3.2.1.)

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-9480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

Mr. Derek Yasaka, President
Page 2
May 14, 2014

capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1, UFC™, 2006 Edition, Section 18.3.1, as amended.)

3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1, UFC™, 2006 Edition, Section 18.2.3.4.1.1, as amended.)
4. Submit civil drawings to the HFD for review and approval.

Should you have questions, please contact Acting Battalion Chief Terry Seelig of our Fire Prevention Bureau at 723-7151 or tseelig@honolulu.gov.

Sincerely,



SOCRATES D. BRATAKOS
Assistant Chief

SDB/SY:bh

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 9, 2014

570464

MEMORANDUM

TO: FIRE CHIEF MANUEL P. NEVES
HONOLULU FIRE DEPARTMENT

ATTN: SOCRATES D. BRATAKOS, ASSISTANT CHIEF

FROM: 
MARK YONAMINE, P.E., ACTING DIRECTOR

SUBJECT: PRE-ASSESSMENT CONSULTATION REQUEST FOR THE
WAIKIKI WAR MEMORIAL COMPLEX PROJECT ENVIRONMENTAL
IMPACT STATEMENT

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 14, 2014.

Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- Honolulu Fire Department access roads shall be provided in accordance with National Fire Protection Association 1, Uniform Fire Code, 2006 Edition, Section 18.2.3.2.2.
- A water supply capable of supplying the required fire flow for fire protection shall be provide in accordance with National Fire Protection Association 1, Uniform Fire Code, 2006 Edition, Section 18.3.1, as amended.
- Fire apparatus access roads shall be unobstructed in accordance with National Fire Protection Association 1, Uniform Fire Code, 2006 Edition, Section 18.2.3.4.1.1, as amended.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

MY:li
cc: WCP Inc.

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honoluluupd.org



KIRK CALDWELL
MAYOR

LOUIS M. KEALOHA
CHIEF

DAVE M. KAJIHIRO
MARIE A. MCCAULEY
DEPUTY CHIEFS

KIRK CALDWELL
MAYOR

OUR REFERENCE EO-WS

May 19, 2014

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

This is in response to your letter dated April 29, 2014, requesting comments on the Pre-Assessment Consultation, Environment Impact Statement, for the proposed improvements to the Waikiki War Memorial Complex project.

The Honolulu Police Department (HPD) currently has no major concerns with the Proposed Action (Preferred Alternative): Creation of War Memorial Beach. However, there may be concerns with the Alternative 1: Reconstruction and Restoration of the Natatorium.

The HPD requests that the city's task force consider the increase in vehicular and pedestrian traffic in and around the area during special events, which would impact the operations of the HPD.

If there are any questions, please contact Acting Major Lisa Mann of District 6 (Waikiki) at 723-3345 or via e-mail at lmann@honolulu.gov.

Sincerely,

LOUIS M. KEALOHA
Chief of Police

By 
RANDAL K. MACADANGDANG
Assistant Chief
Support Services Bureau

Serving and Protecting With Aloha

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

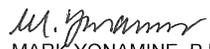
July 9, 2014

570464

MEMORANDUM

TO: LOUIS M. KEALOHA, CHIEF
HONOLULU POLICE DEPARTMENT

ATTN: RONALD K. MACADANGDANG, ASSISTANT CHIEF
SUPPORT SERVICES BUREAU

FROM: 
MARK YONAMINE, P.E., ACTING DIRECTOR

SUBJECT: PRE-ASSESSMENT CONSULTATION REQUEST FOR THE
WAIKIKI WAR MEMORIAL COMPLEX PROJECT ENVIRONMENTAL
IMPACT STATEMENT

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 19, 2014.

We acknowledge that the Honolulu Police Department (HPD) currently has no concerns with the Preferred Alternative—creation of a war memorial beach. However, HPD may have concerns with Alternative 1, the reconstruction and restoration of the Natatorium, relative to its potential to increase vehicular and pedestrian traffic in and around the area during special events, which might impact HPD operations.

We appreciate your agency's participation in the environmental review process, and your above concerns will be addressed in the EIS. The draft EIS will be available for your review and comment when published.

MY:li

cc: WCP Inc.

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 Ulu'ohia Street, Suite 215, Kapele, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3361
Website: www.honolulu.gov

KIRK CALDWELL
MAYOR



ROSS S. SASAMURA, P.E.
DIRECTOR AND CHIEF ENGINEER
EDUARDO P. MANGLALLAN
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 14-363

May 7, 2014

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

SUBJECT: Pre-Assessment Consultation Report for the Waikiki War Memorial
Complex Project, Environmental Impact Statement (EIS)

Thank you for the opportunity to review and to give our input regarding the subject
Environmental Impact Statement dated April 29, 2014.

The Waikiki War Memorial Complex falls under the jurisdiction of the Department of Parks
and Recreation (DPR). We recommend future discussion on the EIS be sent directly to DPR.

If you have any questions, please call Mr. Lan Yoneda of the Division of Road
Maintenance at 768-3600.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross S. Sasamura".

Ross S. Sasamura, P.E.
Director and Chief Engineer

cc: Department of Design and Construction
Department of Parks and Recreation

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

MEMORANDUM

TO: ROSS S. SASAMURA, DIRECTOR
DEPARTMENT OF FACILITY MAINTENANCE

FROM: MARK YONAMINE, P.E., ACTING DIRECTOR

SUBJECT: PRE-ASSESSMENT CONSULTATION REQUEST FOR THE
WAIKIKI WAR MEMORIAL COMPLEX PROJECT ENVIRONMENTAL
IMPACT STATEMENT

The City and County of Honolulu, Department of Design and Construction,
thanks you for your letter dated May 7, 2014.

We acknowledge that the Department of Facility Maintenance has no comments
to offer at this time.

We appreciate your agency's participation in the environmental review process.
The draft EIS will be available for your review and comment when published.

MY:li

cc: WCP Inc.

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR



May 22, 2014

Mr. Derek Yasaka
WCP Inc
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

SUBJECT: Pre-Assessment Consultation
Environmental Assessment/ Environmental Impact Statement
Waikiki War Memorial Complex
2815 Kalakaua Avenue - Diamond Head
Tax Map Key 3-1-31: 3 & 9

This is in response to your letter dated April 29, 2014, requesting comments regarding pre-assessment consultation for the Environmental Assessment/Environmental Impact Statement (EA/EIS) for the above property. The Waikiki War Memorial Complex (WWMC) is located in a Special Management Area (SMA) and will need a SMA Permit (Major). It is also located in the Diamond Head Special District core area and is subject to the design standards and objectives of the district and will require a Special District Permit (Minor). We offer the following preliminary comments:

1. Since the project is located in the core area of the Diamond Head Special District, discuss how the proposed landscaping will enhance the park-like character of Diamond Head. Discuss and show existing trees to remain, removed, replaced, and/or relocated.
2. Off-street parking and vehicle circulation for WWMC should be discussed. Parking lot landscaping require canopy-form trees and screening from street view.
3. Discuss how will the height of the new arch impact existing ocean views and other natural resources? Will the new arch be in the same style as the current design?
4. Provide a discussion on the proposed exterior lighting and how it will impact the shoreline areas and the Diamond Head Special District.

We may have some additional comments when we review the draft EA/EIS.

GEORGE I. ATTA, FAICP
DIRECTOR

ARTHUR D. CHALLACOMBE
DEPUTY DIRECTOR

2014/ELOG-789(JY)

Mr. Derek Yasaka
May 22, 2014
Page 2

Should you have any further questions on this matter, please contact Joette Yago of our staff at 768-8034 or jyago@honolulu.gov.

Very truly yours,

George I. Atta
For George I. Atta, FAICP
Director

Doc1145942_1

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

MEMORANDUM

TO: GEORGE I. ATTA, FAICP, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: *M. Yonamine*
MARK YONAMINE, P.E., ACTING DIRECTOR

SUBJECT: PRE-ASSESSMENT CONSULTATION REQUEST FOR THE
WAIKIKI WAR MEMORIAL COMPLEX PROJECT ENVIRONMENTAL
IMPACT STATEMENT

The City and County of Honolulu, Department of Design and Construction,
thanks you for your letter dated May 22, 2014.

Your comments, summarized below, have been noted and will be considered in
the preparation of the Environmental Impact Statement (EIS):

- The proposed project will require a Special Management Area Permit (Major).
- The proposed project is located in the Diamond Head Special District core area and is subject to design standards and objectives of the district, and will require a Special District Permit (Minor).
- Impacts to existing trees, and consideration of landscaping to enhance the park-like character of Diamond Head.
- Impacts to parking and vehicle circulation at the Waikiki War Memorial Complex and consideration of parking lot landscaping.
- Impacts to visual and aesthetic resources.
- Impacts from exterior lighting on shoreline areas.

We appreciate your agency's participation in the environmental review process.
The draft EIS will be available for your review and comment when published.

MY:li
cc: WCP Inc.

DEPARTMENT OF PARKS & RECREATION
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 309, Kapolei, Hawaii 96707
Phone: (808) 788-3003 • Fax: (808) 788-3053
Website: www.honolulu.gov

KIRK CALDWELL
MAYOR



MICHELE K. NEKOTA
DIRECTOR

JEANNE C. ISHIKAWA
DEPUTY DIRECTOR

May 21, 2014

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Thank you for your letter dated April 29, 2014, regarding the pre-assessment
consultation request for the Waikiki War Memorial Complex Project Environmental
Impact Statement.

The Department of Parks and Recreation (DPR) concurs with the preferred
alternate by the Department of Design and Construction for a creation of a War
Memorial Beach, as illustrated in Figure 3 on the Project Information Sheet.

At this time, DPR has no specific questions or comments regarding the
Environmental Impact Statement being finalized for summer 2014, but reserves the
right to do so for any future updates or drafts during the refinement process.

Sincerely,

Michele K. Nekota
Director

MKN:jj
(560674)

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



KIRK CALDWELL
MAYOR

MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

MEMORANDUM

TO: MICHELE K. NEKOTA, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: 
MARK YONAMINE, P.E., ACTING DIRECTOR

SUBJECT: PRE-ASSESSMENT CONSULTATION REQUEST FOR THE
*WAIKIKI WAR MEMORIAL COMPLEX PROJECT ENVIRONMENTAL
IMPACT STATEMENT*

The City and County of Honolulu, Department of Design and Construction,
thanks you for your letter dated May 21, 2014.

We acknowledge that the Department of Parks and Recreation concurs with the
Preferred Alternative—creation of a war memorial beach.

We appreciate your agency's participation in the environmental review process.
The draft EIS will be available for your review and comment when published.

MY:li

cc: WCP Inc.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov



KIRK CALDWELL
MAYOR

MICHAEL D. FORMBY
DIRECTOR
MARK N. GARRITY, AICP
DEPUTY DIRECTOR

May 27, 2014

TP4/14-560794R

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

SUBJECT: Pre-Consultation for Draft Environmental Assessment (DEA)
Waikiki War Memorial Complex (WWMC)

In response to your letter dated April 29, 2014, we have the following comments:

1. The DEA should include a traffic impact assessment report (TIAR). The TIAR should discuss traffic impacts on the surrounding City roadways as a result of the project, including short-term impacts during construction, short- and long-term proposed mitigating measures by applying complete streets principles. It should include mitigative measures, if necessary, due to the possible increase in beach and park users to the WWMC area of the Kapiolani Regional Park once the existing structure is removed.
2. The area Neighborhood Board, as well as the area residents, businesses, etc., should be kept apprised of the details and impacts, particularly during construction, the proposed project may have on the adjoining local street area network.
3. A street usage permit from the City's Department of Transportation Services should be obtained for any construction-related work that may require the temporary closure of any traffic lane on a City street. Also, a traffic management plan should be prepared that ensures any construction materials and equipment be transferred to and from the project site during off-peak traffic hours (8:30 a.m. to 3:30 p.m.) to minimize any possible impacts to pedestrians and traffic on the local streets.

Mr. Derek Yasaka, President
May 27, 2014
Page 2

4. The project should provide and describe accompanying bicycle facilities on-site in the DEA.

We reserve further comment pending submission of the DEA.

Thank you for the opportunity to review this matter. Should you have any further questions, please contact Michael Murphy of my staff at 768-8359.

Very truly yours,


Michael D. Formby
Director

cc: Chris T. Takashige, P.E.
Department of Design and Construction

Clifford Lau
Department of Design and Construction

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



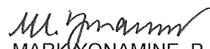
MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 9, 2014

570464

MEMORANDUM

TO: MICHAEL D. FORMBY, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: 
MARK YONAMINE, P.E., ACTING DIRECTOR

SUBJECT: PRE-ASSESSMENT CONSULTATION REQUEST FOR THE
WAIKIKI WAR MEMORIAL COMPLEX PROJECT ENVIRONMENTAL
IMPACT STATEMENT

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 27, 2014.

Your comments, summarized below, have been noted and will be considered in preparing the Environmental Impact Statement (EIS):

- A traffic impact assessment report should be prepared that addresses short-term and long-term traffic impacts and mitigation measures, if necessary.
- The area neighborhood board, area residents, and businesses should be kept apprised of the proposed project with respect to impacts on the adjoining local street network, particularly during construction.
- A street usage permit from your department should be obtained for any construction-related work that may require the temporary closure of any traffic lanes on City streets.
- A traffic management plan should be prepared to address construction activities during off-peak traffic hours (8:30 am - 3:30 pm) to minimize any possible impacts to vehicular and pedestrian traffic on the local streets.
- On-site bicycle facilities should be provided for and discussed in the EIS.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

MY:li
cc: WCP Inc.



WCP Admin <wcp@wcp-hawaii.com>

FW: Pre-Assessment consultation - request for comments on the Waikiki Memorial Complex Project

Liu, Rouen <rouen.liu@hawaiianelectric.com>
To: "wcp@wcp-hawaii.com" <wcp@wcp-hawaii.com>

Thu, Jun 12, 2014 at 1:25 PM

Dear Mr. Yasaka

Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objections to the project. Should HECO have existing easements and facilities on the subject property, we will need continued access for maintenance of our facilities.

We appreciate your efforts to keep us apprised of the subject project in the planning process. As the Waikiki Memorial Complex comes to fruition, please continue to keep us informed. Further along in the design, we will be better able to evaluate the effects on our system facilities.

If you have any questions, please call me at 543-7245.

Sincerely,

Rouen Q. W. Liu

Permits Engineer

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and/or privileged information. Any unauthorized review, use, copying, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender immediately by reply e-mail and destroy the original message and all copies.

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Mr. Rouen Q.W. Liu, Permits Engineer
Hawaiian Electric Company
P.O. Box 2750
Honolulu, Hawaii 96740

Dear Mr. Liu:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your email dated June 13, 2014.

We acknowledge that the Hawaiian Electric Company (HECO) has no objections to the project. However, should HECO have existing easements and facilities on the subject property, HECO will need continued access for maintenance of said facilities.

We appreciate your agency's participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

Linda Wong
Diamond Head, Kapahulu, St. Louis Heights Neighborhood Board No. 5
[REDACTED]

My Comments for the Pre-Assessment Consultation for the Waikiki War Memorial Complex Project Environmental are as follows:

The removal of the old road which was the path that the Kings and Queens used is destroying history! Please note the new addition of the Natatorium on the National Registry of Historical References, in addition to the State Registry of Historical References.

The expansion of a newly proposed paved parking lot from Kalakaua Ave. to the Kaimana Beach Seawall is a bad idea. In the last EIS the proposed paved parking lot was smaller and displaced fewer picnic areas and greener places. The City received a lot of negative comments re the paved parking lot in the passive green Park Trust area. To increase the paved parking area was not listening to the sought after wishes of the public.

Many residents have told me they would like a "walk-up" type of beach to keep it consistent with local use and I agree. We have only one little sliver of a beach left for local use and cherish it dearly. Residents living all over the island of Oahu come to Kaimana (Sans Souci) Beach to remember past good times.

Most do not want their green passive Trust picnic areas overrun even if it means they and their belongings must be dropped off at Kaimana Beach. This also hinders the possibility of tour busses unloading at Kaimana Beach like they have overrun Kapiolani Community College Saturday Community Market and all days at the Diamond Head National Monument.

Thank you for this opportunity to participate in the pre EIS process. I look forward in continuing to participate.

Mahalo,

Linda Wong
[REDACTED]

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Linda Wong, Chairperson
Neighborhood Board No. 5
(Diamond Head, Kapahulu, St. Louis Heights)
[REDACTED]
Honolulu, Hawaii 96815

Dear Ms. Wong:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your comment letter received via email on June 3, 2014.

Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

- The Natatorium has historical significance and is listed on both the National Register of Historic Places and the Hawaii State Register of Historic Places.
- You are opposed to the paved parking lot proposed as part of the Proposed Action and consideration should be given to maximizing green areas in the park and limiting the displacement of existing picnic areas.
- Consideration should be given to a "walk-up" type beach by maintaining "green passive Trust picnic areas," which would also limit the possibility of tour busses "unloading at Kaimana Beach."

Mr. Linda Wong
July 9, 2014
Page 2

We again thank you for your comments and appreciate your participation in the environmental review process. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.



May 14, 2014

Mr. Derek Yasaka
President, WCP Inc.
99-061 Koaha Way, Suite 208
'Aiea, HI 96701

RE: Pre-Assessment Consultation Request for the Waikiki War Memorial Complex Project Environmental Impact Statement

Dear Mr. Yasaka:

Historic Hawai'i Foundation received your letter of April 29, 2014 requesting comments and concerns about the proposed changes to the historic Waikiki War Memorial Natatorium and adjacent areas, and to provide specific issues or concerns that should be addressed in the forthcoming Environmental Impact Statement (EIS).

Historic Hawai'i Foundation (HHF) is a statewide non-profit organization that encourages the preservation of buildings, structures, sites and objects that are significant to the history of Hawai'i. HHF has been a stakeholder in discussions related to the Natatorium for four decades, and remains an interested and concerned party for the preservation and appropriate rehabilitation of this historic site.

We appreciate the opportunity to provide early comments on the scope of the EIS, and recommend that the following issues and questions be considered.

1. Coordination with Section 106 of the National Historic Preservation Act

In addition to the requirements of the Hawai'i Environmental Policy Act (HEPA, Hawai'i Revised Statutes Chapter 343), the proposed undertaking is also subject to consultation under Section 106 of the National Historic Preservation Act (NHPA) due to the requirement for one or more permits, licenses or approvals from one or more federal agencies (e.g. permits under the Rivers and Harbors Act Section 10; Clean Water Act Section 404; Magnuson-Stevens Fishery Conservation and Management Act).

Will the EIS be coordinated with and include consultation for the Section 106 process, or will the environmental and preservation compliance processes be managed separately? The issues are clearly related and would be addressed most effectively through a coordinated and integrated review. This decision would need to be made early in the process, as the parties and standards are not identical, and the procedures for Section 106 consultation are rigorous.

The President's Advisory Council on Historic Preservation and the White House Council on Environmental Quality have issued a handbook on integrating the Section 106 and NEPA

processes designed to help coordinate required review processes under the National Historic Preservation Act and the National Environmental Policy Act. They hope that the handbook will significantly improve the coordination of environmental reviews across the government. This handbook provides practical advice to practitioners and stakeholders to improve the efficiency and effectiveness of federal agencies' environmental review.

You can download the handbook at http://www.achp.gov/docs/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf

As a party with a demonstrated interest in the undertaking and a concern for the undertaking's effect on historic properties, Historic Hawai'i Foundation requests to be a consulting party to the Section 106 process under the implementing regulations of the NHPA (see 36 CFR Part 800.2(c)(5)).

HHF previously participated in a stakeholder interview as part of the pre-consultation assessment process and provided both verbal and written comments to identify questions and issues that should be addressed in the EIS. These include:

2. Jurisdiction and Ownership

The lands and waters associated with the Waikiki War Memorial Complex appear to include multiple parcels, which are associated with a variety of owners, deed restrictions, legal restrictions, and governance requirements. The EIS should clearly identify each relevant parcel and any conditions that apply to its use. These may include such items as the enabling legislation that created the Memorial; the condemnation and purchase action that acquired the property; the areas need to access to the Memorial; the relationship between the State of Hawai'i; City & County of Honolulu; and the Queen Kapi'olani Trust. It is unclear who has jurisdiction and authority, or even the right or responsibility to make decisions for the disposition of the Memorial. The line of authority for the ultimate decision-making needs to be clearly identified and demonstrated.

3. Range of Alternatives

HHF recommends that the EIS include an Alternative 3, which would be "No Construction."

The background information identifies three alternatives to be evaluated in the EIS:

- Proposed Action (identified as the City's preferred alternative) is to demolish the historic War Memorial, build seawalls, add a new sandy beach, construct a memorial arch, and construct various park improvements (i.e. bathhouse, parking lot)
- Alternative 1 is to reconstruct and restore the historic War Memorial, including the swimming pool, deck, bleacher, entry arch and facilities; and include park improvements (i.e. volleyball court, parking, shower, walkways, streetlights)
- Alternative 2 is No Action, which is to be included to provide a baseline for comparison of impacts and is required by HEPA.

The No Construction alternative would be similar to No Action, but rather than wait for negligence and lack of maintenance to lead to an inevitable structural failure and catastrophic collapse, the No Construction alternative would deliberately and systematically remove the

structures and existing improvements. The demolition and removal would be the extent of the action, and no further construction or improvements would be made, either in the sea or on land beyond clean-up and safety requirements to complete the demolition process. The site would return to its natural shoreline as it existed pre-1927.

This alternative would provide a truer baseline condition to which the other alternatives could be compared for environmental, historic, cultural, recreational, and cost impacts.

Please note that HHF does not endorse the selection of the No Construction alternative, but feels that its inclusion in the EIS would provide valuable information as a more accurate and likely baseline than No Action.

4. The EIS Must Contain a Reasonable Range of Rehabilitation Alternatives:

The EIS must explore alternatives for a rehabilitated Natatorium that meet the same water quality standards as the adjacent ocean. In other words, if the application of Hawaii Department of Health Rules on Public Swimming Pools (Hawaii Administrative Rules § 11-10) is determined to be cost prohibitive, alternative pool designs should be analyzed that would address health and safety concerns without requiring application of those Rules. For instance, the Rules define a "Swimming pool" as an entity that contains an "artificial body of water." The previously-approved tidal flow pool restoration design does not enclose such an artificial body and would therefore not be covered by the Rules. If the Health Department Rules are held to apply, alternatives must be explored that qualify for special exemptions from those rules, such as "beach venues," like nearby Kuhio Beach, and "marine habitat."

5. All Applicable Regulatory Requirements Must be Considered:

Demolition of the Natatorium requires federal approvals that must be conducted concurrently with the Hawaii Environmental Policy Act (HEPA) process. A joint process would avoid lengthy and costly delays in the implementation of the Project. This recommendation is supported by HRS § 343-5(h), which states,

"Whenever an action is subject to both the National Environmental Policy Act of 1969 (Public Law 91-190) and the requirements of this chapter, the office and agencies shall cooperate with federal agencies to the fullest extent possible to reduce duplication between federal and state requirements. Such cooperation, to the fullest extent possible, shall include joint environmental impact statements with concurrent public review and processing at both levels of government."

Because the City must seek federal permits from the Army Corps of Engineers under section 10 of the Rivers and Harbors Act and section 404 of the Clean Water Act, the EIS should, at a minimum, describe the process by which it will be cooperating with the Army Corps to coordinate its State EIS review with NEPA and other federal permitting requirements including Section 106 of the National Historic Preservation Act, the Clean Water Act, the Endangered Species Act, the Magnuson-Stevens Fishery Conservation and Management Act, and the Coastal Zone Management Act.

In addition, demolition of the resource is a legal impossibility. Existing City law explicitly forbids the demolition of the Natatorium. The Revised Ordinances of Honolulu, Sec. 2-16.1, states:

The director of parks and recreation shall: (a) operate and maintain the Waikiki war memorial and natatorium, including its structures, facilities, and grounds.

It is not clear that the fact of this law has been taken into account by the Project sponsor. The City must clarify in the EIS that its preferred alternative cannot be carried out absent City Council action to nullify existing law, an action which Natatorium advocates would strongly oppose.

The EIS must contain an extensive analysis of anticipated permitting requirements. These include:

- The federal and state regulations, reviews and permits that would be implicated or required by each alternative;
- Analysis of the applicability of the 1973 Hawaii Supreme Court ruling that resulted in a permanent injunction “enjoining and restraining the defendant-appellees [the City and County of Honolulu and the State of Hawaii] ... from in any way tearing down or demolishing the Natatorium.” *Natorium Preservation Committee v. Edelstein*, 55 Haw. 55, 61 (1973)

6. The EIS Must Fully Analyze the Environmental Consequences of Natatorium Demolition:

The methodology that would be used for demolition should be fully developed and explained. How will the structural elements be removed? What would the effect be on the marine environment? How will the debris be removed and how will it be disposed of?

The current stability of the shoreline is dependent on the Natatorium serving as a retaining wall for sand on the adjacent Sans Souci Beach. The environmental impacts of alteration to the shoreline must be studied, including

- Affects to water quality due to release of sediment from the pool bottom with respect to federal clean water standards and regulations;
- Adverse impacts on the reef and marine life;
- Erosion of Sans Souci beach;
- Construction of the infrastructure that would be necessary to retain a new beach.

In addition, the EIS must disclose what would be necessary, during or after construction, to address the sand and sediment that is currently on the Natatorium bottom. Under each alternative, what kind of sand will go back into the reconstructed pool or onto artificial beach? In each case, what environmental impacts would be expected?

The EIS must also contain a thorough analysis of the impact that climate change and rising sea levels will have on the creation of a new beach, particularly on the potential long-term costs of beach nourishment projects that will be required to keep sand in place. Demolition

would require repeated dredging, and transport of sand at a time when such efforts should be focused on retaining existing beaches on Waikiki.

7. Engineering for the Project Must Be Supported by Adequate Data:

The cost and feasibility of building each alternative must be scrutinized by appropriate experts.

- The previously permitted restored tidal flow along with the Ko Olina Swimming Lagoons were designed by UH ocean engineers Karl H. Bathen, PhD and Frans Gerritsen, PhD. The previously studied and permitted tidal flow design must be included in the EIS as an alternative;
- The demolition alternative must be analyzed by ocean engineers (as opposed to coastal geologists) for adverse impacts including erosion, creation of rip currents, and sedimentation of the reef;
- The EIS should explicitly detail the academic qualifications of any engineers or other experts whose opinions or judgments are cited;
- Wilson Okamoto Corp. prepared a Structural Condition Report in July 2004 concluding that the “bleacher structure appears to be in good overall condition.” The EIS should include an alternative that would preserve this structure, even if the swimming basin is reconfigured or removed.

8. Cost Considerations Must Not Serve as the Basis for Rejecting Preservation Alternatives

The EIS should detail how cost estimates have been developed as well as the degree to which cost is a factor in the selection of the preferred alternative. The EIS must also be structured so as to fairly analyze the environmental consequences of each alternative without coming to a pre-ordained conclusion based on earlier cost estimates.

In addition, the following factors must be considered:

- Current cost estimates should be procured for each alternative from licensed contractors (as opposed to planners).
- In order to have an equal comparison, cost estimates for each alternative should be based on A/E design documents rather than on conceptual plans or sketches.
- What would be the funding sources and financing mechanisms for each of the alternatives?
- Cost estimates should include the component estimates as well as the cumulative totals. The alternatives currently described include a much more extensive level of park improvements associated with the Preservation Alternative (e.g. volleyball court, parking, shower, walkways, streetlights) than the Demolition Alternative (e.g. bathroom and parking). As the levels of improvements are not equivalent, it is misleading to state one is more expensive than the other. A line-item cost breakdown will allow for side-by-side comparisons of alternatives.

9. Related Maintenance Costs Must Be Included in the EIS and Factored into Estimates

Each alternative will have operational costs that must be considered in the EIS. It should address the following questions:

- What are the comparative costs of each alternative?
- What is the basis of these cost estimates?
- What assurances would there be under the preferred alternative that the beach sand will remain where installed rather than wash out and alter surf breaks, envelope reef habitat or cause other adverse environmental impacts.
- If the beach erodes, what is the anticipated annual beach nourishment cost?
- How will that impact beach access, tourism and area hotels and businesses?
- Where will the sand come from?
- Has there been an environmental study done for that area?
- Will the constantly replacing sand be more costly than rehabilitating and maintaining a tidal flow pool?
- The alternatives analysis should specifically assess the potential to generate revenue for an ongoing maintenance fund for each alternative.

10. The Feasibility and Cost of Replacement Facilities Must be Considered

The Natatorium currently houses men's and women's restrooms, showers and changing areas, along with the Ocean Safety Division's District 1 regional headquarters and Rescue One operations. All of these amenities would be lost under the demolition alternative. In addition, the demolition alternative does not include a volleyball court and more than 30 parking spaces.

- Where would all of these current functions and facilities be moved under the preferred alternative?
- Are the sites for the parking, restrooms and lifeguards secured?
- Will any of the functions or spaces be diminished in their replacement form and sites?
- Will relocating the Ocean Safety offices elsewhere result in any adverse impact to public safety?
- What, if any, are the relevant land/lease cost of procuring new sites for replacement facilities?
- The costs associated with replacing all these functions and facilities (including land, soft costs and construction costs) must be included in the cost estimates for demolition.

11. Swimming/Recreational Use:

The Natatorium's enabling legislation requires that the site include a swimming venue of 100 meters in length [Act 15 of the 1921 Territorial Legislature]. The plans for the tidal flow pool would have been the only fully ADA-accessible salt water swimming venue in the state.

- The preferred (demolition) alternative does not comply with the enabling legislation, because it would remove the 100-meter swimming venue.
- Will the artificial beach be ADA-accessible for both beach-going and swimming?
- What engineering studies have been done to show that the artificial beach would be safe in terms of man-made hazards and rip currents? For instance, would the sand come level to the new groins? Have related safety issues been explored, e.g., swimmers climbing onto the groins and falling off or diving off in a dangerous manner?
- Will the City incur additional liability for injuries or drownings that occur at a beach that is City-designed and constructed?
- A rehabilitated Natatorium would offer recreationalists protection from open ocean currents. It would enable many to swim in the ocean who are otherwise unable, including the disabled, children and the elderly.
- Under the demolition alternative, the loss of the seawall would change surrounding currents. According to the 2008 Shoreline Restoration Study Conceptual Design Review Report "during large wave events straight groins are known to produce rip currents along the groin edges that can transport the sand seaward." (p.53) Will that change adversely affect beach goers? Would it become unsafe for swimmers to leave the groin boundaries? Would surfers and their breaks be adversely impacted by any alteration of the current shoreline conditions?

12. Veterans' Concerns:

The War Memorial Natatorium was opened in 1927 as a "living memorial" in tribute to the more than 10,000 men and women from Hawaii who served in World War I. A rehabilitated Natatorium would best honor the veterans and victims of war by providing a public venue for recreation, recuperation and reflection. Restoring and reopening the Natatorium would also preserve the historical message sent to the future by the people of post-war Territorial Hawaii.

- The process of reaching out to stakeholders should specifically include outreach to veterans groups to ask which alternative is preferred.
- The EIS should also identify ways in which each of the alternatives will specifically address the interests of veterans.
- From 2014 to 2018, the United States and nations around the world will mark the 100th anniversary of World War I. There will be a high degree of media interest in the state of memorials developed for Americans who served in the war. Is the City prepared for the negative media exposure that would result from its preferred alternative of demolition?

Historic Hawai'i Foundation was a member of the City's Task Force in 2009, and did not concur with the majority recommendation that led to the City's current proposed action.

HHF stated then, and reiterates now, that **Historic Hawai'i Foundation's preferred alternative for the War Memorial** is summarized as:

- HHF supports the stabilization, preservation and rehabilitation of the Waikiki War Memorial Natatorium.

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



KIRK CALDWELL
MAYOR

MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

- HHF recommends that the immediate strengthening, repair and stabilization of the structure's frame be completed, including the sea walls and deck.
- HHF recommends, in conjunction with resuming the work to stabilize the structure, that engineering, planning and permitting be undertaken for the redesign of the pool.
- HHF recommends that the City engage in dialogue with state and federal agencies, non-profit organizations, business organizations and other stakeholders to craft a public-private partnership for the long-term rehabilitation, maintenance and operation of the facility.

Thank you for the opportunity to provide early comment on the scope of the Environmental Impact Statement. Please let me know if you have any questions or need further information on these issues and comments.

Very truly yours,

Handwritten signature of Kiersten Faulkner in cursive.

Kiersten Faulkner, AICP
Executive Director

Copies via email:

Alan Downer & Michael Gushard, State Historic Preservation Division
Mo Radke & Donna Ching, Friends of the Natatorium
Brian Turner, National Trust for Historic Preservation
Farley Watanabe, U.S. Army Corps of Engineers Regulatory Branch

Kiersten Faulkner, Executive Director
Historic Hawaii Foundation
680 Iwilei Road, Suite 690
Honolulu, Hawaii 96817

Dear Ms. Faulkner:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 14, 2014, which recommended issues and questions for consideration in the Environmental Impact Statement (EIS). For ease of reference we provide responses to your comments by category as presented in your letter.

1) Coordination with Section 106 of the National Historic Preservation Act (NHPA)

Consultation under Section 106 of the NHPA will be coordinated concurrently with the EIS process. Further, your request that the Historic Hawaii Foundation (HHF) be a consulting party in the Section 106 consultation process is acknowledged.

2) Jurisdiction and Ownership

You note that ownership, access, jurisdictional authority, and legal restrictions associated with the lands and waters comprising the Waikiki War Memorial Complex are unclear. The EIS will address the above issues and how they pertain to the "decision-making" relationship between the State of Hawaii, City and County of Honolulu, and the Queen Kapiolani Trust.

3) Range of Alternatives

We acknowledge that the HHF recommends that the EIS include an Alternative 3, which would be "No Construction". Your recommendation will be considered with respect to alternatives evaluation. We note that the No Action alternative may involve the future actions you describe in your proposed "No Construction" alternative in order to address required public safety measures.

4) The EIS Must Contain a Reasonable Range of Rehabilitation Alternatives

During the EIS process a range of reasonable alternatives will be considered. The range of alternatives to be considered must be practical and/or feasible from a technical and economic standpoint, support the underlying purpose of and need for the proposed project, and are ready for decision (i.e., in consideration of time, budgetary, resource, and legal constraints).

5) All Applicable Regulatory Requirements Must be Considered

During the EIS process consideration of all applicable federal, state, and county regulatory requirements will be considered. In addition, we note your question regarding applicability and clarification of the existing City law, Revised Ordinance of Honolulu, Sec. 2-16.1, as it relates to the Proposed Action. This issue will be addressed during the EIS process in terms of the relationship of alternatives to existing plans, polices, and laws.

6) The EIS Must Fully Analyze the Environmental Consequences of Natatorium Demolition

We acknowledge your point that the Natatorium presently functions as a retaining wall for sand to accumulate on the adjacent Kaimana Beach to the south. The EIS will address the environmental impacts of removing the Natatorium on adjacent shoreline areas, water quality, coral reefs, and marine life. In addition, the EIS will also address long-term impacts associated with operation and management costs and potential issues related to climate change.

7) Engineering for the Project Must Be Supported by Adequate Data

Preliminary engineering, cost, and feasibility details for the Proposed Action and alternatives will be developed and assessed throughout the EIS process, based on current available data, by appropriate subject matter experts.

8) Cost Considerations Must Not Serve as the Basis for Rejecting Preservation Alternatives

Thank you for your detailed comment concerning the consideration of cost as it relates to assessing the potential impacts of alternatives. Evaluation of alternatives must be based on relevant factors including technical and economic considerations. The environmental review process is required to evaluate potential impacts of alternatives on both the natural and man-made environment. The latter of which includes, but is not limited to, economic and cost considerations. As such, the EIS will assess economic and cost considerations as part of the overall impact analysis.

9) Related Maintenance Costs Must Be Included in the EIS and Factored into Estimates

As stated in response to comment #6, the EIS will address economic and cost considerations including those related to facility operation, management, and maintenance.

10) The Feasibility and Cost of Replacement Facilities Must be Considered

Similar to responses to comments #8 and #9 above, the feasibility and cost of replacement facilities will be addressed and evaluated in the EIS.

11) Swimming/Recreational Use

Issues related to recreational users including ADA accessibility and public safety considerations will be addressed in the EIS. Legal interpretation of the Natatorium's enabling legislation requirements will also be considered and addressed in the EIS with respect to evaluating the relationship of alternatives to existing plans, polices, and laws.

12) Veteran's Concerns

We recognize the historic significance of the Waikiki War Memorial Complex and the important role it plays as a memorial in the lives of veterans, their families, and the community as a whole. As a key stakeholder group the City continues to reach out to Veterans associations to identify their concerns and issues, which will be addressed in the EIS.

Ms. Kiersten Faulkner
July 9, 2014
Page 4

We appreciate your interest and participation in the environmental review process. The issues you have identified will be considered in preparing the EIS, the draft of which will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.



WCP Admin <wcp@wcp-hawaii.com>

natatorium WCP comments

Rick Bernstein [REDACTED]
To: wcp@wcp-hawaii.com

Wed, Jun 4, 2014 at 10:53 AM

Dear Sirs,

I have been asked to comment on the City's proposed plans for the Waikiki War Memorial Natatorium. As a member of the City sponsored Natatorium Task Force, I am in complete agreement with the Mayor and Governor regarding the creation of a new beach. The beach plan will return this long suffering and incredibly valuable resource to its proper owner, the ocean, and create two acres of new stable beach. This resource will be enjoyed by the community and visitors to Honolulu and will have very minimal maintenance costs associated with it.

I have reviewed the proposed plan provided by Will Chee and Associates (WPI). I differ with the proposed parking lot that would be placed in the grassy area adjoining the Kaimana Beach Hotel and fronting Kaimana Beach. This plan would require a loss of prime recreational park area and bring automobiles very close to the beach. The community has started weighing in on this via KITV News. (See May 29, 2014 news piece "Dog Fight Brewing About Natatorium Parking") They reported on how opponents and proponents of a new beach were now, finally, in agreement about something, that being their opposition to the proposed parking area.

I voiced my displeasure about the parking area to the City several months ago and proposed an alternative plan. It involves leaving the existing driveway in place and having it turn right and continue out to Kalakaua from where it now dead ends at the Aquarium. I believe there is adequate room to have the road and if more is necessary, a small amount of the Aquarium property could be used. Further, the driveway would be one way, with the entry at the Diamond Head (hotel side) or the park and the exit on the Ewa (Aquarium) side. I also proposed metering all parking spaces to discourage the many employees of the Aquarium, Hotel, and Waikiki workers who presently use the driveway as free parking while they work. By metering the driveway employees will just as easily park on Kalakaua or other locations. This will free up additional spaces for beach users and be a big improvement over the present situation. Finally, approximately ten new parking spaces could be added on either side of the new road continuation.

I realize that the lovely Banyon at the Ewa end of the Natatorium park is a historically protected tree. However, if it were to become blighted and removed like the other Banyons in the park, that area would be a more desirable parking lot than the proposed area in front of the beach.

These are my suggestions for the time being. Thank you for your time and consideration

Rick Bernstein

Kaimana Beach Coalition

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



KIRK CALDWELL
MAYOR

MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 9, 2014

570464

Rick Bernstein
Kaimana Beach Coalition
[REDACTED]
Honolulu, Hawaii 96816

Dear Mr. Bernstein:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your email received on June 4, 2014 in which you provided the following comments:

- We note that you were a member of former Mayor Hannemann's Waikiki War Memorial Task Force in 2009, and are in complete agreement with the position held by both the current Mayor and Governor to move forward with the proposal to create a new war memorial beach, the City's Preferred Alternative.
- You support the Preferred Alternative as you feel it would return a valuable resource to the ocean by creating a new stable beach that could be enjoyed by the community and visitors to Honolulu and which will have minimal maintenance costs.
- We acknowledge that you differ with the City's proposed construction of a new parking lot as part of the Preferred Alternative because it would result in a loss of prime recreational park area. As such, you propose an alternative plan and suggest that the City reevaluate the proposed parking lot.

Mr. Rick Bernstein
July 9, 2014
Page 2

We appreciate your participation in the environmental review process. The comments you provided will be taken into consideration during preparation of the Environmental Impact Statement (EIS). The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

McCabe, Hamilton & Renny Co., Ltd.

“THE STEVEDORES”

Since 1900

Serving the Ports of Honolulu, Barbers Point,
Kahului, Maui and Lihue, Kauai

DEPARTMENT OF DESIGN AND CONSTRUCTION CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 9, 2014

570464

Mr. Derek Yasaka
President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, Hawaii 96701

Dear Mr. Yasaka,

As a member of Mayor Hanneman's Waikiki War Memorial Task Force, I strongly support the "Preferred Alternative," as opposed to the ridiculously expensive and essentially useless "Alternative 1" or the unacceptable choice of doing nothing at all. (Alternative 2).

In the interim since the Task Force completed its work, I have had numerous conversations with Dr. Andrew Rossiter, the Director of the Waikiki Aquarium, in my capacity as a member of the Board of Directors of the "Friends of Waikiki Aquarium" (FOWA). Dr. Rossiter recently forwarded to me a proposal to incorporate a new Waikiki Aquarium into the comprehensive plan for the make-over of the Waikiki War Memorial. I can think of nothing that makes better sense than for the City and County of Honolulu to take such a bold and imaginative step.

If there is even a remote possibility of considering the inclusion of the Waikiki Aquarium as an Alternative 3, I strongly urge that you expand the scope of the planning process in order to do so.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tim Guard".

Tim Guard

Tim Guard
McCabe, Hamilton & Renny Co., Ltd.
P.O. Box 210
Honolulu, Hawaii 96810

Dear Mr. Guard:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter received on June 25, 2014.

- We acknowledge that as a member of former Mayor Hannemann's 2009 Waikiki War Memorial Task Force, you strongly support the creation of a war memorial beach.
- We acknowledge your position as a member of the Friends of Waikiki Aquarium Board of Directors and your request to consider the possibility of including of the new Waikiki Aquarium proposal as an additional alternative.

We appreciate your participation in the environmental review process and the issues you have identified will be considered in preparing the Environmental Impact Statement (EIS). The draft EIS will be available for your review and comment when published.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark Yonamine".
Mark Yonamine, P.E.
Acting Director

MY:li
cc: WCP Inc.

Celia Shen

From: EDGAR HAMASU [REDACTED]
Sent: Tuesday, May 27, 2014 5:42 PM
To: cshen@wcpahawaii.com
Subject: Re: Waikiki War Memorial Complex Project

Aloha,

I would presume that you have not received my email response to the EIS project on Waikiki Natatorium Site. Somehow between my desk top computer and me, we've tried but not very successfully in emailing my comments. Hope this one goes through! Please let me know if you got this. Mahalo!

Edgar A. Hamasu

Edgar A Hamasu

On Fri, May 23, 2014 at 11:33 AM, EDGAR HAMASU [REDACTED] wrote:
Waikiki Natatorium Complex Project

Thank you for your response! Sorry, I'm still a novice at sending and receiving email. Hope this gets to you all right.

Before I send this email out, could I mention briefly of my voluntary service as a Korean War veteran?

Just to show my appreciation to Uncle Sam, our government, who provided me with VA educational bill of right; thus, allowing me to graduate from Michigan State University, with BS in City Planning and MA in Public Administration, I volunteered to help the veterans after I retired from my work as City Planner.

I served for 5 years as State Service Officer for the Veterans of Foreign Wars. I also served as State Adjutant & Quartermaster for 3 years with the VFW. In the VFW Post Level, I served as Health & Wellness Officer of Post 10276. Finally, I served for 3 years as President, 2 years as Vice President, and 5 years as Secretary of the Military Intelligence Veterans Club of Hawaii.

Edgar A. Hamasu

----- Forwarded message -----
From: EDGAR HAMASU [REDACTED]
Date: Wed, May 21, 2014 at 6:32 PM
Subject: Waikiki War Memorial Complex Project

To: wcp@wcpahawaii.com

Mr. Derek Yasaka, President
WCP Inc.
99-061 Koaha Way, Suite 208
Aiea, HI 96701

Mr. Yasaka,

Thank you for sending me the early consultation request on the pending EIS of the subject project.

I served in the 2009 Waikiki Natatorium Task Force. It was made up of 12-15 Honolulu citizens with various professions and interests. For me, as a Korean War veteran and a city planner by profession (former Planning Director of Hawaii County), it was a richly rewarding experience. Not in terms of any monetary gain. But, to be given the opportunity to meet others on the Task Force and exchange ideas with engineers, community leaders, environmentalists, historians, veterans, businessman, ocean scientist and others.

It was strictly a voluntary service on our part and we met regularly for many months. Numerous specialists came before the Task Force to explain various proposals and related cost of development and maintenance.

At the end, there was a vote taken of the Task Force members on how best to utilize the Natatorium site. Most of the members felt the Memorial Arch replica and the Roll of Honor plaque should be retained, a new beach should be created in place of the Natatorium with sand retention structures and suggested that the name of the new beach be "WW I Veterans Memorial Beach." There were only 2 persons who dissented from the Task Force decision.

The Task Force was in full agreement that keeping the Natatorium site in status quo condition would be worst because of health, safety and aesthetic reasons. Also, a valuable public shoreline property is being wasted and not used for the benefit of our citizens.

At one point, in response to vociferous opposition by some representing historic preservation organization, a question was asked if their non-profit organization would agree to accept an executive order from the City or the State to reconstruct, restore and maintain the Natatorium site for the purpose which they espouse. Their response was negative. They wanted the tax payers to fund the total project.

As a member of the 2009 Task Force, the proposal to create a new beach as shown on Figure 3, best reflects the decision of the Task Force, and will deeply honor the heroic WW I veterans and will provide optimum benefit to Hawaii's people. Finally, time is of the essence for your project, because the Natatorium wall is rapidly eroding.

Edgar A Hamasu

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 788-4567
Web site: www.honolulu.gov



KIRK CALDWELL
MAYOR

MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464.

July 9, 2014

Edgar A. Hamasu

[REDACTED]
Honolulu, Hawaii 96816

Dear Mr. Hamasu:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction,
thanks you for your email received on May 27, 2014.

- We acknowledge your voluntary service as a member of former Mayor Hannemann's 2009 Waikiki War Memorial Task Force (Task Force), and that the City's Preferred Alternative—creation of a new war memorial beach—reflects the decision of the Task Force.
- Thank you also for summarizing your recollections from the Task Force including the following:
 - a. The Task Force was in full agreement that keeping the Natatorium in status quo (deteriorating) condition was the least desirable option, namely because of health, safety, and aesthetic reasons. Also, a valuable public shoreline property is being wasted and not used for the benefit of the public.
 - b. The majority of the Task Force voted for the construction of a replica memorial arch (with the existing Roll of Honor Plaque being retained) and a new memorial beach; only two Task Force members dissented from the Task Force decision.
 - c. During the meetings, proponents for preserving the Natatorium indicated that reconstruction, restoration, and maintenance costs should be funded by the public.

Mr. Edgar Hamasu
July 9, 2014
Page 2

- We acknowledge your point that "time is of the essence" for implementing the proposed project because the Natatorium is rapidly deteriorating.
- Lastly, we acknowledge your position that the City's proposal to create a new memorial beach will deeply honor the heroic World War I veterans and will provide optimum benefit to Hawaii's people.

We appreciate your participation in the environmental review process and the issues you have identified will be considered in preparing Environmental Impact Statement (EIS). The draft EIS will be available for your review and comment when published.

Very truly yours,

Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

WCP Inc.

May 21, 2014

Aloha,

Thank you for inviting me to give my thoughts regarding the Waikiki War Memorial Natatorium.

I support the "Preferred Alternative," the creation of a War Memorial Beach.

1. Would provide more public beach available to all with no entry fees.
2. Historically the Natatorium area was part of the Waikiki beach where the warriors of both Kahekili (1780's) and Kamehameha (1790's) landed to conquer Oahu. (Kanalele, George S., Waikiki 100 B.C. to 1900 A.D.)

I am opposed to the Reconstruction and Restoration of the Natatorium. The negatives include:

1. The costs which would be paid for by the taxpayers:
 - a. Rebuilding the pool, bleachers and facilities.
 - b. Maintenance, both daily and long term.
 - c. Insurance (because of the inevitable accidents.)
2. Entry charges to attend activities such as sand volleyball and entertainment shows.

I don't know whether the following is pertinent or not, however, I tend to compare the Waikiki Shell which used to have shows for which we paid admission and the intention of some to have shows at the restored Natatorium. Shows at the Waikiki Shell are almost non-existent now. So what is the need for another venue?

Mahalo,
Mary B. Bowers

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov



KIRK CALDWELL
MAYOR

MARK YONAMINE, P.E.
ACTING DIRECTOR

GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

July 9, 2014

570464

Mary Bowers

Honolulu, Hawaii 96822

Dear Ms. Bowers:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 21, 2014.

- We acknowledge that you support the creation of a war memorial beach as it would provide additional public beach area with no entry fees.
- We also note that you are opposed to the reconstruction and restoration of the Natatorium due to the costs associated with rebuilding the pool, bleachers and facilities, maintenance, and insurance, as well as possible entry fees to attend activities at the reconstructed/restored Natatorium.
- We thank you for providing information relative to the project area's role in Hawaiian history (i.e., landing site of both Kahekili's and Kamehameha's warriors during the late 18th century).

We appreciate your participation in the environmental review process. The issues you have identified will be considered in the preparation of the Environmental Impact Statement (EIS). The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li
cc: WCP Inc.

Carla von Wiegandt
[REDACTED]

29 May 2014

Mr. Derek Yasaka
WCP, Inc.
Land Use Planners and Environmental Consultants
99-061 Koaha Way #208
Aiea, Hawaii 96701

Dear Mr. Yasaka:

Thank you for contacting me and giving me the opportunity to express my thoughts.

With restoral of the Natatorium we create a new marketing strategy for Hawai'i tourism and although the challenges to restoring and maintaining the Natatorium ocean swimming pool may prove challenging, I truly believe that restoring it would not only provide opportunities for long term employment to our local citizenry from concrete workers, to engineers and architects but also is a superb way to inspire and train the upcoming generations, who will face the ongoing challenges as global warming raises our shoreline. Preparing the work forces now will encourage the universities, trade schools, apprentice programs to create courses to reach the goals that global scientists recommend. Rather than us being unprepared, we will have studied and tested potential solutions that perhaps will help other states and countries. Hawai'i's workers can lead the way on abatement and restoring ocean swimming pools, possibly acting as consultants in the future for the other pools across the globe. If our workers benefit our peoples benefit as does the touring visitor.

Let us not lose this opportunity, for the handicapped, truly, I cannot think of very many better ways for our elderly and ambulatory challenged to enter the ocean in Waikiki especially, if you are not a guest of the hotels.

The ideas presented at the task force 2009 recommending demolition and or relocation are understandable, but I think shortsighted. The Waikiki Natatorium War Memorial name recognition is worldwide and if demolished would be lost and or tarnished forever. Please do not be tempted by short term profit. Orphaned children don't forget what their parent(s) contributed to war.

Finally, the War Memorial was designed as a living testament to keep in mind the devastating effect when countries chose to go to war with one another and is visibly needed in these very agitated times. To hear laughter and joy ring through the pool once again would be sweet music to the souls of the departed.

If you have sailed off Waikiki you know how elegant and graceful Diamondhead appears with Natatorium's majestic eagles, seats and arches as her skirt.

Sincerely,
Carla von Wiegandt

Natorium Goals

Thoughts and Reflections on How to Accomplish the Goal

Aloha,

We may have met a long time ago and again recently at a Natatorium meeting; you may remember I am 100% committed to having it restored for the purpose of swimming.

What seems so obvious to me is how urgently the pool is needed **now** for our Veterans; as well as for people from all walks of life. The recovering wounded warriors, our handicapped and elders seemingly are being disregarded, as if they are invisible and have no desire to ever swim again.

Shall we provide these individuals (some of whom have lost limbs) with an easy entry into the balmy Pacific waters? Wouldn't they also love to swim, safely protected in the ocean pool? Shall we once again hear the joyous sounds of family fun ringing through the arches of honor?

How many times on the nearby wall have we seen a person in a wheelchair longingly gaze out at those having water fun? Have you engaged them in conversation? How many of us have a family member in a wheelchair or relying on a walker?

We the citizens of Oahu have generously shared Waikiki with millions of visitor for many years; now I ask all of those visitors to help us restore a world class Olympic ocean swimming pool for all to enjoy.

We are aloha and Hawaiian values in action, when WE, the People, EMPOWER the Natatorium reconstruction goals with our energy and effort. Imagine how you will feel in the decades to come knowing you helped restore the ocean swimming pool.

From the healthy to those with restored hips, to your relatives and our returning service men and women; all should be able to use the ocean pool that was designed for them. It is money worth spending, investing in our future wellbeing, as well as for all those who visit Hawai'i. As my friend, Curtis "da bull" Iaukea, used to say to me and others "Go, go get in the ocean, it's good for you."

Just yesterday I met Kelly and Robert from Kansas, newlyweds as of Saturday. I had noticed them near the lifeguard stand at the beach next to the Natatorium and later, when they passed by me, I introduced myself and asked if Kelly had been able to get into the ocean. She smiled up brightly at me and beamed "Oh Yes, it was my first time at the ocean." Robert explained a nearby hotel had lent them a type of sand wheelchair that he was able to navigate to the shoreline. Asked if the Natatorium was reopened would they be return visitors for a second try at getting into the Pacific? The light in Kelly's eye's and smile on Robert's face was all the answer I needed to understand how wonderful it was for both of them to feel this lovely ocean and what an opportunity we have for all the Kelly's and Robert's of the world, by restoring our ocean pool swiftly.

Please join in working on the restoral of the Natatorium forthwith.

Hawai'i Assets which can be brought to bear:

- Recruit from the talent pool we have and from those training in the schools of Hawai'i.
- Utilize the project to further the working skills of the students and newly graduated and create opportunity for the unemployed.

We have:

- Excellent corps of civil engineers, oceanographers, divers, large scale construction contractors and concrete experts and others familiar with new techniques.
- Innovative student populations; who can create new apps which could generate revenue for the ongoing restoral costs.
- A fantastic volunteer Citizen force experienced with charity events.
- Strong community business participation in sponsorships and endowments from corporations, hotels, realtors, merchants, individuals.
- We can uncover and tap into unused existing corollary funds.

It seems that many want the Waikiki Natatorium War Memorial to remain a part of our iconic shoreline which is why it is still here waiting for our lovely hula hands to reshape her new figure and 21st century destiny.

Thank You, I look forward to working with you on the Natatorium restoral.

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Carla von Wiegandt

[REDACTED]
Honolulu, Hawaii 96816

Dear Ms. von Wiegandt:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, thanks you for your letter dated May 29, 2014. Your comments, summarized below, have been noted and will be considered in the preparation of the Environmental Impact Statement (EIS):

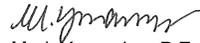
- We acknowledge your position that you support Alternative 1 (restoration of the Natatorium), and your opinion that the ideas of former Mayor Hannemann's 2009 Waikiki War Memorial Task Force (Task Force) recommending demolition and/or relocation are understandable, but short-sighted.
- We note your opinion that potential beneficial impacts resulting from reconstructing the Natatorium might include:
 - a. Opportunities for handicapped, elderly, and/or ambulatory challenged individuals to gain access to Waikiki's ocean waters.
 - b. Employment and economic opportunities resulting from reconstruction and operation of the Natatorium.
 - c. Addressing global warming preparation/planning efforts by encouraging "universities, trade schools, and apprentice programs to create courses to reach goals that global scientists recommend."
 - d. Preparing Hawaii's workers to "lead the way on abatement and restoring ocean swimming pools, possibly acting as consultants in the future for the other pools across the globe."

Ms. Carla von Weigandt
July 9, 2014
Page 2

- We note your opinion that the Natatorium provides a beneficial visual and aesthetic impact to the Waikiki-Diamond Head coastal landscape.
- Lastly, we acknowledge and agree with your statement that the War Memorial was designed as a living testament to commemorate those lost during a time of war. As a key stakeholder group the City continues to reach out to Veterans' associations to identify their concerns and issues, so that they will be adequately addressed in the EIS.

We appreciate your participation in the environmental review process and the issues you have identified will be considered in preparing the EIS. The draft EIS will be available for your review and comment when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

May 30, 2014

Mr. Derek Yasaka
President, WCP Inc.
99-061 Koaha Way, Suite 208
'Aiea, HI 96701

**Re: Pre-Assessment Consultation Request for the Waikiki War Memorial
Complex Project Environmental Impact Statement**

VIA FedEx and Email

Dear Mr. Yasaka:

Thank you for your letter of April 29, 2014 to Stephanie K. Meeks, President and CEO of the National Trust for Historic Preservation regarding the Waikiki War Memorial Complex Project. We appreciate you keeping us informed on the status of this Project as an interested organization.

The National Trust strongly supports the May 15, 2014 letter on this subject from the Historic Hawaii Foundation and we endorse their viewpoint that the War Memorial should be stabilized, preserved and rehabilitated. We invite the City and the State to renew efforts to work with stakeholders and partner on a financing model and business plan that will sustain the site and make it once again an anchor on the famous Waikiki shoreline.

Pursuant to its Congressional Charter, the National Trust for Historic Preservation is committed to promoting public participation in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. *See* 16 U.S.C. § 468. On May 21, 2014, our organization announced the designation of the War Memorial Natatorium as a "National Treasure" (*see* www.savingplaces.org/natatorium). Pursuant to this designation, we have teamed up with allies in Hawaii on a comprehensive public outreach plan. We intend to urge the City and State to use the environmental review process now underway to honor the site's history as a World War I Memorial and repair and rehabilitate the Natatorium to once again be a vibrant aquatic facility.

As outlined in our comments below, we are concerned that the consequences of the plan to demolish the entire site and reconstruct only its archway has not thoroughly studied. It would undoubtedly result in the loss of its status on the National Register of Historic Places. And it would also mean the loss of an entire resource type in our nation as there is no remaining comparable structure in the United States.

Preservation of the site's design and integrity, in contrast, has a very practical environmental purpose. In addition to conserving the tangible elements of the site, it would avoid the unknown costs of pursuing a demolition project in a sensitive marine environment. This concern is particularly acute given that the creation of a beach would require substantial new construction in order to prevent the existing adjacent beach from washing away.

We respectfully submit the following questions and issues to assure an equitable analysis of alternatives in the Waikiki War Memorial Complex Project Environmental Impact Statement, as required by the Hawaii Environmental Policy Act (HRS § 343).

The EIS Must Contain a Reasonable Range of Rehabilitation Alternatives.

The EIS must explore alternatives for a rehabilitated Natatorium that are reasonable and include a close investigation of how the existing site can be repaired and rehabilitated at a feasible cost. We urge attention to how existing materials can be reinforced rather than removed such as the large embedded concrete pilings that support the decking, seawall elements, and bleacher and archway complex.

In addition, a design should be considered for an ocean swimming venue that meets the same water quality standards as the adjacent ocean. If the application of Hawaii Department of Health Rules on Public Swimming Pools (Hawaii Administrative Rules § 11-10) is determined to be disproportionate in cost, alternative pool designs must be analyzed that would address health and safety concerns without the need for expensive pumping and filtration systems. For instance, the Rules define a "Swimming pool" as an entity that contains an "artificial body of water." The previously-approved tidal flow pool restoration design does not enclose such an artificial body and would therefore not be inconsistent with the Rules.

In addition, alternatives must be explored that qualify for special exemptions from the Health Department Rules, such as "beach venues," like nearby Kuhio Beach, and "marine habitat." The insertion of a beachfront within the Natatorium in order to meet the pool regulations, for instance, could be an effective compromise that would maintain most of the qualities that make the resource eligible for the National Register.

All Applicable Regulatory Requirements Must be Evaluated and Satisfied.

Demolition of the Natatorium would require federal approvals that must be conducted concurrently with the review process under the Hawaii Environmental Policy Act (see attached letter of 8/26/2009 for a more complete analysis of the applicable law). A joint process would avoid lengthy and costly delays in the implementation of the Project. This recommendation is supported by HRS § 343-5(h), which states,

"Whenever an action is subject to both the National Environmental Policy Act of 1969 (Public Law 91-190) and the requirements of this chapter, the office and agencies shall cooperate with federal agencies to

the fullest extent possible to reduce duplication between federal and state requirements. Such cooperation, to the fullest extent possible, shall include joint environmental impact statements with concurrent public review and processing at both levels of government."

Because the City must seek federal permits from the Army Corps of Engineers under section 10 of the Rivers and Harbors Act and section 404 of the Clean Water Act, the EIS should, at a minimum, describe the process by which the City and the State will be cooperating with the Army Corps to coordinate its State EIS review with NEPA and other federal permitting requirements—including Section 106 of the National Historic Preservation Act.

In addition, the EIS must contain an analysis of how demolition would be accomplished consistent with existing City and County law. For instance, Section 2-15.1 of the Revised Ordinances of Honolulu states:

"The director of parks and recreation *shall*: (a) *operate and maintain* the Waikiki war memorial and natatorium, including its structures, facilities, and grounds." (emphasis added)

There is no evidence that this law has been taken into account. The City must clarify in the EIS that its proposed demolition alternative cannot be carried out absent City Council action to nullify existing law, an action which Natatorium advocates would strongly oppose.

Finally, the City's proposed alternative to demolish the Natatorium has not yet been thoroughly evaluated in the environmental review process. For example, the Waikiki War Memorial Park and Natatorium EIS (prepared in 1998), which approved a rehabilitated Natatorium with a tidal flow pool design, did not analyze the impacts and permitting requirements associated with the demolition alternative. As a result, this EIS must contain a thorough analysis of those anticipated impacts and permitting requirements. These include:

- The federal and state regulations, reviews and permits that would be implicated or required by each alternative; and
- Analysis of the applicability of the 1973 Hawaii Supreme Court ruling that resulted in a permanent injunction "enjoining and restraining the [City and County of Honolulu and the State of Hawaii] ... from in any way tearing down or demolishing the Natatorium." *Natatorium Preservation Committee v. Edelstein*, 55 Haw. 55, 61 (1973)

The EIS Must Fully Analyze the Environmental Consequences of Demolishing the Natatorium.

The current stability of the shoreline is dependent on the Natatorium serving as a retaining wall for sand on the adjacent Sans Souci Beach. The potential environmental impacts of altering the shoreline must be studied, including:

- Effects on water quality due to release of sediment from the pool bottom with respect to federal clean water standards and regulations;
- Adverse impacts on the reef and marine life;
- Erosion of Sans Souci beach; and
- construction of the infrastructure that would be necessary to retain or re-create a new beach.

In addition, the EIS must disclose what would be necessary, during or after construction, to address the sand and sediment that is currently on the bottom of the Natatorium. Under each alternative, what kind of sand would go back into a reconstructed pool or onto an artificial beach? In each case, what environmental impacts would be expected?

Finally, the EIS must contain a thorough analysis of the impact that climate change and rising sea levels may have on the creation of a new beach, particularly on the potential long-term costs of beach replenishment that will be required to keep sand in place. For example, demolition would require repeated dredging and transport of sand at a time when it might be more important for such efforts to be focused on retaining existing beaches on Waikiki.

Engineering for the Project Must Be Supported by Adequate Data.

The cost and feasibility of building each alternative must be scrutinized by appropriate experts.

- The previously approved tidal flow design along with the Ko'Olina Swimming Lagoons were designed by UH ocean engineers Karl H. Bathen, PhD and Frans Gerritsen, PhD. This previously studied and approved design must be included in the EIS as an alternative.
- The demolition alternative must be analyzed by ocean engineers (as opposed to coastal geologists) for adverse impacts including erosion, creation of rip currents, and sedimentation of the reef.
- The EIS should explicitly detail the academic qualifications of any engineers or other experts whose opinions or judgments are cited.
- Wilson Okamoto Corp. prepared a Structural Condition Report in July 2004 concluding that the "bleacher structure appears to be in good overall condition."

The EIS should include an alternative that would preserve this structure along with the façade of the memorial, even if the swimming basin is reconfigured or removed.

Cost Considerations Must Be Accurately Assessed and Equitably Compared.

Previous representations from the City and State have indicated that cost is the sole basis for proposing demolition over retention of the Natatorium. Even though these estimates have not been made public, they have unfortunately led to the impression that rehabilitation is infeasible. See, e.g., Grube, Nick, *Abercrombie Teams With Caldwell To Tear Down Waikiki Natatorium*, Honolulu Civil Beat, May 1, 2013, available at <http://www.civilbeat.com/articles/2013/05/01/18956-abercrombie-teams-with-caldwell-to-tear-down-waikiki-natorium/> (reporting that at a press conference the Mayor and Governor based their decision to demolish the historic resource on cost estimates. They did not provide information, however as to how their cost estimates were developed, and we dispute them).

The EIS should detail how cost estimates have been developed, as well as the degree to which cost is a factor in evaluating the alternatives. The EIS must also be structured so as to fairly analyze the environmental consequences of each alternative without coming to a pre-ordained conclusion based on outdated cost estimates that have never been made public.

To the extent that cost is relied on as a central factor, partnerships with non-profit organizations such as Friends of the Natatorium must be considered prior to making a determination about the feasibility of financing a rehabilitation project. This applies to both bricks and mortar construction costs as well as endowing future operational costs from philanthropic, public, and private sources. For instance, in the wake of the City's 2013 announcement about its proposed demolition proposals in 2013, several major national donors have expressed interest in partnering to help endow an aquatic facility that would retain key historic elements of the facility. However, such donors have no confidence that the City is willing to engage in a public-private partnership with a capable non-profit organization.

In addition, the following factors must be considered:

- Current cost estimates must be prepared for each alternative, and should be procured from licensed contractors.
- In order to have an accurate comparison, cost estimates for each alternative should be based on A/E design documents rather than on conceptual plans or sketches.
- What would be the funding sources and financing mechanisms for each alternative?

Related Maintenance Costs Must Be Included in the EIS and Factored into Cost Estimates.

Each alternative will have operational costs that must be considered in the EIS. It should address the following questions:

- What are the comparative costs of each alternative?
- What is the basis of these cost estimates?
- What assurances would there be under the demolition alternative that the beach sand would remain where installed rather than washing out and altering surf breaks, enveloping reef habitat, or causing other adverse environmental impacts?
- If the beach erodes, what is the anticipated annual cost of beach replenishment?
- How would that impact beach access, tourism and area hotels and businesses?
- Where would the sand come from and what would be the associated environmental consequences?
- Would the cost of constantly replacing the sand be higher than rehabilitating and maintaining a tidal flow pool?
- The alternatives analysis should specifically assess the potential to generate revenue for an ongoing maintenance fund for each alternative.

The Feasibility and Cost of Replacement Facilities Must be Realistically Evaluated and Considered.

The Natatorium currently houses men’s and women’s restrooms, showers and changing areas, along with the Ocean Safety Division’s District 1 regional headquarters and Rescue One operations. All of these amenities would be lost under the demolition alternative. In addition, the demolition alternative does not include a volleyball court and more than 30 parking spaces.

- Where would all of these current functions and facilities be moved under the demolition alternative?
- Are the sites for the parking, restrooms and lifeguards secured?
- Would any of these functions or spaces be diminished in their replacement form and sites?
- Would relocating the Ocean Safety offices elsewhere result in any adverse impact to public safety?
- What, if any, would be the relevant land/lease cost of procuring new sites for replacement facilities?

- The costs associated with replacing all these functions and facilitates (including land, soft costs and construction costs) must be included in the cost estimates for demolition, in order to ensure an equitable “apples-to-apples” comparison of alternatives.

Swimming/Recreational Use.

The Natatorium’s enabling legislation requires that the site include a swimming venue of 100 meters in length (*see* Act 15 of the 1921 Territorial Legislature). Under the plans developed in 1998, the tidal flow pool would have been the only fully ADA-accessible salt water swimming venue in the state.

- The EIS should state that the demolition alternative does not comply with the enabling legislation, because it would remove the 100-meter swimming venue.
- Would the artificial beach be ADA-accessible for both beach-going and swimming? Its potential for accessibility by the disabled is one of the key features that makes the Natatorium unique among swimming venues in Hawaii.
- What engineering studies have been done to show that an artificial beach would be safe in terms of man-made hazards and rip currents? For instance, would the sand come level to the new groins? Have related safety issues been explored, e.g., swimmers climbing onto the groins and falling off or diving off in a dangerous manner?
- A rehabilitated Natatorium would offer recreationalists protection from open ocean currents. It would enable many to swim in the ocean who are otherwise unable to do so, including the disabled, children and the elderly.
- Under the demolition alternative, the loss of the seawall would change surrounding currents. According to the 2008 Shoreline Restoration Study Conceptual Design Review Report, “during large wave events straight groins are known to produce rip currents along the groin edges that can transport the sand seaward.” (p.53) Would that change adversely affect beach goers? Would it become unsafe for swimmers to leave the groin boundaries? Would surfers and their breaks be adversely impacted by alteration of the current shoreline conditions?

Veterans’ Concerns.

The War Memorial Natatorium was opened in 1927 as a “living memorial” in tribute to the more than 10,000 men and women from Hawaii who served in World War I. A rehabilitated Natatorium would best honor the veterans and victims of war by providing a public venue for recreation, recuperation and reflection. Repairing and reopening the Natatorium as the Memorial it was intended to be would also preserve the historical message sent to the future by the people of post-war Territorial Hawaii.

- The process of reaching out to stakeholders should specifically include outreach to veterans’ groups to ask which alternative is preferred.

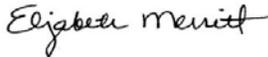
- The EIS should also identify ways in which each of the alternatives would specifically address the interests of veterans.
- From 2014 to 2018, the United States and nations around the world will mark the 100th anniversary of World War I. This factor should be considered in the selection of alternatives, as there will be a high degree of media interest in the state of memorials developed for Americans who served in the war.

Thank you for considering the scoping comments of the National Trust for Historic Preservation.

Sincerely,



Brian R. Turner
Senior Field Officer & Attorney, San Francisco Field Office
National Trust for Historic Preservation



Elizabeth S. Merritt
Deputy General Counsel
National Trust for Historic Preservation

Attachments:

Letter from National Trust for Historic Preservation to Mr. Collins D. Lam, P.E., August 26, 2009.

Cc (via email):

Mr. Alan Downer, Hawaii State Historic Preservation Division Administrator
Mr. George P. Young, P.E., Chief, Regulatory Branch, Army Corps of Engineers
Kiersten Faulkner, Executive Director, Historic Hawaii Foundation
Maurice "Mo" D. Radke, President, Friends of the Natatorium

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Brian Turner, Senior Field Officer and Attorney
National Trust for Historic Preservation
San Francisco Field Office
5 Third Street, Suite 707
San Francisco, California 94103

Dear Mr. Turner:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, would like to thank you for your letter dated May 30, 2014, as well as the attached 2009 National Trust letter to Mr. Collins D. Lam, former Chairman of the Waikiki War Memorial Task Force, regarding "Historic Waikiki Natatorium – Legal and Regulatory Issues for Consideration." We acknowledge that the National Trust strongly supports and endorses the Historic Hawaii Foundation's viewpoint that the Natatorium should be stabilized, preserved, and rehabilitated.

Your letter further recommended issues and questions to assure an equitable analysis of alternatives in the forthcoming Environmental Impact Statement (EIS). For ease of reference we provide responses to your comments by category as presented in your letter.

1) The EIS Must Contain a Reasonable Range of Rehabilitation Alternatives

During the EIS process a range of reasonable alternatives will be considered. The range of alternatives to be considered must be practical and/or feasible from a technical and economic standpoint, support the underlying purpose of and need for the proposed project, and are ready for decision (i.e., in consideration of time, budgetary, resource, and legal constraints).

2) All Applicable Regulatory Requirements Must be Evaluated and Satisfied

During the EIS process consideration of all applicable federal, state, and county regulatory requirements will be considered. In addition, we note your question regarding applicability and clarification of the existing City law, Revised Ordinance of Honolulu, Sec. 2-16.1, as it relates to the Proposed Action. This issue will be addressed during the EIS process in terms of the relationship of alternatives to existing plans, policies, and laws.

3) The EIS Must Fully Analyze the Environmental Consequences of Natatorium Demolition

We acknowledge your point that the Natatorium presently functions as a retaining wall for sand to accumulate on the adjacent Kaimana Beach to the south. The EIS will address the environmental impacts of removal of the Natatorium on adjacent shoreline areas, water quality, coral reefs, and marine life. In addition, the EIS will also address long-term impacts associated with operation and management costs and potential issues related to climate change.

4) Engineering for the Project Must Be Supported by Adequate Data

Preliminary engineering, cost, and feasibility details for the Proposed Action and alternatives will be developed and assessed throughout the EIS process, based on current available data, by appropriate subject matter experts.

5) Cost Considerations Must Be Accurately Assessed and Equitably Compared

Thank you for your detailed comment concerning the consideration of cost as it relates to assessing the potential impacts of alternatives. Evaluation of alternatives must be based on relevant factors including technical and economic considerations. The environmental review process is required to evaluate potential impacts of alternatives on both the natural and man-made environment. The latter of which includes (but is not limited to) economic and cost considerations. As such, the EIS will assess economic and cost considerations as part of the overall impact analysis.

6) Related Maintenance Costs Must Be Included in the EIS and Factored into Estimates

As stated in response to comment #3, the EIS will address economic and cost considerations including those related to facility operation, management, and maintenance.

7) The Feasibility and Cost of Replacement Facilities Must be Realistically Evaluated and Considered

Similar to responses to comments #5 and #6 above, the feasibility and cost of replacement facilities will be addressed and evaluated in the EIS.

8) Swimming/Recreational Use

Issues related to recreational users including ADA accessibility and public safety considerations will be addressed in the EIS. Legal interpretation of the Natatorium's enabling legislation requirements will also be considered and addressed in the EIS with respect to evaluating the relationship of alternatives to existing plans, policies, and laws.

9) Veteran's Concerns

We recognize the historic significance of the Waikiki War Memorial Complex and the important role it plays as a memorial in the lives of veterans, their families, and the community as a whole. As a key stakeholder group the City continues to reach out to Veterans associations to identify their concerns and issues, which will be addressed in the EIS.

We appreciate your participation in the environmental review process. The issues you have identified will be considered in the preparation of the EIS. The draft EIS will be available for your review when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR



MARK YONAMINE, P.E.
ACTING DIRECTOR
GERALD HAMADA, P.E.
ACTING DEPUTY DIRECTOR

570464

July 9, 2014

Elizabeth S. Merritt, Deputy General Counsel
National Trust for Historic Preservation
The Watergate Office Building
2600 Virginia Avenue NW, Suite 1100
Washington, DC 20037

Dear Ms. Merritt:

Subject: Pre-Assessment Consultation Request for the *Waikiki War Memorial Complex Project Environmental Impact Statement*

The City and County of Honolulu, Department of Design and Construction, would like to thank you for your letter dated May 30, 2014, as well as the attached 2009 National Trust letter to Mr. Collins D. Lam, former Chairman of the Waikiki War Memorial Natatorium Task Force, regarding "Historic Waikiki Natatorium – Legal and Regulatory Issues for Consideration." We acknowledge that the National Trust strongly supports and endorses the Historic Hawaii Foundation's viewpoint that the Natatorium should be stabilized, preserved, and rehabilitated.

Your letter further recommended issues and questions to assure an equitable analysis of alternatives in the forthcoming Environmental Impact Statement (EIS). For ease of reference we provide responses to your comments by category as presented in your letter.

1) The EIS Must Contain a Reasonable Range of Rehabilitation Alternatives

During the EIS process a range of reasonable alternatives will be considered. The range of alternatives to be considered must be practical and/or feasible from a technical and economic standpoint, support the underlying purpose of and need for the proposed project, and are ready for decision (i.e., in consideration of time, budgetary, resource, and legal constraints).

Ms. Elizabeth S. Merritt
July 9, 2014
Page 2

2) All Applicable Regulatory Requirements Must be Evaluated and Satisfied

During the EIS process consideration of all applicable federal, state, and county regulatory requirements will be considered. In addition, we note your question regarding applicability and clarification of the existing City law, Revised Ordinance of Honolulu, Sec. 2-16.1, as it relates to the Proposed Action. This issue will be addressed during the EIS process in terms of the relationship of alternatives to existing plans, policies, and laws.

3) The EIS Must Fully Analyze the Environmental Consequences of Natatorium Demolition

We acknowledge your point that the Natatorium presently functions as a retaining wall for sand to accumulate on the adjacent Kaimana Beach to the south. The EIS will address the environmental impacts of removal of the Natatorium on adjacent shoreline areas, water quality, coral reefs, and marine life. In addition, the EIS will also address long-term impacts associated with operation and management costs and potential issues related to climate change.

4) Engineering for the Project Must Be Supported by Adequate Data

Preliminary engineering, cost, and feasibility details for the Proposed Action and alternatives will be developed and assessed throughout the EIS process, based on current available data, by appropriate subject matter experts.

5) Cost Considerations Must Be Accurately Assessed and Equitably Compared

Thank you for your detailed comment concerning the consideration of cost as it relates to assessing the potential impacts of alternatives. Evaluation of alternatives must be based on relevant factors including technical and economic considerations. The environmental review process is required to evaluate potential impacts of alternatives on both the natural and man-made environment. The latter of which includes (but is not limited to) economic and cost considerations. As such, the EIS will assess economic and cost considerations as part of the overall impact analysis.

6) Related Maintenance Costs Must Be Included in the EIS and Factored into Estimates

As stated in response to comment #3, the EIS will address economic and cost considerations including those related to facility operation, management, and maintenance.

Ms. Elizabeth S. Merritt
July 9, 2014
Page 3

7) The Feasibility and Cost of Replacement Facilities Must be Realistically Evaluated and Considered

Similar to responses to comments #5 and #6 above, the feasibility and cost of replacement facilities will be addressed and evaluated in the EIS.

8) Swimming/Recreational Use

Issues related to recreational users including ADA accessibility and public safety considerations will be addressed in the EIS. Legal interpretation of the Natatorium's enabling legislation requirements will also be considered and addressed in the EIS with respect to evaluating the relationship of alternatives to existing plans, polices, and laws.

9) Veteran's Concerns

We recognize the historic significance of the Waikiki War Memorial Complex and the important role it plays as a memorial in the lives of veterans, their families, and the community as a whole. As a key stakeholder group the City continues to reach out to Veterans associations to identify their concerns and issues, which will be addressed in the EIS.

We appreciate your participation in the environmental review process. The issues you have identified will be considered in the preparation of the EIS. The draft EIS will be available for your review when published.

Very truly yours,


Mark Yonamine, P.E.
Acting Director

MY:li

cc: WCP Inc.