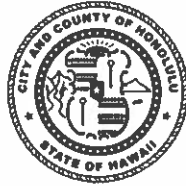


**DEPARTMENT OF ENVIRONMENTAL SERVICES  
KA 'OIHANA LAWELAWE KAIĀPUNI  
CITY AND COUNTY OF HONOLULU**

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RICK BLANGIARDI  
MAYOR  
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June 30, 2025

ROGER BABCOCK, JR., Ph.D., P.E.  
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MICHAEL O'KEEFE  
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KA LUA O KA HOPE PO'O

IN REPLY REFER TO:  
PRO 25-048

**SENT VIA EMAIL**

jonathan.nagato@doh.hawaii.gov

Mr. Jonathan Nagato, P.E. 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 Effluent Treatment & Outfall Improvements  
Clean Water State Revolving Fund (CWSRF) Project No. C-150051-88

The City and County of Honolulu (CCH), Department of Environmental Services (ENV) is designing the Honouliuli Wastewater Treatment Plant (WWTP) Effluent Treatment & Outfall Improvements project. This project is referenced in 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 the State of Hawai'i, Department of Health's (DOH's) reaffirmation of the previously issued FEIS and the associated Record of Decision.

Section A.6.b of ENV's current National Pollution Discharge Elimination System Wastewater Discharge Permit No. HI 0020877 (Permit) issued by DOH requires that ENV comply with the final effluent limitations for enterococcus by June 30, 2030. The Honouliuli WWTP Effluent Treatment & Outfall Improvements project is intended to meet this Permit condition.

The FEIS stated that disinfection would be incorporated into the overall WWTP upgrade in the event that effluent disinfection is required in the future. The project would also include outlet channels and flow measurement improvements (collectively, "Outfall Improvements").

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, including required secondary treatment.

CCH-ENV, the proposing agency, determined that the planned actions for the Honouliuli WWTP require the preparation of an Environmental Impact Statement (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 the 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 secondary treatment 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 effect of the proposed activities as well as the character of this project and determined that construction of the Honouliuli WWTP Effluent Treatment & Outfall Improvements project is generally consistent with the 2017 FEIS, and any adverse environmental impacts evaluated therein continue to be as originally represented.

If you have any questions, please contact Paul Christiansen, Civil Engineer, at (808) 768-3470 or email [p.christiansen@honolulu.gov](mailto:p.christiansen@honolulu.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Babcock, Jr.", with a stylized flourish at the end.

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