



University of Hawai'i at Mānoa

Environmental Center

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July 10, 1994
RP:0163

District Engineer (CEPOD-ED-PH)
US Army Corps of Engineers
Building 230
Fort Shafter, Hawaii 96858-5440

Dear Sir:

Section 404 Permit Application (PODCO CW94-0001)
Kawainui Marsh Flood Control Project
Kailua, Oahu

The referenced permit application addresses the U.S. Army Corps of Engineers plans for mitigating potential flooding from the Kawainui Marsh into the Coconut Grove residential community. The plan entails raising the existing levee and constructing a 4-foot high concrete wall atop new earthen structure.

Our review was conducted with the assistance of Chris Welch of the Environmental Center.

The Kawainui Marsh project has been under public scrutiny for several years, yet the incorporation of input from the public at large has been in many ways ignored. The reviewers reiterated points made in previous consultations on the Kawainui Marsh project. The abstract to the Final Environmental Impact Statement (FEIS) clearly spells out the alternatives considered. None of the proposed actions includes watershed management issues or the necessity to address vegetation growth and siltation within Kawainui Marsh. Suggestions concerning these important ends can be found in the comments contained within the FEIS. Within the domain of the FEIS, the comments seem to have been overlooked.

Some issues still need resolution before the construction of the earthen levee should proceed. First, long-term care of the marsh, in its capacity as a flood and siltation basin, needs to be addressed. Consideration of the levee and wall as a stand alone project constitutes a failure of common sense with serious potential legal consequences. If no long-term management of the watershed is incorporated into the measures taken at Kawainui Marsh at this juncture, then certainly it will be left to individuals and organizations in the future. Should the impetus to properly manage the drainage basin be a catastrophic flood event, repair and restoration costs in the future will be great indeed. Unfortunately, one of the devices that will probably be employed is litigation to redress harm resulting from the present course.

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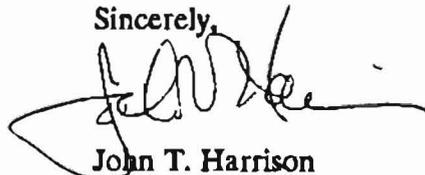
One of the main concerns for the use of Kawainui Marsh as a flood basin is the lack of maintenance to the basin itself. By raising the levee, the specter of a more devastating flood arises unless areas behind the levee are routinely maintained (including those areas in the watershed). Sedimentary impacts from activities in the watershed should be better documented, understood, and controlled when possible. Since sedimentation will be an ongoing process for the Kawainui Marsh, a plan to remove some of this buildup should be instituted. The same argument is valid for the accumulation of organic matter due to natural marsh processes. If the accumulation of sediment and organic constituents impedes the working of the marsh as a suitable flood control basin, then action to alleviate this problem should be instituted in conjunction with other measures taken.

Other concerns with the raised levee and wall center around the visual impact that these items will have for residences and individuals that value the scenic view of the marsh. Although the increased height of the levee is the preferred methodology of the Corps, it has been noted that flood capacity could be increased through alteration of the marshland itself. Such alteration would ameliorate the need for the large increase in the levee size and the appurtenant wall. The result would be a substantially lower visual impact incorporated while simultaneously making a commitment to manage the marsh for a considerably longer time horizon.

This project appears to address symptoms and not root causes. The raising of the levee and wall without a concomitant institution of plans to address the systemic causes of potential flooding merely postpones later incorporation of such actions. If the impetus to move forward with such plans happens to be a flood event that wreaks disaster upon residence of Coconut Grove, then the actual cost of the levee and wall will be substantially above the costs asserted in the FEIS. Avoidance of such costs, whether economic, environmental, or social, should be priority in the Kawainui Marsh Project.

Thank you for the opportunity to comment.

Sincerely,



John T. Harrison
Environmental Coordinator

cc: OEQC
Roger Fujioka
Chris Welch