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Deputy Director of Highways  
Attn: Ed Sniffen  
Aliiimoku Building  
869 Punchbowl Street  
Honolulu, HI 96813

April 6th, 2021

Letter regarding the Makaha Beach Park Petition

Dear Deputy Director Ed Sniffen and all concerned parties,

On behalf of the Wai'anae Community, we are asking that the State Department of Transportation bring to a halt the bridge replacement of (Nos.3 and 3A.) along Farrington Highway, Route 93, between milepost markers number 13.95 and number 14.21 in Makaha, Waianae District, Oahu, Hawaii. The portion of Farrington Highway that comprises the project site is located between Tax Map Keys (TMKs): (1) 8-4-002: Parcel 047 and (1) 8- 4010: Parcel 012. Both parcels are owned by the City and County of Honolulu. We ask that the State Department of Transportation delay this process and reconsider all options to create a feasible plan and investment. To also review, and do an engineering analysis to implement the 1998 Makaha Beach Park Master Plan.

The Wai'anae Community stands firm in belief that the project's temporary bypass road on the makai side of Farrington Highway will place the Mākaha Beaches ecosystem in immediate peril should the "five-year flood level standard" temporary bridges be washed to sea by inland flooding or ocean surge. As we have seen recently on March 25, 2021, how heavy rains caused Mākaha's Streams to breach the sands of Mākaha Beach with its natural flow towards the ocean where the bypass project was set to be constructed. The current plan adjustment is to use prefabricated steel bridges instead of concrete, if these bridges are washed out due to it being built in the same exact location will there be an emergency plan in place. A plan to restore Makaha Beach and accommodate traffic, provide the residents further west of Makaha Beach which will be cut off from receiving emergency services, food, water, traverse to work and school if this highway is destroyed by ocean surge or heavy rains even after the bridges are repaired.

We strongly disagree with the use of the rejected 2011 ("FEA") Design Alternative 3, it was not

considered viable nor feasible.

"While Design Alternative 3 meets the purpose and need of the proposed project to replace the existing deficient bridges, it is not considered a viable nor feasible alternative and is rejected from further consideration based on: (1) the need for acquisition of new highway right-of-way is undesirable because of potential for major economic and social disruption to property owners; and (2) in combination with the need for acquisition of large portions of land, would move a segment of Farrington Highway and the reconstructed bridges closer to the ocean. This Farrington Highway Replacement of Mākaha Bridges No. 3 and No. 3A Final Environmental Assessment 3-5 is undesirable based on existing conditions involving seasonal periods of heavy surf which could damage the new bridges and adjoining segment of the highway and pose an increased and unnecessary risk to public safety." R.M. Towill Corporation (2011).

*Final Environmental Assessment.*

[http://oeqc2.doh.hawaii.gov/EA\\_EIS\\_Library/2011-05-23-OA-FEA-Makaha-Bridges-3-and-3A-Replacement.pdf](http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2011-05-23-OA-FEA-Makaha-Bridges-3-and-3A-Replacement.pdf) PDF download.

How does the Department of Transportation, the City and County of Honolulu, the City Department of Planning and Permitting, the City Department of Design and Construction, City Council, HART, and the State of Hawaii justify continuing with this Design Alternate 3 taking unnecessary risks to public safety or even replacing bridges with the same outcome? The fact of the matter is this realignment project has been around since the '80s which is an ample amount of time to finish a study and obtain adequate funding. It was never made a priority to create a longevity solution but a momentary quick fix, leaving residents taxpayers with a bare minimum and 100 years more of dealing with safety issues and hazards in the long run still not cost-effective.

How does the State Historical Preservation Burial Counsel justify the disruption of Iwi Kupuna for a temporary fix? As stated in the 2011 Federal Environmental Assessment, "The project will most likely adversely affect SIHP 50-80-7-6825 (subsurface cultural layer). These cultural resources will most likely be partially or completely removed by the proposed temporary Farrington Highway detour route." R.M. Towill Corporation (2011). *Final Environmental Assessment.*

[http://oeqc2.doh.hawaii.gov/EA\\_EIS\\_Library/2011-05-23-OA-FEA-Makaha-Bridges-3-and-3A-Replacement.pdf](http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2011-05-23-OA-FEA-Makaha-Bridges-3-and-3A-Replacement.pdf) PDF download.

The Wai'anae Community would like for the City and County of Honolulu and the Department of Facility Maintenance to take corrective action by fault of the City. A statement from 2014, Mākaha Valley Flood Mitigation Study states that "In 2008 after a destructive storm, city crews worked to restore Mākaha Surfing Beach. According to beach user's they witnessed the City crews mistakenly filling in most of the "pond" area, during the beach construction project." As a result of City work, the channel is no longer low enough to serve as a debris catchment function of the original pond area.

Townscape Inc, with assistance of Okihara and Associates, Inc. (2014). *Makaha Valley Flood Mitigation Flood Study.* Public Review Draft Report.

<https://dlnreng.hawaii.gov/fcds/wp-content/uploads/sites/21/2014/09/Public-DRAFT-Makaha-Flood-Report.pdf> PDF download.

The Wai'anae community would like for the City Department of Parks and Recreation to have a scheduled maintenance plan from the Department of Facility Maintenance to keep the natural debris catchment feature and recreation amenity for beach users in accordance with the United State Geological Survey quadrangle map for "WAIANAE, HAWAII" (scale: 1:24,000; 1983) shows the depressional contour extends from the outlet of Mākaha Stream to the outlet of West Mākaha Stream, about 600 feet in length and about 150 feet in width approximately 2 acres. Townscape Inc, with assistance of Okihara and Associates, Inc. (2014). *Makaha Valley Flood Mitigation Flood Study*. Public Review Draft Report.  
<https://dlnreng.hawaii.gov/fcds/wp-content/uploads/sites/21/2014/09/Public-DRAFT-Makaha-Flood-Report.pdf> PDF download.

How does the Department of Transportation justify the adverse effect this bypass and reconstruction of new bridges will have on the historic fishpond which holds federally endangered and endemic species? Realignment the bridges would allow the Fishpond to be restored as it was highly suggested by DLNR and the Wai'anae Community. The Wai'anae community would like to urge the City and the State to aid the restoration effort of our historic fishpond to protect our rich history and employ conservation techniques and efforts for generations to come, this can only be done by implementing the 1998 Mākaha Beach Park Master Plan and the Realignment of Farrington Highway.

We would like for the "State Department of Transportation" to reallocate the 19.3 million dollars in federal funds towards realigning Farrington Highway and for the City and County of Honolulu to take procurement procedures of Kili Drive. Kili Drive's connection to Farrington Highway, was never properly vetted by DPP, nor approved by the State Highways Director and did not meet the C&C detailed Land Use Map, required the addition of unapproved fill to raise the elevation of Kili Drive, creating an unauthorized dam within the floodway, permanently blocking floodwaters from their natural path and preventing the free flowage of water in the Makaha Streams; a violation which can be resolved by relocating or redesigning the bridges further inland as the community desires since the late '80s.

The Wai'anae community also requests that the Oahu Metropolitan Planning Organization continues with the preferred proposal by the U.S. Army Corps of Engineers in November 1985 ("EIS"), to realign Farrington Highway on the ma uka (i.e. "mountain") side of the proposed project site. This is the only Highway on Oahu that traverses through a City Beach Park, which poses so many safety concerns such as unsafe parking, sidewalks, or paths for bicyclist, recreational runners, it's also not ADA compliant for wheelchairs and scooters, and people who are walking to the beach to swim or surf. It is a constant danger to stand on the side of the road to go into your parked car. People have been run over due to the wind generated by the Buses, this wind sucks them into the underside of the Bus, more recently a motorcycle fatality due to speeding on this straightaway, a family waiting to catch the bus was involved in a hit and run one fatality and 3 injured. We would also like for the Department of Transportation to continue to fund the feasibility study of the realignment of Farrington Highway incorporating the 1998 Makaha Beach Park Master Plan into a feasible plan. The Stated benefits of this realignment were: 1) increased recreational use and properly functioning comfort station, 2) expansion of the beach, 3) additional parking for a beach park currently with extremely

limited parking, to the point where people must park illegally on the sand, 4) elimination of highway repairs due to beach erosion and storm waves, and 5) insured access in and out of the west end of the island of Oahu. Townscape Inc, with assistance of Okihara and Associates, Inc. (2014). *Makaha Valley Flood Mitigation Flood Study*. Public Review Draft Report.  
<https://dlnreng.hawaii.gov/fcds/wp-content/uploads/sites/21/2014/09/Public-DRAFT-Makaha-Flood-Report.pdf> PDF download.

We the people necessitate that the City and County of Honolulu, Oahu Metropolitan Planning Organization, Honolulu Authority for Rapid Transportation, the Department of Transportation, and the State of Hawaii listen to the community! The aforementioned has been going on since 1988, there have been multiple petitions from Save Makaha Beach, Malama Makaha, Bicycle Riding League, Makaha Civic Club, Waianae Civic Club, Makaha Beach Surf Club, Buffalo Keaulana, and family with well over 2000 signatures which will be attached along with this letter.. These groups stand in solidarity against the bridge replacement, and the Highway being run through Makaha Beach, and strongly against a bypass road built over or around Iwi Kupuna. The people of this community demand that our voices be heard, and the necessary actions are taken by the State of Hawaii, all departments and agents of the State, the City and County of Honolulu, and agents of the City, to meet the demands and common-sense requests of the Community by following the terms listed in the petition and stated within this letter.

Mahalo Nui on behalf of the Wai'anae Community,

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CC:

Board of Water Supply  
City and County of Honolulu, City Council Andria Tupola, District 1  
City and County of Honolulu, City Council Augie Tulba, Parks and Recreation Committee City and County of Honolulu, Department of Transportation (DTS)  
City and County of Honolulu, Department of Parks and Recreation, Louis Chung, District Regional Manager 2  
Department of Planning And Permitting, Dawn Takeuchi Apuna  
Federal Highway Administration  
Honolulu Authority for Rapid Transportation,  
Representative Cedric Gates, District 44  
Office of Inspector General  
Oahu Metropolitan Planning Organization  
State of Hawaii, Governor David Ige  
State of Hawaii, Department of Land and Natural Resources, Susanne Case State  
Department of Transportation, Ed Sniffen  
State Historic Preservation, Alan Downer  
Senator Maile Shimabukuro, District 21  
Waianae Neighborhood Board No. 24