January 25, 1989
RG:0089

Mr. Donald A. Clegg
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Notification of New Construction
(State Application Identifier No. HI881228-161-0)
Waikakalua Army Family Housing
Central Oahu

The above referenced document provides notification for the construction of 2,287 family housing units to be located at Waikakalua Ammunition Storage Tunnel Site, near Wheeler Air Force Base (WAFB). The review of this document was conducted with the assistance of C. Anna Ulaszewski, Environmental Center.

We generally do not review documents at the notification stage; however, in view of the potential significance of its impacts, we would like to comment on the proposed project. We have reviewed the information provided by the applicant and offer these recommendations in regards to the preparation of the Environmental Assessment:

It is stated that no endangered or threatened species are expected to be affected by the project; however, there is no mention of a study which supports this assumption. If a study was done, this should be cited in the EA; if a study was not done, what is the rationale for this assumption?

This document states that the schools may have insufficient capacity. A study of area schools should be conducted in order to determine the impact of the project on them. If the study indicates that the schools are not able to accommodate the additional enrollment, it will become necessary to look at ways to remedy the situation. The EA should contain this information.
"Preliminary studies indicate a possibility that the Schofield Barracks Wastewater Treatment Plant at WAFB will have sufficient capacity..." We feel that further studies should be conducted in order to determine if this facility does or does not have the capacity to accommodate the additional waste load. If the capacity of the facility is inadequate, alternatives should be considered and addressed by the EA.

A climatological study should be conducted in order to determine if the DOD and Army criteria for justifying centralized air conditioning is met. This project will have impacts on existing energy requirements for the area, and the need for air conditioning will exacerbate the situation. Because of the cumulative impacts of increase growth in Central Oahu, it is important that the issue of energy requirements for this project be addressed in the EA.

According to Question 6 of the application form, affordable housing will be provided to personnel in the lower pay scales. This, of course, is a benefit of the project; however, how will the civilian housing market on Oahu be affected? In view of the undersupply of low cost affordable housing, the impact of this project should be positive; however, this issue should be considered and discussed in the EA.

Thank you for the opportunity to offer these comments, we hope they will be helpful in preparing the "Draft" Environmental Assessment. We look forward to reviewing it.

Yours truly,

John Harrison
Environmental Coordinator

cc: L. Stephen Lau
    C. Anna Ulaszewski