April 19, 1995

Mr. Gary Gill, Director
Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Final Environmental Assessment (EA) for Lihue Theater Elderly Rental Project, TMK: 4:3-06-90, 15,000 Square Ft., Lihue, Kauai, Hawaii

The Kauai County Housing Agency did not receive any comments on the draft environmental assessment for the subject project. We have reviewed the final environmental assessment, and determined that it has no negative impact.

As the reviewing agency, we issue a negative declaration. Please publish the negative declaration notice for this project in the May 8, 1995 OEQC Bulletin.

We have enclosed a completed OEQC Bulletin Publication and four copies of the final EA. Please contact Gary Mackler at the Kauai County Housing Agency, 241-6865, if you have any questions.

Sincerely yours,

Matilda A. Yoshioka
Housing Administrator

Gary Mackler
HOME Program Specialist

GM:gm
encl.

cc: Karen Pearson, HFDC
    Paul Kyno, KHDC

"EQUAL OPPORTUNITY EMPLOYER"
FINAL ENVIRONMENTAL ASSESSMENT
LIHUE THEATER ELDERLY HOUSING PROJECT
LIHUE, KAUAI, HAWAII
FOR
AFFORDABLE ELDERLY RENTAL HOUSING
BY KAUAI HOUSING DEVELOPMENT CORPORATION

REVIEW AGENCY: KAUAI COUNTY HOUSING AGENCY

Prepared by
Gary A. Mackler, HOME Program Specialist
Kauai County Housing Agency
241-6865

April 19, 1995
ENVIRONMENTAL ASSESSMENT
FOR ACTIONS THAT DO NOT REQUIRE AN EIS UNDER NEPA OR LOCAL LEGISLATION

I. 1. Name of Project/Activity: Lihue Theater Elderly Rental Project
    I.D. No.: Pahui Funds
    County of Kauai
    Kauai Housing Agency
    Name of Applicant or Agency
    Name of Applicant or Agency
    County of Kauai Housing Agency
    Head of Agency: (Authorized Signature) CHAD K. TANIGUCHI, Housing Administrator 10/27/94
    (Name, Title, Date)
    Kauai Housing Development Corporation
    Agency or Consultant/Name, Title, Date
    John Frazier, Project Manager 10/27/94

II. DESCRIPTION OF PROPOSED ACTION(S)
1. Single Activity: X; Aggregation of Activities: ; Multi-year Activities: 
   New construction of 20-unit elderly rental complex. Existing facades and lobby area to be
   historically renovated. Project includes meeting, sitting, and activity rooms along with open atrium
   in rear of building. Building will be two-story steel frame construction with elevator.

2. Project Location: 3194 Kuhio Hwy., Lihue, Kauai, Hawaii
3. TMK (Hawaii only): (4) - 3-6-06:930 15,000 Sq. Ft. Location Map Attached: Yes; No
   (see attachment A.

III. ENVIRONMENTAL ASSESSMENT PREPARED FOR COMPLIANCE WITH HUD REQUIREMENTS AND
      ENVIRONMENTAL REVIEW REQUIREMENTS OF OTHER LEVELS OF GOVERNMENT AS FOLLOWS:
1. X State of Hawaii, Supplemental Form EA-S-SOH
2. Guam, Supplemental Form EA-S-Guam
3. Northern Mariana Islands, Supplemental Form EA-S-NMI
4. Trust Territories of the Pacific Islands, Supplemental Form EA-S-TPI
5. American Samoa, Supplemental Form EA-S-ASG

IV. FINDINGS AND CONCLUSIONS RESULTING FROM THE ENVIRONMENTAL REVIEW:
(To be prepared after environmental analysis is completed)
1. ENVIRONMENTAL FINDING:
   X Finding of No Significant Impact on the Environment (FONSI)
   An Environmental Impact Statement is required

2. Agencies/Interested Parties Consulted (Contact Person, Title, Tel. No., Date)
   State Department of Land & Natural Resources - Mr. Tom Tefiler, Endangered Species; Mr. Ron Ribbard,
   State Historic Preservation Office; Mr. Robert Shaw, HUD San Francisco (for propane tank hazards);
   Mr. Hul Gleen, Manager, Department of Water, Mr. Russell Kanoto, The Gas Company; Office of Elderly Affairs;
   John Yukiwura, Mayor, Councilman Keiko Aning
   Alternatives Considered:
   None. Due to present zoning code, parking requirements, an elderly housing project is the only
   type of housing that can be built on the site. A small commercial facility might be built, however,
   NHC is not a commercial developer.

4. Special conditions imposed or actions taken to achieve compliance with HUD, other
   federal authorities or local policies and standards:
   Mitigation will be required for the noise levels from Kohala Highways. Noise only slightly exceeds allowable limits
   and will be incorporated in the design with the help of an acoustics engineer. The propane tank hazard will be
   mitigated by removing and relocating two existing tanks. See attached study (Attachment D). Section 106 of
   Historical Preservation Act will be adhered to.

5. a. FINDING OF NO SIGNIFICANT IMPACT ON THE ENVIRONMENT AND REQUEST FOR RELEASE
     OF FUNDS (Combined Notice)
        (1) Date FONSI/RROF published in local newspaper
        (2) Last day for recipient to receive comments
        (3) Last day for HUD to receive comments
        (4) Date FONSI transmitted to Federal, State, or local governmental agencies
        (5) Date HUD released grant conditions
    b. NEGATIVE DECLARATION (Hawaii only)
        (1) Date Negative Declaration Published in OEOC Bulletin 11/08/94
        (2) Date on which 60 day waiting period expires 1/08/95
        (3) Documentation attached: Yes, No
Check the appropriate column that best describes the project/activity's impact on the environmental component listed.

**Part V**

<table>
<thead>
<tr>
<th>Impact Categories</th>
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<th>3</th>
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<tbody>
<tr>
<td><strong>Land Development</strong></td>
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<tr>
<td>1) Conformance With Complementary Plans and Zoning</td>
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<td>See Attachment B.</td>
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<tr>
<td>2) Compatibility and Urban Impact</td>
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<td>See Attachment B.</td>
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<td>3) Slope</td>
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<td>4) Erosion</td>
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<td>See Attachment B.</td>
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<td>5) Soil Suitability</td>
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<td>See Attachment B.</td>
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<td>6) Hazards and Noise, Including Site Safety</td>
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<td>See Attachment B.</td>
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<td>7) Energy Consumption</td>
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<td>See Attachment B.</td>
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<td><strong>Environmental Design and Historic Values</strong></td>
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<td>8) Visual Quality—Coherence, Diversity, Compatibility Use, and Scale</td>
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<td>See Attachment B.</td>
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<td><strong>Sociocultural</strong></td>
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<td>9) Demographic/Character Changes</td>
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<td>See Attachment B.</td>
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<td>10) Displacement</td>
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<td>X</td>
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<td>See Attachment B.</td>
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<td>11) Employment and Income Patterns</td>
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<td>See Attachment B.</td>
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**Other commentary/discussion:**

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<thead>
<tr>
<th>Community Facilities and Services</th>
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<td>Educational Facilities</td>
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<td>Cultural Facilities</td>
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<td>Transportation</td>
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<td>Natural Features</td>
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<td>Water Resources</td>
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<tr>
<td>Surface Water</td>
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</tbody>
</table>

**SOURCE DOCUMENTATION**
- Agency or other contact:
  - List Name, Title, Tel. No., Date
- Reference Material (Reports, Studies, etc.):
  - List Title, Author, Date
  - Note if it is attached
- Field Observation:
  - Note significant condition(s) that support conclusion of observation

Located in Urban area. Not near any water resources. Source: Field Observation.

No bodies of water nearby. No effect. Source: Field Observation.
### Part VI
**Statutory Checklist/HUD Standards**

Federal statutes, regulations, or executive orders address specific resources that may be impacted by the proposed action. HUD policies and standards address conditions that may require mitigative measures or modifications to the proposed action to achieve compliance with HUD requirements.

Pages 5 and 6 of this form lists those authorities and the implementing regulations or guidelines that must be followed to achieve compliance with the applicable authority. Complete analysis of the proposed action on pages 5 and 6 and enter the determination in column 2 or 3 below.

<table>
<thead>
<tr>
<th>(1) Statutes, Executive Orders &amp; HUD Regulations/Notices</th>
<th>(2) Not Applicable As Certified on Figs. 5 &amp; 6</th>
<th>(3) Compliance Required. Make Reference to and Attach Source Documentation and Analysis to Show Compliance with Applicable Authorities per Part 50.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historic Properties</td>
<td>X</td>
<td>Compliance to Section 106 of the National Historic Preservation Act required. See Section 8, Attachment B, for mitigative measures.</td>
</tr>
<tr>
<td>Floodplain Management</td>
<td>X</td>
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<tr>
<td>Wetlands Protection</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Coastal Zones</td>
<td>X</td>
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<tr>
<td>Endangered Species</td>
<td>X</td>
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<tr>
<td>Farmlands Protection</td>
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<tr>
<td>Air Quality</td>
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<tr>
<td>Water Quality</td>
<td>X</td>
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<tr>
<td>Noise</td>
<td></td>
<td>Noise levels at front four living units are 67 dBA. An acoustical consultant will be part of the design team to add features which will attenuate noise to acceptable levels. 24-hour traffic counts attached.</td>
</tr>
<tr>
<td>Thermal/Explosives</td>
<td></td>
<td>Two nearby propane tanks will have to be relocated. See attached study.</td>
</tr>
<tr>
<td>Airport Clear Zones</td>
<td>X</td>
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<tr>
<td>Solid Waste Disposal</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Toxic Chemicals and Radioactive Waste</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Coastal Barrier Resources</td>
<td></td>
<td>Federal legislation and implementing regulations concerning these resources do not apply to the State of Hawaii, Guam, NMI, TPI or American Samoa as of January 1, 1986.</td>
</tr>
<tr>
<td>Wild and Scenic Rivers</td>
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</table>

Other environmental concerns not addressed under Parts V or VI
The site for the proposed action is not listed nor eligible for listing on the National Register of
Historic Places based on: consultation with the SMPO; information checks with the Federal
Register; local authorities and interest groups; field observation.

X Action is subject to compliance with Section 106 of the National Preservation Act of 1966.

Compliance achieved on (date), document attached.

FLOODPLAIN MANAGEMENT:

X The project/activity is located outside of the 100 year flood hazard area identified by the FHWA or
FHA Flood Hazard Boundary map, panel number 7400000 070200 and not subject to compliance with E.O.
11988.

The proposed action is located within the 100 year floodplain and compliance with E.O. 11988 is
required. Documentation for compliance with the E.O. was completed on (date) and
is attached.

Proposed action requires construction or fill in waters of the U.S. or adjacent wetlands, Department
of Army permit required (Section 404 of the Clean Water Act). Issuance is contingent upon
a federal consistency determination with the local Coastal Zone Management Program.

X Flood insurance required. Policy issued to:


X The proposed action is not within a wetland area nor will it have an adverse impact on an adjacent
wetland area. This determination is made by: X Field observation; consultation with the U.S.
Corps of Engineers; Other: Fish and Wildlife Service marshes of wetland inventory.

The proposed action is located within a wetland and will impact on one nearby. Documentation for
compliance with the E.O. was completed on (date) and is attached.

Proposed action requires fill, a Department of Army Permit is required (Section 404 of the Clean Water Act).
Issuance is contingent upon a consistency determination with the local Coastal Zone Management
Program. Copy of permit is attached.

X Flood insurance required. Policy issued to:

Executive Order 11990; 15 CFR Part 930.

X The proposed action is consistent with the approved Coastal Management Program for the area.
Consistency determination is attached.

X The proposed action will have an impact on the coastal area which required a permit from the
agency/depart ment. The permit was issued on (date) and a copy is attached.


X The proposed action will not affect any endangered species of plants or animals, nor any critical
habitat. This determination was made based on: consultation with U.S. Fish and Wildlife Service (FWS); X consultation with local authori-ty (State Department of Dept/Agency); field observation.

Formal Consultation required with the U.S. FWS under Section 7 (16 U.S.C. 1536). Compliance
achieved on (date); documentation attached.

(Subtitle 1 of the Agriculture and Food Act of 1991).

X The proposed action will not adversely impact prime or unique farmland nor farmlands designated as
important by State and Local Government that have been approved by the Secretary of Agriculture.
This determination was made by: X review of local land use plans; consultation with the
District Conservationist, SCS, USDA; field observation.

The proposed action impacts on agricultural lands however mitigative measures were identified in the
attached analysis in accordance with 7 CFR Part 650. Compliance achieved on (date). Documentation attached.

AIR QUALITY: Clean Air Act (P.L. 90-148) (42 U.S.C. 7401-7462) as amended; applicable EPA implementing
regulations; Volume 1 Guide for Rapid Assessment of Air Quality at Housing Sites by R.H. Thullier, May 1976 and HUD Format #1, Rapid Evaluation Procedure for Carbon Monoxide
Concentrations.

X Project/activity is located within an attainment area in accordance with the State implementation
plan; is not located near a power plant or sugar mill; and is not adjacent to a traffic thoroughfare
that generates CO concentrations in excess of the 0 hour standard of 10 mg/m³ at project site.

Project/activity is located within a non-attainment area and/or is exposed to air pollutants that
threatens the federal air quality standard for (pollutant). Analysis and recommendations for clearance is attached.

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X Project/activity does not impact a safe source aquifer designated by EPA in accordance with Section 1424(e) of the Safe Drinking Water Act of 1974, as amended.

- Project/activity is located within the Northern Groundwater Aquifer on Guam. Guam EPA has reviewed proposal in accordance with MOW between HUD, U.S. EPA, Guam EPA and GUMBA. Their recommendation for clearance is attached. (Activities on Guam only)


- Project/activity is not subject to current or projected noise levels that exceed 65 Ldn as determined by: a site inspection; an evaluation using HUD Noise Assessment Guidelines; or other acoustical data.


THERMAL/EXPLOSIVE HAZARDS: 24 CFR Part 51 Subpart C - Environmental Criteria and Standards; Siting or HUD-Assisted Projects Near Hazardous Operations Handling Petroleum Products or Chemicals of an Explosive or Flammable Nature.

- Project/activity is not subject to hazards from explosive or flammable fuels or other hazardous chemicals based on site inspection and information on file.

X Project/activity is subject to hazards from explosive or flammable fuels or other hazardous chemicals. Evaluation of those hazards and recommended mitigative measures are: X included in attached study. Mitigative measures will be incorporated into project design.


- Project/activity is not located in or near a Clear Zone at a civil or military airfield nor in or near an Accident Potential Zone at a military airfield.

- Project/activity is located within an existing or future Clear Zone or Accident Potential Zone. Approval of proposed action is consistent with Part 51.302, 51.303 and 51.303(b).

Document attached.


X Project/activity does not involve the disposal of hazardous materials nor siting of sanitary landfills or closing of open dumps.

- Project/activity is subject to provisions of EPA Guidelines: Documentation of evaluation and coordination with EPA attached.


X Project/activity is not affected by toxic chemicals or radioactive material based on: Project/ activity's site was suspected of containing toxic chemicals or radioactive materials. HUD and local responsible agency contacted. Evaluation of hazard was made in accordance with Notice 79-33 and found acceptable. Documentation attached. Yes, No.

Grantees are advised not to utilize CDBG funds on activities supporting new development for habitation at locations affected by toxic chemicals and radioactive materials.

Other policies, standards or guidelines used in preparing the environmental analysis

Cumulative Impacts:

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H0-EA86
ENVIRONMENTAL ASSESSMENT
FOR ACTIONS THAT DO NOT REQUIRE AN EIS UNDER NEPA OR LOCAL LEGISLATION

LINEUP THEATER ELDERLY RENTAL PROJECT
IMPACT CATEGORIES

Land Development

1) Site is zoned General Commercial, which allows multifamily projects with a use permit and variance. A project development permit can also be used with a variance. Source documents are County Zoning Map, County General Plan, and State Land Use District map. Contact Mr. Keith Nitta, Planning Department, 241-6677, March 1994.

2) Site is located in a fully developed commercial district. Traffic impact will be minimal due to elderly use and only seven parking stalls. Preference must be given to tenants without cars. Source document is traffic study by Mr. Randall S. Okano, P.E., April 15, 1994, enclosed as Attachment C.

3) Site is flat to slightly sloping, no adverse impact from topography. Source is field observation of on-site and surrounding off-site topography.

4) Site will be 80-90% covered with building and parking. Erosion is not anticipated from on- or off-site. Field observation during heavy storms indicates no erosion. Site plan by Mr. Lloyd Sueda, AIA, dated August 1994 is source for lot coverage.

5) Soils have supported existing steel frame structure. No problems anticipated. New soils test will be made before design of residential units. Source is Mr. Afaq Arwar, Structural Engineer (865-5564), who contributed to the Historic Hawaii Foundation Report dated December 21, 1993, and Mr. Val Peroff, President, SteelTech Construction, December 1993 (487-1465).

6) No hazards or nuisances on site. Two off-site propane tanks require mitigation. Source is field study evaluation by Kauai Housing Development Corporation (245-5977) using HUD Document "Urban Development Siting with Respect to Hazardous Commercial/Industrial Facilities dated April 2, 1982." Consultation with Mr. Frank Johnson, HUD Honolulu; Mr. Robert Shaw, HUD San Francisco; and The Gas Company, Mr. Russell Komoto and Ross Tada (245-3301), October 6, 1994. See attached study (Attachment D) and letter from The Gas Company dated October 19, 1994, Attachment E.

7) The 20 units will easily be serviced with existing power lines and generating equipment. Single phase 50 KVA transformer will be utilized instead of existing transformer. Source is Mr. Carey Koide, Citizens Utilities Engineering (246-4365), October 13, 1994.

Environmental Design and Historic Values

8) Facade will be historically renovated and new construction will be compatible with front. Source is plan by Mr. Lloyd Sueda, AIA, (949-6707), March 26, 1994, and numerous consultations during 1993 and 1994 with Gary Canner, former Historic Preservation Planner, County of Kauai (539-1902). Also noted is the Historic Hawaii Foundation Study dated December 21, 1993, enclosed as Attachment F.
Consultation between Mr. Gary Canner and Ms. Carol Ogata, State Historic Preservation Office on October 26, 1994 indicated that the "adverse effect" can be mitigated by the following actions.

a) **Photo Documentation** - Photo documentation of the interior and exterior of the structure and any significant interior detailing or construction methodology shall be undertaken. These photographs shall be developed with archival quality control methods consisting of 8" x 10" fiberbased black and white paper prints developed from 4" x 5" format fine-grain negatives, and

b) **Statement of Intent** - KHDC intends to work with the various governmental agencies, departments and other interested parties to insure compliance with the Historic Preservation Act. These bodies may include, but are not limited to the Kauai Historic Preservation Commission, Kauai Planning Department, State Historic Preservation Division, Historic Hawaii Foundation, the acting federal agency and the Advisory Council for Historic Preservation.

KHDC intends to fully comply with the above mitigative actions and any other actions required by Section 106 of the Historic Preservation Act.

9) The 20 units will have minimal impact on demographics and character. Conclusion based on the fact that this is a small project with only 19 elderly tenants or couples out of a Kauai elderly (60+) population of 8,877 based on a special tabulation of the 1990 Census data.

10) No displacement will occur as existing building is vacant.

11) The 19 elderly units will not effect employment or income patterns since residents are expected to be mostly retired persons existing on pensions and social security. Source: is discussions and meetings with Virginia Kapali, Office of Elderly Affairs, and the Lihue Senior Citizens group during late 1993 and 1994.

**Community Facilities and Services**

12) An elderly housing project will not generate additional demand on public schools. Some education on items such as nutrition education and other counseling will be conducted on-site but as mentioned below in No. 13), Kauai Economic Opportunity, Eldercare Kauai, and the Office of Elderly Affairs is ready and willing to provide this to the project.

13) The project will add marginally to demand for nearby commercial facilities along Kuhio Highway. Field observation revealed seven restaurants in the immediate area plus a "7-11" convenience store and two gas stations. The Big Save Supermarket along with other shops and offices are also within walking distance.

14) Ample health care facilities exist at nearby Wilcox Hospital, Kauai Medical Group and other health providers in the Lihue area. Tenants will most likely be established Kauai residents who are already receiving medical care at Wilcox Hospital, Kauai Medical Group, and other doctors, dentists and health providers in the Lihue area.

15) Kauai Economic Opportunity (KEO), Eldercare Kauai, and the County of Kauai Office of Elderly Affairs offer social services such as providing meals to homebound residents, nutritional education programs, shopping assistance, in-house personal care and chore services, van and private car transportation. These organizations have been contacted and are quite willing and able to service the project as evidenced by the attached letters. KEO, September 27, 1994, by Mabel Fujiiuchi, Chief Executive Officer; Eldercare Kauai letter dated September 25, 1994 by Charlotte H. Carvalho, Director; and Office of Elderly Affairs, by
Eleanor J. Lloyd. Also Virginia Kapali, of the Office of Elderly Affairs has been consulted extensively (241-6400). (See Attachment G.)

16) Trash pickup by County. Source is Mr. Russell Sugano, Department of Public Works, Roads Division (241-6631), September 14, 1994.


18) Utilize existing storm water system. No change in impact from existing theater structure as exterior watershed area remains almost the same. Source is Mr. Lloyd Sueda AIA (949-6707), April 1994.

19) Water source allocation is currently not available. However, efforts are now being made to change Water Department policy to allocate additional resources for affordable housing projects. Sources are: Mr. Nurl Nielsen, Manager, Water Department (245-6987) October 12, 1994, and Mr. Chad Taniguchi, Housing Administrator (241-6450) October 12, 1994.

20) Police station is 0.4 miles away. Response time is one minute. Police do not anticipate any undue problems as long as some parking is provided. Contact is Lt. Arinto (241-6711), October 14, 1994.

21) Building will have sprinkler system. Fire station is 0.4 miles away. Fire Department seems no problem in servicing the building. They will review and comment on the project sprinkler system when plans are prepared later during the project development process. Source is Mr. Mike Kano, Fire Prevention Officer, Lihue (241-6801).

22) Ambulance service is available from Hanamauu unit. Response time is 5 minutes. Source is Mr. Zack Ocatvio, Manager, Ambulance Service (245-7000) September 14, 1994.

23) Some Open Space will be provided within the complex by an open atrium design and exterior garden space will be available. Source is document plans by Mr. Lloyd Sueda AIA (949-6707), March 26, 1994.

24) Elderly tenants are not expected to have much effect on existing recreational facilities. Field observation indicated no recreational facilities are in the immediate area.

25) Library and museum can easily handle any additional demand. Source is field observation of existing facilities.

26) The Kauai Bus route goes by the Theater. In addition, Senior Bus service and Handivan transportation is available by phone request. The system will not have a problem accommodating the project, according to Mona Louis (241-6420), October 14, 1994. Automobile traffic generated by the project will be minimal. See traffic study by Mr. Randall S. Okaneku, P.E., dated April 15, 1994, Attachment D. A new stop light is currently under design and will be initiated during 1995 (prior to project completion) at Poindiana Street and Kuhio Highway, just adjacent to the project; according to the State Department of Transportation, Kauai Office (241-3461) September 23, 1994. The new light will provide increased safety for vehicular ingress and egress and for pedestrian traffic as well.
24-HOUR TRAFFIC COUNT-STATION SUMMARY

Station No: 22-A  Count Type:  Group:  Old No:
Location: Kuhio Highway at Abuhini Road and Oxford Street

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Note: The table contains data for traffic volumes and time periods for a specific location on Kauai Island, Hawaii.
**State of Hawaii, Department of Transportation, Highways Division**

**ISLAND:** KAUAI  
**STATION DESCRIPTION:** KUKUI HOAIVAY  
**AT ANHUKI ROAD & OXFORD STREET**  
**COUNT GROUP ID:** KUAI  
**ROUTE NO:**  
**M.P.:**  
**COORDINATE ID:** D-02  
**SURVEY DATE:**  
**ASSIGNED DATE:**  
**TC NO:** 223  
**ID NO:** 21-24

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<td>12:30-12:45 1 6 7 6:30-6:45 50 65 115 12:30-12:45 98 118 216 6:30-6:45 53 53 106</td>
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<tr>
<td>12:45-1:00 1 0 1 6:45-7:00 59 67 126 12:45-1:00 89 112 195 7:00-7:15 40 57 77</td>
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<tr>
<td>1:00-1:15 0 0 0 7:00-7:15 61 79 140 1:00-1:15 95 121 216 7:00-7:15 35 42 77</td>
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<tr>
<td>1:45-2:00 1 1 2 7:45-8:00 157 109 245 1:45-2:00 88 98 186 7:45-8:00 32 32 64</td>
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<tr>
<td>2:00-2:15 1 1 2 8:00-8:15 79 125 204 2:00-2:15 112 110 222 8:00-8:15 24 26 50</td>
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<td></td>
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<tr>
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<td></td>
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</tr>
<tr>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2:45-3:00 0 0 0 8:45-9:00 110 102 212 2:45-3:00 102 102 204 8:45-9:00 24 24 48</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3:00-3:15 0 3 2 9:00-9:15 84 71 155 3:00-3:15 73 79 156 9:00-9:15 21 23 44</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>3:15-3:30 0 3 1 9:15-9:30 84 71 164 3:15-3:30 115 81 196 9:15-9:30 16 15 32</td>
<td></td>
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</tr>
<tr>
<td>3:30-3:45 1 3 5 9:30-9:45 78 104 182 3:30-3:45 96 125 221 9:30-9:45 18 20 38</td>
<td></td>
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<td></td>
</tr>
<tr>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4:00-4:15 1 2 3 10:00-10:15 105 108 213 4:00-4:15 107 120 227 10:00-10:15 6 9 15</td>
<td></td>
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</tr>
<tr>
<td>4:15-4:30 2 0 2 10:15-10:30 128 110 238 4:15-4:30 115 126 236 10:15-10:30 13 11 24</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>4:30-4:45 2 3 5 10:30-10:45 100 106 206 4:30-4:45 110 126 236 10:30-10:45 10 9 20</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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<tr>
<td>5:00-5:15 8 15 21 11:00-11:15 84 141 255 5:00-5:15 99 115 214 11:15-11:30 10 11 21</td>
<td></td>
<td></td>
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</tr>
<tr>
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<td></td>
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</tr>
<tr>
<td>5:30-5:45 6 13 13 11:30-11:45 75 114 153 5:30-5:45 72 82 157 11:45-12:00 7 9 16</td>
<td></td>
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</tr>
<tr>
<td>5:45-6:00 19 50 69 11:45-12:00 88 108 128 5:45-6:00 72 86 157 12:00-12:15 3 3 6</td>
<td></td>
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</tr>
</tbody>
</table>

**AA Characters Period (05:45 - 08:30)**

| Nov 4 |
| Nov 8 |
| Total |

**PA Characters Period (13:45 - 16:45)**

| Nov 4 |
| Nov 8 |
| Total |
**Libue Theater Environmental Assessment**

**Propane Gas Tank Hazards near Libue Theater**

and Proposed Mitigation Measures

<table>
<thead>
<tr>
<th>No.</th>
<th>Facility</th>
<th>TMK</th>
<th>Distance from Site</th>
<th>Tank Size (gallons)</th>
<th>Filled Capacity @ 85% (gal)</th>
<th>ASD(1) Blast from Figure 11</th>
<th>Adequate Distance?</th>
<th>Fire Width: <em>Buildings</em></th>
<th>Adequate Distance?</th>
<th>ASD for Fire: <em>People</em></th>
<th>Adequate Distance?</th>
<th>Mitigation Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Da Box Lunch</td>
<td>3-6-08:51</td>
<td>0'</td>
<td>499</td>
<td>442.15</td>
<td>140'(2)</td>
<td>No</td>
<td>41.2'</td>
<td>No</td>
<td>193'</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>Po's Kitchen</td>
<td>3-6-08:89</td>
<td>97.5'</td>
<td>125</td>
<td>165.25</td>
<td>100'(2)</td>
<td>No</td>
<td>20.6'</td>
<td>Yes</td>
<td>108'</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>3</td>
<td>Jack-in-the-Box</td>
<td>3-6-08:88</td>
<td>249'</td>
<td>499</td>
<td>442.15</td>
<td>140'(2)</td>
<td>Yes</td>
<td>41.2'</td>
<td>Yes</td>
<td>193'</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>4</td>
<td>Tip Top Cafe</td>
<td>3-6-08:73</td>
<td>277'</td>
<td>1150</td>
<td>977.5</td>
<td>219'</td>
<td>Yes</td>
<td>62.6'</td>
<td>Yes</td>
<td>275'(3)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>5</td>
<td>Pizza Hut</td>
<td>3-6-14:37</td>
<td>302'</td>
<td>499</td>
<td>442.15</td>
<td>140'(2)</td>
<td>Yes</td>
<td>41.2'</td>
<td>Yes</td>
<td>193'</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>6</td>
<td>KFC</td>
<td>3-6-08:103</td>
<td>349'</td>
<td>1150</td>
<td>977.5</td>
<td>219'</td>
<td>Yes</td>
<td>62.6'</td>
<td>Yes</td>
<td>275'</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>7</td>
<td>McDonald's</td>
<td>3-6-14:37</td>
<td>667'</td>
<td>1150</td>
<td>977.5</td>
<td>219'</td>
<td>Yes</td>
<td>62.6'</td>
<td>Yes</td>
<td>275'</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>8</td>
<td>The Gas Company</td>
<td>3-6-12-23</td>
<td>&gt; 1 mile</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(1) ASD = Acceptable Separation Distance.

(2) For Figure 11, ASD extrapolated for 499 & 125 gallon tanks as chart starts at 1000 gallons.

(3) There are three barriers between this tank and the site if needed for calculation.

**PROPOSED MITIGATION**

The proposed mitigation measure for tanks No. 1 & 2 is to combine them and put them behind the lava rock wall on the south end of the adjacent property located to the south (TMK 3-6-08:89). This wall is 20.67 feet wide and 14.42 average height. The tank would be placed behind the wall at a location 187 feet from the property line. The Gas Company has been consulted on this and says that a 499 gallon tank can service Da Box Lunch Place, Libue Theater Elderly Housing Project and Po's Kitchen. Estimated gas usage in gallons per year is 5,600 for Da Box Lunch Place, 1,700 for Po's, and 2,100 for the Libue Theater. This comes to 883 gallons per month and 158 per week which can be handled by two-week service.

The relocated 499 gallon tank would be placed behind and near the center of the lava rock wall about 187 feet from the Libue Theater property line. The revised ASD is 182.4 feet as shown below using the lava rock wall as a barrier. Thus, the mitigation measure is acceptable.

<table>
<thead>
<tr>
<th>No.</th>
<th>Facility</th>
<th>TMK</th>
<th>Distance from Site</th>
<th>Tank Size (gallons)</th>
<th>Filled Capacity @ 85% (gal)</th>
<th>ASD(1) Blast from Figure 11</th>
<th>Adequate Distance?</th>
<th>Fire Width: <em>Buildings</em></th>
<th>Adequate Distance?</th>
<th>ASD for Fire: <em>People</em></th>
<th>Adequate Distance?</th>
<th>Mitigation Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>182</td>
<td>Relocated</td>
<td>3-6-08:89</td>
<td>187'</td>
<td>499</td>
<td>442.15</td>
<td>140'(2)</td>
<td>Yes</td>
<td>41.2'</td>
<td>Yes</td>
<td>193'</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Continued from above>>>

<table>
<thead>
<tr>
<th>Fire Height: Fire Area:</th>
<th>Determine Exposing Effective Barrier Area</th>
<th>Factor: [.945 X distance]</th>
<th>ADSD: Is actual Further mitigation required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>64.88' W x H 14.42 x 20.67</td>
<td>2,667 SF 298.06 SF</td>
<td>.112</td>
<td>.945 X 182.4' adequate?</td>
</tr>
</tbody>
</table>
October 19, 1994

Kauai Housing Development Corporation
3501 Rice Street
Lihue, Kauai, Hawaii 96766
Attn: Mr. John Frazier

Subject: Propane Tank Relocation and Consolidation for the Lihue theater Elderly Housing Project, Po's Kitchen, and Da Box Lunch Place, Kuhio Highway, Lihue, Kauai.

Dear John:

BHP Gas Company, Kauai Branch, understands that according to HUD guidelines that there are two propane tanks which are closer to the Lihue Theater property than allowed by the guidelines. These tanks are the 499 gallon tank located on the adjacent property to the north which services Da Box Lunch Place, and the 124 gallon tank located on the adjacent property to the south which services Po's Kitchen.

Your proposed solution is to locate one 499 gallon tank at the far south end of the adjacent property to the south (TMK 3-6-86:89) behind an existing lava rock wall. Our calculations show that the Lihue Theater Housing Project, Po's Kitchen and Da Box Lunch Place can be adequately serviced by this one tank by every other week filling. BHP Gas Company finds the consolidation and relocation to be an acceptable solution. Cost of trenching will be the responsibility of Kauai Housing Development Corporation and the pipes themselves will be paid for by BHP Gas Company.

Please feel free to call if you have any questions.

Sincerely,

RUSSELL KOMOTO
Gas Sales Representative
HURRICANE INIKI
TECHNICAL ASSISTANCE REPORT
for
HISTORIC PROPERTIES

RESOURCE:
LIHUE THEATER
TMK: 3-6-06: 90
Date: 21 December 1993

Funded by
Historic Hawai'i Foundation
Project Iniki Program

in cooperation with the
County of Kauai Planning Department
and the
Kauai Historic Preservation Review Commission
REF: HP-AB

Mr. Chad Taniguchi
Housing Administrator
County of Kauai Housing Agency
4193 Hardy Street
Lihue, Hawaii 96766

LOG NO.: 12971
DOC NO.: 9410co12
ARCHITECTURE

Dear Mr. Taniguchi:

SUBJECT: Section 106 Compliance (NHEPA)
Lilue Theater Elderly Rental Project
TMK 3-5-06;90, Lihue, Kauai, Hawaii

Thank you for the letter dated October 13, 1994 regarding the proposed project for the Lihue Theater Elderly Housing. We believe that the building meets the State & National Register criteria for eligibility. We cannot concur with your determination that this project will have "no effect" on the historic character of the site. Because of the existing conditions, we believe that an "adverse effect" can be mitigated through documentation and design, which is compatible or replicates the rear portion of the building. We also need to review plans to insure that the character defining features will be maintained.

The Historic Preservation Division would not require an Environmental Assessment for this project as we have your obligation to comply with Section 106 of the National Historic Preservation Act. We look forward to the completion of the Section 106 process with you.

Thank you for the opportunity to comment. Should you have any questions please call Carol Ogata at 587-0004.

Very truly yours,

KEITH W. AHUÉ, Chairperson and
State Historic Preservation Officer

cc: Paul Kyno
**ARCHITECTURAL ASSESSMENT:**

- PROJECT: Lihue Theater
- ADDRESS: 3194 Kuhio Highway
- TMK: 3-6-06: 90
- SURVEY DATE: Dec. 10, 1993
- REPORT DATE: Dec. 21, 1993
- REPORT BY: Michael Toma, Architect

**BUILDING CHARACTERISTICS**

- APPROX. AGE: Built 1931
- OCCUPANCY: Original use: Movie Theater, Vacant at present
- NO. OF STORIES: Single story (large volume) w/ balcony
- FOUNDATION: Concrete footings
- WALL SYSTEM: Steel Columns with wood stud infill
- ROOF SYSTEM: Wood shingles and plaster exterior finish
- SITE: Steel trusses with wood rafters and purlins
- Tight site with minimal setbacks fronting on Kuhio Highway in Lihue. No parking areas on this lot.

**CONSTRUCTION MATERIAL DESCRIPTION:**

- FOUNDATION: Concrete
- FLOOR: Concrete
- WALL: Wood framing with interior panels
- INTERIOR FINISHES: Acoustical canec type panels, plaster
- CEILING: Perforated acoustical canec and decorative wood grilles
- ROOF: Low slope w/ built up roofing
- PAINT: Poor condition
- PLUMBING: Existing Men and Women Restrooms
- ELECTRICAL: Poor condition
- OTHER: Existing fire sprinkler system

**GENERAL DAMAGE ASSESSMENT:** (55%)

- FOUNDATION: 10%
- FLOORS: 30%
- WALLS: 40%
- INTERIOR FINISHES: 75%
- CEILING: 90%
- ROOF: 90%
COMMENTS:

The Lihue Theater opened on October 3, 1931. Even in its present dilapidated condition, one can imagine some wonderful times for this 800 seat theater. Today, the structure is vacant and has been for many years which is one of the reasons for its state of disrepair.

Its Spanish-baroque plaster facade is typical of the Art Moderne movie houses of its heyday in the 1930's. This building is significant to the history of Kauai and more specifically Lihue for its contribution to the town’s past and center of town presence. This eclectic building is a mix of references from Hollywood of the 30's to Polynesia. The interior detail treatment of painted ceilings and intricate moldings of the ticket lobby and foyer gives the best indication of what once was.

CONSIDERATIONS:

1. A restoration or rehabilitation project for this building would require substantial repairs and new construction. The existing main steel structure seems to be in good condition but the wood members of the roof structure and roofing as well as portions of the existing walls will be replaced. If the siding is deemed to be of historic significance every effort shall be made to preserve it. Reconstruction will require upgrading of certain building components to meet current building codes.
2. The strength of the building is its theater facade and overall scale and proportion. Restoration of the facade would be recommended for any reuse.
3. Parking is a concern for this property and future use needs to address this concern.
4. Restoring the ticket lobby and foyer to its past grandeur would be a major asset and should be considered in any new use.
5. Details and objects, i.e., exit signs, fire hose cabinets, lobby light fixtures, wood ceiling grilles, exterior louvers and water features should be reused or kept for display purposes.
6. New uses that will require new openings should retain the front elevation and limit changes to the side and rear walls. New opening should be done with sensitivity. Existing exterior louver should be maintained if possible.
7. New use should be sympathetic to original use in terms of reusing as many original features as possible.
8. New design should follow the Secretary of the Interior’s Standards for Rehabilitation.
9. Overall general damage assessment is 55%. This is higher than the percentage for structural damage assessment due to damages to interior finishes and systems.
STRUCTURAL ASSESSMENT:

PROJECT:   Lihue Theater
ADDRESS:   3194 Kuhio Highway, Lihue
TMK #:     3-6-06:90

SURVEY DATE:   December 10, 1993
REPORT DATE:   December 21, 1993
REPORT BY:    Afaq Sarwar, SE

FOUNDATION: Concrete Footings.
FLOOR FRAMING: Concrete slab on grade/Wood frame floor
WALL FRAMING: Steel frame with wood frame infill walls w/lumber sheathing
CEILG FRAMING: Wood joists supported by truss bottom chords
ROOF FRAMING: Steel trusses/steel purlins/wood rafters/lumber sheathing
OTHER:

STRUCTURAL SYSTEM DAMAGE ASSESSMENT:

<table>
<thead>
<tr>
<th>Component</th>
<th>Damage %</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOUNDATION</td>
<td>10</td>
</tr>
<tr>
<td>FLOOR FRAMING</td>
<td>30</td>
</tr>
<tr>
<td>WALL FRAMING</td>
<td>30</td>
</tr>
<tr>
<td>CEILG FRAMING</td>
<td>20</td>
</tr>
<tr>
<td>ROOF FRAMING</td>
<td>50</td>
</tr>
<tr>
<td>OTHER</td>
<td></td>
</tr>
</tbody>
</table>

TOTAL: 40 %

COMMENTS:

The primary structural system of the building consisting of steel framing, suffered little apparent damage from hurricane Iniki. The secondary structural elements of the building, consisting of wood frame construction sustained significant damage. The damage to the secondary wood framing elements of the building was concentrated at roof and ceiling level.

The apparent damage to the building structure can be separated into three distinct categories: the damage prior to hurricane Iniki, the damage due to Iniki, and the damage after hurricane.

Some of the structural damage that appears to be the pre-Iniki, includes cracks in concrete footings, chipping and spalling of concrete bases of steel-column, corrosion at steel-columns at bases, and some rot and termite damage to wood framing elements.

The visible damage to the structure due to hurricane Iniki, as stated earlier, is concentrated at roof and ceiling level, and includes damage to roof sheathing, rafters, ceiling joists, and wood frame infill wall panels.

(continues)
STRUCTURAL ASSESSMENT:

PROJECT: Lihue Theater
ADDRESS: 3194 Kuhio Highway, Lihue
TMK #: 3-6-06:90

SURVEY DATE: December 10, 1993
REPORT DATE: December 21, 1993
REPORT BY: Afaq Sarwar, SE

Since the roof and ceiling damage from Iniki has not been repaired, building's interior finishes and structure has been left exposed to the elements. This continuous exposure has caused significant damage to the finishes as well as some damage to the exposed structural elements, including the structure of the stepped wood frame floor for theater seating.

Since the primary structural framing system of the is substantially intact and is in relatively good condition, the repair and rehabilitation of the damaged secondary structural framing system aimed at restoring the building structure appears to be feasible. Due to its age, it is very likely that a detailed analysis of the structure would indicate that the building structure does not conform to the current building code requirements. It is recommended that effort be made to upgrade the structural system of the building to bring it into compliance with the contemporary standards.

The proposed conversion of the building into a two story elderly housing facility contained completely within the shell of the existing building, appears to be feasible from structural point of view. Due to the change of use, occupancy, and building area, it is likely that the building structure will have to be upgraded to bring it into conformity with the current code. It is recommended that all new work added to and within the building be kept structurally independent of the existing structure to minimize the impact on the original building structure. Further, it is strongly recommended that prior to this proposed conversion, detailed measured drawings of the building be prepared. These efforts will facilitate any future endeavor to restore and preserve this historically significant building, as much as possible, in its original form.
September 27, 1994

Mr. Paul G. Kyno  
Executive Director  
Kauai Housing Development Corporation  
3501 Rice Street, Suite 108  
Lihue, HI  96766  

Dear Mr. Kyno:  

Because of the major need for additional elderly housing on Kauai, our organization, Kauai Economic Opportunity (KEO) will gladly support Kauai Housing Development Corporation (KHDC)'s two housing projects. The Lihue Theater Elderly and Joseph Brun Elderly projects will add 48 living units more to Kauai's existing stock of elderly housing, helping to address the island's short supply. The existing elderly housing developments on Kauai have long waiting lists. Some people have been on those lists for years, waiting for housing to come available.

KEO looks forward to providing meals to any homebound residents of these projects in addition to offering nutritional education programs, shopping assistance and other necessary services to the elderly residents.

Thank you,

Mabel Fujuchi  
Chief Executive Officer
September 25, 1994

Mr. Paul Kyno, Executive Director
Kauai Housing Development Corporation
3501 Rice Street, Suite 108
Lihue, Hawaii 96766

Dear Mr. Kyno:

Eldercare Kauai was pleased to hear that Kauai Housing Development Corporation received its primary source funding approval for its Lihue Theatre Elderly and Joseph Brun Elderly Housing Projects from the County Paku' i program. Affordable housing for the elderly is in short supply, particularly in Lihue.

Eldercare Kauai strongly supports these two projects and will accept referrals to assist the residents upon completion of construction and occupancy. Our services include: case management for frail and/or at-risk elderly and their caregivers; counseling; assessments for home delivered meals; and the coordination of in-home assistance such as personal care and chore services.

Thank you for addressing this need within our community.

Sincerely,

Charlotte H. Carvalho, Director
Mr. Paul Kyono, President
Kauai Housing Development Corporation
Pacific Ocean Plaza
3501 Rice Street Suite 108
Lihue, HI 96766

May 9, 1994

Dear Paul:

The Kauai Office of Elderly Affairs is tasked to facilitate a comprehensive and coordinated service delivery system on behalf of older adults in the County of Kauai. We advocate for these services and resources which promote and enhance the preferred quality of life in the older community. Offering the best possible alternatives and choices is the primary goal in order to support aging with quality, dignity and independence.

Choices in housing options are limited on Kauai for the approximately 60% of the older population who reside in rental units, living with family, or as a resident in an institution. In the last 20 years, elderly housing development has been minimal and the need for a housing assessment was indicated in 1992. However, it did not occur and we are now awaiting for the results of a general housing survey to be conducted by the County Housing Agency.

In regards to your proposal to construct an elderly housing apartment complex in the Old Lihue Theater, we can only speculate that it would serve as another alternative resource for those older adults seeking housing. We know that living in Lihue has always been a popular demand but there is no hard data of support as to the type and configuration of such living arrangements. Our basis on-going concerns with the proposed construction are a) the very limited parking spaces available for the tenants of the complex and b) the safety factors associated with the planned driveway.

We are encouraged to see a renewed interest in elderly housing by private developers and the receptiveness displayed to best meet the preferences of the older adult in our island community. We look forward to hearing from you as the proposal makes its way through the various processes.

(Signed)
(Mrs) Eleanor J. Lloyd
County Executive on Aging

cc: Mayor JoAnn Yukimura

"An Equal Opportunity Employer"
LIHUE THEATER SITE
October 1994

Photo No. 1: Front View from the northwest side of Kuhio Highway.
Shows portion to be restored.

Photo No. 2: Front and southside views from intersection of Poinciana Street
and Kuhio Highway.
OTHER ENVIRONMENTAL REVIEW REQUIREMENTS

STATE OF HAWAII

Review each of the rules or standards listed below and check and/or complete the statement that applies. The completion of the form and signature at the bottom will provide evidence that the proposed action is consistent with Hawaii's environmental regulations and standards.

1. Chapter 343 HRS Environmental Impact Statements
3. Title 11, Administrative Rules, State of Hawaii, Department of Health
   a. Chapter 42, Vehicular Noise Control for Oahu
   b. Chapter 43, Community Noise Control for Oahu
   c. Chapter 54, Water Quality Standards
   d. Chapter 55, Water Pollution Control
   e. Chapter 59, Ambient Air Quality Standards
   f. Chapter 60, Air Pollution Control

It has been determined that the proposed action requires compliance with one or more of the above regulations which include:

Appropriate permits for clearance on the above regulations were obtained on __________ (Date).

The proposed action is consistent with the regulations listed above and no permits are required.

Certified By: CHAD K. TANIGUCHI, Housing Administrator
Name/title 10/27/94

Date 10/27/94

Form EA-S-SOH
SCREENING CRITERIA FOR CDBG ASSISTED PROJECT TO CONFIRM ITS CONSISTENCY WITH HCZMP

DESCRIPTION OF PROPOSED ACTION: Conversion of a vacant building into a 20-unit, one-bedroom, rental apartment complex for the elderly.

CRITERIA: This review is based on HUD’s request for a general consistency certification pursuant to 15 CFR Part 930.37 that was approved by the State Department of Planning and Economic Development April 8, 1987.

The State’s CZM policies are reviewed for their applicability to the action proposed under the general consistency certification as follows:

- If none of the policies apply to the proposed action it is consistent with the Hawai’i Coastal Zone Management Program.

- If one or more of the policies are threatened, the grantee shall make an individual consistency review in accordance with Section 205A-22, Chapter 205A, HRS.

DETERMINATION

CZM POLICIES

<table>
<thead>
<tr>
<th>Consistent Ind. Review</th>
<th>CZM Policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>1. SMA PERMIT</td>
</tr>
<tr>
<td></td>
<td>The proposed action qualifies as a minor permit and is not subject to an individual CZM consistency review. Copy of permit is: __attached, ___ in ERR file.</td>
</tr>
<tr>
<td></td>
<td>*** Proposed action is not subject to an individual consistency review. (References 1, 2)</td>
</tr>
<tr>
<td>X</td>
<td>2. LAND USE DISTRICTS</td>
</tr>
<tr>
<td></td>
<td>Proposed action is located in a developed, altered and urban district. It is not in a State Ag, Rural or Conservation Land Use District. (References 1, 3)</td>
</tr>
<tr>
<td>X</td>
<td>3. THREATENED AND ENDANGERED SPECIES AND THEIR HABITAT</td>
</tr>
<tr>
<td></td>
<td>Proposed action does not occur in or affect areas containing threatened or endangered species and their habitats. (References 4, 5, 6)</td>
</tr>
<tr>
<td>X</td>
<td>4. STREAMS</td>
</tr>
<tr>
<td></td>
<td>Proposed action will not alter the flow or use of streams.</td>
</tr>
<tr>
<td></td>
<td>Proposed action is not located adjacent to streams nor will it cause channelization or diversion. (References 4, 7)</td>
</tr>
<tr>
<td></td>
<td>5. HISTORIC/ARCHAEOLOGIC RESOURCES</td>
</tr>
<tr>
<td></td>
<td>The site(s) do does not contain historic or archeological resources as determined by the State Preservation Officer. (References 8, 9) Compliance with Section 106</td>
</tr>
<tr>
<td></td>
<td>6. WETLANDS</td>
</tr>
<tr>
<td></td>
<td>The proposed action does not impact or affect a wetland. (References 4, 7)</td>
</tr>
</tbody>
</table>

REFERENCES

1. County Planning Department
2. Section 205A-22, Chapter 205A HRS
3. State Land Use Commission
4. State Dept. of Land & Natural Resources
5. U.S. Fish and Wildlife Service
6. The Nature Conservancy of Hāna
7. U.S. Corps of Engineers
8. State Historic Preservation Officer
9. National Register of Historic Places (Federal Register)

DETERMINATION

Based on the above review it is determined that:

- The proposed action meets the criteria of the general consistency certification and is consistent with the HZMP.

- X The proposed action requires an individual consistency review that will be prepared and submitted to the State for their review and concurrence.

See Item 5

Prepared by: CHERI K. TANIGUCHI, Housing Administrator 10/27/94

Name Title Date

HO-CZM87
Mr. Chad Taniguchi  
Housing Administrator  
County of Kauai Housing Agency  
4193 Hardy Street  
Lihue, Hawaii  96766

Dear Mr. Taniguchi:

SUBJECT: Section 106 Compliance (NHPA)  
Lihue Theater Elderly Rental Project  
TMK 3-6-06-90, Lihue, Kauai, Hawaii

Thank you for the letter dated October 13, 1994 regarding the proposed project for the Lihue Theater Elderly Housing. We believe that the building meets the State & National Register criteria for eligibility. We cannot concur with your determination that this project will have "no effect" on the historic character of the site. Because of the existing conditions, we believe that an "adverse effect" can be mitigated through documentation and design, which is compatible or replicates the rear portion of the building. We also need to review plans to insure that the character defining features will be maintained.

The Historic Preservation Division would not require an Environmental Assessment for this project as we have your obligation to comply with Section 106, of the National Historic Preservation Act. We look forward to the completion of the Section 106 process with you.

Thank you for the opportunity to comment. Should you have any questions please call Carol Ogata at 587-0004.

Very truly yours,

KEITH W. AHUE, Chairperson and  
State Historic Preservation Officer

CO:ab

c: Paul Kyno
April 17, 1995

Mr. Gary Mackler
Program Specialist
County of Kauai Housing Agency
4193 Hardy Street.
Lihue, HI 96766

RE: Lead Based Paint Requirements (LBP) for
Lihue Theater Elderly Housing Project

Dear Mr. Mackler:

Kauai Housing Development Corporation (KHDC) has completed its lead based paint assessment for the Lihue Theater. Unitek Environmental Consultants, Inc. was engaged to conduct the lead based paint environmental assessment. The results of Unitek's assessment is included in their report dated April 10, 1995 enclosed herewith.

The assessment was conducted using the Atomic Absorption Spectrophotometry (AAS) method. Samples of all interior and exterior paints in and on the theater were taken and sampled in the laboratory. The samples that contained lead were noted and recommendations on mitigation were made. KHDC will use these recommendations as a guideline and will comply with the lead based paint requirements by the following agencies:

1. Occupational Safety and Health Administration (OSHA) based on 29 CFR 1926.62 "Construction Standard".

2. Environmental Protection Agency (EPA) primarily concerned with disposal of LBP wastes exceeding 5 parts per million.

3. Department of Housing and Urban Development (HUD) guidelines regarding the elimination of LBP hazards under regulation 24 CFR 35.

Kauai Housing Development Corporation 3501 Rice St., Suite 108, Lihue, HI 96766, 808 245-5937, FAX 808 245-5954
Please note the Unitek recommendations for abatement strategy includes primarily encapsulation and replacement. If paint removal is deemed necessary due to condition of the substrate, it will be done using a "wet" method wherein lead dust is not created. Dry removal by sanding or scraping is not recommended and will not be used due to the potential of creating lead dust. All necessary monitoring of workers and of the air during removal will be made.

Sincerely,

[Signature]

John H. Frazier
Project Manager

JHF:kl

Enclosure: Unitek Report Dated April 10, 1995
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- Table 2 Lead-Based Paint Summary ............................................... 15

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- Paint Chip Analysis Reports
- LBP-Photographs
SCOPE OF THE ASSESSMENT

Unitek Environmental Consultants, Inc. (UEC) was retained by Kauai Housing Development Corp. to conduct a preliminary environmental assessment, specifically addressing certain features of the Lihue Theatre, TMK 3-6-06:90, Lihue, Kauai, Hawaii.

The purpose of this preliminary survey was to identify the immediate and most recognizable environmental concerns relative to lead-based paints. This survey was not intended to address other environmental issues including, but not limited to, asbestos-containing building materials, hazardous chemicals, hazardous chemical wastes, underground storage tank systems, surface/subsurface contamination, fire/explosion hazards (which would be addressed by an insurance loss control survey), biological concerns (such as disease or infectious waste), public health/safety issues, community/worker right-to-know regulations, radiation hazards, or other environmental regulatory compliance requirements.

This preliminary site survey consisted of interviews with people having a knowledge of the property, review of previous site environmental evaluations, and a visual inspection of the property/facility as it existed on the days of the site visits. This assessment provides an initial screening for potential environmental liability concerning lead-based paint (LBP). It should not be construed as a comprehensive evaluation of all possible environmental impairment associated with the site.

Given the often obscure and elusive nature of hazardous substances and the enormous liabilities they often represent, Unitek will not provide guarantees that negative findings during this preliminary site survey confirm the absence of all environmental contamination or liability. Unitek Environmental Consultants, Inc. expressly disclaims any and all liability for representations, expressed or implied, contained in, or for omissions from this report, or any other written or oral communication transmitted to any party during the course of this survey which might be interpreted as establishing the total extent of all environmental liability present in the subject property/facility.
SOURCES OF INFORMATION

As a matter of necessity, Unitek relies largely on sources of information, such as the client, public records, and interviews, for recognizing potential environmental liabilities at a subject property/facility. Requests for information resources are made to collect relevant data on current and past practices conducted at the subject property/facility. Unitek may not receive all information requested or be able to confirm all information provided during the course of this preliminary site survey. Therefore, Unitek shall not be held responsible for errors, omissions or misrepresentations resulting from missing documentation or from inaccurate information provided by such sources.

Documentation:

Kauai Housing Development Corp., Gary Canner, AIA
Lihue Theatre, Lihue, Kauai, Hawaii, Existing Floor Plan

The following documents were prepared during the course of this assessment and copies are included in the appendix to this report.

Atomic Absorption Spectrophotometry (AAS) Lead in Bulk Paint Samples Report,
Method SW 846-3050-7420; EMSL Analytical; Dated March 30, 1995

Interviews:

The following persons were interviewed during the course of this assessment:

Mr. John Frazier, Kauai Housing Development Corp.
LEAD-BASED PAINT

Observations:

A visual inspection was conducted at the building to identify suspect lead-based paint (LBP) in damaged or deteriorated painted surfaces. Paint chip samples were collected and submitted to EMSL Analytical, an American Industrial Hygiene Association (AIHA) accredited laboratory, for total lead analysis.

Paint Classification:

According to the Department of Housing and Urban Development (HUD) guidelines, paint containing greater than 0.5% lead by weight as determined by laboratory analysis is considered lead-based paint (LBP).

Regulatory Review:

The removal of lead-based paint is presently governed by several regulations. These include federal requirements from OSHA, EPA (Environmental Protection Agency), and HUD. A brief description of each follows:

1. **Occupational Safety and Health Administration (OSHA)**

   OSHA regulations are a set of rules and standards which are provided to protect the health and safety of the worker.

   A. **29 CFR 1926.62 "Construction Standard"**

   This is OSHA's interim final standard which appeared in the May 4, 1993 Federal Register and went into effect July 1, 1993. Mandated by Title X of the Housing Community Development Act of 1992, the standard reduces the permissible exposure limit (PEL) for lead in construction.
from 200 micrograms per cubic meter of air (µg/m³) based on an eight hour time weighted average (TWA) to 50 µg/m³.

Under this standard employers must perform an exposure assessment to determine if any employee is exposed to lead at or above the action level. OSHA requires that employers assume that certain tasks will exceed the PEL until an employee exposure assessment is performed and the employers document that employees are not exposed above the PEL. The tasks that OSHA identified include, but are not limited to, the manual demolition of structures, manual sanding, heat gun applications, and power tool cleaning. Also included is spray painting with lead paint or any task the employee has reason to believe that he or she may be exposed to lead in excess of the PEL and the employer has not performed and exposure assessment.

2. **Environmental Protection Agency (EPA)**

The EPA is primarily concerned with the impact of certain materials on the environment. The EPA is also concerned with the disposal of materials containing or contaminated with lead. To determine whether the materials are contaminated or contain hazardous quantities of lead, the samples must undergo a Toxicity Characteristics Leaching Procedures (TCLP) test. The leached lead concentration in the LBP wastes must exceed 5 parts per million (ppm) to be considered hazardous by EPA standards.

3. **Department of Housing and Urban Development (HUD)**

The Department of Housing and Urban Development amended its guidelines regarding the elimination of hazards due to LBP under their regulation 24 CFR 35 in June 1988. This was done by implementing section 302 of the Lead-Based Paint Poisoning Act in response to recent amendments contained in the Housing and Community Development Act of 1987.
The main change of the act was an interpretation and definition of "applicable surface." HUD now defines an applicable surface as all intact and non-intact painted surfaces. HUD requires that all surfaces be tested with either an x-ray fluorescence analyzer (XRF) or laboratory testing by Atomic Absorption Spectrophotometry (AAS). If XRF test results are in excess of 1.0 mg/cm², it will be considered a positive test and the surface will be classified as a lead-based. Also, in laboratory analysis of paint chips, according to HUD guidelines, paint containing greater than 0.5% lead by weight is considered lead-based.

Abatement Strategies

The goal of lead-based paint abatement is to safely and cost effectively remove interior and exterior paint and reduce potential future exposure to lead dust. Any effort to remove or encapsulate or replace surfaces covered with lead can create lead dust. Lead dust is dangerous to workers and occupants because it is easy to inhale or ingest. It is important to protect workers from the harmful effects of lead dust and ensure occupants are not exposed to unacceptable amounts of lead dust when reoccupying work areas or residences.

Some things which must be taken into consideration for a lead-based paint abatement project include:

1. Selecting the most cost effective removal method available.
2. Relocating or protecting occupants and protecting workers during the project.
3. Selecting acceptable work practices and engineering controls to control and contain dust emissions during abatement.
4. Ensuring detailed post-abatement cleanup is performed.
5. Ensuring reoccupancy does not occur until strict compliance with airborne and residual dust levels is accomplished.

There are three overall strategies which apply to the lead abatement industry. They are as follows:

1. Replacement
2. Encapsulation
3. Paint Removal and Disposal

A brief discussion of the above referenced methods follows:

1. Replacement - This is the removing of components (windows, doors) which are lead-containing and replacing these with lead-free components. Many times it is cost-effective to replace interior and exterior components. This is generally not feasible for walls and ceilings. Some advantages associated with replacement as a response option are:

   A. This method is ideal for major renovation projects.
   B. The replaced components will most likely be more energy efficient.
   C. This method easily allows area to meet post-abatement compliance.
   D. There is no lead residue left on surfaces.

   Some disadvantages of replacement as an abatement strategy include:

   A. A large volume of abatement debris may be generated.
   B. Adjacent surfaces may be damaged.
   C. Reinstallation of facility components may require skilled carpentry. The actual replacement components may be expensive.

2. Encapsulation - A process designed to make existing lead-based paint inaccessible. This is accomplished by sealing the painted surface. This method is ideal for interior and exterior walls, pipes, and trim. This method is best suited for sealing lead-based paint already in good condition. Some advantages of encapsulation as an abatement strategy include:

   A. May protect occupants from exposure to lead for significant periods of time.
   B. Low dust if surface preparation is minimal.
Environmental Assessment at Lihue Theatre  
April 10, 1995; UEC Project No. 8544  
Page 8 of 17

C. May be faster than other methods.

Some disadvantages of encapsulation as an abatement strategy include:

A. May not provide long term protection.
B. Requires routine inspection.
C. May require routine maintenance.
D. Quality installation is critical for durability.

The following materials should never be used as encapsulents:

A. New coat of paint or primer.
B. Paper wall coverings.
C. Contact paper.

3. **Paint Removal** - A process of stripping lead-paint from the surfaces of components. Paint removal can be conducted either on or off the project site. Off-site removal is usually conducted using chemical removing techniques. Some considerations with reference to off-site chemical paint removal include:

A. Quality of finished product desired.
B. Cost of removal, treatment, and reinstallation.
C. Possible damage to components or adjacent surfaces during removal and reinstallation of components.
D. Lead residue remaining on the substrate which can make components difficult to handle and clean.

The major advantages associated with off-site paint removal include:

A. Allows for restoration.
B. Usually a better finished product.

Some disadvantages associated with off-site paint removal include:
A. Lead residue may remain on substrate and be difficult to remove.
B. Damage may occur to adjacent areas during removal and reinstalltion.
C. Swelling of wood may occur.
D. Hardware left on components may be damaged.

On-site paint removal operations are potentially hazardous. The following aspects must be considered when evaluating where paint removal will occur:

A. On-site removal does not require highly skilled labor.
B. Solvent based chemical strippers are flammable.
C. Caustic chemical strippers can cause eye and skin injuries unless used properly. The high pH of caustic strippers may require they be treated as hazardous.

The major advantages associated with on-site paint removal include:

A. A lower level of skilled worker is required to complete what can be a very labor intensive process.
B. Allows for restoration.

Some of the disadvantages associated with on-site paint removal include:

A. High dust levels may be generated, potentially exposing employees to airborne lead.
B. Clearance standard will need to be achieved once abatement is complete.
C. Chemical strippers may be hazardous and require special precautions.
D. On-site paint removal is a highly visible process. Unless qualified and experienced workers are used, the liability may be high.

Health Effects and Sources of Lead Poisoning:
Lead poisoning (plumbism) in adults may result from both occupational and nonoccupational exposures. Potential occupational sources of lead exposure include:

a. Battery Manufacturers  
b. Jewelers  
c. Painters  
d. Pottery Workers  
e. Indoor Target Shooters  
f. Solderers  
g. Welders  
h. Glass/Stained Makers  
i. Construction Workers

Nonoccupational sources of lead exposure include, but are not limited to:

a. Cooking in leaden pots  
b. Inhaling leaded gasoline (tetraethyl lead)  
c. Producing home-distilled wine or moonshine whiskey  
d. Lead from vehicle emissions  
e. Lead from chipping paint  
f. Deleading Operations

For adults, the most common source of lead poisoning is in the inhalation of lead dust. For this reason, the highest risk of lead poisoning in adults is associated with activities that create lead dust (scraping, sanding, etc.). The present Permissible Exposure Limit (PEL), determined by the Occupational Safety and Health Administration (OSHA), is 50 micrograms per cubic meter of air. Workers may not be exposed above this level during an 8 hour work shift.

In children, lead poisoning primarily results from ingesting of inorganic lead particles in a contaminated environment, for example, in an older house (pre, 1978) with flaking or peeling lead paint or outside where lead may be present in the topsoil. In particular, pica, or the abnormal craving for and indiscriminate ingestion of non food items is a frequent factor leading to lead poisoning among children between 18 and 24 months old. Another potential source of
lead poisoning is lead dust which may be brought home on contaminated clothing worn in the workplace.

Survey results:

A total of 36 surfaces in theatre were tested for the presence of lead-based paint. Results are as follows:

<table>
<thead>
<tr>
<th>Sample No.</th>
<th>Description/Location</th>
<th>Results (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Second Floor; Next of Proj. Room Cream Paint on Wall Substrate: Drywall</td>
<td>0.028</td>
</tr>
<tr>
<td>2</td>
<td>Second Floor; Next to Proj. Room Red Paint on Planter Boxes Substrate: Concrete</td>
<td>0.245</td>
</tr>
<tr>
<td>3</td>
<td>Second Floor; Next to Proj. Room Green Paint on Windows Substrate: Wood</td>
<td>0.144</td>
</tr>
<tr>
<td>4</td>
<td>Second Floor; Next to Proj. Room Brown Paint on Windows Substrate: Wood</td>
<td>0.665</td>
</tr>
<tr>
<td>5</td>
<td>Second Floor; Projector Room Green Paint on Wall Substrate: Concrete</td>
<td>11.350</td>
</tr>
<tr>
<td>6</td>
<td>Second Floor; Projector Room Brown Paint on Wall Substrate: Concrete</td>
<td>9.100</td>
</tr>
<tr>
<td>7</td>
<td>Second Floor; Projector Room Black Paint on Electrical Panel Substrate: Steel</td>
<td>0.016</td>
</tr>
<tr>
<td>8</td>
<td>Second Floor; Office Area Green Paint on Wall Substrate: Wood</td>
<td>7.360</td>
</tr>
<tr>
<td>Sample No.</td>
<td>Description/Location</td>
<td>Results (%)</td>
</tr>
<tr>
<td>------------</td>
<td>----------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>9</td>
<td>Second Floor; Office Area&lt;br&gt;Lt. Green Paint on Wall&lt;br&gt;Substrate: Wood</td>
<td>5.700</td>
</tr>
<tr>
<td>10</td>
<td>Second Floor; Office Area&lt;br&gt;Green Paint on Pipe&lt;br&gt;Substrate: Steel</td>
<td>3.900</td>
</tr>
<tr>
<td>12</td>
<td>Mezzanine; Seating Area&lt;br&gt;Dark Brown Paint on Wall&lt;br&gt;Substrate: Wood</td>
<td>0.060</td>
</tr>
<tr>
<td>13</td>
<td>Mezzanine; Seating Area&lt;br&gt;Rust Paint on Wall&lt;br&gt;Substrate: Wood</td>
<td>0.586</td>
</tr>
<tr>
<td>14</td>
<td>Mezzanine; Seating Area&lt;br&gt;Green Paint on Ceiling&lt;br&gt;Substrate: Canick</td>
<td>&lt;0.010</td>
</tr>
<tr>
<td>15</td>
<td>Mezzanine; Seating Area&lt;br&gt;Red/Brown Paint on Floor &amp; Handrails&lt;br&gt;Substrate: Wood</td>
<td>0.095</td>
</tr>
<tr>
<td>16</td>
<td>Mezzanine; Back Stairway&lt;br&gt;Dark Brown Paint on Handrail &amp; Trim&lt;br&gt;Substrate: Wood</td>
<td>0.016</td>
</tr>
<tr>
<td>17</td>
<td>Mezzanine; Back Stairway&lt;br&gt;Black Paint on Handrail&lt;br&gt;Substrate: Steel</td>
<td>0.055</td>
</tr>
<tr>
<td>18</td>
<td>Main Floor Seating Area&lt;br&gt;Brown Paint on Handrail&lt;br&gt;Substrate: Wood</td>
<td>0.012</td>
</tr>
<tr>
<td>19</td>
<td>Exterior of Building; Front Entrance&lt;br&gt;Dark Brown Paint on Wall&lt;br&gt;Substrate: Concrete</td>
<td>5.300</td>
</tr>
<tr>
<td>20</td>
<td>Exterior of Building; Front Entrance&lt;br&gt;Silver Paint on Trim&lt;br&gt;Substrate: Wood</td>
<td>2.680</td>
</tr>
<tr>
<td>Sample No.</td>
<td>Description/Location</td>
<td>Results (%)</td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>21</td>
<td>Exterior of Building; Front Entrance Cream Paint on Wall Substrate: Concrete</td>
<td>1.495</td>
</tr>
<tr>
<td>22</td>
<td>Exterior of Building; Front Entrance Green Paint on Wall (1&quot; Thin Line) Substrate: Concrete</td>
<td>8.750</td>
</tr>
<tr>
<td>23</td>
<td>Exterior of Building; Front Entrance Black Paint on Door and Trim Substrate: Wood</td>
<td>3.100</td>
</tr>
<tr>
<td>24</td>
<td>First Floor; Mens Room, Lobby White Paint on Ceiling Substrate: Wood</td>
<td>0.370</td>
</tr>
<tr>
<td>25</td>
<td>First Floor; Mens Room, Lobby Light Green Paint on Stairs &amp; Trim Substrate: Wood</td>
<td>0.417</td>
</tr>
<tr>
<td>26</td>
<td>First Floor; Ladies Room, Lobby Black Paint on Trim (Crawl Space Access) Substrate: Wood</td>
<td>0.065</td>
</tr>
<tr>
<td>27</td>
<td>First Floor; Mens Room Rust Paint on Door Substrate: Wood</td>
<td>0.965</td>
</tr>
<tr>
<td>28</td>
<td>Exterior Ceiling &amp; Trim; Outside Lobby Multi-Color Paint on Ceiling Substrate: Plaster</td>
<td>0.116</td>
</tr>
<tr>
<td>29</td>
<td>Interior Ceiling &amp; Trim; Lobby White Paint on Ceiling Substrate: Plaster</td>
<td>0.322</td>
</tr>
<tr>
<td>30</td>
<td>First Floor; Ticket Office Cream Paint on Wall Substrate: Wood</td>
<td>1.130</td>
</tr>
<tr>
<td>31</td>
<td>First Floor; Front Office Lt. Brown Paint on Trim Substrate: Wood</td>
<td>0.048</td>
</tr>
<tr>
<td>Sample No.</td>
<td>Description/Location</td>
<td>Results (%)</td>
</tr>
<tr>
<td>------------</td>
<td>----------------------------------------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>32</td>
<td>First Floor; Lobby, Front Wall Dark Brown Paint on Paneling Substrate: Wood</td>
<td>0.332</td>
</tr>
<tr>
<td>33</td>
<td>Exterior Wall Cream Paint on Shingles Substrate: Wood</td>
<td>7.300</td>
</tr>
<tr>
<td>34</td>
<td>Exterior Wall; Piping Cream Paint on Pipe Substrate: Steel</td>
<td>2.580</td>
</tr>
<tr>
<td>35</td>
<td>Exterior Wall Cream Paint on Wall Substrate: Concrete</td>
<td>1.965</td>
</tr>
<tr>
<td>36</td>
<td>Exterior Facia (Front) Gray Paint on Facia Substrate: Concrete</td>
<td>0.512</td>
</tr>
<tr>
<td>37</td>
<td>Exterior; Front Door Gray Paint on Door &amp; Trim Substrate: Wood</td>
<td>2.440</td>
</tr>
</tbody>
</table>

Note: There was no sample no. 11.
SUMMARY

Lead-based paint (>0.5%) which was identified during the survey is summarized in the following table:

<table>
<thead>
<tr>
<th>Sample No.</th>
<th>Photo No.</th>
<th>Description</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>1</td>
<td>Brown Paint; Windows</td>
<td>Replacement</td>
</tr>
<tr>
<td>5</td>
<td>2</td>
<td>Brown Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>6</td>
<td>2</td>
<td>Brown Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>8</td>
<td>3</td>
<td>Green Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>9</td>
<td>3</td>
<td>Lt. Green Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>10</td>
<td>4</td>
<td>Green Paint; Pipe</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>13</td>
<td>5</td>
<td>Rust Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>19</td>
<td>6</td>
<td>Dark Brown Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>20</td>
<td>6</td>
<td>Silver Paint; Trim</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>21</td>
<td>6</td>
<td>Cream Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>22</td>
<td>6</td>
<td>Green Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>23</td>
<td>7</td>
<td>Black Paint; Door &amp; Frame</td>
<td>Replacement</td>
</tr>
<tr>
<td>27</td>
<td>8</td>
<td>Rust Paint; Door</td>
<td>Replacement</td>
</tr>
<tr>
<td>30</td>
<td>9</td>
<td>Cream Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>33</td>
<td>10</td>
<td>Cream Paint; Shingles</td>
<td>Replacement</td>
</tr>
<tr>
<td>34</td>
<td>10</td>
<td>Cream Paint; Pipe</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>35</td>
<td>10</td>
<td>Cream Paint; Wall</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>36</td>
<td>11</td>
<td>Gray Paint; Facia</td>
<td>Encapsulation</td>
</tr>
<tr>
<td>37</td>
<td>12</td>
<td>Gray Paint; Door &amp; Trim</td>
<td>Replacement/Encapsulation</td>
</tr>
</tbody>
</table>

Recommendations:

According to HUD, paint chips which contain greater than 0.5% lead are considered lead-based. UEC has identified several surfaces which are greater than this level. If the
surfaces on which LBP are found could be disturbed by grinding, drilling, or chipping during restoration activities, and will not be removed and disposed of intact, then the LBP should be removed by a qualified lead-based paint abatement contractor prior to restoration operations. Health and safety precautions should be taken, which may include air monitoring, during restoration activities which may generate lead dust.

Any future construction work which involves surfaces which contain lead must be conducted in accordance with 29 CFR 1926.62. Construction includes the demolition or salvage of structures where lead or materials containing lead are present. The standard does not identify a minimum level at which the paint is considered lead-based.