MEMORANDUM

To: Keith E. Kawaoka, Acting Director
Office of Environmental Quality Control

From: Suzanne Case, Chairperson
Department of Land and Natural Resources

Subject: Declaration of exemption from the preparation of an environmental assessment (EA) per Hawaii Administration Rules (HAR) §11-200.1-15 (a) and (c)(3)
Construction and location of single, new, small facility or structure for the Honolulu Museum of Art (HoMA) Art School Program, Art Learning Center
TMK: (1) 2-4-002:020

Executive Summary

The Honolulu Museum of Art (HoMA), the applicant, is a 501(c)(3) organization founded in 1922 with the mission “to create relevant and transformative experiences through the study, preservation, presentation and creation of art.”

The museum is located on state lands where it operates several facilities and programs, which are leased to the museum by the Department of Land and Natural Resources through its Land Division (General Lease No. 5149). One of the parcels on which HoMA operates is TMK [1] 2-4-002:020 (1037 S. Beretania St.). The historic Linekona Building is located on this parcel. First built in 1908, the Linekona Building is listed on both the Hawaii Register of Historic Places (SIHP # 50-80-14-1339) and the National Register of Historic Places (#80001279).
Applicant

HoMA has received grant and donor funding for the construction of single, new, small facility for the Honolulu Museum of Art (HoMA) Art School Program, Art Learning Center. HoMA, the applicant, is proposing an expansion to the existing kiln house to create an Art Learning Center with glazing classroom spaces. While this new small facility would not be attached to the Linekona Building, it would share a parcel and be in reasonably close proximity to the historic structure. Therefore, the work will be in compliance with The Secretary of the Interior’s Standards for the Treatment of Historic Properties as to not adversely affect any of the character defining features of the historic building.

Accepting Authority

The Department of Land and Natural Resources (Department) is both landowner and accepting authority under Hawaii Revised Statutes (HRS) Chapter 343.

The Department, having reviewed the proposed activities and following environmental considerations, has determined this project to fall within the categories listed in HAR § 11-200.1-15. As such, the Department is exempting the proposed activities described in this memo from preparation of an environmental assessment (EA), and submits this notice to OEQC for publication in the July 8, 2021 The Environmental Notice.
Introduction

The Honolulu Museum of Art (HoMA or the Museum) is a 501(c)(3) organization founded in 1922 with the mission “to create relevant and transformative experiences through the study, preservation, presentation and creation of art.” For close to 100 years, this nonprofit organization has offered art, history, culture and education services in Honolulu.

The museum is located on state lands where it operates several facilities and programs, which are leased to the museum by the Department of Land and Natural Resources through its Land Division (General Lease No. 5149). One of the parcels on which HoMA operates is TMK [1] 2-4-002:020 (1037 S. Beretania St.). The historic Linekona Building is located on this parcel. First built in 1908, the Linekona Building is listed on both the Hawaii Register of Historic Places (SIHP # 50-80-14-1339) and the National Register of Historic Places (#80001279).

Condition 10 of the subject lease stipulates that “[t]he Lessee shall, at its own expense, keep, repair and maintain all buildings and improvements now existing or hereafter constructed or installed on the demised premises in good order, condition and repair, reasonable wear and tear excepted.” As a historic building, maintenance of the building is required to comply with The Secretary of the Interior’s Standards for the Treatment of Historic Properties for the building to maintain the integrity required to remain on the state and national registers.

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Project Description

HoMA, the applicant, is proposing an expansion to the existing kiln house to create an Art Learning Center with an indoor classroom and usable outdoor space and site drainage improvements. This proposed work is being reviewed by the Department as both landowner and accepting authority under Hawaii Revised Statutes (HRS) Chapter 343. This proposed work is concurrently being reviewed by the State Historic Preservation Division per HRS Chapter 6E-7 and 6E-8. All proposed work shall comply with The Secretary of the Interior’s Standards for the Treatment of Historic Properties and be overseen by consultants qualified under The Secretary of the Interior’s Professional Qualification Standards.
Land Division is seeking SHPD review of the project.

The existing kiln house was built in 1989 to contain electrical and gas kilns that support the ceramic art program. It is a separate, single story 514 sq. ft. CMU structure behind the Art School (Linekona) building, situated in a paved parking area ("Project Site"). It has a deteriorating corrugated metal roof and the exterior is painted split faced CMU with a plaster base and precast concrete windowsills.

**Identification and Analysis of Impact and Alternatives Considered**

The single story, 2000 sq. ft. expansion to the kiln house, is to be built within the existing paved parking lot area. Ceramic art activities which currently take place in the existing basement studio will be relocated to the expansion. This includes the glazing studio classroom, dry mixing, spray booth, and storage rooms. The exterior will be painted split faced CMU, with a plaster base, and painted precast concrete windowsills, to match the existing kiln house. Door and windows are painted wood, to match existing. Roof trusses form a sloped mansard roof so that mechanical equipment can be housed within the roof well, and corrugated metal roofing is to match existing.

The project proposes to keep most of the kiln house structure, replace the front door with matching wood doors, remove and replace the roof with new roof trusses, deck, and corrugated metal roof, similar to existing. An opening on the east facing wall will be cut to provide access to the expansion.

In order to construct the expansion, an existing monkeypod tree needs to be removed. It is too large to be relocated per the Tree Assessment Report prepared by Tree Solutions and Environmental Consulting Services, Inc. dated March 1, 2021. While the tree is large, it is not on the City and County of Honolulu's Register of Exceptional Trees. The tree is a safety hazard for the building and students, due to the large branches and amount of debris that falls. The root system has uplifted the asphalt paving creating an uneven surface in surrounding areas. The severe condition exacerbates the problem of surface storm water flowing into the basement level of the historic Linekona Building and causes water damage to the interior. Debris from the tree clogs the drain lines meant to divert surface storm water away from the building. In order to control drainage and divert water away from the historic Linekona Building, the area will be repaved with concrete pavers in place of the asphalt paving. Existing roof downspouts will connect to new subgrade pipes that lead to four seepage wells towards the south of the property so that storm water may be retained and properly handled onsite.

HoMA considered a number of site factors for the configuration of the Art Learning Center including the location of major underground utilities, ADA access and general access to the Art School from the parking lot, and architectural appearance. The building cannot move further east toward the visitor parking lot because of the fire and domestic water service lines that cross the
site. The building cannot move further south toward Young Street because of the existing row of trees there. Extending the building toward Young Street would block access from the visitor parking to the Art School entrance and also alter the appearance of the historic Linekona Building when viewed from Victoria Street because it becomes visible. In the proposed configuration, the Art Learning Center remains out of view behind the Linekona Building, keeps within the boundaries created by existing main water lines, and does not block visitor access from the parking lot to the main entrance.

Compliance Requirements

Hawaii Revised Statutes ("Haw. Rev. Stat.") Chapter 343 and the Hawaii Administrative Rules ("HAR") §11-200.1 subchapter 8, promulgated thereunder, exempt specific types of action from the preparation of an environmental assessment because the action will have minimal or no significant effect on the environment.

§11-200.1-15 General types of actions eligible for exemption. (a) Some actions, because they will individually and cumulatively probably have minimal or no significant effects, can be declared exempt from the preparation of an EA.

(b) Actions declared exempt from the preparation of an EA under this subchapter are not exempt from complying with any other applicable statute or rule.

(c) The following general types of actions are eligible for exemption: . . .

(1) Operations, repairs, or maintenance of existing structures, facilities, equipment, or topographical features, involving minor expansion or minor change of use beyond that previously existing;

(2) Replacement or reconstruction of existing structures and facilities where the new structure will be located generally on the same site and will have substantially the same purpose, capacity, density, height, and dimensions as the structure replaced;

(3) Construction and location of single, new, small facilities or structures and the alteration and modification of the facilities or structures and installation of new, small equipment or facilities and the alteration and modification of the equipment or facilities, including, but not limited to: (A) Single-family residences less than 3,500 square feet, as measured by the controlling law under which the proposed action is being considered, if not in conjunction with the building of two or more such units; (B) Multi-unit structures designed for not more than four dwelling units if not in conjunction with the building of two or more such structures; (C) Stores, offices, and restaurants designed for total occupant load of twenty
individuals or fewer per structure, if not in conjunction with the building of two or more such structures; . . . .

Additional Required Permits and Approvals

HRS Chapter 6E-7, 6E-8, and 6E-42 Review (State Historic Preservation Division)
- HICRIS Project Number: 2021PR00200
- While the existing kiln house is not a historic building, the project manager consulted with SHPD Architecture Branch Chief Tanya Gumapac McGuire on 11/13/20 and 1/28/21 regarding this project due to its proximity to the historic Linekona building.

Thomas Square Special District Permit (City and County of Honolulu, Urban Design Branch, Department of Planning and Permitting)
- The architect consulted with Joyce Shoji on 2/1/21 and confirmed that the kiln house expansion and tree removal are classified as minor permit, while the infrastructure improvements are classified as exempt per the Honolulu Land Use Ordinance Section 21-9.70-5.

Building Permit and Sitework Permit (City and County of Honolulu, Department of Planning and Permitting)
- Building Permit Application Number: A2021-04-1357
- Sitework Permit Application Numbers: A2021-04-1358, A2021-05-0227

Accessibility consultation (State Department of Health, Disability and Communication Access Board)

Existing Environment

The area in and around the subject parcel, which is located at the transition of the uplands of Makiki to the north (mauka, or inland, direction) and the coastal flatlands of Kaka‘ako to the south (makai, or seaward, direction), consists of level terrain at an elevation of approximately 20 feet (6.1 meters) above mean sea level. The natural landscape has been developed and altered in conjunction with the urbanization of Honolulu for at least 150 years. The prominent Pūowaina (Punchbowl), a rejuvenation (tuff) cone dating from around 10,000 years ago, is about a half mile to the north of the project area (Macdonald et al. 1983). There are no through-flowing streams in or around the subject parcel; the local hydrology was long ago changed by diversion and channelization of freshwater flow. By O‘ahu standards, the area in and around the subject parcel is relatively dry (semi-arid), with mean annual rainfall of approximately 30 inches (762 millimeters) (Giambelluca et al. 2013). Naturally-occurring soils in the project area consist entirely of Makiki Clay Loam, which, if irrigated, is good for cultivation/agriculture. [Attach and reference suitable regional, location, and site maps such as Flood Insurance Rate Maps,
Floodway Boundary Maps, United States Geological Survey topographic maps, or state sea level rise exposure area maps.

Given its long history of alteration and urbanization, the project area does not contain any naturally-occurring vegetation, but, instead, includes the following introduced and ornamental landscaping varieties. The existing landscape consists predominantly of large, mature monkeypod trees and a mock orange hedge at the perimeter of the site, with shower trees at the parking lot. Other plantings include banyans, a variety of palms, yellow poinciana, podocarpus, plumeria, ohai ali'i, and tiare gardenia, among others. While some trees are large, they are not on the City and County of Honolulu's Register of Exceptional Trees. The variety and density of planting is higher in the interior courtyards where it does not detract from the serene, park qualities of Thomas Square and the Honolulu Museum of Art.

HoMA informed The Outdoor Circle of the project and plans to remove the existing monkeypod tree on March 3, 2021. They acknowledge comments received on March 26, 2021. However, given the site constraints and factors previously described in the Project Description, the proposed siting of the Art Learning Center keeps it within the boundaries created by existing main water lines, avoids disturbing an existing row of trees along Young Street, and does not block visitor access from the parking lot to the main entrance.

Landscape Architect Walters Kimura Motoda has observed that there are numerous large canopy trees on the property. The areas along Beretania and Young Streets already have mature monkeypod trees and it is inadvisable to plant any new trees on the Victoria Street side which would detract views of the front elevation of the Linekona Building. Therefore, as a mitigation measure, a replacement tree is proposed to be planted in a parking lot island that currently does not have a tree. It is a shower tree to match the plant palette of existing parking lot trees.

**Determination**

Pursuant to §11-200.1-13 (b), in determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected impacts, and the proposed mitigation measures. In most instances, an action shall be determined to have a significant effect on the environment if it may:

(1) Irrevocably commit a natural, cultural, or historic resource;

*The proposed action occupies a parcel of land that has been in education/museum use for 112 years. The adjacent historic building will not be affected.*

(2) Curtail the range of beneficial uses of the environment;

*The proposed action will benefit the surrounding community and is consistent with the surrounding land use.*
(3) Conflict with the State's environmental policies or long-term environmental goals established by law;

*The environmental policies promote conservation of natural resources and an enhanced quality of life for all citizens. The proposed action will benefit the community by having more classes conducted on the expanded classroom.*

(4) Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;

*The proposed action will only have positive effects on the social welfare of the community.*

(5) Have a substantial adverse effect on public health;

*The proposed action will not have any adverse effect on public health.*

(6) Involve adverse secondary impacts, such as population changes or effects on public facilities;

*No adverse secondary impacts, such as population changes or effects on public facilities or population are expected.*

(7) Involve a substantial degradation of environmental quality;

*The proposed action will go through the permit process, including landscaping plan. It will not degrade the surrounding environmental quality.*

(8) Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions;

*The proposed action is not part of a larger improvement project. It is not expected to have any substantial adverse effect.*

(9) Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat;

*There are no known rare, threatened, or endangered species or its habitat in the vicinity.*

(10) Have a substantial adverse effect on air or water quality or ambient noise levels;

*It is not expected the proposed action will create any substantial adverse effect on air, water or noise, other than short term temporary impacts during the construction phase.*

(11) Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

*The subject location is not situated in these environmentally sensitive areas.*
(12) Have a substantial adverse effect on scenic vistas and view planes, during day or night, identified in county or state plans or studies;

*The proposed action will not cause any adverse effect on any view planes, during day or night.*

(13) Require substantial energy consumption or emit substantial greenhouse gases.

*The proposed action is not expected to impact the power demand.*

**Consulted Agencies**

The Department solicited comments from the following State and City and County of Honolulu (C&CH) agencies and community organizations. Any comments received will be included in the final version of this document:

<table>
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<tr>
<th>Agency</th>
<th>Comment</th>
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<tbody>
<tr>
<td>State Historic Preservation Division</td>
<td>Currently under review by SHPD.</td>
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<tr>
<td>Department of Planning and Permitting, C&amp;CH</td>
<td>Currently under review by DPP.</td>
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<tr>
<td>The Outdoor Circle</td>
<td>Outdoor Circle opposed the removal of one of the trees. An additional survey was completed, and it was determined that the tree cannot be saved due to its proximity to the building. It's not an exceptional tree. It was also determined that there are sufficient trees lining the property. The plan will undergo additional review by DPP as part of the Thomas Square Special District application.</td>
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**Findings and Determination**

The Department, having reviewed the proposed activities and following environmental considerations, has determined this project to fall within HAR § 11-200.1-15(c) (1), (2), and (3). As such, pursuant to HAR § 11-200.1-15(c), the Department exempts the proposed activities described in this memo from preparation of an environmental assessment.