EXEMPTION NOTICE FORM

Hāmākua Health Center, Inc.
45-549 Plumeria Street
Honoka'a, Hawai'i, 96727

TO: 1. Agency-Maintained Public Files for Chapter 343 HRS Exemption Determinations
2. Office of Environmental Quality Control, if publication by OEQC is desired
3. [Applicant, if applicable+]

FROM: Director of Hāmākua-Kohala Health (HKH)

SUBJECT: Exemption Notice for Hāmākua Health Center Building Demolition Project

DATE: 1/5/2021

AGENCY OR APPLICANT ACTION

Check applicable box

☐ This exempted action is an agency action as defined by Section 343-5(b), Hawai'i Revised Statutes (HRS), and Section 11-200.1-8, Hawai'i Administrative Rules (HAR),

☒ This exempted action is an applicant action as defined by Section 343-5(e), HRS, and Section 11-200.1-9, HAR

EXEMPTION TYPE:

The Exemption Notice for the action described below is based on the general types enumerated in Section 11-200.1-15(c), Hawai'i Administrative Rules (HAR), Exemption Type **(6) Demolition of structures, except those structures that are listed on the national register or Hawai'i Register of Historic Places** .

DESCRIPTION OF ACTION

Proposing Agency or Applicant: Hāmākua-Kohala Health (HKH)

Project Name & Address/Location: Hāmākua Health Center Building Demolition Project; located at 45-549 Lehua Street in Honoka'a, Hawai'i.

Anticipated Start Date: 3/15/2021

Anticipated End Date: 7/5/2021

Island and District: Hawai`i Hamakua

Tax Map Key(s) and other geolocation means: TMK (3) 4-5-010:089

All Necessary Permits and Approvals: County of Hawaii Department of Public Works Demolition Permit, Clearing and Grubbing Permit; State Department of Health Community Noise Permit

NARRATIVE

Describe the action and why it qualifies for the exemption: The Project involves demolishing the existing infirmary building so that a new health care facility building can be constructed to replace it. The HKH Project proposes to:

1. Demolish old infirmary building due to mold, termites, lead, asbestos, and flooding
2. Clear and grub the site
3. Relocate and reconstruct existing utilities affected by the demolition.

The proposed project is exempt from the requirement to complete an Environmental Assessment (EA), as per HAR 11-200.1-15(c)(6), which states: "The following types of actions are eligible for exemption: Demolition of structures, except those structures that are listed on the national register or Hawai'i Register of Historic Places." The existing infirmary building of the Hāmākua Health Center is not listed on the national register or Hawai'i Register of Historic Places; therefore, the demolition of the building is exempt from the preparation of an EA.

RECEIVING ENVIRONMENT

Describe the site, including any impacts on the receiving environment: The Project site is located in Honoka'a, approximately 15 miles east-northeast of the town of Waimea on the Island of Hawai'i. The proposed action is located on lands owned and managed by the Hāmākua Health Center, Inc. The affected lands are included in the State Land Use Urban District. No significant environmental impacts on the Project site or to the surrounding community would be anticipated from the Proposed Action.

ENVIRONMENTAL ANALYSIS

I have considered the potential effects of the proposed project and all related activities against the criteria checked below:

	Not Applicable
☒ Land Use and Zoning Conformance	☐
☒ Traffic (Vehicles, Bicycles, Pedestrian)	☐
☒ Infrastructure (Roads, Buildings, Utilities)	☐
☒ Air Quality Pollutant Emissions	☐
☒ Noise Emissions	☐
☒ Solid, Hazardous, and Liquid Waste Management	☐
☒ Social	☐
☒ Economic	☐
☒ Health and Safety	☐
☒ Recreation	☐
☒ Public Beach Access	☐
☒ Cultural Resources and Practices	☐
☒ Visual/Aesthetic	☐
☒ Environmental Justice	☐
☒ Rare, Threatened, and/or Endangered Species	☐

☒ Surface and Ground Water Resources	☐
☒ Wetlands	☐
☒ Floodplains	☐
☒ Riparian/Coastal Resources	☐
☐ Other	☒

Comments/summary of impact analysis:
Land Use and Zoning Conformance: The project site is located within the State Land Use Urban District. The Urban District includes lands characterized by "city-like" concentrations of people, structures, and services. The Proposed Action is compliant with the Urban designated zone set by the State Land Use Law.

Traffic (Vehicles, Bicycles, Pedestrians): The Proposed Action would not take place in the public-right-of-way. However, there would be a temporary and slight increase in vehicular traffic along Lehua Street as demolition equipment are brought to the staging area and project site, as well as during the transport of debris. The slight increase in traffic also includes the transport of workers to and from the project site during the Proposed Action's working hours. These impacts would be minimal and temporary during the short-term duration of the Proposed Action.

Infrastructure (Roads, Buildings, Utilities): The Proposed Action consists of the demolition of the old infirmary building and the relocation and reconstruction of existing utilities affected by the demolition. Public roads, buildings, or utilities outside of the project site would not be impacted.

Air Quality Pollutant Emissions: Short-term demolition-related impacts to air quality are anticipated with the implementation of the Proposed Action. During demolition, potential emission sources that may affect air quality include: Diesel and/or gasoline-powered demolition equipment and motor vehicles that contribute to additional carbon monoxide and carbon dioxide, and fugitive dust emissions resulting from demolition. It is not anticipated that Federal or State Ambient Air Quality Standards (AAQS) would be exceeded during demolition activities.

Noise Emissions: Noise generated during demolition would be short-term and limited to the project site. Noise would be generated by demolition equipment used to implement the Proposed Action. Demolition equipment would include excavators, trucks, and other heavy equipment. Earthmoving equipment (e.g., bulldozers and diesel-powered trucks) would probably be the loudest equipment used during demolition.

Solid, Hazardous, and Liquid Waste Management: A Hazardous Material Survey was conducted for the Proposed Action. Based on the analysis of 48 asbestos-suspected samples, 54 lead-suspected samples, 4 arsenic-suspected samples, and a visual inspection of light ballasts, fluorescent light tubes, and light switches, the following hazardous materials were identified:

Summary of Hazardous Material Findings

	ACM	LCP	LBP	Lead	Arsenic	PCB#	Mercury#
Hamakua Health Center							
Interior	◙	◙		◙*	◙	◙	◙
Exterior		◙	◙				

◙ indicates presence of hazardous material
*The fabric on the walls of Room 5 was identified as containing lead.
#Room 1 was inaccessible at the time of this survey. The electrical components in Room 1 are assumed to be contain PCB ballasts and mercury tubes and switches. Contractor must determine PCB and mercury content prior to disturbance.
ACM – Asbestos-Containing Material
LBP – Lead-Based Paint, ≥5,000 mg/kg
LCP – Lead-Containing Paint, <5,000 mg/kg
PCB – Polychlorinated Biphenyls

It is required that properly trained employees perform demolition and construction work and that construction work follows recommendations by the Occupational Safety and Health Administration (OSHA). All waste disposal must be disposed of in accordance with applicable regulations. OSHA recommendations for working with and disposal of hazardous materials are provided below in **MITIGATION**.

Social: The Proposed Action is to demolish the old infirmary building as it has lead, asbestos, termites, and flooding that has become a health and safety issue to the community. In addition, the site has been broken into by houseless people and drug dealers and is located right next to a children's park. The Proposed Action would not increase the population of the area or have an adverse social impact to the community. The Proposed Action would remove the deteriorating infirmary building and lead to future construction of a new health care facility building to replace it in order to provide and expand health care services to the community.

Economic: Demolition activities would result in a short-term economic impact due to construction-related spending and employment. Additionally, direct demolition activities would result in an overall short-term positive economic impact by stimulating indirect and induced employment within other local industries.

Health and Safety: The Proposed Action is to demolish the old infirmary building as it has lead, asbestos, termites, flooding, and has been a location for break-ins which has led it to become a health and safety issue to the community and to the adjacent park. The Proposed Action would beneficially impact the surrounding community from the demolition of this building, and the future construction of a new health care services facility.

Recreation: The project site is adjacent to Honoka'a Park. Activities at Honoka'a Park include the use of baseball and softball fields, multi-purpose sports field, children's playground, skate park, and sports complex. The park also includes basic facilities such as public restrooms, water fountains, vehicle parking, and trash cans. All demolition-related activities including the staging of demolition equipment and debris would all take place on the project site and would not adversely impact the use or access to the surrounding recreational facilities.

Public Beach Access: The Proposed Action is not located near the shoreline or any public beach access, therefore, the Proposed Action would not impact public beach accesses.

Cultural Resources and Practices: The existing infirmary building of the Hāmākua Health Center is not listed on the national register or Hawai'i Register of Historic Places; therefore, the demolition of the building is exempt from the preparation of an EA. The entire site has been completely graded and in urban use for over 40 years. As such, there are no known historical, cultural, or archaeological sites or resources located on the project site, and there is no evidence of any traditional and customary Native Hawaiian rights being practiced on the site. The Proposed Action would all take place on the property and would not adversely impact any cultural resources or practices outside of the project site.

Visual/Aesthetic: The existing infirmary building is a one-story structure that is no taller than the maximum allowable building height in the area. The existing scenery surrounding the project site include large trees, Honoka'a Park, and the existing 2-story Hāmākua Health Center across the street. There are no identified scenic and open space preserves in the area. The Proposed Action would have no impact to visual resources as the Proposed Action would not alter natural landforms or significantly block existing views.

Environmental Justice: The Proposed Action is abandoned and not located on or near any environmentally sensitive areas. Additionally, the Proposed Action would beneficially impact the surrounding community from the demolition of this building, and the future construction of a new health care services facility to serve more underserved communities. The project site has been previously disturbed by the construction of the old infirmary building; therefore, the Proposed Action would not significantly impact or exacerbate environmental justice issues.

Rare, Threatened, and/or Endangered Species: The project site in Honoka'a town is located within the State Land Use Urban District and not located near any State conservation districts. The Proposed Action includes clearing and grubbing of the project site. However, there are no known Federal or State listed threatened or endangered flora and fauna species that inhabit the project site nor are there critical resources at the project site needed for the species to survive. Impacts to migratory birds, the Hawaiian Hoary Bat, or the Hawaiian Short-eared Owl would be minimal as demolition activities would be short-term and conducted during appropriate times.

Surface and Ground Water Resources: There are no surface or ground water resources on or adjacent to the project site. The Proposed Action and the staging of construction equipment and debris would all take place on the project site. Demolition plans would include BMPs to minimize erosion and sediment loading at the project site during and after demolition, as well as measures to contain runoff and fugitive dust on-site to prevent any from being directed to surface or ground water resources. Therefore, the Proposed Action would not have any significant adverse impact on surface and ground water resources.

Wetlands: There are no known wetlands on or adjacent to the project site, therefore, the Proposed Action would not impact wetlands.

Floodplains: The subject parcel is in an area designated as Zone X on the Flood Insurance Rate Map (FIRM) by the Federal Emergency Management Agency (FEMA). Zone X is an area determined to be outside the 500-year floodplain. Therefore, the Proposed Action would not impact or exacerbate flooding in this area.

Riparian/Coastal Resources: The project site is not located near the coast or any riparian streams or rivers, therefore, the Proposed Action would not impact riparian and coastal resources.

MITIGATION

Describe all mitigation measures and best management practices (BMPs) planned to address impacts during the project activities and after project completion:

Land Use and Zoning Conformance: The Proposed Action would abide by all uses allowed for the urban designated zone set by the State Land Use Law. All demolition activities would be conducted during appropriate times and days of the week (i.e., weekdays and during daytime hours) as to not significantly impact the surrounding community.

Traffic (Vehicles, Bicycles, Pedestrians): No traffic control plan is expected as the Proposed Action would not take place in the public-right-of-way. The transportation of construction equipment, materials, and debris would adhere to State and County public roadway safety rules which include proper use of reflectors and signals, adhering to all roadway signals and speed limits, and ensuring that the maximum legal dimensions for size and weight are met for the movement of vehicles and loads on public roadways. All demolition materials and debris loads are to be properly secured during transportation to prevent dust, debris, or other adverse conditions from affecting public roadways. Additionally, the transportation of demolition equipment and debris would take place during acceptable traffic periods to minimize potential disruption to local traffic.

Infrastructure (Roads, Buildings, Utilities): BMPs for the transportation of large demolition equipment and debris, air quality, and stormwater runoff would be utilized at the project site to prevent adverse impacts to the use and access of surrounding public roads, buildings, and utilities. The contractor would work with utility providers to ensure that public utilities would be not be significantly impacted during the relocation and reconstruction of existing utilities affected by the demolition.

Air Quality Pollutant Emissions: A dust control plan would be developed and implemented to minimize fugitive dust emissions during demolition. The plan would include some or more of the following measures: watering or applying dust suppressants at active work areas and project access roads, installing dust screens or wind barriers around the construction site, cleaning nearby pavements and roads affected by construction, covering open trucks carrying construction material and debris, and requiring construction equipment to have emission control measures.

Noise Emissions: The contractor would coordinate with the State Department of Health's Indoor and Radiological Health Branch to ensure that an approved Community Noise Permit is obtained, as may be applicable to the project. Noise generated from demolition activities and the use of machinery would be minimized by implementing the following measures: requiring contractors to adhere to State and County noise regulations, ensuring that demolition activities would be conducted on weekdays and in daytime hours, and that in the event that work occurs

after normal working hours (e.g., at night or on weekends), or if permissible noise levels are exceeded, appropriate permitting and monitoring, as well as development of administrative and engineering controls, would be employed.

Solid, Hazardous, and Liquid Waste Management: Based on the Hazardous Material Survey for the Proposed Action, the following general and hazard-specific recommendations address OSHA and other applicable federal requirements for working with and for the disposal of hazardous materials.

General Recommendations:

- Employees must anticipate hazards and utilize appropriate engineering controls and personal protective equipment (PPE).
- Employees must clean the work area thoroughly using wet methods and a high-efficiency particulate air (HEPA) vacuum. Dry sweeping or air blowing of asbestos, lead, and arsenic-containing debris and dust must be avoided.
- The work site must be maintained as a controlled regulated area and supervised by a competent person at all times.
- Visually inspect the work area to ensure that all asbestos, lead, and arsenic-containing debris and dust has been properly removed and that the project site is free of the hazard.

Asbestos-Containing Material:

- Employees must provide and require the use of appropriate PPE for any employee exposed to airborne concentrations of asbestos that exceed OSHA regulatory limits.
- Employees must utilize respiratory protection until the initial exposure monitoring assessment documents safe working levels of airborne asbestos. Additional periodic exposure monitoring may be required.
- An initial exposure monitoring assessment should be carried out when workers are disturbing asbestos to ensure that they are no exposed to airborne asbestos concentrations greater than the Permissible Exposure Limit (PEL) of 0.1 fibers per cubic centimeter (f/cc) of air as an 8-hour time-weighted average (TWA), and the Excursion Limit of 1.0 f/cc over a 30-minute sampling period.
- Employees must implement stringent dust control procedures to prevent asbestos in any airborne or settled dust.
- Waste and dust containing asbestos must be collected separately from other construction debris. Workers must conduct prompt and controlled clean up and disposal of asbestos wastes and debris in leak-tight containers.
- Asbestos-containing waste must be wet, packaged, labeled, stored, and disposed of in accordance with applicable regulations.
- Conduct clearance in accordance with contract specifications.

***Lead-Containing Paints and Materials*:**

- Employees must utilize respiratory protection until the initial air monitoring assessment documents safe working levels of airborne lead.
- An exposure assessment should be carried out when employees are disturbing LCP, LBP, or lead-containing materials to ensure that they are not exposed to airborne lead

concentrations greater than the PEL of 50 micrograms per cubic meter ($\mu g/m^3$) averaged over an 8-hour period. Additional periodic exposure monitoring may be required if the Action Level, 30 $\mu g/m^3$, averaged over an 8-hour period is exceeded.

- Employees must implement stringent dust control procedures to prevent airborne lead dust.
- Lead-containing debris must be segregated from other wastes, collected, and containerized. Wastes must be characterized per State of Hawaii requirements, including a determination of the waste as hazardous or non-hazardous. Lead-containing waste must be handled and disposed of in accordance with applicable requirements.
- Conduct clearance in accordance with contract specifications.

***Arsenic-Containing Materials*:**

- An exposure assessment should be carried out when employees are disturbing arsenic-containing materials to ensure that workers are not exposed to airborne arsenic concentrations greater than the PEL of 10 $\mu g/m^3$ averaged over an 8-hour period. Additional periodic exposure monitoring may be required if the Action Level averaged over an 8-hour period is exceeded.
- Employees must implement stringent dust control and engineering controls to minimize arsenic concentrations in any airborne dust.
- Arsenic-containing debris must be segregated from other wastes, collected, and containerized. Arsenic-containing wastes must be disposed of in accordance with applicable requirements. Wastes should be fully characterized, including a determination of the waste as hazardous or non-hazardous. A hazardous waste exclusion for wood products may be considered, applicable to certain arsenic-contain building materials. Landfill acceptance criteria should be evaluated prior to transportation for disposal.
- Conduct clearance in accordance with contract specifications.

***PCB-Containing Ballasts*:**

- All work involving PCB should be performed by properly trained and equipped personnel.
- A written spill plan may aid in spill response.
- Maintain a PCB spill response kit on site.
- Clean up leaks and spills and handle disposal operations in compliance with regulatory requirements and project specifications.
- Trained employees should clean up PCB spill response kit and appropriate equipment.
- Establish PCB controlled areas for removal or spill cleanup to prevent unauthorized entry of personnel. Maintain an access log of employees working in PCB controlled areas.
- All PCB waste must be stored and disposed of in compliance with TSCA regulations, and all records involving PCB must be properly maintained.
- Inspect PCB waste containers for seal tightness in a timely manner.

***Mercury-Containing Light Tubes and Switches*:**

- In an event light tubs are broken, ventilate the affected area immediately and continuously.

- All work involving mercury-containing items must be performed by properly trained and equipped personnel.
- A written mercury spill response plan may aid in spill response should a mercury release occur at the building.
- Clean up leaks and spills and handle disposal operations in compliance with regulatory requirements and spill kit Safety Data Sheet (SDS).
- Trained employees must ventilate the area and clean up mercury spills using the response kit and appropriate equipment and PPE.
- Establish mercury-controlled areas for removal or spill cleanup to prevent unauthorized entry of personnel. Maintain a log of employees working in mercury-controlled areas.
- All mercury waste must be stored and disposed of in compliance with EPA regulations, and all records involving mercury must be properly maintained.
- Inspect mercury waste containers for leaks in a timely manner.

Social: No minimization or mitigation measures are proposed or expected to be required of the Proposed Action as it will improve the health and safety conditions of the surrounding community.

Economic: No minimization or mitigation measures are proposed or expected to be required of the Proposed Action as it would result in a short-term positive economic impact due to demolition-related spending, employment, and the stimulation of indirect and induced employment within other local industries.

Health and Safety: The Proposed Action would improve the health and safety of the surrounding community due to the hazardous conditions that the infirmary building currently poses. The contractor would ensure that proper safety measures would be implemented for all workers at the project site during and after demolition. Additionally, BMPs for the transportation of large construction equipment and debris, noise emissions, air quality pollutants, stormwater runoff, and the proper disposal of hazardous waste would be utilized during the Proposed Action to prevent adverse health and safety impacts to the surrounding community.

Recreation: All demolition-related activities including the staging of demolition material and debris would all take place on the project site. BMPs would be used at the project site to minimize stormwater, fugitive dust pollution, and accessibility impacts to Honoka'a Park users. These BMPs include some or more of the following measures: watering or applying dust suppressants at active work areas, installing dust screens or wind barriers around the project site, installation of Filter Sock Perimeter Controls adjacent and down slope from disturbed areas, cleaning nearby pavements and paved roads affected by construction, and ensuring the transportation of demolition equipment and debris would take place during acceptable traffic periods to minimize potential disruption to Honoka'a park users.

Public Beach Access: No minimization or mitigation measures are proposed to be required of the Proposed Action as the project site is not located near the shoreline or any public beach access.

Cultural Resources and Practices: In the event that archaeological or cultural sites are discovered at the project site, all demolition activities would immediately cease, and proper protocols would be conducted to leave the remains undisturbed and in place. The State DLNR Historic Preservation Division and the County Police Department would be contacted and reported as required by law under HRS, Chapter 6E.

Visual/Aesthetic: No minimization or mitigation measures are proposed or warranted during the Proposed Action. During demolition, the staging of temporary demolition equipment and BMPs used at the project site would be placed in locations as to not significantly impact visual resources.

Environmental Justice: BMPs would be utilized at the project site to minimize noise, stormwater, and air quality pollutants from impacting the surrounding environment and the community. These BMPs include some or more of the following measures: watering or applying dust suppressants at active work areas and project access roads, installing dust screens or wind barriers around the project site, installing of Filter Sock Perimeter Controls adjacent and down slope from disturbed areas, cleaning nearby pavements and roads affected by demolition, covering open trucks carrying demolition material and debris, disposing of runoff on-site and not directing it to adjacent properties, proper disposal of hazardous waste, ensuring demolition activities would be conducted during appropriate times and days, and requiring demolition equipment to have emission control measures.

Rare, Threatened, and/or Endangered Species: All demolition activities would be short-term and temporary and would be conducted during daytime hours as not to disrupt rare, threatened, or endangered birds or bats passing through the area at night. If work occurs after normal working hours (i.e., at night) that would require artificial illumination for the project, such work would be avoided during the seabird fledging seasons (approximately September through December). Outdoor lights would be shielded and directed downwards to avoid directed lighting to minimize impacts to seabirds, migratory birds, or bats. In the event that threatened or endangered fauna were to pass through the immediate project site during demolition, all work would immediately be paused, and proper protocols would be taken to leave the species undisturbed until the species are away from the project site.

Surface and Ground Water Resources: Demolition plans would include BMPs to minimize erosion and sediment loading at the project site during and after demolition, as well as measures to contain runoff and fugitive dust on-site to prevent any from being directed to surface or ground water resources. These BMPs include installing dust screens or wind barriers around the project site, installing Filter Sock Perimeter Controls adjacent and down slope from disturbed areas, cleaning nearby pavements and paved roads affected by demolition, properly disposing of all hazardous waste, requiring that all development-generated runoff shall be disposed of on-site and not directed toward any adjacent properties, that a drainage plan may be required by the Plan Approval process in accordance with Section 25-2-72(3) of the Hawai'i County Code, and ensuring that all earthwork activities including grading, grubbing, and stockpiling shall conform to Chapter 10, Erosion and Sedimentary Control, of the Hawai'i County Code.

Wetlands: No minimization or mitigation measures are proposed or warranted as the project site is not located near or adjacent to any wetlands.

Floodplains: A Special Flood Hazard Development Permit would not be required as the project site is not located within a Special Flood Hazard Area. Demolition personnel would respond to any County of Hawai'i emergency flood alerts, as appropriate, to ensure safety during the short-term demolition period.

Riparian/Coastal Resources: No minimization or mitigation measures are proposed or warranted as the project site is not located near or adjacent to the coast or any riparian streams or rivers.

CONSULTATION

The following parties have been consulted about this declaration exemption (Name, affiliation, consultation date):

1.) Mr. Leslie Segundo, Environmental Health Specialist, State of Hawai'i Department of Health – Office of Environmental Quality Control; Consulted on July 14, 2020.
2.) Mr. Russell Tsuji, Administrator, State of Hawai'i Department of Land and Natural Resources – Land Division; Consulted on July 14, 2020.
3.) Mr. Alan Downer, Administrator, State of Hawai'i Department of Land and Natural Resources – State Historic Preservation Division; Consulted on July 14, 2020.
4.) Senator Lorraine R. Inouye, Hawai'i State Senate District 4; Consulted on July 14, 2020.
5.) Representative Mark M. Nakashima, Hawai'i House District 1; Consulted on July 14, 2020.
6.) Councilmember Valerie T. Poindexter, Hawai'i County Council District 1; Consulted July 14, 2020.
7.) Mr. William A. Kucharski, Director, County of Hawai'i Department of Environmental Management; Consulted on July 14, 2020; Response received on August 6, 2020.
8.) Ms. Roxcie L. Waltjen, Director, County of Hawai'i Department of Parks and Recreation; Consulted on July 14, 2020.
9.) Mr. Michael Yee, Director, County of Hawai'i Department of Planning; Consulted on July 14, 2020.
10.) Mr. David Yamamoto, P.E., Director, County of Hawai'i Department of Public Works; Consulted on July 14, 2020; Response received on August 7, 2020
11.) Mr. Keith Okamoto, Manager-Chief Engineer, County of Hawai'i Department of Water Supply; Consulted on July 14, 2020; Response received on August 6, 2020.

EXEMPT DECLARATION

The direct, cumulative, and potential impacts of the action described above have been considered pursuant to Chapter 343, Hawai'i Revised Statutes and Chapter 11-200.1, Hawai'i Administrative Rules. I declare that the action described above will have minimal or no significant impact on the environment and is therefore exempt from the requirement to prepare an environmental assessment.

Irene J Carpenter
Signature of Director or Delegate

Jan 6, 2021
Date

☒ This document is on file in our office and is available for public review.

☒ This document has been submitted to the Office of Environmental Quality Control for publication in *The Environmental Notice.*