MEMORANDUM

TO: Gary Gill, Director
Office of Environmental Quality Control

FROM: Michael D. Wilson, Chairperson
Department of Land and Natural Resources

SUBJECT: Negative Declaration for the Relocation of Electrical Distribution Lines at Laupahoehoe, Hawaii

The Department of Land and Natural Resources has reviewed the comments received during the 30-day public comment period which began on January 23, 1996. We have determined that this project will not have significant environmental effect and have issued a negative declaration. Please publish this notice in the OEQC Bulletin as soon as possible.

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the final EA. Please contact Cathy Tilton of our Planning Branch at 587-0377, if you have any questions.

Enclosure
FINAL ENVIRONMENTAL ASSESSMENT
AND
NEGATIVE DECLARATION

For
RELOCATION OF ELECTRICAL DISTRIBUTION LINES
AT LAUPAHOEHOE, HAWAII

March 15, 1996

APPLICANT:

Hawaii Electric Light Company, Inc. (HELCO)
PO Box 1027
Hilo, HI 96721-1027

APPROVING AGENCY:

Office of Conservation and Environmental Affairs
Department of Land and Natural Resources
1151 Punchbowl St.
Honolulu, Hawaii 96813
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FIGURE 1. LOCATION OF PROJECT AREA ON ISLAND OF HAWAII

FIGURE 2. LOCATION OF PROJECT AREA ON QUADRANGLE MAP

FIGURE 3. AREA PLAN ON TAX MAP, PLAT 3-6-2

FIGURE 4. CONSTRUCTION PLAN
FIGURE 1. Location of project site on the Island of Hawaii.
FIGURE 2. Location of project site on Quadrangle Map.
FIGURE 3. Area plan on tax map, plat 3-6-2.
OVERSIZED DRAWING/MAP

PLEASE SEE 35MM ROLL

DD48 G
I. APPLICANT

Hawaii Electric Light Company, Inc. (HELCO)
PO Box 1027
Hilo, HI 96721-1027

II. APPROVING AGENCY

Office of Conservation and Environmental Affairs
Department of Land and Natural Resources
State of Hawaii

III. AGENCIES CONSULTED

County of Hawaii Department of Public Works
County of Hawaii Planning Department
State Historic Preservation Office
IV. GENERAL DESCRIPTION OF THE ACTION'S TECHNICAL, ECONOMIC, SOCIAL, AND ENVIRONMENTAL CHARACTERISTICS

A. Technical Description

The project area is within Laupahoehoe Valley, North Hilo District, TMK plat 3-6-2 (Figures 1, 2 and 3).

1.) Purpose and Objectives of Proposed Action

The goal of the proposed action is to relocate electrical distribution lines into publicly-owned right-of-ways along county roads where truck access can be obtained for maintenance purposes.

Current locations of some poles and conductors are inaccessible by truck. Currently, vegetation may grow into conductors undetected and could result in unsafe conditions. Maintenance of vegetation under these conductors occasionally requires extensive tree removal through a swath of vegetation.

The proposed action would improve efficiency and reduce the cost of future maintenance of the distribution line. Improved maintenance would include effective trimming of vegetation around poles and conductors. Furthermore, the proposed alignment would be within the county road easement in which the vegetation is already being maintained, requiring minimal tree trimming by HELCO in the future.

Improved access would also facilitate routine or emergency repairs that may be necessary to maintain reliable service.

The proposed action would also remove poles and conductors from private land where currently no easements exist.
(2.) Description of Construction

The above objectives would be accomplished by a combination of changes to equipment within existing alignments, placement of some poles and conductors in a new alignment and removal of some poles and conductors from portions of the existing alignment that are outside public easements. Following is a detailed description of the construction activities that are proposed (Figures 3 and 4).

The following description follows the primary distribution line alignment from the junction with transmission lines at Tower 38 along Hawaii Belt Highway to the proposed terminus of the project at a junction with existing primary lines at Laupahoehoe Point Road. See Figure 4 for pole numbers and construction details. In following narrative, POLE (written in all caps) refers to numbered pole positions on Figure 4.

1) Shorten the existing span reaching to the valley floor. Existing Conductors extend to POLE P-38-1 and P-38-1L deep within parcel TMK 3-6-2-11. Proposed Action is to shorten this span so that it ends at the Old Government Main Road easement bordering TMK 3-6-2:11.

2) Install two 60-foot poles as POLES P-2 and P-2X within Old Government Main Road easement. This double-pole configuration would anchor the span as it reaches the valley floor.

3) Install 45-foot poles within Old Government Road easement at POLE P-3 and P-4. Install primary and secondary conductors between POLES P-2 and POLES P-4.

POLE P-4 is within the alignment used by the telephone lines. P-4 is near an existing telephone company pole.

4) Replace existing POLE P-5 with a new 40-foot pole.
5) Install primary and secondary conductors from POLE P-4 to POLE JP-6, completing the connection to the existing distribution system in Laupahoehoe Valley. This link utilizes a pole alignment used for telephone service and for electrical service to the Jodo Mission at TMK 3-6-2:34.


7) Remove poles, down guys and anchors at POLES P-38-1, P-38-1L, P-1 and JP-2.

8) Additionally, place anchors according to construction drawing (Figure 4).

All poles to be used are wooden (Douglas Fir). The electrical load capacity of the conductors is 2,400 volts.

(3.) Maintenance

Routine maintenance, to be performed as needed, would include tree trimming according to HELCO Specification No. TT9301-0 (March 1993). The entire distribution line within the project area would be maintained according to the standards for Primary Distribution Lines. These specifications require that "...no vegetation, including movement with wind, shall be closer than 12 feet to aerial conductors. No overhang is permitted." The specifications also require that tree trimming contractors follow best practices of their industry and strongly recommend adherence to the methods described in "Pruning Trees Near Electric Utility Lines" by Dr. Alex L. Shigo.
The proposed placement of the distribution line along the County Highway may require some trimming of hau (Hibiscus tiliaceus) and kukui nut (Aleurites molucana) trees that impinge on the right-of-way. It is anticipated that such trimming would be minimal since most of this alignment passes by landscaped property or follows existing telephone service and secondary electrical distribution lines.

B. Economic and Social Characteristics

The proposed action would provide more reliable service to the Laupahoehoe Point area and would reduce the cost of future maintenance. Construction costs would be borne by HELCO.

The objectives of this proposal are in accordance with the current policy of placing distribution lines only within legal easements. Furthermore, these distribution lines serving Laupahoehoe Point would be more easily and cost-effectively maintained in the future, since all of the poles for the new installation would be easily accessible by truck. Two of the existing poles to be removed are within private property (TMK 3-6-2:11) with very poor access and no legal easement. One other pole is completely inaccessible by truck and requires use of a helicopter for maintenance.

A brief interruption of electrical service to customers would be required to connect the new installation.
C. Environmental Characteristics

Disturbance of the existing environment would be small and limited to the immediate vicinity of the four new poles to be installed and some tree trimming near the conductors. All new poles would be placed within county highway easements, within areas that are currently maintained by mowing, trimming, etc. Trucks and other construction equipment would be kept within the public easements.

Installation of the distribution line along the county highway may require some trimming of hau (Hibiscus tiliaceus) and kukui nut (Aleurites molucana) trees that impinge on the right-of-way. It is anticipated that such trimming would be minimal since most of this alignment passes by landscaped property or follows existing telephone lines and secondary power distribution lines.

The proposed action would have the beneficial impact of reducing future disturbance of the vegetation. The new configuration consolidates the distribution line with other infrastructure/utility distribution alignments, i.e. the county highway, telephone service and water main. These areas have been maintained with very short vegetation in the past. The portion of the distribution alignment to be abandoned (POLE 38-1 to JP-2) will no longer be subject to tree trimming or removal. This section, which is outside the county highway right-of-way, occasionally required extensive tree removal in the past.
V. SUMMARY DESCRIPTION OF THE AFFECTED ENVIRONMENT

A. Description of the Project Site and Adjacent Area

The project area is within Laupahoehoe Valley, North Hilo District, TMK plat 3-6-2 (Figures 1, 2 and 3).

Although most activity during the construction phase would be concentrated around the locations of the four new poles and the one pole to be replaced, the project area is here defined inclusively to be a corridor 20 feet either side of the proposed alignment of the overhead conductors, as well as a corridor either side of the poles and conductors proposed to be removed. This corridor is ample to accommodate anticipated construction-related disturbance near poles and the 12-foot vegetation-free zone specified in the maintenance plan presented below.

The floor of the valley in the vicinity of the proposed action is variably landscaped around homes, or is unmanaged, secondary vegetation. Nearby, but outside of the project area, are four homes, a Jodo Mission building that also contains a residence, the Laupahoehoe Community Center, Laupahoehoe Point County Park, and a boat ramp constructed by the U.S. Army Corps of Engineers. All of these parties are served, and would continue to be served, by the HELCO distribution lines that are the subject of this proposal.

The portion of the valley floor to be affected by removal of equipment and abandonment of the existing alignment is:

TMK 3-6-2:11 a privately owned, residential parcel;

a public easement identified on TMK plat map 3-6-2 as "Old Gov't" Road [9673 sq. ft.]." This is an old road segment abandoned approximately 1941. It is overgrown with large trees and completely inaccessible to vehicles.
New pole placement, installation of new overhead conductors, or modification to overhead conductors would affect the following parcels:

the easement of a county highway identified on TMK plat map 3-6-2 as the "Old Government Main Road" and "Laupahoehoe Point Road;"

B. Existing Structures/Use

The major existing use of the project area is as a utility corridor and county highway. The county highway segments involved are identified on TMK plat map as "Old Government Main Road" and "Laupahoehoe Point Road." The highway is paved with asphalt. A buried County Department of Water Supply water main follows the highway.

The alignment segment to be removed crosses a privately-owned lot with a permitted residence under construction (TMK 3-6-2:11). The existing alignment is 50 ft. from this residence. This alignment to be abandoned also passes onto or very near a vacant lot (TMK 3-6-2:33). Parts of this alignment also follow an abandoned, overgrown publicly-owned right-of-way identified on the tax map as "Old Gov't. Rd."

All of the 695 feet of distribution line to be installed or modified by the proposed action would be within the easement of the county highway. Of this 695 feet, 350 feet would follow the alignment of either existing HELCO distribution lines or the telephone service lines.

No other structures occur within the project area.

Access to the project area is given by Hawaii Belt Highway (State Highway) connecting to county highways identified on tax maps as Old Government Main Road and Laupahoehoe Point Road (Figure 3).
C. Flora and Fauna

(1.) **Flora**

(Prepared by Grant Gerrish, Ph.D in Botanical Science)

The vegetation within and immediately surrounding the project area is a combination of maintained roadsides, landscaped property and secondary forest groves.

The vegetation and natural environment reflect the intensive human use of the area in recent times. Many houses and commercial buildings occupied the area during the first half of the 20th century. Areas that are not actively maintained are rapidly overgrown by fast-growing introduced plants. Most prominent among these are Napier grass (*Pennisetum purpureum*), morning glory (*Ipomoea* spp.) and African tulip tree (*Spathodea campanulata*).

Parts of the project area that have not recently been cleared may have a closed canopy forest of introduced trees made up mostly of common guava (*Psidium guajava*), Chinese fan palm (*Livistona chinensis*), Java plum (*Syzygium cumini*) and a Polynesian introduction, kukui nut tree (*Aleurites moluccana*). A few large eucalyptus (*Eucalyptus robusta*) and silk oak (*Grevillea robusta*) occur near the project areas.

A few native o‘hi‘a lehua (*Metrosideros polymorpha*) trees occur on the slopes, well outside the project area, as do two other native trees, neneleau (*Rhus sandwicensis*) and hala (*Pandanus tectorius*). None of these trees would be affected by the proposed action.

No native plants naturally grow within the project area, with the exception of hau (*Hibiscus tiliaceus*) and two common species of ferns. Native plants have been planted for landscaping purposes within TMK 3-6-2:11, including o‘hi‘a lehua, hapu (*Cibotium glaucum*) naupaka (*Scaevola sericea*), and loulu lelo (*Pritchardia hillebrandii*). These landscaping plants would not be disturbed by the proposed action.
No rare or endangered plants occur anywhere on or near the site. The land use history and dominance of the site by introduced plants make it unlikely that the project area would be suitable habitat for any rare or endangered plant.

The vegetation of the project area proper, where construction and maintenance-related disturbance would occur does not contain closed canopy forest. No large trees would be removed. The area where new poles and conductors would be installed is a grassy road shoulder with some hau and Kukui trees impinging, that may require minimal trimming.

The following plant species occur within or adjacent to the project area.

Trees include:

<table>
<thead>
<tr>
<th>Plant Name</th>
<th>Scientific Name</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>mango</td>
<td>Mangifera indica</td>
<td>Alien</td>
</tr>
<tr>
<td>avocado</td>
<td>Persea americana</td>
<td>Alien</td>
</tr>
<tr>
<td>guava</td>
<td>Psidium guajava</td>
<td>Alien</td>
</tr>
<tr>
<td>kukui nut</td>
<td>Aleurites moluccana</td>
<td>Alien</td>
</tr>
<tr>
<td>Java plum</td>
<td>Syzigium cumini</td>
<td>Alien</td>
</tr>
<tr>
<td>African tulip</td>
<td>Spathodea campanulata</td>
<td>Alien</td>
</tr>
<tr>
<td>citrus</td>
<td>Citrus sp.</td>
<td>Alien</td>
</tr>
<tr>
<td>macadamia nut</td>
<td>Macadamia ternifolia</td>
<td>Alien</td>
</tr>
<tr>
<td>plumeria</td>
<td>Plumeria sp.</td>
<td>Alien</td>
</tr>
<tr>
<td>coconut</td>
<td>Cocos nucifera</td>
<td>Alien</td>
</tr>
<tr>
<td>breadfruit</td>
<td>Artocarpus altilis</td>
<td>Alien</td>
</tr>
<tr>
<td>hau</td>
<td>Hibiscus tiliaceus</td>
<td>Indigenous</td>
</tr>
<tr>
<td>banana</td>
<td>Musa sp.</td>
<td>Alien</td>
</tr>
</tbody>
</table>
Shrubs, herbs, grasses, and ferns include:

sourbush  
California grass  
pangola grass  
basket grass  
napier grass  
Hilo grass  
thimbleberry  
honohono  
swordfern  
fern (no common name)  
pakahakaha (fern)  

Alien  
Alien  
Alien  
Alien  
Alien  
Alien  
Alien  
Indigenous  
Indigenous  

Vines include:

lilikoi  
morning glory  
mucuna

Alien  
Alien  
Alien  

Passiflora edulis  
Ipomoea callica  
Mucuna sp.
(2.) FAUNA

The vertebrate fauna of the project area is primarily alien birds, mongoose and rodents.

Birds include:

Barred Dove  Alien
Common Indian Myna  Alien
House Finch  Alien
Japanese White Eye  Alien
Melodius Laughing Thrush  Alien
Northern Cardinal  Alien
Nutmeg Mannikin  Alien
Spotted Dove  Alien

The endangered Hawaiian Hawk or I‘o is frequently seen flying above Laupahoehoe Valley and throughout the Hamakua Coast. No large trees, suitable for nesting by this species, are within the project area. It is anticipated that the proposed action would have no adverse impact on this species.

D. Topography

The topography of the project area is a relatively level valley floor adjacent to a steep valley side. Within the project area itself, the alignment drops approximately 60 feet in elevation over a horizontal distance of about 700 feet.

E. Shoreline

Not shoreline.
F. Existing Covenants, Easements and Restrictions.

Records of the County of Hawaii Department of Public Works indicate no known restrictions or easements encumber the project area.

Neighboring parcel TMK 3-6-2:11 is subject to Conservation District Use Permit (CDUP) HA-2503. No other relevant CDUPs are known.

G. Historic Sites Affected

No known historic sites would be affected by the proposed action.

VI. IDENTIFICATION AND SUMMARY OF MAJOR IMPACTS AND ALTERNATIVES

A. Impacts

No significant adverse impacts are anticipated.

Construction impact would be negligible. Trucks and other construction equipment would remain within the right of way of the County Highway. Disturbance would be concentrated in the immediate vicinity of the poles to be installed. All of these pole sites are within the County Highway right-of-way in areas which are maintained by mowing and trimming. Most of the soil excavated from the holes for pole installation would be used as backfill around the pole, the remainder would be removed. These excavations and pole installations would not affect Laupahoehoe Stream because the nearest pole is 130 feet from the stream. Moreover, the terrain is generally level and the opportunity for runoff or soil erosion is slight.

Interuption of utility service to users within Laupahoehoe Valley would be limited to a brief period while the new service installations are being activated.
An insignificant visual impact is anticipated. This visual impact would be insignificant because most of the county highway at Laupahoehoe Point has utility poles (telephone or electrical service) within its easement. Poles and overhead conductors are currently quite visible within the project area itself. The placement of POLES P-2, P-2X, and P-3 may increase visibility to motorists by placing poles in an alignment along the county highway where none currently exist and the placement of 345 feet of overhead conductor between POLES P-2 and P-4 is a new installation.

Change to the overall visual impact of the distribution system would be negligible since placement of new poles and conductors is mitigated by the removal of similar equipment and abandonment of the 350 ft. alignment between POLES 38-1 and JP-2 which would reduce visibility. The position of the new poles (as well as the existing ones) on the valley floor mitigates against significant adverse aesthetic impact since they would not project into view planes of the coastline. They would be conspicuous only when being passed on the county highway.

B. Alternatives

Possible alternatives include No Action and other possible routes.

Choice of No Action would leave the distribution lines in locations that cannot be adequately maintained and not in compliance with easement policies. Poor maintenance may result in unsafe conditions, interuption of service and costly repairs.

HELCO engineers have evaluated other possible routes for realigning the distribution lines within Laupahoehoe Valley. The proposed action incorporates the most efficient route that achieves the objectives.

VII. MITIGATIONS

No Mitigation Measures are proposed because no significant adverse impacts are anticipated.
VIII. DETERMINATION

It is here determined that the proposed action would have no significant adverse impact and preparation of an Environmental Impact Statement is not required.

This document shall serve as a notice of determination and a Negative Declaration.

IX. FINDINGS AND REASONS SUPPORTING DETERMINATION

The proposed action would have no significant adverse impact because the proposed action is minor and because no significant resources would be disturbed within the project area.

Construction activity would be limited to sites around four new poles to be installed and one existing pole to be replaced. All of these locations are within county road right-of-ways and are areas that are currently mowed, trimmed or otherwise routinely maintained. Areas where trees may be trimmed do not contain rare plants.

The proposed action does not meet any of the Significance Criteria of HAR Title 11 Section 200-12, in that:

the proposed action would not involve irrevocable commitment or loss of any resources, would not curtail use of the environment, would not conflict with State environmental policies and guidelines as expressed in HRS Chapter 343.

Nor would the proposed action adversely affect the economic or social well being or the public health of the community. On the contrary, it is anticipated that the proposed action would make an existing electrical distribution system more reliable and efficient.
The proposed action would not have secondary impacts on population growth or public facilities because the capacity of the electrical distribution system would be neither decreased nor increased.

No significant adverse environmental impacts have been detected during the assessment process nor are any anticipated.

No cumulative impacts would occur because the action as here proposed is complete and makes no commitment for any future action. The proposed action would not make any other potential use of the region significantly more or any less desirable.

The proposed action would not significantly affect any rare, endangered or threatened species or their habitat. Water quality would not be affected. Any impact to ambient air or noise quality would be negligible and limited to the brief duration of construction activity.

The proposed action would not adversely impact any environmentally sensitive area. The project area is within the State’s Conservation District. This Environmental Assessment has been submitted in conjunction with a Conservation District Use Application (CDUA). The proposed action is subject to review by the Office of Conservation and Environmental Affairs and requires the approval of the Board of Land and Natural Resources.
X. COMMENTS RECEIVED AND APPLICANT RESPONSES

Comments were received from thirteen State and Hawaii County agencies during the review period or at other times during the review of Conservation District Use Application # HA-2795. Only the Office of Environmental Quality Control commented during the review period of this Environmental Assessment.

Commenting agencies are listed below with responses from applicant where appropriate. Ten of the thirteen responding agencies responded with "No Comment" or a statement that no permit would be required from that agency. Letters of comments from agencies with substantive comments are appended after page 21.


Comments Appended.

Applicant Response: 1) A discussion of construction impacts, especially as the proposed action might affect Laupahoehoe Stream has been added to section V.A of this Final Environmental Assessment.

2) A full discussion of the anticipated impact of the proposed action and the significance criteria of HAR Title 11-200-12 has been added to section IX of this Final Environmental Assessment. The proposed action was determined to have no significant impacts according to those criteria.

3) Figure A-2 has been deleted from this Final Environmental Assessment. The abbreviations R and L had meant Resource and Limited Conservation District Subzones, respectively. The figure was deleted because it was intended for inclusion in the CDUA, presenting subzone information necessary for that application. Figure 2 of this Final Environmental Assessment shows the project site on the same base map (the 1:24,000 Laupahoehoe quadrangle map) as the deleted figure.
4) The poles are made of Douglas Fir (wood) and the lines would carry 2,400 volts of electricity. This information has been incorporated into the text of this Final Environmental Assessment in section IV A (2).

5) A letter (appendix) explaining the nature of the proposed action has been sent to all owners of land to be affected or that adjoin the County right-of-way to be affected. The following parties were contacted at the addresses of record in the County Real Property Tax Office:

   TMK 3-6-2:11
   Grant and Sharon Gerrish
   PO Box 282
   Laupahoehoe, HI 96764

   TMK 3-6-2:33
   Edward Norman Scott
   1227 Bardstown Rd.
   Louisville, Kentucky 40204

   TMK 3-6-2:34
   T. H. Davies & Co. Ltd.
   841 Bishop St. Suite 2300
   Honolulu, Hawaii 96813

   TMK 3-6-2:15
   Alfred H. and Harriet K. Branco
   PO Box 42
   Laupahoehoe, Hawaii 96764

   TMK 3-6-4:33
   B.P. Bishop Estate
   567 S. King St.
   Honolulu, Hawaii 96813
Letters to property owners used the following form. Letters were mailed on or about March 15, 1996.

NOTICE TO PROPERTY OWNER OF TMK --:

Dear Property Owner,

This letter is to inform you of a proposed change in the electrical distribution lines near your property, TMK in Laupahoehoe, Hawaii. Hawaii Electric Light Company, Inc. (HELCO) has filed a Conservation District Use Application (CDUA) for a permit to make certain changes. Since the proposal would affect distribution lines within public right-of-ways that abutt your property, you are invited to comment on this proposal.

The changes are shown on the attached map. The purpose of these changes is to move the distribution lines from private property and to place all poles and conductors within the County easement along the road where this equipment can more easily be maintained. The proposed changes would not affect any HELCO customers, other than a brief outage while the new distribution line is being connected. Notification of the outage will be published in the local newspapers.

You may send any comments to

Cathy Tilton
Department of Land and Natural resources
Office of Conservation and Environmental Affairs
PO Box 621
Honolulu, Hawaii 96809.

Reference your comments to CDUA HA-2795 and be sure to include your TMK Number ( -- : ).

Sincerely,

- 19 -
2. Commission on Water Resource Management, Department of Land and Natural Resources (DLNR), State of Hawaii. Jan. 8

Stream Channel Alteration Permit not required.

3. State Historic Preservation Division, State of Hawaii

No effect on historic sites.

4. Office of State Planning, State of Hawaii

No Comment.

5. Office of Hawaiian Affairs

No Comment.

6. Department of Health, State of Hawaii

No Comment.

7. Aquatic Resources, Department of Land and Natural Resources, State of Hawaii.

No Comment.


No Comment.

No Comment.

10. Division of Land Management, Department of Land and Natural Resources, State of Hawaii.

No Comment


No Objection. HELCO shall submit plans and an application for a permit for work with in State right-of-way.

Response: The proposed action does not include any activity within the State right-of-way.

12. Planning Department, County of Hawaii.

Appended

Upon review of a Special Management Area (SMA) Use Permit Assessment Application submitted by HELCO, the Planning Department determined that the proposed action is exempt and does not require an SMA permit.


Comments Appended.

Response: All work would be done in compliance with the Hawaii County Code following application to the Planning Department.
Michael Wilson, Chairperson  
Office of Conservation and Environmental Affairs  
Department of Land and Natural Resources  
1151 Punchbowl St.  
Honolulu, Hawaii 96813  

Attention: Cathy Tilton  

Dear Mr. Wilson:  

Subject: Draft Environmental Assessment (EA) for HELCO Relocation of Electrical Distribution Lines at Laupahoehoe, Hawaii; TMK: 3-6-2: 11  

Please include the following in the final EA:  

1. A discussion of construction impacts, their mitigation measures, and what steps will be taken to prevent runoff into Laupahoehoe Stream.  
2. A full discussion, according to the significance criteria listed in HRS Title 11-200-12, of the reasons this project will not have adverse environmental impacts, as stated in the draft EA.  
3. Indicate on Figure A-2 what the abbreviations R and L represent.  
4. The material the poles are made of and the electrical load capacity of the lines.  
5. Consult with the nearest neighbors and include documentation of your contacts.  

If you have any questions, please call Nancy Heinrich at 586-4185.  

Sincerely,  

GARY GILL  
Director  

C: Mark Gushiken, HELCO  
Grant Gerrish
TO:  MICHAEL D. WILSON, CHAIRPERSON
DEPARTMENT OF LAND AND NATURAL RESOURCES

FROM:  KAZU HAYASHIDA, DIRECTOR
DEPARTMENT OF TRANSPORTATION

SUBJECT: REQUEST FOR COMMENTS
CONSERVATION DISTRICT USE APPLICATION
HAWAII ELECTRIC LIGHT CO., INC.
FILE NO.: HA-2795

We have no objections to this application. Hawaii Electric Light Co., Inc. (HELCO), shall submit three (3) sets of plans to the State Highways, Hawaii District Office for review and approval. Upon approval, HELCO shall submit a permit application for work within the State right-of-way before commencing work.
January 8, 1995

Mr. Michael Wilson, Chairperson
Board of Land & Natural Resources
State of Hawaii
Department of Land & Natural Resources
P.O Box 621
Honolulu, HI 96809

Dear Mr. Wilson:

RE: CDUA Application HA-2795
Relocate Existing Electrical Distribution Lines at
Laupahoehoe Point, Laupahoehoe, N. Hilo, Hawaii Island
Tax Map Key: 3-6-02:11

Because the above project is in the Special Management Area, Hawaii
Electrical Light Company, Inc. submitted to the county Planning
Department SMA Use Permit Assessment Application No. 95-61 dated
November 6, 1995. The proposal was found to be exempt under Hawaii
County Planning Commission SMA Rule 9. A copy of the exemption
letter dated December 11, 1995 is enclosed for your records.

Any questions on this matter can be discussed with Earl Lucero or
Daryn Arai of this office at 961-8288.

Sincerely,

VIRGINIA GOLDSTEIN
Planning Director

EML:mjs
0261D

Enclosure

xc: Dept. of Public Works - Engineering Division
SMA Section
TMK: 1-5-87:119 & 120
TMK: 1-5-63:103
December 28, 1995

MICHAEL D. WILSON, CHAIRPERSON
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

SUBJECT: CDUA APPLICATION HA-2795
Laupahoehoe, North Hilo, Hawaii
TMK: 3-6-02: 11

We acknowledge receipt of your letter concerning the subject matter, and provide you with our comments as follows:

1. All earthwork and grading shall be in conformance with Chapter 10, Erosion and Sediment Control, of the Hawaii County Code.

2. Any work within the County right-of-way shall be in conformance with Chapter 22, Streets and Sidewalks, of the Hawaii County Code.

3. Construction within any special flood hazard area(s) shall be in conformance with Chapter 27, Flood Control, of the Hawaii County Code.

4. All utility poles and underground utility construction within the County right-of-way shall be in conformance with the policies of the Department of Public Works.

5. All traffic control devices within the County right-of-way shall be in conformance with the current edition of the "Manual on Uniform Traffic Control Devices for Streets and Highways".

6. Application should be submitted to the Planning Department for their review and comments.
7. The Old Government Road showed on TMK: 3-6-02, was abandoned as a roadway in 1989 by Resolution No. 175 (attached). This former roadway maybe under the jurisdiction of the Department of Finance and not the Department of Public Works.

Should there be any questions concerning this matter, please feel free to contact Mr. Casey Yanagihara in our Engineering Division at (808)981-8327.

Galen M. Kubo, Division Chief
Engineering Division

CKY
attachment
cc: Planning Department