

BILL022(25)
Testimony

MISC. COMM. 267

BUDGET (BUD)

BUDGET (BUD) Meeting

Meeting Date: May 12, 2025 @ 10:00 AM

Support: 3

Oppose: 1

I wish to comment: 2

Name: Frank Doyle	Email: doylef002@hawaii.rr.com	Zip: 96825
Representing: Self	Position: I wish to comment	Submitted: May 9, 2025 @ 02:36 PM
Name: Rick Egged	Email: tmawaikiki@gmail.com	Zip: 96815
Representing: Waikiki Transportation Management Association	Position: Support	Submitted: May 9, 2025 @ 03:03 PM
Name: Carla Houser	Email: chouser@rysehawaii.org	Zip: 96814
Representing: Self	Position: Support	Submitted: May 9, 2025 @ 03:40 PM
Name: Daniel Dinell	Email: ddinell@treesforhonolulu.org	Zip: 96822
Representing: Trees for Honolulu's Future	Position: I wish to comment	Submitted: May 10, 2025 @ 04:12 PM
Name: Lisa Bishop	Email: lisa.fohb@gmail.com	Zip: 96825
Representing: Friends of Hanauma Bay	Position: Support	Submitted: May 11, 2025 @ 03:46 PM
Name: Natalie Iwasa	Email: iwasajunk@mail.com	Zip: 96825
Representing: Self	Position: Oppose	Submitted: May 11, 2025 @ 10:27 PM

Chairman Dos Santos-Tam
Members of the Budget Committee

May 9, 2025

My name is Frank Doyle, and I am a member of a group of science and engineering colleagues seeking to reinstate the 301(h) Waiver from secondary treatment for Sand Island Wastewater Treatment Plant (SIWWTP) that was originally included in the City's NPDES Permit for that facility. The proposed expenditure of \$2.5 billion dollars for secondary treatment at Sand Island is an unjustified EPA policy mandate included in the 2010 Consent Decree and provides little if any benefit to our present wastewater treatment process which has been in operation for the past 40 years.

Our group supports Council Resolution 287 "urging the Administration to initiate discussions with the U.S. Environmental Protection Agency, the State of Hawaii Department of Health and other pertinent parties to terminate, modify or extend the compliance deadlines of the 2010 Consent Decree relating to the City and County of Honolulu Wastewater system". By this action the Council is basically seeking relief from the 2010 Consent Decree requirements and specifically the requirement to provide secondary treatment of sewage at the SIWWTP. The removal of the requirement to provide secondary treatment at the SIWWTP would reduce the cost of the Sewer Fee increase by approximately 25 percent.

To assist in initiating discussions with the EPA we have sent the letter below to the EPA Municipal Ombudsman requesting detailed guidance on the required steps for the City to obtain a waiver from secondary treatment at Sand Island. The letter suggests two possible pathways to terminate, modify, or extend the compliance deadlines of the 2010 Consent Decree. Consent Decree Paragraph 97 MODIFICATION states that the terms of this Consent Decree, including compliance schedules, may be modified, as provided in this Paragraph. The Water Infrastructure Improvement Act (HR 7279) permits municipalities to use Integrated Planning to comply with Clean Water Act (CWA) requirements.

We are encouraged that through these two processes, the City may revisit its CWA obligations and schedules for both wastewater and storm water to rearrange projects that prioritize community defined objectives and maximize their investments to achieve greater water quality and human health benefits.

Understanding it will take time to obtain the Waiver from secondary treatment, we request that the funding of both design and construction work for secondary

treatment at Sand Island be suspended until Resolution 287 discussions take place and EPA provides the guidance on the required steps for the City to obtain a waiver from secondary treatment at Sand Island.

The Sewer Fee can therefore be raised sufficiently to cover all other sewer system costs as required.

Respectfully submitted,

Frank J, Doyle PE

Jamie Piziali, Municipal Ombudsman
Office of the Municipal Ombudsman
U.S. Environmental Protection Agency
Piziali.Jamie@epa.gov

Aloha Municipal Ombudsman Piziali,

My name is Frank Doyle, I am currently a member of the Department of Environmental Services' Sewer Fee Advisory Group for the City and County of Honolulu (CCH). During my 42 years of satisfying and rewarding service to the CCH, I served as the Director of the Department of Environmental Services, as well as Chief of the Divisions of Collection System Maintenance and Wastewater Treatment and Disposal. I am presently collaborating with a group of science and engineering colleagues seeking to reinstate the 301(h) Waiver from secondary treatment for Sand Island Wastewater Treatment Plant that was originally included in the City's NPDES Permit for that facility.

We understand that we may request the assistance of the Municipal Ombudsman when we have not had success with the existing EPA avenues for addressing our Clean Water Act concerns. Over the past 20 years, we have requested in writing and oral testimony to the Federal, State and City governments that the 2010 Consent Decree requirement be removed and the Waiver from secondary treatment be reinstated. To date, our concern has not been resolved through regular avenues, and therefore our request for assistance to you. This letter provides our argument for the reinstatement of the Waiver and, given the new administration's effort to reduce wasteful spending, the opportunity for private citizens to make our appeal and for it to be heard.

In 2010, the CCH was required to enter a Consent Decree with the EPA mandating

secondary treatment at the Sand Island WWTP by 2035. Since 1981, this treatment plant has been providing advanced primary treatment with its effluent being discharged into the deep ocean, approximately 1.5 miles offshore at a depth of 240 feet. Until 2010, the Sand Island WWTP operated under an EPA permit that waived secondary treatment because CCH was able to demonstrate no harm to public health or the ocean environment resulting from advanced primary treatment and deep ocean discharge. Over the past 40 years, oceanographic monitoring has confirmed these findings. Additionally, the CCH has not been cited for any public health issues in the near shore waters of Māmalā Bay, nor for any environmental impacts within the zone of mixing at the effluent discharge. This validates there are no public health or environmental issues to be mitigated by the addition of secondary treatment at Sand Island WWTP.

Since entering the Consent Decree, the City has completed billions of dollars of improvements to sewer collection system and treatment plant operations and has essentially complied with the Decree requirements except for its largest project, secondary treatment at Sand Island remaining. During negotiations and after the Consent Decree was enacted, argument has been made that secondary treatment was unjustified.

Despite all the evidence presented, the EPA denied the CCH's application for a 301 (h) waiver from secondary treatment at Sand Island WWTP in 2010. This denial was based on the agency's unfunded mandate for secondary treatment at all municipal sewage treatment plants throughout the United States regardless of unique geographic circumstances. The Alliance of EPA Regulators and various Environmental groups that advocate for increased regulation, including Best Available Treatment, has over the past 50 years placed a tremendous financial burden on communities throughout the country by calling for increased regulation of air, water and sewage facilities, without exception. In some cases, such as Sand Island WWTP, the regulations have been unwarranted, costing taxpayers billions of dollars at the State, County and City government levels. In addition, the annual and ever-increasing costs for operating and maintaining these facilities to meet these requirements are very expensive, and in some cases unaffordable to many communities.

At Sand Island WWTP, Phase I construction of secondary facilities to treat 20 million gallons per day is underway at a cost of \$500 million. Phase II will expand secondary capacity to 80 million gallons per day at an estimated construction cost of \$2.5 billion, which will add unwarranted and unjustified financial burdens to taxpayer financial woes in perpetuity. As a group of Hawaii environmental scientists and wastewater engineers, we are requesting EPA and if necessary,

Congress, to reinstate the CCH's previous 301 (h) Permit Waiver of secondary treatment at Sand Island WWTP, like that accomplished by the City of San Diego in 2019. At that time, San Diego obtained an exemption to the Clean Water Act for its Point Loma Plant effluent discharge and was able to reinstate the Permit Waiver for secondary treatment for that plant. We understand there are wastewater treatment facilities in Alaska, Maine and the territories of American Samoa and Guam that have Waivers from secondary treatment as well.

Our group seeks to remove these unjustified regulations that ignore the science underlying the unique oceanographic features associated with the Sand Island WWTP. The cost of secondary treatment at the Sand Island WWTP cannot be justified based on public health and environmental protection, which can be the only basis for justifying a project of this costly magnitude.

In its effort to reduce proposed Sewer Fee charges, the Honolulu City Council on December 11, 2024, adopted Resolution 287 "urging the Administration to initiate discussions with the U.S. Environmental Protection Agency, the State of Hawaii Department of Health and other pertinent parties to terminate, modify or extend the compliance deadlines of the 2010 Consent Decree relating to the City and County of Honolulu Wastewater system". By this action the Council is basically seeking relief from the 2010 Consent Decree requirements and specifically the requirement to provide secondary treatment of sewage at the SIWWTP. The removal of the requirement to provide secondary treatment at the SIWWTP would reduce the cost of the Sewer Fee increase by approximately 25 percent.

Our group supports Council Resolution 287. Further we believe that Consent Decree Paragraph 97 MODIFICATION may well serve as a vehicle for the City Administration to move forward with Council Resolution 287. Paragraph 97 states: "The terms of this Consent Decree, including compliance schedules, may be modified, as provided in this Paragraph, by a subsequent written agreement signed by the United States, the State, and CCH. Time extensions and modifications to proposed project scopes shall not be construed as material modifications to this Consent Decree. Any non-material modifications to the Consent Decree may be made, without Court approval, by a written agreement signed by the United States, the State, and CCH, and shall be effective upon service to all the Parties; provided, however, the Intervenor may raise the issue of the materiality of the modification by invoking dispute resolution pursuant to Section XII (Dispute Resolution) of this Decree."

In addition, we understand that the Water Infrastructure Improvement Act (WIIA) (HR 7279), allows municipalities to use Integrated Planning to meet CWA requirements. The City Department of Environmental Services (ENV) has completed its Integrated Planning Feasibility Study Final Report which recommended ENV pursue an integrated planning process. It is our understanding that ENV intends to prepare a more comprehensive and detailed Integrated Planning document. We are encouraged that through this process the CCH may revisit its CWA obligations and schedules for both wastewater and storm water to rearrange projects that prioritize community defined objectives and maximize their investments to achieve greater water quality and human health benefits. We are confident that through the Integrated Planning process, the EPA's review of Consent Decree requirements, for Honolulu and other Cities, may save millions in unjustified expenditures and provide real benefits for dollars spent.

As private citizens who have a deep concern for our community, we believe we have a right to expect responsible stewardship by our governmental leaders and therefore are reaching out to you with our concerns. Kindly provide detailed guidance on the required steps for the City to obtain a waiver from secondary treatment at Sand Island.

Colleagues in our group who have endorsed this letter include:

Dr. James Kumagai, PhD, PE

- Former Deputy Director of Environmental Programs, Hawaii Department of Health
- Principal Investigator, Water Quality Program for Oahu (1971)
- WEF Fellow

Mr. James Honke, MS, PE

- Retired Chief of the Wastewater Division of the Department of Design and Construction, City and County of Honolulu

Dr. Hans Krock, PhD, PE

- Emeritus Professor of Ocean and Resources Engineering, University of Hawaii at Mānoa
- Architect of Water Quality Standards for the State of Hawaii

Mr. Frank Doyle, MS, PE

- Former Director of the Department of Environmental Services, City and County of Honolulu

Dr. Roger Fujioka, PhD

- Retired Director of the Water Resources Research Center, University of Hawaii at Mānoa

Dr. Victor Moreland, PhD, PE

- Former Research Associate at the Water Resources Research Center, University of Hawaii at Mānoa
- Certified Grade 4 Wastewater Treatment Plant Operator, State of Hawaii

Mr. Eassie Miller, MS, PE

- Former Wastewater Operations Superintendent, City and County of Honolulu
- Former Chief of the Division of Wastewater Reclamation, County of Maui
- Certified Grade 4 Wastewater Treatment Plant Operator, State of Hawaii

Dr. Michael J. Chun, PhD, PE

- Former Director of Public Works, City and County of Honolulu

Mahalo nui loa for hearing our concerns and for any guidance you can provide to our group as we continue to press forward with this matter.

Me ka haahaa,

Frank Doyle

Waikīkī Transportation Management Association Special Improvement District



*Making Waikīkī better
...one curb at a time.*

May 12, 2025

The Honorable Tyler Dos Santos-Tam
Chair, Committee on Budget,
and Members of the Honolulu City Council
530 South King Street, Room 100
Honolulu, HI 96813

ATTENTION: Office of the City Clerk, Information Section

SUBJECT: Bill 22 (2025), CD1, **Requested Amendment Support**

Dear Chair Dos Santos-Tam and Councilmembers,

The Waikīkī Transportation Management Association (WTMA) Special Improvement District requests your positive consideration of the proposed amendment to Bill 22, CD1, relating to the Executive Operating Budget and Program for the Fiscal Year July 1, 2025 to June 30, 2026 submitted by Council Chair Tommy Waters to provide \$200,000 for Centennial Park Bus Staging Project matching funds. The proposed amendment is attached.

This letter is to support the proposed amendment and confirm the WTMA will provide an equivalent amount of funding to design and construct the project. We anticipate the completion of the Centennial Park Bus Staging Project within six months from the commitment and release of these matching funds to the WTMA. The project will greatly improve traffic circulation in Waikīkī for its residents and visitors. The Centennial Park Bus Staging Project is described on pages 32 and 33 in WTMA's Annual Report to the Honolulu City Council for FY 2023-2024 dated May 2024 (see: City Council communication M-0274(24)).

We appreciate Chair Water's submission of this proposed amendment and his active support of WTMA projects and programs. The WTMA represents an excellent example of a successful public-private partnership that benefits us all.

I would be pleased to meet with any Councilmember who desires further background on the work of our WTMA. Thank you for your support.

Sincerely yours,

Rick Egged, President
Waikīkī Transportation Management Association Special Improvement District

Attachment: Executive Operating Budget, Proposed Amendment to Bill 22, CD1 (2025),
Page #3 of #5 submitted by Councilmember Tommy Waters,
Centennial Park Bus Staging Project matching funds.

Cc: WTMA Board of Directors

EXECUTIVE OPERATING BUDGET

PROPOSED AMENDMENT TO BILL 22, CD1 (2025)

PAGE:	Page #3 of #5
DATE:	4/28/2025
COUNCILMEMBER:	Tommy Waters
STAFF & PHONE EXT:	Alika Ke-Paloma Ext. 85034
FUNCTION:	Public Safety
PROGRAM:	Traffic Control
DEPARTMENT:	Transportation Services
ACTIVITY:	Transportation Engineering

[illegible]

OPERATING AMENDMENT FORM



Residential Youth Services & Empowerment

PO Box 11662 Honolulu, HI 96828

Dear Chair, Vice Chair, and members of the committee,

My name is Carla Houser, MSW, and I have served on the Board of Parks and Recreation for Honolulu as the Programs, Activities and Events Committee Chair since August 2023. I am testifying today in support of Bill 22 (2025), CD1 and Bill 23 (2025), CD1.

I support the department's efforts to evaluate and find opportunities to make improvements to services and programs the department provides such as Summer Fun and Senior Programs. The board continues to offer support on the department's goals set forth by the Recreation Support Services section to increasing the number of youth served, enhance staffing recruitment, leadership pipelines and provide a quality program aligned to over division-wide standards.

I am confident in the department's abilities to carry out the operations set forth in their budget request and ask for your favorable consideration to fully fund the Park's Department's operating budget.

Thank you for this opportunity to testify.

Carla Houser!

Carla Houser, MSW
Executive Director



Written Testimony before the
HONOLULU CITY COUNCIL
COMMITTEE ON BUDGET
Monday, May 12, 2025 (10:00 AM)

RE: BILL 22 CD1 (2025)–EXECUTIVE OPERATING BUDGET FOR FY 2026

Aloha Committee Chair Dos Santos-Tam and Committee Members:

Trees for Honolulu's Future (TFHF) is a nonprofit organization with a vision for a tree-filled island that preserves and enhances our quality of life, especially in the face of climate change.

Trees create multiple benefits well documented by research. They create shade and use evapotranspiration to lower temperature. Trees recharge groundwater and decrease surface runoff protecting our reefs. Trees trap pollutants and store CO2. Trees calm traffic. They are critical infrastructure. Numerous jurisdictions, including Honolulu, have recognized this, and are making tremendous progress in greening their cities.

In 2018, the City Council unanimously adopted resolution 18-55 setting a goal of achieving 35% urban tree canopy by 2035. In 2023, and again, in 2024, the Council allocated additional funds into the Executive Budget for tree planting. We appreciate the Council putting funding behind your policy directive and specifically in this CD1 for restoring salary funding for a Landscape Architect III (OC1101).

One concern this year is the loss of federal funds in the City's Division of Urban Forestry's (DUF) community forestry program. We understand one of the federal grants received by DUF is currently frozen – our suggestion is that the Council appropriate local dollars until (and if) funding is restored. In such an approach, momentum is not lost, and should the federal dollars flow again, the Department can adjust its spending.

An additional concern beyond the loss of federal funds whether sufficient monetary resources are allocated for replacement of coconut palms removed due to Coconut Rhinoceros Beetle infestation and general maintenance costs. Planting a tree is just the first step, caring for it is the essential next step.

Trees are being planted. Community is being engaged. The City is on the right track. Don't stop now.

Unlike most infrastructure, trees appreciate over time. We thank the hardworking folks at DPR and the Administration, along with the Council, for working to make Honolulu a more livable and resilient city.

Aloha,

Daniel Dinell, President

HONOLULU is HOT TREES are COOL

Visit us: www.TreesForHonolulu.org Contact us: info@TreesForHonolulu.org Voice/Fax/Text: 808-707-6353
P.O. Box 12051, Honolulu, Hawaii 96828



FRIENDS of HANAUMA BAY

CONSERVE • PROTECT • RESTORE

*Dedicated to the conservation of coastal and marine environments,
emphasizing stewardship of the natural resources of Hanauma Bay*

The Honorable Tyler Dos Santos-Tam
Chair, and Members
Committee on Budget
Honolulu City Council
530 South King Street
Room 202
Honolulu, Hawaii 96813

May 10, 2025

Subject: Strong Support for Department of Parks and Recreation April 22, 2025
Request to Amend Bill 22 (2025) Relating to the Executive Operating Budget for Fiscal
Year 2026 (Hanauma Bay Nature Preserve Special Fund [HN])

Aloha Chair Dos Santos-Tam and Councilmembers,

As a result of the recent settlement between the City and Friends of Hanauma Bay which restored \$5,261,500 to the Hanauma Bay Nature Preserve Fund (HN), we have been working with the Department of Parks and Recreation Director (DPR) Laura Thielen and the Department of Budget and Fiscal Services Director Andy Kawano to prioritize needed improvements at the Bay. The improvements we would all like to see accomplished in FY2026 have been identified in DPR Director Thielen's April 22, 2025 letter requesting to amend Bill 22 (2025) by adding \$1.9M to the Hanauma Bay Nature Preserve Fund (HN) for equipment and long needed repairs and maintenance to infrastructure that is in daily use and highly visible to visitors to the nature preserve.

We strongly support these repairs, and urge you to approve DPR's requested amendments. The Hanauma Bay Nature Preserve Special Fund has the funding to support these much needed repairs.

With Aloha,

Lisa Bishop, MS
President

TO: Members of the Budget Committee

FROM: Natalie Iwasa
808-395-3233

DATE: Monday, May 12, 2025

SUBJECT: Bill 22, CD1, Operating Budget - **OPPOSE**

Aloha Chair Dos Santos-Tam and Councilmembers,

Thank you for this opportunity to testify on Bill 22, CD1, the city operating budget..

I oppose the amendment to add cameras at the Hawaii Kai Park and Ride.

A proposed amendment would remove repair funds or the Koko Head stables and move them to the CIP Budget. **Repair work should remain in the operating budget.** I support the \$250,000 in repairs as long as none of that money goes to a paved parking lot. Paving over the current dirt/gravel lot would require repairs at some point that would generate more construction waste for the PVT landfill. As you know, we currently have problems with capacity. We should be careful not to create a situation in which we will need to add to the landfill, especially when the parking facility we currently have has worked fine for decades and will likely be fine (as long as it holes are repaired in a timely manner).

I also oppose Sec. 12 (o) (and all other related line items), which states general funds may be appropriated for sewer activities. This action may result in lowering of the city's bond rating, which would result in higher interest costs.