

Proposed edits to clarify permanent and temporary impacts to waters of the U.S.
Replacement language for Page 4-138

A “functional assessment” was also performed for each location where the Project is adjacent to or crosses a Waters of the U.S., as identified in the Wetland Waters of the U.S. Study.

~~As discussed in Section 4.18, the construction phase could directly encroach upon up to 0.20 acre of waters of the U.S.; Once constructed during operation, the Project will permanently encroach upon 0.02 acre of waters of the U.S. from the linear transportation project (See Section 4.14.3). These impacts are from placing structural elements in Waiawa Stream and Springs, Moanalua Stream, Kapalama Canal Stream and Nu`uanu Stream. Although Kalo`i Gulch is likely not under the jurisdiction of the USACE, it was considered in the impact quantities with the use of the “preliminary JD approach” and would add 0.004 acres of impact to waters of the U.S. As discussed in Section 4.18, during construction of the fixed guideway (linear transportation project features), it is anticipated that there will also be a temporary effect of up to 0.20 acre of waters of the U.S.~~

~~To construct the Pearl Highlands Station, the existing stormwater culvert at Waiawa Springs will be improved and extended to reduce ponding at the outfall and avoid erosion around the guideway columns. The culvert improvements will result in 0.06 acre of permanent impacts in waters of the U.S. and no additional temporary impact during construction in waters of the U.S. This is a non-linear project feature.~~

~~Although Kalo`i Gulch will likely be designated non-jurisdictional, another 0.45-39 acre of permanent impact will result from construction of a park and-ride lot at Lower Kalo`i Gulch with an additional 0.86 acres of temporary impact in waters of the U.S. during construction which equals 1.25 acres of total impact caused by non-linear transportation features of the Project. Therefore, if impacts to both Kalo`i Gulch and Waiawa Springs are considered there would be 0.45 acres of permanent impact from non-linear transportation elements.~~

~~and the extension of stormwater outfall in waters of the U.S.~~

~~Given this level of impact to water resources within Honolulu’s urban core, the intent of the functional assessment was to analyze impacts of the aquatic ecosystem to develop mitigation concepts for those waters of the U.S. where impacts could not be avoided and only after impacts were minimized to the extent feasible~~

Proposed edits to clarify permanent and temporary impacts to waters of the U.S.
Replacement language for Page 4-163

Water resource mitigation is being proposed to compensate for the 0.02 acre permanent encroachment from the linear transportation features of the Project and 0.06 acre of impact from other Project elements (culvert improvement at Waiawa Springs) (other project features) of encroachment into waters of the U.S. Construction phase mitigation measures are discussed in Section 4.18. The mitigation measures presented here satisfy the

requirements established by 33 CFR 325 and 332, and 40 CFR 230, “Compensatory Mitigation for Losses of Aquatic Resources.” These mitigation measures are presented only after measures to fully avoid the water features have failed and only after all measures have been taken to minimize encroachment.

Proposed edits to clarify permanent and temporary impacts to waters of the U.S.
Replacement language for Page 4-190

There are several types of temporary construction-phase impacts from the Project on water resources, as follows and as described in Tables 4-36 and 4-37):

- **Placement of Fill in Waters of the U.S.**—the

Project will encroach into a maximum of 0.20 acres of waters of the U.S. temporarily during

construction (Table 4-36) of the guideway. Although Kalo'i Gulch will likely be designated non-jurisdictional, another 0.39 acre of permanent impact will result from construction of a park and-ride lot at Lower Kalo'i Gulch with an additional 0.86 acres of temporary impact in waters of the U.S. during construction which equals 1.25 acres of total impact caused by constructing the park-and-ride lot (Table 4-37). Encroachment will

~~decrease by 0.18 acre from construction to operation, as structures required only during construction are removed from waters of the U.S.~~

- **Stormwater Drainage from Construction**

Sites—prior to the start of construction, a National Pollution Discharge Elimination

Add to beginning of Mitigation section. (page 4-167)

Formatted: Highlight

Although impacts have been determined for Kaloi Gulch, no mitigation has been proposed because it is likely based on verbal consultation with the USACE that Kaloi is not under their jurisdiction. The discussion of mitigation only concerns 0.02 acres of permanent impacts to waters of the U.S. associated with linear guideway and 0.06 acres of permanent impact in Waiawa Stream associated with a culvert at the Pearl Highlands Station.

Change for Construction section 4.18.10

Formatted: Highlight

Under placement of fill –

The project will temporarily encroach into a maximum of 1.45 acres of waters of the U.S. if all project elements are considered (Tables 4-36 and 4-37). If Kaloi Gulch is determined to be non-jurisdictional, the temporary construction impacts to waters of the U.S. will affect 0.12 acres. This impact will be solely from the efforts needed to place columns in streams to support the guideway.

Add to page 4-156 under surface waters.

Formatted: Highlight

However, based on consultation with the USACE, Kaloi Gulch is likely not under their jurisdiction. Therefore impacts to waters of the U.S. will be 0.08 acre for permanent project features and 0.12 acres for temporary construction phase impacts. These permanent impacts are 0.02 acre for columns in the streams and 0.06 acres for a culvert associated with the Pearl Highlands facility in Waiawa Stream.