

**STATE OF HAWAI'I  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
OFFICE OF CONSERVATION AND COASTAL LANDS  
Honolulu, Hawai'i**

October 10, 2025

145-Day Exp. Date: October 26, 2025

**Board of Land and  
Natural Resources  
State of Hawai'i  
Honolulu, Hawai'i**

**REGARDING:** Conservation District Use Application (CDUA) OA-3984 for the Enterprise Technology Services (ETS) Radio Facility Tower Upgrade Project & Management Plan

**APPLICANT:** State of Hawai'i, Department of Accounting and General Services (DAGS) Enterprise Technology Services (ETS)

**LANDOWNER:** State of Hawai'i

**AGENT:** Carah Kadota, Planner  
Bowers & Kubota Consulting

**LOCATION:** 3286 Round Top Drive, Makiki, O'ahu  
Pu'u 'Ualaka'a State Park

**TMKS:** (1) 2-5-019:003 & 011

**AREA OF  
PARCELS:** 120 acres

**AREA OF USE:** 0.60 acres

**SUBZONE:** Resource

**EXHIBITS:**

1. Aerial layout of proposed project site (Exhibit page 1)
2. Project location and subzone map (Exhibit page 2)
3. Photos of Existing Conditions (Exhibit page 3-4)
4. DAGS Letter Regarding HRS 6E Status (Exhibit page 5)
5. Renderings of proposed tower (Exhibit page 6-8)
6. Tower Plans (Exhibit page 9-12)
7. State Park's Comments and Recommendations (Exhibit page 13-16)

Item K-2

### **SUMMARY (EXHIBIT 1)**

This is a broadband project with an abbreviated CDUA processing timeline of 145-days pursuant to HRS §27-45. The State of Hawai'i, Department of Accounting and General Services (DAGS), Office of Enterprise Technology Services (ETS) is proposing to upgrade the existing radio facility at the Round Top Communication Station site. The project aims to maintain and enhance the functionality and integrity of the Round Top Radio Facility by replacing the two existing 100-foot radio towers with one new 180-foot tower. It will support the current equipment and operations while also accommodating the current and future needs of statewide public safety.

### **DESCRIPTION OF AREA/CURRENT USE (EXHIBIT 2 & 3)**

The project site is located within the Resource subzone of the Conservation District at the Pu'u 'Ualaka'a State Park within the Round Top Forest Reserve. Access to the project site is via Round Top Drive and Nutridge Street. The Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map shows that the project site is designated Zone X, which is determined to be outside of the 1% annual chance floodplain.

The project site is surrounded by forested land along the east, south, and west perimeters with the Nutridge House and undeveloped forested State-owned lands beyond to the north. The park lookout is located approximately 800 feet southwest of the project site with views of leeward O'ahu and downtown Honolulu. There are two public trails and two shelters with picnic tables near the site which is accessible from the parking lot.

TMK: (1) 2-5-019:003 holds two Executive Orders (EO): EO 4314 that set aside land for state park purposes, to be under the control and management of the State of Hawai'i, DLNR, Division of State Parks; and EO 4350 that set aside land for telecommunication purposes, to be under the control and management of the State of Hawai'i, DAGS.

On April 26, 1985, the Board of Land and Natural Resources (BLNR) approved Conservation District Use Permit (CDUP) OA-1724 for an O'ahu-Kaua'i microwave tower and radio system with subdivision and withdrawal of the subdivided area from the Forest Reserve at Tantalus. Subsequent to the approval of CDUP OA-1724, on October 28, 1988, the BLNR imposed a \$500 fine upon DAGS for incorrectly constructing the equipment building and telecommunication facility. Upon compliance of the fine, the BLNR approved the proposed modification to the existing telecommunication facility and subdivision of the property. However, the subdivision action was never completed.

TMK: (1) 2-5-019:011 holds EO 1215 to the City & County of Honolulu for the Master Transmitter Site for public purposes. On October 12, 1973, Conservation District Use Permit (CDUP) OA-444 was approved by the Board of Land and Natural Resources (BLNR) for a Microwave and Transmission Communications System. On August 13, 1993, CDUP OA-2628 was approved for Communication Facilities Upgrades. Then, Site Plan Approval (SPA) OA 19-33 was approved for improvements to the generator and runtime of the facility.

### Flora and Fauna

SWCA Environmental Consultants conducted a biological survey for the project site, which indicated three vegetation types in the project area: ruderal, mixed non-native forest, and landscaped vegetation. Vegetation consists of non-native, weedy, and herbaceous species such as guinea grass; and a canopy of a diverse mix of non-native trees such as ironwood, Formosa koa, macadamia, and silk oak. The understory also consists of trees such as fiddlewood, koa haole, and the octopus tree. All flora identified on-site were non-native, and are not considered to be threatened, or endangered. Additionally, no designated plant critical habitat was identified within the project area.

The SWCA report identified the House finch as the only observed bird listed by the Migratory Bird Treaty Act and is a non-native introduction. No State or federally listed threatened, endangered, or candidate animal species were observed on the project site.

Due to the presence of woody vegetation, there is potential for the Hawaiian Hoary Bat to occur within the project area, however none were identified during the fauna survey.

The USFWS Pacific Islands Fish and Wildlife Office and Division of Forestry and Wildlife responded to pre-consultation for the EA. Review of the State's critical habitat data and the resources available on the USFWS information for Planning and Consultation website revealed the project site is not within or adjacent to any identified habitats for protected species.

### Historical & Cultural Resources

An archeological literature review and field inspection (LRFI) was conducted by Nohopapa Hawai'i LLC in September 2021. The LRFI documented accounts of cultivation near the project site during the time of Kamehameha I. The site was famous in the annals of Hawaiian agriculture because Kamehameha I established his own plantation of sweet potatoes on the steep slopes. Land Commission Award (LCA) documentation shows evidence of dry and wet agriculture of kalo and sweet potato cultivation. In 1904, the upper Makiki area was designated to be a forest preserve. By 1957, the Makiki-Tantalus State Park was established, including the Pu'u 'Ualaka'a State wayside.

The 'Ualaka'a trail connects to the project site and is an established trail that would have been well used in pre-contact times. The trail is not formal in architecture and has not been given a formal State Inventory of Historic Places (SIHP) number, however, it was assumed to be used throughout history and continues to be used today.

Previous archaeological inventory survey was conducted in 1994 which included the project site. No historic properties were found at the project site. It is assumed that the agricultural production and recreational use of the project site may have destroyed any archaeological site that may have formerly existed on the slopes or summit of the project area.

In 2010, Cultural Surveys Hawai'i completed an LRFI for the installation of the Round Top Radio Facility Building addition, in which no historic properties were found within the project area.

Regarding compliance with HRS Chapter 6E-8, DAGS has submitted a request for determination letter to State Historic Preservation Division (SHPD) regarding the project, on January 6, 2025. A follow up email from DAGS to SHPD was sent on June 16, 2025, to request a status update of the submittal, however no response has been received. DAGS produced a statement on September 22, 2025, regarding the status of their submittal, and respectfully requests that the permitting process continue to move forward. (**Exhibit 4**)

#### **PROPOSED USE (EXHIBIT 5 & 6)**

The proposed project will include a phased approach for the demolition of the existing 100-foot towers and the transition to the new tower. During the first phase, the site will be cleared for the new tower, and approximately 27 trees will be removed. A new concrete foundation will be constructed to accommodate the new tower and then a new 180-foot tower will be built. The foundation will be approximately 1,600 Square feet and will feature approximately 60-foot-deep drilled shafts to support the tower.

Once the new tower is constructed, all State and City antenna equipment will be moved to the new tower and the existing two towers will be demolished. Tree and vegetation trimming will be performed only to the extent needed to ensure the continued operation of the radio facility involving necessary line of sight requirements. A new retaining wall with a chain link fence between 12 to 14 feet high will be installed around the new 180-foot tower, and waterlines serving the comfort station will be rerouted to accommodate the site of the new tower.

A portion of the parking lot is proposed to be closed and used for construction staging, and the comfort station will be closed and inaccessible when the existing waterlines are rerouted. The applicant will coordinate with State Parks to ensure continued service is provided to park visitors and those visiting the surrounding site. Following construction, the parking lot and comfort station will be reopened.

#### Management Plan

The Management Plan aims to minimize the environmental impacts on land by consolidating the site and utilizing the existing telecommunications area that has previously been disturbed by construction activities.

The applicant notes that the State and the City and County of Honolulu will be jointly using the tower to provide communications for agencies whose mission involves first response and public safety. Due to the critical nature of this infrastructure and maintaining its security, the applicant is not open to co-location with commercial entities.

There will be no proposed cost exchange between the State and the City and County of Honolulu. Through a Memorandum of Agreement, access is shared at certain key sites thereby limiting the cost of building new sites, while still offering augmented coverage.

DAGS will be responsible for the repair and maintenance of the proposed tower post construction. Landscaping services will be scheduled quarterly to maintain the site. DAGS

and the City and County of Honolulu will be responsible for inspecting and maintaining their respective radio equipment on the tower. DAGS and the City and County of Honolulu both have existing facilities and equipment that are located separately. These will continue to be repaired and maintained by their respective entities.

Additionally, the new tower will be secured by a new retaining wall and 12 to 14-foot-high chain-link fence that will surround the tower, with a double swing gate to provide access to the tower. The double swing gate will be secured with a pad lock- only DAGS and the City and County of Honolulu, Department of Information Technology facility management staff will be provided with keys to access the tower. DAGS also plans to install a security camera to monitor the facility.

### Mitigation and Best Management Practices

The applicant has identified a number of mitigative measures, conditions and practices within the Environmental Assessment and CDUA related to construction and resource protection to ensure that the proposal will have minimal effects on the natural and cultural resources of the land. These proposed measures, conditions and practices shall be incorporated into the permit. Various BMPs will be installed to control surface water runoff and erosion during construction. A dust control plan and limiting areas of disturbance will be implemented to minimize air quality and fugitive dust impact. To ensure the minimization of spreading invasive plant species, washing and inspecting of equipment and material will occur along with using native Hawaiian plants and inspecting trees proposed for removal for coconut rhinoceros beetles.

Construction noise will be mitigated by scheduling start and curfew times per DOH requirements and within Pu'u 'Ualaka'a State Park hours. Construction equipment will utilize noise suppressant devices, such as mufflers to minimize acoustic impact on the surrounding environment.

To minimize possible effects to the Hawaiian Hoary Bat, no trees taller than 15 feet will be trimmed or removed during the roosting season from June 1 through September 15.

Additionally, nighttime construction is not anticipated for the project. However, should nighttime work occur, it will be avoided during the seabird fledging season from September 15 through December 15 to mitigate any potential impacts to seabirds that may pass through the area at night. In addition, all lights used during nighttime construction would be fully shielded to minimize the attraction of seabirds.

### Alternatives Considered

**No Action:** The existing towers would continue to serve State and City emergency telecommunication facilities as is. Under this alternative, the radio facility would not be able to accommodate additional equipment to serve future needs and expansion impacting ETS's ability to fulfill its responsibility of providing an efficient and effective statewide telecommunications system.

**Construct a Third Tower:** The State tower site capacity would be expanded by constructing a third antenna tower. The construction of an additional tower would require the demolition and relocation of the Pu'u 'Ualaka'a Park comfort station, leaving Park users without a restroom for the duration of construction.

**Reconstruction of State and City Towers:** The State and City towers would be demolished and reconstructed matching the current height of 100 feet. To increase the capacity of the radio facility, both replacement towers would be constructed at a wider width giving a larger visual impact of scenic views. The operating and maintenance costs for two towers are greater than one, which is not favorable for both City and State agencies.

### **SUMMARY OF COMMENTS**

The Office of Conservation and Coastal Lands referred the application to the following agencies for review and comment:

State Agencies:

- DLNR: Engineering, State Parks, O'ahu District Land Office, Forestry and Wildlife, State Historic Preservation Division
- Aha Moku Council & Office of Hawaiian Affairs

County Agencies

- Department of Planning & Permitting, the Honolulu Fire Department, the Honolulu Police Department

This application was forwarded to the McCully-Mō'ili'ili Public Library, the Mānoa Neighborhood Board, the Makiki-Tantalus Neighborhood Board and the Tantalus Community Association. Further, the application was made available on OCCL's website for those who may wish to review it. Additionally, notice of CDUA OA-3984 was published in the June 23, 2025, edition of *The Environmental Notice*.

Comments were received by the following agencies, and summarized by Staff as follows:

#### DLNR- O'ahu District Land Office

Any improvements on lands under the Land Board jurisdiction outside the current set aside area needs a disposition from the Board.

#### Applicant's Response

The applicant is currently in the process of requesting a set aside for the proposed project. DAGS will continue to work with the Department until this matter is resolved.

#### DLNR- Engineering

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high-risk areas) and State projects are required to comply. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation. The official Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM). The Flood Hazard Assessment Tool (FHAT) ([fhat.hawaii.gov](http://fhat.hawaii.gov)) could also be used to research flood hazard information.

### Applicant's Response

The applicant acknowledges the comment regarding compliance with the rules and regulations of the NFIP. The project site is within the Federal Emergency Management Agency's Flood Zone X, which is not designated as a Special Flood Hazard Zone.

### DLNR- State Parks

#### 1. Advance Notice of Project Changes

- State Parks requires 30 days' advance notice for any delays, suspensions, or extensions.
- This allows for adequate park management and proactive response.

#### 2. Sanitation During Construction

- If the permanent comfort station is closed, portable toilets must be provided by ETS or its contractor.
- Ensuring hygiene is essential for visitor satisfaction and continued park use during construction.

#### 3. Accessibility Requirements

- If the comfort station remains open, ADA access and handicap parking stalls must remain functional and accessible throughout construction.

#### 4. Parking Lot Use & Restoration

- State Parks is procuring a vendor for future parking management.
- The 26 parking stalls used for staging over 600 days must be fully restored to original or better condition after the project.
- Restoration includes pavements, curbs, markings, parking stops, and infrastructure.
- Longevity of the parking lot must not be compromised during or after restoration.

#### 5. Relocation of Handicap Parking

- If ADA stalls are used during construction, they must be relocated, restriped, and marked to ADA specifications.
- Signage must also be adjusted accordingly.

#### 6. Restoration of Natural and Built Areas

- All disturbed areas (pathways, fences, vegetation, etc.) must be repaired or replaced post-construction.
- Damaged plants and trees should be replaced with healthy native species.
- Backfilling and surface restoration must ensure stability and appearance.

#### 7. Final Inspection & Monitoring

- A final inspection will be conducted by State Parks to ensure restoration standards are met.
- Parks will monitor the restored areas and request corrections if necessary.

#### 8. Request for Voluntary Contributions

- Although land use and parking fees are typically charged, this project is gratis.
- State Parks requests a “give back” such as ADA upgrades to pavilions or pathway leveling as goodwill.

#### Applicant's Response

The DAGS' contractor will notify the Parks Program Manager 30 days in advance of any delays, suspension, or extension of work.

DAGS is working towards periodically closing the comfort station with advance notice given to State Parks, with the intent of reducing closures where at all possible during construction. Portable toilets, including an ADA-compliant toilet, will be provided when access to the comfort station is not available. During comfort station closure, the contractor will provide three standard and one ADA-compliant portable toilets. The portable toilets will be cleaned and serviced at least twice per week.

ADA access to the permanent comfort station will remain open while the permanent comfort station is open to the public. The existing two ADA stalls and the no parking between stalls must be reserved for the contractor's site access. Two temporary ADA stalls and one temporary no parking space between them will be designated from the existing stalls.

To minimize impacts of the project, DAGS is working with State Parks staff to greatly reduce the number of parking stalls that would be required for construction access and staging. DAGS agrees to restore areas impacted by construction activities to their original condition or better.

However, DAGS notes that fixing ADA access to the pavilion is not feasible with the

amount of funding available for the project. The project serves to support communications whose mission includes first response and public safety, which includes DLNR.

Additionally, DAGS will coordinate with State Parks to schedule a final inspection, and to address any work quality issues after project completion.

#### The Honolulu Fire Department

Requires that all applicable components of the Revised Ordinances of Honolulu Chapter 20 be followed.

#### Applicant's Response

DAGS acknowledges the comment regarding compliance with applicable components of the Revised Ordinances of Honolulu, Chapter 20. A building permit for the proposed project has been obtained by the City & County of Honolulu, DPP, ensuring compliance with all applicable building and fire code provisions.

#### **ANALYSIS**

On June 9, 2025, the Department notified the applicant that:

1. The proposed use is an identified land use in the Resource subzone of the Conservation District, pursuant to the Hawai'i Administrative Rules (HAR), §13-5-22 P-14 TELECOMMUNICATIONS (D-1) *New telecommunications facility. A management plan approved simultaneously with the permit, is also required.* Please be advised, however, that this finding does not constitute approval of the proposal. The Board has the final authority to grant, modify, or deny the proposal;
2. Pursuant to §13-5-40 of the HAR, a Public Hearing will not be required; However, the Chairperson has the authority to require a public hearing should the public interest necessitate it on this application;
3. In conformance with Hawai'i Revised Statutes (HRS), Chapter 343, as amended, and HAR Chapter 11-200.1, the Final Environmental Assessment has been reviewed and accepted by DAGS. Notice was published in the April 8, 2025, issue of the Environmental Notice; and
4. The project does not appear to be within the Special Management Area.

#### **CONSERVATION CRITERIA**

The following discussion evaluates the merits of the proposed land use by applying the criteria established in HAR, §13-5-30:

- 1) *The proposed use is consistent with the purpose of the Conservation District.*

The objective of the Conservation District is to conserve, protect and

preserve the important natural resources of the State through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare. The existing communication facility is part of the City and County of Honolulu's public safety and communications system. This facility is pivotal for interisland communications within the comprehensive public safety and emergency response network known as Hawai'i Wireless Interoperability Network (HIWIN) which helps to support and maintain public health, safety and welfare fulfilling a governmental service for public benefit. The project is not anticipated to cause significant impact to natural resources and will ensure proper mitigative practices and BMPs are implemented.

- 2) *The proposed land use is consistent with the objectives of the Subzone of the land on which the use will occur.*

The objective of the Resource subzone is to ensure, with proper management, the sustainable use of the natural resources of those areas. The proposed use would not adversely impact any natural resources at the project site.

While the new tower will be taller, it will have a narrower overall profile and will utilize colors that blend with the natural forest surroundings to avoid impacts on any identified visual resources of the Tantalus lookout. The proposal does not change the existing uses of the site.

- 3) *The proposed land use complies with the provisions and guidelines contained in Hawai'i Revised Statutes (HRS), Chapter 205A, entitled "Coastal Zone Management", where applicable.*

The proposed project is located 2.6 miles away from the nearest coast and is thereby not anticipated to impact shoreline recreational resources. BMPS will be utilized during construction to minimize impacts on groundwater, surface waters, and coastal waters.

Staff believes the proposed use will not affect recreational or historic resources; nor will the project affect the public's scenic and open space resources. The project related infrastructure is not expected to diminish the overall visual quality of this open space, as the project site is not visible to residents along Round Top Drive and will not interfere with any of the identified visual resources that the Pu'u 'Ualaka'a State Park lookout is known for.

- 4) *The proposed land use will not cause substantial adverse impact to existing natural resources within the surrounding area, community, or region.*

The site is characterized by a forested setting with outdoor facilities and landscaping on the Round Top ridgeline. The proposed project will adhere to BMPs to prevent or mitigate any potential impact on air and water quality during construction. Short-term impacts during construction activities are

anticipated, however, these will end following the completion of the proposed project. The proposed improvements will not have significant impacts to the existing scenic views, and the aesthetic components of the design will blend in with the existing facilities and surrounding environment at the project site.

- 5) *The proposed land use, including buildings, structures and facilities, shall be compatible with the locality and surrounding areas, appropriate to the physical conditions and capabilities of the specific parcel or parcels.*

The proposed action would not change current usage. The proposed project will replace the existing towers with minor modifications essential for the facility upgrades. While the new tower may be more visible from certain vantage points than the existing tower, it will have a narrower overall profile and will utilize colors that blend with the natural surroundings to avoid impacts on any of the identified visual resources of Tantalus.

- 6) *The existing physical and environmental aspects of the land, such as natural beauty and open space characteristics, will be preserved or improved upon, whichever is applicable.*

View planes towards Leeward, O'ahu; downtown Honolulu from the Pu'u 'Ualaka'a State Park; and the Tantalus lookout shall not be affected by the proposed improvements. The project site is located adjacent to the existing Round Top Radio Facility, next to the equipment building. Public views of the existing facility are confined to the adjacent parking lot, mauka views from the park and the Tantalus lookout, and distant glimpse of the upper portions of the towers from distant viewpoints on public roadways.

As previously noted, the new 180-foot tower will be taller than the existing towers, however the project will consolidate the State and City communications equipment onto one tower instead of two. The new tower will also have a narrower profile and will utilize similar colors as the existing towers to blend with the natural surroundings.

- 7) *Describe how subdivision of land will not be utilized to increase the intensity of land uses in the Conservation District.*

No subdivision of land is proposed for this project.

- 8) *The proposed land use will not be materially detrimental to the public health, safety and welfare.*

On-site materials are not identified as hazardous, and these materials will not change following completion of the proposed project. The new tower will be constructed of steel like the existing towers, and able to withstand category four hurricane winds. Therefore, the project is not anticipated to be materially detrimental to public health, safety, and welfare.

The upgrades are needed to meet current and future emergency communication needs for public use and is vital for the welfare and safety of the surrounding community. The proposed action will promote the long-term sustainability of public health, safety, and welfare by ensuring structural integrity after a natural disaster to meet current standards, and the ability to provide service to the region for future emergency situations.

### **CULTURAL IMPACT ANALYSIS**

A Cultural Impact Assessment (CIA) was prepared by Nohopapa Hawai'i LLC spanning from June 2021 through October 2021.

The project site is located approximately 2.4 miles mauka of the southern border of the Ahupua'a of Makiki and. The boundary of the Makiki Ahupua'a is defined by a line of three cinder cones: Pu'u 'Ōhi'a (Tantalus); Pu'u Kākea (Sugarloaf); and Pu'u 'Ualaka'a (Round Top).

Articles IX and XII of the State Constitution, other state laws, and the courts of the State, require government agencies to promote and preserve cultural beliefs, practices, and resources of Native Hawaiian and other ethnic groups.

Based on community consultation, the ongoing cultural practices and resources associated with the area surrounding the project include water reserves, sweet potato cultivation, preserved cultural landscapes, the cinder of 'Ualaka'a, the viewscapes from 'Ualaka'a, network of Hawaiian trails for transport, and the cinder cones as a space for ceremonies. No evidence of traditional cultural practices was found in the direct area of the project site during the assessment.

Access to the Pu'u 'Ualaka'a State Park, nearby trails, or the lookout will not be impeded during or following construction. Additionally, the scenic vista area and view plane will not be impacted or obstructed by the proposed project. The proposed project is not anticipated to impact any of the gathering practices or cultural practices that may be occur within in the surrounding forest.

Based on the findings of the LRFI and the CIA, the applicant believes no traditional or customary Native Hawaiian rights are exercised at the project site, and therefore no additional actions must be taken to protect these rights.

### **DISCUSSION**

The State of Hawai'i, Department of Accounting and General Services (DAGS), Office of Enterprise Technology Services (ETS) is proposing to upgrade the existing radio facility tower at the Round Top Communication Station site. The project aims to maintain and enhance the functionality and integrity of the Round Top Radio Facility by replacing the two existing 100-foot radio towers with a new 180-foot tower. It will support the current equipment and operations while also accommodating the current and future needs of statewide public safety.

This facility is pivotal for interisland communications within the comprehensive public safety and emergency response network, known as the HIWIN. Currently, the existing radio facility is at full capacity and cannot accommodate the additional infrastructure and equipment required for both the HIWIN and the Anuenue Microwave Communication Systems. The two existing towers are fully utilized, leaving no room for expansion. In emergency situations, it is imperative for the State of Hawai'i that both the HIWIN and Anuenue Microwave Communication Systems remain fully operational. Any disruption could severely hinder first responder communications between islands.

The existing tower is unable to support the current needs and requires improvements upon current State standards, public user demands, and technological changes. The proposed project will provide for the future expansion of communication equipment within the existing buildings.

As part of the CDUA requirements for the proposed telecommunications facility, a management plan has been drafted to establish the responsibilities of the applicant and to ensure the facility will be maintained, once construction has been completed. DAGS has established that the project site will be utilized and maintained by DAGS and the City and County of Honolulu, for their respective equipment. Quarterly landscaping services will be scheduled to maintain the site. Additionally, the facility will be secured through the installation of a security camera, and a padlock only accessible to facility management staff.

Staff believes that the project will have negligible adverse environmental or ecological effects provided that best management practices and mitigation measures as described in the application and environmental assessment are fully implemented.

The Division of State Parks provided comments and recommendations regarding the project and possible impacts. Additional proposed conditions have been incorporated below based on comments received by State Parks (see **Condition 20**).

Tree removal in the Conservation District requires that each tree is replaced on a one-to-one basis with trees that are appropriate to the site location with preference to trees that are endemic or indigenous to Hawai'i. Based on consultation with the Division of Forestry and Wildlife (DOFAW), staff notes the following:

The 27 trees proposed for removal should be replaced with woody native species such as koa, hibiscus, and ohia. Woody trees should be replaced with woody trees, as opposed to grass or herbs, in the same area they were removed, to fulfill the same ecological role. Trees should be maintained for 6-12 months as needed, and should remain alive or be replaced again, for 1-2 years after project completion to ensure the replacement has been successful. The OCCL staff requests two reports regarding the replaced trees by the applicant, the first one year after construction, and the second two years post construction.

Conditions 21 and 22 have been incorporated based on State Parks comments and consultation with DOFAW. Staff recommends that the applicant work with the Division of

State Parks to develop a tree replacement plan for the proposed removal of 27 trees and provide evidence of the tree replacement post construction.

The OCCL notes that the HRS 6E-8 review process with SHPD is still in progress.

Pursuant to HRS §6E-8 (a) Review of effect of proposed state projects. Before any agency or officer of the State or its political subdivisions commences any project which may affect historic property, aviation artifact, or a burial site, the agency or officer shall advise the department and allow the department an opportunity for review of the effect of the proposed project on historic properties, aviation artifacts, or burial sites, consistent with §6E-43, especially those listed on the Hawaii register of historic places. The proposed project shall not be commenced, or, in the event it has already begun, continued, until the department shall have given its written concurrence.

DAGS has stated they will continue to consult with SHPD and will comply with the required historic preservation mitigation measures, and requests that the CDUA be approved, so the project may proceed.

Staff recommends that a condition of the permit be that SHPD give its written concurrence prior to construction initiation.

#### **RECOMMENDATION**

Based on the preceding analysis, staff recommends that the Board of Land and Natural Resources APPROVE Conservation District Use Application OA-3984 for the ETS Radio Facility Tower upgrade project and Management Plan by the Department of Accounting and General Services (DAGS) Enterprise Technology Services (ETS) located at 3286 Round Top Drive, Makiki, O'ahu, TMKs: (1) 2-5-019:003 & 011 subject to the following conditions:

1. The permittee shall comply with all applicable statutes, ordinances, rules, and regulations of the federal, state, and county governments, and applicable parts of HAR Chapter 13-5;
2. The permittee shall comply with all applicable Department of Health administrative rules;
3. Before proceeding with any work authorized by the department or the board, the permittee shall submit four (4) copies of the construction plans and specifications to the chairperson or an authorized representative for approval for consistency with the conditions of the permit and the declarations set forth in the permit application. Three (3) of the copies will be returned to the permittee. Plan approval by the chairperson does not constitute approval required from other agencies;
4. Unless otherwise authorized, any work or construction to be done on the land shall be initiated within one (1) year of the approval of such use, in

accordance with construction plans that have been signed by the chairperson and shall be completed within three (3) years of the approval of such use. The permittee shall notify the department in writing when construction activity is initiated and when it is completed;

5. All representations relative to mitigation set forth in the accepted application and environmental assessment for the proposed use are incorporated as conditions of the permit;
6. The permittee shall plan to minimize the amount of dust generating materials and activities. Material transfer points and on-site vehicular traffic routes shall be centralized. Dusty equipment shall be located in areas of least impact. Dust control measures shall be provided during weekends, after hours and prior to daily start-up of project activities. Dust from debris being hauled away from the project site shall be controlled. Landscaping and dust control of cleared areas will be initiated promptly;
7. The permittee shall notify the Office of Conservation and Coastal Lands (OCCL) in writing prior to the initiation and upon completion of the project;
8. The proposed project shall not be commenced, until the SHPD has given its written concurrence;
9. Should historic remains such as artifacts, burials or concentration of charcoal be encountered during construction activities, work shall cease immediately in the vicinity of the find, and the find shall be protected from further damage. The contractor shall immediately contact SHPD (808) 692-8015), which will assess the significance of the find and recommend an appropriate mitigation measure, if necessary;
10. The permittee shall utilize Best Management Practices for the proposed project;
11. During construction, appropriate mitigation measures shall be implemented to minimize impacts to the aquatic environment, off-site roadways, utilities, and public facilities;
12. The permittee understands and agrees that the permit does not convey any vested right(s) or exclusive privilege;
13. In issuing the permit, the department and board have relied on the information and data that the permittee has provided in connection with the permit application. If, subsequent to the issuance of the permit such information and data prove to be false, incomplete, or inaccurate, this permit may be modified, suspended, or revoked, in whole or in part, and the department may, in addition, institute appropriate legal proceedings;
14. Where any interference, nuisance, or harm may be caused, or hazard

- established by the use, the permittee shall be required to take measures to minimize or eliminate the interference, nuisance, harm, or hazard;
15. Obstruction of public roads, trails, and pathways shall be avoided or minimized. If obstruction is unavoidable, the permittee shall provide alternative roads, trails, or pathways acceptable to the department;
  16. The permittee shall obtain a county building or grading permit or both for the use prior to final construction plan approval by the department;
  17. Artificial light from exterior lighting fixtures, including but not limited to floodlights, up lights, or spotlights used for decorative or aesthetic purposes, shall be prohibited if the light directly illuminates or is directed to project across property boundaries toward the shoreline and ocean waters, except as may be permitted pursuant to section 205A-71, HRS. All exterior lighting shall be shielded to protect the night sky;
  18. The permittee acknowledges that the approved work shall not hamper, impede, or otherwise limit the exercise of traditional, customary, or religious practices of native Hawaiians in the immediate area, to the extent the practices are provided for by the Constitution of the State of Hawai'i, and by Hawai'i statutory and case law;
  19. Any landscaping shall be appropriate to the site location and shall give preference to plant materials that are endemic or indigenous to Hawai'i. The introduction of invasive plant species is prohibited;
  20. The permittee shall work with the Division of State Parks to address their concerns regarding the project, as stated in **Exhibit 7**;
  21. The permittee shall submit a landscape plan to OCCL for the replacement of 27 trees, identifying the species of replacement trees on a one-to-one basis and their location prior to construction initiation;
  22. The permittee shall replant the replacement trees prior to the construction completion deadline and shall submit evidence of their survival to OCCL one year after construction completion, and two years after;
  23. The permittee shall ensure that areas that are disturbed or denuded of vegetation shall be planted or covered as quickly as possible to prevent erosion;
  24. Other terms and conditions as may be prescribed by the Chairperson; and
  25. Failure to comply with any of these conditions shall render this Conservation District Use Permit void under HAR Chapter 13-5, as determined by the chairperson or board.

Respectfully submitted,

*Mari Kurosawa*

Mari Kurosawa, Staff Planner  
Office of Conservation and Coastal Lands 長

Approved for submittal:



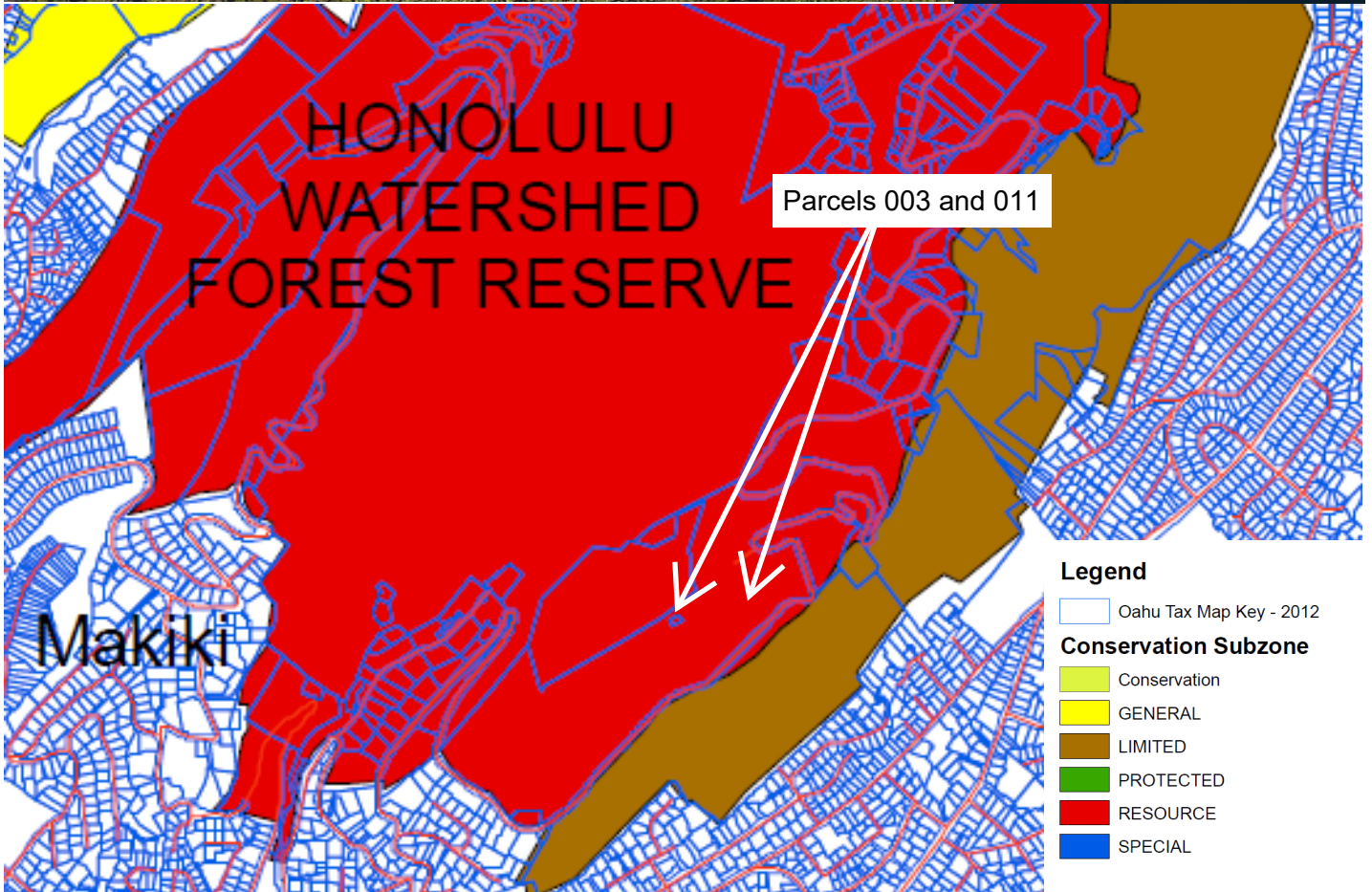
---

DAWN N.S. CHANG, Chairperson  
Board of Land and Natural Resources



**PROJECT SITE**  
**ICSD Round Top**

**Exhibit 1: Aerial Layout of Proposed Project**



**Exhibit 2: Project Location and Subzone Map**



**Exhibit 3: Photos of Existing Conditions**



**Exhibit 3: Photos of Existing Conditions**

JOSH GREEN, M.D.  
GOVERNOR  
KE KIA ĀINA



KEITH A. REGAN  
COMPTROLLER  
KA LUNA HO OMALU HANA LAULĀ

MEOH-LENG SILLIMAN  
DEPUTY COMPTROLLER  
KA HOPE LUNA HO OMALU HANA LAULĀ


**STATE OF HAWAII | KA MOKU'ĀINA O HAWAII**  
**DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ**  
P O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)25.139

**SEP 22 2025**

**MEMORANDUM**

**TO:** Michael Cain, Administrator  
Office of Conservation and Coastal Lands  
State of Hawaii, Department of Land and Natural Resources

**FROM:** Gordon S. Wood   
Public Works Administrator

**SUBJECT:** HRS 6E-8 Historic Preservation Review Information Update  
Conservation District Use Application (CDUA) OA-3984  
ETS Round Top Radio Facility, Tower Replacement  
Tax Map Keys (TMK): (1) 2-5-019:003 (por.) and 011

A Hawaii Revised Statutes (HRS) Chapter 6E-8 submittal was made to the State Historic Preservation Division (SHPD) on January 6, 2025. It has been more than 90 days since our submittal without a concurrence or non-concurrence response from SHPD, and there have been no responses to staff inquiries on the status of SHPD's review.

The Department of Accounting and General Services is committed to ensuring that historic properties and cultural resources are protected in accordance with HRS 6E-8. DAGS will continue to consult with SHPD and will comply with required historic preservation mitigation measures. In the meantime, DAGS respectfully seeks approval of a Conservation District Use Permit so that the project may proceed.

If there are any questions, your staff may contact David DePonte of the Planning Branch at (808) 586-0492, or by email at [david.c.deponte@hawaii.gov](mailto:david.c.deponte@hawaii.gov).

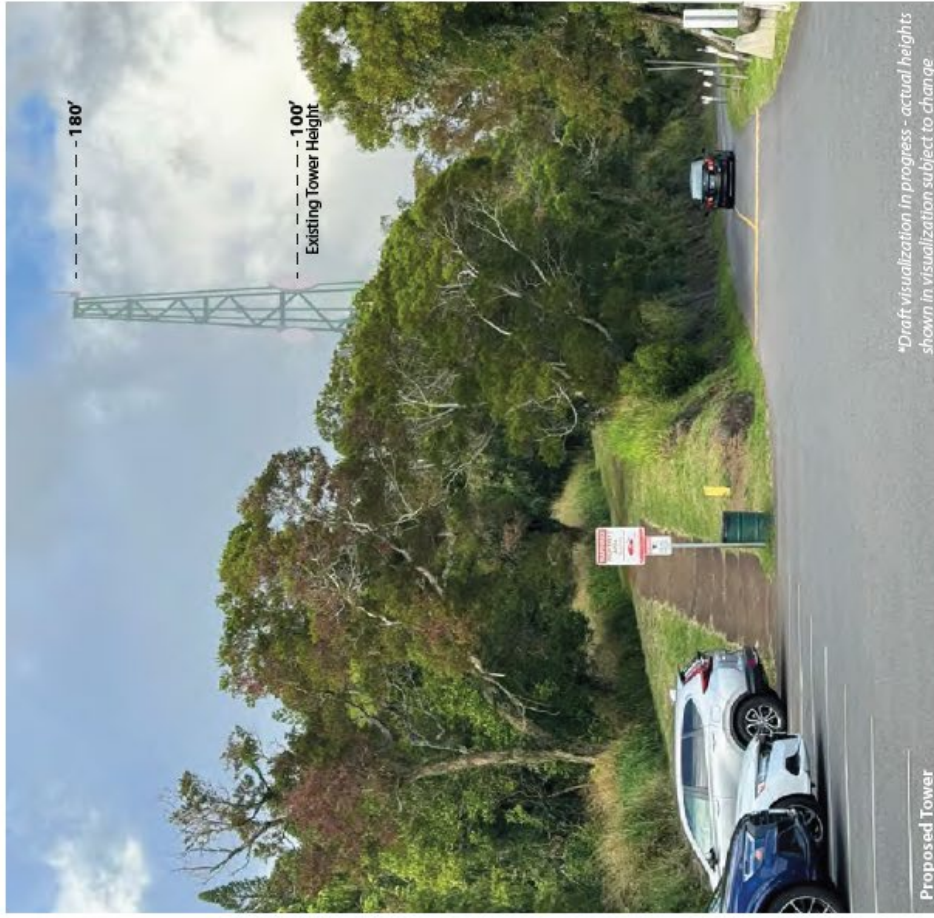
DD:mo

c: Carah Kadota, Bowers+Kubota

**Exhibit 4: DAGS Letter Regarding HRS 6E Status**

Exhibit page 5

View looking mauka from lookout parking lot



*\*Draft visualization in progress - actual heights shown in visualization subject to change*

### Exhibit 5: Renderings of Proposed Tower

View looking makai from tower parking lot

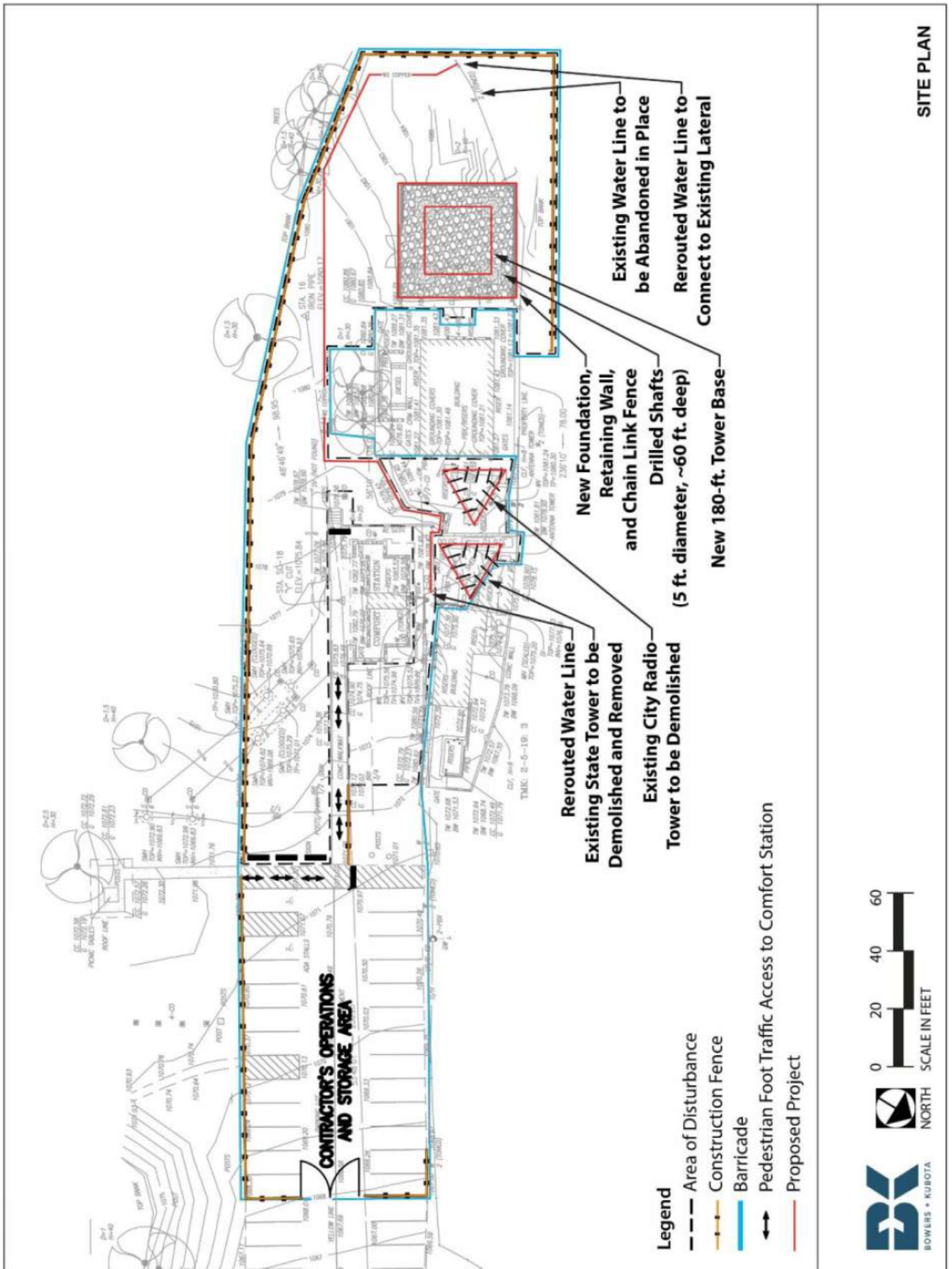


Exhibit 5: Renderings of Proposed Tower

View looking mauka from lookout walkway

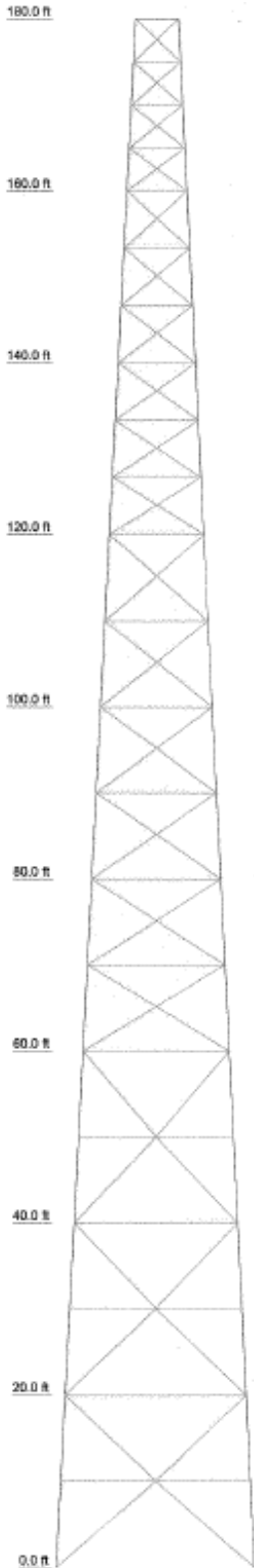


Exhibit 5: Renderings of Proposed Tower



**Exhibit 6: Tower Plans**

Section	T9	T6	T7	T8	T5	T4	T3	T2	T1
Legs	SR 4 1/2	SR 4 1/4	SR 4	SR 3 3/4	SR 3 1/2	SR 3 1/2	SR 2 1/2	SR 2	SR 1 1/2
Leg Grade		L3 12x3 1/2x1/4							
Diagonals		L3 12x3 1/2x1/4							
Diagonal Grade									
Top Chns									
Horizontal		L3 12x3 1/2x1/4							
Sec. Horizontals									
Face Width (ft)	24	18	17	15	13	11	9	7	5
# Panels @ (ft)			12 @ 10				6 @ 8.00087		4 @ 5
Weight (lb) 4500RS.Z	8807.2	4067.4	4070.1	4357.3	4672.2	4998.3	5362.5	5714.4	6063



Tower Steel Preliminary Design

DESIGNED APPURTENANCE LOADING

TYPE	ELEVATION	TYPE	ELEVATION
Omni (3" O.D. x 120" tall, 70 lbs)	180	Face Mount 4' (EPA = 3 sqft frontside, 90lb)	76
Side Arm Mount 4' (EPA = 3 sqft frontside, 90lb)	180	Omni (3" O.D. x 144" tall, 80lb)	76
Omni (4" O.D. x 144" tall, 100lb)	180	Side Arm Mount 8' (EPA = 3 sqft frontside, 120lb)	76
Side Arm Mount 4' (EPA = 3 sqft frontside, 90lb)	180	Omni (3" O.D. x 144" tall, 80lb)	76
4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs) (Future)	170	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	70
Side Arm Mount 4' (EPA = 3 sqft frontside, 90lb)	160	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	70
Omni (4" O.D. x 144" tall, 100lb)	160	10' MW: Paraboloid w/ Cylindrical Shroud (560 lbs)	70
4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs) (Future)	150	Omni (8" O.D. x 120" tall, 125 lbs)	64
4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs) (Future)	130	Side Arm Mount 4' (EPA = 3 sqft frontside, 90lb)	64
Tarana Wireless G1 5Ghz Base Node (16.4"X21.2"x4.6", 42lb)	120	8' MW: Paraboloid w/ Cylindrical Shroud (210 lbs)	63
Tarana Wireless G1 5Ghz Base Node (16.4"X21.2"x4.6", 42lb)	120	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	63
ANT-80GHZ-24-SFS	120	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	63
(2) Small Cone 8" Dia.	103	10' MW: Paraboloid w/ Cylindrical Shroud (560 lbs)	58
4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	98	1' MW: Paraboloid w/ Cylindrical Shroud (10 lbs)	55
8' MW: Paraboloid w/ Cylindrical Shroud (210 lbs)	98	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	53
10' MW: Paraboloid w/ Cylindrical Shroud (560 lbs)	98	Omni (8" O.D. x 144" tall, 150 lbs)	50
Omni (5" O.D. x 144" tall, 150 lbs)	95	Site Camera (10"x10"x10", 3lb)	38
Log Mount Pipe (2" O.D. x 2', 15lb)	95	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	25
Small Cone 8" Dia.	80	RFS BA1012 Omni (1.2" O.D. x 52" tall, 1.3 lbs)	25
WiFi amp (10"x7"x4", 10lb)	80	Side Arm Mount 4' (EPA = 3 sqft frontside, 90lb)	25
Omni (3" O.D. x 144" tall, 90lb)	76	RFS BA1012 Omni (1.2" O.D. x 52" tall, 1.3 lbs)	18
Face Mount 4' (EPA = 3 sqft frontside, 90lb)	76		

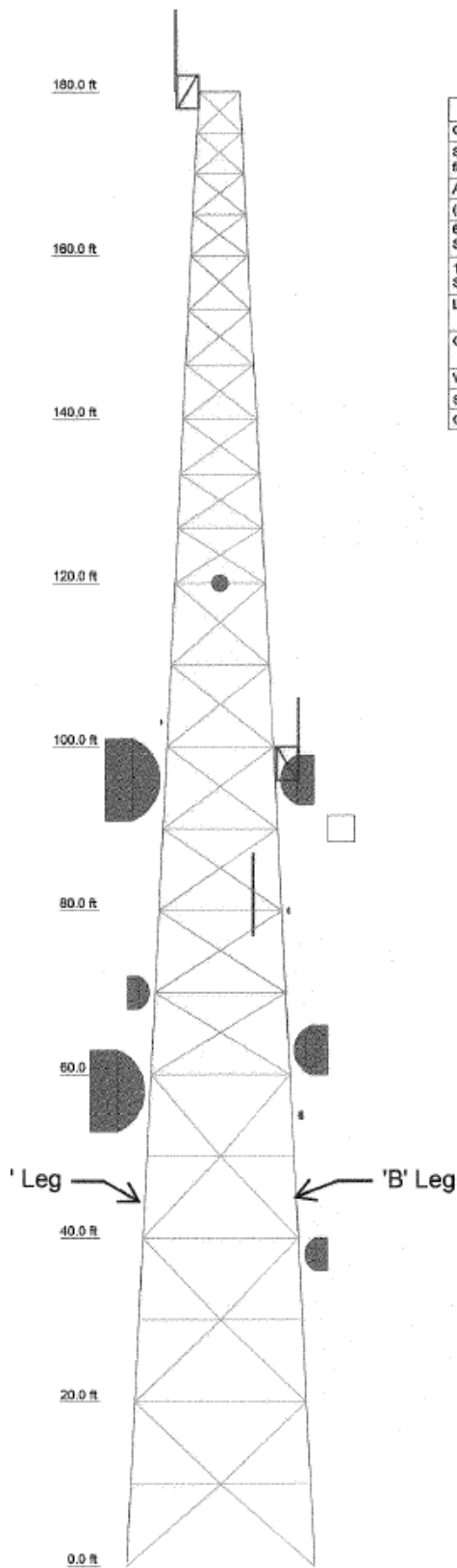
MATERIAL STRENGTH

GRADE	Fy	Fu	GRADE	Fy	Fu
A572-60	50 ksi	65 ksi	A36	36 ksi	58 ksi

TOWER DESIGN NOTES

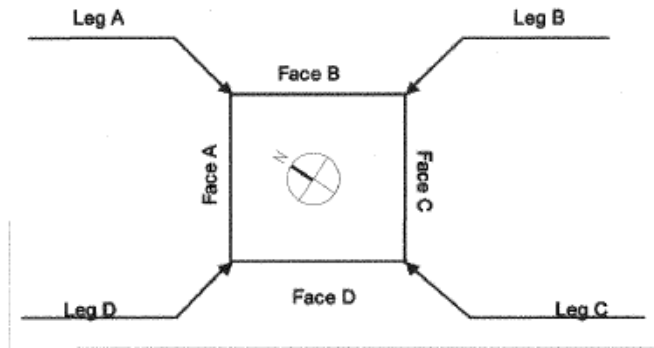
1. Tower is located in Honolulu County, Hawaii.
2. Tower designed for Exposure B to the TIA-222-H Standard.
3. Tower designed for a 200 mph basic wind in accordance with the TIA-222-H Standard.
4. Deflections are based upon a 60 mph wind.
5. Tower Risk Category III.
6. Topographic Category 1 with Crest Height of 0.00 ft

NOTE: PRELIMINARY TOWER STEEL DESIGN - FINAL TOWER DRAWINGS TO BE SUBMITTED SEPARATELY



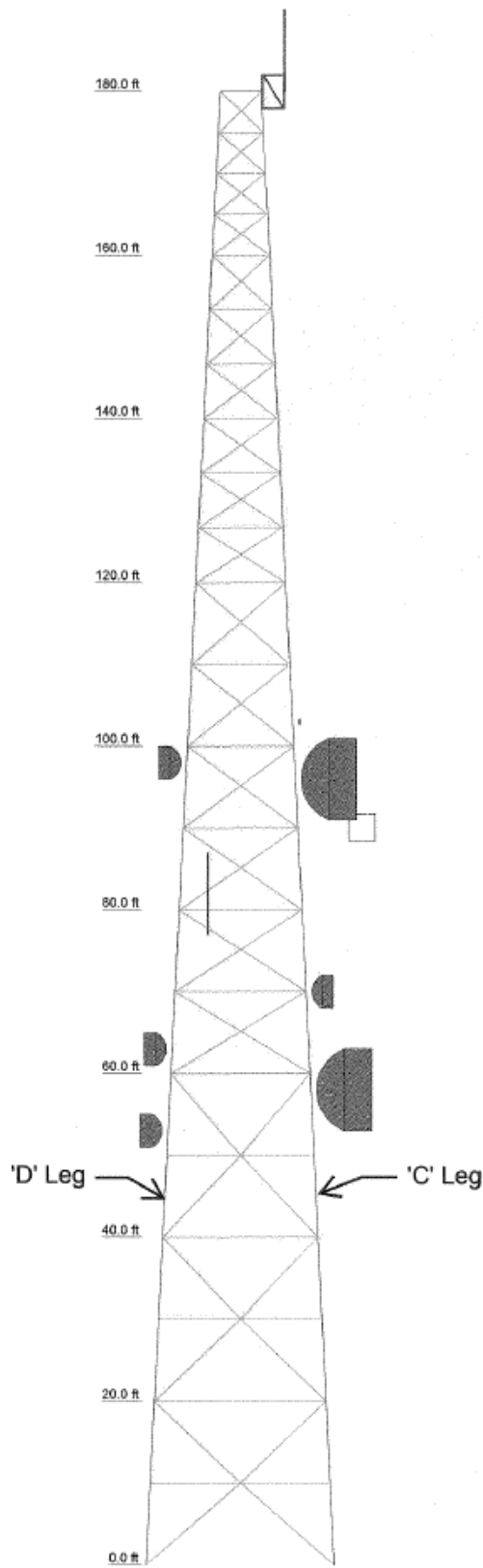
**DESIGNED APPURTENANCE LOADING**

TYPE	ELEVATION	TYPE	ELEVATION
Omni (3" O.D. x 120" tall, 70 lbs)	180	Face Mount 4' (EPA = 3 sqft front/side, 90lb)	76
Side Arm Mount 4' (EPA = 3 sqft front/side, 90lb)	180	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	70
ANT-80GHZ-24-GPS	120	8' MW: Paraboloid w/ Cylindrical Shroud (210 lbs)	63
(2) Small Cone 8" Dia.	103	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	63
6' MW: Paraboloid w/ Cylindrical Shroud (210 lbs)	96	10' MW: Paraboloid w/ Cylindrical Shroud (560 lbs)	58
10' MW: Paraboloid w/ Cylindrical Shroud (560 lbs)	96	1' MW: Paraboloid w/ Cylindrical Shroud (10 lbs)	55
Leg Mount Pipe (2" O.D. x 2', 15lb)	95	Site Camera (10"x10"x10", 3lb)	50
Omni (8" O.D. x 144" tall, 150 lbs)	95	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	38
WiFi amp (10"x7"x4", 10lb)	80		
Small Cone 8" Dia.	80		
Omni (3" O.D. x 144" tall, 80lb)	76		



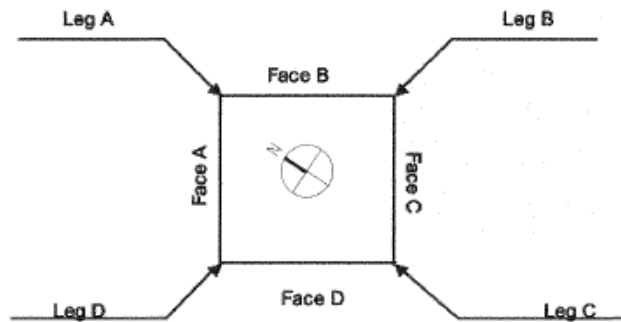
'C' Face View

**Exhibit 6: Tower Plans**



**DESIGNED APPURTENANCE LOADING**

TYPE	ELEVATION	TYPE	ELEVATION
Omni (3" O.D. x 129" tall, 70 lbs)	180	Omni (3" OD x 144" tall, 80lb)	76
Side Arm Mount 4' (EPA = 3 sqft front/side, 80lb)	180	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	70
(2) Small Cone 8" Dia.	103	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	63
4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	96	10' MW: Paraboloid w/ Cylindrical Shroud (560 lbs)	58
10' MW: Paraboloid w/ Cylindrical Shroud (560 lbs)	96	4' MW: Paraboloid w/ Cylindrical Shroud (100 lbs)	53
Face Mount 4' (EPA = 3 sqft front/side, 80lb)	76		



'D' Face View

REV	NO.	DATE
S. L. HO.		

**Exhibit 6: Tower Plans**

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'AINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'AINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA  
Office of Conservation and Coastal Lands  
P.O. BOX 621  
HONOLULU, HAWAII 96809

DAWN N.S. CHANG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
RYAN K.P. KANAKA'OLE  
FIRST DEPUTY  
CIARA W.K. KAHAHANE  
DEPUTY DIRECTOR - WATER  
AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

REF:OCCL:AA

CDUA OA-3984  
Submission Date: June 3, 2025  
145-Day Exp. Date: October 26, 2025  
Jun 10, 2025

MEMORANDUM

To:

State Agencies

- DLNR-Engineering
- DLNR-State Parks
- DLNR-O'ahu District Land Office
- DLNR-Forestry & Wildlife
- DLNR-SHPD
- Aha Moku Council
- Office of Hawaiian Affairs

County Agencies:

- Dept of Planning & Permitting
- Honolulu Fire Department
- Honolulu Police Department

FROM:

S. Michael Cain, Administrator *S. Michael Cain*  
Office of Conservation and Coastal Lands

SUBJECT:

REQUEST FOR COMMENTS  
Conservation District Use Application (CDUA) OA-3984 for the Enterprise  
Technology Services (ETS) Round Top Radio Tower Upgrade

APPLICANT:

State of Hawai'i, Department of Accounting and General Services (DAGS)

TMKS:

(1) 2-5-019:003 & 011

LOCATION:

3286 Round Top Drive, Makiki, O'ahu

PUBLIC HEARING:

N/A


Attached please find our Department's notice to the applicant. CDUA OA-3984 and a link to the Final Environmental Assessment may be found on our website at <https://dlnr.hawaii.gov/occl/current-applications/> We would appreciate your agency's review and comment on this application. If no response is received by July 23, 2025, we will assume there are no comments.

Should you have any questions on this matter, contact Alyssa Accardo at (808) 587-0048 or at [alyssa.m.accardo@hawaii.gov](mailto:alyssa.m.accardo@hawaii.gov).

Exhibit 7: State Park's Comments and Recommendations

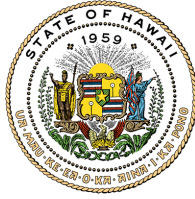
We have no comments

Comments are attached

Signed:   
Print Name: FOR CURT CORRELL  
Division: STATE PARKS  
Date: 7/30/2025

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA

DIVISION OF STATE PARKS  
P.O. BOX 621  
HONOLULU, HAWAII 96809

July 30, 2025

DAWN N.S. CHANG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

RYAN K.P. KANAKA'OLE  
FIRST DEPUTY

CIARA W.K. KAHAHANE  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

S. Michael Cain, Administrator  
Office of Conservation and Coastal Lands

Subject: Division of State Parks' Comments, Conservation District Use Application (CDUA) OA-3984 for the Enterprise Technology Services (ETS) Round Top Radio Tower Upgrade, Pu'u 'Ualaka'a State Wayside, Makiki, O'ahu, Tax Map Key: (1) 2-5-019: Portion of 011

After reviewing the proposed scope of work for the above project, please find below our comments:

1. If there's any potential delays, suspension, or extension of work necessary, State Parks needs to be informed 30 days in advance so we can adjust our park management accordingly. Early notification allows us to understand the situation, make necessary adjustments, and be proactive in addressing issues of concern.
2. Due to the potential closure of the permanent comfort station during the entire construction period, State Parks would like to request ETS or its contractor to provide portable toilets for proper sanitation and hygiene for park visitors. The availability of clean and accessible public restroom facility at the park is a must. Not only does it enhance the overall experience of our visitors but encourages more people to enjoy the park and its amenities, even during the construction period.
3. Should the permanent comfort station remain open during the construction period, the ADA access and the handicap parking stalls must remain open and accessible as well.
4. State Parks is currently soliciting bids for parking management and fee collection services within the park. In the future, the parking facility will be managed by a parking vendor approved by the Board. Since this project requires 26 parking stalls to be used as a staging area for 600 calendar days, State Parks would like to request ETS or its contractor to restore the parking stalls to their original condition **or better** after project completion. Any damages to the pavements, curbs, paint markings, parking stops, and other related infrastructure caused by the use of heavy vehicles, equipment, and the like need to be repaired, rebuilt, cleaned, and returned to original appearance and functionality **or better**. During the restoration period, ETS or its contractor must ensure that the parking lot's longevity is not compromised.

## Exhibit 7: State Park's Comments and Recommendations

5. Since the parking stalls that will be used for the project includes the handicap parking stalls, State Parks would like to request for the handicap parking stalls to be relocated, restriped, and marked as such. The handicap signs will also need to be relocated to ADA specs.
6. Any disturbed areas, including but not limited to pathways, fences, trees, and vegetation should be restored after project completion. Any shrubs, plants, or trees that were damaged during construction need to be replaced with appropriate, healthy specimens. Native plants suitable for the park's environment should be replanted to restore natural landscape. Excavated areas must be carefully backfilled with appropriate materials to ensure stability and prevent future settling. Damaged pathways and fences should be repaired or replaced to their original condition **or better.**
7. After project completion, State Parks would like to conduct a final inspection to ensure all restoration work meets the required standards and is in compliance with any relevant regulations or permits. We will be monitoring the restored area for a period of time to ensure that the restoration is successful. If necessary adjustments are required, we'd like ETS or its contractor to address the matter.
8. We usually charge a fee for the use of land longer than 30 days, as well as the use of parking stalls. The fee varies based on several factors, including the specific location and purpose. Since the fee for this project is gratis, State Parks would appreciate any "give back" from the applicant, such as fixing the ADA access to the pavilions, leveling the pathways, etc.

Should you have any questions, please contact our Lead Property Manager Brigida Ayson at (808) 587-0289 or email [brigida.v.ayson@hawaii.gov](mailto:brigida.v.ayson@hawaii.gov).

Aloha,

  
Fork Curt Cottrell, Administrator  
Division of State Parks999

## **Exhibit 7: State Park's Comments and Recommendations**