DRAFT ENVIRONMENTAL ASSESSMENT

EASTER SEALS HAWAIʻI
HILO SERVICE CENTER ADDITION

TMK (3rd) 2-3-015:056
Hilo, Hawaiʻi Island, State of Hawaiʻi

August 2010

County of Hawaiʻi
Office of Housing and Community Development

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APPLICANT:

John Howell, President & CEO
Easter Seals Hawaiʻi
710 Green Street
Honolulu, Hawaiʻi 96813

APPROVING AGENCY:

County of Hawaiʻi
Office of Housing and Community Development
50 Wailuku Drive
Hilo, Hawaiʻi 96720-2456

CONSULTANT:

Geometrician Associates LLC
PO Box 396
Hilo, Hawaiʻi 96721

CLASS OF ACTION:

Use of State Land

This document is prepared pursuant to:

The Hawaiʻi Environmental Protection Act,
Chapter 343, Hawaiʻi Revised Statutes (HRS) and
Title 11, Chapter 200, Hawaiʻi Department of Health Administrative Rules (HAR).

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SUMMARY

Easter Seals Hawai‘i plans to expand and improve its facility in Hilo, which is situated on a 1.0-acre property leased from the State of Hawai‘i on Ka‘iulani Street. The project will add 1,500 square feet of new interior space and two new parking stalls and also involves minor interior renovation and roof replacement at the existing building. No substantial new services are involved, but rather an expansion of existing services. Surveys and consultation have determined that no significant cultural or biological resources are present. Archaeological monitoring will be conducted during initial ground disturbance to ensure that impacts to potential subsurface resources are avoided. The project will not disturb or remove the vegetation higher than 15 feet during critical pupping months for the Hawaiian hoary bat, between May 15 and August 15 of each year. Utilities are adequate for the site, and traffic flow will not be significantly affected.

PART 1: PROJECT DESCRIPTION, PURPOSE AND NEED AND ENVIRONMENTAL ASSESSMENT PROCESS

1.1 Project Description and Location

Easter Seals Hawai‘i plans to expand and improve its facility in Hilo, which is situated on a 1.0-acre property leased from the State of Hawai‘i on Ka‘iulani Street. The project will add 1,500 square feet of new interior space to include two classrooms, bathrooms and a storage area. A covered play area will also be added. The project features two new parking stalls, including an additional handicap-accessible parking stall. The project will also involve minor interior renovation and roof replacement at the existing building. Some landscaping will be included.

1.2 Purpose and Need and Background

Easter Seals Hawai‘i provides exceptional services to ensure that all people with disabilities or special needs and their families have equal opportunities to live, learn, work and play in their communities. The organization has been serving special needs children, youth and adults for 64 years, providing more than 450,000 hours of direct service annually to individuals and families across the State.

The downturn in the national economy has produced severe budget cuts, to which the organization has responded by returning to a focus on delivering services at its service centers. Easter Seals Hawai‘i now helps about three times as many children as in the year 2000. With more children coming to the Easter Seals Hawai‘i-Hilo Service Center, there is increasing need to provide room for group activities and therapy as well as program space for youth services.

Early intervention services such as those provided by the Easter Seals Hawai‘i-Hilo Service Center are designed to help infants and toddlers work toward developmental goals at the time in their lives when they are most ready to learn and can benefit most from intervention. They provide a family-centered, culturally sensitive, coordinated, and comprehensive program to families with children from birth to age three who are experiencing or are at risk for developmental delays in order to optimize development and achieve the highest possible level of functioning.

Infants, children, adults and seniors with developmental disabilities or special needs find the highest quality services designed to meet their individual needs at Easter Seals Hawai’i development centers. Therapists, teachers, care coordinators, social workers, direct support workers, and other health and human service professionals provide opportunities to help each person overcome challenges to independence and reach his or her personal goals.

The Easter Seals Child Development Center Network is the largest provider of inclusive child care in the United States. With nearly 80 centers, Easter Seals serves 7,000 young children and their families, in a setting where children with disabilities or special needs comprise 25 percent of enrollment. Easter Seals Child Development Center Network assures that quality child care will be

Figure 1. Project Location Map/Airphoto

Figure 2. TMK Map

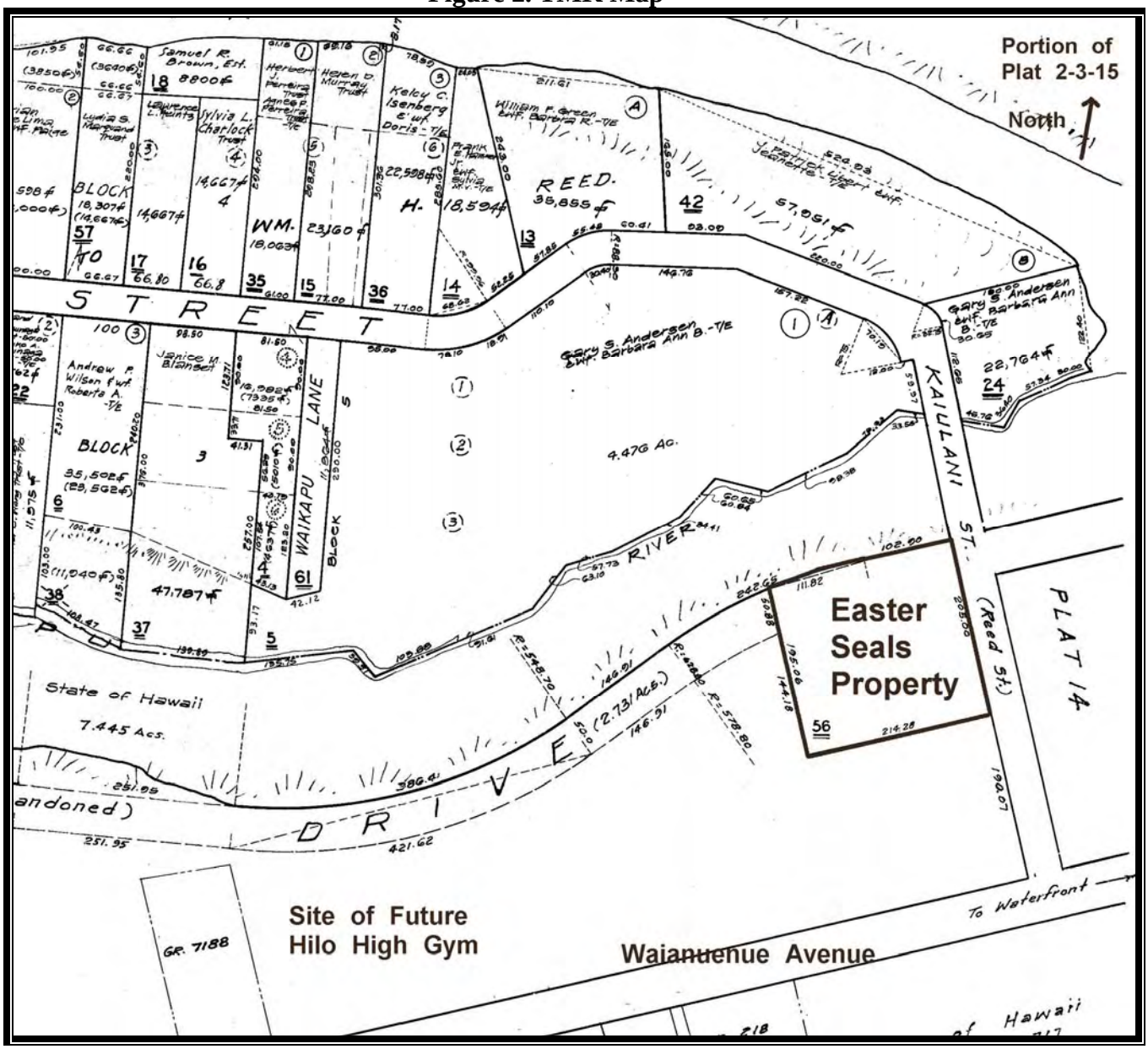

Figure 3. Site Plan

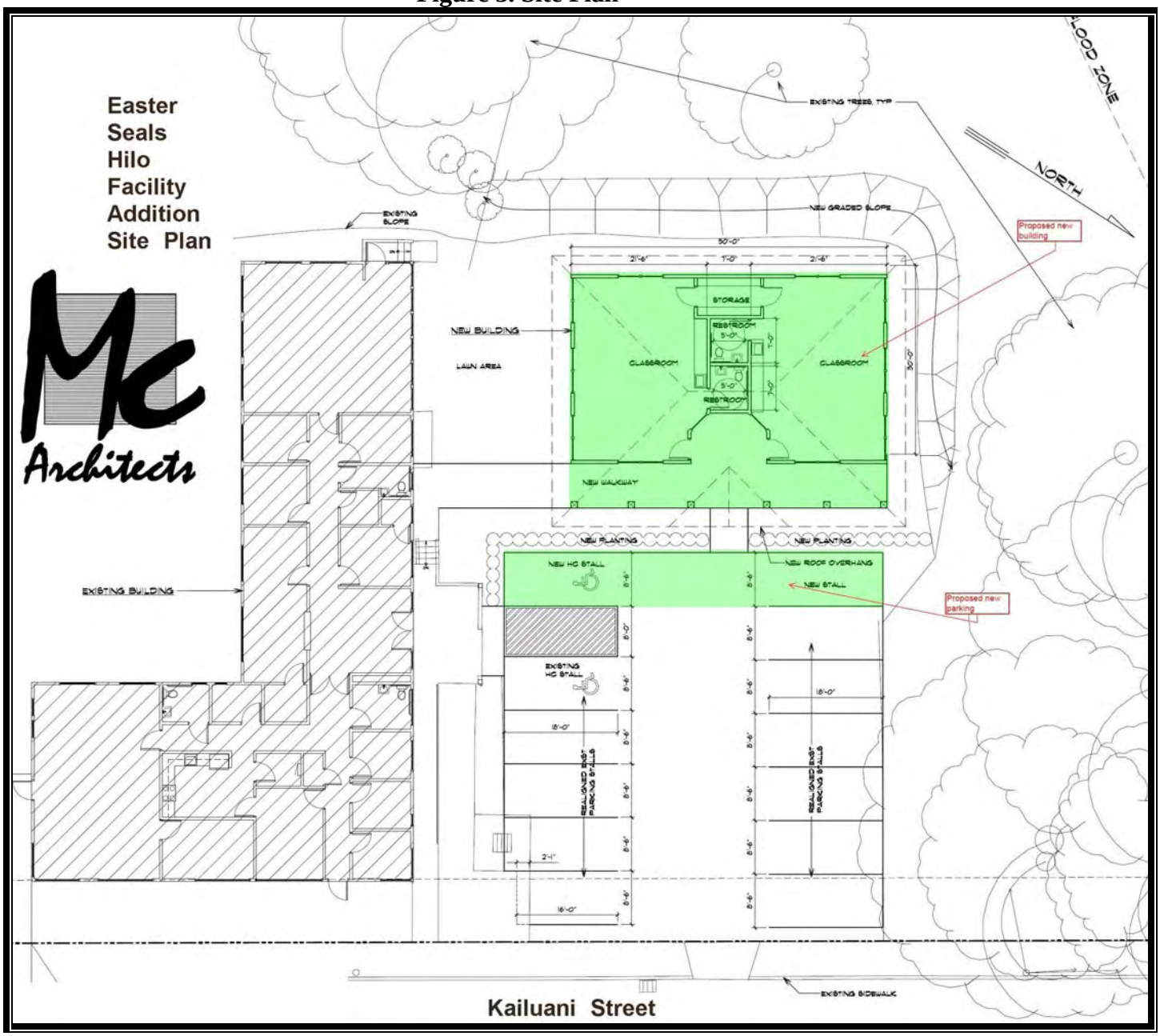

Figure 4. Project Site Photos

Existing Facility ▲ ▼Area of Future Facility (Existing Facility in Background)

available to all children and their parents. There are Easter Seals Child Development Centers in communities across the nation to help children of all abilities work toward developmental goals at the time in their lives when they are most ready to learn. Each of the centers strive to meet the highest level of state and national quality standards. Each Easter Seals facility offers ongoing training for staff, low adult-to-child ratios, developmentally appropriate learning activities, and top-quality facilities that meet or exceed industry standards. As a non-profit organization, Easter Seals Hawai‘i provides high-quality services that are generally free to families in need.

1.3 Environmental Assessment Process

This Environmental Assessment (EA) process is being conducted in accordance with Chapter 343 of the Hawai‘i Revised Statutes (HRS). This law, along with its implementing regulations, Title 11, Chapter 200, of the Hawai‘i Administrative Rules (HAR), is the basis for the environmental impact process in the State of Hawai‘i. According to Chapter 343, an EA is prepared to determine impacts associated with an action, to develop mitigation measures for adverse impacts, and to determine whether any of the impacts are significant according to thirteen specific criteria. Part 4 of this document states the anticipated finding that no significant impacts are expected to occur; Part 5 lists each criterion and presents the findings for each made by the County of Hawai‘i, Office of Housing and Community Development (OHCD), the approving agency.

Separately, environmental documentation in conformance with the National Environmental Policy Act (NEPA) and the implementing regulations of the U.S. Department of Housing and Urban Development (HUD) for NEPA, at 24 CFR Part 58 (see Appendix 2 for copy), is also being undertaken, as the project is being partially funded by a Community Development Block Grant under HUD.

1.4 Public Involvement and Agency Coordination

The following agencies and organizations were consulted in development of this document.

Federal:

- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers

State:

- Department of Education
- Office of Hawaiian Affairs, Honolulu and East Hawai‘i Offices
- Department of Health
- Department of Land and Natural Resources, State Historic Preservation Division

County:

- Planning Department
- Department of Public Works
- Department of Water Supply
- County Council

Private:

- Hilo Downtown Improvement Association
- Hilo United Methodist Church
- Hawai‘i Island Chamber of Commerce
- Morito Yamamoto Trust
- Karen A. Moriuchi
- Sierra Club

Copies of communications received during early consultation are contained in Appendix 1a.

PART 2: ALTERNATIVES

2.1 No Action

Under the No Action Alternative, the additional facilities would not be constructed, and the expansion of services provided by the Easter Seals Hawai‘i-Hilo Service Center would not occur. Because of the need for such opportunities in this area, the project proponents and Easter Seals Hawai‘i consider the No Action Alternative highly undesirable.

2.2 Alternative Locations

Because the Easter Seals Hawai‘i-Hilo Service Center already exists on Ka‘iulani Street, and there is sufficient room on the one-acre lot for the expanded facilities, very few alternative properties are available for consideration. As Easter Seals Hawai‘i is a non-profit entity, there is also a requirement for free or minimally priced land, which further limits available alternative properties. Though such sites might be theoretically feasible, there is a long history of focus on this particular site, which has led to a deep community commitment and investment.

PART 3: ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

The area of the State property upon which the Easter Seals Hawai‘i-Hilo Service Center would be expanded is referred to in this EA as the *project site*. The term *project area* is used to describe the general environs of this part of Hilo.

Physical Environment

3.1.1 Climate, Geology, Soils and Geologic Hazards

Environmental Setting

The project site is located at about 85 feet in elevation at 49 Ka‘iulani Street, near the intersection of Ka‘iulani Street and Wailuku Drive, just northeast of Waianuenue Avenue in Hilo (see Figs. 1-3). The climate is warm and moist. The average rainfall is approximately 135 inches (U.H. Hilo-Geography 1998:57).

The surface of the project area is deeply weathered volcanic ash, likely deposited during the Pleistocene Epoch, which is interlayered with Ka‘u basalt lava from Mauna Loa Volcano dated from between 10,000 to 31,000 years before the present (Wolfe and Morris 1996). The project area soil is classified by the U.S. Natural Resources Conservation Service (formerly Soil Conservation Service) as Hilo silty clay loam, which is a well-drained, deep soil formed from volcanic ash and typically found on 0 to 10 percent slopes (U.S. Soil Conservation Service 1973). The project site is located adjacent to Wailuku River, which is surrounded by Rough Broken Land (RB) which is made up of silty clay loam and of which gulches are typically comprised. The project site contains both types.

The entire Big Island is subject to geologic hazards, especially lava flows and earthquakes. Volcanic hazard as assessed by the U.S. Geological Survey in this area of Hilo is zone 3, on a scale of ascending risk from 9 to 1 (Heliker 1990:23). The high hazard risk is based on the fact Mauna Loa is presently an active volcano. Volcanic hazard zone 3 areas have had up to 5 percent of their land area covered by lava or ash flows since the year 1800, but are at lower risk than zone 2 areas because of their greater distances from recently active vents and/or because the local topography makes it less likely that flows will cover these areas.

In terms of seismic risk, the entire Island of Hawai‘i is rated Zone 4 Seismic Hazard (*Uniform Building Code, 1997 Edition*, Figure 16-2). Zone 4 areas are at risk from major earthquake damage, especially to structures that are poorly designed or built. On October 15, 2006, two damaging earthquakes of magnitude 6.7 and 6.0 struck the west side of Hawai‘i Island. These earthquakes caused no damage to the project site.

Impacts and Mitigation Measures

The project site is susceptible to lava flow and seismic hazard. However, as much of the island has similar hazard levels, geologic hazards impose no particular constraints on the proposed action, and the proposed facilities are not imprudent to construct. Project design will take soil properties into account. All facilities will be built in conformance with the Uniform Building Code's seismic standards.

3.1.2 Drainage, Water Features and Water Quality

Existing Environment

The project site has no perennial surface water bodies and no known areas of local (non-stream related) flooding. According to the Federal Emergency Management Agency's Flood Insurance Rate Map (FIRM) 1551660880C (9/16/1988), the project site is in Flood Zone X, outside the 500-year floodplain. A portion of the property (shown in Figure 3) is within the flood zone, but that area is well outside the zone of disturbance or use for the proposed project. A large area of coastal Hilo has been struck by several highly destructive tsunami in historic times. The May 23, 1960 tsunami had a runup of 35 feet at Hilo Bay, killing 61 people and destroying about 540 homes and businesses while the April 1, 1946 tsunami had a runup at Hilo Bay of 25 feet (*Atlas of Hawai'i*, 3rd edition). Maps printed by the Pacific Tsunami Warning Center and the Hawai'i County Civil Defense Agency locate the parcel about 1,000 feet outside the area that should be evacuated during a tsunami warning (http://www.co.hawaii.hi.us/cd/tsunami/Map1.pdf).

Impacts and Mitigation Measure

Because of the limited scale of construction and the environmental setting, the risks for flooding or impacts to water quality are negligible. Although there is a stream that is tributary to the Wailuku River not far north of the property, no streams, ponds, wetlands, or any other waters of the U.S. would be affected. An existing drywell at the facility is adequate to accommodate the minimal extra storm water of the proposed addition.

In order to minimize the potential for sedimentation and erosion, the contractor shall perform all earthwork and grading in conformance with Chapter 10, Erosion and Sediment Control, Hawai'i County Code. The contractor will implement appropriate best management practices (BMPs) for the project. These BMPs may include, but will not be limited to, the following:

- Minimization of soil loss and erosion by revegetation and stabilization of slopes and disturbed areas of soil, possibly using hydromulch, geotextiles, or binding substances, as soon as possible after working;
- Minimization of sediment loss by emplacement of structural controls possibly including silt fences, gravel bags, sediment ponds, check dams, and other barriers in order to retard and prevent the loss of sediment from the site;
- Minimizing disturbance of soil during periods of heavy rain;

- Phasing of the project to disturb the minimum area of soil at a particular time;
- Application of protective covers to soil and material stockpiles;
- Washing of vehicles in the designated wash area before they egress the project site;
- Use of drip pans beneath vehicles not in use in order to trap vehicle fluids;
- Routine maintenance of BMPs by adequately trained personnel;
- Coordination of storm water BMPs and wind erosion BMPs whenever possible; and
- Cleanup and disposal at an approved site of significant leaks or spills, if they occur.

Because the total disturbed area is well under the threshold of one acre, neither a County grading permit nor a National Pollutant Discharge Elimination System (NPDES) permit from the State Department of Health is required.

3.1.3 Flora, Fauna and Ecosystems

Existing Environment

The natural vegetation of this part of Hilo was most likely lowland rain forest dominated by *ʻōhiʻa* (*Metrosideros polymorpha*) and *hala* (*Pandanus tectorius)* (Gagne and Cuddihy 1990). The project area has been completely transformed by clearing associated with agriculture and urban uses as well as the introduction of non-native species. Very few native species remain in the project area.

The project site itself, which totals only about 5,400 square feet, appears to have been largely disturbed in the past through construction of the parking lot and other grading. This area has been landscaped with palms, various small trees, crotons, bananas, and ginger. Managed periodically through herbicide and chopping, when untended it becomes covered with low plants such as pothos vine (*Epipremnum pinnatum*), firespike (*Odontostema cuspidatum*), and seedlings of various non-native trees.

Most animals found on the project site are non-native, including a variety of birds, rodents and invertebrates as well as dogs, cats, and mongooses. Some wide-ranging terrestrial vertebrates listed under the Endangered Species Act may be present in this part of Hilo and may overfly, roost, nest, or utilize resources here. These include the endangered Hawaiian Hawk (*Buteo solitarius*), the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), the endangered Hawaiian Petrel (*Pterodroma sandwichensis*), and the threatened Newell's Shearwater (*Puffinus auricularis newelli*). Unshielded outdoor lighting may disorient seabirds and lead to injury or death; no major lighting is planned and all outdoor lighting will be shielded in conformance with the Hawaiʻi County Outdoor Lighting Ordinance. Removal of large trees between March and September in any area of the island of Hawaiʻi runs a small risk of disturbing Hawaiian Hawk nests; no removal of large trees will be necessary.

There is also some chance that Hawaiian hoary bats may roost within some of the tall shrubs and low (10-20 foot tall) trees that will be removed or trimmed. Easter Seals Hawaiʻi will refrain from activities that disturb or remove vegetation taller than 15 feet during critical pupping months for the Hawaiian hoary bat, between May 15 and August 15 of each year.

Although there is a stream that is tributary to the Wailuku River not far north of the property, no streams, ponds, wetlands, native forest groves or other important habitat areas would be affected.

Table 1
Plant Species Detected On/Near Project Site

Scientific Name	Family	Common Name	Life Form	Status*
DICOTS				
Justicia betonica	Acanthaceae	Shrimp Plant	Shrub	A
Odontostema cuspidatum	Acanthaceae	Firespike	Shrub	A
Mangifera indica	Anacardiaceae	Mango	Tree	A
Ageratum conyzoides	Asteraceae	Ageratum	Herb	A
Crassocephalum crepidioides	Asteraceae	Crassocephalum	Herb	A
Chamaesyce hirta	Euphorbiaceae	Spurge	Herb	A
Codiaeum variegatum	Euphorbiaceae	Croton	Shrub	A
Falcataria moluccana	Fabaceae	Albizia	Tree	A
Desmodium incanum	Fabaceae	Spanish Clover	Herb	A
Persea americana	Lauraceae	Avocado	Tree	A
Psidium guajava	Myrtaceae	Guava	Tree	A
Syzygium jambos	Myrtaceae	Rose Apple	Tree	A
Paederia scandens	Rubiaceae	Maile Pilau	Vine	A
Chrysophyllum oliviforme	Sapotaceae	Satin Leaf	Tree	A
Clerodendrum chinense	Verbenaceae	Pikake Honohono	Tree	A
MONOCOTS				
Cordyline fruticosa	Agavaceae	Ti	Shrub	A
Epipremnum pinnatum	Araceae	Pothos	Vine	A
Philodendron sp.	Araceae	Philodendron	Shrub/Vine	A
Scindapsus aureus	Araceae	Taro Vine	Vine	A
Archontophoenix alexandrae	Arecaceae	Alexandra	Palm	A
Commelina diffusa	Commelinaceae	Honohono	Herb	A
Dracaena fragrans	Agavaceae	Massangeana	Shrub	A
Dracaena marginata	Agavaceae	Money Tree	Shrub	A
Heliconia spp	Musaceae	Heliconia	Herb	A
Musa sp.	Musaceae	Banana	Shrub	A
Setaria palmifolia	Poaceae	Palmgrass	Herb	A
Etlingera elatior	Zingiberaceae	Torch Ginger	Shrub	A
NON-FLOWERING PLANTS				
Cycas revoluta	Cycadaceae	Sago Palm	Shrub	A

A = alien, E = endemic, I = indigenous, End = Federal and State listed Endangered Species

Impacts and Mitigation Measures

Because of the general lack of native ecosystems, or threatened or endangered plant species, along with the mitigation measure to avoid impacts to Hawaiian hoary bats, no adverse impacts to biological resources would occur as a result of construction and use of the site.

3.1.4 Air Quality, Noise, and Scenic Resources

Environmental Setting

Air pollution in East Hawai‘i is minimal, and is mainly derived from volcanic emissions of sulfur dioxide, which convert into particulate sulfate and produce a volcanic haze (vog) that occasionally blankets the district, particularly during instances of southerly or “kona” wind conditions. The persistent tradewinds keep the project area relatively free of vog for most of the year.

Noise on the project site is moderate and derived mainly from nearby commercial, educational and residential activities as well as motor vehicles, with occasional noise from maintenance activities and the nearby Wailuku River.

The project area does not contain any sites that are considered significant for their scenic character in the Hawai‘i County General Plan.

The general project area, including the project site, is in commercial, educational and residential use and does not exhibit scenic resources or viewplanes considered significant for their scenic character in the Hawai‘i County General Plan.

Impacts and Mitigation Measures

Development would entail limited excavation, grading, compressors, vehicle and equipment engine operation, and construction of new infrastructure. These activities may generate noise exceeding 95 decibels at times, impacting nearby sensitive noise receptors. In cases where construction noise is expected to exceed the Department of Health’s (DOH) “maximum permissible” property-line noise levels, contractors are required to obtain a permit per Title 11, Chapter 46, HAR (Community Noise Control) prior to construction. Prior to construction, the contractor will consult with the DOH, which will review the proposed activity, location, equipment, project purpose, and timetable in order to decide upon conditions and mitigation measures, such as restriction of equipment type, maintenance requirements, restricted hours, and portable noise barriers.

The expanded facility will not produce emissions, and there are no indications of air quality violations that would make the area unacceptable for its proposed use.

No important viewplanes or scenic sites recognized in the Hawai‘i County General Plan would be affected, and the project would involve essentially no scenic impacts.

3.1.5 Hazardous Substances, Toxic Waste and Hazardous Conditions

No professional evaluation such as a Phase I Environmental Site Assessment (ESA) was performed on the project site. Based on onsite inspection, it appears that the project site contains no hazardous or toxic substances and exhibits no other hazardous conditions. If evidence of suspicious materials or conditions appears during excavation or other construction, Easter Seals Hawai‘i may undertake a systematic assessment of the area in question to determine if remediation is required.

3.2 Socioeconomic and Cultural

3.2.1 Socioeconomic Characteristics

The project would affect and benefit the Hilo area and, more generally, East Hawai‘i. Table 2 provides information on the socioeconomic characteristics of Hilo along with those of Hawai‘i County as a whole for comparison, from the United States 2000 Census of Population. Hilo has a diverse population as does Hawai‘i County, which is among the 100 fastest-growing counties in the U.S. Several segments of the population that typically exhibit disadvantaged measures of social welfare are disproportionately represented in the population of Hilo as compared to the County or State of Hawai‘i. Median family income is 10 percent less than that of the County as a whole. More than 15 percent of individuals in the county have income below the poverty level, double the statewide rate. Similar patterns pertain to households receiving welfare, food stamps, and disability payments.

Table 2
Selected Socioeconomic Characteristics

CHARACTERISTIC	ISLAND OF HAWAI‘I	HILO
Total Population	148,677	40,759
Percent Caucasian	31.5	17.1
Percent Asian	26.7	38.3
Percent Hawaiian	9.7	13.1
Percent Two or More Races	28.4	29.7
Median Age (Years)	38.6	38.6
Percent Under 18 Years	26.1	24.7
Percent Over 65 Years	13.5	16.7
Percent Households with Children	21.3	36.1
Average Household Size	2.75	2.7
Median Family Income	$39,805	$35,506
Percentage of Population Below 100% of Federal Poverty Level	15.7	11.7
Percent Housing Vacant	15.5	9.0

Source: U.S. Bureau of the Census. May 2001. *Profiles of General Demographic Characteristics, 2000 Census of Population and Housing, Hawai‘i.* (U.S. Census Bureau Web Page).

Impacts

The proposed action would facilitate additional development of the property in conformance with its designated single-family residential zoning and provide substantial social benefit through enhancement of educational and therapy opportunities for children. As discussed in Section 1.2, Easter Seals Hawai‘i is responding to severe budget cuts and the downturn in the economy, which has increased the need for group activities and therapy as well as program space for youth services. As a result, Easter Seals Hawai‘i now helps about three times as many children as in the year 2000.

3.2.2 Archaeological and Cultural Resources

Cultural Background of Hilo and Pi‘ihonua Ahupua‘a

The earliest historical knowledge of Hilo comes from legends written by Kamakau 1961) of a 16th century chief ‘Umi-a-Liloa (son of Liloa), who at that time ruled the entire island of Hawai‘i. Descendants of Umi and his sister-wife were referred to as “Kona” chiefs, controlling Ka‘ū, Kona, and Kohala, while descendants of Umi and his Maui wife were “Hilo” chiefs, controlling Hāmākua, Hilo, and Puna (Kelly 1981:1). According to Kamakau (1961), both sides fought over control of the island, desiring access to resources such as feathers, *māmaki* tapa, and canoes on the Hilo side, and *wauke* tapa, and warm lands and waters on the Kona side (c.f. Kelly 1981:3).

Sometime near the end of the 16th century or early in the 17th century, the lands of Hilo were divided into *ahupua‘a*, which till today retain their original names (Kelly 1981:3). These include the *ahupua‘a* of Pu‘u‘eo, Pi‘ihonua, Punahoa, Pōnohawai, Kūkūau and Waiākea. The design of these land divisions was such that residents could have access to all that they needed to live, with ocean resources at the coast, and agricultural and forest resources in the interior. However, only Pi‘ihonua and Waiākea provided access to the full range of resources stretching from the sea up to 6,000 feet along the slopes of Mauna Kea (Kelly 1981:5).

Historical accounts (McEldowney 1979) place the current study area in a zone of agricultural productivity. As Isabella Bird recorded upon arriving in Hilo in 1873:

> “Above Hilo, broad lands sweeping up cloudwards, with their sugar cane, kalo, melons, pine-apples, and banana groves suggest the boundless liberality of Nature” (Bird 1964:38).

Handy and Handy (1972) also described the general region as an agricultural area:

> “On the lava strewn plain of Waiakea and on the slopes between Waiakea and Wailuku River, dry taro was formerly planted wherever there was enough soil. There were forest plantations in Panaewa and in all the lower fern-forest zone above Hilo town along the course of the Wailuku River” (Handy and Handy 1972:539).

Maly (1996) referred to a 1922 article from the Hawaiian Language newspaper, Ka Nupepa Kūʻokuʻa, where planting on pāhoehoe lava flats is described:

> "There are pahoehoe lava beds walled in by the ancestors in which sweet potatoes and sugar cane were planted and they are still growing today. Not only one or two but several times forty (mau kaʻau) of them. The house sites are still there, not one or two but several times four hundred in the woods of the Panaewa. Our indigenous bananas are growing wild, these were planted by the hands of our ancestors" (Maly 1996:A-2).

As part of an archaeological assessment study, Maly (1996) conducted historical research for the lands of Wainaku, Pōnohawai, Waiākea, and Piʻihonua. He discussed the significance of the Hawaiian word *wai* within the place names: Pōnohawai, Waiākea, Wainaku, and Wailuku (River). According to Maly, the word *wai* (water) has strong metaphorical associations with the Hawaiian concept of wealth (*waiwai*), stressing its cultural importance (Maly 1996:A-2). In this context, the importance of Hilo can be better understood, with its copious streams that fed taro pondfields and its numerous fishponds. Maly refers to the origins of the names Waiākea and Piʻihonua in the Hawaiian legend of Kaʻao Hoʻoniua Puʻuwai no Ka-Miki. Piʻihonua literally translates to: "Ascending Earth," and the *ahupuaʻa* is named for Piʻihonua-a-ka-lani, the brother of Waiākea and Panaʻewa, and the father of the chiefesses ʻOhele and Waiānuenue (Maly 1996:A-4).

Piʻihonua, the *ahupuaʻa* containing the project site, were held along with Punahoa and Waiākea by Kamehameha I until the time of his death in 1819, at which time his holdings, including Piʻihonua, were passed down to his son, Liholiho. Kelly (1981) speculates that Piʻihonua may have been given to Chief Kalaeokekio by Kauikeaouli or Boki in 1828. Piʻihonua was surrendered at the time of the Māhele and classified as Crown Land (Kelly 1981); tax maps indicate that no *kuleana* (commoner home or farms sites) claims were registered for lands on or adjacent to the project site.

Following the Māhele, the population of Hilo grew and the scattered upland habitations gave way to sugar cultivation (McEldowney 1979:37). At the turn of the century, there were remnants of *heiau* and at least one intact *heiau* within Piʻihonua. Thrum (1907) describes a *heiau* named Kaipālaloa that had been destroyed and another called Papio, which was reportedly for bird catchers and canoe builders. Stokes (1991) reported another heiau in Piʻihonua called Pinao that was once located near the intersection of Waiānuenue and Ululani Streets (Maly 1996).

Beginning in the late 1880s, Piʻihonua was home to the Hawaii Mill Company, built on the Alenaio Stream (Kelly 1981). By 1905, according to Thrum (1923) the Hawaii Mill Company had 10 miles of cane flumes and produced twenty-five tons of sugar per day. In 1920 the Hawaii Mill Company was taken over by the Hilo Sugar Company (Kelly 1981). Commercial sugar production lasted in Piʻihonua until the mid-twentieth century, at which time many of the fields were converted to pasturage associated with cattle ranching.

Resources on the Project Site

Much of the portion of the subject property proposed for the new addition has been previously disturbed by construction of the parking lot and possible earlier uses. Furthermore, although there is a stream that is tributary to the Wailuku River not far north of the property, no caves, *pu‘u* (cinder cone hills), native forest groves, gathering resources or other natural features are present on or near the project site. The vegetation is highly disturbed and does not contain the quality and quantity or resources that would be important for native gathering.

The State Historic Preservation Division (SHPD) was contacted by letter on June 29, 2010 by Geometrician Associates, acting as an agent of the County of Office of Housing and Community Development, and asked for concurrence with the finding of no effect to historic properties. In a letter of August 5, 2010 (see Appendix 1a), SHPD replied that although no historic properties are apparent on the project site, subsurface remains could possibly be present and thus effects to historic properties could not yet be determined. SHPD asked to be contacted by phone for assistance in determining an appropriate scope for archaeological work. In a subsequent phone conversation, it was determined that an archaeological monitoring plan would be prepared for SHPD approval prior to construction, and that Easter Seals Hawai‘i would retain an archaeologist during the ground disturbance phase of the construction, including utility connections.

In summary, no cultural properties or gathering resources appear to be present, and current information does not indicate any significant archaeological remains that reflect history or prehistory or support cultural values.

Impacts and Mitigation Measures

As no archaeological sites, other historic properties, or resources or practices of a potential traditional cultural nature appear to be present on or near the project site, the proposed expansion of the educational and therapy facility would not appear to impact any culturally valued resources or cultural practices. In particular, the exercise of native Hawaiian rights related to gathering, access or other customary activities will not be affected, and there will be no adverse effect upon cultural practices or beliefs. This Draft EA has been distributed to agencies and groups who might have knowledge in order to confirm this finding.

If any lava tubes, human remains, or archaeological resources such as cultural deposits, artifacts, middens, pavings, etc. are encountered during monitoring, work in the immediate area of the discovery will be halted and SHPD contacted as outlined in Hawai‘i Administrative Rules 13§13-275-12.

3.3 Infrastructure

3.3.1 Utilities

Existing Facilities and Services

Electrical power to the project site is provided by Hawai‘i Electric Light Company (HELCO), a privately owned utility company regulated by the State Public Utilities Commission, via their island-wide distribution network. Telephone service is provided via Voice Over Internet Protocol. The site has municipal water service with the County of Hawai‘i Department of Water Supply and is served by an existing 6-inch line and 5/8-inch meter, which is limited to an average daily usage of 400 gallons (see letter from County Dept. of Water Supply, Appendix 1a). The municipal sewer does not extend to the project site and the facility instead uses a septic tank.

Impacts and Mitigation Measures

Because of the limited scope of the improvements, the proposed addition would not have any substantial impact on existing utility services. Coordination between the architect and DWS indicates that the existing water service is adequate for the entire center. Similarly, the septic tank is adequate for the minor scale of the addition.

Solid waste will be dealt with through aggressive recycling, with the remainder hauled to the South Hilo Sanitary Landfill. A Solid Waste Management Plan will be developed as part of Plan Approval.

In summary, the utility infrastructure for the facility is adequate and no adverse impacts are expected.

3.3.2 Traffic, Parking and Police/Fire/Emergency Services

The project site is bordered by Ka‘iulani Street, a two-lane, two-way County local road that extends one block west from Waianuenue Avenue and continues across a bridge and several thousand feet to the southwest before coming to a dead-end. Wailuku Drive, also a two-lane, two-way County local road that extends south from Kamehameha Avenue near Hilo Bayfront, ends at a “T” intersection with Ka‘iulani Street near the Easter Seals facility. A driveway off Ka‘iulani Street will provide access to the project site. The project includes expanding available paved parking areas, including an additional handicap-accessible space.

The current center generates minimal traffic of approximately 50 trips per day, mostly associated with staff and visits by participants in programs at the facility. The project will slightly increase traffic on the order of 10 percent, a minimal increase that does not require mitigation. Parking will consist of the existing eight parking stalls and the project will add two more stalls, including a second handicap-accessible space in accordance with Hawai‘i County Code Section 25-4.

Fire, police and emergency management services are readily available. A police station is located on Kapiolani Street approximately 0.7 miles away and the Central fire station is located within a half-mile (see Figure 1). EMT services are provided by the Hawai‘i County Fire Department. Acute care services are available at Hilo Medical Center, approximately 1.5 miles from the project site.

3.4 Secondary and Cumulative Impacts

Cumulative impacts result when implementation of several projects that individually have limited impacts combine to produce more severe impacts or conflicts in mitigation measures.

Projects in the area with the potential to interact with Easter Seals addition are occurring at nearby schools. The 2010 Hawai‘i State Legislature appropriated $24 million dollars for a gymnasium for Hilo High School that will be located about 1,000 feet to the south along Waianuenue Avenue (see Figure 1 for location). In addition, Hilo Intermediate School, located about 2,000 feet south along Waianuenue Avenue, is slated to receive $2.8 million for a whole-school renovation.

If the proposed Easter Seals Hawai‘i-Hilo Service Center facility addition is built simultaneously with construction of the Hilo High School gymnasium and the whole-school renovation of Hilo Intermediate School, there is potential for cumulative traffic impacts during construction. The EA for the Hilo High Gymnasium, the only project with potential to generate any substantial traffic, lists extensive mitigation measures for traffic that should reduce impacts to minimal levels (*OEQC Environmental Notice* 5/23/2010).

In summary, the adverse effects of the project –minor and temporary disturbance to air quality, noise, visual and traffic congestion quality during construction – are quite limited in severity, nature and geographic scale. No cumulative impacts are foreseen from the project at this time.

3.5 Required Permits and Approvals

The following permits and approvals would be required:

- Hawai‘i County Building Division Approval and Building Permit
- Hawai‘i County Planning Department Plan Approval

3.6 Consistency with Government Plans and Policies

3.6.1 Hawai‘i State Plan

Adopted in 1978 and last revised in 1991 (Hawai‘i Revised Statutes, Chapter 226, as amended), the Plan establishes a set of themes, goals, objectives and policies that are meant to guide the State’s long-run growth and development activities. The three themes that express the basic purpose of the *Hawai‘i State Plan* are individual and family self-sufficiency, social and economic mobility and community or social well-being. The proposed expansion of the Easter Seals Hawai‘i-Hilo Service Center would provide services beneficial to the social well-being of the East Hawai‘i community and the project is consistent in every sense with the plan.

3.6.2 Hawai‘i County Zoning and General Plan

The *Hawai‘i County General Plan Land Use Pattern Allocation Guide (LUPAG)*. The LUPAG map component of the *General Plan* is a graphic representation of the Plan’s goals, policies, and standards as well as of the physical relationship between land uses. It also establishes the basic urban and non-urban form for areas within the planned public and cultural facilities, public utilities and safety features, and transportation corridors. The project site is classified as Medium Density Urban in the LUPAG, which is characterized as single-family and multiple-family residential (up to 35 units per acre) and related functions. The proposed addition is consistent with this designation, which is intended for residential use, with ancillary community and public uses, and village and neighborhood commercial uses.

Hawai‘i County Zoning and SMA. The County zoning designation for the project site is Single-Family Residential (RS-7.5) (minimum lot size 7,500 sf), where adult day care homes, meeting facilities, and public uses and structures are permitted uses under Section 25-5-3 of the County’s zoning code. Plan approval by the Hawai‘i County Planning Department will be required. The property is not situated within the County’s Special Management Area (SMA).

The *General Plan* for the County of Hawai‘i is a policy document expressing the broad goals and policies for the long-range development of the Island of Hawai‘i. The plan was adopted by ordinance in 1989 and revised in 2005 (Hawai‘i County Planning Department). The *General Plan* itself is organized into thirteen elements, with policies, objectives, standards, and principles for each. There are also discussions of the specific applicability of each element to the nine judicial districts comprising the County of Hawai‘i. Most relevant to the proposed project are the following Standards, Goals and Policies:

HEALTH – POLICIES

- Encourage the establishment or expansion of community health centers and rural health clinics.

RECREATION – POLICIES

- Provide facilities and a broad recreational program for all age groups, with special considerations for the handicapped, the elderly, and young children.
- Coordinate recreational programs and facilities with governmental and private agencies and organizations. Innovative ideas for improving recreational facilities and opportunities shall be considered.

ECONOMIC – POLICIES

- Support all levels of educational, employment and training opportunities and institutions.

The project is highly consistent with these goals and policies.

3.6.3 Hawai‘i State Land Use Law

All land in the State of Hawai‘i is classified into one of four land use categories – Urban, Rural, Agricultural, or Conservation – by the State Land Use Commission, pursuant to Chapter 205, HRS. The property is in the State Land Use Urban District. The planned use conforms with this State Land Use District designation.

PART 4: DETERMINATION

Based on information to this point, the County of Hawai‘i Office of Housing and Community Development has preliminarily determined that the project will not significantly alter the environment, as impacts will be minimal, and that an Environmental Impact Statement is not warranted. The Office of Housing and Community Development is thus expected to issue a Finding of No Significant Impact (FONSI). Comments on the Draft EA will be reviewed in order to ascertain whether this anticipated determination is appropriate.

PART 5: FINDINGS AND REASONS

Chapter 11-200-12, Hawai‘i Administrative Rules, outlines those factors agencies must consider when determining whether an Action has significant effects:

1. *The proposed project will not involve an irrevocable commitment or loss or destruction of any natural or cultural resources.* No valuable natural or cultural resources would be committed or lost. Archaeological monitoring will be conducted during initial ground disturbance to ensure that impacts to potential subsurface resources are avoided.
2. *The proposed project will not curtail the range of beneficial uses of the environment.* No restriction of beneficial uses would occur.
3. *The proposed project will not conflict with the State's long-term environmental policies*. The State’s long-term environmental policies are set forth in Chapter 344, HRS. The broad goals of this policy are to conserve natural resources and enhance the quality of life. The project is minor and fulfills aspects of these policies calling for an improved educational and health environment. It is thus consistent with the State’s long-term environmental policies.
4. *The proposed project will not substantially affect the economic or social welfare of the community or State.* The project would not have any adverse effect on the economic or social welfare of the County or State, and would benefit the environmental and health welfare of East Hawai‘i.
5. *The proposed project does not substantially affect public health in any detrimental way.* The proposed addition would not be detrimental to public health in any way, and would allow a non-profit organization to improve the quality of services it provides.
6. *The proposed project will not involve substantial secondary impacts, such as population changes or effects on public facilities*. No secondary effects are expected to result from the proposed addition.
7. *The proposed project will not involve a substantial degradation of environmental quality*. The project is minor and environmentally benign, and thus would not contribute to environmental degradation.

8. *The proposed project will not substantially affect any rare, threatened or endangered species of flora or fauna or habitat.* The project site supports non-native weedy vegetation. Impacts to rare, threatened or endangered species of flora or fauna will not occur. The project will not disturb or remove the vegetation higher than 15 feet during critical pupping months for the Hawaiian hoary bat, between May 15 and August 15 of each year.
9. *The proposed project is not one which is individually limited but cumulatively may have considerable effect upon the environment or involves a commitment for larger actions.* The project is not related to other activities in the region in such a way as to produce adverse cumulative effects or involve a commitment for larger actions.
10. *The proposed project will not detrimentally affect air or water quality or ambient noise levels.* No adverse effects on these resources would occur. Mitigation of construction-phase impacts will preserve water quality. Ambient noise impacts due to construction will be temporary and restricted to daytime hours.
11. *The project does not affect nor would it likely to be damaged as a result of being located in environmentally sensitive area such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal area.* Although the project is located in an area with volcanic and seismic risk, the entire Island of Hawai‘i shares this risk, and the project is not imprudent to construct. The addition will employ design and construction standards appropriate to the seismic zone.
12. *The project will not substantially affect scenic vistas and viewplanes identified in county or state plans or studies.* No scenic vistas and viewplanes will be adversely affected by the project.
13. *The project will not require substantial energy consumption*. The construction and operation of the addition would require minimal consumption of energy. No adverse effects would be expected.

For the reasons above, the proposed action will not have any significant effect in the context of Chapter 343, Hawai‘i Revised Statues and section 11-200-12 of the State Administrative Rules.

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ENVIRONMENTAL ASSESSMENT

EASTER SEALS HAWAIʻI
HILO SERVICE CENTER ADDITION

APPENDIX 1a
Comments in Response to Early Consultation

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Mr. Ron Terry
Geometricians LLC

Thank you for the opportunity to comment on the Environmental Impact Statement being prepared for proposed improvements to the Easter Seals facilities in Hilo. This is a very important service in our community and any new programs or expansion of services are welcome. I have several friends who utilize Easter Seals services and they speak frequently about the quality of the services and how important the support of Easter Seals is to their children and their families.

The existing facility is conveniently located and is within a mile of approximately 10 existing public and private schools serving pre-school to 12th grade. It is ideally located for efficient family and client access. The undeveloped portions of the property is overgrown with exotic species and use of the area would not impact any neighbors or special resources.

There is strong support for the Easter Seals program in or community and our family supports the expansion of the facility and the programs it provides.

Thanks you for the chance to comment.

Sincerely
Jeffrey Melrose and family
1405 Waianuenue Ave.
Hilo Hawaii, 96720

LINDA LINGLE
GOVERNOR OF HAWAII

CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
EPO-I-3213

June 14, 2010

Mr. Ron Terry, Principal
Geometrician Associates, LLC
P.O. Box 396
Hilo, Hawaii 96721

Dear Mr. Terry:

SUBJECT: Environmental Assessment for Easter Seals Hilo Facility Addition
Hilo, Island of Hawaii
TMK: (3)2-3-015:056

Thank you for allowing us to review and comment on the subject application. The application was routed to the various branches of the Environmental Health Administration. We have the following Indoor and Radiological Health Branch and General comments.

Indoor & Radiological Health Branch

"Project activities shall comply with the Administrative Rules of the Department of Health:

- Chapter 46 Community Noise Control

Should there be any questions, please contact Russell S. Takata, Environmental Health Program Manager, Indoor & Radiological Health Branch at 586-4701."

General

We strongly recommend that you review all of the Standard Comments on our website: www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this project should be adhered to.

The same website also features a Healthy Community Design Smart Growth Checklist (Checklist). The Hawaii State Department of Health, Built Environment Working Group, recommends that State and county planning departments, developers, planners, engineers and

other interested parties apply the healthy built environment principles in the Checklist whenever they plan or review new developments or redevelopments projects. We also ask you to share this list with others to increase community awareness on healthy community design.

If there are any questions about these comments please contact the Environmental Planning Office at 586-4337.

Sincerely,

Genevieve Salmonson

GENEVIEVE SALMONSON, Acting Manager
Environmental Planning Office

LINDA LINGLE
GOVERNOR OF HAWAII

CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
EMD / CWB

06050PSW.10

June 17, 2010

Mr. Ron Terry
Principal
Geometrician Associates
PO Box 396
Hilo, Hawaii 96721

Dear Mr. Terry:

SUBJECT: **Environmental Assessment for**
Easter Seals Hilo Facility Addition
Hilo, Island of Hawaii, Hawaii
Tax Map Key: 2-3-015:056

The Department of Health, Clean Water Branch (CWB), has reviewed the document received June 7, 2010, regarding the subject project and offers these comments. Please note that our review is based solely on the document for the subject project and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at http://hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf

1. Any project and its potential impacts to State waters must meet the following criteria:

    a. Anti-degradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.

    b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.

    c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

2. You may be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form:

   a. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. This includes areas used for a construction base yard and the storage of any construction related equipment, material, and waste products. An NPDES permit is required before the start of the construction activities.

   b. Hydrotesting water,

   c. Construction dewatering effluent.

   You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI forms may be picked up at our office or downloaded from our website at http://hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html

3. For other types of wastewater not listed in Item No. 2 above or wastewater discharging into Class 1 or Class AA waters, an NPDES individual permit will need to be obtained. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at http://hawaii.gov/health/environmental/water/cleanwater/forms/environmental/water/cleanwater/forms/indiv-index.html

4. Please call the Army corps of Engineers at (808) 438-9258 to determine which Department of the Army (DA) permit(s) shall be required for the subject project. Permits may be required for work performed in, over, and under navigable waters of the United States. Projects requiring a DA permit also require a Section 401 Water Quality Certification (WQC) from our office.

5. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of $25,000 per day per violation.

If you have any questions, please visit our website at http://hawaii.gov/health/environmental/water/cleanwater/index.html, or contact the Engineering Section, CWB, at 586-4309.

Sincerely,

Alec Wong

ALEC WONG, P.E. CHIEF
Clean Water Branch

SW:ml

c: DOH-EPO #I-3213 [via email only]

LINDA LINGLE
GOVERNOR OF HAWAII

CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O.BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
EMD/SDWB

July 15, 2010

Mr. Ron Terry, Principal
Geometrician Associates
P.O. Box 396
Hilo, Hawaii 96721

Dear Mr. Terry:

SUBJECT: EARLY CONSULTATION FOR ENVIRONMENTAL ASSESSMENT
EASTER SEALS HILO FACILITY ADDITION
49 KAIULANI STREET
HILO, HAWAII
TMK: (3) 2-3-015: 056

Thank you for the opportunity to review and comment on the subject document. We would like to offer the following comments:

DRINKING WATER

A clear and complete description of how drinking water will be supplied to the proposed project must be provided. For instance, will water service be provided by the local county water department or will the project involve the construction of a new public water system?

Federal and state regulations define a public water system as a system that serves 25 or more individuals at least 60 days per year or has at least 15 service connections. All public water system owners and operators are required to comply with Hawaii Administrative Rules, Chapter 11-20, Rules Relating to Potable Water Systems and Chapter 11-25, Rules Relating to Certification of Public Water System Operators.

Section 29 of Chapter 11-20 requires that all new sources of drinking water serving a public water system be approved by the Director of Health prior to its use. Such an approval is based primarily upon the submission of a satisfactory engineering report which addresses the requirements set in Section 11-20-29.

Section 29.5 of Chapter 11-20 requires that all new community public water systems demonstrate adequate technical, managerial, and financial capacity to reliably and consistently produce and deliver drinking water in compliance with all state and federal drinking water regulations, in effect or likely to be in effect when operations begin.

UNDERGROUND INJECTION CONTROL (UIC)

Injection wells used for the subsurface disposal of wastewater, sewage effluent, return flow, or surface runoff are subject to environmental regulation and permitting under Hawaii Administrative Rules, Chapter 11-23, Underground Injection Control. The Department of Health's approval must be first obtained before any injection well construction commences. A UIC permit must be issued before any injection well operation occurs.

Authorization to use an injection well is granted when a UIC permit is issued to the injection well facility. The UIC permit contains discharge and operating limitations, monitoring and reporting requirements, and other facility management and operational conditions. A UIC permit application form is needed to apply for a UIC permit.

A UIC permit can have a valid duration of up to five years. Permit renewal is needed to keep an expiring permit valid for another term.

Please be sure to send us a copy of the EA so that we may be able to review the information in these areas and provide comments. If you should have any questions please call me or my staff in the Engineering (for public water systems) or the Groundwater Pollution Control (for UIC) Sections at 586-4258.

Sincerely,

STUART YAMADA, P.E., CHIEF
Safe Drinking Water Branch
Environmental Management Division

SY:slm

DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAI'I
345 KEKŪANAŌ'A STREET, SUITE 20 • HILO, HAWAI'I 96720
TELEPHONE (808) 961-8050 • FAX (808) 961-8657

July 19, 2010

Mr. Ron Terry
Geometrician Associates, LLC
P. O. Box 396
Hilo, HI 96721

PRE-ENVIRONMENTAL ASSESSMENT CONSULTATION
EASTER SEALS HILO FACILITY ADDITION
TAX MAP KEY 2-3-015:056

This is in response to your Pre-Environmental Assessment consultation letter, June 1, 2010.

We have no objection to the proposed project. Please be informed that there is an existing 6-inch waterline within Kaiulani Street fronting the property and the existing facility is served by a 5/8-inch meter, which is limited to an average daily usage of 400 gallons.

Should there be any questions, you may contact Mr. Finn McCall of our Water Resources and Planning Branch at 961-8070, extension 255.

Sincerely yours,

Milton D. Pavao, P.E.
Manager

FM:dfg

William P. Kenoi
Mayor

BJ Leithead Todd
Director

Margaret K. Masunaga
Deputy

County of Hawai'i

PLANNING DEPARTMENT
Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawai'i 96720
Phone (808) 961-8288 • Fax (808) 961-8742

July 21, 2010

Mr. Ron Terry
Geometrician Associates, LLC
P.O. Box 396
Hilo, HI 96721

Dear Mr. Terry:

Subject: **Pre-Environmental Assessment Consultation**
Applicant: **Easter Seals Hawaii**
Land Owner: **State of Hawaii**
Project: **Easter Seals Hilo Facility Addition**
TMK: **2-3-15:56, Hilo, Hawaii**

This is in response to your request for comments on the above-referenced project.

According to your submittal, Easter Seals Hawai'i plans to expand and improve its facility in Hilo. The project will add 1,500 square feet of new interior space and seven new parking stalls. It will also involve minor interior renovation and roof replacement at the existing building.

We have the following to offer:

1. This one (1) acre parcel is designated Urban by the State Land Use Commission.

2. The County zoning is Single-Family Residential (RS-7.5).

3. The General Plan designation is Medium Density Urban, which is characterized as *"Village and neighborhood commercial and single family and multiple family residential and related functions (multiple family residential – up to 35 units per acre)".*

4. Plan Approval will be required for the proposed additions.

5. The parcel is not located within the County's Special Management Area.

Please provide us with a copy of the Draft Environmental Assessment for our review and file.

If you have questions, please feel free to contact Esther Imamura of this office at 961-8139.

Sincerely,

BJ LEITHEAD TODD
Planning DIRECTOR

ETI:cs
P:\Public\Wpwin60\ETI\Eadraftpre-Consul\Terry Easter Seals 2-3-15-56 Addn.Rtf

United States Department of the Interior

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

In Reply Refer To:
2010-TA-0379

JUL 29 2010

Ron Terry, Ph.D.
Geometrician Associates, LLC
P.O. Box 396
Hilo, Hawaii 96721

Subject: Early Consultation for an Environmental Assessment for the Proposed Easter Seals Hilo Addition, Hawaii

Dear Dr. Terry:

Thank you for your letter dated June 29, 2010, which we received on July 1, 2010, requesting information for your use in the preparation of an Environmental Assessment (EA) for the proposed Easter Seals Hilo Addition project. Easter Seals Hawaii plans to expand and improve its facility which is located on a 1.0-acre property [TMK: (3rd.) 2-3-015:056] leased from the State of Hawaii in Hilo, on the island of Hawaii. The proposed project includes developing 1,500 square feet of new interior space and seven new parking stalls and repairing the interior and replacing the roof of an existing building.

We have reviewed the project information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program and the Hawaii GAP Program. The threatened Newell's shearwater (*Puffinus auricularis newelli*) and endangered Hawaiian petrel (*Pterodroma phaeopygia sandwichensis*) (collectively referred to as seabirds) are known to traverse the project site. Additionally, the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) and Hawaiian hawk (*Buteo solitarius*) occur in the project vicinity.

In your letter you indicate that because the project site is in an urban area and because no lighting or erect structures will be installed, you do not anticipate any impacts to seabirds or the Hawaiian hawk. We agree the risks of adverse project impacts to these species are low. To minimize potential project impacts to the Hawaiian hoary bat, woody plants greater than 15-feet tall should not be removed or trimmed during the bat birthing and pup rearing season (April 15 through August 15).

Hawaii's native ecosystems are heavily impacted by exotic invasive plants. We recommend you use native plants for landscaping purposes whenever possible. If native plants do not meet the landscaping objectives, we recommend you chose species that are thought to have a low risk of becoming invasive. The following websites are good resources to use when choosing landscaping

plants: Pacific Island Ecosystems at Risk (http://www.hear.org/Pier/), Hawaii-Pacific Weed Risk Assessment (http://www.botany.hawaii.edu/faculty/daehler/wra/full_table.asp) and Global Compendium of Weeds (www.hear.org/gcw).

Thank you for the opportunity to provide comments related to your EA. If you have any questions regarding this letter, please contact Dr. Jeff Zimpfer, Fish and Wildlife Biologist, Consultation and Habitat Conservation Planning Program (phone: 808-792-9431; email: jeff_zimpfer@fws.gov).

Sincerely,

for Loyal Mehrhoff
Field Supervisor

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

August 5, 2010

Mr. Ron Terry
Geometrician Associates
P. O. Box 396
Hilo, Hawaii 96721
(rterry@hawaii.rr.com)

LOG NO: 2010.2670
DOC NO: 1008TD08
Archaeology

Dear Mr. Terry:

Subject: **Chapter 6E-8 and National Historic Preservation Act Section 106 Consultation – Notice of Preparation, Draft Environmental Assessment for Easter Seals Facility Pi'ihonua Ahupua'a, South Hilo District, Island of Hawai'i TMK: (3) 2-3-015: 056**

Thank you for notifying us of this proposed project, which includes improvements at the Hilo Easter Seals Society facility on Kaiulani Street in Hilo. The proposed work includes expansion of the paved parking area and a new 1500 square foot building with an adjacent covered play area. The improvements are being funded by the U.S. Department of Housing and Urban Development (HUD).

We have no records of previous archaeological work within the subject 1.0-acre State-owned parcel. A reconnaissance survey was conducted of the adjacent parcel to the south and west (Parcel 1) by PHRI in 1988. At that time, no surface evidence of historic properties was located; however, subsurface testing was recommended due to the location of the property in the context of historic Hilo and adjacent to Waikapu River. Testing was not conducted as the property was not selected for development (M. Rosendahl 1988).

Photos and text provided in your letter dated June 29, 2010 indicate that the proposed expansion area has "scattered broken rocks, push piles of soil and scraped pahoehoe". A brief site visit was conducted by SHPD staff archaeologist Theresa K. Donham on August 4, 2010. It appears that a portion of the expansion area has little to no soil and other areas could have undisturbed soil deposits beneath the disturbed surface deposits.

At this time we cannot make a determination regarding the effect of the project on historic properties. We recommend that additional investigation occur within the proposed expansion area, due to the potential for undisturbed subsurface cultural deposits and features, and the potential for lava tube caves within the area a raised pahoehoe. Please contact our office for assistance in developing an appropriate scope of work for further investigation of this area. If you have any questions at this time, please contact Theresa Donham at (808) 933-7653.

Aloha,

Theresa K. Donham, Acting Branch Cheif
Historic Preservation Division

ENVIRONMENTAL ASSESSMENT

EASTER SEALS HAWAIʻI
HILO SERVICE CENTER ADDITION

APPENDIX 2
Federal Environmental Assessment

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U.S. Department of Housing
And Urban Development
Pacific/Hawai'i Office of
Community Planning and Development
Environmental Branch

Environmental Assessment

(HUD recommended format per
24 CFR 58.36, revised 1/99)

Project Identification: **Easter Seals Hawai'i-Hilo Service Center Addition**

Preparer: **Geometrician Associates**

Responsible Entity: **Office of Housing and Community Development, County of Hawai'i**

August 2010

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Responsible Entity:	**Office of Housing and Community Development, County of Hawai‘i**
Certifying Officer:	Stephen Arnett, Director
Project Name:	Easter Seals Hawai‘i-Hilo Service Center Addition
Project Location:	Hilo, South Hilo District, Island of Hawai‘i
Estimated Total Project Cost:	$900,000 (estimated)
Grant Recipient:	Easter Seals Hawai‘i
Recipient Address:	710 Green Street
	Honolulu, Hawai‘i 96813
Project Representative:	John Howell, President and CEO
Telephone Number:	(808) 536-1015

FINDING:

☑ **Finding of No Significant Impact** (The project will not result in a significant impact on the quality of the human environment)

☐ **Finding of Significant Impact** (The project will result in a significant impact on the quality of the human environment)

Preparer Signature Date 8/9/10

Name/Title/Agency Ron Terry, Principal, Geometrician Associates, Consultant

Signature _____ Date _____

Name/Title/Agency Stephen Arnett, Housing Administrator, County of Hawai‘i Office of Housing and Community Development

Signature _____ Date _____

Name/Title/Agency Bobby-Jean Leithead Todd, Director, County of Hawai‘i Planning Dept.

Signature _____ Date _____

Title/Agency _____County of Hawai‘i Office of Corporation Counsel

Approving Official Signature _____ Date _____

Name/Title/Agency William P. Kenoi, Mayor, County of Hawai‘i

Statement of Purpose and Need for the Proposal *AND* Description of the Proposal:
Include all contemplated actions which are logically either geographically or functionally a part of the project, regardless of the source of funding.

Purpose and Need and Project Description

Easter Seals Hawai'i provides exceptional services to ensure that all people with disabilities or special needs and their families have equal opportunities to live, learn, work and play in their communities. The organization has been serving special needs children, youth and adults for 64 years, providing more than 450,000 hours of direct service annually to individuals and families across the State.

Easter Seals Hawai'i is planning a building addition to its facility situated on State of Hawai'i land on Kaiulani Street in Hilo (see **Exhibits A1-3**). The addition will provide 1,500 square feet of new interior space and two new parking stalls, along with minor interior renovation and roof replacement at the existing building. No substantial new services are involved, but rather expansion of existing services.

Easter Seals Hawai'i is helping about three times as many children in 2010 as in the year 2000. The downturn in the national economy has produced severe budget cuts, to which the organization has responded by returning to a focus on delivering services at its service center. With more children coming to the center, there is increasing need to provide room for group activities and therapy as well as program space for new youth services.

Relationship to Other Projects and Environmental Documents

A State of Hawai'i Environmental Assessment in compliance with Chapter 343, Hawai'i Revised Statutes, has been prepared concurrently with this NEPA-compliant EA. The State EA is contained as **Exhibit G** of this EA (copies of this NEPA EA are also being circulated as an appendix to the State EA). No other environmental documents are being prepared or are required for the project, and there are no functionally related projects.

Projects in the area with the potential to interact with Easter Seals addition are occurring at nearby schools. The 2010 Hawai'i State Legislature appropriated $24 million dollars for a gymnasium for Hilo High School that will be located about 1,000 feet to the south along Waianuenue Avenue (see **Exhibit A2** for location). In addition, Hilo Intermediate School, located about 2,000 feet south along Waianuenue Avenue, is slated to receive $2.8 million for a whole-school renovation. Although the projects are in no way related to the Easter Seals addition, they are listed here in order to provide context for the discussion of cumulative impacts to specific resource areas detailed below.

Existing Conditions and Trends: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project.

As discussed above, Easter Seals Hawai'i is helping many more children than previously and has returned to a focus on delivering services at its service center, which needs more space. There are no other agencies or organizations that can fill the need of this project.

Index of Exhibits

Exhibit	Reference
A1-A3	Area Map-Airphoto, TMK Map, and Site Plan
B	Endangered Species Act Section 7 Correspondence
C.	Wild and Scenic Rivers by State, National Park Service Web Page, checked July 2010 http://www.rivers.gov/maps/conus-072.pdf
D.	Nonattainment Area List, U.S. Environmental Protection Agency Web Page, checked July 2010. http://www.epa.gov/oar/oaqps/greenbk/astate.html
E.	Correspondence with State Historic Preservation Division
F.	EPA Map of Sole Source Aquifers in Hawai‘i, checked January 2010.
G.	State of Hawai‘i Environmental Assessment (in copies being circulated as part of State EA process, this HUD EA is itself included as Appendix 2)
H.	Lava Flow Hazard Zone Maps, U.S. Geological Survey http://hvo.wr.usgs.gov/hazards/lavazones/
I.	Hawai‘i CZM Consistency Material (program letter of June 24, 2004, stating that CZM no longer reviews HUD assistance programs and that applicants are no longer required to obtain CZM federal consistency approval for HUD assisted activities)
J.	National Wetlands Inventory Map of Project Area (checked July 2010) http://www.fws.gov/wetlands/

Statutory Checklist

For each listed statute, executive order or regulation, record the determinations made. Note reviews and consultations completed as well as any applicable permits or approvals obtained. Attach evidence that all required actions have been taken. Record any conditions or mitigation measures required. Then, make a determination of compliance or consistency.

Factors	Determinations and Compliance Documentation
Historic Preservation [36 CFR 800]	No historic properties are recorded for the site or are evident. The State Historic Preservation Division (SHPD) has determined that archaeological monitoring during initial ground disturbing construction is necessary. **Exhibit E** provides correspondence to and from SHPD.
Floodplain Management [24 CFR 55, Exec. Ord. 11988]	No known flood hazards are present, and the entire project is within Zone X, outside the 500-year floodplain. The project would not impact floodplains directly or indirectly, would not be located in a designated Special Flood Hazard Area, and is consistent with EO 11988.
Wetlands Protection [Exec. Ord. 11990]	Field inspection by Geometrician Associates in September 2009, consultation of USFWS system wetlands maps, and informal consultation with the U.S. Army Corps of Engineers indicate that no wetlands are present on the project site (**Exh. J,** NWI wetlands map).
Coastal Zone Management Act [Sections 307 (c), (d)]	The State CZM program stated in a letter of June 24, 2004, that CZM no longer reviews HUD assistance programs and that applicants are no longer required to obtain CZM federal consistency approval for HUD assisted activities (**Exh. I,** CZM letter).
Sole Source Aquifers [40 CFR 149]	The project is not located in a U.S. Environmental Protection Agency-designated sole source aquifer area (**Exh. F,** EPA map of Designated Sole Source Aquifers in Hawai‘i).

HUD Environmental Standards	Determinations and Compliance Documentation
Endangered Species Act [50 CFR 402]	The ground area planned for new work (which makes up about 5,400 square feet) appears to have been largely disturbed in the past through construction of the parking lot, although some ungraded areas are also present (see **Exhibits A1-3**). The vegetation here has been managed through herbicide and chopping, with unmanaged edges. All plant species within and directly adjacent to the area planned for the new facility are non-natinve plants, as detailed in the table in the letter to the U.S. Fish and Wildlife Service of June 16, 2010 (see **Exh. B**). Although there is a stream that is tributary to the Wailuku River north of the property, no streams, ponds, wetlands, native forest groves or other important habitat areas would be affected. Endangered terrestrial vertebrates may be present in this part of Hilo and may overfly, roost, nest, or utilize resources here, including the endangered Hawaiian Hawk (*Buteo solitarius*), the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), the endangered Hawaiian Petrel (*Pterodroma sandwichensis*), and the threatened Newell's Shearwater (*Puffinus auricularis newelli*). No temporary or permanent lighting or erect structures such as poles are planned, and therefore impacts to listed seabirds are not anticipated. No removal of large trees will be necessary, and as the Easter Seals Hawai'i-Hilo service center is within an urban area with frequent lawn mowing, tree trimming, school activities, and other uses, it would appear that there is very little potential for Hawaiian Hawks to be present at the site or to be disturbed by the construction if they are nesting nearby. There is at least some chance that Hawaiian hoary bats may roost within some of the tall shrubs and low (10-20 foot tall) trees that will be removed or trimmed. Easter Seals Hawai'i will specifically refrain from activities that disturb or remove shrubs and trees taller than 15 feet during critical pupping months for the Hawaiian hoary bat, between May 15 and August 15 of each year. **Exhibit B** provides correspondence to and from the U.S. Fish and Wildlife Service.
Wild and Scenic Rivers Act [Sections 7(b-c)	Hawai'i has no Wild and Scenic Rivers named in National Park Service "National Wild and Scenic Rivers System" listing (**Exh. C**).

HUD Environmental Standards	Determinations and Compliance Documentation
Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]	The air quality of the subject area is not greatly affected by man-made air pollutants. In general, 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 Environmental Protection Agency and the State Department of Health, Clean Air Branch. Local air quality impacts from short-term construction dust and long-term automotive emissions will occur but will not be substantial (**Exh. D**).
Farmland Protection Policy Act [7 CFR 658]	Consultation of maps on file at the U.S. Natural Resources Conservation Service offices in Hilo, Hawai'i, indicate that no Prime, Unique or Other Important Agricultural lands are present on or near the site, which is within an Urban area and thus unclassified. The project would not adversely impact farmland or farming in any way.
Environmental Justice [Executive Order 12898]	2000 U.S. Census of Population statistics show that the Hilo community was 82.9 percent minority in ethnic makeup, compared to 68.5 percent for the island as a whole. Asians are the largest minority, at 38.3 percent. The percentage of the population below 100 percent of the federal poverty level in Hilo was 11.7 percent, compared to 15.7 percent for the island as a whole. The median family income in 2000 in Hilo was $35,506, compared to $39,805 for the island as a whole. There are no known adverse impacts of the project that would disproportionately affect low-income and minority populations in any adverse way. The project will benefit people with disabilities or special needs and their families from all populations.
Noise Abatement and Control [24 CFR 51 B]	The components of the project that would produce noise are associated with construction. By law, all construction projects in Hawai'i must comply with the Administrative Rules of the Department of Health, Chapter 11-46, on "Community Noise Control". If appropriate, a Construction Noise Permit will be obtained, which will specify measures to minimize noise impacts such as the use of mufflers and implementing construction curfew periods. The project site is within one to five miles of significant noise generators including heavy industrial activity, airports, and major highways, but no significant noise problems exist.
Toxic or Hazardous substances and Radioactive Materials [HUD Notice 79-33]	Field inspection determined that there is no evidence of toxic or hazardous conditions on or near the property. No USTs or any potential offsite contamination sources are present.
Siting of HUD-Assisted Projects near Hazardous Operations [24 CFR 51 C]	Visual inspection of the site determined that there were no Above-Ground Storage Tanks (ASTs) visible within the line of sight of the properties.
Airport Clear Zones and Accident Potential Zones [24 CFR 51 D]	The project site is outside the Clear Zone of all airports. The nearest commercial or general aviation airport is Hilo International Airport, which is approximately two miles away.

Environmental Assessment Checklist

Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a finding of impact. Impact codes: (1) – No impact anticipated; (2) – Potentially beneficial; (3) – Potentially adverse; (4) – Requires mitigation; (5) – Requires project modification. Note names, dates of contact, telephone numbers and page references. Attach additional materials as needed.

Land Development	Code	Determinations and Documentation
Conformance with Comprehensive Plans and Zoning	1	The project is consistent with all State and local plans, including the 2005 Hawai'i County General Plan, which identifies the area for Medium Density Urban uses. County zoning for the project site is Single-Family Residential (RS-7.5) (minimum lot size 7,500 sf), where adult day care homes, meeting facilities, and public uses and structures are permitted uses, per Section 25-5-3 of the County zoning code. Plan approval by the County Planning Department is required. The property is not situated within the County's Special Management Area (SMA). (Source: Hawai'i County General Plan, 2005, LUPAG Map 9; County zoning and SMA maps).
Compatibility and Urban Impact	2	The project architecture will match that of the existing facility and the surrounding urban area and will be fully compatible.
Slope	1	Slopes are moderate and stable and will not affect construction or use.
Erosion	4	Erosion hazard is very slight on the recent lava surfaces found at the project site. As grading will occur on only 5,400 square feet, which is less than one acre, no formal grading permit is required. However, Easter Seals Hawai'i will require that the contractor implement standard soil erosion and sediment control Best Management Practices to ensure that erosion and sedimentation are minimized in conformance with County, State, and federal laws and regulations.
Soil Suitability	1	The general soil in the project area is classified as rough broken land by the U.S. Natural Resources Conservation Service. The actual substrate is pahoehoe lava with minimal soil covering. With appropriate geotechnical investigations to determine whether voids are present and mitigate if necessary, this substrate is highly suited for most construction uses. (Source: U.S NRCS Web Soil Survey: http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm).
Hazards and Nuisances including Site Safety	1	The property appears never to have been used for any modern agriculture or other uses. No conditions were observed or identified during archival searches or field inspection that have a significant potential for adverse environmental impacts on the property.
Energy Consumption	2	The proposed project will employ the following energy/sustainable design features: daylighting, passive cooling through natural ventilation with AC as backup only, solar water heaters, low-flush toilets/low water use fixtures, and compact fluorescent lighting.

Land Development	**Code**	**Determinations and Documentation**
Noise – Contribution to Community Noise Levels	1 or 4	Temporary noise impacts will occur from construction activities of the proposed project and are unavoidable. However, no adverse effects to sensitive uses are expected. All construction activities in Hawai‘i must comply with the Administrative Rules of the Department of Health, Chapter 11-46, on “Community Noise Control”, and the Department of Health will review project activities to determine if mitigation measures are warranted. Operational noise will be very minimal, given the context on a minor residential street, adjacent to a residential neighborhood, a church, and schools, should generate no adverse impacts.
Air Quality Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	4	Short-term impacts will result from construction activity, including dust and exhaust from machinery involved in the construction of the proposed subdivision. The contractor will be instructed to utilize best management practices to minimize dust impact and comply with provisions of Hawai‘i Administrative Rules, Chapter 11-60.1, “Air Pollution Control,” and Section 11-60.1-33, Fugitive Dust. 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 Environmental Protection Agency and the State Department of Health, Clean Air Branch. Long-term impacts will be secondary in nature and minor. Workers and clients drive to the facility, generating motor vehicle emissions.
Environmental Design Visual Quality – Coherence, Diversity, Compatible Use and Scale	1	The proposed use would support a social service agency in conformance with existing plans. The scale, architectural themes, etc., will be basically similar in visual and design character to that of the existing facility. Landscaping will utilize the suite of plants already present on the site. No irrigation is required.
Socioeconomic	**Code**	**Determinations and Documentation**
Demographic Character Changes	1	The expansion of the facility would not lead to any population increase, demographic changes or adverse effects to neighborhoods.
Displacement	1	The area for the expansion is vacant and no displacement will occur.
Employment and Income Patterns	1	No additional jobs or effects on employment are expected.
Educational Facilities	1	The project would have no adverse impact on educational facilities and there is the possibility that the project could assist schools through the youth services.

Community Facilities and Services	Code	Determinations and Documentation
Commercial Facilities	1	No effect to commercial facilities would occur. No commercial services are necessary for the project.
Health Care	1	The closest hospital is located at Hilo Medical Center, about one mile away. The project will not adversely affect medical facilities.
Social Services	1	The project could assist State agencies that provide services for disabled children and their families.
Waste Water	4	The site is not served by the municipal wastewater system and because of its location it cannot be easily served. The site has an individual wastewater system with sufficient capacity to treat the small amount of additional wastewater that would be generated by the expansion.
Solid Waste	1	Solid waste is handled by a cleaning service. Recycling is conducted with the very limited amount of waste generated. The contractor will develop a solid waste management plan.
Storm Water	4	Best Management Practices (BMPs) for soil erosion and sediment control shall be implemented, and drainage impacts will be minor.
Water Supply	4	The site has municipal water service with the County of Hawai‘i Department of Water Supply and is served by an existing 6-inch line and 5/8-inch meter, which is limited to an average daily usage of 400 gallons (see letter from County Dept. of Water Supply, **Exh. G**, Appendix 1a). No expansion of water service is needed.
Public Safety - Police	1	A police station is on Kapiolani St. about a mile away (**Exh. A1**).
- Fire	1	A fire station is on Ponahawai St., about half a mile away (**Exh. A1**).
- Emergency Medical	1	EMT services are provided by the Hawai‘i County Fire Department, which has a station about half a mile away (**Exh. A1**).
Open Space and Recreation - Open Space	1	Open space and views in Hilo be in no way affected by the minor expansion of the facility. No views will be blocked.
- Recreation	1	Recreational facilities are not required and will not be adversely affected. The project could assist State agencies that provide recreational services for disabled children and their families.
Transportation	1	The site is accessed by Ka‘iulani Street, a County road. Current activities generate minimal traffic that does not affect nearby roads, including State Route 200 (Waianuenue Ave.) (see **Exh. A1**). The expansion will raise traffic less than 10 percent and there will be no adverse impact. If construction of the Easter Seals addition occurs simultaneously with that of the Hilo High School gym and the renovation of Hilo Intermediate School, there is potential for cumulative construction-phase traffic impacts. The EA for the Hilo High School gym (Source: *OEQC Environmental Notice* 5/23/2010) lists extensive traffic mitigation measures that should reduce cumulative impacts to minimal levels.

Natural Features		Determinations and Documentation
Water Resources	4	Although there is a stream that is tributary to the Wailuku River not far north of the property, there are no sensitive water resources such as streams, ponds, wetlands, protected aquifers, or coastal waters on the site or in an area with a potential to be affected.
Surface Water	4	The nearest coastal waters are situated within Hilo Bay about 0.4 miles north of the project site. The proposed project is not expected to have any direct impact on any streams and no significant impact on any other waters.
Unique Natural Features and Agricultural Lands	1	No unique natural features are present. No Prime, Unique or Other Important Agricultural lands are present on the site.
Vegetation and Wildlife	4, 2	There are no threatened or endangered plant species, critical habitat, or other valuable ecosystems on the property or related to the action in such a way as to be adversely affected. However, Easter Seals Hawai‘i will specifically refrain from activities that disturb or remove vegetation taller than 15 feet during critical pupping months for the endangered Hawaiian hoary bat, between May 15 and August 15 of each year (**Exh. B**).
Other Factors		**Determinations and Documentation**
Tsunami Evacuation Zone	1	The project site is 0.4 miles from the coast at about 100 feet in elevation and is not located in the Tsunami Evacuation Zone, which terminates at Kinoole Street, 0.2 miles *makai* (downhill).
Lava Flow Hazard Zone	1	The entire Big Island is subject to geologic hazards, especially lava flows and earthquakes. Volcanic hazard as assessed by the United States Geological Survey in this area of Hilo is zone 3, on a scale of ascending risk from 9 to 1 (Heliker 1990:23). The high hazard risk is based on the fact Mauna Loa is presently an active volcano. Volcanic hazard zone 3 areas have had 1-5% of their land area covered by lava or ash flows since the year 1800, but are at lower risk than zone 2 areas because of their greater distances from recently active vents and/or because the local topography makes it less likely that flows will cover these areas. (**Exh. H**).
Seismic Risk	1	The entire island of Hawai‘i is rated Zone 4 Seismic Hazard: areas at risk from major earthquake damage, especially to structures that are poorly designed or built, as demonstrated by the earthquake of October 15, 2006, which had a 6.7 magnitude. The project site is susceptible to lava flow and seismic hazard. However, as much of the island has similar hazard levels, geologic hazards impose no particular constraints on the proposed action, and the proposed facilities are not imprudent to construct. Project design will take soil properties into account. All facilities will be built in conformance with the Uniform Building Code's seismic standards. [Source: *Uniform Building Code, 1997 Edition*, Figure 16-2]

SUMMARY OF FINDINGS AND CONCLUSIONS

There are no evident historic properties, endangered plant species, wetlands, riparian habitats, or streams, water bodies or critical aquifer systems on or near the property. Best Management Practices (BMPs) for soil erosion and sediment control shall be implemented, and drainage impacts will be minor. The site is disturbed and contains no threatened or endangered plants. Impacts to the wide-ranging endangered Hawaiian hoary bats will be prevented by refraining from activities that disturb or remove shrubs and trees taller than 15 feet during critical pupping months for the Hawaiian hoary bat, between May 15 and August 15 of each year. Archaeological monitoring will be conducted during initial ground disturbance.

No conditions were observed or identified that indicate toxic or hazardous conditions, and there are no explosive or flammable hazards. The nature and scale of the proposed action is such that no significant environmental effects are anticipated, given implementation of mitigation. Potential impacts, if any, can be mitigated through construction management practices and compliance with all governmental requirements including those of the State Department of Health and the County Planning Department. As such, a determination of a Finding of No Significant Impact for the proposed action is appropriate.

ALTERNATIVES TO THE PROPOSED ACTION

Alternatives and Project Modifications Considered

The project site easily accommodates the location of the proposed addition, and no other area of the property could be easily utilized because of access and topography. Other sites would have fragmented Easter Seals Hawai‘i’s operations and were thus not desirable. No other feasible and reasonable alternatives appear to be available.

No Action Alternative

No Action would mean that the increasing need to provide room for group activities and therapy as well as program space for new youth services for the disabled and their families could not met as effectively, providing a hardship for these individuals.

MITIGATION MEASURES RECOMMENDED

Short-term impacts will result from the proposed construction activity including the potential for increased erosion, sedimentation, noise, dust and machinery exhaust. Best management practices for construction-period impacts will be implemented by the construction contractor. The contractor will be instructed to comply with provisions of Hawai‘i Administrative Rules, Chapter 11-60.1, “Air Pollution Control,” Section 11-60.1-33, “Fugitive Dust”, and Chapter 10, “Erosion and Sedimentation Control,” of the Hawai‘i County Code. All project activities must comply with the Administrative Rules of the Department of Health, Chapter 11-46, on “Community Noise Control”. If appropriate, a Construction Noise Permit will be obtained, which will specify measures to minimize noise impacts such as the use of mufflers and implementing construction curfew periods. The contractor will be required to refraining from activities that disturb or remove shrubs and trees taller than 15 feet during critical pupping months for the Hawaiian hoary bat, between May 15 and August 15 of each year. If any lava tubes, human remains, or archaeological resources such as cultural deposits, pavings, etc. are encountered during monitoring, work in the immediate area of the discovery will be halted and SHPD contacted as outlined in Hawai‘i Administrative Rules 13§13-275-12.

Additional Studies Performed:

None

List of Sources, Agencies and Persons Consulted

The list below includes only those parties that were consulted by letter in May to June 2010 specifically as part of this EA.

Loyal Mehrhoff, Ph.D., Supervisor Pacific Island Ecoregion U.S. Fish and Wildlife Service 300 Ala Moana Boulevard, Honolulu HI 96813	Nancy McMahon, Deputy SHPO State Historic Preservation Division Hawai‘i Dept. of Land and Natural Resources 601 Kamokila Blvd., Room 555 Kapolei HI 96707
Warren H.W. Lee, P. E. Director Hawai‘i County Dept. Public Works 101 Pauahi Street, Suite 7 Hilo HI 96720	Milton Pavao, Manager Hawai‘i County DWS 345 Kekuanaoa Street, Suite 20 Hilo HI 96720
Donald Ikeda Hawai‘i County Council 25 Aupuni Street Hilo HI 96720	President Hilo Downtown Improvement Assoc. 329 Kamehameha Avenue Hilo HI 96720
Sierra Club P.O. Box 1137 Hilo HI 96721	Bobby-Jean Leithead Todd, Director Hawai‘i County Planning Department 101 Aupuni Street, Suite 3 Hilo HI 96720
Lukella Ruddle Office of Hawaiian Affairs 162 A Baker Avenue Hilo HI 96720-4869	Clyde Nāmu‘o, Administrator Office of Hawaiian Affairs 711 Kapiolani Blvd., Suite 1250 Honolulu HI 96813
Mary Begier, President Hawai‘i Island Chamber of Commerce 106 Kamehameha Avenue Hilo HI 96720	EPO Manager Hawai‘i State Dept. of Health P.O. Box 3378 Honolulu HI 96801-3378
Hawai‘i Department of Education P.O. Box 2360 Honolulu HI 96804	Moriuchi, Karen A 48 Ka‘iulani St Hilo HI 96720
Yamamoto, Morito Trust 415 Wailuku Drive Hilo HI 96720	Hilo United Methodist Church 374 Waianuenue Ave Hilo HI 96720

Exhibit A1
Location Map and Airphoto

Exhibit A2
TMK Map

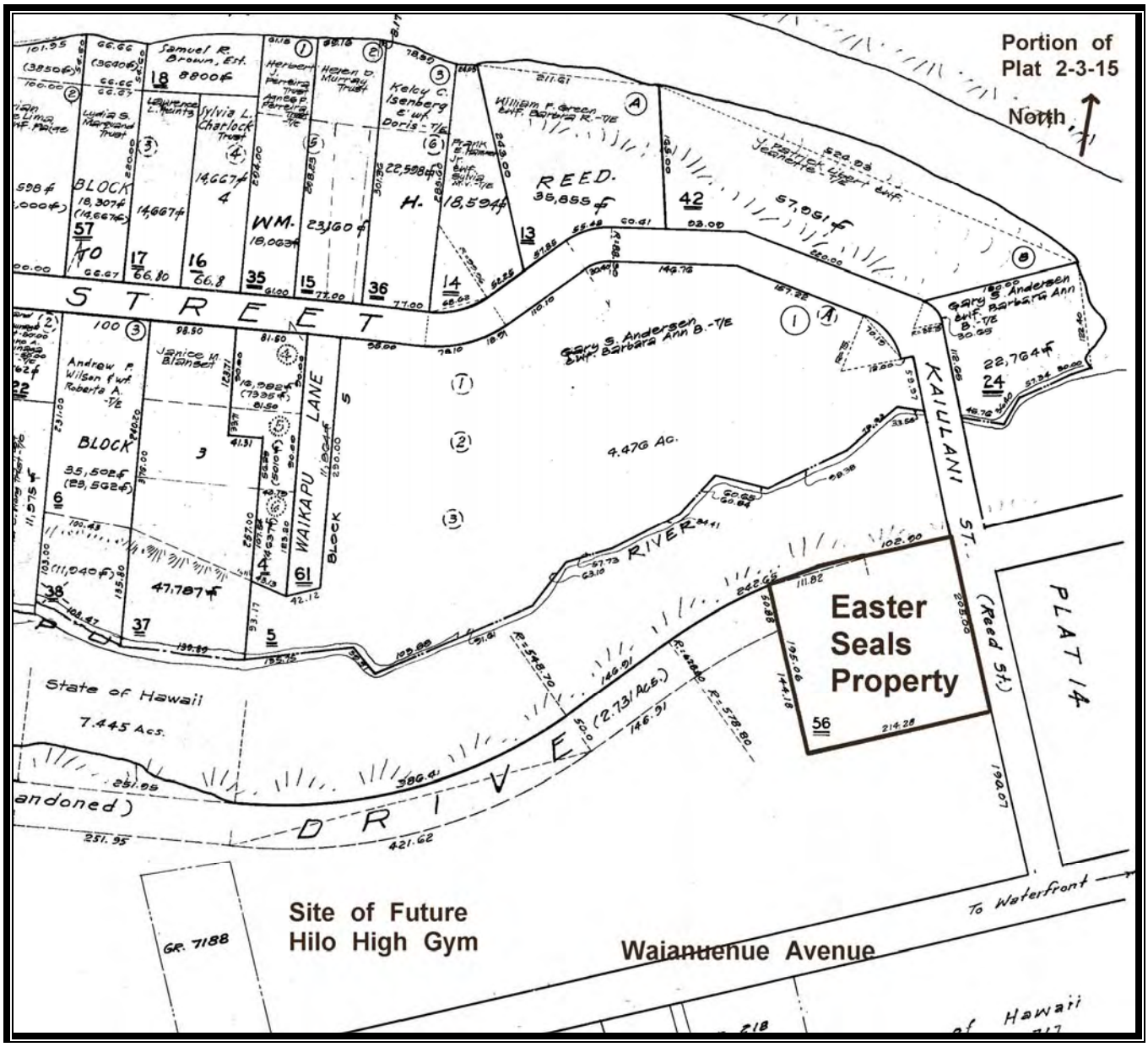

Exhibit A3 Site Plan

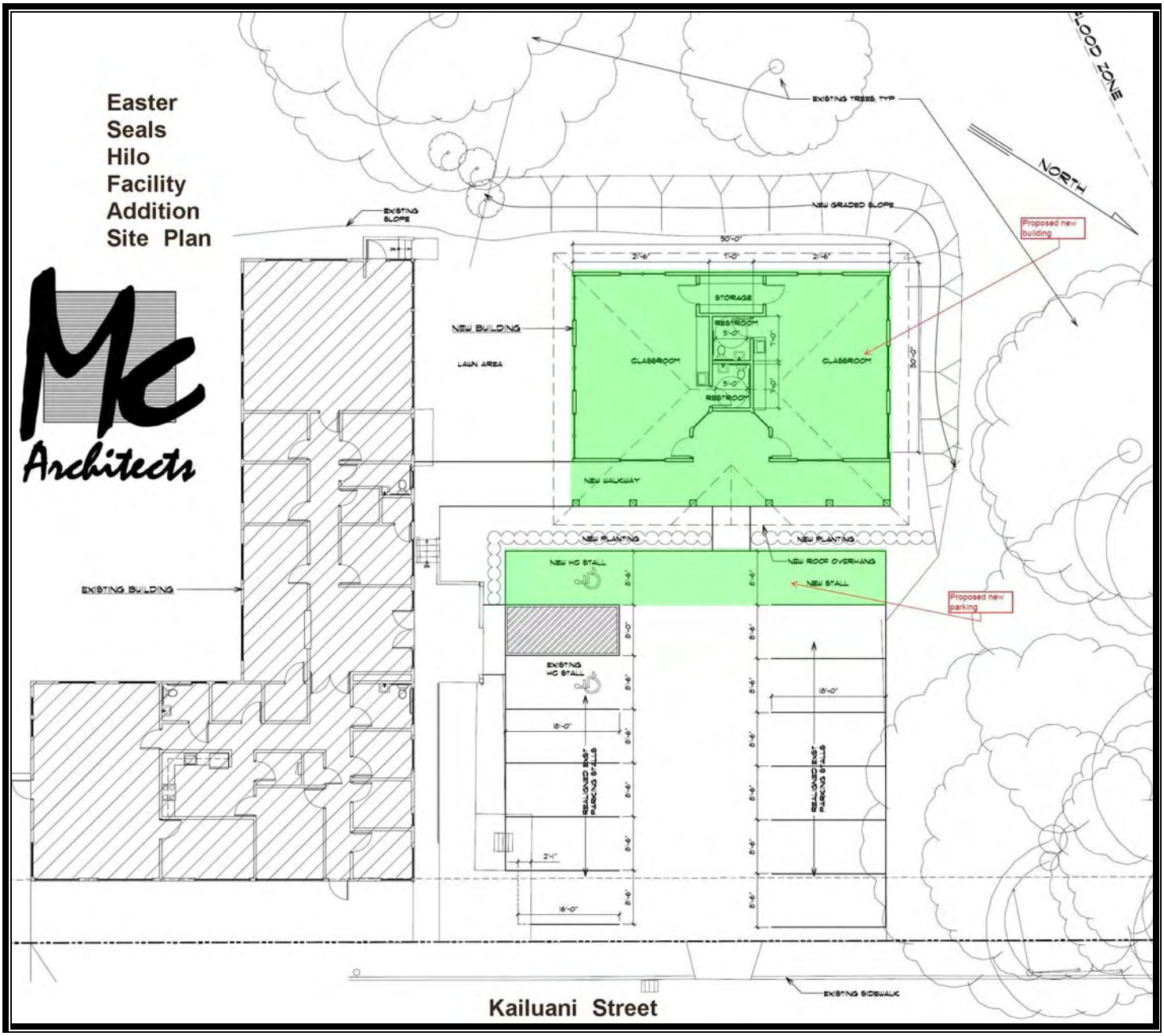

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Exhibit B
Endangered Species Act Correspondence

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geometrician
ASSOCIATES, LLC
integrating geographic science and planning

phone: (808) 969-7090 fax: (866) 316-6988 PO Box 396 Hilo Hawaii 96721
rterry@hawaii.rr.com

June 29, 2010

Loyal Mehrhoff, Ph.D., Supervisor
Pacific Island Ecoregion
U.S. Fish and Wildlife Service
300 Ala Moana Boulevard
Honolulu HI 96813

Dear Mr. Mehrhoff:

Subject: Early Consultation for Environmental Assessment and Request for USFWS Technical Assistance for Easter Seals Hilo Facility Addition, TMK (3rd.) 2-3-015:056, Hilo, Island of Hawai'i

My firm is preparing an Environmental Assessment (EA) for a proposed action involving State of Hawai'i land and U.S. Department of Housing and Urban Development (HUD) funds. The EA will comply with Chapter 343, Hawai'i Revised Statutes, the National Environmental Policy Act (NEPA), and the implementing regulations of HUD for NEPA, at 24 CFR Part 58.

Easter Seals Hawai'i provides exceptional services to ensure that all people with disabilities or special needs and their families have equal opportunities to live, learn, work and play in their communities. The organization has been serving special needs children, youth and adults for 64 years, providing more than 450,000 hours of direct service annually to individuals and families across the State.

Easter Seals Hawai'i plans to expand and improve its facility in Hilo, which is situated on a 1.0-acre property leased from the State of Hawai'i on Kaiulani Street (see attached USGS map, preliminary site plan, airphoto, and ground photos). The project will add 1,500 square feet of new interior space and seven new parking stalls, and it will also involve minor interior renovation and roof replacement at the existing building. No substantial new services are involved, but rather an expansion of existing services. Easter Seals Hawai'i now helps about three times as many children as in the year 2000. The downturn in the national economy has produced severe budget cuts, to which the organization has responded by returning to a focus on delivering services at its service center. With more children coming to the center, there is increasing need to provide room for group activities and therapy as well as program space for youth services.

The areas of investigation in the Environmental Assessment will include but not be limited to the following: water quality; wastewater treatment; flora, fauna, and ecosystems; traffic impacts; geology, soils, and hazards; flooding and drainage impacts; social, cultural and community impacts; impacts to neighboring businesses and economic impacts; cultural impacts; and historic sites.

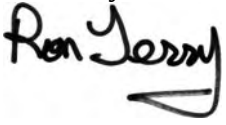
The existing and planned Easter Seals facilities take up only about half of the 1-acre site, as shown on the preliminary site plan and airphoto. As illustrated in the photographs, the area planned for new work (which totals only about 5,400 square feet) appears to have been largely disturbed in the past through construction of the parking lot and other grading. This area has been landscaped with palms, various small trees, crotons, bananas, and ginger. Managed periodically through herbicide and chopping, when untended it becomes covered with low plants such as pothos vine, firespike, and tree seedlings. The entire area of future work was recently cleared of groundcover, with shrubs and trees left standing. I inspected this area and found all plant species within and directly adjacent to the area planned for the new facility to be non-native plants, as detailed in the table below and illustrated in the attached photos. Although there is a stream that is tributary to the Wailuku River not far north of the property, no streams, ponds, wetlands, native forest groves or other important habitat areas would be affected.

It is recognized that listed terrestrial vertebrates may be present in this part of Hilo and may overfly, roost, nest, or utilize resources here, including the endangered Hawaiian Hawk (*Buteo solitarius*), the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), the endangered Hawaiian Petrel (*Pterodroma sandwichensis*), and the threatened Newell's Shearwater (*Puffinus auricularis newelli*). No temporary or permanent lighting or erect structures such as poles are planned, and therefore we do not anticipate any impacts to listed seabirds. No removal of large trees will be necessary, and as the Easter Seals Hilo center is within an urban area with frequent lawn mowing, tree trimming, school activities, and other uses, it would appear that there is very little potential for Hawaiian Hawks to be present at the site or to be disturbed by the construction if nesting nearby.

We recognize that there is at least some chance that Hawaiian hoary bats may roost within some of the tall shrubs and low (10-20 foot tall) trees that will be removed or trimmed. *If your agency determines that it is advisable*, the project proponents are willing to commit to measures in order to avoid impacts to the bat. Easter Seals Hawai‘i will specifically refrain from activities that disturb or remove the vegetation during critical pupping months for the Hawaiian hoary bat, which we understand to be May 15 to August 15 of each year.

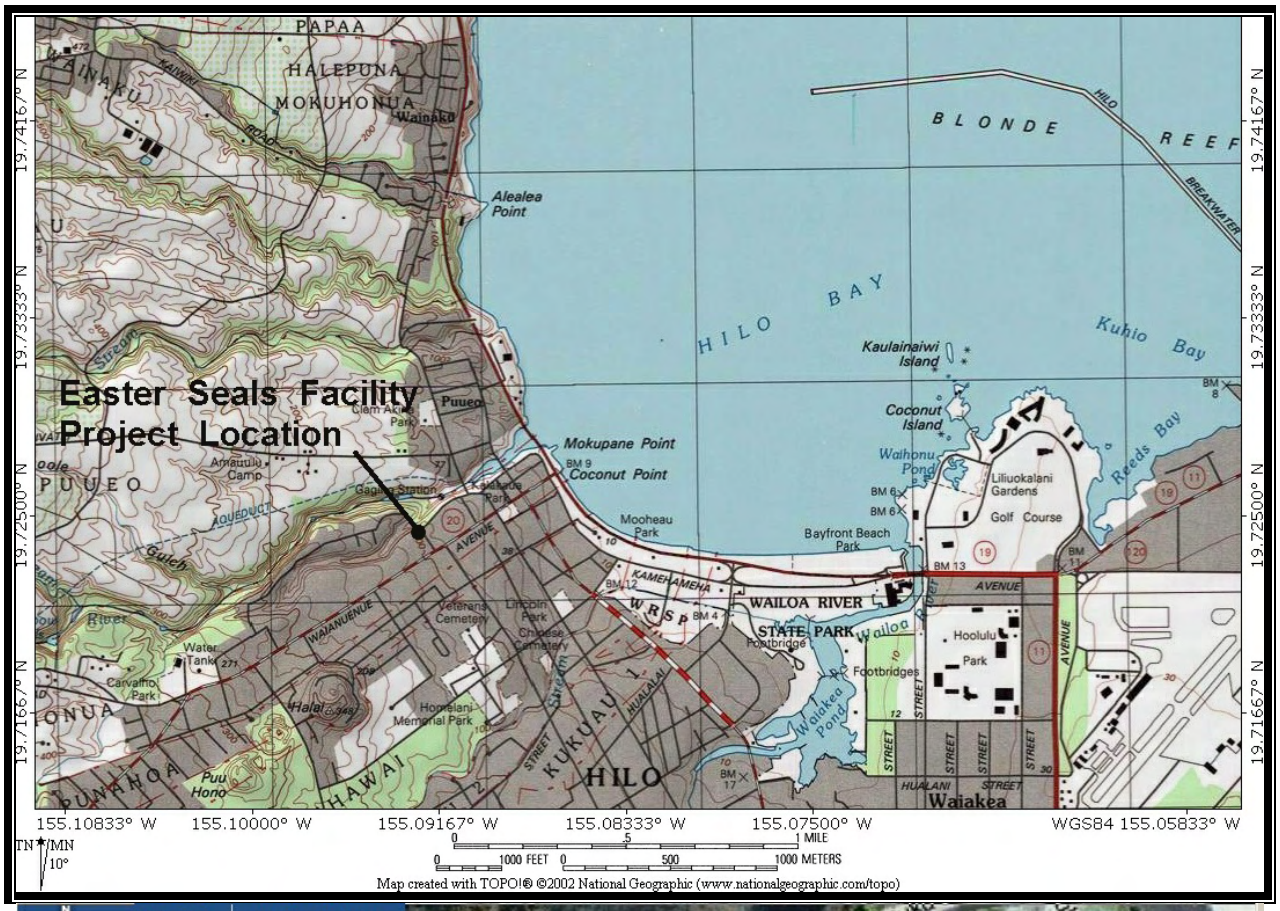
We would appreciate your comments on the information we have provided and input regarding any special environmental conditions or impacts related to the project, including a list of any threatened or endangered species or critical habitat that might be present and any further recommendations on mitigating for impacts. Please contact me at 969-7090 if you have any questions or require clarification. Kindly indicate whether you wish to receive an EA when it is completed.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Attach: Map; photos; species list table
Cc: John Howell and Steve Marlette, Easter Seals Hawai‘i


Easter Seals Facility
Project Location
PAPAA
HALEPUNA
MOKUHONUA
WAINAKU
Alealea Point
BLONDE REEF
HILO BAY
Kaulainaiwi Island
Kuhio Bay
Coconut Island
Mokupane Point
Coconut Point
Mooheau Park
Bayfront Beach Park
Liliuokalani Gardens
Golf Course
Waiuli Pond
Reeds Bay
WAILOA RIVER
STATE PARK
Footbridges
Hoolulu Park
Waiakea Pond
PUUEO
KUKUAU
HILO
HAWAI
PUNAHOA
Puu Hono
Waiakea
19.74167° N
19.73333° N
19.72500° N
19.71667° N
155.10833° W
155.10000° W
155.09167° W
155.08333° W
155.07500° W
WGS84 155.05833° W
1 MILE
1000 FEET
1000 METERS
Map created with TOPO!® ©2002 National Geographic (www.nationalgeographic.com/topo)


2D 3D
Road Aerial
Wailuku Dr
Kaiulani St
Ululani St
Area of Existing and Planned Facilities
Easter Seals Property
Waianuenue Ave
200
Kapiolani St
Microsoft Virtual Earth
80 yrds
© 2010 Microsoft Corporation © 2010 NAVTEQ © AND © 2010 DigitalGlobe

Table 1: Easter Seals Hawai‘i Hilo Project Site Species List

Scientific Name	Family	Common Name	Life Form	Status*
DICOTS				
Justicia betonica	Acanthaceae	Shrimp Plant	Shrub	A
Odontostema cuspidatum	Acanthaceae	Firespike	Shrub	A
Mangifera indica	Anacardiaceae	Mango	Tree	A
Ageratum conyzoides	Asteraceae	Ageratum	Herb	A
Crassocephalum crepidioides	Asteraceae	Crassocephalum	Herb	A
Chamaesyce hirta	Euphorbiaceae	Spurge	Herb	A
Codiaeum variegatum	Euphorbiaceae	Croton	Shrub	A
Falcataria moluccana	Fabaceae	Albizia	Tree	A
Desmodium incanum	Fabaceae	Spanish Clover	Herb	A
Persea americana	Lauraceae	Avocado	Tree	A
Psidium guajava	Myrtaceae	Guava	Tree	A
Syzygium jambos	Myrtaceae	Rose Apple	Tree	A
Paederia scandens	Rubiaceae	Maile Pilau	Vine	A
Chrysophyllum oliviforme	Sapotaceae	Satin leaf	Tree	A
Clerodendrum chinense	Verbenaceae	Pikake honohono	Tree	A
MONOCOTS				
Cordyline fruticosa	Agavaceae	Ti	Shrub	A
Epipremnum pinnatum	Araceae	Pothos	Vine	A
Philodendron sp.	Araceae	Philodendrom	Shrub/Vine	A
Scindapsus aureus	Araceae	Taro Vine	Vine	A
Archontophoenix alexandrae	Arecaceae	Alexandra	Palm	A
Commelina diffusa	Commelinaceae	Honohono	Herb	A
Dracaena fragrans	Agavaceae	Massangeana	Shrub	A
Dracaena marginata	Agavaceae	Money Tree	Shrub	A
Heliconia spp	Musaceae	Heliconia	Herb	A
Musa sp.	Musaceae	Banana	Shrub	A
Setaria palmifolia	Poaceae	Palmgrass	Herb	A
Etlingera elatior	Zingiberaceae	Torch ginger	Shrub	A
NON-FLOWERING PLANTS				
Cycas revoluta	Cycadaceae	Sago palm	Shrub	A

A = alien, E = endemic, I = indigenous, End = Federal and State listed Endangered Species

View from northwest corner of area of future construction looking southeast to edge of existing structure; ground clearing extends just beyond area of future construction;

View from northwest corner of area of future construction looking east; ground clearing extends just beyond area of future construction;

View from northwest corner of area of future construction looking northeast back to road; ground clearing extends just beyond area of future construction;

United States Department of the Interior

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

In Reply Refer To:
2010-TA-0379

JUL 29 2010

Ron Terry, Ph.D.
Geometrician Associates, LLC
P.O. Box 396
Hilo, Hawaii 96721

Subject: Early Consultation for an Environmental Assessment for the Proposed Easter Seals Hilo Addition, Hawaii

Dear Dr. Terry:

Thank you for your letter dated June 29, 2010, which we received on July 1, 2010, requesting information for your use in the preparation of an Environmental Assessment (EA) for the proposed Easter Seals Hilo Addition project. Easter Seals Hawaii plans to expand and improve its facility which is located on a 1.0-acre property [TMK: (3rd.) 2-3-015:056] leased from the State of Hawaii in Hilo, on the island of Hawaii. The proposed project includes developing 1,500 square feet of new interior space and seven new parking stalls and repairing the interior and replacing the roof of an existing building.

We have reviewed the project information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program and the Hawaii GAP Program. The threatened Newell's shearwater (*Puffinus auricularis newelli*) and endangered Hawaiian petrel (*Pterodroma phaeopygia sandwichensis*) (collectively referred to as seabirds) are known to traverse the project site. Additionally, the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) and Hawaiian hawk (*Buteo solitarius*) occur in the project vicinity.

In your letter you indicate that because the project site is in an urban area and because no lighting or erect structures will be installed, you do not anticipate any impacts to seabirds or the Hawaiian hawk. We agree the risks of adverse project impacts to these species are low. To minimize potential project impacts to the Hawaiian hoary bat, woody plants greater than 15-feet tall should not be removed or trimmed during the bat birthing and pup rearing season (April 15 through August 15).

Hawaii's native ecosystems are heavily impacted by exotic invasive plants. We recommend you use native plants for landscaping purposes whenever possible. If native plants do not meet the landscaping objectives, we recommend you chose species that are thought to have a low risk of becoming invasive. The following websites are good resources to use when choosing landscaping

plants: Pacific Island Ecosystems at Risk (http://www.hear.org/Pier/), Hawaii-Pacific Weed Risk Assessment (http://www.botany.hawaii.edu/faculty/daehler/wra/full_table.asp) and Global Compendium of Weeds (www.hear.org/gcw).

Thank you for the opportunity to provide comments related to your EA. If you have any questions regarding this letter, please contact Dr. Jeff Zimpfer, Fish and Wildlife Biologist, Consultation and Habitat Conservation Planning Program (phone: 808-792-9431; email: jeff_zimpfer@fws.gov).

Sincerely,

for Loyal Mehrhoff
Field Supervisor

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Exhibit C – Wild and Scenic Rivers

Portions of: http://www.rivers.gov/wildriverslist.html

Designated Wild & Scenic Rivers

Select State Go

Rivers that pass through several states may have segments in each state designated. For example, the Klamath River has designations in California and Oregon. Many rivers also have numerous tributaries designated (e.g., Washington's Skagit River). Multiple listings of some rivers indicate more than one segment of the river is designated (e.g., the Missouri River in Nebraska).

LISTING OF STATES: Note: State of Hawai‘i not listed.

Georgia

- Chattooga River (See also North Carolina, South Carolina — U.S. Forest Service Site, Chattooga Net

Top of the Page

Idaho

- Clearwater River (Middle Fork)
- Rapid River
- Saint Joe River
- Salmon River
- Salmon River (Middle Fork)
- Snake River (See also Oregon)

Top of the Page

Illinois

- Vermilion River — State of Illinois Site

Top of the Page

Exhibit D

ADAPTED FROM: http://www.epa.gov/oar/oaqps/greenbk/astate.html

Green Book

Select a State

ALABAMA	MONTANA
ALASKA	NEVADA
ARIZONA	NEW HAMPSHIRE
ARKANSAS	NEW JERSEY
CALIFORNIA	NEW MEXICO
COLORADO	NEW YORK
CONNECTICUT	NORTH CAROLINA
DELAWARE	OHIO
DISTRICT OF COLUMBIA	OREGON
GEORGIA	PENNSYLVANIA
GUAM	PUERTO RICO
IDAHO	RHODE ISLAND
ILLINOIS	SOUTH CAROLINA
INDIANA	TENNESSEE
KENTUCKY	TEXAS
LOUISIANA	UTAH
MARYLAND	VIRGINIA
MASSACHUSETTS	WEST VIRGINIA
MICHIGAN	WISCONSIN
MISSOURI	WYOMING

NOTE: State of Hawai‘i Not Listed.

Exhibit E
Correspondence with State Historic Preservation Division

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geometrician
ASSOCIATES, LLC
integrating geographic science and planning

phone: (808) 969-7090 fax: (866) 316-6988 PO Box 396 Hilo Hawaii 96721
rterry@hawaii.rr.com

June 29, 2010

Nancy McMahon, Deputy SHPO
Kākuhihewa Building, Room 555
601 Kamokila Blvd
Kapolei, HI 96707

Dear Ms. McMahon:

Subject: Early Consultation for Environmental Assessment for Easter Seals Hilo Facility Addition, TMK (3rd.) 2-3-015:056, Hilo, Island of Hawai‘i

My firm is preparing an Environmental Assessment (EA) for a proposed action involving State of Hawai‘i land and U.S. Department of Housing and Urban Development (HUD) funds. The EA will comply with Chapter 343, Hawai‘i Revised Statutes, the National Environmental Policy Act (NEPA), and the implementing regulations of HUD for NEPA, at 24 CFR Part 58.

Easter Seals Hawai’i provides exceptional services to ensure that all people with disabilities or special needs and their families have equal opportunities to live, learn, work and play in their communities. The organization has been serving special needs children, youth and adults for 64 years, providing more than 450,000 hours of direct service annually to individuals and families across the State.

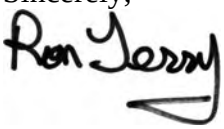
Easter Seals Hawai‘i plans to expand and improve its facility in Hilo, which is situated on a 1.0-acre property leased from the State of Hawai‘i on Kaiulani Street (see attached USGS map, preliminary site plan, airphoto, and ground photos). The project will add 1,500 square feet of new interior space and seven new parking stalls, and it will also involve minor interior renovation and roof replacement at the existing building. No substantial new services are involved, but rather an expansion of existing services. Easter Seals Hawai‘i now helps about three times as many children as in the year 2000. The downturn in the national economy has produced severe budget cuts, to which the organization has responded by returning to a focus on delivering services at its service center. With more children coming to the center, there is increasing need to provide room for group activities and therapy as well as program space for youth services.

The existing and planned Easter Seals facilities take up only about half of the 1-acre site, as shown on the preliminary site plan and airphoto. As illustrated in the photographs, the area

planned for new work (which totals only about 5,400 square feet) appears to have been largely disturbed in the past through construction of the parking lot and other grading. This area has been landscaped with palms, various small trees, crotons, bananas, and ginger, but when untended becomes covered with low plants such as pothos vine, firespike, and tree seedlings. The entire area of future work was recently cleared of groundcover and I was able to inspect it. I found no rock alignments, pavings, terraces, pits, or other features that might potentially be historic properties. The area had scattered broken rocks, scraped pahoehoe, and push-piles of soil that indicated one or more episodes of grubbing and light grading. There were about half a dozen pieces of concrete, including one block that may have been part of a floor, but these were scattered and had no integrity, and appeared to have been pushed to their current locations. There were no lava tube openings visible on or near this area.

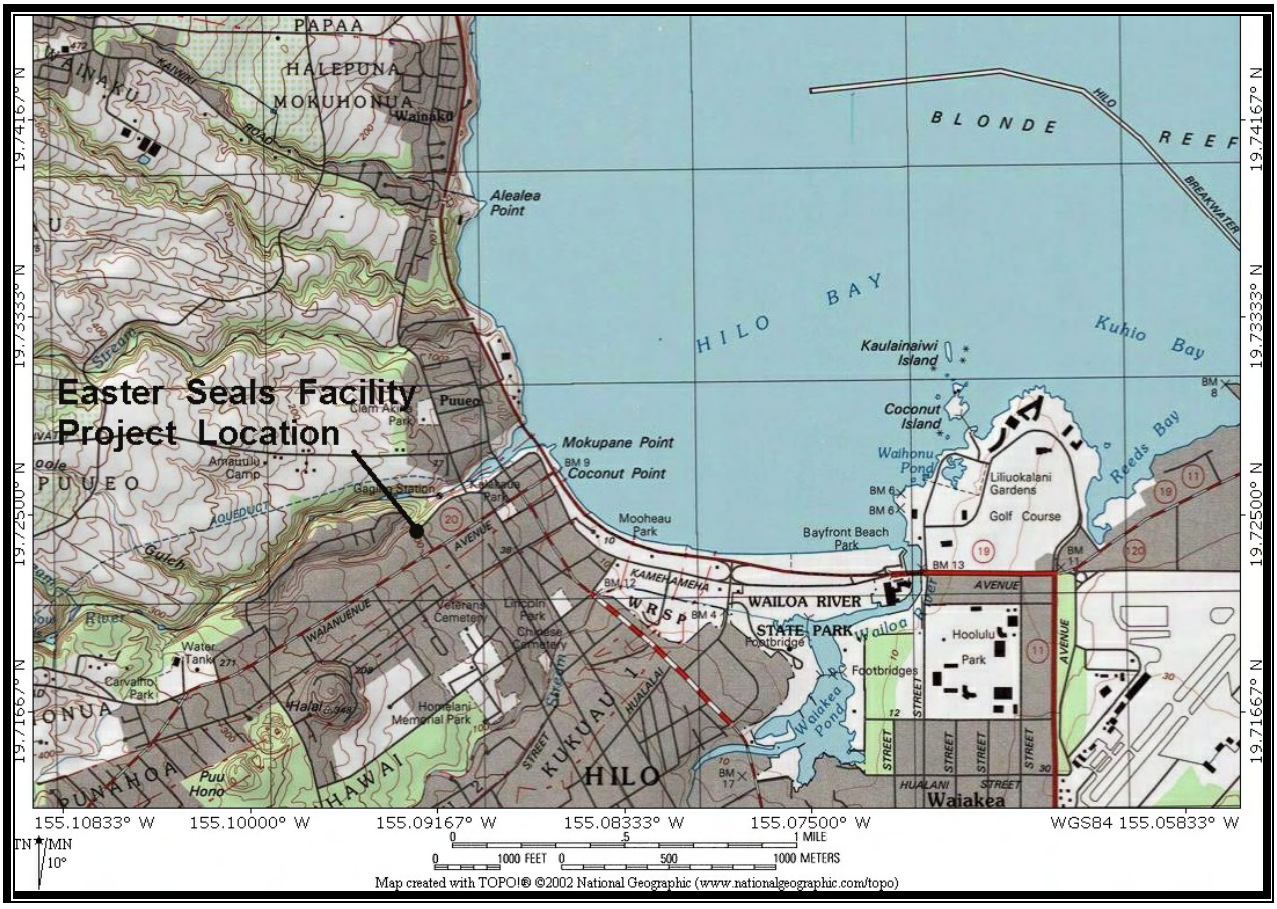
We seek your concurrence that based on the limited area of disturbance and the apparent lack of archaeological features, the project would not affect historic properties or, if you are unable to make that determination based on the information provided, your recommendation on additional information or reports needed to assess the project's effect on historic properties. The construction contracts will contain the requirement that if archaeological resources or human remains are unexpectedly encountered, work in the immediate area of the discovery will be halted and SHPD will be contacted. We would be happy to provide any other additional information and/or accompany your personnel on an inspection of the site. Please contact me at 969-7090 if you have any questions or require clarification. Also, kindly indicate whether you wish to receive an EA when it is completed.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Attach: Map; photos;
Cc: John Howell and Steve Marlette, Easter Seals Hawai‘i


Easter Seals Facility
Project Location
PAPAA
HALEPUNA
MOKUHONUA
Waiakō
Alealea Point
BLONDE REEF
HILO BAY
Kaulainaiwi Island
Kuhio Bay
Coconut Island
Mokupane Point
Coconut Point
PUUEO
Puueo
Mooheau Park
Bayfront Beach Park
Liliuokalani Gardens
Golf Course
Waiohonu Pond
Reeds Bay
WAILOA RIVER STATE PARK
Footbridges
Hoolulu Park
Waiakea
HILO
KUKUAU
PUNAHOA
Puu Hono
Halai
Hoolaulani Memorial Park
Carvalho Park
Water Tank
Veterans Cemetery
Lincoln Park
Chinese Cemetery
Waiakea Pond
BREAKWATER
HILO
AVENUE
STREET
HUALANI
WAIANUENUE
AQUEDUCT
Gulch
River
Stream
19.74167° N
19.73333° N
19.72500° N
19.71667° N
155.10833° W
155.10000° W
155.09167° W
155.08333° W
155.07500° W
WGS84 155.05833° W
1 MILE
1000 FEET
500
1000 METERS
Map created with TOPO!® ©2002 National Geographic (www.nationalgeographic.com/topo)


2D 3D
Road Aerial
Wailuku Dr
Kaiulani St
Ululani St
Area of Existing and Planned Facilities
Easter Seals Property
Waianuenue Ave
200
Kapiolani St
Microsoft Virtual Earth
© 2010 Microsoft Corporation © 2010 NAVTEQ © AND © 2010 DigitalGlobe

View from northwest corner of area of future construction looking southeast to edge of existing structure; ground clearing extends just beyond area of future construction; note upturned concrete floor

View from northwest corner of area of future construction looking east; ground clearing extends just beyond area of future construction;

View from northwest corner of area of future construction looking northeast back to road; ground clearing extends just beyond area of future construction;

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

August 5, 2010

Mr. Ron Terry
Geometrician Associates
P. O. Box 396
Hilo, Hawaii 96721
(rterry@hawaii.rr.com)

LOG NO: 2010.2670
DOC NO: 1008TD08
Archaeology

Dear Mr. Terry:

Subject: **Chapter 6E-8 and National Historic Preservation Act Section 106 Consultation – Notice of Preparation, Draft Environmental Assessment for Easter Seals Facility Pi'ihonua Ahupua'a, South Hilo District, Island of Hawai'i TMK: (3) 2-3-015: 056**

Thank you for notifying us of this proposed project, which includes improvements at the Hilo Easter Seals Society facility on Kaiulani Street in Hilo. The proposed work includes expansion of the paved parking area and a new 1500 square foot building with an adjacent covered play area. The improvements are being funded by the U.S. Department of Housing and Urban Development (HUD).

We have no records of previous archaeological work within the subject 1.0-acre State-owned parcel. A reconnaissance survey was conducted of the adjacent parcel to the south and west (Parcel 1) by PHRI in 1988. At that time, no surface evidence of historic properties was located; however, subsurface testing was recommended due to the location of the property in the context of historic Hilo and adjacent to Waikapu River. Testing was not conducted as the property was not selected for development (M. Rosendahl 1988).

Photos and text provided in your letter dated June 29, 2010 indicate that the proposed expansion area has "scattered broken rocks, push piles of soil and scraped pahoehoe". A brief site visit was conducted by SHPD staff archaeologist Theresa K. Donham on August 4, 2010. It appears that a portion of the expansion area has little to no soil and other areas could have undisturbed soil deposits beneath the disturbed surface deposits.

At this time we cannot make a determination regarding the effect of the project on historic properties. We recommend that additional investigation occur within the proposed expansion area, due to the potential for undisturbed subsurface cultural deposits and features, and the potential for lava tube caves within the area a raised pahoehoe. Please contact our office for assistance in developing an appropriate scope of work for further investigation of this area. If you have any questions at this time, please contact Theresa Donham at (808) 933-7653.

Aloha,

Theresa K. Donham, Acting Branch Cheif
Historic Preservation Division

geometrician
ASSOCIATES, LLC
integrating geographic science and planning

phone: (808) 969-7090 fax: (866) 316-6988 PO Box 396 Hilo Hawaii 96721
rterry@hawaii.rr.com

August 6, 2010

Theresa Donham
Acting Archaeology Branch Chief
Kākuhihewa Building, Room 555
601 Kamokila Blvd
Kapolei, HI 96707
Via email: Theresa.K.Donham@hawaii.gov

Dear Ms. Donham:

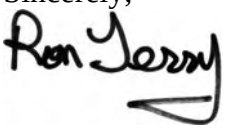
Subject: **Chapter 6E-8 and National Historic Preservation Act Consultation/Early Consultation for Environmental Assessment for Easter Seals Hilo Facility Addition, TMK (3rd.) 2-3-015:056, Hilo, Island of Hawai'i. Log No. 2010.2670. Doc. No. 1008TD08, Archaeology.**

Thank you for your response of August 5, 2010, to my letter regarding the Easter Seals project, and the subsequent recommendations you made in our phone call of the same day. We appreciate your field evaluation and your determination that effects to historic properties could not yet be determined. In conformance with your recommendations, we will be preparing an archaeological monitoring plan for your approval prior to construction, and Easter Seals Hawai'i will retain an archaeologist during the ground disturbance phase of the construction, including utility connections.

We will include this information in the EA, along with the specific mitigation that if any lava tubes, human remains, or archaeological resources such as cultural deposits, pavings, etc. are encountered during monitoring, work in the immediate area of the discovery will be halted and SHPD contacted as outlined in Hawai'i Administrative Rules 13§13-275-12.

Please contact me at 969-7090 if you have any questions or require clarification, and again, we very much appreciate your assistance in the project.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: John Howell and Steve Marlette, Easter Seals Hawai'i

EXHIBIT F

United States Environmental Protection Agency | Region 9 Ground Water Office (WTR-9) | JUNE 2000

Sole Source Aquifer Designations in EPA, Region 9

The U.S. EPA's Sole Source Aquifer Program was established under Section 1424(e) of the U.S. Safe Drinking Water Act (SDWA.) Since 1977, it has been used by communities to help prevent contamination of groundwater from federally-funded projects. It has increased public awareness of the vulnerability of groundwater resources.

How did this program start? SDWA regulations implementing the sole source aquifer statute were first proposed in 1977 for the Edwards Underground Reservoir in San Antonio, Texas. These regulations guided U.S. EPA in the subsequent designation of 64 sole source aquifers across the United States.

What does the Sole Source Aquifer Program do? The Sole Source Aquifer program allows for EPA environmental review of any project which is financially assisted by federal grants or federal loan guarantees. These projects are evaluated to determine whether they have the potential to contaminate a sole source aquifer. If there is such a potential, the project should be modified to reduce or eliminate the risk, or federal financial support may be withdrawn. This doesn't mean that the Sole Source Aquifer program can delay or stop development of landfills, roads, publicly owned wastewater treatment works or other facilities. Nor can it impact any direct federal environmental regulatory or remedial programs, such as permit decisions.

The Sole Source Aquifer Program's review authority extends only to projects funded with **federal assistance** that are to be implemented in designated sole source aquifer areas. (For regulations applicable to new private development, you should consult with your local, county or state environmental health agency.)

Typical projects reviewed by the U.S. EPA include housing projects undertaken by Housing and Urban Development, and highway construction and expansion projects undertaken by the Federal Highway Administration. In 1991, the U.S. EPA reviewed 152 federal assistance projects totaling $571 million; of these projects, 25 had to be modified to prevent contamination of sole source aquifers. Modifications included the redesign of bridges and highways to prevent spills of hazardous materials.

How do you designate an aquifer as a "Sole Source" Aquifer? As the name implies, only a "sole source" aquifer can qualify for the program. To be a sole source, the aquifer must supply more than 50% of a community's drinking water. Any individual, corporation, association, or federal, state or local agency may petition the U.S. EPA for sole source aquifer designation, provided the petition includes sufficient hydrogeologic information. An outline describing how such petitions should be prepared is contained in *The Sole Source Aquifer Designation Petitioner Guidance*, copies of which are available at EPA Regional offices (see contact information below.)

What about Boundaries? Determination of sole source aquifer boundaries is a difficult aspect of the designation process since the "designated area includes the surface area above the aquifer and its recharge area." Thus, some sole source aquifers extend across state boundaries. The 10,000 square-mile Eastern Snake River Aquifer, for example, includes portions of Idaho, Nevada, Utah, and Wyoming.

In Region 9: nine sole source aquifers have been designated in the following areas as shown on the map: Upper Santa Cruz and Avra Basin Aquifer, covering parts of Pima, Pinal, and Santa Cruz Counties, Arizona; Naco-Bisbee Aquifer, Arizona; Ocotillo-Coyote Wells, Imperial County, California; Fresno Aquifer, California; Scotts Valley Aquifer, Santa Cruz County, California; Campo-Cottonwood Aquifer, San Diego County, California; Northern Guam Aquifer, Guam; Southern Oahu Aquifer, Hawaii; and Molokai Aquifer, Hawaii.

Region 9 SSA maps are on the web at www.epa.gov/safewater/ssanp.html. For more information about SSA designation and project reviews, please call David Albright, manager of the Ground Water Office, at (415) 972-3971 or email albright.david@epa.gov.

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Exhibit G
State of Hawaii Environmental Assessment
[provided under separate cover]

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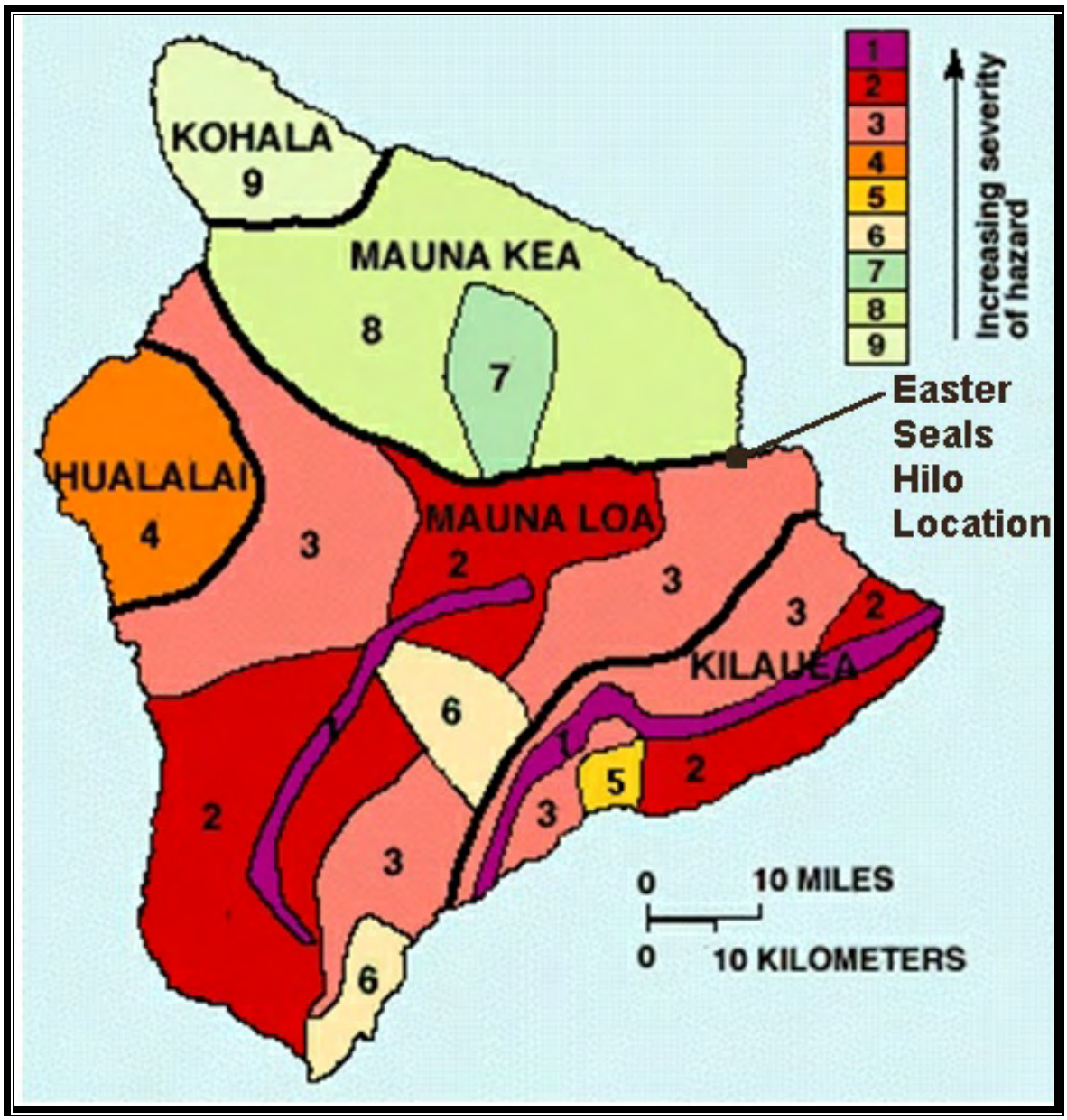
Exhibit H
Lava Hazard Zones, Island of Hawai‘i



Source: USGS, Hawaiian Volcanoes Observatory: http://hvo.wr.usgs.gov/hazards/lavazones/

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Exhibit I
Hawai‘i CZM Consistency Material

LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
STEVE BRETSCHNEIDER
DEPUTY DIRECTOR
MARY LOU KOBAYASHI
ADMINISTRATOR
OFFICE OF PLANNING

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824

Ref. No. P-10520

June 24, 2004

Mr. Gordan Y. Furutani, Field Office Director
U.S. Department of Housing and Urban Development
Hawaii State Field Office
500 Ala Moana Boulevard, Suite 3A
Honolulu, Hawaii 96813

Dear Mr. Furutani:

Subject: Hawaii Coastal Zone Management (CZM) Program Federal Consistency Requirements for U.S. Department of Housing and Urban Development (HUD) Grant Programs

We have recently revised the Hawaii CZM Program list of federal assistance programs that require CZM federal consistency review by our office. We no longer review any HUD assistance programs, including Community Development Block Grants, and housing programs such as the Public Housing Capital Fund. Applicants for HUD assistance are no longer required to obtain CZM federal consistency approval for HUD assisted activities. Other CZM regulations such as the Special Management Area and Shoreline Setback provisions which are administered by the Counties, are still valid and may apply to HUD assisted projects. Each County Planning Department should be consulted for the applicability of Special Management Area and Shoreline Setback Area requirements. We suggest that the environmental checklist that applicants for HUD assistance must complete be modified to reflect the change in CZM requirements.

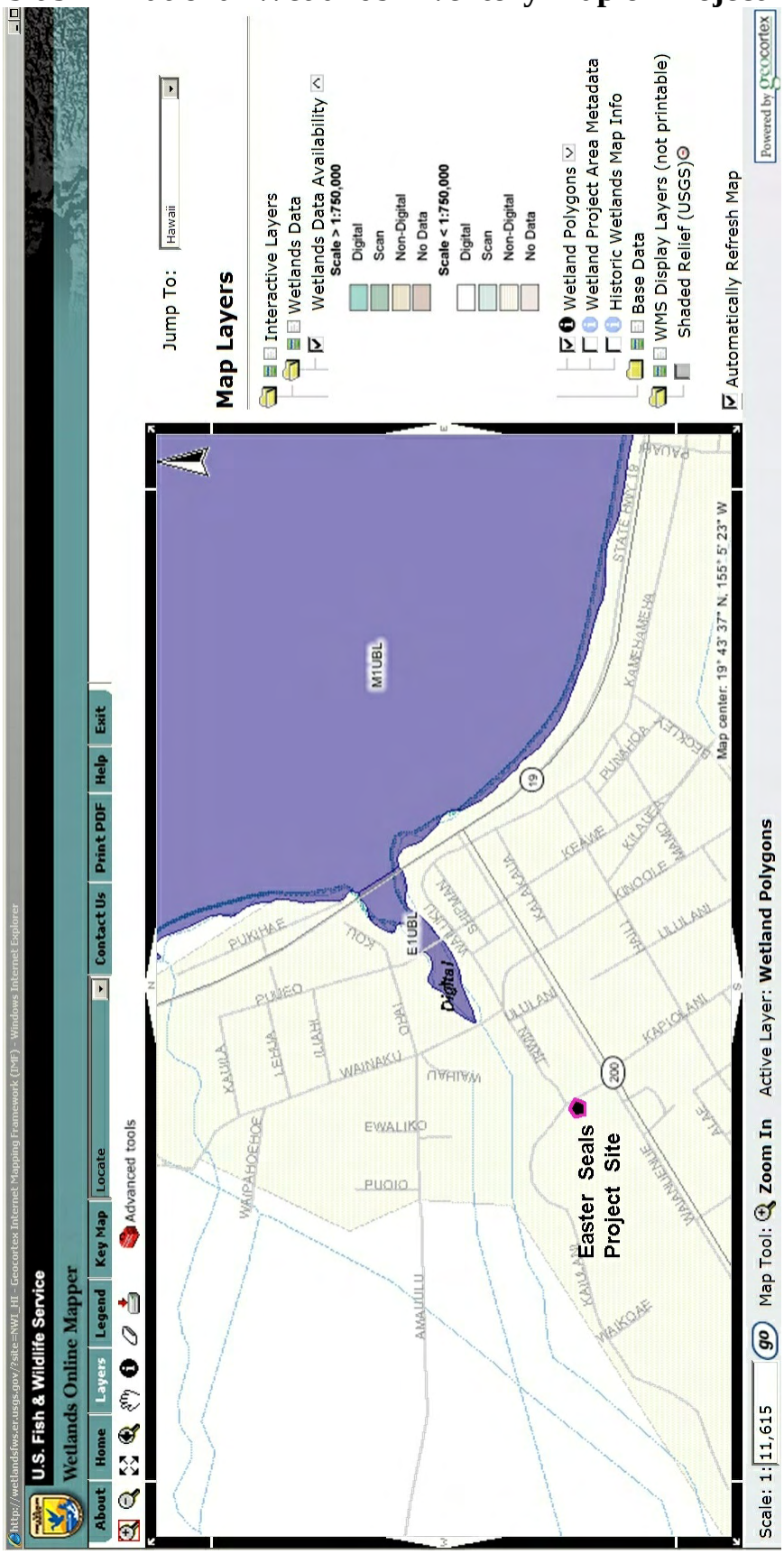
Thank you for your cooperation in ensuring compliance with Hawaii's CZM Program. If you have any questions, please contact John Nakagawa at 587-2878 or Debra Tom at 587-2840, of our CZM Program.

Sincerely,

Mary Lou Kobayashi

Mary Lou Kobayashi
Administrator

Exhibit J National Wetlands Inventory Map of Project Area



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