October 2, 2000

Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control
State Office Tower
235 S. Beretania Street, Suite 702
Honolulu, Hawai‘i 96813

SUBJECT: Hualalai Elderly Housing Project Phase II
TMK: 3rd/7-5-10: por. of 7
Kailua, North-Kona, Hawai‘i
Final Environmental Assessment (EA)

The County of Hawai‘i, through its Office of Housing and Community Development (OHCD), has reviewed the comments received during the 30-day public comment period, which began on August 8, 2000. The OHCD has determined that this project will not have significant environmental effects and hereby issues a finding of no-significant impact. Please publish this notice in your upcoming Environmental Notice.

Enclosed are a completed OEQC Bulletin publication form and four copies of the Final EA. Please contact me at 808/961-8379 if there are any questions.

Edwin S. Taira
Housing Administrator
FINAL ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

(HUALALAI ELDERLY HOUSING PROJECT PHASE II)

KAILUA, NORTH KONA, HAWAII  TMK: (3) 7-5-10: por. of 7

APPROVING AGENCY: COUNTY OF HAWAII
OFFICE OF HOUSING AND COMMUNITY DEVELOPMENT

50 WAILUKU DRIVE
HILO, HAWAII 96720

SEPTEMBER, 2000

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1. INTRODUCTION

1.1 Purpose

The Hawaii Island Community Development Corporation (HICDC), is proposing to develop the Hualalai Elderly Housing Project - Phase II, for low income elderly residents in Kailua-Kona, Hawaii. The HICDC plans to utilize funding from the United States Department of Agriculture (USDA) Rural Development (RD) Rural Rental Housing Program (Section 515), the United States Department of Housing and Urban Development’s (HUD) Home Investment Partnerships Program (HOME) as well as the Low Income Housing Tax Credit Program. The use of federal funds triggers the requirements for an Environmental Assessment (EA) in accordance with Federal Regulations 24 CFR Part 58. In addition, the presence on the property of the Great Wall of Kuakini, determined to be significant under criterion of the National Register of Historic Places and Chapter 6E of the Hawaii Revised Statutes (HRS), triggers the environmental review process required by Chapter 343, HRS.

1.2 Identification of Applicant

Mr. Keith H. Kato is the Executive Director the Hawaii Island Community Development Corporation, a Hawaii nonprofit corporation, doing business at 99 Aupuni Street, Suite 104, Hilo, Hawaii 96720.

1.3 Identification of Approving Agency and Responsible Entity

In accordance with Chapter 343, HRS, the Mayor of the County of Hawaii, or an authorized representative, is the appropriate accepting authority of the Environmental Assessment. In addition, the County of Hawaii is the “Responsible Entity” that will carry out the federal environmental review requirements of CFR 24 Part 58.

1.4 Technical Description

The Hawaii Island Community Development Corporation (HICDC) is proposing to develop the Hualalai Elderly Housing Project - Phase II, for low income elderly residents on approximately 4.2 acres of land in Kailua-Kona, Hawaii. Tax Map Key (3) 7-5-10: por. of 7. The proposed project is situated adjacent and to the south of the existing thirty (30) unit Hualalai Elderly Housing Project which was completed in January, 1999. (Please see Figure 1 - Location Map, Figure 2 - Site Plan, Figure 3 - Tax Key Plat Map and Figure 4 - Aerial Photo of Project Area.) The proposed low income elderly project will sublease approximately 4.2 acres of the 10.36 acre parcel from Lanaihau Partners L.P., a Delaware limited partnership, who are leasing the property from Joan Anderson and David Greenwell.

The proposed project will be built in a similar style and layout as the existing Hualalai Elderly Housing project. The project will consist of thirty-six (36), one (1) bedroom/one (1) bath units with
HUALALAI ELDERLY HOUSING - PHASE II

FIGURE 2: SITE PLAN

scale 1:100

Schematic Site Plan

accessible units
36 units including 4
HOUSING PHASE II

HUALALAI ELDERLY

existing driveway

accessible units
units including 2
30 one bedroom
Phase I

project entry

existing
FIGURE 4 - AERIAL PHOTO OF PROJECT AREA
approximately five hundred (500) square feet of living area per unit. Other improvements will
include extensive landscaping, thirty-six (36) regular parking stalls, four (4) accessible stalls, a
common building with laundry facilities, open and covered patio, office and storage space.
(Please see Figure 5 - Schematic Elevation of Typical Units, Figure 6 - Schematic Elevation of
Commons Building and Appendix C - Landscape Plan). The proposed project will be in
compliance with Americans with Disabilities Act (ADA) requirements. Four (4) of the thirty-six
(36) units will be designed and constructed as accessible units and the remaining units will all be
adaptable to ADA requirements. A ten meter wide buffer zone will be provided to ensure that the
Great Wall of Kuakini is left intact and will not be disturbed by the proposed project.

Access to the site will be provided from Hualalai Road which is a County owned and maintained
roadway. Hualalai Road has a 30 foot wide right-of-way and a 22 foot wide pavement with 3
foot wide shoulders. All utilities including County water is available to the site. Sewage
disposal will be handled with an on-site septic system.

Construction for the proposed project is expected to begin in January, 2001, and be completed in
October, 2001. The total project cost is estimated at approximately $5.5 million.

1.5 Project Background

1.5.1 Need for the Project

The Hualalai Elderly Housing Project - Phase I was completed in January, 1999 and was
fully rented up within the first two months of operation. During its first full year of
operation, the Phase I project has maintained a vacancy level under five percent. Further,
the existing project has a waiting list of over 50 low income elderly individuals and
families who would like to occupy the units. The proposed affordable housing units will
address an existing affordable housing demand in the County of Hawaii and in West
Hawaii in particular.

1.5.2 Land Use Designations

The subject property is situated within the State Land Use Urban District. The County
General Plan Land Use Pattern Allocation Guide Map (LUFAG) designates this area as
"Medium Density Urban". Such a designation allows village and neighborhood
commercial activities as well as residential development with a density of up to 35 units
per acre. The county zoning designation for the project site is Multiple-Family
Residential Four Thousand (RM-4).

The proposed project is not situated within the Special Management Area designated by
the County of Hawaii. The project does not involve the placement, erection or removal
of materials, nor increase the intensity of use in the Coastal Zone. The proposed project
is consistent with all State and County land use designations and regulations.
FIGURE 5 - SCHEMATIC ELEVATION OF TYPICAL UNITS

SCHEMATIC ELEVATION of TYPICAL UNITS as viewed from parking lot
scale 1/8"=1'

HUALALAI ELDERLY HOUSING - PHASE II
Odor/McCarty Architects Limited

PLATE 5
FIGURE 6 - SCHEMATIC ELEVATION OF COMMONS BUILDING

SCHEMATIC ELEVATION of COMMONS BLDG. viewed from parking lot
scale 1/8"=1'

HUALALAI ELDERLY HOUSING - PHASE II

Odo/McCarty Architects Limited

PLATE 6
1.5.3 Listing of Permits and Approvals

The following list of permits and approvals may be required for the proposed project:

State of Hawaii
  Department of Health
  Underground Injection Control

County of Hawaii
  Department of Water Supply
  Department of Public Works
  Planning Department
  Office of Housing & Community Dev.
  Approval-Project Construction Plans
  Subdivision Approval
  Approval of Project Plans

1.6 Agency and Public Consultation

The proposed project was on the agenda for two public meetings. The first meeting was held on September 21, 1999, by the Hawaii County Housing Agency. The second meeting was held by the Hawaii County Council on October 14, 1999. There was no public testimony given during either meeting on the proposed project. The Hawaii County Council approved Resolution No. 144 99 on October 14, 1999, authorizing the exemption of certain zoning code requirements, pursuant to sections 201G-118 and 201G-113 of the Hawaii Revised Statutes for the proposed project.

The following public and private organizations were consulted during the preparation of this environmental assessment:

  United States Fish and Wildlife Service, Division of Ecological Services
  State of Hawaii, Department of Health
  State of Hawaii, Department of Land and Natural Resources
    Division of Forestry and Wildlife
    State Historic Preservation Division
  State of Hawaii, Department of Hawaiian Home Lands
  State of Hawaii, Office of Hawaiian Affairs
  County of Hawaii, Planning Department
  County of Hawaii, Department of Public Works
  County of Hawaii, Department of Water Supply
  County of Hawaii, Police Department
  County of Hawaii, Fire Department
  Ms. Ruby McDonald, Office of Hawaiian Affairs, Kona Office
  Mr. Gene Leslie, Kona Hawaiian Civic Club
2. ENVIRONMENTAL SETTING

2.1 Physical Environment

2.1.1 Geology and Hazards

Environmental Setting

The subject property is located on the lower slopes of Mount Hualalai which geologically is in a late mountain building stage characterized by the capping of the volcano with siliceous andesite lava, and the presence of ash beds which mantle portions of the volcanic shield. The bulk of Hualalai is composed of highly permeable alkali-basaltic lava which erupt somewhat explosively due to their high gas content. Hualalai last erupted in 1800-1801 from several vents along the northwest rift zone. These flows reached the ocean near Kiholo Bay and at Keahole Point.

The volcanic hazard as assessed by the United States Geological Survey is "4" on a scale of ascending risk 9 to 1 (Heliker 1990). Zone "4" includes all of Hualalai where the frequency of eruptions is lower than on Kilauea and Mauna Loa. Less than 15% of the zone "4" designation has been covered by lava in the last 750 years.

The entire island of Hawaii is in earthquake zone 3 of the Uniform Building Code which establishes structural design standards for earthquake resistance for certain types of buildings. This zone is prone to major damages from potential earthquake activity.

Impacts

The proposed project will not expose the residents or the general public to any additional hazard risk that does not already exist. The volcanic hazard risk is relatively low and the same as any other alternative site that could be utilized for the same purpose. All construction activity will be in compliance with current code requirements.

Mitigation Measures

The proposed 36 unit elderly housing project will be constructed to current Building Code standards which includes measures to reduce seismic damage.

2.1.2 Soils

Environmental Setting

The soil types found on the project site include the Punalu'u and Waiaha soil series. The Punalu'u series consists of well-drained, thin organic soils over pahoehoe lava bedrock.
The Waiaha series consists of shallow, well-drained silt loams that formed in volcanic ash. Both soil types are used for pasture with the Punalu'u soils having a capability subclass rating of VIIIS while the Waiaha soils having a capability subclass rating of VII (U.S. Soil Conservation Service 1973). The Land Study Bureau's overall master productivity rating of the subject area for agricultural use is class "E" or "very poor" (Land Study Bureau 1965).

Impacts

Given the location of the project site within the urban boundaries of Kailua village, the low agricultural capability and productivity ratings of the soil and the limited agricultural use of the site and surrounding properties, no adverse impact on agricultural soils or uses are anticipated as a result of the proposed project. The project site does not include prime or unique farmland or other farmland of statewide or local importance.

2.1.3 Climate

Environmental Setting

Hawaii's climate is generally characterized as mild with uniform temperatures, moderate humidity, and two identifiable seasons. The "summer" season, between May and October is generally warmer and drier. The "winter" season, between October and April is cooler and wetter. The project area is situated along the "lee" side of the island of Hawaii which is sheltered from the northeasterly trade winds that prevail throughout the state for most of the year. As such, rainfall in the Kailua region is relatively low (approximately 30 inches annually). The average monthly minimum temperature in Kailua ranges from the mid 60's to 70 degrees Fahrenheit while the average monthly maximum temperature ranges from the low to mid 80's. (University of Hawaii Press, 1982)

Impacts

The mild and comfortable climatic conditions will not have a significant impact on the proposed project.

2.1.4 Hydrology and Drainage

Environmental Setting

The project site is designated Zone X (Areas determined to be outside the 500-year flood plain) on the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (Map Panel 0713D). The subject property is not within the two major drainage ways in the Kailua village area, the Keopu-Henaloli drainage way or the Waiaha drainage way.
Impacts and Mitigation Measures

Development of the proposed project has the potential to increase surface runoff and flooding in the area. A drainage study will be prepared and submitted to the Department of Public Works for their review and approval. The proposed project will adhere to County and State requirements for disposing of runoff and addressing drainage concerns including requirements to contain all development generated runoff on-site. As such, no adverse drainage impacts are anticipated as a result of the proposed project.

The proposed project is not located within one mile of a listed Wild and Scenic River and will not have an effect on the natural, free flowing or scenic qualities of a river in the National Wild and Scenic Rivers system.

2.1.5 Flora and Fauna

Environmental Setting

A botanical survey was conducted on the project site by Evangeline J. Funk, Ph.D., on July 11, 2000. Dr. Funk describes the result of the survey as follows:

“The canopy layer of vegetation on this site is made up of fairly widely scattered kiawe trees (Prosopis pallida (Humb. & Bonpl. ex Willd.) Kunth) from twenty to thirty-five feet in height. There are a few very widely distributed autograph trees (Chispa rosea Jacq.) that overtop the kiawe trees. The scant shrub layer consists of mostly koa haole (Luecoema leucocephala (Lam.) DeWit) bushes. The ground layer is mostly matted hummocks of Guinea grass (Panicum maximum Jacq.) and Lantana bushes (Lantana camara L.) three to four feet in height. There is some fountain grass (Pennisetum setaceum (Forssk.) Chiov.) Coming in. In the open places between the grass hammocks can be found large numbers of Talinum triangulare (Jacq.) Willd. Plants with their simple yellow flowers. Hanging from the kiawe trees and cascading over the koa haole bushes and grass hummocks are large numbers ofropy ivy gourd vines (Coccinia grandis (L.) Voight).

“Two indigenous species (native to Hawaii and other places), ilima (Sida fallax Walp.) and alahe’ e (Psydras odoratum Smith & Darwin) were found on this site. The ilima is widely distributed, but only one alahe’ e tree was found. This small tree is located about thirty feet south of the orange northeast boundary pin right on the eastern boundary line. It is growing out of a pahoehoe lava flow and I marked it with a white plastic band around one of the lower limbs. Alahe’ e is a very attractive, sweet smelling small tree and it is quite unusual to find it at this elevation. Every effort should be made to
save this little tree.

"The remainder of the vegetation of this site is made up of introduced, alien species.

"No candidate, proposed, or listed threatened or endangered species as set forth in the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543) are known from this area and none were found during this survey."

The United States Department of the Interior, Fish and Wildlife Service, commenting on the proposed project, stated in part, the following:

"To the best of our knowledge, no federally endangered, threatened, or candidate species, significant wetlands or other federal trust resources occur in the immediate area of the proposed project site. However, the endangered dark-rumped petrel (Pterodroma phaeopygia sandwichensis) may occur in the general vicinity of the proposed project site. Circumstantial observations and experimental evidence have shown that artificial lighting can disorient petrels and other seabirds when flying between inland nesting areas and offshore feeding grounds. This disorientation is caused by excessively bright outdoor lighting and can result in seabird collisions with man-made structures such as light poles and wires. Injured seabirds that 'fall-out' from collisions are highly vulnerable to predation by dogs, cats, and mongooses."

"At a minimum, we recommend that any light poles erected at the project site be limited to a maximum height of 25 feet since lights higher than this are more likely to cause seabird fall-out. All project lighting should be directed downward, be shaded to prevent light from escaping horizontally, and be of as low wattage as possible. It would also help if the lighting is of muted colors instead of bright white. We suggest you contact the DOWA office on the island of Hawaii for further recommendations."

"In general, the Service recommends that the draft Environmental Assessment (EA) address potential impacts from the proposed project on all native Hawaiian plants and animals and their habitats and identify the Best Management Practices that will be incorporated into the project to decrease the potential for adverse impacts. For example, we recommend that clearing and grading activities be minimized and limited to the immediate project site and that adequate erosion control measures be incorporated to ensure that project-related sediments are not carried into nearby wetlands or coastal waters by storm water runoff."

**Impacts and Mitigation Measures**

No listed, candidate or proposed endangered animal or plant species are found on the subject
property. In terms of conservation value, no botanical or zoological resources requiring special protection are present. The precautions recommended by the Fish and Wildlife Service will be incorporated into the design plans for the proposed project to minimize lighting impacts, erosion and runoff problems.

2.1.6 Air Quality

Environmental Setting

The subject area is affected by pollutants derived from the volcanic emissions from the ongoing Kilauea eruption. Other sources of air pollutants to a limited degree include vehicle emissions and dust from vehicles utilizing the Hualalai Road. In general, however, the ambient air quality of the project area meets all federal and state standards as evidenced by its designation as an “attainment” area by the State Department of Health, Clean Air Branch.

Impacts and Mitigation Measures

Short term impacts resulting from construction activity include dust and exhaust from machinery involved in the installation of the project improvements. Given the relative short construction time period, the potential impacts of these construction activities should be minimal. In addition, the contractor will be instructed to utilize best management practices to minimize dust impact.

2.1.7 Noise

Environmental Setting

Existing noise levels are typical of a medium density residential setting which is affected primarily by traffic on the adjacent residential streets. The project site is not situated in close proximity to any significant noise generators such as airports, industrial activity or major highways. The closest airport is situated approximately seven miles north of the project site and the closest major highway is situated approximately 2,100 feet west and up slope of the project site.

Impacts and Mitigation Measures

Temporary noise impacts will occur from construction activities of the project and are unavoidable. Mitigation measures can be taken, however, to minimize noise impacts including the use of mufflers and implementing construction curfew periods. State Department of Health regulations must be adhered to during construction.
2.1.8 Scenic and Open Space Resources

*Environmental Setting*

Scenic and open space resources for the project area includes ocean views of Kailua Bay and mountain views of Hualalai.

*Impacts*

The proposed project will not have a significant impact on the scenic views and open space of the area due to the sloping nature of the property and the single story construction of the units.

2.1.9 Aquifers and Wetlands

*Environmental Setting*

The project area is within the Keauhou aquifer system which has a sustainable yield of approximately 38 million gallons per day. In fiscal year 1990-91 daily withdrawals from the Keauhou aquifer system averaged approximately 6.9 million gallons per day. The proposed project will utilize approximately 21,000 gallons of water per day.

The project area is not situated within or adjacent to a wetland identified by or delineated on maps issued by the U.S. Department of Interior, Fish and Wildlife Service. In addition, the proposed project is not located in an area designated by the U.S. Environmental Protection Agency (EPA) as being supported by a sole source aquifer.

*Impacts*

The proposed project will not have any adverse impact on any wetland or aquifer resource.

2.2 Social, Cultural and Economic Setting

2.2.1 Socio–Economic Characteristics

*Setting*

Hawaii County’s population increased by almost 75,000 persons between 1950 and 1999. Between 1980 and 1990, Hawaii Island’s population increased by 19 percent, with an average annual growth rate of 5 percent, compared to a growth rate of 1.4 percent statewide. The most recent population estimates for Hawaii Island was 143,135 persons in 1998 by the State Department of Business, Economic Development and Tourism.
The 1990 census data found that almost 3,500 households in North Kona and over 1,300 households in South Kona have incomes primarily from Social Security, public assistance or retirement income. If the ratio of elderly population for the entire population (approximately 22 percent for West Hawaii) is consistent with these households, that means approximately 1,070 North and South Kona households are made up of the elderly with limited incomes. In 1999, a single person household earning up to $17,800 and a two person household earning up to $20,350 would qualify as an eligible family whose income is 50% or less of the area median income.

Current market rentals for studio and one-bedroom units in West Hawaii generally exceed $500 per month. Approximately 80 percent of the tenants in the Phase I project pay less than $200 per month for their portion of the tenant rent. As such, those tenants that meet the project’s age and income criteria (62 years of age and older with incomes no greater than 50% of the median income) will benefit tremendously by the development of the proposed project.

Impacts

The proposed 36 unit elderly housing project will have a beneficial socio-economic impact by addressing an existing affordable housing demand in the County of Hawaii and in West Hawaii in particular. Monthly rents will not exceed 30 percent of the household income for tenants earning no greater than 50 percent of the median income. This will be significantly lower than market rents for 'typical' 1-bedroom units in West Hawaii.

The proposed project is not located in a neighborhood that suffers from adverse human health or environmental conditions, nor will it be situated in a neighborhood that is predominantly low income or of a minority population. No adverse impacts on low income or minority persons are anticipated from the proposed project.

2.2.2 Adjacent Land Uses

Existing Setting

The 30- unit, Hualalai Elderly Housing Project - Phase I is situated adjacent and to the north of the proposed project. The project site is situated in a pocket of undeveloped land within Kailua Village. Vacant lands to the west and south are either unutilized or only sporadically used for grazing of livestock. The Pines at Kailua-Kona, a residential condominium project, is situated to the east of the site, on the eastern side of the Hualalai Road. The Aloha Kona Subdivision, a single family residential project with 7,500 square foot lots, is also situated on the eastern side of Hualalai Road to the northeast of the project site.

The project is situated approximately ½ mile from the Kailua Village Core which is the center of commerce and medical services for the North Kona district. This core, bounded by Alii
Drive. Kuakini Highway, Palani Road and Hualalai Road includes shopping complexes, professional, financial and medical service buildings, retail shops and restaurants.

The proposed project is not situated within an FAA-designated civilian airport Runway Clear Zone (RCZ), within a military airfield Clear Zone (CZ) or Accident Potential Zone (APZ). The closest airport is the Kona International Airport situated approximately seven miles north of the project site.

The proposed project is not situated within one mile of a NPL ("Superfund") site, nor within 2,000 feet of a CERCLIS site, nor adjacent to any other known or suspected sites contaminated with toxic chemicals or radioactive materials. The proposed project is situated within a residential setting without any nearby explosive or flammable operations.

**Impacts**

The proposed project will be consistent with the character of the existing residential projects on the eastern side of Hualalai Road. The proposed project will have little or no impact on the existing land use pattern of the surrounding properties and activities including commercial, health care or educational facilities. The proposed project will not expose either people or buildings to hazards from aircraft, explosive or flammable operations, toxic chemicals or radioactive materials.

**2.3 Public Facilities and Services**

**2.3.1 Roads and Traffic Circulation**

**Setting**

The public roadway providing access to the site is the Hualalai Road which is a two-lane County road. This segment of Hualalai Road fronting the subject property is a mauka-makai link between Kuakini Highway and the Queen Kaahumanu Highway. Hualalai Road has a 22-foot wide pavement and has a posted speed limit in the vicinity of the project site of 35 miles per hour. There are no sidewalks or crosswalks along this section of Hualalai Road.

**Impacts and Mitigation Measures**

The additional traffic to be generated by the 36 unit elderly housing project will be minimal. Only a few of the residents of the existing elderly housing projects own vehicles. Plans for the proposed project do not include any sidewalk or crosswalk improvements. The HICDC has agreed to provide the County of Hawaii, Department of Public Works, a cash payment of $100,000 to utilize for improvements to Hualalai Road. Transportation services for the elderly are provided by social service agencies in the community.
2.3.2 Water Supply

Existing Setting

Water for the proposed project can be made available from an existing 8-inch waterline which is situated along Hualalai Road approximately 300 feet from the subject property.

Impacts and Mitigation Measures

The proposed 36 unit elderly housing project will not have a significant adverse impact on the existing Department of Water Supply sources. Waterline improvements will be extended to provide service to the proposed project. Although a water commitment for the proposed project has not been secured at this time, the developer will take the necessary steps to secure a water commitment upon completion of the land use regulatory process.

2.3.3 Wastewater

Existing Setting

The Kailua community is served by County’s Kealakehe Wastewater Treatment Plant. The nearest transmission line to the subject property is approximately 1,200 feet away along Kuakini Highway through TMK: 7-5-09: 54. Based on the current distance to the sewer line (approximately 1/4 mile) the approximate off-site sewer cost for the proposed project is $380,000. A septic system serving the project would cost approximately $55,000. The added expense of the off-site sewer connection would make the project cost prohibitive.

Impacts and Mitigation Measures

The developer will not be able to install sewer lines to tie in with the County’s sewer system due to the distance and expense involved. Sewage disposal will be handled by an on-site septic system similar to the one previously approved by the Department of Health and installed for the Hualalai Elderly Housing Project - Phase I.

2.3.4 Electricity, Telephone and Cable TV

Setting

Electricity, telephone and cable T.V. are available to the subject property from existing service lines along Hualalai Road.

Impacts

The proposed project will not have any significant adverse impact on the existing capacity
of these services.

2.3.5 Solid Waste

Existing Setting

The County does not provide any municipal waste pick up services in the area. The nearest county solid waste transfer station to the subject property is within a three mile radius of the subject property. A new landfill facility at Puunahulu, approximately 20 miles to the north, services the communities of West Hawaii.

Impacts and Mitigation Measures

A private waste pick up service will be utilized for the proposed project. In addition, recycling bins can be accommodated on site to encourage the recycling of cans, bottles and paper.

2.3.6 Protective and Social Services

Existing Setting

Protective services including fire, police, rescue and medical services are located in Kailua all within a three mile radius of the project site. These facilities and services adequately meet the needs that would be generated by the proposed project.

Social service agencies currently serving clients in the Hualalai Elderly Housing Project - Phase I include the County’s Elderly Meals on Wheels and Coordinated Services providing transportation, the Food Bank, Department of Human Services - Nursing Home Without Walls and the University of the Nations volunteers. These services will also be available for the Phase II project as well.

Impacts

The proposed project is not likely to create an additional burden on the existing service providers. (Most of the elderly housing residents will be relocating from existing West Hawaii communities.) As such, the proposed project will have a positive impact by placing the residents in closer proximity to the service providers.

2.3.7 Recreation Facilities

Existing Setting

Recreational facilities serving this area of Kailua include county parks such as Hale Halawai
providing a meeting place for the community and picnic area and the Kailua Playground which includes basketball and tennis facilities. The Kailua Park includes ball fields, swimming pool, tennis courts and a gymnasium. State facilities include the Kailua pier, Honokohau boat harbor and the Old Kona Airport State Recreation area which is a coastal park providing areas for picnicking, sunbathing, fishing, wading, and surfing.

Impacts

The proposed project is not likely to create an additional burden on the existing recreational facilities. (Most of the elderly housing residents will be relocating from existing West Hawaii communities.)

2.4 Archaeology, Historic and Cultural Resources

Setting

An archaeological inventory survey of the project area was conducted by Cultural Surveys Hawaii Inc. (CSH) and submitted to the State Historic Preservation Division for review in February, 2000. The archaeological inventory survey involved 100% survey coverage of the four acre project site (portion of TMK 7-5-10: 7). Three sites were encountered during the survey of the project area and include the following:

1. The Great Wall of Kuakini (State Site # 50-10-28-6302/-7276) - The Great Wall of Kuakini has been studied previously and has been assigned significance under all the National Register Criteria.

2. The ahupua’a boundary wall (State Site # 50-10-28-5091) - The ahupua’a boundary wall has also been previously studied although no specific assessment recommendation was located. CSH determined that, “Based on the historic nature of the site, including barbed wire fencing, and that it does not represent a unique site type, significance Criterion D only appears warranted.

3. Twenty-one Agricultural Features (State Site # 50-10-28-21829) - These were typical Kona field system agricultural features (i.e. crude terraces, mounds and modified outcrops). CSH determined that, “All of these agricultural features are very similar to, and possibly an extension of, those sites documented in the inventory survey of the Hualalai Elderly Housing Phase I parcel immediately to the north of the current study. The features of site - 21829 are assigned Criterion D, for the information already generated.”

The State Department of Land and Natural Resources, Historic Preservation Division provided comments on the above-referenced archaeological inventory survey in a letter dated April 13, 2000. The letter states, in part, the following:
"We agree with the significance evaluations for the three sites. Site 6302/7276 (the Kuakini Wall) is significant under Criteria A, B, C, and D. Site 5091 (a boundary wall) and Site 21829 (a complex of agricultural features) are significant under criterion D."

"We also agree with your recommended mitigation treatments. We agree that Site 21829 was significant solely for its information content, and that a reasonable and adequate amount of this information has been collected, so no mitigation work is needed at this site. The Kuakini Wall is to be preserved with a 10 meter buffer. The same preservation plan that was developed for the Phase I area of the Hualalai Elderly Housing Project can be used for Phase II, but the plan needs to be submitted to our office for approval. Site 5091 should be preserved if possible."

**Impacts and Mitigation Measures**

The Great Wall of Kuakini, along the western boundary, and the ahupua'a boundary marking wall, along the southern project boundary, are in good condition and should not be disturbed during development. A buffer zone of 10 meters has already been established between the Great Wall of Kuakini and the proposed construction area. The ahupua'a boundary wall will also be left intact.

The twenty-one agriculturally associated features, now known collectively as State Site 50-10-28-21829, are considered no longer significant based on Criterion D of the National Register of Historic Places criteria for significance evaluations. No further work is recommended for this site.
3. SUMMARY OF POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS AND PROPOSED MITIGATION MEASURES

3.1 Short Term Impacts

Construction Activity:

*Impacts*: Short term impacts will result from the proposed construction activity including increased noise levels, dust and exhaust from machinery involved in the installation of the project improvements. Given the relative short construction time period the potential impacts of these construction activities should be minimal.

*Mitigation*: The contractor will be instructed to utilize best management practices to minimize all impacts including the use of mufflers and implementing construction curfew periods. State Department of Health regulations must be adhered to during construction.

3.2 Long Term Impacts

Geologic Hazard:

*Impacts*: The proposed project will be exposed to damages from potential earthquake activity.

*Mitigation*: The proposed 36 unit elderly housing project will be constructed to current Building Code standards which includes measures to reduce seismic damage.

Light Attraction:

*Impacts*: Lighting for the proposed elderly housing project could disorient and present problems for seabirds when flying between inland nesting areas and offshore feeding grounds.

*Mitigation*: The architect for the proposed project will be required to adhere to the design guidelines as recommended by the Fish and Wildlife Service as well as the Department of Land and Natural Resources, Division of Forestry and Wildlife.

Drainage and Erosion:

*Impacts*: Development of the proposed project has the potential to increase erosion, surface runoff and flooding in the area.

*Mitigation*: Clearing and grading activities for the proposed project will be limited to the immediate project site. The proposed project will adhere to County and State requirements.
for disposing of runoff and addressing drainage and erosion concerns.

**Scenic Resources:**

*Impacts:* The proposed project has the potential to adversely affect scenic views of Kailua Bay and mountain views of Hualalai.

*Mitigation:* Project design will incorporate the natural topography of the property, the single story construction of the units to minimize the potential impacts to the scenic resources.

**Archaeological Resources**

*Impacts:* The Great Wall of Kuakini, along the western boundary, and the ahupua'a boundary marking wall, along the southern project boundary, are in good condition and should not be disturbed during development. However, the project, as proposed, would destroy the agricultural features identified collectively as Site 50-10-28-21829, identified on the subject property.

*Mitigation:* Site 21829 was significant solely for its information content and an adequate amount of that information was recovered during the survey, making this site 'no longer significant'. The developer will work with the archaeological consultant and the State Historic Preservation Division to devise and implement a detailed preservation plan, similar to the plan implemented for the Phase I project which provides for a 10 meter buffer to protect site 7276 (the Kuakini Wall). In addition, Site 5091 (the ahupua'a boundary wall) will be left intact and will not be disturbed by the proposed project. This preservation plan will be developed and implemented prior to any construction or land disturbing activity commencing on the subject property.
4. ALTERNATIVES

4.1 No Action

If the proposed project is not developed, the subject property will remain vacant and unused temporarily. Given the State Land Use Urban designation and the General Plan Medium Density designation of the subject property, it is only a question of when and not if the property will be developed. Some type of commercial or residential use will be established on the subject property to provide an economic return to the owners that is consistent with the value of the property.

4.2 Alternative Solutions

The proposed elderly housing project could be constructed on other sites within the Kailua-Kona region. Although other feasible sites may be available, the financing package for the proposed project is time sensitive and will surely lapse prior to securing an alternative site. Furthermore, it is unlikely that the impacts generated for this site will be significantly less at any other site in the region.
5. DETERMINATION, FINDINGS AND REASONS FOR SUPPORTING DETERMINATION

5.1 Significance Criteria

According to the Department of Health Rules (11-200-12), an applicant or agency must determine whether an action may have a significant impact on the environment, including all phases of the project, its expected consequences both primary and secondary, its cumulative impact with other projects, and its short and long-term effects. In making the determination, the Rules establish "Significance Criteria" to be used as a basis for identifying whether significant environmental impact on the environment if it meets any one of the following thirteen criteria.

1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resources.

   The proposed project involves the development of approximately four acres of land that is currently vacant and most recently utilized for pasture use. The Great Wall of Kuakini, along the western boundary, and the ahupua'a boundary marking wall, along the southern project boundary, are in good condition and will not be disturbed during development. The project, as proposed, would destroy the agricultural features identified collectively as Site 50-10-28-21829, identified on the subject property. Site 21829 was significant solely for its information content and an adequate amount of that information was recovered during the survey, making this site 'no longer significant'.

2. Curtails the range of beneficial uses of the environment.

   The proposed elderly housing rental project will curtail the limited pasture use of approximately four acres of land on the project site. However, there is an abundance of similar property that are available for pasture use.

3. Conflicts with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS; and any revisions thereof and amendments thereto, court decisions, or executive orders.

   The proposed development is consistent with the Environmental Policies established in Chapter 344, HRS, and the National Environmental Policy Act.

4. Substantially affects the economic or social welfare of the community or state.

   The proposed 36 unit elderly housing project will have a beneficial socio-economic
impact by addressing an existing affordable housing demand in the County of Hawaii and in West Hawaii in particular. Monthly rents will not exceed 30 percent of the household income for tenants earning no greater than 30 percent of the median income. This will be significantly lower than market rents for 'typical' 1-bedroom units in West Hawaii.

5. **Substantially affects public health**

The proposed project does not substantially affect public health. Any construction related impacts of noise, dust and emissions would be mitigated by compliance with the State Department of Health Administrative Rules.

6. **Involves substantial secondary impacts, such as population changes or effects on public facilities.**

The proposed project will not have any substantial secondary impacts. The proposed project will address an existing housing demand, evidenced by a substantial waiting list for the Phase I project. As such, most of the elderly housing residents will be relocating from existing West Hawaii communities.

7. **Involves a substantial degradation of environmental quality.**

The proposed project is situated within the Kailua village urban center. There are a number of existing residential projects in the vicinity including both single family and multi-family units. As such, the proposed improvements will not involve a substantial degradation of environmental quality.

8. **Is individually limited but cumulatively has considerable effect on the environment, or involves a commitment for larger actions.**

As stated previously, the proposed project will not have any substantial secondary impacts because it is not a generator of growth. The proposed project does not involve a commitment for larger actions and will not induce other actions having a cumulative effect on the environment.

9. **Substantially affects a rare, threatened or endangered species or its habitat.**

The proposed project will not have any substantial adverse effect on any rare, threatened or endangered species or its habitat.

10. **Detrimentally affects air or water quality or ambient noise levels.**
Short term impacts will result from the proposed construction activity including increased noise levels, dust and exhaust from machinery involved in the construction activity. The contractor will be instructed to utilize best management practices to minimize all impacts including the use of mufflers and implementing construction curfew periods. State Department of Health regulations must be adhered to during construction. Given the relative short construction time period, the potential impacts of these construction activities should be minimal.

11. Affects or is likely to suffer damage by being located in an environmentally sensitive area, such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, freshwater, or coastal waters.

The project site is designated Zone X (Areas determined to be outside the 500-year flood plain). The volcanic hazard risk is relatively low and the same as any other alternative site that could be utilized for the same purpose. All construction activity will be in compliance with current code requirements.

12. Substantially affects scenic vistas and view planes identified in county or state plans or studies.

Scenic resources for the project area includes ocean views of Kailua Bay and mountain views of Hualalai. The proposed project will not have a significant impact on the scenic views of the area due to the sloping nature of the property and the single story construction of the units.

13. Requires substantial energy consumption.

The proposed project will not require substantial energy consumption.

5.2 Findings

Based on the foregoing information presented, it is determined that the proposed 36-unit elderly housing project will not have a significant effect. As such, a determination of a Finding of No Significant Impact for the proposed action is appropriate.

5.3 Reasons Supporting Determination

The nature and scale of the proposed action within the Kailua urban center is such that no significant environmental effects are anticipated. Potential impacts, if any, can be mitigated through sensitive design and careful construction management practices, development of an archaeological preservation plan and compliance with all governmental requirements including those of the Department of Public Works and State Department of Health.
REFERENCES


APPENDIX A - REPRODUCTION OF COMMENTS MADE DURING THE PRE-ASSESSMENT CONSULTATION PERIOD


United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Ecoregion
300 Ala Moana Boulevard, Room 3-122
Box 50088
Honolulu, Hawaii 96850

In Reply Refer To: MSR

Brian Nishimura
101 Aupuni St., Suite 217
Hilo, Hi 96720

Re: Pre-draft Environmental Assessment Information Request for Hualalai Elderly Housing Project-Phase II, Kona, Hawaii Island, Hawaii.

Dear Mr. Nishimura:

The U.S. Fish and Wildlife Service (Service) has reviewed your letter dated January 19, 2000, on the above-referenced project. The lead Federal agency for the proposed project is the U.S. Department of Agriculture (USDA), and the project sponsor is the Hawaii Island Community Development Corporation (HICDC). This letter has been prepared under the authority of and in accordance with provisions of the National Environmental Policy Act of 1969 [42 U.S.C. 4321 et seq. 83 Stat. 852], as amended (NEPA); the Endangered Species Act of 1973 [16 USC 1531 et seq.; 87 Stat. 884], as amended (ESA); and other authorities mandating Service concern for environmental values. Based on these authorities, the Service offers the following comments for your consideration.

The proposed project involves the construction of 35 living units, associated utility buildings, and parking areas as well as landscaping on a 4.2-acre parcel in Kona, Hawaii. The USDA’s Rural Development and Rural Rental Housing Programs are providing funding for the project. The purpose of the project is to improve low-income, elderly housing opportunities within the Kona area.

We have reviewed the information provided in the project summary and in our own files, including maps prepared by the Hawaii Natural Heritage Program and the Service’s National Wetlands Inventory Program. To the best of our knowledge, no federally endangered, threatened, or candidate species, significant wetlands, or other federal trust resources occur in the immediate area of the proposed project site. However, the endangered dark-rumped petrel (Pterodroma phaeopygia sandwichensis) may occur in the general vicinity of the proposed project site. Circumstantial observations and experimental evidence have shown that artificial lighting can disorient petrels and other seabirds when flying between inland nesting areas and offshore feeding grounds. This disorientation is caused by excessively bright outdoor lighting and can result in seabird collisions with man-made structures such as light poles and wires. Injured seabirds that “fall-out” from collisions are highly vulnerable to predation by dogs, cats, and mongooses.
STATE OF HAWAI‘I
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

August 30, 2000

Mr. Keith H. Kato
Hawai‘i Island Community Development Corporation
99 Aupuni Street, Suite 104
Hilo, Hawai‘i 96720

Subject: Hualalai Elderly Housing Phase 2
Historic Preservation Plan

Dear Mr. Kato,

Thank you for the opportunity to review and comment on the preservation plan to preserve the Kuakini Wall. The proposed preservation method of a 33’ buffer zone on the east side of the Kuakini Wall and a 10’ buffer zone on the northern side of the Southern Boundary Wall are acceptable to the Office of Hawaiian Affairs as outlined in the Memorandum of Agreement.

If you have any questions, please contact Ken R. Salva Cruz, Policy Analyst, at 594-1847.

Sincerely,

[Signature]
Colin C. Kippen, Jr.
Deputy Administrator

cc: Board of Trustees
    Hilo CRS
    OEQC
    File
October 16, 2000

Mr. Colin C. Kippen, Jr.
Office of Hawaiian Affairs
711 Kapiolani Boulevard
Suite 500
Honolulu, Hawaii 96813-5249

Subject: Iinalalai Elderly Housing Phase 2
Historic Preservation Plan

Dear Mr. Kippen:

Thank you for your concurrence with the mitigation measures outlined in the Preservation Plan. If you have any questions concerning the project please call me at ph. 969-1158.

Sincerely Yours,

Keith H. Kato
Executive Director
At a minimum, we recommend that any light poles erected at the project site be limited to a maximum height of 25 feet since lights higher than this are more likely to cause seabird fall-out. All project lighting should be directed downward, be shaded to prevent light from escaping horizontally, and be of as low wattage as possible. It would also help if the lighting is of muted colors instead of bright white. We suggest you contact the DOFAW office on the Island of Hawaii for further recommendations [phone: (808) 974-4221].

In general, the Service recommends that the draft Environmental Assessment (EA) address potential impacts from the proposed project on all native Hawaiian plants and animals and their habitats and identify the Best Management Practices that will be incorporated into the project to decrease the potential for adverse impacts. For example, we recommend that clearing and grading activities be minimized and limited to the immediate project site and that adequate erosion control measures be incorporated to ensure that project-related sediments are not carried into nearby wetlands or coastal waters by storm water runoff.

The Service encourages early review of projects and appreciates your concern for endangered and threatened species. If you have any questions regarding these comments, please contact Fish and Wildlife Biologist Mike Richardson by telephone at (808) 541-3441 or by facsimile transmission at (808) 541-3470.

Sincerely,

Paul Henson,
Field Supervisor
Ecological Services
April 13, 2000

Mr. Doug Borthwick
Cultural Surveys Hawaii
733 N. Kaliheo Avenue
Kailua, Hawaii 96734

Dear Mr. Borthwick:


This letter reviews this report which was submitted February 16, 2000 (Bush et al. 2000. Archaeological Inventory Survey for Hualalai Elderly Housing, Phase II at a 4-Acre Parcel ... CSIR ms.).

We believe that the archaeological inventory survey of the 4 acre subject parcel was adequate, finding a total of 3 sites. Two of the sites (5091 and 9302/7276) are previously identified. The one new site (21829) is a complex of agricultural features that are interpreted as a part of the Kona Field System. All three sites have been acceptably documented, except that there is a question as to whether or not Site 5091 is the same site that was initially identified by Rose Schilt. This question and several others need to be addressed before the report will be found acceptable (see our detailed comments in Attachment 1).

We agree with the significance evaluations for the three sites. Site 6302/7276 (the Kuakini Wall) is significant under Criteria A, B, C, and D. Site 5091 (a boundary wall) and Site 21829 (a complex of agricultural features) are significant under Criterion D.

We also agree with your recommended mitigation treatments. We agree that Site 21829 was significant solely for its information content, and that a reasonable and adequate amount of this information has been collected, so no mitigation work is needed at this site. The Kuakini Wall is to be preserved with a 10 meter buffer. The same preservation plan that was developed for the Phase I area of the Hualalai Elderly Housing Project can be used for Phase II, but the plan needs to be submitted to our office for approval. Site 5091 should be preserved if possible.
If you should have any questions or disagreements with our review comments please contact our Hawai'i Island archaeologist, Patrick McCoy (692-8028). Otherwise, we will expect to receive a revised report.

Aloha,

DON HIBBARD, Administrator
State Historic Preservation Division

PM:sh

Attachments
Mr. Brian T. Nishimura  
Planning Consultant  
101 Aupuni Street, Suite 217  
Hilo, Hawaii 96720  

Dear Mr. Nishimura:  

Subject: Request for Comments: Pre-Environmental Assessment Consultation  
Hualalai Elderly Housing Project - Phase II, 4.2 acres, Kailua-Kona, Hawaii Hawaii TMK (3) 7-5-10; por. 7.  

We have reviewed your cover letter to us dated January 19, 2000 for the Hualalai Elderly Housing Project at Kailua-Kona, Hawaii. Although the project development does not directly impact programs under the Department of Land and Natural Resources, Division of Forestry and Wildlife mandates, we would like to comment on the flora and fauna information as conditions of the draft EA requirements. We have no preliminary objections to this proposed application at this time and will look forward to reviewing the draft EA for this project. Thank you for the opportunity to comment.

Sincerely yours, 

Michael G. Buck  
Administrator  

Copy: DOFAW, Hawaii District
Mr. Brian T. Nishimura  
Planning Consultant  
101 Aupuni Street, Suite 217  
Hilo, Hawai‘i 96720

Subject: Request for Comments – Environmental Assessment  
TMK: (3) 7-5-10; por. of 7

Dear Mr. Nishimura,

Thank you for the opportunity to review the above-referenced document for a proposal to develop the Hualalai Elderly Housing Project-Phase II, for low-income elderly residents on approximately 4.2 acres of land in Kailua-Kona.

At this time, the Office of Hawaiian Affairs would like you to enclose the following in your forthcoming Environmental Assessment: 1) a flora and fauna study; 2) a cultural impact statement; 3) a plan to accommodate religious and gathering rights; and 4) an archaeological study with a detailed mitigation plan for any archaeological features which may be adversely impacted by the project. If you have any questions, please contact Ken R. Salva Cruz, Policy Analyst, at 594-1847.

Sincerely,

[Signature]

Colin C. Kippen, Jr.  
Deputy Administrator

cc: Board of Trustees  
Kona CAC  
OEQC
March 31, 2000

Mr. Keith Kato
Hawaii Island Community Development Corporation
99 Aupuni Street, Suite 104
Hilo, Hawaii 96720

Re: Hualalai Elderly Housing Phase 2

Aloha Mr. Kato:

We are in receipt of your correspondence transmitting Cultural Surveys Hawai‘i, Inc.’s report entitled “Archaeological Inventory Survey for Hualalai Elderly Housing Phase II at a 4-acre parcel at ‘Auhau‘au‘au‘a, Kona, Hawaii Island.

A review of the data contained in the report substantiates the need to preserve the archaeological and cultural integrity of the Great Wall of Kuakini and the wall that serves as an ahupua‘a boundary. Both are significant cultural features that could be impacted by the proposed project if proper measures are not taken to mitigate adverse impacts. The consideration of a 10 meter buffer from the wall and preservation of the wall itself certainly appears to be measures that could preserve these significant features and as those measures have been used for Phase I of the project it would seem logical to continue use of the buffer for the second phase of the project.

You indicated in your correspondence that you applied for federal funding for this project and that you intend to execute a Memorandum of Understanding regarding treatment of the Great Wall of Kuakini. The National Historic Preservation Act (NHPA) requires consultation with native Hawaiian organizations, such as the Office of Hawaiian Affairs, early in the project and prior to expenditure of funds, on undertakings that might impact sites to which we have attached religious and cultural significance. Clearly Phase II of the
Hualalai Elderly Project has the potential to impact a culturally significant site and while your initial intent is to continue the previous mitigation measure, we would like to discuss the project and intent with you. By way of this letter, we are requesting formal consultation with you for this project under Section 106 of NHPA. Please contact Ms. Pikake Pelekai at (808) 594-1954 to arrange for the consultation. She can also be reached by facsimile at (808) 594-1865 or by e-mail at pikakepelekai@uloh.org.

Mahalo for the opportunity to review and comment on the report. We look forward to hearing from you shortly.

Sincerely,

[Signature]

Colin C. Kippen, Jr.
Deputy Administrator

cc: BOT
    Kona Office CRC
February 4, 2000

Mr. Brian T. Nishimura  
Planning Consultant  
101 Aupuni Street, Suite 217  
Hilo, HI 96720

Dear Mr. Nishimura:

SUBJECT: REQUEST FOR COMMENTS  
ENVIRONMENTAL ASSESSMENT FOR HUALALAI ELDERLY HOUSING  
PROJECT-PHASE II FOR LOW INCOME ELDERLY RESIDENTS IN  
KAILUA-KONA

This acknowledges your letter of January 19, 2000, requesting our comments on the proposed project.

Staff has reviewed your request and has no comments or objections to offer at this time.

Thank you for the opportunity to comment.

Sincerely,

WAYNE G. CARVALHO  
POLICE CHIEF

THOMAS J. HICKOX  
ASSISTANT POLICE CHIEF  
FIELD OPERATIONS BUREAU

DAF:lk
APPENDIX B - REPRODUCTION OF COMMENTS AND RESPONSES MADE DURING THE DRAFT ENVIRONMENTAL ASSESSMENT COMMENT PERIOD

August 28, 2000

Edwin Taira
Office of Housing and Community Development
50 Walluku Drive
Hilo, HI 96720

Dear Mr. Taira:

Subject: Draft Environmental Assessment (EA) for Hualalai Elderly Housing Project, Phase II

We have the following comments to offer:

1. Two-sided pages: In order to reduce bulk and conserve paper, we recommend printing on both sides of the pages in the final document.

2. Maps: In the final EA enclose maps of the neighborhood and the island, each indicating the location of the project site.

3. Segmentation: This project is called Phase II, to be located adjacent to phase I. Are additional phases planned? The Environmental Impact Statement law prohibits segmentation of larger projects and requires that full disclosure of impacts be made on projects in their entirety. Provide a full analysis and discussion of all related projects in the area.

4. Visual impacts: Include drawings or diagrams of the site, the proposed buildings and any proposed landscaping that show the final appearance of the project. We recommend landscaping with native Hawaiian plants and trees.

5. Contacts: In the final EA be sure to enclose copies of all correspondence made during the pre-consultation and consultation periods. Appendix A lists six attached letters, but only one is enclosed (US Fish & Wildlife Service). This is especially true for correspondence with the Historic Preservation Division of the DLNR regarding historic resources, and the Department of Health regarding the proposed septic system.
6. **Infrastructure improvements:** The applicant will grant the county Department of Public Works $100,000 for sidewalk and crosswalk improvements to Hualalai Road fronting the project. Will this be implemented by the time the building is completed? Given the fact that only a few of the residents will own cars, a timely completion is vital.

7. **Americans with Disabilities Act:** In the final EA indicate to what extent this project will be ADA-compliant.

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

Sincerely,

Genevieve Salmonson
Director

c: Brian Nishimura
Via fax to 808/586-4186
And U. S. Mail

Genevieve Salmonson, Director
State of Hawai‘i
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawai‘i 96813

SUBJECT: Hualalai Elderly Housing Project, Phase II
Draft Environmental Assessment (EA)

This is a follow-up to your letter of August 28, 2000, providing comments to the draft environmental assessment for the Hualalai Elderly Housing Project, Phase II. The Office of Housing and Community Development (OHCD) offers the following comments:

1. **Two-sided pages:** The final EA will be printed on both sides of the pages;

2. **Maps:** The final EA will include maps of the neighborhood and the island, each indicating the location of the project site;

3. **Segmentation:** No additional phases are planned for the Hualalai Elderly Housing Project. The only other related project in the area is the Phase I project;

4. **Visual Impacts:** A landscaping plan and schematic drawings of the units and common building will be provided in the final EA;
5. **Contacts:** Copies of all correspondence made during all consultation periods will be provided in the final EA. Those that were inadvertently left out of the draft EA will be included;

6. **Infrastructure Improvements:** The applicant is providing $100,000 to the County of Hawaii’s Department of Public (DPW) for improvements to the Hualalai Road. The DPW will determine how the money is to be used and when those improvements will be made. The applicant does not have any control over the use of these funds; and

7. **Americans with Disabilities Act:** The proposed project will be in compliance with the ADA requirements. Four of the thirty-six units will be designed and constructed as accessible units and the remaining units will be designed and constructed as adaptable.

Thank you for providing your comments on the draft EA for the Hualalai Elderly Housing Project, Phase II. If you should have any further questions or need additional information, please call Rex M. Jitchaku at 808/961-8379.

Edwin S. Taira  
Housing Administrator