



April 20, 2020

(via email: jhaghara@hhf.com)

John Hagihara, Sr. Associate
HHF Planners
733 Bishop St., Suite 2590
Honolulu, HI 96813

Re: Early Consultation (Draft EA & Section 106) for the Wailua Wastewater Treatment Plant (WWTP)
Alternative Effluent Disposal System

Aloha Mr. Hagihara,

The Wailua-Kapaa Neighborhood Association appreciates the opportunity to provide early comments on the project referenced above. The W-KNA board supports the expanded reuse of R-2 effluent for irrigation purposes at the Wailua Municipal Golf Course. We also encourage the county to identify additional potential uses for reclaimed water.

Listed below are comments for your consideration which include areas of concern to address in the EA.

- 1) Other than serving as a disposal method, direct discharges to coastal waters have no clear benefit to the environment or water supplies, therefore, wastewater effluent should be recycled to the greatest extent possible.
- 2) Your document notes that the plant has undergone 4 phases of expansion. But, the current average daily flow, and the average daily flow capability after the expansion are not provided.
- 3) What are the peak flows currently and what is anticipated?
- 4) What are the dimensions of an “adequate” buffer between the areas being sprayed and the adjacent publicly accessible area?
- 5) The document states the “excess treated effluent is currently routed to an existing ocean outfall” and that “the County will be conducting periodic inspections of sand buildup at the end of the pipe to unclog the diffuser if necessary.” What is the location of ocean outfall disposal and can it be indicated on the DEA maps? What is the outfall pipe made of, what is its diameter, and depth? A diagrammatic explanation of the outfall pipeline and diffuser would be helpful.
- 6) Has the county conducted a microbiological ocean outfall study to track/map where the treated R-2 wastewater effluent travels once it is discharged into the ocean? If so, please include a summary; if not, please explain why.
- 7) The Draft Archaeological Report recommends archaeological monitoring guided by an SHPD-approved Archaeological Monitoring Plan (AMP) for work in Project Areas B, C, and D. The W-KNA board supports this recommendation.

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- 8) The 16th Hole Overflow Pond Expansion (Project Area C): To accommodate disposal during overflow or “off-spec” events such as heavy rainfall “the overflow pond may be expanded along the 16th hole and the connection pipe may be enlarged.” What are the proposed dimensions and depth? Will the existing 16th hole overflow pond double in size? Triple in size?
- 9) How many Australian Pine Trees and Cook Pine Trees must be removed to accommodate expansion of existing holding pond? Or, does the expansion encompass an area that does not impact these mature trees next the 16th Hole Overflow Pond (Figure 5).
- 10) In the Draft Archaeological Report (page 8-figure 6) a label states: “No irrigation piping within 100-ft setback from shoreline.” What is date of the certified shoreline delineation use in aerial map Figure 6? If a recent shoreline delineation was not used, the APE boundaries may not be accurate.
- 11) Since WWTPs are built next to water for ease of disposal, climate change poses a threat to wastewater infrastructure and untreated or partially treated sewage may be released in the wake of intense storm events. And, much of the Wailua Golf Course is identified by FEMA as a coastal high hazard areas (VE Zone, El. 11 feet). Please highlight the county’s specific plans for adaptation strategies due to climate change and sea level rise for the near future.
- 12) The Wailua WWTP is at a 10-25 feet elevation and typically, treatment plants are in areas lower than the associated service areas. The Flood Insurance Rate Map (FIRM), issued by the Federal Emergency Management Agency (FEMA), indicates that the WWTP is located in Zone X (an area determined to be outside of the 100 year flood plain). However, the impacts of sea level rise and coastal hazards are accelerating. What are the county’s plans for a second treatment plant or alternate location for the WWTP?
- 13) The existing WWTP has been subject to periodic overflows and consequent sewage spills within Lydgate Park. Will the proposed improvements help to put an end to these spills or mitigate their impacts on the park? If not, what plans are there to address these significant public health impacts?
- 14) Will the proposed improvements address the sewage odors which often permeate the park?

Thank you again for the opportunity to comment.

Sincerely,



Rayne Regush, Chair
On behalf of the W-KNA Board of Directors

cc: Jason Kagimoto, Chief of Wastewater Mgmt Division (jkagimoto@kauai.gov)