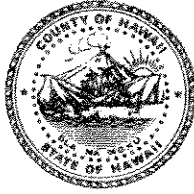


MAY - 8 2007



Harry Kim
Mayor

Christopher J. Yuen
Director

Brad Kurokawa, ASLA
LEED® AP
Deputy Director

County of Hawaii
PLANNING DEPARTMENT

101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720-3043
(808) 961-8288 • FAX (808) 961-8742

April 18, 2007

Honorable Genevieve Salmonson, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

RECEIVED
07 APR 23 P 3:20
OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

Dear Ms. Salmonson:

**Draft Environmental Assessment (DEA)
Pedestrian Path, Site Clearing and Landscaping for Ecommerce Enterprises
Tax Map Key: (3) 5-5-8: 66 & 67 North Kohala, Hawaii**

The Hawaii County Planning Department has reviewed the comments received during the 30-day public comment period, which began on January 23, 2007 - OEQC Publication Date. The agency has determined that this project will not have significant environmental effects and has issued a FONSI. Please publish this notice in the May 8, 2007 OEQC Environmental Notice.

We have enclosed a completed OEQC Publication Form, four copies of the Final Environmental Assessment (FEA), and the project summary hardcopy and on disk. If you have any questions, please call Jeff Darrow of this department at 961-8288 ext. 259.

Sincerely,


CHRISTOPHER J. YUEN
Planning Director

Encls. Final EA (4 copies)
Completed OEQC Publication Form
Project Summary (hard copy and on disk)

JWD:smn

\\Coh31\planning\public\wpwin60\CH343\2007\LMohammadi-FEA-FONSI.doc

cc: Steven S.C. Lim, Esq.
Ahmed Mohammadi
R.M. Towill Corporation (Chester Koga)

2007-05-08-HI - FEA -
Waipiele Pedestrian Pathway
**FINAL
ENVIRONMENTAL ASSESSMENT**

MAY - 8 2007

**PEDESTRIAN PATH, SITE CLEARING AND LANDSCAPING
Waipiele Gulch, North Kohala District, Island of Hawai'i
Tax Map Key: (3) 5-5-008, Parcel 66 and 67**

April 13, 2007

Accepting Authority

Planning Department
County of Hawai'i

Applicant:

Ecommerce Enterprises
Hawi, Hawai'i 96719
1-20232-0P

REGULATORY
QUALITY CONTROL

07 APR 23 P 3:20

RECEIVED

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SUMMARY OF PROPOSED ACTION

Project:	Construction of Pedestrian Path, Debris Clearing and Site Remediation
Landowner/Applicant	Ecommerce Enterprises Contact: Mr. Ahmad Mohammadi
Accepting Agency	Planning Department, County of Hawai'i Mr. Christopher Yuen, Director
Agent	R.M. Towill Corporation 420 Waiakamilo Road, Suite 411, Honolulu, Hawai'i 96817 Contact: Chester Koga, AICP
Location	Waipiele Gulch, North Kohala District, Island of Hawai'i
Tax Map Key	3-5-5-008: 066 and 067
Proposed Action	Construction of 2,000 lineal feet Pedestrian Path and Landscaping (grassing of exposed soils)
Land Area	TMK area: 40 acres; Construction area: 30,000 sq. ft.
Present Use	Vacant
State Land Use District	Conservation (Resource Subzone) and Agriculture
General Plan Land Use Designation	Important Agricultural Lands
Present Zoning	Agriculture-20 acres (A-20a)
Special Management Area	After-the-fact SMA Permit required
Anticipated Determination	Finding of No Significant Impact (FONSI)

SECTION 1

PROJECT DESCRIPTION

1.1 PURPOSE AND NEED

This Environmental Assessment (EA) has been prepared pursuant to Chapter 343, Hawai'i Revised Statutes, to address actions taken within the Special Management Area (SMA) as defined by the County of Hawai'i. A SMA Assessment was filed with the Planning Department and the Director determined that an after-the-fact SMA permit application was required for unauthorized clearing and grading in the SMA. This document and an SMA application is being filed with the County of Hawai'i.

On January 23, 2007 a notice of availability was filed in the Office of Environmental Quality Control's *Environmental Notice*. The public was invited to comment on the Draft EA until February 23, 2007. Comments received, and responses to the comments are included in Section 6.

1.2 PROJECT LOCATION

The project location is in Waipiele Gulch, North Kohala District, Island of Hawai'i. The site of the clearing and grading action is defined as Tax Map Key (3) 5-5-008, parcel 66 and 67. **Figure 1** shows the location of the project on the Island of Hawai'i. **Figure 2** show the tax map plat for the subject project. Access to the project area is via Hawi Road.

1.3 PROPOSED ACTION

The owner of the subject parcel re-constructed a graded roadway (pedestrian path), approximately 2,000 lineal feet, along the banks of Waipiele Gulch for pedestrian access to the shoreline without a Special Management Area permit. The County of Hawai'i has cited the landowner for performing work without a permit. The owner constructed the road in the belief that he was complying with the requirements of his subdivision approval that required the provision of a pathway from the subdivision to the shoreline. Without the pathway, however, public access would be hazardous and would be restricted by the landowner.

The objectives of the project are:

- a. Provide pedestrian access from the upper neighborhood to the shoreline,
- b. Provide a safe route for public access to the shoreline, and
- c. Provide compliance with subdivision conditions.

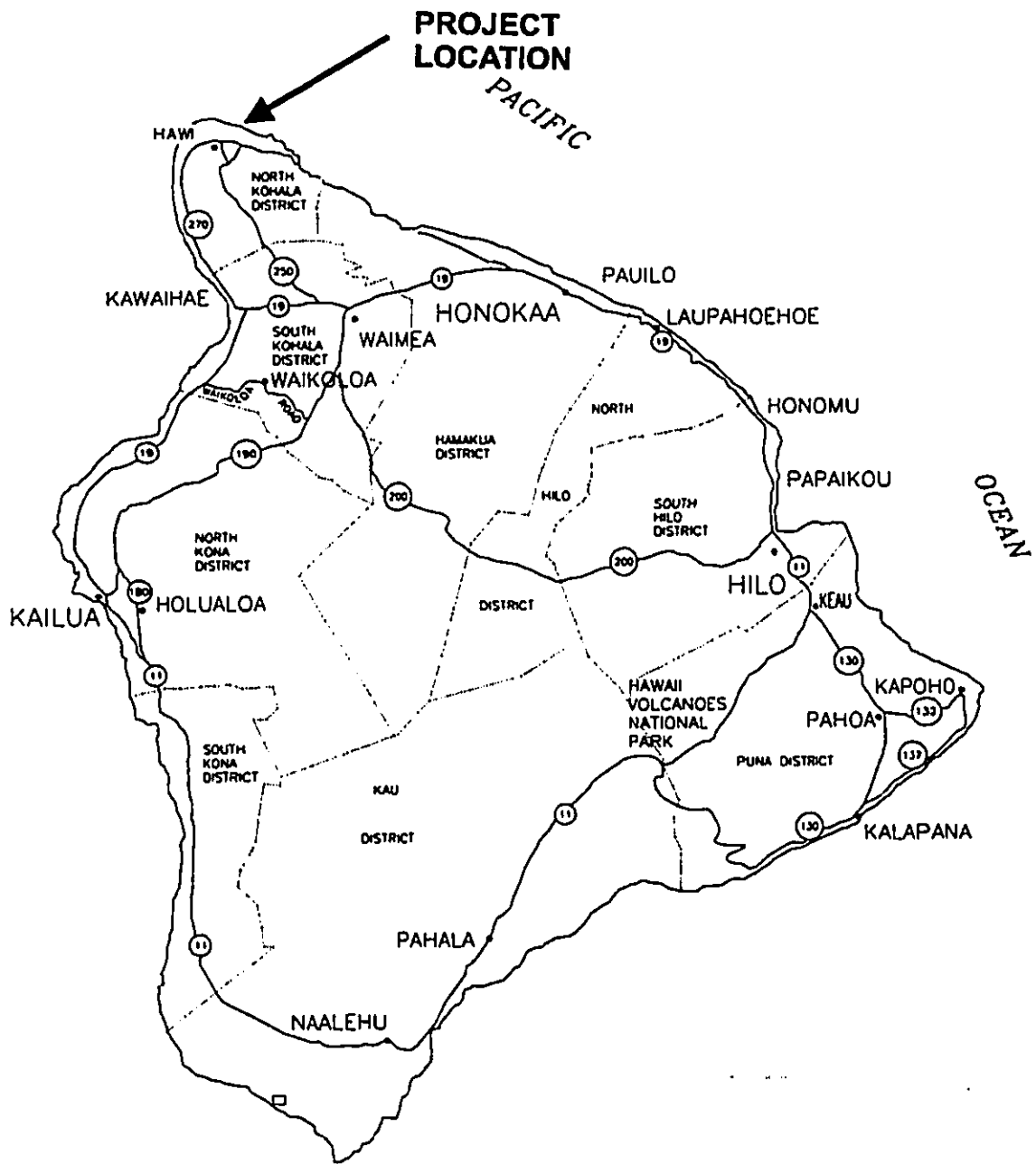


FIGURE 1
PROJECT LOCATION
 Island of Hawai'i



NOT TO SCALE

R. M. TOWILL CORPORATION

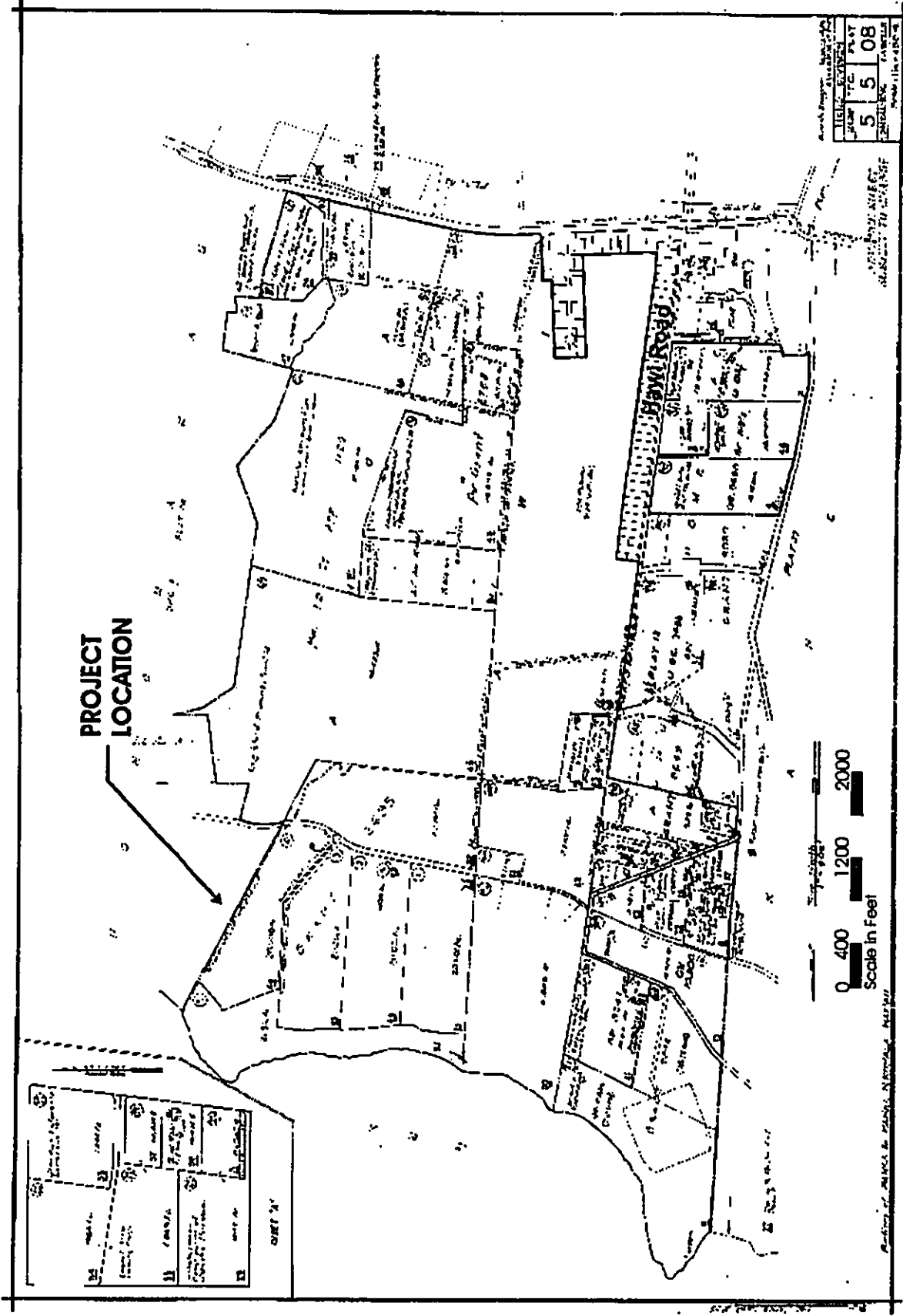


FIGURE 2
VICINITY MAP (Tax Map Key)

The pathway was graded along a former plantation service road used for the maintenance of the railway used by the sugarcane plantation. See **Figure 3 Subdivision Map and Figure 4A and 4B Roadway Plan (Grading Plan 1 and Grading Plan 2)**. Figure 2 shows the old railroad route which is not Uli Road. Figure 5 show photos of the trestle in Waipiele Gulch at the end of Uli Road.

Affidavits from area residents and the construction contractor attesting to the former road are attached in **Appendix A**. The Planning Department, County of Hawai'i, however, has indicated that it has information to the contrary. The pathway averages 15-20 feet wide with a net usable width of 10-12feet. The pathway was created by an equipment operator following the cross-slope path he observed at the project site. Grading of the road created vertical cuts at certain locations of more than 20 feet. The average cut is between 8 and 12 feet with certain areas exceeding 20 feet. See **Figure 4A & B**. A half-acre area along the shoreline (approximately 100 feet from the ocean) was cleared of accumulated natural and urban debris comprised of tree limbs, wooden material, metal products, plastic products, tires, paper products, etc.). The materials found along the shoreline are believed to have been carried by storm waters in the gulch and washed in by the ocean. The material cleared was hauled to a transfer station in Hawi. The owner was previously cited for clearing this area in the SMA without a permit. The cleared area has been since restored to pre-existing conditions, less the debris, by grassing (see Figure 7).

In August 2004, the landowners proceeded with the construction of an public access easement from the end of Uli Road into Waipiele Gulch. Construction of this access was prompted after the owner of an adjoining lot 5-5-28: 022, where the original access easement was to be located, revoked access across his property into the gulch effectively closing access to the shoreline.

In September 2004, the landowner was cited by the Planning Department for performing work in the Special Management Area without a permit.

The owner was also cited by the Department of Land and Natural Resources (DLNR) for clearing within the Conservation District. The owner has resolved his citation with the DLNR through the preparation and implementation of a Remediation Plan that included the re-vegetation of the cleared area and payment of a fine.

A plan for the remediation of exposed soil was prepared and submitted to the Planning Department in December 2004. Upon approval of the remediation plan by the County, the owner took action to stabilize the fill side of the cut pathway with geotextile fabric and planted with grass. An irrigation system was installed during the initial phases to facilitate plant growth. See Figure 6. Progress reports were submitted to the County in June and September 2005 showing the installed geotextile fabric, plant growth and irrigation system.

Stabilization of the cut slopes has involved site visits, meetings, and development of plans in consultation with the Department of Public Works (DPW). The following proposals have been discussed with DPW: 1) protecting the cut slopes with a chainlink fence to serve as a barrier and to "capture" falling rocks, or 2) a "Jersey" barrier to

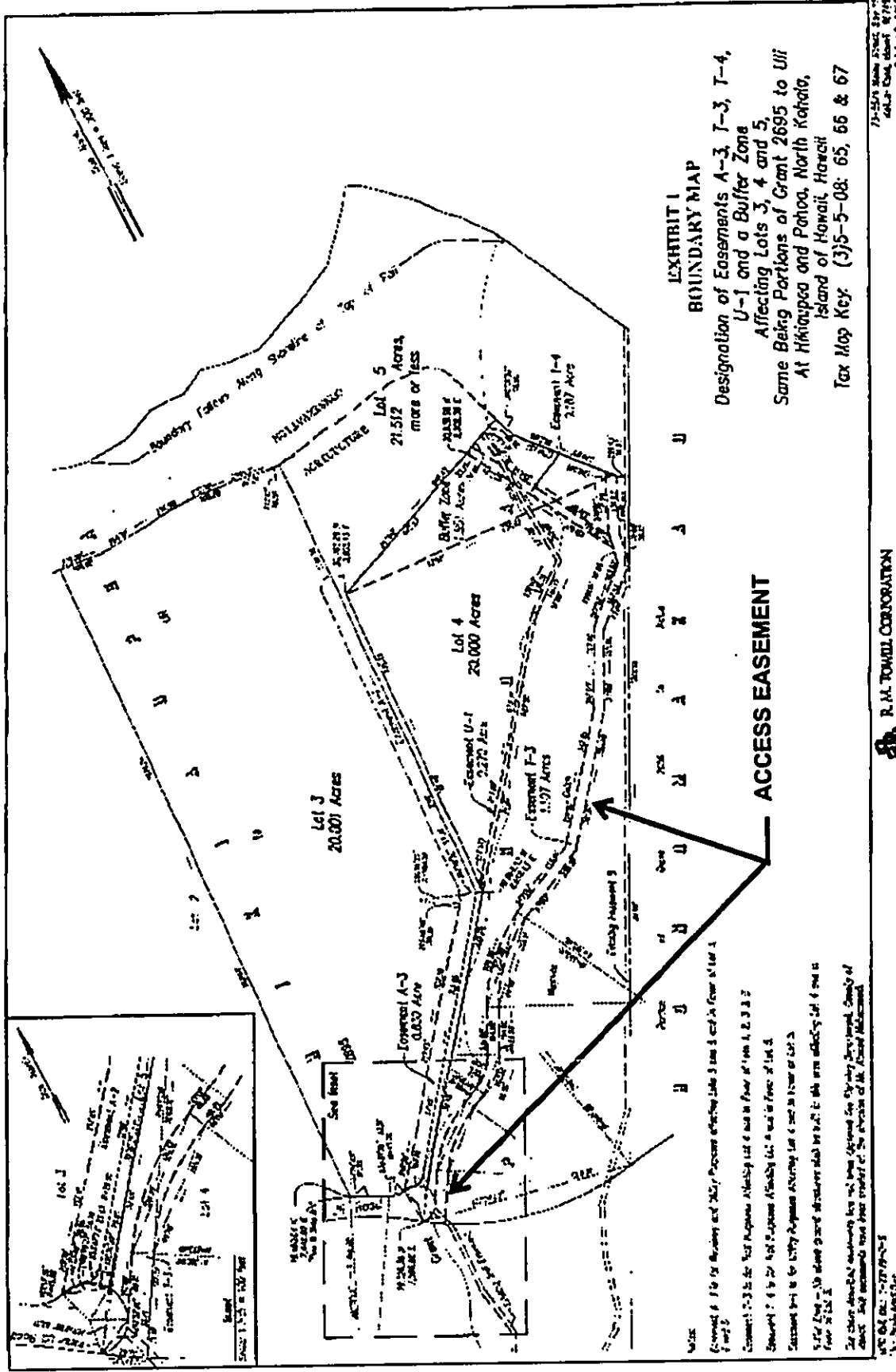
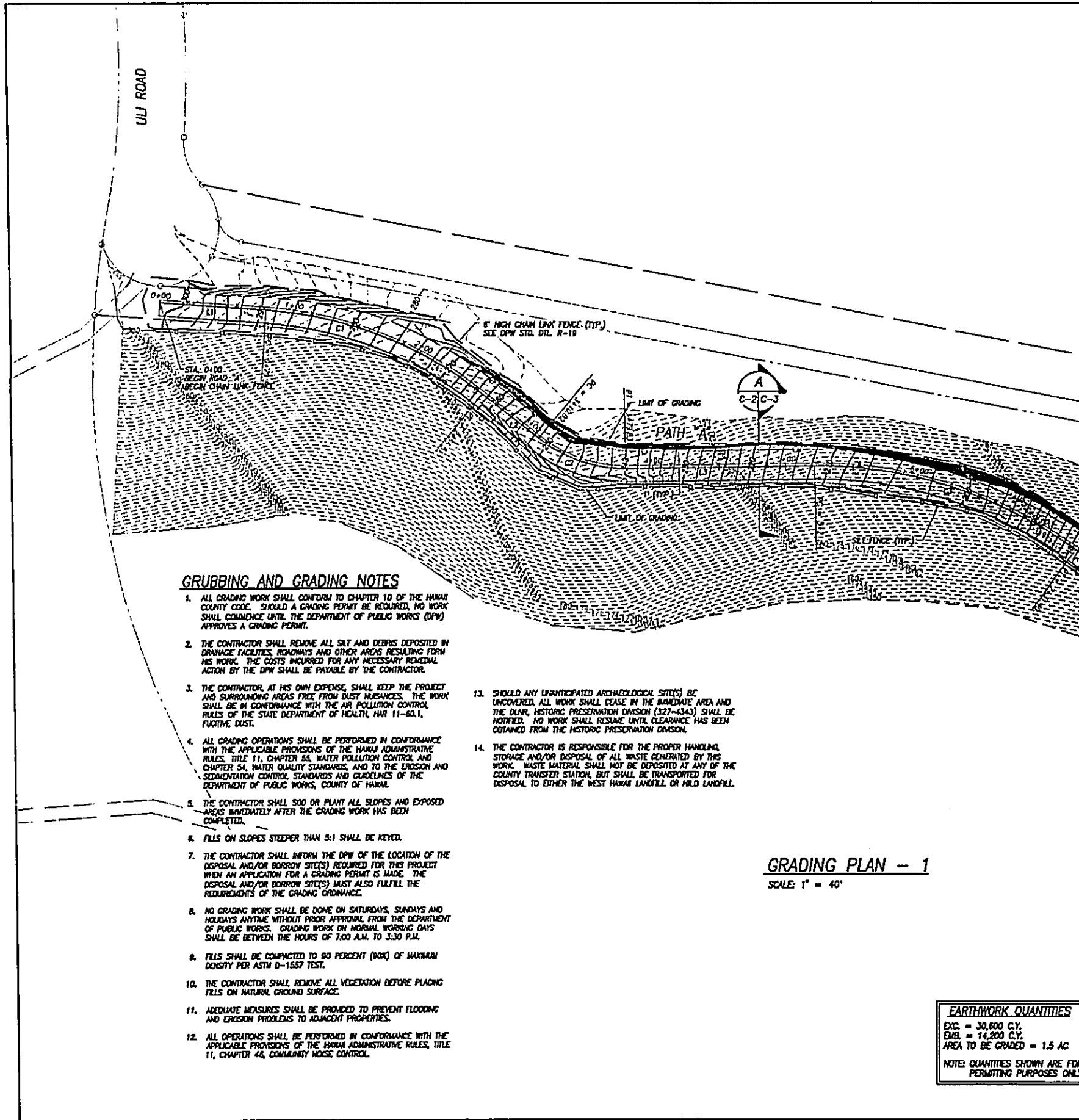


FIGURE 3. SUBDIVISION MAP SHOWING ACCESS EASEMENT

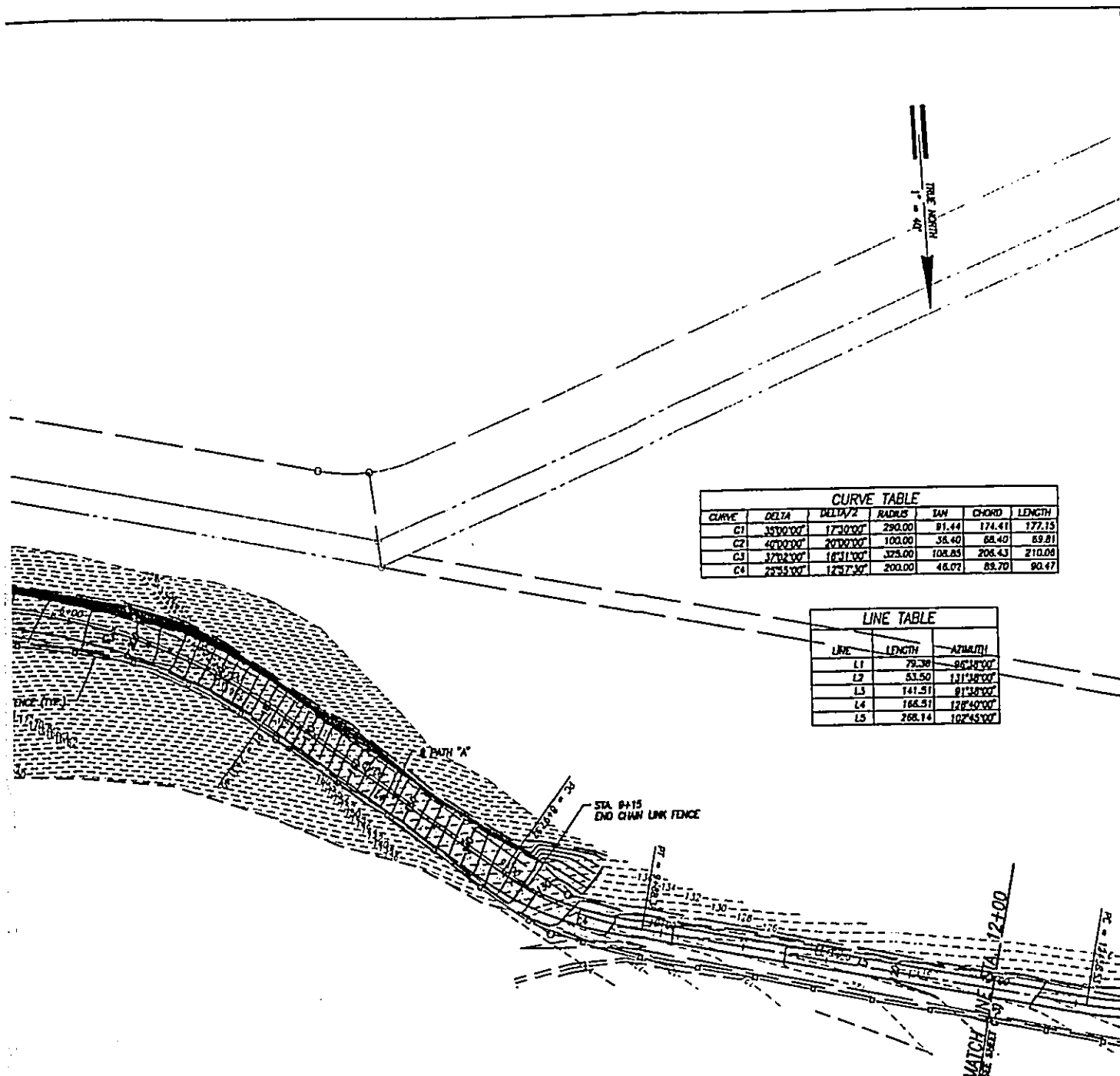


GRUBBING AND GRADING NOTES

1. ALL GRADING WORK SHALL CONFORM TO CHAPTER 10 OF THE HAWAII COUNTY CODE. SHOULD A GRADING PERMIT BE REQUIRED, NO WORK SHALL COMMENCE UNTIL THE DEPARTMENT OF PUBLIC WORKS (DPW) APPROVES A GRADING PERMIT.
2. THE CONTRACTOR SHALL REMOVE ALL SILT AND DEBRIS DEPOSITED IN DRAINAGE FACILITIES, ROADWAYS AND OTHER AREAS RESULTING FROM HIS WORK. THE COSTS INCURRED FOR ANY NECESSARY REMEDIAL ACTION BY THE DPW SHALL BE PAYABLE BY THE CONTRACTOR.
3. THE CONTRACTOR, AT HIS OWN EXPENSE, SHALL KEEP THE PROJECT AND SURROUNDING AREAS FREE FROM DUST NUISANCES. THE WORK SHALL BE IN CONFORMANCE WITH THE AIR POLLUTION CONTROL RULES OF THE STATE DEPARTMENT OF HEALTH, HAR 11-60.1, FUGITIVE DUST.
4. ALL GRADING OPERATIONS SHALL BE PERFORMED IN CONFORMANCE WITH THE APPLICABLE PROVISIONS OF THE HAWAII ADMINISTRATIVE RULES, TITLE 11, CHAPTER 55, WATER POLLUTION CONTROL AND CHAPTER 54, WATER QUALITY STANDARDS, AND TO THE EROSION AND SEDIMENTATION CONTROL STANDARDS AND GUIDELINES OF THE DEPARTMENT OF PUBLIC WORKS, COUNTY OF HAWAII.
5. THE CONTRACTOR SHALL SOO OR PLANT ALL SLOPES AND EXPOSED AREAS IMMEDIATELY AFTER THE GRADING WORK HAS BEEN COMPLETED.
6. FILLS ON SLOPES STEEPER THAN 5:1 SHALL BE KEYS.
7. THE CONTRACTOR SHALL INFORM THE DPW OF THE LOCATION OF THE DISPOSAL AND/OR BORROW SITE(S) REQUIRED FOR THIS PROJECT WHEN AN APPLICATION FOR A GRADING PERMIT IS MADE. THE DISPOSAL AND/OR BORROW SITE(S) MUST ALSO FULFILL THE REQUIREMENTS OF THE GRADING ORDINANCE.
8. NO GRADING WORK SHALL BE DONE ON SATURDAYS, SUNDAYS AND HOLIDAYS ANYTIME WITHOUT PRIOR APPROVAL FROM THE DEPARTMENT OF PUBLIC WORKS. GRADING WORK ON NORMAL WORKING DAYS SHALL BE BETWEEN THE HOURS OF 7:00 A.M. TO 3:30 P.M.
9. FILLS SHALL BE COMPACTED TO 80 PERCENT (W80) OF MAXIMUM DENSITY PER ASTM D-1557 TEST.
10. THE CONTRACTOR SHALL REMOVE ALL VEGETATION BEFORE PLACING FILLS ON NATURAL GROUND SURFACE.
11. ADEQUATE MEASURES SHALL BE PROVIDED TO PREVENT FLOODING AND EROSION PROBLEMS TO ADJACENT PROPERTIES.
12. ALL OPERATIONS SHALL BE PERFORMED IN CONFORMANCE WITH THE APPLICABLE PROVISIONS OF THE HAWAII ADMINISTRATIVE RULES, TITLE 11, CHAPTER 46, COMMUNITY NOISE CONTROL.
13. SHOULD ANY UNANTICIPATED ARCHAEOLOGICAL SITE(S) BE UNCOVERED, ALL WORK SHALL CEASE IN THE IMMEDIATE AREA AND THE DLNR, HISTORIC PRESERVATION DIVISION (327-4343) SHALL BE NOTIFIED. NO WORK SHALL RESUME UNTIL CLEARANCE HAS BEEN OBTAINED FROM THE HISTORIC PRESERVATION DIVISION.
14. THE CONTRACTOR IS RESPONSIBLE FOR THE PROPER HANDLING, STORAGE AND/OR DISPOSAL OF ALL WASTE GENERATED BY THIS WORK. WASTE MATERIAL SHALL NOT BE DEPOSITED AT ANY OF THE COUNTY TRANSFER STATION, BUT SHALL BE TRANSPORTED FOR DISPOSAL TO EITHER THE WEST HAWAII LANDFILL OR HILD LANDFILL.

GRADING PLAN - 1
SCALE: 1" = 40'

EARTHWORK QUANTITIES
EXC. = 30,600 C.Y.
EMB. = 14,200 C.Y.
AREA TO BE GRADED = 1.5 AC
NOTE: QUANTITIES SHOWN ARE FOR PERMITTING PURPOSES ONLY.



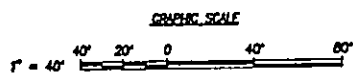
CURVE TABLE						
CURVE	DELTA	DELTA/2	RADIUS	SW	CHORD	LENGTH
C1	38°02'00"	19°01'00"	290.00	81.44	174.41	177.15
C2	40°02'00"	20°01'00"	100.00	38.40	68.40	69.81
C3	37°02'00"	18°31'00"	325.00	104.85	208.43	210.08
C4	22°53'00"	12°57'30"	200.00	46.07	88.70	90.47

LINE TABLE		
LINE	LENGTH	AZIMUTH
L1	79.38	95°11'00"
L2	53.50	131°32'00"
L3	141.51	81°30'00"
L4	165.51	128°40'00"
L5	266.14	102°43'00"

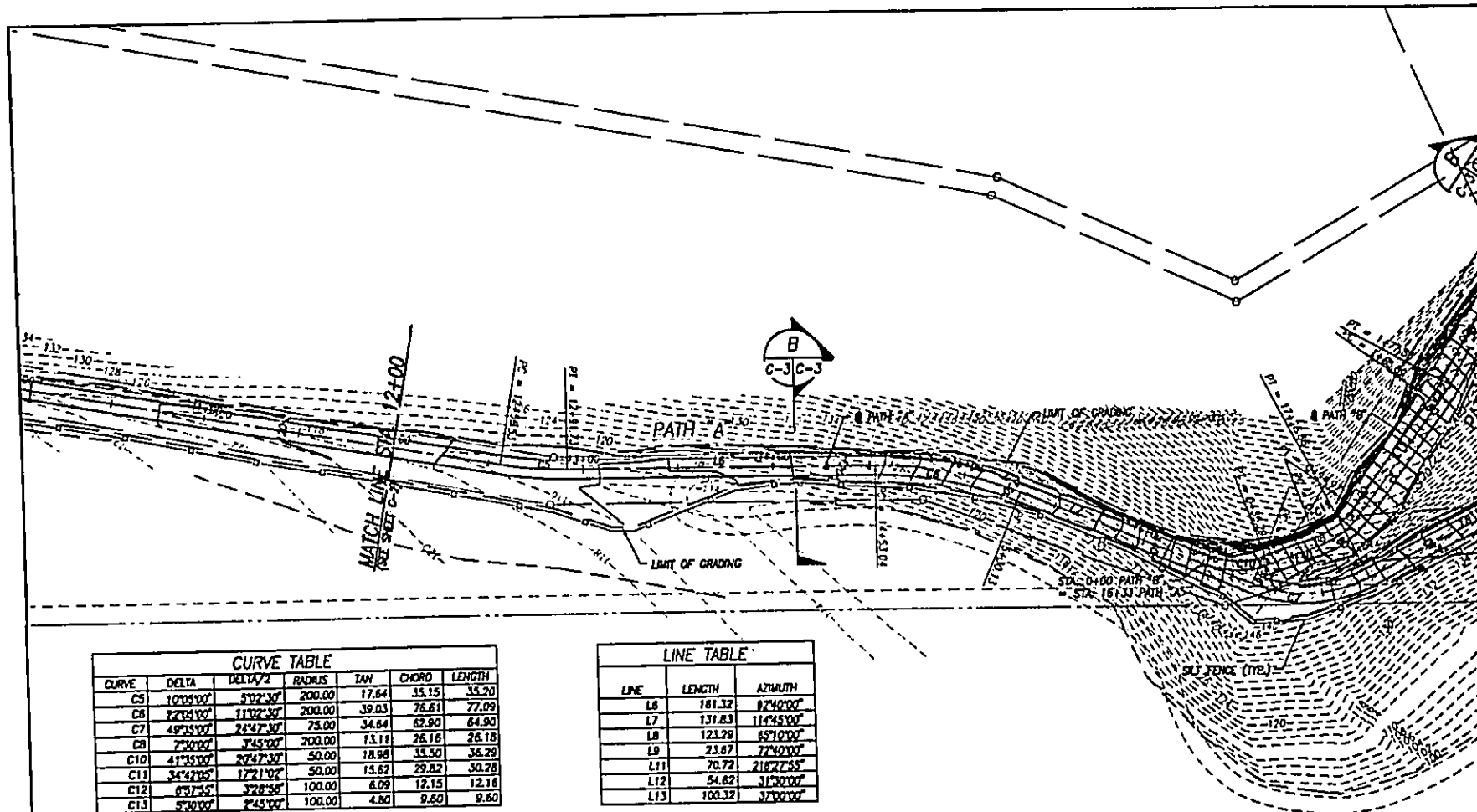
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EARTHWORK QUANTITIES
 EXC. = 30,600 C.Y.
 EMB. = 14,200 C.Y.
 AREA TO BE GRADED = 1.5 AC
 NOTE: QUANTITIES SHOWN ARE FOR PERMITTING PURPOSES ONLY

LEGEND
 —1710— FINISHED GRADE CONTOUR
 - - -1710- - - EXISTING CONTOUR



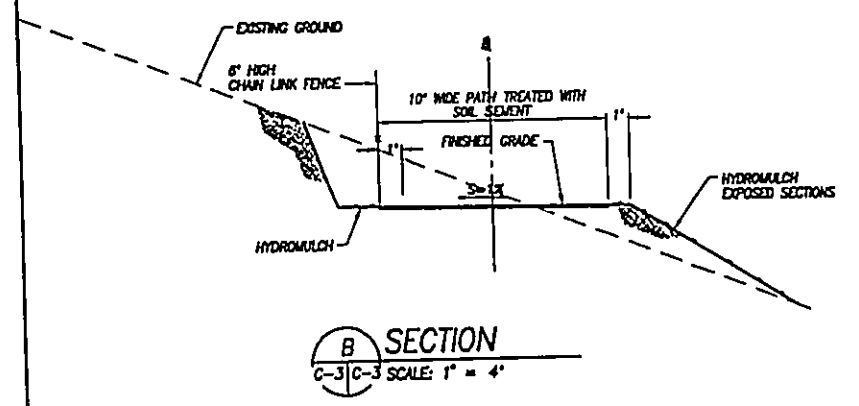
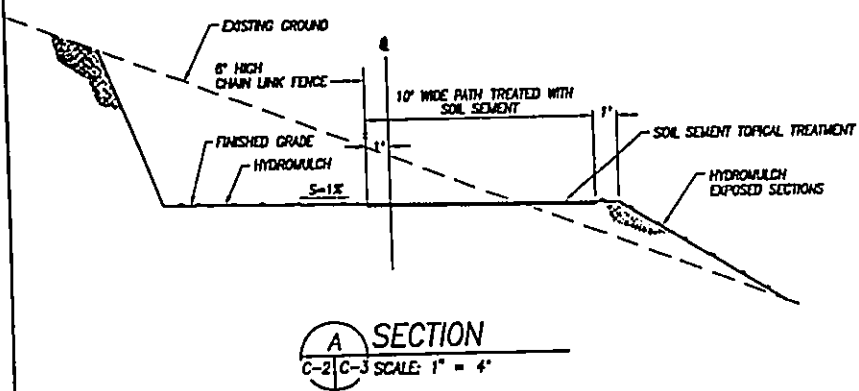
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DRAWERMAN	LJM				
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		REVISION	DATE	DESCRIPTION	BY
 R. M. TOWILL CORPORATION <small>800 643 1123 440 Waikeolu Road, Suite 400, Honolulu, Hawaii 96815</small>					
E. COMMERCE ENTERPRISES, CORPORATION <small>P. O. BOX 190585 HAWAII, HAWAII 96719</small>					
PEDESTRIAN PATH GRADING PLANS <small>TWK: 5-5-008:013 HOKAUPA AND PAHUA, NORTH KOHALA</small>					
<h2>FIGURE 4 A</h2> <h3>GRADING PLAN - 1</h3>					
APPROVED BY					
DATE	DATE	DATE	DATE	DATE	DATE



CURVE TABLE						
CURVE	DELTA	DELTA/2	RADIUS	TAN	CHORD	LENGTH
C5	10°05'00"	5°02'30"	200.00	17.64	35.15	35.20
C6	22°05'00"	11°02'30"	200.00	39.03	76.61	77.09
C7	49°35'00"	24°47'30"	75.00	34.84	62.90	64.90
C8	7°30'00"	3°45'00"	200.00	13.11	26.16	26.18
C10	41°35'00"	20°47'30"	50.00	18.98	35.50	36.29
C11	34°42'00"	17°21'00"	50.00	15.62	29.82	30.78
C12	6°37'35"	3°18'50"	100.00	6.09	12.15	12.18
C13	5°30'00"	2°45'00"	100.00	4.80	9.60	9.60

LINE TABLE		
LINE	LENGTH	AZIMUTH
L6	181.32	82°40'00"
L7	131.83	114°45'00"
L8	121.29	65°10'00"
L9	23.87	72°40'00"
L11	70.72	218°27'55"
L12	54.82	31°30'00"
L13	100.32	37°00'00"

GRADING PLAN - 2
SCALE: 1" = 40'

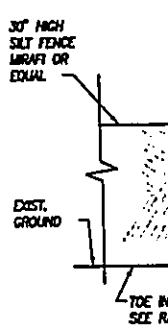


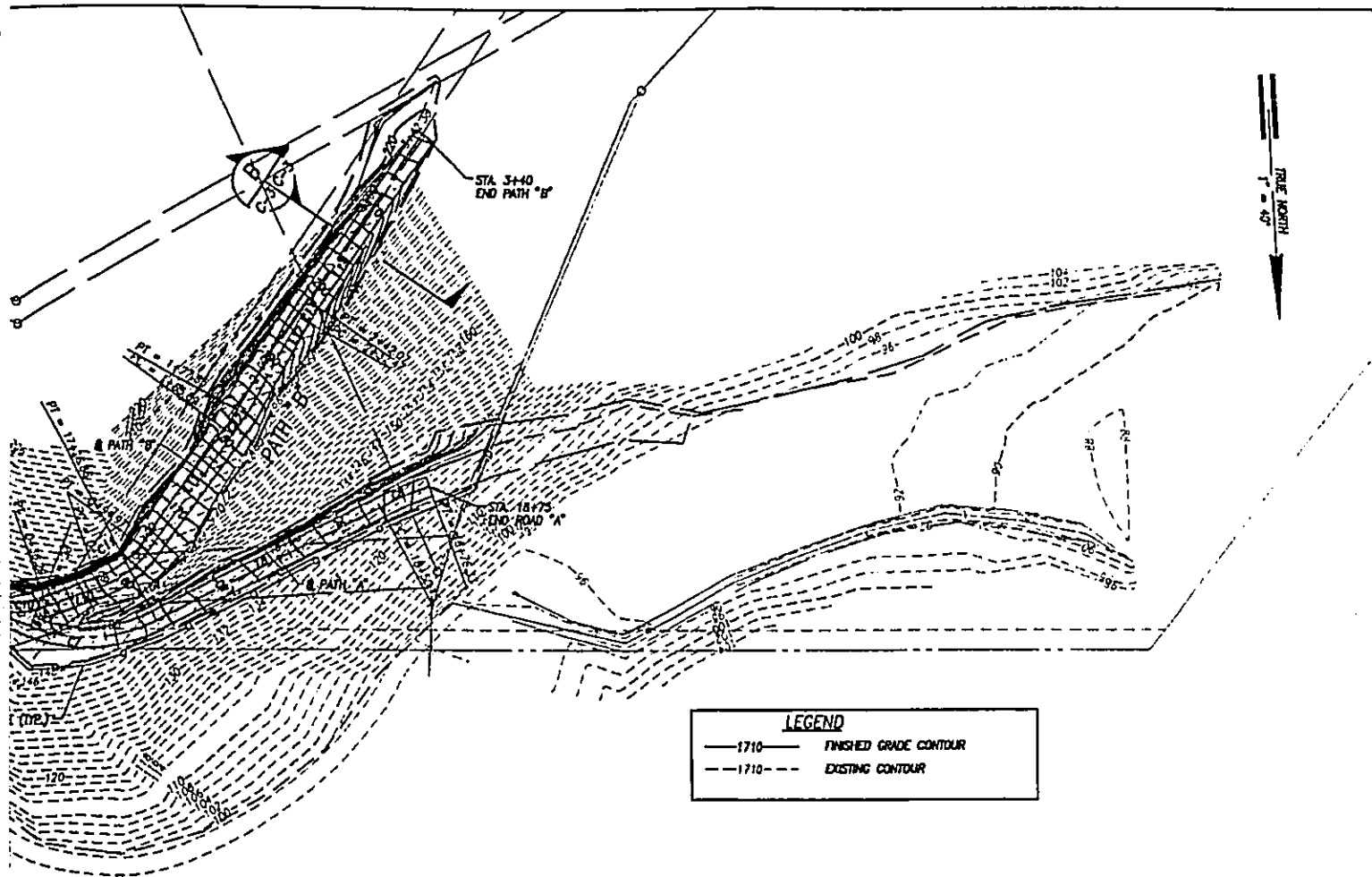
ENVIRONMENTAL PROTECTION NOTES

- IN ACCORDANCE WITH CHAPTER 11-60.1, AIR POLLUTION CONTROL, TITLE 11, STATE ADMINISTRATIVE RULES, THE PROPERTY OWNER/DEVELOPER SHALL BE RESPONSIBLE FOR ENSURING THAT EFFECTIVE CONTROL MEASURES ARE PROVIDED TO MINIMIZE OR PREVENT ANY VISIBLE DUST EMISSION CAUSED BY THE CONSTRUCTION WORK FROM IMPACTING THE SURROUNDING AREAS INCLUDING THE OFF-SITE ROADWAYS USED TO ENTER/EXIT THE PROJECT. THESE MEASURES INCLUDE BUT ARE NOT LIMITED TO THE USE OF WATER WAGON, SPRINKLER SYSTEMS, DUST FENCES, ETC.
- IN ACCORDANCE WITH CHAPTER 11-35, WATER POLLUTION CONTROL AND CHAPTER 11-34, WATER QUALITY STANDARDS, TITLE 11, STATE ADMINISTRATIVE RULES, THE PROPERTY OWNER/DEVELOPER SHALL BE RESPONSIBLE FOR ENSURING THAT THE BEST MANAGEMENT PRACTICE (BMP) TO MINIMIZE OR PREVENT THE DISCHARGE OF SEDIMENTS, DEBRIS, AND OTHER WATER POLLUTANTS INTO STATE WATERS IS PROVIDED.
- IN ACCORDANCE WITH CHAPTER 11-50.1, SOLID WASTE MANAGEMENT CONTROL, TITLE 11, STATE ADMINISTRATIVE RULES, THE PROPERTY OWNER/DEVELOPER SHALL BE RESPONSIBLE FOR ENSURING THAT GRUB MATERIAL, DEMOLITION WASTE AND CONSTRUCTION WASTE GENERATED BY THE PROJECT ARE DISPOSED OF IN A MANNER OR AT A SITE APPROVED BY THE STATE DEPARTMENT OF HEALTH. DISPOSAL OF ANY OF THESE WASTES BY BURNING IS PROHIBITED.

EROSION CONTROL BEST MANAGEMENT PRACTICES (BMP)

- TEMPORARY**
- PRIOR TO CLEARING LAND FOR GRADING, SILT FENCES SHALL BE INSTALLED.
 - STABILIZED ENTRY/EXIT DRIVEWAY SHALL BE ESTABLISHED PRIOR TO CLEARING OPERATIONS.
 - SILT WHICH HAS ACCUMULATED ALONG THE SILT FENCES SHALL BE REMOVED AND DISPOSED OF ON A BI-WEEKLY BASIS.
 - WHEN CLEARED OR GRUBBED AREAS ARE NOT TO BE GRADED OR DISTURBED FOR 30 DAYS OR MORE, SEED, PLANT, OR HYDROSEED TEMPORARY VEGETATION, UNLESS REMAINING NATURAL VEGETATION PROVIDES ADEQUATE PROTECTION.
- PERMANENT**
EXPOSED AREAS WILL BE PERMANENTLY GRASSED.



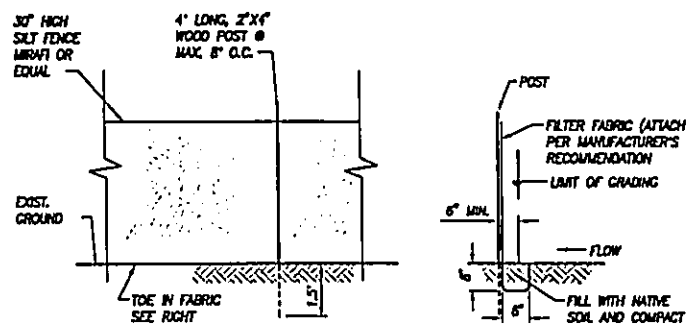


IG PLAN - 2

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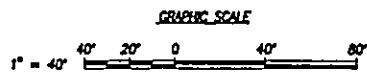
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TEMPORARY SILT FENCE NOTES:

1. FILTER FABRIC SHALL BE MIRAFI BODY OR EQUIVALENT AND SHALL BE INSTALLED WITH A SUPPORT NET OF POLYESTER NETTING OR APPROVED EQUAL. THE FILTER FABRIC SHALL BE A MINIMUM OF 36" WIDE AND THE SUPPORT NET A MINIMUM OF 30".
2. IF SILT FENCE IS OBTAINED FROM A MANUFACTURER AS A PACKAGE (I.E. FABRIC ATTACHED TO POSTS), THE MANUFACTURER'S INSTALLATION INSTRUCTIONS SHALL BE ADHERED TO.
3. POSTS SHALL BE METAL WHENEVER POSSIBLE. CROSS SECTION OF POSTS SHALL BE SUBSTANTIAL ENOUGH TO SUPPORT A LOADED SILT FENCE WITHOUT BENDING. POST SPACING SHALL BE 4' TO 8', DEPENDING ON POST SIZE.
4. TEMPORARY SILT FENCE SHALL BE INSTALLED PRIOR TO BEGINNING OF GRADING WORK AND SHALL NOT BE REMOVED UNTIL PERMANENT GRASSING HAS BEEN ESTABLISHED.

TEMPORARY SILT FENCE 1
SCALE: 1" = 4'



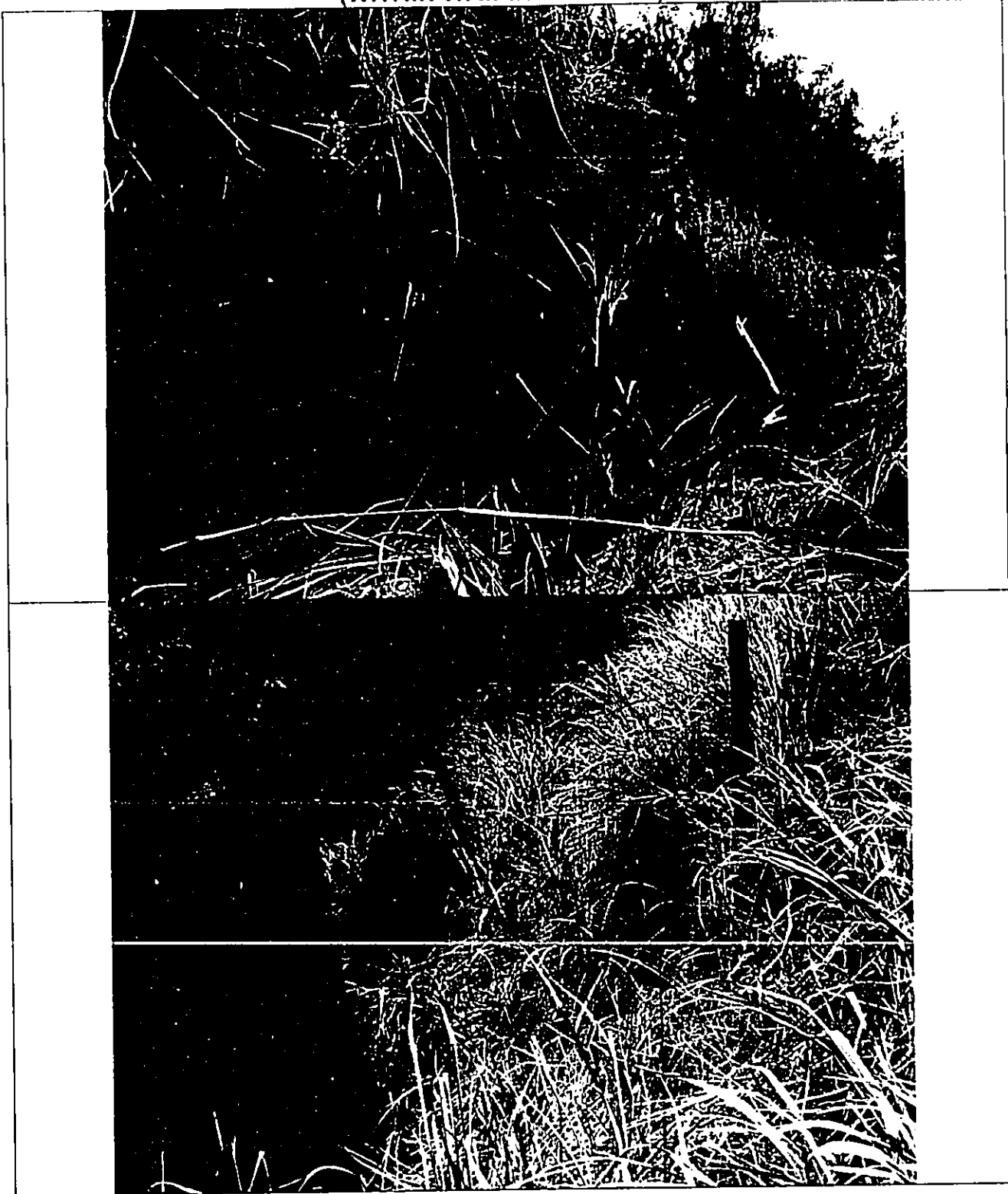
TEMPORARY DUST CONTROL

1. THE GRADED OR PROJECT SITE THAT IS CLEARED OF VEGETATION SHALL BE KEPT DAMP FOR SEVEN (7) DAYS A WEEK. AT THE END OF EACH DAY, THE SITE SHALL BE SUFFICIENTLY DAMPENED SO THAT THE SITE WILL REMAIN MOISTENED DURING THE NIGHT.
2. THE CONTRACTOR SHALL CONDUCT HIS OPERATIONS SO THAT EXCAVATION, EMBANKMENT, AND IMPORTED MATERIAL SHALL BE DAMPENED TO PREVENT DUST PROBLEMS.
3. IN APPLYING FOR A GRADING PERMIT, THE CONTRACTOR SHALL SUBMIT PLANS, SCHEDULES AND/OR WRITTEN MEASURES WHICH PROVIDE FOR DUST CONTROLS. THE DUST CONTROL MEASURES SHALL CONTAIN POSITIVE STATEMENTS WHICH REQUIRE ACTIONS OR WORK THAT PREVENT DUST PROBLEMS. NO PERMITS WILL BE ISSUED UNLESS THE COUNTY IS ASSURED THAT THE DUST PROBLEMS WILL BE MINIMIZED.

ENGINEER	LJM	REVISION	DATE	BY	APPROVED
DRAFTSMAN	LJM				
CHECKED BY	GTR				
 R. M. TOWILL CORPORATION <small>Surveying • Engineering • Subcontract Services • Professional • Consulting • Construction Management</small> 2825 Kalia Road, Suite 201, Honolulu, Hawaii 96815-1000 E. COMMERCE ENTERPRISES, CORPORATION P. O. BOX 190585 HAWAII, HAWAII 96719 PEDESTRIAN PATH GRADING PLANS TWC: 5-5-008:013 HIKAUPEA AND PAHOA, NORTH KOHALA					
FIGURE 4 B GRADING PLAN - 2					
APPROVED BY: _____ DESIGNED BY: _____ DATE: _____ CHECKED BY: _____ DATE: _____					
THE WORK WAS PREPARED BY ME OR UNDER MY SUPERVISION SIGNATURE: _____ DATE: _____					

PL	POST	PLBP	MS
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FIGURE 5
PHOTOGRAPHS OF FORMER RAILROAD TRESTLE PIERS
(WITHIN WAIPIELE GULCH)



protect against rock fall events in the same manner as the fence. The fence or wall will be installed where cuts are greater than 15 feet. Because both the fence and barrier are flexible, the energy of the falling rocks hitting the barriers will be absorbed. See **Figure 4**. The proposed action was settled upon based on the projected low number of users and the low frequency of use (less than 2 times per week, mostly weekends).

Estimated Value of the proposed project:

a.	Grading	\$ 9,600
b.	Design Fees	\$15,000
c.	Remediation Costs	<u>\$10,000</u>
	Total	\$34,600

1.4 ALTERNATIVE CONSIDERED

1.4.1 ALTERNATIVES TO THE PROPOSED ACTION

Other than the No Action Alternative or construction in another location on the subject parcel, no other alternatives were considered. The constructed pedestrian pathway was graded to conform to the contour of the land with minimal long term environmental impacts. The constructed pathway follows a formerly graded roadway as stated above. A neighbor to the west was initially contacted to assist in providing land for this access easement but declined to participate. The pathway provided in the condition of subdivision was originally 10 feet wide. Alternatives to slope protection on the cut-side include consideration of 1) constructing a retaining wall, 2) creating "benches," 3) fence "netting," 4) Jersey barrier, and 5) chainlink fence barrier. The selection of a preferred alternative included consideration of the volume of traffic and the general stability of the soils. Based on the experience of the owner, no requests for use were received in the previous 12 months. The owners personal use was also limited to once a month. The owner has also reported that during the period following construction the slopes have been stable without evidence of slides. The preferred solution selection was based on the low volume of traffic and the observed stability of the cut slope.

Evaluation:

- 1) Retain Wall. Construction of a retaining wall was rejected because of the additional grading and trenching to place the foundation that would be required to place the wall.
- 2) Creating Benches. This alternative was rejected because the additional grading that would be required to cut benches above and below the pathway. Further, the slopes above the cut areas would require clearing to accommodate the benches.
- 3) Fence Netting Along Slopes. The placement of fence netting to trap falling rocks would also require clearing above the cut area. Exposing the ground above the cuts could lead to erosion and therefore this alternative was rejected.
- 4) Jersey Barrier. This alternative was considered a viable solution to rockfall events. The Jersey barrier would serve to "capture" falling rocks and to protect persons walking on the roadway.

5) Chainlink Fence. The installation of a chainlink fence along the cut slopes would serve the same function at the Jersey barriers. The chainlink fence can also be installed in conjunction with the Jersey barriers.

1.4.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the subject property would remain undeveloped and access to the shoreline would be limited and the owner would not meet the conditions of his subdivision approval.

SECTION 2

EXISTING CONDITION

2.1 TOPOGRAPHY

The side slopes of the Waipiele Gulch averages between 15 to 45+ percent. The portion of the gulch within the subject property is narrow towards the back, and begins to flare out as it approaches the shoreline. The pathway was cut along and across the contours of the gulch until it levels at bottom of the gulch. The topography within the gulch is characterized by steep walls, with a slightly sloping shoreline area. The shoreline is composed mostly of weathered basalt boulders.

Potential Impacts and Proposed Mitigation

The fill slopes of the road were covered with a geotextile fabric to stabilize the soil. In addition, the slopes were planted with grass to further stabilize the soil. An irrigation system was installed to facilitate plant growth as the rainfall in the area is limited. During construction, silt fences were installed to minimize runoff into the intermittent stream and into the ocean.

2.2 SOILS

Soil at the property are classified as "Rough Broken Land" (RB), which is characterized as a miscellaneous land type that occur in gulches. The soil type ranges from very shallow to deep. Stones and rock outcrops are common and ranges from near sea level to 3,000 feet. (U.S. Department of Agriculture, 1973).

Potential Impacts and Proposed Mitigation

The project did not impact existing soil conditions at the project site. The soil characteristics are such that it is not prone to erosion. Further, the low rainfall in the area and the rocky nature of the soils minimizes soil erosion from earthwork. The cut slopes will not be further graded, rather, a fence or barrier will be installed to protect against falling rocks and slides.

2.3 RAINFALL

Rainfall in the region is less than 50 inches per year. Because of the low rainfall, soil erosion will be minimal and no other impacts are anticipated. To assist in the remediation of the fill and cut slopes, an irrigation system was installed to facilitate the growing of grass on the banks.

2.4 EXISTING LAND USE

The coastal area is used for fishing and other recreational pursuits, however, not regularly. There is no vehicular access or generally safe access to the rocky shoreline from a public road. There is no lateral access across the subject property. The shoreline terrain is characterized by the gulch with plateaus above. The shoreline is characterized by high cliffs which are not negotiable, except for the most experienced rock climbers. Refer to site photographs, **Figure 6, 7 and 8**. There are no public services available at the shoreline. Water and food need to be carried in. An archaeological study of the area was not conducted. The pathway will provide access to the shoreline that would be otherwise not be available. During construction no human skeletal remains or cultural features were found during site work. Should historic or cultural features be discovered during maintenance work, the Historic Site Division will be contacted. Remnants of the old railroad trestle that crossed the gulch are still present and were left undisturbed (see Figure 5).

The gulch is presently devoid of structures. There are several mature ironwood trees, scattered shrubbery and expanses of grass sloping downward to the ocean. The predominant land feature is Waipiele Gulch on the north boundary of the property. The western boundary of the property is the ocean. There is a single family residence on Parcel 67.

Primary access to the property is from Akoni Pule Highway (State Route 270) and through the town of Hawi. The Akoni Pule Highway is a two-lane, State of Hawai'i facility. The urban centers of the Island of Hawai'i are to the west and east of the subject parcel. The closest town, Hawi, is located 2 miles to the south. (See Figure 2).

Access to the project area is via Hawi Road. From Hawi Road access to the project area is via Uli Road. The new pathway starts at the end of a cul-de-sac on Uli Road.

Potential Impacts and Proposed Mitigation

The project is not expected to impact existing land use. With the cessation of construction activities, the vegetation in the gulch was allowed to naturalize. Periodic maintenance is anticipated to keep the grass trimmed, as necessary. Tree limbs that fall onto the roadway will be cleared.

2.5 WATER RESOURCES

The stream within Waipiele Gulch is classified as intermittent. The stream is normally dry since all of the stream flow has been diverted into the Kohala Ditch system. Further, upstream of the project site the County of Hawai'i operates a landfill. Until recently the only water flow in the gulch was during the draining of upstream aquaculture operation which occurred approximately once a month. This operation has since terminated.

Figure 6. Site Photos Before Remediation

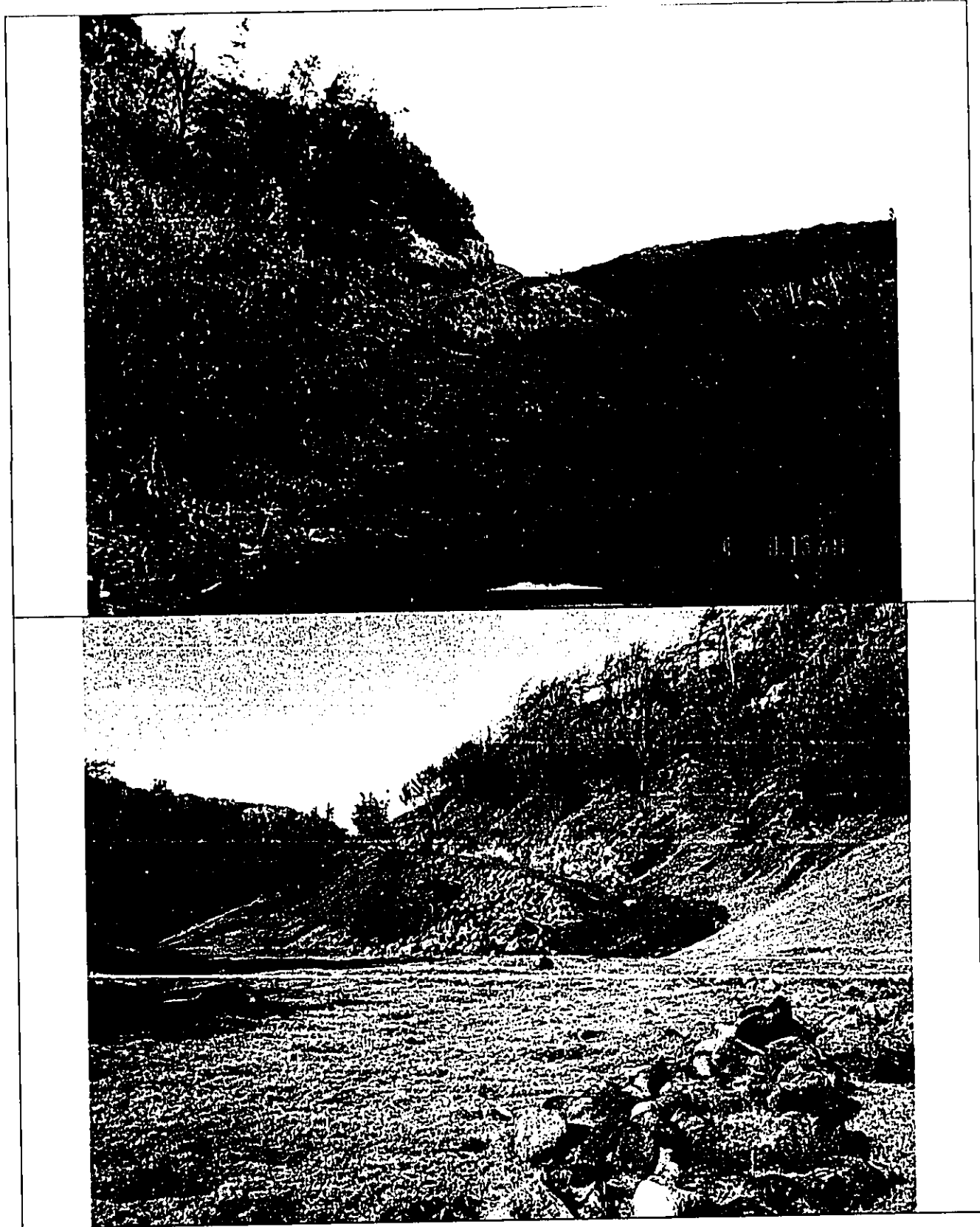


Figure 7. Slope Stabilization Remediation Action

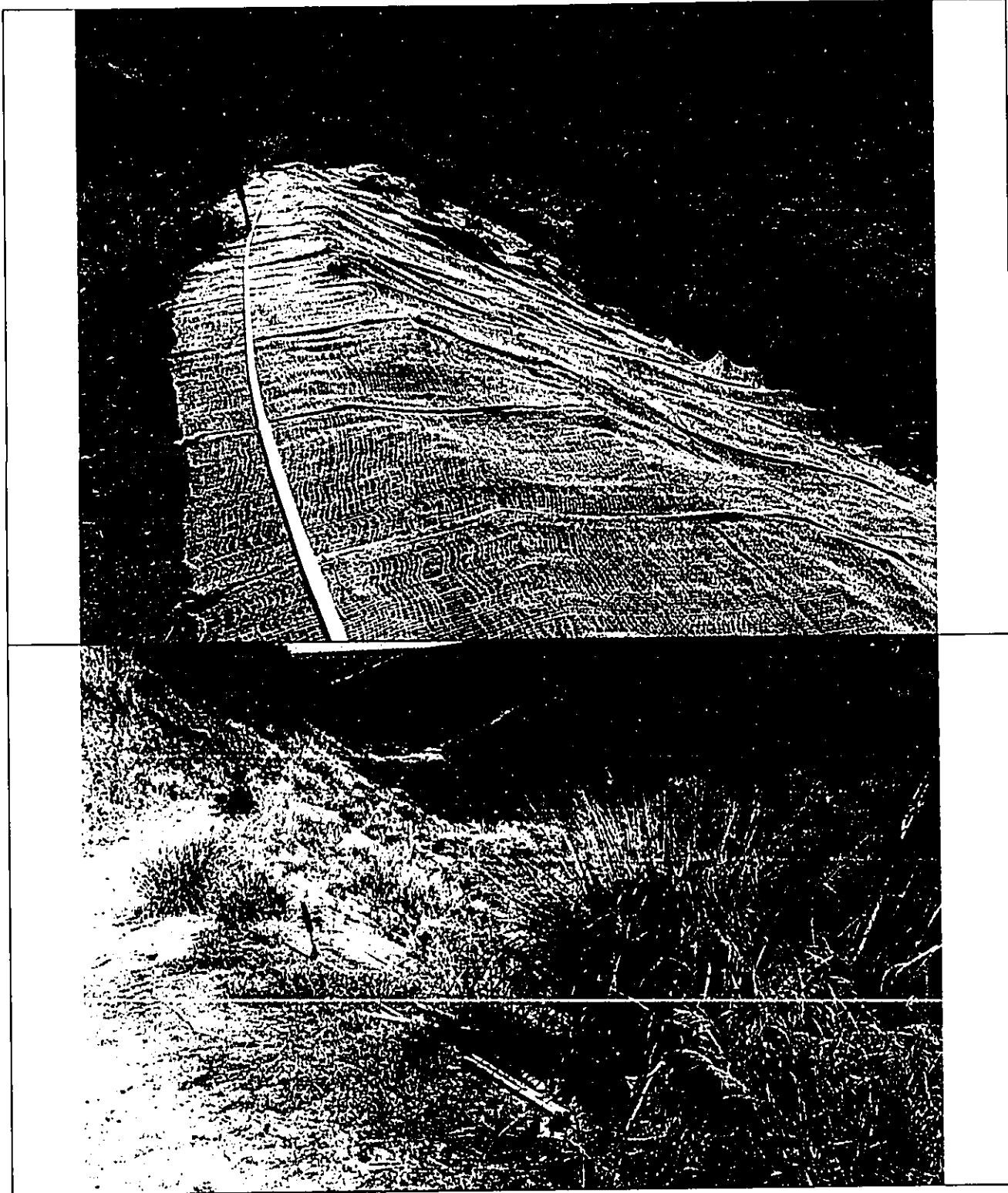
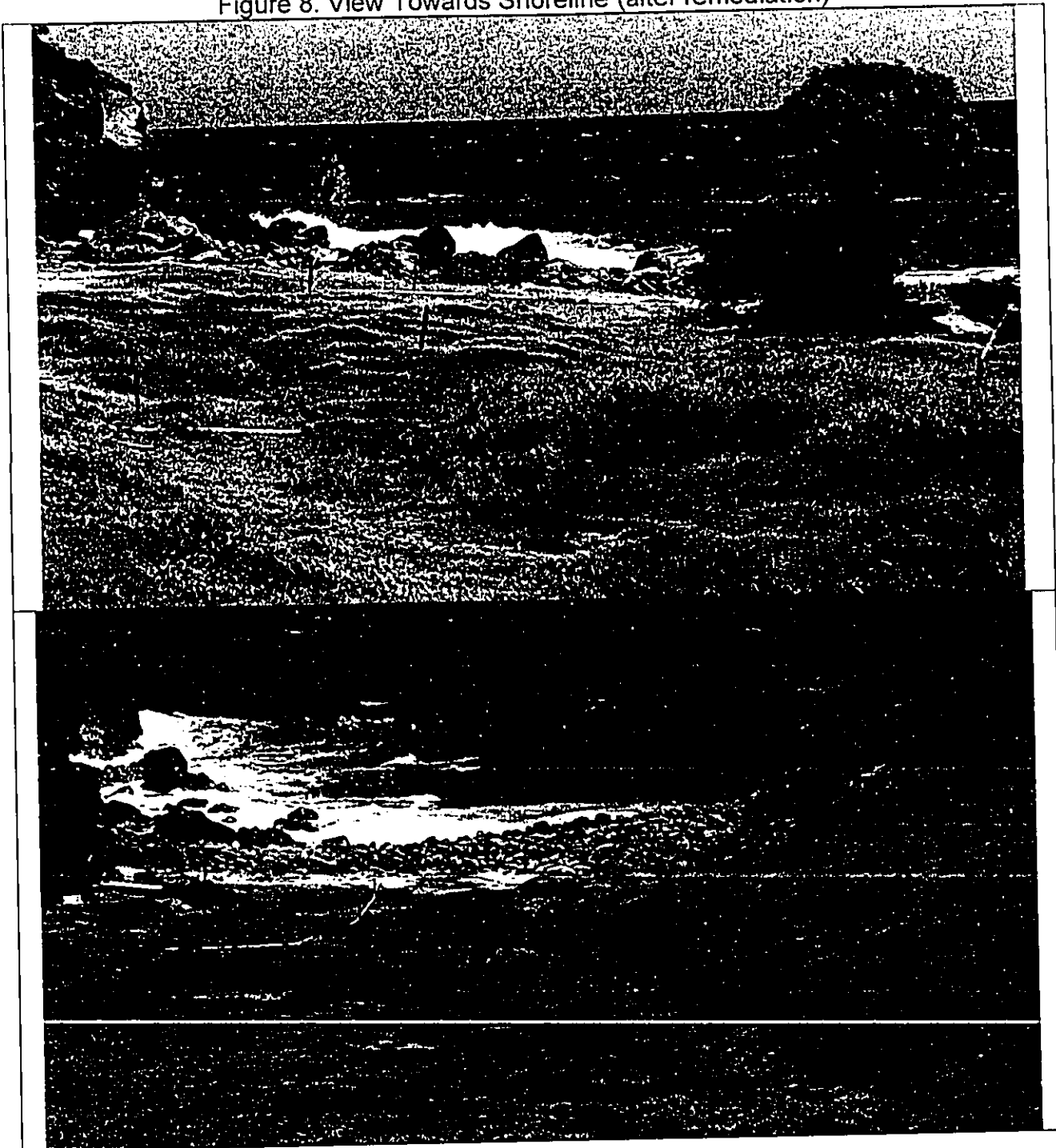


Figure 8. View Towards Shoreline (after remediation)



Potential Impacts and Proposed Mitigation

The project is not expected to impact existing water resources. During construction silt fences were installed to minimize soil erosion. The silt fences in the gulch have since been removed.

2.6 PUBLIC FACILITIES AND SERVICES

The project area is served with municipal water service. Within the area of the proposed action, however, there are no public services. A temporary plastic water line was installed from the lands outside of the gulch to irrigate the newly planted grass.

Potential Impacts and Proposed Mitigation

No impacts are anticipated and no mitigation proposed.

2.7 VEGETATION

The vegetation in the gulch is predominately introduced, non-native plants. No native plant species were observed during a site visit. Ironwood is the predominate tree in the gulch. Ground cover is an assortment of introduced grasses. The vegetation on the project site can be generally attributed to the grazing of cattle by the previous owner. Former use of the lands above the gulch was sugarcane. The proposed use will not change the existing plant cover.

Potential Impacts and Proposed Mitigation

All expose soil areas along the road were stabilized with geotextile fabric and planted with grass. During the initial phases of planting, an irrigation system was installed to facilitate plant growth. There were no impacts to endangered or threatened plant species.

SECTION 3

RELATIONSHIP TO LAND USE POLICIES AND CONTROLS OF THE AFFECTED AREA

3.1 OVERVIEW

State and County policy, land use plans and controls are established to guide development in a manner that enhances the overall living environment of Hawai'i, and that ensures the long-term social, economic, environmental, and land use needs of Hawai'i are met. The use of the site for single family residential development is in accordance with State and County land use plans and policies, as discussed below.

3.2 HAWAII STATE PLAN AND FUNCTIONAL PLANS

The Hawai'i State Plan, adopted in 1978, consist of three parts:

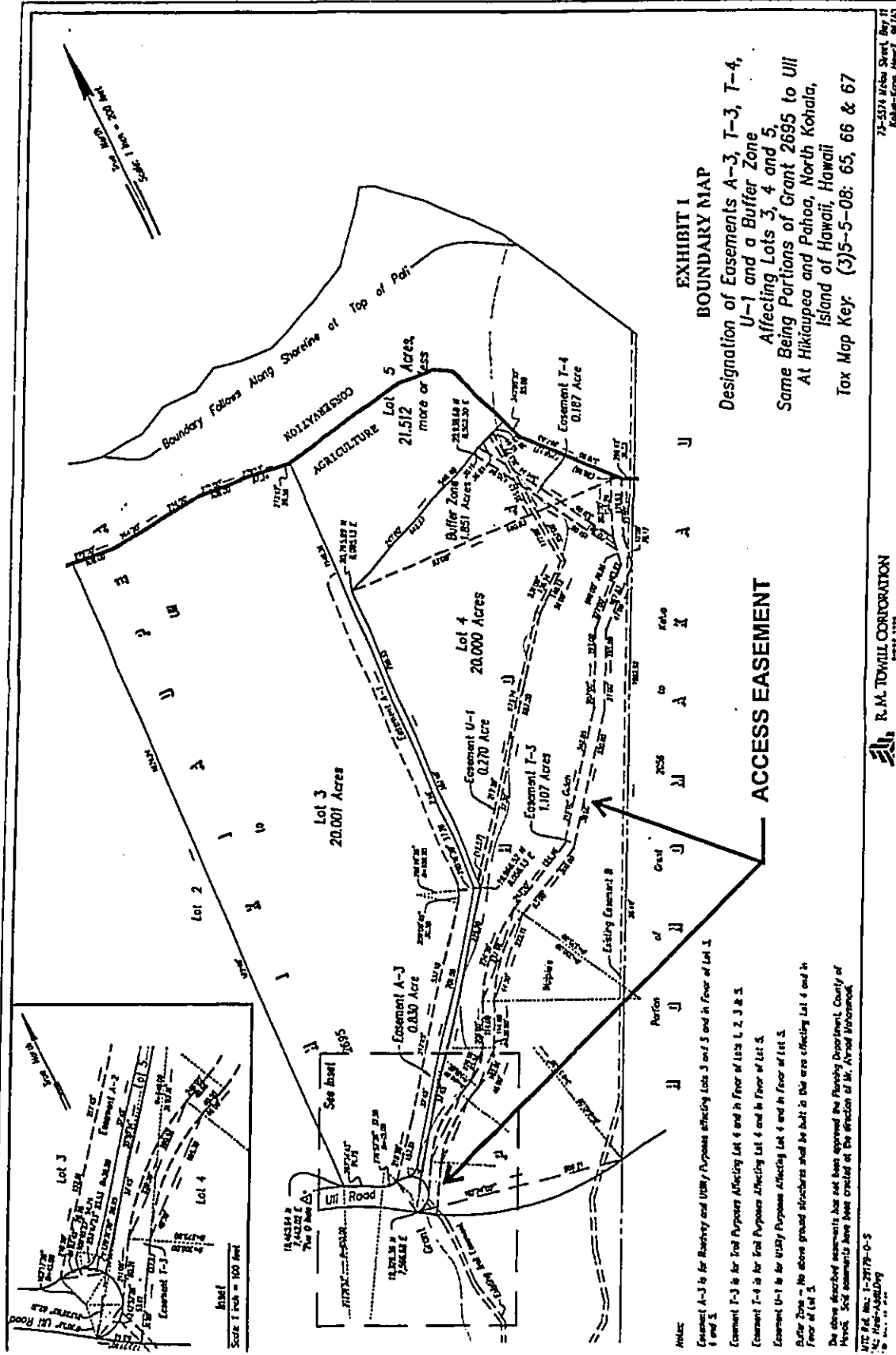
1. An overall theme with broad goals, objectives and policies
2. A system designed to coordinate public planning to implement the goals, objectives and policies of the State Plan; and
3. Priority guidelines which are statements of Statewide interrelated problems deserving immediate action.

The State Functional Plans are intended to provide more detail for implementing the State Plan. They guide State and County actions under specific functional topics. Another State Functional Plan that is relevant to this project is the State Conservation Lands Functional Plan, whose objective is:
The objective of the State Conservation Functional Plan is providing for a management program allowing for judicious use of the State's natural resources balanced with the need to protect these resources to varying degrees."

"Judicious use" of Conservation District resources and lands includes the provision for single family residences, as detailed in the Hawai'i Administrative Rules, Chapter 13-5 (Section 6.3 following).

3.3 STATE LAND USE LAW/REGULATION OF THE CONSERVATION DISTRICT

The State Land Use Commission classifies all lands in the State of Hawai'i into one of four land use designations: Urban, Rural, Agricultural and Conservation. A portion of the grading work is in the State Conservation District. **See FIGURE 9, Conservation District Map.** Land uses in the Conservation District are regulated by the State Department of Land and Natural Resources. Hence, the project must conform to



**FIGURE 9. SUBDIVISION MAP
SHOWING CONSERVATION-
AGRICULTURE BOUNDARY**

requirements of Hawai'i Administrative Rules, Title 13, Subtitle 1 Administration, Chapter 5, "Conservation District," which regulates all Hawai'i lands within the conservation land use designation. Chapter 13-5 divides the Conservation District into subzones and provides for identified land uses in each subzone. The subject TMK is partially located in the Resource Subzone, in which the proposed use falls under as identified land use "P-1 (D-1) Demolition, grading and removal or alteration of topographic features [Chapter 13-5]." The portion closest to the ocean is in the Resource Subzone (approximately 400 feet inland).

3.4 COUNTY OF HAWAII GENERAL PLAN

The current edition of the County of Hawai'i General Plan was adopted in 2005. The Plan is a comprehensive statement of objectives and policies for Hawai'i's future development. It presents the basic growth policy for Hawai'i which calls for limited development of the area in order to sustain their low density or rural characteristics.

The General Plan and Land Use map designates the project area as Important Agricultural Lands. This designation applies to the lands above the gulch which was formerly used for pasture. The land in gulch is mostly cliffs and rock outcrops. The bottom of the gulch is mostly eroded soil mixed with boulders.

3.5 COUNTY ZONING

The project area is zoned Agriculture-20 acres (A-20a).

3.6 SPECIAL MANAGEMENT AREA

The proposed action is within the Special Management Area as defined by the County of Hawai'i. The following is an evaluation of the proposed action based on the criteria identified in Chapter 205A, Hawai'i Revised Statutes:

- a. *Recreational resources:*
 - (A) *Provide coastal recreational opportunities accessible to the public.*

The proposed pathway is being constructed to provide an access to the ocean for the public. An access easement that was previously constructed has been removed thus precluding public access. This new pathway has been constructed to replace the former access easement.

- b. *Historic resources:*
 - (A) *Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.*

No historic properties were identified along the pedestrian access during construction of during remediation work. The Department of Land and Natural Resources, Historic Preservation Division was notified of the work.

- c. *Scenic and Open Space resources:*
 - (A) *Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.*

The area of the proposed improvement cannot be seen from any public thoroughfare or public space. Further, because the work will be within a gulch, most views are over the proposed work area. The area within the gulch is also wooded and thus the view of the access road is mostly obscured.

- d. *Coastal Ecosystems:*
 - (A) *Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.*

The proposed action has the potential of impacting the coastal ecosystem through the release of eroded soil into the ocean. However, mitigative actions were taken to minimize or eliminate this potential. The following actions were taken:

- 1) Immediate planting of all exposed fill areas,
- 2) Stabilizing the fill slopes with jute netting,
- 3) Installation of silt fencing at the toe of the slopes to detail silt, and
- 4) Installation of a silt fencing along the "back beach" (area above the upper reaches of the ocean).

- e. *Economic Uses:*
 - (A) *Provide public or private facilities and improvements important to the State's economy in suitable locations.*

The construction of the pathway did not directly impact the economy of the State or region. Direct economic benefit was to the construction contractor. The State will benefit indirectly via taxes paid.

- f. *Coastal Hazards:*
 - (A) *Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.*

The construction of the pathway did not increase risks to life or property from tsunami, storm waves, stream flooding, erosion, subsidence and/or pollution. Construction impacts, such a erosion potential, were mitigated by planting of cut and fill areas. In addition, the placement of jute matting also aided the stabilization of the soil.

- g. *Managing development;*
 - (A) *Improve the development review process, communication, and public participation in the management of coastal resources and hazards.*

The proposed pathway will not of itself promote the management of development within the special management area. The review process, however, will afford other public agencies and the public to review the proposed action.

- h. Public participation:*
 - (A) Stimulate public awareness, education, and participation in coastal management.*

Through the review of the proposed action the public, organizations and agencies will have the opportunity to discuss the merits of the proposed action.

- i. Beach protection:*
 - (A) Protect beaches for public use and recreation.*

The proposed action will provide public access to the shoreline via an easement created for that purpose. Without the access easement, access to the shoreline at Waipiele Gulch would be limited. There is no sand beach in this location as the shoreline is mostly boulders.

- j. Marine resources:*
 - (A) Promote the protection, use, and development of marine and coastal resources to assure their sustainability.*

The proposed action does not include additional actions beyond the development of the pathway and clearing of debris from the lower reaches of Waipiele Gulch. The cleared areas have been grassed and have been allowed to naturalize. The embankments have been grassed to prevent soil erosion.

SECTION 4 REQUIRED PERMITS

The following permits may be required:

1. County of Hawai'i, Department of Public Works and Building Department, the applicant will need a grading permits.
2. County of Hawai'i, Planning Department, Special Management Area Permit.
3. National Pollutant Discharge Elimination System, Notice of Intent, Form C, Construction Stormwater Discharge
4. Section 401, Clean Water Act, Permit
5. Section 404, Clean Water Act, Permit

SECTION 5 DETERMINATION

5.1 DETERMINATION SUMMARY

Based on significance criteria set forth in Hawai'i Administrative Rules, Title 11, Department of Health, Chapter 200, "Environmental Impact Statement Rules," the proposed project is not expected to have a significant impact on the environment. The recommended preliminary determination for the proposed project is a Finding of No Significant Impact (FONSI). The findings and reasons supporting this determination are discussed below.

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

The project did not result in a loss of natural or cultural resources. The pathway minimally disturbed existing vegetation in the area. The majority of the site will remain in its natural state.

No archaeological sites or cultural features were encountered on the subject property during construction activities.

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

Presently, the area disturbed on the subject property is vacant. The pathway is a permitted land use in the Agriculture zoned district. The pathway does not curtail beneficial uses of the environment.

3. *Conflicts with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 343, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders*

The pathway has been planned and designed in conformance with the environmental policies and guidelines established in Chapter 343, HRS. The subject property is not under an Executive Order.

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

The construction of the pathway is minor in scope and will not impact the economy or social welfare of the community or state.

5. *Substantially affects public health*

Factors affecting public health, including air quality, water quality, and noise levels, were minimal and impacts were limited to the construction period. Short-term impacts were limited to construction activities. No long term impacts are anticipated. Once the pathway was installed, the public benefited by a safe means of accessing the shoreline.

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

The pathway construction, site clearing and landscaping did not have any impact on population nor where there effects on public facilities and services.

7. *Involves a substantial degradation of environmental quality*

Impacts to air and water quality, noise levels, natural resources, and land use associated with the construction were minimal and short-term. Mitigation measures were employed as practicable to further minimize potentially detrimental effects to the environment resulting from project activities. The project did not involve substantial degradation of environmental quality.

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

The project is not part of a larger action and adverse cumulative impacts on the environment are not anticipated, nor does the project involve a commitment for larger actions on the subject property.

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

There are no threatened or endangered plant or animal species on the subject property.

10. *Detrimentially affects air or water quality or ambient noise levels*

On a short-term basis, ambient air and noise conditions was affected by construction activities related to the project actions, but these impacts were controlled by measures described in this Environmental Assessment. Once the project was completed, air and noise conditions in the project vicinity returned to their present levels.

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

The pathway is located away from coastal waters. The area is not particularly prone to erosion or landslides. The project is not located in an environmentally sensitive area

and is unlikely to affect or suffer damage from natural forces such as flooding, or earthquakes.

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

The constructed pathway and cleared areas did not impact scenic view planes or scenic vistas. The improvements cannot be viewed from a public roadway or public space.

13. Requires substantial energy consumption

Construction activities associated with the proposed pathway construction of land clearing did not require substantial amounts of energy. Fuel was expended during the construction activities.

5.2 FINDINGS

In accordance with the provisions set forth in Chapter 343, Hawai'i Revised Statutes, and the significance criteria in Section 11-200-12 of Title 11, Chapter 200, it is anticipated that the project will have no significant adverse impact to water quality, air quality, existing utilities, noise levels, social welfare, archaeological sites, or wildlife habitat. All anticipated impacts were temporary and did not adversely impact the environmental quality of the area. It is expected that an Environmental Impact Statement (EIS) will not be required, and that a Finding of No Significant Impact (FONSI) will be issued for this project.

SECTION 6

AGENCIES AND ORGANIZATIONS CONSULTED

Organizations and persons commenting on the Draft EA are identified below with an asterisk (*). Comment received follow.

6.1 STATE OF HAWAII

Department of Land and Natural Resources
Office of Conservation and Coastal Lands
Historic Preservation Division
Department of

6.2 COUNTY OF HAWAII

Planning Department
Department of Public Works

6.3 INDIVIDUALS AND ORGANIZATIONS

Ka'amakani 'O Kohala Ohana (Mr. Grandoni)
Ms. Pat Tummons

6.4 FEDERAL AGENCIES

Army Corps of Engineers

APPENDIX

AFFADAVITS OF LOCAL RESIDENTS

LINDA LINGLE
GOVERNOR OF HAWAII



GENEVIEVE SALMONSON
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186
E-mail: oeqc@health.state.hi.us

February 15, 2007

Mr. Christopher Yuen, Director
Planning Department, County of Hawaii
101 Pauahi Street, Suite 3
Hilo, Hawaii 96720


Dear Mr. Yuen:

Subject: Draft EA for Waipiele Gulch Pedestrian Path

Thank you for the opportunity to review the environmental assessment. We do not have any comments.

If you have any questions please call Jeyan Thirugnanam at 586-4185.

Sincerely,


Genevieve Salmonson
Director

c: RM Towill
Ecommerce Enterprises

Harry Kim
Mayor



County of Hawaii
PLANNING DEPARTMENT
101 Puuahi Street, Suite 3 • Hilo, Hawaii 96720-3043
(808) 961-8288 • FAX (808) 961-8742

Christopher J. Yuen
Director
Brad Kurokawa, ASLA
LEED® AP
Deputy Director

July 17, 2006

Chester Koga, AICP
R.M. Towill Corporation
420 Waiakamilo Road, Suite 420
Honolulu, HI 96817

Mr. and Mrs. Ahmed Mohammadi
P.O. Box 219
Hawi, Hawaii 96719

Dear Mr. Koga and Mr. & Mrs. Mohammadi:

Comments Re: Draft Environmental Assessment (DEA) & Anticipated Finding of No Significant Impact (FONSI):
Request: Pedestrian Path, Site Clearing and Landscaping – After-the-Fact Special Management Area Use Permit (SMA) For Ahmed and Rachael Mohammadi
Pahoa, North Kohala, Hawaii Island
TMK: 5-5-008: 066 & 067

Determination: This is to acknowledge receipt of the Draft Environmental Assessment (DEA) received on July 8, 2006. Having been identified as the accepting authority, we have reviewed the above DEA-FONSI for the after-the-fact pedestrian access for Ahmed and Rachael Mohammadi. Given the scope of the project, in general, the DEA is deemed adequate and accepted.

The draft, however, did not provide adequate information on the matters identified below. Please acknowledge to this office that the information required on the items discussed below will be addressed and incorporated in the final EA.

Appendix A: Affidavits of Area Residents: This was not included along with the DEA. Please include with the Final EA.

List of Figures: Under Table of Contents, the "List of Figures" does not coincide with the figures within the report. Please revise.

Chester Koga, AICP
R.M. Towill Corporation
Mr. and Mrs. Ahmed Mohammadi
July 17, 2006
Page 2

General Plan Land Use Designation: Under Summary of Proposed Action on Page 1, the General Plan LUPAG Map designation for the proposed request is Important Agricultural Lands. This information needs to be added to Section 3.4 County of Hawaii General Plan on Page 16, as well. Please revise.

Present County Zoning: Under Summary of Proposed Action on Page 1, the County zoning is Agricultural 20-acre (A-20a), not Conservation. This information needs to be corrected to Section 3. County Zoning on Page 16, as well. Please revise.

1.3 Proposed Action: The DEA maintains that the work done by the applicant was a "re-constructed" graded roadway and/or a pathway that was graded along "a former plantation roadway used for the maintenance of the railway used by the sugarcane plantation. Additionally, the DEA maintains that the owner (applicant) constructed the road in the belief that he was complying with the requirements of the subdivision approval, which required the provision of a pathway from the subdivision to the shoreline.

Without the submittal of physical evidence, such as photos or maps, along with the submitted affidavits, the Planning Department disagrees with your representations and feels that the actual activity that has occurred was a graded "roadway" that did not follow any former plantation road, neither did it follow the public pedestrian access within the approved subdivision. We do not agree with this aspect of the project description but given that you have submitted some supporting evidence we will not reject it on that basis.

Additionally, under 1.3, references are made to a subdivision map that shows an access easement (Figure 3 and Figure 8) and a Grading Plan (Figure 4) that appears to reference the area that was graded without permits. Please revise submittals to include information that these are not approved maps and plans. It appears by the grading plan (Figure 4b) that a portion the proposed pathway may be located on the adjacent parcel (TMK: 5-4-8: 36). Please revise grading plan and/or submit information in reference to this matter.

2.4 Existing Land Use: Under 2.4 Existing Land Use on Page 10 (and other areas in the DEA), you reference "the property" and "subject parcel" for the project. Additionally, you state that the property is devoid of structures. The project consists of two properties or parcels, with parcel 67 having a large dwelling that has been constructed. Please revise.

3.6 Special Management Area: Under 3.6 Special Management Area on Page 18 and 19, you discuss several objectives for the Coastal Zone Management Program, as listed under Section 205A-2 of the Hawaii Revised Statutes, as amended, but you did not

Chester Koga, AICP
R.M. Towill Corporation
Mr. and Mrs. Ahmed Mohammadi
July 17, 2006
Page 3

discuss (7) Managing development, (8) Public participation, (9) Beach protection and (10) Marine resources. Please revise to include these objectives and policies.

Section 6 Agencies and Organizations Consulted: In the Final EA, please submit any documentation from these agencies that were consulted, including but not limited to letters, e-mails, etc. Please reflect implementation measures that may be required to comply with the laws, rules and regulations of these affected agencies.

Submission Details: The following items will need to be submitted to the Planning Department to complete this review:

4 hard copies of the Draft EA (We will utilize 4 copies that have been submitted)
A Completed OEQC Publication Form
A Project Summary (250 words or less on hard copy and on disk)

Please complete and submit the "OEQC Publication Form" which is to also include a 250-word or less project description. The form can be found at <http://www.state.hi.us/health/oeqc/submissions/index.html>. We are enclosing a copy of the form for your reference. Additionally, you will need submit the summary on a disk or by email to oeqc@pixi.com, and hard copy.

If you have any questions, please feel free to contact Jeff Darrow at 961-8288, ext 259.

Sincerely,


CHRISTOPHER J. YUEN
Planning Director

JWD:smm

P:\WPWIN60\CH343\2006\LEDEA-Mohammadi.doc

cc: West Hawaii Planning Office
Sam Lemmo, State DLNR - Office of Conservation & Coastal Management
Kiran Emler - Department of Public Works-Engineering Division-Kona
Aaron Ueno - Department of Health
OEQC

APPENDIX
AFFADAVITS OF LOCAL RESIDENTS

STATEMENT OF NORTH KOHALA RESIDENT

1. I have been a long-time resident of the District of North Kohala and am familiar with the lands surrounding Pahoia Beach at North Kohala, Hawaii.
2. The graded pathway that follows the southern side of the gulch to Pahoia Beach was originally graded by Kohala Sugar Company.
3. Residents of North Kohala have often utilized this pathway to traverse the gulch for pig hunting and for shoreline fishing at Pahoia Beach.

Dated, 12-13.05, 2005.

James M. Kawant

STATEMENT OF NORTH KOHALA RESIDENT

1. I have been a long-time resident of the District of North Kohala and am familiar with the lands surrounding Pahoia Beach at North Kohala, Hawaii.
2. The graded pathway that follows the southern side of the gulch to Pahoia Beach was originally graded by Kohala Sugar Company.
3. Residents of North Kohala have often utilized this pathway to traverse the gulch for pig hunting and for shoreline fishing at Pahoia Beach.

Dated, 12-13-05, 2005.

Masika Kawakawa

