ENVIRONMENTAL IMPACT STATEMENT
FOR
SITE SELECTION REPORT
HILO REHABILITATION COMPLEX
HILO, HAWAII

PREPARED BY
PLANNING BRANCH

DIVISION OF PUBLIC WORKS
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
NOVEMBER 1974
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I. PROJECT DESCRIPTION AND NEED

New facilities are proposed for a rehabilitation complex to serve the mentally, physically and emotion-ally handicapped residing in the Hilo, Puna, and Kau Districts.

The five-acre area proposed for the new facilities is located on Waianuenue Avenue across from the Hilo Hospital (TMK 2-3-32:portion 01). See Appendix A for location and vicinity maps. The land is owned by the State of Hawaii and is under the control of the Department of Land and Natural Resources. It is presently being subleased to Mauna Kea Sugar Company for the growing of sugar cane. Further discussions on the sublease are included in Section II of the EIS.

Improvements proposed for this project are as follows:

1. Sheltered Workshop

2. Training and Day Activity Center

A study will be conducted in the future to determine the feasibility and merits of including in the center other nonprofit organizations providing human development services.

Rehabilitation services for the mentally, physically, and emotionally handicapped individuals are provided by the Rainbow Crafts and Hilo Training and Day Activity Center. These organizations are nonprofit eleemosynary agencies sponsored by the Big Island Association to Help Retarded Children, Hilo Division.

The above agencies are presently housed in separate wooden structures in the annex of the former Hilo Memorial Hospital. The buildings are old, dilapidated and termite eaten. Some of the deficiencies of the buildings are
leaky roof, poor lighting and ventilation, no hot water. Inadequate toilet facilities, and poor accessibility features to accommodate handicapped individuals.

The new facilities are proposed for the implementation of present and proposed programs that would offer the handicapped a comprehensive rehabilitation program. The type of services to be provided are those offered under the following programs:

1. Training for the mentally handicapped from 5 to 20 years of age.

2. Training for the profoundly mentally handicapped.

3. Training for the emotionally handicapped.

4. Day activities.

5. Sheltered workshop.

II. IMPACT OF THE PROJECT

A. Social

1. Benefits

Benefits of this project will be increased opportunities to the handicapped for a continuum of care and training so that they may realize their highest potential, increased assistance and guidance to families with handicapped children, and the development of the handicapped in becoming a contributing member to society.

The sheltered workshop will provide employment for the handicapped who may not be able to compete for employment in the open market.

The public will benefit from this project by having the handicapped become contributing members to society or by having them trained in personal care so that the homebound parent may be released and also contribute to society.
2. **Public Safety**

The proposed site for the complex is located outside of the tsunami inundation zone as established by the Hawaii Institute of Geophysics, University of Hawaii. The site is also located outside of the flood hazard zones as delineated by the Department of Land and Natural Resources and the United States Army Corps of Engineers.

The site is serviced by Waianuenue Avenue which is a secondary arterial running up to the site selection area. No blind curves or sight obstruction are anticipated that will create a hazardous access to the site.

Public safety and industrial safety will be of prime consideration in the design and construction of the complex. Accessibility features for the handicapped such as ramps, railings, parking spaces, toilet, and other miscellaneous features will be included in the design of the complex.

3. **Neighborhood Character**

The proposed complex site is located within an area designated for urban use by the State Land Use Commission. The County of Hawaii zoning for the site is residential (RS-10). Schools for the handicapped are permitted within a residential district provided a minimum land area of one acre is provided.

The site is located on the outskirts of the residential community. The Hilo Hospital is across the street from the site. This site is compatible with the serenity and quietness demanded of a good rehabilitation program.

Also, the County of Hawaii is planning a wilderness park adjacent to the site. This will assure additional privacy needed in perpetuity.

4. **Religious Institutions**

The proposed site is located approximately
1,500 feet from First United Protestant Church on Waianuenue Avenue. It is far enough away from the church so as not to disturb its activities.

5. **State Facilities**

The Hilo Hospital Complex is located within walking distance of the project site.

B. **Economics**

1. **Economic Activity**

   The land is owned by the State of Hawaii and is under the jurisdiction of the Department of Land and Natural Resources. The land is presently being leased to Mauna Kea Sugar Company, who in turn is subleasing to private sugar cane growers. The Hilo Coast Processing Company, the parent company of independent Hilo sugar growers (including Maunakea Sugar Co.), has experienced difficulty in harvesting sugar cane in this area and has discouraged growers from continuing to use the land for sugar. (See Appendix C)

2. **Employment**

   The proposed complex will provide employment initially during the construction phase. It is not expected to generate any additional long term employment in the area since this is a replacement of an existing facility.

3. **Removing Land from Tax Base**

   Land will be removed from the tax base.

4. **Displacement of Families and Businesses**

   No families will be displaced by this project. The Hilo Coast Processing Company is encouraging the growers to return any land the State needs for its use.
5. Project Cost

The tentative project construction schedule and estimated cost are as follows:

The land, as mentioned earlier, belongs to the State of Hawaii and is being subleased to private cane growers. Compensation to the cane growers for crop loss will be determined by the Department of Land and Natural Resources.

Phase I of the sheltered workshop construction is scheduled to be completed in the summer of 1976. There is $550,000 in funds available for Phase I.

Subsequent phases of the sheltered workshop will be scheduled as funds become available. Phase II, the Training and Day Activity Center, will cost $600,000. Phase III, the Joint-Use Facilities, will cost $252,000. The total estimated cost of the rehabilitation complex is $1,402,000.

6. Maintenance and Operating Features

The design of the facility will take into account the high rainfall in the Hilo area. Material which has proven its durability to the Hilo weather will be used. Landscaping will be incorporated in the design to provide minimum maintenance costs.

The facility will initially be operated and maintained by the Rainbow Crafts. In the future the Hilo Training and Day Activity Center will have a building on this site which will be operated and maintained by them.

C. Environmental

1. Aesthetics

The recognition of aesthetics will be con-
stantly considered during the design of the center. The complex will be master planned to fit into the area. Landscaped buffer areas will be provided as required to minimize disturbance to its neighbors, and insure privacy for the facility.

2. **Fire Protection**

The complex will not disrupt any fire protection facilities for the area. Fire protection will be considered in the design of the complex.

3. **Utilities**

Water, sewer, electrical, and telephone services are readily available to the site.

Temporary disruption of utility service may be required for connection purposes and will be held to a minimum.

4. **Conservation**

As mentioned earlier the site is covered with sugar cane, which is being phased out. The development of the site is not expected to affect any endangered species of flora or fauna. Landscaping will be provided to offset the reduction of existing vegetation.

"In a representative soil profile, the surface layer is dark brown silty clay loam about 12 inches thick. The subsoil is about 48 inches thick and consists of reddish, gray-brown silty clay loam. Included are small areas of shallow soils over Pahoehe lava bedrock. Permeability is rapid, runoff is slow, and the erosion hazard is slight." 1/

1/ **Soil Survey of Island of Hawaii, State of Hawaii, United States Department of Agriculture, Soil Conservation Service, December 1973.**
5. **Natural or Historic Landmarks**

The historical staff of the Division of Parks, Department of Land and Natural Resources, has reviewed the site of the proposed complex and finds no known natural or historical landmarks. (See Appendix C)

6. **Noise, Air, and Water Pollution**

Development of the site, which is level, will require very little mass grading, excavating, cutting, and filling. However, some dust, noise, and silting will be inevitable during the construction phases. These items will be controlled by implementation of pollution control measures. See Appendix B for specification on environmental protection.

The sewage created by the complex will be handled by a 16" line on Waianuenue Avenue.

Refuse created by the complex will be taken to disposal sites designated by the County of Hawaii.

Surface runoff from the site will be directed to existing drainage ditches. Also, grass planting will be included during construction to further reduce any immediate or long term erosion.

Dust emanating from the carpentry shops will be controlled by the use of a dust collector. No other type of emissions into the air is anticipated.

7. **Traffic Condition**

The one-way street makai condition during the morning peak traffic hour (7:15 a.m. to 8:00 a.m.) occurs at the lower portion of Waianuenue Avenue between Kaumana Drive and Kamehameha Avenue. During this period, mauka bound traffic use Haili Street. The rehabilitation complex site, being far enough above the one-way zone, should not experience access prob-
lems, even if an alternate mauka route is used. (See attached map) The Hawaii County Planning Department has no objections in this regard.

III. ADVERSE EFFECTS WHICH CANNOT BE AVOIDED

A. The incremental development of the complex will inevitably create noise, air, and water pollution. However, these undesirable effects will be minimized by strict enforcement of pollution control measures.

B. The project will result in additional drainage run-off, which will be diverted to existing ditch.

C. Additional traffic will be generated as a result of the complex. However, with a drop-off area provided within the site, no traffic congestion is anticipated. Private bus transportation for the clientele will also help reduce localized vehicular traffic.

IV. ALTERNATIVES

Of the 34 State-owned parcels considered, Sites 7 and 8 were selected by the Department of Accounting and General Services as the best possible sites. These two alternative sites were evaluated against site evaluation criteria developed for comparison purposes. Site 7 was determined to best meet the site evaluation criteria and the needs of the user and is therefore recommended for the rehabilitation complex. Further discussions on the analysis of the various alternatives and the recommendation of Site 7 are presented in Appendix D.

V. RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The proposed complex will be in consonance with the State's goal of promoting a high level of health and welfare for all citizens. This project will also stimulate cooperation between the State and social agencies in providing medical care and training to the mentally, emotionally, and physically handicapped.

Depletion of environmental resources on a short or long term basis will be minimal. The major commitment
of resources is the sugar cane growing on the land. However, since the private growers are phasing out their fields, and only a portion of the parcel will be developed at first, the loss in revenues will be minimal and gradual.

VI. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The project would commit labor and material resources which are irretrievable. However, the proposed facilities can be used for other purposes besides its planned use.

VII. SOCIAL COSTS AND BENEFITS OF PROJECT

A discussion of the costs and benefits of the project in narrative form with no attempt to quantify the costs or benefits will be pursued.

The cost of the project was mentioned in Section II. The actual land acquisition and construction costs can be identified with reasonable accuracy.

The benefits of the project can be categorized into tangible and intangible benefits. The tangible benefits are:

A. New facilities will reduce building maintenance cost. A comparison of yearly maintenance costs for different alternatives are as follows:


2. Construct new buildings on new site - $48,100/yr.

B. New facilities would eliminate deficiencies existing in the present facilities such as cramped quarters, poor lighting, ventilation, run-down, etc.

C. Centralization of the complex would reduce transportation costs. Presently, the Sheltered Workshop and Child Training Center are located in the same facility. This same arrangement on the new site would eliminate the transporting of goods and clientele between facilities. Also, the joint-use of certain
areas such as kitchen and dining, and a common clerical staff, would further reduce costs.

The intangible benefits of the project are as follows:

A. New and modern facilities would encourage the handicapped and families of the handicapped to utilize the services available.

B. The complex will provide better working and training conditions and thus provide an environment more conducive to rehabilitation.

The major benefits derived from this project can be applied as intangible benefits which results from providing a continuum and array of services to the handicapped.

Value judgment of benefits must necessarily be subjective because of the difficulty in quantifying intangible benefits. For this reason and as stated earlier, no attempt to quantify the benefits was made. However, it is felt that the benefits exceed the cost of the project.

It should also be pointed out that the handicapped are citizens and are entitled to the rights, aid, privileges, and protection provided by our society.

VIII. COMMENTS ON DRAFT EIS

Comments were received from various agencies regarding the draft environmental impact statement. These comments and responses by the Department of Accounting and General Services to the commenting agency can be found in Appendix E.
APPENDIX A

Location and Vicinity Maps
APPENDIX B

Specifications for Environmental Protection
DIVISION 1 - GENERAL

SECTION 16 - ENVIRONMENTAL PROTECTION

The Contractor shall comply with the following requirements for pollution control in performing all construction activities:

1. RUBBISH DISPOSAL

   A. No burning of debris and/or waste materials shall be permitted on the project site.

   B. No burying of debris and/or waste material except for materials which are specifically indicated elsewhere in these specifications as suitable for backfill shall be permitted on the project site.

   C. All unusable debris and waste materials shall be hauled away to an appropriate off-site dump area. During loading operations, debris and waste materials shall be watered down to allay dust.

   D. No dry sweeping shall be permitted in cleaning rubbish and fines which can become airborne from floors or other paved areas. Vacuuming, wet mopping or wet or damp sweeping is acceptable.

   E. Enclosed chutes and/or containers shall be used for conveying debris from above to ground floor level.

   F. Cleanup shall include the collection of all waste paper and wrapping materials, cans, bottles, construction waste materials and other objectionable materials, and removal as required. Frequency of cleanup shall coincide with rubbish producing events.

2. DUST

   A. The State will pay for all dust control sprinkling for a period of (INSERT FIGURE) consecutive working days * from the date of the Notice to Proceed. All cost for dust control measures after this period shall become the responsibility of the Contractor.

   B. It shall be the Contractor's responsibility to control dust to an acceptable level at all times, including non-working

* Architect: If the project is such that grading must be done in phases, consult with State for proper phasing and appropriate wording.
hours, weekends and holidays by sprinkling water.

C. Before the termination of the period stipulated in Paragraph 2A above, work done by the Contractor in complying with this requirement shall be paid for in accordance with Subsection 9.4(b) "Force Account Work" of the General Requirements and Covenants. The Contractor shall be responsible for all damages in accordance with Section 7.7 "Responsibility of Damage Claims" of the General Requirements and Covenants. The intent of this provision is only to provide an equitable method of payment and it is not intended to relieve the contractor from damage claims resulting therefrom.

D. After the termination of the period stipulated in Paragraph 2A above, all sprinkling required for dust control, whether voluntarily done by the Contractor or ordered by the Engineer, shall be paid for by the Contractor.

E. Sprinkling or watering work which will not be covered for payment but shall be the responsibility of the Contractor and be a part of the lump-sum bid:

- Areas planted with ground cover and/or grass.
- Areas outside the Contract Zone limits, such as adjacent roads and streets.

F. Payment for sprinkling done in accordance with the above shall be made by change order at the end of the grading period stipulated in Paragraph 2A.

3. NOISE

A. All internal combustion engine-powered equipment shall have mufflers to minimize noise and shall be properly maintained to reduce noise to acceptable levels.

B. No blasting and use of explosives will be permitted without prior approval of the Engineer.

C. Pile driving operations shall be confined to the period between 8:00 a.m. and 5:30 p.m., Monday through Friday. Pile driving will not be permitted on weekends and legal State and Federal holidays.

D. Starting up of non-highway vehicular equipment shall not be done prior to 6:45 a.m. without prior approval of the Engineer.

Revised 10/73

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4. **EROSION**

During interim grading operations the grade shall be maintained so as to preclude any damages to adjoining property from water and eroding soil. Temporary berms, cut-off ditches, and other provisions which may be required because of the Contractor's method of operation shall be installed at no cost to the State. Drainage outlets and silting basins shall be constructed and maintained as shown on the plans to minimize erosion and pollution of waterways during construction.

5. **OTHERS**

A. Wherever trucks and/or vehicles leave the site and enter surrounding paved streets, the Contractor shall prevent any material from being carried onto the pavement. Waste water shall not be discharged into existing streams, waterways, or drainage systems such as gutters and catch basins unless treated to comply with Department of Health water pollution regulations.

B. Trucks hauling debris shall be covered as required by PUC Regulation. Trucks hauling fine materials shall be covered.

C. No dumping of waste concrete will be permitted at the job site unless otherwise permitted in the Special Provisions.

D. Except for rinsing of the hopper and delivery chute, and for wheel washing where required, concrete trucks shall not be cleaned on the job site.

E. Except in an emergency, such as a mechanical breakdown, all vehicle fueling and maintenance shall be done in a designated area. A temporary berm shall be constructed around the area when runoff can cause problems.

F. Spray painting will not be allowed unless done by the "airless spray" process.

6. **SUSPENSION OF WORK**

Violation of any of the above requirements or any other pollution control requirements which may be specified in the Technical Specifications herein shall be cause for suspension of the work creating such violation. No additional compensation shall be due the Contractor for remedial measures to correct the offense. Also, no extension of time will be granted for delays caused by such suspensions.

Revised 10/73
If no corrective action is taken by the Contractor within 72 hours after a suspension is ordered by the Engineer, the State reserves the right to take whatever action is necessary to correct the situation and to deduct all costs incurred by the State in taking such action from monies due the Contractor.

The Engineer may also suspend any operations which he feels are creating pollution problems although they may not be in violation of the above mentioned requirements. In this instance, the work shall be done by force account as described in Subsection 4.2(e) "FORCE ACCOUNT WORK" of the General Requirements and Covenants and paid for in accordance with Subsection 9.4(b) "FORCE ACCOUNT WORK" therein. The count of elapsed working days to be charged against the contract in this situation shall be computed in accordance with Subsection 8.8(d) "CONTRACT TIME" of the General Requirements and Covenants.

NOTE TO ARCHITECT: Notify the Public Works Engineer in writing at or before the Pre-Final submittal of any proposed changes to the above requirements.
SECTION 2C - GRASS PLANTING

GENERAL CONDITIONS:

As specified in Section 1A.

WORK SPECIFIED IN THIS SECTION:

The work to be performed under this section shall include furnishing all labor, materials, equipment and tools for grass planting in areas indicated on the drawings and as specified herein. Grass shall also be planted in the following areas:

(1) Existing grassed areas that are damaged by construction operations and areas dug up for utility trenches.

(2) Areas occupied by existing structures that are to be demolished, removed and topsoiled.

(3) Areas within "Contract Zone Limits" that are graded and covered with top soil except areas designated for other plants.

(4) All other areas within "Contract Zone Limits" that are indicated on the plans to be graded, such as slopes of banks, etc.

(Note to Architect: For clarity, indicate on site plan all areas to be grassed so that there is no doubt as to the extent of new grassing. If necessary, draw a separate grassing plan. Do not use the term "Lawn Area".)

WORK SPECIFIED IN OTHER SECTIONS:

Top soil for general finish grading and its installation are specified under EARTHWORK SECTION. However, screened top soil for repair work as specified herein shall be furnished and installed under this section.

COMMENCEMENT REQUIREMENTS:

Grass planting operations shall be started within 36 hours after top soil has been placed and shall be continued through to completion. There shall be no deviation from this requirement without the express approval of the Engineer.

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MAINTENANCE:

(1) **General:** The Contractor shall be responsible for the proper care of the grassed areas. Maintenance includes watering, weeding, mowing, repairing, regrassing and protection, and is required until the entire project is accepted, but in any event for a period not less than ***** days after planting of grass.

(2) **Watering:** After planting of seeds or grass sprigs the ground shall be kept continuously moist until a healthy growth is established. Thereafter, the grass shall be thoroughly watered once a day until grassing work is accepted. Watering shall be done in a manner that will prevent erosion due to the application of excessive quantities of water, and the watering equipment shall be of a type that will prevent damage to the finished surface.

(3) **Weeding:** Weeds shall be uprooted and removed completely and in no case shall they be allowed to grow and propagate more seeds. Large holes caused by weeding shall be filled with screened top soil and raked level.

(4) **Mowing:** Grass shall be mowed with approved moving equipment to a height of 1-1/2" whenever the average height of grass becomes 3".

(5) **Repairing and regrassing:** When any portion of the surface becomes gullied or otherwise damaged and grass has failed to grow, such areas shall be repaired with screened top soil and replanted with grass.

(6) **Protection:** The grassed areas shall be protected against traffic so that the grass establishes a healthy growth. Grassed areas damaged by traffic shall be replanted.
APPENDIX C

Correspondence

Letter from Hilo Coast Processing Company
dated September 5, 1973

Letter from Hilo Association to Help Retarded Children
dated March 12, 1974

Letter from Hawaii County Planning Department
dated April 18, 1974

Letter from Division of State Parks, Department of
Land and Natural Resources, dated July 10, 1974
September 5, 1973

Mr. T. Tominaga
Chief, Planning Branch
Division of Public Works
P. O. Box 119
Honolulu, Hawaii 96810

Dear Mr. Tominaga:

Subject: Rehabilitation Complex, Hilo

I have had our Growers Coordinator check on the parcels referred to in your recent letter on the subject. The area in question is sub-leased to Mr. Jihizo Ota, Lot No. G923, 17.43 acres, planted February 11, 1973, to a new cane variety 59-3775; anticipated harvest date January, 1975. Mr. Ota’s address is listed as 6 Pokole Way, Hilo, Hawaii.

Since Mr. Ota has planted a new variety this year, he would anticipate harvesting the plant crop in January, 1975, and a minimum of three successive ratoon crops in years 1977, 1979 and 1981. Some growers will obtain additional ratoons from their plant fields; however, the general experience is a plant and three ratoons.

You will note from the enclosed sketch that there is a private parcel within the proposed area owned by Emily De Cambra and Mary De Cambra Morote, Tax Key 2-3-32-3.

This is a difficult area for us to harvest due to the urban development and the hospital located in the area. We are hopeful that the State will find other uses for this parcel and the adjoining parcels adjacent to the Hilo Hospital. These parcels are located along Waianuenue Avenue.

Very truly yours,

William Kenda
President

WK:sn
Encl.
Mr. Ernest Shima, Head Engineer
Department of Accounting & General Services
465 South King Street
Honolulu, Hawaii 96813

Dear Mr. Shima:

The Board of Directors of the Hilo Association to help Retarded Children have investigated site #8, your latest proposal for a building site for Rainbow Crafts.

We are again requesting site #7 for the Rainbow Crafts building, our observations are:

1. The location of site #8 between University of Hawaii and the proposed Hilo II High School would require complete fencing for the protection and welfare of our clients.

2. The road frontage is a lengthy curve which is a hazard for our clients and presents a problem in the placement of the building.

3. Kawili Street will present a greater traffic hazard than site #10 because of future school development.

4. The shape of the 5 acres will present a problem in future expansion.

5. Site #8 was not mentioned in the original draft.
Your report shows that site #7 would be less costly to the State and is available being one of 3 sites evaluated in your September report.

May we point out that at this time we are approximately 6 months behind schedule according to your site selection report of Sept. 1973.

Sincerely yours,

[Signature]

Mr. Lawrence Capellas,
President

cc: KeNam Kim
Andrew Chang
Kazu Higaki

E-27
April 18, 1974

Mr. Kenam Kim, Comptroller
Department of Accounting and
General Services
P. O. Box 119
Honolulu, Hawaii 96810

Attention: Rikio Nishioka

Thank you for your letter of January 25, 1974, relating to the proposed site for the Hilo Rehabilitation Complex. We would like to initially apologize for this delinquent response, but other equally important tasks precluded an earlier reply. Moreover, we were soliciting the reactions of the Hilo Association to Help Retarded Citizens (HAHRC) with the hope of incorporating their concerns in this letter.

After a careful review of your alternatives, we still maintain that Site No. 8 is undesirable. The problems of creating an education/institutional ghetto still prevail; additionally, a conglomeration of public facilities would tend to exacerbate the traffic problem.

That site has also been deemed absolutely unacceptable by the HAHRC. They noted to us at an April 16, 1974 meeting that serenity and quietness are prime considerations. A good rehabilitation program demands serenity, as the students require a high level of concentration to be able to effectively perform certain tasks. A congested and/or active area would only serve to disrupt the students' train of thought.

Using serenity and quietness as the major criteria, the HAHRC Board of Directors at its April 16 meeting voted to recommend Site No. 7 as the site for the subject complex.
Mr. Kenam Kim  
Page 2  
April 18, 1974

After a re-evaluation of the various alternatives and discussions with the HAHRC, we concur with the HAHRC's recommendation. Our initial recommendation for the Mohouli site was weighed against the operational requirements of such a complex. After learning more of the clients' needs, we are now convinced that the atmosphere afforded by Site No. 7 would be ideal. The soon-to-be developed County Kaumana Springs Wilderness Park will assure the right amount of privacy needed in perpetuity.

We also observed that there were other favorable factors. Based upon your site analysis and cost/benefit table, Site No. 7 has the lowest site development and building construction costs among the four sites evaluated. Then, too, the expansion prospects of Site No. 7 are great. Should the facility requirement and/or concept of the program change, this site would offer the desired level of flexibility.

In view of the foregoing, we would recommend that Site No. 7 be selected for the Hilo Rehabilitation Complex.

Should you have any questions or if we could be of any other service to you, please do not hesitate to contact us.

Raymond H. Suefuji  
Director

SF: mh

cc HAHRC  
Attn: Richard Santos
July 10, 1974

Mr. Rikio Nishioka
State Public Works Engineer
State of Hawaii
Department of Accounting and
General Services
P. O. Box 119
Honolulu, HI  96810

Dear Mr. Nishioka:

Neither the area you have recommended for the Hilo Rehabilitation Complex, as noted in your letter of July 2, 1974 (TMK 2-3-31-1); or the alternative locations
(TMK 2-3-32-1, 2-3-32-3); contain any known historic or archaeological sites.

Very truly yours,

BOARD OF LAND AND NATURAL RESOURCES

[Signature]

SUNAO KIDO
Chairman and Member
APPENDIX D

Analysis and Recommendation
ANALYSIS AND RECOMMENDATION

Analysis

Of the 34 State-owned sites larger than five acres within the site selection area (see attached Figure D-1), it was possible to seriously consider four alternative sites (see attached Figure D-2). These four sites were evaluated against certain criteria pertinent to a desirable site. The results of this evaluation are summarized in Table 1. It should be emphasized here that the items in the evaluation table do not carry the same weight. However, the evaluation table provides an overall reference to the evaluation process and simplifies the site selection. All four alternatives (Sites 4, 7, 8 and 10b) meet the minimum established criteria.

Alternative Site 4 has a slight advantage over Site 7 in terms of criteria. However, Site 4 is estimated to cost approximately $100,000 more to develop and for this reason was eliminated from further consideration.

Alternative Site 8 is equal to Site 10b in terms of criteria and availability. The Department of Land and Natural Resources has indicated a preference for Site 8, as Site 10b may interfere with their plans for future development. Therefore, Site 10b was also eliminated from further consideration.

An analysis of the two remaining alternative sites under consideration, viz. Alternative Sites 7 and 8 reveals the following differences:

1. Alternative Site 8 has more desirable and less undesirable characteristics than Alternative Site 7.

2. As observed in the evaluation table, Alternative Site 8 has no poor characteristics.

3. Alternative Site 8 is located in the vicinity where many eleemosynary, charitable organizations are concentrated. Some of these are the Waiakea Settlement Y.M.C.A., the I.L.W.U., U.S. Army Reserve, a church, a proposed senior citizens housing project and a proposed H.G.E.A. facility.

Should an office for community agencies be built on the site, this location will be compatible with the apparent planning goal of congregating all of the eleemosynary organizations in one area.

4. Alternative Site 8 is in a "drier" area of Hilo than Alternative Site 7.

5. The location of Alternative Site 8 integrates the complex

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Table 1

EVALUATION TABLE*

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<th>Criteria</th>
<th>Alternative Sites</th>
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<tr>
<td></td>
<td>4</td>
<td>7</td>
<td>8</td>
<td>10b</td>
</tr>
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<td>1. Minimum Site Criteria</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>A. Size</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>B. Shape</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>C. Tsunami</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>D. Flood</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>E. Landslide</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>F. Location</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>G. Land Ownership</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>2. General Site Criteria</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>A. Shape of Site</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td>B. Slope of Site</td>
<td>-</td>
<td>+</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>C. Aesthetics of Site</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
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<td>D. Accessibility</td>
<td>+</td>
<td>0</td>
<td>0</td>
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<td>E. Offsite Nuisances</td>
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<td>+</td>
<td>0</td>
<td>+</td>
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<tr>
<td>F. Aircraft Noise</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td>G. Traffic Noise</td>
<td>+</td>
<td>+</td>
<td>0</td>
<td>+</td>
</tr>
<tr>
<td>H. Rainfall</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>I. State Land Use</td>
<td>+</td>
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<tr>
<td>J. Hawaii Zoning Ordinance</td>
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</tr>
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<td>K. Interference with Institutions</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td>L. Displacement</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td>M. Proximity to Residential Community</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>+</td>
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<tr>
<td>N. Proximity to Commercial Community</td>
<td>-</td>
<td>-</td>
<td>+</td>
<td>+</td>
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<tr>
<td>Totals of General Site Criteria</td>
<td>+</td>
<td>9</td>
<td>8</td>
<td>10</td>
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<td></td>
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<tr>
<td></td>
<td>-</td>
<td>3</td>
<td>2</td>
<td>0</td>
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</table>

1. Site Development                    | 217.0            | 150.0 | 175.0 | 223.0 |
2. Building Construction                | 1,285.0          | 1,252.0 | 1,267.01 | 288.0 |
Totals (Thousands of Dollars)           | 1,502.0          | 1,402.0 | 1,442.01 | 511.0 |

*Legend:  

Yes  Site meets minimum criteria  
No   Site does not meet minimum criteria  
+    Indicates an excellent characteristic  
0    Indicates a good characteristic  
-    Indicated a poor characteristic
UNIVERSITY OF HAWAII
Environmental Center

Office of the Director

June 5, 1974

MEMORANDUM

TO: Richard Marland
FROM: Jerry M. Johnson
SUBJECT: Draft EIS for the proposed
Hilo Rehabilitation Complex

I have no comments about this EIS.

[Signature]
Jerry M. Johnson
Acting Director
MEMORANDUM

To: Dr. Richard E. Marland, Interim Director
   Office of Environmental Quality Control

Subject: Environmental Impact Statement for Site Selection Report
         Hilo Rehabilitation Complex, DAGS

The Department of Agriculture has reviewed the draft EIS and has no adverse recommendations. Loss of the area in sugar cane is expected to have no significant effect on future agricultural activities. This problem is noted in the letter (appendix C) from William Kenda, Hilo Coast Processing Company, Inc., dated September 5, 1973.

The Department recommends acceptance of the EIS.

[Signature]
Frederick C. Erskine
Chairman, Board of Agriculture
May 26, 1974

Dr. Richard Marland
Office of Environmental Quality Control
550 Halokouila Street, Room 301
Honolulu, HI 96813

Re: Environmental Impact Statement
Site Selection Report – Hilo Rehabilitation Complex

As requested in your letter of transmittal of May 16, 1974, we reviewed the environmental impact statement for the subject project.

Water for domestic use and fire protection purposes is available from our 16-Inch main along Wanananue Avenue. This project will not have any adverse effects on our water system.

[Signature]
Akira Fujimoto
Manager
WHS

...Water brings progress...
May 22, 1974

Dr. Richard E. Marland  
Office of Environmental Quality Control  
550 Halekauwila St.  
Honolulu, Hawaii  96813

Re: Draft Environmental Impact Statement for  
Site Selection Report - Hilo Rehabilitation Complex  
Hilo, Hawaii

Thank you for the opportunity to review and comment on the subject environmental impact statement. We have reviewed the impact statement. In view of it and our previous communication with the Department of Accounting and General Services on the site selection, we have no further comments or objections to offer.

RAYMOND H. SUEFUJI  
Director

VG:mn
DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 15th AIR BASE WING (PACEF)
APO SAN FRANCISCO 96006

DEEEE

SUBJECT: Draft Environmental Impact Statement

To: Office of Environmental Quality Control
   Office of the Governor
   550 Halekauwila Street
   Tani Office Building, Third Floor
   Honolulu, Hawaii 96813

1. Reference is made to your letter of 16 May 1974, subject as above.

2. This office has no comment to render relative to the draft environmental impact statement for the Hilo Rehabilitation Complex project.

ALLAN M. YAMADA
Defense General Counsel
Dr. Richard Marland  
Interim Director  
Office of Environmental Quality Control  
550 Halekauwila Street  
Honolulu, Hawaii 96813

Dear Dr. Marland:

We have reviewed the draft environmental impact statement for Site Selection, Hilo Rehabilitation Complex, Hilo, Hawaii and the final environmental impact statement for the development of a houselot subdivision on State land at Kealakehe, North Kona, Hawaii. We have no comments on either document. Thank you for the opportunity to review these statements.

Sincerely yours,

[Signature]

ELROY K. C. CHINN  
Acting Chief, Engineering Division
Office of Environmental Quality Control
Office of the Governor
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Gentlemen:

We have reviewed the Draft Environmental Impact Statements for:

✓ a. Site Selection Report, Hilo Rehabilitation Complex

 b. Waipahu Uka Elementary School

We concur on the Draft IES for both projects.

Although we are not directly affected, we feel that both projects should be of great benefit to the community.

Sincerely yours,

CHARLES S. VARNUM
Colonel, CE
Director of Facilities Engineering
June 18, 1974

Dr. Richard E. Marland, Interim Director
Office of Environmental Quality Control
550 Halekauwila St., Room 301
Honolulu, HI 96813

Dear Dr. Marland:

Re: Draft Environmental Impact Statement
    Site Selection Report - Hilo Rehabilitation Complex

We have reviewed the above-mentioned draft as you requested and offer the following comments for consideration by the developers:

The soils on the site are mapped as Hilo Silty Clay Loam, 0-10 percent slope. In a typical profile, the surface layer is dark brown silty clay loam about 12 inches thick. The subsoil which extends to a depth of over 70 inches to unconforming bedrock is dark brown to reddish-brown silty clay loam. The subsoil dehydrates irreversibly into gravel sized aggregates. This soil type has inclusions of shallow soils over pahoehoe lava rock.

Annual rainfall ranges from 120 to 180 inches annually.

Its suitability as a foundation for low buildings may be affected by the following properties: low bearing capacity, high compressibility, low shear strength, and high shrinkage.

The proposed site is located in a heavy rainfall area. This, along with the irreversible aggregation characteristics of the subsoil, could create serious erosion problems and result in sedimentation into Ainako Stream. The stream flows relatively sediment-free at the present time.

Because of some of the previously discussed soil properties, special consideration may need to be given to certain aspects of construction where building foundations are concerned. In addition, conservation practices should be developed on the site during construction to minimize erosion problems.

Thank you for the opportunity to review this draft.

Sincerely,

Francis C. H. Lum
State Conservationist
Mr. Francis C. H. Lum
State Conservationist
Soil Conservation Service
U. S. Department of Agriculture
440 Alexander Young Building
Honolulu, Hawaii  96813

Dear Mr. Lum:

Subject: Draft EIS for Site Selection Report
         Hilo Rehabilitation Complex

This is in response to your letter of June 18, 1974 to the Office of Environmental Quality Control regarding the subject project. Our response is presented immediately after each comment.

1. **Comment:** Because of possible unsuitable subsoil conditions, special consideration may need to be given to certain aspects of construction where building foundations are concerned.

   **Response:** Buildings will be limited to a height of one story wherever feasible. A reputable soils consultant will be retained by the State to assist the structural engineer in his design of the foundation for the complex.

2. **Comment:** Conservation practices should be developed on the site during construction to minimize erosion problems, mainly, sedimentation into Ainako Stream.

   **Response:** The State includes as part of all project specifications, a section on environmental protection. In it is a paragraph covering erosion (see item 4. in Appendix B of the draft EIS). The contractor's compliance to the specifications will be enforced by State inspectors.

Very truly yours,

RIKIO NISHIOKA
State Public Works Engineer

SM: jnt
cc: Dr. R. Marland

E-46
MEMORANDUM

TO: Dr. Richard E. Marland, Interim Director
Office of Environmental Quality Control

FROM: [Signature]

SUBJECT: Review of Draft EIS for Site Selection Report,
Hilo Rehabilitation Complex, Hilo, Hawaii

We have reviewed the above subject draft and would like to offer the following comments:

1. As a safety precaution, it may be necessary that some consideration be given to the provision of some type of protective barrier between the proposed facility for the handicapped and the adjoining (proposed) wilderness area.

2. The statement regarding resolution of access problems which could possibly occur as a result of the one-way traffic along Waianuenue Avenue does not seem to have been adequately covered in this draft.

3. Because of heavy rainfall in this area, possible provision of covered walkways between all buildings to facilitate access by wheelchairs might be considered.

These are the only comments we have at this time but we appreciate the opportunity to review the draft.
Honorable Shelley Mark
Director
Department of Planning and
Economic Development
State of Hawaii
Honolulu, Hawaii

Dear Dr. Mark:

Subject: Draft EIS for Site Selection Report
         Hilo Rehabilitation Complex

This is in response to your letter of June 18, 1974 to the
Office of Environmental Quality Control regarding the subject
project. Our response is presented immediately after each
comment.

1. Comment: As a safety precaution, it may be necessary
   that some consideration be given to providing a protec-
   tive barrier between the proposed facility and the
   adjoining (proposed) wilderness area.

   Response: A definite protective barrier, in terms of
   chain-link fence, etc., around the complex, will be
   included in the project.

2. Comment: The statement regarding resolution of access
   problems which could possibly occur as a result of the
   one-way traffic along Waianuenue Avenue does not seem
   to have been adequately covered in the draft EIS.

   Response: The one-way street makai condition during the
   morning peak traffic hour (7:15 a.m.-8:00 a.m.) occurs
   at the lower portion of Waianuenue Avenue between Kaumana
   Drive and Kamehameha Avenue (see attached map). During
   this period, mauka-bound traffic use Haili Street. The
   rehabilitation complex site, being far enough above the
   one-way zone, should not experience access problems even
if an alternate mauka route is used. The Hawaii County Planning Department has no objections in this regard. This response will be included in the final EIS.

3. **Comment:** Because of heavy rainfall in this area, possible provision of covered walkways between all buildings to facilitate access by wheelchairs should be considered.

**Response:** Covered walkways will be included in the project. Also included will be provisions for the handicapped such as wheelchair ramps, handrails, etc.

Very truly yours,

KENAM KIM
State Comptroller

Attachment
June 20, 1974

Dr. Richard E. Marland  
Interim Director  
Office of Environmental Quality Control  
560 Halekauwila St., Room 301  
Honolulu, Hawaii 96813  

Dear Dr. Marland:

Subject: Draft Environmental Impact Statement  
Hilo Rehabilitation Complex  
Hilo, Hawaii  

We are returning herewith a copy of the subject document with our comments noted thereon on the affected pages.

Sincerely,

[Signature]

E. Alvey Wright  
Director  

Enclosure
Honoroble E. Alvey Wright  
Director  
Department of Transportation  
State of Hawaii  
Honolulu, Hawaii  

Dear Admiral Wright:  

Subject: Draft EIS for Site Selection Report  
Hilo Rehabilitation Complex  

This is in response to your comments of June 20, 1974 to  
OEQC marked on the draft EIS. Our response is presented imme- 
diately after each comment.  

1. **Comment:** Consider redesign of the junction of the old  
and new Waianuenue Avenues.  

**Response:** Rainbow Drive (the old Waianuenue Avenue)  
meets the new Waianuenue Avenue at two locations - 900  
feet apart. The makai junction closer to Hilo town is  
being modified to a T-shaped intersection by the County  
of Hawaii. The mauka junction near the project site,  
already has a T-shaped intersection.  

2. **Comment:** Will cane grower(s) be compensated for loss  
of revenue from future crops?  

**Response:** The private growers will be compensated as  
determined by the Department of Land and Natural Resources.  

3. **Comment:** Use of cesspools is questioned, since a 16"  
sewer line services Waianuenue Avenue.
Response: Sewage from the complex will be handled by the 16" line. Reference to cesspools will be deleted. The response is included in the final EIS.

4. **Comment:** What is the area of the proposed site?

**Response:** The area of the proposed site is five acres. The response is included in the final EIS.

5. **Comment:** Existing soil condition on site should be clarified.

**Response:** In a representative profile, the surface layer is dark brown silty clay loam about 12 inches thick. The subsoil is about 48 inches thick and consists of reddish, grayish brown silty clay loam. Included are small areas of shallow soils over pahoehoe lava bedrock. Permeability is rapid, runoff is slow, and the erosion hazard is slight. The response is included in the final EIS.

6. **Comment:** Be more specific as to the one-way function of Waianuenue Avenue.

**Response:** On school days, during the morning peak traffic (7:30 a.m. - 8:15 a.m.), Waianuenue Avenue becomes a one-way street (makai) from the Kaumana Drive junction to Kamehameha Avenue. A sketch showing the one-way traffic will be included in the final EIS.

7. **Comment:** What would be the impact of noise, traffic, etc., on the adjacent private residence?

**Response:** Noise will not be a major concern during the operation of the facility. Proper acoustical treatment in the design will inhibit any noise produced by machinery, children, etc. Noise during construction will be minimized by strict enforcement of pollution control measures.

Traffic to and from the facility is not expected to be heavy during and after normal work hours. Private bus
transportation for the clientele will also help reduce vehicular traffic.

To further insure the privacy of the facility and its neighbors, fencing and landscaping will be included in the design.

The response is included in the final EIS.

8. **Comment**: Discuss the alternatives in greater detail, including location map of alternate sites, analysis and recommendations.

**Response**: A location map of all the alternate sites, along with a detailed analysis and recommendation, is included in Appendix D of the final EIS.

Very truly yours,

KENAM KIM
State Comptroller
MEMORANDUM

TO: The Honorable KeNam Kim, State Comptroller
   Department of Accounting and General Services

FROM: Richard E. Marland, Director
       Office of Environmental Quality Control

SUBJECT: Draft Environmental Impact Statement for Hilo
         Rehabilitation Complex, Hilo, Hawaii

This Office has received a total of four responses
to the proposed project named above, as of this date. An
attached sheet lists the responding agencies.

In our evaluation of the draft EIS (dEIS) and comments
provided, this Office finds several areas in which the final
EIS should expand discussion. The following comments are offered:

I. PROJECT DESCRIPTION AND NEED

   In the second paragraph of the description of the
   project site, there is no mention of the land area. It is
   recommended that this be included in the final EIS.

II. IMPACT OF THE PROJECT

A. Social
   3. Neighborhood Character (page E-5)
      The draft EIS states that "The County of Hawaii zoning
      for the site is residential (RS-10). Schools for the
      handicapped are permitted within a residential district
      provided a minimum land area of one acre is provided."
      However, since there is no mention of the area of the
      project site, this statement is incomplete.
B. Economics

5. Project Cost (pages E-6, E-7)
The discussion needs to be expanded. Phase I is mentioned, but what does it involve and include? Also, what are the other phases and their costs? These should all be included in the final EIS.

C. Environmental

1. Aesthetics (page E-7)
The last statement says that landscaping will be provided as required to minimize disturbances to its "neighbors". Who are the "neighbors"?

5. Natural or Historical Landmarks (page E-8)
This statement should be documented.

7. Traffic Condition
It is recommended that parking be discussed. That is, would parking be provided? If so, for whom, where and how many cars will be accommodated?

VII. SOCIAL COSTS AND BENEFITS OF THE PROJECT (pages E-11, E-12)

The following equation \( B = (B_T + B_I) \geq C \) is actually an invalid equation. A discussion would be more effective and informative. Equating intangible benefits and tangible benefits does not explain the reasons for it being greater that the cost of the complex.

Also, the third paragraph says that, "The actual land acquisition and construction costs can be identified with reasonable accuracy." This Office suggests that the costs be stated in the EIS.

A. New facilities will reduce building maintenance cost.
This statement should be documented.

B. Centralization of the complex would reduce transportation costs.
The cost would be reduced as compared to what? This also should be documented.

In the second to the last paragraph on page E-12, the last sentence seems to contradict the empirical equation given. Either the sentence should be reworded or be given a more detailed discussion on the opinion.

APPENDIX

2. Dust
A. It is recommended that this section be completed in the final EIS.
RECOMMENDATIONS

We recommend that: (1) written responses be sent to all commentors including this Office, indicating how specific concerns were considered, evaluated, and disposed; (2) all comments and your responses should be incorporated as an appendix to the final EIS; (3) a copy of the final EIS should be sent to those individuals that provided substantive comments to the draft EIS.

We trust that these comments will prove to be helpful to you in preparing the final EIS. Thank you for the opportunity to review the draft EIS.

Attachment
Dr. Richard E. Marland  
Interim Director  
Office of Environmental  
  Quality Control  
550 Halekauwila Street  
Honolulu, Hawaii

Dear Dr. Marland:

Subject: Draft EIS for Site Selection Report  
         Hilo Rehabilitation Complex

This is in response to your letter of June 17, 1974 regarding the subject project. Our response is presented immediately after each comment.

1. Comment: Land area should be included in description of project site.
   
   Response: The land area of the site is five acres. The response is included in the final EIS.

2. Comment: Since no area of the site is mentioned, the statement "schools for the handicapped are permitted within a residential district provided a minimum land area of one acre is provided" is unsubstantiated.
   
   Response: The area (five acres) is included in the final EIS.

3. Comment: Discussion on project cost needs to be expanded to include scope and cost for Phase I and any subsequent phases.
   
   Response: The land belongs to the State. There thus will not be any capital outlay for land acquisition. There will however be some crop loss. The Department of Land and Natural Resources will make a determination on compensation in accordance with the terms of the lease. Phase I, the Sheltered Workshop, will cost $550,000. Phase II, the Training and Day Activity Center, will cost $600,000. Phase III, the Joint-Use Facilities, will cost $252,000. The total estimated cost of the rehabilitation complex is $1,402,000. The response is included in the final EIS.
4. **Comment:** Who are the "neighbors" referred to in the statement "landscaped buffer areas will be provided as required to minimize disturbance to its neighbors".

**Response:** The neighbors of the proposed complex are:

a. Hilo Hospital in front and across Waianuenue Avenue.

b. Future residential house lots on either side.

c. Future wilderness park to the rear of the site.

5. **Comment:** Statement regarding natural or historical landmarks should be documented.

**Response:** The historical staff of the Division of State Parks, Department of Land and Natural Resources, has reviewed the site of the proposed complex and finds no known historical sites on the property. The site is presently covered with sugar cane. The response is included in the final EIS.

6. **Comment:** Parking should be discussed.

**Response:** The following parking needs will be included in the design of the facility:

a. Employee Parking - 34

b. Visitor Parking - 6

c. Handicapped Parking - 2

d. Panel-Truck Parking - 10

e. 30-Passenger Bus - 1

The parking will be designed to reduce conflict between visitors and staff.

7. **Comment:** The equation $B = (B_T + B_I) \leq C$ is invalid.

**Response:** All this equation states is that "the benefits (both tangible and intangible) derived from the project should be equal to or greater than the cost of the project. However, this equation will be deleted from the EIS to prevent any misconception of our intent.

8. **Comment:** Land acquisition and construction costs should be stated in the EIS.
Response: The cost of the project has been expanded upon as noted in a previous response. The response is included in the final EIS.

9. **Comment:** The statement, "New facilities will reduce building maintenance cost", should be documented.

**Response:** A comparison of ultimate yearly maintenance costs for different alternatives is as follows:


b. Construct new buildings on new site - $48,100/year.

The response is included in the final EIS.

10. **Comment:** The statement, "Centralization of the complex would reduce transportation costs", should be documented.

**Response:** Presently, the Sheltered Workshop and Child Training are located in the same facility. This same arrangement on the new site would eliminate the transporting of goods and clientele between facilities. Also, the joint-use of certain areas such as kitchen and dining and a common clerical staff would further reduce costs. In the future, other quasi-public agencies may want to be located in the rehabilitation complex to take advantage of the close proximity to the Sheltered Workshop and Child Training. The response is included in the final EIS.

11. **Comment:** The sentence, "However, it is felt that the benefits exceed the cost of the project", seems to contradict the empirical equation given.

**Response:** The sentence conforms to rather than contradicts the equation as explained in an earlier response. However, the equation will be deleted from the final EIS.

12. **Comment:** The section on dust control should be completed.

**Response:** The portion of the dust control section left blank will be filled in during the final design phase of the project when such information is known. The figure inserted varies with each project.

Very truly yours,

[Signature]

KENAM KIM
State Comptroller
MEMORANDUM

To: R. E. Marland, Interim Director
    Office of Environmental Quality Control

From: Sunao Kido, Chairman

Subject: Comments on Draft EIS for Site Selection Report,
        Hilo Rehabilitation Complex, Hilo, Hawaii

This Department has reviewed the above mentioned EIS, and
we are recommending an alternative site for this facility on
another part of the State land on Waianuenue Avenue, adjacent
to the site proposed in the report, and as shown on the attached
plans.

We have discussed this alternate site with the Division
of Public Works, Department of Accounting and General Services,
and feel that the facility can be constructed in this area.

This Department has no further objections to the EIS, and
the project being constructed on the alternate site as shown on
the attached plans.

Very truly yours,

BOARD OF LAND AND NATURAL RESOURCES

SUNAO KIDO
Chairman and Member

attach.

cc: DAGS
SEP 26 1974

Honorable Sunao Kido
Chairman
Department of Land and
Natural Resources
State of Hawaii
Honolulu, Hawaii

Dear Mr. Kido:

Subject: Draft EIS for Site Selection Report
Hilo Rehabilitation Complex

This is in response to your letter of September 17, 1974 to the Office of Environmental Quality Control regarding the subject project.

My staff has reviewed the alternative site recommended by your department for the rehabilitation complex. As it is adjacent to the site proposed in the report and offers the same favorable characteristics, we concur with your recommendation.

Very truly yours,

KENAM KIM
State Comptroller

SM:jnt
cc: Dr. R. Marland