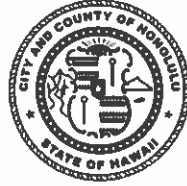


**DEPARTMENT OF ENVIRONMENTAL SERVICES
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CITY AND COUNTY OF HONOLULU**

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IN REPLY REFER TO:
PRO 24-042

May 2, 2024

VIA ELECTRONIC SUBMITTAL

Mr. Jonathan Nagato, P.E., Acting Chief
State of Hawai'i, Department of Health
Wastewater Branch
2827 Waimano Home Road, Room 207
Pearl City, Hawai'i 96782

Dear Mr. Nagato:

SUBJECT: Request for Reaffirmation of Previously Issued Final Environmental Impact Statement and Record of Decision
Honouliuli WWTP Phase 1C – Headworks, HRBC, Solids Process and Misc. Improvements
Clean Water State Revolving Fund (CWSRF) Project No. C150051-82

The City and County of Honolulu (CCH), Department of Environmental Services (ENV), is constructing the Honouliuli Wastewater Treatment Plant (WWTP) Phase 1C – Headworks, HRBC, Solids Process and Misc. Improvements project. This project is based on the Final Environmental Impact Statement (FEIS) entitled, "Honouliuli/Waipahu/Pearl City Wastewater Facilities Plan, Honouliuli Wastewater Treatment Plant Secondary Treatment and Support Facilities" that was accepted by ENV on March 28, 2017.

ENV has reviewed the FEIS and concluded that there are no changes to the project that would alter the conclusions of the prior environmental decision document and the finding remains valid. ENV requests DOH's reaffirmation of the previously issued FEIS and the associated Record of Decision.

The FEIS anticipated the need to upgrade the plant headworks, replace the primary clarifiers with High Rate Biological Contact (HRBC) units, and improve the plant's solids processing system to recover energy from biogas with a combined heat and power (CHP) system.

The 2010 Consent Decree (Civil No. 94–00765 DAE–KSC) between CCH, DOH, and the U.S. Environmental Protection Agency (EPA), now referred to as the First Amended Consent Decree (FACD), requires CCH-ENV to meet certain requirements with respect to its wastewater collection system and WWTPs. In the FACD, ENV agreed to complete improvements to the Honouliuli WWTP which must be upgraded to fully meet secondary treatment standards by June 1, 2024.

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CCH-ENV, the proposing agency, has determined that the planned actions for the Honouliuli WWTP require the preparation of an EIS. The Final Environmental Assessment-EIS Preparation Notice (FEA-EISPN) submitted for this project and published in The Environmental Notice on July 23, 2010, examined potential impacts associated with proposed upgrades to and/or expansion of the Honouliuli major sewer conveyance system in addition to improvements at the Honouliuli WWTP itself. The FEA-EISPN predates the issuance of the FACD described above.

Since the FEA-EISPN submittal, the focus of the Honouliuli Facility Plan was expanded to include the Honouliuli WWTP improvements necessary to comply with the FACD and meet the upgrade deadline of June 1, 2024. This FEIS includes the upgrade and expansion of the Honouliuli WWTP to provide secondary treatment and accommodate projected wastewater flows, as well as addresses the potential location of non-process facilities to accommodate future needs that will arise from upgrading the Honouliuli and Sand Island WWTPs to secondary treatment.

CCH-ENV, as the accepting agency, has reviewed the effects of the proposed activities as well as the character of this project and determined that construction of the Honouliuli WWTP Phase 1C – Headworks, HRBC, Solids Process and Misc. Improvements project is generally consistent with the 2017 FEIS and beneficial, and adverse environmental impacts evaluated therein continue to be as originally represented.

Should you have any questions, please contact Paul Christiansen, Civil Engineer, at (808) 768-3470 or via email at p.christiansen@honolulu.gov.

Sincerely,



Roger Babcock, Jr., Ph.D., P.E.
Director