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STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P. O. BOX 119, HONOLULU, HAWAII 96810

LETTER NO. (P)1313.5

OFC. OF ENVIRONMENTAL
QUALITY CONTROL

MAY 1 1995

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

Dear Mr. Gill:

Subject: Negative Declaration for Waialua High School
Cafetorium Expansion/Renovation
TMK 6-7-02:9 and 10

The Department of Accounting and General Services has reviewed the comments received during the 30-day public comment period which began on January 23, 1995. 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 May 23, 1995 OEQC Bulletin.

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the final EA. If there are any questions, please have your staff call Mr. Gary Chong of the Planning Branch at 586-0487.

Very truly yours,

GORDON MATSUOKA
State Public Works Engineer

GC:jk
Attachments

57

1995-05-23-OA-FEA-Waialua High School Cafetorium Expansion/Renovation

MAY 23 1995

FINAL ENVIRONMENTAL ASSESSMENT
(NEGATIVE DECLARATION)
WAIALUA HIGH SCHOOL
CAFETORIUM EXPANSION/RENOVATION
APRIL 24, 1995

A. PROPOSING AGENCY: Department of Accounting and General Services for the Department of Education.

B. APPROVING AGENCY: Not applicable.

C. AGENCY CONSULTED: Department of Education.

D. GENERAL DESCRIPTION OF THE TECHNICAL, SOCIO-ECONOMIC AND ENVIRONMENTAL CHARACTERISTICS:

1. Technical: This project is to construct the expansion and renovation of the cafeteria/multi-purpose dining room and kitchen. The existing cafetorium is 5,260 square feet and the required expansion is approximately 5,466 square feet. Also included in this project are any site improvements, connections to public utilities and easements that might be required as a result of this project.

2. Socio-Economic:

   a. The proposed project will not create sufficient work to substantially impact the economy and welfare of the community and State.

   b. The estimated cost of the project is $2,228,000.

   c. Since the project will be constructed within the existing school campus, no land will be removed from the tax base.

   d. The project will provide the school with a much-needed facility to implement its program in accordance with the Educational Specifications.

3. Environmental:

   a. The project will not create any major long-term environmental impacts.

   b. However, during construction, the air quality may be affected by dust and exhaust emissions and it is anticipated there will be a temporary increase in noise levels.

c. These impacts are expected to be minimal since State and Federal regulations need to be met.

E. SUMMARY DESCRIPTION OF THE AFFECTED ENVIRONMENT, INCLUDING SITE MAPS:

1. The site of the proposed project is located on the school campus (TMK 6-7-02:9 and 10).

2. No habitat of endangered species, flora or fauna are known to exist at the site.

3. No historical, archaeological or cultural sites are known to exist at the site.

4. The site is not in a Special Management Area.

5. The location of the school site and the proposed project are as shown in Figures 1 and 2, respectively.

F. IDENTIFICATION AND SUMMARY OF MAJOR IMPACTS AND ALTERNATIVES CONSIDERED:

1. Major Impacts: The proposed project will not:

a. Involve an irrevocable commitment to loss or destruction of any natural or cultural resources.

b. Curtail the range of beneficial uses of the environment.

c. Conflict with the State's long term environmental policies.

d. Substantially affect the economic or social welfare of the community or State.

e. Involve substantial secondary impacts, such as population changes or effects on public facilities.

f. Involve a substantial degradation of environmental quality.

g. Detrimentally affect air or water quality or ambient noise levels.

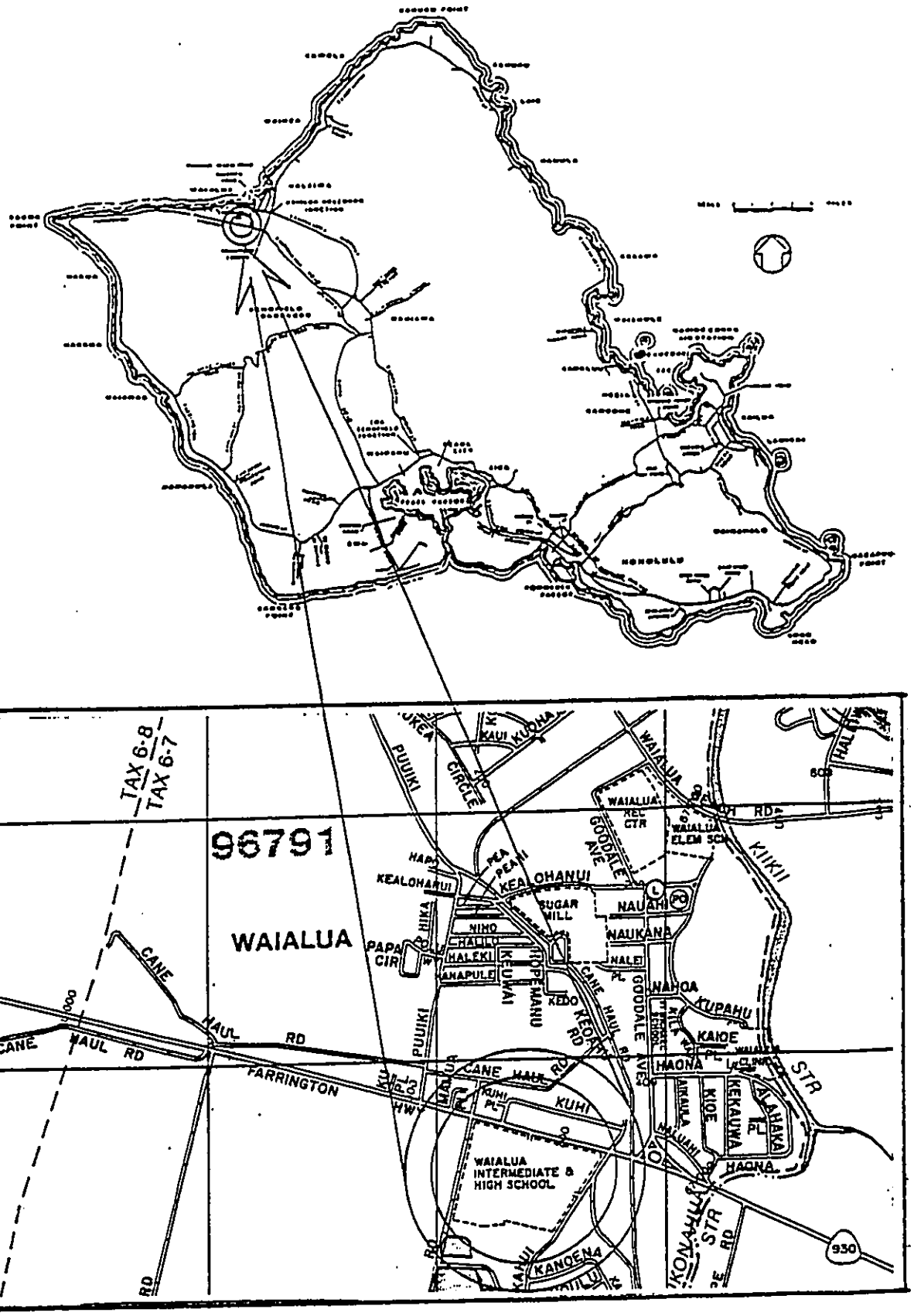
h. Be located in any environmentally sensitive area, such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

2. Alternatives to the Proposed Project: "No action" is not considered to be a viable or desirable alternative.

G. PROPOSED MITIGATION MEASURES: Short term impacts on air and noise quality during construction will be controlled by application of appropriate pollution and noise control measures.

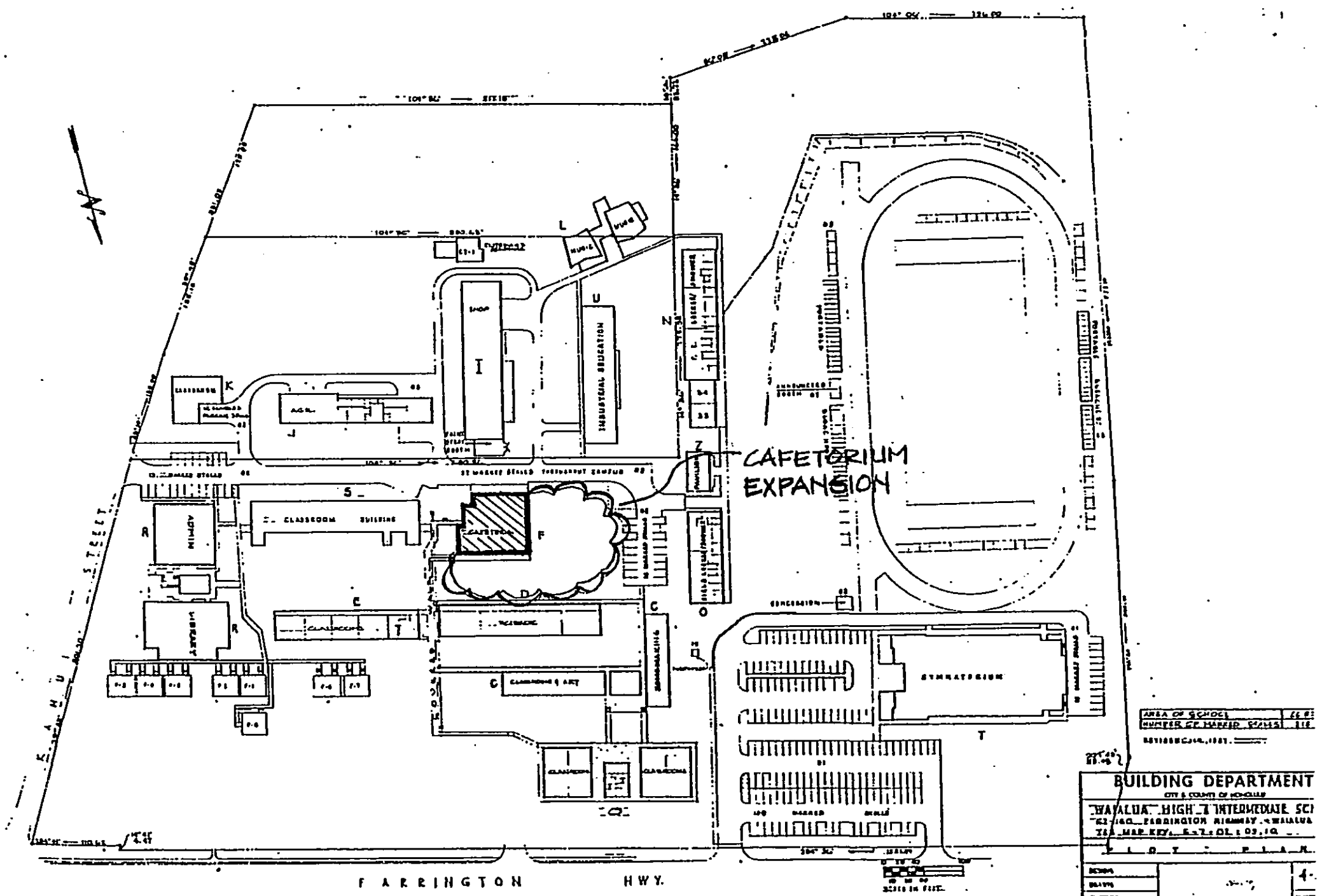
H. DETERMINATION: On the basis of the above assessment, it is concluded that the proposed project will not have a significant adverse impact on the environment.

I. The concern of impact on the environmental, social, cultural, historical and archaeological characteristics from this project brought up by the University of Hawaii Environmental Center is commendable. However, based on our findings, it has been concluded that this project will not have significant permanent adverse impact on the environment (project is located on a developed school site currently used for educational purposes), social or economic welfare of the community or State (project will not create additional jobs), public facilities (facility may be used by the public after school hours on a case by case basis approved by the Department of Education), and public access or right-of-ways (no change in public access or right-of-way due to construction of this project). During construction, historical and/or archaeological sites discovered will be reported to the Department of Land and Natural Resources, State Historic Preservation Division for guidance. It is also noted that background information from the Geographic Information System database (mainly from the City and County of Honolulu) is not currently available for this submittal but will be incorporated in other submittals to OEQC when the information is readily available to DAGS.



LOCATION MAP

FIGURE 1



WAIALUA HIGH AND INTERMEDIATE SCHOOL

FIGURE 2

Morita

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DAGS

University of Hawai'i at Mānoa

Environmental Center
A Unit of Water Resources Research Center
Crawford 317 · 2550 Campus Road · Honolulu, Hawai'i 96822
Telephone: (808) 956-7361 · Facsimile: (808) 956-3980

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Dual Cont. Engr — Post
Leasing Serv. Br.

February 10, 1995
EA: 00106

Mr. Ralph Morita
Department of Accounting and General Services
1151 Punchbowl Street, Room 430
Honolulu, Hawaii 96813

Dear Mr. Morita:

Draft Environmental Assessments (EAs)

Alvah Scott Elementary School Library Expansion and Renovation
Ewa, Oahu

Iroquois Point Elementary School Library Expansion and Renovation
Ewa, Oahu

Kaleiopuu Elementary School New Administration/Library Building
Ewa, Oahu

Kamaile Elementary School New Administration/Library Building
Waianae, Oahu

Kanoelani Elementary School New Administration/Library Building
Ewa, Oahu

Leilehua High School New Library Building
Wahiawa, Oahu

Waialua High School Cafetorium Expansion/Renovation
Waialua, Oahu

Wheeler Elementary School Administration/Library
Expansion and Renovation
Wahiawa, Oahu

Library expansion and renovations for Alvah Scott Elementary is proposed. The library will be expanded from 3,070 square feet to approximately 5,760 square feet. The same is intended for Iroquois Point Elementary School; library expansion will involve an additional 2,995 square feet and the total area of the new library will be about 5,760 square feet. Construction of a new administration/library building measuring approximately 5,760

square feet in area is planned for Kaleiopuu, Kamaile, and Kanoelani Elementary Schools. Construction of a new library of approximately 11,955 square feet plus renovation of existing library spaces is planned for Leilehua High School. The renovation and expansion from 5,260 square feet to approximately 5,466 square feet of Waialua High School's existing cafetorium is proposed. Expansion and renovation of Wheeler Elementary School's administration/Library building is proposed. The existing structure is 4,529 square feet; the proposed expansion is approximately 10,411 square feet. Each project includes any requisite site improvements, connections to public utilities and easements.

We have reviewed the referenced Draft EAs with the assistance of Malia Akutagawa of the Environmental Center. The following are general comments common to all of these documents.

No Accountability

It is improper for the Department of Accounting & General Services for the Department of Education be the applicant as well as the approving agency for this project. There is no accountability inherent in the system.

Purpose of Project

The projects' purpose is vaguely stated to be an implementation of the schools' "program in accordance with the Educational Specifications". There is no explanation as to why these new facilities are "needed". (p. 1)

Inadequate Assessment

The referenced documents are entirely inadequate. Each assessment is five pages long, three with text, and two with maps depicting the location of the schools and work sites. All the documents are virtually identical. The only differences between them are the project descriptions and estimated costs. This indicates that no thought was given to the potential impacts unique to each project and site.

There is no basis for the conclusion that the "project[s] will not have any adverse impact on the environment." (p. 3) No studies have been conducted to verify that there are no endangered species, no historical, archaeological, and cultural sites within the

project area.

Lack of Specificity

What will the "other uses" be with regard to the new construction? (p. 1) Uses need to be specified in order to assess impacts. What are the general construction and design plans for the new facilities? Will safety concerns be addressed adequately? Will land clearing be involved? Is there a risk of increased run-off at least during the construction phase of the project? What are the possible impacts of site improvements? The documents fail to specify any of these concerns.

Alternatives Not Seriously Considered

No good faith effort was made in considering alternatives to the projects. The documents merely state, "No Action is not considered to be a viable or desirable alternative." (p. 3)

Conclusion

We recognize the importance of providing Hawaii's children with educational facilities. However, all proposed developments are subject to environmental scrutiny under Chapter 343 of the Hawaii Revised Statutes (HRS). We recommend that the Final EAs address the above questions and issues so that a proper examination can be made regarding environmental, social, cultural, historical, and archaeological impacts characteristic of each project and site. If the impacts are deemed significant then, under Section 11-100-12 of the Hawaii Administrative Rules (HAR), the preparation of an Environmental Impact Statement (EIS) is required.

Thank you for the opportunity to review these Draft EAs.

Sincerely,

John T. Harrison
Environmental Coordinator

cc: OEQC
Roger Fujioka
Malia Akutagawa

MAR 6 1995

Mr. John T. Harrison
Environmental Coordinator
University of Hawaii
Environmental Center
Crawford Hall, Room 317
2550 Campus Road
Honolulu, Hawaii 96822

Dear Mr. Crawford:

Subject: Draft Environmental Assessments for Various School Projects on Oahu and Hawaii

The following comments are provided in response to your February 10, 1995 letters on the Environmental Assessment (EA) documents for school projects at Alvah Scott Elementary (library), Iroquois Point Elementary (library), Kaleiopuu Elementary (administration/library), Kamaile Elementary (administration/library), Kanoelani Elementary (administration/library), Leilehua High (library), Waialua High (cafeteria), Wheeler Elementary (administration/library), Keonepoko Elementary (cafeteria), Mountain View Elementary (twelve classroom building and cafeteria), and Waiakea High (administration):

1. No accountability:

   A. In accordance with legislative CIP appropriations for school facilities:

      (1) The Department of Accounting and General Services (DAGS) is the "expending" agency. This means that only DAGS can execute the contracts for required work (planning, land acquisition, design, construction, and equipment) and process payments for the school projects with the available CIP appropriations (subject to the Department of Education (DOE) authorizations and allotment by the Department of Budget of Finance (B&F)).

(2) The DOE is the "user" agency. This means the DOE is responsible for:

(a) Establishing the project scope, justification, and needs;

(b) Developing and submitting the legislative appropriation requests;

(c) Authorizing initiation of the project and requests for all CIP funding available under the DOE budget;

(d) Taking control and operations of the school facilities <u>after</u> completion of construction work done under DAGS contracts as the "expending" agency.

NOTE: Therefore, school projects are listed under the DOE budget (Item G) with DAGS as the "expending" agency instead of under the DAGS budget (Item K) in the legislative CIP appropriations.

B. An environmental assessment is developed for a school project <u>after</u> the DOE submits a written request to DAGS for project initiation. DAGS is then responsible for getting an allotment of the appropriated funds from B&F and executing contracts for required work.

C. It is noted that pursuant to subsequent discussions with the OEQC staff on the issue of "approving" agency, the following determinations were reached:

(1) Chapter 343 requirements for EA documents are different from EIS requirements where "approving" agency for State projects is required to be the "Governor, c/o OEQC."

(2) However, the EA documents submitted by DAGS for the subject projects are acceptable because they are for "agency" actions which do not require any other approvals.

(3) Therefore, the final EA documents can leave the "approving" agency on the OEQC form blank.

D. DAGS will delete any further references to "approving" agency in the EA documents.

2. Purpose of project:

A. There is a statewide guideline developed by the DOE in 1984 (approved by the Board of Education, B&F, and the Governor) for physical requirements at typical elementary, intermediate, and high schools called the "Educational Specifications for School Facilities" (EDSPEC).

B. The EDSPEC is used:

(1) By the DOE to determine the total number and size of classrooms and support facilities (administration building, library, cafeteria, etc.) based on the DOE's regional population projections and design enrollment for a specific school;

(2) As justification for DOE appropriation requests on school projects (based on the need for compliance with the EDSPEC).

C. However, because of annual legislative appropriation constraints, the DOE budget can only support incremental development of school facilities. The first increment of school facilities usually includes mass grading, on site infrastructure improvements, some classrooms and limited support facilities. Subsequent school increments are then done according to the DOE's schedule for the school's student enrollment.

D. Therefore, the need for additional classrooms, administration building, library, and/or cafeteria at the respective schools has already been justified by the DOE (as approved by the Legislature with the project appropriation) prior to publication of the EA document.

3. Inadequate assessment:

   A. The subject projects are for new facilities at an existing school. Therefore, potential impacts were previously addressed when the respective schools were first planned, the school site was selected, and the first increment school facilities were constructed.

   B. Subsequent school increments on a developed site such as an existing school facility are not expected to have adverse impacts on endangered species, historical, archaeological, and cultural sites because such concerns would have already been identified and mitigation measures completed for the existing schools to currently operate. Therefore, no additional site investigations were done for the subject EA documents.

   C. However, it is noted that an archaeological survey under the guidance of the Department of Land and Natural Resources, State Historic Preservation Division, will be conducted on the construction site if any historical artifacts are uncovered during the project excavation work.

4. Lack of specifics:

   A. The Environmental Center's concerns on "other uses" seem to be the result of the following statement in the EA documents:

      "This project also includes any site improvements, connections to public utilities and easements that may be required as a result of this project."

   B. It is noted the project design documents will comply with applicable laws, regulations, codes and ordinances and takes all the EA comments provided into consideration. However, specific details and/or parameters are not available at the time of the EA document publication because the design documents are usually developed after compilation of all the EA comments. As an example, mitigation measures for such things as increased surface runoff will be addressed during the design phase as part of compliance with

building code and/or Department of Health requirements. However, actual details on how it is to be done are not available until after completion of the design document.

C. The subject EA documents were submitted to the OEQC for publication to notify the public and other governmental agencies that State projects on existing school sites are forthcoming and to solicit general concerns about the proposed project scope that can be addressed during development of the project design documents (not to solicit comments on the project design details or parameters). If the comments are extensive, then an environmental impact statement (EIS) document will be considered for the subject project prior to implementation.

5. Alternatives not seriously considered:

A. The EDSPEC determines what is needed for school facilities. Therefore, DAGS knows of no "other viable or desirable alternatives" for the subject school projects.

B. It is also noted that "other viable or desirable alternatives" need approval from the DOE and/or the Board of Education and/or B&F and/or the Governor prior to DAGS' implementation.

If there are any questions, please have your staff contact Mr. Ralph Morita of the Public Works at 586-0486.

Very truly yours,

GORDON MATSUOKA
State Public Works Engineer

RM:jy
cc: Mr. Al Suga, DOE w/attachment copy of UHM letters
OEQC w/o attachments