ENIRONMENTAL IMPACT STATEMENT

FOR PROPOSED

VARIETY CLUB SCHOOL

HONOLULU, HAWAII

D.A.G.S. JOB NO. 02-27-1702.2

Prepared by

Gray, Rhee & Associates, Inc.
116 S. King Street, Room 508
Honolulu, Hawaii 96813

July 1, 1975
July 23, 1975

MEMORANDUM

TO: Honorable Hideo Murakami, Comptroller
       Department of Accounting and General Services

SUBJECT: ACCEPTANCE OF FINAL ENVIRONMENTAL IMPACT STATEMENT
          FOR PROPOSED VARIETY CLUB SCHOOL

Based upon the recommendation of the Office of Environmental
Quality Control, I am pleased to accept the subject document as satisfactory
fulfillment of the requirements of Chapter 343, Hawaii Revised Statutes, and
the Executive Order of August 23, 1971. This environmental impact statement
will be a useful tool in the process of deciding whether or not the action
described therein should or should not be allowed to proceed. My
acceptance of the statement is an affirmation of the adequacy of that statement
under the applicable laws, and does not constitute an endorsement of the
proposed action.

When you make your decision regarding the proposed action
itself, I hope you will weigh carefully whether the societal benefits justify
the environmental impacts which will likely occur. These impacts are
adequately described in the statement, and, together with the comments
made by the reviewers, will provide you with a useful analysis of alternatives
to the proposed action.

[Signature]

cc: Honorable Richard E. Marland
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ENVIRONMENTAL IMPACT STATEMENT
FOR PROPOSED
VARIETY CLUB SCHOOL

I. PROJECT

A. Scope

The project consists of construction of new facilities for Variety Club School to serve children with learning disabilities. The proposed site (TMK: 3-1-42: Portion 18) shown on Figure 1 is located in the Fort Ruger area of Honolulu.

B. Site

The Variety Club School site of approximately 1.7 acres is part of a total parcel of 4.29 acres which is being leased jointly with the Special Education Center of Oahu. The United Cerebral Palsy Association has also expressed interest in using part of the site and allowance has been made for them on the parcel. The site shown on Figure 2 is bounded by Palekaua Street on the east, the Hawaii Army National Guard (HARNG) motor pool on the north, the Hawaii Association for Retarded Children School to the west and the site for the proposed Special Education Center of Oahu and the proposed United Cerebral Palsy Association facility to the south.

1. Land Use and Zoning

The site is located within an area designated as urban on the Land Use District Boundary Map (Figure 1). The City and County General Plan has this area designated residential (Figure 3) and the Zoning Map has this site classified as R-3. Schools are allowed within both the urban and R-3 designations. Therefore, the proposed Variety Club School is within the permitted usage of the site.

2. Physical Condition

   a. Soils - Based on the USDA Soil Conservation Service Soil Survey Map shown on Figure 4, the soil in the area is of the Mamala Series. This series consists of shallow, well-drained soil that has been formed in alluvium deposited over coral limestone and consolidated calcareous sand.

   b. Topography - The site has a slope which ranges from 5% to 30%. The slope has its high point at the southern portion of the parcel and slopes towards a drainage ditch along the northern boundary.
LEGEND

MIL  Military
P    Park
SCH  School
RES  Residential

VARIETY CLUB SCHOOL
GENERAL PLAN
FIGURE 3

SCALE: 0 - 2000 Feet
c. **Climate** - No rainfall data is available for the site location but rainfall data at Waialae-Kahala shows an annual rainfall median of 25.2 inches and an average rainfall of 20.4 inches at Black Point. The greatest average rainfall occurs during the month of January with June being the month with the least average rainfall. This information is shown in Table 1.

3. **Access**

It is proposed that access for Variety Club School and the Special Education Center of Oahu be via Palekaua Street. In addition to the access via Palekaua Street, three other alternatives were investigated (Figure 5). Because the parcel is being co-leased by Variety Club School and SECO, the access is being considered for both sites. Alternate II shows access from Diamond Head Road with easement through the northern portion of the Hawaii Association for Retarded Children facilities. Alternate III shows access through the Hawaii Army National Guard property with construction of a separate new access for them. A fourth alternative would be to consider a separate access for the VCS site and the SECO site with VCS using the Palekaua Street access and SECO using the entry through the Hawaii Army National Guard property.

a. **Pedestrian** - Although adequate means for pedestrian access can be provided, no foot traffic is anticipated for the VCS or the SECO facilities. Transportation for the children and staff is expected to be by private vehicle or by State van bus.

b. **Vehicular** - As can be seen by Figure 5, access to the site can be provided from Palekaua Street or Diamond Head Road. The access from Palekaua Street would necessitate providing a driveway for an entrance. The streets are adequate so no other improvements would be required along Palekaua Street or the other streets connecting it.

There are two alternates considered as access from Diamond Head Road. Both alternatives would necessitate construction of a roadway to the project site. One alternate would involve obtaining an easement from HARC and the other involves obtaining an easement from the Hawaii Army National Guard as well as providing a separate access for them.

The fourth alternate would involve providing a driveway from Palekaua Street for VCS and a separate roadway through the National Guard site for SECO.

c. **Bus** - The buses that would be used by the children are provided by the State. These buses with space for ten children are actually vans in which the State transports students from various parts of the island to special schools.
TABLE 1
RAINFALL DATA

<table>
<thead>
<tr>
<th>PRI-HSPA Key No.</th>
<th>W.B.</th>
<th>Gage Name or Number</th>
<th>Elev. (ft.)</th>
<th>Period of Record</th>
<th>No. of Complete Years</th>
<th>Maximum</th>
<th>Upper Quartile</th>
<th>Median</th>
<th>Lower Quartile</th>
<th>Minimum</th>
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<tbody>
<tr>
<td>715</td>
<td>9185</td>
<td>Waialae-Kahala</td>
<td>50</td>
<td>1921-Pres.</td>
<td>35</td>
<td>40.8</td>
<td>31.5</td>
<td>25.2</td>
<td>16.7</td>
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<tr>
<td>717</td>
<td>0232</td>
<td>Black Point</td>
<td>90</td>
<td>1919-</td>
<td>38</td>
<td>42.9</td>
<td>27.5</td>
<td>20.4</td>
<td>13.5</td>
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MONTHLY RAINFALL DATA IN INCHES

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<thead>
<tr>
<th></th>
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<th></th>
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<tbody>
<tr>
<td>Max.</td>
<td>19.2</td>
<td>14.2</td>
<td>17.6</td>
<td>9.3</td>
<td>4.5</td>
<td>1.9</td>
<td>2.6</td>
<td>5.3</td>
<td>7.3</td>
<td>13.3</td>
<td>9.5</td>
<td>12.8</td>
</tr>
<tr>
<td>Med.</td>
<td>3.1</td>
<td>2.5</td>
<td>1.5</td>
<td>1.6</td>
<td>0.6</td>
<td>0.4</td>
<td>0.6</td>
<td>0.7</td>
<td>0.7</td>
<td>1.3</td>
<td>2.1</td>
<td>2.3</td>
</tr>
<tr>
<td>Min.</td>
<td>0.3</td>
<td>0.2</td>
<td>0.2</td>
<td>0.3</td>
<td>0.0</td>
<td>0.1</td>
<td>0.2</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.6</td>
</tr>
</tbody>
</table>

| Black Point              | Max. | 19.5 | 10.9 | 18.2 | 15.3 | 2.6 | 4.2 | 2.6 | 3.8 | 10.5 | 8.7 | 6.6 | 17.0 |
| Med.                     | 2.5  | 1.8  | 1.1  | 1.0  | 0.5 | 0.3 | 0.4 | 0.5 | 0.4 | 1.2  | 1.3  | 2.0  |
| Min.                     | 0.1  | 0.2  | 0.1  | T    | T   | T   | 0.1 | T   | 0.1 | T    | 0.1  | 0.4  |
ALTERNATE II
Provide 24' wide road
(30'-ft. easement) and
chain link fence

New CRM
Wall

DIAMOND
HEAD
ROAD

Scale in Feet

100

VARIETY CLUB SCHOOL
ALTERNATE II ACCESS MAP
FIGURE 5-B
VARIETY CLUB SCHOOL
ALTERNATE IV ACCESS MAP
FIGURE 5-D
4. Utilities

a. Water - There is an existing 8-inch water line along Palekaua Street. Preliminary investigation indicates that the line has adequate capacity to serve the schools. A new 8-inch water line would be extended from the existing 8-inch line at the intersection of Palekaua Street and Hakaka Street. The new 8-inch line would extend south within the parcel to serve both the Variety Club School and the Special Education Center of Oahu (see Figure 2).

b. Sewer - An existing 8-inch sewer line runs along Palekaua Street. The connection for sewer service would involve installing an 8-inch sewer line from the existing manhole at the intersection of Palekaua Street and Hakaka. The new sewer line, except the portion within Palekaua Street, will be located within the parcel to serve both the VCS and SECO facilities (see Figure 2).

c. Electric and Telephone - There are power lines along Palekaua Street, but the power requirements of the school cannot be met by these lines. New lines will have to be brought in from 22nd Avenue. There is adequate telephone service along Palekaua Street but the telephone line would probably be brought in with the electrical power lines.

5. Site Condition and Needed Work

Presently the site is overgrown with weeds and a few trees. The site is presently unimproved; therefore, before any building can be constructed, the site would have to be cleared, grubbed and graded. Utilities would have to be brought in from the main services adjacent to the site as discussed in the preceding section.

C. School Background

1. Program

The Variety Club School is organized to meet the educational needs of young children (ages 3 to 8 years) who are unable to cope in a normal school setting or where therapy services are unavailable because of their severe learning disabilities due to neurological impairment. Children accepted for admission may have disorders of perception, conceptualization, motor organization or communication along with emotional reactions to their disabilities. The purpose of the Variety Club School program is to prepare each child for placement in a normal school setting.
The Variety Club School program provides for small special education classes, speech and language therapy, and perceptual motor and gross motor training in Occupational Therapy. A weekly swimming program and annual camping program is included in the total program. A school social worker provides supportive services for parents individually and in parent study classes.

The school also serves as a training facility for University of Hawaii students in Special Education, Speech Pathology and Audiology, and Health and Physical Education. Occupational Therapy Assistant students from the Community College also receive some of their training from the facilities at Variety Club School. With the relocation of the Kapiolani Community College to the Fort Ruger-Diamond Head area, increased linkage between the VCS and Kapiolani Community College is foreseen. At present, Kapiolani Community College sends about two students each semester to VCS as part of the clinical phase of the Occupational Therapy Assistant Program. Graduate courses in Learning Disabilities are conducted at Variety Club School where students enrolled can observe and gain practical experience in the classroom as part of their course studies.

Variety Club School sponsors and participates in various workshops for its in-service training program. Department of Education and private Special Education personnel (teachers, social workers, therapists, pediatricians, etc.) are invited to participate in community service activities aimed at providing quality service for young children with special needs.

Variety Club School serves as the primary Model Learning Disability Center under a Bureau of Education for the Handicaps (BEH) grant to develop motor training curriculum for young children with learning disabilities. This project includes (1) diagnostic and perceptive remediation programs, (2) pre-service and in-service training for teachers, aides and parents, and (3) research, modification and development of motor curricula for use with young children with specific learning disabilities or both physical handicaps and special learning disabilities.

The operation is jointly coordinated by two public agencies - the University of Hawaii and Hawaii State Department of Health, plus two private agencies - Variety Club School and Sultan Easter Seal School.

2. History

The Variety Club School, then known as the Honolulu Day School, was incorporated on January 13, 1962. Established to meet the educational needs of children with learning problems caused by neurological dysfunction, the School, up to 1967, was supported
by tuition and donations. Shortly thereafter, the Variety Club of Hawaii selected the School as their local charity, and the institution subsequently became known as the Variety Club School. Funding presently is available from tuition and the State Department of Health in addition to the Variety Club of Hawaii.

The school was originally located at the Church of the Crossroads on University Avenue. Because of increasing enrollment and lack of space at that location, Variety Club School in 1968 moved to its present location at Central Union Church.

Present enrollment is 48 students. Because of limited facilities at its Central Union Church location, the school is neither able to adequately maintain its existing program nor incorporate educational innovations. Moreover, because of increased demand for specialized educational institutions of this kind, enrollment is projected to increase to 56 students with the construction of new facilities. Design of the proposed facilities at Fort Ruger allows for maximum of 70 students should the need arise.

Variety Club School of Hawaii has been searching for a suitable site for a long time. In their search, the State has been approached. Because of the availability of this parcel and similar adjacent use by the Hawaii Association for Retarded Children facilities, the State has agreed to lease the parcel jointly with the Special Education Center of Oahu.
II. IMPACT OF THE PROJECT

A. Social

1. Public Safety

As with any construction project, there should be concern for public safety. Construction activities can create hazardous conditions. Public safety considerations for construction of this project are not different for others. However, there will not be movement of extraordinarily large amounts of men, materials and earth.

To provide for public safety, effective measures must be followed during construction of the project in accordance with applicable City, State and Federal codes, standards and regulations.

Operation of the facility will increase traffic in the area primarily during the morning and afternoon hours, thereby affecting public safety after completion of construction.

2. Neighborhood Characteristics

Although schools are allowed within an urban and residential designated area, the proposed Variety Club School is not totally compatible with the adjacent neighborhood. The area map (Figure 6) shows the area immediately north of the project as occupied by the Hawaii Army National Guard motor pool, with the Diamond Head Memorial Park Cemetery and Kaimuki Intermediate School further north. The area to the west consists of the Hawaii Association for Retarded Children with single family residential units (R-6) and Diamond Head Crater further out.

To the south of the project, beyond the proposed SECO facilities, the area consists of land occupied by the Hawaii Army National Guard and R-3 and R-4 single family units.

The VCS is compatible in operation with the existing HARC and proposed SECO facilities. The HARC is an existing facility that accepts mentally retarded children.

The Special Education Center of Oahu (SECO) and the VCS will jointly lease the parcel with an area of 4.29 acres. Designed to accept students who are mentally retarded but educable, the SECO facility will have ten classrooms for a maximum of 120 students.

The operation of the Variety Club School is not compatible with the National Guard facility. Although the National Guard operations should mainly be confined to the weekend periods, there may be operations during the weekdays. The noise from the movement
LEGEND

P  Preservation
R  Residential

VARIETY CLUB SCHOOL
ZONING AND AREA MAP

FIGURE 6

Scale in Feet: 0.00 400 800 0.00 400 800
of vehicles will be disrupting to the VCS. The increase in traffic due to the school may hinder movement of the National Guard vehicles should hours of movement conflict.

The school will also create some inconvenience for the residents in the area. The increase in vehicles will create additional noise and may create traffic problems, especially during peak morning and afternoon periods. In addition, the residential lots immediately adjacent to the site will lose the open space that they now have. However, the building of the school in the residential area will be advantageous to the school because there would be a minimal amount of noise problems generated from a residential area.

3. Religious Institutions

Since the Variety Club School is presently located on the grounds of the Central Union Church, the construction of a new facility would affect the church. The church would lose its income from the payment that Variety Club School provides. On the positive side, the church should experience a reduction in traffic within the grounds. This effect on the church may be temporary primarily because the space vacated by the Variety Club School would most likely be taken up by others.

4. Displacement of Housing

The proposed site is presently unimproved and will not require displacement of any families, homes or other structures.

5. Impact of Program Implementation

The goal of the school is to provide for the educational needs of young children with learning disabilities and to prepare each child to return to regular or special classes in the public schools. This is done through an individualized readiness and academic program and specialized therapy in small classes. Because there are not enough schools offering programs for children with learning disabilities, implementation of the program is necessary to meet the demand. At the present time, there is a list of 25 children waiting to be accepted as students of the Variety Club School.

B. Economics

1. Construction

The development of the site and the construction of the facility will involve employment for a construction labor force for the
duration of the construction phase of the project. This phase of the project will also provide employment for people associated with the handling and purchasing of construction materials. The project will indirectly provide revenue to the government through taxation of the wages and materials used.

2. **Operation**

Due to the increased services provided and the increase in the number of students accepted by the Variety Club School, additional staff personnel are expected to be employed.

3. **Removal of Land from Tax Base**

Since the land is presently owned by the State, the land will not be removed from the tax base nor will an increase in tax base be realized.

4. **Relocation of Families and Businesses**

Since the project site is presently unimproved and not being utilized for business, no families or businesses will be displaced by this project.

5. **Project Cost**

It is estimated that the planning, construction and inspection cost of the project will be $1,000,000. Act 218, 1974, appropriated $900,000 towards this goal with the Variety Club raising the remaining sum.

The school is currently being funded by the Variety Club, tuition, the State Department of Health, and donations.

6. **Design and Material**

The effect of design and materials on the environment for the users should be stimulating. The building will be a combination of pods for the various functions - the administration pod on the east (Pakekaua Street), the therapy pod to the north, the pre-academic (four classrooms) pod to the west and the academic (three classrooms) pod to the south. Multi-purpose space is provided at the center of the building and will link the various pods.

The building will be developed as a one-story complex to maintain the residential scale of the adjoining neighborhood. Primary building material is a combination of stucco and wood to again blend with the character of the surrounding area. Wood fencing is to be used around the classroom patios

-15-
and garden areas of the multi-purpose space, screening external distractions and carrying out the introverted concept of the school.

Windows at classrooms and therapy areas will be minimized to achieve the stimulus-reduced environment. Air conditioning and skylights will be the primary means of providing air and natural lighting in those areas.

7. Maintenance and Operation

From an economical standpoint, maintenance costs should be minimal because the design of the facility has taken into account facilitating movement of pupils from one space to another for specific learning functions. Consequently, the building perimeter has been minimized. This layout also lowers the maintenance cost in both mechanical and custodial operations.

8. Facility Replaced

The present location of the Variety Club School is at the Central Union Church. The facility will probably be used by the church or some other group upon absence of the Variety Club School.

C. Environmental

1. Site

The physical characteristics of the site in its present undisturbed state have been described earlier in Section I.B.2. Ground slopes range from less than 5 to greater than 30 percent in the steeper areas. Because flat slab construction is to be used for the Variety Club School facilities, some grading will have to be performed. It is anticipated that as much as 1,000 cubic yards of excavation will be removed in order to install the improvements. The impact of the grading operation is discussed in Section III, A and B. Clearing of the site will remove undesirable wild vegetation, and landscaping accompanying the project should make the site more appealing. Provisions of the City's Grading Ordinance will necessarily be followed to minimize disturbance arising from the grading operations. Effects of erosion, dust and noise control are discussed in Section III, A and B.

2. Drainage

Urbanization of the site will result in greater storm runoff by decreasing rates. However, the impact of the increased runoff as a result of urbanization of the site is negligible because less than two acres are involved. The off-site drainage pattern will be retained and the site will be graded as necessary, uti-
lizing slopes and swales to provide adequate drainage. The major portion of the runoff will be directed to an existing ditch on the northern boundary next to the National Guard Motor Pool. Because of facilities already existing adjacent to the site, no further off-site drainage works are anticipated.

3. **Utilities**

Utilities serving the proposed project are already available in the area of the site.

Water service including fire protection is available via Palekaua/Hakaka Streets. Capacity of the Board of Water Supply's system will not be significantly taxed by the construction of the Variety Club School. Additional water demand generated by the project will be small, as is typical for day-only institutional facilities of this nature. Water for fire protection will be provided on-site (see Figure 2).

Sewage generated by the project will be collected internally and conveyed to the intersection of Palekaua and Hakaka Streets as shown on Figure 2. City sewer service is available on these streets and a single connection will be made to the system. The City sewer lines have adequate additional capacity to accommodate the increase in flow resulting from the implementation of the Variety Club School. Flow from the facility itself will likely be intermittent and not of a magnitude large enough to cause concern for downstream facilities.

Although telephone service is available from the adjacent street, the electrical power is inadequate and will have to be brought in from 22nd Avenue.

4. **Access**

The site is readily accessible from all parts of the island of Oahu via several major highways. Nearest major streets in the area include Diamond Head Road, 22nd Avenue and Kilauea Avenue.

The secondary streets used for access are Palekaua, Hakaka, Kaimanahila and Paikau Streets, and Puu Panini Avenue. Palekaua, Hakaka and Kaimanahila Streets and Puu Panini Avenue have 50 foot right-of-ways with 36 feet pavement widths. Paikau Street has a 60 foot right-of-way with 45 feet pavement width. All the above-mentioned streets have curbs and gutters with their pavement in good condition. The streets have a capacity of 950 vehicles per hour based on the **Highway Capacity Manual**.

The proposed access (Alternate I) is via Palekaua Street. This alternative, shown on Figure 5A consists of construction of a driveway connection at Palekaua and Hakaka Streets.
TABLE 2

ALTERNATE ACCESS COST ESTIMATES

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<td>78,000.00*</td>
<td>56,000.00**</td>
<td>134,000.00</td>
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Estimates based on offsite and onsite construction costs for Variety Club School and the Special Education Center of Oahu.

*Cost includes \( \frac{1}{2} \) of cost for access road to SECO facilities, chargeable to Variety Club School.

**Cost excludes \( \frac{1}{2} \) of cost for access road charged to Variety Club School.

TABLE 3

TRAFFIC COUNT ON PALEKAUA STREET

(7:30 a.m. to 8:00 a.m. on Thursday, April 16, 1975)

<table>
<thead>
<tr>
<th>TIME</th>
<th>SOUTH</th>
<th>NORTH</th>
</tr>
</thead>
<tbody>
<tr>
<td>7:30 to 7:35</td>
<td>5</td>
<td>6</td>
</tr>
<tr>
<td>7:35 to 7:40</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>7:40 to 7:45</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>7:45 to 7:50</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>7:50 to 7:55</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>7:55 to 8:00</td>
<td>2</td>
<td>4</td>
</tr>
</tbody>
</table>

Subtotal 9 21

Total 30
Alternate II is to construct a 24-foot wide road (30-foot wide easement) through the parcel occupied by Hawaii Association for Retarded Children (HARC). Alternate III is to also provide a new 24-foot wide road with easements within both the HARC facility and the Hawaii Army National Guard. A separate roadway is also required for this third alternative since the National Guard desires exclusive use of their own road. Alternate IV as shown on Figure 5A consists of a combination of Alternate I and Alternate III with Variety Club School using access Alternate I and SECO using access Alternate III.

From a cost standpoint, Alternate I is the lowest of the four alternatives (see Table 2). Additional advantages of having the access through Palekaua Street between the school and the adjacent residence and the potentially noisy play area will be away from the residential lots. However, other considerations must be made as to the desirability of this alternative. Of primary significance is the fact that access via Palekaua Street would involve increasing traffic through the residential area. The traffic survey taken during the period of 7:30 a.m. to 8:00 a.m. on April 17, 1975 (Table 3) shows that thirty vehicles were encountered during that period. It is estimated that the combined Variety Club School and SECO facilities will increase the traffic by 74 vehicles during the half-hour period. Under normal conditions, 8 passenger vans, 6 private vehicles and 16 staff vehicles will service the Variety Club School facility. For SECO and the United Cerebral Palsy Association, the distribution should be 12 vans, 7 private vehicles, and 25 staff automobiles. Of these, it is expected that the vans and private vehicles would not remain on the site. These projections are based on the maximum enrollment of both schools.

The major advantage of having the access road through Diamond Head Road is that no significant traffic impact on Palekaua Street and Hakaka Street will be experienced. The disadvantage of using Alternates II and III is that there will be disturbance from traffic for the HARC and the Hawaii Army National Guard facilities. Additional would be the high cost of Alternates II and III. The costs for construction of these accesses are estimated at $148,000 and $154,000 respectively. Other disadvantages of these two alternatives are that land would have to be obtained from the HARC and National Guard parcel and the building and potentially noisy play areas of the Variety Club School are placed in close proximity to the adjacent residences.

The major advantage of using Alternate IV is that a buffer zone of landscape and parking will be retained between the school and the adjacent residence. The potentially noisy play area will be away from the residential lots. When compared with Alternate I, this alternate reduces the impact of traffic along Palekaua Street (30 vehicles per half hour as compared to 74 vehicles at maximum enrollment). Alternate IV is also estimated to cost $43,000 more than Alternate I. When compared with Alternates II and III, the traffic and noise will be lower around the HARC facilities and the cost is much lower.
5. Effects of Flight Pattern

No adverse effects from the flight pattern of aircraft using Honolulu International Airport are expected. Normal takeoff and landing pattern during trade weather is over the sea. Nearest disturbance may result in takeoffs during Kona weather when overflights occur over Kaliihi and parts of downtown Honolulu.

6. Solid Waste

The Variety Club School plans to use the curb side services provided by the City and County, however, if the volume of solid wastes generated is large enough to make this plan impractical, services of a private refuse hauler will be utilized. Large amounts of solid waste will not be generated by the school and therefore, impact of collection and disposal will not be out of the ordinary.

7. Effects on Agriculture

Because the site is in the midst of an urbanized area, there will be no effect of the project on agricultural lands. The parcel at present is not used for agricultural purposes so no farmland or pasturage will be converted for development purposes.

8. Historical and Natural

Although the site is within the proposed Diamond Head Historical, Cultural and Scenic District, no places are identified by the National and State Registers of Historic Places or the National Natural Landmark Program. The parcel is located next to Diamond Head Crater, which is identified by the National Natural Landmark Program. Archaeological sites of significance as well as buildings of historic or architectural significance are non-existent.

D. Biological

1. Flora

The flora associated with the undeveloped site the proposed Variety Club School facilities will occupy are typical Leeward Oahu kiawe pasturage. Plant communities consist of grass, flowers, shrubs, and trees growing thickly in some places. Table 4 presents a listing of species identified by field observation. Cultivated and ornamental plants are noticeably lacking. Predominating are kiawe trees, koa haole, morning glories and various other shrubs and grasses. Except for kiawe, whose flowers produce honey and whose wood provides charcoal, no significant use is associated with the others. There are no known rare or endangered plant species known to inhabit the parcel.
<table>
<thead>
<tr>
<th>Common Name</th>
<th>Botanical Name</th>
<th>Pg.</th>
<th>Para.</th>
<th>Ref.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Five fingered morning glory</td>
<td>Ipomoea tuberculata</td>
<td>184</td>
<td>103</td>
<td>Pope</td>
</tr>
<tr>
<td>Desmanthus</td>
<td>Desmanthus virgatus</td>
<td>61A</td>
<td>116</td>
<td>&quot;</td>
</tr>
<tr>
<td>Koa Haole</td>
<td>Leucaena glauca</td>
<td>58</td>
<td>110</td>
<td>&quot;</td>
</tr>
<tr>
<td>Scarlet-fruited passion flower</td>
<td>Passiflora foetida</td>
<td>83</td>
<td>148</td>
<td>&quot;</td>
</tr>
<tr>
<td>Stick-tights</td>
<td>Bidens pilosa</td>
<td>143</td>
<td>244</td>
<td>&quot;</td>
</tr>
<tr>
<td>Kiewe, agaroba, mesquite</td>
<td>Prosopis pallida</td>
<td>413</td>
<td></td>
<td>Neal</td>
</tr>
<tr>
<td>Sand-burr</td>
<td>Cenchrus echinatus</td>
<td>23</td>
<td>3</td>
<td>Pope</td>
</tr>
<tr>
<td>Barbwire grass</td>
<td>Cymbopogon refractus</td>
<td>8</td>
<td></td>
<td>Hooaka</td>
</tr>
<tr>
<td>Lantana</td>
<td>Lantana camara</td>
<td>723</td>
<td></td>
<td>Neal</td>
</tr>
<tr>
<td>Finger grass</td>
<td>Chloris inflata</td>
<td>69</td>
<td></td>
<td>&quot;</td>
</tr>
<tr>
<td>Pigweed, purslane</td>
<td>Portulaca oleracea</td>
<td>68</td>
<td>30</td>
<td>Pope</td>
</tr>
<tr>
<td>Bristly foxtail</td>
<td>Chaetochlos verticillata</td>
<td>20</td>
<td>2</td>
<td>&quot;</td>
</tr>
<tr>
<td>Garden spurge</td>
<td>Euphorbia hirta</td>
<td>130</td>
<td>70</td>
<td>&quot;</td>
</tr>
<tr>
<td>Little ironweed</td>
<td>Vernonia cinerea</td>
<td>230</td>
<td>130</td>
<td>&quot;</td>
</tr>
<tr>
<td>Ilima</td>
<td>Sida Fallax</td>
<td>113</td>
<td></td>
<td>St. John</td>
</tr>
<tr>
<td>Prickly sida</td>
<td>Sida spinosa</td>
<td>143</td>
<td>79</td>
<td>Pope</td>
</tr>
</tbody>
</table>
TABLE 5
HAWAII AUDUBON'S SOCIETY CHRISTMAS COUNT 1973,
DIAMOND HEAD, KAIMUKI TO PAIKO LAGOON

0655 to 1815 hours. Weather clear all day with temperature ranging 68° to 78° F; winds 0 - 10 m.p.h. from the north.

<table>
<thead>
<tr>
<th>Bird Species</th>
<th>Number Observed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black-crowned Night Heron</td>
<td>5</td>
</tr>
<tr>
<td>Pacific Golden Plover</td>
<td>197</td>
</tr>
<tr>
<td>Ruddy Turnstone</td>
<td>21</td>
</tr>
<tr>
<td>Wandering Tattler</td>
<td>1</td>
</tr>
<tr>
<td>Sanderling</td>
<td>9</td>
</tr>
<tr>
<td>Hawaiian Stilt</td>
<td>2</td>
</tr>
<tr>
<td>Spotted Dove</td>
<td>103</td>
</tr>
<tr>
<td>Barred Dove</td>
<td>430</td>
</tr>
<tr>
<td>Mockingbird</td>
<td>3</td>
</tr>
<tr>
<td>Common Mynah</td>
<td>423</td>
</tr>
<tr>
<td>Japanese White-eye</td>
<td>92</td>
</tr>
<tr>
<td>Ricebird</td>
<td>32</td>
</tr>
<tr>
<td>House Sparrow</td>
<td>471</td>
</tr>
<tr>
<td>Cardinal</td>
<td>39</td>
</tr>
<tr>
<td>Brazilian Cardinal</td>
<td>45</td>
</tr>
<tr>
<td>House Finch</td>
<td>39</td>
</tr>
</tbody>
</table>

Number of individual birds: 1912
Number of species: 16
2. Fauna

Mammals commonly associated with these dense thickets of wild vegetation include mongooses, rats and mice. There are no known endangered species of fauna existing within the present site. Avifauna existing within the area from Diamond Head Crater to Paiko Lagoon as cited in the "Environmental Assessment for Relocation of Kapiolani Community College to Fort Ruger" is abundant for an urbanized area. Observations of the Hawaii Audobon Society in 1973 are reproduced in Table 5. The table is included only to show the variety of species observed in this and adjacent areas and is neither intended to provide a measure of numbers nor exclusiveness for the area specific to the Variety Club School site. There are no known endangered or protected species of birds on the site.

3. Impact

Provision of facilities for the Variety Club School will involve clearing and grading which will necessarily destroy the character of the existing undisturbed vegetation. Clearing would not have any adverse impact because of the absence of rare or endangered plant species within the areas. Removal of the wild vegetation will eliminate the habitats of the mongoose and mice and rats. However, this is not an adverse impact because of the undesirability of these and other vermin.

Removal of the trees and underbrush will destroy the nesting areas of avifauna associated with the site. However, with the landscaping anticipated with the project, it is likely that the bird population will adapt to the new surroundings rather than migrate. Avifauna should not be disrupted by the activities associated with the Variety Club School.

E. Cultural

1. Recreation

The proposed site has little or no recreational value at the present time. Due to the closeness of homes to the site, hunting in the area would be hazardous. The only value that could be associated with recreation on the site would be hiking, but of a limited value because of the overgrowth present and the minimal area.

After the development of the site, the playground and other recreational facilities would be available to the students and probably other control groups.

2. Aesthetics

The site presently acts as undeveloped open space area for which there may be assigned some aesthetic value. The site, however, is overgrown with various plants and trees normally considered
undesirable growth. Horticultural and cultivated plant species are noticeably lacking and except for the kiawe, plant species of practical use to man are absent. With the development of the site, landscaping with more aesthetically pleasing plant communities would be available in the open space around the buildings.

Although there are no significant landmarks or buildings on the site, the parcel is at the foot of Diamond Head, a national natural landmark, and within the proposed Historical, Cultural and Scenic District. Aesthetic values attributed to its proximity to the site will not be destroyed by the construction of the Variety Club School. One story construction approximately 24 feet in height is to be used exclusively and existing views should be preserved.

3. Educational

The primary objective of this project is to provide a new facility so the Variety Club School can better serve children with learning disabilities by incorporating educational innovations into the program. Construction of the school will provide for a greater number of students. Implementation of the program will have a beneficial impact directly for those students benefiting from the program and indirectly for the educational system and other people of the State.
III. ADVERSE ENVIRONMENTAL EFFECTS

A. Construction

During construction of the facility, some adverse effects can be expected.

1. Erosion

There will probably be some temporary erosion from the site discharging towards the adjacent drainage ditch. Severity of the erosion problem would depend on the time of the year that grading operations are carried out, i.e., wet or dry season. However, the amount of grading is relatively small and the area is relatively dry, so that any erosion would be easy to control. Erosion control procedures to be followed during construction will include temporary berms, cut-off ditches, planting of ground cover immediately after grading and silting basins. The grading work will conform to Chapter 23, Revised Ordinances of Honolulu, 1969, as amended (Ordinance No. 3968) and with the applicable provisions of the Water Pollution Control and Water Quality Standards contained in the Public Health Regulations, State Department of Health, on Water Pollution Control and Water Quality Standards.

2. Noise

Construction equipment and machinery noise will be audible throughout the construction phase on site as well as from the movement of equipment through the residential areas. The noise-producing equipment and machinery are internal combustion engines, compressors, generators, tractors, etc. The normal noise control procedures of construction activities will be used. These controls include no use of explosive and no use of non-highway vehicular equipment prior to 6:45 a.m. without prior approval of the County Engineer, and mufflers for all internal combustion engine-powered equipment.

Even with the noise control measures, it is expected that there will be significant noise from the construction site during working hours.

3. Air

Construction will affect the air quality. Air pollution will be caused by exhausts from construction equipment and dust from grading operation. The dust from the site will be controlled by the use of sprinkling of water on the ground and ground cover of graded area. Effects of construction activities on the ambient air quality are temporary and will cease as soon as construction is completed. The project is not of such magnitude as to cause a severe air pollution problem.
B. Operation

1. Erosion

The effects of erosion during operation of the school should be minimal. After building and landscaping of the site, it is expected that the problem will be reduced from its condition during grading and construction operations.

2. Noise

It is not expected that there will be much noise during the hours between 7:30 a.m. and 2:30 p.m. when students are in school. There will be some noise when the children are on the playground, but this would be for short periods of time. Normal operation would call for tranquil surroundings for classroom effectiveness.

It is also expected that there would be some increase in noise due to the added number of vehicles. These will be limited mainly to two half-hour periods from 7:30 a.m. to 8:00 a.m. and 2:00 p.m. to 2:30 p.m.

It is expected that the school will have little problem meeting the noise standards set by the Department of Health.

3. Air

There will be a small increase in air pollution levels because of the increase in traffic generated from operation of the facility. Increase in pollution attributable to operation of the facility itself will be minimal.

4. Social

Construction of the facility with the site proposed will have some social environmental effect. Of primary significance is the conversion from present undeveloped open wasteland to a school for handicapped children. The effect would be adverse to those people living in the immediate adjacent residential area who may have expected that the land would remain vacant or be developed for residential use. The State, however, had made the site available to the National Guard so some indication of use other than residential could be foreseen. Because the school is a permitted use under residential designation, land use laws would not be violated. Nevertheless, a sincere effort has been made to minimize the disturbance to adjacent residents by effectively utilizing buffer space, screening and fencing.

Construction of the school could tend to lower the value of adjacent residences and the extent would depend on the effectiveness of the proposed buffering.
IV. ALTERNATIVES

The alternatives available in lieu of building the new Variety Club School at the site are:

1. Retain the Variety Club School at the present site at Central Union Church.

2. Locate the new Variety Club School at another site.

Retaining the Variety Club School site would be detrimental because the program offered to the children would be limited to the inadequacy of the existing facilities. The present facility was not designed for children with learning disabilities and the building is old and not compatible with the goals of the Variety Club School. The school playground is also inadequate and some of the facilities are located in separate buildings which have no connecting covered walkways.

Locating the Variety Club School at another site would tend to decentralize the special education schools because the Hawaii Association for Retarded Children is located on an adjacent site and the adjacent site is programmed for the Special Education Center of Oahu.

The school should also be located in the Honolulu area because presently 29 of the 48 students are from the Honolulu area and it is not expected that the ratio will change.

Because of limited funds, the school does not have the ability to purchase other parcels of sufficient size to suit their needs within a centrally located area. They therefore turned to the State in seeking help to locate and provide the necessary facilities. This particular site was available and was earmarked for usage by other agencies with compatible objectives. The State thereby agreed to lease the land to the Variety Club School and provide assistance in establishing its goals.
V. RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The short-term effect on man's environment which the building of the school will cause will be offset by the following:

1. The new Variety Club School will provide a better educational facility for the children.

2. The proposed complex will be in accordance with the State's goal of promoting educational opportunity for all citizens.
VI. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Because there is no significant value attached to the site in its present unurbanized condition and there are no resources worthy of mention, the commitment of resources from the land is negligible. The commitment of resources required to accomplish the project includes labor which is irretrievable and material which would have some salvage value should the school be demolished. The proposed facility could also be used for other purposes and should the school be demolished, the site could also be used for other purposes.
VII. SOCIAL COSTS AND BENEFITS

The costs and benefits of the project are narrative with no attempt to quantify the costs of benefits.

The economic cost of the project was covered in Section II. Social costs that may be associated with the construction of the Variety Club School are the loss of undeveloped open space and possible devaluation of adjacent property values because of proximity to the school facilities and increase in traffic generated by the project.

The benefits of the project are as follows:

A. The new facilities will increase the services available for children with learning disabilities and also increase the number of students the Variety Club School will be able to accommodate.

B. The program enables students to return to public schools.

C. The school serves as a training facility for the College of Education, Department of Special Education and the Community College Occupational Therapy Assistant Program.
BIBLIOGRAPHY


7. "Environmental Assessment for Relocation of Kapiolani Community College to Fort Ruger (East Honolulu Community College)."
APPENDIX A

Review Comments and Responses
MEMORANDUM

TO: The Honorable Hideo Murakami, Comptroller
Department of Accounting & General Services.

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

SUBJECT: Draft Environmental Impact Statement for the Variety Club School, DAGS Job No. 02-27-1702.2

This Office has completed its review of the subject draft EIS. As of this date, we have received a total of fifteen (15) comments from various agencies as identified on the attached sheet.

In general, the draft EIS is an adequate document. However, we offer a few comments below for your consideration.

COMMENTS

1. Are there adequate parking facilities within the school grounds for both the Variety Club and SECO? Will off-street parking be utilized? If so, will residential off-street parking be affected?

2. Will the construction schedule for the Variety Club School be simultaneous with SECO? It would be environmentally desirable if both the Variety Club School and SECO projects commenced simultaneously.

3. The EIS should note that in the proposed Diamond Head Historical, Cultural, and Scenic Districts, heights will be limited to 25 feet. In addition, the EIS should discuss whether or not the Variety Club School will conform to this height limitation.
4. Please coordinate your efforts for drainage facilities with the City and County's Department of Public Works, Division of Engineering, Drainage Section.

RECOMMENDATIONS

For brevity, we have not attempted to summarize each agency/organizations' comments. We recommend that they each be given individual attention with written responses sent to them indicating how specific concerns were considered, evaluated, and disposed. This Office would appreciate a copy of these responses.

For the final EIS, we recommend that: 1) all comments and your responses be appended to the final EIS, incorporating comments as appropriate within the context of the final EIS; and 2) a copy of the final EIS be sent to those individuals who provided substantive comments to the draft EIS.

Thank you for the opportunity to review the subject environmental impact statement. We sincerely look forward to the final environmental impact statement.

Attachments
LIST OF COMMENTORS FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR VARIETY CLUB SCHOOL, DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

Date of Receipt

FEDERAL

✓ Soil Conservation Service
✓ U.S. Army Corps of Engineers
✓ Department of the Air Force
✓ Department of the Army

May 8, 1975
May 19, 1975
May 29, 1975
June 3, 1975

STATE

✓ Department of Health
✓ Department of Land & Natural Resources
✓ Department of Transportation
✓ Department of Planning & Economic Development

May 8, 1975
May 20, 1975
May 23, 1975
June 6, 1975

CITY AND COUNTY OF HONOLULU

✓ Department of General Planning
✓ Department of Public Works
✓ Board of Water Supply
✓ Department of Housing and Community Development
 Department of Land Utilization
 Department of Transportation Services

May 14, 1975
May 15, 1975
May 16, 1975
May 19, 1975
May 27, 1975
June 2, 1975

UNIVERSITY OF HAWAII

✓ Environmental Center

May 30, 1975

* No comments
Dr. Richard E. Marland  
Director  
Office of Environmental Quality Control  
Room 301  
550 Halekauwila Street  
Honolulu, Hawaii 96813  

Dear Dr. Marland:

Subject: Environmental Impact Statement  
Variety Club School

Transmitted herewith are twenty copies of the final Environmental Impact Statement for the Variety Club School.

We have responded individually to the following agencies with copies to your office:

State Department of Planning and Economic Development.  
City and County of Honolulu, Department of General Planning.  
City and County of Honolulu, Department of Public Works.  
City and County of Honolulu, Department of Land Utilization.  
City and County of Honolulu, Department of Transportation Services.  
University of Hawaii Environmental Center.

Our response to your comments is as follows:

1. Parking: There will be 24 parking spaces for Variety Club School while the Special Education Center of Oahu and the United Cerebral Palsy Association will have 22 and eight parking spaces, respectively. Based on one parking stall per staff member, a total of 41 stalls are required for the three facilities while 54 stalls are provided. Therefore, off-street parking usage is not anticipated.
2. **Construction Schedule:** The Variety Club School plans to start construction of the project in October of 1975, while the Special Education Center of Oahu plans to start in November of 1975. With construction of both facilities planned for approximately the same time, all phases of construction will be coordinated by VCS and SECO.

3. **Height Limitation:** In the final EIS, it was noted that the maximum height of the VCS building will be approximately 24 feet which is within the proposed Diamond Head Historical, Cultural and Scenic District's height limitation of 25 feet.

4. **Drainage:** The preliminary drainage plan for the VCS has been reviewed by the Drainage Section of the Division of Engineering and is acceptable. The final drainage plan will also be coordinated with the Drainage Section for approval.

Per your recommendations, a copy of the final EIS has been sent to those individuals who provided substantive comments to the draft EIS.

Very truly yours,

[Signature]

HIDEO MURAKAMI
State Comptroller

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

RE: Proposed Variety Club School, HNL, HI

☐ EIS returned: project does not pertain to SCS activities and/or responsibilities.

☒ EIS xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx No comments

Francis C. H. Lum
State Conservationist

5/6/75 Date
Dr. Richard E. Marland, Director
Office of Environmental Quality Control
State of Hawaii
550 Halekauwila Street
Honolulu, Hawaii 96813

Dear Dr. Marland:

We have reviewed the draft environmental impact statement for the Proposed Variety Club School and have no comments to offer. Thank you for the opportunity to review this statement.

Sincerely yours,

[Signature]

Kisuk Cheung
Deputy Chief, Engineering Division
DEEE (Mr. Kimura, 4492158)  

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

We have no comment to render relative to the draft environmental impact statements for the following projects:

a. Hanamalu Sewer Extension

b. Variety Club School

c. Actions in Hawaii Kai Marina

d. Drainage Channel Improvement at Waimanalo

e. Volcano Road (Slaughter House Road)

f. Ala Moana Sewage Force Main

ROBERT Q K CHING  
Chief, Engrg & Constr Div  
Dep Comdr for Civil Engineering
Richard E. Marland, PhD  
Director  
Office of Environmental Quality Control  
State of Hawaii  
Room 301, 550 Halekauwila Street  
Honolulu, Hawaii 96813

Dear Dr. Marland:

We have reviewed the Draft Environmental Impact Statement for the Proposed Variety Club School, Honolulu, Hawaii. We have no comments to offer at this time.

Thank you for the opportunity to review the statement.

Sincerely,

[Signature]

LEE C. HERWIG, JR.
Colonel, MSC  
Environmental Consultant to Commander,  
U.S. Army Support Command, Hawaii
MEMORANDUM

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

From: Deputy Director for Environmental Health

Subject: Draft Environmental Impact Statement (EIS) for Proposed Variety Club School, Honolulu, Hawaii

Thank you for allowing us to review and comment on the subject EIS. Please be informed that we have no objections to this project.

We realize that the statements are general in nature due to preliminary plans being the sole source of discussion. We, therefore, reserve the right to impose future environmental restrictions on the project at the time final plans are submitted to this office for review.

JAMES S. KUNAGAI, Ph.D.
May 15, 1975

Environmental Quality Commission
550 Halekauwila St., Rm. 301
Honolulu, Hawaii  96813

Gentlemen:

We have reviewed the EIS for the new Variety Club School.

The project will have no adverse effect on any known historic or archaeological site. We note that the buildings are to be no higher than one story.

This Board has approved a lease for the school.

Very truly yours,

[Signature]

CHRISTOPHER COBB
Chairman of the Board

cc:  Land Management
     State Parks
Dr. Richard E. Marland
Interim Director
Office of Environmental
    Quality Control
550 Hakaauwila St., Room 301
Honolulu, Hawaii 96813

Dear Dr. Marland:

Subject: Draft EIS, Variety Club School
    Honolulu, Hawaii

In reference to the subject statement, we have no comments to
offer as it relates to and affects our transportation system.

Sincerely,

[Signature]
E. Alvey Wright
Director
June 5, 1975

Ref. No. 3911

MEMORANDUM

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

FROM: Hideto Kono, Director

SUBJECT: Draft EIS for Proposed Variety Club School, Honolulu, Hawaii

We have reviewed the subject draft and have the following comments to offer.

We find that the subject draft statement has adequately assessed the probable impacts that the proposed development might have on the environment. However, in view of the upcoming relocation of the Kapiolani Community College into the Diamond Head - Fort Ruger community, we feel that the statement should also include a discussion of the subject proposal as it relates to that higher educational facility. This reevaluation may beneficially aid in providing a sound basis for the selection of this site for the planned facility, or suggest possible economies in usage of educational facilities which will further the objectives of the subject program. Accordingly, we suggest that the above consideration be appropriately integrated into the final report in order that a more meaningful review of the proposal can be conducted.

We appreciate the opportunity to review the subject statement.
Honorable Hideto Kono
Director
Department of Planning
and Economic Development
State of Hawaii
Honolulu, Hawaii

Dear Mr. Kono:

Subject: Draft Environmental Impact Statement
Proposed Variety Club School

This is in response to your memorandum of June 5, 1975, to the Office of Environmental Quality Control regarding the subject project. In response to your comments, the following statement will be incorporated in the final Environmental Impact Statement:

"Occupational Therapy Assistant students from the Community College system also receive some of their training from the facilities at Variety Club School. With the relocation of the Kapiolani Community College to the Fort Ruger-Diamond Head area, increased linkage between the Variety Club School and Kapiolani Community College is foreseen. At present, Kapiolani Community College sends about two students each semester to the Variety Club School as part of the clinical phase of the Occupational Therapy Assistant Program."

Very truly yours,

HIDEO MURAKAMI
State Comptroller
May 12, 1975

Dr. Richard E. Marland, Interim Director
Office of Environmental Quality Control
State of Hawaii
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Dr. Marland:

Variety Club School
Draft Environmental Impact Statement

We appreciate the opportunity to review the above-captioned draft environmental impact statement and find that the project's impact on the environment has been adequately stated.

We might add, however, that although the zoning of the development site is R-3, which would permit the construction of this educational facility, the proposal is inconsistent with the land use policy for the City and County of Honolulu. A Detailed Land Use Map has not been adopted for the Diamond Head area, but the land in question, under the Oahu General Plan, has been earmarked for residential purposes. It has been the policy of this department to designate all educational facilities as "public facilities".

The Variety Club should coordinate their improvement plan with other public improvements programmed (i.e., Kulamanu Street Relief Drain and the East Honolulu Community College projects) in close proximity to the development site to avoid unnecessary disruption of services and to achieve consistency in planning efforts for the communities affected.

Sincerely,

Robert R. Way
Chief Planning Officer

RRW:fmt
Mr. Robert R. Way  
Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Way:

Subject: Draft Environmental Impact Statement  
Proposed Variety Club School

This is in response to your letter of May 12, 1975, to the Office of Environmental Quality Control regarding the subject project. We have the following response to offer:

1. Oahu General Plan - The Building Department has stated that they will process a building permit without a General Plan amendment if the Variety Club School can prove that their academic curriculum is similar to public schools, since private schools with similar academic curriculums as public schools are a permitted use under R-3 zoning.

2. Coordination with other public improvements program - The Variety Club will coordinate their improvement plan with other public improvements programmed.

Very truly yours,

[Signature]

HIDEO MURAKAMI  
State Comptroller
May 13, 1975

Office of Environmental Quality Control
Office of the Governor
State of Hawaii
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Gentlemen:

Subject: Draft Environmental Impact Statement
for Proposed Variety Club School,
Honolulu, Hawaii

We have reviewed the statement and have the following comments.

Wastewater: The existing East Kaimuki Trunk Sewer is adequate to serve the proposed development. A common sewer connection on Palekaua Street for the Variety Club and SECO Schools is satisfactory. The design of the new 8-inch sewer within the roadway and other connection requirements must be coordinated and approved by the Division of Sewers. The Sand Island system will have sufficient capacity to provide the necessary treatment and disposal requirements for wastewater generated by the proposed school.

Solid Waste: Solid waste will be collected by the Division of Refuse Collection and Disposal; however, only curb side services will be handled.

Drainage: The discussion on the proposed drainage for the site is unclear. Further clarification is requested.

Very truly yours,

[Signature]

Director and Chief Engineer

cc: Div. of Engineering
Div. of Sewers
Div. of Refuse Collection & Disposal
Mr. Kazu Hayashida  
Director and Chief Engineer  
Department of Public Works  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii  96813  

Dear Mr. Hayashida:  

Subject: Draft Environmental Impact Statement  
Variety Club School  

This is in response to your letter of May 13, 1975, to the Office of Environmental Quality Control regarding the subject project. We have the following response to offer:  

1. Wastewater: The design of the new eight-inch sewer within the roadway and other connection requirements will be coordinated with the Division of Sewers for approval.  

2. Solid Waste: The following statement will be incorporated into the final Environmental Impact Statement:  

"The Variety Club School plans to use the curbside service provided by the City and County of Honolulu; however, if the volume of solid waste generated is large enough to make this plan impractical, services of a private refuse hauler will be utilized. Large amounts of solid waste will not be generated by the school and, therefore, impact of collection and disposal will not be out of the ordinary."  

3. Drainage: The drainage plan will be coordinated with the Drainage Section of the Department of Engineering.  

The following statement will also be incorporated in the final Environmental Impact Statement:
"Urbanization of the site will result in greater storm runoff by decreasing rates. However, the impact of the increased runoff as a result of urbanization of the site is negligible because less than two acres are involved. The off-site drainage pattern will be retained and the site will be graded as necessary, utilizing slopes and swales to provide adequate drainage. The major portion of the runoff will be directed to an existing ditch on the northern boundary next to the National Guard Motor Pool. Because of facilities already existing adjacent to the site, no further off-site drainage works are anticipated."

The preliminary drainage plan has been reviewed with the Drainage Section and the final drainage plan will be coordinated with the Drainage Section for approval.

Very truly yours,

HIDEO MURAKAMI
State Comptroller
May 14, 1975

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

Dear Dr. Marland:

SUBJECT: Draft Environmental Impact Statement
Proposed Variety Club School

We have reviewed the draft impact statement and have no objections or comments on the proposed school.

Should further information be required, contact Mr. Lawrence Whang at 548-5221.

Very truly yours,

[Signature]
Edward Y. Hirata
Manager and Chief Engineer
May 6, 1975

Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Gentlemen:

Subject: Draft EIS for Proposed Variety Club School in Ft. Ruger Area

We have reviewed the Draft Environmental Impact Statement for the proposed Variety Club School in the Fort Ruger area.

We have no comments to offer as it relates to and affects our department's relocation program.

We appreciate this opportunity to review the draft EIS.

Sincerely,

WILLIAM BLACKFIELD
Director
MEMORANDUM

TO : DR. RICHARD E. MARLAND, DIRECTOR
     OFFICE OF ENVIRONMENTAL QUALITY CONTROL

FROM : GEORGE S. MORIGUCHI, DIRECTOR OF LAND UTILIZATION

SUBJECT : ENVIRONMENTAL IMPACT STATEMENTS FOR SPECIAL EDUCATION
           CENTER OF OAHU AND VARIETY CLUB SCHOOL (FORT RUGER)

Since the proposed uses are similar and would occupy adjacent sites, we have reviewed the environmental impact statements simultaneously. The comments which follow are addressed specifically to the adequacy of the statements as disclosure documents.

A. Traffic Impact, Access, and Parking

            II. C. 7., "Pollution," p. 5
            VII., "Social costs and benefits of this project," p. 7

VCS -- I. B. 3. b., "Vehicular," p. 6
      I. C. 2., "History," p. 11

Comments:

(1) Existing streets should be described, i.e., right-of-way, pavement width, capacity, and condition.

(2) There appears to be a minor discrepancy in describing access Alternate 4 between page 2 of the SECO statement and page 17 of the VCS statement.
(3) While the VCS statement does contain some estimates on the number of vehicles required for the operation of both schools, only the effects on peak-hour a.m. traffic are discussed. Do these estimates take into account future enrollment increases, the existing requirements of the Hawaii Association for Retarded Children facility, and proposed use by the United Cerebral Palsy Association?

(4) By our letter of May 1, 1975, tentative approval was granted for the proposed consolidation and resubdivision of land for the school sites (reference copy attached). It was noted at that time that a second access, in addition to that proposed from Palekaua Street, would be desirable.

(5) The statements should discuss the location of parking areas and the number of spaces to be provided.

B. Consultation With Other Public Agencies

           II. B. 5, "Maintenance and operating features," p. 4

VCS -- I. B. 1, "Land Use and Zoning," p. 1
       I. B. 4, "Utilities," p. 9
       II. C. 2, "Drainage," p. 16
       II. C. 3, "Utilities," p. 17

Comments:

(1) The site is not zoned R-6 as stated in the SECO document, but R-3 Residential District as noted in the VCS statement. The Building Department should be consulted regarding compliance with the Comprehensive Zoning Code.

(2) A list of public agencies or private firms consulted on the adequacy of utilities and drainage facilities should be appended to the statements.

C. Compatibility with Existing Uses

Reference: SECO -- II. A. 2, "Neighborhood Characteristics," p. 3
           II. C. 1, "Aesthetics," p. 4

-55-
II. B. 2, "Aesthetics," p. 23

Comments:

(1) Graphics should be revised to show precisely where single-family residential dwellings are in relation to the proposed sites.

(2) There are insufficient details regarding landscaping and setbacks. Noise and visual buffering will be critical in minimizing effects on the neighborhood.

(3) As noted in the VCS statement, the site is within the proposed Diamond Head Historical, Cultural and Scenic Districts, where a height limit of 25 feet is proposed.

In summary, while we support the basic objectives of the actions proposed, we feel certain aspects have not been fully discussed in the environmental impact statements.

We appreciate the opportunity to review and comment on the above.

GEORGE S. MORIUCHI
Director

GSM:rh
Attachment
Mr. George S. Moriguchi  
Director  
Department of Land Utilization  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Moriguchi:

Subject: Draft Environmental Impact Statement  
Proposed Variety Club School

This is in response to your letter of May 21, 1975, to the Office of Environmental Quality Control regarding the subject project. Our response is presented immediately after each comment.

1. **Comment:** Existing streets should be described, i.e. right-of-way, pavement width, capacity and condition.

Response: The following response will be included in the final Environmental Impact Statement:

"The secondary streets used for access are Palekaaua, Hakaka, Kalimanahila and Paikau Streets and Puu Panini Avenue. Palekaaua, Hakaka, Kalimanahila Streets and Puu Panini Avenue have 50-foot rights-of-way with 36 feet pavement widths. Paikau Street has a 60-foot right-of-way with forty-four-foot pavement width. All the above-mentioned streets have curbs and gutters with their pavement in good condition. The streets have a capacity of 950 vehicles per hour based on the Highway Capacity Manual."

2. **Comment:** There appears to be a minor discrepancy in describing access Alternate IV between page 2 of the SECO statement and page 17 of the VCS statement.

Response: The final Environmental Impact Statement will include the following statement:

"Alternate IV as shown on Figure V-D consists of a combination of Alternate I and Alternate III with VCS using access
Alternate I and SECO using access Alternate III."

3. **Comment:** While the VCS statement does contain some estimates on the number of vehicles required for the operation of both schools, only the effects on peak-hour a.m. traffic are discussed. Do these estimates take into account future enrollment increases, the existing requirements of the Hawaii Association for Retarded Children facility and proposed use by the United Cerebral Palsy Association?

**Response:** The peak-hour a.m. traffic is covered because it is expected that the school traffic will coincide with the local peak-hour traffic while the afternoon traffic from the schools (between 2:30 p.m. and 3:00 p.m.) will not coincide with the local afternoon peak traffic. The estimated traffic is based on the projected maximum enrollment for the Variety Club School, the Special Education Center of Oahu and the United Cerebral Palsy Association. The Hawaii Association for Retarded Children presently has approximately 16 vans and 18 private vehicles and the projected maximum number of vehicles is 20 vans and 25 private cars.

4. **Comment:** By our letter of May 1, 1975, tentative approval was granted for the proposed consolidation and resubdivision of land for the school sites (reference copy attached). It was noted at that time that a second access, in addition to that proposed from Palekaua Street, would be desirable.

**Response:** Provisions for a second access have been investigated and as reflected in the revised Table 2, the cost of providing a second access to the site. As shown on the revised figure, the total cost of providing for a second access is approximately 47% higher than providing a single access through Palekaua Street. It was, therefore, concluded that costwise, the second access to the site is not justified.

5. **Comment:** The statements should discuss the location of parking cars and the number of spaces to be provided.

**Response:** Figure 2 has been revised to reflect the total number of parking spaces. The revised Figure 2 and the following statement will be included in the final Environmental Impact Statement:

"The parking for the schools will be separated. Variety Club School will have 24 parking spaces while the Special Education Center of Oahu and the United Cerebral Palsy Association will have 22 and eight parking spaces, respectively."
6. Comment: The site is not zoned R-6 as stated in the SECO document, but R-3 Residential District as noted in the VCS statement. The Building Department should be consulted regarding compliance with the Comprehensive Zoning Code.

Response: The Building Department has been contacted and mentioned that "the Special Education Center of Oahu (SECO) and the Variety Club School are private schools. Therefore, it is a permitted use in the R-3 Residential District if the abovementioned private schools have similar academic curriculums as the public schools." VCS is presently securing the Department of Education's acknowledgement that their academic curriculum is similar to other public schools.

7. Comment: A list of public agencies or private firms consulted on the adequacy of utilities and drainage facilities should be appended to the statements.

Response: The agencies and firms consulted on the adequacy of utilities and drainage are as follows:

Bennett and Drane - Electrical Consulting Engineers on the electrical and telephone.

William Hee and Associates, Inc. - Civil Engineers on the water, sewer and drainage.

Hawaiian Electric Company informed Bennett and Drane that only single phase power is available along Palekaua Street and that three phase power would have to be brought from 22nd Avenue.

The capacities of the sewer were checked with the Division of Sewers and water demand was checked with the Board of Water Supply. Both agencies indicated that preliminary design information indicates that these utilities are adequate.

William Hee and Associates, Inc. checked with the Drainage Section of the Division of Engineering on the drainage plan and preliminary design information indicates that the off-site facilities are adequate.

8. Comment: Graphics should be revised to show precisely where single-family residential dwellings are in relation to the proposed site.
Mr. George S. Moriguchi  
Letter No. FM-1347.5  
Page 4

Response: Figure 2 has been revised to show the location of the single-family residential dwellings in relation to the site.

9. Comment: There are insufficient details regarding landscaping and setbacks. Noise and visual buffering will be critical in minimizing effects on the neighborhood.

Response: The following statement will be incorporated in the final EIS discussion:

"The buffer zone between the closest residential lot property line and the Variety Club School includes a five-foot planting strip which will be designed to provide adequate visual screening, 40 feet of parking and driveway, four feet of walkway and eight feet of planting space between the walkway and the administration building. The eight-foot space will have low shrubs and trees planted within it for additional screening."

10. Comment: As noted in the VCS statement, the site is within the proposed Diamond Head Historical, Cultural and Scenic Districts, where a height limit of 25 feet is proposed.

Response: The following sentence will be added to Section II, E, 2 "Aesthetics" of the final Environmental Impact Statement:

"One-story construction approximately 24 feet in height is to be used exclusively and existing views should be preserved."

Very truly yours,

HIDEO MURAKAMI  
State Comptroller
Office of Environmental Quality Control
550 Halekauwila Street
Honolulu, Hawaii  96813

Gentlemen:

Subject:  Review of Draft EIS
          Proposed Variety Club School
          Honolulu, Hawaii

The following comments are submitted following review of the subject matter:

Palekaua and Hakaka Streets are adequate to handle the additional traffic generated under Alternate I. However, Alternate IV would divert over one-half of this traffic to Diamond Head Road, thus lessening the traffic impact on those two streets, and should be highly considered.

The above comments should also be used for the Environmental Impact Statement prepared for the Special Education Center of Oahu (SECO).

Clifford Y. NoHara
Chief, Traffic Engineering
Mr. Clifford Y. Nohara  
Chief, Traffic Engineering  
Department of Transportation Services  
City and County of Honolulu  
Honolulu, Hawaii  

Dear Mr. Nohara:

Subject: Draft Environmental Impact Statement  
Proposed Variety Club School

This is in response to your letter of May 29, 1975, to the Office of Environmental Quality Control regarding the subject project. Our response is presented after your comment.

Comment: Palekaua and Hakaka Streets are adequate to handle the additional traffic generated under Alternate I. However, Alternate IV would divert over one-half of this traffic to Diamond Head Road, thus lessening the traffic impact on those two streets and should be highly considered.

Response: Table 2 has been revised to show the cost to Variety Club School and the Special Education Center of Oahu. The total cost of Alternate I is estimated at $91,000, while the total cost of Alternate IV is estimated at $134,000. Therefore, it was determined that the cost advantage of Alternate I over Alternate IV outweighed the traffic disadvantage. The attached table as revised will be included as part of the final EIS.

Very truly yours,

HIDEO MURAKAMI  
State Comptroller

Attach.
TABLE 2

ALTERNATE ACCESS COST ESTIMATES

<table>
<thead>
<tr>
<th>Alternate</th>
<th>VCS</th>
<th>SECO</th>
<th>TOTAL</th>
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<td>Alternate II</td>
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<td>Alternate III</td>
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<tr>
<td>Alternate IV</td>
<td>78,000.00*</td>
<td>56,000.00**</td>
<td>134,000.00</td>
</tr>
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</table>

Estimates based on offsite and onsite construction costs for Variety Club School and the Special Education Center of Oahu.

*Cost includes ½ of cost for access road to SECO facilities, chargeable to Variety Club School.

**Cost excludes ½ of cost for access road charged to Variety Club School.

TABLE 3

TRAFFIC COUNT ON PALEKAUA STREET

(7:30 a.m. to 8:00 a.m. on Thursday, April 16, 1975)

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<th>TIME</th>
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</tr>
<tr>
<td>7:55 to 8:00</td>
<td>2</td>
<td>4</td>
</tr>
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</table>

Subtotal      | 9     | 21    |

Total         |       | 30    |
MEMORANDUM

TO: Richard E. Marland
FROM: Doak C. Cox
RE: Review of DEIS for the Variety Club School

The Environmental Center review has been prepared by Blaise Caldeira, Jacquelin Miller, and Claire Shinsato of the Environmental Center.

In general our reviewers have commented favorably on the general adequacy of the DEIS. Specific comments and questions have been made concerning the following:

P. 6, #3. Access

Since it is proposed that access for VCS and the SECO be via Palekaua Street, has parking been considered jointly or separately for each school? It is unclear from figure 2 (p. 3) whether the total number of parking stalls is exclusively for the VCS or a combination of SECO and VCS.

In access Alternate I, is off street parking available? If so, what effect will it have on residential off street parking?

P. 8.

The alternate access map (fig. 5) should be extended to include site plan relationships. It is unclear where the proposed access roads will cross the site. Will access alternate II be along the northern boundary?

P. 18

In Table 2 is the figure of $78,000 for access Alternate IV the total cost of construction? Is VCS and SECO each paying $39,000?
P. 19

Where is the recreational area in relation to access Alternates I, II, III and IV? Will this area be used jointly or separately with SECO?

How will access Alternate IV provide a buffer zone between the school and the residential area?

Has consideration also been given to using the same access road as in access Alternate II with joint parking facilities with SECO?

P. 25, #2. Noise

Will the movement of construction equipment be through residential areas? If so, what will be the impact to those areas?

Having recently reviewed a DEIS for SECO, it seems that both projects will be constructed at approximately the same time. Is this so?

Has consideration been given to excavating both projects simultaneously? This would eliminate having adverse construction impact twice upon the neighborhood.

Since both the VCS and SECO projects are related, it would seem that a single DEIS for both the VCS and SECO would be more appropriate. In any case coordination of grubbing, grading, paving, construction and landscaping would seem environmentally as well as economically more desirable.

[Signature]

Doak C. Cox, Director
Mr. Doak C. Cox
Director
University of Hawaii
Environmental Center
Maile Building 10
2540 Maile Way
Honolulu, Hawaii 96822

Dear Mr. Cox:

Subject: Draft Environmental Impact Statement
Proposed Variety Club School

This is in response to your memorandum of May 30, 1975, to the Office of Environmental Quality Control regarding the subject project. Our response is presented immediately after each comment.

1. Comment: Since it is proposed that access for Variety Club School (VCS) and the Special Education Center of Oahu (SECO) be via Palekaua Street, has parking been considered jointly or separately for each school? It is unclear from Figure 2 (page 3) whether the total number of parking stalls is exclusively for the Variety Club School or a combination of SECO and VCS.

Response: The parking will be separate for the schools. The VCS has 24 parking spaces while SECO and United Cerebral Palsy Association (UCPA) will have 22 and eight parking spaces, respectively. The attached Figure 2 has been revised to reflect the total number of parking spaces available on site. Figure 2 as revised will be included as part of the Final Environmental Impact Statement.

2. Comment: In access Alternate I, is off-street parking available? If so, what effect will it have on residential off-street parking?

Response: Off-street parking is available in access Alternate I. Off-street parking for VCS, SECO and UCPA
staff is not anticipated. Based on one stall per staff member, a total of 41 stalls are required for the three facilities while 54 stalls are provided. If off-street parking is used, the impact on the parking for the residents would be mainly limited to the hours between 7:30 a.m. and 3:00 p.m. when school is in session. During this time period, the demand for parking by the residents is not anticipated to be great.

3. **Comment:** The alternate access map (Figure 5) should be extended to include extra site plan relationship. It is unclear where the proposed access roads will cross the site. Will access Alternate II be along the northern boundary?

**Response:** Additional maps of Figures 5-A, B, C and D have been added to the EIS to include the site plan relationship for the alternates. As can be seen by the attached maps, Alternate II does not follow the northern boundary. These alternate access maps showing the site relationship will be included as part of the final Environmental Impact Statement.

4. **Comment:** In Table 2, is the figure of $78,000 for access Alternate IV the total cost of construction? Are VCS and SECO each paying $39,000?

**Response:** Table 2 has been revised to reflect the total cost of the alternates. As can be seen by the attached Table 2, it is estimated that the total cost of Alternate IV is $134,000 with $78,000 being VCS's share of the cost. These costs as revised will be included as part of the final Environmental Impact Statement.

5. **Comment:** Where is the recreational area in relation to access Alternates I, II, III and IV? Will this area be used jointly or separately with SECO?

**Response:** The attached maps (Figures 5-A, B, C and D) showing the Alternates have the recreation areas for both SECO and VCS located away from the driveway. The maps also show that the recreational areas are physically separated and will not be jointly used.

6. **Comment:** How will access Alternate IV provide a buffer zone between the school and the residential area?
Mr. Doak C. Cox  
Letter No. PM-1346.5  
Page 3

Response: The map showing Alternate IV has the driveway and parking area between the Variety Club School and the residential lots. This map also shows that there is an area available for landscaping between the school and the residential lot immediately adjacent to the site.

7. Comment: Has consideration also been given to using the same access road as in Alternate II with joint parking facilities with SECO?

Response: This option has been considered but due to the irregular configuration of the boundary, it was determined that joint parking facilities with SECO were not desirable. Figure V-3 shows that although there is no joint parking with SECO, the parking facilities are relatively in the same area.

8. Comment: Noise - Will the movement of construction equipment be through residential areas? If so, what will be the impact to these areas?

Response: There will be movement of construction equipment through the residential areas. The final Environmental Impact Statement will include the following statement: "Construction equipment and machinery noise will be audible throughout the construction phase on site as well as from the movement of the equipment through the residential areas."

9. Comment: Having recently reviewed a DEIS for SECO, it seems that both projects will be constructed at approximately the same time. Is this so?

Response: Both the VCS and SECO projects are scheduled for construction at approximately the same time with VCS scheduled for October, 1975, and SECO scheduled for November, 1975.

10. Comment: Has consideration been given to excavating both projects simultaneously? This would eliminate having adverse construction impact twice upon the neighborhood.

Response: All efforts will be made to excavate both projects simultaneously. In any event, all phases of VCS and SECO construction will be coordinated.

11. Comment: Since both the VCS and SECO projects are related, it would seem that a single DEIS for both the VCS and SECO
would be more appropriate. In any case, coordination of grubbing, grading, paving, construction and landscaping would seem environmentally as well as economically more desirable.

Response: Since funding was appropriated for the VCS project but not the SECO project, the contracting for the EIS could only be for the VCS EIS. Coordination of grubbing, grading, paving, construction and landscaping will be done by VCS and SECO. As mentioned in the response to comment No. 10, all phases of VCS and SECO construction will be coordinated.

Very truly yours,

HIDEO MURAKAMI
State Comptroller

Attach.
### TABLE 2

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<td>7:35 to 7:40</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>7:40 to 7:45</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>7:45 to 7:50</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>7:50 to 7:55</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>7:55 to 8:00</td>
<td>2</td>
<td>4</td>
</tr>
</tbody>
</table>

Subtotal       9     21

Total          30
ALTERNATE II
Provide 24' wide road (30-ft. easement) and chain link fence.

New CRM Wall

(NEW chain link fence)

VARIETY CLUB SCHOOL

ALTERNATE II ACCESS MAP

FIGURE 5 - B
VARIETY CLUB SCHOOL

ALTERNATE IV ACCESS MAP

FIGURE 5-D