NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
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13.0267

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SEP 23 2013

September 10, 2013

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TO: GENEVIEVE SALMONSON, ACTING DIRECTOR
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
DEPARTMENT OF HEALTH

FROM: GLENN M. OKIMOTO, Ph.D., DIRECTOR,
DEPARTMENT OF TRANSPORTATION

SUBJECT: FINAL ENVIRONMENTAL ASSESSMENT WITH FINDING OF NO SIGNIFICANT IMPACT (FEA-FONSI) FOR THE PROPOSED KAHULUI AIRPORT CONSOLIDATED RENTAL CAR FACILITY (CONRAC), STATE PROJECT NO. AM1032-13, KAHULUI AIRPORT, MAUI, HAWAII, TMK (2) 3-8-001:019 (por.) AND 239

The State of Hawaii, Department of Transportation hereby transmits the Final Environmental Assessment with Finding of No Significant Impact (FEA-FONSI) for the Proposed Kahului Airport Consolidated Rental Car Facility (ConRAC). Please publish the notice of the FEA-FONSI for this project in the earliest publication of the Office of Environmental Quality Control (OEQC) Environmental Notice.

We have enclosed a completed OEQC Publication Form, two (2) copies of the FEA-FONSI and a CD (pdf file) of the publication form in MS Word and one (1) copy of the FEA-FONSI. Simultaneous with this letter, our consultant has submitted the summary of the action in a text file by electronic mail to your office.

Should you have any questions, please contact Mr. Gene Matsushige, Head Construction Engineer, at (808) 838-8826 or Mr. Stephen Culberson of Ricondo & Associates, Inc. (project consultant) at (808) 840-5294.

Enclosures: OEQC Publication Form
FEA-FONSI (1 copy)
CD (pdf file)

AGENCY ACTIONS
SECTION 343-5(B), HRS
PUBLICATION FORM (FEBRUARY 2013 REVISION)

Project Name Proposed Kahului Airport Consolidated Rental Car Facility
Island: Maui
District: Wailuku
TMK: (2) 3-8-001:019 (por) and 239
Permits: NEPA EA, Chapter 343 EA, Special Management Area Use Permit, NPDES Permit, and Noise Permit (as applicable)

Proposing/Determination Agency: State Department of Transportation, 400 Rodgers Boulevard, 7th Floor, Honolulu, Hawaii 96819, Jeffrey Chang, Phone: (808) 838-8835

Accepting Authority:
(for EIS submittals only)

Consultant: Ricondo & Associates, Inc., 3239 Ualena Street, Third Floor, Honolulu, Hawaii 96819, Stephen Culberson, Director, Phone: (808) 840-5294
(*Address, Contact Person, Telephone*)

Status (check one only):

__DEA-AFNSI	Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of DEA, a completed OEQC publication form, along with an electronic word processing summary and a PDF copy (you may send both summary and PDF to oeqchawaii@doh.hawaii.gov); a 30-day comment period ensues upon publication in the periodic bulletin.
_X_ FEA-FONSI	Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of the FEA, an OEQC publication form, along with an electronic word processing summary and a PDF copy (send both summary and PDF to oeqchawaii@doh.hawaii.gov); no comment period ensues upon publication in the periodic bulletin.
__FEA-EISPN	Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of the FEA, an OEQC publication form, along with an electronic word processing summary and PDF copy (you may send both summary and PDF to oeqchawaii@doh.hawaii.gov); a 30-day consultation period ensues upon publication in the periodic bulletin.
__Act 172-12 EISPN	Submit the proposing agency notice of determination on agency letterhead, an OEQC publication form, and an electronic word processing summary (you may send the summary to oeqchawaii@doh.hawaii.gov). NO environmental assessment is required and a 30-day consultation period upon publication in the periodic bulletin.
__DEIS	The proposing agency simultaneously transmits to both the OEQC and the accepting authority, a hard copy of the DEIS, a completed OEQC publication form, a distribution list, along with an electronic word processing summary and PDF copy of the DEIS (you may send both the summary and PDF to oeqchawaii@doh.hawaii.gov); a 45-day comment period ensues upon publication in the periodic bulletin.
__FEIS	The proposing agency simultaneously transmits to both the OEQC and the accepting authority, a hard copy of the FEIS, a completed OEQC publication form, a distribution list, along with an electronic word processing summary and PDF copy of the FEIS (you may send both the summary and PDF to oeqchawaii@doh.hawaii.gov); no comment period ensues upon publication in the periodic bulletin.
__ Section 11-200-23 Determination	The accepting authority simultaneously transmits its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS to both OEQC and the proposing agency. No comment period ensues upon publication in the periodic bulletin.
__Section 11-200-27 Determination	The accepting authority simultaneously transmits its notice to both the proposing agency and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is not required. No EA is required and no comment period ensues upon publication in the periodic bulletin.
__Withdrawal (explain)	

Summary (Provide proposed action and purpose/need in less than 200 words. Please keep the summary brief and on this one page)**:**

The purpose of the proposed Consolidated Rental Car (ConRAC) Facility at the Kahului Airport is to provide the necessary space for the on-Airport rental car companies to accommodate the ready/return service and quick turnaround (QTA) facilities in a single location on the Airport. Excess rental car storage, dealer preparation, and heavy maintenance will continue to be accommodated at the existing rental car facility locations on the Airport. The proposed ConRAC will provide adequate on-Airport facilities for the rental car companies, reduce traffic and congestion on the terminal roadway system and enhance the overall customer experience at the Kahului Airport.

The construction of the new ConRAC facility and its related improvements will be located on approximately 17 acres of land at the Kahului Airport. The ConRAC facility will include approximately 4,200 parking stalls for rental car use, as well as a quick turnaround area, office, customer service area, and fueling and car wash areas for the various rental car operators.

FINAL
ENVIRONMENTAL ASSESSMENT

PROPOSED CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
Kahului, Maui County, Hawaii

Prepared for:

STATE OF HAWAII, DEPARTMENT OF TRANSPORTATION – AIRPORTS DIVISION
As lead State Agency pursuant to Hawaii Revised Statutes, Chapter 343

and

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
As lead Federal Agency pursuant to the National Environmental Policy Act of 1969

Prepared by:

Ricondo & Associates, Inc.
Munekiyo & Hiraga, Inc.

September 2013

This environmental assessment becomes a Federal document when evaluated, signed and dated by the Responsible FAA Official.

Responsible FAA Official

September 6, 2013
Date

GENERAL INFORMATION ABOUT THIS DOCUMENT

WHAT'S IN THIS DOCUMENT? This document contains a Final Environmental Assessment prepared for the State of Hawaii's proposed Consolidated Rental Car Facility at Kahului Airport (OGG). This document discloses the analysis and findings of the potential impacts of the State of Hawaii, Department of Transportation – Airports Division's (HDOT-A) Proposed Action, the No Action, and other reasonable alternatives. This document serves to fulfill the requirements of both the National Environmental Policy Act of 1969 (NEPA) and its implementing Regulations found at 40 CFR 1500-1508 and Hawaii Revised Statutes Chapter 343.

BACKGROUND. Kahului Airport (OGG) is a regional airport located on the Island of Maui, in Maui County, Hawaii, three miles east of downtown Kahului. OGG is the primary airport on the island of Maui; it serves interisland destinations and is the only airport serving direct flights between the North American mainland and Maui. The purpose of the Proposed Action is to provide the necessary space for the on-Airport rental car companies to accommodate ready/return and quick turnaround (QTA) facilities in a single location on the Airport. The Draft EA was released on March 8, 2013. The notice of availability of the Draft EA was advertised in local newspapers to inform the general public and other interested parties. The public comment period on the Draft EA ended on April 8, 2013.

The document presented herein represents the Final EA for both the federal and state decision-making process. This document also fulfills FAA's policies and procedures relative to NEPA and other related federal requirements. Copies of the document are available for inspection at the Kahului Public Library and the administrative offices of Kahului Airport on the island of Maui, and at the administrative offices of HDOT-A and at the FAA's Airports District Office in Honolulu, as well as the FAA's Western-Pacific Region office in Hawthorne, California.

WHAT SHOULD YOU DO? Read the Final Environmental Assessment to understand the actions that HDOT-A and FAA intend to take relative to the proposed Consolidated Rental Car Facility at the Airport.

WHAT HAPPENS AFTER THIS? The FAA will decide to prepare and issue a Finding of No Significant Impact/Record of Decision (FONSI/ROD) or decide to prepare an Environmental Impact Statement.

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WESTERN-PACIFIC REGION

FINDING OF NO SIGNIFICANT IMPACT AND RECORD OF DECISION

Proposed Consolidated Rental Car Facility Project

Kahului Airport
Kahului, Maui County, Hawaii

For further information

Gordon K. Wong
U.S. Department of Transportation
Federal Aviation Administration
Western-Pacific Region
Honolulu Airports District Office
300 Ala Moana Boulevard, Room 7-128
Honolulu, Hawaii 96813
808-541-1232

September 9, 2013

GENERAL INFORMATION ABOUT THIS DOCUMENT

WHAT'S IN THIS DOCUMENT? This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) and Record of Decision (ROD) for the proposed Consolidated Rental Car Facility (CONRAC) Project at Kahului Airport (OGG) located in Kahului, Maui County, Hawaii. This document includes the agency determinations and approvals for those proposed Federal actions described in the Final Environmental Assessment dated September 2013. This document discusses all alternatives considered by FAA in reaching its decision, summarizes the analysis used to evaluate the alternatives, and briefly summarizes the potential environmental consequences of the Proposed Action, Project Alternative Sites 4 and 5, and the No Action alternative, which are evaluated in detail in this FONSI and ROD. This document also identifies the environmentally preferred alternative and the agency preferred alternative. This document identifies applicable and required mitigation.

BACKGROUND. In March 2013, the State of Hawaii, Department of Transportation – Airports Division (HDOT-A) prepared a Draft Environmental Assessment (DEA). The DEA addressed the potential environmental effects of the proposed CONRAC Project including various reasonable alternatives to that proposal. The DEA was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) [Public Law 91-190, 42 USC §§ 4321-4347], the implementing regulations of the Council on Environmental Quality (CEQ) [40 CFR Parts 1500-1508], and FAA Orders 1050.1E, *Environmental Impacts: Policies and Procedures* and 5050.4B, *National Environmental Policy Act (NEPA), Implementing Instructions for Airport Actions*. The HDOT-A published the Notice of Availability for the DEA on March 8, 2013 and received comments on the document through April 25, 2013. FAA approved the Final EA on September 9, 2013.

WHAT SHOULD YOU DO? Read the Finding of No Significant Impact and Record of Decision to understand the actions that FAA intends to take relative to the proposed CONRAC Project at Kahului Airport.

WHAT HAPPENS AFTER THIS? The HDOT-A may begin to implement the Proposed Action.

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT
AND
RECORD OF DECISION

PROPOSED CONSOLIDATED RENTAL CAR FACILITY PROJECT

KAHULUI AIRPORT
MAUI COUNTY, KAHULUI, HAWAII

1. **Introduction.** This document is a Finding of No Significant Impact (FONSI) on the environment and Record of Decision (ROD) (FONSI/ROD) as a result of proposed Consolidated Rental Car Facility (CONRAC) Project at Kahului Airport (OGG), Maui County, Hawaii. The State of Hawaii, Department of Transportation – Airports Division (HDOT-A) is the sponsor for Kahului Airport. The Federal Aviation Administration (FAA) must comply with the National Environmental Policy Act of 1969 (NEPA) before being able to take the federal actions of approval of those portions of the Airport Layout Plan (ALP) that depict the proposed projects. Approval of the ALP is authorized by the Airport and Airway Improvement Act of 1982, as amended (Public Laws 97-248 and 100-223).

2. **Purpose and Need of the Proposed Action.** As discussed in Section 1.3 of the Final Environmental Assessment (EA), the purpose of the Proposed Action is to provide the necessary space for the on-Airport rental car companies to accommodate ready/return and quick turnaround (QTA) facilities in a single location on the Airport that would provide adequate on-airport facilities, reduce traffic and congestion on the terminal roadway system, and enhance the overall customer experience. Excess rental car storage, dealer preparation, and heavy maintenance would continue to be accommodated at the existing rental car facility locations on the Airport. The Kahului Airport is a commercial service airport that accommodates both air carrier aircraft as well as general aviation. The existing car rental facilities do not provide adequate on-airport facilities. The anticipated increases in numbers of enplaned passengers and rental car transactions, and the projected space requirements for rental car facilities at OGG, as shown in Table 1-2 of the Final EA that forecast an additional 350,000 square feet will be needed to accommodate rental car facilities at OGG by 2020, and an additional 550,000 square feet are projected to be needed to accommodate rental car facilities at the Airport by 2025. The FAA's statutory mission is to ensure the safe and efficient use of navigable airspace in the United States. Pursuant to Title 49 United States Code (USC), Subtitle VII, as amended, FAA must ensure the proposed project does not derogate the safety of aircraft and airport operations at Kahului Airport.

3. **Proposed Project and Federal Actions.** The Proposed Action included in the construction of a multi-level rental car facility building (see Figures1-4 through 1-9 of the Final Environmental Assessment (EA)).

   The Proposed Action evaluated in this FONSI/ROD includes the following:

   - A Customer Service Building (CSB) where all rental car company counters and administrative offices would be located;
   - Ready/Return structure (three and a half levels – ground [at-grade] plus three elevated levels) for rental car staging and storage, rental car pick up and return, and Airport and car rental employee parking;
   - Quick Turnaround Area for refueling, light maintenance, and washing of returned rental cars;
   - Four 15,000 gallon fuel storage tanks (below-grade vaulted containment system within the CONRAC facility);
   - Trolley/shuttle to/from the passenger terminal area including maintenance area adjacent to stop;
   - Site landscaping;

- Roadway connections to the Airport terminal roadway system;
- Connections to existing utilities; and
- Flat-plate photovoltaic panels on the roof of the ready/return structure (installation by others).

The federal actions necessary to carry out the proposed projects include:

- Unconditional approval of the Airport Layout Plan (ALP) for OGG depicting the proposed improvements pursuant to 49 U.S.C. 40103(b), 44718, and 47107(a)(16); Title 14, Code of Federal Regulations (CFR), Part 77 (14 CFR 77),Safe, Efficient Use, and Preservation of the Navigable Airspace; and 14 CFR 157, Notice of Construction, Alteration, Activation, and Deactivation.

- Determination under 49 U.S.C. 44502(b) that the Proposed Action is reasonably necessary for use in air commerce or in the interest of national defense.

- Continued close coordination with the HDOT-A and appropriate FAA program offices, as required, to ensure safety during construction pursuant to 14 CFR 139, *Certification of Airports,* under 49 U.S.C. 44706.

4. Reasonable Alternatives Considered. Chapter 2 of the Final EA examined six alternatives including:

- Alternative 1
- Alternative 2
- Alternative 3
- Alternative 4
- Alternative 5 (HDOT-A's Proposed Action)
- No Action Alternative

Alternative 1 is approximately 20 acres and located on the site of the existing public parking lot (see Exhibit 2-2 of the Final EA). Additional parking would be required southwest of the site to replace the parking that would be displaced by the CONRAC. Alternative 1 is located entirely within the Special Management Area (SMA) regulated under the Hawaii Coastal Zone Management (CZM) Program. It is also partially located within a designated tsunami evacuation area.

Alternative 2 is approximately 22 acres and located along Alahao Street, north and west of the runway protection zone (RPZ) for Runway 5 (see Exhibit 2-4 of the Final EA). An airport drainage ditch is located on the western border of the site, and the existing rental car facilities are located to the south. Alternative 2 is located entirely within the SMA, a designated tsunami evacuation area, and a 100-year floodplain, as designated by the Federal Emergency Management Agency (FEMA).

Alternative 3 is approximately 4 acres, is located on Keolani Place (see Exhibit 2-6 of the Final EA). The CONRAC would need to be a nine-level structure to accommodate the projected rental car facility requirements. Alternative 3 is located entirely within the SMA, a designated tsunami evacuation area, and partially within a 100-year floodplain.

Alternative 4 consists of approximately 27 acres at the northeast corner of the intersection of Hana Highway and the future Airport Access Road (see Exhibit 2-8 of the Final EA). Alternative Site 4 is located outside of the SMA, designated tsunami evacuation area, and FEMA-designated 100-year floodplain. Alternative 4 would require the construction of additional roads to serve the ready/return and the QTA area entrances and exits. The physical distance between this site and the passenger terminal buildings would require a shuttle system for the movement of customers.

While Alternatives 1, 2, 3 and 4 are located on airport property, they were eliminated because they did not meet the purpose and need to reduce traffic and congestion on the terminal roadway system, and enhance the overall customer experience.

Analysis of the No Action Alternative is required pursuant to Title 40, Code of Federal Regulations (CFR) § 1502.14(d). Section 2.3.2.2 of the Final EA, states, "No viable off-Airport locations were identified to provide adequate facilities to accommodate projected rental car facility requirements, reduce traffic and congestion on the Airport terminal roadway system, or enhance the overall customer experience. Because viable on-Airport alternatives were identified that meet the purpose and need for the proposed project, off-Airport alternatives were eliminated from further consideration."

Paragraph 405(d) of FAA Order 1050.1E states, in part: "*An EA must consider the proposed action and a discussion of the consequences of taking no action, and may limit the range of alternatives to action and no action when there are no unresolved conflicts concerning alternative uses of available resources."*

Therefore, all off-Airport alternatives were eliminated for further review because they would not meet the purpose and need of the Proposed Action.

Further, Alternative 5 was the only location that provides adequate on-Airport facilities, reduce traffic and congestion on the terminal roadway system, and enhance the overall customer experience.

Alternative 5 (Preferred Alternative) consists of approximately 17 acres southwest of the existing public parking lot (see Exhibit 2-10 of the Final EA). Alternative 5 is located within the current SMA and FEMA-designated 100-year floodplain but will not result in a "significant encroachment" as described in Section 4.8 of the Final EA. Alternative 5 would include a CSB, a two-level ready/return structure with a third level for additional rental car staging and storage and Airport employee parking, and a QTA facility at-grade to accommodate the projected rental car facility requirements identified in Table 1-2. The third level above the at-grade QTA facility would accommodate approximately 719 Airport employee and 400 rental car staging and storage parking spaces. The CSB would face the existing public parking lot and a trolley/shuttle system would transport passengers to and from the passenger terminals (to a stop located across the street from the terminal). Exiting and returning rental cars would not be required to circulate through the terminal roadway system, which would reduce traffic and congestion at the Airport terminal curbs.

The primary considerations for the FAA in selection of a preferred alternative include the Purpose and Need for the project and the environmental impacts of the project. In its consideration of alternatives, the FAA is mindful of its statutory charter to encourage the development and safety of civil aeronautics in the United States (49 USC § 40104). The No Action Alternative has fewer environmental effects than the Proposed Action Alternative. However, the No Action Alternative does not meet the Purpose and Need for the proposed project.

5. **Assessment.** The potential environmental impacts and possible adverse effects were identified and evaluated in a Final EA prepared in September 2013. The Final EA has been reviewed by the FAA and found to be adequate for the purpose of the proposed Federal action. The FAA determined that the Final EA for the proposed project adequately describes the potential impacts of the Proposed Action. One commenter stated the relocation of the CONRAC is necessitated by the planned extension of Runway 5-23 and the runway extension should be discussed as a connected action. The response to this comment is stated in Chapter 6 summarizing this is not a connected action and that any runway extension project would be subject to environmental review under HRS 343 and NEPA. While HDOT-A is considering the extension of Runway 5-23 as part of the Airport Master Plan Update, no decision has been made on a Runway 5-23 extension. HDOT-A has not submitted any changes to Runway 5-23 on an Airport Layout Plan to the FAA for review and approval. FAA notes the extension to Runway 5/23 is an option described in the Draft Master Plan available on HDOT-A's website. No decision by HDOT-A has been expressed to FAA indicating HDOT-A intends to pursue this option at this time. Therefore analysis of any extension to Runway 5/23 is not ripe for federal review pursuant to NEPA. The Proposed Action is being done regardless of whether Runway 5-23 is extended or not. The Proposed Action is not a component of any proposal to move or extend Runway 5-23 at the Airport. No new issues surfaced as a result of the public review process.

The Final EA examined the following environmental impact categories: Noise; Compatible Land Use; Socioeconomic Impacts, Environmental Justice and Children's Health and Safety Risks; Secondary (Induced) Impacts; Air Quality; Water Quality; Wetlands; Floodplains; Coastal Resources; Fish, Wildlife and Plants; Department of Transportation Act Section 4(f); Historic, Architectural, Archeological and Cultural Resources; Light Emissions and Visual Impacts; Farmlands; Natural Resources and Energy Supply; Hazardous Materials, Pollution Prevention and Solid Waste; Construction Impacts, and Cumulative Impacts.

The environmental impact category of Wild and Scenic Rivers, and Coastal Barriers were not evaluated further because the Proposed Action at OGG would not pose an impact to these environmental resources. The HDOT-A has provided the FAA with the required Land Use Assurance Letter dated February 21, 2013.

A. Noise. Section 4.1 of the Final EA describes noise impacts resulting from the Proposed Action and the No Action alternatives. Section 4.1 notes the under the No Action alternative, and Alternative Site 5, there would be no change to existing air traffic patterns or aircraft movement areas. The proposed project will not induce or change the overall number of aircraft operations into and out of OGG. Sections 4.1.1 through 4.1.3 of the Final EA discuss the noise impacts of the No Action and Proposed Action Alternatives. The Proposed Action would not expose any noise sensitive areas to 65 DNL or cause noise-sensitive areas located at or above 65 DNL to experience a noise increase of at least DNL 1.5 decibels. Therefore, implementation of the Proposed Action would not result in a significant noise impact.

B. Compatible Land Use. Section 3.2 of the Final EA states the airport is located in the Wailuku District of the County of Maui. The County of Maui, *Wailuku-Kahului Community Plan*, identifies the area of the airport as "AP, Airport." Lands designated as "Airport" include: "…all commercial accessory use and general aviation airports and their accessory uses." The proposed CONRAC is an accessory use to Airport operations. Therefore the proposed project is consistent with community planning. Appendix D of the Final EA includes the required Land Use Assurance Letter dated February 21, 2013.

C. Socioeconomic Impacts, Environmental Justice and Children's Environmental Health and Safety Risk are discussed in Section 4.3 of the Final EA. The Final EA states the Proposed Action would occur entirely on Airport property and would not displace homes, residences or communities. The only business that would be affected is the UPS facility which was originally approved for relocation in 1997. An SMA permit for the relocation of the UPS facility was issued in 2009 with a time extension approved in 2012. There are no changes to noise and air quality as a result of the Proposed Action that would affect any local population groups. OGG is not located within an environmental justice block group. Therefore, the Proposed Action would not cause disproportionately high or adverse human health or environmental effects on minority and low-income populations. The Proposed Action would not create disproportionate risks to children because all project components are within the OGG boundaries, where there are no schools or daycare centers.

D. Secondary (Induced) Impacts. As discussed in Section 4.4, the Proposed Action would not result in any change on population or public service demand. The various components of the Proposed Action and its build alternative would have no impact on performance objectives of police protection, schools, parks, or other public service facilities. The various components of the Proposed Action and its build alternative would not generate any increase in the number of students or number of park users.

The Proposed Action and its build alternative would not result in additional police or fire protection services compared to existing conditions. Therefore, no impact to these public services would be anticipated. Implementation of the Proposed Action would not result in secondary impacts.

E. Air Quality. Section 4.5 of the Final EA states the Proposed Action will not result in additional aircraft operations. The entire State of Hawaii is considered to be an attainment area for all air quality standards based on *State of Hawaii, Department of Health, State of Hawaii Annual Summary 2011, Air Quality Data.* The air quality analysis for short -term emissions associated with the construction of the Proposed Action are included in Section 4.17. An operational emissions inventory is not required under NEPA and was not prepared for this EA. The air quality analysis for short term emissions associated with the construction of the Proposed Action are included in Section 4.17, and show that federal and State of Hawaii significance thresholds will not be exceeded. Table 4-1 shows that under the Proposed Action, the estimated construction emissions would be well below all the regulated pollutants.

F. Water Quality. Section 4.6 of the Final EA states the Proposed Action would not create a significant impact to water resources. Water Quality Best Management Practices (BMPs) will be integrated into a future storm water management plan (SWWP). Two storm water detention basins are proposed to accommodate the increased runoff associated with the Proposed Action. In addition, the car washing facilities will be designed to include water recycling to reduce the demand for water and reduce demand on the sewer system. Under the Proposed Action Alternative, there would be no significant impacts to surface water quality or groundwater quality.

G. Wetlands. Section 4.7 of the Final EA notes that the Proposed Action will not affect jurisdictional wetlands at OGG. However, Kalialinui Stream, which lies in a culvert beneath the site, is a jurisdictional Waters of the United States. The stream passes directly under the site in a buried concrete aqueduct and would not be affected by the construction or operation of the proposed CONRAC. The culvert will be protected during construction to prevent impacts to this Waters of the United States. In addition, BMPs would be implemented to prevent polluted runoff or inadvertent spills from reaching the stream during operation of the proposed CONRAC.

H. Floodplains. Section 4.8 of the Final EA states the proposed Alternative 5 is located within the 100-year floodplain. Section 4.8.4 of the Final EA states Alternative 5 will not result in a "significant encroachment" based on the three criteria listed in U.S. DOT Order 5650.2 that consider:

- A considerable probability of loss of human life,
- Likely future damage associated with the encroachment that could be substantial in cost or extent, including interruption of service or loss of a vital transportation facility, and
- A notable adverse impact on natural and beneficial floodplain values.

The lowest occupied floor of the CONRAC will be above the base flood elevation. Section 4.8.4 of the Final EA states the CONRAC is not considered a vital transportation facility as described in U.S. DOT Order 5650.2 Floodplain Management and Protection. The portion of Kalialinui Stream that flows through Alternative Site 5 is located in an underground culvert. The proposed CONRAC would be constructed above the culvert and would not affect the stream flow. Additionally, the proposed improvements would be constructed above the 100-year flood elevation. There is no private property or residential land uses located down-gradient of the Alternative Site 5 and would not impose a flood hazard on other properties or impair human health, safety, or welfare. In addition, two storm water detention basins would be constructed as part of this alternative to provide compensatory floodplain storage. The detention basins would also be designed in compliance with FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants on or Near Airports*, to minimize their attractiveness to wildlife. There is no practicable alternative to siting the Proposed Action in the floodplain. The Proposed Action will be designed to minimize potential harm to natural floodplain values. Also, the public has had the opportunity to review the encroachment through the public involvement process. See the Agency Finding on Floodplain below. Therefore, the Proposed Action's impact on the floodplain is not significant.

I. Coastal Resources. Section 4.9 of the Final EA states that all of OGG is within the jurisdictional area of the State of Hawaii Coastal Zone Management (CZM) Program and discusses the Proposed

Action's consistency with the objectives and policies of the CZM Program, which indicates that the Proposed Action is consistent with the State of Hawaii CZM Program. The Proposed Action will not cause or create short-term or long-term impacts to coastal resources. The State of Hawaii - Office of Planning (HOP) within the State of Hawaii Department of Business, Economic Development and Tourism (DBEDT) is responsible for concurring with the CZM consistency. HOP received a copy of the published Draft EA during the public review period. In a letter dated March 18, 2013, HOP stated the Proposed Action is not on a list of federal actions that trigger a consistency concurrence with the State's Coastal Zone Management Program (CZMP). Pursuant to paragraph 3.2 in Appendix A of FAA Order 1050.1E, the various components of the proposed action will not change the manner of use or quality of land, water, or other coastal resources, or limits the range of their uses.

J. Fish, Wildlife and Plants. Section 4.10 of the Final EA describes the potential impacts to fish, wildlife, and plants. A Biological Assessment dated November 2012 was prepared to evaluate the potential impacts to federally-listed threatened and endangered species and designated critical habitat (see Appendix H). For those federally-listed species identified as being potentially affected, field investigations were completed in February 2013 and confirmed that there is no evidence of federally-listed species.

FAA initiated Section 7 consultation on December 13, 2012, with the U.S. Fish and Wildlife Service (USFWS) for potential impacts to the federally listed Hawaiian hoary bat and Blackburn's sphinx moth. Consultations with the USFWS resulted in the Service concurring on March 27, 2013, with FAA's determination of not likely to adversely affect federally listed Hawaiian hoary bat, Hawaiian stilt, and Blackburn's sphinx moth (see Appendix A of the Final EA). To ensure that the action is not likely to adversely affect Hawaiian hoary bat, Hawaiian stilt, or Blackburn's sphinx moth, the USFWS requested the following measures will be taken:

<u>Hawaiian Hoary Bat</u>

1. The removal of trees or shrubs greater than 15 feet in height will not be conducted during the breeding season of the federally endangered Hawaiian hoary bat (from June 1 through September 15) during construction of the proposed projects.

2. No barbed wire will be installed as part of the implementation of the proposed project.

<u>Hawaiian Stilt</u>

3. The storm water detention basins proposed to be constructed will be designed to drain within a maximum 48-hour period and will have steep-sided slopes to prevent wildlife from utilizing these basins. If necessary, physical barriers, such as bird balls, wires grids, pillows, or netting, to prevent access of hazardous wildlife to open water and minimize aircraft-wildlife interactions may also be installed.

<u>Blackburn's Sphinx Moth</u>

4. Clearing work for the proposed project will not commence until after the dry season. Tree tobacco plants (host plant for the Blackburn's sphinx moth) will be cut down and treated with herbicide between October and November.

The USFWS has requested that an assessment of the potential impacts to invasive species introduction and transport due to the proposed construction activities be provided. The State of Hawaii Department of Agriculture has determined that the influx of invasive species into the State has a substantial impact on Hawaii's fragile natural environment, has prioritized the pathways through which invasive species are transported, and has created a biosecurity program as a statewide mitigation plan to minimize the spread of invasive species in Hawaii. This biosecurity program, detailed in Act 236, Session Laws of Hawaii (SLH) 2008, targets potential invasive species entering the State. All construction materials utilized on the project would be subject to invasive species inspection screening procedures already in

place on Maui. The No Action and Proposed Action do not increase the number of aircraft operations to OGG.

K. Department of Transportation Act, Section 4(f). Section 4.11 of the Final EA states neither the Proposed Action nor the No Action Alternative would have impacts on any Section 4(f) resources due to direct use or constructive use. Implementation of the Proposed Action would not directly impact the parks and recreation areas identified in Section 3.3. The Proposed Action would not require the acquisition or actual use of property within the surrounding parks and recreation areas. Therefore, no direct use would occur. The Proposed Action would not change the noise exposure from aircraft using the runways at OGG. The Proposed Action would not significantly affect views at the Kanahā Pond State Wildlife Sanctuary, Kanahā Beach Park, or other areas where scenic views contribute substantially to the recreational experience. Therefore Alternative 5 would not have a significant impact on recreational resources. Impacts on historic resources, which are also considered DOT Section 4(f) resources, resulting from the Proposed Action, are addressed below in Section 4.12; these impacts would not be significant. Therefore, there would be no indirect or constructive use of this resource.

L. Historic, Architectural, Archaeological and Cultural Resources. Section 4.12 of the Final EA notes that the FAA submitted a Section 106 Consultation letter for the Proposed Action to the State of Hawaii Historic Preservation Division (SHPD) on October 2, 2012. The letter determined that there are no historic properties listed or eligible for listing on the National Register of Historic Places (NRHP), and consequently the FAA found the proposed undertaking would not affect any properties listed or eligible for listing on the NRHP within the original APE. The FAA determined the APE by using the boundaries of the entire area that would have a physical disturbance (see Exhibit 3-1 of the Final EA). Since the proposed undertaking will not affect the number and type of aircraft using the Airport, the FAA delineated a direct effects APE only. There would be no change in the indirect effects from aircraft noise resulting from the proposed undertaking. The FAA also sent a letter dated October 2, 2012 (see Appendix A) to the Office of Hawaiian Affairs (OHA) to determine if they have any comments about the proposed undertaking; however, no comments were received from OHA.

The SHPD did not respond to the FAA's October 2, 2012 consultation letter, seeking concurrence with FAA's determination of eligibility and finding of effect. Pursuant to 36 CFR 800.4(d)(1), FAA may consider a lack of objection within 30 days of receipt of the adequately documented finding as satisfying FAA's obligations under Section 106.

M. Light Emissions and Visual Impacts. Section 4.13 of the Final EA discusses that the Proposed Action would result in new lighting sources but would be consistent with lighting in an urban environment. There would be no significant light emission impacts. The proposed project would have a maximum height of 76.5 feet above ground level (AGL). The existing Kahului Airport Terminal buildings are approximately 35 feet AGL. The potential effect on the visual landscape may be minimized with the implementation of the following mitigation measures:

1. A set back of approximately 170 feet to 750 feet from Keolani Place and 60 feet to 70 feet from the Airport Access Road reduces the visual impact to drivers along those corridors. In addition, the upper level would be tiered and screened with the photovoltaic panels.
2. The first level of the CONRAC would be located below the planned elevation of the Airport Access Road.
3. The proposed landscaping plan includes the installation of field stock trees and landscaping along the four (4) sides of the CONRAC to soften the appearance of the structure.
4. Earthen berms would be installed along the north side of the CONRAC to provide a visual relief for the structure.

Cognizant of the proposed mitigation measures, there would be no significant visual impacts from the Proposed Action.

N. Farmlands. Section 4.14 of the Final EA states the Proposed Action Alternative and the No Action Alternative are not located on important agricultural lands and therefore would have no impacts to farmland as defined under the Farmland Protection Act.

O. Natural Resources and Energy Supply. Section 4.15 of the Final EA states there would be no long-term operational impacts on natural resources and energy supply under the Proposed Action Alternative as compared to the No Action Alternative. The new and replacement facilities would be constructed with more energy and water efficient features than present in the existing facilities; thus, operation of the new facilities should result in a reduction of energy needs. The design for the CONRAC would include the infrastructure to accommodate photovoltaic panels to reduce energy consumption and will achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures. The Proposed Action would also result in elimination of the rental car shuttle buses, which would further reduce natural resources consumption. As a result, there would be no significant impacts to natural resources and energy supply.

P. Hazardous Materials, Pollution Prevention and Solid Waste. Section 4.16 of the Final EA notes that the consolidation of rental car services in one area would centralize fuel storage tanks used for QTA activities. The tanks located where the rental car companies would continue to perform maintenance and staging would remain in place but become secondary. The centralization of the fuel tanks would reduce the potential for creating a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials. All rental car activity would be conducted in conformance with regulatory requirements governing and mitigating the effects of fuel spills and disposal of hazardous materials. The Proposed Action would not significantly increase or decrease the production of solid waste at OGG. Any existing solid waste collection facilities would continue to remain following completion of the proposed CONRAC. No additional solid waste generation beyond that created under existing conditions is expected to result from the Proposed Action. Construction of the proposed CONRAC would result in the generation of construction and demolition debris, which is discussed in Section 4.17 Construction Impacts. Implementation of the Proposed Action would not result in significant impacts.

Q. Construction Impacts. Section 4.17 of the Final EA states that the Proposed Action may create some increases in dust and equipment emissions, noise, and soil erosion. These impacts are distinct and temporary in duration. Construction activities would involve excavation, grading, and pile driving equipment. Because of the location of the Proposed Action to Hana Highway and the airfield and local roadways, the noise generated by construction activity would not be significantly greater than the noise generally experienced in the surrounding areas. The land uses surrounding the Airport are generally industrial and commercial in nature, no noise sensitive land uses are located in the area immediately adjacent to the site. Therefore, any ground-borne vibration or noise impacts resulting from construction activities would be temporary and have no significant impacts. Estimated air emissions associated with the construction of the Proposed Action are shown in Table 4-1 and indicate that air emissions of each of the pollutants associated with construction activities would not exceed the established General Conformity *de minimus* thresholds or State of Hawaii significance thresholds for applicable pollutants.

Project specific best management practices and adherence to Storm Water Management Plan and National Pollutant Discharge Elimination System operating permit for the Airport would be employed during construction to control the discharge of sediment and other pollutants so that there would be no significant construction impacts.

R. Cumulative Impacts. An evaluation of cumulative impacts from these cumulative actions is discussed in Section 4.18 of the Final EA. For the purposes of the cumulative impact analysis, other projects at OGG or within one mile of OGG that have been completed within the last five years or are currently ongoing were considered for the past and present projects. Reasonably foreseeable actions that have requested or received approval for implementation were also considered. As a result of this evaluation, no significant cumulative impacts were identified.

S. Environmentally Preferred Alternative and FAA Preferred Alternative. In connection with its decision to approve the proposed ALP revisions, the FAA considered the environmental impacts from Alternative 5 (Proposed Action) and the No Action Alternatives. The FAA determined that all practicable means to avoid or minimize environmental harm under Alternative 5 have been adopted and there would be no significant environmental impacts from the proposed CONRAC project and that the project would not jeopardize the safe and efficient operations at the Airport. The No Action alternative has fewer environmental effects than the Proposed Action alternative and thus would be the environmentally preferred alternative. However, the No Action alternative does not meet the Purpose and Need for the proposed project. Thus, the FAA's preferred alternative is Alternative 5 (Proposed Action), because it meets the Purpose and Need of the proposed project with minimum adverse environmental effects.

6. **Public Participation.** The public was encouraged to review and comment on the Draft EA which was released for public review on March 8, 2013. The HDOT-A published a notice of availability of the Draft EA in the *Star Advertiser* and *The Maui News,* local newspapers in the vicinity of the Airport. Notification of the document's availability was also accomplished through the State of Hawaii Office of Environmental Quality Control's "*The Environmental Notice"* and the Draft EA document was available in their online library for review. The Draft EA was distributed to federal, state, and local agencies and organizations having an interest and/or jurisdictional responsibility in the study. Copies of the document were also available for review at two libraries on Oahu and Kahului, the administrative offices of HDOT-A, at FAA's office in Honolulu, Hawaii. The public review of the Draft EA ended on April 8, 2013. The comment letters that were received during the comment period and responses to the comments are included in Appendix A. There were 34 comments.

   One letter from the U.S. Army Corps of Engineers identified aquatic resources that may be subject to Corp's regulatory jurisdiction which is discussed in Section 3.7.2 that there were no wetlands found or Jurisdictional Waters of the United States affected.

   There was one commenter stating the relocation of the new CONRAC is necessitated by the planned extension of Runway 5-23 and should be discussed as a connected action. The consolidation of the car rental facilities was part of the 2008 Statewide Car Rental Facilities Development Study. The extension of Runway 5-23 to 7,000 feet is still under consideration by HDOT-A as one alternative to maintaining uninterrupted airline service to the island of Maui during the time when the necessary major repairs and potential extension are made to Runway 2-20. However, these projects are still under study and no proposal has been made to the FAA at this time. Any proposed runway extension project would be subject to independent environmental review under HRS 343 and the NEPA at such time that HDOT-A and FAA agree that the planning required to identify and analyze feasible alternatives to the reconstruction of Runway 2-20 is sufficient to proceed.

   The remaining comments referenced State and City policies and required permits prior to start of construction. The comment letters that were received during the comment period and responses to the comments are included in Chapter 6. No new issues surfaced as a result of the public review process. Copies of the Draft EA newspaper Affidavit of Publications are provided in Appendix I of the Final EA.

7. **Inter-Agency Coordination.**
   In accordance with 49 USC § 47101(h), the FAA has determined that no further coordination with the U.S. Department of Interior or the U.S. Environmental Protection Agency is necessary because the Proposed Action does not involve construction of a new airport, new runway or major runway extension that has a significant impact on natural resources including fish and wildlife; natural, scenic, and recreational assets; water and air quality; or another factor affecting the environment.

8. **Reasons for the Determination that the Proposed Action will have No Significant Impacts.**

   The attached Final EA examines each of the various environmental resources that were deemed present at the project location, or had the potential to be impacted by the Proposed Action. The proposed Consolidated Rental Car Facility Project at Kahului Airport would not involve any environmental impacts, after mitigation that would exceed the threshold of significance as defined by

FAA Orders 1050.1E and 5050.4B. Based on the information contained in the Final EA, the FAA has determined that the Proposed Action is the most feasible and prudent alternative. The FAA has decided to implement the Proposed Action as described in Section 3 of this FONSI/ROD.

9. Agency Findings.

The FAA makes the following determination for this project based on information and analysis set forth in the Final EA and other portions of the administrative record.

a. The project is reasonably consistent with existing plans of public agencies for development of the area [49 U.S.C. 47106(a)]. The proposed project is consistent with the plans, goals and policies for the area, including the County of Maui's *Wailuku-Kahului Community Plan*. The proposed project is also consistent with the applicable regulations and policies of federal, State and local agencies.

b. Wetlands: The FAA has determined that the project will not affect wetlands as discussed in Sections 3.7 and 4.7 of the Final EA.

c. Floodplain: As discussed in Section 5 of this FONSI/ROD and Sections 3.7 and 4.8 of the Final EA, the Proposed Action would occur within the 100-year floodplain for Kalialinui Stream. The FAA evaluated practicable alternatives to avoid the floodplain in accordance with EO 11988 *Floodplain Management*. No prudent or feasible alternatives which would avoid the floodplain and provide the floodplain protections incorporated into the Proposed Action were identified. Kalialinui Stream lies in a culvert beneath the site. It is a jurisdictional Waters of the United States. Because this stream passes directly under the site in a buried concrete culvert, it would not be affected by the construction or operation of the proposed project and will be protected during and after construction. Because the stream is in a culvert below the ground, the FAA finds that the Proposed Action is designed to minimize risks for flood-related property loss, impacts on human safety, health, and welfare. The FAA has determined that the selected alternative would not involve a significant encroachment on a floodplain as defined in DOT Order 5650.2, which implements Executive Order 11988. These Orders establish a policy to avoid supporting construction within a 100-year floodplain where practicable, and where avoidance is not practicable, to ensure that the construction design minimizes potential harm to or within the floodplain

d. Independent and Objective Evaluation: As required by the Council on Environmental Quality (40 CFR § 1506.5), the FAA has independently and objectively evaluated this proposed project. As described in the Final EA, the Proposed Action and the No Action alternatives were studied extensively to determine the potential impacts and appropriate mitigation measures for those impacts. The FAA provided input, advice, and expertise throughout the analysis, along with administrative and legal review of the project.

10. Decision and Orders.

Based on the information in this FONSI/ROD and supported by detailed discussion in the Final EA, the FAA has selected the proposed CONRAC Project as the FAA's Preferred Alternative. The FAA must select one of the following choices:

- Approve agency actions necessary to implement the Proposed Action, or
- Disapprove agency actions to implement the Proposed Action.

Approval signifies that applicable federal requirements relating to the proposed airport development and planning have been met. Approval permits the Hawaii Department of Transportation - Airports Division to proceed with implementation of the Proposed Action and associated mitigation measures. Disapproval would prevent HDOT-A from implementing the Proposed Action elements within Kahului Airport.

Under the authority delegated to me by the Administrator of the Federal Aviation Administration, I find that the project is reasonably supported. I, therefore, direct that action be taken to carry out the agency actions discussed more fully in Section 3 of this FONSI/ROD.

1. Unconditional approval of the portion of the Airport Layout Plan (ALP) that depicts the proposed Consolidated Rental Car Facility submitted by HDOT-A for Kahului Airport, pursuant to 49 U.S.C. § 40103(b), 44718 and 47101(a)(16) and 14 CFR Part 77. The approval of the ALP is based on determinations through the aeronautical study process regarding obstructions to navigable airspace, and the Airport development proposal is acceptable from an airspace perspective.

2. Approval to proceed with further processing of an application for Federal assistance for those eligible development projects described as the Proposed Action within the Final EA and this FONSI/ROD, under 49 U.S.C. §§ 47106 and 47107, for federal funding under the Airport Improvement Program (AIP) and under 49 U.S.C. § 40117, as implemented by 14 CFR § 158.25 to impose and use passenger facility charges (PFCs) collected at HNL for the Proposed Action to assist with construction of potentially eligible development items shown on the ALP.

3. Determination under 49 U.S.C. § 44502(b) that the proposed CONRAC Project is reasonably necessary for use in air commerce or in the interest of national defense.

This order is issued under applicable statutory authorities, including 49 USC §§ 40101(d), 40103(b), 40113(a), 44701, 44706, 44718(b), and 47101 et seq.

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information, I find the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101(a) of the National Environmental Policy Act of 1969 (NEPA). I also find the proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to section 102(2)(C) of NEPA. As a result, FAA will not prepare an EIS for this action.

APPROVED:

9/9/13

Mark A. McClardy
Manager, Airports Division, AWP-600

Date

DISAPPROVED:

Mark A. McClardy
Manager Airports Division, AWP-600

Date

RIGHT OF APPEAL

This FONSI/ROD constitutes a final order of the FAA Administrator and is subject to exclusive judicial review under 49 U.S.C. § 46110 by the U.S. Circuit Court of Appeals for the District of Columbia or the U.S. Circuit Court of Appeals for the circuit in which the person contesting the decision resides or has its principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110. Any party seeking to stay implementation of the ROD must file an application with the FAA prior to seeking judicial relief as provided in Rule 18(a) of the Federal Rules of Appellate Procedure.

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1. Purpose and Need

1.1 Introduction

Kahului Airport (OGG or the Airport) served approximately 5.5 million domestic and international passengers in 2012.[1] OGG is classified as a medium-hub commercial service airport in the Federal Aviation Administration (FAA) National Plan of Integrated Airport Systems (NPIAS). Hub classification is based on the number of passengers enplaned at an airport, and a "medium hub" classification means that the airport accommodates between 0.25 percent and 1.00 percent of total U.S. enplaned passengers.[2] The State of Hawaii Department of Transportation - Airports Division (HDOT-A) owns and operates an airport system which includes OGG. The HDOT-A proposes to construct and operate a consolidated rental car (ConRAC) facility and associated improvements on the Airport.

This Environmental Assessment (EA) was prepared in accordance with the requirements of Section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969 and its implementing regulations found at Title 40, Code of Federal Regulations (CFR) §§ 1500-1508,[3] and Section 509(b)(5) of the Airport and Airway Improvement Act of 1982, as amended. The FAA, as the lead federal agency responsible for ensuring that airport development actions are in compliance with NEPA, must review the potential environmental effects of a proposed project before taking any action to approve the proposed project. This EA was also prepared in accordance with FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*[4] and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.[5]

NEPA requires federal agencies to prepare environmental documentation that discloses to decision-makers and the interested public a clear, accurate description of potential environmental effects resulting from

1 Federal Aviation Administration, *APO Terminal Area Forecast Detail Report*, issued January 2013.

2 U.S. Department of Transportation, Federal Aviation Administration, *Report to Congress: National Plan of Integrated Airport Systems (NPIAS), 2011-2015,* September 27, 2010.

3 42 United States Code [U.S.C.] 4321-4370h.

4 U.S. Department of Transportation, Federal Aviation Administration, Order 1050.1E, *Environmental Impacts: Policies and Procedures*, June 8, 2004, Change 1, effective March 20, 2006.

5 U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, effective April 28, 2006.

proposed federal actions and reasonable alternatives to those actions. Through NEPA, the U.S. Congress directed federal agencies to integrate environmental factors in their planning and decision-making processes and to encourage and facilitate public involvement in decisions that affect the quality of the human environment. Federal agencies are required to consider the environmental impacts of a proposed action, alternatives to the proposed action, and a no action alternative (assessing the potential environmental effects of not undertaking the proposed action).

The HDOT-A prepared this EA on behalf of the FAA, in compliance with FAA Orders 1050.1E and 5050.4B, to evaluate the potential environmental impacts of construction and operation of a ConRAC facility and associated improvements, which together constitute the "Proposed Action" evaluated in this EA. The proposed ConRAC facility would not affect (increase or decrease) the number of aircraft operations or the routing of aircraft in the air to or from the Airport.

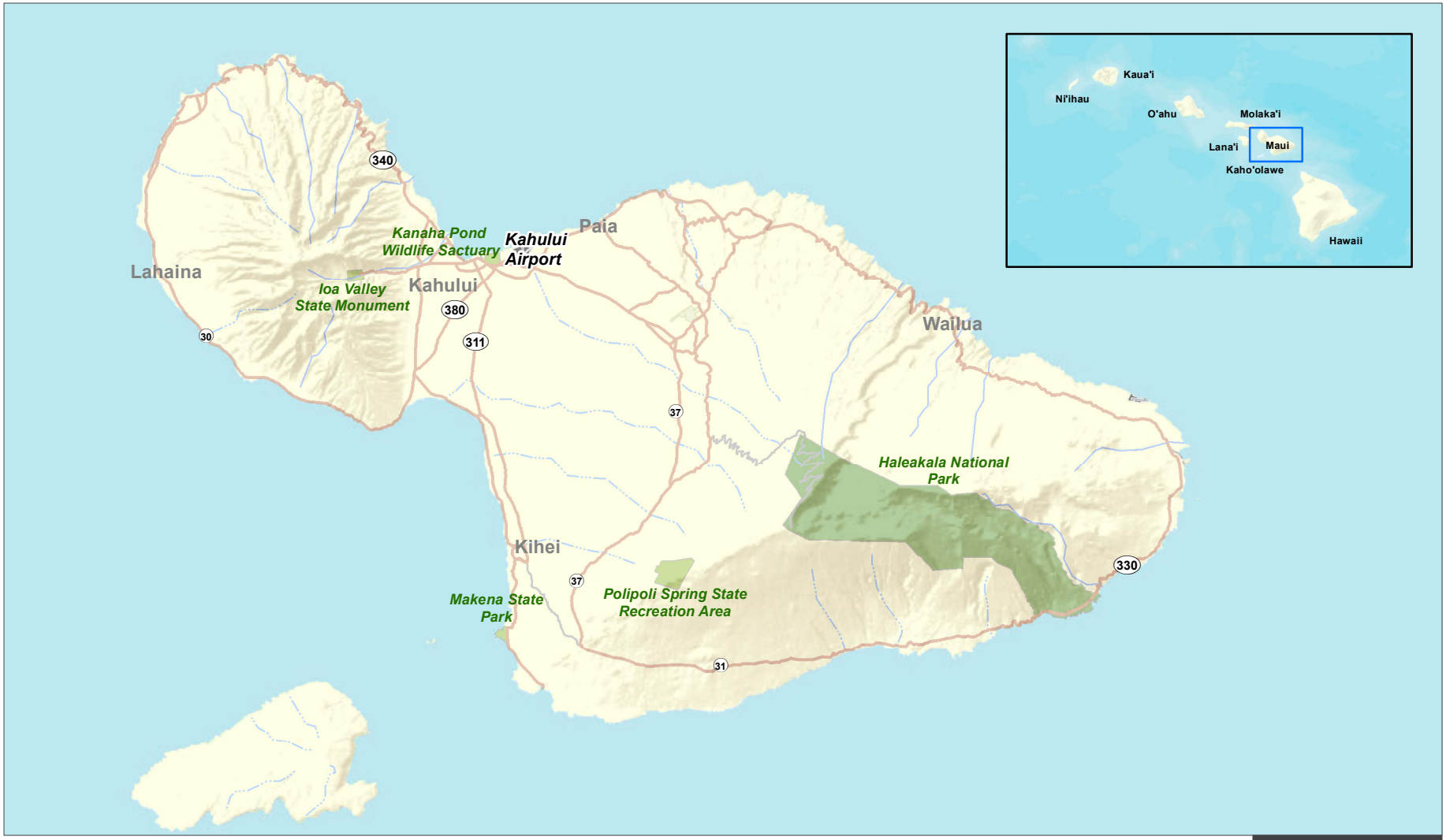
This EA was also prepared to comply with Hawaii Revised Statutes (HRS) Chapter 343, *Environmental Impact Statements*. The purpose of HRS Chapter 343 is to "integrate the review of environmental concerns with existing planning processes of the State and Counties and alert decision makers to significant environmental effects which may result from the implementation of certain actions."[6] Implementing administrative rules for the statute are published by the State Department of Health, Chapters 11-200 and 201; these rules require early consultation; evaluation of the technical, economic, social, and environmental effects of the proposed action; description of the affected environment; identification of direct, indirect, and cumulative impacts and any alternatives considered; and formulation of measures to mitigate adverse direct, indirect, and cumulative impacts of the proposed action.

The purpose of and need for the Proposed Action are described in this chapter, along with background information and a description of the Proposed Action.

1.2 Background

Kahului Airport (OGG) is a regional airport located in Maui County, Hawaii, 3 miles east of downtown Kahului. OGG is the primary airport on the island of Maui; it serves interisland destinations and is the only airport serving direct flights between the North American mainland and Maui. A general location and vicinity map of OGG is presented on **Exhibit 1-1**.

[6] Hawaii Revised Statutes, *Environmental Impact Statements*, Section 343-1, 2011.



SOURCE: ESRI, USA Base Map, 2010.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 1-1

NORTH 0 Not to Scale

Airport Location and Vicinity Map

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The Airport has two runways, Runway 2-20 and Runway 5-23 (see **Exhibit 1-2**). Runway 2-20 is the primary and longest runway. Kahului Airport has two passenger terminals, a main terminal and a commuter terminal, with 40 gates in total. The Airport is served by seven on-Airport rental car businesses (Alamo Rent A Car, Avis Rent A Car System, Budget Rent A Car System, Dollar Thrifty Automotive Group or Dollar Rent A Car, Enterprise Rent-A-Car, The Hertz Corporation, and National Car Rental), which have outgrown the existing overflow vehicle storage facilities on-Airport. The existing rental car facilities at OGG are located northwest of the passenger terminal area and public parking lots. With the exception of Enterprise customers, all customers returning rental cars must circulate through the Airport terminal roadway system, adding traffic and congestion to the on-Airport roadways.[7] **Exhibit 1-3** depicts the location of the existing on-Airport rental car facilities.

The FAA approved forecasts of aviation activity for OGG as part of the Airport Master Plan Update.[8] The Master Plan Update forecasts for OGG indicate increases in numbers of enplaned passengers through Fiscal Year (FY) 2025, at a compounded annual growth rate (CAGR) of 0.9 percent, resulting in approximately 160,000 more enplaned passengers in FY 2020 compared with the number enplaned in 2011, and approximately 300,000 more enplaned passengers in FY 2025 than in 2011 (see **Table 1-1**). This forecast increase in numbers of enplaned passengers would also create increased demand for rental cars.

Table 1-1 Master Plan Update Forecasts for Kahului Airport

TYPE OF ACTIVITY	2011 (ACTUAL)	FORECAST FY 2015	FORECAST FY 2020	FORECAST FY 2025
Total Aircraft Operations	119,362	123,587	129,980	135,535
Total Enplaned Passengers 1/	2,737,673	2,719,196	2,895,642	3,049,524
Average Annual Growth Compared with 2011 Numbers (Enplaned Passengers)		**-0.2%**	**0.6%**	**0.8%**

NOTE:

FY = Fiscal Year (October 1 through September 30)

1/ The Master Plan Update forecasts were prepared during a period of declining or flat growth at Kahului Airport; actual enplaned passengers at OGG in 2011 and 2012 are higher than the Master Plan Update forecasts for the same time period.

SOURCE: State of Hawaii Department of Transportation - Airports Division, *Kahului Airport Master Plan Update*, [in process].
PREPARED BY: Ricondo & Associates, Inc., November 2012.

7 The Enterprise rental car facilities are located on Keolani Place west of the other facilities. Enterprise rental car customers do not need to circulate through the passenger terminal roadway system.

8 Letter from Mr. Gordon Wong, Lead Program Manager, Federal Aviation Administration, Western-Pacific Region Office, Airports District Office, to Mr. Jeffrey Chang, Engineering Program Manager, State of Hawaii, Department of Transportation - Airports Division, April 3, 2012.

Exhibit 1-3 shows the amount of space leased by each rental car company at OGG; approximately 1,052,000 square feet of land, or just over 24 acres, is leased by the seven rental car companies operating at the Airport. Although additional Airport land in the vicinity of the existing rental car company sites can be used for overflow rental car storage, insufficient area is designated for overflow vehicle storage. Future ConRAC facility space requirements were determined based on a survey conducted in 2011 and updated in 2012, an analysis of rental car transaction data, and anticipated passenger demand, as identified in the Master Plan Update forecasts. As shown in **Table 1-2**, the existing (2011) rental car facility requirements consist of approximately 1.8 million square feet (about 41 acres), and the requirements are projected to increase to approximately 2.1 million square feet (about 49 acres) by 2020, and to approximately 2.3 million square feet (about 53 acres) by 2025. Because of the expense of construction, and the HDOT-A's desire to construct facilities to accommodate future requirements through at least 2025 without requiring facility expansion within the first 5 to 10 years after completion, the 2025 facility requirements were used to determine the optimal facility sizing.

1.3 Purpose and Need

1.3.1 PURPOSE OF THE PROPOSED ACTION

The Proposed Action is the construction and operation of a consolidated rental car facility at Kahului Airport. The purpose of the Proposed Action is to provide the necessary space for the on-Airport rental car companies to accommodate ready/return[9] and quick turnaround[10] (QTA) facilities in a single location on the Airport. Excess rental car storage, dealer preparation, and heavy maintenance would continue to be accommodated at the existing rental car facility locations on the Airport.

[9] Ready/return refers to the area where customers pick up and return rented vehicles.

[10] Quick turnaround facilities include fueling, car wash, and support facilities that provide for returned vehicles to be returned to service quickly, reducing the amount of storage space needed for rental cars.

SOURCES: Environmental Systems Research Institute, 2010 (base map); Maui County Geographic Information Systems Division, Department of Management, 2012 (roads); Department of Transportation, Airports Division, June 2011 (property boundary, terminals, runways).
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 1-2

Kahului Airport

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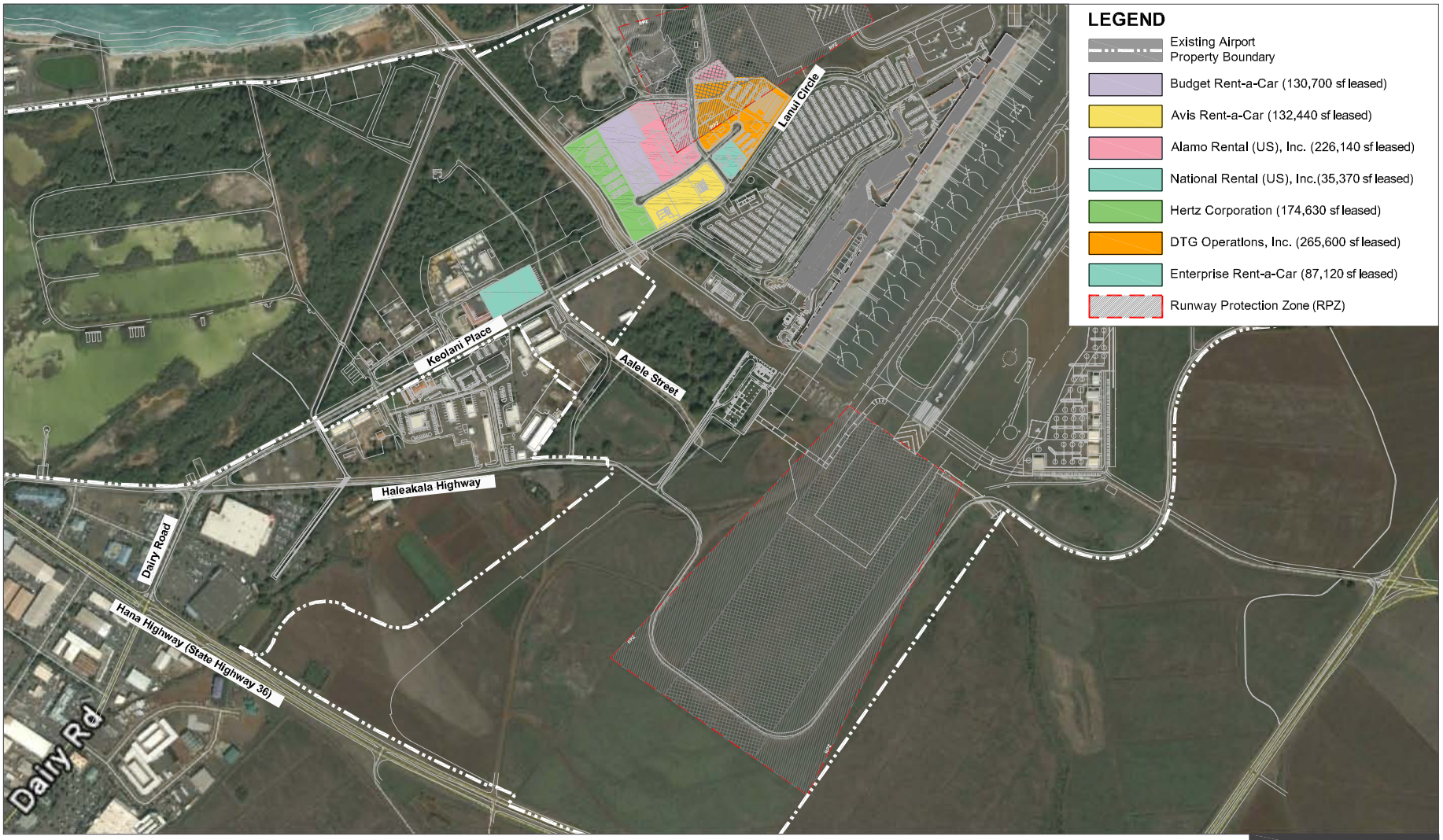

SOURCE: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Master Plan, April 19, 2011; Ricondo & Associates, Inc.,November 2012.
PREPARED BY: Ricondo & Associates, Inc, September 2013.

EXHIBIT 1-3

NORTH 0 1,100 ft.

Existing Rental Car Facilities

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 1-3 Existing Rental Car Company Sites.dwg_Layout: EA Ex 1-3_Sep 06, 2013, 12:36pm

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Table 1-2 Projected Rental Car Facility Requirements

	EXISTING (2011) SPACE REQUIREMENTS		PROJECTED 2020 SPACE REQUIREMENTS		PROJECTED 2025 SPACE REQUIREMENTS	
AREA	**QUANTITY**	**SQUARE FEET**	**QUANTITY**	**SQUARE FEET**	**QUANTITY**	**SQUARE FEET**
Customer Service Area						
Customer Service Area		29,470		35,430		38,730
Circulation/1	25%	7,370	25%	8,860	25%	9,680
Counter Positions	94		113		124	
Ready/Return Area						
Ready/Return Vehicles	1,665	481,770	2,002	578,910	2,188	632,930
Quick Turnaround/Service Area						
Fueling/Car Preparation Positions	56		67		74	
Wash Bays	14		17		18	
Maintenance Bays	8		10		11	
Quick Turnaround/Service Area		256,130		307,530		336,280
Site						
Arrival/Bus Plaza		43,560		52,270		57,060
Landscaping		74,050		74,050		74,050
Site Circulation		37,030		37,030		37,030
TOTAL FACILITY AREA		**929,380**		**1,094,080**		**1,185,760**
Service Center/Overflow Vehicle Storage	2,858	865,970	3,436	1,040,210	3,755	1,136,040
TOTAL REQUIREMENTS		**1,795,350**		**2,134,290**		**2,321,800**

/1 = Circulation equals 25 percent of the area required for the Customer Service Area facilities.

SOURCE: Demattei Wong Architecture, *Kahului Airport Consolidated Rental Car Facility Program Summary*, June 2012.
PREPARED BY: Ricondo & Associates, Inc., February 2013.

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1.3.2 NEED FOR THE PROPOSED ACTION

1.3.2.1 Provide Adequate on-Airport Facilities for the Rental Car Companies

The need for the Proposed Action is based on both current rental car facility requirements, the anticipated increases in numbers of enplaned passengers and rental car transactions, and the projected space requirements for rental car facilities at OGG, as shown in Table 1-2. Compared with conditions in 2011, an additional 350,000 square feet (8 acres) are projected to be needed to accommodate rental car facilities at OGG by 2020, and an additional 550,000 square feet (12.5 acres) are projected to be needed to accommodate rental car facilities at the Airport by 2025.

Overflow vehicle parking is accommodated at the existing rental car facilities but the rental car companies frequently run out of space and park in any available spaces around the Airport. Provision of a consolidated rental car facility would make the existing rental car property available for overflow vehicle storage.

1.3.2.2 Reduce Traffic and Congestion on the Terminal Roadway System

Because of the location of the existing rental car facilities, all rental car customers returning vehicles (with the exception of Enterprise customers) must circulate through the terminal roadway system, adding to traffic and congestion in front of the main and commuter terminals. In addition, the rental car companies all operate their own shuttle service between the terminals and their respective facilities, where they pick up and drop off their customers, adding to terminal roadway congestion during peak periods.

1.3.2.3 Enhance the Overall Customer Experience

As noted above, rental car customers board company-specific rental car shuttles and travel by shuttle between the terminal and the respective rental car company facility to pick up and after dropping off their rental cars. Reducing the length of trip required, wait and travel times for shuttle buses or other form of conveyance such as a trolley, walking distances, and congestion on the Airport terminal roadway system would improve the customer experience.

1.4 FAA's Purpose and Need

The FAA's statutory mission is to ensure the safe and effective use of navigable airspace in the United States. The FAA must ensure that the Proposed Action does not derogate the safety of aircraft and Airport operations at OGG.

1.5 Proposed Action

The Proposed Action is to construct and operate a consolidated rental car facility on the Airport. The proposed ConRAC facility is expected to include:

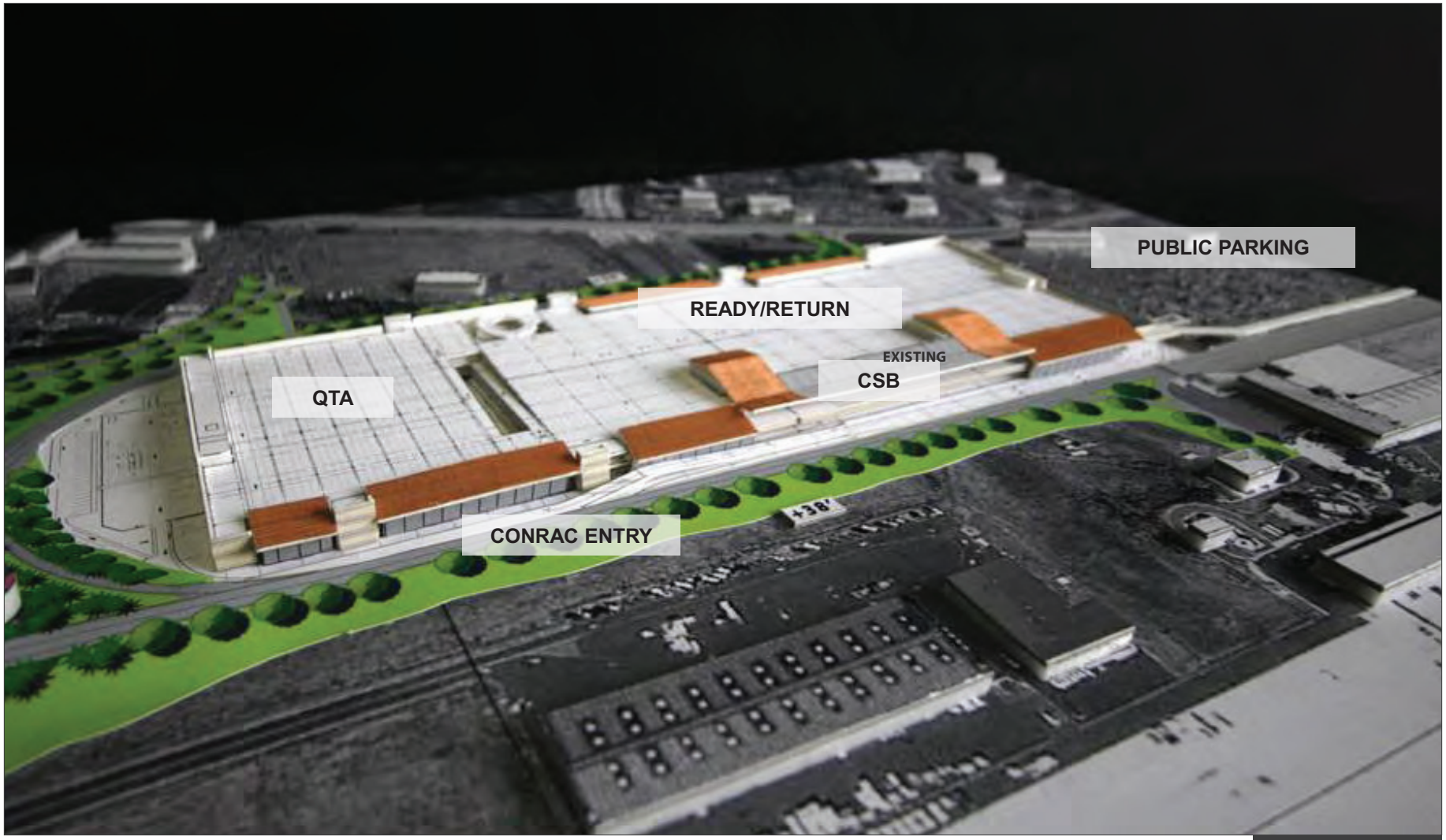
- A Customer Service Building (CSB) where all rental car company counters and administrative offices would be located;

- Ready/Return structure (three and a half levels – ground [at-grade] plus three elevated levels) for rental car staging and storage, rental car pick up and return, and Airport and car rental employee parking;
- Quick Turnaround Area for refueling, light maintenance, and washing of returned rental cars;
- Vehicle fueling positions with fueling hoses (74 total spaces projected per 2025 space requirements);
- Four 15,000 gallon fuel storage tanks (below-grade vaulted containment system);
- Trolley/shuttle to/from the passenger terminal area including a trolley/shuttle maintenance area adjacent to the trolley/shuttle stop;
- Site landscaping;
- Roadway connections to the Airport terminal roadway system;[11]
- Connections to existing utilities; and
- Flat-plate photovoltaic panels on the roof of the ready/return structure (installation by others).

Exhibit 1-4 depicts a conceptual model of the proposed ConRAC facility. **Exhibits 1-5** through **1-8** depict conceptual plans of the ground level and levels 1 through 3, respectively, for the Proposed Action; **Exhibit 1-9** depicts elevations of the proposed ConRAC facility. Heavy maintenance would continue to be provided at the existing maintenance bays. The remainder of the existing rental car facility areas would be used for overflow vehicle storage and additional administrative offices.

[11] To alleviate congestion on Keolani Place, Dairy Road, and other roadways in the vicinity of OGG, the Hawaii DOT plans to construct an airport access road from the intersection of Puunene Avenue and Kuihelani Highway to the Airport passenger terminal. The future Airport Access Road was analyzed and approved in the 1997 Kahului Airport Improvements Environmental Impact Statement. Since construction of the Airport Access Road would occur both on- and off-Airport property, the project was separated into two roadway segments and two corresponding phases. The 4,700 linear-foot segment southwest of Hana Highway (Phase I) from the intersection of Puunene Avenue to Hana Highway is the responsibility of the Hawaii DOT - Highways Division. The segment northeast of Hana Highway (Phase II) from Hana Highway to OGG is located on Airport property and is the responsibility of the HDOT-A.

Each roadway segment/phase required a separate environmental review process under NEPA. The Hawaii DOT - Highways Division documented the anticipated impacts of the Phase I segment in an EA and a Finding of No Significant Impact was issued in September 2012 by the Federal Highway Administration. Phase II is being separately designed and administered by the HDOT-A. The potential environmental impacts of Phase II were evaluated in a documented Categorical Exclusion since they were not covered in the scope of the Hawaii DOT - Highways Division EA for Phase I of the project. The FAA approved the documented Categorical Exclusion for Phase II of the Airport Access Road on May 21, 2013. Because Phase II is scheduled to be constructed and opened (December 2014) prior to completion of the proposed ConRAC facility, the ConRAC facility plans assume that the Phase II Airport Access Road would be constructed.



SOURCE: Dematteï Wong Architecture, December 4, 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2013.

EXHIBIT 1-4

NORTH (TYPICAL)

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Conceptual Model

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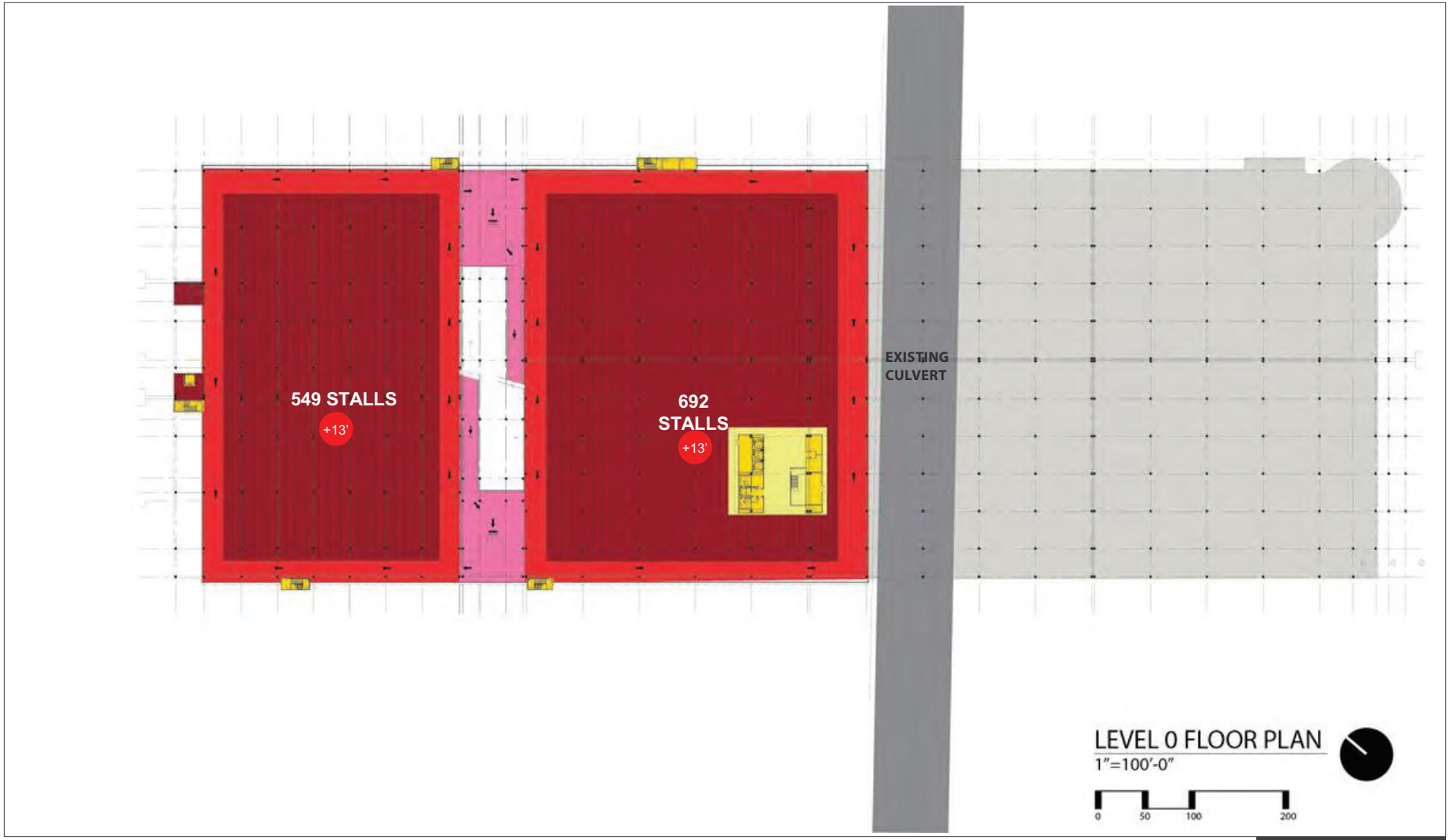

SOURCE: Demattei Wong Architecture, December 4, 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2013.

EXHIBIT 1-5

NORTH
(TYPICAL)

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Proposed Action – Ground Floor Plan

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SOURCE: Demattei Wong Architecture, December 4, 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2013.

EXHIBIT 1-6

NORTH (TYPICAL)

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Proposed Action – Level 1 Floor Plan

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SOURCE: Dattei Wong Architecture, December 4, 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2013.

EXHIBIT 1-7

NORTH (TYPICAL)

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Proposed Action – Level 2 Floor Plan

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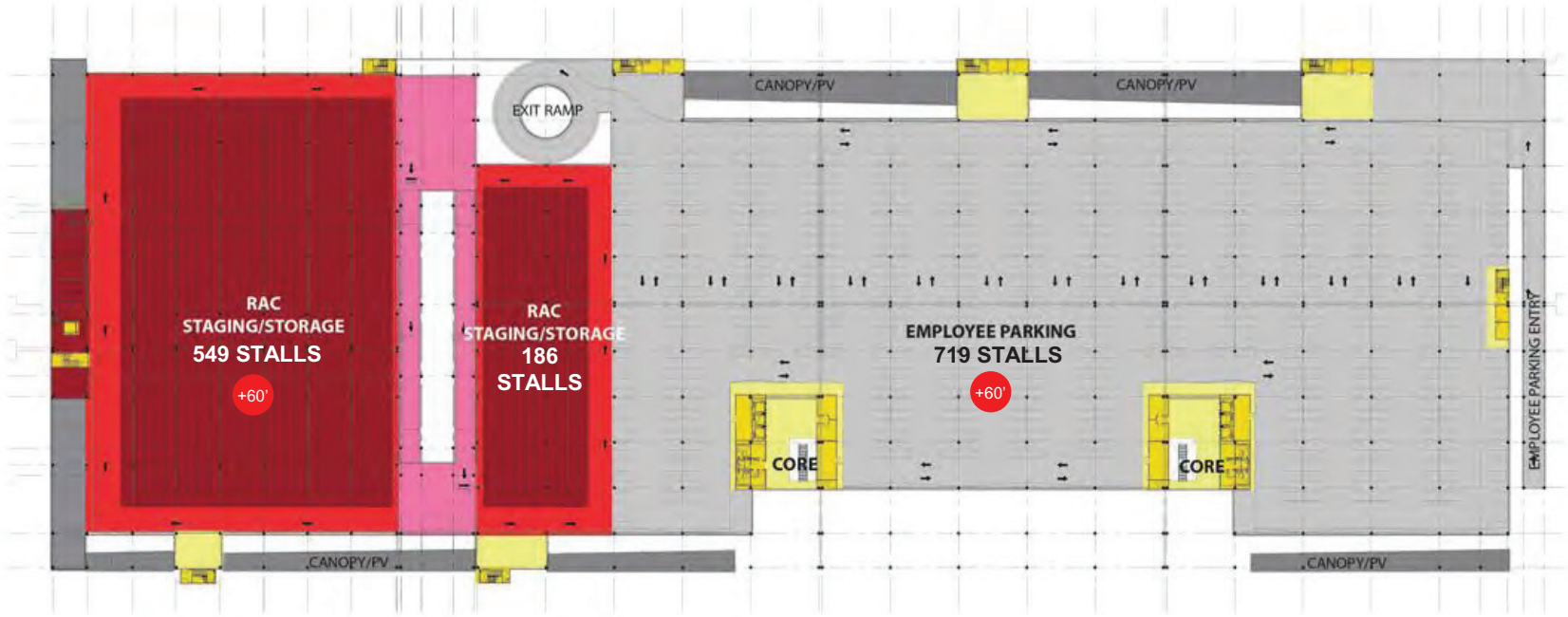

LEVEL 3 FLOOR PLAN
1"=100'-0"

0 50 100 200

SOURCE: Dematteï Wong Architecture, December 4, 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2013.

EXHIBIT 1-8

NORTH
(TYPICAL)

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Proposed Action – Level 3 Floor Plan

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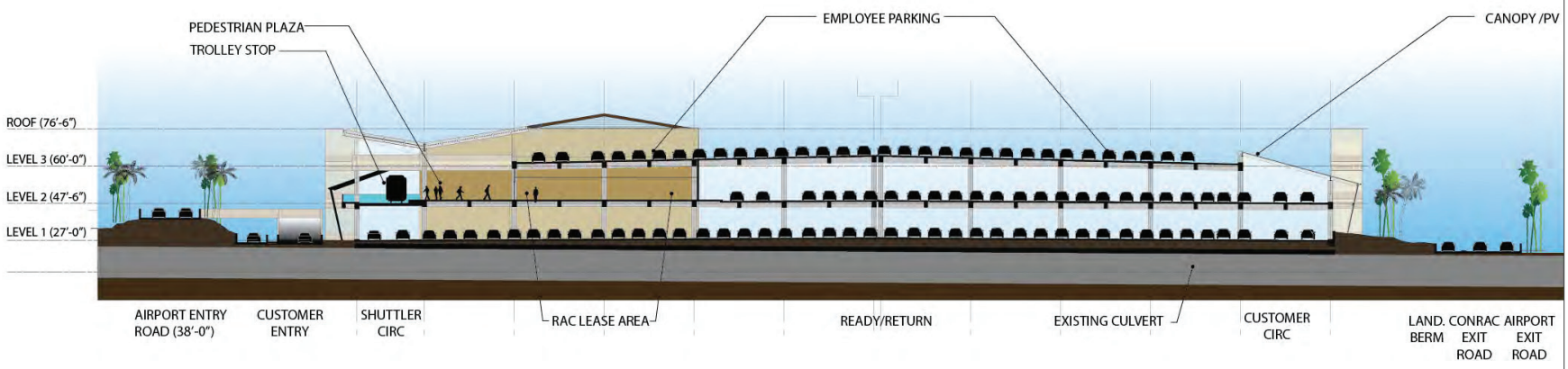
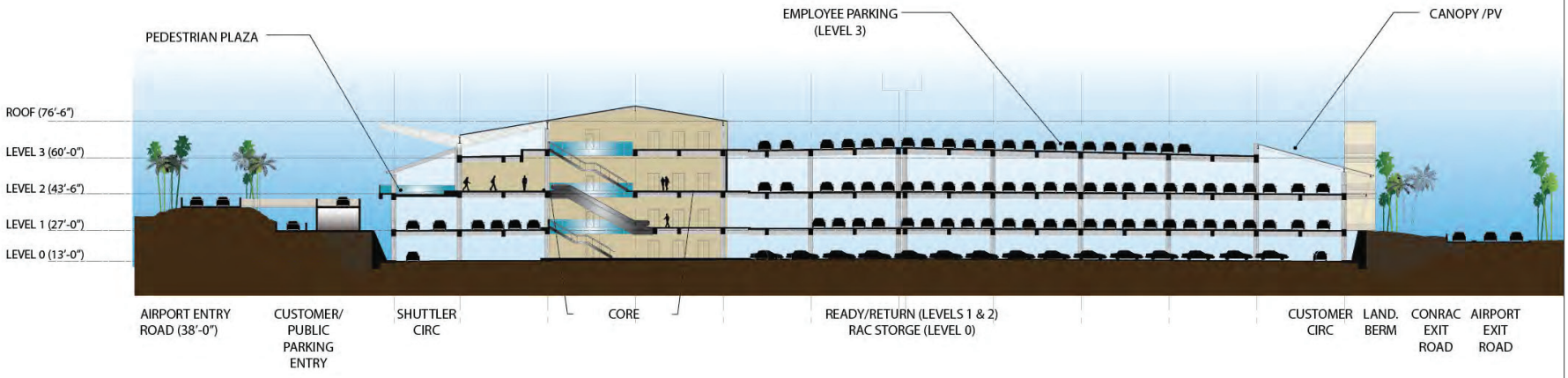
Building Section through Customer Service Building



Building Sections at Core



SOURCE: Demattei Wong Architecture, October 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2013.

EXHIBIT 1-9

NORTH (TYPICAL)

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Proposed Action – Elevations

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1.6 Requested Federal Action

The HDOT-A is requesting the following federal (FAA) actions:

- Unconditional approval of the Airport Layout Plan (ALP) for OGG depicting the proposed improvements pursuant to 49 U.S.C. 40103(b), 44718, and 47107(a)(16); Title 14, CFR Part 77 (14 CFR 77), *Safe, Efficient Use, and Preservation of the Navigable Airspace;* and 14 CFR 157, *Notice of Construction, Alteration, Activation, and Deactivation*.
- Determination under 49 U.S.C. 44502(b) that the Proposed Action is reasonably necessary for use in air commerce or in the interest of national defense.
- Continued close coordination with the HDOT-A and appropriate FAA program offices, as required, to ensure safety during construction pursuant to 14 CFR 139, *Certification of Airports,* under 49 U.S.C. 44706.

1.7 Timeframe of the Proposed Action

Construction of Proposed Action would begin upon FAA approval of this EA, if the FAA issues a favorable environmental finding and required environmental permits are obtained. Construction of the ConRAC facility is expected to take approximately 18 months. The HDOT-A anticipates that the ConRAC facility at OGG would be operational in 2015.

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2. Alternatives

2.1 Introduction

FAA Orders 1050.1E and 5050.4B set forth FAA policies and procedures to be followed in assessing the environmental impacts of aviation-related projects in compliance with NEPA and the implementing regulations (40 CFR §§ 1500-1508) issued by the Council on Environmental Quality (CEQ). These FAA orders require a thorough and objective assessment of the Proposed Action, the No Action alternative, and all reasonable alternatives that would achieve the stated purpose and need for the Proposed Action. The alternatives analysis presented in this chapter is consistent with the requirements of FAA Orders 1050.1E and 5050.4B, as well as HRS 343, which also requires consideration of alternatives to the Proposed Action.

The process followed in identifying the range of initial alternatives to be considered (Section 2.2) and the screening process used to determine which alternatives would reasonably satisfy the purpose and need for the Proposed Action (Section 2.3) are described in this chapter. Those alternatives that would satisfy the purpose and need for the Proposed Action were carried forward for analysis of environmental consequences. The applicable federal laws and regulations considered during the analysis are listed in the tables at the end of this chapter.

2.2 Identification of Potential Alternatives

This section briefly describes the potential alternatives and discloses the reasoning for selecting or not selecting the alternatives to be carried forward for detailed analysis. Alternative site locations for the proposed ConRAC facility both on and off Airport property were evaluated.

2.2.1 NO ACTION ALTERNATIVE

The No Action Alternative would not change the locations or sizes of the rental car facilities at the Airport. Rental car companies would continue to operate as they do today, including using the existing overflow/storage lot and other temporary areas at various locations around the Airport on an as-needed basis for overflow vehicle storage. Evaluation of the No Action Alternative is required by 40 CFR § 1502.14(d).

2.2.2 OFF-AIRPORT ALTERNATIVES

Limited space is available north of the Airport, which consists of a narrow strip of vegetated land, beaches including Kanahā Beach Park, and Kahului Bay. Areas to the north of the Airport would require land

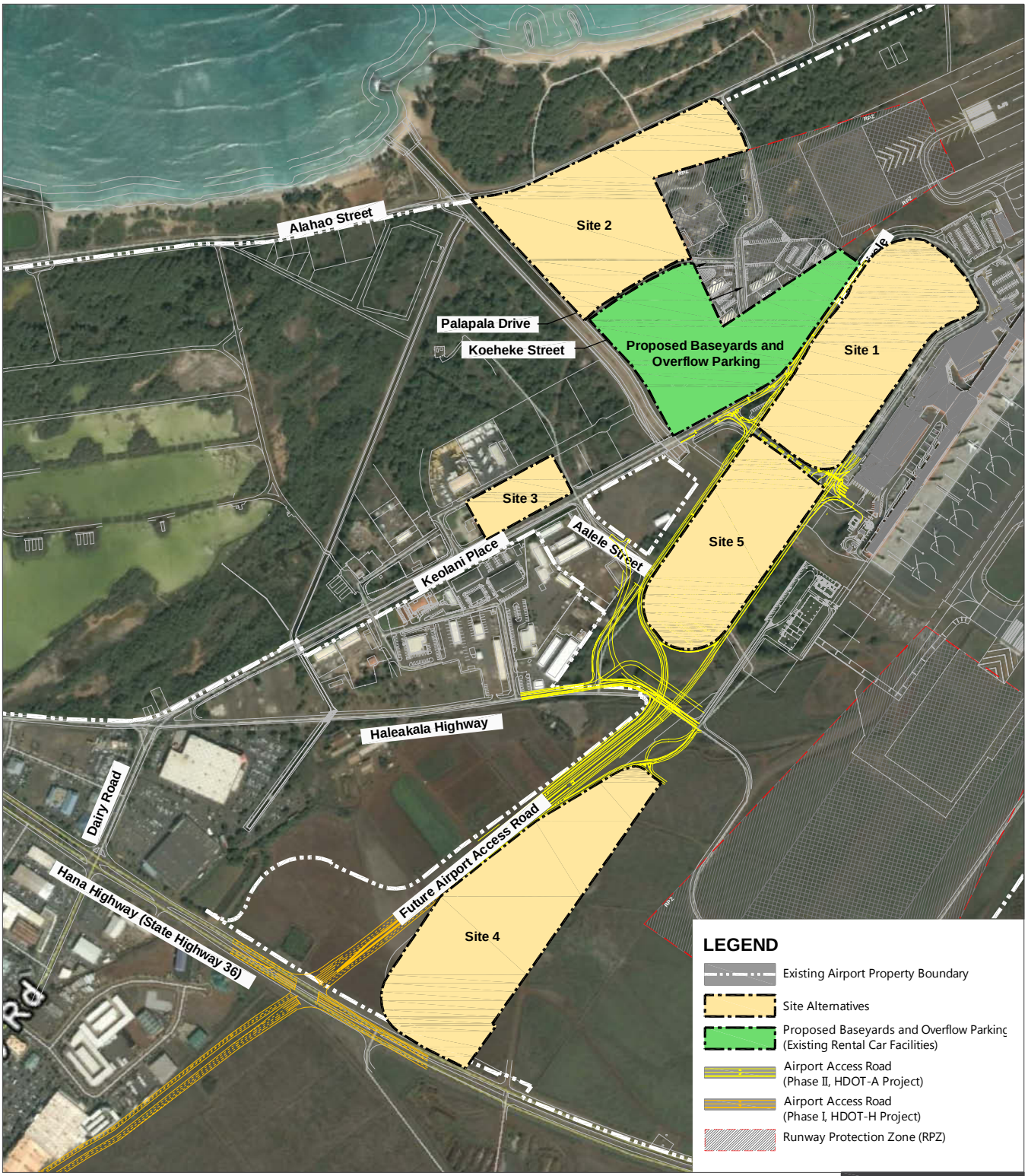
acquisition to accommodate the facilities needed to meet the demand for rental car facilities. Land uses east and south of the Airport consist of sugarcane fields and construction of access roads and utilities would be required. These locations would result in longer travel times between the passenger terminal and the ConRAC facility. Areas immediately west of the Airport consist of the Kanahā Pond State Wildlife Sanctuary as well as areas that are already developed with commercial land uses; farther west, residential uses are prevalent. The designation of a State wildlife sanctuary and developed status of surrounding areas would make these locations infeasible for an off-Airport alternative.

2.2.3 ON-AIRPORT ALTERNATIVES

On-Airport locations for the proposed ConRAC facility were determined by identifying available Airport property and evaluating the feasibility of development. Five on-Airport site alternatives were identified and evaluated as potential locations for the ConRAC facility. In all alternatives, the existing rental car company facilities would continue to be used as baseyards for heavy maintenance, additional administrative offices, and overflow parking for rental cars. **Exhibit 2-1** shows the locations of Alternative Sites 1 through 5, as well as where the baseyards and overflow parking would be located.

2.2.3.1 Alternative Site 1

Site 1 consists of just over 20 acres and is located on the site of the existing public parking lot, across the street from the passenger terminal (see **Exhibit 2-2**). This site would include a CSB, a two-level ready/return structure, and a one- or two-level QTA area to accommodate the projected rental car facility requirements identified in Table 1-2. Additional parking would be required southwest of the site to replace the parking that would be displaced by the ConRAC facility. The CSB would be located on the southeastern side of the site, facing the main passenger terminal. The site's proximity to the passenger terminals would enable passengers to walk between the two facilities, limiting, and potentially eliminating, busing operations and increasing convenience for rental car customers. In addition, no trolley/shuttle or other transportation mode would be necessary. Returning rental car customers would use the terminal frontage roadways to access the ConRAC facility (see **Exhibit 2-3**).



SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-1

NORTH 0 900 ft.

Alternative Sites 1 Through 5

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 2-1 Potential ConRAC Sites_P-2007.dwg_Layout: EA Ex 2-1_Sep 06, 2013, 12:09pm

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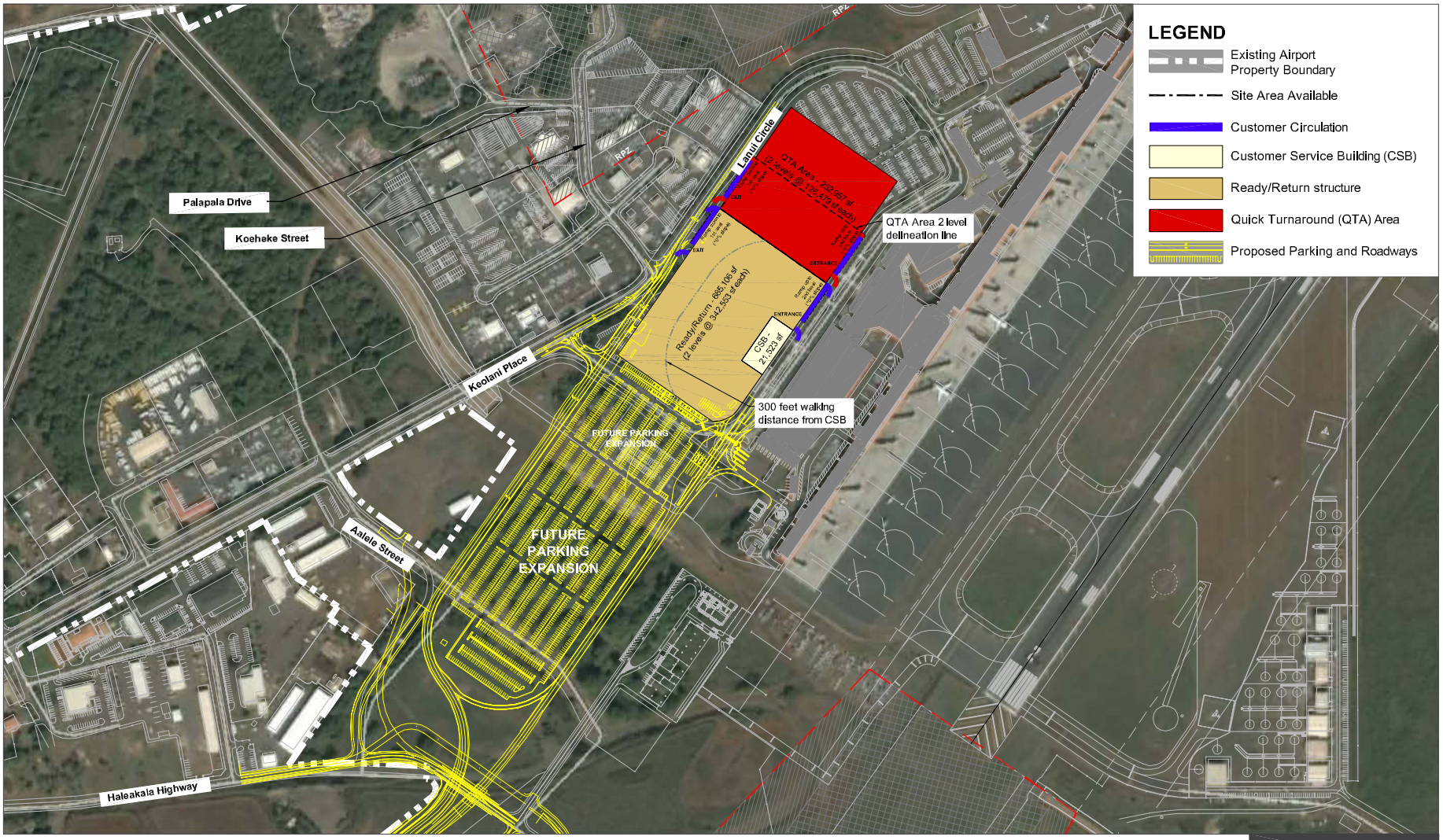

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-2

NORTH 0 600 ft.

Alternative Site 1

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Exhibit 2 - Alt 1.dwg_Layout: Ex 2-2_Sep 06, 2013, 12:38pm

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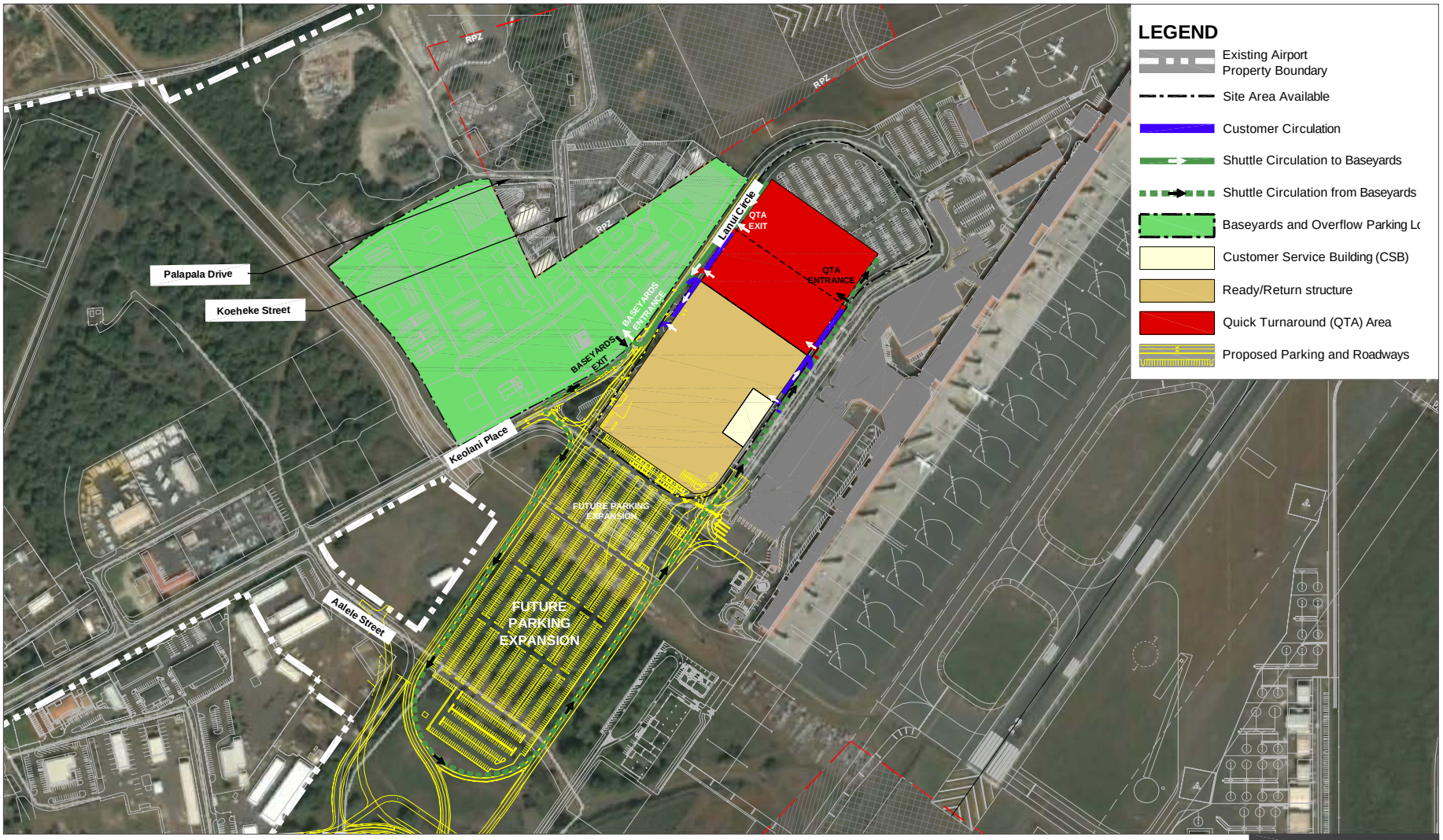

Sources: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
Prepared by: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-3

NORTH 0 600 ft.

Alternative Site 1 Rental Car Customer and Shuttle Routes

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Site 1 is located entirely within the Special Management Area (SMA) regulated under the Hawaii Coastal Zone Management (CZM) Program.[1] It is also partially located within a designated tsunami evacuation area.

2.2.3.2 Alternative Site 2

Site 2, encompassing just over 22 acres, is located along Alahao Street, north and west of the runway protection zone (RPZ) associated with the Runway 5 end of Runway 5-23 (see **Exhibit 2-4**). An Airport drainage ditch, the Kalialinui Gulch, is located on the western border of the site, and the existing rental car facilities are located to the south. Currently, some rental car overflow parking occurs within portions of Site 2. This site would include a CSB, a two-level ready/return structure, and a one- or two-level QTA structure to accommodate the projected rental car facility requirements identified in Table 1-2. Because of the distance between the proposed CSB and the main passenger terminal building, passengers would not be able to walk between the two facilities.

Busing would be required between the passenger terminals and a ConRAC facility located at this site. Shuttle buses would use Palapala Drive, Koeheke Street, and Lanui Circle to transport rental car customers between the passenger terminals and the ConRAC facility (see **Exhibit 2-5**). Rental car customers exiting the ConRAC facility and returning to the facility would need to use either Keolani Place or the terminal frontage roadways. Site 2 is located entirely within the SMA, a designated tsunami evacuation area, and a 100-year floodplain, as designated by the Federal Emergency Management Agency (FEMA) and shown on the Flood Insurance Rate Maps (FIRMs).

2.2.3.3 Alternative Site 3

Site 3, consisting of approximately 4 acres, is located on Keolani Place, where Enterprise Rent-A-Car is currently located (see **Exhibit 2-6**). To accommodate the projected rental car facility requirements identified in Table 1-2, the ConRAC facility at this site would include a two-level CSB, a nine-level ready/return structure, and a nine-level QTA structure. The exit and entrance for rental car customers would be located directly on Keolani Place, which would allow some customers to avoid the terminal roadway system.

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[1] The State of Hawaii Office of Planning administers HRS Chapter 205A, the CZM Program, to "provide for the effective management, beneficial use, protection, and development of the Coastal Zone." Under the Hawaii CZM Program, the SMA is a specially carved out section of the coastal zone drawn up by each county to control development within an area along the shoreline "…to avoid permanent losses of valuable resources and the foreclosure of management options, and to ensure that adequate access, by dedication or other means, to public owned or used beaches, recreation areas, and natural reserves is provided." The legislature also declares that "it is the state policy to preserve, protect, and where possible, to restore the natural resources of the coastal zone of Hawaii." The 1975 Shoreline Protection Act established the SMA permitting system as a management tool to assure that developments in the SMA are designed and carried out in compliance with the CZM objectives, policies, and SMA guidelines. The SMA permit regulates permissible land uses that are already allowed by land use policies including zoning designations, county general plans, and community development plans. The Maui Planning Department administers SMA permits and shoreline setback provisions in the County of Maui.

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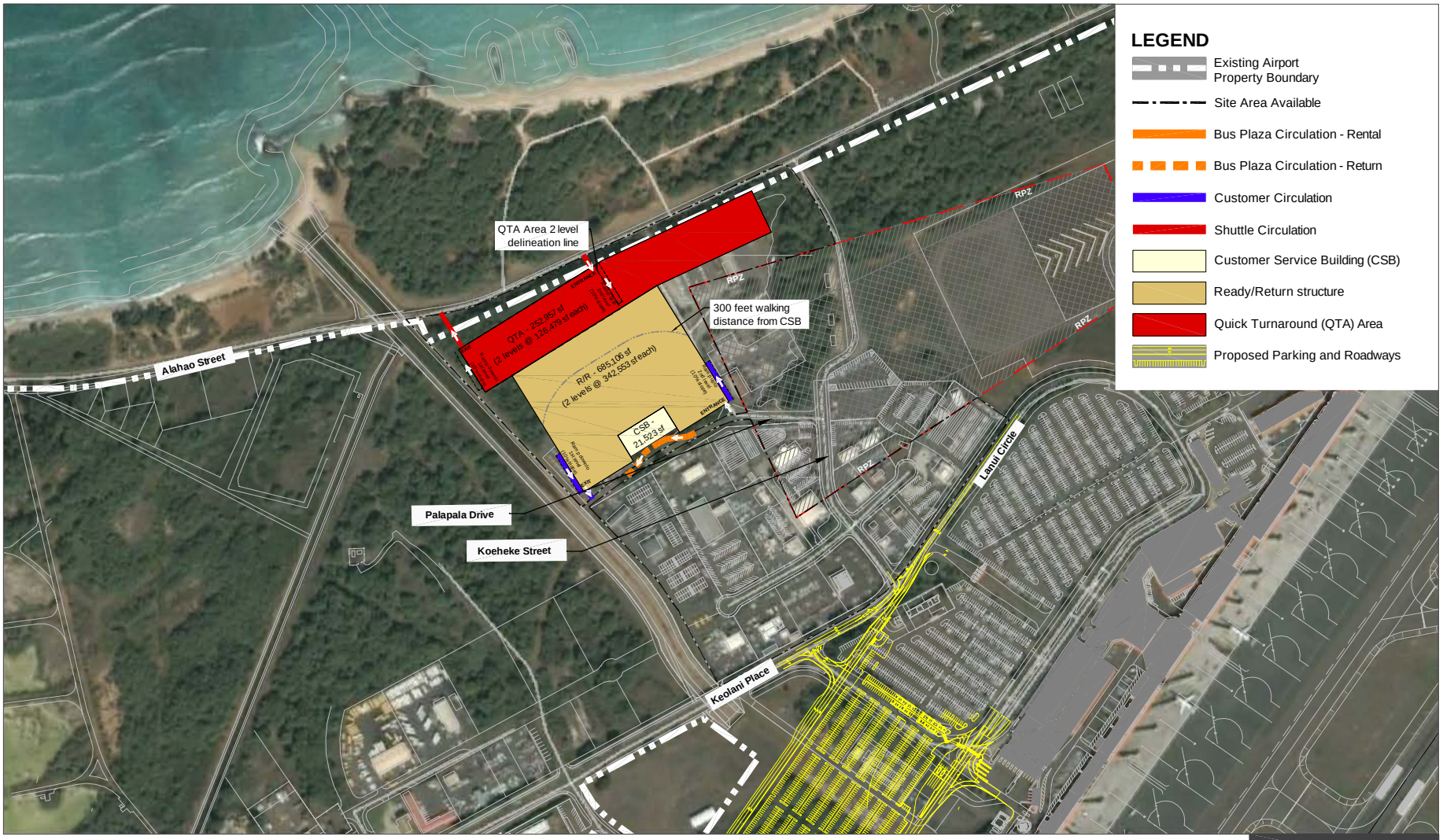

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-4

NORTH 0 600 ft.

Alternative Site 2

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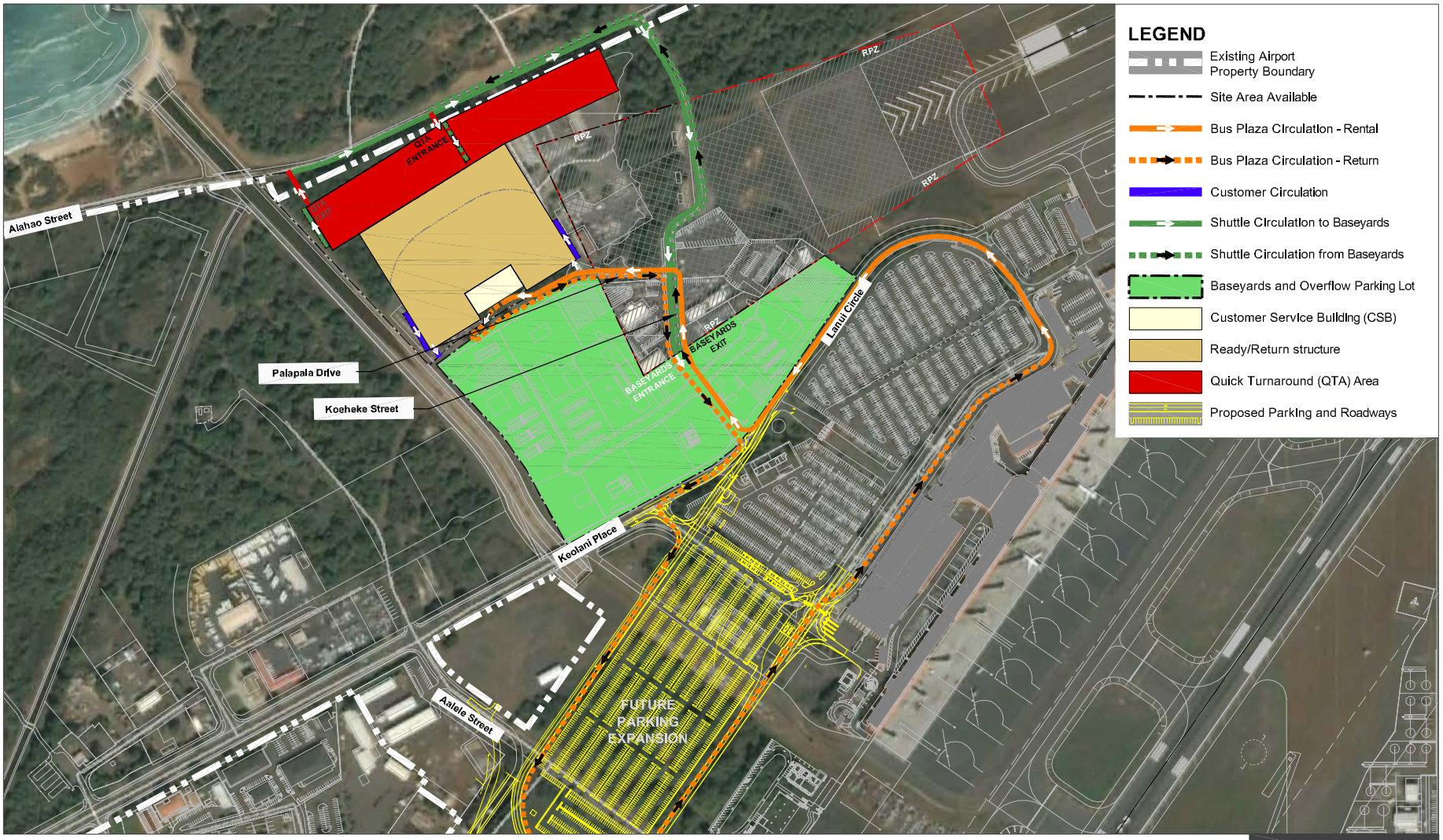

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii,Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-5

NORTH 0 600 ft.

Alternative Site 2 Rental Car Customer and Shuttle Routes

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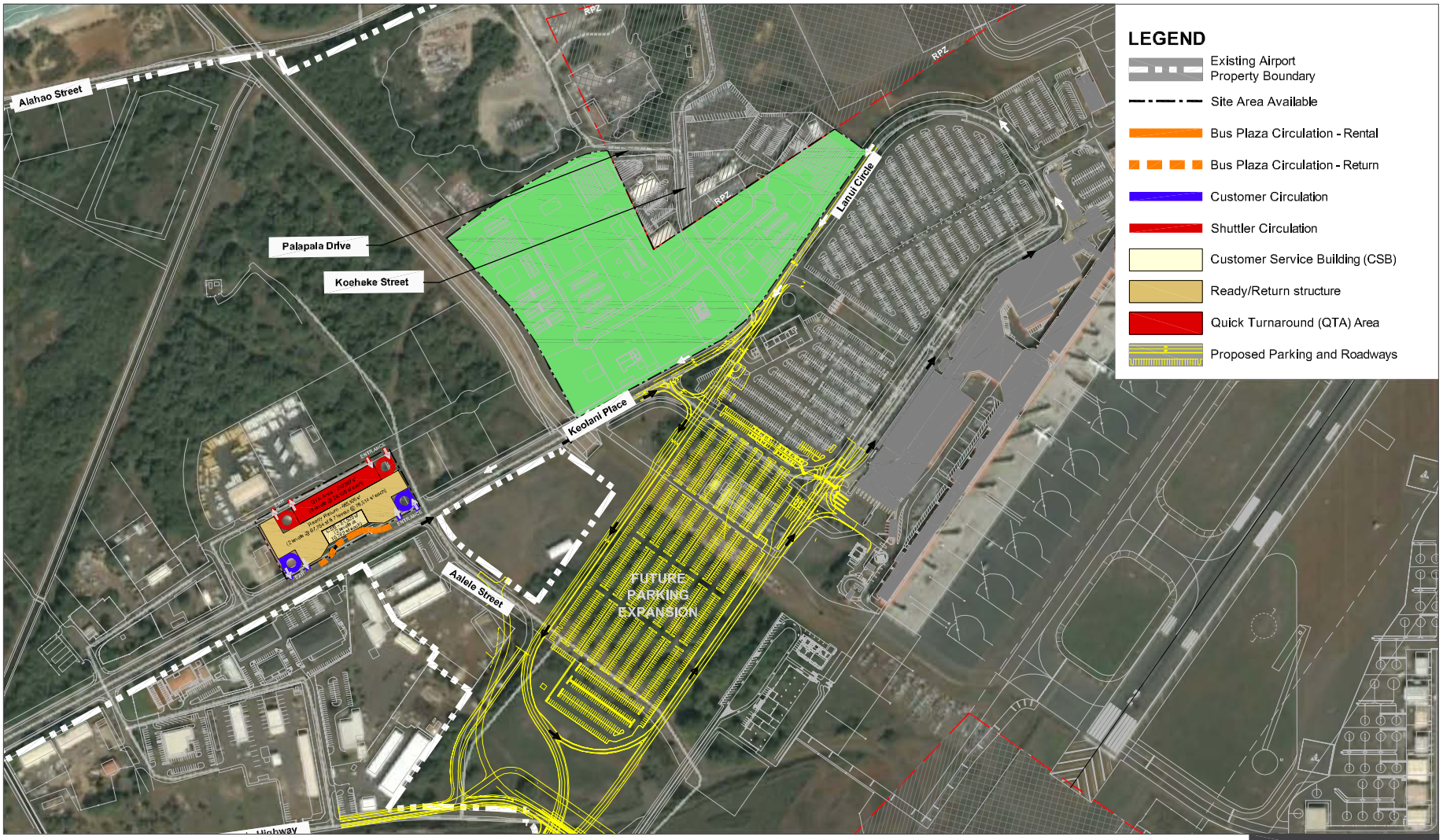

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-6

NORTH 0 600 ft.

Alternative Site 3

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As shown on **Exhibit 2-7**, the majority of rental car customers would most likely enter and exit the Airport via the future Airport Access Road, which would necessitate circulating through the terminal roadway system to access this site. A shuttle bus would be required between the passenger terminals and a ConRAC facility located at this site. Shuttle buses would access the terminal via Keolani Place, and circle around the existing public parking lot. Site 3 is located entirely within the SMA, a designated tsunami evacuation area, and partially within a FEMA-designated 100-year floodplain.

2.2.3.4 Alternative Site 4

Site 4 consists of just over 27 acres at the northeast corner of the intersection of Hana Highway and the future Airport Access Road (see **Exhibit 2-8**). Alternative Site 4 is located outside of the SMA, designated tsunami evacuation area, and FEMA-designated 100-year floodplain. Alternative Site 4 would include a CSB, a two-level ready/return structure, and a QTA area to accommodate the projected rental car facility requirements identified in Table 1-2. This alternative would require the construction of additional roads to serve the ready/return and the QTA area entrances and exits. Given the physical distance between this site and the passenger terminal buildings, a shuttle system would be required.

Exiting and returning rental cars would not be required to circulate through the terminal roadway system, which would reduce traffic and congestion at the Airport terminal curbs (see **Exhibit 2-9**). Alternative Site 4 provides additional space for future expansion of the ConRAC facility or overflow parking for rental cars.

2.2.3.5 Alternative Site 5

Site 5 consists of approximately 17 acres southwest of the existing public parking lot (see **Exhibit 2-10**); the site was designated for public parking expansion in the 1997 Environmental Impact Statement (EIS).[2] Site 5 is located within the current SMA and FEMA-designated 100-year floodplain. Alternative 5 would include a CSB, a two-level ready/return structure with a third level for additional rental car staging and storage and Airport employee parking, and a QTA facility at-grade to accommodate the projected rental car facility requirements identified in Table 1-2. The third level above the at-grade QTA facility would accommodate approximately 719 Airport employee and 400 rental car staging and storage parking spaces. The CSB would face the existing public parking lot and a trolley/shuttle system would transport passengers to and from the passenger terminals (to a stop located across the street from the terminal). Exiting and returning rental cars would not be required to circulate through the terminal roadway system, which would reduce traffic and congestion at the Airport terminal curbs.

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[2] U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii,* September 1997.

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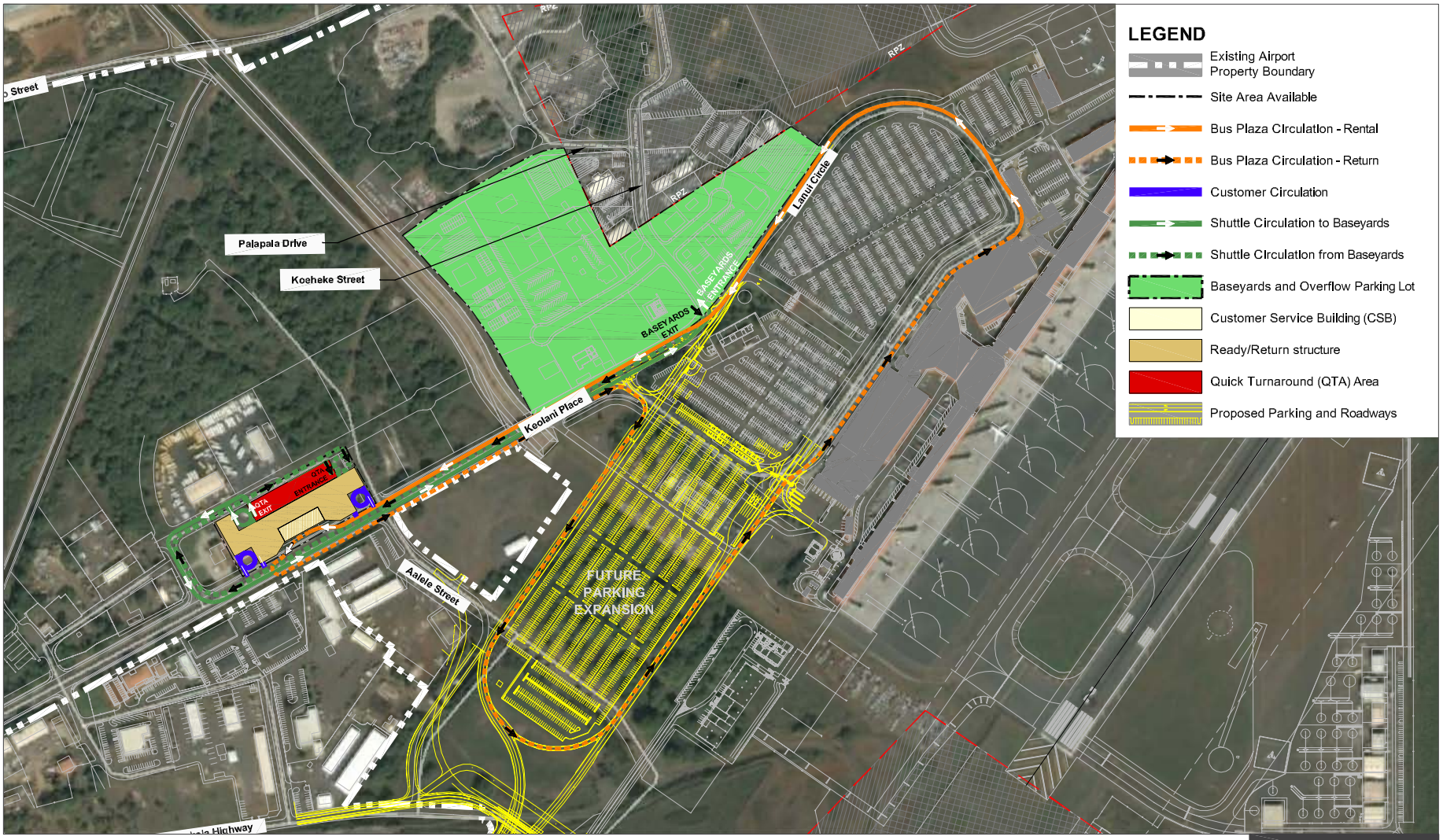

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-7

NORTH 0 600 ft.

Alternative Site 3 Rental Car Customer and Shuttle Routes

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SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-8

NORTH 0 600 ft.

Alternative Site 4

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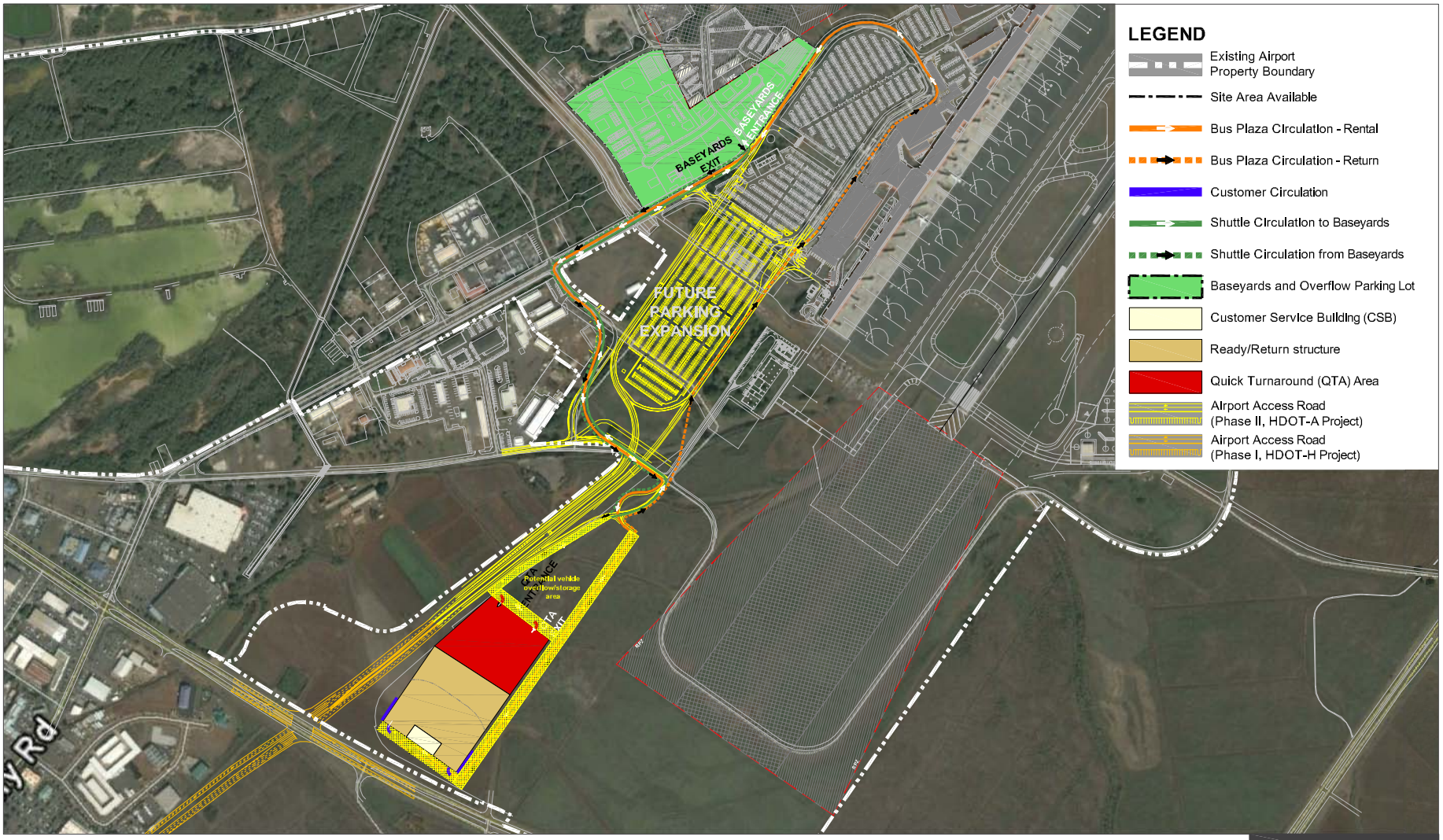

Sources: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
Prepared by: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-9

NORTH 0 1,000 ft.

Alternative Site 4 Rental Car Customer and Shuttle Routes

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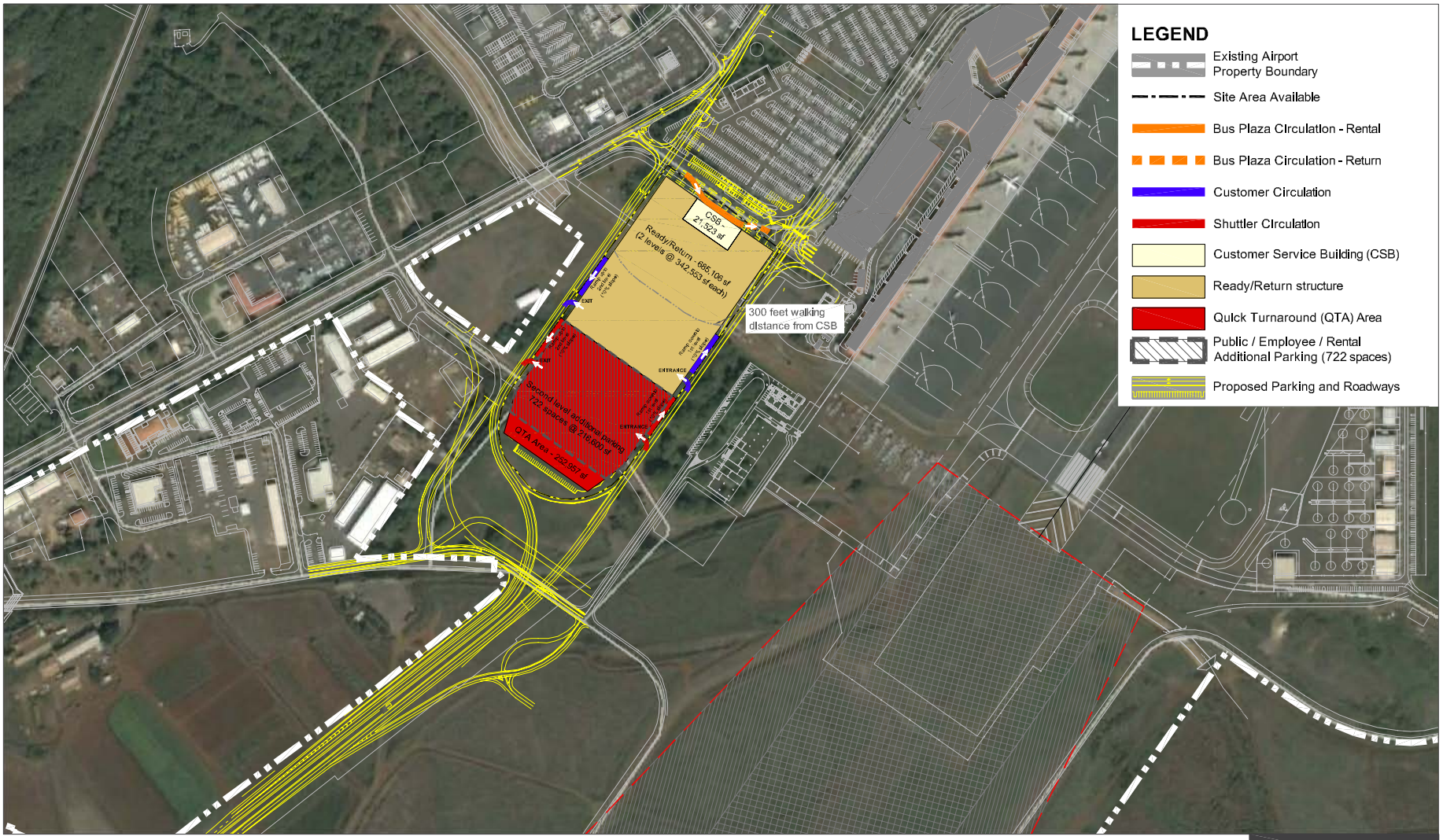

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 2-10

NORTH 0 600 ft.

Alternative Site 5

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2.3 Evaluation of Alternatives

The ability of each alternative to meet the stated purpose and need for the Proposed Action is documented in this section, along with a conclusion regarding the retention of each alternative for further consideration of potential environmental consequences.

2.3.1 EVALUATION CRITERIA

Each alternative was primarily evaluated based on the purpose and need discussed in Chapter 1, "Purpose and Need." To address current issues at the Airport, the preferred alternative must meet the following criteria:

- Provide adequate on-Airport facilities for the rental car companies.
- Reduce traffic and congestion on the terminal roadway system.
- Enhance the overall customer experience.

Additional explanation of these criteria and how they were applied during the alternatives evaluation process for this EA is presented below.

- **Provide Adequate on-Airport Facilities for the Rental Car Companies:** The distance between the ConRAC facility and the baseyards was evaluated, whether or not the facility would accommodate the projected ConRAC facility requirements (as identified in Table 1-2) was assessed, and the operational efficiency of each alternative (i.e., the ability of each rental car company to maintain a contiguous and secure operation on one floor) was estimated. Each alternative was evaluated to determine if it would accommodate adequate facilities to accommodate projected rental car facility requirements in a cost effective manner.
- **Reduce Traffic and Congestion on the Terminal Area Roadways:** Whether or not the alternative would eliminate the need for rental car customers to circulate through the terminal roadway system, which would lead to a reduction in traffic congestion on the terminal roadway system, was evaluated.
- **Enhance the Overall Customer Experience:** Travel times, walking distances, and wayfinding for rental car customers were evaluated. The overall customer experience is a combination of the three features of travel time, walking distance, and wayfinding. Customer travel times were evaluated based on the time it would take to travel between the ConRAC facility and the passenger terminals. Walking distances were evaluated based on the estimated distance customers would be required to walk within the ConRAC facility to and from the customer service areas. Customer wayfinding was evaluated based on the relative ease for returning customers to find their way back to the ConRAC facility (driving).

2.3.2 EVALUATION RESULTS

The alternatives were evaluated based on the criteria described above.

2.3.2.1 No Action Alternative

No changes to the existing rental car facilities at OGG would be implemented under the No Action Alternative. The rental car companies would continue to use their existing facilities, and they would be unable to expand to better accommodate projected demand for rental car facilities at OGG over the short- or long-term. Customers would experience increased delays and congestion while picking up or returning rental cars. Additionally, once the future Airport Access Road is constructed, all customers returning rental cars would continue to need to circulate through the terminal roadway system. Although the No Action Alternative does not meet the purpose and need for the proposed project, it was retained for further consideration as required by 40 CFR § 1502.14(d) and paragraph 706(d) of FAA Order 5050.4B..

2.3.2.2 Off-Airport Alternatives

No viable off-Airport locations were identified to provide adequate facilities to accommodate projected rental car facility requirements, reduce traffic and congestion on the Airport terminal roadway system, or enhance the overall customer experience by reducing the length of trip required or wait and travel times for shuttle buses. Therefore, off-airport alternatives would not meet the purpose and need for the proposed project. In addition, all off-Airport sites would require land acquisition which would make the cost of a ConRAC facility prohibitively expensive. Because viable on-Airport alternatives were identified that meet the purpose and need for the proposed project, off-Airport alternatives were eliminated from further consideration.

2.3.2.3 On-Airport Alternatives

The evaluation of the five on-Airport site alternatives identified in Section 2.2.3 is summarized in this section.

Alternative Site 1

Alternative Site 1 would require the construction of a two-level structure to accommodate the required facilities. This site is in close proximity to the passenger terminals, and would be accessible to pedestrians, resulting in decreased traffic and congestion on the terminal roadways because the use of rental car shuttle buses would not be required. This alternative, however, would not reduce congestion from rental cars on the terminal roadways, as rental car customers would need to use Lanui Circle to access the site for both picking up and dropping off cars. While this alternative would provide a convenient location for rental car customers, Alternative Site 1 would displace existing public and employee parking to the south lot and would inconvenience all passengers and employees using the relocated parking facilities.

Location of the ConRAC facility at Site 1 would not reduce roadway congestion, as rental car customers would be required to circulate through the Airport roadway system. This alternative would not enhance the overall customer experience, as it would require relocation of existing public parking and would require construction of a multilevel structure immediately across the street from the passenger terminals, affecting views from the terminal area. Therefore, Alternative Site 1 was eliminated from further consideration.

Alternative Site 2

Alternative Site 2 would require the construction of a two-level structure to accommodate the required facilities. This alternative would displace current overflow rental car parking. Site 2, located along Alahao Street, is not particularly convenient because it would make wayfinding for returning rental car customers more complex. Rental car operational efficiency would be roughly equivalent to existing conditions because the distance between this site and the existing baseyards is relatively short. Rental car customers would need to use the terminal roadways to gain access to Site 2, which would not alleviate terminal roadway traffic. The location of Site 2 would not allow for pedestrian access to the passenger terminals; therefore, shuttle buses would be required for customer access to the terminals.

Location of the ConRAC facility at Site 2 would not reduce roadway congestion as rental car customers would be required to circulate through the Airport roadway system. This alternative would not enhance the overall customer experience, as it would be located farther from the passenger terminals and would make wayfinding more difficult. Therefore, Alternative Site 2 was eliminated from further consideration.

Alternative Site 3

Alternative Site 3 would require the construction of a nine-level structure to accommodate projected rental car facility requirements at the Airport. The location of the ConRAC facility at this site would displace the existing Enterprise Rent-A-Car facilities; the Enterprise maintenance facilities, overflow parking, and, possibly, additional administrative space would need to be located elsewhere on Airport property. The exit from and entrance to this facility for rental car customers would be located on Keolani Place, which would reduce some traffic on terminal roadways, but the majority of rental car customers would use the future Airport Access Road, which would require them to circulate through the terminal roadway system. This site would not be accessible to pedestrians; therefore, rental car customers would be required to use shuttle buses to access the ConRAC facility. The rental car company shuttles would access the terminal via Keolani Place, and circle around the existing public parking lot, contributing to Airport roadway traffic, similar to existing conditions.

Site 3 would be the most expensive of the alternatives evaluated because of the high cost of constructing a nine-story structure to fit the required facilities on this site, and because some of the existing Enterprise Rent-A-Car facilities would have to be relocated. Location of the ConRAC facility at Site 3 would not reduce roadway congestion, as most rental car customers would circulate through the Airport roadway system. This alternative would not enhance the overall customer experience because of the distance of the site from the passenger terminal. Therefore, Alternative Site 3 was eliminated from further consideration.

Alternative Site 4

Alternative Site 4 would provide the largest area for the proposed ConRAC facility and would include a two-level ready/return structure and provide additional space for future rental car facility expansion and vehicle storage. Additional roadway and utility improvements would be needed to support the site. Because of its location, Alternative Site 4 would allow customers to access the ConRAC facility before entering the Airport terminal roadway, reducing roadway traffic in the terminal area. However, customers would be required to use shuttle bus service to and from the new ConRAC facility. While Alternative Site 4 is located at a convenient major intersection and would be the easiest for rental car customers to find, it is also located farthest from the passenger terminals.

Alternative Site 4 would reduce roadway congestion as rental car customers would not be required to circulate through the Airport roadway system. This alternative does not meet the third evaluation criteria of enhancing overall customer experience. Alternative Site 4 does not meet the component for travel times or walking distances because of its distance to the passenger terminal. Therefore, Alternative Site 4 was eliminated from further consideration.

Alternative Site 5

Alternative Site 5 would require the construction of a two-level structure to accommodate the required facilities; however, a third level is proposed to provide additional area for rental car staging and storage and Airport employee parking. This site is identified on the current Airport Layout Plan (ALP) as accommodating additional Airport parking; therefore, under this alternative, additional parking would be incorporated into the ConRAC facility project. The proximity of this site to the passenger terminals would reduce trip distance on a trolley/shuttle system, which would increase passenger convenience. Exiting and returning rental car customers would not circulate through the passenger terminal roadway system, reducing traffic congestion at terminal curbs and improving traffic flows.

Location of the ConRAC facility at Alternative Site 5 would provide adequate on-Airport facilities, reduce roadway congestion, and enhance the overall customer experience because of its proximity to the passenger terminal, walking distances within the facility, and ease of wayfinding; thus, Alternative Site 5 was retained for further consideration.

2.4 Alternatives Retained for Analysis and Identification of the Proposed Action

Table 2-1 summarizes the results of the alternatives evaluation. Based on the evaluation of alternatives, two alternatives were retained for evaluation in this EA:

- No Action Alternative
- Alternative Site 5

Of these two alternatives, only Alternative Site 5 meets the purpose and need identified in Chapter 1; therefore, construction and operation of the proposed ConRAC at Alternative Site 5 was identified as the Proposed Action in this EA. Although the No Action Alternative would not meet the stated purpose and need for the Proposed Action, it was retained for further consideration in this EA to comply with Title 40 CFR § 1502.14(d), which requires consideration of the no action alternative and to comply with FAA Order 1050.1E. Thus, No Action and the Proposed Action (Alternative Site 5) are analyzed in this EA.

Table 2-1 Summary of Alternatives Evaluation

ALTERNATIVE	PROVIDES ADEQUATE ON-AIRPORT FACILITIES	REDUCES TRAFFIC CONGESTION	ENHANCES OVERALL CUSTOMER EXPERIENCE	RETAINED FOR FURTHER CONSIDERATION
No Action Alternative	No	No	No	Yes 1/
Off-Airport Alternatives	No	No	No	No
On-Airport Alternatives				
Alternative Site 1	Yes	No	No	No
Alternative Site 2	Yes	No	No	No
Alternative Site 3	No	No	No	No
Alternative Site 4	Yes	Yes	No	No
Alternative Site 5	Yes	Yes	Yes	Yes

NOTES:

1/ Although the No Action Alternative does not meet the purpose and need for the proposed project, it was retained for further consideration as required by 40 CFR § 1502.14(d) and paragraph 706(d) of FAA Order 5050.4B.

SOURCES: Ricondo & Associates, Inc., July 2012; Ricondo & Associates, Inc., *Kahului Airport Consolidated Rental Car Facility Site Location Study,* August 2, 2011.

PREPARED BY: Ricondo & Associates, Inc., July 2012.

2.5 Sponsor's Preferred Alternative

The Proposed Action, construction and operation of a consolidated rental car facility at Alternative Site 5, as identified in Section 2.4, is the Sponsor's preferred alternative.

2.6 Federal Laws and Regulations Considered

In accordance with FAA Order 1050.1E, Paragraph 405(d)(4), the relevant federal laws and statutes, executive orders, and other federal regulations considered during preparation of this EA are listed in **Table 2-2**, **Table 2-3**, and **Table 2-4**, respectively.

Table 2-2 Federal Laws and Statutes Considered

	CITATION
National Environmental Policy Act of 1969	42 U.S.C. 4321 *et seq.*
Clean Air Act of 1970, as amended	42 U.S.C. 7401 *et seq.*
Department of Transportation Act of 1966, Section 4(f)	49 U.S.C. 303(c)
Airport and Airway Improvement Act of 1982, as amended	49 U.S.C. 47101 *et seq.*
Airport Noise and Capacity Act of 1990	49 U.S.C. 4752 *et seq.*
Aviation Safety and Noise Abatement Act of 1979	49 U.S.C. 47501 *et seq.*
Federal Aviation Act of 1958, as amended	49 U.S.C. 40101 *et seq.*
Endangered Species Act of 1973	16 U.S.C. 1531 *et seq.*
Fish and Wildlife Coordination Act of 1958	16 U.S.C. 661 *et seq.*
Magnuson-Stevens Fishery Conservation and Management Act of 1976, as amended	16 U.S.C. 1801 *et seq.*
Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Community Environmental Response Facilitation Act of 1992	42 U.S.C. 6901 *et seq.*
Resource Conservation and Recovery Act of 1976, as amended by the Solid Waste Disposal Act of 1980	42 U.S.C. 6901 *et seq.*
National Historic Preservation Act of 1966, as amended	16 U.S.C. 470 *et seq.*
Archaeological and Historic Preservation Act of 1974, as amended	16 U.S.C. 469 *et seq.*
Land and Water Conservation Fund Act of 1965	16 U.S.C. 4601 *et seq.*
Federal Water Pollution Control Act of 1972, as amended (commonly referred as the Clean Water Act)	33 U.S.C. 1251 *et seq.*
Rivers and Harbors Act of 1899, Section 10	33 U.S.C. 403 *et seq.*
Farmland Protection Policy Act	7 U.S.C. 4201 *et seq.*
Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970	42 U.S.C. 4601 *et seq.*
Wild and Scenic Rivers Act of 1968	16 U.S.C. 1271 *et seq.*
Toxic Substances Control Act	15 U.S.C. 2601 *et seq.*
Coastal Zone Management Act of 1972	16 U.S.C. 1452 *et seq.*
Oil Pollution Control Act of 1990	33 U.S.C. 2701 *et seq.*

SOURCE: Ricondo & Associates, Inc., September 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2012.

Table 2-3 Executive Orders Considered

	CITATION
Executive Order 11593, *Protection and Enhancement of the Cultural Environment*	36 Federal Register (FR) 8921
Executive Order 11988, *Floodplain Management*	43 FR 6030
Executive Order 11990, *Protection of Wetlands*	42 FR 26961
Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*	59 FR 7629
Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*	62 FR 19883

SOURCE: Ricondo & Associates, Inc., September 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2012.

Table 2-4 FAA Orders, Advisory Circulars, and Other Federal Regulations Considered

U.S. Department of Transportation (DOT) and FAA Orders
U.S. DOT, FAA Order 1050.1E: *Environmental Impacts: Policies and Procedures*
U.S. DOT, FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*
U.S. DOT, Order 5650.2: *Floodplain Management and Protection*
U.S. DOT, Order 5680.1: *Final Order to Address Environmental Justice in Low-Income and Minority Populations*
U.S. DOT, Order 5660.1A: *Preservation of the Nation's Wetlands*
FAA Advisory Circulars
U.S. DOT, FAA Advisory Circular 150/5020-1: *Noise Control and Compatibility Planning for Airports*
U.S. DOT, FAA Advisory Circular 150/5200-33A: *Hazardous Wildlife Attractants on or near Airports*
U.S. DOT, FAA Advisory Circular 36-3H: *Estimated Airplane Noise Levels in A-Weighted Decibels*
U.S. DOT, FAA Advisory Circular 150/5300-13A, *Airport Design*
U.S. DOT, FAA Advisory Circular 150/5370-10A: *Standards for Specifying Construction of Airports*
Code of Federal Regulations
Title 14 CFR Part 71: *Designation of Class A, Class B, Class C, Class D, and Class E Airspace Areas; Airways; Routes; and Reporting Points*
Title 14 CFR Part 77: *Safe, Efficient Use, and Preservation of the Navigable Airspace*
Title 14 CFR Part 135: *Operating Requirements: Commuter and On-Demand Operations and Rules Governing Persons on Board Such Aircraft*
Title 14 CFR Part 150: *Airport Noise Compatibility Planning*
Title 40 CFR Part 93: *Determining Conformity of Federal Actions to State or Federal Implementation Plans, Subpart B*
Title 40 CFR Part 122: *EPA Administered Permit Programs: The National Pollutant Discharge Elimination System*
Title 40 CFR Part 123: *State Program Requirements*
Title 40 CFR Part 124: *Procedures for Decisionmaking*
Title 40 CFR Part 172: *Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements*
Title 40 CFR Parts 1500-1508: *President's Council on Environmental Quality*

SOURCE: Ricondo & Associates, Inc., July 2013.
PREPARED BY: Ricondo & Associates, Inc., July 2013.

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3. Affected Environment

The affected environment for the proposed ConRAC facility and associated projects encompasses those areas that would be directly or indirectly affected by the Proposed Action if implemented. This chapter identifies the potentially affected geographic areas and documents existing conditions within those areas. In accordance with FAA Order 1050.1E, those resources that could be affected by the Proposed Action are identified herein.

3.1 Identification and Description of the Study Area

Kahului Airport is located 3 miles east of downtown Kahului on approximately 1,400 acres of land on the north shore of the island of Maui in the State of Hawaii. The Airport is owned by the State of Hawaii and operated by the HDOT-A as part of the Statewide system of airports. Exhibit 1-1, presented in Chapter 1 of this EA, shows the location of the Airport on the island of Maui.

An Area of Potential Effect (APE) was defined as the area that could be disturbed during construction, would be needed for construction staging, or would be affected by operation of the proposed ConRAC facility (see **Exhibit 3-1**). The APE includes the areas that could be affected by the Proposed Action (Alternative Site 5). Existing conditions at this site consist of roads, undeveloped land, and developed land.

While the APE was defined by the potential direct effects of implementing the feasible alternatives, a Study Area was defined to include areas that could be visually affected by the new ConRAC facility[1] (see **Exhibit 3-2**). An area extending roughly one-half mile in all directions surrounding the potential ConRAC facility site was used to define the limits of the Study Area. The Study Area contains mostly Airport property, but also includes a part of the Kanahā Pond Wildlife Sanctuary and some commercial and light industrial areas along Haleakala and Hana Highways.

[1] As stated in Chapter 1, construction of a new CONRAC facility would not affect (increase or decrease) the number of aircraft operations accommodated at OGG or the routing of aircraft in the air or on the ground at the Airport; therefore, aircraft noise was not considered in defining the Study Area.

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SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements & parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 3-1

NORTH 0 1,200 ft.

Area of Potential Effect

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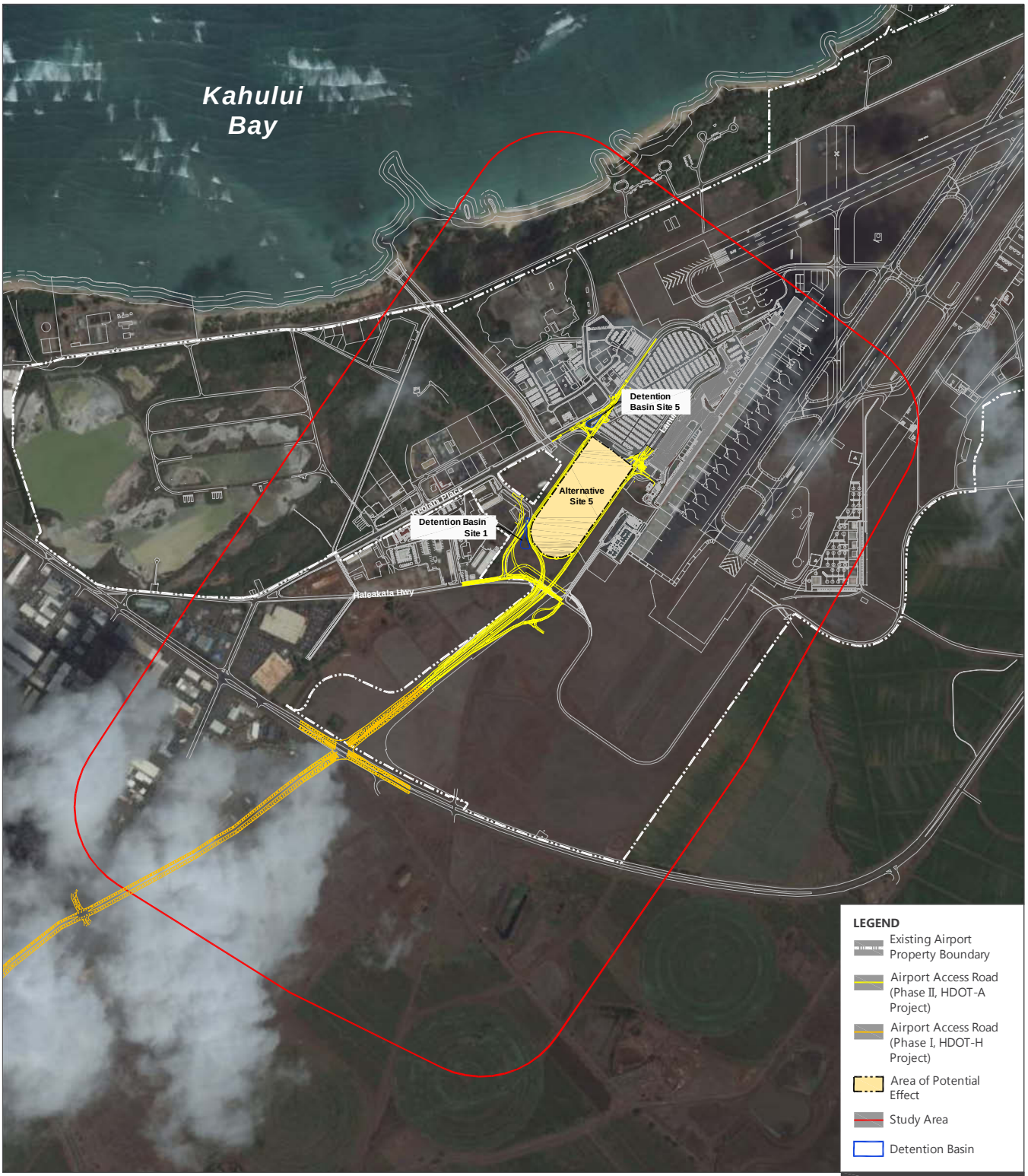

SOURCES: ESRI Microsoft Corporation-Bing Maps, 2010; Scientific Consultant Services, July 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 3-2

NORTH 0 1,600 ft.

Study Area

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3.2 Affected Jurisdictions

Kahului Airport is located in the Wailuku District of the County of Maui. Affected jurisdictions usually encompass the geographic areas in which environmental resources would be affected by activities associated with the construction and operation of a proposed action and feasible alternatives. The jurisdictions affected by the proposed ConRAC facility and associated projects discussed in this EA will be limited and restricted primarily to Airport property and areas immediately adjacent to the Airport (i.e., the Study Area depicted on Exhibit 3-2).

3.3 Existing Land Use and Zoning

The Study Area consists of roadways, developed land, light industrial commercial areas, a portion of the Kanahā Pond Wildlife Sanctuary, agricultural areas, and Airport property, which includes terminal buildings, roadways, apron areas, taxiways, runways, and aircraft hangars.

3.3.1 EXISTING LAND USES

The proposed project site is located three miles east of downtown Kahului, the island of Maui's center of commerce. Kahului is home to Kahului Harbor, the island's only deep water commercial port, and to Kahului Airport, Maui's primary airport and the second busiest airport in the State. With the harbor and Airport, the Kahului region has emerged as the focal point for heavy industrial, light industrial, and commercial activities and services, such as warehousing, baseyard operations, automotive sales and maintenance, and retailing for equipment and materials suppliers. The region is also central Maui's commercial retailing center, offering shopping centers—including Queen Ka`ahumanu Center, Maui Mall, Kahului Shopping Center, and Maui Marketplace—as well as large scale retailers and various smaller centers and merchants.

The Airport is located northeast of the commercial core of Kahului. Surrounding the commercial core is an expansive residential area consisting principally of single-family residential units to the north with the harbor and commercial centers in the middle. Residential uses encompass the area extending from the Maui Memorial Medical Center to Puunene Avenue. The residential area nearest the project site is located just over a mile east of Puunene Avenue.

Land uses on the Airport site include those owned primarily by the State of Hawaii, and related to Airport operations, as well as those leased by HDOT-A to operators and the Kanahā Pond Wildlife Sanctuary (KPWS). Much of the adjacent land is developed in public uses, including, to the south, the Maui County Department of Water Supply baseyard, the Maui District offices of the State DOT - Highways Division, and the State Department of Accounting and General Services. To the north lie Kanahā Beach Park and the Wailuku-Kahului Wastewater Reclamation Facility. These public uses are discussed further in Section 3.9, Public Lands, as required by HRS 343.

Directly west of the Kanahā Pond Wildlife Sanctuary lies Kahului Harbor and numerous industrial facilities in support of harbor operations. These facilities include harbor piers, storage facilities, and distribution centers. Tesoro Corporation and Chevron Corporation operate fueling facilities in this area. In general, the area west of the Airport is developed in heavy industrial uses. Haleakala Highway, which extends from Hana Highway near the southwest corner of the Kanahā Pond Wildlife Sanctuary, passes through a portion of Kahului Airport, and then traverses east before continuing on to the slope of Haleakala. South of Haleakala Highway and southwest of the proposed ConRAC facility are various commercial lots, including, among others, Triangle Square, high-end automobile dealerships, a Tesoro gas station, and Krispy Kreme Doughnuts. West of Dairy Road, between Haleakala Highway and Hana Highway, are Costco Wholesale and Kmart. South of Hana Highway lies a relatively expansive commercial and industrial area.

3.3.2 LAND USE DESIGNATIONS

3.3.2.1 State Land Use Districts

HRS Section 205-2, pertaining to the State Land Use Commission, established four land use districts in which all lands in the State have been classified. These land use districts are designated "Urban," "Rural," "Agricultural," and "Conservation." The project alternative site is located within the State's Urban District (see **Exhibit 3-3**).

The land on which the proposed ConRAC facility would be constructed is classified as Urban and has consistently been in urban use as part of the Kahului Airport Master Plan area. Permissible uses within the State's Urban District are identified in § 15-15-24, Hawaii Administrative Rules (HAR), "Permissible uses within the "U" district." These uses include: "any and all uses permitted by the counties, either by ordinances or rules may be allowed within this district, subject to any conditions imposed by the commission pursuant to section 205-4(g), HRS."

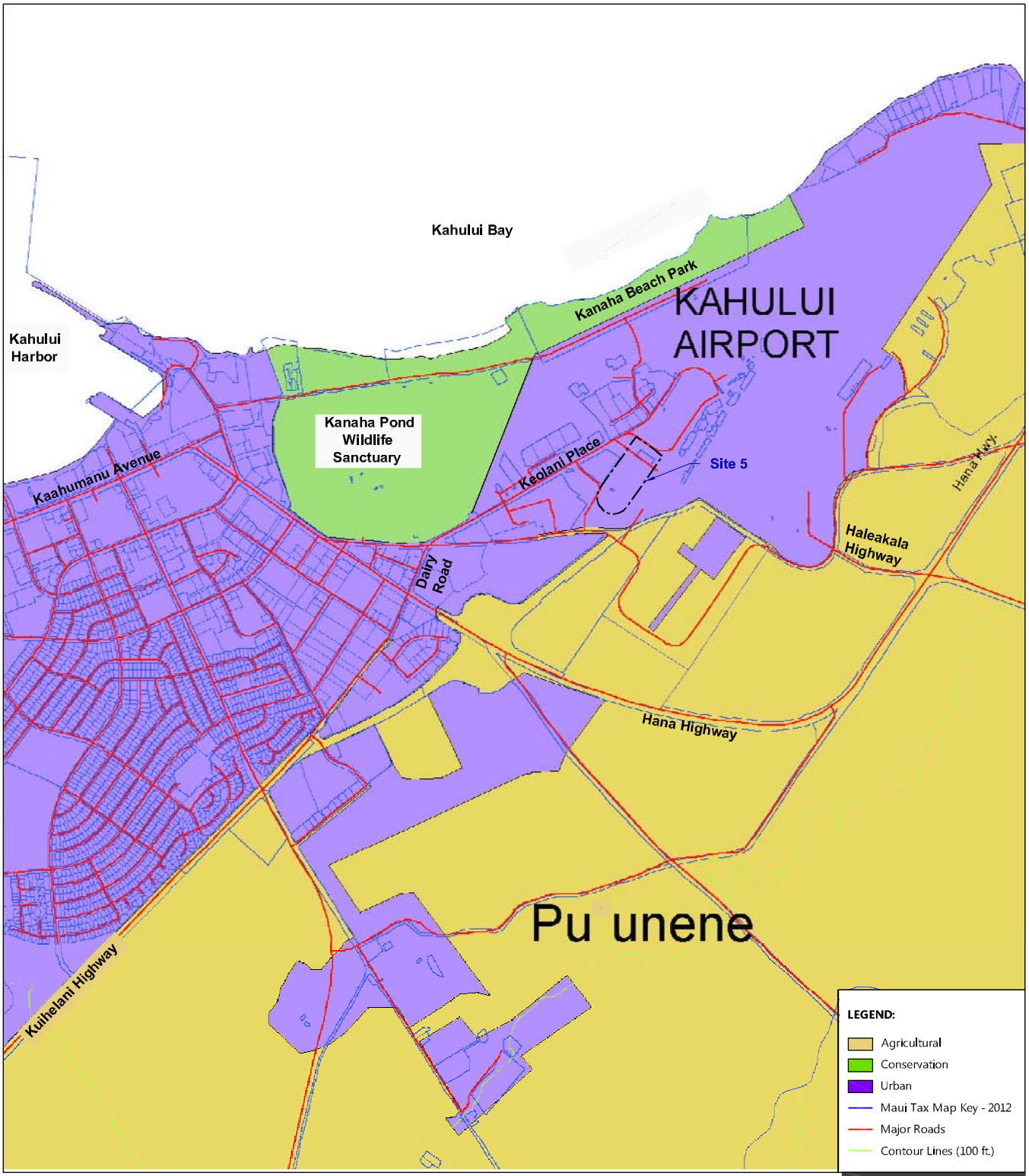
As outlined in the following subsections, the proposed ConRAC facility qualifies as an identified urban use within the *Wailuku-Kahului Community Plan* and Maui County zoning regulations.

3.3.2.2 Wailuku-Kahului Community Plan Designation

The project alternative site is within the region addressed by the *Wailuku-Kahului Community Plan*, which is one of nine community plans established within the County of Maui. The respective regional community plans are designed to implement the Maui County General Plan.

Land use guidelines are set forth on the Wailuku-Kahului Community Plan Land Use Map. The project alternative site is designated "AP, Airport" (see **Exhibit 3-4**). As defined in the *Wailuku-Kahului Community Plan*, lands designated as "Airport" include: "…all commercial accessory uses and general aviation airports and their accessory uses."

The proposed ConRAC facility, which is an accessory use to Airport operations, is in keeping with the *Wailuku-Kahului Community Plan* land use designations.



SOURCES: State of Hawaii Land Use Commission, 2011; Maui County Geographic Services Division, Department of Management, 2012; Maui County, 2012; Munekiyo & Hiraga, August 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 3-3

NORTH 0 Not to Scale

State Land Use Districts

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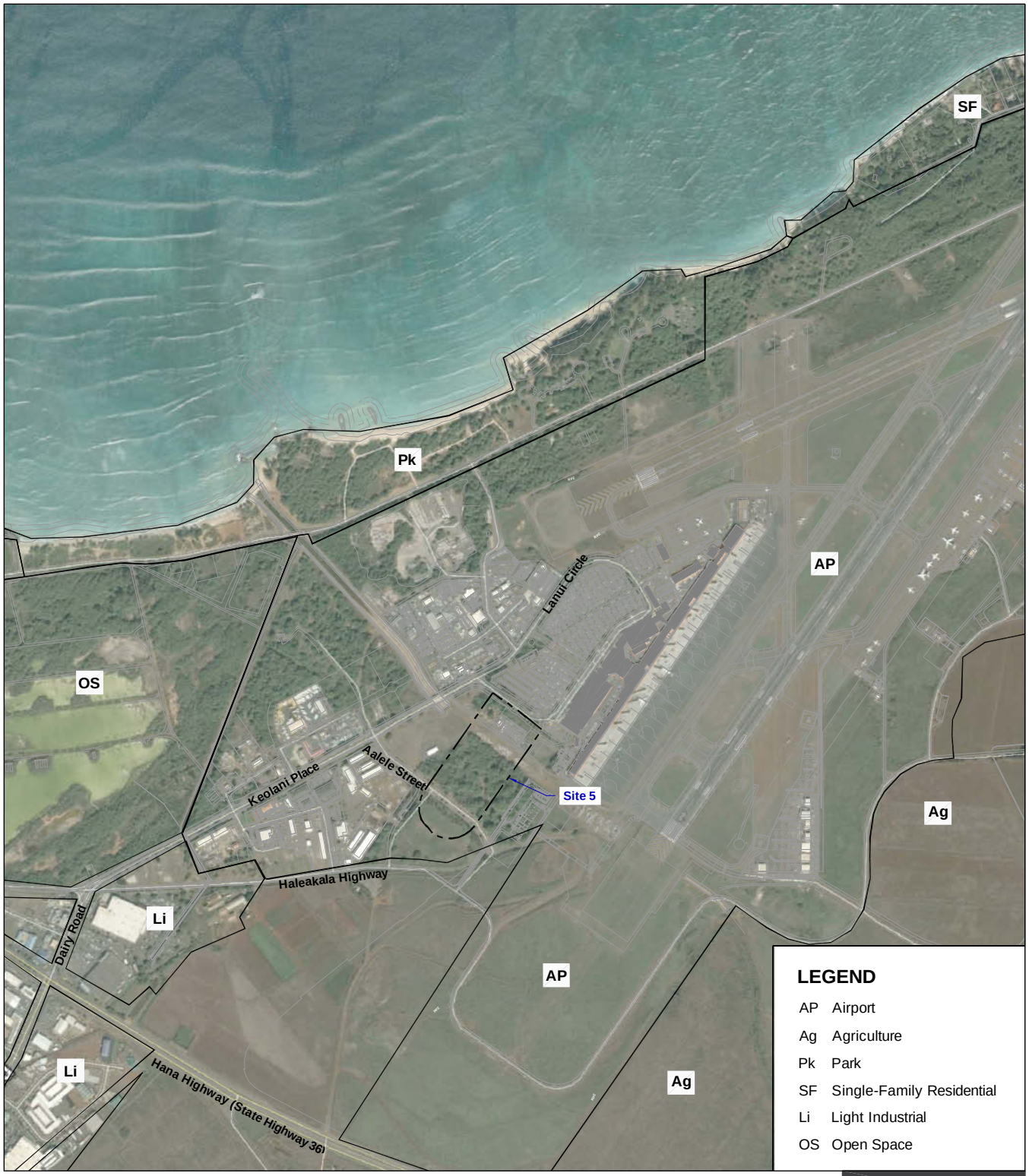

SOURCES: *Wailuku-Kahului Community Plan* ; Munekiyo & Hiraga, August 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 3-4

NORTH 0 Not to Scale

Wailuku-Kahului Community Plan Land Use Designations

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3.3.2.3 Maui County Zoning

The project alternative site is within lands identified for "Airport" use by Maui County zoning regulations. The following uses, pursuant to § 19.28.010, *Maui County Code*, "Permitted Uses," are permitted in lands zoned "Airport":

> Runways, taxiways, cleared safety areas, aircraft parking and loading aprons, terminal buildings, control towers, fire stations, airport maintenance shops and warehouses, landscaped areas, vehicular roads, auto parking lots, service stations, transient auto garages, airport post offices, restaurants and cocktail lounges, soda fountains, flower shops, gift shops, bootblack stands, photo shops, lei stands, newsstands, haberdasheries, drug stores, banks, wireless offices, transient hotels, miscellaneous concessions to serve the traveling public, postal transfer stations and bases of operations for airport ground transportation; and
>
> Aviation fuel storage and dispensing, freight warehouses, refrigeration facilities for handling of perishable air freight, electroplating shops, flying schools, flying clubs, civil air patrol, aircraft charter operations, aircraft sales, aircraft parts sales, aircraft tool distribution, utility relays or distribution, aeronautical radio facilities, facilities for contract maintenance of aircraft component parts, air freight pickup and delivery service, airline catering, u-drive business, tour operators and agencies, cold storage plants, animal or veterinary hospital or kennels, agriculture (other than animal husbandry, poultry and fowl hatcheries), housing for airport personnel, parks, aircraft tire service, aircraft show rooms, bowling alleys, insurance offices, international terminal services, steam bath and massage, trade schools, truck terminals, warehouse storage and loft buildings.

The proposed ConRAC facility would include automobile parking lots for travelers and facilities for car rental operations ("u-drive business"). The ConRAC facility would conform to the development standards outlined in the *Maui County Code*.

3.4 Demographics and Socioeconomic Profile

Table 3-1 presents historical and projected population, employment, and number of households in the State of Hawaii, Maui County, and the town of Kahului for 2000, 2010, 2015, and 2020 based on U.S. Census data and projections prepared by the Hawaii Department of Business, Economic Development, and Tourism.

Table 3-1 Population, Employment, and Households 2000-2020

ENTITY	2000	2010	2015	2020
Population				
State of Hawaii	1,211,537	1,360,301	1,148,300 1/	1,481,200 1/
Maui County	128,094	154,834	168,000 1/	181,000 1/
Kahului	20,146	26,337	n.a.	n.a.
Employment				
State of Hawaii	584,850	587,400 1/	n.a.	633,000 1/
Maui County	68,700	68,700 1/	n.a.	78,500 1/
Kahului	8,365	n.a.	n.a.	n.a.
Households				
State of Hawaii	403,240	442,267	n.a.	n.a.
Maui County	43,622	51,281	58,913 1/	64,136 1/
Kahului	5,880	6,746	n.a.	n.a.

NOTES:

n.a. = not available

1/ Population and Economic Projections for the State of Hawaii to 2040, Department of Business, Economic Development, and Tourism (DBEDT) 2040 Series, Research and Economic Analysis Division, March 2012.

SOURCES: U.S. Department of Commerce, Bureau of the Census, 2000 and 2010 Census, except as noted.

PREPARED BY: Ricondo & Associates, Inc., September 2012.

Table 3-2 presents estimated income and poverty information for the State of Hawaii, Maui County, and the town of Kahului, as reported in the U.S. Department of Commerce, Bureau of the Census, *State and County* QuickFacts, and the U.S. Census *2006-2010 American Community Survey*. **Table 3-3** shows racial characteristics for the same geographic areas in 2010.

Table 3-2 Income and Poverty Data for 2010

	STATE OF HAWAII	MAUI COUNTY	KAHULUI
Median Household Income 1/	$66,420	$63,989	$56,125
Median Family Income 1/	$77,245	$74,465	$64,171
Per Capita Income 1/	$28,882	$29,180	$21,218
Percent Individuals in Poverty	9.6%	8.9%	9.8%

NOTE:

1/ In 2010 inflation-adjusted dollars

SOURCES: U.S. Department of Commerce, Bureau of the Census, *State and County QuickFacts* (Median Household Income, Per Capita Income, Percent Individuals in Poverty); U.S. Department of Commerce, Bureau of the Census, *2006-2010 American Community Survey* 5-Year Estimates (Median Family Income), accessed May 2012.

PREPARED BY: Ricondo & Associates, Inc., May 2012.

Table 3-3 Racial Characteristics in 2010

RACES	STATE OF HAWAII		MAUI COUNTY		KAHULUI	
	POPULATION	PERCENT	POPULATION	PERCENT	POPULATION	PERCENT
White	335,994	24.7%	53,263	34.4%	2,607	9.9%
Black or African American	21,765	1.6%	929	0.6%	105	0.4%
American Indian and Alaskan Native	4,081	0.3%	619	0.4%	79	0.3%
Asian	525,076	38.6%	44,592	28.8%	13,985	53.1%
Native Hawaiian and Other Pacific Islander	136,030	10.0%	16,103	10.4%	3,345	12.7%
Some Other Race	16,324	1.2%	2,942	1.9%	421	1.6%
Two or More Races	321,031	23.6%	36,386	23.5%	5,794	22.0%
Total Population	1,360,301	100.0%	154,834	100.0%	26,336	100.0%

SOURCE: U.S. Department of Commerce, Bureau of the Census, 2010 Census.
PREPARED BY: Ricondo & Associates, Inc., May 2012.

3.5 Public Services and Infrastructure

The Airport receives potable water from the Maui County Department of Water Supply, which administers and operates the water systems on Maui. The Central Water System, one of five island systems, serves the Airport, the urban and rural areas of the Wailuku-Kahului District, the Kihei-Makena District, and small portions of the Paia District. The Central Water System draws water from four aquifers: (1) Kahakuloa, (2) Waihee, (3) Waikapu, and (4) Iao. The Airport receives all of its water from the Iao aquifer. The Airport is served by the Wailuku-Kahului Wastewater Reclamation Facility, the primary County wastewater treatment facility.

County police services are provided to the Airport and Central Maui areas from the police station located on Mahalani Street, about 4 miles west of the Airport. County fire services are provided to the Airport from the Wailuku Fire Station and Kahului Fire Station, located approximately 5 miles and 2.5 miles respectively, from the Airport passenger terminals. Airport fire protection services are also provided by the Aircraft Rescue and Fire Fighting crew.

No health care, educational, or religious facilities are located within the Study Area.

3.6 Climate, Geology, Topography, Soils, and Natural Hazards

3.6.1 CLIMATE

Kahului's climate is characterized by small temperature variations during the year, seasonal variations in rainfall, persistent surface winds from the northeast, and the rarity of severe storms. The temperature ranges from 71.5°F in January, the coldest month, to 79.2°F in August, the warmest month.

Rainfall is relatively light and occurs mostly from November through April, a period referred to as "the wet season," which contrasts with "the dry season," which extends from May through October. Major widespread rainstorms, which account for the majority of precipitation in the area, usually occur several times during each wet season, but are infrequent in the dry season. Approximately 50 percent of the normal annual rainfall occurs in December through February, and over 80 percent occurs during the 6 months of the wet season. Annual rainfall is about 20 inches.

Humidity at Kahului Airport is usually moderate to high throughout the year. The average humidity is slightly higher during the wet season than during the dry season. Northeasterly trade winds dominate the wind pattern at Kahului Airport and are most prevalent during the dry season, while variable winds occur during the wet season. Trade winds occur more than 50 percent of the time during the dry season.

The normal trade winds, accentuated by the funneling effect of Haleakala volcano and the West Maui Mountains, may attain speeds of up to 40 to 45 miles per hour (mph) at the Airport. Occasionally strong southerly (Kona) winds occur with the passage of storms during the winter months.

3.6.2 GEOLOGY

Geologically, the island of Maui is divided into East and West Maui, with East Maui dominated by the Haleakala volcano and the saddle isthmus in the center of the island, and West Maui dominated by the West Maui Mountains. The Airport is situated on the northeast side of the isthmus. The underlying geology of the Airport is a sequence of volcanic deposits, marine sediments, and terrestrial sediments on the northeastern side of the Haleakala volcano.

Typically, the West Maui basalt bedrock is thin-bedded ‘a’a and pahoehoe lava created by infrequent volcanic eruptions along rift zones. The soils of West Maui, which reach depths of about 20 feet, indicate that volcanic activity in this area probably stopped in the Pliocene or earliest Pleistocene era.

3.6.3 TOPOGRAPHY

The topography of the Kahului Airport area is characterized as relatively flat, with an average downward slope of 0.5 percent from south to north. The current ground surface elevations range from sea level at the coast to about 80 feet above mean sea level (msl) along Hana Highway in the southeastern portion of the Study Area. The Airport reference point is located near the intersection of Taxiways A and F, and has an elevation of 54 feet above msl. There are no major land forms (e.g., mountains or valleys) within the Airport boundary, nor is it likely that major land forms existed in the vicinity of the Airport in the past.

3.6.4 SOILS

The soils of Central Maui, including Wailuku, Kahului, Puunene, Waikapu, Paia, and Kihei, are generally deep, well-drained, non-stony, and well adapted for the cultivation of agricultural crops (e.g., sugar cane and pineapple).

According to the Land Study Bureau, the overall productivity rating for the Airport land is the highest possible if irrigated, and the lowest possible if not irrigated. Alexander & Baldwin, Inc. owns all of the agricultural lands immediately surrounding Kahului Airport.[2] Hawaiian Commercial & Sugar Company, a division of Alexander and Baldwin, Inc., is a 36,000-acre sugar plantation on which sugar cane on Maui has been cultivated for over 100 years.

3.6.5 NATURAL HAZARDS

Earthquakes with epicenters on or near the Hawaiian islands originate from both volcanic and tectonic activity. Most of the volcanically related earthquakes are associated with the underground movement of magma and are relatively small. These earthquakes originate from the Molokai Seismic Zone, which includes the islands of Maui and Hawaii. The Molokai Fracture Zone is a series of fractures in the sea floor that stretch from the Hawaiian islands to Baja California. Most of the fracture zone is seismically inactive, but significant earthquakes are associated with the portion near Hawaii.

Data recorded on Maui during historical times indicate that two large earthquakes in the Molokai Fracture Zone and the Ka'u earthquake of 1871 probably produced earthquakes in East Maui. Haleakala Crater is considered to be a dormant volcano. The potential earthquake damage to existing and proposed structures would be minimized by following the International Building Code (IBC) and other applicable rules and regulations. The U.S. Geological Survey (USGS) ranks the seismicity hazard for the area as "moderately high."[3]

The USGS identifies the tsunami hazard in the vicinity of the Kahului Commercial Harbor as 3 to 4 on a scale of 1 to 4, with 4 being "high."

3.7 Biological and Natural Resources

3.7.1 AIR QUALITY

The federal Clean Air Act of 1970, 42 U.S.C. 7401, et seq., as amended, requires that states identify those areas where the National Ambient Air Quality Standards (NAAQS) are not being met for specific air pollutants. The U.S. Environmental Protection Agency (EPA) designates such areas as nonattainment areas. A state with one

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[2] Hawaii State Wide GIS Program, Hawaii State Office of Planning, *Islands of Maui and Kahoolawe Large Land Owners*. http://hawaii.gov/dbedt/gis/maps/maui-kahoolawe_large_landowners.pdf, accessed August 2012.

[3] Hawaiian Volcano Observatory, U.S. Geological Survey, "Hazards in Hawai'i," http://hvo.wr.usgs.gov/earthquakes/hazards/, accessed December 2012.

or more nonattainment areas must prepare a State Implementation Plan (SIP) for each nonattainment area, detailing the programs and requirements that the state will implement to meet the NAAQS by the deadlines specified in the Clean Air Act Amendments of 1990 (CAAA), Public Law 101-49. SIPs must address all pollutants for which the NAAQS are not met.

Both federal and State standards have been established to maintain ambient air quality (see **Table 3-4**). The U.S. EPA, under mandates of the CAAA, has established primary and secondary NAAQS for seven air contaminants or criteria pollutants. These contaminants are carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), lead (Pb), sulfur dioxide (SO_2), particulate matter (PM_{10}), and fine particulates ($PM_{2.5}$). The primary standards were established at levels sufficient to protect public health with a satisfactory margin of safety. The secondary standards were established to protect public welfare from other adverse effects of air pollution. Hawaii's air quality standards for CO, NO_2, and O_3 are more stringent than the comparable federal limits. However, Hawaii's standards for Pb, PM_{10}, and SO_2 are the same as the federal standards.

Table 3-4 National and State Ambient Air Quality Standards

AIR POLLUTANT	AVERAGING TIME	FEDERAL PRIMARY STANDARD	FEDERAL SECONDARY STANDARD	STATE OF HAWAII STANDARD
Carbon Monoxide	1- hour 8-hour	35 ppm 9 ppm	-- --	9 ppm 4.4 ppm
Nitrogen Dioxide	1-hour Annual	0.100 ppm 0.053 ppm	-- 0.053 ppm	-- 0.04 ppm
Particulate Matter (PM_{10})	24-hour Annual	150 ug/m^3 --	150 ug/m^3 --	150 ug/m^3 50 ug/m^3
Fine Particulates ($PM_{2.5}$)	24-hour Annual	35 ug/m^3 15 ug/m^3	35 ug/m^3 15 ug/m^3	-- --
Ozone	8-hour	0.075 ppm	0.075 ppm	0.08 ppm
Sulfur Dioxide	1-hour 3-hour 24-hour Annual	0.075 ppm -- 0.14 ppm 0.03 ppm	-- 0.5 ppm -- --	-- 0.5 ppm 0.14 ppm 0.03 ppm
Lead	Calendar Quarter	0.15 ug/m^3	0.15 ug/m^3	1.5 ug/m^3
Hydrogen Sulfide	1-hour	--	--	0.025 ppm

NOTES:

ppm = parts per million; ug/m^3 = micrograms per cubic meter

SOURCES: U.S. Environmental Protection Agency, National Ambient Air Quality Standards (available: http://www.epa.gov/air/criteria.html) and Hawaii Department of Health, Clean Air Branch (available: http://hawaii.gov/health/environmental/air/environmental/air/cab/index.html).

PREPARED BY: Ricondo & Associates, Inc., December 2012.

In areas that do not meet the NAAQS, federal Conformity Rules apply. Conformity Rules (40 CFR 93) were issued by the U.S. EPA in response to Section 176 of the Clean Air Act (CAA). Conformity Rules prohibit any federal agency from engaging in any actions that do not conform with any state's plan to correct nonattainment situations. Based on data collected by the State Department of Health, State of Hawaii

standards and NAAQS for all pollutants are being met at the time of this EA.[4] Regarding the CAA, the entire State of Hawaii is listed as unclassifiable/attainment for all NAAQS.[5] Therefore, the FAA is not required to make a conformity determination.

3.7.2 WATER RESOURCES

The ocean waters offshore from the Airport are classified as Class A - Open Coastal Waters by the State Department of Health. The Airport is at an elevation between +10 feet and +70 feet above msl and is underlain by a thin saline brackish water lens. No potable water supplies are found within the Airport area. Potable water supplies are found at higher elevations, as they are on all the Hawaiian islands. The Airport does not overlay any of the drinking water aquifers on Maui and is below the Underground Injection Control line, which serves to protect the quality of Hawaii's underground sources of drinking water from chemical, physical, radioactive, and biological contamination that could originate from injection well activity.

Airport drainage is accommodated primarily by natural percolation and sheet runoff into Kalialinui Stream and adjacent agricultural lands. Drainage from the eastern side of the Airport is directed toward low-lying areas behind the coastal dunes, and percolates into the ground. No drainage outlets are located between the Airport and the shoreline east of Kalialinui Stream. Airport drainage is isolated from Kanahā Pond by Kalialinui Stream and the Alexander & Baldwin ditch.

Kalialinui Stream is the only ocean outlet for storm water originating on the Airport, and for extensive agricultural activities south and west of the Airport. Flow into Kalialinui Stream is intermittent with little water entering the stream during the dry summer months. Kalialinui Stream is not included in the State of Hawaii, Department of Health water quality monitoring assessment; however, the Department of Health reports that the waters off of Kanahā Beach are attaining water quality standards.[6] In 1990, the flow capacity of Kalialinui Stream was improved to reduce the area of the Airport subject to flooding. More recently, the Airport storm water drainage system was improved to remove storm water from the Airport area more effectively and efficiently.

The Alternative 5 site lies on 16.7 acres of undeveloped land, as well as land with temporary structures (UPS package processing facility). This site is slightly concave in shape, with the lowest elevations situated alongside the Kalialinui Stream channel, which passes directly under the site in a buried concrete culvert. Kalialinui Stream, which is the only aquatic resource on or near the Alternative 5 site was evaluated for its potential to be included in Waters of the United States. The "relevant reach" of Kalialinui Stream for the

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4 The Hawaii Department of Health reports one monitoring station on the island of Maui, located in Hale Piilani Park, a residential community park next to agricultural land 7 miles south of Kahului Airport (Hawaii Department of Health, http://emdweb.doh.hawaii.gov/air-quality).

5 Title 40, Code of Federal Regulations, Part 81 – Designation of Areas for Air Quality Planning Purposes, Subpart C-Section 107, Attainment Status Designations, § 81.312, Hawaii.

6 Hawaii Department of Health, *2012 State of Hawaii Water Quality Monitoring and Assessment Report: Integrated Report to the U.S. Environmental Protection Agency and the U.S. Congress Pursuant to § 303(d) and § 305(b), Clean Water Act (P.L. 97-117)*, December 2012.

purposes of this EA stretches upstream from the "Traditional Navigable Water," the Pacific Ocean, for 16,000 linear feet to just below the Haiku Ditch at 180 feet above msl where the first small unnamed tributary flows into Kalialinui Stream. This stretch of Kalialinui Stream was found to be an ephemeral stream, a "Non-Relatively Permanent Water," without adjacent wetlands. Using a significant Nexus Determination analysis, Kalialinui Stream was found to be included in the jurisdictional Waters of the United States.

3.7.3 WETLANDS

The U.S. Army Corps of Engineers' (ACE) *Wetland Delineation Manual* defines wetland areas that have positive indicators for hydrophytic vegetation, wetland hydrology, and hydric soils as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." The U.S. ACE typically takes jurisdiction over wetlands only when they lie within or adjacent to navigable waters or tributaries of such waters where those tributaries have an ordinary high-water mark. An ordinary high-water mark is defined as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in soil character, destruction of terrestrial vegetation, presence of litter or debris, or other appropriate means that consider the characteristics of the surrounding areas."

Existing wetlands within the Airport area, excluding those in the Kanahā Pond Wildlife Sanctuary, are ephemeral or short-lived. Two of the three major known wetlands on the Airport are fed from rainwater runoff discharged from the Airport's drainage system. These wetlands do, however, meet the three wetland criteria established by the U.S. ACE: (1) there is standing water for more than 7 days of the growing season; (2) more than 50 percent of the vegetation consists of obligate or facultative wetland plants; and (3) hydric and wetland soils are present within 2 feet of the surface layer. These conditions prevail in several places at and around the Airport.

A wetland survey of the Alternative 5 site was conducted to determine whether any wetland or jurisdictional Waters of the United States are present within the site. Wetlands and Waters of the United States are aquatic features that are defined by the U.S. ACE and are under federal jurisdiction. Waters of the United States include a broad range of freshwater and marine resources (as discussed in Section 3.7.2 above). Wetlands are a subset of Waters of the United States, but are governed by specific guidelines that need to be considered independently.

No wetlands were found on the Alternative 5 site and the site was determined to consist of entirely non-wetland uplands, as defined by the U.S. ACE.

3.7.4 FLOODPLAINS

Executive Order No. 11988 was enacted to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. The order was issued in furtherance of NEPA, the National Flood Insurance Act of 1968, and the Flood Disaster Act of 1973.

Floodplains are defined as lowland and flat areas adjoining waters that are subject to a 1.0 percent or greater chance of flooding in any given year, i.e., a 100-year flood event.

Tsunamis have been recorded on all of the Hawaiian Islands. On Maui, wave heights ranging from 8 feet to 17 feet have been recorded along the shoreline area between the Spreckelsville Beach house lots and Kahului Harbor. According to the FEMA Flood Insurance Rate Map (FIRM), the northeastern end of Runway 2-20, portions of Runway 5-23, and all of the beach areas adjacent to the Airport fall with the tsunami flood zone. Other portions of the Airport and all of the beach areas fall within the 100-year flood zone. **Exhibit 3-5** depicts the existing FIRM for the Study Area (September 2012).

HDOT-A is in the process of submitting an application for a Letter of Map Revision (LOMR) for the Kahului Airport area based on a flood study completed for the Airport fuel farm project.[7] Coordination with the Maui County Planning Department determined that the LOMR would amend the existing flood designations for the Kahului Airport area, which removes portions of the Airport from a designated floodway. Per the LOMR, the existing FIRM would be updated as shown in **Exhibit 3-6**.[8] The HDOT-A will continue to coordinate with the Planning Department on the LOMR application.

3.7.5 COASTAL AREAS

The Coastal Zone Management Act of 1972 ensures effective management, beneficial use, protection, and development of the coastal zone. Coastal zone management programs, prepared by states according to guidelines issued by the National Oceanic and Atmospheric Administration, are designed to address issues affecting coastal areas. In Hawaii, the coastal areas include the waters from the shoreline to the seaward limit of the State's jurisdiction, and all lands of the State. In addition, two "belts" circling the islands, referred to as the Special Management Area (SMA) and the Shoreline Setback Area, have been established for more intensive management by the counties.

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[7] R.M. Towill Corporation, *Drainage Report (Final), Kahului Airport Fuel Farm Flood Study, Kahului, Maui, Hawaii*, July 2012.

[8] Per the amendment, the Zone AEF flood zone would be designated Zone AE. Zone AE corresponds to the 100-year base floodplain where base flood elevations are provided. Zone AEF denotes floodway areas in Zone AE (the floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the one percent annual chance flood can be carried without increasing the base floodplain elevation).

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SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, GIS Clearinghouse, Federal Emergency Management Agency (FEMA), Accessed Online: http://hawaii.gov/dbedt/gis/data/dfirm.pdf, Nov. 2011, Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc.,November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 3-5

NORTH 0 1,200 ft.

100-Year Floodplain Map

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 3 Study Area & Preferred Action_08202012.dwg_Layout: EA Ex 3-5_Sep 06, 2013, 11:57am

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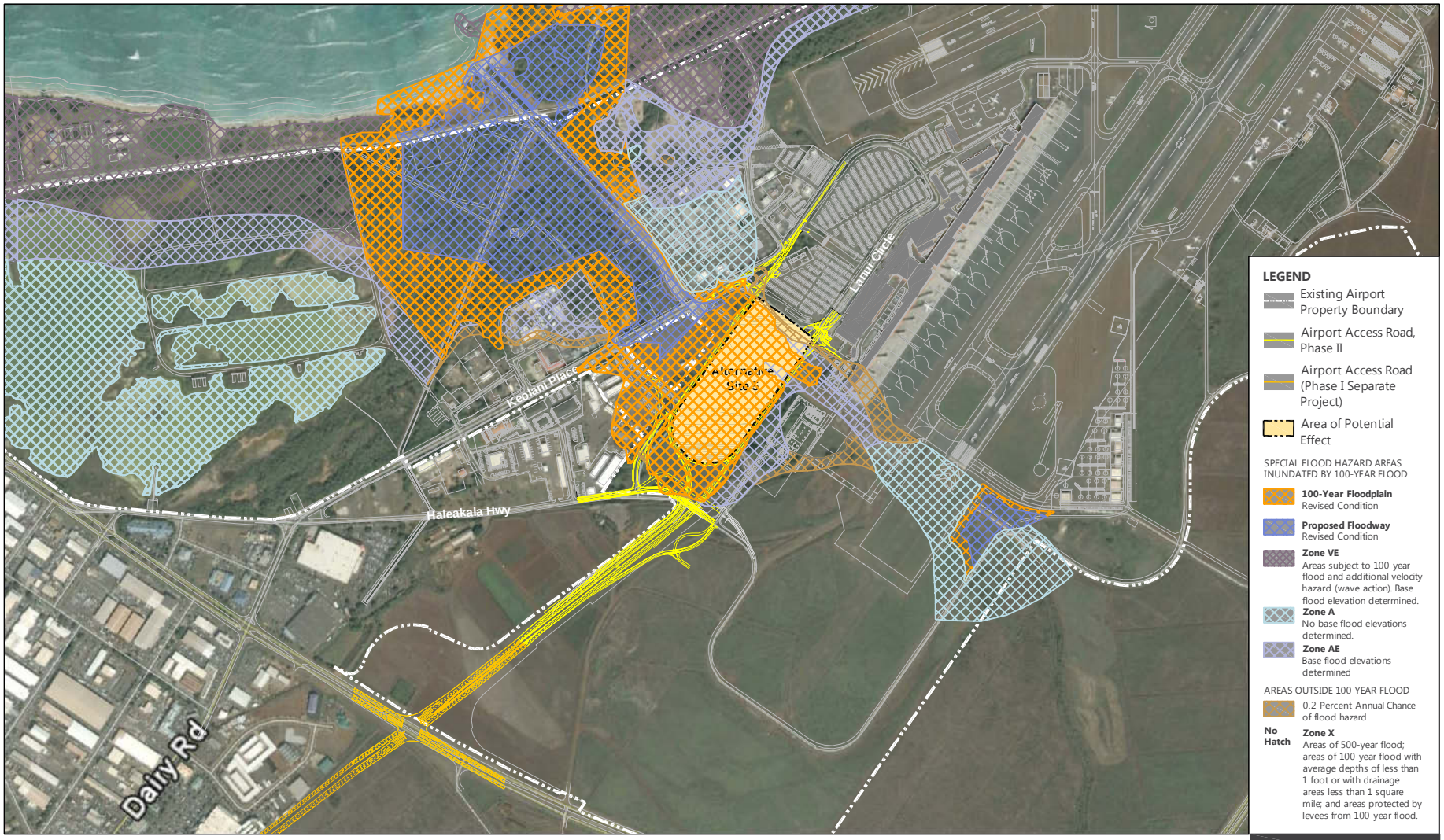

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, GIS Clearinghouse, Federal Emergency Management Agency (FEMA), Accessed Online: http://hawaii.gov/dbedt/gis/data/dfirm.pdf, Nov. 2011, Kim & Shiroma Engineers, Inc., 2009 (roadway improvements and parking expansion); Ricondo & Associates, Inc., August 2013.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 3-6

NORTH 0 1,200 ft.

Revised 100-Year Floodplain Map

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 3 Study Area & Preferred Action_08202012.dwg_Layout: EA Ex 3-6_Sep 06, 2013, 11:59am

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Federal actions on lands within the State's Coastal Zone Management Program (CZMP) may be subject to State consistency requirements when they generate spillover impacts that significantly affect the area, uses, or resources within the purview of the State's CZMP. According to the State of Hawaii Office of Planning, the Proposed Action is not on a list of federal actions that trigger a consistency concurrence with the State's CZMP.[9] As such, development proposed on Alternative Site 5 is not subject to a State coastal zone consistency determination.

3.7.6 BIOTIC COMMUNITIES

3.7.6.1 Flora

The vegetation throughout the APE consists primarily of non-native species with a few scattered common native species. No special habitats were found on the alternative site. A botanical survey of Alternative Site 5 and associated detention basins was conducted (see **Appendix B**). Areas most likely to harbor native or rare plants were more intensively examined.

Alternative Site 5 is significantly disturbed in both terrain and vegetation; by military use during World War II and by subsequent Kahului Airport development. Alternative Site 5 has moderate diversity in shrubs and trees.

Alternative Site 5 includes a few temporary structures on the north side (UPS facility), while the central area and southern end consist of undeveloped brush land. Elevations at Alternative Site 5 range between 7 feet and 19 feet above msl. The soil is Molokai silty clay loam, but the deep water table lies above the basal igneous rock level. Alternative Site 5 is densely vegetated with grasses, shrubs, vines, and trees. A total of 58 plant species were recorded on the Alternative 5 site. Four non-native species were common: buffelgrass, Guinea grass (*Megathyrsus maximus*), koa haole (*Leucaena leucocephala*), and kiawe (*Prosopis pallida*). Six species were native to Hawaii, ʻuhaloa, ʻākulikuli (*Sesuvium portulacastrum*), ʻāheahea (*Chenopodium oahuense*), kipukai (*Heliotropium curassavicum*), kāʻeʻe (*Mucuna gigantea*), and ʻilima (*Sida fallax*). All six of these native species are common in Hawaii and five of them are also widespread in the tropical Pacific. Fifty-two species were non-native plants.

3.7.6.2 Fauna

A walk-through fauna survey was conducted in conjunction with the botanical survey (see Appendix B).

MAMMALS

Five species of non-native mammals or their signs were observed during site visits to the project area. These included feral cats (*Felis catus*), axis deer (*Axis axis*), dogs (*Canis familiaris*), mice (*Mus domesticus*), and rats (*Rattus spp.*). All five species were of rare occurrence in this dry environment and of little concern.

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[9] U.S. Department of Commerce, National Oceanic and Atmospheric Administration, *Federal Consistency Review: Hawaii's Listed Federal Actions*. Retrieved from http://coastalmanagement.noaa.gov/consistency/media/hi.pdf (February 15, 2013).

A special effort was made to find any occurrence of the endemic and endangered Hawaiian hoary bat (*Lasirus cinereus semotus*) by conducting an evening survey in the project area. When present in an area, these bats can be easily identified as they forage for insects; their distinctive flight patterns are clearly visible in the glow of twilight. No evidence of such activity was observed during conditions of excellent visibility during field surveys conducted in June 2012. Additional surveys conducted in October 2012 for the storm water detention basins and as part of surveys for Phase II of the Airport Access Road detected vocalizations of at least one Hawaiian hoary bat using an electronic bat detector (Batbox IIID), set to the frequency of 27,000 Hertz that these bats are known to use for echolocation.

BIRDS

Fourteen species of non-native birds were observed during three site visits. Of common occurrence were the zebra dove (*Geopelia striata*), nutmeg mannikin (*Lonchura punctulata*), house sparrow (*Passer domesticus*), gray francolin (*Francolinus pondicerianus*), and spotted dove (*Streptopelia chinensis*). The nine other species were of uncommon or rare occurrence. No native forest birds, including any endangered waterbirds, were seen or would be expected in this dry habitat. A few other non-native birds, such as the cattle egret (*Bubulcus ibis*), northern cardinal (*Cardinalis cardinalis*), Java sparrow (*Padda oryzivora*), and Japanese white-eye (*Zosterops japonicus*), are occasional visitors to the area.

INSECTS

Insect life was sparse at Alternative Site 5.

Alternative Site 5 had someinsect diversity, with a total of 13 non-native species among seven insect orders. Four species were common: the monarch butterfly (*Danaus plexippus*), cabbage butterfly (*Pieris rapae*), Castor semilooper (*Achaea janata*), and dung fly (*Musca sorbens*). The remaining nine species were uncommon to rare.

REPTILES

Just one common, non-native reptile, the mourning gecko (*Lepidodactylus lugubris*) was heard calling during the evening survey on the Alternative 5 site.

3.7.7 ENDANGERED AND THREATENED SPECIES

Twenty-one endangered and one threatened plant species occur or occurred on the island of Maui. These plants are scattered throughout Maui in diverse ecosystems. The 21 Maui plants are listed in the Maui Plant Cluster Recovery Plan and grow in a variety of vegetation communities (forests, shrub lands, and volcanic cliffs), elevation zones (coastal to high cliff faces), and moisture regimes (dry to wet). Of the 21 Maui plants listed, 12 are endemic to the island. The land that supports these plants is owned by the State of Hawaii, Maui County, the federal government, and various private parties. Much of the federal land is part of Haleakala National Park and other federal lands are controlled by the U.S. Army and the U.S. Navy.

These plants and their habitats have been variously affected or are currently threatened by one or more of the following: trampling, predation, and habitat destruction by introduced animals; habitat degradation and competition for space, light, water, and nutrients by naturalized, alien vegetation; habitat loss from fires; alien insects; disease; small number of individuals and populations; and loss of pollinators. Seeds and/or plants of

many of the Maui cluster have been collected and some have been successfully propagated for reintroduction.[10]

As noted above, vocalizations of at least one endangered Hawaiian hoary bat was detected during surveys conducted in October 2012.[11] Many migrant shorebirds and waterfowl have been observed in the Kanahā Pond Wildlife Sanctuary and it was assumed that this area is used for nesting. The pond is home to two endangered species: the Hawaiian Stilt (*Himantopus mexicanus knudseni*) and the Hawaiian Coot (*Fulica alai*).[12] Kanahā Pond is located approximately one-half mile from Alternative Site 5.

The endemic and endangered Blackburn's sphinx moth (*Manduca blackburni*) has been known to occur in the immediate vicinity of Alternative Site 5, but was not observed during the survey. This large moth has developed an alternative host plant relationship with the non-native tree tobacco (*Nicotiana glauca*), which is playing a role in the moth's survival and recovery. Several tree tobacco plants were seen on Alternative Site 5. Examinations of these plants failed to discern any eggs or larvae of the moth, although such activity is usually confined to the winter and early spring months when moisture is higher and plant growth is rapid. The pupae of these moths, however, may be present in the soil and leaf litter below the tree tobacco plants where these moths migrate after their larvae mature and enter the pupal stage, and where they would remain until emerging as adults at the onset of the next wet season.

3.8 Historic, Archaeological, Architectural, and Cultural Resources

Historic, archaeological, architectural, and cultural resources are prehistoric and historic sites, districts, structures, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. Numerous laws and regulations require that possible effects on these resources be considered during the planning and execution of federal undertakings. These laws and regulations stipulate a process of compliance, define the responsibilities of the federal agency proposing the actions, and prescribe the relationships among involved agencies. In addition to NEPA, the primary laws that pertain to the treatment of historic, archaeological, architectural, and cultural resources during environmental analyses are the National Historic Preservation Act (NHPA, especially Sections 106 and 110), the Archaeological Resources Protection Act, the American Indian Religious Freedom Act, and the Native American Graves Protection and Repatriation Act.

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10 Pacific Islands Fish and Wildlife Office, *Endangered Species in the Pacific Islands*, March 25, 2010, http://www.fws.gov/pacificislands/flora/mauiplantcluster.html

11 Robert W. Hobdy, *Botanical and Fauna Surveys, Kahului Airport Corridor & Detention Basins 1 &5*, October 2012.

12 Kanahā Pond State Wildlife Sanctuary, *Overview, Maui Info Source*. http://www.mauiinfosource.com/Maui History & Culture/Maui Museums & Historical Landmarks/Central Maui Museums & Historical Landmarks/Kanaha Pond/kanaha_pond_main.htm (accessed August 2012.

Section 106 of the NHPA requires that federal agencies consider whether their activities could affect historic properties that are already listed, determined eligible, or not yet evaluated under the National Register of Historic Places (NRHP) criteria. Properties that are either listed in or eligible for listing in the NRHP are provided the same measure of protection under Section 106. If an undertaking has the potential to affect historic properties, then the federal agency, in consultation with the State Historic Preservation Officer (SHPO), defines an APE. The APE is defined in 36 CFR § 800.16(d) as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist."

Exhibit 3-1 depicts the APE used by the FAA to identify whether any historic properties exist within the area anticipated to be affected by the Proposed Action. The APE was defined by determining the extent of construction or alteration of existing structures. The FAA determined the size of the APE and coordinated the APE with the Hawaii State Historic Preservation Division (SHPD) by letter dated October 2, 2012 as part of the agency scoping process.[13] The FAA did not receive an objection from the SHPD to its determination during the 30 day period (allotted per 36 CFR 800) following receipt of the FAA's letter by the SHPD.

An archaeological survey of the APE was conducted to determine if archaeological deposits are present in surface and subsurface contexts (see **Appendix C**). Alternative Site 5 encompasses approximately 17 acres of land that is currently used as a baseyard and construction materials storage area. Within Alternative Site 5, large piles of excavated soil from other locations, as well as asphalt, are mounded, in some cases over 25 feet in height. A thorough pedestrian survey was conducted of the entire parcels and mechanical subsurface testing of representative locations was performed within the site for evidence of significant archaeological and/or historic sites or features.

Twelve stratigraphic trenches were mechanically excavated at Alternative Site 5 within the APE. The findings are summarized as follows:

- No cultural materials or deposits/features of potential historic significance were present in subsurface contexts in the APE.
- All excavated trenches exposed natural silt deposits overlying the area C-horizon. On Alternative Site 5, the silts underlie engineered fill deposits from the surface. Silt, an agricultural use layer, was ubiquitous in each excavated trench, with differences between trenches only in varying levels of compactness. No sandy sediment was identified in any of the trenches.
- No traditional artifacts or buried cultural layers were identified in any of the excavation trenches.
- No human remains were identified in any of the excavation trenches.

Two historic era properties were identified during the survey of the APE: a short remnant of a historic-era concrete flume (State Site Number 50-50-04-7347) and a generator building likely associated with former

[13] Certified letter to Ms. Pua Aiu, Administrator, State Historic Preservation Division, October 2, 2012 (see Appendix A).

U.S. Navy use of the lands (State Site Number 50-50-04-7348). The flume was present southwest of Alternative Site 5, within former sugar cane cultivation lands; its function was to transport water to the fields. The site dates to the early to mid-1900s. State Site Number 50-50-04-7348 is a small building in the north central portion of Alternative Site 5. The building likely housed a generator and was constructed in the 1940s, when the current Airport area was transformed into Naval Air Station Kahului.

As mentioned above, no cultural deposits or buried cultural layers were identified within any of the 12 trenches tested throughout the alternative site.

3.9 Public Lands

As required by HRS 343, public lands in the vicinity of the Proposed Action are discussed in this section of the EA. Alternative Site 5 is located within the Kahului Airport Master Plan area, on Tax Map Key (TMK) (2)3-8-001:239 (Parcel 239), a 1-acre parcel currently occupied by United Parcel Service (UPS), and an approximately 16-acre portion of the 1,036-acre Airport parcel identified as TMK (2)3-8-001:019 (Parcel 19). Numerous publicly owned parcels are located within a half-mile radius of the alternative site. A majority of the parcels are owned and managed by the HDOT-A related to Kahului Airport. The Study Area also includes a significant amount of land dedicated to County and State public road rights-of-way and future public roadways and parcels owned and used by Maui County and the federal government.

The Kanahā Pond Wildlife Sanctuary, which is on Airport property, is managed by the State Department of Land and Natural Resources (DLNR) under a Memorandum of Agreement between the FAA, the Hawaii DOT, and DLNR, signed in 1973. The Hawaii DOT and DLNR have completed a Memorandum of Understanding to set the boundaries of the 235-acre wildlife sanctuary, and to define DLNR's management obligations with regard to the sanctuary under the Endangered Species Act. The day-to-day management of the wildlife sanctuary would not be affected by the proposed ConRAC facility and it would continue to be managed by the DLNR.

3.9.1 KAHULUI AIRPORT MASTER PLAN AREA

Parcel 19, along with adjacent and nearby parcels that have been subdivided from Parcel 19, as well as parcels acquired by the HDOT-A, define the boundary of the Kahului Airport Master Plan area. In total, the Kahului Airport Master Plan area includes over 80 parcels encompassing approximately 1,447 acres.

Kahului Airport was originally constructed as Naval Air Station Kahului, which was converted to commercial operations in the early 1950s and turned over to the Territory of Hawaii in 1958. The northern and eastern portions of Naval Air Station Kahului remain in use as Kahului Airport. The southern portion, encompassing approximately 235 acres, was set aside as the Kanahā Pond Wildlife Sanctuary, which is administered by the DLNR. While the Kahului Airport Master Plan area includes numerous land uses, most parcels are owned by the State of Hawaii and leased by various operators for Airport related uses, such as rental car facilities, air cargo operations, and heliport operations.

As Kahului Airport occupies a large area in the regional context, numerous significant public uses are located within the boundary of the Airport and in proximity to the Airport. Significant public uses within the Kahului Airport Master Plan Area include the Kanahā Pond Wildlife Sanctuary, located northwest of the alternative site, and the State of Hawaii DOT - Highways Division Maui District office, located at the intersection of Keolani Place and Palapala Drive (see **Exhibit 3-7**).

Nearby public land uses located outside the Kahului Airport include Kanahā Beach Park to the north, the Maui County Wailuku-Kahului Wastewater Reclamation Facility to the northwest, and Kahului Harbor, approximately 1.3 miles west-northwest of the alternative site. These public land uses are discussed in the following subsections.

3.9.1.1 Airfield Operations

The Air Operations Area (AOA) at the Airport is situated primarily within Parcel 19. The airfield includes runways, taxiways, and aircraft aprons. Kahului Airport has two operating runways. Runway 2-20 serves as the primary runway for commercial airline aircraft operations and is 6,995 feet long and 150 feet wide. Runway 5-23 is 4,990 feet long and 150 feet wide and serves commuter airline aircraft operations, as well as limited commercial passenger airline aircraft operations.[14]

In addition to the two runways, a network of taxiways connects various portions of the airfield. Aircraft aprons are located on both the east and west Airport ramps. The aircraft apron on the eastern ramp is used primarily for general aviation, including executive (private) jets. A second portion of the east ramp apron is used for helicopter operations at the Kahului Heliport. The west ramp area includes the passenger terminal apron, which has 18 passenger boarding bridges. A general purpose apron is located adjacent to the south end of the passenger terminal apron and adjacent to the Alien Species Action Plan (ASAP) inspection building and cargo buildings. The general purpose apron allows for loading and unloading of cargo as well as the temporary storage of disabled aircraft. The commuter terminal apron is located just south of the west end of Runway 5-23 and serves commuter aircraft operations.

Three parcels are designated for aircraft storage. Parcel 178 is designated for "Aircraft Parking," Parcel 196 is designated for "Aircraft Tie-Downs," and Parcel 215 is designated for "Helipads". Two other parcels are designated for vehicle parking (Parcel 204) and unimproved land (Parcel 77).

[14] U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii,* September 1997.

SOURCES: Maui County, Department of Management, Geographic Services Division, 2010; Maui County, 2012; Munekiyo & Hiraga, August 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 3-7

NORTH 0 1,600 ft.

Public Uses, Kahului Airport Master Plan Area

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3.9.1.2 Passenger Terminal Complex and Commuter Terminal

The passenger terminal facilities at Kahului Airport are located west of Runway 2-20 and include a variety of facilities that support passenger operations, including the ticketing lobby, security facilities, baggage claim, and passenger holding areas. While 11 of the passenger terminal complex buildings are located on unique TMK parcels, many of the connecting walkways and bridges, as well as a few terminal complex buildings, are situated on Parcel 19. The unique parcels on which the passenger terminal buildings are located are listed in **Table 3-5**.

Table 3-5 Passenger Terminal Complex and Commuter Terminal Parcels

TAX MAP KEY	BUILDING NO.	PURPOSE	PARCEL AREA (SF)
(2)3-8-001:173	340	Central Passenger Terminal	18,888
(2)3-8-001:209	330	Security Checkpoint/Passenger Terminal	14,953
(2)3-8-001:220	309	Car Rental Booths	1,660
(2)3-8-001:223	320	Ticketing Lobby/Baggage Claim Corridor	19,147
(2)3-8-001:224	341	Holding Room B	21,433
(2)3-8-001:226	321	Ticketing Lobby	57,002
(2)3-8-001:227	343	Concourse A-B	3,484
(2)3-8-001:228	345	Holding Room A	18,347
(2)3-8-001:236	346	Holding Room D	22,080
(2)3-8-001:240	342	Holding Room C	22,051
(2)3-8-001:241	322	Baggage Claim	38,804
(2)3-8-001:243	350	Holding Room E	29,412

SOURCES: Maui County, Department of Finance, Real Property Tax Division; Edward K. Noda and Associates, Inc., 1996.
PREPARED BY: Munekiyo & Hiraga, August 2012.

3.9.1.3 Air Cargo Facilities

Most air cargo at OGG is processed at the cargo building located at the south end of the passenger terminal complex. The cargo building, which opened in August 2007, accommodates both interisland and overseas airlines. The cargo facilities, including accessory taxiway improvements and the extension of the west ramp, also include the ASAP inspection building, which is used to inspect incoming cargo for invasive species.[15] The cargo facilities are located within Parcel 19, adjacent to, but outside of, the AOA. UPS currently conducts operations on Parcel 239, which is part of Alternative Site 5. Parcel 239, which is currently leased by UPS, is a 1-acre parcel located southwest of the public parking lot. The ConRAC facility would occupy a total of 17 acres of Parcel 19 and Parcel 239 in its entirety.

[15] State of Hawaii Department of Transportation - Airports Division, Kahului Airport. Hawaii Aviation, 2012. Retrieved from http://hawaii.gov/hawaiiaviation/hawaii-airfields-airports/maui/kahului-airport (June 19, 2012).

3.9.1.4 Ground Transportation

At present, 12 parcels located just south of the approach to Runway 5-23 are available for lease for rental car operations, including maintenance and car wash facilities. These parcels are accessible from Koeheke Street, which intersects with Keolani Place, and the cul-de-sacs of West Mokuea Place and East Mokuea Place. TMKs for these parcels are included in **Table 3-6**. The State provides improved streets and initially graded the lots while the operators of the facilities are responsible for construction and maintenance of their facilities.

Table 3-6 Ground Transportation Subdivision Operators

TAX MAP KEY	OPERATOR	PURPOSE	PARCEL AREA (SQUARE FEET)
(2)3-8-001:092	DTAG Operations (dba Dollar Rent A Car)	Customer Lobby, Vehicle Storage and Service	183,431
(2)3-8-001:097	Vanguard Car Rental (dba National Car Rental)	Vehicle Storage	35,493
(2)3-8-001:152	Avis Rent A Car System	Customer Lobby, Vehicle Storage	45,472
(2)3-8-001:153	Avis Rent A Car System	Vehicle Storage	43,552
(2)3-8-001:154	Avis Rent A Car System	Vehicle Storage and Service	43,552
(2)3-8-001:155	The Hertz Corporation	Customer Lobby, Vehicle Service and Storage	174,244
(2)3-8-001:157	Budget Rent A Car System	Customer Lobby, Vehicle Service and Storage	130,679
(2)3-8-001:158	Vanguard Car Rental (dba Alamo Rent A Car)	Vehicle Storage	65,275
(2)3-8-001:159	Vanguard Car Rental (dba Alamo Rent A Car and National Car Rental)	Customer Lobby, Vehicle Service and Storage	131,751
(2)3-8-001:160	DTAG Operations Inc. (dba Thrifty Car Rental)	Customer Lobby, Vehicle Service and Storage	51,287
(2)3-8-001:161	DTAG Operations Inc. (dba Thrifty Car Rental)	Vehicle Storage	20,370
(2)3-8-001:162	DTAG Operations Inc. (dba Thrifty Car Rental)	Vehicle Storage	10,012

SOURCE: County of Maui, Department of Finance, Real Property Tax Division, 2012.
PREPARED BY: Munekiyo & Hiraga, August 2012.

Four parcels located between the ground transportation subdivision and the shoreline are used by various rental car companies for additional vehicle storage. These parcels are identified by TMKs (2)3-008-001:096, (2)3-008-001:185, (2)3-008-001:248, and (2)3-008-001:249.[16]

At least one other rental car operation is located on property owned by the HDOT-A; the Enterprise Rent-A-Car operation is located on TMK (2) 3-8-001:101, off Kaonawai Street.

3.9.1.5 Airport Commercial and Industrial Areas

One Airport commercial area is located along Kaonowai Place, located off the north side of Keolani Place. Five parcels are leased to commercial enterprises. One parcel in the area is used for HDOT-A operations and two parcels are undeveloped (see **Table 3-7**).

Table 3-7 Airport Commercial Subdivision

TAX MAP KEY	LESSEE	PARCEL AREA (SQUARE FEET)
(2)3-8-001:101	Enterprise Rent-A-Car	65,340
(2)3-8-001:121	Developed, Unoccupied	34,800
(2)3-8-001:131	Robert's Tours & Transportation (dba Robert's Hawaii)	87,120*
(2)3-8-001:145	Robert's Tours & Transportation (dba Robert's Hawaii)	87,120*
(2)3-8-001:181	Developed, Unoccupied	34,848
(2)3-8-001:189	Graded, Undeveloped	87,120*
(2)3-8-001:192	Undeveloped	87,120*

NOTE: *According to the Maui County TMK Maps, parcel areas are approximately 2 acres.

SOURCE: Munekiyo & Hiraga, August 2012.
PREPARED BY: Munekiyo & Hiraga, August 2012.

Two of the undeveloped parcels, identified as TMK (2)3-8-001:189 and (2)3-8-001:192, have been approved for development of an airline fueling facility. A proposed fuel storage project includes the installation of four storage tanks, one of which would be used for backup storage. Additional improvements include a control building and underground fuel line that would serve a load rack facility at the Airport.

3.9.1.6 DOT - Highways Division Maui District Offices

Hawaii DOT facilities, including the Highways Division Maui District offices and baseyards, are situated on TMK (2)3-8-079:018. The facilities are accessible from the south side of Keolani Place via Palapala Drive and from

[16] County of Maui, Department of Finance, Real Property Tax Division. Property Record Search. 2012. Retrieved from http://www.qpublic.net/hi/maui/search.html (June 19, 2012).

the north side of Haleakala Highway via Kuleana Street, which connects to Palapala Drive via Mua Street. The parcel encompasses approximately 22.5 acres.

3.9.1.7 Maui County Department of Water Supply Baseyard

A Maui County Department of Water Supply baseyard is situated on the Hawaii DOT - Highways Division Maui District offices complex parcel. The baseyard serves Maui County Department of Water Supply operations and includes a State Department of Health approved drinking water lab.

3.9.1.8 Kanahā Pond Wildlife Sanctuary

Approximately 235 acres of the northwest extent of Parcel 19 have been formally dedicated to the DLNR and set aside as the Kanahā Pond Wildlife Sanctuary. On the north, west, and south sides, the boundary of the Kanahā Pond Wildlife Sanctuary follows the Parcel 19 boundary. The eastern boundary extends to the Alexander & Baldwin, Inc., ditch. Seven small parcels are located within the Kanahā Pond Wildlife Sanctuary. TMK (2)3-008-001:148 consists of 2 acres and Parcel 104 encompasses 5,676 square feet. The remaining five parcels—TMKs (2)3-008-001:020, (2)3-008-001:147, (2)3-008-001:182, (2)3-008-001:183, and (2)3-008-001:184—each encompass no more than 2,000 square feet.

3.9.1.9 Airport Access

The airline passenger facilities are primarily accessed via Keolani Place, which runs northeasterly from its intersection with Dairy Road and Haleakala Highway. Within Parcel 19, Keolani Place is maintained by HDOT-A, while the approximately 0.3-mile section east of the Haleakala Highway-Dairy Road intersection is maintained by the Hawaii DOT - Highways Division. Additional access to the Airport is provided from the south via Haleakala Highway and Aalele Street and from the northwest via Amala Place through Koeheke Street. The general aviation area is accessible from the south via Haleakala Highway, Kala Road, and Eena Street. Various other roads provide access throughout the Airport.

A future Airport access roadway will be aligned to the east of Dairy Road.[17] An approximately 29.3-acre area between Hana Highway and Haleakala Highway, adjacent to the proposed Airport industrial area on the east (TMK (2)3-8-079:021) would be used for the northern portion of the proposed Airport Access Road; TMK (2)3-8-006:075, encompassing approximately 19.5 acres, would be set aside for the southern portion of the Airport Access Road. A right-of-way extends south from the parcel to the point where Dairy Road becomes Kuihelani Highway. The Airport boundary, as defined in the Kahului Airport Master Plan, includes TMK (2)3-8:006:075 and the right-of-way, including a portion of Kuihelani Highway.

[17] The Hawaii DOT - Highways Division documented the anticipated impacts of the Phase I segment of this Airport access roadway in an EA and a Finding of No Significant Impact was issued in September 2012 by the Federal Highway Administration. Phase II is being separately designed and administered by the HDOT-A. The potential environmental impacts of Phase II were evaluated in a documented Categorical Exclusion since they were not covered in the scope of the Hawaii DOT - Highways Division EA for Phase I of the project. The FAA approved the documented Categorical Exclusion for Phase II of the Airport Access Road on May 21, 2013.

3.9.1.10 Runway Protection Zones and Periphery Reserve Lands

The State of Hawaii has been procuring land at the north and south ends of Runway 2-20 and at the northeast end of Runway 5-23 to be reserved as runway protection zones. TMKs (2)3-8-001:134 and (2)3-8-001:116, at approximately 100 acres and 43 acres, respectively, include the runway protection zone at the south end of Runway 2-20; several shoreline parcels north of the runway include the runway protection zone at the north end. The approximately 18-acre parcel, TMK (2)3-8-001:122, includes the runway protection zone northeast of Runway 5-23.[18]

Additional land owned by the State of Hawaii serves as a reserve for future Airport operations on the east ramp. This land includes TMK (2)3-8-001:222, which encompasses approximately 112 acres.[19]

3.9.1.11 Proposed U.S. Postal Service Facilities

The parcel identified as TMK (2)3-9-001:098, which encompasses 4.98 acres, is owned by the U.S. Postal Service (USPS). The site was included in the 1993 Kahului Airport Master Plan for development as a Post Office; however, the parcel is currently undeveloped, except for semipermanent tent-type structures used for airmail operations.[20] The proposed USPS site is adjacent to the proposed ConRAC facility to the west.

3.9.2 COUNTY FACILITIES

3.9.2.1 Kanahā Beach Park

Kanahā Beach Park, which occupies lands that were dedicated to Maui County for establishment of the park by the Hawaii DOT, lies on the shoreline along the northern boundary of the Airport. The park is a popular location for ocean-related activities, as well as camping. Kanahā Beach Park is identified as TMK (2)3-8-001:119, and encompasses approximately 90 acres in size. The same parcel also underlies portions of Amala Place south of and extending west from the park.

3.9.2.2 Wailuku-Kahului Wastewater Reclamation Facility

The Wailuku-Kahului Wastewater Reclamation Facility is located along the shoreline adjacent to Parcel 19, across Amala Place from and north of the Kanahā Pond Wildlife Sanctuary. The Wailuku-Kahului Wastewater Reclamation Facility was constructed in 1973. In 1980, the Governor of Hawaii, through Executive Order 3006, set aside the property for sewage treatment purposes and vested control and management of the property with Maui County. The facility, which is also located on the parcel identified as TMK (2)3-8-001:188, occupies 18.76 acres of land and is also west of and adjacent to Kanahā Beach Park.

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18 U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii,* September 1997; County of Maui, Department of Finance, Real Property Tax Division. Second Tax Division, Zone 3, Section 8, Plat 01. 1 in. = 1000 ft. Maui County Tax Maps.

19 U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii,* September 1997; County of Maui, Department of Finance, Real Property Tax Division. Second Tax Division, Zone 3, Section 8, Plat 01. 1 in. = 1000 ft. Maui County Tax Maps.

20 U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii,* September 1997.

3.9.3 KAHULUI HARBOR

Kahului Harbor is located approximately one-quarter mile west of the proposed ConRAC facility. A vast majority of the harbor facilities are used to transport goods into and out of Maui and include facilities for transporting special commodities, such as natural gas and petroleum products. The Hawaii DOT-Harbors Division oversees the operations at the Kahului Harbor and owns most of the land within the harbor; however, various other entities, including the U.S. Coast Guard and Alexander & Baldwin, Inc., own various facilities and parcels at the harbor.

The primary commercial uses of the harbor include Matson and CSX Lines' overseas container services; Young Brothers' interisland cargo service; Pasha Hawaii's automobile transport; liquid bulk operations of Tesoro, Chevron, and the Maui Electric Company; and the dry bulk cargo operations of Hawaiian Cement and Ameron Hawaii, all of which are served by the harbor's three piers. The west breakwater includes a small boat ramp.

Hoaloha Park, a Maui County park, is located centrally between the two breakwaters and serves as home to various canoe clubs that host practices and regattas from their facilities.

3.9.4 PUBLIC ROADWAYS

Kahului Airport is served by a system of State and County roads. Hana Highway (State Route 36) runs south from Kahului Harbor. From its intersection with Dairy Road (State Route 380), Hana Highway generally serves as the southern border of the long-term Kahului Airport development as it curves east and then northeast. Haleakala Highway (State Highway 37) extends from Hana Highway adjacent to the Kanahā Pond Wildlife Sanctuary. Between its northern terminus at Hana Highway and the southern intersection with Hana Highway, Haleakala Highway is primarily a two lane road. South of Hana Highway, toward Pukalani, Haleakala Highway is a four-lane divided highway. State Route 380, which runs southwest from Kahului Airport, consists of Keolani Place, Dairy Road, and Kuihelani Highway.

Various County routes serve as connecting streets and arterials through the commercial and industrial portions of Kahului surrounding the Airport.

3.10 Scenic and Open Space Resources

As required by HRS 343, scenic and open space resources in the vicinity of the Study Area were identified. Scenic and open space resources west of the Airport include Iao Valley, the Kanahā Pond Wildlife Sanctuary, and the West Maui Mountains. Toward the southeast is Haleakala volcano, while the Pacific Ocean and Kanahā Beach Park lie to the north. The majority of undeveloped lands in the Central Maui isthmus are used for sugar cane cultivation. This agricultural use creates a vast expanse of sugar cane fields that establishes and dominates the open space character of the region.

Given the developed nature of the Kahului Airport area, scenic resources visible from the vicinity of the Airport are limited to those that rise above building rooflines and previously altered grades. The proposed ConRAC facility site is not located within a scenic corridor. Limited views of the Haleakala ridgeline are, however, available along sections of Keolani Place approaching and leaving the Airport terminal roadway.

Moreover, being located near mean sea level and buffered by relatively dense vegetation that lies between the alternative ConRAC facility site and the shoreline, the alternative site is not presently visible from offshore locations.

3.11 Past, Present, and Reasonably Foreseeable Future Actions

Cumulative impacts to environmental resources result from incremental effects of future actions combined with other past, present, and planned projects in the area. Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (federal, state, and local) or individuals. In accordance with NEPA, a discussion of cumulative impacts resulting from projects that are proposed, under construction, recently completed, or planned for implementation in the near future is required. For purposes of this EA, projects implemented within the last 5 years or proposed to be implemented within the next 5 years located within 1.0 mile of the Proposed Action were identified (see **Table 3-8**).

Table 3-8 Past, Present, and Future Actions within a Mile of the Airport

PROJECT	DATES	DESCRIPTION
Past Actions		
Alien Species Action Plan Building and Cargo Facility	Completed in 2007	Provides U.S. Department of Agriculture with a facility to inspect incoming goods for possible transport of alien plant or animal species. Cargo facility used by air cargo companies.
Alamo Rent A Car/National Car Rental Facility Improvements	Completed in 2010	Consolidation of Alamo and National rental car operations, new maintenance facility, additional gas pumps, and interior renovations.
Courtyard Maui Kahului Airport	Completed in June 2012	Four-story hotel adjacent to Costco Wholesale Warehouse.
Present Actions		
Maui Business Park Phase 2	Infrastructure improvements completed end of 2012; commercial development of lots to be completed 2013-2017	Commercial/industrial business park development located at the future intersection of Hana Highway and the Airport Access Road.
Costco Wholesale Warehouse Expansion and Gas Station Addition	2011-November 2012	30,000-square-foot expansion and addition of gas station and additional customer parking.
Future Actions		
Kahului Airport Access Road Phase I	June 2013 – 2014	Construction of the Airport Access Road between Puunene Avenue and Hana Highway.
Hana Highway Widening	March 2013 – March 2014	Widening of Hana Highway from Kaahumanu Avenue to vicinity of Airport Access Road.
Kahului Airport Fuel Farm	Summer 2013-2015	Relocation of the existing fuel farm.
Kahului Airport Access Road Phase II	June 2013 – December 2014	Construction of the Airport Access Road between Hana Highway and the Airport.
United Parcel Service (UPS) Relocation	2013	Relocation of the existing UPS facility to the air cargo area of the Airport.
Wailuku-Kahului Wastewater Reclamation Facility Tsunami Protection Project	2013-2014	Construction of an additional shoreline revetment to protect the facility from coastal wave events and potential tsunamis.
Runway 2-20 Rehabilitation	2016-2017	Repair to Runway 2-20.
Maui Medical Plaza	2017-2018	Six-story medical office facility and parking structure to be located adjacent to Kanahā Pond Wildlife Sanctuary, west of the proposed ConRAC facility.

SOURCES: Hawaii Department of Transportation - Airports Division, 2012; Hawaii Department of Transportation - Highways Division, http://hawaii.gov/dot/highways/modernization/maui, accessed: October 1, 2012; , Alexander & Baldwin Properties, *Maui Business Park - Phase 2, Kahului, HI 96732 Fact Sheet* www.mauibusinessparkphase2.com, accessed: October 1, 2012; Munekiyo & Hiraga, Inc., September 2012; Ricondo & Associates, Inc., October 2012.

PREPARED BY: Ricondo & Associates, Inc., October 2012.

4. Environmental Consequences and Mitigation Measures

The potential environmental consequences associated with the No Action Alternative and Alternative 5 (the Proposed Action)[1] are discussed in this chapter. The environmental categories evaluated, as specified in FAA Order 1050.1E[2] and FAA Order 5050.4B,[3] are as follows:

- Noise
- Compatible Land Use
- Socioeconomic Impacts, Environmental Justice, and Children's Health and Safety Risks
- Secondary (Induced) Impacts
- Air Quality
- Climate
- Water Quality
- Wetlands
- Floodplains
- Coastal Resources
- Fish, Wildlife, and Plants
- DOT Section 4(f) Lands
- Historic, Architectural, Archaeological, and Cultural Resources
- Light Emissions and Visual Impacts
- Farmlands
- Natural Resources and Energy Supply
- Hazardous Materials, Pollution Prevention, and Solid Waste
- Construction Impacts

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1 Alternative Site 5 is referred to as Alternative 5 in this chapter because the discussion is focused on construction and operation of the proposed improvements at this site, rather than the specific location.

2 Federal Aviation Administration, Order 1050.1E, *Environmental Impacts: Policies and Procedures,* Change 1, March 20, 2006.

3 Federal Aviation Administration, Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, April 28, 2006.

- Cumulative Impacts
- Other Considerations

Wild and scenic rivers are not present within the Study Area and therefore, would not be affected by the No Action Alternative or the build alternative, Alternative 5 (the Proposed Action), and are, therefore, not discussed in this chapter.

4.1 Noise

4.1.1 OVERVIEW

A determination of the potential noise effects of a project is based on evaluating noise exposure resulting from aviation activities on individuals and on noise-sensitive land uses. The comparison is made between the No Action and feasible alternatives during the same timeframes. The methodology to be used in the preparation of aircraft noise analyses is established in FAA Order 1050.1E. The FAA has determined that the cumulative noise energy exposure of individuals arising from aircraft noise must be established in terms of the yearly day/night average sound level (DNL) metric.

Under the No Action Alternative or Alternative 5 (Proposed Action), no change to existing air traffic patterns or aircraft movement areas would result, thus, no change to the noise exposure of individuals or noise-sensitive land uses to noise resulting from aviation activities would occur. Additionally, the No Action Alternative or Alternative 5 (Proposed Action) would not affect the number or type of aircraft operations at the Airport. Thus, no change to areas exposed to significant levels of aircraft noise in the Airport environs would occur under the No Action Alternative or Alternative 5 (Proposed Action).

4.1.2 METHODOLOGY

Noise contours for anticipated aviation activity at Kahului Airport in 2010 were completed as part of the 1997 Airport Improvements EIS.[4] The 2010 noise contours presented in the 1997 EIS were based on 253,700 annual operations (80,700 air carrier operations), which is more than twice the aviation activity experienced at OGG in 2011 (119,362 annual operations of which 38,746 were air carrier operations). For disclosure purposes, the 2010 noise contours from the 1997 EIS are provided in this EA; because of the disparity in activity levels assumed in the 1997 EIS compared to actual activity levels in 2011, these noise contours are larger than what would be anticipated if the noise contours were based on 2011 actual aviation activity at OGG. **Exhibit 4-1** depicts the DNL 65, 70, and 75 dB noise contours under the No Action Alternative and Alternative 5 (Proposed Action).

[4] U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii,* September 1997.

SOURCES: *Kahului Airport Environmental Impact Statement*, March 1996, digitized by Ricondo & Associates, Inc., 2012, (noise contour); Microsoft Inc., Bing Maps, ESRI, 2010 (aerial).
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 4-1

NORTH 0 2,500 ft.

Noise Contours for Year 2010

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4.1.3 NO ACTION ALTERNATIVE

The No Action Alternative would not affect (increase or decrease) the number of existing aircraft operations at Kahului Airport or the routing of aircraft in the air to and from the Airport. Thus, the No Action Alternative would not increase aviation-related noise.

4.1.4 ALTERNATIVE 5

No changes to existing air traffic patterns or aircraft movement areas would occur under Alternative 5. Additionally, Alternative 5 would not result in a change in the number or type of aircraft operations at the Airport compared with the No Action Alternative. Thus, no change in aircraft noise in the Airport environs would occur under Alternative 5, compared with the No Action Alternative. Thus, Alternative 5 would not increase aviation-related noise.

4.2 Compatible Land Use

4.2.1 OVERVIEW

According to Appendix A of 14 CFR Part 150[5] and FAA Advisory Circular 150/5020-1[6], a proposed action is considered to have a significant impact on land use compatibility if it causes significant increases in noise exposure over residential or other noise-sensitive land uses—such as schools, parks, and historic buildings—within areas exposed to aircraft noise of DNL 65 or higher. Neither the No Action Alternative nor Alternative 5 (the Proposed Action) would result in any change in aircraft noise in the Airport environs (see Section 4.1).

4.2.2 METHODOLOGY

The existing onsite and offsite land uses and the surrounding area land use plans and policies were described in Section 3.3. Offsite land uses consist of adjacent agricultural land, commercial and light industrial areas, and recreation areas. The relevant offsite land use plan is the Wailuku-Kahului Community Plan. The significance criteria used in assessing the impacts of the Proposed Action related to land use are discussed below.

In accordance with FAA Order 1050.1E, the Proposed Action is compatible with existing and future land uses if the following apply:

- The noise analysis conducted for the Proposed Action and alternatives concludes that there is no significant impact;
- Documentation is provided within the EA to support the airport sponsor's assurance under 49 U.S.C. 47107(a)(10) of the 1982 Airport Act that appropriate action is being taken to the extent reasonable to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and

[5] Title 14 Code of Federal Regulations Part 150, *Airport Noise Compatibility Planning*, January 18, 1985, as amended.

[6] Federal Aviation Administration, Advisory Circular 150/5020-1, *Noise Control and Compatibility Planning for Airports*, August 5, 1983.

purposes compatible with normal airport operations (see **Appendix D** for Land Use Assurance Letter); and

- The Proposed Action or alternatives are consistent with plans (existing at the time the project is approved) of public agencies for development of the area in which the airport is located 49 U.S.C. 47106(a)(10).

4.2.3 NO ACTION ALTERNATIVE

The No Action Alternative would not require any amendment to the Wailuku-Kahului Community Plan or issuance of building permits. The existing uses of the alternative site would continue and remain consistent with the County's General Plan and the Wailuku-Kahului Community Plan.

4.2.4 ALTERNATIVE 5

The alternative site is located in the Wailuku-Kahului Community Plan region, which is one of nine Community Plan regions established within Maui County. Planning for each region is guided by the respective Community Plans, which are designed to implement the Maui County General Plan. Land use guidelines are set forth on the Wailuku-Kahului Community Plan Land Use Map. As described in Section 3.3, the project site for Alternative 5 is designated "AP, Airport" (see Exhibit 3-4). As defined in the Wailuku-Kahului Community Plan, lands designated as "Airport" include: "... all commercial accessory uses and general aviation airports and their accessory uses."

The proposed ConRAC facility, which is an accessory use to Airport operations, is consistent with the Wailuku-Kahului Community Plan land use designations described in Section 3.3. The proposed ConRAC facility would include automobile parking lots for travelers and facilities for car rental operations ("u-drive business"). The ConRAC facility would conform to standards of development as set forth in the Maui County Code.

The various components of Alternative 5 would not result in a land use that is incompatible with the Wailuku-Kahului Community Plan or Maui County zoning. Therefore, Alternative 5 (the Proposed Action) would not have an impact in terms of conflict with applicable plans.

4.3 Socioeconomic Impacts, Environmental Justice, and Children's Health and Safety Risks

4.3.1 OVERVIEW

The No Action Alternative and Alternative 5 were evaluated for the potential to result in the relocation of residences and businesses, as well as the potential to alter surface transportation patterns, divide established communities, disrupt orderly planned development, or create an appreciable change in employment. The potential for the No Action Alternative or Alternative 5 to result in disproportionately high and adverse human health or environmental effects on minority or low-income populations or disproportionate health and safety risks to children is also discussed in this section.

4.3.2 METHODOLOGY

The potential for the build alternative (Alternative 5) to cause social impacts or community disruption was evaluated qualitatively. Potential conflicts with Executive Orders addressing environmental justice and the protection of children were evaluated based on the requirements of those orders and implementing guidance published by the federal government.

4.3.2.1 Socioeconomic Impacts

FAA guidance contained within Order 1050.1E (see Appendix A, Section 16) for the analysis of socioeconomic impacts states that the Proposed Action or any of its build alternatives would have a significant population and housing impact if it would:

- Displace a substantial number of people;
- Displace a substantial number of residential units;
- Substantially reduce the levels of service of roadways serving the airport and its surrounding communities;
- Create a substantial loss in the community tax base; and/or
- Induce substantial population growth that would affect the population/housing balance.

Based on these guidelines, an alternative would have a significant socioeconomic impact if it would lead to substantial, adverse physical changes in the environment.

4.3.2.2 Environmental Justice

Environmental justice was assessed to determine whether the Proposed Action would conflict with the requirements of Executive Order 12898.[7] This Executive Order directs federal agencies "to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States." Based on this guidance, the Proposed Action would have a significant environmental justice impact if it would disproportionately affect minority or low-income populations. Section 3.4 provides demographic information for the Study Area; because there are no concentrations of minority or low-income populations in the Study Area, no environmental justice impacts would occur as a result of the Proposed Action.

[7] Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, Federal Register Vol. 59, No. 32, p. 7629 (February 16, 1994).

4.3.2.3 Protection of Children

Impacts to the protection of children were assessed with regard to whether the Proposed Action would conflict with the requirements of Executive Order 13045.[8] Under this Executive Order, each federal agency:

(a) shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and

(b) shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.

4.3.3 SOCIOECONOMIC IMPACTS

4.3.3.1 No Action Alternative

The No Action Alternative would not result in any residential or business relocations, division or disruption of established communities, alteration of surface transportation patterns, disruption of orderly planned development, or appreciable changes in employment.

4.3.3.2 Alternative 5

The alternative site for the proposed ConRAC facility is located on Airport property in an area where no housing has been developed or residents are located. Construction and operation of the proposed ConRAC facility on the site would not result in any residential relocations, division or disruption of established communities, disruption of orderly planned development, or appreciable changes in employment. The Alternative 5 site was designated for public parking expansion in the 1997 Environmental Impact Statement (EIS) for Kahului Airport improvements[9] and on the current ALP. The proposed ConRAC facilities have been planned and would be designed to provide adequate facilities for existing and future rental car demand, enabling the rental car companies to provide an adequate level of service to meet demand at the Alternative 5 site (the Proposed Action).

Relocation of Businesses

Alternative 5 would require relocation of the existing on-Airport rental car companies to the proposed ConRAC facility. The ConRAC facility would include space for ready/return cars, a QTA area, customer service, and some rental car storage. The remainder of the rental car company functions, such as heavy maintenance, rental car overflow parking, and additional administrative functions, would be accommodated at the rental car companies' existing facilities. The specific terms of the relocation would be negotiated with the rental car companies.

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[8] Executive Order 19883, *Protection of Children from Environmental Health Risks and Safety Risks*, Federal Register Vol. 62, No. 78, p. 19883 (April 23, 1997).

[9] U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii*, September 1997.

Alternative 5 would require relocation of the UPS facility at the Airport. This facility serves as the distribution center for the island, collecting parcels for transport via aircraft to destinations outside of Maui, and receiving shipments for distribution to locations on Maui. The UPS facility would be relocated to a site next to the existing cargo building, which is adjacent to the cargo apron at the southwest end of Runway 2-20 (see **Exhibit 4-2**). Relocation of the UPS facility was originally approved as part of the 1997 EIS on-Airport improvements to provide for expansion of public parking areas at the Airport. Plans for the relocated UPS facility have been approved by the Maui Planning Commission. An SMA permit for relocation of the UPS facility was issued in 2009; a time extension for the permit was approved in 2012.

Surface Transportation

Alternative 5 was analyzed for its effects on surface transportation. The proposed improvements would provide for a ConRAC facility which would improve traffic on existing roads, significantly reduce traffic congestion on Dairy Road and Keolani Place, and lead to an overall reduction in the number of rental cars circulating through the passenger terminal roadways.

The results of the 2012 (Baseline), 2015, and 2020 roadway demand capacity analysis for the existing roadway configuration were analyzed and evaluated based on their Level of Service (LOS). The LOS is a measure of roadway congestion, which ranks congestion and delay on roadway segments from LOS A (excellent) to LOS F (failure) conditions. The threshold of acceptable roadway LOS during peak periods at most airports is typically LOS D or better.

All roadway links evaluated for Alternative 5, from 2012 through 2020, in all traffic scenarios achieved a LOS of C or better. Therefore, there are no impacts attributed to project related traffic throughout the 2015 and 2020 planning horizon. The methodology, analysis, and detailed results of the surface transportation study are presented in **Appendix E**.

4.3.4 ENVIRONMENTAL JUSTICE

The Alternative 5 site is located on Airport property, as noted above, in an area where no housing has been developed and no residents are located. Therefore, the No Action Alternative or implementation of Alternative 5 (the Proposed Action) would not result in disproportionately high and adverse human health or environmental effects on minority and low-income populations.

4.3.5 CHILDREN'S HEALTH AND SAFETY RISKS

The Alternative 5 site is located on Airport property in areas where no housing has been developed or residents are located. The site is not located near a school or other facility where children's activities would occur. The nearest residential area is located west of the Airport in between Puunene Avenue and Hukilike Street. This residential area is located approximately 1.1 miles southwest of the Alternative 5 site. Therefore, the No Action Alternative or implementation of Alternative 5 (the Proposed Action) would not result in adverse effects on the health or safety of children.

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SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); State of Hawaii, Department of Transportation-Airports Division, April 19, 2011; Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 4-2

NORTH 0 800 ft.

United Parcel Service Facility

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 1-3 Existing Rental Car Company Sites.dwg_Layout: EA Ex 4-2_Sep 06, 2013, 11:14am

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4.3.6 MITIGATION MEASURES

Implementation of Alternative 5 (the Proposed Action) would require relocation of the temporary UPS facility. Relocation of this facility was originally approved as part of the proposed surface parking lot expansion depicted on the ALP and approved in the 1997 EIS for Airport improvements. HDOT-A and UPS have obtained approval of design plans and the required SMA permit from the Maui Planning Commission for relocation of the UPS facility on Airport property. The relocation of the UPS facility is the responsibility of UPS; the time taken to relocate their facility is due to business decisions UPS has made on when they needed to update and relocated their facilities.

The relocation of the existing car rental facilities will be done in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act).

4.4 Secondary (Induced) Impacts

Airport actions can involve the potential for induced or secondary impacts on surrounding communities. Examples of these impacts include shifts in patterns of population movement and growth, public service demands, and changes in business and economic activity to the extent influenced by airport development.

There would be no impacts on population or public service demand associated with the No Action Alternative or implementation of Alternative 5 (the Proposed Action). The various components of the Proposed Action would have no impact on performance objectives of police protection, schools, parks, or other public service facilities. The various components of the Proposed Action would not generate any increase in the number of students or number of park users. The Proposed Action would not result in additional police or fire protection services compared to existing conditions. Therefore, no impact to these public services would be anticipated.

Alternative 5 would provide for additional rental car and/or employee overflow parking. A parking study for employee and public parking at Kahului Airport was conducted as part of the Site Selection Study for the ConRAC facility. Taking into account the Draft Airport Master Plan forecast, the FAA Terminal Area Forecast, and demand elasticity associated with the neighbor island market, the study determined that over 700 additional parking stalls would be needed over the 20-year planning horizon. The HDOT-A has not finalized the Kahului Airport Master Plan Update. While HDOT-A is considering the extension of Runway 5-23 as part of the Airport Master Plan Update, no decision has been made on a Runway 5-23 extension, and the Proposed Action is proposed regardless of whether Runway 5-23 is extended; the Proposed Action is not a component of any proposal to move or extend Runway 5-23 at the Airport. The design of the ConRAC facility accounted for this future parking stall demand on the top (3rd) level of the facility, which provides 719 parking places. When demand for public parking stalls materializes, the existing employee parking (located on the makai side of the surface parking lot fronting the passenger terminal, behind the Airport public parking) would be relocated to the top level of the ConRAC facility to allow public parking to expand within the existing surface parking lot fronting the passenger terminal. Fire protection standards and procedures specific to the ConRAC facility would need to be evaluated and updated during construction.

4.5 Air Quality

4.5.1 OVERVIEW

The primary sources of guidance for assessing potential air quality impacts are FAA Orders 1050.1E and 5050.4B, and the *Air Quality Procedures for Civilian Airports and Air Force Bases* (Airport Air Quality Handbook).[10] Typically, an emissions inventory is prepared for each reasonable alternative, including the No Action Alternative. Additional analyses, including dispersion modeling or roadway intersection hot spot analyses, are not typically required if the estimated emissions of each criteria pollutant do not exceed thresholds listed in the general conformity regulations. Information presented in the Airport Air Quality Handbook can be used as a guide to determine whether an NAAQS assessment[11] needs to be performed for a proposed action.

4.5.2 CONFORMITY

The entire State of Hawaii is listed as unclassifiable/attainment for all NAAQS.[12] Therefore, the FAA is not required to make a conformity determination.

4.5.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, the rental car companies would continue operating in their current locations at the Airport. Each company would continue to operate its individual rental car shuttles, and rental car customers would continue to circulate through the Airport terminal roadway system to access the rental car ready/return lots. Emissions from rental car operations, including vehicle emissions, would continue as they are today.

4.5.4 ALTERNATIVE 5

The Proposed Action would provide a ConRAC facility that would improve traffic on existing roads (both on- and off-Airport), significantly reduce traffic congestion on Dairy Road and Keolani Place, and lead to an overall reduction in the number of rental cars circulating through the passenger terminal roadway system. Additionally, under Alternative 5 (the Proposed Action) shuttle bus trips would be reduced. As the Airport is located in an unclassifiable/attainment area for all criteria pollutants, an air quality analysis is not required. However, it can be assumed that the reduced traffic congestion and the reduced distance of shuttle bus trips would result in an overall reduction in the emissions produced by Airport activities under Alternative 5 compared with the No Action Alternative.

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[10] Federal Aviation Administration, *Air Quality Procedures for Civilian Airports and Air Force Bases*, Report No. FAA-AEE-97-03, Washington, DC, April 1997, including the addendum, Report No. FAA-AEE-04-03, September 2004.

[11] When a Proposed Action could cause or contribute to an exceedance of the NAAQS, pollutant concentrations are estimated for criteria pollutants of interest through air dispersion modeling. The FAA's Emissions and Dispersion Modeling System (EDMS) incorporates algorithms from the U.S. EPA's AERMOD dispersion model.

[12] Title 40, Code of Federal Regulations, Part 81 – Designation of Areas for Air Quality Planning Purposes, Subpart C-Section 107, Attainment Status Designations, § 81.312, Hawaii.

The QTA facilities for rental car companies include new storage tanks and vehicular fueling hoses within the proposed ConRAC facility. The existing fueling facilities would remain in place and continue to be used for overflow vehicles and new vehicles; however, most of the rental car fueling would occur at the ConRAC facility. Although new fueling facilities would be added, the overall fuel flow would be the same under the No Action Alternative and Alternative 5. Therefore, any emissions associated with fueling would be expected to be the same under all alternatives.

Considered in its entirety, the proposed ConRAC facility would not result in additional aircraft activity or associated automobile traffic. The proposed ConRAC facility would reduce traffic congestion on the terminal roadways, but it would not affect airfield capacity or the airfield configuration; therefore, no increase in aircraft activity is anticipated to occur as a result of the Proposed Action. Alternative 5 would not result in a measurable increase in rental car transactions compared with the No Action Alternative nor would it result in an increase in fuel flowage associated with rental car transactions. However, power plant emissions may be reduced if solar photovoltaic panels are installed on the roof of the ConRAC facility, and hydrocarbons, CO, and PM_{10} emissions would be reduced by decreasing the number of vehicle miles traveled in the Airport vicinity. In addition, implementation of Alternative 5 would reduce shuttle bus travel distances. Returning rental car customers would access the ConRAC facility without needing to circulate through the Airport terminal roadway system. Therefore, a reduction in pollutant emissions would be expected under Alternative 5 compared with the No Action Alternative. The consolidation of ready/return rental car operations at one facility would not conflict with or obstruct implementation of any air quality plans, nor would it violate any air quality standards.

For purposes of evaluating the potential for short-term increases in emissions associated with construction of Alternative 5, construction-related emissions were analyzed, as discussed in Section 4.18, "Construction Impacts."

4.5.5 CLIMATE CHANGE AND GREENHOUSE GASES

Of growing concern is the potential impact of proposed projects on climate change. Greenhouse gases (GHGs) are those that trap heat in the earth's atmosphere. Naturally occurring and anthropogenic (human-made) GHGs include water vapor (H_2O), carbon dioxide (CO_2),[13] methane (CH_4), nitrous oxide (N_2O), and O_3.[14]

Research has shown that there is a direct link between fuel combustion and GHG emissions. Therefore, sources that require fuel or power at an airport are the primary sources of GHG generation. Aircraft are probably the most often cited air pollutant source, but they produce the same types of emissions as cars. Aircraft jet engines, similar to many other vehicle engines, produce CO_2, H_2O, nitrogen oxides (NO_x), CO,

[13] All GHG inventories measure carbon dioxide emissions; some inventories also include different GHGs.

[14] Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. For example, chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) are halocarbons that contain chlorine, while halocarbons that contain bromine are referred to as bromofluorocarbons (i.e., halons) or sulfur (sulfur hexafluoride: SF_6).

oxides of sulfur (SO_x), unburned or partially combusted hydrocarbons (also known as volatile organic compounds or VOCs), particulates, and other trace compounds.

In January 2012, the FAA released a memorandum providing guidance on the consideration and evaluation of GHGs and climate under NEPA.[15] The guidance supplements FAA Order 1050.1E to identify climate as a category of potential environmental impact that should be considered in EAs and EISs. Because the proposed ConRAC facility would not cause a change in aircraft operations or routes, Alternative 5 would not cause a net change in GHG emissions from aircraft operations compared with the No Action Alternative.

According to most international reviews, aviation-related emissions account for a small but potentially important percentage of anthropogenic (human-made) GHGs and other emissions that contribute to global warming. The Intergovernmental Panel on Climate Change estimates that global emissions from aircraft operations account for about 3.5 percent of the total quantity of GHGs from human activities.[16] The U.S. General Accounting Office reports that aviation in the United States accounts "for about 3 percent of total U.S. greenhouse gas emissions from human sources" compared with other industrial sources, including the remainder of the transportation sector (23 percent) and industry (41 percent).[17]

The scientific community is developing areas of further study to be able to more precisely estimate aviation's effects on the global atmosphere. The FAA is currently leading or participating in several efforts intended to clarify the role that commercial aviation plays in GHGs and climate change. The most comprehensive program geared toward quantifying the climate change effects of aviation is the multiyear Aviation Climate Change Research Initiative funded by the FAA and the National Aeronautics and Space Administration.

The Initiative will reduce key scientific uncertainties in quantifying aviation-related climate impacts and provide timely scientific input to inform policymaking decisions. The FAA also funds Project 12 of the Partnership for Air Transportation Noise & Emissions Reduction Center of Excellence research initiative to quantify the effects of aircraft exhaust and contrails on global and U.S. climate and atmospheric composition. In addition, a guidebook on preparing airport GHG emission inventories was prepared under the Transportation Research Board's Airport Cooperative Research Program.[18]

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15 U.S. Department of Transportation, Federal Aviation Administration, Order 1050.1E, Change 1, Guidance Memo #3, "Considering Greenhouse Gases and Climate under the National Environmental Policy Act (NEPA): Interim Guidance." To: FAA Lines of Business and Managers with NEPA Responsibilities. From: Julie Marks, Manager, Environmental Policy and Operations, prepared by Thomas W. Cuddy, Environmental Specialist, FAA, Airports Planning and Environmental Division, January 12, 2012.

16 Intergovernmental Panel on Climate Change report as referenced in *U.S. General Accounting Office (GAO) Environment: Aviation's Effects on the Global Atmosphere Are Potentially Significant and Expected to Grow*; GAO/RCED-00-57, February 2000, p. 4.

17 Intergovernmental Panel on Climate Change report as referenced in *U.S. General Accounting Office (GAO) Environment: Aviation's Effects on the Global Atmosphere Are Potentially Significant and Expected to Grow*; GAO/RCED-00-57, February 2000, p. 14; GAO cites available EPA data from 1997.

18 Airport Cooperative Research Program, Transportation Research Board, ACRP Report 11, *Guidebook on Preparing Greenhouse Gas Emission Inventories*, 2009.

Based on FAA data, aircraft operations at Kahului Airport represent less than 1.0 percent of U.S. aircraft operations. Therefore, assuming that GHGs occur in proportion to levels of activity, GHG emissions associated with existing and future aircraft operations at the Airport would continue to be expected to represent far less than 0.001 percent of U.S.-based GHGs with implementation of the Proposed Action. As Alternative 5 (the Proposed Action) would not cause a change in aircraft operations or routes and would likely result in a decrease of emission from ground vehicles, no net change in GHG emissions would occur compared with the No Action Alternative.

Alternative 5 would not increase the number of passengers or rental car drivers compared with the No Action Alternative; therefore, GHG emissions from personal and rental car traffic at the Airport would not increase as a result of the Proposed Action. The Proposed Action would reduce the distance rental car customers would have to drive to return their vehicles compared with the No Action Alternative, would eliminate the need for rental car customers to circulate through the terminal roadway system, and would reduce the need for rental car shuttle buses operations. Thus, Alternative 5 would result in a reduction in vehicle emissions compared with the No Action Alternative.

4.6 Water Quality

4.6.1 OVERVIEW

In accordance with FAA Orders 1050.1E and 5050.4B, the Sponsor must follow local, state, tribal, and federal ordinances and regulations in addressing impacts to the quality of water resources. The Clean Water Act provides the authority to establish water quality standards, control discharges, develop waste treatment management plans and practices, prevent or minimize the loss of wetlands, protect aquifers and sensitive ecological areas (such as wetlands), and regulate other issues concerning water quality. Section 1424(e) of the Safe Drinking Water Act requires consultation with the U.S. EPA if the Proposed Action has the potential to contaminate an aquifer designated by the U.S. EPA as a sole or principal source of drinking water for the area.

FAA Order 1050.1E states that significant impacts on water quality include the following:

- If the Proposed Action would impound, divert, drain, control, or otherwise modify the waters of any stream or other body of water, the Fish and Wildlife Coordination Act applies.
- Exceedances of water quality standards and occurrences of water quality problems that cannot be avoided or satisfactorily mitigated would be identified as significant impacts.

The Hawaii Department of Health administers the National Pollutant Discharge Elimination System (NPDES) permit program in Hawaii, pursuant to the Clean Water Act. The HDOT-A has a NPDES General Permit for industrial storm water discharges for the Airport and has developed a Storm Water Pollution Control Plan to minimize discharges of pollutants into storm water and to maintain compliance with this general permit.

4.6.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, there would be no change to the impervious surface area and, therefore, no potential for additional impacts to aquifer recharge. The No Action Alternative would not involve grading; therefore, there is no potential for downstream erosion, sedimentation, or modified drainage patterns. There is no earthwork associated with the No Action Alternative and, accordingly, no potential for pollution and contamination nor a need for sediment and erosion control. The No Action Alternative would not affect any of the Airport's NPDES permit provisions.

4.6.3 ALTERNATIVE 5

Alternative 5 would include the development of new structures and result in increased impervious surfaces on the Airport, on mostly undeveloped land. In general terms, such development could increase sediment loads to surface water runoff compared with the No Action Alternative (i.e., vegetated portions of the site would be converted to paved surfaces and building area), and increase pollutant loads related to metals, organic substances, trash and debris, and oils and grease. Potential impacts on water quality resulting from construction and operation of the proposed ConRAC facility would be associated with increased non-point-source pollution of near shore waters. These heightened pollution levels would result from: (a) increased contaminated surface water runoff and drainage from the Airport and surrounding roadways; (b) increased sediment loading of near shore waters because of the larger area to be served by the Airport drainage system; and (c) increased opportunities for petroleum hydrocarbon contamination of runoff waters. The existing peak storm water runoff at Alternative Site 5 is 67.64 cubic feet per second. The Proposed Action would increase the peak storm water flow by 72.45 cubic feet per second to 140.09 cubic feet per second during the 50-year 1-hour storm. Two storm water detention basins are proposed as part of the Proposed Action (see Exhibit 3-1) to accommodate the increased runoff associated with development of Alternative 5 site. The storm water detention basins would be designed, engineered, constructed, and maintained in compliance with FAA's Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants on or Near Airports*, Section 2-3b. On-site generated storm water would be collected into the two detention basins and discharged at a controlled rate into the existing drainage system. Therefore, there would be no adverse drainage impacts to the surrounding areas or the existing drainage system.

Water quality best management practices (BMPs) would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements. Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

The need for additional wastewater services that would be generated by implementation of Alternative 5 would be restrooms for use by rental car customers and employees, and the car washing facility included as

part of the rental car QTA facility. The proposed ConRAC facility's restrooms and potable water would connect to the existing sewer system (the Airport is located within the Kahului Sewer Service Area). Potable water for restrooms, drinking water, car wash facilities, etc., would come from the Maui County Department of Water Supply. The use of existing car wash facilities at the Airport would be reduced, which would offset the demand for wash water under the build alternative. The car washing facilities would have a separate collection system that would include a recycling system to reduce the demand for water and minimize the amount of wastewater generated by car washing activities; the total estimated water demand for car wash facilities and restrooms is approximately 8,750 gallons per day. No wastewater from the car washing facilities would drain into the County sewer system. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. The provision of restroom facilities is not expected to result in a significant increase in wastewater generation and the car washing facility in the QTA area would replace the existing facilities. Alternative 5 would not result in an increase in wastewater or require new water or wastewater treatment facilities beyond those that already exist.

With implementation of BMPs and adherence to the SWMP and NPDES operating permit for the Airport, no significant impacts to water quality would be anticipated as a result of the Proposed Action.

4.7 Wetlands

4.7.1 OVERVIEW

Executive Order 11990 requires federal agencies to minimize the destruction, loss, or degradation of wetlands resulting from their actions. Section 404 of the Clean Water Act, as amended, requires regulation of discharges or fill matter into Waters of the United States. The U.S. ACE has primary responsibility for implementing, permitting, and enforcing the provisions of Section 404.

4.7.2 METHODOLOGY

A field survey of the Alternative 5 site was conducted to determine the presence of wetlands and/or Waters of the United States. The Proposed Action would have a significant impact if it would result in the loss or degradation of wetlands habitat considered jurisdictional under the Clean Water Act.

4.7.3 NO ACTION ALTERNATIVE

The No Action Alternative would result in no grading, development, or change to the Airport; therefore, no impacts to wetlands or Waters of the United States would occur under the No Action Alternative.

4.7.4 ALTERNATIVE 5

As identified in Section 3.7.3 of this EA, there are no wetlands present on or immediately adjacent to the Alternative 5 site. However, Kalialinui Stream, which lies in a culvert beneath the site, is a jurisdictional Waters of the United States. Because this stream passes directly under the site in a buried concrete culvert, it would not be affected by the construction or operation of the proposed ConRAC facility if it is protected during construction and through implementation of BMPs. Kalialinui Stream would continue to serve as an ocean

outlet for storm water originating on the Airport and as a key element of the Airport storm water drainage system.

4.7.5 MITIGATION MEASURES

The culvert in which Kalialinui Stream is located beneath the Alternative 5 site would need to be protected during construction (if Alternative 5 is implemented) to prevent impacts to this Waters of the United States. In addition, BMPs would need to be implemented to prevent polluted runoff or inadvertent spills from reaching the stream during operation of the proposed ConRAC facility.

Water quality best management practices (BMPs) would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements. Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

4.8 Floodplains

4.8.1 OVERVIEW

Executive Order No. 11988 was enacted to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development. The Executive Order was issued in furtherance of NEPA, the National Flood Insurance Act of 1968, and the Flood Disaster Act of 1973.

Floodplains are defined as lowland and flat areas adjoining waters that are subject to a 1.0 percent or greater chance of flooding in any given year (i.e., a 100-year flood event).

4.8.2 METHODOLOGY

The Proposed Action would cause a significant floodplain impact if it would impose a flood hazard on other properties, or place development wholly or partially within a FEMA-mapped 100-year floodplain such that substantial flood hazards would result. Impact significance also is assessed with regard to Executive Order 11988.[19] Under this Executive Order, if an action is allowed to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains. Federal

[19] Executive Order 11988, *Floodplain Management*, Federal Register Vol. 42, p. 26951 (1977).

agencies must take action to avoid development in the 100-year floodplain to reduce hazard and risk associated with floods; to minimize the impact of floods on human safety, health, and welfare; and to restore and preserve the natural and beneficial value of the base floodplain. If the only practicable alternative requires siting in a floodplain, the agency must (i) design or modify its action in order to minimize potential harm to or within the floodplain and (ii) prepare and circulate a notice containing an explanation of why the action is proposed to be located in the floodplain.

If the Proposed Action is located within a floodplain, U.S. DOT Order 5650.2, *Floodplain Management and Protection* (April 23, 1979), requires the EA to include a detailed analysis; the analysis should discuss any risk to, or resulting from, the action, the impacts on natural and beneficial floodplain values, the degree to which the action provides direct or indirect support for development in the floodplain, and measures to minimize harm or to restore or preserve the natural and beneficial floodplain values affected by the project.

According to U.S. DOT Order 5650.2, an encroachment resulting in one or more of the following construction or flood-related impacts results in a "significant encroachment":

1. A considerable probability of loss of human life;
2. Likely future damage associated with the encroachment that could be substantial in cost or extent, including interruption of service on or loss of a vital transportation facility: and
3. A notable adverse impact on natural and beneficial floodplain values.[20]

If the preferred alternative involves significant encroachment of the floodplain, the EA must include (1) the FAA's finding that the proposed action is the only practicable alternative; and (2) supporting documentation reflecting consideration of alternatives to avoid or reduce adverse impacts on the floodplain.

In agreement with U.S. DOT Order 5650.2 and Executive Order 11988 (Section 2a), FAA Order 1050.1E Paragraph 9.2d states that "A floodplain finding is required in cases of significant encroachment. This finding confirms that there is no practicable alternative to placing the project in the floodplain and that all measures to minimize harm will be included in the project."

Potential floodplain impacts were evaluated by comparing the location of Alternative 5 elements with floodplain mapping prepared by FEMA. According to the FEMA FIRM for the Airport, the northeastern end of Runway 2-20, portions of Runway 5-23, and all of the beach areas fall within the areas subject to 100-year flood and additional velocity hazard (i.e., the tsunami flood zone). Other portions of the Airport and all of the beach areas fall within the 100-year flood zone (see Exhibits 3-5 and 3-6). As described in Section 3.7.4, "Floodplains," the HDOT-A is coordinating with the Maui County Planning Department on potential effects to the 100-year floodplain. The HDOT-A is in the process of submitting an application for a Letter of Map

[20] As defined in U.S. DOT Order 5650.2, Section 4(k), "Natural and Beneficial Floodplain Values" include but are not limited to: natural moderation of floods, water quality maintenance, groundwater recharge, fish, wildlife, plants, open space, natural beauty, scientific study, outdoor recreation, agriculture, aquaculture, and forestry.

Revision (LOMR) for the Kahului Airport area, based on a flood study completed for the Airport fuel farm project.[21]

4.8.3 NO ACTION ALTERNATIVE

The No Action Alternative does not include any development on or adjacent to the 100-year floodplain; therefore, this alternative would have no impacts to a 100-year floodplain and there would be no increased potential for floodplain impacts.

4.8.4 ALTERNATIVE 5

The Alternative 5 site encroaches on the base floodplain, FEMA Zone AE, which corresponds to the 100-year floodplain associated with Kalialinui Stream. The HDOT-A completed a flood study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport fuel farm project. This flood study determined that the Alternative 5 site is outside of the floodway as shown on Exhibit 3-6. A regulatory floodway "means the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height" (44 CFR 59.1).

To determine if a "significant encroachment" on the base floodplain would result from the construction and operation of a ConRAC facility at Alternative Site 5, the Proposed Action was evaluated in accordance with the three criteria listed in U.S. DOT Order 5650.2.

1. **A considerable probability of loss of human life:** The lowest occupied floor of the proposed ConRAC facility would be constructed above the base flood elevation (the level of floodwater expected to occur once in 100 years) in accordance with the effective FIRM (refer to Exhibits 3-5 and 3-6). The lowest level of the proposed ConRAC facility would be constructed within the base flood elevation level. However, the lowest level of the ConRAC facility would consist of an unoccupied open area used for vehicle storage. This level would be devoid of any offices or occupied areas; all occupied portions of the ConRAC facility would be located above the base flood elevation.

   There is no private property or residential land uses located down-gradient of Alternative Site 5; thus, the proposed development would not impose a flood hazard on other properties or impair human health, safety, or welfare. In addition, two storm water detention basins would be constructed as part of this alternative to control storm water runoff and provide some compensatory floodplain storage. The detention basins would be designed in compliance with FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants on or Near Airports*, to minimize their attractiveness to wildlife.

2. **Likely future damage associated with the encroachment that could be substantial in cost or extent, including interruption of service on or loss of a vital transportation facility:** The lowest level is the only portion of the proposed ConRAC facility that would be located within the base flood

[21] R.M. Towill Corporation, *Drainage Report (Final), Kahului Airport Fuel Farm Flood Study, Kahului, Maui, Hawaii*, July 2012.

elevation level. The proposed ConRAC facility is not considered a "vital transportation facility." Potential future damage to the ConRAC facility associated with floodplain encroachment would not impact operations at Kahului Airport (which is considered a vital transportation facility). As part of Alternative 5, two storm water detention basins would be constructed to control storm water runoff and provide some compensatory floodplain storage which would help reduce the potential for future flood damage that may be substantial in cost or extent.

3. **A notable adverse impact on natural and beneficial floodplain values:** The portion of Kalialinui Stream that flows through Alternative Site 5 is located within an underground culvert. The underground culvert runs parallel to Hemaloa Street, traversing approximately one-half mile of Airport property from Keolani Place to Kala Road. The proposed ConRAC facility would be constructed above the Kalialinui Stream underground culvert and would not affect the stream flow. Adjacent agricultural lands would not be impacted. Since Kalialinui Stream is located in an underground culvert at the Alternative 5 site, it provides little to no natural and beneficial floodplain values. Any existing floodplain benefits to fish, wildlife and plants and natural beauty at Alternative Site 5 would not be adversely impacted by the Proposed Action. No scientific studies, aquaculture, outdoor recreation, and/or forestry uses are associated with Kalialinui Stream on Airport property; neither would any such uses off Airport property be impacted by construction and operation of a ConRAC facility at Alternative Site 5. Since the Proposed Action would encroach upon the 100-year floodplain, two storm water detention basins would be constructed as part of Alternative 5 to control storm water runoff and provide some compensatory floodplain storage, minimizing impacts to groundwater recharge.

Therefore, although the Alternative 5 site is located within the 100-year floodplain, Alternative 5 does not involve a "significant encroachment" of the floodplain per U.S. DOT Order 5650.2 and does not require a floodplain finding. However, HDOT-A has incorporated design features and measures to minimize potential effects to floodplains and determined that there is no practicable alternative to the Proposed Action. Alternative 5 would not have a high probability of loss of human life, substantial encroachment-related costs or damage (including interrupting aircraft service or loss of a vital transportation facility), and would not cause adverse impacts on natural and beneficial floodplain values. Additionally, mitigation measures would be included in the design and function of the Proposed Action to ensure that the base flood elevation down gradient of the site does not increase due to construction of the proposed facility.

4.8.5 MITIGATION MEASURES

The culvert in which Kalialinui Stream is located beneath the Alternative 5 site would need to be protected during construction (if Alternative 5 is implemented) to prevent impacts to stream flow. If the proposed ConRAC facility is constructed, the lowest occupied floor would be above the base flood elevation level. The ConRAC facility would be constructed in accordance with the standards and criteria established in Executive Order 11988 and would be consistent with the National Flood Insurance Program. In addition, two storm water detention basins would be constructed to control storm water runoff and provide some compensatory floodplain storage. The HDOT-A would submit hydrologic and hydraulic data corresponding to any changed conditions within the 100-year floodplain associated with Kalialinui Stream within six months of completion of the Proposed Action.

4.9 Coastal Resources

4.9.1 OVERVIEW

The Coastal Zone Management Act of 1972 ensures the effective management, beneficial use, protection, and development of the coastal zone. Coastal Zone Management Programs, prepared by states according to guidelines issued by the National Oceanic and Atmospheric Administration, are designed to address issues affecting coastal areas.

The Coastal Barriers Resources Act of 1982 prohibits federal financing for development within the Coastal Barrier Resources System, which consists of undeveloped coastal barriers along the Atlantic and Gulf Coasts. The legislation was amended by the Coastal Barrier Improvement Act of 1990 to include undeveloped coastal barriers along the shores of the Great Lakes. This act does not apply to the State of Hawaii.

4.9.2 METHODOLOGY

Although the FAA has not established specific thresholds for coastal resources, it follows the regulations set forth in 15 CFR 930, Federal Consistency with Approved Coastal Management Programs. A federal action is subject to Coastal Zone Management Act federal consistency requirements if the action will affect a coastal use or resource, in accordance with NOAA's regulations. Under § 930.33, federal agencies shall determine which of their activities affect any coastal use or resource of states with approved management programs. Effects are determined by looking at reasonably foreseeable direct and indirect effects on any coastal use or resource. If the federal agency determines that the activity has no effects on any coastal use or resource, and a negative determination under § 930.35 is not required, then the federal agency is not required to coordinate with state agencies under Section 307 of the Coastal Zone Management Act. The FAA has indicated that a proposed action or its alternatives cannot be approved if a state with an approved CZMP raises an objection unless other specified actions are taken.

This section addresses potential significant coastal resources with regard to consistency with Chapter 205A, HRS, and the Rules and Regulations of the Maui Planning Commission. Hawaii's CZMP was enacted to provide a common focus for State and County actions associated with land and water uses and activities. The State of Hawaii Department of Business, Economic Development and Tourism, Office of Planning, is responsible for concurring with CZM consistency. In a letter dated March 18 2013, the DBEDT Office of Planning noted that the Proposed Action is not on a list of federal actions that trigger a consistency concurrence with the State's Coastal Zone Management Program (see Appendix I).

4.9.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, no development or change in land use would occur; therefore, there would be no effects to coastal resources.

4.9.4 ALTERNATIVE 5

Hawaii's Coastal Zone Management (CZM) Program, is described in Hawaii Revised Statutes Chapter 205A. Chapter 205A provides the basis for protecting, restoring and responsibly developing coastal communities

and resources. The entire state of Hawaii is located within the Hawaii Coastal Zone. The Proposed Action involves the construction of consolidated rental car facilities on existing Airport property. Pursuant to paragraph 3.2 in Appendix A of FAA Order 1050.1E, the various components of the Proposed Action will not change the manner of use or quality of land, water, or other coastal resources, or limit the range of their uses. A discussion of the Proposed Action's consistency with the objectives and policies of the CZM Program is provided below. Based on the information contained in this section, the Proposed Action is consistent with the Hawaii CZM.

Alternative Site 5 is located within the CZMP, as noted in Chapter 3. Alternative Site 5 is also located within the SMA for Maui County. The SMA permitting system is part of the State of Hawaii Coastal Zone Management Program, with the regulatory function administered at the county level. The SMA permit regulates permissible land uses that are already allowed by land use policies including zoning designations, county general plans, and community development plans. County authorities administer Special Management Area permits and shoreline setback provisions. Therefore, at OGG the County of Maui, Department of Planning, administers SMA permits. HDOT-A has begun the SMA permit process with the Maui Department of Planning, which included presenting the Draft EA in support of the SMA permit process to the Maui Planning Commission on April 23, 2013. The Maui Planning Commission provided comments on the Draft EA (see Appendix I) and will consider the response to comments and the Final EA before issuing an SMA permit for the project.

The following section addresses the applicability of the alternative to coastal zone management considerations, as set forth in Chapter 205A, HRS, and the Rules and Regulations of the Maui Planning Commission.

4.9.4.1 Recreational Resources

Objective: Provide coastal recreational opportunities accessible to the public.

Policies:

a. Improve coordination and funding of coastal recreational planning and management; and

b. Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:

   i. Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;

   ii. Requiring replacement of coastal resources having significant recreational value, including but not limited to, surfing sites, fishponds, and sand beaches, when such resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the State for recreation when replacement is not feasible or desirable;

   iii. Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;

iv. Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;

v. Ensuring public recreational use of County, State, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;

vi. Adopting water quality standards and regulating point and non-point sources of pollution to protect and, where feasible, restore the recreational value of coastal waters;

vii. Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and

viii. Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and County authorities; and crediting such dedication against the requirements of Section 46-6.

Development of the proposed ConRAC facility would not impede coastal recreational opportunities. At the Alternative 5 site, the nearest portion of the proposed ConRAC facility to coastal resources would be approximately 2,500 feet inland of the shoreline and outside the shoreline area. As the Proposed Action would be restricted to the development of a three-and-a-half-story parking facility with integrated rental car facilities, it would have no negative impacts on nearby coastal recreational areas, such as the nearby Kanahā Beach Park.

4.9.4.2 Historic Resources

Objective: Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies:

a. Identify and analyze significant archaeological resources;

b. Maximize information retention through preservation of remains and artifacts or salvage operations; and

c. Support State goals for protection, restoration, interpretation, and display of historic resources.

Several archaeological reports have been prepared for the Alternative 5 site, including assessments for the originally planned development of an open-air parking lot extension at the site. Plans have since been altered to accommodate current and future facility requirements at Kahului Airport and, now, the three-and-a-half-story ConRAC facility is proposed for the site. In the event that significant cultural deposits or human skeletal remains are inadvertently encountered, in accordance with Section 6E-43.6, HRS, and Chapter 13-300, HAR, work would stop in the immediate vicinity and the SHPD of the DLNR would be contacted.

4.9.4.3 Scenic and Open Space Resources

Objective: Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

a. Identify valued scenic resources in the coastal zone management area;

b. Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;

c. Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and

d. Encourage those developments that are not coastal-dependent to locate in inland areas.

The Proposed Action would not impact scenic or open space resources. The Alternative 5 site is part of the existing Airport property and represents an enhancement of the originally planned open-air Airport parking expansion. The site is located approximately 2,500 feet inland of the shoreline and would not affect views along the shoreline. The proposed ConRAC facility would be limited to a three-and-a-half-story parking facility with additional facilities for rental car operations and would be located in an area with related commercial and transportation uses. Therefore, the proposed structures are not anticipated to have a substantial visual impact along existing and proposed public Airport facilities and Airport access routes.

4.9.4.4 Coastal Ecosystems

Objective: Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

a. Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;

b. Improve the technical basis for natural resource management;

c. Preserve valuable coastal ecosystems, including reefs, of significant biological or economic importance;

d. Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and

e. Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and non-point-source water pollution control measures.

Alternative 5 is not anticipated to result in adverse impacts to coastal ecosystems. Drainage improvements include the construction and operation of two storm water detention basins to prevent an increase in runoff from Alternative Site 5. Applicable BMPs and erosion-control measures would be implemented to mitigate

runoff during construction-related activities. In addition, provisions that address onsite storage of fuel or other chemicals related to the ConRAC facility operations would be implemented to ensure against degradation of coastal water ecosystems in the event of fuel spillage.

The construction plans and specifications for the proposed ConRAC facility and related improvements would include BMPs to minimize erosion on the project site during and after construction and would also include measures to contain runoff onsite during the construction period. Construction would occur approximately 2,500 feet inland of the shoreline; nevertheless, temporary erosion control measures would be used during construction to prevent runoff into and siltation of nearby coastal waters. These measures, which include considerations related to development of the proposed ConRAC facility within a floodplain, include the construction and operation of two storm water detention basins to provide compensatory floodplain storage, and protection of the Kalialinui Stream channel through the Alternative 5 site. The detention basins would be designed in compliance with FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants on or Near Airports*, to minimize their attractiveness to wildlife.

The project plans would include water pollution and erosion controls related to the specific erosion and sediment control practices for exposed areas and use of materials in the work areas. The contract specifications would also include sections on environmental controls and pollution controls, which set forth the required actions to be implemented during construction to protect adjacent and downstream areas from runoff and discharge of pollutants.

4.9.4.5 Economic Uses

Objective: Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

a. Concentrate coastal dependent development in appropriate areas;

b. Ensure that coastal dependent development, such as harbors and ports, and coastal related development, such as visitor industry facilities and energy generating facilities, are located, designed, and constructed to minimize adverse social, visual, and environmental impacts in the coastal zone management area; and

c. Direct the location and expansion of coastal dependent developments to areas designated and used for such development, permit reasonable long-term growth in such areas, and permit coastal dependent development outside of such designated areas when the:

   i. Use of presently designated locations is not feasible;

   ii. Adverse environmental effects are minimized; and

   iii. Development is important to the State's economy.

The proposed ConRAC facility at Alternative Site 5 would provide upgraded rental car facilities and improve the experience for visitors arriving at Kahului Airport. Further, development of the ConRAC facility at Site 5 would be located on a site that was approved for use as a parking lot. Development of the ConRAC facility at

Alternative Site 5 would be compatible with surrounding land uses and represent an enhancement of the previously approved use. As a facility designed to enhance Airport operations, the ConRAC facility would benefit the State and local economy.

In the short term, the proposed project would provide employment during construction and would benefit the local population.

4.9.4.6 Coastal Hazards

Objective: Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.

Policies:

a. Develop and communicate adequate information about tsunami, storm waves, flooding, erosion, subsidence, and point and non-point-source pollution hazards;

b. Control development in areas subject to tsunami, storm waves, flooding, erosion, hurricanes, wind, subsidence, and point and non-point-source pollution hazards;

c. Ensure that development complies with requirements of the Federal Flood Insurance Program; and

d. Prevent coastal flooding from inland projects.

According to the FIRM for the Airport, the proposed ConRAC facility at Site 5 would be located in Flood Zone AE, an area subject to inundation by the 1-percent-annual-chance flood event, with a base flood elevation of approximately 25 feet above mean sea level. The HDOT-A completed a flood study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport fuel farm project. This flood study determined that the Alternative 5 site is outside of the floodway as shown on Exhibit 3-6. The proposed ConRAC facility would be designed such that it would not alter flooding characteristics or raise flood heights. Additionally, Flood Development Permits would be sought, as appropriate.

The proposed ConRAC facility would be located away from other environmentally sensitive areas and areas prone to other coastal hazards, such as storm waves and coastal erosion. The proposed ConRAC facility would be located inland of the tsunami evacuation area and would not impede with evacuation efforts in the event of a tsunami.

4.9.4.7 Managing Development

Objective: Improve the development review process, communication, and public participation in the management of coastal resources and hazards.

Policies:

a. Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;

b. Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and

c. Communicate the potential short- and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.

Opportunities for review and input regarding the Proposed Action are provided through the EA and SMA permit processes. The proposed development is seen as an enhancement of a planned use defined in the 1997 Kahului Airport Master Plan. The proposed development would be located in proximity to the primary use of the area for an airport as well as other compatible land uses.

Agencies and interested parties were engaged in early consultation during preparation of this Draft EA. Comments received in response to the early consultation letter and responses are included in Appendix A of this Draft EA. The availability of the Draft EA was published in the *Environmental Notice*, a twice-monthly publication from the State of Hawaii, Department of Health, Office of Environmental Quality Control (OEQC), which began a 30-day public comment period. Comments received on the Draft EA are included in **Appendix I**.

4.9.4.8 Public Participation

Objective: Stimulate public awareness, education, and participation in coastal management.

Policies:

a. Promote public involvement in coastal zone management processes;

b. Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and

c. Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

While the alternative site for the Proposed Action is located within the Kahului Airport Master Plan area, which has been subject to extensive public input, the proposed ConRAC facility is subject to processes that facilitate public awareness, education, and participation. The EA and SMA permitting processes provide channels for public awareness, education, and participation and will address the technical characteristics of the specific project, as well as environmental impacts and proposed mitigation measures. The Proposed Action is subject to a public hearing before the Maui Planning Commission in connection with requirements of the SMA process.

4.9.4.9 Beach Protection

Objective: Protect beaches for public use and recreation.

Policies:

a. Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;

b. Prohibit construction of private erosion-protection structures seaward of the shoreline, except when they result in improved aesthetic and engineering solutions to erosion at the sites and do not interfere with existing recreational and waterline activities; and

c. Minimize the construction of public erosion-protection structures seaward of the shoreline.

Alternative Site 5 is situated approximately 2,500 feet inland of the shoreline. As such, adverse effects on beach processes are not anticipated. Appropriate BMPs would be implemented to mitigate storm water runoff associated with the project and to ensure that impacts to downstream and adjoining areas are mitigated.

4.9.4.10 Marine Resources

Objective: Promote the protection, use, and development of marine and coastal resources to ensure their sustainability.

Policies:

a. Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;

b. Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;

c. Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;

d. Promote research, study, and understanding of ocean processes, marine life, and other ocean resources to acquire and inventory information necessary to understand how ocean development activities relate to and affect ocean and coastal resources; and

e. Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.

The proposed project would not increase runoff from the project site. Implementation of appropriate BMPs and the provision of storm water detention basins would mitigate potential impacts to downstream marine and coastal resources.

In addition to the foregoing objective and policies, Section 205A-30.5, HRS, "Prohibitions," provides specifications for the limitation of lighting in coastal shoreline areas in relation to the granting of SMA permits:

a. No special management area use permit or special management area minor permit shall be granted for structures that allow artificial light from floodlights, uplights, or spotlights used for decorative or aesthetic purposes when the light:

    i. Directly illuminates the shoreline and ocean waters; or

    ii. Is directed to travel across property boundaries toward the shoreline and ocean waters.

b. Subsection (a) shall not apply to special management area use permits for structures with:

    Artificial lighting provided by a government agency or its authorized users for government operations, security, public safety, or navigational needs provided that a government agency or its authorized users shall make reasonable efforts to properly position or shield lights to minimize adverse impacts.

The Proposed Action does not affect a coastal use or coastal resources. The proposed ConRAC facility would be located approximately 2,500 feet inland of the shoreline, entirely on Airport-owned property. Airport property is not available for public use and is not considered a coastal resource. Lighting installed in conjunction with the proposed project would not directly illuminate the shoreline or ocean waters nor would it direct light across property boundaries toward the shoreline or ocean waters. All lighting would comply with applicable requirements of the County's Outdoor Lighting Ordinance. Exterior lighting would be downward facing and fully shielded.

4.10 Fish, Wildlife, and Plants

4.10.1 OVERVIEW

In accordance with FAA Orders 1050.1E and 5050.4B, potential effects to biological resources, including fish, wildlife, and plants, and to species protected under the Endangered Species Act of 1973, were evaluated. The Endangered Species Act, as amended (50 CFR 402), requires each federal agency to confer with the U.S. Fish and Wildlife Service, "on any action which is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat."

This section focuses on the potential for the Proposed Action to jeopardize the continued existence of a listed species or to destroy or adversely modify critical habitat.

4.10.2 METHODOLOGY

Impacts to biotic communities and threatened and endangered species were assessed through a botanical and fauna survey of the Alternative 5 site (see Appendix B).

4.10.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, no development or change in land use would occur; therefore, no effects to fish, wildlife, or plants would occur.

4.10.4 ALTERNATIVE 5

The Alternative 5 site is located in an urbanized area that had previously been partially developed and is currently used as a UPS package processing facility, a baseyard, and construction materials storage area. In addition, the Airport is located in an area surrounded by commercial and light industrial development. The closest area that provides an environment supporting established native resident or migratory wildlife corridors suitable for the movement of any native resident or migratory fish or wildlife is the Kanahā Pond Wildlife Sanctuary. The sanctuary is located on Airport property, approximately one-half mile northwest of the Alternative 5 site.

Based on the results of the fauna and botanical survey described in Chapter 3, one federally endangered species was detected on Airport property during surveys conducted in October 2012.[22] The vocalizations of at least one endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) was detected using a bat detector set to the frequency of 27,000 Hertz that these bats are known to use for echolocation.

The endemic and endangered Blackburn's sphinx moth (*Manduca blackburni*) has been known to occur in the immediate vicinity of the Alternative 5 site, but was not observed during the survey. This large moth has developed an alternative host plant relationship with the non-native tree tobacco (*Nicotiana glauca*), which has a role in the moth's survival and recovery. Several tree tobacco plants were seen on the Alternative 5 site. Examinations of these plants failed to find any eggs or larvae of the moth, although such activity is usually confined to the winter and early spring months when moisture is higher and rapid plant growth is occurring. The pupae of these moths, however, may be present in the soil and leaf litter below the tree tobacco plants where they migrate after their larvae mature and enter the pupal stage, and where they would remain until emerging as adults at the onset of the next wet season.

Many migrant shorebirds and waterfowl have been observed in the Kanahā Pond Wildlife Sanctuary and it is assumed that this area is used for nesting. The pond is home to two endangered species: the Hawaiian stilt and the Hawaiian coot.[23]

A Biological Assessment documenting potential effects to both the Hawaiian hoary bat and the Blackburn's sphinx moth was prepared and submitted to the U.S. Fish & Wildlife Service on December 13, 2012 to initiate formal consultation under the Endangered Species Act (see **Appendix H**). The U.S. Fish & Wildlife Service (USFWS) responded to the FAA on January 16, 2013 requesting additional information on the potential direct and indirect impacts to listed species. Specifically, the USFWS requested that additional surveys for the Blackburn's sphinx moth be conducted during the wettest part of the year, that additional details be provided on the design of the proposed storm water detention basins so the USFWS could determine their potential attractiveness to the federally endangered Hawaiian stilt, that the FAA proscribe the removal of trees or shrubs greater than 15 feet in height during the breeding season of the Hawaiian hoary bat, and that

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[22] Robert W. Hobdy, *Botanical and Fauna Surveys, Kahului Airport Corridor & Detention Basins 1 & 5*, October 2012.

[23] Kanahā Pond Wildlife Sanctuary, Overview, Maui Info Source. http://www.mauiinfosource.com/Maui History & Culture/Maui Museums & Historical Landmarks/Central Maui Museums & Historical Landmarks/Kanaha Pond/kanaha_pond_main.htm, accessed August 2012.

measures to minimize the potential for invasive species introduction and transport during construction be considered (see Appendix A).

As requested, a follow-up survey was conducted on February 5, 2013 by HDOT-A one month after the first significant rainfall event of the 2012-2013 wet season. A search of all areas that would be affected by the proposed Airport Access Road Phase II corridor was made to locate all plant species that are known to be the specific hosts for the Blackburn's sphinx moths' during their egg laying and larval stages. These included their favorite host, the tree tobacco (*Nicotiana glauca*) as well as the cherry tomato (*Solanum lycoperiscum*) which had also been found during the 2012 survey. These host species were identified, counted, and mapped. Each individual was examined for the presence of moths, their eggs, and larvae and for signs of larval feeding. The survey did not reveal any Blackburn's sphinx moth activity in any of the areas on a total of approximately 67 potential host plants (see Appendix A).

The FAA provided the additional requested information to the USFWS on February 22, 2013; the USFWS responded on March 27, 2013 concurring with FAA's determination that construction and operation of the proposed ConRAC facility **may affect, but is not likely to adversely affect** the endangered Hawaiian hoary bat, Hawaiian stilt, and Blackburn's sphinx moth, with the implementation of the following conservation measures to avoid and minimize impacts to these listed species (see Appendix A).

1. No barbed wire will be used on any fencing installed as part of the proposed project.
2. Clearing of woody vegetation greater than 15 feet tall will be prohibited from June 1 to September 15 during the Hawaiian hoary bat breeding season.
3. The project's stormwater detention basins shall be designed, constructed, and maintained for a maximum 48-hour detention period after a storm, and will be steep-sided, rip-rap lined, narrow, and linearly shaped to minimize attractiveness to wildlife. If necessary, physical barriers such as bird balls, wire grids, pillows, or netting may also be installed to minimize wildlife attraction.
4. Clearing work for the proposed project will not commence until after the dry season has concluded (typically in mid-November) to allow any pupating Blackburn's sphinx moth in the ground to emerge.
5. Tree tobacco (*Nicotiana glauca*) plants will be cut down and treated with herbicide between October 1 and November 15 (after the hoary bat breeding season, but before the wet season) to preclude future Blackburn's sphinx moth larval foraging at the proposed project site.
6. All construction materials utilized on the project would be subject to invasive species inspection screening procedures already in place on Maui.

Lighting associated with the proposed ConRAC facility and entrance and exit ramps would be shielded away from the coast and the Kanahā Pond Wildlife Sanctuary to reduce potential lighting impacts on the Hawaiian stilt, the Hawaiian coot, and other coastal birds observed near the location of the Proposed Action. Where possible, the HDOT-A would install native, drought tolerant, and non-wildlife attracting landscaping around the proposed ConRAC facility to lend a distinctive accent to the project. A list of appropriate species can be found in the Maui County Planting Plan or can be obtained from nursery growers who specialize in native plants.

4.11 DOT Section 4(f) Lands

4.11.1 OVERVIEW

49 U.S.C. Section 303(c), commonly referred to as Section 4(f) of the DOT Act, states that it is federal policy that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites. Under DOT Section 4(f), the FAA may approve a program or project requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of a historic site of national, State, or local significance, only if: (1) there is no prudent and feasible alternative to using that land; and (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

Whether or not there would be a change in the use of a recreational park or facility funded through the Department of the Interior Land and Water Conservation Fund Act of 1965 was also examined. If a change from a recreational to a nonrecreational use were to occur, it would be considered a "conversion" under the Land and Water Conservation Fund Act. Conversion of parks funded through Land and Water Conservation Fund grants is defined by regulations and guidelines issued by the National Park Service to implement Section 6(f) of the Land and Water Conservation Fund Act. Section 6(f) properties are considered in the same manner as Section 4(f) lands. There are no Section 6(f) properties on or adjacent to Kahului Airport.

Both direct and indirect adverse impacts to Section 4(f) lands were considered. Direct impacts include any physical taking of the property. Indirect adverse impacts, such as noise, which conflict with the public use of Section 4(f) lands or adversely affect the context of historic sites, are considered a constructive use, or taking of the property, if normal activities on the property are incompatible with FAA guidelines on noise and land use.

Parks, recreational areas, wildlife refuges, and historic sites are land uses that may be noise-sensitive depending upon the specific use of the site. Sites that might be substantially affected by excessive noise are amphitheaters, campgrounds, or other areas where a quiet setting is a significant attribute of the resource.

4.11.2 METHODOLOGY

Existing recreational resources near Kahului Airport were documented through a review of applicable plans and maps. According to FAA Order 1050.1E, a significant impact would occur to Section 4(f) or 6(f) lands "when a proposed action involves more than a minimal physical use of a Section 4(f) property or is deemed a 'constructive use' substantially impairing the Section 4(f) property, and mitigation measures do not eliminate or reduce the effects of the use below the threshold of significance." As described in Section 4.1, "Noise," Alternative 5 (the Proposed Action) would not affect off-Airport noise related to aircraft operations, meaning that there would not be indirect noise impacts at parks or other recreational areas located under the Airport flight paths (such as at the Kanahā Pond Wildlife Sanctuary or Kanahā Beach Park). Based on these factors, the analysis was focused on those recreational resources located in the immediate vicinity of the Airport.

Impacts to historic resources, which are also considered Section 4(f) lands, are addressed in Section 4.13, "Historic, Archaeological, Architectural, and Cultural Resources."

4.11.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, there would be no actions at the Airport that would induce growth or otherwise affect the demand for recreational resources. Accordingly, the No Action Alternative would have no effect on recreational or historic resources.

4.11.4 ALTERNATIVE 5

As described in Section 4.1, "Noise," and Section 4.18, "Construction Impacts," Alternative 5 would not generate noticeable changes in noise off Airport property. Accordingly, there would be no noise-related impacts to the recreational facilities near the Airport. Similarly, for the reasons described in Section 4.14, "Light Emissions and Visual Impacts," the Proposed Action would not significantly affect views at the Kanahā Pond State Wildlife Sanctuary, Kanahā Beach Park, or other areas where scenic views contribute substantially to the recreational experience. Therefore, Alternative 5 would not have significant impacts on recreational resources.

Impacts on historic resources, which are also considered DOT Section 4(f) resources, resulting from the Proposed Action, are addressed below in Section 4.13; these impacts would not be significant.

4.12 Historic, Archaeological, Architectural, and Cultural Resources

4.12.1 OVERVIEW

To comply with the National Historic Preservation Act of 1966 and the Archaeological and Historic Preservation Act of 1974, cultural resources that have the potential to be affected by a Proposed Action must be identified.

4.12.2 METHODOLOGY

4.12.2.1 Historic, Archaeological, and Architectural Resources

A historic, archaeological, and architectural survey report for the Alternative 5 site was completed in October 2012 (see Appendix C).[24] The survey report included an archive search of previously identified historic and archaeological resources, and summarized pre- and post-European contact history in the area (see Section 3.8).

[24] Scientific Consultant Services, Inc., *An Archaeological Inventory Survey of Approximately 41-acres for the Consolidated Rental Car Facility and Associated Improvements at Kahului Airport, Kahului, Wailuku Ahupua'a Wailuku District, Island of Maui, Hawaii*, October 2012.

4.12.2.2 Cultural Resources

A cultural impact assessment in compliance with the State of Hawaii Office of Environmental Quality Control "Guidelines for Assessing Cultural Impacts" (§ 11-200-A HAR) was conducted by sending letters of inquiry to Native Hawaiian groups, the Maui County Cultural Resources Commission, and other groups (see **Appendix F**).[25] No responses concerning the proposed project have been received to date, no one provided testimony concerning the proposed project at a meeting of the Maui County Cultural Resources Commission, and the Commission did not identify any additional informants to contact.

4.12.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, current land uses would continue. There would be no adverse impacts to any historic resources and no adverse impacts to archaeological or cultural resources.

4.12.4 ALTERNATIVE 5

One structure was identified during the historic, archaeological, and architectural survey of the Alternative 5 site. A small generator building is located in the north central portion of the site. This structure was probably constructed in the 1940s, when the current Airport area was transformed into Naval Air Station Kahului. The generator building was assessed for significance under Criterion D, but was determined not to be eligible for listing on the NRHP. No other historic resources are known to exist within the Alternative 5 site.

Potential excavation for purposes of installing foundations to support the ConRAC facility would be included as part of Alternative 5 (the Proposed Action). Mechanical subsurface testing of representative locations within the Alternative 5 site was conducted to identify evidence of significant archaeological and/or historic sites or features. However, no subsurface archaeological, paleontological, or geologic resources or human remains were discovered during excavation of the trenches. In the event that cultural or archaeological resources are encountered during construction, all work within the vicinity of the find would stop until a qualified archaeologist can assess the finds and make recommendations. Because it has been determined that there are no historic properties listed or eligible for listing on the NRHP, and no archaeological sites have been identified within the APE, the FAA finds that the Proposed Action would not affect any properties listed or eligible for listing on the National Register of Historic Places under 36 CFR 800.4(d)(1).

The FAA initiated Section 106 consultation with the SHPD by letter dated October 2, 2012 as part of the agency scoping process.[26] In this letter, the FAA determined the APE as part of the concurrent NEPA and Section 106 processes. Also in this letter, in accordance with 36 CFR 800, the FAA determined there were no properties listed or eligible for listing on the NRHP. The FAA also made a finding that the proposed undertaking would not affect any properties listed or eligible for listing on the NRHP. The FAA did not receive an objection from the SHPD to its determinations and findings during the 30 -day period following receipt of

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[25] Scientific Consultant Services, Inc., *A Cultural Impact Assessment for the Consolidated Rental Car Facility and Associated Improvements at Kahului Airport, Kahului, Wailuku Ahupua'a Wailuku District, Island of Maui, Hawaii*, November 2012.

the FAA's letter by the SHPD. Therefore, pursuant to 36 CFR § 800.4(d)(i), the FAA has fulfilled its obligations under Section 106 of the NHPA. Therefore, FAA's responsibilities under Section 106 are complete.

4.13 Light Emissions and Visual Impacts

4.13.1 OVERVIEW

The primary sources of light emissions from airports are the passenger terminal and parking areas, but FAA-required lighting for security, obstruction clearance, and navigation are typically the light emissions most noticeable off-Airport. An analysis of the impacts of light emissions on the surrounding environment is required when proposed projects include the introduction of new lighting that may affect residential or other light-sensitive land uses. As described in FAA Order 1050.1E, Paragraph 12.2a, "the FAA official considers the extent to which any lighting associated with an action will create an annoyance among people in the vicinity or interfere with their normal activities."

Airport improvements involving potential disruption of the natural environment or the aesthetic integrity of the area or any activities that may affect sensitive locations, such as parks, historic sites, or other public use areas, are relevant visually.

4.13.2 NO ACTION ALTERNATIVE

The No Action Alternative would not result in any development or change in land uses; therefore, no change to existing light emission or visual impacts would occur.

4.13.3 ALTERNATIVE 5

4.13.3.1 Light Emissions

The existing rental car ready/return facilities have lighting standards and are illuminated at night for security purposes. In addition, Kahului Airport Road between the existing Enterprise Rent-A-Car facility and Keolani Place features standard roadway lighting consistent with the urban environment. The proposed ConRAC facility would maintain the same lighting standards currently in effect within these areas. The lighting fixtures would comply with the Maui County, Outdoor Lighting ordinance to the extent possible, which may include the use of shielded lighting and lighting that is focused on the ground to avoid impacts to seabirds. The proposed ConRAC facility would result in new lighting sources beyond what currently exists within the area. However, this lighting would be consistent with lighting in an urban environment. Because there are no residences located in the immediate vicinity of Alternative Site 5, light emissions would not create an annoyance among people or interfere with normal activities. Therefore, no impacts in terms of light emissions would be anticipated.

4.13.3.2 Visual Impacts

The Alternative 5 site is located southwest of the existing passenger terminal parking lot and a portion of the site is currently used as an UPS package processing facility, a baseyard, and construction materials storage area. The areas east and northeast of the Alternative 5 site are dedicated to Airport use and include Runway 2-20, the Airport terminal buildings, and the Airport public parking lot. To the south and southwest, the Alternative 5 site is bordered by Haleakala Highway and administrative office buildings, respectively. Beyond these areas and roads lie undeveloped parcels of land and light industrial and commercial use buildings.

The architectural aesthetic of both on- and off-Airport areas around the project site is largely utilitarian in nature, dominated by roadside commercial buildings and light and general industrial manufacturing structures. The buildings are fairly uniform in height and are usually at-grade structures. The major portion of the site is currently undeveloped and unpaved land.

The most distinct visual features within areas surrounding the project site are the coast, the Kanahā Pond Wildlife Sanctuary, and Kahului Town. As none of these features is located on nor immediately adjacent to the Airport, they would not be directly affected by Alternative 5.

The proposed ConRAC facility is currently designed with a maximum height of approximately 76.5 feet above ground level (agl). The existing Kahului Airport terminal buildings which would be adjacent to the ConRAC facility are approximately 35 feet agl. The ASAP and Air Cargo facilities, also adjacent to the proposed ConRAC facility are approximately 20 feet AGL. Additionally, the ConRAC facility is proposing the construction of raised ramps for ingress and egress to the levels of the facility.

Through input and direction from Airport stakeholders, the design team has planned a cultural theme and concept for the proposed ConRAC facility based on the Plantation Style architecture found locally in Wailuku and Lahaina. These cultural guiding principles informed decisions concerning overall building massing along with specific materials and color palette and would directly shape the building's aesthetics.

The essence of the Plantation Style is a formal prominence created by a strong, simple roof form that diminishes in height on either end. The Plantation Style includes a central, prominent roof form as its major feature. The floor plan is massed around a central enclosed space and large perimeter lanai formed by large, deep roof overhangs. The ConRAC massing and proportions have been created following these Plantation Style principles. The facility would feature prominent roof forms topping the south and north edges along with metal trellis screening and masonry walls below. The entire structure would be surrounded by a landscape buffer featuring indigenous planting to soften and shield the building.

Visitors to the facility would be welcomed into a large lanai that surrounds the central customer service area and circulation cores. These pedestrian areas would feature warm-colored, natural materials. Arranged prominently throughout the plaza would be plantings filled with indigenous Hawaiian vegetation that would greet and welcome customers with the fragrances and colors of Maui. A glass and trellis canopy above would protect visitors and form the primary roof of the lanai while allowing visitors to connect with the sun, sky, and natural light.

The materials for the facility would include a mix of colors and texture inspired by the Plantation Style and local natural features, including shell stone. The prominent use of shell stone references the historical use of coral stone on the island within the Plantation Style. In addition to the neutral colored shell stone, the facility would feature a multi-colored slate accent stone that would connect with the varied indigenous colors of Maui and set a baseline palette for the accent colors of the facility.

The roofs, screening, trellis and storefronts would use dark bronze metal inspired by the rust and copper colors seen around the island. The wood accents in the ceiling treatments and handrail components would take inspiration from the historical use of Koa wood.

These forms, materials and landscaping would create a cohesive composition that would incorporate a Hawaiian sense of place into the facility while forming a lasting impression for visitors.

To mitigate the built environment of the proposed ConRAC facility, several mitigation measures are proposed:

- A set back of approximately 170 feet to 750 feet from Keolani Place and 60 feet to 70 feet from the Airport Access Road reduces the visual impact to drivers along those corridors. In addition, the upper level would be tiered and screened with the photovoltaic panels.
- The first level of the ConRAC would be located below the planned elevation of the Airport Access Road.
- The proposed landscaping plan includes the installation of field stock trees and landscaping along the four (4) sides of the ConRAC facility to soften the appearance of the structure.
- Earthen berms would be installed along the north side of the ConRAC to provide a visual relief for the structure.

4.14 Farmlands

4.14.1 OVERVIEW

The U.S. Department of Agriculture defines prime farmland as that land that is best suited for food, feed, forage, fiber, and oilseed crops. Prime farmland produces the highest yields with minimal inputs of energy and economic resources, and farming such land results in the least damage to the environment.

According to the Natural Resources Conservation Service of the U.S. Department of Agriculture, the Farmland Protection Policy Act is "intended to minimize the impact Federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses." For the purpose of impact analysis, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to Farmland Protection Policy Act requirements does not have to be currently used for cropland, but is identified based on soil types that would be irreversibly converted (directly or indirectly) to nonagricultural use. The Natural Resources Conservation Service states that projects completed by a federal agency or with assistance from a federal agency that are subject to the Farmland Protection Policy Act include:

- Airport expansions
- Federal agency projects that convert farmland
- Other projects completed with federal assistance

4.14.2 METHODOLOGY

The State of Hawaii is in the process of identifying, mapping, and designating important agricultural lands on the Island of Maui as required under Act 233. As of June 2012, the only farmland in the vicinity of the Airport designated as important agricultural lands is the Alexander & Baldwin, Inc., sugar cane plantation (27,102 acres).[27] **Exhibit 4-3** depicts the important agricultural lands in the vicinity of the Airport.

4.14.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, no development or change in land use would occur at the Airport; therefore, no impacts to farmlands would occur.

4.14.4 ALTERNATIVE 5

As shown on Exhibit 4-3, the Alternative 5 site is not located on important agricultural lands; therefore, no impacts to farmland would occur.

4.15 Natural Resources and Energy Supply

4.15.1 OVERVIEW

In accordance with FAA Order 1050.1E, the alternatives were examined to identify any resulting measurable effect on local supplies of energy or natural resources.

4.15.2 METHODOLOGY

FAA Order 1050.1E does not establish any significance thresholds for natural resources or energy supply. The Order requires the proposed action to be examined to identify any proposed major changes that would have a measurable effect on local supplies of natural resources or energy. However, the Order states that "[t]he use of natural resources other than for fuel need be examined only if the action involves a need for unusual materials or those in short supply." The Order further states that "[f]or most actions, changes in energy demands or other natural resource consumption will not result in significant impacts."

[27] Hawaii Department of Agriculture, *Important Agricultural Lands Update*. http://hawaii.gov/hdoa/Info/ial/IAL Lands 6-20-12.pdf, accessed September 11, 2012.

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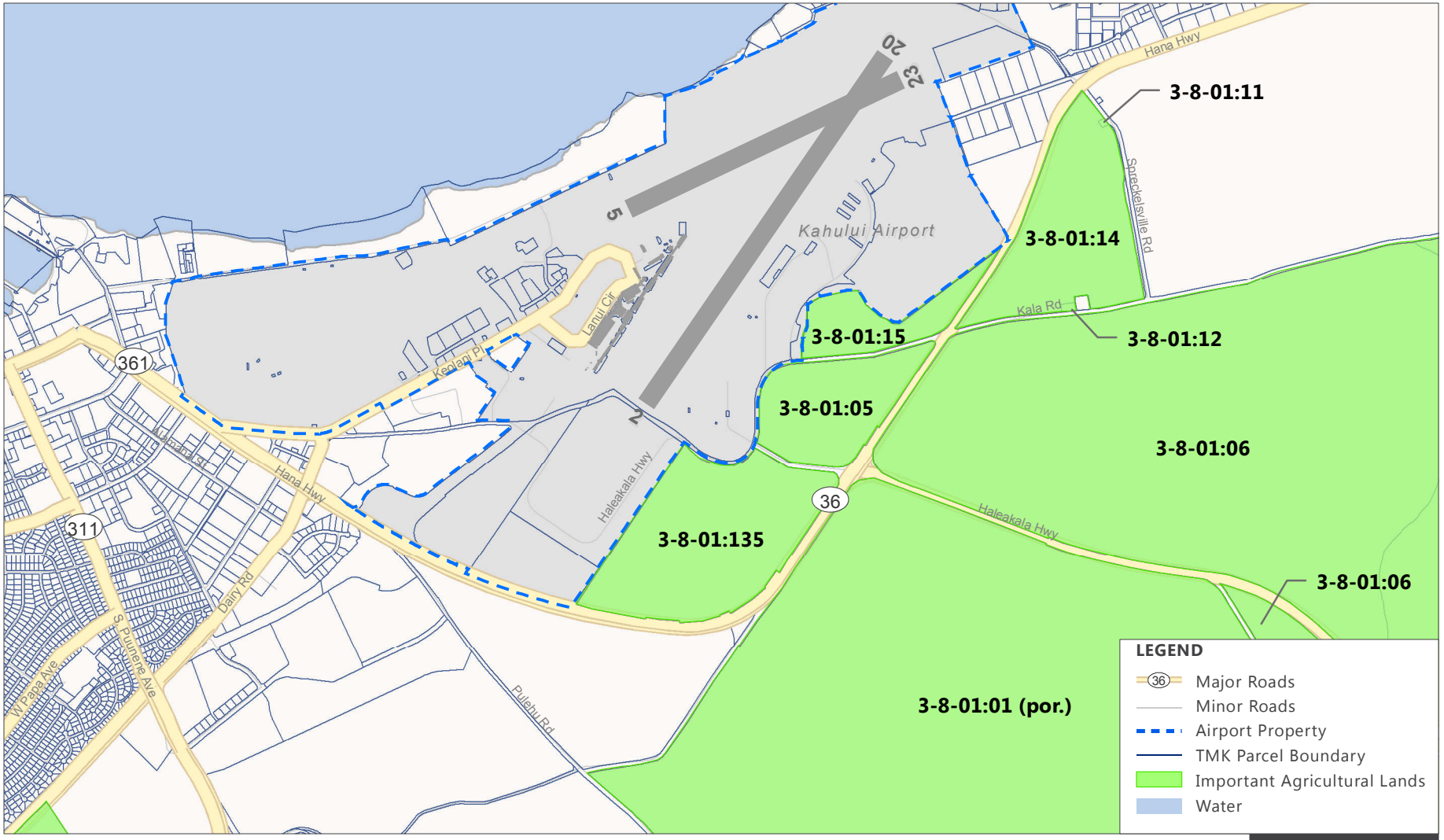

SOURCES: Environmental Systems Research Institute, 2010 (base map); Maui County Geographic Information Systems Division, Department of Management, 2012 (roads, parcels); State Land Use Commission, January 2012 (important agricultural lands); Department of Transportation, Airports Division, June 2011 (property boundary, terminals, runways).
PREPARED BY: Ricondo & Associates, Inc., September 2013.

EXHIBIT 4-3

NORTH 0 2,500 ft.

Important Agricultural Lands in the Vicinity of the Airport

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4.15.3 NO ACTION ALTERNATIVE

The No Action Alternative would not result in any impacts related to natural resources or energy supply.

4.15.4 ALTERNATIVE 5

The Alternative 5 site is currently and has historically been used for aviation and aviation-related purposes. The alternative site, the Airport, or the surrounding areas are not known to contain any significant mineral resources of value to the region or residents of the State. While excavation would potentially occur for the installation of foundations to support the ConRAC facility, the excavation activities would be minor and no loss of any mineral resources would occur. Therefore, no impacts to these resources resulting from the Proposed Action would be anticipated.

The proposed ConRAC facility would not affect natural resources or energy consumption where demand would exceed the capacity of the supplier. In addition, the HDOT-A may install solar panels on the roof of the proposed ConRAC facility, which would be designed to maximize the ability to accommodate solar panels to supplement the electrical supply to the facility and the Airport. Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's LEED Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures.

Alternative 5 would effectively reduce the consumption of natural resources because returning rental car customers would not need to circulate through the terminal roadways and photovoltaic solar panels may be installed to generate power. Alternative 5 would also result in elimination of the rental car shuttle buses, which would further reduce natural resources consumption.

4.16 Hazardous Materials, Pollution Prevention, and Solid Waste

4.16.1 OVERVIEW

Several federal acts regulate the handling of hazardous wastes, substances, and materials. The Resource Conservation and Recovery Act of 1976 (RCRA) is intended to provide "cradle to grave" management of hazardous and solid wastes and regulation of underground storage tanks containing chemical and petroleum products. The RCRA empowers the U.S. EPA to set standards for entities producing, storing, handling, transporting, and disposing of hazardous waste. The RCRA was amended by the Hazardous and Solid Waste Amendments of 1984, which addressed corrective actions and permitting of hazardous waste. Wastes are considered hazardous under the RCRA if they exhibit hazardous characteristics, such as corrosivity, reactivity, or ignitibility, or if they are specifically listed as such by the U.S. EPA. Wastes excluded from regulation as hazardous waste include household wastes, animal wastes, fly ash, slag, and wastes from ore processing.

The Toxic Substances Control Act of 1976 was enacted by the U.S. Congress to provide the U.S. EPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. The U.S. EPA repeatedly screens for these chemicals and can require reporting or testing of those that may pose an

environmental or human-health hazard. In addition, the U.S. EPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. Specifically, the Toxic Substances Control Act includes regulations for polychlorinated biphenyls (PCBs) and defines the use and disposal of products and items containing them.

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund) provides the authority for the federal government to compel people and companies responsible for creating hazardous waste sites to clean them up. CERCLA created a public trust fund to assist with the cleanup of inactive and abandoned hazardous waste sites and accidentally spilled or illegally dumped hazardous materials. Only sites listed on the National Priorities List are eligible for funding from the Superfund. Hazardous substances under CERCLA include those pursuant to the Clean Water Act, Solid Waste Disposal Act, and Toxic Substances Control Act, and substances that present a danger to public health or welfare or to the environment, hazardous wastes, toxic pollutants, and hazardous air pollutants. Hazardous substances under CERCLA do not include petroleum products or natural gas substances or materials.

Hazardous materials are defined under 49 CFR 172 as substances or materials that have been determined to be capable of posing an unreasonable risk to health, safety, and property when transported. Hazardous materials under 49 CFR 172 include hazardous substances, hazardous wastes, marine pollutants, and elevated temperature materials. Management of hazardous materials during transportation is regulated under 49 CFR 171-199.

The Oil Pollution Control Act was signed in August 1990 and provides regulations for the prevention of and response to oil spills. The Oil Spill Liability Trust Fund was created to provide assistance with removal costs and damages for discharges of oil and petroleum products.

4.16.2 NO ACTION ALTERNATIVE

The No Action Alternative would not involve construction or other subsurface activities that could encounter hazardous materials or environmental contamination nor would it have any effect on the types or quantities of hazardous materials currently used at the Airport. Adoption of the No Action Alternative would not generate additional solid waste from construction, demolition, or other operations and, therefore, would not result in any impacts on solid waste at the Airport.

4.16.3 ALTERNATIVE 5

As happens under existing conditions and as would happen under the No Action Alternative, gasoline for storage and use in the proposed ConRAC facility would be transported to the facility by fuel trucks. Current laws regulate the storage and handling of hazardous materials at the Airport and provide for a course of action in the event of an accident or spill. Rental car companies that would operate at the proposed ConRAC facility would be inspected periodically to ensure compliance with all applicable laws and regulations governing the storage and use of fuel. The consolidation of rental car services in one area would centralize fuel storage tanks used for QTA activities. The tanks located where the rental car companies would continue to perform maintenance and staging would remain in place but become secondary. The centralization of the

fuel tanks would reduce the potential for creating a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials.

Implementation of Alternative 5 could result in a risk of exposure to hazards and hazardous materials (fuel spills, etc.) resulting from rental car company maintenance and operations. However, as activities that may lead to these kinds of incidents already take place at the Airport and as Alternative 5 would simply relocate these activities from one area to another, no increase in the potential for fuel spills would occur. Furthermore, all rental car activity would be conducted in conformance with regulatory requirements governing and mitigating the effects of fuel spills and disposal of hazardous materials.

Alternative 5 would not significantly increase or decrease the production of solid waste at the Airport. Any existing solid waste collection facilities would continue to remain following completion of the proposed ConRAC facility. No additional solid waste generation beyond that created under existing conditions is expected to result from the Proposed Action and no impacts would be anticipated.

Alternative 5, once implemented, would result in the same types of activities, but they would occur in different areas of the Airport, and would be consolidated into fewer areas, making monitoring and containment of these activities potentially easier. Construction of the proposed ConRAC facility would result in the generation of construction and demolition debris, which is discussed in Section 4.17 below.

4.17 Construction Impacts

4.17.1 OVERVIEW

Construction impacts result directly and solely from construction activities and are, therefore, limited to the construction period. Additionally, the construction period would be of relatively short duration in comparison to the design life of a facility, and the impacts from such operations can be mitigated using appropriately designed and phased construction techniques. Specific effects of construction activities have the potential to cause air quality and noise impacts, as well as soil and water quality impacts resulting from onsite construction equipment operations and material deliveries.

In accordance with FAA Orders 1050.1E and 5050.4B, the Sponsor must follow local, state, tribal, and federal ordinances and regulations to address the impacts of construction activities, including construction noise, dust and noise from heavy equipment traffic, disposal of construction debris, and air and water pollution. Although construction activities have the potential to create impacts that are temporary in nature, the severity of potential impacts diminish as work progresses and generally disappear after the construction phase. Also, construction impacts alone are rarely significant pursuant to NEPA. Under the No Action Alternative, no construction activities would occur; therefore, there would be no construction-related impacts.

4.17.2 CONSTRUCTION NOISE

Construction of the proposed ConRAC facility at the Alternative 5 site may result in the temporary exposure of Airport employees and patrons to ground-borne vibration and ground-borne noise. Construction of the

proposed ConRAC facility would require some excavation and potentially the use of pile driving equipment in a limited number of locations to set the foundations for the structure. Because of the location of the Alternative 5 site relative to the airfield and local roadways, the noise generated by construction activity would not be significantly greater than the noise generally experienced in the surrounding areas at the site. As the land uses surrounding the Airport are generally industrial and commercial in nature, no noise sensitive land uses are located in the area immediately adjacent to the site. Therefore, any ground-borne vibration or noise impacts resulting from construction activities would be temporary and have no significant impacts.

According to HAR § 11 46 4 for Class C zoning districts including Kahului Airport, if construction noise exceeds a level of 70 dBA for more than 10 percent of the time within any 20 minute period at measurement points beyond the property line, then a Community Noise Permit is required. This 70 dBA threshold is applicable for both daytime and nighttime operations within Class C zoning districts. To mitigate potential noise impacts, contractors are required to use reasonable and standard practices, such as using mufflers on diesel and gasoline engines and using properly tuned and balanced machines. The HDOT-A can also require additional noise mitigation by contractors, such as a requirement to place temporary noise barriers or restrictions on certain kinds of construction activities to certain times of the day. HDOT-A anticipates that use of these mitigation measures combined with the distance from the various construction sites to the Airport property boundary would reduce noise levels below the 70 dBA permit threshold at the OGG property boundary. However, if it is determined by HDOT-A that noise levels from construction activities below the 70 dBA threshold cannot be achieved for some activities, then HDOT-A would apply for and obtain approval for a Community Noise Permit from the Hawaii Department of Health prior to conducting those activities.

4.17.3 AIR QUALITY

Construction of the proposed ConRAC facility would result in short-term increases in emissions due to the operation of various construction vehicles and equipment. An analysis of emissions associated with construction of the proposed ConRAC facility is documented in **Appendix G**. Emissions sources analyzed include nonroad construction equipment (e.g., bulldozers, backhoes, loaders) and on-road construction equipment (e.g., employee vehicle trips, cement mixers, semi-trucks for material hauling). The construction emissions analysis was conducted using standard industry methodologies and techniques, with emissions quantified for construction years 2014 and 2015.

The estimated construction emissions associated with the Proposed Action are presented in **Table 4-1**. Also provided are the significance thresholds set forth in State of Hawaii Administrative Rules (HAR § 11-60.1). As shown, estimated annual emissions of each pollutant are not anticipated to meet or exceed the applicable significance thresholds during any construction year. Therefore, construction-related emissions associated with the proposed ConRAC facility are not anticipated to be significant.

Table 4-1: Estimated Construction Emissions – Proposed Action

	CONSTRUCTION EMISSIONS (TONS/YEAR)					
YEAR	**CO**	**VOC**	**NO_X**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2014	8.112	1.741	19.574	0.077	4.765	0.627
2015	3.419	0.802	8.086	0.036	0.811	0.252
HAR significance threshold 1/	100	40	40	40	15	N/A
NAAQS significance threshold 2/	100	100	100	100	100	100
Exceeds threshold in any year?	**No**	**No**	**No**	**No**	**No**	**No**

NOTES: CO = carbon monoxide; VOC = volatile organic compounds; NOx = oxides of nitrogen; SOx = sulfur oxides; PM10 = particulate matter less than 10 microns; PM2.5 = fine particulate matter; N/A = not applicable.

1/ Hawaii Administrative Rules (HAR § 11-60.1).

2/ 40 CFR 93.153.

SOURCE: Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., November 2012.

4.17.4 WATER QUALITY

Some limited surface grading to prepare for construction of the proposed ConRAC facility would be required at the Alternative 5 site. Piles may be included in the foundation of the proposed ConRAC facility, requiring removal of some soil, which could cause soil erosion. To control fugitive dust and erosion associated with excavation, contractors will be required to comply with the following BMPs to reduce water quality impacts during construction.

- As grading progresses, erosion control and protective devices shall be installed or removed as needed to minimize the risk of sediment discharge from the site. Site perimeters shall be protected with sandbags, silt fence, or other acceptable BMPs. Debris and mud will be contained within the site, and may not be transported from the site via sheet flow, swales, area drains, natural drainage courses, or wind. Active storm drain inlets and outlets will be protected to prevent the potential discharge of pollutants from the site.
- The construction site is to be inspected at 40 percent prediction of rain every 24 hours during extended rain events, and within 24 hours after each storm event to ensure that all BMPs and devices are functional, and to determine maintenance needs. No potential pollutants shall be allowed to be discharged offsite or into drains. A contingency stormwater sampling plan and sample kits shall be onsite or at a nearby location.
- Materials containing potential pollutants shall be protected from contact with stormwater, any accidental spill of a potential pollutant shall be contained and cleaned up promptly to prevent discharge from the site.
- Equipment maintenance activities shall be performed in the designated areas onsite.

- Water trucks shall be used as needed, to minimize fugitive dust.
- Active construction entrance driveways shall be stabilized to minimize dirt or mud being tracked into public streets. Street sweepers, broom sweeping, or approved BMPs shall be used as needed to clean up dirt that enters public streets.
- Stockpiles of dirt or sand shall not be allowed to discharge from the site, via wind or exposure to stormwater.
- Completed slopes over 5 feet high shall be stabilized with any of the following: copolymer, hydroseed material, jute netting, earth guard, or other accepted BMP measures.
- Designated concrete washout stations shall be used onsite for all concrete waste water.

Implementation of these mitigation measures would minimize the potential for soil erosion and loss of topsoil.

4.17.5 SOLID AND HAZARDOUS WASTE

During construction of the Proposed Action, hazardous materials (i.e., fuel, waste oil, solvents, paint, and other hydrocarbon-based products) would be used in quantities that are typical of the construction industry. The construction contract documents would require that these materials be stored, labeled, and disposed of in accordance with State and local regulations. The contractors would also be held responsible for reporting any discharges of hazardous materials or other similar substances (in amounts above their reportable quantities).

State and federal hazardous materials databases were reviewed to determine if the Proposed Action would require the use of land that may contain hazardous substances or may be contaminated.

The U.S. EPA manages RCRAInfo, a national information system that provides access to data supporting RCRA and the Hazardous and Solid Waste Amendments of 1984. RCRAInfo characterizes facility status, regulated activities, and compliance histories and captures detailed data on the generation of hazardous waste from large quantity generators and on waste management practices from treatment, storage, and disposal facilities. The Right to Know Network's Spills and Accidents Database contains RCRAInfo data on toxic chemical spills and other accidents reported to the National Response Center. There were 32 total incidents reported from 1982 through 2012 in Kahului.[28] None of these incidents occurred on Airport property. A review of the Right to Know Network's "Hazardous Waste – Violations and Permits Database" revealed that two violations occurred in Kahului after 1999.[29] One of these incidents occurred on Airport-owned property, but not in the vicinity of the Alternative 5 site (Pacific Helicopters at the Kahului Heliport, Hanger 109; violation type: "Used Oil - Generators"). No known release of petroleum, hazardous substances, pollutants, or contaminants has occurred at the Alternative 5 site.

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[28] The Right-To-Know Network, Spills and Accidents (ERNS) Database, "ERNS Search Results (1982-2012)," (results for Kahului, Hawaii), updated January 16, 2013, www.rtknet.org/db/erns (accessed May 29, 2013).

[29] The Right-To-Know Network, Hazardous Waste - Violations and Permits (RCRIS) Database, "RCRIS Search Results" (results for Kahului, Hawaii), compiled from data last released on May 15, 2013, www.rtknet.org/db/rcris (accessed May 29, 2013).

The Hawaii Department of Health, Environmental Health Administration's Hazard Evaluation and Emergency Response (HEER) Office maintains a listing of facilities, sites or areas in which they have an interest, have investigated, or may investigate under HRS 128D.[30] The HEER Office has listed that PCBs were found in the soil at the Maui Electric Company pad-mount transformer (No. 3357) located northwest of the Alternative 5 site at Hertz Rental Car (850 Mokuea Place, Kahului). The site was remediated and a No Further Action letter was issued. No concerns exist at the Alternative 5 site per the HEER Office's "Sites of Interest Lookup Spreadsheet" (updated January 17, 2013).

The HEER Office also releases a spreadsheet that lists all releases reported historically and managed by the Emergency Preparedness and Response section (updated January 21, 2012).[31] Oil, jet fuel, and hydraulic spills; transformer oil spills; PCBs; and other releases have occurred on Airport property per the HEER Office's release list. A State On-Scene Coordinator has issued a No Further Action letter for the majority of these releases. No releases are known to have occurred on the Alternative 5 site. A review of the HEER Office's Public Record report of State Response and Superfund Program Sites did not list any site with ongoing environmental concerns within the Alternative 5 site.[32]

The Proposed Action site was not formerly used for sugarcane production. Contractors would be required to stop work in the event that previously unknown contaminants are discovered during construction, or a spill occurs during construction, until the National Response Center is notified. Construction and demolition activities would result in a temporary increase in solid waste generation at the Airport. However, recycling, salvage, reuse, and disposal options would be identified in a Solid Waste Management Plan in advance of all activities to minimize the amount of debris directed to local landfills. This plan would include the identification of locations for sorting materials for reuse and recycling. Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's LEED Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which will include reuse and recycling of materials.

4.18 Cumulative Impacts

Cumulative impacts to environmental resources result from the incremental effects of proposed actions when combined with other past, present, and reasonably foreseeable future actions in the area. Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (federal, state, and local) or individuals. In accordance with NEPA, a discussion of cumulative

30 State of Hawaii Department of Health, Hazard Evaluation and Emergency Response Office, "Public Records," http://eha-web.doh.hawaii.gov/eha-cma/Leaders/HEER/public-records (accessed May 30, 2013).

31 State of Hawaii Department of Health, Hazard Evaluation and Emergency Response Office, "Public Records," http://eha-web.doh.hawaii.gov/eha-cma/Leaders/HEER/public-records (accessed May 30, 2013).

32 State of Hawaii Department of Health, Hazard Evaluation and Emergency Response Office, "Hawaii State Response Program Public Record Report for 2012" (October 01, 2011 through September 30, 2012), January 16, 2012.

impacts resulting from projects that are proposed, under construction, recently completed, or planned for implementation in the near future is required.

Projects implemented within the last 5 years or proposed to be implemented within the next 5 years and located within 1-mile of the alternative site were identified in Table 3-8 in Chapter 3.

Table 4-2 summarizes the potential cumulative impacts from the past, present, and reasonably foreseeable actions in conjunction with the Proposed Action. Anticipated impacts from Phases I and II of the Kahului Airport Access Road that would have a potential bearing on the Proposed Action during construction include:

- Temporary increases in emissions,
- Temporary increases in noise from construction equipment activity,
- Temporary increases in construction and demolition debris, and
- Potential impacts to local surface transportation patterns resulting from increases in traffic on local roadways during construction and operation of the projects listed in Table 3-8.

Impacts associated with the Proposed Action would be related to construction activities and minor changes in surface traffic patterns compared with the No Action Alternative. The Proposed Action is not anticipated to increase the type or amount of activity at the Airport, except for temporary increases in construction traffic and minor changes in surface transportation patterns. Therefore, Alternative 5 (the Proposed Action), when considered with the projects identified in Table 3-8 as being within the general vicinity of the Study Area, would not create significant cumulative impacts.

4.19 Other Considerations

The Alternative 5 site is not likely to be environmentally controversial. The Proposed Action is consistent with the plans, goals, and policies of the HDOT-A and development of the Proposed Action would be undertaken in coordination with the Sponsor. In addition, the Proposed Action is not likely to directly, indirectly, or cumulatively create a significant impact on the human environment.

Table 4-2 (1 of 4): Cumulative Impacts Summary

RESOURCE	PAST ACTIONS	PRESENT ACTIONS	PROPOSED ACTIONS	FUTURE ACTIONS	CUMULATIVE IMPACT
Noise	Development that has occurred within the last 5 years around the Airport has contributed to increased surface traffic.	Ongoing development results in construction noise and will increase surface vehicle traffic around the Airport.	Noise related to construction.	Construction noise and increased surface traffic on new and widened roadways.	Temporary construction noise and increased or new roadway noise, primarily in commercial/industrial areas.
Land Use	Some undeveloped land on the Airport has been converted to Airport and commercial uses.	Conversion of former agricultural land to commercial/industrial uses.	Would convert mostly undeveloped land to a ConRAC facility.	New roadways would increase accessibility to some undeveloped land, which could lead to new development.	Conversion of undeveloped land for Airport uses, commercial/industrial uses, and roads.
Socioeconomic Impacts, Environmental Justice, & Children's Health	Increased surface vehicle traffic in areas surrounding the Airport and on-Airport.	Ongoing development will increase surface vehicle traffic around the Airport.	Would decrease surface vehicle traffic on Airport roadways.	Increased surface traffic on new and widened roadways.	Less congestion and traffic on Airport terminal roads; increased surface traffic on new and widened roads.
Air Quality	Increased surface vehicle traffic in areas surrounding the Airport and on-Airport, likely resulting in an increase in on-Airport surface transportation emissions.	Ongoing development results in temporary emissions related to construction equipment and will increase surface vehicle traffic around the Airport, likely resulting in an increase in on-Airport surface transportation emissions.	Temporary construction emissions would be generated. Would reduce certain on-Airport vehicular trips and alleviate traffic congestion, thereby reducing on-Airport surface transportation emissions.	Temporary construction emissions and increased surface vehicle traffic around the Airport, likely resulting in an increase in on-Airport surface transportation emissions.	Temporary construction emissions; some reductions in on-Airport surface traffic and vehicle emissions. Potential increase in off-Airport surface vehicle emissions due to new and widened roads.

Table 4-2 (2 of 4): Cumulative Impacts Summary

RESOURCE	PAST ACTIONS	PRESENT ACTIONS	PROPOSED ACTIONS	FUTURE ACTIONS	CUMULATIVE IMPACT
Water Quality	Conversion of undeveloped land increased the amount of impervious surfaces which may increase runoff.	Conversion of undeveloped land is increasing the amount of impervious surfaces which may increase runoff.	Conversion of undeveloped land would increase the amount of impervious surfaces which may increase runoff.	New and widened roadways would increase impervious surfaces; new development could also result in increased impervious surfaces which may increase runoff.	Increased impervious surfaces will increase storm water runoff. Will be mitigated through implementation of best management practices and applicable NPDES permits.
Wetlands	Storm water runoff from developed areas may affect wetlands.	Storm water runoff from developed areas may affect wetlands.	Storm water runoff from developed areas may affect wetlands.	Improved access to undeveloped areas could increase pressure to develop existing wetlands or affect their hydrology.	Additional development may indirectly affect wetlands through storm water runoff and changes to hydrology. Will be mitigated through implementation of best management practices and applicable NPDES permits.
Floodplains	Increased impervious surfaces from developed areas may increase runoff.	Increased impervious surfaces from developed areas may increase runoff.	Would result in conversion of 100-year floodplain.	Increased impervious surfaces may increase runoff and flooding.	Increased impervious surfaces will increase storm water runoff. Will be mitigated through implementation of best management practices and applicable NPDES permits.
Coastal Resources	Conversion of undeveloped land increased the amount of impervious surfaces which may increase runoff to coastal resources.	Conversion of undeveloped land is increasing the amount of impervious surfaces which may increase runoff to coastal resources.	Conversion of undeveloped land would increase the amount of impervious surfaces which may increase runoff to coastal resources.	Conversion of undeveloped land would increase the amount of impervious surfaces which may increase runoff to coastal resources.	Increased impervious surfaces will increase storm water runoff. Will be mitigated through implementation of best management practices, applicable NPDES and SMA permits.

Table 4-2 (3 of 4): Cumulative Impacts Summary

RESOURCE	PAST ACTIONS	PRESENT ACTIONS	PROPOSED ACTIONS	FUTURE ACTIONS	CUMULATIVE IMPACT
Fish, Wildlife, and Plants	Conversion of undeveloped land to buildings and paved areas resulting in potential loss of habitat.	Conversion of undeveloped land to buildings and paved areas resulting in potential loss of habitat.	Conversion of undeveloped land to buildings and paved areas resulting in potential loss of habitat.	Conversion of undeveloped land to buildings and paved areas resulting in potential loss of habitat.	Loss of some habitat; may affect alternative host species for the Blackburn's sphinx moth.
DOT Section 4(f) Lands	Increased surface vehicle traffic in areas surrounding the Airport and on-Airport, as well as increased storm water runoff.	Increased surface vehicle traffic in areas surrounding the Airport and on-Airport, as well as increased storm water runoff.	Conversion of undeveloped land would increase the amount of impervious surfaces and storm water runoff.	Conversion of undeveloped land would increase the amount of impervious surfaces and storm water runoff.	Increased impervious surfaces will increase storm water runoff. Will be mitigated through implementation of best management practices and applicable NPDES permits.
Historic, Archaeological, Architectural, and Cultural Resources	Conversion of undeveloped land to buildings and paved areas.	Conversion of undeveloped land to buildings and paved areas.	Conversion of undeveloped land to buildings and paved areas.	Conversion of undeveloped land for new and widened roadways.	Conversion of undeveloped land could affect unknown archaeological and cultural resources.
Light Emissions and Visual Impacts	Conversion of undeveloped land to buildings and paved areas.	Conversion of undeveloped land to buildings and paved areas.	Conversion of undeveloped land to buildings and paved areas.	Conversion of undeveloped land for new and widened roadways.	New developments will add light sources to the area, which will need to be mitigated through directional and shielded lighting.
Farmlands	Conversion of agricultural and undeveloped land to commercial/industrial and Airport uses.	Conversion of former agricultural and undeveloped land to commercial/industrial and Airport uses. Development of former agricultural areas into commercial/industrial and Airport district.	May result in the conversion of former agricultural lands to buildings and paved areas, minimal to no impact to current farmlands.	Conversion of undeveloped land for new and widened roadways. Improved access to undeveloped areas could increase pressure to develop former and existing farmlands.	Conversion of some former agricultural land to commercial/industrial and Airport uses. On-Airport and off-Airport areas have transitioned from agricultural to undeveloped to commercial/industrial and Airport uses. Improved access to undeveloped areas could increase pressure to develop existing farmlands.

Table 4-2 (4 of 4): Cumulative Impacts Summary

RESOURCE	PAST ACTIONS	PRESENT ACTIONS	PROPOSED ACTIONS	FUTURE ACTIONS	CUMULATIVE IMPACT
Natural Resources and Energy Supply	Construction and operation of facilities has resulted in an increase of material consumption and energy consumption.	Construction and operation of facilities has resulted in an increase of material consumption and energy consumption.	Construction and operation of proposed facilities would increase material consumption and energy consumption.	Construction and operation of new facilities would increase material consumption and energy consumption	Construction and operation of new facilities would increase materials and energy consumption. Implementation of reuse and recycling programs, as well as energy efficiency measures can reduce this impact.
Hazardous Materials, Pollution Prevention, and Solid Waste	Construction and operation of new facilities has involved the use of hazardous materials, primarily through use of motor fuels, adhesives, etc.	Construction of new facilities involves the use of hazardous materials, primarily through use of motor fuels, adhesives, etc.	Construction would involve the use of hazardous materials, primarily through use of motor fuels, adhesives, etc. Operation of the proposed ConRAC facility would include new fuel tanks, fueling operations, and maintenance activities. These activities already occur at the existing rental car facilities.	Construction would involve the use of hazardous materials, primarily through use of motor fuels, adhesives, etc.	Construction would involve use of hazardous materials, primarily through use of motor fuels, adhesives, etc. Operation of the proposed ConRAC facility would include new fuel tanks, fueling operations, and maintenance activities. These activities already occur at the existing rental car facilities. Implementation of best management practices and adherence to federal, State, and local regulations will mitigate this risk.

SOURCE: Ricondo & Associates, Inc.,, December 2012.
PREPARED BY: Ricondo & Associates, Inc., December 2012.

4.20 Summary of Unavoidable Environmental Impacts and Mitigation

4.20.1 SOCIOECONOMIC IMPACTS

Implementation of Alternative 5 (the Proposed Action) would require relocation of the existing temporary UPS facility. Relocation of this facility was originally approved as part of the proposed surface parking lot expansion depicted on the ALP and approved in the 1997 EIS for Airport improvements. UPS has obtained approval of design plans from HDOT-A and the required SMA permit from the Maui Planning Commission for relocation of the UPS facility on Airport property.

4.20.2 WETLANDS MITIGATION

Should Alternative 5 be implemented, construction activities will need to ensure the protection of the culvert in which Kalialinui Stream is located, to prevent impacts to this Waters of the U.S. In addition, BMPs would need to be implemented to prevent polluted runoff or inadvertent spills from reaching the stream during operation of the proposed ConRAC facility.

4.20.3 FLOODPLAINS

Alternative 5 would impact the floodplain associated with the Kalialinui Stream. However, Kalialinui Stream is located beneath the Alternative 5 site in a culvert, which would need to be protected during construction (if Alternative 5 is implemented) to prevent impacts to stream flow. In addition, two storm water detention basins would be constructed to provide compensatory floodplain storage.

4.20.4 COASTAL RESOURCES

Alternative 5 is located within the SMA. The project's relationship to applicable coastal zone management considerations, as set forth in Chapter 205A, HRS, and the Rules and Regulations of the Maui Planning Commission, is outlined in Section 4.9. This includes mitigation measures for:

- Coastal ecosystems: The drainage improvements would prevent an increase in runoff from the site. Applicable BMPs and erosion-control measures would be implemented to mitigate runoff during construction-related activities. In addition, provisions that address on-site storage of fuel or other chemicals related to the rental car facility operations would be implemented to ensure against degradation of coastal water ecosystems in the event of fuel spillage.
- Coastal hazards: According to the FIRM for the Airport the proposed ConRAC facility would be located in a Flood Zone AE, an area subject to inundation by the 1-percent-annual-chance flood event, with a base flood elevation (BFE) of approximately 25 feet above sea level. Additionally, the ConRAC lies within a designated floodplain. The proposed ConRAC facility would be designed in a way that it would not alter flooding characteristics or raise flood heights. Additionally, Flood Development Permits will be sought, as appropriate. The proposed ConRAC facility would be located away from other environmentally sensitive areas and areas prone to other coastal hazards such as

storm waves and coastal erosion. The proposed ConRAC facility would be located inland of the tsunami evacuation area and would not impede with evacuation efforts in the event of a tsunami event.

4.20.5 LIGHT EMISSIONS

To mitigate the built environment of the proposed ConRAC facility, several mitigation measures are proposed:

- A set back of approximately 170 feet to 750 feet from Keolani Place and 60 feet to 70 feet from the Airport Access Road reduces the visual impact to drivers along those corridors. In addition, the upper level would be tiered and screened with the photovoltaic panels.
- The first level of the ConRAC would be located below the planned elevation of the Airport Access Road.
- The proposed landscaping plan includes the installation of field stock trees and landscaping along the four (4) sides of the ConRAC facility to soften the appearance of the structure.
- Earthen berms would be installed along the north side of the ConRAC to provide a visual relief for the structure.

4.20.6 CONSTRUCTION IMPACTS

Construction impacts result directly and solely from construction activities and are therefore limited to the construction period. Additionally, the construction period is of relatively short duration in comparison to the design life of a facility, and the impacts from such operations can be mitigated utilizing appropriately designed and phased construction techniques. Specific effects of construction activities have the potential to cause air and noise impacts as well as soil and water quality impacts due to on-site construction equipment operations and material deliveries.

5. HRS 343 Additional Requirements

This chapter contains additional sections required to comply with HRS 343. The relationship of the Proposed Action to existing plans, policies, and controls is described, a significance criteria assessment of the Proposed Action is discussed, and a list of permits and approvals required for implementation of the Proposed Action is provided.

5.1 Relationships to Plans, Policies, and Controls

5.1.1 HAWAII STATE PLAN

Chapter 226, HRS, also known as the Hawaii State Plan, is a long-range comprehensive planning instrument which serves as a guide for future development within the State by identifying goals, objectives, policies, and priorities as well as mechanisms for their implementation. The proposed ConRAC facility at Kahului Airport is in accord with the following goals of the Hawaii State Plan:

- A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawaii's present and future generations.
- A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.

5.1.1.1 Objectives and Policies of the Hawaii State Plan

The proposed ConRAC facility is in conformance with the following objectives and policies of the Hawaii State Plan:

Section 226-8 Objective and Policies for the Economy -- Visitor Industry

Objective:

(a) Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawaii's economy.

Policies:

(b)(4) Encourage cooperation and coordination between the government and private sectors in developing and maintaining well-designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.

* * *

(b)(5) Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawaii's people.

Section 226-11 Objectives and Policies for the Physical Environment – Land Based, Shoreline, and Marine Resources

Objective:

(a) (1) Prudent use of Hawaii's land-based, shoreline, and marine resources.

Policies:

(b)(3) Take into account the physical attributes of areas when planning and designing activities and facilities.

* * *

(b)(4) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.

* * *

(b)(8) Pursue compatible relationships among activities, facilities, and natural resources.

Section 226-14 Objective and Policies for Facility Systems – In General

Objective:

(a) Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.

Policy:

(b)(2) Encourage flexibility in the design and development of facility systems to promote prudent use of resources and accommodate changing public demands and priorities.

Section 226-14 Objective and Policies for Facility Systems – Transportation

Policy:

(b)(2) Coordinate state, county, federal, and private transportation activities and programs toward the achievement of statewide objectives.

(b)(5) Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawaii's natural environment

5.1.1.2 Priority Guidelines of the Hawaii State Plan

The proposed action is in keeping with the following priority guidelines of the Hawaii State Plan:

Section 226-103 Economic Priority Guidelines

(b)(1) Promote visitor satisfaction by fostering an environment which enhances the Aloha Spirit and minimizes inconveniences to Hawaii's residents and visitors.

Section 226-104 Population Growth and Land Resources Priority Guidelines

(a)(1) Encourage planning and resource management to insure that population growth rates throughout the State are consistent with available and planned resource capacities and reflect the needs and desires of Hawaii's people.

* * *

(a)(4) Encourage major state and federal investments and services to promote economic development and private investment to the neighbor islands, as appropriate.

* * *

(b)(1) Encourage urban growth primarily to existing urban areas where adequate public facilities are already available or can be provided with reasonable public expenditures, and away from areas where other important benefits are present, such as protection of important agricultural land or preservation of lifestyles.

* * *

(b)(5) In order to preserve green belts, give priority to state capital-improvement funds which encourage location of urban development within existing urban areas except where compelling public interest dictates development of a noncontiguous new urban core.

5.1.2 MAUI COUNTY GENERAL PLAN

As indicated by the Maui County Charter, the purpose of the Maui County General Plan shall be to:

> *... indicate desired population and physical development patterns for each island and region within the county; shall address the unique problems and needs of each island and region; shall explain opportunities and the social, economic, and environmental consequences related to potential developments; and shall set forth the desired sequence, patterns and characteristics of future developments. The general plan shall identify objectives to be achieved, and priorities, policies, and implementing actions to be pursued with respect to population density; land use maps, land use regulations, transportation systems, public and community facility locations, water and sewage systems, visitor destinations, urban design, and other matters related to development.*

Chapter 2.80B of the Maui County Code, relating to the General Plan and Community Plans, implements the foregoing Charter provision through enabling legislation which calls for a Countywide Policy Plan and a Maui Island Plan. The Countywide Policy Plan was adopted as Ordinance No. 3732 on March 24, 2010.

With regard to the Countywide Policy Plan, Section 2.80B.030 of the Maui County Code states the following:

The countywide policy plan shall provide broad policies and objectives which portray the desired direction of the County's future. The countywide policy plan shall include:

1. *A vision for the County;*
2. *A statement of core themes or principles for the County; and*
3. *A list of countywide objectives and policies for population, land use, the environment, the economy, and housing.*

Core principles set forth in the Countywide Policy Plan are listed as follows:

1. *Excellence in the stewardship of the natural environment and cultural resources;*
2. *Compassion for and understanding of others;*
3. *Respect for diversity;*
4. *Engagement and empowerment of Maui County residents;*
5. *Honor for all cultural traditions and histories;*
6. *Consideration of the contributions of past generations as well as the needs of future generations;*
7. *Commitment to self-sufficiency;*
8. *Wisdom and balance in decision making;*
9. *Thoughtful, island appropriate innovation; and*
10. *Nurturance of the health and well-being of our families and our communities.*

Congruent with these core principles, the Countywide Policy Plan identifies goals, objectives, policies, and implementing actions for pertinent functional planning categories, which are identified as follows:

1. *Natural environment*
2. *Local cultures and traditions*
3. *Education*
4. *Social and healthcare services*
5. *Housing opportunities for residents*
6. *Local economy*
7. *Parks and public facilities*
8. *Transportation options*
9. *Physical infrastructure*
10. *Sustainable land use and growth management*
11. *Good governance*

With respect to the proposed Kahului Airport ConRAC Facility and related improvements, the following goals, objectives, policies, and implementing actions are illustrative of the project's compliance with the Countywide Policy Plan.

5.1.2.1 Strengthen the Local Economy

Goal: Maui County's economy will be diverse, sustainable, and supportive of community values.

Objective: Support a visitor industry that respects the resident culture and the environment.

Policies:

- Support the renovation and enhancement of existing visitor facilities.
- Improve collaboration between the visitor industry and the other sectors of Maui County's economy.
- Support the programs and initiatives outlined in the Maui County Tourism Strategic Plan 2006-2015.

5.1.2.2 Diversify Transportation Options

Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.

Objective: Improve and expand the planning and management of transportation systems.

Policies:

- Encourage progressive community design and development that will reduce transportation trips.
- Support designing all transportation facilities, including airport, harbor, and mass-transit stations, to reflect Hawaiian architecture.

5.1.2.3 Improve Physical Infrastructure

Goal: Maui County's physical infrastructure will be maintained in optimum condition and will provide for and effectively serve the needs of the County through clean and sustainable technologies.

Objective: Direct growth in a way that makes efficient use of existing infrastructure and to areas where there is available infrastructure capacity.

Policies:

- Utilize appropriate infrastructure technologies in the appropriate locations.
- Promote land use patterns that can be provided with infrastructure and public facilities in a cost-effective manner.

Objective: Improve the planning and management of infrastructure systems.

Policy: Maintain inventories of infrastructure capacity, and project future infrastructure needs.

5.1.2.4 Promote Sustainable Land Use and Growth Management

Goal: Community character, lifestyles, economies, and natural assets will be preserved by managing growth and using land in a sustainable manner.

Objective: Improve land use management and implement a directed-growth strategy.

Policy: Encourage redevelopment and infill in existing communities on lands intended for urban use to protect productive farm land and open-space resources.

Objective: Improve and increase efficiency in land use planning and management.

Policies:

- Assess the cumulative impact of developments on natural ecosystems, natural resources, wildlife habitat, and surrounding uses.
- Ensure that new development projects requiring discretionary permits demonstrate a community need, show consistency with the General Plan, and provide an analysis of impacts.

- Coordinate with Federal, State, and County officials in order to ensure that land use decisions are consistent with County plans and the vision local populations have for their communities.

In summary, the proposed ConRAC facility will be an integral part of the Kahului Airport Master Plan, improving rental car operations, increasing efficiency of Airport operations, grouping similar land uses, and improving the first impressions and overall experience of visitors to Maui. The planning process engages the public and addresses the needs of the island and the surrounding community. In this regard, the proposed ConRAC facility is consistent with the themes and principles of the Countywide Policy Plan.

5.1.3 WAILUKU-KAHULUI COMMUNITY PLAN

Alternative Site 5 is located in the Wailuku-Kahului Community Plan region which is one of nine Community Plan regions established in the County of Maui. Planning for each region is guided by the respective Community Plans, which are designed to implement the Maui County General Plan. Each Community Plan contains recommendations and standards which guide the sequencing, patterns, and characteristics of future development in the region.

Land use guidelines are set forth by the existing Wailuku-Kahului Community Plan Land Use Map. The project site is designed for "Airport" use by the Community Plan (see Exhibit 3-4).

5.1.3.1 Land Use

Goal: An attractive, well-planned community with a mixture of compatible land uses in appropriate areas to accommodate the future needs of residents and visitors in a manner that provides for the social and economic well-being of residents and the preservation and enhancement of the region's environmental resources and traditional towns and villages.

Objective and Policy:

Maintain the existing Kahului Airport district boundaries, as defined in the Community Plan Land Use Map and continue to evaluate the air transportation needs of the County to determine future air transportation facility requirements. Create a direct control overlay district in and around Kahului Airport due to the public investment and the economic importance of the facility. The boundaries of this district shall be generally defined by the 60 Ldn isoline (60 decibels, day-night average) of the FAA approved noise contour map for the airport. The intent of this district shall be to establish specific guidelines for development within the area which would define uses compatible with the airport and appropriate design standards, particularly with respect to noise attenuation to reduce interior noise levels to the 45 Ldn level or less. Total closure of structures, as well as air-conditioning, are generally required for this purpose. Residential uses should be discouraged within the 60 Ldn isoline.

5.1.3.2 Infrastructure

Goal: Timely and environmentally sound planning, development and maintenance of infrastructure systems which serve to protect and preserve the safety and health of the region's residents, commuters, and visitors through the provision of clean water, effective waste disposal and drainage systems, and efficient transportation systems which meet the needs of the community.

5.1.3.3 Transportation

Objective and Policy: Support the extension of the Kahului Airport runway, access road improvements, and other related facility improvements, including expansion of the adjacent shoreline area for public park uses.

5.1.4 COASTAL ZONE MANAGEMENT ACT

This section addresses potential significant coastal resources with regard to consistency with Chapter 205A, HRS, and the Rules and Regulations of the Maui Planning Commission. Hawaii's CZMP was enacted to provide a common focus for State and County actions associated with land and water uses and activities.

5.1.4.1 Alternative 5

Alternative Site 5 is located within the CZMP, as noted in Chapter 3, and within the SMA for Maui County. This section addresses the alternatives' applicability to coastal zone management considerations, as set forth in Chapter 205A, HRS, and the Rules and Regulations of the Maui Planning Commission.

5.1.4.2 Recreational Resources

Objective: Provide coastal recreational opportunities accessible to the public.

Policies:

a. Improve coordination and funding of coastal recreational planning and management; and

b. Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:

   i. Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;

   ii. Requiring replacement of coastal resources having significant recreational value, including but not limited to, surfing sites, fishponds, and sand beaches, when such resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the State for recreation when replacement is not feasible or desirable;

   iii. Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;

   iv. Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;

v. Ensuring public recreational use of County, State, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;

vi. Adopting water quality standards and regulating point and non-point sources of pollution to protect and, where feasible, restore the recreational value of coastal waters;

vii. Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and

viii. Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and County authorities; and crediting such dedication against the requirements of Section 46-6.

Development of the proposed ConRAC facility would not impede coastal recreational opportunities. The Alternative 5 site would be approximately 2,500 feet inland of the shoreline and outside the shoreline area. As the Proposed Action would be restricted to the development of a three-and-a-half-story parking facility with integrated rental car facilities, it would have no negative impacts on nearby coastal recreational areas, such as the nearby Kanahā Beach Park.

5.1.4.3 Historic Resources

Objective: Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies:

a. Identify and analyze significant archaeological resources;

b. Maximize information retention through preservation of remains and artifacts or salvage operations; and

c. Support State goals for protection, restoration, interpretation, and display of historic resources.

Several archaeological reports have been prepared for the Alternative 5 site, including assessments for the originally planned development of an open-air parking lot extension at the site. Plans have since been altered to accommodate current and future facility requirements at Kahului Airport and, now, the three-and-a-half-story ConRAC facility is proposed for the site. In the event that significant cultural deposits or human skeletal remains are inadvertently encountered, in accordance with Section 6E-43.6, HRS, and Chapter 13-300, HAR, work would stop in the immediate vicinity and the State Historic Preservation Division (SHPD) of the DLNR would be contacted.

5.1.4.4 Scenic and Open Space Resources

Objective: Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

a. Identify valued scenic resources in the coastal zone management area;

b. Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;

c. Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and

d. Encourage those developments that are not coastal-dependent to locate in inland areas.

The Proposed Action would not impact scenic or open space resources. The Alternative 5 site is part of the existing Airport property and represents an enhancement of the originally planned open-air Airport parking expansion. The site is located approximately 2,500 feet inland of the shoreline and would not affect views along the shoreline. The proposed ConRAC facility would be limited to a three-and-a-half-story parking facility with additional facilities for rental car operations and would be located in an area with related commercial and transportation uses. Therefore, the proposed structures are not anticipated to have a substantial visual impact along existing and proposed public Airport facilities and Airport access routes.

5.1.4.5 Coastal Ecosystems

Objective: Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

a. Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;

b. Improve the technical basis for natural resource management;

c. Preserve valuable coastal ecosystems, including reefs, of significant biological or economic importance;

d. Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and

e. Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and non-point-source water pollution control measures.

Alternative 5 is not anticipated to result in adverse impacts to coastal ecosystems. Drainage improvements include the construction and operation of two storm water detention basins to prevent an increase in runoff from Alternative Site 5. Applicable BMPs and erosion-control measures would be implemented to mitigate

runoff during construction-related activities. In addition, provisions that address onsite storage of fuel or other chemicals related to the ConRAC facility operations would be implemented to ensure against degradation of coastal water ecosystems in the event of fuel spillage.

The construction plans and specifications for the proposed ConRAC facility and related improvements would include BMPs to minimize erosion on the project site during and after construction and would also include measures to contain runoff onsite during the construction period. Construction would occur approximately 2,500 feet inland of the shoreline; nevertheless, temporary erosion control measures would be used during construction to prevent runoff into and siltation of nearby coastal waters. These measures, which include considerations related to development of the proposed ConRAC facility within a floodway, include the construction and operation of two storm water detention basins to provide compensatory floodplain storage, and protection of the Kalialinui Stream channel through the Alternative 5 site. The detention basins would be designed in compliance with FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants on or Near Airports*, to minimize their attractiveness to wildlife.

The project plans would include water pollution and erosion controls related to the specific erosion and sediment control practices for exposed areas and use of materials in the work areas. The contract specifications would also include sections on environmental controls and pollution controls, which set forth the required actions to be implemented during construction to protect adjacent and downstream areas from runoff and discharge of pollutants.

5.1.4.6 Economic Uses

Objective: Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

a. Concentrate coastal dependent development in appropriate areas;

b. Ensure that coastal dependent development, such as harbors and ports, and coastal related development, such as visitor industry facilities and energy generating facilities, are located, designed, and constructed to minimize adverse social, visual, and environmental impacts in the coastal zone management area; and

c. Direct the location and expansion of coastal dependent developments to areas designated and used for such development, permit reasonable long-term growth in such areas, and permit coastal dependent development outside of such designated areas when the:

   i. Use of presently designated locations is not feasible;

   ii. Adverse environmental effects are minimized; and

   iii. Development is important to the State's economy.

The proposed ConRAC facility at Alternative Site 5 would provide upgraded rental car facilities and improve the experience for visitors arriving at Kahului Airport. Further, development of the ConRAC facility would be located on a site that was approved for use as a parking lot. Development of the ConRAC facility at

Alternative Site 5 would be compatible with surrounding land uses and represent an enhancement of the previously approved use. As a facility designed to enhance Airport operations, the ConRAC facility would benefit the State and local economy.

In the short term, the proposed project would provide employment during construction and would benefit the local population.

5.1.4.7 Coastal Hazards

Objective: Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.

Policies:

a. Develop and communicate adequate information about tsunami, storm waves, flooding, erosion, subsidence, and point and non-point-source pollution hazards;

b. Control development in areas subject to tsunami, storm waves, flooding, erosion, hurricanes, wind, subsidence, and point and non-point-source pollution hazards;

c. Ensure that development complies with requirements of the Federal Flood Insurance Program; and

d. Prevent coastal flooding from inland projects.

According to the FIRM for the Airport, the proposed ConRAC facility at Site 5 would be located in Flood Zone AE, an area subject to inundation by the 1-percent-annual-chance flood event, with a base flood elevation of approximately 25 feet above mean sea level. Additionally, the proposed ConRAC facility would be located within a designated floodplain. The proposed ConRAC facility would be designed such that it would not alter flooding characteristics or raise flood heights. Additionally, Flood Development Permits would be sought, as appropriate.

The proposed ConRAC facility would be located away from other environmentally sensitive areas and areas prone to other coastal hazards, such as storm waves and coastal erosion. The proposed ConRAC facility would be located inland of the tsunami evacuation area and would not impede with evacuation efforts in the event of a tsunami.

5.1.4.8 Managing Development

Objective: Improve the development review process, communication, and public participation in the management of coastal resources and hazards.

Policies:

a. Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;

b. Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and

c. Communicate the potential short- and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.

Opportunities for review and input regarding the Proposed Action are provided through the EA and SMA permit processes. The proposed development is seen as an enhancement of a planned use defined in the 1997 Kahului Airport Master Plan. The proposed development would be located in proximity to the primary use of the area for an airport as well as other compatible land uses.

Agencies and interested parties were engaged in early consultation during preparation of this Draft EA. Comments received in response to the early consultation letter and responses are included in Appendix A of this Draft EA. The availability of the Draft EA was published in the *Environmental Notice*, a twice-monthly publication from the State of Hawaii, Department of Health, Office of Environmental Quality Control (OEQC), which began the 30-day public comment period. Comments received on the Draft EA are included in Appendix I.

5.1.4.9 Public Participation

Objective: Stimulate public awareness, education, and participation in coastal management.

Policies:

a. Promote public involvement in coastal zone management processes;

b. Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and

c. Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

While the site for the Proposed Action is located within the Kahului Airport Master Plan area, which has been subject to extensive public input, the proposed ConRAC facility is subject to processes that facilitate public awareness, education, and participation. The EA and SMA permitting processes provide channels for public awareness, education, and participation and will address the technical characteristics of the specific project, as well as environmental impacts and proposed mitigation measures. The Proposed Action is subject to a public hearing before the Maui Planning Commission in connection with requirements of the SMA process.

5.1.4.10 Beach Protection

Objective: Protect beaches for public use and recreation.

Policies:

a. Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;

b. Prohibit construction of private erosion-protection structures seaward of the shoreline, except when they result in improved aesthetic and engineering solutions to erosion at the sites and do not interfere with existing recreational and waterline activities; and

c. Minimize the construction of public erosion-protection structures seaward of the shoreline.

Alternative Site 5 is situated approximately 2,500 feet inland of the shoreline. As such, adverse effects on beach processes are not anticipated. Appropriate BMPs would be implemented to mitigate storm water runoff associated with the project and to ensure that impacts to downstream and adjoining areas are mitigated.

5.1.4.11 Marine Resources

Objective: Promote the protection, use, and development of marine and coastal resources to ensure their sustainability.

Policies:

a. Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;

b. Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;

c. Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;

d. Promote research, study, and understanding of ocean processes, marine life, and other ocean resources to acquire and inventory information necessary to understand how ocean development activities relate to and affect ocean and coastal resources; and

e. Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.

The proposed project would not increase runoff from the project site. Implementation of appropriate BMPs and the provision of storm water detention basins would mitigate potential impacts to downstream marine and coastal resources.

In addition to the foregoing objective and policies, Section 205A-30.5, HRS, "Prohibitions," provides specifications for the limitation of lighting in coastal shoreline areas in relation to the granting of SMA permits:

a. No special management area use permit or special management area minor permit shall be granted for structures that allow artificial light from floodlights, uplights, or spotlights used for decorative or aesthetic purposes when the light:

    i. Directly illuminates the shoreline and ocean waters; or

    ii. Is directed to travel across property boundaries toward the shoreline and ocean waters.

b. Subsection (a) shall not apply to special management area use permits for structures with:

Artificial lighting provided by a government agency or its authorized users for government operations, security, public safety, or navigational needs provided that a government agency or its authorized users shall make reasonable efforts to properly position or shield lights to minimize adverse impacts.

The proposed ConRAC facility would be located approximately 2,500 feet inland of the shoreline. Lighting installed in conjunction with the proposed project would not directly illuminate the shoreline or ocean waters nor would it direct light across property boundaries toward the shoreline or ocean waters. All lighting would comply with applicable requirements of the County's Outdoor Lighting Ordinance. Exterior lighting would be downward facing and fully shielded.

5.2 Significance Criteria Assessment

The potential impacts of the Proposed Action have been evaluated based on the significance criteria in HAR § 11-200-12. The following is a list of the criteria, followed by either a summary of the potential impacts or reference to relevant discussions earlier in this EA.

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

The Proposed Action would not cause the loss or destruction of any natural or cultural resource because there would be no disturbance of any known natural or cultural resources within the development area. HDOT-A will comply with the recommendations of SHPD including implementation of protocols should there be an inadvertent discovery during any ground altering activity.

Curtails the range of beneficial uses of the environment

The Proposed Action would not curtail the range of beneficial uses of the environment. As discussed in Section 4.12, "DOT Section 4(f) Lands" all project components of the Proposed Action would be within the existing OGG boundaries and they would not be within any public parks; recreation areas; or wildlife or waterfowl refuges. The improvements under the Proposed Action would be in areas without existing beneficial uses of the environment.

Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS

The Proposed Action would be in conformance with HRS Chapter 343, inclusive of its individual policies, goals, and guidelines for population growth; natural resources; biological resources; parks, recreation, and open space; transportation; energy; and culture, as discussed in the individual resource categories throughout Chapter 4.

Substantially affects the economic or social welfare of the community or State

As discussed in Section 4.3, "Socioeconomic Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks," the Proposed Action would not affect the economic or social welfare of the communities surrounding OGG or the State.

Substantially affects public health

As discussed in Section 4.1, "Noise," Section 4.5, "Air Quality," and Section 4.7, "Water Quality," the Proposed Action would not impact public health. As discussed in Section 4.3.4, "Children's Environmental Health and Safety Risks," the Proposed Action would not affect Children's Environmental Health and Safety.

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

As discussed in Section 4.4, "Secondary (Induced) Impacts," the Proposed Action would not result in significant secondary impacts.

Involves a substantial degradation of environmental quality

As discussed in Section 4.1, "Noise," Section 4.5, "Air Quality," and Section 4.7, "Water Quality," the Proposed Action would not result in degradation of environmental quality.

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

As discussed in Section 4.19, "Cumulative Impacts," the Proposed Action would not result in significant cumulative impacts or involve any commitment to larger actions.

Substantially affects a rare, threatened, or endangered species, or its habitat

As discussed in Section 4.11, "Fish, Wildlife, and Plants," the Proposed Action may indirectly impact the endangered Hawaiian hoary bat and/or habitat for the endangered Blackburn's sphinx moth. However, these impacts would be incidental to the species and would not result in an impact that would significantly affect existing populations or habitat.

Detrimentally affects air or water quality or ambient noise levels

As discussed in Section 4.1, "Noise," Section 4.5, "Air Quality," and Section 4.7, "Water Quality," the Proposed Action would not detrimentally affect air or water quality or ambient noise levels.

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

As discussed in Section 4.9, "Floodplains," the Proposed Action would affect the 100-year floodplain associated with Kalialinui Stream. However, there is no private property or residential land uses located down-gradient of the Alternative Site 5, thus, the proposed development would not impose a flood hazard on

other properties or impair human health, safety, or welfare. As discussed in Section 4.10, "Coastal Resources," the Proposed Action would not conflict with the State's CZMP or be likely to suffer damage from being located in any these environmentally sensitive areas.

Substantially affects scenic vistas and view planes identified in county or states plans or studies

As discussed in Section 4.14, "Light Emissions and Visual Impacts," under the Proposed Action the new facilities would not substantially affect view corridors or views from the OGG entrance. The most distinct visual features within areas surrounding the Proposed Action site are the coast, the Kanahā Pond Wildlife Sanctuary, and the City of Kahului. As none of these features is located on or immediately adjacent to the Airport, they would not be directly affected by the Proposed Action.

Requires substantial energy consumption

As discussed in Section 4.16, "Natural Resources and Energy Supply," the Proposed Action would require the consumption of petroleum products and petroleum based electrical generation. Because passenger growth and flight operations growth would be the same under any of the alternatives under consideration, there would be no anticipated long-term operational differences in energy consumption under the Proposed Action compared to the No Action Alternative. The Proposed Action would effectively reduce the consumption of natural resources because returning rental car customers would not need to circulate through the terminal roadways and photovoltaic solar panels may be installed to generate power. The Proposed Action would also result in elimination of the rental car shuttle buses, which would further reduce natural resources consumption.

5.3 List of Permits and Approvals

The following permits and approvals will be required prior to the implementation of the Proposed Action.

5.3.1 FEDERAL GOVERNMENT

- National Environmental Policy Act, Finding of No Significant Impact

5.3.2 STATE OF HAWAII

- Hawaii Revised Statutes, Chapter 343 Compliance
- National Pollutant Discharge Elimination System (NPDES) Permit, as applicable
- Community Noise Permit, as applicable

5.3.3 COUNTY OF MAUI

- Special Management Area Use Permit
- Construction Permits, as applicable

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6. Agency and Public Involvement

This chapter discusses outreach to various federal, State, and local agencies conducted to obtain input on the Proposed Action and its alternatives, and the potential effects each would have on the environment.

6.1 Agency Scoping

The HDOT-A sent introduction letters regarding the Proposed Action and its alternative to local elected officials and to individuals representing federal, State, and local agencies with jurisdiction over resources either known to be in the vicinity of the Airport or that could be present in the area. The purpose of the letters was to inform the agencies and elected officials about the proposed project, the EA process, the preliminary purpose and need for the ConRAC facility, the preliminary alternatives, and to solicit comments on issues of concern that they would like addressed in the EA.

A sample letter and the list of individuals, agencies, and elected officials to whom the letter was sent to are provided in **Appendix A**.

Sixteen scoping comment letters on the proposed project were received from the following agencies:

- State of Hawaii, Department of Business, Economic Development and Tourism, Hawaii Housing Finance and Development Corporation
- State of Hawaii, Department of Defense, Office of the Director of Civil Defense
- County of Maui, Department of Parks & Recreation
- State of Hawaii, Department of Land and Natural Resources, Land Division
- State of Hawaii, Department of Accounting and General Services
- State of Hawaii, Department of Health, Environmental Planning Office
- State of Hawaii, Department of Health, Maui District Health Office
- County of Maui, County Council
- State of Hawaii, Department of Business, Economic Development and Tourism, Office of Planning
- Hawaiian Telecom

- County of Maui, Department of Public Works
- County of Maui, Planning Department
- County of Maui, Department of Environmental Management
- County of Maui, Department of Housing and Human Concerns, Housing Division
- State of Hawaii, Department of Land and Natural Resources, Commission on Water Resource Management
- Maui Electric Company

The State Department of Health, Maui District Health Office; the State Department of Business, Economic Development and Tourism, Office of Planning; the State Department of Land and Natural Resources, Commission on Water Resource Management; and the County Department of Environmental Management, were the only agencies that provided comments and recommendations. Copies of the comment letters are also included in Appendix A. Coordination with the State Historic Preservation Division (SHPD), the Office of Hawaiian Affairs, and the U.S. Fish & Wildlife Service (USFWS) also was initiated. Copies of letters to these agencies are also included in Appendix A.

6.2 Draft EA Agency and Public Review

The Draft EA was released for agency and public review on March 8, 2013 for a 30-day comment period, which ran from March 8, 2013 through April 8, 2013. The Draft EA was filed with the Office of Environmental Quality Control (OEQC) and a notice that the Draft EA was published was provided in OEQC's *Environmental Notice* on March 8, 2013. Newspaper notices advertising the availability of the Draft EA were also published in the March 8, 2013 editions of the *Maui News* and the *Honolulu Star Advertiser* (see **Appendix I**).

Nineteen comment letters from agencies and the public were received on the Draft EA. Comment letters were received from:

- U.S. Army Corps of Engineers, Honolulu Regulatory Branch
- U.S. Department of Homeland Security, Federal Emergency Management Agency Region IX, Floodplain Management and Insurance Branch
- U.S. Department of Agriculture, Natural Resources Conservation Service
- State of Hawaii, Department of Education
- State of Hawaii, Department of Health, Clean Water Branch
- State of Hawaii, Department of Health, Environmental Planning Office (two letters)
- State of Hawaii, Department of Health, Indoor and Radiological Health Branch
- State of Hawaii, Department of Health, Maui District Health Office
- State of Hawaii, Department of Land and Natural Resources, Engineering Division

- State of Hawaii, Office of Planning
- County of Maui, Department of Fire and Public Safety, Fire Prevention Bureau
- County of Maui, Department of Housing and Human Concerns, Housing Division
- County of Maui, Department of Parks & Recreation
- County of Maui, Department of Planning
- County of Maui, Department of Public Works
- County of Maui, Planning Commission
- Isaac Davis Hall, Attorney at Law
- Hawaiian Telecom

6.3 Responses to Agency and Public Comments

All agency and public comment letters received during the scoping and Draft EA review periods were cataloged and comments identified. Each letter was assigned a two-letter designation followed by a number. The two-letter designation code corresponds to:

AF = Federal Agency
AS = State Agency
AL = Local Agency
PC = Public Comment

Every comment in each letter was assigned two numbers. The first number matches the letter number; comments were then numbered sequentially within each letter. **Table 6-1** provides the letter codes for each letter received, identifies the commenter and whether the letter was received during the scoping or Draft EA comment periods, and identifies the comment numbers associated with each comment letter. **Table 6-2** provides the individual comments and responses to each comment. Appendix I contains each of the comment letters received, marked with their letter and comment codes, and the response to each letter.

Table 6-1 (1 of 2) Comment Letter Summary Matrix

COMMENT LETTER DESIGNATION	COMMENTER	SCOPING LETTER	DRAFT EA COMMENT LETTER	COMMENT NUMBERS
AF-01	George P. Young, P.E., Chief, Regulatory Branch, Department of the Army, U.S. Army Engineer District, Honolulu		X	1-1 through 1-4
AF-02	Gregor Blackburn, CFM, Branch Chief, Floodplain Management and Insurance Branch, U.S. Department of Homeland Security, Federal Emergency Management Agency Region IX		X	2-1 through 2-6
AF-03	Ranae Ganske-Cerizo, District Conservationist, Natural Resources Conservation Service, U.S. Department of Agriculture		X	3-1
AS-01	Kenneth G. Masden II, Public Works Manager, Planning Section, Facilities Development Branch, State of Hawaii Department of Education		X	4-1
AS-02	Laura McIntyre, AICP, Manager, Environmental Planning Office, State of Hawaii Department of Health		X	5-1 through 5-4
AS-03	Laura McIntyre, AICP, Manager, Environmental Planning Office, State of Hawaii Department of Health		X	6-1
AS-04	Patti Kitkowski, District Environmental Health Program Chief, State of Hawaii Department of Health, Maui District Health Office		X	7-1 through 7-4
AS-05	Carty S. Chang, Chief Engineer, State of Hawaii Department of Land and Natural Resources, Engineering Division		X	8-1 through 8-4
AS-06	Jesse K. Souki, Director, Office of Planning, State of Hawaii		X	9-1 through 9-3
AS-07	Karen Seddon, State of Hawaii Department of Business, Economic Development and Tourism, Hawaii Housing Finance and Development Corporation	X		18-1
AS-08	Russell Y. Tsuji, Land Administrator, State of Hawaii Department of Land and Natural Resources, Land Division	X		19-1
AS-09	Dean H. Seki, Comptroller, State of Hawaii, Department of Accounting and General Services	X		20-1 through 20-2
AS-10	Laura McIntyre, AICP, Manager, Environmental Planning Office, State of Hawaii Department of Health	X		21-1 through 21-2
AS-11	Patti Kitkowski, District Environmental Health Program Chief, State of Hawaii Department of Health, Maui District Health Office	X		22-1 through 22-3
AS-12	Jesse K. Souki, Director, Office of Planning, State of Hawaii	X		23-1 through 23-2
AS-13	Doug Mayne, State of Hawaii, Department of Defense, Office of the Director of Civil Defense	X		24-1

Table 6-1 (2 of 2) Comment Letter Summary Matrix

COMMENT LETTER DESIGNATION	COMMENTER	SCOPING LETTER	DRAFT EA COMMENT LETTER	COMMENT NUMBERS
AS-14	Russell Y. Tsuji, Land Administrator, State of Hawaii Department of Land and Natural Resources, Land Division	X		25-1 through 25-7
AS-15	Alec Wong, P.E., Chief, Clean Water Branch, State of Hawaii Department of Health		X	34-1 through 34-8
AS-16	Jeffrey M. Eckerd, Program Manager, Indoor and Radiological Health Branch, State of Hawaii Department of Health		X	35-1
AL-01	Paul Haake, Captain, Fire Prevention Bureau, Maui County Department of Fire & Public Safety		X	10-1
AL-02	Wayde T. Oshiro, Housing Administrator, Department of Housing and Human Concerns, Housing Division, County of Maui		X	11-1
AL-03	Glenn T. Correa, Director of Parks & Recreation, Department of Parks & Recreation		X	12-1
AL-04	Clayton I. Yoshida, AICP, Planning Program Administrator, County of Maui Department of Planning		X	13-1
AL-05	David C. Goode, County of Maui, Department of Public Works		X	16-1 through 16-3
AL-06	William Spence, Planning Director, Maui Planning Commission, Comments on Draft EA Received at 4/23/13 Meeting		X	17-1 through 17-10
AL-07	Glenn T. Correa, Director of Parks & Recreation, Department of Parks & Recreation	X		26-1
AL-08	Joeseph Pontanilla, County Council, County of Maui	X		27-1
AL-09	Kyle K. Ginoza, P.E., Director of Environmental Management, County of Maui, Department of Environmental Management	X		28-1 through 28-9
AL-10	David C. Goode, County of Maui, Department of Public Works	X		29-1
AL-11	Clyde Almeida, County of Maui, Housing Division	X		30-1
AL-12	Paul Fasi, County of Maui Department of Planning	X		31-1
PC-01	Isaac Davis Hall, Attorney at Law		X	14-1 through 14-8
PC-02	Tom Hutchison, OSP Engineer, Hawaiian Telcom, Inc.		X	15-1
PC-03	Tom Hutchison, OSP Engineer, Hawaiian Telcom, Inc.	X		32-1
PC-04	Ray Okazaki, Supervisor, Engineering, Maui Electric Company, Ltd.	X		33-1

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Table 6-2 Responses to Agency and Public Comments

COMMENT #	COMMENT SUMMARY	RESPONSE
AF-01	**George P. Young, P.E., Chief, Regulatory Branch Department of the Army, U.S. Army Engineer District, Honolulu**	
1-1	This project is assigned reference number POH-2012-00170. Please cite this reference number in any future correspondence concerning this project.	Comment noted.
1-2	We have completed our review of the submitted document pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C 403) (Section 10) and Section 404 of the Clean Water Act (33 U.S.C. 1344) (Section 404). Section 10 requires that a DA permit be obtained from the U.S. Army Corps of Engineers (Corps) prior to undertaking any work activity occurring in, over, or under and affecting navigable waters of the U.S. For tidal waters, the shoreward limit of the Corps' jurisdiction extends to the Mean High Water (MHW) elevation. Section 404 requires that a DA permit be obtained for the discharge (placement) of dredged and/or fill material into waters of the U.S., including wetlands. For tidally influenced waters, in the absence of adjacent wetlands, the shoreward limit of the Corps' jurisdiction extends to the High Tide Line (HTL) elevation, which in Hawai'i may be approximated by reference to the Mean Higher High Water (MHHW) elevation. For non-tidal waters, the lateral limits of the Corps' jurisdiction extend to the Ordinary High Water Mark (OHWM) or the approved delineated boundary of any adjacent wetlands.	Please see Section 3.7.2, "Water Resources", Section 3.7.3, "Wetlands", and Section 3.7.5, "Coastal Areas" for a discussion of the wetland and coastal resources in the vicinity of the Airport. The Alternative 5 site lies on 16.7 acres of undeveloped land, as well as land with temporary structures (UPS package processing facility). This site is slightly concave in shape, with the lowest elevations situated alongside the Kalialinui Stream channel, which passes directly under the site in a buried concrete culvert. Kalialinui Stream, which is the only aquatic resource on or near the Alternative 5 site, was evaluated for its potential to be included in Waters of the United States. The "relevant reach" of Kalialinui Stream stretches upstream from the "Traditional Navigable Water," the Pacific Ocean, for 16,000 linear feet to just below the Haiku Ditch at 180 feet above msl where the first small unnamed tributary flows into Kalialinui Stream. This stretch of Kalialinui Stream was found to be an ephemeral stream, a "Non-Relatively Permanent Water", without adjacent wetlands. Using a significant Nexus Determination analysis, Kalialinui Stream was found to be included in the jurisdictional Waters of the United States. The reach of the Kalialinui Stream that crosses the Proposed Action site is buried in a concrete culvert that would not be affected by construction or operation of the proposed ConRAC facility; thus, there would be no impact to jurisdictional Waters of the United States.
1-3	Based on the submitted information and available resources, we have identified the following aquatic resources, which may be subject to the Corps' regulatory jurisdiction, present within and adjacent to the Kahului Airport boundary: 1) Kanaha Pond and Wildlife Sanctuary; 2) Kalianui Gulch; 3) an unnamed Corps-verified wetland (Corps letter dated February 28,2013); and 4) the Pacific Ocean. Once a project alternative is selected for development, we recommend you submit the proposed project plans for our review and request a DA permit determination.	Please see Section 3.7.2, "Water Resources", Section 3.7.3, "Wetlands", and Section 3.7.5, "Coastal Areas" for a discussion of the wetland and coastal resources in the vicinity of the Airport. A wetland survey of the Alternative 5 site was conducted to determine whether any wetland or jurisdictional Waters of the United States are present within the site. No wetlands were found on the Alternative 5 site and the site was determined to consist of entirely non-wetland uplands, as defined by the U.S. ACE. The preferred alternative, Alternative Site 5, would have no effect on these resources. The Kalialinui Stream [Gulch] traverses Alternative Site 5 in an underground culvert, which would be protected and maintained throughout construction and operation of the proposed ConRAC facility.
1-4	You are encouraged to provide comments on your experience with the Honolulu District Regulatory Branch by accessing our web-based customer survey form at http://per2.nwp.usace.army.mil/survey.html.	Comment noted.

COMMENT #	COMMENT SUMMARY	RESPONSE
AF-02	**Gregor Blackburn, CFM, Branch Chief Floodplain Management and Insurance Branch, U.S. Department of Homeland Security Federal Emergency Management Agency Region IX**	
2-1	Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Maui (Community Number 150003), Maps revised September 19, 2012. Please note that the County of Maui, Hawaii is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.	The updated September 2012 Flood Insurance Rate Map is provided in Section 3.7.4, "Floodplains" and the text was revised to discuss potential effects to floodplains based on that map. HDOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. HDOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.
2-2	All buildings constructed within a riverine floodplain (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM) must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.	The proposed ConRAC facility would be constructed so that the lowest occupied floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map for the area. Section 4.9, "Floodplains" has been revised to describe the building in relation to the Base Flood Elevation.
2-3	If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.	HDOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. HDOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.
2-4	All buildings constructed within a coastal high hazard area (any of the "V" Flood Zones as delineated on the FIRM) must be elevated on pilings and columns so that the lowest horizontal structural member (excluding the pilings and columns) is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.	All structures associated with the Proposed Action would be constructed outside of "V" Flood Zones delineated on the FIRM, outside of coastal high hazard areas.
2-5	Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 653, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.	Comment noted. HDOT-A would submit hydrologic and hydraulic data corresponding to any changed conditions within the 100-year floodplain associated with Kalialinui Gulch within six months of completion of the ConRAC project.

COMMENT #	COMMENT SUMMARY	RESPONSE
2-6	Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Maui County floodplain manager can be reached by calling Francis Cerizo, FPA, Staff Planner, at (808) 270-7771.	Comment noted. HDOT-A is coordinating with the Maui County Planning Department on potential effects to the 100-year floodplain. Following discussions with the County Planning Department, an application for a Letter of Map Revision (LOMR) will be filed by the HDOT-A or its consultants in the near future for the Kahului Airport area. The County Planning Department noted that the LOMR would amend the existing flood designations for the Kahului Airport area, including the proposed project site. HDOT-A will continue to coordinate with the Planning Department on the LOMR application.
AF-03	**Ranae Ganske-Cerizo, District Conservationist** **Natural Resources Conservation Service, U.S. Department of Agriculture**	
3-1	I have no comments at this time.	Comment noted.
AS-01	**Kenneth G. Masden II, Public Works Manager** **Planning Section, Facilities Development Branch, State of Hawaii Department of Education**	
4-1	The DOE has no comment to offer regarding this project.	Comment noted.

COMMENT #	COMMENT SUMMARY	RESPONSE
AS-02	**Laura McIntyre, AICP, Manager** **Environmental Planning Office, State of Hawaii Department of Health**	
5-1	Thank you for allowing us to review and comment on the subject document. Your document was routed to the Clean Water and Indoor & Radiological Health Branches. They will provide specific comments to you if necessary. EPO recommends that you review the Standard Comments (www.hawaii.gov/health/epo under the land use tab). You are required to adhere to all Standard Comments specifically applicable to this application.	Comment noted. The Standard Comments referenced in the comment letter were reviewed, as recommended. Responses to the Standard Comments are provided below. • Hazard Evaluation and Emergency Response Office – No known release of petroleum, hazardous substances, pollutants, or contaminants has occurred on the site. The Proposed Action site was not formerly used for sugarcane production. • Clean Air Branch – Measures to minimize fugitive dust would be incorporated into the construction plans, as discussed in Section 4.18, "Construction Impacts". • Clean Water Branch – Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements. • Safe Drinking Water Branch – The Proposed Action would not affect public drinking water sources. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements. • Solid and Hazardous Waste Branch – Section 4.17, "Hazardous Materials, Pollution Prevention, and Solid Waste", discusses potential effects of the Proposed Action on hazardous materials and solid waste. The Proposed Action would not include underground storage tanks. Gasoline storage tanks associated with the proposed ConRAC facility would be aboveground, installed and operated in compliance with all federal, State, and local regulations. • Wastewater Branch – The proposed ConRAC facility's restrooms and potable water would connect to the existing sewer system and would not generate significantly increased levels of wastewater. The car washing facilities would have a separate collection system that would include a recycling system to minimize the amount of wastewater generated by car washing activities. No wastewater from the car washing facilities would drain into the County sewer system. • Noise, Radiation & Indoor Air Quality Branch – The proposed ConRAC facility would comply with the Administrative Rules of the Department of Health. Also, see response to Comment 7-2 concerning construction noise.

COMMENT #	COMMENT SUMMARY	RESPONSE
5-2	EPO suggests that you examine the many sources available on strategies to support the sustainable design of communities, including the: U.S. Environmental Protection Agency's sustainability programs: www.epa.gov/sustainability U.S. Green Building Council's LEED program: www.new.usgbc.org/leed The DOH encourages everyone to apply these sustainability strategies and principles early in the planning and review of projects.	Comment noted. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.
5-3	We also request that for future projects you consider conducting a Health Impact Assessment (HIA). More information is available at www.cdc.gov/healthyplaces/hia.htm. We request you share all of this information with others to increase community awareness on sustainable, innovative, inspirational, and healthy community design.	Comment noted.
5-4	We request a written response confirming receipt of this letter and any other letters you receive from DOH in regards to this submission. You may mail your response to 919 Ala Moana Blvd., Ste. 312, Honolulu, Hawaii 96814. However, we would prefer an email submission to epo@doh.hawaii.gov. We anticipate that our letter(s) and your response(s) will be included in the final document. If you have any questions, please contact me at (808) 586-4337.	A written response confirming receipt of this letter was transmitted via email on March 18, 2013 from Ura Quoniou, Ricondo & Associates, Inc. In addition, all letters received on this project received a written response from HDOT-A (see Appendix I).
AS-03	**Laura McIntyre, AICP, Manager** **Environmental Planning Office, State of Hawaii Dept. of Health**	
6-1	No Comment.	Comment noted.
AS-04	**Patti Kitkowski, District Environmental Health Program Chief** **State of Hawaii Department of Health, Maui District Health Office**	
7-1	National Pollutant Discharge Elimination System (NPDES) permit coverage may be required for this project. The Clean Water Branch should be contacted at 808 586-4309.	Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements. The text notes that "The Hawaii Department of Health administers the National Pollutant Discharge Elimination System (NPDES) permit program in Hawaii, pursuant to the Clean Water Act. The HDOT-A has a National Pollutant Discharge Elimination System (NPDES) General Permit for industrial storm water discharges for the Airport and has developed a Storm Water Pollution Control Plan to minimize discharges of pollutants into storm water and to maintain compliance with this general permit."

COMMENT #	COMMENT SUMMARY	RESPONSE
7-2	The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules (HAR), Chapter 11-46, "Community Noise Control." A noise permit may be required and should be obtained before the commencement of work. The Indoor & Radiological Health Branch should be contacted at 808-586-4700.	Section 4.18.1, "Construction Noise", discusses potential construction noise arising from the Proposed Action. The following language has been added to the text to address this comment: "According to HAR § 11-46-4 for Class C zoning districts including OGG, if construction noise exceeds a level of 70 dBA for more than 10 percent of the time within any 20 minute period at measurement points beyond the property line, then a Community Noise Permit is required. This 70 dBA threshold is applicable for both daytime and nighttime operations within Class C zoning districts. To mitigate potential noise impacts, contractors are required to use reasonable and standard practices, such as using mufflers on diesel and gasoline engines and using properly tuned and balanced machines. HDOT-A can also require additional noise mitigation by contractors, such as a requirement to place temporary noise barriers or restrictions on certain kinds of construction activities to certain times of the day. Use of these mitigation measures combined with the distance from the various construction sites to the OGG property boundary is anticipated to reduce noise levels below the 70 dBA permit threshold at the OGG property boundary. However, if it is determined that noise levels from construction activities below the 70 dBA threshold cannot be achieved for some activities, then HDOT-A would apply for and obtain approval for a Community Noise Permit from the Hawaii Department of Health prior to conducting those activities."
7-3	The project shall connect to the county sewer system.	Comment noted.
7-4	It is strongly recommended that the Standard Comments found at the Department's website: http://hawaii.gov/health/environmental/env-planning/landuse/landuse.html be reviewed, and any comments specifically applicable to this project should be adhered to.	Comment noted. Please see response to Comment 5-1.
AS-05	**Carty S. Chang, Chief Engineer** **State of Hawaii Department of Land and Natural Resources, Engineering Division**	
8-1	Please take note that based on the maps provided it appears that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zones X and AE. The Flood Insurance Program does not have any regulations for developments within Flood Zone X however; it does regulate developments within Zone AE as indicated in bold letters below.	Section 3.7.4, "Floodplains" and Section 4.9, "Floodplains" discuss floodplains in the vicinity of the Airport and potential effects of the Proposed Action on floodplains. Please see response to Comment 2-2. HDOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. HDOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.
8-2	Please note that the project must comply with the rules and regulation, of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.	Comment noted. Section 3.7.4, "Floodplains" and Section 4.9, "Floodplains" discuss floodplains in the vicinity of the Airport and potential effects of the Proposed Action on floodplains. Also, please see responses to Comments 2-2 and 2-3.

COMMENT #	COMMENT SUMMARY	RESPONSE
8-3	Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinance, please contact the applicable County NFIP Coordinators below: Mr. Carolyn Cortez at (808) 270-7813 of the County of Maui, Department of Planning.	Comment noted. Section 3.7.4, "Floodplains" and Section 4.9, "Floodplains" discuss floodplains in the vicinity of the Airport and potential effects of the Proposed Action on floodplains. Also, please see response to Comment 2-6.
8-4	The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.	The proposed ConRAC facility would consolidate existing facilities and functions into one location. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.
AS-06	**Jesse K. Souki, Director, Office of Planning State of Hawaii**	
9-1	Besides compliance with the National Environmental Policy Act, this EA was also prepared to comply with the Hawaii Environmental Protection Act, as codified in Hawaii Revised Statutes (HRS) Chapter 343. The Hawaii Coastal Zone Management (CZM) Act, HRS Chapter 205A, requires all state and county agencies to enforce the CZM objectives and policies. Section 5.1, Relationships to Plans, Policies, and Controls, pages 5-1 to 5-7, needs to discuss the proposed project's relationship to the Hawaii CZM Act. With the information provided in Section 4.10, Coastal Resources, Section 5.1 should be revised to include an assessment as to how the proposed project conforms to HRS Chapter 205A, CZM objectives and their supporting policies. This is an important component for satisfying the requirements of HRS Chapter 343, and obtaining the SMA use approval.	Comment noted. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act has been included in Section 5.1.
9-2	The National CZM Act requires direct federal activities and development projects to be consistent with approved state coastal programs to the maximum extent practicable. Also, federally-permitted, licensed, or assisted activities occurring in, or affecting the state's coastal zone must be in agreement with the Hawaii CZM Program's objectives and policies. Pursuant to HRS Chapter 205A, the Office of Planning is the lead agency of the Hawaii CZM Program. The Office of Planning is currently attached to the Department of Business, Economic Development and Tourism for administrative purposes. The statement of the Draft EA, on page 3-21, should be revised as, "According to ~~[the Hawaii Department of Business, Economic Development and Tourism]~~ the State of Hawaii Office of Planning, the Proposed Action is not on a list of federal actions that trigger a consistency ~~[determination]~~ concurrence with the State's Coastal Zone Management Program (CZMP)."	Text in Section 3.7.5 has been updated to state: "According to the State of Hawaii Office of Planning, the Proposed Action is not on a list of federal actions that trigger a consistency concurrence with the State's Coastal Zone Management Program (CZMP)."

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9-3	The comments in this letter related to the SMA use permit application provide guidance and are not regulatory. The planning department of the various counties is charged with assessing SMA permit applications. Final decision-making is vested in county planning commissions, or the county council.	Comment noted. HDOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action.
AS-07	**Karen Seddon, State of Hawaii Department of Business, Economic Development and Tourism Hawaii Housing Finance and Development Corporation**	
18-1	Thank you for seeking our comments on the proposed Roadway Improvements and ConRAC Facility at the Kahului Airport. We have no housing-related comments to offer at this time.	Comment noted.
AS-08	**Russell Y. Tsuji, Land Administrator State of Hawaii Department of Land and Natural Resources, Land Division**	
19-1	Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments. At this time the DLNR has no comments to offer on the subject matter.	Comment noted.
AS-09	**Dean H. Seki, Comptroller State of Hawaii, Department of Accounting and General Services**	
20-1	The proposed location does not impact any of the Department of Accounting and General Service's existing facilities in the area. However alternative site 3, if utilized, is located relatively close to our facilities on Mua Street. If this alternative site is used, it could possibly add additional vehicular traffic along Keolani Place.	Comment noted. As documented in Chapter 2, "Alternatives", Alternative Site 3 was not carried forward as a feasible alternative for detailed analysis.
20-2	We have no other comments to offer at this time. Once the EA is prepared, please allow us to review the document to ensure that our facilities are not adversely impacted.	Comment noted. The Draft EA was submitted to the Department of Accounting and General Services on March 1, 2013 (as part of the SMA application) for review.
AS-10	**Laura McIntyre, AICP, Manager Environmental Planning Office, State of Hawaii Department of Health**	
21-1	The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time, but reserve the right to future comments. 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 application should be adhered to.	Comment noted. The Department's Standard Comments were reviewed (see response to Comment 5-1).

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21-2	The United States Environmental Protection Agency provides a wealth of information on their website including strategies to help protect our natural environment and build sustainable communities at: http://water.epa.gov/infrastructure/sustain/. The DOH encourages State and county planning departments, developers, planners, engineers and other interested parties to apply these strategies and environment principles whenever they plan or review new developments or redevelopments projects. We also ask you to share this information with others to increase community awareness on healthy, sustainable community design. If there are any questions about these comments please contact me by phone at 586-4337 or email: laura.mcintyre@doh.hawaii.gov.	Comment noted. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.
AS-11	**Patti Kitkowski, District Environmental Health Program Chief State of Hawaii Department of Health, Maui District Health Office**	
22-1	National Pollutant Discharge Elimination System (NPDES) permit coverage maybe required for this project. The Clean Water Branch should be contacted at 808 586-4309.	Please see response to Comment 7-1. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.
22-2	The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules (HAR), Chapter 11-46, "Community Noise Control." A noise permit may be required and should be obtained before the commencement of work. The Indoor and Radiological Health Branch should be contacted at 808586-4700.	Please see response to Comment 7-2.
22-3	It is strongly recommended that the Standard Comments found at the Department's website: http://hawaii.gov/health/environmental/env-planning/landuse/ landuse.html be reviewed, and any comments specifically applicable to this project should be adhered to.	Comment noted. The Department's Standard Comments were reviewed (see response to Comment 5-1).
AS-12	**Jesse K. Souki, Director Office of Planning, State of Hawaii**	
23-1	The entire state is defined to be within the Coastal Zone Management Area (Hawaii Revised Statutes (HRS) Section 205A-1 - definition of "coastal zone management area"). The Draft EA should include a section that addresses the proposed project's consistency with the objectives and policies set forth in HRS Section 205A-2.	Comment noted. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act was included in Section 4.10, "Coastal Resources" and has also been added to Section 5.1.

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	Based on data from the County of Maui Planning Department, it appears that four of the five on-airport sites being evaluated, Sites 1, 2, 3, and 5, are within the Special Management Area (SMA) established by the County of Maui.	Comment noted. HDOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act has been included in Section 5.1.
23-2	The County of Maui Planning Department should be consulted to confirm whether the on-airport sites to be examined, as well as any off-airport sites to be considered, are within the SMA, and if so determined, obtain SMA permit requirements for the proposed project. If it is determined that the sites (on-airport and off-airport) to be evaluated are within the SMA, the Draft EA should include a section that addresses the guidelines set forth in HRS Section 205A-26.	
AS-13	**Doug Mayne, State of Hawaii** **Department of Defense, Office of the Director of Civil Defense**	
24-1	After review of the documents provided for the subject project, we have determined that the proposed project area falls within coverage arcs of existing warning sirens. We anticipate reviewing the Draft Environmental Assessment upon its completion.	Comment noted. The Draft EA was submitted to the Department on March 8, 2013 for review.
AS-14	**Russell Y. Tsuji, Land Administrator** **State of Hawaii Department of Land and Natural Resources, Land Division**	
25-1	Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on August 14, 2012, enclosed are comments from the Commission on Water Resource Management on the subject matter.	Comment noted.
25-2	We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.	Comment noted. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The proposed ConRAC would relocate existing functions at the Airport into one location. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation.
25-3	We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/pp/index.htm.	As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

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25-4	We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/czm/initiative/lid.php.	Section 4.7, "Water Quality", discusses potential effects to water quality and the best management practices (BMPs) that would be incorporated into the project. Water quality BMPs would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements.
25-5	We recommend the use of alternative water sources, wherever practicable.	Comment noted. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. Potable water for restrooms, drinking water, car wash facilities, etc. would come from the Maui County Department of Water Supply. The car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.
25-6	The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.	As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. Potable water for restrooms, drinking water, car wash facilities, etc. would come from the Maui County Department of Water Supply. The car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.
25-7	For project landscaped areas, we recommend following the Landscape Industry Council of Hawaii's irrigation water conservation best practices (http://landscapehawaii.org/_library/images/lich_irrigation_water_position_statement%2020110107.pdf). We also recommend that stormwater be utilized onsite for irrigation needs to the extent possible, and that water efficient fixtures be used in the offices and vehicle washing facilities. A listing of the fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/products/index.html.	Comment noted. See responses to Comment 17-1 and 25-3.
AS-15	**Alec Wong, P.E., Chief, Clean Water Branch State of Hawaii Department of Health**	
34-1	The Department of Health (DOH), Clean Water Brach (CWB), acknowledges receipt of your letter dated March 6, 2013, requesting comments on the project. The DOH-CWB has reviewed the subject document and offers these comments.	Comment noted.

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34-2	Please note that our review is based solely on the information provided in the subject document and its compliance with the 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://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf.	Comment noted. The Clean Water Branch's Standard Comments (dated August 22, 2008) were reviewed. Please see response to Comment 5-1.
34-3	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).	Please see response to Comment 1-2 and Comment 7-1. Kalialinui Stream is not included in the State of Hawaii, Department of Health water quality monitoring assessment; however, the Department of Health reports that the waters off of Kanahā Beach are attaining water quality standards. Section 4.7, "Water Quality", discusses potential effects to water quality and the best management practices (BMPs) that would be incorporated into the project. Water quality BMPs would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements.
34-4	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). An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the CWB Individual NPDES Form through the e-Permitting Portal and the hard copy certification statement with a $1,000 filing fee. Please open the e-Permitting Portal website at: https://eha-cloud.doh.hawaii.gov/epermit/View/home.aspx. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the "CWB Individual NPDES Form." Follow the instruction to complete and submit this form.	Please see response to Comment 7-1. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.
34-5	If your project involves work in, over, or under Waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 438-9258) regarding their permitting requirements.	Please see response to Comment 1-2. The U.S. Army Corps of Engineers, Regulatory Branch has been contacted and coordinated with during the preparation of the EA.
34-6	Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters…" (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and HAR, Chapter 11-54.	As described in Section 4.8, "Wetlands", Kalialinui Stream, which lies in a culvert beneath the Alternative 5 site, is a jurisdictional Waters of the United States. Because this stream passes directly under the site in a buried concrete culvert, it would not be affected by the construction or operation of the proposed ConRAC facility if it is protected during construction and through implementation of BMPs. Kalialinui Stream would continue to serve as an ocean outlet for storm water originating on the Airport and as a key element of the Airport storm water drainage system.

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34-7	Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Non-compliance 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.	Comment noted. Drainage improvements include the construction and operation of two storm water detention basins to prevent an increase in runoff from Alternative site 5. Applicable BMPs and erosion-control measures would be implemented to mitigate runoff during construction-related activities as described in Section 4.19.3, "Construction Impacts – Water Quality". Also, please see response to Comment 25-5.
34-8	If you have any questions, please visit our website at: http://www.hawaii.gov/health/environmental/water/cleanwater/index.html, or contact the Engineering Section, CWB, at 586-4309.	Comment noted.
AS-16	**Jeffrey M. Eckerd, Program Manager, Indoor and Radiological Health Branch State of Hawaii Department of Health**	
35-1	Project activities shall comply with the following Administrative Rules of the Department of Health: • Chapter 11-46 Community Noise Control • Chapter 11-501 Asbestos Requirements • Chapter 11-503 Fees for Asbestos Removal & Certification • Chapter 11-504 Asbestos Abatement Certification Program	Comment noted. As described in the response to Comment 5-1, the proposed ConRAC facility would comply with the Administrative Rules of the Department of Health. See response to Comment 7-2 regarding Chapter 11-46, "Community Noise Control."
AL-01	**Paul Haake, Captain, Fire Prevention Bureau Maui County Department of Fire & Public Safety**	
10-1	Thank you for the opportunity to comment on the subject project. At this time, the Department of Fire & Public Safety has no comment in regards to the Draft EA or SMA application. Our department does reserve the right to comment during the building permit process and any special permit approvals, e.g., fuel storage, requested from our office.	Comment noted. HDOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.
AL-02	**Wayde T. Oshiro, Housing Administrator Department of Housing and Human Concerns, Housing Division, County of Maui**	
11-1	Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. At the present time, the Department has no additional comments to offer.	Comment noted.
AL-03	**Glenn T. Correa, Director of Parks & Recreation Department of Parks & Recreation**	
12-1	The Department of Parks & Recreation is in support of the project. Furthermore, the Department agrees that Alternative Sites 4 & 5 best meet the criteria for the Consolidated Rental Car Facility, and neither site will affect the County of Maui's Kanaha Beach Park.	Comment noted.

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AL-04	**Clayton I. Yoshida, AICP, Planning Program Administrator County of Maui Department of Planning**	
13-1	The parcel is located in the Special Management Area (SMA) and will be required to acquire a SMA Permit.	HDOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action.
AL-05	**David C. Goode, County of Maui Department of Public Works**	
16-1	The applicant shall be responsible for all required improvements as required by Hawaii Revised Statutes, Maui County Code and rules and regulations.	Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations. HDOT-A submitted a letter dated December 28, 2012 to the Department of Public Works, regarding its intent to waive the County building permit requirement for this project.
16-2	As applicable, construction plans shall be designed in conformance with Hawaii Standard Specifications for Road and Bridge Construction dated 2005 and Standard Details for Public Works Construction, 1984, as amended.	Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations.
16-3	As applicable, worksite traffic-control plans/devices shall conform to Manual on Uniform Traffic Control Devices for Streets and Highways, 2003.	Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations.
AL-06	**William Spence, Planning Director, Maui Planning Commission Comments on Draft EA Received at 4/23/13 Meeting**	
17-1	Provide more information on the visual appearance of the ConRAC Facility and how it will incorporate a Hawaiian sense of place into the design. Also requested consideration by HDOT-A to incorporate endemic and indigenous Hawaiian plants and fragrant plants as this facility will be the first and last impression for visitors to Maui.	Through input and direction from the airport stakeholders, the design team has identified and implemented a cultural theme and concept that is based on the Plantation Style architecture found locally in Wailuku and Lahaina. These cultural guiding principles informed decisions concerning overall building massing along with specific materials and color palette and would directly shape the building's aesthetics. The essence of the Plantation Style is a formal prominence created by a strong, simple roof form that diminishes in height on either end. The Plantation Style includes a central, prominent roof form as its major feature. The floor plan is massed around a central enclosed space and large perimeter lanai formed by large, deep roof overhangs. The ConRAC massing and proportions have been created following these Plantation Style principles. The facility would feature prominent roof forms topping the south and north edges along with metal trellis screening and masonry walls below. The entire structure would be surrounded by a landscape buffer featuring indigenous planting to soften and shield the building. Visitors to the facility would be welcomed into a large lanai that surrounds the central customer service area and circulation cores. These pedestrian areas would feature warm-colored, natural materials. Arranged prominently throughout the plaza would be plantings filled with indigenous Hawaiian vegetation that would greet and welcome customers with the fragrances and colors of Maui. A glass and trellis canopy above would protect visitors and form the primary roof of the Lanai while allowing visitors to

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		connect with the sun, sky and natural light. The materials for the facility would include a mix of colors and texture inspired by the Plantation Style and local natural features. The prominent use of Shell Stone references the historical use of coral stone on the island within the Plantation Style. In addition to the neutral colored Shell Stone, the project would feature a multi-colored Slate accent stone that would connect with the varied indigenous colors of Maui and set a baseline palette for the accent colors of the facility. The roofs, screening, trellis and storefronts would use dark bronze metal inspired by the rust and copper colors seen around the island. The wood accents in the ceiling treatments and handrail components would take inspiration from the historical use of Koa wood. These forms, materials and landscaping would create a cohesive composition that would incorporate a Hawaiian sense of place into the facility while forming a lasting impression for visitors.
17-2	Additional discussion on the source of water for the water feature for the Kahului Airport and the landscaping surrounding the ConRAC Facility. Explore the option of using "R-1" water from the County of Maui and/or reuse of the car wash water in the ConRAC Facility for irrigation purposes.	It is noted that HDOT-A met with Mayor Arakawa, most recently in March 2013, to discuss the potential use of R-1 water for irrigation purposes at the ConRAC facility. Based on those discussions, it is our understanding that 1) there are infrastructural improvements needed at the Wailuku-Kahului Wastewater Treatment Facility (WKWWTF) to treat the wastewater to the R-1 level and 2) that distribution infrastructure is needed to distribute the R-1 water from the WKWWTF. As such, HDOT-A would continue to communicate with Mayor Arakawa and his administration on the status of the needed improvements to provide R-1 water to the Kahului Airport site. The water feature identified in the comment is not part of the Proposed Action. However, the source of water for the water feature is non-potable water from the existing on-site A&B well. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. The car wash facilities in the ConRAC would utilize a recycling system to minimize water use; thus, this water would not be used for irrigation. As for the R-1 water, HDOT-A would provide future connection (stubs) for a potential future R-1 connection.

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17-3	Provide additional information on the height of the ConRAC Facility with the planned grades from Keolani Place and the Airport Access Road. Discussion may include information about set backs and landscaping screening.	General grading of the site would slope from 40 feet above ground level along the future inbound airport roadway down to 20 feet above ground level along the future outbound airport roadway. Site grading would level out towards Keolani Place. The ConRAC facility would sit on the project site with the basement level at 13 feet above existing ground level. Total building height would be limited to the absolute minimum with the highest point at approximately 60 feet above the basement floor. The design team is fully aware and respectful of the desire to limit the building height in keeping with the surrounding area. Several features have been incorporated into the design of the ConRAC facility that would achieve that goal. These include a 20-foot setback on the north and south sides, reducing the perimeter bays on Level 3, addition of perimeter canopies, and utilizing the natural grading of the site. When viewed from the terminal, only Level 2 and 3 would be visible therefore creating an impression of a 2-story building.
17-4	General support for the concept of the ConRAC Facility in that it will consolidate the rental car operations and assist in controlling environmental impacts from the individual operations.	Comment noted.
17-5	Ensure that the existing underground drainage channel (Kalialinui Stream) is protected during construction. Also requested consideration for installation of grating over the drainage channels for public safety and maintenance.	The reach of the Kalialinui Stream that crosses the Proposed Action site is buried in a concrete culvert that would not be affected by construction or operation of the proposed ConRAC facility. HDOT-A will examine whether the installation of grates for public safety and maintenance purposes is feasible.
17-6	Discuss how the loss of the future planned overflow parking area with the construction of the Facility and the movement of the employee parking stalls to the ConRAC Facility will benefit public parking at the Airport.	The proposed ConRAC facility includes the provision of 719 parking places for Airport employees on the 3rd level. The existing Airport employee parking is located in the parking lot across from the passenger terminal, behind the Airport public parking. These dedicated Airport employee parking spaces would be converted to Airport public parking, increasing public parking spaces. A parking study for employee and public parking at Kahului Airport was conducted as part of the Site Selection Study for the ConRAC facility. Taking into account the Airport Master Plan forecast, the Federal Aviation Administration Terminal Area Forecast, and demand elasticity associated with the neighbor island market, the study determined that over 700 parking stalls would be needed over the planning horizon. The design of the ConRAC facility accounted for this future parking stall demand on the top level of the facility. When demand for public parking stalls materializes, the existing employee parking (currently located on the makai side of the surface lot fronting the terminal) will be relocated to the top level of the ConRAC facility to allow public parking to expand within the existing surface lot fronting the terminal.
17-7	Recommended that in designing the facility, DOT consider the operations and maintenance for the Facility to ensure that it can be easily maintained.	The operation and maintenance of the proposed ConRAC facility would be the responsibility of the rental car companies utilizing the facility. In most cases, when rental car companies share a consolidated facility, a third-party contractor is obtained by the rental car companies to maintain and keep the facility operating. The proposed ConRAC facility is being designed to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which should reduce operation and maintenance costs. The cost to operate and maintain the proposed ConRAC facility is being considered during design of the facility.

COMMENT #	COMMENT SUMMARY	RESPONSE
17-8	Requested further clarification of Alternative Site No. 4 and No. 5 in regards to possible future expansion plans for the terminal building, runway, or new roads in the airport area. Also include consultation with State and Federal agencies, if applicable, for future terminal and public parking facilities plans at the Airport.	Chapter 2, Alternatives, discusses the evaluation of each of the consolidated rental car facility site alternatives. As noted in Chapter 2 of the Draft EA, both Alternative Sites 4 and 5 met the Purpose and Need criteria, but Alternative Site 5 was selected as the Proposed Action, which is also the rental car companies preferred alternative. Alternative Site 5 is located closer to the passenger terminal and the existing rental car baseyards which would continue to function as heavy maintenance, overflow parking, and administrative areas for the rental car companies. Thus, due to the proximity of Alternative Site 5 to the passenger terminal and existing rental car company baseyards, it would result in less operational costs to the rental car companies than Alternative Site 4. Additionally, Alternative Site 4 is designated in the Wailuku-Kahului Community Plan as "Agricultural", which would require a change to the plan, and a State Special use permit or a State Land Use District Boundary Amendment which would add at a minimum, 18 months to the process. However the site is located out of the SMA area and thus, no SMA Use Permit would be required. The location of this alternative site would complicate the Airport Access Road system and require rental car shuttles to circulate through the terminal roadway system. After additional review of the screening criteria contained in Chapter 2 of the Draft EA, HDOT-A determined that Alternative Site 4 did not meet all components of Criteria 3. The overall customer experience is a combination of the three features of travel time, walking distance, and wayfinding. Because Alternative Site 4 does not meet the component for travel times or walking distances because of its distance to the passenger terminal, Alternative Site 4 was eliminated from further consideration in the Final EA. HDOT-A is preparing a Master Plan Update for Kahului Airport, which identifies future facility requirements, including terminal and public parking facility needs. The proposed ConRAC facility, including provision of employee parking on the top level of the ConRAC facility, is consistent with the Master Plan Update.
17-9	Additional discussion on how runoff will be handled on-site or off-site.	The excerpt below is the conclusion from the executive summary of the drainage report prepared for this project: "The existing peak storm water runoff is 67.64 cubic feet per second (cfs) and the proposed peak storm water runoff is 140.09 cfs. The Proposed Action would increase the storm water flow by 72.45 cfs during the 50-year 1-hour storm. On-site generated storm water would be collected into detention basins and discharged at a controlled rate into the existing drainage system. Therefore, there would be no adverse drainage impacts to the surrounding areas or the existing drainage system." This language has been added to Section 4.7.2.

COMMENT #	COMMENT SUMMARY	RESPONSE
17-10	Commented that DOT should consider the use of efficient fixtures (lighting and water fixtures) and installation of security cameras in the ConRAC Facility.	As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.
AL-07	**Glenn T. Correa, Director of Parks & Recreation** **Department of Parks & Recreation**	
26-1	The Department of Parks & Recreation is in support of the project. We look forward to reviewing the Environmental Assessment when it is available.	Comment noted. The Draft EA was submitted to the Department on March 8, 2013 for review.
AL-08	**Joeseph Pontanilla** **County Council, County of Maui**	
27-1	Thank you for the opportunity to provide comments for the proposed Roadway Improvements and ConRac Facility, Kahului Airport, State Project No. AM1032-13. After review of the information presented, I have no comments at this time.	Comment noted.
AL-09	**Kyle K. Ginoza, P.E., Director of Environmental Management** **County of Maui, Department of Environmental Management**	
28-1	Include a plan for construction waste.	Section 4.18.4, "Solid and Hazardous Waste", discusses waste generated during construction and how waste would be disposed. As stated in the Draft EA, construction and demolition activities would result in a temporary increase in solid waste generation at the Airport. However, recycling, salvage, reuse, and disposal options would be identified in a Solid Waste Management Plan in advance of all activities to minimize the amount of debris directed to local landfills. This plan would include the identification of locations for sorting materials for reuse and recycling. Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. HDOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which would include reuse and recycling of materials.
28-2	Although wastewater system capacity is currently available as of 8/15/2012, the developer should be informed that wastewater system capacity cannot be ensured until the issuance of the building permit.	Comment noted. As discussed in Section 4.7, "Water Quality", of the EA, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location; thus, water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, HDOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.

COMMENT #	COMMENT SUMMARY	RESPONSE
28-3	Wastewater contribution calculations are required before building permit is issued.	As discussed in Section 4.7, "Water Quality", of the EA, water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. Also, HDOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.
28-4	Developer shall pay assessment fees for treatment plant expansion costs in accordance with ordinance setting forth such fees. The property is located in the Kahului Sewer Service Area.	As discussed in the response to Comment 28-2 and Comment 28-3, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location.
28-5	Developer is required to fund any necessary off-site improvements to collection system and wastewater pump stations.	As discussed in the response to Comment 28-2, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location.
28-6	Indicate on the plans the ownership of each easement (in favor of which party). Note: County will not accept sewer easements that traverse private property.	The proposed ConRAC facility would tie into existing sewer lines on Airport property. No easements would be required.
28-7	Kitchen facilities within the proposed project shall comply with pretreatment requirements (including grease interceptors, sample boxes, screens etc.).	Comment noted. If any kitchen facilities are constructed within the proposed ConRAC facility, they would comply with the County of Maui pretreatment requirements.
28-8	Non-contact cooling water and condensate should not drain to the wastewater system.	Comment noted. If any non-contact cooling water and/or condensate is generated by the proposed ConRAC facility it would be separated from the wastewater system.
28-9	The existing and proposed wastewater system in the Kahului Airport area shall remain privately owned and maintained.	Comment noted. The proposed ConRAC facility would tie into existing sewer lines on Airport property. No changes to the wastewater system would be required.
AL-10	**David C. Goode, County of Maui Department of Public Works**	
29-1	We reviewed the subject application and have no comments at this time, but wish to hold our comments until review of the Draft Environmental Assessment.	Comment noted. The Draft EA was submitted to the Department on March 1, 2013 (as part of the SMA application) for review.
AL-11	**Clyde Almeida, County of Maui Housing Division**	
30-1	The Department has reviewed the preparation of an Environmental Assessment (EA) for the above subject project. Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. At the present time, the Department has no additional comments to offer.	Comment noted.
AL-12	**Paul Fasi County of Maui Department of Planning**	
31-1	At this time, the Planning Dept. has no comment. The Dept. would like to thank you for the opportunity to comment. Please call me at 808-270-7814 or respond to this email if you need further clarification.	Comment noted.

COMMENT #	COMMENT SUMMARY	RESPONSE
PC-01	**Isaac Davis Hall Attorney at Law**	
	This comment letter is submitted on behalf of nearby residents and stakeholders who are adversely affected by aircraft noise generated through the operation of the Kahului Airport. The extension of Runway 5-23 to 7,000 feet and its use by larger, noisier aircraft will impose even more severe adverse noise impacts upon these residents. Numerous letters have already been sent on behalf of these residents to HDOT-A, the FAA, Hawaiian Airlines and Aloha Air Cargo objecting to any extension of Runway 5-23 and its use by aircraft that would increase adverse noise impacts.	The Proposed Action analyzed in this EA is the development and operation of a consolidated rental car facility at Kahului Airport. The consolidated rental car facility would have no effect on the number or type of aircraft operations at the Airport and would not change the runway or airfield configuration. Thus, as stated in Section 4.1 of the EA, no change in aircraft noise would arise from development and operation of a consolidated rental car facility at Kahului Airport.
14-1		The Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 to 7,000 feet is only one of the alternatives the HDOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. However, alternatives to this project are still under study; despite what previous statements may have been made concerning the extension of Runway 5-23, there is no decision on a Runway 5-23 extension at this time. The project would be subject to environmental review under HRS 343 and the National Environmental Policy Act at such time that HDOT-A and FAA agree that the planning required to identify and analyze feasible alternatives to the reconstruction of Runway 2-20 is sufficient to proceed.
	The closing of existing Rent-A-Car facilities and their relocation to a new ConRAC facility is necessitated by the planned extension of Runway 5-23 to 7,000 feet.	Initial planning for the proposed ConRAC facility began in 2008 as part of the Statewide Car Rental Facilities Development Study conducted for Hawaii's major airports. Data collection, preliminary facility requirements, high-level concepts, and rough order-of-magnitude costs estimates were developed in 2009 and 2010 to determine financial feasibility. As part of the Statewide program, a site selection study conducted in 2011 identified potential feasible sites at Kahului Airport. Based on the current rental car facility requirements, growth in passenger enplanements and rental car demand, and projected future rental car facility requirements at Kahului Airport, HDOT-A determined that implementation of a ConRAC facility at the Airport should proceed.
14-2		The EA identifies the purpose and need for the Proposed Action. The purpose of the Proposed Acton is to provide the necessary space for the on-Airport rental car companies to accommodate ready/return and quick turnaround facilities in a single location at the airport. The need for the proposed project is based on: 1) Providing adequate on-airport facilities for the rental car companies 2) Reducing traffic and congestion on the terminal roadway system 3) Enhancing the overall customer experience The Proposed Action would result in the consolidation of most rental car operations into the ConRAC; however, the existing rental car facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the rental car facilities currently operate.

COMMENT #	COMMENT SUMMARY	RESPONSE
		The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport. Also, as described in the response to Comment 14-1, the Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 is only one of the alternatives the HDOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. Alternatives to this project are still under study.
4-3	These are "connected" actions the impacts of which must be addressed as a single action, as a matter of law. Because the DEA fails to address these as connected actions the DEA is inadequate. A full Environmental Impact Statement ("EIS") must be prepared now addressing the cumulative and long term impacts of the proposed lengthening of Runway 5-23 to 7,000 feet as it necessitates the closing of existing Rent-A-Car facilities and their relocation to a new ConRAC facility.	FAA Order 5050.4B[1] defines connected actions as follows: (1) Connected actions. These are actions that are closely related to the proposed action and should be discussed in the same EIS. These actions: (a) May automatically trigger other actions requiring EAs or EIS. (b) Cannot or will not occur unless other actions occur at the same time or earlier, and (c) Are independent parts of a large action but depend on the larger action for justification. As indicated in Response 14-2, the proposed project would result in the consolidation of most rental car operations into the ConRAC; however, the existing rental car facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the rental car facilities currently operate. The Proposed Action would not trigger other actions that are not already identified and discussed in the EA and it is not dependent on other actions occurring at the same time or earlier. The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport. FAA Order 5050.4B states that "For purposes of this Order, a project has independent utility when the project has

1 U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions, April 28, 2006, Paragraph 905.c.1.

COMMENT #	COMMENT SUMMARY	RESPONSE
		logical starting and end points and would have a useful purpose without relying on other transportation improvements."[2] Thus, the Proposed Action has independent utility from any potential runway improvements at Kahului Airport. Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.
14-4	The purpose of the proposed ConRAC Facility at the Kahului Airport is purportedly to provide the necessary space for the on-Airport rental car companies to accommodate the ready/return service and quick turnaround (QTA) facilities in a single location on the Airport. Excess rental car storage, dealer preparation, and heavy maintenance is proposed to continue to be accommodated at the existing rental car facility locations on the Airport. The proposed ConRAC will allegedly provide adequate on-Airport facilities for the rental car companies, reduce traffic and congestion on the terminal roadway system and enhance the overall customer experience at the Kahului Airport. The construction of the new ConRAC facility and its related improvements are proposed to be located on approximately 17 acres of land at the Kahului Airport. The ConRAC facility is proposed to include approximately 4,200 parking stalls for rental car use, as well as a quick turnaround area, office, customer service area, and fueling and car wash areas for the various rental car operators.	Comment noted. The Purpose and Need for the Proposed Action are described in Chapter 1 of the EA.
14-5	The purpose of a DEA is to determine, in a short document, whether or not a proposed project "may" have a significant effect on the environment. If the project "may" have a significant effect on the environment a full Environmental Impact Statement ("EIS") "shall" be prepared. HRS § 343-5(b)(1)(D) states that: "A statement **shall** be required if the agency finds that the proposed action **may** have a significant effect on the environment." ("Emphasis added"). In such circumstances the entry of a FONSI is unlawful. Under these circumstances, a full EIS is required by law.	Comment noted. Chapter 4 of the EA identifies the potential effects of the Proposed Action and reasonable alternatives, as required by HRS § 343 and the National Environmental Policy Act. Chapter 5.2 of the EA contains a significance criteria assessment for the Proposed Action, as required by HRS § 343. The HDOT-A is anticipating finding that the Proposed Action will not have a significant effect on the environment based on the findings and reasons set forth in the EA. HAR Section 11-200-10 provides that the agency (anticipated) determination and the findings and reasons supporting the (anticipated) determination be included in the EA.

2 U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions, April 28, 2006, Paragraph 202.c.(4)(a).

COMMENT #	COMMENT SUMMARY	RESPONSE
14-6	The DEA reviews the ConRAC facility as a separate project, in isolation from other interrelated airport projects and thus commits illegal segmentation and "piecemealing" in an attempt to mask the full nature of this project. The DEA discusses the ConRAC facility only within the context of existing Kahului Airport facilities. The DEA entirely ignores all substantive discussion and analysis of the Kahului Master Plan Update (March 2012) ("the Update") that HDOT-A is currently conducting. The Update is available on HDOT's website.[1] [1] http://kahuluiairport.rmtowill.com/wp-content/uploads/2012/03/KAHULUI_AIRPORT_MASTER_PLAN_AND_NCP_Mar_13_2012.pdf.	As previously noted in response to Comments 14-2 and 14-3, the ConRAC facility would meet the stated purpose and need outlined in the EA document and is not dependent on the extension of Runway 5-23 or other projects to meet said objectives. The Kahului Airport Master Plan Update referenced in the letter has not been completed. The document the commentator is referring to is a public presentation that was given by HDOT-A as part of the Master Plan Update process to solicit comments and input on the projects being considered as part of the Master Plan Update Study. Although the presentation refers to a Preferred Plan that includes extension of Runway 5-23, relocation of the rental car facilities, relocation of the commuter terminal, terminal expansion to the north, Lanui (Loop Road) reconfiguration, expansion of public and employee parking, expanded security road network, etc., the Master Plan Update for Kahului Airport has not been completed and a final recommended plan has not been agreed upon by HDOT-A nor presented to FAA. Additionally, the presentation identifies potential improvements for implementation between 2015 and 2035; the timing of the different projects will depend on demand, funding, and obtaining the necessary environmental and FAA approvals.
14-7	The Update presents HDOT-Airport's "Preferred Plan." Among the proposed Master Plan projects to be implemented in the 2015 through 2035 time frame are (1) extending Runway 5-23 to 7,000 feet and (2) closing existing Rent-A-Car facilities and constructing the new ConRAC facility. The Update shows the extended Runway 5-23 superimposed on top of a large portion of the existing Rent-A-Car facilities. The Runway 5-23 extension also brings with it the relocation of the commuter terminal and commuter parking area where Rent-A-Car Facilities now exist. The Rent-A-Car facilities must be relocated if Runway 5-23 is to be lengthened. See the "Preferred Plan" in the Update.	See response to Comments 14-2 and 14-6. As noted in the response to Comment 14-2, the existing rental car facilities would be maintained for heavy maintenance, overflow storage and administrative functions. The Proposed Action does not include demolition, relocation, or removal of these functions from the existing areas.
14-8	The extension of Runway 5-23 to 7,000 feet necessitates the closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility. The closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility are "necessary precedents" for a larger project, the extension of Runway 5-23 to 7,000 feet. The closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility are "phases or increments" of a larger total undertaking, the extension of Runway 5-23 to 7,000 feet. The DEA does not discuss ConRAC as it relates to the Update or, in particular, to any plan to extend Runway 5-23. Section 3 .11 is included in the DEA purportedly to describe "reasonably foreseeable future actions." Again, the DEA neglects to mention the Preferred Plan of extending Runway 5-23 to 7,000 feet and hence neglects to address the cumulative and long-term impacts resulting from this proposed action. There is absolutely no discussion in the DEA about how these are "connected" actions.	At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway 5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Because removal of the existing rental car facilities is not part of the Proposed Action nor is it required for the implementation of the Proposed Action, those actions are properly not analyzed in this EA. Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

COMMENT #	COMMENT SUMMARY	RESPONSE
14-9	HDOT -A agrees that an EIS is required by law to review and analyze the environmental impacts of all of the projects proposed in the Update in order to assess their long term and cumulative impacts. The DEA for the ConRAC facility is inadequate because it fails to analyze the environmental impacts of the proposed ConRAC facility within the context of the other projects proposed in the Preferred Plan presented in the Update.	Each project that HDOT-A proposes to implement at Kahului Airport will need to undergo environmental review and analysis in compliance with HRS § 343 and the National Environmental Policy Act. As stated in the response to Comment 14-3, the proposed ConRAC facility project is a project that has independent utility; it does not depend on other projects for implementation.
14-10	Hawaii's "Environmental Impact Statement Rules" include §11-200-7 entitled "Multiple or Phased Applicant or Agency Actions" which provides as follows: A group of actions proposed by an agency or an applicant shall be treated as a single action when: A. The component actions are phases or increments of a larger total undertaking; B. An individual project is a necessary precedent for a larger project; C. An individual project represents a commitment to a larger project; Or D. The actions in question are essentially identical and a single statement will adequately address the impacts of each individual action and those of the group of actions as a whole. In Sierra Club v. Department of Transportation of the State of Hawai'i ("Sierra Club I"), 115 Haw. 299, 167 P.3d 292 (2007) the Hawaii Supreme Court explained the purpose of this Rule: Rules like HAR § 11-200-7 are meant to keep applicants or agencies from escaping full environmental review by pursuing projects in a piecemeal fashion. See Guidebook at 19 ("The proposed action must be described in its entirety and cannot be broken up into component parts which, if each is taken separately, may have minimal impact on the environment. Segmenting a project in this incremental way to avoid the preparation of an environmental impact statement is against the law."); Kenneth A. Manaster & Daniel P. Selmi, 2 State Environmental Law § 13.10 (2006) (discussing the problem "of segmentation" or "piecemealing" of projects, including "situations in which the agency tries to mask the full nature of its project or divides up what is clearly a larger action into smaller pieces that will be implemented simultaneously," "where a private applicant plainly has definite plans for additional, related projects in the future," or where "a project unquestionably will give rise to later, secondary actions by other individuals [.]"). This DEA is based upon illegal segmentation and piecemealing to avoid the preparation of an EIS and by attempting to mask the full nature of its project.	As stated in the responses to Comments 14-2 and 14-3, the purpose and need for the ConRAC facility are defined and are not dependent on any other project. Additionally, as described in the response to Comment 14-6, the Kahului Airport Master Plan Update has not been completed, no decision has been made on a Runway 5-23 extension, and the Proposed Action is proposed regardless of whether Runway 5-23 is extended. The Proposed Action would result in the consolidation of most rental car operations into the ConRAC facility; however, the existing rental car area and facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the existing rental car facilities operate. There will still be rental car facilities in place after the Proposed Action that a Runway 5-23 extension would have to take into account at the time any such extension is proposed and reviewed. The Proposed Action would not trigger other actions that are not already identified and discussed in the EA and it is not dependent on other actions occurring at the same time or earlier. The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway 5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Because removal of the existing rental car facilities is not part of the Proposed Action nor is it required for the implementation of the Proposed Action, those actions are properly not analyzed in this EA.

COMMENT #	COMMENT SUMMARY	RESPONSE
14-11	The duty to study "secondary impacts" is also addressed in Sierra Club v. Department of Transportation of the State of Hawai'i ("Sierra Club I"), 115 Haw. 299, 167 P.3d 292 (2007). The Hawaii Supreme Court relied upon McGlone v. Inaba, 64 Haw. 27, 636 P.2d 158 (1981), and Ocean Advocates v. U.S. Army Corps of Engineers, 402 F.3d 846 (9th Cir.2005). The Hawaii Supreme Court ruled: *McGlone* makes clear that in making this determination, the agency must consider not just the effect of an action on the direct site to which the exemption applies (the "primary impact"), but also secondary impacts that are "incident to and a consequence of the primary impact." This DEA fails to study secondary impacts as well. The proposal to extend Runway 5-23 to 7,000 feet necessitates the closing and relocation of the existing Rent-A-Car facilities. The impacts of both projects must be addressed at the same time. The DEA improperly has limited its scope to the primary impacts of the ConRAC facility alone.	See responses to Comments 14-2, 14-3, and 14-6. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway 5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Those effects would be true secondary impacts, and would be analyzed as such in the appropriate environmental document. The extension of Runway 5-23 is not incident to or a consequence of the Proposed Action. Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.
14-12	The DEA includes a "no action" alternative - described as "no changes to the existing rental car facilities at OGG would be implemented." See § 2.3.2.1. The necessity to relocate these facilities if Runway 5-23 is lengthened to 7,000 feet is never mentioned. Any "hard look" at the "no action" alternative would need to include an acknowledgment that the existing Rent-A-Car facilities must be closed and relocated if Runway 5-23 is to be extended to 7,000 feet. NEPA and HEPA [HRS 343] require that alternatives - including the no action alternative – be given full and meaningful consideration. Bob Marshall Alliance v. Hodel, 852 F. 2d 1223 (9th Cir.1988). This "no action" alternative is meaningless without a full description of this alternative.	See responses to Comments 14-2, 14-3, and 14-6. The Council on Environmental Quality (CEQ) states "The No Action alternative would mean the proposed activity would not take place, and the resulting environmental effects from taking no action would be compared with the effects of permitting the proposed activity or an alternative activity to go forward." The No Action alternative includes all approved projects (i.e., those actions that are reasonably foreseeable as being implemented). Because the extension of Runway 5-23 has not been approved at the federal, State, or local level, it is not a reasonably foreseeable project that should be included as part of the No Action alternative. Rather it is a project that may occur in the future, if the appropriate federal, State, and local environmental reviews are undertaken and approvals obtained. Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

COMMENT #	COMMENT SUMMARY	RESPONSE
14-13	G. IMPACTS THAT THE DEA FAILS TO ADDRESS 1. Adverse Aircraft Noise Impacts Imposed Upon Kahului Residents In extending Runway 5-23 to 7,000 feet, HDOT-A has stated that the runway will then be available for use by larger, noisier aircraft. The increase in severe adverse noise impacts that this extension will impose upon Kahului residents have not been studied and must be addressed and mitigated first. 2. Adverse Aircraft Noise Impacts Imposed Upon Spreckelsville Residents The extension of Runway 5-23 to 7,000 feet will also impose greater adverse noise impacts upon Spreckelsville residents. These impacts have not been studied and must be addressed and mitigated first. 3. Adverse Impacts Imposed Upon Kanaha Wildlife Sanctuary The proposed extension of Runway 5-23 to 7,000 feet will, in part, be in the direction of the Kanaha Wildlife Sanctuary thereby increasing adverse aircraft noise impacts upon the wildlife protected by this Sanctuary. These impacts have not been studied and must be addressed and mitigated first. 4. Adverse Impacts on Recreational Users of Kanaha Beach Park In extending Runway 5-23 to 7,000 feet, HDOT-A has stated that the runway will then be available for use by larger, noisier aircraft. Runway 5-23 is adjacent to Kanaha Beach Park. The increase in adverse noise impacts that this extension will impose upon users of Kanaha Beach Park and to recreational uses facilitated by the Park have not been studied and must be addressed and mitigated first.	See response to Comment 14-6. The extension of Runway 5-23 is not part of the Proposed Action. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives.
14-14	The Environmental Council has promulgated regulations on when proposed actions "may" have a significant effect on the environment. HAR 11-200-9 through 13, Subchapter 6, entitled "Determination of Significance." This Subchapter contains HAR § 11-200-12, entitled "Significance Criteria." An agency is required to consider" .... the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action .... [and) .... every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action." HAR § 11-200-12.A and B. In addition, as is pertinent, according to HAR § 11-200-12.B., in most instances, an action shall be determined to have a significant effect on the environment if it: 1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resource; 2. Curtails the range of beneficial uses of the environment; 3. Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders; 4. Substantially affects the economic welfare, social welfare, and cultural practices of the community or State; 5. Substantially affects public health; 6. Involves substantial secondary impacts, such as population changes or	A Significance Criteria Assessment in compliance with HRS § 343 is included in Section 5.2.

COMMENT #	COMMENT SUMMARY	RESPONSE
	effects on public facilities; 7. Involves a substantial degradation of environmental quality; 8. Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions; 9. Substantially affects a rare, threatened, or endangered species, or its habitat; 10. Detrimentally affects air or water quality or ambient noise levels; 11. Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, freshwater, or coastal waters.	
14-15	First, the "Significance Criteria" plainly mandate that HDOT-A is required to consider" .... the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action .... [and) .... every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action." HAR § 11-200-12.A and B. The DEA fails to do this.	A Significance Criteria Assessment in compliance with HRS § 343 is included in Section 5.2.
14-16	Second, the "Significance Criteria" require that "connected" actions be addressed. The DEA has failed to address the impacts resulting from the extension of Runway 5-23 to 7,000 feet, a clear connected action.	As stated in the responses to Comments 14-2, 14-3 and 14-6, the extension of Runway 5-23 is not a connected action to the Proposed Action.
14-17	Third, once it is acknowledged that the proposed extension of Runway 5-23 to 7,000 feet is a connected action that must be addressed, there are multiple other "Significance Criteria" that are then in play that are not addressed in the DEA.	See response to Comments 14-2, 14-3, 14-6, and 14-16. The extension of Runway 5-23 to 7,000 feet is one option HDOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. However, alternatives to this project are still under study. The project would be subject to environmental review under HRS 343 and the National Environmental Policy Act at such time that HDOT-A and FAA agree that the planning required to identify and analyze feasible alternatives for the reconstruction of Runway 2-20 is sufficient to proceed.
14-18	The DEA for the proposed ConRAC facility is inadequate as a matter of law and fact. Either HDOT-A must state in writing that it has abandoned its proposed project to lengthen Runway 5-23 to 7,000 feet or a full EIS must be prepared now addressing the environmental impacts of all connected actions together.	See response to Comments 14-2, 14-3, 14-6, and 14-16.
PC-02	**Tom Hutchison, OSP Engineer Hawaiian Telcom, Inc.**	
15-1	Hawaiian Telcom, Inc. has no comment, nor do we require any additional information at this time.	Comment noted.
PC-03	**Tom Hutchison, OSP Engineer Hawaiian Telcom, Inc.**	
32-1	Hawaiian Telcom, Inc. has no comment, nor do we require any additional information at this time.	Comment noted.

COMMENT #	COMMENT SUMMARY	RESPONSE
PC-04	**Ray Okazaki, Supervisor, Engineering Maui Electric Company, Ltd.**	
33-1	In reviewing our records and the information received, Maui Electric Company (MECO), we highly encourage the customer's electrical consultant to submit the electrical demand requirements and project time schedule as soon as practical so that we can properly evaluate the impact to our facilities and provide service on a timely basis. In addition, we highly encourage the customer to contact Steven Rymsha at 872-3292 of our Renewable Energy Department for any interconnection requirements as necessary to accommodate the customer's photovoltaic (PV) system.	Comment noted. HDOT-A will coordinate electrical demands for the project as the design for the proposed ConRAC facility progresses.

7. List of Preparers

The following individuals prepared the EA. Information provided includes the organizations for which each individual works, a brief synopsis of their relative experience and qualifications, and their responsibilities in the preparation of this EA document.

7.1 Principal Federal Aviation Administration Reviewers

Gordon Wong, Program Manager, Hawaii Airports District Office

FAA project manager responsible for detailed evaluation and coordination of the FAA review of the Environmental Assessment with federal and State agencies.

David B. Kessler, AICP, Regional Environmental Protection Specialist, Airports Division, Western-Pacific Region

Qualifications – M.A. Physical Geography B.A., Physical Geography (Geology Minor). Mr. Kessler has 33 years of experience. Principal FAA Planner/Environmental Protection Specialist responsible for detailed FAA evaluation of Environmental Assessments and Environmental Impact Statements as well as coordination of comments from federal and state agencies in the FAA's Western-Pacific Region. Responsibilities – Detailed evaluation and review of document for compliance with National Environmental Policy Act.

7.2 State of Hawaii Department of Transportation, Airports Division

Kimberly Evans, Head Planner

Review and coordination with FAA Honolulu Airports District Office and FAA Western Pacific Regional Division.

Lynette Kawaoka, Planner

Review and coordination.

Gene Matsushige, Head Construction Engineer

Overall review and coordination with FAA Honolulu Airports District Office and FAA Western Pacific Regional Division.

Marvin Moniz, Airport District Manager

Review and coordination.

Kevin Funasaki (Bowers + Kubota Consulting), Project Manager

Sponsor's contracting project manager responsible for project management and coordination for HDOT-A.

7.3 Ricondo & Associates, Inc.

John C. Williams, Senior Vice President

- Qualifications – Over 29 years of experience in airport environmental and physical planning, with significant experience in preparing and managing environmental assessments and environmental impact statements, airport noise compatibility planning projects, airport master planning projects, and airfield and airspace analyses.
- Responsibilities – Overall quality control and NEPA guidance.

Stephen D. Culberson, Director

- Qualifications – Over 20 years of experience in airport environmental and planning studies, with significant experience in preparing and managing environmental assessments and environmental impact statements, airport master planning projects, and activity forecasts.
- Responsibilities – Project management, NEPA documentation, purpose and need, alternatives, affected environment, and environmental consequences.

Ura Quoniou, Director

- Qualifications – Ten years of experience in airport planning, operations, and airspace.
- Responsibilities – Purpose and need, alternatives, and coordination with design firm.

Jason M. Apt, Managing Consultant

- Qualifications – Over 8 years of airport and environmental planning experience, primarily in conducting air quality and land use compatibility analyses.
- Responsibilities – Air quality assessment and analyses.

Glenn Warren,P.E., Senior Consultant

- Qualifications – Over 8 years of airport and environmental planning experience, primarily in conducting air quality and land use compatibility analyses.
- Responsibilities – Traffic assessment and analyses.

Marine Ladner, Consultant

- Qualifications – Three years of experience in airport planning, navaids, and airspace.
- Responsibilities – NEPA documentation, purpose and need, and alternatives.

Brian Philiben, Consultant

- Qualifications – Over 5 years of environmental consulting, with particular expertise in land-use planning.
- Responsibilities – Responsible for managing documentation and project records.

Casey Venzon, Consultant

- Qualifications – Over 5 years of airport environmental and sustainability consulting experience, with particular expertise in preparing NEPA documentation and airport sustainability analyses.
- Responsibilities – Responsible for addressing comments and documentation.

7.4 Munekiyo & Hiraga, Inc.

Karlynn K. Fukuda, Principal

- Qualifications – 10 years of experience in environmental and planning studies, with significant experience in preparing and managing environmental assessments, Special Management Area Use Permits and other State and County regulatory permitting, as well as community and government relations.
- Responsibilities – Project management, assistance with preparation of Chapter 343, Hawaii Revised Statutes, Environmental Assessment, and Special Management Area Use Permit preparation and processing.

Erin Mukai, Associate

- Qualifications – 5 years of experience in environmental and planning studies, with experience in preparing and managing environmental assessments and Special Management Area Use Permits and other State and County regulatory permitting.
- Responsibilities – Project research and assistance with preparation of Chapter 343, Hawaii Revised Statutes, Environmental Assessment, and Special Management Area Use Permit application.

7.5 Robert Hobdy, Biological Consultant

Robert Hobdy, Biological Consultant

- Qualifications – Over 30 years of experience in flora, faunal, threatened and endangered species surveys, and wetland identification/delineation with the State of Hawaii, Department of Land and Natural Resources, Division of Forestry and Wildlife.
- Responsibilities – Flora and faunal surveys, wetland investigation, biological assessment .

7.6 Scientific Consultant Services, Inc.

Michael Dega, Principal Investigator

- Qualifications – Over 20 years of archaeological experience in the Pacific Basin (Hawaii, Micronesia) and Southeast Asia. Over 500 technical archaeological reports prepared for work in the Hawaiian Islands (archaeological inventory survey, data recovery, preservation, burial treatment, monitoring). Numerous academic publications and conference presentations on archaeological work in Hawaii and SE Asia.
- Responsibilities – Principle Investigator for archaeological inventory survey, NEPA documentation on historic, archaeological, architectural, and cultural resources.

Cathleen Dagher, Senior Archaeologist

- Qualifications – Over 20 years of experience in Hawaiian archaeology, including over twelve years with the Department of Land and Natural Resources/State Historic Preservation Division.
- Responsibilities – Preparing Cultural Impact Assessment, consulting with Native Hawaiian community members in compliance with the State statutes (Chapter 343), in accordance with the State of Hawai`i Department of Health's Office of Environmental Quality Control (OEQC) Guidelines for Assessing Cultural Impacts, and NEPA.

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9. List of Abbreviations and Acronyms

A

A&B – Alexander and Baldwin Hawaii, Inc.

AC – Advisory Circular

ACCI – Aviation Climate Change Research Initiative

ACRP – Airport Cooperative Research Program

ALP – Airport Layout Plan

AOA – Air Operations Area

APE – Area of Potential Effect

ARFF – Airport Rescue and Fire Fighting

ARP – Airport Reference Point

ASAP – Alien Species Action Plan

B

BA – Biological Assessment

BFE – Base Flood Elevation

BMPs – Best Management Practices

BO – Biological Opinion

C

CAA – Clean Air Act

CAAA – Clean Air Act Amendments of 1990

CEQ – Council on Environmental Quality

CERCLA – Comprehensive Environmental Response, Compensation and Liability Act

CFC - Chlorofluorocarbons

CFR – Code of Federal Regulations

CH_4 - Methane

CO – Carbon Monoxide

CO_2 – Carbon dioxide

ConRAC – Consolidated Rental Car

CSB – Customer Service Building

CWA – Clean Water Act

CWS – Central Water System

CZM – Coastal Zone Management

CZMA – Coastal Zone Management Act

CZMP – Coastal Zone Management Program

D

DAGS – Department of Accounting and General Services

dB – decibel

dBA – A-weighted decibel

DLNR – Department of Land and Natural Resources

DNL – Day-Night Average Sound Level

DOH – Department of Health

DOT – U.S. Department of Transportation

E

EA – Environmental Assessment

EIS – Environmental Impact Statement

ESA – Endangered Species Act

F

FAA – Federal Aviation Administration

FEMA – Federal Emergency Management Agency

FIRMs – Flood Insurance Rate Maps

FPPA – Farmland Protection Policy Act

G

GAO – General Accounting Office

GHGs – Greenhouse Gases

H

H_2O – Water

HAR – Hawaii Administrative Rules

HC – Hydrocarbon

HC&S – Hawaiian Commercial & Sugar Company

HCFS - Hydrochlorofluorocarbons

HDOT – Hawaii Department of Transportation

HDOT-A – Hawaii Department of Transportation - Airports Division

HEER - Hazard Evaluation and Emergency Response

HEPA – Hawaii Environmental Protection Act

HRS – Hawaii Revised Statutes

HSWA – Hazardous and Solid Waste Amendments of 1984

I

IAL – Important Agricultural Lands

IBC – International Building Code

IPCC – Intergovernmental Panel on Climate Change

K

KPWS – Kanahā Pond Wildlife Sanctuary

L

L&WCF – Land & Water Conservation Fund

LNG – Liquefied Natural Gas

LOMR – Letter of Map Revision

LOS – Level of Service

M

MCC – Maui County Code

MOU – Memorandum of Understanding

msl – mean sea level

mph – miles per hour

N

n.a. – not available

n/a – not applicable

N_2O – nitrous oxide

NAAQS – National Ambient Air Quality Standards

NASA – National Aeronautics and Space Administration

NEPA – National Environmental Policy Act

NHPA – National Historic Preservation Act

NO_2 - Nitrogen Dioxide

NO_X – Oxides of Nitrogen

NOAA – National Oceanic and Atmospheric Administration

NPIAS – National Plan of Integrated Airport Systems

NPL – National Priorities List

NRCS – Natural Resources Conservation Service

NRHP – National Register of Historic Places

O

O_3 – Ozone

OEQC – Office of Environmental Quality Control

OGG – Kahului Airport

P

PARTNER – Partnership for Air Transportation, Noise, and Emissions Reduction

Pb – Lead

PCBs – polychlorinated biphenyls

PM_{10} – Particulate Matter

$PM_{2.5}$ – Fine Particulates

Q

QTA – Quick Turn-Around

R

R/R – Ready/Return

RCRA – Resource Conservation and Recovery Act

ROD – Record of Decision

RPZ – Runway Protection Zone

S

SF_6 – sulfur hexafluoride

SHPD – State Historic Preservation Division

SHPO – State Historic Preservation Officer

SIP – State Implementation Plan

SLUC – State Land Use Commission

SMA – Special Management Area

SO_2 – Sulfur Dioxide

SO_X – Oxides of Sulfur

T

TMK – Tax Map Key

TNW – Traditional Navigable Water

TRB – Transportation Research Board

TSCA – Toxic Substances Control Act of 1976

U

UBC – Uniform Building Code

UPS – United Parcel Service

USACE – U.S. Army Corps of Engineers

U.S.C. – U.S. Code

USDA – U.S. Department of Agriculture

USEPA – U.S. Environmental Protection Agency

USFWS – U.S. Fish and Wildlife Service

USGS – U.S. Geological Survey

USPS – U.S. Postal Service

USTs – underground storage tanks

V

VOCs – Volatile organic compounds

W

WKWWRF – Wailuku-Kahului Wastewater Reclamation Facility

WRF – Wastewater Reclamation Facility

X

Y

Z

Appendix A

Agency Coordination

A. Appendix A – Agency Coordination

Project introduction letters were sent to 42 individuals representing federal, State, and local agencies with jurisdiction over resources either known to be in the vicinity of the Airport or for resources that could potentially be present in the area. Letters were also sent to surrounding communities. The purpose of the letters was to inform agencies and communities about the Environmental Assessment (EA) process, the proposed project, preliminary purpose and need, and preliminary alternatives and to solicit input on issues of concern that they would like addressed in the EA. The list of individuals, agencies, and communities the letter was sent to is provided on the following page. A sample introduction letter follows the mailing list. Agency correspondence received in response to the letter appears at the end of this appendix, as well as coordination letters with the State Historic Preservation Division, Office of Hawaiian Affairs, and U.S. Fish & Wildlife Service.

1.1 Project Introduction Letter Mailing List

Federal Agencies

- Ms. Ganske-Cerizo, Soil Conservationist, Natural Resources Conservation Service, U.S. Department of Agriculture, Kahului, Hawaii
- Mr. Young, Regulatory Branch, U.S. Department of the Army, U.S. Army Engineer District, Honolulu, Fort Shafter, Hawaii
- Mr. Mehrhoff, Field Supervisor, U. S. Fish and Wildlife Service, Honolulu, Hawaii

State Agencies

- Mr. Seki, Comptroller, Department of Accounting and General Services, Honolulu, Hawaii
- Mr. Kokubun, Chair, Department of Agriculture, Honolulu, Hawaii
- Ms. Seddon, Executive Director, Hawaii Housing Finance and Development Corporation, Honolulu, Hawaii
- Mr. Lim, State of Hawaii, Department of Business, Economic Development & Tourism, Honolulu, Hawaii

- Ms. Matayoshi, Superintendent, State of Hawaii, Department of Education, Honolulu, Hawaii
- Ms. Masagatani, Chairman, Department of Hawaiian Home Lands, Honolulu, Hawaii
- Ms. Fuddy, Chairman, State of Hawaii, Department of Health, Honolulu, Hawaii
- Ms. Kitkowski, District Environmental Health Program Chief, State of Hawaii, Department of Health, Wailuku, Hawaii
- Ms. McIntyre, Office Manager, Environmental Planning Office, Department of Health, Honolulu, Hawaii
- Mr. Aila, Jr., Chairperson, State of Hawaii, Department of Land and Natural Resources, Honolulu, Hawaii
- Ms. Aiu, Administrator, State of Hawaii, Department of Land and Natural Resources, State Historic Preservation Division, Kapolei, Hawaii
- Ms. Pickett, Maui Archaeologist, State of Hawaii, Department of Land and Natural Resources, State Historic Preservation Division, Wailuku, Hawaii
- Major Wong, Director, , Hawaii State Civil Defense, Honolulu, Hawaii
- Dr. Crabbe, Chief Executive Officer, , Office of Hawaiian Affairs, Honolulu, Hawaii
- Mr. Souki, Director, State of Hawaii, Office of Planning, Honolulu, Hawaii
- Senator Baker, Senator, Hawaii State Senate, Hawaii State Capitol, Room 210, Honolulu, Hawaii
- Senator English, Senator, Hawaii State Senate, Hawaii State Capitol, Room 205, Honolulu, Hawaii
- Senator Tsutsui, Senator, Hawaii State Senate, Hawaii State Capitol, Room 206, Honolulu, Hawaii
- Representative Fontaine, Representative, House of Representatives, Hawaii State Capitol, Room 311, Honolulu, Hawaii
- Representative Carroll, House of Representatives, Hawaii State Capitol, Room 405, Honolulu, Hawaii
- Representative McKelvey, House of Representatives, Hawaii State Capitol, Room 315, Honolulu, Hawaii
- Representative Keith-Agaran, House of Representatives, Hawaii State Capitol, Room 424, Honolulu, Hawaii
- Representative Souki, House of Representatives, Hawaii State Capitol, Room 433, Honolulu, Hawaii
- Representative Yamashita, House of Representatives, Hawaii State Capitol, Room 402, Honolulu, Hawaii
- Hawaiian Telcom, Wailuku, Hawaii

Local Agencies/Communities

- Mayor Arakawa, County of Maui, Wailuku ,Hawaii
- Chief Murray, Fire Chief, County of Maui, Department of Fire and Public Safety, Kahului, Hawaii

- Ms. Ridao, Director, County of Maui, Department of Housing and Human Concerns, Wailuku, Hawaii
- Mr. Correa, Director, County of Maui, Department of Parks and Recreation, Wailuku, Hawaii
- Mr. Spence, Director, County of Maui, Department of Planning, Wailuku, Hawaii
- Chief Yabuta, Chief, County of Maui, Police Department, Wailuku, Hawaii
- Mr. Goode, Director, County of Maui, Department of Public Works, Wailuku, Hawaii
- Mr. Ginoza, Director, County of Maui, Department of Environmental Management, Wailuku, Hawaii
- Ms. Winer, Director, County of Maui, Department of Transportation, Wailuku, Hawaii
- Mr. Taylor, Director, County of Maui, Department of Water Supply, Wailuku, Hawaii
- Council Chair Mateo, Council Chair, Maui County Council, Wailuku, Hawaii
- Council Vice Chair Pontanilla, Council Vice Chair, Maui County Council, Wailuku, Hawaii
- Mr. Takahata, Manager – Engineering, Maui Electric Company, Ltd., Kahului, Hawaii
- Ms. Reimann, Executive Director, Maui Hotel & Lodging Association, Wailuku, Hawaii

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NEIL ABERCROMBIE
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JADINE URASAKI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:
AIR-EC
12.0279

July 23, 2012

The Honorable Mele Carroll
13th Representative District
State Capitol, Room 405
Honolulu, Hawaii 96813

Dear Representative Carroll:

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport
State Project No. AM1032-13

The State of Hawaii, Department of Transportation, Airports Division (DOTA) has initiated the preparation of an Environmental Assessment (EA) for the construction and operation of a consolidated rental car facility at Kahului Airport (OGG or the Airport). The EA is being prepared to comply with both Federal Aviation Administration (FAA) requirements under the National Environmental Policy Act (NEPA) and State of Hawaii requirements under the Hawaii Environmental Protection Act (HEPA).

The proposed consolidated rental car (ConRAC) facilities include:

- Customer Service Building (CSB) where all rental car counters and administrative offices would be located;
- Ready/Return (R/R) structure (for rental car pick up and return and overflow parking);
- Quick Turnaround Area (QTA) for refueling, light maintenance, and washing of rental vehicles;
- Site landscaping;
- Infrastructure improvements;
- Connections to the terminal roadway system; and
- Flat-plate photovoltaic panels on the roof of the Ready/Return structure.

Kahului Airport is served by seven on-Airport rental car businesses (Alamo, Avis, Budget, DTAG or Dollar Rent A Car, Enterprise, National, and Hertz). The existing rental car facilities at OGG are located northwest of the passenger terminal area and public parking lots (see **Exhibit 1**). With the exception of Enterprise Rent-a-Car customers, all customers returning rental cars

must circulate through the Airport terminal roadway adding traffic congestion to the on-Airport roadways.

Purpose and Need for Project

The purpose of the proposed project is to provide the necessary space for on-Airport rental car companies to accommodate ready/return and quick turn around (QTA) facilities in a single location at the Airport. Excess rental car storage, dealer preparation, and heavy maintenance would continue to occur at the existing rental car facility locations on-Airport.

The needs identified for the proposed project include:

- Providing adequate facilities for rental car companies;
- Reduce traffic and congestion on the terminal roadway system; and
- Enhance customer (passenger) experience.

Alternatives

The process followed to identify the range of initial alternatives to be considered and the screening process used to determine which alternatives would reasonably satisfy the purpose of and need for the proposed project, will be documented in the EA. A range of alternatives, including the No Action alternative, on-site alternatives, and off-site alternatives will be evaluated in the EA being prepared by DOTA. Preliminary analysis indicates that the on-site alternatives will best meet the stated purpose and need for the project. **Exhibit 2** illustrates the on-site alternatives under consideration.

EA Process and Schedule

The DOTA is in the process of developing the EA, and plans to release the draft EA for public and agency review in the fall of 2012. The EA will document the project's purpose and need, the Proposed Action and alternatives to the Proposed Action, the affected environment, and environmental consequences. If you or someone in your organization has any specific concerns with the project, or recommend that a particular issue(s) should be addressed in the EA, we would appreciate a phone call, email, or letter by August 15, 2012, to discuss your concerns.

Please address all comments to Mr. Gene Matsushige, Airports Division, Engineering Branch, at 400 Rodgers Boulevard, Suite 700, Honolulu, Hawaii 96819. If you prefer, the requested information may be emailed to Mr. Gene Matsushige, at gene.matsushige@hawaii.gov, or it may be faxed to (808) 838-8751.

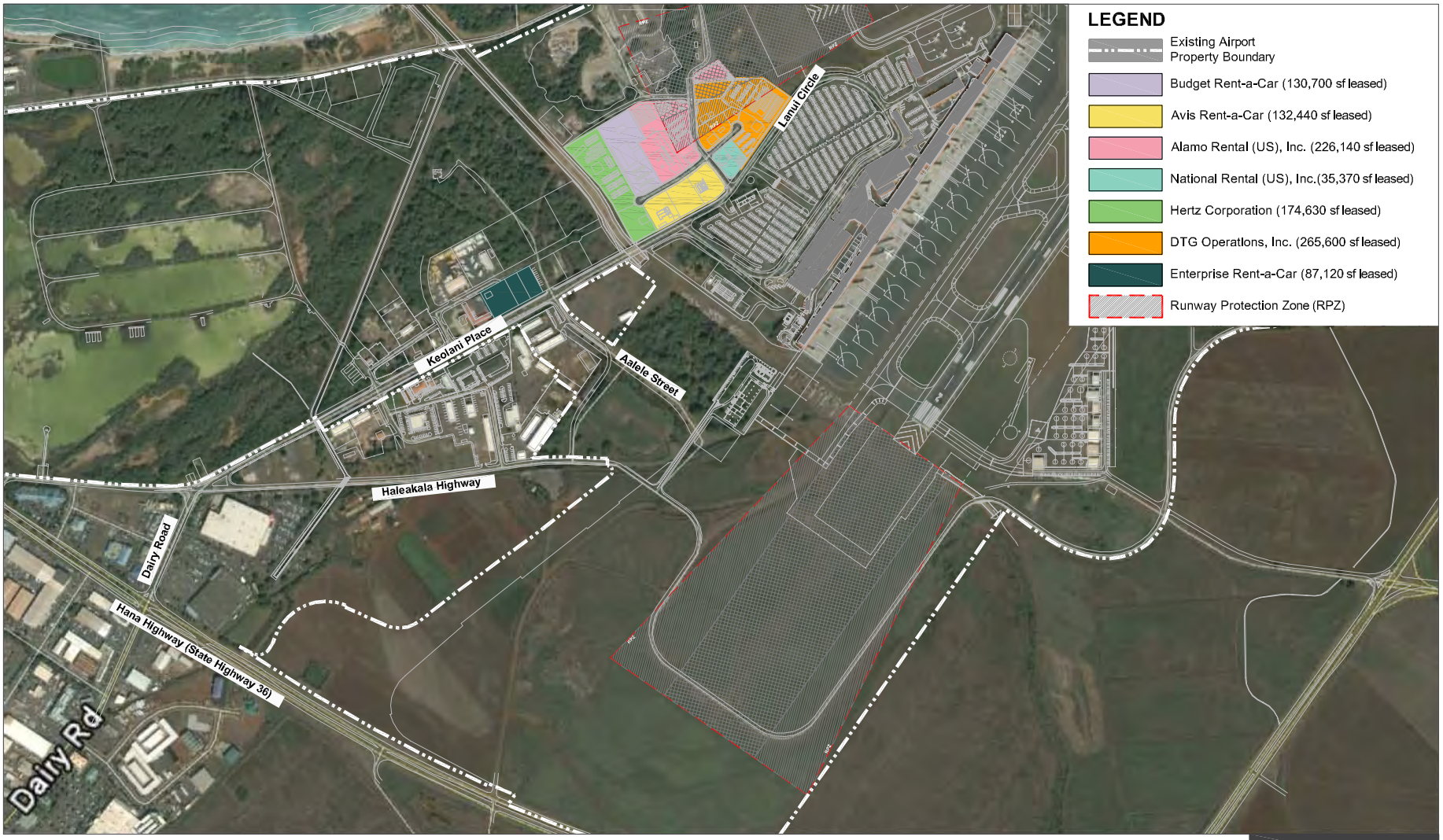
Should you have any questions or concerns, please call Mr. Gene Matsushige, Head Construction Engineer, at (808) 838-8826.

Very truly yours,

GLENN M. OKIMOTO, Ph.D.
Director of Transportation

Enclosures

[Preliminary Draft for Discussion Purposes Only]



SOURCE: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Master Plan, April 19, 2011; Ricondo & Associates, Inc., July 2012.
PREPARED BY: Ricondo & Associates, Inc., July 2012.

EXHIBIT 1

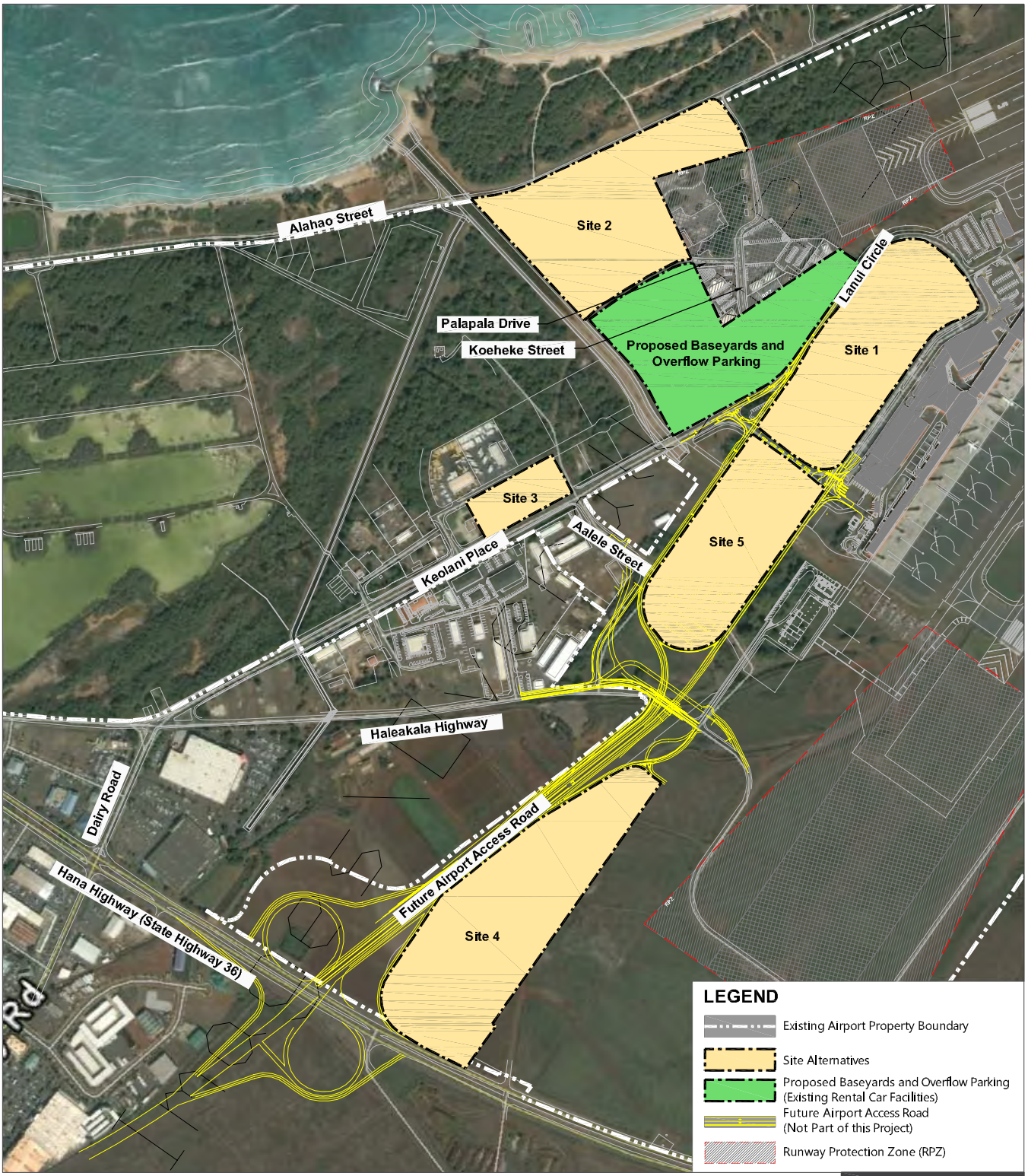
NORTH

0 1,100 ft.

Existing Rental Car Facilities

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 1-2 Existing Rental Car Company Sites.dwg_Layout: Existing Facilities_Jul 13, 2012, 9:30am

[Preliminary Draft for Discussion Purposes Only]



SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Department of Transportation, Airports Division, June 2011 (OGG Base CAD file); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements); Ricondo & Associates, Inc., July 2012.
PREPARED BY: Ricondo & Associates, Inc., July 2012.

EXHIBIT 2

NORTH 0 900 ft.

Alternative Sites 1-5

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 2-1 Potential ConRAC Sites_P.dwg, Layout: 8.5x11P, Jul 13, 2012, 9:38am

LINDA LINGLE
GOVERNOR

KAREN SEDDON
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

IN REPLY REFER TO:

12:PEO/44

August 3, 2012

Mr. Gene Matsushige
Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Re: Roadway Improvements and ConRAC Facility, Kahului Airport
State Project No. AM1032-13

Thank you for seeking our comments on the proposed Roadway Improvements and ConRAC Facility at the Kahului Airport. We have no housing-related comments to offer at this time.

Sincerely,

Karen Seddon
Executive Director

NEIL ABERCROMBIE
GOVERNOR

MAJOR GENERAL DARRYLL D. M. WONG
DIRECTOR OF CIVIL DEFENSE

DOUG MAYNE
VICE DIRECTOR OF CIVIL DEFENSE

PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

August 9, 2012

Mr. Gene Matsushige
Engineering Branch
Airports Division
Department of Transportation
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13

Thank you for the opportunity to comment on this proposed project.

After review of the documents provided for the subject project, we have determined that the proposed project area falls within coverage arcs of existing warning sirens. We anticipate reviewing the Draft Environmental Assessment upon its completion.

If you have any questions please call Ms. Havinne Okamura, Hazard Mitigation Planner, at 733-4300, extension 556.

Sincerely,

EXECUTIVE OFFICER

FOR DOUG MAYNE
Vice Director of Civil Defense

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director

PATRICK T. MATSUI
Deputy Director

(808) 270-7230
FAX (808) 270-7934

DEPARTMENT OF PARKS & RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

August 10, 2012

Mr. Gene Matsushige
State of Hawaii, Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

Dear Mr. Matsushige:

SUBJECT: Roadway Improvements and ConRAC Facility, Kahului Airport, State Project No. AM1032-13, AIR-EC 12.0279

Thank you for the opportunity to review and comment on the subject project.

The Department of Parks & Recreation is in support of the project. We look forward to reviewing the Environmental Assessment when it is available.

Please feel free to contact me or Robert Halvorson, Chief of Planning and Development, at (808) 270-7931, should you have any questions.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning and Development

GTC:RH:ca

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 14, 2012

Department of Transportation
Attention: Mr. Gene Matsushige, Head Construction Engineer
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Matsushige:

SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, the DLNR has no comments to offer on the subject matter. If you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

cc: Central Files

DIR 1198

NEIL ABERCROMBIE
GOVERNOR

DEAN H. SEKI
COMPTROLLER

STATE OF HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAI'I 96810-0119

AUG - 3 2012

(P)1163.2

MEMORANDUM

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
2012 AUG -7 A 11:10

TO: Mr. Gene Matsushige
Airports Division, Engineering Branch
Department of Transportation

FROM: Dean H. Seki
Comptroller

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13
Environmental Assessment (EA), Letter dated July 23, 2012

Thank you for the opportunity to provide comments for the subject project. The proposed location does not impact any of the Department of Accounting and General Service's existing facilities in the area. However alternative site 3, if utilized, is located relatively close to our facilities on Mua Street. If this alternative site is used, it could possibly add additional vehicular traffic along Keolani Place.

We have no other comments to offer at this time.

Once the EA is prepared, please allow us to review the document to ensure that our facilities are not adversely impacted.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Alva Nakamura of the Public Works Division at 586-0488.

c: ✓ Honorable Glenn Okimoto, Ph.D., Dir. DOT

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

12-138
EA Kahului Airport

August 3, 2012

TO: Gene Matsushige
Engineering Branch, Department of Transportation

FROM: Laura McIntyre, Manager
Environmental Planning Office, Department of Health

SUBJECT: Environmental Assessment, Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13
Reference No. AIR-EC 12.0284

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter, dated **July 23, 2012.** Thank you for allowing us to review and comment on the subject document. The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time, but reserve the right to future comments. 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 application should be adhered to.

The United States Environmental Protection Agency provides a wealth of information on their website including strategies to help protect our natural environment and build sustainable communities at: http://water.epa.gov/infrastructure/sustain/ . The DOH encourages State and county planning departments, developers, planners, engineers and other interested parties to apply these strategies and environment principles whenever they plan or review new developments or redevelopments projects. We also ask you to share this information with others to increase community awareness on healthy, sustainable community design. If there are any questions about these comments please contact me by phone at 586-4337 or email: laura.mcintyre@doh.hawaii.gov.

C: Glenn M. Okimoto, Director of Transportation

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

LORRIN W. PANG, M.D., M.P.H.
DISTRICT HEALTH OFFICER

STATE OF HAWAII
DEPARTMENT OF HEALTH
MAUI DISTRICT HEALTH OFFICE
54 HIGH STREET
WAILUKU, HAWAII 96793

August 6, 2012

Mr. Gene Matsushige
Airports Division
Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Subject: Environmental Assessment for Construction and Operation of a Consolidated Rental Car Facility at Kahului Airport
State Project No. AM1032-13

Thank you for the opportunity to review this project. We have the following comments to offer:

1. National Pollutant Discharge Elimination System (NPDES) permit coverage maybe required for this project. The Clean Water Branch should be contacted at 808 586-4309.

2. The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules (HAR), Chapter 11-46, "Community Noise Control." A noise permit may be required and should be obtained before the commencement of work. The Indoor and Radiological Health Branch should be contacted at 808 586-4700.

It is strongly recommended that the Standard Comments found at the Department's website: http://hawaii.gov/health/environmental/env-planning/landuse/landuse.html be reviewed, and any comments specifically applicable to this project should be adhered to.

Should you have any questions, please call me at 808 984-8230 or E-mail me at patricia.kitkowski@doh.hawaii.gov.

Sincerely,

Patti Kitkowski
District Environmental Health Program Chief

c EPO

COUNTY COUNCIL
COUNTY OF MAUI
200 S. HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.mauicounty.gov/council

August 7, 2012

SOH/DOT Airports Division (DOTA)
Attention: Mr. Gene Matsushige
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

SUBJECT: Early Consultation Request for the Preparation of a Draft Environmental Assessment for the Proposed Roadway Improvements and ConRac Facility, Kahului Airport, State Project No. AM1032-13

Dear Mr. Matsushige:

Thank you for the opportunity to provide comments for the proposed Roadway Improvements and ConRac Facility, Kahului Airport, State Project No. AM1032-13.

After review of the information presented, I have no comments at this time.

Sincerely,

JOSEPH PONTANILLA,
COUNCIL MEMBER

NEIL ABERCROMBIE
GOVERNOR
RICHARD C. LIM
DIRECTOR
MARY ALICE EVANS
DEPUTY DIRECTOR
JESSE K. SOUKI
DIRECTOR
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-13686

August 7, 2012

To: Gene Matsushige, Head Construction Engineer
Engineering Branch, Airports Division
Department of Transportation

From: Jesse K. Souki, Director

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport
State Project No. AM1032-13 (AIR-EC 12.0281)

Thank you for the opportunity to provide comments on the preparation of a Draft Environmental Assessment (Draft EA) for the subject project. It is our understanding that the Department of Transportation, Airports Division, is proposing the construction and operation of a consolidated rental car facility (ConRAC) at Kahului Airport, and the Draft EA is being prepared to comply with both Federal Aviation Administration requirements under the National Environmental Policy Act and State of Hawaii requirements under the Hawaii Environmental Protection Act.

The proposed ConRAC facilities will include a customer service building, ready/return structure, quick turnaround area, site landscaping, infrastructure improvements, connections to terminal roadway system, and the installation of flat-plate photovoltaic panels of the roof of the ready/return structure. These improvements are proposed to provide necessary space for on-airport rental car companies to accommodate ready/return and quick turn around facilities in a single location at Kahului Airport. Other rental car activities such as excess rental car storage, dealer preparation, and heavy maintenance would continue to occur at the existing rental car facility locations on-airport. The proposed ConRAC will provide adequate facilities for rental car companies, reduce traffic and congestion on terminal roadways, and enhance the customer/passenger experience.

Five on-airport sites, as shown on Exhibit 2 enclosed with the July 23, 2012 memorandum soliciting advanced comments on the preparation of a Draft EA, will be examined, together with a no action alternative and off-site alternatives.

The Office of Planning has reviewed the material provided in your memorandum dated July 23, 2012, and has the following comments to offer:

1. The entire state is defined to be within the Coastal Zone Management Area (Hawaii Revised Statutes (HRS) Section 205A-1 - definition of "coastal zone management area"). The Draft EA should include a section that addresses the proposed project's consistency with the objectives and policies set forth in HRS Section 205A-2.

2. Based on data from the County of Maui Planning Department, it appears that four of the five on-airport sites being evaluated, Sites 1, 2, 3, and 5, are within the Special Management Area (SMA) established by the County of Maui.

   The County of Maui Planning Department should be consulted to confirm whether the on-airport sites to be examined, as well as any off-airport sites to be considered, are within the SMA, and if so determined, obtain SMA permit requirements for the proposed project.

   If it is determined that the sites (on-airport and off-airport) to be evaluated are within the SMA, the Draft EA should include a section that addresses the guidelines set forth in HRS Section 205A-26.

Thank you for the opportunity to comment on the preparation of a Draft EA for the proposed Kahului Airport roadway improvements and ConRAC project.

Should you have questions or require clarification on the comments above, please do not hesitate to contact Leo Asuncion, Coastal Zone Management Program Manager, at 587-2875.

Hawaiian Telcom
Network Engineering and Planning
OSP Engineering - Maui
60 South Church St.
Wailuku, HI 96793
Phone 808 242-5102
Fax 808 242-8899

August 22, 2012

State of Hawaii
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

Attention: Mr. Gene Matsushige

Subject: Roadway Improvement and ConRAC Facility
Kahului Airport
State Project No. AM1032-13

Dear Gene,

Thank you for allowing us to review and comment on the subject project. Your plans have been received and put on file.

Hawaiian Telcom, Inc. has no comment, nor do we require any additional information at this time.

Should you require further assistance, please call me at 242-5107.

Sincerely,

Tom Hutchison
OSP Engineer

cc: Gerry Sagucio, Section Manager

BICS File No. 1208-037 (3030)

DIR 1306

ALAN M. ARAKAWA
Mayor

DAVID C. GOODE
Director

ROWENA M. DAGDAG-ANDAYA
Deputy Director

Telephone: (808) 270-7845
Fax: (808) 270-7955

COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM NO. 434
WAILUKU, MAUI, HAWAII 96793

RALPH NAGAMINE, L.S., P.E.
Development Services Administration

CARY YAMASHITA, P.E.
Engineering Division

BRIAN HASHIRO, P.E.
Highways Division

August 22, 2012

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
2012 AUG 27 P 4:36

Glenn M. Okimoto, Ph.D.
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Dr. Okimoto:

SUBJECT: ROADWAY IMPROVEMENTS AND CONRAC FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

We reviewed the subject application and have no comments at this time, but wish to hold our comments until review of the Draft Environmental Assessment.

Please call Rowena M. Dagdag-Andaya at (808) 270-7845 if you have any questions regarding this letter.

Sincerely,

DAVID C. GOODE
Director of Public Works

DCG:RMDA:jtc
xc: Highways Division
Engineering Division
S:\LUCA\CZM\Draft Comments\kahului_airport_roadway_improvements_project_am1032-13_jtc.wpd

Stephen Culberson

From: kevin.h.funasaki-contractor@hawaii.gov
Sent: Thursday, August 23, 2012 8:05 PM
To: kimberly.k.evans@hawaii.gov
Cc: lynette.kawaoka@hawaii.gov; Ura Quoniou
Subject: Fw: Request for Comment Re: State Project No. AM1032-13

FYI: Forward from Maui County. Thanks, Kevin

----- Forwarded by Kevin H Funasaki-Contractor/AIR/HIDOT on 08/23/2012 03:04 PM -----

From: Gene Matsushige/AIR/HIDOT@HIDOT
To: Kevin.h.funasaki-contractor@hawaii.gov,
Date: 08/23/2012 02:07 PM
Subject: Fw: Request for Comment Re: State Project No. AM1032-13

Reply from Maui County

Gene Matsushige, Section Head
STATE OF HAWAII
Department of Transportation
Airports Division
400 Rodgers Blvd., Suite 700
Honolulu, Hawaii 96819-1880
Voice: (808) 838-8826
Cellular: (808) 281-8826
FAX: 838-8751
Email: gene.matsushige@hawaii.gov
gmspeedbird@gmail.com

----- Forwarded by Gene Matsushige/AIR/HIDOT on 08/23/2012 02:07 PM -----

From: "Paul Fasi" <Paul.Fasi@co.maui.hi.us>
To: <gene.matsushige@hawaii.gov>,
Cc: "Clayton Yoshida" <Clayton.Yoshida@co.maui.hi.us>
Date: 08/23/2012 12:50 PM
Subject: Request for Comment Re: State Project No. AM1032-13

Gene,

This is in response to your Dept's. request for comment dated July 23, 2012 (AIR-EC, 12.0279) on the Roadway Improvements and ConRAC Facility at the Kahului Airport.

At this time, the Planning Dept. has no comment. The Dept. would like to thank you for the opportunity to comment. Please call me at 808-270-7814 or respond to this email if you need further clarification.

Sincerely,

Paul Fasi
Staff Planner
Maui Planning Dept., Current Div.

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ALAN M. ARAKAWA
Mayor

KYLE K. GINOZA, P.E.
Director

MICHAEL M. MIYAMOTO
Deputy Director

TRACY TAKAMINE, P.E.
Solid Waste Division

ERIC NAKAGAWA, P.E.
Wastewater Reclamation Division

COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2200 MAIN STREET, SUITE 100
WAILUKU, MAUI, HAWAII 96793

August 15, 2012

Mr. Gene Matsushige
State of Hawaii
Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

SUBJECT: **ROADWAY IMPROVEMENTS AND CONRAC FACILITY STATE PROJECT NO. AM1032-13, KAHULUI AIRPORT EARLY CONSULTATION FOR DRAFT EA**

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:

   a. Include a plan for construction waste.

2. Wastewater Reclamation Division (WWRD) comments:

   a. Although wastewater system capacity is currently available as of 8/15/2012, the developer should be informed that wastewater system capacity cannot be ensured until the issuance of the building permit.
   b. Wastewater contribution calculations are required before building permit is issued.
   c. Developer shall pay assessment fees for treatment plant expansion costs in accordance with ordinance setting forth such fees. The property is located in the Kahului Sewer Service Area.
   d. Developer is required to fund any necessary off-site improvements to collection system and wastewater pump stations.
   e. Indicate on the plans the ownership of each easement (in favor of which party). Note: County will not accept sewer easements that traverse private property.

f. Kitchen facilities within the proposed project shall comply with pre-treatment requirements (including grease interceptors, sample boxes, screens etc.)
g. Non-contact cooling water and condensate should not drain to the wastewater system.
h. The existing and proposed wastewater system in the Kahului Airport area shall remain privately owned and maintained.

If you have any questions regarding this memorandum, please contact Michael Miyamoto at 270-8230.

Sincerely,

KYLE K. GINOZA, P.E.
Director of Environmental Management

DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
HOUSING DIVISION
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
JO-ANN T. RIDAO
Director
JAN SHISHIDO
Deputy Director

35 LUNALILO STREET, SUITE 102 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7351 • FAX (808) 270-6284

DIR 1337

STPVJM

August 28, 2012

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
2012 SEP -4 A 11:40

Mr. Glenn M. Okimoto, Ph.D., Director
State of Hawaii, Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Okimoto:

Subject: **Preparation of an Environmental Assessment for Roadway and ConRAC Facility at the Kahului Airport, Maui, State project No. AM1032-13.**

The Department has reviewed the preparation of an Environmental Assessment (EA) for the above subject project. Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. At the present time, the Department has no additional comments to offer.

Please call Mr. Veranio Tongson Jr. of our Housing Division at (808) 270-1741 if you have any questions.

Sincerely,

Clyde Almeida
Assistant Housing Administrator

cc: Director of Housing and Human Concerns

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 29, 2012

Department of Transportation
Attention: Mr. Gene Matsushige, Head Construction Engineer
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Matsushige:

SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13

Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on August 14, 2012, enclosed are comments from the Commission on Water Resource Management on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON

WILLIAM D. BALFOUR, JR.
SUMNER ERDMAN
LORETTA J. FUDDY, A.C.S.W., M.P.H.
NEAL S. FUJIWARA
JONATHAN STARR
TED YAMAMURA

WILLIAM M. TAM
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

2012 AUG 28 A 11: 33
DEPT OF LAND & NATURAL RESOURCES
STATE OF HAWAII

August 28, 2012

REF: Kahului Airport Improvements EA Prep

TO: Russell Tsuji, Administrator
Land Division

FROM: William M. Tam, Deputy Director
Commission on Water Resource Management

SUBJECT: Roadway Improvements and CONRAC Facility, Kahului Airport, State Project No. AM1032-13, Kahului, Island of Maui

FILE NO.:
TMK NO.: (2)3-8-01(varies)

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at http://www.hawaii.gov/dlnr/cwrm.

Our comments related to water resources are checked off below.

☐ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.

☒ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.

☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.

☒ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/pp/index.htm.

☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/czm/initiative/lid.php.

☒ 6. We recommend the use of alternative water sources, wherever practicable.

☐ 7. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM:
Additional information and forms are available at http://hawaii.gov/dlnr/cwrm/resources_permits.htm.

☐ 8. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.

☐ 9. A Well Construction Permit(s) is (are) required before any well construction work begins.

☐ 10. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.

☐ 11. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.

☐ 12. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.

☐ 13. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.

☐ 14. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.

☐ 15. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.

☒ 16. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.

☒ OTHER:
For project landscaped areas, we recommend following the Landscape Industry Council of Hawaii's irrigation water conservation best practices (http://landscapehawaii.org/_library/images/lich_irrigation_water_position_statement%2020110107.pdf).
We also recommend that stormwater be utlized onsite for irrigation needs to the extent possible, and that water efficient fixtures be used in the offices and vehicle washing facilities. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/products/index.html

If there are any questions, please contact Lenore Ohye at 587-0216.

8/7/12

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 2, 2012

MEMORANDUM

TO: FROM:

DLNR Agencies:
___Div. of Aquatic Resources
___Div. of Boating & Ocean Recreation
_X_Engineering Division
___Div. of Forestry & Wildlife
___Div. of State Parks
_X_Commission on Water Resource Management
_X_Office of Conservation & Coastal Lands
_X_Land Division – Maui District
_X_Historic Preservation

RECEIVED
LAND DIVISION
2012 AUG -2 P 2:28
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13
LOCATION: Kahului, Island of Maui; TMK: (2) 3-8-01 (varies)
APPLICANT: State Department of Transporatation

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by August 13, 2012.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

2012 AUG -3 AM 8:13

Attachments

( ) We have no objections.
( ) We have no comments.
(X) Comments are attached.

Signed:
Print Name: William M. Tam, Deputy Director
Date: August 28, 2012

cc: Central Files

Maui Electric Company, Ltd.•210 West Kamehameha Avenue•P. O. Box 398•Kahului, Maui, HI 96733-0698•(808) 871-8461

October 29, 2012

Mr. Gene Matsushige, Airports Division
Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport
Kahului, Maui, Hawaii

Dear Mr. Matsushige,

Thank you for allowing us to comment on the subject project.

In reviewing our records and the information received, Maui Electric Company (MECO), we highly encourage the customer's electrical consultant to submit the electrical demand requirements and project time schedule as soon as practical so that we can properly evaluate the impact to our facilities and provide service on a timely basis. In addition, we highly encourage the customer to contact Steven Rymsha at 872-3292 of our Renewable Energy Department for any interconnection requirements as necessary to accommodate the customer's photovoltaic (PV) system.

Should you have any questions or concerns, please feel free to contact Kelcie Kawamura at 872-3246.

Sincerely,

Ray Okazaki
Supervisor, Engineering

Correspondence with State Historic Preservation Division

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U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Airports District Office

300 Ala Moana Blvd, Rm. 7-128
Honolulu, HI 96813
MAIL: Box 50244
Honolulu, HI 96850-0001
Telephone: (808) 541-1232
FAX: (808) 541-3566

CERTIFIED MAIL

October 2, 2012

Ms. Pua Aiu, Administrator
Hawaii Historic Preservation Division
Kahuhihewa Building
601 Kamokila Boulevard
Kapolei, Hawaii 96706

Dear Ms. Aiu:

Subject: Proposed Consolidated Rental Car Facility
Kahului Airport, Maui County, Hawaii; Section 106 Coordination

The Federal Aviation Administration (FAA) and the State of Hawaii, Department of Transportation, Airports Division (HDOTA), have initiated the preparation of an Environmental Assessment (EA) for the construction and operation of a consolidated rental car facility at Kahului Airport (OGG). The EA is being prepared to comply with both FAA requirements under the National Environmental Policy Act (NEPA) and State of Hawaii requirements under the Hawaii Environmental Protection Act (HEPA). HDOTA and the FAA are preparing the EA for the proposed undertaking pursuant to the National Environmental Policy Act of 1969. The Federal action is approval of the Airport Layout Plan for OGG.

The proposed undertaking includes the construction of consolidated rental car (ConRAC) facilities consisting of a Customer Service Building (CSB) where all rental car counters and administrative offices would be located; Ready/Return (R/R) structure (for rental car pick up and return and overflow parking); Quick Turnaround Area (QTA) for refueling, light maintenance, and washing of rental vehicles; site landscaping; infrastructure improvements to support the ConRAC facilities; connections to the terminal roadway system; and flat-plate photovoltaic panels on the roof of the R/R structure. **Exhibit 1** illustrates the elements of the proposed project under consideration and a conceptual site layout.

1. Area of Potential Effect

The FAA has determined the boundaries of the Area of Potential Effect (APE) as shown of the attached **Exhibit 2**. The APE includes the proposed Alternative Sites 4 and 5. The APE includes the boundary of physical disturbance for the Sponsor's Proposed Action

and the viable alternatives. The APE is located within the existing OGG property. The proposed undertaking will not affect the number or type of aircraft using the Airport, thus FAA delineated a Direct Effects APE only. No significant change in the indirect effects from aircraft noise would result from the proposed undertaking.

Please note, the proposed airport access road also highlighted in yellow on **Exhibit 2** had been previously reviewed by the State Historic Preservation Division under the 1997 EIS for Proposed Airport Master Plan Improvements. A Programmatic Agreement was executed in December 1997 as a result of the EIS. There are no known issues related to the proposed airport access road as a result of the Programmatic Agreement and Final 1997 EIS.

An Archaeological Inventory Survey was conducted by Scientific Consultant Services (SCS; Bassford and Dega) in 2012 (**Attachment 1**) on the two Alternative Sites which occur on 40-acres of undeveloped land adjacent to the Kahului Airport. The two alternative sites have variable acreage and different tax map key (TMK) designations (**Exhibit 3**):

- Alternative Site 4 composes 23 acres of cleared, former sugar cane land and this site runs from near the southwestern flank of the Airport runway area to Dairy Road.
- Alternative Site 5 is composed of 15.7 acres of land that is currently used as a baseyard and construction materials storage area. Large piles of excavated silty clay and fill soils from other locations, as well as asphalt, are mounded over 25 feet in places.

2. Historical Background

Hundreds of Land Commission Awards (LCA) are documented for Wailuku Ahupua`a, although, in keeping with the broad settlement pattern, most of these were located in and around `Īao Valley, west of the Wailuku Town and well removed from the project area. The existence of such large numbers of LCAs, however, attests to the large settlements in the lower `Īao Valley during the mid-nineteenth century; residents of Kahului were no doubt drawn into this sphere of influence. There are no LCAs for the APE.

Many of the awarded LCAs in Wailuku Ahupua`a were under sugar cane cultivation by the mid-nineteenth century. Sites and features built during this period include water irrigation ditches, terraces, free standing walls, historic houses, and mill structures. Cultivation of sugar cane dominated land use in Wailuku Ahupua`a from the 1880s through the 1990s.

SCS has monitored construction activities in and around the airport property itself; monitoring these areas did not lead to the identification of significant historic properties.

3. National Register Eligibility Determinations

The Alternative sites show evidence for previous intensive mechanical ground disturbance from grading, grubbing, blading, and filling events. The terrain is relatively flat in most of the APE, some exceptions being around and within the border areas of Alternative Site 5 which have been artificially filled, creating slopes and mounded areas. Portions of Alternative Site 5 contain currently operating businesses. Alternative Site 5 occurs at an average elevation of 40 feet above mean sea level (amsl). Alternative Site 5 is composed of 15.7 acres of land currently used as a baseyard and construction materials storage area. There is one drainage in the project area, Kalialimui Stream. The stream runs north-south under a developed portion of the site. The stream is intermittent and previously would drain into the marshlands near the coast. More recently (1990), the stream became a formalized concrete encased channel and now drains into the ocean.

Alternative Site 4 composes 23 acres of cleared, former sugar cane land and is currently totally undeveloped. Alternative Site 4 occurs at an elevation between 60 and 80 feet amsl. Alternative Site 4 includes lands that were formerly considered Crown Lands. The fee title to many lots/parcels in the Wailuku area were acquired by Claus Spreckles under Grant 3343 (from 'King Kalakaua') for use as sugar cane land. The property consisted of 24,000 acres of land from Wailuku to Paia and toward Ma`alaea, a portion of which included the current Alternative Site 4 near the highway.

During World War II (1942), the current airport area was leased by the U.S. Military and developed into Naval Air Station, Kahului (NASKA), with at least one-third of these lands still being in sugar cane. Areas inland of Runway 2/20 were sugar cane lands from the 1880s through construction of the airport and camps occurred in the area, near the fields, to the 1950s when they were torn down. After the war, in the early 1950s, air facilities were acquired by the Territorial government and utilized for commercial and general aviation purposes. This airport has since developed into the major transport hub seen today.

Archaeological Inventory Survey Results

An Archaeological Inventory Survey (Attachment 1) was conducted on 40-acres of undeveloped land adjacent to the Airport [TMK: (2) 3-8-001:123, 239 and 3-8-079:021]. Complete pedestrian survey of the three TMK Alternative Sites and the excavation of 36 representative trenches led to the identification of two historic properties identified on the surface of Alternative Site 4 and Alternative Site 5 (see enclosed **Exhibit 4**).

SIHP No.: 50-50-04-7347 (TS-1)

Site -7347 is a concrete flume running northeast-southwest (50º/230º) on Alternative Site 4 (Exhibit 4); former sugar cane lands. The flume remnant measures 30 m long by 0.50 m wide and 0.50 m deep. The flume was composed solely of concrete, with thin sidewalls and slightly thicker base. The feature was utilized to transport water to the fields and was constructed from the early to mid-1900s.

SIHP No.: 50-50-04-7348 (TS-2)

Site -7348 is a small building located in the northern, central portion of Alternative Site 5 (Exhibit 4). Site -7348 was the only standing structure in the project area and had been recently used as a temporary shelter. The building measures 10 m long by 6.3 m wide and approximately 4 m high. The building has one entry point, on the southwestern flank. Soil has been both bulldozed and eroded through the opening and around the exterior flanks of the building. An inspection of the interior only revealed recent temporary shelter use, the remainder of the structure having been completely cleared. Given the lack of ventilation, one could suspect this structure to be a military generator room. This assessment was supported by Nancy Farrell of CRMS, Inc., Army Historian (Pers. Comm.). The structure was presumably associated with World War II activities when this area was constructed as the Naval Air Station, Kahului. Thus, Site -7348 is interpreted as a small generator building having been constructed in the 1940s.

Both sites have been assessed as significant under Criterion D, but were not determined to be eligible due to lack of integrity for listing on the National Register of Historic Places (NRHP). Given the primary nature of past land use in the project area (sugar cane cultivation), as well as the absence of significant sedimentary series such as sand, no further work is recommended for the project area.

A large sample of backhoe trenches were utilized to test for the presence/absence of subsurface cultural strata and materials. Of the thirty-six trenches excavated, none yielded significant cultural features, deposits, or artifacts. The sedimentary series of the area, silt, was fairly homogenous through the project area. No natural sands were encountered in any trench.

4. Assessment of Adverse Effects on Historic Properties

Although sites -7347 and -7348 were assessed under Criterion D and are within the APE, the FAA has determined there are no historic properties listed or eligible for listing on the National Register of Historic Places. Therefore the FAA finds that the proposed undertaking will not affect any properties listed or eligible for listing on the National Register of Historic Places under 36 CFR Part 800.4(d)(1).

We request your written concurrence with the APE and our determination within 30 days of receipt of this letter. If we do not hear from your office within 30 days, we will consider a no-reply as a "concurrence."

HDOTA is also conducting a Cultural Impact Assessment in accordance with Act 50 [House Bill 2895] and the Guidelines for Assessing Cultural Impacts (OEQC 1997). The results of the Cultural Impact Assessment will be discussed in the EA, as required by HRS 343.

Please contact Gordon Wong, at 808-541-3565, if you have any questions or require additional information.

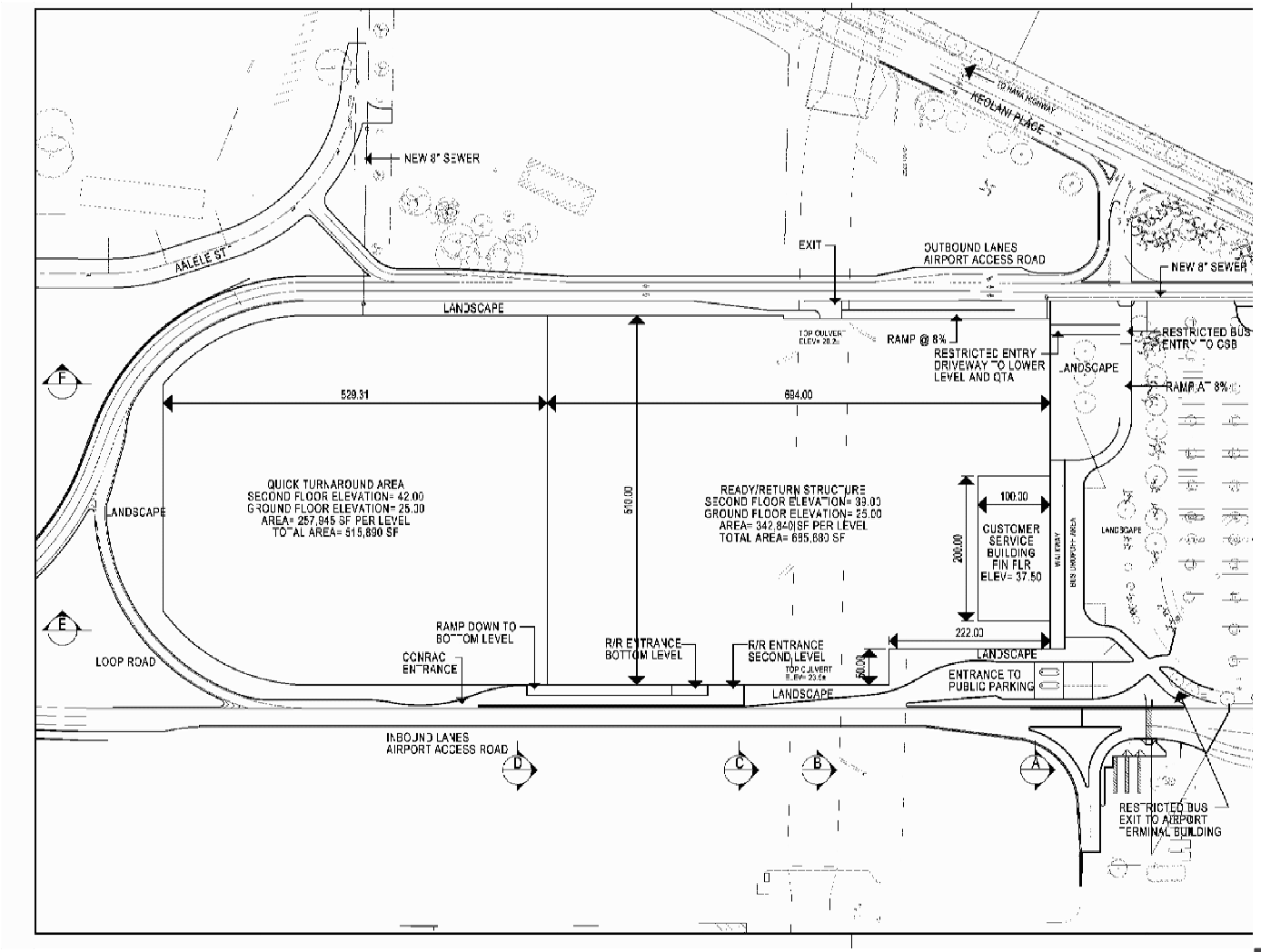
Sincerely,

Ronnie V. Simpson
Manager, Airports District Office

Enclosures
EXHIBIT 1 – PROPOSED ACTION
EXHIBIT 2 – AREA OF POTENTIAL EFFECT
EXHIBIT 3 – MAP DEPICTING PARCELS AND THEIR TMK DESIGNATIONS
EXHIBIT 4 – TAX MAP KEY OF PROJECT AREA AND IDENTIFIED SITES
ATTACHMENT 1 – ARCHAEOLOGICAL INVENTORY SURVEY REPORT

cc: (w/encls.)
Jenny Pickett, DLNR-Maui
Kimberly Evans, HDOTA

[Preliminary Draft for Discussion Purposes Only]



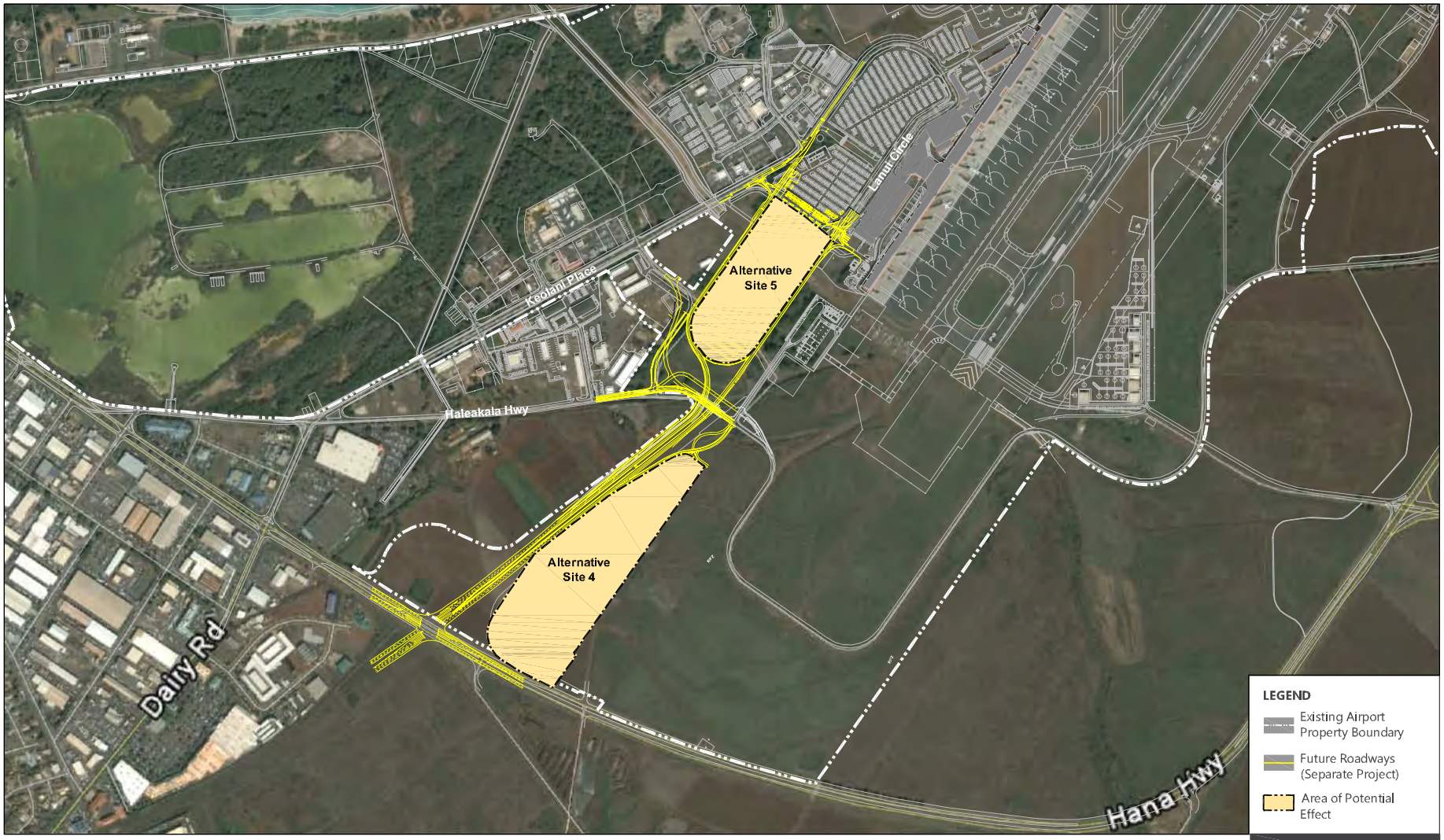
SOURCES: State of Hawaii, Airports Division, General Plan Conrac Facility, March 29, 2012.
PREPARED BY: Ricondo & Associates, Inc, August 2012.

EXHIBIT 1

NORTH 0 Not to Scale

Proposed Action

[Preliminary Draft for Discussion Purposes Only]

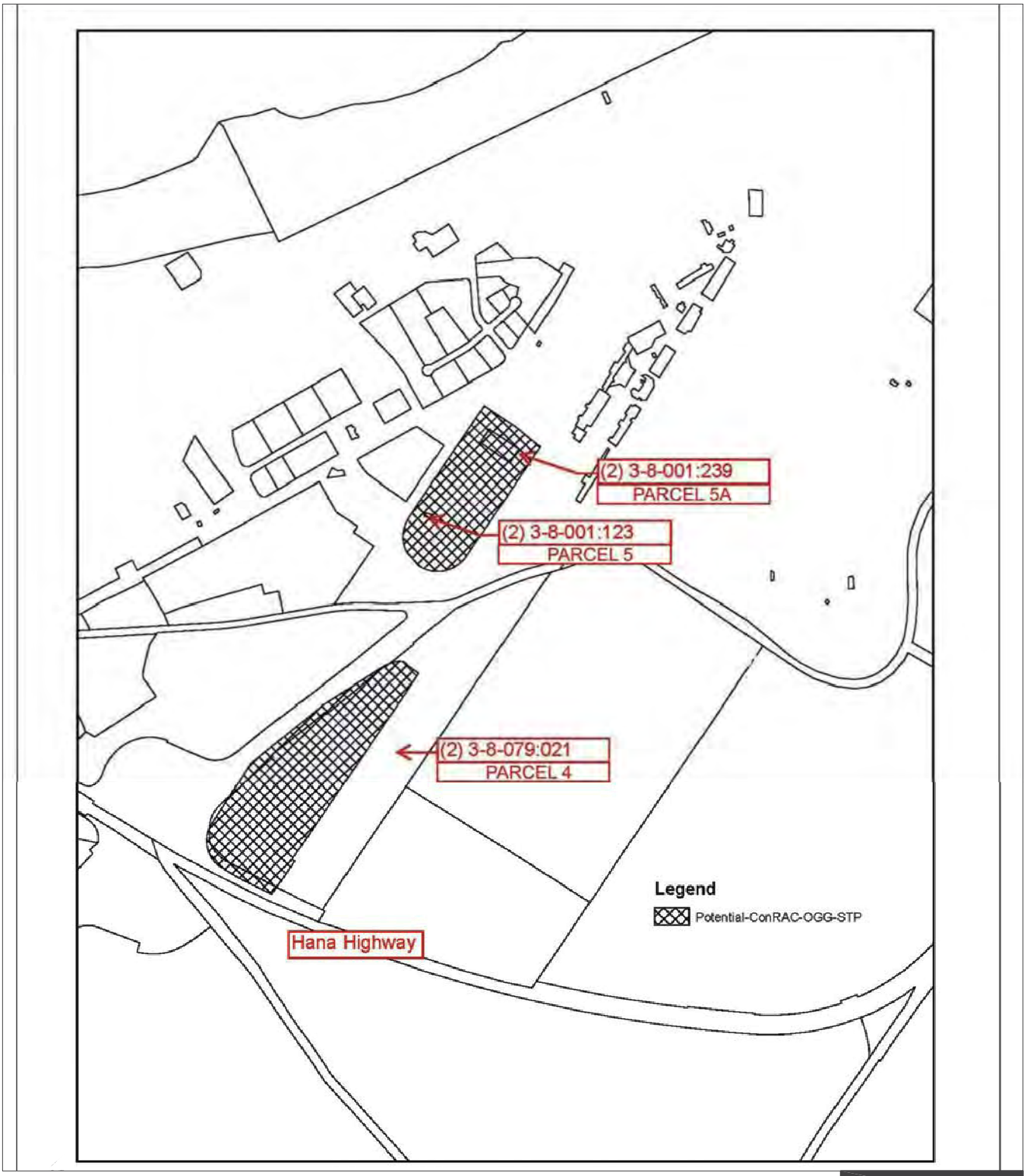


SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements & parking expansion); Ricondo & Associates, Inc., August 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2012.

NORTH 0 1,200 ft.

Area of Potential Effect

[Preliminary Draft for Discussion Purposes Only]



SOURCES: State of Hawaii, Airports Division, General Plan Conrac Facility, March 29, 2012; Scientific Consultant Services, July 2012.
PREPARED BY: Ricondo & Associates, Inc, August 2012.

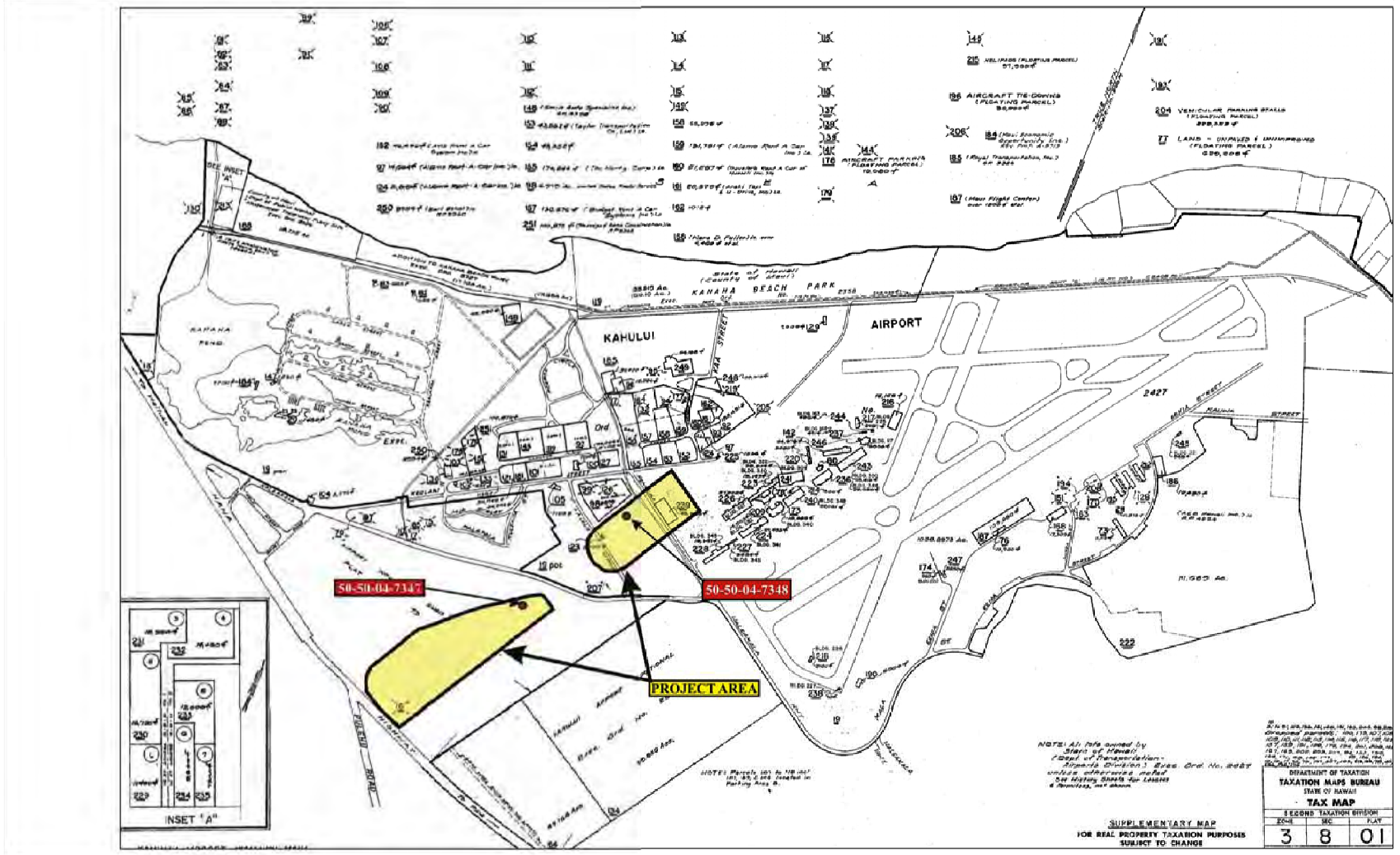
EXHIBIT 3

NORTH 0 Not to Scale

Map Depicting Parcels and Their TMK Designations

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex Study Area & Preferred Action.dwg, Layout: SHPD Ex 3, Aug 17, 2012, 4:36pm

[Preliminary Draft for Discussion Purposes Only]



SOURCES: State of Hawaii, Airports Division, General Plan Conrac Facility, March 29, 2012; Scientific Consultant Services, July 2012.
PREPARED BY: Ricondo & Associates, Inc, August 2012.

EXHIBIT 4

NORTH 0 Not to Scale

Tax Map Key of Project Area and Identified Sites

Correspondence with Office of Hawaiian Affairs

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U.S Department
of Transportation

**Federal Aviation
Administration**

Western-Pacific Region
Honolulu Airports District Office

300 Ala Moana Blvd., Rm. 7-128
Honolulu, HI 96813
MAIL: Box 50244
Honolulu, HI 96850-0001
T: (808) 541-1232
F: (808) 541-3566

CERTIFIED MAIL

October 2, 2012

Ms. Haunani Apoliana
Office of Hawaiian Affairs
711 Kapiolani Blvd, Suite 500
Honolulu, HI 96813

Subject: Proposed Consolidated Rental Car Facility
Kahului Airport, Maui County, Hawaii; Native Hawaiian Consultation

Dear Ms. Apoliana:

The Federal Aviation Administration (FAA) and the State of Hawaii, Department of Transportation, Airports Division (HDOTA), have initiated the preparation of an Environmental Assessment (EA) for the construction and operation of a consolidated rental car facility at Kahului Airport (OGG). The EA is being prepared to comply with both FAA requirements under the National Environmental Policy Act (NEPA) and State of Hawaii requirements under the Hawaii Environmental Protection Act (HEPA). HDOTA and the FAA are preparing the EA for the proposed undertaking pursuant to the National Environmental Policy Act of 1969. The FAA is the lead Federal Agency for Native Hawaiian consultation for the proposed projects. HDOTA is the sponsor for Kahului Airport.

The primary purpose of consultation as described in the National Historic Preservation Act of 1966 (NHPA), as amended in 1992 to include consultation with Native Hawaiian Organizations (NHO), is to ensure that there is an opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect Native Hawaiians.

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect Native Hawaiians related to planned and proposed airport improvements. Early identification of Native Hawaiian concerns will allow the FAA to consider ways to avoid and minimize potential impacts to Native Hawaiians resources and practices as project planning and alternatives are developed and refined. We are available to discuss details of the proposed project with you.

The proposed undertaking includes the construction of consolidated rental car (ConRAC) facilities consisting of a Customer Service Building (CSB) where all rental car counters and administrative offices would be located; Ready/Return (R/R) structure (for rental car pick up and return and overflow parking); Quick Turnaround Area (QTA) for refueling, light maintenance, and washing of rental vehicles; site landscaping; infrastructure improvements to support the ConRAC facilities; connections to the terminal roadway system; and flat-plate photovoltaic

panels on the roof of the R/R structure. **Exhibit 1 (Proposed Action)** illustrates the elements of the proposed project under consideration and a conceptual site layout.

The boundaries of the project area are shown on the attached **Exhibit 2 (Area of Potential Effect)**. The project area includes the airport access road and proposed Alternative Sites 4 and 5 (Site 5 being the preferred location). The project will be located on existing airport property.

Please note, the proposed airport access road shown highlighted on **Exhibit 2** had been previously reviewed under the 1997 EIS for Proposed Airport Master Plan Improvements. A Programmatic Agreement was executed in December 1997 as a result of the EIS. The Office of Hawaiian Affairs was also a signatory to the Programmatic Agreement. There are no known issues related to the proposed airport access road as a result of the Programmatic Agreement and Final 1997 EIS.

An Archaeological Inventory Survey (**Attachment 1**) was prepared in August 2012 on the two Alternative Sites. The Survey identified two potential historic properties (a concrete flume on former sugar cane lands from the early to mid-1900s and a small building presumably associated with World War II activities constructed in the 1940s).

HDOTA is also conducting a Cultural Impact Assessment. The results of the Cultural Impact Assessment will be discussed in the EA, as required by HRS 343.

We understand that you may have concerns about the confidentiality of information on areas or resources of religious, traditional and cultural importance to Native Hawaiians. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained. If you know of other Native Hawaiian Organizations, individuals or groups with whom we should consult, we would appreciate your help in putting us in contact with them.

Your timely response will greatly assist us in incorporating your concerns into project planning. We respectfully request that comments be submitted in writing by November 2, 2012. Please do not hesitate to contact Gordon Wong, Lead Program Manager, at 808-541-3565 or by e-mail at gordon.wong@faa.gov if you have any questions or require additional information.

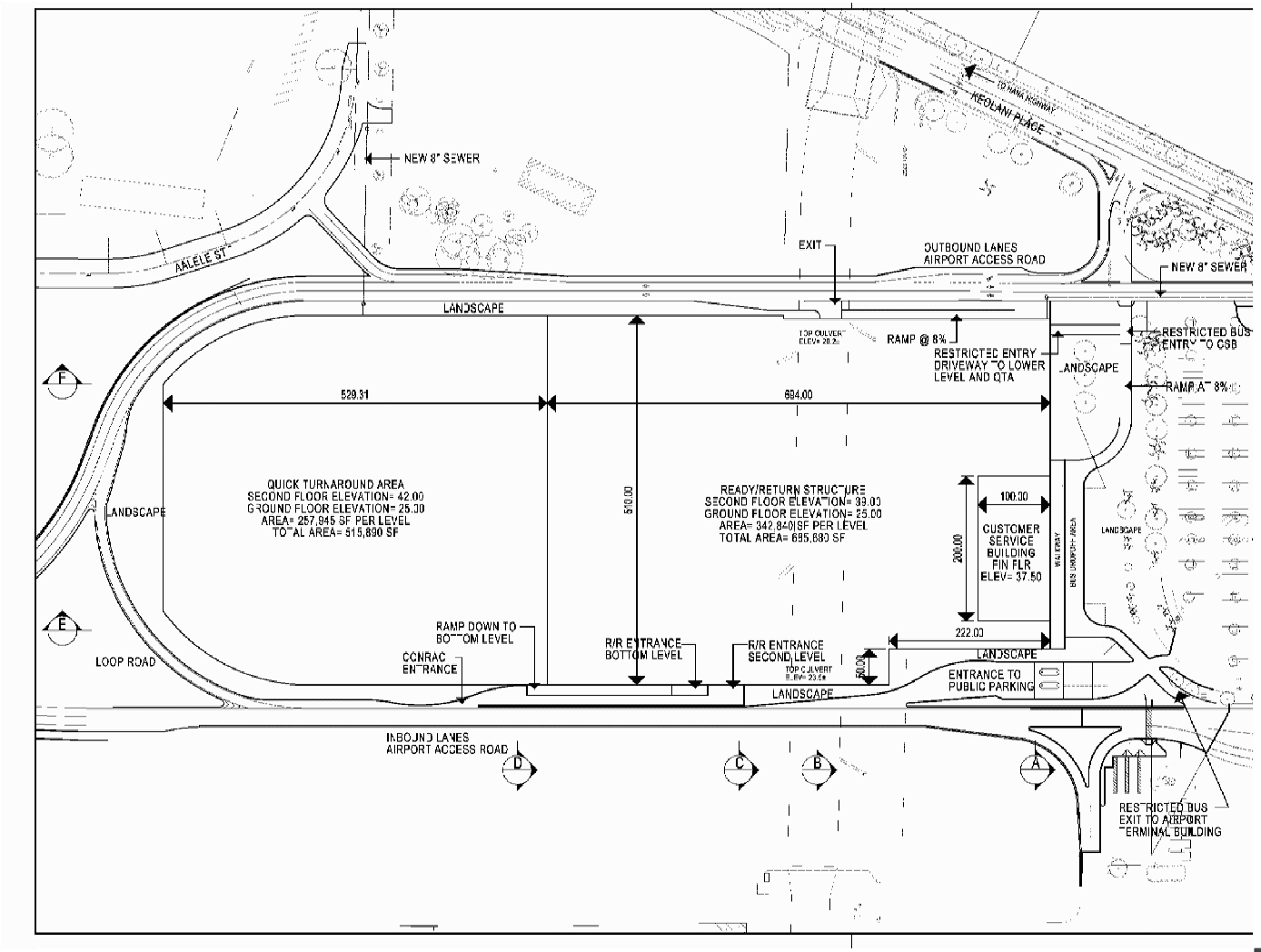
Sincerely,

Ronnie V. Simpson
Manager, Airports District Office

Enclosures
EXHIBIT 1 – PROPOSED ACTION
EXHIBIT 2 – AREA OF POTENTIAL EFFECT
ATTACHMENT 1 – ARCHAEOLOGICAL INVENTORY SURVEY REPORT

cc: Kimberly Evans, HDOTA (w/o encls.)

[Preliminary Draft for Discussion Purposes Only]



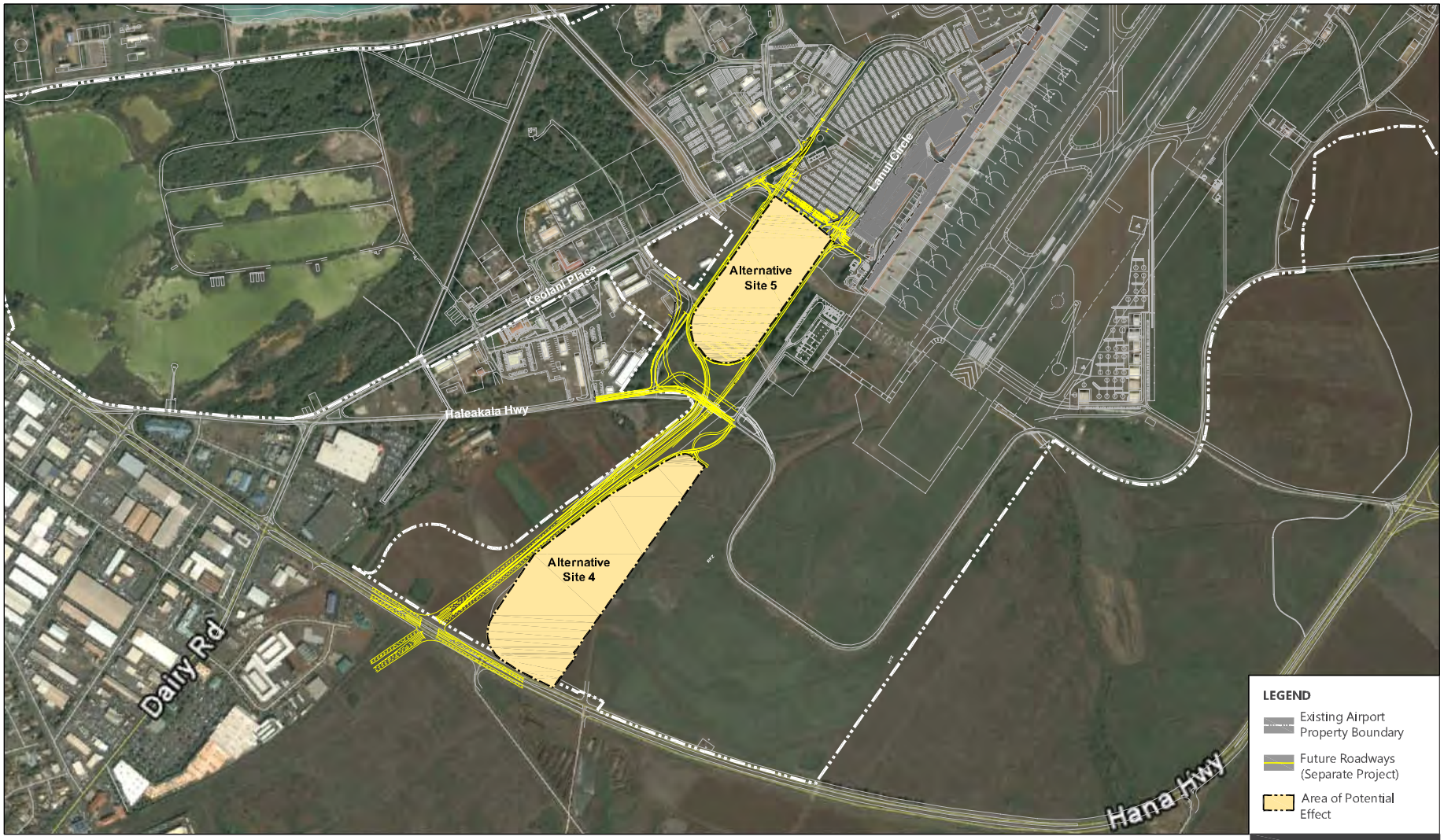
SOURCES: State of Hawaii, Airports Division, General Plan Conrac Facility, March 29, 2012.
PREPARED BY: Ricondo & Associates, Inc, August 2012.

EXHIBIT 1

NORTH 0 Not to Scale

Proposed Action

[Preliminary Draft for Discussion Purposes Only]



SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements & parking expansion); Ricondo & Associates, Inc., August 2012.
PREPARED BY: Ricondo & Associates, Inc., August 2012.

NORTH 0 1,200 ft.

Area of Potential Effect

Correspondence with U.S. Fish & Wildlife Service

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U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Airports District Office

300 Ala Moana Blvd, Rm. 7-128
Honolulu, HI 96813
MAIL: Box 50244
Honolulu, HI 96850-0001
Telephone: (808) 541-1232
FAX: (808) 541-3566

CERTIFIED MAIL

December 13 , 2012

Dr. Loyal Mehrhoff
Field Supervisor
Pacific Islands Fish and Wildlife Service
300 Ala Moana Boulevard, Room 3-122
P. O. Box 50088
Honolulu, Hawaii 96850

Subject: Proposed Consolidated Rental Car Facility & Airport Access Road Phase II Kahului Airport, Maui County, Hawaii; Section 106 Formal Consultation

Dear Dr. Mehrhoff:

The State of Hawaii, Department of Transportation, Airports Division (HDOTA) and the Federal Aviation Administration (FAA) are preparing a federal Environmental Assessment (EA) for the construction and operation of a consolidated rental car facility (CONRAC) at Kahului Airport (OGG). The EA is being prepared to comply with both FAA requirements under the National Environmental Policy Act (NEPA) and State of Hawaii requirements under the Hawaii Environmental Protection Act (HEPA). HDOTA and the FAA are preparing the EA for the proposed undertaking pursuant to the National Environmental Policy Act of 1969. The Federal action is approval of the Airport Layout Plan for OGG.

The purpose of this letter is to initiate formal consultation with US Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act for the proposed project.

We are enclosing two reports prepared by Ricondo & Associates, Inc., for the CONRAC project that provides a detailed description of the action being considered and addresses potential impacts of the project on federally-listed species, designated critical habitat. The Botanical and Fauna Surveys Report dated June 2012 included surveys of the various locations proposed for the CONRAC. The Biological Assessment dated November 2012 included the Airport Access Road Phase II. An EA for Airport Access Road Phase I was prepared earlier this year by the Federal Highways Administration. We note the Airport Access Road Phase II was also covered in the Kahului Airport Improvements EIS dated September 1997.

The proposed undertaking includes the construction of a CONRAC consisting of a Customer Service Building where all rental car counters and administrative offices would

be located; Ready/Return (R/R) structure for rental car pick up and return and overflow parking); Quick Turnaround Area (QTA) for refueling, light maintenance, and washing of rental vehicles; site landscaping; infrastructure improvements to support the CONRAC facilities; connections to the terminal roadway system; and flat-plate photovoltaic panels on the roof of the R/R structure. **Exhibit 1 Proposed Action** illustrates the elements of the proposed project under consideration and a conceptual site layout. **Exhibit 1-1 Proposed Projects** highlights the boundaries of the project area. The project area includes the airport access road and proposed Alternative Sites 4 and 5 (Site 5 being the preferred location). The project will be located on existing airport property. Both Phase I (FHWA/HDOT-Highways project) and Phase II (FAA/HDOT-Airports project) are highlighted in orange and yellow, respectively.

PROJECT BACKGROUND

Kahului Airport is served by seven on-Airport rental car businesses (Alamo, Avis, Budget, DTAG or Dollar Rent A Car, Enterprise, National, and Hertz). The existing rental car facilities at OGG are located northwest of the passenger terminal area and public parking lots (see **Exhibit 2**). With the exception of Enterprise Rent-a-Car customers, all customers returning rental cars must circulate through the Airport terminal roadway adding traffic congestion to the on-Airport roadways.

The purpose of the proposed project is to provide the necessary space for on-Airport rental car companies to accommodate R/R and QTA facilities in a single location at the Airport. Excess rental car storage, dealer preparation, and heavy maintenance would continue to occur at the existing rental car facility locations on-Airport. The proposed project would provide adequate facilities for rental car companies, reduce traffic and congestion on the terminal roadway system, and enhance customer (passenger) experience.

Phase II of the airport access road will complete the roadway project funded by FHWA and HDOT-Highway to provide additional capacity and alleviate traffic congestion on Dairy Road and Keolani Place.

EFFECTS ON FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT

Botanical and fauna surveys of Alternative Sites 4 and 5 and the Airport Access Road Phase II were conducted. The botanical surveys determined that Sites 4 and 5 are dominated by non-native vegetation with a few common native species scattered throughout. The faunal surveys found non-native mammals, birds, insects, and reptiles on both sites, but no native fauna. No federally-listed threatened or endangered species or candidate species were found on either site. In addition, no special habitat was found on either site.

The Airport Access Road corridor consists mostly of open grassland in the southern portion of the highway corridor. The northern portion, where the corridor splits to form the Lanui Circle at the Airport passenger terminal entrance, consists of a variety of grasses, shrubs, and trees. Most of the plant species are non-native weeds typical of disturbed and abandoned agricultural lands.

The endemic and endangered Blackburn's sphinx moth (*Manduca blackburni*) has been known to occur in the immediate vicinity of Alternative Sites 4 and 5 but was not observed during the survey. This large moth has developed an alternative host plant relationship with the non-native tree tobacco (*Nicotiana glauca*) which is playing a role in the moth's survival and recovery. Several tree tobacco plants were seen on both Alternative Sites 4 and 5. Examination of these plants failed to find any eggs or larvae of the moth, although such activity is usually confined to the winter and early spring months when moisture and rapid plant growth are occurring. The pupae of these moths, however, may be present in the soil and leaf litter below the tree tobacco plants where they migrate after their larvae mature and enter the pupal stage where they would remain until emerging as adults at the onset of the next wet season.

A special effort was also made to look for any occurrence of the endemic and endangered Hawaiian hoary bat (Lasirus cinereus semotus) by conducting an evening survey on both sites. No visual evidence of the Hawaiian hoary bat was observed. However, an electronic bat detector (Batbox IIID) was utilized, set to the frequency of 27,000 hertz that these bats are known to use for echolocation. No bats were detected using this device during the June survey. During the October surveys, no bats were seen at twilight even though visibility was excellent. However, following darkness, vocalizations of at least one bat was detected as it made foraging passes in search of airborne insects, primarily nocturnal moths.

The Kanaha Pond and the Kanaha Pond Wildlife Sanctuary, which are located approximately one-quarter mile north of the project sites has been designated as critical habitat areas for the Blackburn's sphinx moths. The plant species potentially utilized by the moths present on the two sites could be relocated to these areas. The relocation would occur at the most appropriate time, according to the moth season.

Mitigating measures and best management practices can be incorporated into the development plans for the proposed CONRAC and Phase II of the Airport Access Road that will help to preserve any existing habitat for these species. The tobacco trees on the project sites that would be impacted could be removed during the most appropriate season. The USFWS can be consulted on the development of this plan and their input incorporated into the mitigating measures.

After reviewing the current status of these species, the effects of the proposed project, and proposed measures to avoid, minimize and compensate for effects to listed species, and designated critical habitat, the FAA has determined that the project ***may affect, but is not likely to adversely affect*** the Blackburn's sphinx moth or Hawaiian Hoary bat.

FAA seeks USFWS's concurrence with our determinations made pursuant to Title 50, Code of Federal Regulations Part 402, for the proposed project.

We request a response to this letter relative to Section 7 consultation requirements within 30 days of your receipt. If you have any questions or wish to further discuss this project, please do not hesitate to contact Gordon Wong at (808) 541-3565 or gordon.wong@faa.gov.

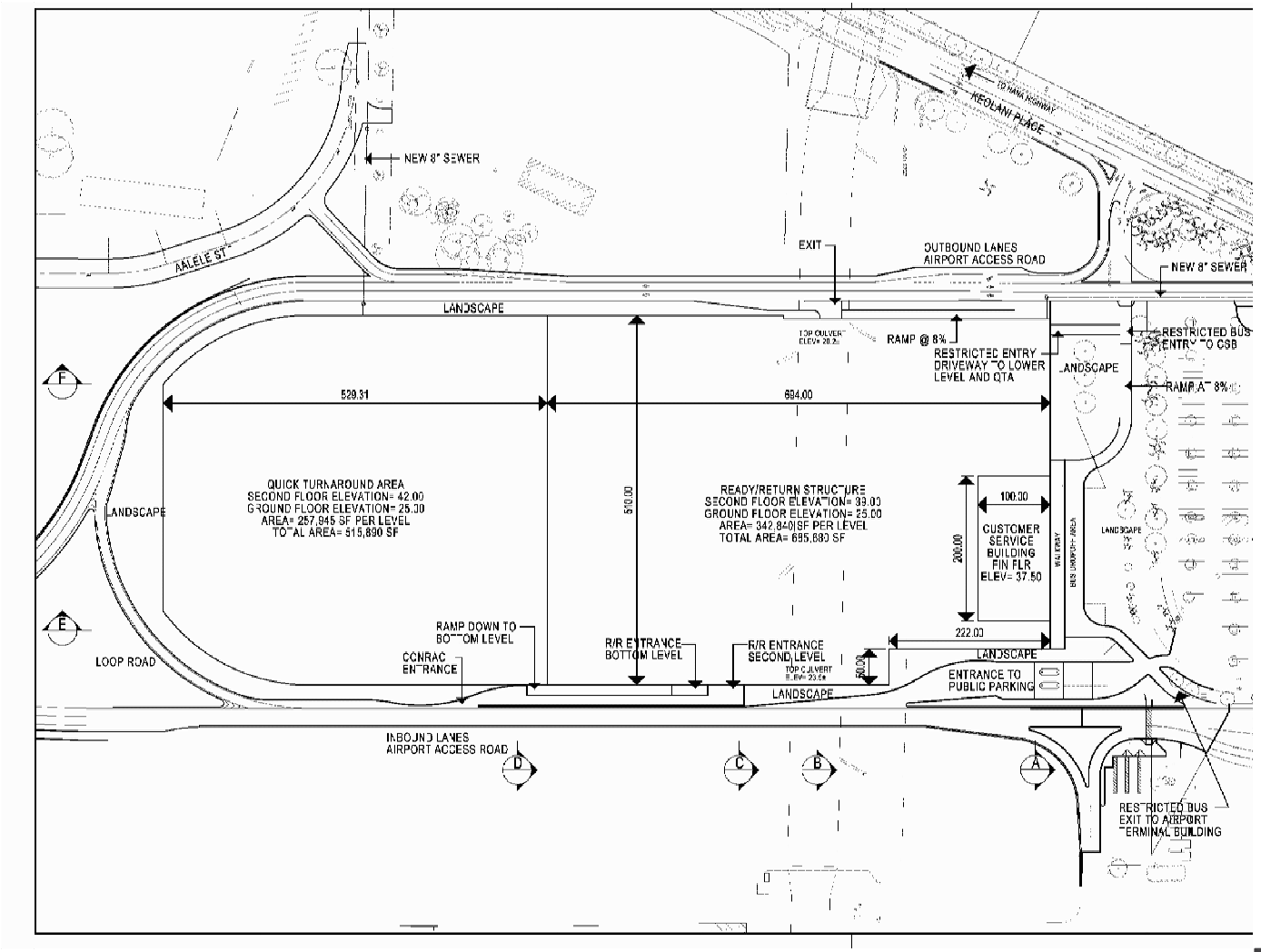
Sincerely,

Ronnie V. Simpson
Manager, Airports District Office

Enclosures
EXHIBIT 1 – PROPOSED ACTION
EXHIBIT 1-1 – PROPOSED PROJECTS
EXHIBIT 2 – EXISTING CAR RENTAL FACILITIES
BOTANICAL & FAUNA SURVEYS DATED JUNE 2012
BIOLOGICAL ASSESSMENT-PROPOSED CONRAC & AIRPORT ACCESS ROAD PHASE II DATED 11/16/2012

cc: (w/encls.)
Kimberly Evans, HDOTA
Kevin Funasaki, Bowers + Kubota Consulting
Stephen Culberson, Ricondo & Associates, Inc.

[Preliminary Draft for Discussion Purposes Only]



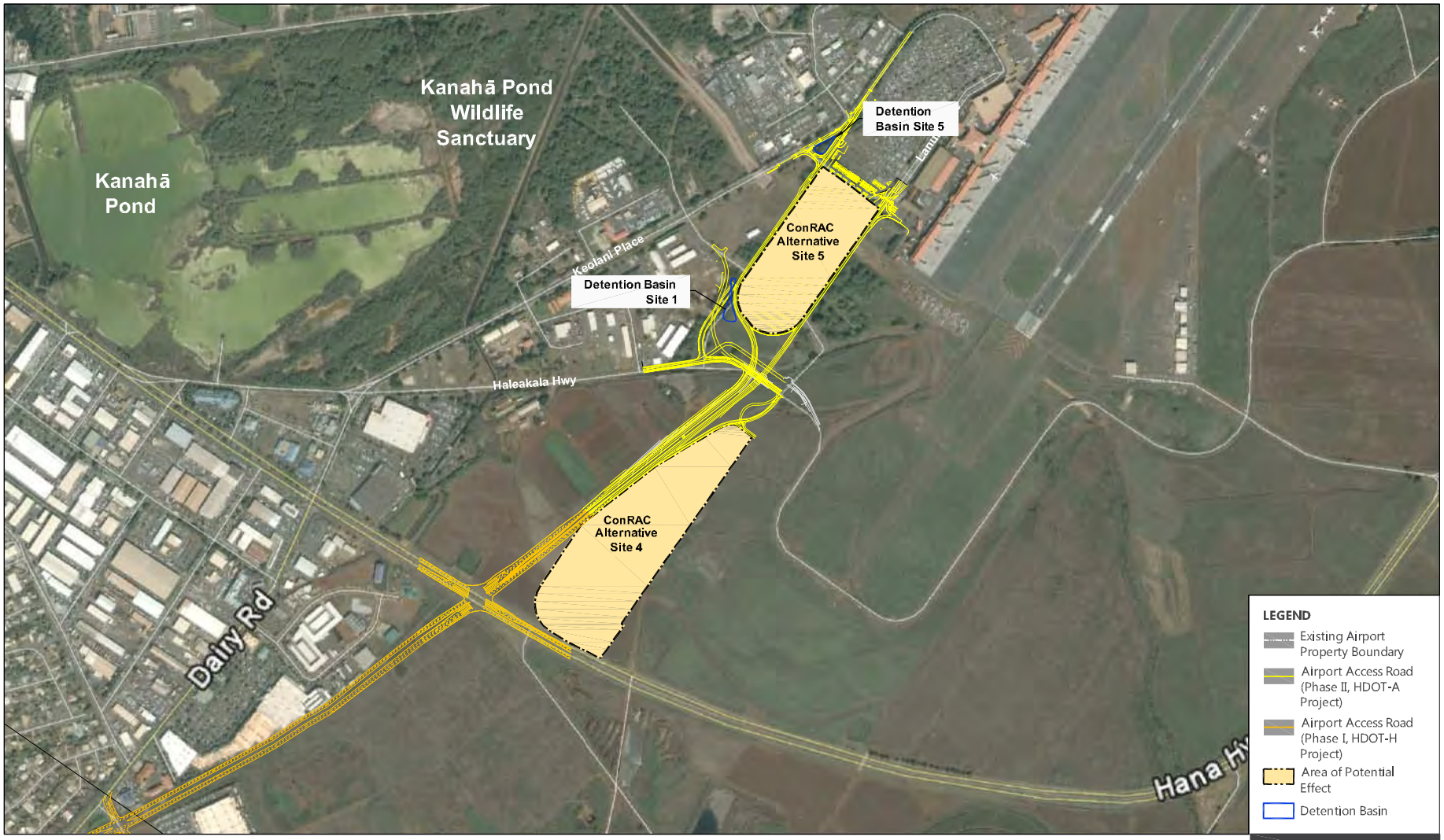
SOURCES: State of Hawaii, Airports Division, General Plan Conrac Facility, March 29, 2012.
PREPARED BY: Ricondo & Associates, Inc, August 2012.

EXHIBIT 1

NORTH 0 Not to Scale

Proposed Action

[Preliminary Draft for Discussion Purposes Only]



SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements & parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., November 2012.

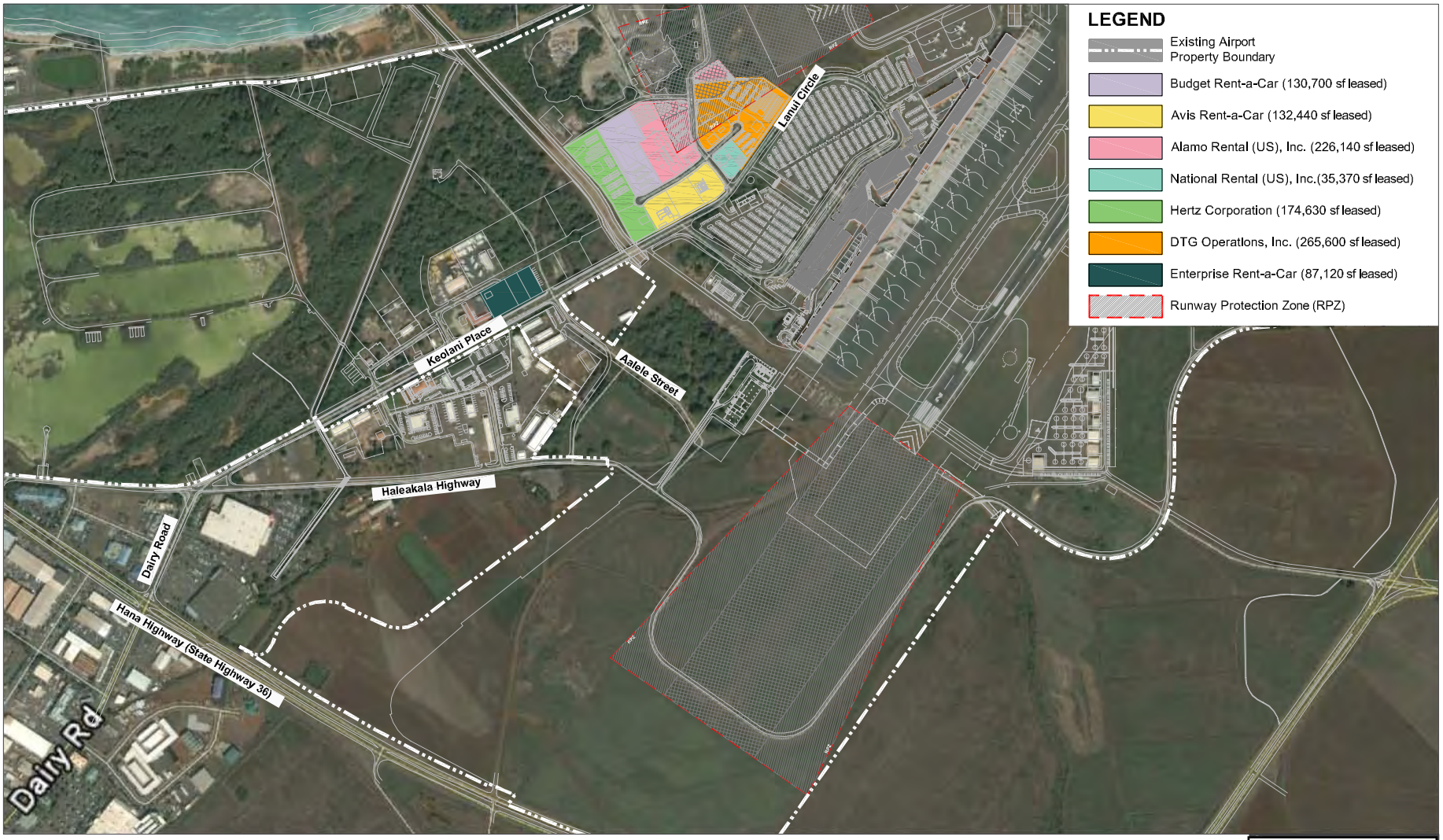
EXHIBIT 1-1

NORTH 0 1,200 ft.

Proposed Projects at Kahului Airport

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 3 Study Area & Preferred Action_08202012.dwg_Layout: BA Ex 1-1_Nov 16, 2012, 1:35pm

[Preliminary Draft for Discussion Purposes Only]



SOURCE: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Master Plan, April 19, 2011; Ricondo & Associates, Inc., July 2012.
PREPARED BY: Ricondo & Associates, Inc., July 2012.

EXHIBIT 2

NORTH

0 1,100 ft.

Existing Rental Car Facilities

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 1-2 Existing Rental Car Company Sites.dwg_Layout: Existing Facilities_Jul 13, 2012, 9:30am

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:
2013-I-0084

JAN 16 2013

Mr. Ronnie V. Simpson
Manager, Airports District Office
U.S. Department of Transportation
Federal Aviation Administration
300 Ala Moana Boulevard, Room 7-128
Honolulu, Hawaii 96850-0001

Subject: Informal Consultation Request for the Kahului Airport Improvements, Consolidated Rental Car Facility Project, Maui

Dear Mr. Simpson:

The U.S. Fish and Wildlife Service (Service) received your letter on December 17, 2012, requesting concurrence with your determination that the Kahului Airport improvement project may affect, but is not likely to adversely affect the endangered Blackburn sphinx moth (*Manduca blackburni*) and the Hawaiian hoary bat (*Lasiurus cinereus semotus*) pursuant to section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*). This informal consultation addresses the expansion of the consolidated rental car facility, access road, and detention basin as part of the Kahului Airport improvements project on the island of Maui.

We request additional information to fully understand the potential direct and indirect impacts to listed species pursuant to the scope of the full project to include the area impacted by the new access road, rental car facility expansion, and the water detention basin. The Service requests the following information:

1. According to documentation in our files, as well as information provided by the Hawaii Biodiversity and Mapping Program, the Blackburn's sphinx moth has been documented as occupying the action area and its vicinity year round. Surveys for the endangered Blackburn's sphinx moth were conducted in June and October of 2012, respectively, without recording any presence of the species. However, to increase the potential for observation of the species when it occurs on site, the Service recommends that surveys for Blackburn's sphinx moth be conducted during the wettest portion of the year (usually November-April) and approximately four to eight weeks following a significant rainfall event. Looking for the species when host plants are green and lush increases the

probability of detecting Blackburn's sphinx moth larvae, leaf chewing and other signs of larval feeding, frass, and eggs.

2. The planned installation of stormwater detention basins for alternative site 4 and alternative site 5 in the project description (Exhibit 1-1 in your letter) poses an attractive nuisance to the endangered Hawaiian stilt (*Himantopus mexicanus knudseni*). The Hawaiian stilt may become attracted to the detention basins due to the proximity to the adjacent Kanaha Pond State Wildlife Sanctuary. Death or injury from vehicle strikes could increase due to the presence of additional vehicles. Furthermore, wading birds such as Hawaiian stilts that utilize shallow detention basins for foraging and sheltering are consequently exposed to predation by feral predators such as cats (*Felis silvestris*), dogs (*Canis lupus familiaris*), and mongoose (*Herpestes javanicus*). We request an analysis of how the Federal Aviation Administration (FAA) will address, minimize, and mitigate for these potential impacts to Hawaiian stilts.

3. The information you provided does not adequately explain whether the proposed project will directly or indirectly impact the Hawaiian hoary bat. To ensure that the action is not likely to adversely affect Hawaiian hoary bats, removal of trees or shrubs over 15 feet in height should be proscribed during the bat breeding season (June 1 to September 15). This will avoid impacting any young pups that are left unattended in "nursery" trees and shrubs as the mother forages. Additionally, Hawaiian hoary bats have been documented becoming entangled and fatally injured on barbed wire fences during foraging flights. If barbed wire is to be installed on fencing as part of the proposed action, the FAA should provide the Service with an analysis of the potential impacts that the installation of barbed wire will have on the species. If vegetation removal is conducted out of the Hawaiian hoary bat breeding season and no barbed wire fences are proposed, then the proposed action would not likely adversely affect the Hawaiian hoary bat.

4. The Service also recommends that an assessment be conducted to address the potential impacts of invasive species introduction and transport due to the advent of construction-related materials and heavy vehicles into the action area during the construction phase of the proposed project. Accordingly, the Service can provide guidelines for invasive species containment and mitigation through Best Management Practices upon request.

At this time the Service does not concur with your determination that the proposed action is not likely to adversely affect listed species. If you have any questions regarding this consultation or the consultation process please contact Ian Bordenave, Fish and Wildlife Biologist, at (808) 792-9400 for further assistance.

Sincerely,

for Loyal Mehrhoff
Field Supervisor

7009 2250 0001 7965 5602

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DR LOYAL MEHRHOFF
FIELD SUPERVISOR
PACIFIC ISLANDS FISH & WILDLIFE SERVICE
P O BOX 50088
HONOLULU HI 96850

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X [signature] ☐ Agent ☐ Addressee

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U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Airports District Office

300 Ala Moana Blvd, Rm. 7-128
Honolulu, HI 96813
MAIL: Box 50244
Honolulu, HI 96850-0001
Telephone: (808) 541-1232
FAX: (808) 541-3566

CERTIFIED MAIL

February 22, 2013

Dr. Loyal Mehrhoff
Field Supervisor
Pacific Islands Fish and Wildlife Service
300 Ala Moana Boulevard, Room 3-122
P. O. Box 50088
Honolulu, Hawaii 96850

Subject: Proposed Consolidated Rental Car Facility & Airport Access Road Phase II Kahului Airport, Maui County, Hawaii; Section 106 Formal Consultation

Dear Dr. Mehrhoff:

The Federal Aviation Administration (FAA) received your letter dated January 16, 2013, requesting additional information to adequately assess the potential impacts to listed species that may result from implementation of the proposed projects at Kahului Airport. The FAA provides the following information in response to your request for additional information.

1. Potential Effects to Blackburn's Sphinx Moths

The U.S. Fish & Wildlife Service (USFWS) requested that additional surveys for the federally endangered Blackburn's sphinx moth be conducted during the wettest part of the year (typically November-April) and approximately four to eight weeks following a significant rainfall event. The USFWS requested additional surveys to increase the likelihood of detecting whether the Blackburn's sphinx moth are utilizing the areas to be affected by the proposed projects.

As requested, a follow-up survey was conducted on February 5, 2013, one month after the first significant rainfall event of the 2012-2013 wet season. A search of all areas that would be affected by the proposed Airport Access Road Phase II corridor, the consolidated rental car facility alternative sites, and the storm water detention basins was made to locate all plant species that are known to be the specific hosts for the Blackburn's sphinx moths during their egg laying and larval stages. These included their favorite host, the tree tobacco (*Nicotianaglauca*) as well as the cherry tomato (*Solanumlycoperiscum*) which had also been found during the 2012 survey. These host species were identified, counted, and mapped. Each individual was examined for the presence of moths, their eggs and larvae and for signs of larval feeding.

The presence of Blackburn's sphinx moths and their activities on their preferred host plants are not difficult to detect during the wet winter months. Conditions were close to ideal for such detection in the project area at the time this survey was conducted. The survey did not reveal any Blackburn's sphinx moth activity in any of the areas on a total of approximately 67 potential host plants. A copy of the survey findings is enclosed with this letter. Based on the results of the surveys conducted in June 2012, October 2012, and January 2013, no evidence of the Blackburn's sphinx moth utilizing the proposed project areas has been found.

2. Stormwater Detention Basins and Potential Effects to the Hawaiian Stilt

The USFWS requested additional information on how the proposed stormwater detention basins would be constructed and managed to minimize their attractiveness to the federally endangered Hawaiian stilt. The FAA has published guidance on minimizing potential features on airports that could attract wildlife that pose hazards to aircraft operations (FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants on or Near Airports*, August 28, 2007). The guidance recommends that for stormwater management facilities located on airports serving turbine-powered aircraft, the facilities be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and remain completely dry between storms. To facilitate the control of hazardous wildlife, the FAA recommends the use of steep-sided, rip-rap lined, narrow, and linearly shaped water detention basins. The stormwater detention basins proposed to be constructed as part of the consolidated rental car facility project are being designed to drain within a maximum 48-hour period and will have steep-sided slopes to prevent wildlife from utilizing these basins. If necessary, physical barriers, such as bird balls, wire grids, pillows, or netting, to prevent access of hazardous wildlife to open water and minimize aircraft-wildlife interactions may also be installed. With institution of these measures, the FAA believes that the attractiveness of the proposed stormwater detention basins to Hawaiian stilts will be minimal.

3. Potential Effects to the Hawaiian Hoary Bat

The USFWS has requested that FAA proscribe the removal of trees or shrubs greater than 15 feet in height during the breeding season of the federally endangered Hawaiian hoary bat (from June 1 through September 15) during construction of the proposed projects. The USFWS has also requested that the installation of barbed wire be prohibited as part of the implementation of the proposed projects. The FAA agrees to include both of these conditions as part of any approval associated with the proposed projects.

4. Assessment of Potential Impacts to Invasive Species Introduction and Transport Due to Construction

The USFWS has requested that an assessment of the potential impacts to invasive species introduction and transport due to the proposed construction activities be provided. The State of Hawaii Department of Agriculture has determined that the influx of invasive

species into the State has a substantial impact on Hawaii's fragile natural environment, has prioritized the pathways through which invasive species are transported, and has created a biosecurity program as a statewide mitigation plan to minimize the spread of invasive species in Hawaii. This biosecurity program, detailed in Act 236, SLH 2008, targets potential invasive species entering the State. All construction materials utilized on the project would be subject to invasive species inspection screening procedures already in place on Maui.

As stated in our letter of December 13, 2012, after reviewing the current status of these species, the effects of the proposed project, and proposed measures to avoid, minimize and compensate for effects to listed species, and designated critical habitat, the FAA has determined that the project ***may affect, but is not likely to adversely affect*** the Blackburn's sphinx moth or Hawaiian hoary bat.

The FAA seeks USFWS's concurrence with our determinations made pursuant to Title 50, Code of Federal Regulations Part 402, for the proposed project.

We request a response to this letter relative to Section 7 consultation requirements within 30 days of your receipt. If you have any questions or wish to further discuss this project, please do not hesitate to contact Gordon Wong at (808) 541-3565 or gordon.wong@faa.gov.

Sincerely,

Ronnie V. Simpson
Manager, Airports District Office

Enclosure
Biological Resources Survey for the Blackburn's Sphinx Moth Dated February 2013

cc: (w/encl.)
Kimberly Evans, HDOTA
Kevin Funasaki, Bowers + Kubota Consulting
Stephen Culberson, Ricondo & Associates, Inc.

BIOLOGICAL RESOURCES SURVEY FOR THE BLACKBURN'S SPHINX MOTH (Manduca blackburni) KAHULUI AIRPORT IMPROVEMENTS CONSOLIDATED RENTAL CAR FACILITY PROJECT KAHULUI, MAUI, HAWAII

By: Robert W. Hobdy
Environmental Consultant
Koakomo, Maui
February 2013

Prepared for: Ricondo & Associates, Inc.

INTRODUCTION

The Kahului Airport Improvements, Consolidated Rental Car Facility Project lies on two separate pieces of land, designated Site 4 (23 acres) and Site 5 (16.7 acres) (see Figure 1). Both sites are located on the west side of Kahului Airport Terminal on the eastern edge of Kahului Town. This report consists of a followup to a general environmental survey of Sites 4 and 5 which was conducted in June 2012. This followup report focuses on one aspect of the 2012 report relative to the Blackburn's sphinx moth, for which more information was deemed necessary.

SURVEY OBJECTIVES AND METHODS

It was determined by the reviewers of the 2012 report that a survey for the presence of the Endangered Blackburn's sphinx moth needed to be conducted during the wet winter months to get a more definitive assessment of this moth's activity within the project area. As a result a followup survey was conducted on February 5, 2013, one month after the first significant rainfall event, when the vegetation had greened up. A search of the entire areas of the proposed access road corridor route, Sites 4 & 5 and the storm water detention basins was made to locate all plant species that area known to be the specific hosts for the Blackburn's sphinx moths during their egg laying and larval stages. These included their favorite host, the tree tobacco (*Nicotiana glauca*) as well as the cherry tomato (*Solanum lycoperiscum*) which had also been found during the 2012 survey. These host species were identified, counted and mapped. Each individual was examined for the presence of moths, their eggs and larvae and for signs of larval feeding.

RESULTS

Small populations of tree tobacco plants were found in both Sites 4 and 5. Although two cherry tomato plants were found during the 2012 survey, none were found during this survey. No other potential host plants in the tomato family (*Solanaceae*) were present either.

The summer and fall months in the project area were extremely hot, dry and windy. This resulted in significant mortality of even drought-hardy plants that grow in the area. Many of the grasses, trees and shrubs that had been alive in June, 2012 were found standing dead in February, 2013. Recent winter rains had stimulated a flush of new growth in surviving tree tobacco plants and a wave of new seedlings of a diversity of other plant species was emerging.

Tree tobacco plants were identified, counted and mapped (see Figures 2&5). Each living specimen was then examined for eggs, larvae and feeding damage. The results are shown below.

<u>Site 4</u>

Just one living tree tobacco plant was found in the east-central portion of this area (see Figures 3&4). Examination of this shrubby specimen yielded no moths, eggs, larvae or feeding damage. An additional two dead tree tobacco plants were found in the northeast corner of this site.

Site 5

This 16.7 acre area lies in a slight depression closer to the Kahului Airport Terminal. The area has been extensively used as a stockpile for gravel and large blue-rock boulders. Wherever the boulders are stockpiled, tree tobacco trees have grown resulting in two populations, one with about 55 plants and a second with 11 plants. These living plants range in height between 8 feet and 20 feet (see figures 5-11). Each plant was examined for Blackburn's sphinx moth eggs, larvae or signs of feeding. No activity of any kind was detected on any of the plants in these two populations.

No tree tobacco plants or any other potential host plants were found in any other locations within the project area.

CONCLUSIONS

The presence of Blackburn's sphinx moths and their activities on their preferred host plants are not difficult to detect during the wet winter months. Conditions were close to ideal for such detection in Sites 4 and 5 of the Kahului Airport Improvements, Consolidated Rental Car Facility Project at the time this survey was conducted. This survey did not reveal any Blackburn's sphinx moth activity in any of the areas on a total of approximately 67 potential host plants.

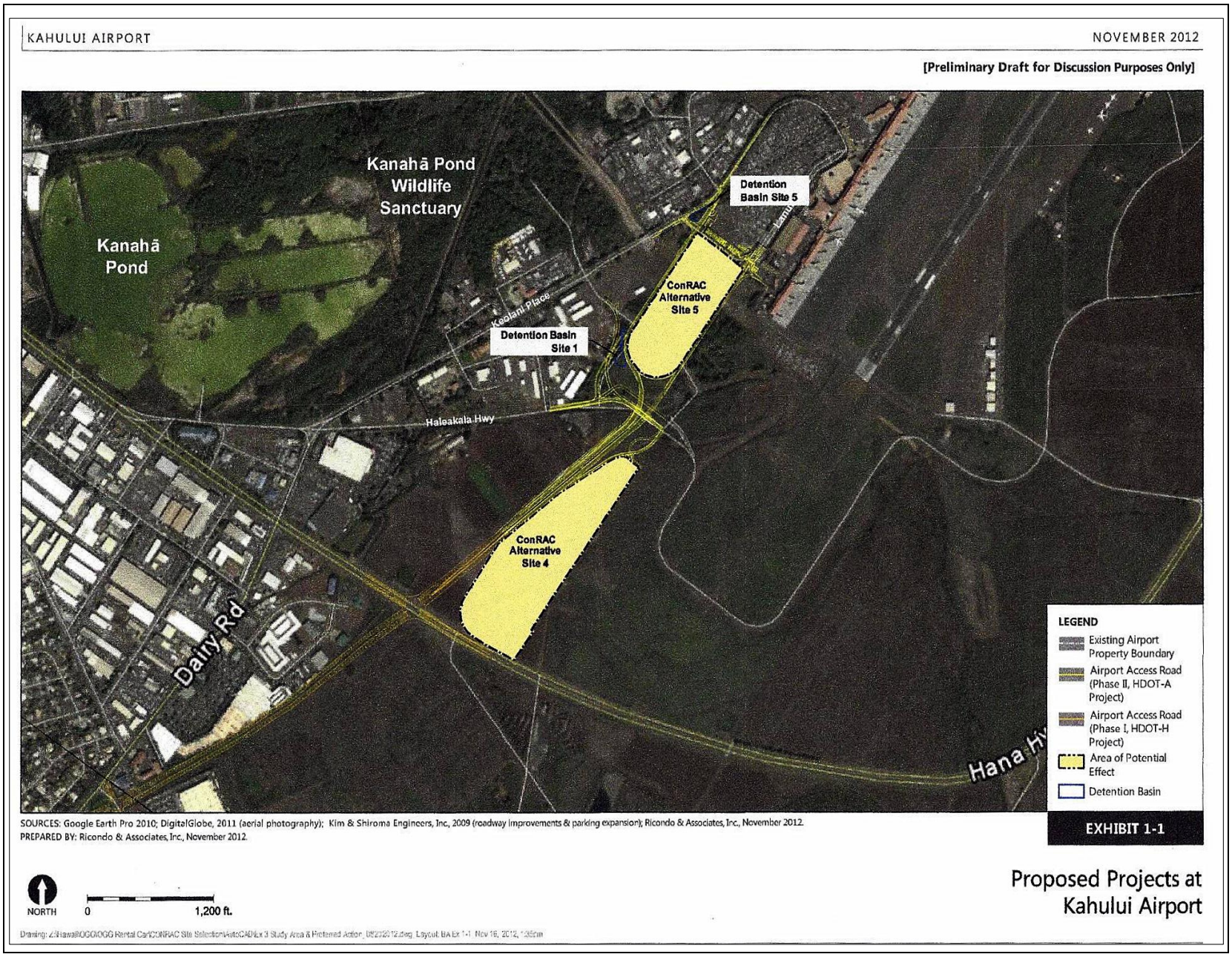


Figure 1 Project Map – Site Area 4 & 5

Figure 2 Site 4: with location of the single tree tobacco plant

Figure 3 – Site 4: The lone living tree tobacco plant in this site

Figure 4 – Site 4: A dead tree tobacco plant that did not survive the summer drought.

Figure 5 – Site 5: with the location of the approximately 66 tree tobacco plants

Figure 6 Site 5: Tree tobacco plants growing on stockpiled boulders

Figure 7 Site 5: The tobacco plants scattered among boulders

Figure 8 Site 5: Tree tobacco plants growing in a line of stockpiled boulders

Figure 9 Site 5: close-up of tree tobacco leaves and flowers.

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:
2013-I-0084

MAR 2 7 2013

Mr. Ronnie V. Simpson
Manager, Airports District Office
Federal Aviation Administration
300 Ala Moana Boulevard, Room 7-128
Honolulu, Hawaii 96813

Subject: Informal Consultation for the Proposed Kahului Airport Consolidated Rental Car Facility and Airport Access Road Phase II, Maui

Dear Mr. Simpson:

The U.S. Fish and Wildlife Service (Service) received your letter on February 25, 2013, requesting concurrence with your determination that the proposed construction of a Consolidated Rental Car Center and installation of Phase II of the proposed Airport Access Road may affect, but is not likely to adversely affect the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), Hawaiian stilt (*Himantopus mexicanus knudseni*), and Blackburn's sphinx moth (*Manduca blackburni*). This letter is in accordance with section 7 of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*).

The Federal Aviation Administration (FAA) is proposing to construct and operate a consolidated rental car facility at the Kahului Airport on the island of Maui. Also included in the proposed action is the construction of an adjacent second phase of the proposed airport access road. These improvements to airport infrastructure are outlined in the Kahului Airport Master Plan, and are designed to relieve traffic congestion and improve services at the Kahului Airport terminal facility. Based on information you provided and pertinent information in our files, there is no designated critical habitat within the proposed project area.

The following conservation measures will be implemented to avoid and minimize impacts to listed species within the project area. These conservation measures are considered part of the project description. Any changes to, modifications of, or failure to implement these conservation measures may result in the need to reinitiate this consultation.

The Hawaiian hoary bat roosts in both exotic and native woody vegetation and, while foraging, leaves young unattended in "nursery" trees and shrubs. If trees or shrubs suitable for bat roosting are cleared during the hoary bat breeding season (June 1 to September 15), there is a risk that young bats could inadvertently be harmed or killed. Additionally, bats have been documented becoming entangled and fatally injured on barbed wire fences during foraging flights. To ameliorate these threats, the Service recommends that woody plants greater than 15 feet tall should not be removed or trimmed during the hoary bat breeding season and that no barbed wire fences be installed. According to the project description, proposed fencing will be constructed with barbless wire. Moreover, the FAA has committed to not clear woody vegetation from June 1 to September 15 during the Hawaiian hoary bat breeding season.

The planned installation of stormwater detention basins in the project description may pose an attractive nuisance to the Hawaiian stilt. Wading birds (such as Hawaiian stilts) utilizing shallow detention basins for foraging and sheltering may be exposed to predation by feral predators such as cats (*Felis silvestris*), dogs (*Canis lupus familiaris*), and mongoose (*Herpestes javanicus*). The Hawaiian stilt may also be attracted to the detention basins as foraging habitat due to the close proximity of the proposed project site to the Kanaha Pond State Wildlife Sanctuary. Death or injury from vehicle strikes could result from Hawaiian stilt interactions with increased vehicle traffic at the adjacent Consolidated Rental Facility. The FAA has published guidance on minimizing potential features on airports that could attract wildlife and thus pose hazards to aircraft operations. The guidance recommends that stormwater management infrastructure located on airports be designed, constructed, and maintained for a maximum 48-hour detention period after a storm, and remain completely dry between storms. To mitigate the attractive nuisance that retention basins may pose to wildlife, the FAA recommends the use of steep-sided, rip-rap lined, narrow and linearly shaped water detention basins. Accordingly, the proposed stormwater detention basins are designed to drain within a 48-hour period and have the aforementioned physical features to reduce wildlife utilization. If necessary, physical barriers such as bird balls, wire grids, pillows, or netting may also be installed to minimize wildlife attraction.

According to documentation in our files, as well as information provided by the Hawaii Biodiversity and Mapping Program, the Blackburn's sphinx moth has been documented as occupying the vicinity of the project area year round. Surveys for the endangered Blackburn's sphinx moth were originally conducted at the proposed project site in June and October of 2012, without recording any presence of the species. To increase the potential for observation of the species when it occurs on site, the Service recommended that surveys for Blackburn's sphinx moth be conducted during the wettest portion of the year (usually November-April) and approximately four to eight weeks following a significant rainfall event. Looking for the species when host plants are green and lush increases the probability of detecting Blackburn's sphinx moth larvae, leaf chewing and other signs of larval feeding, frass, and eggs.

As requested, the FAA conducted an additional survey on February 5, 2013, approximately one month after a significant rainfall event. A search of all areas that would be affected by the proposed airport access road corridor, the proposed consolidated car rental facility sites, and the proposed stormwater detention basins was made to locate all plant species that are known to be specific larval hosts for the Blackburn's sphinx moth. Each plant was identified, counted, mapped and examined for the presence of the Blackburn's sphinx moth eggs and larvae, as well as for signs of larval feeding. The survey did not reveal any Blackburn's sphinx moth activity in any of the areas on a total of approximately 67 individual host plants.

In a telephone conversation on March 13, 2013, between Gordon Wong (FAA) and Ian Bordenave (Service), it was agreed that clearing work for the proposed project will not commence until after the dry season has concluded in order to allow pupating moths in the ground to emerge. Tree tobacco (*Nicotiana glauca*) plants will be cut down and treated with herbicide between October and November (after the hoary bat breeding season, but before the wet season) to preclude future larval foraging at the proposed project site.

The Service requested that an assessment be made of the potential impacts that invasive species introduction and transport may cause due to the proposed construction activities. According to your letter, the State of Hawaii Department of Agriculture (HDOA) has prioritized pathways through which invasive species are detected, and has created a state-wide biosecurity program as a mitigation plan to minimize the spread of invasive species in Hawaii. The program, detailed in Act 236, SLH 2008, targets potential invasive species entering the State. However, it is our understanding that the HDOA has been unable to fully implement the state-wide biosecurity program due in part to the reduction of force process that was put in effect at the end of 2009. While the Service agrees that all construction materials, tools, and vehicles utilized by the proposed project should be subject to invasive species inspection and screening procedures as outlined in the State biosecurity program, we feel that the lack of capacity to adequately address these procedures are problematic with the current number of remaining personnel at HDOA. We suggest that other biosecurity measures such as Hazard Analysis and Critical Control Point (HACCP) planning (see: //www.haccp-nrm.org) be developed and implemented to minimize the introduction of invasive species, and include control measures for invasive species incursions to prevent cumulative impacts on listed species as a result of this proposed project. To provide further assistance, Service personnel would be made available to review any HACCP planning documents that are developed for this project.

Due to the aforementioned conservation measures to avoid and minimize impacts to the endangered Hawaiian hoary bat, Hawaiian stilt, and the Blackburn's sphinx moth the Service concurs with your determination that the proposed project may affect, but is not likely to adversely affect, listed species. Unless the project description changes, or new information reveals that the proposed project may affect listed species in a manner or to an extent not considered, or a new species or critical habitat is designated that may be affected by the proposed action, no further action pursuant to section 7 of the ESA is necessary.

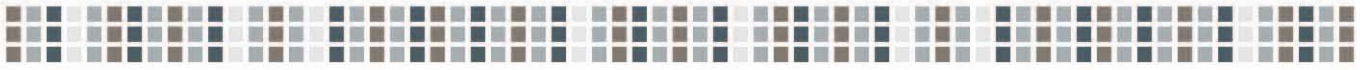
If you have questions regarding this informal consultation, please contact Ian Bordenave, Fish and Wildlife Biologist (phone: 808-792-9400, fax: 808-792-9581).

Sincerely,

for Loyal Mehrhoff
Field Supervisor

Appendix B

Botanical and Fauna Surveys



BOTANICAL AND FAUNA SURVEYS

CONSOLIDATED RENTAL CAR FACILITY SITES 4 & 5

KAHULUI AIRPORT, MAUI

by

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Prepared for:
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BOTANICAL AND FAUNA SURVEY
CONSOLIDATED RENTAL CAR FACILITY SITES 4 & 5
KAHULUI AIRPORT, MAUI

INTRODUCTION

The Kahului Airport Consolidated Rental Car Facility Project lies on two separate pieces of land on the west side of the airport terminal. Site 4, which is 23 acres in size abuts Hana Highway, while Site 5 which is 16.7 acres in size is alongside the terminal (see Figure 1). Both sites are located within the boundaries of Kahului Airport property on the east side of Kahului town. Both sites were assessed separately but are presented side by side in this report. This study was initiated by the State of Hawaii, Department of Transportation in fulfillment of environmental requirements of the planning process.

SITE DESCRIPTION

Site 4 is situated on 23 acres of former cane land on a hill between the elevations of 25 feet and 60 feet above sea level. The vegetation consists of a sparse cover of short, dry grasses (see Fig.2 & 3). The soil is classified as Molokai silty clay loam (Foot et al, 1972), a 6 to 8 foot deep soil which is underlain by a foundation of igneous rock. Annual rainfall averages about 20 inches (Armstrong, 1983).

Site 5 is situated on 16.7 acres of partially developed land between the Airport Terminal and A'alele Road. A few temporary structures occupy the north end, while the central and southern end consists of undeveloped forest and brush land (see Fig. 4 & 5). Kalialinui Stream channel runs underground past the south end of the runway and airport terminal through a 3,100 foot buried concrete aqueduct underneath this Site 5 area. The stream thus no longer has a direct hydrologic connection with the surrounding ground water hydrology here. Elevations at Site 5 range between 7 feet and 19 feet above sea level. The lowest elevation lies on the edge of the coastal plain along the now buried Kalialinui Stream channel. The soil is also Molokai silty clay loam, but differs from Site 4 in that the deep water table lies above the basal igneous rock level.

SITE HISTORY

Prior to 1880 this area was an open shrubland with native coastal plants and some sand dunes. In the early 1900s Site 4 was planted in sugar cane while Site 5 was colonized by kiawe forest.

During the 1940s there was a massive military build-up on Maui associated with World War II. Naval Air Station Kahului (NASKA) was built up to include airstrips, infrastructure and housing for nearly 6,000 military personnel. Site 4 remained in sugar cane but Site 5 was completely developed with structures. NASKA was decommissioned following the war in the late 1940s. NASKA was converted to a public airport in the early 1950s.

During the 1980s Kalialinui Stream was channelized for flood control purposes. A 100 foot wide by 6,000 foot long concrete aqueduct was constructed to carry flood waters past the Airport to the sea. As mentioned above, the upper 3,100 feet of this aqueduct was capped with concrete and buried underground. This aqueduct passes under Site 5.

Site 4 was taken out of sugar cane production in the late 1980s and has remained a dry grassland to the present.

SURVEY OBJECTIVES

This report summarizes the findings of a flora and fauna survey of the Consolidated Rental Car Facility project Sites 4 and Site 5 areas. The objectives of the survey were to:

1. Document what plant and animal species occur on the property or may likely occur in the existing habitat.
2. Document the status and abundance of each species.
3. Determine the presence or likely occurrence of any native flora and fauna, particularly any that are Federally listed as Threatened or Endangered. If such occur, identify what features of the habitat may be essential for these species.
4. Determine if the project area contains any special habitats which if lost or altered might result in a significant negative impact on the flora and fauna in this part of the island.

BOTANICAL SURVEY REPORT

SURVEY METHODS

A walk-through botanical survey method was used following routes to ensure that all parts of the project area were covered. Areas most likely to harbor native or rare plants such as gullys were more intensively examined. Notes were made on plant species, distribution and abundance as well as terrain and substrate.

DESCRIPTION OF THE VEGETATION

Both Sites 4 and 5 are significantly disturbed in both their terrain and their vegetation, Site 4 by agriculture and Site 5 by military use and by subsequent Kahului Airport development. Both sites have many of the same plant species, except that Site 5 has more diversity in shrubs and trees. Site 4 has been burned by wildfires a number of times in recent years.

Site 4 is a dry grassland dominated by one hardy species, buffelgrass (*Cenchrus ciliaris*) which grows throughout the entire area. Also common is Carolina lovegrass (*Eragrostis pectinacea*). A total of 33 plant species were recorded here. Just one native plant was found, the common, indigenous sub-shrub ʻuhaloa (*Waltheria indica*), which was sparsely represented. The remaining 32 plant species were non-native grasses and agricultural weeds.

Site 5 is more densely vegetated with grasses, shrubs, vines and trees. A total of 58 plant species were recorded here. Four non-native species were common, buffelgrass, Guinea grass (*Megathyrsus maximus*), koa haole (*Leucaena leucocephala*) and kiawe (*Prosopis pallida*). Six species were native to Hawaii, ʻuhaloa, ʻākulikuli (*Sesuvium portulacastrum*), ʻāheahea (*Chenopodium oahuense*), kipukai (*Heliotropium curassavicum*), kāʼeʼe (*Mucuna gigantea*) and ʻilima (*Sida fallax*). All six of these native species are common in Hawaii and five of them are also widespread in the tropical Pacific. Fifty two species were non-native plants.

DISCUSSION AND RECOMMENDATIONS

The vegetation throughout the project area consists primarily of non-native species with a few common native species scattered about. No Federally listed Threatened or Endangered species (USFWS, 1999) were found on the property nor were any found that are candidates for such status. No special habitats were found on the property either.

Because of the above existing conditions there is little of botanical concern on this property, and the proposed project is not expected to have a significant negative impact on the botanical resources in this part of Maui.

The only recommendation that is offered is that there are a number of native plants that might be incorporated into the landscape design that would lend a distinctive accent to the project. Ideas for appropriate species can be found in the Maui County Planting Plan or can be obtained from nursery growers who specialize in native plants.

PLANT SPECIES LIST

Following is a checklist of all those vascular plant species inventoried during the field studies. Plant families are arranged alphabetically within two groups: Monocots and Dicots. Taxonomy and nomenclature of the plants are in accordance with Wagner et al. (1999).

For each species, the following information is provided:

1. Scientific name with author citation
2. Common English or Hawaiian name.
3. Bio-geographical status. The following symbols are used:
   endemic = native only to the Hawaiian Islands; not naturally occurring anywhere else in the world.
   indigenous = native to the Hawaiian Islands and also to one or more other geographic area(s).
   Polynesian = those plants brought to the islands by the Polynesians in the course of their migrations.
   non-native = all those plants brought to the islands intentionally or accidentally after western contact.
4. Abundance of each species within the project area:
   abundant = forming a major part of the vegetation within the project area.
   common = widely scattered throughout the area or locally abundant within a portion of it.
   uncommon = scattered sparsely throughout the area or occurring in a few small patches.
   rare = only a few isolated individuals within the project area.

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE	
			Site 4	**Site 5**
MONOCOTS				
AGAVACEAE (Agave Family)				
Sanseviera trifasciata Prain	snake plant	non-native		rare
CYPERACEAE (Sedge Family)				
Cyperus rotundus L.	nut sedge	non-native		rare
POACEAE (Grass Family)				
Cenchrus ciliaris L.	buffelgrass	non-native	abundant	common
Chloris barbata (L.) Sw.	swollen fingergrass	non-native	rare	rare
Cynodon dactylon (L.) Pers.	Bermuda grass	non-native	rare	rare
Digitaria insularis (L.) Mez ex Ekman	sourgrass	non-native		rare
Eleusine indica (L.) Gaert.	wiregrass	non-native		rare
Eragrostis pectinacea (Michx.) Nees	Carolina lovegrass	non-native	common	rare
Megathyrsus maximus (Jacq.) Simon & Jacobs	Guinea grass	non-native	rare	common
DICOTS				
AIZOACEAE (Fig-marigold Family)				
Sesuvium portulacastrum (L.) L.	*'ākulikuli*	indigenous		rare
AMARANTHACEAE (Amaranth Family)				
Alternanthera pungens Kunth	khaki weed	non-native		uncommon
Amaranthus spinosus L.	spiny amaranth	non-native	uncommon	uncommon
Amaranthus viridis L.	slender amaranth	non-native		rare
Atriplex suberecta Verd.	saltbush	non-native	uncommon	uncommon
Calotropis procera (Aiton) Aiton	small crown flower	non-native		rare
Chenopodium murale L.	*'āheahea*	non-native		rare
Chenopodium oahuense (Meyen) Aellen	*'āheahea*	endemic		uncommon
APOCYNACEAE (Dogbane Family)				
Nerium oleander L.	oleander	non-native		uncommon
ASTERACEAE (Sunflower Family)				
Conyza bonariensis (L.) Cronq.)	hairy horseweed	non-native	rare	
Flaveria trinervia (Spreng.) C. Mohr	clustered yellowtops	non-native		rare
Lactuca sativa L.	prickly lettuce	non-native	rare	rare
Pluchea carolinensis (Jacq.) G.Don	sourbush	non-native	rare	rare
Pluchea indica (L.) Less.	Indian fleabane	non-native	rare	uncommon
Pluchea x fosbergii Cooperr & Galang	hybrid pluchea	non-native		rare
Sonchus oleraceus L.	*pualele*	non-native	rare	rare
Sphagneticola trilobata (L.) Pruski	wedelia	non-native		rare
Tridax procumbens L.	coat buttons	non-native	rare	uncommon
Verbesina encelioides (Cav.) Benth&Hook.	golden crown-beard	non-native	rare	uncommon
BORAGINACEAE (Borage Family)				
Heliotropium curassavicum L.	*kipukai*	indigenous		rare
Heliotropium procumbens Mill.	four-spike heliotrope	non-native	rare	rare
BRASSICACEAE (Mustard Family)				
Lepidium virginicum L.	Virginia pepperwort	non-native	rare	

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE	
			Site 4	**Site 5**
CLEOMACEAE (Cleome Family)				
Cleome gynandra L.	wild spider flower	non-native	rare	
CONVOLVULACEAE (Morning Glory Family)				
Ipomoea obscura (L.) Ker-Gawl.	----------	non-native	rare	uncommon
Merremia aegyptia (L.) Urb.	hairy merremia	non-native	rare	uncommon
CUCURBITACEAE (Gourd Family)				
Momordica charantia L.	bitter melon	non-native	rare	
EUPHORBIACEAE (Spurge Family)				
Euphorbia hirta L.	hairy spurge	non-native		uncommon
Euphorbia hypericifolia L.	graceful spurge	non-native		rare
Ricinus communis L.	Castor bean	non-native	uncommon	rare
FABACEAE (Pea Family)				
Cassia fistula L.	golden shower	non-native		rare
Cassia x nealiae Irwin & Barneby	rainbow shower	non-native		rare
Crotalaria incana L.	fuzzy rattlepod	non-native		rare
Crotalaria pallida Aiton	smooth rattlepod	non-native	uncommon	rare
Delonix regia (W.J.Hooker) Rafinesque	royal poinciana	non-native		rare
Desmanthus pernambucanus (L.) Thellung	slender mimosa	non-native		uncommon
Desmodium tortuosum (Sw.) DC.	Florida beggarweed	non-native		rare
Leucaena leucocephala (Lam.) de Wit	*koa haole*	non-native	uncommon	common
Macroptilium atropurpureum (DC.) Urb.	siratro	non-native		uncommon
Macroptilium lathyroides (L.) Urb.	wild bean	non-native	rare	
Mucuna gigantea (Willd.)DC. *subsp. gigantea*	*kā'e'e*	indigenous		rare
Neonotonia wightii (Wight & Arnott) Lackey	glycine	non-native		rare
Prosopis pallida (Humb.& Bonpl. ex Willd.) Kunth	kiawe	non-native	rare	common
Tephrosia sp.	----------	non-native		uncommon
LAMIACEAE (Mint Family)				
Leonotis nepetifolia (L.) R.Br.	lion's ear	non-native	rare	uncommon
MALVACEAE (Mallow Family)				
Abutilon grandifolium (Willd.) Sweet	hairy abutilon	non-native	rare	rare
Malva parviflora L.	cheese weed	non-native	uncommon	uncommon
Malvastrum coromandelianum (L.) Garcke	false mallow	non-native		uncommon
Sida fallax Walp.	*'ilima*	indigenous		rare
Sida rhombifolia L.	Cuban jute	non-native	rare	uncommon
Waltheria indica L.	*'uhaloa*	indigenous	uncommon	uncommon
NYCTAGINACEAE (Four-o'clock Family)				
Boerhavia coccinea Mill.	scarlet spiderling	non-native	rare	uncommon
PAPAVERACEAE (Poppy Family)				
Argemone mexicana L.	Mexican poppy	non-native		rare
SOLANACEAE (Nightshade Family)				
Nicotiana glauca R.C. Graham	tree tobacco	non-native	rare	uncommon
Solanum lycopersicum L.	cherry tomato	non-native	rare	rare

FAUNA SURVEY REPORT

SURVEY METHODS

A walk-through fauna survey method was conducted in conjunction with the botanical survey. All parts of the project area were covered. Field observations were made with the aid of binoculars and by listening to vocalizations. Notes were made on species, abundance, activities and location as well as observations of trails, tracks, scat and signs of feeding. In addition an evening visit was made to the area to record crepuscular activities and vocalizations and to see if there was any evidence of occurrence of the Hawaiian hoary bat (*Lasiurus cinereus semotus*) in the two areas.

RESULTS

MAMMALS

Five species of non-native mammals or their sign were observed during three site visits to these two areas. Taxonomy and nomenclature follow Tomich, 1986. These included feral cats (*Felis catus*), axis deer (*Axis axis*), dog (*Canis familiaris*), mouse (*Mus domesticus*) and rat (*Rattus* spp.). All five species were of rare occurrence in this dry environment and of little interest or concern.

A special effort was made to look for any occurrence of the endemic and endangered Hawaiian hoary bat by making an evening survey in these two areas. When present in an area these bats can be easily identified as they forage for insects, their distinctive flight patterns clearly visible in the glow of twilight. No evidence of such activity was observed though visibility was excellent. In addition an electronic bat detector (Batbox IIID) was utilized, set to the frequency of 27,000 hertz that these bats are known to use for echolocation. No bats were detected using this device.

BIRDS

Fourteen species of non-native birds were observed during three site visits. Taxonomy and nomenclature follow American Ornithologists' Union, 2011. Of common occurrence were zebra dove (*Geopelia striata*), nutmeg mannikin (*Lonchura punctulata*), house sparrow (*Passer domesticus*), gray francolin (*Francolinus pondicerianus*) and spotted dove (*Streptopelia chinensis*). The nine other species were of uncommon or rare occurrence. No native forest birds including any endangered waterbirds, were seen or would be expected in this dry habitat. A few other non-native birds such as the cattle egret (*Bubulcus ibis*), northern cardinal (*Cardinalis cardinalis*), Java sparrow (*Padda oryzivora*) and Japanese white-eye (*Zosterops japonicus*) would be occasional visitors to these areas.

INSECTS

Insect life was sparse in these two dry sites. Taxonomy and nomenclature follow Nishida et al, 1992. Site 4, in particular was nearly devoid of observable insects. Only a few of the hardy short-horned grasshoppers (*Qedaleus abruptus*) were seen. The sparse growth of dry grass was not conducive to diversity of insects.

Site 5 showed more diversity with a total of 13 non-native species among seven insect orders. Four species were common, monarch butterfly (*Danaus plexippus*), cabbage butterfly (*Pieris rapae*), Castor semilooper (*Achaea janata*) and the dung fly (*Musca sorbens*). The remaining nine species were uncommon to rare.

The endemic and endangered Blackburns sphinx moth (USFW, 2000) has been known to occur in the immediate vicinity of Sites 4 and 5 but was not observed during the survey. This large moth has developed an alternative host plant relationship with the non-native tree tobacco (*Nicotiana glauca*) which is playing a role in the moth's survival and recovery. Several tree tobacco plants were seen in both Sites 4 and 5. Examinations of these plants failed to find any eggs or larvae of the moth, although such activity is usually confined to the winter and early spring months when moisture and rapid plant growth are occurring. The pupae of these moths, however, may be present in the soil and leaf litter below the tree tobacco plants where they migrate after their larvae mature and enter the pupal stage where they would remain until emerging as adults at the onset of the next wet season.

REPTILES

Just one common, non-native reptile, the mourning gecko (*Lepidodactylus lugubris*) was heard calling during the evening survey in Site 5.

ANIMAL SPECIES LIST

Following is a checklist of the animal species inventoried during the field work. Animal species are arranged in descending abundance within two groups: Mammals and Birds. For each species the following information is provided:

1. Common name
2. Scientific name
3. Bio-geographical status. The following symbols are used:
   - endemic = native only to Hawaii; not naturally occurring anywhere else in the world.
   - indigenous = native to the Hawaiian Islands and also to one or more other geographic area(s).
   - non-native = all those animals brought to Hawaii intentionally or accidentally after western contact.
   - migratory = spending a portion of the year in Hawaii and a portion elsewhere. In Hawaii the migratory birds are usually in the overwintering/non-breeding phase of their life cycle.

4. Abundance of each species within the project area:
   - abundant = many flocks or individuals seen throughout the area at all times of day.
   - common = a few flocks or well scattered individuals throughout the area.
   - uncommon = only one flock or several individuals seen within the project area.
   - rare = only one or two seen within the project area.

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE	
			Site 4	**Site 5**
MAMMALS				
Axis axis Erxleben	Axis deer	non-native	rare	rare
Felis catus L.	Cat	non-native		rare
Canis familiaris L.	Dog	non-native	rare	
Mus domesticus L.	Mouse	non-native	rare	
Rattus spp.	Rat	non-native	rare	
BIRDS				
Geopelia striata L.	Zebra dove	non-native	common	rare
Lonchura punctulata L.	Nutmeg mannikin	non-native	common	
Passer domesticus L.	House sparrow	non-native		common
Francolinus pondicerianus Gmelin	Gray francolin	non-native	uncommon	common
Streptopelia chinensis Scopoli	Spotted dove	non-native		common
Carpodacus mexicanus Muller	House finch	non-native	rare	uncommon
Lonchura malacca L.	Chestnut mannikin	non-native	uncommon	
Lonchura cantans Gmelin	African silverbill	non-native	uncommon	
Francolinus francolinus L.	Black francolin	non-native	uncommon	
Paroaria coronata Miller	Red-crested cardinal	non-native		rare
Alauda arvensis L.	Sky lark	non-native	rare	
Acridotheres tristis L.	Common myna	non-native	rare	rare
Tyto alba Scopoli	Barn owl	non-native		rare
Mimus polyglottos L.	Northern mockingbird	non-native		rare

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE	
			Site 4	**Site 5**
INSECTS				
Order ARANAE - true spiders				
ARANEIDAE (Orb Weaver Spider Family)				
Argiope appensa Walkenear	Common garden spider	non-native		rare
Gasteracanthus mammosa Koch	Asian spiny backed spider	non-native		uncommon
Order DIPTERA - flies				
MUSCIDAE (House Fly Family)				
Musca sorbens Wiedemann	Dung fly	non-native		common
Order HYMENOPTERA - bees, wasps & ants				
APIDAE (Honey Bee Family)				
Xylocopa sonorina Smith	Sonoran carpenter bee	non-native		uncommon
Order ISOPODA - sow bugs				
PORCELLIONIDAE (Sow Bug Family)				
Porcellio laevis Latreille	Sow bug	non-native		uncommon
Order LEPIDOPTERA - butterflies & moths				
LYCAENIDAE (Gossamer Winged Butterfly Family)				
Brephidium exilis Boisduval	Western pygmy blue	non-native		rare
Lampides boeticus L.	Long tail blue	non-native		uncommon
NOCTUIDAE (Owlet Moth Family)				
Achaea janata L.	Castor semilooper	non-native		common
NYMPHALIDAE (Brush-footed Butterfly Family)				
Danaus plexippus L.	Monarch butterfly	non-native		common
PIERIDAE (White and Sulphur Butterfly Family)				
Pieris rapae L.	Cabbage butterfly	non-native		common
Order MANTODEA _ mantises				
MANTIDAE (Praying Mantis Family)				
Tenodera angustipennis Saussure	Praying mantis	non-native		rare
Order ORTHOPTERA - grasshoppers & crickets				
ACRIDIDAE (Grasshopper Family)				
Oeadaleus abruptus Thunberg	Short-horned grasshopper	non-native	uncommon	uncommon
Schistocerca nitens Thunberg	Gray bird grasshopper	non-native		uncommon

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE	
REPTILES			**Site 4**	**Site 5**
GEKKONIDAE (Gecko Lizard Family)				
Lepidodactylus lugubris Dumeril & Bibron	Mounring gecko	non-native		rare

Figure 1 Project Areas Site 4 (23 acres) and Site 5 (16.7 acres)

Figure 2 - Site 4 looking southwest toward Hana Hwy.

Figure 3 - Site 4 looking northeast towards airport

Figure 4 - Site 5 Grassland with brush

Figure 5 - Site 5 Dense brush and forest

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BOTANICAL AND FAUNA SURVEYS

KAHULUI AIRPORT CORRIDOR & DETENTION BASINS 1 & 5

KAHULUI, MAUI

by

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October 2012

Prepared for:
Ricondo & Associates

BOTANICAL AND FAUNA SURVEY
KAHULUI AIRPORT CORRIDOR & DETENTION BASINS 1 & 5
KAHULUI AIRPORT, MAUI

INTRODUCTION

The Kahului Airport Corridor project is located on the east side of Kahului, Maui and extends approximately one mile from Hana Highway to Kahului Airport, providing an improved access route to the Terminal entrance. The route splits into entrance and exit lanes that connect with the existing Lanui Circle Drive that accesses the Terminal. Two water detention basins adjacent to the route, are included in the project design (see Figures 1-2). This biological survey and assessment of the botanical and fauna resources in this project area was initiated in fulfillment of environmental requirements of the planning process.

SITE DESCRIPTION

The road corridor begins on Hana highway about 0.25 miles east of the Dairy Road intersection, travels northeast across former sugar cane land, over a low hill and curves north to the Kahului Airport Terminal (see Figures 3-4). The vegetation on the first portion consists of a sparse cover of short, dry grasses, while the portion approaching the Terminal crosses uneven terrain with a more diverse array of trees, shrubs and grasses (see Figures 5-6). Elevations range between 25 feet and 60 feet above sea level. Soils are classified as Molokai silty clay loam, a 6 to 8 feet deep soil over a layer of solid igneous rock (Foote et al, 1972). Annual rainfall averages about 20 inches (Armstrong, 1983). The runoff Detention Basins 1 and 5 are small areas adjacent to the northern corridor. Detention Basin 5 is presently a landscaped area on Kahului Airport property (see Figures 7-8).

SITE HISTORY

Prior to 1880 this area was an open shrubland with native coastal and dry land plants. In the early 1900s the southern portion was planted in sugar cane while the northern portion was colonized by kiawe forest.

During the 1940s there was a massive military build-up on Maui associated with World War II. Naval Air Station Kahului (NASKA) was built up to include airstrips, infrastructure and housing for nearly 6,000 military personnel. This area was completely developed with structures. NASKA was decommissioned following the war in the late 1940s. NASKA was converted to a public airport in the early 1950s.

During the 1980s Kalialinui stream bed was channelized for flood control purposes. A 100 foot wide by 6,000 foot long concrete aqueduct was constructed to carry flood waters past the Airport to the sea. The upper 3,100 feet of this aqueduct was capped with concrete and buried underground. This aqueduct passes under the corridor just south of the Terminal.

The southern part of the corridor was taken out of sugar cane production in the late 1980s and has remained a dry grassland to the present.

SURVEY OBJECTIVES

This report summarizes the findings of a flora and fauna survey of the Kahului Airport Corridor and Detention Basins 1 and 5 areas. The objectives of the survey were to:

1. Document what plant and animal species occur on the property or may likely occur in the existing habitat.
2. Document the status and abundance of each species.
3. Determine the presence or likely occurrence of any native flora and fauna, particularly any that are Federally listed as Threatened or Endangered. If such occur, identify what features of the habitat may be essential for these species.
4. Determine if the project area contains any special habitats which if lost or altered might result in a significant negative impact on the flora and fauna in this part of the island.

BOTANICAL SURVEY REPORT

SURVEY METHODS

A walk-through botanical survey method was used following routes to ensure that all parts of the project area were covered. Areas most likely to harbor native or rare plants such as gullys were more intensively examined. Notes were made on plant species, distribution and abundance as well as terrain and substrate.

DESCRIPTION OF THE VEGETATION

The project area consists mostly of open grassland in the southern portion of the highway corridor. The northern portion, where the corridor splits to form the Lanui Circle at the Terminal entrance, consists of a variety of grasses, shrubs and trees. Most of the plant species are non-native weeds typical of disturbed and abandoned agricultural lands. A total of 54 plant species were recorded during the survey. Just one species, buffelgrass (*Cenchrus ciliaris*) was found to be common throughout the project area. The remaining 53 species were of uncommon or rare occurrence.

Three plant species were native to Hawaii, including the endemic ʻāheahea (*Chenopodium oahuense)* which occurs naturally only in Hawaii, and the alena (*Boerhavia repens*) and the ʻuhaloa (*Waltheria indica*) which are found in Hawaii as well as on other Pacific islands. All three species are widespread and common in Hawaii and are not of any particular conservation concern.

DISCUSSION AND RECOMMENDATIONS

The vegetation throughout the project area consists primarily of non-native species with a few common native species scattered about. No Federally listed Threatened or Endangered species (USFWS, 1999) were found on the property nor were any found that are candidates for such status. No special habitats were found on the property either.

Because of the above existing conditions there is little of botanical concern on this property, and the proposed project is not expected to have a significant negative impact on the botanical resources in this part of Maui.

The only recommendation that is offered is that there are a number of native plants that might be incorporated into the landscape design that would lend a distinctive accent to the project. Ideas for appropriate species can be found in the Maui County Planting Plan or can be obtained from nursery growers who specialize in native plants.

PLANT SPECIES LIST

Following is a checklist of all those vascular plant species inventoried during the field studies. Plant families are arranged alphabetically within two groups: Monocots and Dicots. Taxonomy and nomenclature of the plants are in accordance with Wagner et al. (1999).

For each species, the following information is provided:

1. Scientific name with author citation
2. Common English or Hawaiian name.
3. Bio-geographical status. The following symbols are used:
   endemic = native only to the Hawaiian Islands; not naturally occurring anywhere else in the world.
   indigenous = native to the Hawaiian Islands and also to one or more other geographic area(s).
   Polynesian = those plants brought to the islands by the Polynesians in the course of their migrations.
   non-native = all those plants brought to the islands intentionally or accidentally after western contact.
4. Abundance of each species within the project area:
   abundant = forming a major part of the vegetation within the project area.
   common = widely scattered throughout the area or locally abundant within a portion of it.
   uncommon = scattered sparsely throughout the area or occurring in a few small patches.
   rare = only a few isolated individuals within the project area.

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE
MONOCOTS			
ARECACEAE (Palm Family)			
Cocos nucifera L.	niu, coconut	Polynesian	uncommon
Dypsis lutescens (Wendland) Beentje & Dransfield	golden-fruited palm	non-native	rare
CYPERACEAE (Sedge Family)			
Kyllinga brevifolia Rottb.	kili'o'opu	non-native	rare
POACEAE (Grass Family)			
Bothriochloa bladhii (Retz.) Blake	----------	non-native	rare
Bothriochloa pertusa (L.) Blake	pitted beardgrass	non-native	rare
Cenchrus ciliaris L.	buffelgrass	non-native	common
Cenchrus echinatus L.	common sandbur	non-native	rare
Cenchrus purpureus (Schumacher) Morrone	Napier grass	non-native	rare
Chloris barbata (L.) Sw.	swollen fingergrass	non-native	rare
Cynodon dactylon (L.) Pers.	Bermuda grass	non-native	rare
Eragrostis pectinacea (Michx.) Nees	Carolina lovegrass	non-native	uncommon
Megathyrsus maximus (Jacq.) Simons & Jacobs	Guinea grass	non-native	uncommon
Melinis repens (Willd.) Zizka	Natal redtop	non-native	rare
Paspalum conjugatum Bergius	Hilo grass	non-native	rare
Setaria verticillata (L.) P. Beauv.	bristly foxtail	non-native	rare
Zoysia matrella L.	zoysia grass	non-native	rare
DICOTS			
AMARANTHACEAE (Amaranth Family)			
Alternanthera pungens Kunth	khaki weed	non-native	rare
Amaranthus spinosus L.	spiny amaranth	non-native	uncommon
Atriplex suberecta Verd.	saltbush	non-native	uncommon
Chenopodium murale L.	'āheahea	non-native	rare
Chenopodium oahuense	'āheahea	endemic	rare
APIACEAE (Parsley Family)			
Centella asiatica (L.) Urb.	Asiatic pennywort	non-native	rare
ASTERACEAE (Sunflower Family)			
Pluchea carolinensis (Jacq.) G. Don	sourbush	non-native	uncommon
Pluchea indica (L.) Less.	Indian fleabane	non-native	rare
Sonchus oleraceus L.	pualele	non-native	rare
Sphagneticola trilobata (L.) Pruski	wedelia	non-native	rare
Tridax procumbens L.	coat buttons	non-native	rare
Verbesina encelioides (Cav.) Benth. & Hook.	golden crown-beard	non-native	uncommon
BORAGINACEAE (Borage Family)			
Heliotropium procumbens Mill.	four-spike heliotrope	non-native	rare
CONVOLVULACEAE (Morning Glory Family)			
Ipomoea obscura (L.) Ker-Gawl.	----------	non-native	uncommon

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE
EUPHORBIACEAE (Spurge Family)			
Ricinus communis L.	Castor bean	non-native	uncommon
FABACEAE (Pea Family)			
Alysicarpus vaginalis (L.) DC.	alyce clover	non-native	rare
Cassia fistula L.	golden shower	non-native	rare
Desmanthus pernambucanus (L.) Thellung	slender mimosa	non-native	uncommon
Desmodium tortuosum (Sw.) DC.	Florida beggarweed	non-native	uncommon
Indigofera hendecaphylla Jacq.	creeping indigo	non-native	uncommon
Leucaena leucocephala (Lam.) de Wit	koa haole	non-native	uncommon
Macroptilium atropurpureum (DC.) Urb.	siratro	non-native	rare
Neonotonia wightii (Wight & Arnott) Lackey	glycine	non-native	rare
Prosopis pallida (Humb. & Bonpl. ex Willd.) Kunth	kiawe	non-native	uncommon
LAMIACEAE (Mint Family)			
Leonotis nepetifolia (L.) R.Bn.	lion's ear	non-native	rare
MALVACEAE (Mallow Family)			
Abutilon grandifolium (Willd.) Sweet	hairy abutilon	non-native	rare
Hibiscus rosa sinensis L.	Chinese red hibiscus	non-native	rare
Malvastrum coromandelianum (L.) Garcke	false mallow	non-native	rare
Sida ciliaris L.	red 'ilima	non-native	rare
Sida rhombifolia L.	Cuban jute	non-native	uncommon
Sida spinosa L.	prickly sida	non-native	rare
Waltheria indica L.	'uhaloa	indigenous	uncommon
NYCTAGINACEAE (Four-o'clock Family)			
Boerhavia coccinea Mill.	scarlet spiderling	non-native	uncommon
Boerhavia repens L.	alena	indigenous	rare
PASSIFLORACEAE (Passion Flower Family)			
Passiflora foetida L.	love-in-a-mist	non-native	uncommon
RUBIACEAE (Coffee Family)			
Spermacoce assurgens Ruiz & Pav.	buttonweed	non-native	rare
SOLANACEAE (Nightshade Family)			
Nicandra physalodes (L.) Gaertn.	apple of Peru	non-native	rare
Nicotiana glauca R.C. Graham	tree tobacco	non-native	uncommon

FAUNA SURVEY REPORT

SURVEY METHODS

A walk-through fauna survey method was conducted in conjunction with the botanical survey. All parts of the project area were covered. Field observations were made with the aid of binoculars and by listening to vocalizations. Notes were made on species, abundance, activities and location as well as observations of trails, tracks, scat and signs of feeding. In addition an evening visit was made to the area to record crepuscular activities and vocalizations and to see if there was any evidence of occurrence of the Hawaiian hoary bat (*Lasiurus cinereus semotus*) in the area.

RESULTS

MAMMALS

Two species of mammals were recorded during the fauna survey. Taxonomy and nomenclature follow Tomich (1986). One feral cat (*Felis catus*) was seen during the evening survey hunting for rodents in the grassland near the airport. Other common non-native mammals which were not seen, but which would be expected to be present include species of rats (*Rattus* spp.) and mice (*Mus domesticus*) as well as the carnivorous mongoose (*Herpestes auropunctatus*).

Also during the evening survey a special effort was made to look for any occurrence of the endemic and Endangered Hawaiian hoary bat by looking for them visually at twilight and by employing the use of a bat detector (Batbox IIID) after dark, set to the frequency of 27,000 Hertz that these bats are known to use for echolocation. No bats were seen at twilight even though visibility was excellent. Later on, however, following darkness, vocalizations of at least one bat were clearly detected, sometimes at quite close range, as it made foraging passes in search of airborne insects, primarily nocturnal moths. This activity was followed closely for over 15 minutes.

BIRDS

Just six species of non-native birds were recorded during the fauna survey. Abundant human activity associated with the adjacent Airport Terminal as well as a nearby construction project no doubt contributed to decreased birdlife in the project area. Taxonomy and nomenclature follow American Ornithologists' Union (2011). Only one bird species, the zebra dove (*Geopelia striata*), was common throughout the area. Somewhat less common was the gray francolin (*Francolinus pondicerianus*). Four other species were rare. A few other common, non-native bird species such as the cattle egret (*Bubulcus ibis*), northern cardinal (*Cardinalis cardinalis*), Java sparrow (*Padda oryzivora*) and Japanese white-eye (*Zosterops japonicas*) would be occasional visitors. No native forest birds or waterbirds were seen or would be expected in this lowland dry habitat.

INSECTS

Insect life was somewhat sparse in this dry area. Taxonomy and nomenclature follow Nishida et al (1992). The south part of the project area was nearly devoid of observable insects. Only the hardy short-horned grasshopper (*Odaleus abruptus*) was common here. The sparse growth of dry grass was not conducive to diversity of insects.

The northern part of the project area showed more diversity with a total of 13 mostly non-native species spread among 6 insect Orders. Four species were found to be common, the honey bee (*Apis mellifera*), the Sonoran carpenter bee (*Xylocopa sonorina*), the long-tailed blue butterfly (*Lampides boeticus*) and the short-horned grasshopper. The remaining 9 species were uncommon to rare. One widespread, indigenous dragonfly, the globe skimmer was seen.

The endemic and Endangered Blackburn's sphinx moth (*Manduca blackburni*) (USFWS, 2000) has been known to occur in the immediate vicinity of the project area but was not observed during the survey. This large moth has developed an alternative host relationship with the non-native tree tobacco (*Nicotiana glauca*) which is playing a role in the moth's survival and recovery (see Figures 9-10). About 60 tree tobacco plants were seen in the northern part of the project area. Examination of these plants failed to find any eggs or larvae of the moth, although such activity is usually confined to the winter and early spring months when rainfall and rapid plant growth are occurring. The pupae of these moths, however, may be present in the soil and leaf litter below the tree tobacco plants where the larvae migrate at maturity to enter this pupal stage and where they would remain until emerging as adult moths at the onset of the next wet season.

REPTILES & MOLLUSKS

No reptiles or mollusks were seen during the survey.

DISCUSSION AND RECOMMENDATIONS

The fauna survey of the Kahului Airport Access Corridor found 2 species of mammals, 6 species of birds and 13 species of insects. Of these just the Endangered Hawaiian hoary bat and the globe skimmer dragonfly were native to Hawaii.

The behavior and lifestyle of the Hawaiian hoary bat are imperfectly understood. Their nocturnal activity, their solitary, non-colonial social life, their tiny size and their cryptic, inactive diurnal state make them difficult to study. We are only now learning something about their night ranging and seasonal movements. These bats appear to be quite mobile. They have been documented in a wide range of habitats from sea level to high in the mountains, and they appear to be more widespread and less rare than previously thought. It is perhaps not unusual that these bats would occasionally show up in this project area.

Nonetheless, they are currently listed as an Endangered species with federal protections associated with this status. It is recommended that the U.S. Fish and Wildlife Service be consulted to work out appropriate measures that will assure that these bats will not be harmed.

The globe skimmer dragonfly is indigenous to the Hawaiian Islands but is also known to occur throughout the tropics worldwide. It is thus widespread and common. It is of no particular conservation interest of concern.

As discussed above, there is a real likelihood that pupae of the Endangered Blackburn's sphinx moth may currently be present in the soil and leaf litter beneath the approximately 60 tree tobacco plants that are located in the northern portion of the project area, even though no moths, their eggs or larvae were found during the fauna survey. Again, it is recommended that the U.S. Fish and Wildlife Service be consulted to outline procedures that would ensure that no harm is done to these protected moths as this project moves forward.

ANIMAL SPECIES LIST

Following is a checklist of the animal species inventoried during the field work. Animal species are arranged in descending abundance within two groups: Mammals and Birds. For each species the following information is provided:

1. Common name
2. Scientific name
3. Bio-geographical status. The following symbols are used:
   - endemic = native only to Hawaii; not naturally occurring anywhere else in the world.
   - indigenous = native to the Hawaiian Islands and also to one or more other geographic area(s).
   - non-native = all those animals brought to Hawaii intentionally or accidentally after western contact.
   - migratory = spending a portion of the year in Hawaii and a portion elsewhere. In Hawaii the migratory birds are usually in the overwintering/non-breeding phase of their life cycle.

4. Abundance of each species within the project area:
   - abundant = many flocks or individuals seen throughout the area at all times of day.
   - common = a few flocks or well scattered individuals throughout the area.
   - uncommon = only one flock or several individuals seen within the project area.
   - rare = only one or two seen within the project area.

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE
MAMMALS			
Felis catus L.	feral cat	non-native	rare
Lasiurus cinereus semotus	'ōpe'ape'a, Hawaiian bat	endemic	rare
BIRDS			
Geopelia striata L.	zebra dove	non-native	common
Francolinus pondicerianus Gmelin	gray francolin	non-native	uncommon
Acridotheres tristis L.	common myna	non-native	rare
Streptopelia chinensis Scopoli	spotted dove	non-native	rare
Passer domesticus L.	house sparrow	non-native	rare
Pluvialis fulva Gmelin	kōlea, Pacific golden-plover	migratory	rare

SCIENTIFIC NAME	COMMON NAME	STATUS	ABUNDANCE
INSECTS			
Order DIPTERA - flies			
MUSCIDAE (House Fly Family)			
Musca sorbens Wiedemann	dung fly	non-native	rare
Order HYMENOPTERA - bees, wasps & ants			
APIDAE (Honey Bee Family)			
Apis mellifera L.	honey bee	non-native	common
Xylocopa sonorina Smith	Sonoran carpenter bee	non-native	common
FORMICIDAE (Ant Family)			
Pheidole megacephala Fabricius	big-headed ant	non-native	rare
VESPIDAE (Vespid Wasp Family)			
Polistes aurifer Saussure	golden paper wasp	non-native	rare
Order LEPIDOPTERA - butterflies & moths			
HESPERIIDAE (Skipper Butterfly Family)			
Erionota thrax L.	banana leaf roller	non-native	rare
Hylephila phyleus Drury	fiery skipper	non-native	rare
LYCAENIDAE (Gossamer-winged Butterfly Family)			
Lampides boeticus L.	long-tailed blue butterfly	non-native	common
NYMPHALIDAE (Brush-footed Butterfly Family)			
Agraulis vanillae L.	passion flower butterfly	non-native	uncommon
Danaus plexippus L.	monarch butterfly	non-native	rare
PIERIDAE (White and Sulphur Butterfly Family)			
Pieris rapae L.	cabbage butterfly	non-native	rare
Order ODONATA - dragonflies & damselflies			
LIBELLULIDAE (Skimmer Dragonfly Family)			
Pantala flavescens Fabricius	globe skimmer	indigenous	rare
Order ORTHOPTERA - grasshoppers & crickets			
ACRIDIDAE (Grasshopper Family)			
Oedaleus abruptus Thunberg	short-horned grasshopper	non-native	common

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[Preliminary Draft for Discussion Purposes Only]

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements & parking expansion); Ricondo & Associates, Inc., September 2012.
PREPARED BY: Ricondo & Associates, Inc., September 2012.

Area of Potential Effect

Figure 1 Project Area extending from Hana Highway to Kahului Airport

Figure 2 Airport Access Corridor connecting with Lanui Circle at Kahului Airport Terminal Water Detention Basins 1 and 5.

Figure 3 Kahului Airport Access Corridor beginning point along Hana Highway.

Figure 4 Kahului Airport Access Corridor looking south from the center of the project area.

Figure 5 Northern portion of Kahului Airport Access Corridor showing entrance route Toward Lanui Circle.

Figure 6 Northern portion of Kahulu Airport Access Corridor showing exit route from Lanui Circle.

Figure 7 Proposed site for Water Detention Basin 1.

Figure 8 Proposed site for Water Detention Basin 5.

Figure 9 Tree tobacco plants along the northern portion of the Kahului Airport Access Road.

Figure 10 Tree tobacco plant

BIOLOGICAL RESOURCES SURVEY FOR THE BLACKBURN'S SPHINX MOTH (Manduca blackburni) KAHULUI AIRPORT IMPROVEMENTS CONSOLIDATED RENTAL CAR FACILITY PROJECT KAHULUI, MAUI, HAWAII

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February 2013

Prepared for: Ricondo & Associates, Inc.

INTRODUCTION

The Kahului Airport Improvements, Consolidated Rental Car Facility Project lies on two separate pieces of land, designated Site 4 (23 acres) and Site 5 (16.7 acres) (see Figure 1). Both sites are located on the west side of Kahului Airport Terminal on the eastern edge of Kahului Town. This report consists of a followup to a general environmental survey of Sites 4 and 5 which was conducted in June 2012. This followup report focuses on one aspect of the 2012 report relative to the Blackburn's sphinx moth, for which more information was deemed necessary.

SURVEY OBJECTIVES AND METHODS

It was determined by the reviewers of the 2012 report that a survey for the presence of the Endangered Blackburn's sphinx moth needed to be conducted during the wet winter months to get a more definitive assessment of this moth's activity within the project area. As a result a followup survey was conducted on February 5, 2013, one month after the first significant rainfall event, when the vegetation had greened up. A search of the entire areas of the proposed access road corridor route, Sites 4 & 5 and the storm water detention basins was made to locate all plant species that area known to be the specific hosts for the Blackburn's sphinx moths during their egg laying and larval stages. These included their favorite host, the tree tobacco (*Nicotiana glauca*) as well as the cherry tomato (*Solanum lycoperiscum*) which had also been found during the 2012 survey. These host species were identified, counted and mapped. Each individual was examined for the presence of moths, their eggs and larvae and for signs of larval feeding.

RESULTS

Small populations of tree tobacco plants were found in both Sites 4 and 5. Although two cherry tomato plants were found during the 2012 survey, none were found during this survey. No other potential host plants in the tomato family (*Solanaceae*) were present either.

The summer and fall months in the project area were extremely hot, dry and windy. This resulted in significant mortality of even drought-hardy plants that grow in the area. Many of the grasses, trees and shrubs that had been alive in June, 2012 were found standing dead in February, 2013. Recent winter rains had stimulated a flush of new growth in surviving tree tobacco plants and a wave of new seedlings of a diversity of other plant species was emerging.

Tree tobacco plants were identified, counted and mapped (see Figures 2&5). Each living specimen was then examined for eggs, larvae and feeding damage. The results are shown below.

<u>Site 4</u>

Just one living tree tobacco plant was found in the east-central portion of this area (see Figures 3&4). Examination of this shrubby specimen yielded no moths, eggs, larvae or feeding damage. An additional two dead tree tobacco plants were found in the northeast corner of this site.

Site 5

This 16.7 acre area lies in a slight depression closer to the Kahului Airport Terminal. The area has been extensively used as a stockpile for gravel and large blue-rock boulders. Wherever the boulders are stockpiled, tree tobacco trees have grown resulting in two populations, one with about 55 plants and a second with 11 plants. These living plants range in height between 8 feet and 20 feet (see figures 5-11). Each plant was examined for Blackburn's sphinx moth eggs, larvae or signs of feeding. No activity of any kind was detected on any of the plants in these two populations.

No tree tobacco plants or any other potential host plants were found in any other locations within the project area.

CONCLUSIONS

The presence of Blackburn's sphinx moths and their activities on their preferred host plants are not difficult to detect during the wet winter months. Conditions were close to ideal for such detection in Sites 4 and 5 of the Kahului Airport Improvements, Consolidated Rental Car Facility Project at the time this survey was conducted. This survey did not reveal any Blackburn's sphinx moth activity in any of the areas on a total of approximately 67 potential host plants.

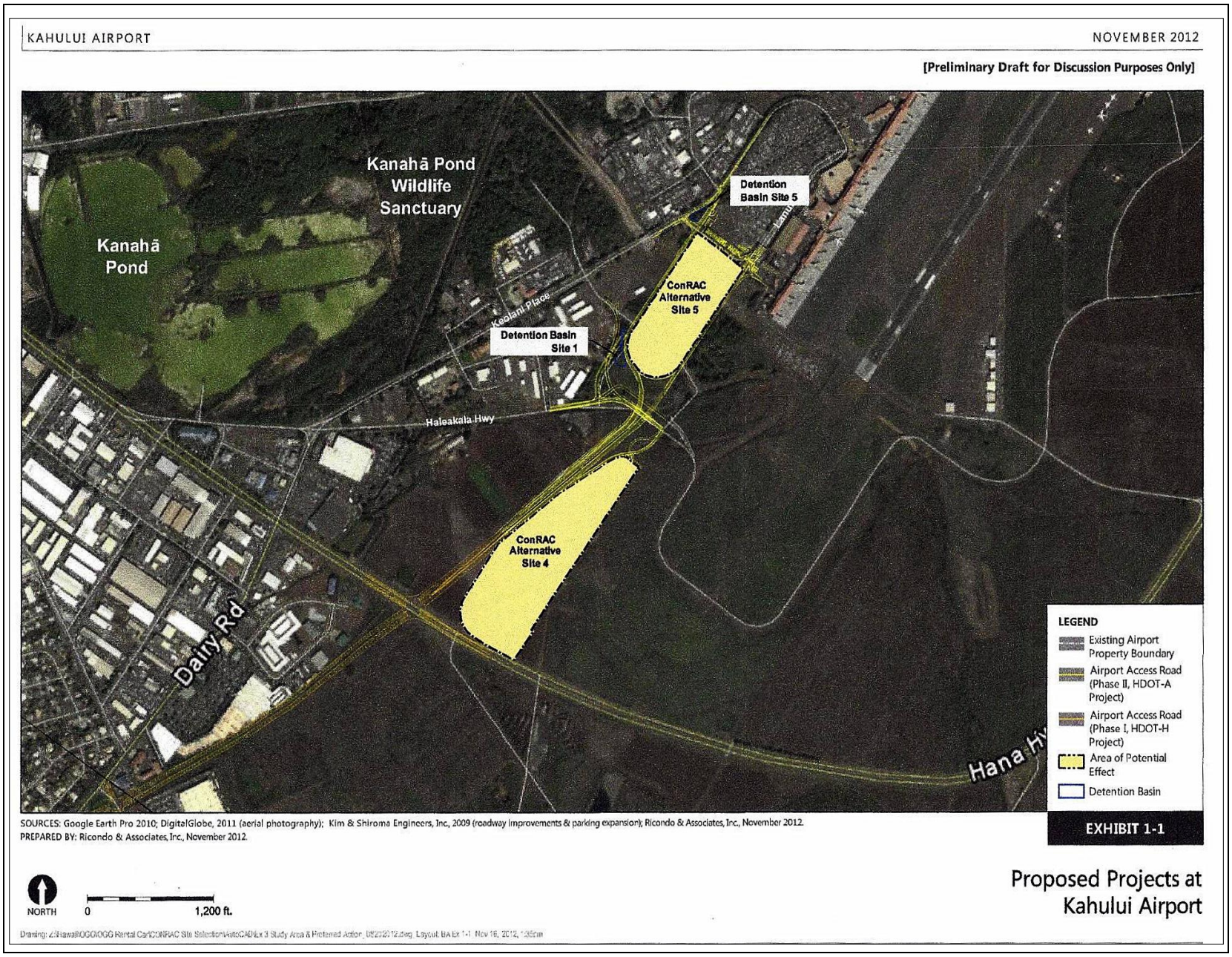


Figure 1 Project Map – Site Area 4 & 5

Figure 2 Site 4: with location of the single tree tobacco plant

Figure 3 – Site 4: The lone living tree tobacco plant in this site

Figure 4 – Site 4: A dead tree tobacco plant that did not survive the summer drought.

Figure 5 – Site 5: with the location of the approximately 66 tree tobacco plants

Figure 6 Site 5: Tree tobacco plants growing on stockpiled boulders

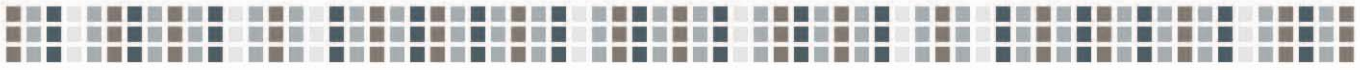
Figure 7 Site 5: The tobacco plants scattered among boulders

Figure 8 Site 5: Tree tobacco plants growing in a line of stockpiled boulders

Figure 9 Site 5: close-up of tree tobacco leaves and flowers.

Appendix C

Archaeological Inventory Survey



SCS Project Number 1291-5

AN ARCHAEOLOGICAL INVENTORY SURVEY OF APPROXIMATELY 41-ACRES FOR THE CONSOLIDATED RENTAL CAR FACILITY AND ASSOCIATED IMPROVEMENTS AT KAHULUI AIRPORT, KAHULUI, WAILUKU AHUPUA`A WAILUKU DISTRICT, ISLAND OF MAUI, HAWAI`I [TMK: (2) 3-8-001:123, 239 and 3-8-079:021]

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Revised November 2012

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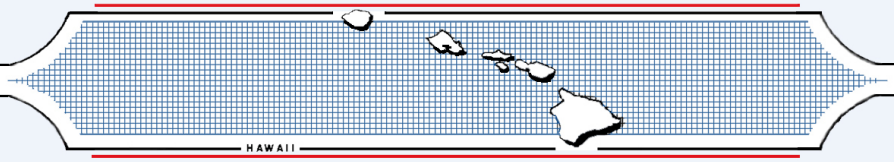

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ABSTRACT

Scientific Consultant Services, Inc. (SCS) conducted Archaeological Inventory Survey for Ricondo and Associates, Inc., representing the State of Hawaii Department of Transportation-Airports (DOT-A), on approximately 41-acres of mostly undeveloped land adjacent to the Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Island of Maui, Hawai`i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021]. Complete pedestrian survey of the three TMK parcels, inclusive of two areas for a proposed detention basin, and excavation of 36 representative trenches led to the identification of two historic properties: an historic-era concrete flume (State Site Number 50-50-04-7347) and a small generator building likely associated with former Navy use of the lands (State Site Number 50-50-04-7348). Both sites have been assessed as significant under Criterion D, but were not deemed significant or unique for listing on the National Register of Historic Places. Given the primary nature of past land use in the project area (sugar cane cultivation), as well as the absence of significant sedimentary series such as sand, no further work is recommended for the project area.

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INTRODUCTION

Scientific Consultant Services, Inc. (SCS) conducted Archaeological Inventory Survey (AIS) for the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021] (Figures 1 and 2). Fieldwork was conducted between June 8, 2012 and June 13, 2012, and again on October 29, 2012 by Ian Bassford B.A. and Michael F. Dega Ph.D. (project Principal Investigator). The study was conducted for Ricondo and Associates, Inc., representing the State of Hawaii Department of Transportation-Airports (DOT-A; landowner). The current study, as well as a Cultural Impact Assessment, will be included in the project Environmental Assessment (EA). The EA will satisfy FAA requirements (the lead Federal agency) and HRS 343 requirements.

Archaeological work in the project area was conducted to determine the presence/absence of archaeological deposits in surface and subsurface contexts. This was accomplished by thorough pedestrian survey and mechanical subsurface testing of representative locations within the project area. The ultimate goals of the project were to determine if significant cultural or historic resources, and/or human burials, occurred on the parcels and to provide significance assessments and recommendations to the State Historic Preservation Division (SHPD). Two historic properties were identified during survey, both on the surface. The current study precedes construction work for a proposed consolidated rental car facility and associated improvements at the airport. The land is owned by the State of Hawai`i.

ENVIRONMENTAL SETTING

PROJECT AREA DATA AND LOCATION

The parcels subject to Inventory Survey occur on c. 41-acres of undeveloped land adjacent to the Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Island of Maui, Hawai`i (see Figures 1 and 2). In general, Kahului is situated on the northern side of the low sandy isthmus between East and West Maui. The parcels studied during this project have variable acreage and different TMK designations (Figure 3): Parcel 4 composes 23 acres of cleared, former sugar cane land (Figures 4 and 5); Parcel 5 is composed of 15.7 acres of land that is currently used as a baseyard and construction materials storage area. Large piles of excavated soil from other locations, as well as asphalt, are mounded in some cases over 25 ft. in places (Figures 6 and 7). Within Parcel 5 is Parcel 5a, which contains c. 1 acre of land. Parcel 4 runs from near the southwestern flank of the runway area to Dairy Road while Parcel 5 and Parcel 5a occur west of the airport buildings, toward Haleakala Highway.

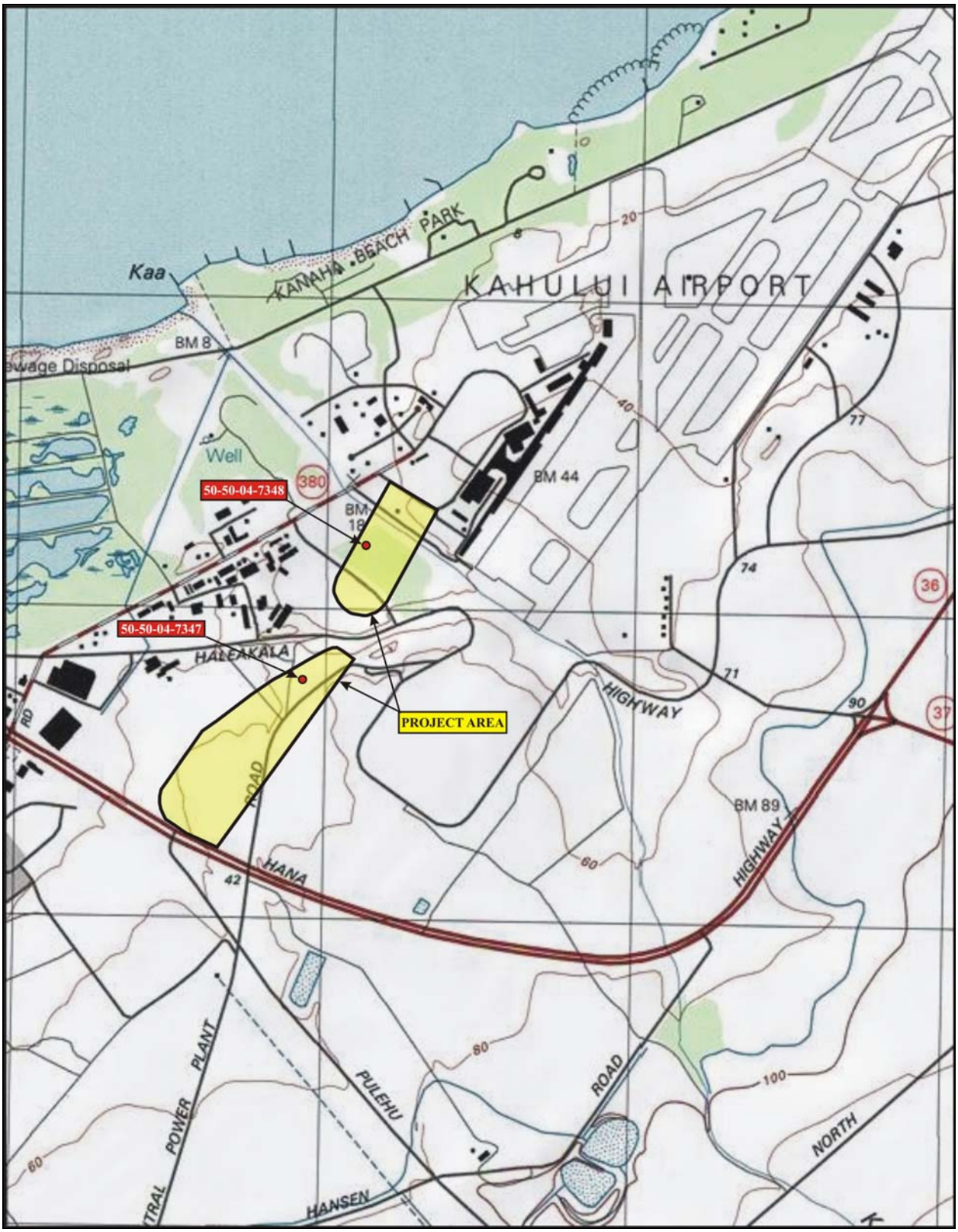

Figure 1: USGS Quad Map (Wailuku) Showing Project Area and Identified Sites.

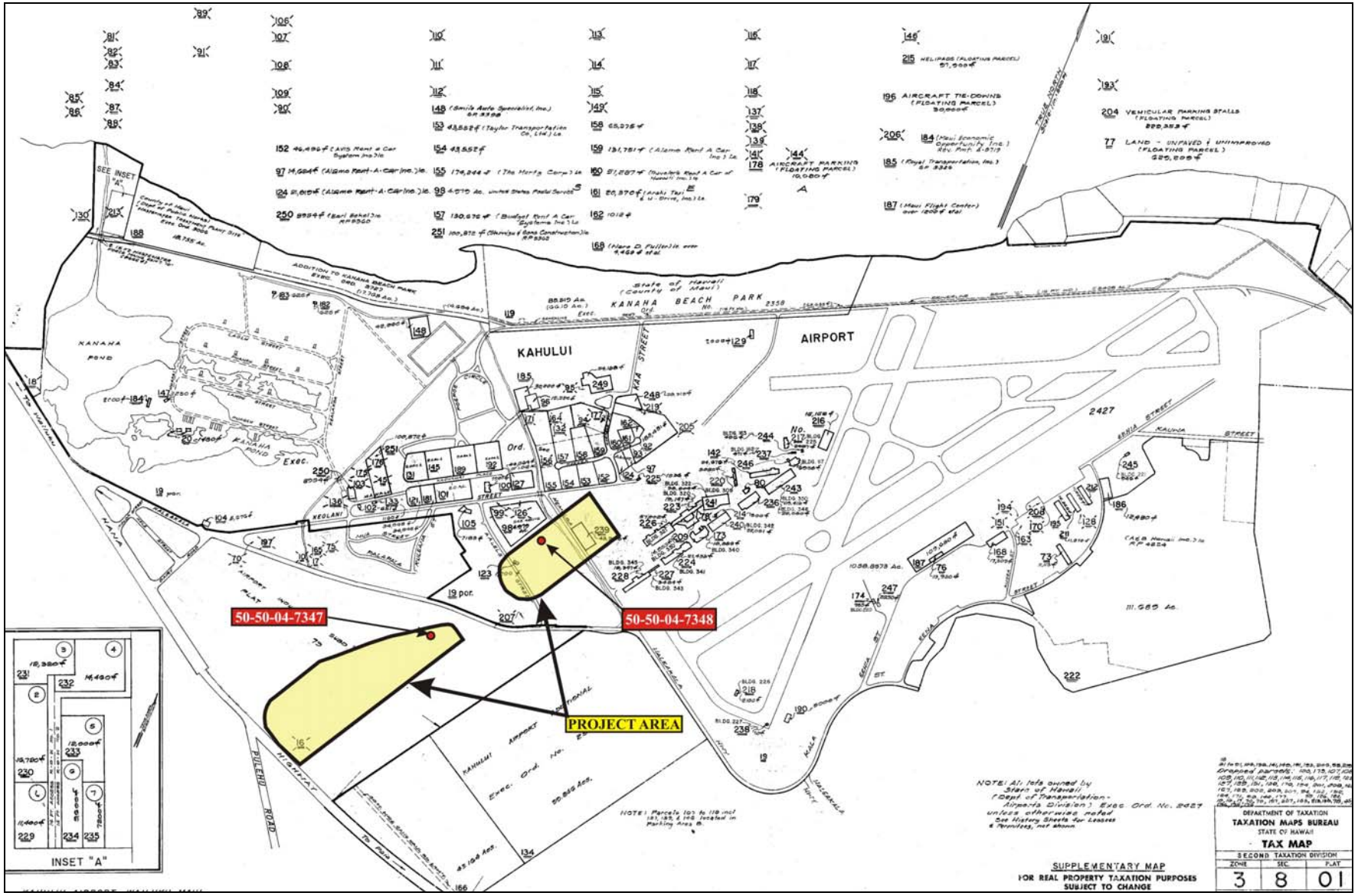

Figure 2: Tax Map Key of Project Area and Identified Sites.

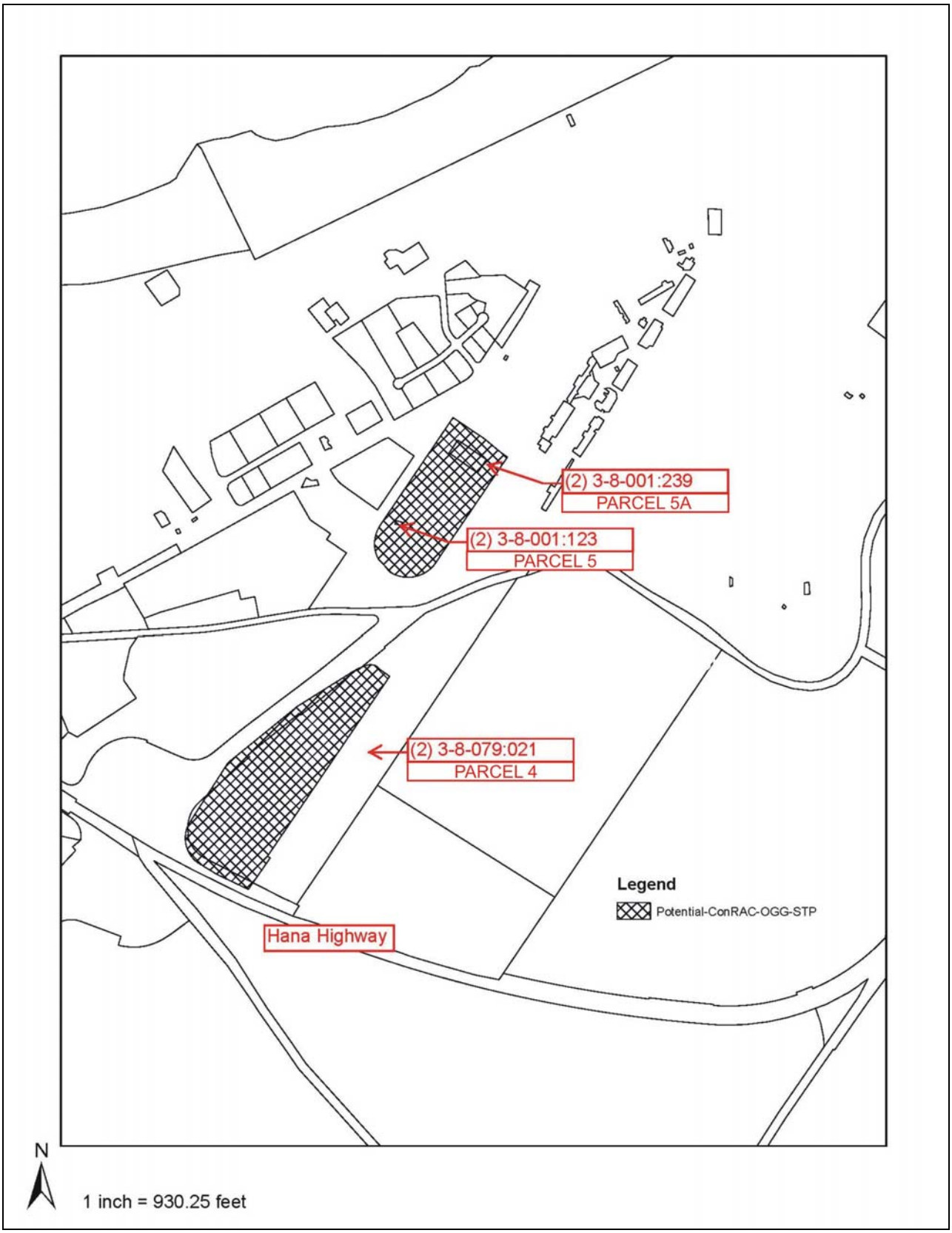

Figure 3: Map Depicting Parcels Composing Project Area and their TMK Designations.

Figure 4: Photographic Overview of Parcel 4. View to South. Note: Mill in Background.

Figure 5: Photographic Overview of Parcel 4 with Backhoe. View to Southwest.

Figure 6: Photographic Overview of Parcel 5, Central Section. View to Northwest.

Figure 7: Photographic Overview of Parcel 5, Central Section Looking Towards Airport. View to Southeast. Note: Large Mounds of Imported Soil and Fill.

In addition to these three main parcels, two other areas were surveyed for a proposed detention basin. Area 1, occurring just to the west of Parcel 5 (Figure 8), measures 0.96-acres and is very similar to Parcel 5 in that the entire area has been graded and piled with construction soils (fill), rocks, and removed asphalt. Dirt roads also run through Area 1. The second potential location for the detention basin was designated as Area 5, and occurs to the northwest of Parcel 5, with the airport road to terminal running by its western flank. Area 5 encompasses only 0.32-acres and is currently landscaped in common lawn grass, with several coconut trees. This small parcel also borders the western flank of the airport parking lot.

The terrain is relatively flat in most of the project area, some exceptions being around and within the border areas of Parcel 5 and in Area 1 which have been artificially filled, creating slopes and mounded areas. Parcel 4 is totally undeveloped, with portions of Parcel 5 and Parcel 5a containing currently operating businesses (Figure 9); Parcel 5a currently houses a UPS office. Area 5, one potential location for a detention basin, is a grassy area surrounded by airport access roads and the airport parking lot. The parcels all exhibit much evidence for previous intensive mechanical ground disturbance from grading, grubbing, blading, and filling events. Parcel 4 occurs at an elevation between 60 and 80 feet above mean sea level (amsl.) while Parcel 5 and Parcel 5a occur at an average elevation of 40 ft. amsl. There is one drainage in the project area, Kalialimui Stream. The stream runs north-south under a developed portion of Parcel 5. The stream is intermittent and previously would drain into the marshlands near the coast. More recently (1990), the stream became a channel and now drains into the ocean.

RAINFALL

The Kahului area is fairly dry owing in part to the 'rain shadow' effect of Haleakala. According to Armstrong (1983), annual rainfall in the project area is between the 500 mm (20 in.) and 760 mm (30 in.) isohyets. Giambelluca *et al.* (1986) indicate the project area sits more or less on the 500 mm (20 in.) isohyet.

SOILS

Project area soils are exclusively classified as "Molokai silty clay loam" (Foote *et al*. 1972:96; Sheet 104). These well-drained soils typically occur on 0-3% slopes and are derived *in situ* from weathered igneous rock. Soil permeability is classified as "moderate, runoff is slow, and the erosion hazard is slight" (Foote *et al.* 1972:96). The surface of the soil, to 57 inches below surface, consists of dark reddish brown silty clay loam. This was verified during trenching for the current project. Historically, this soil series was utilized entirely for sugar cane production. Dune Land (DL) is present outside, to the north, of the current project area.

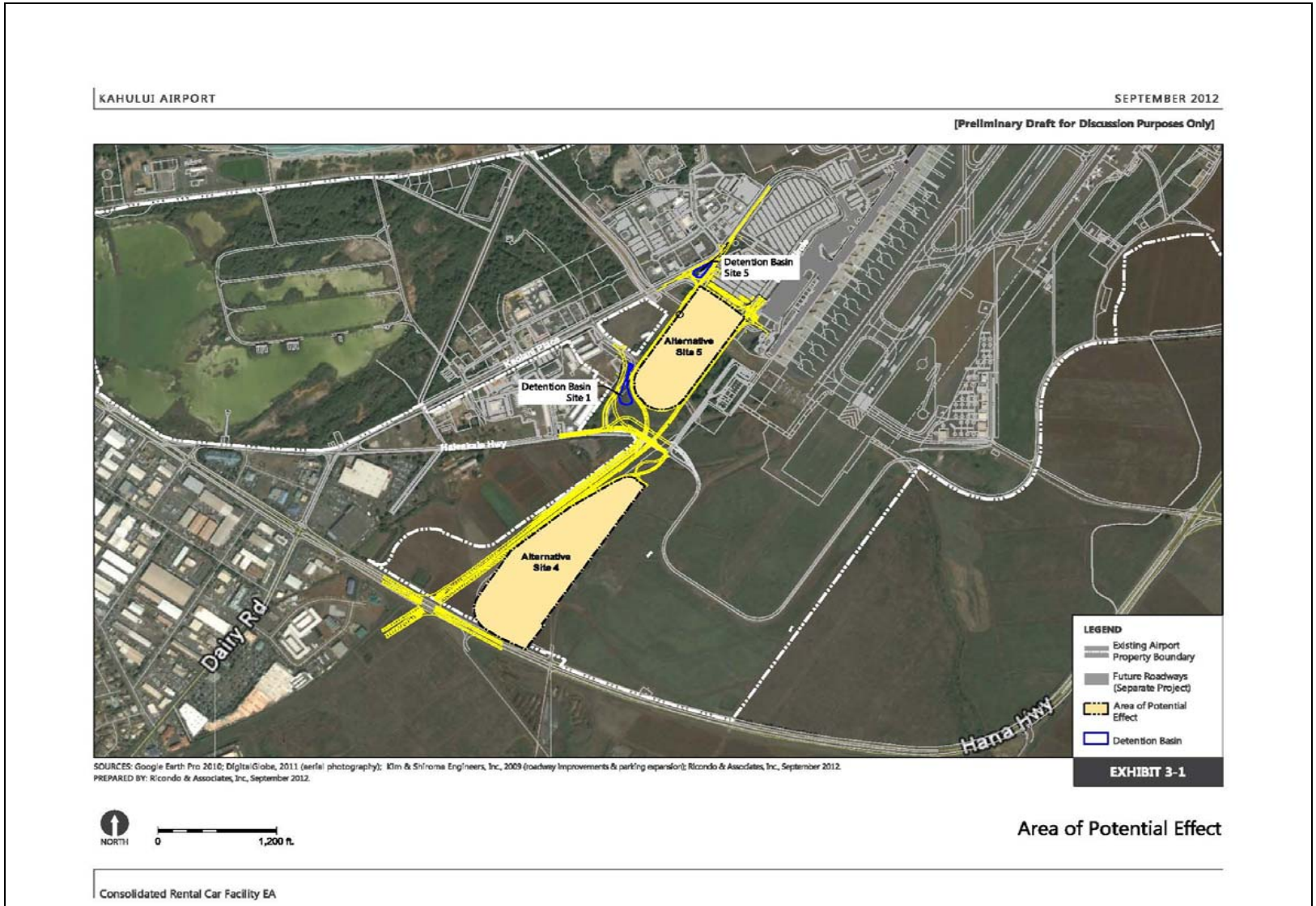

Figure 8: Aerial Photograph Showing Survey Location of Detention Basin #1 and #5

Figure 9: Photographic Overview of Parcel 5a, Built Environment. View to Northeast.

VEGETATION

Vegetation in the project area is very sparse and primarily consists of bufflegrass (*Cenchrus ciliaris* L.). Some *koa haole* (*Leucaenal leucocephala*), and the occasional *kiawe* tree (*Prosopis pallida*) are also present. Almost all of the parcels have been cleared of vegetation, including Parcel 4 having been cleared of fallow sugar cane in recent times.

HISTORIC BACKGROUND

TRADITIONAL SETTING

Kahului Town is part of Wailuku Ahupua`a and Wailuku District, which collectively have yielded substantial archaeological and historic records. The following is a brief summary of the salient aspects of these data.

In traditional times, Kahului was a relatively marginal settlement location, as compared with Wailuku Town and areas to the north of Wailuku. Handy (1940) described the low-lying coastal areas east of Wailuku (including Kahului) as having scattered fishing settlements, which implies a relatively low population density or limited socio-economic status.

The Wailuku District was once known as "The Four Streams Area" (*Na Wai Eha*), which refers to the four main valleys that drain the eastern slopes of West Maui, including the massive `Īao Valley (Handy and Handy 1972). The area from Waihe`e to Wailuku was formally the most extensive continuous area of wet taro cultivation in the Hawaiian Islands. Wailuku, itself, has been described as a "chiefly center" (Sterling 1998:90), although the seat of power was almost certainly concentrated in and around the `Īao Valley, on the other (west) side of Wailuku from the project area. Areas upslope and west of the project area, including Wailuku Town, were once covered with *lo`i* (irrigated stone terraces) and house sites. Areas downslope and closer to the project area were burial grounds in traditional times.

Areas around the Waihe`e and Waiehu Streams, although a few miles north of the project area, have yielded some of the earliest settlement dates in Maui (Kirch 1985). Cordy *et al.* (1978) have proposed that the coast and lower valleys in this area were first settled by A.D. 300 to 600. Closer to the project area, the Wailuku Sand Hills, about a mile to the west, have yielded substantial numbers of burials and other evidence of traditional Native Hawaiian settlement (see PREVIOUS ARCHAEOLOGY section below).

Sterling's (1998) compendium of traditional archaeological sites on Maui has much to say about the Wailuku District, in general, and the Wailuku Ahupua`a, in particular. Documented *heiau* from Wailuku Ahupua`a include:

- Kaluli Heiau (Walker Site 42)—since destroyed
- Pihana Heiau (Walker Site 43)—located just west of the Sand Hills (Wailuku)
- Halekii Heiau (Walker Site 44)—located just north of the Sand Hills (Wailuku)
- Various Heiau (Walker Sites 45–54)—ten named *heiau* in Wailuku, all destroyed

A major inland fishpond was located at the present day spot of Kanaha Pond and Bird Sanctuary, just west of the project area. In traditional times, this was sometimes referred to as two, artificially joined ponds (Kanaha and Mauoni).

There is an interesting passage about Kahului during the mid-nineteenth century by G.W. Bates (1854), cited in Sterling (1998). Bates' interpretation of a major battleground site in Kahului may not have been accurate, although there are many oral traditions about battles in this general area, but the rest of his description is instructive and worth quoting at length:

> Leaving Wai-lu-ku, and passing along toward the village Kahului, a distance of three miles, the traveler passes over the old battle-ground named after the village. It is distinctly marked by moving sand hills, which owe their formation to the northeast trades. Here these winds blow almost with the violence of a sirocco, and clouds of sand are carried across the northern side of the isthmus to a height of several hundred feet… In places laid bare by the action of winds, there were human skeletons projecting…[out of the dunes] (Sterling 1998:92)

HISTORIC TIMES

Literally hundreds of Land Commission Awards (LCA) are documented for Wailuku Ahupua`a (see, *e.g.,* Sterling 1998:86; Burgett and Spear 2003), although, in keeping with the broad settlement pattern outlined above, most of these were located in and around `Īao Valley, west of the Wailuku Town and well removed from the project area. The existence of such large numbers of LCAs, however, attests to the large settlements in the lower `Īao Valley during the mid-nineteenth century; residents of Kahului were no doubt drawn into this sphere of influence. There are no LCAs for the project area, however, which, according to TMK data, is owned by the State of Hawai`i.

Traditional land utilization was rapidly and dramatically supplanted by sugar cane cultivation during the 1850s (Dorrance and Morgan 2000). Documentation of 19th century land

use in the area is much more pronounced, which also may mean that limited traditional period activities occurred in and near the current project area. Many of the awarded LCAs in Wailuku Ahupua`a were under sugar cane cultivation by the mid-nineteenth century. Sites and features built during this period include water irrigation ditches, terraces, free standing walls, historic houses, and mill structures. Cultivation of sugar cane dominated land use in Wailuku Ahupua`a from the 1880s through the 1990s (see Tuggle and Welch:24).

Pertinent to the current project area, particularly Parcel 4, lands inclusive of this parcel were considered Crown Lands (c. 1848). To summarize from Fredericksen and Fredericksen (1988:8-11), in 1882, the fee title to many lots/parcels in the Wailuku area were acquired by Claus Spreckles under Grant 3343 (from 'King Kalakaua'). The property consisted of 24,000 acres of land from Wailuku to Paia and toward Ma`alaea, a portion of which included the current Parcel 4 near the highway. In 1885, the property was sold by the Spreckles to the Hawaiian Commercial and Sugar Company, a California company owned by the Spreckles, for five dollars. The company was located in San Francisco, California, with the plantation headquarters being in Spreckelsville, Maui. In 1898, Hawaiian Commercial and Sugar Company was purchased by James Castle, William Castle, Henry Baldwin, and Samuel Alexander, the latter two founding the Alexander and Baldwin company. The Hawaiian Commercial and Sugar Company constructed the Puunene Mill in 1902 to increase production and the Koolau Ditch in 1904 to transport more water to the mill. By 1928, the annual crop production had reached 70,000 tons of sugar. Parcel 4 of the current study was part of this production zone. Also in the 1920s, a railroad was constructed to haul the cane; the railroad was present just to the north of current Parcel 5 (see Tuggle and Welch 1995:19). Interestingly, a portion of the Parcel 5 area was cut and filled between 1924 and 1964, during the various phases of construction in the area, including many of the NASKA facilities, which mostly were built to the north of the current project area. These facilities included buildings/offices, support facilities, magazines, and other infrastructure.

According to Tuggle and Welch (1995), during World War II (1942), the current airport area was leased by the U.S. Military and developed into Naval Air Station, Kahului (NASKA), with at least one-third of these lands still being in sugar cane. Areas inland of Runway 2/20 were sugar cane lands from the 1880s through construction of the airport and camps occurred in the area, near the fields, to the 1950s when they were torn down. After the war, in the early 1950s, air facilities were acquired by the Territorial government and utilized for commercial and general aviation purposes. In 1954 a third runway was constructed. This airport has since developed into the major transport hub seen today.

PREVIOUS ARCHAEOLOGY

Multiple archaeological investigations have been conducted over the past few years near the present project area in Kahului, Maui. Inventory Survey and Monitoring programs have yielded variable results. The subsequent text provides a brief overview of previous archaeological work conducted in the very general vicinity of the Kahului Airport area, followed by a listing of the known sites occurring within or very near the airport itself.

Generally to date, Fredericksen and Fredericksen (1988) conducted the most intensive study of the area through Inventory Survey. The survey led to the identification (but not full recordation) of several supposed volcanic glass concentrations, historic irrigation ditches, and old stream gravels. The volcanic glass debris was later re-interpreted as slag associated with mill production. No subsurface deposits were identified near Dairy Road in former sugarcane lands, within currently studied Parcel 4.

Folk and Hammatt (1991) conducted Archaeological Inventory Survey adjacent to Kalialinui Drainage Canal (which was under construction in 1990 during the fieldwork), between the airport and Hana Highway, to the north of the present project area. The survey resulted in the documentation of a buried A-horizon and two basalt boulder alignments. The A-horizon, a former living surface, was encountered in sandy deposits near the coastline, an environment quite different from the current project area.

SCS has monitored construction activities in and around the airport property itself (Shefcheck and Dega 2006a, 2006b). The proposed access road work was divided into two phases. Phase I referred to the western half of the new road, from the corner of Dairy Road and Puunene Avenue, to the nexus of the proposed road and Hana Highway. This first phase included improvements to Dairy Road itself, as well as the construction of a new road originating just east of the First Assembly of God Subdivision and stretching eastward to Hana Highway. Phase II was continued east from Hana Highway to the north side of Kahului Airport. The second phase also include improvements Hana Highway itself.

Phase I consisted of roadway and drainage improvements in areas that have been previously disturbed and impacted by the existing airport infrastructure. Phase II included all additional work necessary to complete the project and includes improvements/construction in areas not previously impacted by existing airport infrastructure. The Runway Safety area improvements (RSA) encompassed an area 250 to 300 feet on either side of the runway, the

centerline of which defines the limits of the RSA work. Monitoring these areas did not lead to the identification of significant historic properties.OTHER Near Project Area Sites

Multiple archaeological features have been identified within the airport parcel itself. T hese sites and one letter report pertaining to a recent reconnaissance of the airport area are discussed individually below to provide a more immediate background to current project area archaeology. This information is paraphrased from a Xamanek Researches, LLC Letter to SHPD and dated January 20, 2006 (Xamanek Researches, LLC. 2006).

Site 50-50-05-1777: This site consists of a traditional-period cultural deposit occurring in subsurface contexts. Subsurface features, midden, and artifacts were documented at the site, all interpreted as related to prehistoric habitation. The site was dated to A.D. 1380-1700, firmly within pre-Contact times.

Site 50-50-05-1798: This site is composed of multiple burials and is located outside the RSA to the northeast of "Runway 5-23." Significant features at the site include a re-burial area (from c. 20 years ago), a subterranean terrace wall, and associated pond field deposits (gleys, alluvium).

Site 50-50-05-1799: This site consists of a 4 m long rock alignment and a possible coral pavement. The site was identified to the north of Site -1798.

Site 50-50-05-2849: This site consists of an extensive subterranean cultural deposit located at the east end of the airport property at Papa`ula Point. Papa`ula Point is translated by Mary Kawena Pukui as "red flats" (Pukui *et al* 1974:180).

Site 50-50-05-4197: This historic-period site is composed of features related to the former World War II Naval Air Station (NASKA).

Site 50-50-05-1783: This site consists of Kanaha Pond itself. Kanahā Pond is said to have been built by the legendary Ali`i Kihaapi`ilani, brother in law of `Umi who lived about A.D. 1500 (Pukui *et al* 1974:83). *Āe`o* (Hawaiian stilt) populate the pond and 50 or more other bird species have been observed in this area, indicating the rich resources the pond offers, in modern and traditional times. Kanahā Pond is currently designated as wildlife refuge.

Letter Report (Xamanek Researches, LLC. dated January 20, 2006): Xamanek conducted a Field Inspection within a portion of the Kahului Airport at TMK:3-8-01:19. Several previously unknown sites were identified during the Field Inspection. These consisted of a re-deposited surface scatter, a linear wall, and a possible platform. Further work related to these sites occurred during the current project's Inventory Survey phase of work.

As noted in the Kahului area and throughout Hawai`i, and as summarized by McGerty and Spear (2001), there is an acute positive relationship between the presence of sandy substrate and traditional native Hawaiian burials (see Kirch 1985). Archaeological studies conducted

around the perimeter of Kahului Bay and slightly inland (inclusive of the current project area) have led to the identification of deposits related to remnants of the old Kahului Railroad bed, historic refuse, pre-Contact artifacts, midden, and isolated findspots of human remains. The depth of these cultural resources varies depending on previous construction activities in an area but often, these deposits have been identified from 0.2–2.0 meters below the ground surface. Many of these resources are associated with sandy substrata, which is similar to that in the project area.

In 2006, SCS (Morawski and Dega 2006) conducted Archaeological Inventory Survey of multiple areas around the airport runways. The surveys yielded negative findings as no historic properties were identified either on the ground surface or in subsurface deposits.

SETTLEMENT PATTERNS AND EXPECTED FINDINGS

Based on all of the above background information, including the previous survey work conducted directly within Parcel 4 of the current project, expected findings of this Archaeological Inventory Survey were as follows:

(1) There was a very low probability of identifying traditional Native Hawaiian burials as the current project area is removed from dune lands (sand) and Jaucus sand, these typically associated with burials.

(2) There was a low likelihood of finding subsurface evidence of traditional Native Hawaiian activities, including hearths (*imu*), midden deposits, and other occupation debris (*e.g.,* stone tool waste, temporary activity camps) as a) the coastal area was so close, an area representing permanent habitation and activity areas; b) soils and physiography were not conducive to large events which would leave archaeological signatures; and 3) the current parcels were subject to massive land alterations through time *(i.e.*, sugar cane cultivation).

(3) There was a moderate likelihood of finding historic debris of various kinds, especially as fill or past garbage dumping; sites and features, such as ditches related to commercial sugar agriculture and former military presence (NASKA; buildings) were also possible;

(4) Overall, there appeared prior to fieldwork, to be a low probability of finding significant surface features or sites, since the project area had been severely impacted through intensive sugar cane cultivation, airport construction, or simply its location in an area removed from the coast offering few natural resources.

METHODOLOGY

Inventory Survey involved archival work prior to fieldwork, survey and testing in the field, and laboratory work. Archival research entailed investigating the historic and

archaeological background of the general project area. This examination included a documentary search of previous archaeological research conducted in this region of Maui, as well as a review of archival literature relating to Land Commission Awards and local mythology. The review of historical documents was mainly accomplished in order to understand the impact of post-Contact events on the cultural and archaeological landscape of the region and to assess what types of sites could be present in the project area.

Fieldwork was conducted between June 8, 2012 and June 13, 2012, and again on October 29, 2012 by Ian Bassford B.A. and Michael F. Dega Ph.D. (project Principal Investigator). A total of 88 person hours were expended during the project (not including the backhoe driver). Two main fieldwork activities were conducted:

(1) *100 percent pedestrian survey of the project area.* All three parcels composing the main project area, as well as Area 1 and Area 5, proposed detention basin locations, were walked, measured, and compared with existing maps in order to accurately establish parcel boundaries. The project area was inspected for evidence of surface features (*i.e*., architecture, midden and artifact scatters). A 100% pedestrian survey utilizing 20 meter (m) transects was utilized by the crew and oriented roughly north-south. The 20 m survey distance was adequate as surface visibility was high; all parcels were primarily clear of vegetation. Notes were also acquired on vegetation regimes, soils, topographical variations (*e.g.,* depressions and built-up areas), and other landscape characteristics which could indicate past human alterations of the landscape. Survey also involved selecting representative locations for testing. During survey, two sites were identified, both of which were mapped, recorded, and located by GPS on project area maps.

(2) *Mechanically test (excavate) for subsurface evidence of significant archaeological and/or historical sites or features.* A total of thirty-six (36) Stratigraphic Trenches (ST) of varying length were excavated using a 315C Cat backhoe with 36" bucket (Table 1). All excavation was directed and monitored by SCS archaeologists. The trenches were positioned in order to sample representative portions of the project area. Trenches were placed on Parcel 4 and Parcel 5. No trenching was done on Parcel 5a as it is a built environment actively used by multiple businesses (*i.e*., UPS airport office). No trenching was done in Area 1 nor Area 5 for the detention basin as Area 1 was identical to adjacent Parcel 5, and Area 5 marks the entry point to the airport and covered in grass and maintained as part of the airport landscaping.

Soils from trench excavations were not screened. All trenches were photographed upon completion. One representative excavation wall in each trench was sketched to illustrate soil stratigraphy. Soil and sediments were described in accordance with standard archaeological procedure (U.S. Dept. of Agriculture Soil Survey Staff 1951, 1962; Munsell 1990).

Laboratory work, which was conducted at SCS facilities in Honolulu, consisted of digitally drafting all maps and stratigraphic profiles, cataloguing all project area photographs, and reporting. All documentation pertaining to this project is currently being curated at SCS facilities in Honolulu.

RESULTS

OVERVIEW

Two historic properties were identified during survey of the project area: an historic-era concrete flume (State Site Number 50-50-04-7347) and a generator building likely associated with former Navy use of the lands (State Site Number 50-50-04-7348). Site -7347 was documented in Parcel 4, former cane lands, while Site -7348 was identified in Parcel 5, just to the north of the airport (see Figures 1 and 2). No cultural deposits were identified within any of the 36 trenches tested across the project area.

SIHP No.: 50-50-04-7347 (TS-1) **Condition**: Fair
GPS Coordinates: E 0765904 N 2311756
Site Type: Flume
Function: Water Transport
Feature (#): 1
Age: Historic
Recommendation: No Further Work
Description: Site -7347 is a concrete flume running northeast-southwest (50º/230º) on Parcel 4, former sugar cane lands (Figures 10 and 11). The flume remnant measures 30 m long by 0.50 m wide, and 0.50 m deep. The flume was composed solely of concrete, with thin sidewalls and slighter thicker base. The feature was utilized to transport water to the fields and was constructed from the early to mid 1900s.

SIHP No.: 50-50-04-7348 (TS-2) **Condition**: Fair
GPS Coordinates: E 0766133 N 2312198
Site Type: Building
Function: Generator

Feature (#): 1
Age: Historic
Recommendation: No Further Work
Description: Site -7348 is a small building located in the northern, central portion of Parcel 5 (see Figures 1 and 2; Figure 12). Site -7348 was the only standing structure in the project area and had been recently used as a temporary shelter. The building measures 10 m long by 6.3 m wide and approximately 4 m high. The building has one entry point, on the southwestern flank.

Soil has been both bulldozed and eroded through the opening and around the exterior flanks of the building. An inspection of the interior only revealed recent temporary shelter use, the remainder of the structure having been completely cleared. Given the lack of ventilation, one could suspect this structure to be a military generator room. This assessment was supported by Nancy Farrell of CRMS, Inc., Army Historian (Pers. Comm.). The structure was presumably associated with World War II activities when this area was constructed as the Naval Air Station, Kahului. Thus, Site -7348 is interpreted as a small generator building having been constructed in the 1940s.

REPRESENTATIVE TESTING

A total of 36 Stratigraphic Trenches (ST) were mechanically excavated within the project area (Figure 13). Twenty-four (24) trenches were placed throughout Parcel 4 and twelve (12) trenches were placed within Parcel 5 (Table 1). No trenches were placed on Parcel 5a, Area 1, or in Area 5, as noted above. Trenching may have disrupted on-going business in the area, was redundant (Area 1=Parcel 5), or would have significantly altered the landscaping heading into the airport (Area 5). The findings are summarized as follows:

(1) No cultural materials or deposits/features of potential historic significance were present in subsurface contexts in project area;

(2) All excavated trenches exposed natural, silt deposits overlying the area C-horizon. On Parcel 5, the silts underlay engineered fill deposits from the surface. Silt, an agricultural use layer, was ubiquitous in each excavated trench, with differences between trenches only in varying levels of compactness. No sandy sediment was identified in any of the trenches.

(3) No traditional artifacts or buried cultural layers were identified in any of the excavation trenches;

(4) No human remains were identified in any of the excavation trenches.

Figure 10: Photograph of Site -7347 Flume. View to North.

Figure 11: Photograph of Site -7347 Flume. View to West. Note Concrete Sidewalls.

Figure 12: Photograph of Site -7348 Generator Building. View to Southeast. Note: Mounded Area behind Structure is Massive Bulldozer-Created Earthen Berm (Modern).

Table 1: Summary of Stratigraphic Trenches (ST) excavated in the Project Area

Unit	Parcel No.	Size (m) Length x Width	Depth below surface (m)	Layers Present	GPS Coordinates East/North	Primary Unit Texture
ST-1	4	5.3 x 1.2	1.42	2	0766037/2311807	Silt
ST-2	4	4.7 x 1.0	1.82	2	0765959/2311808	Silt
ST-3	4	5.0 x 1.2	1.53	2	0765987/2311729	Silt
ST-4	4	5.7 x 1.0	1.45	2	0765954/2311729	Silt
ST-5	4	6.2 x 1.1	1.96	3	0765893/2311639	Silt
ST-6	4	5.3 x 1.0	1.85	3	0765866/2311576	Silt
ST-7	4	4.8 x 1.3	2.30	3	0765916/2311625	Silt
ST-8	4	4.2 x 1.0	1.40	3	0765827/2311625	Silt
ST-9	4	4.8 x 1.1	1.65	3	0765766/2311606	Silt
ST-10	4	5.2 x 1.0	1.62	3	0765709/2311575	Silt
ST-11	4	5.8 x 1.1	1.65	3	0765653/2311547	Silt
ST-12	4	5.1 x 1.1	1.72	2	0765748/2311493	Silt
ST-13	4	4.8 x 1.0	1.60	2	0765599/2311510	Silt
ST-14	4	5.2 x 1.0	1.30	2	0765556/2311471	Silt
ST-15	4	5.6 x 1.1	1.60	2	0765515/2311384	Silt
ST-16	4	5.2 x 1.0	1.40	2	0765567/2311319	Silt
ST-17	4	5.7 x 1.1	1.60	2	0765610/2311379	Silt
ST-18	4	5.1 x 1.0	2.00	2	0765638/2311426	Silt
ST-19	4	4.8 x 1.1	1.70	2	0765690/2311466	Silt
ST-20	4	5.9 x 1.2	1.45	2	0765695/2311400	Silt
ST-21	4	5.7 x 1.0	1.50	2	0765649/2311326	Silt
ST-22	4	6.0 x 1.1	2.00	2	0765634/2311281	Silt
ST-23	4	6.2 x 1.0	1.20	2	0765703/2311312	Silt
ST-24	4	6.1 x 1.0	1.80	3	0765749/2311403	Silt
ST-1	5	5.3 x 1.0	0.85	1	0766239/2312132	Fill, Silt
ST-2	5	5.6 x 1.0	2.35	2	0766229/2312123	Fill, Silt
ST-3	5	4.3 x 1.0	2.50	2	0766216/2312094	Fill, Silt
ST-4	5	4.9 x 1.2	2.30	2	0766198/2312063	Fill, Silt
ST-5	5	4.8 x 1.3	1.10	2	0766183/2312018	Fill, Silt
ST-6	5	5.2 x 1.2	4.25	1	0766155/2312014	Silt
ST-7	5	9.6 x 1.0	3.60	1	0766215/2312148	Silt
ST-8	5	20.4 x 1.0	3.21	1	0766186/2312166	Silt
ST-9	5	13.0 x 1.1	3.20	1	0766118/2312103	Silt
ST-10	5	5.0 x 1.0	2.74	2	0766122/2312278	Fill, Silt
ST-11	5	5.3 x 1.0	2.35	1	0766100/2312064	Silt
ST-12	5	5.5 x 1.2	2.21	1	0766142/2312153	Silt

In total, some 8,410 m² of sediment was excavated in linear fashion from 36 trenches (length by width; 27,583 sq. ft.). Another 70.18 m of sediment may be added representing the total depth achieved from the 36 units. Trenches averaged 6.03 m long, 1.07 m wide, and were excavated to 1.94 m below the surface (20 feet long, 3.5 feet wide, 6.5 feet deep).

SOIL STRATIGRAPHY

A majority of the trenches excavated during this project occurred on Parcel 4 (N=24) and exhibited little diversity. All trenches were culturally sterile. Silt was the most common texture of sediment in these former sugar cane cultivation lands. Profiles varied from two to three layers, all composed of silt (Appendices A and B). Minimal differences were observed in compactness of the layers and minor coloration changes (mottling) in the silt, which could have simply been a function of varying light factors. Almost each excavation unit terminated at a saprolitic rock base, overlying bedrock. A common profile for Parcel 4 is presented below (Figures 14 and 15):

> Layer I (0-0.70 mbs) Dark Brown (7.5YR 3/4) compact silt with few clastics and roots. Plow zone horizon with diffuse, smooth boundary (In Figure 14, note demarcation of plow zone, reddish hue area).
>
> Layer II (0.70-1.20 mbs) Dark reddish brown (5YR 3/4) compact silt with no clastics and few rootlets and roots. Diffuse lower boundary.
>
> Layer III (1.20-1.80 mbs) Dark reddish gray (5YR 4/2) compact silt with no clastics and few roots. Boundary at 1.80 with saprolitic rock, base of excavation (C-horizon).

Stratigraphic Profiles on Parcel 5 were also similar: both parcel sediments were dominated by silts, with the only differences being slight coloration changes and compactness (see Appendix A). Parcel 5 also had several trenches containing engineered fill, particularly in the western and central portions of the parcel that had been completely graded (Figures 16, 17, and 18). A common profile for Parcel 5 is illustrated below:

> Layer I (0-0.90 mbs) Red (2.5YR 5/8) engineered fill, very compact. This stratum contained silty clay sediment with small, coarse pebbles, this matrix having been mechanically compacted.
>
> Layer II (0.90-2.70 mbs) Dark brown (7.5YR 3/4) silt, very compact with no clastics and few roots.

Overall, the sedimentary sequence documented in the project area was fairly homogeneous: silt and some silty loam, and engineered fill were the only soil series documented. This is slightly juxtaposed to the Foote *et al*. (1972) assessment of the general area which lists the entire soil series as silty clay loam. There was a definite absence of clay and sand texture in the profiles, silt being dominant. Upper levels of the strata were common plow zone levels that reached up to 0.60+ mbs. On Parcel 5, the upper layers of sediment represented imported fill during development of the Naval Air Station, Kahului in the 1940s.

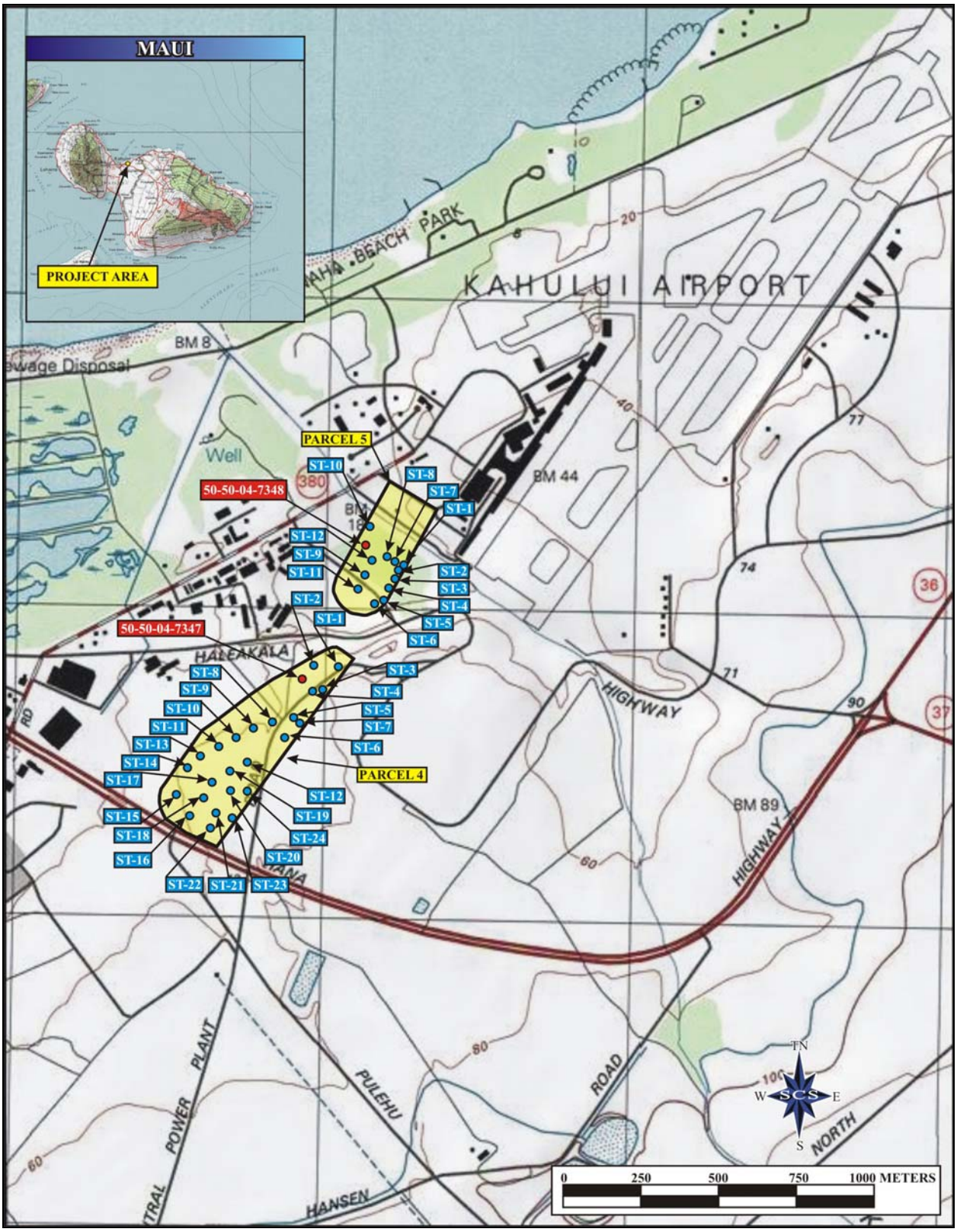

Figure 13: USGS Map Depicting Trenching Locations on Parcel 4 and Parcel 5.

Figure 14: Photograph of Stratigraphic Profile from Parcel 4 Trench, South Wall. Note: Upper Plow Zone Layer Visible by Hue Differences Between Lower Levels of Trench.

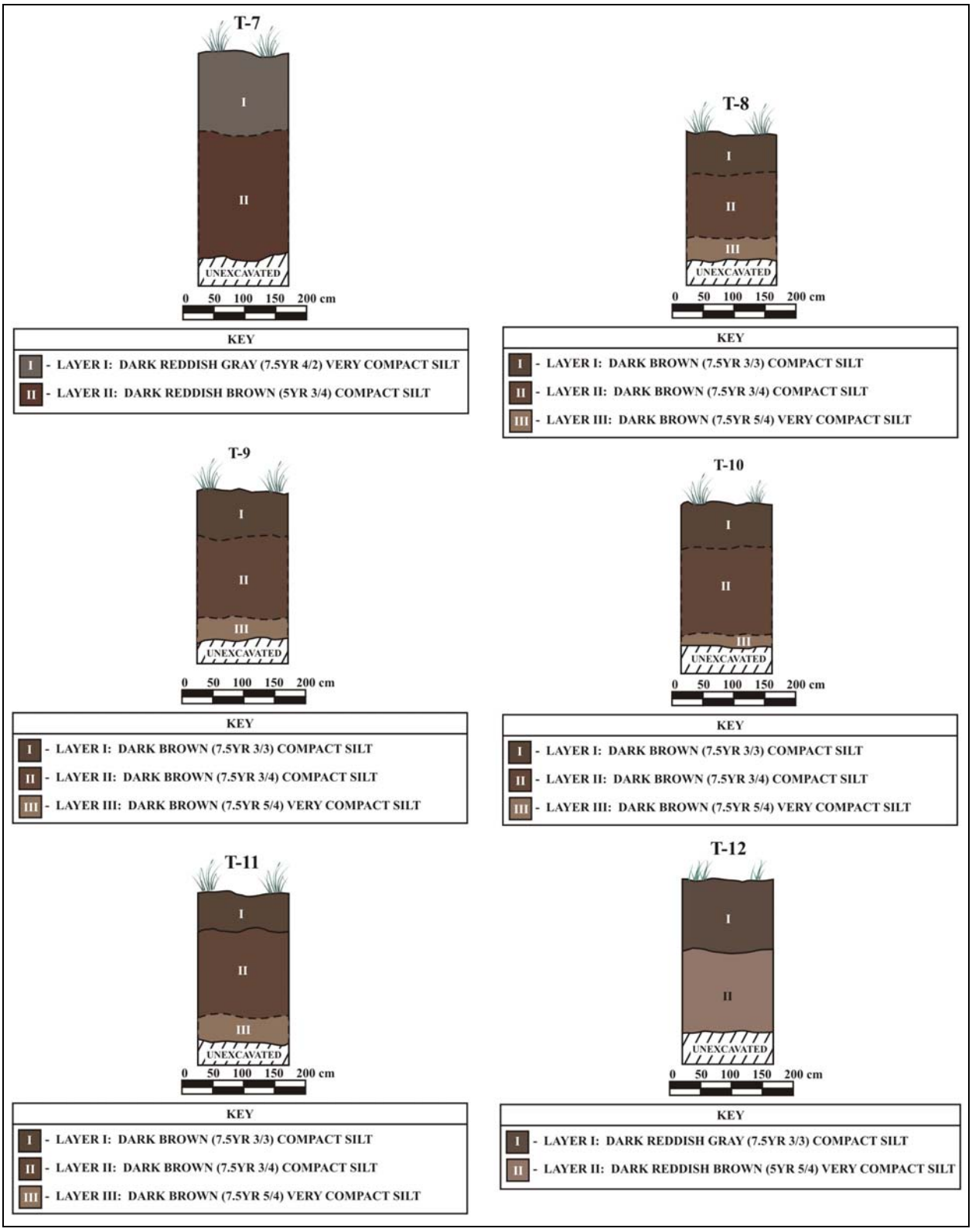

Figure 15: Representative Stratigraphic Profiles from Parcel 4.

The only sand encountered in the large-scale excavations was in Trench 5 on Parcel 5. The sand was only a few inches thick and covered an existing utility trench. Testing was abandoned upon reaching the sand and utilities. Otherwise, Dune Land and Jaucus sand series occurred to the north of the current project area, some "1,000 feet inland" from the coastline (see Folk and Hammatt 1991:1). In most instances, excavation of the trenches ceased when saprolitic rock, represented by deteriorated basalt bedrock in the silt matrices, was reached. The base of excavation was essentially the C-horizon, and in which no cultural materials occur below that level.

DISCUSSION AND CONCLUSIONS

Archaeological Inventory Survey was conducted on c. 41-acres of mostly undeveloped land adjacent to the Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Island of Maui, Hawai`i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021]. Complete pedestrian survey of the three TMK parcels, including two locations for a proposed detention basis, and the excavation of 36 representative trenches led to the identification of two historic properties identified on the surface of Parcel 4 and Parcel 5. Parcel 5a is actively being used as a UPS airport office. Site -7347 consists of a short remnant, concrete flume. The flume was present on Parcel 4, directly within former sugar cane cultivation lands, and functioned to transport water to the fields. The site dates to the early to mid 1900s. Site -7348 is a small building in the north-central portion of Parcel 5. The building likely housed a generator and was constructed in the 1940s, when the current airport area was transformed into Naval Air Station, Kahului.

A large sample of backhoe trenches were utilized to test for the presence/absence of subsurface cultural strata and materials. Of the thirty-six trenches, none yielded significant cultural features, deposits, or artifacts. The sedimentary series of the area, silt, was fairly homogenous through the project area. No natural sands were encountered in any trench.

SITE SIGNIFICANCE AND RECOMMENDATIONS

Both Site -7347 and Site -7348 have been assessed as significant under Criterion D, but were not deemed significant or unique for listing on the National Register of Historic Places. Both features, only in fair condition, have been documented and photographed. No further work is recommended for either site. In addition, given the intensive, primary nature of past land use in the project area (sugar cane cultivation), as well as the absence of significant sedimentary series such as sand, no further work is recommended for the project area.

Figure 16: Photograph of Stratigraphic Profile (ST-4) from Parcel 5. View to South.

Figure 17: Photograph of Trench Overview, Parcel 5. View to East.

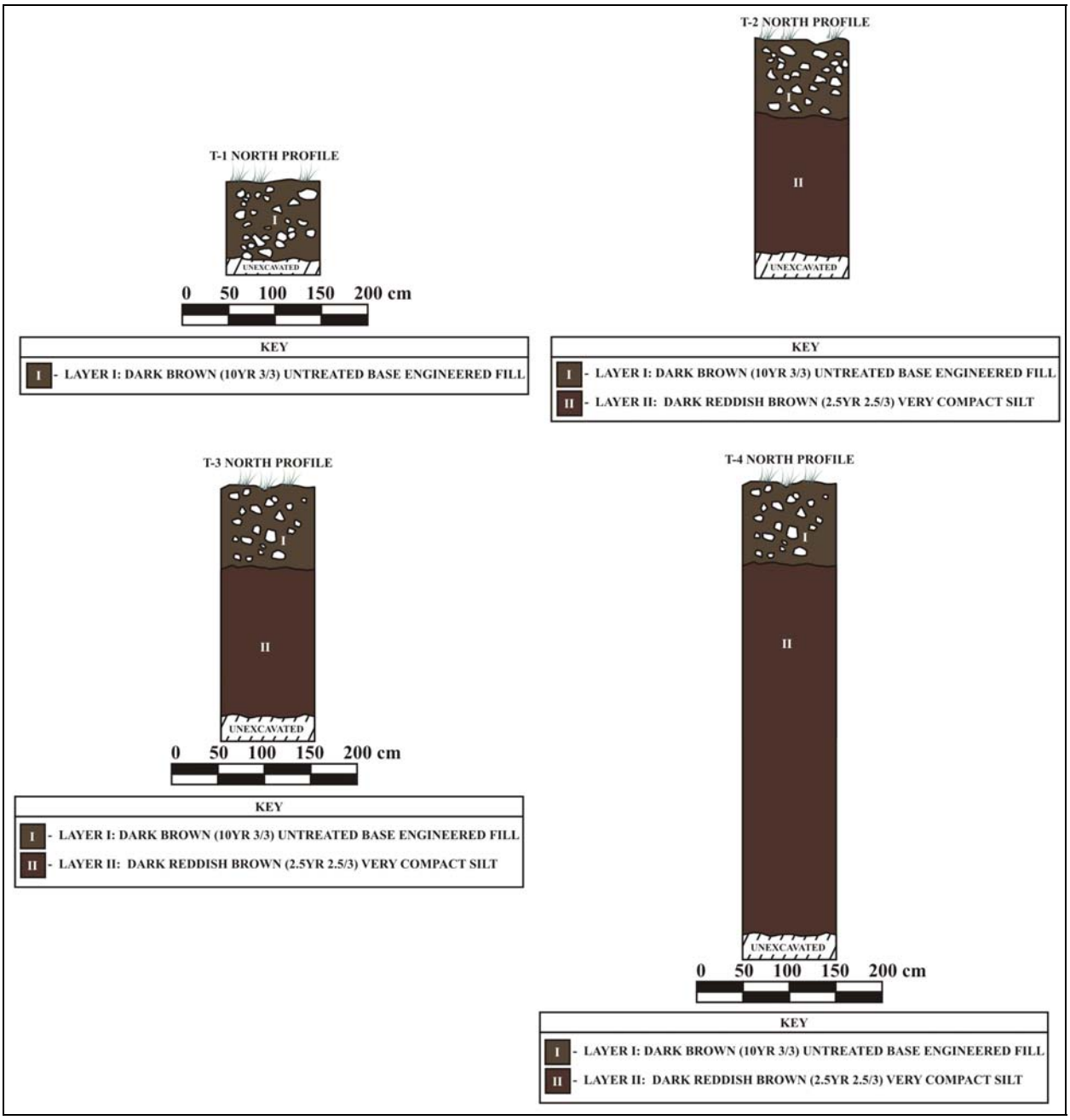

Figure 18: Representative Stratigraphic Profiles from Parcel 5.

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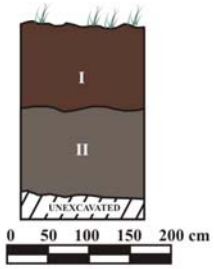
APPENDIX A: STRATIGRAPHIC PROFILES FROM PARCEL 4

T-1



KEY	
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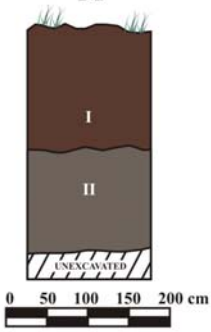
II	LAYER II: DARK REDDISH GRAY (7.5YR 4/2) VERY COMPACT SILT

T-2



KEY	
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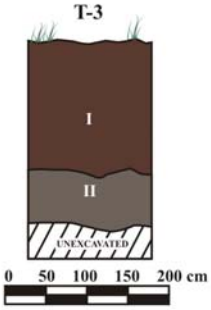
II	LAYER II: DARK REDDISH GRAY (7.5YR 4/2) VERY COMPACT SILT

T-3



KEY	
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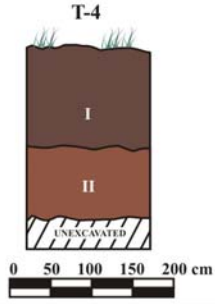
II	LAYER II: DARK REDDISH GRAY (7.5YR 4/2) VERY COMPACT SILT

T-4



KEY	
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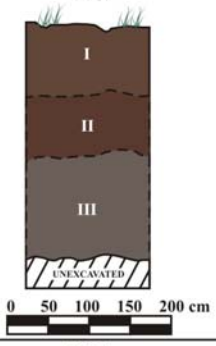
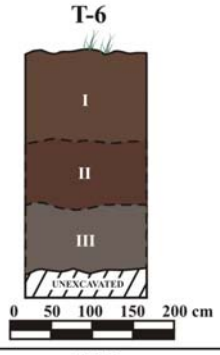
II	LAYER II: RED (2.5YR 4/8) VERY COMPACT SILT

T-5



KEY	
I	LAYER I: DARK REDDISH GRAY (7.5YR 3/4) VERY COMPACT SILT
II	LAYER II: DARK REDDISH BROWN (5YR 3/4) COMPACT SILT
III	LAYER III: DARK REDDISH GRAY (5YR 4/2) COMPACT SILT

T-6



KEY	
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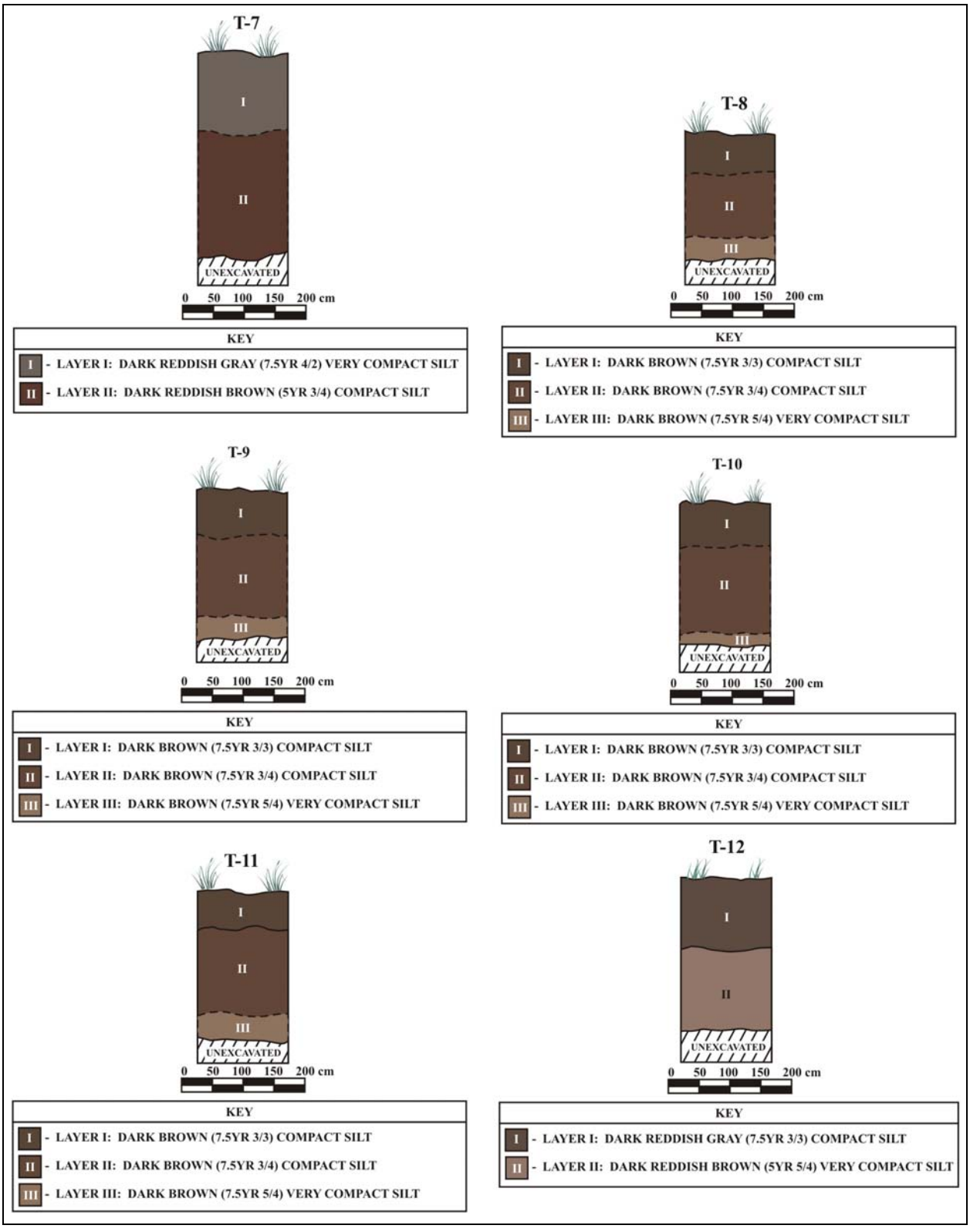
II	LAYER II: DARK REDDISH BROWN (5YR 3/4) COMPACT SILT
III	LAYER III: DARK REDDISH GRAY (5YR 4/2) COMPACT SILT


T-7
I
II
UNEXCAVATED
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II - LAYER II: DARK REDDISH BROWN (5YR 3/4) COMPACT SILT
T-8
I
II
III
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: DARK BROWN (7.5YR 3/4) COMPACT SILT
III - LAYER III: DARK BROWN (7.5YR 5/4) VERY COMPACT SILT
T-9
I
II
III
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/3) COMPACT SILT
II - LAYER II: DARK BROWN (7.5YR 3/4) COMPACT SILT
III - LAYER III: DARK BROWN (7.5YR 5/4) VERY COMPACT SILT
T-10
I
II
III
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: DARK BROWN (7.5YR 3/4) COMPACT SILT
III - LAYER III: DARK BROWN (7.5YR 5/4) VERY COMPACT SILT
T-11
I
II
III
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/3) COMPACT SILT
II - LAYER II: DARK BROWN (7.5YR 3/4) COMPACT SILT
III - LAYER III: DARK BROWN (7.5YR 5/4) VERY COMPACT SILT
T-12
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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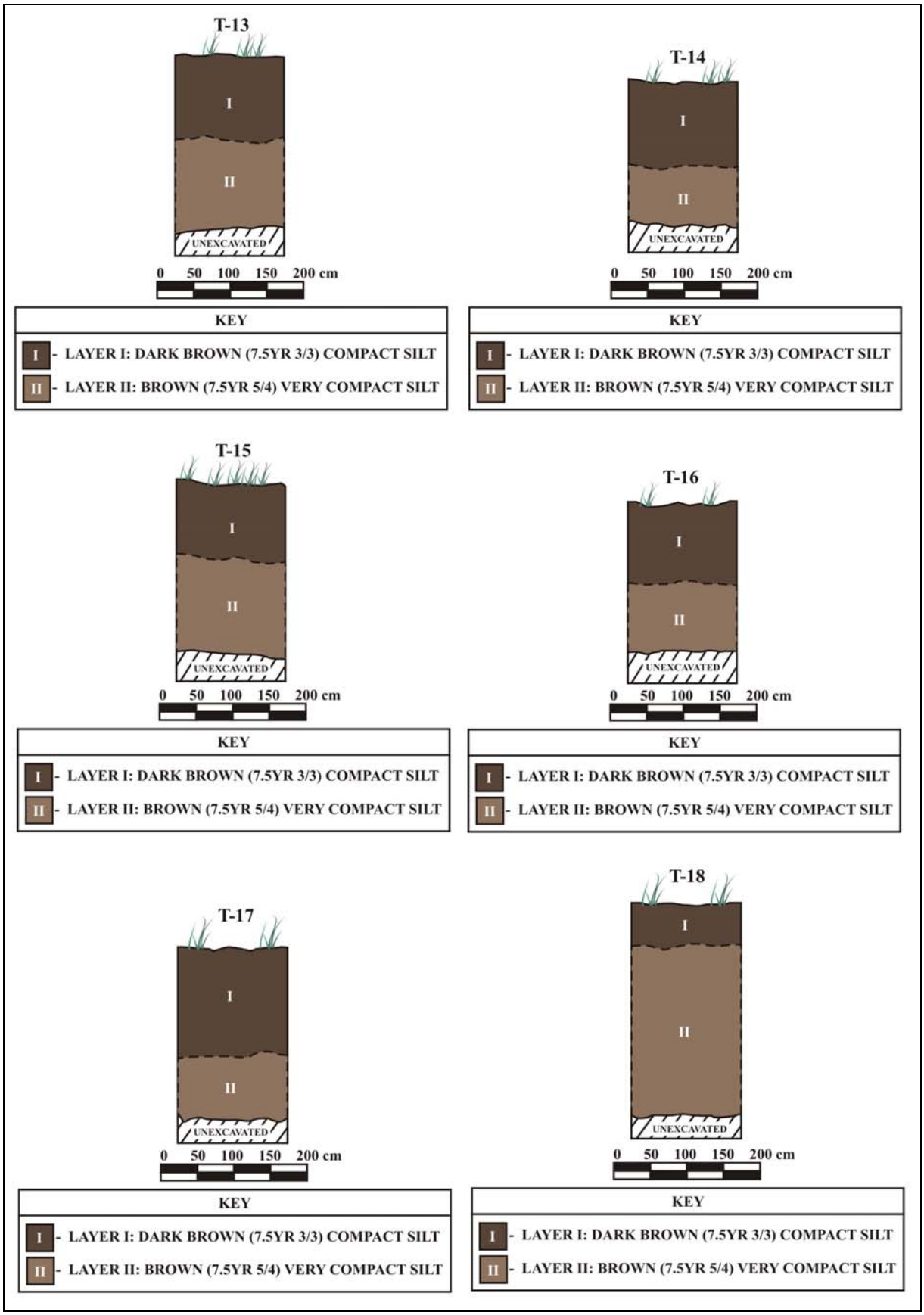
II - LAYER II: DARK REDDISH BROWN (5YR 5/4) VERY COMPACT SILT


T-13
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II
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II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-14
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-15
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-16
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-17
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-18
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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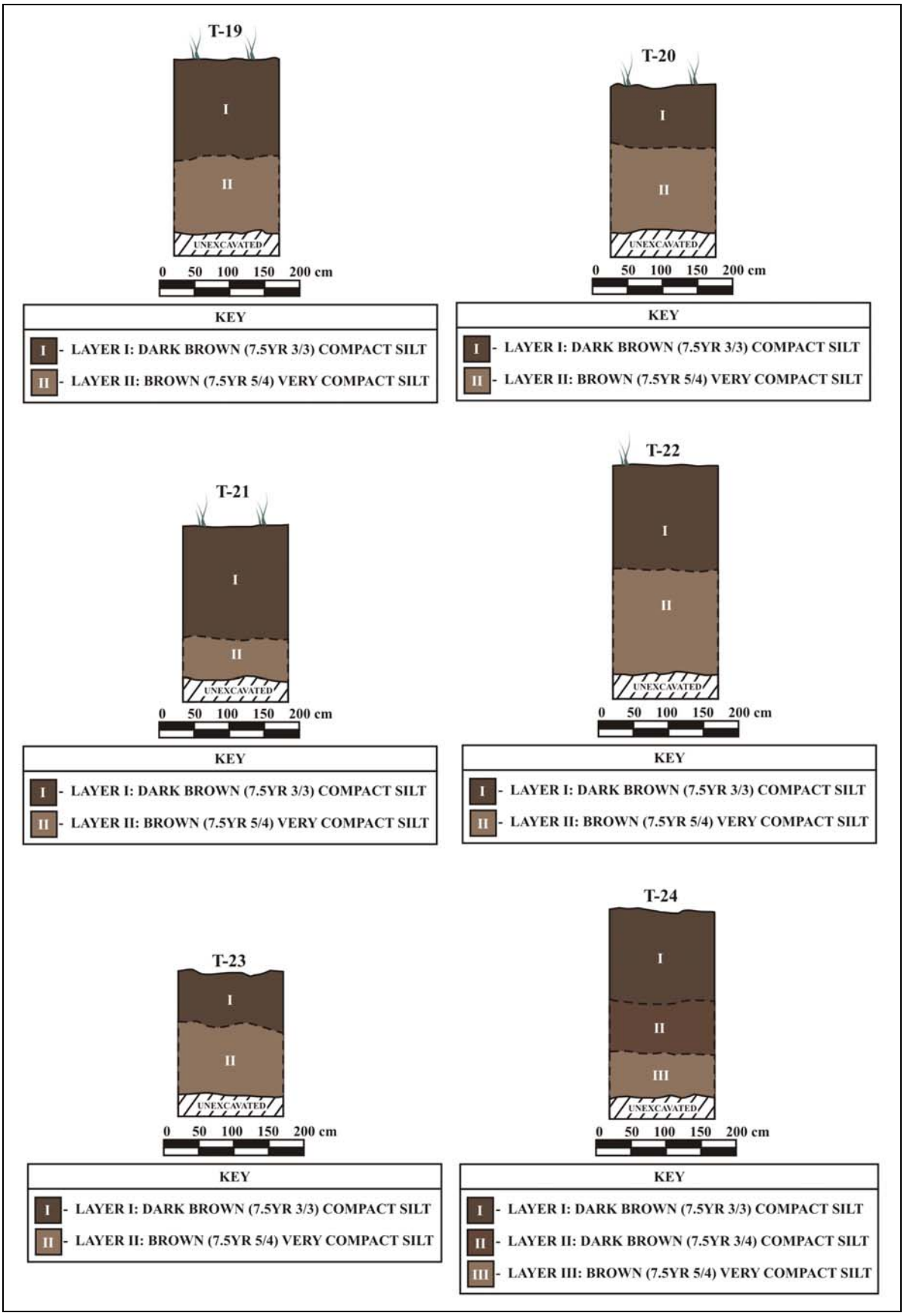
II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT


T-19
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T-20
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-21
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/3) COMPACT SILT
II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-22
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/3) COMPACT SILT
II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-23
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
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II - LAYER II: BROWN (7.5YR 5/4) VERY COMPACT SILT
T-24
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II
III
UNEXCAVATED
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KEY
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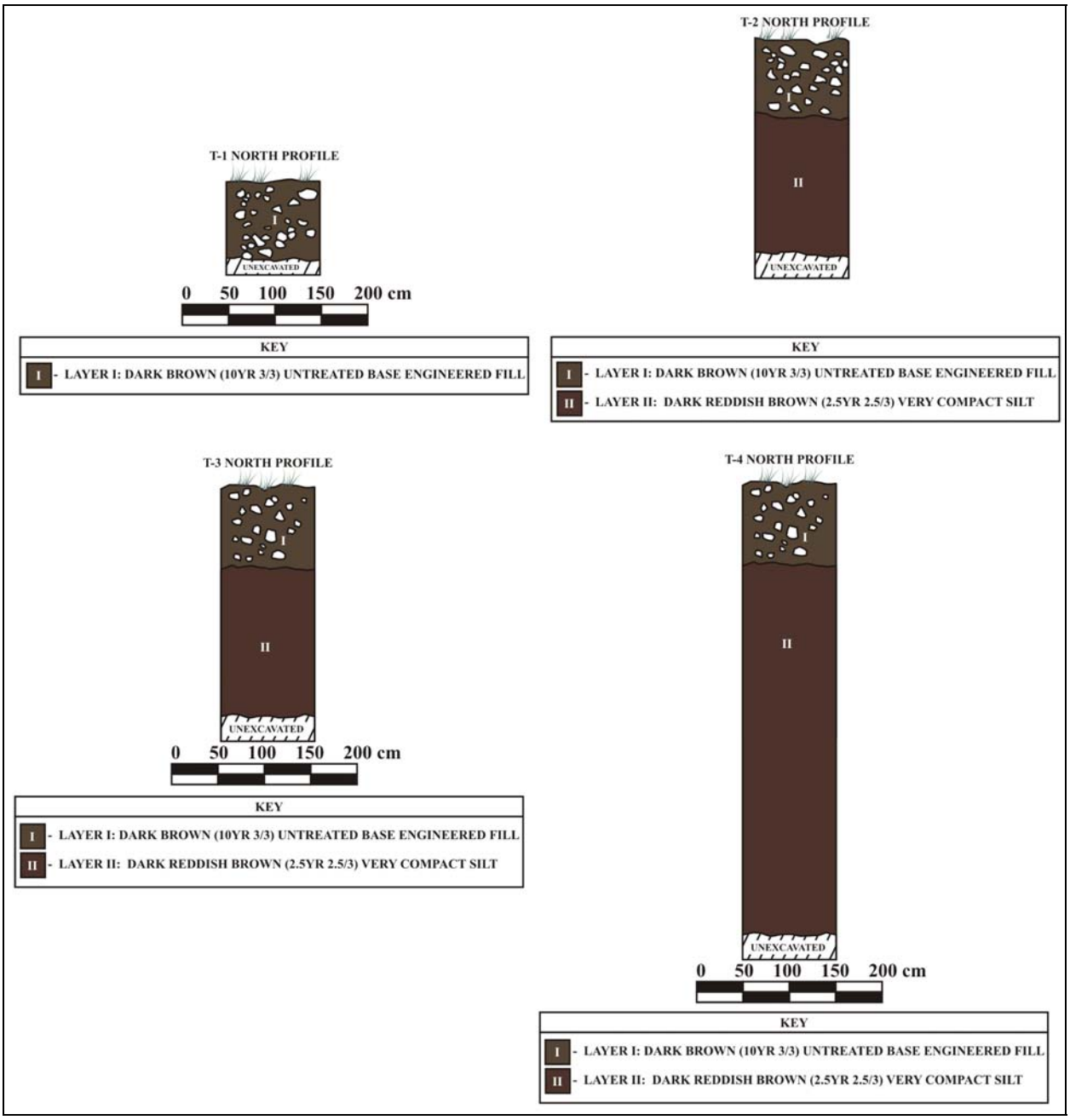
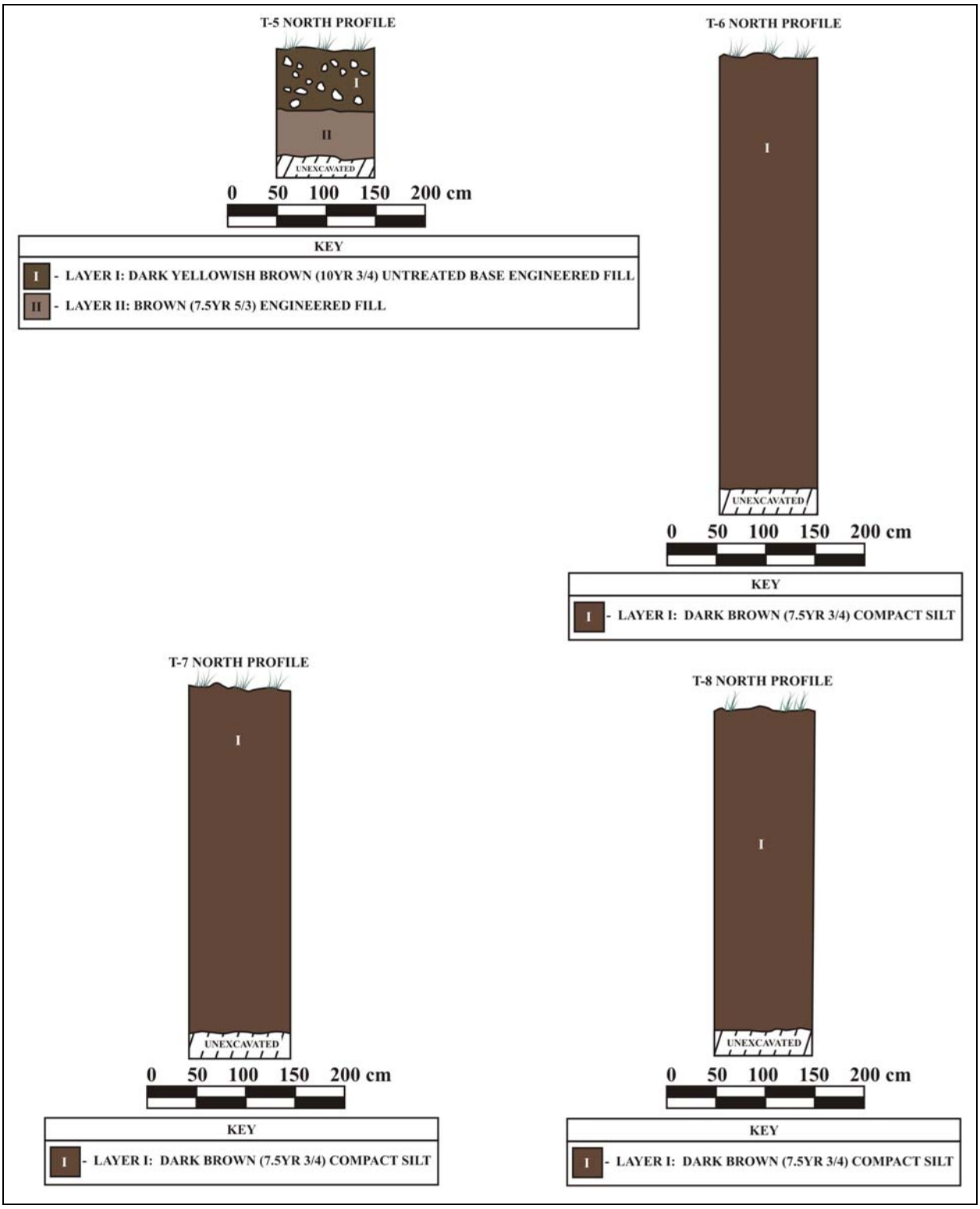
II - LAYER II: DARK BROWN (7.5YR 3/4) COMPACT SILT
III - LAYER III: BROWN (7.5YR 5/4) VERY COMPACT SILT

APPENDIX B STRATIGRAPHIC PROFILES FROM PARCEL 5


T-1 NORTH PROFILE
I
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (10YR 3/3) UNTREATED BASE ENGINEERED FILL
T-2 NORTH PROFILE
I
II
UNEXCAVATED
KEY
I - LAYER I: DARK BROWN (10YR 3/3) UNTREATED BASE ENGINEERED FILL
II - LAYER II: DARK REDDISH BROWN (2.5YR 2.5/3) VERY COMPACT SILT
T-3 NORTH PROFILE
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (10YR 3/3) UNTREATED BASE ENGINEERED FILL
II - LAYER II: DARK REDDISH BROWN (2.5YR 2.5/3) VERY COMPACT SILT
T-4 NORTH PROFILE
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (10YR 3/3) UNTREATED BASE ENGINEERED FILL
II - LAYER II: DARK REDDISH BROWN (2.5YR 2.5/3) VERY COMPACT SILT


T-5 NORTH PROFILE
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II
UNEXCAVATED
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II - LAYER II: BROWN (7.5YR 5/3) ENGINEERED FILL
T-6 NORTH PROFILE
I
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/4) COMPACT SILT
T-7 NORTH PROFILE
I
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/4) COMPACT SILT
T-8 NORTH PROFILE
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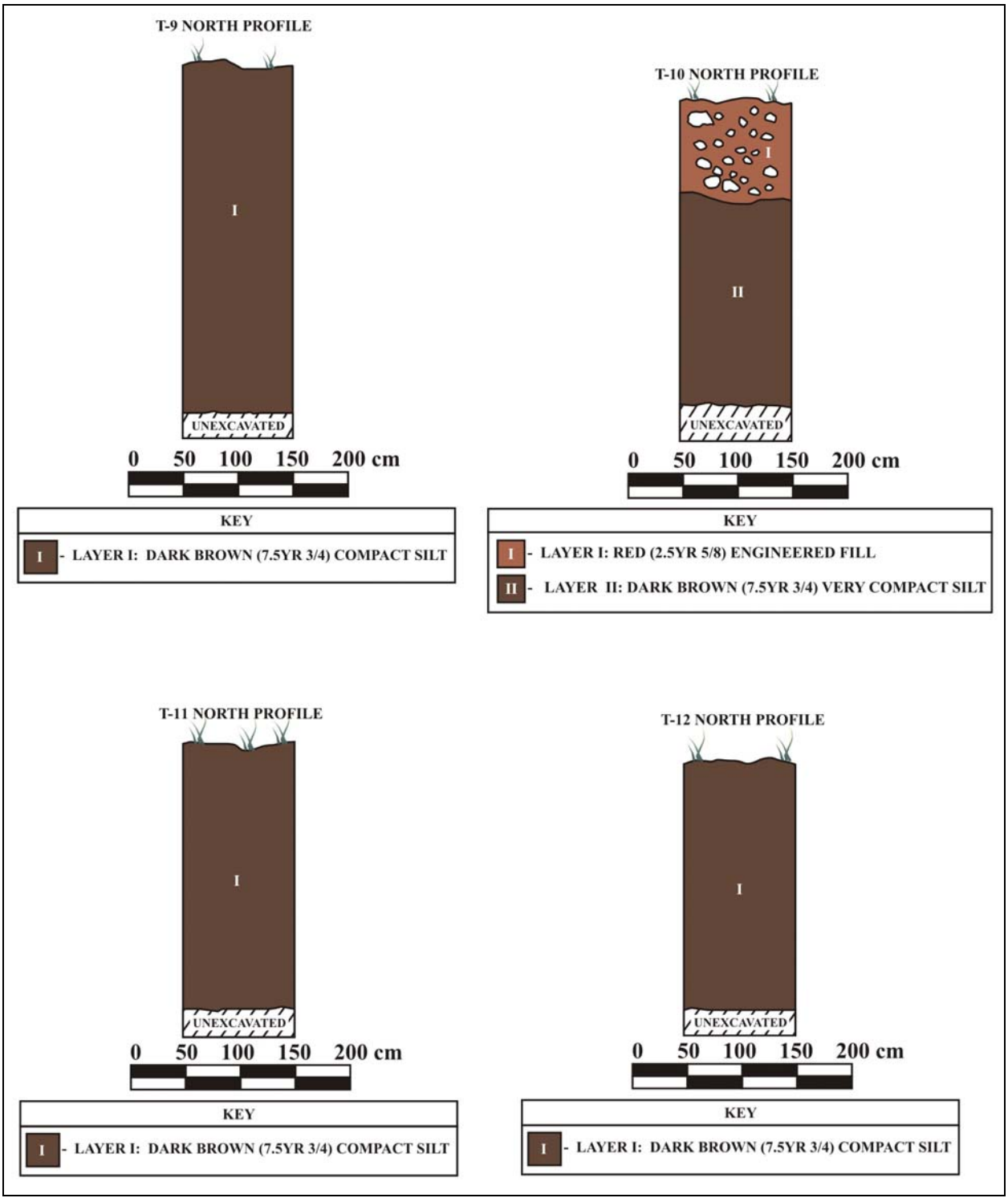
T-9 NORTH PROFILE
I
UNEXCAVATED
0 50 100 150 200 cm
KEY
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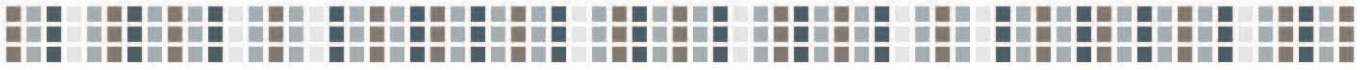
T-10 NORTH PROFILE
I
II
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: RED (2.5YR 5/8) ENGINEERED FILL
II - LAYER II: DARK BROWN (7.5YR 3/4) VERY COMPACT SILT
T-11 NORTH PROFILE
I
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/4) COMPACT SILT
T-12 NORTH PROFILE
I
UNEXCAVATED
0 50 100 150 200 cm
KEY
I - LAYER I: DARK BROWN (7.5YR 3/4) COMPACT SILT

Appendix D

Land Use Assurance Letter



NEIL ABERCROMBIE
GOVERNOR

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

IN REPLY REFER TO:
AIR-EP
13.0030

February 21, 2013

Mr. Ronnie V. Simpson
Federal Aviation Administration
Western-Pacific Region
Airports District Office
P. O. Box 50244
Honolulu, Hawaii 96850-0001

Dear Mr. Simpson:

Subject: Land Use Assurance Letter
Kahului Airport Consolidated Rental Car Facility Environmental Assessment
State Project No. AS1062-02

The State of Hawaii, Department of Transportation, Airports Division (DOT-A), as sponsor for Kahului Airport, Kahului, Hawaii, makes the following statement of land use assurances as required by Section 511 (a)(5) of the Airport and Airway Improvement Act of 1982, as amended:

> DOT-A provides assurance, that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable to restrict the use of adjacent land to or in the immediate vicinity of Kahului Airport to activities and purposes compatible with normal airport operations both existing and in the future. DOT-A also provides assurance that it will work closely with other jurisdictions within the County of Maui to ensure appropriate land use regulations are enforced.

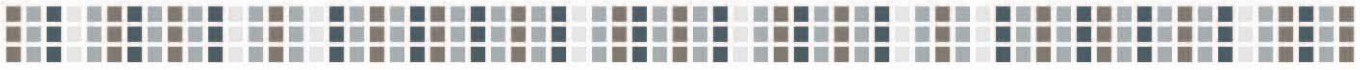
Should you have any questions, please have your staff call Ms. Kimberly Evans, Head Planner at 838-8810.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Appendix E

Traffic Impact Analysis



RICONDO & ASSOCIATES

MEMORANDUM **VIA EMAIL**

Date: October 26, 2012

To: Gene Matsushige, P.E.
Department of Transportation, Airports Division (DOT-A)

From: Glen Warren, P.E

Subject: DRAFT – TRAFFIC IMPACT ANALYSIS
FOR DRAFT ENVIRONMENTAL ASSESSMENT FOR KAHULUI AIRPORT CONSOLIDATED RENTAL CAR FACILITY

The purpose of this study is to assess the potential project specific traffic impacts to the on-Airport roadway system at Kahului Airport (OGG or the Airport) associated with projects defined in the *Consolidated Rental Car Facility Draft Environmental Assessment* (the EA) for Kahului Airport. The projects include the construction of the Consolidated Rental Car Facility (ConRAC) and associated improvements; it assumes completion of the previously approved Kahului Airport Access Road, Phase II (from Hana Highway to the terminal loop road). This study provides an evaluation of roadway conditions for the following four traffic scenarios; existing, No Project with new Airport access road, plus two preferred ConRAC site locations with the new Airport access road. The planning horizon traffic volumes estimates for 2015 and 2020 used in this study are based on current traffic data collected in July 2012 and represents the Baseline condition for this analysis.

Study Area

The study areas as defined by the highlighted roadways for each of the four traffic analysis scenarios are illustrated in **Exhibit 1** below. Key roadways consist of Lanui Circle (the airport loop roadway), Keolani Place, new Kahului Airport Access Road, Koeheke Street, Kaonawai Place, and additional surface streets such as Aalele Street and Haleakala Highway. The study area does not include the new intersection of Kahului Airport Access Road at Hana Highway, as this intersection has been addressed as part of another EA[1] .

Traffic Data

The traffic data used in this analysis includes Automated Traffic Recorders (ATR) counts, manual intersection turning movements and classification counts on the existing terminal roadways. These counts

[1] *Kahului Airport Access Road, Phase I, Punene Avenue to Hana Highway, Wailuku District, Maui, Hawaii, Environmental Assessment, March 2012.*

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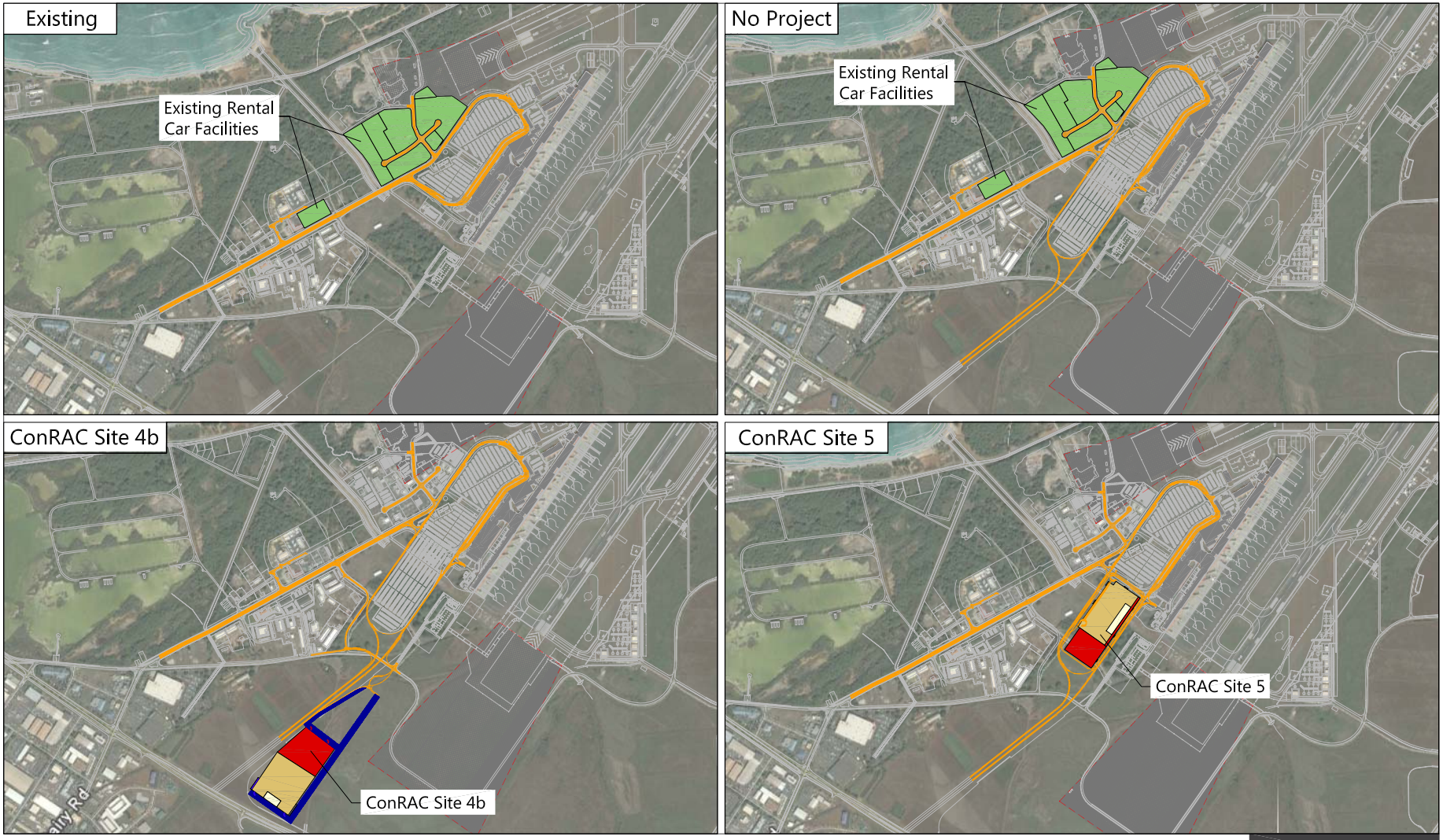


SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Layout Plan, April 2004; Ricondo & Associates, Inc., October 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

EXHIBIT 1

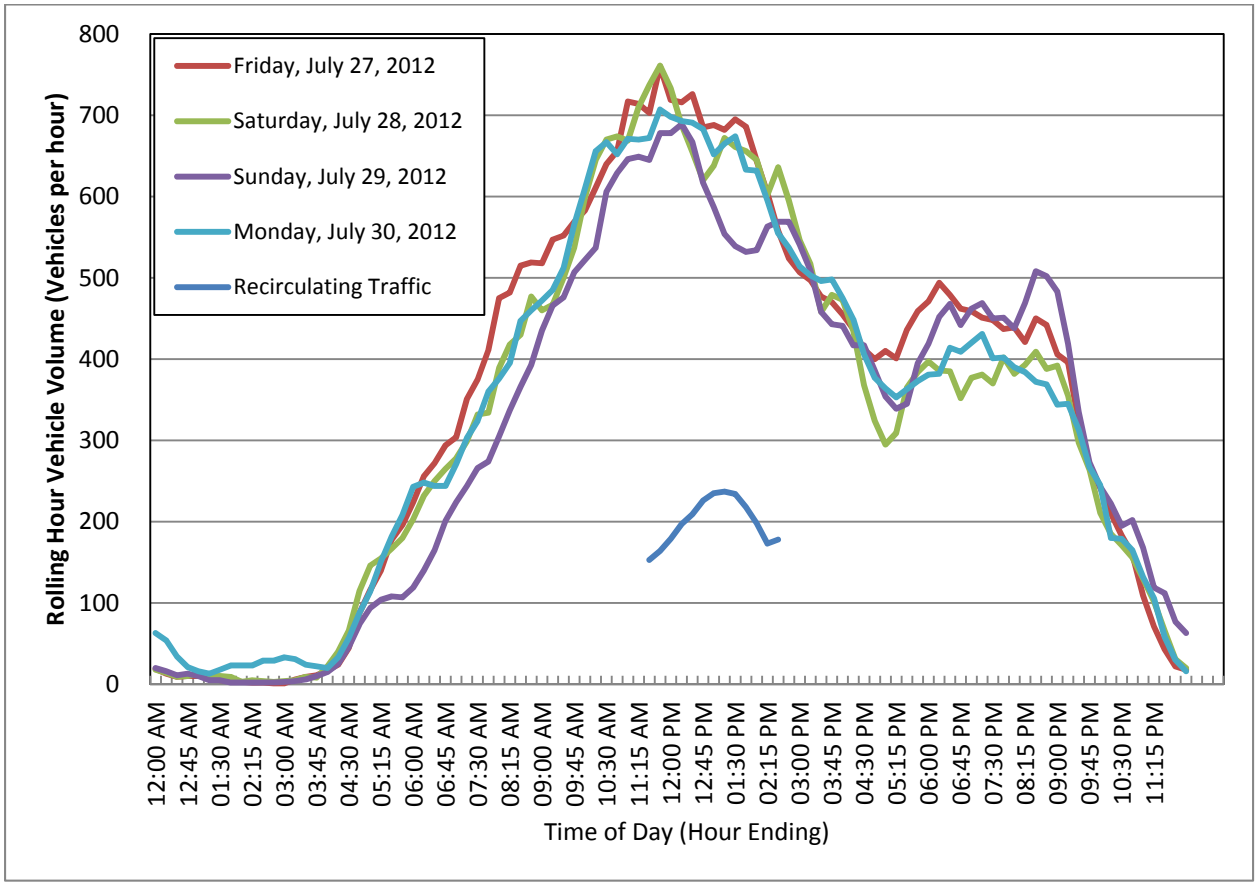
NORTH 0 2000 ft.

Traffic Analysis Scenarios

were performed on select sections of the terminal loop road, inbound and outbound Keolani Place, and in the areas of the existing rental car companies on Koeheke Street, and Kaonawai Place. Turning movement counts performed in the areas of the rental car companies, and terminal recirculation roads also classified by vehicle type. Classifications included: (1) private vehicles accessing the terminal curbside (including rental cars, taxicabs and limos), (2) rental car company shuttles, and (3) all other shuttles/buses/service vehicles. Vehicle turning movement and classification counts were collected on Friday, July 27, 2012. ATR counts on inbound Kahului Airport Road were collected during the four day period of Friday, July 27, 2012 through Monday, July 30, 2012. Vehicle entry/exit data from the Airport's public parking lot was obtained for Friday, July 27, 2012 from Standard Parking, the Airport parking operator.

An analysis of the traffic data indicated that the peak hour vehicular volumes on the terminal area loop roads occurred on Friday, July 27, 2012, between the hours of 11:45 a.m. and 12:45 p.m. A summary of the rolling hour vehicle volumes on the inbound Keolani Place prior to entering the airport loop road are provided below in **Exhibit 2**. This shows a consistent trend in the rolling hourly traffic volumes for each day and that the peak trips entering the Airport on Keolani Place occurred from 10:45 a.m. to 11:45 a.m. However, when the Airport's recirculating vehicle trips are included with the inbound trips, the loop road's peak hour shifts to 11:45 a.m. to 12:45 p.m.

Exhibit 2 Inbound Traffic Volumes on Keolani Place



SOURCES: Julian Ng Incorporated, July 2012, Ricondo & Associates, Inc., October 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

Traffic Scenarios

To assess the traffic impacts of the scenarios illustrated earlier in Exhibit 1, the following provides a more detailed explanation of the scenarios analyzed for this Study:

Existing Conditions (2012)

The existing condition serves as a baseline, and represents the Airport's current traffic volumes. These volumes were classified by the following vehicle types: private vehicle, rental car shuttle, and other shuttle/bus/service vehicle. Based on the classification data, turning movement counts, ATR counts and available parking data, specific routes for rental cars, public and employee parking vehicles, rental car company shuttles, and other shuttles/buses/service vehicles were identified for the existing peak hour. Since these routes by vehicle type must be transferred to the Future No Project and the two Future ConRAC Site Alternatives, future routes for each of these vehicle types were identified and the appropriate peak hour vehicle volumes were assigned.

No Project Alternative

The No Project Alternative assumes the completion of the new Kahului Airport Access Road (Phase II - from Hana Highway to terminal loop road), and an expansion of the existing public parking lot inside a realigned terminal loop roadway, both due to open by 2015. All rental car company activity is assumed to remain in their existing locations, including the continued use of their individually branded shuttles. Once constructed, the new Kahului Airport Access Road will become the primary access to the Airport. Therefore, all vehicular airport traffic (including rental car traffic) entering/exiting the airport was assumed to use the new Kahului Airport Access Road. Access to Alahao Street will still be provided via Koeheke Street from Keolani Place or the terminal loop road.

Proposed ConRAC Site 4b Alternative

Under the proposed ConRAC Site 4b Alternative, the new Kahului Access Road (Phase II) and the new ConRAC facility located in the southeast quadrant of the new Kahului Airport Access Road and Hana Highway intersection are assumed to be open by 2015. A consolidated rental car shuttle will transport customers between the terminal building and the ConRAC. Shuttle headways were calculated to be approximately three minutes between shuttles based on peak hour rental car customer demand and realistic shuttle load times, resulting in a reduction in shuttles from 85 per hour to just 20. Access to the ConRAC will be provided off of eastbound Kahului Airport Access Road, just prior to the Haleakala Highway overpass. Once constructed, the new Kahului Airport Access Road will become the primary access to the Airport. Access to Alahao Street will still be provided via Koeheke Street from Keolani Place or the terminal loop road.

Proposed ConRAC Site 5 Alternative

Under the proposed ConRAC Site 5 Alternative, the new Kahului Access Road (Phase II), and the new ConRAC facility located in the western half of the expanded terminal loop roadway are assumed to be open by 2015. Access to the ConRAC facility for returning rental cars and employee parking and surface public parking will be via a left exit off the inbound access road on the south side of the ConRAC facility, then proceed to separate lanes when they round the corner to the east side of the proposed building. Nearest the building, employees will enter a sloped ramp which will bring them up to the third level of the building for employee parking on the roof. Rental Car return vehicles will remain at-grade on the east side of the building, and either enter a helix up to the second level or remain on the ground level depending on the location of their respective rental car company. Public parking and service road traffic will travel the third roadway on the east side of the building, either entering the surface public parking lot or return to the outbound loop road. It was assumed that employee parking will be relocated to the third level of the ConRAC in this alternative, and the former surface parking lot will be used as additional public parking. All employee and rental car trips exit the ConRAC via the at-grade road on the north side, or via the helix located on the northwest side of the building, before merging back onto the outbound terminal loop road.

A consolidated busing operation between the ConRAC and the terminal will not be provided, instead customers will use a sidewalk and/or trolley service to travel between the ConRAC Customer Service Building (CSB) and the terminal building. Once constructed, the new Kahului Airport Access Road will become the primary access to the Airport. Access to Alahao Street will still be provided via Koeheke Street. Rental car vehicles that wish to first drop-off at the terminal curbside, can easily continue around the airport loop road, then take the recirculation road back toward the terminal and easily access the ConRAC entrance on the left hand side of the inbound roadway. For the purpose of this study, 25% of returning rental cars during the peak hour was assumed to drop-off customers at the terminal curbside prior to returning their rental cars.

Future Traffic Volumes

Future traffic volumes were estimated in order to evaluate potential impacts on the study area roadways generated by the Project and No Project Alternatives. Consistent with the Master Plan Passenger Projections, published in the *Passenger and Operations Activity Level Projections for Kahului Airport*, Martin Associates, dated October 23, 2011, project related trips were assumed to grow relative to the increase in passenger enplanements at the airport. **Table 1** provides projected annual passenger volumes and the resulting relative growth for the 2015 and 2020 design years. The projected compounded annual growth rate (CAGR) between 2012 and 2015 was 0.3%, and 0.9% between 2012 and 2020.

The projected traffic volumes by vehicle mode and link were calculated by multiplying the 2012 baseline traffic volumes by the 2015 and 2020 growth factors. The resulting link-by-link traffic volumes are represented as passenger car equivalents for the four traffic scenarios, and are presented in the following exhibits, Existing Condition (**Exhibit 3**), No Project Condition (**Exhibit 4**), ConRAC Site 4b Condition (**Exhibit 5**) and ConRAC Site 5 Condition (**Exhibit 6**).

Table 1 Master Plan Projected Annual Passenger Volumes

YEAR	ANNUAL PASSENGER VOLUMES	MULTIPLIER VERSUS 2012 VOLUMES	CAGR
2012 1/	2,695,279		
2015 1/	2,719,196	x 1.009	0.3%
2020 1/	2,895,642	x 1.074	0.9%

NOTE:

1/ *Passenger and Operations Activity Level Projection for Kahului Airport*, Martin Associates, October 2011

SOURCES: *Passenger and Operations Activity Level Projection for Kahului Airport*, Martin Associates, October 2011, Ricondo & Associates, Inc., October 2012.

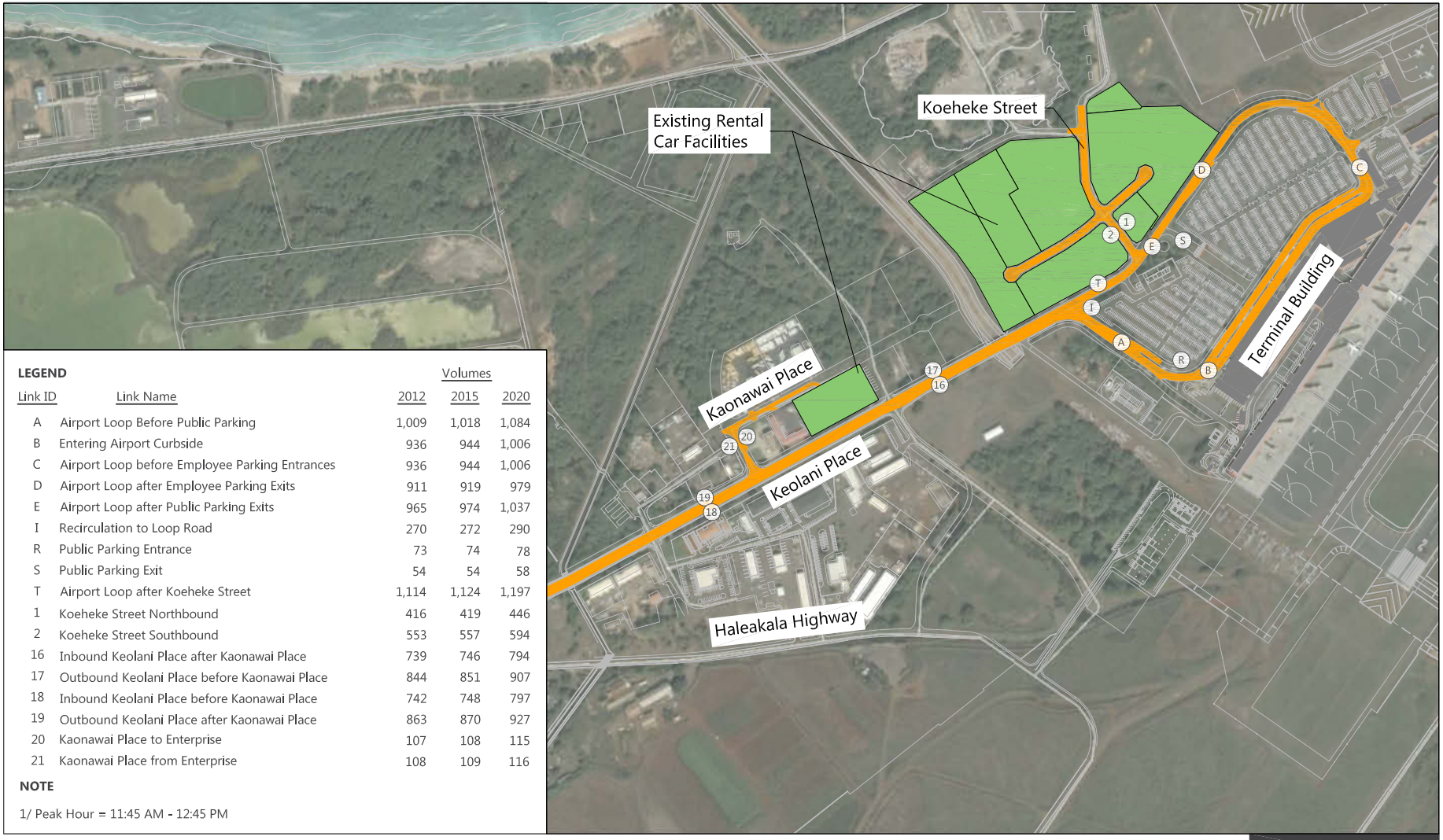
PREPARED BY: Ricondo & Associates, Inc., October 2012.

Assumptions

The following assumptions were used as part of the study's impact analysis:

1. Data collected on Friday, July 27, 2012, was used to represent a peak month busy day for landside operations at the Airport and the baseline condition. No further adjustments were made to adjust for peak month operations, as July typically represents the peak month for passenger enplanements at the Airport.
2. Shuttling of rental car vehicles to/from ConRAC to vehicle base yards occurs during off-peak time. Vehicle volumes for those trips are not reflected in this analysis.
3. Service vehicle trips (i.e. fuel delivery, other merchandise delivery) into the two proposed ConRAC Sites occurs during off-peak times. Service vehicle volumes for those trips are not accounted for in this analysis.
4. Traffic volumes were converted to passenger car equivalent in this traffic analysis. Private vehicles are equal to one passenger car equivalent, while rental car shuttles and other shuttles/buses/service vehicles were converted to equal 1.5 passenger car equivalents.

5. Existing inbound/outbound terminal traffic via Keolani Place (except for local traffic) were re-routed onto the new inbound/outbound Kahului Airport Access Road for the No Project Alternative and two ConRAC Alternatives.



LEGEND

Link ID	Link Name	Volumes 2012	2015	2020
A	Airport Loop Before Public Parking	1,009	1,018	1,084
B	Entering Airport Curbside	936	944	1,006
C	Airport Loop before Employee Parking Entrances	936	944	1,006
D	Airport Loop after Employee Parking Exits	911	919	979
E	Airport Loop after Public Parking Exits	965	974	1,037
I	Recirculation to Loop Road	270	272	290
R	Public Parking Entrance	73	74	78
S	Public Parking Exit	54	54	58
T	Airport Loop after Koeheke Street	1,114	1,124	1,197
1	Koeheke Street Northbound	416	419	446
2	Koeheke Street Southbound	553	557	594
16	Inbound Keolani Place after Kaonawai Place	739	746	794
17	Outbound Keolani Place before Kaonawai Place	844	851	907
18	Inbound Keolani Place before Kaonawai Place	742	748	797
19	Outbound Keolani Place after Kaonawai Place	863	870	927
20	Kaonawai Place to Enterprise	107	108	115
21	Kaonawai Place from Enterprise	108	109	116

NOTE

1/ Peak Hour = 11:45 AM - 12:45 PM

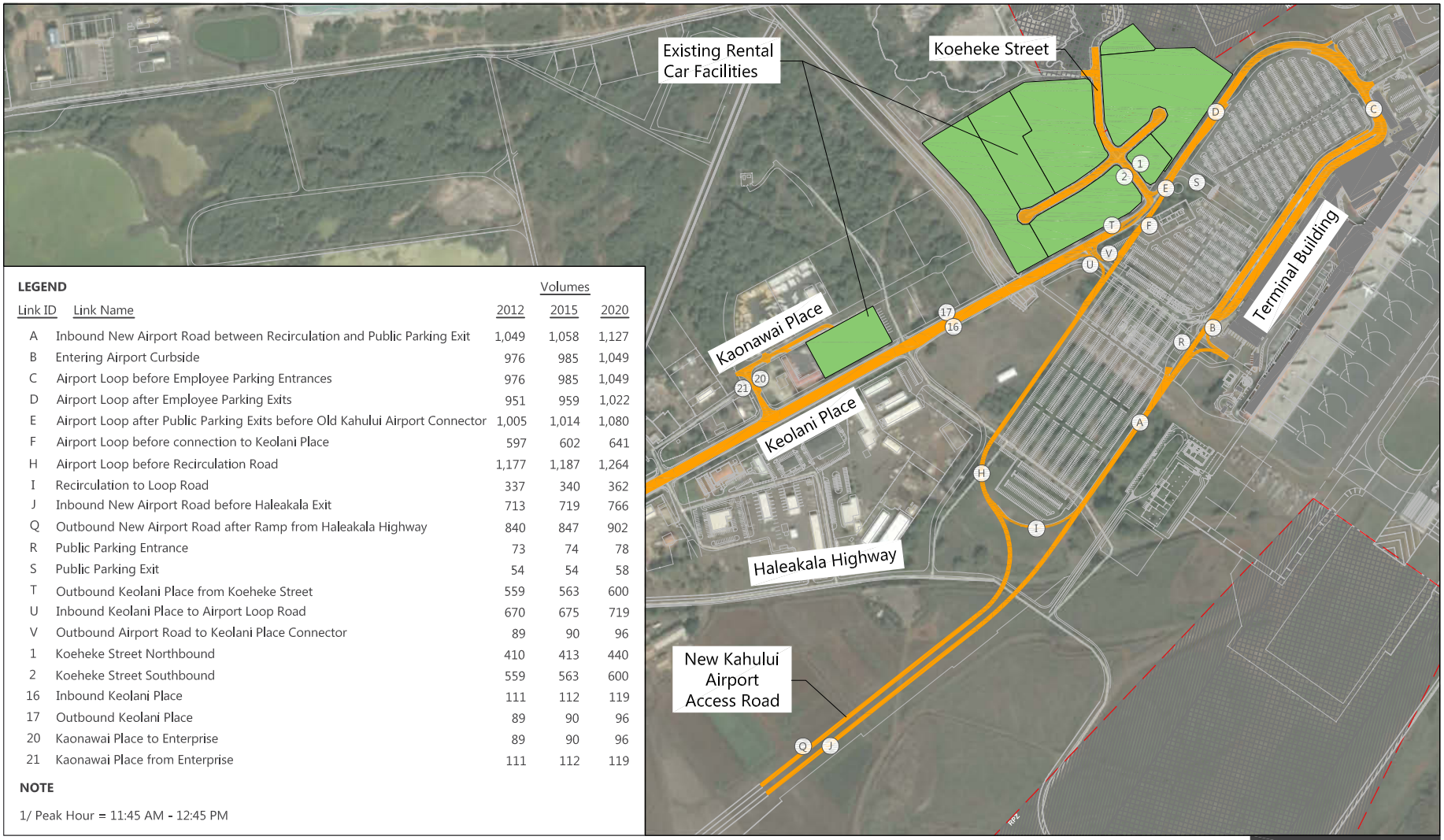
SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Layout Plan, April 2004; Ricondo & Associates, Inc., October 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

EXHIBIT 3

NORTH

0 800 ft.

Existing Conditions - Roadway Network and Peak Hour Traffic Volumes



LEGEND

Link ID	Link Name	Volumes 2012	2015	2020
A	Inbound New Airport Road between Recirculation and Public Parking Exit	1,049	1,058	1,127
B	Entering Airport Curbside	976	985	1,049
C	Airport Loop before Employee Parking Entrances	976	985	1,049
D	Airport Loop after Employee Parking Exits	951	959	1,022
E	Airport Loop after Public Parking Exits before Old Kahului Airport Connector	1,005	1,014	1,080
F	Airport Loop before connection to Keolani Place	597	602	641
H	Airport Loop before Recirculation Road	1,177	1,187	1,264
I	Recirculation to Loop Road	337	340	362
J	Inbound New Airport Road before Haleakala Exit	713	719	766
Q	Outbound New Airport Road after Ramp from Haleakala Highway	840	847	902
R	Public Parking Entrance	73	74	78
S	Public Parking Exit	54	54	58
T	Outbound Keolani Place from Koeheke Street	559	563	600
U	Inbound Keolani Place to Airport Loop Road	670	675	719
V	Outbound Airport Road to Keolani Place Connector	89	90	96
1	Koeheke Street Northbound	410	413	440
2	Koeheke Street Southbound	559	563	600
16	Inbound Keolani Place	111	112	119
17	Outbound Keolani Place	89	90	96
20	Kaonawai Place to Enterprise	89	90	96
21	Kaonawai Place from Enterprise	111	112	119

NOTE

1/ Peak Hour = 11:45 AM - 12:45 PM

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Layout Plan, April 2004; Ricondo & Associates, Inc., October 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

EXHIBIT 4

NORTH

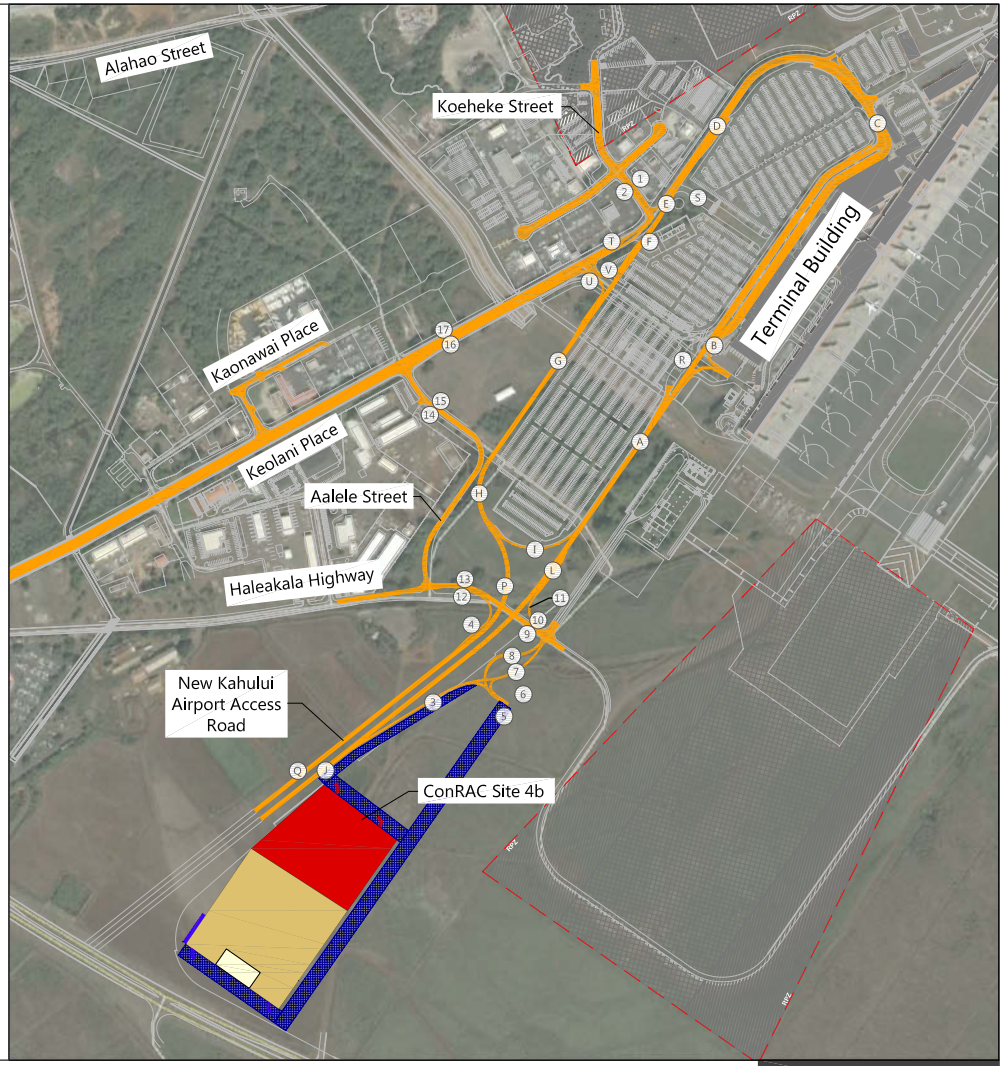
0 800 ft.

No Project Alternative - Roadway Network and Peak Hour Traffic Volumes

LEGEND

Link ID	Link Name	Volumes 2012	2015	2020
A	Inbound New Airport Road between Recirculation and Public Parking Exit	702	708	754
B	Entering Airport Curbside	629	634	675
C	Airport Loop before Employee Parking Entrances	629	634	675
D	Airport Loop after Employee Parking Exits	604	609	648
E	Airport Loop after Public Parking Exits before Keolani Place Connector	658	663	706
F	Airport Loop before connection to Keolani Place	559	563	600
G	Airport Loop after connection to Keolani Place	702	708	754
H	Airport Loop before Recirculation Road	702	708	754
I	Recirculation to Loop Road	139	140	149
J	Inbound New Airport Road before Haleakala Exit	805	812	865
L	Inbound New Airport Road after Haleakala Exit	533	538	573
P	Outbound Airport Road after Recirculation Road	563	568	605
Q	Outbound Airport Road after Ramp from Haleakala Highway	908	916	975
R	Public Parking Entrance	73	74	78
S	Public Parking Exit	54	54	58
T	Outbound Keolani Place from Koeheke Street	173	175	186
U	Inbound Keolani Place to Airport Loop Road	173	175	186
V	Outbound Airport Road to Keolani Place Connector	30	30	32
1	Northbound Koeheke Street into Baseyard and Alahao Street	99	100	106
2	Southbound Koeheke Street from Baseyard and Alahao Street	173	175	186
3	Off-Ramp from Inbound to Haleakala Highway and ConRAC	272	274	292
4	On-Ramp from Haleakala Highway to Outbound Airport Road	345	348	371
5	Inbound Roadway to ConRAC	302	305	324
6	Outbound Roadway from ConRAC	375	378	403
7	Off-Ramp from Inbound to Haleakala Highway and from Outbound ConRAC	375	378	403
8	Road from Haleakala Highway to ConRAC	30	30	32
9	Westbound Haleakala Highway under Inbound Airport Roadway	30	30	32
10	Eastbound Haleakala Highway under Inbound Airport Roadway	345	348	371
11	On-Ramp from Haleakala Highway back to Inbound Airport Road	30	30	32
12	Eastbound Haleakala Highway west of Inbound Airport Roadway	30	30	32
13	Westbound Haleakala Highway west of Inbound Airport Roadway	0	0	0
14	Southbound Connector between Keolani Place and Haleakala Highway	30	30	32
15	Northbound Connector between Keolani Place and Haleakala Highway	0	0	0
16	Inbound Keolani Place east of Aalele Street Connector	0	0	0
17	Outbound Keolani Place east of Aalele Street Connector	30	30	32

NOTE
1/ Peak Hour = 11:45 AM - 12:45 PM



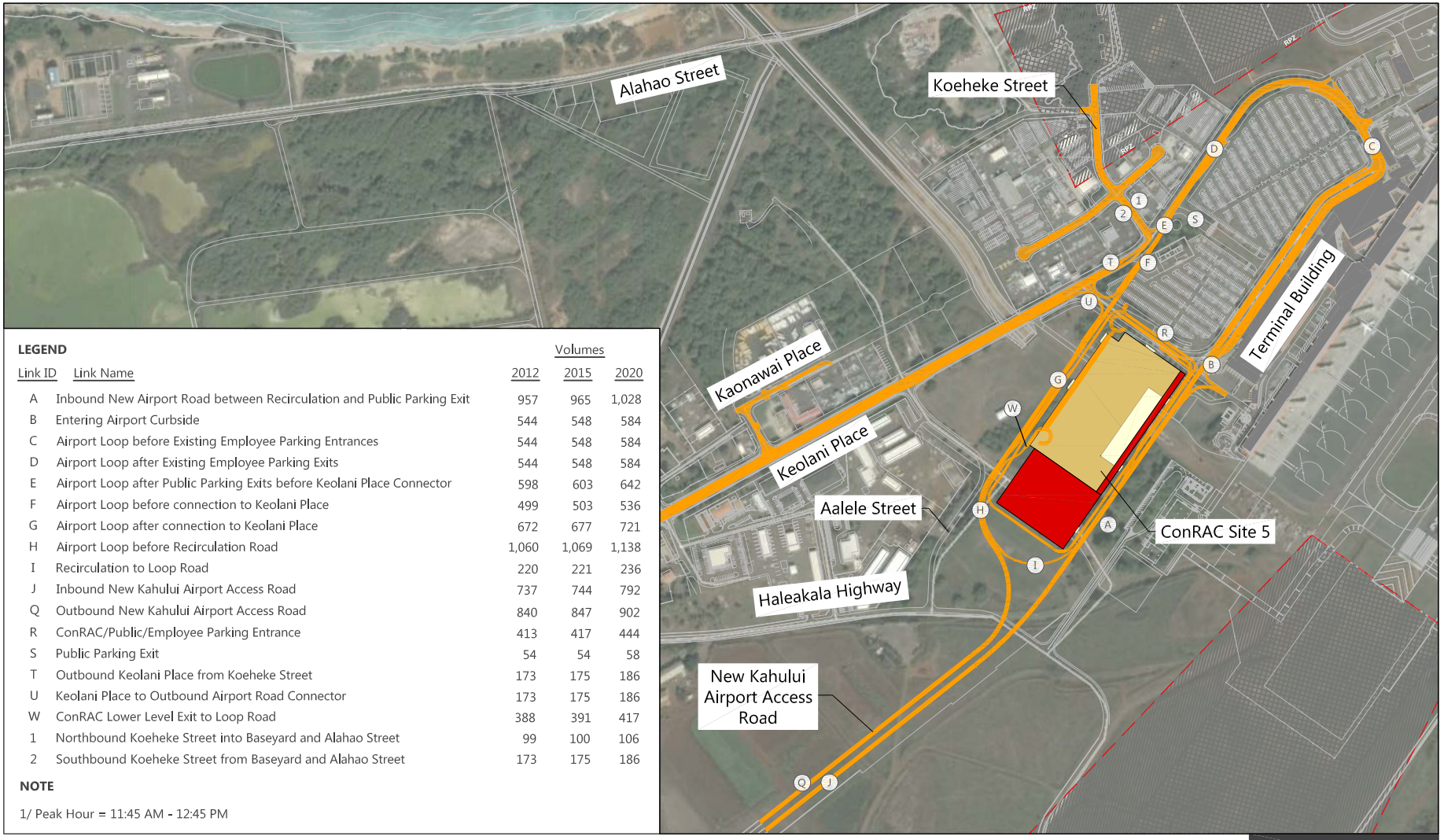
SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Layout Plan, April 2004; Ricondo & Associates, Inc., October 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

EXHIBIT 5

NORTH

0 1000 ft.

ConRAC Site 4b Alternative - Roadway Network and Peak Hour Traffic Volumes



LEGEND

Link ID	Link Name	Volumes 2012	2015	2020
A	Inbound New Airport Road between Recirculation and Public Parking Exit	957	965	1,028
B	Entering Airport Curbside	544	548	584
C	Airport Loop before Existing Employee Parking Entrances	544	548	584
D	Airport Loop after Existing Employee Parking Exits	544	548	584
E	Airport Loop after Public Parking Exits before Keolani Place Connector	598	603	642
F	Airport Loop before connection to Keolani Place	499	503	536
G	Airport Loop after connection to Keolani Place	672	677	721
H	Airport Loop before Recirculation Road	1,060	1,069	1,138
I	Recirculation to Loop Road	220	221	236
J	Inbound New Kahului Airport Access Road	737	744	792
Q	Outbound New Kahului Airport Access Road	840	847	902
R	ConRAC/Public/Employee Parking Entrance	413	417	444
S	Public Parking Exit	54	54	58
T	Outbound Keolani Place from Koeheke Street	173	175	186
U	Keolani Place to Outbound Airport Road Connector	173	175	186
W	ConRAC Lower Level Exit to Loop Road	388	391	417
1	Northbound Koeheke Street into Baseyard and Alahao Street	99	100	106
2	Southbound Koeheke Street from Baseyard and Alahao Street	173	175	186

NOTE

1/ Peak Hour = 11:45 AM - 12:45 PM

SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Layout Plan, April 2004; Ricondo & Associates, Inc., October 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

EXHIBIT 6

NORTH

0 800 ft.

ConRAC Site 5 Alternative - Roadway Network and Peak Hour Traffic Volumes

Roadway Demand Capacity Analysis Results

Roadway parameters, such as speed limit, number of lanes, and roadway classification were collected for each link to determine the link capacities. The capacity ranges for each link depend on various parameters according to the class of roadway. The terminal area roadways in this demand capacity analysis are classified based on speed-flow rate tables, as summarized in **Table 2**. The Airport roadways in this analysis range from Terminal Access Roadways at 30 miles per hour (which include Keolani Place, new Kahului Airport Access Road, and outbound side of the Airport terminal loop road). The curbside approach roads and ramps were analyzed with a posted speed limit of 15 miles per hour.

Table 2 Capacity and Level of Service Ranges for Terminal Area Roadways

TYPICAL ROADWAY CLASSIFICATION [2/]	MAXIMUM FREE FLOW SPEED (MPH) [2/]	MAXIMUM FLOW RATES (VEHICLES/HOUR/LANE) [1/]				
		A	B	C	D	E
Airport access highway	60	630	1,030	1,460	1,880	2,090
	55	520	850	1,220	1,580	1,800
Entry/exit roadway	50	450	730	1,050	1,390	1,620
	45	400	660	950	1,260	1,530
Terminal loop roadway	40	370	600	860	1,130	1,410
	35	340	540	790	1,030	1,290
Terminal access roadway	30	310	480	700	930	1,170
	25	250	400	600	800	1,010
Ramps (25 MPH or less)	15	250	400	600	800	1,010

NOTES:

1/ Flow rates were adjusted to account for heavy vehicles and the effects of unfamiliar drivers.

2/ The roadway classification and associated speeds represent a typical range that varies by airport.

SOURCES: Ricondo & Associates, Inc., based on information presented in (a) Exhibit 21-2, Transportation Research Board, National Research Council, Highway Capacity Manual, December 2000, and (b) Airport Cooperative Research Program, Revised Preliminary Draft, Guide for Analysis of Airport Curbside and Terminal-Area Roadway Operations, Airport Cooperative Research Program, June 4, 2009.

PREPARED BY: Ricondo & Associates, Inc., October 2012.

The results of the 2012 (Baseline), 2015 and 2020 roadway demand capacity analysis for the existing roadway configuration as well as each of the three traffic scenario discussed previously are presented below in the following tables: Existing Condition (**Table 3**), No Project Alternative (**Table 4**), ConRAC Site 4b Alternative (**Table 5**) and ConRAC Site 5 Alternative (**Table 6**). The volumes presented in the results tables represent the daily peak-hour from 11:45 a.m. and 12:45 p.m., and represent the expected peak

month busy day traffic condition for the Airport. The threshold of acceptable roadway LOS during peak periods at most airports is typically LOS D or better. All roadway links evaluated in this analysis from 2012 through 2020, in all traffic scenarios achieved a LOS of C or better.

Table 3 Existing Conditions Roadway Demand Capacity Analysis Results

				2012		2015		2020	
LINK ID	LINK NAME	MINIMUM NUMBER OF LANES	SPEED LIMIT	VOLUME [1/]	LOS	VOLUME [1/ 2/]	LOS	VOLUME [1/ 3/]	LOS
A	Airport Loop Before Public Parking	4	15	1,009	C	1,018	C	1,084	C
B	Entering Airport Curbside	3	15	936	B	944	B	1,006	C
C	Airport Loop before Employee Parking Entrances	3	15	936	B	944	B	1,006	C
D	Airport Loop after Employee Parking Exits	3	30	911	B	919	B	979	C
E	Airport Loop after Public Parking Exits	3	30	965	C	974	C	1,037	C
I	Recirculation to Loop Road	1	15	270	A	272	A	290	A
R	Public Parking Entrance	1	15	73	A	74	A	78	A
S	Public Parking Exit	2	15	54	A	54	A	58	A
T	Airport Loop After Koeheke Street	3	30	1,114	C	1,124	C	1,197	C
1	Koeheke Street northbound	1	15	416	A	419	A	446	A
2	Koeheke Street southbound	1	15	553	A	557	A	594	A
16	Inbound Keolani Place. after Kaonawai Place	2	30	739	B	746	B	794	B
17	Outbound Keolani Place. before Kaonawai Place	2	30	844	B	851	B	907	B
18	Inbound Keolani Place. before Kaonawai Place	2	30	742	B	748	B	797	B
19	Outbound Keolani Place. after Kaonawai Place	2	30	863	B	870	B	927	B
20	Kaonawai Place to Enterprise	1	15	107	A	108	A	115	A
21	Kaonawai Place from Enterprise	1	15	108	A	109	A	116	A

NOTES:

1/ Volume of Rental Car Shuttles and Other Shuttle/Buses taken at 1.5 passenger car equivalents

2/ 2015 volume growth is based on an average annual gorwth of 0.3 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2015.

3/ 2020 volume growth is based on an average annual growth of 0.9 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2020.

SOURCES: Ricondo & Associates, Inc. October 2012 Julian Ng Associates, July 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

Table 4 (1 of 2) No Project Condition Roadway Demand Capacity Analysis

				2012		2015		2020	
LINK ID	LINK NAME	MINIMUM NUMBER OF LANES	SPEED LIMIT	VOLUME[1/]	LOS	VOLUME[1/, 2/]	LOS	VOLUME [1/, 3/]	LOS
A	Inbound New Airport Rd. between Recirculation and Public Parking Exit	2	15	1,049	C	1,058	C	1,127	C
B	Entering Airport Curbside	2	15	976	C	985	C	1,049	C
C	Airport Loop before Employee Parking Entrances	3	15	976	C	985	C	1,049	C
D	Airport Loop after Employee Parking Exits	3	30	951	B	959	B	1,022	C
E	Airport Loop after Public Parking Exits before Old Kahului Airport Connector	3	30	1,005	C	1,014	C	1,080	C
F	Airport Loop before connection to Keolani Place	2	30	597	A	602	A	641	B
H	Airport Loop before Recirculation Road	2	30	1,177	C	1,187	C	1,264	C
I	Recirculation to Loop Road	1	15	337	A	340	A	362	A
J	Inbound New Kahului Airport Access Road	2	30	713	B	719	B	766	B
Q	Outbound New Kahului Airport Access Road	2	30	840	B	847	B	902	B
R	Public Parking Entrance	1	15	73	A	74	A	78	A
S	Public Parking Exit	2	15	54	A	54	A	58	A
T	Outbound Keolani Place from Koeheke Street	2	30	559	A	563	A	600	A
U	Keolani Place to Outbound Airport Road Connector	1	15	670	B	675	B	719	B
V	Outbound Airport Road to Keolani Place Connector	1	15	89	A	90	A	96	A

Table 4 (2 of 2) No Project Condition Roadway Demand Capacity Analysis

				2012		2015		2020	
LINK ID	LINK NAME	MINIMUM NUMBER OF LANES	SPEED LIMIT	VOLUME[1/]	LOS	VOLUME[1/, 2/]	LOS	VOLUME [1/ 3/]	LOS
1	Koeheke Street Northbound	1	15	410	A	413	A	440	A
2	Koeheke Street Southbound	1	15	559	A	563	A	600	A
16	Inbound Keolani Place	2	30	111	A	112	A	119	A
17	Outbound Keolani Place	2	30	89	A	90	A	96	A
20	Kaonawai Place to Enterprise	1	15	89	A	90	A	96	A
21	Kaonawai Place from Enterprise	1	15	111	A	112	A	119	A

NOTES:

1/ Volume of Rental Car Shuttles and Other Shuttle/Buses taken at 1.5 passenger car equivalents

2/ 2015 volume growth is based on an average annual gorwth of 0.3 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2015.

3/ 2020 volume growth is based on an average annual growth of 0.9 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2020.

SOURCES: Ricondo & Associates, Inc. October 2012 Julian Ng Associates, July 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

Table 5 (1 of2) ConRAC Site 4b Condition Roadway Demand Capacity Analysis

				2012		2015		2020	
LINK ID	LINK NAME	MINIMUM NUMBER OF LANES	SPEED LIMIT	VOLUME [1/]	LOS	VOLUME [1/ 2/]	LOS	TOTALS [1/ 3/]	LOS
A	Inbound New Airport Rd. between Recirculation and Public Parking Exit	2	15	702	B	708	B	754	B
B	Entering Airport Curbside	3	15	629	B	634	B	675	B
C	Airport Loop before Employee Parking Entrances	3	15	629	B	634	B	675	B
D	Airport Loop after Employee Parking Exits	3	30	604	A	609	A	648	B
E	Airport Loop after Public Parking Exits before Keolani Street Connector	3	30	658	B	663	B	706	B
F	Airport Loop before connection to Keolani Place	2	30	559	A	563	A	600	A
G	Airport Loop after connection to Keolani Place	2	30	702	B	708	B	754	B
H	Airport Loop before Recirculation Road	2	30	702	B	708	B	754	B
I	Recirculation to Loop Road	1	15	139	A	140	A	149	A
J	Inbound New Kahului Airport Access Road	2	30	805	B	812	B	865	B
L	Inbound New Kahului Airport Access Road after Haleakala Exit	2	30	533	A	538	A	573	A
P	Outbound New Kahului Airport Access Road after Recirculation Road	2	30	563	A	568	A	605	A
Q	Outbound New Kahului Airport Access Road	2	30	908	B	916	B	975	C
R	Public Parking Entrance	1	15	73	A	74	A	78	A
S	Public Parking Exit	2	15	54	A	54	A	58	A
T	Outbound Keolani Place from Koeheke Street	2	30	173	A	175	A	186	A
U	Keolani Place to Outbound Airport Road Connector	1	15	173	A	175	A	186	A
V	Outbound Airport Road to Keolani Place Connector	1	15	30	A	30	A	32	A
1	NB Koeheke Street into base yard and Alahao Street	1	15	99	A	100	A	106	A
2	SB Koeheke Street from base yard and Alahao Street	1	15	173	A	175	A	186	A

Table 5 (2 of2) ConRAC Site 4b Condition Roadway Demand Capacity Analysis

				2012		2015		2020	
LINK ID	LINK NAME	MINIMUM NUMBER OF LANES	SPEED LIMIT	VOLUME [1/]	LOS	VOLUME [1/ 2/]	LOS	TOTALS [1/ 3/]	LOS
3	Off-Ramp from Inbound to Haleakala Highway & ConRAC	1	15	272	A	274	A	292	A
4	On-Ramp from Haleakala Highway to Outbound Airport Road	1	15	345	A	348	A	371	A
5	Inbound roadway to CONRAC	1	15	302	A	305	A	324	A
6	Outbound roadway from ConRAC	1	15	375	A	378	A	403	A
7	Off-Ramp from Inbound to Haleakala Hwy & from ConRAC Outbound	1	15	375	A	378	A	403	A
8	Road from Haleakala Highway to CONRAC	1	15	30	A	30	A	32	A
9	WB Haleakala Highway under Inbound Airport Roadway	1	30	30	A	30	A	32	A
10	EB Haleakala Highway under Inbound Airport Roadway	1	30	345	A	348	A	371	A
11	On-Ramp from Haleakala Highway back to Inbound Airport Road	1	15	30	A	30	A	32	A
12	EB Haleakala Highway west of Inbound Airport Roadway	1	30	30	A	30	A	32	A
13	WB Haleakala Highway west of Inbound Airport Roadway	1	30	0	A	0	A	0	A
14	SB Connector between Kahului Airport Road and Haleakala Highway	1	30	30	A	30	A	32	A
15	NB Connector between Kahului Airport Road and Haleakala Highway	1	30	0	A	0	A	0	A
16	Inbound Keolani Place east of Aalele Street Connector	2	30	0	A	0	A	0	A
17	Outbound Keolani Place east of Aalele Street Connector	2	30	30	A	30	A	32	A

NOTES:

1/ Volume of Rental Car Shuttles and Other Shuttle/Buses taken at 1.5 passenger car equivalents

2/ 2015 volume growth is based on an average annual gorwth of 0.3 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2015.

3/ 2020 volume growth is based on an average annual growth of 0.9 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2020.

SOURCES: Ricondo & Associates, Inc. October 2012 Julian Ng Associates, July 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

Table 6 ConRAC Site 5 Condition Roadway Demand Capacity Analysis

				2012		2015		2020	
LINK ID	LINK NAME	MINIMUM NUMBER OF LANES	SPEED LIMIT	VOLUME 1/	LOS	VOLUME 1/ 2/	LOS	TOTALS 1/ 3/	LOS
A	Inbound New Airport Rd. between Recirculation and Public Parking Exit	2	15	957	B	965	C	1,028	CB
B	Entering Airport Curbside	3	15	544	A	548	A	584	A
C	Airport Loop before Existing Employee Parking Entrances	3	15	544	A	548	A	584	A
D	Airport Loop after Existing Employee Parking Exits	3	30	544	A	548	A	584	A
E	Airport Loop after Public Parking Exits before Old Kahului Airport Connector	3	30	598	A	603	A	642	B
F	Airport Loop before connection to Keolani Place	2	30	499	A	503	A	536	A
G	Airport Loop after connection to Keolani Place	2	30	672	B	677	B	721	B
H	Airport Loop before Recirculation Road	2	30	1,060	C	1,069	C	1,138	C
I	Recirculation to Loop Road	1	15	220	A	221	A	236	A
J	Inbound New Kahului Airport Access Road	2	30	737	B	744	B	792	B
Q	Outbound New Kahului Airport Access Road	2	30	840	B	847	B	902	B
R	ConRAC/Public/Employee Parking Entrance	1	15	413	A	417	A	444	A
S	Public Parking Exit	2	15	54	A	54	A	58	A
T	Outbound Keolani Place from Koeheke Street	2	30	173	A	175	A	186	A
U	Keolani Place to Outbound Airport Road Connector	1	15	173	A	175	A	186	A
W	ConRAC Lower Level Exit to Loop Road	1	15	388	A	391	A	417	A
1	NB Koeheke Street into base yard and Alahao Street	1	15	99	A	100	A	106	A
2	SB Koeheke Street into base yard and Alahao Street	1	15	173	A	175	A	186	A

NOTES:
1/ Volume of Rental Car Shuttles and Other Shuttle/Buses taken at 1.5 passenger car equivalents
2/ 2015 volume growth is based on an average annual gorwth of 0.3 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2015.
3/ 2020 volume growth is based on an average annual growth of 0.9 percent, consistent with the OGG Master Plan Growth in passenger traffic from 2012 through 2020.

SOURCES: Ricondo & Associates, Inc. October 2012 Julian Ng Associates, July 2012.

PREPARED BY: Ricondo & Associates, Inc., October 2012.

Weave Analysis Results

In addition to the roadway link analysis, a weave analysis was conducted to evaluate key study area roadway weaving segments as illustrated on **Exhibit 7**. These weave segments represent the critical areas where vehicular weaving actions are performed on airport property, and are the focus of the weaving analysis.

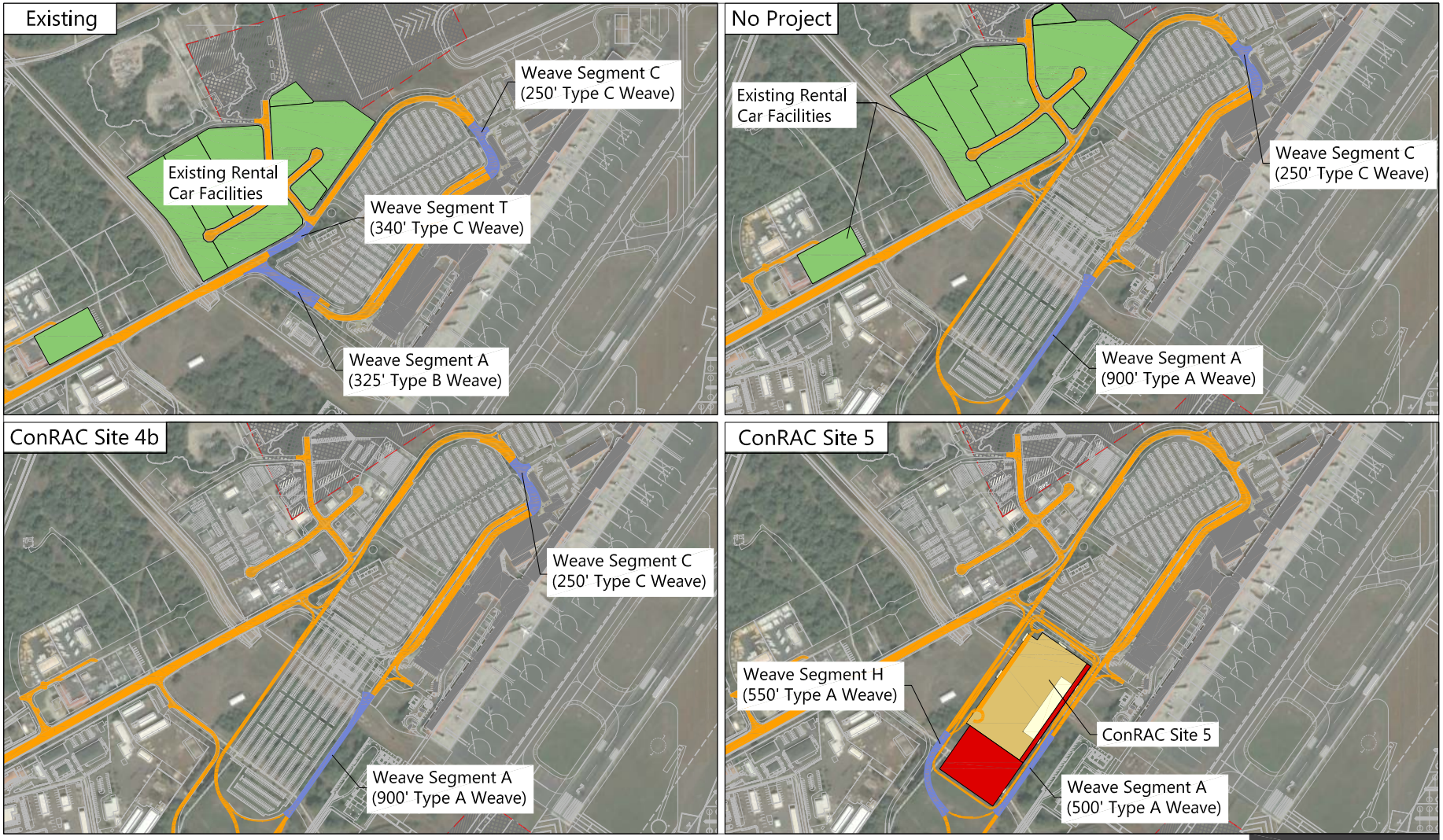
Roadway capacity analysis provides a quantitative measure for identifying the point at which traffic demand exceeds the capacity of the roadway to accommodate that demand. However, lane capacity analysis does not directly address the effect on roadway capacity resulting from the interaction of vehicles in weaving sections. The Highway Capacity Manual[2] defines weaving as "the crossing of two or more traffic streams traveling in the same general direction along a significant length of highway, without the aid of traffic control devices." The length of the weaving section defines the time and space in which a driver must make required lane changes. As the length of weaving section decreases (all other factors remaining constant), the intensity of lane changing and resulting level of traffic flow turbulence increases. Weaving LOS is a function of density in passenger cars per mile per lane based on the criteria detailed in **Table 7**.

Table 7 Level of Service Criteria for Weaving Segments

MULTILANE AND COLLECTOR-DISTRIBUTOR WEAVING SEGMENTS		
LOS	**DENSITY (PASSENGER CARS/MILE/LANE)**	**CONDITIONS**
A	Less than or equal to 12.0	Excellent
B	12.0 - 24.0	Very Good
C	24.0 - 32.0	Good
D	32.0 - 36.0	Fair
E	36.0 - 40.0	Poor
F	Greater than 40.0	FAILURE

SOURCE: Transportation Research Board, National Research Council, Highway Capacity Manual 2000.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

[2] Highway Capacity Manual, Transportation Research Board, 2000, Washington D.C., 2000.



SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kahului Airport Layout Plan, April 2004; Ricondo & Associates, Inc., October 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

EXHIBIT 7

NORTH 0 1000 ft.

Key Study Area Roadway Weaving Segments

Weaving Methodology

Using the peak link volumes from the data collected for 2012, and projected for 2015 and 2020, weaving analyses were conducted for the three weaving segments on the existing condition road network, two locations on the No Project road network, two locations on the ConRAC Site 4b road network, and two locations on the ConRAC Site 5 road network.

The weaving segments were analyzed using the Highway Capacity Manual weaving methodology for multilane and collector-distributor weaving segments, as the freeway methodology is more applicable to higher freeway speeds. Weaving segment configurations are classified by the Highway Capacity Manual as either: Type A, Type B, or Type C based on the number of lane changes required of each weaving movement. **Table 8** was used to establish the configuration type of each weaving segment.

Table 8 Weave Configuration Types

NUMBER OF LANE CHANGES REQUIRED BY MOVEMENT V_{W1}	NUMBER OF LANE CHANGES BY MOVEMENT V_{W2}		
	0	1	≥2
0	Type B	Type B	Type C
1	Type B	Type A	N/A
≥2	Type C	N/A	N/A

SOURCE: Transportation Research Board, National Research Council, Exhibit 24-5, Highway Capacity Manual 2000.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

Based on the geometry of the Airport roadways, the following is a brief description of the six weaving segments and the key parameters used in the weave-type assessment:

1. *Existing Roadway Condition: Inbound Loop Roadway between Recirculation Road and the entrance lane to Public Parking* – This is classified as a Type B weave, and is approximately 325 feet in length. Traffic entering the weave from the inbound Kahului Airport Roadway must weave across one lane to access the public parking entrance, while recirculating traffic entering the weave can either access the parking entrance or continue in their lane to the terminal loop road leading to the terminal curbside. This section of roadway is four lanes wide with a posted speed limit of 15 mph.

2. *Existing Roadway Condition: Loop Roadway between Inner/Outer Curbside and Commuter Terminal Road* – This is classified as a Type C weave, and is approximately 250 feet in length. Rental Car Shuttles entering the weave from the outer curbside lanes must weave across a minimum of three

lanes to access the Commuter Terminal Road while inner curbside lanes can access either the outbound loop road or the Commuter Terminal Road without making a lane change. Since specific inner and outer curbside traffic volumes were not collected, an assumption of 70% of the curbside traffic is on the inner curbside, and 100% of the Rental Car Shuttles are coming from the outer curbside. This assumption makes the weave condition very aggressive, but the results of the analysis very conservative. This section of roadway is three lanes wide, with a posted speed limit of 15 mph.

3. *Existing Roadway Condition: Outbound Loop Roadway between* Koeheke Street *and the Recirculation Road* – This is classified as a Type C weave, and is approximately 340 feet in length. Traffic entering the weave from the Koeheke Street (i.e. mostly rental car shuttles) must weave across a minimum of two lanes to access the recirculation roadway leading to the airport loop road while outbound traffic on the loop roadway entering the weave can access either the recirculation road or outbound Keolani Place without making a lane change. This section of roadway is three lanes wide, with a posted speed limit of 30 mph.

4. *No Project Condition: Inbound Loop Roadway between Recirculation Road and the entrance lane to Public Parking* – This is classified as a Type A weave and is approximately 900 feet in length. Traffic entering the weave from the new inbound Kahului Airport Access Road must weave across one lane to access the public parking entrance, while recirculating traffic entering the weave can remain in their lane to access the entrance to public parking or making a single lane change access the inbound loop roadway and terminal curbside. Based on concept plans showing this section of roadway as being two lanes wide, for the purpose of this analysis, it was assumed this roadway would have a posted speed limit of 30 mph.

5. *No Project: Loop Roadway between Inner/Outer Curbside and Commuter Terminal Road* – This is classified as a Type C weave, and is approximately 250 feet in length. Rental Car Shuttles entering the weave from the outer curbside lanes must weave across a minimum of three lanes to access the Commuter Terminal Road while inner curbside lanes can access either the outbound loop road or the Commuter Terminal Road without making a lane change. Since specific inner and outer curbside traffic volumes were not collected, an assumption of 70% of the curbside traffic is on the inner curbside, and 100% of the Rental Car Shuttles are coming from the outer curbside. This assumption makes the weave condition very aggressive, but the results of the analysis very conservative. This section of roadway is three lanes wide, with a posted speed limit of 15 mph.

6. ConRAC Site 4b *Condition: Inbound Loop Roadway between Recirculation Road and the entrance lane to Public Parking* – This is classified as a Type A weave and is approximately 900 feet in

length. Traffic entering the weave from the new inbound Kahului Airport Access Road must weave across one lane to access the public parking entrance, while recirculating traffic entering the weave can remain in their lane to access the entrance to public parking or making a single lane change access the inbound loop roadway and terminal curbside. Based on concept plans showing this section of roadway as being two lanes wide, for the purpose of this analysis, it was assumed this roadway would have a posted speed limit of 30 mph

7. *ConRAC Site 4b Condition: Loop Roadway between Inner/Outer Curbside and Commuter Terminal Road* – This is classified as a Type C weave, and is approximately 250 feet in length. Rental Car Shuttles entering the weave from the outer curbside lanes must weave across a minimum of three lanes to access the Commuter Terminal Road while inner curbside lanes can access either the outbound loop road or the Commuter Terminal Road without making a lane change. Since specific inner and outer curbside traffic volumes were not collected, an assumption of 70% of the curbside traffic is on the inner curbside, and 100% of the Rental Car Shuttles are coming from the outer curbside. This assumption makes the weave condition very aggressive, but the results of the analysis very conservative. This section of roadway is three lanes wide, with a posted speed limit of 15 mph.

8. ConRAC Site 5 *Condition: Inbound Loop Roadway between Recirculation Road and the entrance lane to ConRAC/Employee Parking/Public Parking* – This is classified as a Type A weave and is approximately 500 feet in length. Traffic entering the weave from the new inbound Kahului Airport Access Road must weave across one lane to access the ConRAC/parking entrance and recirculation traffic entering the weave can access the inbound loop roadway to the terminal by making a single lane change. Based on concept plans showing this section of roadway as being two lanes wide, for the purpose of this analysis, it was assumed this roadway would have a posted speed limit of 30 mph.

9. ConRAC Site 5 *Condition: Outbound Loop Roadway between ConRAC Exit roadway and the recirculation ramp back towards the terminal* – This is classified as a Type A weave, and is approximately 550 feet in length. Traffic exiting the ConRAC and entering the weave must cross one lane to access the Airport's outbound roadway, while traffic entering the weave from the airport loop roadway can access the recirculation road by making a single lane change to the left. Based on concept plans showing this section of roadway as being two lanes wide, for the purpose of this analysis, it was assumed this roadway would have a posted speed limit of 30 mph.

Weaving Demand/Capacity Analysis Results

The results of the weaving analysis provided in **Table 9** indicate an adequate (LOS D or better) weaving capacity was achieved in all weaving segments through 2020. Table 9 shows that all the weaving segments analyzed operated at LOS B or better in the traffic scenarios analyzed for each of the planning horizons through 2020.

Table 9 Weaving Segments Analysis Results

								2012			2015			2020		
WEAVE LINK	PRIMARY ROADWAY	UPSTREAM RAMP	DOWNSTREAM RAMP	WEAVE TYPE	# OF LANES	WEAVE LENGTH	SPEED (MPH)	TOTAL VOLUME	WEAVING DENSITY (PC/MI/LN)	WEAVING LOS	TOTAL VOLUME	WEAVING DENSITY (PC/MI/LN)	WEAVING LOS	TOTAL VOLUME	WEAVING DENSITY (PC/MI/LN)	WEAVING LOS
Existing Conditions																
A	Inbound Airport Loop Road	Recirculation Road	Public Parking Entrance	B	4	325	15	1,009	8.19	A	1,018	8.26	A	1,084	8.84	A
C	Airport Loop Road	Inner/Outer Curbside	Commuter Terminal Road	C	3	250	15	936	13.48	B	944	13.63	B	1,006	14.7	B
T	Outbound Airport Loop Road	Koeheke Street	Recirculation Road	C	3	340	30	1,115	14.68	B	1,125	14.84	B	1,198	16.03	B
No Project																
A	Inbound Airport Loop Road	Recirculation Road	Public Parking Entrance	A	2	900	30	1,010	17.35	B	1,019	17.52	B	1,085	18.84	B
C	Airport Loop Road	Inner/Outer Curbside	Commuter Terminal Road	C	3	250	15	976	14.14	B	985	14.3	B	1,049	15.43	B
Site 4b																
A	Inbound Airport Loop Road	Recirculation Road	Public Parking Entrance	A	2	900	30	702	10.92	A	708	11.01	A	754	11.8	A
C	Airport Loop Road	Inner/Outer Curbside	Commuter Terminal Road	C	3	250	15	629	8.09	A	634	8.18	A	675	8.81	A
Site 5																
A	Inbound Airport Loop Road	Recirculation Road	ConRAC/Parking Entrance	A	2	500	30	957	18.24	B	965	18.45	B	1028	19.92	B
H	Outbound Airport Loop Road	ConRAC/Parking Exit	Recirculation Road	A	2	550	30	1,060	21.74	B	1,069	21.98	B	1,139	23.79	B

SOURCES: Ricondo & Associates, Inc. October 2012 Julian Ng Associates, July 2012.
PREPARED BY: Ricondo & Associates, Inc., October 2012.

Impact Analyses

This section presents the results of the potential impacts analyses to the study area roadways and weaving segments due to the changes in traffic demand and flow generated by the project as compared to the no project condition. The analysis compares the project level of service to the no project level of service for both the study roadways and weaving sections under cumulative conditions to determine if the proposed project generates potential impacts.

Project Specific Impact Criteria

The Level of Service for the Study roadways and weave segments has been analyzed and evaluated based on the LOS range from LOS A (excellent) to LOS F (failure) conditions, with a LOS D considered to be the minimum desirable LOS for this analysis.

If an average LOS E or LOS F for the peak hour is projected under the Project conditions, where under the No Project condition an average LOS D or better for the peak hour was projected, the project would be considered to cause a project specific impact. A project specific impact would require improvements be proposed to mitigate the expected impacts.

Impact Analysis Results

Since all study roadways and weaves operated at LOS C or better for both the No Project and proposed Project (ConRAC Site 4b and Site 5 Alternatives), there are no impacts attributed to project related traffic throughout the 2015 and 2020 planning horizon.

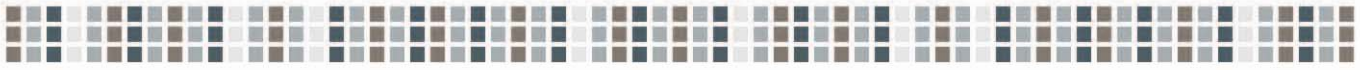
Conclusion

Based on the impact criteria defined above, the Project condition resulted in no project specific impacts to the study area roadways and weaving segments. Roadway link traffic along the terminal loop roadway decrease in both the ConRAC Site 4b and ConRAC Site 5 Alternatives as most rental car traffic no longer would need to pass by the terminal curbfront to access most rental car company sites which are located on Koeheke Street. In addition, ConRAC Site 5 has less traffic than ConRAC Site 4b as there are no ConRAC shuttles circulating the Airport terminal loop roadway. Plus, in ConRAC Site 5, all employee parking has also been removed from the terminal area roadways.

cc: Ura Quoniou
09-01-0634-05
Read File

Appendix F

Cultural Impact Assessment



SCS Project Number 1292-CIA-1

A CULTURAL IMPACT ASSESSMENT FOR THE CONSOLIDATED RENTAL CAR FACILITY AND ASSOCIATED IMPROVEMENTS AT KAHULUI AIRPORT, KAHULUI, WAILUKU AHUPUA`A WAILUKU DISTRICT, ISLAND OF MAUI, HAWAI`I [TMK: (2) 3-8-001:019, 123, 239 and 3-8-079:021]

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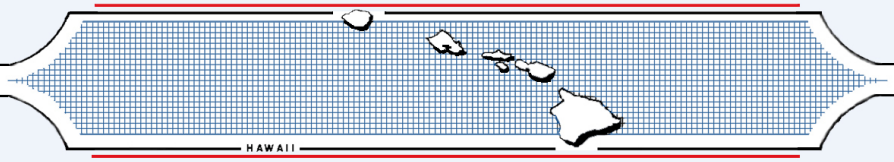

711 Kapiolani Blvd. Suite 975 Honolulu, Hawai`i 96813

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INTRODUCTION

At the request of Ricondo and Associates, Inc., (representing the State of Hawaii Department of Transportation-Airports, DOT-A; landowner), Scientific Consultant Services, Inc. (SCS), prepared this Cultural Impact Assessment (CIA) for the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001: 019, 123, 239 and 3-8-079:021] (Figures 1 through 3).

The Constitution of the State of Hawai`i clearly states the duty of the State and its agencies is to preserve, protect, and prevent interference with the traditional and customary rights of Native Hawaiians. Article XII, Section 7 (2000) requires the State to "protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by *ahupua`a* tenants who are descendants of Native Hawaiians who inhabited the Hawaiian Islands prior to 1778." In spite of the establishment of the foreign concept of private ownership and western-style government, Kamehameha III (Kauikeaouli) preserved the peoples traditional right to subsistence. As a result in 1850, the Hawaiian Government confirmed the traditional access rights to Native Hawaiian *ahupua`*a tenants to gather specific natural resources for customary uses from undeveloped private property and waterways under the Hawaiian Revised Statutes (HRS) 7-1. In 1992, the State of Hawai`i Supreme Court, reaffirmed HRS 7-1 and expanded it to include, "native Hawaiian rights…may extend beyond the *ahupua`a* in which a Native Hawaiian resides where such rights have been customarily and traditionally exercised in this manner" (Pele Defense Fund v. Paty, 73 Haw.578, 1992).

Act 50, enacted by the Legislature of the State of Hawai`i (2000) with House Bill (HB) 2895, relating to Environmental Impact Statements, proposes that:

> …there is a need to clarify that the preparation of environmental assessments or environmental impact statements should identify and address effects on Hawaii's culture, and traditional and customary rights… [H.B. NO. 2895].

Articles IX and XII of the state constitution, other state laws, and the courts of the State impose on government agencies a duty to promote and protect cultural beliefs and practices, and resources of Native Hawaiians as well as other ethnic groups. Act 50 also requires state agencies and other developers to assess the effects of proposed land use or shore line developments on the

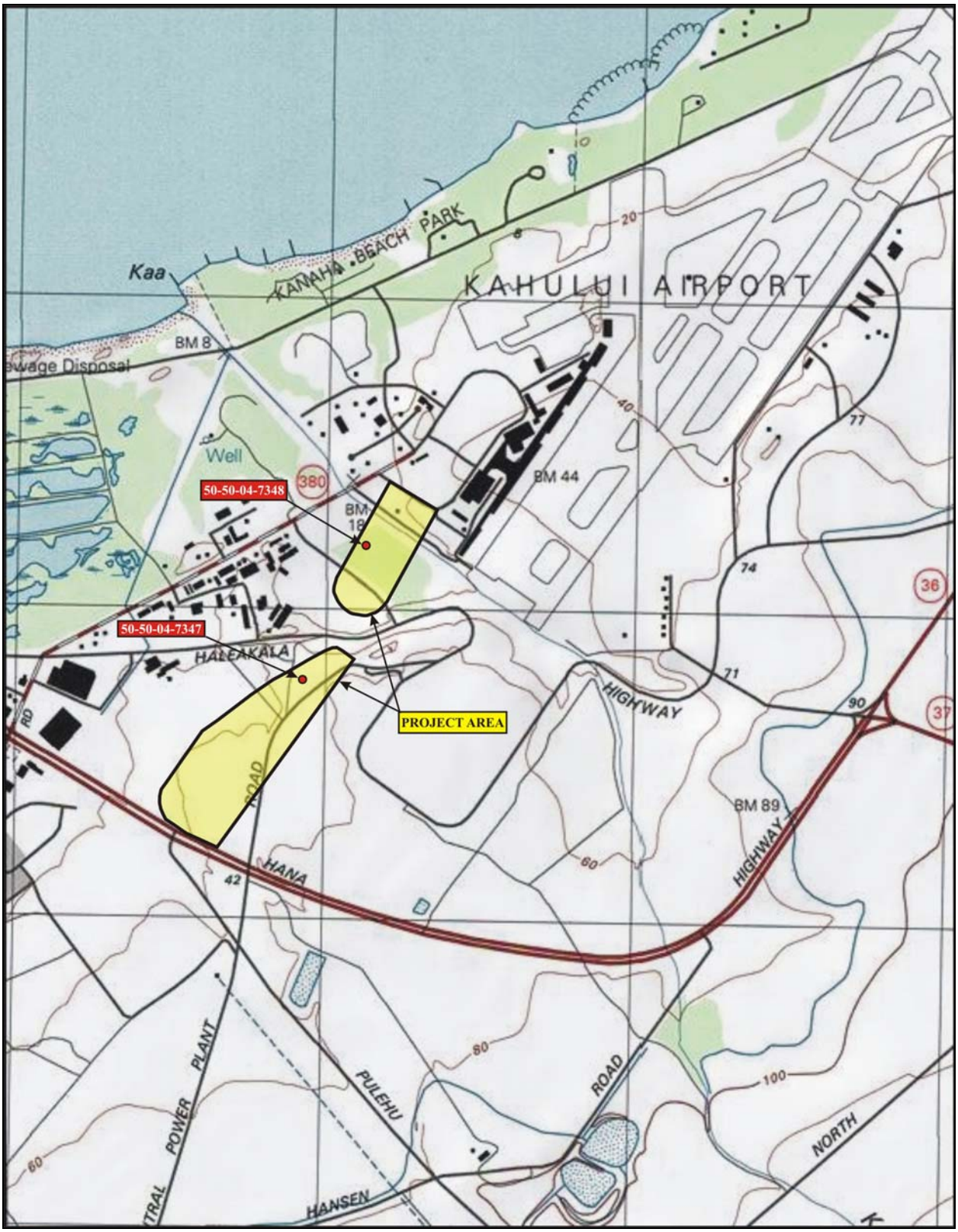

Figure 1: USGS Quadrangle (Wailuku) Map (Showing Project Area and Archaeological Sites.

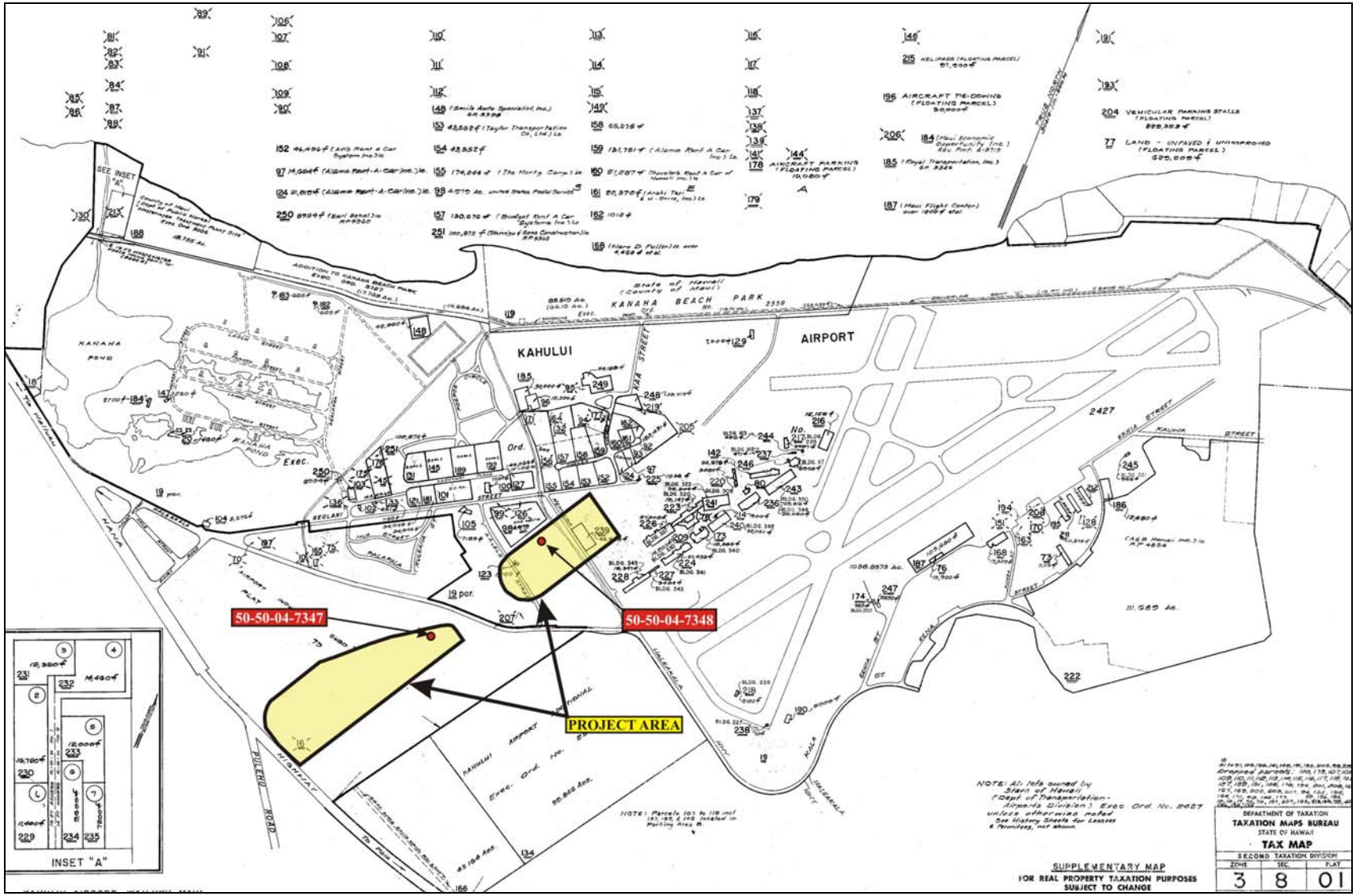

Figure 2: Tax Map Key [TMK: (2) 3-8-001] Showing Project Areas and Archaeological Sites.

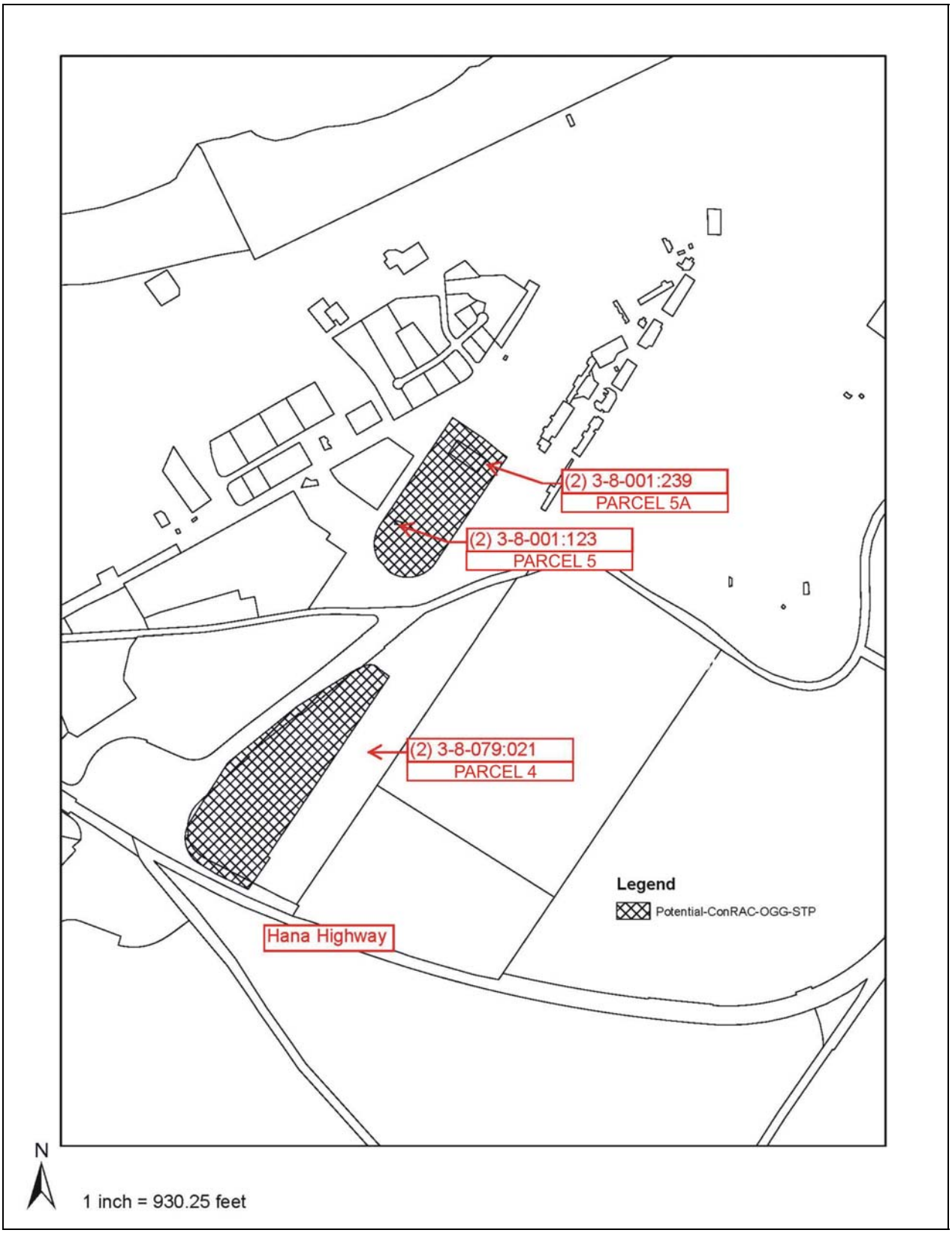

Figure 3: Map Depicting Parcels Composing Project Area and their Tax Map Key Designations.

"cultural practices of the community and State" as part of the HRS Chapter 343 (2001) environmental review process.

Act 50 re-defined the definition of "significant effect" to include "the sum of effects on the quality of the environment including actions impact a natural resource, limit the range of beneficial uses of the environment, that are contrary to the State's environmental policies . . . or adversely affect the economic welfare, social welfare or cultural practices of the community and State" (H.B. 2895, Act 50, 2000). Cultural resources can include a broad range of often overlapping categories, including places, behaviors, values, beliefs, objects, records, stories, etc. (H.B. 2895, Act 50, 2000).

Thus, Act 50 requires that an assessment of cultural practices and the possible impacts of a proposed action be included in Environmental Assessments and Environmental Impact Statements, and to be taken into consideration during the planning process. As defined by the Hawaii State Office of Environmental Quality Control (OEQC), the concept of geographical expansion is recognized by using, as an example, "the broad geographical area, e.g. district or *ahupua`a*" (§11-200-A HAR). It was decided that the process should identify 'anthropological' cultural practices, rather than 'social' cultural practices. For example, *limu* (edible seaweed) gathering would be considered an anthropological cultural practice, while a modern-day marathon would be considered a social cultural practice.

Therefore, the purpose of a Cultural Impact Assessment is to identify the possibility of on-going cultural activities and resources within a project area, or its vicinity, and then assess the potential for impacts on these cultural resources. The CIA is not intended to be a document of in depth archival-historical land research, or a record of oral family histories, unless these records contain information about specific cultural resources or practices that might be impacted by a proposed project.

According to the Guidelines for Assessing Cultural Impacts established by the Hawaii State Office of Environmental Quality Control (§11-200-A HAR):

> The types of cultural practices and beliefs subject to assessment may include subsistence, commercial, residential, agricultural, access-related, recreational, and religions and spiritual customs. The types of cultural resources subject to assessment may include traditional cultural properties or other types of historic sites, both manmade and natural, which support such cultural beliefs.

The meaning of "traditional" was explained in *National Register Bulletin*:

> Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations', usually orally or through practice. The traditional cultural significance of a historic property then is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. . . . [Parker and King 1990:1]

METHODOLOGY

This Cultural Impact Assessment was prepared, as much as possible, in accordance with the suggested methodology and content protocol in the Guidelines for Assessing Cultural Impacts (§11-200-A HAR). In outlining the "Cultural Impact Assessment Methodology", the OEQC states that:

> "…information may be obtained through scoping, community meetings, ethnographic interviews and oral histories…"

This report contains archival and documentary research, as well as communication with organizations having knowledge of the project area, its cultural resources, and its practices and beliefs. An example of the letters of inquiry are presented below in Appendix A; copies of posted legal notices are presented in Appendix B; an example of the follow-up letters of inquiry are presented below in Appendix C. This Cultural Impact Assessment was prepared in accordance with the suggested methodology and content protocol provided in the Guidelines for Assessing Cultural Impacts (§11-200-A HAR), whenever possible. The assessment concerning cultural impacts may include, but not be limited to, the following matters:

(1) if consultation is available, a discussion of the methods applied and results of consultation with individuals and organizations identified by the preparer as being familiar with cultural practices and features associated with the project area, including any constraints of limitations which might have affected the quality of the information obtained;

(2) a description of methods adopted by the preparer to identify, locate, and select the persons interviewed, including a discussion of the level of effort undertaken;

(3) if conducted, interview procedures, including the circumstances under which the interviews were conducted, and any constraints or limitations which might have affected the quality of the information obtained;

(4) biographical information concerning the individuals and organizations consulted, their particular expertise, and their historical and genealogical relationship to the project area, as well as information concerning the persons submitting information or being interviewed, their particular knowledge and cultural expertise, if any, and their historical and genealogical relationship to the project area;

(5) a discussion concerning historical and cultural source materials consulted, the institutions and repositories searched, and the level of effort undertaken, as well as the particular perspective of the authors, if appropriate, any opposing views, and any other relevant constraints, limitations or biases;

(6) a discussion concerning the cultural resources, practices and beliefs identified, and for the resources and practices, their location within the broad geographical area in which the proposed action is located, as well as their direct or indirect significance or connection to the project site;

(7) a discussion concerning the nature of the cultural practices and beliefs, and the significance of the cultural resources within the project area, affected directly or indirectly by the proposed project;

(8) an explanation of confidential information that has been withheld from public disclosure in the assessment;

(9) a discussion concerning any conflicting information in regard to identified cultural resources, practices and beliefs;

(10) an analysis of the potential effect of any proposed physical alteration on cultural resources, practices, or beliefs; the potential of the proposed action to isolate cultural resources, practices, or beliefs from their setting; and the potential of the proposed action to introduce elements which may alter the setting in which cultural practices take place, and;

(11) the inclusion of bibliography of references, and attached records of interviews which were allowed to be disclosed.

If on-going cultural activities and/or resources are identified within the project area, assessments of the potential effects on the cultural resources in the project area and recommendations for mitigation of these effects can be proposed.

ARCHIVAL RESEARCH

Archival research focused on a historical documentary study involving both published and unpublished sources. These included legendary accounts of native and early foreign writers; early historical journals and narratives; historic maps, land records, such as Land Commission

Awards, Royal Patent Grants, and Boundary Commission records; historic accounts, and previous archaeological reports.

INTERVIEW METHODOLOGY

Interviews are conducted in accordance with Federal and State laws, and guidelines, when knowledgeable individuals are able to identify cultural practices or resources in, or in close proximity to, the project area. If they have knowledge of traditional stories, practices and beliefs associated with a project area or if they know of historical properties within the project area, they are sought out for additional consultation and interviews. Individuals who have particular knowledge of traditions passed down from preceding generations and a personal familiarity with the project area are invited to share their relevant information concerning particular cultural resources. Often people are recommended for their expertise, and indeed, organizations, such as Hawaiian Civic Clubs, the Island Branch of Office of Hawaiian Affairs (OHA), historical societies, Island Trail clubs, and Planning Commissions are depended upon for their recommendations of suitable informants. These groups are invited to contribute their input, and suggest further avenues of inquiry, as well as specific individuals to interview. It should be stressed again that this process does not include formal or in-depth ethnographic interviews or oral histories as described in the OEQC's *Guidelines for Assessing Cultural Impacts* (1997). The assessments are intended to identify potential impacts to on-going cultural practices, or resources, within a project area or in its close vicinity.

If knowledgeable individuals are identified, personal interviews are sometimes taped and then transcribed. These draft transcripts are returned to each of the participants for their review and comments. After corrections are made, each individual signs a release form, making the interview available for this study. When telephone interviews occur, a summary of the information is usually sent for correction and approval, or dictated by the informant and then incorporated into the document. If no cultural resource information is forthcoming and no knowledgeable informants are suggested for further inquiry, interviews are not conducted.

PROJECT AREA AND VICINITY

The project area is comprised of three parcels encompassing 40-acres of undeveloped land adjacent to the Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Island of Maui, Hawai`i (see Figures 1 and 2). Kahului is situated on the northern side of the low sandy isthmus between East and West Maui. The three parcels have variable acreage and different Tax Map Key (TMK) designations (see Figure 3). Parcel 4 [TMK: (2) 3-8-079:021] consists of 23

acres of cleared land which was formerly under commercial sugarcane production (Figures 4 and 5); Parcel 5 [TMK: (2) 3-8-001:123] consists of 15.7 acres of land currently used as a baseyard and construction materials storage area. Large piles of excavated soil from other locations, as well as asphalt, are mounded in some cases over 25 ft. in places (Figures 6 and 7). Parcel 5A [TMK: (2) 3-8-001:239], located within Parcel 5, consists of approximately 1 acre built environment (Figure 8). Parcel 4 runs from near the southwestern flank of the runway area to Dairy Road while Parcel 5 and Parcel 5A are situated west of the airport buildings, toward Haleakala Highway.

In addition to these three main parcels, two other areas were surveyed for a proposed detention basin. Area 1, occurring just to the west of Parcel 5 (Figure 9), measures 0.96-acres and is very similar to Parcel 5 in that the entire area has been graded and piled with construction soils (fill), rocks, and removed asphalt. Dirt roads also run through Area 1. The second potential location for the detention basin was designated as Area 5, and occurs to the northwest of Parcel 5, with the airport road to terminal running by its western flank. Area 5 encompasses only 0.32-acres and is currently landscaped in common lawn grass, with several coconut trees. This small parcel also borders the western flank of the airport parking lot.

ENVIRONMENTAL SETTING

The terrain within the project area is relatively flat in most of the project area, some exceptions being around and within the border areas of Parcel 5 [TMK: (2) 3-8-001:123] which have been artificially filled, creating slopes and mounded areas. Parcel 4 [TMK: (2) 3-8-079:021] is totally undeveloped, with portions of Parcel 5 [TMK: (2) 3-8-001:123] and Parcel 5A [TMK: (2) 3-8-001:239] containing currently operating businesses (see Figure 8); Parcel 5A currently houses a United Parcel Service office. The parcels all exhibit much evidence for previous intensive mechanical ground disturbance from grading, grubbing, blading, and filling events. Parcel 4 occurs at an elevation between 60 and 80 feet above mean sea level (amsl.) while Parcel 5 and Parcel 5A occur at an average elevation of 40 ft. amsl. There is one drainage in the project area, Kalialimui Stream. The stream runs north-south under a developed portion of Parcel 5. The stream is intermittent and previously would drain into the marshlands near the coast. More recently (1990), the stream became a channel and now drains into the ocean.

RAINFALL

The Kahului area is fairly dry owing in part to the ‘rain shadow’ effect of Haleakala. According to Armstrong (1983), annual rainfall in the project area is between the 500 mm (20

Figure 4: Photographic Overview of Parcel 4 [TMK: (2) 3-8-079:021]. View to South. Note: Mill in Background.

Figure 5: Photographic Overview of Parcel 4 [TMK: (2) 3-8-079:021] with Backhoe. View to Southwest.

Figure 6: Photographic Overview of Parcel 5 [TMK: (2) 3-8-001:123], Central Section. View to Northwest.

Figure 7: Photographic Overview of Parcel 5 [TMK: (2) 3-8-001:123] , Central Section Looking Towards Airport. View to Southeast. Note: Large Mounds of Imported Soil and Fill.

Figure 8: Photographic Overview of Parcel 5A [TMK: (2) 3-8-001:239], Built Environment. View to Northeast.

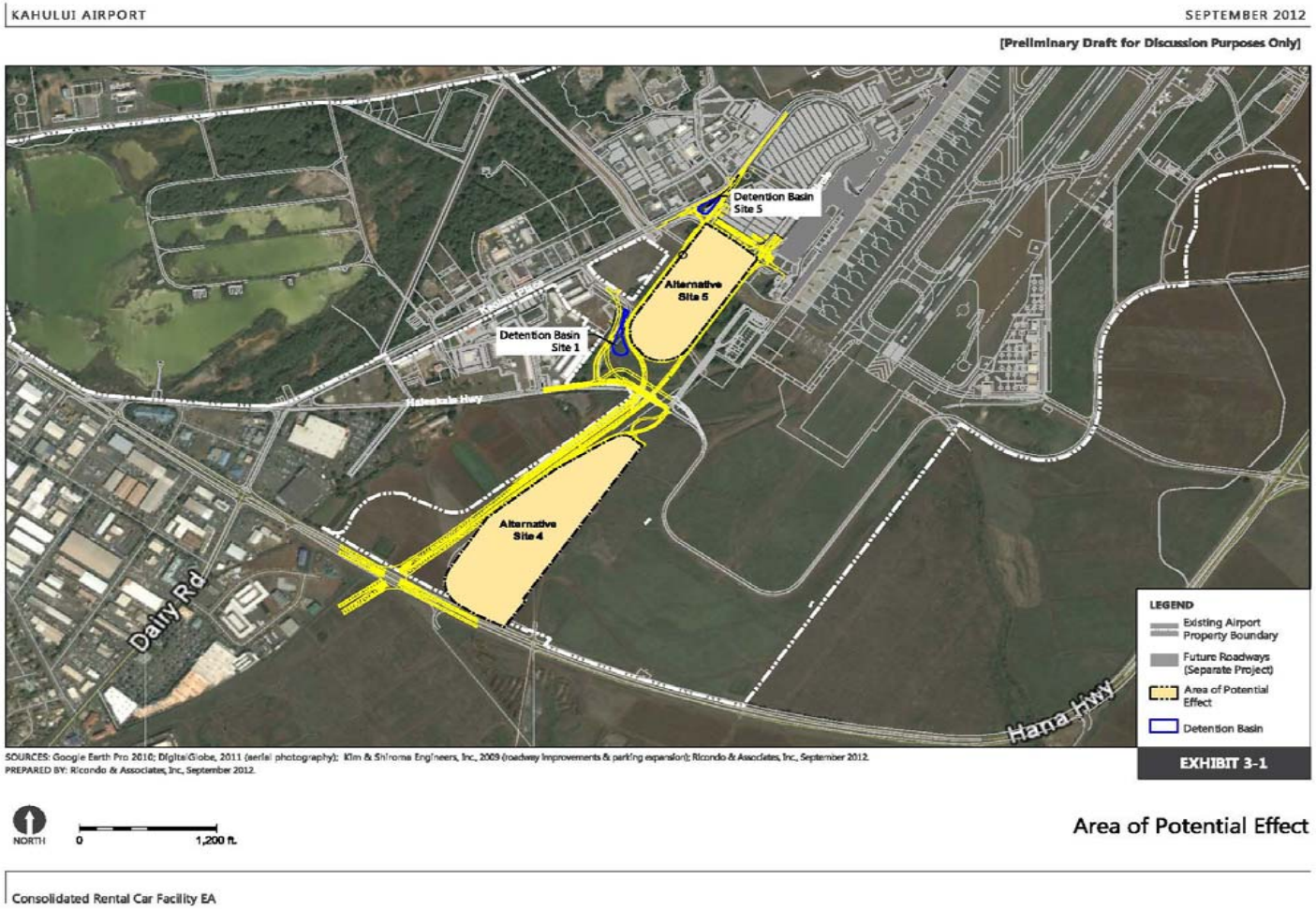

Figure 9: Google Earth Image (2011) Showing Location of Detention Basins 1 and 5.

in.) and 760 mm (30 in.) isohyets. Giambelluca *et al.* (1986) indicate the project area sits more or less on the 500 mm (20 in.) isohyet.

SOILS

Project area soils are exclusively classified as "Molokai silty clay loam" (Foote *et al*. 1972:96; Map Sheet 104). These well-drained soils typically occur on 0-3% slopes and are derived *in situ* from weathered igneous rock. Soil permeability is classified as "moderate, runoff is slow, and the erosion hazard is slight" (Foote *et al.* 1972:96). The surface of the soil, to 57 inches below surface, consists of dark reddish brown silty clay loam. This was verified during trenching for the current project. Historically, this soil series was utilized entirely for sugar cane production. Dune Land (DL) is present outside, to the north, of the current project area.

VEGETATION

Vegetation in the project area is very sparse and primarily consists of bufflegrass (*Cenchrus ciliaris* L.). Some *koa haole* (*Leucaenal leucocephala*), and the occasional *kiawe* tree (*Prosopis pallida*) are also present. Almost all of the parcels have been cleared of vegetation, including Parcel 4 having been cleared of fallow sugar cane in recent times.

CULTURAL HISTORICAL CONTEXT

Of the Hawaiian Islands, the Island of Maui is second in size, with the island of Hawai`i being the largest (Handy and Handy 1972:485). Pu`u Kukui, forming the west end of the island (1,215m above mean sea level), is composed of large, heavily eroded amphitheater valleys that contain well-developed permanent stream systems that watered fertile agricultural lands extending to the coast. The deep valleys of West Maui and their associated coastal regions have been witness to many battles in ancient times and were coveted productive landscapes.

PAST POLITICAL BOUNDARIES

Approximately 600 years ago, the Hawaiian population had expanded throughout the Hawaiian Islands to a point where large, political districts could be formed (Lyons 1903; Kamakau 1991; Moffat and Fitzpatrick 1995). At that time, Maui consisted of four districts, or *moku*: Lāhainā, Wailuku, Makawao, and Hāna. The division of Maui's lands into districts (*moku*) and sub-districts was performed by a *kahuna* (priest, expert) named Kalaiha`ōhia, during the time of the *ali`i* Kaka`alaneo (Beckwith 1940:383; Fornander places Kaka`alaneo at the end of the 15th century or the beginning of the 16th century [Fornander 1919-20, Vol. 6:248]). Land was considered the property of the king or *ali`i `ai moku* (the *ali`i* who eats the island/district), which

he held in trust for the gods. The title of *ali`i `ai moku* ensured rights and responsibilities pertaining to the land, but did not confer absolute ownership. The king kept the parcels he wanted, his higher chiefs received large parcels from him and, in turn, distributed smaller parcels to lesser chiefs. The *maka`āinana* (commoners) worked the individual plots of land.

In general, several terms, such as *moku, ahupua`a, `ili or `ili`āina* were used to delineate various land sections. A district (*moku*) contained smaller land divisions (*ahupua`a*) that customarily continued inland from the ocean and upland into the mountains. Extended household groups living within the *ahupua`a* were, therefore, able to harvest from both the land and the sea. Ideally, this situation allowed each *ahupua`a* to be self-sufficient by supplying the needed resources from different environmental zones (Lyons 1875:111). The *`ili* or *`ili `āina* were smaller land divisions next in importance to the *ahupua`a* and were administered by the chief who controlled the *ahupua`a* in which it was located (Lyons 1875:33; Lucas 1995:40). The *mo`o`āina* were narrow strips of land within an *`ili*. The land holding of a tenant or *hoa `āina* residing in an *ahupua`a* was called a *kuleana* (Lucas 1995:61).

TRADITIONAL AND HISTORIC SETTING

Archaeological settlement pattern data indicates that initial colonization and occupation of the Hawaiian Islands first occurred on the windward shoreline areas around c. A.D. 900, with populations eventually settling into drier leeward areas at later periods (Kirch 1985:87). Coastal settlement was still dominant, but populations began exploiting and living in the upland *kula* (plains) zones. Greater population expansion to inland areas did not occur until around the. A.D. 12th century and continued through the 16th century. Large scale or intensive agricultural endeavors were implemented in association with habitation. Coastal lands were used for settlement and taro was cultivated in near-coastal reaches and in the uplands.

TRADITIONAL SETTLEMENT PATTERNS

The Hawaiian economy was based on agricultural production and marine exploitation, as well as raising livestock and collecting wild plants and birds. Extended household groups settled in various *ahupua`a*. During pre-Contact times, there were primarily two types of agriculture, wetland and dry land, both of which were dependent upon geography and physiography. River valleys, such as those on Maui, provided ideal conditions for wetland *kalo* (*Colocasia esculenta*)—agriculture that incorporated pond fields and irrigation canals *(`auwai*). Other cultigens, such as *kō* (sugarcane, *Saccharum officinaruma*), *mai`a* (banana, *Musa sp*.), and *`uala* (sweet potato, *Ipomoea batatas*) were also grown. This was the typical agricultural pattern seen during traditional times on all the Hawaiian Islands (Kirch and Sahlins 1992, Vol. 1:5, 119;

Kirch 1985). West Maui was more suitable to terracing than the wetter East Maui (Handy and Handy 1972: 488). However, agricultural development was likely to have begun on West Maui and in Kahikinui by c. 1375, during what is known as the Expansion Period (Kirch 1985:304). Between A.D. 600-1100, sometimes referred to as the Developmental Period, the major focus of permanent settlement continued to be the fertile and well-watered windward valleys, such as those in the West Maui mountains in close proximity to Kahului (Kirch 1985). Coastal areas were utilized for marine resources, habitation, burials, and ceremonial structures often associated with fishing (Kirch 1985:88). Trails linked the *makai* and *mauka* sections of the *ahupua`a*, allowing easy access to its resources. Other trails skirted the coast, which made communication between *ahupua`a* possible.

WAHI PANI **(LEGENDARY PLACES)**

Wailuku District was a center of political power often at war with its rival in Hāna. By the end of the 18th century, Kahekili resided with his entourage in Wailuku and it was on the sand dunes that Kahekili and his warriors engaged those of Kalani`ōpu`ū, Chief from Hawai`i Island.

In his bid to conquer Kahekili and obtain Maui (A.D.1776), Kalani`opu`u brought his famous, and fearless, `Ālapa warriors who were slaughtered by Kahekili's men. "The dead lay in heaps strewn like *kukui* branches; corpses lay heaped in death; they were slain like fish enclosed in a net…" (Kamakau1961:85-89).

George W. Bates recounted his journey from Wailuku to Kahului in 1854:

> Leaving Wai-lu-ku [town], and passing along toward the village Kahului, a distance of three miles, the traveler passes over the old battle-ground named after the village. It is distinctly marked by moving sand-hills, which owe their formation to the action of the northeast trades. Here these winds blow almost with the violence of a sirocco, and clouds of sand are carried across the northern side of the isthmus to a height of several hundred feet. These sand-hills constitute a huge "Golgotha" for thousands of warriors who fell in ancient battles. In places laid bare by the action of the winds, there were human skeletons projecting, as if in the act of struggling for resurrection from their lurid sepulchers. In many portions of the plain who cart-loads were exposed in this way. Judging of the numbers of the dead, the contest of the old Hawaiians must have been exceedingly bloody. . . .[*Sandwich Island Notes*, 309]

G.W. Bates' interpretation of a major battleground site in Kahului may not have been accurate, although there are many oral traditions about battles in this general area.

The1776 encounter between Kahekili and Kalani`ōpu`ū resulted in a temporary truce which was broken in 1790 by the battle of Kepaniwai, when Kamehameha I consolidated his control over Maui Island. There were so many warriors and canoes invading from Hawai`i Island that it was called the Great Fleet. During Kahmehameha's campaign, it was recorded that the bay from Kahului to Hopukoa was filled with war canoes and they extended to Kalae`ili`ili at Waihe`e and below Pu`uhele and Kamakailima:

> . . . Kamehameha and his chiefs went on to the principal encounter at Wailuku. The bay from Kahului to Hopukoa was filled with war canoes. For two days there was constant fighting in which many of the most skilful warriors of Maui took part, but Kamehameha brought up the cannon, Lopaka, with men to haul it and the white men, John Young and Isaac Davis, to handle it; and there was great slaughter. (Kamakau 1961: 148).

From Kahului, Kamehameha marched on to Wailuku Village where Kalanikupule, Kahekili's son, waited with his warriors.

In 1837, the village of Kahului consisted of twenty-six *pili*-grass houses living close to the sea and depending on fishing in the coastal waters for the majority of their food (Bartholomew and Bailey 1994). Mullet was still harvested from the twin ponds in the early 1900s and people swam in the spring waters that were continuously refreshed (*ibid*.). Thomas Hogan built the first western building, a warehouse, near the shoreline of Kahului in 1863 (Clark 1980). The dredging of Kahului harbor through the years filled in large sections of the ponds, eventually blocking the outlet to the sea.

As the sugar industry developed, Kahului became a cluster of warehouses, stores, wheelwright and blacksmith shops close to the harbor. A small landing was constructed in 1879 to serve the sugar company (Clark 1980). In the late 1800s, Kahului possessed a new custom house, a saloon, Chinese restaurants, a railroad and a small population of residents. Kahului 's main focus was shipping. The 1900 bubonic plague outbreak destroyed much of the town as officials decided to burn down the Chinatown area in an effort to contain the epidemic. The Chinese, Japanese and Hawaiian residents were displaced by this action. To further insure isolation, authorities encircled the entire town with corrugated iron rat-proof fences which ended the spread of the plague (Bartholomew and Bailey 1994). The Kahului Railroad Company built a 1,800 foot long rubble-mound breakwater in 1910 and dredging of the harbor now allowed ships with a 25-foot draft to dock at the new 200-foot wharf (Clark 1980).

TRADITIONAL SETTING

According to Kamakau (1870 in Sterling 1998: 2), "...the ancient name of the island of Maui was Ihikapalaumaewa...". The island was renamed "...after a famous child of Wakea and Papa who became ancestor of the people of Maui (*ibid*). The town of Kahului is situated within the Wailuku Ahupua`a and Wailuku District. "Wailuku" translated literally means "water of destruction" (Pukui *et al*.:225). The following is a brief summary of the salient aspects of these data. The project area is located in the *ahupua`a* of Wailuku.

The Wailuku District was once known as "The Four Streams Area" (*Na Wai Eha*), which refers to the four main valleys that drain the eastern slopes of West Maui, including the massive `Īao Valley (Handy and Handy 1972: 496-498). The area from Waihe`e to Wailuku was formally the most extensive continuous area of wet taro cultivation in the Hawaiian Islands. Wailuku, itself, has been described as a "chiefly center" (Sterling 1998:90), although the seat of power was almost certainly concentrated in and around the `Īao Valley, on the other (west) side of Wailuku from the project area. Areas upslope and west of the project area, including Wailuku Town, were once covered with *lo`i* (irrigated stone terraces) and house sites. Areas downslope and closer to the project area were burial grounds in traditional times.

Areas around the Waihe`e and Waiehu Streams, although a few miles north of the project area, have yielded some of the earliest settlement dates in Maui (Kirch 1985). Cordy *et al.* (1978) have proposed that the coast and lower valleys in this area were first settled by A.D. 300 to 600. Closer to the project area, the Wailuku Sand Hills, about a mile to the west, have yielded substantial numbers of burials and other evidence of traditional Native Hawaiian settlement (see PREVIOUS ARCHAEOLOGY section below).

Sterling's (1998) compendium of traditional archaeological sites on Maui has much to say about the Wailuku District, in general, and the Wailuku Ahupua`a, in particular. Documented *heiau* from Wailuku Ahupua`a include:

- Kaluli Heiau (Walker Site 42)—since destroyed
- Pihana Heiau (Walker Site 43)—located just west of the Sand Hills (Wailuku)
- Halekii Heiau (Walker Site 44)—located just north of the Sand Hills (Wailuku)
- Various Heiau (Walker Sites 45–54)—ten named *heiau* in Wailuku, all destroyed

A major inland fishpond was located at the present day spot of Kanahā Pond and Bird Sanctuary, just west of the project area. In traditional times, this was sometimes referred to as

two, artificially joined ponds (Kanahā and Mauoni). According to Puea-a-Makakaualii (a.k.a. Mrs. Rosalie Blaisdell) an informant of J.F. G. Stokes (1918 in Sterling 1998:87),

> Kapiiohookalani, king of Oahu and half of Molokai, built the banks of *kuapa* on Kanaha and Mauoni, known as the twin ponds of Kapiioho...he used men from Oahu and Molokai as well as those of Maui...Tradition relates that the laborers stood so closely together that they passed the stones from hand to hand. The line extended from Makawela...to Kanaha.

Prior to the completion of the ponds, Kapiioho was killed in the battle at Kawela , Moloka`i by Alapainui, of Hawai`i Island. The ponds were subsequently completed by Kamehamehanui, king of Maui (*ibid*).

HISTORIC PERIOD (1778-EARLY 1900s)

Traditional land utilization was rapidly and dramatically supplanted by sugar cane cultivation during the 1850s (Dorrance and Morgan 2000). Documentation of 19th century land use in the area is much more pronounced, which also may mean that limited traditional period activities occurred in and near the current project area. Many of the awarded Land Commission Awards (see Māhele discussion below) in Wailuku Ahupua`a were under sugar cane cultivation by the mid-nineteenth century. Sites and features built during this period include water irrigation ditches, terraces, free standing walls, historic houses, and mill structures. Cultivation of sugar cane dominated land use in Wailuku Ahupua`a from the 1880s through the 1990s (see Tuggle and Welch 1995:24).

THE MĀHELE

In the 1840s, traditional land tenure shifted drastically with the introduction of private land ownership based on Western law. While it is a complex issue, many scholars believe that in order to protect Hawaiian sovereignty from foreign powers, Kauikeaouli (Kamehameha III) was forced to establish laws changing the traditional Hawaiian economy to that of a market economy (Kuykendall 1938, Vol. I: 145; Daws 1968:111; Kelly 1983:45, 1998:4; Kame`eleihiwa 1992:169–70, 176). The Māhele of 1848 divided Hawaiian lands between the king, the chiefs, the government, and began the process of private ownership of lands. The subsequently awarded parcels were called Land Commission Awards (LCAs). Once lands were made available and private ownership was instituted, the *maka`āinana* were able to claim the plots on which they had been cultivating and living, if they had been made aware of the procedures. These claims did not include any previously cultivated but presently fallow land, *`okipū* (on O`ahu), stream fisheries, or many other resources necessary for traditional survival (Kelly 1983; Kame`eleihiwa 1992:295; Kirch and Sahlins 1992). If occupation could be established through the testimony of

two witnesses, the petitioners were awarded the claimed LCA and issued a Royal Patent after which they could take possession of the property (Chinen 1961:16).

Literally hundreds of Land Commission Awards are documented for Wailuku Ahupua`a (see, *e.g.,* Sterling 1998:86; Burgett and Spear 2003), although, in keeping with the broad settlement pattern outlined above, most of these were located in and around `Īao Valley, west of the Wailuku Town and well removed from the project area. The existence of such large numbers of LCAs, however, attests to the large settlements in the lower `Īao Valley during the mid-nineteenth century; residents of Kahului were no doubt drawn into this sphere of influence. According to the Waihona `Aina database (2012), there were over 400 *kuleana* awarded in the district of Wailuku, but none were identified in the project area.

Pertinent to the current project area, particularly Parcel 4 [TMK: (2) 3-8-079:021] , lands inclusive of this parcel were considered Crown Lands (c. 1848). To summarize Fredericksen and Fredericksen (1988:8-11), in 1882, the fee title to many lots/parcels in the Wailuku area were acquired by Claus Spreckles under Grant 3343 (from 'King Kalakaua'). The property consisted of 24,000 acres of land from Wailuku to Paia and toward Ma`alaea, a portion of which included the current Parcel 4 [TMK: (2) 3-8-079:021], near the highway. In 1885, the property was sold by the Spreckles to the Hawaiian Commercial and Sugar Company, a California company owned by the Spreckles, for five dollars. The company was located in San Francisco, California, with the plantation headquarters being in Spreckelsville, Maui. In 1898, Hawaiian Commercial and Sugar Company was purchased by James Castle, William Castle, Henry Baldwin, and Samuel Alexander, the latter two founding the Alexander and Baldwin company. The Hawaiian Commercial and Sugar Company constructed the Puunene Mill in 1902 to increase production and the Koolau Ditch in 1904 to transport more water to the mill. By 1928, the annual crop production had reached 70,000 tons of sugar. Parcel 4 of the current study was part of this production zone. Also in the 1920s, a railroad was constructed to haul the cane; the railroad was present just to the north of current Parcel 5 (see Tuggle and Welch 1995:19). Interestingly, a portion of the Parcel 5 [TMK: (2) 3-8-001:123] area was cut and filled between 1924 and 1964, during the various phases of construction in the area, including many of the NASKA facilities, which mostly were built to the north of the current project area. These facilities included buildings/offices, support facilities, magazines, and other infrastructure.

According to Tuggle and Welch (1995), during World War II (1942), the current airport area was leased by the U.S. Military and developed into Naval Air Station, Kahului (NASKA), with at least one-third of these lands still being in sugar cane. Areas inland of Runway 2/20 were

sugar cane lands from the 1880s through construction of the airport and camps occurred in the area, near the fields, to the 1950s when they were torn down. After the war, in the early 1950s, air facilities were acquired by the Territorial government and utilized for commercial and general aviation purposes. In 1954 a third runway was constructed. This airport has since developed into the major transport hub seen today.

ARCHAEOLOGY

Multiple archaeological investigations have been conducted over the past few years near the present project area in Kahului, Maui. Inventory Survey and Monitoring programs have yielded variable results. The subsequent text provides a brief overview of previous archaeological work conducted in the very general vicinity of the Kahului Airport area, followed by a listing of the known sites occurring within or very near the airport itself.

To date, Xamanek Researches conducted the most intensive study of the area through Archaeological Inventory Survey (Fredericksen and Fredericksen 1988). The inventory survey led to the identification (but not full recordation) of what were initially interpreted as several volcanic glass concentrations, historic irrigation ditches, and old stream gravels. The volcanic glass debris was later re-interpreted as slag associated with mill production. No subsurface deposits were identified near Dairy Road in former sugarcane lands, within currently studied Parcel 4 [TMK: (2) 3-8-079:021].

Cultural Surveys of Hawaii, Inc conducted Archaeological Inventory Survey adjacent to Kalialinui Drainage Canal (which was under construction in 1990 during the fieldwork), between the airport and Hana Highway, to the north of the present project area (Folk and Hammatt 1991). The survey resulted in the documentation of a buried A-horizon and two basalt boulder alignments. The A-horizon, a former living surface, was encountered in sandy deposits near the coastline, an environment quite different from the current project area.

Scientific Consultant Services , Inc. has conducted Archaeological Monitoring during construction activities in and around the airport property (Shefcheck and Dega 2006a, 2006b). The proposed access road work was divided into two phases. Phase I referred to the western half of the new road, from the corner of Dairy Road and Puunene Avenue, to the nexus of the proposed road and Hana Highway. This first phase included improvements to Dairy Road itself, as well as the construction of a new road originating just east of the First Assembly of God Subdivision and stretching eastward to Hana Highway. Phase II was continued east from Hana

Highway to the north side of Kahului Airport. The second phase also included improvements Hana Highway itself.

Phase I will consist of roadway and drainage improvements in areas that have been previously disturbed and impacted by the existing airport infrastructure. Phase II will include all additional work necessary to complete the project and will include improvements/construction in areas not previously impacted by existing airport infrastructure. The proposed Runway Safety Area improvements (RSA) encompassed an area 250 to 300 feet on either side of the runway, the centerline of which defines the limits of the RSA work. Archaeological Monitoring of these areas did not lead to the identification of any historic properties (Shefcheck and Dega 2006a, 2006b).

ARCHAEOLOGICAL PROJECTS CONDUCTED IN THE VICINITY

Multiple archaeological sites have been identified within the airport proper. These sites, and one letter report pertaining to a recent Archaeological Reconnaissance Survey of the airport area, are discussed individually below to provide a more immediate background to the proposed project area archaeology. This information is paraphrased from a Xamanek Researches, LLC Letter to the State Historic Preservation Division dated January 20, 2006 (Xamanek Researches, LLC. 2006).

State Site 50-50-05-1777: This site consists of a Traditional-type cultural deposit occurring in subsurface contexts. Subsurface features, midden, and artifacts were documented at the site, all interpreted as related to prehistoric habitation. The site was dated to A.D. 1380-1700, firmly within the pre-Contact Period.

State Site 50-50-05-1798: This site is composed of multiple burials and is located outside the RSA to the northeast of "Runway 5-23." Significant features at the site include a burial re-interment area (from c. 20 years ago), a subterranean terrace wall, and associated pond field deposits (gleys, alluvium).

State Site 50-50-05-1799: This site consists of a 4 m long rock alignment and a possible coral pavement. The site was identified to the north of State Site 50-50-04-1798.

State Site 50-50-05-2849: This site consists of an extensive subterranean cultural deposit located at the east end of the airport property at Papa`ula Point. Papa`ula Point is translated by Mary Kawena Pukui as "red flats" (Pukui *et al* 1974:180).

State Site 50-50-05-4197: This historic-period site is composed of features related to the former World War II Naval Air Station (NASKA).

State Site 50-50-05-1783: This site consists of Kanahā Pond itself. Kanahā Pond is said to have been built by the legendary Ali`i Kihaapi`ilani, brother in law of `Umi who lived about A.D. 1500 (Pukui *et al* 1974:83). *Āe`o* (Hawaiian stilt) populate the pond and 50 or more other bird species have been observed in this area, indicating the rich resources the pond offers, in modern and traditional times. Kanahā Pond is currently designated as wildlife refuge.

Letter Report (Xamanek Researches, LLC. dated January 20, 2006): Xamanek conducted a Field Inspection within a portion of the Kahului Airport at TMK: (2) 3-8-001:019. Several previously unknown sites were identified during the Field Inspection. These consisted of a re-deposited surface scatter, a linear wall, and a possible platform. Further work related to these sites occurred during Scientific Consultant Services recent Archaeological Inventory Survey (Bassford and Dega 2012).

Scientific Consultant Services, Inc. conducted an Archaeological Assessment for the Wailuku Force Main Project in Wailuku and Kahului, Maui [Portions of TIMK:3-04-27; 3-07-001, 002, 003, 004, 007-011; 3-08-007] (McGerty and Spear 2001). As noted in the Kahului area and throughout Hawai`i, and as summarized by McGerty and Spear (2001), there is an acute positive relationship between the presence of sandy substrate and traditional native Hawaiian burials (see Kirch 1985). Archaeological studies conducted around the perimeter of Kahului Bay and slightly inland (inclusive of the current project area) have led to the identification of deposits related to remnants of the old Kahului Railroad bed, historic refuse, pre-Contact artifacts, midden, and isolated findspots of human remains. The depth of these cultural resources varies depending on previous construction activities in an area but often, these deposits have been identified from 0.2–2.0 meters below the ground surface. Many of these resources are associated with sandy substrata, which is similar to that in the project area.

In 2006, Scientific Consultant Services, Inc. conducted an Archaeological Inventory Survey of multiple areas around the airport runways (Morawski and Dega 2006). The inventory survey yielded negative findings as no Traditional- or Historic-type cultural materials were identified either on the ground surface or in subsurface deposits.

In 2012, Scientific Consultant Services conducted Archaeological Inventory Survey for the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021] (Bassford and Dega 2012). During the survey two archaeological sites were newly identified (State Sites 50-50-04-7347 and 50-50-04-7348). State Site 50-50-04-7374 consisted of an historic-era concrete flume (Figures 10, 11 and 12. State Site Number 50-50-04-

Figure 10: Photograph of State Site 50-50-04-7347 Flume. View to North.

Figure 11: Photographic Close-Up of State Site 50-50-04-7347 Flume. View to West. Note Concrete Sidewalls.

Figure 12: Photograph of State Site 50-50-04-7348 Generator Building. View to Southeast. Note: Mounded Area behind Structure is Massive Bulldozer-Created Earthen Berm (Modern).

7348 consisted of small generator building which was interpreted as associated with former Navy use of the lands (see Figure 12).

CONSULTATION

Analysis of the potential effect of the project on cultural resources, practices or beliefs, its potential to isolate cultural resources, practices or beliefs from their setting, and the potential of the project to introduce elements which may alter the setting in which cultural practices take place is a requirement of the OEQC (No. 10, 1997). As stated earlier, this includes the cultural resources of the different groups comprising the multi-ethnic community of Hawai`i.

As stated above, consultation was conducted via telephone, e-mail, and the U.S. Postal Service. Consultation was sought from the Central Maui Hawaiian Civic Club; Raymond Hutaff, County of Maui Cultural Resources Commission; Perry Artates, County of Maui Cultural Resources Commission; Thelma Shimaoka, Maui Office of Hawaiian Affairs; Kamana`opono M. Crabbe, Chief Executive Officer, Office of Hawaiian Affairs; Vincent Hinano Rodrigues, State Historic Preservation Division. In addition, SCS archaeologist Cathleen Dagher attended the September 6, 2012 County of Maui Cultural Resource Commission monthly meeting in an attempt to consult with the Commissioners and local residents. Following the County of Maui Cultural Resources Commission September 2012 meeting, a letter of inquiry was electronically transmitted to Kepa Maly, historian.

In addition, a Cultural Impact Assessment Notice was published on August 1, 2, and 5, 2012, in *The Honolulu Star-Advertise*r and in *The Maui News*, which published on the same dates on Maui, and the September 2012 issue of the OHA newspaper, *Ka Wai Ola* (see Appendix B). These notices requested information of cultural resources or activities in the area of the proposed project, stated the Tax Map Key (TMK) number, and where to respond with pertinent information. Based on the responses, an assessment of the potential effects on cultural resources in the project area and recommendations for mitigation of these effects can be proposed.

CULTURAL IMPACT ASSESSMENT INQUIRY RESPONSES

As stated above, consultation was sought from the Central Maui Hawaiian Civic Club; Raymond Hutaff, County of Maui Cultural Resources Commission; Perry Artates, County of Maui Cultural Resources Commission; Thelma Shimaoka, Maui Office of Hawaiian Affairs; Kamana`opono M. Crabbe, Chief Executive Officer, Office of Hawaiian Affairs; Vincent Hinano Rodrigues, State Historic Preservation Division, and Kepa Maly, historian. In addition, SCS

archaeologist Cathleen Dagher attended the September 6, 2012 County of Maui Cultural Resource Commission monthly meeting in an attempt to consult with the Commissioners and local residents. Cultural Impact Assessment Legal Notices were published in *The Honolulu Star-Advertiser* and *The Maui News* on August 1, 2, and 5, 2012, and the September 2012 issue of the OHA newspaper, Ka Wai Ola (see Appendix B). Follow-up letters of inquiry were mailed to be above-mentioned individuals (see Appendix C). To date, no responses to the consultation efforts have been received.

To our knowledge, the project area has not been used for traditional cultural purposes within recent times. Based on historical research and the lack of response to consultation efforts, it is reasonable to conclude that Hawaiian rights related to gathering, access or other customary activities within the project area will not be affected and there will be no direct adverse effect upon cultural practices or beliefs. The visual impact of the project from surrounding vantage points, e.g. the highway, mountains, and coast is minimal.

SUMMARY

The "level of effort undertaken" to identify potential effect by a project to cultural resources, places or beliefs (§11-200-A HAR) has not been officially defined and is left up to the investigator. A good faith effort can mean contacting agencies by letter, interviewing people who may be affected by the project or who know its history, research identifying sensitive areas and previous land use, holding meetings in which the public is invited to testify, notifying the community through the media, and other appropriate strategies based on the type of project being proposed and its impact potential. Sending inquiring letters to organizations concerning development of a piece of property that has already been totally impacted by previous activity and is located in an already developed industrial area may be a "good faith effort". However, when many factors need to be considered, such as in coastal or mountain development, a good faith effort might mean an entirely different level of research activity.

Historical and cultural source materials were extensively used and can be found listed in the References Cited portion of the report. Such scholars as Samuel Kamakau, Martha Beckwith, Jon J. Chinen, Lilikalā Kame`eleihiwa, R. S. Kuykendall, Marion Kelly, E. S. C. Handy and E.G. Handy, Elspeth P. Sterling, and Mary Kawena Puku`i and Samuel H. Elbert. These sources continue to contribute to our knowledge and understanding of Hawai`i, past and present. The works of these and other authors were consulted and incorporated in the report where appropriate. Land use document research was supplied by the Waihona `Aina 2012 Database

In the case of the current undertaking, letters of inquiry were sent to individuals and organizations that may have knowledge or information pertaining to the collection of cultural resources and/or practices currently , or previously conducted in close proximity to the Kahului Airport.

In the case of the proposed undertaking, consultation was sought from individuals and organizations that may have knowledge or information pertaining to the collection of cultural resources and/or practices currently, or previously conducted in close proximity to the Kahului Airport. These agencies and individuals included the Central Maui Hawaiian Civic Club; the County of Maui Cultural Resources Commission via letters of inquiry and in-person; Thelma Shimaoka, Maui Office of Hawaiian Affairs; Kamana`opono M. Crabbe, Chief Executive Officer, Office of Hawaiian Affairs; Vincent Hinano Rodrigues, State Historic Preservation Division. In addition, SCS archaeologist Cathleen Dagher attended the September 6, 2012 County of Maui Cultural Resource Commission monthly meeting in an attempt to consult with the Commissioners and local residents. Following the County of Maui Cultural Resources Commission September 2012 meeting, a letter of inquiry was electronically transmitted to Kepa Maly, historian. In addition, a Cultural Impact Assessment Legal Notice was published on August 1, 2, and 5, 2012, in *The Honolulu Star-Advertise*r, *The Maui News*, which published on the same dates on Maui, and the September 2012 issue of the OHA newspaper, *Ka Wai Ola* (see Appendix B). To date, no responses to the consultation efforts have been received.

CULTURAL ASSESSMENT

Analysis of the potential effect of the project on cultural resources, practices or beliefs, its potential to isolate cultural resources, practices or beliefs from their setting, and the potential of the project to introduce elements which may alter the setting in which cultural practices take place is also a suggested guideline of the OEQC (No. 10, 1997). To our knowledge, the project area has not been used for traditional cultural purposes within recent times. Analysis of the potential effect of the project on cultural resources, practices or beliefs, its potential to isolate cultural resources, practices or beliefs from their setting, and the potential of the project to introduce elements which may alter the setting in which cultural practices take place is a requirement of the OEQC (No. 10, 1997). To our knowledge, the project area has not been used for traditional cultural purposes within recent times.

Based on the archival research and the lack of response to consultation efforts, it is reasonable to conclude that, pursuant to Act 50, the exercise of native Hawaiian rights, or any

ethnic group, related to gathering, access or other customary activities will not be affected by development activities on the approximately 40-acres of land on and around the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021].

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APPENDIX A: EXAMPLE LETTER OF INQUIRY

July 27, 2012

Dear Sir or Madam:

In compliance with the statutory requirements of the Federal National Environmental Policy Act (NEPA), and with the State of Hawai‘i Revised Statute (HRS) Chapter 343 Environmental Impact Statements Law, and in accordance with the State of Hawai`i Department of Health's Office of Environmental Quality Control (OEQC) Guidelines for Assessing Cultural Impacts as adopted by the Environmental Council, State of Hawai`i on November 19, 1997, Scientific Consultant Services, Inc. (SCS) is in the process of preparing a Cultural Impact Assessment (CIA) pertaining to consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001:123, 3-8-001:239, and 3-8-079:021] (Figures 1through 3).

Scientific Consultant Services has conducted an Archaeological Inventory Survey of the three parcels on 40-acres of undeveloped land adjacent to the Kahului Airport (Bassford and Dega 2012). Two historic properties were newly identified during survey of the project area: an historic-era concrete flume (State Site Number 50-50-04-7347) and a generator building likely associated with former Navy use of the lands (State Site Number 50-50-04-7348). State Site 50-05-04-7347 was located in Parcel 4, former cane lands, while State Site 50-50-04-7348 was located in Parcel 5, just to the north of the airport (see Figures 1 through 3). No cultural deposits were identified within any of the 36 trenches tested across the project area.

According to the *Guidelines for Assessing Cultural Impacts* (Office of Environmental Quality Control, Nov. 1997):

> The types of cultural practices and beliefs subject to assessment may include subsistence, commercial, residential, agricultural, access-related, recreational, and religious and spiritual customs…The types of cultural resources subject to assessment may include traditional cultural properties or other types of historic sites, both man made and natural which support such cultural beliefs…

We are asking you for any information that you or other individuals have which might contribute to the knowledge of traditional cultural activities that were, or are currently, conducted in the proposed project area. We are also asking for any information pertaining to traditional cultural activities or traditional rights which may be impacted by the proposed improvements. The results of the cultural impact assessment are dependent on the response and contributions made by individuals and organizations such as the Central Maui Hawaiian Civic Club.

Enclosed are maps showing the proposed project areas. Please contact me at the Scientific Consultant Services, Honolulu, office at (808) 597-1182 or via e-mail (cathy@scshawaii.com) with any information or recommendations concerning this Cultural Impact Assessment.

Sincerely,

Cathleen Dagher
Senior Archaeologist
Enclosures (3)

Cc: Hinano Rodrigues, State Historic Preservation Division, Maui; Raymond Hutaff, County of Maui Cultural Resources Commission; Perry Artates, County of Maui Cultural Resources Commission; Thelma Shimaoka, Maui Office of Hawaiian Affairs; Kamana`opono M. Crabbe, Chief Executive Officer, Office of Hawaiian Affairs; Central Maui Civic Club

APPENDIX B: LEGAL NOTICES

CULTURAL IMPACT ASSESSMENT NOTICE POSTED IN THE OFFICE OF HAWAIIAN AFFAIRS NEWSLETTER (KA Wai OLA NEWSPAPER), MAUI NEWS, AND IN THE STAR-ADVERTISER NEWSPAPER

Information requested by Scientific Consultant Services, Inc. (SCS) on cultural resources or on-going cultural activities on or near the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021]. Please respond within 30 days to Cathleen Dagher at (808) 597-1182

(1292)

AFFIDAVIT OF PUBLICATION

IN THE MATTER OF
CULTURAL IMPACT ASSESSMENT NOTICE

STATE OF HAWAII }
} SS.
City and County of Honolulu }

Doc. Date: AUG - 6 2012 **# Pages:** 1
Notary Name: Patricia K. Reese First Judicial **Circuit**
Doc. Description: Affidavit of Publication

Notary Signature — AUG - 6 2012 Date

PATRICIA K. REESE NOTARY PUBLIC Comm. No. 86-467 STATE OF HAWAII

Rose Rosales being duly sworn, deposes and says that she is a clerk, duly authorized to execute this affidavit of Oahu Publications, Inc. publisher of The Honolulu Star-Advertiser and MidWeek, that said newspapers are newspapers of general circulation in the State of Hawaii, and that the attached notice is true notice as was published in the aforementioned newspapers as follows:

Honolulu Star-Advertiser 3 times on:
08/01, 08/02, 08/05/2012

Midweek Wed. 0 times on:

_____ times on:

And that affiant is not a party to or in any way interested in the above entitled matter.

Rose Rosales

Subscribed to and sworn before me this 6th day
of August, A.D. 20 12

Patricia K. Reese, Notary Public of the First Judicial Circuit, State of Hawaii
My commission expires: Oct 07 2014

PATRICIA K. REESE NOTARY PUBLIC Comm. No. 86-467 STATE OF HAWAII

Ad # 0000438889

LN: _____

CULTURAL IMPACT ASSESSMENT NOTICE

Information requested by Scientific Consultant Services, Inc. (SCS) on cultural resources on-going cultural activities on or near the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku-Ahupua'a, Wailuku District, Maui Island, Hawai'i (TMK: (2) 3-8-001:123, 239 and 3-8-079:021). Please respond within 30 days to Cathleen Dagher at (808) 597-1182.
(SA438889 8/1, 8/2, 8/5/12)

1292

AFFIDAVIT OF PUBLICATION

STATE OF HAWAII, }
County of Maui. } ss.

Rhonda M. Kurohara being duly sworn deposes and says, that she is in Advertising Sales of the Maui Publishing Co., Ltd., publishers of THE MAUI NEWS, a newspaper published in Wailuku, County of Maui, State of Hawaii; that the ordered publication as to Information requested by Scientific Consultant Services, Inc.

of which the annexed is a true and correct printed notice, was published 3 times in THE MAUI NEWS, aforesaid, commencing on the 1st day of August, 2012, and ending on the 5th day of August, 2012, (both days inclusive), to-wit: on August 1, 2, 5, 2012

and that affiant is not a party to or in any way interested in the above entitled matter.

Rhonda M. Kurohara

This 1 page Information requested, dated August 1, 2, 5, 2012, was subscribed and sworn to before me this 6th day of August, 2012, in the Second Circuit of the State of Hawaii, by Rhonda M. Kurohara

Notary Public, Second Judicial Circuit, State of Hawaii
BETTY E. UEHARA
My Commission expires 09-20-13

BETTY E. UEHARA NOTARY PUBLIC No. 93-344 STATE OF HAWAII

Information requested by **Scientific Consultant Services, Inc.** (SCS) on cultural resources or on-going cultural activities on or near the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua'a, Wailuku District, Maui Island, Hawai'i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021]. Please respond within 30 days to Cathleen Dagher at (808) 597-1182.
(MN: Aug. 1, 2, 5, 2012)

CULTURAL IMPACT ASSESSMENT NOTICE POSTED IN THE OFFICE OF HAWAIIAN AFFAIRS NEWSLETTER (KA Wai OLA NEWSPAPER), MAUI NEWS, AND IN THE STAR-ADVERTISER NEWSPAPER

Information requested by Scientific Consultant Services, Inc. (SCS) on cultural resources or on-going cultural activities on or near the proposed consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001:123, 239 and 3-8-079:021]. Please respond within 30 days to Cathleen Dagher at (808) 597-1182

APPENDIX C: EXAMPLE FOLLOW-UP LETTER OF INQUIRY

August 17, 2012

Dear Sir or Madam:

This is our follow-up letter to our July 27, 2012 letter which was in compliance with the statutory requirements of the Federal National Environmental Policy Act (NEPA), the State of Hawai‘i Revised Statute (HRS) Chapter 343 Environmental Impact Statements Law, and in accordance with the State of Hawai`i Department of Health's Office of Environmental Quality Control (OEQC) Guidelines for Assessing Cultural Impacts as adopted by the Environmental Council, State of Hawai`i, on November 19, 1997.

Scientific Consultant Services, Inc. (SCS) is in the process of preparing a Cultural Impact Assessment (CIA) pertaining to consolidated rental car facility and associated improvements at Kahului Airport in Kahului, Wailuku Ahupua`a, Wailuku District, Maui Island, Hawai`i [TMK: (2) 3-8-001:123, 3-8-001:239, and 3-8-079:021].

Scientific Consultant Services has conducted an Archaeological Inventory Survey of the three parcels on 40-acres of undeveloped land adjacent to the Kahului Airport (Bassford and Dega 2012). Two historic properties were newly identified during survey of the project area: an historic-era concrete flume (State Site Number 50-50-04-7347) and a generator building likely associated with former Navy use of the lands (State Site Number 50-50-04-7348). State Site 50-05-04-7347 was located in Parcel 4, former cane lands, while State Site 50-50-04-7348 was located in Parcel 5, just to the north of the airport. No cultural deposits were identified within any of the 36 trenches excavated across the project area.

We are asking you for any information that might contribute to the knowledge of traditional activities, or traditional rights that might be impacted by development of the property. The assessment results are dependent on the response and contributions made by organizations such as the Central Maui Hawaiian Civic Club.

Please contact me at the Scientific Consultant Services, Honolulu, office at (808) 597-1182 or via e-mail (cathy@scshawaii.com) with any information or recommendations concerning this Cultural Impact Assessment.

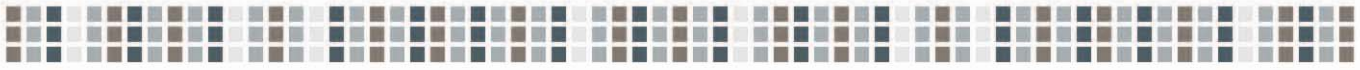
Sincerely,

Cathleen Dagher
Senior Archaeologist

Cc: Hinano Rodrigues, State Historic Preservation Division, Maui; Raymond Hutaff, County of Maui Cultural Resources Commission; Perry Artates, County of Maui Cultural Resources Commission; Thelma Shimaoka, Maui Office of Hawaiian Affairs; Kamana`opono M. Crabbe, Chief Executive Officer, Office of Hawaiian Affairs; Central Maui Civic Club

Appendix G

Air Quality Analysis



Appendix G Air Quality Analysis

G.1 Introduction

A construction emissions analysis was conducted to develop construction emissions inventories pursuant to the National Environmental Policy Act of 1969 (NEPA), and to determine whether emissions associated with the Proposed Action exceed levels of significance thresholds set forth in State of Hawaii Administrative Rules (HAR §11-60.1). The methods used to calculate emissions of carbon monoxide (CO), volatile organic compounds (VOCs), oxides of nitrogen (NO_X), sulfur oxides (SO_X), particulate matter less than 10 microns (PM_{10}), and fine particulate matter ($PM_{2.5}$) from construction-related sources of air pollutant emissions at the Airport associated with construction of the Proposed Action are documented in this appendix.

Components of the Proposed Project included in the construction emissions analysis include construction of the consolidated rental car facility and construction of two stormwater detention basins (Basins 1 and 5). While the Proposed Action does include connections to the terminal roadway system, this analysis does not include estimates of emissions associated with construction of the new/revised terminal access roadway proposed to intersect with Hana Highway southwest of the Proposed Action site. Such emissions have been evaluated in separate environmental studies.

G.2 Data Sources and Methodology

Construction emissions analyses generally require information such as the type of construction equipment to be used, the amount of time the equipment will operate, estimates of required construction material, areas to be paved, and the number of employees anticipated to be on site. Such data was largely unavailable for purposes of conducting this analysis. To estimate construction emissions associated with the Proposed Action, applicable data were derived and scaled from data used to develop prior construction emissions analyses for projects that included components generally applicable to the projects/facilities included in the Proposed Action.

To estimate activity associated with construction of the consolidated rental car facility, construction estimates were scaled from data provided by Bechtel Infrastructure Corporation in support of the Supplemental

Environmental Assessment for construction of Terminal 3 at McCarran International Airport.[1] In particular, the Terminal 3 project included the construction of a large multi-level vehicle parking structure involving a number of construction activities, such as site preparation/excavation and grading, foundations and underground utilities, concrete placements for each level, construction of a two-story office building, employee parking lot with connecting roadways, interior finishes, and the installation of electrical, lighting, plumbing, and other systems and equipment. Taken together, these construction elements were assumed to be generally representative of the elements identified for the proposed consolidated rental car facility, as listed in Section 1.5 of this EA. The data provided by Bechtel included a comprehensive list of construction equipment types, including horsepower ratings, fuel type, and hours of operation by individual project task.

Construction estimates associated with construction of the two stormwater detention basins were scaled from data provided by ECM International, Inc. in support of a transit center development at El Paso International Airport.[2] The transit center project included construction of a large lined stormwater detention pond.

The methodology used to develop activity estimates for the Proposed Action was as follows:

- Proposed Action project components were matched to similar project components of an applicable reference project, as described previously.
- An appropriate unit measurement (i.e., area) for the Proposed Action component was divided by the unit measurement of the corresponding reference project component. For example, a scaling factor was calculated by dividing the area of the proposed consolidated rental car facility by the area of the vehicle parking structure project associated with the overall Terminal 3 project.
- Activity, materials, and labor estimates (as appropriate) developed by Bechtel or ECM were scaled based on the scaling factor calculated previously to derive construction estimates for the corresponding Proposed Action component.

In addition to construction estimates derived/scaled from the data described above, additional project-specific information sources used to conduct the construction emissions analysis included information provided in Section 1 of this EA, electronic CAD files, concept photos and presentations, and conversations with project engineers/designers.

Construction activity estimates were allocated among years based on an assumed construction schedule. Construction of the consolidated rental car facility was assumed to begin in January 2014, with assumed completion in June 2015. Construction of the stormwater detention basins was assumed to occur in the front end of the overall project, with an estimated duration of 6 months. Therefore, activities associated construction of the stormwater detention basins were assumed to occur from January 2014 to June 2015.

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1 Ricondo & Associates, Inc., *Final Supplemental Environmental Assessment of the Construction of Terminal 3 at McCarran International Airport*, September 2005.

2 Ricondo & Associates, Inc., *Sun Metro Terminal EA*, July 2012.

G.3 Construction Emissions Analysis

Estimates of construction-related emissions were developed for the Proposed Action using standard industry methodologies and techniques. Sources of construction emissions estimated in this analysis included construction vehicles and equipment.[3] Construction equipment emissions are generally estimated using two basic methodologies (nonroad and on-road) depending on the type of construction equipment. Nonroad construction equipment (e.g., bulldozers, backhoes, front end loaders) are generally operated off road and on the construction site. On-road construction equipment (e.g., semi-trucks for material hauling), in contrast, can be operated on public roads. Emissions for on-road construction equipment and nonroad construction equipment were estimated separately, following standard industry practices.

G.3.1 ON-ROAD CONSTRUCTION EQUIPMENT

Emissions from on-road construction vehicles/equipment were calculated using the methodologies outlined in U.S. EPA AP-42, *Compilation of Air Pollutant Emission Factors Fourth Edition, Volume II: Mobile Sources*.[4] On-road construction vehicle trips include construction employee vehicle trips to and from the job site, off-site hauling trips, and material delivery trips.

The first step in calculating total on-road construction equipment emissions was to determine total VMT during each construction year. VMT is calculated by multiplying the total number of vehicle trips by the trip distance.

For construction employee vehicle trips, it was assumed that employees would travel a roundtrip distance of 20 miles per trip. Hauling/material delivery trips include deliveries of concrete and construction materials, as well as hauling excavated material from the construction site. All hauling/material delivery trips were assumed to be 40 miles roundtrip. Where applicable, concrete was assumed to be delivered in transit mixer trucks with a capacity of 10 cubic yards.

The VMT data were then multiplied by appropriate emissions factors to calculate potential emissions. The emissions factor data were developed using the MOBILE6.2 module in the FAA's Emissions and Dispersion Modeling System, Version 5.1.3, assuming an average speed of 35 miles per hour for all trip types.

Table G-1 presents the MOBILE6.2 emission factors used to calculate emissions for on-road construction equipment for the Proposed Action for 2014 and 2015. The emission factor for entrained road dust accounts for emissions of fugitive dust particulate matter entrained by vehicular travel on paved roads.

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[3] It was assumed that asphalt and concrete would be batched offsite at batch plant facilities operating under applicable stationary source permits and therefore, emissions were not estimated separately for batch plants.

[4] U.S. Environmental Protection Agency. *Compilation of Air Pollutant Emission Factors AP-42, Volume II: Mobile Sources,* 1989.

Table G-1 On-Road Construction Equipment Emission Factors

	EMISSION FACTORS (GRAMS/VEHICLE-MILE) [1/]						
YEAR	CO	VOC	NO_X	SO_X	PM_{10}	$PM_{2.5}$	ENTRAINED ROAD DUST [2/]
2014	5.765	0.504	0.744	0.009	0.034	0.018	0.0000004390
2015	5.588	0.477	0.676	0.009	0.032	0.017	0.0000004390

Notes:

1/ Assuming an average speed of 35 miles per hour for on-road vehicle trips.

2/ Entrained road dust emission factor measured in tons/vehicle-mile and derived from U.S. Environmental Protection Agency, *Compilation of Air Pollutant Emission Factors AP-42, Volume I: Stationary Point and Area Sources*, Chapter 13.2.1, "Paved Roads," updated January 2011.

SOURCE: Ricondo & Associates, Inc., November 2012, based on output from the Federal Aviation Administration's Emissions and Dispersion Modeling System, Version 5.1.3.

PREPARED BY: Ricondo & Associates, Inc., November 2012.

Table G-2 presents emissions estimates for on-road construction equipment for the Proposed Action.

Table G-2 On-Road Construction Equipment Emissions

			EMISSIONS (TONS PER YEAR)					
	ROUNDTRIPS PER YEAR	VMT [1/]	CO	VOC	NO_X	SO_X	PM_{10} [2/]	$PM_{2.5}$
2014								
Hauling trips/material deliveries	8,475	338,986	2.154	0.188	0.278	0.003	0.161	0.007
Employee vehicle trips	22,737	454,737	2.890	0.253	0.373	0.004	0.217	0.009
Total			**5.044**	**0.441**	**0.651**	**0.008**	**0.378**	**0.016**
2015								
Hauling trips/material deliveries	3,677	147,065	0.906	0.077	0.110	0.001	0.070	0.003
Employee vehicle trips	11,012	220,233	1.357	0.116	0.164	0.002	0.105	0.004
Total			**2.262**	**0.193**	**0.274**	**0.004**	**0.174**	**0.007**

Notes:

Columns may not add to totals shown because of rounding.

1/ Vehicle miles traveled is calculated by multiplying the total number of vehicle trips by the trip distance. The average trip length for construction employees is assumed to be 10 miles (20 miles roundtrip). The trip length for hauling and material deliveries is assumed to be 25 miles (50 miles roundtrip).

2/ PM_{10} emissions include entrained road dust.

SOURCE: Ricondo & Associates, Inc., November 2012, based on information provided by Bechtel Infrastructure Corporation and ECM International, Inc.

PREPARED BY: Ricondo & Associates, Inc., November 2012.

G.3.2 NONROAD CONSTRUCTION EQUIPMENT

Nonroad construction equipment includes bulldozers, loaders, sweepers, and other heavy-duty construction equipment that generally does not travel on roadways. Emissions for nonroad vehicles equipped with diesel-powered engines are regulated under 40 CFR Part 89.112,[5] *Oxides of nitrogen, carbon monoxide, hydrocarbon, and particulate matter exhaust emission standards*. Emission factors associated with diesel engines vary by engine year and horsepower according to Tier 1, Tier 2, Tier 3, and Tier 4 emissions standards, as presented in Table 1 of the U.S. EPA report NR-009c, *Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling – Compression-Ignition*.[6] Nonroad construction equipment emissions under the Proposed Action were calculated based on the engine horsepower, hours of equipment use, load factor, and the average age of the equipment. The EPA recommends the methodology shown in **Equation G-1** for calculating emissions from nonroad construction equipment.

Equation G-1 Nonroad Construction Equipment Emissions Calculation Equation

$$M_i = (N)(HRS)(HP)(LF/100)(EF_i)$$

where:

- M_i = mass of emissions of i^{th} pollutants during the inventory period;
- N = source population (units);
- HRS = annual hours of use;
- HP = average rated horsepower;
- LF = typical load factor;
- EFi = average emissions of i^{th} pollutant per unit of use (e.g., pounds per horsepower-hour).

SOURCE: U.S. Environmental Protection Agency. *Nonroad Engine and Vehicle Emission Study—Report*, November 1991.
PREPARED BY: Ricondo & Associates, Inc., November 2012.

Emission factors associated with diesel engines vary by the year the engine was manufactured and by horsepower. The fleet age of the diesel equipment that would be used for construction of the Proposed Action was estimated to range over 8 years (e.g., for the 2014 construction year, it was assumed that the oldest piece of equipment on-site would have been manufactured in 2007). Through the use of the vehicle age spread, a weighted average of Tier 1, Tier 2, Tier 3, and Tier 4 emissions standards was developed for each equipment type and horsepower range. This methodology is the most representative approach for calculating pollutant emissions for nonroad construction equipment equipped with diesel engines. In

[5] U.S. Environmental Protection Agency, *Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines, Oxides of nitrogen, carbon monoxide, hydrocarbon, and particulate matter exhaust emission standards.* 40 CFR Part 89.112.

[6] U.S. Environmental Protection Agency, Office of Mobile Sources, *Exhaust Emission Factors for Nonroad Engine Modeling – Compression-Ignition*, Report No. NR-009c, April 2004.

addition to exhaust emissions of PM_{10}, fugitive dust emissions were also estimated for nonroad construction equipment. Fugitive dust during construction occurs during earthmoving activities such as excavating, grading, dumping, loading, or pushing dirt.

The data used to estimate emissions from nonroad construction equipment in 2014 and 2015, as well as total emissions by equipment type, are presented in **Table G-3** and **Table G-4**, respectively.

Table G-3 Nonroad Construction Equipment Emissions – 2014

					EMISSION FACTORS (POUNDS PER HORSEPOWER-HOUR) [1/]							EMISSIONS (TONS PER YEAR) [2/]					
EQUIPMENT	FUEL	LOAD FACTOR [3/]	HORSEPOWER	HOURS	CO	VOC	NO_X	SO_X	PM_{10}	FUGITIVE	CONVERSION FACTOR [4/]	CO	VOC	NO_X	SO_X	PM_{10} [5/]	$PM_{2.5}$ [6/]
Air Compressor	Diesel	0.43	80	1,461	0.0013	0.0004	0.0049	0.0000	0.0003	0.0000	0.0005	0.032	0.009	0.123	0.001	0.008	0.008
Asphalt Paver	Diesel	0.59	200	36	0.0010	0.0003	0.0049	0.0000	0.0002	0.1443	0.0005	0.002	0.001	0.011	0.000	0.003	0.000
Backhoe	Diesel	0.21	124	33	0.0009	0.0003	0.0049	0.0000	0.0002	0.1465	0.0005	0.000	0.000	0.002	0.000	0.002	0.000
Bulldozer	Diesel	0.59	405	310	0.0016	0.0003	0.0049	0.0000	0.0002	0.1443	0.0005	0.060	0.012	0.181	0.001	0.029	0.006
Compactor	Diesel	0.55	145	91	0.0009	0.0003	0.0049	0.0000	0.0002	0.1443	0.0005	0.003	0.001	0.018	0.000	0.007	0.001
Concrete Drill	Diesel	0.59	30	24	0.0040	0.0004	0.0071	0.0000	0.0004	0.0000	0.0005	0.001	0.000	0.002	0.000	0.000	0.000
Concrete Pump Truck with Boom	Diesel	0.59	460	1,457	0.0016	0.0003	0.0049	0.0000	0.0002	0.1443	0.0005	0.318	0.065	0.969	0.005	0.140	0.035
Crane	Diesel	0.43	200	2,191	0.0010	0.0003	0.0049	0.0000	0.0002	0.1443	0.0005	0.096	0.031	0.462	0.002	0.175	0.017
Excavator	Diesel	0.59	222	2,441	0.0010	0.0003	0.0049	0.0000	0.0002	0.0435	0.0005	0.163	0.053	0.783	0.004	0.081	0.028
Fork Lift	Diesel	0.21	80	1,461	0.0013	0.0004	0.0049	0.0000	0.0003	0.1443	0.0005	0.016	0.004	0.060	0.000	0.109	0.004
Generator	Diesel	0.43	749	6,309	0.0009	0.0005	0.0072	0.0000	0.0002	0.0000	0.0005	0.941	0.502	7.271	0.024	0.225	0.225
Loader	Diesel	0.21	220	1,728	0.0010	0.0003	0.0049	0.0000	0.0002	0.2198	0.0005	0.041	0.013	0.196	0.001	0.197	0.007
Motor Grader	Diesel	0.59	215	342	0.0010	0.0003	0.0049	0.0000	0.0002	0.9076	0.0005	0.022	0.007	0.106	0.001	0.159	0.004
Scissor Lift	Diesel	0.21	30	2,522	0.0040	0.0004	0.0071	0.0000	0.0004	0.0000	0.0005	0.032	0.003	0.056	0.000	0.003	0.003
Sheep's Foot Compactor	Diesel	0.62	100	33	0.0013	0.0004	0.0049	0.0000	0.0003	0.1443	0.0005	0.001	0.000	0.005	0.000	0.003	0.000
Transit Mixer Truck	Diesel	0.43	430	2,390	0.0016	0.0003	0.0049	0.0000	0.0002	2.2298	0.0005	0.356	0.073	1.083	0.005	2.704	0.039
Water Truck	Diesel	0.59	870	4,135	0.0009	0.0005	0.0072	0.0000	0.0002	0.1494	0.0005	0.983	0.525	7.596	0.025	0.543	0.235
Total												**3.068**	**1.300**	**18.923**	**0.069**	**4.388**	**0.611**

Notes:

Columns may not add to totals shown because of rounding.

1/ Emission factors were derived from Tier standards and an 8-year spread for construction equipment was used to create a weighted average emission factor.

2/ Vehicle emissions are calculated by multiplying the annual hours, load factor, horsepower, emission factor, usage factor, and conversion factor to create a value of tons per year for each piece of equipment.

3/ Load factor is defined as the average fraction of rated power (horsepower) used in a duty cycle.

4/ The conversion factor is the number of pounds per ton – 1 ton/ 2,000 pounds = 0.0005.

5/ PM_{10} emissions include fugitive dust.

6/ For nonroad construction equipment, $PM_{2.5}$ emissions were assumed to be equal to PM_{10} emissions but do not include fugitive dust.

Source: Ricondo & Associates, Inc., November 2012, based on information provided by Bechtel Infrastructure Corporation and ECM International, Inc.
PREPARED BY: Ricondo & Associates, Inc., November 2012.

Table G-4 Nonroad Construction Equipment Emissions – 2015

					EMISSION FACTORS (POUNDS PER HORSEPOWER-HOUR) [1/]							EMISSIONS (TONS PER YEAR) [2/]					
EQUIPMENT	FUEL	LOAD FACTOR [3/]	HORSEPOWER	HOURS	CO	VOC	NO_X	SO_X	PM_{10}	FUGITIVE	CONVERSION FACTOR [4/]	CO	VOC	NO_X	SO_X	PM_{10} [5/]	$PM_{2.5}$ [6/]
Air Compressor	Diesel	0.43	80	730	0.0011	0.0003	0.0043	0.0000	0.0003	0.0000	0.0005	0.013	0.004	0.054	0.000	0.003	0.003
Asphalt Paver	Diesel	0.59	200	18	0.0008	0.0003	0.0043	0.0000	0.0001	0.1443	0.0005	0.001	0.000	0.005	0.000	0.001	0.000
Backhoe	Diesel	0.21	124	0	0.0007	0.0003	0.0043	0.0000	0.0001	0.1465	0.0005	0.000	0.000	0.000	0.000	0.000	0.000
Bulldozer	Diesel	0.59	405	155	0.0013	0.0003	0.0043	0.0000	0.0001	0.1443	0.0005	0.024	0.006	0.079	0.000	0.014	0.003
Compactor	Diesel	0.55	145	46	0.0007	0.0003	0.0043	0.0000	0.0001	0.0000	0.0005	0.001	0.001	0.008	0.000	0.000	0.000
Concrete Drill	Diesel	0.59	30	0	0.0035	0.0004	0.0066	0.0000	0.0003	0.0000	0.0005	0.000	0.000	0.000	0.000	0.000	0.000
Concrete Pump Truck with Boom	Diesel	0.59	460	728	0.0013	0.0003	0.0043	0.0000	0.0001	0.0000	0.0005	0.127	0.032	0.424	0.002	0.014	0.014
Crane	Diesel	0.43	200	1,095	0.0008	0.0003	0.0043	0.0000	0.0001	0.1443	0.0005	0.038	0.015	0.202	0.001	0.085	0.006
Excavator	Diesel	0.59	222	109	0.0008	0.0003	0.0043	0.0000	0.0001	0.0435	0.0005	0.006	0.002	0.031	0.000	0.003	0.001
Fork Lift	Diesel	0.21	80	730	0.0011	0.0003	0.0043	0.0000	0.0003	0.1443	0.0005	0.006	0.002	0.026	0.000	0.054	0.002
Generator	Diesel	0.43	749	3,154	0.0007	0.0005	0.0062	0.0000	0.0002	0.0000	0.0005	0.374	0.246	3.126	0.012	0.096	0.096
Loader	Diesel	0.21	220	840	0.0008	0.0003	0.0043	0.0000	0.0001	0.2198	0.0005	0.016	0.006	0.083	0.000	0.095	0.003
Motor Grader	Diesel	0.59	215	155	0.0008	0.0003	0.0043	0.0000	0.0001	0.0000	0.0005	0.008	0.003	0.042	0.000	0.001	0.001
Scissor Lift	Diesel	0.21	30	1,253	0.0035	0.0004	0.0066	0.0000	0.0003	0.0000	0.0005	0.014	0.001	0.026	0.000	0.001	0.001
Sheep's Foot Compactor	Diesel	0.62	100	0	0.0011	0.0003	0.0043	0.0000	0.0003	0.1443	0.0005	0.000	0.000	0.000	0.000	0.000	0.000
Transit Mixer Truck	Diesel	0.43	430	1,195	0.0013	0.0003	0.0043	0.0000	0.0001	0.0000	0.0005	0.142	0.035	0.474	0.003	0.015	0.015
Water Truck	Diesel	0.59	870	2,047	0.0007	0.0005	0.0062	0.0000	0.0002	0.1494	0.0005	0.387	0.255	3.233	0.012	0.253	0.100
Total												**1.156**	**0.609**	**7.812**	**0.032**	**0.637**	**0.245**

Notes:

Columns may not add to totals shown because of rounding.

1/ Emission factors were derived from Tier standards and an 8-year spread for construction equipment was used to create a weighted average emission factor.

2/ Vehicle emissions are calculated by multiplying the annual hours, load factor, horsepower, emission factor, usage factor, and conversion factor to create a value of tons per year for each piece of equipment.

3/ Load factor is defined as the average fraction of rated power (horsepower) used in a duty cycle.

4/ The conversion factor is the number of pounds per ton – 1 ton/ 2,000 pounds = 0.0005.

5/ PM_{10} emissions include fugitive dust.

6/ For nonroad construction equipment, $PM_{2.5}$ emissions were assumed to be equal to PM_{10} emissions but do not include fugitive dust.

Source: Ricondo & Associates, Inc., November 2012, based on information provided by Bechtel Infrastructure Corporation and ECM International, Inc.
PREPARED BY: Ricondo & Associates, Inc., November 2012.

G.3.3 SUMMARY OF CONSTRUCTION EMISSIONS ANALYSIS

A summary of total construction-related emissions for the Proposed Action in 2014 and 2015 is presented in **Table G-5**.

Table G-5 Construction Emissions Summary

SOURCE BY YEAR	CO	VOC	NO_X	SO_X	PM_{10}	$PM_{2.5}$
2014						
On-Road Equipment	5.044	0.441	0.651	0.008	0.378	0.016
Nonroad Equipment	3.068	1.300	18.923	0.069	4.388	0.611
Total	**8.112**	**1.741**	**19.574**	**0.077**	**4.765**	**0.627**
2015						
On-Road Equipment	2.262	0.193	0.274	0.004	0.174	0.007
Nonroad Equipment	1.156	0.609	7.812	0.032	0.637	0.245
Total	**3.419**	**0.802**	**8.086**	**0.036**	**0.811**	**0.252**

Note:

Columns may not add to totals shown because of rounding.

SOURCE: Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., November 2012.

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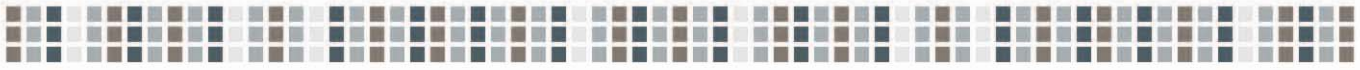
Appendix H

Biological Assessment



Kahului Airport

Biological Assessment Proposed Consolidated Rental Car Facility & Airport Access Road, Phase II

PREPARED FOR:

Hawaii Department of Transportation, Airports Division

November 16, 2012
DRAFT

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1. Introduction

1.1 Species Considered

The purpose of this Biological Assessment (BA) is to review and analyze the proposed construction and operation of a consolidated rental car facility (ConRAC) and Phase II of the Airport Access Road[1] at Kahului Airport (OGG or Airport) in sufficient detail to determine the extent to which the proposed projects may affect federally threatened or endangered species and designated or proposed critical habitats protected under the Endangered Species Act (ESA) of 1973 (see **Exhibit 1-1**). This BA has been prepared for use by the Federal Aviation Administration (FAA) to facilitate any needed consultation with the United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS), pursuant to Section 7 of the ESA. This BA is prepared in accordance with legal requirements set forth under regulations implementing Section 7 of the Endangered Species Act (50 Code of Federal Regulations [CFR] 402; 16 United States Code [U.S.C.] 1536 (c)).

In addition to compliance with provisions of the ESA, Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act[2] (Magnuson-Stevens Act) requires federal agencies to consult with the NMFS regarding any action or proposed action that may adversely affect Essential Fish Habitat for federally managed fish species.

It should be noted that the Airport Access Road was examined and received environmental approval as part of the 1997 Kahului Airport Improvements EIS. The proposed ConRAC facility is a new project being examined by HDOT-Airports Division. Although they are separate projects, because construction of both projects would overlap, they are both considered in this BA to ensure that the potential cumulative impacts on threatened and endangered species are taken into full consideration.

1.1.1 FEDERALLY THREATENED AND ENDANGERED SPECIES

The federally listed species addressed in this BA consists of the Blackburn's sphinx moth (*Manduca blackburni*) and the Hawaiian hoary bat or Ōpe'ape'a (*Lasiurus cinereus semotus*) which are currently listed as Endangered.

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1 Phase I of the Airport Access Road was approved by the Federal Highway Administration after consultation with the U.S. Fish & Wildlife Service in September 2012.

2 Public Law 94-265.

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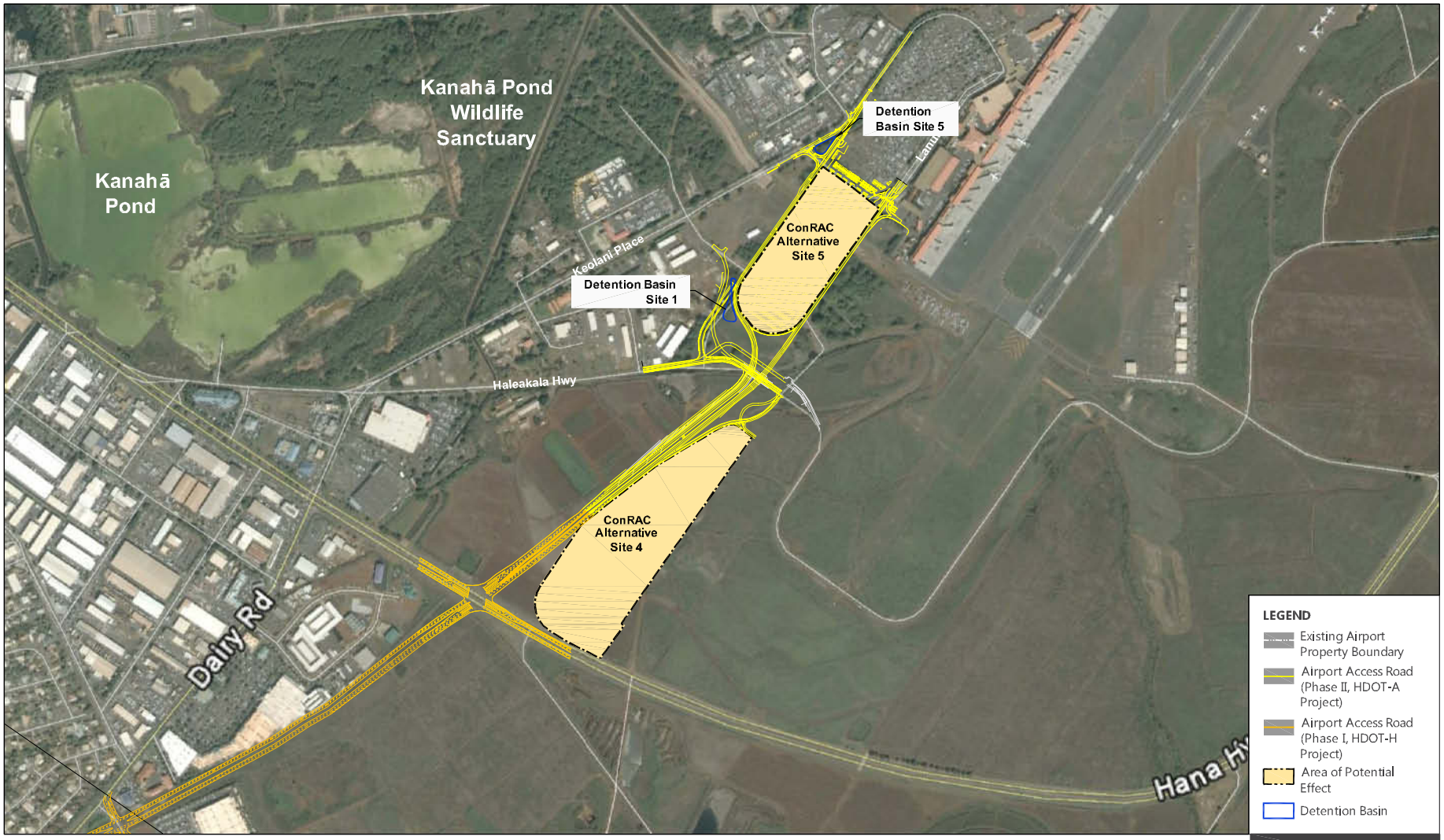
[Preliminary Draft for Discussion Purposes Only]



SOURCES: Google Earth Pro 2010; DigitalGlobe, 2011 (aerial photography); Kim & Shiroma Engineers, Inc., 2009 (roadway improvements & parking expansion); Ricondo & Associates, Inc., November 2012.
PREPARED BY: Ricondo & Associates, Inc., November 2012.

EXHIBIT 1-1

NORTH 0 1,200 ft.

Proposed Projects at Kahului Airport

Drawing: Z:\Hawaii\OGG\OGG Rental Car\CONRAC Site Selection\AutoCAD\Ex 3 Study Area & Preferred Action_08202012.dwg_Layout: BA Ex 1-1_Nov 16, 2012, 1:35pm

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1.1.2 LISTED SPECIES NOT PRESENT

Twenty-one endangered and one threatened plant species occur or historically occurred on the island of Maui. These plants are scattered throughout Maui in diverse ecosystems. These plants are listed in the Maui Plant Cluster Recovery Plan and grow in a variety of vegetation communities (forests, shrub lands, and volcanic cliffs), elevation zones (coastal to high cliff faces), and moisture regimes (dry to wet). Of the 22 Maui plants listed, 12 are endemic to the island. The land that supports these plants is owned by the State of Hawaii, the County of Maui, the federal government, and various private parties. Much of the federal land is part of Haleakala National Park; other federal lands are controlled by the U.S. Army and U.S. Navy.

- Ko`oloa`ula (*Abutilon menziesii*)
- Liliwai (*Acaena exigua*)
- Uhiuhi (*Caesalpinia kavaiensis*)
- Oha wai (*Clermontia peleana ssp. Singuliflora*)
- Haha (*Cyanea mauiensis (listed as Cyanea grimesiana ssp. grimesiana*))
- No common name (*Delissea undulate*)
- Nanu (*Gardenia brighamii*)
- No common name (*Haplostachys haplostachya*)
- No common name (*Hesperomannia arborescens*)
- Wawae`iole (Huperzia mannii)
- Carter's panic grass (Panicum fauriei var. carteri)
- No common name (Phyllostegia parviflora var. parviflora)
- `Iliahi (Santalum freycinetianum var. lanaiense)
- Dwarf naupaka (Scaevola coriacea)
- No common name (Schiedea hookeri)
- No common name (Schiedea nuttallii)
- Popolo ku mai (Solanum incompletum)
- No common name (Stenogyne angustifolia (listed as Stenogyne angustifolia var. angustifolia))
- No common name (Tetramolopium arenarium ssp. arenarium (listed as Tetramolopium arenarium))
- No common name (*Tetramolopium arenarium ssp. laxum (listed as Tetramolopium arenarium*))
- No common name (*Tetramolopium arenarium var. arenarium (listed as Tetramolopium arenarium*))

- Makou (Peucedanum sandwicense) - threatened

These plants and their habitats have been variously affected or are currently threatened by one or more of the following: trampling, predation, and habitat destruction by introduced animals; habitat degradation and competition for space, light, water, and nutrients by naturalized, alien vegetation; habitat loss from fires; alien insects; disease; small number of individuals and populations; and loss of pollinators. Seeds and/or plants of many of these listed plants have been collected and some have been successfully propagated for reintroduction.

Fifty-eight animal species are federally listed as endangered or threatened for the State of Hawaii. As this list is not specific to each Hawaiian Island or county, it has not been included in this section, but links to the list can be found in **Appendix A**. Site specific animal documentation is provided in Section 5.1.

Based on a review of the distribution, ecosystems, and habitat requirements of these species and the ecosystem and habitats potentially available within the action area, no listed species of birds, reptiles, or plants are likely to occur within the project area (see Section 4.3). There are no listed species of fish for Hawaii.

1.2 Blackburn's Sphinx Moth

The Blackburn's sphinx moth has the potential to exist on the ConRAC Alternative Sites 4 and 5 and within the Airport Access Road corridor. No Blackburn's sphinx moth has been observed during the botanical and fauna surveys conducted for these project but several tree tobacco plants (*Nicotiana glauca*), that can host eggs or larvae of the moth, were observed.

DESCRIPTION & DEVELOPMENT

Blackburn's sphinx moth is Hawaii's largest native insect, with a wingspan of up to 5 inches. Like other sphinx moths, it has long, narrow forewings and a thick, spindle-shaped body tapered at both ends. It is grayish brown in color with black bands across the top margins of the hind wings and five orange spots along each side of the abdomen. The large caterpillars occur in two color morphs, gray or bright green with scattered white speckles throughout the back and a horizontal white stripe on the side margin of each segment.

In 56 days, the egg can develop to the adult, but pupae may aestivate (dormancy during a period when conditions are hot and dry) in the soil for as long as several months. Adult moths can be found year round but seem to be most active during two periods, January to April and September to November. Adult moths are known to be strong fliers.

HABITAT

This species has been historically found in coastal, lowland, and dryland forests receiving less than 50 inches of rainfall, at an altitude varying from sea level to 5,000 feet. These types of forests were most common historically on Maui. Larvae of Blackburn's sphinx moth feed on native 'aiea trees (consuming leaves, stems, flowers, and buds) and other plants in the Solanacea family. However, some of the host plants recorded for the species are not native to the Hawaiian Islands, and include tobacco (*Nicotiana tabacum*), tree tobacco (*Nicotiana glauca*), eggplant (*Solanum melongena*), tomato (*Lycopersicon esculentum*), and possibly, Jimsonweed (*Datura stramonium*).

The native Hawaiian morning glory species, *Ipomoea indica,* is one of the food sources that feed the Blackburn's sphinx moth adults. The Hawaiian native caper (*Capparis sandwichiana*) and wild leadwort (*Plumbago zeylanica*) are also likely to be food sources. All three plant species bear flowers that possess some characters suggestive of moth pollination, including opening at night, pale coloration, or a strong fragrance.[3]

EVOLUTION AND THREAT

The moth was once found on six of the eight Hawaiian Islands but now exists only on Maui, Kaho'olawe, and the island of Hawaii. This species was believed extinct until 1984 when a small population was rediscovered in a lowland dry forest on the south coast of east Maui (Kanaio area). Subsequently, additional small isolated populations have been discovered in other parts of Maui including Kanahā Pond and Spreckelsville. Populations were recently discovered on Kaho'olawe (the first record of this species on this island) in 1997 and in 1998 in North Kona on the island of Hawaii.

Threats to Blackburn's sphinx moths can be placed in two categories: impacts on habitat and direct impacts on moths themselves. Threats include continued loss and degradation of habitat due to urban and agricultural development, introduced ants and parasitic wasps that prey on the eggs and caterpillars, and the loss of its native host plant, 'aiea, which is a dryland forest tree.[4]

The native host plant is found in endangered ecosystems, dry and mesic forests, and has been adversely affected by feral animals, alien plant invasions, and habitat conversions associated with development. Ants are not a natural component of Hawaii's arthropod fauna and they are particularly destructive due to their high densities, aggressiveness, and broad range of diet. A high percentage of the eggs of the sphinx moth are destroyed by alien parasitoid wasps and ants. In addition, the moth may also be susceptible to collection by individuals for their personal collections or for trade. Because

---

[3] The Xerces Society for Invertebrate Conservation, *Moths: Blackburn's sphinx moth*, Accessed Online: http://www.xerces.org/blackburns-sphinx-moth/, Accessed September 2012.

[4] The Xerces Society for Invertebrate Conservation, *Moths: Blackburn's sphinx moth*, Accessed Online: http://www.xerces.org/blackburns-sphinx-moth/, Accessed September 2012.

the remaining populations are small and restricted, the potential for extinction from a chance event, such as fire or hurricane, is greatly increased.

CONSERVATION EFFORTS

This native Hawaiian moth was the first Hawaiian insect to be added to the endangered species list by the U.S. Fish and Wildlife Service. The principal conservation need for this species is protection of habitat. The U.S. Fish and Wildlife Service is currently a partner in a dry forest restoration project on State lands in the same area where the North Kona population of the moth occurs.

The Kanahā Pond Wildlife Sanctuary dune restoration project is currently being modified to include planting of the native host plant since sphinx moth larvae were recently observed on plants in the sand dune area of the sanctuary. The military uses part of the general area where the east Maui population occurs for training and has adopted measures to prevent fires, alien seed dispersal, and vegetation damage as a result of training. While no conservation efforts specifically for the moth are currently underway on Kahoʻolawe, the State of Hawaii, the Kahoʻolawe Island Reserve Commission, and the U.S. Navy are aware of the presence of this species and have sponsored surveys to identify the distribution of the moth on the accessible parts of the island.

The U.S. Fish and Wildlife Service is currently funding research examining the life history, captive rearing, and conservation biology of Blackburn's sphinx moth.

1.3 Hawaiian Hoary Bat

The U.S. Fish and Wildlife Service has developed a recovery plan for the Hawaiian hoary bat. This document provides descriptions of the bat along with a recovery plan and recovery status criteria.[5]

DESCRIPTION & DEVELOPMENT

According to the USFWS Recovery Plan document:

> The Hawaiian hoary bat is a medium-sized (0.5-0.8 ounces), nocturnal, insectivorous bat. Hoary bats are heavily furred and possess a hair color that is a mixture of brown and gray tinged with white, producing a frosted or 'hoary' appearance. Hoary bat ears are short, thick and rounded, and edged with black. The Hawaiian hoary bat may be somewhat more red in color than the North American subspecies (Tomich 1986c).

[5] U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

> The Hawaiian hoary bat belongs to the suborder Microchiroptera, which includes all bats except Old World fruit bats. The Hawaiian hoary bat is one of three recognized hoary bat subspecies; *Lasiurus cinereus cinereus* occurs throughout North America, and *Lasiurus cinereus vilosissimus* occurs in South America (Hall 1981). The Hawaiian hoary bat is endemic to the Hawaiian Islands and is thought to be derived from the North American hoary bat (Morales and Bickham 1995).[6]

HABITAT

Research for the Recovery Plan document is inconclusive as to dominant habitat traits for this species. Known habitat information from the Recovery Plan is provided below:

> Whether native vegetation is required by, or is important to, Hawaiian hoary bats is not known. Kepler and Scott (1990) found that bats were most frequently observed in association with nonnative vegetation, with relatively few occurring in native vegetation. In contrast, Fullard (1989) stated that the only two locations on Kauai where bats were consistently observed were near native forests and that he rarely found them in towns or over open fields. He concluded that, on Kauai, the Hawaiian hoary bat was uncommon and was found primarily in open wet areas near forests and only occasionally in drier areas. Fullard (1989) also commonly detected bats on Kauai at ocean outlets of forested rivers.
>
> Similarly, Jacobs (1994) found that Hawaiian hoary bats on Hawaii are more frequently associated with native vegetation, and native ohia trees (*Meterosideros polymorpha*) were used frequently by two radio-tagged bats on Hawaii (Jacobs 1993a). Reynolds, et al (1997/1998) found no significant difference in the number of bats detected in native, mixed, or alien forest types in the Puna district on Hawaii. Roosting has been documented in numerous tree species, including hala (*Pandanus tectorius*), kukui (*Aleurites moluccana*), pukiawe (*Styphelia tameiameiae*), and Java plum (*Syzygium cumini*) (Baldwin 1950, Bryan 1955, Kramer 1971).
>
> Tomich (1986c) stated "The [Hawaiian] hoary bat is highly unselective in the kind of tree it chooses for roosting" and suggests that the replacement of native trees with introduced species may not present a significant hazard to bat populations. He further argued that in lowland areas that have been deforested enough "tree cover and wild gulch habitat [exists] to provide adequate shelter." Tomich (1986b) presented no data to support his contention that Hawaiian hoary bats are not selective in choosing roost sites, but he did

[6] U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

acknowledge that the effect on the Hawaiian hoary bat from the significant deforestation that has occurred on the Hawaiian Islands is unknown.[7]

EVOLUTION AND THREAT

The Recovery Plan does not identify any one direct threat to the bat population; rather a number of threats may play a role in the bat population decline, as documented in the Recovery Plan:

> Since no accurate population estimates exist for this subspecies and because historical information regarding its past distribution is scant, the decline of the bat has been largely inferred. Tomich (1986a), for example, suggests that if bat numbers have decreased significantly on Oahu, it may be due to deforestation that occurred in the early nineteenth century, but he also states that there is little information available beyond the currently known distribution of the bat on the Hawaiian Islands. Observations and specimen records do suggest that bats are now absent from historically occupied range, but estimates of abundance in formerly occupied areas are lacking. The magnitude of any population decline is not known.
>
> Bat populations can be threatened by habitat loss, pesticides, predation, and roost disturbance (Bat Conservation International 1991). In general, availability of roosting sites rather than food availability, predation, or other factors is believed to be the primary limitation in the distribution and abundance of many bat species (Fenton 1970, Fenton and Barclay 1980, Humphrey 1975, Kunz 1982). The decline of the Hawaiian hoary bat may be due primarily to the reduction of tree cover in historic times (Tomich 1986b, Nowak 1994).
>
> Pesticide use, alone or in combination with the factors discussed above, may have had an indirect impact via reducing or otherwise altering prey populations. Direct effects from contamination could also be a factor: at least two federally endangered insectivorous bat species have suffered mortality due to pesticide ingestion (Clark et al, 1978). The introduction of nonnative insects could also have altered prey availability. Predation is not believed to be a significant threat to the mainland populations (Shump and Shump 1982), but could be a more significant factor for the Hawaiian subspecies. Ultimately, however, there is no available data that bears directly on the question of a population decline.[8]

---

[7] U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

[8] U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

CONSERVATION EFFORTS

As of publication of the Recovery Plan document, much research was still needed in order to develop recovery and population management methodology:

> Research is the key to reaching the ultimate goal of delisting the Hawaiian hoary bat because currently available information is so limited that even the most basic management actions cannot be undertaken with the certainty that such actions will benefit the subspecies. The initial focus for developing standardized survey and monitoring techniques and collecting basic life history information will be on Hawaiian hoary bat populations on the island of Hawaii, which apparently has the largest population of Hawaiian hoary bats. As survey and monitoring techniques are developed for Hawaiian hoary bats on Hawaii, the techniques can be applied to bat populations on Kauai, Maui, and to the other islands to determine bat abundance and distribution and to monitor population changes over time. Completion of research tasks will not only establish the distribution and abundance of Hawaiian hoary bats, but will also provide information on specific roosting habitat associations and food habits.
>
> With basic information on the location of Hawaiian hoary bats and their resource needs, threats can then be identified and managed. Management actions that may be needed to address threats include protection of key roosting and foraging areas, particularly if Hawaiian hoary bats or their food resources depend on native vegetation. Predation, the potential impacts of pesticides to bats or their food resources, and other threats may also need to be addressed.
>
> Additional tasks will include the development of educational programs to inform the public about the biology of Hawaiian hoary bats, their value to Hawaiian ecosystems, and recovery efforts. As the results of research and management are evaluated, the progress of recovery of Hawaiian hoary bats can be assessed, and more definitive downlisting and delisting criteria can be developed.[9]

[9] U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

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2. Critical Habitat

2.1 Blackburn's Sphinx Moth Critical Habitat

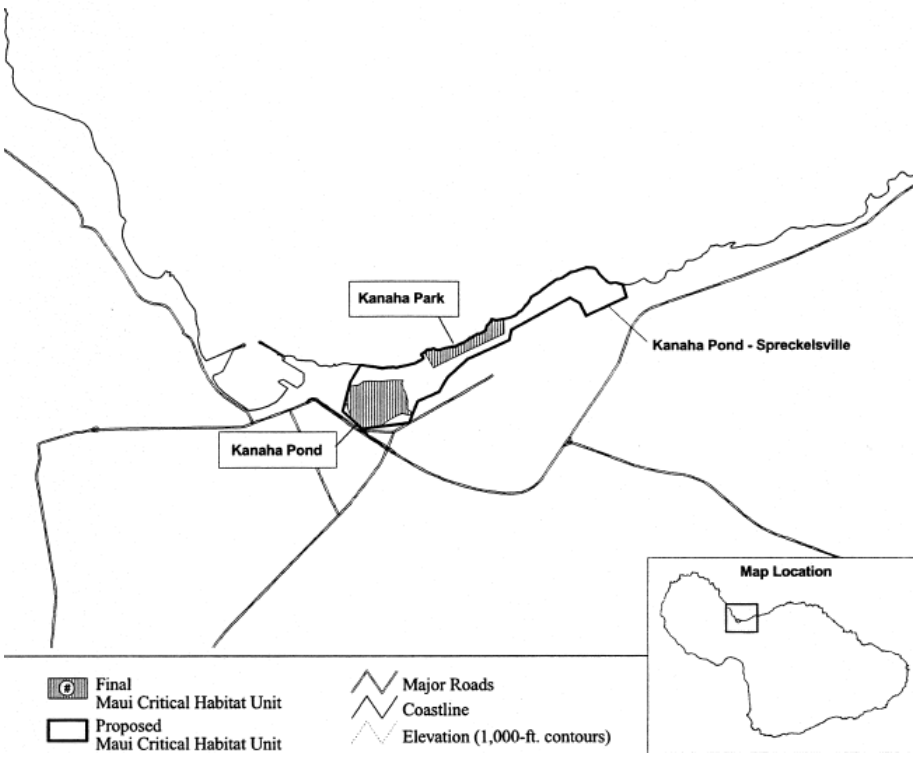
In 2003, 55,451 acres at nine sites were designated as critical habitat for the Blackburn's sphinx moths by the USFWS on the islands of Hawaii, Maui, Molokai, and Kahoolawe. Among the nine sites, six are on the island of Maui and two are close to the Airport. As shown on **Exhibit 2-1**, these are the Kanahā Pond and the Kanahā Pond Wildlife Sanctuary.[10] As a result, there are no defined critical habitat areas for the Blackburn's sphinx moths within the alternative sites for the proposed ConRAC facility or for the proposed Airport Access Road.

2.2 Hawaiian Hoary Bat Critical Habitat

Hawaiian hoary bats have been found roosting in 'ōhi'a (*Metrosideros polymorpha*), puhala (*Pandanus tectorius*), coconut palms (*Cocos nucifera*), kukui (*Aleurites moluccana*), kiawe (*Proscopis pallida*), avocado (*Persea americana*), shower trees (*Cassie javanica*), pūkiawe (*Styphelia tameiameiae*), and fern clumps; they are suspected to roost in Eucalyptus (*Eucalyptus spp.*) and Sugi pine (*Cyrptomeria japonica*) stands. Recent work on the island of Hawaii found that bat activity varied with season and altitude, and the greatest level of activity occurred at low elevations (below 1,280 meters or 4,200 feet) from April to December. Because warm temperatures are strongly associated with reproductive success in this and other bat species, it has been suggested that key breeding habitat is likely to occur at sites where the average July minimum temperature is above 11°C (52°F). If true, key breeding habitat on the island of Hawaii would occur below 1,280 meters (4,200 feet) elevation. Because bats use both native and non-native habitat for foraging and roosting, the importance of non-native timber stands, particularly those at low elevations, should be determined.

[10] 50 CRF Part 17, *Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the Blackburn's Sphinx Moth*, Fish and Wildlife Service, Vol. 68, No. 111, June 10, 2003, http://www.gpo.gov/fdsys/pkg/FR-2003-06-10/pdf/03-14144.pdf#page=1.

Exhibit 2-1 Blackburn's Sphinx Moths' Critical Habitat Sites in the Airport Vicinity



Source: 50 CRF Part 17, Endangered and Threatened Wildlife and Plants; *Designation of Critical Habitat for the Blackburn's Sphinx Moth*, Figure 1, Fish and Wildlife Service, Vol. 68, No. 111, June 10, 2003.

Prepared by: Ricondo & Associates, Inc., November 2012.

Breeding sites are known for Mānuka Natural Area Reserve and scattered areas along the Hāmākua Coast.[11]

According to the USFWS Critical Habitat online mapping tools, no critical habitat for the Hawaiian hoary bat exists on the island of Maui.[12] While the USFWS online Critical Habitat data does not represent all designated Critical Habitat, it is unlikely that designated Critical Habitat for the Hawaiian hoary bat is present at the project location. As discussed in Section 1.3, according to the USFWS Recovery Plan, the Hawaiian hoary bat is unselective in tree species for roosting and not selective in choosing roosting sites. Habitat for the Hawaiian hoary bat is not specific to any habitat existing at the project location. Additionally, the Recovery Plan document noted that the Hawaiian hoary bat

11 State of Hawaii, Department of Fish and Wildlife, *Hawaii's Comprehensive Wildlife Conservation Strategy, Terrestrial Mammal, 'Ōpe'ape'a or Hawaiian Hoary Bat (Lasiurus cinereus semotus)*, October 1, 2005.

12 U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

was rarely observed near urban development or over open fields, two distinct characteristics of the proposed project site.[13]

[13] U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

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3. Consultation to Date

Both the proposed ConRAC facility and Phase II of the Airport Access Road are located entirely on OGG property. The Airport is located in an area primarily surrounded by commercial and light industrial development. The Kanahā Pond Wildlife Sanctuary, a 143-acre wildlife preserve, is located on Airport property approximately one quarter of a mile north of the proposed projects. The Kanahā Pond Wildlife Sanctuary is accessible off Amala Road and fronts the ocean near Kahului Harbor. Kanahā Beach Park is situated between Kahului Bay and Spreckelsville Beach and provides visitors with recreational opportunities such as swimming, windsurfing, volleyball, camping, canoeing, and picnicking. The park is located north of the proposed projects beyond Runway 5-23 across Alahao Street.

Neither the proposed ConRAC facility nor Phase II of the Airport Access Road would impact Section 4(f) lands on the Airport. The HDOT-Airports Division would shield and direct all new roadway lighting to minimize intrusion into light-sensitive areas outside the Airport.

The proposed projects are located approximately one-half mile south of the coastline and are situated within Hawaii's designated CZMP area. Additionally, Maui County has identified that a portion of the proposed Airport Access Road is within the County's Special Management Area (SMA), a "belt" circling the island that has been established to ensure it is managed appropriately. The proposed Airport Access Road is not included in the state's Shoreline Setback Area and, therefore, would not impact this area.

The proposed Airport Access Road is consistent with the State's CZMP and SMA; it improves access to and along the coastline, would not impact the shoreline and beach systems, would not affect nearby coastal recreation opportunities, provides improvements to OGG – a vital component of Maui's economy, and is outside of the tsunami and flood hazard areas. The HDOT-Airports Division received a Maui County SMA Permit to construct the Airport Access Road within the SMA on OGG property. The Maui Planning Commission granted the permit for Phase II of the Airport Access Road on February 24, 2009 and extended the permit in 2012. Measures to minimize or mitigate potential adverse effects are not required.

3.1 Current Management Direction

3.1.1 EXISTING PLANS, GOALS, AND POLICIES

In the 1990's, the HDOT developed an Airport master plan for OGG that noted the future development of an Airport Access Road to alleviate congestion on Dairy Road. The construction of the Airport Access Road was identified as Item No. 55 in the *1997 Maui Long Range Transportation Plan* produced by the HDOT.[14] Additionally, the Maui County Council adopted the *Countywide Policy Plan* in March 2010. The proposed Airport Access Road is consistent with the themes and principles of the *Countywide Policy Plan*. The *Draft Maui Island Plan* (MIP) contains goals, policies, and objectives related to the long range planning efforts for the future of the island.[15] Lastly, the proposed project is located within the Wailuku-Kahului Community Plan region.[16] Planning for each region is guided by the respective Community Plans, which are designed to implement the *Maui County General Plan*. The *Wailuku-Kahului Community Plan* was adopted by the County Council in 2002 and includes language supportive of the proposed Airport Access Road.

The *Countywide Policy Plan*, adopted on March 24, 2010, provides broad goals, objectives, policies, and implementing actions that portray the desired direction of the County's future. Furthermore, this *Countywide Policy Plan* provides the policy framework for the development of the *Maui Island Plan* and the nine Community Plans. The *Countywide Policy Plan* is the outgrowth of, and includes the elements of the earlier *General Plans* of 1980 and 1990.[17]

The MIP will establish a pro-active planning process by establishing urban and rural growth areas that indicate where development is intended and will be supported. Growth areas will provide for less costly services, reduced commuting, protection of community character and the preservation of agriculture, open space, and cultural and natural resources. The MIP comprises goals, policies, programs, and actions which are based on an assessment of current and future needs and available resources. Once it has been adopted, the document becomes the principal tool for the County and its citizens to use when evaluating public and private projects and their impacts on land use, the economy, environment, infrastructure, and cultural resources.[18]

The proposed projects align with the *Hawaii Airport Modernization Plan* prepared in March 2006. The goals of the Plan, prepared by the HDOT-Airports Division and the Airlines Committee of Hawaii, are to create a world class airport system, to create efficiencies and effectiveness in operations, and increase levels of satisfaction for State residents and visitors.

---

14 State of Hawaii, Department of Transportation Plan, *Maui Long Range Transportation Plan*, May 1997.

15 County of Maui, *Draft Maui Island Plan*, May, 2010.

16 County of Maui, *Wailuku-Kahului Community Plan*, 2002.

17 County of Maui, *Countywide Policy Plan*, March 24, 2010.

18 County of Maui, *Draft Maui Island Plan*, May, 2010.

The proposed Airport Access Road was analyzed and approved in the Record of Decision (ROD) on the *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii*.[19]

3.1.2 LAND USE

Land use guidelines are set forth by the existing Wailuku-Kahului Community Plan Land Use Map. The proposed projects would be aligned within land designated "AP, Airport." As defined in the *Wailuku-Kahului Community Plan*, lands designated as "Airport" include:

> … all commercial accessory uses and general aviation airports and their accessory uses.[20]

The proposed projects, which are a use accessory to airport operations, is consistent with the *Wailuku-Kahului Community Plan* land use designations.

The location of the proposed projects are within land zoned for "Airport" use by Maui County zoning.[21] The following uses, pursuant to §19.28.010, MCC Permitted Uses, are permitted in lands zoned "Airport":

> Runways, taxiways, cleared safety areas, aircraft parking and loading aprons, terminal buildings, control towers, fire stations, airport maintenance shops and warehouses, landscaped areas, vehicular roads, auto parking lots, service stations, transient auto garages, airport post offices, restaurants and cocktail lounges, soda fountains, flower shops, gift shops, bootblack stands, photo shops, lei stands, newsstands, haberdasheries, drug stores, banks, wireless offices, transient hotels, miscellaneous concessions to serve the traveling public, postal transfer stations and bases of operations for airport ground transportation; and
>
> Aviation fuel storage and dispensing, freight warehouses, refrigeration facilities for handling of perishable air freight, electroplating shops, flying schools, flying clubs, civil air patrol, aircraft charter operations, aircraft sales, aircraft parts sales, aircraft tool distribution, utility relays or distribution, aeronautical radio facilities, facilities for contract maintenance of aircraft component parts, air freight pickup and delivery service, airline catering, u-drive business, tour operators and agencies, cold storage plants, animal or veterinary hospital or kennels, agriculture (other than animal husbandry, poultry and fowl hatcheries), housing for airport personnel, parks, aircraft tire service, aircraft show rooms, bowling alleys, insurance offices, international terminal services, steam bath and massage, trade schools, truck terminals, warehouse storage and loft buildings.

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19 U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii*, September 1997.

20 County of Maui, *Wailuku-Kahului Community Plan*, 2002.

21 County of Maui, Zoning Administration and Enforcement Division, *Maui County Code of Ordinances*, February 2, 2012. Accessed online: http://library.municode.com/index.aspx?clientId=16289, November 9, 2012.

The proposed CONRAC facility would include automobile parking lots for travelers and facilities for car rental operations ("u-drive business"). The ConRAC facility would conform to standards of development as outlined in the Maui County Code. The various components of either of the ConRAC alternatives would not result in a land use that is incompatible with the *Wailuku-Kahului Community Plan* or Maui County zoning. Therefore, neither ConRAC Alternative 4 nor ConRAC Alternative 5 would have an impact in terms of conflict with applicable plans. Chapter 6 of the Draft MIP (May 2010) identifies "constructing a new airport access road" as a planned long-term project at OGG needed to help accommodate current and projected demand.

4. Description of the Proposed Action

The HDOT-Airports Division, as owner and operator of Kahului Airport proposes to construct and operate a consolidated rental car facility that will provide adequate facilities for rental car companies centralized in one location, reduce traffic and congestion on the terminal roadway system and enhance rental car customers' experience. Additionally, to alleviate congestion the HDOT-Airports Division proposes to construct an Airport Access Road from Hana Highway to the Airport passenger terminal. The proposed actions are described below in Section 4.3, and are based on the preferred alternatives from previous studies and the Draft Environmental Assessment for the Consolidated Rental Car Facility.

4.1 Natural Environment

ConRAC Alternative Site 4 is located on the northeast corner of the intersection between Hana Highway and the future Airport Access Road. ConRAC Alternative Site 5 is located southwest of the existing Airport public parking lot. The Phase II Airport Access Road corridor runs from just north of Hana Highway, northeast to the Airport passenger terminals. The Airport is at an elevation of between +10 and +70 feet mean sea level, and is located in a particularly dry area of Maui, receiving approximately 20 inches of rainfall per year. A wetlands survey of the location of the proposed Airport Access Road was conducted as part of the 1997 EIS; surveys of the proposed ConRAC sites were surveyed in 2012. The surveys concluded that no jurisdictional wetlands are located on or immediately adjacent to the location of the proposed projects. Existing wetlands located within the Airport area, excluding those in the KPWS, are small and isolated.[22]

The project area consists mostly of open grassland in the southern portion of the highway corridor. The northern portion, where the corridor splits to form the Lanui Circle at the entrance to the

[22] U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii*, September 1997.

passenger terminals, consists of a variety of grasses, shrubs and trees. Most of the plant species are non-native weeds typical of disturbed and abandoned agricultural lands.[23]

4.2 Built Environment

ConRAC Alternative Sites 4 and 5 and the Airport Access Road corridor are located in an airport-related environment but are primarily on non-developed lands. ConRAC Alternative Site 4 is located on non-developed land but is close to existing roadways. The built environment on ConRAC Alternative Site 5 includes roadways, a temporary United Parcel Service facility, and a few temporary maintenance-related structures. ConRAC Alternative Site 5 is partially covered with asphalt and concrete pavements whereas no pavement is present on ConRAC Alternative Site 4. The two sites are surrounded by highly disturbed areas such as buildings, highways, and roadways. Characteristic vegetation in these developed areas is ornamental non-native landscaping plant species whereas vegetation on ConRAC Sites 4 and 5, and the Airport Access Road corridor consists of predominantly non-native plant species. No structures currently exist within the Airport Access Road corridor.

4.2.1 LOCATION AND EXISTING FACILITIES

The Hawaii State Airports System is operated as a single system by the DOT-Airport Division. The HDOT- Airports Division currently operates and maintains 15 airports located throughout the State, including OGG. Kahului Airport served approximately 5.5 million domestic and international passengers in 2011.[24] The Airport is classified as a medium-hub commercial service airport in the National Plan of Integrated Airport Systems (NPIAS) and it is the primary airport on the island of Maui since it is the only airport serving direct flights from the North American mainland to Maui.

Kahului Airport is located in Maui County, three miles east of downtown Kahului. A general location and vicinity map of OGG is presented on **Exhibit 4-1**.

The Airport has two runways, Runway 2-20 and Runway 5-23. Runway 2-20 is the primary and the longest runway. Kahului Airport has two terminals, a main terminal and a commuter terminal, with 40 gates in total. The Airport is served by seven on-Airport rental car businesses (Alamo, Avis, Budget, DTAG, Enterprise, National, and Hertz), who have outgrown the existing overflow vehicle storage on-Airport facilities. The existing rental car facilities at OGG are located northwest of the passenger terminal area and public parking lots. With the exception of Enterprise Rent-a-Car customers, all customers returning rental cars must circulate through the Airport terminal roadway adding traffic congestion to the on-Airport roadways.

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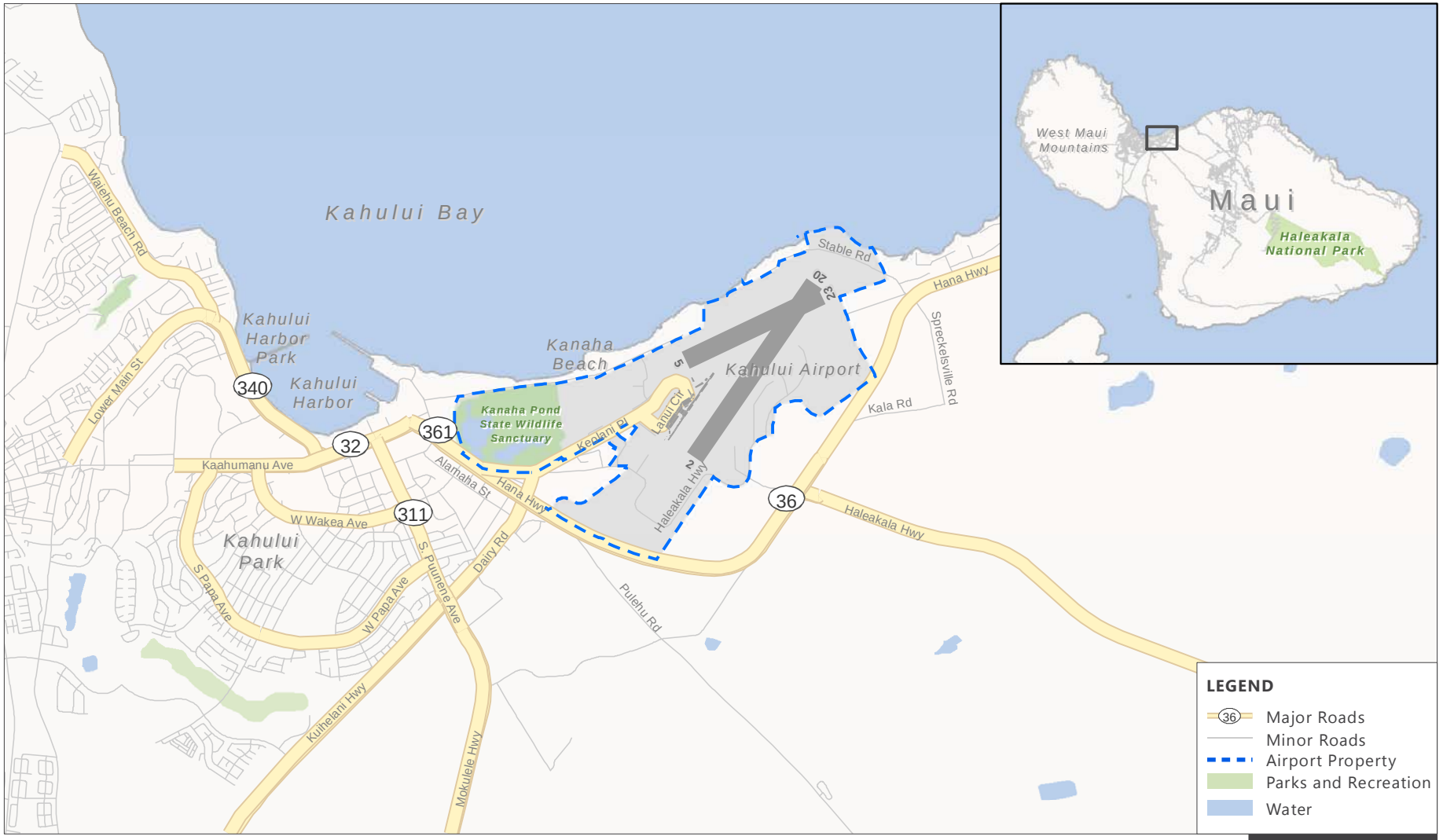
[23] Hobdy, Robert W., *Botanical and Fauna Surveys Kahului Airport Corridor & Detention Basins 1 & 5, Kahului, Maui*, October 2012.

[24] Hawaii Department of Transportation – Airports Division, *Kahului Airport Master Plan Update*, July 2012.

[Preliminary Draft for Discussion Purposes Only]



SOURCE: Environmental Systems Research Institute, 2010 (base map); Maui County Geographic Information Systems Division, Department of Management, 2012 (roads); Department of Transportation, Airports Division, June 2011 (property boundary, terminals, runways).
PREPARED BY: Ricondo & Associates, Inc., November 2012.

NORTH 0 5,000 ft.

EXHIBIT 4-1

Kahului Airport Vicinity

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Vehicle access to OGG is provided by Keolani Place, a four-lane, undivided roadway that connects the Airport to Dairy Road and the Hana and Haleakala highways. Rapid growth experienced on Maui over the last few decades has resulted in an increase in the number of passengers utilizing OGG and the development of vacant lands near the Airport. As a consequence, traffic along Keolani Place and in the vicinity of OGG has increased and is projected to increase further.

4.3 Project Components

The projects proposed by HDOT-A for implementation at OGG encompasses three major components:

1) The construction of a consolidated rental car facility. Alternative Sites 4 and 5 were identified as feasible alternatives for the proposed ConRAC facility; Alternative Site 5 is the Sponsor's preferred alternative. The proposed ConRAC would include a customer service building, a ready/return structure and a quick turnaround area to meet the Airport's rental car program area requirements.
2) The relocation of existing rental car companies and the operation of this facility. Rental car operations would be relocated to the chosen alternative site and the existing rental car company facilities would continue to be used as baseyards for heavy maintenance, additional administrative offices, and overflow parking for rental car vehicles.
3) The construction of Phase II of the Airport Access Road would provide Airport access from Hana Highway via a new roadway, approximately 5,100 feet in length. This roadway would alleviate traffic congestion and provide access to the passenger terminals. The Airport Access Road would intersect with Hana Highway and connect to Phase I of the Airport Access Road, a separate project conducted by HDOT-Highways Division.

4.3.1 DESCRIPTION OF THE ACTION AREA

4.3.1.1 Generalities

For the purposes of this BA, the action area was defined by analyzing the potential extent of effects of the proposed projects in the context of the existing Airport land use, habitat suitability/boundary considerations, and species sensitivity. The action area analysis focuses on undeveloped land or open waters. The action area consists of either one of the two ConRAC alternative sites and the Airport Access Road corridor from just north of Hana Highway to the Airport passenger terminals.

Two alternative ConRAC sites are being evaluated in the Kahului Airport Consolidated Rental Car EA. They are the ConRAC Alternative Site 4 and ConRAC Alternative Site 5. Between these two alternatives, ConRAC Alternative Site 5 is the Sponsor's preferred location.

ConRAC Alternative Site 4 consists of just over 27 acres and is located at the northeast corner of the intersection of Hana Highway and the future Airport Access Road (see Exhibit 1-1). Alternative Site 4 is located outside of the SMA, designated tsunami evacuation area, and FEMA-designated 100-year

floodplain. Busing operations would ensure the transfer of passengers between the terminal building and the rental car facility.

ConRAC Alternative Site 5 consists of approximately 17 acres and is located southwest of the existing Airport public parking lot (see Exhibit 1-1), and had been previously designated for public parking expansion in the 1997 EIS.[25] ConRAC Alternative Site 5 is located within the current SMA and FEMA designated 100-year floodplain. The two main advantages of ConRAC Alternative Site 5 are as follow:

- The proximity of the proposed customer service building to the passenger terminal building allows the installation of an electric trolley that would circulate between the two facilities. Busing operations would be eliminated and passenger convenience would be increased.
- Exiting and returning rental cars would not be required to circulate through the terminal roadways, which would reduce traffic congestion on the Airport terminal curbs.

Construction of the proposed Airport Access Road would involve two different jurisdictions; therefore the project has been separated into two roadway segments and two corresponding phases. The 4,700 linear-foot segment southwest of Hana Highway (Phase I) from the intersection of Puunene Avenue and Kuihelani Highway to Hana Highway is the responsibility of the HDOT-Highways Division. The Phase I segment includes the construction associated with the intersection of Hana Highway and the OGG Airport Access Road. The segment northeast of Hana Highway (Phase II) from just north of Hana Highway to the Airport passenger terminals is the responsibility of the HDOT-Airports Division and the portion of the project analyzed in this report. The proposed Airport Access Road would serve as a four lane arterial roadway with two 12-foot wide lanes and a 10-foot wide shoulder in each direction. The four lane configuration was developed as part of the OGG Master Plan process. The Airport Access Road project area and location is illustrated in Exhibit 1-1.

Each roadway segment/phase required a separate environmental review process. The HDOT-Highways Division documented the anticipated impacts of the construction of the Phase I segment in an EA; the EA was approved by the Federal Highway Administration in September 2012. Phase II of the Airport Access Road is being separately designed and administered by the HDOT-Airports Division.

The potential effects of Phase II of the Airport Access Road on threatened and endangered species are evaluated in this BA since they were not covered in the scope of the EA prepared by the HDOT-Highways Division for Phase I. Coordination between the Highways Division and Airports Division is ongoing to ensure that the basis of design and construction scheduling are aligned.

[25] U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation, Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements, Kahului, Maui, Hawaii, September 1997*.

4.3.1.2 Water Resources

The ocean waters offshore from the Airport are classified as Class A - Open Coastal Waters by the Hawaii Department of Health. The Airport is at an elevation of between +10 and +70 feet mean sea level and is underlain by a thin saline brackish water lens. There are no potable water supplies found within the Airport area. Potable water supplies are found at higher elevations, as they are on all the Hawaiian Islands. The Airport does not overlay any of the drinking water aquifers on Maui and is below the Underground Injection Control line, a program that serves to protect the quality of Hawaii's underground sources of drinking water from chemical, physical, radioactive, and biological contamination that could originate from injection well activity.

Airport drainage is presently accommodated primarily by natural percolation and sheet runoff into Kalialinui Stream and adjacent to agricultural lands. Drainage from the eastern side of the Airport is directed towards low areas behind the coastal dunes and percolates into the ground. There are no drainage outlets from the Airport to the shoreline east of Kalialinui Stream. Airport drainage is isolated from Kanahā Pond by Kalialinui Stream and the A&B Ditch. Non-Airport lands to the west of Kanahā Pond drain into Kanahā Pond.

Kalialinui Stream is the only ocean outlet for storm water originating on the Airport as well as for extensive agricultural activities south and west of the Airport. Flow into Kalialinui Stream is intermittent with little water entering the stream during the dry, summer months. In 1990, Kalialinui Stream flow capacity improvements were increased to reduce the area of the Airport subject to flooding. More recently, the Airport storm water drainage system has been improved to remove storm water from the Airport area more effectively and efficiently.

ConRAC Alternative Site 4 lies on the lower northwest slope of Haleakala volcano on a gently sloping hill about a mile from the ocean and a half mile southwest of Kanahā Pond, a natural wetland on the north side of Maui's isthmus. It lies about a quarter mile to the west of Kalialinui Stream, a shallow ephemeral stream channel that drains into the ocean on Maui's northern coast. The natural drainage from ConRAC Alternative Site 4 is northwesterly toward the Kanahā Pond wetland, but there are no natural flow channels, visible on or near this 27-acre area. ConRAC Alternative Site 4 receives an average of about 20 inches of rainfall annually, and dries quickly following rainfall events due to its sloping terrain, well-drained soil and its exposed, windy location. Because there are no wetlands or any visible stream flow channels, ConRAC Alternative Site 4 is determined to have no jurisdictional Waters of the U.S.

With the exception of some temporary structures, ConRAC Alternative Site 5 lies on undeveloped land. This site is slightly concave in shape with the lowest elevations being situated alongside the Kalialinui Stream channel which passes directly under the site in a buried concrete aqueduct. Kalialinui Stream, which is the only aquatic resource on or near ConRAC Alternative Site 5 was evaluated for its potential to be a Waters of the U.S. The "relevant reach" of Kalialinui Stream for the purpose of this analysis stretches upstream from the "Traditional Navigable Water" (TNW), the Pacific Ocean, for 16,000 lineal feet to just below the Haiku Ditch at 180 feet elevation where the first small unnamed tributary flows into Kalialinui Stream. This stretch of Kalialinui Stream was found to be an

ephemeral stream, a "Non-Relatively Permanent Water" (Non-RPW), without adjacent wetlands. Using a significant Nexus Determination analysis, Kalialinui Stream was found to be a jurisdictional Waters of the U.S.

Phase II of the Airport Access Road also lies primarily on undeveloped land. The access road would stretch approximately 2,700 feet northeast from Hana Highway to intersect with Haleakala Highway. The access road then travels north-northeast approximately an additional 2,400 feet where it merges with Keolani Place. The access road layout passes along the northwest side of ConRAC Alternative Site 4 and creates a loop around ConRAC Alternative Site 5. This site consists of undeveloped and agricultural land with the exception of a few temporary structures. The proposed access road would cross Kalialinui Stream, however at a location where the stream passes under the site in a buried concrete aqueduct.

5. Observed Conditions

To determine the listed species potentially affected by the proposed projects, botanical and fauna surveys were conducted on ConRAC Alternative Sites 4 and 5 and along the Phase II Airport Access Road corridor with the following objectives:

- Document what plant and animal species occur on the property or may likely occur in the existing habitat.
- Document the status and abundance of each species.
- Determine the presence or likely occurrence of any native flora and fauna including fauna and flora federally listed as threatened or endangered. If such occur, identify what features of the habitat may be essential for these species.
- Determine if the project area contains any special habitats which, if lost or altered, might result in a significant negative impact on the flora and fauna in this part of the island.

5.1 Species Accounts

Site surveys were conducted by Robert W. Hobdy, an independent wildlife consultant who has over 37 years of experience with the State of Hawaii Department of Land and Natural Resources. The initial surveys were conducted in June 2012 on ConRAC Alternative Sites 4 and 5. Additional surveys were conducted in October 2012 on the Phase II Airport Access Road corridor and detention basins 1 and 5. The botanical and fauna surveys can be found in **Appendix B**.

5.1.1 BOTANICAL SURVEYS

A walk-through botanical survey method was used following routes to ensure that all parts of the project area were covered. Areas most likely to harbor native or rare plants such as gullys were more intensively examined. Notes were made on plant species, distribution and abundance as well as terrain and substrate.

The June surveys found that the vegetation throughout ConRAC Alternative Sites 4 and 5 consists primarily of non-native species with a few common native species scattered about. No federally listed

threatened or endangered species and no special habitats were found on the property nor were any found that are candidates for such status.

The Airport Access Road corridor consists mostly of open grassland in the southern portion of the highway corridor. The northern portion, where the corridor splits to form the Lanui Circle at the Airport passenger terminal entrance, consists of a variety of grasses, shrubs, and trees. Most of the plant species are non-native weeds typical of disturbed and abandoned agricultural lands. During the October survey a total of 54 plant species were recorded. Just one species, buffelgrass (*Cenchrus ciliaris*) was found to be common throughout the project area. The remaining 53 species were of uncommon or rare occurrence.

Three plant species were native to Hawaii, including the endemic ʻāheahea (*Chenopodium oahuense*) which occurs naturally only in Hawaii, and the alena (*Boerhavia repens*) and the ʻuhaloa (*Waltheria indica*) which are found in Hawaii as well as on other Pacific islands. All three species are widespread and common in Hawaii and are not of any particular conservation concern.

5.1.2 FAUNA SURVEYS

Walk-through fauna survey methods were conducted in conjunction with the botanical surveys. All parts of the project area were covered. Field observations were made with the aid of binoculars and by listening to vocalizations. Notes were made on species, abundance, activities and location as well as observations of trails, tracks, scat and signs of feeding. In addition an evening visit was made to the area to record crepuscular activities and vocalizations and to see if there was any evidence of occurrence of the Hawaiian hoary bat (*Lasiurus cinereus semotus*) in the area.

MAMMALS

During the June 2012 surveys, five species of non-native mammals or their sign were observed during three site visits to ConRAC Alternative Sites 4 and 5. They included feral cats (*Felis catus*), axis deer (*Axis axis*), dog (*Canis familiaris*), mouse (*Mus domesticus*) and rat (*Rattus spp*.). All five species were of rare occurrence in this dry environment and of little concern.

A special effort was made to look for any occurrence of the endemic and endangered Hawaiian hoary bat (*Lasirus cinereus semotus*) by conducting an evening survey on both sites. When present in an area, these bats can be easily identified as they forage for insects and their distinctive flight patterns are clearly visible in the glow of twilight. No evidence of such activity was observed though visibility was excellent. In addition an electronic bat detector (Batbox IIID) was utilized, set to the frequency of 27,000 hertz that these bats are known to use for echolocation. No bats were detected using this device during the June survey.

Two species of mammals were recorded during the October fauna survey. One feral cat (Felis catus) was seen during the evening survey hunting for rodents in the grassland near the Airport. Other common non-native mammals which were not seen, but which would be expected to be present include species of rats (*Rattus spp*.) and mice (*Mus domesticus*) as well as the carnivorous mongoose (*Herpestes auropunctatus*).

During the October surveys a special effort was made to look for any occurrence of the endemic and endangered Hawaiian hoary bat by looking for them visually at twilight and by employing the use of the bat detector described above. No bats were seen at twilight even though visibility was excellent. Later on, however, following darkness, vocalizations of at least one bat were clearly detected, sometimes at quite close range, as it made foraging passes in search of airborne insects, primarily nocturnal moths. This activity was followed closely for over 15 minutes

BIRDS

Fourteen species of non-native birds were observed during the June surveys. Of common occurrence were zebra dove (*Geopelia striata*), nutmeg mannikin (*Lonchura punctulata*), house sparrow (*Passer domesticus*), gray francolin (*Francolinus pondicerianus*) and spotted dove (*Streptopelia chinensis*). The nine other species were of uncommon or rare occurrence. No native forest birds including any endangered waterbirds, were seen or would be expected in this dry habitat. A few other non-native birds such as the cattle egret (*Bubulcus ibis*), northern cardinal (*Cardinalis cardinalis*), Java sparrow (*Padda oryzivora*), and Japanese white-eye (*Zosterops japonicus*) would be occasional visitors to these areas.

Just six species of non-native birds were recorded during the October fauna surveys. Abundant human activity associated with the adjacent Airport passenger terminals as well as a nearby construction project no doubt contributed to decreased birdlife in the project area. Only one bird species, the zebra dove (*Geopelia striata*), was common throughout the area. Somewhat less common was the gray francolin (*Francolinus pondicerianus*). Four other species were rare. A few other common, non-native bird species such as the cattle egret (*Bubulcus ibis*), northern cardinal (*Cardinalis cardinalis*), Java sparrow (*Padda oryzivora*) and Japanese white-eye (*Zosterops japonicas*) would be occasional visitors. No native forest birds or waterbirds were seen or would be expected in this lowland dry habitat.

INSECTS

Insect life was sparse in these two dry sites. ConRAC Alternative Site 4, in particular was nearly devoid of observable insects. Only a few of the hardy short-horned grasshoppers (*Qedaleus abruptus*) were seen. The sparse growth of dry grass was not conducive to diversity of insects.

ConRAC Alternative Site 5 showed more diversity with a total of 13 non-native species among seven insect orders. Four species were common, monarch butterfly (*Danaus plexippus*), cabbage butterfly (*Pieris rapae*), Castor semilooper (*Achaea janata*) and the dung fly (*Musca sorbens*). The remaining nine species were uncommon to rare.

The endemic and endangered Blackburn's sphinx moth (*Manduca blackburni*) has been known to occur in the immediate vicinity of ConRAC Alternative Sites 4 and 5 but was not observed during the June survey. This large moth has developed an alternative host plant relationship with the non-native tree tobacco (*Nicotiana glauca*), which is playing a role in the moth's survival and recovery. Several tree tobacco plants were seen on both ConRAC Alternative Sites 4 and 5. Examinations of these plants failed to find any eggs or larvae of the moth, although such activity is usually confined to the

winter and early spring months when moisture and rapid plant growth are occurring. The pupae of these moths, however, may be present in the soil and leaf litter below the tree tobacco plants where they migrate after their larvae mature and enter the pupal stage where they would remain until emerging as adults at the onset of the next wet season.

Similar observations were made during the October 2012 survey. The southern part of the project area was nearly devoid of observable insects. Only the hardy short-horned grasshopper (*Odaleus abruptus*) was common here. The sparse growth of dry grass was not conducive to diversity of insects. The northern part of the project area showed more diversity with a total of 13 mostly non-native species spread among six insect Orders. Four species were found to be common, the honey bee (*Apis mellifera*), the Sonoran carpenter bee (*Xylocopa sonorina*), the long-tailed blue butterfly (*Lampides boeticus*) and the short-horned grasshopper. The remaining 9 species were uncommon to rare. One widespread, indigenous dragonfly, the globe skimmer was seen.

The Blackburn's sphinx moth was not observed during the October survey. Approximately 60 tree tobacco plants were seen in the northern part of the project area. Examination of these plants failed to find any eggs or larvae of the moth.

REPTILES & MOLLUSKS

Just one common, non-native reptile, the mourning gecko (*Lepidodactylus lugubris*) was heard calling during the June evening survey on ConRAC Alternative Site 5. No other reptiles or mollusks were seen during the surveys.

5.2 Habitat Status

The endemic and endangered Blackburn's sphinx moth (*Manduca blackburni*) has been known to occur in the area, but was not observed during the botanical and fauna surveys. No eggs or larvae of the moth were located. Approximately 60 tree tobacco plants were observed within the ConRAC Alternative sites and Phase II Airport Access Road Corridor. While no direct evidence of Blackburn's sphinx moth presence was observed, the tree tobacco plant provides potential habitat for the moth.

The October 2012 fauna survey found evidence of the endangered Hawaiian hoary bat through audio observation. The USFWS Recovery Plan for the Hawaiian hoary bat remains unclear as to the critical habitat for the bat, and is being studied further. However, given the urban nature of the proposed project sites and adjacent Airport activities, it is unlikely any critical habitat for the bat exists at the proposed project sites.

5.3 Existing Environment

ConRAC Alternative Sites 4 and 5 and the Phase II Airport Access Road corridor are located in an airport-related environment but are primarily on non-developed lands. ConRAC Alternative Site 4 is located on non-developed land but is close to roadways. The built environment on ConRAC Alternative Site 5 includes roadways, a temporary United Parcel Service facility, and a few temporary maintenance-related structures. ConRAC Alternative Site 5 is partially covered with asphalt and concrete pavements whereas no pavement is present on ConRAC Alternative Site 4. The two sites are surrounded by highly disturbed areas such as buildings, highways, and roadways. Characteristic vegetation in these developed areas is ornamental non-native landscaping plant species whereas vegetation on ConRAC Alternative Sites 4 and 5 consists of natural (predominantly non-native) plant species.

Roadway lighting along the proposed Airport Access Road would be shielded away from the coast and the Kanahā Pond Wildlife Sanctuary to reduce potential lighting impacts on the Hawaiian stilt, the Hawaiian coot, and other coastal birds observed near the location of the proposed projects. Where possible, the HDOT-Airports Division would install native, drought tolerant, and non-wildlife attracting landscaping around the proposed Airport Access Road.

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6. Findings

The vegetation throughout the project area consists primarily of non-native species with a few common native species scattered about. No federally listed threatened or endangered plant species were found on the property nor were any found that are candidates for such status.[26] No special habitats were found on the property either. Because of the above existing conditions there is little of botanical concern on this property, and the proposed projects are not expected to have a significant negative impact on the botanical resources in this part of Maui.

The fauna survey of the Phase II Airport Access Road Corridor found 2 species of mammals, 6 species of birds, and 13 species of insects. Of these only the endangered Hawaiian hoary bat and the globe skimmer dragonfly were native to Hawaii. The behavior and lifestyle of the Hawaiian hoary bat are imperfectly understood. Their nocturnal activity, their solitary, non-colonial social life, their tiny size and their cryptic, inactive diurnal state make them difficult to study. Scientists are only now learning something about their night ranging and seasonal movements. These bats appear to be quite mobile. They have been documented in a wide range of habitats from sea level to high in the mountains, and they appear to be more widespread and less rare than previously thought. It is perhaps not unusual that these bats would occasionally show up in this project area.

The globe skimmer dragonfly is indigenous to the Hawaiian Islands but is also known to occur throughout the tropics worldwide. It is thus widespread and common. It is of no particular conservation interest of concern.

As discussed in previous sections, there is a possibility that pupae of the endangered Blackburn's sphinx moth may currently be present in the soil and leaf litter beneath the approximately 60 tree tobacco plants that are located in the northern portion of the project area, even though no moths, their eggs or larvae were found during the fauna survey.

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[26] U.S. Fish and Wildlife Service. 201. *Endangered and threatened wildlife and Plants. 50 CFR 17.11 & 17.12. Listings and Occurrences for Hawaii*, 1999. Accessd Online: www.fws.gov/endangered.

6.1 Effects

This Biological Assessment, including multiple site surveys has determined that the Blackburn's sphinx moths and the Hawaiian hoary bat are the only endangered species that potentially exist on the proposed project sites. The Blackburn's sphinx moth uses the tree tobacco plants, among others, as habitat and several of these plants have been observed within the project areas. However, the Blackburn's sphinx moths have not been observed on this site. The tobacco tree plants were observed during the botanical surveys of the proposed project sites and could provide habitat for the moth. Audio observations of the Hawaiian hoary bat were made during the October 2012 survey of the Phase II Airport Access Road corridor, using the Batbox IIID. Incidental takes are possible as a result of the proposed projects in the form of loss of habitat for both the Blackburn's sphinx moth and the Hawaiian hoary bat.

6.2 Cumulative Effects

Section 7 (ESA) regulations require the federal action agency to provide an analysis of cumulative effects when requesting initiation of formal consultation. Cumulative effects include the effects of future State, tribal, local, or private actions, not involving a federal action, which are reasonably certain to occur in or adjacent to the project site. Federal actions may include granting a permit for a project, authorizing funds for a project, or actually implementing a project.

For the purposes of this BA, cumulative effects are defined as environmental change that results from the incremental effects of several projects that may be individually minor, but which become significant when considered collectively. Other than the development of the proposed ConRAC facility and Phase II of the Airport Access Road, the significant projects reasonably certain to occur within or adjacent to the action area within the next 10 years is the development of the Maui Business Park.

Anticipated impacts associated with these projects would be related to construction activities and changes to surface traffic patterns. They are not anticipated to increase the type or amount of activity at the Airport, except for temporary increases in construction traffic and greenhouse gas emissions. Thus, when considering the projects identified above as being within the general vicinity of the Study Area, no significant cumulative impacts would be created with respect to the species discussed in this BA.

6.3 Conclusion and Determination

This BA forms the basis for the conclusions presented below regarding the effects of the proposed projects.

The purposes of the BA were: 1) to document plants and animal species that occur or may likely occur on the proposed project sites as well as their status and abundance, and 2) to identify any threatened or endangered species using the proposed project sites or their habitat. Site survey observations found no evidence of Blackburn's sphinx moths; however, plants known to be utilized by the Blackburn's sphinx moths were observed.

The action areas evaluated in this document contain suitable habitat for the Blackburn's sphinx moths so this endangered species may be potentially affected by the proposed projects. Tthe Kanahā Pond and the Kanahā Pond Wildlife Sanctuary, which are located approximately one-quarter mile north of the project sites has been designated as critical habitat areas for the Blackburn's sphinx moths. Therefore, the plant species potentially utilized by the moths present on the two sites could be relocated to these areas. The relocation would occur at the most appropriate time, according to the moth season. Additionally, only one of the two ConRAC alternative sites would be selected for the construction of the CONRAC facility. The other site would remain in its current conditions and tobacco trees plants on this site would be preserved.

An incidental take is possible as a result of the proposed projects in the form of habitat destruction for either the Blackburn's sphinx moth or Hawaiian hoary bat. Mitigating measures and best management practices can be incorporated into the development plans for the proposed ConRAC and Phase II of the Airport Access Road that will help to preserve any existing habitat for these species. The tobacco trees on the project sites that would be impacted could be removed during the most appropriate season. The USFWS will be consulted on the development of this plan and their input incorporated into the mitigating measures. While an incidental take is possible, given the current habitat status and potential mitigating measures, the proposed projects are not likely to adversely affect the Blackburn's sphinx month or Hawaiian hoary bat.

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7. References

50 CRF Part 17, *Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the Blackburn's Sphinx Moth*, Fish and Wildlife Service, Vol. 68, No. 111, June 10, 2003, http://www.gpo.gov/fdsys/pkg/FR-2003-06-10/pdf/03-14144.pdf#page=1.

County of Maui, *Countywide Policy Plan*, March 24, 2010.

County of Maui, *Draft Maui Island Plan*, May, 2010.

County of Maui, *Wailuku-Kahului Community Plan*, 2002.

County of Maui, Zoning Administration and Enforcement Division, *Maui County Code of Ordinances*, February 2, 2012. Accessed online: http://library.municode.com/index.aspx?clientId=16289, Accessed Online: November 9, 2012.

Hobdy, Robert W., *Botanical and Fauna Surveys, CONRAC Sites 4 & 5, Kahului Airport*, June, 2012.

Hobdy, Robert W., *Botanical and Fauna Surveys, Kahului Airport Corridor & Detention Basins 1 & 5*, October, 2012.

Hawaii Department of Transportation – Airports Division, *Kahului Airport Master Plan Update*, July 2012.

Maui Info Source, *Kanaha Pond State Wildlife Sanctuary, Overview*, http://www.mauiinfosource.com/Maui%20History%20&%20Culture/Maui%20Museums%20&%20Historical%20Landmarks/Central%20Maui%20Museums%20&%20Historical%20Landmarks/Kanaha%20Pond/kanaha_pond_main.htm, Accessed August 2012.

Maui Info Source, *Kanaha Pond State Wildlife Sanctuary Overview*, http://www.mauiinfosource.com, Accessed August 2012.

Pacific Islands Fish and Wildlife Office, *Endangered Species in the Pacific Islands*, March 25, 2010, http://www.fws.gov/pacificislands/flora/mauiplantcluster.html, Accessed September 2012.

State of Hawaii, Department of Fish and Wildlife, *Hawaii's Comprehensive Wildlife Conservation Strategy, Terrestrial Mammal, ʻŌpeʻapeʻa or Hawaiian Hoary Bat (Lasiurus cinereus semotus)*, October 1, 2005.

State of Hawaii, Department of Transportation Plan, *Maui Long Range Transportation Plan*, May 1997.

U.S. Fish and Wildlife Service , 50 CRF Part 17, Vol. 68, No. 111, *Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the Blackburn's Sphinx Moth*, June 10, 2003.

U.S. Fish and Wildlife Service. 201. *Endangered and threatened wildlife and Plants. 50 CFR 17.11 & 17.12. Listings and Occurrences for Hawaii*, 1999. Accessd Online: www.fws.gov/endangered.

U.S. Fish and Wildlife Service, *Recovery Plan for the Hawaiian Hoary bat (Lasiurus cinereus semotus)*, May 11, 1998.

U.S. Department of Transportation, Federal Aviation Administration and State of Hawaii Department of Transportation - Airports Division, *Final Environmental Impact Statement, Kahului Airport Improvements*, Kahului, Maui, Hawaii, September 1997.

The Xerces Society for Invertebrate Conservation, *Moths: Blackburn's sphinx moth*, http://www.xerces.org/blackburns-sphinx-moth/, Accessed September 2012.

8. List of Preparers

8.1.1 RICONDO & ASSOCIATES, INC.

Stephen D. Culberson, Director

- Qualifications – Over 20 years of experience in airport environmental and planning studies, with significant experience in preparing and managing environmental assessments and environmental impact statements, airport master planning projects, and activity forecasts.
- Responsibilities – Project management, NEPA documentation, purpose and need, alternatives, affected environment, and environmental consequences.

Brian Philiben, Consultant

- Qualifications – Over 5 years of environmental consulting, with particular expertise in land-use planning.
- Responsibilities – Responsible for managing documentation and project records.

8.1.2 BOTANICAL AND FAUNA SURVEYS

Robert W. Hobdy, Environmental Consultant

- Qualifications – an independent wildlife consultant who has over 37 years of experience with the State of Hawaii Department of Land and Natural Resources.
- Responsibilities – Conducted botanical and fauna surveys of the proposed project sites.

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Appendix A

A.1 Listed Species Reports for Hawaii from U.S. Fish and Wildlife Service

http://ecos.fws.gov/tess_public/pub/stateListingAndOccurrenceIndividual.jsp?state=HI

http://www.fws.gov/pacificislands/publications/listingplants.pdf

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Appendix I

Comment Letters and Responses

Comment Letter No.
AF01

APR 0 1 2013

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, HONOLULU
FORT SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF:

March 27, 2013

Regulatory Branch

File Number **POH-2012-00170**

Munekiyo & Hiraga, Inc.
Attention: Ms. Karlynn Fukuda
305 High Street, Suite 104
Wailuku, Hawaii 96793

Dear Ms. Fukuda:

This responds to your March 6, 2013 letter requesting Department of the Army (DA) review comments on the draft environmental assessment (EA) and Special Management Area Use (SMAU) permit application for the proposed Kahului Airport Consolidated Rental Car Facility (ConRac) at TMK 238001019 (por) and 238001239 located in Kahului, Maui Isle, Hawaii. This project is assigned reference number **POH-2012-00170.** Please cite this reference number in any future correspondence concerning this project. 1-1

We have completed our review of the submitted document pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C 403) (Section 10) and Section 404 of the Clean Water Act (33 U.S.C. 1344) (Section 404). Section 10 requires that a DA permit be obtained from the U.S. Army Corps of Engineers (Corps) prior to undertaking any work activity occurring in, over, or under and affecting navigable waters of the U.S. For tidal waters, the shoreward limit of the Corps' jurisdiction extends to the Mean High Water (MHW) elevation. Section 404 requires that a DA permit be obtained for the discharge (placement) of dredged and/or fill material into waters of the U.S., including wetlands. For tidally influenced waters, in the absence of adjacent wetlands, the shoreward limit of the Corps' jurisdiction extends to the High Tide Line (HTL) elevation, which in Hawai'i may be approximated by reference to the Mean Higher High Water (MHHW) elevation. For non-tidal waters, the lateral limits of the Corps' jurisdiction extend to the Ordinary High Water Mark (OHWM) or the approved delineated boundary of any adjacent wetlands. 1-2

Based on the submitted information and available resources, we have identified the following aquatic resources, which may be subject to the Corps' regulatory jurisdiction, present within and adjacent to the Kahului Airport boundary: 1) Kanaha Pond and Wildlife Sanctuary; 2) Kalianui Gulch; 3) an unnamed Corps-verified wetland (Corps letter dated February 28, 2013); and 4) the Pacific Ocean. Once a project alternative is selected for development, we recommend you submit the proposed project plans for our review and request a DA permit determination. 1-3

Thank you for providing us with the opportunity to comment. Should you have any questions, please contact Ms. Joy Anamizu by phone at (808) 835-4308, fax (808) 835-4126, or via e-mail at *Joy.N.Anamizu@usace.army.mil.* You are encouraged to provide comments on 1-4

your experience with the Honolulu District Regulatory Branch by accessing our web-based customer survey form at *http://per2.nwp.usace.army.mil/survey.html*.

1-4 cont.

Sincerely,

George P. Young, P.E.
Chief, Regulatory Branch

Copy furnished:
Jeffery Chang, DOT-Airports Division, jeff.chang@hawaii.gov
Paul Fasi, County of Maui, Department of Planning

RESPONSE TO COMMENT 1 (AF-01)

Response 1-1:

Comment noted.

Response 1-2:

Please see Section 3.7.2, "Water Resources", Section 3.7.3, "Wetlands", and Section 3.7.5, "Coastal Areas" for a discussion of the wetland and coastal resources in the vicinity of the Airport. The Alternative 5 site lies on 16.7 acres of undeveloped land, as well as land with temporary structures (UPS package processing facility). This site is slightly concave in shape, with the lowest elevations situated alongside the Kalialinui Stream channel, which passes directly under the site in a buried concrete aqueduct. Kalialinui Stream, which is the only aquatic resource on or near the Alternative 5 site, was evaluated for its potential to be included in Waters of the United States. The "relevant reach" of Kalialinui Stream stretches upstream from the "Traditional Navigable Water," the Pacific Ocean, for 16,000 linear feet to just below the Haiku Ditch at 180 feet above msl where the first small unnamed tributary flows into Kalialinui Stream. This stretch of Kalialinui Stream was found to be an ephemeral stream, a "Non-Relatively Permanent Water", without adjacent wetlands. Using a significant Nexus Determination analysis, Kalialinui Stream was found to be included in the jurisdictional Waters of the United States. The reach of the Kalialinui Stream that crosses the Proposed Action site is buried in a concrete aqueduct that would not be affected by construction or operation of the proposed ConRAC facility; thus, there would be no impact to jurisdictional Waters of the United States.

Response 1-3:

Please see Section 3.7.2, "Water Resources", Section 3.7.3, "Wetlands", and Section 3.7.5, "Coastal Areas" for a discussion of the wetland and coastal resources in the vicinity of the Airport. A wetland survey of the Alternative 4 and 5 sites was conducted to determine whether any wetland or jurisdictional Waters of the United States are present within either site. No wetlands were found on either the Alternative 4 or Alternative 5 site and both sites were determined to consist of entirely non-wetland uplands, as defined by the U.S. ACE. The selected alternative, Alternative Site 5, would have no effect on these resources. The Kalialinui Stream [Gulch] traverses Alternative Site 5 in an underground culvert, which would be protected and maintained throughout construction and operation of the proposed ConRAC facility.

Response 1-4:

Comment noted.

Comment Letter No.
AF02

E-13.011
E-13.0080

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

March 12, 2013

Jeffrey Chang
Engineering Program Manager
State of Hawaii, Department of Transportation
Airport Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Chang:

This is in response to your request for comments on Draft Environmental Assessment (EA) and Special Management Area Use Permit Application for Proposed Kahului Airport Consolidated Rental Car Facility (ConRAC) at TMK (2) 3-8-001:019 (por.) and 239, Kahului, Maui, Hawaii.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Maui (Community Number 150003), Maps revised September 19, 2012. Please note that the County of Maui, Hawaii is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65. 2-1

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map. 2-2

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways. 2-3

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components. 2-4

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm. 2-5

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Maui County floodplain manager can be reached by calling Francis Cerizo, FPA, Staff Planner, at (808) 270-7771. 2-6

If you have any questions or concerns, please do not hesitate to call Sarah Owen of the Mitigation staff at (510) 627-7050.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Francis Cerizo, FPA, Staff Planner, Maui County
Carol L. Tyau-Beam, NFIP State Coordinator, HI Department of Land & Natural Resources
Sarah Owen, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

RESPONSE TO COMMENT 2 (AF-02)

Response 2-1:

The updated September 2012 Flood Insurance Rate Map is provided in Section 3.7.4, "Floodplains" and the text was revised to discuss potential effects to floodplains based on that map. DOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. DOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.

Response 2-2:

The proposed ConRAC facility would be constructed so that the lowest occupied floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map for the area. Section 4.9, "Floodplains" has been revised to describe the building in relation to the Base Flood Elevation.

Response 2-3:

DOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. DOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.

Response 2-4:

All structures associated with the Proposed Action would be constructed outside of "V" Flood Zones delineated on the FIRM, outside of coastal high hazard areas.

Response 2-5:

Comment noted. DOT-A would submit hydrologic and hydraulic data corresponding to any changed conditions within the 100-year floodplain associated with Kalialinui Gulch within six months of completion of the ConRAC project.

Response 2-6:

Comment noted. DOT-A is coordinating with the Maui County Planning Department on potential effects to the 100-year floodplain. Following discussions with the County Planning Department, an application for a Letter of Map Revision (LOMR) will be filed by the DOT-A or its consultants in the near future for the Kahului Airport area. The County Planning Department noted that the LOMR would amend the existing flood designations for the Kahului Airport area, including the proposed project site. DOT-A will continue to coordinate with the Planning Department on the LOMR application.

Comment Letter No.
AF03

United States Department of Agriculture

NRCS

Natural Resources Conservation Service
77 Ho'okele Street, Suite 202
Kahului, HI 96732
Phone 808-871-5500
Fax 808-873-6184

March 14, 2013
Via Fax 808-838-8753

Mr. Jeffrey Chang, Engineering Program Manager
Hawaii Department of Transportation
DOT – Airports Division (AIR-EP), Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, HI 96819

Subject: Draft Environmental Assessment
Consolidated Rental Car Facility, Kahului Airport

Dear Mr. Chang:

I have no comments at this time. 3-1

Sincerely,

Ranae Ganske-Cerizo
District Conservationist

Helping People Help the Land

An Equal Opportunity Provider and Employer

RESPONSE TO COMMENT 3 (AF-03)

Response 3-1:

Comment noted.

Comment Letter No.
AS01

E-13.0168

NEIL ABERCROMBIE
GOVERNOR

KATHRYN S. MATAYOSHI
SUPERINTENDENT

Received
APR 11 2013

STATE OF HAWAI'I
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAI'I 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

March 25, 2013

TO: Airports Division (AIR-EP), Engineering Branch
Department of Transportation

ATTN: Mr. Jeffrey Chang, Engineering Program Manager

FROM: Kenneth G. Masden II, Public Works Manager
Planning Section, Facilities Development Branch

SUBJECT: **Draft Environmental Assessment, Consolidated Rental Car Facility, Kahului Airport, Kahului, Hawaii, Project No. AS1062-02**

The Department of Education (DOE) has reviewed the Draft Environmental Assessment for the Consolidated Rental Car Facility at Kahului Airport dated March 2013.

The DOE has no comment to offer regarding this project. 4-1

Thank you for the opportunity to provide comments. If you have any questions, please call Roy Ikeda of the Facilities Development Branch at 377-8301.

KGM:jmb

c: Raymond L'Heureux, Assistant Superintendent, OSFSS

RESPONSE TO COMMENT 4 (AS-01)

Response 4-1:

Comment noted.

Comment Letter No. AS02

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

March 8, 2013

Received
MAR 13 2013

In reply, please refer to:
File:
13-055
Rental Car Facility

Mr. Ura Quoniou
Ricondo & Associates
3239 Ualena Street
Third Floor
Honolulu, Hawaii 96819

Dear Mr. Quoniou:

SUBJECT: Draft Environmental Assessment, Consolidated Rental Car Facility, Kahului Airport

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter dated March 6, 2013. Thank you for allowing us to review and comment on the subject document. Your document was routed to the Clean Water and Indoor & Radiological Health Branches. They will provide specific comments to you if necessary. EPO recommends that you review the Standard Comments (www.hawaii.gov/health/epo under the land use tab). You are required to adhere to all Standard Comments specifically applicable to this application. 5-1

EPO suggests that you examine the many sources available on strategies to support the sustainable design of communities, including the:
U.S. Environmental Protection Agency's sustainability programs: www.epa.gov/sustainability
U.S. Green Building Council's LEED program: www.new.usgbc.org/leed 5-2

The DOH encourages everyone to apply these sustainability strategies and principles early in the planning and review of projects. We also request that for future projects you consider conducting a Health Impact Assessment (HIA). More information is available at www.cdc.gov/healthyplaces/hia.htm. We request you share all of this information with others to increase community awareness on sustainable, innovative, inspirational, and healthy community design. 5-3

We request a written response confirming receipt of this letter and any other letters you receive from DOH in regards to this submission. You may mail your response to 919 Ala Moana Blvd., Ste. 312, Honolulu, Hawaii 96814. However, we would prefer an email submission to epo@doh.hawaii.gov. We anticipate that our letter(s) and your response(s) will be included in the final document. If you have any questions, please contact me at (808) 586-4337. 5-4

Mahalo,

Laura Leialoha Phillips McIntyre, AICP
Manager, Environmental Planning Office

RESPONSE TO COMMENT 5 (AS-02)

Response 5-1:

Comment noted. The Standard Comments referenced in the comment letter were reviewed, as recommended. Responses to the Standard Comments are provided below.

- Hazard Evaluation and Emergency Response Office – no known release of petroleum, hazardous substances, pollutants, or contaminants has occurred on the site. The Proposed Action site was not formerly used for sugarcane production.
- Clean Air Branch – Measures to minimize fugitive dust would be incorporated into the construction plans, as discussed in Section 4.18, "Construction Impacts".
- Clean Water Branch – Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.
- Safe Drinking Water Branch – The Proposed Action would not affect public drinking water sources. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.
- Solid and Hazardous Waste Branch – Section 4.17, "Hazardous Materials, Pollution Prevention, and Solid Waste", discusses potential effects of the Proposed Action on hazardous materials and solid waste. The Proposed Action would not include underground storage tanks. Gasoline storage tanks associated with the proposed ConRAC facility would be aboveground, installed and operated in compliance with all federal, State, and local regulations.
- Wastewater Branch – The proposed ConRAC facility's restrooms and potable water would connect to the existing sewer system and would not generate significantly increased levels of wastewater. The car washing facilities would have a separate collection system that would include a recycling system to minimize the amount of wastewater generated by car washing activities. No wastewater from the car washing facilities would drain into the County sewer system.
- Noise, Radiation & Indoor Air Quality Branch – The proposed ConRAC facility would comply with the Administrative Rules of the Department of Health. Also, see response to Comment 7-2 concerning construction noise.

Response 5-2:

Comment noted. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 5-3:

Comment noted.

Response 5-4:

A written response confirming receipt of this letter was transmitted via email on March 18, 2013, from Ura Quoniou, Ricondo & Associates, Inc. In addition, all letters received on this project received a written response from DOT-A (see Appendix J).

Comment Letter No.
AS03

MAR 28 2013

'ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director

COUNTY OF MAUI

DEPARTMENT OF PLANNING

TRANSMITTAL

March 4, 2013

	STATE AGENCIES
x	DAGS
x	DBEDT
x	Dept of AG, Honolulu
x	Dept of Hawaiian Homelands
x	Dept of Health, Honolulu
x	Dept of Health, Maui (2)
x	DLNR-Land, Maui
x	DLNR-Planning (5)
x	DLNR-SHPD, Maui
x	Office of Hawaiian Affairs
x	Office of Planning
	OTHER
x	Maui Electric Company

	COUNTY AGENCIES
x	Civil Defense
x	Dept of Environmental Management (2)
x	Dept of Public Works (3 Hard Copies)
x	Dept of Transportation
x	Dept of Water Supply
x	Fire & Public Safety
x	Police Department
x	Planning; Zoning Administration & Enforcement Division (ZAED)
	FEDERAL AGENCIES
x	FEMA
x	FAA
x	Fish & Wildlife
x	U.S. Army Corp. of Engineers (Hard Copy)

PROJECT:	**CONSOLIDATED RENTAL CAR FACILITY AT THE KAHULUI AIRPORT**
APPLICANT:	**State of Hawaii; Department of Transportation**
STREET ADDRESS:	**Kahului Airport, Kahului, Hawaii**
PROJECT DESCRIPTION:	**Consolidated parking structure for rental car companies**
TMK:	**(2) 3-8-001:019**
PERMIT NO.:	**SM1 2013/0002**

TRANSMITTED TO YOU ARE THE FOLLOWING:

x	Application(s)

THESE ARE TRANSMITTED AS CHECKED BELOW:

x	For your Comment and Recommendation

Please identify any comments you would like the Department of Planning (Department) to propose as conditions of project approval. Please also provide any previous comments, letters, etc. pertinent to this application. Submit your comments directly to me by **March 25, 2013**. A comment box is also provided to assist you. If no comment, please sign the "No Comment" box and fax to (808) 270-1775. Thank you for your time and assistance. For additional clarification, please contact me at paul.fasi@mauiconty.gov or at (808) 270-7814.

Sincerely,

PAUL F. FASI, Staff Planner

250 SOUTH HIGH STREET, WAILUKU, MAUI, HAWAII 96793
MAIN LINE (808) 270-7735; FACSIMILE (808) 270-7634
CURRENT DIVISION (808) 270-8205; LONG RANGE DIVISION (808) 270-7214; ZONING DIVISION (808) 270-7253

13-055

AGENCY NAME	State Dept. of Health Env. Planning office	PHONE	808 586-4337

Attachment
xc: Clayton I. Yoshida, AICP, Planning Program Administrator (PDF)
Paul F. Fasi, Staff Planner (PDF)
Project File
General File
PFF:nt
K:\WP_DOCS\PLANNING\SM1\2013\0002_ConsolidatedRental\Staff Report to Approval\Agency Transmittal.doc

NO COMMENT			
Signed:	[signature]	Dated:	3/27/2013
Print Name:	Laura McIntyre	Title:	Manager, EPO

6-1

COMMENT/RECOMMENDATION BOX			
Signed:		Dated:	
Print Name:		Title:	

RESPONSE TO COMMENT 6 (AS-03)

Response 6-1:

Comment noted.

MAR 20 2013

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

Comment Letter No.
AS04

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

LORRIN W. PANG, M.D., M.P.H.
DISTRICT HEALTH OFFICER

STATE OF HAWAII
DEPARTMENT OF HEALTH
MAUI DISTRICT HEALTH OFFICE
54 HIGH STREET
WAILUKU, HAWAII 96793

March 19, 2013

Ms. Karlynn Fukuda
Executive Vice President
Munekiyo & Hiraga, Inc.
305 High Street, Suite 104
Wailuku, Hawaii 96793

Dear Ms. Fukuda:

Subject: Draft Environmental Assessment and Special Management Area Use Permit Application for Proposed Kahului Airport Consolidated Rental Car Facility (ConRAC)
TMK: (2) 3-8-001:019 (por.) and 239, Kahului, Maui, Hawaii

Thank you for the opportunity to review this project. We have the following comments to offer:

1. National Pollutant Discharge Elimination System (NPDES) permit coverage maybe required for this project. The Clean Water Branch should be contacted at 808 586-4309. 7-1

2. The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules (HAR), Chapter 11-46, "Community Noise Control." A noise permit may be required and should be obtained before the commencement of work. The Indoor & Radiological Health Branch should be contacted at 808 586-4700. 7-2

3. The project shall connect to the county sewer system. 7-3

It is strongly recommended that the Standard Comments found at the Department's website: http://hawaii.gov/health/environmental/env-planning/landuse/landuse.html be reviewed, and any comments specifically applicable to this project should be adhered to. 7-4

Should you have any questions, please call me at 808 984-8230 or E-mail me at patricia.kitkowski@doh.hawaii.gov.

Sincerely,

Patti Kitkowski

Patti Kitkowski
District Environmental Health Program Chief

c: EPO
Jeffrey Chang, DOT
Paul Fasi, COM/Planning Dept.

RESPONSE TO COMMENT 7 (AS-04)

Response 7-1:

Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements. The text notes that "The Hawaii Department of Health administers the National Pollutant Discharge Elimination System (NPDES) permit program in Hawaii, pursuant to the Clean Water Act. The DOT-A has a National Pollutant Discharge Elimination System (NPDES) General Permit for industrial storm water discharges for the Airport and has developed a Storm Water Pollution Control Plan to minimize discharges of pollutants into storm water and to maintain compliance with this general permit."

Response 7-2:

Section 4.18.1, "Construction Noise", discusses potential construction noise arising from the Proposed Action. The following language has been added to the text to address this comment:

> "According to HAR §11-46-4 for Class C zoning districts including OGG, if construction noise exceeds a level of 70 dBA for more than 10 percent of the time within any 20 minute period at measurement points beyond the property line, then a Community Noise Permit is required. This 70 dBA threshold is applicable for both daytime and nighttime operations within Class C zoning districts. To mitigate potential noise impacts, contractors are required to use reasonable and standard practices, such as using mufflers on diesel and gasoline engines and using properly tuned and balanced machines. HDOT-A can also require additional noise mitigation by contractors, such as a requirement to place temporary noise barriers or restrictions on certain kinds of construction activities to certain times of the day. Use of these mitigation measures combined with the distance from the various construction sites to the OGG property boundary is anticipated to reduce noise levels below the 70 dBA permit threshold at the OGG property boundary. However, if it is determined that noise levels from construction activities below the 70 dBA threshold cannot be achieved for some activities, then HDOT-A would apply for and obtain approval for a Community Noise Permit from the Hawaii Department of Health prior to conducting those activities."

Response 7-3:

Comment noted.

Response 7-4:

Comment noted. Please see response to Comment 5-1.

Comment Letter No.
AS05

E-13.0130

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

Received
APR 11 2013

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 21, 2013

State of Hawaii, Department of Transportation
Airports Division, Engineering Branch
Attention: Mr. Jeffrey Chang, Engineering Program Manager
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

County of Maui, Department of Planning
Attention: Mr. Paul F. Fasi, Staff Planner via email: paul.fasi@mauicounty.gov
250 South High Street
Wailuku, Hawaii 96793

Dear Mr. Chang and Mr. Fasi,

SUBJECT: Draft Environmental Assessment (EA) and Special Management Area (SMA) Use Permit Application for Proposed Kahului Airport Consolidated Rental Car Facility (ConRAC)

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the Engineering Division on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

Comment Letter No.
AS05

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

RECEIVED
LAND DIVISION
2013 MAR 19 AM 10:39
DEPT OF LAND & NATURAL RESOURCES
STATE OF HAWAII

March 11, 2013

MEMORANDUM

TO: TO:

DLNR Agencies:
___Div. of Aquatic Resources
___Div. of Boating & Ocean Recreation
_X_ Engineering Division
___Div. of Forestry & Wildlife
___Div. of State Parks
_X_ Commission on Water Resource Management
_X_ Office of Conservation & Coastal Lands
_X_ Land Division – Maui District
_X_ Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Assessment (EA) and Special Management Area (SMA) Use Permit Application for Proposed Kahului Airport Consolidated Rental Car Facility (ConRAC)
LOCATION: Kahului, Island of Maui; TMK: (2) 3-8-001:019 (por.) and 239
APPLICANT: State Department of Transportation and County of Maui, Department of Planning

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by March 22, 2013.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

( ) We have no objections.
( ) We have no comments.
(✓) Comments are attached.

Signed:
Print Name: Carty S. Chang, Chief Engineer
Date: 3/18/13

cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/LydiaMorikawa
Ref.: DEASMAKahukuiAirportRentalCarFacility
Maui.597

COMMENTS

( ) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone .

(X) Please take note that based on the maps provided it appears that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zones X and AE. The Flood Insurance Program does not have any regulations for developments within Flood Zone X however; it does regulate developments within Zone AE as indicated in bold letters below. 8-1

( ) Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is .

(X) Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267. 8-2

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below: 8-3

( ) Mr. Robert Sumitomo at (808) 768-8097 or Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.

( ) Mr. Frank DeMarco at (808) 961-8042 of the County of Hawaii, Department of Public Works.

(X) Mr. Carolyn Cortez at (808) 270-7813 of the County of Maui, Department of Planning.

( ) Ms. Wynne Ushigome at (808) 241-4890 of the County of Kauai, Department of Public Works.

( ) The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.

(X) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update. 8-4

( ) Additional Comments: _____

( ) Other: _____

Should you have any questions, please call Ms. Suzie S. Agraan of the Planning Branch at 587-0258.

Signed: _____
CARTY S. CHANG, CHIEF ENGINEER

Date: 3/12/03

RESPONSE TO COMMENT 8 (AS-05)

Response 8-1:

Section 3.7.4, "Floodplains" and Section 4.9, "Floodplains" discuss floodplains in the vicinity of the Airport and potential effects of the Proposed Action on floodplains. Please see response to Comment 2-2. DOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. DOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.

Response 8-2:

Comment noted. Section 3.7.4, "Floodplains" and Section 4.9, "Floodplains" discuss floodplains in the vicinity of the Airport and potential effects of the Proposed Action on floodplains. Also, please see responses to Comments 2-2 and 2-3.

Response 8-3:

Comment noted. Section 3.7.4, "Floodplains" and Section 4.9, "Floodplains" discuss floodplains in the vicinity of the Airport and potential effects of the Proposed Action on floodplains. Also, please see response to Comment 2-6.

Response 8-4:

The proposed ConRAC facility would consolidate existing facilities and functions into one location. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Comment Letter No.
AS06

MAR 20 2013

NEIL ABERCROMBIE
GOVERNOR

JESSE K. SOUKI
DIRECTOR
OFFICE OF PLANNING

OFFICE OF PLANNING
STATE OF HAWAII

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
Web: http://hawaii.gov/dbedt/op/

Ref. No. P-13922

March 18, 2013

Ms. Karlynn Fukuda, Executive Vice President
Munekiyo & Hiraga, Inc.
735 Bishop Street, Suite 238
Honolulu, Hawaii 96813

Dear Ms. Fukuda:

Subject: Draft Environmental Assessment and Special Management Area Use Permit Application for Proposed Kahului Airport Consolidated Rental Car Facility at Tax Map Key: (2) 3-8-001:019 (por.) and 239, Kahului, Maui, Hawaii

Thank you for the opportunity to provide comments on the Draft Environmental Assessment (EA) and Special Management Area (SMA) Use Permit Application for the proposed Kahului Airport Consolidated Rental Car Facility at Tax Map Key: (2) 3-8-001:019 (por.) and 239, Kahului, Maui, Hawaii.

The Office of Planning has reviewed the subject Draft EA and has the following comments to offer:

1. Besides compliance with the National Environmental Policy Act, this EA was also prepared to comply with the Hawaii Environmental Protection Act, as codified in Hawaii Revised Statutes (HRS) Chapter 343. The Hawaii Coastal Zone Management (CZM) Act, HRS Chapter 205A, requires all state and county agencies to enforce the CZM objectives and policies. Section 5.1, Relationships to Plans, Policies, and Controls, pages 5-1 to 5-7, needs to discuss the proposed project's relationship to the Hawaii CZM Act. With the information provided in Section 4.10, Coastal Resources, Section 5.1 should be revised to include an assessment as to how the proposed project conforms to HRS Chapter 205A, CZM objectives and their supporting policies. This is an important component for satisfying the requirements of HRS Chapter 343, and obtaining the SMA use approval. 9-1

2. The National CZM Act requires direct federal activities and development projects to be consistent with approved state coastal programs to the maximum extent practicable. Also, federally-permitted, licensed, or assisted activities occurring in, or affecting the state's coastal zone must be in agreement with the Hawaii CZM Program's objectives and policies. Pursuant to HRS Chapter 205A, the Office of 9-2

Planning is the lead agency of the Hawaii CZM Program. The Office of Planning is currently attached to the Department of Business, Economic Development and Tourism for administrative purposes. The statement of the Draft EA, on page 3-21, should be revised as, "According to [~~the Hawaii Department of Business, Economic Development and Tourism~~] the State of Hawaii Office of Planning, the Proposed Action is not on a list of federal actions that trigger a consistency [~~determination~~] concurrence with the State's Coastal Zone Management Program (CZMP)." 9-2 cont.

The comments in this letter related to the SMA use permit application provide guidance and are not regulatory. The planning department of the various counties is charged with assessing SMA permit applications. Final decision-making is vested in county planning commissions, or the county council. 9-3

If you have any questions regarding this comment letter, please contact Leo Asuncion, CZM Program Manager, at 587-2875.

Sincerely,

Jesse K. Souki
Director

c: Mr. Jeffrey Chang, Airports Division, Department of Transportation
Mr. Paul F. Fasi, Department of Planning, County of Maui

RESPONSE TO COMMENT 9 (AS-06)

Response 9-1:

Comment noted. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act has been included in Section 5.1.

Response 9-2:

Text in Section 3.7.5 has been updated to state: "According to the State of Hawaii Office of Planning, the Proposed Action is not on a list of federal actions that trigger a consistency concurrence with the State's Coastal Zone Management Program (CZMP)."

Response 9-3:

Comment noted. DOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action.

Comment Letter
No. AS07

LINDA LINGLE
GOVERNOR

KAREN SEDDON
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

IN REPLY REFER TO:

12:PEO/44

August 3, 2012

Mr. Gene Matsushige
Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Re: Roadway Improvements and ConRAC Facility, Kahului Airport
State Project No. AM1032-13

Thank you for seeking our comments on the proposed Roadway Improvements and ConRAC Facility at the Kahului Airport. We have no housing-related comments to offer at this time. 18-1

Sincerely,

Karen Seddon
Executive Director

RESPONSE TO COMMENT 18 (AS-07)

Response 18-1:

Comment noted.

Comment Letter
No. AS08

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 14, 2012

Department of Transportation
Attention: Mr. Gene Matsushige, Head Construction Engineer
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Matsushige:

SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments. 19-1

At this time, the DLNR has no comments to offer on the subject matter. If you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

cc: Central Files

RESPONSE TO COMMENT 19 (AS-08)

Response 19-1:

Comment noted.

Comment Letter
No. AS09

DIR 1198

NEIL ABERCROMBIE
GOVERNOR

DEAN H. SEKI
COMPTROLLER

STATE OF HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAI'I 96810-0119

AUG - 3 2012

(P)1163.2

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
2012 AUG -7 A 11: 10

MEMORANDUM

TO: Mr. Gene Matsushige
Airports Division, Engineering Branch
Department of Transportation

FROM: Dean H. Seki
Comptroller

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13
Environmental Assessment (EA), Letter dated July 23, 2012

Thank you for the opportunity to provide comments for the subject project. The proposed location does not impact any of the Department of Accounting and General Service's existing facilities in the area. However alternative site 3, if utilized, is located relatively close to our facilities on Mua Street. If this alternative site is used, it could possibly add additional vehicular traffic along Keolani Place. 20-1

We have no other comments to offer at this time.

Once the EA is prepared, please allow us to review the document to ensure that our facilities are not adversely impacted. 20-2

If you have any questions, please call me at 586-0400 or have your staff call Mr. Alva Nakamura of the Public Works Division at 586-0488.

c: ✓ Honorable Glenn Okimoto, Ph.D., Dir. DOT

RESPONSE TO COMMENT 20 (AS-09)

Response 20-1:

Comment noted. As documented in Chapter 2, "Alternatives", Alternative Site 3 was not carried forward as a feasible alternative for detailed analysis.

Response 20-2:

Comment noted. The Draft EA was submitted to the Department of Accounting and General Services on March 1, 2013 (as part of the SMA application) for review.

Comment Letter No.
AS10

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

12-138
EA Kahului Airport

August 3, 2012

TO: Gene Matsushige
Engineering Branch, Department of Transportation

FROM: Laura McIntyre, Manager
Environmental Planning Office, Department of Health

SUBJECT: Environmental Assessment, Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13
Reference No. AIR-EC 12.0284

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter, dated **July 23, 2012.** Thank you for allowing us to review and comment on the subject document. The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time, but reserve the right to future comments. 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 application should be adhered to. 21-1

The United States Environmental Protection Agency provides a wealth of information on their website including strategies to help protect our natural environment and build sustainable communities at: http://water.epa.gov/infrastructure/sustain/ . The DOH encourages State and county planning departments, developers, planners, engineers and other interested parties to apply these strategies and environment principles whenever they plan or review new developments or redevelopments projects. We also ask you to share this information with others to increase community awareness on healthy, sustainable community design. If there are any questions about these comments please contact me by phone at 586-4337 or email: laura.mcintyre@doh.hawaii.gov. 21-2

C: Glenn M. Okimoto, Director of Transportation

RESPONSE TO COMMENT 21 (AS-10)

Response 21-1:

Comment noted. The Department's Standard Comments were reviewed (see response to Comment 5-1).

Response 21-2:

Comment noted. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Comment Letter No.
AS11

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

LORRIN W. PANG, M.D., M.P.H.
DISTRICT HEALTH OFFICER

STATE OF HAWAII
DEPARTMENT OF HEALTH
MAUI DISTRICT HEALTH OFFICE
54 HIGH STREET
WAILUKU, HAWAII 96793

August 6, 2012

Mr. Gene Matsushige
Airports Division
Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Subject: Environmental Assessment for Construction and Operation of a Consolidated Rental Car Facility at Kahului Airport
State Project No. AM1032-13

Thank you for the opportunity to review this project. We have the following comments to offer:

1. National Pollutant Discharge Elimination System (NPDES) permit coverage maybe required for this project. The Clean Water Branch should be contacted at 808 586-4309. 22-1

2. The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules (HAR), Chapter 11-46, "Community Noise Control." A noise permit may be required and should be obtained before the commencement of work. The Indoor and Radiological Health Branch should be contacted at 808 586-4700. 22-2

It is strongly recommended that the Standard Comments found at the Department's website: http://hawaii.gov/health/environmental/env-planning/landuse/landuse.html be reviewed, and any comments specifically applicable to this project should be adhered to. 22-3

Should you have any questions, please call me at 808 984-8230 or E-mail me at patricia.kitkowski@doh.hawaii.gov.

Sincerely,

Patti Kitkowski
District Environmental Health Program Chief

c EPO

RESPONSE TO COMMENT 22 (AS-11)

Response 22-1:

Please see response to Comment 7-1. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.

Response 22-2:

Please see response to Comment 7-2.

Response 22-3:

Comment noted. The Department's Standard Comments were reviewed (see response to Comment 5-1).

Comment Letter No.
AS12

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

NEIL ABERCROMBIE
GOVERNOR
RICHARD C. LIM
DIRECTOR
MARY ALICE EVANS
DEPUTY DIRECTOR
JESSE K. SOUKI
DIRECTOR
OFFICE OF PLANNING

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-13686

August 7, 2012

To: Gene Matsushige, Head Construction Engineer
Engineering Branch, Airports Division
Department of Transportation

From: Jesse K. Souki, Director

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport
State Project No. AM1032-13 (AIR-EC 12.0281)

Thank you for the opportunity to provide comments on the preparation of a Draft Environmental Assessment (Draft EA) for the subject project. It is our understanding that the Department of Transportation, Airports Division, is proposing the construction and operation of a consolidated rental car facility (ConRAC) at Kahului Airport, and the Draft EA is being prepared to comply with both Federal Aviation Administration requirements under the National Environmental Policy Act and State of Hawaii requirements under the Hawaii Environmental Protection Act.

The proposed ConRAC facilities will include a customer service building, ready/return structure, quick turnaround area, site landscaping, infrastructure improvements, connections to terminal roadway system, and the installation of flat-plate photovoltaic panels of the roof of the ready/return structure. These improvements are proposed to provide necessary space for on-airport rental car companies to accommodate ready/return and quick turn around facilities in a single location at Kahului Airport. Other rental car activities such as excess rental car storage, dealer preparation, and heavy maintenance would continue to occur at the existing rental car facility locations on-airport. The proposed ConRAC will provide adequate facilities for rental car companies, reduce traffic and congestion on terminal roadways, and enhance the customer/passenger experience.

Five on-airport sites, as shown on Exhibit 2 enclosed with the July 23, 2012 memorandum soliciting advanced comments on the preparation of a Draft EA, will be examined, together with a no action alternative and off-site alternatives.

The Office of Planning has reviewed the material provided in your memorandum dated July 23, 2012, and has the following comments to offer:

1. The entire state is defined to be within the Coastal Zone Management Area (Hawaii Revised Statutes (HRS) Section 205A-1 - definition of "coastal zone management area"). The Draft EA should include a section that addresses the proposed project's consistency with the objectives and policies set forth in HRS Section 205A-2.

23-1

2. Based on data from the County of Maui Planning Department, it appears that four of the five on-airport sites being evaluated, Sites 1, 2, 3, and 5, are within the Special Management Area (SMA) established by the County of Maui.

   The County of Maui Planning Department should be consulted to confirm whether the on-airport sites to be examined, as well as any off-airport sites to be considered, are within the SMA, and if so determined, obtain SMA permit requirements for the proposed project.

   If it is determined that the sites (on-airport and off-airport) to be evaluated are within the SMA, the Draft EA should include a section that addresses the guidelines set forth in HRS Section 205A-26.

23-2

Thank you for the opportunity to comment on the preparation of a Draft EA for the proposed Kahului Airport roadway improvements and ConRAC project.

Should you have questions or require clarification on the comments above, please do not hesitate to contact Leo Asuncion, Coastal Zone Management Program Manager, at 587-2875.

RESPONSE TO COMMENT 23 (AS-12)

Response 23-1:

Comment noted. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act was included in Section 4.10, "Coastal Resources" and has also been added to Section 5.1.

Response 23-2:

Comment noted. DOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act has been included in Section 5.1.

Comment Letter No.
AS13

NEIL ABERCROMBIE
GOVERNOR

MAJOR GENERAL DARRYLL D. M. WONG
DIRECTOR OF CIVIL DEFENSE

DOUG MAYNE
VICE DIRECTOR OF CIVIL DEFENSE

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

PHONE (808) 733-4300
FAX (808) 733-4287

August 9, 2012

Mr. Gene Matsushige
Engineering Branch
Airports Division
Department of Transportation
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13

Thank you for the opportunity to comment on this proposed project.

After review of the documents provided for the subject project, we have determined that the proposed project area falls within coverage ares of existing warning sirens. We anticipate reviewing the Draft Environmental Assessment upon its completion. 24-1

If you have any questions please call Ms. Havinne Okamura, Hazard Mitigation Planner, at 733-4300, extension 556.

Sincerely,

EXECUTIVE OFFICER

FOR DOUG MAYNE
Vice Director of Civil Defense

RESPONSE TO COMMENT 24 (AS-13)

Response 24-1:

Comment noted. The Draft EA was submitted to the Department on March 8, 2013 for review.

Comment Letter No.
AS14

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 29, 2012

Department of Transportation
Attention: Mr. Gene Matsushige, Head Construction Engineer
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Matsushige:

SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13

Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on August 14, 2012, enclosed are comments from the Commission on Water Resource Management on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

25-1

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

August 28, 2012

REF: Kahului Airport Improvements EA Prep

TO: Russell Tsuji, Administrator
Land Division

FROM: William M. Tam, Deputy Director
Commission on Water Resource Management

SUBJECT: Roadway Improvements and CONRAC Facility, Kahului Airport, State Project No. AM1032-13, Kahului, Island of Maui

FILE NO.:
TMK NO.: (2)3-8-01(varies)

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at http://www.hawaii.gov/dlnr/cwrm.

Our comments related to water resources are checked off below.

☐ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.

☒ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan. 25-2

☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.

☒ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/pp/index.htm. 25-3

☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/czm/initiative/lid.php. 25-4

☒ 6. We recommend the use of alternative water sources, wherever practicable. 25-5

☐ 7. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM:
Additional information and forms are available at http://hawaii.gov/dlnr/cwrm/resources_permits.htm.

☐ 8. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.

☐ 9. A Well Construction Permit(s) is (are) required before any well construction work begins.

☐ 10. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.

☐ 11. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.

☐ 12. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.

☐ 13. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.

☐ 14. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.

☐ 15. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.

☒ 16. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources. 25-6

☒ OTHER:
For project landscaped areas, we recommend following the Landscape Industry Council of Hawaii's irrigation water conservation best practices (http://landscapehawaii.org/_library/images/lich_irrigation_water_position_statement%2020110107.pdf).
We also recommend that stormwater be utlized onsite for irrigation needs to the extent possible, and that water efficient fixtures be used in the offices and vehicle washing facilities. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/products/index.html 25-7

If there are any questions, please contact Lenore Ohye at 587-0216.

8/7/12

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 2, 2012

MEMORANDUM

TO: FROM:

DLNR Agencies:
___Div. of Aquatic Resources
___Div. of Boating & Ocean Recreation
_X_Engineering Division
___Div. of Forestry & Wildlife
___Div. of State Parks
_X_Commission on Water Resource Management
_X_Office of Conservation & Coastal Lands
_X_Land Division – Maui District
_X_Historic Preservation

RECEIVED
LAND DIVISION
2012 AUG -2 P 2:28
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

FROM: TO: Russell Y. Tsuji, Land Administrator
SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13
LOCATION: Kahului, Island of Maui; TMK: (2) 3-8-01 (varies)
APPLICANT: State Department of Transporatation

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by August 13, 2012.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

2012 AUG -3 AM 8:13

Attachments

( ) We have no objections.
( ) We have no comments.
(X) Comments are attached.

Signed:
Print Name: William M. Tam, Deputy Director
Date: August 28, 2012

cc: Central Files

RESPONSE TO COMMENT 25 (AS-14)

Response 25-1:

Comment noted.

Response 25-2:

Comment noted. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The proposed ConRAC would relocate existing functions at the Airport into one location. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation.

Response 25-3:

As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 25-4:

Section 4.7, "Water Quality", discusses potential effects to water quality and the best management practices (BMPs) that would be incorporated into the project. Water quality BMPs would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements.

Response 25-5:

Comment noted. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. Potable water for restrooms, drinking water, car wash facilities, etc. would come from the Maui County Department of Water Supply. The car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 25-6:

As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. Potable water for restrooms, drinking water, car wash facilities, etc. would come from the Maui County Department of Water Supply. The car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 25-7:

Comment noted. See responses to Comment 17-1 and 25-3.

Comment Letter No.
AS-15

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
EMD/CWB

05075PJF.13

May 24, 2013

Mr. Steve Culberson
Ricondo & Associates, Inc.
3239 Ualena Street, 3rd Floor
Honolulu, Hawaii 96819

Received
MAY 28 2013

Dear Mr. Culberson:

SUBJECT: Draft Environmental Assessment (DEA) for Consolidated Rental Car Facility Kahului, Island of Maui, Hawaii

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated March 6, 2013, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the 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://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf. 34-1 34-2

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). 34-3

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). An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the CWB Individual NPDES Form through the e-Permitting Portal and the hard copy certification 34-4

statement with $1,000 filing fee. Please open the e-Permitting Portal website at: https://eha-cloud.doh.hawaii.gov/epermit/View/home.aspx. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the "CWB Individual NPDES Form." Follow the instructions to complete and submit this form. 34-4 Cont.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 438-9258) regarding their permitting requirements. 34-5

   Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and HAR, Chapter 11-54. 34-6

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Non-compliance 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. 34-7

If you have any questions, please visit our website at: http://www.hawaii.gov/health/environmental/water/cleanwater/index.html, or contact the Engineering Section, CWB, at 586-4309. 34-8

Sincerely,

Darryl Lum TA for AW

ALEC WONG, P.E., CHIEF
Clean Water Branch

JF:np

c: DOH-EPO #13-055 [via e-mail only]

RESPONSE TO COMMENT 34 (AS-15)

Response 34-1:

Comment noted.

Response 34-2:

Comment noted. The Clean Water Branch's Standard Comments (dated August 22, 2008) were reviewed. Please see response to Comment 5-1.

Response 34-3:

Please see response to Comment 1-2 and Comment 7-1. Kalialinui Stream is not included in the State of Hawaii, Department of Health water quality monitoring assessment; however, the Department of Health reports that the waters off of Kanahā Beach are attaining water quality standards.

Section 4.7, "Water Quality", discusses potential effects to water quality and the best management practices (BMPs) that would be incorporated into the project. Water quality BMPs would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements.

Response 34-4:

Please see response to Comment 7-1. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.

Response 34-5:

Please see response to Comment 1-2. The U.S. Army Corps of Engineers, Regulatory Branch has been contacted and coordinated with during the preparation of the EA.

Response 34-6:

As described in Section 4.8, "Wetlands", Kalialinui Stream, which lies in a culvert beneath the Alternative 5 site, is a jurisdictional Waters of the United States. Because this stream passes directly under the site in a buried concrete aqueduct, it would not be affected by the construction or operation of the proposed ConRAC facility if it is protected during construction and through implementation of BMPs. Kalialinui Stream would continue to serve as an ocean outlet for storm water originating on the Airport and as a key element of the Airport storm water drainage system.

Response 34-7:

Comment noted. Drainage improvements include the construction and operation of two storm water detention basins to prevent an increase in runoff from Alternative site 5. Applicable BMPs and erosion-control measures would be implemented to mitigate runoff during construction-related activities as described in Section 4.19.3, "Construction Impacts – Water Quality". Also, please see response to Comment 25-5.

Response 34-8:

Comment noted.

Comment Letter No.
AS-16

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

June 3, 2013

Received
JUN 11 2013

Mr. Steve Culberson
Ricondo & Associates, Inc.
3239 Ualena Street, Third Floor
Honolulu, HI 96819

Dear Mr. Culberson:

This correspondence is in response to your request for comments to the Draft Environmental Assessment for the Consolidated Rental Car Facility at Kahului Airport.

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

- Chapter 11-46 Community Noise Control
- Chapter 11-501 Asbestos Requirements
- Chapter 11-503 Fees for Asbestos Removal & Certification
- Chapter 11-504 Asbestos Abatement Certification Program

35-1

Should you have any questions, please contact me at (808) 586-4701.

Sincerely,

Jeffrey M. Eckerd
Program Manager
Indoor and Radiological Health Branch

C: Federal Aviation Administration, Honolulu Airports District Office
State of Hawaii, Department of Transportation, Airports Division
Hawaii State Library
Kahului Public Library

RESPONSE TO COMMENT 35 (AS-16)

Response 35-1:

Comment noted. As described in the response to Comment 5-1, the proposed ConRAC facility would comply with the Administrative Rules of the Department of Health. See response to Comment 7-2 regarding Chapter 11-46, "Community Noise Control."

E-13.0117

ALAN M. ARAKAWA
MAYOR

Comment Letter No.
AL01

JEFFREY A. MURRAY
CHIEF

ROBERT M. SHIMADA
DEPUTY CHIEF

COUNTY OF MAUI
DEPARTMENT OF FIRE AND PUBLIC SAFETY
FIRE PREVENTION BUREAU

313 MANEA PLACE • WAILUKU, HAWAII 96793
(808) 244-9161 • FAX (808) 244-1363

March 22, 2013

To : Jeffrey Chang
Engineering Program Manager
State of Hawaii, Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Blvd., Suite 700
Honolulu, HI 96819

Re : Draft EA and SMA for the Kahului ConRAC Facility

Dear Mr. Chang:

Thank you for the opportunity to comment on the subject project. At this time, the Department of Fire & Public Safety has no comment in regards to the Draft EA or SMA application.

Our department does reserve the right to comment during the building permit process and any special permit approvals, e.g., fuel storage, requested from our office.

10-1

If there are any questions or comments, please feel free to contact me at 244-9161 ext. 23.

Regards,

Paul Haake
Captain, Fire Prevention Bureau
Department of Fire & Public Safety
313 Manea Place
Wailuku, HI 96793

RESPONSE TO COMMENT 10 (AL-01)

Response 10-1:

Comment noted. DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.

Comment Letter No.
AL02

DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
HOUSING DIVISION
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
JO-ANN T. RIDAO
Director
JAN SHISHIDO
Deputy Director

35 LUNALILO STREET, SUITE 102 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7351 • FAX (808) 270-6284

Received
MAR 21 2013

March 18, 2013

Mr. Ura Quoniou
Ricondo & Associates
3229 Ualena Street, Third Floor
Honolulu, Hawaii 96819

Dear Mr. Ura Quoniou:

Subject: Draft Environmental Assessment (EA) on the Consolidated Rental Car Facility, Kahului Airport, Kahului, Maui 96732 TMK (2) 3-8-001:239, (2) 3-8-001:123 & (2) 3-8-079:021

The Department has reviewed the Draft Environmental Assessment (EA) for the above subject project. Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. At the present time, the Department has no additional comments to offer. 11-1

Please call Mr. Veranio Tongson Jr. of our Housing Division at (808) 270-1741 if you have any questions.

Sincerely,

Wayde T Oshiro

WAYDE T. OSHIRO
Housing Administrator

cc: Director of Housing and Human Concerns

RESPONSE TO COMMENT 11 (AL-02)

Response 11-1:

Comment noted.

Comment Letter No.
AL03

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director
BRIANNE SAVAGE
Deputy Director

(808) 270-7230
FAX (808) 270-7934

E-13.0129

DEPARTMENT OF PARKS & RECREATION
700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

Received
APR 11 2013

March 28, 2013

Mr. Jeffrey Chang, Engineering Program Manager
Hawaii Department of Transportation
DOT-Airports Division (AIR-EP), Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, HI 96819

Dear Mr. Chang:

SUBJECT: Draft Environmental Assessment, Consolidated Rental Car Facility, Kahului Airport

Thank you for the opportunity to review and comment on the subject project.

The Department of Parks & Recreation is in support of the project. Furthermore, the Department agrees that Alternative Sites 4 & 5 best meet the criteria for the Consolidated Rental Car Facility, and neither site will affect the County of Maui's Kanaha Beach Park. 12-1

Should you have any questions or concerns, please feel free to contact me or Robert Halvorson, Chief of Planning and Development, at (808) 270-7931.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning & Development

GTC:RH:csa

S:\PLANNING\CSA\County Reviews\EA & EIS Reviews\ConRAC Facility Kahului Airport DEA.doc

RESPONSE TO COMMENT 12 (AL-03)

Response 12-1:

Comment noted.

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director

Comment Letter No.
AL04

COUNTY OF MAUI
DEPARTMENT OF PLANNING

April 3, 2013

Hawaii Department of Transportation
DOT-Airports Division (AIR-EP), Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, Hawaii 96819

Attention: Jeffrey Chang, Engineering Program Manager

Dear Mr. Chang:

SUBJECT: REQUEST FOR COMMENTS (RFC) ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR THE PROPOSED CONSOLIDATED RENTAL CAR FACILITY, LOCATED AT KAHULUI AIRPORT, MAUI, HAWAII; (RFC 2013/0038)

The Department of Planning (Department) is in receipt of the above-referenced RFC. At this time, the Department has one (1) comment to offer: The parcel is located in the Special Management Area (SMA) and will be required to acquire a SMA Permit. 13-1

Thank you for the opportunity to comment. Should you require further clarification, please contact Staff Planner Paul Fasi at paul.fasi@mauicounty.gov or at (808) 270-7814.

Sincerely,

CLAYTON I. YOSHIDA, AICP
Planning Program Administrator

for WILLIAM SPENCE
Planning Director

xc: Paul F. Fasi, Staff Planner (PDF)
Michael T. Munekiyo, AICP, President, Munekiyo & Hiraga, Inc.
Project File
General File

WRS:CIY:PFF:vb
K:\WP_DOCS\PLANNING\RFC\2013\0038_ConsolidatedRental\LTR1.doc

RESPONSE TO COMMENT 13 (AL-04)

Response 13-1:

DOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action.

Comment Letter No.
AL05

APR 30 2013

ALAN M. ARAKAWA
Mayor

DAVID C. GOODE
Director

ROWENA M. DAGDAG-ANDAYA
Deputy Director

Telephone: (808) 270-7845
Fax: (808) 270-7955

GLEN A. UENO, P.E., Interim
Development Services Administration

CARY YAMASHITA, P.E.
Engineering Division

BRIAN HASHIRO, P.E.
Highways Division

COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM NO. 434
WAILUKU, MAUI, HAWAII 96793

April 25, 2013

Ms. Karlynn Fukuda, Executive Vice President
MUNEKIYO & HIRAGA, INC.
305 High Street, Suite 104
Wailuku, Maui, Hawaii 96793

Dear Ms. Fukuda:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT AND SPECIAL MANAGEMENT AREA USE PERMIT APPLICATION FOR PROPOSED KAHULUI AIRPORT CONSOLIDATED RENTAL CAR FACILITY; TMK: (2) 3-8-001:019 (POR.) AND 239; SM1 2013/0002

We reviewed the subject application and have the following comments:

1. The applicant shall be responsible for all required improvements as required by Hawaii Revised Statutes, Maui County Code and rules and regulations. 16-1

2. As applicable, construction plans shall be designed in conformance with Hawaii Standard Specifications for Road and Bridge Construction dated 2005 and Standard Details for Public Works Construction, 1984, as amended. 16-2

3. As applicable, worksite traffic-control plans/devices shall conform to Manual on Uniform Traffic Control Devices for Streets and Highways, 2003. 16-3

Please call Rowena M. Dagdag-Andaya at 270-7845 if you have any questions regarding this letter.

Sincerely,

DAVID C. GOODE
Director of Public Works

DCG:RMDA:ls
xc: Highways Division
Engineering Division
Jeff Chang, State of Hawaii Department of Transportation
Paul Fasi, Department of Planning
S:\LUCA\CZM\prop_kahului_airport_consolidated_car_rental_facility_sma_dea_38001019 with glen ueno_ls

RESPONSE TO COMMENT 16 (AL-05)

Response 16-1:

Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations. DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works, regarding its intent to waive the County building permit requirement for this project.

Response 16-2:

Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations.

Response 16-3:

Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations.

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director

Comment Letter No. AL06

MAY 13 2013

COUNTY OF MAUI

DEPARTMENT OF PLANNING

May 9, 2013

Mr. Glenn Okimoto, Director
State of Hawaii
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Okimoto:

SUBJECT: MAUI PLANNING COMMISSION (COMMISSION) COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR THE PROPOSED CONSOLIDATED RENTAL CAR (ConRAC) FACILITY, LOCATED AT KAHULUI AIRPORT, MAUI, HAWAII; TMK(S): (2) 3-8-001:019 AND (2) 3-8-001:239 (SM1 2013/0002)

At its regular meeting on April 23, 2013, the Commission reviewed and commented on the Draft EA prepared for the State of Hawaii, Department of Transportation's (DOT) Proposed ConRAC Facility at the Kahului Airport. It was noted that the DOT is the Approving Agency for the EA document, and the Commission will review and act on the Special Management Area Use Permit application that was filed with the Department of Planning for the project. The Commission received a presentation by the project's consultant, Ricondo & Associates, Inc. The Commission's comments on the Draft EA are provided below:

1. Provide more information on the visual appearance of the ConRAC Facility and how it will incorporate a Hawaiian sense of place into the design. Also requested for consideration by DOT is to incorporate endemic and indigenous Hawaiian plants and fragrant plants, as this facility will be the first and last impression for visitors to Maui; 17-1

2. Additional discussion on the source of water for the water feature for the Kahului Airport and the landscaping surrounding the ConRAC Facility. Explore the option of using "R-1" water from the County of Maui and/or reuse of the car wash water in the ConRAC Facility for irrigation purposes; 17-2

3. Provide additional information on the height of the ConRAC Facility with the planned grades from Keolani Place and the Airport Access Road. Discussion may include information about set backs and landscaping screening; 17-3

4. General support for the concept of the ConRAC Facility because it will consolidate the rental car operations and assist in controlling environmental impacts from the individual operations; 17-4

5. Ensure that the existing underground drainage channel (Kalialinui Stream) is protected during construction. Also requested for consideration is the installation of grating over the drainage channels for public safety and maintenance; 17-5

6. Discuss how the loss of the future planned overflow parking area with the construction of the ConRAC Facility and the movement of the employee parking stalls to the ConRAC Facility will benefit public parking at the Airport; 17-6

7. Recommends that in designing the facility, DOT consider the operations and maintenance for the ConRAC Facility to ensure that it can be easily maintained; 17-7

8. Requests further clarification of Alternative Site No. 4 and No. 5 in regards to possible future expansion plans for the terminal building, runway, or new roads in the Airport area. Also include consultation with State and Federal agencies, if applicable, for future terminal and public parking facilities plans at the Airport; 17-8

9. Additional discussion on how runoff will be handled onsite or offsite; and 17-9

10. Commented that DOT should consider the use of efficient fixtures (lighting and water fixtures) and installation of security cameras in the ConRAC Facility. 17-10

Thank you for the opportunity to comment on the Draft EA. Should you have any questions or need additional clarification, please contact Staff Planner Paul Fasi at paul.fasi@mauicounty.gov or at (808) 270-7814.

Sincerely,

WILLIAM SPENCE
Planning Director

xc: Paul F. Fasi, Staff Planner (PDF)
Karlynn Fukuda, Munekiyo & Hiraga, Inc.
UDRB File
Project File
General File

WRS:PFF:aj
K:\WP_DOCS\PLANNING\SM1\2013\0002_ConsolidatedRental\Staff Report to Approval\MPC Comment Letter to SDOT.doc

RESPONSE TO COMMENT 17 (AL-06)

Response 17-1:

Through input and direction from the airport stakeholders, the design team has identified and implemented a cultural theme and concept that is based on the Plantation Style architecture found locally in Wailuku and Lahaina. These cultural guiding principles informed decisions concerning overall building massing along with specific materials and color palette and would directly shape the building's aesthetics.

The essence of the Plantation Style is a formal prominence created by a strong, simple roof form that diminishes in height on either end. The Plantation Style includes a central, prominent roof form as its major feature. The floor plan is massed around a central enclosed space and large perimeter lanai formed by large, deep roof overhangs. The ConRAC massing and proportions have been created following these Plantation Style principles. The facility would feature prominent roof forms topping the south and north edges along with metal trellis screening and masonry walls below. The entire structure would be surrounded by a landscape buffer featuring indigenous planting to soften and shield the building.

Visitors to the facility would be welcomed into a large lanai that surrounds the central customer service area and circulation cores. These pedestrian areas would feature warm-colored, natural materials. Arranged prominently throughout the plaza would be plantings filled with indigenous Hawaiian vegetation that would greet and welcome customers with the fragrances and colors of Maui. A glass and trellis canopy above would protect visitors and form the primary roof of the Lanai while allowing visitors to connect with the sun, sky and natural light.

The materials for the facility would include a mix of colors and texture inspired by the Plantation Style and local natural features. The prominent use of Shell Stone references the historical use of coral stone on the island within the Plantation Style. In addition to the neutral colored Shell Stone, the project would feature a multi-colored Slate accent stone that would connect with the varied indigenous colors of Maui and set a baseline palette for the accent colors of the facility.

The roofs, screening, trellis and storefronts would use dark bronze metal inspired by the rust and copper colors seen around the island. The wood accents in the ceiling treatments and handrail components would take inspiration from the historical use of Koa wood.

These forms, materials and landscaping would create a cohesive composition that would incorporate a Hawaiian sense of place into the facility while forming a lasting impression for visitors.

Response 17-2:

It is noted that DOT-A met with Mayor Arakawa, most recently in March 2013, to discuss the potential use of R-1 water for irrigation purposes at the ConRAC facility. Based on those discussions, it is our understanding that 1) there are infrastructural improvements needed at the Wailuku-Kahului Wastewater Treatment Facility (WKWWTF) to treat the wastewater to the R-1 level and 2) that distribution infrastructure is needed to distribute the R-1 water

from the WKWWTF. As such, DOT-A would continue to communicate with Mayor Arakawa and his administration on the status of the needed improvements to provide R-1 water to the Kahului Airport site.

The water feature identified in the comment is not part of the Proposed Action. However, the source of water for the water feature is non-potable water from the existing on-site A&B well. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. The car wash facilities in the ConRAC would utilize a recycling system to minimize water use; thus, this water would not be used for irrigation. As for the R-1 water, DOT-A would provide future connection (stubs) for a potential future R-1 connection.

Response 17-3:

General grading of the site would slope from 40 feet above ground level along the future inbound airport roadway down to 20 feet above ground level along the future outbound airport roadway. Site grading would level out towards Keolani Place. The ConRAC facility would sit on the project site with the basement level at 13 feet above existing ground level. Total building height would be limited to the absolute minimum with the highest point at approximately 60 feet above the basement floor. The design team is fully aware and respectful of the desire to limit the building height in keeping with the surrounding area. Several features have been incorporated into the design of the ConRAC facility that would achieve that goal. These include a 20-foot setback on the north and south sides, reducing the perimeter bays on Level 3, addition of perimeter canopies, and utilizing the natural grading of the site. When viewed from the terminal, only Level 2 and 3 would be visible therefore creating an impression of a 2-story building.

Response 17-4:

Comment noted.

Response 17-5:

The reach of the Kalialinui Stream that crosses the Proposed Action site is buried in a concrete aqueduct that would not be affected by construction or operation of the proposed ConRAC facility. DOT-A will examine whether the installation of grates for public safety and maintenance purposes is feasible.

Response 17-6:

The proposed ConRAC facility includes the provision of 719 parking places for Airport employees on the 3rd level. The existing Airport employee parking is located in the parking lot across from the passenger terminal, behind the Airport public parking. These dedicated Airport employee parking spaces would be converted to Airport public parking, increasing public parking spaces.

A parking study for employee and public parking at Kahului Airport was conducted as part of the Site Selection Study for the ConRAC facility. Taking into account the Airport Master Plan forecast, the Federal Aviation Administration Terminal Area Forecast, and demand elasticity associated with the neighbor island market, the

study determined that over 700 parking stalls would be needed over the planning horizon. The design of the ConRAC facility accounted for this future parking stall demand on the top level of the facility. When demand for public parking stalls materializes, the existing employee parking (currently located on the makai side of the surface lot fronting the terminal) will be relocated to the top level of the ConRAC facility to allow public parking to expand within the existing surface lot fronting the terminal.

Response 17-7:

The operation and maintenance of the proposed ConRAC facility would be the responsibility of the rental car companies utilizing the facility. In most cases, when rental car companies share a consolidated facility, a third-party contractor is obtained by the rental car companies to maintain and keep the facility operating. The proposed ConRAC facility is being designed to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which should reduce operation and maintenance costs. The cost to operate and maintain the proposed ConRAC facility is being considered during design of the facility.

Response 17-8:

Chapter 2, Alternatives, discusses the evaluation of each of the consolidated rental car facility site alternatives. As noted in Chapter 2, both Alternative Sites 4 and 5 met the Purpose and Need criteria, but Alternative Site 5 was selected as the Proposed Action, which is also the rental car companies preferred alternative. Alternative Site 5 is located closer to the passenger terminal and the existing rental car baseyards which would continue to function as heavy maintenance, overflow parking, and administrative areas for the rental car companies. Thus, due to the proximity of Alternative Site 5 to the passenger terminal and existing rental car company baseyards, it would result in less operational costs to the rental car companies than Alternative Site 4.

Additionally, Alternative Site 4 is designated in the Wailuku-Kahului Community Plan as "Agricultural", which would require a change to the plan, and a State Special use permit or a State Land Use District Boundary Amendment which would add at a minimum, 18 months to the process. However the site is located out of the SMA area and thus, no SMA Use Permit would be required. The location of this alternative site would complicate the Airport Access Road system and require rental car shuttles to circulate through the terminal roadway system.

DOT-A is preparing a Master Plan Update for Kahului Airport, which identifies future terminal and public parking facility needs. The proposed ConRAC facility is consistent with the Master Plan Update.

Response 17-9:

The excerpt below is the conclusion from the executive summary of the drainage report prepared for this project:

> "The existing peak storm water runoff is 67.64 cubic feet per second (cfs) and the proposed peak storm water runoff is 140.09 cfs. The Proposed Action would increase the storm water flow by 72.45 cfs during the 50-year 1-hour storm. On-site generated storm water would be collected into detention basins and discharged at a controlled rate into the existing drainage system. Therefore, there would be no adverse drainage impacts to the surrounding areas or the existing drainage system."

This language has been added to Section 4.7.2.

Response 17-10:

As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Comment Letter
No. AL07

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director

PATRICK T. MATSUI
Deputy Director

(808) 270-7230
FAX (808) 270-7934

DEPARTMENT OF PARKS & RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

August 10, 2012

Mr. Gene Matsushige
State of Hawaii, Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

Dear Mr. Matsushige:

SUBJECT: Roadway Improvements and ConRAC Facility, Kahului Airport, State Project No. AM1032-13, AIR-EC 12.0279

Thank you for the opportunity to review and comment on the subject project.

The Department of Parks & Recreation is in support of the project. We look forward to reviewing the Environmental Assessment when it is available.] 26-1

Please feel free to contact me or Robert Halvorson, Chief of Planning and Development, at (808) 270-7931, should you have any questions.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning and Development

GTC:RH:ca

RESPONSE TO COMMENT 26 (AL-07)

Response 26-1:

Comment noted. The Draft EA was submitted to the Department on March 8, 2013 for review.

Comment Letter No.
AL08

Director of Council Services
Ken Fukuoka

COUNTY COUNCIL

COUNTY OF MAUI
200 S. HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.mauicounty.gov/council

August 7, 2012

SOH/DOT Airports Division (DOTA)
Attention: Mr. Gene Matsushige
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

SUBJECT: Early Consultation Request for the Preparation of a Draft Environmental Assessment for the Proposed Roadway Improvements and ConRac Facility, Kahului Airport, State Project No. AM1032-13

Dear Mr. Matsushige:

Thank you for the opportunity to provide comments for the proposed Roadway Improvements and ConRac Facility, Kahului Airport, State Project No. AM1032-13.

27-1

After review of the information presented, I have no comments at this time.

Sincerely,

JOSEPH PONTANILLA,
COUNCIL MEMBER

RESPONSE TO COMMENT 27 (AL-08)

Response 27-1:

Comment noted.

Comment Letter No.
AL09

ALAN M. ARAKAWA
Mayor

KYLE K. GINOZA, P.E.
Director

MICHAEL M. MIYAMOTO
Deputy Director

TRACY TAKAMINE, P.E.
Solid Waste Division

ERIC NAKAGAWA, P.E.
Wastewater Reclamation Division

COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2200 MAIN STREET, SUITE 100
WAILUKU, MAUI, HAWAII 96793

August 15, 2012

Mr. Gene Matsushige
State of Hawaii
Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

SUBJECT: **ROADWAY IMPROVEMENTS AND CONRAC FACILITY STATE PROJECT NO. AM1032-13, KAHULUI AIRPORT EARLY CONSULTATION FOR DRAFT EA**

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:

   a. Include a plan for construction waste. — 28-1

2. Wastewater Reclamation Division (WWRD) comments:

   a. Although wastewater system capacity is currently available as of 8/15/2012, the developer should be informed that wastewater system capacity cannot be ensured until the issuance of the building permit. — 28-2
   b. Wastewater contribution calculations are required before building permit is issued. — 28-3
   c. Developer shall pay assessment fees for treatment plant expansion costs in accordance with ordinance setting forth such fees. The property is located in the Kahului Sewer Service Area. — 28-4
   d. Developer is required to fund any necessary off-site improvements to collection system and wastewater pump stations. — 28-5
   e. Indicate on the plans the ownership of each easement (in favor of which party). Note: County will not accept sewer easements that traverse private property. — 28-6

f. Kitchen facilities within the proposed project shall comply with pre-treatment requirements (including grease interceptors, sample boxes, screens etc.) 28-7
g. Non-contact cooling water and condensate should not drain to the wastewater system. 28-8
h. The existing and proposed wastewater system in the Kahului Airport area shall remain privately owned and maintained. 28-9

If you have any questions regarding this memorandum, please contact Michael Miyamoto at 270-8230.

Sincerely,

KYLE K. GINOZA, P.E.
Director of Environmental Management

AM1032-13 OGG Draft EA Response

Kevin H Funasaki -Contractor to Kimberly K Evans 08/24/2012 12:42 PM

Cc: Lynette Kawaoka, u_quoniou

Kim:

As attached, please find the Early Consultation response from the County of Maui - Dept. of Environmental Management for your use and information.

Thanks, Kevin

AM103213_Memo2012.08.15_From_Dept. of Env. Management.pdf

RESPONSE TO COMMENT 28 (AL-09)

Response 28-1:

Section 4.18.4, "Solid and Hazardous Waste", discusses waste generated during construction and how waste would be disposed. As stated in the Draft EA, construction and demolition activities would result in a temporary increase in solid waste generation at the Airport. However, recycling, salvage, reuse, and disposal options would be identified in a Solid Waste Management Plan in advance of all activities to minimize the amount of debris directed to local landfills. This plan would include the identification of locations for sorting materials for reuse and recycling. Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which would include reuse and recycling of materials.

Response 28-2:

Comment noted. As discussed in Section 4.7, "Water Quality", of the EA, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location; thus, water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.

Response 28-3:

As discussed in Section 4.7, "Water Quality", of the EA, water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. Also, DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.

Response 28-4:

As discussed in the response to Comment 28-2 and Comment 28-3, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location.

Response 28-5:

As discussed in the response to Comment 28-2, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location.

Response 28-6:

The proposed ConRAC facility would tie into existing sewer lines on Airport property. No easements would be required.

Response 28-7:

Comment noted. If any kitchen facilities are constructed within the proposed ConRAC facility, they would comply with the County of Maui pretreatment requirements.

Response 28-8:

Comment noted. If any non-contact cooling water and/or condensate is generated by the proposed ConRAC facility it would be separated from the wastewater system.

(This would apply to the car wash wastewater as well. I know on some of the RAC improvements, this was a huge sticking point where DOH wants the car wash water dumped into the sewer system but the County DEM won't allow it. The result was having drywells to dump the water into, unless DEM has changed their stance…)

Response 28-9:

Comment noted. The proposed ConRAC facility would tie into existing sewer lines on Airport property. No changes to the wastewater system would be required.

Comment Letter No.
AL10

DIR 1306

ALAN M. ARAKAWA
Mayor

DAVID C. GOODE
Director

ROWENA M. DAGDAG-ANDAYA
Deputy Director

Telephone: (808) 270-7845
Fax: (808) 270-7955

COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM NO. 434
WAILUKU, MAUI, HAWAII 96793

RALPH NAGAMINE, L.S., P.E.
Development Services Administration

CARY YAMASHITA, P.E.
Engineering Division

BRIAN HASHIRO, P.E.
Highways Division

08-28-12P02:34 RCVD

August 22, 2012

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
2012 AUG 27 P 4:36

Glenn M. Okimoto, Ph.D.
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Dr. Okimoto:

SUBJECT: ROADWAY IMPROVEMENTS AND CONRAC FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

We reviewed the subject application and have no comments at this time, but wish to hold our comments until review of the Draft Environmental Assessment. 29-1

Please call Rowena M. Dagdag-Andaya at (808) 270-7845 if you have any questions regarding this letter.

Sincerely,

DAVID C. GOODE
Director of Public Works

DCG:RMDA:jtc
xc: Highways Division
Engineering Division
S:\LUCA\CZM\Draft Comments\kahului_airport_roadway_improvements_project_am1032-13_jtc.wpd

RESPONSE TO COMMENT 29 (AL-10)

Response 29-1:

Comment noted. The Draft EA was submitted to the Department on March 1, 2013 (as part of the SMA application) for review.

Comment Letter No.
AL11

DIR 1337

DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
HOUSING DIVISION
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
JO-ANN T. RIDAO
Director
JAN SHISHIDO
Deputy Director

35 LUNALILO STREET, SUITE 102 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7351 • FAX (808) 270-6284

August 28, 2012

SIDKM

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
2012 SEP -4 A 11:40

Mr. Glenn M. Okimoto, Ph.D., Director
State of Hawaii, Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Okimoto:

Subject: Preparation of an Environmental Assessment for Roadway and ConRAC Facility at the Kahului Airport, Maui, State project No. AM1032-13.

The Department has reviewed the preparation of an Environmental Assessment (EA) for the above subject project. Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. At the present time, the Department has no additional comments to offer.

30-1

Please call Mr. Veranio Tongson Jr. of our Housing Division at (808) 270-1741 if you have any questions.

Sincerely,

Clyde Almeida
Assistant Housing Administrator

cc: Director of Housing and Human Concerns

RESPONSE TO COMMENT 30 (AL-11)

Response 30-1:

Comment noted.

Comment Letter No.
AL12

Stephen Culberson

From: kevin.h.funasaki-contractor@hawaii.gov
Sent: Thursday, August 23, 2012 8:05 PM
To: kimberly.k.evans@hawaii.gov
Cc: lynette.kawaoka@hawaii.gov; Ura Quoniou
Subject: Fw: Request for Comment Re: State Project No. AM1032-13

FYI: Forward from Maui County. Thanks, Kevin

----- Forwarded by Kevin H Funasaki-Contractor/AIR/HIDOT on 08/23/2012 03:04 PM -----

From: Gene Matsushige/AIR/HIDOT@HIDOT
To: Kevin.h.funasaki-contractor@hawaii.gov,
Date: 08/23/2012 02:07 PM
Subject: Fw: Request for Comment Re: State Project No. AM1032-13

Reply from Maui County

Gene Matsushige, Section Head
STATE OF HAWAII
Department of Transportation
Airports Division
400 Rodgers Blvd., Suite 700
Honolulu, Hawaii 96819-1880
Voice: (808) 838-8826
Cellular: (808) 281-8826
FAX: 838-8751
Email: gene.matsushige@hawaii.gov
gmspeedbird@gmail.com

----- Forwarded by Gene Matsushige/AIR/HIDOT on 08/23/2012 02:07 PM -----

From: "Paul Fasi" <Paul.Fasi@co.maui.hi.us>
To: <gene.matsushige@hawaii.gov>,
Cc: "Clayton Yoshida" <Clayton.Yoshida@co.maui.hi.us>
Date: 08/23/2012 12:50 PM
Subject: Request for Comment Re: State Project No. AM1032-13

Gene,

This is in response to your Dept's. request for comment dated July 23, 2012 (AIR-EC, 12.0279) on the Roadway Improvements and ConRAC Facility at the Kahului Airport.

At this time, the Planning Dept. has no comment. The Dept. would like to thank you for the opportunity to comment. Please call me at 808-270-7814 or respond to this email if you need further clarification.] 31-1

Sincerely,

Paul Fasi
Staff Planner
Maui Planning Dept., Current Div.

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RESPONSE TO COMMENT 31 (AL-12)

Response 31-1:

Comment noted.

Comment Letter No.
PC01

ISAAC DAVIS HALL
ATTORNEY AT LAW
2087 WELLS STREET
WAILUKU, MAUI, HAWAII 96793
(808) 244-9017
FAX (808) 244-6775

Received
APR 09 2013

April 8, 2013

Via Email and U.S. Mail
jeff.chang@hawaii.gov
Department of Transportation, Airport Division,
400 Rodgers Boulevard, 7th Floor,
Honolulu, HI 96819
Contact: Mr. Jeffrey Chang

Re: Inadequacy of Draft Environmental Assessment ("DEA") and Proposed FONSI ("AFNSI") on the Kahului Airport Consolidated Rental Car ("ConRAC") Facility
TMK: (2) 3-8-001:019 (por) and 239
Island: Maui
District: Wailuku

Dear Hawaii Department of Transportation, Airports Division,

The Hawaii Department of Transportation, Airports Division ("HDOT-A"), as the proposing agency, published a Draft Environmental Assessment ("DEA") and Proposed FONSI ("AFNSI") on the Kahului Airport Consolidated Rental Car ("ConRAC") Facility in the March 8, 2013 issue of The Environmental Notice. A 30 day public review and comment period is provided by statute. Comments are due on or by April 8, 2013.

This comment letter is submitted on behalf of nearby residents and stakeholders who are adversely effected by aircraft noise generated through the operation of the Kahului Airport. The extension of Runway 5-23 to 7,000 feet and its use by larger, noisier aircraft will impose even more severe adverse noise impacts upon these residents. Numerous letters have already been sent on behalf of these residents to HDOT-A, the FAA, Hawaiian Airlines and Aloha Air Cargo objecting to any extension of Runway 5-23 and its use by aircraft that would increase adverse noise impacts. 14-1

The closing of existing Rent-A-Car facilities and their relocation to a new ConRAC facility is necessitated by the planned extension of Runway 5-23 to 7,000 feet. These are "connected" actions the impacts of which must be addressed as a single action, as a matter of law. Because the DEA fails to address these as connected actions the DEA is inadequate. A full 14-2 14-3 cont.

Environmental Impact Statement ("EIS") must be prepared now addressing the cumulative and long term impacts of the proposed lengthening of Runway 5-23 to 7,000 feet as it necessitates the closing of existing Rent-A-Car facilities and their relocation to a new ConRAC facility.

14-3 cont.

A. DESCRIPTION OF PROJECT IN DEA

The purpose of the proposed ConRAC Facility at the Kahului Airport is purportedly to provide the necessary space for the on-Airport rental car companies to accommodate the ready/return service and quick turnaround (QTA) facilities in a single location on the Airport. Excess rental car storage, dealer preparation, and heavy maintenance is proposed to continue to be accommodated at the existing rental car facility locations on the Airport. The proposed ConRAC will allegedly provide adequate on-Airport facilities for the rental car companies, reduce traffic and congestion on the terminal roadway system and enhance the overall customer experience at the Kahului Airport.

14-4

The construction of the new ConRAC facility and its related improvements are proposed to be located on approximately 17 acres of land at the Kahului Airport. The ConRAC facility is proposed to include approximately 4,200 parking stalls for rental car use, as well as a quick turnaround area, office, customer service area, and fueling and car wash areas for the various rental car operators.

B. PURPOSE OF A DEA

The purpose of a DEA is to determine, in a short document, whether or not a proposed project "may" have a significant effect on the environment. If the project "may" have a significant effect on the environment a full Environmental Impact Statement ("EIS") "shall" be prepared. HRS § 343-5(b)(1)(D) states that: "A statement **shall** be required if the agency finds that the proposed action **may** have a significant effect on the environment." ("Emphasis added"). In such circumstances the entry of a FONSI is unlawful. Under these circumstances, a full EIS is required by law.

14-5

C. THE DEA IS INADEQUATE AND CANNOT SUPPORT A FONSI AS A MATTER OF LAW AND FACT

The DEA reviews the ConRAC facility as a separate project, in isolation from other interrelated airport projects and thus commits illegal segmentation and "piecemealing" in an attempt to mask the full nature of this project. The DEA discusses the ConRAC facility only within the context of **existing** Kahului Airport facilities. The DEA entirely ignores all substantive discussion and

14-6

analysis of the Kahului Master Plan Update (March 2012)("the Update") that HDOT-A is currently conducting. The Update is available on HDOT's website.[1] 14-6 cont.

The Update presents HDOT-Airport's "Preferred Plan." Among the proposed Master Plan projects to be implemented in the 2015 through 2035 time frame are (1) extending Runway 5-23 to 7,000 feet and (2) closing existing Rent-A-Car facilities and constructing the new ConRAC facility. The Update shows the extended Runway 5-23 superimposed on top of a large portion of the existing Rent-A-Car facilities. The Runway 5-23 extension also brings with it the relocation of the commuter terminal and commuter parking area where Rent-A-Car Facilities now exist. The Rent-A-Car facilities must be relocated if Runway 5-23 is to be lengthened. See the "Preferred Plan" in the Update. 14-7

The extension of Runway 5-23 to 7,000 feet necessitates the closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility. The closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility are "necessary precedents" for a larger project, the extension of Runway 5-23 to 7,000 feet. The closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility are "phases or increments" of a larger total undertaking, the extension of Runway 5-23 to 7,000 feet. The DEA does not discuss ConRAC as it relates to the Update or, in particular, to any plan to extend Runway 5-23. Section 3.11 is included in the DEA purportedly to describe "reasonably foreseeable future actions." Again, the DEA neglects to mention the Preferred Plan of extending Runway 5-23 to 7,000 feet and hence neglects to address the cumulative and long-term impacts resulting from this proposed action. There is absolutely no discussion in the DEA about how these are "connected" actions. 14-8

HDOT-A agrees that an EIS is required by law to review and analyze the environmental impacts of all of the projects proposed in the Update in order to assess their long term and cumulative impacts. The DEA for the ConRAC facility is inadequate because it fails to analyze the environmental impacts of the proposed ConRAC facility within the context of the other projects proposed in the Preferred Plan presented in the Update. 14-9

D. THE DEA FAILS TO ADDRESS PHASED ACTIONS THAT ARE REQUIRED TO BE TREATED AS SINGLE ACTIONS

Hawaii's "Environmental Impact Statement Rules" include §11-200-7 entitled "Multiple or Phased Applicant or Agency Actions" which provides as follows: 14-10

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[1] http://kahuluiairport.rmtowill.com/wp-content/uploads/2012/03/KAHULUI_AIRPORT_MASTER_PLAN_AND_NCP_Mar_13_2012.pdf

A group of actions proposed by an agency or an applicant shall be treated as a single action when:

A. The component actions are phases or increments of a larger total undertaking;
B. An individual project is a necessary precedent for a larger project;
C. An individual project represents a commitment to a larger project; or
D. The actions in question are essentially identical and a single statement will adequately address the impacts of each individual action and those of the group of actions as a whole.

In *Sierra Club v. Department of Transportation of the State of Hawai'i* ("Sierra Club I"), 115 Haw. 299, 167 P.3d 292 (2007) the Hawaii Supreme Court explained the purpose of this Rule:

> Rules like HAR § 11-200-7 are meant to keep applicants or agencies from escaping full environmental review by pursuing projects in a piecemeal fashion. See Guidebook at 19 ("The proposed action must be described in its entirety and cannot be broken up into component parts which, if each is taken separately, may have minimal impact on the environment. Segmenting a project in this incremental way to avoid the preparation of an environmental impact statement is against the law."); Kenneth A. Manaster & Daniel P. Selmi, 2 State Environmental Law § 13.10 (2006) (discussing the problem of "segmentation" or "piecemealing" of projects, including "situations . in which the agency tries to mask the full nature of its project or divides up what is clearly a larger action into smaller pieces that will be implemented simultaneously," "where a private applicant plainly has definite plans for additional, related projects in the future," or where "a project unquestionably will give rise to later, secondary actions by other individuals[.]").

14-10 cont.

This DEA is based upon illegal segmentation and piecemealing to avoid the preparation of an EIS and by attempting to mask the full nature of its project.

E. THE DEA NEGLECTS TO ADDRESS SECONDARY IMPACTS

The duty to study "secondary impacts" is also addressed in *Sierra Club v. Department of Transportation of the State of Hawai'i* ("Sierra Club I"), 115 Haw. 299, 167 P.3d 292 (2007). The Hawaii Supreme Court relied upon *McGlone v. Inaba,* 64 Haw. 27, 636 P.2d 158 (1981), and *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846 (9th Cir.2005). The Hawaii Supreme Court ruled:

14-11

McGlone makes clear that in making this determination, the agency must consider not just the effect of an action on the direct site to which the exemption applies (the "primary impact"), but also secondary impacts that are "incident to and a consequence of the primary impact."

14-11 cont.

This DEA fails to study secondary impacts as well. The proposal to extend Runway 5-23 to 7,000 feet necessitates the closing and relocation of the existing Rent-A-Car facilities. The impacts of both projects must be addressed at the same time. The DEA improperly has limited its scope to the primary impacts of the ConRAC facility alone.

F. THE DESCRIPTION OF THE "NO ACTION' ALTERNATIVE IS INADEQUATE

The DEA includes a "no action" alternative – described as "no changes to the existing rental car facilities at OGG would be implemented." See § 2.3.2.1. The necessity to relocate these facilities if Runway 5-23 is lengthened to 7,000 feet is never mentioned. Any "hard look" at the "no action" alternative would need to include an acknowledgment that the existing Rent-A-Car facilities must be closed and relocated if Runway 5-23 is to be extended to 7,000 feet. NEPA and HEPA require that alternatives — including the no action alternative — be given full and meaningful consideration. *Bob Marshall Alliance v. Hodel*, 852 F. 2d 1223 (9th Cir.1988). This "no action" alternative is meaningless without a full description of this alternative.

14-12

G. IMPACTS THAT THE DEA FAILS TO ADDRESS

1. Adverse Aircraft Noise Impacts Imposed Upon Kahului Residents

In extending Runway 5-23 to 7,000 feet, HDOT-A has stated that the runway will then be available for use by larger, noisier aircraft. The increase in severe adverse noise impacts that this extension will impose upon Kahului residents have not been studied and must be addressed and mitigated first.

14-13

2. Adverse Aircraft Noise Impacts Imposed Upon Spreckelsville Residents

The extension of Runway 5-23 to 7,000 feet will also impose greater adverse noise impacts upon Spreckelsville residents. These impacts have not been studied and must be addressed and mitigated first.

3. Adverse Impacts Imposed Upon Kanaha Wildlife Sanctuary

The proposed extension of Runway 5-23 to 7,000 feet will, in part, be in the direction of the Kanaha Wildlife Sanctuary thereby increasing adverse aircraft noise impacts upon the wildlife protected by this Sanctuary. These impacts have not been studied and must be addressed and mitigated first.

4. Adverse Impacts on Recreational Users of Kanaha Beach Park

14-13 cont.

In extending Runway 5-23 to 7,000 feet, HDOT-A has stated that the runway will then be available for use by larger, noisier aircraft. Runway 5-23 is adjacent to Kanaha Beach Park. The increase in adverse noise impacts that this extension will impose upon users of Kanaha Beach Park and to recreational uses facilitated by the Park have not been studied and must be addressed and mitigated first.

H. THE SIGNIFICANCE CRITERIA HAVE BEEN IMPROPERLY APPLIED

The Environmental Council has promulgated regulations on when proposed actions "may" have a significant effect on the environment. HAR 11-200-9 through 13, Subchapter 6, entitled "Determination of Significance." This Subchapter contains HAR § 11-200-12, entitled "Significance Criteria."

An agency is required to consider ".... the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action....[and] .... every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action." HAR § 11-200-12.A and B.

In addition, as is pertinent, according to HAR § 11-200-12.B., in most instances, an action shall be determined to have a significant effect on the environment if it:

14-14

1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;
2. **Curtails the range of beneficial uses of the environment;**
3. Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;
4. Substantially affects the economic welfare, social welfare, and cultural practices of the community or State;
5. Substantially affects public health;
6. Involves substantial secondary impacts, such as population changes or effects on public facilities;
7. **Involves a substantial degradation of environmental quality;**
8. **Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;**

9. Substantially affects a rare, threatened, or endangered species, or its habitat;
10. Detrimentally affects air or water quality or ambient noise levels;
11. Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

14-14 cont.

First, the "Significance Criteria" plainly mandate that HDOT-A is required to consider ".... the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action....[and] .... every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action." HAR § 11-200-12.A and B. The DEA fails to do this.

14-15

Second, the "Significance Criteria" require that "connected" actions be addressed. The DEA has failed to address the impacts resulting from the extension of Runway 5-23 to 7,000 feet, a clear connected action.

14-16

Third, once it is acknowledged that the proposed extension of Runway 5-23 to 7,000 feet is a connected action that must be addressed, there are multiple other "Significance Criteria" that are then in play that are not addressed in the DEA.

14-17

I. CONCLUSION

The DEA for the proposed ConRAC facility is inadequate as a matter of law and fact. Either HDOT-A must state in writing that it has abandoned its proposed project to lengthen Runway 5-23 to 7,000 feet or a full EIS must be prepared now addressing the environmental impacts of all connected actions together.

14-18

Sincerely yours,

Isaac Hall

Cc: Clients
Cc: Consultant:
Ricondo & Associates, Inc.
3239 Ualena Street, Third Floor
Honolulu, HI 96819
Contact: Stephen Culberson

RESPONSE TO COMMENT 14 (PC-01)

Response 14-1:

The Proposed Action analyzed in this EA is the development and operation of a consolidated rental car facility at Kahului Airport. The consolidated rental car facility would have no effect on the number or type of aircraft operations at the Airport and would not change the runway or airfield configuration. Thus, as stated in Section 4.1 of the EA, no change in aircraft noise would arise from development and operation of a consolidated rental car facility at Kahului Airport.

The Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 to 7,000 feet is only one of the alternatives the DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. However, alternatives to this project are still under study; despite what previous statements may have been made concerning the extension of Runway 5-23, there is no decision on a Runway 5-23 extension at this time. The project would be subject to environmental review under HRS 343 and the National Environmental Policy Act at such time that DOT-A and FAA agree that the planning required to identify and analyze feasible alternatives to the reconstruction of Runway 2-20 is sufficient to proceed.

Response 14-2:

As described in the response to Comment 14-1, the Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 is only one of the alternatives the DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. Alternatives to this project are still under study. Initial planning for the proposed ConRAC facility began in 2008 as part of the Statewide Car Rental Facilities Development Study conducted for Hawaii's major airports. Data collection, preliminary facility requirements, high-level concepts, and rough order-of-magnitude costs estimates were developed in 2009 and 2010 to determine financial feasibility. As part of the Statewide program, a site selection study conducted in 2011 identified potential feasible sites at Kahului Airport. Based on the current rental car facility requirements, growth in passenger enplanements and rental car demand, and projected future rental car facility requirements at Kahului Airport, DOT-A determined that implementation of a ConRAC facility at the Airport should proceed.

The EA identifies the purpose and need for the Proposed Action. The purpose of the Proposed Acton is to provide the necessary space for the on-Airport rental car companies to accommodate ready/return and quick turnaround facilities in a single location at the airport. The need for the proposed project is based on:

1) Providing adequate on-airport facilities for the rental car companies
2) Reducing traffic and congestion on the terminal roadway system
3) Enhancing the overall customer experience

The Proposed Action would result in the consolidation of most rental car operations into the ConRAC; however, the existing rental car facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the rental car facilities currently operate.

The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport.

Also, as described in the response to Comment 14-1, the Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 is only one of the alternatives the DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. Alternatives to this project are still under study.

Response 14-3:

FAA Order 5050.4B[1] defines connected actions as follows:

(1) Connected actions. These are actions that are closely related to the proposed action and should be discussed in the same EIS. These actions:
   a) May automatically trigger other actions requiring EAs or EIS;
   b) Cannot or will not occur unless other actions occur at the same time or earlier; and
   c) Are independent parts of a large action but depend on the larger action for justification.

As indicated in Response 14-2, the proposed project would result in the consolidation of most rental car operations into the ConRAC; however, the existing rental car facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the rental car facilities currently operate. The Proposed Action would not trigger other actions that are not already identified and discussed in the EA and it is not dependent on other actions occurring at the same time or earlier.

The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport. FAA Order 5050.4B states that "For purposes of this Order, a project has independent utility when the project has logical starting and end points and would have a useful purpose without relying on other transportation improvements."[2] Thus, the Proposed Action has independent utility from any potential runway improvements at Kahului Airport.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

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1 U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, April 28, 2006, Paragraph 905.c.1.

2 U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, April 28, 2006, Paragraph 202.c.(4)(a).

Response 14-4:

Comment noted. The Purpose and Need for the Proposed Action are described in Chapter 1 of the EA.

Response 14-5:

Comment noted. Chapter 4 of the EA identifies the potential effects of the Proposed Action and reasonable alternatives, as required by HRS § 343 and the National Environmental Policy Act. Chapter 5.2 of the EA contains a significance criteria assessment for the Proposed Action, as required by HRS § 343.

The DOT-A is anticipating finding that the Proposed Action will not have a significant effect on the environment based on the findings and reasons set forth in the EA. HAR Section 11-200-10 provides that the agency (anticipated) determination and the findings and reasons supporting the (anticipated) determination be included in the EA.

Response 14-6:

As previously noted in response to Comments 14-2 and 14-3, the ConRAC facility would meet the stated purpose and need outlined in the EA document and is not dependent on the extension of Runway 5-23 or other projects to meet said objectives.

The Kahului Airport Master Plan Update referenced in the letter has not been completed. The document the commentator is referring to is a public presentation that was given by HDOT-A as part of the Master Plan Update process to solicit comments and input on the projects being considered as part of the Master Plan Update Study. Although the presentation refers to a Preferred Plan that includes extension of Runway 5-23, relocation of the rental car facilities, relocation of the commuter terminal, terminal expansion to the north, Lanui (Loop Road) reconfiguration, expansion of public and employee parking, expanded security road network, etc., the Master Plan Update for Kahului Airport has not been completed and a final recommended plan has not been agreed upon by HDOT-A nor presented to FAA. Additionally, the presentation identifies potential improvements for implementation between 2015 and 2035; the timing of the different projects will depend on demand, funding, and obtaining the necessary environmental and FAA approvals.

Response 14-7:

See response to Comments 14-2 and 14-6. As noted in the response to Comment 14-2, the existing rental car facilities would be maintained for heavy maintenance, overflow storage and administrative functions. The Proposed Action does not include demolition, relocation, or removal of these functions from the existing areas.

Response 14-8:

At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway

5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Because removal of the existing rental car facilities is not part of the Proposed Action nor is it required for the implementation of the Proposed Action, those actions are properly not analyzed in this EA.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

Response 14-9:

Each project that HDOT-A proposes to implement at Kahului Airport will need to undergo environmental review and analysis in compliance with HRS § 343 and the National Environmental Policy Act. As stated in the response to Comment 14-3, the proposed ConRAC facility project is a project that has independent utility; it does not depend on other projects for implementation.

Response 14-10:

As stated in the responses to Comments 14-2 and 14-3, the purpose and need for the ConRAC facility are defined and are not dependent on any other project. Additionally, as described in the response to Comment 14-6, the Kahului Airport Master Plan Update has not been completed, no decision has been made on a Runway 5-23 extension, and the Proposed Action is proposed regardless of whether Runway 5-23 is extended. The Proposed Action would result in the consolidation of most rental car operations into the ConRAC facility; however, the existing rental car area and facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the existing rental car facilities operate. There will still be rental car facilities in place after the Proposed Action that a Runway 5-23 extension would have to take into account at the time any such extension is proposed and reviewed. The Proposed Action would not trigger other actions that are not already identified and discussed in the EA and it is not dependent on other actions occurring at the same time or earlier.

The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway 5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Because removal of the existing rental car facilities is not part of the Proposed Action nor is it required for the implementation of the Proposed Action, those actions are properly not analyzed in this EA.

Response 14-11:

See responses to Comments 14-2, 14-3, and 14-6. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway 5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Those effects would be true secondary impacts, and would be analyzed as such in the appropriate environmental document. The extension of Runway 5-23 is not incident to or a consequence of the Proposed Action.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

Response 14-12:

See responses to Comments 14-2, 14-3, and 14-6. The Council on Environmental Quality (CEQ) states "The No Action alternative would mean the proposed activity would not take place, and the resulting environmental effects from taking no action would be compared with the effects of permitting the proposed activity or an alternative activity to go forward." The No Action alternative includes all approved projects (i.e., those actions that are reasonably foreseeable as being implemented). Because the extension of Runway 5-23 has not been approved at the federal, State, or local level, it is not a reasonably foreseeable project that should be included as part of the No Action alternative. Rather it is a project that may occur in the future, if the appropriate federal, State, and local environmental reviews are undertaken and approvals obtained.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

Response 14-13:

See response to Comment 14-6. The extension of Runway 5-23 is not part of the Proposed Action. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives.

Response 14-14:

A Significance Criteria Assessment in compliance with HRS § 343 is included in Section 5.2.

Response 14-15:

A Significance Criteria Assessment in compliance with HRS § 343 is included in Section 5.2.

Response 14-16:

As stated in the responses to Comments 14-2, 14-3 and 14-6, the extension of Runway 5-23 is not a connected action to the Proposed Action.

Response 14-17:

See response to Comments 14-2, 14-3, 14-6, and 14-16. The extension of Runway 5-23 to 7,000 feet is one option DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. However, alternatives to this project are still under study. The project would be subject to environmental review under HRS 343 and the National Environmental Policy Act at such time that DOT-A and FAA agree that the planning required to identify and analyze feasible alternatives for the reconstruction of Runway 2-20 is sufficient to proceed.

Response 14-18:

See response to Comments 14-2, 14-3, 14-6, and 14-16.

Comment Letter No.
PC02

Hawaiian Telcom

Received
APR 01 2013

March 27, 2013

RIcondo & Associates
3239 Ualena Street, Third Floor
Honolulu, HI 96819-1919

Attention: Ura Quoniou

Subject: Consolidated Rental Car Facility
Kahului Airport
Draft EA

Dear Brett,

Thank you for allowing us to review and comment on the subject project. Your plans have been received and put on file.

Hawaiian Telcom, Inc. has no comment, nor do we require any additional information at this time. 15-1

Should you require further assistance, please call me at 242-5107.

Sincerely,

Tom Hutchison
OSP Engineer

cc: Gerry Saguicio, Section Manager

BICS File No. 1303-008 (3030)

RESPONSE TO COMMENT 15 (PC-02)

Response 15-1:

Comment noted.

Comment Letter No.
PC03

Hawaiian Telcom

Network Engineering and Planning
OSP Engineering - Maui
60 South Church St.
Wailuku, HI 96793
Phone 808 242-5102
Fax 808 242-8899

August 22, 2012

State of Hawaii
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

Attention: Mr. Gene Matsushige

Subject: Roadway Improvement and ConRAC Facility
Kahului Airport
State Project No. AM1032-13

Dear Gene,

Thank you for allowing us to review and comment on the subject project. Your plans have been received and put on file.

Hawaiian Telcom, Inc. has no comment, nor do we require any additional information at this time.] 32-1

Should you require further assistance, please call me at 242-5107.

Sincerely,

Tom Hutchison
OSP Engineer

cc: Gerry Sagucio, Section Manager

BICS File No. 1208-037 (3030)

RESPONSE TO COMMENT 32 (PC-03)

Response 32-1:

Comment noted.

Maui Electric Company, Ltd.•210 West Kamehameha Avenue•P. O. Box 398•Kahului, Maui, HI 96733-0698•(808) 871-8461

Comment Letter No.
PC04

October 29, 2012

Mr. Gene Matsushige, Airports Division
Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport
Kahului, Maui, Hawaii

Dear Mr. Matsushige,

Thank you for allowing us to comment on the subject project.

In reviewing our records and the information received, Maui Electric Company (MECO), we highly encourage the customer's electrical consultant to submit the electrical demand requirements and project time schedule as soon as practical so that we can properly evaluate the impact to our facilities and provide service on a timely basis. In addition, we highly encourage the customer to contact Steven Rymsha at 872-3292 of our Renewable Energy Department for any interconnection requirements as necessary to accommodate the customer's photovoltaic (PV) system. 33-1

Should you have any questions or concerns, please feel free to contact Kelcie Kawamura at 872-3246.

Sincerely,

Ray Okazaki
Supervisor, Engineering

RESPONSE TO COMMENT 33 (PC-04)

Response 33-1:

Comment noted. DOT-A will coordinate electrical demands for the project as the design for the proposed ConRAC facility progresses.

AFFIDAVIT OF PUBLICATION

STATE OF HAWAII, }
County of Maui. } ss.

Rhonda M. Kurohara being duly sworn deposes and says,that she is in Advertising Sales of the Maui Publishing Co., Ltd., publishers of THE MAUI NEWS, a newspaper published in Wailuku, County of Maui, State of Hawaii; that the ordered publication as to

NOTICE OF AVAILABILITY

of which the annexed is a true and correct printed notice, was published 1 times in THE MAUI NEWS, aforesaid, commencing on the 8th day of March, 2013, and ending on the 8th day of March, 2013, (both days inclusive), to-wit: on

March 8, 2013

and that affiant is not a party to or in any way interested in the above entitled matter.

This 1 page Notice of Availability, dated March 8, 2013, was subscribed and sworn to before me this 8th day of March, 2013, in the Second Circuit of the State of Hawaii, by Rhonda M. Kurohara.

Kathleen M Piimauna
Notary Public, Second Judicial Circuit, State of Hawaii

KATHLEEN M. PIIMAUNA
My commission expires 7/5/13

KATHLEEN M. PIIMAUNA NOTARY PUBLIC No. 93-353 STATE OF HAWAII

NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL ASSESSMENT

Pursuant to Title 49, United States Code, §47106(c)(1)(A), notice is hereby given that the State of Hawaii, Department of Transportation - Airports (HDOT-A), proposes to implement a Consolidated Rental Car Facility at Kahului Airport (OGG), Maui, Hawaii. The purpose of the proposed project is to provide the necessary space for the on-Airport rental car companies to accommodate most rental car operations in a single location on the Airport. Excess rental car storage, dealer preparation, and heavy maintenance would continue to be accommodated at the existing rental car facility locations on the Airport.

The proposed improvements include a Customer Service Building where all rental car company counters and administrative offices would be located; Ready/Return structure for rental car staging and storage; rental car pick up and return, and airport and car rental employee parking; Quick Turnaround Area (QTA) for refueling, light maintenance, and washing of rental cars; four 15,000 gallon fuel storage tanks (below grade vaulted containment system); trolley/shuttle to/from the passenger terminal area; roadway connections to the airport terminal roadway system; connections to existing utilities; and photovoltaic panels on the roof of the ready/return structure (installation by others). A Draft Environmental Assessment (EA) of the economic, social, and environmental impacts of the proposed development has been prepared.

The Draft EA evaluates the potential environmental effects of the Proposed Action described above and has been prepared pursuant to the requirements of Section 102(2)(C) of the National Environmental Policy Act of 1969 (NEPA), and Section 509(b)(5) of the Airport and Airway Improvement Act of 1982, as amended. The Draft EA has also been prepared pursuant to Hawaii Revised Statutes (HRS), Chapter 343. The FAA is the lead federal agency to ensure compliance with NEPA for airport development actions. HDOT-A is the lead state agency to ensure compliance with HRS Chapter 343. The EA has also been prepared in accordance with FAA Order 1050.1E, Environmental Impacts: Policies and Procedures; and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions. Pursuant to the federal Endangered Species Act, Clean Water Act, Clean Air Act, and National Historic Preservation Act, the Draft EA includes an analysis of prudent or feasible alternatives analysis, potential impacts, and mitigation measures, as appropriate.

Beginning on March 8, 2013, the Draft EA will be available for public review at:

http://oeqc.doh.hawaii.gov/

or at the following locations during normal business hours:

Federal Aviation Administration
Honolulu Airports District Office
300 Ala Moana Boulevard, Suite 7-128
Honolulu, Hawaii 96850

State of Hawaii, Department of Transportation
Airports Division, Honolulu International Airport
400 Rodgers Boulevard, 7th Floor
Honolulu, Hawaii 96819

Hawaii State Library, 478 South King Street
Honolulu, Hawaii 96813

Kahului Public Library, 90 School Street
Kahului, Hawaii 96732

Comments must be received by 5:00 p.m. Hawaii Time on Monday, April 8, 2013. Please ensure adequate time for mailing. Comments received on the Draft EA and the responses to those comments will be disclosed in the Final EA.

Written comments on the adequacy of the information disclosed in the Draft EA may be submitted by mail or facsimile to:

Hawaii Department of Transportation
Attention: Jeffrey Chang, Engineering Program Manager
DOT-Airports Division (AIR-EP), Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, Hawaii 96819
Telephone: 808/838-8835
Fax: 808/838-8753

AFFIDAVIT OF PUBLICATION

IN THE MATTER OF
NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL ASSESSMENT

STATE OF HAWAII }
} SS.
City and County of Honolulu }

Doc. Date: MAR - 8 2013 **# Pages:** 1

Notary Name: Patricia K. Reese First Judicial **Circuit**

Doc. Description: Affidavit of Publication

PATRICIA K. REESE NOTARY PUBLIC Comm. No. 86-467 STATE OF HAWAII

Notary Signature MAR - 8 2013 Date

Rose Rosales being duly sworn, deposes and says that she is a clerk, duly authorized to execute this affidavit of Oahu Publications, Inc. publisher of The Honolulu Star-Advertiser and MidWeek, that said newspapers are newspapers of general circulation in the State of Hawaii, and that the attached notice is true notice as was published in the aforementioned newspapers as follows:

Honolulu Star-Advertiser 1 times on:
03/08/2013

Midweek Wed. 0 times on:

_____ times on:

And that affiant is not a party to or in any way interested in the above entitled matter.

Rose Rosales

Subscribed to and sworn before me this 8th day

of MARCH A.D. 2013

Patricia K. Reese, Notary Public of the First Judicial Circuit, State of Hawaii

My commission expires: Oct 07 2014

PATRICIA K. REESE NOTARY PUBLIC Comm. No. 86-467 STATE OF HAWAII

Ad # 0000499522 LN: _____

NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL ASSESSMENT

Pursuant to Title 49, United States Code, § 47106(c)(1)(A), notice is hereby given that the State of Hawaii, Department of Transportation - Airports (HDOT-A), proposes to implement a Consolidated Rental Car Facility at Kahului Airport (OGG), Maui, Hawaii. The purpose of the proposed project is to provide the necessary space for the on-Airport rental car companies to accommodate most rental car operations in a single location on the Airport. Excess rental car storage, dealer preparation, and heavy maintenance would continue to be accommodated at the existing rental car facility locations on the Airport.

The proposed improvements include a Customer Service Building where all rental car company counters and administrative offices would be located; Facility/Return structure for rental car staging and storage, rental car pick up and return, and airport and car rental employee parking; Quick Turnaround Area for refueling, light maintenance, and washing of returned rental cars; four 15,000 gallon fuel storage tanks (below-grade vaulted containment system); trolley/shuttle to/from the passenger terminal area; roadway connections to the airport terminal roadway system; connections to existing utilities; and flat-plate photovoltaic panels on the roof of the ready/return structure (installation by others). A Draft Environmental Assessment (EA) of the economic, social, and environmental impacts of the proposed development has been prepared.

The Draft EA evaluates the potential environmental effects of the Proposed Action described above and has been prepared pursuant to the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA), and Section 509(b)(5) of the Airport and Airway Improvement Act of 1982, as amended. The Draft EA has also been prepared pursuant to Hawaii Revised Statutes (HRS), Chapter 343. The FAA is the lead federal agency to ensure compliance with NEPA for airport development actions. HDOT-A is the lead state agency to ensure compliance with HRS Chapter 343. The EA has also been prepared in accordance with FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*; and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. Pursuant to the federal Endangered Species Act, Clean Water Act, Clean Air Act, and National Historic Preservation Act, the Draft EA includes an analysis of prudent or feasible alternatives analysis, potential impacts, and mitigation measures, as appropriate.

Beginning on March 8, 2013, the Draft EA will be available for public review at:

http://oeqc.doh.hawaii.gov/

or at the following locations during normal business hours:

- Federal Aviation Administration, Honolulu Airports District Office, 300 Ala Moana Boulevard, Suite 7-128, Honolulu, Hawaii 96850
- State of Hawaii, Department of Transportation, Airports Division, Honolulu International Airport, 400 Rodgers Boulevard, 7th Floor, Honolulu, Hawaii 96819
- Hawaii State Library, 478 South King Street, Honolulu, Hawaii 96813
- Kahului Public Library, 90 School Street, Kahului, Hawaii 96732

Comments must be received by 5:00 p.m. Hawaii Time on Monday, April 8, 2013. Please assure adequate time for mailing. Comments received on the Draft EA and the responses to these comments will be disclosed in the Final EA.

Written comments on the adequacy of the information disclosed in the Draft EA may be submitted by mail or facsimile to:

Hawaii Department of Transportation
Attention: Jeffrey Chang, Engineering Program Manager
DOT-Airports Division (AIR-EP) Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, Hawaii 96819
Telephone: 808/838-8838
Fax: 808/838-8753

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.
(SA499522 3/8/13)

Appendix J

HRS 343 HDOT-A Response Letters to Comments Received

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0249

July 19, 2013

Mr. George P. Young, P.E.
Chief, Regulatory Branch
Department of the Army
U.S. Army Engineer District, Honolulu
Fort Shafter, Hawaii 96858-5440

Dear Mr. Young:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13 .

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility (reference number **POH-2012-00170**). This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division on April 1, 2013 (letter dated March 27, 2013). Attached please find your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AF-01

APR 0 1 2013

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, HONOLULU
FORT SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF:

March 27, 2013

Regulatory Branch

File Number **POH-2012-00170**

Munekiyo & Hiraga, Inc.
Attention: Ms. Karlynn Fukuda
305 High Street, Suite 104
Wailuku, Hawaii 96793

Dear Ms. Fukuda:

This responds to your March 6, 2013 letter requesting Department of the Army (DA) review comments on the draft environmental assessment (EA) and Special Management Area Use (SMAU) permit application for the proposed Kahului Airport Consolidated Rental Car Facility (ConRac) at TMK 238001019 (por) and 238001239 located in Kahului, Maui Isle, Hawaii. This project is assigned reference number **POH-2012-00170.** Please cite this reference number in any future correspondence concerning this project. 1-1

We have completed our review of the submitted document pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C 403) (Section 10) and Section 404 of the Clean Water Act (33 U.S.C. 1344) (Section 404). Section 10 requires that a DA permit be obtained from the U.S. Army Corps of Engineers (Corps) prior to undertaking any work activity occurring in, over, or under and affecting navigable waters of the U.S. For tidal waters, the shoreward limit of the Corps' jurisdiction extends to the Mean High Water (MHW) elevation. Section 404 requires that a DA permit be obtained for the discharge (placement) of dredged and/or fill material into waters of the U.S., including wetlands. For tidally influenced waters, in the absence of adjacent wetlands, the shoreward limit of the Corps' jurisdiction extends to the High Tide Line (HTL) elevation, which in Hawai'i may be approximated by reference to the Mean Higher High Water (MHHW) elevation. For non-tidal waters, the lateral limits of the Corps' jurisdiction extend to the Ordinary High Water Mark (OHWM) or the approved delineated boundary of any adjacent wetlands. 1-2

Based on the submitted information and available resources, we have identified the following aquatic resources, which may be subject to the Corps' regulatory jurisdiction, present within and adjacent to the Kahului Airport boundary: 1) Kanaha Pond and Wildlife Sanctuary; 2) Kalianui Gulch; 3) an unnamed Corps-verified wetland (Corps letter dated February 28, 2013); and 4) the Pacific Ocean. Once a project alternative is selected for development, we recommend you submit the proposed project plans for our review and request a DA permit determination. 1-3

Thank you for providing us with the opportunity to comment. Should you have any questions, please contact Ms. Joy Anamizu by phone at (808) 835-4308, fax (808) 835-4126, or via e-mail at *Joy.N.Anamizu@usace.army.mil*. You are encouraged to provide comments on 1-4

your experience with the Honolulu District Regulatory Branch by accessing our web-based customer survey form at *http://per2.nwp.usace.army.mil/survey.html*.

1-4 cont.

Sincerely,

George P. Young, P.E.
Chief, Regulatory Branch

Copy furnished:
Jeffery Chang, DOT-Airports Division, jeff.chang@hawaii.gov
Paul Fasi, County of Maui, Department of Planning

RESPONSE TO COMMENT 1 (AF-01)

Response 1-1:

Comment noted.

Response 1-2:

Please see Section 3.7.2, "Water Resources", Section 3.7.3, "Wetlands", and Section 3.7.5, "Coastal Areas" for a discussion of the wetland and coastal resources in the vicinity of the Airport. The Alternative 5 site lies on 16.7 acres of undeveloped land, as well as land with temporary structures (UPS package processing facility). This site is slightly concave in shape, with the lowest elevations situated alongside the Kalialinui Stream channel, which passes directly under the site in a buried concrete aqueduct. Kalialinui Stream, which is the only aquatic resource on or near the Alternative 5 site, was evaluated for its potential to be included in Waters of the United States. The "relevant reach" of Kalialinui Stream stretches upstream from the "Traditional Navigable Water," the Pacific Ocean, for 16,000 linear feet to just below the Haiku Ditch at 180 feet above msl where the first small unnamed tributary flows into Kalialinui Stream. This stretch of Kalialinui Stream was found to be an ephemeral stream, a "Non-Relatively Permanent Water", without adjacent wetlands. Using a significant Nexus Determination analysis, Kalialinui Stream was found to be included in the jurisdictional Waters of the United States. The reach of the Kalialinui Stream that crosses the Proposed Action site is buried in a concrete aqueduct that would not be affected by construction or operation of the proposed ConRAC facility; thus, there would be no impact to jurisdictional Waters of the United States.

Response 1-3:

Please see Section 3.7.2, "Water Resources", Section 3.7.3, "Wetlands", and Section 3.7.5, "Coastal Areas" for a discussion of the wetland and coastal resources in the vicinity of the Airport. A wetland survey of the Alternative 4 and 5 sites was conducted to determine whether any wetland or jurisdictional Waters of the United States are present within either site. No wetlands were found on either the Alternative 4 or Alternative 5 site and both sites were determined to consist of entirely non-wetland uplands, as defined by the U.S. ACE. The selected alternative, Alternative Site 5, would have no effect on these resources. The Kalialinui Stream [Gulch] traverses Alternative Site 5 in an underground culvert, which would be protected and maintained throughout construction and operation of the proposed ConRAC facility.

Response 1-4:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0266

July 19, 2013

Mr. Gregor Blackburn
U.S. Department of Homeland Security
FEMA Region IX
Floodplain Management and Insurance Branch
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Dear Mr. Blackburn:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division dated March 12, 2013. Attached please find your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AF-02

E-13.011
EA-13.0080

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

March 12, 2013

Jeffrey Chang
Engineering Program Manager
State of Hawaii, Department of Transportation
Airport Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Chang:

This is in response to your request for comments on Draft Environmental Assessment (EA) and Special Management Area Use Permit Application for Proposed Kahului Airport Consolidated Rental Car Facility (ConRAC) at TMK (2) 3-8-001:019 (por.) and 239, Kahului, Maui, Hawaii.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Maui (Community Number 150003), Maps revised September 19, 2012. Please note that the County of Maui, Hawaii is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65. 2-1

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map. 2-2

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways. 2-3

Comment Letter No.
AF-02

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components. 2-4

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm. 2-5

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Maui County floodplain manager can be reached by calling Francis Cerizo, FPA, Staff Planner, at (808) 270-7771. 2-6

If you have any questions or concerns, please do not hesitate to call Sarah Owen of the Mitigation staff at (510) 627-7050.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Francis Cerizo, FPA, Staff Planner, Maui County
Carol L. Tyau-Beam, NFIP State Coordinator, HI Department of Land & Natural Resources
Sarah Owen, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

RESPONSE TO COMMENT 2 (AF-02)

Response 2-1:

The updated September 2012 Flood Insurance Rate Map is provided in Section 3.7.4, "Floodplains" and the text was revised to discuss potential effects to floodplains based on that map. DOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. DOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.

Response 2-2:

The proposed ConRAC facility would be constructed so that the lowest occupied floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map for the area. Section 4.9, "Floodplains" has been revised to describe the building in relation to the Base Flood Elevation.

Response 2-3:

DOT-A completed a drainage study in May 2012 of the Kalialinui Stream downstream of the proposed ConRAC site for the Airport Fuel Farm project. This drainage study determined that the proposed ConRAC site is outside of the floodway. DOT-A is in the process of submitting a Letter of Map Revision to Maui County Planning to update the Flood Insurance Rate Map in this area.

Response 2-4:

All structures associated with the Proposed Action would be constructed outside of "V" Flood Zones delineated on the FIRM, outside of coastal high hazard areas.

Response 2-5:

Comment noted. DOT-A would submit hydrologic and hydraulic data corresponding to any changed conditions within the 100-year floodplain associated with Kalialinui Gulch within six months of completion of the ConRAC project.

Response 2-6:

Comment noted. DOT-A is coordinating with the Maui County Planning Department on potential effects to the 100-year floodplain. Following discussions with the County Planning Department, an application for a Letter of Map Revision (LOMR) will be filed by the DOT-A or its consultants in the near future for the Kahului Airport area. The County Planning Department noted that the LOMR would amend the existing flood designations for the Kahului Airport area, including the proposed project site. DOT-A will continue to coordinate with the Planning Department on the LOMR application.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0276

July 19, 2013

Ms. Ranae Ganske-Cerizo
District Conservationist
Natural Resources Conservation Service
77 Ho'okele Street, Suite 202
Kahului, Hawaii 96732

Dear Ms. Grasko-Cerizo:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. The Hawaii Department of Transportation - Airports Division received your letter via fax on March 14, 2013, which noted that you had no comments on the Draft Environmental Assessment. A copy of your comment letter and our response are attached and will be included in the Final Environmental Assessment

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AF-03

United States Department of Agriculture

NRCS
Natural Resources Conservation Service
77 Ho'okele Street, Suite 202
Kahului, HI 96732
Phone 808-871-5500
Fax 808-873-6184

March 14, 2013
Via Fax 808-838-8753

Mr. Jeffrey Chang, Engineering Program Manager
Hawaii Department of Transportation
DOT – Airports Division (AIR-EP), Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, HI 96819

Subject: Draft Environmental Assessment
Consolidated Rental Car Facility, Kahului Airport

Dear Mr. Chang:

I have no comments at this time. 3-1

Sincerely,

Ranae Ganske-Cerizo
District Conservationist

RESPONSE TO COMMENT 3 (AF-03)

Response 3-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0279

July 19, 2013

TO: KENNETH G. MASDEN II, PUBLIC WORKS MANAGER
PLANNING SECTION, FACILITIES DEVELOPMENT BRANCH
DEPARTMENT OF EDUCATION

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. The Hawaii Department of Transportation - Airports Division received your letter on April 11, 2013 (letter dated March 25, 2013), which noted that you had no comments on the Draft Environmental Assessment. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

Comment Letter No.
AS-01

NEIL ABERCROMBIE
GOVERNOR

KATHRYN S. MATAYOSHI
SUPERINTENDENT

Received
APR 11 2013

STATE OF HAWAI'I
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAI'I 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

March 25, 2013

TO: Airports Division (AIR-EP), Engineering Branch
Department of Transportation

ATTN: Mr. Jeffrey Chang, Engineering Program Manager

FROM: Kenneth G. Masden II, Public Works Manager
Planning Section, Facilities Development Branch

SUBJECT: **Draft Environmental Assessment, Consolidated Rental Car Facility, Kahului Airport, Kahului, Hawaii, Project No. AS1062-02**

The Department of Education (DOE) has reviewed the Draft Environmental Assessment for the Consolidated Rental Car Facility at Kahului Airport dated March 2013.

The DOE has no comment to offer regarding this project. 4-1

Thank you for the opportunity to provide comments. If you have any questions, please call Roy Ikeda of the Facilities Development Branch at 377-8301.

KGM:jmb

c: Raymond L'Heureux, Assistant Superintendent, OSFSS

RESPONSE TO COMMENT 4 (AS-01)

Response 4-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0280

July 19, 2013

TO: LAURA LEIALOHA PHILLIPS MCINTYRE
MANAGER, ENVIRONMENTAL PLANNING OFFICE
DEPARTMENT OF HEALTH

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment (EA) for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division. We received your scoping comment letter dated August 3, 2012 (reference file: **12-138 EA Kahului Airport**), your transmittal letter dated March 4, 2013, and your Draft EA comment letter dated March 8, 2013 (file: **13-055 Rental Car Facility**). Attached please find a copy of your three comment letters and our responses, which are included in the Final EA.

Your letter dated March 8, 2013, requested confirmation of all letters received from the Hawaii Department of Health regarding the proposed project. In addition to your three letters, we received the following letters from the Department of Health:

- Patti Kitkowski, District Environmental Health Program Chief, Maui District Health Office – Scoping comment letter dated August 6, 2012, and Draft EA comment letter dated March 19, 2013
- Alec Wong, P.E., Chief, Clean Water Branch – Draft EA comment letter dated May 24, 2013
- Jeffrey M. Eckerd, Program Manager, Indoor and Radiological Health Branch – Draft EA comment letter dated June 3, 2013

These letters and our responses are also included in the Final EA. Thank you again for your participation.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

Comment Letter No.
AS-02

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

13-055
Rental Car Facility

March 8, 2013

Received
MAR 13 2013

Mr. Ura Quoniou
Ricondo & Associates
3239 Ualena Street
Third Floor
Honolulu, Hawaii 96819

Dear Mr. Quoniou:

SUBJECT: Draft Environmental Assessment, Consolidated Rental Car Facility, Kahului Airport

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter dated March 6, 2013. Thank you for allowing us to review and comment on the subject document. Your document was routed to the Clean Water and Indoor & Radiological Health Branches. They will provide specific comments to you if necessary. EPO recommends that you review the Standard Comments (www.hawaii.gov/health/epo under the land use tab). You are required to adhere to all Standard Comments specifically applicable to this application. 5-1

EPO suggests that you examine the many sources available on strategies to support the sustainable design of communities, including the:
U.S. Environmental Protection Agency's sustainability programs: www.epa.gov/sustainability
U.S. Green Building Council's LEED program: www.new.usgbc.org/leed 5-2

The DOH encourages everyone to apply these sustainability strategies and principles early in the planning and review of projects. We also request that for future projects you consider conducting a Health Impact Assessment (HIA). More information is available at www.cdc.gov/healthyplaces/hia.htm. We request you share all of this information with others to increase community awareness on sustainable, innovative, inspirational, and healthy community design. 5-3

We request a written response confirming receipt of this letter and any other letters you receive from DOH in regards to this submission. You may mail your response to 919 Ala Moana Blvd., Ste. 312, Honolulu, Hawaii 96814. However, we would prefer an email submission to epo@doh.hawaii.gov. We anticipate that our letter(s) and your response(s) will be included in the final document. If you have any questions, please contact me at (808) 586-4337. 5-4

Mahalo,

Laura Leialoha Phillips McIntyre, AICP
Manager, Environmental Planning Office

RESPONSE TO COMMENT 5 (AS-02)

Response 5-1:

Comment noted. The Standard Comments referenced in the comment letter were reviewed, as recommended. Responses to the Standard Comments are provided below.

- Hazard Evaluation and Emergency Response Office – no known release of petroleum, hazardous substances, pollutants, or contaminants has occurred on the site. The Proposed Action site was not formerly used for sugarcane production.
- Clean Air Branch – Measures to minimize fugitive dust would be incorporated into the construction plans, as discussed in Section 4.18, "Construction Impacts".
- Clean Water Branch – Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.
- Safe Drinking Water Branch – The Proposed Action would not affect public drinking water sources. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.
- Solid and Hazardous Waste Branch – Section 4.17, "Hazardous Materials, Pollution Prevention, and Solid Waste", discusses potential effects of the Proposed Action on hazardous materials and solid waste. The Proposed Action would not include underground storage tanks. Gasoline storage tanks associated with the proposed ConRAC facility would be aboveground, installed and operated in compliance with all federal, State, and local regulations.
- Wastewater Branch – The proposed ConRAC facility's restrooms and potable water would connect to the existing sewer system and would not generate significantly increased levels of wastewater. The car washing facilities would have a separate collection system that would include a recycling system to minimize the amount of wastewater generated by car washing activities. No wastewater from the car washing facilities would drain into the County sewer system.
- Noise, Radiation & Indoor Air Quality Branch – The proposed ConRAC facility would comply with the Administrative Rules of the Department of Health. Also, see response to Comment 7-2 concerning construction noise.

Response 5-2:

Comment noted. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 5-3:

Comment noted.

Response 5-4:

A written response confirming receipt of this letter was transmitted via email on March 18, 2013, from Ura Quoniou, Ricondo & Associates, Inc. In addition, all letters received on this project received a written response from DOT-A (see Appendix I).

Comment Letter No.
AS-03

MAR 28 2013

'ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director

COUNTY OF MAUI

DEPARTMENT OF PLANNING

TRANSMITTAL

March 4, 2013

	STATE AGENCIES
x	DAGS
x	DBEDT
x	Dept of AG, Honolulu
x	Dept of Hawaiian Homelands
x	Dept of Health, Honolulu
x	Dept of Health, Maui (2)
x	DLNR-Land, Maui
x	DLNR-Planning (5)
x	DLNR-SHPD, Maui
x	Office of Hawaiian Affairs
x	Office of Planning
	OTHER
x	Maui Electric Company

	COUNTY AGENCIES
x	Civil Defense
x	Dept of Environmental Management (2)
x	Dept of Public Works (3 Hard Copies)
x	Dept of Transportation
x	Dept of Water Supply
x	Fire & Public Safety
x	Police Department
x	Planning; Zoning Administration & Enforcement Division (ZAED)
	FEDERAL AGENCIES
x	FEMA
x	FAA
x	Fish & Wildlife
x	U.S. Army Corp. of Engineers (Hard Copy)

PROJECT:	**CONSOLIDATED RENTAL CAR FACILITY AT THE KAHULUI AIRPORT**
APPLICANT:	**State of Hawaii; Department of Transportation**
STREET ADDRESS:	**Kahului Airport, Kahului, Hawaii**
PROJECT DESCRIPTION:	**Consolidated parking structure for rental car companies**
TMK:	**(2) 3-8-001:019**
PERMIT NO.:	**SM1 2013/0002**

TRANSMITTED TO YOU ARE THE FOLLOWING:

x	Application(s)

THESE ARE TRANSMITTED AS CHECKED BELOW:

x	For your Comment and Recommendation

Please identify any comments you would like the Department of Planning (Department) to propose as conditions of project approval. Please also provide any previous comments, letters, etc. pertinent to this application. Submit your comments directly to me by **March 25, 2013**. A comment box is also provided to assist you. If no comment, please sign the "No Comment" box and fax to (808) 270-1775. Thank you for your time and assistance. For additional clarification, please contact me at paul.fasi@mauicounty.gov or at (808) 270-7814.

Sincerely,

PAUL F. FASI, Staff Planner

250 SOUTH HIGH STREET, WAILUKU, MAUI, HAWAII 96793
MAIN LINE (808) 270-7735; FACSIMILE (808) 270-7634
CURRENT DIVISION (808) 270-8205; LONG RANGE DIVISION (808) 270-7214; ZONING DIVISION (808) 270-7253

13-055

AGENCY NAME	State Dept. of Health Env. Planning Office	PHONE	808 586-4337

Attachment
xc: Clayton I. Yoshida, AICP, Planning Program Administrator (PDF)
Paul F. Fasi, Staff Planner (PDF)
Project File
General File
PFF:nt
K:\WP_DOCS\PLANNING\SM1\2013\0002_ConsolidatedRental\Staff Report to Approval\Agency Transmittal.doc

NO COMMENT			
Signed:	Laura McIntyre	Dated:	3/27/2013
Print Name:	Laura McIntyre	Title:	Manager, EPO

6-1

COMMENT/RECOMMENDATION BOX			
Signed:		Dated:	
Print Name:		Title:	

RESPONSE TO COMMENT 6 (AS-03)

Response 6-1:

Comment noted.

Comment Letter No.
AS-10

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

12-138
EA Kahului Airport

August 3, 2012

TO: Gene Matsushige
Engineering Branch, Department of Transportation

FROM: Laura McIntyre, Manager
Environmental Planning Office, Department of Health

SUBJECT: Environmental Assessment, Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13
Reference No. AIR-EC 12.0284

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter, dated **July 23, 2012.** Thank you for allowing us to review and comment on the subject document. The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time, but reserve the right to future comments. 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 application should be adhered to. 21-1

The United States Environmental Protection Agency provides a wealth of information on their website including strategies to help protect our natural environment and build sustainable communities at: http://water.epa.gov/infrastructure/sustain/ . The DOH encourages State and county planning departments, developers, planners, engineers and other interested parties to apply these strategies and environment principles whenever they plan or review new developments or redevelopments projects. We also ask you to share this information with others to increase community awareness on healthy, sustainable community design. If there are any questions about these comments please contact me by phone at 586-4337 or email: laura.mcintyre@doh.hawaii.gov. 21-2

C: Glenn M. Okimoto, Director of Transportation

RESPONSE TO COMMENT 21 (AS-10)

Response 21-1:

Comment noted. The Department's Standard Comments were reviewed (see response to Comment 5-1).

Response 21-2:

Comment noted. As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0283

July 19, 2013

TO: THE HONORABLE JESSE SOUKI
DIRECTOR, OFFICE OF PLANNING

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division. We received your scoping comment letter dated August 7, 2012 (reference number **P-13686**), and your Draft Environmental Assessment comment letter dated March 18, 2013 (reference number **P-13922**). Attached please find a copy of your two comment letters and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

Comment Letter No.
AS-06

MAR 20 2013

NEIL ABERCROMBIE
GOVERNOR

JESSE K. SOUKI
DIRECTOR
OFFICE OF PLANNING

OFFICE OF PLANNING
STATE OF HAWAII

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
Web: http://hawaii.gov/dbedt/op/

Ref. No. P-13922

March 18, 2013

Ms. Karlynn Fukuda, Executive Vice President
Munekiyo & Hiraga, Inc.
735 Bishop Street, Suite 238
Honolulu, Hawaii 96813

Dear Ms. Fukuda:

Subject: Draft Environmental Assessment and Special Management Area Use Permit Application for Proposed Kahului Airport Consolidated Rental Car Facility at Tax Map Key: (2) 3-8-001:019 (por.) and 239, Kahului, Maui, Hawaii

Thank you for the opportunity to provide comments on the Draft Environmental Assessment (EA) and Special Management Area (SMA) Use Permit Application for the proposed Kahului Airport Consolidated Rental Car Facility at Tax Map Key: (2) 3-8-001:019 (por.) and 239, Kahului, Maui, Hawaii.

The Office of Planning has reviewed the subject Draft EA and has the following comments to offer:

1. Besides compliance with the National Environmental Policy Act, this EA was also prepared to comply with the Hawaii Environmental Protection Act, as codified in Hawaii Revised Statutes (HRS) Chapter 343. The Hawaii Coastal Zone Management (CZM) Act, HRS Chapter 205A, requires all state and county agencies to enforce the CZM objectives and policies. Section 5.1, Relationships to Plans, Policies, and Controls, pages 5-1 to 5-7, needs to discuss the proposed project's relationship to the Hawaii CZM Act. With the information provided in Section 4.10, Coastal Resources, Section 5.1 should be revised to include an assessment as to how the proposed project conforms to HRS Chapter 205A, CZM objectives and their supporting policies. This is an important component for satisfying the requirements of HRS Chapter 343, and obtaining the SMA use approval. 9-1

2. The National CZM Act requires direct federal activities and development projects to be consistent with approved state coastal programs to the maximum extent practicable. Also, federally-permitted, licensed, or assisted activities occurring in, or affecting the state's coastal zone must be in agreement with the Hawaii CZM Program's objectives and policies. Pursuant to HRS Chapter 205A, the Office of 9-2

Planning is the lead agency of the Hawaii CZM Program. The Office of Planning is currently attached to the Department of Business, Economic Development and Tourism for administrative purposes. The statement of the Draft EA, on page 3-21, should be revised as, "According to [~~the Hawaii Department of Business, Economic Development and Tourism~~] the State of Hawaii Office of Planning, the Proposed Action is not on a list of federal actions that trigger a consistency [~~determination~~] concurrence with the State's Coastal Zone Management Program (CZMP)." 9-2 cont.

The comments in this letter related to the SMA use permit application provide guidance and are not regulatory. The planning department of the various counties is charged with assessing SMA permit applications. Final decision-making is vested in county planning commissions, or the county council. 9-3

If you have any questions regarding this comment letter, please contact Leo Asuncion, CZM Program Manager, at 587-2875.

Sincerely,

Jesse K. Souki
Director

c: Mr. Jeffrey Chang, Airports Division, Department of Transportation
Mr. Paul F. Fasi, Department of Planning, County of Maui

RESPONSE TO COMMENT 9 (AS-06)

Response 9-1:

Comment noted. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act has been included in Section 5.1.

Response 9-2:

Text in Section 3.7.5 has been updated to state: "According to the State of Hawaii Office of Planning, the Proposed Action is not on a list of federal actions that trigger a consistency concurrence with the State's Coastal Zone Management Program (CZMP)."

Response 9-3:

Comment noted. DOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action.

Comment Letter No.
AS-12

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

NEIL ABERCROMBIE
GOVERNOR
RICHARD C. LIM
DIRECTOR
MARY ALICE EVANS
DEPUTY DIRECTOR
JESSE K. SOUKI
DIRECTOR
OFFICE OF PLANNING

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-13686

August 7, 2012

To: Gene Matsushige, Head Construction Engineer
Engineering Branch, Airports Division
Department of Transportation

From: Jesse K. Souki, Director

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport
State Project No. AM1032-13 (AIR-EC 12.0281)

Thank you for the opportunity to provide comments on the preparation of a Draft Environmental Assessment (Draft EA) for the subject project. It is our understanding that the Department of Transportation, Airports Division, is proposing the construction and operation of a consolidated rental car facility (ConRAC) at Kahului Airport, and the Draft EA is being prepared to comply with both Federal Aviation Administration requirements under the National Environmental Policy Act and State of Hawaii requirements under the Hawaii Environmental Protection Act.

The proposed ConRAC facilities will include a customer service building, ready/return structure, quick turnaround area, site landscaping, infrastructure improvements, connections to terminal roadway system, and the installation of flat-plate photovoltaic panels of the roof of the ready/return structure. These improvements are proposed to provide necessary space for on-airport rental car companies to accommodate ready/return and quick turn around facilities in a single location at Kahului Airport. Other rental car activities such as excess rental car storage, dealer preparation, and heavy maintenance would continue to occur at the existing rental car facility locations on-airport. The proposed ConRAC will provide adequate facilities for rental car companies, reduce traffic and congestion on terminal roadways, and enhance the customer/passenger experience.

Five on-airport sites, as shown on Exhibit 2 enclosed with the July 23, 2012 memorandum soliciting advanced comments on the preparation of a Draft EA, will be examined, together with a no action alternative and off-site alternatives.

The Office of Planning has reviewed the material provided in your memorandum dated July 23, 2012, and has the following comments to offer:

1. The entire state is defined to be within the Coastal Zone Management Area (Hawaii Revised Statutes (HRS) Section 205A-1 - definition of "coastal zone management area"). The Draft EA should include a section that addresses the proposed project's consistency with the objectives and policies set forth in HRS Section 205A-2. 23-1

2. Based on data from the County of Maui Planning Department, it appears that four of the five on-airport sites being evaluated, Sites 1, 2, 3, and 5, are within the Special Management Area (SMA) established by the County of Maui.

   The County of Maui Planning Department should be consulted to confirm whether the on-airport sites to be examined, as well as any off-airport sites to be considered, are within the SMA, and if so determined, obtain SMA permit requirements for the proposed project. 23-2

   If it is determined that the sites (on-airport and off-airport) to be evaluated are within the SMA, the Draft EA should include a section that addresses the guidelines set forth in HRS Section 205A-26.

Thank you for the opportunity to comment on the preparation of a Draft EA for the proposed Kahului Airport roadway improvements and ConRAC project.

Should you have questions or require clarification on the comments above, please do not hesitate to contact Leo Asuncion, Coastal Zone Management Program Manager, at 587-2875.

RESPONSE TO COMMENT 23 (AS-12)

Response 23-1:

Comment noted. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act was included in Section 4.10, "Coastal Resources" and has also been added to Section 5.1.

Response 23-2:

Comment noted. DOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action. Information regarding the Hawaii Coastal Zone Management (CZM) Act and how the Proposed Action conforms to the objectives and policies of the CZM Act has been included in Section 5.1.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0284

July 19, 2013

TO: KAREN SODDEN, EXECUTIVE DIRECTOR
DEPARTMENT OF BUSINESS, ECONOMIC
DEVELOPMENT & TOURISM

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. The Hawaii Department of Transportation - Airports Division received your comment letter dated August 3, 2012 (reference number **12:PEO/44**), which noted that you had no housing-related comments on the Draft Environmental Assessment. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

LINDA LINGLE
GOVERNOR

Comment Letter
No. AS-07

KAREN SEDDON
EXECUTIVE DIRECTOR

STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

IN REPLY REFER TO:

12:PEO/44

August 3, 2012

Mr. Gene Matsushige
Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Re: Roadway Improvements and ConRAC Facility, Kahului Airport
State Project No. AM1032-13

Thank you for seeking our comments on the proposed Roadway Improvements and ConRAC Facility at the Kahului Airport. We have no housing-related comments to offer at this time. 18-1

Sincerely,

Karen Seddon
Executive Director

RESPONSE TO COMMENT 18 (AS-07)

Response 18-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0285

July 19, 2013

TO: RUSSELL Y. TSUJI, LAND ADMINISTRATOR
LAND DIVISION
DEPARTMENT OF LAND AND NATURAL RESOURCES

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. The Hawaii Department of Transportation - Airports Division received your letter dated August 14, 2012, which noted that you had no comments on the proposed project. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

EnclosureS: Comment Letter and Responses

Comment Letter
No. AS-08

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 14, 2012

Department of Transportation
Attention: Mr. Gene Matsushige, Head Construction Engineer
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Matsushige:

SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments. 19-1

At this time, the DLNR has no comments to offer on the subject matter. If you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

cc: Central Files

RESPONSE TO COMMENT 19 (AS-08)

Response 19-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0286

July 19, 2013

TO: THE HONORABLE DEAN H. SEKI
COMPTROLLER, DEPARTMENT OF ACCOUNTING AND
GENERAL SERVICES

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division on August 7, 2012 (letter dated August 3, 2012). Attached please find your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

Comment Letter
No. AS-09

DIR 1198

NEIL ABERCROMBIE
GOVERNOR

DEAN H. SEKI
COMPTROLLER

STATE OF HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

AUG - 3 2012

(P)1163.2

MEMORANDUM

2012 AUG -7 A 11:10
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION

TO: Mr. Gene Matsushige
Airports Division, Engineering Branch
Department of Transportation

FROM: Dean H. Seki
Comptroller

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13
Environmental Assessment (EA), Letter dated July 23, 2012

Thank you for the opportunity to provide comments for the subject project. The proposed location does not impact any of the Department of Accounting and General Service's existing facilities in the area. However alternative site 3, if utilized, is located relatively close to our facilities on Mua Street. If this alternative site is used, it could possibly add additional vehicular traffic along Keolani Place. 20-1

We have no other comments to offer at this time.

Once the EA is prepared, please allow us to review the document to ensure that our facilities are not adversely impacted. 20-2

If you have any questions, please call me at 586-0400 or have your staff call Mr. Alva Nakamura of the Public Works Division at 586-0488.

c: Honorable Glenn Okimoto, Ph.D., Dir. DOT

RESPONSE TO COMMENT 20 (AS-09)

Response 20-1:

Comment noted. As documented in Chapter 2, "Alternatives", Alternative Site 3 was not carried forward as a feasible alternative for detailed analysis.

Response 20-2:

Comment noted. The Draft EA was submitted to the Department of Accounting and General Services on March 1, 2013 (as part of the SMA application) for review.

NEIL ABERCROMBIE
GOVERNOR

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

IN REPLY REFER TO:
AIR-EC
13.0287

July 19, 2013

TO: DOUG MAYNE, VICE DIRECTOR OF CIVIL DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
DEPARTMENT OF DEFENSE

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments sent to the Hawaii Department of Transportation - Airports Division dated August 9, 2012, which noted that the proposed project area falls within coverage arcs of existing warning sirens. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

Comment Letter No.
AS-13

NEIL ABERCROMBIE
GOVERNOR

MAJOR GENERAL DARRYLL D. M. WONG
DIRECTOR OF CIVIL DEFENSE

DOUG MAYNE
VICE DIRECTOR OF CIVIL DEFENSE

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

PHONE (808) 733-4300
FAX (808) 733-4287

August 9, 2012

Mr. Gene Matsushige
Engineering Branch
Airports Division
Department of Transportation
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

Roadway Improvements and ConRAC Facility
Kahului Airport, State Project No. AM1032-13

Thank you for the opportunity to comment on this proposed project.

After review of the documents provided for the subject project, we have determined that the proposed project area falls within coverage arcs of existing warning sirens. We anticipate reviewing the Draft Environmental Assessment upon its completion. 24-1

If you have any questions please call Ms. Havinne Okamura, Hazard Mitigation Planner, at 733-4300, extension 556.

Sincerely,

EXECUTIVE OFFICER

FOR DOUG MAYNE
Vice Director of Civil Defense

RESPONSE TO COMMENT 24 (AS-13)

Response 24-1:

Comment noted. The Draft EA was submitted to the Department on March 8, 2013 for review.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0288

July 19, 2013

TO: WILLIAM M. TAM, DEPUTY DIRECTOR
COMMISSION ON WATER RESOURCE MANAGEMENT
DEPARTMENT OF LAND AND NATURAL RESOURCES

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments dated August 28, 2012. Your comments were forwarded to the Hawaii Department of Transportation - Airports Division by Russell Tsuji of the Department of Land and Natural Resources, Land Division, on August 29, 2012. Attached please find your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

c: Mr. Russell Y. Tsuji, Department of Land and Natural Resources – Land Division

Comment Letter No.
AS-14

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 29, 2012

Department of Transportation
Attention: Mr. Gene Matsushige, Head Construction Engineer
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Matsushige:

SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13

Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on August 14, 2012, enclosed are comments from the Commission on Water Resource Management on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

25-1

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

LAND DIVISION

2012 AUG 28 AM 11: 33

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

DEPT. OF LAND & NATURAL RESOURCES STATE OF HAWAII

August 28, 2012

REF: Kahului Airport Improvements EA Prep

TO: Russell Tsuji, Administrator
Land Division

FROM: William M. Tam, Deputy Director
Commission on Water Resource Management

SUBJECT: Roadway Improvements and CONRAC Facility, Kahului Airport, State Project No. AM1032-13, Kahului, Island of Maui

FILE NO.:
TMK NO.: (2)3-8-01(varies)

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at http://www.hawaii.gov/dlnr/cwrm.

Our comments related to water resources are checked off below.

☐ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.

☒ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan. 25-2

☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.

☒ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/pp/index.htm. 25-3

☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/czm/initiative/lid.php. 25-4

☒ 6. We recommend the use of alternative water sources, wherever practicable. 25-5

☐ 7. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM:
Additional information and forms are available at http://hawaii.gov/dlnr/cwrm/resources_permits.htm.

☐ 8. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.

☐ 9. A Well Construction Permit(s) is (are) required before any well construction work begins.

☐ 10. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.

☐ 11. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.

☐ 12. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.

☐ 13. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.

☐ 14. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.

☐ 15. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.

☒ 16. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources. 25-6

☒ OTHER:
For project landscaped areas, we recommend following the Landscape Industry Council of Hawaii's irrigation water conservation best practices (http://landscapehawaii.org/_library/images/lich_irrigation_water_position_statement%2020110107.pdf).
We also recommend that stormwater be utilized onsite for irrigation needs to the extent possible, and that water efficient fixtures be used in the offices and vehicle washing facilities. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/products/index.html 25-7

If there are any questions, please contact Lenore Ohye at 587-0216.

8/7/12

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 2, 2012

MEMORANDUM

TO: FROM:

DLNR Agencies:
___Div. of Aquatic Resources
___Div. of Boating & Ocean Recreation
_X_Engineering Division
___Div. of Forestry & Wildlife
___Div. of State Parks
_X_Commission on Water Resource Management
_X_Office of Conservation & Coastal Lands
_X_Land Division – Maui District
_X_Historic Preservation

RECEIVED
LAND DIVISION
2012 AUG -2 P 2:28
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

FROM: TO: Russell Y. Tsuji, Land Administrator
SUBJECT: Kahului Airport Roadway Improvements and Conrac Facility
State Project No. AM1032-13
LOCATION: Kahului, Island of Maui; TMK: (2) 3-8-01 (varies)
APPLICANT: State Department of Transporatation

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by August 13, 2012.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

2012 AUG -3 AM 8:13

Attachments

( ) We have no objections.
( ) We have no comments.
(X) Comments are attached.

Signed:
Print Name: William M. Tam, Deputy Director
Date: August 28, 2012

cc: Central Files

RESPONSE TO COMMENT 25 (AS-14)

Response 25-1:

Comment noted.

Response 25-2:

Comment noted. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The proposed ConRAC would relocate existing functions at the Airport into one location. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation.

Response 25-3:

As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 25-4:

Section 4.7, "Water Quality", discusses potential effects to water quality and the best management practices (BMPs) that would be incorporated into the project. Water quality BMPs would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements.

Response 25-5:

Comment noted. As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. Potable water for restrooms, drinking water, car wash facilities, etc. would come from the Maui County Department of Water Supply. The car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 25-6:

As discussed in Section 4.7, "Water Quality", water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. Potable water for restrooms, drinking water, car wash facilities, etc. would come from the Maui County Department of Water Supply. The car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

Response 25-7:

Comment noted. See responses to Comment 17-1 and 25-3.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0289

July 19, 2013

TO: ALEC WONG, CHIEF
CLEAN WATER BRANCH
DEPARTMENT OF HEALTH

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division on May 28, 2013 (letter dated May 24, 2013; reference number **EMD/CWB**). Attached please find your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

Comment Letter No.
AS-15

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
EMD/CWB

05075PJF.13

May 24, 2013

Received
MAY 28 2013

Mr. Steve Culberson
Ricondo & Associates, Inc.
3239 Ualena Street, 3rd Floor
Honolulu, Hawaii 96819

Dear Mr. Culberson:

SUBJECT: Draft Environmental Assessment (DEA) for Consolidated Rental Car Facility Kahului, Island of Maui, Hawaii

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated March 6, 2013, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the 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://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf. 34-1 34-2

1. Any project and its potential impacts to State waters must meet the following criteria: 34-3

   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). An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the CWB Individual NPDES Form through the e-Permitting Portal and the hard copy certification 34-4

statement with $1,000 filing fee. Please open the e-Permitting Portal website at: https://eha-cloud.doh.hawaii.gov/epermit/View/home.aspx. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the "CWB Individual NPDES Form." Follow the instructions to complete and submit this form. 34-4 Cont.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 438-9258) regarding their permitting requirements. 34-5

   Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and HAR, Chapter 11-54. 34-6

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Non-compliance 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. 34-7

If you have any questions, please visit our website at: http://www.hawaii.gov/health/environmental/water/cleanwater/index.html, or contact the Engineering Section, CWB, at 586-4309. 34-8

Sincerely,

Darryl Lum TM for AW

ALEC WONG, P.E., CHIEF
Clean Water Branch

JF:np

c: DOH-EPO #13-055 [via e-mail only]

RESPONSE TO COMMENT 34 (AS-15)

Response 34-1:

Comment noted.

Response 34-2:

Comment noted. The Clean Water Branch's Standard Comments (dated August 22, 2008) were reviewed. Please see response to Comment 5-1.

Response 34-3:

Please see response to Comment 1-2 and Comment 7-1. Kalialinui Stream is not included in the State of Hawaii, Department of Health water quality monitoring assessment; however, the Department of Health reports that the waters off of Kanahā Beach are attaining water quality standards.

Section 4.7, "Water Quality", discusses potential effects to water quality and the best management practices (BMPs) that would be incorporated into the project. Water quality BMPs would be integrated into a future storm water management plan (SWMP) for the site. Ongoing implementation of Airport-wide water quality measures, such as source control BMPs (i.e., non-storm water management, waste handling/disposal, good housekeeping, spill prevention, control, and cleanup), as set forth in the SWMP, would also help address potential water quality impacts associated with the proposed improvements.

Response 34-4:

Please see response to Comment 7-1. Section 4.7, "Water Quality", discusses potential effects to water quality, the best management practices that would be incorporated into the project, and NPDES permit requirements.

Response 34-5:

Please see response to Comment 1-2. The U.S. Army Corps of Engineers, Regulatory Branch has been contacted and coordinated with during the preparation of the EA.

Response 34-6:

As described in Section 4.8, "Wetlands", Kalialinui Stream, which lies in a culvert beneath the Alternative 5 site, is a jurisdictional Waters of the United States. Because this stream passes directly under the site in a buried concrete aqueduct, it would not be affected by the construction or operation of the proposed ConRAC facility if it is protected during construction and through implementation of BMPs. Kalialinui Stream would continue to serve as an ocean outlet for storm water originating on the Airport and as a key element of the Airport storm water drainage system.

Response 34-7:

Comment noted. Drainage improvements include the construction and operation of two storm water detention basins to prevent an increase in runoff from Alternative site 5. Applicable BMPs and erosion-control measures would be implemented to mitigate runoff during construction-related activities as described in Section 4.19.3, "Construction Impacts – Water Quality". Also, please see response to Comment 25-5.

Response 34-8:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0293

July 19, 2013

TO: JEFFREY ECKERD, PROGRAM MANAGER
INDOOR AND RADIOLOGICAL HEALTH BRANCH
DEPARTMENT OF HEALTH

FROM: FORD N. FUCHIGAMI
DEPUTY DIRECTOR - AIRPORTS

SUBJECT: RESPONSE TO COMMENTS
DRAFT ENVIRONMENTAL ASSESSMENT FOR
CONSOLIDATED RENTAL CAR FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division on June 11, 2013 (letter dated June 3, 2013). Attached please find your comment letter and our response, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Enclosures: Comment Letter and Responses

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

Comment Letter No.
AS-16

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File

June 3, 2013

Received
JUN 11 2013

Mr. Steve Culberson
Ricondo & Associates, Inc.
3239 Ualena Street, Third Floor
Honolulu, HI 96819

Dear Mr. Culberson:

This correspondence is in response to your request for comments to the Draft Environmental Assessment for the Consolidated Rental Car Facility at Kahului Airport.

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

- Chapter 11-46 Community Noise Control
- Chapter 11-501 Asbestos Requirements
- Chapter 11-503 Fees for Asbestos Removal & Certification
- Chapter 11-504 Asbestos Abatement Certification Program

35-1

Should you have any questions, please contact me at (808) 586-4701.

Sincerely,

Jeffrey M. Eckerd
Program Manager
Indoor and Radiological Health Branch

C: Federal Aviation Administration, Honolulu Airports District Office
State of Hawaii, Department of Transportation, Airports Division
Hawaii State Library
Kahului Public Library

RESPONSE TO COMMENT 35 (AS-16)

Response 35-1:

Comment noted. As described in the response to Comment 5-1, the proposed ConRAC facility would comply with the Administrative Rules of the Department of Health. See response to Comment 7-2 regarding Chapter 11-46, "Community Noise Control."

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0268

July 19, 2013

Mr. Paul Haake
Captain, Fire Prevention Bureau
Maui County Department of Fire & Public Safety
313 Manea Place
Wailuku, Hawaii 96793

Dear Mr. Haake:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division dated March 22, 2013. Attached please find your comment letter and our response, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

E-10.0117

ALAN M. ARAKAWA
MAYOR

Comment Letter No.
AL-01

JEFFREY A. MURRAY
CHIEF

ROBERT M. SHIMADA
DEPUTY CHIEF

COUNTY OF MAUI
DEPARTMENT OF FIRE AND PUBLIC SAFETY
FIRE PREVENTION BUREAU

313 MANEA PLACE • WAILUKU, HAWAII 96793
(808) 244-9161 • FAX (808) 244-1363

March 22, 2013

To : Jeffrey Chang
Engineering Program Manager
State of Hawaii, Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Blvd., Suite 700
Honolulu, HI 96819

Re : Draft EA and SMA for the Kahului ConRAC Facility

Dear Mr. Chang:

Thank you for the opportunity to comment on the subject project. At this time, the Department of Fire & Public Safety has no comment in regards to the Draft EA or SMA application.

Our department does reserve the right to comment during the building permit process and any special permit approvals, e.g., fuel storage, requested from our office.

10-1

If there are any questions or comments, please feel free to contact me at 244-9161 ext. 23.

Regards,

Paul Haake
Captain, Fire Prevention Bureau
Department of Fire & Public Safety
313 Manea Place
Wailuku, HI 96793

RESPONSE TO COMMENT 10 (AL-01)

Response 10-1:

Comment noted. DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0269

July 19, 2013

Mr. Wayde T. Oshiro
Housing Administrator
Department of Housing and Human Concerns
Housing Division, County of Maui
35 Lunalilo Street, Suite 102
Wailuku, Hawaii 96793

Dear Mr. Oshiro:

Subject: Roadway Improvements and Consolidated Rental
Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. The Hawaii Department of Transportation - Airports Division received your letter on March 21, 2013 (letter dated March 18, 2013), which noted that the Proposed Action is not subject to Chapter 2.96 of the Maui County Code, "Residential Workforce Housing Policy," and that you had no additional comments on the Draft Environmental Assessment. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AL-02

DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
HOUSING DIVISION
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
JO-ANN T. RIDAO
Director
JAN SHISHIDO
Deputy Director

35 LUNALILO STREET, SUITE 102 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7351 • FAX (808) 270-6284

Received
MAR 21 2013

March 18, 2013

Mr. Ura Quoniou
Ricondo & Associates
3229 Ualena Street, Third Floor
Honolulu, Hawaii 96819

Dear Mr. Ura Quoniou:

Subject: Draft Environmental Assessment (EA) on the Consolidated Rental Car Facility, Kahului Airport, Kahului, Maui 96732 TMK (2) 3-8-001:239, (2) 3-8-001:123 & (2) 3-8-079:021

The Department has reviewed the Draft Environmental Assessment (EA) for the above subject project. Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. At the present time, the Department has no additional comments to offer. 11-1

Please call Mr. Veranio Tongson Jr. of our Housing Division at (808) 270-1741 if you have any questions.

Sincerely,

Wayde T. Oshiro

WAYDE T. OSHIRO
Housing Administrator

cc: Director of Housing and Human Concerns

RESPONSE TO COMMENT 11 (AL-02)

Response 11-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

IN REPLY REFER TO:
AIR-EC
13.0270

July 19, 2013

Mr. Glenn T. Correa
Director
Department of Parks & Recreation
700 Hali'a Nakoa Street, Unit 2
Wailuku, Hawaii 96793

Dear Mr. Correa:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division. We received your scoping comment letter dated August 10, 2012, and your Draft Environmental Assessment comment letter dated March 28, 2013. Attached please find a copy of your two comment letters and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AL-03

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director
BRIANNE SAVAGE
Deputy Director

(808) 270-7230
FAX (808) 270-7934

DEPARTMENT OF PARKS & RECREATION
700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

Received
APR 11 2013

March 28, 2013

Mr. Jeffrey Chang, Engineering Program Manager
Hawaii Department of Transportation
DOT-Airports Division (AIR-EP), Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, HI 96819

Dear Mr. Chang:

SUBJECT: Draft Environmental Assessment, Consolidated Rental Car Facility, Kahului Airport

Thank you for the opportunity to review and comment on the subject project.

The Department of Parks & Recreation is in support of the project. Furthermore, the Department agrees that Alternative Sites 4 & 5 best meet the criteria for the Consolidated Rental Car Facility, and neither site will affect the County of Maui's Kanaha Beach Park. 12-1

Should you have any questions or concerns, please feel free to contact me or Robert Halvorson, Chief of Planning and Development, at (808) 270-7931.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning & Development

GTC:RH:csa

S:\PLANNING\CSA\County Reviews\EA & EIS Reviews\ConRAC Facility Kahului Airport DEA.doc

RESPONSE TO COMMENT 12 (AL-03)

Response 12-1:

Comment noted.

Comment Letter
No. AL-07

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director

PATRICK T. MATSUI
Deputy Director

(808) 270-7230
FAX (808) 270-7934

DEPARTMENT OF PARKS & RECREATION
700 Hall'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

August 10, 2012

Mr. Gene Matsushige
State of Hawaii, Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

Dear Mr. Matsushige:

SUBJECT: Roadway Improvements and ConRAC Facility, Kahului Airport, State Project No. AM1032-13, AIR-EC 12.0279

Thank you for the opportunity to review and comment on the subject project.

The Department of Parks & Recreation is in support of the project. We look forward to reviewing the Environmental Assessment when it is available.] 26-1

Please feel free to contact me or Robert Halvorson, Chief of Planning and Development, at (808) 270-7931, should you have any questions.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning and Development

GTC:RH:ca

RESPONSE TO COMMENT 26 (AL-07)

Response 26-1:

Comment noted. The Draft EA was submitted to the Department on March 8, 2013 for review.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0271

July 19, 2013

Mr. Clayton I. Yoshida, AICP
Planning Program Administrator
County of Maui Department of Planning
250 South High Street
Wailuku, Hawaii 96793

Dear Mr. Yoshida:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division dated April 3, 2013. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director

Comment Letter No.
AL-04

COUNTY OF MAUI
DEPARTMENT OF PLANNING

April 3, 2013

Hawaii Department of Transportation
DOT-Airports Division (AIR-EP), Engineering Branch
400 Rodgers Boulevard, 7th Floor
Honolulu, Hawaii 96819

Attention: Jeffrey Chang, Engineering Program Manager

Dear Mr. Chang:

SUBJECT: REQUEST FOR COMMENTS (RFC) ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR THE PROPOSED CONSOLIDATED RENTAL CAR FACILITY, LOCATED AT KAHULUI AIRPORT, MAUI, HAWAII; (RFC 2013/0038)

The Department of Planning (Department) is in receipt of the above-referenced RFC. At this time, the Department has one (1) comment to offer: The parcel is located in the Special Management Area (SMA) and will be required to acquire a SMA Permit. 13-1

Thank you for the opportunity to comment. Should you require further clarification, please contact Staff Planner Paul Fasi at paul.fasi@mauicounty.gov or at (808) 270-7814.

Sincerely,

CLAYTON I. YOSHIDA, AICP
Planning Program Administrator

for WILLIAM SPENCE
Planning Director

xc: Paul F. Fasi, Staff Planner (PDF)
Michael T. Munekiyo, AICP, President, Munekiyo & Hiraga, Inc
Project File
General File
WRS:CIY:PFF:vb
K:\WP_DOCS\PLANNING\RFC\2013\0038_ConsolidatedRental\LTR1.doc

RESPONSE TO COMMENT 13 (AL-04)

Response 13-1:

DOT-A submitted a SMA permit application to the Maui Planning Commission on March 1, 2013 for the Proposed Action.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0272

July 19, 2013

Mr. David C. Goode
Director of Public Works
Department of Public Works
200 South High Street, Room No. 434
Wailuku, Hawaii 96793

Dear Mr. Goode:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division. We received your scoping comment letter on August 27, 2012 (letter dated August 22, 2012) and your Draft Environmental Assessment comment letter on April 30, 2013 (letter dated April 25, 2013). Attached please find a copy of your two comment letters and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AL-05

APR 30 2013

ALAN M. ARAKAWA
Mayor

DAVID C. GOODE
Director

ROWENA M. DAGDAG-ANDAYA
Deputy Director

Telephone: (808) 270-7845
Fax: (808) 270-7955

GLEN A. UENO, P.E., Interim
Development Services Administration

CARY YAMASHITA, P.E.
Engineering Division

BRIAN HASHIRO, P.E.
Highways Division

COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM NO. 434
WAILUKU, MAUI, HAWAII 96793

April 25, 2013

Ms. Karlynn Fukuda, Executive Vice President
MUNEKIYO & HIRAGA, INC.
305 High Street, Suite 104
Wailuku, Maui, Hawaii 96793

Dear Ms. Fukuda:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT AND SPECIAL MANAGEMENT AREA USE PERMIT APPLICATION FOR PROPOSED KAHULUI AIRPORT CONSOLIDATED RENTAL CAR FACILITY; TMK: (2) 3-8-001:019 (POR.) AND 239; SM1 2013/0002

We reviewed the subject application and have the following comments:

1. The applicant shall be responsible for all required improvements as required by Hawaii Revised Statutes, Maui County Code and rules and regulations. 16-1

2. As applicable, construction plans shall be designed in conformance with Hawaii Standard Specifications for Road and Bridge Construction dated 2005 and Standard Details for Public Works Construction, 1984, as amended. 16-2

3. As applicable, worksite traffic-control plans/devices shall conform to Manual on Uniform Traffic Control Devices for Streets and Highways, 2003. 16-3

Please call Rowena M. Dagdag-Andaya at 270-7845 if you have any questions regarding this letter.

Sincerely,

DAVID C. GOODE
Director of Public Works

DCG:RMDA:ls
xc: Highways Division
Engineering Division
Jeff Chang, State of Hawaii Department of Transportation
Paul Fasi, Department of Planning
S:\LUCA\CZM\prop_kahului_airport_consolidated_car_rental_facility_sma_dea_38001019 with glen ueno_ls

RESPONSE TO COMMENT 16 (AL-05)

Response 16-1:

Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations. DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works, regarding its intent to waive the County building permit requirement for this project.

Response 16-2:

Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations.

Response 16-3:

Comment noted. The proposed development and operation of the ConRAC facility would comply with all applicable Hawaii Revised Statutes, Maui County Code and rules and regulations.

Comment Letter No.
AL-10

DIR 1306

ALAN M. ARAKAWA
Mayor

DAVID C. GOODE
Director

ROWENA M. DAGDAG-ANDAYA
Deputy Director

Telephone: (808) 270-7845
Fax: (808) 270-7955

COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM NO. 434
WAILUKU, MAUI, HAWAII 96793

RALPH NAGAMINE, L.S., P.E.
Development Services Administration

CARY YAMASHITA, P.E.
Engineering Division

BRIAN HASHIRO, P.E.
Highways Division

August 22, 2012

2012 AUG 27 P 4:36
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION

Glenn M. Okimoto, Ph.D.
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Dr. Okimoto:

SUBJECT: ROADWAY IMPROVEMENTS AND CONRAC FACILITY
KAHULUI AIRPORT
STATE PROJECT NO. AM1032-13

We reviewed the subject application and have no comments at this time, but wish to hold our comments until review of the Draft Environmental Assessment. 29-1

Please call Rowena M. Dagdag-Andaya at (808) 270-7845 if you have any questions regarding this letter.

Sincerely,

DAVID C. GOODE
Director of Public Works

DCG:RMDA:jtc
xc: Highways Division
Engineering Division
S:\LUCA\CZM\Draft Comments\kahului_airport_roadway_improvements_project_am1032-13_jtc.wpd

RESPONSE TO COMMENT 29 (AL-10)

Response 29-1:

Comment noted. The Draft EA was submitted to the Department on March 1, 2013 (as part of the SMA application) for review.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0273

July 19, 2013

Mr. William Spence
Planning Director
County of Maui Department of Planning
250 South High Street
Wailuku, Hawaii 96793

Dear Mr. Spence:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division on May 13, 2013 (letter dated May 9, 2013). Attached please find a copy of your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director

Comment Letter No.
AL-06

MAY 13 2013

COUNTY OF MAUI
DEPARTMENT OF PLANNING

May 9, 2013

Mr. Glenn Okimoto, Director
State of Hawaii
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Okimoto:

SUBJECT: MAUI PLANNING COMMISSION (COMMISSION) COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR THE PROPOSED CONSOLIDATED RENTAL CAR (ConRAC) FACILITY, LOCATED AT KAHULUI AIRPORT, MAUI, HAWAII; TMK(S): (2) 3-8-001:019 AND (2) 3-8-001:239 (SM1 2013/0002)

At its regular meeting on April 23, 2013, the Commission reviewed and commented on the Draft EA prepared for the State of Hawaii, Department of Transportation's (DOT) Proposed ConRAC Facility at the Kahului Airport. It was noted that the DOT is the Approving Agency for the EA document, and the Commission will review and act on the Special Management Area Use Permit application that was filed with the Department of Planning for the project. The Commission received a presentation by the project's consultant, Ricondo & Associates, Inc. The Commission's comments on the Draft EA are provided below:

1. Provide more information on the visual appearance of the ConRAC Facility and how it will incorporate a Hawaiian sense of place into the design. Also requested for consideration by DOT is to incorporate endemic and indigenous Hawaiian plants and fragrant plants, as this facility will be the first and last impression for visitors to Maui; 17-1

2. Additional discussion on the source of water for the water feature for the Kahului Airport and the landscaping surrounding the ConRAC Facility. Explore the option of using "R-1" water from the County of Maui and/or reuse of the car wash water in the ConRAC Facility for irrigation purposes; 17-2

3. Provide additional information on the height of the ConRAC Facility with the planned grades from Keolani Place and the Airport Access Road. Discussion may include information about set backs and landscaping screening; 17-3

4. General support for the concept of the ConRAC Facility because it will consolidate the rental car operations and assist in controlling environmental impacts from the individual operations; 17-4

5. Ensure that the existing underground drainage channel (Kaliallnui Stream) is protected during construction. Also requested for consideration is the installation of grating over the drainage channels for public safety and maintenance; 17-5

6. Discuss how the loss of the future planned overflow parking area with the construction of the ConRAC Facility and the movement of the employee parking stalls to the ConRAC Facility will benefit public parking at the Airport; 17-6

7. Recommends that in designing the facility, DOT consider the operations and maintenance for the ConRAC Facility to ensure that it can be easily maintained; 17-7

8. Requests further clarification of Alternative Site No. 4 and No. 5 in regards to possible future expansion plans for the terminal building, runway, or new roads in the Airport area. Also include consultation with State and Federal agencies, if applicable, for future terminal and public parking facilities plans at the Airport; 17-8

9. Additional discussion on how runoff will be handled onsite or offsite; and 17-9

10. Commented that DOT should consider the use of efficient fixtures (lighting and water fixtures) and installation of security cameras in the ConRAC Facility. 17-10

Thank you for the opportunity to comment on the Draft EA. Should you have any questions or need additional clarification, please contact Staff Planner Paul Fasi at paul.fasi@maulcounty.gov or at (808) 270-7814.

Sincerely,

WILLIAM SPENCE
Planning Director

xc: Paul F. Fasi, Staff Planner (PDF)
Karlynn Fukuda, Munekiyo & Hiraga, Inc.
UDRB File
Project File
General File

WRS:PFF:aj
K:\WP_DOCS\PLANNING\SM1\2013\0002_ConsolidatedRental\Staff Report to Approval\MPC Comment Letter to SDOT.doc

RESPONSE TO COMMENT 17 (AL-06)

Response 17-1:

Through input and direction from the airport stakeholders, the design team has identified and implemented a cultural theme and concept that is based on the Plantation Style architecture found locally in Wailuku and Lahaina. These cultural guiding principles informed decisions concerning overall building massing along with specific materials and color palette and would directly shape the building's aesthetics.

The essence of the Plantation Style is a formal prominence created by a strong, simple roof form that diminishes in height on either end. The Plantation Style includes a central, prominent roof form as its major feature. The floor plan is massed around a central enclosed space and large perimeter lanai formed by large, deep roof overhangs. The ConRAC massing and proportions have been created following these Plantation Style principles. The facility would feature prominent roof forms topping the south and north edges along with metal trellis screening and masonry walls below. The entire structure would be surrounded by a landscape buffer featuring indigenous planting to soften and shield the building.

Visitors to the facility would be welcomed into a large lanai that surrounds the central customer service area and circulation cores. These pedestrian areas would feature warm-colored, natural materials. Arranged prominently throughout the plaza would be plantings filled with indigenous Hawaiian vegetation that would greet and welcome customers with the fragrances and colors of Maui. A glass and trellis canopy above would protect visitors and form the primary roof of the Lanai while allowing visitors to connect with the sun, sky and natural light.

The materials for the facility would include a mix of colors and texture inspired by the Plantation Style and local natural features. The prominent use of Shell Stone references the historical use of coral stone on the island within the Plantation Style. In addition to the neutral colored Shell Stone, the project would feature a multi-colored Slate accent stone that would connect with the varied indigenous colors of Maui and set a baseline palette for the accent colors of the facility.

The roofs, screening, trellis and storefronts would use dark bronze metal inspired by the rust and copper colors seen around the island. The wood accents in the ceiling treatments and handrail components would take inspiration from the historical use of Koa wood.

These forms, materials and landscaping would create a cohesive composition that would incorporate a Hawaiian sense of place into the facility while forming a lasting impression for visitors.

Response 17-2:

It is noted that DOT-A met with Mayor Arakawa, most recently in March 2013, to discuss the potential use of R-1 water for irrigation purposes at the ConRAC facility. Based on those discussions, it is our understanding that 1) there are infrastructural improvements needed at the Wailuku-Kahului Wastewater Treatment Facility (WKWWTF) to treat the wastewater to the R-1 level and 2) that distribution infrastructure is needed to distribute the R-1 water

from the WKWWTF. As such, DOT-A would continue to communicate with Mayor Arakawa and his administration on the status of the needed improvements to provide R-1 water to the Kahului Airport site.

The water feature identified in the comment is not part of the Proposed Action. However, the source of water for the water feature is non-potable water from the existing on-site A&B well. Non-potable water from the existing on-site A&B well would be used for irrigation of the landscape features associated with the proposed ConRAC facility. The car wash facilities in the ConRAC would utilize a recycling system to minimize water use; thus, this water would not be used for irrigation. As for the R-1 water, DOT-A would provide future connection (stubs) for a potential future R-1 connection.

Response 17-3:

General grading of the site would slope from 40 feet above ground level along the future inbound airport roadway down to 20 feet above ground level along the future outbound airport roadway. Site grading would level out towards Keolani Place. The ConRAC facility would sit on the project site with the basement level at 13 feet above existing ground level. Total building height would be limited to the absolute minimum with the highest point at approximately 60 feet above the basement floor. The design team is fully aware and respectful of the desire to limit the building height in keeping with the surrounding area. Several features have been incorporated into the design of the ConRAC facility that would achieve that goal. These include a 20-foot setback on the north and south sides, reducing the perimeter bays on Level 3, addition of perimeter canopies, and utilizing the natural grading of the site. When viewed from the terminal, only Level 2 and 3 would be visible therefore creating an impression of a 2-story building.

Response 17-4:

Comment noted.

Response 17-5:

The reach of the Kalialinui Stream that crosses the Proposed Action site is buried in a concrete aqueduct that would not be affected by construction or operation of the proposed ConRAC facility. DOT-A will examine whether the installation of grates for public safety and maintenance purposes is feasible.

Response 17-6:

The proposed ConRAC facility includes the provision of 719 parking places for Airport employees on the 3rd level. The existing Airport employee parking is located in the parking lot across from the passenger terminal, behind the Airport public parking. These dedicated Airport employee parking spaces would be converted to Airport public parking, increasing public parking spaces.

A parking study for employee and public parking at Kahului Airport was conducted as part of the Site Selection Study for the ConRAC facility. Taking into account the Airport Master Plan forecast, the Federal Aviation Administration Terminal Area Forecast, and demand elasticity associated with the neighbor island market, the

study determined that over 700 parking stalls would be needed over the planning horizon. The design of the ConRAC facility accounted for this future parking stall demand on the top level of the facility. When demand for public parking stalls materializes, the existing employee parking (currently located on the makai side of the surface lot fronting the terminal) will be relocated to the top level of the ConRAC facility to allow public parking to expand within the existing surface lot fronting the terminal.

Response 17-7:

The operation and maintenance of the proposed ConRAC facility would be the responsibility of the rental car companies utilizing the facility. In most cases, when rental car companies share a consolidated facility, a third-party contractor is obtained by the rental car companies to maintain and keep the facility operating. The proposed ConRAC facility is being designed to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which should reduce operation and maintenance costs. The cost to operate and maintain the proposed ConRAC facility is being considered during design of the facility.

Response 17-8:

Chapter 2, Alternatives, discusses the evaluation of each of the consolidated rental car facility site alternatives. As noted in Chapter 2, both Alternative Sites 4 and 5 met the Purpose and Need criteria, but Alternative Site 5 was selected as the Proposed Action, which is also the rental car companies preferred alternative. Alternative Site 5 is located closer to the passenger terminal and the existing rental car baseyards which would continue to function as heavy maintenance, overflow parking, and administrative areas for the rental car companies. Thus, due to the proximity of Alternative Site 5 to the passenger terminal and existing rental car company baseyards, it would result in less operational costs to the rental car companies than Alternative Site 4.

Additionally, Alternative Site 4 is designated in the Wailuku-Kahului Community Plan as "Agricultural", which would require a change to the plan, and a State Special use permit or a State Land Use District Boundary Amendment which would add at a minimum, 18 months to the process. However the site is located out of the SMA area and thus, no SMA Use Permit would be required. The location of this alternative site would complicate the Airport Access Road system and require rental car shuttles to circulate through the terminal roadway system.

DOT-A is preparing a Master Plan Update for Kahului Airport, which identifies future terminal and public parking facility needs. The proposed ConRAC facility is consistent with the Master Plan Update.

Response 17-9:

The excerpt below is the conclusion from the executive summary of the drainage report prepared for this project:

> "The existing peak storm water runoff is 67.64 cubic feet per second (cfs) and the proposed peak storm water runoff is 140.09 cfs. The Proposed Action would increase the storm water flow by 72.45 cfs during the 50-year 1-hour storm. On-site generated storm water would be collected into detention basins and discharged at a controlled rate into the existing drainage system. Therefore, there would be no adverse drainage impacts to the surrounding areas or the existing drainage system."

This language has been added to Section 4.7.2.

Response 17-10:

As stated in Section 4.7.2, Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which include water quality BMPs and identifying ways to maximize water use efficiency.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0277

July 19, 2013

The Honorable Joseph Pontanilla
Council Vice Chair
Maui City Council
200 South High Street
Wailuku, Hawaii 96793

Dear Council Vice Chair Pontanilla:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. The Hawaii Department of Transportation - Airports Division received your letter dated August 7, 2012, which noted that you had no comments on the proposed project. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AL-08

COUNTY COUNCIL
COUNTY OF MAUI
200 S. HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.mauicounty.gov/council

August 7, 2012

SOH/DOT Airports Division (DOTA)
Attention: Mr. Gene Matsushige
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

SUBJECT: Early Consultation Request for the Preparation of a Draft Environmental Assessment for the Proposed Roadway Improvements and ConRac Facility, Kahului Airport, State Project No. AM1032-13

Dear Mr. Matsushige:

Thank you for the opportunity to provide comments for the proposed Roadway Improvements and ConRac Facility, Kahului Airport, State Project No. AM1032-13.

27-1

After review of the information presented, I have no comments at this time.

Sincerely,

Joseph Pontanilla

JOSEPH PONTANILLA,
COUNCIL MEMBER

RESPONSE TO COMMENT 27 (AL-08)

Response 27-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0274

July 19, 2013

Mr. Kyle K. Ginoza, P.E.
Director
Department of Environmental Management
2200 Main Street, Suite 100
Wailuku, Hawaii 96793

Dear Mr. Ginoza:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comment letter sent to the Hawaii Department of Transportation - Airports Division dated August 15, 2012. Attached please find a copy of your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AL-09

ALAN M. ARAKAWA
Mayor
KYLE K. GINOZA, P.E.
Director
MICHAEL M. MIYAMOTO
Deputy Director

TRACY TAKAMINE, P.E.
Solid Waste Division
ERIC NAKAGAWA, P.E.
Wastewater Reclamation Division

COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2200 MAIN STREET, SUITE 100
WAILUKU, MAUI, HAWAII 96793

August 15, 2012

Mr. Gene Matsushige
State of Hawaii
Department of Transportation
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsushige:

SUBJECT: **ROADWAY IMPROVEMENTS AND CONRAC FACILITY STATE PROJECT NO. AM1032-13, KAHULUI AIRPORT EARLY CONSULTATION FOR DRAFT EA**

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:

   a. Include a plan for construction waste. 28-1

2. Wastewater Reclamation Division (WWRD) comments:

   a. Although wastewater system capacity is currently available as of 8/15/2012, the developer should be informed that wastewater system capacity cannot be ensured until the issuance of the building permit. 28-2
   b. Wastewater contribution calculations are required before building permit is issued. 28-3
   c. Developer shall pay assessment fees for treatment plant expansion costs in accordance with ordinance setting forth such fees. The property is located in the Kahului Sewer Service Area. 28-4
   d. Developer is required to fund any necessary off-site improvements to collection system and wastewater pump stations. 28-5
   e. Indicate on the plans the ownership of each easement (in favor of which party). Note: County will not accept sewer easements that traverse private property. 28-6

f. Kitchen facilities within the proposed project shall comply with pre-treatment requirements (including grease interceptors, sample boxes, screens etc.) 28-7

g. Non-contact cooling water and condensate should not drain to the wastewater system. 28-8

h. The existing and proposed wastewater system in the Kahului Airport area shall remain privately owned and maintained. 28-9

If you have any questions regarding this memorandum, please contact Michael Miyamoto at 270-8230.

Sincerely,

KYLE K. GINOZA, P.E.
Director of Environmental Management

AM1032-13 OGG Draft EA Response

Kevin H Funasaki -Contractor to Kimberly K Evans 08/24/2012 12:42 PM
cc: Lynette Kawaoka, u_quoniou

Kim:

As attached, please find the Early Consultation response from the County of Maui - Dept. of Environmental Management for your use and information.

Thanks, Kevin

AM103213_Memo2012.08.15_From_Dept. of Env. Management.pdf

RESPONSE TO COMMENT 28 (AL-09)

Response 28-1:

Section 4.18.4, "Solid and Hazardous Waste", discusses waste generated during construction and how waste would be disposed. As stated in the Draft EA, construction and demolition activities would result in a temporary increase in solid waste generation at the Airport. However, recycling, salvage, reuse, and disposal options would be identified in a Solid Waste Management Plan in advance of all activities to minimize the amount of debris directed to local landfills. This plan would include the identification of locations for sorting materials for reuse and recycling. Hawaii State law (HRS 196-9) requires each State agency, to the extent practicable to design and construct all facilities to meet either the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver certification or other comparable building-rating system. DOT-A is designing the proposed ConRAC facility to achieve LEED Silver certification through incorporation of sustainable and energy efficiency measures, which would include reuse and recycling of materials.

Response 28-2:

Comment noted. As discussed in Section 4.7, "Water Quality", of the EA, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location; thus, water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. In addition, the car wash facilities associated with the proposed ConRAC facility would include a water recycling system to minimize wastewater generation. Also, DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.

Response 28-3:

As discussed in Section 4.7, "Water Quality", of the EA, water usage and wastewater generation is not expected to increase significantly under the Proposed Action. The overall water requirements of the proposed ConRAC facility are not expected to be significantly different than the combined requirements of the existing separate rental car facilities. Also, DOT-A submitted a letter dated December 28, 2012 to the Department of Public Works regarding its intent to waive the County building permit requirement for this project.

Response 28-4:

As discussed in the response to Comment 28-2 and Comment 28-3, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location.

Response 28-5:

As discussed in the response to Comment 28-2, wastewater generation is not expected to increase significantly under the Proposed Action. The Proposed Action would relocate existing functions at the Airport into one location.

Response 28-6:

The proposed ConRAC facility would tie into existing sewer lines on Airport property. No easements would be required.

Response 28-7:

Comment noted. If any kitchen facilities are constructed within the proposed ConRAC facility, they would comply with the County of Maui pretreatment requirements.

Response 28-8:

Comment noted. If any non-contact cooling water and/or condensate is generated by the proposed ConRAC facility it would be separated from the wastewater system.

(This would apply to the car wash wastewater as well. I know on some of the RAC improvements, this was a huge sticking point where DOH wants the car wash water dumped into the sewer system but the County DEM won't allow it. The result was having drywells to dump the water into, unless DEM has changed their stance...)

Response 28-9:

Comment noted. The proposed ConRAC facility would tie into existing sewer lines on Airport property. No changes to the wastewater system would be required.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0275

July 19, 2013

Mr. Clyde Almeida
Assistant Housing Administrator
Department of Housing and Human Concerns
Housing Division, County of Maui
35 Lunalilo Street, Suite 102
Wailuku, Hawaii 96793

Dear Mr. Almeida:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. The Hawaii Department of Transportation - Airports Division received your comment letter on September 4, 2012 (letter dated August 28, 2012), which noted that the Proposed Action is not subject to Chapter 2.96, Maui County Code, and that you had no additional comments on the Draft Environmental Assessment. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AL-11

DIR 1337

DEPARTMENT OF HOUSING AND HUMAN CONCERNS
HOUSING DIVISION
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
JO-ANN T. RIDAO
Director
JAN SHISHIDO
Deputy Director

35 LUNALILO STREET, SUITE 102 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7351 • FAX (808) 270-6284

August 28, 2012

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
2012 SEP -4 A 11:40

Mr. Glenn M. Okimoto, Ph.D., Director
State of Hawaii, Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Okimoto:

Subject: Preparation of an Environmental Assessment for Roadway and ConRAC Facility at the Kahului Airport, Maui, State project No. AM1032-13.

The Department has reviewed the preparation of an Environmental Assessment (EA) for the above subject project. Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. At the present time, the Department has no additional comments to offer. 30-1

Please call Mr. Veranio Tongson Jr. of our Housing Division at (808) 270-1741 if you have any questions.

Sincerely,

Clyde Almeida
Assistant Housing Administrator

cc: Director of Housing and Human Concerns

RESPONSE TO COMMENT 30 (AL-11)

Response 30-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0278

July 19, 2013

Mr. Paul Fasi
Staff Planner
Maui County Planning Department
Current Planning Division
2200 Main Street
One Main Plaza Building, Suite 619
Wailuku, Hawaii 96793

Dear Mr. Fasi:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division via e-mail on August 23, 2012, which noted that you had no comments on the proposed project. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
AL-12

Stephen Culberson

From:	kevin.h.funasaki-contractor@hawaii.gov
Sent:	Thursday, August 23, 2012 8:05 PM
To:	kimberly.k.evans@hawaii.gov
Cc:	lynette.kawaoka@hawaii.gov; Ura Quoniou
Subject:	Fw: Request for Comment Re: State Project No. AM1032-13

FYI: Forward from Maui County. Thanks, Kevin

---- Forwarded by Kevin H Funasaki-Contractor/AIR/HIDOT on 08/23/2012 03:04 PM ----

From: Gene Matsushige/AIR/HIDOT@HIDOT
To: Kevin.h.funasaki-contractor@hawaii.gov,
Date: 08/23/2012 02:07 PM
Subject: Fw: Request for Comment Re: State Project No. AM1032-13

Reply from Maui County

Gene Matsushige, Section Head
STATE OF HAWAII
Department of Transportation
Airports Division
400 Rodgers Blvd., Suite 700
Honolulu, Hawaii 96819-1880
Voice: (808) 838-8826
Cellular: (808) 281-8826
FAX: 838-8751
Email: gene.matsushige@hawaii.gov
gmspeedbird@gmail.com

---- Forwarded by Gene Matsushige/AIR/HIDOT on 08/23/2012 02:07 PM ----

From: "Paul Fasi" <Paul.Fasi@co.maui.hi.us>
To: <gene.matsushige@hawaii.gov>,
Cc: "Clayton Yoshida" <Clayton.Yoshida@co.maui.hi.us>
Date: 08/23/2012 12:50 PM
Subject: Request for Comment Re: State Project No. AM1032-13

Gene,

This is in response to your Dept's. request for comment dated July 23, 2012 (AIR-EC, 12.0279) on the Roadway Improvements and ConRAC Facility at the Kahului Airport.

At this time, the Planning Dept. has no comment. The Dept. would like to thank you for the opportunity to comment. Please call me at 808-270-7814 or respond to this email if you need further clarification.] 31-1

Sincerely,

Paul Fasi
Staff Planner
Maui Planning Dept., Current Div.

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RESPONSE TO COMMENT 31 (AL-12)

Response 31-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0290

July 19, 2013

Mr. Isaac Davis Hall
Attorney At Law
2087 Wells Street
Wailuku, Hawaii 96793

Dear Mr. Hall:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division on April 9, 2013 (letter dated April 8, 2013). Attached please find a copy of your comment letter and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
PC-01

ISAAC DAVIS HALL
ATTORNEY AT LAW
2087 WELLS STREET
WAILUKU, MAUI, HAWAII 96793
(808) 244-9017
FAX (808) 244-0775

Received
APR 09 2013

April 8, 2013

Via Email and U.S. Mail
jeff.chang@hawaii.gov
Department of Transportation, Airport Division,
400 Rodgers Boulevard, 7th Floor,
Honolulu, HI 96819
Contact: Mr. Jeffrey Chang

Re: Inadequacy of Draft Environmental Assessment ("DEA") and Proposed FONSI ("AFNSI") on the Kahului Airport Consolidated Rental Car ("ConRAC") Facility
TMK: (2) 3-8-001:019 (por) and 239
Island: Maui
District: Wailuku

Dear Hawaii Department of Transportation, Airports Division,

The Hawaii Department of Transportation, Airports Division ("HDOT-A"), as the proposing agency, published a Draft Environmental Assessment ("DEA") and Proposed FONSI ("AFNSI") on the Kahului Airport Consolidated Rental Car ("ConRAC") Facility in the March 8, 2013 issue of The Environmental Notice. A 30 day public review and comment period is provided by statute. Comments are due on or by April 8, 2013.

This comment letter is submitted on behalf of nearby residents and stakeholders who are adversely effected by aircraft noise generated through the operation of the Kahului Airport. The extension of Runway 5-23 to 7,000 feet and its use by larger, noisier aircraft will impose even more severe adverse noise impacts upon these residents. Numerous letters have already been sent on behalf of these residents to HDOT-A, the FAA, Hawaiian Airlines and Aloha Air Cargo objecting to any extension of Runway 5-23 and its use by aircraft that would increase adverse noise impacts. 14-1

The closing of existing Rent-A-Car facilities and their relocation to a new ConRAC facility is necessitated by the planned extension of Runway 5-23 to 7,000 feet. These are "connected" actions the impacts of which must be addressed as a single action, as a matter of law. Because the DEA fails to address these as connected actions the DEA is inadequate. A full 14-2 14-3 cont.

Environmental Impact Statement ("EIS") must be prepared now addressing the cumulative and long term impacts of the proposed lengthening of Runway 5-23 to 7,000 feet as it necessitates the closing of existing Rent-A-Car facilities and their relocation to a new ConRAC facility. 14-3 cont.

A. DESCRIPTION OF PROJECT IN DEA

The purpose of the proposed ConRAC Facility at the Kahului Airport is purportedly to provide the necessary space for the on-Airport rental car companies to accommodate the ready/return service and quick turnaround (QTA) facilities in a single location on the Airport. Excess rental car storage, dealer preparation, and heavy maintenance is proposed to continue to be accommodated at the existing rental car facility locations on the Airport. The proposed ConRAC will allegedly provide adequate on-Airport facilities for the rental car companies, reduce traffic and congestion on the terminal roadway system and enhance the overall customer experience at the Kahului Airport. 14-4

The construction of the new ConRAC facility and its related improvements are proposed to be located on approximately 17 acres of land at the Kahului Airport. The ConRAC facility is proposed to include approximately 4,200 parking stalls for rental car use, as well as a quick turnaround area, office, customer service area, and fueling and car wash areas for the various rental car operators.

B. PURPOSE OF A DEA

The purpose of a DEA is to determine, in a short document, whether or not a proposed project "may" have a significant effect on the environment. If the project "may" have a significant effect on the environment a full Environmental Impact Statement ("EIS") "shall" be prepared. HRS § 343-5(b)(1)(D) states that: "A statement **shall** be required if the agency finds that the proposed action **may** have a significant effect on the environment." ("Emphasis added"). In such circumstances the entry of a FONSI is unlawful. Under these circumstances, a full EIS is required by law. 14-5

C. THE DEA IS INADEQUATE AND CANNOT SUPPORT A FONSI AS A MATTER OF LAW AND FACT

The DEA reviews the ConRAC facility as a separate project, in isolation from other interrelated airport projects and thus commits illegal segmentation and "piecemealing" in an attempt to mask the full nature of this project. The DEA discusses the ConRAC facility only within the context of **existing** Kahului Airport facilities. The DEA entirely ignores all substantive discussion and 14-6

analysis of the Kahului Master Plan Update (March 2012)("the Update") that HDOT-A is currently conducting. The Update is available on HDOT's website.[1] 14-6 cont.

The Update presents HDOT-Airport's "Preferred Plan." Among the proposed Master Plan projects to be implemented in the 2015 through 2035 time frame are (1) extending Runway 5-23 to 7,000 feet and (2) closing existing Rent-A-Car facilities and constructing the new ConRAC facility. The Update shows the extended Runway 5-23 superimposed on top of a large portion of the existing Rent-A-Car facilities. The Runway 5-23 extension also brings with it the relocation of the commuter terminal and commuter parking area where Rent-A-Car Facilities now exist. The Rent-A-Car facilities must be relocated if Runway 5-23 is to be lengthened. See the "Preferred Plan" in the Update. 14-7

The extension of Runway 5-23 to 7,000 feet necessitates the closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility. The closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility are "necessary precedents" for a larger project, the extension of Runway 5-23 to 7,000 feet. The closing and relocation of the existing Rent-A-Car facilities and the construction of the new ConRAC facility are "phases or increments" of a larger total undertaking, the extension of Runway 5-23 to 7,000 feet. The DEA does not discuss ConRAC as it relates to the Update or, in particular, to any plan to extend Runway 5-23. Section 3.11 is included in the DEA purportedly to describe "reasonably foreseeable future actions." Again, the DEA neglects to mention the Preferred Plan of extending Runway 5-23 to 7,000 feet and hence neglects to address the cumulative and long-term impacts resulting from this proposed action. There is absolutely no discussion in the DEA about how these are "connected" actions. 14-8

HDOT-A agrees that an EIS is required by law to review and analyze the environmental impacts of all of the projects proposed in the Update in order to assess their long term and cumulative impacts. The DEA for the ConRAC facility is inadequate because it fails to analyze the environmental impacts of the proposed ConRAC facility within the context of the other projects proposed in the Preferred Plan presented in the Update. 14-9

D. THE DEA FAILS TO ADDRESS PHASED ACTIONS THAT ARE REQUIRED TO BE TREATED AS SINGLE ACTIONS

Hawaii's "Environmental Impact Statement Rules" include §11-200-7 entitled "Multiple or Phased Applicant or Agency Actions" which provides as follows: 14-10

[1] http://kahuluiairport.rmtowill.com/wp-content/uploads/2012/03/KAHULUI_AIRPORT_MASTER_PLAN_AND_NCP_Mar_13_2012.pdf

A group of actions proposed by an agency or an applicant shall be treated as a single action when:

A. The component actions are phases or increments of a larger total undertaking;
B. An individual project is a necessary precedent for a larger project;
C. An individual project represents a commitment to a larger project; or
D. The actions in question are essentially identical and a single statement will adequately address the impacts of each individual action and those of the group of actions as a whole.

In *Sierra Club v. Department of Transportation of the State of Hawai'i* ("Sierra Club I"), 115 Haw. 299, 167 P.3d 292 (2007) the Hawaii Supreme Court explained the purpose of this Rule:

> Rules like HAR § 11-200-7 are meant to keep applicants or agencies from escaping full environmental review by pursuing projects in a piecemeal fashion. See Guidebook at 19 ("The proposed action must be described in its entirety and cannot be broken up into component parts which, if each is taken separately, may have minimal impact on the environment. Segmenting a project in this incremental way to avoid the preparation of an environmental impact statement is against the law."); Kenneth A. Manaster & Daniel P. Selmi, 2 State Environmental Law § 13.10 (2006) (discussing the problem of "segmentation" or "piecemealing" of projects, including "situations . in which the agency tries to mask the full nature of its project or divides up what is clearly a larger action into smaller pieces that will be implemented simultaneously," "where a private applicant plainly has definite plans for additional, related projects in the future," or where "a project unquestionably will give rise to later, secondary actions by other individuals[.]").

14-10 cont.

This DEA is based upon illegal segmentation and piecemealing to avoid the preparation of an EIS and by attempting to mask the full nature of its project.

E. THE DEA NEGLECTS TO ADDRESS SECONDARY IMPACTS

The duty to study "secondary impacts" is also addressed in *Sierra Club v. Department of Transportation of the State of Hawai'i* ("Sierra Club I"), 115 Haw. 299, 167 P.3d 292 (2007). The Hawaii Supreme Court relied upon *McGlone v. Inaba*, 64 Haw. 27, 636 P.2d 158 (1981), and *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846 (9th Cir.2005). The Hawaii Supreme Court ruled:

14-11

McGlone makes clear that in making this determination, the agency must consider not just the effect of an action on the direct site to which the exemption applies (the "primary impact"), but also secondary impacts that are "incident to and a consequence of the primary impact."

14-11 cont.

This DEA fails to study secondary impacts as well. The proposal to extend Runway 5-23 to 7,000 feet necessitates the closing and relocation of the existing Rent-A-Car facilities. The impacts of both projects must be addressed at the same time. The DEA improperly has limited its scope to the primary impacts of the ConRAC facility alone.

F. THE DESCRIPTION OF THE "NO ACTION' ALTERNATIVE IS INADEQUATE

The DEA includes a "no action" alternative – described as "no changes to the existing rental car facilities at OGG would be implemented." See § 2.3.2.1. The necessity to relocate these facilities if Runway 5-23 is lengthened to 7,000 feet is never mentioned. Any "hard look" at the "no action" alternative would need to include an acknowledgment that the existing Rent-A-Car facilities must be closed and relocated if Runway 5-23 is to be extended to 7,000 feet. NEPA and HEPA require that alternatives — including the no action alternative — be given full and meaningful consideration. *Bob Marshall Alliance v. Hodel*, 852 F. 2d 1223 (9th Cir.1988). This "no action" alternative is meaningless without a full description of this alternative.

14-12

G. IMPACTS THAT THE DEA FAILS TO ADDRESS

1. Adverse Aircraft Noise Impacts Imposed Upon Kahului Residents

In extending Runway 5-23 to 7,000 feet, HDOT-A has stated that the runway will then be available for use by larger, noisier aircraft. The increase in severe adverse noise impacts that this extension will impose upon Kahului residents have not been studied and must be addressed and mitigated first.

14-13

2. Adverse Aircraft Noise Impacts Imposed Upon Spreckelsville Residents

The extension of Runway 5-23 to 7,000 feet will also impose greater adverse noise impacts upon Spreckelsville residents. These impacts have not been studied and must be addressed and mitigated first.

3. Adverse Impacts Imposed Upon Kanaha Wildlife Sanctuary

The proposed extension of Runway 5-23 to 7,000 feet will, in part, be in the direction of the Kanaha Wildlife Sanctuary thereby increasing adverse aircraft noise impacts upon the wildlife protected by this Sanctuary. These impacts have not been studied and must be addressed and mitigated first.

4. Adverse Impacts on Recreational Users of Kanaha Beach Park

14-13 cont.

In extending Runway 5-23 to 7,000 feet, HDOT-A has stated that the runway will then be available for use by larger, noisier aircraft. Runway 5-23 is adjacent to Kanaha Beach Park. The increase in adverse noise impacts that this extension will impose upon users of Kanaha Beach Park and to recreational uses facilitated by the Park have not been studied and must be addressed and mitigated first.

H. THE SIGNIFICANCE CRITERIA HAVE BEEN IMPROPERLY APPLIED

The Environmental Council has promulgated regulations on when proposed actions "may" have a significant effect on the environment. HAR 11-200-9 through 13, Subchapter 6, entitled "Determination of Significance." This Subchapter contains HAR § 11-200-12, entitled "Significance Criteria."

An agency is required to consider ".... the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action....[and] .... every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action." HAR § 11-200-12.A and B.

In addition, as is pertinent, according to HAR § 11-200-12.B., in most instances, an action shall be determined to have a significant effect on the environment if it:

14-14

1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;
2. **Curtails the range of beneficial uses of the environment;**
3. Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;
4. Substantially affects the economic welfare, social welfare, and cultural practices of the community or State;
5. Substantially affects public health;
6. Involves substantial secondary impacts, such as population changes or effects on public facilities;
7. **Involves a substantial degradation of environmental quality;**
8. **Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;**

9. Substantially affects a rare, threatened, or endangered species, or its habitat;
10. Detrimentally affects air or water quality or ambient noise levels;
11. Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

14-14 cont.

First, the "Significance Criteria" plainly mandate that HDOT-A is required to consider ".... the sum of effects on the quality of the environment, and shall evaluate the overall and cumulative effects of an action....[and] .... every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action." HAR § 11-200-12.A and B. The DEA fails to do this.

14-15

Second, the "Significance Criteria" require that "connected" actions be addressed. The DEA has failed to address the impacts resulting from the extension of Runway 5-23 to 7,000 feet, a clear connected action.

14-16

Third, once it is acknowledged that the proposed extension of Runway 5-23 to 7,000 feet is a connected action that must be addressed, there are multiple other "Significance Criteria" that are then in play that are not addressed in the DEA.

14-17

I. CONCLUSION

The DEA for the proposed ConRAC facility is inadequate as a matter of law and fact. Either HDOT-A must state in writing that it has abandoned its proposed project to lengthen Runway 5-23 to 7,000 feet or a full EIS must be prepared now addressing the environmental impacts of all connected actions together.

14-18

Sincerely yours,

Isaac Hall

Cc: Clients
Cc: Consultant:
Ricondo & Associates, Inc.
3239 Ualena Street, Third Floor
Honolulu, HI 96819
Contact: Stephen Culberson

RESPONSE TO COMMENT 14 (PC-01)

Response 14-1:

The Proposed Action analyzed in this EA is the development and operation of a consolidated rental car facility at Kahului Airport. The consolidated rental car facility would have no effect on the number or type of aircraft operations at the Airport and would not change the runway or airfield configuration. Thus, as stated in Section 4.1 of the EA, no change in aircraft noise would arise from development and operation of a consolidated rental car facility at Kahului Airport.

The Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 to 7,000 feet is only one of the alternatives the DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. However, alternatives to this project are still under study; despite what previous statements may have been made concerning the extension of Runway 5-23, there is no decision on a Runway 5-23 extension at this time. The project would be subject to environmental review under HRS 343 and the National Environmental Policy Act at such time that DOT-A and FAA agree that the planning required to identify and analyze feasible alternatives to the reconstruction of Runway 2-20 is sufficient to proceed.

Response 14-2:

As described in the response to Comment 14-1, the Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 is only one of the alternatives the DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. Alternatives to this project are still under study. Initial planning for the proposed ConRAC facility began in 2008 as part of the Statewide Car Rental Facilities Development Study conducted for Hawaii's major airports. Data collection, preliminary facility requirements, high-level concepts, and rough order-of-magnitude costs estimates were developed in 2009 and 2010 to determine financial feasibility. As part of the Statewide program, a site selection study conducted in 2011 identified potential feasible sites at Kahului Airport. Based on the current rental car facility requirements, growth in passenger enplanements and rental car demand, and projected future rental car facility requirements at Kahului Airport, DOT-A determined that implementation of a ConRAC facility at the Airport should proceed.

The EA identifies the purpose and need for the Proposed Action. The purpose of the Proposed Acton is to provide the necessary space for the on-Airport rental car companies to accommodate ready/return and quick turnaround facilities in a single location at the airport. The need for the proposed project is based on:

1) Providing adequate on-airport facilities for the rental car companies
2) Reducing traffic and congestion on the terminal roadway system
3) Enhancing the overall customer experience

The Proposed Action would result in the consolidation of most rental car operations into the ConRAC; however, the existing rental car facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the rental car facilities currently operate.

The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport.

Also, as described in the response to Comment 14-1, the Runway 5-23 extension is not part of the Proposed Action. The extension of Runway 5-23 is only one of the alternatives the DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. Alternatives to this project are still under study.

Response 14-3:

FAA Order 5050.4B[1] defines connected actions as follows:

(1) Connected actions. These are actions that are closely related to the proposed action and should be discussed in the same EIS. These actions:
   a) May automatically trigger other actions requiring EAs or EIS;
   b) Cannot or will not occur unless other actions occur at the same time or earlier; and
   c) Are independent parts of a large action but depend on the larger action for justification.

As indicated in Response 14-2, the proposed project would result in the consolidation of most rental car operations into the ConRAC; however, the existing rental car facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the rental car facilities currently operate. The Proposed Action would not trigger other actions that are not already identified and discussed in the EA and it is not dependent on other actions occurring at the same time or earlier.

The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport. FAA Order 5050.4B states that "For purposes of this Order, a project has independent utility when the project has logical starting and end points and would have a useful purpose without relying on other transportation improvements."[2] Thus, the Proposed Action has independent utility from any potential runway improvements at Kahului Airport.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

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1 U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, April 28, 2006, Paragraph 905.c.1.

2 U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, April 28, 2006, Paragraph 202.c.(4)(a).

Response 14-4:

Comment noted. The Purpose and Need for the Proposed Action are described in Chapter 1 of the EA.

Response 14-5:

Comment noted. Chapter 4 of the EA identifies the potential effects of the Proposed Action and reasonable alternatives, as required by HRS § 343 and the National Environmental Policy Act. Chapter 5.2 of the EA contains a significance criteria assessment for the Proposed Action, as required by HRS § 343.

The DOT-A is anticipating finding that the Proposed Action will not have a significant effect on the environment based on the findings and reasons set forth in the EA. HAR Section 11-200-10 provides that the agency (anticipated) determination and the findings and reasons supporting the (anticipated) determination be included in the EA.

Response 14-6:

As previously noted in response to Comments 14-2 and 14-3, the ConRAC facility would meet the stated purpose and need outlined in the EA document and is not dependent on the extension of Runway 5-23 or other projects to meet said objectives.

The Kahului Airport Master Plan Update referenced in the letter has not been completed. The document the commentator is referring to is a public presentation that was given by HDOT-A as part of the Master Plan Update process to solicit comments and input on the projects being considered as part of the Master Plan Update Study. Although the presentation refers to a Preferred Plan that includes extension of Runway 5-23, relocation of the rental car facilities, relocation of the commuter terminal, terminal expansion to the north, Lanui (Loop Road) reconfiguration, expansion of public and employee parking, expanded security road network, etc., the Master Plan Update for Kahului Airport has not been completed and a final recommended plan has not been agreed upon by HDOT-A nor presented to FAA. Additionally, the presentation identifies potential improvements for implementation between 2015 and 2035; the timing of the different projects will depend on demand, funding, and obtaining the necessary environmental and FAA approvals.

Response 14-7:

See response to Comments 14-2 and 14-6. As noted in the response to Comment 14-2, the existing rental car facilities would be maintained for heavy maintenance, overflow storage and administrative functions. The Proposed Action does not include demolition, relocation, or removal of these functions from the existing areas.

Response 14-8:

At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway

5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Because removal of the existing rental car facilities is not part of the Proposed Action nor is it required for the implementation of the Proposed Action, those actions are properly not analyzed in this EA.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

Response 14-9:

Each project that HDOT-A proposes to implement at Kahului Airport will need to undergo environmental review and analysis in compliance with HRS § 343 and the National Environmental Policy Act. As stated in the response to Comment 14-3, the proposed ConRAC facility project is a project that has independent utility; it does not depend on other projects for implementation.

Response 14-10:

As stated in the responses to Comments 14-2 and 14-3, the purpose and need for the ConRAC facility are defined and are not dependent on any other project. Additionally, as described in the response to Comment 14-6, the Kahului Airport Master Plan Update has not been completed, no decision has been made on a Runway 5-23 extension, and the Proposed Action is proposed regardless of whether Runway 5-23 is extended. The Proposed Action would result in the consolidation of most rental car operations into the ConRAC facility; however, the existing rental car area and facilities at Kahului Airport would continue to be used for maintenance, overflow storage, and administrative offices. The Proposed Action would not include demolition of the existing facilities nor allow any other development to occur where the existing rental car facilities operate. There will still be rental car facilities in place after the Proposed Action that a Runway 5-23 extension would have to take into account at the time any such extension is proposed and reviewed. The Proposed Action would not trigger other actions that are not already identified and discussed in the EA and it is not dependent on other actions occurring at the same time or earlier.

The Proposed Action is not dependent on any potential future runway improvements at Kahului Airport. It is a standalone project that would meet the stated purpose and need for the project and can be implemented regardless of whether any runway improvements are proposed or implemented at the Airport. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway 5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Because removal of the existing rental car facilities is not part of the Proposed Action nor is it required for the implementation of the Proposed Action, those actions are properly not analyzed in this EA.

Response 14-11:

See responses to Comments 14-2, 14-3, and 14-6. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives. If an alternative to extend Runway 5-23 is carried forward in a future environmental process that would necessitate utilizing the land occupied by the existing rental car facilities, the demolition of those facilities, as well as relocation of any functions being carried out in those facilities (e.g., if the Proposed Action is approved, those functions would include maintenance, overflow storage, and administrative offices), would be analyzed at that time. Those effects would be true secondary impacts, and would be analyzed as such in the appropriate environmental document. The extension of Runway 5-23 is not incident to or a consequence of the Proposed Action.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

Response 14-12:

See responses to Comments 14-2, 14-3, and 14-6. The Council on Environmental Quality (CEQ) states "The No Action alternative would mean the proposed activity would not take place, and the resulting environmental effects from taking no action would be compared with the effects of permitting the proposed activity or an alternative activity to go forward." The No Action alternative includes all approved projects (i.e., those actions that are reasonably foreseeable as being implemented). Because the extension of Runway 5-23 has not been approved at the federal, State, or local level, it is not a reasonably foreseeable project that should be included as part of the No Action alternative. Rather it is a project that may occur in the future, if the appropriate federal, State, and local environmental reviews are undertaken and approvals obtained.

Also, please see response to Comment 14-1 in regards to the extension of Runway 5-23.

Response 14-13:

See response to Comment 14-6. The extension of Runway 5-23 is not part of the Proposed Action. At such time that HDOT-A proposes to make runway improvements at Kahului Airport, a complete environmental analysis of the project would be undertaken, which would include a detailed analysis of project alternatives and the potential environmental effects associated with all reasonable alternatives.

Response 14-14:

A Significance Criteria Assessment in compliance with HRS § 343 is included in Section 5.2.

Response 14-15:

A Significance Criteria Assessment in compliance with HRS § 343 is included in Section 5.2.

Response 14-16:

As stated in the responses to Comments 14-2, 14-3 and 14-6, the extension of Runway 5-23 is not a connected action to the Proposed Action.

Response 14-17:

See response to Comments 14-2, 14-3, 14-6, and 14-16. The extension of Runway 5-23 to 7,000 feet is one option DOT-A is considering to preserve airline service to Maui while the necessary reconstruction of Runway 2-20 occurs. However, alternatives to this project are still under study. The project would be subject to environmental review under HRS 343 and the National Environmental Policy Act at such time that DOT-A and FAA agree that the planning required to identify and analyze feasible alternatives for the reconstruction of Runway 2-20 is sufficient to proceed.

Response 14-18:

See response to Comments 14-2, 14-3, 14-6, and 14-16.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0291

July 19, 2013

Mr. Tom Hutchison
OSP Engineer
Hawaiian Telcom, Inc.
P.O. Box 2200
Honolulu, Hawaii 96841

Dear Mr. Hutchison:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments received by the Hawaii Department of Transportation - Airports Division. We received your scoping comment letter dated August 22, 2012, and your Draft Environmental Assessment comment letter dated March 27, 2013. Both letters indicated that you had no comments on the proposed project. Attached please find a copy of your two comment letters and our responses, which are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Comment Letter No.
PC-02

Received

APR 01 2013

Hawaiian Telcom

March 27, 2013

RIcondo & Associates
3239 Ualena Street, Third Floor
Honolulu, HI 96819-1919

Attention: Ura Quoniou

Subject: Consolidated Rental Car Facllity
Kahului Airport
Draft EA

Dear Brett,

Thank you for allowing us to review and comment on the subject project. Your plans have been received and put on file.

Hawaiian Telcom, Inc. has no comment, nor do we require any additional information at this time. 15-1

Should you require further assistance, please call me at 242-5107.

Sincerely,

Tom Hutchison
OSP Engineer

cc: Gerry Saguicio, Section Manager

BICS File No. 1303-008 (3030)

RESPONSE TO COMMENT 15 (PC-02)

Response 15-1:

Comment noted.

Comment Letter No.
PC-03

Hawaiian Telcom

Network Engineering and Planning
OSP Engineering - Maui
60 South Church St
Wailuku, HI 96793
Phone 808 242-5102
Fax 808 242-8899

August 22, 2012

State of Hawaii
Airports Division, Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, HI 96819

Attention: Mr. Gene Matsushige

Subject: Roadway Improvement and ConRAC Facility
Kahului Airport
State Project No. AM1032-13

Dear Gene,

Thank you for allowing us to review and comment on the subject project. Your plans have been received and put on file.

Hawaiian Telcom, Inc. has no comment, nor do we require any additional information at this time.] 32-1

Should you require further assistance, please call me at 242-5107.

Sincerely,

Tom Hutchison
OSP Engineer

cc: Gerry Sagucio, Section Manager

BICS File No. 1208-037 (3030)

Honolulu Main office
PO Box 2200 • Honolulu • HI 96841

RESPONSE TO COMMENT 32 (PC-03)

Response 32-1:

Comment noted.

NEIL ABERCROMBIE
GOVERNOR

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1880

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
AIR-EC
13.0292

July 19, 2013

Mr. Ray Okazaki
Supervisor, Engineering
Maui Electric Company, Ltd.
P.O. Box 398
Kahului, Hawaii 96733-0698

Dear Mr. Okazaki:

Subject: Roadway Improvements and Consolidated Rental Car Facility (ConRAC)
Kahului Airport
State Project No. AM1032-13

Re: Response to comments received on the Draft Environmental Assessment

Thank you for your participation in the Draft Environmental Assessment for the Proposed Consolidated Rental Car (ConRAC) Facility. This letter is in response to your comments sent to the Hawaii Department of Transportation - Airports Division dated October 29, 2012. A copy of your comment letter and our response are attached and are included in the Final Environmental Assessment.

Should you have any questions, please call Mr. Gene Matsushige, Head Construction Engineer, at 838-8826.

Aloha,

FORD N. FUCHIGAMI
Deputy Director - Airports

Enclosure: Comment Letter and Responses

Maui Electric Company, Ltd.•210 West Kamehameha Avenue•P O. Box 398•Kahului, Maui, HI 96733-0698•(808) 871-8461

Comment Letter No.
PC-04

October 29, 2012

Mr. Gene Matsushige, Airports Division
Engineering Branch
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Subject: Roadway Improvements and ConRAC Facility
Kahului Airport
Kahului, Maui, Hawaii

Dear Mr. Matsushige,

Thank you for allowing us to comment on the subject project.

In reviewing our records and the information received Maui Electric Company (MECO), we highly encourage the customer's electrical consultant to submit the electrical demand requirements and project time schedule as soon as practical so that we can properly evaluate the impact to our facilities and provide service on a timely basis. In addition, we highly encourage the customer to contact Steven Rymsha at 872-3292 of our Renewable Energy Department for any interconnection requirements as necessary to accommodate the customer's photovoltaic (PV) system. 33-1

Should you have any questions or concerns, please feel free to contact Kelcie Kawamura at 872-3246.

Sincerely,

R Okazaki

Ray Okazaki
Supervisor, Engineering

RESPONSE TO COMMENT 33 (PC-04)

Response 33-1:

Comment noted. DOT-A will coordinate electrical demands for the project as the design for the proposed ConRAC facility progresses.