



OFFICE OF THE CITY AUDITOR

City and County of Honolulu
State of Hawai'i

Audit of the Department of Parks and Recreation's Camping Operations



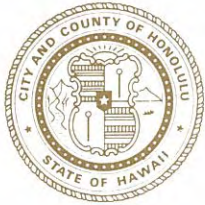
Audit of the Department of Parks and Recreation's Camping Operations

A Report to the
Mayor
and the
City Council
of Honolulu

Submitted by

THE CITY AUDITOR
CITY AND COUNTY
OF HONOLULU
STATE OF HAWAII

Report No. 12-05
October 2012



OFFICE OF THE CITY AUDITOR
CITY AND COUNTY OF HONOLULU

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EDWIN S.W. YOUNG
CITY AUDITOR

October 12, 2012

The Honorable Ernest Y. Martin, Chair
and Members
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawai'i 96813

Dear Council Chair Martin:

A copy of our final report on the Department of Parks and Recreation's Camping Operations is attached. This review was requested by the City Council in Resolution 11-46, CD1 which requested that the city auditor conduct a performance audit of the Department of Parks and Recreation's camping operations.

The objective of the review was to provide the Council additional information on the cost of operations, the condition of the campsite facilities, user demand of the facilities, and the management of the city's camping program.¹ The review was conducted between August 2011 and October 2012 in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

The Honolulu City Council, with the mayor's approval, enacted Ordinance 11-20 to establish a fee structure for the city's camping program and a basis for improving and maintaining city campsites. We found, however, that camping program improvements intended by ordinance are not likely to be achieved.

- More specifically, the parks and recreation department has not yet begun to collect camping permit fees because it implemented an online camping permit system without fee collection capability and opted to amend its camping rules before fee implementation. As a result, the city has foregone over \$366,000 in estimated annual revenue.
- Because camping fees will be deposited into the general fund, rather than a special revenue account or other special fund, the parks and recreation department has no plan for how it intends to make improvements to the camping program.

Furthermore, administrative and convenience fees may be excessive and need to be justified before they are charged to the public. The ordinance's fee structure and the department's interpretation of those fees

¹ The audit sub-objectives were to assess the department's management of the camping operations, including the camping permit application and distribution system, enforcement of camping rules, camp maintenance, and associated costs and revenues. We also reviewed the recently implemented online camping permit system to evaluate the city's compliance with e-commerce requirements and best practices.

are contrary and need to be reconciled. The department's estimates for camping program costs, revenues, and assumptions are inaccurate.

Security and camping facility improvements are top priorities for the camping program. Failure to improve security could result in increased complaints, jeopardize the physical security of campers, and expose the city to potential lawsuits.

Failure to replace and improve camping facilities could exacerbate beach erosion; allow further deterioration of the wastewater and sanitation systems; and expose the city to environmental violations and lawsuits. In addition, potential loss of campsites would result in lost revenues from camping permit fees.

The department has implemented an online camping permit program and hired a camping specialist to focus on the camping program. However, more could be done. The department should establish a formal camping program and a camping manual to standardize camping operations. The department should implement a web-based quality assurance program to improve program quality, and ensure its online camping permit system and third party vendors comply with e-commerce requirements. Failure to address these issues could adversely affect citizen perceptions of the camping program and expose the city to financial losses.

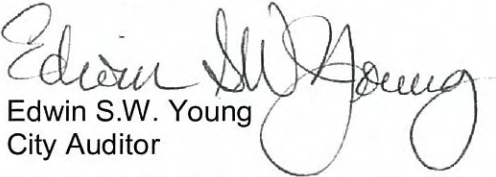
The Department of Parks and Recreation (DPR) through the Office of the Managing Director agreed with most of the recommendations. DPR disagreed with one recommendation related to formalizing the camping program. As anticipated, the Department of Budget and Fiscal Services (BFS) disagreed with two recommendations related to establishing a special fund for camping revenues and proactively addressing e-commerce (PCI-DSS) security requirements that could have financial consequences for the city if the databases are breached. We believe our recommendations are still valid and will become more relevant as the camping program grows as a source of revenues for the city.

Our review covered camping operations data and performance from FY 2008 through FY 2012. For the audit, we focused on the individual and family campsites. As part of our audit work, we inspected all 14 parks that offer camping; inspected restrooms, common areas and parking lots; and surveyed campers applying for city camping permits. We reviewed data provided by the vendor of the city's online camping permit system; observed and assessed the parks and recreation department's cash management practices and controls; reviewed best practices from the Commission for Accreditation of Parks and Recreation Agencies; and compared city camping operations to other jurisdictions. We analyzed information provided by staffs in several departments, including the Department of Parks and Recreation; Honolulu Police Department; Department of Design and Construction; Department of Budget and Fiscal Services; and Department of Information Technology.

The Honorable Ernest Y. Martin, Chair
and Members
October 12, 2012
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We wish to express our appreciation to all these departments, their staffs, and the many others involved with the camping operations for their cooperation and assistance during the review. Our staff is available to meet with you and your staff to discuss the review results, provide more information, or to answer any questions. Please call our auditor-in-charge, Troy Shimasaki, at 808-768-3134 or me at 808-768-3130.

Sincerely,


Edwin S.W. Young
City Auditor

c: Peter Carlisle, Mayor
Douglas Chin, Managing Director
Gary Cabato, Director, Department of Parks and Recreation
Mike Hansen, Director, Department of Budget and Fiscal Services
Louis Kealoha, Chief of Police, Honolulu Police Department
Lori Kahikina, Director, Department of Design and Construction
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Chapter 1

Introduction

City Council Resolution 11-46 requested the city auditor to conduct a performance audit of the Department of Parks and Recreation's camping operations. The city council further requested information regarding the cost of operations, the condition of the campsite facilities, user demand for facilities, and the management of the city's camping program. The audit was conducted between August 2011 and September 2012 in accordance with generally accepted government auditing standards.

Background

Camping is offered at 15 campgrounds at 14 city parks throughout the island of O'ahu. These include 13 beach parks and 1 botanical garden.

Exhibit 1.1 Location of Parks and Recreation Campsites

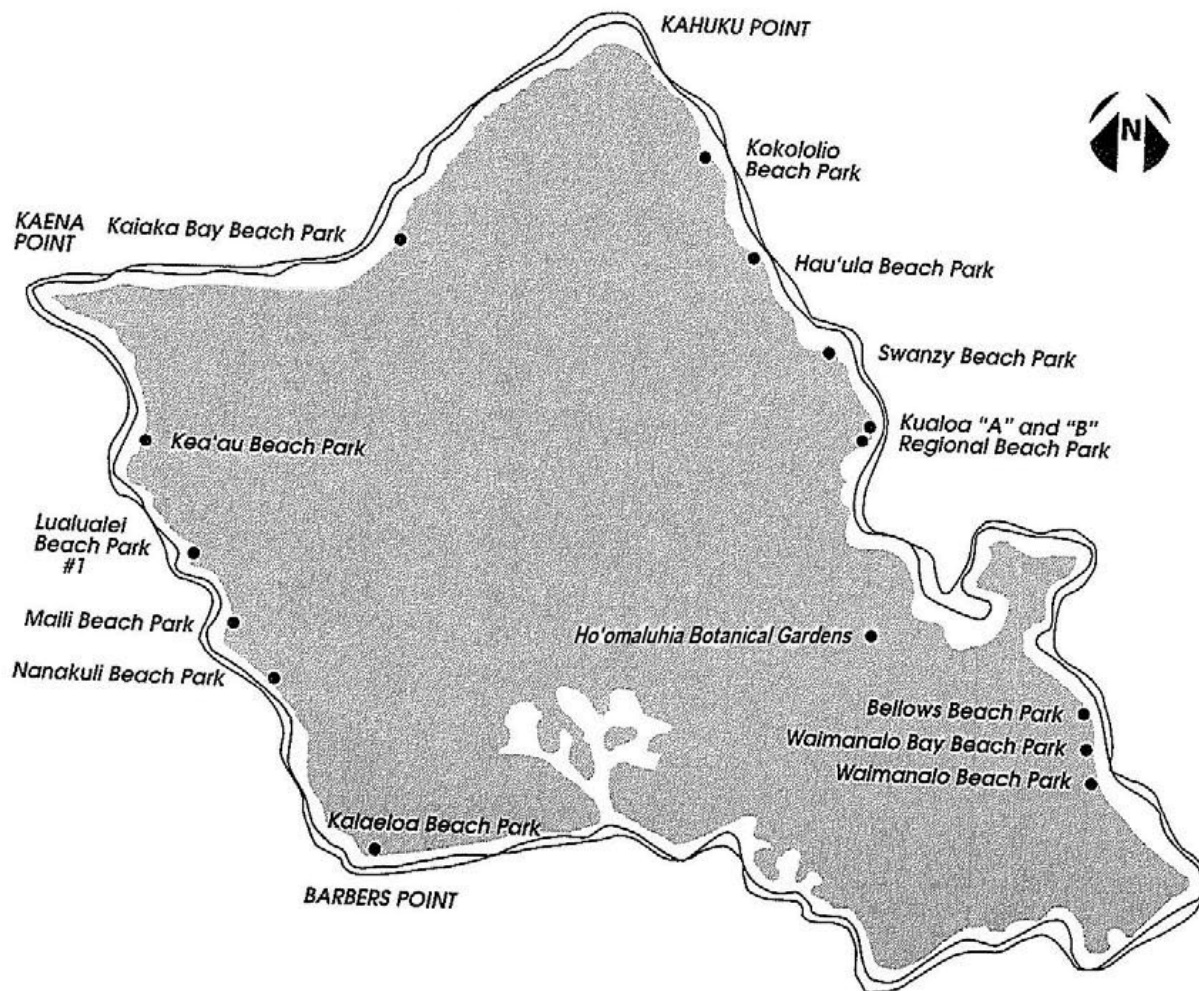
	<i>Location</i>	<i>No. of Campsites</i>	<i>No. of Camp Days Allowed</i>
1	Bellows Field Beach Park	50	3
2	Hau'ula Beach Park	8	5
3	Kaiaka Bay Beach Park	7	5
4	Kea'au Beach Park	25	5
5	Kokololio Beach Park	5	5
6	Kalaeloa Beach Park	13	3
7A	Kualoa "A" Regional Park*	7	3
7B	Kualoa "B" Regional Park	14	5
8	Lualualei Beach Park #1**	6	5
9	Maili Beach Park	12	3
10	Nanakuli Beach Park	11	5
11	Swanzy Beach Park	9	5
12	Waimanalo Bay Beach Park	10	5
13	Waimanalo Beach Park	19	5
14	Ho'omaluhia Botanical Gardens	29	3

*Public camping allowed from Labor Day to Memorial Day

**Camping allowed from Memorial Day through Labor Day only

Source: Department of Parks and Recreation

Exhibit 1.2
Map of O'ahu: 15 Designated City Campgrounds



Source: Department of Parks and Recreation

There are three types of camping activities: recreational, group, and individual (family) camping.

- *Recreational* camping occurs only at Kualoa "A" Regional Park when the park closes its campsites to the public and opens campsites for summer program recreation.
- *Group* camping is authorized at three city parks (Kualoa, Ho'omaluhia, and Maili) and are for groups of more than 10 people. Kualoa and Maili have deposit charges.

- *Individual*, or family camping, which is offered at all 14 city parks and includes 225 campsites which are currently available to the public free of charge. This category allows two family sized tents and up to 10 campers per site.

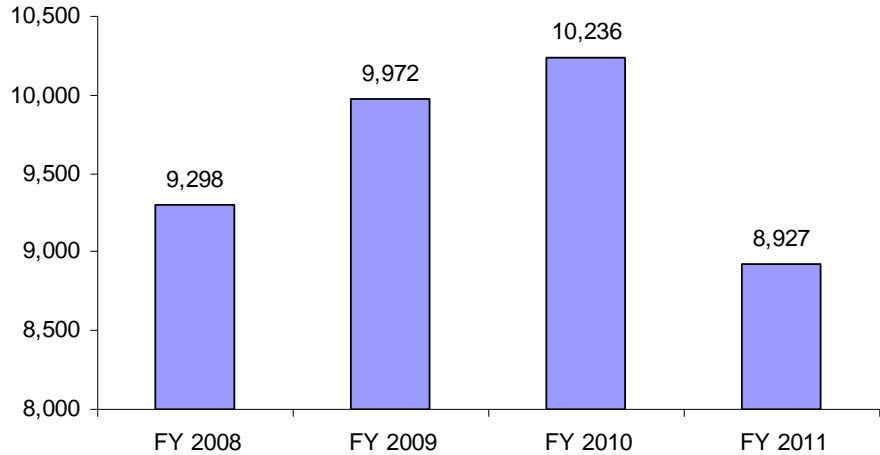
Camping permits are required for the parks, and existing camping times vary.

- Ten campgrounds offer 5-day camping permits (from 8:00 a.m. Friday to 8:00 a.m. Wednesday).
- Five campgrounds¹ feature 3-days of camping (from 8:00 a.m. Friday to 8:00 a.m. Monday).
- The city does not allow camping on Wednesdays and Thursdays.
- Lualualei Beach Park offers camping from Memorial Day through Labor Day.
- Kualoa “A” Regional Park is open to the public, except for the summer when group camping is offered exclusively through its summer recreation program.

The Department of Parks and Recreation issued 9,298 camping permits in FY 2008. This amount excludes the permits issued by Ho’omaluhia Botanical Gardens which did not have a system to track the number of permits issued in FY 2008. In FY 2011, the department issued 8,927 permits, a decrease of nearly 4 percent over four years. Exhibit 1.3 shows the number of camping permits issued between FY 2008 and FY 2011.

¹ For Bellows and Swanzy Beach Parks, on regular weekends, permit is from 12 noon Friday through 8:00 a.m. Monday. If Monday is a holiday, the permit is valid from 12 noon Friday to 8:00 a.m. Tuesday.

Exhibit 1.3
Number of Camping Permits Issued (FY 2008 to FY 2011)



Source: Office of the City Auditor

Camping permits are required

In order to camp at a designated campsite, the city requires a camping permit. Generally, camping permits are issued on a Friday two weeks prior to the camp date.

- Prior to May 2010, camping permits were issued at 12 locations, including the 10 Satellite City Halls, the department's Parks Permit Office in the Fasi Municipal Building, and Ho'omaluhia Botanical Gardens.
- After May 2010, camping permit distribution sites were reduced to four locations, including the department's Parks Permit Office, Wahiawa Satellite City Hall, Kapolei Satellite City Hall, and the Ho'omaluhia Botanical Gardens.
- In January 2012, Wahiawa Satellite City Hall discontinued camping permit issuance.
- Prior to March 2012, Ho'omaluhia issued camping permits up to one year prior to the camp date. Ho'omaluhia issued permits only for Ho'omaluhia.
- Camping permits were issued to the public from 8:00 a.m. to 4:00 p.m.

On March 9, 2012, the city launched its online camping permit system and discontinued camping permit distribution at Kapolei Satellite City Hall and Ho'omaluhia Botanical Gardens. Currently, the only location where the public may apply in person for camping permits is at the department's Parks Permit Office in the Fasi Municipal Building. The permits are available the next business day after the Friday release of the permits.

Camping permit fees

On June 21, 2011, the city enacted Ordinance 11-20 which established camping permit fees. The fee schedule is as follows:

- \$5.00 per day for campsites holding up to 5 people
- \$10.00 per day for campsites holding up to 10 people
- \$75.00 per day for campsites holding up to 60 people
- \$125.00 per day for campsites holding up to 100 people
- \$312.50 per day for campsites holding up to 250 people

The ordinance also authorized an additional \$2 administrative fee, per permit, to cover administrative costs. All camping permit and administrative fees are to be deposited in the general fund, camping revenue account. The fees are supposed to be used to improve and maintain city campsites.

As of August 2012, the city had not started charging camping permit fees.

Department of Parks and Recreation roles

The Department of Parks and Recreation administers the city camping operations². *Camping* is not a formal city program. Camping does not have a separate budget, nor does the department track expenditures allocated specifically to camping.

² The department also manages, maintains, and operates all city parks and recreation; develops and implements programs for cultural and recreational activities; and beautifies public streets. The department's mission is to enhance the leisure lifestyle and quality of life for the people of O'ahu through active and passive recreational opportunities. Its goals and objectives are: (1) To provide parks and recreational opportunities that are accessible, enjoyable, meaningful, safe, well-designed and well-maintained, and (2) To promote and deliver parks and recreation services in an efficient, effective and responsive manner.

Camping operations and its related services are provided by three functions: Administration, Ground Maintenance, and Maintenance Support Services.

- **Administration.** Administration provides administrative, management support, and personnel services related to overall park operations and systems including: budget and purchasing operations, planning, park use permits, and storeroom and property inventory control.
- **Grounds Maintenance.** Grounds Maintenance provides grounds keeping, custodial and maintenance services to all parks and recreation facilities on the island of O’ahu.
- **Maintenance Support Services.** Maintenance Support Services is responsible for providing minor repair and/or replacement services to park buildings, ground facilities and equipment island-wide.

See Appendix 1 for the divisions’ operational data for FY 2008 to FY 2011.

Exhibit 1.4
Photo of Kaiaka Bay Beach Park



Kaiaka Beach Park in Waialua is one of 14 city parks to offer camping. Kaiaka, which offers camping five days a week, is also open daily to general park users.

Source: Office of the City Auditor photo

Audit Objectives, Scope, and Methodology

Per City Council Resolution 11-46, the audit objective was to conduct a performance audit of the Department of Parks and Recreation's camping operations. Specifically, the city council requested information regarding the cost of operations, the condition of the campsite facilities, user demand of the facilities, and the management of the city's camping program.

The audit sub-objectives were to assess the department's management of the camping operations, including the camping permit application and distribution system, enforcement of camping rules, camp maintenance, and associated costs and revenues. We reviewed the recently implemented online camping permit system to evaluate the city's compliance with e-commerce requirements and best practices. We further compared the city's camping operations with other jurisdictions.

For the audit, we focused on the individual and family campsites. As part of our audit work, we inspected all 14 parks that offer camping; inspected restrooms, common areas and parking lots; and surveyed campers applying for city camping permits. We interviewed Department of Parks and Recreation administrators and staff; Honolulu Police Department officers from the Leeward, Windward, and North Shore districts; and engineers from the Department of Design and Construction. We interviewed staff from the Department of Budget and Fiscal Services; staff from the Department of Information Technology; and personnel from the vendor of the city's online camping permit system and data management provider.

We observed and assessed the parks and recreation department's cash management practices and controls; and reviewed best practices from the Commission for Accreditation of Parks and Recreation Agencies. Through our fieldwork, we also analyzed applicable documents related to camping operations expenses, revenues, vendor contracts, security logs, and complaints lodged with the city's Department of Customer Services and Honolulu Police Department.

Our review covered camping operations data and performance from FY 2008 through FY 2011. The audit was performed in accordance with generally accepted government audit standards from August 2011 to November 2011 and March 2012 to September 2012. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained

provides a reasonable basis for our findings and conclusions based on our audit objectives.

Audit Results

The Honolulu City Council, with the mayor's approval, enacted Ordinance 11-20 to establish a fee structure for the city's camping program and a basis for improving and maintaining city campsites. We found, however, that camping program improvements intended by ordinance are not likely to be achieved.

More specifically, the parks and recreation department has not yet begun to collect camping permit fees because it implemented an online camping permit system without fee collection capability and opted to amend its camping rules before fee implementation. As a result, the city has foregone over \$366,000 in estimated annual revenue. Because camping fees will be deposited into the general fund, rather than a special revenue account or other special fund, the parks and recreation department has no plan for how it intends to make improvements to the camping program. Furthermore, administrative and convenience fees may be excessive and need to be justified before they are charged to the public. The ordinance's fee structure and the department's interpretation of those fees are contrary and need to be reconciled. The department's estimates for camping program costs, revenues, and assumptions are inaccurate.

Security and camping facility improvements are top priorities for the camping program. Failure to improve security could result in increased complaints, jeopardize the physical security of campers, and expose the city to potential lawsuits. Failure to replace and improve camping facilities could exacerbate beach erosion; allow further deterioration of the wastewater and sanitation systems; and expose the city to environmental violations and lawsuits. In addition, potential loss of campsites would result in lost revenues from camping permit fees.

The parks and recreation department could make various administrative and managerial improvements, too. The department has implemented an online camping permit program and hired a camping specialist to focus on the camping program. However, more could be done. The department should establish a formal camping program and a camping manual to standardize camping operations. The department should also implement a web-based quality assurance program to improve program quality and ensure its online camping permit system and third

party vendors comply with e-commerce requirements. Failure to address these issues could adversely affect citizen perceptions of the camping program and expose the city to financial losses.

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Chapter 2

Camping Improvements Intended by Ordinance 11-20 Are Not Likely to Be Achieved

Ordinance 11-20 states the camping fees shall be used to *improve and maintain* city campsites and will be placed in a *camping revenue account* within the general fund. We found that the Departments of Parks and Recreation and Budget and Fiscal Services are not following the ordinance's requirements or intent. As a result, the city's camping program is not likely to see improvements as the city council intended. Specifically, we found that:

- As of August 2012, the Department of Parks and Recreation has not yet begun to collect camping permit fees as directed by ordinance. The department explained that it needs to amend its camping rules before it can begin collecting fees. As a result, the city has forgone an estimated \$366,000 in annual revenue and improvements to the camping program that those revenues could have supported.
- The Department of Budget and Fiscal Services does not intend to create a *camping revenue account* within the city's general fund as required by ordinance. According to budget and fiscal services department administrators, the camping program is supported by the general fund and the camping permit fee revenues are viewed as an offset to general fund appropriations. Thus, camping permit and administrative fees will be deposited into the general fund. As a result, the parks and recreation department will not directly receive any of the camping permit fees and campers are unlikely to see significant improvements to campgrounds and facilities.
- The Department of Parks and Recreation does not have a plan for how camping permit fee revenues, authorized by ordinance, will be spent or what types of improvements will be made. The department lacks a plan because it does not expect to directly receive camping permit fee revenues. As a result, campers are unlikely to see

significant improvements to city campgrounds, despite the newly implemented fees.

- Ordinance 11-20 authorized the parks and recreation department to assess a \$2 administrative fee to cover administrative costs to issue the camping permit. We found that the Department of Budget and Fiscal Services intends to charge an additional *convenience fee*, of up to \$5, to cover costs related to credit card transactions. As a result, we question whether the \$2 administrative fee authorized by ordinance is necessary.
- Ordinance 11-20 established a fee structure for city-issued camping permits. We found that the Department of Parks and Recreation's plan to implement the fee structure is contrary to the ordinance. The discrepancy could have legal ramifications. We believe the department's plan streamlines the camping permit fee structure and maximizes revenues to the city. The department should work with the city council to amend the ordinance and conform to the department's fee implementation plans.

In addition to the discrepancies we found between Ordinance 11-20's intent and the administration's plans, we assessed the administration's estimated expenses, revenues, and assumptions related to the camping program. We found the figures were inaccurate and based on incorrect assumptions.

Potential Revenues Exceeding \$366,000 Were Not Collected

On June 21, 2011, the city enacted Ordinance 11-20 which established camping permit fees ranging from \$5 per day to \$312.50 per day. The ordinance also authorized an additional \$2 administrative fee, per permit, to cover administrative costs. As of August 2012, the department had not yet begun to collect camping permit fees. By not initiating the collection of camping permit fees as authorized by the city council, the department has forgone over \$366,000 in revenue to the city as of July 2012³.

³ Ordinance 11-20 established camping fees on June 21, 2011. Forgone revenue based on OCA's annual revenue projection from July 2011 to July 2012.

Reasons for Department Delays in Collecting Camping Fees

The department did not charge camping permit fees for two primary reasons.

1. According to a department administrator, camping permit fees were not collected because the department needed to amend its camping rules to incorporate the fee structure established by Ordinance 11-20. As of September 2012, the department had not yet scheduled public hearings on the revised camping rules.
2. We also found that camping permit fees were not collected because the department had been working on an online camping permit system prior to the ordinance's adoption. The online permitting system was developed in response to complaints from the various businesses and landlords regarding the long lines created by people waiting to apply for camping permits, sometimes overnight. The online system was a priority for the administration and was rolled-out in March 2012, even though the system did not have the capability to collect fees.

Exhibit 2.1

Photo of Campers Lining Up at Fasi Municipal Building to Obtain Camping Permits



Prior to implementing the online camping permit application system in March 2012, campers would line up, sometimes overnight, to reserve a campsite. Campers are seen here lining up at the Fasi Municipal Building.

Source: Office of the City Auditor photo

We held preliminary discussions with the Departments of Budget and Fiscal Services and Parks and Recreation about the delay in camping permit fee collection. A budget and fiscal services administrator, speaking on behalf of the parks and recreation department, disagreed with our assessment related to the delay in the camping fee collection. The administrator explained that there's a process that the budget and fiscal services department follows when starting a new initiative such as camping permits. First, an ordinance must be passed to authorize a program. Second, applicable rules and regulations need to be amended, through the rule-making process, to effectuate the ordinance. Third, the department must develop specifications for implementing the program; in this case, the new camping permit fees. Therefore, the camping permit system is being implemented according to established processes.

While we acknowledge the budget and fiscal services department's process and the administrator's position, we contend that amending the camping rules, in this instance, was a choice for the department, and not a requirement. First, if the ordinance merely authorized the department to charge unspecified camping permit fees then, yes, we agree that the parks and recreation department should amend its rules and hold public hearings to establish an appropriate fee. However, Ordinance 11-20 specified the fee amounts to be charged. We therefore believe that it was unnecessary to delay the fee collection in order to amend the camping rules.

Second, we note that if the department followed its process, implementation of the online camping permit system should have been delayed in order to amend the camping rules, since it significantly changed the way campers could obtain permits. However, the online system was implemented without rule changes and public input.

Camping Permit Fees Will Be Deposited into the General Fund Rather Than a Special Revenue Account

Ordinance 11-20 required the establishment of a *special revenue account* in the general fund to receive camping permit fee revenues. In Mayor's Message 96 (2011), the mayor explained that creation of special revenue accounts are an executive function allocated to the Department of Budget and Fiscal Services, and not the city council. The mayor allowed Bill 60 to become law (Ordinance 11-20) without his signature, notwithstanding the creation of the special revenue account.

Administrators from the Department of Budget and Fiscal Services confirmed that the department does not intend to create a special revenue account within the general fund or any other type of special fund. Rather, camping permit fees will be deposited into the general fund. A budget and fiscal services administrator advised us that depositing camping permit fee revenues in the general fund is appropriate because the parks and recreation department will be able to realize benefits as it goes through the regular budgeting process. That is, the camping permit fee revenues are contained in the general fund, and because the camping program is supported through the general fund, the department will benefit. The budget and fiscal services department's position is that camping permit fee revenues should offset general fund appropriations that support the camping program, and should not go directly to the department to maintain and improve the camping program.

Creation of a special fund would provide the most assurance that camping fee revenues will be used exclusively for the camping program. However, only the administration has the authority to create a special fund. Absent the special fund, and in keeping with the ordinance's intent that camping permit fee revenues be used to benefit the camping program, we recommend that the department issue an annual report detailing the amount of camping permit fees collected and how those revenues were used to benefit the city's camping program.

The Department of Parks and Recreation Does Not Have a Formal Plan to Improve the Camping Program

Ordinance 11-20 requires the camping permit fees to be used to improve and maintain the city's camping operations. Department of Parks and Recreation personnel stated they did not have any set plans for the camping permit fee revenues. The department made suggestions for preferred uses of the revenues such as increasing security or hiring staff to enforce rules throughout the campsites. However, no formal, specific plans exist for using the new camping permit fee revenues because the department does not expect to directly receive any camping permit fee revenues to improve the camping program. As a result, if camping permit fees were collected, it is unlikely that the public would see any improvements from the newly established fees.

Ancillary Fees Should Be Justified Before Charging Campers

The Department of Parks and Recreation plans to charge a flat \$30 fee for 3-day camping permits and \$50 for 5-day camping permits. In addition to the camping permit fees, there are two additional fees that will be imposed on campers:

1. **Administrative Fee.** Ordinance 11-20 authorized the Department of Parks and Recreation to levy a \$2 administrative fee for each camping permit issued. The fee would cover the department's cost to issue the permit.
2. **Convenience Fee.** City Administrative Rules, Title 03, Chapter 72, *Electronic Transaction Convenience Fee*, authorizes the Department of Budget and Fiscal Services to assess a convenience fee, not to exceed \$5, for each electronic transaction. The fee would cover the city's cost to administer credit card transactions.

We found that the amount of the convenience fee should be justified before it is charged to campers. Since the budget and fiscal services department intends to assess the convenience fee, we suggest that the Department of Parks and Recreation also justify the need for the \$2 administrative fee authorized by ordinance. Otherwise, the administrative fee may be excessive or unnecessary.

Proposed convenience fee should be justified before charged to campers

According to a Department of Budget and Fiscal Services administrator, the convenience fee is needed to defray the city's costs of providing the *convenience* that allows campers to purchase camping permits online using a credit card, and is separate from the \$2 administrative fee authorized by ordinance. Campers that purchase camping permits with cash at the city's permitting office would not pay the convenience fee.

As of August 2012, the Department of Parks and Recreation's camping website featured a *Frequently Asked Questions* section that advised campers of the impending convenience fee. The website noted that when the city begins charging for camping permits, it would also begin assessing \$7 in fees (\$2 administrative fee and \$5 convenience fee.) The \$5 convenience fee would increase the total fees charged to \$7 per permit. Thus, the combined administrative and convenience fee would increase a 3-day, \$30 camping permit fee to \$37. The combined fees represent 23 percent of the total cost for the 3-day permit.

We compared the proposed \$5 convenience fee against the costs incurred by the city and concluded the fees would be excessive. For example, the city’s current credit card processing cost is 2.1 percent of the value of the electronic transaction. The city’s credit card processing cost on a 3-day camping permit would be \$0.63 (\$30 permit x 2.1%). The city’s credit card processing cost on a 5-day camping permit would be \$1.05 (\$50 permit x 2.1%). In addition, we estimate that the *cloud*⁴ system management costs related to maintaining the city’s online camping permit system is \$8,400 annually. The city’s cost would be significantly less than the revenues generated by the \$5 convenience fee.

As Exhibit 2.2 shows, the \$44,854 in revenues derived from the \$5 convenience fee exceeds the estimated credit card and *cloud* management expenses of \$15,742. Based on current estimates, the appropriate convenience fee is approximately \$1.75.

**Exhibit 2.2
Projected Convenience Fee Revenues Versus Projected Costs⁵**

	\$1 Convenience Fee	\$1.75* Convenience Fee	\$3 Convenience Fee	\$5 Convenience Fee
Projected Revenue	\$8,971	\$15,742	\$26,912	\$44,854
Projected Expense	\$15,742	\$15,742	\$15,742	\$15,742
Difference	-\$6,771	\$0	\$11,170	\$29,112

* \$1.75486 rounded

Source: Office of the City Auditor analysis

We held discussions with the Departments of Budget and Fiscal Services and Parks and Recreation about the administrative and convenience fees. The budget and fiscal services department

⁴ The *cloud* is the use of computing resources (hardware and software) to deliver services over the internet. The services include storing data, software application, computations, payment collections, electronic funds transfer, and other e-commerce activities.

⁵ Calculations assume a 78.2% occupancy rate for camping sites.

administrator we spoke with clarified that the administrative rule authorizes a convenience fee of up to \$5 and that the fee would have to be justified before it was implemented. The administrator noted that the parks and recreation department was premature in advising campers that the fee would be set at the maximum of \$5. The parks and recreation department website has since been corrected to advise campers that they may be charged *up to* \$7 in fees. The parks and recreation department administrator advised us that the department does not intend to collect the convenience fee for the first year. It plans to obtain accurate operational data, and determine the appropriate convenience fee based on the data. We agree that the convenience fee amount should be justified before it is assessed on camping permits.

The \$2 administrative fee authorized by ordinance may be unnecessary

Ordinance 11-20 authorizes the Department of Parks and Recreation to assess a \$2 administrative fee to pay for the administrative costs associated with the issuance of the camping permit. Since the Department of Budget and Fiscal Services intends to exercise its administrative prerogative and assess a convenience fee of up to \$5 as allowed under its administrative rules, we question the need for the \$2 administrative fee. Beyond the costs covered by the proposed convenience fee, we were unable to identify any additional costs that the parks and recreation department will incur to operate the camping permit system. Unless the parks and recreation department can justify the administrative costs it will incur to issue online permits, beyond those costs covered by the convenience fee, we recommend that the city council rescind or amend the administrative fee assessment in Ordinance 11-20.

The Ordinance's Fee Structure and the Department's Interpretation Need Conformance

The department's proposed camping permit fee assessment is inconsistent with the ordinance. The parks and recreation department has campsites that feature either 3-day or 5-day permits. According to Ordinance 11-20, the camping fee is set at *\$10 per day for campsites holding up to 10 people*. However, the department does not intend to charge fees on a per-day basis. The department's intent is to charge a flat fee of \$30 for the 3-day camp site and \$50 for the 5-day campsite regardless of whether the camper stays for the full period. For example, a camper who wants to camp for three nights at a 5-day campsite would have to pay \$50 even though the camper's stay is only three days. Similarly, a camper would have to pay \$30 for a 3-day campsite, even though the camper may plan to stay only overnight. We

believe the department's fee structure better serves the city's interests because it maximizes revenues and streamlines the fee assessment. The discrepancy between the ordinance's per-day fee structure versus the department's intent to charge a flat fee should be reconciled. We therefore suggest that the department work with the city council to amend the ordinance's fee structure.

Operating Expenses, Revenues and Assumptions Are Inaccurate

In FY 2011, the Department of Parks and Receptions requested that the city council establish fees for camping to assist in the operating and maintenance of the city's recreational camping facilities. The department estimated operating costs at over \$1.3 million and projected revenues of almost \$354,000. These costs and revenues estimates were used to establish the camping permit fees.

We analyzed the department's camping expenditures and recalculated the revenue projections based on the fee structure listed in Ordinance 11-20. We found the projections were based on assumptions and data that overstated operating costs by \$244,538 and understated revenues by over \$13,000. As a result, the permit fees and justification for the program were based on inaccurate data.

Camping Cost Projections Are Overstated

The camping operation cost projection calculated during the initial planning phase of the online permitting system estimated camping program costs to be \$1,308,267 (as of August 2012). Our cost estimate for management, enforcement, and maintenance operations was \$1,063,729 or \$244,538 less than the department estimate. Our cost calculations are shown in Exhibit 2.3.

Exhibit 2.3**Department of Parks and Recreation Cost Projections Versus Audit Projections**

	Department of Parks and Recreation Projections	Auditor Projections	Difference
Management & Enforcement			
Park caretakers: maintenance and first level enforcement	\$573,431	\$573,431	-
Part-time, roving enforcement staff (Thursday thru Saturday)	\$114,686	\$0	Overstated \$114,686
3rd party security guards for Kualoa	\$50,000	\$56,108	Understated \$6,108
3rd party security guards for Bellows	\$100,000	\$21,665	Overstated \$78,335
3rd party security guards for Ho'omaluhia	\$45,760	\$69,814	Understated \$24,054
Online system administrator	\$73,528	\$0	Overstated \$73,528
Maintenance			
Comfort Stations ⁶	\$245,169	\$238,076	Overstated \$7,093
Permit Processing			
Labor to reserve sites	\$79,650	\$79,650	-
Labor to issue permit, or change & reissue permit	\$7,965	\$7,965	-
Supplies-paper	\$153	\$153	-
Supplies-ink	\$45	\$45	-
Equipment-computer	\$1,080	\$1,080	-
Credit Card transaction processing fee, software, and internet "cloud" services	\$16,800	\$15,742	Overstated \$1,058
Total Projected Costs	\$1,308,267	\$1,063,729	Overstated \$244,538

Source: City Auditor calculations based on Department of Parks and Recreation data

⁶ Ho'omaluhia Botanical Garden not included.

The administration’s camping operation cost projection was inaccurate for several reasons:

- The department data was not updated;
- The department did not properly allocate or prorate the salaries of park caretakers between *camping* management and *regular* park management;
- The department did not separately allocate the cost of supplies for the comfort stations between the *camping* and *regular park* operations;
- Security guard costs for Bellows, Kualoa, and Ho’omaluhia were overstated by over \$48,000; and
- Two part-time roving enforcement staff and an online system administrator costs totaling over \$188,000 were included in the administration’s costs although the positions were not authorized or filled

Camping Revenue Projections Are Understated

The department's revenue projections were \$353,385. Our revenue projection was \$366,451 or \$13,066 more than the department’s projections. Our revenue calculations are shown below:

**Exhibit 2.4
Department Versus Auditor Revenue Projections**

	<i>Parks and Recreation Dept. Projections</i>	<i>Auditor Projections</i>	<i>Difference</i>
Revenue Projection			
Single Campsites Revenue	\$264,960	\$348,662	Understated \$83,702
Group Campsites Revenue	\$88,425	\$0	Overstated \$88,425
Administrative Fee (\$2)	\$0	\$17,789	Understated \$17,789
Total Projected Revenues	\$353,385	\$366,451	Understated \$13,066

Source: City Auditor calculations based on Department of Parks and Recreation data

The department's campsite revenues were based on projections developed for an earlier version of the bill and used a different methodology for calculating the revenues. Under the first version of the bill, the department calculated the price per camping period at \$37.50 for single campsites and up to \$937.80 for group campsites. The projected revenues were based on an 80 percent expected use rate for single campsites and 50 percent for group campsites. The FY 2011 revenues projected by the department were \$264,960 for single campsites and \$88,425 for group campsites, for a total of \$353,385.

We recalculated the revenue projections based on the fee structure listed in Ordinance 11-20, the department's interpretation of collection fees based on the fee structure, and a 78.2 percent occupancy rate⁷. These charges were \$30 for a 3-day permit and \$50 for a 5-day permit for campsites holding up to 10 people, regardless of the actual number of people camping. Our projected revenues were \$348,662 for single campsites, \$0 for group campsites, and \$17,789 in administrative fees for a total of \$366,451 in revenues.

Our projection excludes group campsite revenues because group campsites were not available for online permitting and were handled separately at the permit office level. Furthermore, the department could not provide accurate data for the number of group permits issued or the total revenues collected from FY 2008 to FY 2011. As a result, we could not develop any meaningful estimates.

⁷ Based on FY 2011 permits issued.

Exhibit 2.5 Estimated Expense and Revenue Projections

	<i>Department of Parks and Recreation Projections</i>	<i>Auditor Projections</i>	<i>Difference (+/-)</i>
Expense			
Management & Enforcement	\$957,405	\$721,018	\$236,387
Maintenance	\$245,169	\$238,076	\$7,093
Permit Processing	\$105,693	\$104,635	\$1,058
Grand Total-Costs	\$1,308,267	\$1,063,729	\$244,538
Revenue Projection			
Single Campsites Revenue	\$264,960	\$348,662	\$83,702
Group Campsites Revenue	\$88,425	\$0	\$88,425
Administrative Fee (\$2)	\$0	\$17,789	\$17,789
Grand Total-Revenues	\$353,385	\$366,451	\$13,066

Source: City Auditor calculations based on Department of Parks and Recreation data

Recommendations

The Department of Parks and Recreation should:

- Expedite amendment of the camping rules so that it can begin collecting camping permit fees.
- Establish procedures that recognize the camping permit fee revenues and ensure revenues are used to benefit the camping program if the budget and fiscal services department does not establish a special fund for the collection of camping permit fee revenues. The procedures should include an annual report to the city council that details the amount of revenues collected and how camping permit fee revenues were used.
- Develop a formal plan for how it intends to use camping permit fee revenues to maintain and improve the camping program.
- Justify the convenience fee amount before it is charged to campers.

- Work with the city council to amend the Ordinance 11-20's fee structure so that it conforms to the department's fee implementation plans.

The Department of Budget and Fiscal Services should:

- Establish a special fund for the collection of camping permit fee revenues to ensure that the camping program directly benefits from the fees collected.

The City Council should:

- Consider amending Ordinance 11-20 to rescind or amend the \$2 administrative fee authorized to cover camping permits administrative costs if the Department of Parks and Recreation can not justify the fee.

Chapter 3

Department of Parks and Recreation Needs to Improve Security and Camping Facilities

We believe that once the city begins collecting fees for camping permits at city parks, campers will expect improvements to city parks. As noted in the previous chapter, the Department of Parks and Recreation does not have a formal plan for improving campsites as intended by Ordinance 11-20. We conducted a survey of campers and 34 percent of respondents stated security was a top priority. Also, the Honolulu Police Department (HPD) responded to over 5,000 calls in city parks during camp hours between FY 2008 through FY 2011. The calls ranged from noise and nuisance complaints to sex assault and weapons violations. Although *enhanced* security⁸ was effective, the department provided *enhanced* security at only 4 of 14 city parks with camping. As a result, other parks relied on the police department or alternative forms of security to protect campers. Using the camping fee revenues to augment the department security funds could increase the use of *enhanced* security for camper safety.

We found many campsite facilities need to be repaired or replaced. The deficiencies included beach erosion that reduced the number of campsites; wastewater systems that could contaminate the environment; and septic tanks in need of repairs or replacement. The system deficiencies and lack of compliance with state and federal wastewater standards at the camping locations placed the city at risk for environmental law violations and fines. Although the city plans to spend \$5.3 million in erosion mitigation and \$4.9 million for wastewater system upgrades at Kualoa Regional Park to comply with environmental standards, more funds may be needed to correct the camping site deficiencies.

Security Is a Top Priority

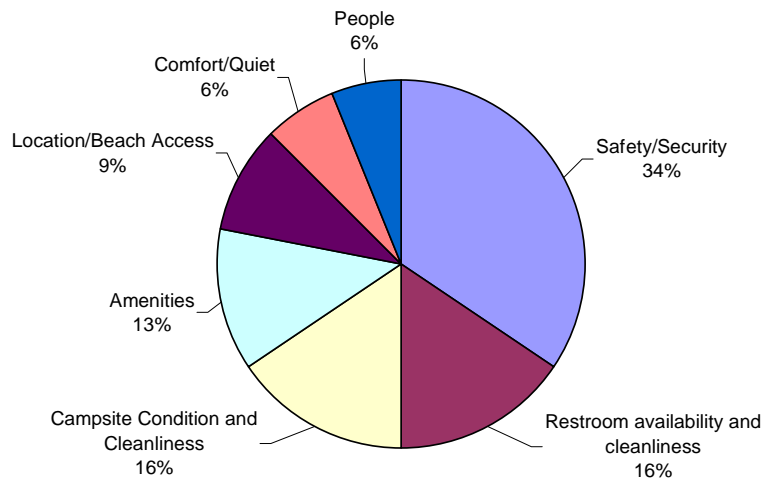
One of the department's goals is to *provide park and recreational opportunities that are accessible, enjoyable, meaningful, safe, well-designed and well-maintained*. In our view, in order for campers to have enjoyable and safe camping experiences, adequate security is

⁸ *Enhanced* security includes privately-contracted security patrols and/or city employees that live on-site.

a priority. We found that security is inconsistent among the various city parks that offer camping.

During the audit, we conducted a survey of 32 campers and 34 percent reported security was the most important consideration when selecting their campsites. Campers were asked, *What is the most important thing for you when choosing a place to camp?* A total of 11 of the 32 respondents (34 percent) rated security as the highest priority when choosing a campsite. Restroom availability and cleanliness was rated high by 5 respondents (16 percent) and another 5 respondents (16 percent) identified campsite condition and cleanliness as a high priority. Exhibit 3.1 shows camper priorities when selecting a place to camp.

Exhibit 3.1
Camper Priorities When Selecting a Campsite



Source: Office of the City Auditor analysis

Although security is a top priority for campers, only 4 of 14 city parks with camping offered *enhanced* levels of security.

Police Calls Are Numerous

Campsite security is needed to ensure that campers follow camping rules and to protect campers from crimes and complaints ranging from noise and nuisance to burglary, assaults, and kidnap. Failure to provide adequate security could result in increased complaints, jeopardize the physical security of campers, and expose the city to potential liability.

Honolulu Police Department officers are the primary agency for park security. Department of Parks and Recreation maintenance staff play only a small role in enforcing city camping rules, and work Monday through Friday. Camping at all city parks usually occurs on weekend days and nights when park staff is not on-site. Campers therefore depend on the Honolulu Police for protection.

During camp days over the last four years (FY 2008 to FY 2011), the Honolulu Police Department responded to 5,652 calls to 14 city parks on days that camping was permitted. The number of police calls to city parks increased 12 percent from FY 2008 (1,305) to FY 2011 (1,457). The tables below detail the number of police calls for each of the 14 parks with camping by fiscal year.

Honolulu Police Department data show:

- Kea`au Beach Park recorded the most calls from FY 2008 to FY 2011, with police responding to 1,692 calls; and
- Waimanalo Beach Park (840) and Maili Beach Park (668) were second and third, respectively.

**Exhibit 3.2
HPD Calls to City Parks With Camping (FY 2008 to FY 2011)**

	<i>City Park with Camping</i>	<i>FY 2008</i>	<i>FY 2009</i>	<i>FY 2010</i>	<i>FY 2011</i>	<i>Total</i>
1	Kea`au Beach Park	392	432	438	430	1,692
2	Waimanalo Beach Park	184	216	194	246	840
3	Maili Beach Park	191	178	152	147	668
4	Hau`ula Beach Park	114	107	132	151	504
5	Nanakuli Beach Park	134	136	96	127	493
6	Kualoa Regional Park	105	127	100	100	432
7	Bellows Beach Park	76	105	127	55	363
8	Kaiaka Bay Beach Park	39	100	73	89	301
9	Kokololio Beach Park	36	53	54	69	212
10	Swanzy Beach Park	32	31	36	42	141
11	Lualualei Beach Park*	1	0	1	0	2
12	Waimanalo Bay Beach Park	0	0	1	1	2
13	Ho`omaluhia Botanical Gardens	1	0	0	0	1
14	Kalaeloa Beach Park	0	0	1	0	1
	Total	1,305	1,485	1,405	1,457	5,652

*Lualualei offers camping from Memorial Day to Labor Day only.

Source: Office of the City Auditor analysis of Department of Parks and Recreation data

In order to compare police call data for both 3-day and 5-day camping, equally, we adjusted the data for number of camping days permitted and the number of campsites at each park. The highest average calls per campground, per day from FY 2008 to FY 2011 were:

- Maili Beach Park which had the highest average number of police calls per campground at 4.64 calls per day. It features three days of camping per week and 12 individual campgrounds;
- Kea'au Beach Park, which offers 5-day camping permits, had an average of 3.38 police calls per campground, per day; and
- Hau'ula Beach Park, which also offers 5-day camping permits, reported an average of 3.15 police calls per campground, per day.

In comparison, Bellows Beach Park, which features three days of camping per week with 50 campsites, averaged only 0.61 police calls per campground, per day.

The top 10 complaints that Honolulu Police responded to at city

Exhibit 3.3

HPD Calls to City Parks Adjusted for Number of Camp Days and Number of Campsites (Four Years Cumulative - FY 2008 to FY 2011)

	City Park with Camping	Average Number of Calls Per Campground/ Day
1	Mailli Beach Park	4.64
2	Kea`au Beach Park	3.38
3	Hau`ula Beach Park	3.15
4	Nanakuli Beach Park	2.24
5	Waimanalo Beach Park	2.21
6	Kaiaka Beach Park	2.15
7	Kokololio Beach Park	2.12
8	Swanzy Beach Park	1.31
9	Kualoa Regional Park ⁹	1.03
10	Bellows Beach Park	0.61
11	Lualualei Beach Park ¹⁰	0.02
12	Waimanalo Bay Beach Park	0.01
13	Kalaeloa Beach Park	0.01
14	Ho`omaluhia Botanical Garden	0.00

Source: Office of the City Auditor analysis of Department of Parks and Recreation data

parks that offer camping involved the following:

- Noise Complaints (1,068 calls) comprised 19 percent of the total calls and were the most common reason for police response;
- Arguments (794 calls) represented 14 percent of the calls; and

⁹ Kualoa Regional Park has 14 campsites that offer 5-day camping and 7 campsites that offer 3-day camping. For purposes of this report, data reflects HPD calls for five days.

¹⁰ Lualualei Beach Park offers camping from Memorial Day to Labor Day only.

- Miscellaneous Service Calls (598 calls) totaled 11 percent of the calls.

Exhibit 3.4 shows the top 10 complaint categories reported.

Exhibit 3.4
Top 10 HPD Calls by Category (FY 2008 to FY 2011)

No.	Complaint	Total	Percent of Total Calls
1	Noise Complaint	1068	19%
2	Argument	794	14%
3	Miscellaneous Service Call ¹¹	598	11%
4	Nuisance Complaint ¹²	581	10%
5	Miscellaneous Public ¹³	225	4%
6	Parking Violation	211	4%
7	Suspicious Circumstances ¹⁴	194	3%
8	Hazardous Driver	176	3%
9	Traffic Stop	150	3%
10	Unauthorized Entry to a Motor Vehicle ¹⁵	127	2%

Source: Office of the City Auditor analysis of Honolulu Police Department data

Police also responded to more serious and disturbing activities during the same time period including aggravated assault (20 calls), weapons (11 calls), and drugs/narcotics (6 calls). Other serious calls included rape (3 calls), sex assault (3 calls), and kidnap (1 call). Additional calls included simple assault (61 calls) and indecent exposure (3 calls). See Appendix 2 for a complete list of HPD calls.

¹¹ *Miscellaneous Service Call* is a non-written case where an officer responds and provides information or service to the caller, mostly non-criminal in nature.

¹² *Nuisance Complaint* includes loud noise, loud music, loud talking, or peddling; usually no report is written.

¹³ *Miscellaneous Public* is a written case to document an incident that is not criminal in nature, generally for records purposes only.

¹⁴ *Suspicious Circumstances* is a classification used when something unusual is reported, but the responding officer could not locate anything to determine if a crime occurred. May be written or non-written.

¹⁵ *Unauthorized Entry to a Motor Vehicle (UEMV)* includes theft from a vehicle, car break-in, or criminal conduct from a person outside a vehicle or in the vehicle.

Security Is Inconsistent

Although police department data show that parks with *enhanced* security (which includes privately-contracted security patrols and/or city employees that live on-site) have fewer incidents, *enhanced* security was not available at all the park campsites. In our opinion, camping permit fee revenues could be used to expand the *enhanced* security services to all campsites.

The Department of Parks and Recreation provided different types of security at each park. The different levels of campsite security included:

- Contracted private security firms at three city parks: Bellows Beach Park, Ho'omaluhia Botanical Garden, and Kualoa Regional Park;
- City employees living in on-site city housing at three city parks: Ho'omaluhia Botanical Garden, Kualoa Regional Park, and Waimanalo Bay Beach Park; and
- Both private security and a live-in city employee at Ho'omaluhia Botanical Gardens and Kualoa Regional Park.

In addition to the added security at these parks, the Honolulu Police Department operates a Parks Detail unit dedicated exclusively to patrolling beach parks along the Leeward Coast, including those that offer camping. Some parks do not have any added security services.

Private security patrols are effective, but costly

In FY 2011, the department spent \$147,587 to provide enhanced security patrols for three parks. The private security occurred during times when camping was permitted. The cost and type of private security provided at these parks are shown in Exhibit 3.5.

Exhibit 3.5

Private Security at City Parks That Offer Camping (Annual Cost)

	City Beach Park	Annual Cost ¹⁶	Service Provided
1	Bellows Beach Park	\$21,665	One security guard nightly from 7:00 p.m. to 7:00 a.m. Friday through Monday (Tuesday if Monday is a holiday). The guard is posted at the main gate and restricts non-military access to the park after 8:00 p.m.
2	Ho`omaluhia Botanical Garden	\$69,814	One security guard Monday through Thursday (3:30 p.m. to 8:00 p.m.); Friday (3:30 p.m. to 7:00 a.m.); Saturday and Sunday (9:30 a.m. to 7:00 a.m.). Guard patrols grounds, opens/closes gates; and provides information.
3	Kualoa Regional Park	\$56,108	One security guard Monday and Tuesday (3:30 p.m. to 9:30 p.m.); Friday (3:30 p.m. to 12:00 midnight); Saturday (7:00 a.m. to 12:00 midnight); Sunday (7:00 a.m. to 9:30 p.m.). Security guard patrols the grounds at Kualoa Regional Park and has knowledge of campground rules and regulations.
Total Annual Cost		\$147,587	

Source: Office of the City Auditor analysis

Exhibit 3.6

Photo of *Enhanced Security Private Patrol Car*



This Star Security Patrol car provides roving patrols at Kualoa Regional Park when campgrounds are occupied. Only 3 of 14 city parks have private security patrols.

Source: Office of the City Auditor photo

¹⁶ Annual cost is based on CY 2011 and CY 2012 data.

City owned perquisite housing is on-site

The department uses perquisite housing contracts where city employees live on-site at some parks. According to the city’s policy, the city may use perquisite housing if it is used to deter vandalism, monitor equipment, provide for emergency services, perform off-hour duties, or provide more accessible public contacts. Perquisite housing may be used to promote an identifiable goal, such as dealing with operational effectiveness, which cannot be attained through other less costly means.

Under perquisite housing guidelines, the city provides certain employees with housing in exchange for added services such as after-hours security for park users and park property, enforcing park rules and regulations, and monitoring camping and facility use permits. Perquisite housing is currently provided at three city parks that offer camping: Ho’omaluhia Botanical Garden, Kualoa Regional Park, and Waimanalo Bay Beach Park¹⁷. The exhibit below provides details on perquisite housing.

**Exhibit 3.7
Perquisite Housing at City Parks With Camping (FY 2011)**

	City Park	Housing Provided	No. of Occupants	Value of Housing Provided (Monthly) ¹⁸	Value of Services Provided (Monthly) ¹⁹	Additional Hours Worked (Per Month)
1	Ho’omaluhia Botanical Garden	Three bedrooms and one bath	3	\$1,435	\$1,420	58
2	Kualoa Regional Park	Three bedrooms and one and one-half baths	6	\$1,435	\$1,295	72
3	Waimanalo Bay Beach Park	Three bedrooms and two baths	7	\$1,835	\$1,360	74
	Total Monthly Cost			\$4,705	\$4,075	
	Total Annual Cost			\$56,460	\$48,900	

Source: Office of the City Auditor analysis of Department of Parks and Recreation data

¹⁷ Currently, perquisite housing tenants at Ho’omaluhia, Kualoa, and Waimanalo Bay hold full-time jobs with the city, in addition to their housing agreement.

¹⁸ Monthly housing value includes appraised market value rent, water, and electricity costs.

¹⁹ The employee takes a payroll deduction in instances where the value of housing exceeds the value of services provided.

Exhibit 3.8
Photo of City-Provided Perquisite Housing



This three-bedroom, two-bath home is provided to a city employee in exchange for enhanced on-site services at Waimanalo Bay Beach Park.

Source: Office of the City Auditor photo

As shown in Exhibit 3.9 Ho'omaluhia Botanical Garden and Kualoa Regional Park have some of the lowest declines in the number of police calls over the last four years. This may be the result of having both private security and/or perquisite housing on-site.

**Honolulu Police
Department uses
dedicated park patrols for
Leeward Coast beach
parks**

Leeward Coast parks with camping do not have private security and/or perquisite housing. However, the Honolulu Police Department operates a dedicated parks patrol team (Parks Detail) to monitor all parks from Ewa to Yokohama Bay. According to a Parks Detail police officer, the city administration created the Parks Detail in 2008 as part of the compensation package provided to Leeward Coast residents for the continued operation of the Waimanalo Gulch landfill.

The Parks Detail includes three officers assigned specifically to monitor parks from Ewa to Yokohama Bay, including Kalaeloa Beach Park, Kea'au Beach Park, Lualualei Beach Park (summer only), Maili Beach Park, and Nanakuli Beach Park, which offer camping.

The patrol shifts overlap, but do not coincide with the Department of Parks and Recreation camping periods. The 3-day camps run Friday through Monday and 5-day camps run Friday through Wednesday. The Parks Detail unit patrols Leeward Coast parks from 6:00 p.m. to 2:45 a.m., Tuesdays through Saturdays (there are no patrols on Sunday and Monday). The three-officer unit will generally patrol each city park under its jurisdiction at least once during its shift. As part of their duties, when patrolling a park with camping, campers must present a camping permit for inspection.

Over the four-year period covering FY 2008 to FY 2011, the police department spent \$683,028 to operate the Parks Detail unit. In FY 2011, the police department spent \$179,784 to maintain the detail. According to a police administrator, future funding for the program is not assured because it must compete with other department and administration priorities. Without dedicated funding, the three officers assigned to the detail could be returned to the general police force.

Community policing teams and other patrols

By contrast, Windward and North Shore parks do not have police units dedicated to beach park patrols. The police department's Community Policing Team patrols Windward parks. The policing team does not have a set schedule for patrolling city parks, but tries to be on-site when campers must break camp. In addition to park patrols, the team also works with the community to solve crimes, educates the public on crime prevention, and manages the Neighborhood Patrol Program. The lone North Shore park that offers camping (Kaiaka Bay Beach Park) does not have a dedicated patrol due to the size of the area. Wahiawa Police Station officers patrol North Shore parks, but do not have a set schedule for patrolling Kaiaka Bay Beach Park and respond primarily to 911 calls.

Enhanced security reduces police calls

Police call data indicate camp sites without private security patrols, perquisite housing, or dedicated police patrols had greater increases in police calls than parks with enhanced security. More

specifically, police calls at camping locations and parks with enhanced security declined as much as 28 percent. In contrast, police calls for locations without enhanced security increased as much as 128 percent. Police officers we interviewed stated the patrols served as deterrents for potential violators. Exhibit 3.9 compares police calls for the parks and camping locations with and without enhanced security.

**Exhibit 3.9
Honolulu Police Department (HPD) Calls to Parks With Varying Security
(FY 2008 to FY 2011)**

No.	Park (With Camping)	FY 2008	FY 2009	FY 2010	FY 2011	Total	Change Over 4 Years (%)	Type of Security
1	Kaiaka Bay Beach Park	39	100	73	89	301	128%	
2	Kokololio Beach Park	36	53	54	69	212	92%	
3	Waimanalo Beach Park	184	216	194	246	840	34%	
4	Hau`ula Beach Park	114	107	132	151	504	32%	
5	Swanzy Beach Park	32	31	36	42	141	31%	
6	Kea`au Beach Park	392	432	438	430	1,692	10%	HPD Parks Detail
7	Ho`omaluhia Botanical Gardens*	1	0	0	0	1	0%	Private Security and Perquisite Housing
8	Kalaeloa Beach Park*	0	0	1	0	1	0%	HPD Parks Detail
9	Lualualei Beach Park*	1	0	1	0	2	0%	HPD Parks Detail
10	Waimanalo Bay Beach Park*	0	0	1	1	2	0%	Perquisite Housing
11	Kualoa Regional Park	105	127	100	100	432	-5%	Private Security and Perquisite Housing
12	Nanakuli Beach Park	134	136	96	127	493	-5%	HPD Parks Detail
13	Maili Beach Park	191	178	152	147	668	-23%	HPD Parks Detail
14	Bellows Beach Park	76	105	127	55	363	-28%	Private Security
	Total	1,305	1,485	1,405	1,457	5,652	12%	

*Auditor's Note: These parks had two or fewer calls over four years; percentage change is negligible and set at 0 percent.

Source: Office of the City Auditor analysis of Department of Parks and Recreation data

Camping Facilities Damaged by Erosion Need Repairs or Replacement

We visited every campsite and inspected the camping facilities. We found beach erosion had damaged city campsites and adversely affected the camping program by reducing the number of camping spots. At Kualoa Regional Park, 16 campsites were lost in 2006 and may not be restored. At Hau'ula Beach Park, 7 campsites were lost and another 8 campsites are threatened due to the effects of erosion. The city plans to spend \$5.3 million to mitigate beach erosion at various city parks, however, this may not be sufficient. The department needs a long-range plan for addressing beach erosion and its impact on camping operations.

Beach erosion threatens city beach parks and their campsites

In April 2010, the Department of Design and Construction released a consultant report titled, *City Beach Park Erosion Study, Island of O'ahu, Hawaii'i*. The erosion hazard assessment was a comprehensive survey of shoreline conditions at city beach parks. The assessment team conducted site visits to 62 beach parks along the north, east, and south shores²⁰ of O'ahu during the summer and fall of 2008 to assess coastal erosion vulnerability. Evaluators considered the vulnerability of structures and facilities, shoreline erosion and recession, frequency of park use, and the potential environmental impact of erosion. The experts found that Hau'ula Beach Park and Kualoa Regional Park are at high risk due to beach erosion.

Hau'ula Beach Park is at risk for losing its eight remaining campsites

The report noted progressive shoreline erosion. According to the expert consultants, Hau'ula Beach Park was at high risk due to the seawall flanking erosion and undermining. The experts recommended that the city repair, remove, or protect the seawall if it becomes a safety hazard. The consultants further recommended monitoring the comfort station setback from the vegetation line. We conducted a site visit and our observations were consistent with the report's findings. Photos of the erosion's effects (Exhibits 3.10 and 3.11) illustrate the risk to Hau'ula Beach Park and its eight remaining campsites.

²⁰ The study excluded Kea'au Beach Park, Lualualei Beach Park, Maili Beach Park, and Nanakuli Beach Park, which are located on O'ahu's west shore. Ho'omaluhia Botanical Garden is not located along a coast and was also excluded from this study. All other city beach parks that offer camping were included in the study.

Exhibit 3.10
Photo of Erosion at Hau'ula Beach Park



Erosion has caused the seawall along Hau'ula Beach Park to tilt into the ocean.

Source: Office of the City Auditor photo

Exhibit 3.11
Photo of Damage at Hau'ula Beach Park



This barbeque pit has fallen onto the shoreline at Hau'ula Beach Park and creates a safety hazard for campers and beachgoers.

Source: Office of the City Auditor photo

In 2006, Kualoa Regional Park lost 16 campsites

Shoreline erosion in the vicinity of a leach field forced the closure of a comfort station at Kualoa Regional Park. The potential for continued beach erosion and stricter state wastewater guidelines required the city to establish an alternative wastewater system at the park because a connection to the city's main sewer line was not economically feasible. As a result, the city closed 16 campsites in 2006, which remain closed today.

The city has plans to demolish the condemned comfort station, build a replacement bathhouse in an alternate location, and replace the wastewater systems at other comfort stations. The project is currently in the design phase and is under review by the State Burial Council since there are known burial sites in the area. According to a parks and recreation department administrator, there are no immediate plans to restore the 16 campsites even after the capital improvement project is completed.

**Exhibit 3.12
Photo of Closed Kualoa Park Comfort Station**



Comfort Station No. 3 at Kualoa Regional Park was condemned in 2005. As a result, 16 campsites in close proximity were also shut down.

Source: Office of City Auditor photo.

A design and construction department administrator advised that the two most common ways to address impacts from beach erosion are: 1) Beach Nourishment, or sand replenishment, and 2) Shoreline Hardening, which entails building seawalls or revetments. Although the city is taking action to address erosion-related issues, the administrator stated the corrections are costly and cannot guarantee that future erosion will not occur. Sand replenishment, for example, could be completed and the beach or shoreline restored. However, the next month, the sand could disappear again.

City erosion plans may not restore lost camp sites

In response to the consultant report, the city initiated a *Mitigative Improvements at City Parks* capital improvement project. The FY2012 – 2017 CIP budget allocates nearly \$5.3 million for planning, design, and construction related to beach erosion improvements such as rock slide, sea wall, and retaining walls. The parks targeted for this project include Haleiwa Beach Park, Hau'ula Beach Park (which has eight campsites), and Punalu'u Beach Park.

Alternative campsites should be considered

While beachside camping remains popular at city parks, the city may need to establish future campsites at non-beach locations. Currently, the city has only one non-beach campsite, Ho'omaluhia Botanical Garden, which has 29 campsites in a lush tropical setting at the foot of the Ko'olau mountains. The State of Hawai'i has non-beach campsites on O'ahu, Kaua'i, Moloka'i, Maui, and the Big Island. Private camping operators also feature non-beach camping. By increasing the number of non-beach camp sites, the city will be able to offer a variety of camping experiences and reduce the risk of permanently losing campsites at beach parks due to erosion.

Wastewater Facilities Need Repairs or Replacement

We found problems with waster water systems and septic tanks. The system deficiencies and lack of compliance with state and federal wastewater standards at the camping locations place the city at risk for environmental law violations and fines. For example, at Kalaeloa Beach Park, the wastewater system does not meet U.S. Environmental Protection Agency (EPA) standards. At other parks, the city reliance on septic tanks to manage wastewater could result in unauthorized run offs that could result in fines. The existing facilities place the city at risk similar to the \$300,000 fine the city received in 2007 for wastewater violations at Kualoa Regional Park. Although the city plans to upgrade the

wastewater system at Kualoa to comply with state standards and is upgrading wastewater improvements at Waimanalo Bay, additional funds may be needed.

Wastewater Systems Place the City at Risk

The city is spending \$4.9 million at Kualoa Regional Park to remove antiquated wastewater systems and to construct a wastewater system that meets stricter environmental standards. In addition, other wastewater projects include:

- \$425,000 for wastewater upgrades at Waimanalo Bay Beach Park;
- Undetermined funds to replace a cesspool that does not comply with state health department standards at Kalaeloa Beach Park; and
- \$165,000 for wastewater upgrades at Kokololio Beach Park.

Waimanalo Bay Beach Park

In 1972, the military transferred the park lands to the State of Hawai'i. In 1992, the state conveyed the park to the city. Though not mandated by state order, the city is spending \$425,000 to upgrade the wastewater system. The project planning is complete and is in the design phase. When completed, the project will allow the Department of Parks and Recreation to increase the number of campsites from 10 to 22.

No other major improvements to the park facilities or infrastructure have been made since the city received the park.

Kalaeloa Beach Park

The park is leased to the city from the Navy which is negotiating with a private developer to take over the land at Kalaeloa. The city will continue to lease the park land until the Navy transfers title to a new owner.

The park's wastewater system uses a cesspool and is not in compliance with state regulations. The EPA banned the operation of large capacity cesspools in April 2005. Cesspools were found to allow untreated sewage to percolate directly into the soil and ground water, and can contaminate the ocean. Before taking title to the park, the city's Department of Design and Construction began negotiating with the Navy to connect the park's wastewater

system to the Navy's existing sewer system. However, the Navy declined to make any infrastructure improvements until the Kalaeloa lands are sold.

Currently, the city operates 13 campsites at Kalaeloa Beach Park. The operation of the campsites and reliance on cesspools exposes the city to potential violations of federal and state clean water guidelines and fines if the wastewater infrastructure is not upgraded to comply with current EPA standards.

Septic Tanks Could Contaminate the Water Environment

In septic systems, wastewater drains from toilets and sinks into an underground tank. The wastewater then seeps through porous pipes into a leach field, where surrounding sand filters out bacteria and other pathogens. Microbes in the dirt break down organic and inorganic wastes, such as nitrogen. In conventional septic systems, wastewater treatment tends to be inefficient for certain contaminants. As a result, untreated sewage can end up polluting nearby groundwater. According to the U.S. Environmental Protection Agency, malfunctioning septic systems is a common source of beach water pollution. Independent research affirms the EPA's concerns²¹.

Ideally, park facilities such as comfort stations, showers, and other structures that generate wastewater should connect directly to a sewer line. However, this is not always possible or economically viable. For instance Kualoa Regional Park is located approximately 5.5 miles from the city's main sewer line and the connection would cost approximately \$35 million for piping, pump stations, land acquisition, sewer connections, and other costs.

²¹ In 2010, a group of researchers from Stanford University released a report confirming that polluted groundwater flows from coastal septic systems to the sea. The research groups studied flow of groundwater from a large septic system at Stinson Beach 20 miles from San Francisco. Though few microbes made it out of the leach field alive, the scientists discovered a plume of nitrogen-enriched groundwater flowing through the sand toward the ocean. Studies have shown that excess nitrogen can cause harmful blooms of phytoplankton and other algae that choke off oxygen in coastal waters. Septic system technology has not evolved much since the 1950s, so newer systems need to treat wastewater to a higher degree before it is discharged to a leach field.

Less than half of the city parks that offer camping are connected to a sewer system. Most of the city parks rely on septic tanks to manage wastewater. More specifically:

- 8 of the 14 city parks that offer camping rely on septic tanks for wastewater collection;
- 1 park, Kalaeloa Beach Park, utilizes a cesspool system; and
- 5 of 14 city parks that offer camping are connected to sewer lines.

Unfortunately, the septic tanks could result in unauthorized run offs, violation of environmental laws, and fines. Although approved for use by the state health department, use of septic tanks, particularly close to the water, run a high risk of ocean contamination.

Existing Facilities Place the City at Risk

The City was fined \$300,000 for wastewater violations at Kualoa Regional Park. In March 2007, the Clean Water and Wastewater Branch of the Hawai'i State Department of Health issued a Notice of Finding and Violation Order against the city for illegally discharging wastewater at Kualoa Regional Park²². The wastewater discharge came from the comfort stations into state waters in violation of the State Water Quality Standards and Wastewater Rules. As a result, the comfort station nearest the water was condemned in 2005 and 16 campsites were closed to the public.

In January 2010, the city agreed to pay the health department \$300,000 in fines to settle the water quality violations. In addition, the city agreed to replace the park's wastewater system and remove wastewater by pump truck until the replacement system was completed. The city currently deploys pump trucks

²² The state health department warning signs posted at Kualoa Regional Park from December 2, 2005 through May 23, 2006 were based on high bacteria counts in ocean water samples taken off shore near the wastewater comfort station. The department again posted warning signs at the park on January 12, 2007 for the same reasons.

two or more times a week to pump wastewater from septic tanks servicing each comfort station. In 2011, the city's expense to pump out the wastewater tanks at Kualoa Regional Park was estimated at \$8,722 per month.

Exhibit 3.13
Photo of Truck Pumping Wastewater From Kualoa Regional Park Septic Tank



A tanker is seen pumping sewage at Kualoa Regional Park. The city spends about \$8,722 per month for trucks to pump wastewater from comfort station tanks.

Source: Office of the City Auditor photo

City Plans to Spend \$4.9 Million in Wastewater System Upgrades, but Additional Funds May Be Needed

As part of the state settlement agreement, the city will spend approximately \$4.9 million to upgrade Kualoa Regional Park's Wastewater System. The proposed project will demolish and remove the condemned comfort station, build a replacement bathhouse at an alternate location, and replace the existing individual wastewater systems at three other comfort stations with a centralized treatment and disposal system. The centralized wastewater system will create a common treatment and disposal area farther away from the eroding shoreline and establish

maintenance and operations away from heavily-utilized recreational areas. Installation of the new wastewater system is anticipated to be complete in FY2012-13.

Campsite Conditions and Rules Enforcement Also Need Improvement

From FY 2008 to FY 2011, the city received 326 complaints and comments related to the camping program through its Document and Record Tracking program (DART). The top complaints and comments related to illegal camping (74 complaints), maintenance of grounds and greenery (23 complaints), and broken or inoperable restroom fixtures (23 complaints). The top five are shown below. See Appendix 3 for a complete list of DART feedback related to camping.

**Exhibit 3.14
Top Five Camping Program Complaints and Comments (FY 2008 to FY 2011)**

Complaint/Comment	Number of Complaints
Illegal Camping	74
Maintenance of grounds/greenery	23
Bathrooms (Inoperable fixtures)	23
Miscellaneous Questions	21
Permit Concerns	17

Source: City Auditor analysis of City DART system data

**Exhibit 3.15
Illegal Campers at Waimanalo Beach Park**



Illegal campers set up tents at the edge of the foliage line at Waimanalo Beach Park. These campers are not in the permitted camping area.

Source: Office of the City Auditor photo

We conducted site visits to all 14 city parks that offer camping to review and assess the camp conditions. Our review was based on camping and campground standards and maintenance best practices from the states of Michigan, Virginia, and Wisconsin. We evaluated campsites on key indicators such as water system, restrooms, trash areas, greenery, and general management.

We found that proper signage, availability of staff, vandalism, and select sanitary issues at city parks are problematic and could be improved. We did not find any significant concerns regarding the condition of grass areas and foliage, proper trash disposal, and the ratio of male and female restrooms. (See Appendix 3 for examples of areas of concern.)

Exhibit 3.16
Photo of Toilet Paper Dispenser at Maili Beach Park



According to department staff vandals routinely damage restroom facilities. Park staff has resorted to hanging empty plastic containers to hold toilet paper at Maili Beach Park.

Source: Office of the City Auditor photo

Recommendations

The Department of Parks and Recreation should:

- Use the camping permit fee revenue to contract with a private security firm(s) to conduct roving patrols at all city parks that offer camping.
- Use the camping permit fee revenue to fund Parks Detail units within the police department for the Leeward and Windward district parks that offer camping if contracting with a private security firm(s) is not feasible.
- Work with the Department of Design and Construction to conduct a comprehensive assessment of city park infrastructures to include the status of wastewater systems, proximity of wastewater systems to the shoreline, general conditions, and recommendations and ranking for any upgrades needed.
- Use the camping permit fee revenue to prioritize routine operations and maintenance needs and capital projects for improving camping facilities.
- Consider non-beach camping sites for future expansion of the camping program.

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Chapter 4

Administrative Improvements Are Needed

The Department of Parks and Recreation has improved its camping operations, including activating an online camping permit system and hiring a Camping Specialist to focus on the camping program. We found, however, that more needs to be done. More specifically, the department needs to formalize the camping program. Formal policies, procedures, and an operations manual for camping are needed. A quality assurance program and complaint follow-up system could improve program quality. These deficiencies affect the quality and credibility of the camping program and could expose the city to financial liabilities.

Department of Parks and Recreation Camping-Related Initiatives

In March 2012, the parks and recreation department established an online camping permit system. Prior to the online conversion, campers were required to stand in line, sometimes overnight, to obtain camping permits. The online system made it easier for the public to obtain camping permits. In addition, the department hired a Camping Specialist in 2011 to assist the department with implementing the online permitting system and fees; working with park keepers and the police to enforce park rules; educating campers on park rules; and codifying camping rules. This position provides a focus on the camping operation.

Department Needs to Formalize the Camping Program

Although the department offers camping at 14 city parks, these parks are not exclusive to camping. Rather, they are public city parks where camping is authorized. Thus, camping is not a formal city program. Camping does not have a separate budget, nor does the department track expenditures allocated specifically to camping. With the enactment of Ordinance 11-20, both the city council and administration have acknowledged camping as an important city function. Camping is also poised to become a revenue-generator for the city and should be recognized as a stand-alone function. The department should develop the camping operation into a formal camping program.

Inaccurate Camping Permit Report Data Misrepresented Demand

Over the last four years, camping permit distribution data reported by the department were inaccurate. The department's FY 2008 annual report states that the department issued 5,956 camping permits. However, the data from all the permitting locations indicated 9,298 camping permits were issued, a difference of 3,342. In FY 2011, the department's annual report stated 10,107 issued permits were distributed. We found that a total of 8,927 permits were actually issued. (See Appendix 5 for more details) Exhibit 4.1 compares the department's reported data versus the actual camping permit data.

**Exhibit 4.1
Total Camping Permits Actually Issued Versus Reported
(FY 2008 to FY 2011)**

Fiscal Year	Camping Permits Issued (Actual)	Camping Permits Reported (Annual Report)	Discrepancy
FY 2008	9,298 ²³	5,956	3,342
FY 2009	9,972	6,486	3,486
FY 2010	10,236 ²⁴	10,400	(164)
FY 2011	8,927	10,107	(1,180)

Source: Office of the City Auditor analysis of Department of Parks and Recreation records

We concluded that the lack of a formal permit tracking system caused the department to report inaccurate data. The department's annual report states that the Parks Permit Section is responsible for coordinating, monitoring, and reviewing the issuance of camping permits. We found for FY 2008 and 2009, the Parks Permit Office only tracked the number of camping permits issued by that office and did not include the permits issued at other distribution locations. As a result, the camping permit data included in the annual report was incomplete and excluded permits issued by the Satellite City Halls and the

²³ Permits issued at Ho'omaluhia Botanical Garden were not available for FY 2008.

²⁴ As of May 2010, Parks Permit Office, Kapolei Satellite City Hall, Wahiawa Satellite City Hall, and Ho'omaluhia Botanical Gardens were the only permit locations.

Ho'omaluhia Botanical Gardens. The inaccurate data reported by the department also skewed actual demand for camping.

Formal Policies, Procedures, and an Operations Manual for Camping Are Needed

According to the Commission for Accreditation of Park and Recreation Agencies, government entities need an operations manual that sets up-to-date policies and procedures for camping programs, and standardizes operations. The manual should be readily available to department personnel. The commission further recommends establishing a system for communicating accurate and timely camping information. According to the commission, the input and involvement of personnel from the various agency levels encourages employees to contribute to the management and operation of the agency and has great value in attaining the program goals and objectives.

Staff Camping Operations Manual is needed

We found the department's camping program lacked a camping manual. The manual would provide standards and operating procedures for correcting and resolving the deficiencies we observed. The manual standards would help to ensure park amenities and operations are consistent for all campsites; that department personnel obtain and maintain data in a form that can be used to evaluate and improve the camping program; and that important information is available to protect the city if lawsuits are filed.

The staff camping manual could also be used to provide standardized operating instructions for handling emergencies; provide information and services to campers; help city staff enforce camping rules; and improve security.

Signs are not standardized

Best practices note that model campgrounds mark or arrange a site so that campers can readily identify and locate the site. Some campsites we visited had no signage at all, which made it difficult for campers to find their designated campsites or to identify their campsite boundaries. We believe consistent, standardized camp signage at city campsites would give campers a more professional image of the city; help campers to readily identify camp sites; and improve the camping experience.

At other campsites, we found different signage and methods in use. Some campsite signs or markers were numbers spray painted on trees and rocks; others had thin wooden posts with signs attached; others had metal posts with signs attached; and

still others used thick wooden logs with a numbered placard. See Appendix 6 for an inventory of the various types of signage used at city parks.

Staff contact and emergency info were not posted

Best practices recommend that campsites provide signage with adequate information, particularly the name of the manager on duty or where the manager can be contacted when the manager is not on duty. The staff contact information is especially important when emergencies occur. We found that only Ho'omaluhia Botanical Garden campsites had such information posted.

**Exhibit 4.2
Photo of Emergency Contact Information at Ho'omaluhia Campsite**



Signage like this one, posted throughout the campsites at Ho'omaluhia Botanical Garden, provide campers with important information, which enhances the camping experience.

Source: Office of the City Auditor photo

Staff not on-site

Best practices suggest that a manager or designee be available when the campground is occupied. We found that only three campsites (Ho'omaluhia, Kualoa, and Waimanalo Bay) had a designated person on-site when the campground was occupied. The three parks had city employees living on-site who were available during weekends and evenings. Other parks had on-site city employees only during traditional working hours, or did not have a manager or other employee on-site.

Field logs and communications were not uniform

Best practices recommend that agencies collect statistics on its programs and services for evaluation and future program and service evaluation. Field logs that document park incidents, complaints, or issues is an example of this practice. We found that campsites are not required to maintain field logs. Field logs are maintained and completed at the discretion of a park administrator. As a result, data tracking and communications varied between parks or did not exist.

- At two camping parks, camp staff voluntarily initiated and maintained camping logs and records that helped park staff stay current on campground incidents and provided a form of written communication. The field logs recorded when personnel checked camping permits, ensured campers were at the correct site, and recorded when staff checked vehicle permits.
- According to the park administrator, specific guidelines or manuals related to the overall camping program do not exist. Consequently, written field logs and records were not found at all camp sites and were not available if incidents occurred.
- When logs or records were found, the logs and data were not standardized. For example, at one camping park, the log consisted of a daily diary and the data contents were not the same as other campsites.

A Quality Assurance Program and Complaint Follow-Up System Could Improve the Program Quality

The department's goal is to provide parks and recreational opportunities that are accessible, enjoyable, meaningful, safe, well-designed and well-maintained. According to the Commission for Accreditation of Park and Recreation Agencies, programs should be evaluated regularly and systematically to measure how stated objectives were met. In addition, agencies should monitor and evaluate the quality of its programs, services, areas and facilities from the user's perspective. The commission states that park and recreation agencies must be sensitive to the issue of quality assurance and customer relations; i.e., there must be total quality management.

The department does not have a quality assurance program for camping operations nor does it have an effective way to obtain feedback from campers. As a result, the department lacked an effective tool to gauge camper needs, to determine if improvements to the program are working, and to determine if camper complaints were resolved.

We believe the current online camping permit system could provide the department an electronic survey tool that is cost effective and flexible to use. The data collected could provide the department with important operational information it can use to improve the camping program.

Online Permitting System Can Issue Camping Permits, but Does Not Collect Fees

The Department of Parks and Recreation improved the camping permit process by establishing an online camping permit system in March 2012. Only the online camping permit issuance portion of the vendor system was activated. The online collection of camping fees was not activated. According to the department administrator, ending long lines and amending camping rules were a higher priority. Although Ordinance 11-20 established camping fees effective June 21, 2011, the department has not collected any camping permit fees. Instead, the department is opting to amend its camping rules before collecting camping permit fees. Before the city initiates *e-commerce*²⁵ transactions, the city should ensure its online camping permit system complies

²⁵ *E-commerce* is the buying and selling of products or services over electronic systems such as the internet or other computer networks.

with requirements for e-commerce systems. Failure to address e-commerce issues could expose the city to significant financial losses if a security breach occurs.

The department contracted with a third-party consultant to develop the online camping permit system

In October 2011, the Department of Information Technology contracted with a third-party consultant to develop an online camping permit system. The work activities included analysis, planning, designing and building, testing, and deploying the online system into the *cloud*²⁶. The general objective was to develop an online camping permits system, where the public could reserve camping permits, pay for them with credit cards, and receive permits, all via the Internet. The city paid the consultant \$69,783 for a complete camping permit system.

The deliverables included a payment processing system that connected to the internet and processed credit card transactions through service providers' production sites. The deliverables also included a Secure Socket Layer (SSL) license installation to protect data transferred over the internet, and assurance that the host system application complied with Payment Card Industry-Data Security Standards (PCI-DSS). The consultant's system internal specification (SIS) document dated February 29, 2012, noted that the online camping permit system evolved away from collecting camping permit fees. As a result, none of the fee collection payment-related components were operational when the online camping permit system went live in March 2012 and no fees are being collected.

Going Forward, the City Needs to Ensure That Its Interests Are Protected

Administrators from the Departments of Budget and Fiscal Services and Information Technology reported they are developing an in-house, alternative fee collection system that uses *PayPal* vendor services. The administrators also noted that the departments are also developing policies and procedures to allow administrative functions such as auditing, management reports, permit and payment reconciliations, and payment adjustments.

²⁶The *cloud* is the use of computing resources (hardware and software) to deliver services over the internet. The services include storing data, software application, computations, payment collections, electronic funds transfer, and other e-commerce activities.

In response to our concerns about the lack of a complete online camping system, the information technology department demonstrated its prototype system for fee collections. We acknowledge the work done by the information technology and parks and recreation departments to complete the system. Since actual fee collection is not occurring, we remain concerned about certain aspects of the system and the Departments of Parks and Recreation's and Information Technology's responsibilities to protect the city's interests.

Failure to comply with e-commerce (PCI-DSS) requirements could expose the city to financial liabilities and losses

The Payment Card Industry-Data Security Standards (PCI-DSS) is a multifaceted security standard that includes requirements for security management, policies, procedures, network architecture, software design and other critical protective measures. This comprehensive standard is intended to help organizations proactively protect customer account data. Credit card payments must comply with PCI-DSS requirements. When the department decides to accept payments for camping permits, the city needs to ensure the city, credit card processor, internet payment processor, and other vendor systems are in compliance with the PCI-DSS standards. The city could be liable for all investigations costs and financial damages incurred by the credit card vendors, credit card holders, and financial institutions if unauthorized access to the credit card information occurs.

According to a Department of Budget and Fiscal Services administrator, the department follows Policy 31.22, *Credit and Debit Card Processing*. The policy states that all department/agencies accepting credit and debit card payments are to comply with PCI-DSS to protect the private financial information of the cardholder. We note that the policy covers city departments and agencies. The policy does not extend to private entities. We asked a department administrator if the city's agreements with third party vendors to administer credit card payments contained PCI-DSS requirements. The administrator explained that while the city's agreements do not specify the requirement, the accepted practice for credit card merchants is to utilize PCI-DSS compliant entities. We acknowledge the industry's standards and practices, but to fully protect the city from liability, agreements with credit card merchants should contain PCI-DSS compliance requirements.

The parks and recreation department needs to more actively monitor the online system

On March 9, 2012, the camping operations online system was implemented. Under the Mayor's Directive No. 06-02, Section 1.3, item #4, the Department of Information Technology director is required to provide sufficient security policies and procedures to maintain data integrity; protect data from loss, misuse, and unauthorized access; and ensure compliance with copyright and privacy laws. Under the department's current Security Policy, each city department (in this case, Department of Parks and Recreation) is responsible for the information collected by the online camping system.

The parks and recreation department used a third party entity to host, maintain, and secure the application and database in the cloud. According to an information technology department administrator, the department does not actively monitor the online camping system. Rather, the department serves as a resource for city agencies in developing network systems. If the parks and recreation department does not monitor the online permitting system, more errors and discrepancies may occur and could create an unreliable and faulty camping permitting system. That is, the Department of Parks and Recreation should not rely on a third-party vendor because the department is still the owner of the data and processes, and is responsible for managing the system.

For example, on the day that the online camping permitting system went live, we observed the department's website and noted that 16 campsites at Kualoa Regional Park were available for permitting although these campsites were closed in 2005 due to a condemned comfort station. We immediately brought this to the department administrator's attention who was unaware of the error.

Furthermore, we asked a parks and recreation department administrator to describe the type of monitoring activities that the department performed as they related to the online permitting system. The administrator acknowledged that while the permitting system has a multitude of data tracking capabilities, the department does not monitor operations data or generate reports on a regular basis.

The information technology department technical administrator commented that its third-party *cloud* vendor monitors performance. The technical administrator confirmed that the cloud administrator's role is to ensure the system has adequate resources to operate the system, but does not monitor the data in the system.

Based on our discussion, the Department of Information Technology and the third-party vendors are relying on the Department of Parks and Recreation staff to ensure the system data is correct and to make recommendations for improving the system. However, no one in the parks and recreation department that was involved with the online system has the information systems background to adequately monitor and manage the system, its performance, or the database.

Recommendations

The Department of Parks and Recreation should:

- Formalize the camping program by identifying key personnel to manage the program, establishing a separate program budget, and developing measurable goals and objectives.
- Accurately track, monitor, and report camping permit data (usage) using its online camping permit report-generating capabilities.
- Establish a standards manual for its camping program.
- Utilize its online system capabilities to establish a quality assurance program by conducting electronic surveys to obtain camper feedback.
- Take an active role in managing its online system by ensuring that qualified staff is monitoring the program, assessing system adequacy, and recommending improvements to the Department of Information Technology and third-party vendors. The parks and recreation department should assign its online system and database accuracy responsibilities to an individual(s) with a qualified background in information technology systems.

The Department of Budget and Fiscal Services should:

- Include PCI-DSS requirements in all of its contracts with credit card merchants and other appropriate vendors.

Chapter 5

Conclusion and Recommendations

The City and County of Honolulu is fortunate to have some of the most beautiful beach parks in the world. However, residents do not feel that government is exercising good stewardship of our natural and community resources. Honolulu's 2011 National Citizen Survey™ results showed that 60 percent of citizens rated the city's parks as excellent or good. This ranking was much below benchmarks both nationally and for cities with populations exceeding 300,000. Our audit report findings are consistent with these results. Nevertheless, the Department of Parks and Recreation has an opportunity to make significant improvements to city parks that offer camping under a new camping permit fee structure established by city ordinance.

Substantive improvements to the camping program, however, are unlikely unless the department has direct access to the camping permit fee revenues. Creation of a special fund or other mechanism to carve-out the fee revenues are needed to ensure that the camping program is the exclusive beneficiary of the newly established camping fees. Some city administrators argue that the camping permit fee revenues should be used to offset the cost of operating the camping program and, as a result, the fees rightfully belong in the general fund. We disagree. In our opinion, the city council did not intend for the revenues to merely offset the cost of the camping program, but that meaningful improvements would be made to the program as a result of the new fees.

If the parks and recreation department is able to secure access to the camping permit fee revenues, it can address some program shortfalls. Security at city park campsites is a top priority. Honolulu Police Department data show that officers responded to 5,652 service calls to city parks with camping from FY 2008 to FY 2011. Noise, arguments, and nuisance complaints are the most common types of calls. Security at city parks that offer camping is irregular. Three city parks provide private security patrols. Other parks have city personnel living on-site to provide security and other duties. Two parks have both private security and city personnel living on-site. Leeward Coast parks have a dedicated Parks Detail unit to patrol city parks. Five parks have no enhanced security services. We recommend that the department utilize some of the camping permit fee revenues to pay for additional security.

Camping facilities and infrastructure need improvement. In 2005, Kualoa Regional Park lost 16 campsites due to the closure of a comfort station. The comfort station was closed after the State of Hawai'i health department cited the city for wastewater violations, including a \$300,000 fine. Hau'ula Beach Park's 8 campsites are at risk due to beach erosion. We recommend that the department work with the Department of Design and Construction or a private entity to conduct an assessment of all park infrastructures, particularly wastewater systems that may threaten the parks' viability. Preserving campsites has taken on heightened importance because the camping program is poised to become a revenue-generating asset to the city.

The city established an online system to distribute camping permits. The system functions as a reservation system, but fee collection has been put on hold. The department has opted to amend its camping rules before assessing the camping permit fee. As a result, the city did not collect over \$366,000 in potential revenue between July 2011 and July 2012. Once the system becomes fully operational, the parks and recreation department needs to ensure that the system complies with e-commerce requirements and that properly trained personnel is monitoring the system and safeguarding the city's interest.

Recommendations

The Department of Parks and Recreation should:

1. Expedite amendment of the camping rules so that it can begin collecting camping permit fees.
2. Establish procedures that recognize the camping permit fee revenues and ensure revenues are used to benefit the camping program if the budget and fiscal services department does not establish a special fund for the collection of camping permit fee revenues. The procedures should include an annual report to the city council that details the amount of revenues collected and how camping permit fee revenues were used.
3. Develop a formal plan for how it intends to use camping permit fee revenues to maintain and improve the camping program.
4. Justify the convenience fee amount before it is charged to campers.

5. Work with the city council to amend the Ordinance 11-20's fee structure so that it conforms to the department's fee implementation plans.
6. Use a portion of the camping permit fee revenue to contract with a private security firm(s) to conduct roving patrols at all city parks that offer camping.
7. Use a portion of the camping permit fee revenue to fund Parks Detail units within the police department for the Leeward and Windward district parks that offer camping if contracting with a private security firm(s) is not feasible.
8. Work with the Department of Design and Construction to conduct a comprehensive assessment of city park infrastructures to include the status of wastewater systems, proximity of wastewater systems to the shoreline, general conditions, and recommendations and ranking for any upgrades needed.
9. Use the camping fee revenues to prioritize routine operations and maintenance needs and capital projects for improving camping facilities.
10. Consider non-beach camping sites for future expansion of the camping program.
11. Formalize the camping program by identifying key personnel to manage the program, establishing a separate program budget, and developing measurable goals and objectives.
12. Accurately track, monitor, and report camping permit data (usage) using its online camping permit report-generating capabilities.
13. Establish a standards manual for its camping program.
14. Utilize its online system capabilities to establish a quality assurance program by conducting electronic surveys to obtain camper feedback.
15. Take an active role in managing its online system by ensuring that qualified staff is monitoring the program, assessing system adequacy, and recommending improvements to the Department of Information Technology and third-party vendors. The parks and recreation department should assign its online system and database accuracy responsibilities to an

individual(s) with a qualified background in information technology systems.

The Department of Budget and Fiscal Services should:

16. Establish a special fund for the collection of camping permit fee revenues to ensure that the camping program directly benefits from the fees collected.
17. Include PCI-DSS requirements in all of its contracts with credit card merchants and other appropriate vendors.

The City Council should:

18. Consider amending Ordinance 11-20 to rescind or amend the \$2 administrative fee authorized to cover camping permits administrative costs if the Department of Parks and Recreation can not justify the fee.

Management Response

The Managing Director, on behalf of the Departments of Parks and Recreation and Budget and Fiscal Services, agreed with most of the recommendations. The parks and recreation department disagreed with our recommendation to formalize the camping program and establishing a separate camping budget. The department noted that various park programs share resources and it would be difficult to parse services. While we acknowledge that the camping operation shares resources with other park programs, unless the department can allocate costs directly, or develop a formula to allocate costs and resource use among users, the city will not be able to identify the true cost of the camping program.

The Department of Budget and Fiscal Services disagreed with the recommendation to establish a special fund for the collection of camping permit fee revenues to ensure that the camping program directly benefits from the fees collected. Subsequent to our fieldwork, management reported that it had established a revenue account within the general fund as required by Ordinance 11-20. We are encouraged that the budget and fiscal services department has followed the ordinance's requirement to establish the separate revenue account; during fieldwork, department administrators advised us that revenues would be deposited into the general fund. While we maintain that a special fund will provide the most assurance that camping permit fee revenues will be used to benefit the camping program directly, the separate revenue

account, coupled with the annual reporting requirement that we recommended, could provide the council and public with adequate information and oversight.

The budget and fiscal services department also disagreed with our recommendation to include PCI-DSS requirements in all of its contracts with credit card merchants and other appropriate vendors because the department already has guidelines for accepting and processing credit and debit cards, including compliance with PCI-DSS requirements. The department's policies and procedures notwithstanding, we believe the city's interests would be better served if PCI-DSS requirements are also included in vendor contracts.

We made technical, non-substantive changes to the draft report for purposes of accuracy, clarity, and style.

We thank the Managing Director and the Departments of Parks and Recreation, Budget and Fiscal Services, Information Technology, and Honolulu Police Department for their assistance during this audit. A copy of the Managing Director's full response can be found on page 64.

**OFFICE OF THE MAYOR
CITY AND COUNTY OF HONOLULU**

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PETER B. CARLISLE
MAYOR



DOUGLAS S. CHIN
MANAGING DIRECTOR
CHRYSTN K. A. EADS
DEPUTY MANAGING DIRECTOR

October 10, 2012

Mr. Edwin S. W. Young, City Auditor
Office of the City Auditor
City and County of Honolulu
1001 Kamokila Boulevard, Suite 216
Kapolei, Hawaii 96707

Dear Mr. Young:

Thank you for the opportunity to comment on your draft audit report dated September 24, 2012 regarding the department of parks and recreation's camping operations. The administration's responses to the draft audit recommendations (in italics below) are as follows:

The department of parks and recreation (DPR) should:

1. *Expedite amendment of the camping rules so that it can begin collecting camping permit fees.*

DPR agrees with this recommendation. Camping rules are currently being reviewed by corporation counsel as part of accepted standardized procedures. Quoting from the city's audit:

A budget and fiscal services administrator, speaking on behalf of the parks and recreation department, disagreed with our assessment related to the delay in the camping fee collection. The administrator explained that there is a process that the budget and fiscal services department follows when starting a new initiative such as camping permits. First, an ordinance must be passed to authorize a program. Second, applicable rules and regulations need to be amended, through the rule-making process, to effectuate the ordinance. Third, the department must develop specifications for implementing the program; in this case, the new camping permit fees. Therefore, the camping permit system is being implemented according to established processes."

Presently, rules have been drafted. The corporation counsel is reviewing them. When the rules are returned to DPR, DPR will finalize the rules for the mayor's signature and hold a public hearing. If there are no substantive changes to the proposed rules, we will then send the proposed rules to corporation counsel for approval as to form and legality, then to the mayor for

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his signature. Upon promulgation of the rules, a public notice will be issued notifying the public of the changes and a fee charge and the effective date.

2. *Establish procedures that recognize the camping permit fee revenues and ensure revenues are used to benefit the camping program if the budget and fiscal services department does not establish a special fund for the collection of camping permit fee revenues. The procedures should include an annual report to the city council that details the amount of revenues collected and how camping permit fee revenues were used.*

DPR agrees with this recommendation. DPR incorporated changes to the camping procedures in its annual report and will submit quarterly internal reports beginning with collection of fees. Quoting from the city's audit, "[c]reation of a special fund would provide the most assurance that camping fee revenues will be used exclusively for the camping program. In the draft report, the department of budget and fiscal services provided their input regarding special funds. DPR will include in its revenue report the monies collected from the camping fees. Presently, monies allotted in our current expense budget covers the cost for salaries, maintenance and improvements.

Quarterly internal reports are predicated on the idea that this procedure may become a necessary function of organized camping in the city. These reports would include quality assurance data taken from the online camping program's design reinforced customer polling function. After a year of both gathering real time information and keeping DPR apprised of the camping program's status, DPR will be in the position to better inform the city council of all particulars involved. Establishing a regular report for the city council should be a natural outcome.

3. *Develop a formal plan for how it intends to use camping permit fee revenues to maintain and improve the camping program.*

DPR agrees with this recommendation in concept but notes it would be difficult, at this point, to earmark monies going into the general account for improvements to the camping program. Assuming a special account is established, the monies collected from the camping fees may be dedicated to improvements such as security/enforcement, creating camping site boundaries, rehabilitating comfort stations, etc. to enhance the camping experience.

4. *Justify the convenience fee amount before it is charged to campers.*

DPR agrees with this recommendation. The first year of camping fees will not include the five dollar convenience fee. During the first year, DPR will gather real time data on costs and the responsible application of the five dollar convenience fee rather than relying on projections based on data not intended for this application. After gathering and analyzing the data, DPR will responsibly apply the convenience fee up to a five dollar limit.

5. *Work with the city council to amend the Ordinance 11-20's fee structure so that it conforms to the department's fee implementation plans.*

DPR agrees with this recommendation and shall submit the revisions to the ordinance prior to the promulgation of the rules.

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6. *Use a portion of the camping permit fee revenue to contract with a private security firm(s) to conduct roving patrols at all city parks that offer camping.*

DPR agrees with this recommendation and included improving security as part of its improvement plan.

7. *Use a portion of the camping fee revenue to fund parks detail units within the police department for the leeward and windward district parks that offer camping if contracting with a private security firm(s) is not feasible.*

This is a policy decision for the next administration and city council. Further discussions should be pursued with the Honolulu police department (HPD). Only HPD controls and manages its assets according to need.

8. *Work with the department of design and construction to conduct a comprehensive assessment of city park infrastructures to include the status of wastewater systems, proximity of wastewater systems to the shoreline, general conditions, and recommendations and ranking for any upgrades needed.*

DPR agrees with this recommendation. A survey of comfort stations in parks and their conditions was completed in recent years and the director of DPR feels quite certain the information is current. DPR has used this list as a guideline when applying for capital improvement funds. DPR will continue to obtain feedback from campers and incorporates this during its reports to the city council during budget hearings.

DPR's priorities for capital improvements have been: 1) repairing leaking roofs, 2) reconstructing existing play courts, and 3) replacing worn or unsafe play apparatuses. These priorities are established to extend the life of city facilities within the city's budgetary guidelines for capital improvements.

9. *Use the camping fee revenues to prioritize routine operations and maintenance needs and capital projects for improving camping facilities.*

This is a policy decision for the next administration and city council.

10. *Consider non-beach camping sites for future expansion of the camping program.*

DPR agrees with this recommendation. As you know, DPR already includes Hoomaluhia in Kaneohe in its portfolio but will explore the feasibility of more inland campsites.

11. *Formalize the camping program by identifying key personnel to manage the program, establishing a separate program budget, and developing measurable goals and objectives.*

DPR disagrees with this recommendation. DPR acknowledges the intention of this suggestion but respectfully notes that programs in parks share many resources, not the least of which are the parks themselves. Cleaning and maintenance are only a few functions that cross from the recreation side of the park to the campgrounds. Water is another common resource. If

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DPR provides security for campgrounds, this responsibility will not adequately address these boundaries. DPR is unwilling to parse services at this time.

12. *Accurately track, monitor, and report camping permit data (usage) using its online camping permit report-generating capabilities.*

DPR agrees with this recommendation. DPR will attempt to accomplish this with the help of the department of information technology.

13. *Establish a standards manual for its camping program.*

DPR agrees with this recommendation. Camping rules have been promulgated. After signing by the mayor, DPR will have the framework for the city's camping manual. Planning and discussions have progressed, as time allowed, for many months. Upon completion the city council will be provided with copies.

14. *Utilize its online system capabilities to establish a quality assurance program by conducting electronic surveys to obtain camper feedback.*

DPR agrees with this recommendation and is on track to do this.

15. *Take an active role in managing its online system by ensuring that qualified staff is monitoring the program, assessing system adequacy, and recommending improvements to the department of information technology and third-party vendors. The parks and recreation department should assign its online system and database accuracy responsibilities to an individual(s) with a qualified background in information technology systems.*

DPR agrees with this recommendation and will work closely with the department of information technology to do this.

The department of budget and fiscal services (BFS) should:

16. *Establish a special fund for the collection of camping permit fee revenues to ensure that the camping program directly benefits from the fees collected.*

BFS does not agree with this recommendation. In the meantime, a separate camping revenue account has been established in the general fund as required by Ordinance 11-20. No further action is planned.

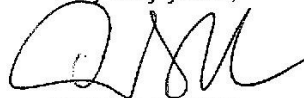
17. *Include PCI-DSS requirements in all of its contracts with credit card merchants and other appropriate vendors.*

BFS does not agree with the recommendation. The BFS Policies and Procedures Manual Index 31.22, Credit and Debit Card Processing, provides guidelines for accepting and processing credit and debit cards, including compliance with PCI-DSS requirements. No further action is planned.

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During this administration, responsible steps were taken to set up online camping registration and lay the groundwork for revenue generation through camping fees. In the meantime, the city remains committed to providing safe and healthy camping facilities to the people of the city and county of Honolulu during fiscally tough times. Your input and observations, as always, are appreciated.

Very truly yours,



Douglas S. Chin

cc: Michael Hansen, Director, Department of Budget and Fiscal Services
Gary B. Cabato, Director, Department of Parks and Recreation

Appendix 1

Department of Parks and Recreation Roles, Responsibilities, and Expenditures

Administration. Administration provides administrative, management support, and personnel services to the department for overall park operations and systems relating to budget and purchasing operations; planning; park use permits; and storeroom and property inventory control. It also provides services related to management analyses, personnel transactions, labor relations, collective bargaining issues, training, safety programming, driver evaluations, and payroll preparation.

Appendix A1.1 Administration Expenditures, FY 2008 to FY 2011

	<i>Expenditures</i>	<i>General Funds Expended</i>	<i>Special Projects Funds Expended</i>	<i>No. of FTE</i>	<i>Camping Permits Issued*</i>
FY 2008	\$2,664,625	\$2,664,625	-	30.50	5,956
FY 2009	\$2,419,775	\$2,321,735	\$98,040	30.50	6,486
FY 2010	\$2,222,376	\$2,134,199	\$88,177	30.50	10,400
FY 2011	\$2,107,668	\$1,983,202	\$124,466	30.50	10,107
% change over three years	-20.9%	-25.6%	-	-	69.7%

*Count from Permits Office at Fasi Municipal Building (Not including Satellite locations)

Source: Office of the City Auditor Analysis

Grounds Maintenance. Grounds Maintenance provides grounds keeping, custodial, and maintenance services to all parks and recreation facilities on the island of O’ahu.

**Exhibit A1.2
Grounds Maintenance Expenditures, FY 2008 to FY 2011**

	Expenditures	General Funds Expended	Bikeway Funds Expended	HBNP ¹ Funds Expended	No. of FTE	No. of City Parks	Camping Parks*
FY 2008	\$22,860,904	\$22,309,437	\$9,822	\$541,645	448.50	284	14
FY 2009	\$24,978,437	\$24,373,190	\$17,069	\$588,178	458.50	284	14
FY 2010	\$23,903,624	\$23,287,215	\$12,272	\$604,137	458.50	288	14
FY 2011	\$21,905,569	\$21,356,134	\$13,320	\$536,115	466.50	288	14
% change	-4.2%	-4.3%	35.6%	-1.0%	4.0%	1.4%	-

¹Hanauma Bay Nature Preserve

*Does not include Ho’omaluhia Botanical Gardens (Urban Forestry Division)

Source: Office of the City Auditor analysis

Maintenance Support Services. Maintenance Support is responsible for providing minor repair and/or replacement services to park buildings, ground facilities and equipment island-wide.

**Exhibit A1.3
Maintenance Support Services Expenditures, FY 2008 to FY 2011**

	Expenditures	General Funds Expended	HBNP ¹ Funds Expended	No. of FTE
FY 2008	\$6,702,405	\$6,443,876	\$258,529	81.00
FY 2009	\$5,668,620	\$5,668,620	0	81.00
FY 2010	\$5,219,460	\$5,179,281	\$40,179	81.00
FY 2011	\$4,652,139	\$4,652,139	-	81.00
% change	-30.6%	-27.8%	-	-

¹Hanauma Bay Nature Preserve

Source: Office of the City Auditor analysis

Appendix 2

Exhibit A2.1

Honolulu Police Department Response Calls to Parks That Offer Camping, FY 2008 to FY 2011

	Hau'ula	Kaiaka	Keaau	Kokololio	Kuatoa	Lualualei	Nanakuli	Waimanalo Bay	Waimanalo Beach	Bellows	Ho'omaluhia	Kalaieoa	Mali	Swanzy	Total	%
1 Noise Complaint	159	7	601	40	7	2	70	0	35	19	0	0	116	12	1068	19%
2 Argument	61	53	254	17	29	0	76	0	148	22	0	0	117	17	794	14%
3 Misc. Service call	53	34	149	35	59	0	50	0	114	38	0	1	51	14	598	11%
4 Nuisance complaint	37	25	164	32	32	0	54	0	81	31	0	0	99	26	581	10%
5 Misc. Public	9	9	52	9	22	0	24	0	33	31	0	0	31	5	225	4%
6 Parking violation	8	17	63	1	10	0	22	0	44	15	0	0	17	14	211	4%
7 Suspicious Circumstances	17	16	51	2	20	0	21	1	29	11	0	0	23	3	194	3%
8 Hazardous Driver	7	5	6	4	55	0	19	0	40	17	0	0	17	6	176	3%
9 Traffic Stop	13	27	25	13	14	0	13	0	21	12	0	0	8	4	150	3%
10 UEMV	4	1	13	2	44	0	1	1	35	17	0	0	8	1	127	2%
11 Investigation	9	2	10	4	3	0	6	0	7	61	0	0	2	2	106	2%
12 Traffic Complaint	10	4	13	4	20	0	19	0	14	8	0	0	11	2	105	2%
13 MVA	13	1	9	6	14	0	17	0	12	5	0	0	17	2	96	2%
14 Misc. Crime Offense	0	1	19	1	2	0	14	0	7	1	0	0	36	1	82	1%
15 Theft	4	3	10	1	6	0	5	0	23	17	1	0	9	3	82	1%
16 Dropped call	15	16	10	0	0	0	0	0	34	0	0	0	2	3	80	1%
17 Vehicle Tow - Abandon	3	8	34	1	1	0	6	0	5	2	0	0	7	2	69	1%
18 Warrant Arrest	2	16	18	1	2	0	5	0	13	2	0	0	6	1	66	1%
19 Out of service	11	6	11	4	4	0	5	0	8	7	0	0	7	1	64	1%
20 Assault, simple	4	3	17	1	10	0	3	0	16	4	0	0	3	0	61	1%
21 Property damage	9	3	12	2	2	0	9	0	14	3	0	0	6	1	61	1%
22 Fireworks Violation	15	0	3	2	2	0	6	0	9	1	0	0	3	0	41	1%
23 Follow-up	5	3	10	1	4	0	6	0	4	1	0	0	5	2	41	1%
24 Family argument	0	5	12	1	2	0	3	0	6	2	0	0	6	1	38	1%
25 Loud party	5	0	3	4	0	0	3	0	6	4	0	0	12	0	37	1%
26 ICF/SCF	0	0	8	3	5	0	4	0	9	5	0	0	2	0	36	1%
27 MVA - Vehicle Towed	1	0	10	4	8	0	3	0	4	3	0	0	1	2	36	1%
28 Suspicious Person	3	0	6	0	5	0	1	0	5	3	0	0	2	3	28	0%

	Hau'ula	Kaiaka	Keaau	Kokololio	Kualoa	Lualualei	Nanakuli	Waimanalo Bay	Waimanalo Beach	Bellows	Ho'omaluhia	Kalaiea	Mali	Swanzy	Total	%
29 Medical Assistance	1	2	8	1	4	0	2	0	3	1	0	0	2	1	25	0%
30 Found property	2	4	0	2	6	0	0	0	8	1	0	0	1	0	24	0%
Juvenile nuisance	4	2	1	4	0	0	4	0	3	2	0	0	3	1	24	0%
31 Motor Vehicle Theft	0	2	9	0	4	0	1	0	1	4	0	0	1	0	22	0%
32 Family Offense/neglect	0	4	8	0	1	0	2	0	3	2	0	0	1	0	21	0%
33 Aggravated Assault	1	2	8	0	0	0	2	0	2	1	0	0	4	0	20	0%
34 Auto Theft	0	2	11	0	1	0	0	0	2	0	0	0	1	0	17	0%
35 Recovery	2	0	9	0	1	0	1	0	2	0	0	0	1	1	17	0%
36 Threatening	2	2	2	0	3	0	2	0	1	0	0	0	1	1	14	0%
37 Suspicious Vehicle	0	2	2	1	3	0	0	0	2	1	0	0	2	0	13	0%
38 Harassment	1	0	4	1	0	0	0	0	1	4	0	0	1	1	13	0%
39 Smoke/fire nuisance	0	1	2	0	1	0	1	0	2	0	0	0	3	1	11	0%
40 Drunk nuisance	0	0	5	0	2	0	1	0	1	1	0	0	1	0	11	0%
41 Fire call	0	1	3	0	0	0	1	0	1	0	0	0	5	0	11	0%
42 Weapons	1	0	2	1	0	0	1	0	4	0	0	0	1	0	10	0%
43 Burglary	2	0	0	0	0	0	1	0	2	0	0	0	5	0	10	0%
44 Liquor law	0	0	1	0	4	0	2	0	2	0	0	0	1	0	10	0%
45 Lost property	1	3	2	0	0	0	0	0	3	1	0	0	0	0	10	0%
Traffic	1	3	2	0	0	0	0	0	3	1	0	0	0	0	10	0%
46 Arrest/Citation	0	0	0	1	1	0	1	0	3	0	0	0	1	2	9	0%
47 Graffiti	3	0	3	0	0	0	0	0	1	0	0	0	1	1	9	0%
48 Robbery	0	1	0	1	5	0	1	0	0	0	0	0	0	0	8	0%
49 Stall/Hazard Vehicle	0	1	0	0	2	0	1	0	3	0	0	0	0	1	8	0%
50 Traffic Incident	1	0	2	0	1	0	1	0	2	0	0	0	0	0	7	0%
51 Runaway/CXL	0	1	0	0	0	0	1	0	1	1	0	0	2	0	6	0%
52 Drugs/Narcotics	0	0	0	1	2	0	0	0	2	0	0	0	0	1	6	0%
53 Runaway	1	0	1	1	1	0	0	0	2	0	0	0	0	0	6	0%
Special Assignment	0	1	0	0	1	0	0	0	2	0	0	0	0	0	6	0%
54 DUI	0	1	0	0	1	0	0	0	1	2	0	0	0	0	5	0%
55 Non-family argument	1	1	1	0	0	0	0	0	2	0	0	0	0	0	5	0%

	Hau'ula	Kaliaka	Keaau	Kokololio	Kualoa	Luahualei	Nanakuli	Waimanalo Bay	Waimanalo Beach	Bellows	Ho'omaluhia	Kalaheo	Maui	Swanzy	Total	%
57	2	0	3	0	0	0	0	0	0	0	0	0	0	0	5	0%
58	2	0	0	0	1	0	0	0	0	0	0	0	0	1	4	0%
59	0	0	2	0	0	0	0	0	0	0	0	0	1	0	3	0%
60	0	1	0	0	0	0	0	0	0	0	0	0	1	1	3	0%
61	0	1	1	0	0	0	0	0	1	0	0	0	0	0	3	0%
62	0	0	2	0	0	0	1	0	0	0	0	0	0	0	3	0%
63	0	0	1	0	0	0	0	0	1	0	0	0	1	0	3	0%
64	0	0	0	0	3	0	0	0	0	0	0	0	0	0	3	0%
65	0	0	0	0	2	0	0	0	0	0	0	0	0	0	2	0%
66	0	0	1	1	0	0	0	0	0	0	0	0	0	0	2	0%
67	0	0	0	0	1	0	0	0	0	0	0	0	1	0	2	0%
68	0	0	0	1	0	0	0	0	0	0	0	0	1	0	2	0%
69	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2	0%
70	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2	0%
71	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0%
72	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0%
73	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0%
74	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0%
75	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0%
76	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0%
77	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0%
78	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0%
Total	504	301	1692	212	432	2	493	2	840	363	1	1	668	141	5652	

Source: Honolulu Police Department

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Appendix 3

Exhibit A3.1

City Document and Record Tracking (DART) Complaints and Comments Related to Camping

Complaint/Comment	Bellows	Waimanalo Beach	Waimanalo Bay	Kualoa	Swanzy	Hauula	Kokololio	Kaiaka	Ho'omaluhia	Kalaeloa	Nanakuli	Mali	Lualualei	Keaau	Total
Illegal camping		8				6		2		1	23	22	4	8	74
Maintenance of grounds/greenery		6	1	1				5	1		2	1		6	23
Bathroom (inoperable fixtures)		4	1	1	2	1		4		2	3	1		4	23
Misc. Question	1	1			2	2	1	2	3		2	3		4	21
Permit Concern	2	1	1				1	1		1	4	5		1	17
Infrastructure (Fencing, sidewalks, etc)		6				3	1				5	1			16
Trash	1	3	1					1	1			1	1	6	14
Bathroom (cleaning)	2	7	1	1							1	1		1	14
General Maintenance & Cleaning		6									4	1	1	1	13
Lights		6	1		1										9
Environmental concerns				2				5	1						8
Maintenance Worker/Park keeper		6						1							7
Contract requests/updates		1									3		2		6
Noise	1	1					3					1			6
Injury	3	3													6
Problem w/security		2		1				1			1			1	6
Sewage		2	1	2											5
Praise for DPR worker		3						2							5
Harassment		5													5
Dogs				1				3						1	5
Alcohol		1				1				1	1				4
Driving on Beach/Lawn											2	1	1		4
Map of sites		4													4
Drugs		2												1	3
General issues/Not Specific						1		1	1						4
Sprinklers								1			1	1	1		3
Theft		3													3
Showers (left on)		1											1		2
Locked gate		2													2
Swimming Pool								2							2
Site locations & proximity	1					1									2
Crime		1												1	2
Drainage		1													1
Lifeguard	1														1
Signage		1													1
Number of Sites										1					1
Request for resident park employee		1													1
Prostitution						1									1
Dog Park request								2							2
TOTAL	12	88	7	9	7	16	6	32	7	6	62	39	11	36	327

Source: Office of the City Auditor analysis

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Appendix 4

Exhibit A4.1

Photos of Park Camping Facilities in Need of Correction or Rules Enforcement



Inoperable, vandalized urinal at Bellows Beach Park



Missing shower tiles and mold at Kalaeloa Beach Park



Illegal dumping of hot coals at Kalaeloa Beach Park



Poor drainage at Kea'au Beach Park



Standing water at Kea'au Beach Park



Broken bathroom stall door at Kokololio Beach Park



Termite-eaten ceiling at Kualoa Regional Park



Condemned comfort station is still accessible and used at Kualoa Regional Park



Lack of toilet tissue at Lualualei Beach Park



Trash, including beer bottles, piled up at Nanakuli Beach Park



This drainage way diverts runoff from the parking lot directly into the ocean at Swanzy Beach Park



Personal belongings line Kalaniana'ole Highway right outside Waimanalo Beach Park



A dog has broken free from its leash and runs around Waimanalo Beach Park



Lack of toilet tissue at Waimanalo Bay Beach Park



Numerous cracks can be found in restroom walls at Waimanalo Bay Beach Park

Source: Office of the City Auditor photos

Appendix 5

Exhibit A5.1 Camping Permits Issued

FY 2008 Camping Permits Issued (July 1, 2007 to June 30, 2008)

Location	Parks Permit Office (FMB)	Kapolei Satellite	Wahiawa Satellite	Ala Moana Satellite	Pearlridge Satellite	Hawai'i Kai Satellite	Windward City Satellite	Fort Street Satellite	Kailua Satellite	Kalihi-Kapalama Satellite	Wai'anae Satellite	Ho'omaluhia*	Total
Bellows Field Beach Park	277	175	103	247	84	304	166	185	487	270	27	0	2,325
Hau'ula Beach Park	86	30	61	42	11	19	320	21	85	37	8	0	720
Kaiaika Bay Beach Park	85	10	187	27	6	12	3	7	4	16	1	0	358
Kalaeloa Beach Park	42	292	41	21	56	20	11	14	14	93	47	0	651
Kea'au Beach Park	63	71	36	117	28	10	17	24	19	53	569	0	1,007
Kokololo Beach Park	26	14	28	26	4	9	42	20	38	52	1	0	260
Kualoa "A" Regional Park	15	19	17	21	19	4	56	27	58	22	4	0	262
Kualoa "B" Regional Park	95	43	17	43	14	15	173	164	91	68	3	0	726
Luualuie Beach Park #1	8	0	4	4	2	0	3	1	2	9	28	0	61
Maiji Beach Park	5	43	4	14	10	0	1	15	6	22	414	0	534
Nanakuli Beach Park	35	201	12	20	11	0	8	12	10	10	190	0	509
Swanzy Beach Park	18	24	21	59	27	15	104	24	39	68	2	0	401
Waimanalo Bay Beach Park	105	35	33	41	4	53	14	22	149	55	3	0	514
Waimanalo Beach Park	76	50	18	137	25	50	66	60	407	70	11	0	970
Ho'omaluhia Botanical Gardens*	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	936	1,007	582	819	301	511	984	596	1,409	845	1,308	0	9,298

* In FY 2008, Ho'omaluhia Botanical Garden did not track the number of camping permits issued

FY 2009 Camping Permits Issued (July 1, 2008 to June 30, 2009)

Location	Parks Permit Office (FMB)	Kapolei Satellite	Wahiawa Satellite	Ala Moana Satellite	Pearlridge Satellite	Hawai'i Kai Satellite	Windward City Satellite	Fort Street Satellite	Kailua Satellite	Kalihi-Kapalama Satellite	Wai'anae Satellite	Ho'omaluhia	Total
Bellows Field Beach Park	279	175	100	304	120	255	60	162	503	257	23	0	2,238
Hau'ula Beach Park	115	26	54	208	8	10	66	64	112	49	10	0	722
Kaiaka Bay Beach Park	16	7	321	4	3	6	0	3	1	2	1	0	364
Kalaeloa Beach Park	48	395	40	25	13	12	2	20	8	77	36	0	676
Ke'au Beach Park	62	106	19	153	27	5	23	55	17	47	681	0	1,195
Kokololo Beach Park	24	15	44	33	4	10	16	25	45	33	5	0	254
Kualoa "A" Regional Park	18	22	20	49	17	10	11	9	65	28	5	0	254
Kualoa "B" Regional Park	151	37	44	71	6	16	67	97	175	58	5	0	727
Lualualei Beach Park #1	3	6	0	1	1	0	4	2	0	2	29	0	48
Mali Beach Park	18	48	11	6	10	1	3	9	5	15	441	0	567
Nanakuli Beach Park	29	187	15	29	10	2	0	7	8	23	217	0	527
Swanzy Beach Park	20	36	17	83	21	15	36	44	88	54	9	0	423
Waimanalo Bay Beach Park	100	24	15	41	7	85	4	36	147	40	5	0	504
Waimanalo Beach Park	77	54	17	149	22	68	16	58	414	62	44	0	981
Ho'omaluhia Botanical Gardens	0	0	0	0	0	0	0	0	0	0	0	492	0
TOTAL	960	1,138	717	1,156	269	495	308	591	1,588	747	1,511	492	9,972

FY 2010 Camping Permits Issued (July 1, 2009 to June 30, 2010)

Location	Parks Permit Office (FMB)	Kapolei Satellite	Wahiawa Satellite	Ala Moana Satellite	Pearlridge Satellite	Hawai'i Kai Satellite	Windward City Satellite	Fort Street Satellite	Kailua Satellite	Kalihi-Kapalama Satellite	Waianae Satellite	Ho'omaluhia	Total
Bellows Field Beach Park	400	237	128	300	126	174	289	165	308	277	30	0	2,434
Hau'ula Beach Park	93	68	48	133	1	7	279	60	27	25	14	0	755
Kaiaka Bay Beach Park	28	15	280	13	1	5	7	4	2	7	2	0	364
Kalaeloa Beach Park	34	416	67	7	27	21	8	12	2	55	21	0	670
Kea'au Beach Park	81	273	28	104	24	5	41	15	29	21	416	0	1,037
Kokololo Beach Park	37	13	38	24	4	7	72	22	9	26	6	0	258
Kualoa "A" Regional Park	39	21	21	23	4	8	62	10	33	30	21	0	272
Kualoa "B" Regional Park	123	36	39	35	9	19	294	32	84	40	11	0	722
Luualaei Beach Park	7	39	2	3	2	0	0	0	0	2	35	0	90
Maui Beach Park	10	137	9	4	9	2	3	4	5	14	409	0	606
Nanakuli Beach Park	42	228	22	17	11	0	12	6	3	19	202	0	562
Swanzy Beach Park	28	33	36	49	16	1	132	33	59	42	15	0	444
Waimanalo Bay Beach Park	87	22	19	48	9	39	90	51	101	22	1	0	489
Waimanalo Beach Park	94	50	15	112	16	53	147	64	392	34	10	0	987
Ho'omaluhia Botanical Gardens	0	0	0	0	0	0	0	0	0	0	0	546	546
TOTAL	1,103	1,588	752	872	259	341	1,436	478	1,054	614	1,193	546	10,236

FY 2011 Camping Permits Issued (July 1, 2010 to June 30, 2011)

Location	Ho'omaluhia Botanical Gardens	Kailua Satellite	Parks Permit Office (FMB)	Kapolei Satellite	Wahiawa Satellite	Total
Bellows Field Beach Park	0	3	1,357	520	178	2,058
Hau'ula Beach Park	0	0	442	58	118	618
Kaiaka Bay Beach Park	0	0	65	29	266	360
Kalaeloa Beach Park	0	0	78	511	51	640
Kea'au Beach Park	0	0	148	380	44	572
Kokololio Beach Park	0	0	142	48	68	258
Kualoa "A" Regional Park	0	0	160	53	28	241
Kualoa "B" Regional Park	0	0	417	190	113	720
Lualualei Beach Park #1	0	0	13	62	15	90
Maili Beach Park	0	0	37	511	18	566
Nanakuli Beach Park	0	0	25	470	24	519
Swanzy Beach Park	0	0	198	106	45	349
Waimanalo Bay Beach Park	0	0	421	54	45	520
Waimanalo Beach Park	0	0	780	74	60	914
Ho'omaluhia Botanical Gardens	502	0	0	0	0	502
TOTAL	502	3	4,283	3,066	1,073	8,927

Source: Department of Parks and Recreation

Appendix 6

Exhibit A6.1 Inconsistent Signage Used at City Parks That Offer Camping



Bellows Beach Park

No Signage

Hau`ula Beach Park

No Signage

Ho`omaluhia Botanical Garden



Kaiaka Beach Park



Kalaeloa Beach Park



Kea'au Beach Park



Kokololio Beach Park



Kualoa Regional Park



Lualualei Beach Park



Maili Beach Park



Nanakuli Beach Park

No Signage

Swanzy Beach Park



Waimanalo Bay Beach Park



Waimanalo Beach Park

Source: Office of the City Auditor photos