Mr. Brian J. J. Choy, Director  
Office of Environmental Quality Control  
220 South King Street, 4th Floor  
Honolulu, HI 96813

Dear Mr. Choy:

Subject: Negative Declaration for Palama Elderly Housing Project  
TMK: 1-7-44: 94, 97  
Honolulu, Oahu, Hawaii

The Housing Finance and Development Corporation has reviewed the comments received during the 30-day public comment period which began on October 8, 1993. The agency has determined that this project will not have significant environmental effect and has issued a negative declaration. Please publish this notice in the November 23, 1993 OEQC Bulletin.

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the final Environmental Assessment.

Please contact Mr. Marcel Audant at 587-0548, if you have any questions.

Sincerely,

[Signature]
Joseph K. Cohant  
Executive Director

Encs.
NEGATIVE DECLARATION

PALAMA ELDERLY HOUSING PROJECT

Puuiki and Kawaiiki, Honolulu, Oahu, Hawaii

Prepared in Fulfillment of the Requirements of Chapter 343, Hawaii Revised Statutes and Chapter 200, Title 11, Administrative Rules Department of Health, State of Hawaii

Prepared For
Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Prepared By
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650 Ala Moana, Suite 217
Honolulu, Hawaii 96813

and
Gerald Park Urban Planner
1245 Young Street, Suite 201
Honolulu, Hawaii 96814

November, 1993
### SUMMARY INFORMATION

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<td>LOCATION:</td>
<td>School Street Puuiki and Kawaiiki, Honolulu, Oahu, Hawaii</td>
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<td>TAX MAP KEY:</td>
<td>1-7-44: 94, 97</td>
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<td>LAND AREA:</td>
<td>Parcel 94: 5,218 Square Feet Parcel 97: 8,980 Square Feet</td>
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<td>State of Hawaii</td>
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<td>STATE LAND USE DESIGNATION:</td>
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<td>R-5 Residential</td>
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<tr>
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<td>Temporary Construction Baseyard</td>
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<td>CONTACT PERSON:</td>
<td>Marcel Audant Project Coordinator Housing Finance and Development Corporation State of Hawaii 677 Queen Street, Suite 300 Honolulu, Hawaii 96813 Phone: 587-0548</td>
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Substantive comments received during the Draft Environmental Assessment comment period and design modifications incorporated into the text of the Negative Declaration are printed in bold type. The major design modification is a decrease in the number of dwelling units from 46 to 41.
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SECTION I

DESCRIPTION OF THE PROPOSED PROJECT

The Housing Finance and Development Corporation (HFDC), State of Hawaii proposes to develop a 41-unit multi-family elderly housing complex in Puuiki and Kawailoa, Honolulu, Oahu, Hawaii. The project site is identified as tax map key 1-7-44: 94 and 97 encompassing a land area of 5,218 sf and 8,980 sf respectively. The two lots are owned by the State of Hawaii. A Location Map is shown in Figure 1.

A. Objectives of the Project

Development of the proposed housing complex will aid State and County governments in achieving several public policy objectives. One objective is to commit vacant State land to a more productive use. A second objective is to provide safe, clean, and affordable elderly rental housing in a convenient location and one already serviced by public infrastructure. A third objective is to support City and County objectives for the Palama neighborhood and to undertake improvements consistent with the Palama Neighborhood Revitalization Project.

B. Technical Characteristics

The apartment units are arranged in a single, V-shaped structure to be built on the two lots. One wing of the building faces School Street and the other Old Palama Street. The five-story structure, which measures approximately 52 feet high from ground level to top of roof, will be erected on a poured in place concrete foundation, framed with cement masonry unit exterior walls and metal studs, metal stud interior walls, painted with a textured wall finish, and topped with a standing seam hip metal roof. The building may have be supported on bedrock and drilled casions but this has not yet been determined pending the results of soils and structural analyses.

The building has a gross building area of 38,000 square feet. Dwelling units are single-loaded on each floor typically with 9 units per floor (except the ground floor which has five units). Each floor also includes a 70 square foot common sitting area at the juncture of both wings where residents can sit and "talk story" (See Figures 2 and 3).

The apartment complex consists of thirty-one (31) studio and ten (10) 1-BDR units each equipped with a complete kitchen and bath. The typical studio measures 19' X 22'6" with a floor area of 465 square feet. The 1-BDR units are approximately 19' X 32'6" with a floor area of 618 square feet. In addition to residential quarters, a meeting room with a serving kitchen, a common laundry room, a mail room, secured entry, and manager's office are located on the ground floor. The meeting room can be used by residents for assemblies, social functions, and recreational activities.

An outdoor patio will be built off the meeting room on the School Street side of the building. This area will be enclosed by a 6-foot high wall (for noise attenuation) and fencing and shaded by an overhead trellis. The design intent is to provide an outdoor extension of the meeting room to be used for outdoor functions for the elderly residents.
An interior landscaped courtyard will be built on the ground level facing the rear property line. The courtyard will be furnished with bench seats for passive recreation activities, viewing, and meetings.

Vehicle parking, electrical, mechanical, and storage rooms are located in the basement level. Parking for seventeen vehicles—12 resident and 5 guest stalls—is planned with two of the stalls reserved for the handicapped. Vehicular access will be off Old Palama Street via a single 20' wide ramped two-way driveway. The driveway centerline is established opposite Io Lane about 170 LF from the School Street/Old Palama Street intersection. Access to the basement level parking area will be secured by a roll-up gate.

Water will be brought to the site from an existing 8" main in Old Palama Street. The line will be split into two separate lines for domestic water and fire protection systems. Wastewater will be collected on-site and discharged via a 6-inch lateral into the 36-inch School Street collector sewer. A permanent drainage system will be constructed to collect and convey water off-site into drain inlets at the makai end of Old Palama Street.

Power, communication, and CATV cables will be drawn from existing sources and placed underground from the property line to the building.

C. Economic Characteristics

Construction costs are estimated at $4.8 million ($1993) and State CIP monies for the project have been appropriated by the Hawaii State Legislature. The allocation was appropriated to HHA in 1990; thereafter, the Authority re-delegated the funds to HFDC for construction. Upon completion of the construction of the project, the property and project will be returned to HHA for ownership and management.

The project will be built in one construction phase. Applicant plans to start construction in mid-1994 and complete the job in mid-1995.

All improvements are proposed on lands owned by the State of Hawaii. A sewer easement in favor of the City and County of Honolulu is located along the western property line. Major structural improvements do not encroach into the easement.

Rental rates will vary according to household income. Thirty percent (30%) of tenants monthly adjusted income is proposed for rents with a proposed minimum rent of $200/month for the studio and $250/month for the one-bedroom unit. Future adjustments in monthly rents will be determined by the Hawaii Housing Authority and based on operation and maintenance costs.

D. Social Characteristics

No business enterprise or resident will be displaced by the project. The site is currently under a short-term lease to the general contractor of the Palama Neighborhood Revitalization Project. The contractor uses the property for a temporary construction baseyard.

Three units—2 studios and a 1-BDR—are set aside for rental to the handicapped and all units are handicapped adaptable with some architectural modifications.
SECTION 2
DESCRIPTION OF THE AFFECTED ENVIRONMENT

A. Location and Existing Use

Palama is an old residential neighborhood characterized by old homes, substandard dwellings, small lots, narrow streets, and aged public infrastructure. The project site is located at the intersection of and bordered by School and Old Palama Streets to the north and west respectively, and Lanakila Gardens, a four story multi-family residential development, to the south. Both State of Hawaii parcels are vacant and used as a temporary construction baseyard. A construction office trailer and equipment are located on lot 97; soil, gravel, and sand are stockpiled on lot 94. A 6-foot high chain link fence surrounds both parcels.

B. Climate

Located on the lower slopes of Kapalama Heights, the macroclimate for the area can be characterized as cool and temperate. Rainfall is relatively light averaging about 30 inches a year and temperatures can range from an average seasonal low of 69 degrees F to a high of 85 degrees F. Relative humidity ranges between 56-72 percent. Winds blow from the northeast approximately 60 percent of the year at an average of 11 miles per hour (Park, 1992).

C. Topography

The two parcels are relatively level and slope in the direction of Old Palama Street. The high elevation is about 46 feet along School Street and 40 feet along the rear property line. The property line separating both lots also demarcates a six foot grade change.

D. Soils

The Soil Conservation Service (1972) classifies the soil as Kaena clay (KaB). This is a poorly drained soil with a high-swell potential.

E. Flood Hazard

Flood Insurance Rate Maps (Federal Emergency Management Agency, 1990) designate the two lots Zone X which is defined as "areas determined to be outside the 500-year flood plain."

F. Flora

The lots have been grubbed of vegetation leaving mostly wayside weeds. Morning glory (Ipomea sp.) grows on the chain link fence surrounding the site.

G. Historical Features

No archaeological or cultural features are located on the premises (DLNR, 1988).
H. Land Use Controls

The site is classified Urban on State Land Use District Boundary Maps. Urban lands are under the jurisdiction of the various counties. The City and County of Honolulu Development Plan Land Use Map for the Primary Urban Center general plans the site Residential and it is designated General Improvement District on the Development Plan Public Facilities Map. The improvement district encompasses a large triangular shaped neighborhood bounded by the H-1 Freeway, School Street, Halona Street and Kokea Street (Department of Housing and Community Development, 1988). The Kapalama-Kapalama Heights Zoning Map zones the site R-5 Residential. The Planning Department has pointed out that "the proposed project is located in the Kalihi-Palama Special Area which has a general height limit of 25 feet in accordance with Section 24-2.2 (b) (10) (A) of the DP Special Provisions for the Primary Urban Center".

The site is not located in any County delineated Special District.

I. Acoustical

The acoustical environment in the area of the project is controlled by motor vehicle traffic noise. Qualitatively the area adjacent to the street can be described as "noisy" with motor vehicles on School Street the primary source. Typically, in urban areas noise levels measured in Ldn (Ldn is a Day-Night Average Sound Level noise descriptor) range from 55 to 65 Ldn and are controlled by motor vehicle traffic. Residences which front major roadways are generally exposed to noise levels of 65 Ldn. We gauge noise levels at the project site to be near this upper level especially when large vehicles and buses are passing.

J. Public Facilities

1. Circulation: School Street a major two-lane, two way, east-west collector borders the site to the north. Traffic flow is controlled by traffic signals at Palama and Lanakila Streets on either side of the project site. Recent traffic counts at Palama Street recorded a 24 hour volume of 14,214 vehicles in both directions (Department of Transportation Services, 1991). Townbound traffic is about 1 1/2 times greater than eastbound traffic and daytime traffic volume is twice as much as nighttime traffic.

The 60-foot wide right-of-way of School Street is programmed for widening to 80 feet by the City Department of Transportation Services. Land for the widening will be taken equally from both sides of the street fronting the project site.

The Department of Transportation has proposed that as part of this project Old Palama Street, a two-way, two-lane road, bordering the site to the northwest be converted to a one-way road mauka from Jo Lane to School Street. The makai half of Old Palama Street has been improved as part of the Palama Neighborhood Revitalization Project. The improvements include widening the right-of-way to 24 feet and installing curbs, gutters, and sidewalks on both sides.

2. Water: Water is available from an 8" water main in Old Palama Street.
3. Wastewater: A 36" main in School Street collects wastewater from portions of Liliha, Alewa Heights, Kapalama, and Palama. Wastewater from urban Honolulu is treated at the Sand Island Wastewater Treatment Plant and discharged into the ocean.

4. Solid Waste: The City and County of Honolulu provides curbside refuse collection service for the project area. The site is unoccupied hence there is no present refuse pick-up.

5. Public Safety: Police services in Kalihi-Palama originate from the Kalihi Police Station. Average response time from the station to calls in the service area is five to seven minutes (Department of Housing and Community Development, 1988).

Fire protection service is furnished from the Kalihi Fire Station located on North King Street just ewa of Kalihi Street. Response time from the station to calls in the service area is approximately three minutes (Department of Housing and Community Development, 1988).

6. Power and Communication: Primary power and telephone services are available from overhead lines along School Street and Old Palama Street.

7. Transportation: TheBus, the municipal operated public transportation system, runs in two directions on School Street. Bus stops are conveniently located on School Street fronting the project site for townbound passengers and fronting Lanakila Playground for outbound passengers.
SECTION 3

SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS
AND MEASURES TO MITIGATE ADVERSE EFFECTS

A. Assessment Process

The scope of the project was discussed with staff of the Housing Finance and Development Corporation, Hawaii Housing Authority, the consulting architect, and others comprising the project design team. State and County agencies were consulted for information relative to their jurisdiction, expertise, and areas of concern. Time was spent in the field noting site conditions and conditions in the vicinity of the project site. From the discussions and field investigations, existing conditions and features which could be affected by or affect the project were identified. These influencing conditions are:

- The project site has been modified extensively by its previous use and more recently by its use as a temporary baseward for storing construction equipment and materials;
- The site is devoid of archaeological features;
- There are no threatened or endangered flora and fauna on the premises;
- The site is not within a designated flood hazard area;
- Public utilities are available and adequate to service the proposed use; and
- Traffic on School Street is a primary source of noise.

B. Short-term Impacts

Prior to construction, an office trailer, construction equipment, and stockpiled material at the temporary basinyard will be removed. The property will then be grubbed and rough graded to design elevations. Heavy construction equipment will be used mostly in the beginning 3-4 months of the project construction period. Grubbed materials and construction debris in general will be hauled to an approved site for disposal. The general contractor also will be responsible for general housekeeping of the site and keeping adjacent areas free of mud, sediment, and construction debris.

There is a 6-foot grade change separating the two parcels but because the parcels are relatively flat and small in size erosion is not expected to be significant. Control measures will be specified on a grading plan to be submitted for review and approval by the Department of Public Works.

Fugitive dust will be raised during sitework. Dust cannot be eliminated entirely but can be suppressed by thorough and frequent water sprinkling or by employing other control measures stipulated in Hawaii Administrative Rules, Title 11, Chapter 60 Air Pollution Control.
Construction equipment will emit minor quantities of pollutants in the form of engine exhausts and aldehyde odors. Most large construction equipment are diesel powered and carbon monoxide emissions are generally low but nitrogen dioxide emissions can be quite high. Exhaust fumes and diesel odors will be dispersed by the prevailing winds.

Construction noise will persist for the projected one year construction period. Noise will be most pronounced during sitework and erection of the structure and will diminish as interior work commences. Like fugitive dust, construction noise cannot be avoided and all project activities will comply with the control provisions of Title 11, Administrative Rules of the State Department of Health, Chapter 42 Vehicular Noise Control for Oahu and Chapter 43 Community Noise Control for Oahu.

A portion of the five-story building may have to be supported on drilled casson bearings on the underlying basalt bedrock. This will involve a drill rig which produces only a slight noise from the drill turning into the ground. The drilling and pouring of concrete cassons should take approximately 2-3 weeks.

Equipment noise must be attenuated to meet allowable daytime noise levels (measured at the property line) established for zoning districts (55 dBA for residential districts) by Chapter 42. No construction equipment, power tools, or vehicles which emit noise in excess of the allowable noise levels will be permitted without first obtaining a Noise Permit from the State Department of Health. Although the permit does not attenuate noise per se it regulates the hours during which excessive noise is allowed.

Likewise School, a noise sensitive land use to the west of the project site, is too distant to be adversely affected by general construction noise. The acoustical environment of Lanakila Playground is already conditioned by noise from passing traffic on School and Lanakila Streets and all construction noises will audible in the park.

Should subsurface sites or cultural deposits and artifacts be uncovered, work in the immediate area will cease and historic authorities notified for proper disposition of the finds.

B. Long-term Impacts

The project would house a population of about 70-75 elderly persons. This figure is expected to fluctuate slightly over time depending on household size.

The property is zoned residential (R-5) and multi-family development is not a permitted use in residential zoning districts. Applicant, therefore, will be requesting certain governmental development plan and zoning exemptions to accommodate the proposed development. Although multi-family development on this parcel is contrary to its zoning, existing large properties Diamond Head and Ewa of the project site have been developed for multi-family uses. Thus the proposed development is not a new land use in the neighborhood and can be advocated as a continuing development of multi-family dwellings in the neighborhood.

Considering that the affected parcels are underused, that there is a public need to provide affordable rental housing for the elderly, and that the public infrastructure has the capacity to accommodate the proposed development with some improvements to same to be funded by
applicant, the proposed use attempts to balance collective social, economic, and housing objectives with the desired land use pattern and density for the area.

Neighborhood density will increase but should not result in significant negative externalities such as increased vehicle traffic and residential noise. Housing projects for the elderly are low traffic generators when compared to residential subdivisions or other multi-family housing projects. Trip generation and traffic volume should be negligible because only a few residents are expected to own and operate motor vehicles as this is a central in-town location near an existing senior citizens center and bus stops. Those that do probably will not operate their vehicles daily and would do so primarily during off-peak traffic hours. In addition, vehicle ownership is discouraged by limiting the number of parking stalls. The 12 parking stalls to be provided for residents is based on a 1:4 parking stall/dwelling unit ratio which is consistent with new State funded elderly housing projects.

Being located on a major bus route and having the convenience of a "front-door" bus stop also may deter frequent driving. Public transportation offers certain economic and social benefits to the elderly in comparison to the operating costs of owning private vehicles.

On the other hand there is a negative externality to a School Street location. Existing acoustical quality is poor and residents in the School Street wing may be affected by traffic noise from the street. Certain architectural design elements such as cement masonry unit exterior walls should help to mitigate outside noise. However, the building will not be air conditioned and exterior windows will have to be opened to promote natural ventilation and cooling. The use of window or wall mounted air conditioning may help to resolve this noise versus ventilation dilemma. Air conditioning parts of residences is common in Hawaii but generally speaking may not be a practical option for this project due to funding.

Increases in water consumption, wastewater discharge, and power consumption are to be expected. These consequences are unavoidable but should not tax the respective utility system already serving the project area. Water consumption is estimated at 13,800 gallons per day and can be provided by the existing system. Wastewater flow is projected at 7,400 gallons per day. Wastewater will be discharged into the School Street sewer which has sufficient capacity to accommodate flow from the project.

The elderly should derive social, psychological, and economic benefits from the project. They will have opportunities to interact with their peers, be close to nearby medical facilities, a senior citizens center and reside in clean, comfortable, and affordable living accommodations.

In comparison to the existing vacant parcels, the 5-story building would bring a visual change to low-rise residential development along Old Palama Street (See Figure 4). The V-shaped building has the longer building wing fronting Old Palama Street where most residences are single story single-family dwellings or no more than two levels in height (Pahuala Housing). Dwellings adjacent to the building would be overshadowed by its height and mass. To soften the appearance of the building its front has been set back from the road about 10 feet and in conjunction with the road provides about a 35-45 foot buffer from residences across the street. The building facade has been staggered to add architectural interest and to break up an otherwise monotonous exterior appearance. The hipped roof line also adds visual interest to the building and reinforces the staggered facade. Landscaping along the perimeter of the
development will screen parts of the building from view, soften mass, and accent the overall building design.

The project is expected to have less of a visual impact when viewed from School Street. The height of the building is similar to that of the adjoining Lanakila Gardens and slightly lower than the Hale Po'ali housing project just Ewa of the project site. The proposed project continues a trend of building mid rise housing developments along the makai side of School Street thus the visual impact along this highway corridor should not be that significant.
SECTION 4

ALTERNATIVES TO THE PROPOSED ACTION

A No Action alternative would maintain the status quo of the project site. The potential social and economic benefits of providing safe, secure housing for elderly households on idle land near downtown Honolulu would be foregone. A no action alternative precludes environmental, social, and economic impacts—short and long-term, beneficial and adverse—disclosed in this Assessment.

An alternative design plan would not significantly alter the magnitude of impacts described in this document. A low density development is not economically feasible for applicant.
SECTION 5
CONSULTED AGENCIES AND ORGANIZATIONS

Federal
U.S. Army Corps of Engineers*

State
Department of Health
Department of Human Services
Department of Land and Natural Resources
Hawaii Housing Authority
Office of Environmental Quality Control*

County
Board of Water Supply
Building Department*
Department of Housing and Community Development
Department of Land Utilization
Department of Parks and Recreation
Department of Public Works*
Department of Transportation Services
Department of Wastewater Management*
Planning Department* (fka Department of General Planning)
Police Department*
Fire Department*

Others
Hawaiian Electric Company
Hawaiian Telephone Company
Liliha Neighborhood Board No. 14
Kalāihi-Palama Neighborhood Board No. 15

* Denotes consulted parties who responded in writing.
SECTION 6
DETERMINATION OF SIGNIFICANCE

Chapter 200 (Environmental Impact State Rules) of Title 11, Administrative Rules of the State Department of Health, prescribes criteria for determining whether an action may have significant effects on the environment (11-200-12). The relationship of the proposed project to these criteria is summarized below.

(1) Involves an irrevocable commitment to loss or destruction of any natural or cultural resource:

- The site is devoid of natural or cultural resources.

(2) Curtails the range of beneficial uses of the environment:

- Developing the property for the proposed use provides occupants a convenient in-town location close to nearby medical facilities, a senior citizens center, and bus routes. These convenience factors for elderly residents outweigh any benefits associated with leaving the site vacant and unused.

(3) Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in chapter 344, Hawaii Revised Statutes, and any revisions thereof and amendments thereto, court decisions or executive orders:

- The project does not conflict with the state's long-term environmental policies.

(4) Substantially affects the economic or social welfare of the community or State:

- The project will provide 41 much-needed affordable rental housing units for the elderly. This group will derive social, psychologogical, and economic benefits from residing in the project. They will have the opportunity to interact with their peers and reside in safe, clean, and affordable housing units.

(5) Substantially affects public health:

- Public health will not be substantially affected by the project except by noise and dust generated during construction. These short-term impacts can be mitigated by existing public health regulations.

(6) Involves substantial secondary impacts, such as population changes or effects on public facilities:

- A modest increase in population is anticipated when the 41 units are occupied. This increase is estimated at about 75 persons with fluctuations in population anticipated over time. The development will increase water consumption, wastewater discharge, and power consumption. These consequences are unavoidable but should not tax the respective utility
systems already serving the immediate area. Applicant will upgrade these systems as required to accommodate the housing development.

(7) Involves a substantial degradation of environmental quality;

Environmental quality will not be substantially degraded. The project does not introduce a totally new land use to the immediate area and does not conflict with the desired land use pattern and density for the area. Significant increases in vehicle traffic are not anticipated. Only a few residents are expected to own and operate motor vehicles. Those that do probably will not operate their vehicles daily and would do so primarily during off-peak traffic hours.

The five story structure will bring a visual change to low-rise residential development along Old Palama Street. Dwellings adjacent to the building would be overshadowed by its height and mass. This effect will be mitigated by adhering to building setbacks, staggering the exterior facade of the building to add architectural interest, and landscaping the perimeter of the development to screen parts of the building and soften its mass.

(8) Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;

Adverse cumulative impacts are not anticipated nor does the project involve a commitment for larger actions.

(9) Substantially affects a rare, threatened or endangered species, or its habitat;

There are no rare, threatened or endangered flora and fauna on the premises.

(10) Detrimentally affects air or water quality or ambient noise level; or

Ambient air quality will be affected by dust and combustion emissions but can be controlled by measures described in the Assessment. Construction noise will be most pronounced during site preparation when the site is graded to achieve design elevations and building construction.

(11) Affects an environmentally sensitive area such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

The project is not proposed in an environmentally sensitive area (examples of which are cited in the criterion).
BIBLIOGRAPHY

City and County of Honolulu. Primary Urban Center Development Plan Land Use Map (Ordinance No. 81-79) and Public Facilities Map (Ordinance No. 87-74).

Department of Housing and Community Development, City and County of Honolulu. 1987, 1988 (Amended). Amended Environmental Assessment Palama Neighborhood Revitalization Project.

Department of Land and Natural Resources. 1987. Correspondence to Department of Housing and Community Development.

Department of Land Utilization. Land Use Ordinance. 1990. City and County of Honolulu.


APPENDIX A

COMMENTS AND RESPONSES
Mr. Joseph K. Conant, Executive Director
Department of Budget and Finance
Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Joseph Conant:

Subject: Draft Environmental Assessment for the Palama Elderly Housing Project

Thank you for the opportunity to review the subject document. We do not have any comments to offer.

Sincerely,

[Signature]

Brian J. Choy
Director

cc: Paul Louis and Associates, Inc.
Gerald Fark Urban Planner

Mr. Joseph K. Conant
Executive Director
Housing Finance and Development Corporation
Department of Budget and Finance
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Conant:

This is in response to your request for comments on a Preliminary Environmental Assessment for the Palama Elderly Housing Project. The project will have no significant impact on the operations of the Honolulu Police Department and we have no comments to make at this time.

Thank you for the opportunity to review this document.

Sincerely,

MICHAEL S. NAKAMURA
Chief of Police

SIGNED FOR
SUZANNE UEMURA
Assistant Chief of Police
Administrative Bureau
Mr. Joseph X. Conant  
October 15, 1993  
Page 2

Should you have any questions, please contact Mr. Alex Ho,  
Environmental Engineer, at 524-6150.

Very truly yours,

[Signature]  
Director and Chief Engineer

October 15, 1993

Mr. Joseph X. Conant  
Executive Director  
Housing Finance and Development Corporation  
Department of Budget and Finance  
State of Hawaii  
977 Queen Street, Suite 300  
Honolulu, Hawaii 96813

Dear Mr. Conant:  

Subject: Environmental Assessment (EA)  
Pauoa Elderly Housing Project  

TML: 5-7-44: 14-4-37

We have reviewed the subject EA and have the following comments:

1. The EA should address the potential impact of storm water discharge associated with construction activities on water quality of the receiving waters.

2. The EA should also state what structural or non-structural Best Management Practices (BMP) will be provided to control and reduce discharge of pollutants resulting from construction operations.

3. If dewatering is anticipated during the construction, dewatering permits will be required by the State Department of Health as well as the Department of Public Works, City and County of Honolulu.

4. Since the existing streets are substandard, a traffic study should be conducted to assess the traffic impact as a result of the proposed development.

5. We suggest that a copy of the EA be forwarded to the Department of Waste Water Management for their review and comment.
November 10, 1993

C. Michael Street
Director and Chief Engineer
Department of Public Works
City and County of Honolulu
659 South King Street
Honolulu, Hawaii 96813

Dear Mr. Street:

Subject: Palama Elderly Housing Project
TMIC: 1-7-44: 94 & 97

Thank you for reviewing the preliminary Environmental Assessment for the subject project. We offer the following responses to your comments:

1. Storm water will be discharged into existing drain lines in Old Palama Street and eventually will make its way into the ocean. The drain line already receives storm water discharge from residential, commercial, and public facility use in the immediate neighborhood. Additional discharge is received from areas both within the project area and the receiving waters. The many point and non-point sources and the uncertainty of the quantity and quality of the respective discharges make it very difficult to evaluate and attribute water quality impacts to the proposed project.

2. During construction measures such as stabilized access for vehicle operations and ingress and egress control will be implemented to reduce discharge of pollutants. Grading and erosion control plans will be submitted to the Department of Public Works for review and approval prior to construction. The project will provide paved surfaces such as driveways and sidewalks and all exposed surfaces will be landscaped for long-term pollution discharge control.

3. Dewatering activities are not anticipated during construction.

4. Old Palama Street is being improved as part of the Palama Neighborhood Revitalization Project. The Department of Transportation has recommended and approval will be requested to convert Old Palama Street to a one-way road from 4th Lane to School Street.

5. The Environmental Assessment has been forwarded to the Department of Waste Water Management for review and comment.

C. Michael Street
November 10, 1993

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Should you have any questions concerning the project, please contact Marcel Audet, Project Manager, Housing Finance and Development Corporation, at 587-0044.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

xx: M. Audet, HFDC
October 20, 1993

Department of Budget and Finance
Housing Finance and Development
Corporation
State of Hawaii
367 Queen Street, Suite 300
Honolulu, Hawaii 96813

Gentlemen:

Subject: Preliminary Environmental Assessment
Paliama Elderly Housing Project
TMRC: 1-7-44:94 & 97
Pwoliki and Kauikihi, Honolulu, Hawaii

We have reviewed the subject preliminary assessment and have no comments to offer. Thank you for including us in your preliminary review.

Very truly yours,

HERBERT K. NAKANO
Director and Building Superintendent

cc: J. Narada

October 25, 1993

State of Hawaii
Department of Budget and Finance
Housing Finance and Development Corp.
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Sir:

SUBJECT: Paliama Elderly Housing Project
TMRC: 1-7-44: 94 & 97
Pwoliki and Kauikihi, Honolulu, Oahu, Hawaii

We have reviewed the subject material provided and foresee no adverse impact in Fire Department facilities or services. Fire protection services provided from Kauikihi and Kahului agencies companies with ladder service from Kauikihi are adequate.

Access for fire apparatus, water supply and building construction shall be in conformance to existing codes and standards.

Should you have any questions, please call Assistant Chief Attilio Leonardi of our Administrative Services Bureau at 831-7775.

Sincerely,

DONALD S. M. CHANG
Fire Chief

Akinu
Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Tim Hata of our staff at 237-6070.

Sincerely,

[Signature]

ROBIN FOSTER
Chief Planning Officer

Honorable Joseph K. Conant, Executive Director
Housing Finance and Development Corporation
October 21, 1993

Page 2

Please find attached the Preliminary Environmental Assessment (EA) for the Palama Elderly Housing Project.

In response to your letter of October 6, 1993, we have reviewed the subject EA and offer the following comments:

1. We have no objections to the proposed project.

2. We concur that the proposed project is located on land which is designated Residential on the Primary Urban Center Development Plan (DP) Land Use Map. The proposed project is also located in the Kaliki-Palama Special Area which has a general height limit of 25 feet in accordance with Section 24-2.4(h)(10)(A) of the DP Special Provisions for the Primary Urban Center. We also concur that the proposed project is not permitted under the existing DP land use designation and R-3 zoning district. Therefore, the applicant will have to request exemptions from the DP Land Use Map and applicable zoning ordinances pursuant to Section 201-K, Hawaii Revised Statutes.
October 25, 1993

Mr. Joseph K. Conant, Executive Director
Housing Finance and Development Corporation
Department of Budget and Finance
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Conant:

Subject: Palms Elderly Housing Project
TDC: 1-7-44: 94 & 97
Pauiki and Kaawalii, Honolulu, Oahu, Hawaii

We are responding to your request for our review and comments concerning the Environmental Assessment for the subject project. The existing wastewater facilities are adequate to serve the proposed development, provided that the sewer lateral serving the proposed housing is connected to the existing 36-inch sewer line located in School Street.

Should you have any questions, please contact Thomas Yamazaki at 323-4611.

Very truly yours,

Reneke M. Rappolt
Director

Mr. Joseph K. Conant
Executive Director
State of Hawaii
Department of Budget and Finance
Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Conant:

Thank you for the opportunity to review and comment on the Environmental Assessment for the Palms Elderly Housing Project, Honolulu, Oahu (TDC 1-7-44: 94 and 97). The following comments are provided pursuant to Corps of Engineers authorities to disseminate flood hazard information under the Flood Control Act of 1950 and to issue Department of the Army (DA) permits under the Clean Water Act, the Rivers and Harbors Act of 1899 and the Marine Protection, Research and Sanctuaries Act.

a. The project does not involve work in waters of the U.S.; therefore, a DA permit is not required.

b. The flood hazard information provided on page 6 of the Environmental Assessment is correct.

Sincerely,

Thomas Yamazaki, P.E.
Acting Director
of Engineering