Mr. Leonard Leong, Chairperson
Environmental Council
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Leong:


I am writing to register this department's concern with the Negative Declaration published in regards to the above referenced project. The environmental assessment document does not appear to meet the requirements or the intent of Chapter 343 HRS.

Pursuant to Section 11-200-9(a) Environmental Impact Statement Rule, this department should have been consulted "to assure thoughtful and deliberate evaluation in determining the significance of various environmental impacts." However, we were not consulted and, therefore, the EA does not address land use compatibility with County plans, or infrastructural impacts.

We wish to note for the record that the negative declaration appears to be based on an incomplete environmental assessment.

Sincerely yours,

[Signature]

BRIAN MISKAЕ
Planning Director

CC Mayor
J. Akana, Hana Advisory
K. Fairbanks
B. Choy
M. Shito...
ENVIRONMENTAL ASSESSMENT
AND NEGATIVE DECLARATION
HANA PUBLIC HOUSING PROJECT
November 29, 1991

A. PROPOSING AGENCY: Hawaii Housing Authority
Department of Human Services

B. APPROVING AGENCY: Hawaii Housing Authority
Department of Human Services

C. AGENCY CONSULTED: County of Maui, Department of Public Works

D. TECHNICAL:
The Hana Public Housing Project is a low income public housing project on approximately thirteen and a half (13.5) acres in Hana, Maui, Hawaii adjacent to Hana Highway near Hana Airport. (TMK 2nd Division 1-03-09:8 & 9, Exhibit 1) This project proposes to construct approximately 50 units in two equal phases, and comprised of a mix of one, two, and three bedrooms units in a multi-family configuration.

This parcel is currently zoned Agriculture, and is located within an agricultural park. The proposing agency plans to proceed with rezoning and redesignation of this parcel for family rental uses. The project is projected to utilize a septic tank system with a leaching field on the existing property. Water service will be provided by the Hana Water Company.

E. ECONOMIC CONSIDERATIONS:
Total cost for this project has been estimated at $7,300,000.00. Funding for this project is being requested by the Department of Housing and Urban Development and the Hawaii State Legislature. Funding for planning, land acquisition, and design has been provided by the Hawaii State Legislature (Act 296, SLH 1991).
Since the property is owned by the Hawaii Housing Authority, the impact on the tax base is expected to be minimal.

F. SOCIAL:

This project will provide new low income public housing for the people of Hana and East Maui. These housing opportunities are needed by the people of Hana and East Maui, as there is a critical shortage of the existing rental housing units. According to a study commissioned by Keola Maui, Inc. and the State Housing Finance and Development Corporation in 1990, 220 individuals and families indicated an interest in affordable housing. This study recommends approximately 55 low income public housing units in Hana. In response, both the State of Hawaii and Hana Ranch have initiated housing projects to address the need for new housing for the people of Hana and East Maui.

G. ENVIRONMENTAL:

1. Flora/Fauna

No rare, threatened, or endangered species of flora or fauna are known to exist on this site. The natural flora of this area are californiagrass, treeferns, guava, hala, kukui, and ohia. A site visit reveals that the flora on site are cultivated nursery stock of ornamental plants used as mother plants for propagation purposes consisting of banyans, areca palms, fragrant dracaena, variegated dracaena, red and pink gingers. Other sporadic plantings that were observed are umbrella trees, vertical weiwel, kukui trees, monkeypod trees, jobs tears, kawa'u, african tulip trees, and alexander palms. The natural fauna of this area consist mainly of upland game birds. A site visit reveals the fauna on site consisting of common birds and insects, along with domestic cattle.

2. Topography

The Hana Public Housing Project is located approximately 300 feet above sea level. (Exhibit 2) The property slopes moderately at approximately 11 percent toward Hana Highway in a northerly direction. There is a system of ditches and three reservoirs that act as silting basins to collect and channel water from adjoining properties.

3. Soils

The Department of Agriculture's Soil and Conservation Service, in cooperation with University of Hawaii Agriculture Extension Station has classified this soil as Malama extremely stony muck. (Exhibit 3 and 4) The soil surface layer is a black muck of approximately 8 inches
thick. The substratum is fragmented Aa lava with a small amount of organic material extending down approximately 24 inches. The amount of organic material decreases with depth. Permeability is very rapid. Runoff is very slow. Erosion hazard is no more than slight. The mean annual soil temperature is 72 degrees Fahrenheit.

4. Historical/Archeological Significance

Currently, the subject site is used as an orchard growing various ornamental flora and cut flowers. Prior to its purchase by the previous owner in 1977, it was used as a pasture. Prior to approximately 1960, parts of the property housed a sugar plantation camp and a railroad. No significant historical or archeological features have been determined within this parcel.

5. Climate

The mean average rainfall in East Maui is between 60 to 90 inches per year. This occurs mostly in the fall and winter. Due to its location on the windward side of the island, the area tends to be fairly moist and lush.

H. NEGATIVE DECLARATION AND DISCUSSION OF THE ASSESSMENT PROCESS:

The following assessments are made to determine whether or not the anticipated effects constitute a "significant effect":

1. The proposed action will not cause irrevocable loss or destruction of any natural or cultural resources.

2. The proposed action will not curtail the range of beneficial uses of the environment.

3. The proposed action will not conflict with the State's long-term environmental policies.

4. The proposed action will not substantially affect the economic and social welfare of the community or State.

5. The proposed action will not involve substantial secondary impacts, such as significant population changes or effects on public facilities.

6. The proposed action will not involve a substantial degradation of environmental quality.

7. The proposed action will not substantially affect any rare, threatened or endangered species of flora or fauna or habitat. No endangered species of flora or fauna are known to exist in the project site.
8. The proposed action will not detrimentally affect air or water quality or ambient noise levels.

9. The proposed action will not be located in any environmentally sensitive area, such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

I. SUMMARY OF MAJOR IMPACTS:

From the above assessment, no major adverse environmental impact is anticipated. The project will result in the following minor adverse impacts:

1. Depletion of labor and material resources for construction.

2. Some dust, noise and silting during construction.

J. ALTERNATIVES CONSIDERED:

1. Alternative Designs

Variations in number and types of units, and in land density have been considered. However, the current proposal is constrained by consideration to the character and nature of the Hana Community and available infrastructure. No significant changes to the proposed housing configuration are anticipated.

2. No Action

The "no action" alternative was considered but was found to be unacceptable, due to the critical need for low income rental units in Hana. This would also not meet HHA's mandate to provide safe and sanitary housing on this available site.

K. PROPOSED MITIGATION MEASURES:

The temporary dust, noise and silting which would occur during construction will be controlled by application of appropriate pollution control measures.

L. DETERMINATION:

It is determined that an Environmental Impact Statement should not be required for this project.
M. FINDINGS AND REASONS SUPPORTING DETERMINATION:

The project site is free of flood, tsunami, erosion, and landslide hazards. No rare or endangered species of flora are known to exist at the site. No rare or endangered species of fauna are known to inhabit the site. There are no recorded archaeological or historical sites within the existing site.

For the reasons cited above, the proposed action will not have any significant effect in the context of Chapter 343, Hawaii Revised Statutes and Section 11-200-12 of the State Administrative Rules.